



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 12
5500 TRANSPORTATION BLVD. • GARFIELD HGTS., OH 44125 • 216-581-2100

Supplemental Re-Evaluation

for

CUY US 006 14.56 Tower B PID 115039

Environmental Document Level: C2

Approved: 4/8/2026

Prepared By: District 12

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The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by ODOT pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated December 14, 2020, and executed by FHWA and ODOT.

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Re-evaluation Level

Explain why a re-evaluation is needed?

During planning and construction, ODOT District 12's original intent was to save the Detroit-Superior Bridge (SFN 1800930) Tower B. Tower B started moving during construction and it became an emergency situation, work was paused. Tower B is an aesthetic detail for the Detroit-Superior Bridge, and it is not required for support for the bridge. The Tower is hollow and is not structurally connected to the deck itself. Once the Tower has been removed, a new wall will be formed and matched aesthetically to the Detroit-Superior Bridge. Cultural Resources and Section 4(f) re-evaluation is required.



C2

Project Information

C2 Section

| | |
|---|------------------------|
| PIDs | 115039 |
| Project Sponsor | ODOT Sponsoring Agency |
| ODOT District | 12 |
| Funding Source | Non-Federal |
| Does this project require a Federal permit or approval? | No |
| Project Description: | |



Supplemental Re-evaluation Level C2
PID 115039 CUY US 006 14.56 Tower B
Submitted for Approval Printed 4/8/2026

Re-evaluation - During planning and construction, ODOT District 12's original intent was to save the Detroit-Superior Bridge (SFN 1800930) was paused. Tower B is an aesthetic detail for the Detroit-Superior Bridge, and it is not required for support for the bridge. The Tower is hollow will be formed and matched aesthetically to the Detroit-Superior Bridge. Cultural Resources and Section 4(f) re-evaluation is required.

Cultural Resources: The character-defining features of the Detroit-Superior Bridge are its 1917 steel through-arch and concrete deck arch. To trade-off to protect more critical historic components, specifically the cantilevered sidewalk. To comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties. Removing original material can be mitigated by replacing the column with a replacement that will match the original design aesthetic to preserve their integrity of materials, workmanship, setting, feeling, and association. These repairs will improve the historic bridge's preservation Standards for the Treatment of Historic Properties. Additionally, the investigation found that the project will cause no physical or visual degradation that the replacement column will match the original design aesthetic. Aside from the bridge, no above-ground, pre-1977 properties will be affected in the Archaeological District, the localized, above-ground nature of the demolition and replacement makes it unlikely that the work will disturb any historic deposits and industrial development. In accordance with 36 CFR Section 800.5(b) and the Section 106 Programmatic Agreement (Agreement No. 106-17-001) is applicable to the subject project. This completes the Section 106 review, pending completion of the SHPO/THPO review period. No further action concerning this Section 106 effect determination may be addressed to Tom Barrett, Historic Bridge Program Manager, at Tom.Barrett@dot.ohio.gov

Section 4(f):The undertaking involves the removal and replacement of the unstable Tower B of the National Register-listed Detroit-Superior Bridge with a neoclassical column in the same location as the original. This will allow the bridge to retain its historic aesthetic while preventing future structural damage that is currently in danger of being damaged by the column rotation. The work will take place within the existing right-of-way. The project will not affect the NRHP Detroit-Superior Bridge (OHI CUY0296502; NR#74001437), the Cleveland Centre Historic District (NR#13001117), and the West Side historic boundaries of these districts. Tower B will be replaced with a similar neoclassical column in the same location as the original. On April 10, 2023, executed June 29, 2023, ODOT-OES determined the project is of a type with 'No Adverse Effect'. Based on the SHPO's concurrence with ODOT, US 006 14.56 Tower B (PID 115039) bridge maintenance project will not result in the use of a Section 4(f) cultural resource.

The C2 Re-evaluation approval is based on Final Plans. The plans are included in Project File/General/Project Information/Final Plans.

Stabilize the foundation of the Detroit-Superior Bridge Tower B, drilled shaft foundation, based on the previously completed study. A feasibility study is required.

No permanent or temporary right-of-way is required for this project. Utility impacts are likely.

Construction will not require a maintenance of traffic (MOT).

The project is not located in a regulated floodplain, therefore no coordination is required.

Cultural Resources was coordinated as Minimal Potential to Cause Effect - Appendix B. The historic bridge maintenance and preservation project is located on the Cleveland (US 6). The work will install micropiles around perimeter of the Tower B footing, install a deep foundation system adjacent to the Tower B foundation. The micropiles will be installed around the three-sided perimeter of the existing footing. The 9.5-inch diameter piles will be drilled so the work can be done without overhead obstructions. A reinforced concrete footing extension will be installed to connect the micropiles to the existing foundation. The remediation project (PID 112646), is 40 years. If the Irishtown Bend project is not completed, the estimated life is 20 years. The concrete Tower B will be replaced and feeling of the 1917-built Detroit-Superior Bridge. None of the elements that qualified the bridge for listing in the NRHP in 1974 will be removed. The bridge is characterized by alluvial deposits and previous construction disturbances. Therefore, the presence of intact archaeological deposits is unlikely. The Section 106 Programmatic Agreement executed November 8, 2017 amended July 11, 2019, ODOT-OES determined the undertaking has minimal potential to affect historic resources. A Regulated Materials Review Screening was prepared by Corey Czinger, Environmental Specialist. Based on findings, no further Regulated Materials Review on 09/22/22.

No other environmental, hazardous materials, Section 4(f)/6(f), or underserved population impacts will result from this project. Metroparks project is not required. There are no park facilities on the property and no property is required for the project. No Section 4(f) coordination was required.

The environmental documentation and associated studies are being approved using Alternative 5A Plan Sheets. A copy of the plans is included in the project file.

The next phase of the proposed project is listed on the STIP: Yes

Ellis STIP Details

| Phase | Current STIP Reference |
|-------|------------------------|
| ENV | On Previous STIP |
| RW | On Previous STIP |
| CO | 115039: 26-29 STIP |

The current cost estimate is in line with existing federal procedures for Ohio STIP Amendments and Administration Modifications: Yes



Select the appropriate project type:

(26) Modernization of a highway by resurfacing, restoration, rehabilitation, reconstruction, adding shoulders, or adding auxiliary lanes (including parking, weaving, turning, and climbing lanes), if the action meets the constraints in paragraph I of this section. **Examples include: Joint or limited use of right-of-way where the proposed use would have minimal or no adverse social (including highway safety), economic or environmental impacts; Installation of new noise walls and other new noise mitigation projects; Construction of highway safety and truck escape ramps; Construction of bicycle lanes and pedestrian walkways, sidewalks, shared-use paths, or facilities and trailhead parking that do not otherwise qualify for a C1 designation; Beautification or facility improvement projects (i.e. landscaping, curb and gutter installation and replacement, ADA ramps/curb ramps, installation of park benches, decorative lighting, etc.); Construction of alternative energy facilities (fuel tank farms, wind turbines, etc.)**

In accordance with 23 CFR 771.117(e), the proposed project cannot be processed as a C2 CE, if it involves - a. Acquisition of more than a minor amount of ROW (exceeds strip takes) b. Residential or non-residential displacements c. A U.S. Coast Guard permit or an Individual Section 404 permit under the Clean Water Act d. A Section 106 finding of Adverse Effect e. Section 4(f) impacts greater than de minimis f. A finding of May Affect, Likely to Adversely Affect to Threatened and Endangered Species g. Construction of temporary access, or the closure of existing road, bridge, or ramps, that would result in major traffic disruptions h. Changes in access control i. Floodplain encroachment other than functionally dependent uses (e.g., bridges, wetlands) or actions that facilitate open space use (e.g., recreational trails, bicycle and pedestrian paths) j. Construction activities in, across or adjacent to a river component designated or proposed for inclusion in the National System of Wild and Scenic Rivers k. No minor public or agency controversy on environmental grounds (no opposition from any organized groups or agencies and no unresolved environmental coordination) l. Substantial Community Impacts (if a Community Impact Assessment is required, contact OES for guidance). For certification purposes, documentation is required to illustrate no significant impacts will occur to the following environmental resources and that no unusual circumstances exist that would warrant a higher level of NEPA document. Upload all supporting documentation to the project file.

Ecological

Waterways: Not Present

Will any wetlands be impacted? No

The identified Federally Listed Species for the project received an effect determination of No Effect.

Endangered Species Remarks:

No effect towards endangered species.

Re-evaluation: Remarks are the same.

Scenic Rivers

No National Wild and Scenic River
Within 1000 Feet of the Proposed
Project Area

Scenic Rivers Remarks

No scenic rivers within 1000-feet of the project.

Re-evaluation: Remarks are the same.



Floodplains

100-Year Floodplain:

No Encroachment Within a Special
Flood Hazard Area (SFHA)

Floodplain Remarks

The project is not located in a regulated floodplain, therefore, no coordination was required. Floodplain mapping can be found in the Project File under Permits/Floodplain.

Re-evaluation: Remarks are the same.

Section 4(f)

Section 4(f):

Present; No Impacts and/or Access
Restrictions

Section 4(f) Remarks

No Section 4(f) impacts.

Re-evaluation: The undertaking involves the removal and replacement of the unstable Tower B of the National Register-listed Detroit-Superior Bridge (US 6; OHI CUY0296502; NR#74001437) in Cleveland. Tower B will be replaced with a similar neoclassical column in the same location as the original. This will allow the bridge to retain its historic aesthetic while preventing future structural damage. This proactive measure is necessary to preserve the cantilevered sidewalk system, which is currently in danger of being damaged by the column rotation. The work will take place within the existing right-of-way. The project will not involve any buildings, and no relocations will be required.

The project lies within the boundaries of the NRHP Detroit-Superior Bridge (OHI CUY0296502; NR#74001437), the Cleveland Centre Historic District (NR#13001117), and the West 25th Street-Detroit Avenue Historic District (NR#12001214). No land will be taken from the proposed historic boundaries of these districts. Tower B will be replaced with a similar neoclassical column in the same location as the original.

On April 2, 2026, in accordance with the Section 106 Programmatic Agreement (Agreement No. 38503) executed June 29, 2023, ODOT-OES determined the project is of a type with 'No Adverse Effect'. Based on the SHPO's concurrence with ODOT's finding of "No Adverse Effect" on April 2, 2026, in accordance with 23 CFR Part 774, the CUY US 006 14.56 Tower B (PID 115039) bridge maintenance project will not result in the use of a Section 4(f) cultural resource.

Section 6(f)

Section 6(f):

Not present

Cultural Resources

Cultural Resources:

Present; No Finding of Adverse
Effect

Cultural Resources Coordination:

Minimum Potential to Cause Effect
Appendix B

Cultural Resources Coordination - ODOT Approval/SHPO
Concurrence Date

04/12/2022



Cultural Resources Remarks

Cultural Resources was coordinated as Minimal Potential to Cause Effect - Appendix B. The historic bridge maintenance and preservation project will stabilize the foundation of the Detroit-Superior Bridge (SFN 1800930) Tower B in the City of Cleveland (US 6). The work will install micropiles around perimeter of the Tower B footing, install a deep foundation system adjacent to the Tower B footing, with a footing extension to provide a positive connection to the existing tower's foundation. The micropiles will be installed around the three-sided perimeter of the existing footing. The 9.5-inch diameter piles will be drilled and a single reinforcing bar is installed and grouted. Shorter micropile pieces will be spliced together so the work can be done without overhead obstructions. A reinforced concrete footing extension will be installed to connect the micropiles to the existing footing. The estimated life of this alternative, when coupled with the Irishtown Bend slope remediation project (PID 112646), is 40 years. If the Irishtown Bend project is not completed, the estimated life is 20 years. The concrete Tower B stabilization project will maintain and protect the original fabric, design, setting, workmanship and feeling of the 1917-built Detroit-Superior Bridge. None of the elements that qualified the bridge for listing in the NRHP in 1974 will be removed or demolished by the work. No other aboveground properties are located in the APE. The APE is characterized by alluvial deposits and previous construction disturbances. Therefore, the presence of intact archaeological deposits is unlikely. No further cultural resource investigations are recommended. In accordance with the Section 106 Programmatic Agreement executed November 8, 2017 amended July 11, 2019, ODOT-OES determined the undertaking has minimal potential to cause effects to properties listed in or eligible for listing in the NRHP.

Re-evaluation - The character-defining features of the Detroit-Superior Bridge are its 1917 steel through-arch and concrete deck arch. Tower B is classified as a minor, non-structural neoclassical element. Its removal is considered a necessary trade-off to protect more critical historic components, specifically the cantilevered sidewalk. To comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the investigation determined that the impact of removing original material can be mitigated by replacing the column with a replacement that will match the original design aesthetic to preserve the bridge's historic "feeling and association". The 1917 steel through-arch and concrete deck arch will retain their integrity of materials, workmanship, setting, feeling, and association. These repairs will improve the historic bridge's preservation potential into the future. The project will continue to follow the Secretary of the Interior's Standards for the Treatment of Historic Properties.

Additionally, the investigation found that the project will cause no physical or visual degradation to associated or adjacent historic districts. The bridge's visual integrity will remain intact given that the replacement column will match the original design aesthetic. Aside from the bridge, no above-ground, pre-1977 properties will be affected by the work. Furthermore, while the tower is in close proximity to the sensitive Irishtown Bend Archaeological District, the localized, above-ground nature of the demolition and replacement makes it unlikely that the work will disturb any intact archaeological deposits. The area surrounding the tower consists of previously disturbed river deposits and industrial development.

In accordance with 36 CFR Section 800.5(b) and the Section 106 Programmatic Agreement (Agreement No. 38503) executed on June 29, 2023, ODOT-OES has determined that a finding of 'no adverse effect' is applicable to the subject project. This completes the Section 106 review, pending completion of the SHPO/THPO review period. No further cultural resource investigations are required, unless the scope of the project changes. Any questions concerning this Section 106 effect determination may be addressed to Tom Barrett, Historic Bridge Program Manager, at Tom.Barrett@dot.ohio.gov.

Tribal Consultation Summary/Remarks:

Tribal Consultation Summary/Remarks not required.

Re-evaluation: Tribes were notified of the project on 4/2/2026. To date, no objections or comments were received. If a Tribe comments or objects to the project within the 30-day review, ODOT will address them in a timely and appropriate manner.

Environmental Resources Considered

The following environmental resources are present and have been studied for potential impacts:

Noise

Regulated Materials

Air Remarks



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The project type of 'Stabilize the foundation of the Detroit-Superior Bridge Tower B' is considered insignificant from an air quality conformity perspective, as per 40 CFR 93.126. Therefore, the project is exempt from air quality coordination.

Re-evaluation: Remarks are the same.

Noise: Studies Not Required

Noise - Coordination with OES No

Noise Remarks

The project is a stabilize the foundation of the Detroit-Superior Bridge Tower B in Cuyahoga County project. The project will not increase the traffic or traffic noise. Therefore, no noise analysis is required. The No Noise Analysis Required District Determination can be found in the Project File Under Noise/Project Information. District approval date 02/20/25.

Re-evaluation: Remarks are the same.

The project involves ROW acquisition, Deep Excavation, or OEPA 513 Landfill Authorization: Yes - Screening

Regulated Materials Review Screening:

No Further Regulated Materials Review

Regulated Materials Review Screening - DEC/OES Approval Date: 09/22/2022

Regulated Materials Review Remarks:

Regulated Materials Review Screening was prepared by Corey Czinger, Environmental Specialist. Based on findings, no further Regulated Materials Review is required. Juliet Denniss, Environmental Specialist at OES, approved Regulated Materials Review on 09/22/22.

Re-evaluation: Remarks are the same.

Public Involvement

Public Involvement: Minimum PI Requirements Met; No Minor Public or Agency Controversy on Environmental Grounds

Public Involvement Remarks

Public Involvement not required.

Re-evaluation: Remarks are the same.

Environmental Commitments

Environmental Commitments Yes



Environmental Commitments

C2

- 1) Elements that qualify the bridge for listing in the NRHP in 1974 cannot be removed or demolished by the work.
- 2) SHPO will have the opportunity to review the in-kind rendering of Tower B.



Preparers and Approvals

Form Preparer

District 12
Contact: Corey Czinger
Corey.Czinger@dot.ohio.gov

Supporting Form Preparer(s): Corey Czinger

Approvals & Electronic Signatures

| Approved & Electronically Signed By: | Approval Date: |
|--------------------------------------|----------------|
| Corey Czinger (ENV SPEC 3) | 4/8/2026 |



Appendix

ESA

OES Recommendations - Screening.pdf

Regulated Materials Review Form.pdf

General

Aerial Map.pdf

Noise

No Noise Analysis Required - District Determination.pdf

Cultural Resources

Minimal Potential to Cause Effect - Appendix B

SHPO Comments

Section 106 Scoping Request Form.pdf

Transmittal 1 - Effect Determination

Tribal Consultation

Tribal Consultation - Correspondence List.pdf

Ecological

ODNR Scenic River MOA Conditions

Section 4(f)

OES Cultural Resources 4(f) Determination - Re-Evaluation.pdf