



OHIO DEPARTMENT OF TRANSPORTATION

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

Environmental Document for TRU GR FY2025 PID 114768 Environmental Document Level: C2

Approved: 9/27/2023

Prepared By: 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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Project Information

PID: 114768

Project Sponsor: TRUMBULL COUNTY ENGINEER

ODOT District: 4

Funding Source: Federal

Project Description:

The Trumbull County Engineer proposes to upgrade/replace existing guardrail, including replacement of Type A anchor end terminal assemblies and Type 4 guardrail, and install new guardrail, including the installation of new anchor end terminal assemblies and barrier reflectors. Work will be performed at 20 locations along 17 county and township roads in Trumbull County.

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

A minimum of one 10-foot lane of traffic in each direction shall be maintained during project construction. Road closures and detours are not proposed to construct the project. Lane restrictions/reductions shall not be permitted after normal working hours. Construction and lane restriction/reduction information will be posted within the project construction limits prior to the start of project construction. Access shall be maintained to all adjacent properties, businesses and intersecting side streets during project construction. Substantial traffic disruptions are not expected during project construction.

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

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

The proposed guardrail work at Site #12 identified in the Stage 2 design plans will eliminate a total of 0.022-acre of jurisdictional wetlands. See the wetlands impact information for the project in the Level 1 ESR in the project File/Ecological/Reports subsection. It was determined that the remaining nineteen (19) sites identified in the Stage 2 design plans will not impact Waters of the U.S., Unionid Mussels, migratory nesting birds, suitable habitat for Federal and State species, roosting bats, etc., therefore, these sites are considered ecologically exempt under the Ecological MOA (Agreement No. 19394). See the *Ecologically Exempt TRU-GR-FY2025 Exempt Locations Amended.pdf* for the project in the Project File/Ecological/Reports subsection. A copy of the Stage 2 Design plans for the project is included in the Project File/General/Project Information subsection as *Stage 2 Design.pdf*. The project will not impact any other environmentally sensitive resources within the project study areas.

The environmental document and associated studies, as applicable, were approved using the Stage 2 Design plans for the project. A copy of the Stage 2 Design plans for the project is included in the Project File/General/Project Information subsection as *Stage 2 Design.pdf*.

The estimated total project cost specified in Ellis agrees with the total project cost specified in the ODOT State Fiscal Years 2024 - 2027 Statewide Transportation Improvement Program (STIP).

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

Ellis STIP Details

Phase	Current STIP Reference
ENV	
CO	114768: 24-27 STIP
DD	



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

Select the appropriate project type:

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

In accordance with 23 CFR 771.117(e), the proposed project cannot be processed as a C2 CE, if it involves -

1. **a.** Acquisition of more than a minor amount of ROW (exceeds strip takes)
2. **b.** Residential or non-residential displacements
3. **c.** A U.S. Coast Guard permit or an Individual Section 404 permit under the Clean Water Act
4. **d.** A Section 106 finding of *Adverse Effect*
5. **e.** Section 4(f) impacts greater than de minimis
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.** A full Environmental Justice Analysis Report (EJAR) is required (the project must be processed as a D-level CE or higher-level document). If a memo-to-file/letter/IOC-format EJAR Short Report is determined to be the appropriate level of documentation, contact OES regarding NEPA document level.

For certification purposes, documentation is required to illustrate no significant impacts will occur to the following environmental resources and that no unusual circumstances exist that would warrant a higher level of NEPA document. Upload all supporting documentation to the project file.

Ecological

Waterways:

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



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Waterways Permit Type:	Permit Determination and/or Permit Application Approval Pending
Isolated Wetland Permit	No
Will any wetlands be impacted?	Yes
Endangered Species:	No Impacts to Protected Species and Critical Habitat
Scenic Rivers	No National Wild and Scenic River Within 1000 Feet of the Proposed Project Area
Scenic Rivers Remarks	N/A.
Floodplains	
100-Year Floodplain:	Encroachment Within the SFHA is a Functionally Dependent Use
EO 11988 Compliance Met	Yes
NFIP Coordination and Documentation Completed	Yes
NFIP Local Floodplain Coordinator Notification Date:	09/26/2023
Floodplain Remarks	
<p>ODOT District 4 Environmental Section personnel reviewed the FEMA FIRM for the project study area and determined the project is located within a special flood hazard area. The Project Designer shall ensure the project is designed to comply with all applicable Local, State and Federal floodplain protection standards. If required, floodplain permitting shall be obtained prior to the start of construction. See the floodplains documentation for the project in the Project File/Permits/Floodplains subsection.</p>	
Section 4(f)	
Section 4(f):	Not present
Section 4(f) Remarks	N/A.
Section 6(f)	
Section 6(f):	Not present
Cultural Resources	
Cultural Resources:	Present; No Finding of Adverse Effect
Cultural Resources Coordination:	Minimum Potential to Cause Effect Appendix A
Cultural Resources Coordination - ODOT Approval/SHPO Concurrence Date	09/22/2023



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Cultural Resources Remarks

District environmental staff coordinated the project with ODOT-OES Cultural Resources Staff on September 21, 2023. Construction efforts will focus on existing operational rights-of-way, no buildings will be involved in construction and no relocations will be required by the project. Therefore, in accordance with Stipulation V(C)(1) and Appendix A of the Section 106 Programmatic Agreement executed on November 8, 2017 (Agreement No. 19319), amended on July 11, 2019, ODOT 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. No further coordination is required in accordance with the Section 106 Programmatic Agreement. See the cultural resources coordination documentation for the project in the Project File/Cultural Resources/Project Information subsection and the Cultural Resources Tab.

Environmental Resources Considered

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

Regulated Materials

Air Remarks

See the Air Quality documentation for the project in the Project File/Air/Project Information subsection.

Noise Remarks

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

The project involves ROW acquisition, Deep Excavation, or OEPA 513 Landfill Authorization: No

Hazardous Materials - OES Approval Date: 09/22/2023

Regulated Materials Review Remarks:

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.

Environmental Justice

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

Census Block Group #	% Minority	% Low Income
391559302001	24	38
391559301013	3	54
391559304003	0	21



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391559305003	0	32
391559306001	1	33
391559301023	5	14
391559313003	4	29
391559337001	2	11
391559337002	16	21
391559329001	12	27
391559207003	33	48
391559334001	7	26
391559335001	3	45
391559320001	26	47
391559335002	1	8
391559305002	1	49

Environmental Justice Remarks

A review of the ODOT Transportation Information Mapping System (TIMS) indicated Environmental Justice populations within the proposed project area. No businesses or residences will be acquired or relocated as part of the project. The proposed project will have no disproportionately high and adverse effects to minority or low-income populations based upon the table above and attached mapping. Therefore, in accordance with the protections of Executive Order 12898 and FHWA Order 6640.23A, no further analysis is required. See Environmental Justice documentation for the project in the Project File/Environmental Justice/Project Information subsection.

Public Involvement

Public Involvement:

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

Public Involvement Remarks

Based on the project scope of work, its Path 1 Project Development Process (PDP) Classification and the proposed maintenance of traffic measures, emergency/public services contact activities were not conducted for the project. The project has met the minimum public involvement requirements.

Environmental Commitments

Environmental Commitments

Yes



Ecological

Wetlands

ESR Name:	Wetland ID:	Hydrologic connection:	Wetland category:	Estimated total size (ac.):	Total estimated impact area by alternative (ac.):
TRU-GR-FY2025	Wetland A	Adjacent	Category 1	0.04	0.01
	Wetland B	Adjacent	Category 1	2.40	0.012
	Wetland C	Adjacent	Category 1	0.04	0
	Wetland D	Adjacent	Category 1	0.112	0

Has an Approved and/or Preliminary Jurisdictional Determination been made by the USACE? No

Total impact to all wetlands (ac.): 0.022

Total acres of non-isolated wetlands impacted: 0.022

Total acres of isolated wetlands impacted: 0

In accordance with Executive Order 11990 - USDOT Order 5660.1A, this Wetland Finding has been prepared to document that wetlands have been avoided to the extent possible to minimize the long and short term adverse impacts associated with the destruction or modification of wetlands, and to document that there are no practicable alternatives to avoid construction in wetlands.

An analysis of the 'Do Nothing' alternative indicates that it is not practicable because (check all that apply):

It Would Not Correct Safety Hazards.

An analysis of improvements that avoid all wetland impacts indicates that they are not practicable because (check all that apply):

They Will Result in Unique Engineering, Traffic, Maintenance, or Safety Problems.

They Will Not Meet the Identified Needs of the Project.

Include justification supporting the decisions noted above:

See wetlands impact information in the Level 1 ESR provided in the project File/Ecological/Reports subsection.

Total avoidance of wetlands during project construction is not practicable because of the location of the wetlands abutting the existing roadway embankment at South Leavitt Road SW over Little Duck Creek (Site 12), and because of the construction activities required at this location to eliminate existing safety hazards.



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The project footprint has been reduced to the maximum extent practicable. Implementation of additional measures to further reduce the impact footprint is not feasible or warranted based on: the purpose and need of the project; the location of the wetland resource relative to the project location; and the overall minor impacts of the project as currently designed.

The no-build alternative is not practicable because it does not satisfy the purpose and need of the project. Therefore, the no-build alternative was eliminated from consideration.

All practicable measures have been considered and incorporated into the project design to avoid, minimize, wetland impacts. The wetland impact minimization measures that will be followed for the project are documented in the environmental commitments for the project. Wetland mitigation for unavoidable impacts will be provided if required by the Clean Water Act or Ohio isolated wetland law, as regulated by the US Army Corps of Engineers and Ohio EPA regulations (33 CFR parts 325 and 332 and 40 CFR part 230, and OAC 3745-01-54), and (ORC 6111.027). No practicable alternatives exist for the proposed construction in wetlands, and the proposed action includes all practicable measures to minimize harm to the wetlands that may result from such use.

Remarks:

All practicable measures to minimize the wetland impacts inside the existing roadway rights-of-way have been considered and incorporated into the project design. Best management practices will be employed to minimize the impact to the remaining wetlands within the project study areas. See wetlands and other ecological resource impact information in ecological reports and agency coordination provided in the Project File/Ecological/Reports and Coordination subsections.



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1) 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.

2) No work shall be performed within the jurisdictional boundaries of any waterway, including wetlands, until the Trumbull County Engineer obtains the necessary waterway permit(s). Work includes placement of any temporary or permanent fills.



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Preparers and Approvals

Form Preparer

District 4
Contact: Brian Peck
330-786-4931
Brian.Peck@dot.ohio.gov

Approvals & Electronic Signatures

Approved & Electronically Signed By:	Approval Date:
Brian Peck (ENV SPEC 3)	9/27/2023



Appendix

General

USGS Quadrangle Topographical Map.pdf

Air

District Determination - No Air Analysis Required.pdf

Cultural Resources

OES Section 106 Effect Determination.pdf

Ecological

ODNR Scenic River MOA Conditions

USFWS/ODNR Ecological MOA Conditions

Environmental Justice

Census Mapping.pdf

Permits

District Determination - Floodplain Coordination Required.pdf

FEMA FIRM.pdf