



September 4, 2008

Dan Kramer  
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**RE: REVIEW OF WILLOW RUN RECYCLING AND DISPOSAL FACILITY APPLICATION,  
CRITERION NO. 3 (0821)**

Dear Dan:

At your request, The Lannert Group has undertaken a review of the above captioned report. Our review has focused on the first part of Criterion 3, which states that a new pollution control facility "is to be located so as to minimize incompatibility with the character of the surrounding area".

Inherent in this criterion is the assumption that some incompatibility exists and therefore must be minimized. In order to address the criteria, two levels of investigation are necessary for evaluation. The first consideration deals with the location of the proposed new pollution control facility within the context of the "character of the surrounding area". The character of the surrounding area should be focused on the existing conditions which impact the facility at the time of the proposed siting. The Rolf C. Campbell & Associates, Inc. (RCCA) Criterion 3 report skims over the surrounding uses and focuses in great detail on the adjacent zoning and the future land use consideration of the Land Resource Management Plan (LRMP). While these planning features play a roll, they do not constitute the required analysis under the criteria. Specifically, consideration of the zoning on or around the subject site is excluded from analysis for determining the character of the surrounding uses. Therefore, as described on the attached document, the analysis is incomplete and has not evaluated the Criterion 3 parameters.

The landscape and screening portion of the report has also been reviewed. The Lannert Group's comments are based upon the report prepared by Rolf C. Campbell, Inc. (RCCA) and the Land Use/Landscaping and Screening Recommendations prepared by Conservation Design Forum, Inc. (CDF), and highlight the inconsistencies and lack of coordination between them. It is difficult to determine which report will take precedence or which recommendations will govern.

Thank you for allowing us the opportunity to assist you in the evaluations of Criterion 3.

Best Regards,

A handwritten signature in black ink that reads "J. Christopher Lannert". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

J. Christopher Lannert

JCL/ss

## **IMMEDIATE AREA**

The Aerial Photograph referenced in the text of the report was not used for any analysis of existing uses. The discussion of the three study areas begins with the Immediate Area and the comment that the Subject Site is zoned A-1 and no real property is zoned residential within 1,000 feet. Subsequently, only a few photographs, one of a transmission tower, another of a farmstead, are the basis of some general concepts on land use. The concluding sentence states that the pattern of zoning for the three study areas is shown on Figure 5 (Zoning Aerial Photograph Exhibit).

## **SURROUNDING AREA**

The Surrounding Area description states “the surrounding area is predominantly made up of property zoned in the A-1 (Agricultural District) in Kendall County and A (Agriculture District) in Grundy County”. Some of the text explains typical agriculture areas are largely developed as agricultural uses for the growth of the crops. No computations are provided that confirm what the zoning reflects. In order to address surrounding character, only a single statement in a summary references a percentage without any supporting documentation. Another statement suggests that, “there is a concentration of non-agriculture uses including a cell tower and gas and electric utilities near the Subject Site”, without defining how large the concentration is related to the surrounding area.

## **BROADER AREA**

The Broader Area description again recalls the photograph description shown on Figure 4 and the Zoning Aerial on Figure 5. Only parcels with zoning classifications are located or described. The concluding statement of the first paragraph states, “the overall zoning pattern is generally consistent with the future land use plans for the area”. Neither the zoning pattern nor the future land use patterns address Criterion 3, that requires the proposed site “minimize incompatibility with the character of the surrounding area”. The analysis contained in the Broader Area study appears to justify the landfill in the context of the future land use plans without reaching a conclusion pertaining to the character of the surrounding area supported by the required land use analysis.

The continuing discussion and evaluation of the previous 1994 Resource Plan (Figure 6) and the recent 2006 Resource Plan Update (Figure 7) indicates, as stated in the text, a “much greater diversity” within the broader area which is evolving over time.

These possible/planned conceptual uses provide insight for compatibility in the future, but do not address the “character of the surrounding area” today. Additionally, as shown on Figure 8 (Grundy County Land Use Plan Map), future proposed development is contemplated north of Interstate 80 and along Route 47. The proposed land use plans for the area, as described, anticipate the future. These plans should not be used as the justification for describing the character of the surrounding area in the present, under the locational aspects of Criterion 3. The appropriate use of the future land use plans deal with the second aspect of Criterion 3; minimizing the impact on the character of the surrounding area into the future.

## **LAND RESOURCE MANAGEMENT PLANS/COMPREHENSIVE PLANS**

The RCCA report also provides, in great detail, an analysis of the Land Resource Management Plan. The recent growth of Kendall County and the County's planning priorities, have necessitated more frequent updates. Each update, as listed on Page 19, describes how each of the updates has become more specific; more mixed-uses have been incorporated while encouraging the protection of farming land uses and natural resource protection. The evolution of the plan also recognizes the growth of municipal annexations and seeks to direct growth to existing settlement areas. What is missing from the analysis, dealing with the Broader Area (within a 1 to 5 mile study area), is the acknowledgement of the other corporate boundary (other than Morris) which surrounds the site within the study area. Channahon's boundary competes with Morris to the south of Sherrill Road and was not addressed. The 2005 Comprehensive Plan Land Use Map for the Village of Minooka (available online), projects land uses west of Brisbin Road. Highway commercial uses occur south of Sherrill Road and west of Brisbin Road; south of the proposed site. Traditional neighborhood uses are proposed west of Brisbin Road, north and south of Whitewillow Road, approximately one mile in each direction. These future land uses have not been addressed in the text or contemplated in the landscape plans. In order to minimize the impact of the character of the surrounding area, recognition of this possible future use should be highlighted from a contextual viewpoint and projected to be minimized in the future through the landscape plans. The current plans do neither. Suggestions to minimize the potential future conflict are discussed in The Lannert Group's, Landscaping and Screening review which follows.

## **LANDSCAPING AND SCREENING**

The Lannert Group has reviewed the report prepared by Rolf C. Campbell & Associates, Inc. (RCCA) as well as the Land Use/Landscaping and Screening Recommendations prepared by Conservation Design Forum, Inc. (CDF). Following are The Lannert Group's opinions, review comments and recommendations related to the landscape, screening and buffering of the facility.

The RCCA report mentions "clustering" of native trees and hedgerows several times throughout the report. In our experience, clustering refers to a naturalized formation of plant material which is representative of a naturally occurring plant mass. It is our opinion that plant material used in a cluster is typically grouped or massed using a minimum of three (3) trees or shrubs. Even larger clusters of trees (5, 7, 10, etc.) is appropriate for the scale of this site. The plant material placement in a cluster is random. In the RCCA report and plans the plant material is not random but placed in very rigid, uniform rows. Clusters are typically used in screening and buffering techniques because they not only look more natural within a rural setting but they establish plant material layers which visually screen and buffer unwanted views better and more appropriately than single rows of plant material. Without the layering effect, views can penetrate through the screen. Figure 9 of the RCCA report illustrates what the report calls clustering. In our opinion, the figure shows a very straight and rigid tree layout which does not represent clustering. It even goes to the point of labeling the trees along Whitewillow Road as a "row of native trees" which is inconsistent with the term "clustering".

There is inconsistency between the written text and the plan along Whitewillow Road. The report text states that hedgerow plantings will occur along the "entire" White Willow Road frontage. This is inconsistent with the information shown on Figure 9 of the report. As shown on this plan, the hedgerow only occurs along that portion of Whitewillow Road that is adjacent to

the actual landfill and at that the hedgerow is approximately 2/3rds of the actual landfill frontage. There is no hedgerow shown along the eastern portion of the subject site or the western portion of the site; both areas that front White Willow Road. Using the bar scale on Figure 9, of the approximate 8,000 linear feet of frontage, only 2,500 linear feet is actually screened by a hedgerow. Likewise, there is only one cross section shown transecting Whitewillow Road. Therefore, it is assumed that the hedgerow as well as the 8 foot minimum screening berm is to continue along the entire frontage, which is confirmed by the text.

Hedgerows are used for the establishment of wind breaks and property demarcation boundaries between parcel ownership, typically in a rural setting. Hedgerows typically are planted using a mix of medium sized, multi stemmed trees and shrubs that help diffuse the wind. The hedgerows shown in this report are extremely general in nature and tend to leave a lot to the imagination as to what is actually planted. The hedgerows are shown as a yellowish-green symbol and have no reference as to the quantity or size of plant material located within the symbol. A detailed landscape plan should be completed calling out individual tree species and sizes so that a determination can be made as to whether the hedgerow is actually functioning as a hedgerow or merely a nice label on the plan. The report appendix shows a list of plant material that can presumably be used on the subject site but doesn't show enough detail to know what is being suggested for the plant material used in the hedgerows. One can assume that the ornamental tree list along with the deciduous shrub list shown in the RCCA report is the material that is being suggested for use within the hedgerows, but if one reviews the CDF report and the hedgerow list they show on Figure 8, it is extremely inconsistent with the list shown in the RCCA report. The CDF report addresses hedgerow trees only with no mention of shrub material, the RCCA report list shrubs but doesn't mention in either the text or figures where the shrubs are to be planted.

The RCCA report states that "steps to preserve existing trees in the right-of-way" are being taken but in reviewing the report and site photographs there are no existing trees shown within the Whitewillow Road right of way. Furthermore, there are no steps listed on how these trees are to be preserved. In our opinion, a detailed site inspection and site analysis, locating the existing plant material, should be undertaken as one of the first steps in preparing the report.

Figure 10 of the RCCA report shows a graphic landscape enlargement plan along Whitewillow Road. The plan enlargement "A" spans approximately 960 linear feet along the road frontage. Within this distance there is one, only one, native evergreen tree show within the entire span. First of all, this is inconsistent with Photo A, shown on Figure 12; which shows at least two evergreen trees. In our opinion, a buffer screening that only shows one evergreen tree in nearly 1,000 feet is not an adequate buffer screen. The second point is that the plan enlargement on Figure 10 labels the evergreen as a native tree specie. There are two native evergreen species listed in the appendix, Eastern White Pine (*Pinus strobus*) and American Arborvitae (*Thuja occidentalis*), neither of which we would consider a suitable evergreen screen in the context of the subject site location. Eastern White Pine is susceptible to wind damage, snow and ice and needs to be established in a more protected setting. The American Arborvitae is a slow growing upright evergreen that is also susceptible to strong winds, snow and ice damage as well as needing considerable soil moisture which will not be the case located on a screening berm. It is our opinion that using other non-native evergreen species such as the Norway Spruce or Colorado Blue Spruce, is more appropriate even though the plan states that the evergreens will be native. We are to assume that since these two tree species are listed in the Appendix that it is the intent to use these in place of native species; however, that is not clarified.

In our opinion, the proposed landscape hedgerow and 8 foot screening berm should be continued along the eastern property boundary adjacent to Brisbin Road. This boundary is adjacent to what is shown as a traditional neighborhood sector on the Minooka Land Use Plan. This designation contemplates a residential component as part of the traditional neighborhood therefore, a screening berm and planting is necessary to screen the potential future uses.

On page 26 of the RCCA report it states that there will be a hedgerow and prairie restoration area covering more than “1,200 linear feet, between the landfill footprint and the western boundary of the Subject Site”. We don’t understand the reference to 1,200 linear feet when the report is referring to a prairie restoration area. It would be more appropriate to refer to the prairie area as restoration acreage. Additionally, on this same page of the report it mentions an existing farmstead with a row of trees running parallel to Whitewillow Road that are to be preserved. These trees were missed or not shown on the graphic plan representation of the existing trees to be preserved, which goes back to our comment of what measures are being used to protect the existing trees.

Figure 9 shows a character image of a red barn and split rail fence found on the front cover of the 2006 Kendall County Resource Plan. In our opinion, this is the character of buildings that should be replicated on the Subject Site to help foster the intent of the overall prairie and rural concept. No where is it mentioned in the report as to what the buildings will look like but it is our suggestion to replicate this rural architecture within the maintenance buildings and scale house while maintaining sustainable green architectural practices throughout.

Page 28 of the RCCA report lists the installed height as well as the mature height of the proposed plant material. There is no mention of the height for the evergreen tree species which goes back to our comment that there really is not much emphasis placed on providing any type of evergreen screen along Whitewillow Road. Additionally, if it is assumed that shrubs will be planted within the hedgerows, the size of shrub at 18 to 36” will be overshadowed by the height of the prairie grasses. As shown in Figure 3 of the CDF report, many of the prairie grasses reach a mature height of 6 to 7 feet. In our experience this height of prairie grass is too tall for the actual landfill. Our suggestion would be to plant the final landfill cover with a low-profile prairie seed mix. As depicted on the typical cross section, the prairie grasses will be planted within the hedgerow and will be too tall adjacent to shrubs and other ornamental trees. In our opinion, there should be a clear demarcation between the screening and buffer plantings and where the prairie grasses begin so there is no competition between the two.

The appendix in the RCCA report shows four (4) generic native grass and forb plant material lists including; Emergent/Wet Meadow, Mesic Prairie, Upland Prairie and Dry Mesic Prairie. It is unclear, through lack of detail, if this material is meant to be seeded , plugged or a combination of both. It is also unclear as to the seed application rates and/or plant spacing. In most cases, establishing prairie and wetland areas is a difficult undertaking and is more a science than simply listing plants that may work in a given situation. It is our experience that there needs to be a combination of seeding and plugging occurring within wetland and prairie areas to establish an acceptable amount of plant coverage and to neutralize invasive weed species. The plans should detail if areas are to be seeded and/or plugged and at what rates and spacing.

In referencing the CDF report there is only one plant list that is consistent with the RCCA report and that is the Mesic Prairie list. Without additional detail, one can assume that since there is no mention of the other plant material that only the Mesic Prairie will be used for the

establishment of the prairie area. In our opinion, there needs to be a higher level of detail added to the report addressing where the remaining emergent/wet meadow, upland prairie and dry prairie species are located within the Subject Site. If they will not be used then they should be deleted from the report. Additionally, the report does not address how the edges of the storm water basins are to be naturalized and protected from erosion. Is one to assume that the emergent/wet meadow plant material will occur in these areas?

The term “high performance practice”, used in the CDF report, is somewhat confusing as to how this term relates to the advancement of landfill design and construction. The current practice of landfill design and construction has been used for decades. If high performance relates to issues relating to the landscape including the application of green or sustainable practices the whole notion of new, innovative sustainable practices has also been used for years as evidenced through The Lannert Group’s planning and design of Prairie Crossing (circa. 1993) as one of the first sustainable communities in the country. Groundwater hydrology, native landscape and water resource management were all strategies employed at Prairie Crossing.

Figure 2, Surface Water Management System Overlay, as shown in the CDF report is inconsistent with the plan shown in Figure 9, Landscape Plan, of the RCCA report. The areas of conflict include the landscape buffer along Whitewillow Road and along the western property boundary. The plant material placement does not match along Whitewillow Road and there is no existing hedgerow depicted along this western boundary as shown in the RCCA report.

In addition, this same CDF plan describes a broad, flat bottomed vegetated swale running parallel across the facility access drive. We are assuming from the scale of this drawing and Figure 10, which describes the same type of swale, that the swale width would be approximately 50’ or greater. The RCCA plan shows these swales as a typical v-bottomed engineered ditch with no regard to a “wide flat-bottomed swale”. Additionally, the CDF plan describes two areas where a rain garden and filter berm are located. The function of a rain garden and filter berm is to slow rain water runoff through a series of meandering berms and disperse the water into a shallow basin (rain garden) where the runoff will be filtered and plant material will use the water through trans-evaporation before entering the Walley Run ditch. We realize that the plan described in the CDF report is an overlay, however, the engineer’s grading plan, which was used for the RCCA plan base should accommodate these features in the site grading, otherwise they will be overlooked. Instead of meandering flat bottomed swales, the plans show straight, v-shaped ditches discharging directly into the Walley Run ditch. The southern most rain garden and filter berm as shown on the CDF plan is not shown at all on the RCCA plan. In our opinion, the two plans are in conflict on this issue. Lastly, there is no scale house or administrative office shown anywhere within the entrance plan detail on either plan. This is inconsistent with all other landfill site entrances. The CDF plan graphically shows a building that is actually shown as a parking area on the RCCA plan. Once again, plan inconsistency. It is our opinion that the RCCA plan, which will govern construction, is correct even though their plan does not show any scale house or administrative office.

No where in either report is the final cover for the landfill addressed. As stated in the CDF report, root systems for prairie grasses can reach or exceed 10 to 15 feet. How will this be handled as to not penetrate the landfill membrane? Additionally, the report describes annual controlled burning as a maintenance tool for establishing the prairie. How will this be handled in and around the methane gas extraction wells?

The report includes a list of prairie grasses and forbs that successfully germinate from seed 80% of the time in an initial 1-4 year seeding installation. Typically, prairies are slow to germinate and establish. Neither report addresses temporary cover crops or erosion measures that would be in place during the establishment period, which as stated in the report can be more than 4 years.

The report goes into a very detailed, technical explanation of Mean C values (coefficient of conservatism) of which the typical lay person will not understand or care anything about. The bottom line is the higher C value rating, on a scale of 0 to 10, the higher the quality of plant material within a given area. Does the inclusion of this quality standard recommendation obligate Waste Management to hire an outside expert to conduct 4 years of annual transect monitoring and forensics within the prairie areas and at the end of 4 years do an assessment to check if the prairie is on an upward trajectory toward a Mean C value as high as 4.5? If the prairie is not on a positive swing then corrective action should be taken. In our opinion this is a sound stewardship practice that the owner should adopt as part of the plan of operations.

The CDF report states that mimicking and expanding a layered hedgerow planting along Whitewillow Road will better blend the site into the surrounding rural landscape. As stated previously, the RCCA report mentions nothing about plant material layering within the hedgerows and goes on to show and label a single row of trees, which is inconsistent with naturalized, clustering of plant material. It is not clear as to which direction is part of the application commitment.

Figure 7 of the CDF report describes a “long view across restored prairie” from Whitewillow Road looking in a southeasterly direction. This is in direct conflict with the RCCA report and cross section describing a continuous 8 foot minimum screening berm and “clustering of plant material” along the entire frontage of Whitewillow Road. The berm and planting as described in the RCCA report would block this view into the site. Additionally, Figure 7 describes a hedgerow along with western property boundary. It is unclear on this report if this is an existing or proposed hedgerow. In any case, this is in conflict with Figure 2 of the CDF report where no hedgerow is shown. Lastly, Figure 7, although very loose in nature, labels *Pinus Strobus* (Eastern White Pine) within the drainage swale leading into Walley Run ditch. This pine could not survive in a wet condition.

Figure 8, Landscape Buffer between Whitewillow Road and the Landfill Footprint, is inconsistent with the same plan shown in the RCCA report. Plant material quantities are different and there is little explanation as to what is included within the hedgerows. This plan describes the tree and shrub species within the hedgerow but gives no information as to quantities, size or specific location. Without any description of plant material size or numbers, no certainty is committed.

Figure 9, Landscape Buffer on Whitewillow Road East of the Landfill Footprint, describes “long views to pond” from Whitewillow Road looking in a southerly direction. This is in direct conflict with the RCCA report and cross section describing a continuous 8 foot minimum screening berm and “clustering of plant material” along the entire frontage of Whitewillow Road.

The report goes on to talk about green site development practices which are all good and should be achievable in the context of the overall site development. Porous paving, green architecture, windmill/solar panels and interpretive signage are all good in principle and should be part of the overall plan. The report talks about these principles but no where are they committed to. It describes that the rainwater around the ticket/administrative office,

maintenance facility and gas recovery facility be treated with a combination of green roofs, rain gardens and vegetated swales. No where on the plan is there a detail showing these practices or even at a minimum, text describing where these principles will be located. In our opinion, if these principles are presented as part of the Criterion 3 evaluation, they should be committed to now and added to the overall engineering plans as part of the approval process.

Figure 11 of the CDF report shows images depicting green roof and porous pavement technology. The photos show a very detailed image of an extensive green roof planting including prickly pear cactus, which in the context of Kendall County is not indigenous and raises a question about the validity of the report and which parts are extraneous and which are commitments.

Figure 13 of the CDF report shows a design detail for the East Sedimentation Basin which is different than the one shown in the RCCA report. The CDF layout clearly shows a gravel filter berm bisecting the basin in a north/south direction which is not shown in the RCCA report. We can only assume that this berm is to filter water from one side of the basin to the next. There is no other detail given for this berm nor is it shown on the engineering base. One would think that this is detailed in the section call outs shown on the plan, however, nowhere are sections A-A1, B-B1 and C-C1 addressed or shown graphically. Additionally, the plan calls out for a wetland shelf around the perimeter of the basin. A wetland shelf is a broad shelf, usually 10 to 20 feet in width or greater varying in water depths from 0" to 18" or greater. Since there are no details or sections given, it is unclear if the engineering base has made provisions for the shelves. To add plant shelves after the fact can not be accomplished. Also, there is no detail as to what is proposed for the wetland plantings, goose protection, and maintenance and monitoring. It is our opinion that wetland shelves are a good, sound sustainable practice along with naturalized basin edges and should be incorporated into all the basins on the Subject Site. It is not clear which landscape report governs or which commitment rules.

Lastly, the CDF report addresses an Alternate Site Design solution for the entrance almost as if the alternate design has more benefits than the proposed layout. As stated, the building placement showcases other sustainable design measures, there is a significantly larger contiguous area of restored prairie which is not bisected by the entrance drive and the ticket/administrative office is more effectively blended into the agricultural landscape. This begs the question as to why this wasn't considered as the primary entrance layout if its design better minimizes the impact on the character of the surrounding area.

## **SUMMARY OF RECOMMENDATIONS**

- Since there are inconsistencies between the RCCA and CDF landscape reports it is difficult to determine which report will take precedence or which recommendations will govern.
- Added detail addressing plant material species, quantities, size and location within the hedgerow areas and overall plan is recommended.
- Existing trees that are to be protected and preserved are not clearly described, nor is there any statement or detail of how these trees are to be protected.
- Continuation of the 8 foot screening berm and hedgerow planting along Brisbin Road, located adjacent to a future traditional neighborhood area, is recommended.
- All of the proposed Subject Site buildings should reflect the rural architectural character of Kendall County as suggested in the image shown in the RCCA report.
- Clarification on the landfill cover is recommended.

- There are several plant material lists shown in the RCCA appendix that are not shown on the plans or described in the text. These should be addressed.
- All stormwater retention basins should be planted with naturalized edges.
- All of the sustainable, “green” features shown in the CDF report are consistent with sound environmental practices and should be incorporated into the RCCA report and engineering base plan.
- Temporary cover seed mixes and erosion control measures should be addressed.
- Annual monitoring, maintenance and stewardship of all of the naturalized areas should be established.
- If the alternate Site Design solution is better, which according to the CDF report it is, then it should be the primary design.

### **EXECUTIVE SUMMARY**

The Lannert Group has performed a thorough review of the Land Use Analysis report prepared by Rolf C. Campbell & Associates, Inc. (June, 2008) and the Land Use/Landscaping and Screening Recommendations report prepared by Conservation Design Forum (June, 2008) as submitted for the Willow Run Recycling and Disposal Facility. While a number of positive recommendations have been offered, we strongly feel with the inconsistencies and non-commitment found within the reports, the responsibility of the Petitioner to satisfy Criterion 3 has not been met.