



# OHIO DEPARTMENT OF TRANSPORTATION

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

## **Environmental Document**

for

## **CUY Old Highland Rd Bridge PID 119874**

**Environmental Document Level: C2**

**Approved: 5/19/2025**

**Prepared By: Cody Flynn**

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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

### Project Information

|                         |                      |
|-------------------------|----------------------|
| <b>PID:</b>             | 119874               |
| <b>Project Sponsor:</b> | Cleveland Metroparks |
| <b>ODOT District:</b>   | 12                   |
| <b>Funding Source:</b>  | Federal              |

### C2 Section

#### Project Description:

Replace the Old Highland Road Bridge over Euclid Creek in the Euclid Creek Reservation in the Cleveland Metroparks in Cuyahoga County. Municipal Bridge Project. SFN 1890956.

No right-of-way is required for this project. Utility impacts are unlikely.

Construction will require Maintenance of Traffic Plan (MOT).

Ecological impacts. Stream 1 (Euclid Creek), perennial, WWH; 453 feet located in the Study Area, 405 feet of impacts. Stream 1 will be impacted from the replacement of Old Highland Road Bridge and the placement of RCP during construction. There are 0.22 acres of bat habitat tree removal for this project, bat coordination with USFWS was required, coordination was completed on 05/06/25. The project is not located within USFWS bat buffers. Trees will be cleared between October 1 and March 31 to protect these species during their summer roosting period. There is no suitable habitat for any other federally or state listed species within the project areas. All practicable measures have been considered and incorporated into the project design to minimize the impacts to Stream 1 as best as possible. A mussel survey and relocation of found mussels will occur prior to construction. Permit Determination Request (PDR) is pending.

Cultural Resources: Old Highland Road Bridge is a later example of T-Beam bridges in Ohio with the earliest extant example dating to 1908 in Tuscarawas County (SFN 7935668). There are approximately 435 T-Beam structures that have been inventoried and evaluated in ODOT's Historic Bridge Inventory dating from 1907-1960, with seven determined eligible for the NRHP. ODOT's 2008 *Phase 1A* report for the 2010 Update stated: *T beam bridges are a common bridge type in the study population with approximately 400 examples dating from circa 1905-1961. In Ohio, it is the early and complete prototypical examples, mostly dating prior to 1921, that best represent the T beam's technological significance. There are approximately 30 examples dating prior to 1921 in the study.* No other pre-1976 aboveground resources are located in the APE. The presence of intact archaeological deposits is not likely due to sloping streambank and previous park construction disturbances. No further cultural resource investigations are required.

OES determination that no historic properties affected is the appropriate finding for the bridge replacement. The heavily deteriorated 1938 T beam is a later example of its type and not a candidate for NRHP consideration within the context of Ohio's T beam bridge technology (see photo compilation in cultural resources file). Therefore, it does not qualify for the NRHP based on its date and condition. No other pre-1976 properties will be altered by the work and the presence of intact archaeological deposits is unlikely based on the streambank deposits and previous construction disturbances. The existing stone parapet railings will be reused on the new bridge. The project will improve safety at this crossing by providing an upgraded bridge and keep the stone railings, which will retain the rustic "parkitecture" setting and feeling of the area. The APE is limited to the bridge and adjacent work areas, which is essentially within the existing park right-of-way. Therefore, in accordance with the Section 106 Programmatic Agreement (Agreement No. 38503) Sipulation V. C(2)(a) and 36 CFR § 800.4(d)(1) OES determined that No Historic Properties Affected is the finding for the parkway bridge crossing safety improvement.



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The project is located in a regulated floodplain, Zone A, therefore coordination is required. An email was sent out on April 17, 2025, from the Cleveland Metroparks to the City of Euclid, supplying Aerial Map, FEMA map, Letter, and Stage 1 Plans. Concurrence is pending. Floodplain Coordination will be uploaded to EnviroNet before Plan File on 02/13/2026. Floodplain Coordination will be found in the Project File under Permits/Floodplain.

Regulated Materials Review Screening was created by Cody Flynn of S&ME. Based on findings, no further RMR or special material management is warranted. Corey Czinger, ODOT District 12 Environmental Specialist 3 approved Regulated Materials Review on 02/14/25.

A Section 4(f)/6(f) Determination Request Form for Recreational Properties (DRF) was submitted to ODOT-OES Policy Staff on April 21, 2025. Based upon review of the DRF it was determined the proposed project can be processed 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 Euclid Creek Reservation. The determination was made based on the proposed scope of work and concurrence received from the Official with Jurisdiction (OWJ) regarding the assessment of impacts that are included in the DRF. No further Section 4(f) coordination is required at this time. A re-evaluation of Section 4(f) impacts may be required if changes to the proposed scope of work alter the degree of impacts to Euclid Creek Reservation. Furthermore, all appropriate environmental commitments related to measures to minimize harm and/or resulting mitigation should be listed accordingly in the environmental document. Section 6(f) impacts - NPS agreed to the temporary non-conforming use determination for the Old Highland Road Bridge replacement on May 19, 2025. Section 4(f) and 6(f) coordination can be found in the Project File under Section 4(f) and Section 6(f).

No other environmental impacts will result from this project.

Press Release from the Cleveland Metroparks was sent out on April 16, 2025. Stakeholder Notification letter was sent out on April 16, 2025. No comment were received. Press Release and Stakeholder Notification Letter can be found in the Project File under Public Involvement/Project Information. ODOT has determined to proceed with the project as currently designed.

Construction: \$2,129,495.00: 80% federal and 20% local.

The project has been designed by Wallace & Pancher, Inc.

The environmental documentation and associated studies are being approved using Stage 1 design. A copy of the plans is included in the project file.

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

**Ellis STIP Details**

| Phase | Current STIP Reference |
|-------|------------------------|
| ENV   | 119874: 24-27 STIP     |
| CO    | 119874: 24-27 STIP     |
| DD    | 119874: 24-27 STIP     |

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

**Select the appropriate project type:**

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



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**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

**Waterways Permit Type:** Permit Determination and/or Permit Application Approval Pending

**Isolated Wetland Permit** No

**Will any wetlands be impacted?** No

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

| Species Common Name     | Species Scientific Name       | Listing Status      | Most Recent Coordination Date |
|-------------------------|-------------------------------|---------------------|-------------------------------|
| Indiana Bat             | <i>Myotis sodalis</i>         | Endangered          | 05/06/2025                    |
| Northern Long-eared Bat | <i>Myotis septentrionalis</i> | Endangered          | 05/06/2025                    |
| Tricolored Bat          | <i>Perimyotis subflavus</i>   | Proposed Endangered | 05/06/2025                    |

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



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| Species Common Name | Species Scientific Name         | Listing Status     | Most Recent Coordination Date |
|---------------------|---------------------------------|--------------------|-------------------------------|
| Bald Eagle          | <i>Haliaeetus leucocephalus</i> | Species of Concern | 05/06/2025                    |
| Piping Plover       | <i>Charadrius melodus</i>       | Endangered         | 05/06/2025                    |
| Rufa Red Knot       | <i>Calidris canutus rufa</i>    | Threatened         | 05/06/2025                    |

**Endangered Species Remarks:**

No endangered species will be impacted by the project.

**Scenic Rivers**

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

**Scenic Rivers Remarks**

No scenic rivers within 1000-feet of the project.

**Floodplains**

**100-Year Floodplain:**

No Encroachment Within a Special  
Flood Hazard Area (SFHA)

**Floodplain Remarks**

The project is located in a regulated floodplain, Zone A, therefore coordination is required. An email was sent out on April 17, 2025, from the Cleveland Metroparks to the City of Euclid, supplying Aerial Map, FEMA map, Letter, and Stage 1 Plans. Concurrence is pending. Floodplain Coordination will be uploaded to EnviroNet before Plan File on 02/13/2026. Floodplain Coordination will be found in the Project File under Permits/Floodplain.

**Section 4(f)**

**Section 4(f):**

Present; No Impacts and/or Access  
Restrictions

**Section 4(f) Remarks**

A *Section 4(f)/6(f) Determination Request Form for Recreational Properties (DRF)* was submitted to ODOT-OES Policy Staff on April 21, 2025. Based upon review of the DRF it was determined the proposed project can be processed 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 Euclid Creek Reservation. The determination was made based on the proposed scope of work and concurrence received from the Official with Jurisdiction (OWJ) regarding the assessment of impacts that are included in the DRF.

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

Section 6(f) impacts - NPS agreed to the temporary non-conforming use determination for the Old Highland Road Bridge replacement on May 19, 2025.

Section 4(f) and 6(f) coordination can be found in the Project File under Section 4(f) and Section 6(f).

**Section 6(f)**



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**Section 6(f):** Present; No 6(f) Conversion Required

**Section 6(f) Determination:** Temporary Non-Conforming Use

**Section 6(f) Determination Date:** 05/19/2025

### Cultural Resources

**Cultural Resources:** Present; No Finding of Adverse Effect

**Cultural Resources Coordination:** No Historic Properties Affected

**Cultural Resources Coordination - ODOT Approval/SHPO Concurrence Date** 04/09/2025

### Cultural Resources Remarks

Cultural Resources: Old Highland Road Bridge is a later example of T-Beam bridges in Ohio with the earliest extant example dating to 1908 in Tuscarawas County (SFN 7935668). There are approximately 435 T-Beam structures that have been inventoried and evaluated in ODOT's Historic Bridge Inventory dating from 1907-1960, with seven determined eligible for the NRHP. ODOT's 2008 *Phase 1A* report for the 2010 Update stated: *T beam bridges are a common bridge type in the study population with approximately 400 examples dating from circa 1905-1961. In Ohio, it is the early and complete prototypical examples, mostly dating prior to 1921, that best represent the T beam's technological significance. There are approximately 30 examples dating prior to 1921 in the study.* No other pre-1976 aboveground resources are located in the APE. The presence of intact archaeological deposits is not likely due to sloping streambank and previous park construction disturbances. No further cultural resource investigations are required.

OES determination that no historic properties affected is the appropriate finding for the bridge replacement. The heavily deteriorated 1938 T beam is a later example of its type and not a candidate for NRHP consideration within the context of Ohio's T beam bridge technology (see photo compilation in cultural resources file). Therefore, it does not qualify for the NRHP based on its date and condition. No other pre-1976 properties will be altered by the work and the presence of intact archaeological deposits is unlikely based on the streambank deposits and previous construction disturbances. The existing stone parapet railings will be reused on the new bridge. The project will improve safety at this crossing by providing an upgraded bridge and keep the stone railings, which will retain the rustic "parkitecture" setting and feeling of the area. The APE is limited to the bridge and adjacent work areas, which is essentially within the existing park right-of-way. Therefore, in accordance with the Section 106 Programmatic Agreement (Agreement No. 38503) Sipulation V. C(2)(a) and 36 CFR § 800.4(d)(1) OES determined that No Historic Properties Affected is the finding for the parkway bridge crossing safety improvement.

**Tribal Consultation Summary/Remarks:** No comments received.

### Environmental Resources Considered

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

Noise

Regulated Materials

**Air Remarks**



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The project type of 'replacement of the Old Highland Road Bridge over Euclid Creek in the Euclid Creek Reservation in the Cleveland Metroparks in Cuyahoga County' is considered insignificant from an air quality conformity perspective, as per 40 CFR 93.126. Therefore, the project is exempt from air quality coordination.

**Noise:** Studies Not Required

**Noise - Coordination with OES** No

**Noise Remarks**

The project is a replacement of the Old Highland Road Bridge over Euclid Creek in the Euclid Creek Reservation in the Cleveland Metroparks in Cuyahoga County project. The project will not increase the traffic or traffic noise. Therefore, no noise analysis is required. The No Noise Analysis Required District Determination can be found in the Project File Under Noise/Project Information. District approval date 04/02/25.

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

**Regulated Materials Review Screening:**

No Further Regulated Materials Review

**Regulated Materials Review Screening - DEC/OES Approval Date:** 02/14/2025

**Regulated Materials Review Remarks:**

Regulated Materials Review Screening was created by Cody Flynn of S&ME. Based on findings, no further RMR or special material management is warranted. Corey Czinger, ODOT District 12 Environmental Specialist 3 approved Regulated Materials Review on 02/14/25.

**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 |
|----------------------|------------|--------------|
| N/A                  | N/A        | N/A          |

**Environmental Justice Remarks**

As of January 21, 2025, EO 12898 was revoked. Therefore, no discussion and/or analysis specific to Environmental Justice Populations (Minority & Low-Income) will be provided in the Environmental Analysis. Instead, any potential impacts will be addressed through the Public Involvement Process.

**Public Involvement**



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**Public Involvement:**

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

**Public Involvement Remarks**

Press Release from the Cleveland Metroparks was sent out on April 16, 2025. Stakeholder Notification letter was sent out on April 16, 2025. No comment were received. Press Release and Stakeholder Notification Letter can be found in the Project File under Public Involvement/Project Information. ODOT has determined to proceed with the project as currently designed.

**Environmental Commitments**

**Environmental Commitments**

Yes



## Environmental Commitments

### C2

- 1) Asbestos Survey needs to be completed before Plan File on 02/13/2026.
- 2) Floodplain Coordination needs to be completed before Plan File on 02/13/2026.
- 3) The Cleveland Metroparks will obtain all appropriate waterway permits before the Plan File date and prior to any work with the jurisdictional boundary of any waterway, including wetlands, and all applicable waterway permit conditions will be included in the plans and adhered to during construction.
- 4) A mussel survey and relocation of found mussels will occur prior to construction.
- 5) The Project Designer shall incorporate the following note into the plans: NO TREES SHALL 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 FEDERALLY AND STATE LISTED BAT SPECIES AS REQUIRED BY THE ENDANGERED SPECIES ACT. FOR THE PURPOSE OF THIS NOTE, A TREE IS DEFINED AS A LIVE, DYING, OR DEAD WOODY PLANT WITH A TRUNK THREE INCHES OR GREATER IN DIAMETER AT A HEIGHT OF 4.5 FEET ABOVE THE GROUND SURFACE, AND WITH A MINIMUM HEIGHT OF 13 FEET.
- 6) Tree Removal AMM 1: Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to avoid tree removal in excess of what is required to implement the project safely.
- 7) Tree Removal AMM 3. Ensure tree removal is limited to that specified in project plans by clearly marking clearing limits. Ensure that contractors understand clearing limits and how they are marked in the field.
- 8) The Contractor shall always maintain safe access to Euclid Creek Reservation during construction activities, except for the area within the proposed construction limits.
- 9) Prior to the start of construction activities, the Contractor shall install signage approved by the Engineer to alert Euclid Creek Reservation users of construction activities and access restrictions or closures.
- 10) Temporary construction fencing shall be installed along proposed construction limits prior to the start of construction activities to protect the existing Section 4(f) property and the public.
- 11) Euclid Creek Reservation property will be restored to a condition which is at least as good as that which existed prior to the project.
- 12) The Contractor shall provide the construction schedule to ODOT and Cleveland Metroparks 30 days prior to the start of construction activities.



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### **Preparers and Approvals**

**Form Preparer:** Cody Flynn  
S&ME, Inc.  
862 E Crescentville Road, Cincinnati OH 45246  
218-216-5323  
cflynn@smeinc.com

**Supporting Form Preparer(s):** Corey Czinger  
Thomas Sorge  
Cody Flynn

### **Approvals & Electronic Signatures**

|   |                       |
|---|-----------------------|
| <b>Approved &amp; Electronically Signed By:</b> | <b>Approval Date:</b> |
| Thomas Sorge (PROGRAM ADMIN 3)                  | 5/19/2025             |



## Appendix

### General

Aerial Map.pdf

County Map.pdf

USGS Quadrangle Topographical Map.pdf

### RMR

Asbestos Survey-Lab Results.pdf

RMR Screening Approval - District Determination.pdf

RMR Screening.pdf

### Cultural Resources

Records Check.pdf

SHPO Comments

Transmittal 1 - Effect Determination

Tribal Consultation

Tribal Consultation - Correspondence List and Example.pdf

### Ecological

ODNR Comments

ODNR Scenic River MOA Conditions

USFWS/ODNR Ecological MOA Conditions

### Other Resources

Site Specific Resource Mapping.pdf

Sole Source Aquifer Mapping.pdf

### Section 4(f)

OES Recreational 4(f) Determination.pdf

Section 4(f) OWJ Concurrence Letter.pdf

### Section 6(f)

Coordination with ODNR - Temporary Non-Conforming Use.pdf

LWCF Grant Listing.pdf

NPS Approval - Temporary Non-Conforming Use.pdf

### Public Involvement



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Press Release.pdf

Public Comments Page - No Comments Received.pdf

Stakeholder Notification.pdf

**Permits**

FEMA FIRM.pdf