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Naperville Planning and Zoning Commission
City of Naperville
425 Aurora Street
Naperville, IL 60540

RE: Naperville Planning and Zoning Commission Agenda Item 12-1-084: Proposed Walmart Supercenter Store #1401-00 Adjacent to Springbrook Prairie Forest Preserve

Dear Commissioners:

I am Joe Suchecki, Naperville resident and the Natural Resources Volunteer Steward for the Forest Preserve District of DuPage County ("District") at Springbrook Prairie Forest Preserve. As the volunteer steward at Springbrook Prairie, I assist the District in the natural resource restoration of the preserve by conducting vegetation and wildlife surveys, coordinating and holding volunteer workday and education programs, and completing vegetation management such as herbiciding invasive species, cutting brush and trees, and collecting and planting native species seeds and plants

I have been the volunteer bird monitor and steward at Springbrook for 18 years, and probably know the site better than anyone else. Over that time period, Springbrook has been transformed into a high quality natural area that is particularly well known for its diverse and unique populations of nesting grassland bird species. Springbrook has been designated an Important Bird Area of statewide significance by the National Audubon Society and is currently going through the approval process as an Illinois Nature Preserve by the Illinois Nature Preserves Commission and the Forest Preserve District of DuPage County. The bottom line is that Springbrook Prairie is a high quality natural area of regional significance, and it is important that any adjacent land-use and development recognize and protect the ecological value of the site.

Walmart is proposing to construct a supercenter store on the Brach Brodie Property, and the proposed development is the subject of a Planning and Zoning Commission public hearing on September 19th. The new store will be bordered by Springbrook on the east and south. After reviewing the plans for the project, I have comments and recommendations on several issues. My recommendations are intended to assure that the development does not adversely impact Springbrook Prairie.

I want to emphasize to you that I do not represent the Forest Preserve District of DuPage

County and that the following views and recommendations are my own and do not necessarily reflect the positions of the District on any issue.

After reviewing the development plans available on the Commission website, I have the following concerns and recommendations.

1. The final site development plan needs to assure that storm water runoff from the Walmart does not adversely affect the wetlands and other adjacent habitats at Springbrook Prairie.

The proposed storm water plan simply discharges the water from the buildings and parking lot to the existing storm water retention ponds to the east and south of the development. I believe that those retention ponds eventually discharge to the west and to the wetland area behind the Lowe's building and into Springbrook Prairie. As such, the water quantity and quality will have a direct impact on Springbrook vegetation and the newly-created mitigation wetlands that were constructed at Springbrook by DuPage County.

The final plan needs to assure that the storm water and runoff is adequately filtered and treated so that it does not degrade the wetlands at Springbrook. Since the sensitive and high quality habitats at Springbrook may be impacted, additional settlement and natural filtration of the storm water from the Walmart property are needed. That should include some additional slough and wetland areas directly on the Walmart property to add natural filtration and treatment capacity prior to being discharged to the existing ponds. To that end, perhaps the area proposed as a 10-ft wide bikepath would be better utilized as an on-site wetland/runoff filter (not sure the proposed bike path adds very much value for the public).

Although perhaps beyond the existing city standards, I would like to see Walmart incorporate some innovative storm water management features into the proposed store and parking lot plan such as the use of permeable pavement and/or roof water collection and re-use systems that Walmart has used at other facilities. Such features would minimize the added run-off from the development and help assure that the development will not impact Springbrook.

2. The height of the lighting poles should be limited to 25 feet as per city standards.

Walmart has requested a variance to install lighting poles that are 42 ft tall. Those poles would be 17 feet taller than the Naperville standard height of 25 ft in commercial districts and would result in light polls that tower above the height of the proposed building. Such tall light poles would add significantly to the visual impact of the development as viewed from Springbrook Prairie to the south and east and should not be approved.

Although Walmart's rationale for a variance is related to the use of energy-saving LED bulb fixtures, the visual impacts of such tall poles from the adjacent natural area outweighs the potential energy savings. However, I see no reason why Walmart cannot use energy efficient LED lighting on the standard 25-ft poles. With 25-ft poles, the distribution and location of lighting fixtures would have to be re-designed, but Walmart can still realize energy and cost savings through the use of energy efficient LED fixtures. It is also important that light pollution

and intrusion into the adjacent natural habitats be minimized as noted in the Illinois Department of Natural Resources consultation letter.

3. Additional screening and fencing is needed to prevent garbage and litter from blowing into the wetlands and Springbrook from the south boundary of the development and recycling area.

The Walmart plan includes truck traffic, loading docks, and the recycling and trash areas on the south side of the building directly adjacent to the existing retention ponds and Springbrook. In fact, the recycling center is located to the south of the driveway, even closer to those areas.

I am very concerned about the potential for garbage and trash from those operations. Currently, I can tell you that there is always a lot of litter and trash blown into the preserve from the current Lowes store to the west. It is a considerable eyesore, and the plastic and other trash blows into the wetlands where it can affect aquatic life as well. I can only hope that Walmart will be a better neighbor than Lowes.

With the loading docks and the trash and recycling operations so close to the property boundary, I believe that additional fencing/containment along the south side of the paved areas is needed to serve as a barrier and to prevent windblown trash from entering the wetlands and Springbrook Prairie. I ask that Naperville work with Walmart to incorporate measures necessary to eliminate the potential for such windblown litter and trash from entering the ponds and preserve.

4. The use of trees for screening and landscaping purposes should not negatively affect prairie vegetation and grassland birds.

Conventional wisdom and public perception outside the natural resources/ecological community assumes that planting trees is always good. In fact, when working with native prairie landscapes and grassland birds, that is not the case. Prairie plants are adapted to full sun, and grassland birds find locations with even a few trees and shrubs as unacceptable habitat for nesting. It is a well-known and proven fact that grassland birds will avoid areas with trees and shrubs and will not nest in large areas adjacent to tree lines.

We have been very successful in actually increasing populations of threatened and severely declining grassland birds at Springbrook by removing trees and shrubs from the field as well as tree lines that break up the fields into smaller areas. Consequently, since improving habitat for grassland birds and re-establishing native prairie vegetation are the primary ecological objectives at Springbrook Prairie, it is important that the landscape plan for the Walmart does not adversely impact those resources by creating extensive tree lines for screening purposes.

After reviewing the landscape plan and the recommendation by Naperville staff to place more trees at the south end of the property, I believe that the currently proposed tree planting distribution will not adversely affect grassland bird habitats at Springbrook as long as the tree plantings remain directly adjacent to the paved areas to the south and east of the Walmart parking lot. There is an existing wetland buffer that is already not suitable habitat for grassland

bird species that creates sufficient distance from the proposed tree plantings to suitable grassland habitat so as to not decrease the value of the grasslands as nesting habitat.

However, I understand that there was some discussion by the Commission at the August 22nd Planning and Zoning Commission meeting about the need to increase visual screening of the building from the public using the trails at Springbrook. That discussion talked about using more trees to screen the views from the south and east. I believe that it is important that additional trees or tree lines not be used as a visual screening solution if they are closer to the Springbrook property line than what is currently proposed, e.g., perhaps on the south and east side of the existing ponds. Planting trees in any areas away from the proposed parking lots would have a very negative impact on the grassland birds and native prairie and should not be allowed.

In summary, I wanted to point out to the commission that for this particular development and site, additional trees are not always better. Here, adding more trees may actually degrade the habitats at Springbrook. However, in my opinion, the current tree-planting proposal should not adversely affect grassland bird habitat quality at Springbrook.

5. The proposed landscape plan needs to be revised to incorporate and utilize native prairie species.

Much of the time that I spend working at Springbrook, as well as many of the volunteer citizen workdays, involves removing and managing non-native invasive species including shrubs and trees. The introduction and invasion of non-native species into the preserve is one of the greatest threats to Springbrook and the District's efforts to re-establish native plant communities.

Many of those invasive and unwanted species enter the preserve from adjacent landscape and ornamental plantings. Two current examples that are particularly troublesome at Springbrook are increasing numbers of Bradford pear trees that are invading the grasslands and flowering rush that has been found along Springbrook Creek and adjacent wetlands. The flowering rush at Springbrook is the first occurrence of that invasive species in DuPage County, and its origin stems from ornamental wetland plantings around a couple of subdivision ponds upstream of the site.

The impact of such invasive species is the loss of native species and degradation of the habitat since invasive species tend to take over and dominate. In addition, efforts to control them create high costs in time, effort, and dollars.

The proposed landscape plan for the Walmart includes many non-native species. With the Walmart property being directly adjacent to Springbrook, the use of non-native species will undoubtedly increase the potential for additional invasive species being introduced to Springbrook. There are many trees, shrubs, and herbaceous plants in the proposed plant list that are simply not compatible with the native prairie vegetation and habitats at Springbrook. In my opinion, this has the greatest potential impact of the Walmart development on Springbrook.

Fortunately, there is a rather simple solution to this problem – develop a landscape plan that

uses native species. Use of native species and plantings also has the advantage of needing less maintenance and watering, and so should save Walmart money in the long run. Rather than creating a problem with a significant potential impact to Springbrook, a proper landscape plan using native prairie species for the site can actually add to the value to the prairie and the District's restoration efforts.

The proposed landscape plan needs to be revised to incorporate native prairie species before the final approval by the city.

With adequate resolution of the above issues, I believe that the construction and operation of a Walmart store at the proposed location can be developed with minimal or no impacts to Springbrook Prairie. I would like to see Walmart implement some of their innovative environmental and energy-savings programs and technology at the Naperville location. I hope that Walmart recognizes the unique nature of Springbrook Prairie in the Chicago region and will accept their responsibility to be a great neighbor for a great preserve. My hope is that Naperville staff, Forest Preserve staff, and Walmart design/engineering representatives will get together and develop a revised and acceptable plan for consideration and approval at the September 19th public hearing.

I would be happy to talk with you about these comments and answer any questions that you may have.

Sincerely,

Joe Suchecki

Joe Suchecki

Volunteer Springbrook Steward
Naperville Resident