

August 18, 2026



ATTN: US23-71 Connector Feasibility Study

Ohio Department of Transportation, District 6

400 East Williams Road

Delaware, Ohio 43015

RE: Comments on US23-71 Recommended Alignment

The Appalachia Ohio Alliance (AOA) is a conservation land trust organization. We own 404 acres of conservation properties located on or adjacent to the proposed US 23-71 Connector alignment in Morrow County. These properties, known as the Poston Preserve, are located off of County Road 24, County Road 15 and North Galena Road (as shown on the attached map). The Preserve is described on the Appalachia Ohio Alliance website at the following link: [Poston Preserve - Appalachia Ohio Alliance](#)

The acquisition of Poston Preserve was partially purchased by AOA using funds from the Ohio Public Works Commission (OPWC), Clean Ohio Fund, Green Space Conservation Program. The terms of use of this property are controlled by a Declaration of Restrictions. These restrictions require that the property only be used and improved for conservation purposes. These restrictions are perpetual, run with the land and shall be enforceable by the OPWC.

The acquisition of Poston Preserve was also purchased by AOA using funds from Ohio Water Pollution Control Loan Fund, Water Resource Restoration Sponsor Program. The terms of use of this property are controlled by and Environmental Covenant between the AOA and the Ohio Environmental Protection Agency (Ohio EPA) for the purpose of restoring, maintaining and protecting in perpetuity the aquatic ecosystem resources and the conservation values of this property. This covenant requires maintenance of the property as a natural area in perpetuity with no structures, earth moving activities, drainage alterations, roads, utility lines, motor vehicles and other activities and use limitations stated in the covenant.

Unique features of this Preserve include the following:

1. AOA has submitted deed information to the State of Ohio, Division of Natural Areas and Preserves in support of Poston Preserve being dedicated as a State Nature Preserve. This information is currently under review.
2. Mist net bat surveys in 2020-2024 by qualified professionals found two federally endangered bat species on the Preserve—the Northern Long Eared Bat and the Tricolor Bat. The Northern Long-Eared bat was tracked back to a bat maternity colony site located on the Preserve. The locations of these endangered bats were reported to the Ohio DNR and the U.S. Fish and Wildlife Service and have been mapped and recorded.
3. The historic 1818 Potters Tavern is located on the Preserve. This tavern, which had some role as part of the underground railroad, has been restored by the Poston family.
4. There is a historic stagecoach, and wagon road that runs parallel to the West Branch of Alum Creek on the Preserve. This road extends between Alum Creek and County Road 24.
5. A Poston Preserve Earthwork archaeological site discovered in 2026 is located on the Preserve. This site was described in the summer issue of Ohio Archaeologist magazine.
6. 315,000 native trees were planted on the Preserve in 2026 as part of AOA's deciduous forest restoration program.
7. Thousands of volunteer and AOA staff hours have been used to remove invasive plants and shrubs, plant trees and restore the Preserve since it was acquired in 2023 and 2025.
8. An iNaturalist project for the Preserve has 3,277 observations and recorded 1052 species of plants and animals including numerous state-listed birds and mammals.
9. A two-day botanical survey of parts of the Preserve in 2021 and 2022 documented 438 species of vascular plants including several noteworthy plants such as satin brome, glomerate sedge, weak spear grass and hear-leaved skullcap. A one-day botanical survey of part of the Preserve in 2023 documented 383 species of vascular plants including several noteworthy plants including two potentially threatened (P) state listed plants - grove (or bluntleaf) sandwort and narrow-leaved (or forkleaf) toothwort. A new moss to the state of Ohio was also discovered along Alum Creek.
10. Shale cliffs and barrens on the Preserve are located parallel to Alum Creek and West Branch Alum creek and provide rare habitats with a number of high-quality indicator species like forked-chickweed and yellow-pimpernel. These cliffs are 65-100 feet high and nearly vertical to the stream banks.
11. The Preserve protects 2.2 miles of high-quality stream habitat along Alum Creek and West Branch Alum Creek. The Alum Creek mainstem just downstream of the Poston property (River Mile 42.9) was assessed by the Ohio EPA in 2002. As part of this study the mainstem had a QHEI of 89, an IBI of 48, an ICI score of 48 and it is classified by the

state as Superior High Quality Waters. The West Branch of Alum Creek is also designated by the state as Superior High Quality Waters.

12. The U.S. Forest Service has planted 440 white ash and 75 American elm trees on the Preserve which are part of a study that shows disease resistant traits.
13. The U.S. Fish and Wildlife Service conducted a snake survey on the Dinovo property adjacent to the Preserve in 2018. This survey found 73 snakes of 4 different species. The Dinovo property was among those sites with the highest species diversity and was among the highest capture rates.
14. Seven conspicuous wetlands have been identified and mapped in the Preserve.
15. The Preserve has numerous native vernal ponds and six constructed vernal ponds. Several vernal ponds with abundant aquatic wildlife, including fingernail clams, fairy shrimp, wood frogs, spotted and Jefferson's salamanders, have been documented.
16. Six primary headwater tributaries of Alum Creek are located on the Preserve. These spring fed streams have exceptional water quality.
17. The fish population of Alum Creek and West Branch Alum Creek on the Preserve has been evaluated using seines and electrofishing equipment. This fish population is diverse and includes approximately 27 species of fish including four species of darters.
18. The Preserve has areas of mature forest with numerous swamp white oaks, red oaks and American Beech that are four feet in diameter or larger.
19. Ospreys and bald eagles have nests along West Branch Alum Creek and Alum Creek on or adjacent to the Preserve and frequently fish in these two surface waters.

The proposed Connector alignment would encroach on and negatively impact AOA's 70.34-acre parcel M335010000700 in Morrow County and 11.5-acre parcel 51720001037000 in Delaware County. The proposed alignment would also negatively impact the entire Poston Preserve by bisecting AOA properties and by constructing a bridge across Alum Creek. See the attached map of the Connector alignment through the Preserve.

The proposed bridge construction across Alum Creek and clearing of the forest on the Connector alignment on both sides of Alum Creek is expected to result in erosion and sedimentation and the long-term degradation of water quality, fish habitat and aquatic resources in the Upper Alum Creek Watershed and in the Poston Preserve. This is contrary to the purposes of the Ohio EPA Environmental Covenant which requires the restoring, maintaining and protecting in perpetuity the aquatic ecosystem resources and the conservation values of this Preserve and the watershed. This is also contrary to the perpetual restrictions of the OPWC Declaration of Restrictions on the property which require perpetual use as a conservation area.

The Connector construction would also create an immediate loss of habitat that supports more than a thousand species of plants and animals on the Preserve including documented Federally endangered bat species. The overall Connector project is also expected to increase stormwater runoff, noise and light pollution, and cause an ecological fragmentation of the Preserve that cannot be fully mitigated.

We respectfully request that current preferred Connector alignment through Poston Preserve be reconsidered. It took decades of work, millions of dollars and thousands of volunteer hours to purchase and restore this Preserve. There should be an alternate alignment or more comprehensive resolution available that would prevent one of the premier conservation success stories in Central Ohio from degradation.

Sincerely,

A handwritten signature in black ink that reads "Steve Goodwin". The signature is fluid and cursive, with a horizontal line at the end.

Steve Goodwin, President

Board of Directors, Appalachia Ohio Alliance

Attachments: Preserve Map Showing Bypass Alignment

Environmental Covenant

Declaration of Restrictions