Individual 401 Water Quality Certification Permit
Application Submittal

for

Athens High School Athletic Field Improvements
Property
Athens High School
1 High School Road
The Plains, Ohio 45780

Prepared for

Athens City Schools
25 South Plains Road
The Plains, Ohio 45780

Prepared by

Professional Service Industries, Inc.
4960 Vulcan Avenue
Columbus, Ohio, 43228

Report Date: September 27, 2011

PSI Project 655440

Bruce T. Pollard, CPG (IN)
Project Manager

Andrew S. Peiken, C.E.
Principal Consultant

Information To Build On
Engineering • Consulting • Testing

September 27, 2011

Ms. Rose McLean
Ohio EPA- Division of Surface Water
Section 401 Unit
Lazarus Government Center
P.O. Box 1049
Columbus, OH 43216-1049

Re: Individual 401 Water Quality Certification Permit Application Submittal
Athens High School Athletic Field Improvements
Athens High School
1 High School Road
The Plains, Ohio 45780

Dear Ms. McLean:

Professional Service Industries, Inc. (PSI) has been retained by Mr. Carl Martin, Athens City School Superintendant, to provide Individual Permitting (IP) services for the above referenced property improvements. On behalf of our client, we request 401 water quality certification authorization for the soil fill to be placed into 426 linear feet of intermittent stream in the area of the high school athletic facilities for the construction of a new athletic field and associated parking lot located at 1 High School Road, The Plains, Ohio. The intermittent stream to be impacted has a 0.3 square mile watershed and scored 49 on the attached HHEI form.

PSI performed wetland delineation services for the property that were approved by the US Army Corps of Engineers, Huntington District. An attached email from Ms. Crystal Chambers dated August 30, 2011 confirms their involvement in the process and replaces the requirements for a Corps Public Notice and JD letter. No wetlands were located on the proposed development portion of the property.

Pursuant to Section 4040(b)(1) Guidelines, alternative locations on the Athens High School property, The Plains, Ohio would not be as suitable for the planned development complex if located further from the nearby access roads or removed from the other athletic fields. The proposed improvements complex depends on the close proximity of the existing athletic facilities in this portion of the high school property to complete the development purpose.

Attachments to this letter, provided for your review, include the necessary section 401 application, a mitigation proposal and other required pertinent information. One hard copy of this information and one pdf are being submitted to OEPA as required. A pdf copy is being submitted to the USACE for their reference. The applicant plans to mitigate the

stream impacts by placing a deed restricted conservation easement on a nearby intermittent stream (HHEI score 71) on Athens School District property at a ratio of 1.5 : 1.0.

Please review this information and contact this office if you have any questions or need additional information.

Respectfully submitted,
PROFESSIONAL SERVICE INDUSTRIES, INC.

Bruce T. Pollard, CPG (IN), EP
Senior Project Manager

Andrew S. Peiken, C.E.
Principal Consultant

cc: Ms. Crystal Chambers, pdf

Attachments: Section 401 Water Quality Certification Application and Fees

USACE Email to satisfy the JD Letter and Public Notice, August 30, 2011
Alternative Site Development Plans (3); (Non-Degradation, Minimal Degradation and Preferred Alternative - 8.5x11)
Question 10 Socio-Economic Analysis for Each Design and SEJ Table
PSI Delineation Report dated June 13, 2011 including Site Photographs and HHEI form for Impacted Stream
Mitigation Proposal, HHEI for Mitigation Stream and Photographs of Mitigation Stream Reaches
ODNR Endangered Species Search Request (7 pages) and Response (2 pages)
PSI Endangered Species Habitat Evaluation Letter (6 pages) and USFWS Response Letter (1 page)

APPLICATION FOR OHIO EPA
SECTION 401 WATER QUALITY CERTIFICATION

Effective October 1, 1996
Revised August, 1998

This application must be completed whenever a proposed activity requires an individual Clean Water Act Section 401 Water Quality Certification (Section 401 certification) from Ohio EPA. A Section 401 certification from the State is required to obtain a federal Clean Water Act Section 404 permit from the U.S. Army Corps Engineers, or any other federal permits or licenses for projects that will result in a discharge of dredged or fill material to any waters of the State. To determine whether you need to submit this application to Ohio EPA, contact the U.S. Army Corps of Engineers District Office with jurisdiction over your project, or other federal agencies reviewing your application for a federal permit to discharge dredged or fill material to waters of the State, or an Ohio EPA Section 401 Coordinator at (614) 644-2001.

The Ohio EPA Section 401 Water Quality Certification Program is authorized by Section 401 of the Clean Water Act (33 U.S.C. 1251) and the Ohio Revised Code Section 6111.03(P). Ohio Administrative Code (OAC) Chapter 3745-32 outlines the application process and criteria for decision by the Director of Ohio EPA. In order for Ohio EPA to issue a Section 401 certification, the project must comply with Ohio's Water Quality Standards (OAC 3745-1) and not potentially result in an adverse long-term or short-term impact on water quality. Included in the Water Quality Standards is the Antidegradation Rule (OAC Rule 3745-1-05), effective October 1, 1996, revised October, 1997 and May, 1998. The Rule includes additional application requirements and public participation procedures. **Because there is a lowering of water quality associated with every project being reviewed for Section 401 certification, every Section 401 certification applicant must provide the information required in Part 10 (pages 3 and 4) of this application.** In addition, applications for projects that will result in discharges of dredged or fill material to wetlands must include a wetland delineation report approved by the Corps of Engineers, a wetland assessment with a proposed assignment of wetland category (ies), official documentation on evaluation of the wetland for threatened or endangered species, and appropriate avoidance, minimization, and mitigation as prescribed in OAC 3745-1-50 to 3745-1-54. Ohio EPA will evaluate the applicant's proposed wetland category assignment and make the final assignment.

Information provided with the application will be used to evaluate the project for certification and is a matter of public record. If the Director determines that the application lacks information necessary to determine whether the applicant has demonstrated the criteria set forth in OAC Rule 3745-32-05(A) and OAC Chapter 3745-1, Ohio EPA will inform the applicant in writing of the additional information that must be submitted. The application will not be accepted until the application is considered complete by the Section 401 Coordinator. An Ohio EPA Section 401 Coordinator will inform you in writing when your application is determined to be complete.

Please submit the following to "Section 401 Supervisor, Ohio EPA/DSW, P.O. Box 1049, Columbus, Ohio 43216-1049:

- Four (4) sets of the completed application form, including the location of the project (preferably on a USGS quadrangle) and 8-1/2 x 11" scaled plan drawings and sections.
- One (1) set of original scaled plan drawings and cross-sections (or good reproducible copies).

(See Application Primer for detailed instructions)

1. The federal permitting agency has determined this project: (check appropriate box and fill in blanks)

   a. X requires an individual 404 permit/401 certification- Public Notice # (if known)_____

   b. ____ requires a Section 401 certification to be authorized by Nationwide Permit #_____

   c. ____ requires a modified 404 permit/401 certification for original Public Notice #_____

   d. ____ requires a federal permit under _____ jurisdiction identified by #_____

   e. ____ requires a modified federal permit under_____ jurisdiction identified by #_____

Click to clear all entered information (on all 4 pages of this form) CLEAR

2. Application number (to be assigned by Ohio EPA):

3. Name and address of applicant:
Mr. Carl Martin
Athens City Schools
25 South Plains Road
The Plains, OH 45780

Telephone number during business hours:
(_____)_____(Residence)
(740) 797-4544 (Office)

3a. Signature of Applicant: Carl Martin Date: 6-23-11

4. Name, address and title of authorized agent:
Bruce T. Pollard
Professional Service Industries, Inc. (PSI)
4960 Vulcan Drive
Columbus, OH 43228

Telephone number during business hours:
(_____)_____(Residence)
(614) 876-8000 (Office)

4a. Statement of Authorization: I hereby designate and authorize the above-named agent to act in my behalf in the processing of this permit application, and to furnish, upon request, supplemental information in support of the application.

Signature of Applicant: Carl Martin Date: 6-23-11

5. Location on land where activity exists or is proposed. Indicate coordinates of a fixed reference point at the impact site (if known) and the coordinate system and datum used.

Address:

1 High School Road, The Plains, OH 45780; North 39° 22' 12.82" X West 82° 07' 34.76"
Street, Road, Route, and Coordinates, or other descriptive location

Hocking River	Athens Co.	Athens Twp.	The Plains	OH	45780
Watershed	County	Township	City	State	Zip Code

6. Is any portion of the activity for which authorization is sought complete? _____ Yes __X__ No
If answer is "yes," give reasons, month and year activity was completed. Indicate the existing work on the drawings.

7. List all approvals or certifications and denials received from other federal, interstate, state or local agencies for any structures, construction, discharge or other activities described in this application.

Issuing Agency	Type of Approval	Identification No.	Date of Application	Date of Approval	Date of Denial
N/A					

8. DESCRIPTION OF THE ACTIVITY (fill in information in the following four blocks - 8a, 8b, 8c & 9)

8a. Activity: Describe the Overall Activity:
Clean soil fill will be placed into 426 linear feet of intermittent stream to improve the athletic facilities (add a softball field and parking lot) at the Athens High School athletic field and provide flat areas for development of badly needed parking space in the proximity of the athletic activities.

8b. Purpose: Describe the purpose, need and intended use of the activity:

See 8a.

8c. Discharge of dredged or fill material: Describe type, quantity of dredged material (in cubic yards), and quantity of fill material (in cubic yards).

Approximately 5,500 cubic yards of clean soil fill will be used to bury the culverted 426 linear foot intermittent stream reach.

9. Waterbody and location of waterbody or upland where activity exists or is proposed, or location in relation to a stream, lake, wetland, wellhead or water intake (if known). Indicate the distance to, and the name of any receiving stream, if appropriate.

An unnamed tributary of the Hocking River will be impacted by culverting and soil cover. The impact will be approximately 1.0 miles northwest of the Hocking River, the next receiving stream.

10. To address the requirements of the Antidegradation Rule, your application must include a report evaluating the:

- Preferred Design (your project) and Mitigative Techniques
- Minimal Degradation Alternative(s) (scaled-down version(s) of your project) and Mitigative Techniques
- Non-Degradation Alternative(s) (project resulting in avoidance of all waters of the state)

At a minimum, item a) below must be completed for the Preferred Design, the Minimal Degradation Alternative(s), and the Non-Degradation Alternative(s), followed by completion of item b) for each alternative, and so on, until all items have been discussed for each alternative (see Primer for specific instructions).

10a) Provide a detailed description of any construction work, fill or other structures to occur or to be placed in or near the surface water. Identify all substances to be discharged, including the cubic yardage of dredged or fill material to be discharged to the surface water.

10b) Describe the magnitude of the proposed lowering of water quality. Include the anticipated impact of the proposed lowering of water quality on aquatic life and wildlife, including threatened and endangered species (include written comments from Ohio Department of Natural Resources and U.S. Fish and Wildlife Service), important commercial or recreational sport fish species, other individual species, and the overall aquatic community structure and function. Include a Corps of Engineers approved wetland delineation.

10c) Include a discussion of the technical feasibility, cost effectiveness, and availability. In addition, the reliability of each alternative shall be addressed (including potential recurring operational and maintenance difficulties that could lead to increased surface water degradation.)

10d) For regional sewage collection and treatment facilities, include a discussion of the technical feasibility, cost effectiveness and availability, and long-range plans outlined in state or local water quality management planning documents and applicable facility planning documents.

10e) To the extent that information is available, list and describe any government and/or privately sponsored conservation projects that exist or may have been formed to specifically target improvement of water quality or enhancement of recreational opportunities on the affected water resource.

10f) Provide an outline of the costs of water pollution controls associated with the proposed activity. This may include the cost of best management practices to be used during construction and operation of the project.

10g) Describe any impacts on human health and the overall quality and value of the water resource.

10h) Describe and provide an estimate of the important social and economic benefits to be realized through this project. Include the number and types of jobs created and tax revenues generated and a brief discussion on the condition of the local economy.

10i) Describe and provide an estimate of the important social and economic benefits that may be lost as a result of this project. Include the effect on commercial and recreational use of the water resource, including effects of lower water quality on recreation, tourism, aesthetics, or other use and enjoyment by humans.

10j) Describe environmental benefits, including water quality, lost and gained as a result of this project. Include the effects on the aquatic life, wildlife, threatened or endangered species.

10k) Describe mitigation techniques proposed (except for the Non-Degradation Alternative):

- Describe proposed Wetland Mitigation (see **OAC 3745-1-54** and Primer)
- Describe proposed Stream, Lake, Pond Mitigation (see Primer)

11. Application is hereby made for a Section 401 Water Quality Certification. I certify that I am familiar with the information contained in this application and, to the best of my knowledge and belief, such information is true, complete and accurate. I further certify that I possess the authority to undertake the proposed activities or I am acting as the duly authorized agent of the applicant.

Carl Martin — Signature of Applicant

6-23-11 — Date

Bruce D. Fullerton — Signature of Agent

The application must be signed by the person who desires to undertake the proposed activity (applicant) or it may be signed by a duly authorized agent if the statement in Block 3 has been filled out and signed.

Vendor: TREASURER, STATE OF OHIO - 011546 Vendor Acct: Check No. 093829

INVOICE NUMBER	PO NUMBER	TI	FUND	FUNC.	OBJ.	SPCC	SUBJ.	OPU	IL	JOB	NET AMOUNT
0000001	0012529	05	003	5300	418	9001	000000	012	00	000	4,460.00

BOARD OF EDUCATION
Message:

TOTAL 4,460.00

BOARD OF EDUCATION
ATHENS CITY SCHOOL DISTRICT
25 S. PLAINS ROAD
THE PLAINS, OHIO 45780

No. 093829

56-103/442

DATE
09/23/11

VOID AFTER 90 DAYS

PAY $******4,460.00

Four Thousand Four Hundred Sixty & no/100 Dollars

TO THE ORDER OF TREASURER, STATE OF OHIO

Bryan M. Bunting TREASURER

⑈093829⑈ ⑆044201030⑆ 16 512 0⑈

See Reverse Side For Easy Opening Instructions

BOARD OF EDUCATION
ATHENS CITY SCHOOL DISTRICT
25 S. PLAINS ROAD
THE PLAINS, OHIO 45780

TREASURER, STATE OF OHIO

From: Chambers, Crystal D LRH
Sent: Tuesday, August 30, 2011 9:47 AM
To: 'McLean, Rose'
Cc: 'Pollard, Bruce'
Subject: Athens County High School (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Good morning Rose,

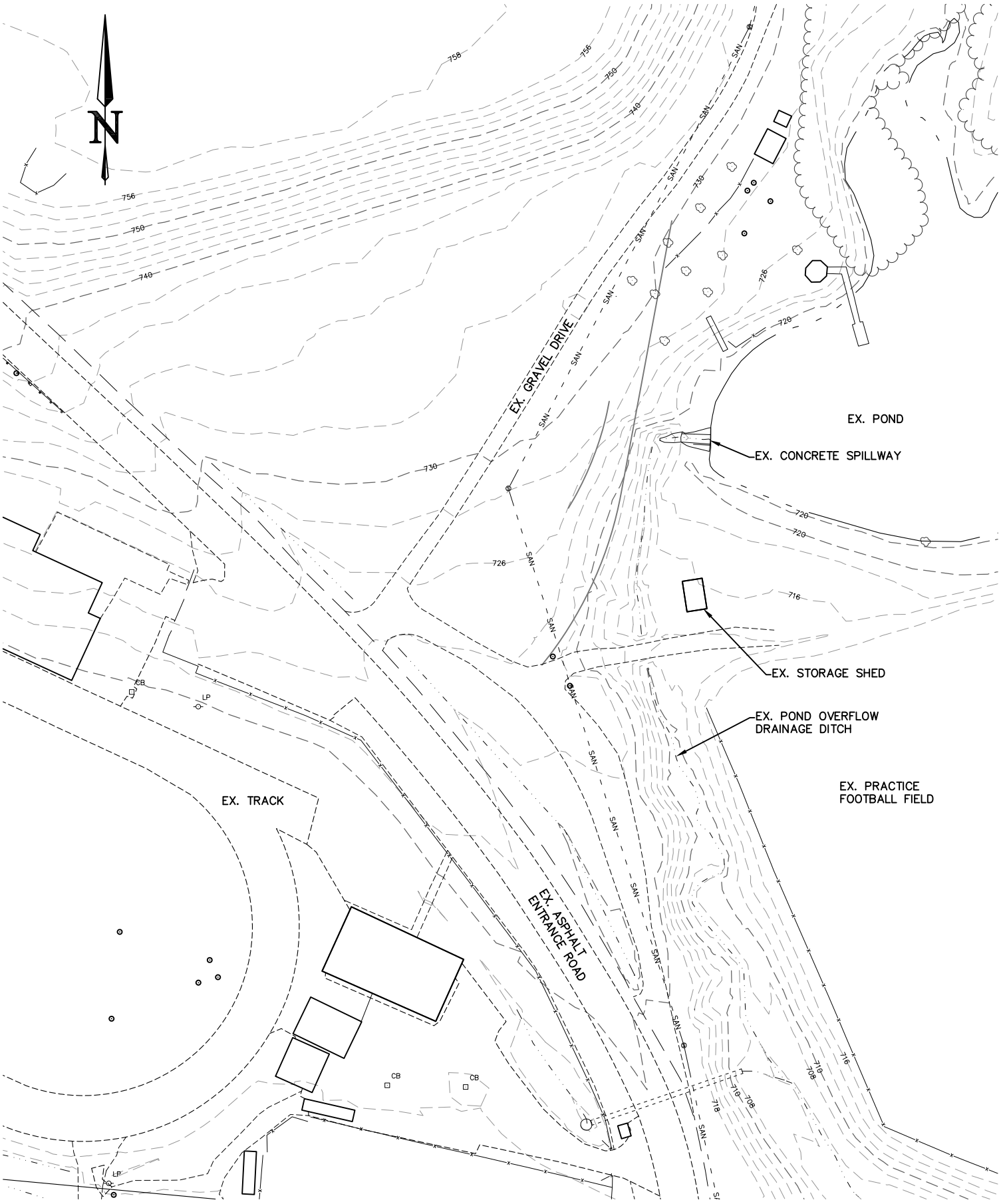
The Corps will be issuing a NWP 39 (with a waiver from the District Engineer for the linear feet of stream impacts) for the Athens County High School athletic fields project. The applicant has agreed to a Preliminary Jurisdiction Determination (PJD) stating ALL waters on site are waters of the United States. This includes the 426 lf of an U/T of the Hocking River that will be impacted during the construction of the athletic field. At this time, the Corps is awaiting on a Phase I archeological survey of the site to process the authorization. If you need any additional information, please let me know.

Site Info:

State: Ohio
County: Athens
City: The Plains
Longitude: 82°07'34.76"
Latitude: 39°22'12.82"
Nearest Water-body: unnamed tributary of Hocking River

Thanks!

Crystal Chambers
Geographer-North Regulatory Section
United States Army Corps of Engineers
502 8th Street
Huntington, WV 25701
Direct Line 304-399-5630
Main Line 304-399-5210
Fax 304-399-5085
http://www.lrh.usace.army.mil/



ATHENS CITY SCHOOL DISTRICT

SOFTBALL FIELD AND
DITCH GRADING PROJECT

NON-DEGRADATION PLAN

RJM engineering co.

66 S. PLAINS ROAD
THE PLAINS, OH 45780
(740) 797-0500
www.rjmengineeringco.com
ENGINEERING SURVEYING PLANNING

VILLAGE OF THE PLAINS

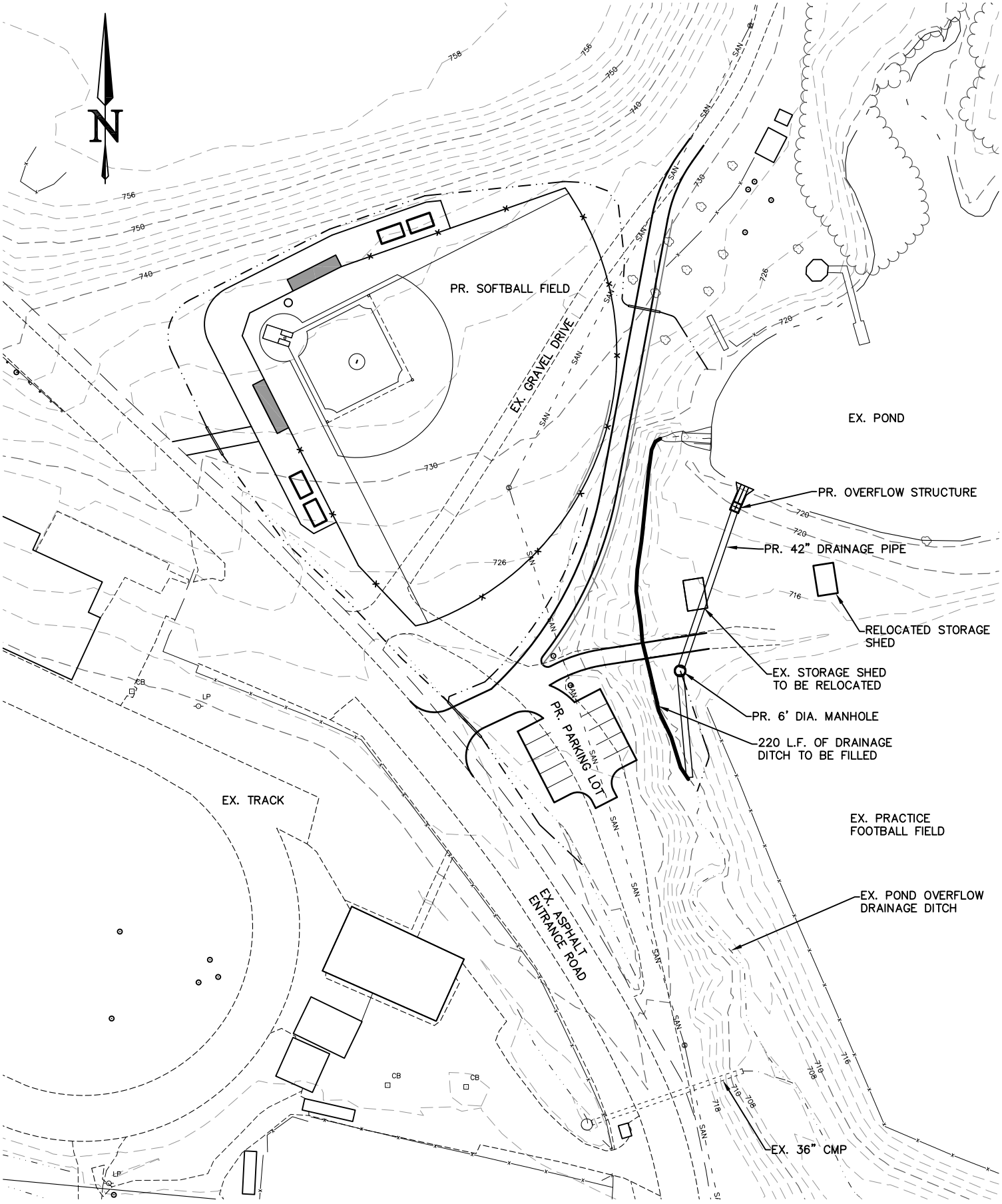
ATHENS COUNTY, OHIO

SCALE 0 40
1" = 80 FEET

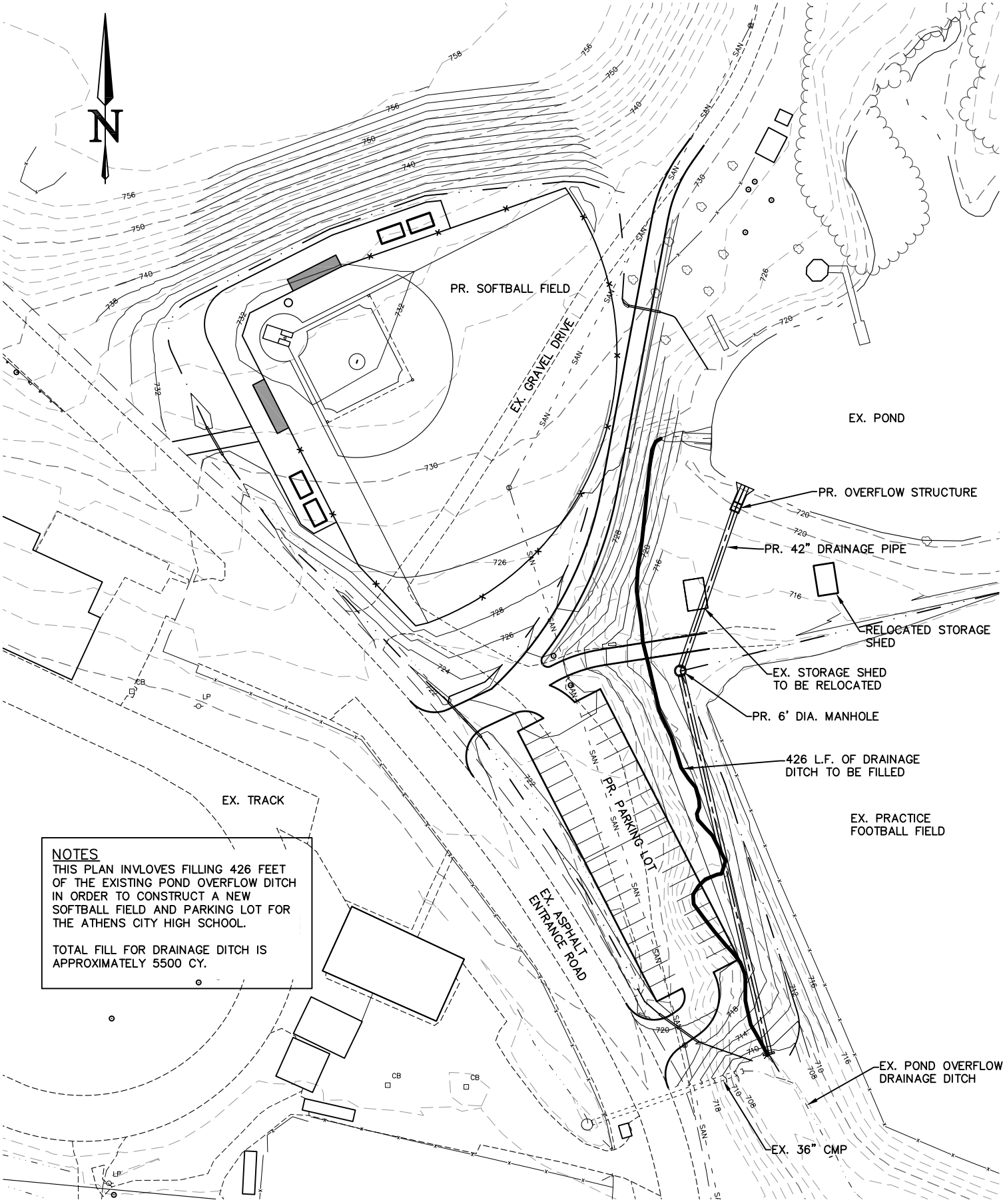
DATE
MAY 19, 2011

JOB NO.
110259

SHEET NO.
1/3



ATHENS CITY SCHOOL DISTRICT SOFTBALL FIELD AND DITCH GRADING PROJECT MINIMAL DEGRADATION PLAN	RJM engineering co.	66 S. PLAINS ROAD THE PLAINS, OH 45780 (740) 797-0500 www.rjmengineeringco.com ENGINEERING SURVEYING PLANNING	VILLAGE OF THE PLAINS ATHENS COUNTY, OHIO SCALE 0 40 1" = 80 FEET	DATE MAY 19, 2011 JOB NO. 110259 SHEET NO. 2/3



NOTES

THIS PLAN INVLOVES FILLING 426 FEET OF THE EXISTING POND OVERFLOW DITCH IN ORDER TO CONSTRUCT A NEW SOFTBALL FIELD AND PARKING LOT FOR THE ATHENS CITY HIGH SCHOOL.

TOTAL FILL FOR DRAINAGE DITCH IS APPROXIMATELY 5500 CY.

ATHENS CITY SCHOOL DISTRICT SOFTBALL FIELD AND DITCH GRADING PROJECT PREFERRED DEVELOPMENT PLAN	RJM engineering co.	66 S. PLAINS ROAD THE PLAINS, OH 45780 (740) 797-0500 www.rjmengineeringco.com ENGINEERING SURVEYING PLANNING	VILLAGE OF THE PLAINS ATHENS COUNTY, OHIO SCALE 0 40 1" = 80 FEET	DATE MAY 19, 2011 JOB NO. 110259 SHEET NO. 3/3

Non Degradation Alternative

10a). No dredge or fill material would be placed into surface waters.

10b). Approximately 426 linear feet of existing intermittent stream runoff would be incased in a culvert properly sized by a civil engineer for the runoff potential. Surface water entering the stream watershed would remain the same, except for the additional runoff from the 0.32 acre proposed parking lot surface. This water will flow off the parking lot both east and west and eventually flow into the stream downstream of the impacted portion. Previous runoff sediment load from the grass and formerly tree covered steep hillside slope would be minimized by the developed areas. Erosion of the steep slope would be minimized. The stream contains little or no water during drier periods of the year. Because of the intermittent water flow and the presence of the area on a public athletic field minimal aquatic life and wildlife would be present.

A request was sent to the ODNR to search their databases for known endangered species habitats within the project area. No records of endangered species were identified within the proposed Athens High School project area. No existing or proposed nature preserves, scenic rivers, unique ecological sites, geological features, breeding or non-breeding animal populations, or champion trees were identified. A copy of the ODNR letter is attached. USFWS has also commented on endangered species habitat potential by letter attached.

The wetland delineation preliminary verification and public notice information is contained in an email from the Corps dated August 30, 2011. A copy of the pre-JD and PN email is included with this submittal.

10c). As shown on the attached site development plan (Non degradation Alternative), the stream flows through the area which will require fill placement to allow for the softball field size requirements and a suitable number of parking spaces in the adjacent parking lot. This alternative would cause a loss of enough space for a regulation softball field and parking for the sports activity spectators, eliminating them altogether. The denuded hillside left after the effects of the tornado and the removal of the trees would be exposed to the weather and erosion could be a problem to maintain. Water quality would be degraded by any erosion that might occur from surface water runoff on the sloped area because of the lack of vegetation on the hillside.

The athletic area of the high school campus is in need of additional parking spaces for sports activities. The parking lot area proposed is in close proximity to the snack bar, restrooms and athletic field locations.

Since there is no work associated with this alternative, cost effectiveness is not a consideration.

Itemization of the anticipated costs to construct this alternative:
No actions would be taken for this alternative.

Itemization of the anticipated economic profits or losses for this alternative:
There are no anticipated economic profits from this alternative.

Availability
Proven technology is available to complete each project alternative as proposed.

10d). N/A

10e). No reasonably attainable information exists that indicates this area has been targeted for water quality improvement. Acid mine drainage (AMD) is a concern of the Hocking River watershed, however the area of concern does not contribute AMD to the river. No increase or decrease of water quantities would result from this alternative. The property is located within an active high school campus and developing section of The Plains.

10f). The costs for water pollution control under this alternative are estimated as follows:

1. Erosion Control – Some erosion control in the way of seeding and mulching may be required to protect the eastern hillside slope from eroding into the stream because of the previous removal of the trees. Estimate of **$1,500.00**

10g). No impacts to human health are anticipated under this alternative. Completed headwater habitat evaluation index (HHEI) forms are attached for review to categorize the stream on the property.

10h). No significant socioeconomic benefits for the local economy can be foreseen by avoiding the stream in this area. There has been a trend of increasing unemployment over the past several years. The local economy is primarily middle working class.

Approximately 8 jobs will be created (directly or indirectly) by the preferred project. Approximately **$1,300** in state and local tax revenues will be generated by the preferred project design. These will be lost if the project is not constructed. An economic summary table of each alternative follows this “question 10” section [Social and Economic Justification (SEJ) Table].

Give a brief description of the local economy (i.e. median household income, poverty rates, population growth, unemployment, etc.)
The area is located in central Athens County, Ohio. The immediate surrounding area is primarily a mixed residential and commercial area, with a few manufacturing, warehousing and transportation facilities. Beyond this, is a mix of

residential, retail, educational center, agricultural land and other undeveloped land. The area is within close proximity of major highways.

Economically, the immediate area would be between the middle and lower end of Athens County economic averages.

Statistically (based upon Department of Development data, released 2010), Athens County has a median household income of $30,190 in 2010 with a poverty rate of 18.0%. Population of the county was 64,757 as of 2010; the percentage increase in population was 3.9%, 2000 to 2010. There are 21,898 households, with an average of 1.8 persons per household; there are 128.0 persons per square mile. The median value of owner-occupied housing units is $106,500; there were 25 housing units authorized by permits in 2009.

There are 1,000 private business establishments. The mean travel time to work is 20.6 minutes. The unemployment rate is 8.6% as of 2009.

Discuss the potential direct and indirect increases in property values due to the proposed project.
No direct or indirect increases in property values are expected as a result of the proposed project.

Discuss the positive impacts on the recreational and commercial opportunities of the water resource, including tourism.
The existing water resource consists of an intermittent waterway that occasionally is dry for periods of the year. This alternative leaves the resource in its existing state, surrounded by athletic fields and driveway access roads, etc. No recreational opportunities currently exist at the waterway area. There appears to be no positive impacts on either recreational or commercial opportunities for this alternative.

Discuss businesses that will be positively impacted by the proposed project.
Other than construction companies on a temporary basis, no businesses will be positively impacted by the proposed project.

Give a brief discussion regarding the positive aesthetics of the proposed project.
There do not appear to be any positive aesthetics of this alternative of the proposed project. The stream area will still contain water periodically throughout the year and will be an unused portion of an athletic field portion of the high school property.

10i). Avoidance of the stream would cause the loss of 38 additional parking spaces and a soft ball diamond.

Our client states that the lack of the proposed parking spaces in this proximity of the athletic field will cause unsafe travel for fans and pedestrians crossing drives

and roadways to get to games and playing fields as well as restrooms and snack areas.
No jobs will be lost as a result of the project, other than those forgone as compared to the Minimal Design or the Preferred Design**.** No state and local tax revenues will be lost as a result of the project, other than those forgone as compared to the Minimal Design or the Preferred Design.

Discuss the potential direct and indirect lowering of property values due to the proposed project.
No direct and indirect lowering of property values are expected as a result of the proposed project.

Discuss the negative impacts on the recreational and commercial opportunities of the water resource, including tourism.
No recreational opportunities of the water resource exist on the area.

Discuss businesses that will be negatively impacted by the proposed project.
Other than economic profits and jobs for construction businesses foregone as compared to the Minimal Design or the Preferred Design, there will be no negative impacts on businesses in the area.

Give a brief discussion regarding the negative aesthetics of the proposed project.
The proposed project will not change the environmental aesthetics of the area. The area is currently designated as athletic activities for the high school and the area should be utilized in the most practical sense to keep athletic activities in a concentrated portion of the high school property. This alternative will leave the stream traversing an unused potentially athletic portion of the property.

The high school lies within a residential area. Tourism or water related recreational use of the project area is unlikely.

10j). Under the non-degradation alternative, no significant environmental benefits would be realized. Environmental losses would include the paving of the surrounding upland areas; however, no endangered or threatened species habitats have been identified in the project area. The area is not known to support a population of migratory waterfowl. No areas would be directly impacted under this alternative, which contain significant amphibian breeding grounds.

10k.) N/A

Minimal Degradation Alternative

10a). Approximately 3,700 cubic yards of compacted engineered fill would be placed into approximately 220 linear feet of jurisdictional intermittent stream course. In the proposed parking area, an aggregate base, layered adhesion materials, and asphaltic concrete would be placed over the fill, as is typical in this type of construction. Soil fill would be placed to build the platform and level playing field for the softball diamond and field over the stream course to provide regulation sized field measurements as required.

10b). Approximately 0.12 square miles of existing surface water runoff would be placed within a properly sized culvert as part of the storm water management system that discharges into the remaining intermittent stream bed and eventually into the Hocking River. This system would not completely prevent surface runoff containing salts or petroleum products from entering the watershed. The slope from the edge of the playing field and paved areas to the toe of fill slope would be seeded with an ODNR approved mix of native grasses. Landscaping would be planted on the sloped embankment areas to provide aesthetic value to the area. Since runoff would only be incased for a short distance into a storm water system, some pollutants would not enter the stream below the pond as a result of the project; however, some runoff from the parking lot should still be expected. Water quality impacts would likely be minimal.

A request was sent to ODNR to search their biodiversity database for known endangered species habitats, etc. within the project area. No records of endangered species were found in the project area. No existing or proposed nature preserves, scenic rivers, unique ecological site, geological features, breeding or non-breeding animal populations, or champion trees were identified. A copy of the ODNR letter is attached. USFWS has also commented on endangered species habitat potential by letter attached.

The jurisdictional waters delineation has been preliminarily verified by email by the Corps of Engineers dated August 30, 2011. A copy of the pre-JD and public notice email is included with this submittal.

10c). As shown on the attached site development plan (“Minimal Degradation Alternative), the stream flows through the area that would require a soil fill slope to construct the softball field and parking lot as designed. The civil designer has re-arranged the softball in several configurations in an attempt to avoid impacts, however the regulation sized ball field would not fit without the potential impacts being made. This alternative would allow the softball field to be constructed, but not allow enough parking spaces for the activities

The construction of the softball field and small parking area over the proposed stream fill areas would be technically feasible. Organic surface soil materials would be removed and used as topsoil in an upland area or as outfield grass seed base. Compacted non-organic engineered fill would replace the organic material. Placement of the pavement over the fill would be the same as in the upland areas. The cost of the small additional parking lot would be approximately **$10,000.00,** making it minimally cost effective when compared to potential parking space made available if more linear footage is impacted surmounting the safety and operational issues of the public spectators.

Existing pavement surfaces will continue to drain into the stream. Hydrocarbon fluids (motor oils and fuels) from vehicles may continue to contaminate stream waters and soil making them potentially unsafe for both flora and fauna use.

Cost Effectiveness

Itemize the anticipated costs to construct each alternative.
Soil compaction and filling, paving and silt fencing to construct the minimal alternative design would cost approximately **$105,000.00.**

Itemize the anticipated economic profits or losses for each alternative.
There are no anticipated economic profits from this alternative.

There are no potential economic losses associated with this alternative.

Is the technology available to complete the project/alternative as proposed, or is it theoretical or unproven?
Proven technology is available to complete each project alternative as proposed.

Availability

10d). N/A

10e). No information is known that indicates this area has been targeted for water quality improvement. The site is located in a residential and commercial area.

10f). The costs for water pollution control under this alternative are estimated as follows:

1. Silt Fencing to protect the remaining stream course during construction (includes installation time) – **$1,000.00**.
2. Erosion Control – **$1,000.00** for hydro-seeding and mulching for entire project.
3. Trees and/or landscaping and grass around remaining stream and on the newly created sloped fill area - **$2,500.00**
4. Storm Water Management System **- $27,000.00** for whole project.

5. Equipment Avoidance of wetland areas – Approximately **$700.00** extra equipment operator time to work around the remaining stream area, rather than work through it.

10g). No impacts to human health are anticipated under this alternative. Minimal impacts to the water resource value are anticipated.

10h). Our client states that the Minimal design could allow for some gain regarding parking availability, however, this would still not allow the smooth and safe flow of pedestrian traffic through the athletic field area, and would still create "traffic jams" and safety hazards.

Include the number of jobs to be created (directly and indirectly) by the project.
It is estimated that 8 jobs will be created (directly and indirectly) by the project.

Include state and local tax revenues to be generated.
An estimated **$900** in combined state and local tax revenues will be generated as a result of completion of the project.

Give a brief description of the local economy (i.e. median household income, poverty rates, population growth, unemployment, etc.)
The area is located in central Athens County, Ohio. The immediate surrounding area is primarily a mixed residential and commercial area, with a few manufacturing, warehousing and transportation facilities. Beyond this, is a mix of residential, retail, educational center, agricultural land and other undeveloped land. The area is within close proximity of major highways.

Economically, the immediate area would be between the middle and lower end of Athens County economic averages.

Statistically (based upon Department of Development data, released 2010), Athens County has a median household income of $30,190 in 2010 with a poverty rate of 18.0%. Population of the county was 64,757 as of 2010; the percentage increase in population was 3.9%, 2000 to 2010. There are 21,898 households, with an average of 1.8 persons per household; there are 128.0 persons per square mile. The median value of owner-occupied housing units is $106,500; there were 25 housing units authorized by permits in 2009.

There are 1,000 private business establishments. The mean travel time to work is 20.6 minutes. The unemployment rate is 8.6% as of 2009.

Discuss the potential direct and indirect increases in property values due to the proposed project.
Minimal direct and indirect increases in school property values could be expected as a result of the proposed minimal degradation project.

Discuss the positive impacts on the recreational and commercial opportunities of the water resource, including tourism.
The existing water resource consists of an intermittent stream which is dry for some periods of the year. This alternative leaves approximately 35% of the stream on the school property in its existing state, surrounded by the athletic fields and supporting drives, etc. as before. No water-oriented recreational opportunities exist on the area. There appear to be no positive impacts on water-oriented recreational opportunities for this alternative. Commercially, the project would allow the potential addition of temporary jobs, although the net economic effect would still be minimal.

Discuss businesses that will be positively impacted by the proposed project.
There may be some positive benefit to the contractor that constructs the athletic field and parking lot, however, the benefits are expected to be minimal.

Give a brief discussion regarding the positive aesthetics of the proposed project.
There appear to be positive aesthetics of the proposed project, such as the visual aspect of the softball field in close proximity to other playing fields in the athletic field area.

10i). Paving only the minimal parking area would still cause the safety issues by not providing adequate parking for the anticipated crowds of spectators and players visiting the athletic fields.

The water quality and functional losses of the stream under this alternative would be negligible since the main downstream, nearly permanent flowing portions of the stream would be avoided and only a lower quality portion would be impacted.

Tourism and recreational use of the area would be expected to increase with this design.

Include the number of jobs to be lost (directly and indirectly) by the project.
No jobs will be lost as a result of the project except that the jobs will be of shorter duration during construction.

Include state and local tax revenues to be lost.
State and local tax revenues will be lost as a result of the project, because of the less work time associated with this alternative.

Discuss the potential direct and indirect lowering of property values due to the proposed project.
No direct and indirect lowering of property values are expected as a result of the proposed project.

Discuss the negative impacts on the recreational and commercial opportunities of the water resources, including tourism.

No water-oriented recreational opportunities exist on the area currently.

Discuss businesses that will be negatively impacted by the proposed project.
Other than economic profits and jobs foregone to a contractor as compared to the Preferred Design, there will be no negative impacts on other businesses in the area.

Give a brief discussion regarding the negative aesthetics of the proposed project.
The proposed project will not negatively change the aesthetics of the property, but enhance the athletic field complex.

10j). Under the Minimal Degradation Alternative, significant environmental benefits would be realized in that the athletic field complex would be more diverse and better configured for most efficient and safe use. Environmental losses would include impacts to the designated stream segment, however, no endangered or threatened species or habitats have been identified in the area. The area is not known to support a population of migratory waterfowl. No areas would be directly impacted under this alternative containing significant amphibian breeding grounds. Amphibian populations, if present, would continue to prosper in the remaining downstream preserved portions of the stream.

10k.) Creation of on-site stream mitigation would require excavation and additional space, as well as being placed in an active human environment like the athletic field area. It was therefore determined that a suitable area with positive environmental impacts for on-site mitigation does not exist at this property. Efforts to create and/or restore streams are often most successful when directed toward the establishment of perpetual conservation easements on existing streams if the applicant has the resources rather than on small fragments of streams adjacent to the project site which are usually surrounded and threatened by various types of encroachment. On-site or near site (within 1 mile) compensatory mitigation would be more environmentally friendly given the proximity and non-association with a metropolitan area of the mitigation location. Also, on site mitigation would not be feasible due to the lack of potential available watershed and hydrology on the project property. Therefore, mitigation to a property within 1 mile of the project location owned by the Athens City School District not threatened by urban encroachment, was considered the best option for the proposed stream loss.

Mitigation Ratios are calculated as follows:
220 linear feet (total impact) to mitigate off site at 1.5 to 1.
1.5 times 220 = 330 linear feet of conservation easement needed.

The Athens City School District has agreed to permanently establish a conservation easement on streams within their 30 acre science laboratory property located less than 1 mile west of the project property. The conservation easement will be platted and filed in the Athens County Courthouse upon issuance of the permit with the regulatory specified requirements agreed upon.

Preferred Alternative

10a). Approximately 5,500 cubic yards of site soils would be required to fill the 426 linear feet of the intermittent stream and complete the proper grading for the planned improvements. The area would become leveled and paved in portions with fills being made to grade the site for drainage. An aggregate base, layer adhesion materials, and asphaltic concrete would be placed over the fill in the parking area, as is typical in this type of construction. Grass would be planted on the softball field.

10b). Approximately 0.12 square miles of existing surface water runoff would be placed within a properly sized culvert as part of the storm water management system that discharges into the remaining intermittent stream bed and eventually into the Hocking River. This system would not completely prevent surface runoff containing salts or petroleum products from entering the watershed. The slope from the edge of the playing field and paved areas to the toe of fill slope would be seeded with an ODNR approved mix of native grasses. Landscaping would be planted on the sloped embankment areas to provide aesthetic value to the area. Since runoff would only be incased for a short distance into a storm water system, some pollutants would not enter the stream below the pond as a result of the project; however, some runoff from the parking lot should still be expected. Water quality impacts would likely be minimal.

A request was sent to ODNR to search their biodiversity database for known endangered species habitats, etc. within the project area. No records of endangered species were found in the project area. No existing or proposed nature preserves, scenic rivers, unique ecological site, geological features, breeding or non-breeding animal populations, or champion trees were identified. A copy of the ODNR letter is attached. USFWS has also commented on endangered species habitat potential by letter attached.

The jurisdictional waters delineation has been preliminarily verified by email by the Corps of Engineers dated August 30, 2011. A copy of the pre-JD and public notice email is included with this submittal.

10c). As shown on the attached site development plan (“Preferred Alternative Design) a portion of the on-site stream has been avoided and will not interfere significantly with the planned improvements. This alternative would allow a much more orderly, safe and efficient flow of pedestrian traffic through the facility and create much needed parking space. The improved area would allow vehicles to maneuver more easily to enter and exit the parking area at each end of the lot as opposed to just one way in the Minimal Design. The movement of vehicles could be accomplished more safely and efficiently with this design. Spectators would not be crossing streets and drives in their travels from other parking areas to the athletic activities.

No recurring operational and maintenance difficulties beyond those associated

with a typical parking area are anticipated under this alternative.

The construction of the softball field and additional pavement area over the proposed stream fill area would be technically feasible. Organic material would be removed and used as topsoil in the ball field area. A re-compacted non-organic engineered fill would replace the organic material. The cost of the additional paved areas would be approximately **$45,000.00** making it cost effective to eliminate safety and other operational issues.

Cost Effectiveness
Itemize the anticipated costs to construct each alternative.
Filling, grading and paving the improvement area would cost approximately **$150,000**.

Itemize the anticipated economic profits or losses for each alternative.
No anticipated economic profits from this alternative are expected.
There are no anticipated economic losses from this alternative.

Availability
Is the technology available to complete the project/alternative as proposed, or is it theoretical or unproven?
Proven technology is available to complete each of the project/alternatives as proposed.

10d). N/A

10e). No information is known that indicates this area has been targeted for water quality improvement. The site is located in a residential and commercial area of The Plains, Ohio.

10f). The costs for water pollution control under this alternative are estimated as follows:

1. Silt Fencing to protect the off site drainage of high sediment storm-water (includes installation time) – **$1,500.00**.
2. Erosion Control – **$1,200** for hydro-seeding and mulching for entire project.
3. Storm Water Management System- **$47,000.00** for whole project.

10g). Minimal impacts to human health are anticipated under this alternative.

10h). Our client states that the Preferred design could allow for proper gain regarding parking availability and traffic patterns to allow for smooth and safe flow of pedestrian traffic through the athletic field area, and would minimize safety hazards.

Include the number of jobs to be created (directly and indirectly) by the project.
It is estimated that 8 jobs will be created (directly and indirectly) by the project.

Include state and local tax revenues to be generated.
An estimated **$1,300** in combined state and local tax revenues will be generated as a result of completion of the project.

Give a brief description of the local economy (i.e. median household income, poverty rates, population growth, unemployment, etc.)
The area is located in central Athens County, Ohio. The immediate surrounding area is primarily a mixed residential and commercial area, with a few manufacturing, warehousing and transportation facilities. Beyond this, is a mix of residential, retail, educational center, agricultural land and other undeveloped land. The area is within close proximity of major highways.

Economically, the immediate area would be between the middle and lower end of Athens County economic averages.

Statistically (based upon Department of Development data, released 2010), Athens County has a median household income of $30,190 in 2010 with a poverty rate of 18.0%. Population of the county was 64,757 as of 2010; the percentage increase in population was 3.9%, 2000 to 2010. There are 21,898 households, with an average of 1.8 persons per household; there are 128.0 persons per square mile. The median value of owner-occupied housing units is $106,500; there were 25 housing units authorized by permits in 2009.

There are 1,000 private business establishments. The mean travel time to work is 20.6 minutes. The unemployment rate is 8.6% as of 2009.

Discuss the potential direct and indirect increases in property values due to the proposed project.
Based upon the history of prior development around the area, the project could potentially provide an increase in property values (and real estate taxes) both for the site property (direct) and the area surrounding the project property (indirect).

Discuss the positive impacts on the recreational and commercial opportunities of the water resource, including tourism.
The existing water resource proposed to be impacted consists of an intermittent stream corridor that occasionally dries up for periods during the drier seasons of the year. No water dependent recreational opportunities exist on the area. There appear to be no positive impacts on water oriented recreational opportunities for this alternative. Commercially, the project would allow the potential addition of up to 8 jobs and the generation of in excess of $11,000 in annual state and local tax revenue.

Discuss businesses that will be positively impacted by the proposed project.

No businesses other than the contractor performing the construction work will benefit from the proposed improvements.

Give a brief discussion regarding the positive aesthetics of the proposed project.
The steep slope and low stream valley area will be leveled to construct a playing field and parking area within an area designated as an athletic complex formerly inaccessible for sports activities. The proposed development would be the same as and tie in with the surrounding area, with similar aesthetics less the remaining stream course.

10i). The filling of 426 linear feet of intermittent stream would have slight, if any, impacts to water quality since the impacted stream would continue to drain to other surface waters in the vicinity. The water quality and functional losses of the stream impacted under this alternative would be minimal and best construction management practices would be employed.

The proposed athletic field improvements lie within an existing school campus area. Tourism use of the area is unlikely. Recreational activities would be increased, however.

Include the number of jobs to be lost (directly and indirectly) by the project.
No jobs will be lost as a result of the project.

Include state and local tax revenues to be lost.
No state and local tax revenues will be lost as a result of the project.

Discuss the potential direct and indirect lowering of property values due to the proposed project.
No direct and indirect lowering of property values are expected as a result of the proposed project.

Discuss the negative impacts on the recreational and commercial opportunities of the water resource, including tourism.
No water related recreational opportunities currently exist on the area and tourism is nil.

Discuss businesses that will be negatively impacted by the proposed project.
No businesses will be negatively impacted by the proposed project.

Give a brief discussion regarding the negative aesthetics of the proposed project.
As the proposed development would be similar to or the same as and tie in well with the surrounding area, there do not appear to be any negative aesthetics of the proposed project.

10j). Under the Preferred design alternative, no significant environmental benefits would be realized, nor would any significant environmental losses occur.

No endangered or threatened species or habitats have been identified in the improvement area. The stream proposed to be impacted is not known to support a population of migratory waterfowl. No areas would be directly impacted by this alternative that contain potential amphibian breeding grounds. Additional amphibian habitat areas, if any, downstream would be left undisturbed.

10k.) Creation of on-site stream mitigation would require excavation and additional space, as well as being placed in an active human environment like the athletic field area. There were also no areas of a nearby stream which were available for restoration. It was therefore determined that a suitable area with positive environmental impacts for on-site mitigation does not exist at this property. Efforts to create and/or restore streams are often most successful when directed toward the establishment of perpetual conservation easements on existing streams if the applicant has the resources rather than on small fragments of streams adjacent to the project site which are usually surrounded and threatened by various types of encroachment. On-site or near site (within 1 mile) compensatory mitigation would be more environmentally friendly given the proximity and non-association with a metropolitan area of the mitigation location. Also, on site mitigation would not be feasible due to the lack of potential available watershed and hydrology on the project property. Therefore, mitigation to a property within 1 mile of the project location owned by the Athens City School District and not threatened by urban encroachment, was considered the best option for the mitigation of the proposed stream loss.

Mitigation Ratios are calculated as follows:

426 linear feet (total impact) at a ratio of 1.5 to 1
426 times 1.5 = 639 linear feet of conservation easement.

The Athens City School District has agreed to permanently establish a conservation easement on streams within their 30 acre science laboratory property located less than 1 mile west of the project property. The conservation easement will be platted and filed in the Athens County Courthouse upon issuance of the permit with the regulatory specified requirements agreed upon.

TABLE
SOCIAL AND ECONOMIC JUSTIFICATION

	PREFERRED DESIGN	MINIMAL DEGRADATION DESIGN	NON-DEGRADATION DESIGN
Improvements Proposed	Softball Field and 38 Parking Spaces	Softball Field and 10 Parking Spaces	None
New Temporary Jobs	8	8	0
Estimated Payroll/Project	$24,000.00	$18,000.00	0
Estimated Payroll Taxes/Project	$7,500.00	$5,500.00	0
New Permanent Jobs	0	0	0
Est. Permanent Jobs	0	0	0
Est. Permanent Taxes	0	0	0
Other Taxes	0	0	0
Revenue Generated	0	0	0
Local Taxes Generated (Est.)	$75.00	$55.00	0
State Taxes Generated	$1,200.00	$880.00	0
Land Donated to Community (acres)	0	0	0
Royalties to ODNR for Oil and Gas Projects	0	0	0
County Unemployment Rate	8.6% in 2009	8.6% in 2009	8.6% in 2009
County Poverty Rate	18%	18%	18%
Environmental Benefit	Preserve a Wooded Stream Segment	Preserve a Wooded Stream Segment	None
Social Benefit	Create Temporary Jobs and Provide a Social Activity	Create Temporary Jobs and Provide a Social Activity	None
Recreational Benefit	Additional Playing Facilities	Additional Playing Facilities	None
OTHER			

JURISDICTIONAL WATERS DELINEATION

FOR THE

PROPOSED ATHENS HIGH SCHOOL ATHLETIC FIELD IMPROVEMENTS PROPERTY
1 HIGH SCHOOL ROAD, THE PLAINS, ATHENS COUNTY, OH

BRUCE T. POLLARD, CPG
PROJECT MANAGER

ANDREW S. PEIKEN, C.E.
PRINCIPLE CONSULTANT

PREPARED FOR

ATHENS CITY SCHOOL DISTRICT

25 SOUTH PLAINS ROAD
THE PLAINS, OH 45780

PREPARED BY

PROFESSIONAL SERVICE INDUSTRIES, INC.
4960 VULCAN AVENUE
COLUMBUS, OHIO, 43228

JUNE 13, 2011

PSI PROJECT: 0655440

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INTRODUCTION

Professional Service Industries, Inc (PSI) has completed a Delineation of Jurisdictional Waters at the proposed Athens High School improvement development property located south of the football field/track on the high school campus located at 1 High School Road, The Plains, Athens County, Ohio. The approximate 3.5-acre property observed for this delineation **(study area)** is currently a vacant mowed field with an intermittent stream flowing through it with a sloped hillside in the southwest. It is currently used mostly for recreational purposes. The delineation was performed in general accordance with the scope and limitations of the 1987 *United States Army Corps of Engineers Wetland Delineation Manual* (1987 Manual).

For the purposes of this report, the term "wetlands" is herein used to refer to areas that meet the United States Army Corps of Engineers (USACE) wetland definition without regard to being jurisdictional or isolated.

OBJECTIVE OF WETLANDS DELINEATION

The purpose of this delineation was to determine the total acres of USACE and State of Ohio wetlands and/or linear footage of jurisdictional streams that occur on the subject property. PSI examined on-site soil, vegetation, hydrology, and reviewed United States Geological Survey (USGS) maps, aerial photographs, and the Web Soil Survey of Athens County, Ohio.

Based on our site observations and record reviews, no wetlands and one jurisdictional intermittent stream are present on the proposed improvement development portion of the high school property. The intermittent stream totals 426 linear feet within the proposed improvement construction area and is in the southeastern portion along the toe of a natural slope located to the southwest. The area has been previously sparsely wooded along the stream corridor, but the trees were damaged by a tornado in September 2010 and the broken and splintered tree remnants were removed. Only stumps remain.

Based on a Huntington, WV District USACE desktop review of the stream, the stream is likely an intermittent stream under the jurisdiction of the USACE. The HHEI score was 46 indicating the stream to be a Class II intermittent stream. The stream is approximately **650 linear feet** long within the school property boundary with only a portion near the southeastern improvement study area boundary.

DESCRIPTION OF THE PROPERTY (STUDY AREA)

The proposed athletic field improvement portion of the property consists of approximately 3.5 acres of mostly grass covered mowed and maintained land. A jurisdictional intermittent stream flows near the eastern boundary and within the improvement portion of the property. Access roads and athletic facilities are in the

adjacent vicinity to the proposed improvement area. A pond is located east of the improvement area and the overflow from the pond is the beginning of the subject intermittent stream. Vegetative cover consisting of grass and weeds are in the vicinity of the stream. A sloped hillside is along the southwestern side of the stream.

The natural vegetation within the study area is associated with the previously removed wooded corridor and contains the following herbaceous vegetation species: Virginia creeper (*Pathenocissus quinquefolia*), meadow fescue (*Festuca pratensis*), Japanese honeysuckle (*Lonicera japonica*), amur honeysuckle (*Lonicera maackii*), foxglove beardtongue *(Penstemen digitalis*, dock (*Rumex crispus*), daisy fleabane (*Erigeron annuus*) and white clover (*Trifolium repens*). Based on stump characteristics, tree species in this portion of the property formerly consisted of American beech (Fagus grandifolia), white oak (*Quercus alba*), sycamore (*Platanus occidentalis*) and sugar maple (*Acer saccharum*).

DATA COLLECTION METHODOLOGY

Bruce T. Pollard, of PSI, conducted the delineation on June 7, 2011. The distribution of distinctive vegetative communities, combined with topographic and hydrologic data, were used to determine that no wetlands and one stream were within the study area limits. The stream was surveyed by RJM Engineering, Inc. and down loaded onto the attached proposed improvement property map. The stream was photographed to provide the USACE and Ohio Environmental Protection Agency (OEPA) with visual information regarding the stream characteristics, as necessary. Stream and property photographs are attached.

In the field, a Headwater Habitat Evaluation Index (HHEI) form was completed for a stream reach (200 linear feet) within the study area.

The HHEI form and photographs are attached in the appendix of this report.

PSI conducted the delineation in general accordance with the methods and procedures described in the 1987 Manual as referenced above. No other warranty, expressed or implied, is made. The specific methods used and the results of the delineation are presented in this report. We also present our conclusions within this report noting that conclusions are subject to USACE approval.

DELINEATION INVESTIGATION RESULTS

PSI performed a jurisdictional waters delineation on the proposed athletic field improvement property for the Athens High School on June 7, 2011. The purpose of the delineation was to determine the actual extent of wetland acreage or stream length or other jurisdictional waters currently present on the property. One intermittent stream totaling approximately **650 linear feet** was delineated on the school property during the field work crossing the proposed improvement area. Only 426 feet of this stream are within the proposed improvement portion of the property and proposed for impacts.

An HHEI form was completed for the stream on the property. The score as rated by PSI was **49.** With a watershed of approximately 0.12 square miles, this places the stream as a Class II PWWH intermittent stream. A copy of the completed HHEI form is appended.

CONCLUSIONS

A routine delineation of waters of the United States and of the State has been conducted. PSI, Inc. prepared this report for the property designated as the proposed Athletic Field Improvement Development Property located at the Athens High School campus in Athens County, The Plains, Ohio. The delineation was performed in accordance with the USACE 1987 delineation manual. It is the opinion of PSI that there are no wetlands and one jurisdictional intermittent stream totaling approximately **426 linear feet** within the proposed athletic field improvement area.

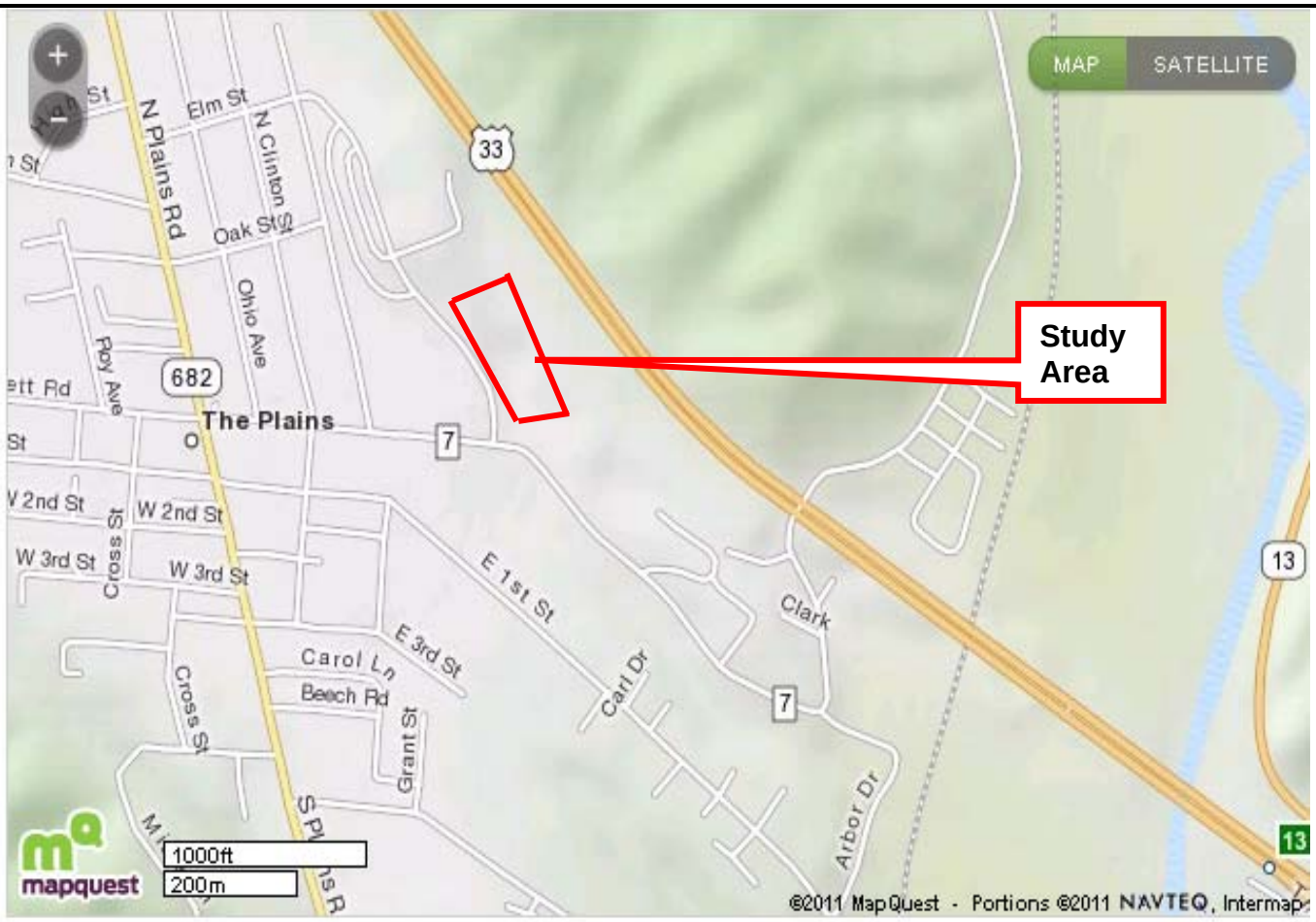
Based on the jurisdictional waters issues present on the subject property, the following permitting scenarios are available. PSI understands that 426 linear feet of the jurisdictional stream are within the proposed improvement area and will cause the filling of 426 linear feet of the stream. An Individual 401/404 Permit (IP) will be required to impact this length of stream.

Requesting a permit from the Federal Government automatically triggers the Historic Preservation Act and the Endangered Species Act. Because of this, a cultural resources archeological investigation and an endangered species habitat survey will be necessary to be performed on the property in conjunction with the application for the federal NWP. These initial studies may lead to more extensive and more costly surveys regarding specific cultural resources if likely to be found on the property or specific endangered species if likely to inhabit the property.

Permitting for this IP can take up to 4 and 12 months to acquire from initial permit submittal. The above studies would require completion before the federal permit application is acceptable for submittal. This would likely delay the project and securing the permit requested is never guaranteed.

PSI appreciates the opportunity to serve you on this project. Please call our office with questions you may have concerning the information presented in this report.

APPENDIX A – FIGURES



N

psi Information To Build On
Engineering • Consulting • Testing

Study Area Location Map
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

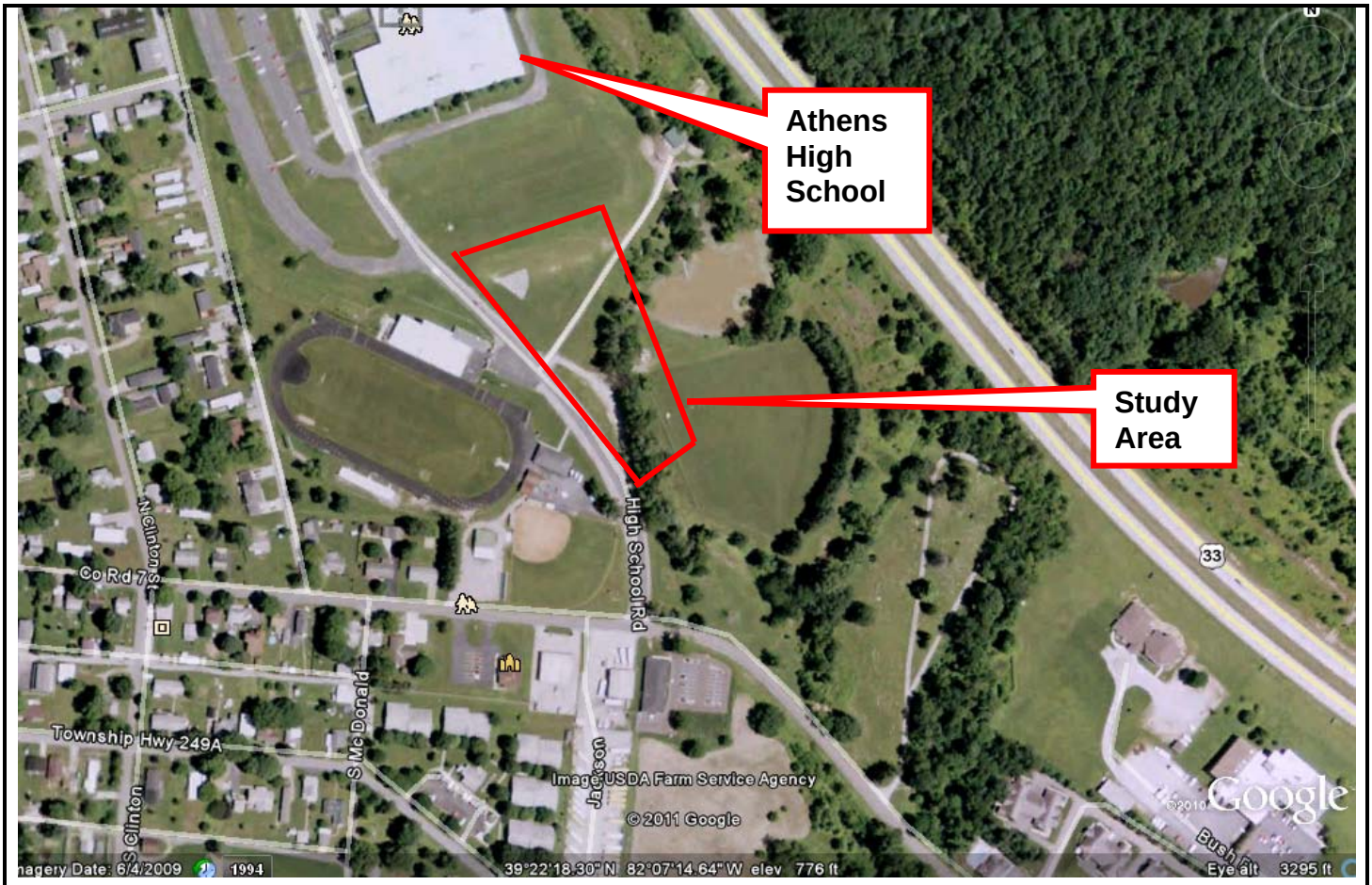
PREPARED FOR: Athens City Schools

DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP



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psi Information To Build On
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2009 Aerial Photograph of Property/Study Area
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

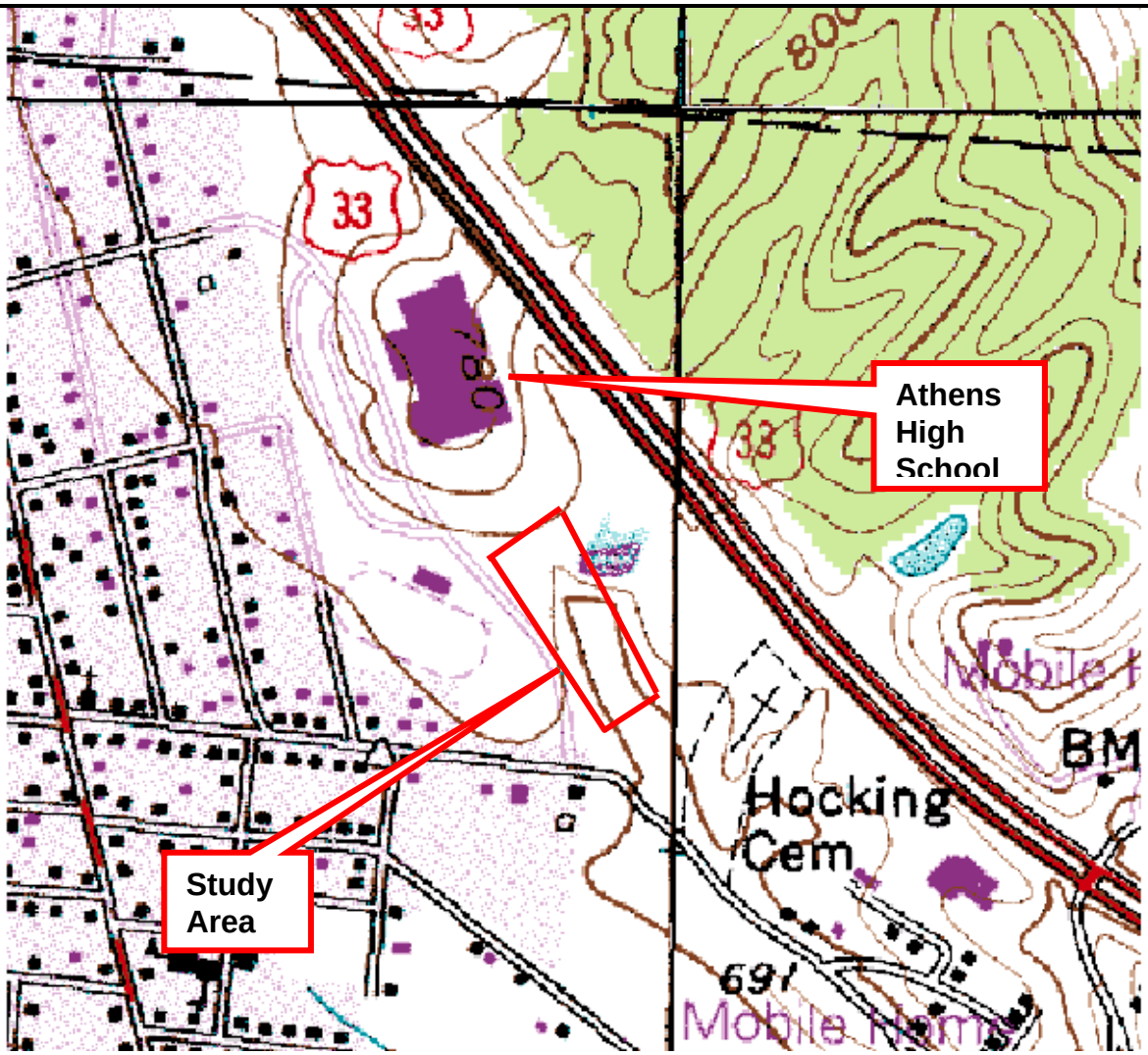
PREPARED FOR: Athens City Schools

PROJECT MANAGER: Bruce T. Pollard

DRAWN BY: BTP

DATE: 6/9/2011

PROJECT NO: 0655440



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Topographic Map
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

PREPARED FOR: Athens City Schools

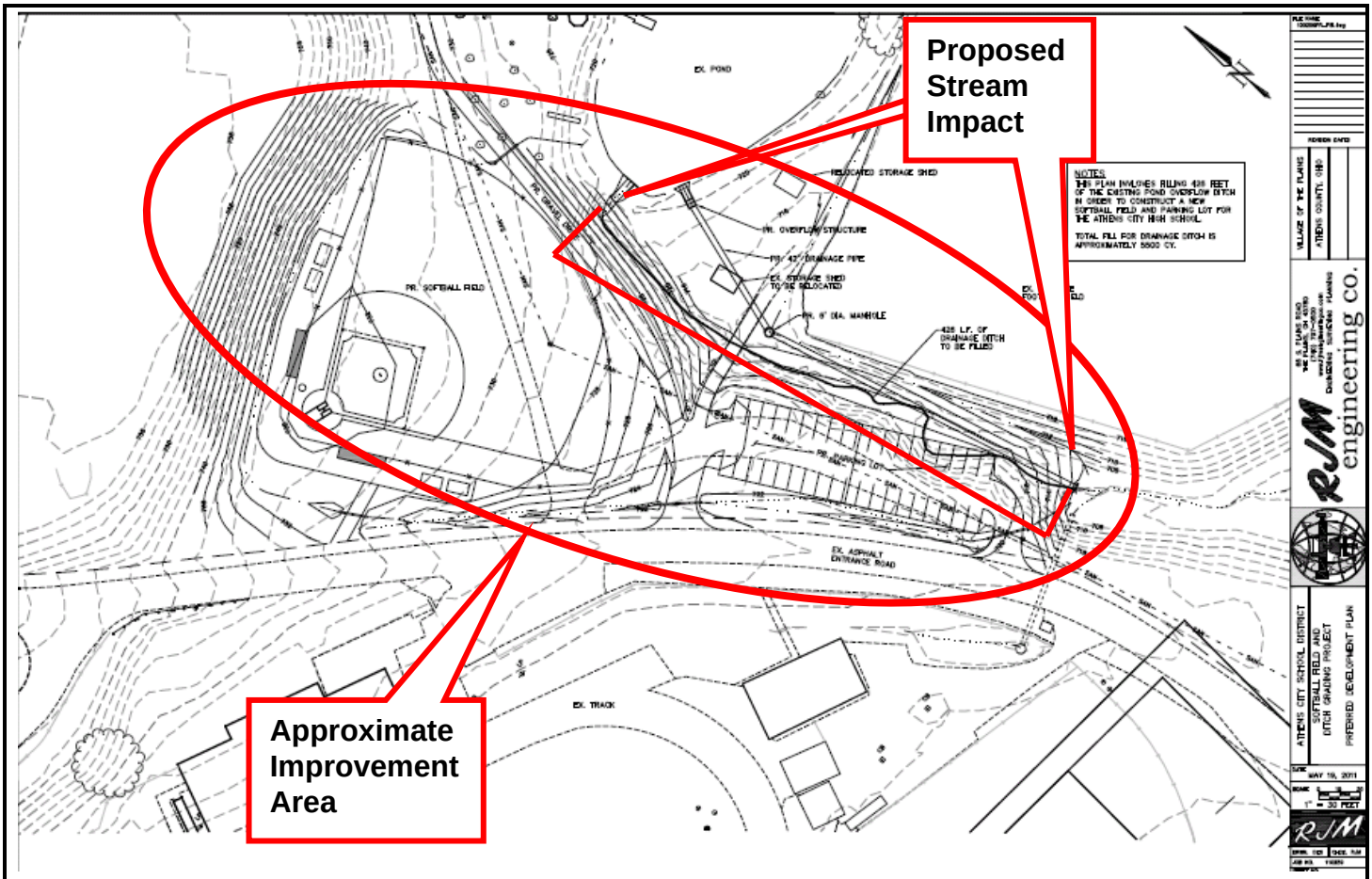
DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP

APPENDIX B – SITE DEVELOPMENT PLAN WITH STREAM LOCATION



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Improvement/Study Area with Photo Locations
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

psi Information To Build On
Engineering • Consulting • Testing

PREPARED FOR: Athens City Schools

PROJECT MANAGER: Bruce T. Pollard

DRAWN BY: BTP

DATE: 6/9/2011

PROJECT NO: 0655440

APPENDIX C – PROPERTY PHOTOGRAPHS – 5 PAGES

Photo #1: View of the stream just below the pond spillway (in background) looking north.

Photo #2: View of the stream south of the previous photo location looking south.

Photo #3: View of the pond and portion of the spillway that feeds the intermittent stream.

Photo #4: View of stream just north of the existing drive crossing looking south.

Photo #5: View of the stream south of the existing drive crossing looking north.

Photo #6: View of stream near the southern end of the improvement area looking south.

Photo #7: Another view further south looking south.

Photo #8: View of typical substrate of stream.

Photo #9: View of the south end of proposed impacts looking south.

Photo #10: View of the south end of the impact area looking north.

APPENDIX D – OEPA STREAM HHEI FORM (2 PAGES)

Ohio EPA Primary Headwater Habitat Evaluation Form

HHEI Score (sum of metrics 1, 2, 3) : 49

SITE NAME/LOCATION: Athens High School Athletic Field Improvemnets

SITE NUMBER: | RIVER BASIN: | DRAINAGE AREA (mi²): 0.12

LENGTH OF STREAM REACH (ft): 200 | LAT. 39.37021 | LONG. -82.12632 | RIVER CODE: | RIVER MILE:

DATE: 06/07/11 | SCORER: Bruce Polli | COMMENTS: Scoring was immediately after a 1/2" rain

NOTE: Complete All Items On This Form - Refer to "Field Evaluation Manual for Ohio's PHWH Streams" for Instructions

STREAM CHANNEL MODIFICATIONS: ☑ NONE / NATURAL CHANNEL ☐ RECOVERED ☐ RECOVERING ☐ RECENT OR NO RECOVERY

1. SUBSTRATE (Estimate percent of every type of substrate present. Check *ONLY* two predominant substrate *TYPE* boxes (Max of 32). Add total number of significant substrate types found (Max of 8). Final metric score is sum of boxes A & B.

TYPE		PERCENT	TYPE		PERCENT
☐☐	BLDR SLABS [16 pts]	0%	☑☐	SILT [3 pt]	30%
☐☐	BOULDER (>256 mm) [16 pts]	0%	☐☐	LEAF PACK/WOODY DEBRIS [3 pts]	10%
☐☐	BEDROCK [16 pt]	0%	☐☐	FINE DETRITUS [3 pts]	0%
☐☐	COBBLE (65-256 mm) [12 pts]	0%	☐☑	CLAY or HARDPAN [0 pt]	50%
☐☐	GRAVEL (2-64 mm) [9 pts]	3%	☐☐	MUCK [0 pts]	0%
☐☐	SAND (<2 mm) [6 pts]	3%	☐☐	ARTIFICIAL [3 pts]	4%

Total of Percentages of Bldr Slabs, Boulder, Cobble, Bedrock: 0.00% (A) 100% (B)

SCORE OF TWO MOST PREDOMINATE SUBSTRATE TYPES: 3 **TOTAL NUMBER OF SUBSTRATE TYPES:** 6

HHEI Metric Points

Substrate Max = 40: 9

A + B

2. Maximum Pool Depth ***(Measure the maximum pool depth within the 61 meter (200 ft)*** evaluation reach at the time of evaluation. Avoid plunge pools from road culverts or storm water pipes) (Check *ONLY* one box):

- ☐ > 30 centimeters [20 pts]
- ☐ > 22.5 - 30 cm [30 pts]
- ☑ > 10 - 22.5 cm [25 pts]
- ☐ > 5 cm - 10 cm [15 pts]
- ☐ < 5 cm [5 pts]
- ☐ NO WATER OR MOIST CHANNEL [0 pts]

COMMENTS: Immediately after a rain as stated above **MAXIMUM POOL DEPTH (centimeters):** 15

Pool Depth Max = 30: 25

3. BANK FULL WIDTH (Measured as the average of 3-4 measurements) (Check *ONLY* one box):

- ☐ > 4.0 meters (> 13') [30 pts]
- ☐ > 3.0 m - 4.0 m (> 9' 7" - 13') [25 pts]
- ☐ > 1.5 m - 3.0 m (> 9' 7" - 4' 8") [20 pts]
- ☑ > 1.0 m - 1.5 m (> 3' 3" - 4' 8") [15 pts]
- ☐ ≤ 1.0 m (<=3' 3") [5 pts]

COMMENTS: **AVERAGE BANKFULL WIDTH (meters):** 1.20

Bankfull Width Max=30: 15

This information must also be completed

RIPARIAN ZONE AND FLOODPLAIN QUALITY ☆NOTE: River Left (L) and Right (R) as looking downstream☆

RIPARIAN WIDTH L	R	(Per Bank)	FLOODPLAIN QUALITY L	R	(Most Predominant per Bank)	L	R	
☐	☐	Wide >10m	☐	☐	Mature Forest, Wetland	☐	☐	Conservation Tillage
☐	☐	Moderate 5-10m	☐	☐	Immature Forest, Shrub or Old Field	☐	☐	Urban or Industrial
☑	☑	Narrow <5m	☑	☑	Residential, Park, New Field	☐	☐	Open Pasture, Row Crop
☐	☐	None	☐	☐	Fenced Pasture	☐	☐	Mining or Construction

COMMENTS:

FLOW REGIME *(At Time of Evaluation)* (Check *ONLY* one box):

- ☑ Stream Flowing
- ☐ Subsurface flow with isolated pools (Interstitial)
- ☐ Moist Channel, isolated pools, no flow (Intermittent)
- ☐ Dry channel, no water (Ephemeral)

COMMENTS: Slow Flow - Immediately after a rain

SINUOSITY (Number of bends per 61 m (200 ft) of channel) (Check *ONLY* one box):

- ☐ None
- ☐ 0.5
- ☐ 1.0
- ☐ 1.5
- ☐ 2.0
- ☐ 2.5
- ☐ 3.0
- ☑ >3

STREAM GRADIENT ESTIMATE

☐ Flat (0.5 ft/100 ft) ☑ Flat to Moderate ☐ Moderate (2 ft/100 ft) ☐ Moderate to Severe ☐ Severe (10 ft/100 ft)

ADDITIONAL STREAM INFORMATION (This Information Must Also be Completed):

QHEI PERFORMED? ☐ Yes ☑ No QHEI Score _____ (If Yes, Attach Completed QHEI Form)

DOWNSTREAM DESIGNATED USE(S)

☐ WWH Name: **Hocking River** Distance from Evaluated Stream **1.10**

☐ CWH Name: _____ Distance from Evaluated Stream _____

☐ EWH Name: _____ Distance from Evaluated Stream _____

MAPPING: ATTACH COPIES OF MAPS, INCLUDING THE ENTIRE WATERSHED AREA. CLEARLY MARK THE SITE LOCATION

USGS Quadrangle Name: **Athens, The Plains, Nelsonville and Ja** NRCS Soil Map Page: **30** NRCS Soil Map Stream Order _____

County: **Athens** Township / City: **The Plains**

MISCELLANEOUS

Base Flow Conditions? (Y/N): **N** Date of last precipitation: **06/07/11** Quantity: **0.50**

Photograph Information: **See Delineation report**

Elevated Turbidity? (Y/N): **Y** Canopy (% open): **100%**

Were samples collected for water chemistry? (Y/N): **N** (Note lab sample no. or id. and attach results) Lab Number: _____

Field Measures: Temp (°C)_____ Dissolved Oxygen (mg/l) _____ pH (S.U.) _____ Conductivity (µmhos/cm) _____

Is the sampling reach representative of the stream (Y/N) **Y** If not, please explain: _____

Additional comments/description of pollution impacts: _____

BIOTIC EVALUATION

Performed? (Y/N): **N** (If Yes, Record all observations. Voucher collections optional. NOTE: all voucher samples must be labeled with the site ID number. Include appropriate field data sheets from the Primary Headwater Habitat Assessment Manual)

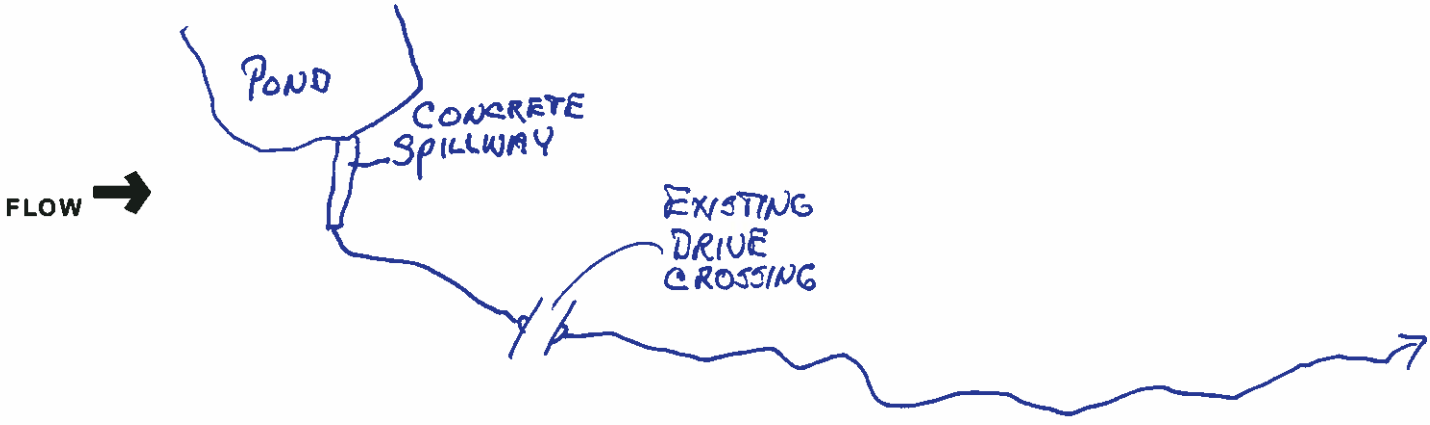
Fish Observed? (Y/N) **N** Voucher? (Y/N) **Y** Salamanders Observed? (Y/N) **N** Voucher? (Y/N) **Y**

Frogs or Tadpoles Observed? (Y/N) **N** Voucher? (Y/N) **Y** Aquatic Macroinvertebrates Observed? (Y/N) **N** Voucher? (Y/N) **Y**

Comments Regarding Biology: _____

DRAWING AND NARRATIVE DESCRIPTION OF STREAM REACH (This must be completed):

Include important landmarks and other features of interest for site evaluation and a narrative description of the stream's location



Save as pdf Reset Form

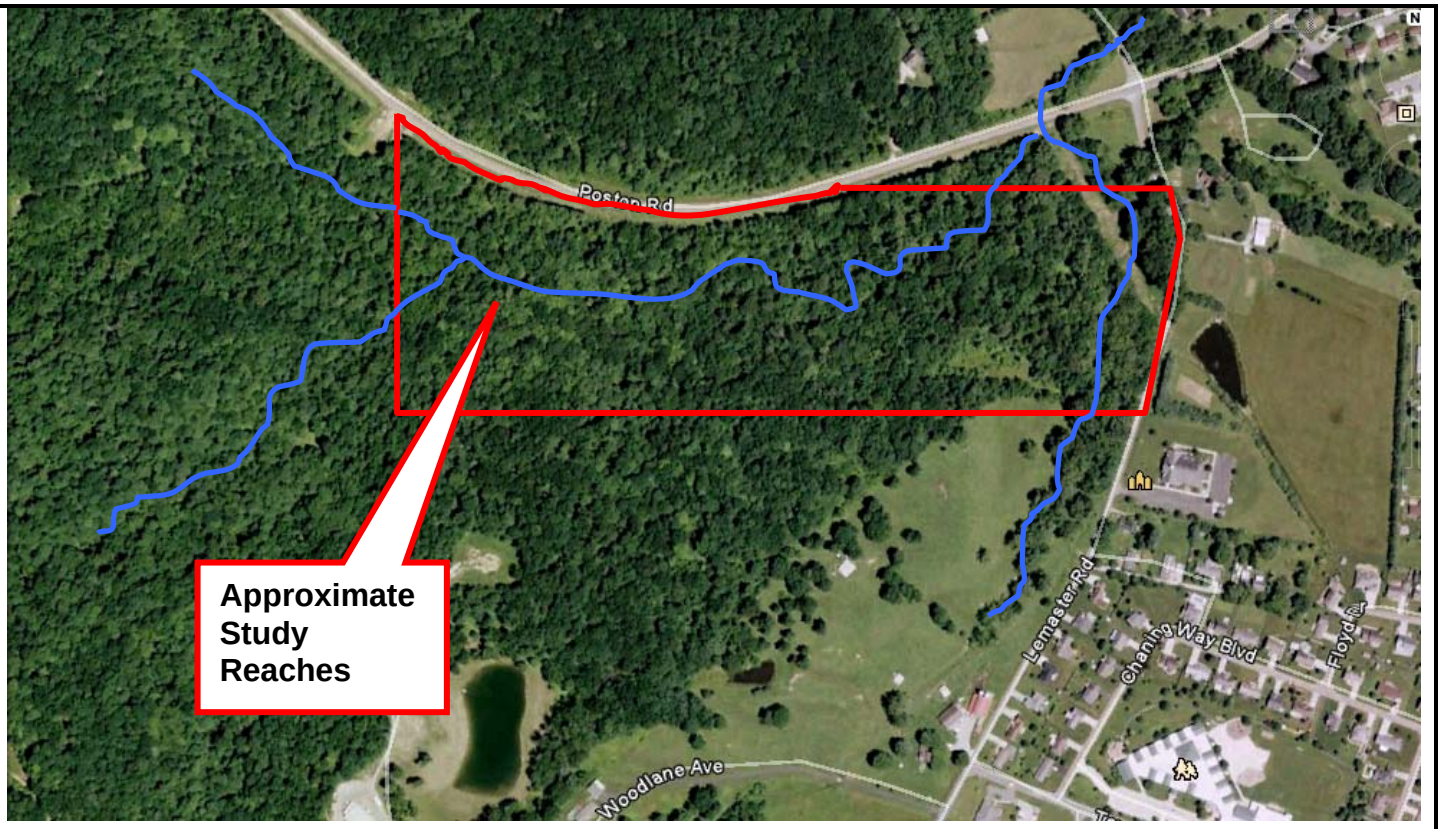
MITIGATION PROPOSAL

The Athens High School stream impacts will be mitigated to the stream in the attached photographs. The stream is on Athens School District property used currently as their field eco-lab. It is completely forested in the vicinity of the stream reaches studied for the proposed conservation easement. There are two 200 foot reaches represented by the enclosed pictures as is shown on attached mapping.

The Athens High School proposes a 1.5 : 1 ratio for mitigation which would put 639 linear feet of this stream with applicable buffer into a conservation easement with the preferred alternative design or 330 linear feet with the minimal degradation alternative. PSI scored the stream to be impacted at 49 and the mitigation stream at 71 on HHEI evaluation forms. The HHEI form for the mitigated stream reaches evaluated is attached for reference. The impacted stream HHEI form is in the delineation report in another section of this submittal. The approximate 30 acre property where the mitigation stream is located is owned by the Athens School District and is forested with the proposed mitigation stream crossing from east to west. The extreme western portion east of the unnamed tributary stream confluence will be used for mitigation as can be seen from the enclosed aerial location map.

The impacted stream has an approximate 0.3 square mile watershed at the downstream end of the proposed impact and the mitigation stream has a 0.77 to 0.80 square mile watershed at the vicinity of each of the two 200 foot reaches evaluated.

The Athens City School District has agreed to permanently establish a conservation easement and buffer on streams within their 30 acre science laboratory property located approximately 1 mile west of the project property. The conservation easement and buffers will be surveyed, platted and filed in the Athens County Courthouse upon issuance of the permit with the regulatory specified requirements agreed upon and permanently deed restricted.



N

psi Information To Build On
Engineering • Consulting • Testing

Proposed Mitigation Stream Location Map
Proposed Athens High School Athletic Field Improvements
Athens County, The Plains, Ohio

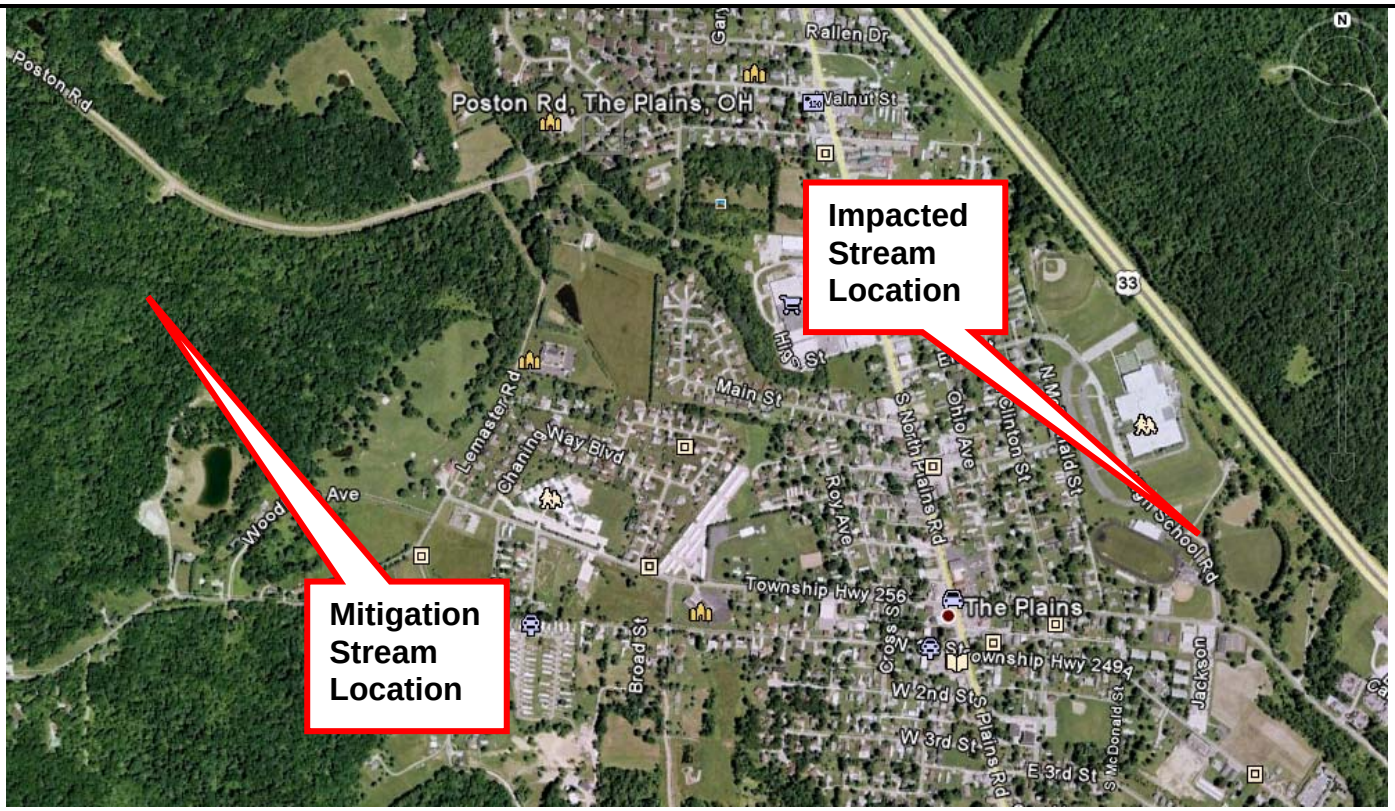
PREPARED FOR: Athens City Schools

DATE: 7/14/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP



N

psi Information To Build On Engineering • Consulting • Testing	**Impacted Stream and Mitigation Stream Location Comparison** **Proposed Athens High School Improvements** **Athens County, The Plains, Ohio**
PREPARED FOR: Athens School District **PROJECT MANAGER:** Bruce T. Pollard **DRAWN BY:** BTP	**DATE:** 7/15/2011 **PROJECT NO:** 0655440

Ohio EPA Primary Headwater Habitat Evaluation Form

HHEI Score (sum of metrics 1, 2, 3) : 71

SITE NAME/LOCATION: Proposed Mitigation Stream for Athens High School Improvements Impacts

SITE NUMBER: _____ RIVER BASIN: _____ DRAINAGE AREA (mi²): 0.77

LENGTH OF STREAM REACH (ft): 200 LAT. 39.37520 LONG. -82.14928 RIVER CODE: _____ RIVER MILE: _____

DATE: 07/12/11 SCORER: BTP COMMENTS: Scoring was 24 hours after a moderate rain

NOTE: Complete All Items On This Form - Refer to "Field Evaluation Manual for Ohio's PHWH Streams" for Instructions

STREAM CHANNEL MODIFICATIONS: ☑ NONE / NATURAL CHANNEL ☐ RECOVERED ☐ RECOVERING ☐ RECENT OR NO RECOVERY

1. **SUBSTRATE (Estimate percent of every type of substrate present.** Check *ONLY* two predominant substrate *TYPE* boxes (Max of 32). Add total number of significant substrate types found (Max of 8). Final metric score is sum of boxes A & B.

TYPE		PERCENT	TYPE		PERCENT
☐ ☐	BLDR SLABS [16 pts]	0%	☐ ☐	SILT [3 pt]	10%
☐ ☐	BOULDER (>256 mm) [16 pts]	0%	☐ ☐	LEAF PACK/WOODY DEBRIS [3 pts]	5%
☐ ☐	BEDROCK [16 pt]	0%	☐ ☐	FINE DETRITUS [3 pts]	5%
☐ ☐	COBBLE (65-256 mm) [12 pts]	0%	☐ ☐	CLAY or HARDPAN [0 pt]	5%
☑ ☐	GRAVEL (2-64 mm) [9 pts]	60%	☐ ☐	MUCK [0 pts]	0%
☐ ☑	SAND (<2 mm) [6 pts]	15%	☐ ☐	ARTIFICIAL [3 pts]	0%

Total of Percentages of Bldr Slabs, Boulder, Cobble, Bedrock: 0.00% (A) 100% (B)

SCORE OF TWO MOST PREDOMINATE SUBSTRATE TYPES: 15 **TOTAL NUMBER OF SUBSTRATE TYPES:** 6

HHEI Metric Points

Substrate Max = 40: 21

A + B

2. **Maximum Pool Depth** ***(Measure the maximum pool depth within the 61 meter (200 ft)*** evaluation reach at the time of evaluation. Avoid plunge pools from road culverts or storm water pipes) (Check *ONLY* one box):

- ☑ > 30 centimeters [20 pts]
- ☐ > 22.5 - 30 cm [30 pts]
- ☐ > 10 - 22.5 cm [25 pts]
- ☐ > 5 cm - 10 cm [15 pts]
- ☐ < 5 cm [5 pts]
- ☐ NO WATER OR MOIST CHANNEL [0 pts]

COMMENTS: _____ **MAXIMUM POOL DEPTH (centimeters):** 35

Pool Depth Max = 30: 20

3. **BANK FULL WIDTH (Measured as the average of 3-4 measurements)** **(Check *ONLY* one box):**

- ☑ > 4.0 meters (> 13') [30 pts]
- ☐ > 3.0 m - 4.0 m (> 9' 7" - 13') [25 pts]
- ☐ > 1.5 m - 3.0 m (> 9' 7" - 4' 8") [20 pts]
- ☐ > 1.0 m - 1.5 m (> 3' 3" - 4' 8") [15 pts]
- ☐ ≤ 1.0 m (<=3' 3") [5 pts]

COMMENTS: _____ **AVERAGE BANKFULL WIDTH (meters):** 15.00

Bankfull Width Max=30: 30

This information must also be completed

RIPARIAN ZONE AND FLOODPLAIN QUALITY ☆NOTE: River Left (L) and Right (R) as looking downstream☆

RIPARIAN WIDTH (Per Bank) L R	FLOODPLAIN QUALITY (Most Predominant per Bank) L R	L R
☑ ☑ Wide >10m	☑ ☑ Mature Forest, Wetland	☐ ☐ Conservation Tillage
☐ ☐ Moderate 5-10m	☐ ☐ Immature Forest, Shrub or Old Field	☐ ☐ Urban or Industrial
☐ ☐ Narrow <5m	☐ ☐ Residential, Park, New Field	☐ ☐ Open Pasture, Row Crop
☐ ☐ None	☐ ☐ Fenced Pasture	☐ ☐ Mining or Construction

COMMENTS: _____

FLOW REGIME *(At Time of Evaluation)* (Check *ONLY* one box):

- ☑ Stream Flowing
- ☐ Subsurface flow with isolated pools (Interstitial)
- ☐ Moist Channel, isolated pools, no flow (Intermittent)
- ☐ Dry channel, no water (Ephemeral)

COMMENTS: _____

SINUOSITY (Number of bends per 61 m (200 ft) of channel) (Check *ONLY* one box):

- ☐ None
- ☐ 0.5
- ☑ 1.0
- ☐ 1.5
- ☐ 2.0
- ☐ 2.5
- ☐ 3.0
- ☐ >3

STREAM GRADIENT ESTIMATE

☐ Flat (0.5 ft/100 ft) ☐ Flat to Moderate ☑ Moderate (2 ft/100 ft) ☐ Moderate to Severe ☐ Severe (10 ft/100 ft)

ADDITIONAL STREAM INFORMATION (This Information Must Also be Completed):

QHEI PERFORMED? ☐ Yes ☑ No QHEI Score _____ (If Yes, Attach Completed QHEI Form)

DOWNSTREAM DESIGNATED USE(S)

☐ WWH Name: _____ Distance from Evaluated Stream _____

☐ CWH Name: _____ Distance from Evaluated Stream _____

☐ EWH Name: _____ Distance from Evaluated Stream _____

MAPPING: ATTACH COPIES OF MAPS, INCLUDING THE ENTIRE WATERSHED AREA. CLEARLY MARK THE SITE LOCATION

USGS Quadrangle Name: **Athens, The Plains** NRCS Soil Map Page: **30** NRCS Soil Map Stream Order _____

County: **Athens** Township / City: **The Plains**

MISCELLANEOUS

Base Flow Conditions? (Y/N): **N** Date of last precipitation: **07/11/11** Quantity: **0.50**

Photograph Information: **See attached info.**

Elevated Turbidity? (Y/N): **Y** Canopy (% open): **15%**

Were samples collected for water chemistry? (Y/N): **N** (Note lab sample no. or id. and attach results) Lab Number: _____

Field Measures: Temp (°C)_____ Dissolved Oxygen (mg/l) _____ pH (S.U.) _____ Conductivity (µmhos/cm) _____

Is the sampling reach representative of the stream (Y/N) **Y** If not, please explain: _____

Additional comments/description of pollution impacts: _____

BIOTIC EVALUATION

Performed? (Y/N): **N** (If Yes, Record all observations. Voucher collections optional. NOTE: all voucher samples must be labeled with the site ID number. Include appropriate field data sheets from the Primary Headwater Habitat Assessment Manual)

Fish Observed? (Y/N) **N** Voucher? (Y/N) **Y** Salamanders Observed? (Y/N) **N** Voucher? (Y/N) **Y**

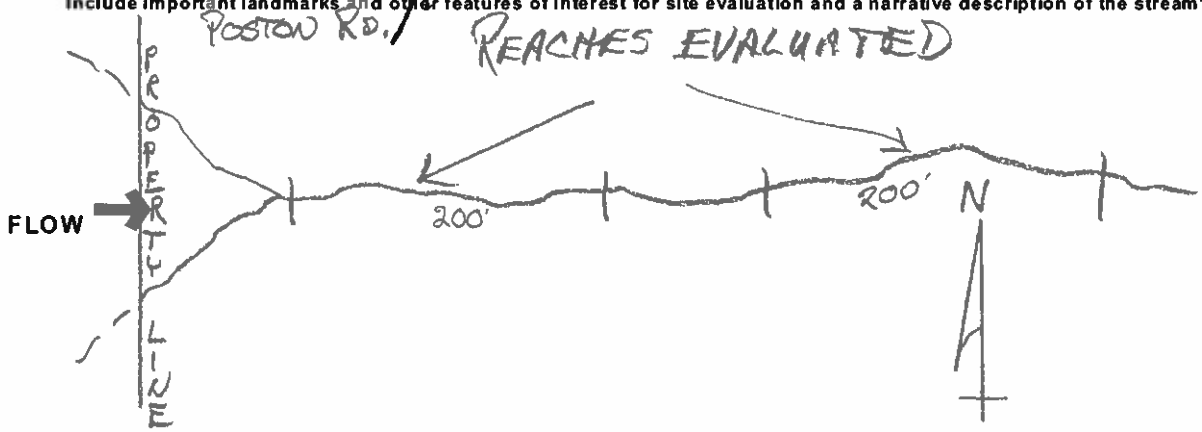
Frogs or Tadpoles Observed? (Y/N) **Y** Voucher? (Y/N) **Y** Aquatic Macroinvertebrates Observed? (Y/N) **Y** Voucher? (Y/N) **Y**

Comments Regarding Biology: _____

Water was moderately turbid form the recent rain and fish and insect larvae were not observed but likely present.

DRAWING AND NARRATIVE DESCRIPTION OF STREAM REACH (This must be completed):

Include important landmarks and other features of interest for site evaluation and a narrative description of the stream's location



October 24, 2002 Revision

Save as pdf Reset Form

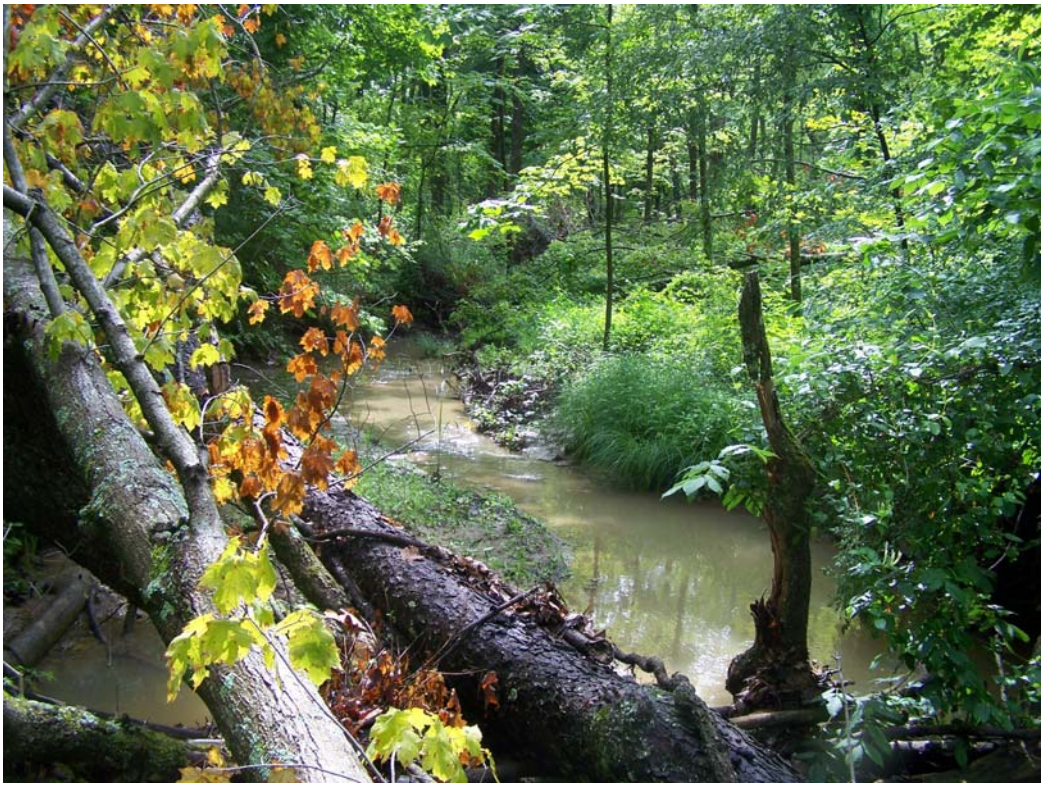
psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11



psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

psi Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

Information To Build On Engineering • Consulting • Testing	Mitigation Stream for Athens High School Poston and Lemaster Roads, The Plains, OH	PSI Project #: 0655440	Date: 7/12/11

Information To Build On
Engineering • Consulting • Testing

June 23, 2011

Ohio Department of Natural Resources
Division of Wildlife
Ohio Biodiversity Database Program
2045 Morse Road, Bldg. G-3
Columbus, OH 43229-6693

FAX: 614-267-3096

Re: Individual 401/404 Permit Application Requirement
Proposed Athens High School Athletic Field Improvements Property
1 High School Road
The Plains, Ohio 45780

Dear Database Reviewer:

Professional Service Industries, Inc. (PSI) is completing a Level I Isolated Wetland Permit Application for the above-mentioned property. The Athens City Schools will be constructing improvements to their athletic fields on the subject property. A portion of The Plains 7.5 minute USGS topographic quadrangle map is enclosed with the subject property and area of concern indicated. As a portion of the USACE and OEPA information required for the permit application submittal, PSI is requesting a review of your database for any information on this site regarding:

Critical Habitat
State of Federal Threatened or Endangered Species
High Quality Wetlands
Significant breeding/non-breeding bird concentration areas
Natural Areas and Preserves, and
Any other database information for the subject property

PSI appreciates you taking the time to respond to this request. Please contact me at (614) 876-8000 or by e-mail at bruce.pollard@psiusa.com if you have any questions concerning this request.

Respectfully submitted,

PROFESSIONAL SERVICE INDUSTRIES, INC.

Bruce T. Pollard, CPG(IN), EP
Project Manager

DATA REQUEST FORM

OHIO DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
OHIO BIODIVERSITY DATABASE PROGRAM
2045 MORSE RD., BLDG. G-3
COLUMBUS, OHIO 43229-6693
PHONE: 614-265-6452; FAX: 614-267-3096

INSTRUCTIONS:
Please complete both sides of this form, sign and return it to the address or fax number given above along with: **(1)** a brief letter describing your project, and **(2)** a map detailing the boundaries of your project site. A copy of the pertinent portion of a USGS 7.5 minute topographic map is preferred but other maps are acceptable. Our turnaround time is two weeks, although we can often respond more quickly. If you fax in your request you do not need to mail the original unless otherwise requested.

FEES:
As of June 2010, we have temporarily suspended charging a fee until a review of the data request process has been completed.

WHAT WE PROVIDE: The Biodiversity Database is the most comprehensive source of information on the location of Ohio's rare species and significant natural features. Records for the following will be provided: plants and animals (state and federal listed species), high quality plant communities, geologic features, breeding animal concentrations and unprotected significant natural areas. We also provide locations for managed areas including federal, state, county, local and non-profit sites, as well as state and national scenic rivers. A minimum one mile radius around the project site will automatically be searched. Because the data is sensitive information, it is our policy to provide only the data needed to complete your project.

****

Date: 6-23-2011 Company name: PSI

Name of person response letter should be addressed to: Mr. ☒ Ms. ☐
BRUCE T. POLLARD

Address: 4960 VULCAN AVE.

City/State/Zip: COLUMBUS, OH 43228

Phone 614-876-8000 x23 Fax: 614-876-0548

E-mail address: bruce.pollard@psiusa.com

Project Name: ATHENS HIGH SCHOOL

Project Number: 0655440

Project Site Address: 1 HIGH SCHOOL RD., THE PLAINS, OH 45780

Project County: ATHENS

Project City/Township: THE PLAINS

Project site is located on the following USGS 7.5 minute topographic quad(s): THE PLAINS

Description of work to be performed at the project site: 426 FEET OF INTERMITTENT STREAM WILL BE FILLED TO CONSTRUCT A SOFTBALL FIELD + PARKING LOT.

How do you want your data reported? (Both formats provide exactly the same data. The only difference is in the format of our response. The manual search is most appropriate for small scale projects or for those who do not have GIS capabilities. Please choose only one option.)

Printed list and map (manual search) ✓ **OR** GIS shapefile (computer search) _____

Additional information you require: _____

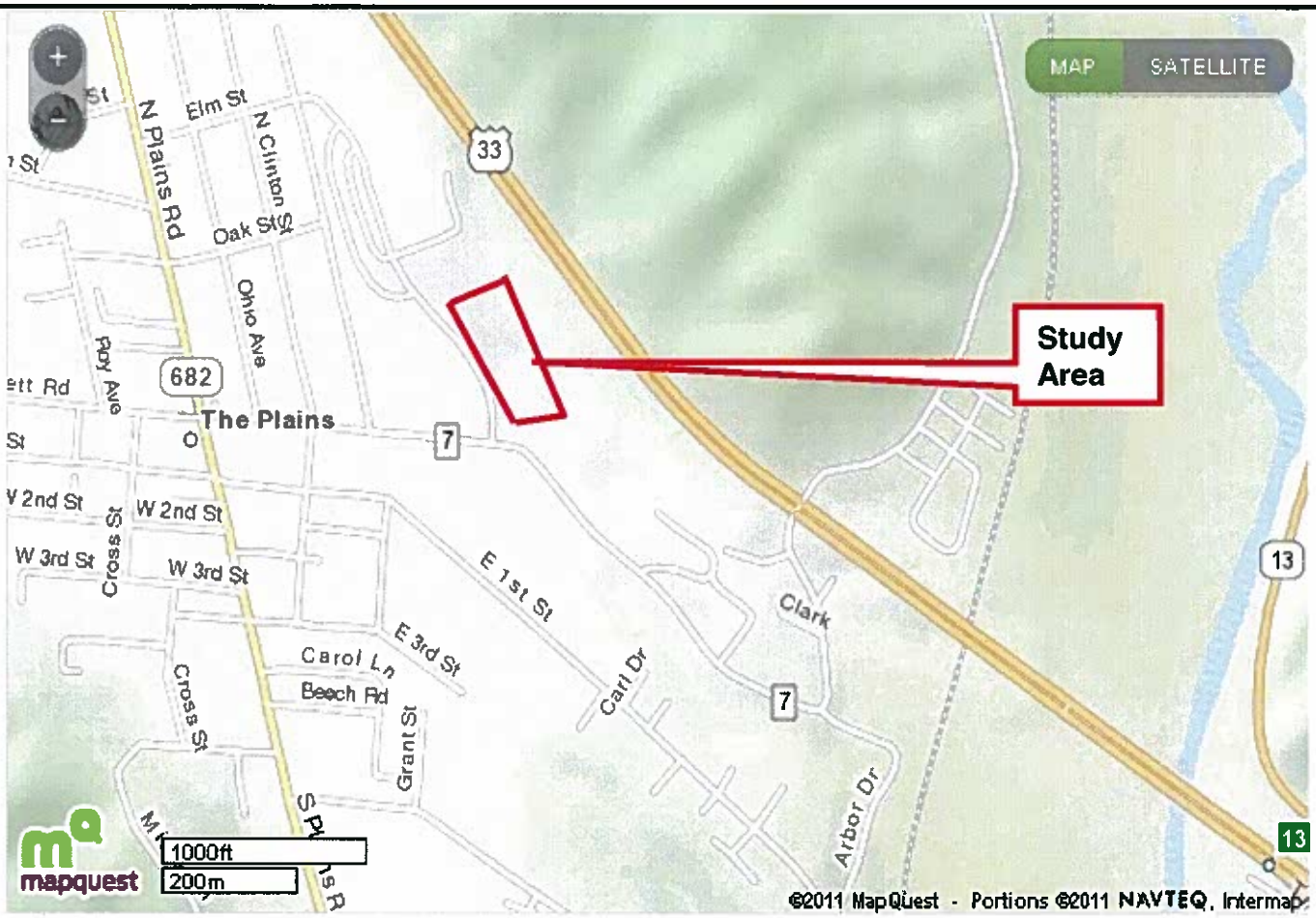
How will the information be used? SUPPLEMENTAL TO INDIVIDUAL PERMIT APPLICATION

I certify that data supplied by the Ohio Biodiversity Database Program will not be published without crediting the ODNR Division of Wildlife as the source of the material. In addition, I certify that electronic datasets will not be distributed to others without the consent of the Division of Wildlife, Ohio Biodiversity Program.

Signature Bruce D. Tallard

Date: 6-23-2011

DNR 5203
REV 8/2010



psi Information To Build On
Engineering • Consulting • Testing

Study Area Location Map
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

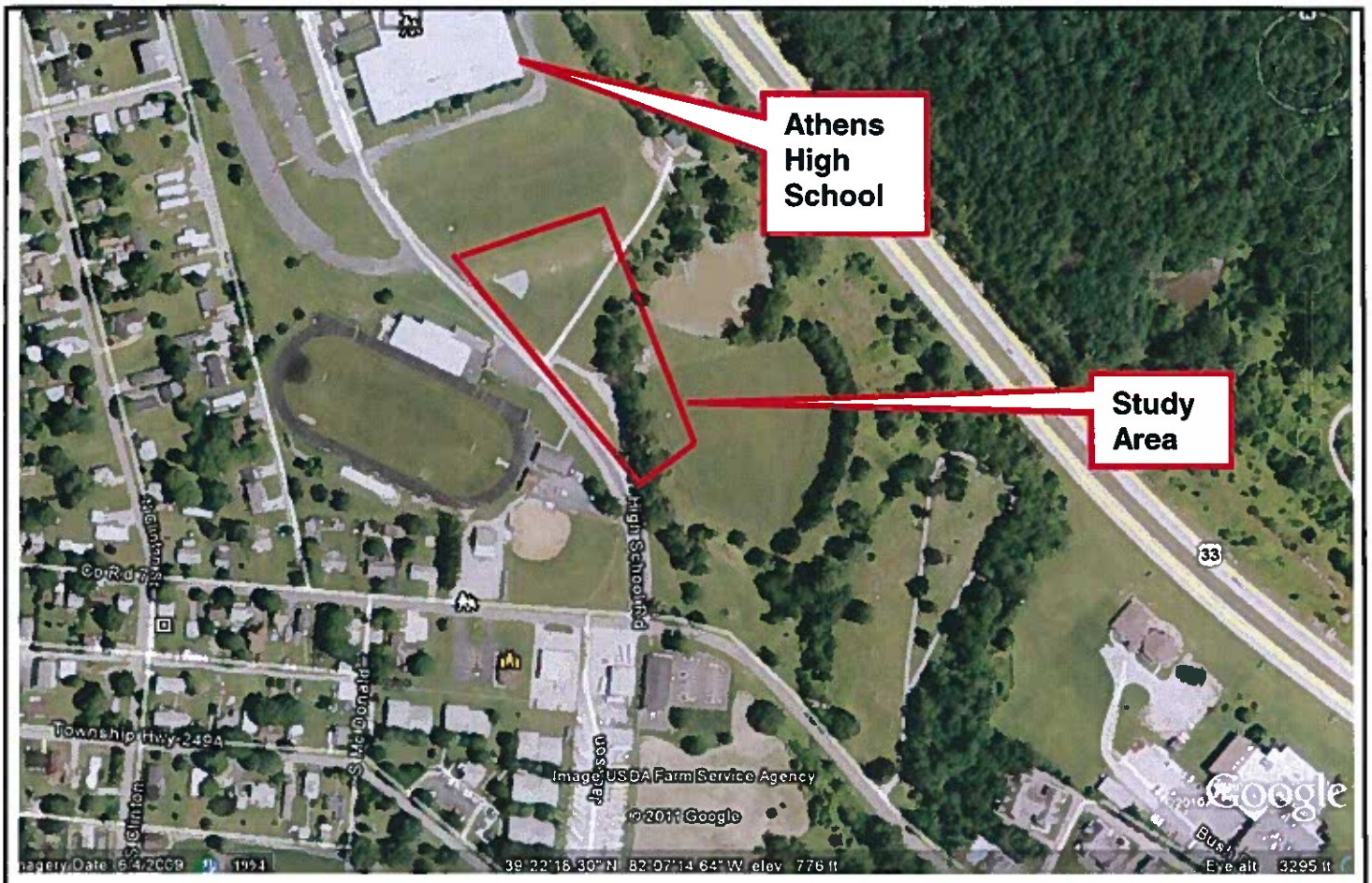
PREPARED FOR: Athens City Schools

PROJECT MANAGER: Bruce T. Pollard

DRAWN BY: BTP

DATE: 6/9/2011

PROJECT NO: 0655440



N

2009 Aerial Photograph of Property/Study Area
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

psi Information To Build On
Engineering • Consulting • Testing

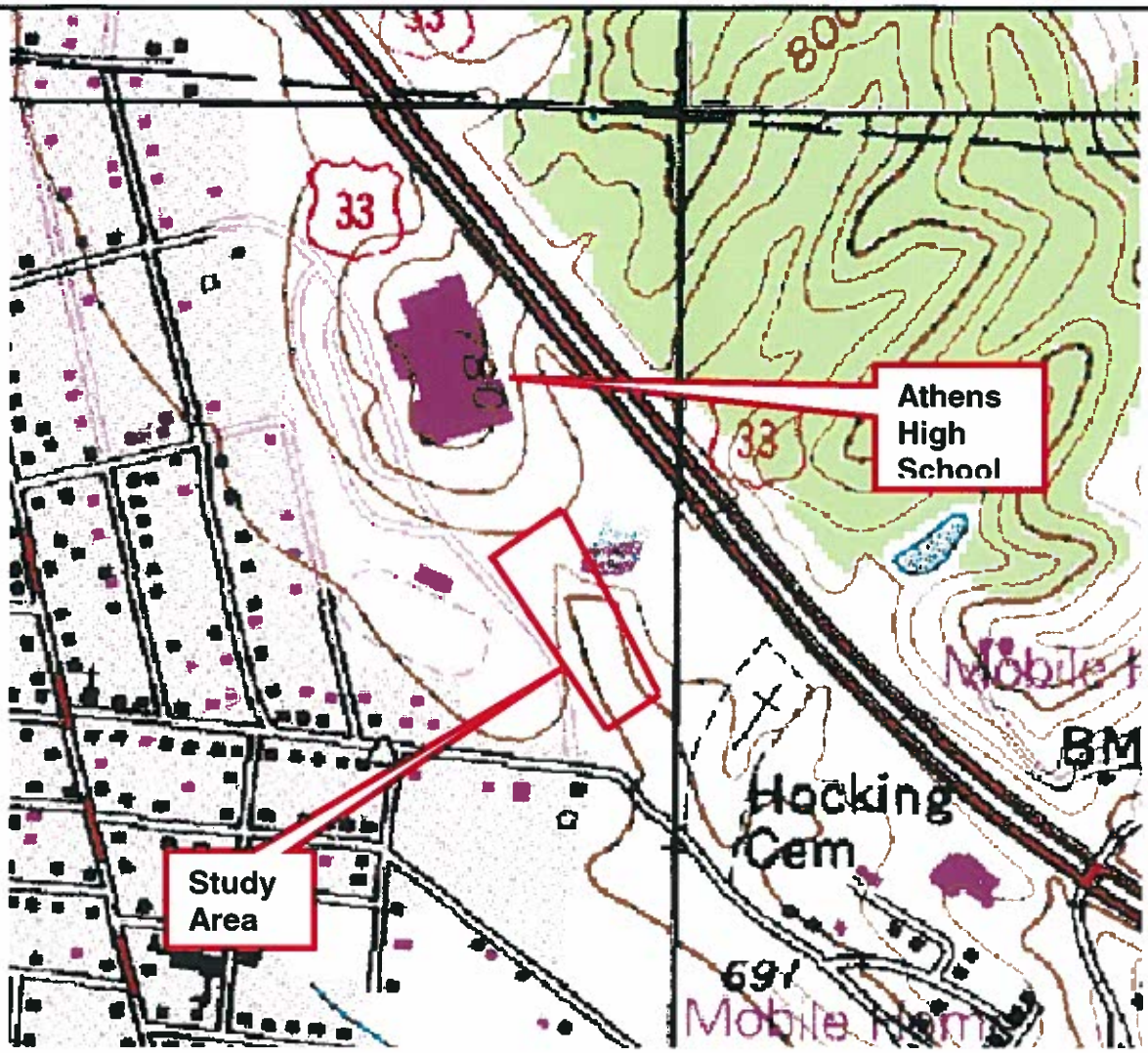
PREPARED FOR: Athens City Schools

DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP



psi Information To Build On
Engineering • Consulting • Testing

Topographic Map
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

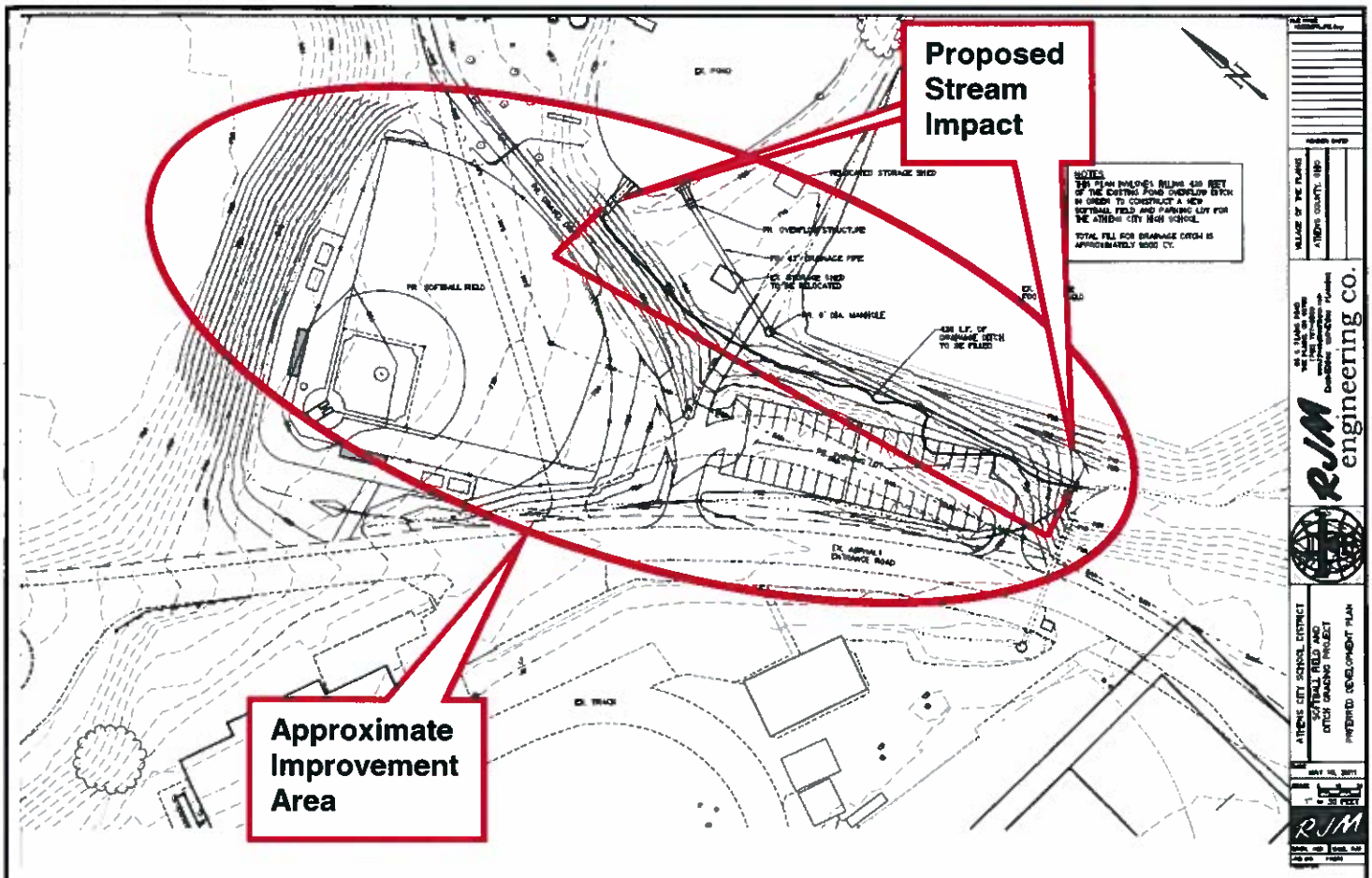
PREPARED FOR: Athens City Schools

DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP



psi Information To Build On
Engineering • Consulting • Testing

Improvement/Study Area with Photo Locations
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

PREPARED FOR: Athens City Schools

DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP

Ohio Department of Natural Resources

JOHN R. KASICH, GOVERNOR DAVID MUSTINE, DIRECTOR

Ohio Division of Wildlife
David B. Lane, Chief
2045 Morse Rd., Bldg. G
Columbus, OH 43229-6693
Phone: (614) 265-6300

June 23, 2011

Bruce Pollard
PSI
4960 Vulcan Ave.
Columbus, OH 43228

Dear Mr. Pollard:

I have reviewed our Biodiversity Database for the Athens High School Athletic Field Improvements project area, including a one mile radius, at 1 High School Rd. in Athens Township, Athens County, and on the The Plains Quad (0655440). We have no records for rare or endangered species or other significant natural features at the project site. However, we have one record within the one mile radius of the project site. The location for the Clubshell (*Pleurobema clava*), a state endangered and federal endangered mussel, is shown in red on the attached map.

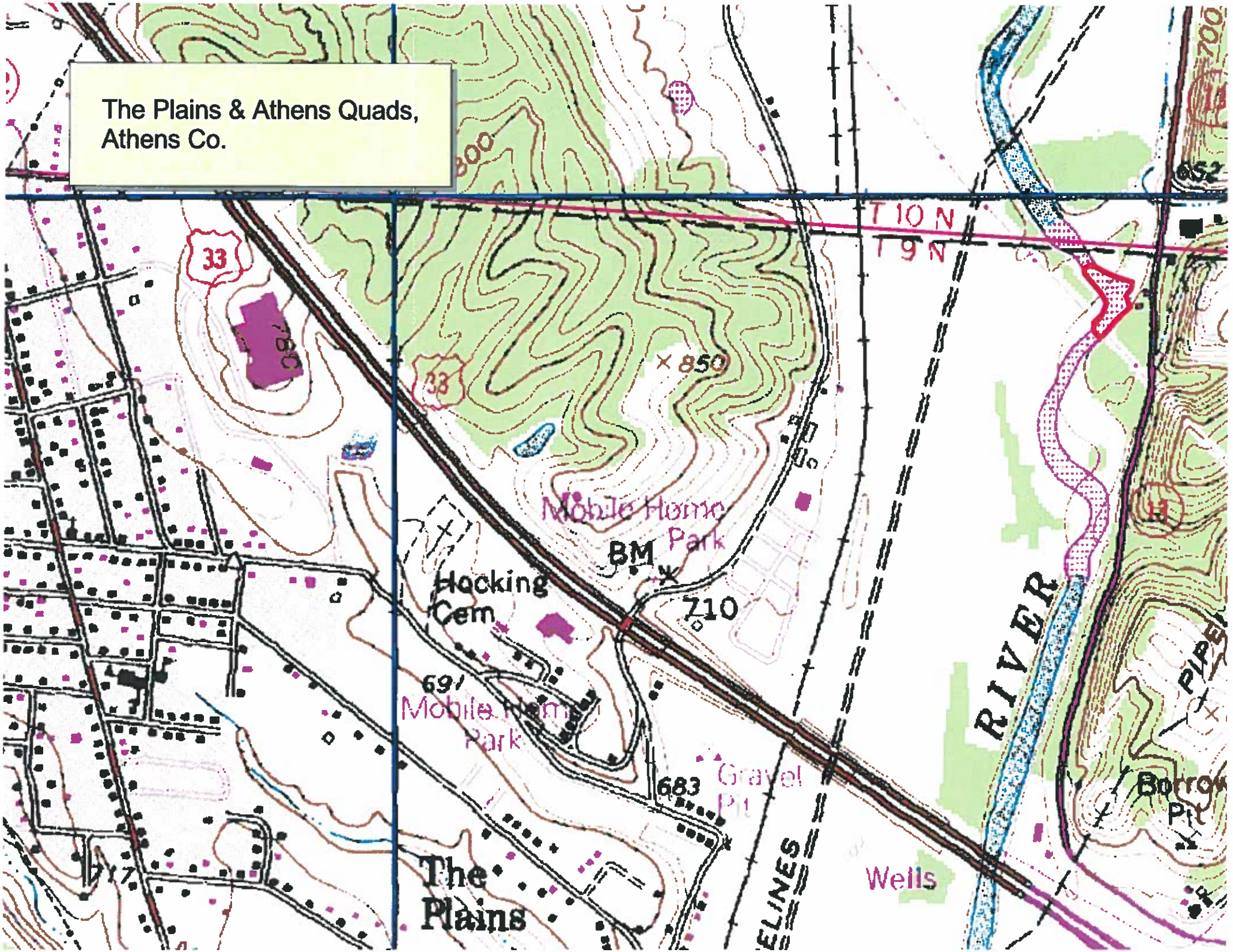
We are unaware of any unique ecological sites, geologic features, animal assemblages, scenic rivers, state wildlife areas, nature preserves, parks or forests, national wildlife refuges, parks or forests, or other protected natural areas within a one mile radius of the project area.

Our inventory program has not completely surveyed Ohio and relies on information supplied by many individuals and organizations. Therefore, a lack of records for any particular area is not a statement that rare species or unique features are absent from that area. Please note that although we inventory all types of plant communities, we only maintain records on the highest quality areas.

Please contact me at 614-265-6818 if I can be of further assistance.

Sincerely,

Debbie Woischke, Ecological Analyst
Ohio Biodiversity Database Program


The Plains & Athens Quads,
Athens Co.
T 10 N
T 9 N
33
760
800
850
Mobile Home Park
BM
Hocking Cem
710
691
683
Gravel Pit
The Plains
Wells
RIVER
652
700

Information To Build On
Engineering • Consulting • Testing

June 13, 2011

Dr. Mary Knapp
US Fish and Wildlife Service
4625 Morse Road, Suite 104
Columbus, Ohio 43230-8355

Reference: Habitat Evaluation for Endangered Species
Proposed Athens High School Improvement Study Area
The Plains, Athens County, Ohio
PSI Project No. 655440

Dear Dr. Knapp:

Introduction

Professional Service Industries, Inc. (PSI) has visited the approximate 3.5-acre referenced property (study area) to evaluate habitat conditions and determine if habitats are suitable for the Indiana bat (E), American burying beetle (E), pink mucket pearly mussel (E), fanshell mussel (E), sheepnose mussel (C), snuffbox mussel (SC) or timber rattlesnake (SC). These species are designated as endangered, candidate species, or species of concern in Athens County. This request for concurrence and/or comments is in conjunction with an Individual Permit (IP) application to impact 426 feet of intermittent stream in conjunction with improvements planned for the Athens High School Athletic Fields in The Plains, Ohio. Please comment on this evaluation with a follow-up letter response.

Property Description

The property consists of mostly open areas used for recreational purposes. A sparsely wooded intermittent stream corridor crosses the eastern portion of the study area from north to south. Approximately four hundred twenty six (426) linear feet of this stream will be impacted to facilitate development of the new athletic improvements to the school campus and will require mitigation in accordance with a 401/404 Individual Permit from OEPA and USACE. The USACE is in the process of verifying a jurisdictional waters delineation and the only jurisdictional water on the property is the intermittent stream.

Species Habitat Potential

The Indiana bat prefers large, partially exposed trees with sloughing or exfoliating bark or hollow places for roosting and/or maternity activities. The sparse treed corridor was destroyed in September of 2010 by a tornado that hit the area. What was left of the mangled trees was removed last fall because of the broken and splintered condition of the trees as a result of the storm damage. No trees remain within the proposed athletic field improvement area currently.

The American burying beetle is adaptable to many habitats but needs carrion to survive and reproduce. The beetle is being reintroduced to remote portions of western Athens County several miles to the west. The beetle prefers natural fallow grass fields or open woodland areas. Because the subject property is well maintained mostly mowed grass for athletic/recreational fields, it is not likely that the beetle inhabits the area of concern.

The intermittent stream segment on-site and the remainder on the school property immediately downstream are not large enough for mussel habitat. This stream typically has little if any flow during the drier portions of the year and substrates are clay/silt soils in most areas. Flow exists only when the upstream pond overflows. The mussels listed for Athens County prefer loose sand and gravel substrates in medium to small rivers and continuous water flow. Suitable habitat for mussels was not observed within the property boundaries.

Timber rattlesnakes prefer wooded terrain or fallow fields. The area of concern for the athletic field improvements is a maintained mowed field with a small stream, void of trees and not conducive to timber rattlesnake habitat.

Conclusions

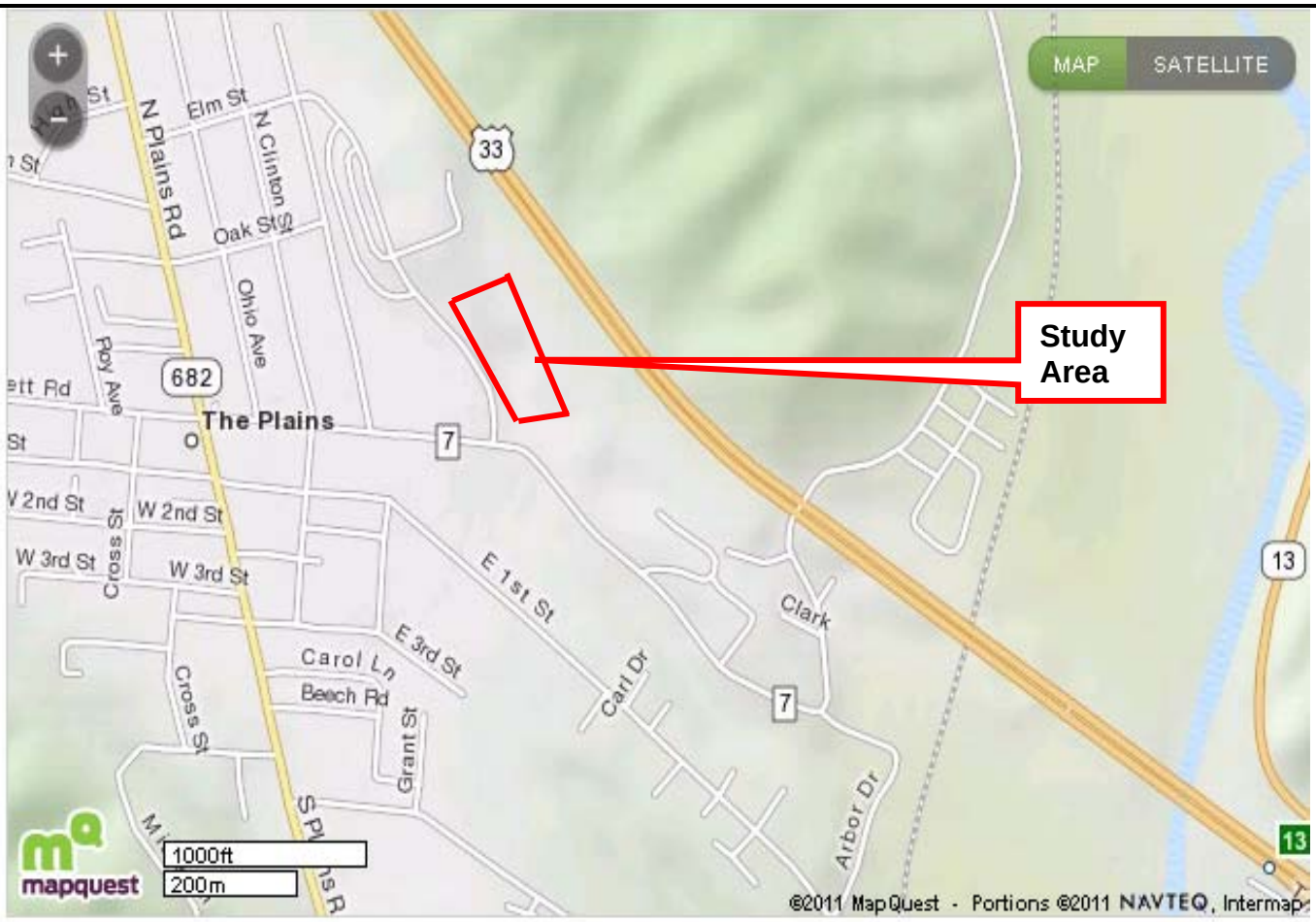
Based on the removal of all trees in the study area as potential bat roosting trees because of the tornadic storm last fall; the property stream habitat conditions compared to those preferred by the endangered, candidate and special concern mussel species; the proximity and use of the property relative to the known areas of American burying beetle habitation in Ohio; and, the preferred habitats of the timber rattlesnake verses the maintained fields of the study area, it is PSI's opinion that the habitats at the subject property are not suitable for the listed species for Athens County as mentioned and they are not likely present. Please comment on this evaluation with a follow-up letter response. Thank you.

Respectfully submitted,
Professional Service Industries, Inc.

Bruce T. Pollard, CPG
Wetland and Ecological Specialist

Andrew S. Peiken, C.E.
Principle Consultant

Attachments: Study Area Location Map
Aerial Photograph of Property and Study Area
Topographic Map
Proposed Improvement Study Area Plan
Photographs (10)
Headwater Habitat Evaluation Index Form (2 pages)



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psi Information To Build On
Engineering • Consulting • Testing

Study Area Location Map
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

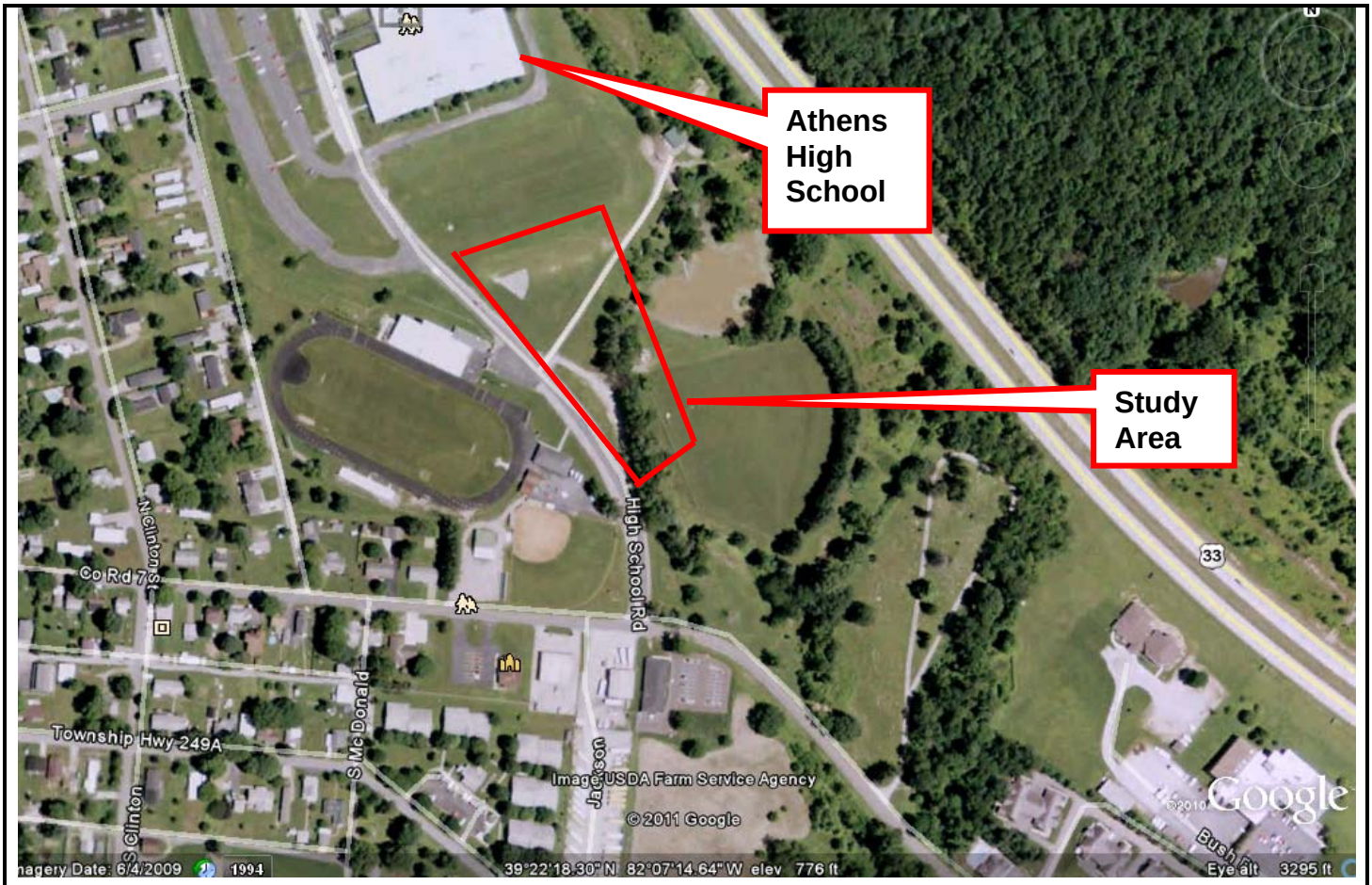
PREPARED FOR: Athens City Schools

DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP



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2009 Aerial Photograph of Property/Study Area
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

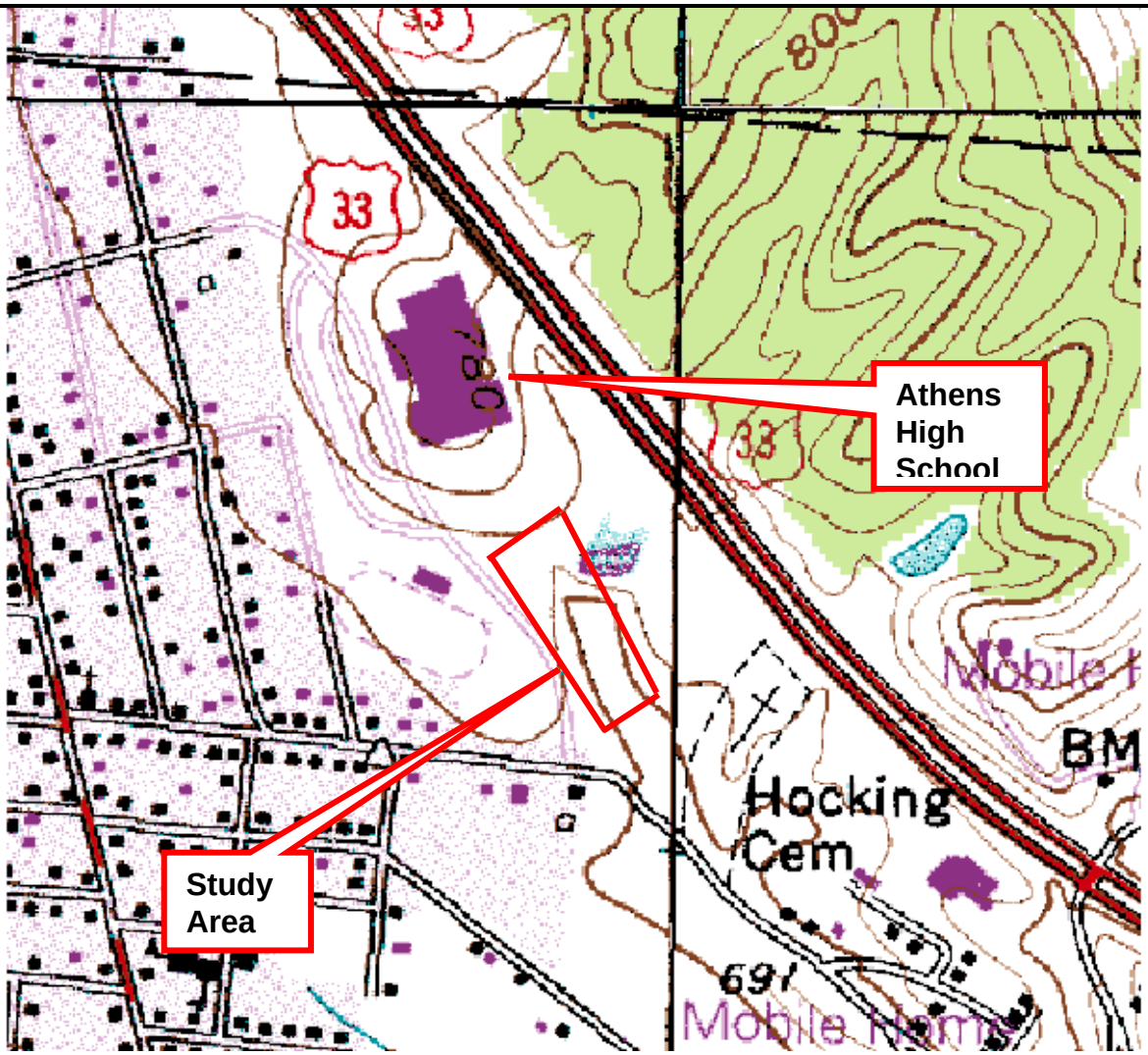
PREPARED FOR: Athens City Schools

PROJECT MANAGER: Bruce T. Pollard

DRAWN BY: BTP

DATE: 6/9/2011

PROJECT NO: 0655440



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Topographic Map
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

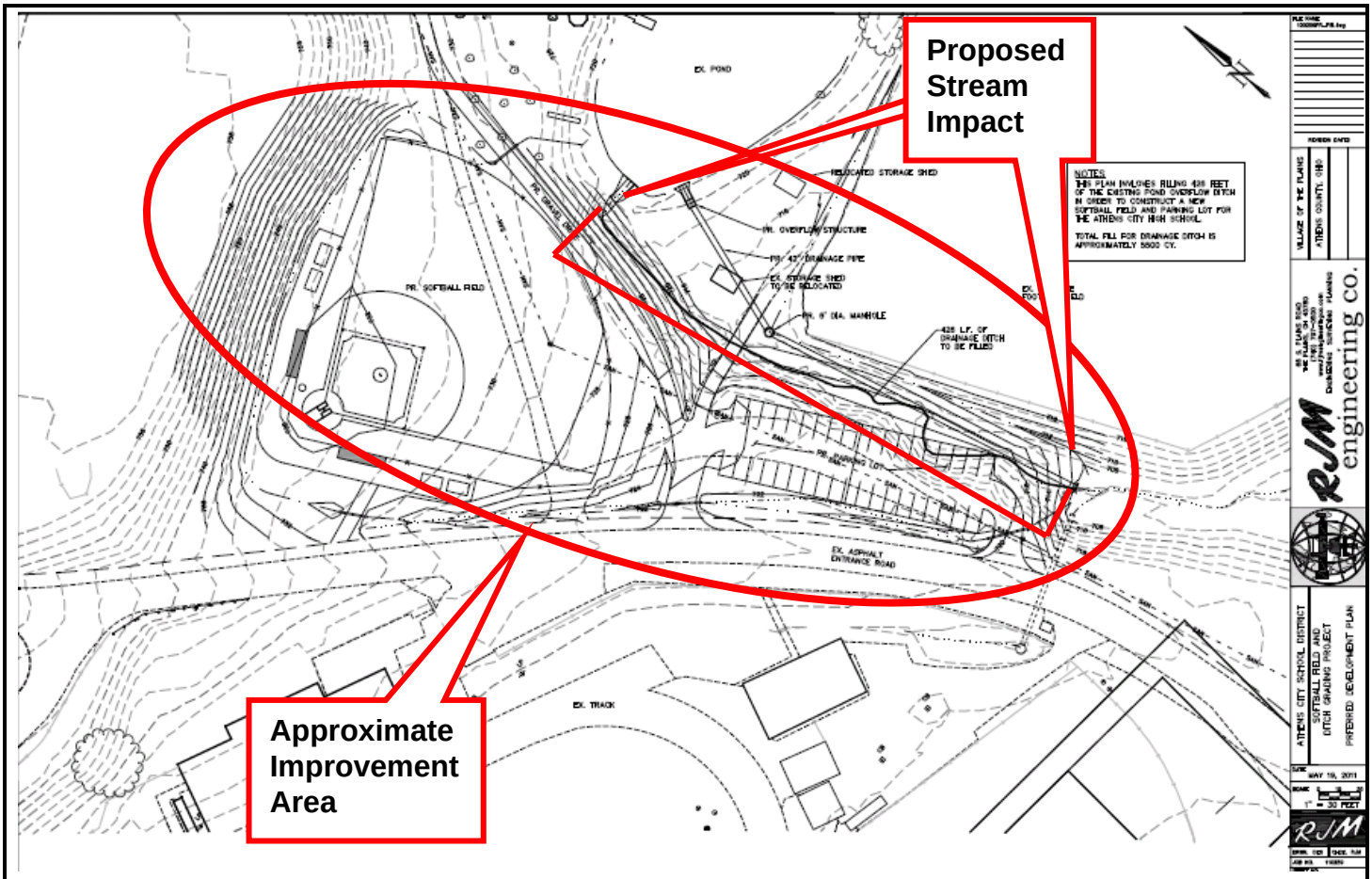
PREPARED FOR: Athens City Schools

DATE: 6/9/2011

PROJECT MANAGER: Bruce T. Pollard

PROJECT NO: 0655440

DRAWN BY: BTP



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Improvement/Study Area with Photo Locations
Proposed Athens High School Athletic Field Improvements
The Plains, Athens County, Ohio

psi Information To Build On
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PREPARED FOR: Athens City Schools

PROJECT MANAGER: Bruce T. Pollard

DRAWN BY: BTP

DATE: 6/9/2011

PROJECT NO: 0655440

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
4625 Morse Road, Suite 104
Columbus, Ohio 43230
614-416-8993 / FAX 614-416-8994
June 21, 2011

Tails: 31420-2011-TA-0781

Bruce Pollard
Professional Service Industries
4960 Vulcan Avenue
Columbus, OH 43228

Re: Endangered Species Review for Athens High School Improvements
The Plains, Athens County, Ohio.

Dear Mr. Pollard:

We have received your recent correspondence requesting information about the subject proposal. There are no Federal wilderness areas, wildlife refuges or designated critical habitat within the vicinity of the project area. We recommend that proposed activities minimize water quality impacts, including fills in streams and wetlands. Best management practices should be utilized to minimize erosion and sedimentation.

ENDANGERED SPECIES COMMENTS: Due to the project type, size, and location, we do not anticipate any impact on federally listed endangered, threatened, or candidate species, or their habitats. Should the project design change, or during the term of this action, 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, consultation with the Service should be initiated to assess any potential impacts.

If you have additional questions or require further assistance with your project proposal, please contact me at the following number (614) 416-8993 x12. I would be happy to discuss the project in further detail with you and provide additional assistance if necessary. In addition, you can find more information on natural resources in Ohio by visiting our homepage at: http://www.fws.gov/midwest/ohio.

Sincerely,

Mary Knapp

Mary Knapp, Ph.D.
Field Supervisor