



Ohio Great Lakes Restoration Initiative (GLRI) Proposal

Project Title: Cuyahoga AOC Strategic Implementation Initiative

Submitted by: Ohio Environmental Protection Agency, Division of Surface Water
Contact Person: Amy Klei, Lake Erie Program
614-644-2871 (phone)
614-644-2745 (fax)
amy.klei@epa.ohio.gov

Address: Ohio Environmental Protection Agency
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

DUNS Number: 809172372
Type of Organization: State Agency

GLRI Federal Funding Requested: \$250,000

TOTAL PROJECT COSTS \$250,000

Project Duration Period: September 1, 2014 through August 30, 2016

Project Description: The Cuyahoga AOC Strategic Implementation Planning Initiative will identify and organize projects needed to delist the tributary portions of the Cuyahoga River Area of Concern (AOC). These projects, when combined with identified actions in the shipping channel, will represent the list of management actions needed to remove Beneficial Use Impairments (BUIs) and delist the AOC. Projects related to removal of contaminated sediments and the restoration of impaired habitat will be prioritized. All identified projects will be directly linked to the updated state BUI Restoration and Removal Targets and will contain preliminary cost estimates, potential implementing parties and projected resulting environmental improvements. The Cuyahoga Remedial Action Plan (RAP) organization will play a key role by providing assistance to watershed groups, providing GIS support, (and in partnership with Ohio EPA) evaluating projects and producing a final AOC Strategic Implementation report for Ohio EPA's review, approval and use. Ohio EPA will issue a Request for Proposals (RFP) soliciting project proposals from local watershed groups within the AOC and awarding subgrants as a result of the competitive process.

Project Location(s): The project will be implemented in the Cuyahoga River AOC which encompasses the Cuyahoga River watershed from the City of Akron to the river mouth in the City of Cleveland and from Edgewater Beach on the west side of Cleveland to Wildwood Park, roughly 9 miles to the east. This area encompasses much of the urban and industrial heartland of northeast Ohio and includes the Cuyahoga Valley National Park midway between Akron and Cleveland. The Cuyahoga River Area of Concern is one of 43 designated areas of persistent industrial and urban pollution in the Great Lakes.

HUC Code: 04110002
 Latitude: 41.4868oN
 Longitude: -81.6909oW
 State: Ohio
 Congressional District: 10, 11, and 13
 County: Cuyahoga, Summit and Medina
 City: Cleveland and various surrounding municipalities
 Zip Code: Multiple zip codes within the three counties

Cuyahoga River Area of Concern

HUC 12	HU 10 NAME	HU 12 NAME
04110002 03 02	Little Cuyahoga River-Cuyahoga River	Mogadore Reservoir-Little Cuyahoga River
04110002 03 03	Little Cuyahoga River-Cuyahoga River	Wingfoot Lake outlet-Little Cuyahoga River
04110002 03 04	Little Cuyahoga River-Cuyahoga River	City of Akron-Little Cuyahoga River
04110002 03 05	Little Cuyahoga River-Cuyahoga River	Fish Creek-Cuyahoga River
04110002 04 01	Yellow Creek-Cuyahoga River	Mud Brook
04110002 04 02	Yellow Creek-Cuyahoga River	Yellow Creek
04110002 04 03	Yellow Creek-Cuyahoga River	Furnace Run
04110002 04 04	Yellow Creek-Cuyahoga River	Brandywine Creek
04110002 04 05	Yellow Creek-Cuyahoga River	Boston Run-Cuyahoga River
04110002 05 01	Tinkers Creek-Cuyahoga River	Pond Brook
04110002 05 02	Tinkers Creek-Cuyahoga River	Headwaters Tinkers Creek
04110002 05 03	Tinkers Creek-Cuyahoga River	Headwaters Chippewa Creek
04110002 05 04	Tinkers Creek-Cuyahoga River	Town of Twinsburg-Tinkers Creek
04110002 05 05	Tinkers Creek-Cuyahoga River	Willow Lake-Cuyahoga River
04110002 06 01	Big Creek-Cuyahoga River	Mill Creek
04110002 06 02	Big Creek-Cuyahoga River	Village of Independence-Cuyahoga River
04110002 06 03	Big Creek-Cuyahoga River	Big Creek
04110002 06 04	Big Creek-Cuyahoga River	Cuyahoga Heights-Cuyahoga River
04110002 06 05	Big Creek-Cuyahoga River	City of Cleveland-Cuyahoga River

Timeline: Upon US EPA notification of the award of this grant, Ohio EPA will release an RFP open only to active watershed groups and local governments in the Cuyahoga River AOC. We anticipate awarding between six and eight subgrants following receipt and a competitive review of subgrant applications. Subgrant agreements will be prepared and fully executed with all successful subgrant applicants. Subgrants will be awarded to the highest scoring applicants until funds have been exhausted

Activities will be conducted within the scope of the following timeline and schedule:

Sept 2014: RFP Prepared and distributed to AOC watershed groups and local governments

Oct 2014: Proposals due 10/31/14

Nov 2014: Reviews completed and subgrants selected

Dec 2014: All subgrant agreements fully executed
Jan 2015: All subgrants operational
Spring 15: Ohio EPA site visits with all subgrantees
Jun 2015: Semi-annual Reports Due to Ohio EPA
Oct 2015: Projects selected for engineering plans
Jun 2016: Final Engineering plans to Ohio EPA

Problem Statement, Project Summary and Approach: Within the Cuyahoga AOC, there are approximately 10 local watershed groups, each engaged in a variety of activities within sub-watersheds throughout the AOC. The priorities of these local groups do not always align with BUI removal and some groups work more effectively within the RAP process than others. The Cuyahoga AOC Strategic Implementation Planning Initiative is designed to encourage coordinated planning to better identify and organize management actions that will result in the removal of contaminated sediments and the restoration of impaired habitat within the AOC. Removing sediments and restoring habitat in this highly urbanized Area of Concern are critical for the removal of multiple BUIs. Upon successful completion of this project, project and management action implementation will be more strategically targeted to specific BUI's and other impairments. This project will improve pace and progress toward BUI removal within the Cuyahoga River Area of Concern.

This project will be implemented by Ohio EPA using existing program staff within the Division of Surface Water's Lake Erie and Nonpoint Source Management Programs and by partnering with active watershed groups and local governments within the AOC. US EPA-GLNPO federal grant funds provided for this project will be sub-granted by Ohio EPA to selected active watershed groups within the Cuyahoga River AOC. All subgrants will be awarded and administered by Ohio EPA using systems and processes consistent with those in place under Ohio's Section 319 and the Surface Water Improvement Fund (SWIF) programs. All subgrantees are required to execute a Great Lakes Restoration Initiative (GLRI)/SWIF subgrant agreement with Ohio EPA that will include all requisite federal assurances and state of Ohio grant requirements. Subgrant funds will be administered consistent with federal cost principles and all applicable uniform administrative requirements. Subgrant agreements will remain in effect for a period of two years from their date of execution.

Ohio EPA will issue an RFP soliciting project proposals from local watershed groups within the AOC. Local subgrants will be issued following a competitive process with the objectives to identify and inventory specific recommendations contained in approved Total Maximum Daily Load Studies (TMDL's) approved 9-element watershed action plans (WAPs), the Cuyahoga River AOC Stage 2 Report, and other viable planning efforts completed within the AOC. Projects will focus on identifying and removing contaminated sediments and/or restoring impaired habitat. Projects developed and/or identified as a result of this project will be directly linked to the updated state BUI Restoration and Removal Targets and will contain cost estimates, likely implementer(s), and resulting environmental improvements.

Results-Outputs and Outcomes: Project Priorities and Alignment - This project will accelerate implementation of recommended restoration and remedial projects designed to remove BUI's within the Cuyahoga River Area of Concern. The framework for this project is the state of Ohio's Updated Delisting Guidance and Restoration Targets for Ohio's Areas of Concern (Delisting Guidance), local 9-element watershed action plans, and the Cuyahoga AOC Stage 2 Report. Components of the project will also be completed consistent with Ohio's NPS recommendations within the state of Ohio's

Nonpoint Source Management Plan (2006) and the conditionally approved Ohio Coastal Nonpoint Source Management Plan. Insuring these connections with these plans will help to allow funding eligibility and integration with other water quality programs that are operational within the Area of Concern.

Deliverables: Each subgrant will produce deliverables that are unique to their subwatershed; however, Ohio EPA uses a standardized “universe of deliverables” that insures consistent project focus, grantee reporting and progress tracking. For the purposes of this initiative, all watershed-specific Strategic Implementation Plans (SIPs) will be prepared at the HUC-12 scale using a format that will be developed and required by Ohio EPA. Following is a brief summation of the deliverables that will be deployed during the development of the SIPs:

Local Watershed Group Strategic Implementation Planning Deliverables

- Identifying, plotting and mapping using GIS critical areas of impairment in the AOC
- Reviewing TMDLs, watershed plans and Reports to inventory causes of impairments in AOC
- Identifying specific management actions needed to substantially progress to BUI removal
- Identifying additional actions that are needed to substantially progress toward BUI removal
- Estimating the expected environmental improvements resulting from recommended actions
- Networking with local implementers who can be linked to completing needed projects
- Identifying and listing potential funding sources for each recommended management action
- Developing schedules for local implementation of identified needed management actions
- Draft a watershed specific Strategic Implementation Plan using a format provided by Ohio EPA
- Subcontracting for the completion of at least one engineered project design per subgrantee. Projects selected for moving forward with engineered design must be submitted to and approved by Ohio EPA prior to executing the subcontract.

Designated RAP Facilitating Organization Strategic Implementation Plan Deliverables

The designated RAP facilitating organization, CRCPO, will provide important services to this project including serving as liaison between Ohio EPA and local active AOC-based watershed groups. CRCPO will also be a central clearinghouse for technical and planning assistance, as well as serving as the chief editor and collator of information provided by the local watershed groups. CRCPO's compilation of strategic action items submitted by the watershed groups will be packaged and provided to Ohio EPA as a Cuyahoga AOC Master Habitat Restoration Plan for increasing pace and progress towards BUI removal. The following deliverables will be completed by CRCPO under this project:

- Reviewing, editing and evaluating recommended local management actions
- Developing GIS coverage of HUC-12 recommended projects and associated BUIs within the AOC
- Developing GIS coverage of contaminated sediment sites and potential disposal areas
- Working closely with Ohio EPA to develop a prioritized listing of recommended actions
- Implementing needed actions in the shipping channel to improve pace to BUI removal
- Producing a comprehensive final report and Master Plan that will be submitted to Ohio EPA

Application review criteria will be derived from existing Section 319 and Surface Water Improvement grant processes currently used by Ohio EPA. Applications are reviewed using a set of administrative

and technical criteria for which scores are assigned. Subgrant applicants will be then be ranked by score with funding provided to the highest scoring applicants until funds are exhausted.

Subgrants made under this project will be administered and executed using the procedures and processes that Ohio EPA employs to make subgrants under the Section 319(h) program. We are also familiar with GLNPO requirements such as the GLAS system through our experience with the 2010 GLRI grant that we were fortunate to receive.

Collaborations, Partnerships and Overarching Plans: Ohio EPA will work closely with local watershed groups, local governments and the designated Remedial Action Group (CRCPO) to insure timely and successful completion of all deliverables associated with this initiative. Additionally, other local, state and federal agencies may participate in this project as is appropriate. Ohio EPA will serve as the designated contact person for coordinating activities with federal partners such as USFWS, EPA-Region 5, GLNPO and others.

The following watershed groups will be encouraged to submit a proposal in response to Ohio EPA's RFP that will be issued in response to this project:

- Friends of Big Creek
- Brandywine Creek Watershed Group
- Friends of Chippewa Creek
- Summit County Metroparks – Furnace Run and Sand Run
- Little Cuyahoga River – City of Akron
- Mill Creek and West Creek Watershed Organization
- Tinkers Creek Watershed Group
- Doan Brook Watershed Group
- Euclid Creek – Cuyahoga County SWCD
- Friends of Yellow Creek
- Friends of the Crooked River
- Dugaway Creek Watershed Organization
- Cuyahoga River Community Planning Organization – Cuyahoga RAP

Project Effectiveness Monitoring and Federal Grants Compliance: Project effectiveness monitoring will be conducted through semi-annual project site visits and delivery of technical assistance (as needed) by members of Ohio EPA's Lake Erie Program. In addition, all sub-grantees are subject to financial and compliance audits. Ohio EPA contracts with ODNR's External Audit Section to perform ten subgrant audits per year. Project effectiveness and grants compliance/audit activities will be provided by Ohio EPA using existing staff and capabilities at no direct costs to this project.

All sub-grantees will be required by executed grant agreements to comply with all state and federal grant requirements. Non-compliance will result in refunding any inappropriately managed federal grant funds and/or termination of the subgrant agreement when necessary.

Community-Based Focus and Environmental Justice: This project recognizes and improves adverse economic and environmental conditions within the Cuyahoga River AOC. The majority of the Cuyahoga County areas lie within Cuyahoga County, Ohio. Cuyahoga County is among the most densely populated counties in Ohio with a population of 1,264,000. There are more than 535,000 households within the county. The racial makeup of the county is 60% Caucasian, 30% African-

American, 5% Hispanic and 5% Asian and others. Over 17% of the households in Cuyahoga County are below the national poverty line.

Programmatic Capability and Past Performance: Ohio EPA routinely receives four to eight federally funded assistance agreements each year from US EPA. These agreements help support Ohio's water pollution control, nonpoint source, and water quality monitoring and assessment programs. This proposal is similar in size and scope to several of the assistance grants that Ohio has administered recently. We have a history of successfully completing projects on time, on budget and meeting all reporting requirements. US EPA's annual evaluations of Ohio EPA's water programs are consistently very positive.

This particular project will be managed by Ohio EPA's Lake Erie and Nonpoint Source Programs within the Ohio EPA-Division of Surface Water. In the past 15 years, we have successfully administered subgrants for more than 175 locally implemented watershed projects totaling more than \$40 million in federal Section 319 funding and more than \$9 million in state Surface Water Improvement funds. We maintain a vigorous subgrant oversight protocol resulting in an exceptional level of accountability, efficiency and accomplishment. Ohio EPA contracting methods were improved in 2005 with the development and implementation of a standardized universe of "grant" deliverables. This system has resulted in much improved communication of expectations and greatly enhanced project reporting. This process is the framework for all sub grants awarded under this project.

Principal Program Staff and Qualifications: Ohio EPA's nonpoint source and Lake Erie program staff will be managing the Cuyahoga AOC Strategic Implementation Initiative Project. Principal program personnel responsible for implementing this project include:

- **Russell Gibson, NPS Program Manager**—Mr. Gibson has managed Ohio EPA's NPS and Section 319 Programs since 2005. Previously, he worked for more than 20 years with Ohio's Department of Natural Resources in a variety of positions including manager of permitting, hydrology & bonding for Mineral resources; northwest Ohio scenic rivers coordinator; community grants administrator for the Division of Recycling and as a preserve manager and park ranger. Mr. Gibson has a bachelor's degree in Natural Resources Management from Ohio State University as well as extensive graduate coursework in Public Administration. He has extensive experience in program development and evaluation, strategic planning and organizational design and has completed three federal grants training courses offered by Management Concepts, Inc., including "Awarding & Monitoring Sub-awards under Federal Grants" and "Federal Cost Principles".
- **Martha Spurbeck, Grants Administrator**—Ms. Spurbeck is the grants administrator for Ohio's NPS and Section 319 programs since 2000 and will be the primary responsible party for administering SWIF/GLRI subgrants. She has a bachelor's degree in Business Management from Ohio University and has completed three federal grants training courses offered through Management Concepts, including "Awarding & Monitoring Sub-awards under Federal Grants" and "Federal Cost Principles".
- **Amy Klei, Environmental Specialist**—Ms. Klei is the Lake Erie Coordinator for Ohio EPA's Lake Erie Program. Ms. Klei has bachelor's degree in Geology from Denison University and a master's degree in Water Resource Management from Duke University. She has been directly involved with Ohio's Areas of Concern program in 2010 when she became the Lake Erie Coordinator. Ms. Klei will serve as project manager.

Ohio EPA staff also routinely access engineers, technical NPS program specialists, storm water management specialists, permitting and regulatory personnel and agency fiscal and financial management staff. We also work closely with Ohio EPA personnel responsible for managing Ohio's State Revolving Loan Fund and Water Resources Restoration Sponsorship Programs, each of which provides support for stream restoration and nonpoint source pollution management programs statewide.

Funding and Project Budget: We anticipate supporting six to eight subgrant funded projects with the requested GLRI funding. Approval of this request will enable us to increase environmental benefits and accelerate the implementation of targeted management actions within the Cuyahoga AOC. This project will also provide for improved targeting of implementation dollars on identified critical areas and BUI's.

Sub-Granting: This project will be implemented within Ohio's existing Lake Erie and Nonpoint Source Program areas. Sub-grants awarded under this project will be conducted using existing Ohio EPA program staff using existing subgranting systems and processes already in place under Ohio's program. No additional staff is needed to implement this project. A component of this award will be noncompetitively awarded approximately \$15,000 to the Cuyahoga RAP (CRCPO) to assist local watersheds and to collate all deliverables into a final report/package to Ohio EPA. We anticipate that 6 to 8 competitive proposals, averaging \$30,000, will be awarded as subgrants (Ohio EPA's RFP will have a maximum amount of \$40,000 that may be requested with encouragement to be lower than the maximum). The total budget is \$250,000.

For additional budget detail, please see the Budget Object Class Categories descriptions that are included with our SF424 and the grant application package.

Project Expenditures: Expenditures incurred under this grant will be reviewed by Ohio EPA fiscal and grant staff prior to being reimbursed to sub-grantees and/or Ohio EPA. Subgrant costs have been scrutinized to minimize overhead and other administrative costs while still maintaining sufficient amounts to insure successful implementation.

For additional budget detail and information, please refer to the following tables as well as the attached 424A and Object Class Budget Detail.