



U.S. Army Corps of Engineers
Louisville District
ATTN: Kimberly J. Simpson, CELRL-RDN, Rm 752
P.O. Box 59
Louisville, Kentucky 40201-0059
Phone: 502-315-6691

March 8, 2019

**Re: Public Notice ID No. LRL-2018-01102
6095 River Road, Cincinnati OH (Hamilton County)**

Dear Mrs. Simpson;

This letter is a response to an application currently being considered by the US Army Corps of Engineers, Public Notice No ID No. LRL-2018-01102. The project is a new truck-to-barge transloading facility proposed by the applicant POET Nutrition, Inc. from Sioux Falls, South Dakota.

The Western Wildlife Corridor, Inc. is a Cincinnati-based 501 (c)(3) nonprofit nature conservancy land trust formed in 1992. Our mission includes the protection of natural habitat along the Ohio River Valley from the Mill Creek to the Indiana line, and we own and manage nature preserves in the immediate vicinity of the proposed Transloading Facility at 6095 River Road. These include the Bender Mountain Nature Preserve and the White Tail Woods Nature Preserve. Equally important are other adjacent forested properties that are protected by other landowners. Together these form a critically important habitat for many species native to the Ohio River Valley. To cite a few examples, in the Bender Mountain Nature Preserve, according to a peer-reviewed research paper published in 2017, a plant survey identified more than 430 different species of vascular plants in that preserve. Furthermore, a formal study performed in 2016 described the local population of the Cave Salamander (*Eurycea lucifuga*) as being "the densest population known in Ohio." Finally, among other amphibian species seen in the immediate vicinity, the only known example in Hamilton County of the Pickerel Frog (*Lithobates palustris*), was seen in this area.

Given this rich biodiversity, we are very concerned about the potential impacts to the natural habitat by this proposed Transloading Facility along the Ohio River, extremely close to these natural areas.

Western Wildlife Corridor's mission is to preserve and protect the scenic beauty and natural environmental integrity of the Ohio River Valley along Cincinnati's western riverfront, and one of the ways we accomplish this is through the promotion of responsible land use. To us, responsible land use doesn't simply mean opposing development; it means advocating for development done in an environmentally responsible way. Following is a list of concerns and associated recommendations to minimize the environmental impact of this proposed project.

Concern; Wetland Mitigation efforts proposed are through a wetland bank that's far removed from the impacted area.

Recommendation; Western Wildlife Corridor recommends that the applicant make a positive environmental impact closer to the project site. Since wetland bank credits are unavailable within the immediate region or watershed, consider other ways to make a positive impact in the immediate area by dedicating some portion of the site as greenspace in addition to the wetland credit purchase proposed. Or commit to protecting or preserving some amount of wetland or forest land nearby to offset the impact of the proposed disturbance and operation. Also, make a positive environmental impact by supporting local alternative transportation efforts by providing passage through the site for the proposed Ohio River Trail.

Concern; The proposed use generates a significant amount of vehicular traffic. Aside from leading to additional congestion on Rt 50, this generates exhaust emissions that will impact surrounding natural areas, including adjacent land conservation efforts of the Western Wildlife Corridor at Whitetail Wood and the Bender Mountain Preserve.

Recommendation; The City's land use plans have long called for our Western Riverfront to be used for industrial purposes. However, a large portion of these lands are idle and unused (including this property), and as such have become diverse de facto wildlife sanctuaries. Western Wildlife Corridor recommends that the applicant take all measures practical to reduce the amount of traffic, and also the amount of pollutants introduced to the area. This could mean committing to a maximum amount of trucks per day, and/or using alternative fuel vehicles.

Concern; The proposed use impacts wildlife that use this plot to move between the river and the wooded hillsides to the north.

Recommendation; While we understand that this site is zoned as industrial property, the current state for many years has been that of natural greenspace. Our preference of course would be to keep this property entirely as natural greenspace for native habitat and would advocate for not developing this property if at all possible. That said, should development proceed, Western Wildlife Corridor strongly recommends a permanently dedicated corridor through the project site to remain as greenspace connecting the river's edge to the property boundary to the north to preserve a connection for wildlife. We recommend a green corridor a minimum of 200ft in width or more, permanently dedicated through a conservation easement or deed restriction. Additionally, if properties adjacent to the east can be acquired, those too should be committed as greenspace. Western Wildlife Corridor would certainly be interested in partnering to achieve these goals.

Concern; the bulk storage of materials on site could present an environmental hazard to adjacent wetlands, natural areas, and the Ohio River waterway.

Recommendation; Western Wildlife Corridor recommends that the US Army Corp of Engineers, or other appropriate oversight agency review the applicants process for moving and storing their products to ensure that their materials aren't transmitted into nearby natural areas. Verify the potential hazards of the product(s) the applicant moves and stores, and the implications for water quality and wildlife if small amounts are inadvertently released into natural areas, or if large quantities are released in catastrophic event.

Concern: Up through the 1990s, this site was used as an automotive salvage yard. The potential exists for the site to have pollution or contamination from any number of automotive products including motor oil, gasoline, and other petrochemicals.

Recommendation: Western Wildlife Corridor recommends that the applicant assess the entire site for pollutants or contamination, including any areas that might not currently be proposed for development, and mitigate any and all environmental issues discovered.

We believe that with appropriate care and planning, the proposed development can be done while minimizing the impact to the adjacent environment and neighborhoods. Western Wildlife Corridor is supportive of this development if it succeeds in 1) initiating cleanup of a polluted or contaminated site, 2) permanently preserves a portion of the site as natural habitat and, 3) permanently preserves access for wildlife from the Ohio River to the hillsides beyond. We hope and believe that POET Nutrition shares the Western Wildlife Corridor's understanding of the critical importance of being good stewards of the Earth. We're happy to continue dialogue and even consider the possibility of partnering to make sure that we're both successful in achieving our goals to the greatest extent possible.

Thank you for your consideration of our input on this project.

Respectfully Submitted,



Tim Sisson, President
Western Wildlife Corridor, Inc.
P.O. Box 389077
Cincinnati, Ohio 45238
Phone: 513.921.9453