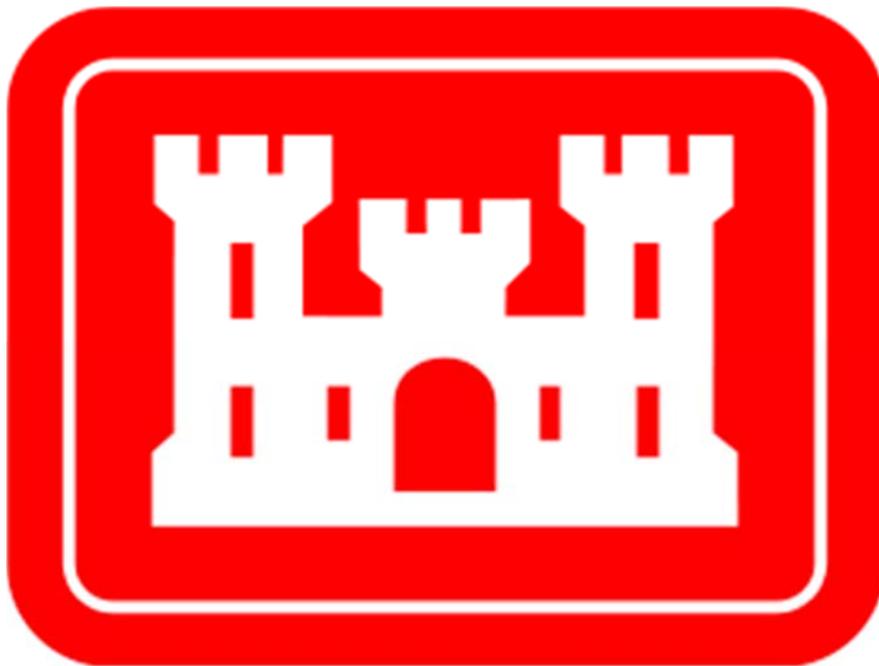


Draft Environmental Assessment
Section 408
West Columbus
Interstate Route 71 Road Widening Project
Franklin County, Ohio



U.S. Army Corps of Engineers
Huntington District
Huntington, West Virginia
March 2017



Executive Summary

The Ohio Department of Transportation (ODOT) is proposing to rehabilitate Interstate Route (IR) 71 from north of the Stringtown Road Interchange to State Route 315 in Columbus, Franklin County, Ohio. This Environmental Assessment (EA) examines the potential environmental impacts of the West Columbus Interstate Route (IR) 71 road widening project located in Franklin County, Ohio and the projects effects on the West Columbus Local Protection Project.

The Proposed Action Alternative would involve pavement rehabilitation and the addition of one lane in each direction. This alternative will provide lane continuity between the improvements from two ODOT contracts. This alternative was selected as the proposed action alternative based upon its ability to meet the purpose and need elements by providing suitable pavement, maintain adequate Level of Service, and increase safety in the corridor for projected traffic volumes without significant cost difference over the other alternative. The proposed project will impact eight locations of the West Columbus Local Protection Project (LPP).

The proposed project will potentially effect the Corps West Columbus Local Protection Project. Section 14 of the Rivers and Harbors Act of 1899 and codified in 33 USC 408 (Section 408) authorizes the Secretary of the Army, on the recommendation of the Chief of Engineers of the U.S. Army Corps of Engineers to grant permission for the alteration or occupation or use of a Corps civil works project if the Secretary determines that the activity will not be injurious to the public interest and will not impair the usefulness of the project.

The Environmental Assessment has concluded there are no significant impacts to the human environment associated with the rehabilitation of IR 71 in relation to West Columbus Local Protection Project.



SECTION 408 WEST COLUMBUS
Interstate Route 71 ROAD WIDENING PROJECT
FRANKLIN COUNTY, OHIO

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The brief and concise nature of this document is consistent with the 40 CFR requirements of the National Environmental Policy Act (NEPA) to reduce paperwork and delay by eliminating duplication with existing environmental documentation, incorporating pertinent material by reference and by emphasizing interagency cooperation. The majority of data collection and analysis in this document was performed by Ohio Department of Transportation conjunction with the U.S. Army Corps of Engineers (Corps).

1.0 PROJECT DESCRIPTION

1.1 Project Background

This Environmental Assessment (EA) examines the potential environmental impacts of the West Columbus Interstate Route (IR) 71 road widening project located in Franklin County, Ohio and the projects effects on the West Columbus Local Protection Project. The purpose of the EA is to analyze the potential environmental impacts of the proposed project and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

The West Columbus, Ohio, Local Protection Project (WCOLPP) is located in Franklin County, Ohio, along Dry Run and the Scioto River in the western portion of the City of Columbus. The protection extends approximately 2,400 feet along the lower right descending bank of Dry Run and continues from its confluence with the Scioto River along the right descending bank and floodplain of the Scioto River for approximately 7.2 miles.

1.2 Purpose, Need, and Authorization

The purpose of this project is to design and construct improvements to IR 71 from south of the IR 270 interchange to the junction with IR 70 and State Route (SR) 315. Currently, the volume of traffic and heavy vehicles is causing the decline of pavement conditions along IR 71. Ohio Department of Transportation (ODOT) has identified sections of pavement that are expected to receive a critical rating. Crash patterns in the project area indicate that congestion issues may be contributing to safety concerns, particularly around the interchanges. In addition, to pavement condition, congestion, and safety concerns on IR 71, there are merge conditions at the IR 71 and IR 270 interchange. The need to improve IR 71 is to provide suitable pavement, maintain adequate Level of Service (LOS) and increase safety in the corridor for projected traffic volumes.

The proposed project will potentially effect the Corps West Columbus Local Protection Project. Section 14 of the Rivers and Harbors Act of 1899 and codified in 33 USC 408 (Section 408) authorizes the Secretary of the Army, on the recommendation of the Chief of Engineers of the U.S. Army Corps of Engineers to grant permission for the alteration or occupation or use of a Corps civil works project if the Secretary determines that the activity will not be injurious to the public interest and will not impair the usefulness of the project.



2.0 ALTERNATIVES DISMISSED FROM FURTHER CONSIDERATION

2.1 Alternative considered but eliminated- Pavement Rehabilitation

Alternative 2, Pavement Rehabilitation, would involve pavement rehabilitation only. This alternative only meets part of the P&N regarding deficient pavements. This alternative was dismissed from further consideration as it does not address capacity issues.

3.0 PROPOSED ACTIONS AND ALTERNATIVES

3.1 Alternative 3- Proposed Action Alternative (PAA)

The PAA would involve pavement rehabilitation and the addition of one lane in each direction. This alternative will provide lane continuity between the improvements from two ODOT contracts. This alternative was selected as the proposed action alternative based upon its ability to meet the purpose and need elements by providing suitable pavement, maintain adequate LOS, and increase safety in the corridor for projected traffic volumes without significant cost difference over the other alternative. The proposed project will alter eight locations of the West Columbus Local Protection Project (LPP). These impacts are listed and described below. See below for impact area location maps.

- a) ODOT Area A: LPP feature impacted: earthen levee embankment. Roadway ditch cutting into levee along Frank Road. The widening of Frank Road would require the new roadway ditch to cut into the river slope of the levee. The proposed roadway ditch would steepen the river slope of the levee from 2.5H: 1V to 2.0H: 1V and add six feet of soil fill to the embankment on the land side.
- b) ODOT Area B: LPP feature impacted: Sheet pile cutoff extending beyond I-wall. Sheet pile cutoff wall within bridge abutment embankment at Greenlawn Avenue Bridge. The upper three feet of sheet piling will be encased in foundation concrete.
- c) ODOT Area C: LPP feature impacted: I-wall on Greenlawn Avenue. Interchange Ramp A3 would be realigned over existing I-wall. The existing I-wall will be removed and a new I-wall installed approximately ten feet to the east existing I-wall. Exposed height of the new I-wall would range from 3.5 to 4.4 feet.
- d) ODOT Area D: LPP feature impacted: Gatewell on Greenlawn Avenue. Interchange Ramp A3 would be realigned over existing Gatewell Number. 9 requiring the relocation of Gatewell Number 9 to the east of I-wall.
- e) ODOT Area E: Areas identified by ODOT as “not impacted”: reaches of I-wall and T-wall north of Frank Road to Greenlawn Avenue. IR 71 southbound and interstate Ramp F (Greenlawn to IR 71 southbound) would be expanded or relocated closer to the existing floodwall. This interstate expansion or relocation also requires alteration to existing highway-related appurtenances (guardrail, drainage interception and control features, signage, light fixtures, etc.).



f) ODOT Area F: Construction of IR 71 northbound and Ramp A5 would require the existing concrete I-wall to be offset approximately ten feet to the East. An approximately 50 feet section would be subjected to flood exposure during construction of the proposed I-wall. Mitigation for flood exposure would consist of an on-site supply of sand bags for use during a flood event while under construction.

g) ODOT Area G: LPP feature impacted: Abutment and pump stations. Demolition and construction of an I-70 eastbound bridge over the Scioto River, construction of a new bridge for Ramp C5 over the Scioto River, and construction of IR 71 northbound Ramp A5. The existing I-70 EB Bridge would be completely removed and the proposed structure would consist of a multi-span bridge with a total length of 1,190 ft. The proposed West I-70 eastbound bridge abutment would be constructed behind the existing abutment and into levee high ground. The proposed West bridge abutment would also be constructed into levee high ground. Approaches for both proposed bridges spanning the Scioto River would span pump station ST1 and ST1A. Access to LPP components (i.e. alignment, pump stations, and gatewells) would be impacted.

h) ODOT Area H: LPP feature impacted: Electric poles. Relocation of existing overhead high transmission electrical poles. The proposed construction along IR 71 northbound and Ramp A5 would require the relocation and raising of the overhead high voltage transmission poles located along the eastern bank of the Scioto. Proposed locations of transmission poles and resulting potential impacts to the LPP are unknown to the Corps at this time.

3.2 No Action Alternative (NAA)

Under the NAA (Alternative 1), ODOT would not construct the proposed improvements but instead ODOT would perform basic routine maintenance of the existing facility. Basic maintenance activities would not address or improve pavement deficiencies, congestion, or crashes. This alternative was considered unacceptable due to safety hazards for the public in the proposed project area.

4.0 ENVIRONMENTAL SETTING AND CONSEQUENCES

4.1 Location

The proposed project involves the rehabilitation of IR 71 from north of the Stringtown Road Interchange to SR 315 in the City of Columbus, located in Franklin County, Ohio. The existing facility is two lanes in each direction from the Stringtown Road interchange to north of the IR 270 interchange. Project location mapping can be found below.



would not likely be influenced by future climate change. For the same reasons, there are also no impacts expected with respect to climate as a result of the NAA.

4.4 Terrestrial Habitat

An Ecological Survey Report prepared by consultant, Lawhon & Associates, Inc. identified terrestrial habitat within the proposed project area that consists of common mixed vegetation and trees and includes developed open space (mowed right-of-way, single family housing, parks, etc.), scrub/shrub (true shrubs, and young trees), Upland Forest (uplands dominated by trees), and Floodplain Forest dominated by trees. No unique or high quality terrestrial habitat occurs within the proposed project area.

The proposed project is within the known range of several federally listed species. Four state species were identified within one (1) mile of the proposed project area by an ODNR Ohio Heritage Program review. Field survey for suitable federally listed mussel habitat was completed on August 19, 2014. Stream 4 was the only stream identified within the project study area that may contain suitable habitat for the any of the mussels listed above. This stream is listed as a Group 1 stream, and is not known to contain federally listed species. No evidence of mussel habitat including live mussel beds, freshly deceased mussels, weather dead shells, or shell fragments were observed during the reconnaissance.

The known federal and state listed species are indicated below:

- The federally-endangered Indiana bat (*Myotis sodalis*). Six trees possessing potentially suitable roosting habitat (PRTs) for the Indiana bat were located within the proposed project area, however, no trees will be removed. No impacts anticipated.
- The proposed federally-endangered Northern long-eared bat (*Myotis septentrionalis*). The Northern long-eared bat has similar habitat to the Indiana bat. In addition, no man-made structures will be impacted by the proposed project and no caves were identified. No impacts anticipated.
- The federal species of concern Bald Eagle (*Haliaeetus leucocephalus*). The Bald Eagle tends to nest within two miles of ample water and fish and also prefers a secluded nesting site. A Bald Eagle was sighted within 0.3 miles of the proposed project area in 2011, however, no nesting activity was reported within 1/2 mile of the proposed project area. No impacts anticipated.
- The federally-endangered Clubshell (*Pleurobema clava*). No suitable habitat was identified within the proposed project area. No impacts anticipated.
- The federally-endangered Northern Riffleshell (*Epioblasma torulosa rangiana*). No suitable habitat was identified within the proposed project area. No impacts anticipated.
- The Rayed Bean (*Villosa fabilis*). Suitable habitat was identified within the proposed project area, however, no evidence of the mussel species was found. No impacts anticipated.
- The federally-endangered Snuffbox (*Epioblasma triquetra*). No suitable habitat was identified within the proposed project area. No impacts anticipated.
- The federally-threatened Rabbitsfoot (*Quadrula cylindrica cylindrica*). No suitable habitat was identified within the proposed project area. No impacts anticipated.



- The federally endangered Scioto madtom (*Norturus trautmani*). No suitable habitat was identified within the proposed project area. This species is only known from the Darby Creeks drainage. This drainage will not be impacted, therefore, no impacts anticipated.
- The state-endangered Goldeye (*Hiodon alosoides*). None of the streams within the proposed project area are large with swift currents, therefore no suitable habitat was identified. No impacts anticipated.
- The state-threatened Paddlefish (*Polyodon spathula*). None of the streams within the proposed project area are large with sluggish pools & backwaters, therefore no suitable habitat was identified. No impacts anticipated.
- The state-threatened Tippecanoe darter (*Etheostoma tippecanoe*). Stream 4 has suitable substrates, although the water quality is not suitable for the species. No impacts anticipated.
- The state species of concern River redhorse (*Moxostoma carinatum*). None of the streams within the proposed project area are large, therefore no suitable habitat was identified. No impacts anticipated.

Construction activities associated with the rehabilitation of IR 71 would take place in previously disturbed areas along existing road right-of-ways. Only short-term temporary impacts during construction area anticipated to occur.

4.5 Floodplains

Executive Order 11988 requires Federal agencies to consider the potential effects of their proposed actions to floodplains. In order to determine the PAA's potential floodplain impact, the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) was reviewed and the proposed project area is located in a regulated floodplain.

The floodplain coordination with the City of Columbus has been completed by ODOT.

There are no impacts to floodplains anticipated as part of the NAA.

4.6 Prime and Unique Farmland

The Farmland Protection Policy Act (FPPA) requires Federal agencies to minimize the conversion of prime and unique farmland to non-agricultural uses. Based upon review of U.S. Census Maps, U.S. Geologic Survey (USGS) topography maps, and U.S. Department of Agriculture (USDA) important Farmland maps, the proposed project is located in an urbanized area. The proposed project is located in an area zoned for non-agricultural purposes and is not located in an agricultural district. Based on the scope and type of proposed project, along with the amount of right-of-way needed, the proposed project meets the criteria/conditions of the Memorandum of Understanding (MOU) For Farmlands between the Natural Resource Conservation Service (NRCS), Federal Highways Administration (FHWA), and ODOT, executed on 15 December 2011. No further coordination is required. As the project is not located in an agricultural area or district, it was determined that completion of the Farmland Conversion Impact Rating Form (FCIR), and further coordination is not required. Based upon this determination, the PAA would have no impact on Prime or Unique, Statewide, or Locally important farmland.



There are no impacts to Prime and Unique Farmland anticipated as part of the NAA.

4.7 Aquatic Habitat/Water Quality

The project is located within the Scioto River Watershed. This section of the Scioto River, from Big Darby Creek to the Olentangy River, is listed on Ohio's 2016 Section 303(d) list of impaired waters as found in the Ohio 2016 Integrated Water Quality Monitoring and Assessment Report. This was due to the pollutants phosphorus, bacteria, and sediment. Implementation of the PAA would not result in any new discharges of a pollutant. Best Management Practices (BMPs) would be used throughout the project. The PAA would require work to take place on the banks of the Scioto River at the West Columbus LPP.

Construction of the PAA will avoid any permanent and temporary in-stream impacts. Therefore, under the Clean Water Act, a 404 permit is not needed for this action. A National Pollutant Discharge Elimination System Permit would be required for the proposed project. In the long term, the implementation of the PAA is expected to have no impact on the aquatic habitat and water quality within the proposed project area.

As selection of the NAA would entail no changes to the project area, there are no impacts to aquatic habitat and water quality anticipated as part of the NAA/

4.8 Wetlands

An Ecological Survey Report, dated September 24, 2014, was prepared by Lawhon & Associates, Inc. The report identified seven category 1 wetlands in the proposed project area. Category 1 wetlands are defined as wetlands that support minimal wildlife habitat, have minimal hydraulically and recreational functions, do not provide critical habitat for threatened or endangered species, and are often hydraulically isolated with low diversity (ODOT). The proposed project would not impact the identified wetlands. Therefore, there are no anticipated impacts to wetlands as part of the PAA or NAA.

4.9 Wild and Scenic Rivers

There are no National Scenic Rivers or State Scenic Rivers within the project area. Therefore, no impacts to these resources are anticipated as part of the PAA or NAA.

3.10 Hazardous, Toxic, and Radioactive Waste (HTRW)

The project was reviewed by the HTRW office at the Huntington District. They determined that no further studies are warranted for this project.



4.11 Cultural Resources

A Section 106 Request for Review (RFR) was prepared by Lawhon & Associates, Inc. on September 5, 2014. The RFR provided mapping illustrating the proposed project area and proposed improvements, a photographic log of the proposed project area and a records check. The records check included a review of electronic data maintained by the Ohio State Historic Preservation Office (OSHP) to identify properties within the proposed project area that were listed on or eligible for listing in the National Register of Historic Places (NRHP), and in the Ohio Archaeological Inventory (OAI) and Ohio Historic Inventory (OHI). Furthermore, the 2009 Ohio Historic Bridge Inventory dated April 28, 2010, was reviewed.

The project was also reviewed by the district archaeologist. The following was provided: This project will involve upgrading Interstate Route 71 between Grove City, Ohio and Columbus, Ohio in Franklin County, Ohio. The work activities will include a rehabilitation of pavement for 5.22 mile segment of interstate including full depth pavement and widening, all performed within existing Interstate Right of Way. This type of activity occurs in areas previously disturbed by interstate development and is covered within a Programmatic agreement between ODOT and Ohio State Historic Preservation Office (Stipulation 4A, November 2011), with "minimal potential to cause effects". It is with this information that the District Archeologist recommends this project will have no potential to cause effects to NHRP historic properties. Therefore, the District's responsibilities as they pertain to this action under Section 106 of the National Historic Preservation Act (NHPA) are fulfilled.

If unanticipated archaeological deposits or human remains are discovered during construction, all work near the location of the discovery shall cease and the ODOT, Office of Environmental services shall be contacted immediately. The Ohio State Police, the Franklin County Sheriff, and Ohio State Historic Preservation Office must also be notified immediately if human remains are discovered.

4.12 Threatened and Endangered Species

The proposed project is within the known range of the Indiana Bat, Northern Long-eared bat, Clubshell mussel, Northern riffleshell mussel, Rayed bean mussel, Snuffbox mussel, Rabbitsfoot mussel, and Scioto madtom. The Bald Eagle is afforded protection under the Bald and Golden Eagle Protection Act. Proposed project impacts were provided by ODOT in an MOA Coordination with the Ohio Division of Natural Resources and U.S. Fish and Wildlife Service (USFWS) (September 30, 2014). Responses were received from ODNR (October 28, 2014) and USFWS (October 28, 2014) and the agencies did not have specific comments regarding the stream impacts (See Appendix B for agency coordination). USFWS through correspondence stated that the Service has not objection to the project provided BMPs are implemented during and following construction activities to minimize water quality impacts and impacts to fish and wildlife habitats. USFWS also stated that staging areas should be kept away from streams, and all disturbed areas in the project vicinity should be mulched and re-vegetated



There are six trees possessing potentially suitable roosting habitat for the Indiana bat were located within the proposed project area, however, no trees will be removed. The Northern Long-eared bat has similar habitat to the Indiana bat. In addition, no man-made structures will be impacted by the proposed project and no caves were identified. As there will be no tree clearing activities associated with the PAA, the proposed project would have no effect on the Indiana Bat, Northern Long-eared bat, and Bald Eagle. No suitable habitat was identified for the Scioto madtom and this species is only known from the Darby Creeks drainage. Therefore, the PAA would have no effect on the Scioto madtom.

A Field survey for suitable federally listed mussel habitat was completed on August 19, 2014. No evidence of mussel habitat including live mussel beds, freshly deceased mussels, weathered dead shells, or shell fragments were observed during the reconnaissance. The PAA would have no effect on the Clubshell mussel, Northern riffleshell mussel, Rayed bean mussel, Snuffbox mussel, and Rabbitsfoot mussel as no suitable habitat was identified in the proposed project area. No Section 7 consultation under the Endangered Species Act is required.

No impacts to threatened or endangered species are anticipated to occur from the PAA or the NAA.

4.13 Air Quality

According to U.S. Environmental Protection Agency (USEPA) website, Franklin County, Ohio is classified as “in attainment” (maintaining applicable standards) for all criteria pollutants except the Ohio 2008 Eight-Hour Ozone (0.075ppm) which is in “marginal nonattainment.” Emissions from construction equipment would occur during the construction period. Contractors would operate all equipment in accordance with local, State, and Federal regulations. The PAA is exempted by 40 CFR Part 93.153 from making a conformity determination, since estimated emissions from construction equipment would not be expected to exceed de minimis levels, direct emissions of a criteria pollutant, or its precursors. The majority of impacts would be short-term, localized, and would occur only during construction phase activities. Air quality effects may continue to occur after construction due to the proposed generators but impacts would be minor. Therefore, impacts to air quality under the PAA would be minor.

Impacts to air quality are not anticipated to occur as part of the NAA as Franklin County would remain in “marginal nonattainment” for Ozone criteria.

4.14 Noise

Existing noise levels in the project area are equal to normal for residential and urban areas. The noise associated with construction would be short in duration and would only occur during daylight hours. Noise is measured as Day Night average noise levels (DNL) in “A-weighted” decibels that the human ear is most sensitive to (dBA). There are no Federal standards for allowable noise levels. According to the Department of Housing and Urban Development Guidelines, DNLs below 65 dBA are normally acceptable levels of exterior noise in residential areas. The Federal Aviation Administration (FAA) denotes a DNL above 65 dBA as the level of significant noise impact.



Several other agencies, including the Federal Energy Regulatory Commission, use a DNL criterion of 55 dBA as the threshold for defining noise impacts in suburban and rural residential areas. According to Dr. Paul Schomer in his 2001 Whitepaper, while there are numerous thresholds for acceptable noise in residential areas, research suggests an area's current noise environment, which has experienced noise in the past, may reasonably expect to tolerate a level of noise about 5 dBA higher than the general guidelines. The Corps Safety and Health Requirements Manual provides criteria for temporary permissible noise exposure levels (see Table 1 below), for consideration of hearing protection or the need to administer sound reduction controls.

Duration/day (hours)	Noise level (dBA)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105

Construction noise would be similar to that of farm equipment and other small machinery used in the local area. A backhoe, end loader, road grader and/or vibratory roller are examples of equipment that is likely to be used during construction. Each emits noise levels around 85 dBA at 45 feet. Construction equipment would be operated during daylight hours when many residents are at work; therefore a reasonable exposure time of two hours would be expected during the time residents may be home during the day. Peak outdoor noise levels ranging from 78-90 dBA would occur during the time in which equipment is directly in front of or in proximity to homes and businesses (within 25-100 feet). A maximum noise exposure of approximately 98 dBA, for one hour could occur if equipment were within 10 feet of homes and business. The noise projections do not account for screening objects, such as trees, outbuildings or other objects that muffle and reduce the noise being emitted. The outdoor construction noise would be further muffled while residents are inside their homes. While the construction noise generated would be considered unacceptable according to HUD and FAA standards, these limited exposures and time intervals are still within allowable Corps safety levels. Further, they are similar to typical neighborhood noise generated by gas powered lawnmowers in the local area, which could range from 90-95 dBA at three feet and 70-75 dBA at 100 feet. Residents being exposed to these noise levels would occur if and/or when residents are home and outdoors.

Noise associated with the PAA would be limited to that generated during construction. Due to daytime construction and the short and limited duration of elevated noise levels associated with the PAA, impacts from the noise to local residences and businesses would be temporary and minor. There would be no change in noise with the NAA.



4.15 Socioeconomic Conditions

Executive Order (E.O.) 12898 requires Federal actions to address environmental justice in minority populations and low-income populations. According to the U.S. Census Bureau, the 2015 population estimate for Franklin County was 1,251,722, and does not contain significant minority populations.

The 2015 census indicates Franklin County is 69.8% white and has a median household income of \$51,890 compared with the median household income of \$48,849 for the State of Ohio. Individuals residing in the county below the poverty level is 17.3% compared to 15.8% statewide.

Some visual changes would occur at each site; however, they would be very similar to existing structures already located at the sites. Implementation of the PAA would aid in protection of safety; thereby improving IR 71. No homes or buildings would be impacted by the proposed project; therefore, the PAA meets the directive of EO 12898 by avoiding any disproportionately high adverse human health or environmental effects on minority or low income populations.

No impacts to minority or low income populations are anticipated to occur from the NAA.

4.16 Aesthetics

The project area is urban, primarily consisting of residential, recreational and industrial properties. Temporary disturbance of the local aesthetics would be anticipated during construction; however after construction, the project area would mostly be restored to its preconstruction conditions. New structures or alterations to existing structures would be minor; adding very little visual impact after construction.

Neither the PAA nor NAA would significantly impact local aesthetics.

4.17 Transportation and Traffic

Under the PAA, traffic would be maintained using part-width construction techniques which would follow ODOT's Permitted Lane Closure Policy. Three lanes must be maintained at all times, with limited closures to one lane during select nighttime hours. Closure of the Greenlawn Avenue ramps and Frank Road ramps would be required during work in those areas. The Contractor will coordinate with law enforcement and emergency services regarding the Maintenance of Traffic (MOT) plan and would be responsible for providing notification prior to the start of construction activities. In addition, a press release will be issued by the District Public Information Officer (PIO) prior to the start of construction activities. Impacts anticipated to occur from the PAA would be minimal and temporary.

No impacts to transportation and traffic are anticipated to occur from the NAA.



4.18 Health and Safety

Substantial impacts will not occur to health and educational facilities, public utilities, fire, police, emergency services, religious institutions, or public transportation facilities. Inconveniences will be experienced by public services (fire, police, and emergency services) as a result of delays during construction; but the inconvenience will be temporary and short in duration. Emergency services and schools will be notified of any delays and closures associated with construction. Prior to construction activities, ODOT will contact Police and Fire Departments to provide them with maintenance of traffic and detour information as well as the schedule for construction activities. The PAA has been designed to maintain adequate level of service and increase safety in the corridor for projected traffic volumes. Therefore, the PAA is anticipated to have a long term beneficial impact on safety of the project area. There are no impacts to health as a result of the PAA.

Under the NAA, inadequate level of service in the projected long-term would continue, perpetuating safety concerns. No impacts to health are anticipated to occur from the NAA.

4.19 Cumulative Effects

The Corps must consider the cumulative effects of the proposed project on the environment as stipulated in the NEPA. Cumulative effects are "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or Non-Federal) or person undertakes such actions". Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR Part 1508.7 Council on Environmental Quality [CEQ] Regulations).

The cumulative effects analysis is based on the potential effects of the proposed project when added to similar impacts from other projects in the region. An inherent part of the cumulative effects analysis is the uncertainty surrounding actions that have not yet been fully developed. The CEQ regulations provide for the inclusion of uncertainties in the analysis and states that "when an agency is evaluating reasonably foreseeable significant adverse effects on the human environment...and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking" (40 CFR 1502.22).

Temporal and geographical limits for this project must be established in order to frame the analysis. These limits can vary by the resources that are affected. The construction of IR 71 improvements would have minimal and insignificant negative impacts on the environment. Long term beneficial safety effects will result from the project. The temporal limits for assessment of this impact would initiate in 2005 with the completed construction of the West Columbus LPP and end 50 years after completion of this project. The geographical extent would be broadened to consider effects beyond the PAA. The geographical extent considered is the Scioto River Watershed.

This section of the Scioto River, from Big Darby Creek to the Olentangy River, is listed on Ohio's 2016 Section 303(d) list of impaired waters as found in the Ohio 2016 Integrated Water



Quality Monitoring and Assessment Report. This was due to the pollutants phosphorus, bacteria, and sediment. Ohio EPA has only scheduled a few TMDL (total maximum daily loads) projects during the next two years. Because Ohio’s TMDL process begins with a watershed assessment, all TMDLs to be completed in the next two years are already in progress. Since the process for finalizing TMDLs is uncertain following the Ohio Supreme Court decision Ohio EPA does not anticipate submitting very many TMDLs to U.S. EPA for approval in the short term. However, the agency is still committed to restoring water quality and will be exploring other alternatives to this end in both the short and long term.

Section 4.0 documents the existing environment and potential environmental effects of the PAA and NAA with respect to existing conditions. The effects of the PAA, as discussed beforehand, are localized and minor. Past actions that may result in similar effects may include the initial construction of the flood wall. No reasonably foreseeable future actions that would have similar impacts as the proposed action were identified. In scoping cumulative effects issues, no resources were identified as having a potential to be significantly affected. Only minor and temporary impacts to ecological resources would be sustained with the implementation of the PAA. These resources would be reestablished upon completion of construction.

The proposed project will not result in a reasonably foreseeable secondary or cumulative impact. The proposed improvements are expected to have only positive impacts of reduced congestion, reduced crashes, and acceptable pavement conditions on the local community. Given the overall beneficial effect from implementation of the PAA, there is expected to be a positive, though small, cumulative effect on safety based on past, present, and reasonably foreseeable actions.

5.0 Status of Environmental Compliance

The PAA is in full compliance with all local, state, and Federal statutes as well as Executive Orders. This compliance is documented below in Table 2.

Table 2 - Environmental Compliance Status			
Statute/Executive Order	Full	Partial	N/A
National Environmental Policy Act (considered partial until the FONSI is signed)		X	
Fish and Wildlife Coordination Act	X		
Endangered Species Act	X		
Clean Water Act	X		
Wild and Scenic Rivers Act	X		
Clean Air Act	X		
National Historic Preservation Act	X		
Archeological Resources Protection Act			NA
Comprehensive, Environmental Response, Compensation and Liability Act	X		
Resource Conservation and Recovery Act	X		
Toxic Substances Control Act	X		
Quiet Communities Act	X		
Farmland Protection Act	X		



Executive Order 11988 Floodplain Management	X		
Executive Order 11990 Protection of Wetlands	X		
Executive Order 12898 Environmental Justice in Minority Populations and Low-Income Populations	X		

6.0 REQUIRED COORDINATION

6.1 Agencies Contacted

Coordination with the USFWS, USDA, ODNR, OEPA, OSHPO and respective Floodplain Managers was completed prior to publication of the EA.

6.2 Public Review and Comments

The EA and FONSI was made available for public review and comment for a period of 20 days, as required under NEPA. A Notice of Availability will be published in the local newspaper, The Columbus Dispatch, advising the public of this document's availability for review and comment. A copy of the EA will also be placed in the Columbus Metropolitan Public Library and made available on-line at <http://www.lrh.Corps.army.mil/Missions/PublicReview.aspx>.

7.0 CONCLUSION

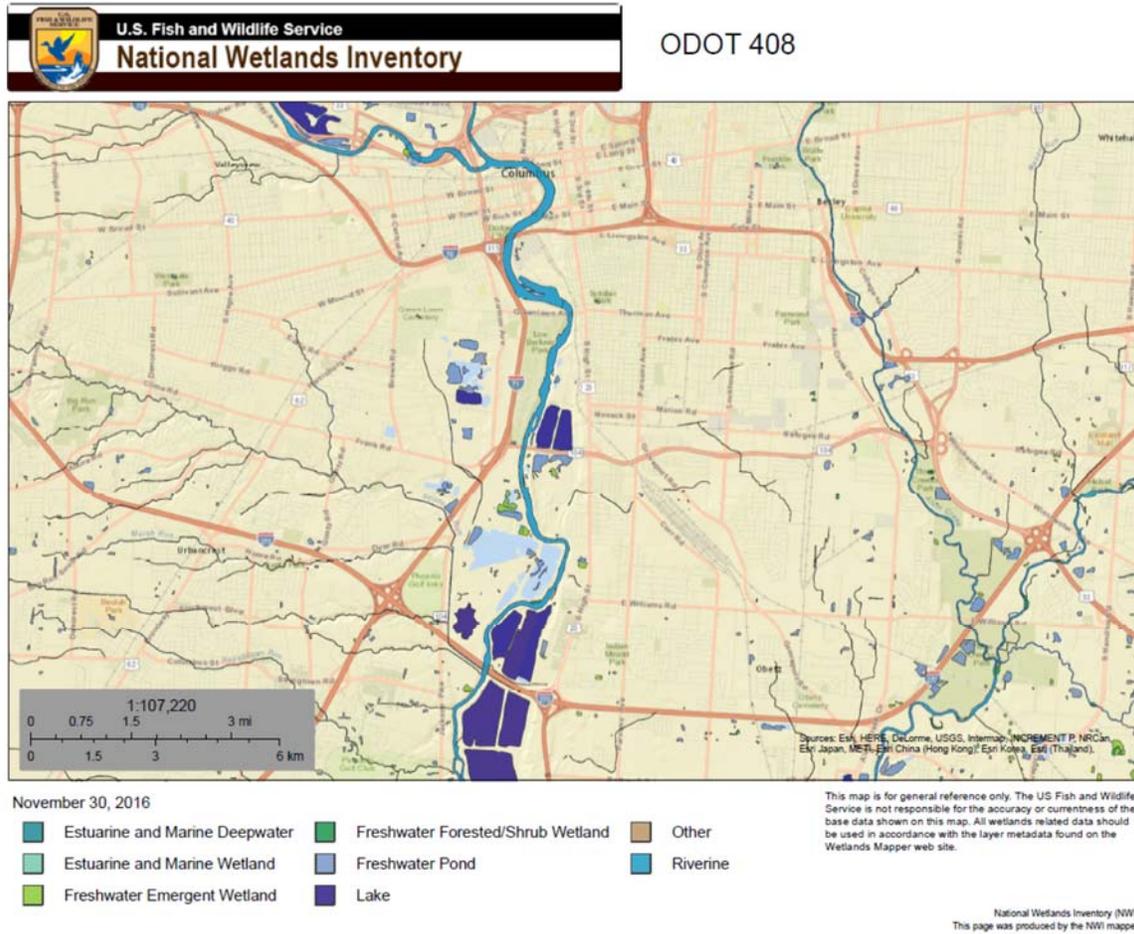
The proposed project is needed to improve IR 71 from south of the IR 270 interchange to the junction with IR 70/SR 315 to provide suitable pavement, maintain adequate level of service and increase safety in the corridor for projected traffic volumes. The undertaking of this project will impact eight areas of the West Columbus LPP. The proposed project will provide needed highway safety.

Construction would take place on previously disturbed land. A general NPDES permit is required for ground disturbing activities and staging during construction. Safety would be realized immediately with project implementation. Environmental effects associated with construction would be minor and temporary. BMPs would be implemented during construction to minimize impacts to residents and the environment. Therefore, the PAA would not be expected to have significant impacts on the human environment.



Appendix A- Exhibits

NWI Map





Appendix B- Coordination Letters



**OHIO DEPARTMENT OF TRANSPORTATION
INTER-OFFICE COMMUNICATION
Office of Environmental Services**

FRA-71-9.74
PID 93497
SG *Loz*
Sub *u*
9.11.14

CLEARANCE DATE: 9/11/14

TO: Ferzan Ahmed, District 6 Deputy Director
Attention: Brian Tatman, DEC
Sullivan
FROM: Timothy M. Hill, Administrator, Office of Environmental Services

SUBJECT: Cultural Resource Coordination – Stipulation 4(A) –
Appendix B – Undertaking with Minimal Potential to Cause Effects

PROJECT (CRS): FRA-71-9.74

(PID: 93497)

The subject project, submitted electronically on 9/10/14, involves modernization activities and safety upgrades along IR 71 between Grove City, Ohio and downtown Columbus, Ohio in Jackson and Franklin townships, Franklin County, Ohio. Work activities will include a major rehabilitation of the pavement for 5.22 mile segment of interstate including full depth pavement replacement and widening. Drainage improvement, traffic control upgrades, and new lighting will be installed. Five major bridge pairs and three drainage culverts will be rehabilitated. All proposed work activities are limited to the existing limited access right-of-way. The Area of Potential Effects (APE) is considered only those areas of existing interstate right-of-way and areas previously disturbed by interstate development where construction will occur.

An electronic records check was completed to review on-line data provided by the Ohio Historic Preservation Office. This search focused on the area immediately surrounding the interstate where modernization will occur. No known or inventoried architectural or archaeological resources will be impacted by the proposed upgrade. No Historic Properties (resources listed or eligible for the NRHP) or National Historic Landmarks were identified in the APE. The Interstate Highway System itself is generally exempt from further consideration based on the FHWA's SAFETEA-LU (Section 6007) re-authorization legislation of August 10, 2005. Furthermore, the thirteen involved bridges built between 1959 and 1963 include four Type 112 Concrete Slab Continuous structures (SFN 2507234, SFN 2507269, SFN 2507412, and SFN 2507447); six Type 322 Steel Beam Continuous structures (SFN 2507293, SFN 2507323, SFN 2507471, SFN 2507501, SFN 2507536, and SFN 2507560); two Type 395 Steel Culvert Filled structures (SFN 2507226, and SFN 2507358); and one Type 195 Concrete Culvert Filled Structure (SFN 2507463). These bridges are not considered eligible for inclusion on the National Register of Historic Places as a result of the updated 2009 *Ohio DOT Historic Bridge Inventory* (accepted April 28, 2010). In summary, bridge modernization and improvements to interchanges and divided highways beyond Historic Property boundaries have a minimal potential to cause effects to historic properties.

In accordance with Stipulation 4A and Appendix B of the Section 106 Programmatic Agreement approved on November 30, 2011 (*Agreement No. 16734*), ODOT-OES has determined that the proposed project is a type of undertaking with "minimal potential to cause effects" and is not a part of a larger undertaking. This completes the Section 106 review and no further cultural resource investigations are required at this time. You may process the environmental document with no further comment or involvement from the ODOT-OES unless the scope of the proposed undertaking was to change. The environmental document should note the date of this IOC for project Section 106 clearance. The environmental document should also note the date of the November 30, 2011 Programmatic Agreement as the basis for the Section 106 approval. A copy of this IOC should be attached to the appropriate environmental document. If you have any comments or questions regarding this determination, they may be addressed to *Stanley W. Baker* at stanley.baker@dot.state.oh.us or 614-466-5143.

TMH:swb
c: SHPO/PA file



UNITED STATES DEPARTMENT OF THE INTERIOR
U.S. Fish and Wildlife Service
Ecological Services Office
4625 Morse Road, Suite 104
Columbus, Ohio 43230
(614) 416-8993 / Fax (614) 416-8994



October 28, 2014

Timothy M. Hill, Administrator
Ohio Department of Transportation
Office of Environmental Services
1980 West Broad Street, 3rd Floor
Mail Stop #4170
Columbus, Ohio 43223

Attn: Michael Pettegrew, Megan Michael, Chris Staron

RE: **MOA Project Notifications, September 30, 2014**

TAILS	PID
03E15000-2015-I-0024	(PID 97209)
03E15000-2015-I-0025	(PID 87075)
03E15000-2015-I-0068	(PID 82388)
03E15000-2015-I-0026	(PID 93581)
03E15000-2015-I-0027	(PID 88790)
03E15000-2015-I-0028	(PID 96601)
03E15000-2015-I-0029	(PID 96601)
03E15000-2015-I-0030	(PID 86588)
03E15000-2015-I-0031	(PID 93611)
03E15000-2015-I-0032	(PID 96344)
03E15000-2015-I-0033	(PID 89486)
03E15000-2015-I-0034	(PID 95487)
03E15000-2015-I-0035	(PID 89344)
03E15000-2015-I-0037	(PID 93172)
03E15000-2015-I-0039	(PID 92584)

Dear Mr. Hill,

This is in response to your September 30, 2014 MOA Project Notifications letter, requesting U.S. Fish & Wildlife Service (Service) review and comment on 15 projects involving bridge or culvert replacements and/or roadway improvements on essentially existing alignments, and other projects that meet a Nationwide 404 Permit. These project notifications are in accordance with the Memorandum of Agreement (MOA) for Interagency Coordination for Highway Projects Which Involve Stream Crossings and/or Minor Wetland Fills and the Programmatic Consultation (PC) between USFWS, FHWA, and ODOT.

Please note that the **TRU-Anderson-Morris Road (CH 46) (PID 91012)** and **POR-43-82-20.77-0.00 (PID 86963)** projects will be coordinated separately to address conservation measures intended to minimize potential impacts to eastern massasauga (*Sistrurus catenatus*) that could result from the proposed bridge replacement projects.

Please note that the effect call in regard to the CUY-77-13.80 IB CCG6B (PID 82388) and CUY-Cleveland Towpath Trail Ph 4 (PID 87075) projects have been changed from no effect to may affect, but not likely to adversely affect the Indiana bat. Additionally, the LUC-25-7.01 (PID 96344) project impacts for Indiana bat and northern long-eared bat have been increased from one potential roost tree to four potential roost trees in order to more accurately reflect total impacts within the proposed construction limits.

FISH & WILDLIFE COORDINATION ACT COMMENTS

Unavoidable impacts to streams should be mitigated, and existing riparian habitat zones should be maintained to the maximum extent possible. Culverts should be placed to allow free movement of aquatic fauna. We recommend using native vegetation to control erosion, or, at a minimum, using native vegetation in combination with riprap or similar materials. In addition, staging areas should be kept well away from these aquatic features, and all disturbed areas in the project vicinity should be mulched and re-



vegetated with native plant species. The Service supports and recommends mitigation activities that reduce the likelihood of invasive plant spread and encourage native plant colonization that will benefit native pollinators. Prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats. We recommend seeding all disturbed areas during construction to encourage establishment of vegetative cover and to decrease erosion.

INDIANA BAT (*MYOTIS SODALIS*) AND NORTHERN LONG-EARED BAT (*MYOTIS SEPTENTRIONALIS*)
COMMENTS

We note and appreciate your thorough description of project-specific conditions regarding potential Indiana bat roosting and maternity habitat and efforts to avoid impacts to such habitat. On bridge replacement projects, we recommend that, prior to any bridge removal, the underside of the bridge be carefully examined for the presence of bats, especially from April 1 to September 30. If any bats are found roosting on the underside of the bridge, please immediately contact this office to provide this information.

The following projects lie within the range of the federally endangered **Indiana bat** and the **northern long-eared bat**, a species currently proposed for listing as federally endangered under the Endangered Species Act (ESA). In accordance with the 2007 Programmatic Consultation (PC) on the Indiana bat between FHWA/ODOT and USFWS, the following projects fall under the PCI category of impacts:

WOO-Fort Meigs Rd Widening (PID 92584)	MER-CR 144-4.30 (PID 89486)
MOT-Miamisburg Connector Trail (PID 95487)	LAK-Painesville Township Infrastructure (SRTS) (PID 93611)*
LUC-25-7.01 (PID 96344)*	HAM-SR 264-6.90/Five Points Intersection Improvements (PID 88790)
JAC-SR 93-0.15 (PID 86588)	CUY-77-13.80 IB CCG6B (PID 82388)*
CUY-Cleveland Towpath Trail Ph 4 (PID 87075)*	PER-SR 13-26.88 (PID 89344)
CLE-131-6.53/SR 131 Culvert Replacement Project (PID 97209)	GUE-SRTS 2015 (PID 93581)
STA-619-2.59 (Addendum) (PID 93172)	

The Service concurs with your determination that these 13 projects, as proposed, *may affect, but are not likely to adversely affect* the Indiana bat and northern long-eared bat. *Although winter tree clearing is not required for PCI-level projects under the Programmatic Consultation (PC) on the Indiana bat, please note that ODOT has committed to implement seasonal clearing restrictions, clearing all trees to be impacted by the project between October 1 and March 31, for the following projects:* WOO-Fort Meigs Rd Widening (PID 92584), MOT-Miamisburg Connector Trail (PID 95487), LUC-25-7.01 (PID 96344), JAC-SR 93-0.15 (PID 86588), CUY-Cleveland Towpath Trail Ph 4 (PID 87075), CLE-131-6.53/SR 131 Culvert Replacement Project (PID 97209), STA-619-2.59 (Addendum) (PID 93172), MER-CR 144-4.30 (PID 89486), LAK-Painesville Township Infrastructure (SRTS) (PID 93611), HAM-SR 264-6.90/Five Points Intersection Improvements (PID 88790) and CUY-77-13.80 IB CCG6B (PID 82388). *Implementation of these cutting dates will be protective of both Indiana and northern long-eared bats that may be roosting in the area.*

* Additional comments provided for this project in the letter.



The following projects fall under the PC2 category of impacts within the Indiana bat PC:

HOC-93-9.64/10.96 (PID 96601)

HOC-278-5.56 (PID 96601)

The Service concurs with your determination that these projects, as proposed, *may affect, but are not likely to adversely affect* the Indiana bat and northern long-eared bat. The Service appreciates ODOT's commitment to follow conservation measure A-1 of the Programmatic Consultation, clearing all trees to be impacted by these projects between October 1 and March 31. Implementation of these cutting dates will be protective of both Indiana and northern long-eared bats that may be roosting in the area.

Please note on all projects that involve tree clearing: If an applicant plans to clear trees prior to issuance of a 404 and/or 401 permit: 1) Section 7 consultation with the Service must be completed; and 2) No tree clearing on any portion of the project should occur until both the U.S. Army Corps of Engineers and Ohio EPA anticipate that issuance of both a 404/NWP and a 401 permit authorizing the project as a whole is imminent. This will ensure that clearing will be limited to the footprint of whichever alternative is ultimately permitted, and that no unnecessary clearing will occur.

ADDITIONAL SPECIES AND PROJECT COMMENTS

The CUY-77-13.80 IB CCG6B (PID 82388), CUY-Cleveland Towpath Trail Ph 4 (PID 87075) and LAK-Painesville Township Infrastructure (SRTS) (PID 93611) projects lie within the range of the Kirtland's warbler (*Setophaga kirtlandii*), a federally endangered species. We understand that all three projects will result in the unavoidable impacts to wooded shrub habitats within three miles of the Lake Erie Coastline. We appreciate ODOT's commitment to follow cutting date restrictions for this project, with no tree or brush clearing to occur from April 22 - June 1 or from August 15 - October 15. Based on this information, we concur with your determination that these projects *may affect but are not likely to adversely affect* the Kirtland's warbler.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the Endangered Species Act, of 1973, as amended, and are consistent with the intent of the National Environmental Policy Act of 1969, and the U.S. Fish and Wildlife Service's Mitigation Policy. *This concludes consultation, as required by section 7(a)(2) of the Endangered Species Act, on the 15 projects addressed in this letter.*

Should, during the term of this action, additional information on listed or proposed species or their critical habitat become available, if a proposed species becomes officially listed, or if new information reveals effects of the action that were not previously considered, consultation with the Service should be reinitiated to assess whether the determinations are still valid.



If you have questions, or if we may be of further assistance in this matter, please contact Marci Lininger at extension 27 or Karen Hallberg at extension 23 in this office.

Sincerely,

Jeromy Applegate
Acting Field Supervisor

cc: J. Kessler, ODNR, Office of Real Estate, Columbus, OH (*email only*)
P. Clingan, USACE, Ohio Regulatory Transportation Office, Columbus, OH (*email only*)
J. Lung, OEPA, Columbus, OH (*email only*)
B. Mitch, ODNR, Office of Real Estate, Columbus, OH (*email only*)



Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR

JAMES ZEHRINGER, DIRECTOR

Office of Real Estate
Paul R. Baldrige, Chief
2045 Morse Road – Bldg. E-2
Columbus, OH 43229
Phone: (614) 265-6649
Fax: (614) 267-4764

October 28, 2014

Timothy M. Hill, Environmental Administrator
Office of Environmental Services
Ohio Department of Transportation
1980 West Broad Street
Columbus, Ohio 43223

Attn: Matt Perlik, Mike Pettegrew

Re: 14-759; ODOT MOA Project Notifications Dated September 30, 2014

Project: The ODOT MOA Project Notifications dated September 30, 2014 involve bridge or culvert replacements and/or roadway improvements on essentially the existing alignments. The ODOT MOA Project Notifications dated September 30, 2014 includes the following PIDs: 96916, 96801, 96344, 92584, 97552, 93710, 86963, 93172, 91012, 93581, 93575, 89344, 97373, 97627, 93497, 95290, 89437, 89486, 92094, 95487, 97209, 88790, 86588, 98914, 96601, 91915, 91569, 88945, 82388, 87075 and 93611.

Location: These projects are located in ODOT Districts 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11 and 12.

The Ohio Department of Natural Resources (ODNR) has completed a review of the above referenced project. These comments were generated by an inter-disciplinary review within the Department. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.), the National Environmental Policy Act, the Coastal Zone Management Act, Ohio Revised Code and other applicable laws and regulations. These comments are also based on ODNR's experience as the state natural resource management agency and do not supersede or replace the regulatory authority of any local, state or federal agency nor relieve the applicant of the obligation to comply with any local, state or federal laws or regulations.

Fish and Wildlife: The Division of Wildlife (DOW) has the following comments.

These projects are within the range of the Indiana bat (*Myotis sodalis*), a state and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees: Shagbark hickory (*Carya ovata*), Shellbark hickory (*Carya laciniosa*), Bitternut hickory (*Carya cordiformis*), Black ash (*Fraxinus nigra*), Green ash (*Fraxinus pennsylvanica*), White ash (*Fraxinus americana*), Shingle oak (*Quercus imbricaria*), Northern red oak (*Quercus rubra*), Slippery elm (*Ulmus rubra*), American elm (*Ulmus americana*), Eastern cottonwood (*Populus deltoides*), Silver maple (*Acer saccharinum*), Sassafras (*Sassafras albidum*), Post oak (*Quercus stellata*), and White oak (*Quercus alba*). Indiana bat habitat consists of suitable trees that include dead and dying trees with exfoliating bark, crevices, or cavities in upland areas or

riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. If suitable trees occur within the project area, the DOW recommends that these trees be conserved. If suitable habitat occurs on the project area and trees must be cut, the DOW recommends cutting occur between October 1 and March 31. If suitable trees must be cut during the summer months, the DOW recommends a net survey be conducted between June 1 and August 15, prior to cutting. Net surveys should incorporate either nine net nights per square 0.5 kilometer of project area, or four net nights per kilometer for linear projects. If no tree removal is proposed, the project is not likely to impact this species.

CLE-131-6.53 (PID 97209)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

CUY-77-13.10 (PID 82388)

The DOW appreciates ODOT's commitment to avoid clearing scrub shrub habitat from April 22 through June 1, and from August 15 through October 15 to minimize any potential impacts to the Kirtland's warbler.

CUY-Towpath Trail Phase 4 (PID 87075)

The DOW appreciates ODOT's commitment to avoid clearing scrub shrub habitat from April 22 through June 1, and from August 15 through October 15 to minimize any potential impacts to the Kirtland's warbler.

D06-OBPP-Package 6-5 (PID 97627), MAD-C0084-2.51 Van Wagener Rd

The DOW understands that a live mussel was observed at this project location. Therefore, the DOW recommends that a mussel survey and relocation be conducted at the project site in accordance with the Ohio Mussel Survey Protocol.

HAM-SR 264-6.90 (PID 88790)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

HOC-278-5.56 (PID 96601)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

JAC-SR 93-0.15 (PID 86588)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

JEF-150-12.54 (PID 91569)

The DOW recommends no in-water work in Short Creek from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat.

LAK-SRTS Painesville (PID 93611)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

The DOW appreciates ODOT's commitment to avoid clearing scrub shrub habitat from April 22 through June 1, and from August 15 through October 15 to minimize any potential impacts to the Kirtland's warbler.

MER-CR 144-4.30 (PID 89486)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

MOT-Miamisburg Connect (PID 95487)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

STA-619-0259 Addendum (PID 93172)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

TRU-Anderson Morris (PID 91012)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

TUS-250-12.30 (PID 88945)

The DOW recommends no in-water work in Stone Creek from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat.

WOO-Fort Meigs Rd (PID 92584)

The DOW appreciates ODOT's commitment to seasonal tree clearing between October 1 and March 31 to minimize any potential impacts to the Indiana bat.

ODNR appreciates the opportunity to provide these comments. Please contact Brian Mitch at (614) 265-6387 if you have questions about these comments or need additional information.

Brian Mitch
ODNR Office of Real Estate
2045 Morse Road, Building E-2
Columbus, Ohio 43229-6693
(614) 265-6387
brian.mitch@dnr.state.oh.us

Appendix C- Mailing List

Environmental Assessment Mailing List

Honorable John R. Kasich
Office of the Governor
Riffe Center, 30th Floor
77 South High Street
Columbus, Ohio 43215-6117

Honorable Joyce Beatty
Representative in Congress
471 East Broad Street, Suite 1100
Columbus, Ohio 43215

Honorable Steve Stivers
Representative in Congress
3790 Municipal Way
Hilliard, Ohio 43026

Honorable Sherrod Brown
United States Senate
200 North High Street
Room 614
Columbus, Ohio 43215

Honorable Rob Portman
United States Senate
37 West Broad Street
Room 300
Columbus, Ohio 43215

Dan Everson
U.S. Fish and Wildlife Service
4625 Morse Road, Suite 104
Columbus, Ohio 43230

Mr. Steve Baker
Natural Resources Conservation Service
200 North High Street, Room 522
Columbus, Ohio 43215

Mr. Jeffrey Boyles
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Mr. John Kessler
Ohio Department of Natural Resources
2045 Morse Road
Columbus, Ohio 43216

Mr. Nathan Young
Ohio Historic Preservation Office
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Columbus Metropolitan Library
96 S Grant Ave.
Columbus, Ohio 43215

U.S. Environmental Protection Agency
Region 5
Attn: NEPA Compliance
77 West Jackson Blvd.
Chicago, IL 60604-3507