



Corporate Headquarters

September 4, 2012

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David Henry
United States Fish and Wildlife Service
Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230

RE: *Section 7 Endangered Species Act Consultation*—Union Square Investments, Ltd.
/ Diebold, Incorporated, Green, Summit County, Ohio

Dear Mr. Henry:

Please review the following information regarding the 148.6-acre Union Square Development Site. To assist with your review of the project, site maps and photographs are enclosed.

PROJECT PURPOSE AND LOCATION

Union Square Investments, Ltd. / Diebold are proposing to develop 148.6 acres to construct the new Diebold world headquarters and mixed use corporate campus. The project area is located in the city of Green, Summit County, Ohio. The restoration project is bounded by Interstate 77 on the east, State Route 241 (Massillon Road) to the west, and is north of Wise Road. The latitude and longitude coordinates for the project center point are 40.94970, -81.45640. The project area is indicated on the USGS 7.5-minute map, an excerpt from the North Canton quadrangle, located in Attachment A. The Water Resource Delineation Map of the project area is included in Attachment B. The Site Plan is included in Attachment C. Photographs of the site are included in Attachment D.

PROJECT AREA DESCRIPTION

The project area was surveyed to collect information on potential wetlands, streams, and protected species habitat. The project area includes a total of 15.954 acres of wetlands and 6,993 linear feet of streams. The locations of these water resources are marked on the map included in Attachment B. Photographs of selected water resources are included in Attachment D.

The project plan is included in Attachment C and shows the proposed impacts of water resources.

FEDERALLY LISTED SPECIES

Federally listed species within Summit County are discussed below:

- ✿ Summer roosting habitat for the federally endangered Indiana bat (*Myotis sodalis*) includes large trees that contain characteristics such as exfoliating bark, dead wood, crevices, and cavities. To support a maternity colony, trees with these habitat features need to have good solar exposure. Indiana bats tend to inhabit trees at the edges of woodlots and along watercourses where they can travel and forage. To evaluate the project site for the potential presence of the Indiana bat, mist net surveys were conducted on August 3, 4, 8, and 9 of 2011. No Indiana bats were captured. Coordination with Angela Boyer of the USFWS was implemented for this survey.
- ✿ The federally threatened Northern monkshood (*Aconitum noveboracense*) is a flowering plant typically found on cool, moist, shaded cliff faces or talus slopes in wooded ravines, near water seeps. No cliffs, ravines, talus slopes or water seeps occur within the project area.
- ✿ The bald eagle (*Haliaeetus leucocephalus*), a species of concern, is protected under the Bald and Golden Eagle Protection Act. Bald eagle habitat includes areas adjacent to water bodies that provide suitable feeding (lakes, rivers, oceans) and must include large trees appropriate for roosting and nesting. Several nearby offsite ponds could provide suitable feeding habitat for the bald eagle. No bald eagles or nest sites were observed during fieldwork.

REQUEST FOR FINDING

Considering the information above, we are requesting a finding from the United States Fish and Wildlife Service regarding any adverse effect to any federally listed, threatened or endangered species in the project area. A response is requested to ensure compliance with the Endangered Species Act prior to initiating activities.

Please forward your response at the earliest possible convenience to the attention of:

Judith Mitchell, Project Manager
Davey Resource Group
259 S. Water Street, Suite 300
Kent, Ohio 44240

In the event you have any questions or need further information, please do not hesitate to contact me at 330-673-5685, ext. 8067 or via e-mail at Judith.mitchell@davey.com. Thank you for your prompt attention.

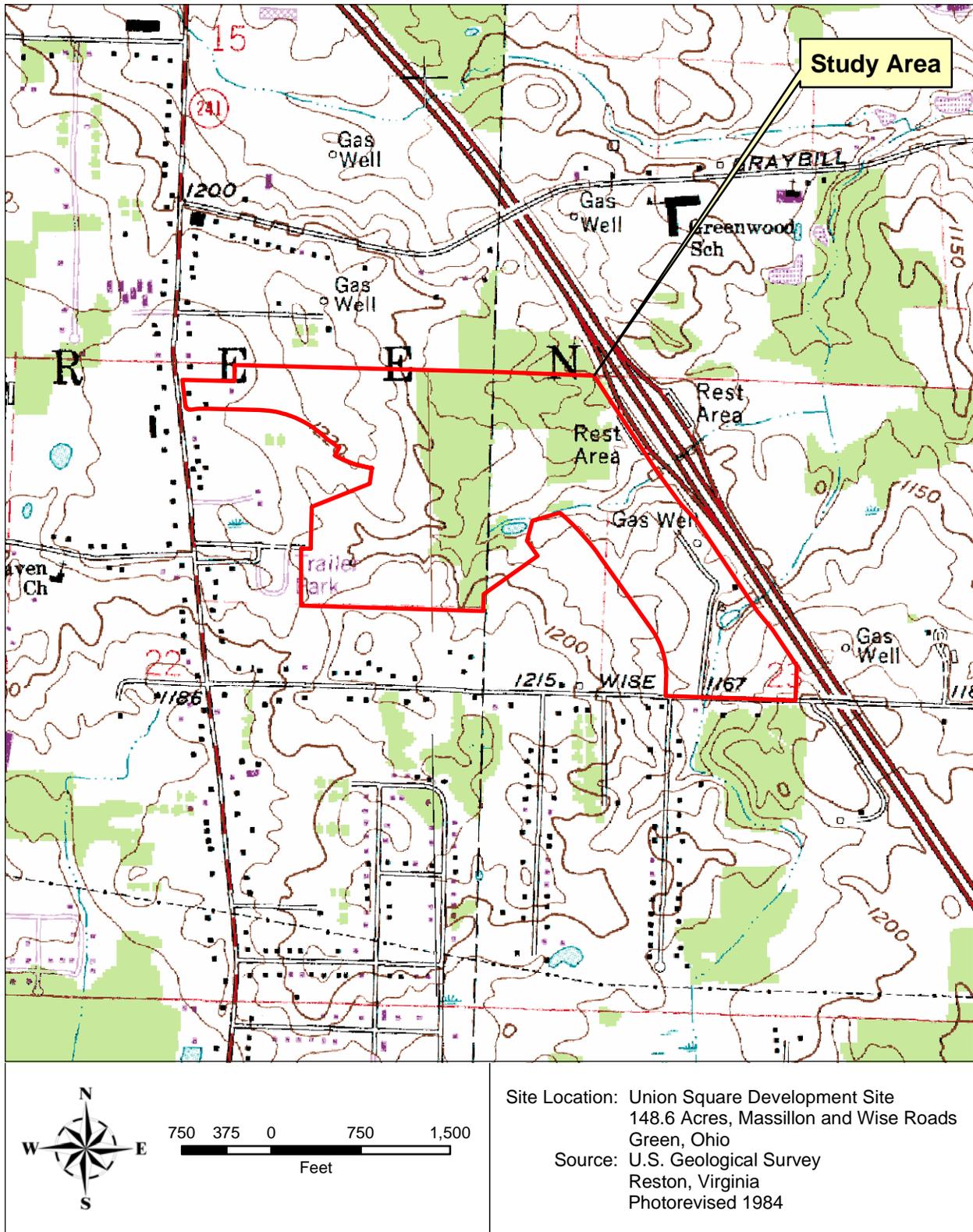
Sincerely,



Judith Mitchell, Project Manager
Natural Resource Consulting

Attachment A
USGS Map

Location of Study Area on USGS 7.5-Minute Topographic Map (North Canton Quadrangle)



Attachment B
Water Resource Delineation Map

Project Area Map

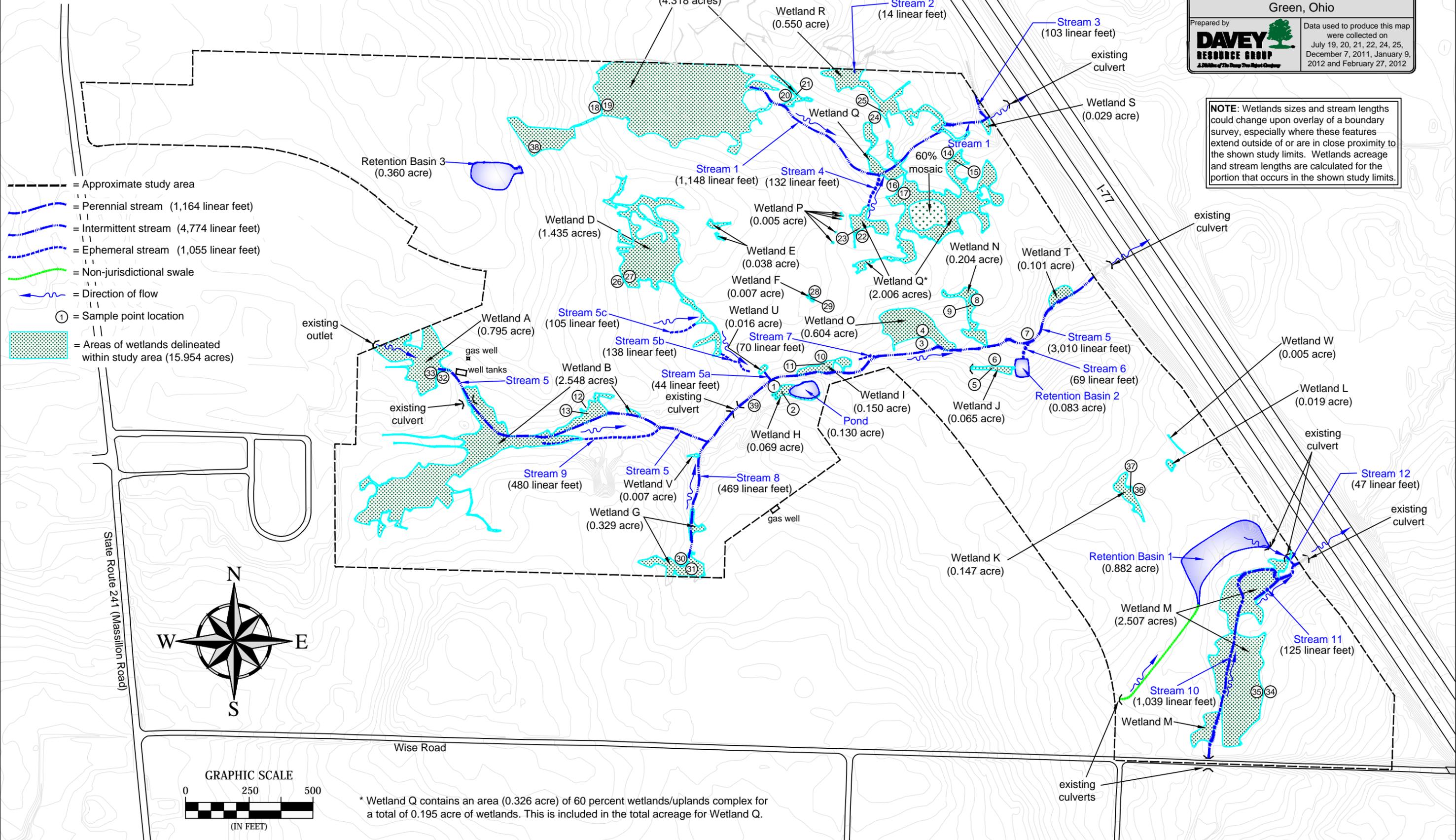
Prepared for
Benesch Friedlander Coplan & Aronoff

Union Square Development Site
 148.6 Acres, Massillon and Wise Roads
 Green, Ohio

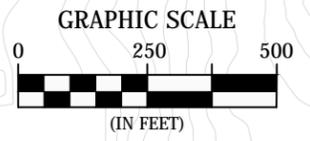
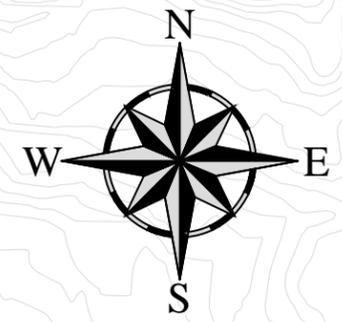
Prepared by
DAVEY RESOURCE GROUP
A Division of The Trapp Free Report Company

Data used to produce this map were collected on
 July 19, 20, 21, 22, 24, 25,
 December 7, 2011, January 9,
 2012 and February 27, 2012

NOTE: Wetlands sizes and stream lengths could change upon overlay of a boundary survey, especially where these features extend outside of or are in close proximity to the shown study limits. Wetlands acreage and stream lengths are calculated for the portion that occurs in the shown study limits.



- - - - - = Approximate study area
- (solid blue) = Perennial stream (1,164 linear feet)
- (dashed blue) = Intermittent stream (4,774 linear feet)
- (dotted blue) = Ephemeral stream (1,055 linear feet)
- (green) = Non-jurisdictional swale
- (blue arrow) = Direction of flow
- ① = Sample point location
- ▨ (stippled) = Areas of wetlands delineated within study area (15.954 acres)



* Wetland Q contains an area (0.326 acre) of 60 percent wetlands/uplands complex for a total of 0.195 acre of wetlands. This is included in the total acreage for Wetland Q.

Attachment C

Site Plan

LEGEND

- - - - - = Approximate study area
- SWMB = Storm Water Management Basin



0 200' 400' 800'

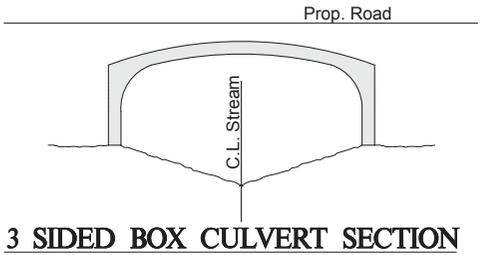
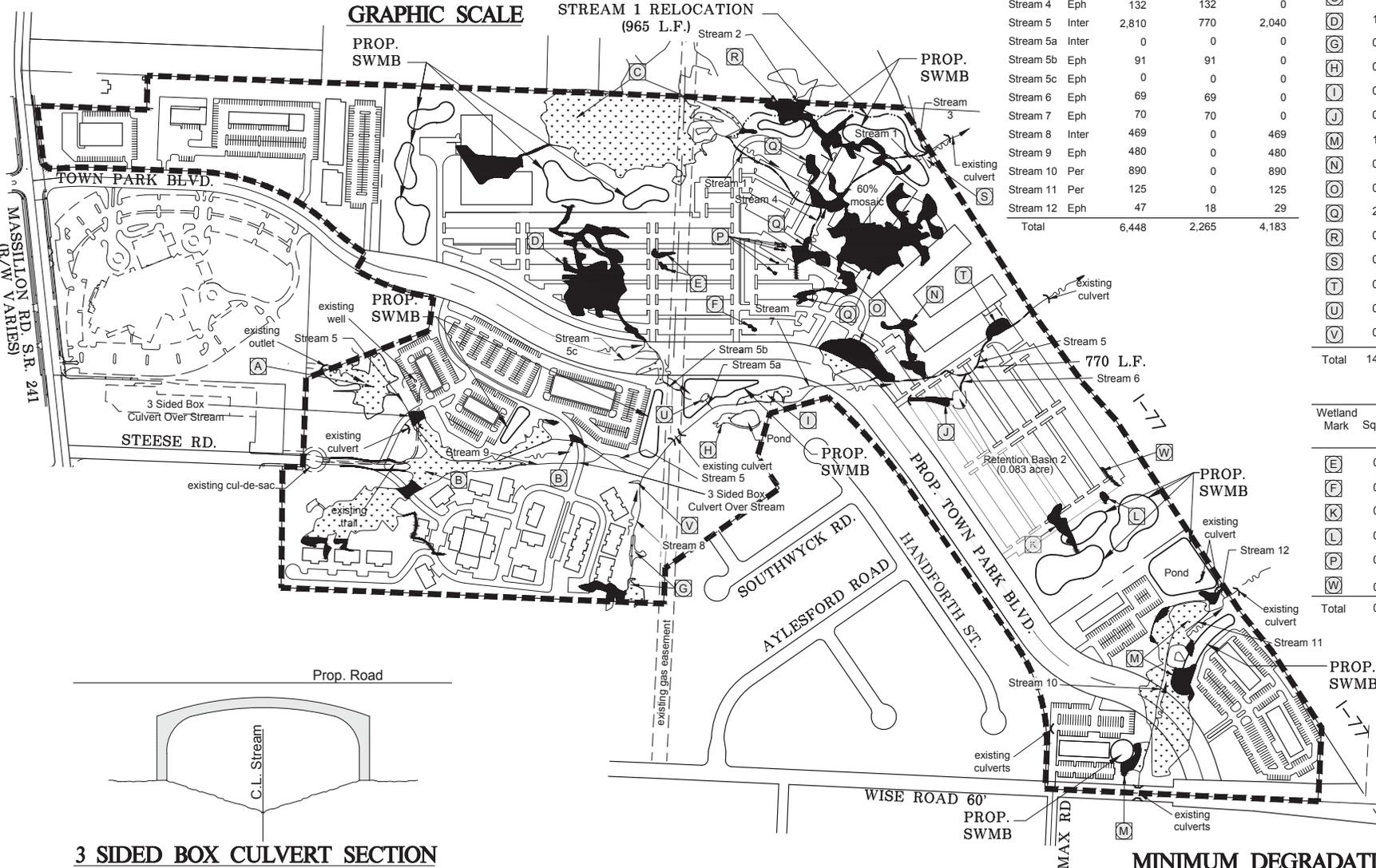
GRAPHIC SCALE

NOTE:
IMPACTED WETLAND AREAS SHOWN WITH
SOLID SHADING. STREAMS ARE SHOWN
WITH BOLD LINE & LENGTH IMPACTED.

Stream Mark		Stream Data		
		Union Sq./Diebold Stream (L.F.)	Union Sq./Diebold Impact (L.F.)	Preserved Stream (L.F.)
Stream 1	Inter	1,148	998	150
Stream 2	Eph	14	14	0
Stream 3	Inter	103	103	0
Stream 4	Eph	132	132	0
Stream 5	Inter	2,810	770	2,040
Stream 5a	Inter	0	0	0
Stream 5b	Eph	91	91	0
Stream 5c	Eph	0	0	0
Stream 6	Eph	69	69	0
Stream 7	Eph	70	70	0
Stream 8	Inter	469	0	469
Stream 9	Eph	480	0	480
Stream 10	Per	890	0	890
Stream 11	Per	125	0	125
Stream 12	Eph	47	18	29
Total		6,448	2,265	4,183

Wetland Mark	Wetland Data		
	Union Sq./Diebold Area	Union Sq./Diebold Impact	Preserved Wetland Area
A	0.784 ac.	0.000 ac.	0.784 ac.
B	2.548 ac.	0.328 ac.	2.220 ac.
C	4.318 ac.	0.480 ac.	3.838 ac.
D	1.338 ac.	1.321 ac.	0.017 ac.
E	0.329 ac.	0.149 ac.	0.180 ac.
F	0.069 ac.	0.069 ac.	0.000 ac.
G	0.150 ac.	0.150 ac.	0.000 ac.
H	0.065 ac.	0.065 ac.	0.000 ac.
I	1.747 ac.	0.444 ac.	1.303 ac.
J	0.204 ac.	0.204 ac.	0.000 ac.
K	0.442 ac.	0.442 ac.	0.000 ac.
L	2.006 ac.	2.006 ac.	0.000 ac.
M	0.550 ac.	0.550 ac.	0.000 ac.
N	0.029 ac.	0.000 ac.	0.029 ac.
O	0.101 ac.	0.101 ac.	0.000 ac.
P	0.000 ac.	0.000 ac.	0.000 ac.
Q	0.007 ac.	0.000 ac.	0.007 ac.
Total	14.687 ac.	6.309 ac.	8.378 ac.

Isolated Wetland Data			
Wetland Mark	Union Sq./Diebold Area	Union Sq./Diebold Impact	Preserved Wetland Area
E	0.038 ac.	0.038 ac.	0.000 ac.
F	0.007 ac.	0.007 ac.	0.000 ac.
K	0.147 ac.	0.147 ac.	0.000 ac.
L	0.019 ac.	0.019 ac.	0.000 ac.
P	0.005 ac.	0.005 ac.	0.000 ac.
W	0.005 ac.	0.005 ac.	0.000 ac.
Total	0.221 ac.	0.221 ac.	0.000 ac.



MINIMUM DEGRADATION ALTERNATIVE SITE PLAN

LEGEND

- - - - - = Approximate study area
- SWMB = Storm Water Management Basin



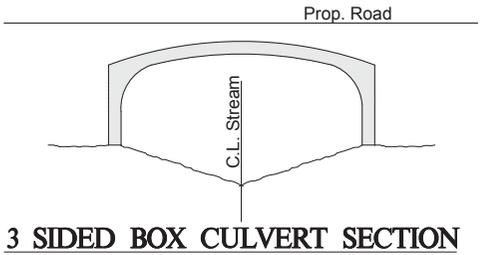
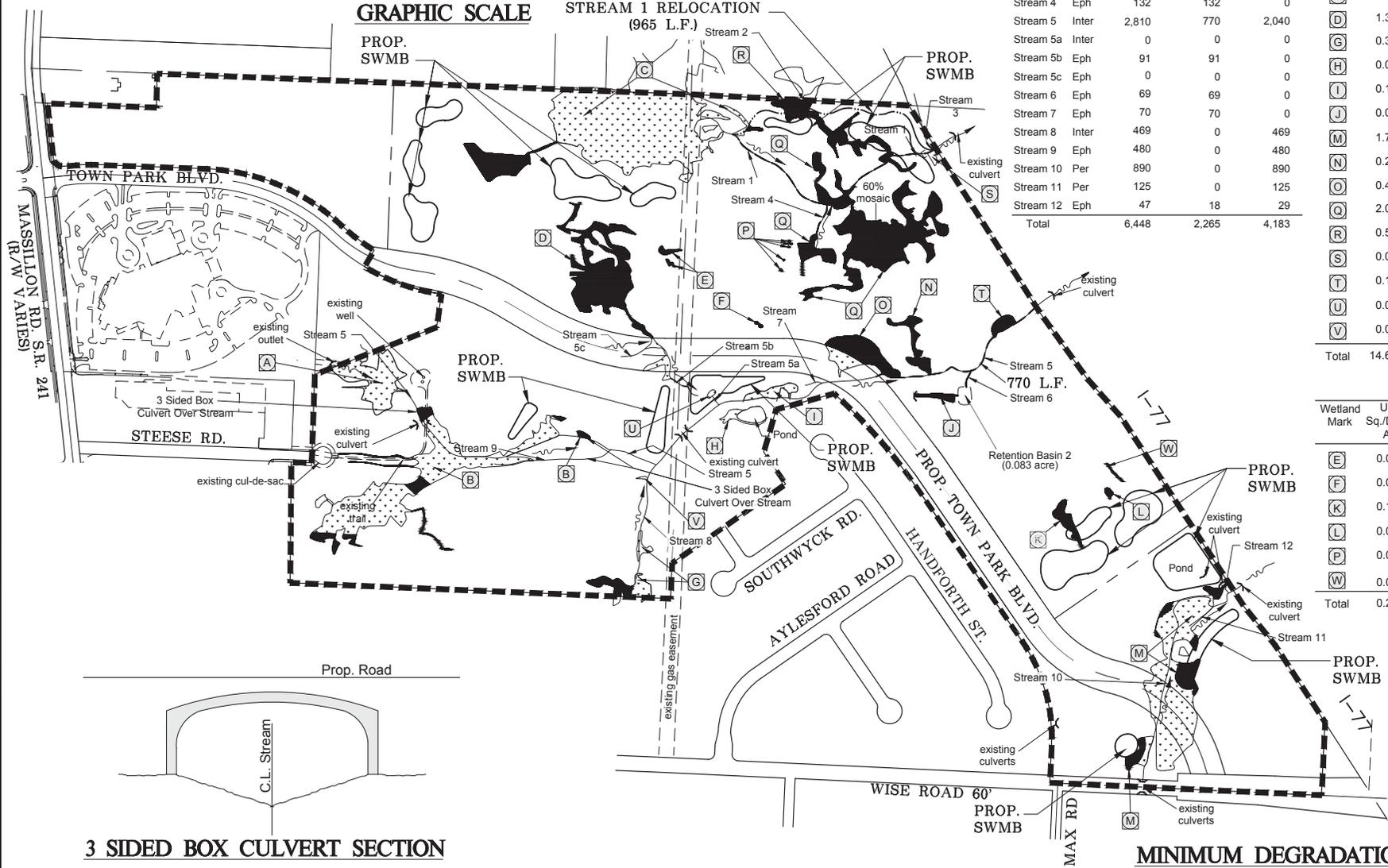
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S	0.029 ac.	0.000 ac.	0.029 ac.
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U	0.000 ac.	0.000 ac.	0.000 ac.
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L	0.019 ac.	0.019 ac.	0.000 ac.
P	0.005 ac.	0.005 ac.	0.000 ac.
W	0.005 ac.	0.005 ac.	0.000 ac.
Total	0.221 ac.	0.221 ac.	0.000 ac.



3 SIDED BOX CULVERT SECTION

**MINIMUM DEGRADATION ALTERNATIVE
IMPACT FOOTPRINT**

Attachment D

Photographs of Site



Photograph Location 1 (7-22-11) A portion of Wetland B is dominated by heavy scrub/shrub vegetation.



Photograph Location 2 (7-22-11) Wetland B is covered with lowland woods.



Photograph Location 3 (7-22-11) Much of Wetland C has been logged and is now dominated by emergent vegetation.



Photograph Location 4 (7-22-11) This portion of Wetland D is dominated by lowland woods.



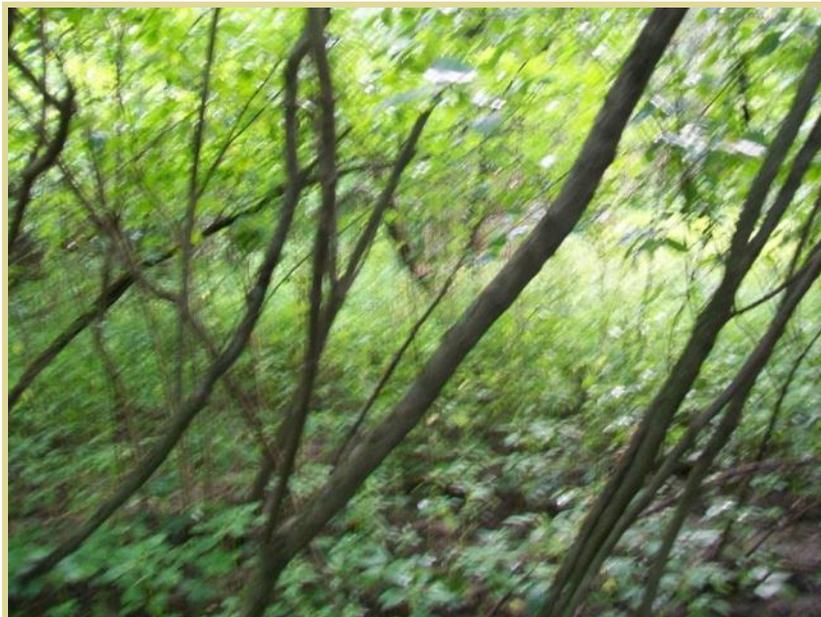
Photograph Location 5 (7-22-11) This portion of Wetland D has been logged.



Photograph Location 6 (7-22-11) Wetland E is covered with dense shrubs.



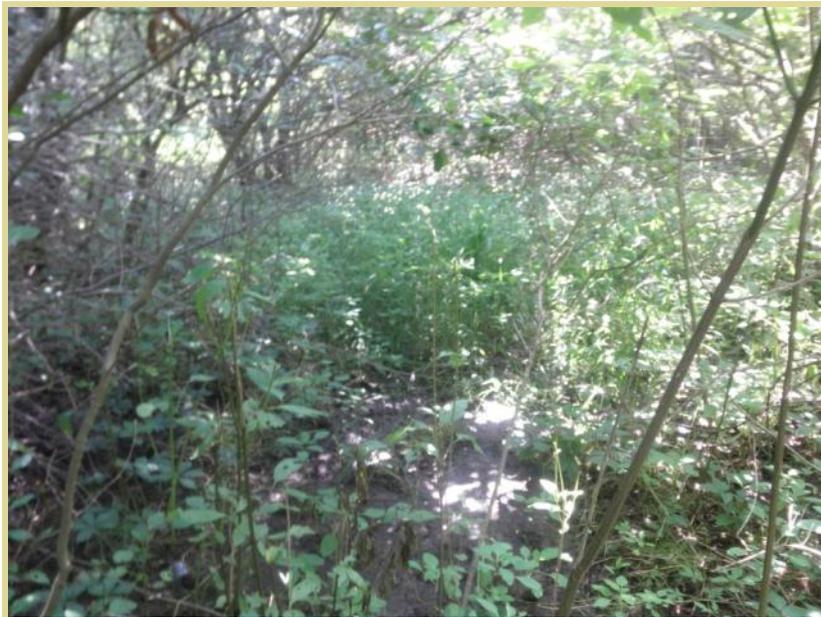
Photograph Location 7 (7-22-11) Wetland F is an emergent wetland that is regularly mowed.



Photograph Location 8 (7-22-11) Wetland G is dominated by immature woods with areas of shrubs.



Photograph Location 9 (7-22-11) Wetland H is located in association with a small pond.



Photograph Location 10 (7-22-11) Wetland I is covered with dense scrub/shrub vegetation.



Photograph Location 11 (7-22-11) Wetland J is dominated by emergent vegetation.



Photograph Location 12 (7-22-11) Wetland J forms at this stormwater outlet.



Photograph Location 13 (7-22-11) Wetland K is dominated by invasive species including *Phalaris arundinacea* (reed canary grass, FACW) and *Typha angustifolia* (narrow-leaved cattails, OBL).



Photograph Location 14 (7-22-11) Wetland L is a small, isolated pocket of wetland dominated by emergent vegetation.



Photograph Location 15 (7-22-11) A small area of Wetland M is irregularly mowed.



Photograph Location 16 (7-22-11) The majority of Wetland M is dominated by heavy shrub vegetation.



Photograph Location 17 (7-22-11) This portion of Wetland N is occasionally mowed and is dominated by emergent vegetation.



Photograph Location 18 (7-22-11) This area of Wetland O is dominated by young lowland woods.



Photograph Location 19 (7-22-11) Small pockets of wetland are located in a mowed field. These areas, collectively called Wetland P, are dominated by cattails (*Typha* sp.).



Photograph Location 20 (7-22-11) The majority of Wetland Q has been logged. A mix of shrubs and emergent vegetation is growing in the logged portion of this wetland.



Photograph Location 21 (7-22-11) Because of the woody debris, access through Wetland Q can be difficult.



Photograph Location 22 (7-22-11) Within a portion of Wetland Q is an upland/wetland mosaic. American beech (*Fagus grandifolia*) trees are growing on upland mounds surrounded by areas of saturated soils.



Photograph Location 23 (7-22-11) Wetland Q has areas of lowland woods remaining with mixed shrubs.



Photograph Location 24 (7-22-11) Wetland R has a mix of emergent and scrub/shrub vegetation.



Photograph Location 25 (7-22-11) Wetland R has been logged and is now dominated by a mix of emergent vegetation and small shrubs.



Photograph Location 26 (7-22-11) Because of the woody debris, access through Wetland R can be difficult.



Photograph Location 27 (7-22-11) Wetland T is a mix of emergent and scrub/shrub vegetation.



Photograph Location 28 (7-22-11) The upper reach of Stream 1 is very small.



Photograph Location 29 (7-22-11) With the increase in hydrology to Stream 1, the quality of the habitat characteristics increase downstream.



Photograph Location 30 (7-22-11) The substrate of Stream 1 is dominated by sand and gravel.



Photograph Location 31 (7-22-11) Stream 2 is a small drainageway that drains north off site.



Photograph Location 32 (7-22-11) Stream 3 flows south, parallel to Route 77, and drains from off site into Stream 1.



Photograph Location 33 (7-22-11) Stream 4 is a small, ephemeral drainageway.



Photograph Location 34 (7-22-11) Stream 5 is an intermittent drainageway that drains west across the property, draining off site through a culvert under I-77.



Photograph Location 35 (7-22-11) The substrate of Stream 5 is dominated by gravel.



Photograph Location 36 (7-22-11) Stream 6 is a small, ephemeral stream that forms at the outlet of Retention Basin 2.



Photograph Location 37 (7-22-11) Stream 7 is a small, ephemeral drainageway.



Photograph Location 37 (7-22-11) Stream 12 is a small, intermittent drainageway that forms at the outlet of Retention Basin 1.