



OHIO DEPARTMENT OF TRANSPORTATION

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

Environmental Document

for

CUY Eagle Avenue Bridge PID 118527

Environmental Document Level: D2

Approved: 1/19/2024

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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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Project Type

Please check all of the following actions that apply (Must check at least one):

(13) Actions described in 23 CFR 771.117 (c)(26), (c)(27), and (c)(28) that do not meet the constraints listed in 23 CFR 771.117(e).

(a) Project types that exceed thresholds in Appendix A

(b) Project types that exceed thresholds in Appendix B



General Project Information

Project, Cost Schedule and Work Limits

Environmental Document Level:	D2
PID:	118527
Project Name:	CUY Eagle Avenue Bridge
Project Sponsor:	Cleveland, City of
ODOT District:	12
Funding Source:	Federal
The next phase of the proposed project is listed on the STIP	Yes

Ellis STIP Details

Phase	Current STIP Reference
CO	118527: 24-27 STIP

An Interchange Modification/Justification/Operations Study (IMS/IJS/IOS) was completed No

Project Description:

The City of Cleveland proposes to remove the Eagle Avenue bridge over the Cuyahoga River in Cleveland. The purpose of this project is to address the poor condition of the bridge and associated safety issues.

The City of Cleveland, with the assistance from the Ohio Department of Transportation (ODOT), evaluated four alternatives to address the poor condition of the bridge. The four alternatives include: (1) removal of the existing structure, (2) stabilization of the existing structure, (3) removal and relocation of existing structure for use as non-movable bridge, and (4) full replacement of the structure to become operational. After further analysis, the recommended alternative is alternative 1, removal of the existing bridge. Additional work includes the installation of a guardrail or barrier at the river's edge following the bridge removal.

All work will take place within the existing right-of-way. Eagle Avenue is currently closed to traffic and will remain closed during construction. No new detour is required. Traffic on Scranton Road, Carter Road, Stones Levee, and the Ohio & Erie Towpath Trail, shall remain open at all times. Also, the pedestrian traffic shall be maintained at all times.

The Ohio & Erie Towpath Trail in the project area is recognized as recreational property and is afforded protection from adverse impacts associated with federal-aid transportation projects. It is anticipated that the project will require temporary closure of the trail with a short detour in the vicinity of the project area. Other environmental impacts are anticipated due to this project including minor river impacts.

The Eagle Avenue bridge is the first vertical lift bridge in Cleveland and is eligible for listing on the National Register of Historic Places (NRHP). Removal of the bridge will have an adverse effect on the historic bridge.

Limits of Proposed Work: Cleveland; Over the Cuyahoga River



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Start (SLM): NA
 End (SLM): NA
 Total Work Length (Miles): 0.06

No roadway data for PIDs associated with this CE Form

Sufficiency Rating: 028.0
 General Rating: 2
 Date Built: 07/01/1930
 Bridge Location: E OF SCRANTON AVE (FLATS)
 40. Bridge Type: 315N

Design Criteria For Bridges

SFN: 1869604

Sufficiency Rating: 028.0
 General Rating: 2
 Date Built: 07/01/1930
 Bridge Location: E OF SCRANTON AVE (FLATS)

	Existing:	Proposed:
Bridge Type:	315N	N/A
Bridge Length (ft):	312	N/A
Number of Main Spans:	3	N/A
Max Span Length (ft):	224	N/A
Load Restrictions (TON):	0	N/A
Curb to Curb Width (ft):	39.20	N/A
Shoulder Width(ft):	N/A	N/A
Under Clearance (ft):	N/A	N/A

Bridge Type Description:

Eagle Avenue Bridge is over Cuyahoga River in the City of Cleveland between Stones Levee and Scranton Road. It is the first of its type in Cleveland and sixth in the U.S. The bridge was designed by the architect FL Gorman / WH Suloff. The Eagle Avenue Bridge was originally constructed for vehicular traffic in 1930-31 and it is owned by the City of Cleveland. It was a component of the Eagle Avenue Viaduct built in 1928. The Viaduct provided automobile and pedestrian crossing over the Cuyahoga River freight channel. The vertical lift bridge consists of two towers and a central 224' vertical lift Pennsylvania (Petit) truss span. This is a classic Waddell-design with the battered built-up steel towers, concrete counterweights, and operators house perched in the center of the span. The bridge has been closed to vehicular traffic since 2005 when the Eagle Avenue Viaduct was removed.



Load Restrictions Description:

N/A - Bridge is closed to all pedestrian and vehicular traffic.

Will the structure be rehabilitated or replaced as part of the project? No

If this bridge is a historic bridge, what type is it? Vertical Lift Bridge

Remarks:

The bridge is the first vertical lift bridge in the City of Cleveland. It was built in 1930-31. The bridge is eligible for listing on National Register of Historic Places (NRHP).

41. Bridge Length (ft): 312

42. Number of Main Spans: 3

43. Max Span Length (ft): 224

44. Load Restrictions (TON): 0

45. Curb to Curb Width (ft): 39.20

Maintenance of Traffic During Construction

A roadway, bridge or ramp closure is required No

A temporary bridge or roadway is proposed No

A detour is required for the proposed project No

The proposed MOT substantially impacts sensitive environmental resources No

Substantial controversy is associated with the proposed MOT No

Coordination has been initiated and/or completed with local emergency services, schools, public institutions/facilities, etc. Yes

Remarks:

All the work in the proposed project will take place within the existing right-of-way. The bridge is closed to traffic. Traffic will be maintained on Scranton Avenue. No detour is required for vehicular traffic. Trail traffic will utilize a short detour in the vicinity of the project.

Are there any Environmental Commitments? No

Right of Way and Utility Involvement

The project requires Permanent Right-of-Way No

The project requires Permanent Easement(s) No

The project requires Temporary Right-of-Way No

Number of parcels impacted by Permanent Right-of-Way: N/A

Number of parcels impacted by Temporary Right-of-Way: N/A

Approximate acreage of Permanent Right-of-Way needed: N/A



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Approximate acreage of Temporary Right-of-Way needed:	N/A
Electrical lines, gas lines, water lines, sewer lines, phone lines or other utilities exist in the project area	Yes
Large scale transmission facilities are located within the project area	No
Private utility easements are located within the project area	No
Coordination with identified utilities has been initiated and/or completed	Yes

Remarks:

EL Robinson Engineering conducted coordination with utility companies and received responses in June/July 2023. Cleveland Public Power provides electrical service to the bridge and has committed to disconnection by June 2024. Other utilities will have no conflicts. Details are provided in the project file at *General\Right of Way and Utility Involvement\Utility Contact List.pdf*.



Purpose & Need

Purpose & Need

Project History:

The Eagle Avenue lift bridge (built 1930-31) was a component of the Eagle Avenue Viaduct (built 1928), providing automobile and pedestrian crossing of the Cuyahoga River freight channel. The Viaduct consisted of an extensive series of spans providing grade separation for rail line crossings and access to the higher ground of Downtown Cleveland at Ontario Street. Eagle Avenue provided the most direct route up the 65-foot elevation of the riverbanks for goods arriving in The Flats of the Cuyahoga River to be transported to the Haymarket District. The bridge was the first vertical lift bridge in the City of Cleveland and is eligible for the National Register of Historic Places. It has a 187-foot-long lift span flanked by approach spans and is a classic Waddell-design with battered built-up steel towers, concrete counterweights, and an operator's house situated in the center of the lift span. The bridge was reconstructed/rehabilitated in 1991.

ODOT removed most of the Eagle Avenue Viaduct in 2005, leaving the lift bridge in place while retiring it in the raised position. There is no roadway connecting to the bridge approach spans that are higher than the adjacent ground elevation. The U.S. Coast Guard requires the bridge to remain in the raised position to allow passage of lake freighters. Fines are assessed per occurrence of blocked freighter traffic. In addition to freighter traffic, the Cuyahoga River is used at Eagle Avenue by recreational boaters and rowing crew teams. The bridge has not received maintenance since the 2005 closure.

Euthenics, Inc. personnel performed a Fracture Critical Member field inspection of the bridge on October 4 through October 8, 2021. This inspection resulted in an overall General Appraisal Rating of 2 (Critical Condition). The Bridge Inventory and Appraisal Form indicates this structure is scheduled for a Fracture Critical inspection every 12 months and a Special Inspection every 60 months (5 years).

Purpose Statement:

The purpose of this project is to address the structural deficiencies of the Eagle Avenue Bridge and the safety issues related to those deficiencies, in a manner that is safe for the public and workers implementing the project, without long-term disruption to river traffic.

Need Element(s):



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Structural deficiencies: The most recent bridge inspection identified the structure as being in Critical condition, with the gusset plates on the West Tower and the Verticals/Diagonals in the North Truss of the Lift Span controlling the rating. The exterior gusset plate at Panel Point D, North side of the West Tower is torn through and has lateral distortion indicating that lateral deflection of the tower is taking place. The inspection report indicates "widespread general corrosion and paint failures of the members and gussets" of the West and East Towers in addition to nearly complete section loss of several tower elements. See Photos 12-18 of the inspection report for examples of the deterioration. The East Tower has an interior gusset plate at Panel Point F that is "holed through," which controls the rating for the tower. Additionally, the top angle member D'-D' is kinked in two locations, which may be signs of localized buckling due to lateral deflection.

On the Lift Span, Lower Chord members of the South Truss are in Poor condition, with several horizontal channels missing lower flanges or experiencing detached lower flanges for 40-90% of a section. See Photos 32-42 of the inspection report for examples. The Verticals and Diagonals of the North Truss are in Critical Condition, with the bulk of them having critical section loss at the deck. Pages 36-37 of the inspection report tabulate the amount of section loss for the concerning members.

The inspection report indicated that lateral (wind) forces acting on the towers are tearing isolated gusset plates, which has the potential to cause collapse of the tower in a major wind event, while the advanced section loss of the North truss verticals and diagonals at the bridge deck interface creates the possibility of collapse of the lift span. The inspection report states that the structure requires action to address the conditions that threaten collapse. In its current state, the structure cannot service traffic.

These issues contributed to an overall bridge rating of 2; the ratings scale ranges from 0-9, where 9 is like new and 0 is out of service. A rating of 4 or less is considered deficient.

Safety: The structure spans a U.S. Coast Guard regulated shipping channel, which means a potential lift span collapse could endanger lives and impede the movement of commercial traffic along the Cuyahoga River. Appendix B of the bridge inspection report contains the electrical lighting and mechanical support machinery inspection report prepared by Wiss, Janney, Elstner Associates, Inc. (WJE). This document indicates the span locks are not currently engaged and therefore are not contributing to maintaining the elevated position of the span. It appears that the span drive machinery is being used to hold the lift span in place. In the absence of routine maintenance including lubrication, the wire ropes of the machinery will deteriorate due to progression of erosion from environmental exposure. Failure of an operating rope can compromise control and position of the lift span with no ability to return it to the full raised position. The WJE report also indicates that the architectural lighting system is in poor condition, with approximately 30% of the lighting fixtures illuminating when controlled by what is assumed to be a time clock.

There is evidence of trespassers crossing the locked gates and concrete barriers placed to prohibit use of the bridge, including climbing the towers and accessing the operator's control house located in the center of the elevated lift span. There is graffiti on counterweight members at the top of the bridge towers, and a photo shows an empty beer bottle left in the sheave of one counterweight. The operator's control house has been excessively vandalized and the electrical power and control equipment has been damaged and/or ransacked. The Towpath Trail at Tremont's northern terminus and make-shift parking lot is at the west approach of the bridge, making the location very accessible to curiosity-seekers. The reduced architectural lighting on the bridge makes it easier for trespassers to climb the bridge after dark. See photos of this vandalism in the Project File.

Goals and Objectives:

N/A

Summary Statement:

N/A

Logical Termini and Independent Utility:

The logical termini for this project are limits sufficient to consider the range of alternatives to address the structurally deficient Eagle Avenue Bridge. Due to the lack of roadway connections to the bridge, the study area is the bridge and adjacent land on each end from Stones Levee Road on the east and Scranton Road on the west. The project is independent of any other transportation project in the area and is not part of any system linkage or long-range development or transportation improvement plan. Therefore, the project has independent utility.



Alternatives

Alternatives

Discuss No Build Alternative:

The No Build Alternative would maintain the bridge in its existing configuration and no improvements other than planning for routine maintenance. This alternative does not satisfy the Project's purpose and need because it would not address the safety issues related to the structural deficiencies of the bridge that require action to prevent the threat of the bridge collapse.

Was a Feasibility Study completed?

No

Was an Alternative Evaluation Report (AER) completed?

No

Alternatives Considered

Name	Description	Reason Dismissed	Preferred Alternative
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<p>Alternative #1: Demolition of existing structure</p>	<p>A complete removal of bridge superstructure (i.e., removing of the lift span and towers) while keeping existing substructure and tower foundation in place. This alternative would cost approximately \$3.1 million. During demolition, a barge to be temporarily placed in the channel to receive the lift span as it is lowered from the towers and then floated off site. Temporary structure will be constructed in order to support the removal of the towers and associated mechanisms. The benefit for this alternative is that the cost is low and no construction or demolition work will be needed in the shipping channel. The drawback is that the historic structure is not saved.</p>	<p>N/A</p>	<p>Yes</p>
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<p>Alternative #2: Stabilization of the superstructure and towers</p>	<p>Steels repairs would be performed to stabilize the structure in the upright and lifted condition. The cost of this option is \$9.3 million. The structure would remain closed to traffic. A system for locking the bridge in place is required to safely keep the lift span in the "up" position; hence, ongoing maintenance would be required. The benefit of this alternative is that the historic structure stays in place. The drawback is that the ongoing maintenance is required to keep the structure stable and the bridge will not be open for traffic.</p>	<p>On going maintenance is required to keep structure stable, and bridge will not be open to traffic. Bridge stability would be re-evaluated every 10-15 years.</p>	<p>No</p>
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<p>Alternative #3: Removal, repair, and relocation for use as non-movable truss bridge</p>	<p>A complete removal of bridge lift span and towers but would keep the existing substructure and tower foundations in place. The bridge truss would be salvaged off-site and re-utilized as a non-movable truss bridge. The cost of this option is \$29 million but could be more depending on unforeseen conditions encountered during construction. During demolition, a barge would be temporarily placed in the channel to receive the lift span as it is lowered from the towers and the floated off site for removal. The benefits for this alternative are that no construction and demolition work occurs in the shipping channel and the Historic bridge is salvaged off site. The drawback for this option is the high cost.</p>	<p>Increase in the demolition cost, which will increase the project costs by both removing and repairing the lift span.</p>	<p>No</p>
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<p>Alternative #4: Replacement of superstructure, towers, and East Approach</p>	<p>A complete removal of bridge lift span and towers, keeping the existing substructure and tower foundations in place, while providing a new lift span, foundations, towers, and mechanical / electrical system. The vertical profile of the bridge would be modified to allow the east approach to match West 3rd Road at grade. Currently the East Approach is 20 feet above grade since the bridge was part of the Eagle Ave Viaduct that has been removed. The cost of this option is \$58.9 million. The benefit for this alternative is that the bridge can be operational and provide a direct route between downtown and the Scranton Peninsula. The drawback are the historic structure will be removed, ongoing maintenance will be needed, and the project cost is high.</p>	<p>The project cost is high and historic structure will be removed.</p>	<p>No</p>
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Discuss Reasons Alternative Identified as Preferred was selected:



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The recommended preferred alternative is Alternative #1: Demolition of the existing structure. This option has the lowest cost of the feasible alternatives. It meets the purpose and needs of the project and minimizes impacts to the shipping channel. This alternative also offers the lowest future maintenance costs.

The key benefits associated with this option are:

- No construction and demolition work will occur in the shipping channel.
- The project cost is low comparing to the other alternatives.



Air

Mobile Source Air Toxics (MSATs)

Sensitive Areas are located within approximately 500' of the proposed project area Yes

The proposed project is listed as a C1 in ODOT's CE Guidance and/or falls under 40 CFR 93.126 Yes

Remarks:

The project does not add capacity, a new interchange or a new road on new alignment. This project only slightly modifies an existing alignment. Hence this project will not result in any meaningful changes in traffic volume, vehicle mix, location of the existing facility, or any factor that would cause an increase in emissions impacts relative to the no-build alternative. The project is exempt under 40 CFR 93.126 - Exempt Projects, Safety: Projects that correct, improve, or eliminate a hazardous location or feature. Consequently, this effort is exempt from analysis for MSATs.

Particulate Matter 2.5 (PM2.5)

The proposed project is in an air quality non-attainment or maintenance area Yes

The proposed project falls under 40 CFR 93.126 Yes

Remarks:

The proposed project is in Cuyahoga County which is a PM 2.5 Nonattainment Area. However, this project is exempt from PM 2.5 analysis per 40 CFR 93.126 Exempt Projects, Safety: 'Projects that correct, improve, or eliminate a hazardous location or feature'.

Carbon (CO)

The State of Ohio is in attainment for CO at this time and no coordination or analysis is required

Ozone

The proposed project is in an Ozone non-attainment or maintenance area Yes

The proposed project is listed on the TIP Yes

Remarks:

Cuyahoga County is in an Ozone non-attainment area. Furthermore, the proposed project is in compliance with ozone standards due to the fact the proposed project is listed on the Statewide Transportation Improvement Program (STIP) for FY 2024-2027 and the Northeast Ohio Areawide Coordinating Agency (NOACA) Transportation Improvement Program (TIP). Additionally, the design concept and scope have not changed significantly since the project's inclusion on the STIP in accordance with 40 CFR 93.115. Therefore, no further coordination is required.



Greenhouse Gas

A Quantitative Greenhouse Gas (GHG) Analysis is required

No

Remarks:

A quantitative greenhouse gas analysis is not required.

Environmental Commitments

Are there any environmental commitments? No



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Noise

Noise

Noise Sensitive Areas located within approximately 500' of the proposed project area Yes

Noise Analysis conducted No

The proposed project is a Type I project No

The proposed project is a Type II project No

Remarks:

The proposed project does not qualify as a Type I project for noise (i.e. not adding capacity to thru lanes, not moving thru travel lanes equal to greater than 50% closer to noise sensitive areas) and a noise analysis is not required for the project under 23 CFR 772.

Environmental Commitments

Are there any environmental commitments? No



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RMR

Does the project require any Permanent ROW or Easement? No

Does the project require any temporary ROW? No

RMR Screening was completed by District Staff: Yes

Date when It was completed: 04/03/2023

Remarks:

Lawhon & Associates, Inc. conducted Regulated Materials Review for the project corridor in March 20, 2023, which was conducted in accordance with the Ohio Department of Transportation Office of Environmental Services (ODOT-OES) Regulated Materials Review Manual (2018). As a result of this review, none of the sites warranted further site assessment or special material management. ODOT District 12 concurred with the review and finalized the report on April 3, 2023. RMR reports and coordination letter are available in the Project File under ESA.

Landfills

Is a Rule 513 Authorization required? No

Remarks:

Based upon regulated materials studies conducted by Lawhon & Associates, Inc. there are no landfills located within the project area. No permit is required.

Are there any environmental commitments? No

According to the IOC from OES does the project require any Environmental Commitments (plan notes and/or other coordination)? No



Cultural Resources

Cultural Properties Present

Please describe all of the efforts made to identify Historic Properties (including lit review, field investigation, etc.):

The Ohio Department of Transportation, Office of Environmental Service (ODOT-OES) reviewed the Ohio State Preservation Office (SHPO) data base and identified previously documented history architecture resources within the larger study area. In addition to the Eagle Avenue Bridge [SFN 1869604], eligible for inclusion in the National Register of Historic Place (NRHP), one previously documented resource, Fire Station #21 (1801 Carter Road) [Ohio Historic Inventory CUY0290202], was identified adjacent to the Eagle Avenue Bridge within the area of potential effects.

On April 22, 2023, the project team conducted a field meeting at the bridge. Participants included representatives from the: City of Cleveland; ODOT District12 office; ODOT-OES; and the United States Army Corp of Engineers (USACE) Ohio Regulatory Transportation Office. As a result of the records check, field review, and project scope, ODOT-OES evaluated Fire Station #21 for inclusion in the NRHP. On May 15, 2023, ODOT-OES determined Fire Station #21 was eligible for inclusion in the NRHP.

Is there an eligible or listed NRHP Historic Property in the Area of Potential Effects Pursuant to 36 CFR part 800? Yes

OES Approval/OSHPO Concurrence Date: 06/08/2023

Remarks:

In accordance with 36 CFR 800.5(a) and the Section 106 Programmatic Agreement (*Agreement No. 19319*) executed November 8, 2017, amended July 11, 2019, ODOT-OES has determined a finding of 'adverse effect' is applicable to the undertaking based on the following:

- Removal of the Eagle Avenue Bridge, eligible for inclusion in the NRHP, will result in an adverse effect.
- No contributing features of Fire Station #21, eligible for inclusion in the NRHP, will be removed or altered by the undertaking.
- Impacts to significant archaeological resources are unlikely, based on the lack of known archaeological resources and the level of modern development from both transportation and industrial resources. No further cultural resource investigations are warranted.

Please check all NRHP Eligible and/or Listed resources:

Bridge

Building

What is the Section 106 effect determination in the OES Transmittal? Adverse Effect

Documentation Date



Participating

Does this project have an Adverse Effect on Archaeological resources? No

Does this project have an Adverse Effect on History/Architecture resources? Yes

Archaeological Resource Adverse Effect

History/Architecture Adverse Effect

Date OSHPO Concurred with Adverse Effect determination: 06/08/2023

Date Documentation for Consultation was sent

ACHP: 06/28/2023

OSHPO: 05/15/2023

Is FHWA consultation required? No

Did you contact any other Consulting Parties? Yes

Consulting Parties

Additional Party Name	Documentation Date:
Ohio Historic Bridge Association - Doug Miller	07/18/2023
Carol Poh	05/23/2023
This Old Bridge, LLC - William Vermes	07/20/2023
Dan Witt	08/31/2023
Cleveland Landmarks Commission - Dan Musson	7/10/2023
Cleveland Restoration Society - Margaret Lann	05/25/2023
Canalway Partners - Mera Cardenas	01/03/2023
Cleveland Historic Preservation - C. Montgomery	7/10/2023

Date of Advisory Council on Historic Preservation response: 07/11/2023

Is Advisory Council on Historic Preservation participating? No

Date MOA was executed: 01/04/2024

Tribal Consultation

Tribal Consultation Summary/Remarks:

The following 3 tribes were notified on 5/15/23: Delaware Tribe of Oklahoma; Delaware Nation; and The Shawnee Tribe.

Delaware Nation responded on 6/5/23. Delaware Nation does not object to the project or the Section 106 effect determination and recommends the project proceed as planned. Delaware Nation wishes to consult further if artifacts are uncovered during the course of the project.

For Delaware Tribe of Oklahoma and Shawnee Tribe, no comment or objection was received within 30 days of the 5/15/23 notification.



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Environmental Commitments

Are there any Environmental Commitments? Yes



Ecological

ESR

ESR Name:	ESR Type:	Coordination Complete Date:
Cuy-Eagle Bridge ESR	Level 1	10/16/2023

Wetlands

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

Remarks:

No wetlands were present on either side of the project area. These areas have been highly developed and have retaining walls along the Cuyahoga River banks further preventing the formation of wetlands in this area.

Streams & Rivers

ESR Name:	Stream Name:	National or Scenic Rivers or NRI Streams:	Ohio EPA Aquatic Life Use Designation:	Antidegradation Designation:	Total Impact Length(ft.):
Cuy-Eagle Bridge ESR	Cuyahoga River	No	WWH	General High Quality Water	0

Total impact length (ft.) to perennial streams: 0

Total impact length (ft.) to intermittent streams: 0

Total impact length (ft.) to ephemeral streams: 0

Remarks:

The nature of this project will occur above the Cuyahoga River and using a barge to haul away materials. No impacts are expected to occur to the Cuyahoga River itself and no work will be done below the OHWM.



Other Surface Waters / Ditches

ESR Name:	Ditch Id:	Total Impact Area(ac.):
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Total impact to all ditches (ac): 0

Other Surface Waters / Other Water Bodies

ESR Name:	Water Body Id:	Hydrologic Connection:	Type:	Designated Function:	Total Impact
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Remarks:

There were no ditches found in the vicinity of the project area.

Terrestrial Habitats

ESR Name:	Vegetative Communities and Land Cover found within the project study area:	Degree of man induced ecological disturbance:	Unique, rare, or high quality:	Within Project Study Area(s) (ac.):	Alternative Impacts (ac.):
Cuy-Eagle Bridge ESR	Developed, High Intensity (DH) - Includes Highly Developed Areas Where People Reside or Work in High Numbers. Examples Include Apartment Complexes, Row Houses and Commercial/Industrial. Impervious Surfaces Account for 80 to 100% of the Total Cover.	Extreme Disturbance/Ruderal Community (Dominated by Opportunistic Invaders or Native Highly Tolerant Taxa)	No	0.77	0.77

Remarks:

The project area is highly developed industrial on the right and left banks. The terrestrial habitat is considered to be in "Extreme Disturbance" with impervious surfaces equating to 80 to 100% of the total cover. The vegetation consists of primarily a large variety of opportunistic invasive species and some highly tolerant native species.

Threatened or Endangered Species / Federally Listed Species

Species Common Name:	Species Scientific Name:	Listing Status:
Indiana Bat	Myotis sodalis	Endangered



ESR Name: Cuy-Eagle Bridge ESR

Effect Determination: No Effect

Discussion Including impacts to Suitable Habitat:

No suitable wooded habitat (SWH) exists within the investigation area. Trees which were found onsite were isolated and provided few if any roosting potential or habitat features and did not meet the definition of SWH as outlined in the Biological Opinion for the Ohio Department of Transportation's (ODOT) Federal Aid Highway Program That May Affect the Federally Endangered Indiana Bat and/or Federally Threatened Northern Long-Eared Bat . The Eagle Avenue Bridge contains multiple instances of cracks and crevices which would provide suitable roosting habitat (see attached photo log). The bridge is situated over the Cuyahoga River within the navigable portion of the channel which may allow for foraging opportunities. However, no evidence of staining or other secondary evidence was observed during site visit. It was also noted that due to urbanization, the site receives significant light and noise pollution throughout the year. The bridge was observed from the ground due to safety concerns. Additionally, the work of removing the main span will take place during January 1st through March 31st when bats would not be utilizing the bridge as roosting habitat. Because no SWH will be impacted by the project and an inspection of the bridge did not observe evidence of roosting bats, this project will have no effect on the Indiana or northern long-eared bats.

Species Common Name:	Species Scientific Name:	Listing Status:
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered

ESR Name: Cuy-Eagle Bridge ESR

Effect Determination: No Effect

Discussion Including impacts to Suitable Habitat:

No suitable wooded habitat (SWH) exists within the investigation area. Trees which were found onsite were isolated and provided few if any roosting potential or habitat features and did not meet the definition of SWH as outlined in the Biological Opinion for the Ohio Department of Transportation's (ODOT) Federal Aid Highway Program That May Affect the Federally Endangered Indiana Bat and/or Federally Threatened Northern Long-Eared Bat . The Eagle Avenue Bridge contains multiple instances of cracks and crevices which would provide suitable roosting habitat (see attached photo log). The bridge is situated over the Cuyahoga River within the navigable portion of the channel which may allow for foraging opportunities. However, no evidence of staining or other secondary evidence was observed during site visit. It was also noted that due to urbanization, the site receives significant light and noise pollution throughout the year. The bridge was observed from the ground due to safety concerns. Additionally, the work of removing the main span will take place during January 1st through March 31st when bats would not be utilizing the bridge as roosting habitat. Because no SWH will be impacted by the project and an inspection of the bridge did not observe evidence of roosting bats, this project will have no effect on the Indiana or northern long-eared bats.

Species Common Name:	Species Scientific Name:	Listing Status:
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Species of Concern

ESR Name: Cuy-Eagle Bridge ESR

Effect Determination: No Effect

Discussion Including impacts to Suitable Habitat:



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No evidence of current Bald Eagle nesting was observed on the Eagle Avenue Bridge. No suitable trees adjacent to the Cuyahoga River within the investigation area were present. However, it may be possible the Eagle Avenue Bridge would provide suitable nesting potential for the Bald Eagle.

Species Common Name:	Species Scientific Name:	Listing Status:
Piping Plover	Charadrius melodus	Endangered

ESR Name: Cuy-Eagle Bridge ESR

Effect Determination: No Effect

Discussion Including impacts to Suitable Habitat:

No suitable habitat for the Piping Plover was observed within the project site. Portions of the site not considered roadway were comprised of mowed and maintained lawn as well as loose fill material. No beach habitat is near within or near the project area.

Species Common Name:	Species Scientific Name:	Listing Status:
Rufa Red Knot	Calidris canutus rufa	Threatened

ESR Name: Cuy-Eagle Bridge ESR

Effect Determination: No Effect

Discussion Including impacts to Suitable Habitat:

No suitable habitat for the Rufa Red Knot is present within the Eagle Avenue Bridge Project Site. The site is comprised of paved surfaces, mowed and maintained lawn, and loose fill material. No large scale sandy/cobble beach or mudflats are present.

Species Common Name:	Species Scientific Name:	Listing Status:
Tricolored Bat	Perimyotis subflavus	Proposed Endangered

ESR Name: Cuy-Eagle Bridge ESR

Effect Determination: No Effect

Discussion Including impacts to Suitable Habitat:

No suitable woody stands of live or dead trees are present within the Eagle Avenue Bridge Project Site. However, the Eagle Avenue Bridge likely contains habitat roosting potential. A site inspection was performed from the ground due to safety concerns. No bats were observed and no secondary evidence of bat roosting, such as staining, was noted.

Threatened or Endangered Species / State Listed Species:

No state listed species or suitable habitats are impacted by this project location.

ESR Name: Cuy-Eagle Bridge ESR



Species Common Name: Schweinitz' Umbrella Sedge

Species Scientific Name: *Cyperus schweinitzii*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: Canada Hawkweed

Species Scientific Name: *Hieracium umbellatum*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: little brown bat

Species Scientific Name: *Myotis lucifugus*

Listing Status: Endangered

The species or its suitable habitat will be impacted by this project: Yes

Effect Determination: Yes

Discussion Including impacts to Suitable Habitat:

No suitable woody stands of live or dead trees are present within the Eagle Avenue Bridge Project Site. However, the Eagle Avenue Bridge likely contains habitat roosting potential. A site inspection was performed from the ground due to safety concerns. No bats were observed and no secondary evidence of bat roosting, such as staining, was noted. Additionally, the work of removing the main span will take place during January 1st through March 31st when bats would not be utilizing the bridge as roosting habitat. Because no suitable woody habitat will be impacted by the project and an inspection of the bridge did not observe evidence of roosting bats, this project will have no impact on the little brown bat.

Species Common Name: spotted turtle

Species Scientific Name: *Clemmys guttata*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: Blanding's turtle

Species Scientific Name: *Emydoidea blandingii*

Listing Status: Not Provided - No impact to this species



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The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: smooth greensnake

Species Scientific Name: *Opheodrys vernalis*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: upland sandpiper

Species Scientific Name: *Bartramia longicauda*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: American bittern

Species Scientific Name: *Botaurus lentiginosus*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: trumpeter swan

Species Scientific Name: *Cygnus buccinator*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: sandhill crane

Species Scientific Name: *Grus canadensis*

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact



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Species Common Name: least bittern

Species Scientific Name: Ixobrychus exilis

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Species Common Name: black-crowned night-heron

Species Scientific Name: Nycticorax nycticorax

Listing Status: Not Provided - No impact to this species

The species or its suitable habitat will be impacted by this project: No

Effect Determination: No Impact

Remarks:

Upland Sandpiper (*Bartramia longicauda*), American Bittern (*Botaurus lentiginosus*) Regal Fritillary (*Speyeria idalia*), Chimarra socia, Lake Sturgeon (*Acipenser fulvescens*), Black Bear (*Ursus americanus*), Smooth Greensnake (*Opheodrys vernalis*), Trumpeter Swan (*Cygnus buccinator*), Sandhill Crane (*Grus canadensis*), Least Bittern (*Ixobrychus exilis*), Black-crowned Night-Heron (*Nycticorax nycticorax*), Spotted Turtle (*Clemmys guttata*), Blanding's Turtle (*Emydoidea blandingii*), Sharp-shinned Hawk (*Accipiter striatus*), Grasshopper Sparrow (*Ammodramus savannarum*), Great Egret (*Ardea alba*), Common Nighthawk (*Chordeiles minor*), Marsh Wren (*Cistothorus palustris*), Black-billed Cuckoo (*Coccyzus erythrophthalmus*), Bobolink (*Dolichonyx oryzivorus*), American Coot (*Fulica americana*), Common Gallinule (*Gallinula galeata*), Red-headed Woodpecker (*Melanerpes erythrocephalus*), Sora Rail (*Porzana Carolina*), Prothonotary Warbler (*Protonotaria citrea*), Virginia Rail (*Rallus limicola*), Cerulean Warbler (*Setophaga cerulea*), Tiger Spiketail (*Cordulegaster erronea*), Longnose Dace (*Rhinichthys cataractae*), Star-nosed Mole (*Condylura cristata*), Deer Mouse (*Peromyscus maniculatus*), Smoky Shrew (*Sorex fumeus*), Badger (*Taxidea taxus*), Common Gray Fox (*Urocyon cinereoargenteus*), Elktoe (*Alasmidonta marginata*), Creek Heelsplitter (*Lasmigona compressa*), Queensnake (*Regina septemvittata*). Lake Sturgeon (*Acipenser fulvescens*): Suitable Habitat Description- Lake Sturgeon are benthic fish which spawn in riverine habitat with rocky substrates like gravel, cobble, and interstitial spaces. Discussion Including Impacts to Habitat: The Cuyahoga could possibly provide intermediate habitat to breeding populations traveling between Lake Erie and breeding grounds. No impact on the river or the ability for fish to pass is expected from the project.

Agency Coordination

Project Coordination:



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Project locations for which no agencies are listed are considered ecologically exempt or non-notifying.

The ODNR and USFWS conditions outlined in the Ecological MOA apply to all projects that are not considered ecologically exempt. These conditions have been evaluated for the project locations listed below.

ESR Name:	Agency:	Submitted for Coordination Date:	Coordination Complete Date:	Were project specific comments received?
Cuy-Eagle Bridge ESR	No agency coordination required			

Additional Coordination Considerations:

Are other ecological coordination requirements applicable? No

Remarks:

This project area is ecologically exempt due to no ecological disturbances or alterations will be occurring.

Are there any environmental commitments? No



Other Resources

Farmlands

The proposed project is located within an Urbanized Area Yes

The proposed project is located in an area that is in or committed to urban development or water storage and is therefore not subject to the Farmland Policy Protection Act (FPPA) in accordance with 7 CFR 658. No further coordination is required.

FCIR Required Completion of the Farmland Conversion Impact Form is required and coordination with USDA & NRCS is required.

Remarks:

Based upon review of appropriate mapping, the proposed project is located in an urbanized area zoned for non-agricultural purposes and is not an agricultural district. Therefore, the proposed project meets the terms and conditions of the Memorandum of Understanding between the Natural Resources Conservation Service and the Ohio Department of Transportation for Projects Involving Farmlands (Agreement No. 19552), executed on March 15, 2016. No further coordination is required. Urbanized Area Map can be found in the Project File under Other Resources/Farmlands.

Are there any environmental commitments? No

Drinking Water

The proposed project is wholly or partially located within the USEPA designated boundaries of a Sole Source Aquifer No

	Present:	Impacted:
The proposed project is wholly or partially located within the OEPA designated boundaries of a Source Water Protection Area	No	

Coordination with the Local Public Water Administrator is required No

	Present:	Impacted:
Residential Wells are present	No	

Remarks:

The Ohio EPA Division of Drinking and Ground Waters mapping tool used to identify the presence of drinking water resources and Sole Source Aquifer within the project area. The map indicates that there are no public water system wells, intakes resources within 1/2 mile of the project area. The project area is not in a Federally-designated Sole Source Aquifer.

Are there any environmental commitments? No



Section 4(f)

Section 4(f) Determination

Section 4(f) properties are within and/or adjacent to the proposed project area Yes

Concurrence received from the OWJ Yes

Were there multiple OWJs? Yes

Name	Date concurrence received
Cleveland Metroparks	01/02/2024
Ohio Department of Natural Resources	12/12/2023
Ohio SHPO	06/08/2023

	Present:	Impacted:
Publicly owned Park(s):	No	
Publicly owned recreation facility(ies) and/or area(s):	Yes	Yes
Wildlife and Waterfowl refuge(s):	No	
Historic Site(s):	Yes	Yes

Identified Section 4(f) Properties

Identified 4(f) Properties

Property Name	Type	Permanent ROW/Easement Acres	Temporary ROW/Easement Acres	4(f) finding	Date
Eagle Avenue Bridge	Historic Site	0	0	Individual Evaluation	01/04/2024
Cuyahoga River Water Trail	Publicly owned Recreational Facility and/or Area	0	0	Temporary No Use Exception - 774.13(d)	01/09/2024
Ohio & Erie Towpath Trail (AKA Towpath Trail at Tremont)	Publicly owned Recreational Facility and/or Area	0	0	De Minimis	01/04/2024
Fire Station #21	Historic Site	0	0	Present; Not Impacted	06/08/2023

Remarks:



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Eagle Avenue Bridge

The removal of the historic bridge constitutes a use under Section 4(f). A Draft Individual Section 4(f) Evaluation was prepared and coordinated the Department of the Interior, who concurred with the 4(f) finding on 12/5/23. The documentation received legal sufficiency approval 12/22/23 and the Final Individual Section 4(f) Evaluation was completed on 1/4/24. The Individual Evaluation contains an alternatives analysis including least overall harm analysis and minimization and mitigation of harm. The Section 106 MOA includes measures to mitigate adverse effects to the historic property.

Cuyahoga River Water Trail

The Cuyahoga River Water Trail is a marked route for recreation under the jurisdiction of the Ohio Department of Natural Resources (ODNR). The trail flows through Geauga, Portage, Summit, and Cuyahoga Counties before reaching Lake Erie in Cleveland. During demolition activities, river traffic (including recreational access) to the Cuyahoga River will be closed. Notifications will occur as described in the Measures to Minimize Harm below. Minimal impacts to recreational boating are anticipated since this work will occur during the winter months. A Section 4(f)/6(f) Determination Request Form for Recreational Properties (DRF) was submitted to ODOT-OES on January 2, 2024. Based upon review of the DRF it was determined the proposed project can proceed as an exception to the requirement for Section 4(f) approval. In accordance with 23 CFR 774.13(d), the temporary occupancy of land and/or access will not constitute a use upon the protected recreational activities, features, or attributes associated with the Cuyahoga River Water Trail. 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. Therefore, there is 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 to the Cuyahoga River Water Trail.

Ohio & Erie Towpath Trail

The Ohio & Erie Towpath Trail ("Trail") extends across 101 miles following the historic route of the Ohio & Erie Canalway. The Trail is a collaboration of several agencies/organizations that have jurisdiction over various portions, including the Cleveland Metroparks, the City of Cleveland, Canalway Partners, and Cuyahoga County. The portion within the project limits (AKA Towpath Trail at Tremont) is under the jurisdiction of Cleveland Metroparks and consists of a multi-purpose paved trail along the Cuyahoga River and adjacent to Scranton Road. At the approach to the Eagle Avenue Bridge, the Trail crosses Scranton Road to continue on the north side of Carter Road. There is an ad hoc parking area for the trail at the Fire Station north of the Bridge. During construction, users of the Ohio & Erie Towpath Trail will detour along Scranton Road to rejoin the existing trail on Carter Road. Specifics of the detour will be determined during design. Access to the ad hoc parking area at the Fire Station will be closed during construction. On-street parking access will be maintained on one side of the street at a minimum. A Section 4(f)/6(f) Determination Request Form for Recreational Properties (DRF) was submitted to ODOT-OES on January 2, 2024. Based upon review of the DRF it was determined a de minimis impact will occur to the Ohio & Erie Towpath Trail in accordance with 23 CFR 774. The determination was made based on the proposed scope of work and concurrence received from Official with Jurisdiction (OWJ) regarding the assessment of impacts that are included in the DRF. Therefore, there is 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 to Ohio & Erie Towpath Trail.

Are there any environmental commitments? Yes



Section 6(f)

Section 6(f) Determination

Section 6(f) Determination

	Present:	Impacted:
6(f) Properties:	No	

Remarks:

Research of the Land and Water Conversation Fund (LWCF) website <https://lwcf.tplgis.org/mappast/> by Lawhon & Associates, Inc. did not identify any public parks or recreation areas that have used Section 6(f) funds within or adjacent to the project area. No funds were used to require and/or develop said recreation areas. Therefore, no further coordination is required. LWCF grant list is available in the Project File under Section 6(f).

Are there any environmental commitments? No



Community Impacts

Community Impacts

Will the proposed action comply with the local/regional development patterns for the area? Yes

Remarks:

The proposed project is consistent with local and regional development pattern. The project is listed in the Northeast Ohio Area-wide Coordinating Agency's (NOACA's) the MOP for the region FY 2021-2024 Transportation Improvement Program (TIP).

Will the proposed action result in substantial negative impacts to community cohesion? No

Remarks:

The proposed project will not result in substantial negative impacts to community cohesion. The removal of the bridge will address the structural deficiencies of the bridge and the safety issues related to those deficiencies.

Will the proposed action result in indirect or cumulative impacts? No

Remarks:

The bridge removal will not result in foreseeable indirect or cumulative impact. The proposed project is expected to address the structural deficiency of the bridge and the associated safety concerns that including a potential lift span collapse, which endanger lives and impede the movement of commercial and traffic along Cuyahoga River.

Will the proposed action result in substantial impacts on health and educational facilities, public utilities, fire, police, emergency services, religious institutions, public transportation, pedestrian and bicycle facilities? No

Remarks:

No substantial impact on health and education facilities, fire, police, emergency services, religion institutions, or public transportation facilities is anticipated. Since the bridge is currently closed, the construction will not impact any of these services. The removal of the bridge will not have construction/demolition work occur in the shipping channel.

Will the proposed action displace residents, businesses, institutions or farms? No

Remarks:

No displacement for the proposed project is anticipated.

Will the proposed project result in impacts to Underrepresented Populations (Limited English Proficiency, Older Adults, or Adults with Disabilities) raised during Public Involvement? No

Remarks:

The proposed project will not result in impacts to underserved populations (Limited English Proficiency, Older Adults, or Adults with Disabilities).

Are there any Environmental Commitments? No



Environmental Justice

Environmental Justice

Identified Environmental Justice Populations

Census Block Group #	% Minority	% Low Income
390351042001	74	54
390351077011	35	33
390359801001	0	0

Are Environmental Justice Populations located within and/or adjacent to the proposed project area? Yes

Are there any relocations? No

Will there be changes to access? No

Will the proposed project result in unanticipated additional impacts to any Environmental Justice Populations? No

Were any concerns related to impacts on Environmental Justice Populations or any other unique factors that could result in a disproportionately high and adverse effect raised during public involvement? No

Remarks:

Based on mapping from TIMS, the minority populations are 0-74% for the US Census Block Groups located within the project area and 0-54% of the population is designated as low income.

The proposed project will have no disproportionately high and adverse effects to minority or low-income populations based upon the table above, the attached mapping, and the answers to the questions above. No concerns related to impacts on Environmental Justice 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, FHWA Order 6640.23A, no further analysis is required.

Based on the above findings an Environmental Justice Analysis Report is not required. No concerns raised as a result of public involvement.

The Census mapping may be found in the project file under Environmental Justice.

Are there any Environmental Commitments? No



Public Involvement

Public Involvement

Please provide a summary of the Public Involvement activities that have been conducted for this project. (For example press releases, letters to affected property owners and residents, meetings, special purpose meetings, newspaper articles, etc)

Public Engagement Plan for the project was accepted by ODOT District 12 and ODOT OES staff at a project meeting in April 2023.

Letters were mailed on June 12, 2023, to property owners around the project area, stakeholders (Vision for the Valley contacts), and a list of the suggested Consulting Parties. The letters invited the public to a virtual open house via "PublicInput" page utilizing a recorded power point presentation and provided information on the project including a project description, historic significance, alternatives considered and recommendation, and how to comment on the project. The letters included a link the "PublicInput" page (<https://publicinput.com/g8483>) where materials can be accessed, project information, recorded presentation, and comments could be submitted. A Consulting Party application included in the letters for individuals who would like to give input regarding a historic preservation value into removing of the bridge. Comments period ended July 14, 2023.

A press release posted on the City of Cleveland website on June 12, 2023, notified the public of the "PublicInput" page soliciting their comments on the project by July 14, 2023.

The Consulting Parties meeting was held as part of the Section 106 Consultation Process on August 16, 2023. This meeting was held to inform the consulting parties about the purpose of the project, the alternatives under consideration, the comparison of alternatives, effects on the historic bridge, and to discuss proposed mitigation measures.

Is there any substantial environmental controversy on environmental grounds?

No

Please summarize the Public Involvement responses received.

The purpose of this open house was to provide information about the project context, the proposed project, historical background, and to share details about the four proposed alternatives to address the project purpose and need. The meeting was intended to receive feedback from the public about the alternatives, to gather the public comments, and to solicit potential consulting parties. The virtual open house was viewed by approximately 1,842 individuals. Comments were received from 65.

The majority of the received comments were in favor of the preferred alternative (removal of the bridge). Several did not agree with the proposed demolition and/or desired repair of the bridge as a feature of development occurring in the area. Two comments included a request to be a consulting party. Details of the public comments are available in the Project File/Public Involvement.

Responses to comments were uploaded to the PublicInput.Com website ([CUY Eagle Avenue Bridge - PublicInput](#)).

Are there any Environmental Commitments? No



Permits

Waterway Permits

Are Waterway Permits required? No

ODNR

Shore Structure Permit : No

Remarks:

Coordination with the United States Army Corps of Engineers (USACE) was performed related to a Section 10 and Section 404 Permits. Information related to the proposed work and its methodology was submitted for review on March 31, 2023 and a site visit conducted on April 21, 2023 to fully describe the action. As a result, a Section 10 permit is not required. Further, since no permanent or temporary fill will be placed below the Ordinary High Water Mark of the Cuyahoga River, Section 404 authorization is also not required. Documentation related to the permit determinations was provided on July 17, 2023.

The proposed work falls under the purview of the United States Coast Guard (USCG) and plans were submitted for review during project development. A Section 9 permit is not required/applicable for the proposed work and methodology as the structure is being removed/demolished. The Section 9 permit that was issued when the CUY-Eagle Avenue bridge was constructed also permitted its removal at such time when it ceased to operate. Section 9 Coordination was performed with USCG related to navigation along the Cuyahoga River including submittal of mapping showing four (4) potential locations for barge anchoring along the channel that illustrated locations here the Contractor can park a barge and disassemble the structure. No comments were received.

Are there any environmental commitments? Yes

Storm Water Permits

NPDES Construction General Permit for Stormwater (NOI): No

Watershed Specific NPDES Construction General Permit for Stormwater (NOI): No

Remarks:

Construction of the project is anticipated to result in less than one acre of earth-disturbing construction activities. Therefore, Notice of Intent (NOI) is not required for this project.

Are there any environmental commitments? No

Floodplains

The proposed project involves encroachment within a Special Flood Hazard Area (SFHA) No

Remarks:

Based on review of the FEMA Flood Insurance Rate Map (FIRM) Community Panel 39035C0177F by Lawhon & Associates, Inc. on April 6, 2023, the project located within a regulated floodplain. However, no impact is anticipated. Floodplains is within the bulkheads at the project location and there is no work to be done there.

Are there any environmental commitments? No



Environmental Commitments

Cultural Resources

- 1) Eagle Ave. Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, in the vicinity of the western entrance to the bridge, ODOT and the City of Cleveland will install an interpretive display commemorating the significance of the Eagle Avenue Bridge. Components of the permanent record completed for the bridge such as text, drone video, still photography, historic photographs, and shop drawings may be incorporated into the display. The display may include a QR Code linked to a drone flyover video and historic photographs. The City will post the video and historic photographs to YouTube or facilitate such posting on the Michael Schwartz Library, Cleveland State University's Cleveland Memory Project Website (www.clevelandmemory.org).
- 2) Eagle Ave. Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, ODOT and the City of Cleveland will include the western entrance gate in the Eagle Avenue Bridge display. The contractor will remove the gate prior to bridge demolition, store it during construction, and rehabilitate and reinstall it as a component of the display. The plans will include a plan note that outlines the removal of the gate for re-erection (removal of bolts, no cutting, etc.), plan for storage, any rehabilitation work needed, and plan for re-erection of the gate in the vicinity of the western entrance to the Eagle Avenue Bridge as part of the Eagle Avenue Bridge interpretive display (reinstallation of bolts, etc.).
- 3) Eagle Ave. Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, ODOT will ensure the SHPO, Consulting Parties, and the Cleveland Metroparks are provided 30 days to review and comment on the Eagle Avenue Bridge display design (including plan note regarding removal and reinstallation of the gate) and text prior to final design.
- 4) Eagle Ave. Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, the City of Cleveland will be responsible for future maintenance of the Eagle Avenue Bridge display.
- 5) Vertical Lift Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, in the vicinity of the Columbus Road Lift Bridge, ODOT and the City of Cleveland will install an interpretive display focusing on the historic context of Cleveland's vehicular vertical lift bridges. Components of the display may include text, historic photographs, a QR Code linked to a drone flyover video or other media. The display will complement the Eagle Avenue Lift Bridge interpretive display.
- 6) Vertical Lift Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, ODOT will ensure the SHPO, Consulting Parties, and the Cleveland Metroparks are provided 30 days to review and comment on the Vertical Lift Bridge display design and text prior to final design.
- 7) Vertical Lift Bridge Display: In accordance with the Section 106 MOA, executed January 4, 2024, the Cleveland Metroparks will be responsible for future maintenance of the Vertical Lift Bridge display installed near the Columbus Road Lift Bridge.
- 8) Recordation: In accordance with the Section 106 MOA, executed January 4, 2024, ODOT will ensure that the City of Cleveland engages a person(s) meeting the Secretary of Interior's Professional Qualification Standards in History and/or Architectural History (NPS 1983:44738-9) to create a record of the bridge similar in content to the Historic American Engineering Record (HAER) Level 2 National Park Service (NPS) Standards. The permanent record will include drone video and still photographs of the Eagle Avenue Bridge. The original shop drawings will be scanned, and digital versions will be saved as part of the permanent record. High resolution digital photography will be provided in lieu of large format photographs.



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9) Recordation: In accordance with the Section 106 MOA, executed January 4, 2024, the City of Cleveland will submit a digital copy of the draft permanent record documentation including scanned digital versions of the shop drawings and original photographs to ODOT for distribution to the SHPO and Consulting Parties for a 30-day review and comment period.

10) Recordation: In accordance with the Section 106 MOA, executed January 4, 2024, upon making suggested revisions based on comments provided by the SHPO and Consulting Parties, the City of Cleveland will provide an electronic version of the final submittal of the permanent record to ODOT for distribution to the SHPO; Consulting Parties; the Kelvin Smith Library, Case Western University; and the Michael Schwartz Library, Cleveland State University.

11) Recordation: In accordance with the Section 106 MOA, executed January 4, 2024, the City of Cleveland will submit three bound copies and one electronic version of the final permanent record package to ODOT for distribution to the State Library of Ohio at the following address:

Ms. Elissa Lawrence

Government Information Services

The State Library of Ohio

274 First Avenue

Columbus, OH 43201

"Submitted to the Ohio Historic Preservation Office" must appear on the title page of the documentation.

Section 4(f)

1) WATER TRAIL: The Project Designer shall include the following notes in the plans:

Recreational boating access within the project area shall be maintained at all times during construction activities, except for the time needed for temporary access restrictions associated with demolition and construction activities.

Temporary access restrictions will be less than the time needed for overall project construction and will only occur when construction activities are deemed unsafe for paddlers/boaters.

The Project Engineer or Contractor shall notify ODNR Parks and Watercraft (Natalie.Foos@dnr.ohio.gov) 48 hours in advance when restrictions lasting longer than a day will occur. The use of flaggers or other means will be used to alert paddlers/boaters when short-term restrictions (e.g. 15-30 minutes intervals) are needed.

The Contractor shall place appropriate signage/markers 300 feet upstream and 300 feet downstream of the project area to alert paddlers/boaters of construction activity and for wayfinding purposes.

The Project Engineer or Contractor shall notify ODNR Parks and Watercraft (Natalie.Foos@dnr.ohio.gov) 14 calendar days prior to the start of construction activities to allow ODNR to post notice of the impending construction on the appropriate ODNR webpages and associated online boating maps. As part of notification efforts, the Project Engineer shall also provide plans that indicate signage location along the waterway and any additional planned notification efforts with ODNR that will take place during or after construction.

The Contractor shall closely coordinate the construction schedule (including access restrictions) with ODOT and ODNR prior to the start of construction activities.

If on-the-water law enforcement is needed during any portion of the construction activities, the Project Engineer or Contractor shall contact the ODNR Division of Parks and Watercraft Law Enforcement Supervisor (419-341-9044, Lt. Chad Kozan).

2) RECREATIONAL TRAIL: The Project Designer shall include the following notes within the plans:

Access to the Ohio & Erie Towpath Trail outside of the construction limits will be maintained. Trail traffic will be detoured when necessary during construction activities utilizing the detour as specified in the plans.

Temporary construction fencing and signage will be installed to protect the Section 4(f) property and the public.

The contractor shall be required to closely coordinate the construction schedule with ODOT, the City of Cleveland, and Cleveland Metroparks prior to the start of construction activities.



Environmental Document Level: D2

PID 118527 CUY Eagle Avenue Bridge

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3) **PUBLIC EVENTS:** The designer will include a plan note to prohibit the contractor from blocking Scranton Avenue during these public events, Towpath Marathon (October 5-6, 2024) and Towpath Trail Lantern Parade (March 1-2, 2025)

Permits - Waterway Permits

1) The construction engineer must coordinate the contractor's demolition plan with the ODOT Office of Environmental Services (OES). OES will coordinate the demolition plan with the U.S. Coast Guard. The contractor must address all the comments from the U.S. Coast Guard and will need formal approval from the U.S. Coast Guard prior to demolition of the bridge.

2) The U.S. Coast Guard must be invited to the Pre-Construction Meeting. The contact information:

Mr. Lee D. Soule
Bridge Management Specialist
C/O Commander (DPB)
9th Coast Guard District
1240 East Ninth Street
Cleveland, OH 44199-2001
Direct: (216) 902-6085
VOIP: (571) 607-4154
Email: Lee.D.Soule@USCG.MIL

3) U.S. Coast Guard has restricted the work on the Cuyahoga River between December 31 to March 31st when there is a low volume of river traffic.



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Approvals & Electronic Signatures

Approved & Electronically Signed By:	Approval Date:
Erica Schneider (ASST ENVIR ADM)	1/19/2024



Appendix

ESA

Environmental Database Search Results Soil Mapping.pdf

General

Aerial Map.pdf

County Map.pdf

USGS Quadrangle Topographical Map.pdf

Purpose and Need

OES Acceptance - Purpose and Need.pdf

Cultural Resources

ACHP Response.pdf

SHPO Comments

Transmittal 1 - Effect Determination

Tribal Consultation

Tribal Consultation - Correspondence List and Example Email.pdf

Tribal Response - Delaware Nation.pdf

Ecological

ODNR Scenic River MOA Conditions

USFWS/ODNR Ecological MOA Conditions

Other Resources

Census Bureau Urbanized Area Map.pdf

Water Source Protection Area Map.pdf

Well Log Data.pdf

Section 4(f)

Legal Sufficiency Review Final.pdf

Legal Sufficiency Review Request Email.pdf

Legal Sufficiency Review Request-Final Individual Eval.pdf

OES Cultural Resources 4(f) Determination DOI Concurrence.pdf

OES Cultural Resources 4(f) Determination DOI Email Draft IE.pdf

OES Recreational 4(f) Determination-Cuy River Water Trail.pdf



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OES Recreational 4(f) Determination-O&E Towpath Trail.pdf

Environmental Justice

Census Mapping.pdf

Public Involvement

News Article 2.pdf

News Article 3.pdf

News Article.pdf

Press Release.pdf

Property Owner Notification Letter.pdf

Public Comments Received.pdf

Public Involvement Plan.pdf

Public Meeting Presentation 2.pdf

Public Meeting Presentation.pdf

Public Notification Mailing List.pdf

Response to Public Comments.pdf

Permits

FEMA FIRM.pdf