

IEPA Log No.: **C-0103-17**  
CoE appl. #: **LRC-2016-00572**

Public Notice Beginning Date: **June 18, 2019**  
Public Notice Ending Date: **July 9, 2019**

Section 401 of the Federal Water Pollution Control Act  
Amendments of 1972

### **Section 401 Water Quality Certification for Discharge of Dredged or Fill Material**

#### **Public Notice/Fact Sheet Issued By:**

Illinois Environmental Protection Agency  
Bureau of Water  
Permit Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276  
217/782-3362

**Name and Address of Discharger:** CyrusOne LLC – 2905 Diehl Rd, Aurora, IL 60502

**Discharge Location:** Near Aurora in NE 1/4 of Section 7 of Township 38-North, Range 9-East of the 3rd P.M. in DuPage County.

**Name of Receiving Water:** Indian Creek and Unnamed Wetlands

**Project Description:** Proposed expansion of an existing datacenter.

The Illinois Environmental Protection Agency (IEPA) has received an application for a Section 401 water quality certification to discharge dredged or fill material into the waters of the United States associated with a Section 404 permit application received by the U.S. Army Corps of Engineers. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. The last day comments will be received will be on the Public Notice period ending date unless a commenter demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters shall provide their names and addresses along with comments on the certification application. Commenters may include a request for public hearing. The certification and notice number(s) must appear on each comment page.

The attached Fact Sheet provides a description of the project and the antidegradation assessment.

The application, Public Notice/Fact Sheet, comments received, and other documents are available for inspection and may be copied at the IEPA at the address shown above between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please contact Darren Gove at email [darren.gove@illinois.gov](mailto:darren.gove@illinois.gov) or phone no. 217/782-3362.

DRG:C-0103-17\_401 PN and FS\_06Apr17.docx

Fact Sheet for Antidegradation Assessment  
For CyrusOne LLC  
IEPA Log No. C-0103-17  
COE Log No. LRC-2016-00572  
Contact: Abby Brokaw 217/558-2012  
Public Notice Start Date: June 18, 2019

---

CyrusOne, LLC, (“Applicant”) has applied for a 401 Water Quality Certification for impacts associated with the proposed project to expand the existing data center into an adjacent parcel at the southwest corner of Eola Rd. and Diehl Rd. in Aurora, Illinois (NW Quarter of Section 7, Township 38 N, Range 9 E). The expansion project includes buildings, storage, stormwater management, and all required parking and utilities to supplement the current platform and apply modern infrastructure requirements. The proposed expansion is unique in its demand for adequate power, security, and space available for infrastructure limitations. The selected parcel is adjacent to the current data center and has access to the existing power substation. Available, vacant sites with the ability to provide adequate power are limited and sharing this utility would limit stress on other power systems.

The selected parcel currently consists of agricultural field used in the production of row crops with wooded clusters existing along the borders and in the north and southwest corners. Five wetlands have been identified within the project area totaling 2.93 acres with impacts to three wetlands, totaling 1.91 acres. The applicant has proposed off-site mitigation via a mitigation bank.

The purpose of the proposed project is to expand the existing data center by constructing a large facility (581,000 square feet) to supplement the current platform and modernize the infrastructure requirements. Information used in this review was obtained from the project narrative and plan, “Site Improvement Plans for South Pond Modifications at Veridian,” dated January 5, 2018, and updated information provided by the Applicant.

### **Identification and Characterization of the Affected Water Body**

The project area is made up of two parcels totaling 28.8 acres with five identified wetlands on site. Three of the five identified wetlands would be impacted by the proposed project.

Wetland	Size (acres)	FQI	Quality	Jurisdiction	Impact (acres)
Wetland 2	1.56	9.25	Medium	USACE	1.46
Wetland 3	0.35	7.16	Medium	Kane County	0.35
Wetland 5	0.10	4.20	Low	Kane County	0.10

Wetland 2 (approximately 1.56 acres) is located in the eastern portion of the project area and is a complex that includes a large emergent pond and an excavated ditch that runs along the Illinois Prairie Path. Wetland 2 is not considered a high-quality aquatic resource. The Coefficient of Conservatism for Wetland 2 is 2.31 and the Floristic Quality Index (FQI) is 9.25. These values indicate a low to moderate quality plant community.

Wetland 3 (approximately 0.35 acres) is located in the southwest corner of the project area and extends from the adjacent prairie path north through the wooded area. Wetland 3 is not

considered a high-quality aquatic resource. The Coefficient of Conservatism for Wetland 3 is 3.20 and the FQI is 7.16. These values indicate a moderate quality plant community.

Wetland 5 (approximately 0.10 acres) is located in the northeastern boundary of the project area, which is a small, sparsely-wooded depression north of the emergent body. Wetland 5 is not considered a high-quality aquatic resource. The Coefficient of Conservatism for Wetland 5 is 1.80 and the FQI of Wetland 5 is 4.20. These values indicate a low-quality plant community.

### **Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses**

The pollutant load increases would include increases in total suspended solids (TSS). This increase, a normal and unavoidable result of the reconfiguration and expansion, may occur at the point of construction activity. Benthic habitat would be disturbed in the construction area, but localized impacts to aquatic life uses are not anticipated.

### **Fate and Effect of Parameters Proposed for Increased Loading**

The TSS increase would be local and temporary. Permanent impacts of 1.91 acres of wetlands would be mitigated at a 1.5:1 ratio by purchasing 2.87 mitigation credits between the Land and Water Resources, Inc. and the Gray Willows Wetland Mitigation Bank.

### **Purpose and Social & Economic Benefits of the Proposed Activity**

The proposed project provides the local community with economic benefits from the construction of a data center, office space, stormwater management facility, and job creation.

### **Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation**

The proposed project is unique in its high demand for adequate power, security, and specific infrastructure that restricts available site options. The selected parcel is adjacent to the existing data center allowing for shared resources, such as parking, site access, power, and stormwater management. Also, site access to the planned location is limited to three access points, which is important for the security of sensitive information.

Relocating to “another site location” alternative is not feasible because this proposed expansion makes use of the existing infrastructure servicing the existing facilities and required to service the new facility expansion. This infrastructure includes the direct proximity to the ComEd substation, existing site security infrastructure, and existing utilities.

A “no impacts” alternative is also not feasible because municipal zoning and fire ordinances require buffer areas, utility easements, and fire protection zones in addition to the area required for the building structure. The combination of requirements in addition to the project facilities requirements do not allow a “no impacts” alternative that satisfies the project’s purpose and need.

The proposed alternative minimizes the impacts to wetlands by reconfiguring and rescaling the proposed data center building. The preferred alternative minimizes impacts to site wetlands and meets the needs of the proposed development. The Applicant would follow conditions set forth by the Agency and USACE.

### **Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities**

On March 22, 2018, an IDNR EcoCAT consultation was initiated, Project #1809025, and the Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves near the project location. The consultation was immediately terminated.

Based on a June 3, 2016 review of the U.S. Fish and Wildlife Service (USFWS) technical assistance website, sensitive (federally threatened or endangered) plant or animal species habitat are not located on or adjacent to the project area.

### **Agency Conclusion**

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time this assessment was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the local community through economic development and job creation. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.