



March 27, 2026

Limited Environmental Review and Finding of No Significant Impact

Appalachia Ohio Alliance

Salt Creek Narrows – BTG, Lyons & DeLong Additions - Hocking and Vinton Counties

WRRSP number: WR391662-0029

Sponsor: Columbus SWWTP Power Systems Upgrades and Safety Improvements- Franklin County

WPCLF Loan Number: CS390274-0537

The attached Limited Environmental Review (LER) is for a nonpoint source project in Hocking and Vinton counties which the Ohio Environmental Protection Agency (Ohio EPA) intends to finance through its Water Resource Restoration Sponsor Program (WRRSP). The LER describes the project, costs, and expected environmental benefits. Making available this LER fulfills the Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. In accordance with Ohio Administrative Code 3745-150-05, this project meets the criteria for an LER rather than the more comprehensive Environmental Assessment. More information can be obtained by contacting the person named at the end of the attached LER.

Upon issuance of this Final Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

A handwritten signature in black ink that reads "Kathleen Courtright".

Kathleen Courtright, Assistant Chief
Division of Environmental and Financial Assistance

LIMITED ENVIRONMENTAL REVIEW

Project Identification

WRRSP Project: Salt Creek Narrows – BTG, Lyons, & DeLong Additions
WRRSP Applicant: Appalachia Ohio Alliance
WRRSP Loan: WR391662-0029

Sponsoring Project: SWWTP Power System Upgrades and Safety Improvements
Sponsoring Community: City of Columbus
Sponsoring WPCLF Loan: CS390274-0537

Project Summary

Appalachia Ohio Alliance (AOA) seeks \$4,000,000 in funding through Ohio EPA’s Water Resource Restoration Sponsor Program (WRRSP) to purchase and protect 550 acres on eight parcels from three separate landowners (BTG, Lyons, and DeLong) and is referred to throughout as the Salt Creek Narrows – BTG, Lyons, & DeLong Additions (Salt Creek BLD). The project site’s aquatic resources include 1,350 linear feet (LF) of Salt Creek, 20,279 LF of Primary Headwater streams, multiple wetlands, and their associated riparian forests. The “Narrows” area of the Salt Creek corridor is in the southern portion of the Hocking Hills drainage, which is part of the headwaters of the Scioto River watershed. This project will add to AOA’s ongoing effort to protect, restore, and connect the riparian areas along the Salt Creek corridor, creating a near-contiguous 1,500-acre Salt Creek riparian corridor nature preserve. The DeLong property is in Salt Creek and Benton townships, Hocking County; the BTG property is in Salt Creek Township, Hocking County and Eagle Township, Vinton County; and the Lyons property is in Eagle Township, Vinton County (see figures 1 and 2).

It is anticipated that the City of Columbus will sponsor the project through a Water Pollution Control Loan Fund (WPCLF) loan administered by Ohio EPA’s Division of Environmental and Financial Assistance (DEFA).

The purpose of the WRRSP is to counteract the loss of ecological function and biological diversity that jeopardizes the health of many of Ohio’s water resources. In the program, entities such as park districts and land conservancies (implementers) undertake ecologically restorative and protective projects. Borrowers from the WPCLF program voluntarily sponsor such projects in return for interest rate discounts. Ohio EPA foregoes a portion of the interest that borrowers would repay to the WPCLF and advances it to implementers to carry out ecologically beneficial projects. Properties are acquired, restored, and managed in perpetuity under a management plan and an environmental covenant that establishes use restrictions on the land.

History & Existing Conditions

As the state’s third largest watershed, the Scioto River basin drains 6,510 square miles of central and southern Ohio into the Ohio River. The Salt Creek watershed is within the Scioto River basin

and drains 555 square miles from portions of Fairfield, Pickaway, Hocking, Ross, Vinton, Pike, and Jackson counties. The project is located within the Salt Creek watershed along the Salt Creek mainstem in the “Narrows” area within the Village of Eagle Mills – Salt Creek subwatershed. The Narrows area, which straddles Hocking and Vinton counties, is a result of a glacially induced reversal of river flow due to ice damming, which left behind extraordinarily rugged landscapes featuring high ridges and narrow, steep sloped stream valleys. Over 90% of this subwatershed’s land use is forest cover while the remaining 10% is for agriculture, single family residences, and vacation cabins.

Although the water quality is generally high within the Salt Creek watershed, there are impairments identified in Ohio EPA’s 2009 Total Maximum Daily Load (TMDL) for Salt Creek. Three of this watershed’s primary impairments applicable to the project are sedimentation, loss of trees within the riparian corridor, and elevated nutrients. And within the Narrows area of the watershed, there are three additional land use trends threatening water quality which include tree cutting, off-road ATV usage, and vacation cabin construction and ensuing development. The spring-fed cool water streams throughout the watershed and the project site’s steep topography and highly erodible soils are particularly susceptible to these impacts.

The BTG property is recovering from historic logging activity, although much of it, especially the valley bottoms and slopes, contains maturing forest; however, logging roads are still present. Portions of the property that were clear cut within the past decade are now inhabited by young successional forests. The greatest concern with the property’s long-term forest recovery will be managing invasive species colonization, particularly, tree of heaven, within the forested areas. Additionally, there is a power line utility corridor on the northern 130 acres that has existed for decades. It has very minor impact on the stream corridor that it crosses because the property is forested on both sides of the transmission line right-of-way and the primary stream that it traverses remains a Class III stream system.

Historic habitat modifications at the DeLong property include prior select-cut forestry practices, utility and pipeline rights-of-way, and gas storage well installation. The electric utility corridors and gas pipeline right-of-way are periodically cleared by the utility company as allowed by their easements; however, they do not pose significant impacts on the site’s water resources. The oil and gas lease is located far from the property’s aquatic resources and requires a small footprint. The gas pipeline that crosses Salt Creek was recently placed, and future work is not anticipated to be necessary for decades. If any future work is needed, it will be mitigated through coordination and best management practices.

The Lyons property was used as a game reserve until it closed in 2023. The reserve’s exotic animals were confined within chain-linked fencing and watering holes were excavated from cool-water springs and ephemeral headwaters. All the exotic animals have been removed from the property. There is a power line utility corridor that is periodically cleared by the utility company; it is located on ridges in a small area at the southern end of the property and does not affect the primary stream corridors.

Streams and Rivers

Streams and rivers are categorized as having a watershed of more than one square mile, are larger than headwater streams, and receive headwater stream flow. Water quality standards establish minimum water quality requirements for streams and rivers in order to enhance, improve, and maintain water quality. The standards consist of designated uses and the chemical, physical, and

biological criteria designed to represent measurable properties of the environment that are consistent with the goals specified by each use. The tiered system of use designations provides for different levels of protection and reflects the choices implicit in reconciling the "ideal" (represented by least impacted reference conditions) with the "reality," the ongoing effects of two centuries of intensive human use of the state's land and water resources.

Designations for the protection of aquatic life, also called aquatic life use designations, are assigned to individual waterbody segments based upon the potential to support that use according to narrative and numerical criteria. Observing actual attainment of the criteria to designate a particular use is not necessary; if this were the case, there would be little incentive to improve degraded aquatic systems. The Coldwater Habitat (CWH) designation is for waters that support native coldwater or cool water species and put-and-take trout stocking. Exceptional Warmwater Habitat (EWH) is used for waters with unique and unusual assemblages of aquatic life (e.g., waters with the potential for significant populations of endangered species, unusually good chemical quality, above-average abundance of sensitive species, above-average populations of top carnivores). The Warmwater Habitat (WWH) designation is applicable to and represents the principal restoration target for most of the state's rivers and streams; it is characterized by supporting and maintaining a balanced, integrated, adaptive community of warmwater aquatic organisms. Modified Warmwater Habitat (MWH) applies to extensively modified habitats that are capable of supporting the semblance of a warmwater biological community but fall short of attaining WWH because of functional and structural deficiencies due primarily to altered macrohabitat. The lowest degree of biological integrity, reflecting poor and very poor communities, is Limited Resource Water (LRW).

Salt Creek, as it runs through the Narrows Area of the Hocking Hills, is designated as a Superior High Quality Waters (SHQW) and is attaining Exceptional Warmwater Habitat status. Salt Creek runs along the DeLong Property for 1,350 LF.

Headwater Streams

The most prevalent form of stream in Ohio, a headwater stream, is a critical part of the state's natural water infrastructure, nurturing the largest portion of a watershed's biodiversity. Headwater streams are the origins of most rivers and have a watershed of less than or equal to 20 square miles. They mediate the intensity and frequency of downstream floods, picking up, blending, and depositing significant portions of a stream's nutrients, organic matter, and sediment, thus contributing to nutrient cycling and enhancing water quality of larger streams, rivers, and lakes. A subset of headwater streams are Primary Headwater Habitat (PHWH) streams, which generally drain less than one square mile, and are more sensitive to pollution and surrounding land use changes than larger streams. Through a rapid habitat evaluation procedure known as the "Headwater Habitat Evaluation Index (HHEI)," the state can evaluate and manage PHWH streams.

PHWH streams support different types of aquatic biological communities that reflect their chemical, physical, and hydrological characteristics including the water source, the underlying geology and substrate composition, stream thermal characteristics, water quality, riparian quality, and land use within its watershed. A stream's flow regime determines whether a stream is perennial (always flowing), intermittent (flow only during certain times of year), or ephemeral (only flow in direct response to precipitation). Ohio recognizes three general types of PHWH streams based upon stream flow and the biological communities present. These include Class I, II, and III, with Class III being the

highest quality. Class III streams are perennial streams that exhibit moderately diverse-to-highly diverse communities of cold water adapted native fauna (e.g., macroinvertebrates, salamanders, or fish) present year-round due to prevailing flow and temperature conditions which are influenced by groundwater. Class II streams are normally intermittent and exhibit moderately diverse communities of warmwater adapted native fauna present either seasonally or year-round. Class I streams are ephemeral streams that have limited or no aquatic life potential, except seasonally when flowing water is present.

There are a total of 20,270 LF of PHW streams on the BTG, DeLong, and Lyons properties, of which an estimated 12,581 LF are Class III streams. The BTG property contains over 14,949 LF of headwater stream corridor, 8,421 LF of which is Class III PWHW spring-fed streams. There are two Class III PWHW streams totaling 2,600 LF on the Lyons property. And on the DeLong property, there are four high-gradient stream corridors in very deep and narrow ravines totaling 2,730 LF. Two of these streams, totaling 1,560 LF, are Class III PHW streams.

Wetlands

About 90% of Ohio's original five million acres of wetlands have been lost. Wetlands are often called "nature's kidneys" because of their ability to filter impurities from water. They remove nutrient contamination, other pollutants, and suspended sediment due to their biological diversity and the slow rate at which water moves through these systems. Functioning as a natural sponge, they store and slowly release water, reducing erosion and mitigating the impacts of floods. Critical to the survival of one-third of the threatened and endangered species in the United States, they cover only 3% of the earth's surface but store more carbon than rainforests. Through a rapid habitat evaluation procedure known as the Ohio Rapid Assessment Method (ORAM), Ohio's wetlands are assigned a Category of 1, 2, or 3, with Category 3 being the highest quality.

The BTG property is home to one small riparian, Category 2, spring-fed wetland. The Lyons property has one small Category 2 wetland. And there are four very small Category 2 wetlands on the DeLong property in the floodplain, at the base of hillside depressions, and along groundwater seeps and spring-fed streams.

Project Description

AOA will purchase and preserve in perpetuity the 90-acre DeLong, 80-acre Lyons, and 380-acre BTG properties for a total of 550 acres of protected land. The DeLong property includes over 1,350 LF of the right descending bank of Salt Creek and its wide riparian buffer of mostly mature trees. There are 12,581 LF of Class III Primary Headwater streams, over 2,313 LF of Class II Primary Headwater streams, and an estimated 5,385 LF of ephemeral tributaries dissecting the 550-acre project site. There are also several small Category 2 wetlands on the project site, scattered along spring-fed groundwater seeps and floodplain, and one between two utility rights-of-way. See figures 3 and 4.

Restoration efforts will involve removing the exotic animal containment fencing from the Lyons property, allowing the site's understory to naturally regenerate, and restoring and enhancing the multiple manmade watering holes by planting native aquatic herbaceous and shrub species. Invasive species will be aggressively managed with a goal of less than 15% coverage throughout the property. Site access gates will be installed at the primary entry points of the BTG and DeLong

properties to prevent illegal encroachment. Most of the dirt roads that traverse the ridgelines on the property will be allowed to revert to forest; however, some of these roads will continue to be used, including the primary access road, for property and invasive species management purposes. Additionally, the current landowner will retain an easement over a portion of the primary road to access their adjacent property immediately west of the site.

Once complete, the project site will be managed as a nature preserve with limited access.

Implementation

AOA's request for \$4,000,000 in funding through Ohio EPA's WRRSP for their Salt Creek Narrows – BTG, Lyons, & DeLong Additions project will be made possible through the City of Columbus' SWWTP Power Systems Upgrades and Safety Improvements project WPCLF loan award. The funds will be provided by advancing a designated portion of the repayment from the City of Columbus project, which is scheduled to be awarded WPCLF funding in April 2026. By voluntarily agreeing to sponsor AOA's Salt Creek BLD project, Columbus is eligible for an up to 0.1% discount to reduce its WPCLF loan rate.

With an approved sponsorship agreement and environmental covenant, AOA can undertake land acquisition with WRRSP funds at any time between the dates of the WPCLF loan award and the end performance certification for the sponsoring WPCLF project. The WRRSP project spending must be completed before the certification of operation of the sponsoring wastewater project.

Stewardship of the acquired property will be in perpetuity. As noted previously, an environmental covenant will be developed for the property acquisition that will be recorded with the deed once purchased. The covenant ensures that all affected property is preserved in perpetuity in an environmentally sound manner.

Property Management and Maintenance

The project site will function as a nature preserve with access limited to activities that are compatible with nature preserve purposes, for the utility easements, and for the current landowner to access their adjacent property. Public access will be limited to low-impact nature viewing, hiking, outdoor education, and scientific research opportunities by permit or via guide-led tours or volunteer opportunities that do not adversely impact the aquatic resources or conservation values of the property.

AOA will manage invasive species and conduct long-term monitoring and assessments of the aquatic resources and wildlife populations. The property will be protected in perpetuity through use restrictions spelled out in an environmental covenant, which will be part of the deed. Above any other competing management objectives, the protection and preservation of water resources, as specified in the environmental covenant, shall rule the management of the WRRSP-protected property.

These restrictions include:

- There shall be no agricultural, industrial, commercial, or residential activity undertaken or allowed.

- The property may not be divided, partitioned, subdivided, or conveyed except in its current configurations.
- There shall be no buildings or other structures erected or placed, including, but not limited to, billboards or advertising of any kind, camping accommodations, or mobile homes.
- There shall be no mining, drilling, exploring for, or removal of minerals, oil, or gas.
- There shall be no ditching, draining, diking, filling, excavating, or removal of topsoil, sand, gravel, rock, or other materials, except as may be necessary for reasonable preservation, management, and restoration purposes.
- There shall be no manipulation or alteration of wetlands, creeks, streams, surface or subsurface springs, or other bodies of water. Reasonable alternations to surface water bodies and their associated riparian zones may be permitted to protect or improve water quality or aquatic habitat, upon the condition that before any such alterations, a plan for such activities shall be proposed in writing by the Owner or any Transferee and shall be approved by Ohio EPA or shall be approved as an amendment to the Project Management Plan.
- There shall be no open dumping.
- There shall be no building of new roads or other rights-of-way. Existing roads may be maintained but should not be widened or improved.
- There shall be no operation of automobiles, trucks, snowmobiles, dune buggies, motorcycles, all-terrain vehicles, or any other motorized recreational vehicles.
- In accordance with state regulations and as approved by Ohio EPA and authorized by the Owner, hunting and trapping may be permitted to maintain ecological balance or to protect human health and safety.
- Except in areas already identified in the Plan as being disturbed, and as may be necessary for reasonable preservation, management, or restoration purposes, to protect human health and safety, or to maintain a diversity of naturally occurring habitat types and control of exotic non-native and exotic species of plants, there shall be no removal, destruction, cutting, trimming or mowing of any trees or other vegetation and no non-native species shall be introduced.

Public Participation

Ohio EPA is unaware of any controversy about or opposition to this project. The Limited Environmental Review (LER) and Finding of No Significant Impact (FNSI) will be posted on the Ohio EPA Division of Environmental and Financial Assistance website. Additionally, the LER and FNSI have been provided to AOA to be made available according to their public notification procedures.

Conclusion

The Ohio EPA conducts environmental reviews of all projects before awarding WPCLF/WRRSP financing.

Because the proposed WRRSP project is a water quality project consisting of non-structural practices, is sufficiently limited in scope, and meets all applicable criteria, a Limited Environmental Review (LER) is warranted. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

Will have no significant environmental effect and will require no specific impact mitigation as the planning activities for the project identified no potential adverse impacts to the quality of the human environment or sensitive resources such as floodplains, wetlands, state or federally designated wild, scenic, or recreational rivers, riparian areas, prime or unique agricultural lands, aquifer recharge zones, or air quality.

To prevent impacts to threatened and endangered species, if any tree removal, in-water work, or site restoration work is to occur, it should take place during the appropriate window and be coordinated with the WRRSP team and the Ohio Department of Natural Resources.

The proposed project will have beneficial environmental impacts by preserving high-quality streams and wetlands.

Will not affect high-value environmental resources since it will protect the quality of Salt Creek by permanently protecting the property's streams, wetlands, and associated riparian buffer.

Is not a controversial action as it will benefit the environment, and no significant public opposition has been expressed.

Does not create a new or relocate an existing discharge to surface or ground waters since the proposed project does not involve a point source discharge.

Will not provide the capacity to serve a population substantially greater than the existing population since the proposed project is not a publicly owned wastewater treatment works designed to serve a designated area. Instead, it is a protection project of high-quality aquatic resources.

Based upon Ohio EPA's review of the planning information and the materials presented in this LER, we have concluded that there will be no significant adverse impacts from the proposed project as it relates to environmental features. This is because these features do not exist in the project area, the features exist but will not be adversely affected, or the impacts will be temporary and mitigated.

This project is part of an ongoing effort by AOA to protect, restore, and connect the riparian areas along the Salt Creek Narrows Corridor. This project will provide substantial future water quality and ecosystem benefits through the acquisition and protection of these large and important parcels along Salt Creek and within the Narrows valley, including the protection of thousands of feet of Class III, cool-water streams, seep wetlands, and riparian corridor that are critical to the long-term protection of Salt Creek's Exceptional Warmwater Habitat designation.

Contact Information

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Figure 1 and 2. Project area maps

