



Cleveland Opportunity Corridor Project

Reader-Friendly Environmental Impact Statement

Purdue Road School

March 10, 2015



Project Location



Purpose and Need

- Project purpose
 - Improve the roadway network within a historically underserved, economically depressed area in the City of Cleveland
- Project needs
 - Improve system linkage
 - Improve mobility
 - Support planned economic development
- Project goals
 - Improve public transportation connections
 - Improve facilities for pedestrians and cyclists



Preferred Alternative

- Urban boulevard
- Traffic lights at intersections
- Low grassy median
- Multi-purpose path on south
- Sidewalks on north
- 1.4 miles existing alignment
- 2.2 miles new alignment

Preferred Alternative

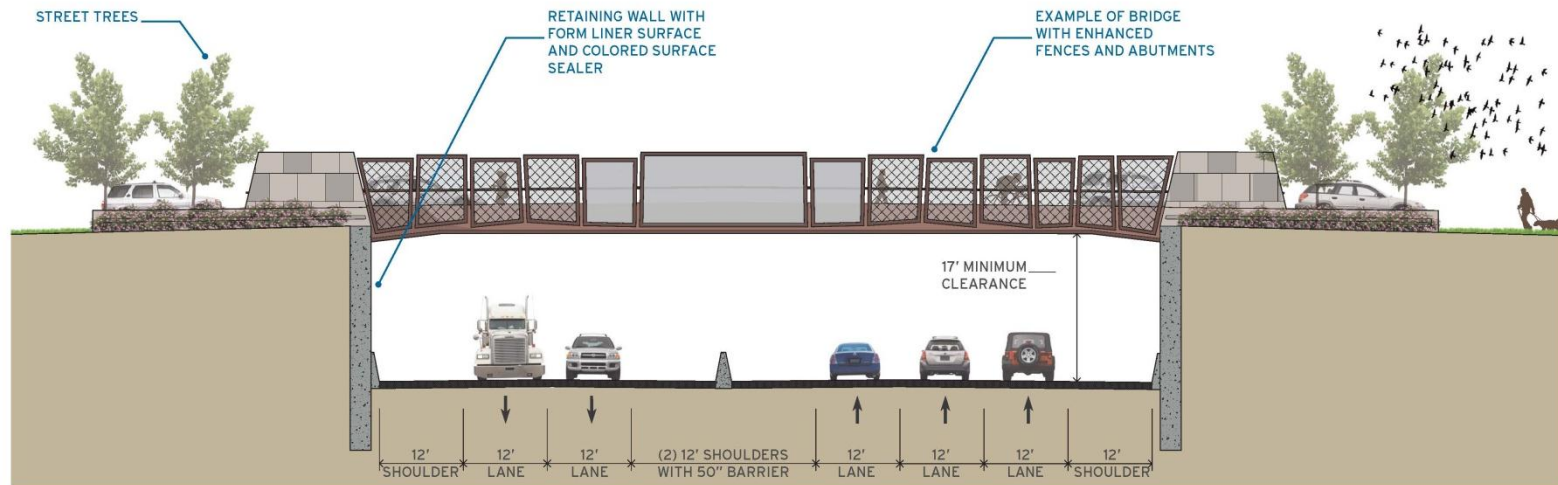


Source: Draft EIS (August 2013)

Preferred Alternative

E. 55TH ST. BRIDGE (CROSS-SECTION)

LOOKING EAST



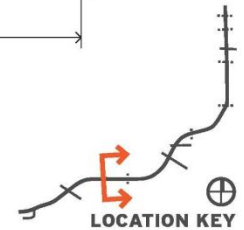
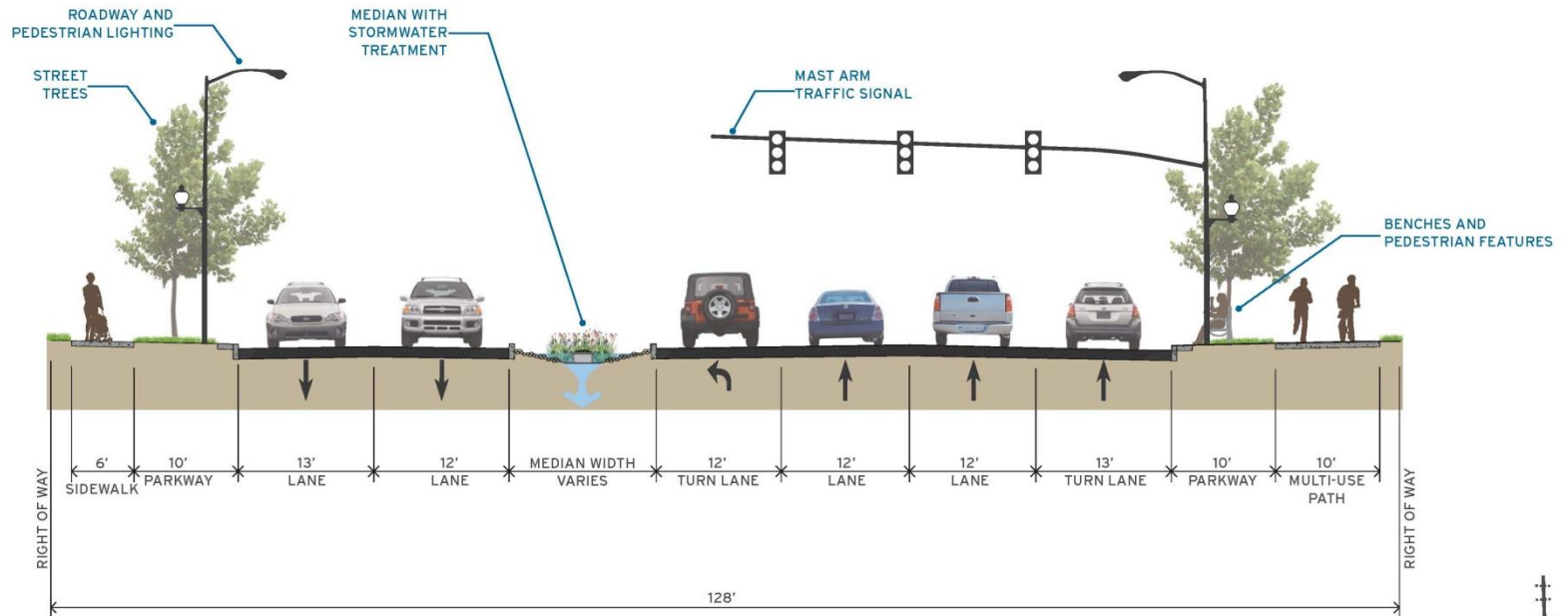
Source: Draft EIS (August 2013)



Preferred Alternative

TYPICAL BOULEVARD SIGNALIZED INTERSECTION (CROSS-SECTION)

LOOKING EAST



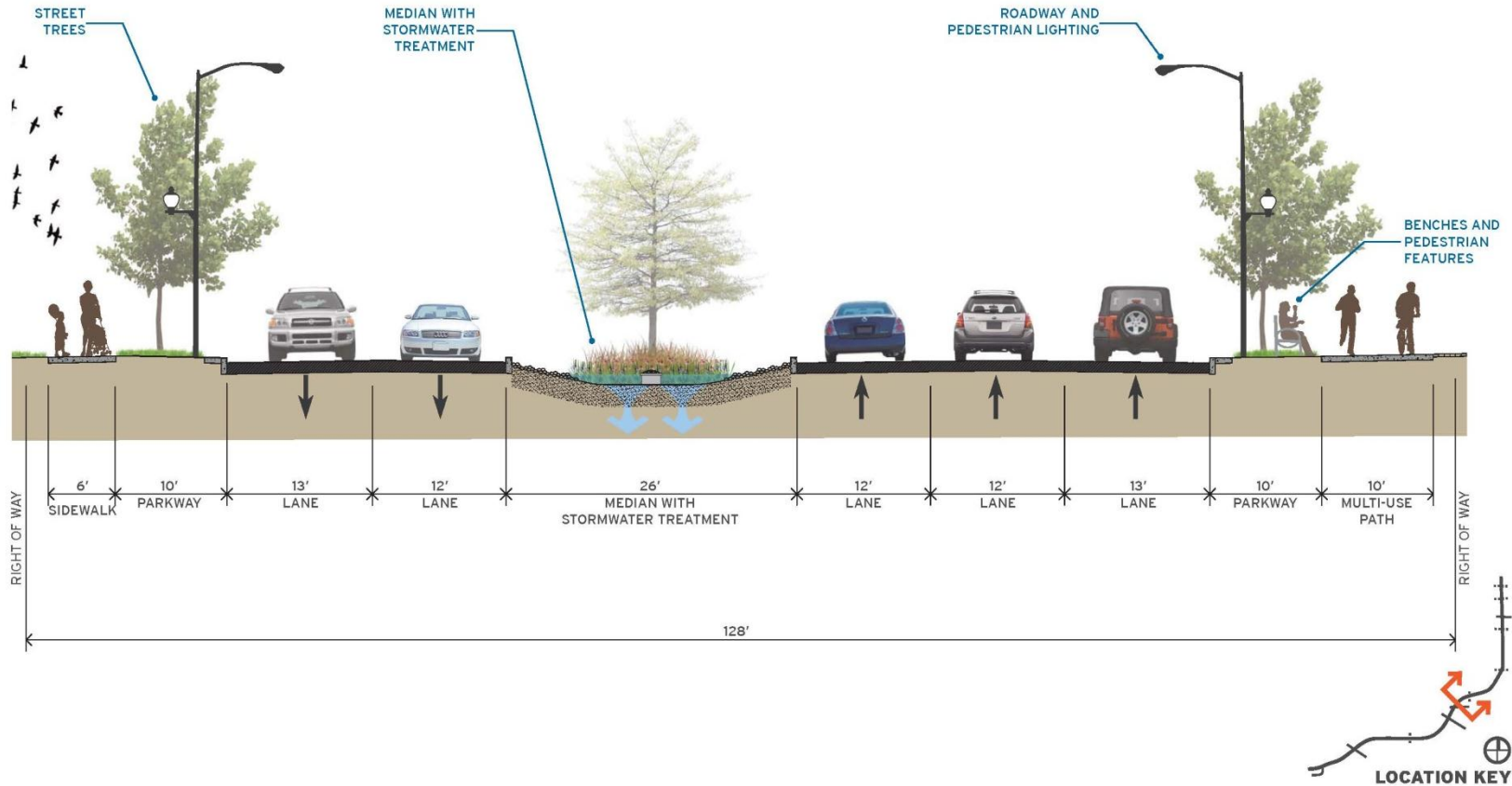
Source: Draft EIS (August 2013)



Preferred Alternative

TYPICAL BOULEVARD (CROSS-SECTION)

LOOKING EAST



Source: Draft EIS (August 2013)

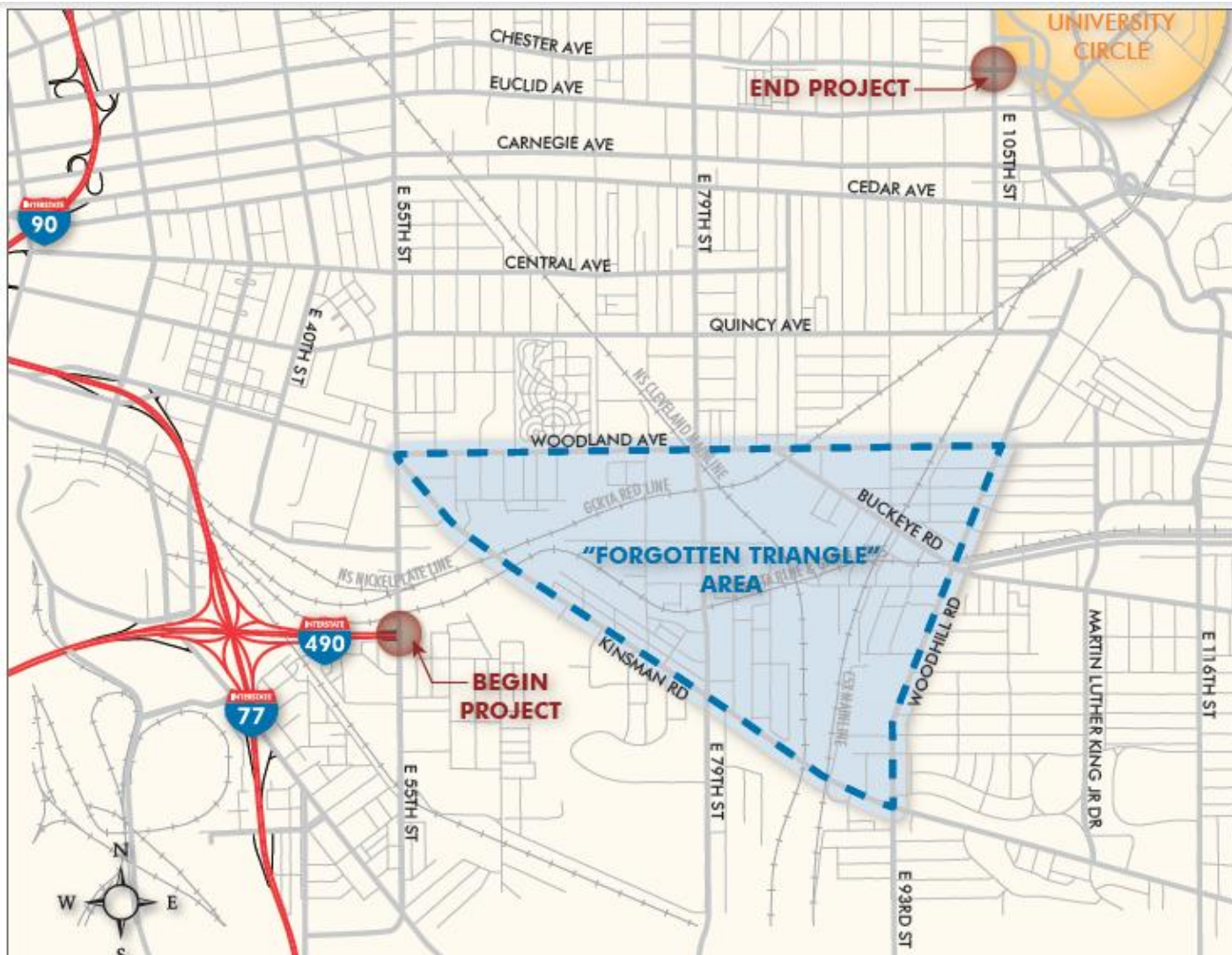


Project Area

- Urban
- Mixed land use
- No major natural resources
- Many human-made resources
- Vacant parcels
- Brownfields

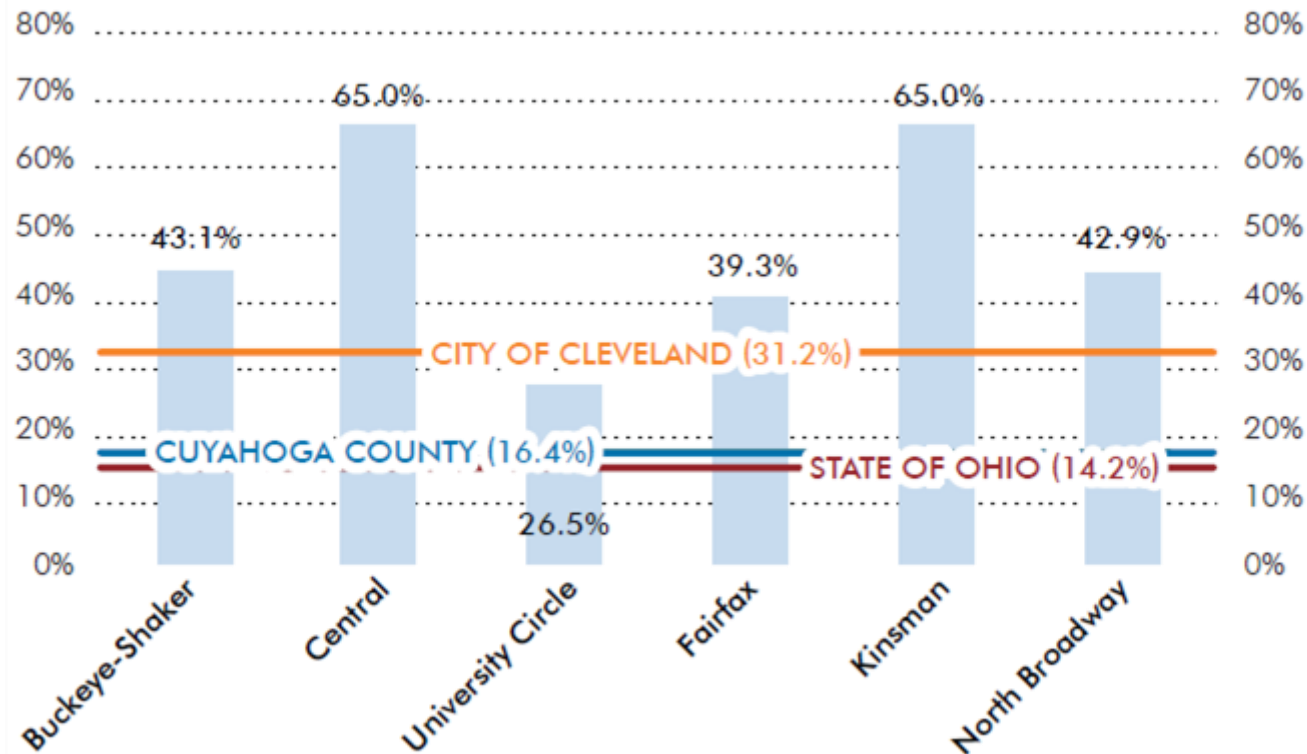


Project Area



Project Area

- 2010 percent persons below federal poverty level by neighborhood

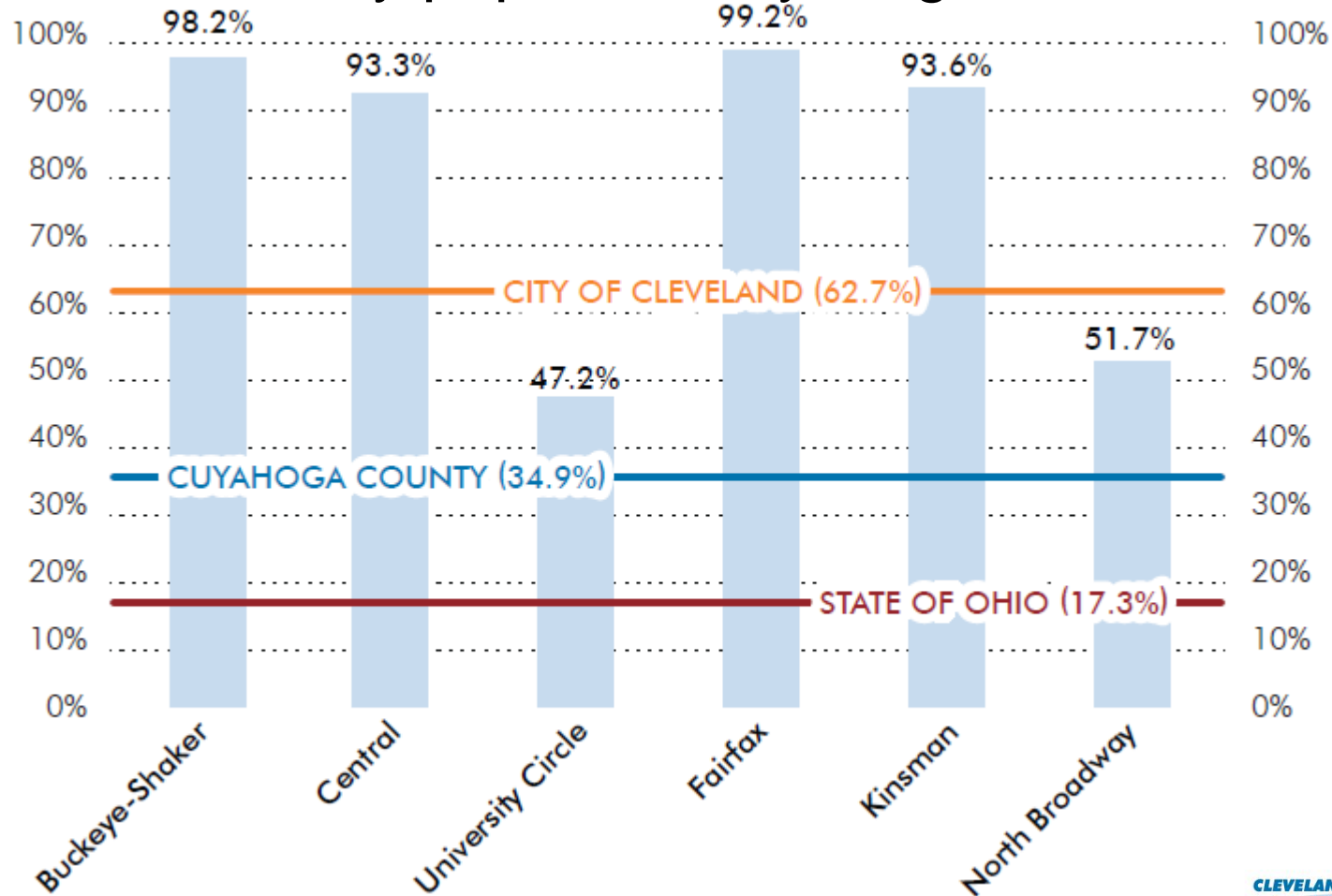


Source: Draft EIS (August 2013)



Project Area

- 2010 minority population by neighborhood



Source: Draft EIS (August 2013)



Project Impacts

Permanent Land – Acres (City Owned)	46.9 (10.2)
Potential Regulated Material Sites	42
Historic Sites	1
Park and Recreation Sites	1
Residential Structures (Relocations)	64 (76)
Church Displacements	1
Commercial Business Structures (Relocations)	25 (16)

Source: Draft EIS (August 2013)



Reader-Friendly EIS

- Extensive community (EJ) outreach
- Few impacts to natural environment
- Focus on community impacts



Good Fit for Reader-Friendly Approach



Reader-Friendly EIS

- Quality NEPA documents do not have to be lengthy and highly technical.

Lengthy	Concise
	😊
	😊
	😊
	😊
	😊
	😊
	😊
	😊
	😊
	😊

Concise/Reader-Friendly NEPA Documents
=
High-Quality NEPA Documents

Guiding Principles

- Craft an EIS that is like a good public involvement presentation
 - Convey and illustrate the project in a way that's clear to the public but meets technical requirements
- FHWA's Everyday Counts Initiative
 - Implement quality environmental documents



Guiding Principles

- Renewed emphasis

- AASHTO Practitioner's Handbook: Preparing High Quality NEPA Documents for Transportation Projects

- Examples of Effective Techniques for Improving the Quality of Environmental Documents

- www.environment.transportation.org



Guiding Principles

- A high-quality NEPA document¹
 - Is readily understandable by all audiences, including those without technical expertise.
 - Provides key information in an easy-to-navigate format.
 - Focuses on pertinent information and avoids unnecessary bulk.
 - Includes supporting technical information in appendices.
 - Meets all legal requirements.

¹Source: Center for Environmental Excellence by AASHTO (Ed.). (2014). Preparing High-Quality NEPA Documents for NEPA Transportation Projects. *AASHTO Practitioner's Handbook*, 15. Retrieved from <http://www.environment.transportation.org/pdf/programs/pg15-1.pdf>



Guiding Principles

- CEQ regulations support reader-friendly documents.
 - Reducing paperwork (1500.4)
 - Set appropriate page limits (1501.7(b)(1) and 1502.7)
 - Write in plain language (1502.8);
 - Emphasize areas that are useful to decision-makers and the public (1502.14 and 1502.15)
 - Incorporate information and data by reference (1502.21)



Guiding Principles

- “Improving the Quality of Environmental Documents” (AASHTO/ACEC committee in cooperation with FHWA)
 - Principle 1: Tell the story
 - Principle 2: Keep it brief
 - Principle 3: Meet all legal requirements



Principle 1

- Tell the story
 - Tell the story of the project so that the reader can easily understand the purpose and need for the project, how each alternative would meet the project goals, and the strengths and weaknesses associated with each alternative.



Tell the Story

Use every-day language

- Technical report text
 - New arterial roadway with signalized intersections
 - Four- to five-lane typical section with turn lanes at intersections
 - On new alignment
 - Depressed, grassy median
- DEIS text
 - Urban boulevard with traffic lights at intersections
 - Two westbound through-lanes and three eastbound through-lanes. Left- and right-turn lanes will also be added at many intersections.
 - Built where no roads exist now
 - Low, grassy median



Tell the Story

Explain key concepts and technical terms

- Use question and answer format
- Use simple text and graphics when possible
- Example: What is an EIS?



Tell the Story

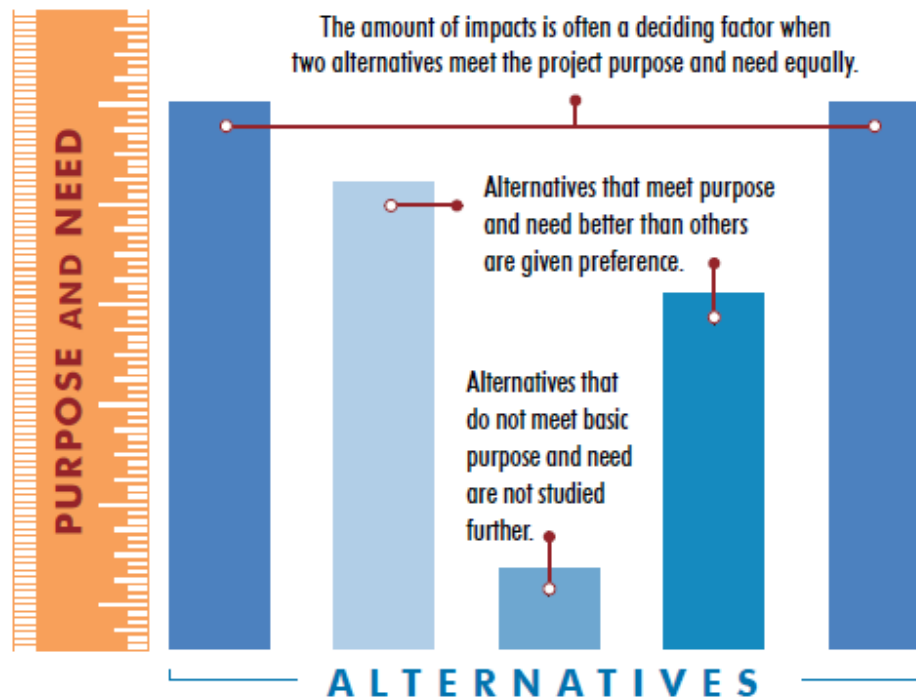
- Explain key terms and concepts
 - Purpose and need
 - Preferred alternative
 - Section 106 - Finding of effect
 - Section 4(f) – De minimis
 - MSATs
 - Etc.



Tell the Story

Explain key concepts

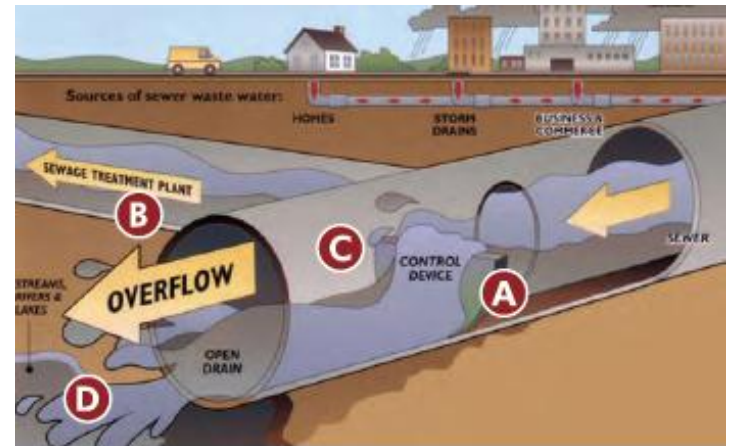
- Example: What is purpose and need?
 - “The purpose and need act as “measuring sticks” for the project alternatives . . .”



Tell the Story

Explain key concepts

- Example: How does a combined sewer system work?



OVERFLOW POLLUTION

- A)** Normal flows from combined sewers are diverted by control devices ...
- B)** ... into an interceptor drain and on to the sewage treatment plant.
- C)** Stormwater runoff can create excessive water flows that overwhelm the control device ...
- D)** ... allowing untreated waste water into streams and rivers.

Source: www.maysville-online.com/lifestyles/article_e23ec5b6-c034-11df-b87c-001cc4c002e0.html

Tell the Story

Edit, edit, edit

- Solid technical content
- Every-day language
- Opportunities to simplify
- Opportunities for graphics
- Consistency with other technical documents
- Good writing structure (active voice, consistent verb tense, etc.)
- Right skills in the project team

Opportunity Corridor Project
Draft Environmental Impact Statement
Chapter 3 - Alternatives
DRAFT - August 29, 2012

The major design features and potential impacts (positive and negative) of the **Recommended Preferred Alternative** ~~the major design features discussed in this chapter~~ are based on the preliminary engineering design completed up to now, and as the project moves toward final design and construction, the engineering design will be refined even more. The impacts described in this Draft EIS include both the amount of land needed to construct the project (temporary and permanent transportation right-of-way) needed for the new roadway (permanent right of way) and the land needed to build it (temporary right of way). These land areas are based on:

- The width and number of travel lanes, number of lanes on the Boulevard, and how wide they are
- The number of through and turning lanes on side streets, and how long and wide they are
- The locations and widths of sidewalks and bicycle and pedestrian paths
- The locations of roadway and railroad bridges and how high they are
- The infrastructure needed to manage roadway drainage
- The configuration of proposed intersections with other roadways, the locations and preliminary details of grade-separated crossings of existing roadways and railways, the location and widths of bicycle and pedestrian facilities, as well as the provisions necessary to properly handle roadway drainage.

3.2. How have the public and other interested agencies/organizations been involved in developing and evaluating/studying the alternatives?

Public involvement and agency coordination are an important part of the Opportunity Corridor project. As part ODOT's FDP, public and other stakeholder input must be considered before making a decision. **Full brief #1 summary here**

ODOT is working in close coordination with the Greater Cleveland Partnership (GCP) and the City of Cleveland as they work to develop and refine the future land use and economic development vision for southeast Cleveland, including the area within the Opportunity Corridor project study area.

As part of the ODOT FDP process, public involvement activities are held at strategic times to allow for public and project stakeholder input to be considered before making a decision.

As part of the planning and design of the Opportunity Corridor project, ODOT is using a context sensitive solutions (CSS) design process to **proactively engage** the study area residents and business owners to provide input into the Opportunity Corridor project design of the proposed roadway. The overall goal of the CSS process is to **design a transportation project that is consistent with community goals and values**:

- Understanding key issues and concerns,
- Involving stakeholders in the decision-making process early and frequently,
- Addressing all **multiple** modes of transportation
- Applying flexibility in design to address stakeholders' concerns whenever possible.

Comment [ANNG]: Consider whether it would be beneficial to add a summary paragraph of public involvement and stakeholder coordination to communicate the extent of opportunities for input and participation in the decision-making process.

Comment [JSH-22]: Yes. See comments below.

Comment [JSH-24]: Make this one of the things that has happened since the July meeting.



Tell the Story

Recent changes on two of these primary routes have reduced the capacity of the roads between the Interstates and University Circle. Carnegie Avenue once had six lanes that could be switched to provide four or five lanes in the rush hour direction and one or two lanes in the opposite direction, but the avenue was restriped in 2005 to have two fixed lanes in each direction and a center lane for left turns. This eliminated up to three lanes to and from University Circle. Two bus-only lanes were built on Euclid Avenue in 2008, reducing the lanes from four to two.

In addition, the street grid (Figure 2-2, page 2-2) is missing an east-west connection between Woodland and Union avenues, a distance of about two miles. As a result, north-south and diagonal roadways are not directly linked, and drivers must twist and turn their ways through the local streets to reach University Circle, creating a traffic bottleneck at the I-490-East 55th Street and East 55th Street-Woodland Avenue-Kinsman Road intersections. Drivers' other option to reach University Circle is to travel on I-90 or I-490, merge onto Cleveland's Innerbelt Freeway and travel through the central business district.

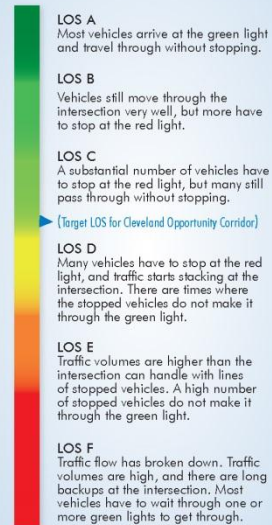
The Cleveland Opportunity Corridor project must provide improved access between I-77 and University Circle.

What is "mobility?"

Mobility is the easy movement of people and goods through an area. It is difficult for trucks to negotiate the roads between I-77 and University Circle. Rail lines used to move most of the goods in this area, so the streets were built mostly for cars. Today, the remaining industries are served mostly by trucks that have to use streets that were not built for them. Also, traffic to and from the houses, apartments, churches and stores in the area does not mix well with the heavy, industrial trucks.

The closest Interstate for travelers in the study area is I-490, and most, if not all, traffic

Figure 2-3: Levels of Service (LOS)



traveling in this area must pass through the I-490-East 55th Street intersection before spreading out to other roads or highways. As a result, 2005 and 2010 traffic counts show that this intersection operates at Level of Service F (Figure 2-3), meaning the traffic flow has broken down. Roadways with this poor level of service have more users than they can handle.

The Cleveland Opportunity Corridor project must provide improved mobility and better levels of service for traffic traveling to, from and within the area between I-77 and University Circle.



▲ Figure 4-30: The project would increase the turning area at the East 105th Street-Chester Avenue intersection, meeting current design standards and making it safer for pedestrians. (View looking east on Chester Avenue.)

to meet current design standards and improve safety for pedestrians (Figure 4-30).

In a letter dated Nov. 29, 2012, FHWA – with ODOT as its agent⁶ – determined that the temporary and permanent right of way required to build the Cleveland Opportunity Corridor project would not adversely affect the historic integrity of the Kenneth L. Johnson Recreation Center or the Wade Park Historic District. The project also would have “no adverse effect” on the 4th Church of Christian Scientists or Park Lane Villa, which are contributing elements of the Wade Park Historic District.

In addition, based on the amount of ground disturbance across the entire project area, no further archaeological investigations were recommended. Based on these findings, ODOT stated that a Section 106 determination of “no

adverse effect” is appropriate for the project. The OHPO concurred with this determination on Dec. 18, 2012.

As noted earlier, the proposed use of land within the Wade Park Historic District for permanent right of way is also regulated by Section 4(f). In its Nov. 29, 2012 letter, FHWA – with ODOT as its agent – notified the OHPO⁷ of the intent to apply a *de minimis* Section 4(f)

⁷ In accordance with 23 CFR Part 774.

A DE MINIMIS SECTION 4(F) FINDING IS A TYPE OF APPROVAL THAT CAN BE GIVEN WHEN THE IMPACTS TO A PROTECTED RESOURCE ARE MINOR. FOR HISTORIC SITES, THE PROJECT MUST HAVE “NO ADVERSE EFFECT” TO THE RESOURCE, AND THE OHPO MUST CONCUR WITH THIS FINDING.

⁶ In accordance with the Advisory Council on Historic Preservation's current regulations and 36 CFR § 800.5(b).

Principle 2

- Keep it brief
 - Keep the document as brief as possible, using clear, concise writing; an easy-to-use format; effective graphics and visual elements; and discussion of issues and impacts in proportion to their significance.



Keep it Brief

Simple sentences

- Use short, basic sentences vs. long, complex sentences
- Keep it tone neutral
- Eliminate unnecessary prepositions
 - Of the . . .
 - On the . . .
 - In the . . .
 - In order to . . .



Keep it Brief

Easy to use format

- Consider the audience
- Larger font
- High contrast colors
- Column format
- Limited oversize pages
- Layout with figures, tables and photographs
- Lower page count
 - Executive summary = 10 pages
 - Draft EIS main body = 79 pages
 - CEQ goal for Final EIS < 150 pages



Keep it Brief

Simple graphics

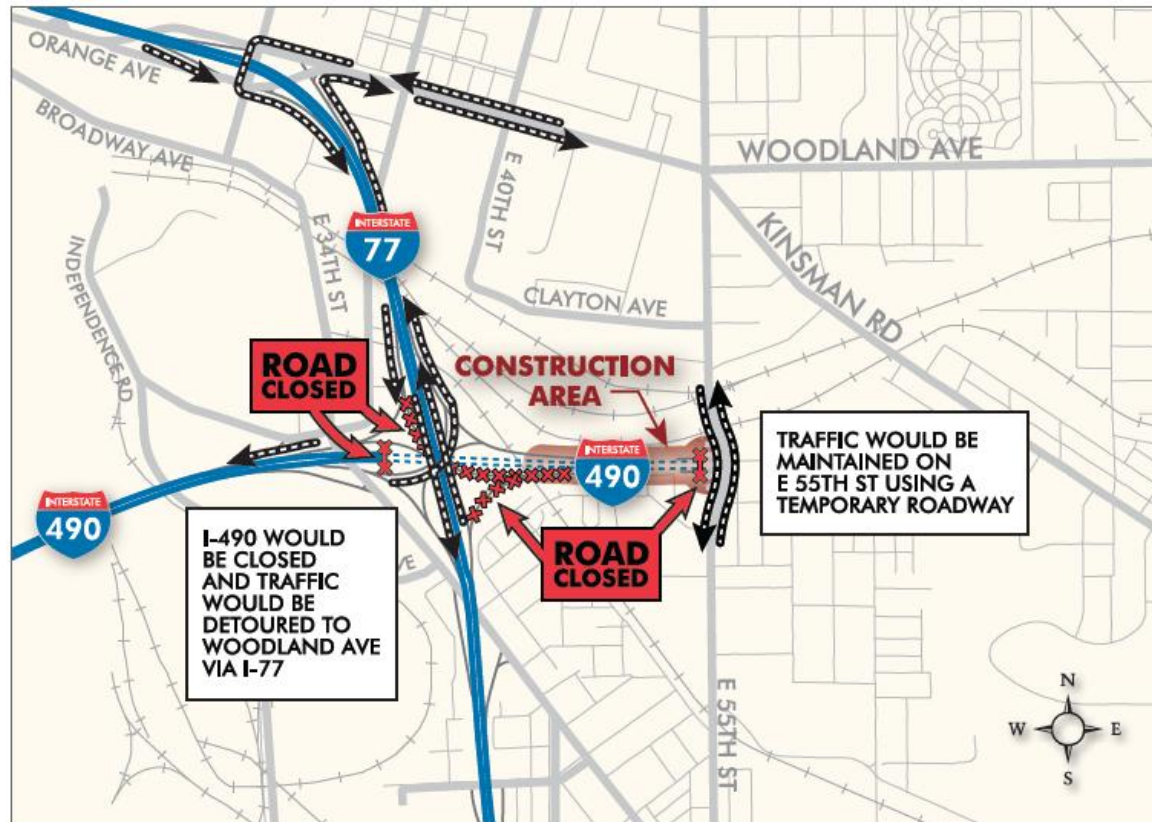
- Stick figures



Keep it Brief

Simple graphics

- Stick figures



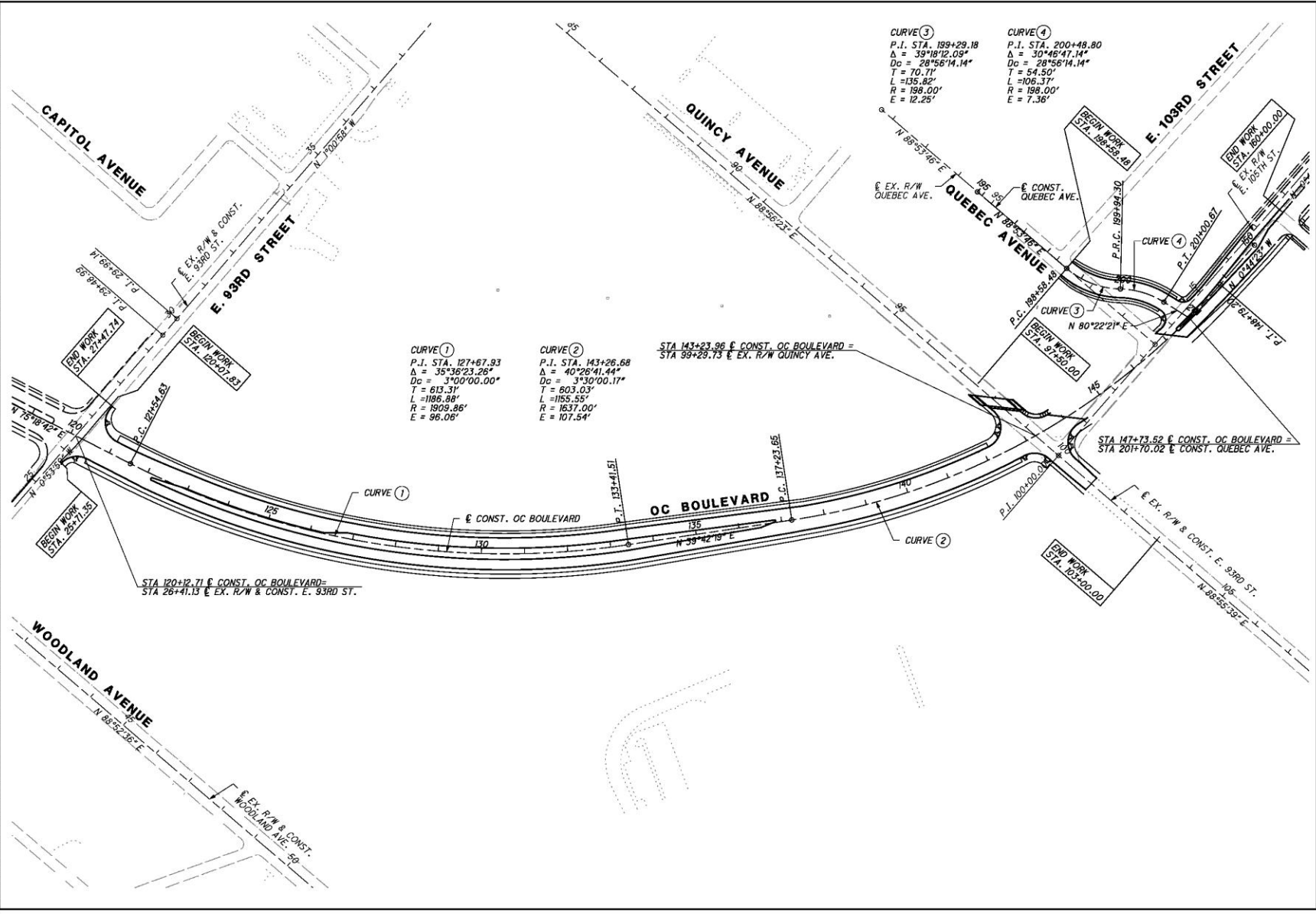
Keep it Brief

Simple graphics

- Show key resources, project impacts in one place
- Simplify legend and labeling
- Make it look more like a picture and less like a set of plans



p:\hmbw\256.fmb.org\p\WGreat_Lakes\Documents\Cleveland Projects\39853_Opportunity_Corridor\TECHPROJ\CUY\98695\Technical Information\CADD\98695\Roadway\Sheets\98695\GROU1.dgn 10/19/2014 4:01:27



DESIGNED BY	XX
CHECKED BY	XX
DATE	XX

SCHEMATIC PLAN
BEGIN TO STA. 160+00

CUY-10-20.98



Legend

Opportunity Corridor Alignment Preferred Alternative

- Pavement
- Bridge Deck
- Impacted Area
- Temporary Right-of-Way
- Permanent Right-of-Way
- Edge of Pavement

Study Area Structures

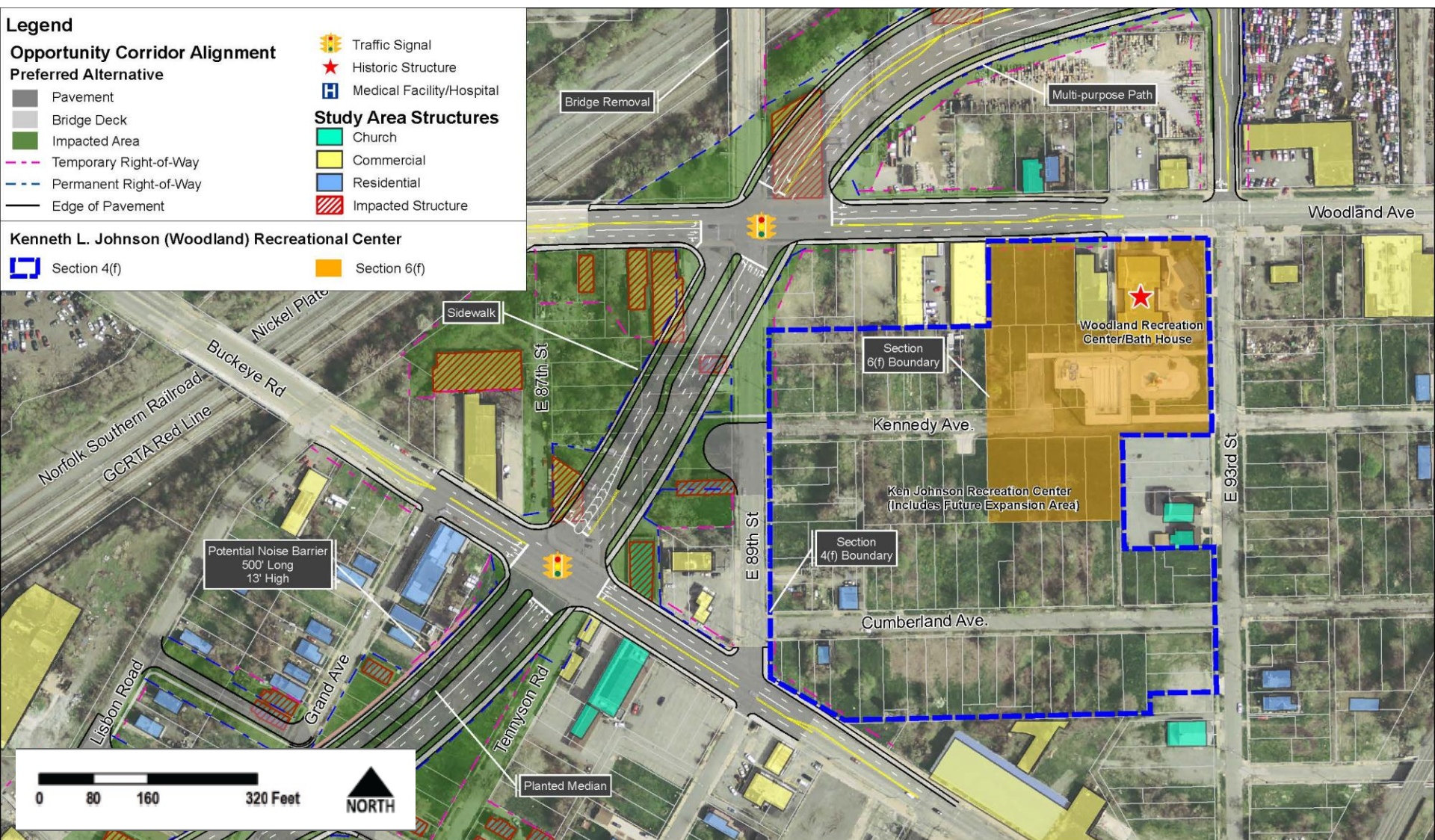
- Church
- Commercial
- Residential
- Impacted Structure

Kenneth L. Johnson (Woodland) Recreational Center

- Section 4(f)
- Section 6(f)

Other Symbols:

- Traffic Signal
- Historic Structure
- Medical Facility/Hospital



Keep it Brief

Amount of text = amount of impact

- Natural resources
 - ½ page
- Noise
 - 1 page
- Relocations
 - 1½ pages
- Environmental justice
 - 4 pages
- Public involvement
 - 10 pages



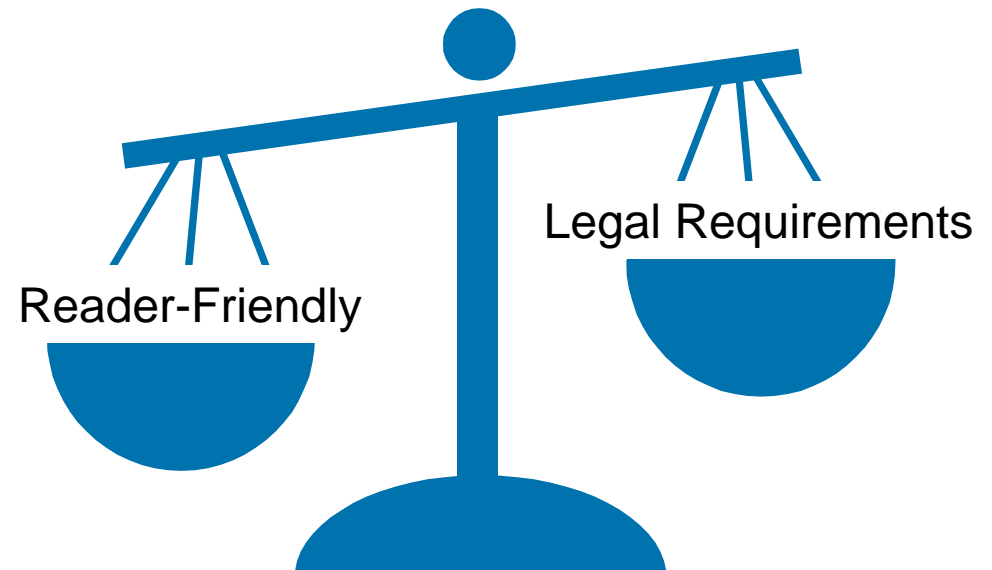
Principle 3

- Meet all legal requirements
 - Ensure that the document meets all legal requirements in a way that is easy to follow for regulators and technical reviewers.



Meet All Legal Requirements

- Collaboration
 - ODOT
 - FHWA
 - Other agencies



Meet all Legal Requirements



Figure 4-2: Chapter 4 Resources²

- OEPA Drinking Water Source Protection Areas and Public Water System Wells and Intakes Map, Cuyahoga County, Ohio (Ohio 2009, printed January 2013);
- Opportunity Corridor Environmental Site Assessment (ESA) Screening (November 2009);
- Level 2 Ecological Survey Report for Opportunity Corridor (PID 77333) (January 2010);
- Phase I History/Architecture Survey Report for the Opportunity Corridor Project (January 2010);
- Phase I Archaeological Literature Review, Prehistoric Context, and Archaeological Sensitivity Assessment for the Opportunity Corridor Project (February 2010);
- Phase I Environmental Site Assessment Opportunity Corridor Project Area (April 2011);
- Opportunity Corridor Operational Analysis Technical Memorandum (May 2012, revised June 2012);
- Opportunity Corridor Certified Traffic Plates (June 2012);
- Opportunity Corridor Indirect and Cumulative Effects Assessment Technical Memorandum (July 2012);
- Opportunity Corridor Relocation Assistance Program (RAP) Survey (September 2012);
- Opportunity Corridor CO Hot-Spot (Microscale) Analysis Report (November 2012);
- Opportunity Corridor Qualitative Mobile Source Air Toxics Analysis Report (November 2012);
- Phase I Archaeological Resource Review and Disturbance Assessment for the Proposed Opportunity Corridor Project (November 2012);
- Opportunity Corridor Noise Analysis Report (December 2012);
- Opportunity Corridor Stormwater Summary (December 2012); and
- Opportunity Corridor Environmental Justice Technical Memorandum (April 2013).

² These documents are incorporated by reference into this DEIS.

the study area does not include farmland or agricultural activity; however, it does include a number of neighborhoods and human resources such as homes, businesses, churches, schools, parks, recreation centers, historic properties, public transportation facilities, and other transportation features.

As noted in Chapter 3, the No-Build Alternative does not meet the purpose and need for the Cleveland Opportunity Corridor project. As a result, it was not recommended as a reasonable alternative. However, the No-Build Alternative is discussed throughout this chapter as a way to compare the impacts, benefits and costs of the preferred alternative.

WHAT DOES THE STUDY AREA LOOK LIKE?

The study area consists of a mix of residential, commercial, industrial and recreational land uses (Figure 4-3). In general, land use varies from parcel to parcel (Figure 4-4, page 4-3). For example, residential properties are located next to industrial properties. Mixing very different land uses very close to one another does not usually work well because the land owners have different goals and objectives. When this occurs, the land uses are called "incompatible." The Cleveland Opportunity Corridor study area is filled with incompatible land



▲ Figure 4-3: The study area consists of varying land uses including residential, commercial, industrial and recreational properties.



▲ Figure 4-30: The project would increase the turning area at the East 105th Street-Chester Avenue intersection, meeting current design standards and making it safer for pedestrians. (View looking east on Chester Avenue.)

to meet current design standards and improve safety for pedestrians (Figure 4-30).

In a letter dated Nov. 29, 2012, FHWA – with ODOT as its agent⁶ – determined that the temporary and permanent right of way required to build the Cleveland Opportunity Corridor project would not adversely affect the historic integrity of the Kenneth L. Johnson Recreation Center or the Wade Park Historic District. The project also would have "no adverse effect" on the 4th Church of Christian Scientists or Park Lane Villa, which are contributing elements of the Wade Park Historic District.

In addition, based on the amount of ground disturbance across the entire project area, no further archaeological investigations were recommended. Based on these findings, ODOT stated that a Section 106 determination of "no

⁶ In accordance with the Advisory Council on Historic Preservation's current regulations and 36 CFR § 800.5(b).

adverse effect" is appropriate for the project. The OHPO concurred with this determination on Dec. 18, 2012.

As noted earlier, the proposed use of land within the Wade Park Historic District for permanent right of way is also regulated by Section 4(f). In its Nov. 29, 2012 letter, FHWA – with ODOT as its agent – notified the OHPO⁷ of the intent to apply a *de minimis* Section 4(f)

⁷ In accordance with 23 CFR Part 774.

A DE MINIMIS SECTION 4(F) FINDING IS A TYPE OF APPROVAL THAT CAN BE GIVEN WHEN THE IMPACTS TO A PROTECTED RESOURCE ARE MINOR. FOR HISTORIC SITES, THE PROJECT MUST HAVE "NO ADVERSE EFFECT" TO THE RESOURCE, AND THE OHPO MUST CONCUR WITH THIS FINDING.

Lessons Learned

- Assemble an internal team with the right mix of skills
 - Technical expertise
 - Project knowledge
 - Writing
 - Editing
 - Graphic design
- Communicate often with the external project team
 - Detailed outline
 - Preliminary drafts
 - Specific graphics/tables



Lessons Learned

- Requires careful planning
- Collaborative process
- Iterative process
- Requires time

4.0 Environmental Resources, Impacts, and Mitigation

- 4.1. What is the purpose of this chapter?
- 4.2. What resources are not present within the study area?
 - Wetlands
 - Streams
 - [Other surface waters \(reservoirs, lakes, detention basins, farm ponds\)](#)
 - Floodplains
 - [Unique or high quality terrestrial habitat](#)
 - Threatened and endangered species
 - Drinking water resources
 - Farmland
 - [Natural & Wildlife & Waterfowl Refuges](#)
- 4.3. What topics are discussed in detail in this chapter?
- 4.4. What is the general land use, and what community features are in the study area?
- 4.5. [Would the project be compatible with planned developments and local land use plans?](#)
- 4.6. [How much land would be needed to construct the project?](#)
- 4.7. [Would any homes, businesses, or churches be relocated?](#)
- 4.8. [What types of utilities will be affected?](#)
- 4.7. [How would community cohesion be affected?](#)
- 4.8. [How would access to neighborhoods be changed?](#)
- 4.9. [How would existing roads be changed?](#)
- 4.10. [How would access to neighborhoods be changed?](#)
- 4.11. [How would existing roads be changed?](#)
- 4-11-4.12. [What would be done to keep traffic and people moving during construction?](#)
- 4-11-4.13. [How would construction activities of the project affect the surrounding community?](#)
- 4-11-4.13. [Would the project be compatible with planned developments and local land use plans?](#)
- 4-11-4.14. [How would parks and recreational opportunities be affected?](#)
- 4-11-4.15. [Would community services be affected?](#)
- 4-11-4.16. [How would local businesses be affected?](#)
- 4-11-4.17. [How would bicycles and pedestrians be affected?](#)
- 4-11-4.18. [Would concentrations of low-income and minority populations suffer disproportionately high and adverse health and human impacts?](#)
- 4-22-4.15. [How would water quality be affected?](#)
- 4-22-4.16. [How would historic resources be affected?](#)
- 4-22-4.17. [How would archaeological resources be affected?](#)
- 4-22-4.18. [How would parks and recreational opportunities be affected?](#)
- 4-22-4.19. [What is 4\(f\), and how does it apply to this project?](#)

Comment [3511]: Maybe combine?

Lessons Learned

- Use appropriate software
 - Publishing software
 - Graphics software
 - GIS
- Build adequate time into the schedule
 - Iterative process
 - Additional time for editing, layout and graphics
- Flexibility/Adaptation
- Champion the reader-friendly approach



Project Status and Highlights

- DEIS signed August 2013
- Combined FEIS/ROD signed May 2014
- Environmental Commitments/Mitigation Measures
 - Bike/Ped bridges
 - Voluntary Relocation Assistance Program
 - Planning expansion of community recreational center
 - Enhanced bus shelters
 - East 105th Street transit station
 - On-the-Job training



Project Status and Highlights



Project Status and Highlights

- Steering Committee
 - 35 members
 - Public agencies
 - Private companies
 - Not for profits
 - Residents
 - Role
 - Workforce development
 - Jobs (outreach and training)
 - Community engagement
 - Design, planning and zoning
 - Site assembly and interim use



References

- Center for Environmental Excellence by AASHTO (Ed.). (2014). Preparing High-Quality NEPA Documents for NEPA Transportation Projects. *AASHTO Practitioner's Handbook*, 15. Retrieved from <http://www.environment.transportation.org/pdf/programs/pg15-1.pdf>
- Washington State Department of Transportation (n.d.). *WSDOT's New EIS Approach: The Making of the Alaskan Way Viaduct and Seawall Replacement EIS* [PowerPoint slides]. <http://design.transportation.org/Documents/AASHTO-ACEC-FHWA,WA,EISApproach.pdf>
- Project Website
www.OpportunityCorridor.transportation.ohio.gov





Cleveland Opportunity Corridor Project

Reader-Friendly Environmental Impact Statement

Purdue Road School

March 10, 2015

