

ALTERNATIVES ANALYSIS from permit application dated March 17, 2023

Braun Property Development, LLC is proposing the construction of an industrial complex to meet the growing demand for the local industrial manufacturing, housing and shipping demands of the local Whitestown as well as the regional demands of the greater Indianapolis area. A 0.69-acre isolated, Class III, forested wetland, Section I, was delineated within the limits of the project.

The project area is uniquely situated between White Lick Creek to the west and residential homes to the east. Due to the position of White Lick Creek as well as the floodway, there is limited space for a functional development. Building 4 was design to fit vertically to maximize the remaining developable area. The detention basins to the west were designed to fit the smallest area, while providing the necessary stormwater detention area. Two (2) building configurations were designed for Building 4 that were evaluated regarding the wetland impacts and economic feasibility.

Concept Plan (Preferred)

The preferred Concept Plan proposes the construction of a +/-620,160 square foot building, dock positions and trailer spacing. A road connecting to an extension of the Ronald Reagan Parkway will be constructed east of the trailer parking area. The preferred Concept Plan impacts the entire 0.69 acres of isolated, Class III, forested wetland delineated within the project site.

Alternative (No Impact)

The alternative Concept Plan proposes the construction of a +/-511,360 square foot building, dock positions and trailer spacing. A road connecting to an extension of the Ronald Reagan Parkway will be constructed east just outside the wetland. This alternative avoids wetland completely.

Conclusion

Proceeding with the proposed alternative will lose approximately 108,800 square feet of warehouse and production space as well as a reduction in trailer parking spaces. This was economically evaluated and would result in the financial loss of \$10,300,000 based on the current market value. The avoiding this area to protect the wetland would not be marketable with the loss of warehouse/production space and dock and trailer space. In addition, the wetland will be further isolated between concrete docking area and a roadway and potentially future industrial area. Therefore, avoidance or minimization is not possible based on the developed needs as described.

Response to HEC comments

May 16, 2023

The application did provide a review of alternatives to the proposed development. I have discussed opportunities for avoidance and alternative design options with the developer and project engineers.

From the developer's investment backed expectation, the financial impact of a \$10,300,000 loss incurred by reducing the building size is not practicable or economically feasible.

The building size and configuration are critical to the project success. Other factors to be considered in design and layout are floodway limitations, compensatory storage and detention requirements. Impacts to floodway are avoided due to hazards to life and property on and off-site. Compensatory storage is required for encroachment into floodplain to address flooding

issues. Detention is also an unavoidable requirement. The location of floodplain compensation is dictated by proximity to floodway.

The engineer determined an alternative layout could be feasible if the detention were modified in order to shift the building to the west. This would require increasing fill for the building pad to maintain elevation based upon floodway, which in turn would increase the foot print of the build pad to account for increased side slopes of the building pad. The detention area would be reconfigured to the east of the building site and wetland.

This alternative layout could reduce the wetland impact by approximately 30%. It must be noted that the elevation of the detention would be lower than the wetland elevation resulting in dewatering the remaining wetland. The alternative design would result in the permitted loss of over half the wetland area and requisite detention would cause the loss of the remaining wetland. The additional cost of earthwork would add financial impact to the developer. While the alternative is potentially feasible, the development would still require the impact the wetland by fill and the resulting detention would effectively drain the remaining wetland. The added cost of this alternative does not justify the minimal wetland avoidance it provides. The secondary impact to the wetland by drainage, fragmentation and isolation render the option unsuitable for both development and wetland protection. The alternative layout is not a feasible alternative.

The planned extension of Ronald Reagan Parkway to the west of the site must also be considered in review of the project area. The area east of the wetland will be developed concurrent with extension of Ronald Reagan Parkway further fragmenting and isolating the wetland if avoided or minimized. This may be viewed as a negative environmentally but that does not change the reality of the planned development of the area.

The proposed development plan provides for the construction of a +/-620,160 square foot building, dock positions, trailer parking, compensatory storage, and detention. The proposed development plan will cause the impact of 0.69 acres of isolated, Class III, wetland. The wetland impact will be mitigated at 2.5:1 through the Indiana In-Lieu Fee Mitigation Program resulting in a net gain of wetland. The proposed development plan is the preferred alternative.