



Todd Alexander
<c.todd.alexander@gmail.com>

04/21/2009 11:49 PM

To craig.hebebrand@dot.state.oh.us
cc
bcc
Subject Innerbelt

Hello,

I just wanted to send a quick comment with regards to the Ohio Department of Transportation's plans to renovate Cleveland's innerbelt. I believe that the innerbelt is an important aspect of the future vibrancy of downtown Cleveland, and that the project should incorporate design features that encourage people to move back to Cleveland. In my mind this would include features that make bike usage / pedestrian traffic simple, as well as a more holistic approach that promotes growth within the city.

As a resident of Northeast Ohio I feel that any plans to redesign the innerbelt should be moved forward only after consulting a larger number of stakeholders.

Thank you for your time.

Sincerely,

Todd Alexander

1
2
3



WILLIAM E. ALFONSI
INTERIOR DESIGN CONSULTANT
Cell: 269-929-1236
P.O. Box 415, Jamestown, PA 16134

April 22, 2009

Greg Hebebrand
Department of Transportation
District 12 5500
Transportation Blvd.
Garfield Heights, Ohio 44125

Dear Greg:

The new Bridge a New Renaissance for Cleveland just maybe the REKINDLE OF CLEVELANDS NATIONAL! PRESENCE!

The Cleveland "Memorial Bridge" I know there is history from when it started on the Cuyahoga River to present. I have a concept the entire bridge should show that history with BRONZE PLAQUES AND MAYBE SOME STATUARY. Lighting to give it the Drama and today, with going green it could be lighted with minim lighting cost. I am a reader of everything new. I am sure with the brilliant engineers today the possibility of making it a New Cleveland Statement would be worth the study and research.

I am sure there are people who can do research that I am not capable of at 86 I am POSITIVE WE CAN CREATE QUITE AN IMPRESSIVE LIST!

Mine are very small: Severance, Bob Feller, Vernon Stouffer, and Cyrus Eaton. Grover Cleveland, Original Indian Reservations on the rivers, the Collage could be created by local Art Students as a contest? Rewards being not only recognition but some free Class hours. A show of the contestant's presentations at the Cleveland Art Museum Maybe the ball park MY CONCEPT THE GREATER THE SHOW, THE GREATER THE WORK ON PRESENTATION THE GREATER; THE VALUE, OF THE TOTAL PROJECT. We COULD EVEN HAVE A STATE CLEVELAND WEEK END: CLEVELANDS NEW RENASSIANCE FAIR WITH ALL OF WHAT IS GONG TO HAPPEN BILL BOARDS., PRESENTATIONS OF OPORTUNITES. OPEN HOUSES, AT ALL ATTRACTIONS. I HAVE HAD SEVERAL THOUGHTS OF THE CLEVEALND TRUST BUILDING AT CORNER OF 9TH AND EUCLID TO BE A MONEY MUSIEUM WITH PRESSES THAT ARE OUT OF DATE AND THE HSITORY OF AMERICAN MONEY. . PRINT IT SELL IT; THERE?

MY IDEAS ARE A SMALL CONCEPT OF WHAT COULD BE HERE WE ARE IN THE BEGINNING OF THE 21ST CENTURY AND IT COULD VERY WELL BE OUR NEW "RENNASSIANCE"!!

Who am I started in the field of Interior Design at "Carey W. Sims" in Shaker Heights in 1945 as an Apprentice:

Over HALF a Century. National Reputation

Residential Restoration • New Family Environments • Custom Drapery
Blinds • Wall Coverings • Carpet, Furniture Accessories

WA

WILLIAM E. ALFONSI

INTERIOR DESIGN CONSULTANT

Cell: 269-929-1236

P.O. Box 415, Jamestown, PA 16134

Studied in Paris After WW2 and Miami in Oxford, Ohio. And other education. At that time there was little to be learned and few places one could afford. I was found my Mr. Mastick from; Mastick's Design Studio at corner of Carnegie and did some Design Projects for Stouffers Restaurants. I have become nationally known in Funeral Home Design and Consultation, Residential Design and Restoration. I am amazing at 86 and still have projects in work.

I would like to comment on the city of Cleveland for it is sad we are not in a more IMPRESSIVE POSITION; IN THE CITIES OF AMERICA. CLEVELAND HAS MORE WEALTH OF ANEMITIES THAT MOST.! A FINE LAKE SHORE WITH; ALMOST, NO ATTRACTIONS. ONE OF THE FINESTS SYMPHONEY'S IN THE WORLD; SEVERENCE HALL; AN AWSOME REPRETORE OF MUSIEUMS ART GALLERIES, THE RENOWN CLEVELAND ART GALLERY, THE ZOO, PLANITARIUM, RAIN FOREST, THE MANY ATTRATIONS I HAVAE NOT LISTED AND CAN NOT REMEMBER. ONE OF THE FINEST HOSPITOLS IN THE WORLD! WORLD CLASS UNIVERSITIES, HIGHER EDUCATION CENTERS, FOOTBALL AND BASEBALL PARKS. I HAVE TRAVELED TO INDIANAPOILIS FOR OVER 50 YEARS. THEIR DOWN TOWN IS AWSOME AND THEY DO NOT HAVE ONE TENTH OF WHAT WE HAVE IN CLEVELAND.

CLEVELAND NEEDS A COMPLETE RENOVATION AND STUDY FOR THE 21ST CENTURY! SOME HOW! ITS LOST ITS "SPIRIT OF COMPETITION" AT ONE TIME WITH" HALLE,HIGBEE, MAY COMPAY, "THE STATLER" THE CLEVELAND HOTEL,OAK ROOM ,AAAAAHH:"PEACOCKS" THE THEATRE AREA AT 9TH The River could have housing,

We have a great air port. WE HAVE IT ALL.. WE NEED A WHOLE NEW "COMMITTEE OF STUDY FOR CLEVELAND "WITH THE NEW Government Programs to get the ECONOMY GOINING AGAIN. LETS HAVE CLEVELAND BE PART OF IT.AGREAT OPPORTUNITY. FOR THE YOUNG, TO CREATE, MANAGE, AND PROVE THEIR DREAMS AND SKILLS. CLEVELAND IS ABSOLUTELY A PLATIMUN MINE OF OPPORTUNITY! Saying golden is not good enough when you have the best there is. LET'S GO FOR IT! HONEST WE DO HAVE IT ALL! LETS LITE THE FIRE OF OUR GREATNESS!

Kindly excuse my grammar and punctuation. You may alter this presentation so it may say it much better than I have. At 86 MY COMPUTER SKILLS ARE IN PRE SCHOOL AND MY MID IS RUNNING FASTER THAN MY FINGERS. I am much better at speaking than writing. My IT IS SO AMAZING TO BE 86 IN NUMBERS ONLY AND HAVE 50 YEAR OLD MIND AND PERCPECTIVE TO DREAM! FOR OUR NATIONS FUTURE! I WOULD CONSIDER IT AN HONOR TO BE PART OF THIS PROJECT AS A CRITIC AND MENTOR.

Yours respectfully

William E. Alfonsi

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WA

WILLIAM E. ALFONSI

INTERIOR DESIGN CONSULTANT

Cell: 269-929-1236

P.O. Box 415, Jamestown, PA 16134

Just so you know I sent a copy to THE

April 22, 2009

P.D
Bos

The Plain Dealer Plaza
1801 Superior Ave.
Cleveland, Aave.

President and Publisher
Terrance C.Z. Egger

Dear Sir:

I have written a letter to Greg Heberand, Department of Transportation in reference to the new bridge.

I have great hopes it will be impressive enough for your paper to print the article.

I have had a great interest in the city my career started there. I have had very little

Very little contact with news papers in my 86 years of life so: There could be the

Fact, my protocol is in correct if that is the fact I APOLIGIZE TO THOSE WHO I

MAY, HAVE OFFENDED.

Your s respectfully

William E. Alfonsi

Over HALF a Century National Reputation

Residential Restoration • New Family Environments • Custom Drapery
Blinds • Wall Coverings • Carpet, Furniture Accessories



SPWebmaster@dot.state.oh.us
S
05/21/2009 04:54 PM

To Craig.Hebebrand@dot.state.oh.us
cc
bcc

Subject Innerbelt Plan Public Comment Form

Comments: As a participant in the Innerbelt Project process from it's inception, I have observed the decision-making and the technical work which has resulted in the preferred alternative which is the the subject of the Innerbelt Draft Environmental Impact Study (DEIS). My PERSONAL views as a citizen of Cuyahoga County are that there are substantive deficiencies and questions regarding the Project development process and the Project recommendations. These are fully detailed in a separate public comment sent via US mail are are incorporated herein. I request these comments and questions be incorporated in the official public comment record and receive a complete response.

Name:: Paul Alsenas

Street: 8384 Settlers Passage

City: Brecksville

State: OH

Zip Code: 44141

Email:: palsenas@aol.com

why are you proposing to
re Direct the traffic
to have exits. why not
build Express lanes for
people that bypass Cleveland if
Preferred.

Anonymous #1

1
Please do NOT close down
access to Downtown Cleveland
We need to keep as many exits
as possible to keep Cleveland economically
robust and competitive,
2
a Southern alternative is highly
preferable.

Cleveland Innerbelt Plan Public Hearing
PUBLIC COMMENT FORM
April 21, 2009



Copies of today's presentation and this form will be available on the Project website.
Visit www.innerbelt.org and select the "Innerbelt Plan" logo.

1. What are your comments regarding the Cleveland Innerbelt Plan as proposed?

Please pave, repair and fix
the sidewalks and empty lots
all along West 15th Street between
Kenilworth & Auburn Ave.
It's ONLY been 50 years
that this UNPAVED EYESORE
has been left UNATTENDED TO
By ODOT since the DAY they
TORE the houses down to build
(that my father and brothers & family
witnessed first hand.)

2. To help us document comments and forward future Project information, please provide:

Name _____
Address _____
City _____ State _____ Zip Code _____
Telephone Number _____
Email Address _____

Complete this form and return to ODOT by 5 p.m. on May 21, 2009 for consideration in the Final Environmental Impact Study.

Mail or fax to:
Ohio Department of Transportation, District 12
ATTN: Craig Hebebrand
5500 Transportation Blvd.
Garfield Heights, OH 44116
Fax: 216-584-2279

Or complete this form on the Internet at:
www.innerbelt.org and select the
"Innerbelt Plan" logo.

Anonymous #2

Anonymous #3

The Innerbelt. OUR House and
ALL my neighbors Along this
Street Put up with ENOUGH
Noise, dirt, Mud and Vibration
From these Lots and the Free-
Way itself ALready.
Isn't it time to
PAVE these Lots?
How many times do we
have to request this?



SPWebmaster@dot.state.oh.u
s
04/21/2009 10:37 AM

To Craig.Hebebrand@dot.state.oh.us
cc
bcc
Subject Innerbelt Plan Public Comment Form

Comments: Whatever design is chosen, please don't obstruct the view of the water and landscape from motorists. Without any mountains nearby, there are only a few expansive views motorists can enjoy -- and this is one of them. Cleveland's water views are a true value to the city, and they shouldn't be obfuscated by concrete walls or barely see-through screens. It would be a missed opportunity otherwise. From a psychological perspective, a bridge with a view presents an inviting, expansive city, whereas an enclosed, viewless bridge presents a city that is insular and antiquated. Choose a view! Thanks for listening. I'm a former Northeast Ohio resident, but travel to Cleveland often.

Anonymous #4



SPWebmaster@dot.state.oh.us
 s
 04/21/2009 10:35 AM

To Craig.Hebebrand@dot.state.oh.us
 cc
 bcc
 Subject Innerbelt Plan Public Comment Form

Comments: When will ODOT clean up all the trees and undergrowth along I-71 leading up to the innerbelt bridge? There's garbage and trees and all kinds of overgrown mess along this stretch.

City: cleveland

State: ohio

Zip Code: 44113

Cleveland Innerbelt Plan Public Hearing



Public Comment Form

April 21, 2009

1. What are your comments regarding the Cleveland Innerbelt Plan as proposed?

My name is Fred L. Backus and I am the owner of the building located at 2150 West 15th Street Cleveland, Ohio (parcel # 700-A WL). This building has been slated to be razed for the new Innerbelt Plan project. My business T.I.G. Welding Specialties, Inc. has been located in this building for over 35 years.

However, when ODOT sent people over to appraise my building, their conclusions were nothing short of unbelievable to me.

The appraisal stated that the value of the land was greater without my building, therefore my building was worth \$0.00. And since my building is located on land owned by Scranton - Averell Inc., all money paid by ODOT would go to the land owner and nothing to the building owner.

I find it hard to believe that ODOT would treat a 45 year business this way. The building was very well maintained with a 25 year roof and structural steel supports on all main pillars and most ceiling joists (see enclosed photos). I also have a 5-year land lease with Scranton - Averell and did not wish to move.

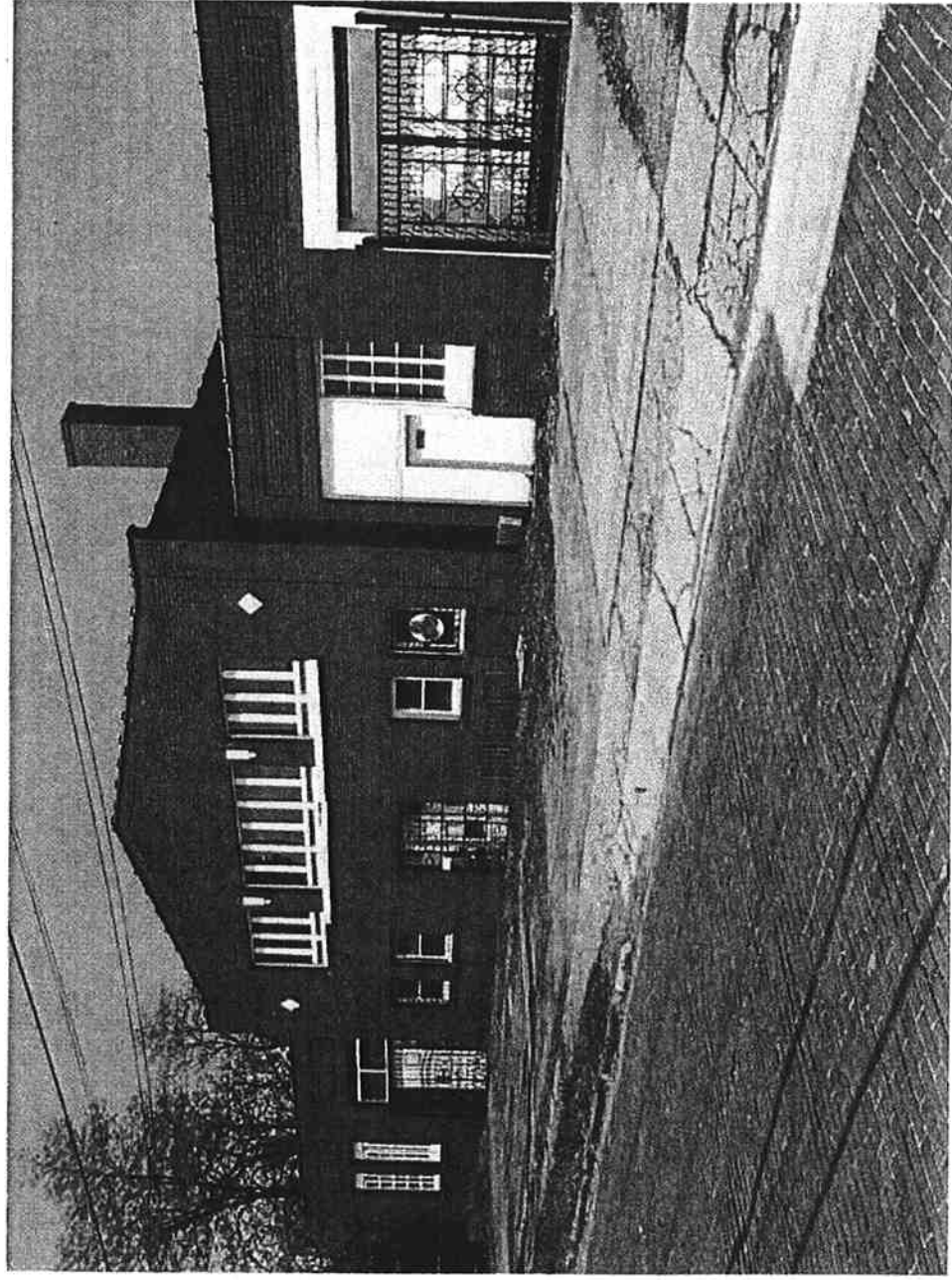
With zero money to acquire or even put a down payment on a comparable building, my company will be out of business and my seven employees jobless. I know my business will have to be moved soon, so I would like to resolve this as soon as possible. But with an offer of \$0.00 I would have no choice but to wait until the court decides how much my building is worth.

To be fair to ODOT, you have committed to a new appraisal of my building and will pay all moving expenses to a new building. I can only hope a new method is used in this appraisal that will be fair to the building owner and not just the land owner.

2. To help us document comments and forward future Project information, please provide:

Name: Fred L. Backus
 Address: 2150 West 15th Street
 City: Cleveland State: Ohio Zip Code: 44113
 Telephone Number: 216 621-1763 Fax Number: 216 621-6417
 Email Address: ant.sweet@yahoo.com

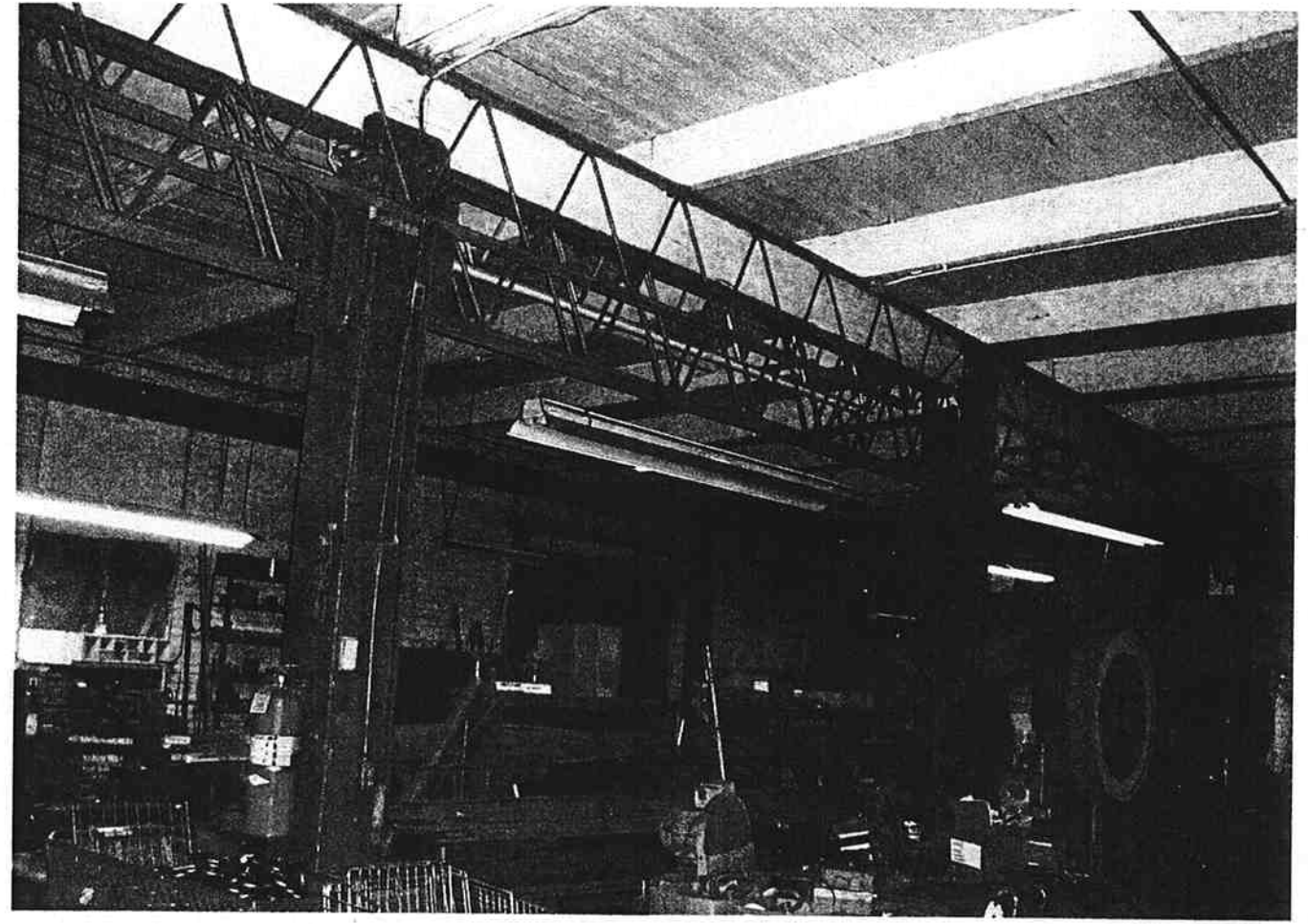
Anonymous #5



TIG WELDING SPECIALTIES, INC.
2150 West 15th Street
CLEVELAND, OHIO 44113

Alltel has no control over, and is not responsible for, the content or use of this picture or the accompanying personal message

<http://us.m02.mail.yahoo.com/dc/launch?.rand=97nfc40s5vst>



TIG WELDING SPECIALTIES, INC.
2150 West 15th Street
CLEVELAND, OHIO 44113



"Jamie Baker"
<JBaker@stclairsuperior.org>
03/20/2009 10:35 AM

To <Craig.Hebebrand@dot.state.oh.us>
cc "Greg Peckham" <gpeckham@clevelandpublicart.org>, <alenkabanco@sbcglobal.net>
bcc
Subject RE: Cleveland Urban Core Projects - April 2, 2009 Meeting Notice

Hi Craig - we are working on a public art project for Kirtland Park. During our deliberations yesterday, someone brought up the park being used as an innerbelt construction staging area. Do you know the timing of this? We are trying to determine if it is necessary to scrap / or put on hold the public art project.
-Jamie

From: Craig.Hebebrand@dot.state.oh.us [mailto:Craig.Hebebrand@dot.state.oh.us]
Sent: Fri 3/20/2009 10:16 AM
Subject: Cleveland Urban Core Projects - April 2, 2009 Meeting Notice

Dear Stakeholder:

The Ohio Department of Transportation (ODOT) invites you to attend the Cleveland Urban Core Projects Advisory Committee Meeting on Thursday, April 2, 2009 from 9:00 AM to 11:30 AM at the offices of the Northeast Ohio Areawide Coordinating Agency, 1299 Superior Avenue, Cleveland, Ohio. The purpose of this meeting will be to provide an update on the status of the Cleveland Innerbelt Project.

Please be advised that the Draft Environmental Impact Statement (DEIS) was approved by the Federal Highway Administration on March 2, 2009 and that ODOT will hold a Public Hearing on Tuesday, April 21, 2009 from 4:00 PM to 8:00 PM at Annunciation Greek Orthodox Church, 2187 West 14th Street, Cleveland, Ohio. The DEIS Public Comment period will close at 5:00 PM on May 21, 2009.

Please visit the Cleveland Innerbelt Project Website at www.innerbelt.org for more information. If you have questions regarding the above referenced meeting, please do not hesitate to ask.

Respectfully,

Craig K. Hebebrand, P.E.

Ohio Department of Transportation, District 12
5500 Transportation Boulevard, Garfield Heights, Ohio 44125



Craig
Hebebrand/Production/D12/O
DOT
03/20/2009 12:04 PM

To "Jamie Baker" <JBaker@stclairsuperior.org>
cc alenkabanco@sbcglobal.net, "Greg Peckham" <gpeckham@clevelandpublicart.org>
bcc
Subject RE: Cleveland Urban Core Projects - April 2, 2009 Meeting Notice

Jamie,

There is no temporary or permanent work in Kirtland Park. Kirtland Park is not being considered for use as a construction staging area. Please proceed with your efforts. Good Luck!

Respectfully,

Craig K. Hebebrand, P.E.

Ohio Department of Transportation, District 12
5500 Transportation Boulevard, Garfield Heights, Ohio 44125

Telephone: (216) 584-2113; Facsimile: (216) 584-3508

E-Mail: craig.hebebrand@dot.state.oh.us

"Jamie Baker" <JBaker@stclairsuperior.org>



"Jamie Baker"
<JBaker@stclairsuperior.org>
03/20/2009 10:35 AM

To <Craig.Hebebrand@dot.state.oh.us>
cc "Greg Peckham" <gpeckham@clevelandpublicart.org>, <alenkabanco@sbcglobal.net>
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-Jamie

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Sent: Fri 3/20/2009 10:16 AM
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Respectfully,

Craig K. Hebebrand, P.E.

Ohio Department of Transportation, District 12
5500 Transportation Boulevard, Garfield Heights, Ohio 44125

Telephone: (216) 584-2113; Facsimile: (216) 584-3508

E-Mail: craig.hebebrand@dot.state.oh.us



May 18, 2009

Craig Hebebrand
ODOT District 12
5500 Transportation Blvd.
Garfield Heights, OH 44125

RE: Comments of David Beach on Draft Environmental Impact Statement, Cleveland Innerbelt

Dear Craig:

Please accept these comments for the Draft Environmental Impact Statement (DEIS) for the Cleveland Innerbelt project. I submit these comments as someone who has been involved in the Innerbelt planning since the beginning as a member of the Scoping Committee. I also live and work in the City of Cleveland and will be affected personally by the Innerbelt project.

My comments address the following issues:

- Deficiencies in the project purpose and need 1
- Failure to consider transportation demand-management solutions 2
- Failure to address stormwater pollution and water quality 3
- Failure to implement a complete-streets solution that includes bicycles 4

Each of these issues is explained in detail below. Most were included in my previous comments dated February 23, 2007 (see Attachment A). Thus, I am still expecting that ODOT and FHWA will address these critical issues in a timely manner, as is required by the NEPA process. This is the biggest infrastructure project in Cleveland history, and we must have the most sustainable design solution possible.

Deficiencies in the project purpose and need 1

The DEIS states: "The purpose of the Cleveland Innerbelt action is to rehabilitate and reconstruct the Innerbelt Freeway system, and to address operational, design, safety, and access shortcomings that severely impact the ability of the Innerbelt Freeway system to function acceptably."

While this may have become ODOT's narrow purpose, it was never the sole purpose of community representatives who endured the many years of planning meetings about the Innerbelt. The community started with a larger, more hopeful vision of how the reconstruction of the Innerbelt could heal the urban wounds created when the Interstate highways slashed through Cleveland neighborhoods years ago. That is why, meeting after meeting, they talked about design objectives that would improve quality of place and the potential for economic redevelopment — objectives such as caps over the highway to reconnect the urban fabric of downtown, streetscape improvements throughout the Innerbelt corridor, greenspace enhancements, downtown housing, transit and bike improvements, and improved methods to buffer neighborhoods from the noise and pollution of the highway. And that is why so many people advocated the construction of a new signature bridge over the Cuyahoga River. They dreamt that the largest infrastructure project in Cleveland history could build something wonderful and inspiring. They wanted to do something transformative — something that would move Cleveland into the 21st century.

Instead, we now have a project focused on basic maintenance of the status quo — a project to perpetuate mid-20th century infrastructure almost a decade into the 21st century. Millions of square feet of pavement and bridge decks will be rebuilt, but this won't heal the old wounds. It won't enhance the character of the city. It won't make our transportation system more sustainable. In short, it will do little to change the dynamics of a city in trouble.

ODOT's own study of economic development impacts of the billion-dollar Innerbelt project found that the project will result in only 175 additional jobs in Cuyahoga County in 2035. It is truly astonishing that one could invest so much money for so little return. The fact that the study only considered the economic changes resulting from the "difference in travel performance between a No Build scenario and the scenario that includes the Cleveland Innerbelt improvements" is further indication of ODOT's exclusive focus on the movement of traffic through Cleveland, not the city as a real place and setting for economic activity. (There was another study focused on anticipated economic impacts in the MidTown area, and it concluded "that there would be no substantial negative economic impacts on the MidTown area as a result of the project, based upon the access changes." What are we to make of such a statement? Does it mean that, instead of anticipating positive economic impacts, we should just be glad that the project won't hurt the city too much?)

Thus, the purpose of this project shows a profound lack of vision and needs to be rewritten. I suggest the following: The purpose of the Cleveland Innerbelt action is to rebuild 1950s, automobile-centric transportation infrastructure to enhance quality of place in downtown Cleveland and surrounding neighborhoods, promote more sustainable transportation alternatives, and reduce traffic congestion by reducing the need to commute.

Failure to consider transportation demand-management solutions as part of a full range of alternatives

2

The DEIS states on page ES-2: "Approximately 85 percent of the traffic using the Innerbelt Freeway has a destination within the study area during the AM peak period or an origin within the study area during the PM peak period."

This is a key statistic. It means that the traffic congestion problem that this project seeks to reduce is largely an issue of people commuting in and out of downtown. Thus, this is a perfect situation for demand-management strategies. Throughout the Innerbelt planning process I asked for such strategies to be included in the project and offered successful examples, such as the Atlantic Station development in Atlanta (http://www.epa.gov/dced/topics/atlantic_steel.htm). However, to my knowledge such strategies were never fully considered. The DEIS contains no analysis of potential demand-management strategies as one of the alternatives for the Innerbelt, even though they could have been the most cost-effective, most sustainable solutions. This is a huge omission.

A number of demand-management strategies could reduce peak-hour traffic congestion, including flex-time programs, telecommuting, transit incentives, and bicycle facility improvements. One of the best strategies could be a downtown housing development program. Early in the scoping process I suggested that the goal should be to provide more opportunities for people to live close to downtown jobs. Housing studies have shown that a large percentage of downtown residents work there and walk to work. This translates to fewer commuters at peak hours. Thus, one of the best ways — and the most sustainable way — to reduce traffic congestion is to promote downtown housing. This also would be one of the best investments for the long-term health of the city. Transportation funds could support redevelopment in many creative ways, such as land assembly, city street improvements, and the building of parking structures. The concept would be to view these investments as transportation control measures that help meet the region's transportation goals. Air quality concerns will make such strategies even more important in the coming years, as our region will have a hard time meeting new ozone standards. Demand management will also help reduce carbon emissions. Thus, demand management could reduce many kinds of harmful environmental impacts, in addition to helping to create a more vibrant city.

The EIS for the Innerbelt must include transportation demand-management strategies as one of the major alternatives considered. Failure to do so would violate guidance from the Council on Environmental Quality requiring that a full spectrum of alternatives be considered.

Failure to address stormwater pollution

3

Given the significant amount of stormwater from the proposed Innerbelt project that will discharge to Cleveland's highly valued lakefront or to the Cuyahoga River, water

resource impacts should be thoroughly explored in the Innerbelt DEIS process. Unfortunately, the DEIS falls far short of this goal.

I would like to echo the comments on this issue that were discussed recently at the NOACA TRANSWAC committee. The deficiencies noted in the DEIS included: 1) inadvertent misrepresentation, 2) failure to provide appropriate background information, 3) failure to respond to issues raised, and 4) failure to appropriately document issues.

Specifically, the following issues should be addressed:

- 1) The issue of potential violations of Lake Erie water quality standards should be thoroughly discussed. Lacking more specific or more representative data, the data and findings previously provided by the TRANSWAC committee should be incorporated into this discussion. The EIS should describe the existing water quality issues of the near shore areas of Lake Erie and the expected impact of current and new discharges of Innerbelt stormwater to Lake Erie near shore areas. ODOT should request that Ohio EPA and other agencies with water quality management responsibilities review this supplemental information to determine whether the final project discharges will comply with all water quality requirements of Ohio law.
- 2) The EIS should clearly state the estimated amount and percentage of the Innerbelt runoff which currently discharges to Lake Erie, the Cuyahoga River, and the centralized treatment facilities of NEORSD. As available, the same estimates should be provided for Innerbelt drainage system after reconstruction.
- 3) The EIS should evaluate the potential to treat its Innerbelt direct stormwater discharges as a move toward achievement of the TMDL targets set for the Cuyahoga River and current water quality standards.
- 4) The EIS should clearly explain the process for determining the current regulatory requirements for stormwater discharges from the Innerbelt. This discussion should include an explanation of how requirements are determined and where application of ODOT's best management practices would still result in a violation of Ohio water quality standards.
- 5) The EIS should evaluate a wide range of options for treatment of stormwater from the Innerbelt. This evaluation should include treatment of some or all of the Innerbelt discharge in NEORSD's central treatment facility. This option should be considered as an alternative to the separation strategy that ODOT has discussed in the draft EIS. Other options beyond BMPs should also be considered.
- 6) The public record should acknowledge TRANSWAC's request to ODOT and NEORSD to consider alternative ways to evaluate the cost and benefits of centralized treatment, lacking a rate structure for treatment by NEORSD.
- 7) The EIS should acknowledge NEORSD's letter of June 22, 2007, and consider the approach and data provided in that letter in assessing the costs and benefits of centralized treatment in NEORSD facilities.
- 8) The EIS should show pollutant loading changes that would occur as a result of the separation strategy proposed in the draft EIS. The EIS should estimate the

additional stormwater load that would be added to Lake Erie and to the Cuyahoga River. The potential for violations of water quality standards as a result of increased loads should be considered. To the extent that reductions in combined sewer loads are used as a justification for separation, planned improvements through NEORSD's Long Term Control Plan should be considered. Additionally, consideration should be given to the cost effectiveness of sizing NEORSD facilities to accommodate ODOT's loads. Example calculations on the impact of separation were provided to ODOT as part of TRANSWAC comments on ODOT's Innerbelt BMP report. The calculations show that separation could result in greater loads to receiving waters.

- 9) The EIS should address the issue of the need to provide right of way space for the installation of Best Management Practices where applicable.
- 10) The EIS should address the issue that the project, as a total reconstruction of the Innerbelt, should consider options to provide treatment for 100% of the pavement of the project rather than simply providing treatment for newly paved or newly separated stormwater.
- 11) The EIS should provide a responsiveness summary to indicate how it addressed comments made as a result of comments received on the Level 1 Ecological Survey and also on the Innerbelt Storm Water Best Management Practice report.
- 12) The EIS should discuss the development of project specific procurement specifications for water quality issues and stormwater management. Also, consideration should be given to the development of special allocations and contingency funds specific to water quality and stormwater management issues.
- 13) In its comments of March 20, 2006, TRANSWAC asked that the Innerbelt project consider designing elements of the drainage system to provide for hazardous spill containment and for precise measurement of stormwater loads. The draft EIS does not discuss the containment of hazardous spills nor is there any pledge made to provide monitoring chambers to allow for precise measurement of future stormwater loads.
- 14) FHWA and ODOT should meet with stakeholders and agencies interested in water quality and stormwater management issues to solicit assistance and to consult on a schedule to address draft EIS deficiencies. These meetings should also discuss comprehensive EIS commitments to protect water quality and consider supplemental EIS processes to compensate for issues that can not be fully addressed in the next EIS document.

Considerable work will be needed to produce a final EIS which mitigates for missing background information, identifies and evaluates management options, and has received the value of stakeholder review and input. FHWA and ODOT should quickly meet with stakeholder and agencies interested in water quality and stormwater management issues to solicit assistance and to consult on a schedule to address deficiencies. This would also be an opportunity to discuss comprehensive EIS commitments and supplemental EIS processes to compensate for issues that may not be fully addressed in the next EIS document.

Finally, one possible reason that the ODOT Project Development Process and the DEIS have not given proper attention to stormwater problems is that the project's purpose and need statement does not make clear that environmental protection is included as a project purpose and need. The project's purpose and need statement should be revised to make it clear that the Innerbelt project is expected to result in improved management of Innerbelt air quality and water quality environmental issues.

Failure to implement a complete-streets solution that includes bicycles

4

The DEIS states: "During project development for the Cleveland Innerbelt project, the public input process raised the concept of bicycle/pedestrian accommodation on the Central Viaduct Bridge alignment. The issue was considered and determined to not be practical..." The DEIS goes on to explain ODOT's reasons for inaction related to cost, need, and safety.

However, these are the same reasons that I and other bicycle advocates have disputed before. In a letter to ODOT on December 12, 2006 (see Attachment B), I explained that ODOT's facts and analysis were flawed — and that it is indeed very possible to provide equal accommodation for bicycles and pedestrians over the Flats. Moreover, providing a creatively designed bike-ped link on the Innerbelt bridge would be an inspiring thing to do. It could become a new tourist attraction for Cleveland.

Accommodating bikes and pedestrians on highway and bridge projects is no longer an experimental idea. It is being done as a matter of course in other states. At least 27 interstate highway bridges have bike lanes.

We have compiled extensive web resources on how bike lanes have been incorporated into highways across the nation. Please see:
<http://www.gcbl.org/transportation/bikes/bike-lane-on-innerbelt-bridge>

Additionally, the FHWA has released "Bicycling and Pedestrian Guidance" documentation that details what funding can be used, and how to incorporate bike lanes into interstate highway projects (<http://www.fhwa.dot.gov/environment/bikeped/bp-guid.htm>).

The DEIS violates current law and ignores current best practices when it says that bikes cannot be accommodated on the Innerbelt bridge.

In sum, the Innerbelt project is one of the most significant infrastructure projects in Cleveland history — a project that will shape our city for years to come. Unfortunately, the DEIS contains serious flaws and omissions. At this late date, I hope that these flaws can finally be corrected so the project will not be delayed. At some point ODOT and FHWA must understand that this project must be about more than just moving vehicles through Cleveland.

Thank you for the opportunity to submit comments.

Respectfully,

David Beach
Director
GreenCityBlueLake Institute
1 Wade Oval Dr.
Cleveland, OH 44106
216-231-4600, x3366
dbeach@cmnh.org

Attachment A

Innerbelt EIS comments submitted by David Beach on February 23, 2007

February 23, 2007

Craig Hebebrand
ODOT District 12
5500 Transportation Blvd.
Garfield Heights, OH 44125

**RE: Comments for Draft Environmental Impact Study,
Cleveland Innerbelt**

Dear Craig:

Please accept these comments for the Draft Environmental Impact Study (DEIS) for the Cleveland Innerbelt project. I submit these comments as someone who has been involved in the Innerbelt planning since the beginning and was a member of the Scoping Committee.

First, I would like to reinforce comments made at the Urban Core Committee meeting on February 1, 2007, about the long list of concerns from the Scoping Committee that still have not been addressed. As you recall, in early 2004 the Scoping Committee allowed the Innerbelt planning process to move forward only with the explicit condition that numerous concerns would be fully studied and addressed. The Cleveland City Planning Commission was tasked to track these concerns, and the Scoping Committee requested that it withhold final approval for the Innerbelt project unless the concerns were adequately addressed. The Planning Commission accepted this responsibility with Resolution DRC 03-201 (copy attached). The resolution summarizes most of the concerns that were raised by the numerous stakeholders involved in the scoping process. I request that this list of concerns be addressed in the DEIS.

Second, I would like to reiterate my previous comments relating to demand-side management opportunities, stormwater issues, and accommodation of non-motorized transportation modes on the Central Viaduct Bridge. On February 12, 2004, I wrote to you about these issues (copy of letter attached) as follows:

Demand-side management by promoting downtown housing

One of our fundamental beliefs is that transportation is really a land-use issue. Good land-use planning can reduce the demand for transportation by locating destinations in close proximity. And reducing the demand for transportation should be a top priority. Transportation is costly –

economically and environmentally. The less transportation we consume to have access to what we need, the better.

We can help accomplish this by making sure that transportation investments support smart development. In the case of the Innerbelt project, this can mean supporting downtown housing strategies. The goal should be to provide more opportunities for people to live close to downtown jobs. Housing studies have shown that a large percentage of downtown residents work there and walk to work. This translates to fewer commuters at peak hours. Thus, one of the best ways — and the most sustainable way — to reduce traffic congestion is to promote downtown housing. This also would be one of the best investments for the long-term health of the city. Transportation funds could support redevelopment in many creative ways, such as land assembly, city street improvements, and the building of parking structures. The concept would be to view these investments as transportation control measures (TCM) that help meet the region's transportation goals. Air quality concerns will make such strategies even more important in the coming years, as our region will have a hard time meeting the new 8-hour ozone standards.

In sum, the Innerbelt project offers a great opportunity to evaluate the potential for facilitating new development in the city while reducing peak-hour congestion on the highway system. Indeed, it would be irresponsible not to study the potential for demand reduction as part of this major project.

Stormwater

In recent years, people in Greater Cleveland have become aware that stormwater pollution is now the biggest threat to water quality. The concerns have grown as more people have realized the potential for greater public access to the lakefront and the Cuyahoga River.

Since a major contributor to the stormwater problem is runoff from transportation facilities, it is essential for the Innerbelt project to address this issue. Consequently, we strongly endorse the February 9 letter of the Northeast Ohio Regional Sewer District, which calls for comprehensive stormwater management to be an integral part of the Innerbelt project.

The Central Viaduct Bridge as a complete street

We request that when improving the Central Viaduct Bridge, ODOT make it a "complete street" by including facilities that accommodate pedestrians, bicyclists, and other non-motorized traffic. Providing this non-motorized connection will create new transportation choices that are affordable, nonpolluting, and conducive for public health by providing physical

activity. This facility will safely accommodate existing pedestrian traffic on the bridge between Tremont and downtown. It will also link downtown destinations directly to the planned Ohio & Erie Canal Towpath Trail, a major regional economic development initiative and non-motorized transportation corridor.

Compared to this Central Viaduct connection, all existing non-motorized transportation options between these points impose a large penalty in travel time, distance, and elevation change.

We note that the Federal transportation law also encourages, and perhaps requires, non-motorized travel to be accommodated in Federal-aid projects.

EcoCity Cleveland endorses the Burgess & Niple design for a two-way pedestrian/bicycle path on the north side of the Central Viaduct, and we urge ODOT to include it within the scope of work for the Cleveland Innerbelt project.

Over the past three years, I have worked with many other stakeholders to try to persuade ODOT to address these three issues — demand-side management, stormwater, and reasonable accommodation. But our pleas have been largely ignored. Therefore, I request that these issues now be addressed as part of the EIS process. This is appropriate, since the issues relate to environmental quality and the sustainability of the transportation system.

The Innerbelt project is one of the most significant infrastructure projects in Cleveland history, and I look forward to continuing to work with ODOT to make it the best possible project for the health and sustainability of the city.

Sincerely

David Beach
Executive Director
EcoCity Cleveland

Attachment B
Comments on Innerbelt bike facilities submitted to ODOT on December 12, 2006

December 12, 2006

Mr. Howard Wood
ODOT Deputy Director of Planning
1980 W. Broad Street
Columbus, Ohio 43223

Re: Cleveland Central Viaduct Bridge bike/pedestrian path – Round 2

Dear Deputy Director Wood:

Thank you for your letter of November 17, which responded to our request that a bike/pedestrian facility be included on the rehabilitated Innerbelt Central Viaduct Bridge in Cleveland. While I appreciate the time you took to provide a detailed response, I still don't think that you took our request seriously. Instead of thinking seriously about how it might be possible to accommodate non-motorized travel on the bridge, you seem to have been instructed to rule out the possibility from the start. Thus, your letter displayed ODOT's unfortunate and unfounded prejudice that cycling and walking are not legitimate means of city travel and will never be a significant part of urban transportation in Ohio.

I would like to respond to your points one by one.

Requirements for accommodating bicycles and pedestrians

In your letter you say, "Federal law and policy, and ODOT policy, compel us to consider bicycle and pedestrian facilities on bridges, where they can be accommodated at a reasonable cost." We agree on this requirement, but it seems we disagree on whether such accommodation can be achieved on the Central Viaduct at a reasonable cost.

What is a "reasonable cost" in this case? Federal policy says the cost is reasonable if it's less than 20 percent of the total cost of the project. Therefore, if the Central Viaduct Bridge is a \$300 million project, Federal policy says that ODOT should budget up to \$60 million to accommodate bicycle and pedestrian travel.

That's a lot of money, and I would not advocate spending all \$60 million on a single bike lane on the bridge (see our cost estimate below). But this number provides a sense of the scale of investment ODOT should be routinely considering to develop a more multi-modal transportation system. In this case, perhaps ODOT should consider a package of alternative transportation facilities on and around the bridge, including a bike/pedestrian facility on the bridge, completion of the Towpath Trail in the Flats, improved pedestrian environments in Tremont and downtown, transit improvements, etc.