



OHIO DEPARTMENT OF TRANSPORTATION

DISTRICT 04
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Environmental Document

for

MAH SR 0616 02.73 (Struthers) PID 119820

Environmental Document Level: C2

Approved: 9/4/2025

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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

C2 Section

PIDs	119820
Project Sponsor	Struthers, City of
ODOT District	4
Funding Source	Federal
Project Description:	



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The city of Struthers proposes roadway and pedestrian improvements within the city limits. These improvements will be along Lowellville Road between Perry Street and Bridge Street, along State Street between Bridge Street and Park Avenue, and along Bridge Street (State Route 616) between Terrace Street and Bob Cene Way. The proposed improvements include curb extensions, existing walk/curb removal/replacement, curb ramp reconstruction and new curb ramp installations to comply with the Americans with Disabilities Act (ADA) standards at the Bridge Street/Lowellville Road, State Street/Bridge Street, Main Street/Bridge Street, Liberty Street/Bridge Street and Bob Cene Way/Bridge Street intersections.

Additional improvements include driveway apron reconstruction, storm water drainage system improvements and the reconstruction of the existing traffic signal at the State Street/Bridge Street intersection including mast arms, cabinets, controller units, vehicle and pedestrian detection, pedestrian and vehicle signal heads, and communications. Moreover, the project proposes traffic control sign replacements and the restriping of Lowellville Road, Bridge Street and State Street to accommodate a 5-foot-wide bike lane in each direction as well as the application of new center/stop/channelizing/transverse-diagonal/crosswalk/dotted lines and other pavement markings.

Mapping that depicts the project location is included in the Project File/General/Project Information subsection.

Lane restrictions will be required to allow for construction; part-width construction will be used to maintain traffic and a full road closure is not required during project construction. Access shall be maintained to all adjacent properties, businesses, and intersecting side streets for the duration of the project. Substantial traffic disruptions are not expected during project construction. Permanent and temporary right-of-way will be needed within the project limits. Permanent right-of-way is necessary to construct curb ramps and reconstruct sidewalks at multiple locations and temporary right-of-way will be needed to reconstruct a driveway. Land from the Gabriel parcel (38-005-0-193.00-0) will be used during the course of the project. The city of Struthers reserves an easement over the entire Gabriel parcel (38-005-0-193.00-0) for the operation and maintenance of existing utilities and streets or for the construction, operation, maintenance of future improvements as deemed necessary by the city. Land will also be used from the RLJRAJ Enterprises LLC parcel (38-005-0-172.00-0) located in the southwest corner of the intersection of Bob Cene Way and S. Bridge Street, via Sidewalk Ordinance No. 25-029, and the grassy median in the northwest corner of the intersection of Bob Cene Way and S. Bridge Street. Total takes of private property and/or relocations are not proposed to construct the project.

A copy of the Final Right-of-Way Plans for the project is included in the Project File/General/Project Information subsection.

Minor relocations of existing utilities within the project study area will be necessary to construct the project. These minor utility relocations will occur within the existing and proposed new permanent roadway right-of-way. Utilities will not be permanently removed to construct the project. Coordination with the utility companies in proximity to the proposed construction activities was conducted for the project during its preliminary engineering phase and will continue during its detailed design phase.

The project will not impact any environmentally sensitive resources within the project study area as detailed in the narrative below and the resource-specific subsections and tabs.

The project will not impact ecological resources and is considered ecologically exempt. See the ecological documentation for the project in the Project File/Ecological/Project Information and Reports subsections and the Ecological tab.

The environmental document and associated studies, as applicable, were approved using the Stage 2 Design Plans and Final Right-of-Way Plans for the project. A copy of the Stage 2 Design Plans and Final Right-of-Way Plans for the project is included in the Project File/General/Project Information subsection.

The total project costs specified in Ellis is less than the total project cost specified in ODOT's Fiscal Year (FY) 2026-2029 Statewide Transportation Improvement Program (STIP) therefore a STIP amendment is not required for the project.

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

Yes

Ellis STIP Details

Phase	Current STIP Reference
ENV	On Previous STIP
CO	119820: 26-29 STIP
DD	119820: 26-29 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.)**

(27) Highway safety or traffic operations improvement projects, including the installation of ramp metering control devices and lighting, if the project meets the constraints in paragraph (e) of this section. *Examples include: Lane reduction ("road diet") changes provided traffic analysis is completed; Railroad projects that close at-grade crossings to improve safety or traffic operations.*

In accordance with 23 CFR 771.117(e), the proposed project cannot be processed as a C2 CE, if it involves - a. Acquisition of more than a minor amount of ROW (exceeds strip takes) b. Residential or non-residential displacements c. A U.S. Coast Guard permit or an Individual Section 404 permit under the Clean Water Act d. A Section 106 finding of Adverse Effect e. Section 4(f) impacts greater than de minimis f. A finding of May Affect, Likely to Adversely Affect to Threatened and Endangered Species g. Construction of temporary access, or the closure of existing road, bridge, or ramps, that would result in major traffic disruptions h. Changes in access control 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) 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 k. No minor public or agency controversy on environmental grounds (no opposition from any organized groups or agencies and no unresolved environmental coordination) l. Substantial Community Impacts (if a Community Impact Assessment is required, contact OES for guidance). 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: Not Present

Will any wetlands be impacted? No

The identified Federally Listed Species for the project received an effect determination of No Effect.

Endangered Species Remarks:

The project will have no effect on, or is not likely to result in impacts to, any Federally or state listed threatened and endangered species. See the threatened/endangered species documentation for the project in the Project File/Ecological/Reports subsections and the Ecological tab.

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

Scenic Rivers Remarks

National or state-listed wild and scenic rivers are not located within 1,000 feet of the project study area. The project will not impact any scenic river.



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Floodplains

100-Year Floodplain:

No Encroachment Within a Special
Flood Hazard Area (SFHA)

Floodplain Remarks

A review of the FEMA FIRM mapping for the project study area found the proposed construction activities are not located within a designated Special Flood Hazard Area (SFHA) Zone AE floodplain. See the floodplain mapping and documentation for the project in the Project File/Permits/Floodplains subsection.

Section 4(f)

Section 4(f):

Present; No Programmatic
Evaluation or Individual Evaluation
Required

Section 4(f) Determination:

Temporary No Use Exception - 774.13(d)

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

08/11/2025

Section 4(f) Remarks

The project is in proximity to Yellow Creek Park and the observation deck overlooking Yellow Creek. Yellow Creek Park is recognized as a recreational property and as such is afforded protection from adverse impacts. The observation deck on the corner of S Bridge St and Lowellville Rd overlooking Yellow Creek will be temporarily closed to construct the proposed improvements. Work in this area includes sidewalk replacement and widening, curb ramps, and bike lane striping.

A Section 4(f)/6(f) Determination Request Form for Recreational Properties (DRF) was submitted to ODOT-OES Policy Staff on August 6, 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 the Yellow Creek Park. 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.

All Section 4(f) documentation can be found in the Project File/Section 4(f)/Coordination, Project Information, and Reports subsections.

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 B



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

06/25/2025

Cultural Resources Remarks

A Cultural Resources Records Check was performed using the SHPO GIS database. The project is located near the Struthers US Postal Office (MAH0067610), located at 195 S. Bridge Street and the survey boundary for the Montgomery Furnace (MH0010). This project involves roadway and pedestrian improvements. No historic sidewalks, streets, curbs, or lighting exist in the APE, and no historic features associated with any of the surrounding buildings will be disturbed during the course of the project. No new permanent right-of-way will be acquired from within the historic boundary of an NRHP-listed or eligible resources, and no contributing features of an NRHP-listed or eligible resource will be altered by the project. Due to the nature of the work, and the setting, no archaeological resources will be affected by the project.

In accordance with Stipulation V(C)(1) and Appendix B of the Section 106 Programmatic Agreement among FHWA, ACHP, Ohio SHPO, ODOT, Regarding Implementation of the Federal Aid Highway Program in Ohio (Agreement No. 38503) executed June 29, 2023, ODOT-OES determined that "minimal potential to cause effects" is the appropriate finding for the project. No further cultural resources coordination is required for the project. See the cultural resources documentation, including coordination, for the project in the Cultural Resources tab.

Tribal Consultation Summary/Remarks:

The Miami Tribe of Oklahoma was notified of the "minimal potential to cause effects" determination on June 25, 2025. The Miami Tribe of Oklahoma did not respond within the 30-day comment period. See the tribal coordination for the project in the Cultural Resource tab and in the Project File/Cultural Resources/Coordination subsection.

Environmental Resources Considered

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

Regulated Materials

Air Remarks

Air quality studies or coordination are not required for this project. The project is an exempt project per 40 CFR 93.126 [Exempt projects, Air Quality: Projects that correct, improve, or eliminate a hazardous location or feature]. 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 through 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:**

Yes - Screening

Regulated Materials Review Screening:

No Further Regulated Materials Review

Regulated Materials Review Screening - DEC/OES Approval Date:

08/04/2025

Regulated Materials Review Remarks:



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Based on the information in the Regulated Materials Review (RMR) Screening 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.

Public Involvement

Public Involvement:

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

Public Involvement Remarks

The city of Struthers conducted a virtual public open house and comment period on a dedicated project website (www.cityofstruthers.com/downtown-safety-improvements.html). The purpose of this virtual public open house was to provide an overview of the project history and gather feedback from the public. The webpage included links to a project handout, exhibits and a form for submitting comments through Google Forms.

Letters and emails sent on May 23, 2025, to property owners, residents, and stakeholders in and around the project were invited to view the virtual open house and submit comments. The notifications provided a project description, a summary of the project's purpose and need, and an invitation to view additional materials online and submit comments. A comment form was included for those preferring to comment via mail.

The comment period began on May 23, 2025, and closed on June 27, 2025. During this period, 14 comments were received by the city. Concerns included truck traffic, signals and parking. Comments were also received in support of the project. All comments were responded to by email on an individual basis. Additional comments were received during an in-person site visit on May 20, 2025, with a property owner in the project study area who expressed concerns about pedestrian safety along the sidewalk in front of his property in the case of a roadway departure due to the alignment of the three-approach Bridge Street/Lowellville Road intersection and existing drainage problems that impact the sidewalk. The city responded to those comments by stating the project will be revised to include bollards in front of that property to protect pedestrians from errant vehicles and the resulting additional sidewalk work will seek to not worsen but improve any drainage issues.

The project announcements were picked up by two local news affiliates that published news articles about the project.

See the public involvement documentation, including the received comments and responses to comments, for the project in the Project File/Public Involvement/Project Information subsection.

Environmental Commitments

Environmental Commitments

Yes



Environmental Commitments

C2

- 1) The project designer shall incorporate the following note into the plans. Access to Yellow Creek Park shall be maintained at all times. Access to Yellow Creek Park Observation Deck shall be maintained at all times, except for the time needed to temporarily occupy the area, which shall be less than the time needed for construction of the project.
- 2) The project designer shall incorporate the following note into the plans. Appropriate signage shall be installed to alert users of Yellow Creek Park Observation Deck of construction activities, access restrictions or closures, and to direct users to secondary access points.
- 3) The project designer shall incorporate the following note into the plans. The contractor shall be required to closely coordinate the construction schedule with ODOT, Mill Creek MetroParks and the city of Struthers prior to the start of construction activities.



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Preparers and Approvals

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Approvals & Electronic Signatures

Approved & Electronically Signed By:	Approval Date:
Edward Deley (PROGRAM ADMIN 3)	9/4/2025



Appendix

General

2026-2029 STIP Listing.pdf

Aerial Map.pdf

County Map.pdf

Final Right of Way Plans.pdf

USGS Quadrangle Topographical Map.pdf

Air

District Determination - No Air Analysis Required.pdf

RMR

OES Review - Screening.pdf

Regulated Materials Review Form.pdf

Cultural Resources

Minimal Potential to Cause Effect - Appendix B

Records Check.pdf

Ecological

ODNR Scenic River MOA Conditions

Other Resources

Census Bureau Urbanized Area Map.pdf

Water Source Protection Area Map.pdf

Well Log Data.pdf

Section 4(f)

OES Recreational 4(f) Determination.pdf

Public Involvement

News Article - 21 WFMJ News.pdf

News Article - WKBN News.pdf

Project Website Response to Comments Verification.pdf

Public Comments Received.pdf

Response to Public Comments.pdf

Virtual Open House - Stakeholder Notification and List.pdf



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Virtual Public Open House - Comment Form.pdf

Virtual Public Open House - Exhibits.pdf

Virtual Public Open House - Facebook Notification.pdf

Virtual Public Open House - Handout.pdf

Virtual Public Open House - Notification Letter and List.pdf

Virtual Public Open House - Press Release.pdf

Virtual Public Open House - Project Website.pdf

Permits

FEMA FIRM.pdf