



**APPLICATION FOR CLEAN WATER ACT
SECTION 401/404 AUTHORIZATION**

CORNERSTONE BUSINESS PARK

TWINSBURG, SUMMIT COUNTY, OHIO

Prepared For:

TWINSBURG INDUSTRIAL PROPERTIES, LLC

Mr. Kevin See

800 E. 96th Street, Suite 175

Indianapolis, IN 46240

Prepared By:

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

COLUMBUS, OHIO

CEC Project 110-816

April 2, 2013

Civil & Environmental Consultants, Inc.

| | | | | | | | |
|-----------------|---|-------------------|--------------|---------------------|--------------|-------------------------|--------------|
| Columbus | 8740 Orion Place Suite 100 Columbus, Ohio 43240 Ph: 614/540-6633 / Fx: 614/540-6638 Toll Free: 888/598-6808 columbus@cecinc.com www.cecinc.com | Austin | 855/365-2324 | Cleveland | 866/507-2324 | North Central PA | 877/321-2324 |
| | | Boston | 866/312-2024 | Detroit | 866/380-2324 | Phoenix | 877/231-2324 |
| | | Charlotte | 855/859-9932 | Export | 800/899-3610 | Pittsburgh | 800/365/2324 |
| | | Chicago | 877/963-6026 | Indianapolis | 877/746-0749 | St. Louis | 866/250-3679 |
| | | Cincinnati | 800/759-5614 | Nashville | 800/763-2326 | Toledo | 888/598-6808 |



TABLE OF CONTENTS

| | <u>Page</u> |
|--|-------------|
| 1.0 INTRODUCTION | 1 |
| 1.1 Site Location and Description | 1 |
| 1.2 Proposed Site Use and Site Selection Alternative Analysis..... | 1 |
| 2.0 REGULATORY DOCUMENTATION | 3 |
| 2.1 Jurisdictional Waters Determination | 3 |
| 2.2 Previous authorized Impacts | 4 |
| 2.3 Water Quality Assessment | 4 |
| 2.4 Threatened and Endangered Species | 5 |
| 2.5 Cultural Resources | 7 |
| 2.6 Application Forms..... | 7 |
| 3.0 ALTERNATIVES ANALYSIS..... | 8 |
| 3.1 Preferred Alternative | 8 |
| 3.2 Minimum Degradation Alternative | 15 |
| 3.3 Non-Degradation Alternative..... | 18 |
| 4.0 CONCLUSIONS..... | 20 |

FIGURES

Figure 1 – Site Location Map

Figure 2 – Existing Conditions Map

APPENDICES

- Appendix A – Application for Ohio EPA Section 401 Water Quality Certification
- Appendix B – Department of Army Permit Application
- Appendix C – Site Photographs and Photograph Location Map
- Appendix D – PJWD Report and Addendum Letter
- Appendix E – USACE Verification Letter
- Appendix F – USACE NWP 39 Authorization Letter
- Appendix G – Verification of Mitigation Funds
- Appendix H – ORAM Forms
- Appendix I – ODNR Correspondences
- Appendix J – USFWS Correspondences
- Appendix K – Cultural Resources Report
- Appendix L – Preferred Alternative Exhibit
- Appendix M – Minimal Degradation Alternative Exhibit
- Appendix N – Non-Degradation Alternative Exhibit
- Appendix O – Wetland Mitigation Purchase Agreements



1.0 INTRODUCTION

Civil & Environmental Consultants, Inc. (CEC) was retained by Twinsburg Industrial Properties, LLC to prepare this application package to request Clean Water Act Section 401/404 authorization to impact approximately 2.43 acres of jurisdictional wetlands for the proposed CornerStone Business Park, formally known as the former Chrysler Stamping Plant Site (USACE #2011-00912), located in Twinsburg, Ohio (hereinafter referred to as the “Site”). Application forms for the Ohio Environmental Protection Agency (OEPA) Section 401 Water Quality Certification and the Department of the Army Section 404 permit applications are attached as Appendix A and B, respectively. CEC has also recently submitted a General Isolated Wetland permit to the OEPA dated February 20, 2013.

1.1 SITE LOCATION AND DESCRIPTION

The approximately 167+/- acre Site is located at the intersection of East Aurora and Chamberlin Road in Twinsburg, Ohio (Figure 1) and consists of a former industrial facility, open fields, upland forests, forested wetlands, and emergent wetland communities. Representative photographs of the Site are included as Appendix C.

Hydrologic features on the Site consist of five forested wetlands, one scrub/shrub wetland, thirteen emergent wetlands, and three non-jurisdictional swales.

1.2 PROPOSED SITE USE AND SITE SELECTION ALTERNATIVE ANALYSIS

Twinsburg Industrial Properties proposes to construct an industrial business park within the vicinity of Twinsburg, Ohio. The Site was selected for the following reasons:

- 1) proximity to Interstate 271 and Interstate 480
- 2) availability of municipal utilities
- 3) availability of existing railroad system
- 4) lack of available land in the city of Twinsburg

Sites with equivalent access, acreage, and less environmentally damaging impacts to waters of the U.S. could not be identified.

The former Chrysler Stamping Plant Site within the city of Twinsburg is an ideal location for a new business park due to its proximity to highways, existing railroad system, and the need for economic recovery for the city. Over the last few years the city has experienced economic downfall resulting in the Chrysler Bankruptcy which was announced on May 1, 2009. Closure



of the Chrysler Stamping Plant, the city's major employer, brought extensive economic losses to the area. When the plant closed on July 31, 2010, approximately 1,260 full-time jobs were lost which resulted in an income tax revenue loss for the city. The proposed CornerStone Business Park will be a hub for manufacturing and distribution and will bring in a significant amount of jobs to the area as well as provide revenue to both the city of Twinsburg and the State.



2.0 REGULATORY DOCUMENTATION

2.1 JURISDICTIONAL WATERS DETERMINATION

CEC conducted a Preliminary Jurisdictional Waters Determination (PJWD) and submitted a report to the U.S. Army Corps of Engineers (USACE) dated July 8, 2011 as well as an addendum letter to the PJWD report dated September 20, 2011. The PJWD Report and Addendum letter are attached as Appendix D. The USACE issued a jurisdictional determination letter for the Site on December 28, 2011 and verified 3.82 acres of jurisdictional wetlands and 0.41 acre of isolated wetlands. Table 1 summarizes the verified waters on the Site. A copy of the verification letter is attached as Appendix E. The verified onsite waters are depicted on Figure 2.

**TABLE 1
SUMMARY OF VERIFIED JURISDICTIONAL AND ISOLATED WATERS**

| ID | Habitat Type | Jurisdictional or Isolated | Wetland Acreage |
|-----------------------------|---------------------|-----------------------------------|------------------------|
| Wetland A | Forested | Jurisdictional | 0.07 |
| Wetland B | Forested | Jurisdictional | 2.39 |
| Wetland C | Forested | Jurisdictional | 0.15 |
| Wetland D | Forested | Jurisdictional | 0.26 |
| Wetland E | Forested | Jurisdictional | 0.01 |
| Wetland F | Emergent | Jurisdictional | 0.01 |
| Wetland G | Scrub/Shrub | Isolated | 0.08 |
| Wetland H | Emergent | Isolated | 0.33 |
| Linear Wetland 1 | Emergent | Jurisdictional | 0.03 |
| Linear Wetland 2 | Emergent | Jurisdictional | 0.13 |
| Linear Wetland 3 | Emergent | Jurisdictional | 0.01 |
| Linear Wetland 4 | Emergent | Jurisdictional | 0.02 |
| Linear Wetland 5 | Emergent | Jurisdictional | 0.60 |
| Linear Wetland 6 | Emergent | Jurisdictional | 0.02 |
| Linear Wetland 7 | Emergent | Jurisdictional | 0.06 |
| Linear Wetland 8 | Emergent | Jurisdictional | 0.02 |
| Linear Wetland 9 | Emergent | Jurisdictional | 0.02 |
| Linear Wetland 10 | Emergent | Jurisdictional | 0.01 |
| Linear Wetland 11 | Emergent | Jurisdictional | 0.01 |
| Total Jurisdictional | | | 3.82 |
| Total Isolated | | | 0.41 |
| Total All Waters | | | 4.23 |



2.2 PREVIOUS AUTHORIZED IMPACTS

On December 23, 2011, the USACE authorized a Nationwide Permit (NWP) 39 to impact 0.12 acre of jurisdictional wetlands (Linear Wetlands 1, 2, and 4) for the purposes of constructing stormwater detention ponds (USACE #2011-00912). A copy of the NWP 39 Authorization Letter is attached as Appendix F. This permit expired on March 18, 2013.

These authorized impacts did not occur due to the fact the stormwater detention ponds were refigured to avoid the existing railroad system. Impacts to Linear Wetlands 1, 2, and 4 will be incorporated in the CornerStone Business Park design. However, 0.20 acre of wetland mitigation credit was purchased from the Trumbull Creek Wetlands Mitigation Bank. Therefore, we are requesting that the 0.20 acre of wetland mitigation credit be used towards the mitigation credit required for the current permit.

The verification of transfer of funds from the Ohio Wetland Foundation-Trumbull Creek Wetlands Mitigation Bank is attached as Appendix G.

In 2012, a 138,000 square foot distribution building, Building Number 8, was constructed in the existing parking area, north of Wetland D. Please note that this building is not included in the alternatives analysis. Also, no wetlands were impacted during the construction of this building.

2.3 WATER QUALITY ASSESSMENT

Prior to initiating a discharge of dredge or fill material into jurisdictional or isolated wetlands, Ohio Wetland Water Quality Standards (Ohio Administrative Code 3745-1-50 through 3745-1-54) require assessment of wetland quality and designation of a wetland quality category (Category 1, 2, or 3). Category 1 wetlands are typically highly disturbed, have low ecological value, and have the least stringent criteria governing their use or replacement. In contrast, Category 3 wetlands are typically rare or highly valuable wetlands and can only be disturbed when there is a demonstrated public need for the project.

Delineated on-site wetland areas were evaluated using the *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) published John Mack (2001) of the OEPA. A preliminary wetland category was determined for each wetland based on interpretation of ORAM results in accordance with narrative criteria in OAC 3745-1-54(C) and guidance in a draft document by John Mack titled *ORAM v. 5.0 Quantitative Score Calibration* (2000).

Copies of the ORAM forms are attached as Appendix H. The preliminary scores for all on-site wetlands are summarized below in Table 2.



TABLE 2
SUMMARY OF PRELIMINARY ORAM SCORES FOR
ON-SITE WETLANDS

| ID | Habitat Type | ORAM Score | Wetland Category |
|-------------------|---------------------|-------------------|-------------------------|
| Wetland A | Forested | 32 | 1 or 2 Grey Zone |
| Wetland B | Forested | 41.5 | Modified 2 |
| Wetland C | Forested | 42.5 | Modified 2 |
| Wetland D | Forested | 35.5 | Modified 2 |
| Wetland E | Forested | 36 | Modified 2 |
| Wetland F | Emergent | 32 | 1 or 2 Grey Zone |
| Wetland G | Scrub/Shrub | 16 | 1 |
| Wetland H | Emergent | 25 | 1 |
| Linear Wetland 1 | Emergent | 19 | 1 |
| Linear Wetland 2 | Emergent | 19 | 1 |
| Linear Wetland 3 | Emergent | 19 | 1 |
| Linear Wetland 4 | Emergent | 19 | 1 |
| Linear Wetland 5 | Emergent | 20 | 1 |
| Linear Wetland 6 | Emergent | 20 | 1 |
| Linear Wetland 7 | Emergent | 20 | 1 |
| Linear Wetland 8 | Emergent | 20 | 1 |
| Linear Wetland 9 | Emergent | 19 | 1 |
| Linear Wetland 10 | Emergent | 20 | 1 |
| Linear Wetland 11 | Emergent | 20 | 1 |

2.4 THREATENED AND ENDANGERED SPECIES

Coordination with Ohio Department of Natural Resources, Ohio Biodiversity Database Program

CEC coordinated with the Ohio Biodiversity Database (OBD) records maintained by the Ohio Department of Natural Resources (ODNR) Division of Wildlife, to determine whether there were known occurrences of the following on the Site:

- significant breeding/nonbreeding bird concentration areas;
- threatened or endangered species; and/or;
- high quality wetlands.

CEC has received a response from the ODNR dated June 9, 2011 stating that there are no records of the above listed occurrences. The correspondence letters are included in Appendix I.



Coordination with United States Fish & Wildlife Service

CEC coordinated with Ms. Angela Boyer of the United States Fish & Wildlife Service (USFWS) to determine whether there were any known occurrences on the Site for federally listed endangered, threatened, or candidate species. Also, as a precautionary measure CEC conducted an Indiana Bat survey on June 15 and 16, 2011. No Indiana Bats were captured during the survey. An Indiana bat survey report and request for information dated June 30, 2011 was submitted.

CEC received a response to our June 30, 2011 submittal from the USFWS on July 25, 2011 indicating that the Indiana bat, an endangered species, have been captured within 2.5 miles of the Site. USFWS has recommended that tree clearing on the Site only occur between November 15 and March 15 to avoid impacts to Indiana Bats. The USACE also recommended that the project proposal be modified to incorporate seasonal tree clearing restrictions and be resubmitted for consultation.

The USFWS also indicated that Site lies within the range of the northern monkshood (*Aconitum noveboracense*) and the bald eagle (*Haliaeetus leucocephalus*). However, USFWS does not anticipate impacts to these species.

On November 2, 2011, CEC submitted revised site plans pertaining to the NWP 39. The revised site plan demonstrated areas to be cleared, during the recommended seasonal tree clearing dates, in order to facilitate the construction of the proposed detention basins.

On November 7, 2011, CEC received a response to our November 2, 2011 submittal indicating that they do not anticipate any indirect adverse effects on the Indiana bats from the amount of clearing proposed. USFWS requested that they be contacted if additional clearing is proposed to provide technical assistance regarding the Indiana bat.

On February 1, 2013, CEC coordinated with USFWS informing them that the remainder of the forested area on Site is proposed to be cleared between the recommended seasonal tree clearing dates of November 15 and March 15 to avoid impacts to the Indiana bat.

On February 12, 2013, CEC received a response to our February 1, 2013 submittal indicating that due to the presence of Indiana bat habitat on the Site, Section 7 consultation needs to be conducted. CEC is currently preparing a response to the February 12, 2013 USFWS letter.

The correspondence letters are included in Appendix J.



2.5 CULTURAL RESOURCES

Weller and Associates, Inc. conducted a literature review for the Site and determined that no previously recorded archaeological or architectural resources older than 50 years were located within the Site. A copy of the report by Weller and Associates is attached as Appendix K.

2.6 APPLICATION FORMS

On behalf of the Twinsburg Industrial Properties, CEC has prepared this application package to request Clean Water Act Section 401/404 authorization for proposed impacts to 2.43 acres of jurisdictional wetlands (Preferred Alternative) for the construction of an industrial business park in Twinsburg, Ohio. Additional information required for the Section 401/404 applications is discussed in Section 3.0. Application forms for the Section 401 Water Quality Certification and the Section 404 permit are attached as Appendix A and B, respectively.

On February 20, 2013 CEC submitted a General Isolated Wetland permit application to the OEPA to impact 0.41 acre of isolated wetlands.



3.0 ALTERNATIVES ANALYSIS

In accordance with Section 404(b) (1) guidelines, a Section 404 permit can only be issued for a “least environmentally damaging practicable alternative” for the project. Therefore, an alternative analysis is required for the Section 404 permit request to demonstrate that impacts to regulated aquatic resources have been avoided and minimized to the maximum extent practicable.

Ohio EPA also requires an alternatives analysis as part of the Section 401 certification request. According to OAC 3745-1-05, known as the "Antidegradation Rule", an analysis of the following three alternatives must be completed to fulfill the requirements of Section 10 of the Section 401 certification application:

- 1) Preferred Design Alternative, including mitigative techniques;
- 2) Minimal Degradation Alternative, including mitigative techniques; and,
- 3) Non-Degradation Alternative.

The following sections present an analysis of the viability of each alternative, a series of drawings that illustrate each alternative, and a resource impact summary for each alternative.

For each of the three alternatives above, a series of eleven items (10a through 10k) must be discussed. According to the USACE, it is understood that the alternatives analysis required for the Section 401 certification should satisfy the Section 404(b) (1) alternative analysis requirements.

3.1 PREFERRED ALTERNATIVE

10a) Construction Details

The preferred design involves the development of a community commercial, limited industrial, and heavy industrial business park. This layout was designed to accommodate two 2-story 40,000 square foot office buildings and eleven distribution buildings totaling 2,011,500 square feet. In addition, five storm water detention basins are projected. The design of the preferred alternative maximizes the most efficient use of the space providing crucial access to commercial and industrial facilities.

Approximately 2.43 acres of jurisdictional wetland will be impacted. Compensatory mitigation for proposed impacts will be addressed through the purchase of 5.0 acres of mitigation credit. The layout of the Preferred Alternative is included in Appendix L. Additional mitigation details are located in Subheading 10k.



10b) **Biological and Physical Impacts on Water Quality**

Implementation of the preferred alternative would result in a lowering of water quality of the onsite wetlands, however, the lowering of water quality is justified by the social and economic benefits of this project (refer to Section 10 h). Moreover, proposed wetland mitigation would be implemented off-site through wetland mitigation banking.

Impacts on Rare, Threatened, or Endangered Species

Ohio Department of Natural Resources Ohio Biodiversity Database Program

CEC coordinated with the Ohio Biodiversity Database records maintained by the ODNR Division of Wildlife, to determine whether there were no known occurrences of the following on the Site:

- significant breeding/nonbreeding bird concentration areas;
- threatened or endangered species; and/or;
- high quality wetlands.

CEC received a response from the ODNR stating that there are no records of the above listed occurrences. The correspondence letters are included in Appendix I.

Coordination with United States Fish & Wildlife Service

CEC coordinated with Ms. Angela Boyer of the USFWS to determine whether there were any known occurrences on the Site for federally listed endangered, threatened, or candidate species.

As a precautionary measure, on behalf of our client, CEC conducted an Indiana bat survey on June 15 and 16, 2011. No Indiana Bats were captured during the survey. An Indiana bat survey report and request for information dated June 30, 2011 was submitted.

CEC received a response to our June 30, 2011 submittal from the USFWS on July 25, 2011 indicating that the Indiana bat, an endangered species, have been captured within 2.5 miles of the Site. USFWS has recommended that tree clearing on the Site only occur between November 15 and March 15 to avoid impacts to Indiana Bats. The USACE also recommended that the project proposal be modified to incorporate seasonal tree clearing restrictions and be resubmitted for consultation.



The USFWS also indicated that Site lies within the range of the northern monkshood (*Aconitum noveboracense*) and the bald eagle (*Haliaeetus leucocephalus*). However, USFWS does not anticipate impacts to these species.

On November 2, 2011, CEC submitted revised site plans pertaining to the NWP 39. The revised site plan demonstrated areas to be cleared, during the recommended seasonal tree clearing dates, in order to facilitate the construction of the proposed detention basin.

On November 7, 2011, CEC received a response to our November 2, 2011 submittal indicating that they do not anticipate any indirect adverse effects on the Indiana bats from the amount of clearing proposed. USFWS requested that they be contacted if additional clearing is proposed to provide technical assistance regarding the Indiana bat.

On February 1, 2013, CEC coordinated with USFWS informing them that the remainder of the forested area on Site is proposed to be cleared between the recommended seasonal tree clearing dates of November 15 and March 14 to avoid impacts to the Indiana bat.

On February 12, 2013, CEC received a response to our February 1, 2013 submittal indicating that due to the presence of Indiana bat habitat on the Site, Section 7 consultation needs to be conducted. CEC is currently preparing a response to the February 12, 2013 USFWS letter.

The correspondence letters are included in Appendix J.

10c) **Cost Effectiveness**

The Preferred Alternative design is both technically feasible and cost effective. The Preferred Alternative could provide 3,200 jobs and generate up to \$128 million in payroll within 10 years.

10 d) **Sewage Facility**

The Site is not part of a regional sewer line project.

10 e) **Local Watershed Group**

Area watershed groups in the general vicinity of the Site include the Tinkers Creek Watershed Land Conservancy and the Tinkers Creek Watershed Partners.

Proposed Projects for the Local Region

No known projects are located in the immediate vicinity of the Site.



10 f) **Water Pollution Controls**

In accordance with OAC 3745-38, prior to initiation of on-site construction activities, the developer of the Site will obtain an Ohio General National Pollution Discharge Elimination System (NPDES) permit for storm water discharges associated with proposed construction activities. A Storm Water Pollution Prevention Plan (SWPPP) will list best management practices to be implemented throughout the duration of construction. The BMP's will consist of erosion controls such as silt fencing, temporary seeding, or mulching.

10 g) **Human Health Impacts**

Impacts to human health or significant water resources are not anticipated because of this project.

10 h, i, and j) **Jobs and Revenues Lost and Gained**

The Site is located in northeast Summit County in Twinsburg, Ohio. Over the last few years the city has experienced economic downfall as a result of the Chrysler Bankruptcy. Closure of the Chrysler Stamping Plant, the City's major employer, on July 31, 2010 brought extensive economic losses to the area. Approximately 1,260 full-time jobs were lost which also resulted in an income tax revenue loss for the city. The proposed CornerStone Business Park will bring in a significant amount of jobs to the area as well as provide revenue to both the city of Twinsburg and the State. The social, economic, and environmental benefits are outlined in Table 5.



TABLE 5

| SUMMARY OF SOCIAL, ECONOMIC, AND ENVIRONMENTAL BENEFITS | | | |
|--|--|-----------------------------------|-------------------------------|
| | PREFERRED DESIGN | MINIMAL DEGRADATION DESIGN | NON-DEGRADATION DESIGN |
| No. of buildings/ square feet | 13*/ 2,091,500 ft ² | 12*/1,939,500 ft ² | 12*/1,460,700 ft ² |
| New Permanent Jobs | 3,200 jobs over 10 years | 2,900 jobs over 10 years | 2,200 jobs over 10 years |
| Est. Payroll \$\$ | \$128 million over 10 years | \$116 million over 10 years | \$88 million over 10 years |
| Est. Payroll Taxes | 2.5 million over 10 years | 2.3 million over 10 years | 1.7 million over 10 years |
| New Temporary Jobs | Not known at this time | Not known at this time | Not known at this time |
| Est. Temporary Payroll | Not known at this time | Not known at this time | Not known at this time |
| Est. Temporary Taxes | Not known at this time | Not known at this time | Not known at this time |
| Other Tax \$\$ | The Preferred Alternative is estimated to have \$203 million in market property value and \$4 million in unabated property taxes | | |
| Local Taxes Generated | 2.5 million @ 2% | 2.3 million @ 2% | 1.7 million @ 2% |
| State Taxes Generated | 4.5 million @ 3.5 % | 4.0 million @ 3.5 % | 3.0 million @ 3.5 % |
| Land Donated to Community (acres) | *see environmental benefit for wetland mitigation alternatives | | |
| County Unemployment Rate | 6.2% - Ohio Department of Job and Family Services December 2012 | | |
| County Poverty Rate | 16.6% - U.S. Census Estimate for 2011 | | |



| SUMMARY OF SOCIAL, ECONOMIC, AND ENVIRONMENTAL BENEFITS | | | |
|--|---|-----------------------------------|-------------------------------|
| | PREFERRED DESIGN | MINIMAL DEGRADATION DESIGN | NON-DEGRADATION DESIGN |
| Environmental Benefit's Lost or Gained | <p>Implementation of the Preferred Alternative or the Minimal Degradation Alternative would result in lowering water quality of the onsite wetlands. However, proposed offsite mitigation would provide an ecologically beneficial opportunity to compensate for onsite impacts.</p> <p>The Non-degradation Alternative would not impact the on-site wetlands; therefore, environmental benefits to on-site wetlands would not be gained or lost.</p> | | |
| Social Benefit | The community will benefit by new job opportunities and by an increase in local taxes generated. | | |
| Recreational Benefit | N/A | | |

*Figures do not include existing building #8.

10 k) **Mitigation Techniques**

CEC proposes to compensate for impacts to 2.43 acres of onsite jurisdictional wetlands by the purchase of wetland mitigation credit. CEC anticipates that the wetland mitigation ratios for proposed impacts will be a combination of 1.5:1, 2:1, and 2.5:1. Given the 0.20-acre of previously purchased but unused credit, a total of 5.0 acres of compensatory wetland mitigation from the both the Pearson Metro Park Wetland Mitigation Bank, for impacts to Category 1 wetlands (1.2 acres), and the Trumbull Creek Wetland Mitigation Bank, for impacts to Category 2 wetlands (3.8 acres), would be proposed as summarized in Table 6. Copies of the mitigation agreements are attached as Appendix O.

CEC attempted to identify a wetland mitigation bank located within the same watershed as the Site for those proposed impacts to Category 2 wetlands, most of which are forested. The Granger Wetlands Mitigation Bank was identified however; this bank was very limited on available forested wetland credits (roughly about 2.5 acres) and could not meet our required need of forested wetland credits. As a result, CEC is proposing to compensate for impacts to Category 2 forested wetlands through the Trumbull Creek Wetland Mitigation Bank. Though Trumbull Creek's service area is not within Summit County, it is within Portage County, which is located only about 2.5 miles east of the Site. Trumbull Creek does have adequate in-kind credits available and is located in the adjacent watershed in which the proposed impacts will take place. Due to the fact that very limited in-kind credits are available within the watershed of the



Site, CEC believes that compensation through a bank located in an adjacent watershed will be an adequate form of mitigation as stated in the current Ohio Administrative Code § 3745-1-54 paragraph (E):

“There is a significant ecological reason that the mitigation location should not be limited to the mitigation location specified in table 1 and the proposed mitigation will result in a substantially greater ecological benefit. Generally, if compensatory mitigation is approved to occur outside of the watershed specified in paragraph (F) of this rule, it shall be located in a watershed which is adjacent to the watershed where the impact is proposed to occur, or has occurred.”

**TABLE 6
PREFERRED ALTERNATIVE MITIGATION RATIO REQUIREMENTS FOR
JURISDICTIONAL WETLAND IMPACTS**

| ID | Delineated Size (Acreage) | Proposed Impact (Acreage) | Avoidance (Acreage) | Wetland Category | Proposed Mitigation | Proposed Mitigation Requirement |
|-----------------------------|----------------------------------|----------------------------------|----------------------------|-------------------------|----------------------------|--|
| Wetland A | 0.07 | 0.07 | 0 | 1 or 2 Grey Zone | 2.5:1 | 0.18 |
| Wetland B | 2.39 | 1.0 | 1.39 | Modified 2 | 2.5:1 | 2.50 |
| Wetland C | 0.15 | 0.15 | 0 | Modified 2 | 2.5:1 | 0.38 |
| Wetland D | 0.26 | 0.26 | 0 | Modified 2 | 2.5:1 | 0.65 |
| Wetland E | 0.01 | 0.01 | 0 | Modified 2 | 2.5:1 | 0.03 |
| Wetland F | 0.01 | 0.01 | 0 | 1 or 2 Grey Zone | 2:1 | 0.02 |
| Linear Wetland 1 | 0.03 | 0.03 | 0 | 1 | 1.5:1 | 0.05 |
| Linear Wetland 2 | 0.13 | 0.13 | 0 | 1 | 1.5:1 | 0.20 |
| Linear Wetland 3 | 0.01 | 0.01 | 0 | 1 | 1.5:1 | 0.02 |
| Linear Wetland 4 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 5 | 0.60 | 0.60 | 0 | 1 | 1.5:1 | 0.90 |
| Linear Wetland 6 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 7 | 0.06 | 0.06 | 0 | 1 | 1.5:1 | 0.09 |
| Linear Wetland 8 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 9 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 10 | 0.01 | 0.01 | 0 | 1 | 1.5:1 | 0.02 |
| Linear Wetland 11 | 0.01 | 0.01 | 0 | 1 | 1.5:1 | 0.02 |
| Total Jurisdictional | 3.82 | 2.43 | 1.39 | | | 5.2* |

*Required mitigation ratio rounded to the nearest tenth



3.2 MINIMUM DEGRADATION ALTERNATIVE

10a) Construction Details

A Minimal Degradation Alternative would result in a loss of potential jobs, reduction in potential local and state taxes generated, reduction in usable square footage, and loss of a distribution facility with access to the rail system. The layout of the Site per the Minimal Degradation Alternative would allow for two 2-story 40,000 square foot office buildings and ten distribution buildings totaling 1,859,500 square feet. In addition, five storm water detention basins are projected. Approximately 0.92 acres of jurisdictional wetland would be impacted. The layout of the Minimal Degradation Alternative is presented in Appendix M.

10b) Biological and Physical Impacts on Water Quality

Implementation of the Minimal Degradation Alternative would result in a lowering of water quality of on-site wetlands, however, the lowering of water quality is justified by the social and economic benefits of this project (refer to Section 10 h). Moreover, proposed impacts will be compensated by the purchase of wetland mitigation credits.

Impacts on Rare, Threatened, or Endangered Species

For discussion on rare, threatened, or endangered species impacts, please see Section 3.1, subheading 10b.

Under the Minimal Degradation Alternative, no additional impacts or benefits to rare, threatened, or endangered species are anticipated.

10c) Cost Effectiveness

This alternative would be technically feasible; however, avoidance and minimization of impacts would result in a loss of developable land. The reduction of developable land translates to a loss of one 145,000 square foot distribution building and the reduction of one additional distribution facility from 91,000 to 84,000 square feet. The Preferred Alternative could generate up to \$128 million in payroll within 10 years, whereas the Minimal Degradation Alternative would likely achieve only \$116 million in payroll within 10 years.

10 d) Sewage Facility

The Site is not part of a regional sewer line project.



10 e) **Local Watershed Group**

Area watershed groups in the general vicinity of the Site include the Tinkers Creek Watershed Land Conservancy and the Tinkers Creek Watershed Partners.

Proposed Projects for the Local Region

No known projects are located in the immediate vicinity of the Site.

10 f) **Water Pollution Controls**

In accordance with OAC 3745-38, prior to initiation of on-site construction activities, the developer of the Site will obtain an Ohio General NPDES permit for storm water discharges associated with proposed construction activities. SWPPP will list best management practices that would be implemented throughout the duration of construction. The BMP's will consist of erosion controls such as silt fencing, temporary seeding, or mulching.

10 g) **Human Health Impacts**

Impacts to human health or significant water resources are not anticipated because of this project.

10 h, i, and j) **Jobs and Revenues Lost and Gained**

See the Table 5 located in the Preferred Alternative description, 10h & 10i (Section 3.1).

10 k) **Mitigation Techniques**

In the Minimal Degradation Alternative, 0.92 acres of jurisdictional wetland would be impacted. Given the 0.20-acre of previously purchased but unused credit, a total of 1.8 acres of compensatory wetland mitigation would be proposed as summarized in Table 7.



**TABLE 7
MINIMAL DEGRADATION ALTERNATIVE MITIGATION RATIO
REQUIREMENTS FOR JURISDICTIONAL WETLAND IMPACTS**

| ID | Delineated Size (Acreage) | Proposed Impact (Acreage) | Avoidance (Acreage) | Wetland Category | Proposed Mitigation | Proposed Mitigation Requirement |
|-----------------------------|----------------------------------|----------------------------------|----------------------------|-------------------------|----------------------------|--|
| Wetland A | 0.07 | 0.07 | 0 | 1 or 2 Grey Zone | 2.5:1 | 0.18 |
| Wetland B | 2.39 | 0.25 | 2.14 | Modified 2 | 2.5:1 | 0.63 |
| Wetland C | 0.15 | 0 | 0.15 | Modified 2 | N/A | |
| Wetland D | 0.26 | 0.26 | 0 | Modified 2 | 2.5:1 | 0.65 |
| Wetland E | 0.01 | 0.01 | 0 | Modified 2 | 2.5:1 | 0.03 |
| Wetland F | 0.01 | 0 | 0.01 | 1 or 2 Grey Zone | N/A | |
| Linear Wetland 1 | 0.03 | 0.03 | 0 | 1 | 1.5:1 | 0.05 |
| Linear Wetland 2 | 0.13 | 0.13 | 0 | 1 | 1.5:1 | 0.20 |
| Linear Wetland 3 | 0.01 | 0.01 | 0 | 1 | 1.5:1 | 0.02 |
| Linear Wetland 4 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 5 | 0.60 | 0 | 0.60 | 1 | N/A | |
| Linear Wetland 6 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 7 | 0.06 | 0.06 | 0 | 1 | 1.5:1 | 0.09 |
| Linear Wetland 8 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 9 | 0.02 | 0.02 | 0 | 1 | 1.5:1 | 0.03 |
| Linear Wetland 10 | 0.01 | 0.01 | 0 | 1 | 1.5:1 | 0.02 |
| Linear Wetland 11 | 0.01 | 0.01 | 0 | 1 | 1.5:1 | 0.02 |
| Total Jurisdictional | 3.82 | 0.92 | 2.9 | | | 2.0* |

*Required mitigation ratio rounded to the nearest tenth



3.3 NON-DEGRADATION ALTERNATIVE

10a) Construction Details

The Non-Degradation Alternative would reduce the acreage available to develop. This reduction in available developable land would result in less environmental impacts, however; it does not provide an economically viable alternative. This alternative would result in a loss of potential jobs, reduction in potential local and state taxes generated, reduction in usable square footage of several distribution facilities, complete loss of one distribution facility, and total loss of the rail system access. The layout of the Non-Degradation Alternative is included in Appendix N.

10b) Biological and Physical Impacts on Water Quality

Impacts (both positive and negative) to water quality are not anticipated in this alternative. With the Non-degradation Alternative, no impacts would be proposed, thus no mitigation would be required.

Impacts on Rare, Threatened, or Endangered Species

For discussion on rare, threatened, or endangered species impacts, please see Section 3.1, subheading 10b.

Under the Non-Degradation Alternative, no additional impacts or benefits to rare, threatened, or endangered species are anticipated.

10c) Cost Effectiveness

The Non-degradation Alternative does not provide an economically viable alternative to the preferred alternative and falls short of satisfying the basic project purpose as a result in the loss of developable land. The reduction of developable land translates to a loss of one 145,000 square foot distribution building and the reduction of four additional distribution facilities by 485,800 square feet total. Also, the remaining buildings would no longer have access to the rail system, an important amenity of the site. The Preferred Alternative could generate up to 3,200 jobs and \$128 million in payroll within 10 years, whereas the Non-Degradation Alternative would likely be greatly reduced to only 2,200 jobs and \$88 million in payroll within 10 years.

10 d) Sewage Facility

The Site is not part of a regional sewer line project.



10 e) **Local Watershed Group**

Area watershed groups in the general vicinity of the Site include the Tinkers Creek Watershed Land Conservancy and the Tinkers Creek Watershed Partners.

Proposed Projects for the Local Region

No known projects are located in the immediate vicinity of the Site.

10 f) **Water Pollution Controls**

In accordance with OAC 3745-38, prior to initiation of on-site construction activities, the developer of the Site will obtain an Ohio General NPDES permit for storm water discharges associated with proposed construction activities. A SWPPP will list best management practices that would be implemented throughout the duration of construction. The BMP's will consist of erosion controls such as silt fencing, temporary seeding, or mulching.

10 g) **Human Health Impacts**

Impacts to human health or significant water resources are not anticipated because of this project.

10 h & i) **Jobs and Revenues Lost and Gained**

See the Social Economic Justification table in the Preferred Alternative section 10 h & i (Section 3.1).

10 j) **Environmental Benefits Lost or Gained**

This alternative would not create permanent impacts to on-site wetlands nor would any compensatory mitigation be required, thus, there would be no lost or gained environmental benefits.

10 k) **Mitigation Techniques**

No permissible dredge or fill activities will take place under this alternative; therefore, a mitigation plan will not be developed.



4.0 CONCLUSIONS

On behalf of Twinsburg Industrial Properties, CEC has prepared this application package to request Clean Water Act Section 401/404 authorization for proposed impacts to 2.43 acres of jurisdictional wetlands for proposed CornerStone Business Park in Twinsburg, Ohio.

In accordance with Section 401/404 requirements, an analysis of Preferred Design, Minimal Degradation, and Non-Degradation Alternatives was conducted. Based on that analysis, it is believed that the Preferred Design Alternative is an efficient, technically feasible, and cost effective development plan. Although implementation of the Preferred Design Alternative will result in a lowering of the water quality wetlands, it is believed that the lowering of water quality is justified based on social and economic benefits (refer to Section 3.1, Table 5) associated with the proposed project. Furthermore, it is understood that proposed mitigation (refer to Section 3.1, Subheading 10k) would compensate for impacts to water quality caused by the proposed discharge of fill material.

While technically feasible, the Minimal Degradation Alternative is not cost effective because of the loss of developable land and square footage in building space. Implementation of the Non-Degradation Alternative would result in a greater reduction of developable land and square footage in building space, a loss of up to 1,000 permanent jobs, \$800,000 thousand in local taxes, and \$1.5 million in State taxes.



FIGURES



NORTH

REFERENCE
BING MAPS ROADS / ARCGIS MAP SERVICE:
HTTP://GOTO.ARCGISONLINE.COM/MAPS/WORLD_IMAGERY,
ACCESSED 2/13/2013.

P:\2011110-816-GIS\Maps\PI110826-0007_Figure_1.mxd LS:\2/13/2013 - akietaszek - LP:2/13/2013 1:58:34 PM - LExported:2/13/2013 2:55:28 PM



LEGEND

APPROXIMATE SITE BOUNDARY



Civil & Environmental Consultants, Inc.
8740 Orion Place, Suite 100 - Columbus, OH 43240
614-540-6633 · 888-598-6808
www.cecinc.com

TWINSBURG INDUSTRIAL PROPERTIES, LLC
CORNERSTONE BUSINESS PARK
TWINSBURG, SUMMIT COUNTY, OHIO

SITE LOCATION MAP

| | | | | | | | |
|-----------|-----------|-------------|-----|--------------|--------------------|---------|----------|
| DRAWN BY: | APK | CHECKED BY: | JMV | APPROVED BY: | <i>[Signature]</i> | FIGURE: | 1 |
| DATE: | 2/13/2013 | MAP SCALE: | NTS | PROJECT NO: | 110-816.0007 | | |

*Hand signature on file



DUTTON DRIVE

EAST AURORA ROAD

CHAMBERLAIN ROAD



LEGEND

| | |
|--|------------------------------------|
| | APPROXIMATE SITE BOUNDARY |
| | JURISDICTIONAL WETLAND |
| | ISOLATED WETLAND |
| | NON-JURISDICTIONAL RETENTION BASIN |
| | NON-JURISDICTIONAL SWALE |

REFERENCE
MICROSOFT VIRTUAL EARTH / BING IMAGERY
PROVIDED BY ESRI, ACCESSED 2/18/2013



Civil & Environmental Consultants, Inc.

8740 Orion Place, Suite 100 - Columbus, OH 43240
614-540-6633 • 888-598-6808
www.cecinc.com

TWINSBURG INDUSTRIAL PROPERTIES, LLC
CORNERSTONE BUSINESS PARK
TWINSBURG, SUMMIT COUNTY, OHIO

EXISTING CONDITIONS MAP

| | | | | | | | |
|-----------|-----------|-------------|-----------|--------------|--------------|-------------|---|
| DRAWN BY: | APK | CHECKED BY: | JMV | APPROVED BY: | JMV | FIGURE NO.: | 2 |
| DATE: | 2/18/2013 | MAP SCALE: | 1" = 300' | PROJECT NO.: | 110-816.0007 | | |



APPENDIX A

**APPLICATION FOR OHIO EPA SECTION 401
WATER QUALITY CERTIFICATION**

APPLICATION FOR OHIO EPA SECTION 401 WATER QUALITY CERTIFICATION

Effective October 1, 1996
Revised August, 1998

This application must be completed whenever a proposed activity requires an individual Clean Water Act Section 401 Water Quality Certification (Section 401 certification) from Ohio EPA. A Section 401 certification from the State is required to obtain a federal Clean Water Act Section 404 permit from the U.S. Army Corps Engineers, or any other federal permits or licenses for projects that will result in a discharge of dredged or fill material to any waters of the State. To determine whether you need to submit this application to Ohio EPA, contact the U.S. Army Corps of Engineers District Office with jurisdiction over your project, or other federal agencies reviewing your application for a federal permit to discharge dredged or fill material to waters of the State, or an Ohio EPA Section 401 Coordinator at (614) 644-2001.

The Ohio EPA Section 401 Water Quality Certification Program is authorized by Section 401 of the Clean Water Act (33 U.S.C. 1251) and the Ohio Revised Code Section 6111.03(P). Ohio Administrative Code (OAC) Chapter 3745-32 outlines the application process and criteria for decision by the Director of Ohio EPA. In order for Ohio EPA to issue a Section 401 certification, the project must comply with Ohio's Water Quality Standards (OAC 3745-1) and not potentially result in an adverse long-term or short-term impact on water quality. Included in the Water Quality Standards is the Antidegradation Rule (OAC Rule 3745-1-05), effective October 1, 1996, revised October, 1997 and May, 1998. The Rule includes additional application requirements and public participation procedures. **Because there is a lowering of water quality associated with every project being reviewed for Section 401 certification, every Section 401 certification applicant must provide the information required in Part 10 (pages 3 and 4) of this application.** In addition, applications for projects that will result in discharges of dredged or fill material to wetlands must include a wetland delineation report approved by the Corps of Engineers, a wetland assessment with a proposed assignment of wetland category (ies), official documentation on evaluation of the wetland for threatened or endangered species, and appropriate avoidance, minimization, and mitigation as prescribed in OAC 3745-1-50 to 3745-1-54. Ohio EPA will evaluate the applicant's proposed wetland category assignment and make the final assignment.

Information provided with the application will be used to evaluate the project for certification and is a matter of public record. If the Director determines that the application lacks information necessary to determine whether the applicant has demonstrated the criteria set forth in OAC Rule 3745-32-05(A) and OAC Chapter 3745-1, Ohio EPA will inform the applicant in writing of the additional information that must be submitted. The application will not be accepted until the application is considered complete by the Section 401 Coordinator. An Ohio EPA Section 401 Coordinator will inform you in writing when your application is determined to be complete.

Please submit the following to "Section 401 Supervisor, Ohio EPA/DSW, P.O. Box 1049, Columbus, Ohio 43216-1049:

- Four (4) sets of the completed application form, including the location of the project (preferably on a USGS quadrangle) and 8-1/2 x 11" scaled plan drawings and sections.
- One (1) set of original scaled plan drawings and cross-sections (or good reproducible copies).

(See Application Primer for detailed instructions)

1. The federal permitting agency has determined this project: (check appropriate box and fill in blanks)

- a. requires an individual 404 permit/401 certification- Public Notice # (if known) _____
- b. requires a Section 401 certification to be authorized by Nationwide Permit # _____
- c. requires a modified 404 permit/401 certification for original Public Notice # _____
- d. requires a federal permit under _____ jurisdiction identified by # _____
- e. requires a modified federal permit under _____ jurisdiction identified by # _____

Click to clear all entered information (on all 4 pages of this form)

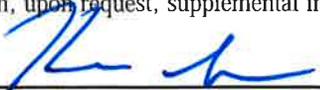
2. Application number (to be assigned by Ohio EPA):

3. Name and address of applicant: Telephone number during business hours:
 Kevin See () (Residence)
 Twinsburg Industrial Properties, LLC (317) 218-1641 (Office)
 800 East 96th Street
 Indianapolis, Indiana, 46240

3a. Signature of Applicant: Date:

4. Name, address and title of authorized agent: Telephone number during business hours:
 Jamie VanDusen () (Residence)
 Civil & Environmental Consultants, Inc. (CEC) (614) 310-0175 (Office)
 8740 Orion Place, Suite 100
 Columbus, Ohio 43240

4a. Statement of Authorization: I hereby designate and authorize the above-named agent to act in my behalf in the processing of this permit application, and to furnish, upon request, supplemental information in support of the application.

Signature of Applicant:  Date: 4/11/13

5. Location on land where activity exists or is proposed. Indicate coordinates of a fixed reference point at the impact site (if known) and the coordinate system and datum used.

Address:

2000 East Aurora Road, Twinsburg, Ohio- Latitude: North 41.3112, Longitude: West -81.4692
 Street, Road, Route, and Coordinates, or other descriptive location

| | | | | |
|-----------|--------|-----------|------|----------|
| 04110002 | Summit | Twinsburg | Ohio | 44087 |
| Watershed | County | Township | City | State |
| | | | | Zip Code |

6. Is any portion of the activity for which authorization is sought complete? Yes No
 If answer is "yes," give reasons, month and year activity was completed. Indicate the existing work on the drawings.

7. List all approvals or certifications and denials received from other federal, interstate, state or local agencies for any structures, construction, discharge or other activities described in this application.

| Issuing Agency | Type of Approval | Identification No. | Date of Application | Date of Approval | Date of Denial |
|----------------|-------------------------|--------------------|---------------------|------------------|----------------|
| USACE | Nationwide Permit | # 2011-00912 | 8/15/2011 | 12/23/2011 | |
| OEPA | Isolated Wetland Permit | Pending | 2/20/2013 | Pending | |

8. **DESCRIPTION OF THE ACTIVITY (fill in information in the following four blocks - 8a, 8b, 8c & 9)**

8a. Activity: Describe the Overall Activity:
 An industrial business park is proposed to be developed in the location of the former Chrysler Stamping Plant. The industrial development footprint (Preferred Alternative) will permanently impact 2.43 acres of jurisdictional wetlands. In addition, 0.41 acres of isolated wetlands will be permanently impacted and permitted through OEPA's Isolated Wetland Program.

8b. Purpose: Describe the purpose, need and intended use of the activity:

The purpose of the proposed activities is to construct the CornerStone Business Park. This business park will be mainly developed for industrial use, with a small portion developed to accommodate office buildings. The CornerStone Business Park will be a hub for manufacturing and distribution for the city of Twinsburg and surrounding areas.

8c. Discharge of dredged or fill material: Describe type, quantity of dredged material (in cubic yards), and quantity of fill material (in cubic yards).

The Preferred Design Alternative will result in the discharge of approximately 3,920 cubic yards of clean fill material into 2.43 acres of jurisdictional wetlands.

9. Waterbody and location of waterbody or upland where activity exists or is proposed, or location in relation to a stream, lake, wetland, wellhead or water intake (if known). Indicate the distance to, and the name of any receiving stream, if appropriate.

The proposed project will result in fill material placed into wetlands that have a hydrologic connection to both Brandywine Creek and Tinkers Creek, both are relatively permanent water tributaries to the Cuyahoga River, a traditional navigable water.

10. To address the requirements of the Antidegradation Rule, your application must include a report evaluating the:

- Preferred Design (your project) and Mitigative Techniques
- Minimal Degradation Alternative(s) (scaled-down version(s) of your project) and Mitigative Techniques
- Non-Degradation Alternative(s) (project resulting in avoidance of all waters of the state)

At a minimum, item a) below must be completed for the Preferred Design, the Minimal Degradation Alternative(s), and the Non-Degradation Alternative(s), followed by completion of item b) for each alternative, and so on, until all items have been discussed for each alternative (see Primer for specific instructions).

- 10a) Provide a detailed description of any construction work, fill or other structures to occur or to be placed in or near the surface water. Identify all substances to be discharged, including the cubic yardage of dredged or fill material to be discharged to the surface water.
- 10b) Describe the magnitude of the proposed lowering of water quality. Include the anticipated impact of the proposed lowering of water quality on aquatic life and wildlife, including threatened and endangered species (include written comments from Ohio Department of Natural Resources and U.S. Fish and Wildlife Service), important commercial or recreational sport fish species, other individual species, and the overall aquatic community structure and function. Include a Corps of Engineers approved wetland delineation.

- 10c) Include a discussion of the technical feasibility, cost effectiveness, and availability. In addition, the reliability of each alternative shall be addressed (including potential recurring operational and maintenance difficulties that could lead to increased surface water degradation.)
- 10d) For regional sewage collection and treatment facilities, include a discussion of the technical feasibility, cost effectiveness and availability, and long-range plans outlined in state or local water quality management planning documents and applicable facility planning documents.
- 10e) To the extent that information is available, list and describe any government and/or privately sponsored conservation projects that exist or may have been formed to specifically target improvement of water quality or enhancement of recreational opportunities on the affected water resource.
- 10f) Provide an outline of the costs of water pollution controls associated with the proposed activity. This may include the cost of best management practices to be used during construction and operation of the project.
- 10g) Describe any impacts on human health and the overall quality and value of the water resource.
- 10h) Describe and provide an estimate of the important social and economic benefits to be realized through this project. Include the number and types of jobs created and tax revenues generated and a brief discussion on the condition of the local economy.
- 10i) Describe and provide an estimate of the important social and economic benefits that may be lost as a result of this project. Include the effect on commercial and recreational use of the water resource, including effects of lower water quality on recreation, tourism, aesthetics, or other use and enjoyment by humans.
- 10j) Describe environmental benefits, including water quality, lost and gained as a result of this project. Include the effects on the aquatic life, wildlife, threatened or endangered species.
- 10k) Describe mitigation techniques proposed (except for the Non-Degradation Alternative):
 - Describe proposed Wetland Mitigation (see **OAC 3745-1-54** and Primer)
 - Describe proposed Stream, Lake, Pond Mitigation (see Primer)

11. Application is hereby made for a Section 401 Water Quality Certification. I certify that I am familiar with the information contained in this application and, to the best of my knowledge and belief, such information is true, complete and accurate. I further certify that I possess the authority to undertake the proposed activities or I am acting as the duly authorized agent of the applicant.



 Signature of Applicant

4/11/13

 Date

 4/12/13

 Signature of Agent

The application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in Block 3 has been filled out and signed.



APPENDIX B

DEPARTMENT OF ARMY PERMIT APPLICATION

17. DIRECTIONS TO THE SITE

From I-270 North, take Exit 18 onto OH-8 toward Northfield/Macedonia. Turn left on OH-8 and then right onto Macedonia Commons Blv. Turn right onto East Aurora Road. Continue for 2.5 miles. The site is on the right.

18. Nature of Activity (Description of project, include all features)

The proposed industrial park footprint (Preferred Alternative) will permanently impact 2.43 acres of Category 1 and Category 2 jurisdictional wetlands. In addition, 0.41 acres of Category 1 isolated wetlands will be permanently impacted and permitted through OEPA.

19. Project Purpose (Describe the reason or purpose of the project, see instructions)

The purpose of the project is to construct the proposed CornerStone Business Park in Twinsburg, Ohio. The site will be developed to accommodate community commercial, limited industrial, and heavy industrial use.

USE BLOCKS 20-23 IF DREDGED AND/OR FILL MATERIAL IS TO BE DISCHARGED

20. Reason(s) for Discharge

To facilitate the development of the proposed CornerStone Business Park.

21. Type(s) of Material Being Discharged and the Amount of Each Type in Cubic Yards:

| Type | Type | Type |
|-----------------------|-----------------------|-----------------------|
| Amount in Cubic Yards | Amount in Cubic Yards | Amount in Cubic Yards |

Approximately 3,920 cubic yds. of clean fill

22. Surface Area in Acres of Wetlands or Other Waters Filled (see instructions)

Acres 2.43 acres of jurisdictional wetlands
or
Linear Feet

23. Description of Avoidance, Minimization, and Compensation (see instructions)

Impacts to 2.43 acres of jurisdictional wetlands will be compensated by the purchase of 5.0 acres of wetland mitigation credit.

24. Is Any Portion of the Work Already Complete? Yes No IF YES, DESCRIBE THE COMPLETED WORK

25. Addresses of Adjoining Property Owners, Lessees, Etc., Whose Property Adjoins the Waterbody (if more than can be entered here, please attach a supplemental list).

a. Address- See attached sheet

City - State - Zip -

b. Address-

City - State - Zip -

c. Address-

City - State - Zip -

d. Address-

City - State - Zip -

e. Address-

City - State - Zip -

26. List of Other Certificates or Approvals/Denials received from other Federal, State, or Local Agencies for Work Described in This Application.

| AGENCY | TYPE APPROVAL* | IDENTIFICATION NUMBER | DATE APPLIED | DATE APPROVED | DATE DENIED |
|--------|-------------------|-----------------------|--------------|---------------|-------------|
| USACE | Nationwide Permit | #2011-00912 | 8/15/2011 | 12/23/2011 | |
| OEPA | Isolated Permit | Pending | 2/20/2013 | Pending | |
| | | | | | |
| | | | | | |

* Would include but is not restricted to zoning, building, and flood plain permits

27. Application is hereby made for permit or permits to authorize the work described in this application. I certify that this information in this application is complete and accurate. I further certify that I possess the authority to undertake the work described herein or am acting as the duly authorized agent of the applicant.






_____ SIGNATURE OF APPLICANT _____ DATE _____ SIGNATURE OF AGENT _____ DATE

The Application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in block 11 has been filled out and signed.

18 U.S.C. Section 1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up any trick, scheme, or disguises a material fact or makes any false, fictitious or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statements or entry, shall be fined not more than \$10,000 or imprisoned not more than five years or both.

CornerStone Business Park 404 Application Questions

25. Addresses of Adjoining Property Owners, Lessees, Etc., Whose Property Adjoins the Waterbody

1. Norfolk Southern Consolidated RR, 8530 Chamberlin Road, Twinsburg, Ohio 44087
2. PFP Twinsburg LLC, Chamberlin Road, Twinsburg, Ohio 44087
3. Carol Condominium Owners Association, East Aurora Road, Twinsburg, Ohio 44087
4. Twinsburg Township, 8776 Harvard Street, Twinsburg, Ohio 44087
5. Odell Moore, Cambridge Street, Twinsburg, Ohio 44087
6. Patrick Marquis, 1930 Cambridge Street, Twinsburg, Ohio 44087
7. Twinsburg Township, Eton Street, Twinsburg, Ohio 44087
8. WVH LLC, Eton Street, Twinsburg, Ohio 44087
9. Rynell Jackson, Rugby Street, Twinsburg, Ohio 44087
10. Larry Gains, 1875 Buchtel Street, Twinsburg, Ohio 44087
11. Emma White, 1878 Buchtel Street, Twinsburg, Ohio 44087
12. Janina Knighton, 1863 Case Street, Twinsburg, Ohio 44087
13. Kathleen Shorts, 1860 Case Street, Twinsburg, Ohio 44087
14. Larnie Zellner, 1849 Stanford Street, Twinsburg, Ohio 44087
15. Leo Williams, Stanford Street, Twinsburg, Ohio 44087



APPENDIX C

SITE PHOTOGRAPHS AND PHOTOGRAPH LOCATION MAP



Photograph 1: Wetland A looking northwest.



Photograph 2: Wetland A looking southeast.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 3: Wetland A connection to Linear Wetland 1 looking west.



Photograph 4: Forested portion of Wetland B looking southwest.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 5: Emergent portion of Wetland B looking south.



Photograph 6: View of Swale 3 connecting Wetland B to Wetland A.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 7: Wetland C looking northwest.



Photograph 8: Wetland D looking west.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 9: Wetland E looking south.



Photograph 10: View of Swale 1 connecting Wetland E to Wetland A.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 11: Southern portion of Swale 1 into Wetland E.



Photograph 12: Upland forested area.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 13: Wetland F looking west.



Photograph 14: View of Swale 2 looking northwest.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011



Photograph 15: Upland open field area looking south.



Photograph 16: Wetland G looking north.



Civil & Environmental Consultants, Inc.

Columbus, OH 43240

Ph: 614-540-6633 Toll Free: 888-598-6808

Austin • Boston • Charlotte • Chicago • Cincinnati • Cleveland • Detroit • Export • Indianapolis
• Nashville • North Central PA • Phoenix • Pittsburgh • St. Louis

Twinsburg Industrial Properties, LLC
CornerStone Business Park
Twinsburg, Summit County, Ohio
CEC Project 110-816

Photographs Taken on May 24, 2011