



Columbia Country Club
Est. 1921

July 7, 2016

Planning and Zoning Commission
City of Columbia
701 East Broadway
Columbia, MO 65205

RE: Case #16142
Landmark Hospital OP
Rezoning & Development Plan Amendment

Dear Commissioners:

With the assistance of our engineering firm, Engineering Surveys and Services, Inc., we have prepared this letter to address our concerns with the proposed addition to Landmark Hospital. We became aware of the proposal last week by the posted notification on site. The following provides a brief history, a summary of our concerns, our interpretation of the stormwater ordinance, and recommended amendments to the OP plan approval.

The Columbia Country Club is located downstream of Landmark Hospital. All runoff from the facility is conveyed to the Club via an unnamed tributary to Hinkson Creek located on the south side of the Club's property, south of the Club's irrigation pond. This stream and pond have been in this location for more than 50 years. A few years following the construction of Landmark Hospital, the stream became unstable, causing bank erosion and incising of the stream bed, which has led to the loss of numerous trees, exposure of irrigation lines, and clogging of cart path crossing culverts and bridges, and downstream storm sewer. Of the greatest concern, is the loss of several feet of the irrigation pond dam. The stream's watershed has remained relatively unchanged for the last 20 years, with the exception of Landmark Hospital.

We believe the increase in runoff from Landmark Hospital has caused increased stream erosion due to lack of maintenance and upkeep of their stormwater management facilities. The pervious pavement is deteriorated and the basin appears to be full of sediment. The proposed addition will only further exacerbate the stream and pond dam erosion problems if no additional measures are taken to address stormwater management. We have reviewed the OP Development Plan and found that no additional stormwater management features or improvements to the existing features are proposed.

Landmark Hospital's engineer claims that the project is exempt from the Stormwater Ordinance based on 12A-87(c)(2) of the City Ordinances, which states:

Land disturbances of less than ten thousand (10,000) square feet that do not create more than five hundred (500) square feet of additional impervious surface

However, we believe this is contrary to 12A-87(e) which states:

Stormwater management shall be provided in accordance with the conceptual stormwater management plan in zoning districts PUD, O-P, C-P, M-R and M-P for which a conceptual stormwater management plan was approved before September 4, 2007, or land in any other zoning district for which a site plan was approved before September 4, 2007, unless a revision to the plan for the site is requested which adversely impacts the stormwater discharge from the site. An "adverse impact" is one that significantly increases the volume of stormwater discharge from the site, decreases the water quality of the stormwater discharge, or redirects the stormwater discharge in a manner that results in downstream stormwater drainage impacts that would not have occurred with the original plan. **Approvals for stormwater plans approved before September 4, 2012 shall expire on January 1, 2016 for sites on which the planned work has not commenced.** Approval of all stormwater plans approved on or after September 4, 2012 shall expire seven (7) years after the date of approval if the planned work has not commenced.

The project has an approved stormwater management plan that was approved in 2008 for which work has commenced. Therefore, the stormwater management plan proposed in 2008 is in force for perpetuity and should be enforced with this plan revision.

Based on the history, the known downstream erosion and imminent pond dam failure, and the misinterpretation of the stormwater ordinance, we urge the commissioners to NOT recommend approval of this project as it has been submitted. We recommend approval be conditioned on the following:

1. Existing stormwater management facilities be repaired and maintained as required by the Stormwater Management/BMP Facilities Covenant prior to the issuance of a Certificate of Occupancy for the building addition or within 1 year, whichever comes first.
2. All new impervious surface be treated to a level of service of at least 8 per the Stormwater Management and Water Quality Manual, exclusive of removed and replaced impervious surface.
3. All new impervious surfaces be detained to predeveloped discharge rates per the Stormwater Management and Water Quality Manual, exclusive of removed and replaced impervious surface.
4. Channel protection detention be provided for the entire facility per the Stormwater Management and Water Quality Manual.

Thank you for your attention to our concerns.

Sincerely,


Jean Leonatti
President, Board of Directors