



OHIO DEPARTMENT OF TRANSPORTATION

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

Supplemental Re-Evaluation for **CUY SR 014 06.93 Replace PID 104132** Environmental Document Level: C2

Approved: 4/14/2026

Prepared By: Libby Rushley

Lawhon AND Associates

E-mail: lrushley@lawhon-assoc.com

District Contact: Thomas Sorge

Phone: 216-584-2086

E-mail: Tom.Sorge@dot.ohio.gov

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.

Table of Contents

Re-evaluation Level.....	3
C2.....	4
Ecological.....	10
Environmental Commitments.....	11
Preparers and Approvals.....	13
Appendix.....	15



Re-evaluation Level

Explain why a re-evaluation is needed?

During construction, ODOT is proposing changes to the stormwater design. See the attached Plan sheets. The additional storm water work will upgrade an existing 12-inch pipe to a 21-inch pipe that currently outfalls into Mill Creek. The additional work will require 0.249 acres of temporary right-of-way from the Cleveland Metroparks' Garfield Park Reservation. Garfield Parkway will be closed for 14 calendar days for the installation for the 21" pipe. See MOT plan on Sheet. The contractor will coordinated with the Mill Creek culvert and stream restoration project currently under construction to minimize impacts to visitors to the Garfield Park Reservation.

OES reevaluated this new drainage work and determined the previous determination of de minimis is still valid for Garfield Park Reservation in accordance with 23 CFR 774. The determination was made based on the proposed scope of work and concurrence received from the Official with Jurisdiction (OWJ) regarding the assessment of impacts that are included in the DRF. See 4/14/26 OES Section 4(f)/6(f) Determination in the project file.



C2

Project Information

C2 Section

PIDs	104132
Project Sponsor	ODOT Sponsoring Agency
ODOT District	12
Funding Source	Federal

Project Description:

The Ohio Department of Transportation (ODOT) proposes to replace the SR 14 (Broadway Avenue) bridge, also known as 'Whitehouse Crossing' bridge over Garfield Park Reservation, Chaincraft Road, Norfolk & Southern rail lines, and Wheeling & Lake Erie Railway lines (leased to Cleveland Commercial Railroad) in the City of Garfield Heights, Cuyahoga County. The new bridge will be located slightly to the north of the existing structure. The project is partially located within Garfield Park Reservation. The bridge will include a multi-use trail on the south side of Broadway Avenue from 800-west of Henry Street intersection to the east end of the bridge over the railroad tracks. This will provide safer pedestrian connections between the neighborhoods to the east and the GCRTA bus stop at the Henry Street/Garfield Park Reservation intersection.

Approximately 3.583 acres of permanent right-of-way will be required from 8 parcels and 0.678 acres of temporary right-of-way from 6 parcels. Utility impacts are anticipated.

Traffic on Broadway Avenue & Chaincraft Road will be maintained during construction, using part-width techniques. Henry Street will be closed during Phase 2 of construction with traffic maintained via detour. Wetland impacts will occur and will require a USACE permit. Approximately 0.728 acres of suitable wooded habitat for the federally protected Indiana bat and northern long-eared bat, and state protected tricolored bat and little brown bat all within 100' EOP will be impacted by the project. The project is not located within a USFWS bat buffer zone. The project *may affect not likely to adversely affect* these species. A plan note will be included in the project plans to limit tree clearing to between October 1 & March 31. There is no suitable habitat for any other federally or state listed species within the project area.

The project is located within a regulated floodplain. Coordination was conducted with the local floodplain administrator on January 26, 2023. A Floodplain Statement of Findings was posted to the project website on January 12, 2023. The project will be designed to meet the requirements of the National Flood Insurance Program.

Garfield Park Reservation is a recognized Section 4(f) recreational property. This project will require permanent and temporary right-of-way from the Park to construct the new structure with multi-use trail, vegetated earthen slopes (instead of retaining wall per Cleveland Metroparks request), bioswale (Best Management Practice) for storm water management. Access will be maintained to the majority of the park during construction, with the exception of the area between Garfield Park Boulevard (within the park) and Chaincraft Road. Based on coordination with the Official with Jurisdiction and in accordance with 23 CFR



Supplemental Re-evaluation Level C2
 PID 104132 CUY SR 014 06.93 Replace
 Submitted for Approval Printed 4/14/2026

774, ODOT-OES determined on January 20, 2023 that the project will have a *de minimis* impact upon Garfield Park Reservation. Section 4(f) Measures to Minimize Harm are included in the environmental commitments. Garfield Park Reservation is also a recognized Section 6(f) property, meaning that improvements within Garfield Park Reservation were developed using National Park Service (NPS) Land and Water Conservation Funds under Grant # 39-01164. Based on mapping from NPS/ Ohio Department of Natural Resources (ODNR), only the area south of the existing bridge is subject to the Section 6(f) restrictions. Based on coordination to date with ODNR, the Section 6(f) impacts on the south side of the bridge related to inclusion of the multi-use trail and construction of vegetated earthen slopes as requested by CMP meets the Section 6(f) Maintenance Type use as defined in the ODOT/ODNR Section 6(f) MOU dated July 11, 2018. A Maintenance Type use will improve Section 6(f) property and does not require replacement property for reasonable impacts. ODOT-OES determined on January 19, 2023 that the project meets the Section 6(f) Maintenance Type use criteria.

No Cultural resources impacts, no hazardous materials impacts, no noise or air quality impacts, or impacts to underserved populations are associated with this project. An Asbestos Survey identified ACM on the structure. The Contractor will be required to submit the completed OEPA Notification of Demolition Form to OEPA at least 10 days prior to demolition activities.

A press release was issued on January 12, 2021 to notify the public about the project and direct them to the project website for information and to submit comments. In addition, over 1800 letters were sent to residents and property owners within a 1 mile radius of the project. Forty-eight written comments were received. ODOT responded to all of the comments by posting the responses on the website. A Public Involvement Summary and Conclusion Statement is included in the Project File.

The environmental document and associated studies are being approved using Stage 1 design. 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	
RW	On Previous STIP
CO	104132: 26-29 STIP
DD	On Previous 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:

(28) Bridge rehabilitation, reconstruction, or replacement or the construction of grade separation to replace existing at-grade railroad crossings, if the actions meet the constraints in 23 CFR 771.117(e). **Examples include: Railroad projects that close or relocate at-grade crossings**

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



Supplemental Re-evaluation Level C2
 PID 104132 CUY SR 014 06.93 Replace
 Submitted for Approval Printed 4/14/2026

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: Present; No Coast Guard, Individual 404, and/or Section 10 Permit required

Waterways Permit Type: Regional General Permit

Waterways Permit Approval Date 02/23/2026

Isolated Wetland Permit No

Will any wetlands be impacted? Yes

The following Federally Listed Species received an effect determination of May Affect, Not Likely to Adversely Affect:

The following Federally Listed Species received an effect determination of No Effect:

Species Common Name	Species Scientific Name	Listing Status	Most Recent Coordination Date
---------------------	-------------------------	----------------	-------------------------------

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

Endangered Species Remarks:

Species Name: Indiana Bat (*Myotis sodalis*) and Northern Long-eared Bat (*Myotis septentrionalis*)

Listing Status: Endangered/Threatened

Effect Determination (Completed by ODOT-OES): May Affect, Not Likely To Adversely Affect

Consultation Category (Completed by ODOT-OES): CC1

Suitable Habitat:

The 2016 PBO defines suitable wooded habitat (SWH) for these species as any tree covered area that is 0.5 ac or larger, containing any potential roosts (i.e., live trees and/or snags 3 inches dbh that have exfoliating bark, cracks, crevices, and/or cavities) greater than 13 ft tall and at least 3 in dbh, or any patch of trees with these characteristics that is less than 1/2 acre in size but is within 1,000 feet of or connected by a travel corridor to a PMRT, 1/2-acre or larger stand of SWH, or any patch of wooded riparian buffer.

Additionally, these species may use bridges over streams as summer roosting habitat. During the winter months these species inhabit hibernacula (typically caves, or abandoned mines that provide cool, humid, stable conditions for hibernation)

Scenic Rivers

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

Scenic Rivers Remarks

Project is not located within 1,000 feet of a national wild or scenic river.

Floodplains



100-Year Floodplain:

Encroachment Within the SFHA is a
Functionally Dependent Use

EO 11988 Compliance Met

Yes

NFIP Coordination and Documentation Completed

Yes

NFIP Local Floodplain Coordinator Notification Date:

03/07/2024

Floodplain Remarks

The Floodplain Administrator approved the floodplain permit on 3/7/24.

Section 4(f)

Section 4(f):

Present; No Programmatic
Evaluation or Individual Evaluation
Required

Section 4(f) Determination:

de minimis - Recreational

Section 4(f) Determination Date - de minimis - Recreational

04/14/2026

Section 4(f) Remarks

OES updated the DRF with the revised OWJ letters. The previous determination of de minimis is still valid for Garfield Park Reservation in accordance with 23 CFR 774. The determination was made based on the proposed scope of work and concurrence received from the Official with Jurisdiction (OWJ) regarding the assessment of impacts that are included in the DRF.

No further Section 4(f) coordination is required at this time. A re-evaluation of Section 4(f) impacts may be required if changes to the proposed scope of work alter the degree of impacts Garfield Park Reservation. Furthermore, all appropriate environmental commitments related to measures to minimize harm and/or resulting mitigation should be listed accordingly in the environmental document.

Section 6(f)

Section 6(f):

Present; No 6(f) Conversion
Required

Section 6(f) Determination:

Maintenance

Section 6(f) Determination Date:

04/14/2026

Cultural Resources

Cultural Resources:

Present; No Finding of Adverse
Effect

Cultural Resources Coordination:

Minimum Potential to Cause Effect
Appendix B



Supplemental Re-evaluation Level C2
PID 104132 CUY SR 014 06.93 Replace
Submitted for Approval Printed 4/14/2026

Cultural Resources Coordination - ODOT Approval/SHPO
Concurrence Date

12/20/2021

Cultural Resources Remarks

For the subject project, I updated the DRF with the revised OWJ letters. The subject project was processed as a Maintenance Type Project in accordance with Section B(1) of the Section 6(f) Memorandum of Understanding executed July 11, 2018 and re-executed on August 8, 2025. The Section 6(f) Maintenance Determination was issued January 19, 2023.

The original determination of Maintenance is still valid for the project.

Tribal Consultation
Summary/Remarks:

No tribal comments were received.

Environmental Resources Considered

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

Regulated Materials

Air Remarks

OES re-evaluated the need for a Site Specific Health and Safety plan based the recent lab data on the material underneath the bridge. Based on the finding that it is not flammable, the Site Specific Health and Safety Plan is no longer required. However, as discussed in our December 19, 2024 meeting, a plan note to direct the contractor to recycle the materials under the bridge should be placed into the plans.

Noise Remarks

The project is a bridge replacement over a railroad track in an industrial area. The Garfield Park Reservation is located on the south side of SR-14. The project will shift the roadway north away from the park property toward the industrial properties. The project will not add capacity to the bridge. Therefore, no noise analysis is required.

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

Yes - Screening

Regulated Materials Review Screening:

Plan Note Required

Regulated Materials Review Screening - DEC/OES Approval Date:

12/19/2024

Regulated Materials Review Remarks:

OES re-evaluated the need for a Site Specific Health and Safety plan based the recent lab data on the material underneath the bridge. Based on the finding that it is not flammable, the Site Specific Health and Safety Plan is no longer required. However, as discussed in our December 19, 2024 meeting, a plan note to direct the contractor to recycle the materials under the bridge should be placed into the plans.

Public Involvement

Public Involvement:

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

Public Involvement Remarks



Supplemental Re-evaluation Level C2
PID 104132 CUY SR 014 06.93 Replace
Submitted for Approval Printed 4/14/2026

ODOT issued a press release on January 11, 2021 and requested comments from the public from January 11-February 15, 2021. Please see the Project File/Public Involvement for comments and ODOT response.

Environmental Commitments

Environmental Commitments

Yes



Ecological

Wetlands

Based on the results of the ESR(s), no wetlands were observed within the study area(s) for this Environmental Document.

Remarks:



Environmental Commitments

C2

- 1) Ensure impacts to the federally listed and protected Indiana bat and northern long-eared bat and the State listed and protected little brown bat and tricolored bat are avoided and minimized. Do not remove trees from April 1 through September 30. Perform all necessary tree removal from October 1 through March 31. Demarcate clearing limits in the field to avoid any unauthorized tree clearing. For the purposes of this note, a tree is defined as a live, dying, or dead woody plant, with a trunk three inches or greater in diameter at a height of 4.5 feet above the ground surface, and with a minimum height of 13 feet.
- 2) Maintain safe public access to Garfield Park Reservation at all times during construction activities, with the exception of the area within the proposed construction limits, between Garfield Park Boulevard and Chaincraft Road.
- 3) Install and maintain temporary construction fencing along the known boundaries of Garfield Park Reservation within the project construction limits prior to the start of construction activities.
- 4) Prior to the start of construction activities, install signage approved by the Engineer to alert Garfield Park Reservation users of construction activities and access restrictions or closures, and to direct users to secondary access points.
- 5) The Contractor shall obtain a construction permit from Cleveland Metroparks prior to the start of construction activities.
- 6) Areas of temporary right-of-way within Garfield Park Reservation shall be restored to a condition which is at least as good as that which existed prior to the project.
- 7) Provide the construction schedule to the Department, Cleveland Metroparks, and City of Cleveland Department of Public Works 30 days prior to the start of construction activities.
- 8) ODOT will obtain all appropriate waterway permits prior to any work within the jurisdictional boundary of any waterway, including wetlands, and all Waterway Permit Special Provisions will be noted under Special Provisions in the plans and adhered to during construction.



9) ASBESTOS NOTIFICATION

A CERTIFIED ASBESTOS HAZARD EVALUATION SPECIALIST SURVEYED THE BRIDGE STRUCTURE SCHEDULED FOR DEMOLITION AND/OR REHABILITATION; THE SURVEY DETERMINED THAT 5 SQUARE FEET ASBESTOS IS PRESENT ON THE BRIDGE STRUCTURE.

ODOT SHALL PROVIDE A COPY OF THE OHIO ENVIRONMENTAL PROTECTION AGENCY (OEPA) NOTIFICATION OF DEMOLITION AND RENOVATION FORM, PARTIALLY COMPLETED AND SIGNED BY THE BRIDGE OWNER, TO THE SUCCESSFUL BIDDER. THE CONTRACTOR SHALL COMPLETE THE FORM AND SUBMIT IT TO ONE OF THE ADDRESSES BELOW AT LEAST TEN (10) WORKING DAYS PRIOR TO THE START OF ANY DEMOLITION AND/OR RENOVATION.

ASBESTOS PROGRAM

OHIO EPA, DAPC

P.O. BOX 1049

COLUMBUS, OH 43216-1049 OR ASBESTOS PROGRAM

OHIO EPA, DAPC

50 W. TOWN ST., SUITE 700

COLUMBUS, OH 43215

THE CONTRACTOR SHALL PROVIDE A COPY OF THE COMPLETED FORM TO THE ENGINEER AT LEAST TEN (10) WORKING DAYS PRIOR TO THE START OF ANY DEMOLITION AND/OR RENOVATION. THE FORM SHALL INCLUDE: 1) THE CONTRACTORS NAME AND ADDRESS, 2) THE SCHEDULED DATES FOR THE START AND COMPLETION OF THE BRIDGE REMOVAL AND 3) A DESCRIPTION OF THE PLANNED DEMOLITION WORK AND THE METHOD(S) TO BE USED. COPIES OF THE OEPA FORM AND BRIDGE INSPECTION REPORT ARE AVAILABLE FOR REVIEW AT THE ODOT DISTRICT 12 OFFICE, 5500 TRANSPORTATION BOULEVARD, GARFIELD HEIGHTS, OHIO 44125.

BASIS FOR PAYMENT THE CONTRACTOR SHALL FURNISH ALL FEES, LABOR, AND MATERIAL NECESSARY TO COMPLETE AND SUBMIT THE OEPA NOTIFICATION FORM. PAYMENT FOR THIS WORK SHALL BE INCLUDED IN: ITEM 202 PORTIONS OF STRUCTURE REMOVED, OVER 20 FOOT SPAN, AS PER PLAN.

10) The project will be designed to meet the requirements of the National Flood Insurance Program

11) The project designer will continue coordination with GCRTA to provide proper service during construction.

12) It is recommended that a Site Specific Health and Safety plan note be placed into the plans as a precaution since the project area has a history magnesium handling and fire from magnesium.



Preparers and Approvals

Form Preparer: Libby Rushley
Lawhon AND Associates
1441 King Avenue, Columbus OH 43212
lrushley@lawhon-assoc.com

Supporting Form Preparer(s): Andrew Fluegemann
Sumia Mohamed

Approvals & Electronic Signatures

Approved & Electronically Signed By:	Approval Date:
Thomas Sorge (PROGRAM ADMIN 3)	4/14/2026



Appendix

ESA

BUSTR File Review-rev.pdf

Underserved Populations

Census Mapping.pdf

ESA

OEPA Files-rev.pdf

OES Recommendations - Screening.pdf

Project Related OES Decision - ESA.pdf

Regulated Materials Review Form.pdf

General

Aerial Map.pdf

County Map.pdf

STIP Listing.pdf

USGS Quadrangle Topographical Map.pdf

Noise

District Determination - No Noise Analysis Required.pdf

RMR

Metroparks Access Permit for RMR Soil Borings.pdf

OES Review - Assess-Inv Commitment.pdf

OES Review - RMR Investigation.pdf

OES Review - SSHJSP Re-eval-Need Recycling.pdf

OES Review - Screening RMR Investigation Required.pdf

Cultural Resources

Minimal Potential to Cause Effect - Appendix B

Records Check.pdf

Ecological

Coordination with ODNR and USFWS.pdf

Response to ODNR and USFWS Comments.pdf

USFWS Comments Consult Form CUY-14-6.93 PID 104132.pdf



Wetland Finding.pdf

Other Resources

Urbanized Area Map.pdf

Water Source Protection Area Map.pdf

Well Log Data.pdf

Section 4(f)

City of Cleveland OWJ Concurrence.pdf

Metroparks OWJ Concurrence.pdf

OES Recreational 4(f) Determination - Re-Evaluation.pdf

OES Recreational 4(f) Determination.pdf

Revised OWJ Letter Signed by Cleveland.pdf

Section 6(f)

Informal Consultation with ODNR.pdf

LWCF Grant Listing.pdf

ODNR Comments.pdf

OES Approval - Maintenance Re-Evaluation.pdf

OES Approval - Maintenance.pdf

Public Involvement

Press Release.pdf

Public Comment Form .pdf

Public Involvement Summary and Conclusion Statement.pdf

Public Notification Mailing List.pdf

Public Opportunity to Comment Letter.pdf

Response to Public Comments Table.xlsx

Stakeholder Comments Garfield Heights no Emergency Call box.pdf

Permits

FEMA FIRM.pdf

Floodplain Impacts ODOT Website.pdf

Letter of Compliance - ODOT Form LD-51.pdf

Local Floodplain Administrator Approval.pdf

Environmental Commitments

C2 Approval and Commitments to PM.pdf