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

17' MINIMUM CLEARANCE

12' SHOULDER
12' LANE
12' LANE
12' LANE
12' LANE
12' LANE
12' SHOULDER

STREET TREES

RETAINING WALL WITH FORM LINER SURFACE AND COLORED SURFACE SEALER

EXAMPLE OF BRIDGE WITH ENHANCED FENCES AND ABUTMENTS

Source: Draft EIS (August 2013)
Preferred Alternative

TYPICAL BOULEVARD SIGNALIZED INTERSECTION (CROSS-SECTION)
LOOKING EAST

ROADWAY AND PEDESTRIAN LIGHTING
STREET TREES
MEDIAN WITH STORMWATER TREATMENT
MAST ARM TRAFFIC SIGNAL

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

<table>
<thead>
<tr>
<th>Category</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent Land – Acres (City Owned)</td>
<td>46.9 (10.2)</td>
</tr>
<tr>
<td>Potential Regulated Material Sites</td>
<td>42</td>
</tr>
<tr>
<td>Historic Sites</td>
<td>1</td>
</tr>
<tr>
<td>Park and Recreation Sites</td>
<td>1</td>
</tr>
<tr>
<td>Residential Structures (Relocations)</td>
<td>64 (76)</td>
</tr>
<tr>
<td>Church Displacements</td>
<td>1</td>
</tr>
<tr>
<td>Commercial Business Structures (Relocations)</td>
<td>25 (16)</td>
</tr>
</tbody>
</table>

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.

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.transporation.org
Guiding Principles

• A high-quality NEPA document
  
  − 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.

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?

Diagram:
- Early Planning
- Alternatives Development & Environmental Studies (NOI)
- WE ARE HERE
- DEIS
- FEIS
- ROD

For the Cleveland Opportunity Corridor project, the FEIS and the ROD may be completed at the same time.
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-c094-11df-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
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-490 or I-90, merge onto Cleveland’s Innerbelt Freeway and travel through the central business district.

The Cleveland Opportunity Corridor project must provide improved access between 1-77 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 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, 2009 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 2-3: Levels of Service (LOS)

LOS A: Most vehicles arrive at the green light and travel through without stopping.

LOS B: Vehicles still move through the intersection very well, but more have to stop at the red light.

LOS C: A substantial number of vehicles have to stop at the red light, but many still pass through without stopping.

LOS D: Many vehicles have to stop at the red light, and traffic starts backing up at the intersection. There are times where the stopped vehicles do not make it through the green light.

LOS E: Traffic volumes are higher than the intersection can handle with lines of stopped vehicles. A high number of stopped vehicles do not make it through the green light.

LOS F: Traffic flow has broken down. Traffic volumes are high, and there are long backups at the intersection. Most vehicles have to wait through one or more green lights to get through.

Figure 4-3: The project would increase the turning area at the East 195th 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 agent¹ — 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 OHPO of the intent to apply a de minimis Section 4(f).

¹ 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.
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.
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
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
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

![Balance Scale Diagram with "Reader-Friendly" and "Legal Requirements" on the scales]
Meet all Legal Requirements

Figure 4-2: Chapter 4 Resources

- OHPA Dividing 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 (EIA) Screening (November 2009);
- Level 2 Ecological Survey Report for Opportunity Corridor (PDO 77335) (January 2018);
- Phase I History/Archaeological Survey Report for the Opportunity Corridor Project (January 2010);
- Phase I Archaeological Resources Review, Paleohistoric Context, and Archeological 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 Flows March (May 2013);
- Opportunity Corridor Independent 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);

Figure 4-3: The project would increase the turning area at the East 195th Street-Chester Avenue intersection, meeting current design standards and making it safer for pedestrians. (View looking east on Chester Avenue)

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

### 4.6 Environmental Resources, Impacts, and Mitigation

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1. What is the purpose of this chapter?</td>
<td></td>
</tr>
<tr>
<td>4.2. What resources are not present within the study area?</td>
<td>Wetlands</td>
</tr>
<tr>
<td></td>
<td>- Streams</td>
</tr>
<tr>
<td></td>
<td>- Other surface waters (reservoirs, lakes, detention basins, farm ponds)</td>
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<tr>
<td></td>
<td>- Floodplains</td>
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<tr>
<td></td>
<td>- Unique or high quality terrestrial habitat</td>
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<td></td>
<td>- Threatened and endangered species</td>
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<tr>
<td></td>
<td>- Drinking water resources</td>
</tr>
<tr>
<td></td>
<td>- Farmland</td>
</tr>
<tr>
<td></td>
<td>- Natural &amp; Wildlife &amp; Watershed Refuges</td>
</tr>
<tr>
<td>4.3. What topics are discussed in detail in this chapter?</td>
<td></td>
</tr>
<tr>
<td>4.4. What are the general land use, and what community features are in the study area?</td>
<td></td>
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<tr>
<td>4.5. How would the project be compatible with planned developments and local land use plans?</td>
<td></td>
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<tr>
<td>4.6. How much land would be needed to construct the project?</td>
<td></td>
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<tr>
<td>4.7. Would any homes, businesses, or facilities be relocated?</td>
<td></td>
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<td>4.8. What types of utilities will be affected?</td>
<td></td>
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<td>4.9. How would community cohesion be affected?</td>
<td></td>
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<td>4.10. How would social services be affected?</td>
<td></td>
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<tr>
<td>4.11. How would existing roads be changed?</td>
<td></td>
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<tr>
<td>4.12. What would be done to keep traffic and people moving during construction?</td>
<td></td>
</tr>
<tr>
<td>4.13. How would construction activities affect the surrounding community?</td>
<td></td>
</tr>
<tr>
<td>4.14. Would the project be compatible with planned developments and local land use plans?</td>
<td></td>
</tr>
<tr>
<td>4.15. How would parks and recreational opportunities be affected?</td>
<td></td>
</tr>
<tr>
<td>4.16. How would community services be affected?</td>
<td></td>
</tr>
<tr>
<td>4.17. How would local businesses be affected?</td>
<td></td>
</tr>
<tr>
<td>4.18. How would bicyclists and pedestrians be affected?</td>
<td></td>
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<tr>
<td>4.19. How would concentrations of low-income and minority populations suffer disproportionately high and variable health and income impacts?</td>
<td></td>
</tr>
<tr>
<td>4.20. How would water quality be affected?</td>
<td></td>
</tr>
<tr>
<td>4.21. How would farmland resources be affected?</td>
<td></td>
</tr>
<tr>
<td>4.22. How would historical resources be affected?</td>
<td></td>
</tr>
<tr>
<td>4.23. How would parks and recreational opportunities be affected?</td>
<td></td>
</tr>
<tr>
<td>4.24. What is the project, and how does it apply to this project?</td>
<td></td>
</tr>
</tbody>
</table>
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

- **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


• Project Website
  [www.OpportunityCorridor.transportation.ohio.gov](http://www.OpportunityCorridor.transportation.ohio.gov)
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