



August 11, 2015

US Army Corps of Engineers, Buffalo District  
Regulatory Branch (Attn: Keith C. Sendziak)  
1776 Niagara Street  
Buffalo, NY 14207

**RE: Application No. 2014-01023, Section: OH, Applicant: IKEA Property Inc.**

On behalf of the local advisory committee for the Cuyahoga River Area of Concern [herein the AOC], I respectfully submit a letter in response to the Public Notice for the Application for a permit under the Authority of section 404 of the Clean Water Act (33 U.S.C. 1344) for IKEA Property Inc. The above mentioned application has requested a permit to permanently impact 15.5 acres of forested wetland on a 35.25 acre parcel within the Big Creek watershed located in the City of Brooklyn, Ohio. The forested wetland complex in question is one of the largest forested wetland complexes remaining in the Big Creek watershed, a sub-basin of the Cuyahoga River.

The AOC and its voting members support local, sustainable development and recognize IKEA's similar values. *"The IKEA vision is to create a better everyday life for the many people. This includes doing what we can to help create a world where we take better care of the environment, the earth's resources, and each other. We know this continuous improvement is a never-ending job, and that we are sometimes part of the problem. But we work hard to be part of the solution."* Reference [http://www.ikea.com/ms/en\\_GB/the\\_ikea\\_story/people\\_and\\_the\\_environment/](http://www.ikea.com/ms/en_GB/the_ikea_story/people_and_the_environment/).

Despite this common ground, **the AOC requests that the U.S. Army Corps of Engineers consider denying the permit for the following reasons:**

1. The development is located in an area that already exhibits significant flooding (see NEORS letter to the USACE in enclosed DVD). It is not possible for IKEA's proposed underground stormwater detention to provide the same level of environmental benefits as a forested wetland.
2. The proposed development contradicts guidance in State-endorsed plans. Specifically the Lower Cuyahoga River Total Maximum Daily Load (TMDL) report by Ohio EPA states, *"It is recommended that no new permits to impact Category 2 and 3 wetlands be issued in the Lower Cuyahoga River TMDL area. All permits issued for impacts to Category 1 wetlands should ensure that mitigation is conducted on site if possible and at a minimum within the watershed area. If mitigation cannot be conducted on site or within the watershed area, then a permit should not be issued for the proposed project."* (pg.88, See Lower Cuyahoga TMDL in enclosed DVD). Page 37 of the TMDL also states that; *"In addition to the above sources, urbanization and suburbanization also contribute to non-attainment. Discharges from storm sewer systems also carry oxygen demanding substances, nutrients, and bacteria."* This

statement reinforces our concerns with added development and loss of wetlands in the AOC.

**3. Big Creek Balanced Growth Plan**

Big Creek Connects, the local watershed organization, developed a State-endorsed "Balanced Growth Plan" (See plan on enclosed DVD). The Plan took a balanced look at Priority Development Areas (PDA) in the Big Creek watershed and as well as Priority Conservation Areas (PCA). The report explains why the AOC is recommending avoiding permanently impacting the forested wetland in this application.

A) Page 40 of the plan shows that if the site is developed, the City of Brooklyn will lose half of its PCA area set aside in their commercially-zoned district. This could have significant flooding effects downstream and also cause a significant loss to the biological integrity of this area.

B) Page 15 of the plan shows that the sub-watershed in the proposed area has a 47% impervious cover already. Thus by permanently impacting the wetlands in question, the development will likely significantly increase stormwater run-off and decrease water quality in that area.

C) Page 36 shows the proposed IKEA site as being a PCA in the Big Creek watershed.

D) Page 20 is a survey of residents and elected officials showing that 95% of those surveyed wanted to see stream and wetland features restored and protected and another 88% of those surveyed thought that hazardous flooding was of great concern in the Big Creek Watershed.

**4. The Great Lakes Water Quality Act established the Great Lakes Areas of Concern.**

Supporting state and local organizations were given the charge to clean-up and delist these areas. Paving one of the largest remaining wetland complexes in the Big Creek watershed will prevent this sub-basin from ever meeting its delisting goals in the future (See delisting targets for Big Creek watershed pg. 80 of the Cuyahoga AOC Stage 2 Report on the enclosed DVD).

**5. Lastly, this development contradicts IKEA's own policies as mentioned above. The AOC is not against development, but rather we are working towards helping our community leaders understand that the environmental services provided by these natural wetlands and riparian corridors cannot be replaced or effectively reconstructed. To be more sustainable in our development we urge the City of Brooklyn and IKEA to consider an alternative redevelopment location rather than destroying one of the last 15+ac.-forested wetland complexes in the Big Creek watershed. The Balanced Growth Plan designated over 1,900 acres for commercial redevelopment, some of which lies within the City of Brooklyn. Surely an acceptable alternative exists.**

**Mitigation Suggestions**

As previously noted, the State-endorsed plans that have been developed for the Big Creek watershed and Lower Cuyahoga River, state that mitigation to permanently impacted wetlands and streams should take place within the watershed. The Big Creek Balanced Growth Plan on page 150, summarizes wetland mitigation sites and provides cost estimates for completing the mitigation. Please note that the cost estimates were from 2003. Over \$1.8 million worth of projects in the Big

Creek Balanced Growth Plan are available. On page 143 of the same plan is also a summary of wetland mitigation sites in the Cuyahoga AOC worth over \$17.5 million dollars. For a more detailed analysis of the potential mitigation sites in the AOC please review the *PRIORITIZING WETLAND RESTORATION POTENTIAL IN THE TRIBUTARIES OF THE CUYAHOGA RIVER AREA OF CONCERN (AOC) 2008*, which can be found on the enclosed DVD.

Despite highlighting documents that provide a multitude of mitigation options, **the AOC's preference is that USACE deny application no. 2014-01023 and work with IKEA to identify a redevelopment opportunity within the City of Brooklyn** that produces less environmental harm and helps the AOC meet its federal obligations of delisting the Cuyahoga River Area of Concern.

Lastly, we request a public hearing to allow our stakeholders the opportunity to express their thoughts on IKEA's proposal. Please contact me if you have additional questions.

Sincerely,



Jennifer Grieser

Chair, Cuyahoga River Area of Concern Advisory Committee

Cc: Ed Wilk, AOC Coordinator, Ohio EPA Lake Erie Program