



January 2, 2014

Mr. Teagen Loew
Isolated Wetlands Permitting
Ohio Environmental Protection Agency
Division of Surface Water
50 West Town Street, Suite 700
Columbus, OH 43215

Dear Teagen:

Subject: Response: Incomplete Level Two Individual Isolated Wetland Application
Shelly Materials' Reno Sand and Gravel Site
Newport Township, Washington County, Ohio
CEC Project 132-406
OEPA # 134274

Civil & Environmental Consultants, Inc. (CEC) presents to you the following response to the Ohio Environment Protection Agency's (OEPA) Incomplete Level Two Individual Isolated Wetland Permit Application dated November 22, 2013 for the above referenced Site.

The OEPA has requested that further information regarding the analysis of practicable on-site alternatives to the proposed filling be submitted. Specifically, descriptions, schematics, and appropriate economic information regarding the preferred alternative, minimum alternative, and the non-degradation alternative for the design and operation of the project.

It should be noted that one, 1.44 acre jurisdictional wetland is present in the southern portion of the Site; however, mining is not projected to occur in this area in the immediate future. Prior to this occurring, Shelly Materials will apply for request for Clean Water Act Section 401/404 Authorization.

The following sections present an analysis of the viability of each alternative and figures that illustrate each alternative.

Preferred Alternative

The Preferred Alternative was designed to the meet aggregate mining needs, economic constraints, and regulatory requirements, while optimizing land use within the site boundaries. The mining operation has proposed to advance allowing approximately 9.9 million tons of

aggregate reserves to be mined. This will generate an estimated payroll of \$418,000 per year with an estimated \$29,000 in payroll taxes. Due to the fact that this is an aggregate expansion, no new jobs will be generated. However, an estimated \$3.1 million total in revenue and \$28,000 in state and local taxes per year will be generated under this alternative.

As stated in the Level Two Individual Isolated Wetland Permit Application, the entire area of Wetland B, approximately 1.02 acre, is proposed to be impacted. Figure 1 depicts the area of mining and proposed impacts to Wetland B under the Preferred Alternative. To mitigate for proposed wetland impacts, 2.0 acres of wetland mitigation credit will be purchased from the Big Darby Hellbranch Wetland Mitigation Bank from The Ohio Wetlands Foundation.

Minimal Degradation Alternative

The Minimum Degradation Alternative is a modification of the preferred alternative that avoids more impacts to Wetland B and provides an ecologically beneficial mitigation opportunity. Under this alternative the mining operation would result in approximately 9.12 million tons of aggregate reserves to be mined. This will generate an estimated payroll of \$385,000 per year with an estimated \$26,500 of payroll taxes. Due to the fact that this is an aggregate expansion, no new jobs will be generated. However, an estimated \$2.85 million total in revenue and \$26,000 in state and local taxes per year will be generated.

Approximately 0.09 acre of isolated Wetland B will be impacted. However, it should be noted that secondary impacts are anticipated. As with most sand and gravel operations, the mining activity will result in the creation of a large open water area. By mining only a portion of Wetland B, it is suspected that the remaining portion of the wetland will slough off into the open water. Resulting in a possible total loss of the wetland with none of the available reserves mined.

Figure 2 depicts the area of mining and proposed direct impacts to Wetland B under the Minimal Degradation Alternative.

Non-Degradation Alternative

The Non-Degradation Alternative would reduce the acreage available to mine by approximately 1.4 million tons of aggregate reserves. This reduction in available aggregate reserves would result in less environmental impacts however; it would reduce the amount of amount of state and local taxes generated. Under this alternative the mining operation would result in approximately

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8.5 million tons of aggregate reserves to be mined. This will generate an estimated payroll of \$359,000 per year with an estimated \$25,000 of payroll taxes. Due to the fact that this is an aggregate expansion, no new jobs will be generated. However, an estimated \$2.66 million total in revenue and \$24,000 in state and local taxes per year will be generated. Figure 3 depicts the area of mining for the Non-Degradation Alternative.

Though no direct impacts will occur under this alternative, secondary impacts are suspected to occur. Due to the approximate cut of the adjacent mining operation and the alluvial deposits present, it is possible that the creation of the open water area could have secondary impacts to the hydrology of the wetland, ultimately reducing the source of hydrology thus, impacting the wetland.

Conclusion

As requested in the Level Two Individual Isolated Wetland Permit Application and stated above, we request authorization under the Preferred Alternative to impact approximately 1.02 acre of isolated wetland. We appreciate your review of the provided information. If you have any questions or need additional information please call me at 614-310-0175, or email me at jvandusen@cecinc.com.

Respectfully submitted,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Jamie VanDusen
Project Manager



Bill Acton
Principal

cc: Mr. Kevin Cooperrider, Shelly Materials

FIGURES

Figure 1 Preferred Design
Figure 2 Minimal Degradation Alternative
Figure 3 Non-Degradation Alternative



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LEGEND

- APPROXIMATE SITE BOUNDARY
- PROPOSED MINING ACTIVITY
- ISOLATED WETLAND
- JURISDICTIONAL WETLAND
- PERENNIAL STREAM
- EPHEMERAL STREAM
- NON-JURISDICTIONAL SWALE

REFERENCE:
GOOGLE EARTH PRO IMAGERY,
DATED: 6/3/2013; ACCESSED 9/16/2013.

MICROSOFT VIRTUAL EARTH / BING IMAGERY
PROVIDED BY ESRI, ACCESSED 1/2/2014.



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SHELLY MATERIALS
RENO SAND & GRAVEL SITE
NEWPORT TOWNSHIP
WASHINGTON COUNTY, OHIO

PREFERRED DESIGN

DRAWN BY:	ECV	CHECKED BY:	JMV	APPROVED BY:	WTA*	FIGURE:	1
DATE:	1/2/2014	MAP SCALE:	1" = 300'	PROJECT NO:	132-406.0001		

*HAND SIGNATURE ON FILE



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LEGEND

- APPROXIMATE SITE BOUNDARY
- PROPOSED MINING ACTIVITY
- ISOLATED WETLAND
- JURISDICTIONAL WETLAND
- PERENNIAL STREAM
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**SHELLY MATERIALS
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MINIMAL DEGRADATION ALTERNATIVE

DRAWN BY:	ECV	CHECKED BY:	JMV
DATE:	1/2/2014	MAP SCALE:	1" = 300'
APPROVED BY:	WTA*	PROJECT NO:	132-406.0001
FIGURE:	2		

*HAND SIGNATURE ON FILE



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LEGEND	
	APPROXIMATE SITE BOUNDARY
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	ISOLATED WETLAND
	JURISDICTIONAL WETLAND
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NON-DEGRADATION ALTERNATIVE

DRAWN BY:	ECV	CHECKED BY:	JMV	APPROVED BY:	WTA*	FIGURE:	3
DATE:	1/2/2014	MAP SCALE:	1" = 300'	PROJECT NO:	132-406.0001		

*HAND SIGNATURE ON FILE