



# Forest Preserve District of DuPage County

35580 Naperville Road • Wheaton, IL 60189-8761 • 630.933.7200 • Fax 630.933.7204 • TTY 800.526.0857

August 17, 2012

Planning and Zoning Commission  
City of Naperville  
400 S. Eagle Street  
Naperville, Illinois 60540

Re: Public Hearing Notice on Wal-Mart Property  
PIN 07-27-300-013 and 07-27-300-014  
Case # 12-1-084

Dear Chairman and Members of the Planning and Zoning Commission:

The Forest Preserve District of DuPage County recently received notice of a proposed Wal-Mart located at 75<sup>th</sup> Street and Bebee Drive. We appreciate receiving timely notification of such projects that may have an impact on our adjacent property (Springbrook Prairie Forest Preserve), and thank you for the opportunity to comment.

District Staff has reviewed the public hearing notice and the proposed project, and has the following comment at this time. Our Office of Natural Resources assisted the Illinois Department of Natural Resources (IDNR) in the consultation process regarding the proposed Wal-Mart development. IDNR submitted a letter dated August 1, 2012 to Christina Dudley, the engineering representative for the project. The City of Naperville was copied on that letter, and the Forest Preserve District supports the recommendations provided in that letter.

We hope you will allow the District the opportunity to review and comment on any major revisions that may be proposed as this project moves forward. Please consider this as the District's request that this letter be read and entered into the public record at the hearing on Wednesday, August 22, 2012.

Sincerely,

Bob Vick  
Deputy Director of Natural Resources

cc: D. "Dewey" Pierotti, Jr., President  
Carl Schultz, District 5 Commissioner  
John Oldenburg, Director of Natural Resources  
Kevin Stough, Director of Land Preservation



# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Pat Quinn, Governor  
Marc Miller, Director

August 1, 2012

Christina Dudley, PE, CPESC, LEED AP  
*CESO, Inc.*  
8534 Yankee Street, Suite 2B  
Dayton, Ohio 45458

RE: Wal-Mart Supercenter #1401-04  
IDNR Project #1300387

Dear Ms. Dudley;

This letter is in reference to the project recently submitted through the EcoCAT (Ecological Compliance Assessment Tool) website. The project is construction of a Wal-mart Supercenter store, parking lot and associated utilities. The initial report generated for this project indicated the presence of protected resources in the vicinity of the project location. Protected resources include Springbrook Prairie Illinois Natural Area Inventory (INAI) site, black rail (*Laterallus jamaicensis*), black-crowned night heron (*Nycticorax nycticorax*), least bittern (*Ixobrychus exilis*), loggerhead shrike (*Lanius ludovicianus*), northern harrier (*Circus cyaneus*), short-eared owl (*Asio flammeus*), and upland sandpiper (*Bartramia longicauda*), all of which are listed as threatened or endangered. Springbrook Prairie INAI site is essential habitat of the above listed species and a significant area for other grassland bird species such as long-eared owls and Henslow's sparrows.

Springbrook Prairie will be proposed for preliminary dedication at the 212<sup>th</sup> meeting of the Illinois Nature Preserve Commission as an Illinois nature preserve on September 11, 2012. Nature Preserve designation is the highest level of legal protection provided to natural resources in the State of Illinois. It is important to be aware of this adjacent protected resource. Information regarding the Nature Preserve designation can be found at the following web address: <http://dnr.state.il.us/inpc>. Additional links including the Illinois Natural Areas Preservation Act can also be found at this site.

The Department has completed its review of the project and determined that the action is likely to have an adverse impact on the avian species found in this unique habitat. To minimize these impacts, the Department recommends the following measures be implemented by the developer and incorporated in the IEPA's project authorization. The Department has three major concerns; hydrology, lighting, and litter.

**Recommendation # 1:**

Direct runoff to permeable areas and/or utilize stormwater for reuse by;

- Directing roof runoff towards permeable surfaces, drywells, French drains, vegetated swales, or other BMPs instead of non-permeable surfaces;
- Grading impervious surfaces to direct runoff to permeable areas, utilizing level spreaders or other methods to distribute the impervious runoff onto pervious surfaces;
- Using cisterns, retention structures or rooftops to store precipitation or runoff for reuse; and
- Designing pavement edges (e.g., curb cuts) in order to direct water to permeable landscaped areas.

**Recommendation # 2:**

Vegetated filter strips should be planted with native vegetation to assist with pollutant adsorption, soil stabilization, and provide some water absorption. Filter strips receive runoff thereby slowing runoff speed, trapping sediment and pollutants, and reducing the rate and volume of storm water runoff from parking lots. Native vegetation is recommended for all areas that will be landscaped, including the detention basin. See the USDA Natural Resource Conservation Service "Illinois Native Plant Guide" and the City of Chicago's, "A Guide to Storm water Best Management Practices" for assistance. Not only will native landscaping aid in pollutant absorption, but it will stabilize the soil, reduce soil erosion, reduce the need for fertilizers and pesticides and will dissuade Canada Geese from congregating near the basins. Upon request, FPDDC Office of Natural Resources can provide a list of native species that occur at Springbrook Prairie. This would provide an easy option of species list development for all landscaped areas.

**Recommendation # 3:**

Salt contamination is typically a problem with large parking lots like these. Prevailing winds from the west can cause road salt to form aerosol dusts that can be damaging to aquatic life and native plants. A road salt management program should be in place to limit the amount of salt used and leftover after snowstorms. The use of a non-sodium chloride based product is highly recommended. Sweeping the parking lot weekly is also recommended.

**Recommendation # 4:**

In highly urbanized areas non-permeable surfaces, especially public parking areas, likely contain salt (and their cyanide based anti-clumping agents), petroleum products, anti-freeze, and any other pollutants that are washed away during rain events and are absorbed when snow accumulates on plowed surfaces. Therefore, all proposed detention/retention areas should be designed in a manner to "clean" as much water as possible before it is released into any natural area or groundwater system. Therefore it is our recommendation to create multiple settling ponds, planted with native vegetation, at descending elevations for all storm water runoff before water is released off site. Use of an inverted discharge structure is desirable to keep water leaving the basin as free of pollutants as possible.

**Recommendation # 5:**

Silt fences, soil stabilization and runoff control measures should be incorporated throughout the entire construction site and during the entire construction period. These should be inspected on a daily basis during construction to ensure they are working properly.

**Recommendation # 6:**

When artificial lighting is considered essential, mercury vapor, metal halide, or fluorescent lamps should be used in this order of preference. High-pressure sodium lamps should be avoided and even low-intensity incandescent is best excluded due to its high output of infrared and potential impact. Fixtures shielded so that all of the light is directed toward the ground onto vehicular traffic and away from plants should be employed to reduce light pollution and harm to trees. In all cases, up lighting and shining light over great horizontal distances should be avoided. Lights should be turned off or dimmed during off-peak hours to avoid continuous lighting of trees, which has the greatest potential for upsetting normal growth patterns. Commercial lighting tends to have a greater impact from fugitive light. With commercial buildings, lights are usually larger, brighter, placed on higher standards, and may be left on during all hours of darkness. This can draw night-flying insects in and away from their normal locations, impacting the food availability of nocturnal predators and degrading ecological conditions. Placing lighting on timers alleviates some of this concern.

**Recommendation # 7:**

Fencing and a vegetative buffer strip should be placed on the east and south sides of the property. The vegetative buffer strip serves the dual purpose of preventing litter from entering the INAI site and slowing run-off. The fencing should be inspected weekly and litter removed. A small berm along the edge of the property planted with native shrubs and trees is recommended. This would initially help retain some of the litter and decrease or minimize possible salt intrusion into the preserve. In a number of years the trees may also provide a bit of a screen to reduce some of the light penetration as well, at least during the growing season. Upon request, FPDDC Office of Natural Resources can provide a list of native species that occur at Springbrook Prairie. This would provide an easy option of species list development for all landscaped areas.

Consultation on the part of the Department is completed. Please notify the Department of the decision regarding these recommendations, whether the applicant will:

- Proceed with the action as originally proposed;
- Modified the action per Department recommendations (please specify which measures if not all will be required); or
- Forgo the action.

This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this review.

Sincerely,

A handwritten signature in black ink that reads "Tracy Evans". The signature is written in a cursive, flowing style.

Tracy Evans  
Impact Assessment  
(217) 782-7940

cc:

Jenny Skufca, Illinois Nature Preserves Commission  
Eric Neidy, Forest Preserve District of DuPage County  
IEPA permits section  
Transportation, Engineering and Development, Naperville  
JD Moon, Terracon



August 31, 2012

Ms. Tracy Evans  
Impact Assessment  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, Illinois 62702-1271

RE: Wal-Mart Supercenter #1401-04  
IDNR Project # 1300387

Dear Ms. Evans:

This letter is in response to your EcoCAT consultation letter dated August 1, 2012. Wal-Mart's reply is in ***bold italic*** after each of IDNR's recommendations.

**Recommendation # 1**

Direct runoff to permeable areas and/or utilize stormwater for reuse by;

- Directing roof runoff towards permeable surfaces, drywells, French drains, vegetated swales, or other BMPs instead of non-permeable surfaces;
- Grading impervious surfaces to direct runoff to permeable areas, utilizing level spreaders or other methods to distribute the impervious runoff onto pervious surfaces;
- Using cisterns, retention structures or rooftops to store precipitation or runoff for reuse; and
- Designing pavement edges (e.g., curb cuts) in order to direct water to permeable landscaped areas.

**Response #1:**

***The existing detention basin was designed and approved as part of the Master Plan Design which includes the Wal-Mart property. The grading for the Wal-Mart property will direct stormwater runoff into the existing detention basin located to the east and south of the property. Per the City of Naperville Stormwater Management Permit Application for The Brach/Brodie Property dated September 2002 by Christopher B Burke Engineering, "Best management practices incorporated into the site design include a stormwater detention facility that has been designed to maximize the resident time of incoming runoff to settle out contaminants and sediment particles prior to being discharged through the outlet structure. The stormwater pond has been designed with wetland plantings that will assist in filtering the runoff."***

**Recommendation # 2:**

Vegetated filter strips should be planted with native vegetation to assist with pollutant adsorption, soil stabilization, and provide some water absorption. Filter strips receive runoff thereby slowing runoff speed,



trapping sediment and pollutants, and reducing the rate and volume of storm water runoff from parking lots. Native vegetation is recommended for all areas that will be landscaped, including the detention basin. See the USDA Natural Resource Conservation Service "Illinois Native Plant Guide" and the City of Chicago's, "A Guide to Storm water Best Management Practices" for assistance. Not only will native landscaping aid in pollutant absorption, but it will stabilize the soil, reduce soil erosion, reduce the need for fertilizers and pesticides and will dissuade Canada Geese from congregating near the basins. Upon request, FPDDC Office of Natural Resources can provide a list of native species that occur at Springbrook Prairie. This would provide an easy option of species list development for all landscaped areas.

**Response #2:**

*The existing detention basin has various different varieties of native plants including Water plantain, Beggars ticks sp., Blunt spike rush, Soft rush, Duckweed, Common reed, Floating leaf pondweed, Curly dock, Sandbar willow and Narrow-leaf cattail. The detention basin slopes were planted with prairie species including, Goatsbeard, Purple prairie clover, Coreopsis and Bee balm. The site design includes a stormwater detention facility that has been designed to maximize the resident time of incoming runoff to settle out contaminants and sediment particles prior to being discharged through the outlet structure. The stormwater pond has been designed with native wetland plantings that will assist in filtering the runoff.*

**Recommendation # 3:**

Salt contamination is typically a problem with large parking lots like these. Prevailing winds from the west can cause road salt to form aerosol dusts that can be damaging to aquatic life and native plants. A road salt management program should be in place to limit the amount of salt used and leftover after snowstorms. The use of a non-sodium chloride based product is highly recommended. Sweeping the parking lot weekly is also recommended.

**Response #3:**

*Snow removal policies are coordinated at a local level, utilizing regional labor and resources. While specific contractors have yet to be selected, it can be anticipated that similar practices will be employed consistent with the other uses bordering the preserve (Lowe's Staples, Sports Fitness, Costco, 75<sup>th</sup> Street, Beebe Drive, Book Road, Plainfield-Naperville Road, 87<sup>th</sup> Street).*

**Recommendation # 4:**

In highly urbanized areas non-permeable surfaces, especially public parking areas, likely contain salt (and their cyanide based anti-clumping agents), petroleum products, anti-freeze, and any other pollutants that are washed away during rain events and are absorbed when snow accumulates on plowed surfaces. Therefore, all proposed detention/retention areas should be designed in a manner to "clean" as much water as possible before it is released into any natural area or groundwater system. Therefore it is our recommendation to create multiple settling ponds, planted with native vegetation, at descending elevations for all storm water runoff before water is



released off site. Use of an inverted discharge structure is desirable to keep water leaving the basin as free of pollutants as possible.

**Response #4:**

*The existing detention basin was approved, constructed and established as a part of the master design for the overall development. The existing wetland plantings and shallow permanent pool provide for settling and filtering of pollutants.*

**Recommendation # 5:**

Silt fences, soil stabilization and runoff control measures should be incorporated throughout the entire construction site and during the entire construction period. These should be inspected on a daily basis during construction to ensure they are working properly.

**Response #5:**

*A Stormwater Pollution Prevention Plan will be in place to maintain erosion and runoff control measures for the entire construction site from the beginning to the end of construction and will be inspected daily.*

**Recommendation # 6:**

When artificial lighting is considered essential, mercury vapor, metal halide, or fluorescent lamps should be used in this order of preference. High-pressure sodium lamps should be avoided and even low-intensity incandescent is best excluded due to its high output of infrared and potential impact. Fixtures shielded so that all of the light is directed toward the ground onto vehicular traffic and away from plants should be employed to reduce light pollution and harm to trees. In all cases, up lighting and shining light over great horizontal distances should be avoided. Lights should be turned off or dimmed during off-peak hours to avoid continuous lighting of trees, which has the greatest potential for upsetting normal growth patterns. Commercial lighting tends to have a greater impact from fugitive light. With commercial buildings, lights are usually larger, brighter, placed on higher standards, and may be left on during all hours of darkness. This can draw night-flying insects in and away from their normal locations, impacting the food availability of nocturnal predators and degrading ecological conditions. Placing lighting on timers alleviates some of this concern.

**Response #6:**

*LED light fixtures have been selected for this site to both minimize infrared light and substantially reduce energy consumption. The fixtures have been selected to reduce any light trespass off the property to a level below what the code allows. No "up lighting" is used in this project. The photometrics were based on the model lighting ordinance (June 2011) to promote responsible outdoor lighting practices. This ordinance was co-sponsored by the International Dark Sky Association.*



**Recommendation # 7:**

Fencing and a vegetative buffer strip should be placed on the east and south sides of the property. The vegetative buffer strip serves the dual purpose of preventing litter from entering the INAI site and slowing run-off. The fencing should be inspected weekly and litter removed. A small berm along the edge of the property planted with native shrubs and trees is recommended. This would initially help retain some of the litter and decrease or minimize possible salt intrusion into the preserve. In a number of years the trees may also provide a bit of a screen to reduce some of the light penetration as well, at least during the growing season. Upon request, FPDDC Office of Natural Resources can provide a list of native species that occur at Springbrook Prairie. This would provide an easy option of species list development for all landscaped areas.

**Response #7:**

*Vegetative buffer strips consistent with City Code and similar to other retail developments bordering the nature preserve have been proposed. As an additional buffer the Wal-Mart property will be surrounded by a pond planted with prairie grasses and wetland vegetation where the preserve abuts the property.*

Thank you in advance for the information and please call or email with any comments or questions.

Sincerely,  
CESO, Inc.



# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Pat Quinn, Governor  
Marc Miller, Director

September 10, 2012

Randee W. Timms, PE, Project Manager  
*CESO, Inc.*  
8534 Yankee Street, Suite 2B  
Dayton, Ohio 45458

RE: Wal-Mart Supercenter #1401-04  
IDNR Project #1300387

Dear Ms. Timms;

This letter is in reference to the project recently submitted through the EcoCAT (Ecological Compliance Assessment Tool) website. The project is construction of a Wal-mart Supercenter store, parking lot and associated utilities. The initial report generated for this project indicated the presence of protected resources in the vicinity of the project location.

The Department is in receipt of the response letter in which the applicant addresses the recommendations made by the Department as well as the exhibits of the detention basin adjacent to the site. The applicant has adequately addressed the three major concerns of the Department; hydrology, lighting, and litter. The Department is especially pleased with the lighting provisions selected for the site.

Consultation on the part of the Department is completed. This consultation is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

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Sincerely,

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Tracy Evans  
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(217) 782-7940

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Jenny Skufca, Illinois Nature Preserves Commission  
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Transportation, Engineering and Development, Naperville  
Christina Dudley, Cesco Inc  
JD Moon, Terracon