



Indiana Department of Environmental Management

Office of Water Quality

Wetlands Section

Publication Date:
August 12, 2025

IDEM ID Number:
2025-556-2-EJW-IWIP

Closing Date:
September 11, 2025

Corps of Engineers ID Number:
Not Applicable

PUBLIC NOTICE

To all interested parties: This letter shall serve as a formal notice of the receipt of an application for a **State Isolated Wetland Individual Permit** by the Indiana Department of Environmental Management (IDEM). The purpose of the notice is to inform the public of active applications submitted for permits required under IC 13-18-22 and to solicit comments and information on any impacts to water quality related to the proposed project. IDEM will evaluate whether the project complies with Indiana's water quality standards as set forth at 327 IAC 2 and all applicable provisions of IC 13-18-22.

- | | | | |
|----------------------|---|------------------|--|
| 1. Applicant: | Marc Stern
Hatchworks LLC
7510 Zodiac Way
Fort Wayne, IN 46816 | 2. Agent: | Heather Dardinger
EMH&T
5500 New Albany Road
Columbus, OH 43054 |
|----------------------|---|------------------|--|
- 3. Project location:** 6015 Adams Center Road, Fort Wayne, IN 46816
Approximately 0.55 miles Northeast of E Paulding Road and Adams Center Road intersection in Fort Wayne.
- 4. Affected waterbody:** 1.65 acres of Isolated, Unforested Class 2 Wetland 1 and 0.79 acres of Isolated, Forested Class 2 Wetland 2.
- 5. Project Description:** The applicant proposes filling 1.65 acres of wetland 1 and 0.79 acres of wetland 2 with clean soil fill derived on site to continue developing the Project Zodiac data center campus. The applicant proposes Phase 2 of Project Zodiac, constructing five (5) additional data center buildings and associated utilities infrastructure, internal drives, and stormwater facilities. The first phase of construction was authorized under Isolated Wetland Individual Permit 2024-359-2-EJW-IWIP. To mitigate for wetland impacts, the applicant proposes purchasing 2.48 acres of unforested wetland credit and 1.58 acres of forested wetland credit from The Openings Wetland Mitigation Bank. If The Openings Wetland Mitigation Bank does not have the sufficient amount, then the remaining mitigation may be purchased from the Maumee Service Area of IDNR's In-Lieu Fee Program.

Comment period: Any person or entity who wishes to submit comments or information relevant to the aforementioned project may do so by the closing date noted above. Only comments or information related to water quality or potential impacts of the project on water quality can be considered by IDEM in the state isolated wetland permit review process.

Public Hearing: Any person may submit a written request that a public hearing be held to consider issues related to water quality in connection with the project detailed in this notice. The request for a hearing should be submitted within the comment period to be considered timely. The request should also state the reason for the public hearing as specifically as possible to assist IDEM in determining whether a public hearing is warranted.

Questions? Additional information may be obtained from Evan White, Project Manager, at EVWhite@IDEM.IN.Gov or 317-671-6698. Please address all correspondence to the project manager and reference the IDEM project identification number listed on this notice. Indicate if you wish to receive a copy of IDEM's final decision. Written comments and inquiries may be forwarded to -

Indiana Department of Environmental Management
100 North Senate Avenue
MC65-42 WQS IGCN 1255

Indianapolis, Indiana 46204-2251
FAX: 317/232-8406



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

WATER OF THE STATE DETERMINATION

PROJECT NO.: 2025-75-2-EJW-WOSD

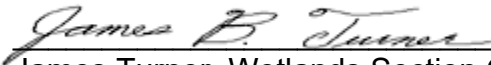
PROJECT NAME: Zodiac Phase 2

USACE ID: LRE-2023-00646-102-J24

AUTHORITY: 327 IAC 17-1-3(13), 327 IAC 17-1-3(17)

DATE OF ISSUANCE: April 23, 2025

DATE OF EXPIRATION: June 18, 2029

APPROVED: 
James Turner, Wetlands Section Chief
Surface Water and Operations
Office of Water Quality

RESPONSIBLE PARTIES: Marc Stern
Hatchworks LLC
7510 Zodiac Way
Fort Wayne, IN 46816

DELINEATOR(S): Eric Nagy
EMH&T
5500 New Albany Road
Columbus, OH 43054

AGENT(S): Heather Dardinger
EMH&T
5500 New Albany Road
Columbus, OH 43054

DELINEATION DATES: August 7, 2023
August 8, 2023
August 9, 2023
August 10, 2023
August 14, 2023
August 15, 2023
August 16, 2023

DATE REPORT RECEIVED: January 20, 2025

TRACT LOCATION: Approximately 0.58 miles Northeast of Adams Center Rd and E Paulding Rd intersection.
Latitude 41.03968, Longitude -85.05098
Allen County

The project tract is approximately 851 acres in size and is located approximately 0.70 miles Southeast from E Paulding Road and Adams Center Road intersection near Fort Wayne.

IDEM FIELD DATE: November 29, 2023

PROPOSED ACTIVITY: Construct a data center on approximately 851 acres of property with accompanying roads and utilities infrastructure.

CONCLUSIONS:

The Indiana Department of Environmental Management (IDEM) has reached the following conclusions about whether any Waters, as defined in 327 IAC 17-1-3(13), exist on the property. In accordance with 327 IAC 17-1-3(17) the department makes all isolated wetland determinations consistent with the Wetland Delineation Manual, Technical Report Y-87-1 of the United States Army Corps of Engineers.

SITE ID	ACRES	CLASS	FORESTED	EXEMPT	PERMIT NEEDED FOR PROPOSED ACTIVITY	AUTHORITY
Wetland 1 Forested	5.73	II	Yes	No	Yes	IC 13-18-22
Wetland 1 Cropped	1.65	II	No	No	Yes	IC 13-18-22
Wetland 2	0.79	II	Yes	No	Yes	IC 13-18-22

Wetland 3	0.02	II	Yes	Yes	No	IC 13-11-2- 74.5(a)(6)(B)
Wetland 4	0.01	II	Yes	Yes	No	IC 13-11-2- 74.5(a)(6)(B)
Wetland 5	0.40	II	No	Yes	No	IC 13-11-2- 74.5(a)(6)(B)
Wetland 6	0.20	I	No	Yes	No	IC 13-11-2- 74.5(a)(5)
Wetland 8	0.24	I	No	Yes	No	IC 13-11-2- 74.5(a)(5)
Wetland 9	0.13	I	No	Yes	No	IC 13-11-2- 74.5(a)(5)
Wetland 10	0.41	II	No	Yes	No	IC 13-11-2- 74.5(a)(6)(B)
Wetland 12	0.02	I	No	Yes	No	IC 13-11-2- 74.5(a)(5)
Wetland 13	0.05	I	No	Yes	No	IC 13-11-2- 74.5(a)(5)
Wetland 16	0.16	I	No	Yes	No	IC 13-11-2- 74.5(a)(5)

Wetland 17	0.04	I	No	Yes	No	IC 13-11-2-74.5(a)(5)
Wetland 18	0.02	I	No	Yes	No	IC 13-11-2-74.5(a)(5)
Wetland 19	0.12	I	No	Yes	No	IC 13-11-2-74.5(a)(5)
Wetland 20	0.07	I	No	Yes	No	IC 13-11-2-74.5(a)(5)
Wetland 22	0.04	I	No	Yes	No	IC 13-11-2-74.5(a)(5)
Wetland 23	0.32	II	Yes	No	Yes	IC 13-18-22
Wetland 24	0.14	II	Yes	No	Yes	IC 13-18-22
Wetland 25	0.01	I	No	Yes	No	IC 13-11-2-74.5(a)(5)
Wetland 26	0.07	II	Yes	No	Yes	IC 13-18-22
Wetland 27	0.03	II	Yes	No	Yes	IC 13-18-22

Wetland 29	0.41	II	Yes	No	Yes	IC 13-18-22
Wetland 30 Forested	0.50	II	Yes	No	Yes	IC 13-18-22
Wetland 30 Cropped	0.12	II	Yes	No	Yes	IC 13-18-22

COMMENTS:

Wetlands 6, 8, 9, 12, 13, 16, 17, 18, 19, 20, 22, and 25 are unforested, Class I wetlands that do not have moderate habitat or hydrology. Per IC 13-11-2-74.5(a)(5), Wetlands 6, 8, 9, 12, 13, 16, 17, 18, 19, 20, 22, and 25 are exempt from permitting.

Wetlands 1 Cropped and 30 Cropped are unforested, Class II wetlands that have moderate habitat or hydrology. Wetlands 1 Cropped and 30 Cropped are regulated wetlands.

Wetlands 1 Forested, 2, 23, 24, 26, 27, 29, and 30 Forested are forested, Class II wetlands that have moderate habitat or hydrology. Wetlands 1 Forested, 2, 23, 24, 26, 27, 29, and 30 Forested are regulated wetlands.

Wetlands 5 and 10 are unforested, Class II wetlands that have moderate habitat or hydrology. Per IC 13-11-2-74.5(a)(6)(B), Wetlands 5 and 10 are exempt from permitting.

Wetlands 3 and 4 are forested, Class II wetlands that have moderate habitat or hydrology. Per IC 13-11-2-74.5(a)(6)(B), Wetlands 3 and 4 are exempt from permitting.

Per IC 13-11-2-74.5(c)(2), the total acreage of Class II wetlands on a tract to which the exemption described in IC 13-11-2-74.5(a)(6)(B) may apply is limited to 60% of the cumulative acreage of all Class II exempt-eligible wetlands. There are **2.43 acres of Class II wetlands that are exempt-eligible under IC 13-11-2-74.5(a)(6)(B) within the subject area.**

Hatchworks LLC proposes to claim the Class II exemption on the following Class II isolated wetlands, totaling 0.84 acre: Wetlands 3, 4, 5 and 10. Further utilization of the

Class II exemption is deferred to future phases of permitting and site development on the Project Zodiac site.

The Indiana Code regulates some activities differently within isolated wetlands. This determination was made based on the activity as proposed in the materials submitted to IDEM. If the proposed activity changes, the determination above may no longer be accurate.

DISCLAIMER:

This determination is based upon the information provided in the above referenced delineation report and/or the above referenced field evaluation. This determination does not relieve the recipient from the responsibility of obtaining any permits or authorizations that may be required for this project or related activities from IDEM or any other agency or person. The project site and the associated construction may be subject to the Construction Stormwater General Permit (CSGP). The CSGP specifically addresses stormwater run-off and the pollutants associated with all land-disturbing activities of one acre or more. If applicable, permit coverage must be obtained prior to the initiation of land-disturbing activities. Please contact the IDEM Stormwater Program at Stormwat@idem.IN.gov or 317-233-1864 concerning obtaining permit coverage under the CSGP. You may also wish to contact the Indiana Department of Natural Resources at 317-232-4160, or toll free at 877-928-3755, concerning the possible requirement of a Natural Freshwater Lake or Construction in a Floodway Permit.

This determination does not:

- (1) authorize impacts or activities;
- (2) authorize any injury to persons or private property or invasion of other private rights, or any infringement of federal, state or local laws or regulations;
- (3) convey any property rights of any sort, or any exclusive privileges;
- (4) preempt any duty to obtain federal, state or local permits or authorizations required by law for the execution of the project or related activities; or
- (5) authorize changes in the plan design detailed in the application.

APPEALS PROCEDURES:

This decision may be appealed in accordance with IC 4-21.5, the Administrative Orders and Procedures Act. The steps that must be followed to qualify for review are:

1. You must petition for review in writing that states facts demonstrating that you are either the person to whom this decision is directed, a person who is

aggrieved or adversely affected by the decision, or a person entitled to review under any law.

2. You must file the petition for review with the Indiana Office of Administrative Law Proceedings (OALP) at the following address:

Office of Administrative Law Proceedings
100 North Senate Avenue
IGCN Room N802
Indianapolis, IN 46204

3. You must file the petition within eighteen (18) days of the mailing date of this decision. If the eighteenth day falls on a Saturday, Sunday, legal holiday, or other day that the OALP offices are closed during regular business hours, you may file the petition the next day that the OALP offices are open during regular business hours. The petition is deemed filed on the earliest of the following dates: the date it is personally delivered to OALP; the date that the envelope containing the petition is postmarked if it is mailed by United States mail; or, the date it is shown to have been deposited with a private carrier on the private carrier's receipt, if sent by private carrier.

Identifying the permit, decision, or other order for which you seek review by number, name of the responsible, location, or date of this notice will expedite review of the petition.

Note that if a petition for review is granted pursuant to IC 4-21.5-3-7, the petitioner will, and any other person may, obtain notice of any prehearing conferences, preliminary hearings, hearings, stays, and any orders disposing of the proceedings by requesting copies of such notices from OALP.

For additional information on filing a petition with OALP, visit their website at <https://www.in.gov/oalp/>

If you have any questions about this determination, contact Evan White by phone at 317-671-6698 or by e-mail at EVWhite@idem.in.gov.

cc: Heather Dardinger, EMH&T



**APPLICATION FOR AUTHORIZATION TO DISCHARGE DREDGED
OR FILL MATERIAL TO ISOLATED WETLANDS AND/OR
WATERS OF THE STATE**

State Form 51821 (R2 / 11-15)

Indiana Department of Environmental Management

- INSTRUCTIONS:** 1. Read the instruction sheet before filling out this form.
2. You must complete all applicable sections of this form

1. Applicant Information		2. Agent Information	
Name of Applicant Hatchworks LLC		Name of Agent EMH&T	
Mailing address (Street/ PO Box/ Rural Route, City, State, ZIP Code) 7510 Zodiac Way Fort Wayne, IN 46816		Mailing address (Street/ PO Box/ Rural Route, City, State, ZIP Code) 5500 New Albany Road Columbus, Ohio 43054	
Daytime Telephone Number 650-495-3224		Daytime Telephone Number 614-775-4523	
Fax Number		Fax Number	
E-mail address (optional) marcstern@google.com		E-mail address (optional) hdardinger@emht.com	
Contact person (required) Marc Stern, Site Facilities Manager		Contact person Heather Dardinger, Senior Environmental Scientist	
3. Project / Tract Location			
County Allen		Nearest city or town Fort Wayne	
U.S.G.S. Quadrangle map name (Topographic map) Fort Wayne East, Indiana		Project street address (if applicable) 6015 Adams Center Road, Fort Wayne, IN 46816	
Quarter	Section 22, 26, 27	Township 30 North	Range 13 East
Type of aquatic resource(s) to be impacted (Attach Worksheet One.) See attached worksheet.		Project name or title (if applicable) Project Zodiac Phase 2	
Other location descriptions or driving directions From Indianapolis, take I-69N toward Fort Wayne. Take exit 269A for I-469E. Follow I-469E for approximately 13 miles. Take exit 13 toward Marion Center Rd. Turn left onto Marion Center Rd. At the traffic circle, take the 2nd exit onto Adams Center Rd. The project site is located approximately 2 miles north at Adams Center Rd. and Paulding Rd.			
4. Project Purpose and Description (Use additional sheet(s) if required.)			
Has any construction been started? ☒ Yes ☐ No		Anticipated start date (month, day, year) Upon permit issuance	
If yes, how much work is completed? Initial phases of construction have been initiated under previously authorized IWIP (2024-359-2-EJW-A).			
Purpose of project and overview of activities The proposed project involves the second phase of construction of the Project Zodiac data center campus, providing an additional five data center buildings (DC02-06) and associated improvements. See attached permit application report.			

5. Avoidance, Minimization, and Mitigation Information: Applicants must answer all of the following questions

(Use additional sheet(s) if necessary - provide a detailed response to all applicable questions.)

A. For projects with Class II isolated wetlands –

1. Is there a reasonable alternative to the proposed activity?
See attached permit application report.

2. Is the proposed activity reasonably necessary or appropriate?
See attached permit application report.

B. For projects with Class III wetlands, adjacent wetlands, and/or streams, rivers, lakes or other water bodies –

1. Is there a practicable alternative to the proposed activity?
N/A

2. Have practicable and appropriate steps to minimize impacts to water resources been taken?
N/A

Describe all compensatory mitigation required for unavoidable impacts.

Purchase of wetland mitigation credit from the Openings Mitigation Bank and/or the IDNR In-Lieu Fee Mitigation Program. See attached permit application report.

6. Drawing / Plan Requirements (Applicants must provide the following.)

- a. Top/aerial/overhead views of the project site showing existing conditions and proposed construction.
- b. Cross sectional view of areas of fill or alterations to streams and other waters.
- c. North arrow, scale, property boundaries.
- d. Include wetland delineation boundary *(if applicable)*. Label all wetlands (jurisdictional, isolated and exempt) as I-1, I-2, I-3, etc. and the mitigation areas as M-1, M-2, etc.
- e. Location of all surface waters, including wetlands, erosion control measures, existing and proposed structures, fill and excavation locations, disposal area for excavated material, including quantities, and wetland mitigation site *(if applicable)*.
- f. Approximate water depths and bottom configurations *(if applicable)*.

7. Supplemental Application Materials (Applicants must provide the following.)

- a. A wetland delineation of all wetlands on the project site *(for projects with wetland impacts)*.
- b. At least three photographs of the project site. Indicate the photo locations on the project plans.
- c. If isolated wetlands are present, a letter from the Corps of Engineers verifying this statement.
- d. Wetland mitigation plan and monitoring report.
- e. Classification of all isolated wetlands on the tract *(if isolated wetlands are present onsite)*.
- f. Copies of all applicable local permits and/or resolutions pertaining to the project or tract.
- g. Tract history *(see instructions)*.

8. Additional information that MAY be required (IDEM will notify you if needed.)

- a. Erosion control and/or storm water management plans.
- b. Sediment analysis.
- c. Species surveys for fish, mussels, plants and threatened or endangered species.
- d. Stream habitat assessment.
- e. Any other information IDEM deems necessary to review the proposed project.

9. Permitting Requirements

a. Does this project require the issuance of a Department of the Army Section 404 Permit from the US Army Corps of Engineers? ☒ Yes ☐ No

If no, you do not need to answer Part b.

b. Have you applied for an Army Corps of Engineers Section 404 permit? ☒ Yes ☐ No

If yes, please supply the Corps of Engineers ID Number, the Corps of Engineers District, the project manager, and a copy of any correspondence with the Corps. **If no, contact** the Army Corps of Engineers regarding the possible need for a permit application.

Submitted NWP 39 on 3/25/2025 and 401 WQC on 4/25/2025 for Phase 2 permit area.

c. Have you applied for, received, or been denied a permit from the Department of Natural Resources for this project? ☐ Yes ☒ No

Please give the permit name, permit number, and date of application, issuance or denial.

d. Have you applied for, received, or been denied any other federal, state, or local permits, variances, licenses, or certifications for this project?

☒ Yes ☐ No

Please give the permit name, agency from which it was obtained, permit number, and date of issuance or denial.

See attached list.

10. Adjoining Property Owners and Addresses

List the names and addresses of landowners adjacent to the property on which your project is located and the names and addresses of other persons (or entities) potentially affected by your project. Use additional sheet(s) if required.

Name See attached sheet. Address (number and street) City State ZIP Code	Name Address (number and street) City State ZIP Code
Name Address (number and street) City State ZIP Code	Name Address (number and street) City State ZIP Code
Name Address (number and street) City State ZIP Code	Name Address (number and street) City State ZIP Code
Name Address (number and street) City State ZIP Code	Name Address (number and street) City State ZIP Code
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PROJECT ZODIAC
ADJOINING PROPERTY OWNERS AND ADDRESSES

PARCEL NO.	OWNER NAME	PROPERTY ADDRESS 1	CITY, ST ZIP	MAILING ADDRESS 1	CITY, ST ZIP
02-13-21-451-001.003-077	Board of Commissioners of the County of Allen	6227 E Paulding Rd	Fort Wayne, IN 46816	200 E Berry St Ste 410	Fort Wayne, IN 46802
02-13-21-451-002.000-077	Board of Commissioners of the County of Allen, c/o Allen Co Sheriffs Dep	5617 E Paulding Rd	Fort Wayne, IN 46816	715 S Calhoun St Rm 101	Fort Wayne, IN 46802
02-13-22-100-006.000-077	City of Fort Wayne, Dept of Redevelopment	Adams Center Rd	Fort Wayne, IN 46806	200 E Berry St Ste 320	Fort Wayne, IN 46802
02-13-22-200-002.000-077	City of Fort Wayne, Dept of Redevelopment	Seiler Rd	Fort Wayne, IN 46806	200 E Berry St Ste 320	Fort Wayne, IN 46802
02-13-22-300-001.001-077	Fedex National Ltl Inc	4901 Adams Center Rd	Fort Wayne, IN 46806	3336 East 32nd St. # 217	Tulsa, OK 74135
02-13-22-501-001.000-039	CSX Transportation Inc	Paulding Rd	Fort Wayne, IN 46806	500 Water St (J910)	Jacksonville, FL 32202
02-13-22-501-002.000-041	CSX Transportation Inc	Paulding Rd	Fort Wayne, IN 46806	4701 Cox Rd Ste 301	Glen Allen, VA 23060
02-13-26-300-003.000-039	Trabel Paul E & Geri M	Tillman Rd	Fort Wayne, IN 46816	6404 Hartzell Rd	Fort Wayne, IN 46816
02-13-27-301-001.000-077	Indiana Michigan Power Company	Adams Center Rd	Fort Wayne, IN 46816	PO Box 16428	Columbus, OH 43216
02-13-27-301-010.000-077					
02-13-28-200-010.000-039	Hansel James L & Christie L	5832 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-016.000-039	Alexander Mark A & Livia A	6022 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-016.001-039					
02-13-28-200-016.002-039	The 5 Sisters LLC	6076 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-019.000-039	Eisenacher Matthew A & Erica M	6118 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-020.000-039	Kolkman Michele M & Bruce W	6204 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-021.000-039	Yoder Roland J	6216 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-022.000-039	Krueger Nancy L	6226 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-023.000-039	Dye Michael Edward	6430 Adams Center Rd	Fort Wayne, IN 46816		
02-13-28-200-025.000-039					
02-13-28-200-029.000-039	Zurbuch Paul A	6524 Adams Center Rd	Fort Wayne, IN 46816		

SUMMARY OF PERMITS/APPROVALS

Primary Development Plan

- Agency: City of Fort Wayne
- Permit Approval: November 16, 2023
- Permit Number: REZ-2023-0052

Paulding Road Vacation

- Agency: City of Fort Wayne
- Permit Approval: December 01, 2023
- Recordation: January 10, 2024

County Surveyor Regulated Drain Vacation (Marhenke)

- Agency: Allen County Surveyor's Office
- Permit Approval: January 19, 2024
- Permit Number: Drainage Board File – 24-026 (Drain #13-23-300)

Secondary Development Plan

- Agency: City of Fort Wayne
- Permit Approval: January 22, 2024
- Permit Number: SDP-2024-001

County Surveyor Regulated Drain Encroachment (Adams Ditch)

- Agency: Allen County Surveyor's Office
- Permit Approval: January 25, 2024
- Permit Number: Drainage Board File – 24-025 (Drain #13-23-300)

Initial Mass Grading

- Agency: City of Fort Wayne
- Permit Approval: February 1, 2024 (Grading and Basin Outfalls Only)
- Permit Number: 2024-SWP-002

Notice of Intent (NOI)

- Agency: Indiana Department of Environmental Management (IDEM)
- Notice of Sufficiency Issued: February 13, 2024
- Permit Number: INRA13229 v1.0

State of Indiana Homeland Security Building Permit

- Agency: State of Indiana Department of Homeland Security
- Permit Approval: February 13, 2024
- Updated Permit Approval: March 26, 2024
 - o Released full vertical building permit
- Permit Number: CDR-443702

Initial Temporary Construction Trailers

- Agency: City of Fort Wayne
- Permit Approval: February 16, 2024
- Permit Number: SITE-2024-0038

Title V New Source Construction (Minor PSD/EO)

- Agency: Indiana Department of Environmental Management (IDEM)
- Permit Approval: September 6, 2024
- Permit Number: 003-47378-00530

Civil Site Building Permit – Fire Tank & Pumphouse – Foundation & Underslab Only

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: February 22, 2024
- DPS Permit Number: SITE-2024-0039
- County Permit Number: BLD-C-24-004212

Civil Site Infrastructure Permit

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: February 20, 2024
- Permit Number: SITE-2024-0040

Civil Site Building Permit – Data Center – Foundation & Underslab Only

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: February 22, 2024
- Permit Number: SITE-2024-0041
- County Permit Number: BLD-C-24-004205

Civil Site Building Permit – Security Entrance – Foundation & Underslab Only

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: February 22, 2024
- Permit Number: SITE-2024-0042
- County Permit Number: BLD-C-24-004219

Waters of the State Determination

- Agency: IDEM
- Date of Issuance: April 3, 2024
- Project Number: 2024-137-2-EJW-Q

Isolated Wetland Individual Permit

- Agency: IDEM
- Permit Approval: July 7, 2024
- Permit Number: IWIP 2024-359-2-EJW-A

Waters of the State Determination

- Agency: IDEM
- Date of Issuance: April 23, 2025
- Project Number: 2025-75-2-EJW-WOSD

Project Zodiac - DC01 - Remodel Permit Phase 01

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: May 31, 2024
- Permit Number: SITE-2024-0183

Project Zodiac - DC01 - Remodel Permit Phase 02

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: May 31, 2024
- Permit Number: SITE-2024-0198

Project Zodiac - DC01 - Remodel Permit Phase 03

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: May 31, 2024
- Permit Number: SITE-2024-0199

Project Zodiac - DC01 - Remodel Permit Phase 04

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: May 31, 2024
- Permit Number: SITE-2024-0200

Project Zodiac - Initial Temporary Construction Trailer Updates

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: June 14, 2024
- Permit Number: SITE-2024-0202

Project Zodiac - DC01 - Private Substation

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: June 14, 2024
- Permit Number: SITE-2024-0206

Project Zodiac - Hub/Office Building

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: TBD
- Permit Number: SITE-2024-0280

Project Zodiac - Public Roadways

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: TBD
- Permit Number: SITE-2025-0112

Project Zodiac - DC02 Civil Site Development

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: **TBD**
- Permit Number: SITE-2025-0123

Project Zodiac - DC02 Civil Site Development Phase 2

- Agency: City of Fort Wayne & Allen County Building Department
- Permit Approval: **TBD**
- Permit Number: SITE-2025-0160

Project Zodiac - Trailer City

- Agency: City of Fort Wayne
- Permit Approval: **TBD**
- Permit Number: SITE-2025-0124

State of Indiana Homeland Security Building – Division of Fire & Building Safety**Permit Project Zodiac - ADC2A**

- Agency: State of Indiana Department of Homeland Security
- Permit Approval: May 14, 2025
- Permit Number: 453642

11. Signature - Statement of Affirmation

I certify that I am familiar with the information contained in this application and, to the best of my knowledge and belief, such information is true and accurate. I certify that I have the authority to undertake and will undertake the activities as described in this application. I am aware that there are penalties for submitting false information. I understand that any changes in project design subsequent to IDEM's granting of authorization to discharge to a water of the state are not authorized and I may be subject to civil and criminal penalties for proceeding without proper authorization. I agree to allow representatives of the IDEM to enter and inspect the project site. I understand that the granting of other permits by local, state, or federal agencies does not release me from the requirement of obtaining the authorization requested herein before commencing the project.

Applicant's Signature: _____



Date: 06/18/2025
(mm/dd/yyyy)

Print Name: Marc Stern

Title: Site Facilities Manager

Worksheet – Summary of Onsite Water Resources and Project Impacts

A. Jurisdictional Wetlands (Existing Conditions)		Jurisdictional Wetlands (Proposed Impacts)			
Wetland Type	Size of wetland (acreage)	To be Impacted?	Acreage	Fill quantity (cys)	ATF
☐ EM ☐ SS ☐ FO	NA*	☐ Yes ☐ No			
☐ EM ☐ SS ☐ FO		☐ Yes ☐ No			
☐ EM ☐ SS ☐ FO		☐ Yes ☐ No			
☐ EM ☐ SS ☐ FO		☐ Yes ☐ No			
☐ EM ☐ SS ☐ FO		☐ Yes ☐ No			
☐ EM ☐ SS ☐ FO		☐ Yes ☐ No			
☐ EM ☐ SS ☐ FO		☐ Yes ☐ No			

Describe the type and composition of fill material to be placed in wetlands on the project site:

*Jurisdictional wetland impacts were detailed on the 401 WQC Application Form submitted to IDEM on 4/25/2025.

Describe the type and composition and quantity (*cubic yards*) of material proposed to be dredged or excavated from wetlands on the project site:

B. Isolated Wetlands (Existing Conditions)			Isolated Wetlands (Proposed Impacts)			
Wetland Class	Type	Size of wetland (acreage)	To be Impacted?	Acreage	Fill quantity (cys)	ATF
☐ 1 ☒ 2 ☐ 3	☐ NF ☒ F	WL 1 - 5.73 AC	☐ Yes ☒ No	---	---	N
☐ 1 ☒ 2 ☐ 3	☒ NF ☐ F	WL1 - 1.65 AC	☒ Yes ☐ No	1.65 AC	2,662	N
☐ 1 ☒ 2 ☐ 3	☐ NF ☒ F	WL 2 - 0.79 AC	☒ Yes ☐ No	0.79 AC	1,275	N
☐ 1 ☒ 2 ☐ 3	☐ NF ☒ F	Multiple* - 0.97 AC	☐ Yes ☒ No	---	---	N
☐ 1 ☒ 2 ☐ 3	☐ NF ☒ F	WL 30 - 0.50 AC	☐ Yes ☒ No	---	---	N
☐ 1 ☒ 2 ☐ 3	☒ NF ☐ F	WL 30 - 0.12 AC	☐ Yes ☒ No	---	---	N

Describe the type and composition of fill material to be placed in isolated wetlands on the project site:

*Wetlands 23 (0.32 AC), 24 (0.14 AC), 26 (0.07 AC), 27 (0.03 AC), and 29 (0.41 AC) are isolated, Class II, forested wetlands that will be avoided. A portion of Wetland 1 and Wetland 2 will be filled in association with mass excavation of the project site. Fill will include clean soil fill.

Describe the type and composition and quantity (*cubic yards*) of material proposed to be dredged or excavated from isolated wetlands on the project site:

N/A

C. Bridges and Stream Crossings - provide the following information for EACH structure (Use additional sheet(s) if required.)

Stream name	N/A
Description of impacts	
Length of upstream bank impacts:	
Left side:	Right side:
Length of downstream bank impacts:	
Left side:	Right side:
Bank protection fill placed below the Ordinary High Water Mark:	Volume per running foot:
Bank protection fill placed below the Ordinary High Water Mark:	Area of coverage:

D. Bank Stabilization – provide the following information for EACH segment (Use additional sheet(s) if required.)

Water body name

N/A

Description of impacts

Length of shoreline or bank protection

Volume (*cubic yards*) of bank protection fill placed below the Ordinary High Water Mark per running footArea (*square feet*) of bank protection fill placed below the Ordinary High Water Mark**E. Stream Relocation**

Water body name

N/A

Description of impacts

Length of existing channel to be relocated (*linear feet*)Length of new channel to be constructed (*linear feet*)

Existing channel to be backfilled?

☐ Yes ☐ No

Type of relocation

☐ Piping ☐ Open ☐ Channel ☐ Other: _____Type of fill and volume (*cubic yards*)**F. Open Water Fill**

Water body name

N/A

Description of impacts

Area of water body to be filled (*acres*)Type of fill and volume (*cubic yards*)



PROJECT ZODIAC PHASE 2

Isolated Wetland Individual Permit Application

Hatchworks LLC

June 18, 2025



Engineers, Surveyors, Planners, Scientists
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20230659

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EXHIBITS

Exhibit 1:	Project Location Map
Exhibit 2:	USGS Topographic Map
Exhibit 3:	Delineation Map
Exhibit 4:	Project Zodiac Phase 2 Exhibit (Alternate A)

PHOTOGRAPHS**APPENDICES**

APPENDIX A:	USACE Jurisdictional Determinations
APPENDIX B:	Water of the State Determination
APPENDIX C:	Tract History
APPENDIX D:	Primary Development Plan Approvals

1.0 INTRODUCTION

This application for an Isolated Wetland Individual Permit from the Indiana Department of Environmental Management (IDEM) was prepared by EMH&T on behalf of Hatchworks LLC for impacts to state regulated isolated wetlands associated with the second phase of a proposed industrial technology development known as Project Zodiac.

The proposed project involves the phased construction of a data center campus on approximately 858 acres of land located near the intersection of East Paulding Road and Adams Center Road in the City of Fort Wayne, Allen County, Indiana. The first phase of construction was authorized under an IDEM Isolated Wetland Individual Permit (IWIP) (Permit No. IWIP 2024-359-2-EJW-A, issued July 7, 2024). This initial phase included the construction of one data center building (DC01), an office/support building, electrical switching station facilities, electrical transmission line corridors, parking lots, site entrances and drives, stormwater facilities and associated infrastructure on approximately 455 acres of land.

The second phase of construction, which is the subject of this permit application, will expand the permit area to approximately 585 acres. The second phase will provide for the construction of five additional data center buildings (DC02-DC06) and appurtenant facilities. This phase of construction will complete the build out of the portion of the data center campus located north of the AEP high-voltage transmission lines that traverse the site.

The applicant requests authorization to impact 1.65 acres of non-forested, Class II isolated wetlands and 0.79 acre of forested, Class II isolated wetlands in association with the second phase of construction. In order to provide a complete Isolated Wetland Individual Permit application, this report provides discussion of the following:

- project location and tract history;
- project purpose and overview of proposed activities;
- size and location of the isolated wetlands onsite;
- classifications of the isolated wetlands;
- avoidance and minimization measures;
- compensatory wetland mitigation plan; and
- other permitting requirements.

Hatchworks LLC is seeking separate authorization under Nationwide Permit 39 with Individual Section 401 Water Quality Certification for certain jurisdictional impacts associated with the second phase of Project Zodiac. Those permit applications were submitted to the U.S. Army Corps of Engineers and IDEM on March 25, 2025 and April 25, 2025, respectively.

The first phase of Project Zodiac commenced in February 2024 in upland areas. Isolated wetland fills associated with the first phase of construction, which were authorized in July 2024, are expected to be completed in mid-2025. The second phase of construction, including impacts described herein, is expected to commence in October 2025 following permit approval. Future phases of Project Zodiac will be permitted, considering cumulative impacts, in accordance with state and federal law.

2.0 SITE DESCRIPTION

As shown on Exhibit 1, the approximately 585-acre permit area is located east of Adams Center Road, south of Logistics Drive, and west of the Chicago, Fort Wayne & Eastern (CFE) Railroad in the City of Fort Wayne, Allen County, Indiana. The approximate center coordinates of the site are 41.033378°, -85.048069°. The permit area is located in the Trier Ditch subwatershed of the Upper Maumee River subbasin (HUC: 04100005-01-02).

As shown on Exhibit 2, the permit area lies between approximately 790 feet and 800 feet in elevation (National Geodetic Vertical Datum) according to the United States Geological Survey (USGS) 7.5' Series *Fort Wayne East, Indiana* quadrangle (USGS, 1963). An unnamed, intermittent stream is mapped flowing southeast to northwest through the southwestern portion of the permit area before flowing offsite to the west. Adams Ditch is depicted as an intermittent stream flowing along the southeast corner of the permit area. Marsh symbols are mapped in the northern and southwestern portions of the permit area. Wetlands were delineated in the general location of these marsh symbols during the field evaluation, and the mapped streams were observed and were determined to be jurisdictional. The results of the field evaluation of the site are discussed in Section 3.0 of this report.

The permit area associated with the second phase of construction will occur in the area bound by Adams Center Road to the west, Logistics Drive to the north, the CFE Railroad to the east and the electric transmission line to the south. The permit area is bisected east-west by East Paulding Road/Zodiac Way. The permit area includes the permit area associated with the 2024 IWIP, much of which has been graded/disturbed in association with the first phase of project construction. The remainder of the permit area consists of cultivated and fallow agricultural fields, fencerows and fragmented woodlots. An aerial photograph of the project area is provided on Exhibit 3.

3.0 WETLAND DELINEATION & CLASSIFICATION

A delineation to determine the location and extent of potential surface waters within the permit area was conducted by EMH&T on August 7-16 and October 2-3, 2023. The delineation covered a total of ±858 acres, a larger area than is currently proposed as the permit area. Two (2) delineation reports were submitted to the U.S. Army Corps of Engineers (USACE) on September 27, 2023 and October 26, 2023 for review and verification. Preliminary & Approved Jurisdictional Determinations (PJD/AJD) were issued by the USACE on February 7, 2024 and June 18, 2024 (Appendix A). The delineation reports were previously provided to IDEM under separate cover.

3.1 Delineation Results

Within the permit area, EMH&T identified 24 non-jurisdictional, isolated wetlands (or portions thereof), totaling 11.70 acres (Table 1). This does not include the isolated wetlands previously exempted or permitted under the 2024 IWIP. Five (5) jurisdictional wetlands (17.31 acres) and three (3) jurisdictional streams (4,350 linear feet) were also identified (Table 2). The location and extent of waters identified are shown on Exhibit 3.

TABLE 1: Extent and Classification of Onsite Isolated Wetlands

Name	Cowardin Classification	Wetland Area (acres)
Wetland 1	PFO	5.73*
	PEM (Crop)	1.65
Wetland 2	PFO	0.79
Wetland 3	PFO	0.02
Wetland 4	PFO	0.01
Wetland 5	PEM (Crop)	0.40
Wetland 6	PEM (Crop)	0.20
Wetland 8	PEM (Crop)	0.24
Wetland 9	PEM (Crop)	0.13
Wetland 10	PEM (Crop)	0.41
Wetland 12	PEM (Crop)	0.02
Wetland 13	PEM	0.05
Wetland 16	PFO	0.02
	PEM	0.14
Wetland 17	PEM (Crop)	0.04
Wetland 18	PEM (Crop)	0.02
Wetland 19	PEM (Crop)	0.12
Wetland 20	PEM (Crop)	0.07
Wetland 22	PEM (Crop)	0.04
Wetland 23	PFO	0.32
Wetland 24	PFO	0.14
Wetland 25	PEM	0.01
Wetland 26	PFO	0.07
Wetland 27	PFO	0.03
Wetland 29	PFO	0.41
Wetland 30	PFO	0.50
	PEM (Crop)	0.12
TOTAL	--	11.70

* Wetland extends offsite; represents portion of the wetland located within the permit area.

TABLE 2: Extent and Classification of Onsite Jurisdictional Waters

Name	Cowardin Classification	Jurisdictional Stream		Jurisdictional Wetland (AC)
		Length (LF)	Area (AC)	
Stream 2	R4	614	0.14	--
Stream 5	R4	3,555	0.49	--
Stream 6	n/a (ephemeral)	181	0.02	--
Stream Total	--	4,350	0.65	--
Wetland 11	PEM	--	--	0.04
Wetland 21	PEM/PFO	--	--	0.19
Wetland 28	PFO	--	--	9.01
Wetland 58	PFO	--	--	0.60
Wetland 59	PFO	--	--	7.47*
Wetland Total	--	--	--	17.31

* Wetland extends offsite; represents portion of the wetland located within the permit area.

3.2 Wetland Habitat Assessment

The isolated wetlands within the permit area were classified using the revised IDEM State Regulated Wetland (SRW) Class Determination Worksheet. In addition, the wetlands were scored using the Ohio Rapid Assessment Method (ORAM) for Wetlands. The SRW Class Determination Worksheets and ORAM forms were previously provided to IDEM under separate cover. The results of the assessments are summarized in Table 3.

In compliance with the changes to Indiana's Isolated Wetlands Laws enacted via Public Law 1-2024, which became effective July 1, 2024, all of the onsite isolated wetlands are determined to be SRW Class I or II wetlands by IDEM. This is discussed further below.

TABLE 3: Isolated Wetlands Habitat Assessment Summary

Name	Cowardin Class	Area (acres)	ORAM Score	ORAM Category ²	SRW Class
Wetland 1	PFO	5.73 ¹	56	2	II
Wetland 1	PEM (Crop)	1.65	56	2	II
Wetland 2	PFO	0.79	60.5	2 or 3	II
Wetland 3	PFO	0.02	54	2	II
Wetland 4	PFO	0.01	55	2	II
Wetland 5	PEM (Crop)	0.40	17	1	II
Wetland 6	PEM (Crop)	0.20	17	1	I
Wetland 8	PEM (Crop)	0.24	15	1	I
Wetland 9	PEM (Crop)	0.13	17	1	I
Wetland 10	PEM (Crop)	0.41	19	1	II
Wetland 12	PEM (Crop)	0.02	16	1	I
Wetland 13	PEM	0.05	26	1	I
Wetland 16	PFO	0.02	36	Mod 2	I
Wetland 16	PEM	0.14	36	Mod 2	I
Wetland 17	PEM (Crop)	0.04	16	1	I
Wetland 18	PEM (Crop)	0.02	16	1	I
Wetland 19	PEM (Crop)	0.12	20	1	I
Wetland 20	PEM (Crop)	0.07	16	1	I
Wetland 22	PEM (Crop)	0.04	17	1	I
Wetland 23	PFO	0.32	37.5	Mod 2	II
Wetland 24	PFO	0.14	37.5	Mod 2	II
Wetland 25	PEM	0.01	29	1	I
Wetland 26	PFO	0.07	53	2	II
Wetland 27	PFO	0.03	56	2	II
Wetland 29	PFO	0.41	45.5	2	II
Wetland 30	PFO	0.50	42.5	Mod 2	II
Wetland 30	PEM (Crop)	0.12	42.5	Mod 2	II
TOTAL	--	11.70	--	--	--

1. Wetland extends offsite; represents portion of the wetland located within the permit area.

2. ORAM Category 1 (1), Modified Category 2 (Mod 2), Category 2 (2), Category 2 or 3 (2 or 3)

3.3 Wetland Exemptions and Classifications

Public Law 1-2024 made changes to Indiana's Isolated Wetland Laws. Under these changes, which became effective July 1, 2024, 12 wetlands (Wetlands 6, 8, 9, 12, 13, 16, 17, 18, 19, 20, 22 and 25) are exempt as Class I wetlands under IC 13-11-2-74.5(a)(5). These wetlands are not subject to permitting per IC 13-18-22-1(b)(5) (effective 7/1/2024).

Additionally, 10 wetlands are considered Class 2 isolated wetlands, which are under 3/4 (0.75) acre and located within the boundaries of a municipality. As such, these wetlands meet the IC 13-11-2-74.5(a)(6)(B) exemption. These include Wetlands 3, 4, 5, 10, 23, 24, 26, 27, 29, and 30 (2.43 acres total). This applicant intends to claim this exemption for Wetlands 3, 4, 5 and 10 (0.84 acre total), which collectively do not exceed 60% of the area of wetlands that qualify for the exemption in accordance with IC 13-11-2-74.5(c) (effective 7/1/2024).

Accordingly, Wetlands 3, 4, 5, 6, 8, 9, 10, 12, 13, 16, 17, 18, 19, 20, 22 and 25 are considered exempt and not subject to permitting. These wetlands are not discussed further herein. The Water of the State Determination documenting these exemptions is provided in Appendix B.

3.4 Tract History

The permit area has been agricultural in use dating back to the early 1900s. Historical aerial photographs of the site from 1938 to 2021 are provided in Appendix C. As shown on these aerial photographs, the land use has been fairly consistent since 1938, consisting primarily of agricultural fields and rural residences with three forested woodlots present. Clearing of the electric transmission line easement occurred sometime between 1973 and 1981 along the southern boundary of the permit area. Development along Logistics Drive north of the permit area occurred between 1998 and 2008.

4.0 PROJECT PURPOSE & DESCRIPTION

4.1 Project Purpose

The purpose of the proposed project is to construct a state-of-the-art, hyperscale data center campus, providing up to nine data center buildings. The first phase of development, which was previously permitted under an IDEM IWP, involved the construction of the first data center building. The second phase of development, which is the subject of this permit application, is proposed to include the construction of five additional data center buildings and appurtenant improvements.

4.2 Anticipated Project Schedule

The second phase of construction, including impacts described herein, is expected to commence in October 2025. Mass excavation activities for the second phase of construction are expected to continue onsite through December 2026, at which time all requested stream and wetland fills will be completed. Building construction is anticipated to continue through 2029.

4.3 Proposed Isolated Wetland Impacts

The proposed development plan is depicted on Exhibit 4. This design provides for the expansion of the data center campus by providing five additional data center buildings (comprising 1,448,800 square feet in total), as well as associated utility infrastructure, internal drives, and stormwater facilities within the proposed expansion footprint. The proposed plan conforms to certain layout and building size requirements specified by the end use.

As shown on Exhibit 4, the development plan requires impacts to two (2) regulated isolated wetlands (2.44 acres), as described below:

- The cropped portion of Wetland 1, which includes 1.65 acres of non-forested, Class II wetland. This portion of Wetland 1 will be filled to accommodate the construction of the stormwater basin located north of DC04 and DC05.
- Wetland 2, which is a 0.79-acre forested, Class II wetland. This wetland will be filled to accommodate construction of DC05 and its associated equipment yard.

The proposed isolated wetland impacts are summarized in Table 4. As shown, the proposed impacts to regulated isolated wetlands include 1.65 acres of Class II non-forested wetland and 0.79 acre of Class II forested wetlands. Cumulatively, including the prior 2024 IWIP impacts (3.61 acres), Phases 1 and 2 of the development will impact 1.65 acres of Class II non-forested wetland and 4.40 acres of Class II forested wetlands (6.05 acres total), as summarized in Table 5. All other regulated isolated wetlands within the permit area will be avoided.

TABLE 4: Proposed Regulated Isolated Wetland Impacts

Name	Cowardin Classification	SRW Class	Area (acres)	Proposed Impact (acres)	Area Avoided (acres)
Wetland 1	PFO	II	5.73*	--	5.73
Wetland 1	PEM (Crop)	II	1.65	1.65	--
Wetland 2	PFO	II	0.79	0.79	--
Wetland 23	PFO	II	0.32	--	0.32
Wetland 24	PFO	II	0.14	--	0.14
Wetland 26	PFO	II	0.07	--	0.07
Wetland 27	PFO	II	0.03	--	0.03
Wetland 29	PFO	II	0.41	--	0.41
Wetland 30	PFO	II	0.50	--	0.50
Wetland 30	PEM (Crop)	II	0.12	--	0.12
TOTAL	--	--	9.76	2.44	7.32
Forested	--	--	7.99	0.79	7.20
Non-Forested	--	--	1.77	1.65	0.12

* Wetland extends offsite; represents portion of the wetland located within the permit area.

TABLE 5: Cumulative Regulated Isolated Wetland Impacts for Phases 1 and 2

Name	Cowardin Classification	SRW Class	Area (acres)	Proposed Impact (acres)	Area Avoided (acres)
Phase 1					
Wetland 32	PFO	II	2.28*	2.28	--
Wetland 34	PFO	II	0.07*	0.07	--
Wetland 55	PFO	II	1.26*	1.26	--
Wetland 60	PFO	II	0.10	--	0.10
Wetland 61	PFO	II	0.03*	--	0.03
SUBTOTAL	--	--	3.74	3.61	0.13
Forested	--	--	3.74	3.61	0.13
Non-Forested	--	--	0	0	0
Phase 2					
Wetland 1	PFO	II	5.73*	--	5.73
Wetland 1	PEM (Crop)	II	1.65	1.65	--
Wetland 2	PFO	II	0.79	0.79	--
Wetland 23	PFO	II	0.32	--	0.32
Wetland 24	PFO	II	0.14	--	0.14
Wetland 26	PFO	II	0.07	--	0.07
Wetland 27	PFO	II	0.03	--	0.03
Wetland 29	PFO	II	0.41	--	0.41
Wetland 30	PFO	II	0.50	--	0.50
Wetland 30	PEM (Crop)	II	0.12	--	0.12
SUBTOTAL	--	--	9.76	2.44	7.32
Forested	--	--	7.99	0.79	7.20
Non-Forested	--	--	1.77	1.65	0.12
TOTAL	--	--	13.50	6.05	7.45
Forested	--	--	11.73	4.40	7.33
Non-Forested	--	--	1.77	1.65	0.12

* Wetland extends offsite; represents portion of the wetland located within the permit area.

5.0 AVOIDANCE & MINIMIZATION

The Phase 2 development plan went through an iterative process to reduce impacts to surface water resources to the extent practicable. However, it was determined that both meeting the project purpose and completely avoiding water resources was not feasible. Regarding the area north of Zodiac Way, priority was placed upon avoiding the forested portion of Wetland 1 (5.73 acres, isolated) and Wetland 28 (9.01 acres, jurisdictional) and as much of the associated woodlots as possible, given the size and quality of these wetlands.

Given these constraints, and the required layout and dimensions of the data center buildings, it is not possible to accommodate three data center buildings and associated stormwater infrastructure north of Zodiac Way without impacts to the non-forested portion of Wetland 1 or Wetland 2. Avoidance of Wetland 2 in particular is infeasible given its location within the footprint of the proposed DC06 equipment yard.

Similarly, south of Zodiac Way, priority was placed on avoiding Wetlands 58 (0.60 acre, jurisdictional) and Wetland 59 (7.47 acres, isolated) and the woodlot in which they are located. Given this constraint, it is not possible to implement construction of at least two additional data center buildings west of DC01 and south of Zodiac Way without the relocation of Stream 5. Based on the supporting utility infrastructure, equipment yards, committed zoning restrictions and buffer requirements, it is not possible to fit a building between Adams Center Road and Stream 5 in its current alignment. Complete avoidance of Stream 5, Wetland 58 and Wetland 59 would reduce the buildable area south of Zodiac Way such that only one additional data center could be constructed, which would not meet the project purpose.

Additionally, for activities in Class II isolated wetlands, the activity is considered to be without reasonable alternative and is considered to be reasonably necessary or appropriate if: (1) the executive of the county or local municipality issues a resolution or (2) a local government entity issues a permit or other approval, which states that the wetland activity is without reasonable alternative and is reasonably necessary or appropriate to achieve a legitimate use proposed by the applicant on the property on which the wetland is located (327 IAC 17-4-8 and 327 IAC 17-4-9). Such resolution or approval substitutes for the information required on avoidance and minimization.

The Primary Development Plan (PDP) for Project Zodiac was approved by the Allen County Plan Commission on November 16, 2023 and the City of Fort Wayne Plan Commission on November 30, 2023. Copies of these approvals and the PDP are provided in Appendix D. Note that the PDP was approved prior to the annexation of a portion of the site that was located in Allen County; the site is now entirely located in the City of Fort Wayne.

6.0 MITIGATION

In order to proceed with the second phase of the proposed project, authorization for the fill of 2.44 acres of isolated Class II wetland is requested. To compensate for this impact, the purchase of either mitigation bank or in-lieu fee credit is proposed. Based on the mitigation requirements described in IC 13-18-22-6 (effective 7/1/2024), mitigation for impacts to Class II non-forested and forested wetlands shall be provided at a 1.5:1 and 2:1 ratio, respectively. Accordingly, the mitigation to be provided is shown in Table 6.

TABLE 6: Wetland Impacts and Required Mitigation Acreage

Wetland	Cowardin Classification	SRW Class	Proposed Impact (acres)	Mitigation Ratio	Mitigation Acreage
Wetland 1	PFO	II	--	--	--
Wetland 1	PEM (Crop)	II	1.65	1.5:1	2.48
Wetland 2	PFO	II	0.79	2:1	1.58
Wetland 23	PFO	II	--	--	--
Wetland 24	PFO	II	--	--	--
Wetland 26	PFO	II	--	--	--
Wetland 27	PFO	II	--	--	--
Wetland 29	PFO	II	--	--	--
Wetland 30	PFO	II	--	--	--
Wetland 30	PEM (Crop)	II	--	--	--
Total	--	--	2.44	--	4.06
Forested	--	--	0.79	--	1.58
Non-Forested	--	--	1.65	--	2.48

In accordance with IC 13-18-22-6 (effective 7/1/2024), compensatory mitigation for state regulated isolated wetlands must occur within the same:

- 1) eight-digit U.S. Geological Service hydrologic unit code; or
- 2) county, as the isolated wetlands subject to the authorized wetland activity; or
- 3) within a designated service area established in an in-lieu fee mitigation program approved by the department.

The applicant proposes to purchase mitigation credit for the proposed project from the Openings Mitigation Bank. The Openings Mitigation Bank is located in Eel River Township, Allen County, Indiana on the border between the Eel and St. Joseph River watersheds (HUC 05120104 and 04100003). For impacts to isolated wetlands, the primary service area of the bank includes the portion of the Upper Maumee watershed (HUC 04100005) within Allen County. In the event that sufficient credit from the Openings Mitigation Bank is unavailable, the applicant will satisfy the mitigation obligation via purchase of credit from the Indiana Department of Natural Resources In-Lieu Fee Mitigation Program.

7.0 CONCLUSIONS

Hatchworks LLC requests authorization to impact an additional 2.44 acres of regulated isolated wetlands on the expanded ± 585 -acre Project Zodiac Phase 2 permit area located in the City of Fort Wayne, Allen County, Indiana. This document was prepared by EMH&T to provide information to address permit application requirements for an Isolated Wetland Individual Permit from IDEM. The wetlands to be filled will allow for the construction of the second phase of a data center campus, including five additional data center buildings (providing at least 1,448,800 square feet of building space) and supporting facilities and infrastructure.

Due to the location of the onsite isolated wetlands and the required minimum size of the development, it is not possible to construct the data center facility on the site without isolated wetland impacts. Under the proposed development plan, Phase 2 of the project requires impacts to 1.65 acres of Class II, non-forested wetlands and 0.79 acre of Class II, forested wetlands. To mitigate for these impacts, the applicant is proposing to purchase 4.06 acres of wetland mitigation bank or in-lieu fee credit, to be determined based upon credit availability.

EXHIBITS



ARCHITECTURE

STRUCTURE

M.E.P.

CIVIL

EMARK ENGINEERS SURVEYORS,
SURVEYS AND PLANNING
5500 NEW ALBANY ROAD
COLUMBUS, OH 43054
PH. (614) 775-4500
FX. (614) 775-4680

PROJECT ZODIAC PHASE 2

EXHIBIT

ALTERNATE A

N

REVISIONS	
NO.	DATE DESCRIPTION

DRAWN: _____

FOR TAYLOR, IN _____

2025-03-21

SCALE: 1" = 200'

GRAPHIC SCALE
0 100 200 400

SHEET NUMBER:

EXHIBIT 4

PAPER SIZE: E (36"x48")
PHASE DD1

[illegible]

FORT WAYNE, IN 2025-03-22

GRAPHIC SCALE

0 100 200 400

SHEET NUMBER

EXHIBIT 4

PAPER SIZE: E (36"x48")

PHASE: DD1