



LEONARD GELFAND
STEM CENTER

December 8, 2015

Mr. Keith C. Sendziak
U.S. Army Corps of Engineers, Buffalo District
1776 Niagara Street
Buffalo, New York 14207

Dear Mr. Sendziak:

Please accept our position statement with regard to property in the City of Brooklyn, Ohio north-west of the intersection of Tiedeman and Biddulph Roads (Cuyahoga County) under consideration for construction for the IKEA Corporation.

Environmental Heroes IKEA Position Statement

The Environmental Heroes would like to speak out on the issue of the proposed building of an IKEA store in Brooklyn, Ohio, on a property that is an important forested wetland. These category 2 wetlands are a part of the Big Creek watershed which is a part of the larger Lake Erie watershed. We would like to oppose IKEA's building on this site.

The Environmental Heroes is a middle and high school based environmental science group developed by the Leonard Gelfand STEM Center at Case Western Reserve University. Since 2007, we have been conducting authentic field science, collecting data for the Cleveland Metroparks, the Ohio Lake Management Society/Ohio EPA, and for ODNR on our research question of what factors impact the abundance and distribution of amphibian and reptiles in the Ohio and Erie Canal Reservation. We are all certified for Level One Quality Data Collectors (QDC) through the Ohio Lake Management Society-Ohio EPA.

We would like to make it clear that we are not opposed to IKEA's building in the Cleveland area. In many ways, we realize the benefit to the economy and workforce that a new IKEA would bring to the area. We would support them if they built on any of the 32 other sites that they have considered.

Ohio has lost more than 90 percent of its wetlands. We continue to lose many of our few remaining wetlands to construction and to other projects by people who may not understand the negative effect removing a wetland could have. Wetlands are important, complex ecosystems that benefit both our lives and the natural world around us. These wetlands have critical environmental as well as aesthetic functions.

Many wetlands serve as a natural filter to a larger body of water. Both rain and runoff water may contain harmful chemicals and sediment that will flow into a wetland instead of into a river or lake. When the sediment reaches the wetland it sinks to the bottom and when the chemicals enter the water the plants and bacteria remove them. These wetlands help prevent chemicals

and destructive organisms from entering Lake Erie, one of the Great Lakes and one of our main sources of drinking water.

Good quality wetlands serve as a very effective flood buffer. This particular wetland helps to prevent flooding in the Big Creek Watershed, which includes the Cleveland Metroparks Zoo. This Zoo has had significant and damaging floods on February 28, 2011 and October 29, 2012. Property damage was costly and a bird of prey that was used in wildlife shows was lost to the floods. If the wetlands are removed, the Zoo and other areas could face devastating and costly flooding. IKEA has proposed an underground stormwater detention system, but replicating the effect of these established wetlands with current technology is difficult and uncertain.

Removing the wetlands from this site could potentially impact several threatened or endangered species. These include the Kirtland's warbler, the Indiana Bat, and the Northern Long Eared Bat. These animals are important links in this ecosystem.

Wetlands and other green space can improve the aesthetics of a location. The EPA has said, "Green infrastructure's vegetation and trees can increase publicly available recreation areas, allowing urban communities to enjoy greenery without leaving the city." An urban area should have at least 15 to 20 percent of its area dedicated to green space. The Friends of Big Creek state that "Over 90 percent of the [Big Creek] watershed's area has been developed and nearly 40 percent of the land surface has been made impervious, making Big Creek the most heavily urbanized watershed of any major tributary in the Cuyahoga River Watershed." The statistics show that this watershed already has less than the recommended amount of green space an urban area should have. The Big Creek Watershed is one of the largest contributors to the water in the Cuyahoga River. While relocating one wetland may seem insignificant, this particular wetland has significant value in this watershed. Removing 15.5 acres of established wetlands is not something that can be ignored.

Trees, shrubs, grass and other plants remove smoke, dust and other pollutants from the air. One tree can remove 26 pounds of carbon dioxide from the atmosphere every year, the same as a car driving 11,000 miles. One acre of trees has the ability to remove 13 tons of particles and gases annually. 2,500 square feet of plants, such as grass and moss, and soil, while absorbing carbon dioxide from the atmosphere, can release enough oxygen for a family of 4. Plants reduce the air temperature of cities where buildings and pavement reflect heat from the sun by providing shade and through a chemical process called evapotranspiration. Every wetland that is removed increases the amount of pollution in the air and increases the air temperature.

Mitigated wetlands only have a 50 percent success rate. According to a representative from the North East Ohio Regional Sewer District, IKEA is looking to mitigate in Sandusky, Ohio. Even if the new wetlands are successful, Sandusky is too far away from the original location to provide the same effects as these current wetlands. Unfortunately, it will be very difficult to find the over 30 acres IKEA would need to create new wetlands within the Big Creek Watershed.

Our concerns about the development on this property made us consider what makes a company a good corporate citizen. A good corporate citizen is a corporation that benefits the community by providing jobs, creating goodwill, responding to the concerns and needs of the community, treating customers and workers with respect and minimally impacting the environment. This request to remove 15.5 acres of one of Brooklyn's few remaining wetlands is a concern.

In 2012 and 2014 the forestry subsidiary company of IKEA, Swedwood, was fined for cutting down 600 year old trees in the northern part of Karelia, Russia. On October 18, 2015 *The Plain Dealer* published an article about IKEA's plan to cut down 600 trees in northern Columbus in order to make their sign more visible from interstate 71. This does not seem to be in line with IKEA's Sustainability Strategy.

On IKEA's website they published a statement titled *People and Planet Positive: IKEA Group Sustainability Strategy for 2020*. At the end of the document the company created a sustainability dictionary. We feel that by building on the wetlands the company would be violating many of their own principles, including Climate Positive, Forest Positive, Planet Positive, and Sustainable Development. We hope that IKEA will live up to the values that they defined.

In light of the issues discussed, The Environmental Heroes would like to recommend that the building permit for the proposed site be denied.

Respectfully Submitted,

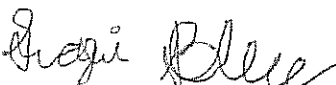
The Environmental Heroes Advocacy Team

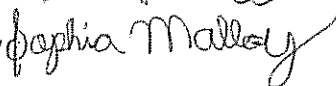
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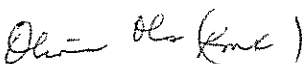
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Addendum:

IKEA Sustainability Philosophy- excerpts :

Climate positive: Where the overall impact of our business, from the energy that powers our stores to the products our customers use at home, is positive by reducing more emissions than we cause and promoting the fast uptake of clean technology.

Forest positive: IKEA is committed to promoting sustainable forestry and land use practices, beyond our needs, that integrate forest protection and restoration. Over all, our activities will safeguard forest biodiversity at landscape level and we will ensure a long-term balance between harvest of wood and forest re-growth.

Planet positive: IKEA puts more in than we take out and use resources with the utmost efficiency where we work towards a closed loop society where waste is turned into resources.

Sustainable Development: United Nations definition: Development that meets the needs of the present without compromising the ability of future generations to meet their own need (coined by the Bruntland Commission in 1987)