



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 04
2088 SOUTH ARLINGTON RD. • AKRON, OH 44306 • 330-786-3100

Environmental Document

for

ATB CR 343 00.31 (Graham Rd) PID 117485

Environmental Document Level: C2

Approved: 5/23/2023

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ODOT DISTRICT 4

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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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C2

PID: 117485
Project Sponsor: ASHTABULA COUNTY ENGINEER
ODOT District: 4
Funding Source: Federal

Project Description:

The Ashtabula County Engineer proposes to improve the two-lane Graham Road (County Highway 343) bridge over the West Branch of the Ashtabula River in rural Pierpont Township, Ashtabula County. Inspection results show that repairs are needed due to age and deterioration. The existing bridge is a 66-foot long, 24-foot-wide concrete box beam structure with concrete abutments.

The superstructure of the bridge will be replaced with steel beams and a concrete deck. The bridge will be widened by 4 feet to 28 feet wide to meet modern design standards. The length of the bridge will remain the same. Instream work is limited to installation of rock channel protection to protect the exposed bridge footers and the removal of two former metal bridge piers from the stream bottom. Additional improvements proposed by this project include roadway approach pavement resurfacing, installing aggregate shoulders, new bridge railings and roadway approach guardrail, adjacent driveway repairs, and various pavement marking applications.

Mapping that depicts the project on a United States Geological Survey (USGS) 7.5-Minute Topographic Quadrangle Map is included in Project File/General/Project Information as USGS Quadrangle Topographical Map.pdf.

The bridge will be closed to traffic during construction for up to 90 days. The bridge closure and detour will be posted in the project vicinity prior to the start of project construction. Access shall be maintained to all adjacent private properties during project construction. Substantial traffic disruptions are not expected during project construction.

The project will be constructed within the existing roadway right-of-way.

Existing utilities within the project study area will not be impacted/relocated to construct the project.

A Cultural Resources Records Check and project information were submitted by email to ODOT-Office of Environmental Services (OES)-Cultural Resources staff for review. The literature search concluded there are no inventoried buildings (OHI), no known archaeological sites (OAI), and no listed or eligible historic properties found in the area of potential effects (APE). The adjacent, relocated Graham Road Covered Bridge, eligible for inclusion in the National Register of Historic Places (NRHP), is well removed from the construction limits of the undertaking and APE. The Graham Road bridge over the West Branch of the Ashtabula River is not considered eligible for the National Register based on the Ohio DOT Historic Bridge Inventory (accepted April 28, 2010). The replacement of non-historic bridges and roadway upgrades limited to the existing operational right-of-way are activities that are exempt from further cultural resource consideration by the November 8, 2017 Cultural Resource PA (Agreement 19319), as long as the project is not within the boundaries of any historic property or N. R. district. In accordance with Stipulation V(C)(1) and Appendix B of the Section 106 Programmatic Agreement executed on November 8, 2017 (Agreement No. 19319), amended on July 11, 2019, ODOT-OES determined the project is a type of undertaking that has 'minimal potential to cause effects' to historic properties and is not a part of a larger undertaking. See the cultural resources documentation for the project in the Project File/Cultural Resources/Project Information subsection and the Cultural Resources Tab.

The bridge is adjacent to Graham Road Covered Bridge Metropark. Graham Road Bridge is a covered bridge that formerly spanned the West Branch of the Ashtabula River. Built from remnants of a former covered bridge that was damaged in a flood in 1913, the bridge now sits as an Ashtabula County Metropark along the south side of Graham Road, near its original site, and is a single span Town truss design. The bridge was relocated in 1971. Parking is limited to an unpaved roadside shoulder area along Graham Road with room for a few vehicles. No restrooms, water, or electric are provided. ODOT-OES determined the undertaking has minimal potential to cause effects to historic properties in accordance with the Section 106 Programmatic Agreement (Agreement No. 19319) executed November 8, 2017, and amended July 11, 2019. No new permanent right-of-way from a historic property will be acquired and no contributing elements of a historic property will be removed or altered by construction. Therefore, in accordance with 23 CFR Part 774, the undertaking ATB-CR 343 00.31 (Graham Road) will not result in the use of a Section 4(f) cultural resource. See the Cultural Resource Section 4(f) documentation for the project in the Project File/Section 4(f)/Coordination subsection.

Access to Graham Road Covered Bridge Metropark will be maintained with the exception of up to two days when park access may be limited by the contractor due to crane lifts for bridge beam placement. Access restrictions to the park involve prohibiting the use of the unpaved roadside shoulder area used for parking for park visitors due to safety issues and equipment access needs. ODOT



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completed Section 4(f) coordination with Ashtabula County Metroparks as the Official with Jurisdiction. The measures to minimize harm have been incorporated into the plans as plan notes and as environmental commitments. A Section 4(f)/6(f) Determination Request Form for Recreational Properties (DRF) was submitted to ODOT-OES Policy Staff. Based upon review of the DRF it was determined the continuity of access to the Graham Road Ashtabula County MetroPark will be maintained. Therefore, the proposed project can be processed as an exception to the requirement for Section 4(f) approval in accordance with 23 CFR 774.13(f)(3). The determination was made based on the proposed scope of work and concurrence received from the Official with Jurisdiction (OWJ) in regard to the assessment of impacts that are included in the DRF. See the Recreational Section 4(f) documentation for the project in the Project File/Section 4(f)/Coordination and Reports subsections.

Based on the information in the Regulated Materials Review (RMR) Form completed for the project, further RMR activities or special materials management are not warranted for the project. See the RMR documentation for the project in the Project File/ESA/Reports subsection.

A Level 1 Ecological Survey Report was completed for the project due to 70 feet of impact to the West Branch of the Ashtabula River and potential impacts to endangered bat species from tree cutting. All trees in the project limits were cut by March 31, 2023 to avoid impacts to bats. During the mussel reconnaissance survey, one fat mucket mussel was found. With the stream substrate dominated by bedrock, the mussel was likely washed downstream from an upstream location. There is no habitat for mussels within the project area. The Ohio Department of Natural Resources stated that ODOT District 4 Environmental staff will conduct a second reconnaissance survey for mussels in Spring 2023 in the West Branch Ashtabula River. A full survey and relocation (if necessary) of mussels will be conducted prior to the start of instream construction activities. The project will have no other impacts to ecological resources. The Level 1 Ecological Survey Report was non-notifying to resource agencies. See the ecological documentation for the project in the Project File/Ecological/Coordination and Reports subsections and the Ecological tab.

The West Branch of the Ashtabula River in the project limits is a State Scenic River. The project was coordinated with the ODNR Scenic River Coordinator with the Scenic River Field Review (SRFR) form. A field review occurred on April 20, 2023 with the ODNR Scenic River Coordinator and staff from ODOT District 4 and the Ashtabula County Engineer's office. ODNR provided comments on the SRFR form that are environmental commitments. See ODNR Scenic River coordination for the project in the Project File/Ecological/Coordination subsection.

ODOT District 4 Environmental Section personnel reviewed the FEMA FIRM for the project study area and determined the project is located within designated Special Flood Hazard Area (SFHA) Zone A. The Ashtabula County Engineer's office will obtain the floodplain permit, if necessary, prior to construction. See the floodplains documentation for the project in the Project File/Permits/Floodplains subsection.

The project will not impact any other environmentally sensitive resources within the project study area.

The Ashtabula County Engineer's office conducted various public involvement activities for the project, including creation of a website with project details and public commenting information, issuance of a news release, emergency/public services contact activities and letters to nearby property owners. One public comment was received by phone involving the timing of construction and bridge details and a response was provided in the phone call. A news article regarding the project was published in the local *Jefferson Gazette* news outlet. See the public involvement documentation, including the received comment and response to comment, for the project in the Project File/Public Involvement/Project Information subsection.

The environmental document and associated studies, as applicable, were approved using the Stage 3 Design plans for the project. A copy of the Stage 3 Design plans for the project is included in the Project File/General/Project Information subsection as Stage 3 Design.pdf.

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

Yes

Ellis STIP Details

Phase	Current STIP Reference
PE Environmental	117485: 21-24 STIP
Construction	117485: 21-24 STIP
PE Detailed Design	

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 -

1. a. Acquisition of more than a minor amount of right-of-way
2. b. Residential or non-residential displacements
3. c. A Coast Guard, Individual Section 404 and/or a Section 10 permit
4. d. A Section 106 finding of *Adverse Effect*
5. e. A Section 4(f) Programmatic or Individual Evaluation
6. f. A finding of *May Affect, Likely to Adversely Affect* to Threatened and Endangered Species
7. g. Construction of temporary access, or the closure of existing road, bridge, or ramps, that would result in major traffic disruptions
8. h. Changes in access control
9. 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)
10. 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
11. k. No minor public or agency controversy on environmental grounds (no opposition from any organized groups or agencies and no unresolved environmental coordination)
12. l. If an EJ Analysis Report is required, the project must be processed as a D-level CE or higher level document

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.

Waterways:	Present; No Coast Guard, Individual 404, and/or Section 10 Permit required
Waterways Permit Type:	Permit Determination and/or Permit Application Approval Pending
Isolated Wetland Permit	No
Will any wetlands be impacted?	No
Endangered Species:	Present; No finding of May Affect, Likely to Adversely Affect
Endangered Species - Coordination	No Effect
100-Year Floodplain:	Encroachment Within the SFHA is a Functionally Dependent Use
EO 11988/NFIP Coordination and Documentation Completed:	Yes
NFIP Local Floodplain Coordinator Notification Date:	04/18/2023



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Section 4(f):

Present; No Programmatic
Evaluation or Individual Evaluation
Required

Section 4(f) Determination:

Trails, Paths, Bikeways, and Sidewalks Exception - 774.13(f)

Section 4(f) Determination Date - 774.13(f)

05/04/2023

Section 6(f):

Not present

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**

04/13/2023

Since no Tribe was interested in this project based on their customized preferences, no further Tribal consultation was conducted.

Projects that meet C2 criteria are not anticipated to have impacts to the following environmental resources. If resources are present, documentation is only required if there is a potential for impacts.

Air Quality:

Studies Not Required

Air Quality - Coordination with OES:

No

Noise:

Studies Not Required

Noise Coordination - OES Approval Date:

Hazardous Materials - ESA Screening Conducted

Yes

Hazardous Materials - OES Approval Date:

05/15/2023

Phase I ESA Warranted Based on Coordination with OES:

No Further Studies Warranted

Farmland:

Non-Urbanized Area; No Impacts in
Accordance With the Farmland
MOU, 7 CFR 658, and ORC 929.05

Scenic Rivers

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

Projects that meet C2 criteria must be in accordance with ODOT's EJ Guidance and activities conducted for Public Involvement are commensurate to the project's type and scope of work.

Environmental Justice Populations

Present; No EJAR Required, Does
Not Exceed EJ Guidance Criteria,
and No Issues Raised During Public
Involvement

Identified Environmental Justice Populations



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Census Block Group #	% Minority	% Low Income
390070012005	2	78

Environmental Justice Remarks

The proposed project will have no changes to access or relocations and no disproportionately high and adverse effects to minority or low-income populations. No concerns related to impacts on Environmental Justice populations were raised as a result of public involvement activities conducted as part of the proposed project. Therefore, in accordance with the protections of Executive Order 12898, no further analysis is required. See Environmental Justice documentation for the project in the Project File/Environmental Justice/Project Information subsection.

Public Involvement:

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

Environmental Commitments

Yes



Environmental Commitments

C2

- 1) ODOT District 4 Environmental staff will conduct a second reconnaissance survey for mussels in Spring 2023 in the West Branch Ashtabula River. A full survey and relocation (if necessary) of mussels will be conducted prior to the start of instream construction activities.
- 2) The project is located within the known habitat ranges of the federally listed and protected Indiana bat and northern long-eared bat. Trees shall not be removed under this project from April 1 through September 30. All necessary tree removal shall occur from October 1 through March 31. This requirement is necessary to avoid and minimize impacts to these species as required by the Endangered Species Act. For the purposes of this commitment, 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. The Ashtabula County Engineer's office will cut trees in the project limits prior to April 1, 2023.
- 3) The Project Designer shall incorporate the following note into the plans: The Contractor shall not work below the ordinary high water mark of West Branch Ashtabula River, or install, modify, or remove any existing instream fills during the ODNR instream work restriction period of April 15 to June 15 unless a waiver is approved by ODNR and verified by the USACE.
- 4) The project is located within a FEMA flood zone and will be designed to comply with all applicable Local, State, and Federal floodplain protection standards. Appropriate floodplain permitting shall be obtained prior to the start of construction. The Ashtabula County Engineer's office will obtain the floodplain permit, if necessary, and the contractor shall adhere to all appropriate permit conditions during construction.
- 5) This project is within 1,000 feet of a state designated wild, scenic, or recreational river. If necessary, coordination will occur following the Scenic River MOA Between ODNR and ODOT (No.11323), and documentation will be included in project file.
- 6) The Project Designer shall incorporate the following note in the plans: The Contractor shall not discharge toxic or hazardous materials such as sealants, paint, solvents, cleaning agents, earthen materials, waste-water, fuels or debris of any kind to the West Branch Ashtabula River, its tributaries, or drainage ways. If refueling of immobile equipment is necessary within the floodplain or near any tributary drainage ways, ditches, or stream, the contractor shall provide secondary containment with enough capacity to completely contain and collect all potential liquid wastes in the event of a spill.
- 7) The Project Designer shall incorporate the following note to the plans: Any and all construction debris, earthen debris, excess asphalt or concrete, wood debris from clearing, excess fill material, and trash should be disposed of at an approved upland site or land fill above FEMA 100-year flood elevations. Disposal of any such materials within 1,000 feet of the West Branch Ashtabula River is prohibited.
- 8) The Project Designer shall incorporate the following note to the plans: In accordance with ORC 3750.06, reportable spills must be reported to the local fire department (911), the local emergency coordinator (440-576-9148), and the Ohio Spill Line (800-282-9378).
- 9) The Project Designer shall incorporate the following note in the plans: The Contractor shall keep all idle equipment, fuels, lubricants, and any storage for/of potentially toxic or hazardous materials out of the FEMA designated special flood hazard area and not within 1,000 feet of the West Branch Ashtabula River.



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10) The Project Designer shall incorporate the following note into the plans: The Contractor shall notify the Project Engineer 40 days prior to work within 1,000 feet of the West Branch Ashtabula River. The Project Engineer shall notify the District Environmental Coordinator 35 days prior to work within 1000 feet of the scenic river. The District Environmental Coordinator shall coordinate with ODNR Scenic Rivers a minimum of 30 days prior to any work within 1,000 feet of the West Branch Ashtabula River.

11) If any vegetation removal other than mowing, tree trimming, brush removal, or herbicidal spraying will occur, the DEC and Scenic River Manager must conduct a field review and complete a Scenic River Field Review Form. The Project Designer shall incorporate the following note in the plans: When cutting and clearing of any vegetation within 1,000 feet of the West Branch Ashtabula River, the Contractor shall limit the amount of vegetation being cleared to the absolute minimum necessary to accomplish the goal of the project. Vertical pruning of trees is permitted if any overhanging limbs cause a safety hazard or obstruct view. The Contractor shall not use a flail mower for vertical pruning. The Contractor must avoid girdling or scuffing tree trunks.

12) The Project Designer shall incorporate the following note in the plans: If any painting, welding, sand and/or water blasting (cleaning) at or over the West Branch Ashtabula River, then the Contractor shall utilize appropriate aprons to provide for complete containment of all paint, welding slag and/or sealant over spray and other debris. Aprons, appropriate falsework, or other barriers shall be utilized on all deck replacement projects to prevent the discharge of concrete, asphalt or other debris to a designated scenic river. All debris collected shall be disposed of at an approved upland site or land fill above FEMA 100-year flood elevations. Disposal of any such materials within 1,000 feet of the West Branch Ashtabula River is prohibited.

13) The DEC must conduct a joint field review with the Scenic River Manager and complete a Scenic River Field Review Form. The Project Designer shall incorporate the following note in the plans, identify areas to be planted that consider setbacks for clear zones and safety, specify which native tree species shall be planted, and include pay items for native seeding and tree planting. A list of native tree species is located at

http://www.dot.state.oh.us/Divisions/Planning/Environment/Ecological_Resources/Permits/Ecology/Documents/TechnicalGuidance/TreesList.pdf: The Contractor must make all reasonable attempts to disturb the minimum amount of river bank vegetation. Disturbed stream banks shall be re-vegetated, returned to previously existing contours and elevations, and any trees removed to perform the work shall be replaced with native tree species, where physically practicable. Native tree species as specified in the plans shall be planted at a density of 400 trees per acre with a spacing of approximately 10 feet on center. Seeding and/or mulching must occur immediately following project completion.

14) ODOT shall ensure the following is addressed in the Waterway Permit Special Provisions or other contract documents if the Special Provisions are not applicable: Fill material used below OHWM of the West Branch Ashtabula River shall be relatively free from fine particulate matter and free from toxic contaminants other than in trace quantities and shall be kept to the minimum amount necessary. Broken concrete or asphalt are specifically prohibited from use as fill below the OHWM or on any portion of the scenic river stream banks. Applicable in-stream work restriction dates will be incorporated into the Special Provisions or scope of work.

15) The Project Designer shall incorporate the following note in the plans: The Contractor shall make every attempt to work from the bridge decks to place RCP around the structure and to use the minimum amount of RCP necessary to prevent scour. New or used concrete or asphalt are specifically prohibited from use as fill below the OHWM or on any portion of the scenic river stream bank.

16) ODOT shall ensure the following is addressed in the Waterway Permit Special Provisions or other contract documents if the Special Provisions are not applicable: The Project Designer shall incorporate the following note in the plans: Access to the channel shall be confined to one stream bank whenever possible. The stream bottoms and banks affected by the causeway and access fills will be restored to its pre-construction elevations.



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17) The project designer shall incorporate the following note in the plans: The Contractor shall not discharge wastewater of any kind into the West Branch Ashtabula River or any of its tributary streams, drainage ways, or ditches. If dewatering is necessary to facilitate in-stream work or pier construction, pump all wastewater onto a vegetated area a sufficient distance from the river to allow for complete infiltration. If discharge to a vegetated area is not feasible, then wastewater shall be discharged into a sediment filter bag or into a temporary detention/retention pond or appropriate sediment control with a sufficient retention period that permits the settling of all suspended solids. The Contractor shall pump all water to an area within the project limits or an area cleared by the Contractor.

18) The Project Designer will add the following note to the plans: The Ashtabula County Engineer's office shall set up a site visit with ODOT District 4 Environmental staff and ODNR Assistant Regional Scenic River Manager, Jeffry Hayes, prior to commencement of the project. ODNR shall be kept apprised of any changes to the workplan. Prior to project completion, the Ashtabula County Engineer's office will schedule a completion inspection date with ODOT District 4 Environmental staff and ODNR Assistant Regional Scenic River Manager, Jeffry Hayes and to visit the site upon completion.

19) The Ashtabula County Engineer's office will investigate installing West Branch Ashtabula River Scenic River signs on both approaches to the bridge and a sign on the upstream side of the bridge with the road name, stream name, and river mile.

20) The following measures to minimize harm from the project Section 4(f) coordination will be incorporated into the plans as plan notes by the Project Designer: 1) Access to Graham Road Covered Bridge Metropark shall be maintained at all times, except for the time needed to temporarily occupy the property, which shall be less than the time needed for construction of the project; 2) Appropriate signage shall be installed to alert users of Graham Road Covered Bridge Metropark of construction activities, access restrictions or closures, and to direct users to secondary access points; and 3) The contractor shall be required to closely coordinate the construction schedule involving Graham Road Covered Bridge Metropark with the Ashtabula County Engineer's office and Ashtabula County Metroparks, as appropriate.



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Preparers and Approvals

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Supporting Form Preparer(s): Jeffrey Cutler
Robert Lang

Approvals & Electronic Signatures

Approved & Electronically Signed By:	Approval Date:
Edward Deley (PROGRAM ADMIN 3)	5/23/2023



Appendix

General

Aerial Map.pdf

County Map.pdf

Project Description Continued.docx

USGS Quadrangle Topographical Map.pdf

ESA

Regulated Materials Review Form.pdf

Cultural Resources

Minimal Potential to Cause Effect - Appendix B

Ecological

ODNR Comments - Mussel recon (email).pdf

ODNR Scenic River MOA Conditions

Scenic River Field Review Form.pdf

USFWS/ODNR Ecological MOA Conditions

Section 4(f)

OES Recreational 4(f) Determination.pdf

Environmental Justice

Census Mapping.pdf

Public Involvement

Emergency and Public Services Notification.pdf

News Article Jefferson Gazette.PDF

Press Release.pdf

Property Owner Notification Letter.pdf

Public Notification Mailing List.pdf

Response to Public Comments.pdf

Website Posting.pdf

Permits

Coordination with Local Floodplain Administrator.pdf

FEMA FIRM.pdf