



**Forest Preserve District
of DuPage County**

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Sent via email: Planning@naperville.il.us

December 14, 2020

Bruce Hanson, Chairman
Naperville Planning and Zoning Commission
City of Naperville
400 S. Eagle Street
Naperville, IL 60540

Re: Public Hearing - PZC Case #20-1-086 - Pulte Home Company, LLC
1960-2000 Lucent Lane, Nokia campus
PINs: 05-32-300-014, 08-05-207-036
Underlying PINs: 05-32-300-012 (pt.) and 08-05-207-034 (pt.)

Dear Mr. Hanson,

The Forest Preserve District recently received a Notice of Public Hearing regarding Pulte Home Company's petition for approval of: Major Change to PUD; PUD Plat for development of Naper Commons; and Conditional Use to permit single-family attached dwelling units in the R2 Zoning along with several setback and encroachment deviations (variances). We appreciate receiving timely notification of such requests that may have an impact on Forest Preserve District property, and thank you for the opportunity to comment.

Staff has reviewed the information provided to the Forest Preserve District and have the following comments:

The Forest Preserve District is concerned about stormwater runoff from the subject property, which is surrounded by Danada Forest Preserve to the north and east and Herrick Lake Forest Preserve to west. Both Preserves include ecosystems rated as Class III and IV (the Forest Preserve District's highest ratings). These Preserves include wetlands where many bird species, including Great Blue Herons, are known to nest. In fact, there is a Great Blue Heron rookery with many nests about 300 feet from the Nokia property line. Though stormwater basins are routinely incorporated into design plans, they have the potential to damage ecosystems when heavy rain events send invasive plants (seeds), fertilizers, pesticides, salt, and chemical runoff from pavement into the neighboring wetlands.

The use of plant species that are non-native to the Chicago Region have a direct negative impact to natural areas, and are considered both exotic and invasive. The use of hybrids and cultivars is strongly discouraged and the Forest Preserve District requests that only native species known to the Chicago Region be used for all landscaping plants.

Numerous studies have documented that light pollution and artificial light at night has negative and deadly effects on amphibians, birds, mammals, insects and plants. Newer installations of street lights in nearby communities have adopted recommendations as set forth by the International Dark Sky Association and Dark Sky Society. We ask the Planning and Zoning Commission to heed these recommendations and require full cutoff shields on street lights and 0.1 foot-candle limits at property lines to protect our plant and animal neighbors.

We ask the developer refrain from using asphalt sealants that contain coal tar products. There has been substantial research examining the environmental impact of these products on natural ecosystems. Coal tar sealants contain Polycyclic Aromatic Hydrocarbons (PAHs) which pose adverse threats to aquatic organisms, plants, and humans when subjected to long-term exposure. The DuPage County Environmental Committee has urged communities to prevent the use of coal tar in DuPage County. Less detrimental and more environmentally safe alternatives to coal tar products exist.

Keeping roads and sidewalks free of snow and ice is essential, however, the principal ingredient in road salt is chloride, which is negatively impacting our wetlands, streams, and the plants and animals that live there. Non-chlorine deicers are less impactful and increasingly more available. We ask the developer to include language in any HOA Agreement to avoid traditional salt and require alternative forms of deicing.

The Forest Preserve District is the Grantee of an easement for the section of the Hesterman Drain storm sewer that runs through the northern portion of the Nokia property, and the Forest Preserve District is responsible for maintaining this section. The developer's Site Plans show the re-routing of this section of storm sewer, and the proposed route will make it difficult to access and more costly to replace or maintain in the future. The Forest Preserve District will not permit the re-route of the storm sewer and will require necessary access to the existing easement.

The Forest Preserve District objects to the placing of numerous residential lots adjacent to the Preserves and also the proposed reduced setbacks. The Forest Preserve District is concerned about encroachments by residential neighbors onto Forest Preserve District property (such as mowing, dumping landscaping waste, emptying rain gutters via drain tile, building structures, etc.) and can lead to destructive "foot trails" over Forest Preserve District property as residents access the Preserves. The Forest Preserve District strongly suggests that an HOA outlot of a minimum of 15 feet wide be located between the residential lots and all Forest Preserve District lot lines similar to the outlot shown on the plans along the development's west lot line.

Due to the proximity of the proposed development to the large-scale wetlands and natural areas on Forest Preserve District property, we recommend a consultation with the Illinois Department of Natural Resources (IDNR) for the presence of any Endangered and Threatened Species and any impacts that may occur to these natural areas as a result of the proposed development. As well, the Forest Preserve District requests copies of all certified wetland delineations and reports performed for this project.

Please consider this as the Forest Preserve District's request that this letter be read and entered into the public record at the December 16, 2020 Planning and Zoning Commission meeting. If you have any questions, please call me at (630) 933-7215.

Sincerely,

A handwritten signature in cursive script that reads "Ed Stevenson".

Ed Stevenson
Executive Director

cc: Daniel Hebreard, President
Forest Preserve District Commissioners
Dan Zinnen, Director of Resource Management and Development