

October 29, 2021

Mr. Ben Weinerman
Pride One Construction
2211 Medina Road, Suite 100
Medina, OH 44256

Dear Ben,

Subject: ORAM Summary Letter
 Jacoby Road Development
 Copley Township, Summit County, Ohio
 CEC Project 310-902

Civil & Environmental Consultants, Inc. (CEC) is pleased to provide this summary of preliminary wetland ORAM scores on the approximately 63-acre Site located south of Spring Garden Waldorf School, on Jacoby Road in Copley Township, Summit County, Ohio (the Site). The Site is further identified on the Summit County Auditors website as parcel numbers 1501735 and 1501734.

1.0 BACKGROUND

In June and July 2021, CEC biologists conducted a wetland and stream delineation of the 63-acre Site and submitted a Preliminary Jurisdictional Waters Determination (PJWD) Report to the U.S. Army Corps of Engineers (USACE) requesting verification for the surface water features identified on Site. On September 20, 2021, a Preliminary Jurisdictional Determination (PJD) Letter for the Site was issued by the USACE (LRH-2021-662-TUS) providing verification for the stream features (Streams 1 through 7) and wetlands (Wetlands A through F) identified on the Site.

Delineated wetlands were evaluated using the Ohio EPA's *Ohio Rapid Assessment Method for Wetlands v. 5.0 User's Manual and Scoring Forms* (ORAM) (Mack, 2001). A preliminary wetland score was determined based on interpretation of ORAM results in accordance with narrative criteria in OAC 3745-1-54(C) and guidance in the *Ohio EPA's ORAM v. 5.0 Quantitative Score Calibration* (Mack, 2000). ORAM wetland scores are based on six primary metrics, including wetland size, upland buffers and surrounding land use, hydrological connectivity, habitat alteration and disturbances, special wetland qualities, and physical characteristics (plant communities, interspersions, micro topography). Based on these metrics, wetlands can score between 1-29.9 (Category 1), 30 – 34.9 (Category 1 or 2 Grey Zone), 35-59.9 (Category 2), 60-64.9 (Category 2 or 3 Grey Zone) and 65+ (Category 3).

Ohio Administrative Code Rule 3745-1-54(C)(2) defines Category 2 wetlands as wetlands that support moderate wildlife habitat or hydrological functions and are mostly comprised of native species (moderate levels of diversity). All wetlands identified on the Site were scored as Category 2 primarily due to their minimal hydrological functionality, observed moderate levels of invasive species, and a lack of significant wetland qualities such as superior habitat, threatened/endangered species, bog or fen habitats, coastal wetlands, or mature forested wetlands. A summary of the verified wetlands and their corresponding ORAM scores/categories is provided in Table 1 below.

TABLE 1: WETLAND FEATURES SUMMARY

Wetland ID	Cowardin Classification¹	Coordinates (Latitude, Longitude)	Preliminary ORAM Score	Preliminary ORAM Category²	Delineated Area³ (Acres)
Wetland A	PFO	41.08212, -81.61088	39	2	17.31
Wetland B	PFO	41.08257, -81.61770	48	2	0.02
Wetland C	PSS	41.08289, -81.61742	45	2	0.32
Wetland D	PSS	41.08220, -81.61617	50	2	0.26
Wetland E	PSS	41.08157, -81.61715	42	2	0.37
Wetland F	PEM	41.08136, -81.61569	49	2	0.99
Total Wetland Area (Acres) within the Site					19.27

¹As determined by the USACE's Waters Upload Sheet

²Scoring for ORAM v 5.0: Category 1 = 0 - 29.9; Category 1 or 2 Gray Zone = 30 - 34.9; Category Modified 2 = 35 - 44.9; Category 2 = 45 - 59.9; Category 2 or 3 = 60 - 64.9; Category 3 = 65 - 100. ORAM v. 5.0 Quantitative Score Calibration, Last Revised: August 15, 2000.
http://epa.ohio.gov/portals/35/401/oram50sc_s.pdf

³Acreage within the Site

On behalf of Pride One, CEC is preparing a pre-construction notification (PCN) which will be submitted to USACE to request authorization for impacts to waters of the U.S. under Clean Water Act Section 404 Nationwide Permit 29. During review of the PCN, USACE will coordinate with Ohio EPA Division of Surface Water to request verification of the ORAM results presented above and in the PJWD report.

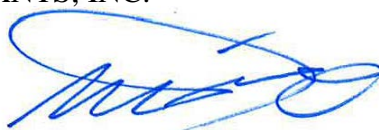
If you have questions, please contact Nick D'Eramo at (614) 634-0190 and nderamo@cecinc.com.

Respectfully submitted,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Alex Colosimo
Staff Scientist



Nick D'Eramo
Project Manager