

**PROPOSAL FOR SECTION 404 PERMITTING &  
SECTION 401 WATER QUALITY CERTIFICATION  
AUTHORIZATION**

**ALDI Hinckley Distribution Center Expansion**

*Prepared for:*

**ALDI, Inc.  
6000 North Noah Drive  
Saxonburg, Pennsylvania 16056**

**Atwell, LLC Project No. 14000409**

**November 3, 2014**



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**TABLE OF CONTENTS**

<i>Section</i>	<i>Page</i>
<b>TABLES.....</b>	<b>II</b>
<b>APPENDICES .....</b>	<b>II</b>
<b>1.0 INTRODUCTION &amp; SITE HISTORY .....</b>	<b>1</b>
1.1 Project Purpose .....	2
1.2 Project Need.....	2
<b>2.0 SITE DESCRIPTION .....</b>	<b>2</b>
2.1 Location .....	2
2.2 Site Features.....	2
2.3 Hydrologic Conditions.....	3
<b>3.0 APPLICATION COORDINATIONS .....</b>	<b>4</b>
3.1 Federally Listed Rare and Endangered Species.....	4
3.2 State Listed Rare and Endangered Species.....	4
3.3 Archeological and Historical Records .....	5
<b>4.0 WETLAND DELINEATION.....</b>	<b>5</b>
4.1 Wetlands .....	6
4.2 Streams.....	7
<b>5.0 REQUIRED AUTHORIZATION.....</b>	<b>7</b>
<b>6.0 PROJECT ALTERNATIVES ANALYSIS - ARMY CORPS OF ENGINEERS .....</b>	<b>8</b>
6.1 Off-Site Alternative Analysis.....	8
<b>7.0 PROJECT ALTERNATIVE ANALYSIS – OHIO EPA: ANTI-DEGRADATION REVIEW .....</b>	<b>9</b>
7.1 Description of the Work (10a) .....	9
7.1.1 Preferred Design .....	9
7.1.2 Minimal Degradation Alternative .....	9
7.1.3 Non-Degradation Alternative (Not Feasible).....	10
7.2 Magnitude of the Lowering of the Water Quality (10b).....	10
7.2.1 Preferred Design .....	11
7.2.2 Minimal Degradation Alternative .....	11
7.2.3 Non-Degradation Alternative.....	11
7.3 Technical Feasibility and Cost Effectiveness (10c).....	11
7.3.1 Preferred Design .....	11
7.3.2 Minimal Degradation Alternative .....	12
7.3.3 Non-Degradation Alternative.....	12
7.4 Conservation Projects for Water Quality and Recreational Opportunities (10e).....	12
7.4.1 Preferred Design .....	12
7.4.2 Minimal Degradation Alternative .....	12
7.4.3 Non-Degradation Alternative.....	13
7.5 Water Pollution Control and Best Management Practices Costs (10f).....	13
7.5.1 Preferred Design .....	13

7.5.2	Minimal Degradation Alternative .....	13
7.5.3	Non-Degradation Alternative.....	14
7.6	Impacts to Human Health, Overall Quality, & Value of Water Resources (10g).....	14
7.6.1	Preferred Design .....	14
7.6.2	Minimal Degradation Alternative .....	14
7.6.3	Non-Degradation Alternative.....	14
7.7	Social and Economic Benefits to be Gained (10h) .....	14
7.7.1	Preferred Design .....	14
7.7.2	Minimal Degradation Alternative .....	14
7.7.3	Non-Degradation Alternative.....	14
7.8	Social and Economic Benefits to be Lost (10i).....	15
7.8.1	Preferred Design .....	15
7.8.2	Minimal Degradation Alternative .....	15
7.8.3	Non-Degradation Alternative.....	15
7.9	Environmental Benefits to be Gained and Lost (10j) .....	15
7.9.1	Preferred Design .....	15
7.9.2	Minimal Degradation Alternative .....	15
7.9.3	Non-Degradation Alternative.....	15
7.10	Proposed Mitigation Techniques (10k).....	15
7.10.1	Preferred Design .....	15
7.10.2	Minimal Degradation Alternative .....	16
<b>8.0</b>	<b>CONCLUSIONS.....</b>	<b>16</b>
<b>9.0</b>	<b>CITATIONS.....</b>	<b>17</b>

**TABLES**

Table 1.	County Soil Survey .....	3
Table 2.	Wetland Inventory Table .....	6
Table 3.	Watercourse Inventory Table.....	7
Table 4.	Impact and Avoidance Analysis.....	10
Table 5.	Project Cost Estimates per Alternative .....	12

**APPENDICES**

APPENDIX I:	Project Site Mapping
APPENDIX II:	Agency Correspondence and Cultural Resource Records Review (Atwell, LLC)
APPENDIX III:	Preliminary Jurisdictional Determination (PJD), Wetland Delineation Map, & Wetland Determination Data Forms
APPENDIX IV:	Photographic Log
APPENDIX V:	ORAM Forms & HHEI Forms
APPENDIX VI:	Hinckley Township Zoning Map
APPENDIX VII:	Preferred Design
APPENDIX VIII:	Minimal Degradation Alternative (Plan of Record)
APPENDIX IX:	Non-Degradation Alternative
APPENDIX X:	Project Support

## 1.0 INTRODUCTION & SITE HISTORY

ALDI, Inc. (Applicant) is proposing to construct the ALDI Hinckley Distribution Center Expansion Project (hereafter referred to as "Site"). The approximately 76-acre Site is located at the existing Hinckley Distribution Warehouse, 1319 West 130<sup>th</sup> Street, in Hinckley Township, Medina County, Ohio. The Site includes approximately 23.46 acres of forested area directly north, east, and southeast of the existing distribution warehouse. The Site is adjacent to undeveloped forested lands, residential developments, and industrial development.

The Applicant contracted Atwell, LLC (Atwell) to prepare a request for a Section 404 Authorization from the United States Army Corps of Engineers (USACE) Buffalo District, and a Section 401 Water Quality Certification (WQC) Authorization from the Ohio Environmental Protection Agency (OEPA) for impacts to Waters of the United States in association with the project. This document also contains an alternative analysis as required by the USACE for Section 404 Authorization and as required by the OEPA for Section 401 WQC.

The Applicant is proposing to construct an expansion to their cold storage distribution facility. The Preferred Design includes construction of a 129,980 square foot building, 232,750 square foot truck loading dock and parking expansion, 20-foot wide fire access road, and a 0.94-acre on-site stormwater detention basin. Clearing and grading of approximately 9.96 wooded acres including filling of approximately 5.40 acres of wetlands would be necessary to construct the facility and associated infrastructure under the Preferred Design. The Minimal Degradation Alternative, which is the plan of record (POR), includes construction of a 120,000 square foot building, 137,180 square foot truck loading dock and parking expansion, fire access road, and a 0.40-acre on-site stormwater detention basin. Clearing and grading of approximately 8.06 wooded acres including filling of approximately 4.35 acres of wetlands would be necessary to construct the Minimal Degradation Alternative.

On March 1 and 8, 2014 Atwell conducted a wetland delineation on behalf of the Applicant, which included the entire 76 acre parcel associated with the existing distribution warehouse (owned by the Applicant). Five (5) wetlands (Wetlands A – E) totaling approximately 15.10 acres and 3 streams totaling approximately 2,730 linear feet were identified on the Site. One perennial stream, an unnamed tributary to Plum Creek (Stream 1); one ephemeral stream (Stream 2); and one intermittent stream (Stream 3) were identified on the Site. A preliminary jurisdictional determination (PJD) site visit was completed by Ms. Susan Baker and Mr. Keith Sendziak of the USACE on June 11, 2014. At the time of the JD, one (1) additional wetland was identified (Wetland F) and adjustments to the boundaries of Wetland A occurred. In addition, a non-jurisdictional drainageway was identified between Wetland B and Stream 1, providing this wetland a jurisdictional connection. Therefore, a total of six (6) wetlands totaling 15.47 acres were identified on the Site. All identified wetlands and streams were determined to be jurisdictional and a PJD letter from the USACE was issued on July 8, 2014.

On July 31, 2014, Atwell met with Ed Wilk from the OEPA to confirm wetland categorization of identified wetlands on the Site. Wetlands to the north of the distribution center were categorized as higher quality forested types, while those to the east and south were categorized lower due to impacts from surrounding land use. Most wetlands on the site are within the Category 2 range and one wetland, Wetland F, was classified as a high-quality Category 3 wetland. The wetland impacts proposed for this project occur within lower-quality Category 2 wetlands. Higher-quality Category 2

wetlands are located within the northwestern portion of the Site, outside of the proposed expansion area.

### ***1.1 Project Purpose***

The purpose of the project is to construct an expansion of the existing ALDI Hinckley distribution warehouse to provide cold storage space to support an increased product line for the existing northeast Ohio ALDI retail grocery stores.

### ***1.2 Project Need***

The Applicant has seen tremendous growth over the last five years, with the addition of both retail stores and distribution centers across the country. The Hinckley facility is an important hub as it serves the northern Ohio market (63 stores). There has been an increased number of retail grocery products made available and demand for those product types over the last few years. As these retail locations attract a larger customer base, there are missed opportunities to provide an expanded range of product choices at a low cost. The following product groups will be developed further with the distribution center cold storage expansion:

- Produce
- Fresh meats including beef, chicken and pork
- Gluten free products, including baking items
- Organic line, including produce and fresh meat
- Yogurts, cheeses, and other dairy items

Anticipated sales growth is 30% over the next five years based on 2009-2013 sales. With this increase in sales, supporting facilities must be upgraded to accommodate the anticipated growth. Currently, the Hinckley facility is too small; it is the smallest ALDI distribution center in the United States. The Applicant plans to open additional stores and create approximately 350 jobs between the expanded distribution center and new retail stores within northern Ohio; therefore, they must upgrade their distribution facilities to support the demand.

## **2.0 SITE DESCRIPTION**

### ***2.1 Location***

The Site is located at 1319 West 130<sup>th</sup> Street in the town of Hinckley, Medina County, Ohio. Refer to the *Site Location Map* in **Appendix I**. The Site is adjacent to residential and industrial developments, and forested land.

### ***2.2 Site Features***

The developed portion of the Site consists of industrial buildings, concrete drives, asphalt parking, manicured lawn, and a linear stormwater drainage feature. The undeveloped portion of the Site to the north of the existing warehouse includes a large forested upland-wetland complex. The forested area is mid-successional, maple-oak-beech-hickory forest dotted with mature beech and hickory trees. The undeveloped portion of the Site to the east of the existing warehouse consists of lower quality scrub-shrub, emergent, and forested wetland. Residential development borders the Site to the west; industrial development borders it to the east; fallow field borders it to the south; and undeveloped forested area borders it to the north. Six (6) wetlands were identified on the Site including four (4) forested wetlands, one (1) scrub-shrub/emergent wetland, and one (1) emergent wetland. In addition,

three (3) streams were identified on the Site, including one (1) perennial stream, one (1) intermittent stream and one (1) ephemeral stream.

The U. S. Geological Survey (USGS) *Medina, Ohio Quadrangle Map* (dated 1994) indicates that the topography of the Site decreases slightly from the southwest to the northeast from an approximate elevation of 1190 feet to 1180 feet (National Geodetic Vertical Datum). Note that one stream, an unnamed tributary to Plum Creek, is mapped near the eastern boundary of the Site. No drainages, wetlands, or areas of open water are mapped for the Site. Refer to the *Site Location Map* in **Appendix I**.

According to the *Soil Survey for Medina County, Ohio* (USDA - NRCS, 2013) the Site contains four soil types: Condit silty clay loam (Cy), Mahoning silt loam with slopes of 0-2% (MgA), Mahoning silt loam with slopes of 2-6% (MgB), and Sebring silt loam, till substratum (St). Refer to **Appendix I** for the *County Soil Survey Map* and refer to **Table 1** below for a list of the soil types and their hydric ratings.

**Table 1. County Soil Survey**

Mapped Soil Unit	Hydric	Non-Hydric	Hydric Inclusions	Location of Hydric Inclusions
Condit silty clay loam (Cy)	Yes	No	Yes	Depressions
Mahoning silt loam, 0 to 2 percent slopes (MgA)	No	Yes	Yes	Drainageways Depressions
Mahoning silt loam, 2 to 6 percent slopes (MgB)	No	Yes	Yes	Drainageways Depressions
Sebring silt loam, till substratum (St)	Yes	No	Yes	Drainageways Depressions

**2.3 Hydrologic Conditions**

Soils within the Site are categorized as hydric or contain hydric inclusions according to the Natural Resource Conservation Service’s (NRCS) soil data for Medina County, Ohio. The soils on the Site are described as poorly drained or somewhat poorly drained. Hydric soils are conducive to the growth of hydrophytic (i.e., wetland) vegetation. Hydric soils tend to hold water for extended periods of time and may be frequently flooded or ponded as well (NRCS, 2014). Refer to the *County Soil Survey Map* in **Appendix I**.

A review of the National Wetland Inventory (NWI) Map was conducted to determine the likely presence, location, size, and type of wetlands that may be located on the subject property. The NWI map generated by the United States Fish and Wildlife Service (USFWS) shows one wetland area within the Site boundaries, as well as two additional wetland areas along the northern and eastern boundaries of the Site. Due to the age and methodology with which NWI data were produced, these data typically do not accurately portray the existence, type, and/or extent of wetlands. Refer to the *National Wetland Inventory Map* included in **Appendix I**.

The Federal Emergency Management Agency (FEMA)’s Flood Insurance Rate Map (FIRM) was reviewed for the Site (FEMA, 2013). The Site is mapped as Zone X, which indicates that the Site is not located within a FEMA-identified 100-year floodplain. Refer to the *FEMA FIRM Map* included in **Appendix I**.

### 3.0 APPLICATION COORDINATIONS

Coordination with the USFWS and the Ohio Department of Natural Resources (ODNR) regarding potential impacts to threatened and endangered species and protected natural areas, as well as coordination with the State Historic Preservation Office (SHPO) regarding cultural resources is required prior to authorization of any activity under Section 404 of the Clean Water Act. A review of relevant information available from the USFWS, ODNR, and SHPO for the vicinity of the Site was conducted prior to agency coordination. The results of this review as well as agency recommendations are described below.

#### 3.1 Federally Listed Rare and Endangered Species

The USFWS stated that the Site is not within the vicinity of any federal wilderness areas, wildlife refuges, or designated critical habitats. However, the Site is within the range of the Indiana bat (*Myotis sodalis*), a federally-listed endangered species. During winter, this species hibernates in caves and abandoned mines. The species' summer habitat includes dead or live trees and snags with peeling or exfoliating bark, split tree trunks and/or branches, and/or cavities. The Indiana bat often forages in stream corridors, riparian areas, and upland woodlots. The proposed project will result in forest clearing that includes potential roost trees. The USFWS recommends that any unavoidable tree removal should occur between October 1 and March 31. Considering this recommendation, the Applicant will not conduct tree removal activities between April 1 and September 30.

The USFWS also stated that the Site lies within the range of the northern long-eared bat (*Myotis septentrionalis*), a species that is proposed for listing as federally endangered. During winter, the species hibernates in caves and abandoned mines. The species' habitat includes dead or live trees and snags with peeling or exfoliating bark, split tree trunks and/or branches, or cavities. They may occasionally roost in structures like barns and sheds. The northern long-eared bat often forages in upland and lowland woodlots, and tree lined corridors. The proposed project will result in forest clearing that includes potential roost trees. The USFWS recommends that any unavoidable tree removal occur between October 1 and March 31 to avoid impacts to northern long-eared bats. Considering this recommendation, the Applicant will not remove trees between April 1 and September 30. Removal of barns and sheds is not proposed for this project.

Due to the project type, size, and location, the USFWS does not anticipate adverse impacts to any other federally endangered, threatened, proposed, or candidate species. Refer to the USFWS correspondence dated September 29, 2014 in **Appendix II**.

#### 3.2 State Listed Rare and Endangered Species

The ODNR indicated that the Site lies within the range of two state-listed species:

- Indiana bat (*Myotis sodalis*), state and federally endangered
- Black bear (*Ursus americanus*), state endangered

Based on the location, the type of habitat present at the Site and proposed activities, it is the ODNR's determination that the project is not likely to impact the black bear. The ODNR indicates that the Site is within the range of the Indiana bat and recommends that if suitable trees for this species (dead/dying trees with exfoliating bark and/or cavities) are present on the Site and must be removed, that tree clearing be conducted between October 1 and March 31. The Project will require tree

clearing, but it is very unlikely to result in significant impacts to the Indiana bat since tree removal will follow seasonal restrictions indicated by the ODNR. Considering this recommendation, the Applicant will not remove trees between April 1 and September 30. Refer to the ODNR correspondence dated October 6, 2014 which is included in **Appendix II**.

### ***3.3 Archeological and Historical Records***

Atwell produced a Cultural Resources Records Review in an effort to determine if historic properties or archaeological resources exist on or near the Site (within a one mile Area of Potential Effect [APE]). The cultural records review included a desktop review of available State Historic Preservation Office (SHPO) online-GIS records and cultural resource surveys, which indicated that archaeological sites or structures listed on the National Register of Historic Places (NRHP) are not located on Site. One archaeological site (33ME004) is documented within the APE, but structures listed on the NRHP are not documented within the APE. The archaeological site is located well away from the Site and would not be impacted by the proposed Project. Additionally, a cemetery is located within the APE, and would also not be directly or indirectly (visually) impacted by the proposed Project. According to the 1874 and 1897 historic atlases for Medina County, structures were not mapped within the Site, but were mapped within the APE. This review has determined that SHPO recorded cultural resources or standing structures will not be impacted by the proposed Project. This review indicated the lack of previous archaeological surveys within the Site which indicates the potential for archeological resources not previously identified by the SHPO to be present within the proposed Site boundary. However, due to the Site characteristics which indicate that the Site does not exhibit a high probability to contain prehistoric archaeological resources, Atwell does not recommend a Phase I cultural survey. The findings of this background research comply with Section 106 of the National Historic Preservation Act. A copy of the *Cultural Resources Record Review* and associated mapping is included in **Appendix II**.

### **4.0 WETLAND DELINEATION**

Atwell conducted a field investigation of the Site on March 1 and 8, 2014 to identify and delineate the location and extent of potential Waters of the United States, including streams and wetlands. The delineation identified five (5) wetlands on the Site (Wetlands A - E) totaling 15.10 acres. A PJD was completed for the Site by the USACE on June 11, 2014. The PJD identified one additional forested wetland, resulting in a total of six (6) on-site forested, scrub-shrub, and emergent wetlands totaling 15.47 acres. Refer to a copy of the *Preliminary Jurisdictional Determination*, the *Wetland Delineation Map*, and the *Wetland Delineation Data Forms* provided in **Appendix III**.

During the delineation, areas identified as potential Waters of the U.S. and areas that exhibited all three indicators of wetlands were noted. Identification of potential wetlands required characterization of plant community types, identification of hydric soils, and identification of hydrologic indicators for each community type.

For all potential wetland areas, dominant species in the tree, sapling, shrub, woody vine, and herb layers were determined for all potential jurisdictional areas, in accordance with the *Northcentral-Northeast Regional Supplement to the 1987 U.S. Army Corps of Engineers Wetland Delineation Manual*. Recorded vegetative data consisted of herbs with the greatest percentage of aerial cover within 5 feet of the plot center. Within a 30 foot radius of the plot center, saplings and shrubs with the greatest height, trees with the largest relative basal area, and woody vines with the greatest number of stems were recorded. Species within each of these layers were listed on data forms in order of dominance.

Soil data were collected using a 16-inch long shovel to a depth of approximately 24 inches to determine the presence of hydric soils. Soil matrix and mottle colors were identified using Munsell Soil Color Charts (Macbeth, Revised 2000). Evidence of any hydric soil characteristics and evidence of the presence of wetland hydrology were also recorded. The boundaries of areas in which all three wetland criteria were met were identified and measured in the field. Points at which dominant vegetation species changed from wetland to upland, where soils changed from hydric to non-hydric, or where indicators of wetland hydrology were no longer observed were noted. The characteristics of each community type were recorded on data forms and sample points were chosen to represent both an identified potential wetland and its surrounding upland community. Refer to the *Wetland Determination Data Forms* in **Appendix III** and the *Photographic Log* in **Appendix IV** for photos of these natural features.

#### **4.1 Wetlands**

Wetland A is approximately 12.01 acres in size and makes up a large portion of the northern section of the property. The wetland contains forested hydrophytic vegetation. This wetland is a depression area with standing water and water stained leaves. Soils were saturated at the surface, and presented a depleted matrix.

Wetland B is approximately 0.07 acres in size and is located in the northern portion of the property. The wetland contains emergent hydrophytic vegetation. This wetland is a sparsely vegetated concave surface with standing water. Soils were saturated at the surface and presented a depleted matrix.

Wetland C is approximately 0.73 acres in size and is located in the northeastern portion of the property. The wetland contains forested hydrophytic vegetation. This wetland is associated with an unnamed tributary to Plum Creek and Wetland A. Surface water was present. Soils were saturated at the surface and presented a depleted matrix.

Wetland D is approximately 0.43 acres in size and is located in the eastern portion of the property. The wetland contains forested hydrophytic vegetation. The hydrology of this wetland has been disrupted by surrounding development. Surface water was present. Soils were saturated at the surface and presented a depleted matrix.

Wetland E is approximately 1.86 acres in size and is located east and south of the existing ALDI warehouse. The wetland contains emergent and scrub-shrub hydrophytic vegetation of low quality. The hydrology of this wetland is affected by surrounding development and invasive species vegetation is present. Surface water was present. Soils were saturated at the surface and presented a depleted matrix.

Wetland F is approximately 0.37 acres in size and is located in the northern property boundary directly north of Wetland C. The wetland contains forested hydrophytic vegetation of high quality. This wetland is associated with an unnamed tributary to Plum Creek. Soils were saturated at the surface and presented a depleted matrix.

Refer to **Table 2** below, which summarizes the attributes of the wetlands identified on the Site. Refer to **Appendix V** for more details on the Ohio Rapid Assessment Method (ORAM) scoring forms for the on-site wetlands.

**Table 2. Wetland Inventory Table**

Description	Type	ORAM Score	Category	Size (Acres)	Jurisdictional Status*
Wetland A	PFO	57	Category 2	12.01	USACE
Wetland B	PEM	51	Category 2	0.07	USACE
Wetland C	PFO	57	Category 2	0.73	USACE
Wetland D	PFO	43	Category 2	0.43	USACE
Wetland E	PSS/PEM	35	Category 2	1.86	USACE
Wetland F	PFO	61	Category 3	0.37	USACE
<b>Wetland Totals</b>				<b>15.47 Acres</b>	

\*Applicant received a preliminary wetland determination from the USACE. Refer to the Preliminary Jurisdictional Determination (PJD) in **Appendix III**.

#### 4.2 Streams

Stream 1 is an unnamed tributary to Plum Creek, a perennial stream that flows along the eastern property boundary and continues off-site to the north. The channel is approximately 8 feet wide. The stream contains a riffle-pool sequence with pool depths of 8 inches in the reach evaluated. Predominant substrate types in this reach are cobble and gravel.

Stream 2 is an ephemeral stream flowing into Stream 1 from Wetland C in the northeast corner of the Site. This stream is approximately 4 feet wide and contains a substrate of primarily sand and leaf pack/woody debris.

Stream 3 is an intermittent stream that originates off-site to the northeast and flows into Stream 1. This stream is approximately 6 feet in width and contains a substrate of primarily silt and gravel.

Refer to **Table 3** below, which summarizes the attributes of the streams identified on the Site. Refer to **Appendix V** for more details on the Headwater Habitat Evaluation Indices (HHEI) scoring forms for the on-site streams.

**Table 3. Watercourse Inventory Table**

Description	Type	Length (linear feet)	HHEI Score*	Jurisdictional Status**
Stream 1	Perennial	2,200	71	USACE
Stream 2	Ephemeral	256	42	USACE
Stream 3	Intermittent	274	60	USACE
<b>Stream Totals</b>				<b>2,730</b>

\*Refer to Headwater Habitat Evaluation (HHEI) forms in **Appendix V**.

\*\*Applicant received a preliminary wetland determination from the USACE. Refer to the Preliminary Jurisdictional Determination (PJD) in **Appendix III**.

## 5.0 REQUIRED AUTHORIZATION

The proposed impacts to Waters of the United States include wetland fill in excess of 0.5 acres. The proposed project does not meet the criteria for a Nationwide permit; therefore, for activities associated with the proposed impacts, the proposed project will require an Individual Section 404 permit from the USACE and a Section 401 WQC from the Ohio EPA. An alternatives analysis is required for an Individual Section 404 permit and for a Section 401 WQC through the

antidegradation review. Due to the comprehensive nature of the requirements of the antidegradation review, a combined review is presented within *Sections 6.0 and 7.0* of this report and it is intended to provide information for the purposes of both Section 404 and Section 401.

## **6.0 PROJECT ALTERNATIVES ANALYSIS - ARMY CORPS OF ENGINEERS**

The applicant parcel located at 1319 West 130<sup>th</sup> Street, in Hinckley Township, Medina County, Ohio encompasses approximately 76 acres and includes the existing approximately 8.5-acre ALDI Hinckley Distribution Warehouse, as well as associated concrete drives, asphalt parking lots, truck dock loading areas, manicured lawn, and a concrete stormwater drainage feature. The applicant parcel is zoned as Office/Light Industrial (I-1). The applicant has seen significant growth in the past five years, with the addition of numerous retail stores as well as distribution centers throughout the United States. The Hinckley Distribution Warehouse serves as the main distribution center for the northern Ohio Market, which services approximately 63 retail locations. Anticipated sales growth is 30% over the next five years based on 2009-2013 sales. The existing warehouse is not large enough to support this increase in demand and associated production within the northern Ohio market. In order to meet the increased demand and provide refrigerated storage for increased quantities of products as well as new products such as gluten free and organic products, the applicant is proposing to expand its existing Hinckley facility. The proposed expansion is situated on the northern side of the existing facility and the POR includes construction of a 120,000 square foot building, 137,180 square foot trucking dock and parking expansion, 20-foot wide fire access road, and 0.40-acre on-site stormwater detention basin. Clearing and grading of approximately 8.06 wooded acres including filling of approximately 4.35 acres of wetlands is anticipated to facilitate the construction of the distribution center expansion and associated infrastructure.

### ***6.1 Off-Site Alternative Analysis***

The purpose of this project is to create increased refrigerated storage capacity to meet the growing demand within the northern Ohio market. The Hinckley Distribution Warehouse serves as the storage and distribution center for all of the ALDI retail stores within this region of Ohio. The Hinckley warehouse is an existing, approximately 8.5-acre distribution center with refrigerated and non-refrigerated storage, associated parking lots and truck dock loading areas, offices, stormwater drainage, and access drives. This distribution center is centrally located within northern Ohio, approximately 18 miles south of Cleveland.

As indicated in the 404(b) (1) guidelines, an alternative site is practicable if it is "...capable of being done after taking into consideration cost, existing technology, and logistics in light of overall project purposes." The following attributes have been considered in terms of locating alternative sites for the proposed project.

Zoning - The applicant owns the 76-acre parcel in which the existing distribution center is situated; this parcel provides the additional space that is needed for expansion of the facility, is currently zoned as office/light industrial (I-1), and is the only area with this zoning designation within Hinckley Township. Hinckley Township has a total of six (6) zoning designations. The majority of the township is zoned as residential (R-1 and R-2), general business (B-1), and Hinckley town center (B-2). Two other areas occur within Hinckley Township that would be zoned appropriately for this type of development; the zoning designation for these areas is Light Manufacturing/Industrial (I-2) and they are located in close proximity to the existing distribution center. Approximately 10 acres of clearing and grading are proposed for this project; however the project is dependent on the existing infrastructure of the Hinckley warehouse. The other two appropriately zoned parcels of land within

Hinckley Township contain existing development and any undeveloped areas are not large enough to accommodate the existing 8.5-acre warehouse, the proposed expansion area, and associated access drives, parking lots, and truck dock loading areas. Refer to the *Hinckley Township Zoning Map* in **Appendix VI** for a comparison of Hinckley Township zoning districts.

Existing Infrastructure - If the Applicant pursued purchasing another piece of property within an appropriate zoning district in Hinckley Township, the cost of purchasing the land and developing a brand new distribution facility that would be significantly larger than the existing warehouse substantially outweighs the cost of developing an expansion of the existing facility. The parcel associated with the existing facility is already owned by the Applicant and has 51 acres of undeveloped land, the majority of which is forested. The existing facility includes previously constructed access drives, parking lots, utilities, and office space that can be utilized for the expansion as well. A new facility in an undeveloped location would require costs associated with procuring the land; building/zoning permits and approvals; new infrastructure and utilities; as well as additional costs, agreements, and approvals associated with the development of a new warehouse.

Due to limited parcel availability and connectivity to existing utilities and infrastructure provided by the existing Hinckley facility, it is imperative that this proposed development remains on-site.

## **7.0 PROJECT ALTERNATIVE ANALYSIS – OHIO EPA: ANTI-DEGRADATION REVIEW**

An analysis of the Preferred Design, Minimal Degradation Alternative, and Non-Degradation Alternative is provided within Section 7.0 of this report. Each alternative includes a discussion of the expected magnitude of the lowering of water quality associated with each scenario. As required by the Anti-Degradation Rule, the anticipated impact of the proposed lowering of water quality on aquatic life, wildlife, and the overall aquatic community structure and function is included. In addition, mitigative techniques are also discussed.

The sequence of the alternative analysis discussion follows the format of the Application for OEPA Section 401 WQC and the numbers following the heading titles correspond with those indicated on the application form.

### ***7.1 Description of the Work (10a)***

#### ***7.1.1 Preferred Design***

The Preferred Design proposes to construct a 129,980 square foot expansion onto the existing ALDI's Hinckley warehouse building, a 232,750 square foot truck dock and parking area, a 0.94-acre stormwater basin, and a 20-foot wide fire access road around the new expansion. A total of 9.96 acres of forested area would be cleared to construct this project. As a result of this Preferred Design, approximately 5.33 acres of Wetland A and all of Wetland B would be completely graded and filled by construction activities totaling approximately 5.40 acres of permanent wetland fill. This design provides enough space for cold storage, plus additional truck parking. The Preferred Design has a total estimated cost of approximately \$28.9 million. The Preferred Design plan is included in **Appendix VII**.

#### ***7.1.2 Minimal Degradation Alternative***

The Minimal Degradation Alternative proposes to construct a 120,000 square foot expansion onto the existing ALDI's Hinckley warehouse building, a 137,180 square foot truck dock and parking area, a 0.40-acre stormwater basin, and a 20-foot wide fire access road around the new expansion. A total of 8.06 acres of forested area will be cleared to construct this project. As a result of this Minimal

Degradation Alternative, approximately 4.35 acres of Wetland A will be completely graded and filled by construction activities.

The Minimal Degradation Alternative has a total estimated cost of over \$24.8 million. This Alternative will increase material handling costs and provide less efficient operations compared to the Preferred Design, however, is still a technically feasible project. Despite the decreased cold storage and warehouse space and truck parking, the Minimal Degradation Alternative is the POR which the Applicant seeks to be permitted due to the reduction in impacts to wetlands and water quality. The *Minimal Degradation Alternative* is included in **Appendix VIII**.

### 7.1.3 Non-Degradation Alternative (Not Feasible)

The Non-Degradation Alternative is not a practicable or feasible design as it does not attain the project purpose. With the significant reduction in usable land, this alternative does not provide the needed expansion space for cold storage. Due to design layout restrictions (existing refrigeration section and loading dock location) alternative on-site locations are not an option. In order to have a project design resulting in avoidance of all potential Waters of the United States, the Developer would have to find another off-site warehouse space due to the location of wetlands and bordering streams within the Site boundaries. Based on an off-site analysis of site availability with suitable size and zoning options (as discussed above), no viable sites are available within Hinckley Township. Additional ALDI facilities within the area have already been expanded to capacity. The *Non-Degradation Alternative* is included in **Appendix IX**.

### 7.2 Magnitude of the Lowering of the Water Quality (10b)

Both the Preferred Design and the Minimal Degradation Alternative will result in filling and grading of on-site wetlands. However, the Minimal Degradation Alternative avoids impacts to 64% of the wetlands and 100% of the streams on the Site which will minimize permanent impacts to aquatic and terrestrial wildlife. Refer to **Section 3.2** for a list of threatened and endangered species that are in range of the Project and potential impacts to those species resulting from construction. Refer to **Table 4** for a summary of on-site wetland and watercourse features delineated and approved under a PJD and an avoidance analysis for each alternative.

**Table 4. Impact and Avoidance Analysis**

Resource	Classification	Acres/ Length	Assessment Score	Wetland Category	Preferred Design		Min-Deg Alternative	
					Impact	% Avoided	Impact	% Avoided
Wetland A	PFO	12.01 ac	57	Category 2	5.33 ac	56%	4.35 ac	64%
Wetland B	PEM	0.07 ac	51	Category 2	0.07 ac	0%	0.00	100%
Wetland C	PFO	0.73 ac	57	Category 2	0.00	100%	0.00	100%
Wetland D	PFO	0.43 ac	43	Category 2	0.00	100%	0.00	100%
Wetland E	PSS/PEM	1.86 ac	35	Category 2	0.00	100%	0.00	100%
Wetland F	PFO	0.37 ac	61	Category 3	0.00	100%	0.00	100%
Stream 1	Perennial	2,200 lf	71	n/a	0.00	100%	0.00	100%
Stream 2	Ephemeral	256 lf	42	n/a	0.00	100%	0.00	100%
Stream 3	Intermittent	274 lf	60	n/a	0.00	100%	0.00	100%
<b>Wetland Total</b>		<b>15.47 ac</b>			<b>5.40</b>	<b>65%</b>	<b>4.35 ac</b>	<b>72%</b>
<b>Stream Total</b>		<b>2,730 lf</b>			<b>0 ac</b>	<b>100%</b>	<b>0 ac</b>	<b>100%</b>
<b>Wetland Impact Total-Preferred Design</b>					<b>5.40 ac</b>			
<b>Wetland Impact Total-Minimal Degradation Alternative</b>							<b>4.35 ac</b>	

\*Refer to Headwater Habitat Evaluation (HHEI) forms in **Appendix III**.

\*\*Applicant received a preliminary wetland determination from the USACE. Refer to the Preliminary Jurisdictional Determination (PJD) in **Appendix III**.

### *7.2.1 Preferred Design*

The Preferred Design would result in the filling of 5.40 acres of wetlands. The proposed wetlands to be impacted have been categorized as forested and emergent type wetlands (Category 2). It is anticipated that implementation of the Preferred Design would slightly decrease quality of water on the Site as a result of the loss of 5.40 acres of Category 2 wetlands. However, the construction of a stormwater basin and preservation of higher quality aquatic or terrestrial resources that will be preserved in perpetuity on the Site, including 10.07 acres of Category 2 wetlands, 0.37 acre of Category 3 wetlands, 13.50 acres of upland forest, and 2,730 linear feet of stream, will protect degradation of water quality within the Plum Creek Watershed resulting from implementation of the Project.

This design would construct a stormwater detention basin that will meet the state, local, and federal regulations for water quality. This basin will be designed to catch and hold discharge from the Site. This water quality design will filter large pollutants from the water, preventing them from entering the downstream waters. The basin will undergo routine maintenance to ensure the viability and integrity; therefore, the project is not anticipated to significantly impact overall water quality or aquatic life and resources.

### *7.2.2 Minimal Degradation Alternative*

The Minimal Degradation Alternative will result in the filling of 4.35 acres of wetlands. Wetland impacts and impacts to wildlife utilizing these water resources will be reduced in the Minimal Degradation Alternative. Water quality degradation within the Plum Creek Watershed resulting from implementation of the Project would be less as the amount of impervious area, wetland impacts, and forested area impacts are lower than the Preferred Design. In addition, preservation of more aquatic and terrestrial features would occur under this alternative, a total of 11.12 acres of Category 2 wetlands, 0.37 acre of Category 3 wetlands, 15.64 acres of upland forest, and 2,730 linear feet of stream. A stormwater basin will be constructed that will meet the state, local, and federal regulations for water quality similar to the Preferred Design, further reducing potential water quality degradation within the Plum Creek Watershed as a result of this project.

### *7.2.3 Non-Degradation Alternative*

Impacts to wetlands and streams under the non-degradation alternative are completely avoided. In addition, no tree removal would take place in this alternative; therefore, impacts to water quality are not expected under the non-degradation alternative.

## **7.3 Technical Feasibility and Cost Effectiveness (10c)**

### *7.3.1 Preferred Design*

The Preferred Design has technical feasibility as it provides the amount of space that ALDI requires to support its current retail stores, along with ample loading dock space and truck parking. Implementation of this alternative would allow for total support of future ALDI stores directly out of this facility. The cost to construct this alternative would be more than the other two alternatives; however, it would be cost effective in the long term as it would support additional operations in future retail stores. Additionally, the cost for wetland/stream mitigation for this alternative would be greater than the Minimal Degradation Alternative. Refer to **Table 5** for a summary of a project cost comparison per alternative. The Non-degradation alternative is a non-build option and therefore it is not included in this comparison table.

**Table 5. Project Cost Estimates per Alternative**

Costs	Preferred Design Alternative	Minimal Degradation Alternative (\$)
Hard Costs	\$26.4 million	\$24.8 million
Soft Costs	\$2.5 million	\$1.8 million
Wetland/Stream Mitigation	\$243,750	\$206,070
<b>Total Development Cost</b>	<b>\$29.1 million</b>	<b>\$26.8 million</b>

*7.3.2 Minimal Degradation Alternative*

The minimization and avoidance of impacts to Waters of the United States makes the Minimal Degradation Alternative more favorable than the Preferred Design. Although this alternative reduces building area and truck parking, it still provides the minimal amount of building space and loading dock/truck parking to be a viable alternative. Although both the Preferred Design and the Minimal Degradation Alternative are technically feasible, the Minimal Degradation Alternative is more cost effective in terms of mitigation cost and a reduction of impacts to natural features.

*7.3.3 Non-Degradation Alternative*

The Non-Degradation Alternative is neither a technically feasible nor cost effective option. It would not provide additional cold storage or truck parking space. Based on the off-site alternative analysis previously discussed, there are no available sites within Hinckley Township that could be selected as an alternative site. The Non-Degradation Alternative design is a no-build option and is neither feasible nor practicable.

**7.4 Conservation Projects for Water Quality and Recreational Opportunities (10e)**

*7.4.1 Preferred Design*

In Brunswick Hills Township, Medina County, the Medina County Park District has converted a former landfill into Plum Creek Park, which is located along Plum Creek. The Western Reserve Land Conservancy (2012) has partnered with the Medina County Park District to preserve land in the Plum Creek Park region and holds conservation easements on two adjacent properties totaling 90 acres. The Preferred Design would slightly decrease water quality on the Site as a result of the loss of 5.40 acres of Category 2 wetlands. However, the Site is located approximately four (4) miles from Plum Creek Park and associated conservation easements. Additionally, the preferred Design includes construction of a stormwater detention basin that will meet the state, local, and federal regulations for water quality. This basin will be designed to catch and hold discharge from the Site. This water quality design will filter large pollutants from the water, preventing them from entering the downstream waters, and the basin will undergo routine maintenance to ensure viability and integrity. Therefore, the project is not anticipated to significantly impact water quality downstream or local conservation projects for water quality and recreation.

The ODNR and USFWS did not indicate in their correspondence that any other conservation projects are known for the local watershed.

*7.4.2 Minimal Degradation Alternative*

Conservation projects for water quality and recreational opportunities associated with the Minimal Degradation Alternative are the same as those discussed under the Preferred Design. However, the Minimal Degradation Alternative will include less impact on the water quality of the Site; the loss of 4.35 acres of wetland is associated with the Minimal Degradation Alternative. As mentioned above,

the Site is located approximately four (4) miles from Plum Creek Park and associated conservation easements. The Minimal Degradation Alternative also includes construction of a stormwater detention basin that will meet the state, local, and federal regulations for water quality. The project is not anticipated to significantly impact water quality downstream or local conservation projects for water quality and recreation.

The ODNR and USFWS did not indicate in their correspondence that any other conservation projects are known for the local watershed.

#### *7.4.3 Non-Degradation Alternative*

Conservation projects for water quality and recreational opportunities associated with the Non-Degradation Alternative are the same as those discussed under the Preferred Design. The Non-Degradation Alternative would not include any significant impacts to water quality or local conservation projects for water quality and recreation.

### **7.5 Water Pollution Control and Best Management Practices Costs (10f)**

An existing stormwater retention system is present in the eastern and southern portions of the site and manages the stormwater run-off generated from the existing ALDI distribution center and associated parking facilities. This stormwater system is not designed to be upgraded and therefore a separate stormwater basin will have to be constructed to ensure water quality from runoff associated with the expansion area.

#### *7.5.1 Preferred Design*

The construction of the Preferred Design would include the use of site-appropriate Best Management Practices (BMPs) to manage the stormwater runoff during construction activities. BMPs would be implemented during the construction of any of the alternatives. These may include, but are not limited to silt fencing, straw bales, erosion matting, and inlet protection. A stormwater pollution prevention plan will be designed and implemented under the State of Ohio's National Pollutant Discharge Elimination System (NPDES) program to minimize silt-laden runoff from the site during construction. The cost to design and implement a Stormwater Pollution Prevention Plan (SWPPP) for the Preferred Design is estimated at \$125,000.

Temporary sediment ponds will be constructed to control runoff during construction. All sediment controls that are utilized will be regularly inspected and maintained until the Site has been permanently stabilized. The establishment of a vegetative cover will decrease erosion potential and assist the sediment controls installed during construction.

A stormwater basin will be constructed that will meet state, local, and federal regulations for water quality. This basin will be located to the east of the expansion area and will be designed to catch and hold discharge from the new building and parking expansion area before release into Stream 1. The detention basin will undergo routine maintenance to ensure viability and integrity.

#### *7.5.2 Minimal Degradation Alternative*

The same BMPs proposed under the Preferred Design would be used during construction of the Minimal Degradation Alternative. The cost to design and implement a SWPPP for the Minimal Degradation Alternative would be less than the Preferred Design and is estimated at \$90,000. As described in the Preferred Design section above, one water quality basin will be installed on-site to manage stormwater runoff generated from the building and parking area expansion. Stormwater will be released from the basin into Stream 1.

### *7.5.3 Non-Degradation Alternative*

This is not considered a viable option as an alternative based on the configuration of wetlands and streams on the Site and the limitation of building siting. Therefore, the use of BMPs or the construction of stormwater facilities would not be necessary.

## ***7.6 Impacts to Human Health, Overall Quality, & Value of Water Resources (10g)***

### *7.6.1 Preferred Design*

No negative impacts to human health or the overall quality and value of the water resource will occur under the Preferred Design. Appropriate sized stormwater facilities will be constructed to manage runoff from the additional building and infrastructure. Runoff will be treated before it is released into Stream 1.

### *7.6.2 Minimal Degradation Alternative*

The Minimal Degradation Alternative is similar to the Preferred Design except for a reduction in the amount of impacts to waters of the United States will occur with the construction of a smaller building and infrastructure. Also, adequately sized stormwater facilities are proposed to manage runoff and maintain water quality post construction.

### *7.6.3 Non-Degradation Alternative*

This alternative would not have any impact to water resources as no expansion would be constructed.

## ***7.7 Social and Economic Benefits to be Gained (10h)***

### *7.7.1 Preferred Design*

This project, if constructed, will impact northern and central Ohio in a positive manner. Construction of this project would contribute substantially to the community and the local economy by increasing product availability (e.g., organic and gluten free products) at lower costs to serve its customer base. In addition, the expansion of the distribution center will help to bring the facility to an adequate size so it can support the projected 30% sales growth anticipated in the next 5-year period. This includes the addition of an estimated 50 jobs to the Hinckley facility and an estimated 300 jobs to the existing 63 store locations over the next 5 years. This distribution center would also provide support to future new retail store locations. This project is supported by local leaders and the increase in new tax revenue with implementation of this project is estimated to be an additional \$75,000. Refer to **Appendix X** for *Project Support* which detail the positive benefits this expansion project will have on the local economy.

### *7.7.2 Minimal Degradation Alternative*

The economic and community benefits provided under the Minimal Degradation Alternative would be similar to those expected under the Preferred Design. The size of the building and parking area presented in this alternative is the minimum size that could be constructed for this project to still be considered viable.

### *7.7.3 Non-Degradation Alternative*

A Non-Degradation Alternative on-site would not serve any social or economic benefit to the community as the Project would not technically be feasible to construct in order to avoid all natural features on-site and maintain financial gain.

## **7.8 Social and Economic Benefits to be Lost (10i)**

### *7.8.1 Preferred Design*

Implementation of this alternative will not result in the loss of important social and economic benefits, or impact commercial or recreational uses. The property is privately owned and it is neither accessible to the general public nor adjacent to recreational resources.

### *7.8.2 Minimal Degradation Alternative*

The Minimal Degradation Alternative is similar to that of the Preferred Design in that it will not result in the loss of social or economic benefits.

### *7.8.3 Non-Degradation Alternative*

The implementation of the Non-degradation Alternative is not a viable option; therefore, no social or economic benefits are anticipated to be lost.

## **7.9 Environmental Benefits to be Gained and Lost (10j)**

### *7.9.1 Preferred Design*

No adverse impacts to human health, water quality, or endangered and threatened species are anticipated as a result of implementation of any of these alternatives. Each of the three alternatives would be designed and constructed in accordance with federal, state, and local regulations that are meant to protect surface and ground water quality, human health, and the environment. The preservation of remaining upland forested buffer and forested, scrub-shrub, and emergent wetlands will provide long-term protection for natural features on an industrial-zoned site.

### *7.9.2 Minimal Degradation Alternative*

Environmental benefits provided under the Minimal Degradation Alternative are generally as stated under the Preferred Design. However, this design alternative will minimize impacts to natural features and Waters of the U.S., which is anticipated to be more beneficial to water quality than the Preferred Design.

### *7.9.3 Non-Degradation Alternative*

Environmental benefits under the Non-Degradation Alternative include no impacts to existing wetlands and streams on the site. However, this option is not viable or technically feasible due to the lack of off-site alternative site availability and cost feasibility and due to the limited design options for building siting within the Site.

## **7.10 Proposed Mitigation Techniques (10k)**

Mitigation on-site is impracticable due to limited area in which to potentially restore wetlands and potential damage to existing high quality upland areas that would occur in order to construct mitigation wetland areas. No mitigation banks exist with forested wetland credits in the Black-Rocky River watershed (HUC# 04110001). However, Edison Woods Wetland Mitigation Bank operated by the North Coast Regional Council of Park Districts (NCRCPD) has credits available for purchase and this mitigation bank serves the watershed in which the Project is located.

### *7.10.1 Preferred Design*

To compensate for unavoidable impacts to 5.40 acres of wetland on-site, the Applicant will provide mitigation in terms of wetland restoration and preservation of on-site wetlands and upland buffers.

As stated in OAC 3745-1-54, Section E, paragraph 5(b), preservation must occur at a rate of two acres of preservation for every remaining acre of the compensatory wetland mitigation requirement if

wetland restoration or creation is a component of the mitigation. In addition, OAC 3745-1-54, Section E, paragraph 6 states that non-wetland buffers may also be a component of acceptable compensatory mitigation.

The preservation of 13.50 acres of upland wooded buffers reduces the mitigation ratio from 2.5:1 to 2:1. The Applicant proposes to purchase 5.4 acres of credit from Edison Woods Wetland Mitigation Bank at a 1:1 ratio to satisfy the restoration mitigation component. In addition the Applicant proposes to preserve 10.07 acres of remaining on-site wetlands, 2,730 linear feet of streams, and 13.50 acres upland wooded buffer on the Site in a third-party conservation easement to satisfy the preservation component.

This will preserve water quality and wildlife habitat on an industrial Site, balancing economic growth and development with environmental stewardship.

#### *7.10.2 Minimal Degradation Alternative*

The Minimal Degradation Alternative is the POR and is what the Applicant expects to construct. To compensate for unavoidable impacts to 4.35 acres of wetland on-site, the Applicant will provide mitigation in terms of wetland restoration and preservation of on-site wetlands and upland buffers.

The preservation of 15.64 acres of upland wooded buffers reduces the mitigation ratio from 2.5:1 to 2:1. The Applicant proposes to purchase 4.4 acres of credit from Edison Woods Wetland Mitigation Bank at a 1:1 ratio to satisfy the restoration mitigation component. In addition, the Applicant proposes to preserve 11.12 acres of remaining on-site wetlands, 2,730 linear feet of streams, and 15.64 acres upland wooded buffer on the Site in a third-party conservation easement to satisfy the preservation component.

## **8.0 CONCLUSIONS**

The Applicant is proposing to construct the Hinckley Distribution Center Expansion to support its existing retail stores and to expand its product line. The Site contains a total of six (6) on-site forested, scrub-shrub, and emergent wetlands totaling 15.47 acres and three streams totaling 2,730 linear feet. A PJD was issued for the Site by the USACE on June 11, 2014 and it was determined that the streams and wetlands are likely regulated under the jurisdiction of the USACE.

The Minimal Degradation Alternative, which is the Plan of Record (POR) for the ALDI Hinckley Warehouse Expansion, would include a 120,000 square foot building expansion to their cold storage distribution facility, a 137,180 square foot trucking dock and parking expansion, a 20-foot wide fire access road, and a 0.40-acre on-site stormwater detention basin. Clearing and grading of approximately 8.06 wooded acres, including filling of approximately 4.35 acres of forested wetlands, would be necessary to construct the facility depicted in the Minimal Degradation Alternative. These impacts fall within the Black-Rocky River watershed (HUC# 04110001).

To compensate for unavoidable impacts to 4.35 acres of wetland on-site, the Applicant will purchase 4.4 acres of wetland mitigation credits at the Edison Woods Wetland Mitigation Bank operated by NCRCPD to meet the restoration mitigation ratio of 1:1 for forested wetland impacts. This mitigation bank site is considered an appropriate location for mitigation for wetland impacts within Black-Rocky River watershed. In addition, the Applicant will preserve a total of 11.12 acres of remaining Category 2 and Category 3 on-site wetlands, 15.64 acres of adjacent forested upland buffer, and 2,730 linear feet of stream in perpetuity through a third-party conservation easement as part of the implementation of this Project.

## 9.0 CITATIONS

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## **APPENDIX I**

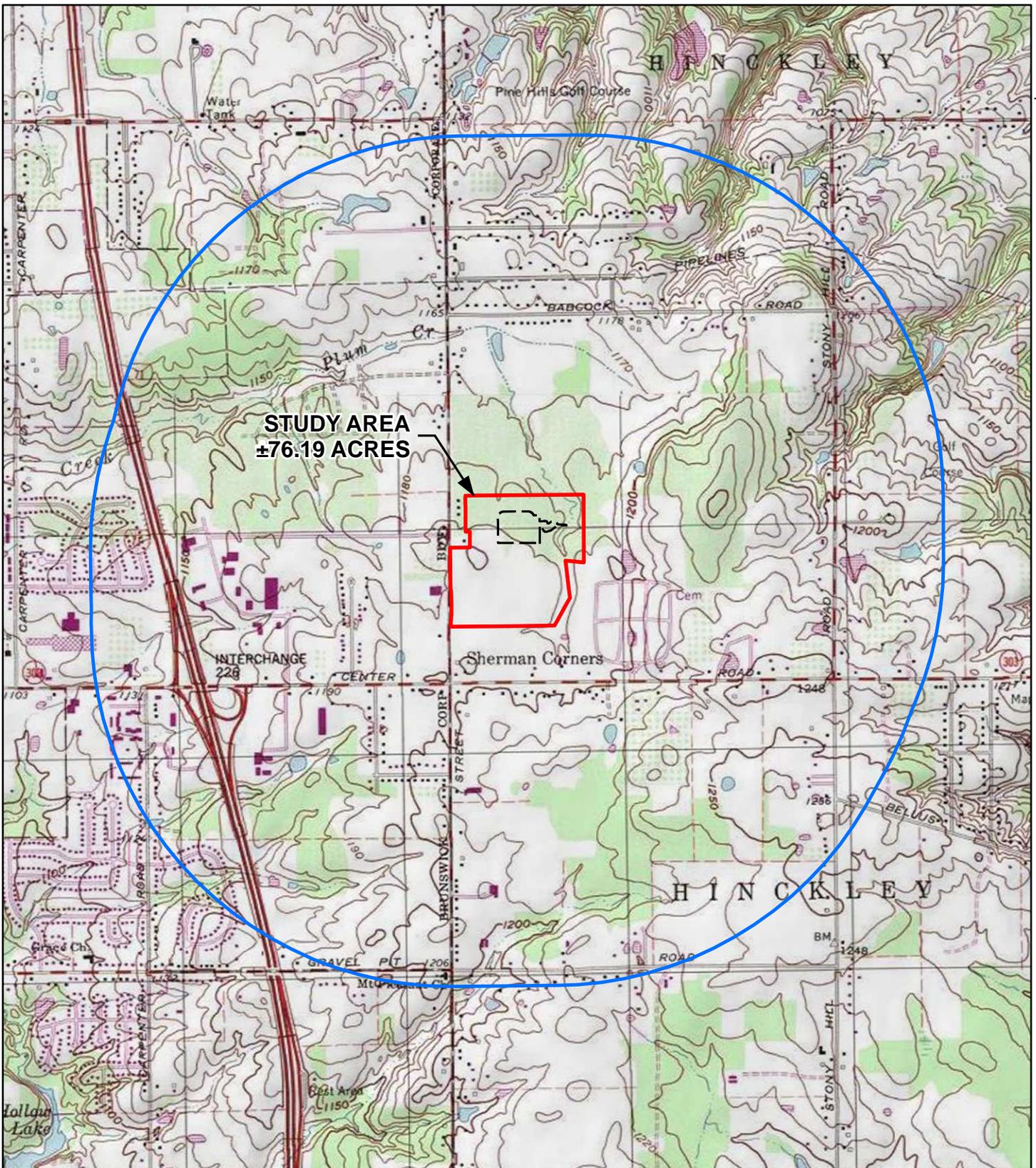
### **Project Site Mapping**

*Figure 1: Site Location Map*

*Figure 2: County Soil Survey*

*Figure 3: National Wetland Inventory Map*

*Figure 4: FEMA FIRM Map*



- ▭ STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- 1 MILE BUFFER

**FIGURE 1: SITE LOCATION MAP**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINCKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

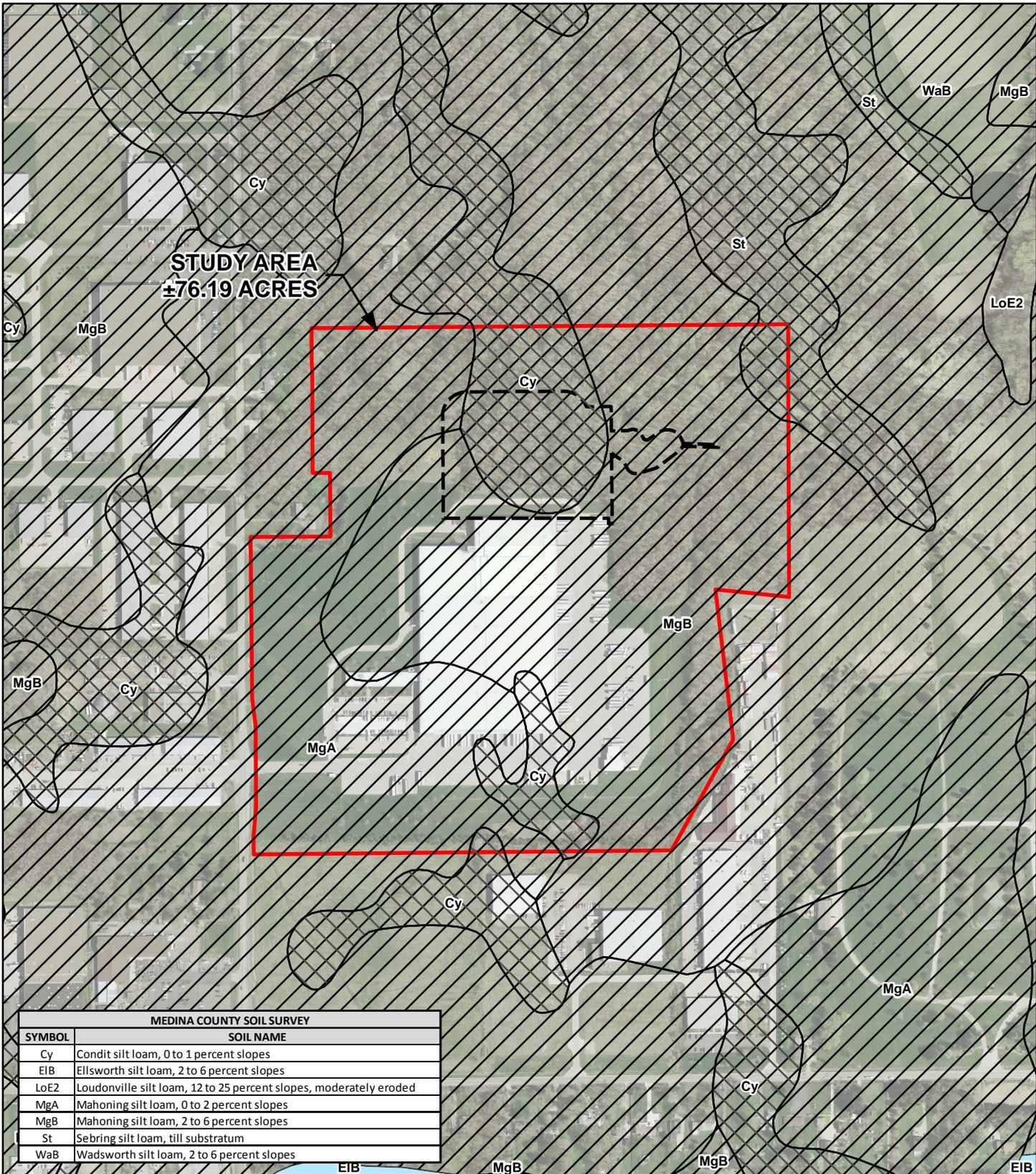
REFERENCE:  
 USGS 7.5 MIN TOPO QUAD  
 MEDINA, OHIO QUAD

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_01\_SITE

0 1,000 2,000  
 Feet  
 1" = 2,000 FEET



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**STUDY AREA  
±76.19 ACRES**

MEDINA COUNTY SOIL SURVEY	
SYMBOL	SOIL NAME
Cy	Condit silt loam, 0 to 1 percent slopes
EIB	Ellsworth silt loam, 2 to 6 percent slopes
LoE2	Loudonville silt loam, 12 to 25 percent slopes, moderately eroded
MgA	Mahoning silt loam, 0 to 2 percent slopes
MgB	Mahoning silt loam, 2 to 6 percent slopes
St	Sebring silt loam, till substratum
WaB	Wadsworth silt loam, 2 to 6 percent slopes

- STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- SOIL - POORLY DRAINED
- SOIL - SOMEWHAT POORLY DRAINED
- SOIL - WELL DRAINED



**FIGURE 2: SOIL SURVEY MAP**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINCKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

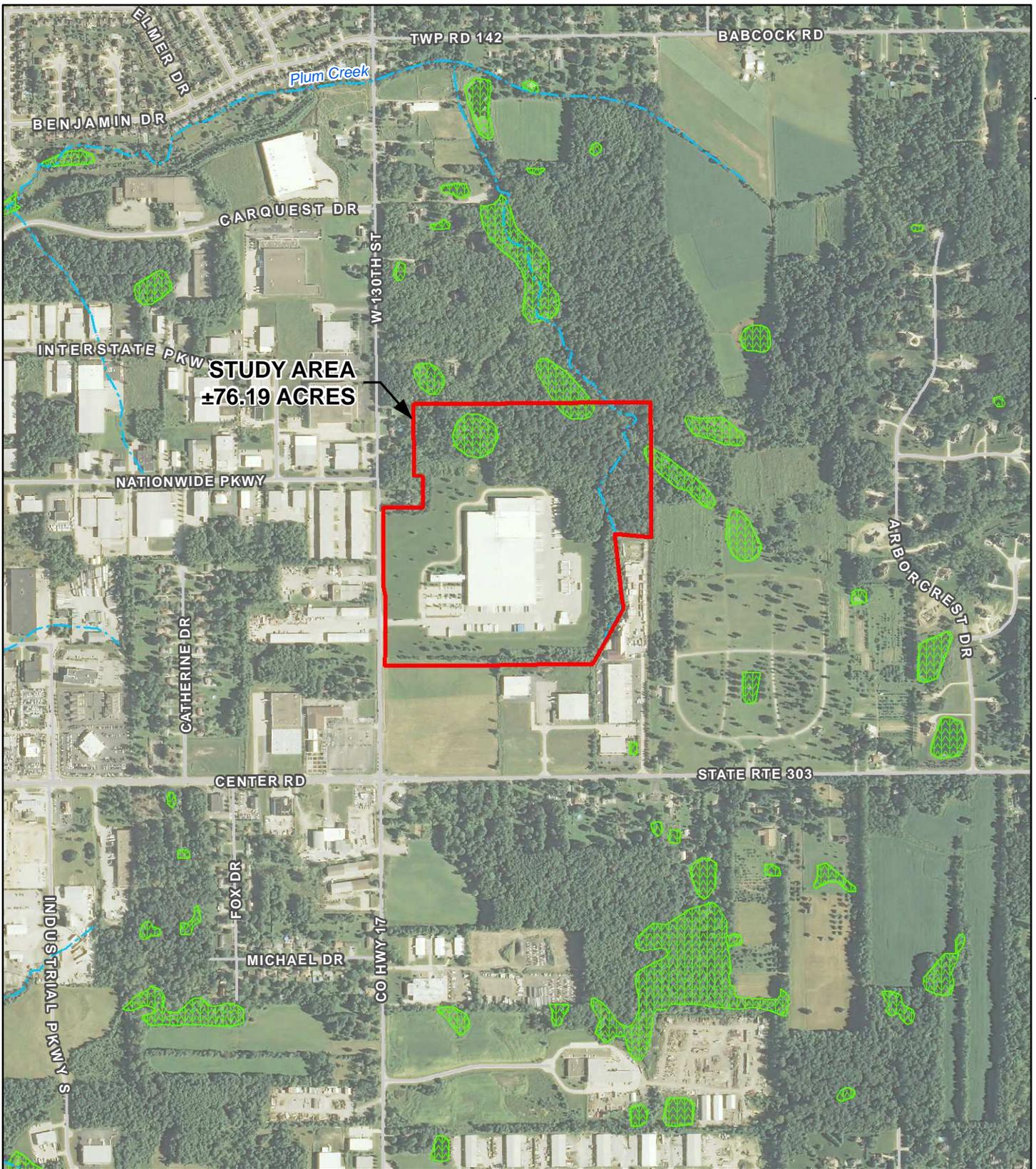
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 USGS 7.5 MIN TOPO QUAD  
 MEDINA, OHIO QUAD

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_02\_SOILS

0 250 500  
 Feet  
 1" = 500 FEET



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-  STUDY AREA
-  NATIONAL HYDROGRAPHY DATASET WATERCOURSE
-  NWI WETLANDS

**FIGURE 3: NATIONAL WETLAND INVENTORY MAP  
ALDI DISTRIBUTION CENTER EXPANSION PROJECT  
HINCKLEY TOWNSHIP  
MEDINA COUNTY, OHIO**

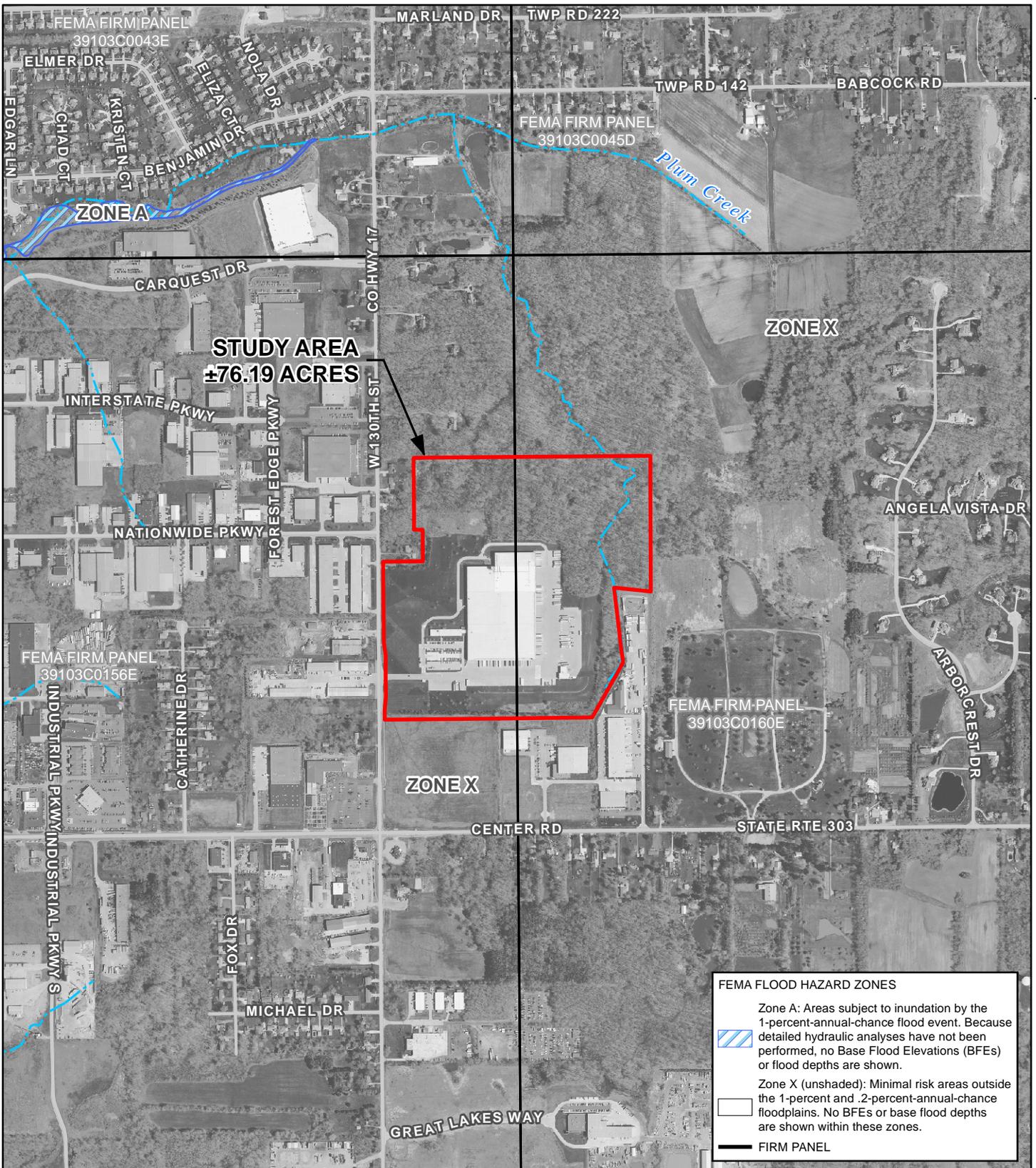


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Feet  
1" = 1,000 FEET

DATE: 10/7/2014  
DR: LWP  
GIS FILE: 14000409\_NWI



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STUDY AREA (±76.19 AC.)  
--- NHD WATERCOURSE

**FIGURE 4: FEMA FLOOD INSURANCE RATE MAP**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINCKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

**FEMA FLOOD HAZARD ZONES**

Zone A: Areas subject to inundation by the 1-percent-annual-chance flood event. Because detailed hydraulic analyses have not been performed, no Base Flood Elevations (BFEs) or flood depths are shown.

Zone X (unshaded): Minimal risk areas outside the 1-percent and .2-percent-annual-chance floodplains. No BFEs or base flood depths are shown within these zones.

FIRM PANEL

REFERENCE:  
 FEMA FIRM PANEL  
 39103C0156E & 39103C0160E  
 EFFECTIVE DATE:  
 8/19/2013

**PROJECT: 14000409**  
**DATE: 10/7/2014**  
 DR: LWP  
 GIS FILE: 14000409\_02\_SOILS

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 Feet  
**1" = 1,000 FEET**



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**APPENDIX II**

Agency Correspondence

*USFWS Response Letter*

*ODNR Response Letter*

*Cultural Resource Records Review Report (Atwell, LLC)*

## Jessica Miller

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**From:** susan\_zimmermann@fws.gov on behalf of Ohio, FW3 <ohio@fws.gov>  
**Sent:** Monday, September 29, 2014 2:03 PM  
**To:** Jessica Miller  
**Subject:** Aldi Distribution Center in Hinckley OH, Medina Co.

TAILS# 03E15000-2014-TA-1947

Dear Ms. Miller

We have received your recent correspondence requesting information about the subject proposal. There are no federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. The following comments and recommendations will assist you in fulfilling the requirements for consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA).

The Service recommends that proposed developments avoid and minimize water quality impacts and impacts to high quality fish and wildlife habitat (e.g., forests, streams, wetlands). Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. All disturbed areas should be mulched and revegetated with native plant species. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

**LISTED SPECIES COMMENTS:** All projects in the State of Ohio lie within the range of the Indiana bat (*Myotis sodalis*), a federally listed endangered species. Since first listed as endangered in 1967, their population has declined by nearly 60%. Several factors have contributed to the decline of the Indiana bat, including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, and the loss and degradation of forested habitat, particularly stands of large, mature trees. Fragmentation of forest habitat may also contribute to declines. During winter, Indiana bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) dead or live trees and snags with peeling or exfoliating bark, split tree trunk and/or branches, or cavities, which may be used as maternity roost areas;
- (2) live trees (such as shagbark hickory and oaks) which have exfoliating bark;
- (3) stream corridors, riparian areas, and upland woodlots which provide forage sites.

Should the proposed site contain trees or associated habitats exhibiting any of the characteristics listed above and/or the site contains any caves or abandoned mines, we recommend that the habitat and surrounding trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if surveys are warranted. Any survey should be designed and conducted in coordination with the Endangered Species Coordinator for this office. If no caves or abandoned mines are present and trees cannot be avoided, any unavoidable tree removal should only occur between October 1 and March 31. If implementation of the seasonal tree cutting restriction is not possible, summer surveys should be conducted to document the presence or likely absence of the Indiana bat within the project area during the summer. The survey must be conducted by an approved surveyor and be designed and conducted in coordination with the Endangered Species Coordinator for this office.

If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), no tree clearing on any portion of the parcel should occur until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend that the federal action agency submit a determination of effects to this office, relative to the Indiana bat, for our review and concurrence.

PROPOSED SPECIES COMMENTS: The proposed project lies within the range of the northern long-eared bat (*Myotis septentrionalis*), a species that is currently proposed for listing as federally endangered under the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq.). The final listing decision for the northern long-eared bat will occur no later than April 2, 2015. No critical habitat has been proposed at this time. Recently white-nose syndrome (WNS), a novel fungal pathogen, has caused serious declines in the northern long-eared bat population in the northeastern U.S. WNS has also been documented in Ohio, but the full extent of the impacts from WNS in Ohio is not yet known.

During winter, northern long-eared bats hibernate in caves and abandoned mines. Summer habitat requirements for the species are not well defined but the following are considered important:

- (1) Roosting habitat in dead or live trees and snags with cavities, peeling or exfoliating bark, split tree trunk and/or branches, which may be used as maternity roost areas;
- (2) Foraging habitat in upland and lowland woodlots and tree lined corridors;
- (3) Occasionally they may roost in structures like barns and sheds.

Pursuant to section 7(a)(4) of the ESA, federal action agencies are required to confer with the Service if their proposed action is likely to jeopardize the continued existence of the northern long-eared bat (50 CFR 402.10(a)). Federal action agencies may also voluntarily confer with the Service if the proposed action may affect a proposed species. Nevertheless, species proposed for listing are not afforded

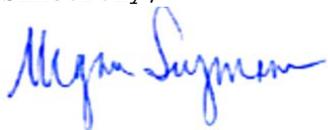
protection under the ESA; however as soon as a listing becomes effective, the prohibition against jeopardizing its continued existence and "take" applies regardless of an action's stage of completion. If the federal agency retains any discretionary involvement or control over on-the-ground actions that may affect the species after listing, section 7 applies. Therefore, should the proposed site contain trees or associated habitats exhibiting any of the characteristics listed above and/or the site contains any caves or abandoned mines, we are recommending that the habitat and surrounding trees be saved wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if surveys are warranted.

If no caves or abandoned mines are present and trees cannot be avoided, any unavoidable tree removal should only occur between October 1 and March 31 to avoid impacts to northern long-eared bats. Incorporating these conservation measures into your project at this time may avoid significant future project delays should the listing become official.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, proposed, or candidate species. Should the project design change, or during the term of this action, additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be initiated to assess any potential impacts.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act of 1973 (ESA), as amended, and are consistent with the intent of the National Environmental Policy Act of 1969 and the U. S. Fish and Wildlife Service's Mitigation Policy. This letter provides technical assistance only and does not serve as a completed section 7 consultation document. We recommend that the project be coordinated with the Ohio Division of Wildlife due to the potential for the project to affect state listed species. Contact Nathan Reardon, Environmental Review Coordinator with the Division of Wildlife, at (614) 265- 6741 or at [nathan.reardon@dnr.state.oh.us](mailto:nathan.reardon@dnr.state.oh.us).

Sincerely,



Megan Seymour  
Acting Field Supervisor

cc: Nathan Reardon, ODNR-DOW  
Jennifer Norris, ODNR-DOW



# Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

**Office of Real Estate**  
*Paul R. Baldrige, Chief*  
2045 Morse Road – Bldg. E-2  
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October 6, 2014

Jessica Miller  
Atwell Group, LLC.  
7100 E. Pleasant Valley Rd. Suite 220  
Independence, Ohio 44131

**Re:** 14-733; Aldi Distribution Center- Endangered Species Consultation -Aldi Expansion Project

**Project:** The purpose of this project is to construct an expansion of the cold storage portion of the Aldi Hinckley distribution warehouse.

**Location:** The project is located in Hinckley Township, Medina County, Ohio.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

**Natural Heritage Database:** A review of the Natural Heritage Database produced the following comments.

We are unaware of any animal assemblages, scenic rivers, state wildlife areas, state nature preserves, state or national parks, state or national forests or national wildlife refuges within the project area. The review was performed on the project area you specified in your request as well as an additional one mile radius. Records searched date from 1980.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

**Fish and Wildlife:** The Division of Wildlife (DOW) has the following comments.

The DOW recommends that impacts to wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: Shagbark hickory (*Carya ovata*), Shellbark hickory (*Carya laciniosa*), Bitternut hickory (*Carya cordiformis*), Black ash (*Fraxinus nigra*), Green ash (*Fraxinus pennsylvanica*), White ash (*Fraxinus americana*), Shingle oak (*Quercus imbricaria*), Northern red oak (*Quercus rubra*), Slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), Eastern cottonwood (*Populus deltoides*), Silver maple (*Acer saccharinum*), Sassafras (*Sassafras albidum*), Post oak (*Quercus stellata*), and White oak (*Quercus alba*). Indiana bat habitat consists of suitable trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. If suitable trees occur within the project area, the Division of Wildlife recommends that these trees be conserved. If suitable habitat occurs on the project area and trees must be cut, the Division of Wildlife recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the Division of Wildlife recommends a net survey be conducted between June 1 and August 15, prior to cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, the project is not likely to impact this species. The DOW appreciates Aldi Inc.'s commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

The project is within the range of the black bear (*Ursus americanus*), a state endangered species. Due to the mobility of this species, the project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the US Fish & Wildlife Service.

ODNR appreciates the opportunity to provide these comments. Please contact John Kessler at (614) 265-6621 if you have questions about these comments or need additional information.

John Kessler  
ODNR Office of Real Estate  
2045 Morse Road, Building E-2  
Columbus, Ohio 43229-6693  
John.Kessler@dnr.state.oh.us

**DUE DILIGENCE CULTURAL RESOURCES RECORD REVIEW**

*For the*

**ALDI HINCKLEY DISTRIBUTION CENTER EXPANSION**

**Medina County, Ohio**

*Prepared for:*

**Aldi, Inc.  
6000 North Noah Drive  
Saxonburg, Pennsylvania 16056**

**Atwell, LLC Project Number  
14000409**

**September 29 2014**



**ATWELL**

[www.atwell-group.com](http://www.atwell-group.com)  
866.850.4200

**TABLE OF CONTENTS**

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Section	Page
<b>1.0 PROJECT INTRODUCTION &amp; DESCRIPTION.....</b>	<b>1</b>
<b>2.0 RECORDS REVIEW RESOURCES.....</b>	<b>1</b>
<b>3.0 RECORDS REVIEW RESULTS.....</b>	<b>1</b>
3.1 National Register .....	1
3.2 Ohio Historic Inventory Resources.....	2
3.3 Ohio Archeological Inventory Resources .....	2
3.4 Ohio Genealogical Society Cemeteries.....	2
3.5 Previous Cultural Resources Surveys .....	2
3.6 Archeological Atlas of Ohio .....	2
3.7 Historic Atlases .....	3
3.8 Topographic Quadrangles .....	3
<b>4.0 CONCLUSIONS .....</b>	<b>4</b>
<b>REFERENCES.....</b>	<b>6</b>

**APPENDIX I**

- Figure 1. Site Location Map
- Figure 2. Soil Survey Map
- Figure 3. Ohio SHPO Online Mapping Inventory
- Figure 4. Mills Archaeological Map
- Figure 5. Historic 1874 Atlas
- Figure 6. Historic 1897 Atlas
- Figure 7. Historic Topographic Map

## **1.0 PROJECT INTRODUCTION & DESCRIPTION**

Atwell, LLC (Atwell) was contracted by Aldi, Inc. (Client) to perform a Due Diligence Cultural Resources Record Review for the Aldi Hinckley Distribution Center Expansion (Project). The Project is located at the Hinckley Distribution Warehouse, 1319 West 130<sup>th</sup> Street, in Medina County, Ohio, and consists of a proposed expansion of the existing cold storage distribution facility. The proposed expansion would include an approximately 5-acre Limit-of-Disturbance (LOD) which would be located within a larger approximately 76.2-acre parcel of land (Project Area). The Project Area appears on the Medina, Ohio U.S. Geological Survey (USGS) 7.5 minute quadrangle (USGS 1984; Figure 1).

The area under consideration for this records review (hereafter referred to as “Area of Potential Effect [APE]”), includes a one-mile-buffer surrounding the Project Area.

The Project Area consists of the existing Hinckley Distribution Warehouse with manicured lawns and previously undeveloped forested land located north of the warehouse. Additionally, approximately 15.47 acres of the 76.2-acre Project Area (approximately 20 percent) are wetlands. These wetlands are predominantly located within the forested land located north of the warehouse. Review of the Natural Resource Conservation Service (NRCS) Web Soil Survey (Soil Survey Staff 2014) indicated that the Project Area consists predominantly of Mahoning silt loam, 0 to 2 percent slopes and Mahoning silt loam, 2 to 6 percent slopes (Figure 2). Condit silt loam, 0 to 1 percent slopes and Sebring silt loam, till substratum soils are also present within the Project Area. The Mahoning silt loams which make up the Projects Area are considered somewhat poorly drained and Condit and Sebring silt loam soils are considered poorly drained. The Project LOD is predominantly composed of Condit silt loam soils.

## **2.0 RECORDS REVIEW RESOURCES**

The following resources were examined for the purposes of this record review: Ohio Historic Preservation Office (OHPO) online-GIS records which include National Register of Historic Places (NRHP) sites, NRHP Determination of Eligibility (DOE) properties, NRHP boundaries, the Ohio Historic Inventory (OHI), the Ohio Archaeological Inventory (OAI), Ohio Genealogical Society (OGS) cemeteries, and previous Phase I, II, and III cultural resources surveys (OHPO 2014). Additionally, the *Archaeological Atlas of Ohio* (Mills, 1914) was examined for recorded archaeological sites and Indian Trails. Historic county atlases (American Atlas Company 1897 and Evert 1874) and historic United States Geological Survey (USGS) topographic maps (USGS 1903a, 1903b, 1904a, 1904b, and 1984) were also reviewed.

## **3.0 RECORDS REVIEW RESULTS**

### ***3.1 National Register***

The records review of the OHPO online-GIS mapping revealed that NRHP listed historic properties, NRHP DOE, or NRHP boundaries are not listed within the Project Area or the APE (Figure 3). Therefore, NRHP listed historic properties, NRHP DOE, or NRHP boundaries would not be affected by the proposed Project.

### ***3.2 Ohio Historic Inventory Resources***

Review of OHPO online-GIS mapping (OHPO 2014) indicated that OHI resources are not located within the Project Area or the APE (Figure 3). Therefore, OHI resources documented on OHPO online-GIS mapping would not be affected by the proposed Project.

### ***3.3 Ohio Archeological Inventory Resources***

The records review of the OHPO online-GIS mapping (OHPO 2014) revealed that OAI resources are not located within the Project Area, but one OAI resource is located within the APE (Figure 3). The Benjamin Site (33ME004) is located approximately 2,800 feet northwest of the Project Area. The Benjamin Site is documented as a multi-component prehistoric site with Early Archaic, Late Archaic, and Early, Middle, and Late Woodland cultural manifestations. The type of archaeological site is unknown and the setting is an open site. Due to the distance of the Benjamin Site from the Project Area, direct and/or indirect impacts would not result to this archaeological site from development of the Project. Therefore, documented OAI resources would not be affected by the proposed Project.

### ***3.4 Ohio Genealogical Society Cemeteries***

The OGS records contained within OHPO online-GIS mapping (OHPO 2014) indicated that cemeteries are not located within the Project Area, but one cemetery is located within the APE (Figure 3). The Lutheran Memorial Cemetery is well established with defined boundaries and is located approximately 300 feet east of the Project Area. Due to the distance of the cemetery from the Project Area, direct impacts would not result from development of the Project. Additionally, existing vegetation, in the form of large trees, and industrial structures would screen the cemetery from any visual impacts that might occur from development of the proposed Project. Therefore, cemeteries documented on OGS records within the OHPO online-GIS mapping would not be affected by the proposed Project.

### ***3.5 Previous Cultural Resources Surveys***

Review of OHPO online-GIS records (OHPO 2014) indicated that previous cultural resources surveys have not been completed within the Project Area, but one has been completed within the APE (Figure 3). A Phase I Cultural Resources Investigation was completed for a proposed industrial park in the City of Brunswick (Shaffer 1998). Archaeological sites and other cultural resources were not identified as a result of this investigation. Therefore, cultural resources identified by previous cultural resources surveys would not be affected by the proposed Project.

### ***3.6 Archeological Atlas of Ohio***

A review of the Archaeological Atlas of Ohio (Mills, 1914) indicated that cultural resources were not recorded within the Project Area or the APE. Mills does document one mound in Hinckley Township, but this mound is located approximately 2.5 miles west of the Project Area west of the Town of Hinckley. Additionally, Mills documents three mounds and an enclosure in Medina County near the Town of Weymouth, approximately 3 miles south of the Project Area. These mounds and enclosure are located near major drainages, such as North Branch and the Rocky River East Branch.

Mills (1914) also documented Indian Trails within Ohio. The closest Indian Trail to the Project Area is Indian Trail Number 7 which is located approximately 3 miles south of the Project Area. Therefore, based on the distance of the Project Area from the cultural resources and Indian Trails documented by Mills (1914), impacts to these resources would not occur.

### ***3.7 Historic Atlases***

The 1874 historic atlas for Medina County (Everts 1874) was reviewed to determine if early historic structures were mapped within the Project Area or APE (Figure 5). In 1874, the Project Area was composed of portions of separate properties owned by J.M. Wait and M. Greenwood. A single structure was present on the J.M. Wait property and appears to be located within the Project Area. However, due to the scale and age of historic atlases it is difficult to determine the exact location of mapped features, and all locations represented on historic atlases should be considered approximate. Regardless, the structure on the J.M. Wait property would be located within the western portion of the Project Area, and would not be located within the Project LOD. Additionally, 33 structures were located within the APE in 1874. One of the mapped structures within the APE includes a school house on the Moses Sherman property from which the intersection of the modern Center Road and 130<sup>th</sup> street gets the name Sherman Corners. The Sherman school house was located approximately 900 feet southwest of the Project Area. Commercial buildings presently occupy the location of the Sherman school house.

Review of the 1897 atlas for Medina County (American Atlas Company 1897) indicated that J.M. Wait split his 100-acre parcel of land into two 50-acre parcels of land (Figure 6). Presumably, J.M. Wait did this as a means of gifting 50 acres of land to his son, A. Wait, who constructed a structure along the modern Center Road approximately 500 feet south of the Project Area. M. Greenwood also appears to have sold his property to an L. Chidsey. The original structure located on J.M. Wait's land present in the 1874 atlas (Everts 1874) is still present within the Project Area on the 1897 atlas (American Atlas Company 1897), and would not be located within the Project LOD. In addition to these two structures, 34 structures are present within the APE. One of these structures includes the Sherman school house which was mapped on the 1874 atlas and is documented in 1897 as school house number 9.

Many of the structures documented on the 1874 and 1897 atlases are no longer present within the APE and have been razed to make way for commercial and residential developments. Additionally, since the Project consists of the expansion of an existing commercial warehouse, visual impacts to the historically mapped structures are not expected to increase from what is already present due to the existing distribution warehouse.

### ***3.8 Topographic Quadrangles***

A historic 1904 USGS topographic map (USGS 1904b) was examined to determine the presence of structures within the Project Area (Figure 7). This map indicated that the structure which appeared to be present within the Project Area on the 1874 and 1897 county atlases (discussed in more detail in Section 3.7 above) is not located within the Project Area in 1904. It is likely that the structure was not actually present within the Project area on the 1874 and 1897 atlases because the scale of historic atlases makes it difficult to determine the exact location of features mapped on them. As previously noted, even if this structure is within the Project Area, it would

not be located within the Project LOD and as such would not be directly impacted by the proposed Project development.

Review of additional 1903 and 1904 USGS 15 minute quadrangle maps (USGS 1903a, 1903b, 1904a, and 1904b) indicates that 39 structures were present within the Project Area in 1903/1904 (Figure 1). Additionally, review of the 1984 USGS 7.5 minute quadrangle (USGS 1984) which was originally created in 1963 and photorevised in 1984 indicates that structures were not present within the Project Area in 1963/1984. However, numerous structures were mapped on the 1963/1984 topographic map within the APE, and predominantly consist of commercial and residential structures which make up the outskirts of the modern City of Brunswick, Ohio.

Due to the lack of mapped structures within the Project Area, direct impacts to structures mapped on USGS topographic maps would not occur. As previously discussed, visual impacts which might arise from Project development would be screened by surrounding vegetation (i.e. tall trees) and existing commercial/industrial/residential development. Therefore, structures documented on topographic maps (USGS 1903a, 1903b, 1904a, 1904b, and 1984) would not be affected by the proposed Project.

#### **4.0 CONCLUSIONS**

The records review of the OHPO online-GIS records indicates that NRHP listed historic properties, NRHP DOE, or NRHP boundaries (Section 3.1); OHI resources (Section 3.2), OAI resources (Section 3.3); Cemeteries (Section 3.4); and previous cultural resources surveys (Section 3.5) have not been previously identified within the Project Area. One OAI resource, one cemetery, and one previous cultural resources survey are recorded on OHPO online-GIS records within the Project APE. Additionally, historic atlas and topographic map review indicated that there is one structure which appears both inside (Figure 5 and 6) and outside (Figure 1 and 7) of the Project Area boundary on historic maps. It is likely that this structure is actually located just outside of the Project Area boundary because the scale of historic atlases (Figure 5 and 6) makes it difficult to determine the exact location of mapped structures and the structure is located outside the Project Area boundary on USGS topographic maps (Figure 1 and 7). Regardless, this structure would not be located within the Project LOD and would not be directly impacted by the proposed Project development.

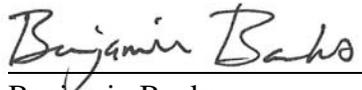
Historic maps also indicated the likelihood that historic structures were present within the Project APE in the past. Since the Project would consist of an expansion to the existing Hinckley Distribution Warehouse, indirect (visual) impacts to historic structures would not increase from the current impacts created by the existing warehouse. Additionally, vegetative cover (i.e. large trees) and other commercial/industrial structures would screen potential historic structures from visual impacts which may result from development of the Project.

Review of the Project Area indicated that the lack of documented archaeological resources within the Project Area may simply be a result of a lack of previous cultural resources survey, and should not be misconstrued to indicate that archaeological features are not present within the Project Area. Therefore, the Project Area was reviewed to determine if it exhibited

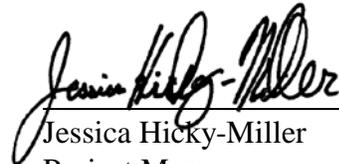
characteristics that would indicate a high probability of containing cultural resources. The lack of previous structures present on historic mapping indicates that significant historic archaeological sites would not likely be present within the Project Area. Additionally, as previously mentioned in Section 1.0, a large percentage of the Project Area consists of wetlands and is predominantly made up of soils which are classified as somewhat poorly drained. The rest of the soils within the Project Area are classified as poorly drained. The Project LOD is predominantly composed of Condit silt loam, which is classified as poorly drained. Typically, locations with a high probability to contain prehistoric archaeological sites are located on well drained soils. Additionally, the Project Area does not contain topographic features and is not located within close proximity to large drainages with stable floodplains which would indicate an increased propensity for prehistoric archaeological sites. Therefore, the Project Area is not considered to exhibit characteristics that would indicate a high probability of containing cultural resources. As such, Atwell does not recommend that a Phase I cultural resources survey of the Project LOD be conducted.

The findings of this background research comply with Section 106 of the National Historic Preservation Act.

Atwell, LLC



Benjamin Banks  
Archaeologist  
Natural Resources



Jessica Hicky-Miller  
Project Manager  
Natural Resources

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1904a *Berea, Ohio 15 Minute Topographic Quadrangle*. Reprinted 1948. United States Geological Survey; Reston, Virginia.

1904b *Medina, Ohio 15 Minute Topographic Quadrangle*. United States Geological Survey; Reston, Virginia.

1984 *Medina, Ohio 7.5 Minute Topographic Quadrangle*. Originally published in 1963 and Photorevised in 1984. United States Geological Survey; Reston, Virginia.

## **Appendix I**

Figure 1. Site Location Map

Figure 2. Soil Survey Map

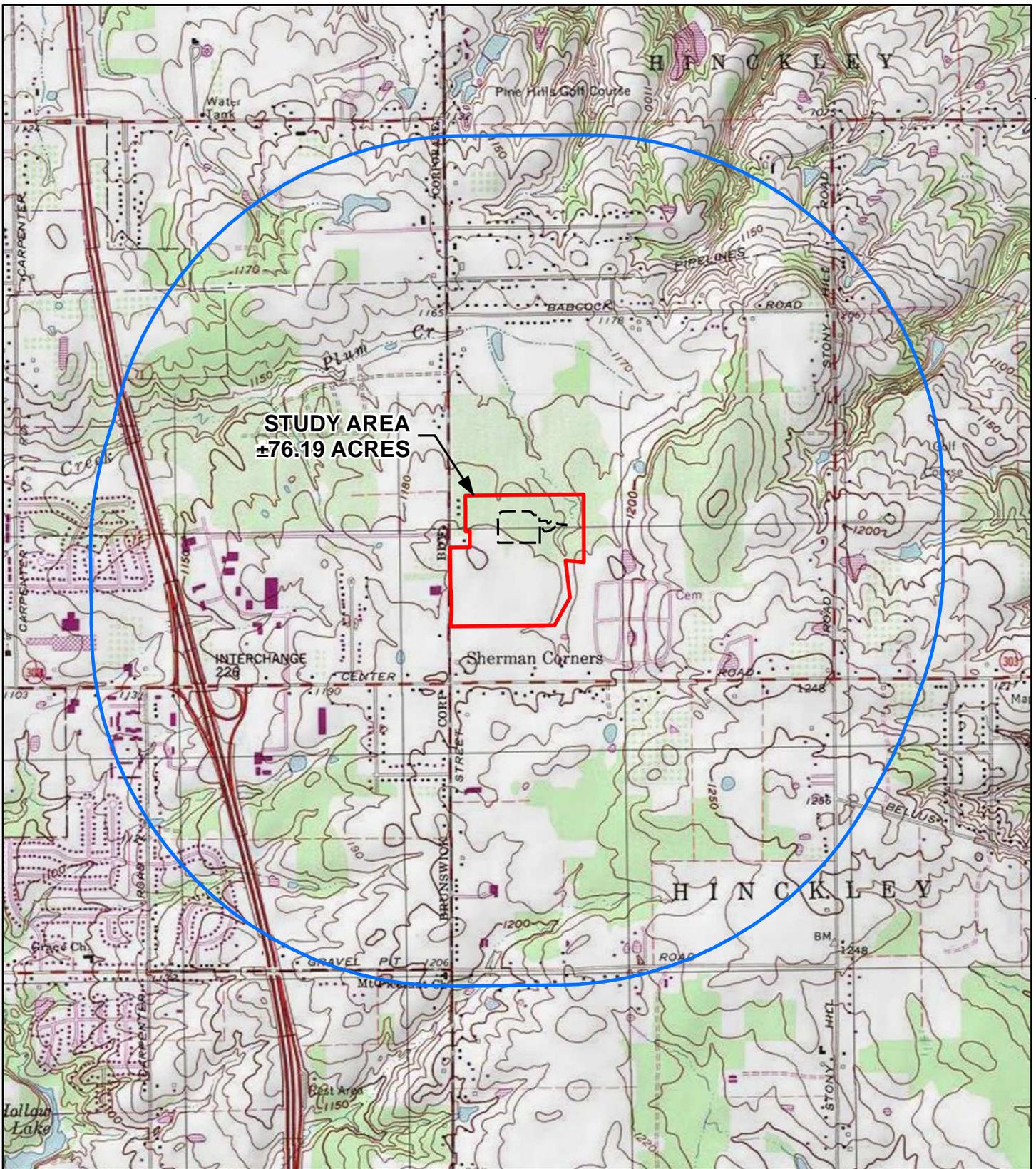
Figure 3. Ohio SHPO Online Mapping Inventory

Figure 4. Mills Archaeological Map

Figure 5. Historic 1874 Atlas

Figure 6. Historic 1897 Atlas

Figure 7. Historic Topographic Map



- ▭ STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- 1 MILE BUFFER

**FIGURE 1: SITE LOCATION MAP**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINCKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

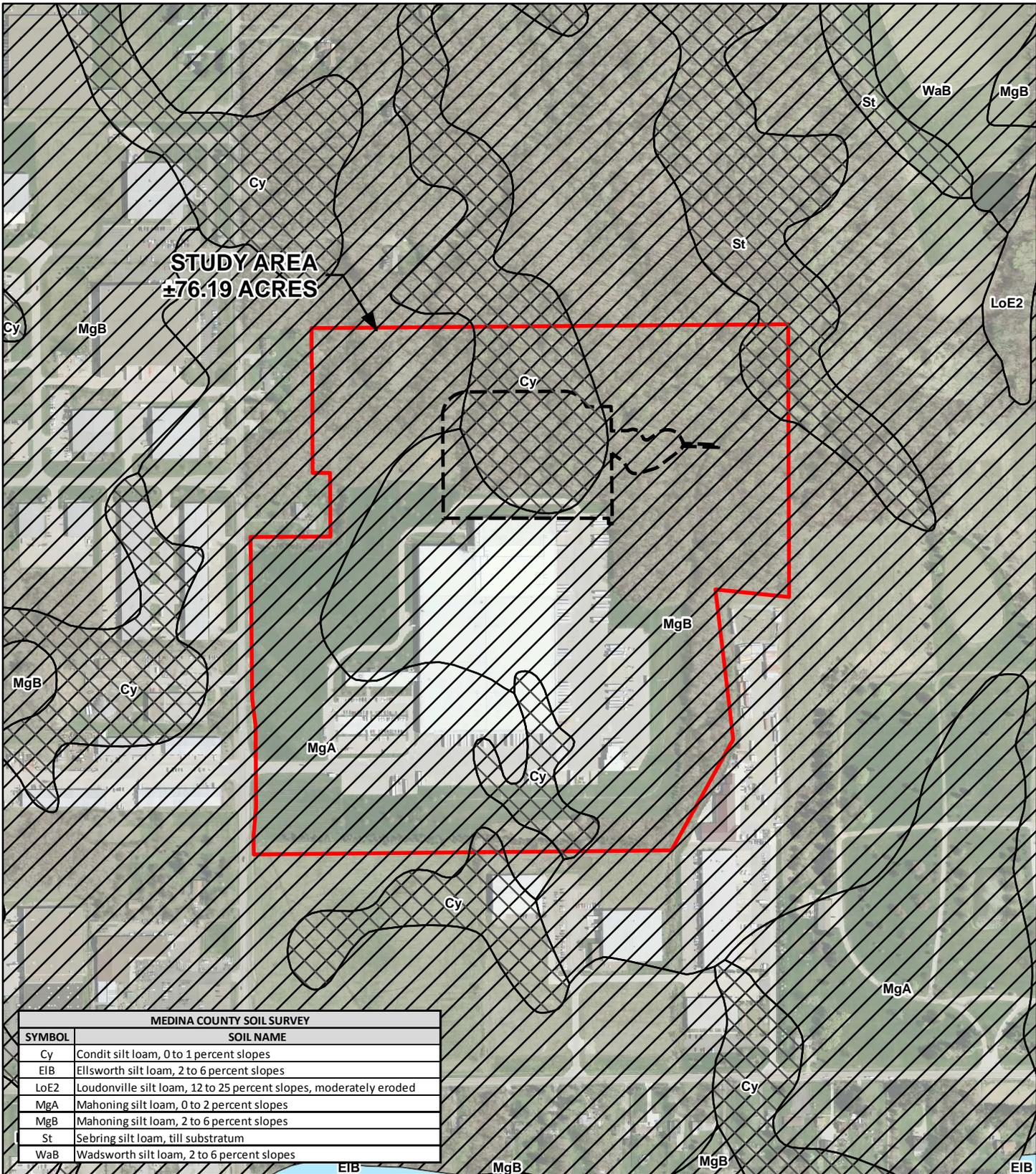
REFERENCE:  
 USGS 7.5 MIN TOPO QUAD  
 MEDINA, OHIO QUAD

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_01\_SITE

0 1,000 2,000  
 Feet  
 1" = 2,000 FEET



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**STUDY AREA  
±76.19 ACRES**

MEDINA COUNTY SOIL SURVEY	
SYMBOL	SOIL NAME
Cy	Condit silt loam, 0 to 1 percent slopes
EIB	Ellsworth silt loam, 2 to 6 percent slopes
LoE2	Loudonville silt loam, 12 to 25 percent slopes, moderately eroded
MgA	Mahoning silt loam, 0 to 2 percent slopes
MgB	Mahoning silt loam, 2 to 6 percent slopes
St	Sebring silt loam, till substratum
WaB	Wadsworth silt loam, 2 to 6 percent slopes

- STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- SOIL - POORLY DRAINED
- SOIL - SOMEWHAT POORLY DRAINED
- SOIL - WELL DRAINED



**FIGURE 2: SOIL SURVEY MAP**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINCKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

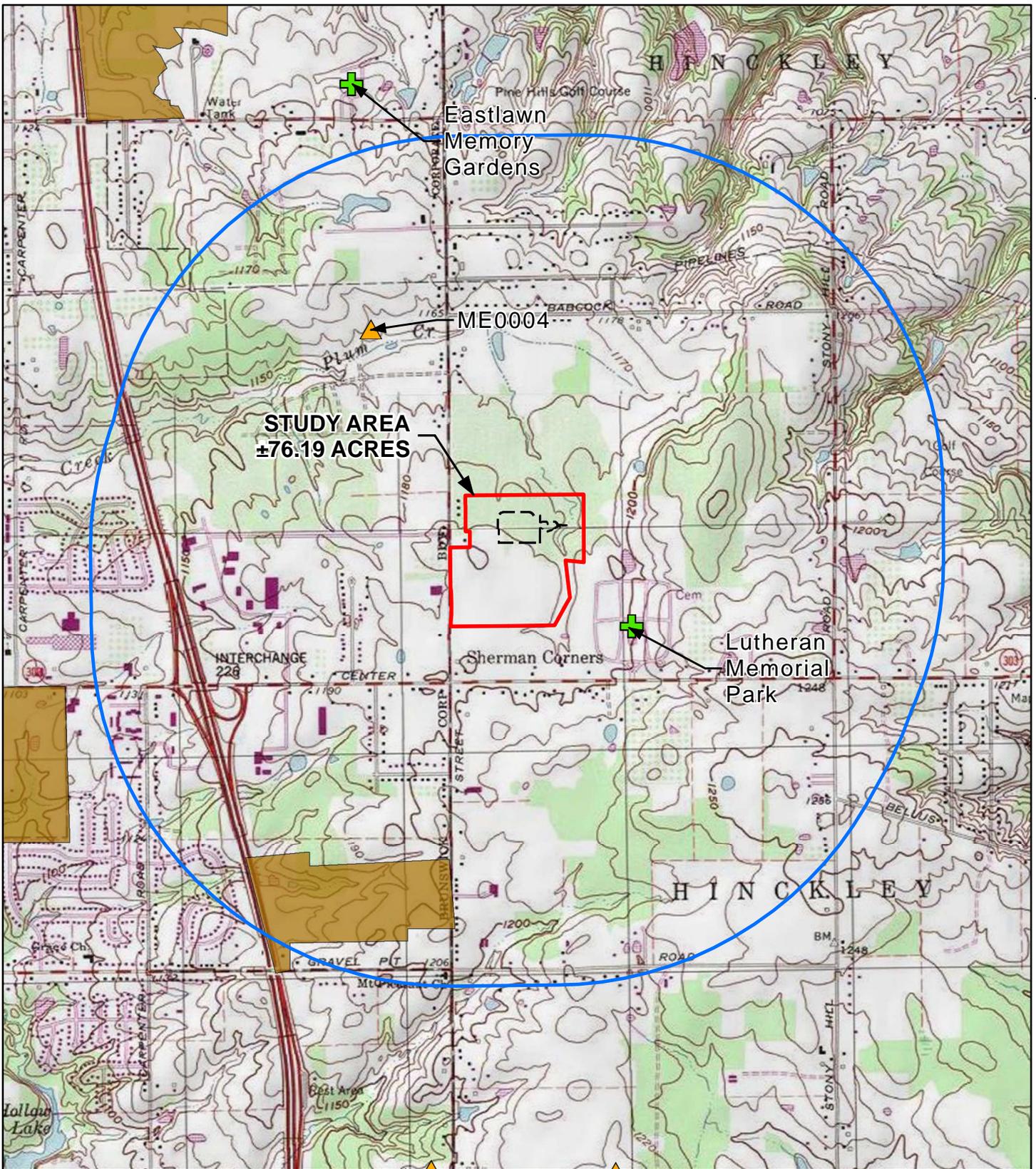
REFERENCE:  
 USGS 7.5 MIN TOPO QUAD  
 MEDINA, OHIO QUAD

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_02\_SOILS

0 250 500  
 Feet  
 1" = 500 FEET



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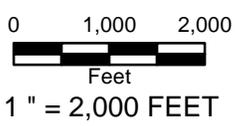


- STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- 1 MILE BUFFER
- PREVIOUS ARCHAEOLOGICAL SURVEY
- + OGS CEMETERY
- ▲ ARCHAEOLOGICAL SITE

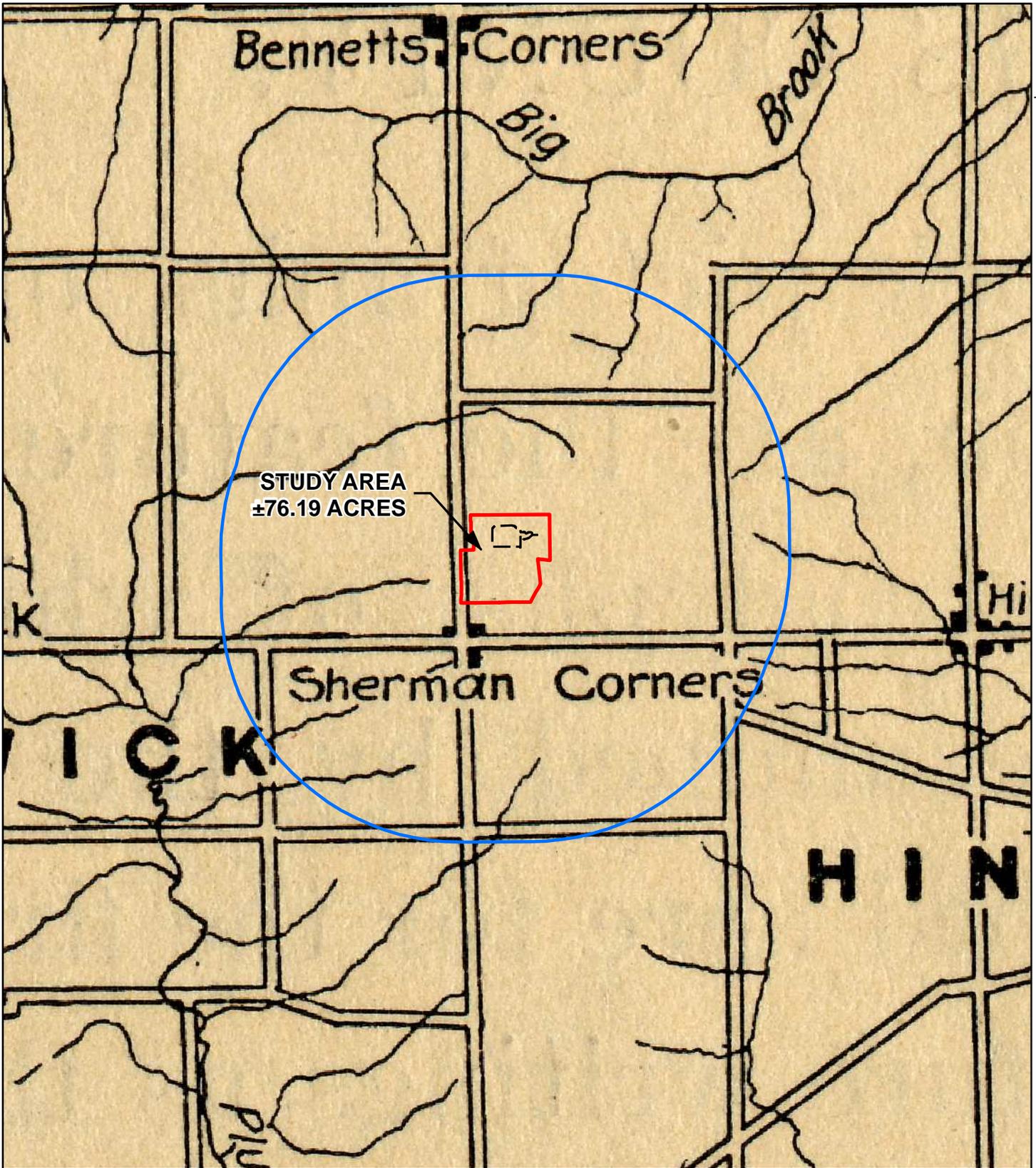
**FIGURE 3: OHIO SHPO ONLINE MAPPING INVENTORY  
ALDI DISTRIBUTION CENTER EXPANSION PROJECT  
HINCKLEY TOWNSHIP  
MEDINA COUNTY, OHIO**

REFERENCE:  
USGS 7.5 MIN TOPO QUAD  
MEDINA, OHIO QUAD

PROJECT: 14000409  
DATE: 9/27/2014  
DR: LWP  
GIS FILE: 14000409\_03\_SHPO



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-  STUDY AREA (±76.19 AC.)
-  PROPOSED LIMITS OF DISTURBANCE
-  1 MILE BUFFER

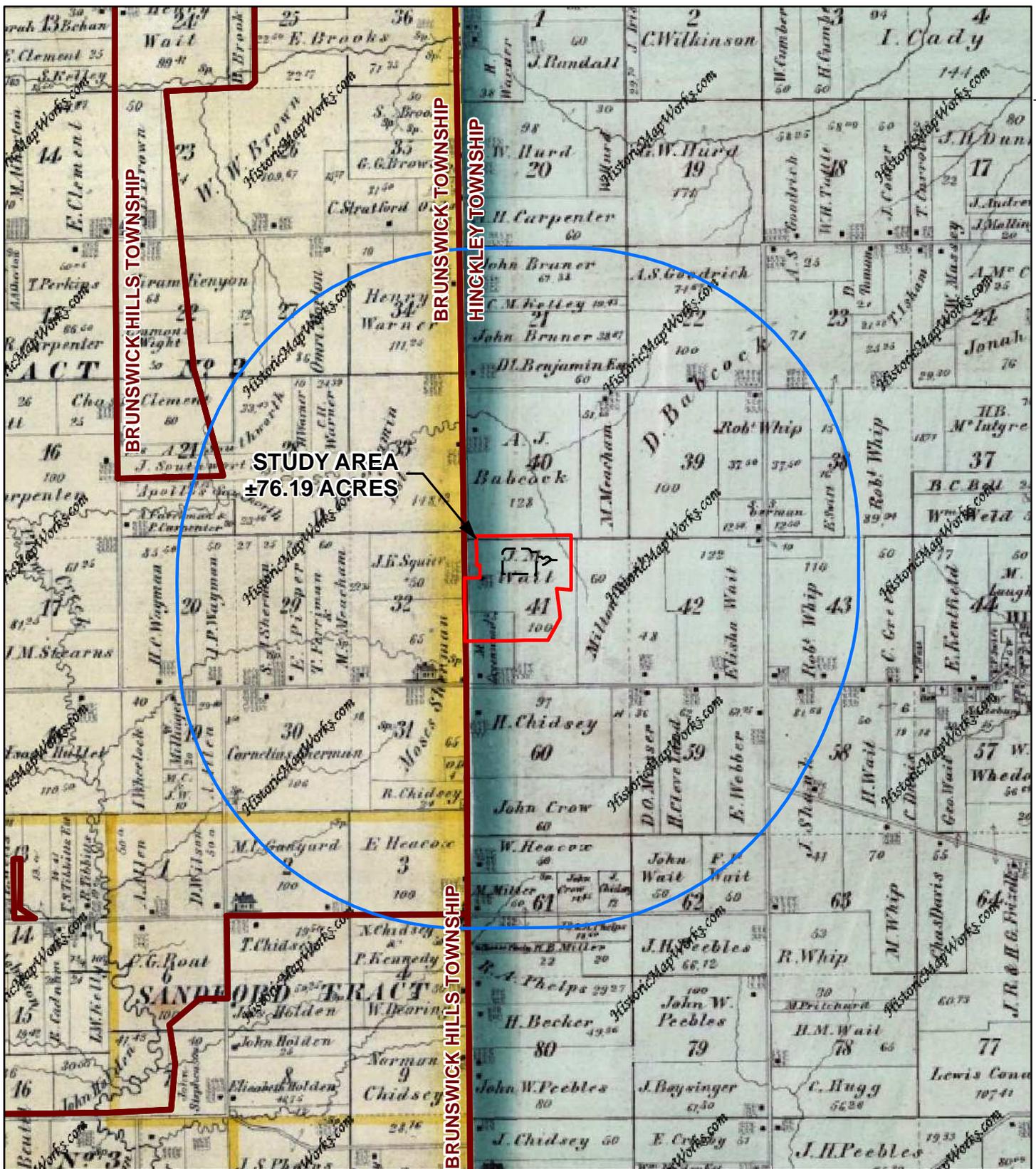
FIGURE 4: MILLS ARCHAEOLOGICAL MAP  
 ALDI DISTRIBUTION CENTER EXPANSION PROJECT  
 HINCKLEY TOWNSHIP  
 MEDINA COUNTY, OHIO

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_04\_MILLS

0 1,500 3,000  
 Feet  
 1" = 3,000 FEET




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- STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- 1 MILE BUFFER
- TOWNSHIPS

**FIGURE 5: HISTORIC 1874 ATLAS**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINGKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

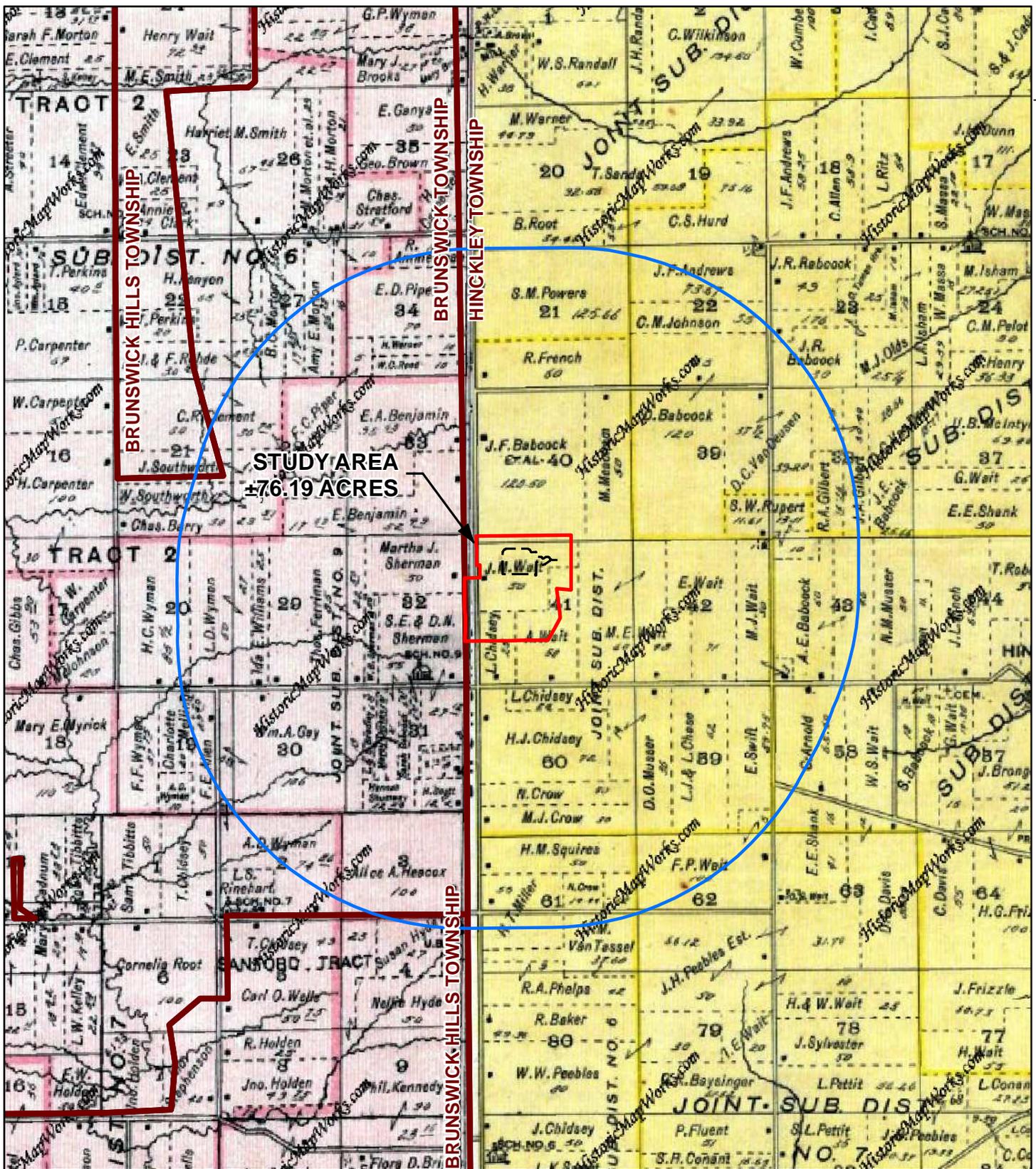
SOURCE  
 L.H. Everts 1874  
<http://www.historicmapworks.com/>  
 Accessed September 22, 2014

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_06\_1874ATLAS

0 1,250 2,500  
 Feet  
 1" = 2,500 FEET



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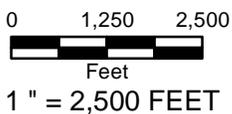


- STUDY AREA (±76.19 AC.)
- PROPOSED LIMITS OF DISTURBANCE
- 1 MILE BUFFER
- TOWNSHIPS

**FIGURE 6: HISTORIC 1897 ATLAS**  
**ALDI DISTRIBUTION CENTER EXPANSION PROJECT**  
**HINGCKLEY TOWNSHIP**  
**MEDINA COUNTY, OHIO**

SOURCE  
 THE AMERICAN ATLAS COMPANY 1897  
<http://www.historicmapworks.com/>  
 Accessed September 22, 2014

PROJECT: 14000409  
 DATE: 9/27/2014  
 DR: LWP  
 GIS FILE: 14000409\_06\_1897ATLAS



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**STUDY AREA  
±76.19 ACRES**

PROPOSED LIMITS OF DISTURBANCE

Sherman  
Corners

-  STUDY AREA (±76.19 AC.)
-  PROPOSED LIMITS OF DISTURBANCE
-  1 MILE BUFFER

**FIGURE 7: HISTORIC TOPOGRAPHIC MAP  
ALDI DISTRIBUTION CENTER EXPANSION PROJECT  
HINCKLEY TOWNSHIP  
MEDINA COUNTY, OHIO**

SOURCE  
USGS 1904 QAUD TOPO  
<http://www.usgs.gov/>  
Accessed September 22, 2014  
PROJECT: 14000409  
DATE: 9/27/2014  
DR: LWP  
GIS FILE: 14000409\_07\_HIST\_TOPO

0 1,250 2,500  
Feet  
1" = 2,500 FEET



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**APPENDIX III**

Preliminary Jurisdictional Determination (PJD), Wetland Location Map, & Wetland Delineation  
Data Forms



**DEPARTMENT OF THE ARMY**  
BUFFALO DISTRICT, CORPS OF ENGINEERS  
1776 NIAGARA STREET  
BUFFALO, NEW YORK 14207-3199

REPLY TO

July 8, 2014

Regulatory Branch

SUBJECT: Preliminary Jurisdictional Determination for Department of the Army Application  
No. 2014-00451

Mr. Brian McGee  
National Warehouse Coordinator  
ALDI Inc.  
6000 North Noah Drive  
Saxonburg, PA 16056

Mr. Daniel M. Crist  
A M King  
1610 East Morehead, Suite 200  
Charlotte, NC 28207

Dear Mr. McGee and Crist:

I have reviewed the wetland delineation map you submitted for an approximately 91.4-acre parcel located at 1319 West 130<sup>th</sup> Street in Hinckley Township, Medina County, Ohio.

I have evaluated your submitted wetland delineation map and have determined that the wetland and water boundaries shown on the map accurately represent on-site conditions. Please note that this is a Preliminary Jurisdictional Determination (JD). Preliminary JDs are non-binding written indications that there may be waters of the United States on your parcel and approximate locations of those waters. Preliminary JDs are advisory in nature and may not be appealed.

Pursuant to Regulatory Guidance Letter 08-02, any permit application made in reliance on this Preliminary JD will be evaluated as though all wetlands or waters on the site are regulated by the Corps. Further, all waters, including wetlands will be used for purposes of assessing the area of project related impacts and compensatory mitigation. If you require a definitive response regarding Department of the Army jurisdiction for any or all of the waters identified on the submitted drawings, you may request an approved jurisdictional determination from this office. If an approved jurisdictional determination is requested, please be aware that this is often a

Regulatory Branch

SUBJECT: Jurisdictional Determination for Department of the Army Application No. 2014-00451

lengthy process and we may require the submittal of additional information.

I have enclosed the Preliminary JD Form with this letter. The form and attached table identifies the extent of waters on the site and specific terms and conditions of the Preliminary JD. Please sign and return a copy of this form to my attention so that I may complete my evaluation of your file. If you do not respond within fifteen days of this letter, I will assume you no longer wish to pursue the jurisdictional determination and will withdraw your application.

In accordance with Regulatory Guidance Letter 05-02, "Preliminary jurisdictional determinations are not definitive determinations of areas within regulatory jurisdiction and do not have expirations dates." However, I strongly recommend that the boundaries of waters of the United States be re-evaluated by a qualified wetland biologist after five years of the date of this letter. This will ensure that any changes are appropriately identified and you do not inadvertently incur a violation of Federal law while constructing your project or working on your project site.

Lastly, this determination has been conducted only to identify the limits of waters that may be subject to Corps Clean Water Act or Rivers and Harbors Act jurisdiction. This delineation/determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985, as amended. If you or your tenant are USDA program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resource Conservation Service prior to starting work.

A copy of this letter has been sent to Ms. Rachel Taulbee (Ohio Environmental Protection Agency) and to M. Michael Koenig (Atwell, LLC).

Questions pertaining to this matter should be directed to me at (716) 879-4339, by writing to the following address: U.S. Army Corps of Engineers, 1776 Niagara Street, Buffalo, New York 14207, or by e-mail at: keith.c.sendziak@usace.army.mil

Sincerely,



Keith C. Sendziak  
Biologist

Enclosures

**ATTACHMENT**

**PRELIMINARY JURISDICTIONAL DETERMINATION FORM**

**BACKGROUND INFORMATION**

**A. REPORT COMPLETION DATE FOR PRELIMINARY JURISDICTIONAL DETERMINATION (JD): July 11, 2014**

**B. NAME AND ADDRESS OF PERSON REQUESTING PRELIMINARY JD:**

**Mr. Brian McGee  
National Warehouse Coordinator  
ALDI Inc.  
6000 North Noah Drive  
Saxonburg, PA 16056**

**Mr. Daniel M. Crist  
A M King  
1610 East Morehead, Suite 200  
Charlotte, NC 28207**

**C. DISTRICT OFFICE, FILE NAME, AND NUMBER: Buffalo District, Aldi Inc.  
Distribution Center, DA No. 2014-00451**

**D. PROJECT LOCATION(S) AND BACKGROUND INFORMATION:  
(USE THE ATTACHED TABLE TO DOCUMENT MULTIPLE WATERBODIES AT DIFFERENT SITES)**

State: Ohio County/parish/borough: Medina City:

Hinckley

Center coordinates of site (lat/long in degree decimal format):

Lat. 41.24475

Long. -81.78035

Universal Transverse Mercator:

Name of nearest waterbody: Plum Creek

Identify (estimate) amount of waters in the review area:

Non-wetland waters: 2,730

linear feet: 10 width (ft) and/or

acres.

Cowardin Class: Riverine

Stream Flow: Perennial

Wetlands: 15.47 acres.

Cowardin Class: Forested