



Forest Preserve District of DuPage County

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dupageforest.org

Sent via email: Planning@naperville.il.us

March 15, 2021

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,

In January and February, 2021, District staff has had various discussions with Pulte, and the District has exchanged letters with Pulte and the City of Naperville. We wish to present our latest understanding of items of interest to the District. We are presenting the following nine (9) topics in the general order they were addressed in our letter dated February 2, 2021 to the Naperville Planning and Zoning Commission.

1. Stormwater Runoff into Danada Forest Preserve

Pulte has clarified that runoff into Danada Forest Preserve will be limited to an area of 9.95 acres of land, reduced from the current drainage area of 17.45 ac. The contributing area is a mix of perimeter buffer with naturalized vegetation land cover, rear yards of several lots, and a small section of roadway. All runoff from yards and the road will be routed through a naturalized detention basin before release to the preserve. The estimated peak discharge rate for a 100 year, 24 hour storm event is 3.24 cfs, reduced from the existing conditions estimated rate of 10.5 cfs.

The District is not opposed to the proposed changes relating to stormwater runoff.

2. Vegetation Considerations

Trees

FPDDC has provided Pulte with two (2) lists of trees and shrubs:

- “Good/Favored Choices” (native trees and shrubs)(17 listed)
- “Neutral Choices” (Cultivars of natives or non-natives that do not spread)(17 listed)

Pulte has proposed a landscape plan which includes for parkway trees only trees from these 2 lists. Additionally, nominally 65% of the parkway trees will be from the “Good/Favored” list, and 35% from the “Neutral Choices” list.

In order to increase the availability of trees, promote diversity, and increase survivability, the District supports the use of smaller caliper size trees when advantageous for these reasons.

Non-Tree Considerations

Native Species

Pulte has committed to planting only native species in common areas that are proximate to the forest preserve, including the transitional buffer yard areas noted in Item 7. below.

Pulte has committed to planting non-native species only in areas where there would be no impact to the forest preserve (i.e., internal park parcel).

Pulte has committed that all plantings in existing wetland buffers, or in any common areas adjacent to FPDDC property, shall be limited to species native to northern Illinois (Residential Lots exempted).

Invasive Species

Pulte has committed to prohibiting listed invasive plant materials in all areas of development, including residential areas:

- Trees: Callery Pear, Norway Maple, Amur Maple, Cornus mas, Autumn Olive, and Black Alder
- Shrubs: Jap Barberry, Buckthorn, Amur Honeysuckle, Burning Bush, and Common Privet
- Perennials & GC: Purple Loosestrife and Purple Wintercreeper (Euonymus coloratus)

The District does not oppose the landscape planting plan as proposed and described above.

3. Lighting and Dark Sky Considerations

Pulte will use “Dark Sky” compliant light fixtures which will limit the light intensity at the FPDDC boundary to 0.1 foot candles or less.

The District is not opposed to the lighting systems proposed.

4. Coal Tar Products

FPDDC has requested that asphalt sealants containing coal tar products not be used in the proposed development. Pulte has committed that it will not use any coal tar products in its initial development of the property and that it will prohibit homeowners' use of coal tar products in future maintenance. Pulte has respectfully deferred to the City of Naperville and its standards for future maintenance of roadways.

We request Naperville specify that coal tar containing products not be used at this location or anywhere under the authority of the City.

5. Traditional Salt (Sodium Chloride) as a Deicing Agent

Pulte will include a provision in the Homeowners' Declaration that prohibits residents from using traditional salt for deicing private driveways and sidewalks.

Pulte defers to the City of Naperville as to how the City will maintain public roadways. We encourage the City to utilize alternative deicing agents more environmentally friendly than traditional salt.

6. Hesterman Drain Modifications

Pulte has proposed relocation of a section of the drain easement and associated storm sewer piping to immediately outside Lots 131 and 132, and deviating easterly from Lot 130. Pulte will provide a new 48 inch diameter concrete pipe and associated manholes, and will provide for a generally uniform ground surface above the pipe at an elevation generally above the design high water line. Pulte has provided calculations from a Licensed Professional Engineer indicating the proposed changes to the drain would not diminish the flow capacity of the pipe.

The District does not oppose the proposed changes to the Hesterman Drain.

Information regarding the proposed modifications to the Hesterman Drain was provided to the other stakeholders in the Hesterman Drain Intergovernmental Agreement (Wheaton Park District, City of Wheaton, DuPage County Public Works, DuPage County Division of Transportation, DuPage County Stormwater Management Department, and Milton Township Highway Department) on March 11, 2021. No comments from other stakeholders have been received by the District as of the drafting of this letter.

7. Transitional Buffer Yard Adjacent to Danada Forest Preserve Boundary

As part of Outlot B, Pulte will provide a 25 ft. wide buffer yard between Lots 132 – 147 and the forest preserve boundary to the west.

As part of Outlot C, Pulte will provide a nominal 25 ft. wide buffer yard between Lots 96 – 114 and the forest preserve boundary to the north.

The buffer yard will be planted with short to medium native grasses. The native seed mix and seeding rate was determined by Pulte with FPDDC input.

Pulte will install a split rail fence to delineate the boundary between the residential lots and the buffer yard.

The buffer yard will be maintained by the HOA. The FPDDC will not have an easement over the area.

The District is not opposed to the buffers, vegetation, and maintenance as proposed.

8. Brush Removal on District Property

The removal of brush on District property in association with the development is no longer proposed. The District does not object to this change.

9. Bird Considerations

Regarding the impacts to nesting eagles in Danada Forest Preserve, the FPDDC will defer to the opinion and recommendations of the US Fish and Wildlife Service.

Regarding the presence of herons nesting in Danada Forest Preserve in the area referred to as the Heron Rookery, FPDDC is unaware of authoritative science regarding heron sensitivity to disturbance by subdivision developments. As such, we are compelled to acknowledge and conservatively maintain our concern that the development could be detrimental to the continuing habitation of the rookery by herons.

Please consider this as the Forest Preserve District's request that this letter be read and entered into the public record at the March 17, 2021 Planning and Zoning Commission meeting. If you have any questions, please call me at (630) 933-7215.

Sincerely,



Ed Stevenson
Executive Director

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

March 12, 2021

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

Re: *Naper Commons – Pulte Home Company, LLC*

Dear Chairman Hanson,

As you know, I represent Pulte Home Company, LLC, a Michigan limited liability company (“Pulte”), regarding entitlements to facilitate the development of Naper Commons, a new mixed-residential subdivision proposed for Lot 4 of the Nokia Campus in the City of Naperville.

The project has generated feedback from a wide variety of interest groups- from City staff’s challenge to present a unique plan to late-breaking information about potential impacts to a bald eagle nest. Our team has consistently worked to provide practical answers to questions and incorporate community feedback into updated plans that maintain the integrity of the development concept for Naper Commons. We submitted revised plans to City staff on February 24th and believe that we have reasonably addressed all the issues that have been presented. There are a couple of details that I would like to identify in advance of next week’s hearing.

1. Density. The original submittal was 100% compliant with the density requirements of the existing R-2 zoning of the property. To be responsive to feedback, we’ve reconfigured the proposal and eliminated 17 units. The revised submittal is 227 total units made up of 43 Estate Series Homes, 118 Meadows Series homes and 66 townhomes. The subdivision is now well below Naperville’s “medium-density” and just above Naperville’s “low-density” classifications. At 3.51 du/ac, the proposal is appropriate given the location and existing R-2 zoning, and is well within the range of the adjacent Fairmeadow neighborhood - 1.44 du/ac and the Danada Townhomes - 6.1 du/ac.
2. Open Space. Open space is not a requirement of every residential development, but is a unique requirement associated with a planned unit development. In a planned unit development, open space provides a unique public benefit that justifies relief from the otherwise stringent requirements of the City’s zoning ordinance. 25% open space is required for a single-family detached residential subdivision. 30% open space is required for a single-family attached residential subdivision. At Naper Commons, a mixed-residential community, we are now providing 36.61% open space. Notably, this calculation does not include an extraordinary 2-acre public park that will be the centerpiece and primary attraction of the subdivision.
3. Buffer Yards. Under the City’s zoning ordinance, buffer yards are required between incompatible uses such as an office parking lot and adjacent single-family homes. The residential use at Naper Commons is not incompatible with the surrounding uses. Nevertheless, we have worked to incorporate significant buffer yards in the revised plan. Adjacent to the Danada Townhomes, utilities have been reconfigured to preserve existing trees and provide significant new landscape installations. Adjacent to Fairmeadow, a 55’ common area outlot will be owned and maintained

by the Naper Commons Homeowner's Association and planted with a significant new tree line. Adjacent to the Forest Preserve, a 25' common area outlot to be owned and maintained by the Naper Commons Homeowner's Association will be delineated by a split-rail fence and planted with a native plant mix specifically coordinated with the Forest Preserve staff. These buffer yards represent a significant dedication of private property to minimize perceived impact to adjacent parcels, even though they are not required by Naperville code.

4. Bald Eagles. The presence of a bald eagle's nest was first raised the day before the last public hearing. We immediately began to work with relevant experts to respond to these new facts. In coordination with the US Fish and Wildlife Service, the nest was identified and mapped. The Service notes that the nest is in the Forest Preserve and over 1,000 feet from any proposed residential lot. Based on the investigation, Cathy Pollack of the US Fish and Wildlife Service has advised that "no permit is recommended or required" and that "the distance of 824' (nest to nearest property line) is well outside an area of concern." A copy of the correspondence from Ms. Pollack has been provided to City staff.
5. Great Blue Herons. Great Blue Herons were not flagged in our EcoCAT investigation with the Illinois Department of Natural Resources because they are neither threatened or endangered species under state or federal law. According to the International Union for Conservation of Nature and Natural Resources (www.iucnredlist.org), the Great Blue Heron is neither "vulnerable" or "near threatened," but is ranked of "least concern" on their threatened and endangered species list. The US Fish and Wildlife Service has confirmed that there is no restriction or permitting requirement associated with the Great Blue Heron, stating only that "if trees where herons are breeding or roosting are to be removed for this project we recommend that they be removed outside of the nesting season." Naper Commons will not involve the removal of any heron habitat. Attached as reference is an article from the Daily Herald which quotes Eric Neidy, Director of Natural Resources for the Forest Preserve District of DuPage County, who comments that it is "very common" for rookeries to move around in DuPage County out of "natural necessity."
6. Forest Preserve District. The Forest Preserve District raised a number of "comments" in letters dated December 14, 2020 and February 2, 2021. We had the opportunity to meet with Forest Preserve staff on March 3, 2021. We were advised that the Forest Preserve was not "objecting" to Naper Commons, but raising "comments" that they believed to be important discussion points. We believe that we had addressed Forest Preserve comments by: i) evidencing reduced runoff and treatment of stormwater tributary to the Forest Preserve property; ii) coordinating native landscape installations directly with district staff; iii) agreeing to comply with International Dark Sky Association requirements; iv) prohibiting the private use of coal tar products; v) prohibiting the private use of sodium chloride products; vi) providing engineering calculations showing the relocation of the Hesterman storm sewer will not impact drainage; and vii) creating a dedicated 25' outlot to ensure residential yards do not encroach or otherwise impact the Forest Preserve.

As is our reputation, we have worked hard to refine project details and present practical solutions to community concerns. We sincerely appreciate the many hours you dedicate to public service and would respectfully request your recommendation of the revised plans for Naper Commons.

Very truly yours,

Russell G. Whitaker, III

Russell G. Whitaker, III
Attorney for Petitioner

Heron rookery no longer at Naperville site being eyed by developer



Great blue herons make their nests and rookeries among leafless trees in marshy areas so they can have enough space and see their predators. But when trees fall down or too many herons congregate in one spot, the animals tend to nest in a new location. (*Courtesy of DuPage County Forest Preserve*)



Marie Wilson

Updated

4/20/2018 9:41 AM

If neighbors oppose a residential development being considered for a site between the Nokia building in Naperville and Danada Forest Preserves, a great blue heron rookery won't be the reason.

A rookery that at its peak in 2008 featured 152 nests of the large, marshland birds now has moved on -- for its own natural reasons, forest

preserve officials say.

"While it may sound alarming, it's actually very common," said Erik Neidy, director of natural resources. "Our rookeries move around quite a bit in DuPage County."

That's not to say construction of houses, duplexes, townhouses and apartments -- which homebuilder K. Hovnanian Homes (<https://www.khov.com/>) is considering after a preliminary meeting with the Naperville City Council -- would have no affect on the 797-acre preserve.

But it could put at ease activists like the ones who worried about the Danada (<http://www.dupageforest.org/places-to-go/forest-preserves/danada>) rookery in 2014, when the Chicago Symphony Orchestra was considering buying the 58-acre site near Naperville and Warrenville roads for use as a summer concert venue.

Neidy said the rookery relocated out of natural necessity.

Great blue herons are "great hunters," Neidy said, and they make their homes in wetlands where they can snag fish, frogs and baby turtles, which they swallow whole. They look for barren, leafless trees in which to build their large nests and lay an average of four eggs a year. There, they gain a clear vantage point to be on the lookout for predators. Where herons can find food and protect their young, their rookeries thrive, Neidy said.

But gathering too many of the birds in one place can spell the beginning of the end. Blame the poop.

An acid found in the feces of great blue herons is "very strong," Neidy said, and speeds the process of tree death. Dead trees rooted in a soggy marsh can only stand for so long.

"The wind starts to knock down a lot of trees, so the nests start to fall apart," Neidy said.

That's likely what happened at Danada, where this flock of herons first set up a home in 1997 after moving from Pratt's Wayne Woods (<http://www.dupageforest.org/places-to-go/forest-preserves/pratts-wayne-woods>) on the northern side of the county, Neidy said. By 2004, there were 85 nests. Four years later, the count peaked at 152.

By the time Mary Lou Wehrli, a forest preserve commissioner, walked the site this spring in advance of an April 9 meeting about the Nokia property, she said the rookery was gone.

Neidy said forest preserve employees noticed the same thing last spring on their yearly count of rookeries, which is set to take place again later this season. Last year, the district observed one nest in Danada and 158 at a new location, Winfield Mounds (<http://www.dupageforest.org/places-to-go/forest-preserves/winfield-mounds>), so it's likely the former Danada birds moved there.

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630-355-4600 office
630-352-3610 fax

February 24, 2021

Development Review Team
City of Naperville
400 S. Eagle Street
Naperville, IL 60540

Re: Naper Commons – Pulte Home Company, LLC
Revised Plans

Dear City of Naperville,

Pulte has resubmitted documents in connection with the Naper Commons Project as of the date of this letter. For your convenience, below is a list of the changes that were made to the plans:

- Removal of 10 Meadows units and 2 Estates Units. Overall unit count is now as follows:
 - Townhomes: 66 Units
 - Meadows: 118 Units
 - Estates: 43 Units
 - **TOTAL: 227 Units**
- Inclusion of 25' landscape easement consisting of native grasses in the rear of lots adjacent to Danada Forest Preserve.
- Inclusion of a 55' buffer between Naper Commons and Fairmeadow Subdivision to provide additional separation between the two communities.
- Statement of Intent and Concept on PUD Plat has been revised to include the referenced 55' buffer between Naper Commons and Fairmeadow along with the 25' buffer between Naper Commons and the Forest Preserve District.
- All other submitted plans have been revised to reflect the aforementioned changes.

Should you have any questions regarding the revised plans for Naper Commons, please do not hesitate to reach out to our office to discuss.

Very truly yours,

Caitlin E. Csuk
Caitlin E. Csuk

From: Russell Whitaker <russ@rw-attorneys.com>
Sent: Tuesday, March 9, 2021 3:48 PM
To: Laff, Allison; Venard, Erin
Cc: Caitlin Paloian
Subject: FW: [EXTERNAL] RE: Pulte Development, DuPage County, IL
Attachments: EAGLE NEST SITE AERIAL w coords of Nest.pdf

CAUTION: This e-mail originated outside of the City of Naperville (@naperville.il.us).

DO NOT click links or open attachments unless you confirm the incoming address of the sender and know the content is safe.

Allison & Erin,

Attached is a map which depicts the location of the Eagle's Nest on the Forest Preserve Property. We provided information to US Fish and Wildlife, which is the relevant federal agency, and received the responses below. We think these emails address the heron/eagle issues in their entirety. Please note that we did not have the revised site plan at the time of communication with USFWS, so the attached map uses the old plan configuration. The boundaries do not change with the revised plan and homes are only shifted farther from the next in the revised configuration. Please let us know if you have any questions or concerns.

Russ

Russell G. Whitaker, III
Rosanova & Whitaker, Ltd.
127 Aurora Ave
Naperville, Illinois 60540
630-355-4600 (Office)
630-352-3610 (fax)
630-880-7273 (cell)

From: Rob Getz <Robert.Getz@PulteGroup.com>
Sent: Wednesday, February 10, 2021 9:33 AM
To: Russell G. Whitaker (russ@rw-attorneys.com) <russ@rw-attorneys.com>
Subject: FW: [EXTERNAL] RE: Pulte Development, DuPage County, IL

From: Pollack, Cathy <cathy_pollack@fws.gov>
Sent: Wednesday, February 10, 2021 9:27 AM
To: Rob Getz <Robert.Getz@PulteGroup.com>
Cc: Tom Velat <tvelat@dupageforest.org>
Subject: Re: [EXTERNAL] RE: Pulte Development, DuPage County, IL

Hi Rob,

Although you and I had spoken on the phone regarding heron rookeries, my comments had not addressed heron rookeries because the documents submitted for this proposed project do not indicate that the project would need to remove trees associated with any heron rookery which could result in the “take” of herons.

To be protective of the herons, if trees where herons are breeding or roosting are to be removed for this project we recommend that they be removed outside of the nesting season (the nesting season is early March to the end of August for most birds).

Thanks,
Cathy

Cathy Pollack
U.S. Fish & Wildlife Service
Chicago Ecological Services Office
230 South Dearborn Street, Suite 2938
Chicago, IL 60604
847-608-3101

From: Rob Getz <Robert.Getz@PulteGroup.com>
Sent: Tuesday, February 9, 2021 3:47 PM
To: Pollack, Cathy <cathy_pollack@fws.gov>
Subject: [EXTERNAL] RE: Pulte Development, DuPage County, IL

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Cathy –

Thanks for the email. I noticed there was nothing in relation to Herons, their presence near our site, or their ability to co-habitate with eagles.

Thanks for your help.

Rob

From: Pollack, Cathy <cathy_pollack@fws.gov>
Sent: Tuesday, February 9, 2021 3:32 PM
To: Rob Getz <Robert.Getz@PulteGroup.com>
Cc: Endrizzi, Deanne <deanne_endrizzi@fws.gov>; Tom Velat <tvelat@dupageforest.org>
Subject: Pulte Development, DuPage County, IL

External Sender

Dear Mr. Getz:

This email responds to your February 5, 2021 email, including seven attachments, regarding the proposed development of attached single family homes at a property located at 1960-2000 Lucent Lane, Lot 4 in the Nokia campus subdivision in Naperville, DuPage County, Illinois.

This proposed development is adjacent to Danada Forest Preserve which supports an active nesting pair of bald eagles (*Haliaeetus leucocephalus*).

Although bald eagles were removed from the Endangered Species List in August 2007, they are still protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Act.

I discussed your project with our Midwest Regional Office, Migratory Bird Permits staff. They advised me that most situations that require permits are where humans are moving into areas where eagles are not used to human disturbance of any kind, and within 100 feet of the nest. They also shared that foot traffic is more of a concern than vehicles or heavy equipment, especially in well populated areas as this, within an urban/suburban setting.

The Fish and Wildlife Service recommends applying for an Incidental Take Permit when activities, any time of the year, are within 330 feet of the nest, or if construction activities during the eagles' breeding season (Jan. 1 through August 30) are within 330 to 660 feet of the nest.

In this case, it appears that the closest boundary of the proposed project to the nest is 824 feet and that mature trees will remain between this boundary and the nest. For activities such as this, which are greater than 660 feet from a nest, no permit is recommended or required. This distance of 824 feet is well outside an area of concern.

If you have further questions regarding this particular project and eagle disturbance or incidental take permits please contact Deanne Endrizzi (copied here):

Deanne Endrizzi
US Fish and Wildlife Service
Midwest Regional Office, Migratory Bird Permits
Phone: 612-713-5441
Email: deanne_endrizzi@fws.gov

In discussing this project within my office, we note that developments occurring adjacent to wetlands and other natural areas can cause adverse impacts to the natural communities through water quality and quantity changes in stormwater runoff, through increased use of

insecticides and herbicides, and through introduction of invasive plants. We encourage you to work with the Forest Preserve District of DuPage County to incorporate conservation design principles and best management practices into your project to minimize these potential adverse impacts to the adjacent preserve lands.

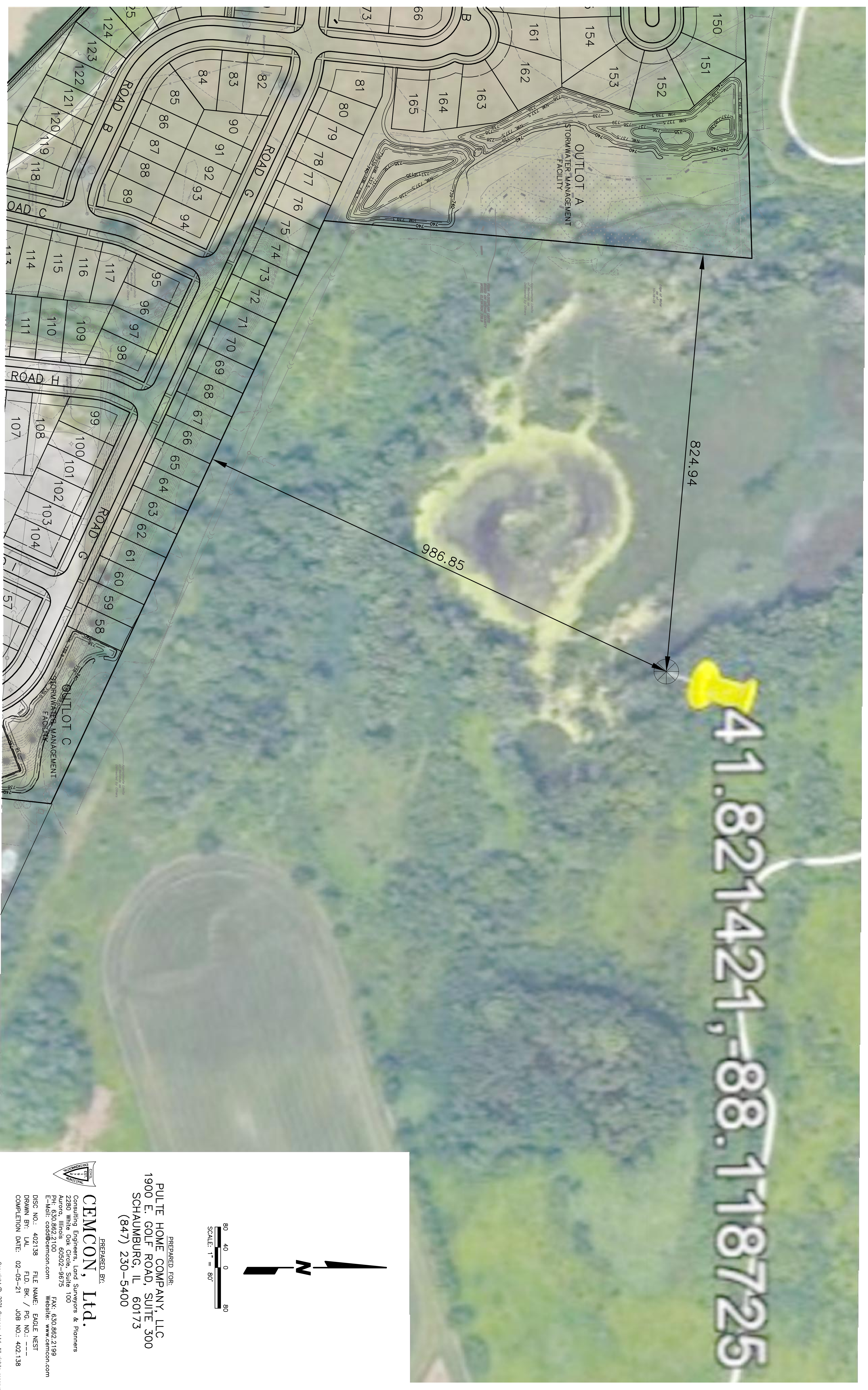
Thank you,
Cathy

Cathy Pollack
[U.S. Fish & Wildlife Service](#)
[Chicago Ecological Services Office](#)
230 South Dearborn Street, Suite 2938
Chicago, IL 60604
847-608-3101

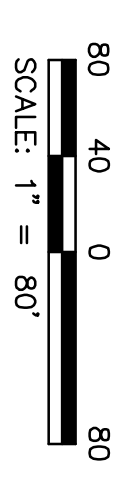
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EAGLE NEST LOCATION



41.8214221, -88.118725



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DISC NO.: 402138 FILE NAME: EAGLE NEST
DRAWN BY: LAL FLD. BK. / FG. NO.: ---
COMPLETION DATE: 02-05-21 JOB NO.: 402.138



**Forest Preserve District
of DuPage County**

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Sent via email: Planning@naperville.il.us

February 2, 2021

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,

On December 7, 2020, the District received a Public Notice regarding Pulte Home Company's petition for approval of: a Major Change to PUD; a 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). The District is aware that the aforementioned case was continued from the December 16 PZC meeting and will be presented at the meeting this Wednesday, February 3.

On December 16, the District submitted a letter to the Planning and Zoning Commission providing comments and concerns regarding the aforementioned Pulte development. On January 29, we received a letter from Pulte providing responses to our concerns, as well as revised site plans. After review of Pulte's responses and the revised plans, the District maintains its position on the development of the parcels identified above, and has 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. Pulte has acknowledged a willingness to use native plant species, but only in certain areas of the development. Plant seeds and pollens are easily spread by wind, animals, and runoff, so again we encourage the use of only native plant species known to the Chicago Region.

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.

Within the development, 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. While the District understands that the roads will be under the jurisdiction of the City, we ask that Pulte refrain from using coal tar products on any other surfaces within the development, including any trail connectors.

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. Our requested use of "non-chloride" products may have been misleading. The District does use chloride products, not "sodium chloride or salt" products. The District uses chloride products such as calcium chloride and magnesium chloride as they are more environmentally friendly than sodium chloride (salt). We extend this request to not utilize sodium chloride on the public roadways. Ecological damage is often caused by over-application of products as well, so in addition to HOA Agreement language prohibiting use of road salt, we request that the developer include strict guidelines regarding the rate of application of products.

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 in Pulte's January 29 letter to the District, they state "... (Pulte) has the right to change the configuration of the stormwater management system... ". The District encourages the Commission to carefully review and consider the Hesterman Agreement and the related drainage studies prepared to characterize the complex drainage system which encompasses and affects a large area of land and many property owners both upstream and downstream of the subject property.

Specific to the Hesterman Agreement, the District believes the modifications to the Hesterman Drain as proposed are subject to approval by the District.

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. Pulte has proposed a 10' landscape easement along the residential lots adjacent to District property, with a split rail fence delineating the useable backyard and easement area. Proper management of the proposed easement must be maintained in perpetuity - failure to properly maintain the easement by way of prohibiting the establishment of non-native or invasive species would result in no net gain from the proposed easement. The easement agreement should include language identifying maintenance responsibilities, requirements, and restrictions on the use of the easement area. It is recommended that this language be included in the HOA Declarations, along with the use of herbicides and cyclical mowing to prevent the establishment of invasive species.

While the District appreciates the assistance along the property lines with invasive brush removals, we request a second meeting to discuss the goals and outcomes of such work and whether or not these vegetation barriers may serve as an additional screen for the nesting colonies in the adjacent wetlands.

Since the previous IDNR consultation, the presence and documentation of a nesting Bald Eagle pair has occurred. Therefore, we recommend consultation occur with the USFWS and again with the IDNR due to the proximity of the development to the nests.

Please consider this as the Forest Preserve District's request that this letter be read and entered into the public record at the February 3, 2021 Planning and Zoning Commission meeting. If you have any questions, please call me at (630) 933-7215.

Sincerely,



Ed Stevenson
Executive Director

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



**Forest Preserve District
of DuPage County**

35580 Naperville Road
P.O. Box 5000
Wheaton, IL 60189

630.933.7200
Fax 630.933.7204
TTY 800.526.0857
dupageforest.org

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.

January 29, 2021

Sent VIA Email
estevenson@dupageforest.org

Forest Preserve District of DuPage County
Ed Stevenson, Executive Director
3S580 Naperville Road
P.O. Box 5000
Wheaton, IL 60189

RE: Naper Commons Subdivision, Naperville, Illinois

Dear Mr. Stevenson,

I represent Pulte Home Company LLC regarding the development of Lot 4 of the Nokia Campus property. By way of background, I initiated discussions with Forest Preserve District staff regarding the proposed development on November 11th. I hosted a Zoom meeting with Kevin Stough, Eric Neidy and Brock Lovelace on November 19th, at which time we had a detailed discussion about the project and coordination of issues such as i) installing a split rail fence to delineate the boundary between residential lots and the adjacent Forest Preserve Property; ii) brush hogging a 20' to 50' strip of overgrown and invasive species on the Forest Preserve Property; iii) prohibiting the installation of certain invasive species as part of the development project; and iv) constructing a pedestrian connection between the project and the existing path on the Forest Preserve Property.

We are in receipt of your letter to the Naperville Planning and Zoning Commission dated December 14, 2020. Below, we've restated each of the issues raised in your December 14th letter and provided a detailed response thereto. You will find our responses below each issue. Please note that I'm also attaching hereto updated landscape and engineering detail which reflects changes that have been incorporated into our project plans. I think you will see that we've addressed each of the issues raised by the Forest Preserve District. I sincerely hope that our efforts here will earn your support of the project as we move toward the Planning and Zoning Commission hearing on February 3, 2021.

- 1. The Forest Preserve District is concerned about stormwater runoff from the subject property. Both Preserves include ecosystems rated Class III and IV. These Preserves include wetlands where many bird species, including 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.*

Development of the Nokia Campus initially commenced in the 1960's. Prior to development the property was used for agricultural purposes. Since the 1960's, the entirety of the campus has been

“developed,” in that there is no natural condition presently existing on the property. Lot 4 of the Nokia Campus, which is the area subject to redevelopment by Pulte, is presently a parking field while other portions of the property have been utilized for athletic fields. Today, a portion of Lot 4 is tributary to Bell Pond via a modern stormwater system while other portions of the property drain directly into the adjacent Forest Preserve Property. In existing conditions, 17.45 acres of Lot 4 is tributary to the Forest Preserve Property. Water flows overland, through mown turf which has historically been fertilized, and is not put through any sort of modern treatment train or restrained in any manner.

Pulte’s development of Lot 4 will eliminate sheet flow into the Forest Preserve Property through a naturalized stormwater management system consistent with the requirements of the DuPage County Stormwater Ordinance. We believe that the modern stormwater system, which includes naturalized basins with landscape enhancements intended to restore pre-agricultural type habitat, will be a net positive to the adjacent Forest Preserve. In addition to eliminating sheet flow to the Forest Preserve Property, Pulte is reducing the area tributary to the Forest Preserve by approximately 13.33 acres. Note that none of the roadways or other paved surfaces associated with the development are tributary to the Forest Preserve Property. Moreover, water quality of the remaining drainage will be improved since water which ultimately enters the Forest Preserve Property will first pass through a native treatment train in the stormwater basin and through the new wetland buffer.

Pulte’s development plan for Lot 4 was designed around existing wetlands that straddle the common property line with the Forest Preserve District. Through development of Lot 4, these wetland areas will get dedicated buffers to be improved as a “wetland buffer with mix B1” per the Landscape Plan for Naper Commons. The new wetland buffer will provide a native habitat, which does not exist today, and will improve infiltration and provides filtration of water prior to entering the wetland.

In addition to reconfiguring the stormwater management on the property, the Developer is incorporating a 10’ landscape easement in the rear of lots immediately adjacent to the Forest Preserve District property (lots 58-76 & 146-151). This landscape easement will be comprised of native grasses, which will provide a natural buffer between Naper Commons and the Forest Preserve District. Storm sewer and an overland swale within this strip will intercept the runoff prior to reaching the Forest Preserve Property under the 100-year design storm. In a storm event greater than the design storm, the native vegetation will filter the runoff and sediment prior to entering the District’s property.

For all of these reasons, we believe that the proposed subdivision will actually provide a net benefit to the Forest Preserve Property through reductions in runoff rate and improvement of water quality entering the Forest Preserve.

- 2. The use of plant species that are non-native to the Chicago Region have a direct negative impact to natural areas and we discourage the use of hybrids and cultivars and hereby request only native species known to the Chicago region be used for all landscaping.*

We initially discussed this issue with Forest Preserve staff on November 19th. Pulte is happy to work with the Forest Preserve to address this concern in a couple of separate and distinct manners.

First, Pulte understands that the Forest Preserve has an existing problem with invasive species within

the Forest Preserve Property. Specifically, the Forest Preserve has a significant problem with buckthorn that is overgrown along the common property line. As part of our development work Pulte will voluntarily remediate invasive plants on the Forest Preserve Property adjacent to our common property line.

Second, Pulte is agreeable to limiting plantings within certain common areas. Specifically, Pulte would only plant native species in common areas that are proximate to the Forest Preserve Property. Non-native species would be used only in areas where there would be no impact to the Forest Preserve (i.e., the internal park parcel).

Third, Pulte would absolutely prohibit the use of common invasive species throughout the development, whether it be on common areas or private residential yards. The Homeowners' Declaration would specifically include this restriction, which would be enforced by the Homeowners' Association. Plants commonly used by residents, such as burning bush or callery pear, would be absolutely prohibited as a means of helping the Forest Preserve control issues with invasive species on its property. See Landscape Plan Sheet L.107.

- 3. We ask that the PZC heed the recommendations set forth by the International Dark Sky Association and Dark Sky society and require full cutoff shields on streetlights and 0.1 foot-candle limits at property lines to protect our plant and animal neighbors.*

Pulte would respectfully defer to the City of Naperville with respect to this request. The City imposes uniform standards with respect to streetlights that will ultimately be owned and maintained by the City. In lieu of any request from the City of Naperville, Pulte will install street lighting in accordance with the City of Naperville's Subdivision Regulations.

- 4. We ask that the developer refrain from using asphalt sealants that contain coal tar products.*

Pulte would respectfully defer to the City of Naperville with respect to this request. The City imposes uniform standards with respect to roadway improvements that will ultimately be owned and maintained by the City. In lieu of any request from the City of Naperville, Pulte would install roadways consistent with Naperville's Subdivision Regulations.

- 5. We ask the Developer to include language in any HOA Agreement to avoid traditional salt and require alternative forms of deicing the roads and sidewalks.*

Pulte will include a provision in the Homeowners' Declaration that prohibits residents from using traditional salt for deicing private driveways and sidewalks.

Pulte would defer to the City of Naperville with respect to how it will operate and maintain the public roadways following dedication.

- 6. The Forest Preserve District objects to and will not permit the re-route of the storm sewer and will require necessary access to the existing easement.*

As you are aware, the Property is subject to a certain Agreement for the Storm Water Management System for the Danada Hesterman Watershed dated May 29, 1984 and recorded in DuPage County

as Document No. R2011-060601 (the “Hesterman Agreement”). Under Section 6 of the Hesterman Agreement, the owner of the Nokia Property has the right to change the configuration of the stormwater management system, however the Developer must bear the cost of said changes and alterations to that system. Accordingly, Pulte has the right to re-route the storm sewer and will pay for the alterations in accordance with the terms of the Hesterman Agreement.

7. *The Forest Preserve District objects to the placing of numerous residential lots adjacent to the Preserves and also the proposed reduced setbacks and is concerned about encroachments by residential neighbors. The Forest Preserve District suggests an HOA outlot of a minimum of 15ft wide be located between the residential lots and all Forest Preserve District lot lines.*

Pulte has revised its plans to address concerns raised by the Forest Preserve. There are two different treatments adjacent to the Forest Preserve Property, with the type of treatment depending on a number of planning factors.

Pulte has reserved common areas that will be owned and maintained by the Homeowners’ Association along the west line of Naper Commons and adjacent to the existing wetlands. These areas will be replanted with native landscape to create a naturalized transition between Naper Commons and the adjacent Forest Preserve Property. Since these areas are currently developed with mown grass, the naturalized treatment and incorporation of storm sewer through these areas is certainly an improvement to existing conditions.

Along the north property lines, in the rear yards of lots 58-76 and lots 146-151, Pulte has proposed a 10’ landscape easement. The landscape easement will be platted as part of the subdivision and is clearly reflected on the Landscape Plan. The landscape easement and the character of the improvements thereto will also be incorporated into the Declaration that governs the development. Through these restrictions, the Homeowners’ Association, individual homeowners, and the City of Naperville would all have authority to enforce provisions of the easement. A split rail fence will delineate the boundary between usable back yard and the easement area. The easement area will be planted with native grasses as delineated on the Landscape Plan. These native grasses will help improve infiltration, will improve water quality, and will provide a natural transition from the residential lots to the Forest Preserve Property.

8. *We recommend a consultation with the 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.*

An application was submitted to the IDNR for the referenced consultation. Subsequently, we received a letter from the IDNR indicating the department evaluated the information with respect to protected resources in the area and concluded adverse effects from a residential development on the subject property are unlikely and the IDNR consultation was terminated.

9. *We request copies of all certified wetland delineation reports performed for this project.*

A Wetland Delineation for the Lot 4 property has been completed. DuPage County staff has field verified the findings contained in the Wetland Delineation. A copy of the Wetland Delineation has been submitted to Naperville. We have sent an electronic copy of the Wetland Delineation to Kevin

Stough.

Not raised in the response letter, but a material topic in our November 19th discussion with Forest Preserve staff was the creation of a dedicated connection to the existing Forest Preserve trail system. At the request of Forest Preserve staff we prepared and previously submitted the attached drawings showing the location and the character of the proposed trail connection. We believe that the proposed connection is a material and important improvement that will help to activate the use of the Forest Preserve Property not only for our residents, but also for residents in nearby subdivisions who don't currently have a direct access point. We respectfully request that the Forest Preserve confirm that the proposed trail connection will be permitted.

As you can see, we have taken comments from the Forest Preserve seriously and have thoughtfully addressed concerns. We believe that the changes improve the project and will ultimately benefit nearby residents and the Forest Preserve. We look forward to working with you and would request that you please reach out directly should you have follow-up questions or concerns.









Thank you.

Russell G. Whitaker, III

Russell G. Whitaker, III
Attorney for Pulte Home Company, LLC

cc: Allison Laff – laffa@naperville.il.us
Kevin Stough – kstough@dupageforest.org
Daniel Hebreard – dhebreard@dupageforest.org
Patrick Kelly – kellyp@naperville.il.us

Preliminary Plant Material Legend : (Sheet L.101 - L.105)

-  **Parkway Trees, 2.5" Caliper**
See Sheet L.106
-  **Shade Trees, 2.5" - 3" Caliper**
Autum Blaze Maple Swamp White Oak
State Street Maple Chicagoland Hackberry
Shawnee Brave Baldcypress Kentucky Coffeetree
Redmond Linden Exclamation London Planetree
Accolade Elm Bur Oak
Skyline Locust Triumph Elm
-  **Shade Trees, 8' - 12' m/s**
River Birch
-  **Ornamental Trees, 6' - 8' m/s**
Blackhaw Viburnum Prairie Fire Crab
Apple Serviceberry Ivory Silk Tree Lilac
Redbud Thornless Cockspur Hawthorne
Sargent Crab Common Witchhazel
-  **Evergreen Trees, 6' - 8' tall**
Norway Spruce Fairview Juniper
Colorado Spruce Wintergreen Arborvitae
White Pine Mission Arborvitae
Black Hills Spruce Canaerti Juniper
-  **Evergreen Shrubs, 18" - 24" wide**
Hughes Juniper Green Sargent Juniper
Kallay Compact Juniper
-  **Deciduous Shrubs, 18" - 36" tall**
American Filbert Grolo Sumac
Black Chokeberry Miss Kim Lilac
Dogwood Var. Viburnums Var.
Panicle Hydrangea Shrub Rose Var.
Texas Scarlet Quince Spirea Var.
Annabelle Hydrangea Elderberry
-  **Perennials, Orn'l Grasses & Groundcovers, 1gal.**
Feather Reed Grass Daylily sp.
Prairie Dropseed Blue Wonder Catmint
Switchgrass Black Eye Susan
Lilyturf Russian Sage
Aut. Moor Grass Allium sp.
Sedum sp. Amsonia sp.



Plant Material Restrictions :

Native Plant Material :

All plantings in existing wetland buffers, or in any common areas adjacent to Forest Preserve Property, shall be limited to species native to Northern Illinois. All Residential Lots are exempt from this requirement.

Invasive Plant Material :

Invasive plant materials (as listed below) are prohibited in all areas of the Development - including on Residential Lots.

Prohibited Invasive Species:

Trees : Callery Pear, Norway Maple, Amur Maple, Cornus mas, Autumn Olive and Black Alder
Shrubs : Jap Barberry, Buckthorn, Amur Honeysuckle, Burning Bush and Common Privet
Perennials & GC : Purple Lossestrife and Purple Wintercreeper (Euonymus coloratus)

Land Planning
Landscape Architecture
Environmental Site Design

132 N. WASHINGTON ST. - NAPERVILLE, IL 60540 - 800.305.3880 Fax 630.305.3894

project:

Naper Commons

Naperville, Illinois

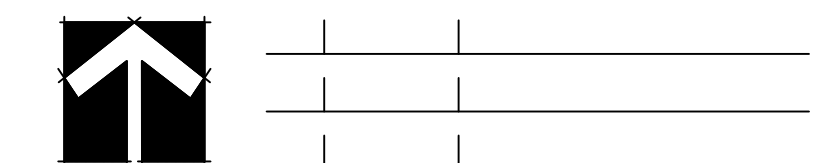
sheet description:

Plant Legend, Notes & Planting Details

owner:



north: scale:



1.20.2021	Per Revised Site Plan & Enhanced Buffers
11.18.2020	Per City Review #2
10.16.2020	Per City Review #1

original issue date: **14 September 2020**

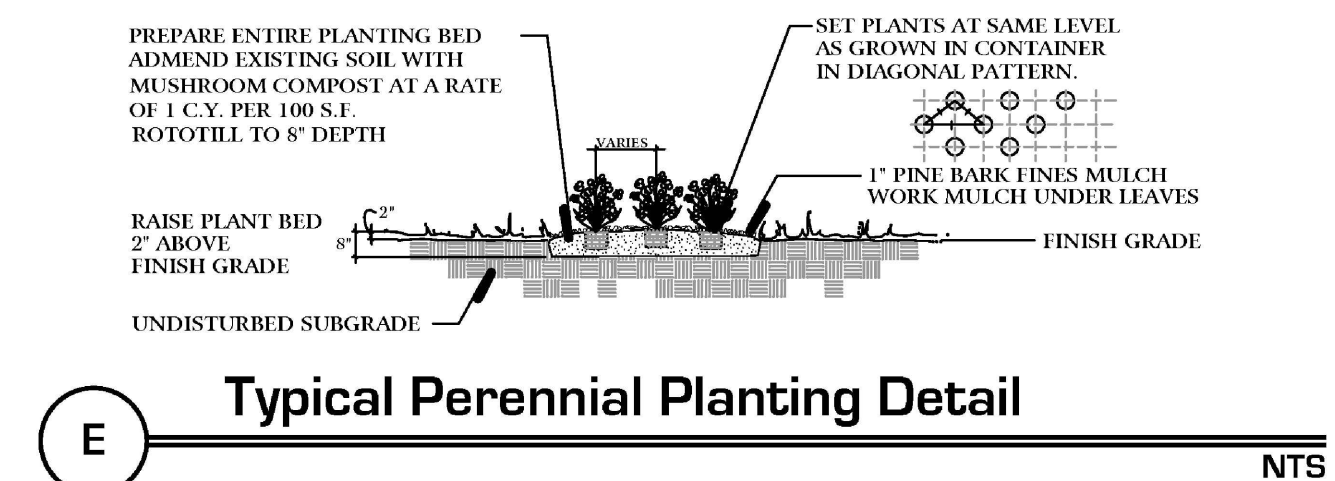
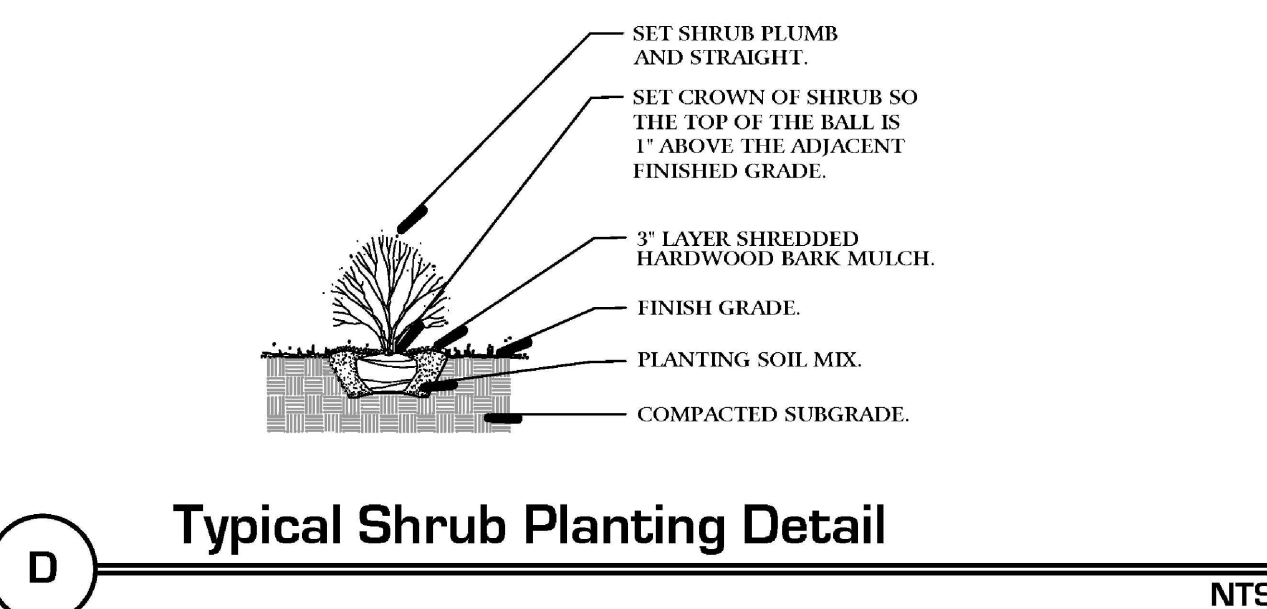
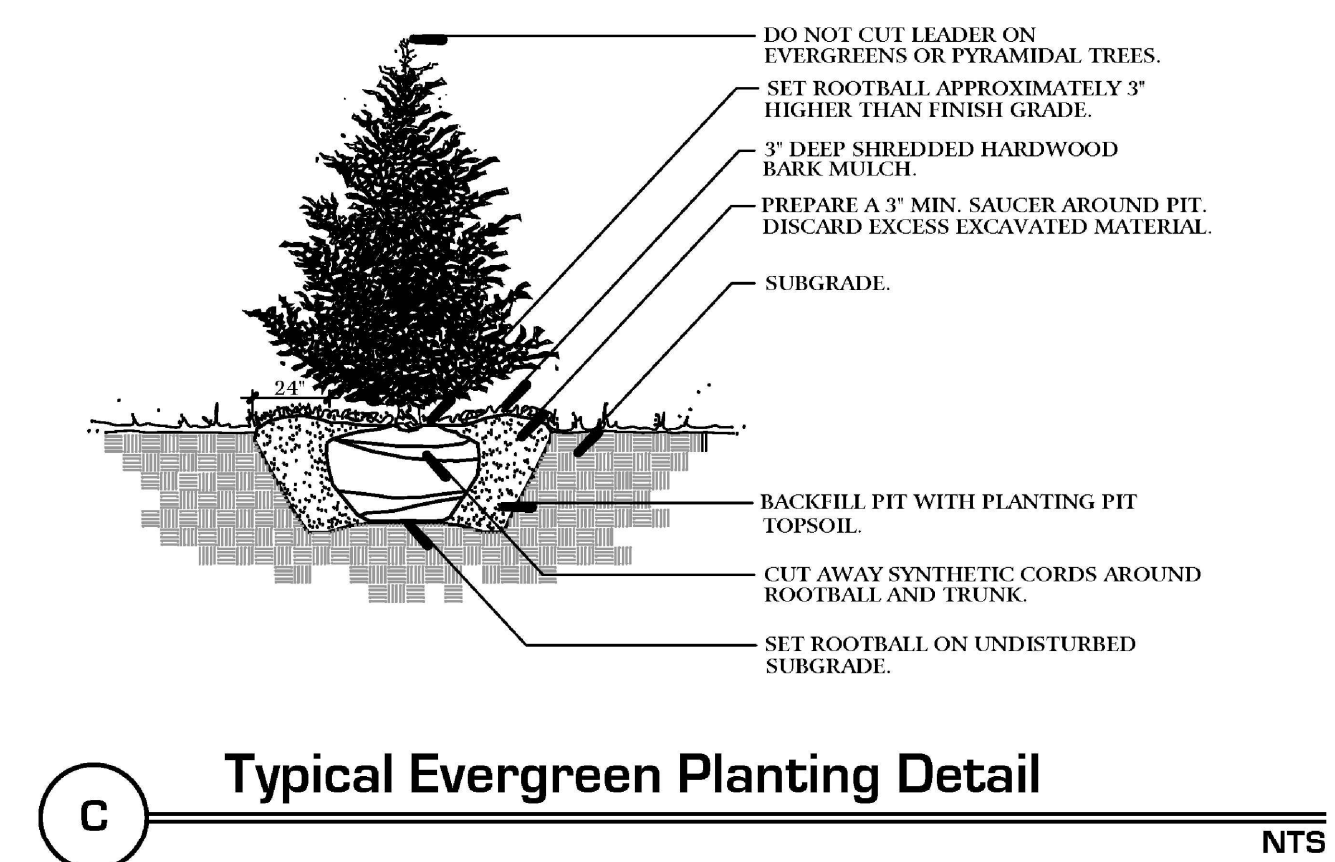
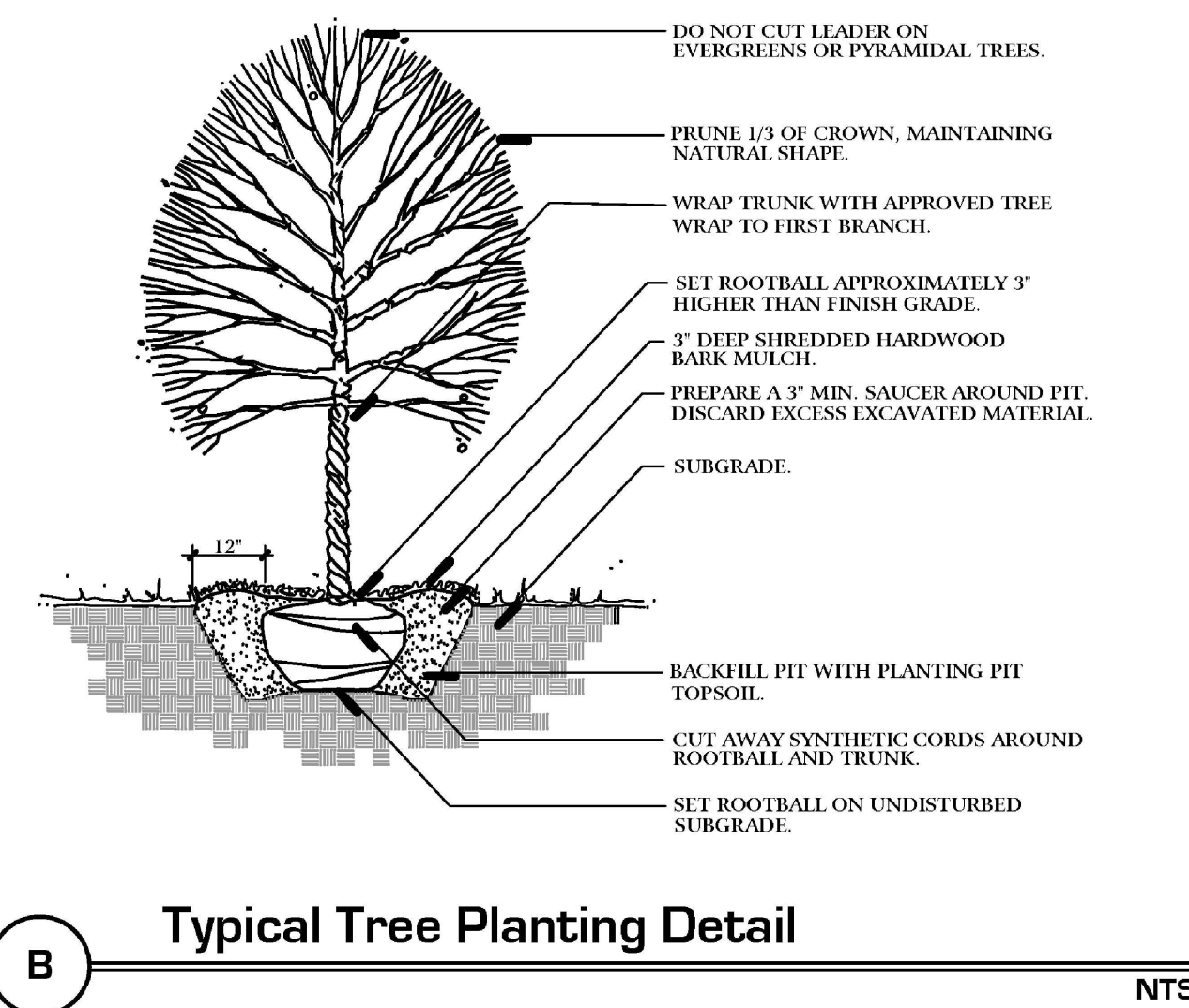
drawn by:
checked by:
project no.: **20219**
sheet no.:

Native Species :

- Proposed Plantings in all wetland buffer areas shall be species native to Northern Illinois

Construction Notes :

- Sod all turf areas as noted with an approved blend of improved Kentucky Bluegrass Sod with a mineral soil back.
- Drill seed all remaining turf areas as noted and cover with an S-75 Straw Erosion Control Blanket and staple in place. [See Sheet L.105 for Seed Mixes]
- Fine grading shall provide slopes which are smooth and continuous. Positive drainage shall be provided in all areas.
- Prior to turf installation all areas shall be fertilized with a 12-12-12 granular fertilizer at a rate of 400 lbs. per Acre.
- Prepare perennial, ornamental grass, groundcover and annual flower beds with 1 CY. mushroom compost per 100 SF. rototilled to an 8" depth.
- Mulch all trees, shrub, perennial & orn'l grass beds with a minimum of three inches shredded hardwood bark mulch.
- Mulch all groundcover and annual beds with minimum of one inch pinebark fines.
- All bed lines and tree saucers require a 4" deep spaded edge between lawn and mulch areas.
- All evergreen (conifers) trees and shrubs must be grown in a natural shape - and not sheared.
- Plant material sizing, branching and ball sizes shall conform to the "American Standards for Nursery Stock" (latest edition) by the American Association of Nurserymen, Inc.
- Plant material shall be nursery grown and be either balled and burlapped or container grown. Sizes and spreads on plant list represent minimum requirements.
- Quantity lists are supplied as a convenience. Contractor shall verify all quantities, and in case of a discrepancy, the plan shall prevail.
- The Landscape Contractor shall adjust plant locations in field to maintain appropriate spacing from fire hydrants, light poles, all utility structures, driveways and sidewalks. Approval of the Landscape Architect is required when field adjustments to be implemented do not conform to the intent of the plans.
- Contractor shall report any discrepancies in the field to the Landscape Architect and/or Owner.
- The Landscape Contractor shall verify locations of all underground utilities prior to digging, is required to Contact J.U.L.I.E. (1.800.892.0123), and any other public or private agency necessary for utility location 48 hours prior to construction.
- Where underground utilities exist, all field adjustments must be approved by the landscape architect.
- The Landscape Contractor shall water plant material, seed and sod areas until the plants have become adequately established and until final acceptance by the owner. Owner to provide all supplemental watering and proper care and maintenance of all plant materials, seed and sod areas after acceptance of Landscape Contractors work.
- No plants are to be changed or substituted without the approval of the Landscape Architect and the City of Naperville.
- Landscape Contractor shall warrantee all material and labor for a period of one year from the date of final acceptance and shall repair any defects and replace all dead plant material as required during the warranty period.**
- Trees shall be set back a minimum of ten (10) feet horizontally from utility structures, including, but not limited to, manholes, valve vaults, valve boxes, fire hydrants, transformers and switch cans. Trees shall be set back a minimum of five (5) feet horizontally from sanitary sewer, water services and underground electric cable. Approval of the Landscape Architect is required when field adjustments to be implemented do not conform to the intent of the plans.
- Parkway Trees must be offset 5 feet from all storm sewer.
- No trees, shrubs or obstacles will be allowed 10' in front, 5' on the sides, and 7' to the rear of the electrical transformer.



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