Draft Environmental Assessment

Sand Run Stabilization and Infrastructure Improvement Project

Summit Metro Parks, Summit County, OH
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Prepared by
EMH&T
5500 New Albany Road
Columbus, OH 43054

Prepared for
FEMA Region V, Project # 4360.13-R
536 South Clark Street, Sixth Floor
Chicago, IL 60605

FEMA

List of Acronyms and Abbreviations

ACS	American Community Survey
APE	Area of Potential Effect
AOP	Aquatic Organism Passage
BMP	Best Management Practices
CAA	Clean Air Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CEQ	Council on Environmental Quality
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
CWA	Clean Water Act
CMP	Corrugated Metal Pipe
EA	Environmental Assessment
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
HMGP	Hazard Mitigation Grant Program
HDPE	High-density Polyethylene
IPaC	Information for Planning and Consultation
MBTA	Migratory Bird Treaty Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NLEB	Northern Long-Eared Bats
NO_2	Nitrogen Dioxide
NO_x	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
O_3	Ozone
ODOT	Ohio Department of Transportation
ODNR	Ohio Department of Natural Resources
OEMA	Ohio Emergency Management Agency
OHC	Ohio History Connection
ORC	Ohio Revised Code
ORPS	Ohio Regulated Properties Search
OSHA	Occupational Safety and Health Administration
Pb	Lead
PM	Particulate Matter
RCP	Reinforced Concrete Pipe
RCRA	Resource Conservation and Recovery Act
SO_2	Sulfur Dioxide
SFHA	Special Flood Hazard Area
SHPO	State Historic Preservation Office
USACE	United States Army Corp of Engineers
U.S.C.	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGCRP	United States Global Change Research Program
USGS	United States Geological Survey

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1 BACKGROUND

1.1 Project Authority

Summit Metro Parks, the subrecipient, proposes to stabilize multiple sections of stream channel along Sand Run and an unnamed tributary to Sand Run, and to improve multiple culverts that carry unnamed tributaries under Sand Run Parkway, to reduce hazards associated with severe storms, flooding, and erosion. Summit Metro Parks applied to the Federal Emergency Management Agency (FEMA) through the Ohio Emergency Management Agency (OEMA) for $2,398,500 of grant assistance (total project cost: $4,898,500) under the Hazard Mitigation Grant Program (HMGP), application number 4360.13-R. The HMGP is authorized under Section 404 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. § 5170c. The key purpose of FEMA's Hazard Mitigation Grant Program is to ensure that the opportunity to take critical mitigation measures to reduce the risk of loss of life and property from future disasters is not lost during the reconstruction process following a disaster. The project reviewed here is related to Federal disaster declaration DR-4360-OH, severe storms, landslides, and mudslides between February 14, 2018 and February 25, 2018. The disaster was declared on April 17, 2018 and designated 22 counties in Southern and Eastern Ohio as eligible for public assistance. The declaration also made HMGP assistance available statewide to fund hazard mitigation measures.

This environmental assessment (EA) was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969; President's Council on Environmental Quality (CEQ) regulations to implement NEPA (40 Code of Federal Regulations [C.F.R.] Parts 1500 to 1508); U.S. Department of Homeland Security Instruction 023-01; and FEMA Instruction 108-01-1, NEPA implementing procedures. FEMA is required to consider potential environmental impacts before funding or approving actions and projects. The purpose of this EA is to meet FEMA's responsibilities under NEPA and to analyze the potential environmental impacts of the proposed project. FEMA will use the findings in this EA to determine whether to prepare an environmental impact statement for the proposed project or to issue a finding of no significant impact (FONSI).

In accordance with federal laws and FEMA regulations, the EA process for a proposed federal action must include an evaluation of alternatives and a discussion of the potential environmental impacts. As part of this NEPA review, the requirements of other environmental laws and executive orders are addressed.

1.2 Project Location

The proposed project is located within the Sand Run Metro Park, within the Cities of Akron and Fairlawn, Summit County, Ohio (see **Figure 1** of **Appendix A**). Summit Metro Parks has operated the 998-acre Sand Run Metro Park since its establishment in 1929. Summit Metro Parks was founded in 1921 as a metropolitan park district organized under Ohio Revised Code §1545. Its mission is to "conserve, sustainably manage and value natural resources for the health and

enjoyment of our community and inspire people to connect with nature through clean and safe parks." Over its 99-year history, Summit Metro Parks has grown significantly and currently manages 14,300 acres of land, including 16 parks and over 125 miles of trails. The Sand Run Metro Park predominantly serves Summit County. This county is approximately 419 square miles in size and has a population of approximately 541,810, based on the 2014–2018 five-year American Community Survey (ACS) estimates (U.S. Census Bureau 2019).

Sand Run Metro Park is the most visited park in the Summit Metro Parks system, with over 1.7 million visitors each year. The park features miles of hiking, biking, and jogging trails, two lodges, picnic shelters, soccer fields, and provides activities such as fishing, camping, sledding, and ice skating (see **Figure 2** of **Appendix A**). The park land is important historically as well. The area surrounding Mingo shelter is an indigenous archaeological site dating from the Late Woodland period (AD 600-1200). Portage Path was once an important Native American trail between the Cuyahoga and Tuscarawas rivers; later, it was the western boundary of the United States. A high ridge above the Wadsworth Area was a lookout point for General Elijah Wadsworth, who made his camp near the present-day Old Portage Area during the War of 1812. In the 1930s, Sand Run Parkway and many of the surrounding shelters and structures were constructed by the Civilian Conservation Corps. In 1974, the park district's Administrative Offices were moved to Sand Run Metro Park.

The overall Sand Run Stabilization and Infrastructure Improvement project area extends along approximately 2 miles of Sand Run Parkway including approximately 1.6 miles of Sand Run (between river miles 0.2 and 1.8), and approximately 0.60 miles of an unnamed tributary to Sand Run. The project includes 13 stream stabilization sites, 9 culvert improvement sites, and one site where an abrupt stream elevation change inhibits aquatic organism passage (see **Figure 3** of **Appendix A**). Sand Run Parkway is a two-lane private road that traverses the Sand Run Metro Park in an east-west direction and provides access to numerous park facilities and amenities. The road also provides a route of travel for an average of 4,400 vehicles per day in order to bypass congestion on both Market Street and Smith Road. Additionally, the City of Akron has a major sanitary sewer line that runs along Sand Run Parkway within the project area. All land within the proposed project area is owned by the subrecipient. Sand Run is a tributary to the Cuyahoga River with a confluence immediately downstream of the project area. In 2000, Ohio Environmental Protection Agency (Ohio EPA, 2000) indicated that Sand Run is a small, flashy, high-gradient headwater that is highly influenced by urbanization from the suburb of Fairlawn. Ohio EPA also indicated the stream contained poor biological communities due to severe bank erosion and embedded substrates.

1.3 Purpose and Need

The Sand Run Metro Park is founded around the Sand Run stream and a major unnamed tributary that enter the park from the west. The watercourses follow an average slope of 1.7% through the park, which results in high velocity stream flow conditions. Throughout the park, the streams are generally confined between the embankment for Sand Run Parkway and a natural hillside. In some sections of the streams, gabion baskets were previously installed to create a

retaining wall on one or both banks, confining the channels further. As an ongoing maintenance practice, Summit Metro Parks periodically installs rock channel protection and large natural boulders along the watercourses in an attempt to address channel bank erosion and protect the park's infrastructure. These prior stabilization improvements have exceeded their life span and are currently in various phases of failure.

Erosion along these streams is a constant concern for Summit Metro Parks. The National Climate Assessment indicates that, in the Midwest, extreme precipitation events and increased flooding due to climate change may damage infrastructure and property (USGCRP 2018). New and increased areas of erosion have been observed by park staff following recent intense rainfall and wind events. Sediment deposits in the stream can further alter flow, leading to additional erosion as the watercourse shifts. In addition, tree fall due to erosion along the stream has been noted by park staff. The loss of large trees along the watercourse leaves areas of stream bank unprotected which results in further erosion. As the park is a natural area with large trees growing close to the roadway, tree fall represents a safety hazard for motorists and park visitors.

Along the length of Sand Run Parkway, numerous culverts allow smaller, unnamed tributaries to drain under Sand Run Parkway to the larger stream channels. Many of these culverts are undersized, easily clogged with sediment, and often overtopped by flood waters. Flooding leaves sediment and debris on the roadway, destabilizes the roadway, and washes embankment material downstream. Flooded roads also pose a safety risk for motorists and park visitors.

Based on data from 2011 to 2018, the subrecipient spent over $70,000 annually (approximately $585,000 total) on materials, labor, and multiple engineering studies to address the issues associated with flooding and erosion within the park. Under current conditions, Sand Run Parkway is closed several times each year for maintenance following heavy rain events. Closure of Sand Run Parkway due to flooding and potential pavement instability results in a 4.4-mile detour (Revere Road to Smith Road to Riverview Road to Portage Path) for an average 4,400 vehicles per day and restricts access to the park's amenities for park visitors. In addition to Sand Run Parkway, one residential structure as well as park trails, cabins, parking areas, and a portion of the park service center are located adjacent to these waterways and would be adversely impacted by continuing erosion and flooding.

Ongoing deterioration of Sand Run Parkway also threatens the City of Akron's sanitary sewer infrastructure. The City owns and maintains a sanitary sewer that ranges in size from 30" to 42" and extends along Sand Run Parkway for the entire length of the project area along with 2,040 sewer laterals. This sewer conveys flow from the Fairlawn District, which covers 4,515 acres and serves approximately 6,557 parcels. The present cost to replace this sewer is valued at approximately $1,050 per linear foot.

The combination of the park's natural geology and stream flow conditions has resulted in circumstances that threaten park and municipal infrastructure, disrupt travel, create unsafe conditions, require frequent maintenance, and degrade aquatic habitat conditions and surface water quality, which together constitute the need for this project. To better understand these

ongoing issues, the subrecipient funded a Preliminary Engineering Report (EMH&T, 2018) to evaluate areas of stream erosion and instability and to analyze the hydraulic capacity of certain culverts along Sand Run Parkway within the park.

The purpose of the project is to protect community resources and infrastructure, maintain a safe route of travel along Sand Run Parkway, and improve aquatic habitat within the Sand Run Metro Park. Protection of community resources and infrastructure is listed as an explicit priority in both the 2013 and the most recent 2018 Summit County Hazard Mitigation Plans, approved by Ohio Emergency Management Agency and the Federal Emergency Management Agency (Summit County Emergency Management Agency, 2018). The State of Ohio Hazard Mitigation Plan (OEMA, 2019) identifies minimization of damage to property and societal disruptions from hazard events, such as infrastructure disruption, as a goal. Additionally, reduced bank erosion and sediment load in the stream will serve to improve aquatic habitat for fish and macroinvertebrates. These actions are consistent with Summit Metro Parks' resource management goals regarding land stewardship (Summit Metro Parks, 2016).

2 ALTERNATIVE ANALYSIS

NEPA requires FEMA to evaluate alternatives to the proposed project and describe the environmental impacts of each alternative. NEPA also requires an evaluation of the No Action alternative, which is the future condition without the proposed project being executed. This section describes the No Action alternative, the Proposed Action alternative, the Stream Stabilization Only alternative, and reviews the alternatives that were previously considered but dismissed.

2.1 Alternative 1 – No Action

Under the No Action alternative, the proposed stream stabilization and culvert improvements along Sand Run Parkway would not be performed. Excessive rain events and flood waters would continue to cause erosion and flooding along Sand Run Parkway, threatening infrastructure, causing temporary closures, detouring vehicular traffic, and limiting access to park amenities. In time, erosion would continue at the site, increasing the risk of further damage and closures.

2.2 Alternative 2 – Proposed Action

The Proposed Action has three components: (1) stream stabilization at 13 sites, (2) culvert improvements at 9 sites, and (3) creation of a custom fish passage at a site with an abrupt elevation change. All actions will occur on Sand Run and an unnamed tributary to Sand Run between Revere Road and the Cuyahoga Railroad bridge east of the Sand Run Metro Park Service Center, as identified in the Preliminary Engineering Report (EMH&T, 2018). Federal funds will be used for construction of 11 stream stabilization sites (Sites 1-8 and 13-15) and one culvert replacement (Culvert 37). The subrecipient will use matching funds via a grant from the Clean Ohio Green Space Conservation Program to construct the remaining improvements, which will serve as the park's required local match to the federal funds. The use of these monies as the match makes that work part of the overall federal action. That work is therefore included in the description of the Proposed Action.

The stream stabilization component will include ecological enhancements such as natural channel design techniques to improve aquatic habitat. Where possible, stream stabilization includes channel restoration with rock vanes, slope regrading using natural stone and native vegetation, and a natural meandering channel. These actions are consistent with Summit Metro Parks' resource management goals regarding land stewardship (Summit Metro Parks, 2016) and FEMA's guidance on Bioengineering Stabilization Methods (FEMA, 2017). Culvert structures will be upgraded to meet the hydraulic conveyance level of service for the 25-year design storm as established in the Ohio Department of Transportation Drainage Design Criteria for flood clearance on roadways based on the average daily traffic for Sand Run Parkway (ODOT 2020). All the work locations included in the Proposed Action were selected as those areas where stream stabilization and culvert improvements best meet the actionable goal of minimizing damage to property and infrastructure.

Sand Run Parkway is owned by the subrecipient, which has the jurisdictional authority to temporarily close portions of Sand Run Parkway to facilitate construction of the proposed improvements. The extent of maintenance of traffic required for each improvement shall be finalized during preparation of final engineering plans. Projects will be grouped together into construction packages, where feasible, to take advantage of reduced maintenance of traffic plans and roadway closure periods. The roadway will be used for access and staging of equipment.

2.2.1 Stream Stabilization

The first component of the Proposed Action (Stream Stabilization) would be implemented at 13 locations along Sand Run between Revere Road and the Cuyahoga Railroad bridge east of the Sand Run Metro Park Service Center (see **Figure 3** of **Appendix A**). All sites were identified as locations that need stabilization in order to protect existing infrastructure and park amenities.

Site 1 – Trail and Parkway Protection: Site 1 is located on the north stream bank of Sand Run immediately east (downstream) of Sand Run Road (see **Sheet 2**, **Figure 3** of **Appendix A**). The stream bank at this location is extremely steep (approximately 1.2:1) with a jogging trail and Sand Run Parkway located at the top of the embankment. The stream reach at this location is too narrow to allow for natural stream realignment or slope regrading. As such, at Site 1 a permanent cantilevered sheet pile wall will be installed at the toe of slope supporting a flatter 2:1 slope behind the wall to correct the existing slope stability deficiency. The proposed wall will extend from near the north end of the existing half height headwall supporting the existing arch culvert to the west face of the concrete storm sewer energy dissipation structure. The maximum exposed wall height is expected to be 7'-6".

Site 1 has minimal visibility to either pedestrian or vehicular traffic due to the steep slope, the number of trees, and the amount of brush in the area, reducing the need for aesthetic treatment.

Site 2 – Trail and Cabin Protection: Site 2 is located along the south bank of Sand Run approximately 0.83 miles east (downstream) of Sand Run Road (see **Sheet 3**, **Figure 3** of **Appendix A**). At this location, the stream bank is very steep, and erosion is threatening a primitive trail and a cabin located on the hillside above the trail. Improvement at Site 2 includes natural stream realignment and re-grading the slope to no steeper than 1.5:1. Cross vanes and single-arm rock vanes will be installed to reduce shear stress on the banks and minimize the size and volume of natural stone protection needed.

The work will provide significant benefits for both bank protection and aquatic habitat. The rock vanes work to modify stream flows, providing a variety of flow conditions and microhabitats for fish, ranging from scour channels and pools to slower backwater refuges. The rock placed within the stream channel will provide substrate for colonization by macroinvertebrates and provide benthic habitat for small fish. The vane structures will serve to reduce the ongoing erosion at this site, which contributes to instream siltation and embeddedness. The vegetated, natural stone

slope protection will provide canopy cover to the stream, provide shade to control instream temperatures, and supply leaf litter and woody debris to the stream, which is an integral component to the aquatic food web.

Site 3 – Trail Protection: Site 3 is located along Sand Run approximately 0.74 miles east (downstream) of Sand Run Road at the confluence of a minor unnamed tributary from the south (see **Sheet 3**, **Figure 3** of **Appendix A**). At this location, the south bank of Sand Run and the north bank of the unnamed tributary both show signs of erosion. A primitive trail runs between the two channels where the active erosion is occurring. In addition, there is a bridge over the minor tributary, which may become threatened by the channel bank erosion along the tributary. The project will install single-arm rock vanes on Sand Run along with slope regrading and vegetated, natural stone protection on the slope to protect the primitive trail located at the top of the slope. For the minor tributary, a J-Hook will be installed in the channel along with slope regrading with natural stone for the bank.

The use of the rock vane and the J-Hook will focus the stream flow along the channel centerlines, minimizing shear stress on the banks. The in-stream structures will also develop additional pools and increase instream habitat diversity. Along with the live stakes, which will increase streamside vegetative cover, this solution will improve aquatic and riparian habitat at this site.

Site 4 – Sand Run Parkway Protection: Site 4 is located along Sand Run beginning approximately 0.58 miles east (downstream) of Sand Run Road (see **Sheet 3**, **Figure 3** of **Appendix A**). At this location, the north bank of Sand Run is very steep with an approximate slope of 1.3:1, while the south bank has active erosion and areas of bare soil. Summit Metro Parks frequently replaces the rock protection along the channel bank at this location following rain events, in order to protect Sand Run Parkway. The project will install rock vanes on Sand Run to reduce the stress on the channel banks from the stream flow and install supplemental rock protection on the banks.

This solution will provide significant benefits for both bank protection and aquatic habitat. The proposed rock vanes will work to modify stream flows, providing a variety of flow conditions and microhabitats for fish, ranging from scour channels and pools to slower backwater refuges. The rock used for the vanes and bank protection will provide substrate for colonization by macroinvertebrates and provide benthic habitat for small fish. The vane structures will serve to reduce the ongoing erosion at these sites, which contributes to instream siltation and embeddedness.

Site 5 – Sand Run Parkway Protection: Site 5 is located along Sand Run beginning approximately 0.37 miles east (downstream) of Sand Run Road (see **Sheet 2**, **Figure 3** of **Appendix A**). At this location, the north bank of Sand Run has been previously repaired and is very steep with an approximate slope of 0.9:1, while the south bank appears unstable due to the steep slope and visible slips. Summit Metro Parks frequently replaces the rock protection along the channel bank at this location following rain events, in order to protect Sand Run Parkway. The scope of work at Site 5 is identical to that at Site 4.

Site 6 – Sand Run Parkway Protection: Site 6 is located approximately 800 feet east (downstream) of Sand Run Road. At this location, the north bank shows signs of erosion, while the south bank contains failed gabion baskets, some of which have fallen into the stream (see **Sheet 2**, **Figure 3** of **Appendix A**). Summit Metro Parks frequently replaces the rock protection along the channel bank following rain events, in order to protect Sand Run Parkway. The project will remove the failed gabion wall, add vegetated, natural stone slope protection to the stream banks, and install rock cross vanes to reduce shear stress on the banks and minimize the size and volume needed of stone slope protection. The in-stream structures will develop additional pools that, along with bank vegetation, will improve aquatic habitat.

Site 7 – Trail Protection: Site 7 is located along Sand Run approximately 480 feet west (upstream) of Sand Run Road (see **Sheet 1**, **Figure 3** of **Appendix A**). At this location, a large mid-channel bar has formed and is focusing stream flow along the south bank, which is now showing signs of erosion with several fallen trees and slides and is jeopardizing a nearby trail. The project will realign the stream channel using natural channel design techniques and stabilize the slope using natural stone and native vegetation. A pool will be constructed in the meander portion of the channel to enhance aquatic habitat. Natural stone fill will be added along the left descending bank downstream of the meander for additional bank protection.

This solution provides significant benefits for both bank protection and aquatic habitat. The proposed channel realignment will improve instream habitat and reduce ongoing erosion, which contributes to instream siltation and embeddedness. The proposed vegetated rock slope protection will provide canopy cover to the stream, providing shade to control instream temperatures, and supply leaf litter and woody debris to the stream, which is an integral component to the aquatic food web. Moreover, the rock placed will provide substrate for colonization by macroinvertebrates and provide benthic habitat for small fish.

Site 8 – Trail Protection: Site 8 is located along the unnamed tributary to Sand Run approximately 600 feet west (upstream) of Sand Run Road (see **Sheet 1**, **Figure 3** of **Appendix A**). At this location, gabion baskets on both sides of the stream bank and in the channel bed have failed with wire mesh remaining in the channel bed and on the banks. A nearby trail is jeopardized by these failing stream banks. The project will realign the stream channel to the south, providing a meandering channel, and regrade the north bank between the channel and the adjacent recreational trail. Rock sills will be installed along the realigned channel for vertical grade control with pools constructed along the meanders. The channel banks will be stabilized with grass and a permanent turf reinforcing mat for shear stress resistance.

This solution will provide ecological enhancement through the meandering channel and pools. The newly created meanders will increase the morphological and flow diversity in the stream channel, providing improved habitat for aquatic macroinvertebrates and fish.

Site 9 and Site 10 – Sand Run Parkway and Trail Protection: Sites 9 and 10 are located adjacent to Culvert 41 on the Unnamed Tributary to Sand Run approximately 0.25 miles west of Sand Run Road. These sites are being stabilized as part of emergency repair work already underway on

Culvert 41 and are discussed further in **Section 4 Cumulative Impacts**. This work is funded by the Clean Ohio Green Space Conservation Program but is not part of the local match for the FEMA Hazard Mitigation Grant Program funded actions. As such, they are not included in the schematic plans, nor are they included in Figures provided in the appendices.

Site 11 – Sand Run Parkway Protection: Site 11 is located immediately east (downstream) of Culvert 44 on the unnamed tributary to Sand Run (see **Sheet 1**, **Figure 3** of **Appendix A**). At this location, a boulder lined stilling basin is present on the channel that has been damaged by prior stream flow. To address this, and protect Sandy Run Parkway, the project will install natural stone to armor the toe of slope on the right bank and regrade the upper portion of the slope to a 2:1 grade.

Site 12 – Residential Home Protection: Site 12 is located approximately 400 feet west (upstream) of Culvert 44 on the unnamed tributary to Sand Run (see **Sheet 1**, **Figure 3** of **Appendix A**). At this location, the embankment on the south side of the channel is eroding and appears to threaten a residential structure at the top of the 35-foot high embankment. The project will place two layers of natural stone as rock toe protection. The first layer will stabilize the bank, while the second layer will launch and fill any scour areas that form along the toe of slope.

Site 13 – Sand Run Parkway and Trail Protection: Site 13 is located approximately 600 feet east (downstream) of Revere Road on the unnamed tributary to Sand Run (see **Sheet 1**, **Figure 3** of **Appendix A**). At this location, the stream channel is lined with walls built from gabion baskets. Over time, the toe of the baskets has failed with associated loss of support stone, jeopardizing the stability of Sand Run Parkway and an adjacent trail. The confined nature of the channel at this location does not provide adequate room to construct a meandering channel or to regrade the slopes. In addition, the channel is too narrow to install in-stream grade control features (i.e. vanes or sills). Grout will be pumped into the void space along the gabion foundation. Stone shall be installed in the channel along the wall toe for added scour protection.

Site 14 – Trail and Parking Lot Protection: Site 14 is located approximately 200 feet east (downstream) of Revere Road on the unnamed tributary to Sand Run near Revere Road (see **Sheet 1**, **Figure 3** of **Appendix A**). Conditions at this site are similar to Site 13. At this location, the project will remove the gabions and replace them with a precast stackable concrete block retaining wall, in order to protect a trail and nearby parking lot.

Site 15 – Park Service Center Protection: Site 15 is located along Sand Run at the Summit Metro Parks Service Center between the bridge carrying the drive to the Mingo Lodge and the Cuyahoga Valley Scenic Railroad bridge (see **Sheet 4**, **Figure 3** of **Appendix A**). The south channel bank along the Service Center shows signs of erosion that over time could threaten the Service Center infrastructure. Significant erosion exists along the outer channel banks at sharp meanders in the stream alignment. Summit Metro Parks frequently places rock protection along the channel bank at this location. The project will install rock vanes on Sand Run to reduce the stress

on the channel banks from the stream flow and direct flow through the sharp meanders in the stream alignment. Supplemental rock protection will be installed on the banks.

This solution will provide significant benefits for both bank protection and aquatic habitat and will protect the Park Service Center infrastructure. The proposed rock vanes will work to modify stream flows, providing a variety of flow conditions and microhabitats for fish, ranging from scour channels and pools to slower backwater refuges. The rock used for the vanes and bank protection will provide substrate for colonization by macroinvertebrates and provide benthic habitat for small fish. The vane structures will serve to reduce the ongoing erosion at this site, which contributes to instream siltation and embeddedness.

2.2.2 Culvert Improvements

The second component of the Proposed Action Alternative would improve 9 culvert sites along Sand Run Parkway (see **Figure 3** of **Appendix A**). Improvements to these existing culverts will address deficiencies in hydraulic capacity and physical condition. All culvert trenches will be backfilled using controlled density fill to provide additional stability for the roadway and to minimize the introduction of lime into the receiving channel. Culvert outfall scour protection will consist of natural stone materials provided from local vendors.

Culvert 19: Culvert 19 is a 24-inch high-density polyethylene (HDPE) pipe that carries a minor unnamed tributary to Sand Run under Sand Run Parkway approximately 225 feet west of the drive that leads to the Mingo Lodge (see **Sheet 4**, **Figure 3** of **Appendix A**). Culvert 19 serves a drainage area of 23.8 acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. Additionally, the culvert currently has a reduced inlet opening due to the accumulation of debris and sediment. This reduces the conveyance capacity of the culvert and leads to frequent roadway overtopping. The culvert will be replaced with a five-foot by three-foot box culvert with Class III stone at the outlet for scour protection.

Culvert 21: Culvert 21 is an 18-inch corrugated metal pipe (CMP) that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 550 feet west of the drive that leads to the Mingo Lodge (see **Sheet 4**, **Figure 3** of **Appendix A**). Culvert 21 serves a drainage area of 9.2-acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. The culvert will be replaced with a four-foot by two-foot box culvert with Class III stone at the outlet for scour protection.

Culvert 26: Culvert 26 is a 36-inch CMP that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.51 miles west of the drive that leads to the Mingo Lodge (see **Sheet 3**, **Figure 3** of **Appendix A**). The existing metal material of Culvert 26 has corroded over time. The culvert will be replaced with an in kind (36-inch CMP) structure with Class VII stone at the outlet for scour protection.

Culvert 29: Culvert 29 is a 12-inch CMP that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.64 miles west of the drive that leads to the Mingo Lodge (see **Sheet 3**, **Figure 3** of **Appendix A**). Culvert 29 serves a drainage area of 8.3-acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. The culvert will be replaced with a 24-inch high-density polyethylene (HDPE) pipe with Class III stone at the outlet for scour protection.

Culvert 30: Culvert 30 is a 30-inch CMP that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.46 miles east of Sand Run Road (see **Sheet 2**, **Figure 3** of **Appendix A**). Culvert 30 serves a drainage area of 41.0 acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. Additionally, the stacked stone headwall for Culvert 30 is failing. The culvert will be replaced with a 54-inch reinforced concrete pipe (RCP) structure with Class VII stone at the outlet for scour protection.

Culvert 32: Culvert 32 is a 21-inch CMP that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.36 miles east of Sand Run Road (see **Sheet 2**, **Figure 3** of **Appendix A**). Culvert 32 serves a drainage area of 5.9 acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. The culvert will be replaced with a 24-inch HDPE smooth wall pipe with Class VII stone at the outlet for scour protection.

Culvert 34: Culvert 34 is a 36-inch HDPE pipe that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.22 miles east of Sand Run Road (see **Sheet 2**, **Figure 3** of **Appendix A**). Culvert 34 serves a drainage area of 14.8 acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. The hydraulic deficiency results from a reduced inlet opening due to the accumulation of debris and sediment rather than the culvert diameter. The project will replace the headwall of the existing culvert and provide Class VII stone at the outlet for scour protection.

Culvert 37: Culvert 37 is a 36-inch HDPE pipe that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 300 feet east of Sand Run Road (see **Sheet 2**, **Figure 3** of **Appendix A**). Culvert 37 serves a drainage area of 66.4 acres and is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. The stacked stone at the inlet for Culvert 37 has collapsed and crushed the pipe, leading to high water overtopping the roadway. The culvert will be replaced with a 60-inch CMP structure.

Culvert 41: Culvert 41 is a 48-inch CMP that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.25 miles west of Sand Run Road. Culvert 41 is being replaced as part of an emergency repair project and includes stabilization of Sites 9 and 10, previously noted. This work is already underway and is discussed further in **Section 4 Cumulative Impacts**. This work is funded by the Clean Ohio Green Space Conservation Program but is not part of the local match for the FEMA Hazard Mitigation Grant Program funded actions.

Culvert 44: Culvert 44 is a 36-inch RCP that carries a minor unnamed tributary to Sand Run under Sand Run Parkway located approximately 0.36 miles west of Sand Run Road (see **Sheet 1**, **Figure 3** of **Appendix A**). Culvert 44 serves a drainage area of 0.5 miles (326-acres). This culvert currently provides for adequate flow for up to the ten-year rainfall event due to natural storage of stormwater runoff upstream of the Sand Run Parkway embankment which is hydraulically deficient to satisfy the Summit Metro Parks hydraulic conveyance level of service requirements. The culvert will be replaced with a 14-foot by four-foot three-sided box culvert. Improvements to the upstream storage will be completed as part of the Site 11 project.

2.2.3 Aquatic Organism Passage (AOP) Improvement

The third component of the Proposed Action (AOP Improvement) will address an abrupt stream grade elevation change at one site located immediately downstream of the Cuyahoga Scenic Valley Railroad bridge, north of the park's Service Center (see **Sheet 4**, **Figure 3** of **Appendix A**). This severe grade change creates a barrier to aquatic organisms from Sand Run to the downstream confluence with the Cuyahoga River. At this location there is a five-foot channel drop measured from the edge of the railroad bridge down to the bottom of a scour pool. The project will construct a custom fish passage that will function similar to a fish ladder, with large stones carefully placed to create a gradually stepped incline, to facilitate movement of aquatic organisms. There will be no modification to the railroad structure.

2.3 Alternative 3 – Stream Stabilization Only

The third alternative would have the same scope of work as the Stream Stabilization component of the Proposed Action Alternative but would not include the Culvert Improvement component (described in **Section 2.2.2**) or the AOP Improvement component (described in **Section 2.2.3**).

Stream stabilization would be completed at the 13 sites, as described in **Section 2.2.1**, to protect Sand Run Parkway and the City of Akron sanitary sewer line as well as one residential structure, park trails, cabins, parking areas, and a portion of the park service center. Stream stabilization includes restoration using natural channel design techniques, bank stabilization using slope regrading with vegetated stone, limited use of retaining walls where possible, and other best practices to improve aquatic habitat. As part of this alternative, existing areas of erosion along Sand Run and the unnamed tributary will be addressed.

Under this alternative no improvements to the nine existing undersized culverts will be conducted, and these structures will continue to fail to meet the design criteria for the 25-year design storm event. In addition, the abrupt stream grade elevation change immediately downstream of the Cuyahoga Scenic Valley Railroad bridge will remain a barrier to aquatic organism passage.

2.4 Alternatives Considered and Eliminated from Further Consideration

Two conceptual alternatives described below were considered as part of internal discussions within the Summit Metro Parks staff but were dismissed from further analysis.

- **Close Sand Run Parkway.** Under this alternative, the roadway would be proactively closed to through traffic. An average 4,400 vehicles per day would be required to permanently use other local roadways, such as Market Street or Smith Road, increasing congestion on these roadways. For park users, access to the interior portion of a large portion of Sand Run Metro Park would be accessible on foot only. As a major sanitary sewer line owned by the City of Akron runs alongside Sand Run Parkway, closing the road would also limit access to portions of the utility for maintenance purposes. Presumably, as the road would be closed to traffic, erosion and flooding would continue without the rigorous maintenance that currently occurs and the pavement would degrade and become unstable. Destabilization would threaten the integrity of the sanitary sewer line that runs alongside the roadway. In addition, continued erosion on Sand Run and the unnamed tributary would not address the risk to one residential structure as well as park trails, cabins, parking areas, and a portion of the park service center that are located adjacent to these shifting waterways. As such, this alternative was eliminated because it does not protect community resources and infrastructure, would lead to major disruption for local motorists and park visitors, and would restrict the City of Akron's ability to maintain their sanitary sewer infrastructure.
- **Relocate Sand Run Parkway**. Under this alternative, the approximately 2 miles of existing roadway would be relocated and moved out of the Sand Run floodplain. This would be accomplished by constructing a new roadway on a new alignment, along the hillslope above the existing roadway location (outside the floodplain). In addition, the City of Akron's sanitary sewer would likely need to be relocated. Elevating the roadway would likely disturb over 20 acres of mature forest, impacting wildlife, potential threatened and endangered species, bat roosting habitat, numerous streams and drainageways, and potential cultural resources that may be present beyond the existing roadway footprint. Relocating the roadway could also impact park amenities, including trails, parking lots, and lodges, depending on the exact location of the new roadway, and would limit the park's availability to the public for the duration of construction. This alternative was dismissed because the cost to engineer and construct the new roadway and relocate the sanitary sewer line is not financially feasible, and due to the substantial impacts to natural resources within the park that would occur as a result of the roadway relocation.

3 AFFECTED ENVIRONMENT AND CONSEQUENCES

This section describes the natural and human environment potentially affected by the Sand Run stabilization and infrastructure improvement alternatives, evaluates potential impacts, and recommends measures to avoid or reduce those impacts. When possible, quantitative information is provided to establish potential impacts, and the potential impacts are evaluated qualitatively based on the criteria listed in **Table 3-1**. The "study area" generally includes the impact area required for the action and access and staging areas needed to complete the proposed action. If the study area for a particular resource category is different from the project area, the differences are described in the appropriate subsection.

Preliminary schematic plans showing the estimated most extensive project footprint for each improvement location are included in **Appendix B**. As these estimates are based on the greatest possible impact limits, in most cases the impact areas will be reduced in size during final design.

Table 3-1 Evaluation Criteria for Potential Impacts

Impact Scale	Criteria
None/Negligible	The resource area would not be affected, or changes or benefits would be either undetectable or, if detected, would have effects that would be slight and local. Impacts would be well below regulatory standards, as applicable.
Minor	Changes to the resource would be measurable, although the changes would be small and localized. Impacts or benefits would be within or below regulatory standards, as applicable. Mitigation measures would reduce any potential adverse effects.
Moderate	Changes to the resource would be measurable and have either localized or regional scale impacts/benefits. Impacts would be within or below regulatory standards, but historical conditions would be altered on a short-term basis. Mitigation measures would be necessary, and the measures would reduce any potential adverse effects.
Major	Changes would be readily measurable and would have substantial consequences on a local or regional level. Impacts would exceed regulatory standards. Mitigation measures to offset the adverse effects would be required to reduce impacts, but long-term changes to the resource would be expected.

3.1 Description of Affected Environment

Sand Run Metro Park, which hosts over 1.7 million visitors each year, features miles of hiking, biking, and jogging trails, two lodges, picnic shelters, soccer fields, and provides activities such as fishing, camping, sledding, and ice skating. The project area includes roughly two miles of Sand Run Parkway from Revere Road to just east of the Valley Railway Historic District bridge that crosses Sand Run. The work, then, will be conducted in an environment comprised of both natural areas and maintained infrastructure including the parkway itself, various trails, lodges,

picnic areas, and associated amenities. In addition to the parkway and its right-of-way, work will be done along sections of the nearby Mingo Trail and in sections of the adjacent Sand Run Stream and unnamed tributaries as required to complete the bank stabilization and culvert work. The project will also modify an existing five-foot channel drop to the bottom of a scour pool, replacing it with a custom fish passage.

3.2 Preliminary Screening of Assessment Categories

Based on a preliminary screening of resources and the project's geographic location, the following resources do not require a detailed assessment.

- ***Coastal Barrier Resources* and *Coastal Zone Management.*** The Coastal Barrier Resources Act and the Coastal Zone Management Act are not applicable because the project is not within or near a coastal area.
- ***Prime and Unique Farmland.*** The Farmland Policy Protection Act is not applicable because less than two percent of the soils in the project area are classified by the Natural Resources Conservation Service (NRCS) as prime farmland, unique farmland, or farmland of statewide importance (USDA 2020). The project is also located within the census-designated urbanized areas of Akron and Fairlawn, Ohio (U.S. Census Bureau 2020).
- ***Seismic Risks.*** Executive Order (EO) 12699, Seismic Safety of Federal and Federally Assisted or Regulated New Building Construction does not apply because there is low seismic risk in the project area based on seismic hazard maps developed by the U.S. Geological Survey (USGS, 2018).
- ***Sole Source Aquifers.*** There are no sole-source aquifers or public water systems regulated by the Safe Drinking Water Act of 1974 in the vicinity of the project area (Ohio EPA 2020). As such, this regulation does not apply to the project.
- ***Wild and Scenic Rivers.*** The Wild and Scenic Rivers Act, 16 U.S.C. § 1271 et seq., is not applicable because there are no federally designated wild and scenic rivers in the project area based on a review of the National Wild and Scenic Rivers System website maintained by the National Park Service (NPS 2020). The closest federally designated Wild or Scenic River is Little Beaver Creek, located in Columbiana County, approximately 57 miles southeast of the project area.

3.3 Physical Environment

3.3.1 Geology, Soils, and Topography

This section provides an analysis of geology, soils, and topography. Bedrock geology was characterized using the Bedrock Geologic Map of Ohio (Ohio Division of Geological Survey, 2006). Underlying bedrock in the project area consists of Ohio Shale. The bedrock formed during the Upper Devonian period (360 to 440 million years ago).

The project area consists of six different soil types as listed in **Table 3-2,** identified using the U.S. Department of Agriculture (USDA) NRCS Web Soil Survey (USDA 2019). The NRCS reports that

the majority of the project area (95%) is composed of Chili gravelly loam soils (38%), Cardinal-Mentor silt loams (39%), and Holly silt loam soils (18%) (See **Figure 4** of **Appendix A**). Per the subsurface investigation completed as part of the Preliminary Engineering Report (EMH&T, 2018), the subsoils in the project area consist of glacial drift with various layers of silt, clay, and sand, which are easily erodible.

Table 3-2 Soil Types within the Project Area

Soil Type	Percent of Project Area
CoC2—Chili gravelly loam, 6 to 12 percent slopes, moderately eroded	38%
CrF—Cardinal-Mentor silt loams, 25 to 75 percent slopes	39%
CuB—Chili-Urban land complex, undulating	3%
Hy—Holly silt loam, alkaline	18%
OtF—Oshtemo-Glenford complex, 25 to 75 percent slopes	1%
Sb—Sebring silt loam, 0 to 2 percent slopes	2%

Topography in the surrounding area is steeply sloping with elevations ranging from 760 to 970 feet (USGS, 1963). Due to development in the area over the past century, much of the Sand Run watershed now consists of residential lawns and impervious surfaces. These types of land uses increase surface runoff which, in combination with the steep terrain and erodible soils, has led to active erosion along the banks and stream channels within the Sand Run watershed, and slope failures on adjacent lands.

Alternative 1 – No Action

Under the No Action alternative, the proposed stream stabilization and culvert improvements along Sand Run Parkway would not be performed, and there would be no short-term or long-term effect on geology.

The No Action alternative would cause moderate long-term impacts to the soils and topography as a result of continued stream channel and stream bank erosion. Continued bank destabilization and soil loss along Sand Run, the main unnamed tributary to Sand Run, and smaller tributaries would lead to unchecked stream channel migration that would permanently change the local topography over time. These changes would further undermine Sand Run Parkway, thereby impacting the integrity of the roadway and adjacent utility infrastructure and would eventually lead to the failure of this infrastructure.

Alternative 2 – Proposed Action

Stream Stabilization and Culvert Replacement activities would have minor short-term impacts on soils and topography resulting from excavation, regrading, and installation of culverts, rock

vanes, and bank protection features. Installation of the aquatic organism passage improvement would have a minor short-term impact on soils associated with construction and would have a minor long-term impact on topography resulting from the placement of stone to create a custom fish ladder.

There would be no negative, long-term impacts to geology, soils, and topography and some moderate long-term benefits associated with the Proposed Action alternative. The Stream Stabilization actions would provide long-term benefits to soils and topography in the project area by implementing measures that would limit soil erosion and improve stream stability. The native plantings associated with proposed bank protection would further stabilize soils. The Culvert Improvements would provide long-term protection of the soils supporting the roadway and sanitary sewer line through reduced flooding and decreased hydraulic pressure on the roadway embankment.

Alternative 3 - Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts associated with construction similar to those described under the Proposed Action. Stream Stabilization would provide moderate long-term benefits by minimizing soil erosion and stabilizing the stream geomorphology. However, flooding along Sand Run Parkway would still occur as water will continue to pool upstream of undersized culverts, reducing soil stability along the roadway embankment and sanitary sewer line.

3.3.2 Water Resources and Water Quality

Water resources include surface water, groundwater, stormwater, and drinking water (wetlands are evaluated in **Section 3.4.2**). The Clean Water Act (CWA) of 1977, 33 U.S.C. § 1251 et seq., regulates the discharge of pollutants (including fill material) into water, with various sections falling under the jurisdiction of United State Army Corps of Engineers (USACE) and the United States Environmental Protection Agency (USEPA). Section 404 of the CWA establishes the USACE permit requirements for discharging dredged or fill materials into waters of the United States and traditional navigable waterways. USACE regulation of activities within navigable waters is also authorized under the 1899 Rivers and Harbors Act. Under the National Pollution Discharge Elimination System (NPDES) permit program, USEPA regulates both point and nonpoint pollutant sources, including stormwater runoff. Activities in waters of the state are also regulated under Ohio law (Chapter 6111 Water Pollution Control of the Ohio Revised Code [ORC]). In Ohio, non-jurisdictional ephemeral streams are considered waters of the state and the State of Ohio regulates impacts to streams under ORC Sections 6111.021 and 6111.03(J)(1). See **Section 6.1** for additional information regarding permits for stream impacts.

The project area is located along the Sand Run stream and a major unnamed tributary that roughly parallels Sand Run Parkway. Numerous smaller tributaries drain to these streams along the length of the project area. Sand Run reaches a confluence with the Cuyahoga River, a Traditional Navigable Water, approximately 0.2 river miles downstream of the project area. The

3.53 square mile watershed is largely suburban residential, with the exception of the Sand Run Metro Park forested areas (USGS 2020). The streams in the project area carry stormwater runoff from the surrounding watershed to the Cuyahoga River. There are no sole source aquifers or drinking water source protection areas within or adjacent to the project area (Ohio EPA 2020). Surface waters in the project area are shown in **Figure 5** of **Appendix A**.

An Ohio EPA evaluation of Sand Run in 1999 indicated that warmwater habitat was the most appropriate designation for the stream's potential. However, poor scores in measuring both fish and macroinvertebrate assemblages indicated that the stream was in non-attainment of the warmwater habitat designation. Ohio EPA also reported that flashy stream flows severely eroded the banks and substrates were extensively embedded; as such, the habitat was only marginally suited to warmwater habitat faunas (Ohio EPA 1999). Environmental scientists from EMH&T evaluated the streams within the project area in 2013 as part of data collection associated with development of the Preliminary Engineering Report (EMH&T, 2018). The 2013 ecological stream assessment of Sand Run is in agreement with the results of Ohio EPA's 1999 study. EMH&T's assessment of the unnamed tributary to Sand Run showed significant degradation and determined that effects of channelization on this reach were extreme.

The project is located within the Akron Water Supply water system, which has a service area of 125 square miles and serves nearly 300,000 customers. The drinking water supply is drawn from three reservoirs that take water from the upper Cuyahoga River, upstream of the project area. Water is stored and released from the Wendell R. LaDue Reservoir and the East Branch Reservoir, both in Geauga County. These reservoirs supplement Lake Rockwell, located in Franklin Township, Portage County (Akron Water Supply Bureau 2019). The City of Cleveland Division of Water serves 70 communities throughout Northeast Ohio downstream of the project area. The source for drinking water is Lake Erie, where surface water is drawn from four intakes located offshore to protect water from possible contamination (City of Cleveland 2020).

Alternative 1 – No Action

Under the No Action alternative, erosion along Sand Run and its tributaries would continue, and Sand Run Parkway would continue to be flooded due to undersized culverts. Continued soil erosion would cause moderate long-term impacts on water quality as a result of sedimentation into Sand Run and the downstream Cuyahoga River. Flooding at undersized culverts would continue to overtop roadways that contain pollutants which degrade water quality. Possible failure of the roadway and resulting soil disturbance could cause soil and construction debris to wash downstream, further impacting water quality. Failure of the roadway embankment would also threaten the integrity of the public sanitary sewer line that runs parallel to the road. Failure of the sanitary sewer would cause major, long-term adverse impacts on water quality in the local watershed. The No Action Alternative would have no impact on groundwater or drinking water resources.

Alternative 2 – Proposed Action

The Proposed Action would have minor short-term adverse impacts on water quality associated with construction activities and increased risk of erosion. During construction, exposed soil is highly vulnerable to erosion by wind and water. Eroded soil degrades water resources by reducing water quality and causing the siltation of habitat for aquatic species. Clearing and grading during construction would cause the temporary loss of vegetation. For all in stream work, construction means and methods will be defined by the contractor but will likely be completed using temporary aggregate check dams and water pumps to divert clean water around the impact area.

The Proposed Action would have major, long-term benefits on surface water resources and water quality. The Stream Stabilization and Culvert Improvements would substantially improve water quality in the Sand Run watershed and the downstream Cuyahoga River watershed, by reducing erosion and sedimentation and by decreasing the frequency of roadway pollutants entering the streams during flood events. The Proposed Action would have no impact on groundwater or drinking water resources.

The Proposed Action would require permits under the CWA and work that occurs below the ordinary high water mark would be subject to approval by USACE and the Ohio EPA. Stream impacts were evaluated based on the capacity for each action to be within the regulatory thresholds established for General Permit types (e.g. Nationwide Permit from the USACE or General Permit from Ohio EPA). Estimated impacts to open channel streams in the project area are summarized in **Table 3-3**. Existing culvert lengths are not included in the estimated impact lengths, as these lengths typically are not included in fill quantity calculations for CWA permits. As these estimates are based on the most extensive possible impact limits, in most cases the impact areas will be reduced in size during final design to minimize stream impacts. Preliminary schematic plans showing the estimated maximum project footprint for each improvement location are included in **Appendix B**.

Stream impacts will be permitted on a site-specific basis. Most are expected to meet the requirements of the Nationwide Permit Program and Ohio EPA's General Permit. Other waterway permitting requirements will be confirmed during detailed design. Work on sites 7 and 12 has been authorized by the USACE under Nationwide Permit 13, Bank Stabilization, with a Director's Authorization issued by the Ohio EPA (ID No. 196514, 01/02/2020). Work on sites 1, 8, 11, 13, 14, and Culvert 41, has been authorized by the USACE under Nationwide Permit 3, Maintenance. See **Appendix C** for correspondence associated with these permit approvals. CWA permit responsibilities and compensatory stream mitigation requirements are detailed in **Section 6, Mitigation Measures and Permits**.

Table 3-3 Estimated Stream Impacts

Location	Impact Type	Estimated Maximum Stream Impact (Linear Feet)
Site 1	Install sheet pile wall	225
Site 2	Channel realignment, install rock vanes	430
Site 3	Install rock vanes	1,275
Site 4	Install rock vanes, armor bank	
Site 5	Install rock vanes, armor bank	320
Site 6	Remove gabions, install rock vanes	305
Site 7	Channel realignment	470
Site 8	Channel realignment, install rock sills	
Site 11	Armor bank	100
Site 12	Armor bank	430
Site 13	Grout gabion voids	300
Site 14	Remove gabions, install concrete retaining wall	195
Site 15	Install rock vanes	660
Culvert 19	Replace culvert	119
Culvert 21	Replace culvert	82
Culvert 26	Replace culvert	28
Culvert 29	Replace culvert	0
Culvert 30	Replace culvert	125
Culvert 32	Replace culvert	100
Culvert 34	Replace headwall	45
Culvert 37	Replace culvert	115
Culvert 44	Replace culvert	70
AOP	Install custom fish ladder	150
	Proposed Action Estimated Impacts	**5,554**

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts associated with construction activities and increased risk of erosion similar to those described under the Proposed Action. Estimated stream impacts for this alternative are 4,485 linear feet in total (Refer to **Table 3-2**, Sites 1-15). Impacts to streams would require waterway permits from the USACE (for intermittent and perennial streams) and the Ohio EPA (for ephemeral streams). Impacts will be permitted on a site-specific basis and should fall within the maximum thresholds of the Nationwide Permit Program and Ohio EPA's General Permit; however, waterway

permitting requirements should be evaluated further during detailed design. Compensatory mitigation for stream impacts may be required by the regulatory agencies.

There would be moderate long-term benefits to water quality due to reduced erosion and sedimentation. However, flooding at undersized culverts would continue to overtop roadways that contain pollutants which degrade water quality, causing minor long-term impacts. Possible failure of the roadway and resulting soil disturbance could cause soil and construction debris to wash downstream, further impacting water quality. Failure of the roadway embankment would also threaten the integrity of the public sanitary sewer line that runs parallel to the road. Failure of the sanitary sewer line would cause major, long-term adverse impacts on water quality in Sand Run and the Cuyahoga River downstream. The Stream Stabilization Only alternative would have no impact on groundwater or drinking water resources.

3.3.3 Floodplain Management (Executive Order 11988)

Executive Order (EO) 11988, Floodplain Management, requires federal agencies to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 C.F.R Part 9. The eight-step decision-making process to ensure compliance with EO 11988 is provided in **Appendix E**.

All of the project areas along Sand Run and the unnamed tributary to Sand Run are at least partly within Zone A, which is the Special Flood Hazard Area (SFHA) subject to inundation by the 100-year flood, but for which no base flood elevations have been determined. Portions of Sand Run Parkway, which will be used for construction staging are also within Zone A as shown on the Flood Insurance Rate Map found in **Figure 6** of **Appendix A**.

Coordination with the local floodplain administrator would be required to ensure compliance with local floodplain ordinances. All necessary floodplain permitting will be the responsibility of Summit County Metro Parks, and any necessary floodplain permits will be obtained prior to construction. Floodplain permit responsibilities and mitigation requirements are detailed in **Section 6, Mitigation Measures and Permits**.

Alternative 1 – No Action

Under the No Action alternative, there would be no construction; therefore, there would be no direct modification of the floodplain and no short-term impacts. However, there would be moderate long-term impacts to the floodplain from continued erosion, bank destabilization, and road closures due to flooding.

Alternative 2 – Proposed Action

The Proposed Action would result in minor short-term impacts on floodplains as a result of ground disturbance due to excavation and the removal of vegetation in the mapped floodplain.

A preliminary hydraulic analysis was performed as part of the Preliminary Engineering Report (EMH&T, 2018). Hydrologic and hydraulic models were developed for Sand Run, unnamed tributaries to Sand Run, and select culverts along Sand Run Parkway. The analysis provided information on stream flow rates, water surface elevations, velocities, and channel shear stress for the streams, as well as a current level of service (i.e. ability to convey hydraulic flows) for the culverts. The undersized culverts causing flooding and associated problems are recommended in the Preliminary Engineering Report to be replaced as part of the Proposed Action. The level of service (i.e. ability to convey hydraulic flows) for the new culverts is for the 25-year design storm based on ODOT drainage design criteria.

Based on hydraulic analyses performed, the Proposed Action, including streambank stabilization, culvert improvements, and the aquatic organism passage improvement, would have no adverse impacts on base flood elevations or floodplain functions. The Proposed Action will comply with the floodplain permit requirements of the local community having jurisdiction. Overall, the Proposed Action would provide major, long-term benefits to floodplain management, by reducing both the flooding caused by undersized culverts and the sedimentation from unstable streambanks, which leads to the constant maintenance of streams and culverts within the floodplain.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts on floodplains as a result of ground disturbance due to excavation and the removal of vegetation in the mapped floodplain. There would be moderate long-term benefits resulting from reduced erosion and a stabile stream channel. However, there would be moderate long-term impacts to the floodplain from flooding associated with undersized culverts in the project area. Flood waters overtopping the roadway would continue to cause road closures and to threaten the integrity of the roadway embankment and the sanitary sewer line. Maintenance of the roadway within the floodplain due to undersized culverts and associated flooding would continue to require constant maintenance to streams and culverts within the floodplain.

3.3.4 Air Quality

The Clean Air Act (CAA), 42 U.S.C. § 7401 et seq., requires the USEPA to set National Ambient Air Quality Standards (NAAQS) that define the concentrations of air pollutants that may not be exceeded within a given period to protect human health (primary standards) and welfare (secondary standards). Current criteria pollutants are carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), lead (Pb), particulate matter (PM), and sulfur dioxide (SO_2).

Federally funded actions in nonattainment and maintenance areas are subject to USEPA conformity regulations, 40 C.F.R. Parts 51 and 93. The air conformity analysis process ensures that emissions of air pollutants from planned federally funded activities would not affect the state's ability to achieve the CAA goal of meeting the NAAQS. Section 176(c) of the CAA requires that federally funded projects must not cause any violations of the NAAQS, increase the

frequency or severity of NAAQS violations, or delay timely attainment of the NAAQS or any interim milestone. The emissions from construction activities are subject to air conformity review.

Under the general conformity regulations, a determination for federal actions is required for each criteria pollutant or precursor in nonattainment or maintenance areas where the action's direct and indirect emissions have the potential to emit one or more of the six criteria pollutants at rates equal to or exceeding the prescribed *de minimis* rates for that pollutant. The prescribed annual rates are 50 tons of volatile organic compounds and 100 tons of nitrogen oxides (NO_X) (ozone precursors), and 100 tons of PM2.5, SO_2, or NO_X (PM2.5 and precursors).

An area is classified as in nonattainment when it does not meet NAAQS standards. The entire state of Ohio is in attainment for CO, NO_2, Pb, PM10, and 24-hour PM2.5. Summit County does not currently meet attainment standards for O_3 (USEPA 2018).

Alternative 1 – No Action

Construction activities would not occur under the No Action alternative. However, continued maintenance resulting from erosion and flooding would likely cause a minor long-term increase in localized emissions.

Alternative 2 – Proposed Action

The Proposed Action would have minor short-term impacts on air quality owing to the use of construction equipment with diesel and gasoline engines. Additionally, exposed soil could temporarily increase airborne particulate matter into the project area. Emissions of some pollutants from construction equipment, including CO, VOCs, NO_2, O_3, and PM, would be temporary and localized, and only minor impacts to air quality in the project area would occur.

Short-term air quality impacts would be offset by the anticipated long-term reductions in emissions that would occur when the Proposed Action improvements reduce the ongoing use of construction vehicles to conduct maintenance activities in the project area.

The Proposed Action would have no long-term adverse impacts on air quality and an air permit would not be required.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts on air quality associated with construction. However, continued maintenance resulting from flooding would likely cause a minor long-term increase in localized emissions.

3.4 Biological Environment

3.4.1 Terrestrial and Aquatic Environment

Terrestrial and aquatic environments include the native and invasive vegetation, fish and wildlife, and their habitats that can be found in the project areas. Terrestrial and aquatic environments in the project area were evaluated based on findings from the field survey completed by EMH&T in December 2013 as part of the Preliminary Engineering Report (EMH&T, 2018). Additionally, wetland areas within the park were delineated by Summit Metro Park's staff in 2006 and updated in 2013 (wetland impacts are discussed in **Section 3.4.2**). The park boundaries, streams, and wetlands are shown in **Figure 5** of **Appendix A**.

Terrestrial habitat in the project area is comprised primarily of mature forest with the exceptions of walking paths, parking areas, Sand Run Parkway, and park maintenance buildings/offices. The aquatic habitat includes Sand Run, a substantial unnamed tributary to Sand Run, many ephemeral and intermittent stream channels, and many adjacent seeps and streamside wetlands. As noted in **Section 3.3.2,** based on the Ohio EPA's assessment of Sand Run, the habitat was only marginally suited to warmwater habitat faunas (Ohio EPA 1999). The 2013 wetland assessments, performed using the Ohio Rapid Assessment Method Version 5, indicate that the majority of wetlands in the park are within the Category 2 or 3 range. Category 2 wetlands exhibit moderate quality, function, or value; Category 3 wetlands are wetlands of superior quality, function, or value.

Alternative 1 – No Action

Under the No Action alternative, there would be moderate long-term impacts on the terrestrial and aquatic environment. Continued erosion of stream banks would lead to increased sedimentation in the stream from soil erosion. Continued flooding at undersized culverts would overtop roadways and surface runoff could contain pollutants that would impact aquatic habitat. The abrupt stream grade elevation change immediately downstream of the Cuyahoga Scenic Valley Railroad bridge will remain a barrier to aquatic organism passage.

Alternative 2 – Proposed Action

Construction activities associated with the Proposed Action would cause minor short-term impacts on the terrestrial environment (i.e. soil disturbance and removal of brush and emergent vegetation) and on the aquatic environment (i.e. temporary dewatering, sedimentation in streams, and wetland fills) while work is performed. All disturbed areas will be revegetated using native species. In areas where stream banks are reinforced using natural stone, the stream bank will be revegetated using live stakes of native tree species through the stone to provide canopy cover to the stream, provide shade to control instream temperatures, and supply leaf litter and woody debris to the stream, which is an integral component to the aquatic food web.

Stream Stabilization would result in moderate long-term benefits to the terrestrial environment as stabilized stream banks will reduce the incidence of large trees falling due to eroding stream

banks. Moderate long-term benefits to the aquatic environment would occur because reduced sedimentation and the placement of rock vanes would prevent further embeddedness of the substrate and improve habitat for aquatic macroinvertebrates and other aquatic fauna. Culvert Improvements would result in moderate long-term benefits to the aquatic environment through reduced flooding and improved water quality. The AOP Improvement would provide moderate long-term benefit to the aquatic environment by removing a barrier to aquatic organism passage between the Cuyahoga River and Sand Run.

Based on the preliminary schematic plans showing the estimated most extensive project footprint possible for each improvement location **(Appendix B)**, the Proposed Action would remove approximately 11.3 acres of existing vegetation (including trees) over 23 locations, impact approximately 5,554 linear feet of stream over 22 locations, and could also result in the filling of approximately 1.125 acres of wetland over 11 locations. As these estimates are based on the most extensive possible impact limits, in most cases the impact areas will be reduced in size during final design to avoid as many trees and wetland areas as possible. Estimated impacts to forested areas are summarized in **Table 3-4** (streams are evaluated in **Section 3.3.2** and wetlands are evaluated in **Section 3.4.2**).

Table 3-4 Estimated Forested Area Impacts

Location	Forested Impact (Acres)
Site 1	0.30
Site 2	1.50
Site 3	3.90
Site 4	
Site 5	0.50
Site 6	0.65
Site 7	1.00
Site 8	
Site 11	0.13
Site 12	0.87
Site 13	0.18
Site 14	0.02
Site 15	1.10
Culvert 19	0.13
Culvert 21	0.12
Culvert 26	0.17
Culvert 29	0.06
Culvert 30	0.06

Location	Forested Impact (Acres)
Culvert 32	0.10
Culvert 34	0.10
Culvert 37	0.14
Culvert 44	0.23
AOP	0.34
Proposed Action Estimated Impact	**11.30**

Best Management Practices (BMPs) to avoid and minimize impacts to terrestrial and aquatic environments are provided in **Section 6.2.**

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have similar minor short-term impacts associated with construction as the Proposed Action. The Stream Stabilization Only alternative would remove approximately 9.85 acres of existing vegetation (including trees) over 13 locations, impact approximately 4,485 linear feet of stream over 13 locations, and could also result in the filling of approximately 0.879 acres of wetland over six locations. The moderate long-term benefits would also be similar to those associated with the Stream Stabilization component in the Proposed Action. Moderate long-term impacts would persist as the undersized culverts would continue to flood, increasing the potential for pollutants to enter the streams. The abrupt stream grade elevation change immediately downstream of the Cuyahoga Scenic Valley Railroad bridge would remain unchanged and continue to prohibit aquatic organism passage.

3.4.2 Wetlands (Executive Order 11990)

Executive Order (EO) 11990, Protection of Wetlands, requires federal agencies to take action to minimize the loss of wetlands. FEMA regulation 44 C.F.R. Part 9, *Floodplain Management and Protection of Wetlands*, sets forth the policy, procedures, and responsibilities to implement and enforce EO 11990. EO 11990 prohibits FEMA from funding activities in a wetland unless no practicable alternatives are available. The NEPA compliance process requires federal agencies to consider direct and indirect impacts on wetlands which may result from federally funded actions. The eight-step decision-making process to ensure compliance with EO 11990 is provided in **Appendix E**. Activities that disturb jurisdictional wetlands require a permit from USACE under Section 404 of the CWA of 1977 (33 U.S.C. § 1344).

USACE and USEPA define wetlands as “areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions” (40 C.F.R. § 122.2). In 2008, USEPA and the USACE, through a joint rulemaking, expanded the Clean Water Act Section 404(b)(1) Guidelines to include more comprehensive

standards for compensatory mitigation. The rule addresses the sequence for mitigating unavoidable impacts to aquatic resources that result from work authorized by permits under the Corps' Regulatory Program. Permit applicants are required to describe how they will avoid, minimize, and compensate for impacts to waters of the U.S. Compensatory mitigation for unavoidable impacts is required to replace the loss of wetland, stream, and/or other aquatic resource functions. As the wetlands in the project area are located near the eroding streams and undersized culverts, avoidance is not possible. Work limits will be constrained to the greatest extent practicable.

The Nationwide Permit 3 (Maintenance) and the Nationwide Permit 13 (Bank Stabilization) require compensatory mitigation at a minimum one-for-one ratio for all wetland losses that exceed 1⁄10-acre. Compensatory mitigation is not required under the Nationwide Permit 27 (Aquatic Habitat Restoration).

The National Wetlands Inventory (NWI) was reviewed to identify potential wetlands in the project area (USFWS 2020a). The NWI does not show any wetlands within the project area. Wetlands within the project area were delineated by Summit Metro Parks in 2006 and updated in 2013, and this information was used to determine potential wetland impacts that could occur as part of this project. All surface water features within the project area are shown in **Figure 5** of **Appendix A**. Wetlands in the project area are generally associated with streams, groundwater seeps, or poorly drained depressional areas and are presumed to be jurisdictional features.

Alternative 1 – No Action

Under the No Action alternative, there would be no project-related short- or long-term adverse impacts on the identified wetlands as construction activities would not occur.

Alternative 2 – Proposed Action

The Proposed Action would result in minor long-term impacts to 1.125 acres of wetland over 11 locations, as some wetlands would need to be filled and regraded to accommodate construction at the Stream Stabilization and Culvert Improvement sites. Construction of the AOP Improvement would not impact any known wetlands. Estimated wetland impacts are summarized in **Table 3-5**.

Table 3-5 Estimated Wetland Impacts

Location	Wetland Impact (Acres)
Site 1	0.08
Site 2	0
Site 3	0.63
Site 4	
Site 5	0.004

Location	Wetland Impact (Acres)
Site 6	0.04
Site 7	0
Site 8	
Site 11	0
Site 12	0.2
Site 13	0
Site 14	0
Site 15	0.005
Culvert 19	0
Culvert 21	0.06
Culvert 26	0
Culvert 29	0.006
Culvert 30	0
Culvert 32	0
Culvert 34	0
Culvert 37	0.08
Culvert 44	0.02
AOP	0
Proposed Action Estimated Impact	**1.125**

This loss of 1.125 acres of wetland would be a minor long-term impact. The regulatory threshold used to assess impacts to wetlands was whether the actions likely could be permitted using a type of General Permit (e.g. Nationwide Permit from the USACE or General Permit from Ohio EPA). Wetland impacts will be offset by compensatory mitigation as applicable. The need for mitigation and the amount of mitigation required will depend on how projects are grouped for construction and what type of permit is required for each activity. The permitting and mitigation strategies will be determined during final engineering design for each project. Wetland permit responsibilities and mitigation requirements are covered by the general conditions and those for soils and water resources detailed in **Section 6 Mitigation Measures and Permits**. **Section 6** also identifies BMPS that will be implemented to minimize impacts to wetlands.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would result in minor long-term impacts to 0.879 acres of adjacent wetland over six locations to accommodate construction (**Table 3-5**, Sites 1-15). Impacts to wetlands require waterway permits from the USACE (for jurisdictional wetlands) and the Ohio EPA (for isolated wetlands). Impacts will be permitted on a site-specific basis and are

anticipated to meet the thresholds of the Nationwide Permit Program and Ohio EPA's General Permit. Waterway permitting requirements will be confirmed during detailed design. Compensatory mitigation for wetland impacts may be required by the regulatory agencies.

3.4.3 Threatened and Endangered Species

Federal Listed Species

The Endangered Species Act (ESA) of 1973, 16 U.S.C. § 1531, provides a framework for the conservation of endangered and threatened species and their habitats. Federal agencies are required to ensure that actions they fund, authorize, or carry out are not likely to jeopardize the continued existence of any listed species (including plant species) or result in the destruction or adverse modification of designated critical habitats for such species. In accordance with Section 7 of the ESA, the project area was evaluated for the potential occurrences of listed threatened and endangered species.

In May 2020, via the Information for Planning and Consultation (IPaC) tool, FEMA obtained a list of federally listed species with the potential to occur in the project vicinity (USFWS Consultation reference code 03E15000-2020-SLI-1347). There was no federally designated critical habitat within the project area. The IPaC tool identified the potential for three federally listed species to occur in or near the project area:

- *Myotis sodalis* (Indiana bat) – federally endangered
- *Myotis septentrionalis* (northern long-eared bat) - federally threatened
- *Aconitum noveboracense* (northern monkshood) – federally threatened

Bat species spend winter hibernating in caves or abandoned mines. They require cool, humid conditions with stable temperatures. In summer, bats migrate to their summer habitat in wooded areas where they usually roost under loose tree bark or in cavities or crevices on dead or dying trees. During summer, males roost alone or in small groups, while females roost in larger groups of up to 100 bats or more. Northern long-eared bats (NLEB) seem to be flexible in selecting roosts. However, they rarely roost in human structures like barns and sheds. Bats emerge at dusk to feed. They primarily fly through the understory of forested areas. Indiana bats also forage in or along the edges of forested areas (USFWS 2019). The project area has both suitable roosting and foraging habitat for the Indiana bat and the Northern long-eared bat.

Northern monkshood is typically found on shaded to partially shaded cliffs, algific talus slopes, or similar cool, moist, streamside sites. These areas have cool soil conditions, cold air drainage, or cold groundwater flowage (USFWS 2019). In Ohio, the northern monkshood is found at the contact zone between shale and conglomerate sandstone of Mississippian and Pennsylvanian age. The most common indicator of habitat preference is the cold soil environment associated with the cliff/talus slope/algific slope and springs/headwater stream situations. In most habitat occupied by northern monkshood, there is either active and continuous cold air drainage or cold groundwater flowage out of nearby bedrock. According to the Recovery Plan for Northern Monkshood (USFWS, 1983), there were only two known populations of northern monkshood in

Ohio, one in Summit County and one in Portage County. The last discovered site in Ohio was in 1908, and the probability of finding additional sites in Ohio is low.

The Bald Eagle, while not listed under the ESA, remains protected under the Bald and Golden Eagle Protection Act. Eagles nest in areas with low human disturbance, suitable forest structure, and abundant prey. Because fish are important prey, nests are nearly always associated with fishable waters (USFWS 2020). While there is mature forest in the project area, none of the surface waters are suitable for bald eagle foraging, and impacts will occur along the roadway and near the park service center rather than in undisturbed areas.

In February 2019, OEMA requested information on the location of bald eagle nests within or adjacent to the project area. In correspondence dated February 22, 2019, USFWS confirmed that they have no records of bald eagle nests within 0.5 miles of the project area. In May 2020, FEMA submitted an online Northern long-eared bat 4(d) determination key and received verification from USFWS that any take of Northern long-eared bats that may occur as a result of the Proposed Action is not prohibited under the ESA Section 4(d) rule adopted for the species (see **Appendix C**, USFWS correspondence). In June 2020, FEMA contacted USFWS to request comment on the project. The USFWS responded by email on June 19, 2020, stating that no trees ≥3 inches diameter at breast height may be cut between April 1 and September 30. The agency does not anticipate adverse effects to any additional federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Correspondence between USFWS and FEMA is provided in **Appendix C**.

State Listed Species

The Ohio Department of Natural Resources (ODNR) maintains records of state listed species in the Natural Heritage Database system. As part of the waterway permit process for Sites 7 and 12 (discussed in **Section 6.1**), EMH&T coordinated with the ODNR on behalf of the subrecipient to conduct a search of the Natural Heritage Database. In a response dated July 29, 2019, ODNR had records of the sharp-shinned hawk (*Accipiter striatus*), a state listed species of concern, and the spotted coral-root (*Corallorhiza maculata*), a state listed potentially threatened species, within a one mile radius of Sites 7 and 12 (see **Appendix C,** ODNR correspondence). EMH&T also coordinated with ODNR to conduct an Environmental Review for Sites 1, 8, 11, 13, and 14. In a letter dated September 3, 2019 (ID Number 19-653), ODNR indicated that the project is in range of the following species:

- *Myotis sodalis* (Indiana bat) – state and federally endangered
- *Etheostoma exile* (Iowa darter) – state endangered
- *Opsopoeodus emiliae* (pugnose minnow) – state endangered
- *Fundulus diaphanous* menona (western banded killifish) – state endangered
- *Erimyzon sucetta* (lake chubsucker) – state threatened
- *Clemmys guttata* (spotted turtle) – state threatened
- *Opheodrys vernalis* (smooth greensnake) – state endangered
- *Botaurus lentiginosus* (American bittern) – state endangered

Due to the location, habitat at or near the project sites, and the type of work proposed, ODNR determined that the project is not likely to impact the spotted turtle, the smooth greensnake, or the American bittern. ODNR recommends no in water work in perennial streams between April 15 and June 30 to reduce impacts to aquatic species and recommends no trees be cut between April 1 and September 30 to avoid impact to bat species.

OEMA coordinated with ODNR on behalf of the subrecipient in March 2019 to conduct an Environmental Review for one culvert replacement and stabilization of the stream channel adjacent to Sand Run Parkway (see **Appendix C**, ODNR correspondence). The ODNR review letter (ID Number 19-187) dated April 1, 2019 identified the state threatened spotted coral-root near the project area. Spotted coralroot is an herbaceous, perennial orchid that occurs in wet to dry soils in deciduous, coniferous, or mixed forests (USDA 2020). Based on the possible presence of the spotted coral-root, ODNR indicated that a pre-construction survey may be required. In June 2020, FEMA contacted ODNR to request comment on the project's impacts and confirmation for the spotted coral-root survey. No response was received from ODNR.

Summit Metro Parks maintains a geographical database of all known locations of rare, threatened, and endangered species within the Sand Run Metro Park. The locations of sensitive species, including the spotted coral-root, are available to authorized park staff only. Species and habitats are monitored by the Conservation Department of Summit Metro Parks, including a staff botanist, wetland scientist, herpetologist, fisheries biologist, and three federally permitted endangered bat biologists. The Summit Metro Parks also employs a set of standard BMPs that are intended to identify and protect park resources.

As described in **Section 3.4.1**, the project area consists primarily of mature forest with the exceptions of walking paths, parking areas, Sand Run Parkway, and park maintenance buildings/offices, which provides potentially suitable habitat for Indiana bat, NLEB, and spotted coral-root. Along with Sand Run and the unnamed tributary to Sand Run, there are many adjacent seeps, streamside wetlands, and ephemeral and intermittent stream channels which could provide suitable habitat for the northern monkshood. Summit Metro Parks is unaware of any populations of rare, threatened, or endangered species located within or adjacent to the project area.

Alternative 1 – No Action

The No Action alternative would not directly impact federally listed or state listed threatened or endangered species because there would be no construction.

Alternative 2 – Proposed Action

The Proposed Action would have a negligible impact on threatened and endangered species. USFWS, ODNR, and Summit Metro Parks have no record of any rare, threatened, or endangered species within or immediately adjacent to the project area. Based on the preliminary schematic plans showing the estimated most extensive project footprint possible for each improvement location (**Appendix B**), the Proposed Action would remove approximately 11.3 acres of existing

vegetation (including trees) over 23 locations, impact approximately 5,554 linear feet of stream over 22 locations, and could also result in the filling of approximately 1.125 acres of wetland over 11 locations. As these estimates are based on the most extensive possible impact limits, in most cases the impact areas will be reduced in size during final design to avoid as many trees and wetland areas as possible. Additionally, no tree clearing required for the project will occur between April 1 and September 30 to avoid impact to bat species.

Along with BMPs required by USFWS and ODNR, the Summit Metro Parks standard BMPs for the protection of sensitive species and their habitat will be employed during construction of the project to avoid and minimize potential impacts to threatened and endangered species. Commitments related to avoiding and minimizing impacts to threatened and endangered species are provided in **Section 6.2.**

Alternative 3 – Stream Stabilization Only

The assessment of impacts to threatened and endangered species are the same as in the Proposed Action. The Stream Stabilization Only alternative would remove approximately 9.85 acres of existing vegetation (including trees) over 13 locations, impact approximately 4,485 linear feet of stream over 13 locations, and could also result in the filling of approximately 0.879 acres of wetland over 6 locations.

3.4.4 Migratory Birds

A migratory bird is any species or family of birds that live, reproduce, or migrate within or across international borders at some point during their annual life cycle. The Migratory Bird Treaty Act (MBTA) of 1918, as amended, 16 U.S.C. §§ 703–711, protects migratory birds and their nests, eggs, and body parts from harm, sale, or other injurious actions. All native birds, including common species such as American robin (*Turdus migratorius*) and American crow (*Corvus brachyrhynchos*) are protected by the MBTA. The project area would support migratory birds.

The Bald and Golden Eagle Protection Act, 16 U.S.C. § 668, prohibits the take, possession, sale, or other harmful action of any golden (*Aquila chrysaetos*) or bald eagle (*Haliaeetus leucocephalus*), alive or dead, including any part, nest, or egg (16 U.S.C. § 668(a)). A search of IPaC initiated by FEMA in May 2020 indicated that no migratory bird species are known or expected to be on or near the project area (USFWS Consultation reference code 03E15000-2020-SLI-1347). In correspondence dated February 22, 2019, USFWS confirmed that they have no records of bald eagle nests within 0.5 miles of the project area.

Alternative 1 – No Action

The No Action alternative would not directly impact migratory birds because there would be no construction.

Alternative 2 – Proposed Action

The Proposed Action alternative would have minor short-term impacts associated with construction activities from the removal of approximately 11.3 acres of vegetation (including trees) over 23 locations, impacts to approximately 5,554 linear feet of stream over 22 locations, and impacts to approximately 1.125 acres of wetland over 11 locations that could serve as habitat for migratory birds. All disturbed areas will be revegetated using native species.

While no specific BMPs are associated with migratory birds, these species will benefit from existing BMPs intended to avoid or minimize impacts to terrestrial and aquatic habitats and threatened and endangered species.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have similar minor short-term impacts as the Proposed Action from the removal of approximately 9.85 acres of existing vegetation (including trees) over 13 locations, and impacts to approximately 4,485 linear feet of stream over 13 locations. This alternative could also result in the filling of approximately 0.879 acres of wetland over 6 locations. All disturbed areas will be revegetated using native species.

3.4.5 Invasive Species

An invasive species is a non-native species whose introduction is likely to cause harm to the environment, economy, or human health. EO 13112, Invasive Species, requires federal agencies to prevent the introduction of invasive species and provide for their control to minimize the economic, ecological, and human health impacts caused by invasive species. Common invasive plant species in Summit County include bush honeysuckle (*Lonicera spp.*), autumn olive (*Elaeagnus umbellata*), garlic mustard (*Alliaria petiolata*), glossy buckthorn (*Frangula alnus*), privet (*Ligustrum spp*.), Japanese knotweed (*Polygonum cuspidatum*), multiflora rose (*Rosa multiflora*), common reed (*Phragmites australis*), purple loosestrife (*Lythrum salicaria*), and reed canarygrass (*Phalaris arundinacea*). Invasive insects in Summit County include viburnum leaf beetle (*Pyrrhalta viburni*), multicolored Asian lady beetle (*Harmonia axyridis*), emerald ash borer (*Agrilus planipennis*), Asian longhorned beetle (*Anoplophora glabripennis*), and brown marmorated stink bug (*Halyomorpha halys*) (OSU Extension 2020). There are no aquatic nuisance species associated with Sand Run or the unnamed tributary to Sand Run.

Alternative 1 – No Action

The No Action alternative would have no project-related impacts because construction would not occur. However, there could be minor long-term impacts on the area as any existing invasive species would continue to persist.

Alternative 2 – Proposed Action

The Proposed Action alternative would have minor short-term impacts from the potential spread of invasive species caused by construction activities. Construction activities on land could result

in the transport of invasive weed species outside of the project area through cuttings and seeds attached to vehicles. Invasive insect species could spread as individuals, larvae, or eggs via transport of cleared vegetation. This alternative would also have minor long-term benefits as disturbed areas will be revegetated with native species, providing less opportunity for invasive species to become established.

BMPs to minimize the spread of invasive species are provided in **Section 6.2.**

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts from the potential spread of invasive species caused by construction activities similar to the Proposed Action alternative. All disturbed areas will be revegetated with native species, providing minor long-term benefits.

3.5 Hazardous Materials

Hazardous materials are any items or agents (biological, chemical, radiological, or physical) that have the potential to cause harm to humans, animals, or the environment either by itself or through interaction with other factors. Sites within a 0.5 mile of the project area, regulated by federal hazardous materials laws such as the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Resource Conservation and Recovery Act (RCRA), were identified using the Ohio Department of Transportation Ohio Regulated Properties Search Tool website (ODOT 2020a).

ORPS identified two regulated sites* within a 0.5-mile radius of the project area, as summarized in **Table 3-6**. None of these sites are within the project area.

Table 3-6: Federally Regulated Sites in the Project Vicinity

Site No.	Site Name	Address	Proximity to Project Area	Applicable Law/Regulations	Notes
1	Hampton Ridge Pump Station	745 Hampton Ridge Dr., Akron, OH 44313	Approximately 0.19 mile from project area, at a higher elevation	Solid Waste Disposal Act Subchapter IX – Regulation of Underground Storage Tanks	UST Location, Diesel, Inactive, Removed 03/01/1996 LUST – Suspected release, No Further Action issued

* Two additional sites (Firestone High School at 470 Castle Boulevard–approximately 0.94 miles from project area, and Fairlawn Elementary at 65 N Meadowcroft Street–approximately 1.08 miles from project area) were included in the Spills Database based on incorrect latitude longitude coordinates.

Site No.	Site Name	Address	Proximity to Project Area	Applicable Law/Regulations	Notes
2, 3	Sand Run Metro Park	1475 Sand Run Parkway, Akron, OH 44313	Immediately adjacent to eastern end of project area, at the same elevation	Solid Waste Disposal Act Subchapter IX – Regulation of Underground Storage Tanks	UST Location, Diesel, Gasoline LUST – Two suspected releases, one closure, two No Further Action issued

Alternative 1 – No Action

Under the No Action alternative there would be no direct construction related impacts. However, minor long-term hazardous materials risk associated with construction related to ongoing maintenance would continue. This minor risk comes from both the use of construction equipment and, at Site 15 and at the AOP, from the potential exposure of unidentified contaminated materials through activities that cause ground disturbance.

Alternative 2 – Proposed Action

The Proposed Action would involve the use of construction equipment and there is a potential risk for minor short-term impacts from leaks of oils, fuels, and lubricants. The use of equipment in good condition would reduce any potential effects to an insignificant level. There is potential for minor short-term impacts from exposure of contaminated materials as a result of excavation at Site 15 and the AOP Improvement as these are located within 100 feet and 225 feet, respectively, of the underground storage tanks identified at regulated sites 2 and 3 (from **Table 3-6**). However, the park service facility is in compliance with regulations. The remaining project areas associated with the Proposed Action are not likely to be affected by known regulated sites due to distance. However, there is potential for exposure of previously unknown contaminated materials as a result of excavation and removal of soil and construction debris.

No long-term impacts from hazardous materials are anticipated. The Proposed Action would not add any hazardous facilities, operations, or materials to the project areas and would decrease the risk of the stream migrating nearer to the park service facility, which could release potentially hazardous materials during a flood.

BMPs to minimize the risk of contamination from hazardous materials are provided in **Section 6.2.**

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts related to construction activities, similar to the Proposed Action. There is potential for minor short-term impacts from exposure of contaminated materials as a result of excavation at Site 15, located

within 100 feet of the underground storage tanks identified at regulated sites 2 and 3 (from **Table 3-6**). No long-term impacts from hazardous materials are anticipated.

3.6 Socioeconomics

3.6.1 Zoning and Land Use

Sand Run Metro Park, established in 1929, falls within two municipal jurisdictions. The City of Akron is responsible for zoning within the project area from Sand Run Road to the eastern edge of the project area, while the City of Fairlawn is responsible for the portion from Revere Road to Sand Run Road. The zoning codes and maps for Akron and Fairlawn indicate the permitted land uses within the project area. These documents were used to evaluate the project's consistency with local zoning and land use. Based on the official zoning map (City of Akron 2019), the City of Akron has designated the project area as single-family residential. The City of Fairlawn's official zoning map shows that the Sand Run Metro Park area is undesignated, as are all roadways (City of Fairlawn 2017). The areas surrounding the Metro Park are designated as single-family residential and municipal district (parks and recreation).

Alternative 1 – No Action

The No Action alternative would have a no impact on existing zoning for properties within the project area, and there would be no changes to existing land uses.

Alternative 2 – Proposed Action

The Proposed Action would have no short or long-term impacts on land use as there is no conflict with, or any proposed changes to, any of the existing land uses or zoning designations in the project area.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have no short- or long-term impacts on land use as there is no conflict with, or any proposed changes to, any of the existing land uses or zoning designations in the project area.

3.6.2 Noise

The Noise Control Act of 1972 defines "noise" as an undesirable sound. Noise is regulated at the federal level by the Noise Control Act of 1972, 42 U.S.C. § 4901, et seq. Noise standards developed by USEPA (1974) provide a basis for state and local governments' judgments in setting local noise standards. In addition to the park itself, there are residential homes within 500 feet of the project area; both the park and residential areas are defined as noise-sensitive land uses using Federal Highway Administration noise abatement criteria (23 C.F.R. § 772.5).

Alternative 1 – No Action

The No Action alternative would not change ambient noise levels in the project area. Closure of Sand Run Parkway, resulting from future flooding, would continue to have minor short-term benefits from rerouting traffic, and roadway maintenance due to erosion and flooding issues would continue to have minor short-term impacts from construction related activities. The No Action Alternative would cause no long-term changes in noise levels.

Alternative 2 – Proposed Action

The Proposed Action would have minor short-term impacts to ambient noise levels in the area associated with construction activities. Construction activities would include trucks hauling materials to and from the site and the operation of equipment such as excavators for dredge and fill activities. Minor traffic noise would be expected from construction vehicles and haul trucks arriving and departing from the project area. As Sand Run Parkway will be closed for construction, existing traffic would be rerouted leading to minor short-term benefits in and around the project area due to reduced traffic noise from daily commuters. However, detoured traffic may cause minor short-term impacts to those areas with increased traffic from detoured motorists. There would also be a minor long-term benefit associated with reduced construction associated with stabilized streams and reduced flooding.

A commitment to minimize noise during project construction is noted in **Section 6.2.**

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts to ambient noise levels in the area associated with construction activities. There would be minor short-term benefits and impacts from rerouting traffic, similar to the Proposed Action. However, ongoing roadway maintenance due to flooding issues would continue to have minor long-term impacts.

A commitment to minimize noise during project construction is noted in **Section 6.2.**

3.6.3 Public Services and Utilities

The project area falls within two municipal jurisdictions, the City of Akron and the City of Fairlawn. Both are served by municipal police and fire departments and municipal public school districts. The hospital closest to the project site, Summa Health System General Hospital, is approximately 3.5 miles south. No Metro Regional Transit Authority bus routes use Sand Run Parkway (Metro RTA 2020). While residential neighborhoods surround the Sand Run Metro Park, there is no access to these areas via Sand Run Parkway within the project area. No police, fire, public schools, or municipal facilities are located within or adjacent to the project area, with the exception of the Summit Metro Parks (the subrecipient) administrative offices and some Sand Run Metro Park facilities. The Sand Run Metro Park is the most visited park in the Summit Metro Parks system, with over 1.7 million visitors each year.

The City of Akron maintains a sanitary sewer line adjacent to Sand Run Parkway throughout the project area. No other public utilities run through the project area.

Alternative 1 – No Action

The No Action alternative would have minor short-term and moderate long-term impacts on the ability of people in the surrounding areas to access police or fire services, public schools, or reach local hospitals. Temporary road closures on Sand Run Parkway would continue due to the flooding caused by undersized culverts. These roadway closures require detours and could increase travel distances on detour routes and limit access to the park's amenities. However, the detour length would likely not have a significant effect on emergency travel times as there are multiple alternative routes depending on the origin and destination. Traffic on detoured routes is unlikely to rise to a level that would impact emergency vehicle travel times. If stream erosion and flooding are left unmitigated, the roadway could eventually become unstable, requiring permanent closure and threatening the integrity of the sanitary sewer line.

Alternative 2 – Proposed Action

The Proposed Action would have a minor short-term impact on the ability of people in the surrounding areas to access public services and park amenities due to the temporary closure of Sand Run Parkway during construction. The Proposed Action would provide major, long-term benefits to public services and utilities by:

- Reducing the potential for future road closures due to flooding;
- Reducing the potential for access restriction to park amenities due to the closure of Sand Run Parkway (due to flooding and roadway embankment de-stabilization);
- Providing a more reliable route for public service and emergency vehicle access along Sand Run Parkway; and
- Protecting the existing sanitary sewer line, which covers 4,515 acres and serves approximately 6,557 parcels, from future flooding and erosion.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have a minor short-term impact due to construction activities, similar to the Proposed Action. This alternative would provide moderate long-term benefits to public services and utilities, which would occur by stabilizing the stream banks along Sand Run Parkway. However, flooding due to undersized culverts would not be addressed or corrected under this alternative. Minor short-term impacts would result from continued roadway flooding and road closures, threatening the integrity of Sand Run Parkway and the sanitary sewer line, and restricting public access to the park.

3.6.4 Traffic and Circulation

Sand Run Parkway is a two-lane private road that traverses the Sand Run Metro Park in an east-west direction and provides access to numerous park facilities and amenities. Data on average

daily traffic on Sand Run Parkway within the project area was obtained from the subrecipient. The road provides a route of travel for an average of 4,400 vehicles per day. Vehicles often use the Sand Run Parkway route in order to bypass congestion on nearby local roads, such as Market Street and Smith Road. Closure of Sand Run Parkway due to flooding and potential pavement instability would require a detour and would limit public access to the park's amenities.

A paved trail runs the length of Sand Run Parkway within the project area providing pedestrian and bicycle access. Smaller hiking trails exist within the park, including along Sand Run, as shown in **Figure 2** of **Appendix A**.

Alternative 1 – No Action

The No Action alternative would have minor short-term and moderate long-term impacts on traffic and circulation in the area. Road damage and closures to Sand Run Parkway would continue and potentially increase, resulting in continued temporary traffic detours around the area for flooded roads and ongoing maintenance construction. Pedestrian and bicycle access on the paved trail would continue to be unavailable at times and hiking trails may be closed due to flooding and erosion. If stream erosion and flooding are left unmitigated, the roadway could eventually become unstable, requiring permanent closure.

Alternative 2 – Proposed Action

The Proposed Action would result in minor short-term impacts resulting from construction detours, and from the operation of construction vehicles and equipment to and from the site. The Proposed Action would have major, long-term benefits to traffic and circulation in and around the project area as road closures due to flooding and erosion concerns would be reduced and potentially eliminated, increasing the reliability of travel through the project area for motorists, bicyclists, and pedestrians.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have minor short-term impacts resulting from construction detours, similar to the Proposed Action alternative. This alternative would provide minor long-term benefits by stabilizing the stream banks along Sand Run Parkway and reducing the frequency of road closures. However, flooding due to undersized culverts would not be addressed or corrected under this alternative. Moderate long-term impacts would result from continued roadway flooding and road closures.

3.6.5 Environmental Justice (Executive Order 12898)

EO 12898, Federal Actions to Address Environmental Justice (EJ) in minority and low-income Populations, requires agencies to identify and address disproportionately high and adverse human health or environmental effects their activities may have on minority or low-income populations. EJSCREEN, a screening and mapping tool developed by EPA, was used to identify

low-income and minority populations in the project area based on the 2013–2017 ACS developed by the U.S. Census Bureau (USEPA 2020).

Low income populations are identified based on the annual statistical poverty thresholds from the U.S. Census Bureau. Minorities, defined as individual(s) who are American Indian or Alaskan Native; Asian or Pacific Islander; Black, or Hispanic, are identified when either (a) the minority population of the affected area exceeds 50 percent or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population (CEQ 1997). The project area is located across five census block groups, as shown in **Table 3-7**. Minority populations range from 5% to 65% and low-income populations range from 7% to 60%. Block Group 391535071011 exceeds the Summit County population percentage for minority and low-income residents.

Table 3-7: Environmental Justice Populations

Area	Population	% Minority	% Low Income
Block Group 391535071011	1,030	65%	57%
Block Group 391535080003	700	4%	14%
Block Group 391535323023	2,153	6%	7%
Block Group 391535322021	647	0%	9%
Block Group 391535071021	1,171	6%	13%
Summit County	**541,318**	**22%**	**31%**

Alternative 1 – No Action

There are no public transit routes that run along Sand Run Parkway and no direct access points to other public services from Sand Run Parkway (besides the Sand Run Metro Park itself) that would disproportionately impact EJ populations. Under the No Action alternative, flooding and erosion would continue to cause occasional road closures and detours along Sand Run Parkway, which effect all populations equally. Therefore, the No Action alternative would not have a disproportionate high or adverse effect on EJ populations.

Alternative 2 – Proposed Action

The Proposed Action would not have any disproportionately high and adverse effects on EJ populations. Minor short-term construction-related effects would include noise, traffic, and air quality impacts; but these impacts would be borne equally on all populations. Increased traffic from construction detours is not likely to increase to a level that would disproportionately affect EJ populations. No business or residential displacement or relocations are proposed, and no long-term impacts from traffic, noise, or air quality on EJ populations are anticipated.

Alternative 3 – Stream Stabilization Only

The Stream Stabilization Only alternative would have the same impacts to EJ populations as the Proposed Action. This alternative would not have any disproportionately high and adverse effects on EJ populations.

3.6.6 Safety and Security

The Occupational Safety and Health Act requires safe and healthful conditions for working men and women by setting and enforcing standards and providing training, outreach, education, and compliance assistance. The act created the Occupational Safety and Health Administration (OSHA) which established construction standards under 29 C.F.R. § 1926. In addition, EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, directs federal agencies to identify and assess environmental health and safety risks that may disproportionately affect children to ensure their policies, programs, activities, and standards address those risks. The EO broadly defines environmental health and safety risks as products or substances that a child is likely to come in contact with or ingest through the air, soil, water, or food. EJSCREEN was used to identify the percentage of children who live in the project area based on the 2013–2017 ACS. Approximately 2,492 (18%) of the population within a one-mile radius of the project area are ages 0 to 17 (USEPA 2020). Safety risks in the project area include flooding that could cause damage and closure of Sand Run Parkway, tree fall, and the risk of failure of the sanitary sewer during a significant flood.

Alternative 1 – No Action

Because the erosion and flooding would be left unmitigated, the No Action alternative would potentially have moderate long-term impacts on the safety of the public using the road due to flooding and tree fall. Construction activity would continue to occur as part of the ongoing maintenance efforts associated with erosion and flooding and minor long-term impacts would be possible due to standard construction-related safety risks for workers involved.

Alternative 2 – Proposed Action

Minor short-term impacts associated with construction-related safety risks would occur for construction workers at the project site. During construction, site safety from construction equipment would be ensured by the contractors performing the work. The Proposed Action would provide moderate long-term benefits as reduced erosion and flooding in the project area would reduce the risk to the public using the road due to flooding and tree fall. There are no safety risks that would disproportionately affect children.

Alternative 3 – Stream Stabilization Only

This alternative would have minor long-term benefits to the safety and security of the public using the road as stream erosion and tree fall would be reduced. However, flooding would continue at undersized culverts and minor, long-term impacts related to flooding would occur. Minor long-term impacts associated with construction related safety risks would occur for

construction workers involved in the ongoing maintenance for flooded areas. There are no safety risks that would disproportionately affect children.

3.7 Historic and Cultural Resources

3.7.1 Archaeology and Standing Structures

Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, 16 U.S.C. § 470f, requires that federal agencies consider the potential effects of actions it proposes to fund on cultural resources. Cultural resources are defined as prehistoric or historic archaeology sites, historic standing structures, historic districts, objects, artifacts, and cultural properties of historic or traditional significance—referred to as Traditional Cultural Properties—that may have religious or cultural significance to federally-recognized Indian Tribes (Tribes). Any other physical evidence of human activity considered important to a culture, subculture, or community for scientific, traditional, religious, or other reasons is also considered a cultural resource. The State Historic Preservation Office (SHPO) is the federal agency's primary Section 106 partner, as is the Tribal Historic Preservation Officer (THPO) for projects affecting resources on tribal lands. For purposes of compliance with NEPA and NHPA, each alternative is evaluated for its potential to impact cultural resources.

Cultural resources listed on or eligible for listing on the National Register of Historic Places (NRHP) are subject to protection from adverse impacts resulting from a federally funded undertaking. To be considered eligible for listing, a cultural resource must meet one or more of the criteria regarding the resource's significance, as well as demonstrate integrity of physical features or other characteristics that are related to that significance. Eligibility criteria for listing a property in the NRHP are detailed in 36 C.F.R. Part 60. Under the implementing regulations for conducting Section 106 consultation under the NHPA at 36 C.F.R. Part 800, the federal agency is required to determine whether resources are eligible for listing and obtain concurrence on that finding from the SHPO or THPO as appropriate. Ohio's SHPO, an office within the Ohio History Connection (OHC), maintains records of known historic properties in the state in the Ohio Historic Inventory.

Pursuant to 36 C.F.R. § 800.4(a)(1), the Area of Potential Effects (APE) is defined as the geographic area(s) within which the undertaking may directly or indirectly affect cultural resources. Within the APE, impacts on cultural resources are evaluated for both historic structures (aboveground cultural resources) and archaeology (belowground cultural resources).

In addition to the NHPA, FEMA must also comply with the following federal laws that relate to historic and cultural resources:

- The Archaeological and Historic Preservation Act of 1974, 16 U.S.C. § 469-469c-2, provides for the survey, recovery, and preservation of significant scientific, prehistoric, archeological or paleontological data when such data may be destroyed or irreparably lost due to a federal, federally licensed, or federally funded (in part or in whole) project.

- American Indian Religious Freedom Act of 1978 (AIRFA), 42 U.S.C. § 1996, which provides for the protection and preservation of American Indian sites, possessions, and ceremonial and traditional rites.
- Archaeological Resources Protection Act of 1979, 16 U.S.C. §§ 470aa–470 mm, which provides for the protection of archaeological resources on public lands and Indian lands.
- Native American Graves Protection and Repatriation Act, 25 U.S.C. §§ 3001–3013, in cases where Native American cultural Items are found on federal and tribal lands.

Tribal coordination is discussed in **Section 3.7.1**.

To comply with NHPA, FEMA authorized OEMA to initiate consultation with SHPO on the agency's behalf in a letter dated February 21, 2019. The consultation letter included a Section 106 Project Summary Form summarizing the work funded through the HMGP and reporting a finding of no historic properties affected. The SHPO concurred in a letter dated March 14, 2019, noting that no further coordination was necessary unless the scope of the project changed.

Because this Environmental Assessment considers project areas funded by a grant from the Clean Ohio Green Space Conservation Program which are included as matching funds for the FEMA-funded HMGP Grant, FEMA reopened consultation with SHPO to report the corresponding expansion of the APE and review potential impacts within those areas. In response to FEMA's finding dated June 10, 2020, SHPO reaffirmed its concurrence on June 22, 2020, noting that no further coordination is required unless the project scope changes or archaeological remains are discovered during the course of the project. Copies of all correspondence are included in **Appendix C**.

Alternative 1 – No Action

The No Action alternative would have no effect on historic structures or archeological resources in the project area because there would be no construction or ground-disturbing activities.

Alternative 2 – Proposed Action

Based on coordination with SHPO, the Proposed Action would have no effect on known historic structures or archeological resources listed or eligible for listing in the NRHP. Project conditions to minimize impacts related to the provision of fill materials or in the event of unexpected discoveries of archaeological resources during construction are noted in **Section 6.2.**

Alternative 3 – Stream Stabilization Only

Based on coordination with SHPO, the Stream Stabilization Only alternative would have no effect on known historic structures or archeological resources listed or eligible for listing in the NRHP because none were identified in the project area. Project conditions to minimize impacts related to the provision of fill materials or in the event of unexpected discoveries of archaeological resources during construction are noted in **Section 6.2.**

3.7.2 Tribal Coordination and Religious Sites

Pursuant to the NHPA, in accordance with 36 C.F.R. §800.8(a)(2), the Advisory Council on Historic Preservation indicates that consultation with Tribes should begin early in the NEPA process regarding the possible effects of disaster recovery efforts on cultural properties of religious or traditional cultural significance, or TCPs. Amendments to Section 101 of the NHPA in 1992 strengthened the connection between the NHPA and AIRFA (42 U.S.C. § 1996). AIRFA requires consultation with Native American groups concerning proposed actions on sacred sites on federal land or affecting access to sacred sites. It establishes federal policy to protect and preserve for American Indians, Eskimos, Aleuts, and Native Hawaiians their right to free exercise of their religion in the form of site access, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rites. AIRFA requires federal agencies to consider the impact of their actions on religious sites and objects important to these peoples, regardless of eligibility for listing on the NRHP.

EO 13175, Consultation and Coordination with Indian Tribal Governments, directs federal agencies, "to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes…."

FEMA submitted letters notifying Tribes with potential interests in Summit County regarding this undertaking on May 4, 2020. That letter asked each Tribe with potential interests in the project area to notify FEMA if the project had the potential to affect archaeological or religious sites or other TCPs of interest to the Tribe within the proposed project area. FEMA's notification letters to Tribes also requested notice from the Tribe if they are aware of other Tribes that may have an interest in the project area. The May 4 mailing included notice to the following Tribes:

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

FEMA requested that comments be received by email within 30 days of the date of the letter.

FEMA received an email response from the Seneca Nation on May 7, 2020. The Tribe stated that, because of the project location, Seneca Nation has no opinion on the protection of the area in general and wishes to consult only if cultural resources or burials are discovered. The THPO of the Forest County Potawatomi responded by email on June 2, 2020, requesting additional information regarding the undertaking. FEMA responded to both tribes on June 10, 2020, acknowledging their responses and providing the documentation sent to SHPO on the same day. At the suggestion of Summit Metro Parks, FEMA also notified the Shawnee Tribe regarding the undertaking on May 29, 2020. No further responses were received. Correspondence with the tribal nations is provided in **Appendix D**. On June 10, 2020, FEMA also provided the Seneca Nation and the Forest County Potawatomi copies of the scoping document sent to FEMA's

agency partners with a request that responses to the scoping document be received by email before July 20. The Seneca Nation responded by email on June 18, noting that they would provide no comment unless archaeological artifacts were uncovered during work on the project.

Alternative 1 – No Action

The No Action alternative would have no effect on known sites of religious or cultural interest to Indian Tribes as no construction or ground disturbance activities would occur.

Alternative 2 – Proposed Action

Based on tribal nation coordination, the Proposed Action would have no effect on known sites of religious or cultural interest to Indian Tribes. Project conditions to minimize impacts in the event of unexpected discoveries of archaeological resources during construction are noted in **Section 6.2**.

Alternative 3 – Stream Stabilization Only

Based on tribal nation coordination, the Stream Stabilization Only alternative would have no effect on known sites of religious or cultural interest to Indian Tribes. Project conditions to minimize impacts in the event of unexpected discoveries of archaeological resources during construction are noted in **Section 6.2**.

3.8 Comparison of Alternatives

Table 3-8 Comparison of Alternatives

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and Mitigation	Alternative 3: Stream Stabilization Only Impacts and Mitigation
Geology, Soils, and Topography	No impacts to geology. Potential for moderate long-term impacts to soils and topography due to continued erosion and flooding.	Minor short-term impacts to soils and topography due to construction. Minor long-term impact to topography at AOP Improvement. Moderate long-term benefits due to reduced erosion and flooding. ***See Mitigation Section 6.2, Conditions 3-4.***	Minor short-term impacts to soils and topography due to construction. Moderate long-term benefits due to reduced erosion. ***See Mitigation Section 6.2, Conditions 3-4.***

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and Mitigation	Alternative 3: Stream Stabilization Only Impacts and Mitigation
Water Resources and Water Quality	No short-term impacts. Potential for moderate long-term impacts due to continued erosion and flooding and major long-term impacts should the sanitary sewer line fail.	Minor short-term impacts due to construction. Major long-term benefits associated with reduced erosion and flooding and protection of infrastructure. ***See Mitigation Section 6.2, Conditions 3-11.***	Minor short-term impacts due to construction. Moderate long-term benefits due to reduced erosion. Potential for minor long-term impacts due to continued flooding and major long-term impacts should the sanitary sewer line fail. ***See Mitigation Section 6.2, Conditions 3-11.***
Floodplain Management	No short-term impacts. Potential for moderate long-term impacts due to continued erosion and flooding, continued maintenance, and road closures.	Minor short-term impacts due to construction. Major long-term benefits due to reduced erosion and flooding. ***See Mitigation Section 6.2, Conditions 9-10.***	Minor short-term impacts due to construction. Moderate long-term benefits due to reduced erosion. Moderate long-term impacts from continued flooding and road closures. ***See Mitigation Section 6.2, Conditions 9-10.***
Air Quality	Minor long-term impacts from construction emissions due to ongoing erosion and flooding.	Minor short-term impacts owing to the use of construction equipment. No long-term adverse impacts on air quality. ***See Mitigation Section 6.2, Conditions 12-14.***	Minor short-term impacts owing to the use of construction equipment. Minor long-term impacts from construction emissions due to ongoing flooding. ***See Mitigation Section 6.2, Conditions 12-14.***

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and Mitigation	Alternative 3: Stream Stabilization Only Impacts and Mitigation
Terrestrial and Aquatic Environment	Potential for moderate long-term impacts due to continued erosion and flooding, and barrier to aquatic organism passage.	Minor short-term impacts due to construction (11.3 acres of vegetation clearing over 23 locations, 5,554 feet of stream impact over 22 locations, and 1.125 acres of wetland fill over 11 locations). Moderate long-term benefits of reduced sedimentation and improved aquatic habitat and water quality. ***See Mitigation Section 6.2, Conditions 3-11, 15-18.***	Minor short-term impacts due to construction (9.85 acres of vegetation clearing over 13 locations, 4,485 feet of stream impact over 13 locations, and 0.879 acres of wetland fill over six locations). Moderate long-term benefits of reduced sedimentation. Moderate long-term impacts due to continued flooding and barrier to aquatic organism passage. ***See Mitigation Section 6.2, Conditions 3-11, 15-18.***
Wetlands	No project-related short or long-term impacts.	Minor long-term impacts due to 1.125 acres of wetland fill over 11 locations. ***See Mitigation Section 6.2, Conditions 4-7.***	Minor long-term impacts due to 0.879 acres of wetland fill over six locations. ***See Mitigation Section 6.2, Conditions 4-7.***
Threatened and Endangered Species	No project-related short or long-term impacts.	Negligible impact to threatened and endangered species. ***See Mitigation Section 6.2, Conditions 15-18.***	Negligible impact to threatened and endangered species. ***See Mitigation Section 6.2, Conditions 15-18.***
Migratory Birds	No project-related short or long-term impacts.	Minor short-term impacts due to 11.3 acres of vegetation clearing over 23 locations, 5,554 feet of stream impact over 22 locations, and 1.125 acres of wetland fill over 11 locations. ***See Mitigation Section 6.2, Conditions 15-18.***	Minor short-term impacts due to 9.85 acres of vegetation clearing over 13 locations, 4,485 feet of stream impact over 13 locations, and 0.879 acres of wetland fill over six locations. ***See Mitigation Section 6.2, Conditions 15-18.***

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and Mitigation	Alternative 3: Stream Stabilization Only Impacts and Mitigation
Invasive Species	Potential for minor long-term impacts as invasive species persist in the area.	Minor short-term impact from the potential spread of invasive species outside of the project area due to construction. Minor long-term benefits as disturbed areas are revegetated with native species. ***See Mitigation Section 6.2, Conditions 17-18.***	Minor short-term impact from the potential spread of invasive species outside of the project area due to construction. Minor long-term benefits as disturbed areas are revegetated with native species. ***See Mitigation Section 6.2, Conditions 17-18.***
Hazardous Materials	Potential for minor long-term impacts from ongoing construction.	Minor short-term impacts potential leaks of oils, fuels, and lubricants from construction equipment. Minor short-term impacts from potential exposure of contaminated materials during excavation. ***See Mitigation Section 6.2, Conditions 19-22.***	Minor short-term impacts potential leaks of oils, fuels, and lubricants from construction equipment. Minor short-term impacts from potential exposure of contaminated materials during excavation. ***See Mitigation Section 6.2, Conditions 19-22.***
Zoning and Land Use	No impact on existing zoning nor would there be any change to existing land uses.	No impact on existing zoning nor would there be any change to existing land uses.	No impact on existing zoning nor would there be any change to existing land uses.

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and Mitigation	Alternative 3: Stream Stabilization Only Impacts and Mitigation
Noise	Minor short-term impacts from ongoing construction activities. Minor short-term benefits from traffic rerouted due to road closures.	Minor short-term impacts from construction activities. Minor short-term benefits from traffic rerouted due to construction and minor short-term impacts to areas where traffic will increase due to detoured motorists. Minor long-term benefits from reduced ongoing construction. ***See Mitigation Section 6.2, Condition 23.***	Minor short-term impacts from construction activities. Minor long-term impacts from ongoing construction related to flooding. Minor short-term benefits from traffic rerouted due to construction and minor short-term impacts to areas where traffic will increase due to detoured motorists. ***See Mitigation Section 6.2, Condition 23.***
Public Services and Utilities	Minor short-term impacts due to road closures from flooding and erosion and ongoing maintenance. Moderate long-term impacts due to potential permanent road closure and threat to sanitary sewer line.	Minor short-term impacts from construction activities. Major long-term benefits from reduced road closures, reliable route of travel, and protected sanitary sewer line. ***See Mitigation Section 6.2, Condition 24.***	Minor short-term impacts from construction activities. Minor short-term impacts due to ongoing road closures from flooding. Moderate long-term benefits from stabilized banks protecting the roadway and sanitary sewer line. ***See Mitigation Section 6.2, Condition 24.***
Traffic and Circulation	Minor short-term impacts due to road closures from flooding and erosion and ongoing maintenance. Moderate long-term impacts due to potential permanent road closure	Minor short-term impacts from construction activities. Major long-term benefits from reliable route of travel and reduced road closures. ***See Mitigation Section 6.2, Condition 24.***	Minor short-term impacts from construction activities. Minor long-term benefits from stabilized banks protecting the roadway. Moderate long-term impacts due to road closures from flooding. ***See Mitigation Section 6.2, Condition 24.***

Affected Environment	Alternative 1: No Action Impacts	Alternative 2: Proposed Action Impacts and Mitigation	Alternative 3: Stream Stabilization Only Impacts and Mitigation
Environmental Justice	No disproportionately high or adverse effect.	No disproportionately high or adverse effect.	No disproportionately high or adverse effect.
Safety and Security	Moderate long-term impacts due to flooding and tree fall. Minor long-term impacts due to ongoing construction.	Minor short-term impacts during construction. Moderate long-term benefits from reduced flooding and tree fall risk. ***See Mitigation Section 6.2, Conditions 25-27.***	Minor short-term construction-related safety risks. Minor long-term benefits from reduced tree fall risk. Minor long-term impacts due to flooding and ongoing construction. ***See Mitigation Section 6.2, Conditions 25-27.***
Historic and Cultural Resources	No project-related short or long-term impacts.	No project-related short or long-term impacts. ***See Mitigation Section 6.2, Conditions 28-29.***	No project-related short or long-term impacts. ***See Mitigation Section 6.2, Conditions 28-29.***
Tribal Coordination and Religious Sites	No project-related short or long-term impacts.	No project-related short or long-term impacts. ***See Mitigation Section 6.2, Conditions 28-29.***	No project-related short or long-term impacts. ***See Mitigation Section 6.2, Conditions 28-29.***

4 CUMULATIVE IMPACTS

This section evaluates the potential cumulative impacts associated with the implementation of the Proposed Action. Cumulative impacts are defined in CEQ regulations for implementing NEPA (40 C.F.R. § 1508.7) as:

> "The impacts of a proposed action when combined with impacts of past, present, or reasonably foreseeable future actions undertaken by any agency or person."

CEQ regulations require an assessment of cumulative effects during the decision-making process for federal projects. Cumulative impacts can result from individually minor but collectively significant actions. For the purpose of the cumulative impact analysis, the project area was expanded to include the entirety of the Sand Run Metro Park as shown in **Figure 2** of **Appendix A**.

Besides the Proposed Action, the subrecipient is currently performing emergency repair work for a culvert replacement (Culvert 41) and stream stabilization both upstream and downstream of the culvert (Sites 9 and 10). At this location, several pipe culverts carry a small tributary under Sand Run Parkway. Culvert 41 serves a drainage area of 0.7 miles (448-acres). Hydraulic analysis

and observation indicate this culvert overtops the roadway for rainfall events less than a 2-year recurrence level. Immediately downstream of the culverts is a bridge over the small tributary. The Summit County Engineer has determined that this bridge is unsafe for all traffic and Summit Metro Parks has closed the bridge and adjacent trail. This work is funded by the Clean Ohio Green Space Conservation Program but is not part of the local match for the FEMA Hazard Mitigation Grant Program funded actions.

The subrecipient has also identified two additional AOP Improvement locations along Sand Run within the project area that are not included in the Proposed Action but may be constructed in the future. One site is the Sand Run Parkway ford low-water crossing, located approximately 0.29 miles west of the drive that leads to the Mingo Lodge. The other site is the manmade waterfall created immediately upstream of the bridge that carries the drive to the Mingo Lodge over Sand Run, located approximately 175-feet north of Sand Run Parkway.

Additionally, while Sand Run continues to flow east beyond the Proposed Action project area, numerous smaller tributaries to the Cuyahoga River exist in the eastern portion of the park. These tributaries are carried via multiple small culverts under Sand Run Parkway and Riverview Road. Future potential flooding and erosion issues are possible at these locations which may eventually require mitigation. However, no additional stream stabilization, culvert improvements, or AOP improvements are functionally dependent on either the Proposed Action or the Stream Stabilization Only alternatives. Any additional improvements performed within the Sand Run Metro Park would be independent of both the Proposed Action and the Stream Stabilization Only alternatives.

The Proposed Action would not change the capacity or vehicle mix on Sand Run Parkway nor would it change the existing land use in the project area. The potential negative impacts of the Proposed Action are generally negligible or minor short-term, construction-related impacts that will be offset through best management practices and long-term benefits of the Proposed Action alternative. Because the current and potential additional improvements are similar in scope and have comparable short-term, construction-related impacts as the Proposed Action and the Stream Stabilization Only alternatives, there would be no cumulative negative effects resulting from the project. The long-term cumulative, beneficial effects of the Proposed Action and other future proposed work in Sand Run Metro Park would result in reduced flood risk, reduced long-term maintenance caused by erosion and flooding, protection of existing infrastructure, and improved aquatic habitat and water quality.

5 PUBLIC PARTICIPATION

The Summit Metro Parks Board of Park Commissioners holds monthly board meetings which are open to and attended by the public. Proposed projects and park initiatives, including the Sand Run Stabilization and Infrastructure Improvement Project, have been addressed and discussed regularly at these meetings as early as 2013. The most recent discussion was held at the August 11, 2020 board meeting. A summary of references to this project from board meeting minutes are provided in **Appendix F**.

In preparation for the draft EA, initial public notice mentioning part of the work outlined in this EA was published in the *Akron Beacon Journal* on April 1, 2019. The notice was also posted on the Summit Metro Parks website. No public comments were received as a result of these notices. In addition, the subrecipient issued a press release on July 15, 2020 regarding the beginning of construction for locations being funded through the Clean Ohio Green Space Conservation Program that are not part of the project outlined in this EA. The press release included notification of additional work to be done related to this project and provided a link to a Summit Metro Parks blog post providing additional information. A public notice announcing the availability of this EA for review was published in the *Akron Beacon Journal.* Copies of the public notices, press release, blog post, and related materials are provided in **Appendix F**.

This EA is available for agency and public review and comment for a period of 30 days. It is available on FEMA's website at *https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/5 and* on the Summit Metro Parks website at *https://www.summitmetroparks.org/news-and-publications.aspx.*

A hard copy of this EA can be made available upon request, by contacting the FEMA Region V Regional Environmental Officer, Mr. Duane Castaldi. Mr. Castaldi's contact information is provided below.

This EA reflects the evaluation and assessment of the federal government, the decision-maker for the federal action; however, FEMA will take into consideration any substantive comments received during the public review period to inform the final decision regarding grant approval and project implementation. The public is invited to submit written comments by emailing duane.castaldi@fema.dhs.gov or via mail to:

> Duane Castaldi, Regional Environmental Officer
> Attn: Sand Run Stabilization and Infrastructure Improvement Project EA Comments
> FEMA Region V
> 536 South Clark Street, 6th Floor
> Chicago, IL 60605

If FEMA receives no substantive comments from the public and/or agency reviewers, this EA will be adopted as final, and FEMA will issue a Finding of No Significant Impact (FONSI). If FEMA receives substantive comments, it will evaluate and address those comments as part of the FONSI documentation and may consider whether changes to the grant or project implementation are appropriate.

6 MITIGATION MEASURES AND PERMITS

6.1 Permits

The subrecipient has obtained some of the permits and authorizations required for implementation of the Proposed Action. For Sites 7 and 12, in accordance with Clean Water Act and State of Ohio law (ORC §6111) for impacts to waters of the U.S. and waters of the state, the USACE authorized work under Nationwide Permit 13, Bank Stabilization, and a Ohio EPA issued a Director's Authorization (ID No. 196514, 01/02/2020). For Sites 1, 8, 11, 13, 14, and Culvert 41, authorization was provided by the USACE under Nationwide Permit 3, Maintenance. No Director's Authorization from the Ohio EPA was needed. See **Appendix C** for correspondence associated with these permit approvals.

Table 6-1 summarizes the potentially necessary permits needed to implement the Proposed Action and their status. It is the responsibility of the subrecipient to obtain these permits and approvals prior to construction.

Table 6-1: Permit Summary

Issuing Agency	Resource	Permit Title	Applicable Regulation/ Law	Status
USACE	Waters of the U.S./ Wetlands	Nationwide Permit Program (NWP)	Clean Water Act	NWPs were issued for Sites 1, 7, 8, 11, 12, 13 and 14 (see **Appendix C**). All other Culvert and Stream Stabilization sites may require permits which have not yet been obtained.
Ohio EPA	Ephemeral streams/ isolated wetlands	Ephemeral Stream and Isolated Wetland General Permit	Ohio Revised Code §6111	Sites may require permits which have not yet been obtained.

Issuing Agency	Resource	Permit Title	Applicable Regulation/ Law	Status
Ohio EPA	Water Quality	Section 401 Water Quality Certification	Clean Water Act	Director's Authorizations were issued for Sites 7 and 12 (see **Appendix C**). Ohio EPA permits are not needed for Sites 1, 8, 11, 13, and 14. All other Culvert and Stream Stabilization sites may require permits which have not yet been obtained.
Ohio EPA, City of Akron, City of Fairlawn, Summit Soil & Water Conservation District	Stormwater	General Permit Authorization for Stormwater Discharges associated with construction activity under the NPDES	Clean Water Act	Sites may require a Notice of Intent for permit coverage which has not yet been obtained.
Summit County Engineer's Office	Structures	Building Permit, Commercial Plan Review	107.5.1 Ohio Building Code	Plan approval received May 2016 for Site 14 retaining wall. Additional plan approval may be needed and have not been obtained.
City of Akron, City of Fairlawn	Floodplains	Floodplain Development	National Flood Insurance Program	Plan approval received August 2016 for Sites 1, 8, 11, 13, and 14. Additional plan approvals may be needed and have not been obtained.

Issuing Agency	Resource	Permit Title	Applicable Regulation/ Law	Status
City of Akron, City of Fairlawn	Grading Plan Approval	Grading/Paving Permit	Local Ordinance	Plan approval received August 2016 for Sites 1, 8, 11, 13, and 14. Additional plan approvals may be needed and have not been obtained.

6.2 Project Conditions

The subrecipient is responsible for compliance with federal, state, and local laws and regulations, including obtaining any necessary permits prior to beginning construction activities, and adhering to any conditions laid out in these permits. Any substantive change to the scope of work will require re-evaluation by FEMA for compliance with NEPA and any other laws or EOs. Failure to comply with FEMA grant conditions may jeopardize federal funding.

General Project Conditions

1. The subrecipient is responsible for obtaining and complying with all required local, state, and federal permits and approvals.
2. If deviations from the proposed scope of work result in substantial design changes, the need for additional ground disturbance, additional removal of vegetation, or any other unanticipated changes to the physical environment, the subrecipient must contact FEMA so that the revised project scope can be evaluated for compliance with NEPA and other applicable environmental laws.

Summit Metro Parks employs a set of standard BMPs that are intended to identify and protect park resources. These practices will be utilized at all stages of this project and are included as appropriate below. Work limits will be considered on a site-specific basis and will be minimized to avoid protected resources to the maximum extent practical. The following conditions address mitigation of impacts to specific areas addressed in the Environmental Assessment:

Soils

3. All removed material will be disposed of off-site according to Ohio EPA Non-hazardous Waste Rules and Laws (Ohio Administrative Code Chapter 3745).
4. Projects will provide BMPs and Erosion and Sediment controls to satisfy Ohio EPA NPDES Construction General Permit for Stormwater Activities requirements.

Water Resources and Water Quality

5. The subrecipient will obtain a permit for impacts on waters of the U.S. in accordance with Sections 401 and 404 of the CWA.
6. The subrecipient will obtain necessary compensatory mitigation for wetland impacts.
7. The subrecipient will develop a stormwater pollution prevention plan for earth-disturbing activities in accordance with the Ohio EPA NPDES permit.
8. Materials used for fill or bank protection will consist of suitable material free from toxic contaminants in other than trace quantities.
9. Excavated materials will be disposed of in upland areas away from waters of the U.S and waters of the state.

Floodplain Management

10. The subrecipient will obtain written approval or a permit from the City of Akron and the City of Fairlawn floodplain managers and the subrecipient must follow all conditions of approval.
11. Construction staging and access for the Proposed Action will occur outside the mapped floodplain to the maximum extent practical.

Air Quality

12. The subrecipient will implement EPA recommendations for mitigation included in **Appendix C** to the extent practical.
13. To reduce the emission of criteria pollutants, construction equipment engine idling will be minimized to the extent practicable and engines will be kept properly maintained.
14. Open construction areas will be minimized and watered as needed to minimize particulates such as fugitive dust.

Threatened and Endangered Species

15. No trees 3 inches in diameter or greater at breast height may be cut between April 1 and September 30 of any year. If this time restriction cannot be met, the applicant will contact the OEMA and FEMA for additional consultation with USFWS.
16. No in-water work will be performed between April 15 and June 30 to protect spawning activities of indigenous fish species unless an In-Water Work Restriction Waiver is obtained from ODNR.

Invasive Species

17. To minimize the spread of invasive species, construction equipment will be washed prior to contact with waters and unpaved areas.
18. All disturbed green spaces will be revegetated using native species.

Hazardous Materials

19. For ground disturbing activity at site 15 and at the AOP, if contaminated soil is encountered during construction, it should be treated, stored, or disposed of according to applicable federal, state, and local regulations.
20. Any hazardous materials discovered, generated, or used during construction of the Proposed Action will be disposed of and handled by the subrecipient in accordance with applicable federal, state, and local regulations.
21. Construction equipment will be kept in good working order. Any equipment to be used over, in, or within 100 feet of water will be inspected daily for fuel and fluid leaks. Any leaks will be promptly contained and cleaned up, and the equipment will be repaired.
22. In the event of an inadvertent spill, the subrecipient must immediately call the Ohio EPA Spill Hotline at 1-800-282-9378 and the Ohio EPA Division of Surface Water at 614-644-2001.

Noise

23. To minimize noise impacts, construction activities will be limited to regular business hours consistent with the local noise ordinances established by the City of Akron and the City of Fairlawn.

Public Services

24. The subrecipient will group construction projects where possible to minimize roadway closures and will develop a maintenance of traffic plan and coordinate with the city's police and fire departments on detour routes and closures.

Safety and Security

25. To minimize risks to safety and human health, construction activities will be performed using qualified personnel trained to use the required equipment properly.
26. The construction site will be secured from public access.
27. All construction activities will be conducted in accordance with the standards specified in the Occupational Safety and Health Administration (OSHA) regulations.

Cultural Resources

28. The subrecipient will monitor ground disturbance during the construction phase. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site shall cease and the subrecipient will notify the coroner's office (in the case of human remains), OEMA, and FEMA. FEMA will then notify the Ohio SHPO and appropriate Tribes.
29. All borrow or fill material must come from pre-existing stockpiles or commercially procured material from a pre-existing source. If this is not the case, the subrecipient shall inform FEMA of the fill source so required agency consultations can be completed and FEMA approval will be required prior to beginning ground disturbing activities.

7 CONSULTATIONS AND REFERENCES

The following agencies were consulted during the preparation of this EA:

7.1 Federal, State, and Local Agencies

- U.S. Army Corps of Engineers, Oak Harbor Field Office, Buffalo District
- U.S. Environmental Protection Agency Region V
- U.S. Fish and Wildlife Service, Ohio Field Office
- Ohio Environmental Protection Agency
- Ohio Department of Natural Resources, Division of Natural Area and Preserves
- Ohio Department of Natural Resources, Environmental Services Division
- Ohio Emergency Management Agency
- Ohio Public Works Commission
- Ohio State Historic Preservation Office
- City of Akron Floodplain Management
- City of Fairlawn Floodplain Management
- Summit Metro Parks

7.2 Tribal Nations

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Shawnee Tribe
- Wyandotte Nation

7.3 References

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8 LIST OF PREPARERS

Federal Emergency Management Agency

Reviewers	Experience and Expertise	Role in Preparation
Duane Castaldi	Regional Environmental Officer	Project Monitor
Maureen Cunningham	Regional Counsel	Legal Review
Nicholas Dorochoff	Deputy Regional Environmental Officer	Technical Monitor
Morgan Holloway	Senior Hazard Mitigation Assistance Specialist	FEMA Region V Staff
Megan Hart	Hazard Mitigation Branch Chief	FEMA Region V Staff

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Preparers	Experience and Expertise	Role in Preparation
Shawn Arden	Water Resources Engineer and Municipal Resources Manager	Water Resources, Floodplain Management
Alex Jensen	Water Resources Engineer	GIS/Graphics
Shannon Mueller	Environmental Scientist	GIS/Graphics
Christy Pirkle	Senior Environmental Scientist	NEPA Documentation/ Technical Review
Melissa Seeley	Environmental Scientist	NEPA Documentation

APPENDICES

Appendix A Maps and Figures

Appendix B Schematic Plans

Appendix C Agency Correspondence

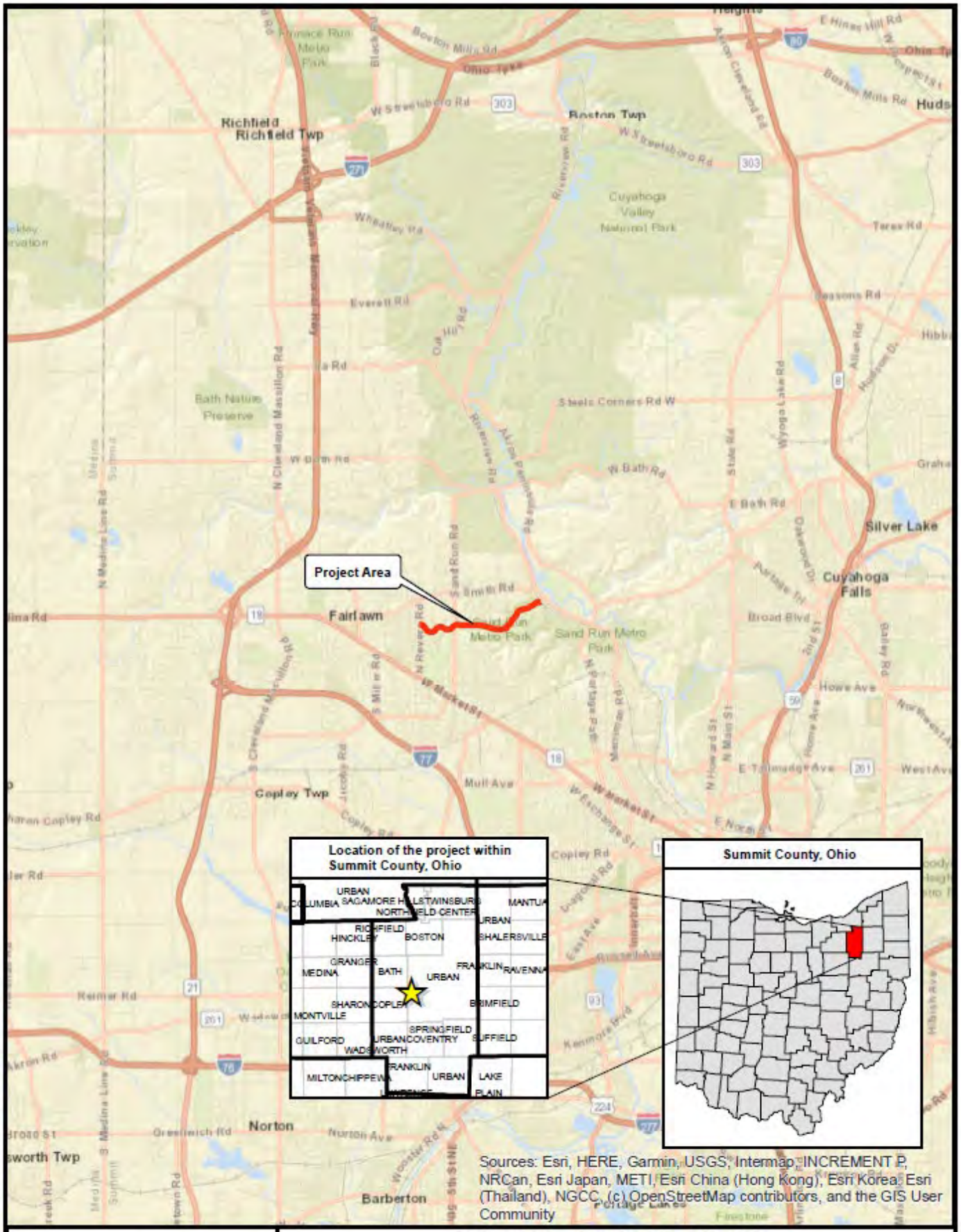
Appendix D Tribal Nation Consultation

Appendix E Floodplain Management Eight-Step Documentation

Appendix F Public Notice & Comments

Appendix A

Maps and Figures



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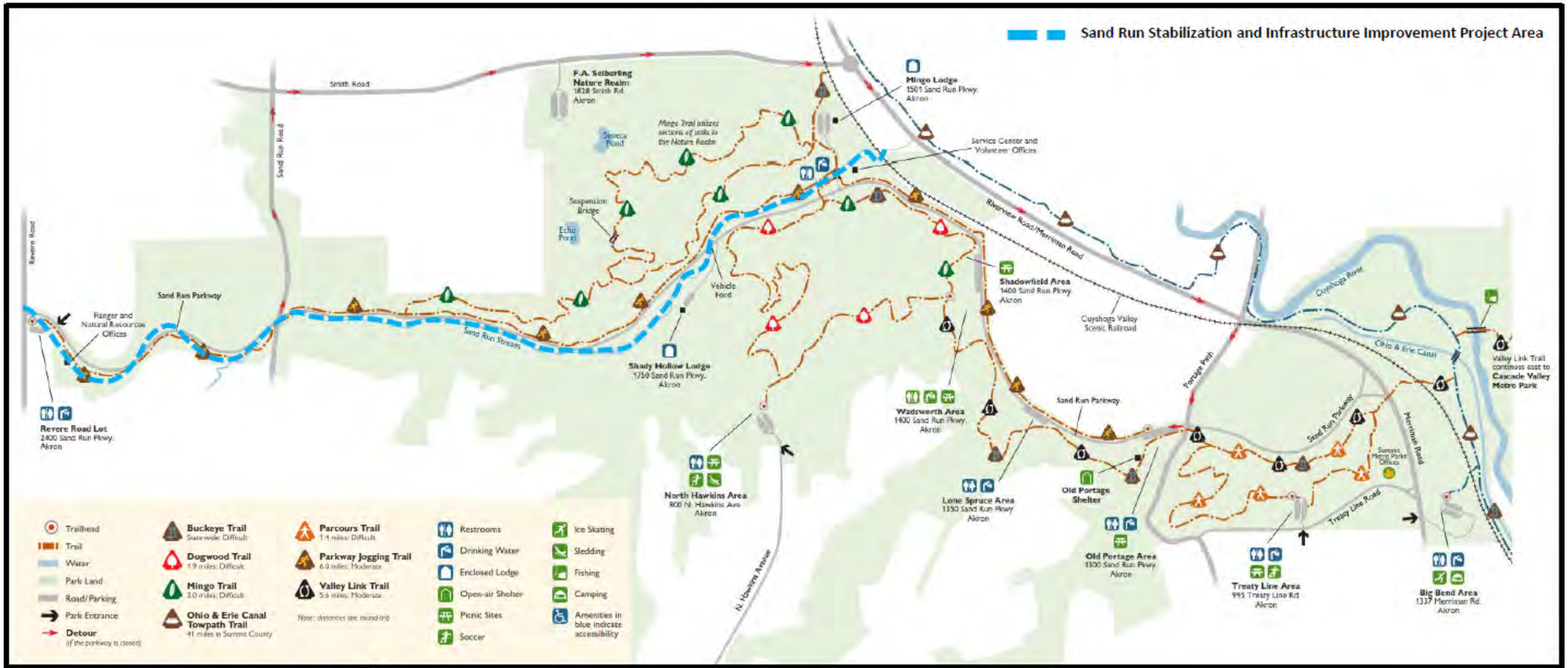
COPLEY & URBAN TOWNSHIPS, SUMMIT COUNTY, OHIO

Sand Run Stabilization and Infrastructure Improvement Project
Location Map
Figure 1

SCALE: 1" = 2 Miles

0 1 2 4 Miles

N



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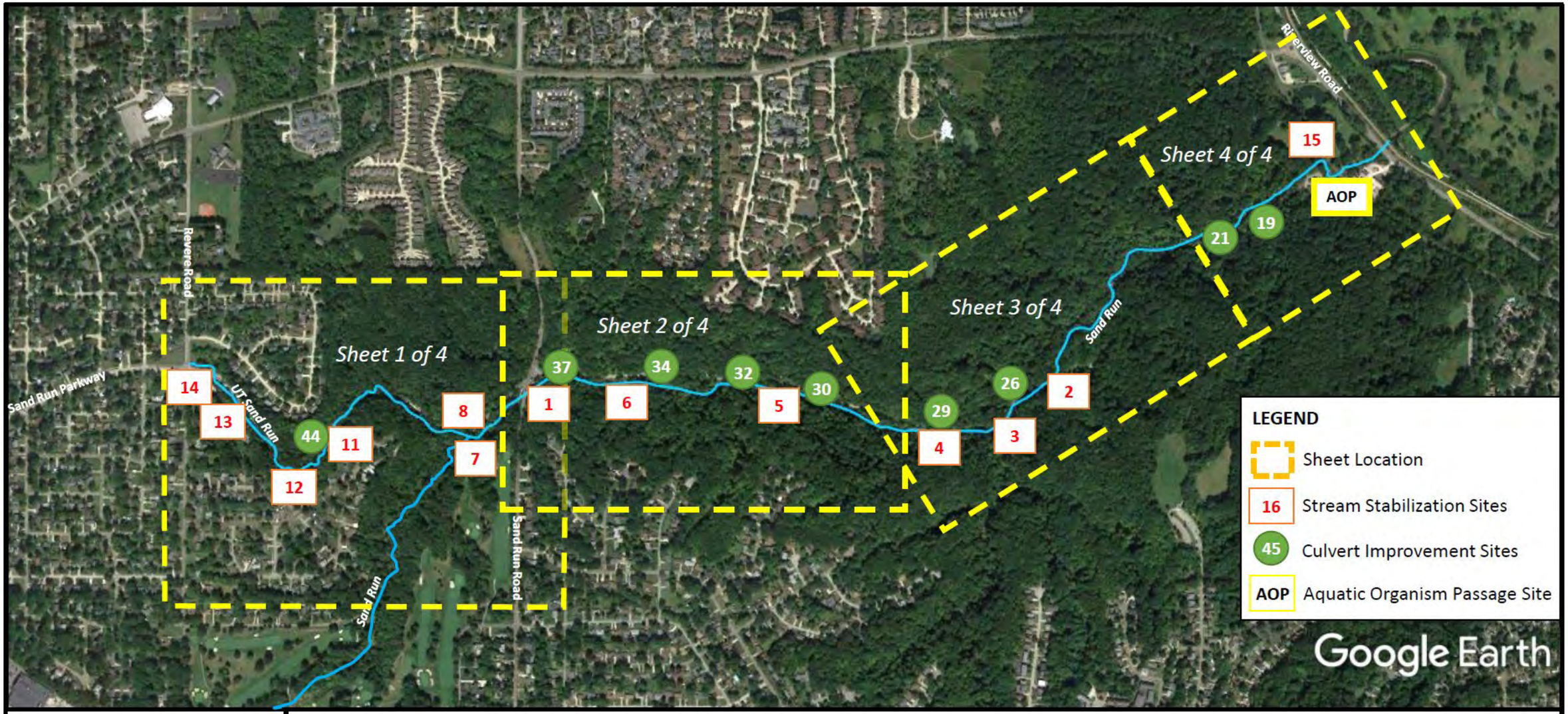
SAND RUN STABILIZATION AND INFRASTRUCTURE IMPROVEMENT PROJECT

Sand Run Metro Park Facilities Map

Figure 2

NO SCALE

SOURCE: https://www.summitmetroparks.org/sand-run-metro-park.aspx



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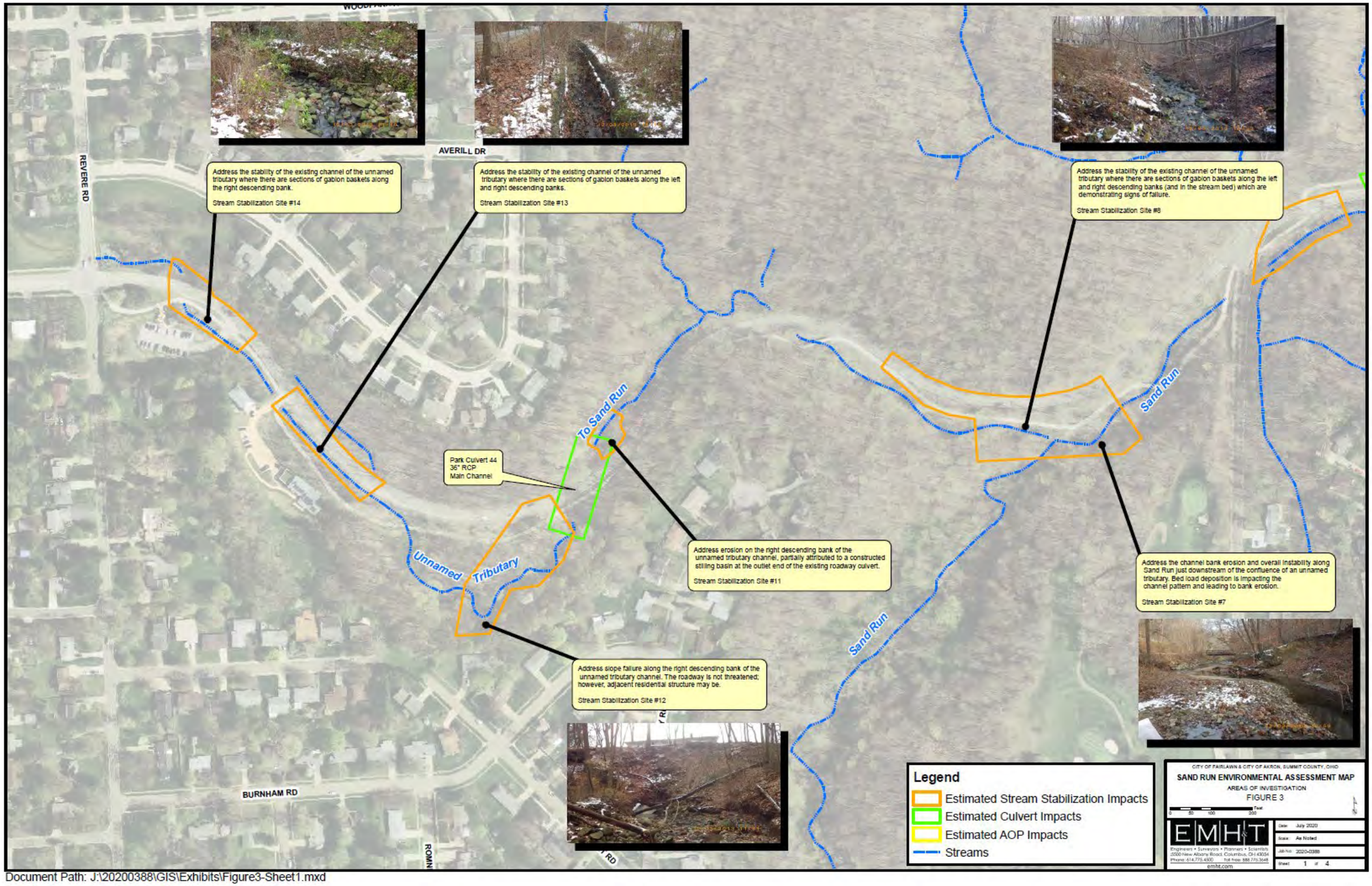
SAND RUN STABILIZATION AND INFRASTRUCTURE IMPROVEMENT PROJECT

Sheet Index

Figure 3

NO SCALE

SOURCE: Google Earth 2019



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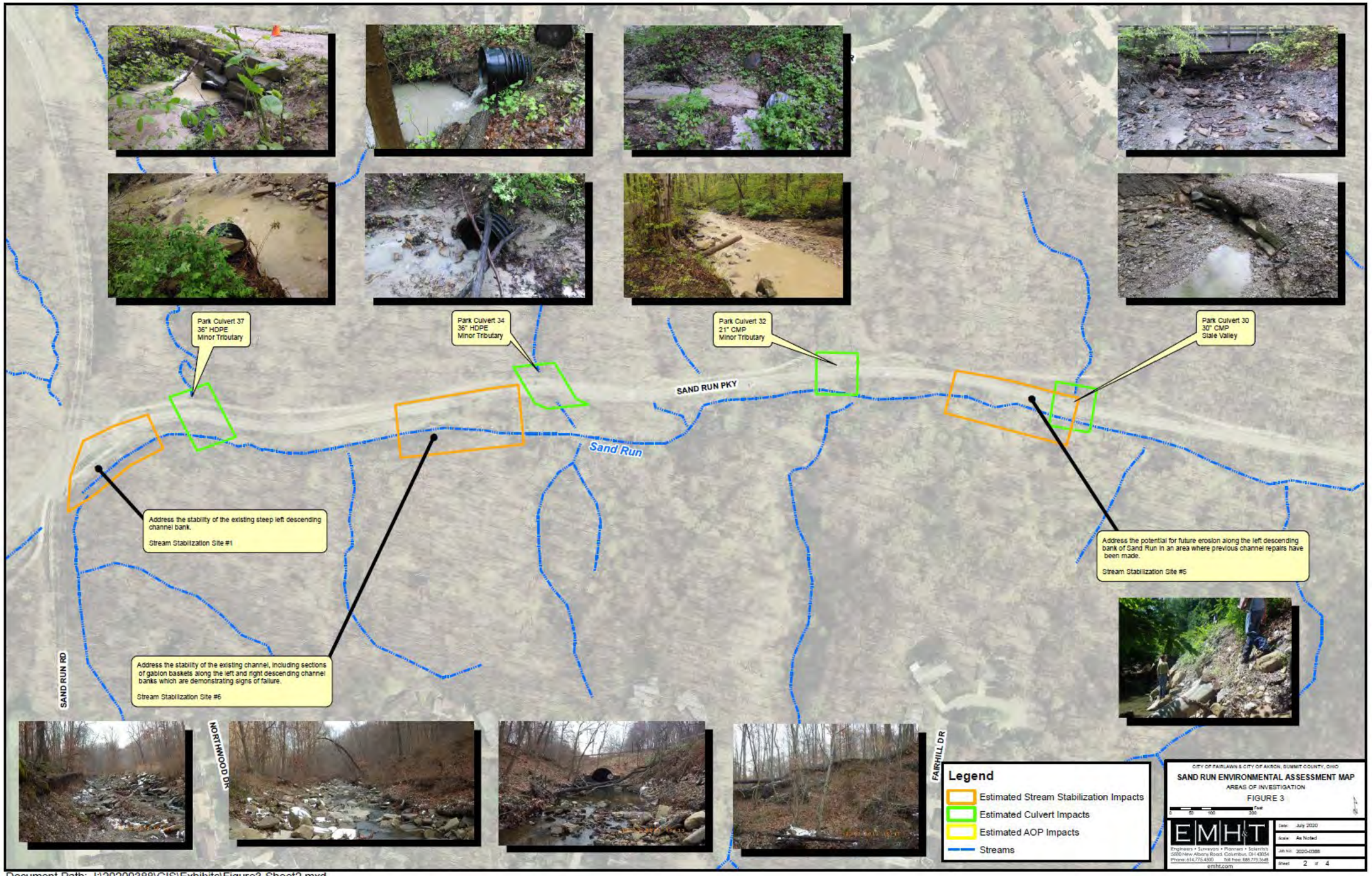

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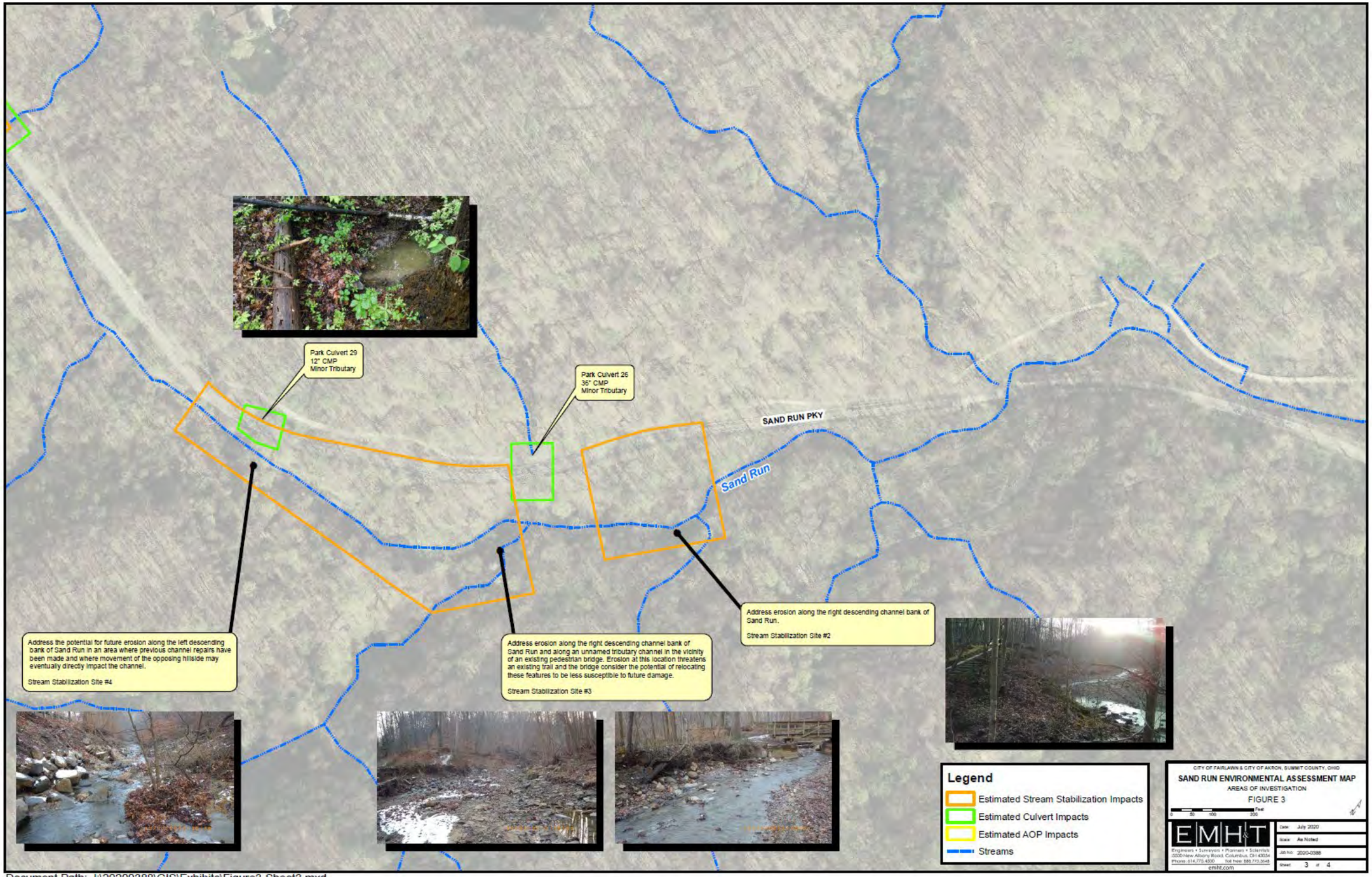

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SMITH RD

Eliminate or modify existing barrier to aquatic organism passage (AOP) located at the downstream side of the railroad bridge, just downstream of Metro Parks' service facility.

AOP #3

Park Culvert 21
Twin 18" CMP
Minor Tributary

Sand Run

Cuyahoga River

SAND RUN PKY

Park Culvert 19
24" HDPE
Minor Tributary

Address erosion on the left and right descending banks of the channel, including erosion along the outside bank at the sharp meanders along the railroad. Stream Stabilization Site #15

RIVERVIEW RD

Legend

- Estimated Stream Stabilization Impacts
- Estimated Culvert Impacts
- Estimated AOP Impacts
- Streams
- Railroad

CITY OF FAIRLAWN & CITY OF AKRON, SUMMIT COUNTY, OHIO

SAND RUN ENVIRONMENTAL ASSESSMENT MAP

AREAS OF INVESTIGATION

EXHIBIT A

0 50 100 200 Feet

N

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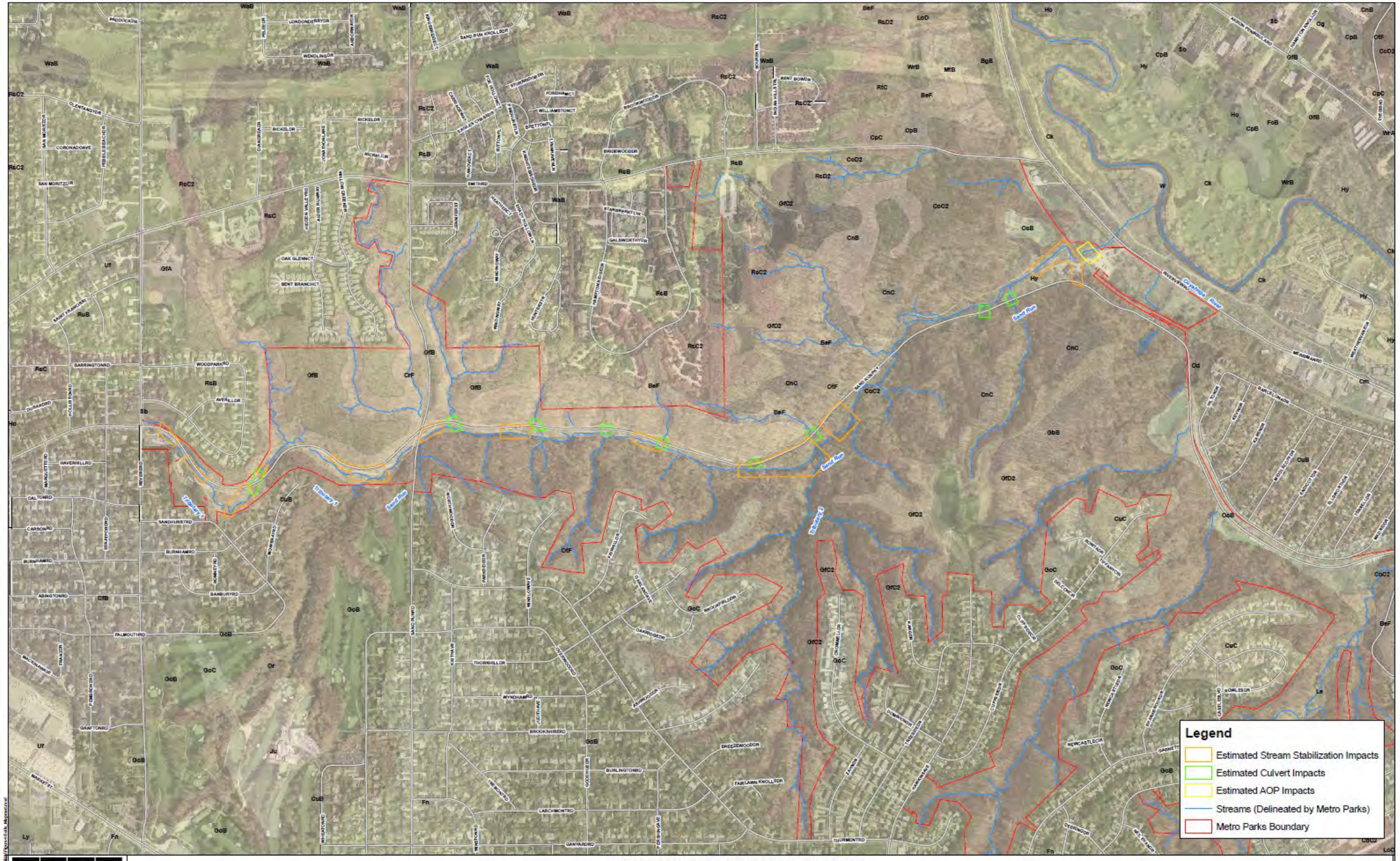

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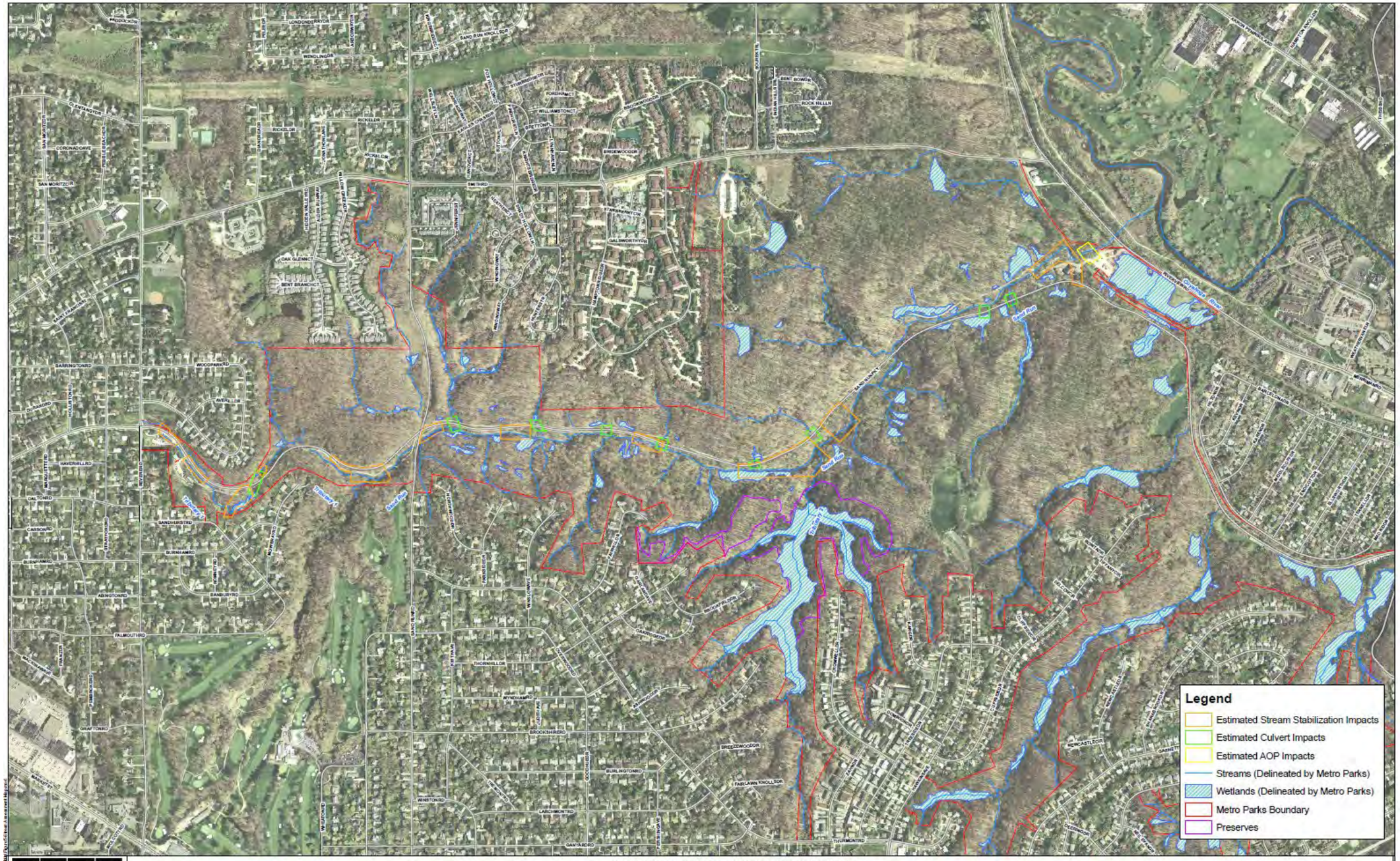
SCALE: 1" = 400'
0 200 400 800 Feet

SUMMIT METRO PARKS, CITY OF FAIRLAWN & CITY OF AKRON, SUMMIT COUNTY, OHIO

SAND RUN PARKWAY IMPROVEMENTS
SOILS MAP
FIGURE 4

N



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SCALE: 1" = 400'
0 200 400 800 Feet

SUMMIT METRO PARKS, CITY OF FAIRLAWN & CITY OF AKRON, SUMMIT COUNTY, OHIO

SAND RUN PARKWAY IMPROVEMENTS
STREAM AND WETLAND ASSESSMENT MAP
FIGURE 5

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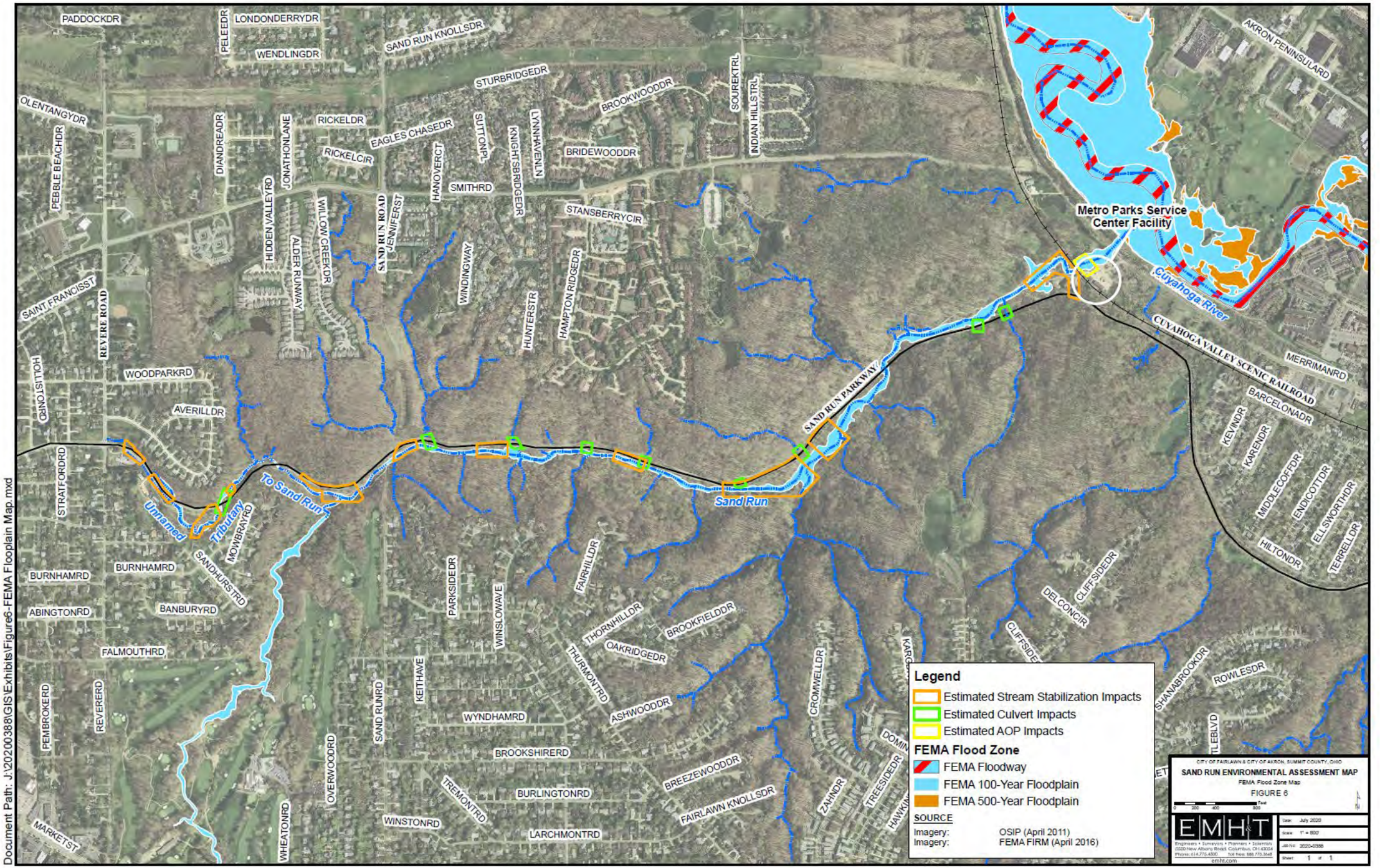
Metro Parks Service Center Facility
Cuyahoga River
Sand Run
To Sand Run
Unnamed Tributary
SAND RUN PARKWAY
CUYAHOGA VALLEY SCENIC RAILROAD
PADDOCKDR
LONDONDERRYDR
WENDLINGDR
SAND RUN KNOLLSDR
STURBRIDGEDR
BROOKWOODDR
SOUREKTRL
INDIAN HILLSTRL
AKRON PENINSULARD
OLENTANGYDR
RICKELDR
EAGLES CHASEDR
RICKELCIR
BRIDEWOODDR
SMITHRD
STANSBERRYCIR
PEBBLE BEACHDR
DIANDREADR
JONATHONLANE
HIDDEN VALLEYRD
ALDER RUNWAY
WILLOW CREEKDR
SAND RUN ROAD
JENNIFERST
HANOVERCT
SUTTONPL
KNIGHTSBRIDGEDR
LYNNHAVENLN
WINDINGWAY
HUNTERSTR
HAMPTON RIDGEDR
SAINT FRANCISST
REVERE ROAD
HOLLISTONRD
WOODPARKRD
AVERILLDR
STRATFORDRD
MERRIMANRD
BARCELONADR
KEVINDR
KARENDR
MIDDLECOFFDR
ENDICOTTDR
ELLSWORTHDR
TERRELLDR
HILTONDR
MOWBRAYRD
SANDHURSTRD
BURNHAMRD
ABINGTONRD
BANBURYRD
FALMOUTHRD
PEMBROKERD
REVERERD
PARKSIDEDR
WINSLOWAVE
FAIRHILLDR
THORNHILLDR
BROOKFIELDDR
OAKRIDGEDR
THURMONTRD
ASHWOODDR
CROMWELLDR
DELCONCIR
CLIFFSIDEDR
CLIFFSIDE
SHANABROOKDR
ROWLESDR
KEITHAVE
SAND RUNRD
WYNDHAMRD
BROOKSHIRERD
OVERWOODRD
BREEZEWOODDR
TREMONTRD
BURLINGTONRD
FAIRLAWN KNOLLSDR
WINSTONRD
LARCHMONTRD
WHEATONRD
MARKETST
ZAHNDR
TREESIDEDR
TLEBLVD
Legend
Estimated Stream Stabilization Impacts
Estimated Culvert Impacts
Estimated AOP Impacts
FEMA Flood Zone
FEMA Floodway
FEMA 100-Year Floodplain
FEMA 500-Year Floodplain
SOURCE
Imagery: OSIP (April 2011)
Imagery: FEMA FIRM (April 2016)
CITY OF FAIRLAWN & CITY OF AKRON, SUMMIT COUNTY, OHIO
SAND RUN ENVIRONMENTAL ASSESSMENT MAP
FEMA Flood Zone Map
FIGURE 6
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Appendix B

Schematic Plans

LEGEND

- EX. MAJOR CONTOUR
- EX. MINOR CONTOUR
- EX. PARCEL LINE
- EX. HYDROGRAPHY
- EX. SAND RUN PARKWAY EOP
- EX. RIGHT-OF-WAY
- EX. GUARD RAIL
- EX. TRAIL
- EX. STORM SEWER
- EX. SANITARY SEWER
- EX. WATER LINE
- EX. GAS LINE
- EX. UNDERGROUND ELECTRIC
- EX. CHANNEL THALWEG
- EX. MANHOILE
- EX. STORM INLET
- FLOW DIRECTION
- EX. BAT TREE
- EX. WETLAND (AS DELINEATED BY METRO PARKS)
- PROPOSED SAND RUN PARKWAY EOP
- PROPOSED CONTOUR
- PROPOSED STORM SEWER
- PROPOSED GUARDRAIL
- PROPOSED SHEET PILE WALL
- PROPOSED WALL
- PROPOSED CHANNEL THALWEG
- PROPOSED NATURAL STONE
- PROPOSED ROCK VANE (SINGLE ARM) WITH POOL
- PROPOSED ROCK VANE WITH POOL
- PROPOSED J-HOOK
- PROPOSED SLOPE

SHEET INDEX

LEGEND – SHEET 1
SITE 1 – SHEET 2
SITE 2 – SHEET 3
SITE 3 – SHEET 4
SITE 4 – SHEETS 5-7
SITE 5 – SHEET 8
SITE 6 – SHEET 9
SITE 7 – SHEET 10
SITE 8 – SHEET 11
SITE 11 – SHEET 12
SITE 12 – SHEET 13
SITE 13 – SHEET 14
SITE 14 – SHEET 15
SITE 15 – SHEETS 16-18
CULVERT 19 – SHEET 19
CULVERT 21 – SHEET 20
CULVERT 26 – SHEET 21
CULVERT 29 – SHEET 22
CULVERT 30 – SHEET 23
CULVERT 32 – SHEET 24
CULVERT 34 – SHEET 25
CULVERT 37 – SHEET 26
CULVERT 44 – SHEET 27
AOP – SHEET 28

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE: April, 2015

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – APPENDIX B
LEGEND

EMH&T
Date: April, 2015
Scale: As Noted

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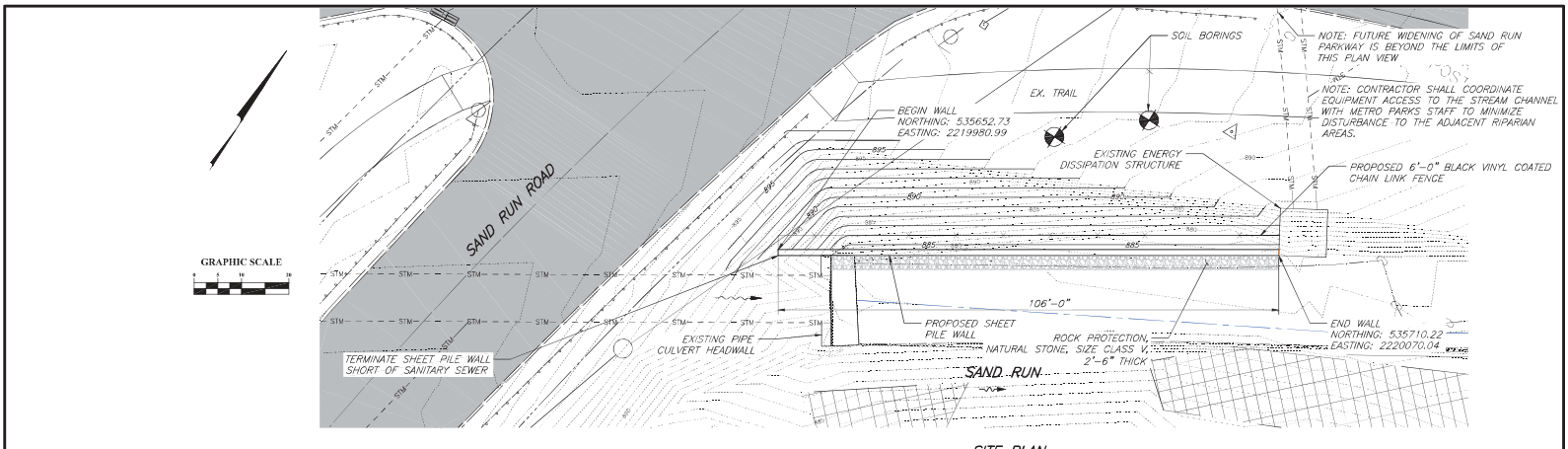
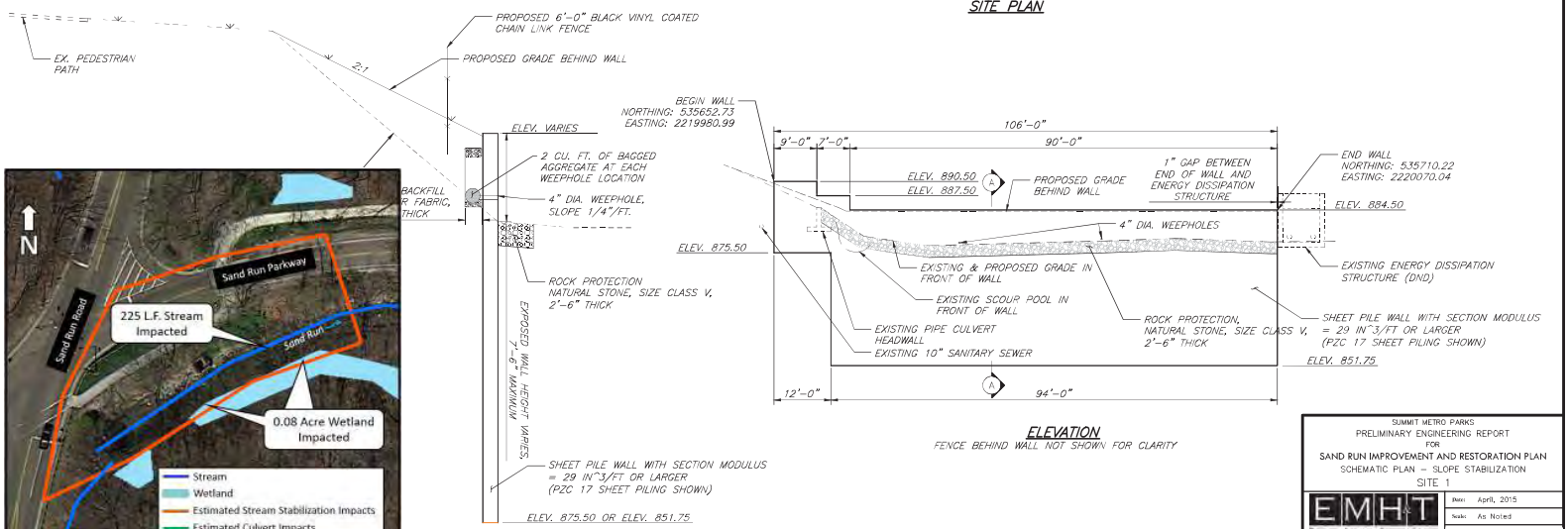


SITE PLAN



ELEVATION
FENCE BEHIND WALL NOT SHOWN FOR CLARITY

SECTION A–A

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 1

EMH&T
Date: April, 2015
Scale: As Noted

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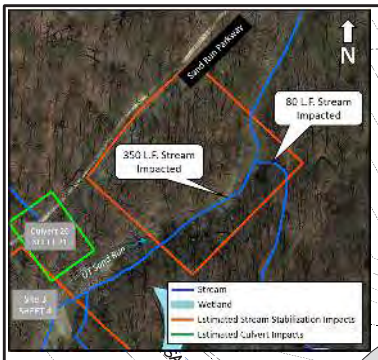


SAND RUN METRO PARK

SAND RUN

PROPOSED ROCK VANE (TYP.)

PROPOSED GRADING (CONTOURS NOT SHOWN)

PROPOSED SINGLE-ARM ROCK VANE (TYP.)

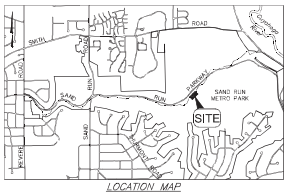
PROPOSED 38' BANKFULL WIDTH

PROPOSED THALWEG REALIGNMENT

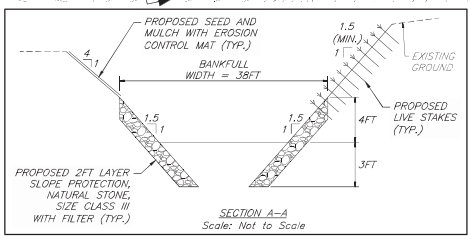
PROPOSED 2FT LAYER SLOPE PROTECTION, NATURAL STONE, SIZE CLASS III WITH FILTER (TYP.)

1.5:1

1.5(MIN.):1



LOCATION MAP



SECTION A–A
Scale: Not to Scale

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

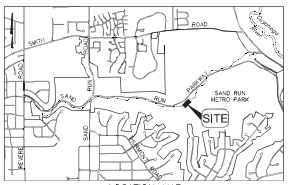
GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 2 – ALTERNATE A

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 3 of 28



LOCATION MAP

SAND RUN METRO PARK

SAND RUN

PROPOSED THALWEG REALIGNMENT

PROPOSED SINGLE-ARM VANE (TYP.)

PROPOSED 2FT LAYER SLOPE PROTECTION NATURAL STONE SIZE CLASS III WITH FILTER

UNNAMED TRIBUTARY

PROPOSED GRADING (CONTOURS NOT SHOWN)

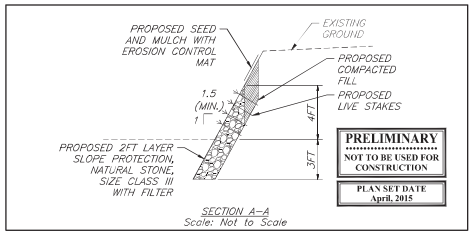
EXISTING TRAIL

PROPOSED 2FT LAYER SLOPE PROTECTION NATURAL STONE SIZE CLASS III WITH FILTER

1.5(MIN.):1

PROPOSED J-HOOK

EXISTING TRIBUTARY BROOK



SECTION A–A
Scale: Not to Scale

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 3 – ALTERNATE A

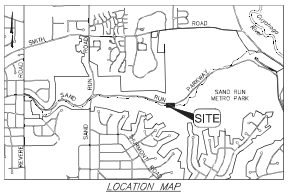
EMHT

Date: April, 2015
Scale: As Noted

Sheet: 4 of 28

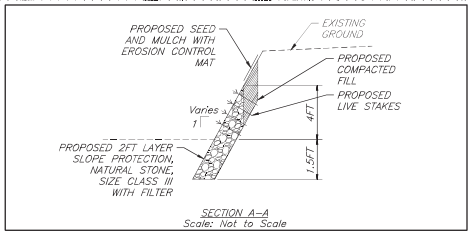
Work limits shown on SHEET 7.

EXISTING 12" CMP STORM SEWER INV. = 834.14
EXISTING TRAIL
EXISTING SANITARY MANHOLE RIM = 859.34 INV. = 829.94
EXISTING 36" SANITARY SEWER
EXISTING 12" CMP STORM SEWER INV. = 823.40
EXISTING 12" CMP STORM SEWER INV. = 829.51
EXISTING 30" SANITARY SEWER
EXISTING GUARDRAIL
PROPOSED SAND RUN PARKWAY EOP
SAND RUN PARKWAY
EXISTING CONCRETE WALL
PROPOSED ROCK VANE (TYP.)
EXISTING 12" CMP STORM SEWER INV. = 821.86
SAND RUN
PROPOSED 2FT LAYER LOCALLY SOURCED FILL NATURAL STONE SIZE CLASS III (TYP.)
SAND RUN METRO PARK
Match Line (See Sheet 6)



LOCATION MAP

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015



SECTION A–A
Scale: Not to Scale

GRAPHIC SCALE

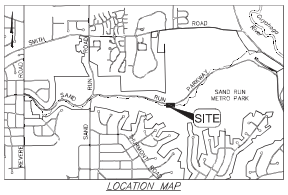
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 4

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 5 of 28

Z:\20130911\Dwg\04Sheets\Exhibits\Slope Stabilization Exhibits\Exhibit 04.dwg Last Saved By: Joramer, 5/4/2015 8:41 AM Last Printed By: Cramer, James, 5/4/2015 8:46 AM (No Xrefs)

Work limits shown on SHEET 7.

SAND RUN PARKWAY
PROPOSED SAND RUN PARKWAY EOP
SAND RUN METRO PARK
Match Line (See Sheet 5)
PROPOSED ROCK VANE (TYP.)
SAND RUN
PROPOSED 2FT LAYER LOCALLY SOURCED FILL NATURAL STONE SIZE CLASS III (TYP.)
RELOCATE EXISTING STONE TO STREAM BANK
Match Line (See Sheet 7)



LOCATION MAP

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015

GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 4

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 6 of 28

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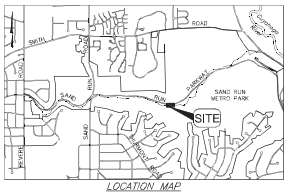
Match Line (See Sheet 6)

SAND RUN

PROPOSED 2FT LAYER LOCALLY SOURCED FILL NATURAL STONE SIZE CLASS III (TYP.)

EXISTING TRAIL

SAND RUN METRO PARK



LOCATION MAP

GRAPHIC SCALE

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 4

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 7 of 28

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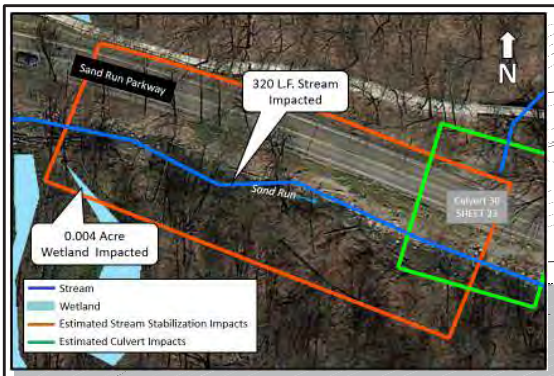


EXISTING TRAIL

EXISTING 96" CMP STORM SEWER INV. = 840.80

EXISTING 30" SANITARY SEWER

SAND RUN PARKWAY

PROPOSED SAND RUN PARKWAY EOP

EXISTING 30" CMP STORM SEWER INV. = 837.43

PROPOSED ROCK VANE (TYP.)

EXISTING CONCRETE WALL

SAND RUN

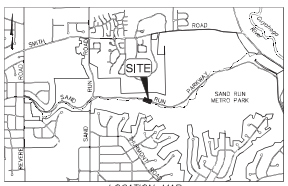
SAND RUN

PROPOSED 2FT LAYER LOCALLY SOURCED FILL NATURAL STONE, SIZE CLASS III (TYP.)

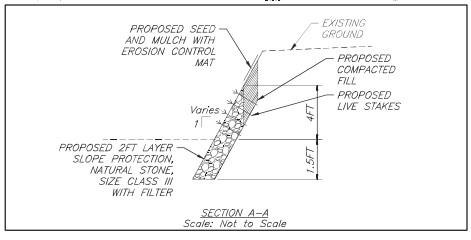
PROPOSED THALWEG REALIGNMENT

RELOCATE EXISTING STONE TO STREAM BANK

SAND RUN METRO PARK



LOCATION MAP



SECTION A–A
Scale: Not to Scale

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 5

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 8 of 28

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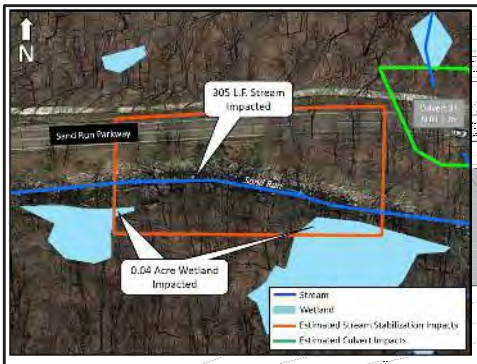
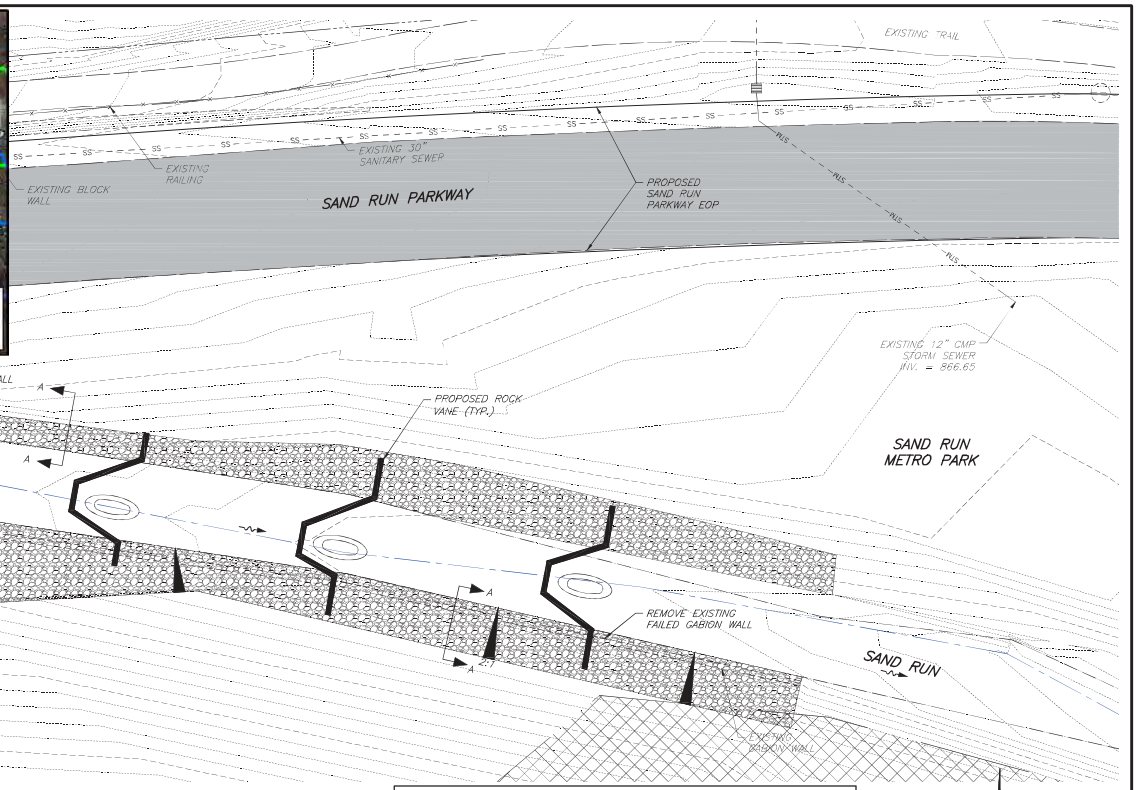
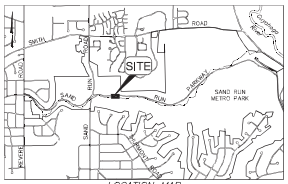
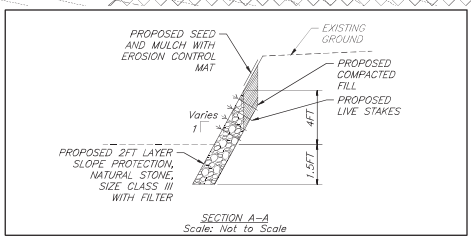






LOCATION MAP

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015



SECTION A–A
Scale: Not to Scale

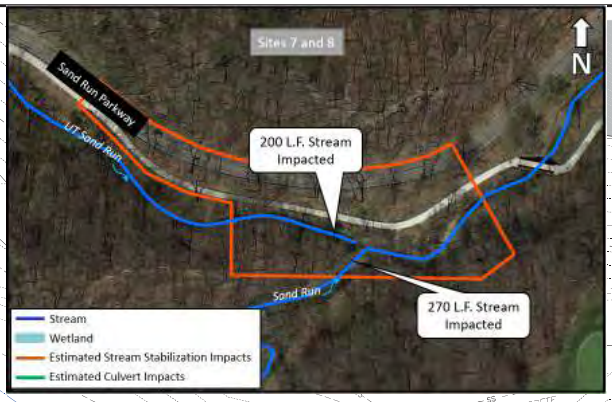
GRAPHIC SCALE

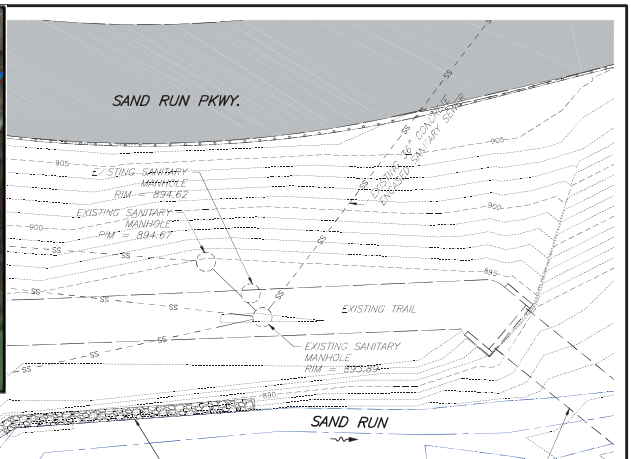
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 6 – ALTERNATE A

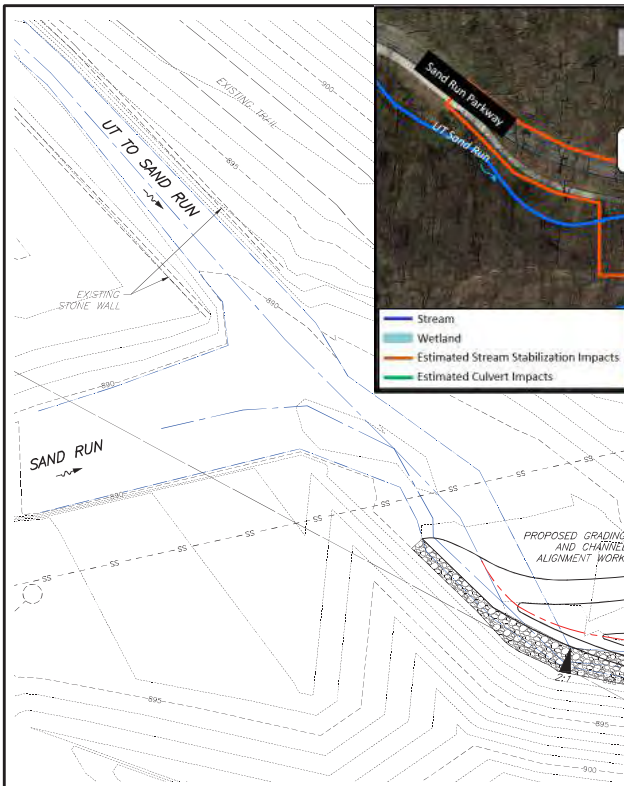
EMHT

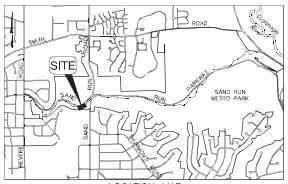
Date: April, 2015
Scale: As Noted

Sheet: 9 of 28



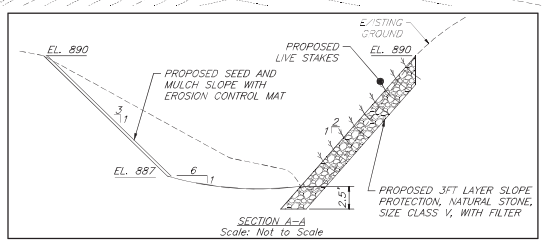






LOCATION MAP

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015



SECTION A–A
Scale: Not to Scale

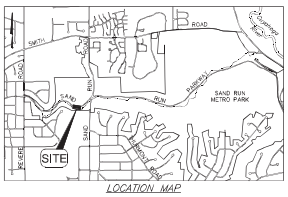
GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 7 – ALTERNATE A

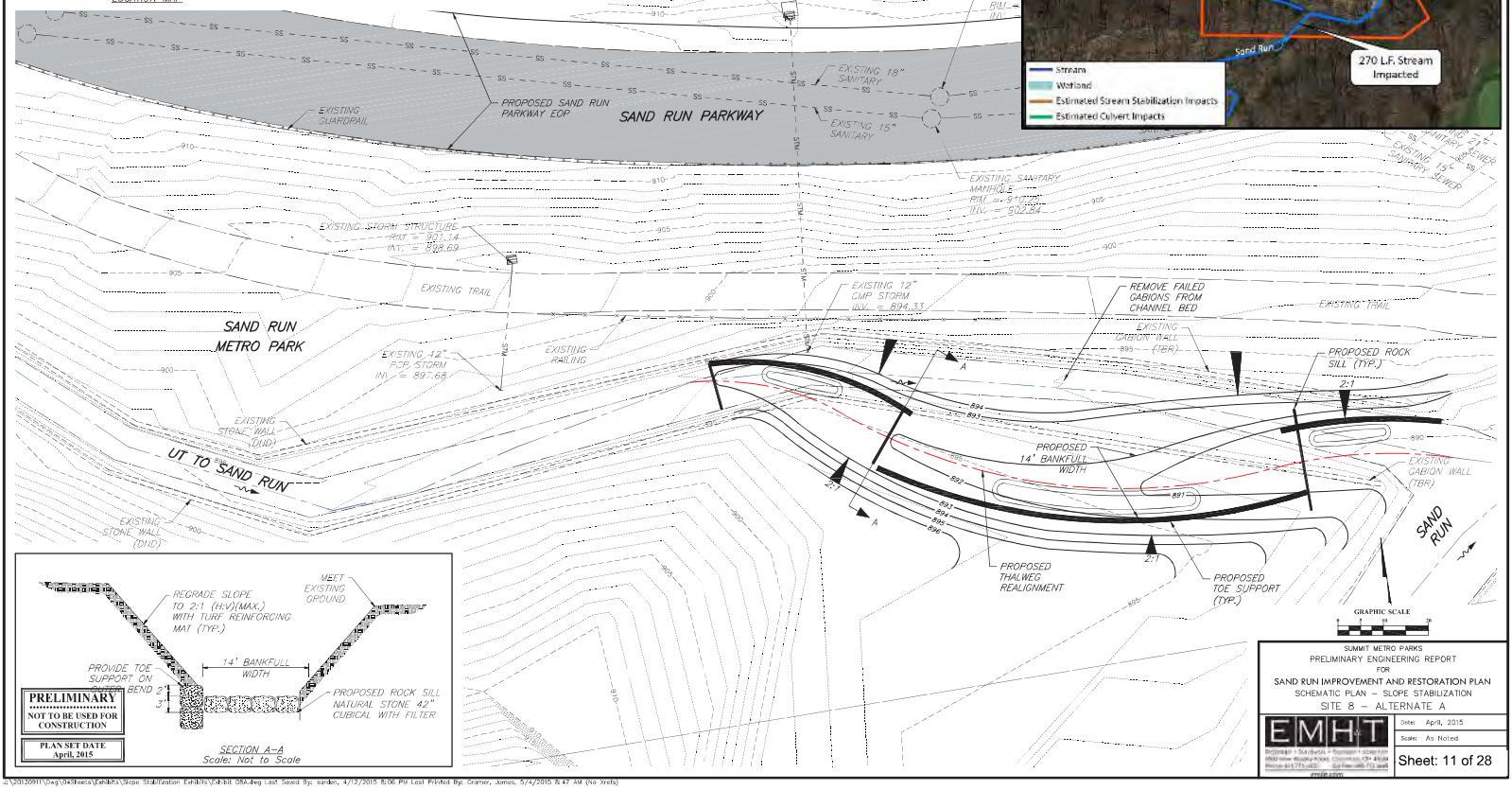
EMHT

Date: April, 2015
Scale: As Noted

Sheet: 10 of 28



LOCATION MAP



SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 8 – ALTERNATE A

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 11 of 28

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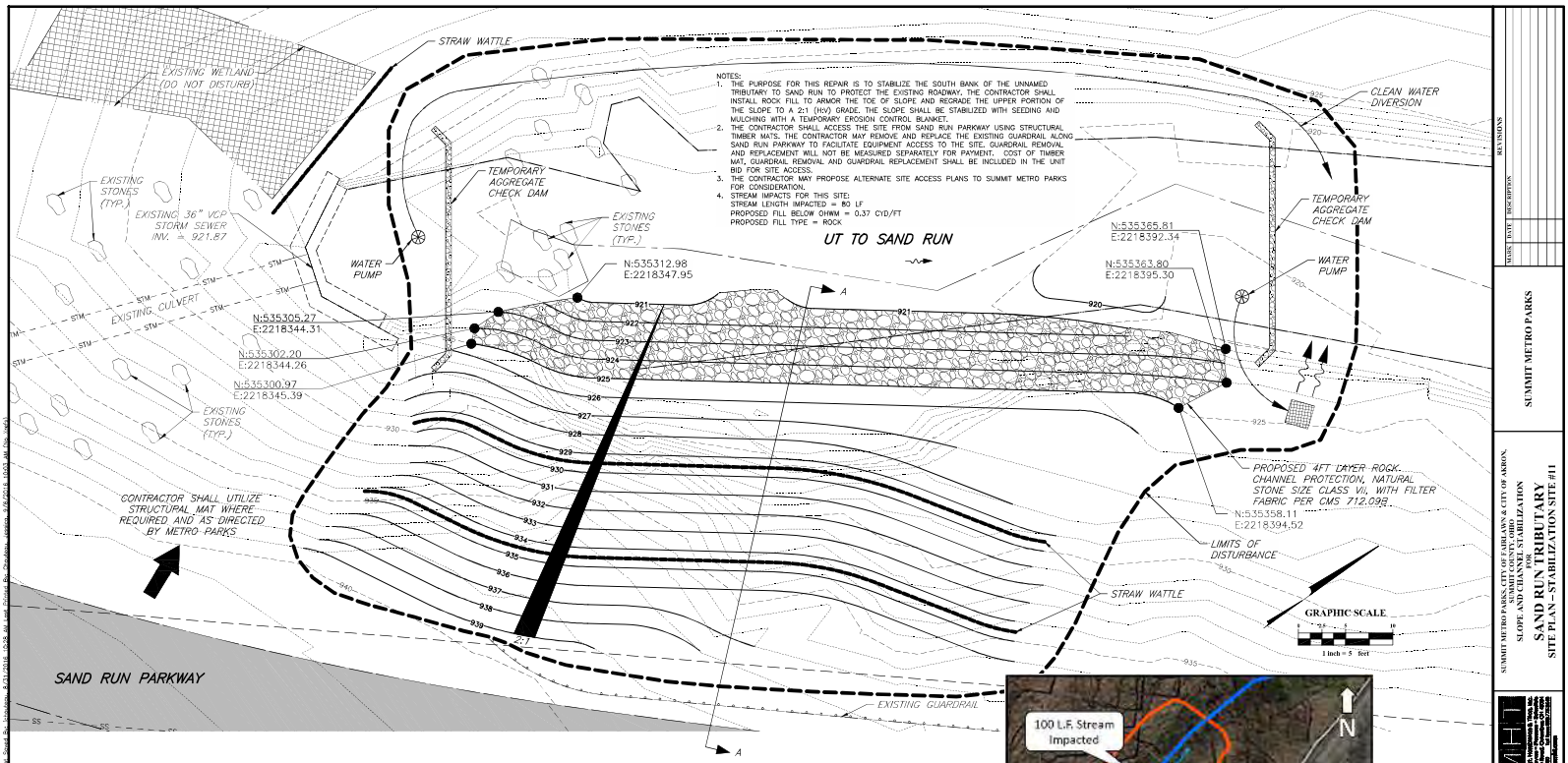
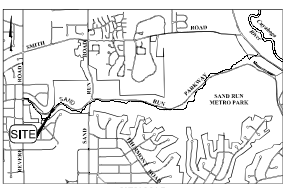
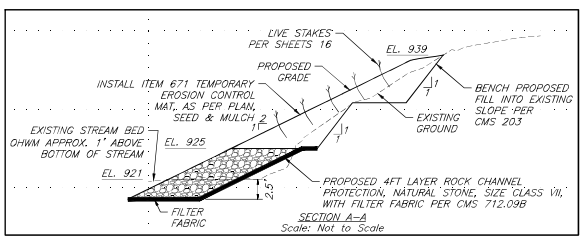
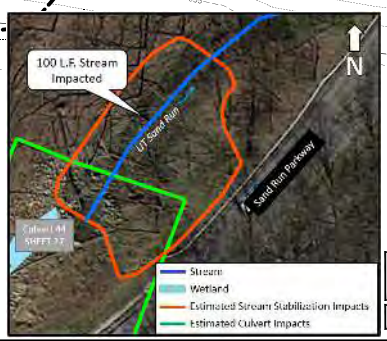




KEY MAP
SCALE: 1" = 2000'





PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
September 2016

REVISIONS

MARK	DATE	DESCRIPTION

SUMMIT METRO PARKS

SUMMIT METRO PARKS, CITY OF FAIRLAWN & CITY OF AKRON, OHIO
SLOPE AND CHANNEL STABILIZATION
FOR
SAND RUN TRIBUTARY
SITE PLAN - STABILIZATION SITE #11

EMHT

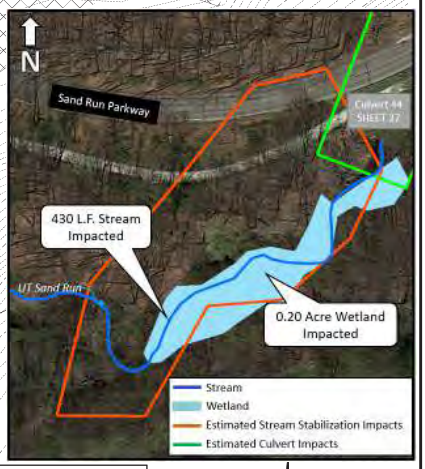
DATE: September 2016
SCALE: 1" = 5'
JOB NO.: 2015-1417
SHEET: 12 of 28

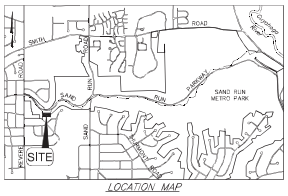
EXISTING 12" VP STORM SEWER INV. = 939.95

UT TO SAND RUN

UT TO SAND RUN

PROPOSED LOCALLY SOURCED FILL NATURAL STONE, SIZE CLASS VII

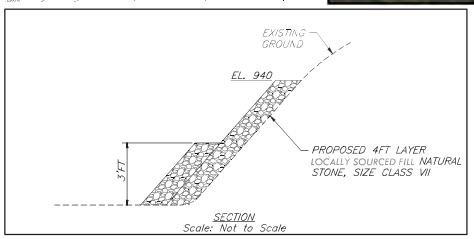




LOCATION MAP

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015



SECTION
Scale: Not to Scale

GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 12 – ALTERNATE B

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 13 of 28

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EXISTING 15" SANITARY SEWER

EXISTING STORM STRUCTURE RIM = 955.72 INV. = 952.80

EXISTING SANITARY MANHOLE RIM = 955.78 INV. = 949.29

SAND RUN PARKWAY

EXISTING 21" SANITARY SEWER

EXISTING 15" SANITARY SEWER

PROPOSED SAND RUN PARKWAY EOP

EXISTING 12" CPP STORM SEWER INV. = 951.80

UT TO SAND RUN

EXISTING GABION WALL

PROPOSED TOE REPAIR (ALT-A&B) OR REMOVE GABIONS AND REPLACE WITH PRECAST STACKABLE CONCRETE BLOCK WALL (ALT-C)

UT TO SAND RUN

EXISTING 10'x5' BOX CULVERT

EXISTING GABION WALL

EXISTING 10'x5' BOX CULVERT INV. = 948.16

EXISTING 10'x5' BOX CULVERT INV. = 947.80

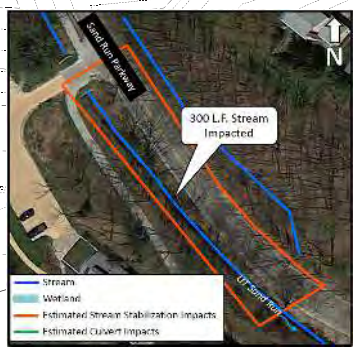
EXISTING 18" CONCRETE STORM CULVERT INV. = 951.77

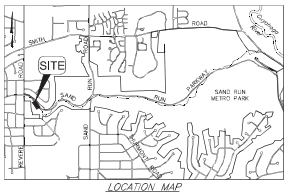
EXISTING DRIVE

EXISTING TRAIL

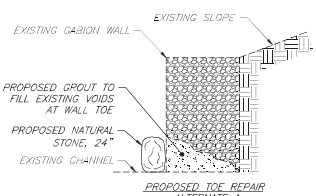
EXISTING SANITARY LATERAL

EXISTING 18" CONCRETE STORM CULVERT INV. = 952.39

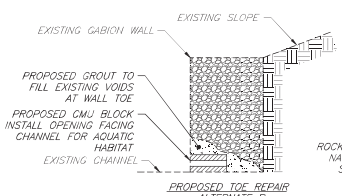




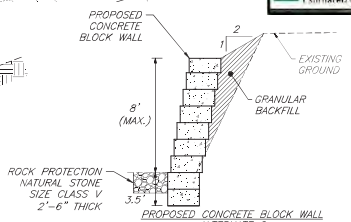
LOCATION MAP



PROPOSED TOE REPAIR ALTERNATE A



PROPOSED TOE REPAIR ALTERNATE B



PROPOSED CONCRETE BLOCK WALL ALTERNATE C

GRAPHIC SCALE

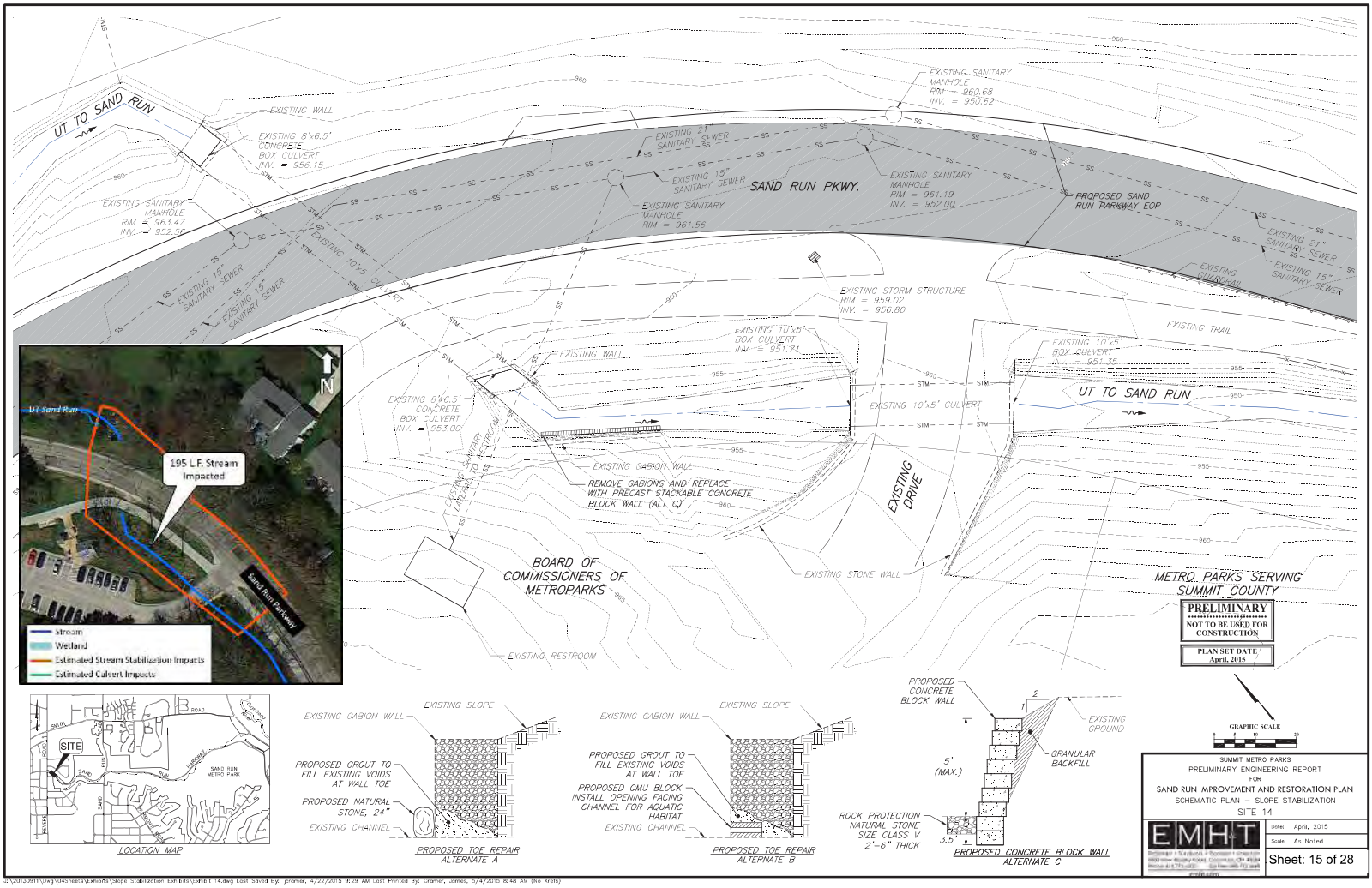
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 13

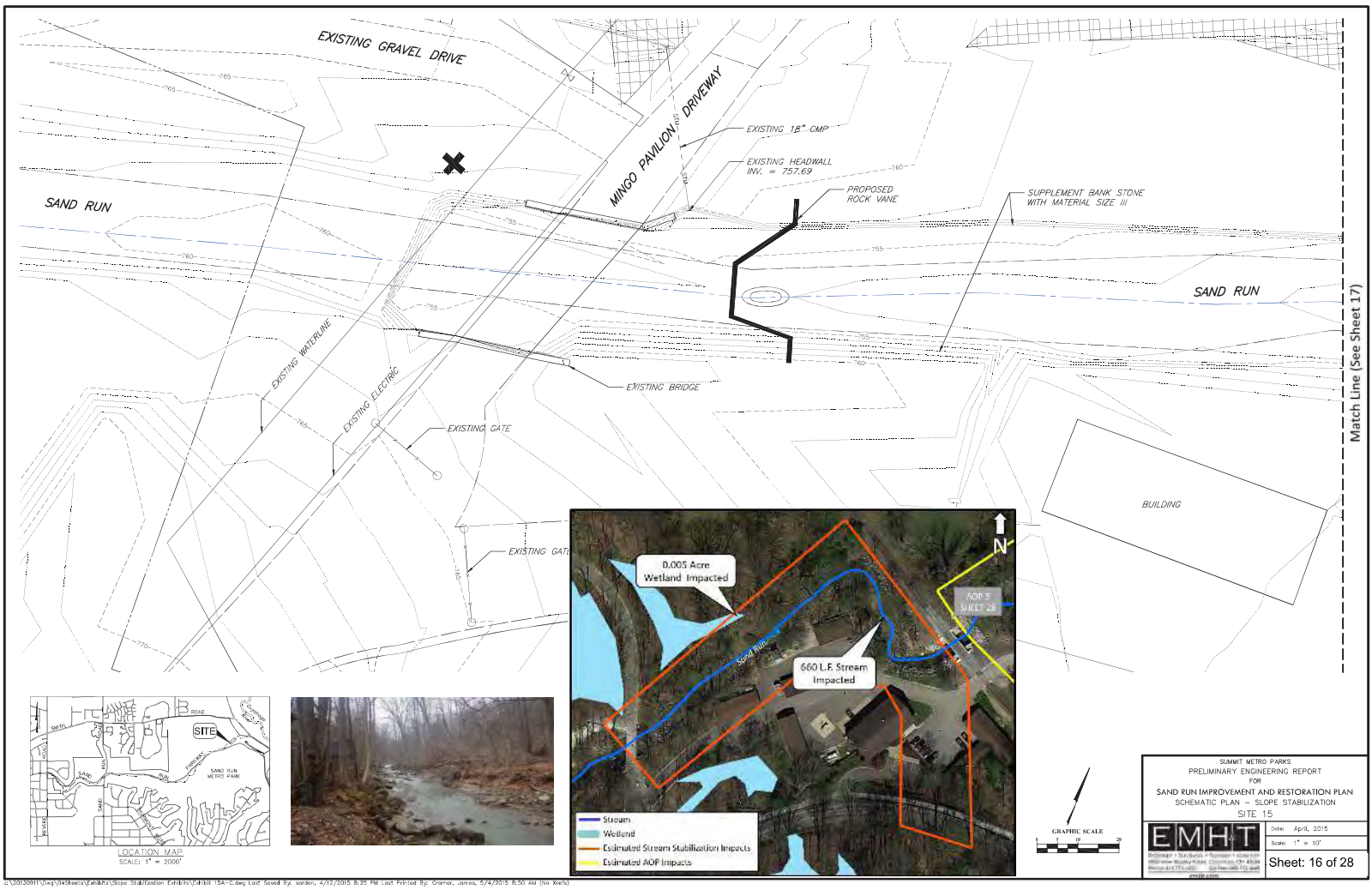
EMHT

Date: April, 2015
Scale: As Noted

Sheet: 14 of 28

I:\20130911\Dwg\04Sheets\Exhibits\Slope Stabilization Exhibits\Exhibit 13.dwg Last Saved By: jcromer, 4/22/2015 9:29 AM Last Printed By: Cromer, James, 5/4/2015 8:48 AM (No Xrefs)


UT TO SAND RUN
EXISTING WALL
EXISTING 8'x6.5' CONCRETE BOX CULVERT INV. = 956.15
EXISTING SANITARY MANHOLE RIM = 963.47 INV. = 952.56
EXISTING 15" SANITARY SEWER
EXISTING 10'x5' BOX CULVERT
EXISTING SANITARY MANHOLE RIM = 960.68 INV. = 950.62
EXISTING 21" SANITARY SEWER
EXISTING 15" SANITARY SEWER
SAND RUN PKWY.
EXISTING SANITARY MANHOLE RIM = 961.19 INV. = 952.00
EXISTING SANITARY MANHOLE RIM = 961.56
PROPOSED SAND RUN PARKWAY EOP
EXISTING STORM STRUCTURE RIM = 959.02 INV. = 956.80
EXISTING 10'x5' BOX CULVERT INV. = 951.71
EXISTING TRAIL
EXISTING 10'x5' BOX CULVERT INV. = 951.36
EXISTING 8'x6.5' CONCRETE BOX CULVERT INV. = 953.00
EXISTING SANITARY LATERAL TO RESTROOM
EXISTING GABION WALL
REMOVE GABIONS AND REPLACE WITH PRECAST STACKABLE CONCRETE BLOCK WALL (ALT C)
EXISTING DRIVE
EXISTING STONE WALL
BOARD OF COMMISSIONERS OF METROPARKS
EXISTING RESTROOM
METRO PARKS SERVING SUMMIT COUNTY
PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE April, 2015
N
UT Sand Run
195 L.F. Stream Impacted
Sand Run Parkway
Stream
Wetland
Estimated Stream Stabilization Impacts
Estimated Culvert Impacts
SITE
SAND RUN METRO PARK
LOCATION MAP
EXISTING SLOPE
PROPOSED GROUT TO FILL EXISTING VOIDS AT WALL TOE
PROPOSED NATURAL STONE, 24"
EXISTING CHANNEL
PROPOSED TOE REPAIR ALTERNATE A
PROPOSED GROUT TO FILL EXISTING VOIDS AT WALL TOE
PROPOSED CMU BLOCK INSTALL OPENING FACING CHANNEL FOR AQUATIC HABITAT
PROPOSED TOE REPAIR ALTERNATE B
PROPOSED CONCRETE BLOCK WALL
EXISTING GROUND
GRANULAR BACKFILL
5' (MAX.)
ROCK PROTECTION NATURAL STONE SIZE CLASS V 2'-6" THICK
3.5'
PROPOSED CONCRETE BLOCK WALL ALTERNATE C
GRAPHIC SCALE
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 14
EMHT
Date: April, 2015
Scale: As Noted
Sheet: 15 of 28


EXISTING GRAVEL DRIVE
MINGO PAVILION DRIVEWAY
EXISTING 18" CMP
EXISTING HEADWALL INV. = 757.69
PROPOSED ROCK VANE
SUPPLEMENT BANK STONE WITH MATERIAL SIZE III
SAND RUN
EXISTING WATERLINE
EXISTING ELECTRIC
EXISTING GATE
EXISTING BRIDGE
BUILDING
Match Line (See Sheet 17)
0.005 Acre Wetland Impacted
660 L.F. Stream Impacted
AOP 3 SHEET 28
Stream
Wetland
Estimated Stream Stabilization Impacts
Estimated AOP Impacts
SITE
SAND RUN METRO PARK
LOCATION MAP
SCALE: 1" = 2000'
GRAPHIC SCALE
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 15
EMHT
Date: April, 2015
Scale: 1" = 10'
Sheet: 16 of 28

Work limits shown on SHEET 16.

Match Line (See Sheet 16)

EXISTING OVERHEAD ELECTIC LINE

PROPOSED ROCK VANE

SUPPLEMENT BANK STONE WITH MATERIAL SIZE III

PROPOSED SINGLE-ARM ROCK VANE (TYP.)

PROPOSED 2FT LAYER SLOPE PROTECTION NATURAL STONE SIZE CLASS III WITH FILTER

SAND RUN

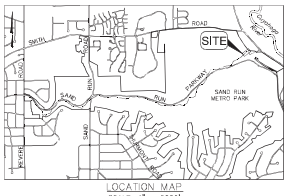
CUYAHOGA VALLEY SCENIC RAILROAD

EXISTING UNDERGROUND TELEPHONE LINE

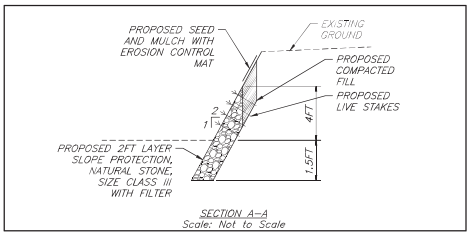
BUILDING

BUILDING

SAND RUN



LOCATION MAP
SCALE: 1" = 2000'



SECTION A–A
Scale: Not to Scale

Match Line (See Sheet 18)

NOTE: THIS WORK WILL REQUIRE COORDINATION WITH THE RAILROAD

GRAPHIC SCALE

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 15

EMHT

Date: April, 2015
Scale: 1" = 10'

Sheet: 17 of 28

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Match Line (See Sheet 17)

Work limits shown on SHEET 16.

EXISTING OVERHEAD ELECTIC LINE

PROPOSED 2FT LAYER SLOPE PROTECTION NATURAL STONE SIZE CLASS III WITH FILTER

SUPPLEMENT BANK STONE WITH MATERIAL SIZE III

EXISTING UNDERGROUND TELEPHONE LINE

EXISTING UNDERGROUND TELEPHONE LINE

EXISTING HEADWALL INV. = 751.55

PROPOSED SINGLE-ARM ROCK VANE (TYP.)

EXISTING HEADWALL INV. = 754.63

EXISTING 12" CMP

SAND RUN

EXISTING INV. = 749.65

EXISTING INV. = 749.75

EXISTING HEADWALL INV. = 756.24

BUILDING

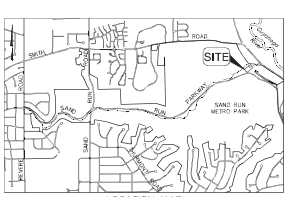
EXISTING DRIVE

EXISTING BENCHMARK

CUYAHOGA VALLEY SCENIC RAILROAD

EXISTING RAILROAD BRIDGE

ASPHALT DRIVE



LOCATION MAP
SCALE: 1" = 2000'

GRAPHIC SCALE

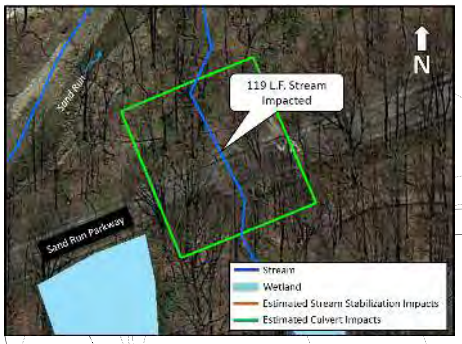
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN – SLOPE STABILIZATION
SITE 15

EMHT

Date: April, 2015
Scale: 1" = 10'

Sheet: 18 of 28

Z:\20130911\Dwg\04Sheets\Exhibits\Slope Stabilization Exhibits\Exhibit 15A-C.dwg Last Saved By: sorden, 4/12/2015 8:25 PM Last Printed By: Cramer, James, 5/4/2015 8:50 AM (No Xrefs)

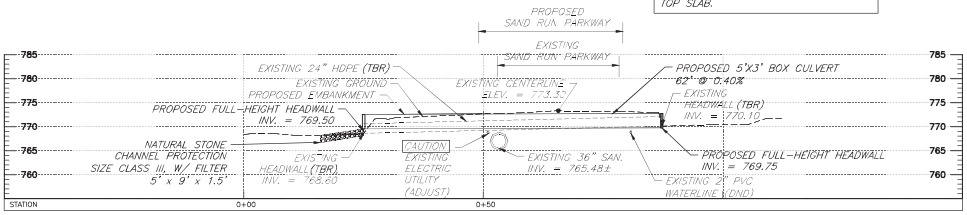


LOCATION MAP

HYDRAULIC DESIGN DATA	
DRAINAGE AREA: 23.8 Ac.	
Q(25): 51 CFS	Q(100): 78 CFS
HW(25): 772.0	HW(100): 772.8
TW(25): 768.1	TW(100): 768.9
V(25): 7.3 FPS	V(100): 8.3 FPS

NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.

NOTE: DESIGN MAY REQUIRE PAVEMENT SURFACE COURSE TO BE RAISED AND INSTALLED DIRECTLY ON BOX CULVERT TOP SLAB.



NOTE: EXISTING CULVERT APPEARS TO REST ON SANITARY SEWER. EXPOSE AND ENCASE SANITARY SEWER IN CONCRETE 10' EACH SIDE OF CROSSING.

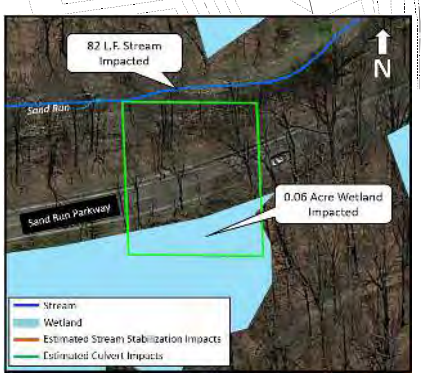
PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
December, 2014

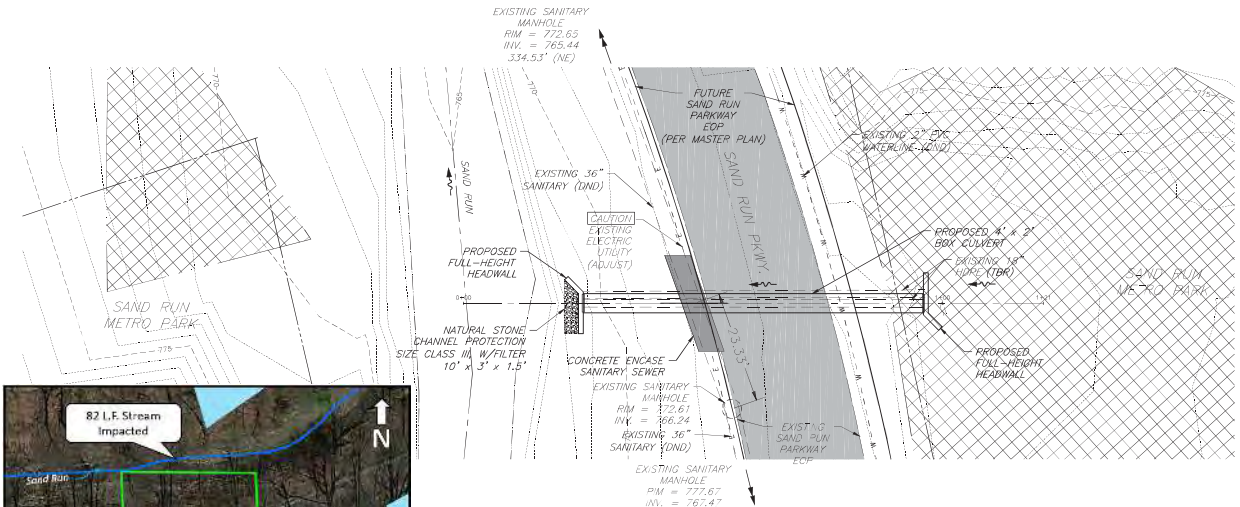
GRAPHIC SCALE
0 5 10 20

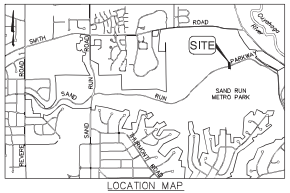
SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #19

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 19 of 28

I:\20130911\Dwg\04Sheets\Exhibits\Culvert Exhibits\Fork Culvert 19.dwg Last Saved By: sarden, 4/12/2015 7:11 PM Last Printed By: Arden, Shawn, 4/12/2015 7:23 PM (No Xrefs)





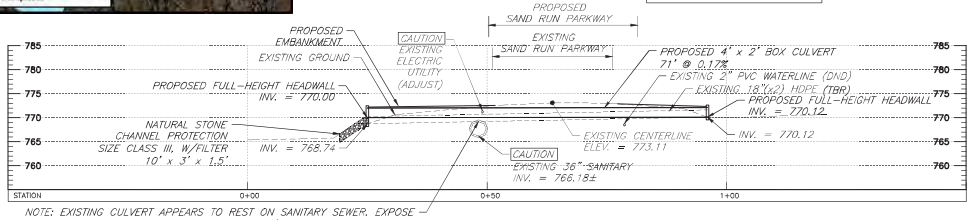


LOCATION MAP

HYDRAULIC DESIGN DATA	
DRAINAGE AREA: 9.2 Ac.	
Q(25): 20 CFS	Q(100): 30 CFS
HW(25): 771.7	HW(100): 772.9
TW(25): 771.2	TW(100): 772.5
V(25): 4.2 FPS	V(100): 5.8 FPS

NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.

NOTE: DESIGN MAY REQUIRE PAVEMENT SURFACE COURSE TO BE INSTALLED DIRECTLY ON BOX CULVERT TOP SLAB.



NOTE: EXISTING CULVERT APPEARS TO REST ON SANITARY SEWER. EXPOSE AND ENCASE SANITARY SEWER IN CONCRETE 10' EACH SIDE OF CROSSING.

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015

GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #21

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 20 of 28

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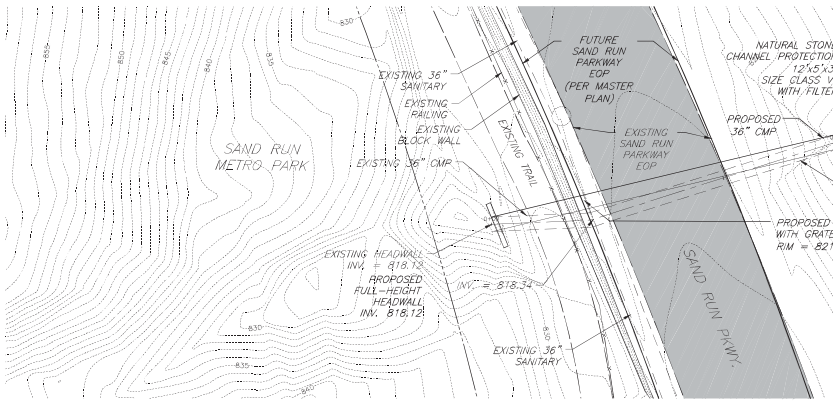
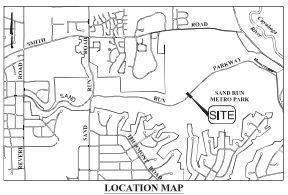
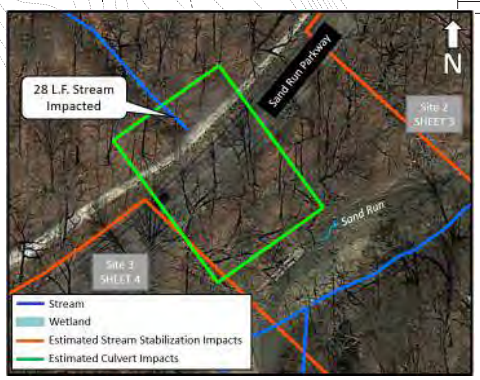
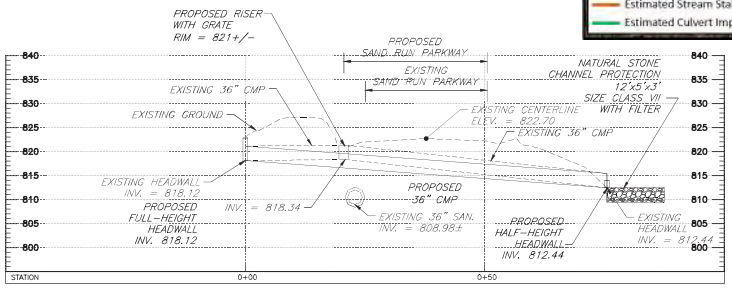




LOCATION MAP

HYDRAULIC DATA	
DRAINAGE AREA: 29.7 Ac.	
Q(25): 63 CFS	Q(100): 94 CFS
HW(25): 823.1	HW(100): 825.7
TW(25): 802.1	TW(100): 803.0
V(25): 15 FPS	V(100): 16 FPS





PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #26

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 21 of 28

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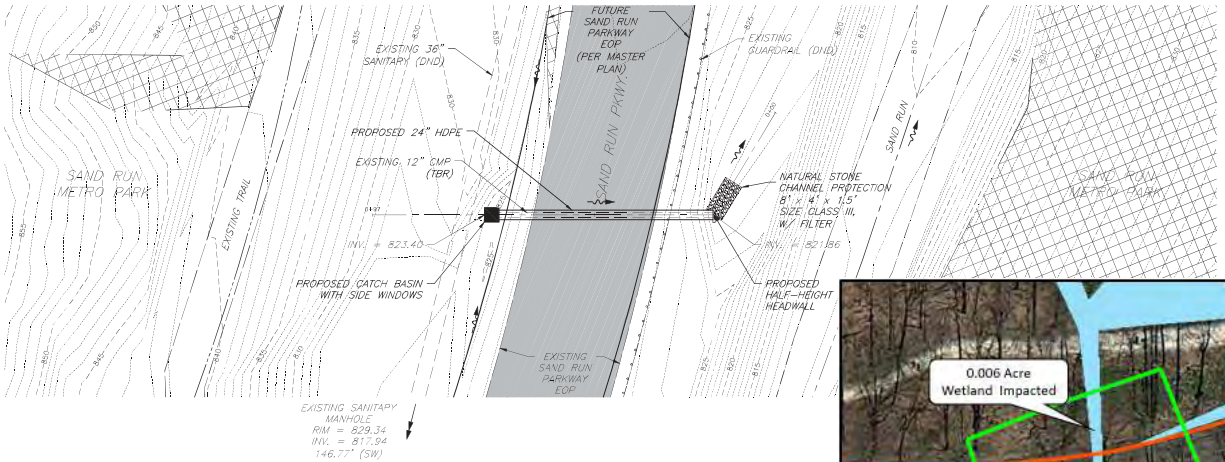
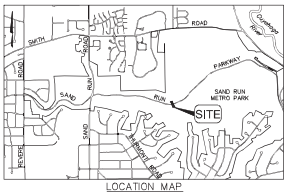
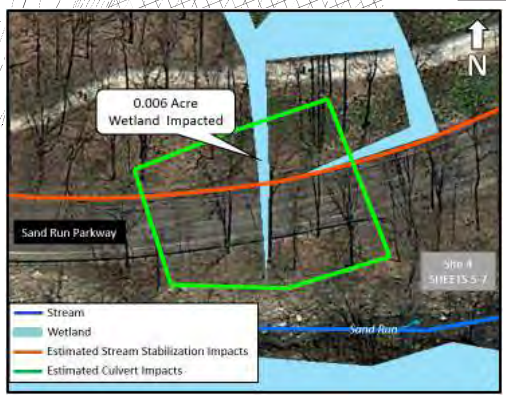




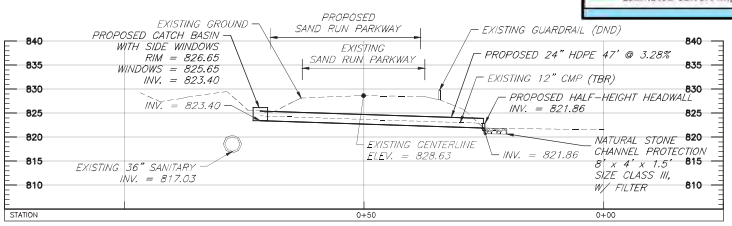
LOCATION MAP

HYDRAULIC DESIGN DATA	
DRAINAGE AREA: 8.3 Ac.	
Q(25): 22 CFS	Q(100): 33 CFS
HW(25): 827.2	HW(100): 828.7
TW(25): 817.3	TW(100): 818.7
V(25): 12 FPS	V(100): 13 FPS



NOTE: THIS WORK OVERLAPS WITH STREAM STABILIZATION SITE #4.

NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.



PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #29

EMHT

Date: April, 2015
Scale: As Noted

Sheet: 22 of 28

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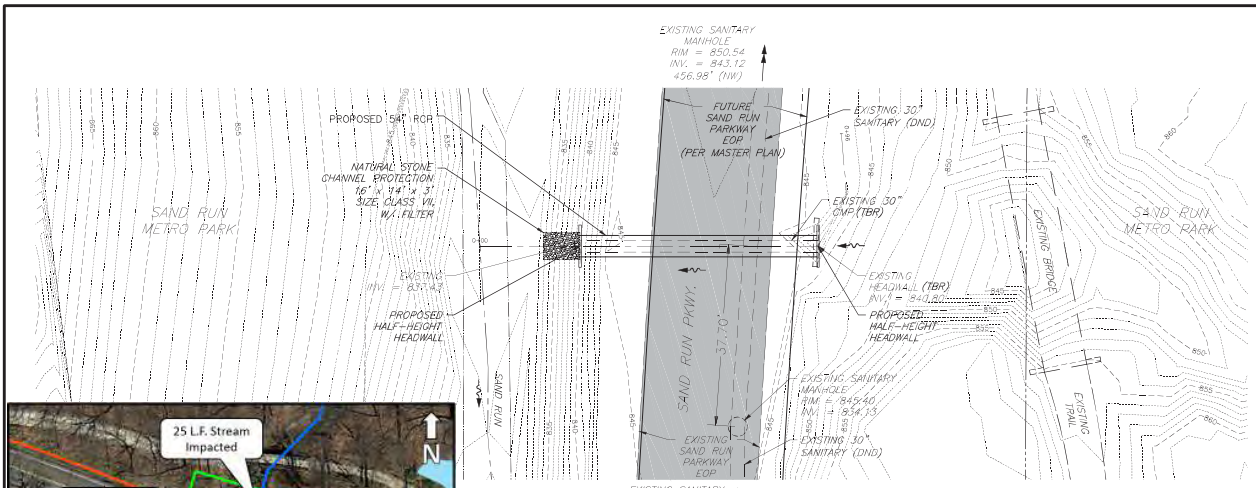

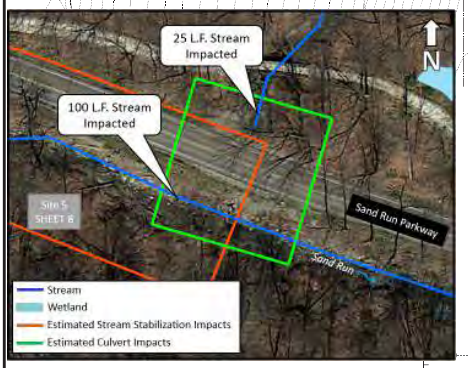

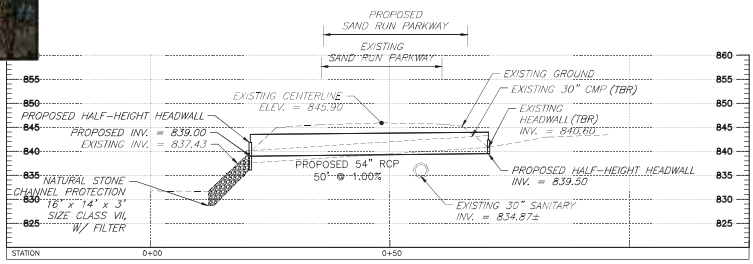

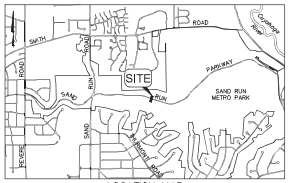

LOCATION MAP

HYDRAULIC DESIGN DATA	
DRAINAGE AREA: 41.0Ac.	
Q(25): 120 CFS	Q(100): 165 CFS
HW(25): 844.4	HW(100): 846.0
TW(25): 838.7	TW(100): 840.1
V(25): 12 FPS	V(100): 13 FPS

NOTE: THIS WORK OVERLAPS WITH STREAM STABILIZATION SITE #5.

NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.

PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

PLAN SET DATE
April, 2015

GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #30

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 23 of 28

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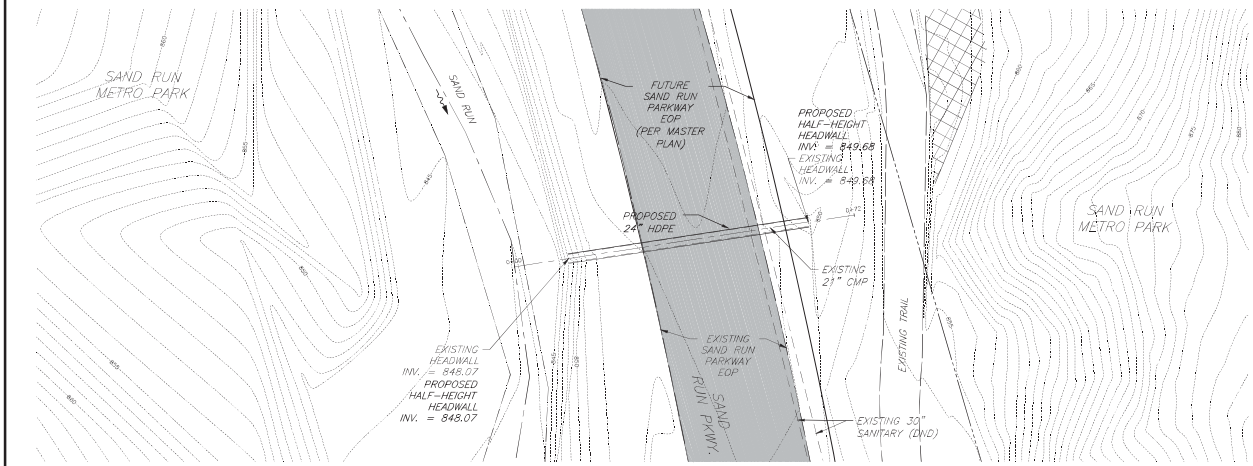
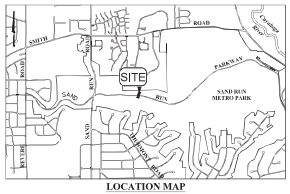
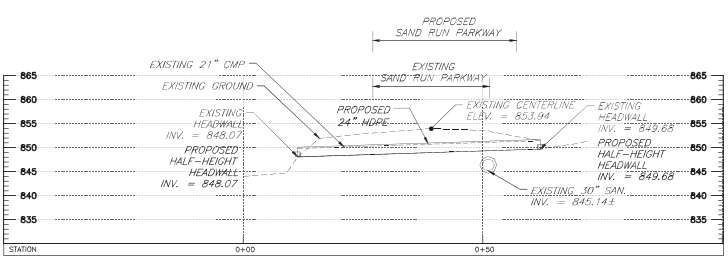
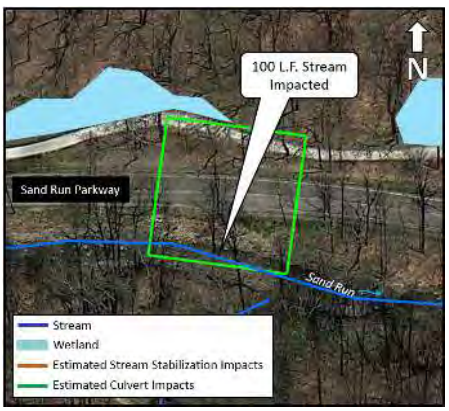




LOCATION MAP

HYDRAULIC DATA	
DRAINAGE AREA: 5.9 Ac.	
Q(25): 15 CFS	Q(100): 23 CFS
HW(25): 851.9	HW(100): 853.1
TW(25): 849.4	TW(100): 850.7
V(25): 11 FPS	V(100): 12 FPS





PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

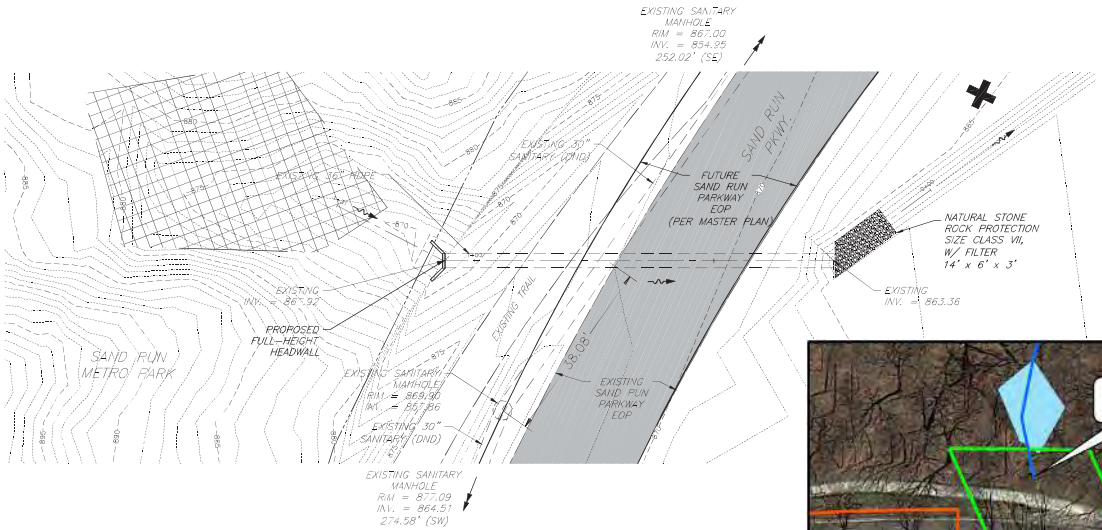
PLAN SET DATE
April, 2015

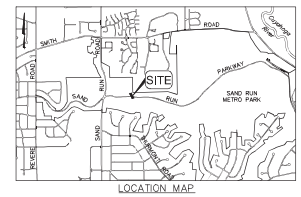
GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #32

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 24 of 28

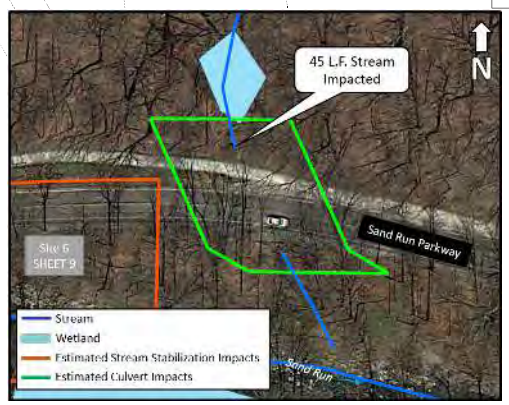
J:\20130911\Dwg\049sheets\Exhibits\Culvert Exhibits\Park Culvert 32.dwg Last Saved By: sorden, 4/12/2015 7:15 PM Last Printed By: Arden, Shawn, 4/12/2015 7:34 PM (No Xrefs)



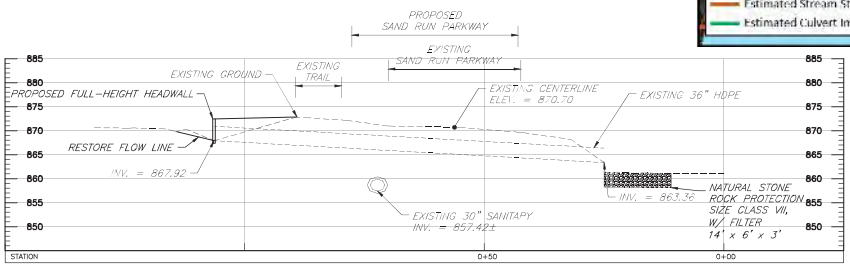


LOCATION MAP

HYDRAULIC DESIGN DATA	
DRAINAGE AREA: 14.8 Ac.	
Q(25): 57 CFS	Q(100): 79 CFS
HW(25): 872.4	HW(100): 873.3
TW(25): 862.2	TW(100): 864.1
V(25): 18 FPS	V(100): 19 FPS



NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.



PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015

GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #34

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 25 of 28

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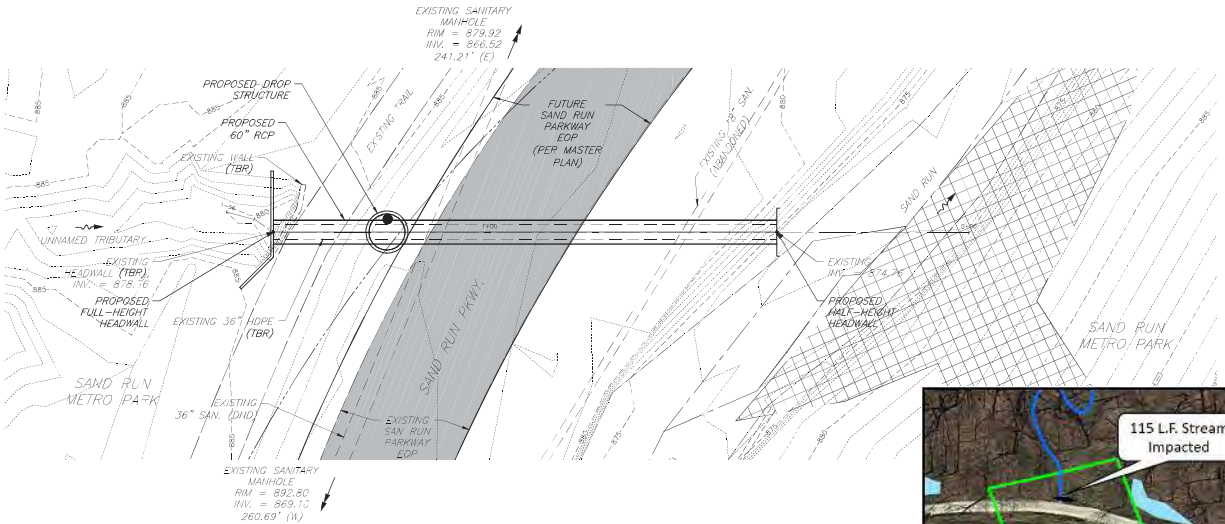
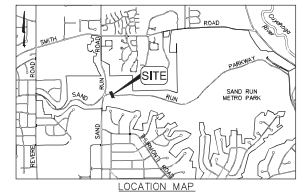
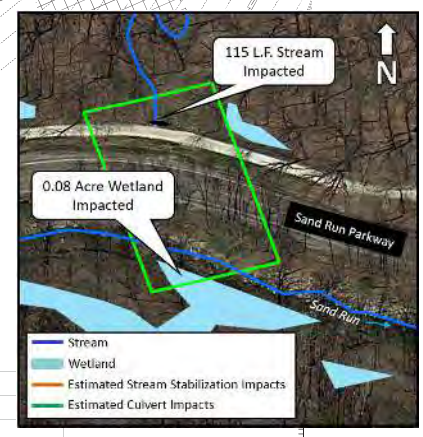


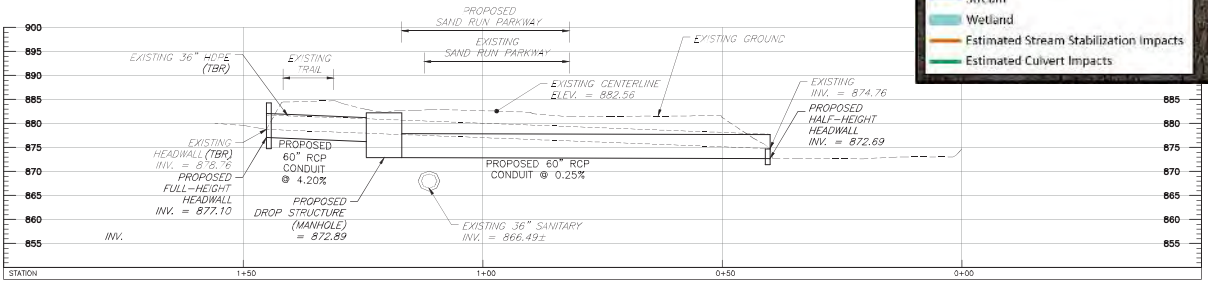


LOCATION MAP

HYDRAULIC DESIGN DATA	
DRAINAGE AREA: 66.4 Ac.	
Q(25): 188 CFS	Q(100): 260 CFS
HW(25): 881.3	HW(100): 885.2
TW(25): 879.3	TW(100): 881.2
V(25): 10 FPS	V(100): 13 FPS



NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.



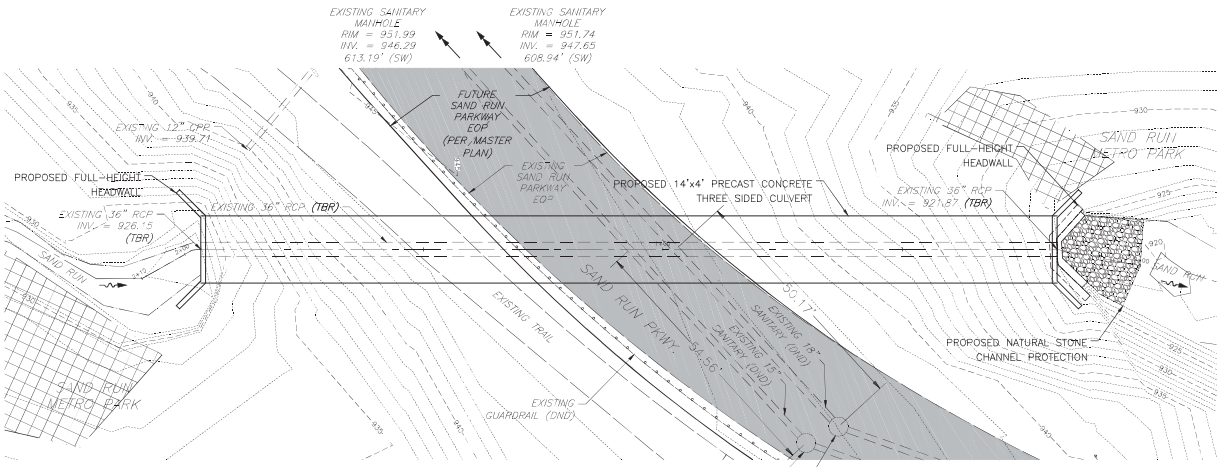
PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION
PLAN SET DATE
April, 2015

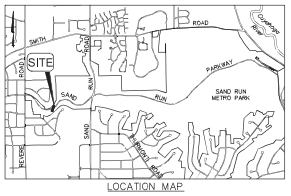
GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN IMPROVEMENT AND RESTORATION PLAN
SCHEMATIC PLAN
CULVERT #37

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 26 of 28

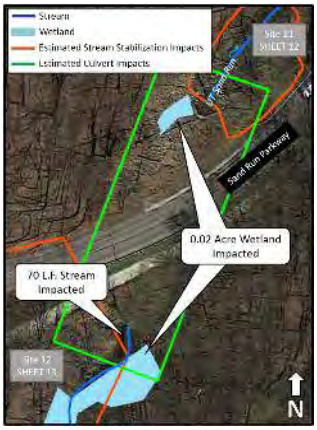
Z:\20130911\Dwg\04Sheets\Exhibits\Culvert Exhibits\Fork Culvert 37.dwg Last Saved By: sorden, 4/12/2015 4:47 PM Last Printed By: Arden, Shawn, 4/12/2015 7:38 PM (No Xrefs)





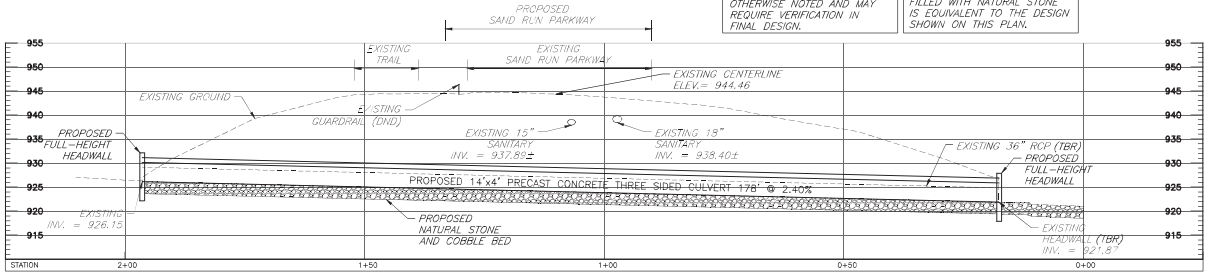
LOCATION MAP

HYDRAULIC DATA	
DRAINAGE AREA: 316 Ac.	
Q(25): 474 CFS	Q(100): 684 CFS
HW(25): 931.6	HW(100): 934.4
TW(25): 923.6	TW(100): 924.0
V(25): 11 FPS	V(100): 13 FPS



NOTE: DEPTH OF EXISTING UTILITIES SHOWN IN PROFILE VIEW IS ASSUMED UNLESS OTHERWISE NOTED AND MAY REQUIRE VERIFICATION IN FINAL DESIGN.

NOTE: 14'X7' PRECAST BOX CULVERT WITH BOTTOM 3FT FILLED WITH NATURAL STONE IS EQUIVALENT TO THE DESIGN SHOWN ON THIS PLAN.



PRELIMINARY
NOT TO BE USED FOR CONSTRUCTION

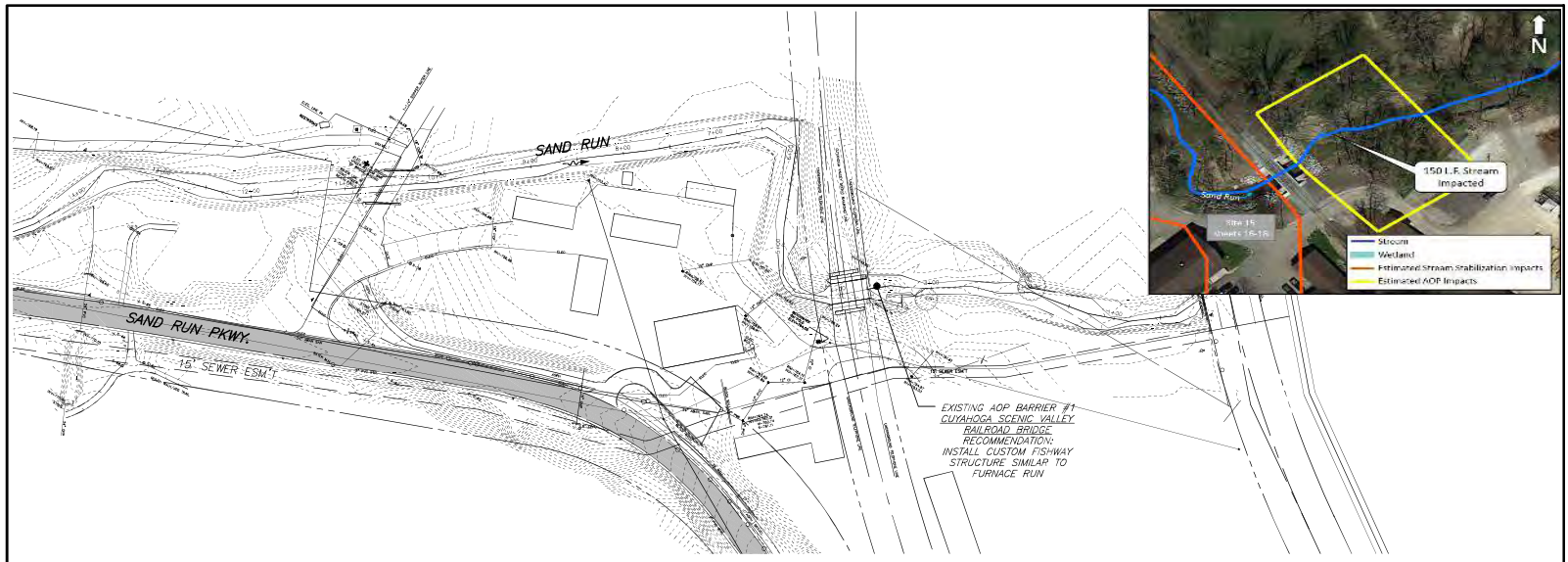
PLAN SET DATE
April, 2015

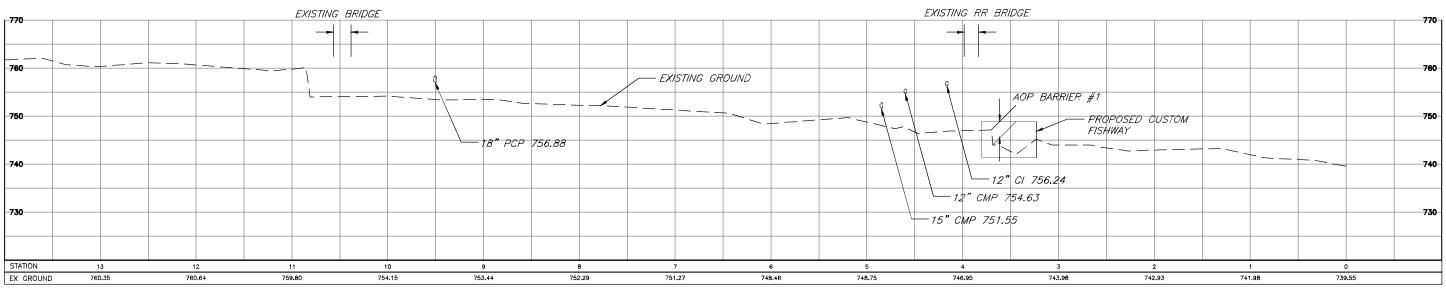
GRAPHIC SCALE
0 5 10 20

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN PARKWAY IMPROVEMENTS
SCHEMATIC PLAN
CULVERT #44

EMHT
Date: April, 2015
Scale: As Noted
Sheet: 27 of 28

J:\20130911\Dwg\04Sheets\Exhibits\Culvert Exhibits\Fork Culvert 44.dwg Last Saved By: sorden, 4/12/2015 5:27 PM Last Printed By: Arden, Shawn, 4/12/2015 5:40 PM (No Xrefs)





GRAPHIC SCALE
0 25 50 100

SUMMIT METRO PARKS
PRELIMINARY ENGINEERING REPORT
FOR
SAND RUN PARKWAY IMPROVEMENTS
SCHEMATIC PLAN – AQUATIC ORGANISM PASSAGE
EXHIBIT

EMHT
Date: June, 2020
Scale: As Noted
Sheet: 28 of 28

J:\20200388\Dwg\04Sheets\Exhibits\Schematic Plan AOP 1.dwg Last Saved By: sjensen, 6/19/2020 12:24 PM Last Printed By: Jensen, Alexandria, 6/19/2020 12:26 PM (No Xrefs)

Appendix C

Agency Correspondence

Ohio Department of Natural Resources

MIKE DEWINE, GOVERNOR — MARY MERTZ, DIRECTOR

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

April 1, 2019

Dan Clevidence
Ohio Emergency Management Agency
2855 W Dublin Granville Rd.
Columbus, OH 43235

Re: 19-187; HMGP Summit Metro Parks - Sand Run Parkway Protection Project

Project: The proposed project involves a culvert replacement as well as the restoration and stabilization of the stream channel adjacent to Sand Run Parkway to mitigate future roadway damage.

Location: The proposed project is located in the City of Akron, Summit County, Ohio.

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.

Natural Heritage Database: The Natural Heritage Database has the following records at or within a one-mile radius of the project area:

Spotted coral-root (*Corallorhiza maculata*), P
Sharp-shinned hawk (*Accipiter striatus*), SC
Cuyahoga Valley National Park – National Park Service
Cascade Valley Metro Park – Summit Co. Parks
Hampton Hills Metro Park – Summit Co. Parks
Sand Run Metro Park – Summit Co. Parks

The review was performed on the project area you specified in your request as well as an additional one-mile radius. Records searched date from 1980. This information is provided to inform you of features present within your project area and vicinity.

Please note that Ohio has not been completely surveyed and we rely on receiving information from many sources. Therefore, a lack of records for any particular area is not a statement that

rare species or unique features are absent from that area. Although all types of plant communities have been surveyed, we only maintain records on the highest quality areas.

Statuses are defined as: E = state endangered; T = state threatened; P = state potentially threatened; SC = state species of concern; SI = state special interest; A = species recently added to state inventory, status not yet determined; X = presumed extirpated in Ohio; FE = federal endangered, FT = federal threatened, FSC = federal species of concern, FC = federal candidate species.

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

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: 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 roost trees consists of 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. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within 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 30 and August 15, prior to any 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, this project is not likely to impact this species.

The project is within the range of the Iowa darter *(Etheostoma exile),* a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, and the lake chubsucker (*Erimyzon sucetta*), a state threatened fish. The DOW recommends no in-water work in perennial streams from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the habitat at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant, but also found in marshy meadows and roadside ditches. Due to the location, the type of habitat at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. If this type of habitat will be impacted, construction should be avoided in this habitat during the species' nesting period of May 1 to July 31. If this type of habitat will not be impacted, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Natural Areas: The Division of Natural Areas and Preserves has the following comment.

One state potentially threatened plant species spotted coral-root (*Corallorhiza maculata*,) has been documented in the Ohio Natural Heritage Database near the footprint of the proposed project. Due to the possible disruption of this species, it is recommended that a pre-construction survey of the proposed project site be conducted to ensure that the plant is not impacted. If there are any questions about the spotted coral-root or if survey assistance is required, please contact the Division of Natural Areas and Preserves' Chief Botanist, Rick Gardner. Mr. Gardner can be contacted directly at rick.gardner@dnr.state.oh.us or (614) 265-6419.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

John Kessler
Environmental Services Administrator

OHIO DEPARTMENT OF PUBLIC SAFETY
SAFETY · SERVICE · PROTECTION

- Bureau of Motor Vehicles
- Emergency Management Agency
- Emergency Medical Services
- Office of Criminal Justice Services
- Ohio Homeland Security
- Ohio State Highway Patrol

Mike DeWine, Governor
Thomas J. Stickrath, Director
Sima S. Merick
Executive Director

Emergency Management Agency
2855 West Dublin-Granville Road
Columbus, Ohio 43235-2206
(614) 889-7150
www.ema.ohio.gov

February 13, 2019

Ms. Sarah Tebbe (or John Kessler)
Office of Real Estate
Ohio Department of Natural Resources
2045 Morse Road, E-3
Columbus, Ohio 43229-6693

HMGP Summit Metro Parks – Sand Run Parkway Protection Project

Dear Ms. Tebbe:

The Ohio Emergency Management Agency is requesting information on federally listed threatened and/or endangered species, wetlands, wildlife areas or scenic rivers that may lie near the properties listed below. The properties is located in the City of Akron, in Summit County, Ohio and is included in a mitigation project which has been selected for a culvert replacement and to restore and stabilize several sections of stream channel adjacent to Sand Run Parkway to mitigate future roadway damage. through the Federal Emergency Management Agency's (FEMA) Hazard Mitigation Assistance (HMA) Grant Program.

ID	Property Owner	Address	Land Use	Parcel Number
1	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.133730 / Long: -81.577700	Park Land	6709023
2	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.136590 / Long: -81.564530	Park Land	7000555
3	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.132980 / Long: -81.591580	Park Land	1000104
4	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.133120 / Long: -81.595850	Park Land	0903813

Enclosed are the ODNR Data Request Form, topographic map, and street map detailing the project area. The project area is in Summit County and is located on the Peninsula Quadrangle. If possible, Ohio EMA

would appreciate your response within the next 30 days. If you require additional information, please contact me at dtclevidence@dps.ohio.gov or (614) 799-3533. Thank you for your assistance.

Sincerely,

Dan Clevidence
Mitigation Specialist

Enclosures: ODNR Data Request Form
Topographic Map
Street Map

Ohio Department of Natural Resources
MIKE DEWINE, GOVERNOR MARY MERTZ, DIRECTOR

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

September 3, 2019

Patrick Hoyng
EMH&T
5500 New Albany Road
Columbus, Ohio43054

Re: 19-653; Sand Run Tributary Improvement Projects

Project: The proposed project involves stream maintenance and improvement activities at eight sites along Sand Run and an unnamed tributary to Sand Run.

Location: The proposed project is located in the Cities of Akron and Fairlawn, Summit County, Ohio.

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.

Natural Heritage Database: The Natural Heritage Database records were included in the project documentation and are still accurate.

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

The DOW recommends that impacts to streams, wetlands and other water resources be avoided and minimized to the fullest extent possible, and that best management practices be utilized to minimize erosion and sedimentation.

The project is within the range of the Indiana bat (*Myotis sodalis*), a state endangered and federally endangered species. The following species of trees have relatively high value as potential Indiana bat roost trees to include: 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

cavities in upland areas or riparian corridors and living trees with exfoliating bark, cavities, or hollow areas formed from broken branches or tops. However, Indiana bats are also dependent on the forest structure surrounding roost trees. If suitable habitat occurs within the project area, the DOW recommends trees be conserved. If suitable habitat occurs within 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 30 and August 15, prior to any 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, this project is not likely to impact this species.

The project is within the range of the Iowa darter *(Etheostoma exile)*, a state endangered fish, the pugnose minnow (*Opsopoeodus emiliae*), a state endangered fish, the western banded killifish (*Fundulus diaphanus menona*), a state endangered fish, and the lake chubsucker (*Erimyzon sucetta*), a state threatened fish. The DOW recommends no in-water work in perennial streams from April 15 to June 30 to reduce impacts to indigenous aquatic species and their habitat.

The project is within the range of the spotted turtle (*Clemmys guttata*), a state threatened species. This species prefers fens, bogs and marshes, but also is known to inhabit wet prairies, meadows, pond edges, wet woods, and the shallow sluggish waters of small streams and ditches. Due to the location, the habitat at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the smooth greensnake (*Opheodrys vernalis*), a state endangered species. This species is primarily a prairie inhabitant, but also found in marshy meadows and roadside ditches. Due to the location, the type of habitat at the project site and within the vicinity of the project area, and the type of work proposed, this project is not likely to impact this species.

The project is within the range of the American bittern (*Botaurus lentiginosus*), a state endangered bird. Nesting bitterns prefer large undisturbed wetlands that have scattered small pools amongst dense vegetation. They occasionally occupy bogs, large wet meadows, and dense shrubby swamps. Due to the location, the habitat at the project site, and the type of work proposed, this project is not likely to impact this species.

Due to the potential of impacts to federally listed species, as well as to state listed species, we recommend that this project be coordinated with the U.S. Fish & Wildlife Service.

Water Resources: The Division of Water Resources has the following comment.

The local floodplain administrator should be contacted concerning the possible need for any floodplain permits or approvals for this project. Your local floodplain administrator contact information can be found at the website below.

http://water.ohiodnr.gov/portals/soilwater/pdf/floodplain/Floodplain%20Manager%20Community%20Contact%20List_8_16.pdf

ODNR appreciates the opportunity to provide these comments. Please contact Sarah Tebbe, Environmental Specialist, at (614) 265-6397 or Sarah.Tebbe@dnr.state.oh.us if you have questions about these comments or need additional information.

John Kessler
Environmental Services Administrator

OHIO HISTORY CONNECTION

In reply refer to
2019-SUM-44139-2

June 22, 2020

Duane Castaldi
U.S. Department of Homeland Security
FEMA
536 S. Clark Street, 6th Floor
Chicago, Illinois 60605

Re: Summit Metro Parks, Sand Run Parkway Protection, 975 Treaty Line Road, Akron, Summit County, Ohio

This is in response to your additional correspondence, received on June 10, 2020, regarding this project. The undertaking is defined as eleven locations of erosion control along Sand Run parkway in Akron, Summit County, Ohio. Additional areas are added in this submission. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information submitted, it is my opinion that the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2000, or by email at nyoung@ohiohistory.org.

Sincerely,

Nathan J. Young

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

Diana Welling
Deputy State Historic Preservation Officer
Ohio Historic Preservation Office
800 East 17th Avenue
Columbus, Ohio 43211

Re: Summit Metro Parks, Sand Run Parkway Protection, Akron, Summit County
Addendum for Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139

Dear Ms. Welling:

Pursuant to the Section 106 of the National Historic Preservation Act, I am writing this letter to reopen and conclude consultation regarding the captioned Hazard Mitigation Grant Program project.

On March 14, 2020, your office notified the Ohio Emergency Management Agency that the proposed undertaking would not affect properties listed in or eligible for listing in the National Register of Historic Places. Since then, the recipient has added scope to the project, necessitating the expansion of the area of potential effects. In accordance with 36 CFR §800.11, I am enclosing documentation regarding the added scope of this undertaking and its effect on historic properties. The documentation provides the justification for FEMA's finding of no adverse effects on historic properties; the purpose of this communication is to seek concurrence in that finding.

Due to workplace restrictions in response to COVID-19, we are using email to deliver this Section 106 consultation. We understand the impacts COVID-19 has had on your operations and will provide a paper copy of this consultation through US Mail when our office reopens, including notice that the documentation follows an electronic submission, per your instructions.

Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email. For your convenience, we have included a response area below. Pursuant to 36 CFR 800.5(c)(1), if we receive no response from your office within thirty (30) days, we will consider the lack of response agreement with FEMA's finding and will move forward with this undertaking. If you have questions, do not hesitate to contact me at duane.castaldi@fema.dhs.gov or 312-408-5549

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may email this page to duane.castaldi@fema.dhs.gov* ++++++++

Re: Summit Metro Parks, Sand Run Parkway Protection, Akron, Summit County
Addendum for Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139

☐ Under the authority of the National Historic Preservation Act of 1966, as amended, the Ohio State Historic Preservation Office ***concurs*** with FEMA's finding that the captioned undertaking will result in ***no adverse effect on historic properties***.

☐ Under the authority of the National Historic Preservation Act of 1966, as amended, the Ohio State Historic Preservation Office ***objects*** to FEMA's finding that the captioned undertaking will result in ***no adverse effect on historic properties*** for the reasons provided below:

Ohio State Historic Preservation Office

Date

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

—Addendum—
Summit Metro Parks, Sand Run Parkway Protection
Akron, Summit County
Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139
41.133748, -81.572017

Description of Undertaking and APE:

In response to documentation meeting the requirements of 36 CFR §800.11, SHPO notified the Ohio Emergency Management Agency (EMA) that the captioned undertaking would not affect properties listed in or eligible for listing in the National Register of Historic Places. Since then, Ohio EMA informed FEMA that the project would include work on additional resources. Specifically, the project now includes the following:

- Thirteen streambank stabilization sites;
- Nine culver repairs, replacements, or upgrades with associated site work; and
- Development of an aquatic organism passage (AOP) improvement just east of the Valley Railway bridge located just east of the park Service Center and Volunteer Offices

Among work now in scope are a streambank stabilization segment immediately west of the Cuyahoga Scenic Valley Railroad bridge, north of the park's Service Center and the AOP improvement. The latter of these will address an abrupt stream grade elevation change located immediately downstream of the Service Center. An existing five-foot channel drop from the edge of the railroad bridge down to the bottom of a scour pool will be replaced by a custom fish passage that will function similar to a fish ladder, with large stones carefully placed to create a gradually stepped incline, to facilitate movement of aquatic organisms. Work will be done in the existing stream channel, up to the existing railway bridge, with staging from the nearby paved drive and parking lot. No work will be done on the historic bridge itself.

The AOP improvement and nearby stream stabilization require the expansion of the APE to include a portion of the Valley Railway Historic District. The revised APE, like the original, includes Sand Run Parkway, its right-of-way, sections of the nearby Mingo Trail, and portions of the adjacent Sand Run stream and unnamed tributaries as required to complete the work. The previously identified APE and the expanded APE are noted on the attached aerials.

Steps Taken to Identify Historic Properties:

Archaeology

The expanded APE includes an additional section of an area surveyed in 2008, parts of which were also within the previously submitted APE. No further archaeological research was recommended "unless future development has the potential for impacts" to sites located on a ridge to the north of and outside the APE for this undertaking.[1] The survey authors then suggest that conducting further investigation "of the graded, grassy area in front of the Mingo Pavilion on the ridge top" near 33-SU-482 could answer the question of the location of the historic Cuyahoga Old Town and may further reveal more about the prehistoric component of the site. Aerials included in this submission show that this area is outside the revised APE for this undertaking. See the previous submission for analysis of areas impacted by the streambank stabilization and culvert activities within the previously reported APE and SHPO's assessment that no historic properties would be affected by that work.

Structures

The expanded APE now includes a small section of the Valley Railway Historic District, which is located along the Cuyahoga Valley between Rockside Road at Cuyahoga National Recreation Area and Howard Street at Little Cuyahoga Valley in Akron, Summit County, Ohio (NPS # 85001123). The significance of the Valley Railway is noted in its National Register Nomination as follows:

> *The line is unique because is follows the proven route of an earlier transportation system, the canal, and it retains the character of a nineteenth century railway line to an unusual degree. Unlike other railroads, the line was never double-tracked for expanded traffic, and the right-of-way remained virtually unaltered. While the rights-of-way of the other railroads mentioned above remain in existence and many of them in operation as parts of the Amtrak and Conrail systems, the Valley Railway possesses a unique integrity of location, setting, feeling and association.*

These characteristics of the section of the district within the APE for this undertaking appear not to have changed since the listing of the district in 1985.

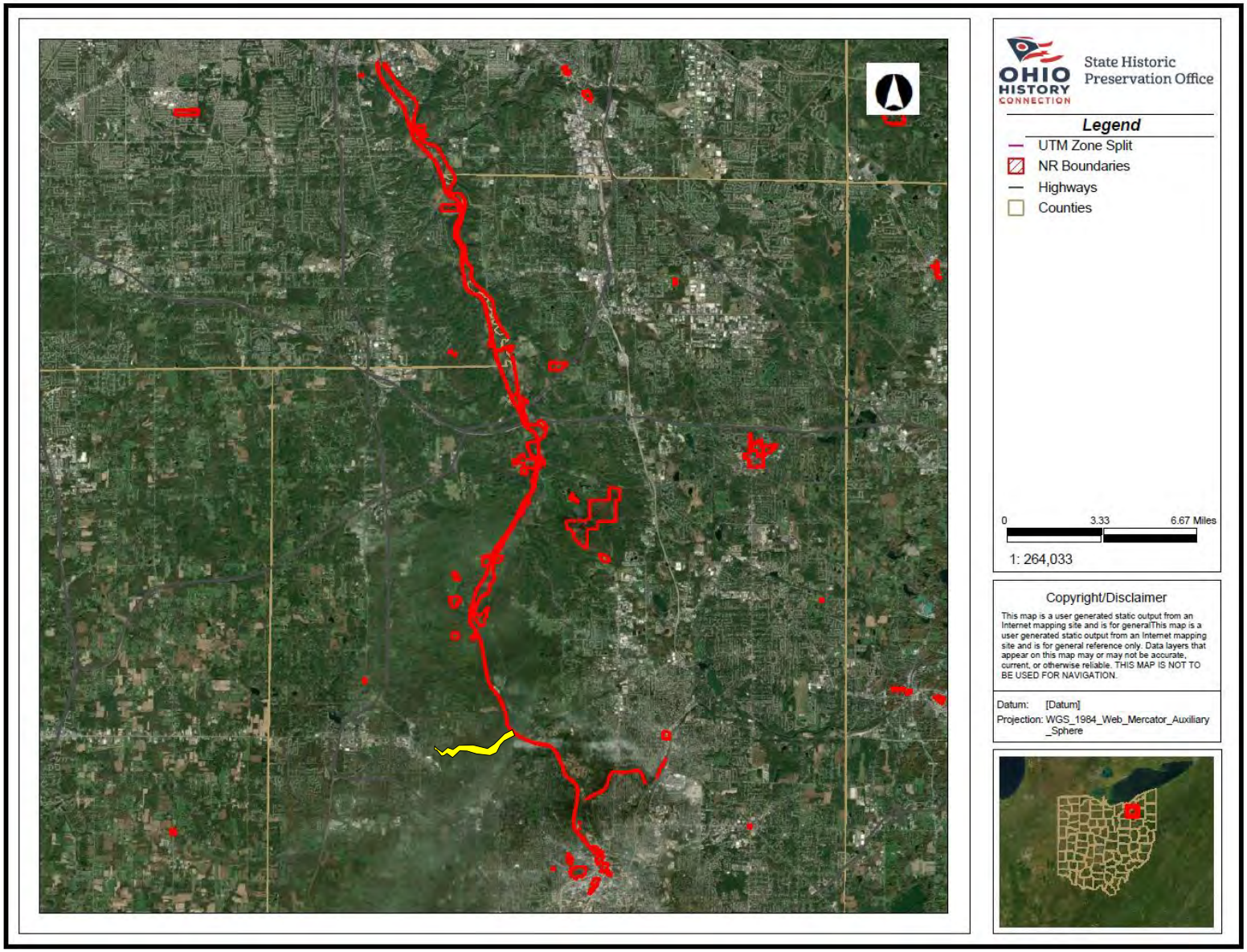
Determination of Eligibility:

FEMA reaffirms that the Valley Railroad Historic District continues to be ***eligible for listing on the National Register of Historic Places*** under Criterion A for Transportation.

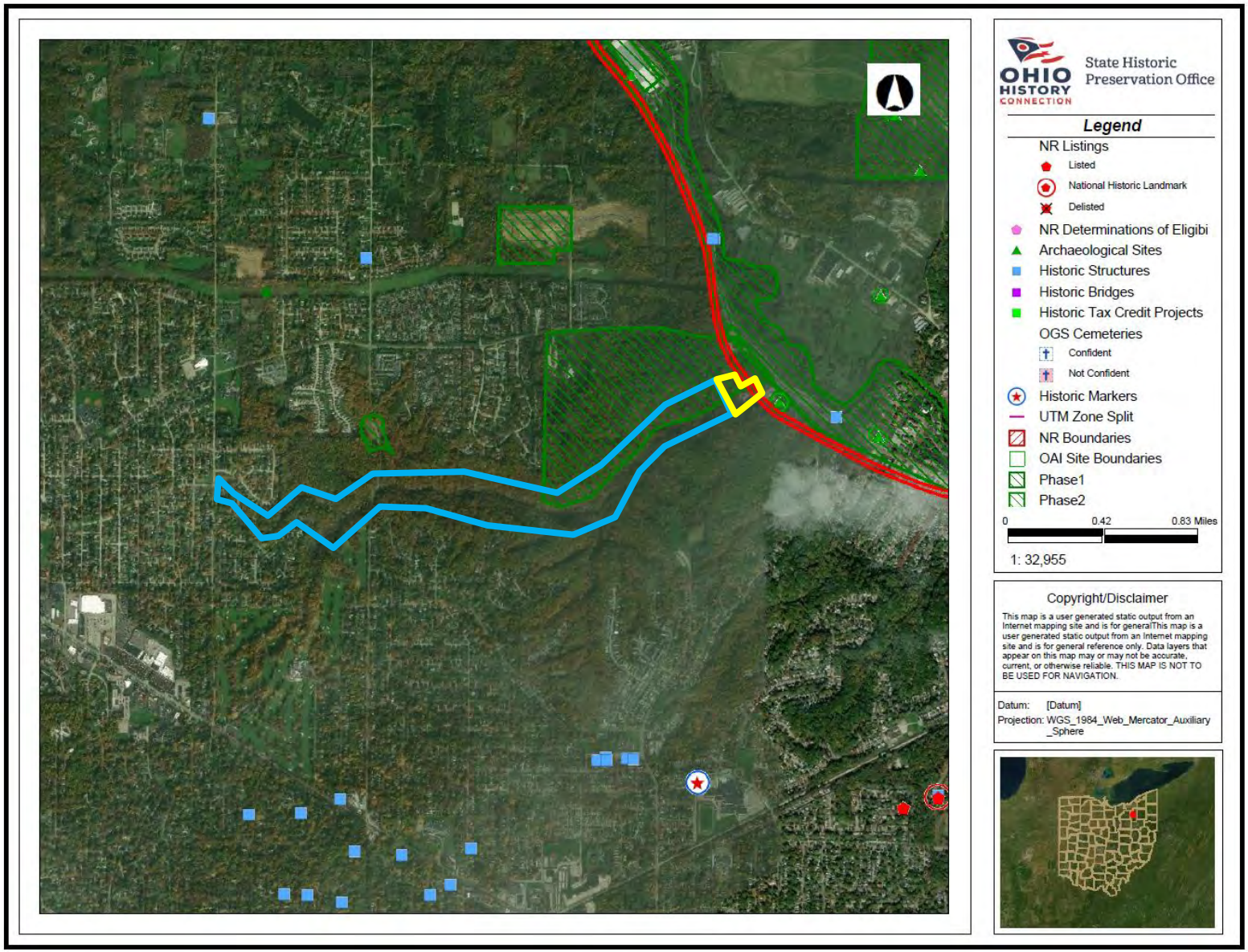
[1] Linda Whitman *et al.*, *Report of the Historic and Archaeological Investigations at Nature Realm and a portion of Sand Run Metro Park, City of Akron, Summit County, Ohio* (November 2008), OHI #SU-17412, page ii.

Undertaking's Effects on Historic Properties:	Only a small segment of this 24.5-mile linear district will be affected by this undertaking, namely the area directly adjacent to the work to be done within the stream. No physical work will be done on the railway itself. Equipment will be staged from Sand Run Parkway east of the railway. Work will be done in the stream channel up to the existing railway bridge. No work will be done on the historic bridge itself. The project proposes replacing a five-foot drop from the edge of the bridge to a stilling pool with a gradual change in grade of the stream bed by installing boulders and other materials to allow for passage of aquatic animals. Because of the position of the stream channel, changes to the views of Sand Run are not likely to be visible from any public way, except from the railway bridge. However, the view of Sand Run from the bridge is not a character-defining feature of the historic district and will therefore not affect the characteristics related to the district's significance, which have been defined as the railway's route, track configuration, and historic right-of-way.
Finding:	FEMA finds that this undertaking, including the proposed the added scope items described here, will result in ***no adverse effects on historic properties***.

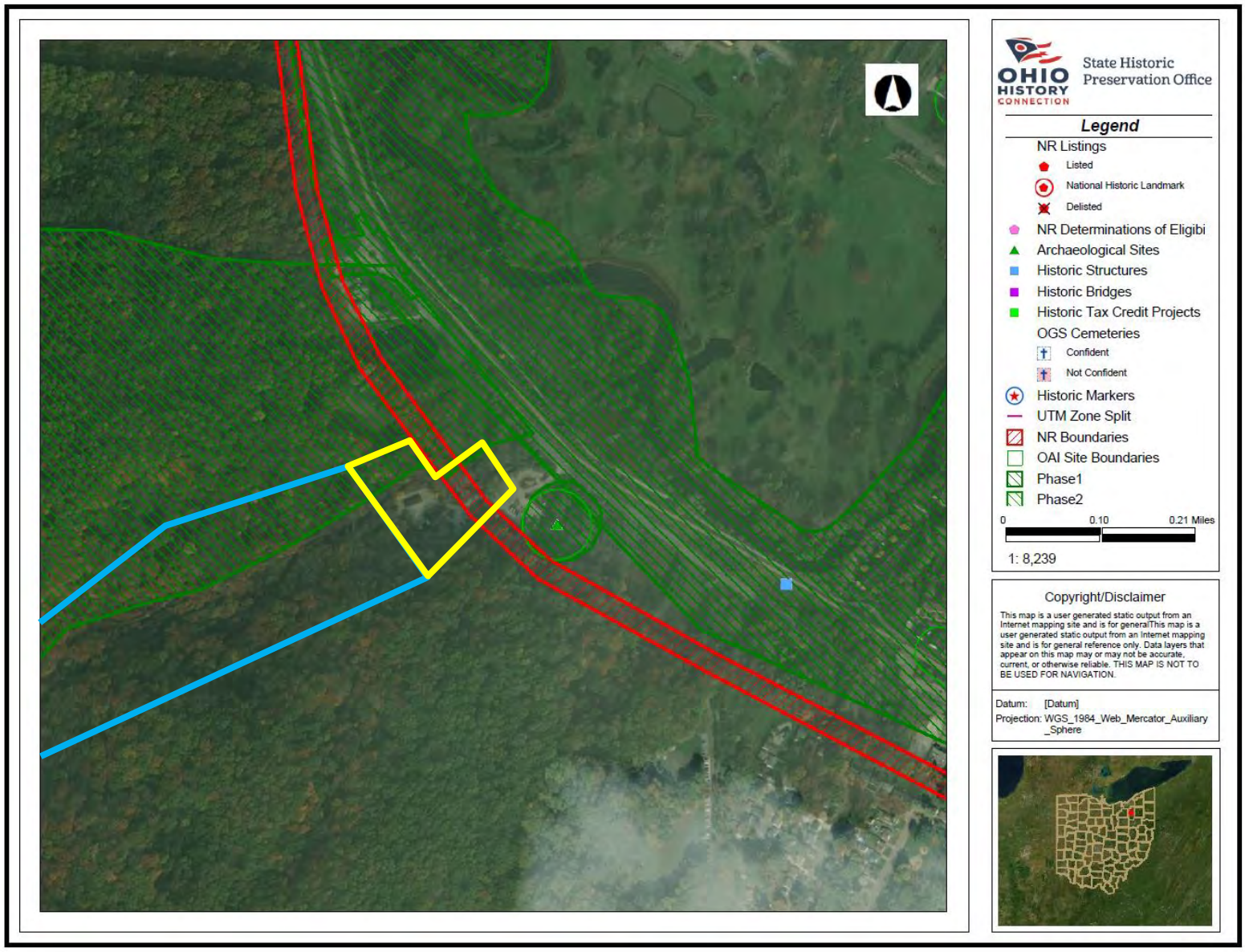
Boundary of the 24.5-mile Valley Railway Historic District noted in red with approximate APE in yellow (*Ohio Historic Inventory*)



Original approximate APE noted in blue; proposed APE extension noted in yellow (*Ohio Historic Inventory*)

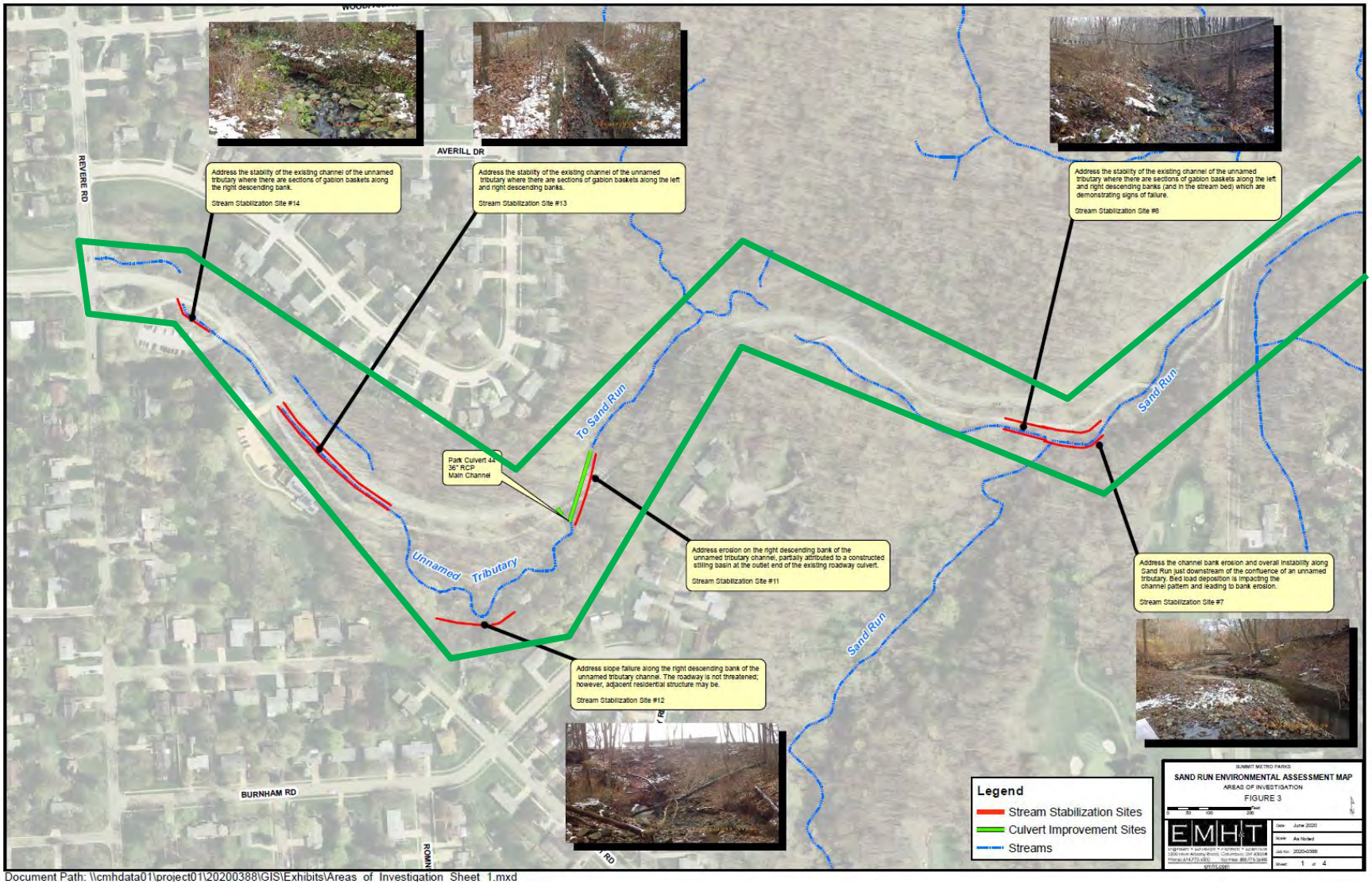


Original APE noted in blue; proposed APE extension noted in yellow (*Ohio Historic Inventory*)

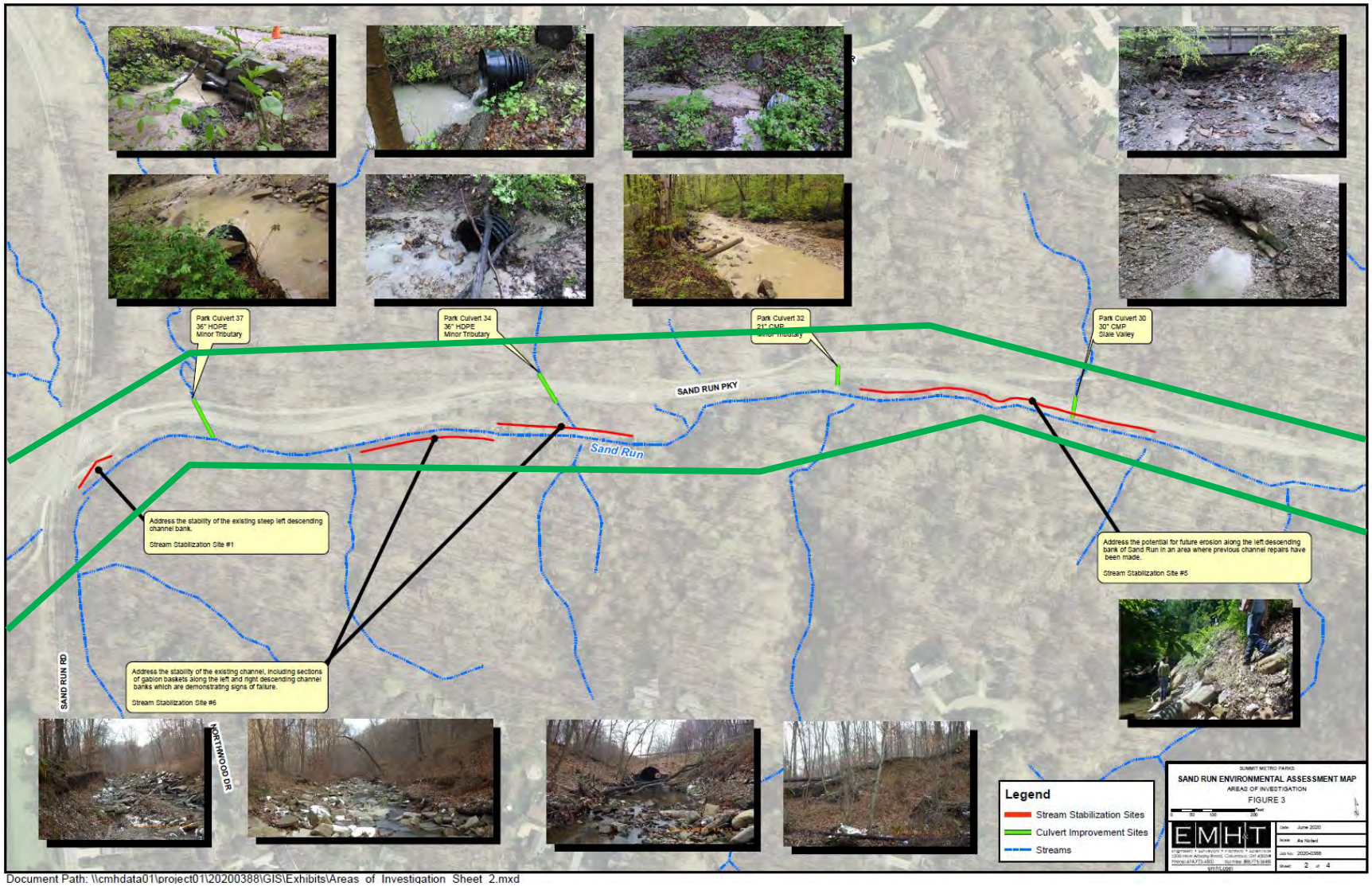


Revised APE noted in green; "grassy area in front of the Mingo Pavilion" noted in yellow (*GoogleEarth*)

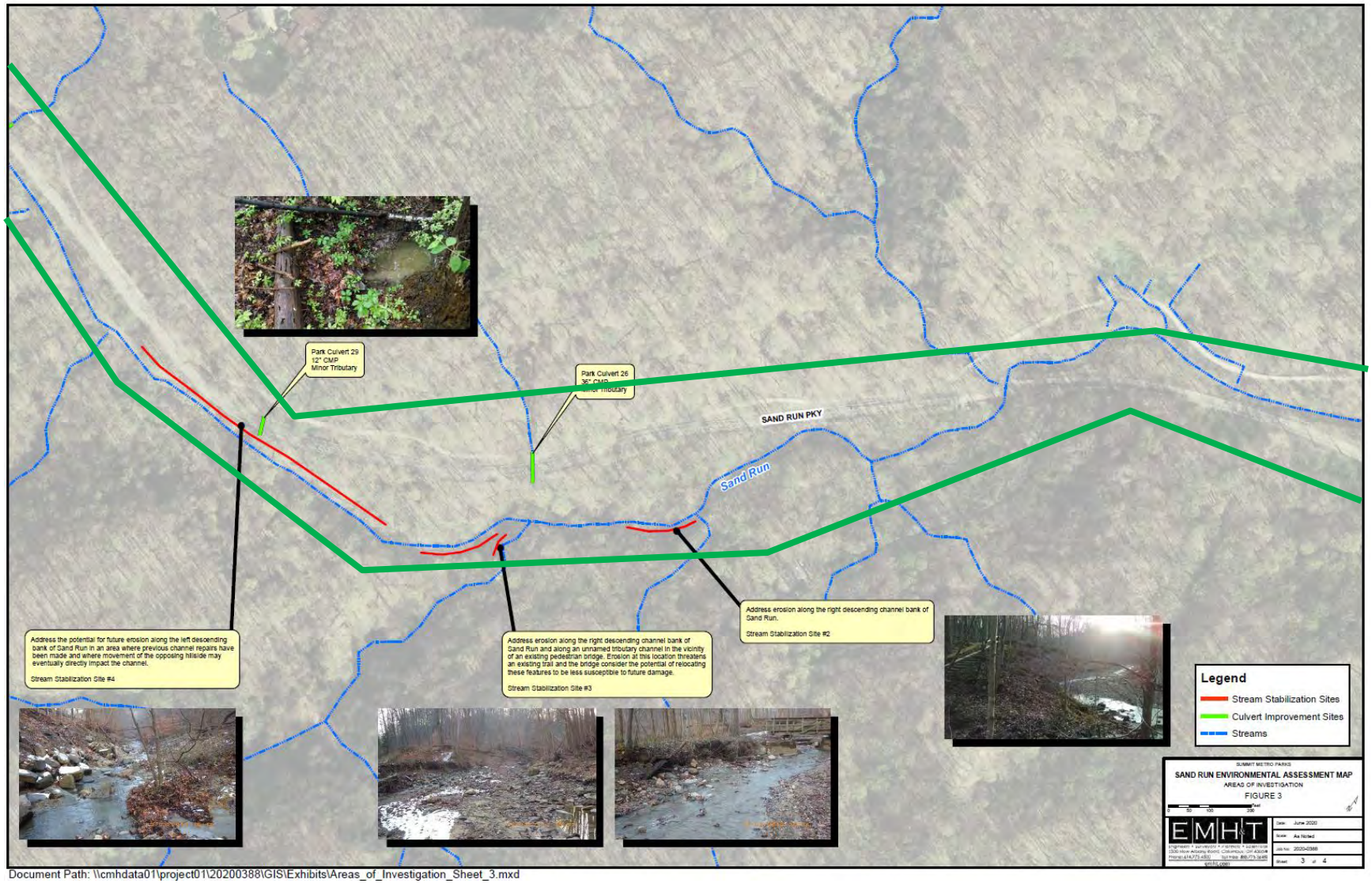
Proposed APE boundaries noted in green



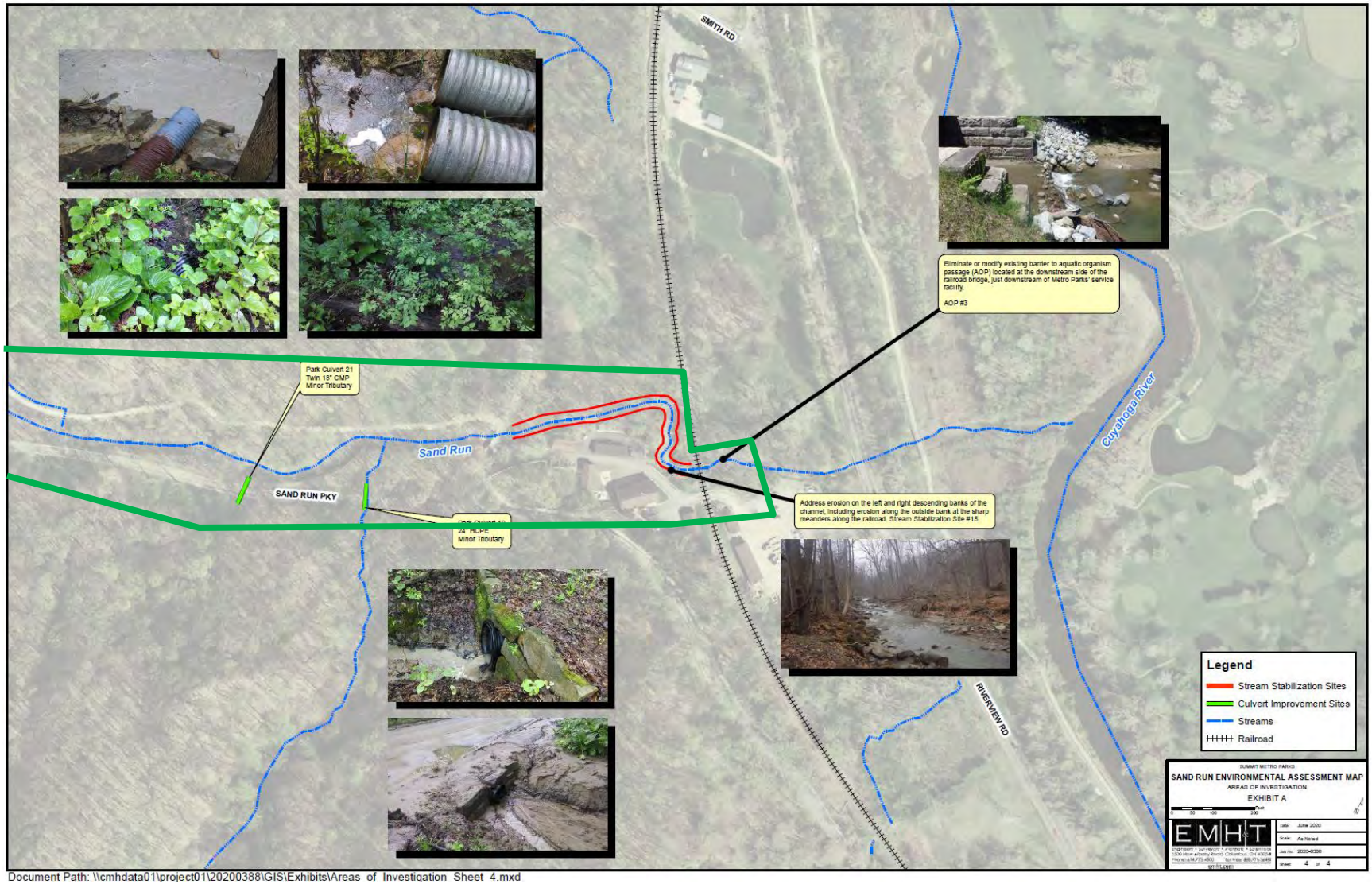
Proposed APE boundaries noted in green



Proposed APE boundaries noted in green



Proposed APE boundaries noted in green



OHIO HISTORY CONNECTION

In reply refer to
2019-SUM-44139

March 14, 2019

Dan Clevidence
Ohio EMA
2855 W. Dublin Road
Columbus, Ohio 43235

Dear Mr. Clevidence:

Re: Summit Metro Parks, Sand Run Parkway Protection, 975 Treaty Line Road, Akron, Summit County, Ohio

This is in response to your correspondence, received on February 25, 2019, regarding this project. The undertaking is defined as eleven locations of erosion control along Sand Run parkway in Akron, Summit County, Ohio. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information submitted, it is my opinion that the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2000, or by email at nyoung@ohiohistory.org.

Sincerely,

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

OHIO DEPARTMENT OF PUBLIC SAFETY
SAFETY · SERVICE · PROTECTION

- Bureau of Motor Vehicles
- Emergency Management Agency
- Emergency Medical Services
- Office of Criminal Justice Services
- Ohio Homeland Security
- Ohio State Highway Patrol

Mike DeWine, Governor
Thomas J. Stickrath, Director
Sima S. Merick
Executive Director

Emergency Management Agency
2855 West Dublin-Granville Road
Columbus, Ohio 43235-2206
(614) 889-7150
www.ema.ohio.gov

February 21, 2019

Ms. Diana Welling
Department Head
Ohio Historic Preservation Office
800 East 17th Avenue
Columbus, OH 43211-2474

HMGP

Dear Ms. Welling:

In accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, we have reviewed the listed project described below and are requesting your comments and concurrence.

The City of Dover has been selected by the Federal Emergency Management Agency's (FEMA) Hazard Mitigation Assistance (HMA) Grant Program for the replacement of a culvert and the stabilization of 11 section of streambank to protect the Sand Run Parkway.

Enclosed is a project summary form and documentation table, a packet of maps exemplifying the project area and photographs illustrating the associated structure and the project area. The Ohio Emergency Management Agency is of the opinion that there are no architecturally or historically significant structures and the construction of the project structure will not impact any historically significant structures.

If possible, Ohio EMA would appreciate your response within the next 30 days. If you require additional information, please contact me at (614) 799-3533. Thank you for your assistance.

Sincerely,

Dan Clevidence
Mitigation Specialist

Enclosures


REVERE ROAD
SAND RUN ROAD
SAND RUN PARKWAY
Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
Unnamed Tributary To Sand Run
Sand Run
LEGEND
Culvert Improvement
Stabilization Sites
FEMA Flood Zone
FEMA Floodway
FEMA 100-Year Floodplain
FEMA 500-Year Floodplain
SOURCE
Imagery: OSIP (April 2011)
Imagery: FEMA FIRM (April 2016)
SAND RUN PARKWAY MITIGATION PLAN
HMGP APPLICATION
FLOOD BOUNDARY OF PROJECT SITE
EMH&T
Date: November 03, 2016
Scale: 1" = 600'
Job No: 2016-1261
Sheet: 1 of 4
Document Path: J:\20181261\GIS\Grant Application\FEMA Project Site.mxd

OHIO HISTORY CONNECTION

State Historic Preservation Office

Legend

- NR Listings
  - Listed
  - National Historic Landmark
  - Delisted
- NR Determinations of Eligibi
- Archaeological Sites
- Historic Structures
- Historic Bridges
- Historic Tax Credit Projects
- OGS Cemeteries
  - Confident
  - Not Confident
- Dams
- UTM Zone Split
- NR Boundaries
- OAI Site Boundaries
- Phase1
- Phase2

0 0.32 0.64 Miles

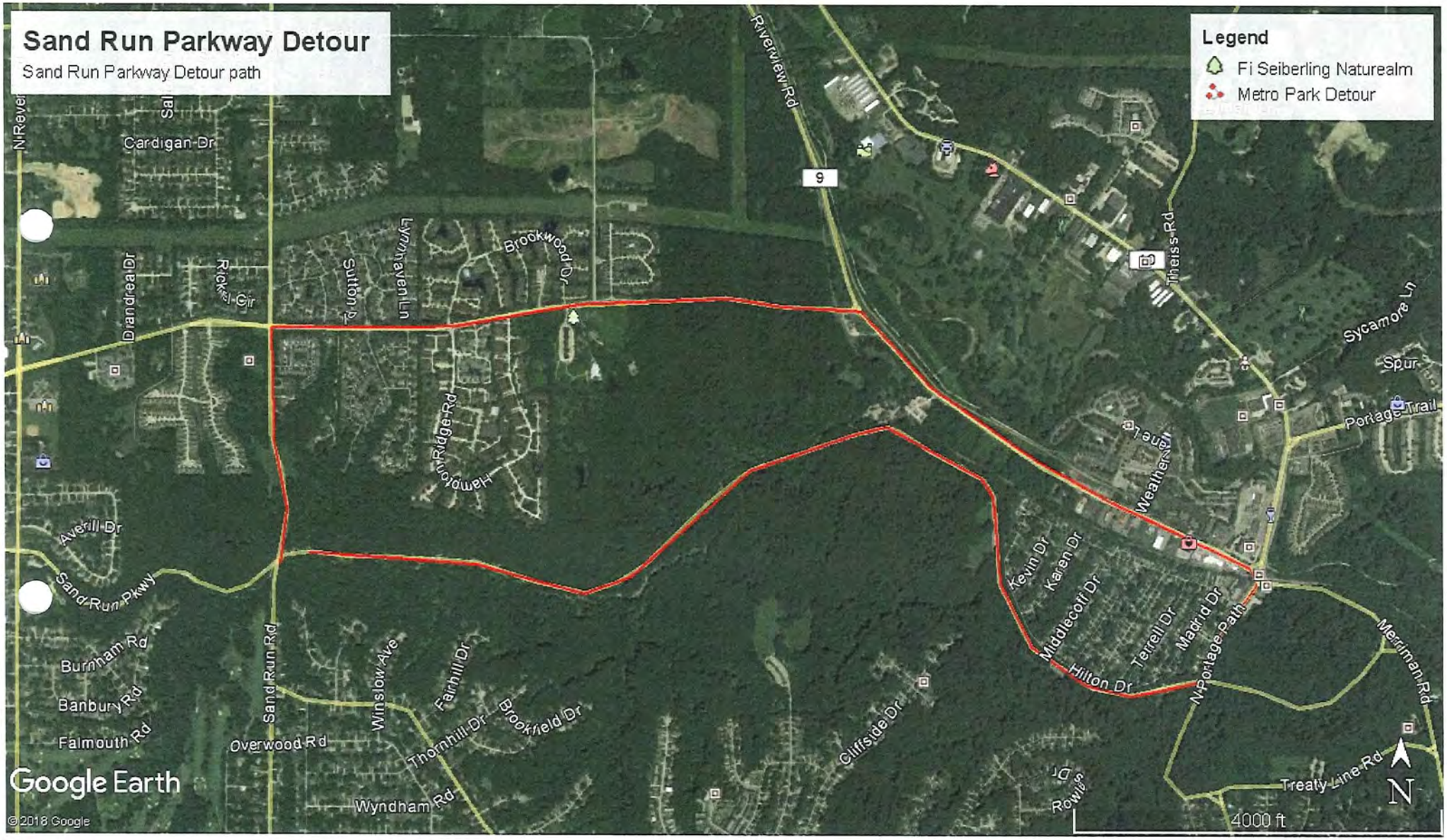
1: 25,328

Copyright/Disclaimer

Datum: [Datum]

Projection: WGS_1984_Web_Mercator_Auxiliary_Sphere

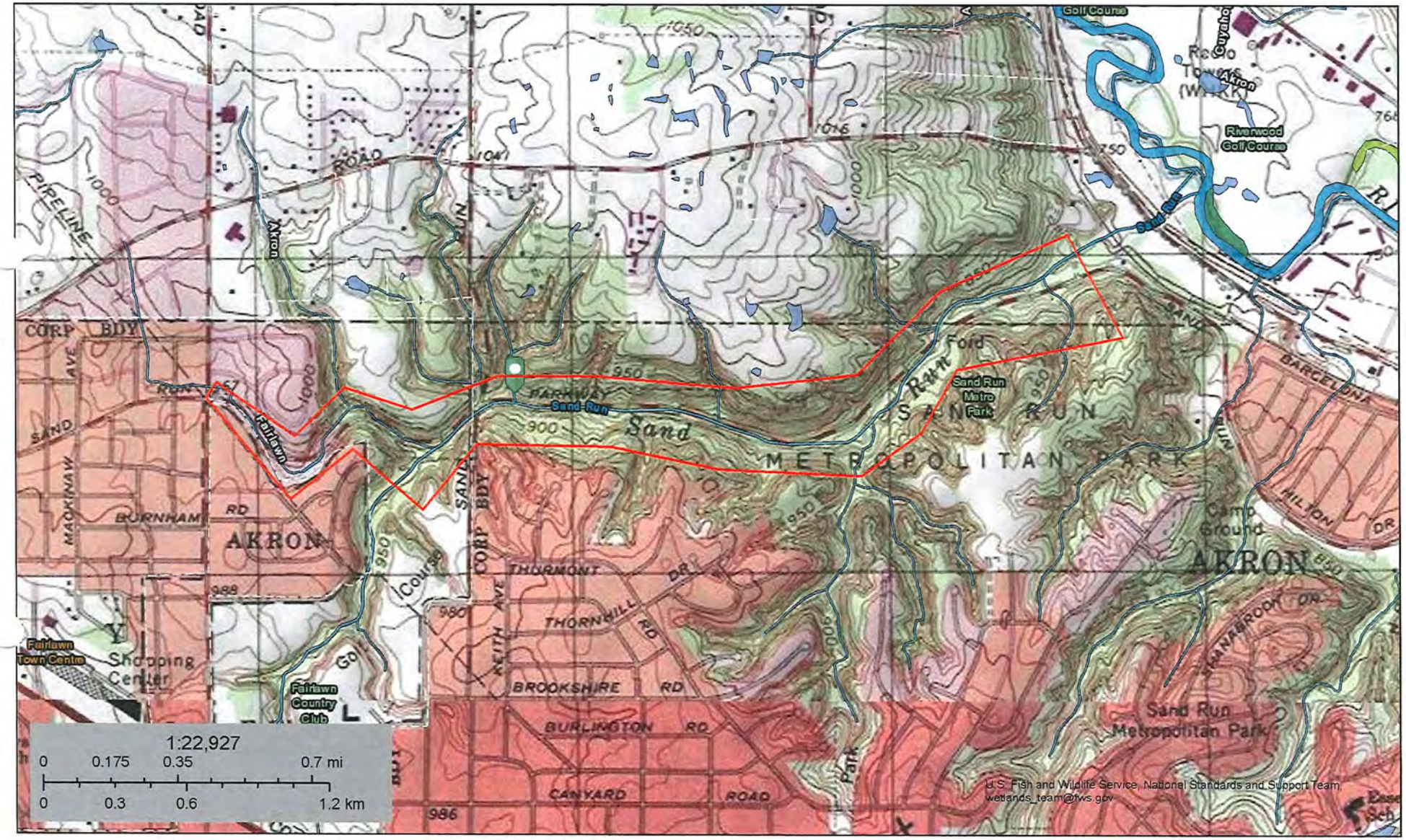

REVERE ROAD
SAND RUN ROAD
Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
SAND RUN PARKWAY
Unnamed Tributary To Sand Run
Sand Run
LEGEND
Culvert Improvement
Stabilization Sites
SOURCE
Imagery: OSIP (April 2011)
SAND RUN PARKWAY MITIGATION PLAN
HMGP APPLICATION
PROJECT SITE AND STRUCTURES
EMH&T
November 03, 2015
1" = 600'
2955-1261
1 of 4
Document Path: J:\20181261\GIS\Grant Application\Project Site.mxd


Sand Run Parkway Detour
Sand Run Parkway Detour path
Legend
Fi Seiberling Naturealm
Metro Park Detour
Riverview Rd
9
Theiss Rd
Sycamore Ln
Spur
Portage Trail
Cardigan Dr
Drandrea Dr
Rickel Cir
Sutton Ln
Lynnhaven Ln
Brookwood Dr
Hampton Ridge Rd
Averill Dr
Sand Run Pkwy
Burnham Rd
Banbury Rd
Falmouth Rd
Overwood Rd
Sand Run Rd
Winslow Ave
Fairhill Dr
Thornhill Dr
Brookfield Dr
Wyndham Rd
Cliffside Dr
Kevin Dr
Karen Dr
Middlecoff Dr
Terrell Dr
Madrid Dr
Hilton Dr
N Portage Path
Merriman Rd
Treaty Line Rd
Weatherby
Google Earth
©2018 Google
4000 ft
N

U.S. Fish and Wildlife Service

National Wetlands Inventory

Sand Run Metro Park_Topo Map



February 13, 2019

Wetlands

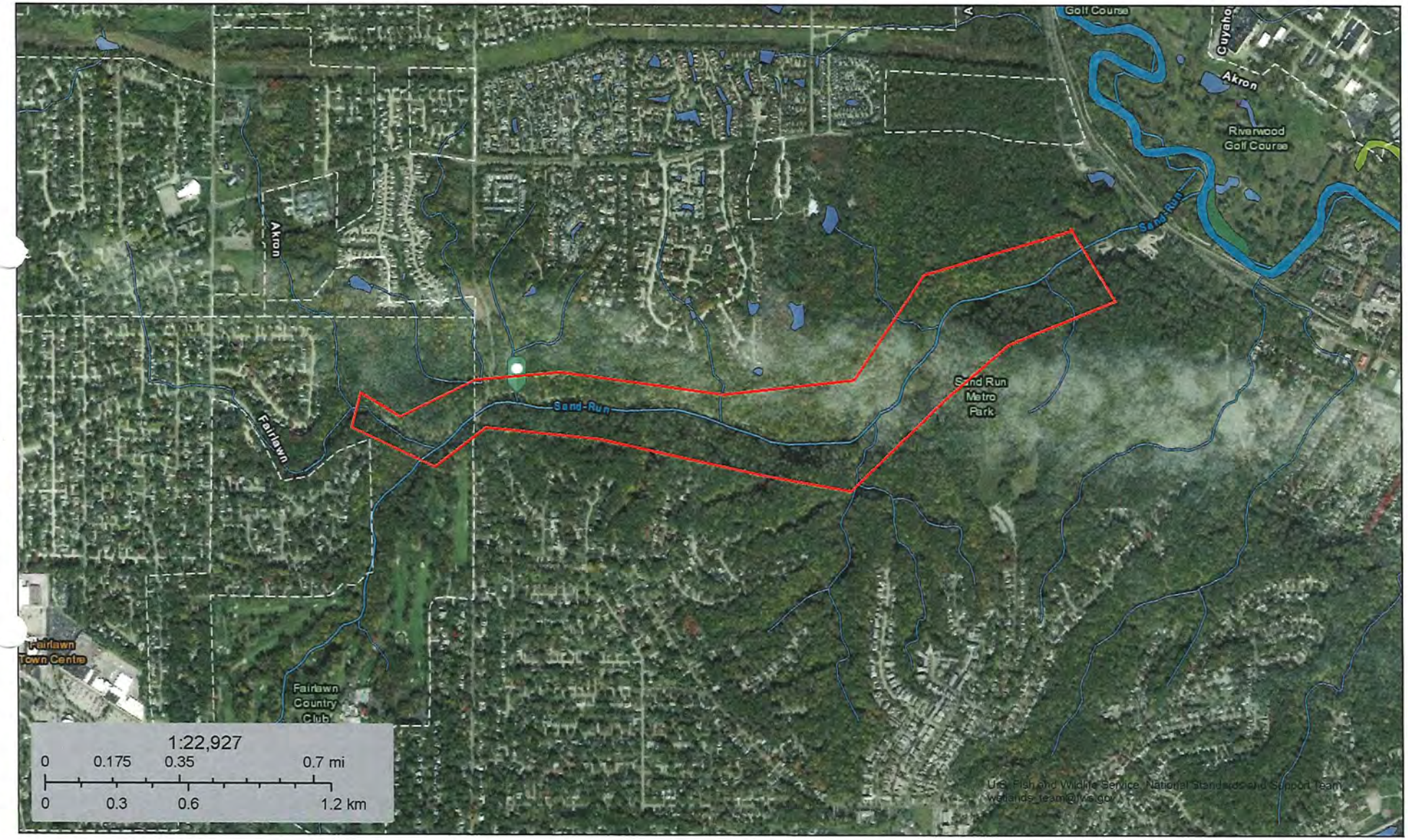
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

U.S. Fish and Wildlife Service

National Wetlands Inventory

Sand Run Metro Park_Wetlands Map



February 13, 2019

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Seeley, Melissa

From: Dardinger, Heather
Sent: Tuesday, August 27, 2019 2:58 PM
To: 'Mike Johnson'
Subject: FW: Sand Run Permitting (UNCLASSIFIED)
Attachments: SnipImage.jpg; OH NWP 3-Maintenance.pdf; Exhibit 3 - Site Location.pdf

Categories: Filed by Newforma

Mike,

Please see below for the email authorization for the use of NWP 3 for Sites 1, 8, 11, 13, 14 and Culvert 41 in Sand Run Metro Park. Please retain this email and the attached documents for your records. A copy of the NWP should also be kept onsite during construction. The NWP 13 for Sites 7 and 12 has been submitted to the Corps.

Thanks,
Heather

From: Wetzel, Paul F CIV USARMY CELRB (USA) <Paul.F.Wetzel@usace.army.mil>
Sent: Tuesday, August 27, 2019 2:40 PM
To: Hoyng, Patrick <phoyng@emht.com>
Subject: RE: Sand Run Permitting (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

Hi Pat,

This pertains to the for Sites 1, 8, 11, 13, 14 and Culvert 41 projects to be completed by the Summit Metro Parks as described your email below. They are proposing to complete stream improvements at eight separate sites along a 0.75-mile stretch of Sand Run and an unnamed tributary to Sand Run, located between North Revere Road and Sand Run Road

Under Section 404 of the Clean Water Act, the U.S. Army Corps of Engineers regulates the discharge of dredged or fill material into waters of the United States, including freshwater wetlands.

Although a permit is required for the discharge of fill material below the OHWM of Sand Run, the projects are authorized under nationwide permit (NWP) 3, and there is no preconstruction notification (PCN) required unless there are historic properties or endangered species issues. No PCN required means that you do not need to submit an application and receive a written NWP verification prior to commencing with work below the OHWM of the creek.

Finally, Sites 1, 8, 11, 13, 14 and Culvert 41 projects do not require an individual 401 water quality certification (WQC) because this is not required for NWP 3 even though located in the Ohio EPA possibly eligible area on the Ohio EPA eligibility map (see attached). I also attached a copy of NWP 3 for your information and use.

Please let me know if you have any questions.

Thanks,

Paul Wetzel, Biologist
U.S. Army Corps of Engineers, Buffalo District

Oak Harbor Field Office
240 Lake Street, Unit D
Oak Harbor, Ohio 43449
Email: paul.f.wetzel@usace.army.mil
(419) 898-3812
Fax (419) 898-4292

From: Hoyng, Patrick [mailto:phoyng@emht.com]
Sent: Tuesday, July 30, 2019 9:36 AM
To: Wetzel, Paul F CIV USARMY CELRB (USA) <Paul.F.Wetzel@usace.army.mil>
Subject: [Non-DoD Source] Sand Run Permitting

Hi Paul,

I have a project located in the Cities of Fairlawn and Akron, Summit County, Ohio. Summit Metro Parks is proposing to complete stream improvements at eight separate sites along a 0.75-mile stretch of Sand Run and an unnamed tributary to Sand Run, located between North Revere Road and Sand Run Road (See attached map). The stream improvements include stream bank repair, streambank/culvert maintenance and a small amount of stream restoration. The sites are summarized below with estimated NWP:

Site 1: Soldier pile retaining wall and RCP downstream of existing culvert (approx. 92' impact) – NWP #3
Site 7: Slope regrading and natural stone RCP (approx. 80' impact) – NWP #27
Site 8: Removal of gabion baskets and natural channel design stream restoration (approx. 150' impact) – NWP #27
Site 11: Replace culvert headwall, install RCP apron, regrade slope and install RCP downstream of existing culvert (approx. 90' impact) – NWP #3
Site 12: Bank Stabilization with dumped rock fill (approx. 90' impact) – NWP #13
Site 13: Repair existing gabion walls with grout (approx. 360' impact) – NWP #3
Site 14: Remove existing gabion wall and install concrete block wall (approx. 40' impact) – NWP #13
Culvert 41: Replace culvert, remove collapsed wall, install concrete block wall and RCP (approx. 290' impact) – NWP #3

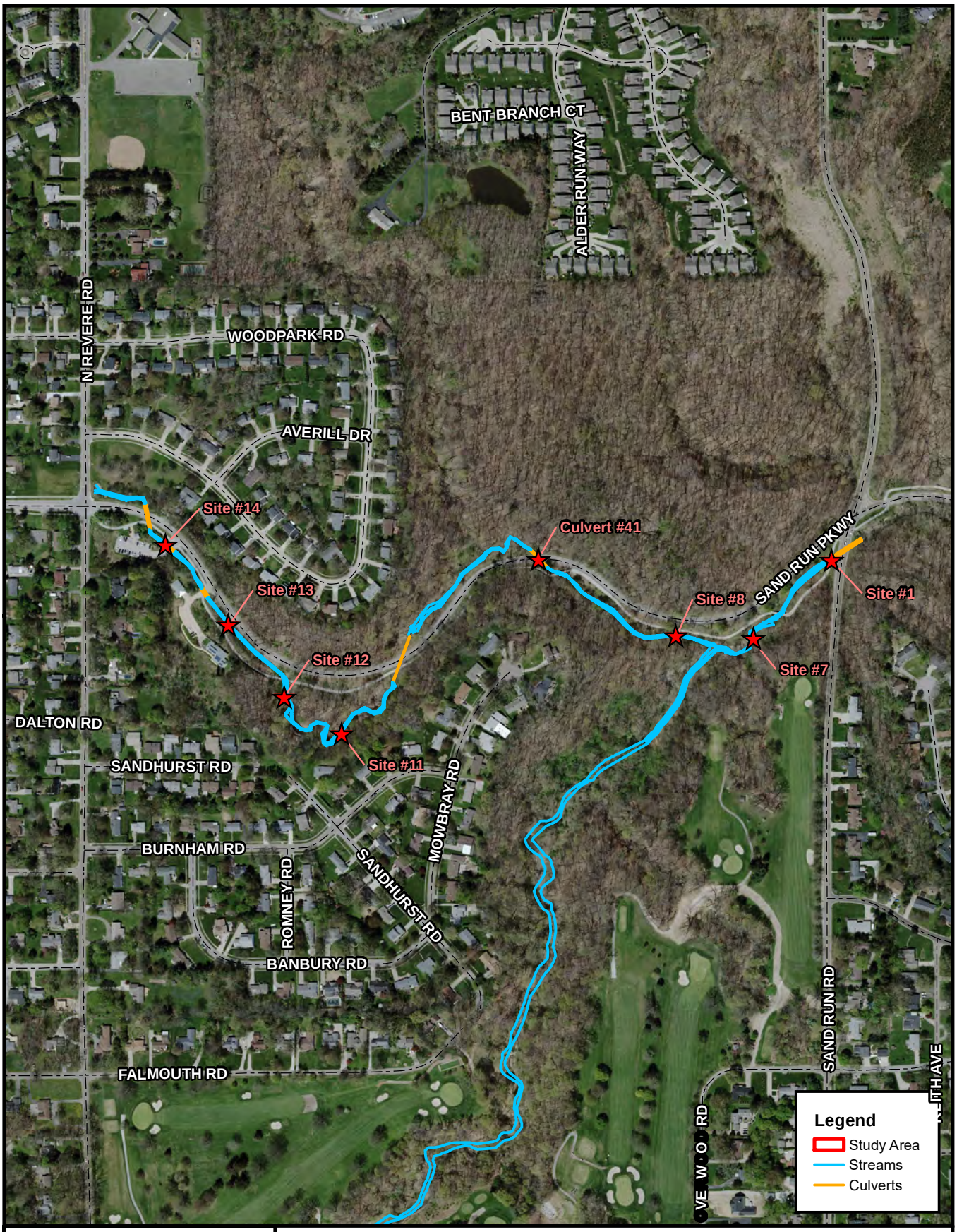
I wanted to get your thoughts on how I should submit the NWP applications. Should I submit all in one encompassing application, separate out into three application for like permits or combine 3/13 and then submit under two separate applications for 3/13 and 27? My other thought would there be any way of submitting all under a NWP #3 or NWP #27 application? Let me know what you think and the best approach for permit application submittal. Thanks

Pat

Patrick Hoyng, CPG
Senior Environmental Scientist

EMH&T Engineers, Surveyors, Planners, Scientists
5500 New Albany Road, Columbus, OH 43054
v. 614.775.4508 | PHoyng@emht.com
emht.com

CLASSIFICATION: UNCLASSIFIED



Path: J:\20190777\GIS\Exhibit 3 - Site Location.mxd

EMH&T
Engineers • Surveyors • Planners • Scientists
5500 New Albany Road, Columbus, OH 43054
Phone: 614.775.4500 Toll Free: 888.775.3648
emht.com

CITY OF AKRON & FAIRLAWN, SUMMIT COUNTY, OHIO

Sand Run
Site Location
Exhibit 3

SCALE: 1" = 500'

0 250 500 1,000 Feet

N

Source: Aerial - OSIP, 2013

Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

Re: DA Sand Run Unnamed Tributary Stabilization
Permit - Intermediate
Approval
401 Wetlands
Summit
DSW401196514

9489 0090 0027 6053 8236 30

CERTIFIED

January 2, 2020

Mike Johnson
Natural Resource Management
Summit Metro Parks
975 Treaty Line Road
Akron, OH 44313

Subject: Approval of a Director's Authorization Application to Exceed 401 WQC Thresholds of Nationwide Permit (NWP) No. 13
DA Sand Run Unnamed Tributary Stabilization
Corps Project No. 2013-00787
Ohio EPA ID No. 196514

Dear Mr. Johnson:

On October 2, 2019, the Ohio Environmental Protection Agency (Ohio EPA) received a Director's Authorization application to exceed thresholds listed under the 401 Water Quality Certification (WQC) for Nationwide Permit (NWP) No. 13, issued on March 17, 2017. Subsequent information was submitted on December 4, 2019. You requested to impact 80 linear feet of stream on Sand Run and 90 linear feet on an unnamed tributary to Sand Run for stream bank stabilization projects. The projects are in the cities of Fairlawn and Akron, Summit County.

In accordance with Part One (D)(1) of the 401 WQC certifying the NWPs, based upon the information provided in the application, Ohio EPA has determined that the impacts to water quality are minimal. An individual 401 WQC is not necessary provided all other terms and conditions of the 401 WQC certifying the NWPs have been met. This Director's Authorization shall remain valid and in effect as long as the 2017 NWPs are in effect.

For your reference a copy of the 401 WQC for the 2017 Nationwide Permits is available online at:
http://www.epa.ohio.gov/Portals/35/401/Final%20Signed%20401%20WQC%20NWP%202017.pdf.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Treasurer, State of Ohio," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad St, 4th Floor
Columbus, Ohio 43215

Sincerely,

Laurie A. Stevenson
Director

jcl

ec: Mark Scalabrino, Department of the Army, Buffalo District, Corps of Engineers
mark.w.scalabrino@usace.army.mil
Patrick Hoyng, EMHT phoyng@emht.com

EMH&T

Engineers, Surveyors, Planners, Scientists

October 1, 2019

Ohio EPA
Division of Surface Water
Attn: 401/IWP/Mitigation Section Manager
P.O. Box 1049
Columbus, Ohio 43216-1049

Subject: Application for Ohio EPA Director's Authorization
Sites #7 and #12 Bank Stabilization Projects in Sand Run Metro Park, Summit County, Ohio

Dear Jeff,

On behalf of Summit Metro Parks, please find the enclosed request for a Director's Authorization for the Site #7 and Site #12 Bank Stabilization Projects within the Sand Run Metro Park, located in the Cities of Fairlawn and Akron, Summit County, Ohio. Summit Metro Parks is proposing to complete bank stabilization along portions of Sand Run and an Unnamed Tributary to Sand Run at two sites (Sites #7 and #12) within the Sand Run Metro Park.

The proposed stabilization projects were designed to repair/stabilize the existing banks at two (2) sites along Sand Run and an Unnamed Tributary to Sand Run, permanently impacting the least amount of stream channel as possible. The proposed stabilization projects will require permanent impacts to 80 linear feet (0.001 acre) of perennial stream (Sand Run) and 90 linear feet (0.002 acre) of perennial stream (Unnamed Tributary to Sand Run). No impacts to wetlands are proposed as a part of these projects.

The USACE issued an email on September 17, 2019 indicating the project is authorized under NWP and no PCN is required. **The proposed stream impacts are located within catchment areas designated as "possibly eligible" for the Ohio EPA 401 Water Quality Certification for the Nationwide Permits.** Summit Metro Parks is applying for an Ohio EPA Director's Authorization (DA) to impact streams determined to be high quality using the Appendix C HHEI flowchart. Impacts to these streams will be minimal and unlikely to result in significant adverse water quality impacts to downstream aquatic resources. These impacts will also reduce sedimentation within the streams by repairing/stabilizing currently unstable areas of streambank.

A copy of the Director's Authorization Request Form has been provided, as has the payment associated with the DA request review fee. In addition, we have provided a copy of the PCN, the email from the USACE, and supporting documentation required for a Director's Authorization Request.

We appreciate your review of the project. If you have any questions or require additional information related to this request, please contact me at (614) 775-4508 or via email at phoyng@emht.com.

Sincerely,

Patrick J. Hoyng, CPG
Senior Environmental Scientist

Enclosures

Copies: Mr. Mike Johnson, Summit Metro Parks

Hoyng, Patrick

From: Wetzel, Paul F CIV USARMY CELRB (USA) <Paul.F.Wetzel@usace.army.mil>
Sent: Tuesday, September 17, 2019 10:09 AM
To: Hoyng, Patrick
Cc: Jeffrey.Boyles@epa.ohio.gov
Subject: RE: Summit Metro Parks NWP 13 PCN Application (UNCLASSIFIED)
Attachments: 404 WQC elig map-SnipImage.JPG; NWP 13 PCN Application Document-Sand Run.pdf; OH NWP 13-Bank Stabilization.pdf

CLASSIFICATION: UNCLASSIFIED

Hi Pat,

Correct me if I am wrong, but isn't the project located in the possibly eligible area (yellow) of the 401 Water Quality Certification for Nationwide Permit Eligibility map (see attached)? Have you checked with OEPA to see if a 401 WQC is going to be required?

I am juggling 24 permit actions at this time and when a NWP application lands on my desk, the first thing I check is whether a PCN is required or not, I don't want to verify a NWP if it is not required. As we discussed and exchanged emails regarding this project, we concluded that it is authorized under NWP 13 and no PCN is required. I don't issue NWP's, they are already issued nationwide by the Corps. I only send letters verifying that the project is authorized under NWP and provide a copy of the NWP. If Ohio EPA absolutely must have a copy of the permit, I would hope that this email and the attached NWP 13 would suffice, as I am verifying that your project is authorized under NWP 13 and no PCN is required. If PCN would have been required, I would verify the NWP 13 provisionally pending the 401 WQC.

If you absolutely need a formal letter, I will get to it as soon as possible, there are many in the queue ahead of this application.

Thanks,

Paul Wetzel, Biologist
U.S. Army Corps of Engineers, Buffalo District Oak Harbor Field Office
240 Lake Street, Unit D
Oak Harbor, Ohio 43449
Email: paul.f.wetzel@usace.army.mil
(419) 898-3812
Fax (419) 898-4292

From: Hoyng, Patrick [mailto:phoyng@emht.com]
Sent: Monday, September 16, 2019 5:27 PM
To: Wetzel, Paul F CIV USARMY CELRB (USA) <Paul.F.Wetzel@usace.army.mil>
Subject: [Non-DoD Source] RE: Summit Metro Parks NWP 13 PCN Application

Hey Paul,

Just checking on how the NWP 13 application review is coming? I need to give our client an update on the progress of the permit review. Let me know. Thanks.

Pat

From: Hoyng, Patrick
Sent: Monday, August 26, 2019 2:52 PM
To: 'Wetzel, Paul F CIV USARMY CELRB (USA)' <Paul.F.Wetzel@usace.army.mil>
Subject: Summit Metro Parks NWP 13 PCN Application

Hey Paul,

Attached is a pdf of the NWP 13 PCN application for the bank stabilization projects being proposed by Summit Metro Parks along Sand Run and a tributary of Sand Run for your review. After reviewing, let me know if you have any questions or need additional information. Also let me know if you need a bound hardcopy of this document. Thanks

Pat

Patrick Hoyng, CPG
Senior Environmental Scientist

EMH&T Engineers, Surveyors, Planners, Scientists
5500 New Albany Road, Columbus, OH 43054 v. 614.775.4508 | PHoyng@emht.com emht.com

CLASSIFICATION: UNCLASSIFIED

401 Water Quality Certification for Nationwide Permit Eligibility

Ohio EPA Division of Surface Water

Sand Run Metro Park, 1476 Smi

Show search results for Sand Run Me...

Akron

Akron

Ineligible

Fairlawn

Possibly Eligible

Sand Run

Fairlawn

600ft

-81.590 41.137 Degrees

Division of Surface Water, Ohio EPA | USDA FSA | Esri, HERE, Garmin, iPC

POWERED BY esri

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

July 14, 2020

REPLY TO THE ATTENTION OF:
Mail Code RM-19J

Duane D. Castaldi
Regional Environmental Officer
Federal Emergency Management Agency, Region 5
U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

Re: Scoping Comments for the Sand Run Stabilization and Infrastructure Improvement Project, Summit County, Ohio

Dear Mr. Castaldi:

The U.S. Environmental Protection Agency has reviewed the Environmental Assessment (EA) Scoping Document, dated June 15, 2020, for the project referenced above. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Federal Emergency Management Agency (FEMA) is the lead agency under NEPA, and Summit Metro Parks is the project applicant.

The project responds to numerous safety and ecological concerns that have resulted from increased erosion, tree loss, and flooding along Sand Run. The Proposed Action, as defined in the Scoping Document, includes (1) stream stabilization, (2) culvert improvements, and (3) creation of a fish passage. All proposed activities would occur on Sand Run and an unnamed tributary to Sand Run. To assist FEMA in addressing the project need in a manner that best protects human health and the environment, EPA offers the enclosed: (1) Detailed Scoping Comments and (2) Construction Emission Control Checklist.

Thank you for the opportunity to review this project. When the subsequent NEPA document becomes available, please send an electronic copy to Jen Tyler, the lead reviewer for this project, at tyler.jennifer@epa.gov. Ms. Tyler is also available at 312-886-6394.

Sincerely,

Kenneth A. Westlake
Deputy Director, Tribal and Multimedia Programs Office
Office of the Regional Administrator

Enclosures: (1) Detailed Scoping Comments, (2) Construction Emission Control Checklist

ENCLOSURE 1: EPA'S SCOPING COMMENTS FOR THE SAND RUN STABILIZATION AND INFRASTRUCTURE IMPROVEMENT PROJECT, SUMMIT COUNTY, OHIO

Project Description and Affected Environment

Detailed descriptions of the proposed action and the affected environment are needed within the EA in order to understand the proposal's impacts on natural resources and communities.

Recommendations for the EA:

- Include a Purpose and Need statement that meets the requirements of the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR § 1502.13).
- Evaluate all reasonable alternatives, in line with the CEQ NEPA Regulations (40 CFR § 1502.14).
- Include detailed descriptions of the resources and communities that may be impacted by the proposed project. Include photos, figures, and maps.
- For each alternative, describe actions that would be taken, specify activities that would occur in-water vs. out of the water, and describe materials that would be used.
- Visually depict each project alternative. Include staging areas, among other features.

Aquatic resources

It is important for the EA to take a hard look at potential impacts to aquatic resources, disclose such impacts to the public, and identify appropriate avoidance, minimization, and mitigation measures.

Recommendations for the EA:

- Describe the existing water quality in the project area, including all impairments under Section 303(d) of the Clean Water Act (CWA).
- Analyze and disclose potential permanent, temporary, direct, indirect and cumulative impacts to aquatic resources.
- For any proposed fill to Waters of the U.S., include a level of information and analysis adequate to support compliance with the CWA Section 404(b)(1) Guidelines, including alternatives and mitigation sequencing requirements. Discuss efforts to first avoid, then minimize, and finally compensate for those impacts that cannot be avoided or minimized.
- Discuss the CWA Section 401 Water Quality Certification.
- Describe best practices for protecting water quality during project construction, such as performing work outside of the stream and tributary when possible.

Climate Resiliency

The National Climate Assessment[1] finds that, in the Midwest, extreme heat, heavy downpours, and flooding will affect infrastructure. The Scoping Document explains, "Culvert structures will be upgraded to meet the Summit Metro Parks hydraulic conveyance level of service, which is based on the Ohio Department of Transportation design criteria for the 25-year design storm" (page 3). A rationale supporting the selection of the design storm year within the EA would provide readers with an understanding of (1) how the project is likely to withstand large storm events and (2) what types of associated environmental impacts may occur.

[1] U.S. Global Change Research Program, 2017 Climate Science Special Report: Fourth National Climate Assessment, Volume 1, available at: https://www.globalchange.gov/browse/reports

Recommendations for the EA:

- Document trends in occurances of severe storm events in the project area.
- Include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project area and the project, including its infrastructure. This could help inform measures to improve the resilience of the proposed project.
- Provide a rationale to support the section of the design storm year for hydraulic conveyance level of service to help promote optimal performance of culverts.
- Consider resiliency and adaptation measures or plans to promote high performance of project elements under changing heat and precipitation conditions. Describe how such information is being incorporated into the project. See EPA's Adaptation Resource Center[2] for assistance.

Species and Ecosystem Health

Section 7 of the Endangered Species Act (ESA) directs all federal agencies to ensure that any action they authorize, fund, or carry-out does not jeopardize the continued existence of a threatened or endangered species or proposed or designated critical habitat. Implementing regulations found at 50 CFR Part 402 specify how federal agencies are to fulfill their ESA Section 7 consultation requirements.

The proposed project could introduce non-native invasive species. Early recognition and control of infestations is essential to stopping the spread of invasive plants and insects without widespread chemical use, which may have adverse impacts on biodiversity and water quality.

Recommendations for the EA:

- Use the U.S. Fish and Wildlife Service (FWS) "Information for Planning and Conservation" tool to obtain a list of trust resources in the project area. The list would include species that are threatened or endangered under ESA, candidate species for listing, critical habitat, and migratory birds protected under the Migratory Bird Treaty Act.[3]
- Determine whether the proposed action may affect trust resources. If trust resources may be affected, engage in consultation with U.S. Fish and Wildlife Service. Document coordination and formal consultation in the EA, with the goal of aligning NEPA and ESA Section 7 consultation processes.
- Determine whether any state-listed species could be impacted by the proposed project, and document any coordination with the Ohio Department of Natural Resources in the EA.
- Discuss consideration of wildlife crossings in the design of culverts.
- Describe how the project would meet the requirements of Executive Order 13112 on invasive species.
- Require the construction contractor to wash equipment prior to contact with waters and unpaved areas to reduce the likelihood of spreading invasive species.
- Revegetate all disturbed green spaces, including staging areas, after the project is complete. Use native species and pollinator friendly plants whenever feasible.
- Commit to planting trees to offset tree loss at a ratio of 1:1 or greater.

[2] EPA's Climate Adaptation Resource Center, available at: https://www.epa.gov/arc-x

[3] FWS Information for Planning and Conservation (IPaC) tool is available at: https://ecos.fws.gov/ipac/

Tribal Cultural Resources and National Historic Preservation Act (NHPA)

NHPA Section 106 is concerned with impacts to historic properties, defined as properties that are listed, or may be eligible for listing, on the National Register of Historic Places (National Register). These may include prehistoric or historic districts, sites, buildings, structures, objects, or properties of traditional religious and cultural importance to a tribe.

Recommendations for the EA:

- Consult with appropriate tribal governments and indigenous organizations to identify any cultural resources that may be impacted by the proposed project. Document this consultation in the EA and identify mitigation measures, if applicable.
- Coordinate with the Ohio State Historic Preservation Officer and any applicable Tribal Historic Preservation Officers and/or appropriate tribal representatives.
- In the EA, include documentation of compliance with Section 106 of NHPA.

Air Quality and Traffic Safety

The proposed project would result in emissions from construction equipment. Temporary construction emissions have the potential to impact human health, especially in sensitive populations, such as elderly people, children, and those with impaired respiratory systems.

Recommendations for the EA:

- Discuss potential emissions sources from the construction phase of the proposed project. Consider: truck trips, demolition, and use of construction equipment.
- Discuss whether construction emissions could impact nearby people. Consider potential local health effects from construction emissions, including childhood asthma and other respiratory illnesses that can be triggered by short-term elevated emission levels.
- Identify and commit to specific measures to reduce construction emissions. Options include: (1) requiring dust suppressant strategies, such as use of tarps, (2) limiting idling time for construction trucks and heavy equipment, and (3) soliciting bids that require zero-emission technologies or advanced emission control systems. See additional best practices in the enclosed Construction Emission Control Checklist.
- Prior to construction, require a construction traffic management plan to ensure that trucks hauling materials and heavy machinery avoid areas where children congregate when possible. Route construction truck traffic away from schools, daycares and parks when possible, and use crossing guards when such areas cannot be avoided.

Contamination

Unknown contamination could potentially be discovered during earth-moving activities.

Recommendations for the EA:

In the EA, discuss procedures for contractors to identify, manage, and dispose of contamination if any should be found. In addition, consider providing information to promote workers' ability to identify and address hazards.

ENCLOSURE 2

U.S. Environmental Protection Agency
Construction Emission Control Checklist

Consider measures that apply to the proposed project from the following list.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).[4]
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).[5]
- Locomotives: Locomotives servicing infrastructure sites should meet, or exceed, the U.S. EPA Tier 4 exhaust emissions standards for line-haul and switch locomotive engines where possible.[6]
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest U.S. EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).[7]
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.

[4] http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm
[5] http://www.epa.gov/otaq/standards/nonroad/nonroadci.htm
[6] http://www.epa.gov/otaq/standards/nonroad/locomotives.htm
[7] http://www.epa.gov/otaq/standards/nonroad/marineci.htm

- Repower older vehicles and/or equipment with diesel- or alternatively fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.).

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
Phone: (614) 416-8993 Fax: (614) 416-8994

In Reply Refer To: May 04, 2020
Consultation Code: 03E15000-2020-SLI-1347
Event Code: 03E15000-2020-E-01922
Project Name: Sand Run Streambank Stabilization

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see http://www.fws.gov/migratorybirds/RegulationsandPolicies.html.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/BirdHazards.html.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit http://www.fws.gov/migratorybirds/AboutUS.html.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
(614) 416-8993

Project Summary

Consultation Code: 03E15000-2020-SLI-1347

Event Code: 03E15000-2020-E-01922

Project Name: Sand Run Streambank Stabilization

Project Type: ** OTHER **

Project Description: Summit Metro Parks has proposed streambank stabilization along Sand Run Parkway within the Sand Run Metro Park. The project will also include 1 culvert replacement. Stream channel improvements include the placement of rock vanes, slope re-grading, sheet pile walls, and recreated the natural stream meanders.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/41.13587377813823N81.56838244809688W

Counties: Summit, OH

Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Indiana Bat *Myotis sodalis* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: ▪ Incidental take of the northern long-eared bat is not prohibited at this location. Federal action agencies may conclude consultation using the streamlined process described at https://www.fws.gov/midwest/endangered/mammals/nleb/s7.html Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Flowering Plants

NAME	STATUS
Northern Wild Monkshood *Aconitum noveboracense* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1450	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ohio Ecological Services Field Office
4625 Morse Road, Suite 104
Columbus, OH 43230-8355
Phone: (614) 416-8993 Fax: (614) 416-8994

In Reply Refer To: May 04, 2020
Consultation Code: 03E15000-2020-TA-1347
Event Code: 03E15000-2020-E-01923
Project Name: Sand Run Streambank Stabilization

Subject: Verification letter for the 'Sand Run Streambank Stabilization' project under the January 5, 2016, Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-eared Bat and Activities Excepted from Take Prohibitions.

Dear Duane Castaldi:

The U.S. Fish and Wildlife Service (Service) received on May 04, 2020 your effects determination for the 'Sand Run Streambank Stabilization' (the Action) using the northern long-eared bat (*Myotis septentrionalis*) key within the Information for Planning and Consultation (IPaC) system. This IPaC key assists users in determining whether a Federal action is consistent with the activities analyzed in the Service's January 5, 2016, Programmatic Biological Opinion (PBO). The PBO addresses activities excepted from "take"[1] prohibitions applicable to the northern long-eared bat under the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based upon your IPaC submission, the Action is consistent with activities analyzed in the PBO. The Action may affect the northern long-eared bat; however, any take that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Unless the Service advises you within 30 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the PBO satisfies and concludes your responsibilities for this Action under ESA Section 7(a)(2) with respect to the northern long-eared bat.

Please report to our office any changes to the information about the Action that you submitted in IPaC, the results of any bat surveys conducted in the Action area, and any dead, injured, or sick northern long-eared bats that are found during Action implementation. If the Action is not completed within one year of the date of this letter, you must update and resubmit the information required in the IPaC key.

This IPaC-assisted determination allows you to rely on the PBO for compliance with ESA Section 7(a)(2) only for the northern long-eared bat. It **does not** apply to the following ESA-protected species that also may occur in the Action area:

- Indiana Bat, *Myotis sodalis* (Endangered)
- Northern Wild Monkshood, *Aconitum noveboracense* (Threatened)

If the Action may affect other federally listed species besides the northern long-eared bat, a proposed species, and/or designated critical habitat, additional consultation between you and this Service office is required. If the Action may disturb bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act is recommended.

---

[1]Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct [ESA Section 3(19)].

Action Description
You provided to IPaC the following name and description for the subject Action.

1. Name

Sand Run Streambank Stabilization

2. Description

The following description was provided for the project 'Sand Run Streambank Stabilization':

> Summit Metro Parks has proposed streambank stabilization along Sand Run Parkway within the Sand Run Metro Park. The project will also include 1 culvert replacement. Stream channel improvements include the placement of rock vanes, slope re-grading, sheet pile walls, and recreated the natural stream meanders.

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/41.13587377813823N81.56838244809688W

Determination Key Result

This Federal Action may affect the northern long-eared bat in a manner consistent with the description of activities addressed by the Service's PBO dated January 5, 2016. Any taking that may occur incidental to this Action is not prohibited under the final 4(d) rule at 50 CFR §17.40(o). Therefore, the PBO satisfies your responsibilities for this Action under ESA Section 7(a)(2) relative to the northern long-eared bat.

Determination Key Description: Northern Long-eared Bat 4(d) Rule

This key was last updated in IPaC on May 15, 2017. Keys are subject to periodic revision.

This key is intended for actions that may affect the threatened northern long-eared bat.

The purpose of the key for Federal actions is to assist determinations as to whether proposed actions are consistent with those analyzed in the Service's PBO dated January 5, 2016.

Federal actions that may cause prohibited take of northern long-eared bats, affect ESA-listed species other than the northern long-eared bat, or affect any designated critical habitat, require ESA Section 7(a)(2) consultation in addition to the use of this key. Federal actions that may affect species proposed for listing or critical habitat proposed for designation may require a conference under ESA Section 7(a)(4).

Determination Key Result

This project may affect the threatened Northern long-eared bat; therefore, consultation with the Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.) is required. However, based on the information you provided, this project may rely on the Service's January 5, 2016, *Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions* to fulfill its Section 7(a)(2) consultation obligation.

Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?

   Yes

2. Have you determined that the proposed action will have "no effect" on the northern long-eared bat? (If you are unsure select "No")

   No

3. Will your activity purposefully **Take** northern long-eared bats?

   No

4. Is the project action area located wholly outside the White-nose Syndrome Zone?

   Automatically answered
   No

5. Is the project action area located within 0.25 miles of a known northern long-eared bat hibernaculum?

   Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency

   Automatically answered
   No

6. Is the project action area located within 150 feet of a known occupied northern long-eared bat maternity roost tree?

   Note: The map queried for this question contains proprietary information and cannot be displayed. If you need additional information, please contact your State wildlife agency

   Automatically answered
   No

Project Questionnaire

If the project includes forest conversion, report the appropriate acreages below. Otherwise, type ‘0’ in questions 1-3.

1. Estimated total acres of forest conversion:

0

2. If known, estimated acres of forest conversion from April 1 to October 31

0

3. If known, estimated acres of forest conversion from June 1 to July 31

0

If the project includes timber harvest, report the appropriate acreages below. Otherwise, type ‘0’ in questions 4-6.

4. Estimated total acres of timber harvest

0

5. If known, estimated acres of timber harvest from April 1 to October 31

0

6. If known, estimated acres of timber harvest from June 1 to July 31

0

If the project includes prescribed fire, report the appropriate acreages below. Otherwise, type ‘0’ in questions 7-9.

7. Estimated total acres of prescribed fire

0

8. If known, estimated acres of prescribed fire from April 1 to October 31

0

9. If known, estimated acres of prescribed fire from June 1 to July 31

0

If the project includes new wind turbines, report the megawatts of wind capacity below. Otherwise, type ‘0’ in question 10.

10. What is the estimated wind capacity (in megawatts) of the new turbine(s)?
0

From: Applegate, Jeromy
To: Clevidence, Daniel
Subject: Re: [EXTERNAL] Information Request - Bald Eagle nest HMGP Summit Metro Parks – Sand Run Parkway Protection Project
Date: Friday, February 22, 2019 10:01:18 AM
Attachments: image001.png

Dan,

FWS does not have any records of a bald eagle nest within 0.5 mile of the properties in your trailing email.

Jeromy Applegate
Fish and Wildlife Biologist
U S Fish and Wildlife Service
Ohio Ecological Services Field Office
4625 Morse Rd., Suite 104
Columbus, OH 43230
Phone: 614-416-8993 ext. 21
FAX: 614-416-8994

On Wed, Feb 13, 2019 at 3:42 PM DTClevidence@dps.ohio.gov <DTClevidence@dps.ohio.gov> wrote:

> Good afternoon Jeromy,
>
> The Ohio Emergency Management Agency is requesting information on Bald Eagle nests that may be located within ½ mile of a proposed project site. The project is for a culvert replacement and to restore and stabilize several sections of stream channel adjacent to Sand Run Parkway to mitigate future roadway damage through the Federal Emergency Management Agency's (FEMA) Hazard Mitigation Assistance (HMA)Grant Program. According to our Memorandum of Agreement, please check your data to confirm that no Bald Eagle nests are within ½ mile of the property included on the property listing below.

ID	Property Owner	Address	Land Use	Parcel Number
1	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.133730 / Long: -81.577700	Park Land	6709023
		975 TREATY LINE		

2	Metro Parks Serving Summit County	RD AKRON, OH 44313 Lat: 41.136590 / Long: -81.564530	Park Land	7000555
3	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.132980 / Long: -81.591580	Park Land	1000104
4	Metro Parks Serving Summit County	975 TREATY LINE RD AKRON, OH 44313 Lat: 41.133120 / Long: -81.595850	Park Land	0903813

I am attaching a topographical map and street map detailing the current project area. The proposed project site is located on the Peninsula Quadrangle. If possible, Ohio EMA would appreciate your response within the next 30 days. If you require additional information, please contact me at 614/799-3533 or dtclevidence@dps.ohio.gov. Thank you for your assistance.

Respectfully,

Dan Clevidence, CFM

Mitigation Specialist

Ohio Emergency Management Agency

Ohio Department of Public Safety

2855 W. Dublin-Granville Road

Columbus, OH 43235

Email: dtclevidence@dps.ohio.gov

Office: (614) 799-3533

Fax: (614) 799-3526


A SAFER OHIO

Ohio

County Distribution of Federally-Listed Threatened, Endangered, Proposed, and Candidate Species

January 29, 2018

County	Species	Status	Habitat
Adams	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
	Fanshell *(Cyprogenia stegaria)* *(=C. irrorata)*	Endangered	Found in areas of packed sand and gravel at locations in a good current
	Pink mucket pearlymussel *(Lampsilis abrupta)*	Endangered	The lower Ohio River and its larger tributaries
	Rayed bean (*Villosa fabalis*)	Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
	Sheepnose (*Plethobasus cyphyus*)	Endangered	Shallow areas in larger rivers and streams
	Snuffbox (*Epioblasma triquetra*)	Endangered	Small to medium-sized creeks and some larger rivers, in areas with a swift current
	Running buffalo clover *(Trifolium stoloniferum)*	Endangered	Disturbed bottomland meadows; disturbed sites that have shade during part of each day
Allen	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
Ashland	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
Ashtabula	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.

Shelby	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
	Rayed bean (*Villosa fabalis*)	Endangered	Smaller, headwater creeks, but they are sometimes found in large rivers
Stark	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
Summit	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
	Northern monkshood *(Aconitum noveboracense)*	Threatened	Cool, moist, shaded cliff faces or talus slopes in wooded ravines, near water seeps
Trumbull	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
	Eastern massasauga *(Sistrurus catenatus)*	Threatened	Wetlands and adjacent uplands
	Clubshell *(Pleurobema clava)*	Endangered	Found in coarse sand and gravel areas of runs and riffles within streams and small rivers
Tuscarawas	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
Union	Indiana bat (*Myotis sodalis*)	Endangered	Hibernacula = Caves and mines; Maternity and foraging habitat = small stream corridors with well developed riparian woods; upland forests
	Northern long-eared bat *Myotis septentrionalis*	Threatened	Hibernates in caves and mines - swarming in surrounding wooded areas in autumn. During late spring and summer roosts and forages in upland forests.
	Scioto madtom *(Noturus trautmani)*	Endangered	Stream riffles of moderate flow over sandy gravel bottom

Castaldi, Duane

From: Ohio, FW3 <ohio@fws.gov>
Sent: Friday, June 19, 2020 7:42 AM
To: Castaldi, Duane
Cc: Parsons, Kate; nathan.reardon@dnr.state.oh.us
Subject: Summit Metro Parks - Sand Run Streambank Stabilization and Channel Improvements

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

TAILS# 03E15000-2020-TA-1347

Dear Mr. Castaldi,

The U.S Fish and Wildlife Service (Service) has received your recent correspondence requesting information about the subject proposal. We offer the following comments and recommendations to assist you in minimizing and avoiding adverse impacts to threatened and endangered species pursuant to the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq), as amended (ESA).

Federally Threatened and Endangered Species: The endangered Indiana bat (*Myotis sodalis*) and threatened northern long-eared bat (*Myotis septentrionalis*) occur throughout the State of Ohio. The Indiana bat and northern long-eared bat may be found wherever suitable habitat occurs unless a presence/absence survey has been performed to document absence. Suitable summer habitat for Indiana bats and northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and breed that may also include adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, woodlots, fallow fields, and pastures. Roost trees for both species include live and standing dead trees ≥3 inches diameter at breast height (dbh) that have any exfoliating bark, cracks, crevices, hollows and/or cavities. These roost trees may be located in forested habitats as well as linear features such as fencerows, riparian forests, and other wooded corridors. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet of other forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat. In the winter, Indiana bats and northern long-eared bats hibernate in caves, rock crevices and abandoned mines.

Seasonal Tree Clearing for Federally Listed Bat Species: Should the proposed project site contain trees ≥3 inches dbh, we recommend avoiding tree removal wherever possible. If any caves or abandoned mines may be disturbed, further coordination with this office is requested to determine if fall or spring portal surveys are warranted. If no caves or abandoned mines are present and trees ≥3 inches dbh cannot be avoided, we recommend removal of any trees ≥3 inches dbh only occur between October 1 and March 31. Seasonal clearing is recommended to avoid adverse effects to Indiana bats and northern long-eared bats. While incidental take of northern long-eared bats from most tree clearing is exempted by a 4(d) rule (see

http://www.fws.gov/midwest/endangered/mammals/nleb/index.html), incidental take of Indiana bats is still prohibited without a project-specific exemption. Thus, seasonal clearing is recommended where Indiana bats are assumed present.
If implementation of this seasonal tree cutting recommendation is not possible, a summer presence/absence survey may be conducted for Indiana bats. If Indiana bats are not detected during the survey, then tree clearing may occur at any time of the year. Surveys must be conducted by an approved surveyor and be designed and conducted in coordination with the Ohio Field Office. Surveyors must have a valid federal permit. Please note that in Ohio summer mist net surveys may only be conducted between June 1 and August 15.

Section 7 Coordination: If there is a federal nexus for the project (e.g., federal funding provided, federal permits required to construct), then no tree clearing should occur on any portion of the project area until consultation under section 7 of the ESA, between the Service and the federal action agency, is completed. We recommend the federal action agency submit a determination of effects to this office, relative to the Indiana bat and northern long-eared bat, for our review and concurrence. This letter provides technical assistance only and does not serve as a completed section 7 consultation document.

Stream and Wetland Avoidance: Over 90% of the wetlands in Ohio have been drained, filled, or modified by human activities, thus is it important to conserve the functions and values of the remaining wetlands in Ohio (https://epa.ohio.gov/portals/47/facts/ohio_wetlands.pdf). We recommend avoiding and minimizing project impacts to all wetland habitats (e.g., forests, streams, vernal pools) to the maximum extent possible in order to benefit water quality and fish and wildlife habitat. Additionally, natural buffers around streams and wetlands should be preserved to enhance beneficial functions. If streams or wetlands will be impacted, the U.S. Army Corps of Engineers should be contacted to determine whether a Clean Water Act section 404 permit is required. Best management practices should be used to minimize erosion, especially on slopes. Disturbed areas should be mulched and revegetated with native plant species. In addition, prevention of non-native, invasive plant establishment is critical in maintaining high quality habitats.

Due to the project type, size, and location, we do not anticipate adverse effects to any other federally endangered, threatened, or proposed species, or proposed or designated critical habitat. Should the project design change, or additional information on listed or proposed species or their critical habitat become available, or if new information reveals effects of the action that were not previously considered, coordination with the Service should be initiated to assess any potential impacts.

Thank you for your efforts to conserve listed species and sensitive habitats in Ohio. We recommend coordinating with the Ohio Department of Natural Resources due to the potential for the proposed project to affect state listed species and/or state lands. Contact Mike Pettegrew, Acting Environmental Services Administrator, at (614) 265-6387 or at mike.pettegrew@dnr.state.oh.us.

If you have questions, or if we can be of further assistance in this matter, please contact our office at (614) 416-8993 or ohio@fws.gov.

Sincerely,

Patrice M. Ashfield
Field Office Supervisor

cc: Nathan Reardon, ODNR-DOW
Kate Parsons, ODNR-DOW

Appendix D

Tribal Nation Consultation

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Erin Paden, Historic Preservation Director
Delaware Nation
31064 SH 281
P.O. Box 825
Anadarko, Oklahoma 73005

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Ms. Paden:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Delaware Nation or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally-assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Delaware Nation to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Delaware Nation or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Delaware Nation.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

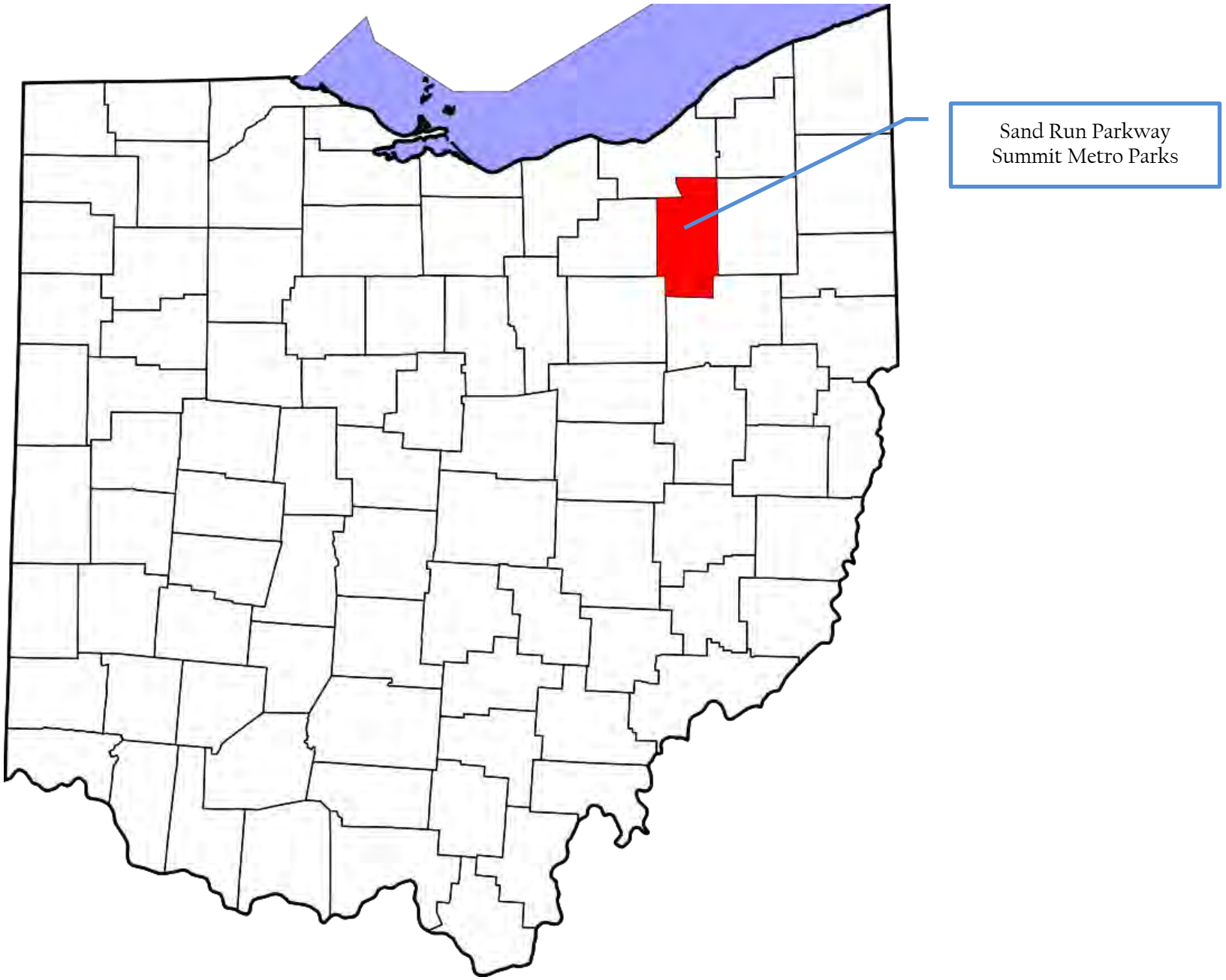
Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

☐ The Delaware Nation has no interest in the area potentially affected by the captioned undertaking.

☐ The Delaware Nation has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Delaware Nation Date


Sand Run Parkway
Summit Metro Parks


Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
SAND RUN PARKWAY
SAND RUN ROAD
REVERE ROAD
Sand Run
To Sand Run
Unnamed Tributary
LEGEND
Culvert Improvement
Stabilization Sites
SOURCE
Imagery: OSIP (April 2011)
SAND RUN PARKWAY MITIGATION PLAN
IHOP APPLICATION
PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Larry Heady, Special Assistant
Delaware Tribe of Indians
Delaware Tribe Historic Preservation Office
1929 East 6th Street
Duluth, MN 55812

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Mr. Heady:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Delaware Tribe of Indians or other Tribes have interests in the areas potentially affected by this undertaking.

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FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Delaware Tribe of Indians or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Delaware Tribe of Indians.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

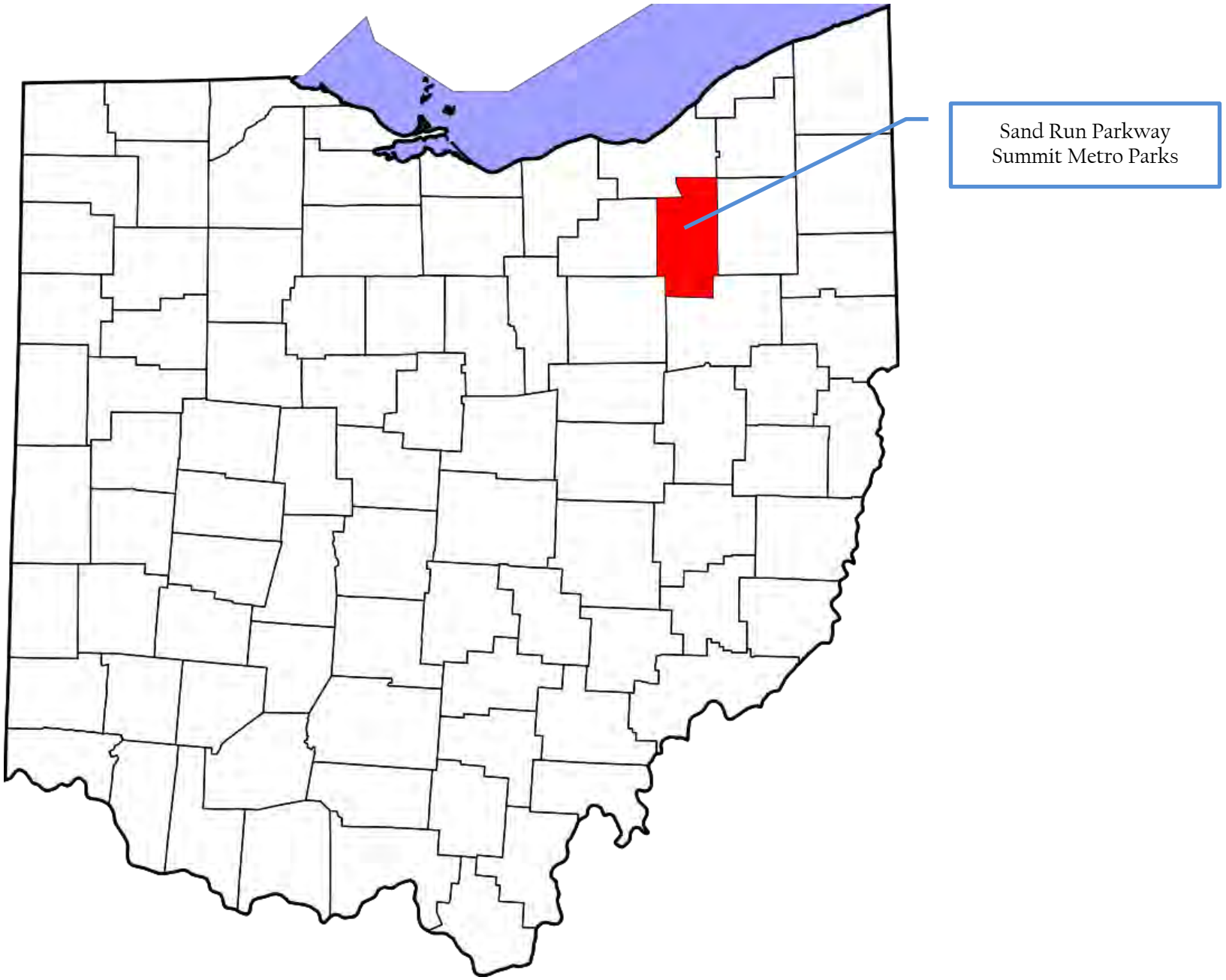
☐ The Delaware Tribe of Indians has no interest in the area potentially affected by the captioned undertaking.

☐ The Delaware Tribe of Indians has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Delaware Tribe of Indians

Date


Sand Run Parkway
Summit Metro Parks


Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
SAND RUN PARKWAY
SAND RUN ROAD
REVERE ROAD
Sand Run
To Sand Run
Unnamed Tributary
LEGEND
Culvert Improvement
Stabilization Sites
SOURCE
Imagery: OSIP (April 2011)
SAND RUN PARKWAY MITIGATION PLAN
IHOP APPLICATION
PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Michael LaRonge, Tribal Historic Preservation Officer
Forest County Potawatomi Community of Wisconsin
Natural Resources Department
5320 Wensaut Lane, PO Box 340
Crandon, Wisconsin 54520

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Mr. LaRonge:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Forest County Potawatomi Community of Wisconsin or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally-assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Forest County Potawatomi Community of Wisconsin to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Forest County Potawatomi Community of Wisconsin or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Forest County Potawatomi Community of Wisconsin.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

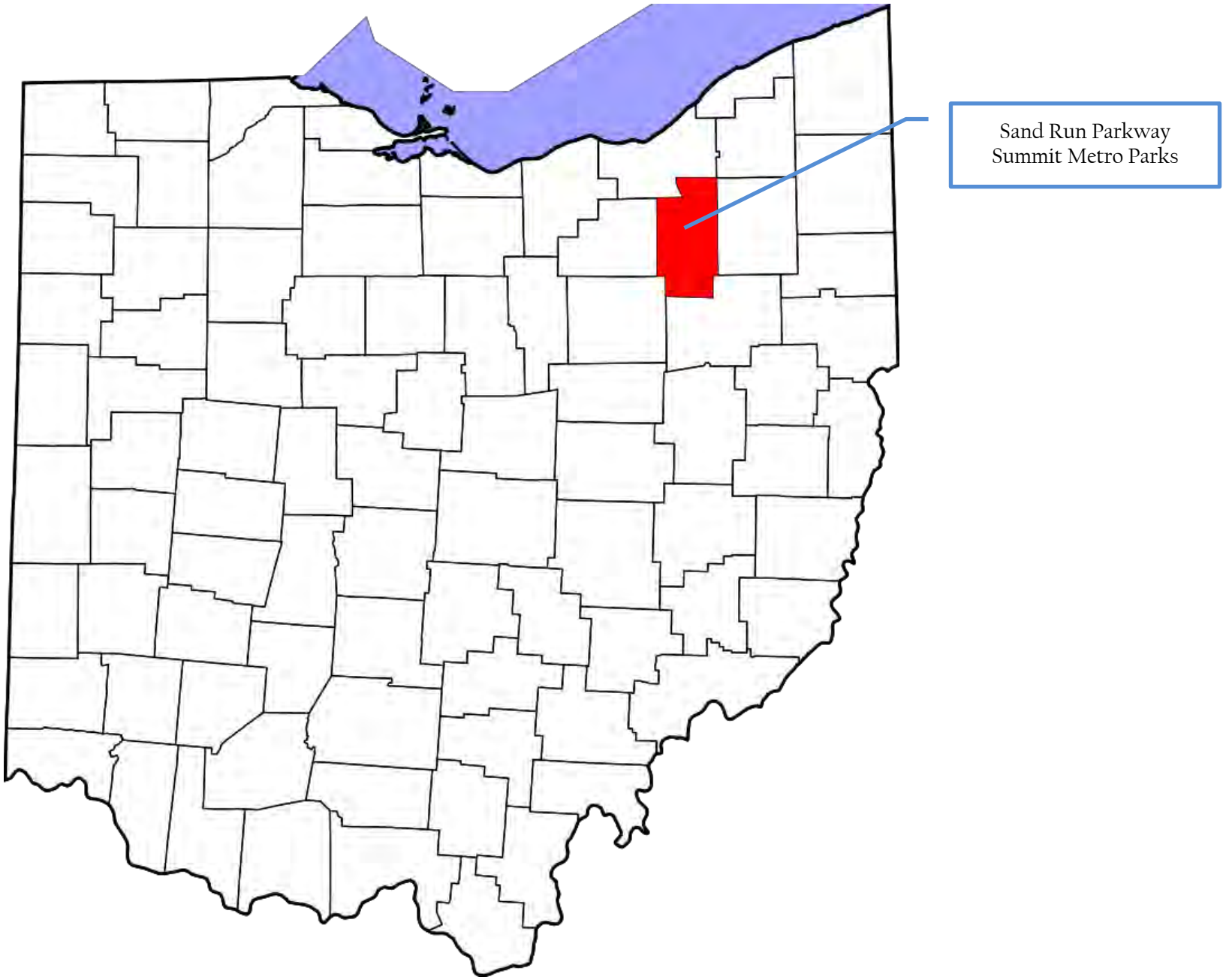
☐ The Forest County Potawatomi Community of Wisconsin has no interest in the area potentially affected by the captioned undertaking.

☐ The Forest County Potawatomi Community of Wisconsin has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Forest County Potawatomi Community of Wisconsin

Date


Sand Run Parkway
Summit Metro Parks


Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
SAND RUN PARKWAY
SAND RUN ROAD
REVERE ROAD
Sand Run
To Sand Run
Unnamed Tributary
LEGEND
Culvert Improvement
Stabilization Sites
SOURCE
Imagery: OSIP (April 2011)
SAND RUN PARKWAY MITIGATION PLAN
IHOP APPLICATION
PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Kenneth Meshigaud, Chairperson
Hannahville Indian Community
N14911 Hannahville B1 Road
Wilson, Michigan 49896-9728

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Chairperson Meshigaud:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Hannahville Indian Community or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally-assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Hannahville Indian Community to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Hannahville Indian Community or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Hannahville Indian Community.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

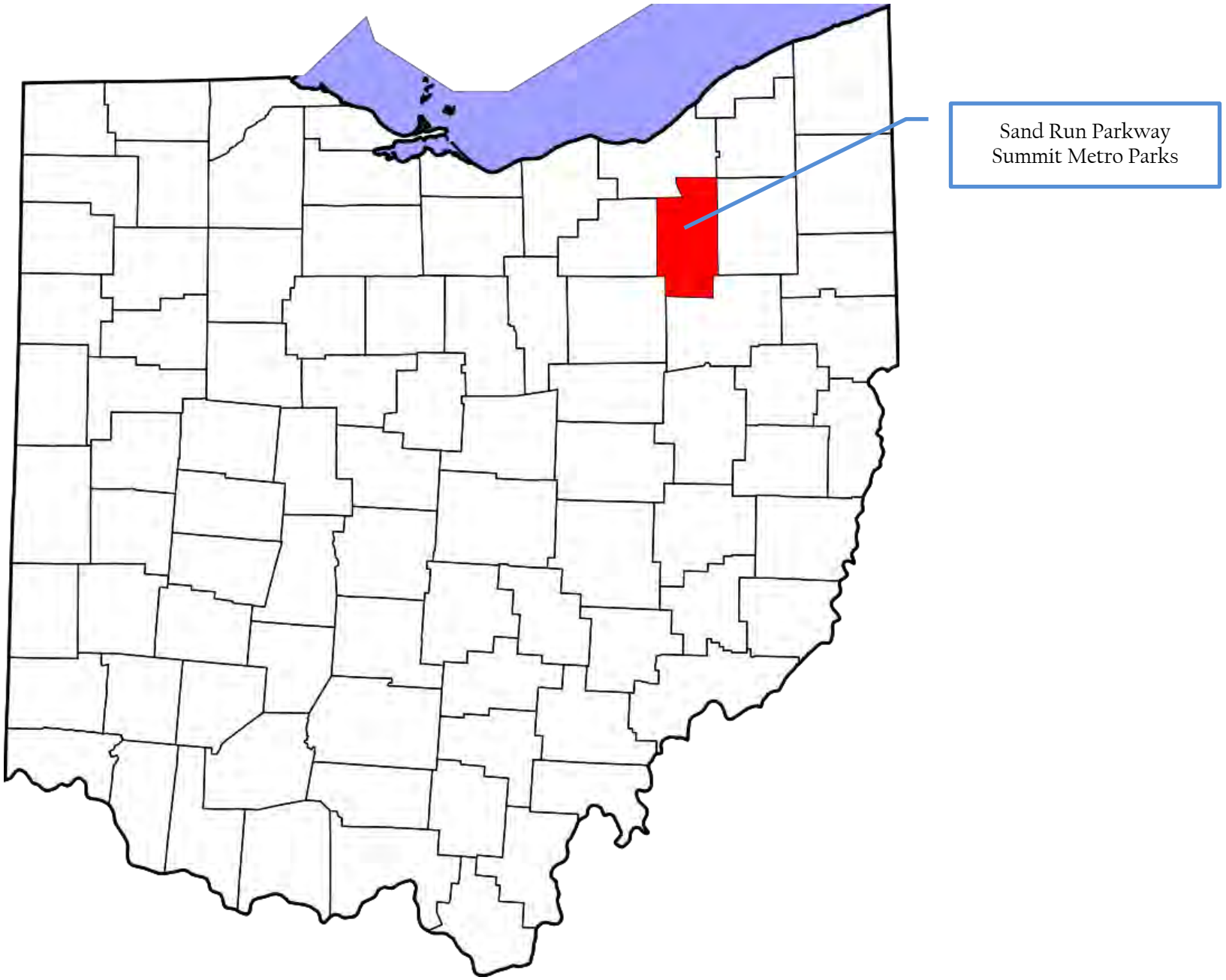
Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

☐ The Hannahville Indian Community has no interest in the area potentially affected by the captioned undertaking.

☐ The Hannahville Indian Community has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Hannahville Indian Community _____ Date _____


Sand Run Parkway
Summit Metro Parks


Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
SAND RUN PARKWAY
SAND RUN ROAD
REVERE ROAD
Sand Run
To Sand Run
Unnamed Tributary
LEGEND
Culvert Improvement
Stabilization Sites
SOURCE
Imagery: OSIP (April 2011)
SAND RUN PARKWAY MITIGATION PLAN
IHOP APPLICATION
PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Rhonda Dixon, Tribal Historic Preservation Officer
Ottawa Tribe of Oklahoma
13 South 69A
Miami, Oklahoma 74354

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Ms. Dixon:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Ottawa Tribe of Oklahoma or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally-assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Ottawa Tribe of Oklahoma to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Ottawa Tribe of Oklahoma or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Ottawa Tribe of Oklahoma.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

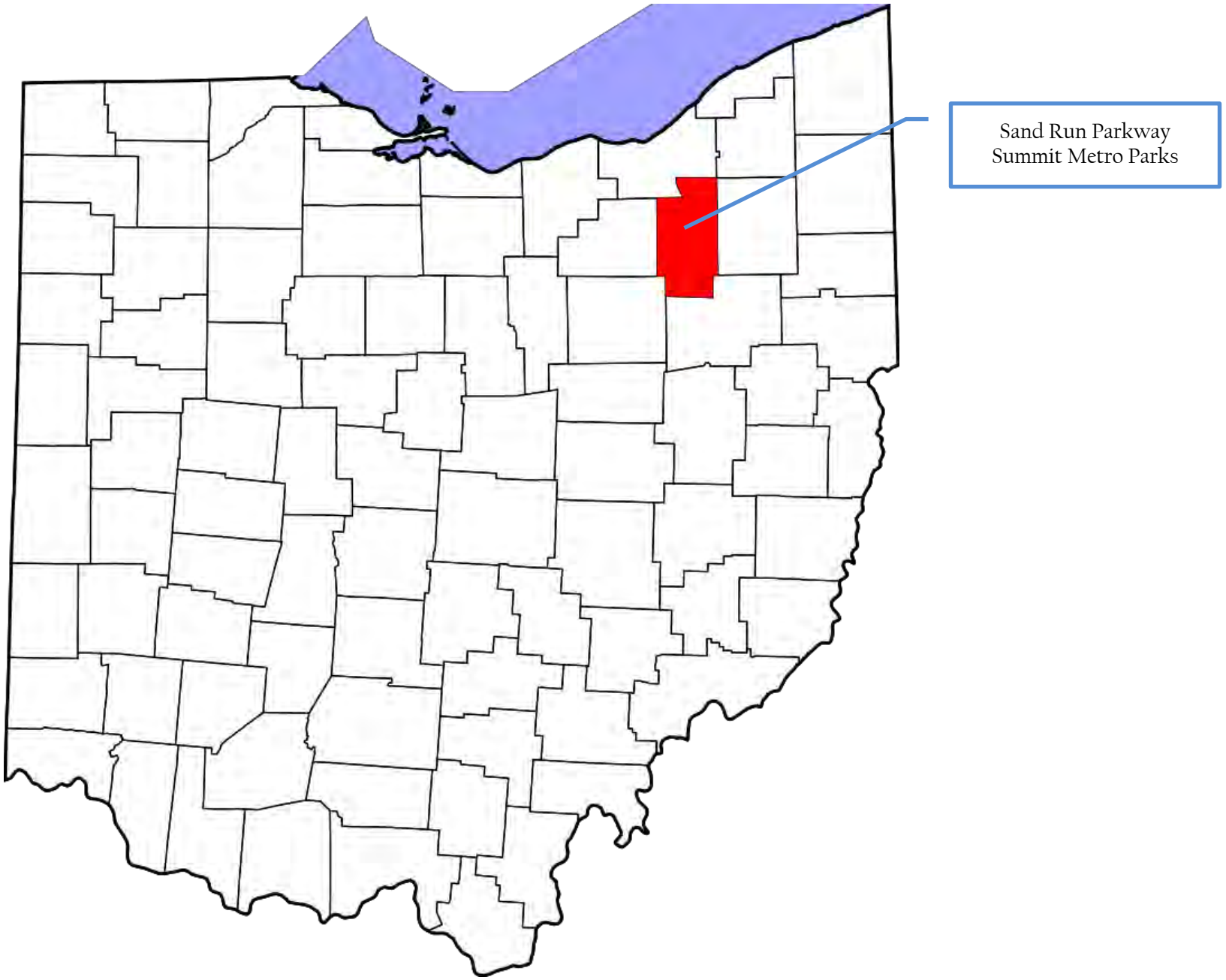
☐ The Ottawa Tribe of Oklahoma has no interest in the area potentially affected by the captioned undertaking.

☐ The Ottawa Tribe of Oklahoma has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Ottawa Tribe of Oklahoma

Date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Summit Metro Parks


Metro Parks Service Center Facility
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IHOP APPLICATION
PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Morris Abrams, Tribal Historic Preservation Officer
Seneca Nation of Indians
90 Ohi:Yoho Way
Salamanca, New York 14779

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Mr. Abrams:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Seneca Nation of Indians or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally-assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Seneca Nation of Indians to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Seneca Nation of Indians or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Seneca Nation of Indians.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

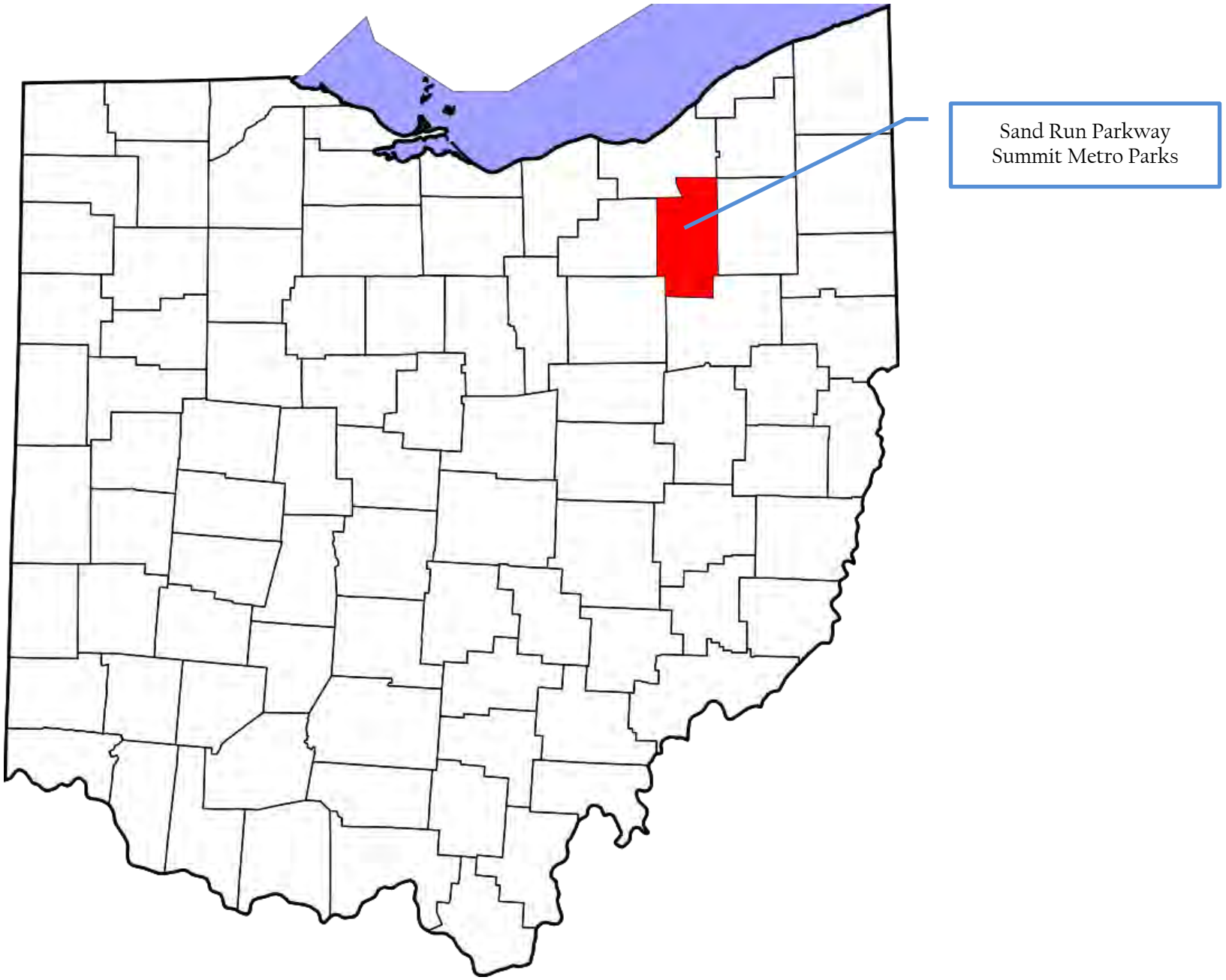
Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

☐ The Seneca Nation of Indians has no interest in the area potentially affected by the captioned undertaking.

☐ The Seneca Nation of Indians has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Seneca Nation of Indians _____ Date _____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PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 4, 2020

Sherri Clemons, Tribal Historic Preservation Officer
Wyandotte Nation
64700 East Highway 60
Wyandotte, Oklahoma 74370

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Ms. Clemons:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally-recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Wyandotte Nation or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally-assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Wyandotte Nation to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to the Wyandotte Nation or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Wyandotte Nation

Receiving notice of your interest to join the consultation regarding this undertaking or notice of Tribes other than those listed above that may have an interest in this undertaking would improve FEMA's efforts to protect resources that may exist in the areas noted on the enclosures. A response form has been provided for your convenience.

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If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

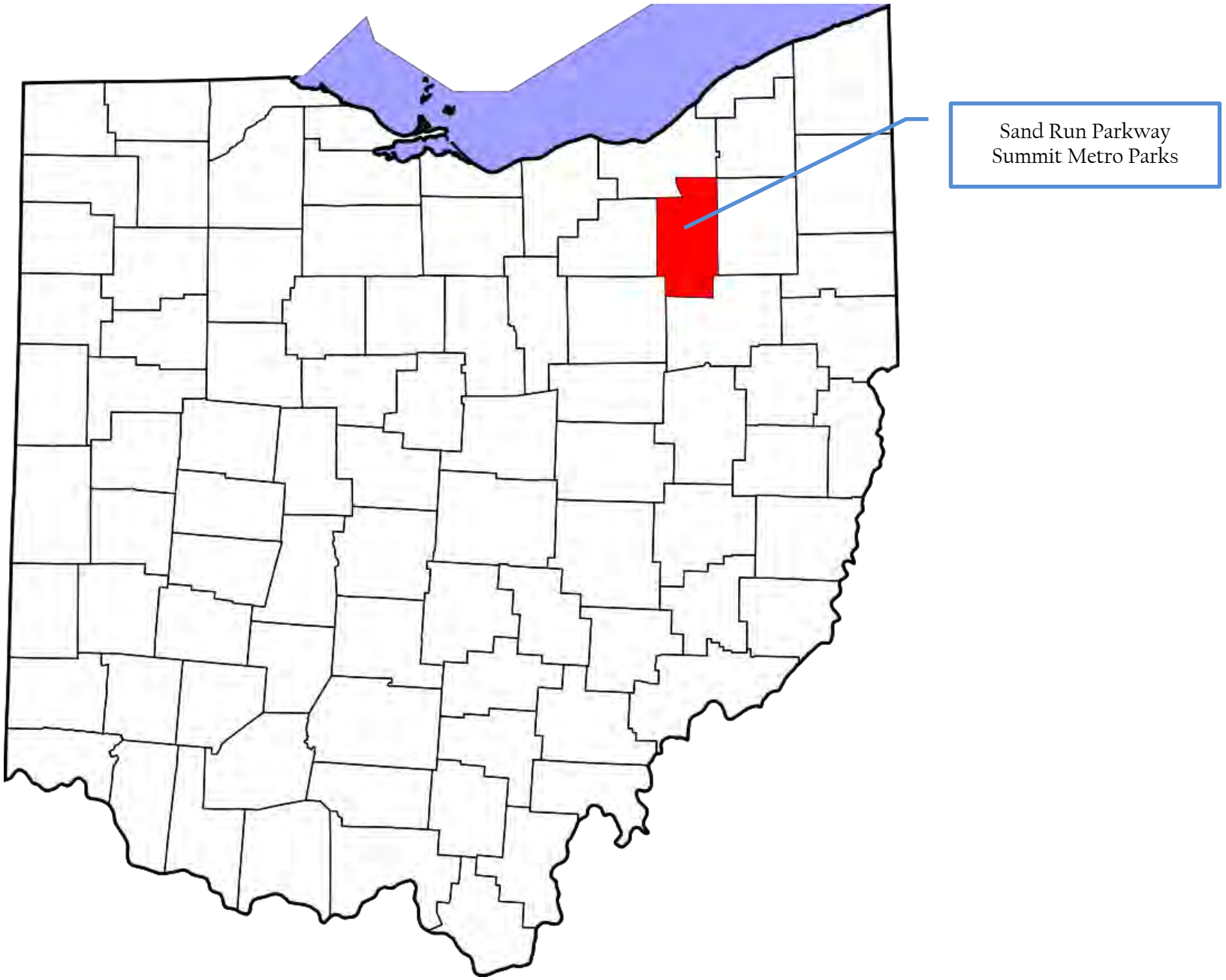
☐ The Wyandotte Nation has no interest in the area potentially affected by the captioned undertaking.

☐ The Wyandotte Nation has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Wyandotte Nation

Date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PROJECT SITE AND STRUCTURES
EMH-T
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From:	Joe Stahlman
To:	Castaldi, Duane
Subject:	RE: New FEMA Project Notification -- Summit County, OH
Date:	Thursday, May 7, 2020 9:55:00 AM
Attachments:	Summit Metro Parks.pdf

Mr. Castaldi,
Here is our reply to the request.

Joe

From: Castaldi, Duane [mailto:Duane.Castaldi@fema.dhs.gov]
Sent: Monday, May 4, 2020 1:04 PM
To: Joe Stahlman <Joe.Stahlman@sni.org>
Subject: New FEMA Project Notification -- Summit County, OH

Good Morning,

Please find a new FEMA project notification.

If you have questions, please do not hesitate to reach out.

Duane D. Castaldi
Regional Environmental Officer
U.S. Department of Homeland Security
FEMA Region V

536 South Clark Street, 6th Floor
Chicago, IL 60605
O: 312-408-5549
E: duane.castaldi@fema.dhs.gov

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

☐ The Seneca Nation of Indians has no interest in the area potentially affected by the captioned undertaking.

☒ The Seneca Nation of Indians has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Seneca Nation of Indians

5/6/20
Date

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

May 29, 2020

Tonya Tipton, Tribal Historic Preservation Officer
Shawnee Tribe
P.O. Box 189
Miami, Oklahoma 74355

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

Dear Ms. Tipton:

The Federal Emergency Management Agency (FEMA) recognizes the special and unique legal relationship that exists between the federal government and federally recognized American Indian Tribes (Tribes). FEMA also recognizes that Tribes may attach religious and cultural significance to historic properties located on aboriginal, ancestral, or ceded lands that are not contiguous with reservation lands. For this reason, FEMA consults with Tribes regarding the possible effects of FEMA-funded undertakings on cultural properties of historic or traditional significance, sometimes referred to as Traditional Cultural Properties (TCPs). The purpose of this communication is to provide information regarding the captioned FEMA-funded project and to invite comment on whether the Shawnee Tribe or other Tribes have interests in the areas potentially affected by this undertaking.

Using Hazard Mitigation Grant funding administered by FEMA, Summit Metro Parks proposes to protect Sand Run Parkway from future flood damage by restoring and stabilizing several sections of stream channel adjacent to the parkway (41.133557, -81.572202). Work includes replacement of an undersized culvert and stabilization of the Sand Run stream bank and that of an unnamed tributary at 11 locations along the parkway. Mitigation actions include channel restoration with rock vanes, slope regrading, a sheet pile wall, and minor realignment to create a naturally meandering channel. The undersized culvert will be replaced with a larger pipe with appropriate capacity for the 100-year flood event, reducing risk of future road washouts. The general project location is noted on the enclosed map.

In accordance with the National Historic Preservation Act and other legislation, FEMA determined that this project constitutes a federally assisted undertaking, requiring review under Section 106 of the National Historic Preservation Act of 1966, as amended. In accord with 36 CFR 800.2(c)(2)(ii), FEMA is providing this opportunity for the Shawnee Tribe to identify concerns about historic properties that may be affected by this undertaking. During project formulation in 2019, the Ohio Emergency Management Agency initiated consultation with SHPO on behalf of FEMA, resulting in the SHPO's conclusion in a letter dated March 14, 2019 that "the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places."

FEMA invites your comments on the potential impacts this proposed undertaking may have on lands traditionally used by or sacred to Shawnee Tribe or other Native American groups. We understand the sensitive nature of much of the information regarding TCPs and assure you in advance that any information you provide will be considered privileged and confidential. In order to safeguard TCPs of interest to Native Americans, we are contacting the following Tribes to request information regarding their interest in this undertaking.

- Delaware Nation
- Delaware Tribe of Indians
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community
- Ottawa Tribe of Oklahoma
- Seneca Nation of Indians
- Shawnee Tribe
- Wyandotte Nation

Receiving notice of your interest in this undertaking or notice of Tribes other than those listed above that may have an interest is welcome. A response form has been provided for your convenience.

Due to workplace restrictions in response to COVID-19, we are using email to provide this request for comment. Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email from your office within thirty (30) days of your receipt of this documentation. For your convenience, we have included a response area below. If FEMA receives no response from your office within thirty (30) days, we will move forward with the project without comment from the Shawnee Tribe.

If you require a paper copy sent by US Mail, we can do so once our offices reopen – just include a request for paper copy in your response and we will place a copy in the mail at that time. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

Sent by email to tonya@shawnee-tribe.com

++++++++*You may fax this page to 312-408-5551, Attn: Duane Castaldi* ++++++++

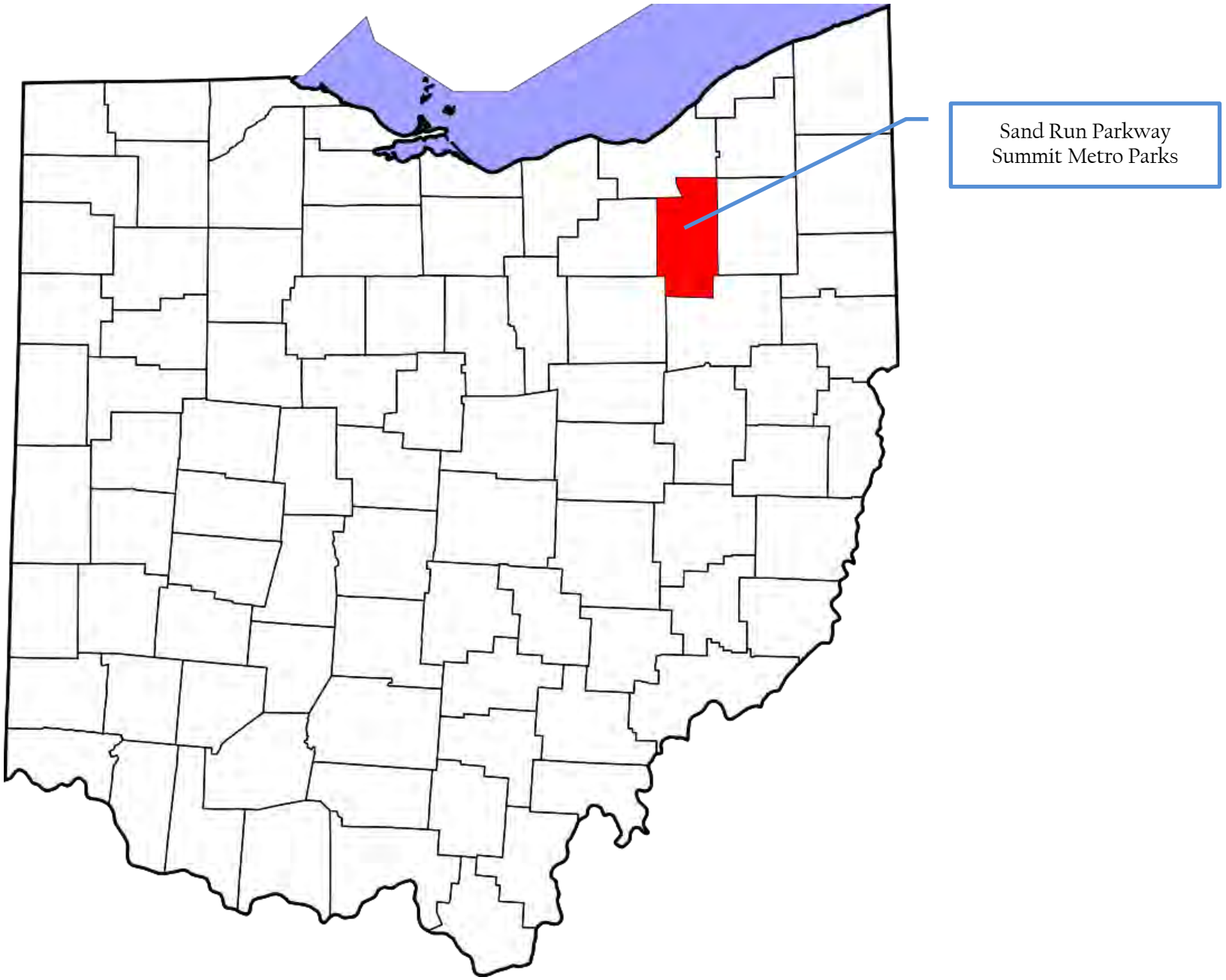
Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County
(4360.13-R)

☐ The Shawnee Tribe has no interest in the area potentially affected by the captioned undertaking.

☐ The Shawnee Tribe has an interest in the area potentially affected by the captioned undertaking. Contact information is provided below.

☐ The Tribal Nations noted below may have an interest in the area potentially affected by this undertaking.

Shawnee Tribe _____ Date _____


Sand Run Parkway
Summit Metro Parks


Metro Parks Service Center Facility
Cuyahoga River
CUYAHOGA VALLEY SCENIC RAILROAD
SAND RUN PARKWAY
SAND RUN ROAD
REVERE ROAD
Unnamed Tributary To Sand Run
Sand Run
LEGEND
Culvert Improvement
Stabilization Sites
SOURCE
Imagery: OSIP (April 2011)
SAND RUN PARKWAY MITIGATION PLAN
IHOP APPLICATION
PROJECT SITE AND STRUCTURES
EMH-T
Document Path: J:\2018\2611\GIS\Grant Application\Project Site.mxd

From: Michael LaRonge
To: Castaldi, Duane
Subject: RE: New FEMA Project Notification -- Summit County, OH
Date: Tuesday, June 2, 2020 9:59:40 PM

Re: FEMA , Sand Run Parkway Protection Project, Summit Metro Parks, Summit County, Ohio.

Dear Mr. Castaldi,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community (FCPC), a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act.

This response is regarding the shoreline protection project listed above. The FCPC Tribal Historic Preservation office would like to review the archaeological survey documentation that back the SHPO finding for the project.

Your interest in protecting cultural and historic properties is appreciated. If you have any questions or concerns, please contact me at the phone number, or email listed below.

Respectfully,

Michael LaRonge
Tribal Historic Preservation Officer
Cultural Preservation Division
Forest County Potawatomi Community
8130 Mish ko Swen Drive
P.O. Box 340
Crandon, Wisconsin 54520
Phone: 715-478-7354
Email: Michael.LaRonge@FCPotawatomi-nsn.gov

From: Castaldi, Duane <Duane.Castaldi@fema.dhs.gov>
Sent: Monday, May 4, 2020 11:47 AM
To: Michael LaRonge <Michael.LaRonge@fcpotawatomi-nsn.gov>
Subject: New FEMA Project Notification -- Summit County, OH

Good Morning,

Please find a new FEMA project notification.

If you have questions, please do not hesitate to reach out.

Duane D. Castaldi

Regional Environmental Officer
U.S. Department of Homeland Security
FEMA Region V

536 South Clark Street, 6th Floor
Chicago, IL 60605
O: 312-408-5549
E: duane.castaldi@fema.dhs.gov

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

Michael LaRonge, Tribal Historic Preservation Officer
Forest County Potawatomi Community of Wisconsin
Natural Resources Department
5320 Wensaut Lane, PO Box 340
Crandon, Wisconsin 54520

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County, Ohio
(FEMA #4360.13-R / SHPO # 2019-SUM-44139)

Dear Mr. LaRonge:

On June 2, 2020, you responded to our correspondence of May 4, 2020, indicating an interest in the captioned Hazard Mitigation Grant Program project funded by the Federal Emergency Management Agency. The purpose of this communication is to continue consultation by sharing new information and repsonding to specific requests made by the consulting parties.

As FEMA works with Summit Metro Parks and the Ohio Emergency Management Agency (EMA) to prepare an Environmental Assessment for this federal undertaking, FEMA determined that a change in the Area of Potential Effects (APE) was necessary to further consultation under Section 106 of the National Historic Preservation Act (NHPA). To that end, FEMA has provided SHPO the attached addendum to consultation originally conducted by Ohio EMA. You will find that the attached documentation presents the revised APE for this undertaking and reports FEMA's finding of no adverse effects on historic properties. In addition, we have included the SHPO's original letter noting that the scope submitted in February of this year would have no effects on properties listed in or eligible for listing in the National Register. We have also enclosed an abstract of an archaeological survey report regarding the area surveyed that lies partially within the APE for this undertaking.

We are interested receiving any comments or questions you have regarding these materials. Please note that within a week or so you will also be receiving a scoping document FEMA is preparing. That document will provide a more detailed scope of work and additional information regarding potential impacts to natural and cultural resources expected to result from this undertaking.

We look forward to a response by email from your office within thirty (30) days of your receipt of this documentation. Thank you for your assistance in helping FEMA meet its responsibilities to comply with Section 106 of the NHPA and related executive orders. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

Sent by email to Michael.LaRonge@FCPotawatomi-nsn.gov

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

Diana Welling
Deputy State Historic Preservation Officer
Ohio Historic Preservation Office
800 East 17th Avenue
Columbus, Ohio 43211

Re: Summit Metro Parks, Sand Run Parkway Protection, Akron, Summit County
Addendum for Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139

Dear Ms. Welling:

Pursuant to the Section 106 of the National Historic Preservation Act, I am writing this letter to reopen and conclude consultation regarding the captioned Hazard Mitigation Grant Program project.

On March 14, 2020, your office notified the Ohio Emergency Management Agency that the proposed undertaking would not affect properties listed in or eligible for listing in the National Register of Historic Places. Since then, the recipient has added scope to the project, necessitating the expansion of the area of potential effects. In accordance with 36 CFR §800.11, I am enclosing documentation regarding the added scope of this undertaking and its effect on historic properties. The documentation provides the justification for FEMA's finding of no adverse effects on historic properties; the purpose of this communication is to seek concurrence in that finding.

Due to workplace restrictions in response to COVID-19, we are using email to deliver this Section 106 consultation. We understand the impacts COVID-19 has had on your operations and will provide a paper copy of this consultation through US Mail when our office reopens, including notice that the documentation follows an electronic submission, per your instructions.

Because our reliance on digital communications must continue until our offices reopen, we would appreciate a response by email. For your convenience, we have included a response area below. Pursuant to 36 CFR 800.5(c)(1), if we receive no response from your office within thirty (30) days, we will consider the lack of response agreement with FEMA's finding and will move forward with this undertaking. If you have questions, do not hesitate to contact me at duane.castaldi@fema.dhs.gov or 312-408-5549

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may email this page to duane.castaldi@fema.dhs.gov* ++++++++

Re: Summit Metro Parks, Sand Run Parkway Protection, Akron, Summit County
Addendum for Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139

☐ Under the authority of the National Historic Preservation Act of 1966, as amended, the Ohio State Historic Preservation Office ***concurs*** with FEMA's finding that the captioned undertaking will result in ***no adverse effect on historic properties***.

☐ Under the authority of the National Historic Preservation Act of 1966, as amended, the Ohio State Historic Preservation Office ***objects*** to FEMA's finding that the captioned undertaking will result in ***no adverse effect on historic properties*** for the reasons provided below:

Ohio State Historic Preservation Office

Date

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

—Addendum—
Summit Metro Parks, Sand Run Parkway Protection
Akron, Summit County
Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139
41.133748, -81.572017

Description of Undertaking and APE:

In response to documentation meeting the requirements of 36 CFR §800.11, SHPO notified the Ohio Emergency Management Agency (EMA) that the captioned undertaking would not affect properties listed in or eligible for listing in the National Register of Historic Places. Since then, Ohio EMA informed FEMA that the project would include work on additional resources. Specifically, the project now includes the following:

- Thirteen streambank stabilization sites;
- Nine culver repairs, replacements, or upgrades with associated site work; and
- Development of an aquatic organism passage (AOP) improvement just east of the Valley Railway bridge located just east of the park Service Center and Volunteer Offices

Among work now in scope are a streambank stabilization segment immediately west of the Cuyahoga Scenic Valley Railroad bridge, north of the park's Service Center and the AOP improvement. The latter of these will address an abrupt stream grade elevation change located immediately downstream of the Service Center. An existing five-foot channel drop from the edge of the railroad bridge down to the bottom of a scour pool will be replaced by a custom fish passage that will function similar to a fish ladder, with large stones carefully placed to create a gradually stepped incline, to facilitate movement of aquatic organisms. Work will be done in the existing stream channel, up to the existing railway bridge, with staging from the nearby paved drive and parking lot. No work will be done on the historic bridge itself.

The AOP improvement and nearby stream stabilization require the expansion of the APE to include a portion of the Valley Railway Historic District. The revised APE, like the original, includes Sand Run Parkway, its right-of-way, sections of the nearby Mingo Trail, and portions of the adjacent Sand Run stream and unnamed tributaries as required to complete the work. The previously identified APE and the expanded APE are noted on the attached aerials.

Steps Taken to Identify Historic Properties:

Archaeology

The expanded APE includes an additional section of an area surveyed in 2008, parts of which were also within the previously submitted APE. No further archaeological research was recommended "unless future development has the potential for impacts" to sites located on a ridge to the north of and outside the APE for this undertaking.[1] The survey authors then suggest that conducting further investigation "of the graded, grassy area in front of the Mingo Pavilion on the ridge top" near 33-SU-482 could answer the question of the location of the historic Cuyahoga Old Town and may further reveal more about the prehistoric component of the site. Aerials included in this submission show that this area is outside the revised APE for this undertaking. See the previous submission for analysis of areas impacted by the streambank stabilization and culvert activities within the previously reported APE and SHPO's assessment that no historic properties would be affected by that work.

Structures

The expanded APE now includes a small section of the Valley Railway Historic District, which is located along the Cuyahoga Valley between Rockside Road at Cuyahoga National Recreation Area and Howard Street at Little Cuyahoga Valley in Akron, Summit County, Ohio (NPS # 85001123). The significance of the Valley Railway is noted in its National Register Nomination as follows:

> *The line is unique because is follows the proven route of an earlier transportation system, the canal, and it retains the character of a nineteenth century railway line to an unusual degree. Unlike other railroads, the line was never double-tracked for expanded traffic, and the right-of-way remained virtually unaltered. While the rights-of-way of the other railroads mentioned above remain in existence and many of them in operation as parts of the Amtrak and Conrail systems, the Valley Railway possesses a unique integrity of location, setting, feeling and association.*

These characteristics of the section of the district within the APE for this undertaking appear not to have changed since the listing of the district in 1985.

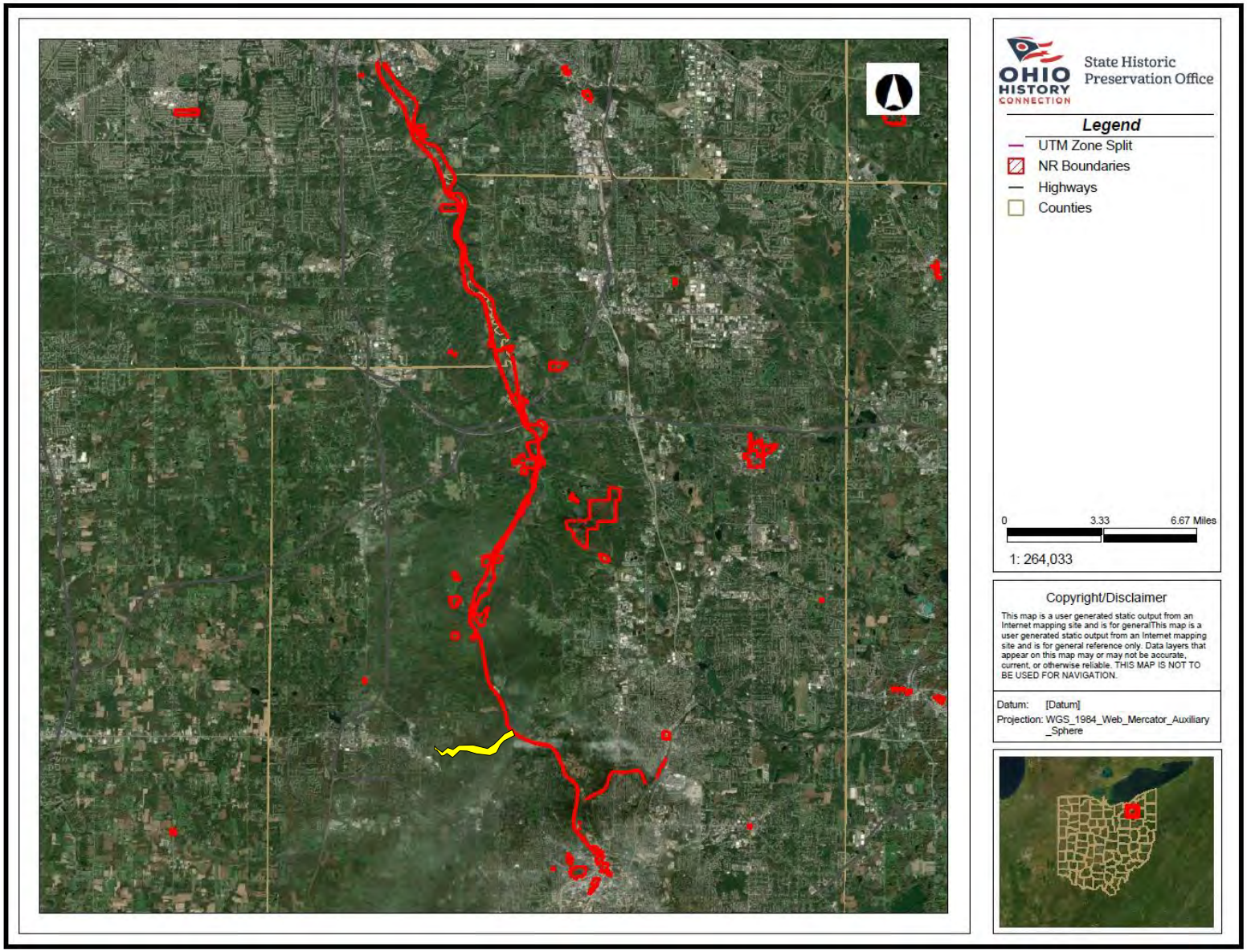
Determination of Eligibility:

FEMA reaffirms that the Valley Railroad Historic District continues to be ***eligible for listing on the National Register of Historic Places*** under Criterion A for Transportation.

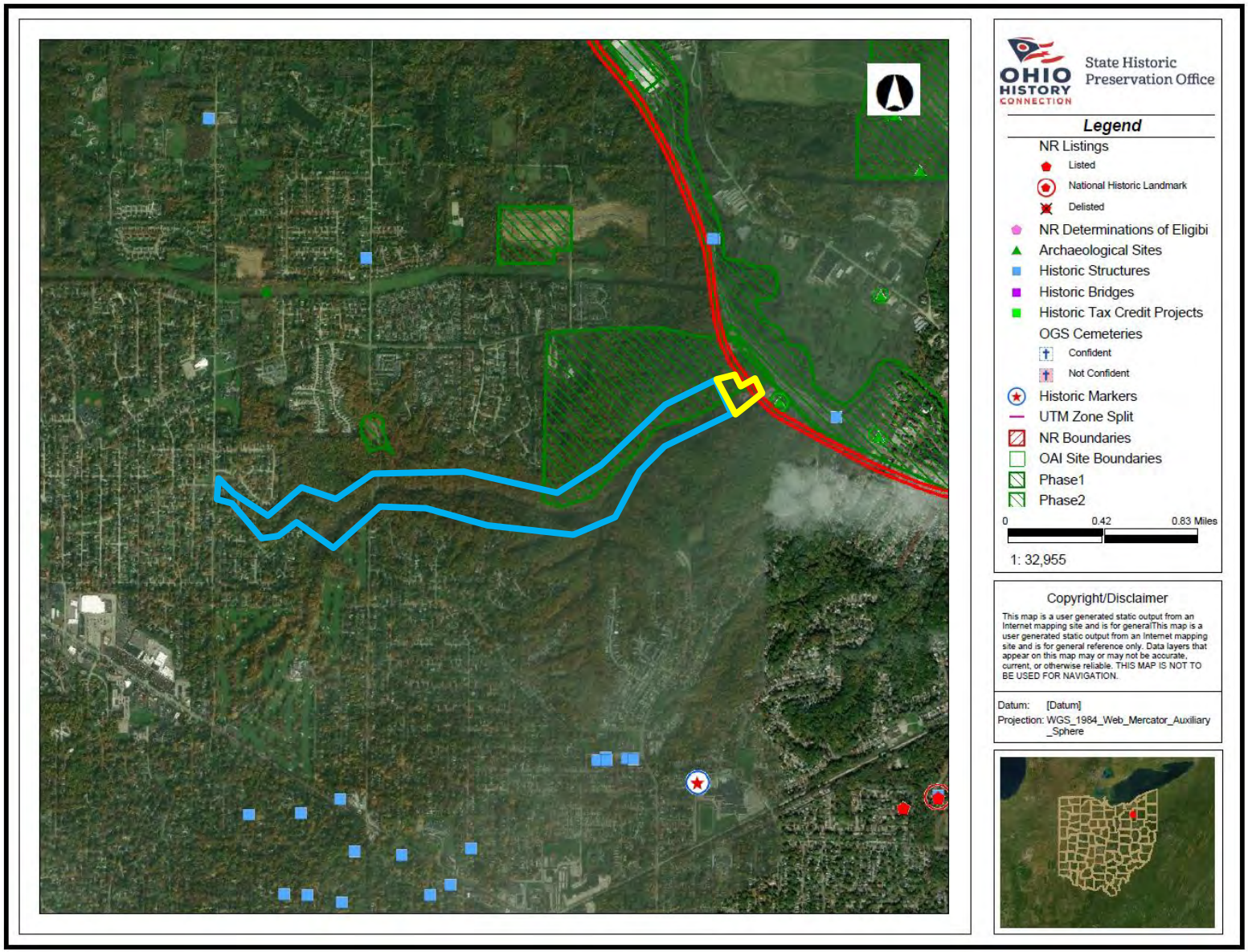
[1] Linda Whitman *et al.*, *Report of the Historic and Archaeological Investigations at Nature Realm and a portion of Sand Run Metro Park, City of Akron, Summit County, Ohio* (November 2008), OHI #SU-17412, page ii.

Undertaking's Effects on Historic Properties:	Only a small segment of this 24.5-mile linear district will be affected by this undertaking, namely the area directly adjacent to the work to be done within the stream. No physical work will be done on the railway itself. Equipment will be staged from Sand Run Parkway east of the railway. Work will be done in the stream channel up to the existing railway bridge. No work will be done on the historic bridge itself. The project proposes replacing a five-foot drop from the edge of the bridge to a stilling pool with a gradual change in grade of the stream bed by installing boulders and other materials to allow for passage of aquatic animals. Because of the position of the stream channel, changes to the views of Sand Run are not likely to be visible from any public way, except from the railway bridge. However, the view of Sand Run from the bridge is not a character-defining feature of the historic district and will therefore not affect the characteristics related to the district's significance, which have been defined as the railway's route, track configuration, and historic right-of-way.
Finding:	FEMA finds that this undertaking, including the proposed the added scope items described here, will result in ***no adverse effects on historic properties***.

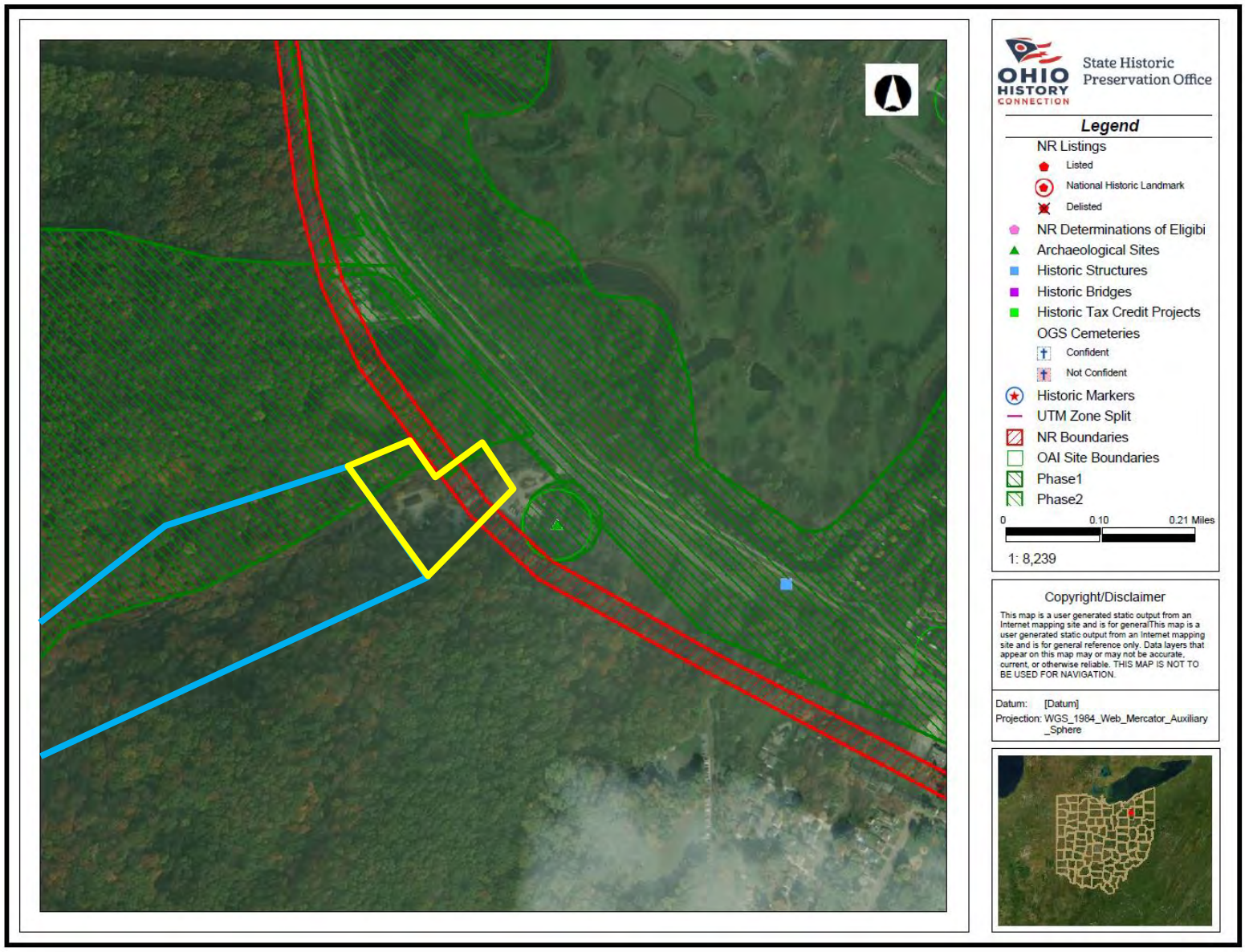
Boundary of the 24.5-mile Valley Railway Historic District noted in red with approximate APE in yellow (*Ohio Historic Inventory*)



Original approximate APE noted in blue; proposed APE extension noted in yellow (*Ohio Historic Inventory*)

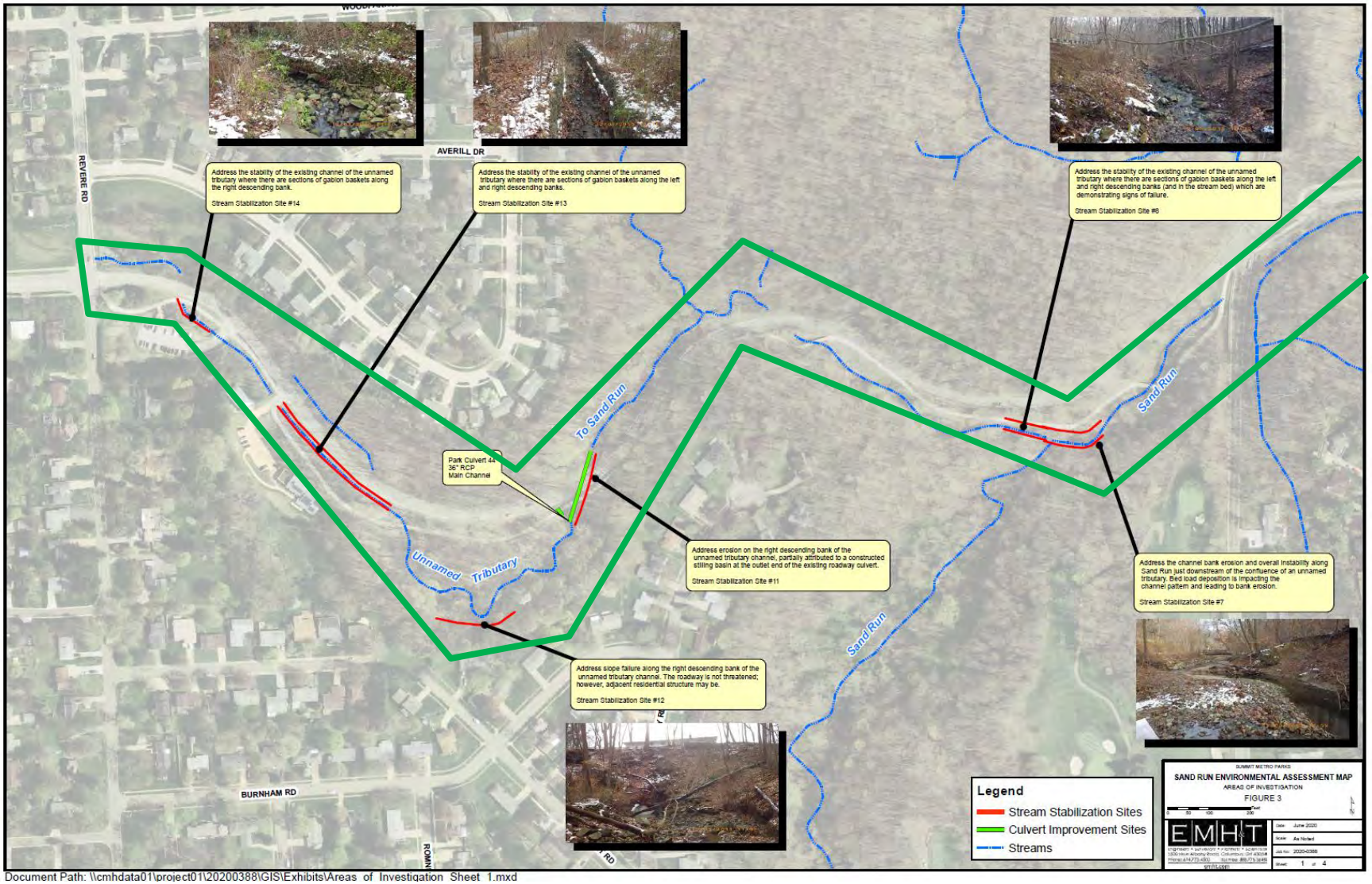


Original APE noted in blue; proposed APE extension noted in yellow (*Ohio Historic Inventory*)

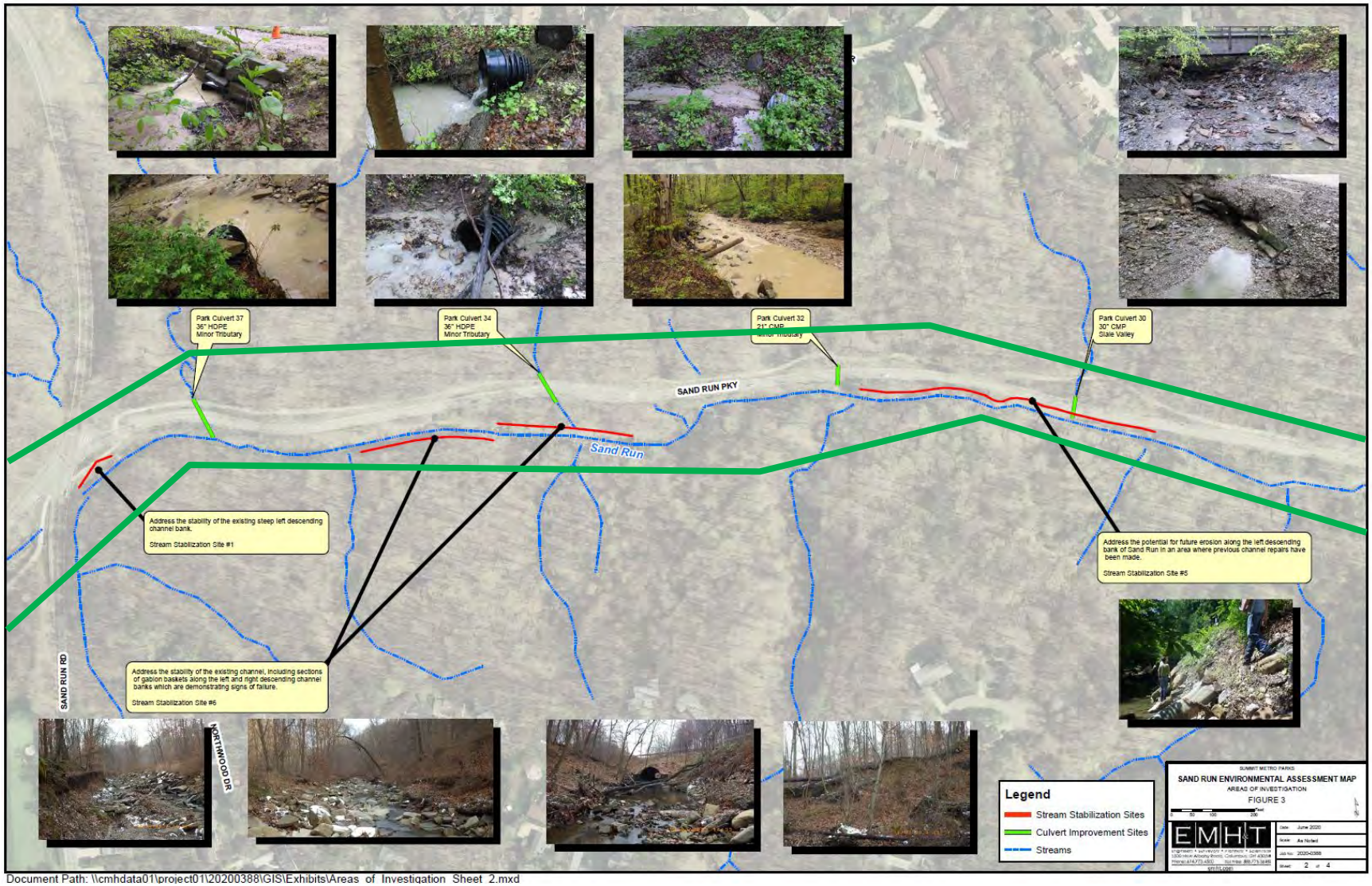


Revised APE noted in green; "grassy area in front of the Mingo Pavilion" noted in yellow (*GoogleEarth*)

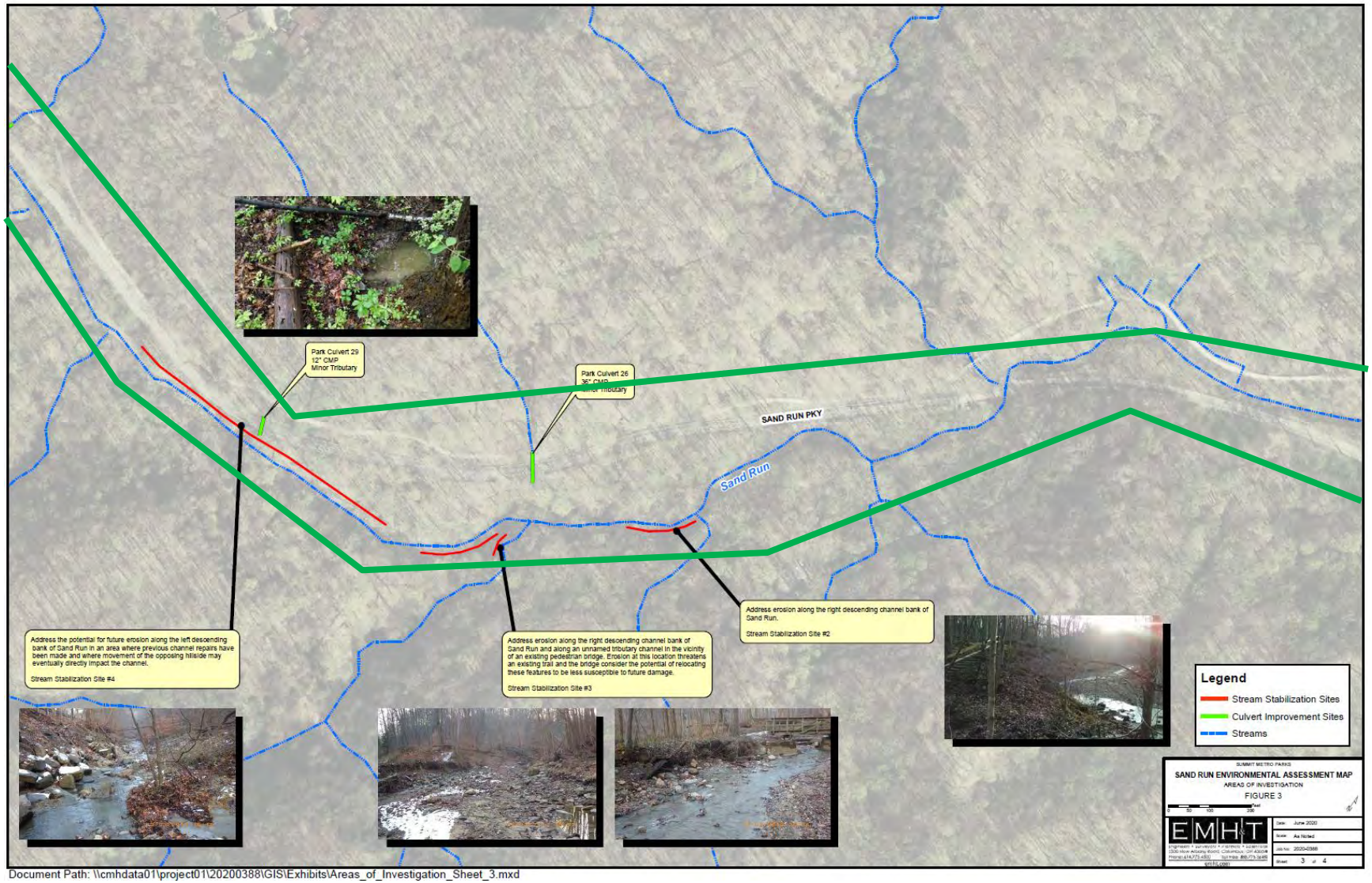
Proposed APE boundaries noted in green



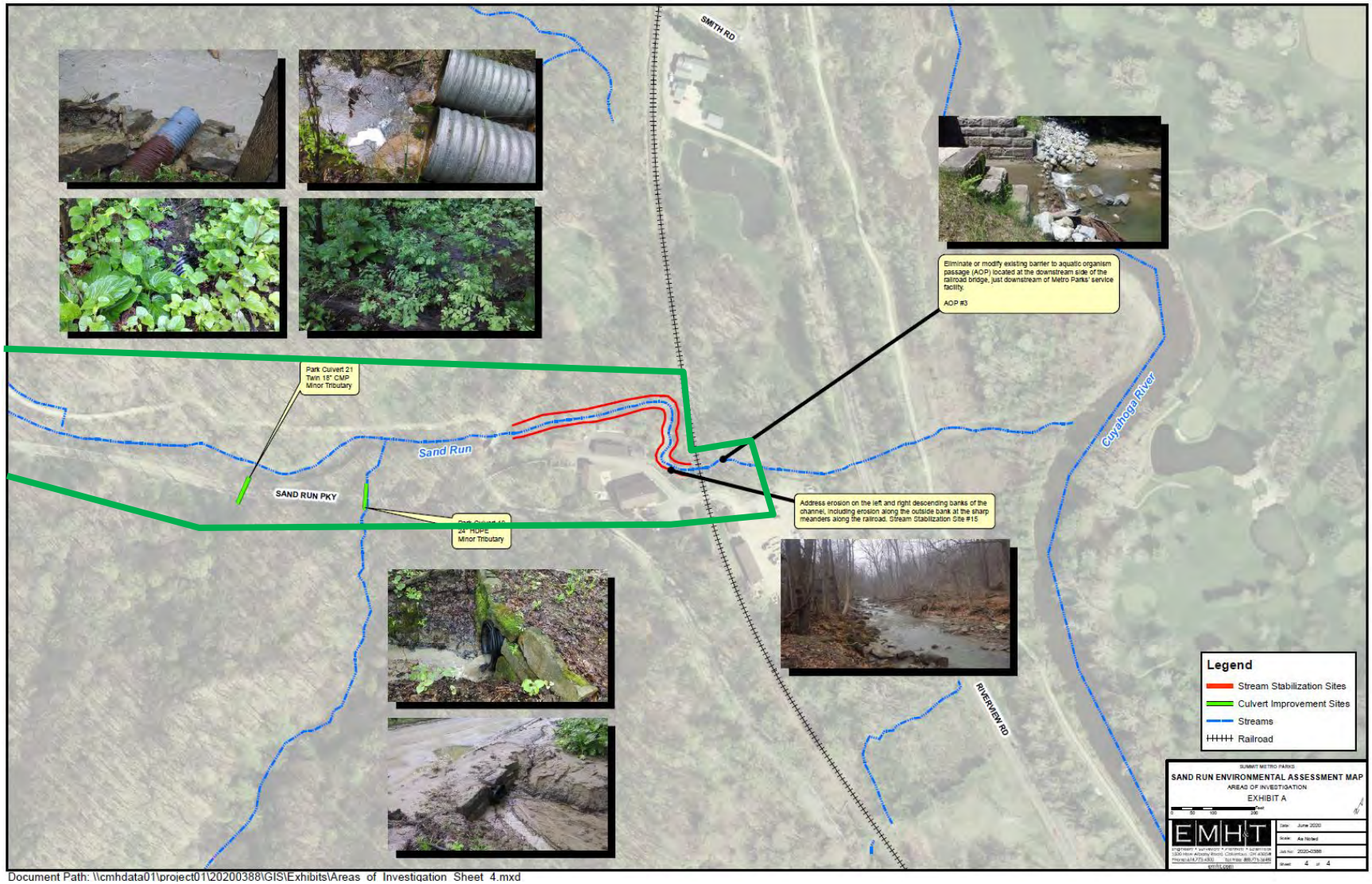
Proposed APE boundaries noted in green



Proposed APE boundaries noted in green



Proposed APE boundaries noted in green



OHIO HISTORY CONNECTION

In reply refer to
2019-SUM-44139

March 14, 2019

Dan Clevidence
Ohio EMA
2855 W. Dublin Road
Columbus, Ohio 43235

Dear Mr. Clevidence:

Re: Summit Metro Parks, Sand Run Parkway Protection, 975 Treaty Line Road, Akron, Summit County, Ohio

This is in response to your correspondence, received on February 25, 2019, regarding this project. The undertaking is defined as eleven locations of erosion control along Sand Run parkway in Akron, Summit County, Ohio. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information submitted, it is my opinion that the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2000, or by email at nyoung@ohiohistory.org.

Sincerely,

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

Report of the Historic and Archaeological Investigations at Nature Realm and a portion of Sand Run Metro Park, City of Akron, Summit County, Ohio

By

Linda G. Whitman, MS, RPA
Lynn R. Metzger, PhD
Ann E. Donkin, BS
Michelle Davis, BA

Submitted to:

David Whited
Metro Parks Serving Summit County
975 Treaty Line Road
Akron, Ohio 43313-5898

Submitted by:

Community Archaeology Program
Department of Classical Studies, Anthropology and Archaeology
University of Akron
Olin Hall, Room 237
Akron, Ohio 44325-1910

NOVEMBER 2008

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

Joe Stahlman, Tribal Historic Preservation Officer
Seneca Nation of Indians
82 W. Hetzel St.
Salamanca, New York 14779

Re: Sand Run Parkway Protection Project, Summit Metro Parks, Summit County, Ohio
(FEMA #4360.13-R / SHPO # 2019-SUM-44139)

Dear Dr. Stahlman:

On May 7, 2020, you responded to our correspondence of May 4, 2020, indicating an interest in the captioned Hazard Mitigation Grant Program project funded by the Federal Emergency Management Agency. The purpose of this communication is to continue consultation by sharing new information and repsonding to specific requests made by the consulting parties.

As FEMA works with Summit Metro Parks and the Ohio Emergency Management Agency (EMA) to prepare an Environmental Assessment for this federal undertaking, FEMA determined that a change in the Area of Potential Effects (APE) was necessary to further consultation under Section 106 of the National Historic Preservation Act (NHPA). To that end, FEMA has provided SHPO the attached addendum to consultation originally conducted by Ohio EMA. You will find that the attached documentation presents the revised APE for this undertaking and reports FEMA's finding of no adverse effects on historic properties. In addition, we have included the SHPO's original letter noting that the scope submitted in February of this year would have no effects on properties listed in or eligible for listing in the National Register. We have also enclosed an abstract of an archaeological survey report regarding the area surveyed that lies partially within the APE for this undertaking.

We are interested receiving any comments or questions you have regarding these materials. Please note that within a week or so you will also be receiving a scoping document FEMA is preparing. That document will provide a more detailed scope of work and additional information regarding potential impacts to natural and cultural resources expected to result from this undertaking.

We look forward to a response by email from your office within thirty (30) days of your receipt of this documentation. Thank you for your assistance in helping FEMA meet its responsibilities to comply with Section 106 of the NHPA and related executive orders. If you have any questions or comments, please do not hesitate to contact me at 312-408-5549 or at duane.castaldi@fema.dhs.gov.

Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

Sent by email to joe.stahlman@sni.or

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

Diana Welling
Deputy State Historic Preservation Officer
Ohio Historic Preservation Office
800 East 17th Avenue
Columbus, Ohio 43211

Re: Summit Metro Parks, Sand Run Parkway Protection, Akron, Summit County
Addendum for Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139

Dear Ms. Welling:

Pursuant to the Section 106 of the National Historic Preservation Act, I am writing this letter to reopen and conclude consultation regarding the captioned Hazard Mitigation Grant Program project.

On March 14, 2020, your office notified the Ohio Emergency Management Agency that the proposed undertaking would not affect properties listed in or eligible for listing in the National Register of Historic Places. Since then, the recipient has added scope to the project, necessitating the expansion of the area of potential effects. In accordance with 36 CFR §800.11, I am enclosing documentation regarding the added scope of this undertaking and its effect on historic properties. The documentation provides the justification for FEMA's finding of no adverse effects on historic properties; the purpose of this communication is to seek concurrence in that finding.

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Sincerely,

Duane Castaldi
Regional Environmental Officer
FEMA Region V

Enclosures

++++++++*You may email this page to duane.castaldi@fema.dhs.gov* ++++++++

Re: Summit Metro Parks, Sand Run Parkway Protection, Akron, Summit County
Addendum for Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139

☐ Under the authority of the National Historic Preservation Act of 1966, as amended, the Ohio State Historic Preservation Office ***concurs*** with FEMA's finding that the captioned undertaking will result in ***no adverse effect on historic properties***.

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Ohio State Historic Preservation Office

Date

U.S. Department of Homeland Security
536 South Clark Street, 6th Floor
Chicago, Illinois 60605-1521

FEMA

June 10, 2020

—Addendum—
Summit Metro Parks, Sand Run Parkway Protection
Akron, Summit County
Revised Scope
FEMA # 4360.13-R / SHPO # 2019-SUM-44139
41.133748, -81.572017

Description of Undertaking and APE:

In response to documentation meeting the requirements of 36 CFR §800.11, SHPO notified the Ohio Emergency Management Agency (EMA) that the captioned undertaking would not affect properties listed in or eligible for listing in the National Register of Historic Places. Since then, Ohio EMA informed FEMA that the project would include work on additional resources. Specifically, the project now includes the following:

- Thirteen streambank stabilization sites;
- Nine culver repairs, replacements, or upgrades with associated site work; and
- Development of an aquatic organism passage (AOP) improvement just east of the Valley Railway bridge located just east of the park Service Center and Volunteer Offices

Among work now in scope are a streambank stabilization segment immediately west of the Cuyahoga Scenic Valley Railroad bridge, north of the park's Service Center and the AOP improvement. The latter of these will address an abrupt stream grade elevation change located immediately downstream of the Service Center. An existing five-foot channel drop from the edge of the railroad bridge down to the bottom of a scour pool will be replaced by a custom fish passage that will function similar to a fish ladder, with large stones carefully placed to create a gradually stepped incline, to facilitate movement of aquatic organisms. Work will be done in the existing stream channel, up to the existing railway bridge, with staging from the nearby paved drive and parking lot. No work will be done on the historic bridge itself.

The AOP improvement and nearby stream stabilization require the expansion of the APE to include a portion of the Valley Railway Historic District. The revised APE, like the original, includes Sand Run Parkway, its right-of-way, sections of the nearby Mingo Trail, and portions of the adjacent Sand Run stream and unnamed tributaries as required to complete the work. The previously identified APE and the expanded APE are noted on the attached aerials.

Steps Taken to Identify Historic Properties:

Archaeology

The expanded APE includes an additional section of an area surveyed in 2008, parts of which were also within the previously submitted APE. No further archaeological research was recommended "unless future development has the potential for impacts" to sites located on a ridge to the north of and outside the APE for this undertaking.[1] The survey authors then suggest that conducting further investigation "of the graded, grassy area in front of the Mingo Pavilion on the ridge top" near 33-SU-482 could answer the question of the location of the historic Cuyahoga Old Town and may further reveal more about the prehistoric component of the site. Aerials included in this submission show that this area is outside the revised APE for this undertaking. See the previous submission for analysis of areas impacted by the streambank stabilization and culvert activities within the previously reported APE and SHPO's assessment that no historic properties would be affected by that work.

Structures

The expanded APE now includes a small section of the Valley Railway Historic District, which is located along the Cuyahoga Valley between Rockside Road at Cuyahoga National Recreation Area and Howard Street at Little Cuyahoga Valley in Akron, Summit County, Ohio (NPS # 85001123). The significance of the Valley Railway is noted in its National Register Nomination as follows:

> *The line is unique because is follows the proven route of an earlier transportation system, the canal, and it retains the character of a nineteenth century railway line to an unusual degree. Unlike other railroads, the line was never double-tracked for expanded traffic, and the right-of-way remained virtually unaltered. While the rights-of-way of the other railroads mentioned above remain in existence and many of them in operation as parts of the Amtrak and Conrail systems, the Valley Railway possesses a unique integrity of location, setting, feeling and association.*

These characteristics of the section of the district within the APE for this undertaking appear not to have changed since the listing of the district in 1985.

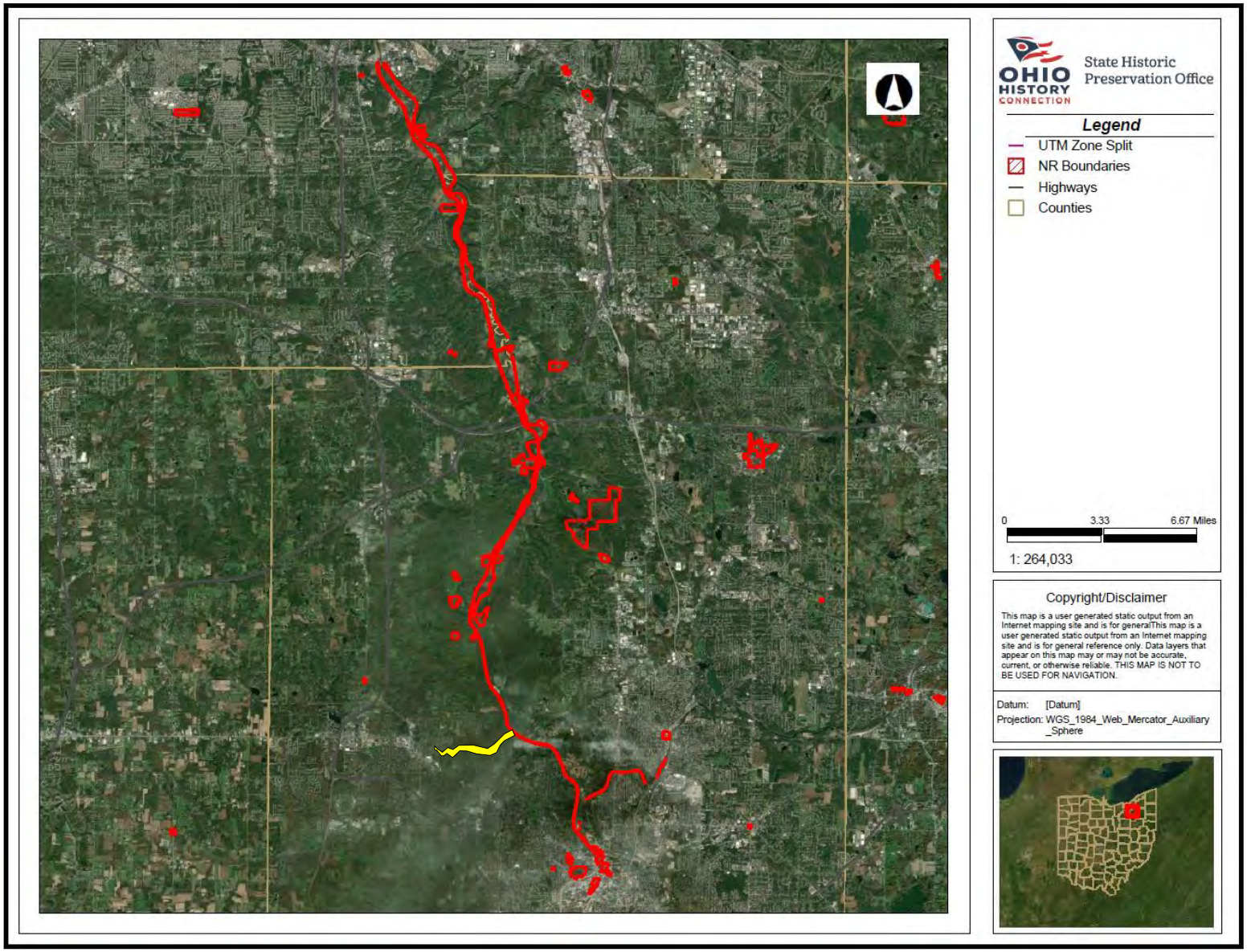
Determination of Eligibility:

FEMA reaffirms that the Valley Railroad Historic District continues to be ***eligible for listing on the National Register of Historic Places*** under Criterion A for Transportation.

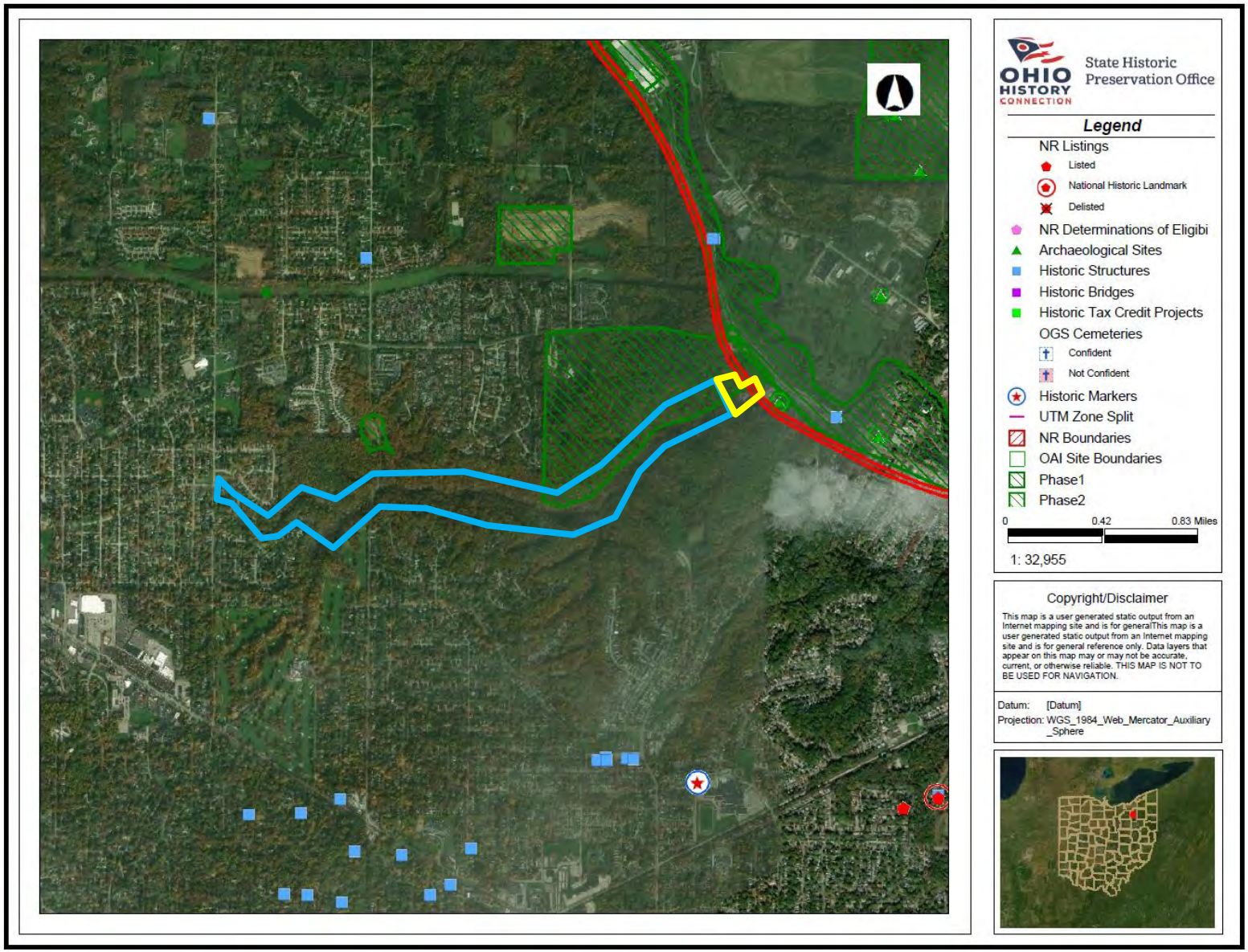
[1] Linda Whitman *et al.*, *Report of the Historic and Archaeological Investigations at Nature Realm and a portion of Sand Run Metro Park, City of Akron, Summit County, Ohio* (November 2008), OHI #SU-17412, page ii.

Undertaking's Effects on Historic Properties:	Only a small segment of this 24.5-mile linear district will be affected by this undertaking, namely the area directly adjacent to the work to be done within the stream. No physical work will be done on the railway itself. Equipment will be staged from Sand Run Parkway east of the railway. Work will be done in the stream channel up to the existing railway bridge. No work will be done on the historic bridge itself. The project proposes replacing a five-foot drop from the edge of the bridge to a stilling pool with a gradual change in grade of the stream bed by installing boulders and other materials to allow for passage of aquatic animals. Because of the position of the stream channel, changes to the views of Sand Run are not likely to be visible from any public way, except from the railway bridge. However, the view of Sand Run from the bridge is not a character-defining feature of the historic district and will therefore not affect the characteristics related to the district's significance, which have been defined as the railway's route, track configuration, and historic right-of-way.
Finding:	FEMA finds that this undertaking, including the proposed the added scope items described here, will result in ***no adverse effects on historic properties***.

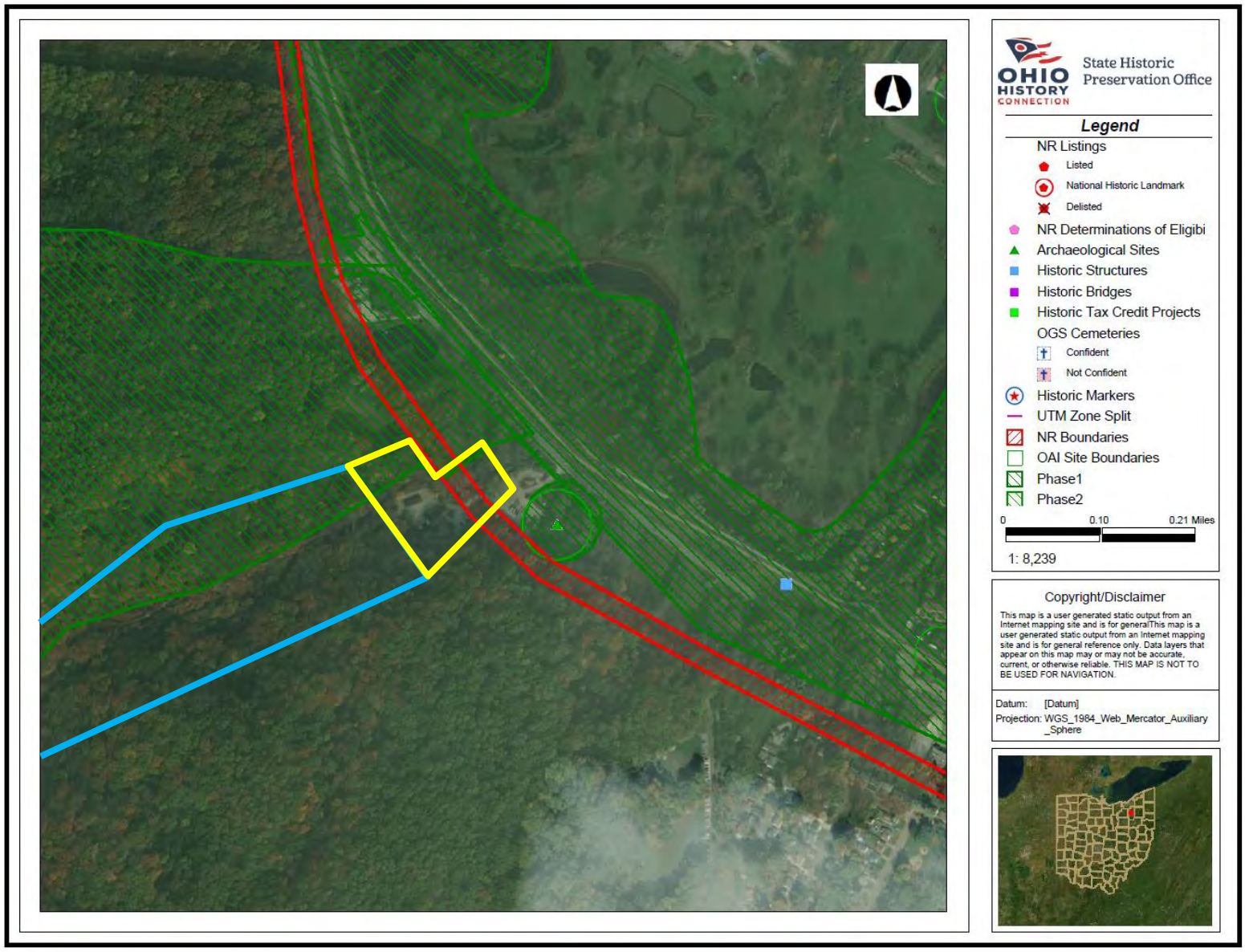
Boundary of the 24.5-mile Valley Railway Historic District noted in red with approximate APE in yellow (*Ohio Historic Inventory*)



Original approximate APE noted in blue; proposed APE extension noted in yellow (*Ohio Historic Inventory*)

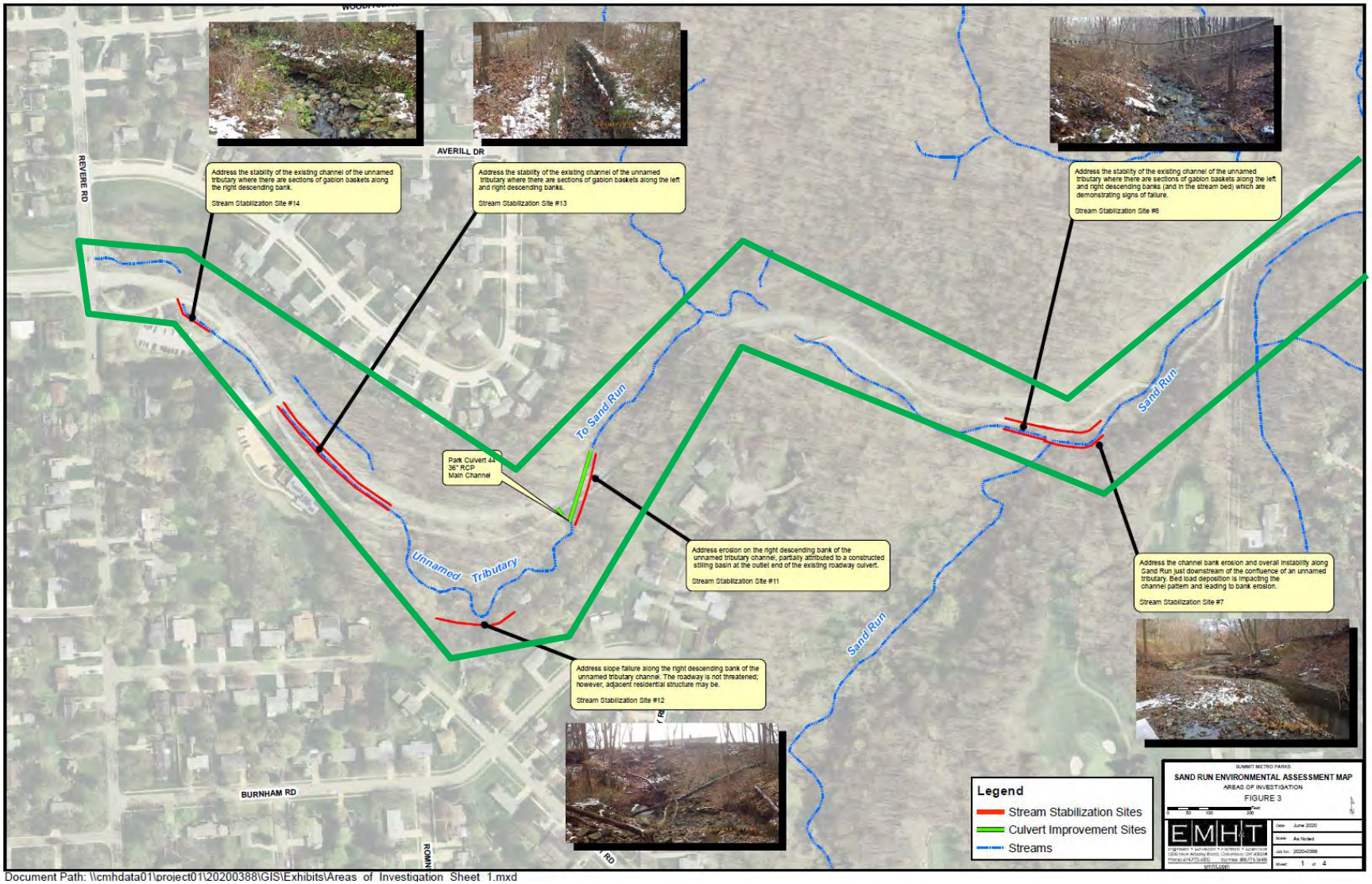


Original APE noted in blue; proposed APE extension noted in yellow (*Ohio Historic Inventory*)

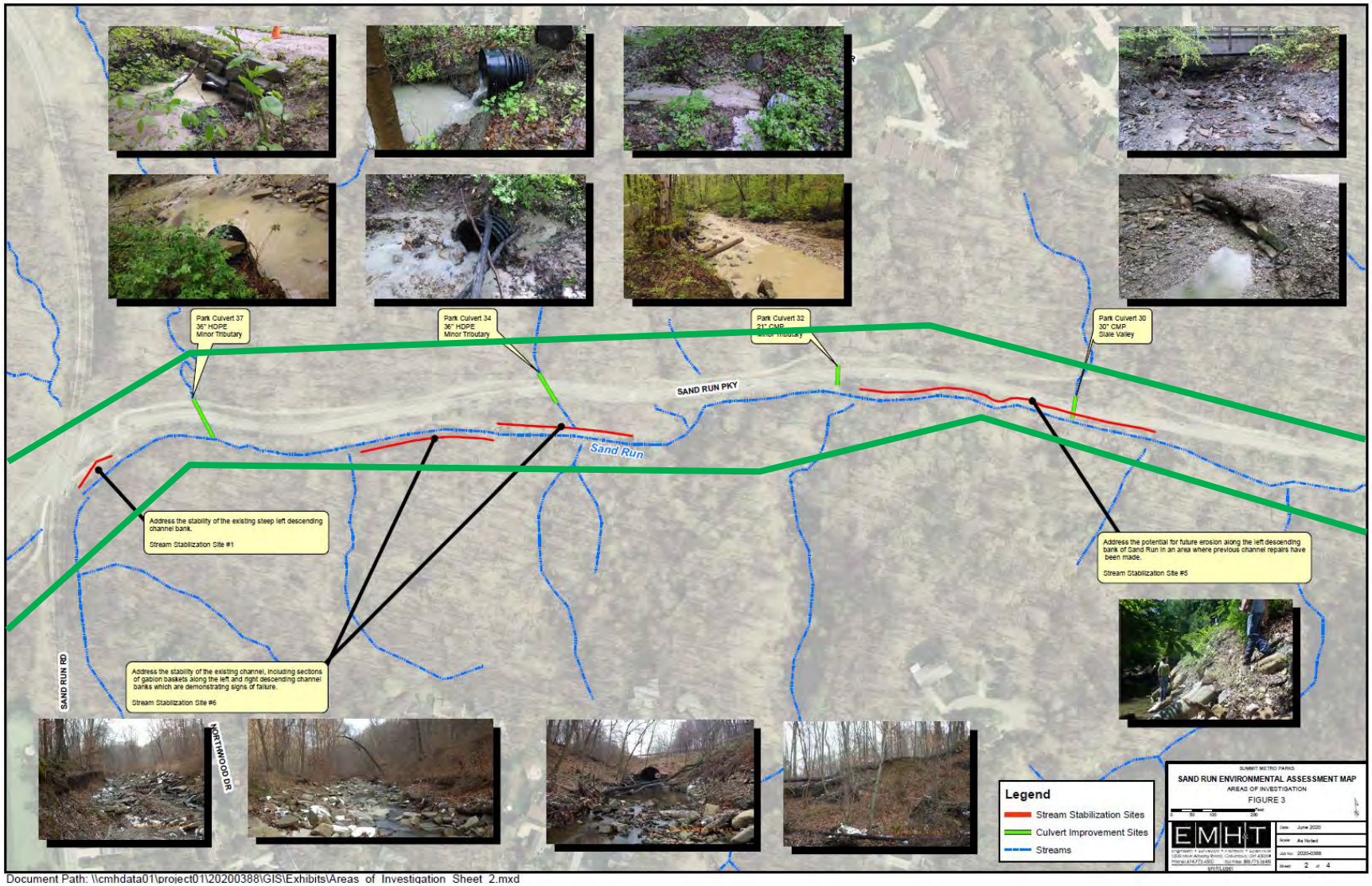


Revised APE noted in green; "grassy area in front of the Mingo Pavilion" noted in yellow (*GoogleEarth*)

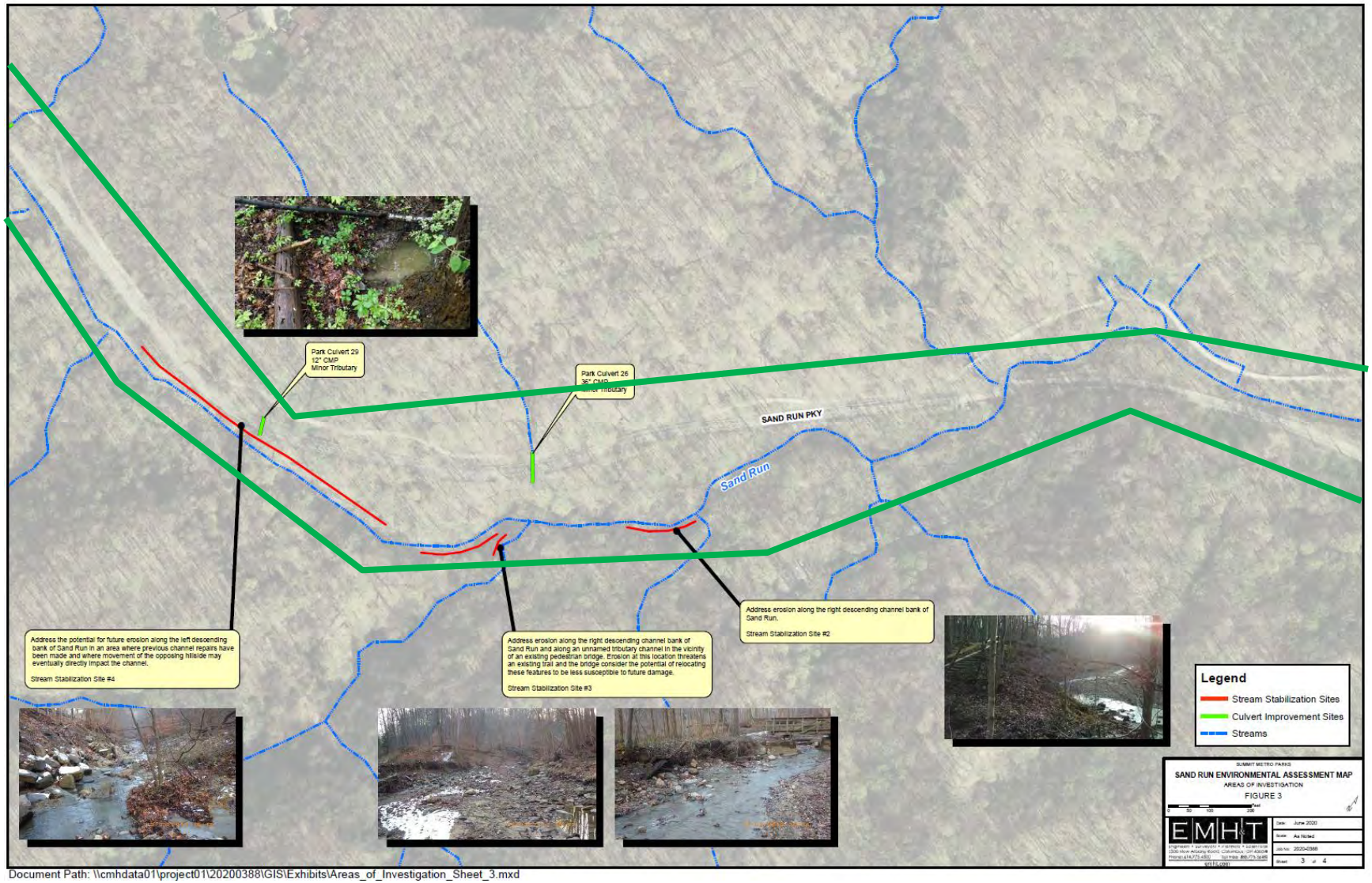
Proposed APE boundaries noted in green



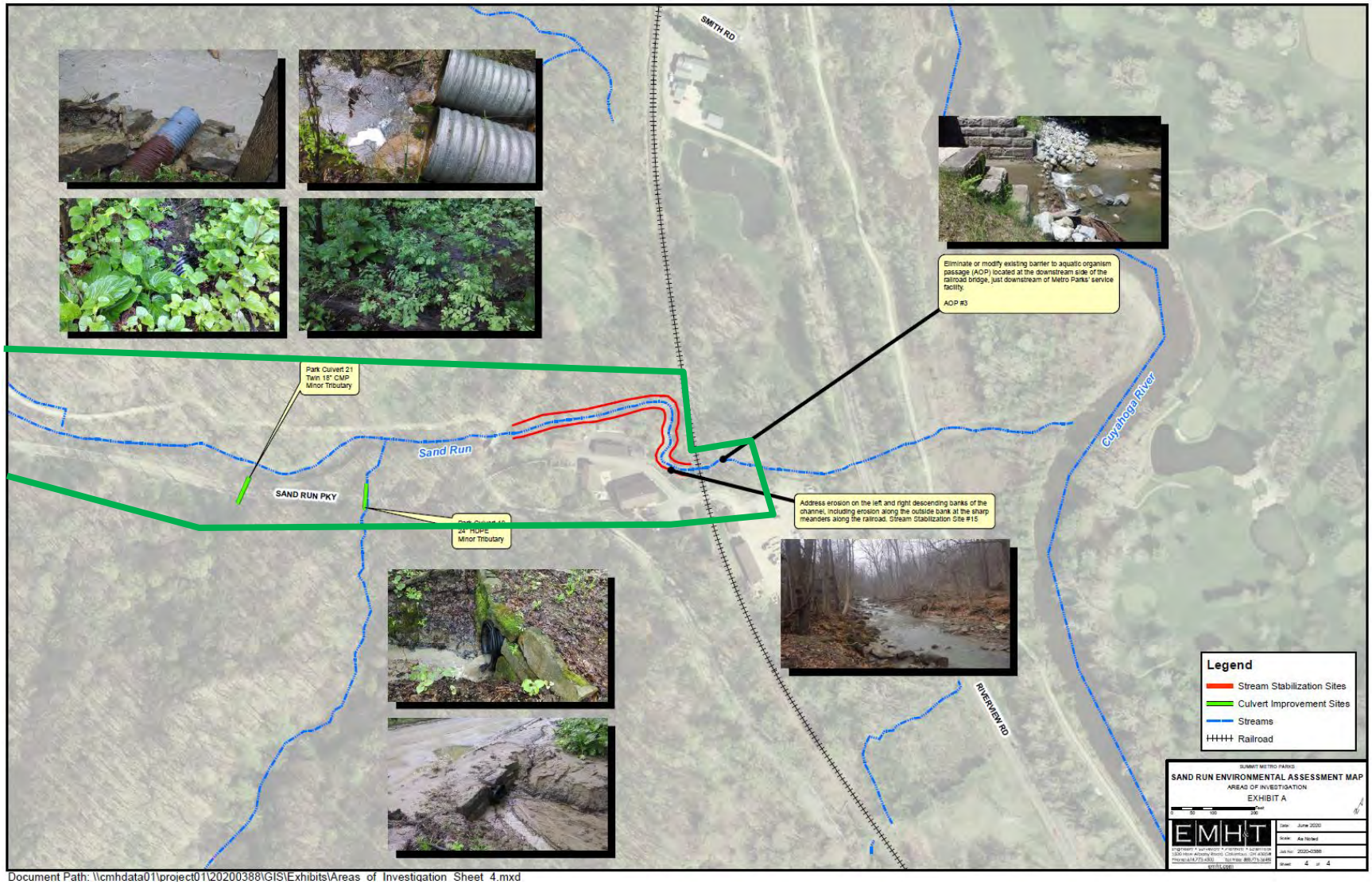
Proposed APE boundaries noted in green



Proposed APE boundaries noted in green



Proposed APE boundaries noted in green



OHIO HISTORY CONNECTION

In reply refer to
2019-SUM-44139

March 14, 2019

Dan Clevidence
Ohio EMA
2855 W. Dublin Road
Columbus, Ohio 43235

Dear Mr. Clevidence:

Re: Summit Metro Parks, Sand Run Parkway Protection, 975 Treaty Line Road, Akron, Summit County, Ohio

This is in response to your correspondence, received on February 25, 2019, regarding this project. The undertaking is defined as eleven locations of erosion control along Sand Run parkway in Akron, Summit County, Ohio. My comments are made pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated regulations at 36 CFR Part 800.

Based on the information submitted, it is my opinion that the proposed undertaking will not affect properties listed in or eligible for listing in the National Register of Historic Places. No further coordination is required unless the project changes or archaeological remains are discovered during the course of the project. In such a situation, this office should be contacted as per 36 CFR 800.13.

Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs. If you have any questions, please contact me at (614) 298-2000, or by email at nyoung@ohiohistory.org.

Sincerely,

Nathan J. Young, Project Reviews Manager
Resource Protection and Review

Report of the Historic and Archaeological Investigations at Nature Realm and a portion of Sand Run Metro Park, City of Akron, Summit County, Ohio

By

Linda G. Whitman, MS, RPA
Lynn R. Metzger, PhD
Ann E. Donkin, BS
Michelle Davis, BA

Submitted to:

David Whited
Metro Parks Serving Summit County
975 Treaty Line Road
Akron, Ohio 43313-5898

Submitted by:

Community Archaeology Program
Department of Classical Studies, Anthropology and Archaeology
University of Akron
Olin Hall, Room 237
Akron, Ohio 44325-1910

NOVEMBER 2008

Castaldi, Duane

From:
Sent:
To:
Subject:

Hello Mr. Castaldi,
Seneca Nation wishes to consult only in the event if cultural resources or burials are uncovered. Thank you for sharing the paperwork with me. I appreciate it; however, because of the site location, we don't have an opinion on the protection of the area unless it uncovers something. I hope you understand.

Again, thank you,

Joe

From: Castaldi, Duane [mailto:Duane.Castaldi@fema.dhs.gov]
Sent: Monday, June 15, 2020 8:03 AM
To: Joe Stahlman <Joe.Stahlman@sni.org>
Subject: FEMA NEPA Scoping Document, Summit County, Ohio

Good Morning.

Please see attached letter and document. If you have questions or comments, please call or e-mail.

Thanks

Duane D. Castaldi
Regional Environmental Officer
U.S. Department of Homeland Security
FEMA Region V

536 South Clark Street, 6th Floor
Chicago, IL 60605
O: 312-408-5549
E: duane.castaldi@fema.dhs.gov

Appendix E

Floodplain Management Eight-Step Documentation

EXECUTIVE ORDER 11988

FLOODPLAIN MANAGEMENT CHECKLIST (44 CFR Part 9)

TITLE: Sand Run Stabilization and Infrastructure Improvement Project

PROPOSED ACTION: The Proposed Action has three components: (1) stream stabilization at 13 sites, (2) culvert improvements at 9 sites, and (3) creation of a custom fish passage at a site with an abrupt elevation change. All actions will occur on Sand Run and an unnamed tributary to Sand Run between Revere Road and the Cuyahoga Railroad bridge east of the Sand Run Metro Park Service Center, as identified in the Preliminary Engineering Report (EMH&T, 2018).

The stream stabilization component will include ecological enhancements such as natural channel design techniques to improve aquatic habitat. Where possible, stream stabilization includes channel restoration with rock vanes, slope regrading using natural stone and native vegetation, and a natural meandering channel.

The 9 culvert improvements will address deficiencies in hydraulic capacity and physical condition. All culvert trenches will be backfilled using controlled density fill to provide additional stability for the roadway and to minimize the introduction of lime into the receiving channel. Culvert outfall scour protection will consist of natural stone materials provided from local vendors

The aquatic organism passage improvement will address an abrupt stream grade elevation change at one site located immediately downstream of the Cuyahoga Scenic Valley Railroad bridge, north of the park's Service Center. This severe grade change creates a barrier to aquatic organisms from Sand Run to the downstream confluence with the Cuyahoga River. At this location there is a five-foot channel drop measured from the edge of the railroad bridge down to the bottom of a scour pool. The project will construct a custom fish passage that will function similar to a fish ladder, with large stones carefully placed to create a gradually stepped incline, to facilitate movement of aquatic organisms. There will be no modification to the railroad structure.

APPLICABLILITY: Actions which have the potential to affect floodplains or their occupants, or which are subject to potential harm by location in floodplains.

☒ **YES** ☐ **NO** The proposed action could potentially adversely affect the floodplain.

☒ **YES** ☐ **NO** The proposed action could potentially be adversely affected by the floodplain.

Remarks: Per FEMA Flood Insurance Rate Map Panel Nos. 391530113F, 391530114F, 391530118F effective 04/19/2016, The project is within a Special Flood Hazard Area, Zone A, with no published Base Flood Elevation (BFE) or delineated floodway. The upstream limit of FEMA's study within the project area begins just East of North Revere Road. The entire length of Sand Run within the project area is mapped in limited detail. Immediately downstream of the project, Sand Run empties into the Cuyahoga River. The proposed modifications to the stream banks, culverts, and installation of an organism passage introduce changes to the hydraulics and hydrology that have the potential impact stream velocity and flood heights.

IF BOTH ANSWERS ARE NO, REVIEW IS COMPLETED, OTHERWISE CONTINUE WITH REVIEW.

Mark the review steps required per applicability: ☒ 1 / ☒ 2 / ☒ 3 / ☒ 4 / ☒ 5 / ☒ 6 / ☒ 7 / ☒ 8

CRITICAL ACTION: ☐ **YES** Review against 500 Year floodplain

☒ **NO** Review against 100 Year floodplain

SCOPE OF WORK: See Proposed Action detail above.

STEP NO. 1: Determine whether the proposed action is in the 100-year floodplain, or, for critical actions, in the 500-year floodplain.

☒ **YES** ☐ **NO** Proposed improvements are within the Special Flood Hazard Area, Zone A.

IF THE ANSWERS IS YES, CONTINUE WITH THE FOLLOWING STEPS; OTHERWISE REVIEW IS COMPLETE.

STEP NO. 2: Notify the public at the earliest possible time of the intent to carry out an action in a floodplain and involve the affected and interested public in the decision-making process.

☐ Notice was provided as part of a disaster cumulative notice.

Newspaper:

Date:

☒ Project-specific notice provided.

Publication: *Akron Beacon Journal*

Date: April 1, 2019

☐ Per allowances noted at 44 CFR Part 9.12(d)6, this notice is understood to meet the requirements of both Steps 2 and 7.

STEP NO. 3: Identify and evaluate practicable alternatives to locating the proposed action in a floodplain (including alternatives sites, actions and the "no action" option). If a practicable alternative exists outside the floodplain, FEMA must locate the action at the alternative site.

☐ **YES** ☒ **NO** Is there a practicable alternative site location outside of the floodplain / wetland?

Remarks: For this project, the purpose is to reduce erosion and flood-related damage to park and City infrastructure that is directly within the water of Sand Run and its tributaries. There is no practicable alternative for the stabilization, culvert improvements, or organism passage to occur outside of the floodplain.

☐ **YES** ☒ **NO** Is there a practicable alternative action outside of the floodplain / wetland that will not affect the floodplain / wetland?

Remarks: No practicable alternative exists outside the floodplain.

☐ **YES** ☒ **NO** Is the No Action Alternative the most practicable alternative?

Remarks: As addressed in the Environmental Assessment, taking no action will leave park and City infrastructure exposed to additional flood damage.

IF ANY ANSWER IS YES, THEN FEMA SHALL TAKE THAT ACTION AND THE REVIEW IS CONCLUDED.

STEP NO. 4: Identify and evaluate practicable alternatives to locating the proposed action in a floodplain (including alternatives sites, actions and the "no action" option). If a practicable alternative exists outside the floodplain, FEMA must locate the action at the alternative site.

☐ **YES** ☒ **NO** Is the Proposed Action based on incomplete information?

☒ **YES** ☐ **NO** Is the proposed action in compliance with the NFIP?

☐ **YES** ☒ **NO** Does the proposed action increase the risk of flood loss?

☐ **YES** ☒ **NO** Will the proposed action result in an increased base discharge or increase the flood hazard potential to other properties or structures?

☐ **YES** ☒ **NO** Does the proposed action minimize the impact of floods on human health, safety and welfare?

☐ **YES** ☒ **NO** Will the proposed action induce future growth and development, which will potentially adversely affect the floodplain?

☒ **YES** ☐ **NO** Does the proposed action involve dredging and/or filling of a floodplain?

☐ **YES** ☒ **NO** Will the proposed action result in the discharge of pollutants into the floodplain?

☒ **YES** ☐ **NO** Does the proposed action avoid long- and short-term adverse impacts associated with the occupancy and modification of floodplains?

☐ **YES** ☒ **NO** Will the proposed action result in any indirect impacts that will affect the natural values and functions of floodplains or wetlands?

☐ **YES** ☒ **NO** Will the proposed action forego an opportunity to restore the natural and beneficial values served by floodplains?

☒ **YES** ☐ **NO** Does the proposed action restore and/or preserve the natural and beneficial values served by floodplains?

☒ **YES** ☐ **NO** Will the proposed action result in an increase to the useful life of a structure or facility?

Remarks: The project has multiple purposes, including improving water and stream habitat quality and reducing flooding and erosion within the Sand Run Metro Park. The project will result in long-term improvements to stream function while maintaining the natural and beneficial functions of the floodplain throughout Sand Run Metro Park. The project will have long-term beneficial effects by slowing velocity and reducing erosion. The project will require fill in the floodplain consisting of clean earth (1,000 cyd) and rock (7,500 cyd) at multiple locations along Sand Run, from approximately 400 feet downstream of the railroad bridge to the confluence with an Unnamed Tributary west of Sand Run Road, as well as along the Unnamed Tributary from the confluence with Sand Run to Revere Road. The stream improvements also require realigning 150 LF of the Unnamed Tributary channel immediately upstream of the confluence with Sand Run to restore stability. The engineering study indicates that the project will not result in a significant change in base flood elevations and comply with local floodplain management regulations. This project has no impact on the Cuyahoga River base flood heights or discharge.

STEP NO. 5: Minimize the potential adverse impacts to or within floodplains identified under Step 4; restore and preserve the natural and beneficial values served by floodplains.

☒ **YES** ☐ **NO** For sites in the 500-Year floodplain, were flood hazard reduction techniques applied to the proposed action to minimize the flood impacts?

☒ **YES** ☐ **NO** Were avoidance and minimization measures applied to the proposed action to minimize the short and long-term impacts on the 100-Year floodplain?

☒ **YES** ☐ **NO** Were measures implemented to restore and preserve the natural and beneficial values of the floodplain?

Remarks: The project was developed with the natural and beneficial functions of floodplains in mind, examples include use of natural stone, native vegetation, and a variety of bio-engineering techniques that where possible will reduce erosion and lower stream velocity.

STEP NO. 6: Reevaluate the proposed action to determine first, if it is still practicable in light of its exposure to flood hazards, the extent to which it will aggravate the hazards to others, and its potential to disrupt floodplain values and second, if alternatives preliminarily rejected at Step 3 are practicable in light of the information gained in Steps 4 and 5. FEMA shall not act in a floodplain unless it is the only practicable location.

☒ **YES** ☐ **NO** The action is still practicable at a floodplain site considering the exposure to flood risk and ensuing disruption of natural values.

☒ **YES** ☐ **NO** The floodplain site is the only practicable alternative.

☒ **YES** ☐ **NO** There is no potential for limiting the action to increase the practicability of previously rejected sites outside the floodplain and alternative actions.

☒ **YES** ☐ **NO** Minimization of harm to or within the floodplain can be achieved using all practicable means.

☒ **YES** ☐ **NO** The action in a floodplain clearly outweighs the requirement of E.O. 11988.

Remarks: The project results in benefits to the park, stream, and floodplain resources. The proposed improvements do not result in any significant increases in base flood elevations.

STEP NO. 7: Prepare and provide the public with a finding and public explanation of any final decision that the floodplain is the only practicable alternative.

☐ Per allowances noted at 44 CFR Part 9.12(d)6, notice provided under Step 2 is understood to meet the requirements of both Steps 2 and 7.

☐ Notice was provided as part of a disaster cumulative notice.

Newspaper:

Date:

☒ Project-specific notice provided.

Publication: See EA Appendix F, Public Notice and Comments

Date: See EA Appendix F, Public Notice and Comments

AFTER PROVIDING THE FINAL NOTICE, FEMA SHALL, WITHOUT GOOD CAUSE SHOWN, WAIT AT LEAST 15 DAYS BEFORE CARRYING OUT THE PROPOSED ACTION.

STEP NO. 8: Review the implementation and post-implementation phases of the proposed action to ensure that the requirements stated in Section 9.11 are fully implemented. Oversight responsibility shall be integrated into existing processes (44 CFR §9.11).

☒ **YES** ☐ **NO** Was Grant conditioned on review of implementation and post-implementation phases to ensure compliance with EO 11988?

Remarks: The Environmental Assessment requires local floodplain development permits be obtained prior to construction from both the Cities of Fairlawn and Akron.

FAILURE TO COMPLY WITH CONDITIONS ENUMERATED IN THE RECORD OF ENVIRONMENTAL CONSIDERATION MAY JEOPARDIZE FEDERAL FUNDING.

Appendix F

Public Notice & Comments

Federal Emergency Management Agency
PUBLIC NOTICE
Notice of Availability of the Draft Environmental Assessment for the Sand Run Stabilization and Infrastructure Improvement Project in Summit County, Ohio

Environmental Assessment (EA) for the Sand Run Stabilization and Infrastructure Improvement Project (Application Number: 4360.13-R).

Interested persons are hereby notified that the Federal Emergency Management Agency (FEMA)/Department of Homeland Security (DHS) is proposing to assist in the funding of a project located in Summit County, Ohio. In accordance with the National Environmental Policy Act (NEPA) of 1969 and the implementing regulations of FEMA, an EA is being prepared to assess the potential impacts of each of the proposed alternatives on the human and natural environment. This also provides public notice to invite public comments on the proposed project in accordance with Executive Order 11988, Floodplain Management, and Executive Order 11990, Protection of Wetlands. In addition, this notice and the draft EA provide information to the public on potential impacts to historic and cultural resources from the proposed undertaking, as outlined in the National Historic Preservation Act (NHPA) of 1966.

This EA is available for agency and public review and comment for a period of 30 days. The EA is available on FEMA's website at *https://www.fema.gov/emergency-managers/practitioners/environmental-historic/region/5*. The EA is also available on the Summit Metro Parks website at *https://www.summitmetroparks.org/public-notices.aspx*. Interested parties may request an electronic copy of the EA from either of those websites.

A hard copy of this EA can be made available upon request, by contacting the FEMA Region V Regional Environmental Officer, Mr. Duane Castaldi. Mr. Castaldi's contact information is provided below.

Written comments regarding this environmental action should be received no later than 5 p.m. on October XX, 2020, by mail to Duane Castaldi, Regional Environmental Officer, FEMA Region V, 536 South Clark Street, 6th Floor, Chicago, IL 60605-1521; or by email at *duane.castaldi@fema.dhs.gov*. If no substantive comments are received by the above deadline, the draft EA and associated Finding of No Significant Impact (FONSI) will become final and be published by FEMA. Substantive comments will be addressed as appropriate in the final documents.

The public may request a copy of the final environmental documents from Duane Castaldi at the address listed above.

Summit Metro Parks – Executive Board Meetings
Summary of Meeting Minutes related to Sand Run Metro Park FEMA-funded project

March 10, 2020 : AUTHORIZATION TO SIGN FEMA FORM

For several years, Summit Metro Parks has been preparing stream restoration plans and habitat improvements for Sand Run stream that flows through Sand Run Metro Park. Funding has been secured through a Clean Ohio Conservation Fund and a grant has been submitted to the Ohio Department of Public Safety for State Hazard Mitigation Funds via the Federal Emergency Management Agency (FEMA).

FEMA has authorized $57,750 to prepare documents in compliance with the National Environmental Policy Act (NEPA). This grant requires a $7,218.50 local match to be paid by Summit Metro Parks. FEMA also requires a specific resolution format (attached) to be voted on and approved prior to receiving funding.

The Executive Director requested the Board of Park Commissioners to authorize and sign the FEMA form.

Resolution 28.2020

The Board of Park Commissioners authorized and signed the FEMA form

Thank you,

Shannon Hasenstab
Chief of Customer Service
Summit Metro Parks

975 Treaty Line Rd.
Akron, Ohio 44313
330-867-5511
summitmetroparks.org

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Publication County:
Summit

Notice Popular Keyword Category:

Notice Keywords:
summit metro parks

Notice Authentication Number:
201904020851464591934
1255875338

Notice URL:

Back

Notice Publish Date:
Monday, April 01, 2019

Notice Content

04/02/2019 PUBLIC NOTICE The Summit Metro Parks, in conjunction with the Ohio Emergency Management Agency (OEMA) and the Federal Emergency Management Agency (FEMA) has applied for a Unified Hazard Mitigation Program Project for the replacement of a culvert and the restoration and stabilization of several sections of stream channel adjacent to Sand Run Parkway in Sand Run Metro Park to mitigate future roadway damage. Under the National Environmental Policy Act (NEPA), EO 11988 and EO 11990, public notice is required of any federal actions that affect floodplains or wetlands. All necessary permits will be obtained prior to construction and completion of the project. The objectives of the Unified Hazard Mitigation Program are to prevent future losses of lives and property, to implement state or local Hazard Mitigation plans, to enable mitigation measures to be implemented during immediate recovery from disaster, and to provide funding for identified and approved hazard mitigation projects. Public participation is encouraged. Interested parties and/or citizens are invited to comment on the project either in writing to: Duane Castaldi, Regional Environmental Officer FEMA Region V 536 South Clark St, 6th Floor Chicago, IL 60605 Or comments may be directed via e-mail to Mr. Castaldi: Duane.Castaldi@fema.dhs.gov Summit Metro Parks Lisa M. King, Executive Director Apr 2

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Public Bids

Legal Notices

- Public Notice - Sand Run Parkway Protection Project

Please complete the form below, and information will be sent to you.

CONTACT FORM

Summit Metro Parks

975 Treaty Line Rd.
Akron, OH 44313
330-867-5511

Contact Us

Administrative Offices:
330-867-5511
Weekdays, 8 a.m. to 4:30 p.m.

PUBLIC NOTICE

The Summit Metro Parks, in conjunction with the Ohio Emergency Management Agency (OEMA) and the Federal Emergency Management Agency (FEMA) has applied for a Unified Hazard Mitigation Program Project for the replacement of a culvert and the restoration and stabilization of several sections of stream channel adjacent to Sand Run Parkway in Sand Run Metro Park to mitigate future roadway damage.

Under the National Environmental Policy Act (NEPA), EO 11988 and EO 11990, public notice is required of any federal actions that affect floodplains or wetlands. All necessary permits will be obtained prior to construction and completion of the project.

The objectives of the Unified Hazard Mitigation Program are to prevent future losses of lives and property, to implement state or local Hazard Mitigation plans, to enable mitigation measures to be implemented during immediate recovery from disaster, and to provide funding for identified and approved hazard mitigation projects.

Public participation is encouraged. Interested parties and/or citizens are invited to comment on the project either in writing to:

Duane Castaldi, Regional Environmental Officer
FEMA Region V
536 South Clark Street, 6th Floor
Chicago, IL 60605

Or comments may be directed via e-mail to Mr. Castaldi: Duane.Castaldi@fema.dhs.gov

Summit Metro Parks
Lisa M. King, Executive Director

Summit Metro Parks – Executive Board Meetings
Summary of Meeting Minutes related to Sand Run Metro Park FEMA-funded project

From: Shannon Hasenstab <shasenstab@summitmetroparks.org>
Sent: Thursday, August 27, 2020 11:48 AM
To: Mike Johnson <mjohnson@summitmetroparks.org>
Subject: RE: board minutes

Here's what I could find so far on the board minutes. I will look through emails too.

GRANTS
Subject: Authorization to Apply for Ohio EPA Section 319 Grant for Sand Run Stream Restoration
Resolution Number: 25.2019
Date: 02/12/2019

Description: The Executive Director was authorized to apply for the Ohio EPA Section 319 Grant fund for the amount not to exceed $400,000, for the preservation and restoration of park property and is further authorized to sign the necessary grant documents on behalf of Summit Metro Parks.

Amount: $400000.00

GRANTS
Subject: Authorization to Apply for Clean Ohio Grant for Sand Run Stream Restoration
Resolution Number: 100.2018
Date: 09/11/2018

Description: The Executive Director was authorized to apply for the Clean Ohio Conservation Fund grant for the amount not to exceed $500,000, for the preservation and restoration of park property and is further authorized to sign the necessary grant documents on behalf of Summit Metro Parks.

Amount: $500000.00

Category: FUNDING
Subject: Authorization for Matching Funds for Ohio Edison Dam Study
Resolution Number: 27.2014
Date: 01/30/2014

Description: The Director-Secretary was authorized to provide Ohio EPA permission to use approximately $500,000 in funding that the park district is spending on Sand Run restoration feasibility and design for purposes of matching funds for a federal grant, being applied for by Ohio EPA, for study of issues relating to the Ohio Edison Dam.
Amount: $500000.00

****
****

Restoring & Protecting Sand Run Metro Park (Part I)

Summit Metro Parks Follow
Jul 15 · 4 min read

This is the first in a series of posts about upcoming grant-funded improvements to protect the roads, trails and wildlife of a well-loved park.

As the park district's oldest and busiest park, Sand Run Metro Park is getting some much-needed love beginning this summer. With the help of an external grant from the Clean Ohio

fund, Summit Metro Parks is making several infrastructure and ecological improvements to Sand Run over the coming months.

These improvements aren't always in plain view, but they are critical to Sand Run's long-term sustainability. And while construction will cause a temporary inconvenience for pedestrians and drivers, it will ultimately benefit the public by improving conditions in the stream for fish and other aquatic life and protecting the park's roads and trails.

This Clean Ohio grant funding will help the park district replace pipe culverts with structures that allow fish and wildlife to pass under Sand Run Parkway, create riffle structures and deeper pool habitats for fish, and overcome one of three major fish migration barriers along the stream. In addition to this funding for these ecological improvements, Summit Metro Parks has also received a grant from the Ohio Emergency Management Agency and Federal Emergency Management Agency (FEMA) to begin infrastructure improvements to protect the park's road, utilities and buildings.

Sand Run stream includes several man-made impediments to fish migration.

Sand Run Metro Park and its namesake stream are facing two significant challenges:

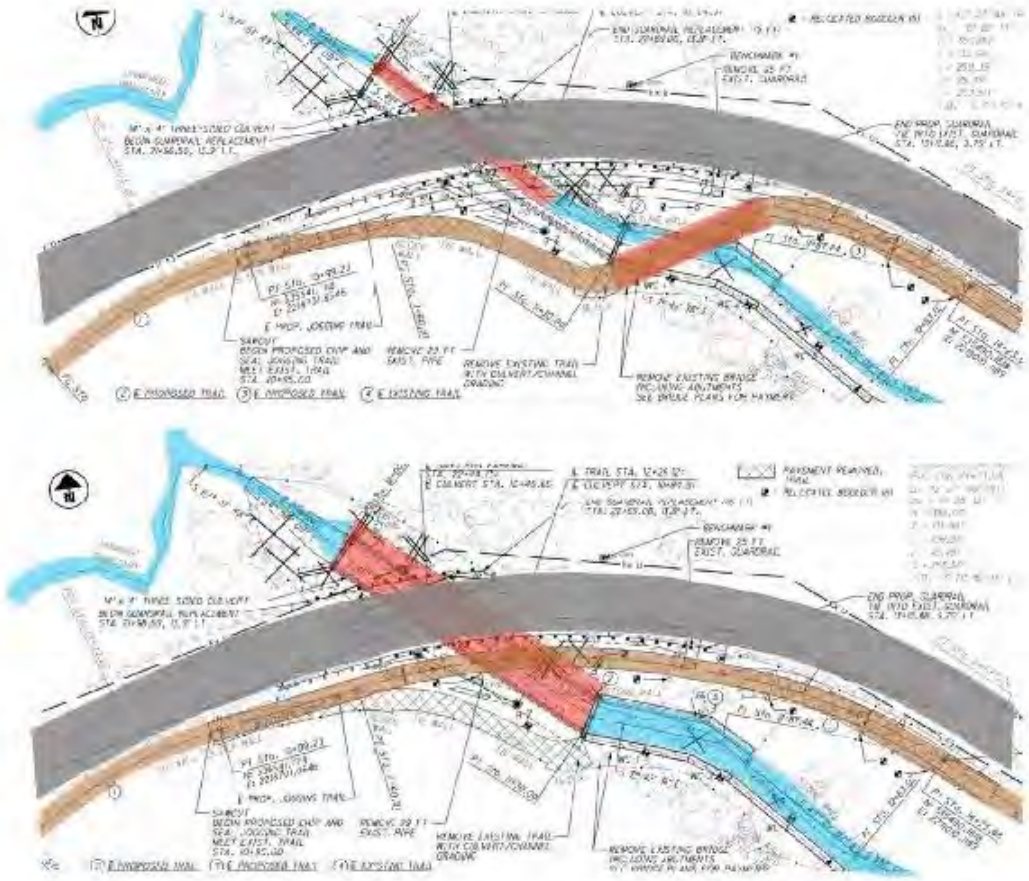
1. Because the Sand Run is located in an area that has been highly developed with homes, shopping centers and roads, **stormwater runoff** has created significant erosion in the park and destabilized the stream's banks.

2. Over the decades, infrastructure such as roads, culverts and pipelines have been built as the surrounding communities were developed, creating **migration barriers** that make it extremely difficult for fish to travel freely throughout the waterway.

The failing pedestrian bridge is closed and the Jogging Trail has been temporarily rerouted around it.

Phase 1 — Ecological Improvements: It's not often that a project addresses both an ecological need and an infrastructure necessity, but the first phase of our efforts to restore Sand Run does just that. With Clean Ohio grant funding, SMP will remove a bridge in need of repairs located along the Jogging Trail and replace it with a larger culvert running under Sand Run Parkway. This will create a more sustainable long-term

solution while also allowing fish and other critters to travel more freely in this section of the stream.



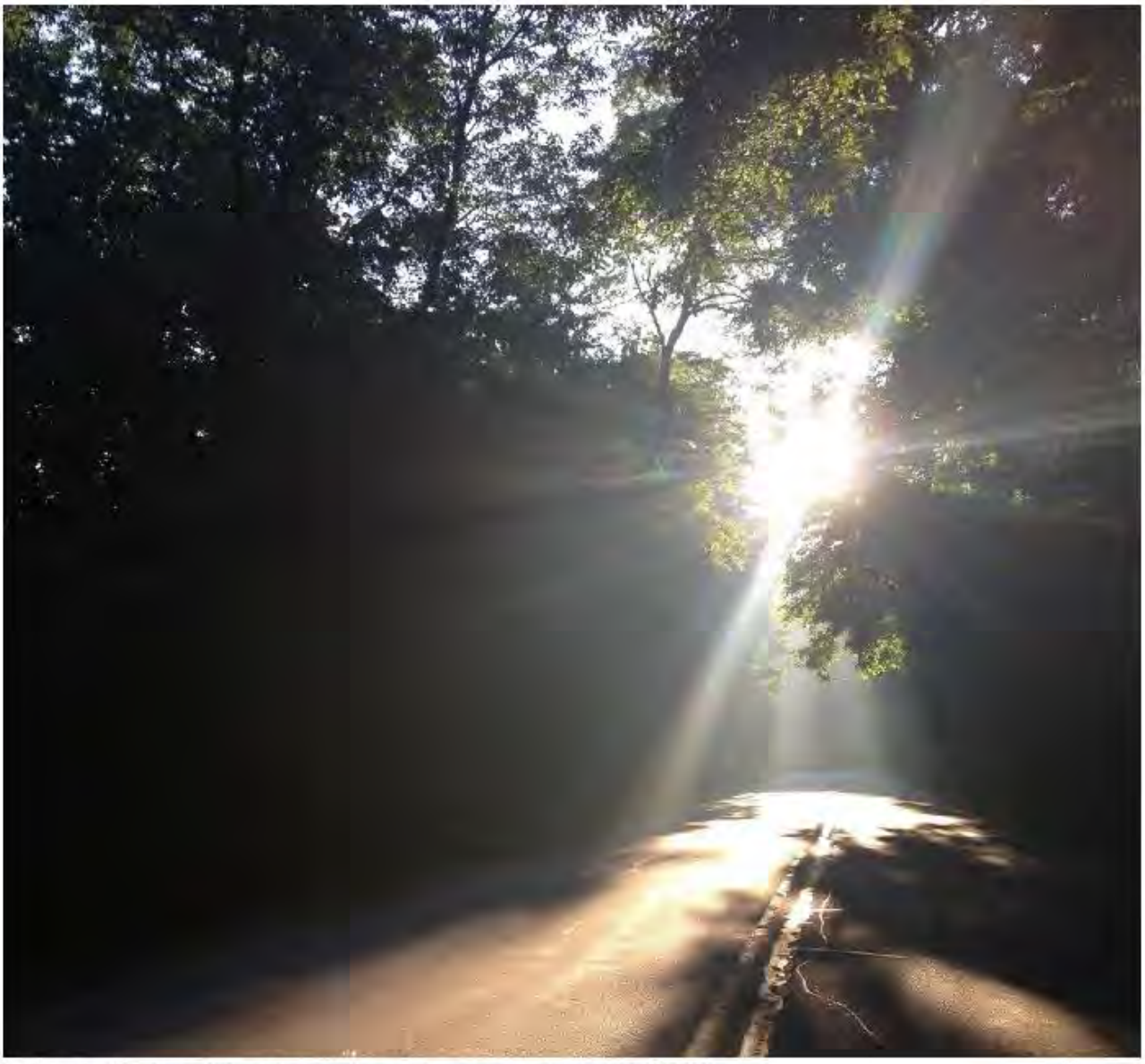
The existing small culvert and Jogging Trail bridge will be removed and replaced with a larger culvert. The trail will pass over the new culvert, eliminating the need for a pedestrian bridge and creating a wildlife corridor under the roadway.

Completing this work safely will require temporary closure of both the Jogging Trail and Sand Run Parkway between Revere Rd. and Sand Run Rd. The closure will begin June 20 and continue for approximately three months. The parking lots at Old Portage, Lone Spruce, Wadsworth and Shadowfield Areas remain open. The Jogging Trail also remains open between Sand Run Rd. and Portage Path, and pedestrians are invited to use the portion of Sand Run Parkway between Portage Path and Merriman Rd., which is currently closed to vehicle traffic.

Additional projects funded by the include creating a fish migration pathway at the railroad bridge near Riverview Road, addressing stream bank stabilization throughout the park, and installing several fish habitat structures within the stream.

Phase 2 — Infrastructure Improvements: In the next phase of work, Summit Metro Parks will utilize funding from the Ohio Emergency Management Agency and FEMA to protect the roads, buildings, trails and other infrastructure of Sand Run Metro Park.

Phase 3 — Watershed Improvements: You can help! In the coming years, Summit Metro Parks will implement a suite of educational programming and tools to assist homeowners and businesses within the watershed reduce their stormwater runoff.



Sunrise on Sand Run Parkway

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This article is the first in a series to keep Summit County residents informed on progress towards restoring and protecting Sand Run Metro Park. Stay tuned for updates and tips for getting involved!

Summit Metro Parks

We're Your Back Yard

975 Treaty Line Rd., Akron OH 44313

NEWS RELEASE

July 15, 2020

Stephanie Walton
Chief of Marketing & Communications
330-865-8040 x215
swalton@summitmetroparks.org

Lindsay Smith
Marketing & Public Relations Manager
330-865-8040 x207
lsmith@summitmetroparks.org

SUMMIT METRO PARKS AWARDED FUNDING TO RESTORE AND PROTECT SAND RUN METRO PARK

Road and trail closures in effect beginning July 20

Beginning July 20 and continuing for approximately three months, a portion of Sand Run Parkway and the Jogging Trail will be closed to make the first in a series of grant-funded infrastructure and ecological improvements within Sand Run Metro Park. With the assistance of a $2 million Clean Ohio grant, the park district will address a pedestrian bridge in need of repair and improve wildlife habitat in the park.

"As the park district's oldest and busiest park, several updates have become necessary to Sand Run Metro Park's long-term sustainability," said Executive Director Lisa King. "While this project will result in temporary road and trail closures, it will ultimately benefit the public by improving conditions in the stream for fish and other aquatic life and protecting the park's roads and trails."

Construction will result in the temporary closure of the Revere Rd. parking lot, as well as Sand Run Parkway and the Jogging Trail between Revere Rd. and Sand Run Rd. The parking lots at Old Portage, Lone Spruce, Wadsworth and Shadowfield Areas remain open. The Jogging Trail remains open between Sand Run Rd. and Portage Path, and pedestrians are also invited to use the portion of Sand Run Parkway between Portage Path and Merriman Rd., which is currently closed to vehicle traffic.

Sand Run Metro Park has long faced challenges from stormwater runoff, and the stream is also impacted by several barriers to fish migration. In this project, a bridge at

the end of its useful life will be replaced with a culvert, establishing a safe and sustainable long-term pedestrian crossing while also allowing fish and wildlife to pass under the roadway. Additional work will create riffle structures and deeper pool habitats for fish and mitigate one of three major fish migration barriers along the stream.

In addition to the Clean Ohio funding, the park district has received a grant from the Ohio Emergency Management Agency and Federal Emergency Management Agency to begin infrastructure improvements to protect the park's roads, utilities and buildings. This work is expected to begin within the next two years. In the future, Summit Metro Parks will also implement a suite of educational programming and tools to assist homeowners and businesses within the watershed reduce stormwater runoff to the park. For more information and images, please visit medium.com/@metro_parks.

* * * * *

Summit Metro Parks manages more than 14,000 acres, including 16 parks, several conservation areas and more than 150 miles of trails, with 22 miles of the Ohio & Erie Canal Towpath Trail. Annual attendance averages 5 million visits. Visit us online at summitmetroparks.org.

#summitmetroparks

Summit Metro Parks

November 15, 2018

To Whom It May Concern:

Summit Metro Parks supports the Sand Run Restoration Project and our organization is committed to maintaining the instream habitat and infrastructure improvements that would be implemented as part of the DR-4360 project submittal.

The Summit Metro Parks is a unit of local government formed under Chapter 1545 of the Ohio Revised Code. We are supported by a local property tax levy that currently generates 17 million dollars annually.

The operations department of the Summit Metro Parks employs 87 full time and part time staff with the skills necessary to maintain infrastructure of this nature. We currently maintain a roadway and facilities that will benefit from the proposed improvements and we are committed to continuing this work once the restoration work is complete.

Sincerely,

Aaron Hockman
Chief of Operations
Summit Metro Parks

975 Treaty Line Rd.
Akron, OH 44313-5837
330-867-5511
fax 330-867 4711
summitmetroparks.org