



# OHIO DEPARTMENT OF TRANSPORTATION

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

## **Environmental Document**

for

## **D12 MNT FY2026 Tree Removal PID 122334**

**Environmental Document Level: C2**

**Approved: 4/11/2025**

**Prepared By: District 12**

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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**

**PID:** 122334  
**Project Sponsor:** ODOT SPONSORING AGENCY  
**ODOT District:** 12  
**Funding Source:** Non-Federal

**C2 Section**

**Does this project require a Federal permit or approval?** No

**Project Description:**

General tree and brush clearing throughout the District, 34 different locations in in Geauga, Cuyahoga and Lake Counties. This project only involves the removal of trees that pose a hazard to the traveling public along county roads along with general shrub clearing for visibility. All of the trees are located within the current roadway right-of-way and no excavation or stump removal will occur.

This project only involves the removal of trees that pose a hazard to the traveling public along county roads along with general shrub clearing for visibility. Locations will not be clear cut.

Per the Project Engineer, the tree removal work being done adjacent to a 2-lane road will most likely be done on the roadway's shoulder and, therefore, will not require equipment to leave the pavement. Cut trees will not be dragged, felled, or placed on any natural ground. On roads wider than 2-lanes, it is possible that equipment will have to work off of the roadway and cut trees will be placed off the pavement. These conditions are dependent on the hired contractor's methodology.

The trees are located within the current roadway right-of-way. Stage 3 Design Plans lists how many acres of land and the locations that identified of trees in need of removal at each location. Impacts include cutting of suitable wooded habitat for the federally listed Indiana bats and Northern long-eared bat, tricolor and state endangered little brown bats. All trees are located within 100 ft of the edge of pavement. Level 1 ESR impacts were based off a "worst-case scenario" and coordinated with the full acreage of each location, even though only selective clearing will occur. To avoid impacts to bat foraging and swarming activities, SWH will be cleared only between October 1 and March 31, when bats would be hibernating. As proposed this project should not impacts any other federal listed species. The Pennsylvania Hawthorn (*Crataegus pennsylvanica*), a state endangered species is likely to be impacted. A plant survey was performed on 2/28/2025 for any species of hawthorn within the project area. Trees that appears to be a hawthorn was identified but not speciated due to the survey being outside of growing season. To confirm, ODOT, along with a botanist suggested by ODNR DNAP, will do a follow-up survey when the trees are flowering and fruiting. Any measures identified during the survey will be incorporated in the project plans in the General notes. Further, no streams, ponds, ditches, or lakes will be impacted by this project. Wetlands are not anticipated to be impacted due to the tree removal process taking place mostly from the pavement or upland shoulders.

A review was performed by district environmental staff Megan Romanchok, Environmental Specialist 2, using the online OSHPO ArcMap Resource Map. The undertaking is a type which has minimal potential to cause effects to historic properties. No further coordination is required in accordance with ORC 149.53 Appendix A.

There will be no deep excavation on this project, and it is OAC Rule 3745-513 exempt as 15.) Tree removal without disturbance to roots \*as of February 17, 2023.

100% State funding \$375,000

C2 is based on Stage 3 Design Plans and can be found in the Project File/General/Project Information/Stage 3 Design.



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

Yes

**Ellis STIP Details**

Phase	Current STIP Reference
CO	122334: 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.)**

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.**



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**Ecological**

**Waterways:**

Not Present

**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	04/09/2025
Northern Long-eared Bat	<i>Myotis septentrionalis</i>	Endangered	04/09/2025
Tricolored Bat	<i>Perimyotis subflavus</i>	Proposed Endangered	04/09/2025

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

Species Common Name	Species Scientific Name	Listing Status	Most Recent Coordination Date
Bald Eagle	<i>Haliaeetus leucocephalus</i>	Species of Concern	04/09/2025
Eastern Massasauga	<i>Sistrurus catenatus</i>	Threatened	04/09/2025
Piping Plover	<i>Charadrius melodus</i>	Endangered	04/09/2025
Round Hickorynut	<i>Obovaria subrotunda</i>	Threatened	04/09/2025
Rufa Red Knot	<i>Calidris canutus rufa</i>	Threatened	04/09/2025
Salamander Mussel	<i>Simpsonia ambigua</i>	Proposed Endangered	04/09/2025
Snuffbox	<i>Epioblasma triquetra</i>	Endangered	04/09/2025

**Endangered Species Remarks:**

Small Yellow Lady's Slipper

This project is a tree clearing project that will remove hazard trees within ODOT right-of-way. There are no anticipated wetland impacts. The small yellow lady's-slipper (*Cypripedium parviflorum var. makasin*) plant can grow in full sun, therefore, opening the canopy will not harm this species. Tree clearing will not dig up any individuals nor will it dig up soils. As proposed this project is not likely to impact the small yellow lady's-slipper.

Crataegus pennsylvanica

The Division of Natural Areas and Preserves (DNAP) staff have reviewed the ESR associated with ODOT District 12's Cuyahoga County FY2026 proposed tree removal project (PID 122334). In the report, it is noted that a plant survey was conducted in February of 2025, *Crataegus pennsylvanica* was potentially identified within the area of impact and ODOT will be conducting another survey during growing season to confirm its presence or absence. To properly identify rare hawthorns, such as *Crataegus pennsylvanica*, flowering and fruiting material must be present to make an accurate identification. Even during growing season, accurate identification is exceptionally difficult and DNAP staff ask that either John Reinier with Cleveland Metroparks or DNAP's Chief Botanist, Rick Gardner, conduct the survey. For survey coordination or further discussion, please contact Mr. Gardner at richard.gardner@dnr.ohio.gov or 614/265-6419.

Baltic Rush and Smooth Blackberry

Baltic Rush favors wetland areas and is always associated with calcareous or brackish environments. This project will have no impact to wetland or, calcareous or brackish environments. Smooth blackberry occurs in forests, and this is a selective tree clearing project that will not impact forests.



**Scenic Rivers**

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

**Scenic Rivers Remarks**

This project previously was surveyed for locations within 1000' of the Chagrin River and coordination with ODNR did occur on 2-12-2025. However, the location was removed from Stage 3 Plans and no tree clearing will be occur within the 1000' Scenic River Buffer as a part of this project.

**Floodplains**

**100-Year Floodplain:**

No Encroachment Within a Special  
Flood Hazard Area (SFHA)

**Floodplain Remarks**

The project will cut trees and will not involve fill or excavation within a FEMA designated Floodplain.

**Section 4(f)**

**Section 4(f):**

Not present

**Section 4(f) Remarks**

Tree cutting will occur with ODOT Right-of-way and the project is 100% State Funded. Tree removal will not restrict access to Section 4(f) projects.

**Section 6(f)**

**Section 6(f):**

Not present

**Cultural Resources**

**Cultural Resources:**

Not Present

**Cultural Resources Coordination - ODOT Approval/SHPO  
Concurrence Date**

04/07/2025

**Cultural Resources Remarks**

A review was performed by district environmental staff Megan Romanchok, Environmental Specialist 2, using the online OSHPO ArcMap Resource Map. The undertaking is a type which has minimal potential to cause effects to historic properties. No further coordination is required in accordance with ORC 149.53 Appendix A.

**Environmental Resources Considered**

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

Regulated Materials

Farmland



**Air Remarks**

The project type of 'planting, landscaping, ect.'" 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 Remarks**

The project is not a Type I project for noise, add an auxiliary lane or does not add capacity a new highway on new location. The project will not significantly change the horizontal or vertical alignment. Therefore, a noise analysis is not required.

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

**Hazardous Materials - OES Approval Date:** 02/25/2025

**Regulated Materials Review Remarks:**

This Project falls under the ODOT Activities Exempt From OAC Rule 3745-515, the RMR Screening form can be found at Project File> RMR> RMR Screening Form. No excavation will occur. No ROW will be required for this project.

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

**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**

**Public Involvement**

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

**Public Involvement Remarks**

*The District 12 Public Information Office coordinates the yearly construction schedule and lane closures in press releases.*

**Environmental Commitments**

**Environmental Commitments** Yes



## Environmental Commitments

### C2

- 1) 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.
- 2) Tree Removal AMM 2(a) (OH PBO: A-1). Time of year restrictions for tree removal when bats are not likely to be present - To avoid impacts to summer roosting bats, SWH will be cleared only between 1 October and 31 March, when the species would not be present.
- 3) Tree Removal AMM 3. Ensure tree removal is limited to that specified in the project plans by clearly marking clearing limits, ensure that all contractors understand clearing limits and how they are marked in the field.
- 4) Due to the possible disruption of the Pennsylvania Hawthorn, *Crataegus pennsylvanica*, a survey of the proposed project area will be conducted by ODOT staff and an ODNR DNAP recommended botanist prior to construction. ODOT will implement the ODNR recommended measures if the species is found.



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**Preparers and Approvals**

**Form Preparer**

District 12  
Contact: Thomas Sorge  
216-584-2086  
Tom.Sorge@dot.ohio.gov

**Supporting Form Preparer(s):** Megan Romanchok

**Approvals & Electronic Signatures**

Approved & Electronically Signed By:	Approval Date:
Thomas Sorge (PROGRAM ADMIN 3)	4/11/2025



## **Appendix**

### **Ecological**

ODNR Comments

ODNR Scenic River MOA Conditions

USFWS/ODNR Ecological MOA Conditions