



February 23, 2007

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

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

Dear Craig:

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

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

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

Demand-side management by promoting downtown housing

One of our fundamental beliefs is that transportation is really a land-use issue. Good land-use planning can reduce the demand for transportation by locating destinations in close proximity. And reducing the demand for transportation should be a top priority. Transportation is costly – economically and environmentally. The less transportation we consume to have access to what we need, the better.

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

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

### Stormwater

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

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

### The Central Viaduct Bridge as a complete street

We request that when improving the Central Viaduct Bridge, ODOT make it a “complete street” by including facilities that accommodate pedestrians, bicyclists, and other non-motorized traffic. Providing this non-motorized connection will create new transportation choices that are affordable, nonpolluting, and conducive for public health by providing physical activity. This facility will safely accommodate existing pedestrian traffic on the bridge between Tremont and downtown. It will also link downtown destinations directly to the planned Ohio & Erie Canal Towpath Trail, a major regional economic development initiative and non-motorized transportation corridor.

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

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

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

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

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

Sincerely

David Beach  
Executive Director