



# OHIO DEPARTMENT OF TRANSPORTATION

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

## **Supplemental Re-Evaluation** for **CUY CLEVELAND TOWPATH TRAIL Ph 4 PID 87075** Environmental Document Level: D1

**Approved: 3/10/2021**

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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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**Re-evaluation Level**

**Explain why a re-evaluation is needed?**

Additional work added to construct trail head at a Canal Basin Park. It will be added as CUY-Towpath Trail Phase 4 Trail head (PID 113726). All proposed work is within the original study area. Need to confirm there will be no new impacts from proposed work.



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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



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### General Project Information

#### Project, Cost Schedule and Work Limits

Environmental Document Levels:	D1
PIDs:	87075, 113726
Project Name:	CUY CLEVELAND TOWPATH TRAIL Ph 4
Project Sponsors:	CUYAHOGA COUNTY ENGINEER, Cleveland, City of
ODOT District:	12
Funding Source:	Federal
Private Funding:	No
Local Public Funding:	Yes
STIP Reference #:	113726: 21-24 STIP
The next phase of the proposed project is listed on the STIP	Yes
The current cost estimate is in line with existing federal procedures for Ohio STIP Amendments and Administration Modifications	Yes
Planning and Engineering:	\$370,571.00
Right of Way:	\$1,509,108.00
Construction:	\$10,743,602.65
Other:	\$0.00
An Interchange Modification/Justification/Operations Study (IMS/IJS/IOS) was completed	No

#### Project Description:

The proposed project will extend the existing Towpath Trail located in Cleveland, Ohio along the Cuyahoga River corridor. The Phase 4 portion of the Towpath Trail Extension is a 1.5 mile long segment beginning just south of Literary Avenue from the end of Phase 3 to just north of Center Street/Canal Road intersection. The paved trail will be located on a combination of off-road trails and existing roadway right-of-ways. Trail components may include green space and trailhead parking. The trail will connect with portions of the Phase 4 Towpath Trail Extension that have been constructed as part of the CCG1/CCG2 Projects and the CUY-AOC Urban Riparian Restoration Project.

#### Re-evaluation:

CUY-Towpath Trail Ph4 Trailhead (PID 113726) will add a trailhead to the original plans. The project area for the new trailhead is completely within the footprint of the study area for CUY-Towpath Trail Ph4 (PID 87075) that was approved as D1 on 10/24/2017. Each environmental discipline has been reviewed and is documented



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in this Re-evaluation document.

The Trailhead will not create any new ecological impacts. The original environmental commitment to restrict tree removal to between October 1st and March 31st will be implemented in construction.

<b>Limits of Proposed Work:</b>	N/A & Cleveland: Towpath Trail Canal Basin Trailhead
<b>Start (SLM):</b>	Literary Road
<b>End (SLM):</b>	Merwin Avenue
<b>Total Work Length (Miles):</b>	1.5

No roadway data for PIDs associated with this CE Form

No bridge data for PIDs associated with this CE Form

**Maintenance of Traffic During Construction**

A roadway, bridge or ramp closure is required Yes

A temporary bridge or roadway is proposed No

A detour is required for the proposed project Yes

Access for local through traffic will be provided with appropriate signage Yes

Provisions for through-traffic dependent businesses will be incorporated into project design Yes

Provisions to accommodate any local special events or festivals will be incorporated into project design Yes

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:**

Construction of the Towpath Trail requires permanent closure of University Avenue between West 1<sup>st</sup> Street and West 5<sup>th</sup> Street. Access to (former) University Avenue along the Towpath Trail for authorized vehicles during and after construction will be maintained. Access to residential and commercial driveways through the project area shall be maintained during construction, and pedestrian access will be maintained through pedestrian detours. Through use of part-width construction and one-way restrictions, vehicular traffic will be maintained during construction. One-way restrictions and associated detours will be in place for limited durations as needed. Preliminary coordination with emergency services and schools has been initiated for the project. Additional coordination for any necessary short term closures will occur during final design and construction.

Re-evaluation:



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Other contractors are expected to be working on projects adjacent or within the limits of this project, either for the owner or for other public/private agencies. The contractor shall cooperate and coordinate operations, including maintenance of traffic with the contractors of other projects that may be in force during the life of this contact, including ODOT's work on/under the Detroit-Superior Bridge near Merwin Avenue. The contractor shall maintain safe and satisfactory access to abutting property and will maintain adequate pedestrian walks at all intersections. Emergency services will be notified of any closures needed during construction.

**Are there any Environmental Commitments?** Yes

**Right of Way and Utility Involvement**

**The project requires Permanent Right-of-Way** Yes

**The project requires Permanent Easement(s)** Yes

**The project requires Temporary Right-of-Way** Yes

**Number of parcels impacted by Permanent Right-of-Way:** 6

**Number of parcels impacted by Temporary Right-of-Way:** 5

**Approximate acreage of Permanent Right-of-Way needed:** 1.3

**Approximate acreage of Temporary Right-of-Way needed:** 0.4

**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** Yes

**Private utility easements are located within the project area** Yes

**The existing private utility easement will be impacted by the project** No

**Coordination with identified utilities has been initiated and/or completed** Yes

**Remarks:**

Overhead CEI lines along Literary will need to be adjusted for the trail structure. Along University the major CPP overhead lines along University should be largely avoided by the project, however, due to curb relocations along University and the reconfiguration of the W. 7<sup>th</sup> and W. 10<sup>th</sup> intersection various CPP and CEI distribution and service connection poles will need to be relocated. At various locations along University Avenue and at Literary Road there will be the potential need to relocate or locally adjust water, gas, or underground electric and telecomm to accommodate the drainage structures or drainage conduit. Level A test holes will be used to identify the vertical and horizontal location of utilities at key locations to determine if conflicts can be avoided through adjustment in drainage design.

On Carter Road overhead CEI power lines (service connections) and AT&T telecomm lines will need to be adjusted to new poles. A jointly owned CEI/AT&T duct may also need to be adjusted to tie into the new overhead facilities on the north side of Carter. Storm water facilities and fire hydrants will also need to be adjusted or moved to the final configuration.

Various power and telecomm facilities including poles and boxes will need to be relocated or adjusted between Carter Road and the proposed Columbus Road trail structure. Various castings and valves will need to be adjusted or reconstructed throughout the project. Adjustments and relocations are consistent with other



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urban projects of similar size and scope.

To accommodate construction of an off-road trail north of University Avenue between W. 6th Street and Literary, partial acquisition of one industrial property is required. In addition, partial right-of-way for 3 parcel owners is required along the University Avenue Corridor to accommodate the Towpath Trail and street reconfiguration. Driveway access will be taken away from one residence at University Avenue and W. 10th, due to the reconfiguration of University. At the Columbus Road/Canal Basin Park entry area, temporary and partial acquisition of one industrial property is necessary. Relocations and property acquisitions will follow the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

**Re-evaluation:**

Coordination will occur with Cleveland Public Power on any removal or relocation of power service utility poles in the project area. Utility coordination has occurred and had been performed also during the original project design. The contractor shall maintain proper clearance from all overhead and underground utilities and shall contact each utility for specific requirements.



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### Purpose & Need

#### Purpose & Need

#### Project History:

The Towpath Trail began 175 years ago as a simple but important dirt path where mules pulled boats full of passengers and goods along the Ohio & Erie Canal. Today, the Towpath has become an extraordinary regional asset as the spine of the 110-mile greenway known as the Ohio & Erie Canalway National Heritage Area. In Cleveland, the Towpath Trail is a recreational amenity that connects neighborhoods, employment centers, visitor destinations, natural areas and parks - while highlighting the industrial river valley. In addition, the Towpath Trail acts as the northern leg of the developing Ohio-to-Erie Trail, which extends from Cincinnati through Columbus into Cleveland.

The reinvention of the Towpath Trail began as a project completed by the National Park Service in the Cuyahoga Valley National Park (CVNP). The CVNP converted approximately 20 miles of the Towpath from a dirt path into a multi-use trail that brings visitors into close contact with nature and the remnants of the valley's history and culture. Today, the Towpath Trail in the CVNP receives more than 1.7 million users annually.

The success of this 20 mile segment of the Towpath Trail sparked a campaign to extend the trail through the 110 mile Ohio & Erie Canalway National Heritage Area (aka Ohio & Erie Canalway). Unique public/private partnerships have coalesced to construct individual segments of the expanding Towpath Trail system in Cuyahoga, Summit, Stark and Tuscarawas counties. In Cuyahoga County, Cleveland Metroparks completed two additional segments (totaling six mile of trail) of the Towpath Trail in its Ohio & Erie Canal Reservation, located immediately north of the CVNP. The northern terminus of the Towpath Trail is now at old Harvard Avenue which is where Phase 1 of the Towpath Trail Extension Project will begin.

In 1999, the Cuyahoga County Planning Commission (CCPC) published *Linking the Corridor: A Plan for the Towpath Trail in the North Cuyahoga Valley Corridor*. This document is a guide plan for the future design and construction of the approximately six-mile long trail extension from the Cleveland Metroparks' Ohio & Erie Canal Reservation at old Harvard Avenue to downtown Cleveland at the proposed Canal Basin Park, which will incorporate the original terminus of the Ohio & Erie canal with the Cuyahoga River. Phase 4 will be the northern part of the Towpath Trail.

Following the 1999 CCPC plan for the Towpath Trail, the Ohio & Erie Canal Association (OECA) released a management plan for the development of the entire Ohio & Erie Canalway. The Canalway Management Plan (CMP) envisioned a linear heritage greenway from Cleveland's lakefront south to Dover/New Philadelphia, Ohio. The CMP outlined a programmatic approach that would attract reinvestment in historic settings, conservation of the natural environment, expansion of recreational facilities and opportunities, and stimulation for new business and commercial developments. The Towpath Trail Extension is also included as part of the City of Cleveland's Master Bikeway plan.

In October 2004, nine agencies and organizations formed the Towpath Trail Partnership to initiate the planning and preliminary engineering studies for the Towpath Trail Extension Projects (Phases 1-4). The partnership included the Cuyahoga County Engineer (now the Department of Public Works), Cuyahoga County Planning Commission, City of Cleveland, Cleveland Metroparks, Northeast Ohio Areawide Coordinating Agency (NOACA), Ohio Canal Corridor, the Ohio Department of Transportation (ODOT), and the National Park Service (NPS)-CVNP.



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A formal Project Development Agreement was executed between Cuyahoga County, City of Cleveland, Cleveland Metroparks, and the Ohio Canal Corridor in May 2009 to establish the Towpath Trail Management Committee and to clarify roles and responsibilities to advance the project including:

- Cuyahoga County Department of Public Works is the lead agency for contracting and directing the design and construction of the project.
- City of Cleveland is the primary landowner for the project and responsible for future capital costs.
- Cleveland Metroparks has operational management responsibilities, including day-to-day maintenance, programming and security of the completed Towpath Trail.
- Ohio Canal Corridor is responsible for public outreach, funding strategies, right-of way acquisition support.

The Towpath Management Committee, which includes designated representatives from the four agencies that are part of the Towpath Trail Project Development Agreement, is the decision making body for the Project. The Towpath Partnership contains a larger group of staff from the four entities, ODOT, and the CVNP, and offers input on the conceptual design elements for the alternatives.

Currently, Phase 1 of the Towpath Trail Extension Project is in the planning/preliminary engineering stage, Phase 2 was constructed as part of the Steelyard Commons, and Phase 3 is currently in construction.

**Purpose Statement:**

The purpose of the Towpath Trail Extension (Phase 4) Project is to provide a multi-use trail that provides connectivity between Cleveland neighborhoods and over 100 miles of multi-use trails in the Ohio and Erie Canalway; to provide a safe recreational trail system that encourages outdoor recreation, maximizes green space; and to support local rejuvenation efforts.

**Need Element(s):**

In summary, the purpose of the Towpath Trail Extension (Phase 4) Project has four identified needs:

*Connectivity:*

Residents of the Cleveland neighborhoods and communities which line the east and west sides of the Cuyahoga River Valley do not have direct access to the extensive trail system that runs throughout the City of



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Cleveland and throughout the Cuyahoga River Valley. Cyclists, pedestrians, and rollerblade users currently have to either use old Harvard Avenue, a busy road used mostly by large trucks, or get in their cars and drive to a trailhead to access the Towpath Trail. Providing new connectivity is part of the *Canalway Management Plan's* goal of promoting community and economic development by unifying and strengthening connections between communities and neighborhoods.

*Safe Recreational Area and Green Space:*

With the development of residential properties in nearby Tremont, Cleveland's downtown area, and other adjacent neighborhoods and communities, access to additional green space becomes vitally important.

Residential communities in downtown areas want to be able to enjoy the same type of access to recreational activities and natural areas that are frequently provided in suburban communities. Greenways such as multi-use recreational trails encourage interaction among their users, provide opportunities to explore the outdoors, create re-vegetation efforts that decrease air pollution, and promote exercise. Development of a greenway associated with the Towpath Trail is also needed.

*Support Local Neighborhood Rejuvenation:*

Multi-modal access will introduce new visitors to the neighborhoods, which surround the trail in a way that meets the goals mentioned in the Canalway Management Plan. A new influx of people that might not have otherwise visited these distinct historical neighborhoods will provide prime opportunity for economic growth in these communities, repositioning Cleveland's core areas for settlement by a new potential group of city dwellers.

*Congressional Mandates:*

The Towpath Trail Extension Project has been identified in the SAFETEA-LU Transportation Bill as a Cuyahoga County Engineer's Office High Priority Project. The Towpath Trail Extension Project was programmed into 4 phases of construction. This document only covers the Phase 4 construction project. The Towpath Trail Extension Project has two congressional earmarks from the SAFETEA-LU , OH-214 and OH-322 as sponsored by U.S. Representative Dennis Kucinich and Senator George Voinovich respectively. OH-370, an additional 2006 Appropriation Earmark was secured for the Towpath Trail Extension Project as well.

**Goals and Objectives:**

Incorporating the plans from both the Ohio & Erie Canal Association (OECA) and the CCPC, and working closely with members of the local community, the Towpath Partnership recognized the need for additional recreational and green space opportunities for both local residents and visitors coming from outside the adjacent communities to be included in Phase 4.

There are several important community and regional goals and objectives for this project, including:

- Providing an economic stimulus to neighboring communities, through increased neighborhood connectivity, providing increased access to restaurants, shopping, and events in the surrounding neighborhoods.
- Providing additional access to green space, through the development of connector trails, particularly in the parts of Cleveland that are undergoing rapid residential development.



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- Integrating the Towpath Trail into Cleveland's citywide bicycle plan which will provide bicycle connectivity throughout the entire metropolitan area, strengthening the connection between communities.
- Protecting waterways, wetlands, and other natural resources and the creation of additional green space in the valley.
- Promoting sound environmental practices in project design and implementation.
- Communicating the story of the Canal and its industrial history to people throughout the Corridor through interpretive design.
- Incorporating those portions of the Phase 4 trail that have been constructed through a separately funded collaborative effort that involves members of the Towpath Trail Management Committee. These separate projects include portions of Phase 4 that were constructed as part of the Innerbelt Bridge Project and the Cuyahoga River Area of Concern (AOC) Urban Riparian Restoration Project Phase 1 & 2 (Scranton Peninsula). The Scranton Peninsula project was completed in 2014 and the Innerbelt Bridge Project was completed in 2016.

**Summary Statement:**

The Towpath Trail Extension (Phase 4), identified in the SAFETEA-LU Transportation Bill, is needed to link the local Tremont neighborhoods to the Towpath Trail and provide connectivity to over 100 miles of multi-use trails of the Ohio and Erie Canalway. The 1.7 million annual visitors that utilize the completed sections of Towpath Trail indicate the potential benefits of extending the Towpath Trail. By providing a safe trail connection, the Phase 4 Extension will be a catalyst for economic revitalization, and neighborhood connectivity. The Phase 4 Towpath Trail Extension will greatly benefit the entire city of Cleveland by enhancing residential development, attracting new businesses, and adding value to the neighboring communities.

**Logical Termini and Independent Utility:**

The logical termini for the Towpath Trail Extension (Phase 4) were established based on the scope of the identified needs in the various studies cited above. These termini include only the portion of the Towpath Trail Extension that will require construction based on the studies completed to date. The southern terminus of the project is Literary Avenue, where Phase 3 of the Towpath is currently being constructed. The northern terminus of the project is Canal Basin Park, which is in the planning stage. From this terminus at Center Street and Canal Road, trail users can access the existing sidewalk to Settlers Landing Park, Downtown Cleveland via Old River Road and the planned Canal Basin Park. These termini allow for the construction of Phase 4 of the Towpath Trail Extension, linking the local Downtown and Tremont neighborhoods with the Scranton Peninsula and to the Towpath Trail and the multi-use trails of the Ohio and Erie Canalway.



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The completion of Phase 4 of the Towpath Trail Extension will have a value independent of the completion of any other transportation project in the area. Phase 4 will link the local neighborhoods to the Towpath Trail and the multi-use trails of the Ohio and Erie Canalway. Regardless of other improvement projects, Phase 4 will provide a safe recreational area and green space, fulfill the congressional mandates of SAFETEA-LU, and support neighborhood rejuvenation.



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## Alternatives

### Alternatives

#### Discuss No Build Alternative:

The No-Build Alternative as defined for this project entails that Phase 4 of the Towpath Trail would not be built. For the No-Build Alternative, a trail would not be constructed and would not address the need of recreational connectivity and supporting a network of public access trails. This alternative does not address the four components of the project's Purpose and Need - to provide connectivity, safe recreational area and green space, support local neighborhood rejuvenation, and congressional mandates.

Was a Feasibility Study completed?

Yes

Date Feasibility Study was approved:

08/16/2017

Was an Alternative Evaluation Report (AER) completed?

No

#### Alternatives Considered

Name	Description	Reason Dismissed	Preferred Alternative
Zone 1 - Option 1B - Mixed Modes Bike Boulevard	This Alternative would split trail uses into separate locations. Bikes on roadway with vehicles, pedestrians on wider sidewalk	This alternative was dismissed for the following reasons: 1. Bicycles would be two-way while vehicles would be one-way down the hill. 2. This alternative does not provide consistent off-road experience for Towpath Trail 3. Potential conflicts between vehicular and bicycle traffic. 4. Pedestrians and bicyclists would be separated. 5. Challenging transition to and from off-road trail	No



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<p>Zone 1 - Option 1D - Dedicated with Bridge</p>	<p>This Alternative would reconfigure University to accommodate a shared use path with a bridge over Literary Avenue</p>		<p>Yes</p>
<p>Zone 1 - Option 1E - Low Road (Minimum Greenbelt)</p>	<p>This Alternative would locate the trail as off-road near the base of the existing bluff, between University/Railway and the existing asphalt plant operations.</p>	<p>This alternative was dismissed for the following reasons: 1. Impacts to the current asphalt plant and current operations. 2. Would require asphalt plant operator to remove large existing stockpile. 3. Potential slope stability concerns.</p>	<p>No</p>
<p>Zone 1 - Option 1H - Dedicated with at-grade crossing of Literary</p>	<p>This alternative would reconfigure University to accommodate a shared-use path.</p>	<p>This alternative was dismissed for the following reasons:          1. Impacts to the current asphalt plant operations.          2. Potential slope stability concerns.          3. Mid-block crossing of Literary Road. Potential trail-user conflict with vehicles on Literary.          4. Steep trail grade exceeds accessibility goals.</p>	<p>No</p>
<p>Zone 2 - Innerbelt Bridge Segment</p>	<p>This segment of the Towpath Trail and amenities was constructed by ODOT CCG1/CCG2 Projects through ODOT Right-of-way.</p>		<p>Yes</p>



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Zone 3 - Scranton Road Parking	This alternative includes the construction of trail lighting. Parking improvements were completed as part of the separate Scranton Road Improvement Project that was completed by the City of Cleveland.	This alternative was identified as the Preferred Alternative because the addition of trail lighting provides continuity with the overall Towpath Trail project, improving the trail users experience.	Yes
Zone 3 - Scranton Road No Build	The no-build alternative for the Scranton Road segment would consist of not adding lighting to this segment of the Towpath Trail	This alternative was dismissed because it does not enhance the trail-user experience. It does not provide continuity for the trail experience.	No
Zone 4 Option 4A - North/East side of Carter/Old River	This Alternative would locate the trail as a shared-use path on the north side of Carter Road and east side of Old River Road, crossing the Carter Road Lift Bridge		Yes
Zone 4 Option 4B - North/West side of Carter/Old River	This alternative would locate the trail as a shared-use path on the north side of Carter Road and west side of Old River Road, crossing the Carter Road Lift Bridge	This alternative was dismissed for the following reasons: 1. One crosswalk at Carter/Old River Road complicated by the free-flow right-turn from westbound Carter Road to northbound Carter Road.	No



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<p>Zone 5 - Option 5A - At-Grade Intersection</p>	<p>This alternative would locate the trail at street level using roadway treatments and/or crosswalks.</p>	<p>This alternative was dismissed for the following reasons: 1. Potential conflicts with existing infrastructure. 2. Requires a trail crosswalk at the dangerous Old River/Columbus/Canal Road intersection.</p>	<p>No</p>
<p>Zone 5 - Option 5B - Off-Road, West</p>	<p>This alternative allows the trail to descent in grade on the west side of Old River Road before crossing under Columbus Road and the RTA Tracks.</p>		<p>Yes</p>
<p>Zone 5 - Option 5C - Off-road, east (Behind B &amp; O Building)</p>	<p>This alternative allows the trail to descend in grade within the Sherwin Williams parking lot and under Old River Road, Columbus Road, and the RTA tracks.</p>	<p>This alternative was dismissed for the following reasons: 1. Impacts to Sherwin Williams property - reconfiguration of Columbus Road parking entrance, parking lot, and potential reduction in spaces. 2. Crosswalk through Sherwin Williams Columbus Road entrance drive for receiving dock. 3. Deemed less desirable than Alternative Option 5B by Sherwin Williams.</p>	<p>No</p>

**Discuss Reasons Alternative Identified as Preferred was selected:**

Towpath Trail Phase 4 Segment 1 is the portion of the trail that connects Phase 3 to the trail that was constructed for the Innerbelt. Segment 1 transports users from the trailhead between Phase 3 and Phase 4 and allows for a structure to cross over Literary Road without having to wait for traveling vehicles. The Preferred Alternative then uses the existing University Road as a corridor for the Towpath Trail, until it meets up with the Innerbelt Project component. In order to provide for a dedicated trail, local access roads will be redirected and University Road will be open to emergency and delivery vehicles. Zone 1 is located within Segment 1 of the Towpath Trail Phase 4.



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The Zone 1 - Option 1 D was identified as the Preferred Alternative for the following reasons:

1. It provides consistent off-road experience of the Towpath Trail
2. User conflicts with traffic minimized to connection points.
3. Diversion of traffic from University for through traffic was received positively by residents at 5/28/14 neighborhood meeting.
4. Coordination with City Traffic and City Service (Fire and Trash) have supported this alternative.
5. Lower trail profile at eastern end and use of fill material west of Literary Road addressed residence's concerns with viewshed from balconies.

Towpath Phase 4 Segment 2 takes users from the end of the Scranton AOC segment across the river through use of both on-and off-street paths to end in Canal Basin Park and consists of Zone 4 and Zone 5 for the alternatives evaluation. The Preferred Alternative places the trail on the north side of Carter Road, which allows for easy access to future development along the Cuyahoga River. The trail then crosses Old River Road and uses the existing lift bridge to cross the river on pavement. The trail then loops along Columbus Road to descend and cross under the Columbus Road structure and then the GCRTA Red Line structure to end at ground elevation in Canal Basin Park.

The Zone 4 - Option 4A was identified as the Preferred Alternative for the following reasons:

1. It utilizes the north side of Carter Road in close proximity to the Cuyahoga River.
2. It requires a trail crosswalk on Carter Road at the Old River/Columbus/Canal Road Intersection, which is consistent with driver expectations given existing pedestrian movements at an existing crosswalk.

The Zone 5 - Option 5B - Off Road, West was identified as the Preferred Alternative for the following reasons:

1. It provides minimal impacts to Sherwin Williams parking and Columbus Road entry.
2. Entry to Canal Basin Park is on the west side of Old River Road.
3. It provides continuous, consistent off-road experience of the Towpath Trail.

The Preferred Alternative provides for gradual inclines and descents for the trail users through the study area. When possible, the slope of the trail is maintained at slopes 5% and below. There are steeper slopes along the



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existing University Road which are not recommended to be altered. In its entirety, the Towpath Trail Phase 4 will be traverseable for all users, regardless of mode or level.



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**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 93.12** Yes

**Remarks:**

The proposed project is exempt under 40 CFR 93.126 as a bicycle and pedestrian facility.

**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 exempt under 40 CFR 93.126 as a bicycle and pedestrian facility.

**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:**

The proposed project is programmed on Northeast Ohio Areawide Coordination Agency's (NOACA) *SFY 2018-2021 Transportation Improvement Program*, pending approval.

**Environmental Commitments**

**Are there any environmental commitments? No**



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**Noise**

**Noise**

<b>Noise Sensitive Areas located within approximately 500' of the proposed project area</b>	Yes
<b>Noise Analysis conducted</b>	No
<b>The proposed project is a Type I project</b>	No
<b>The proposed project is a Type II project</b>	No

**Remarks:**

The proposed project is a multi-use trail within an urban area consisting of mixed residential units, and industrial businesses. This multi-use trail project does not add motor vehicle capacity, change vehicle mix, involve a roadway on new relocation, alter an existing roadway alignment, add travel lanes, or negatively affect the shielding of an existing roadway.

**Environmental Commitments**

**Are there any environmental commitments? No**



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**ESA**

**ESA**

**Does the project require any Permanent ROW or Easement?:** Yes

**ESA Screening Report was completed by District Staff** No

**Date of ESA Screening IOC from OES:** 09/22/2014

**Do any sites require a Phase 1 ESA, Phase 2 ESA, or plan note according to the IOC from OES?** Yes

Sites that require Phase 1 ESA, Phase 2 ESA, or Plan Note

Site Name	Address	Phase 1 Required?	Phase 2 Required?	Plan Note Required?
Site #2 - Emerald Dock LLC Property	University Road	Yes	Yes	Yes
Site #35, #36, #37, #39 - Sherwin Williams	826 Canal Road, 601 Canal Road, 597 Lime Street	Yes	Yes	Yes
Site #38 - City of Cleveland	Vacant Lot - 1198 West 10th Street	Yes	Yes	No
Site #40 - City of Cleveland	Vacant Lot - 1198 West 10th Street	Yes	No	No
Site #41 - City of Cleveland, B& O Property	B & O Railroad ROW - Abandoned	Yes	Yes	Yes

**Date of Phase 1 ESA IOC from OES:** 05/12/2015

**Date of Phase 2 ESA IOC from OES:** 10/02/2017

**Remarks:**

In a September 22, 2014 Environmental Site Assessment Screening IOC, Phase I ESA's were recommended for the Sherwins Williams Site, the Emerald Dock site, the City of Cleveland Site and the Prime Properties site. After additional coordination, it was determined in a November 21, 2014 IOC, that the City of Cleveland properties were not contiguous. Therefore two City of Cleveland parcels were recommended for Phase I ESAs (Sites 38 and 40). Based on the results of the Phase I ESA, 4 sites were recommended for Phase II ESA investigations.

Phase II investigations were completed in 2017 for the 4 sites. Regionally elevated levels of arsenic above Ohio EPA VAP residential levels were reported across all sites and high levels of PNAs (specifically benzo(a)anthracene, benzo(a)pyrene, and benzo(b)flouranthene) above the Ohio EPA VAP residential and commercial/industrial levels were also present at several of the sampling locations.

The intent of the Phase II ESA investigation was to identify the presence/absence of potential chemical contamination and preliminary evaluation of whether concentrations were sufficient to affect planned restoration and recreational land use; therefore, the vertical and horizontal extent of contamination has not been delineated. Based on these findings, the following specific recommendations were determined:



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**Site #2 - Emerald Dock LLC** - While levels of benzo(a)pyrene are above OEPA VAP residential land use, it is below the OEPA VAP ARS commercial/industrial land use level. Any materials excavated from this site may be reused on site. However, if the excavated materials can't be reused, they should be disposed of as a solid waste. A plan note should be placed in the plans to provide this direction. The current initial design indicates that most of this site will be covered by two to thirty feet of fill.

**Sites #35, #36, #37, and #39 - Sherwin Williams** - The presence of benzo(a)pyrene, benzo(a)anthracene, benzo(b)fluoranthene, dibenz(a,h)anthracene, arsenic, and lead are above Ohio EPA VAP ARS for commercial/industrial land use levels in the weather paint test area. A plan note should be placed in the plans directing that any excavated materials from this area be disposed of as a solid waste, without the option to reuse these materials.

The rest of the site shows levels above the OEPA VAP residential land use but below the OEPA VAP ARS for commercial/industrial land use levels. Any materials excavated from areas outside the weather test paint area may be reused on site. However, if these excavated materials can't be reused, they should be disposed of as a solid waste. A plan note should be placed in the plans to provide this direction.

**Site #38 - Vacant Lot - City of Cleveland** - None of the analytes were above Ohio EPA VAP ARS for residential use, therefore, no additional work was recommended for this site.

**Site #41 - Parking Lot - City of Cleveland** - The presence of benzo(a)pyrene is above the Ohio EPA VAP ARS for residential land use and arsenic is above background levels, however, these levels are below the VAP ARS for commercial/industrial land use. Materials excavated from this site may be reused onsite. However, if the excavated materials can't be reused, they should be disposed of as a solid waste. A plan note should be placed in the plans to provide this direction.

**Re-evaluation:**

There are no new areas included in this trailhead project. The Trailhead project area was covered in the original ESA investigation and there will be no impacts.

**According to the IOC from OES does the project require any Environmental Commitments (plans and/or other coordination)?** Yes



## Cultural Resources

### Cultural Properties Present

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

Cultural resource investigations were initiated with the April 4, 2014 Section 106 Request for Review (RFR) to ODOT-OES. As a result, on April 21, 2014, ODOT-OES initiated the Section 106 process with the Ohio State Historic Preservation Office (OSHP). ODOT-OES determined that the Area of Potential Effects (APE) contained

**Archaeology** - The APE features previous disturbance due to modern development; no further archaeological investigations are warranted.

**History/Archaeological Resources** - The APE contains:

- Tremont Historic District, listed in the National Register of Historic Places (NRHP)
- Ferry Cap and Screw, eligible for inclusion in the NRHP
- Lorain-Carnegie Bridge (SFN 1801503), listed in the NRHP
- Eagle Avenue Lift Bridge (SFN 8169604), eligible for inclusion in the NRHP
- Carter Road Lift Bridge (SFN 1869264), eligible for inclusion in the NRHP

On May 2, 2014, the OSHPO concurred in accordance with 36 CFR § 800.5(b) a finding of 'no adverse effect' is applicable to the undertaking.

As a result of preliminary engineering, project design was modified since the May 2, 2014 Section 106 determination of effect. Previously, no impacts to the Tremont Historic District were anticipated. Due to refined design, minor right-of-way will now be required from one contributing property (1023 University Avenue) and vehicular access to the garage of another contributing property (2002 W. 10th Street) will be lost. A section of the trail will cross over the NRHP eligible Carter Road Lift Bridge (SFN 869264). The



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bridge deck will be modified to accommodate the trail. An environmental commitment will be put in place to provide the SHPO and other consulting parties an opportunity to review the proposed deck modifications prior to construction.

On November 25, 2014, ODOT OES re-coordinated the project with the OSHPO. In accordance with 36 CFR Section 800.5(b), FHWA with ODOT as their agent determined a finding of 'no adverse effect' is applicable to the modified undertaking. On January 5, 2015, the OSHPO responded that for the most part, they concur with FHWA's/ODOT's finding that the proposed Towpath Trail Extension- Phase 4 will not affect the historic properties in its vicinity. The only exception is the effect on the residence at 2002 W. 10<sup>th</sup> Street, which appears to be adverse because it will alter the ability for the building to continue its historic function as a residence with an attached garage. By closing University Avenue to automobile traffic, the owners of this house will no longer be able to park their cars in the garage, and it might make it difficult to sell a house that has a garage but no vehicular access to it.

As a result, additional public involvement efforts have taken place. These activities included a February 2015 coordination meeting with the Cleveland Landmarks Commission which identified the NRHP listed Cleveland Centre Historic District within the project limits, coordination with Charles Moll, owner of the residence at 2002 W. 10<sup>th</sup> Street, and Consulting Parties invitation letter was sent out on March 19, 2015 with four responses were received asking to be a Consulting Party; Rich Toeh (resident), Flats Forward, Downtown Cleveland Alliance, and Tremont West CDC.

On November 9, 2015, ODOT-OES re-coordinated the project with OSHPO. In accordance with 36 CFR Section 800.5(b), FHWA with ODOT as their agent determined that a finding of 'no adverse effect' is applicable to the subject undertaking. The SHPO will be provided an opportunity to review subsequent plans and concur that they are consistent with the Secretary's Standards for Treatment of Historic Properties (36 CFR part 68) and applicable guidelines. Plans will include the incorporation of a Tremont Historic District sign. SHPO concurred with this finding on November 19, 2015.

**Re-evaluation:**

There are no new areas included in this trailhead project. The Trailhead project area was covered in the original Section 106 Review and there will be no impacts.

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

**OES Approval/OSHPO Concurrence Date:** 11/19/2015

**Remarks:**

As part of the Towpath Phase 4 project, ODOT reviewed the Section 106 Request for Review and coordinated the project with the Ohio Historic Preservation Office (OHPO) on April 21, 2014. In accordance with 36 CFR 800.5(b), FHWA, with ODOT as their agent, determined a finding of '*no adverse effect*' was applicable to the undertaking. On May 2, 2014, OHPO concurred with this determination.

Upon additional preliminary engineering, it was determined that the project would require for work to take place outside of the existing right-of-way. An updated Section 106 Request for Review was submitted to ODOT on September 12, 2014. Due to changes in the project scope, a field review was conducted with staff members of the ODOT District 12 office, the ODOT-Office of Environmental Services (ODOT-OES), and the



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SHPO on November 12, 2014.

Subsequently, ODOT-OES submitted a second submission, dated November 25, 2014, to the the SHPO requesting concurrence that a finding of 'no adverse effect' was still applicable to the undertaking. On January 5, 2015, the SHPO formally responded to the November 25, 2014 submission. In summary, the SHPO concluded:

...For the most part, I concur with your finding that the proposed Towpath Trail Extension - Phase 4 will not affect the historic properties in the vicinity. The only exception is the effect on the residence at 2002 W. 10th Street, which appears to be adverse because it will alter the ability for the building to continue its historic function as a residence with an attached garage. By closing University Avenue to automobile traffic, the owners of the house will no longer be able to park their cars in the garage, and it might make it difficult to sell a house that has a garage but no vehicular access to it...

Based on SHPO comments dated January 5, 2015 and subsequent consultation, ODOT has committed to ensuring a Tremont Historic District sign will be incorporated into project design to minimize effects on the Tremont Historic District of which the residences at 2002 W. 10th Street is a contributing element. Effects to the recently listed Cleveland Centre Historic District were also considered.

ODOT-OES submitted an additional coordination letter to the SHPO on November 9, 2015. In this correspondence, FHWA, with ODOT as their agent, determined that a finding of 'no adverse effect' is applicable to the subject undertaking in accordance with 36 CFR 800.5(b). The SHPO will be provided an opportunity to review subsequent plans and concur that they are consistent with the Secretary's Standards for Treatment of Historic Properties (36 CFR part 68) and applicable guidelines. Plans will include the incorporation of a Tremont Historic District sign. Concurrence with the finding of *conditional 'no adverse effect'* was received on November 19, 2015.

The multiple coordination letters between ODOT-OES and SHPO can be found in the Project File/Cultural Resources/Coordination.

Re-evaluation:

There are no new areas included in this trailhead project.

**Please check all NRHP Eligible and/or Listed resources:**

Historic District

Bridge

**What is the Section 106 effect determination in the OES Transmittal**

No Adverse Effect

**Archaeological Resource Adverse Effect**



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**History/Architecture Adverse Effect**

**Tribal Consultation**

Since no Tribe was interested in this project based on their customized preferences, no further Tribal consultation was conducted

**Environmental Commitments**

**Are there any Environmental Commitments? Yes**



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### **Ecological**

Based on a consideration and ecological review, the project does not have the potential to impact ecological resources regulated under the under Sections 404 or 401 of the Clean Water Act, Section 7 of the Endangered Species Act, or the Fish and Wildlife Coordination Act, and should not result in any activities that violate ORC Chapters 1518 and 1531, or Section 1533.324. This project is considered Ecologically Exempt under the Ecological MOA (Agreement 19394).



### 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.

**Remarks:**

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.

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:**

No drinking water resources are located within the proposed project area based on a June 8, 2017 review of ODNR's Water Wells GIS website and a review of the OEPA drinking water resource maps. Furthermore, the proposed project is not located within a drinking water source protection area or located within a sole-source aquifer.

Are there any environmental commitments? No



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**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

OWJs

Name	Date concurrence received
City of Cleveland	07/14/17
State Historic Preservation Office	11/19/2015

	Present:	Impacted:
Publicly owned Park(s):	Yes	No
Publicly owned recreation facility(ies) and/or area(s):	No	
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
Tremont Historic District	Historic Site	0.0	0	De Minimis	11/19/2015
Cleveland Centre Historic District	Historic Site	0.50	0.4	De Minimis	11/19/15
Canal Basin Park	Publicly owned Park	0	0	No Use	08/17/2017

**Remarks:**

Based on SHPO concurrence dated November 19, 2015, the following Section 4(f) *de minimis* findings have been applied to the project:

Tremont Historic District



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The undertaking will convert University Avenue, between W. 10th Street and W. 11th Place, into a pedestrian facility within the Tremont Historic District. The property at 2002 W. 10th will lose vehicular access to the garage which fronts University Avenue. Although the property will lose vehicular access to the garage, it will gain the use of an 11' wide 'landscaped buffer' contiguous with the parcel. On-street parking will be provided on W. 10th Street. Measures to minimize effects to the property located at 2002 W. 10th Street and the Tremont Historic District include the incorporation of a Tremont Historic District sign, the addition of greenspace adjacent to the property and supplemental parking into the project scope. In addition, the project sponsor will continue to consult with the property owner, consulting parties, and the public to ensure the effects upon the historic properties are minimized throughout the project development process.

New right-of-way will be required from 1023 University Avenue, a contributing feature of the Tremont Historic District. The area of new right-of-way will be from the northeast corner of the parcel. Although the parcel will lose right-of-way, the property will gain the use of the 22' wide 'patio space' to be contiguous with the existing parcel. The Towpath Trail will be located between west-bound University Avenue and the tree-lined 'buffer.' 1023 University Avenue will maintain vehicular access of W. 11th Place. Measures to minimize effects to the property located at 1023 University Avenue and the Tremont Historic District include the incorporation of a Tremont Historic District sign and the addition of green space adjacent to the property. No contributing features of the property located at 1023 University Avenue will be compromised.

2021 W. 11th Street is approximately 0.24 acres and consists of a single-family house located in the Tremont Historic District. The 2-story, concrete house (ca. 2011) was constructed after the NRHP nomination was completed and is not identified in the nomination. No contributing features of the Tremont Historic District will be removed or altered.

**Tremont Historic District - Intent to Make a Section 4(f) *De Minimis* Finding** - New right-of-way will be acquired from within the Tremont Historic District at 1023 University Avenue and 2021 W. 11th Street. FHWA with ODOT as their agent is notifying the SHPO of the intent to apply a Section 4(f) *de minimis* finding upon SHPO concurrence a finding of 'no adverse effect' is applicable to the effect of the undertaking upon the Tremont Historic District.

#### Cleveland Center Historic District

A section of the trail will be located within the Cleveland Centre Historic District which was listed on the NHRP on November 25, 2013. The district is eligible for the NRHP under Criteria A and C. Two parcels associated with the Sherwin-Williams Company will be impacted by the proposed trail (Parcel #10120003 and Parcel 1012012). The Sherwin-Williams Company is a contributing feature within the Cleveland Centre Historic District. The subject parcels feature an asphalt employee parking lot, a paint sample area, former railroad right-of-way, and maintained grass area. The project will require approximately 0.50 acres. No contributing features of the associated Sherwin-Williams Company or of the Cleveland Centre Historic District will be altered. In summary the introduction of the trail within the Cleveland Centre Historic District and the acquisition of 0.50 acres of permanent right-of-way from a non-contributing area of the district will not adversely affect its historic integrity.

**Cleveland Centre Historic District - Intent to Make a Section 4(f) *De minimis* Finding** - New right-of-way will be acquired from within the Cleveland Centre Historic District. FHWA with ODOT as their agent is notifying SHPO of the intent to apply a Section 4(f) *de minimis* finding upon SHPO concurrence a finding of 'no adverse effect' is applicable to the effect of the undertaking on the Cleveland Historic District.



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The planned Canal Basin Park is a recognized Section 4(f) property in accordance with 23 CFR 774. The Canal Basin Park Framework Plan was developed with parameters that included the current alignment of the Towpath Trail. No direct or indirect use of the proposed Canal Basin Park will occur. The City of Cleveland will own both the Towpath Trail and the Canal Basin Park. The Cleveland Metroparks will be responsible for the management/maintenance of both. The official with Jurisdiction over the park is the City of Cleveland.

On July 14, 2017, the City of Cleveland Acting Director of Public Works concurred that the project does not constitute a 'use' of the 4(f) property. On August 17, 2017, ODOT-OES made a Section 4(f) Determination of No Use for the Canal Basin Park.

Re-evaluation:

There are no new areas included in this trailhead project.

**Are there any environmental commitments? Yes**



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**Section 6(f)**

**Section 6(f) Determination**

	<b>Present:</b>	<b>Impacted:</b>
6(f) Properties:	No	

**Remarks:**

A June 8, 2017 review of the detailed listing of United States Department of Interior, National Park Service's on-line Land & Water Conservation Fund Grants (<http://waso-lwcf.ncrc.nps.gov/public/index.cfm>) did not identify any recipients within the project area.

**Are there any environmental commitments? No**



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## Community Impacts

### Community Impacts

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

**Remarks:**

The proposed project is identified in the City of Cleveland's *Bikeway Master Plan*, the *Cleveland Metroparks 2020: The Emerald Necklace Centennial Plan*, and the Ohio and Erie Canal Association's *Ohio and Erie Canalway Management Plan* and the Cuyahoga County Planning Commission published *Linking the Corridor: A Plan for the Towpath Trail in the North Cuyahoga Valley Corridor*.

A formal Project Development Agreement has been executed between local stakeholders to advance the project, including:

- *Cuyahoga County Department of Public Works* - Lead agency for contracting and directing the design and construction of the project.
- *City of Cleveland* - Capital responsibilities, primary land owner for the project and responsibilities for future capital costs.
- *Cleveland Metroparks* - Operational management responsibilities, including day-to-day operations and maintenance of the completed Towpath Trail and green space.
- *Ohio Canal Corridor* - Public outreach, funding strategies, right-of-way acquisition support.

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

**Remarks:**

The Towpath Trail will promote connection and cohesion among the neighborhoods and communities in which it is located. The trail will provide for a pedestrian and bicycle only connection to the adjacent neighborhoods. The Towpath Trail will advocate trail, roadway and greenway linkages between the Towpath Trail/Canal Corridor and adjacent neighborhoods and park systems.

The trail will allow the residents of the Cleveland neighborhoods and communities which line the east and west sides of the Cuyahoga River Valley to have direct trail access to the extensive trail system that runs throughout the Cuyahoga River Valley. Cyclists, pedestrians, and rollerblade users currently have to either use old Harvard Avenue, a busy road used mostly by large trucks, or get in their cars and drive to a trailhead to access the Towpath Trail.

Connections to the Lakefront Bikeway, Emerald Necklace, Big Creek Trail, West Creek Trail, Mill Creek Trail, Train Avenue Trail, Treadway Ravine and the City Loop Trail are needed to form a contiguous trail network. This existing planned off-road trail network will also connect into Cleveland's citywide bicycle plan with its dedicated street routes that will interface with the trail network. These connections will provide uninterrupted bikeway access from neighborhoods and communities in the vicinity of the Towpath Trail to more than 100 miles of trails through the federally designated Ohio & Erie Canalway, and will serve as the northeast Ohio section of the State of Ohio's developing Ohio-to-Erie Trail, linking Cincinnati, Columbus, and Cleveland.



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

**Remarks:**

The proposed project is identified in the City of Cleveland's *Bikeway Master Plan*, the *Cleveland Metroparks 2020: the Emerald Necklase Centennial Plan* and the Ohio and Erie Canal Association's *Ohio & Erie Canalway Management Plan* and the Cuyahoga County Planning Commission published *Linking the Corridor: A Plan for the Towpath Trail in the North Cuyahoga Valley Corridor*. The proposed project has been integrated with the City of Cleveland's planned Canal Basin Park. As the proposed project is identified in long-term development plans and accounted for by the local development community development agencies, indirect and cumulative impacts as a result of the proposed project are not anticipated.

**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:**

The proposed project will be a benefit to the pedestrian and bicycle facilities within the City of Cleveland. The proposed project will complete the Phase 4 of the Towpath Trail and a section of the statewide Ohio to Erie Trail. This trail will also tie into the City of Cleveland's Citywide Bicycle Plan.

**Will the proposed action displace residents, businesses, institutions or farms?** Yes

Number of Displacements

**Residences:** 1

**Businesses:** 0

**Institutions:** 0

**Farms:** 0

**Remarks:**

To accommodate construction of an off-road trail north of University Avenue between W. 6th Street and Literary Avenue, partial acquisition of one industrial property is required.

Along the University Avenue Corridor, partial right-of-way is required for 3 parcel owners to accommodate the Towpath Trail and street reconfiguration. Driveway access will be taken from one residence at University Avenue and W. 10th, due to the reconfiguration of University into a dedicated shared-use path without public vehicular access. An offer to purchase the entire property will be made if the offer to remove driveway access is not acceptable to the owner.

At the Columbus Road/Canal Basin Park entry area, temporary and partial acquisition of an industrial parcel is proposed to construct the Towpath Trail entry to cross under Columbus Road into the future home of the Canal Basin Park. The temporary acquisition will allow for the project to relocate an existing access drive for the industrial property.



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Relocations and property acquisitions will follow the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, (Uniform Relocation Act) (P.L. 91-646).

**Are there any Environmental Commitments? No**



## Underserved Populations

### Underserved Populations

#### Identified Underserved Populations

Census Block Group #	% Minority	% Low Income
390351042001	70	61
390351077011	37	41

- Are Underserved Populations located within and/or adjacent to the proposed project area? Yes
- Are there any relocations? Yes
- Are there residential relocation(s)? Yes
- Is Housing of Last Resort anticipated? No
- Are there business relocations? No
- Will there be changes to access? Yes
- Will access to shopping, bus stops, schools, jobs, recreational resources, community centers, etc. be diminished or completely restricted on a permanent basis for an Underserved Population? No
- Will man-made dividers such as an overpass, bridge, 4-lane or greater roadway or railroad negatively impact the extent to which a community feels connected or cohesive for an Underserved Population? No
- Will access to or use of the transportation improvement be denied to any Underserved Populations (for reasons such as cost to use, ability to access, etc.)? No
- Will the proposed project result in unanticipated additional impacts to any Underserved Populations?
- 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
- Were any concerns related to impacts on Title VI Populations or any other unique factors that could result in a disparate impact raised during Public Involvement?
- Were any concerns or any other unique factors that could result in an impact to any of the Underserved Populations (Limited English Proficiency, Older Adults, or Individuals with Disabilities) raised during Public Involvement? No

#### Remarks:

Along the University Avenue Corridor, partial right-of-way is required for 3 parcel owners to accommodate the Towpath Trail and street reconfiguration. Driveway access will be taken from one residence at University Avenue and W. 10th, due to the reconfiguration of University into a



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dedicated shared-use path without public vehicular access. An offer to purchase the entire property will be made if the offer to remove driveway access is not acceptable to the owner.

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

**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)**

The public involvement efforts for the Towpath Trail Extension - Phase 4 (PID 87075) project were designed to build upon the previous public involvement efforts for the Towpath Trail Extension - Phase 3 (PID 84112) and the Scranton Road Peninsula AOC project, and the current on-going public involvement efforts for the Towpath Trail - Phase 1 (PID 80997) project. The overall intent of public involvement during the development of this project is to distribute project information and solicit public input on the project elements (Purpose and Need; Alternatives Assessment; Impacts, etc.).

The Towpath Trail - Phase 4 Project's public involvement process addresses these important objectives using several methods to achieve these goals, including Partnership Committee meetings, Community Development Corporation (CDC) meetings, block-club meetings, individual stakeholder meetings, and public meetings.

Given the potential for impacts on the Tremont Neighborhoods and industrial area of the Flats, the Management Committee felt the public involvement process should include a robust outreach effort to engage a variety of residential, commercial, and industrial stakeholders using the Tremont West CDC and the Flats Forward CDC as key points of contact. These CDCs could then assist in identifying and reaching out to key neighborhood block clubs, individual residents, and industrial entities to discuss and solicit feedback concerning project alternatives, identifying potential conflicts, and assisting to develop appropriate resolutions.

One primary forum for public input for this project was the Working Group and Partnership Committee meetings held throughout the project process. The Working Group is comprised of technical staff of the four-party Management Committee. The Partnership Committee has been continuously involved since 2008 in each phase of the overall Towpath Trail project to provide feedback. The Partnership Committee includes public officials, public agencies, and representatives from various entities and area businesses.

For the Towpath Trail-Phase 4 project, Management Committee/Working Group meetings and Partnership Committee meetings were held on February 2, April 16, May 14, June 11, July 8, July 18, August 11, September 19, and December 10, 2014. Additional meetings were held on April 1 and May 27, 2015, November 7 and December 5, 2016 and January 10, February 7, March 7, April 26, and May 24, 2017.

During these meetings, project alternatives were discussed including the placement of the trail alignment along and on University Boulevard. The closure of portions of University Boulevard and the reconfiguration of neighborhood accessibility were discussed along with the placement of the trail within the existing right-of-way (ROW) of Carter Road and the Carter Road Lift Bridge. The Partnership Committee meetings and Management Committee/Working Group were aware that the trail was located within the National Register of Historic Places (NRHP) listed Tremont Historic District, the NRHP listed Cleveland Centre Historic District, and The NRHP eligible Carter Road Lift Bridge. No concerns regarding adverse impacts were raised by the Partnership Committee or the Management Committee as the result of this project.



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Individual meetings with key stakeholders were held to inform them of the project's status and to directly solicit information regarding the areas of concern that they represent. Meetings were held at various stages throughout the project development from 2014 through 2017. Key stakeholders included Alex Brothers/Emerald Docks, Cleveland Fire, Cleveland Landmarks Commission, Cleveland Traffic, Councilman Cimperman, Cleveland Division of Waste, Flats Forward, Forest City, Historic Gateway District, Land Studio, Sherwin Williams, Sokolowski's, and the Advisory Committee on Persons with Disabilities. Concerns raised during these meetings included roadway patterns, commercial and residential neighborhood access and property access, separation of trucks and trail users, lighting, emergency services, trash pickup, snow removal, aesthetic treatments, and sightlines. No concerns regarding EJ populations or adverse impacts to the NRHP listed Tremont Historic District, the NRHP listed Cleveland Centre Historic District and the NRHP eligible Carter Road Lift Bridge were raised.

Community Development Corporations and Neighborhood Block Club Meetings were also held to solicit community input. This effort was designed to engage the local community early in the project development process, to solicit feedback on trail concepts and to identify neighborhood concerns and potential impacts to the neighborhood. Meetings included the Tremont West Development Corporation, Tremont Core Residential Group, Tremont Residential meeting, North Literary Block Club, Central Tremont Block Club, Charles Moll, and North of Literary Block Club. These meetings were held at various times from 2014 through 2017.

**Re-evaluation:**

The proposed Trailhead project was presented to the Towpath Trail partner organizations of the City of Cleveland, Canalway Partners, and Cleveland Metroparks hosted two virtual stakeholder meetings on November 16, 2020 (10am and 4pm) and to the public by a virtual public meeting on November 17, 2020 at 6pm. All were held on the Zoom platform and the public meeting was also broadcast via facebook live.

The meeting presentation was collaboratively developed by the partner organizations and included an update of the Congestion Mitigation and Air Quality (CMAQ) program funded portions of the Canal Basin Park including the timeline and details on what will be included in this phase of development as well as an overview and background of plans for the larger, overall Canal Basin Park and ancillary projects. Included was a brief history of planning efforts to develop the subject improvements and a delineation of the portion of Stage 4 of the Towpath Trail that is within Canal Basin Park footprint.

**Was Public Involvement conducted in compliance with Title VI requirements?** Yes

**Is there any substantial environmental controversy on environmental grounds?** No

**Please summarize the Public Involvement responses received.**

A Towpath Trail - Phase 4 public meeting was held on November 6, 2014 within the project area at the Annunciation Greek Orthodox Church from 5:00 pm to 7:00 pm in the Open House Format. The meeting was attended by approximately 100 attendees representing stakeholders, residents, and businesses. Letter responses were sent to the 11 written comments that were received concerning Phase 4. Comments were generally supportive of the project and asked for clarification concerning roadway operations, utility relocations, aesthetics, safety, trail maintenance, safety lighting, traffic circulation, alley access, neighborhood trail connectors/loops, and viewsheds/sightlines from the



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Tremont neighborhood. No concerns regarding EJ populations or adverse impacts to the NRHP listed Tremont District, the NRHP listed Cleveland Centre Historic District, and the NRHP eligible Carter Road Lift Bridge were raised.

The revised concepts for the Towpath Trail along University Avenue, including the proposed removal of the connector alley, were delivered to adjacent residents and emailed to the Tremont North of Literary Block Club. On April 18, 2017, the project team presented to the North of Literary Block Club the updated Towpath Trail plans for the University Road segment and took feedback.

Comments were generally supportive of the project and asked for clarification concerning schedule, park/play areas, roadway operations, traffic circulation and access. Several residents expressed concern for loss of vehicular access to the front of their properties between W. 11th Place and W. 10th Street. No comments were received on the removal of the connector alley between W. 11th Street and W. 11th Place.

Responses to the public comments can be found in the Project File/Public Involvement/Project Information/Response to Comments.pdf and Public Involvement Summary.PDF.

Re-evaluation:

**Public Comments Received:**

The virtual public meeting held on November 17, 2020 was well attended. While the virtual format is not the ideal way to gather feedback, there was the opportunity through the chats and 'raising hand' function to ask questions. Questions were extremely limited and dealt mainly with future programming or development at the park outside of the subject CMAQ-funded piece. Project partners confirmed that they received no follow-on emails or inquiries as a result of the meeting, from materials posted on Canalway Partners' website, or as a result of the media coverage of the meeting.

**Responses to Public Comments Received:**

One attendee asked if there would be lighting at the park. Answer: yes.

Another asked about whether there would be amenities like benches and water fountains. Answer: yes, with more to come in other sections of the park as development of future phases continues.

**Conclusion Statement:**

Comments received about the amenities and lighting directly influenced the order of inclusion of these items in the project budget. Lighting will be pedestrian-scaled and is planned to be included in the base bid for the project. Additionally, items like the water fountain were elevated in their importance to be included in the project vs. in future phases. The Cleveland Metroparks has decided to proceed with the project as currently designed.

**Are there any Environmental Commitments? No**



## Permits

### Waterway Permits

Are Waterway Permits required? No

ODNR

Shore Structure Permit : No

#### Remarks:

No waterway permits are anticipated for the project.

Are there any environmental commitments? No

### Storm Water Permits

NPDES Construction General Permit for Stormwater (NOI): Yes

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

#### Remarks:

The proposed project will disturb greater than 1 acre of total earth. The construction contractor will be responsible for modifying the project site plan to prepare a Stormwater Pollution Prevention Plan (SWPPP) that meets the Ohio EPA NPDES (National Pollutant Discharge Elimination System) Permit requirements. The final design plans will include a SWPPP in accordance with the City of Cleveland and Cuyahoga County Soil and Water Conservation District SWPPP Specifications.

Are there any environmental commitments? Yes

### Floodplains

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

#### Remarks:

Based on a review of available floodplain mapping, the proposed project area is not located within a FEMA flood zone. No construction activities will be located within a flood zone or the 100 year floodplain. Therefore, coordination with the local Floodplain Administrator is not required.

Are there any environmental commitments? No

### Landfills



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**Is a 2713 Permit required?**

No

**Remarks:**

Based on a field review and review of available secondary source information, no landfills were identified within the proposed project area.

**Are there any environmental commitments? No**



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## **Environmental Commitments**

### **General Project Information**

1) The project designer shall incorporate the following note into the plans: Coordination with emergency services and schools for any necessary short term closures within the project area will occur during final design and construction.

### **ESA**

1) The Project Designer shall incorporate the following note into the plans: A solid waste plan note shall be placed in the plans indicating that any materials excavated from Site #41 may be reused on site since they are below VAP Commercial/Industrial levels. However, if the excavated materials can't be reused, they should be disposed of as a solid waste since they are above VAP Residential levels.

2) The Project Designer shall incorporate the following note into the plans: A solid waste plan note shall be included in the design documents indicating that any excavated materials from the weather paint test area of Sites #35, #36, #37, and #39 should be disposed of as a solid waste without the option to reuse since these materials are above the VAP Commercial/Industrial levels.

3) The Project Designer shall incorporate the following note into the plans: A solid waste plan note shall be placed in the plans indicating that any materials excavated from Site #2 may be reused on site since they are below VAP Commercial/Industrial levels. However, if the excavated materials can't be reused, they should be disposed of as a solid waste since they are above VAP residential levels.

4) The Project Designer shall incorporate the following note into the plans: Any materials excavated from outside the weather test paint area of Sites #35, #36, #37, and #39 may be reused onsite since they are below VAP Commercial/Industrial levels. However, if these excavated materials can't be reused, they should be disposed of as a solid waste since they are above VAP Residential levels.

### **Cultural Resources**

1) The Project Designer shall incorporate a Tremont Historic District sign within the historic district boundary into the plans.

2) Once the Stage 3 design plans are available, the District Environmental Coordinator will provide to the plans to ODOT OES for coordination with the State Historic Preservation Office prior to the commencement of construction for a 30 day review period.

### **Ecological**

1) The Project Designer shall incorporate the following note into the plans: The project is located within the known habitat ranges of the federally listed and protected Indiana bat and northern long-eared bat. 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 these species as required by the Endangered Species Act. For the purposes 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.

### **Section 4(f)**

1) The Project Designer shall incorporate the following note into the plans: The contractor will provide appropriate signage to alert users of construction activities, if in proximity to recreational facilities or features.



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- 2) The Project Designer shall incorporate the following note into the plans: Except as necessary to facilitate construction activities, the staging and/or storage of construction equipment by the Contractor will not take place outside the proposed construction limits, within Canal Basin Park.
- 3) The Project Designer shall incorporate a Tremont Historic District sign and the addition of green space adjacent to the property as measures to minimize the effects to the property located at 1023 University Avenue and the Tremont Historic District.
- 4) The project designer shall incorporate the following note into the plans: The contractor must maintain access to Canal Basin Park at all times during construction activities
- 5) The Project Designer shall incorporate the following note into the plans: To protect the Canal Basin Park and the public, the Contractor shall install temporary construction fencing within the project construction limits along the Canal Basin Park boundary prior to the start of construction activities.
- 6) The Project Designer shall incorporate a Tremont Historic District Sign, the addition of greenspace adjacent to the property, and parking in the project plans as measures to minimize effects to the property located at 2002 W. 10th Street and the Tremont Historic District.
- 7) The Project Designer shall incorporate the following note into the plans: The Contractor will be required to closely coordinate the construction schedule with Cuyahoga County Department of Public Works, City of Cleveland, and Cleveland Metroparks.

**Permits - Storm Water Permits**

- 1) The Project Designer shall incorporate the following note into the plans: The construction contractor will be responsible for modifying the project site plan to prepare a Stormwater Pollution Prevention Plan (SWPPP) that meets the Ohio EPA NPDES (National Pollutant Discharge Elimination System) Permit requirements. The final design plans will include a SWPPP in accordance with the City of Cleveland and Cuyahoga County Soil and Water Conservation District SWPPP Specifications.

**Permits - Landfills**

- 1) \*



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Approved & Electronically Signed By:	Approval Date:
Mark Carpenter (TRANS ENGR 3)	3/10/2021



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## **Appendix**

### **ESA**

OES Recommendations - Phase I.pdf

OES Recommendations - Phase II.pdf

OES Recommendations - Screening.pdf

Update OES Recommendations - Screening.pdf

### **Cultural Resources**

Consulting Party Comment Response.pdf

Consulting Party Request Acknowledgement.pdf

Coordination with SHPO - No Adverse Effect.pdf

Coordination with SHPO-No Adverse Effect.pdf

OES Response to Agency Comments - Cultural.pdf

Records Check.pdf

SHPO Concurrence - No Adverse Effect.pdf

SHPO Coordination - Attachments.pdf

SHPO Coordination\_Plans .pdf

SHPO Coordination\_Plans.Figures.pdf

SHPO response to 11-25-15 Coord Letter.pdf

Updated SHPO Approval No Adv Effect.pdf

### **Ecological**

Coordination with ODNR.pdf

Coordination with USFWS.pdf

ODNR Comments.pdf

ODNR Scenic River MOA Conditions

USFWS Comments.pdf

### **Section 4(f) 6(f)**

Coordination with FHWA - Section 106.pdf

FHWA Coordination to apply de minimus.pdf

FHWA de minimis Non-Objection.pdf

OES Section 106 Determination.pdf



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**Section 4(f)**

No Use Determination Form - Appendices.pdf

No Use Determination Form.pdf

OES Recreational 4(f) Determination.pdf

**Environmental Justice**

Census Mapping.pdf

**Public Involvement**

News Article.pdf

PI Summary.pdf

Property Owner Notification Letter.pdf

Public Hearing Sign In Sheet.pdf

Public Involvement Newsletter.pdf

Public Involvement Summary 2021 Update.pdf

Public Involvement Summary.pdf

Public Meeting Notification.pdf

Public Meeting Presentation.pdf

Public Meeting Sign In Sheet.pdf

Response to Public Comments.pdf

Stakeholder Contact List.pdf

Stakeholder Notification.pdf