

Environmental Advisory Board

Dayton, Ohio



October 11, 2019

Office of City Manager and City Commission
101 West 3rd Street, Dayton, OH 45402

Subject: Environmental Advisory Board position on the Paul Knoop Prairie property development

Dear City Manager and City Commissioners:

The Environmental Advisory Board (Board) reviewed information regarding the potential industrial/commercial development of the Paul Knoop, Jr. Prairie (Prairie) this summer. We thank the Counsel for the Dayton International Airport (Airport) for providing the requested documents and the Aullwood Audubon and Counsel for Friends of Aullwood for two presentations and related documents. Although the Airport was unable to present a Prairie development proposal to the Board this summer, the Board asks the Airport to provide presentations on any future development proposals as this will allow the Board to offer well-reasoned recommendations to the City on Prairie property development.

Based on information provided to the Board during the period of June 2019 through August 2019, as well as insights brought forth by knowledgeable Board members, the Board recommends that the Prairie not be developed for industrial/commercial land use purposes. Specific findings of the Board include:

- Hydraulic connectivity of the Prairie groundwater and surface water to the adjacent, downstream Aullwood Audubon and Aullwood Garden MetroPark suggests the need to assess impacts of any Prairie development on adjacent properties.
 - About 30% of Aullwood's surface water flows from the Prairie.
 - The environmental inventory provided to the Board does not include impacts of development on adjacent properties.
- Loss of established prairie will impact habitat of high-value plants, insects and bird populations. This is especially concerning with recent reports of major declines in bird populations in the region.
- There is insufficient information to demonstrate how the Prairie property development will align with the current Airport Sustainability Plan.
- The process of property selection is unclear and does not appear to assess other viable properties that could support Airport and regional economic growth. The selection process should include, if it does not already, a category that weighs the environmental impact potential that development may have on the property and surrounding area.

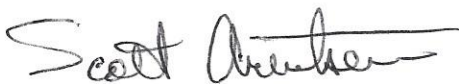
We submit to the City Manager and the City Commission that natural areas like the Prairie should be viewed as high-value commodities that promote sustainable regional health and wellbeing for its citizens and the environment. Although the Board supports the City's goal of sustainable economic growth in the region, the Board strongly recommends against development of the Prairie property for commercial/industrial use.

The Board understands that the City is continuing its search for a buyer to develop the property for commercial/industrial use as part of a larger plan regarding development around the Airport, in support of economic growth. If the City weighs the recommendation presented in this letter along with other community input and still decides to proceed with commercial/industrial development, then it is the Board's recommendation that the City require the developer to design the land use to:


- Maintain groundwater-fed stream conditions to protect cold-water habitat downstream
- Maximize preservation of prairie land for:
 - water conservation,
 - carbon reduction,
 - nature diversity, and
 - threatened/endangered species protection
- Institute and maintain the highest standards of environmental sustainability regarding:
 - pre- and post-development erosion controls, and
 - stormwater treatment, including maximizing green/open spaces and minimizing area of impervious surfaces.

The Board appreciates the challenging decisions that face the City in its efforts to balance economic growth and environmental protection. We thank you for your careful consideration of this subject.

Sincerely,



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