



Environmental
Protection Agency



Cuyahoga River Area of Concern Boundary Expansion Request

Prepared by Kelvin Rogers, Cuyahoga River RAP Coordinator, Ohio EPA

May 26, 2010

The Ohio Environmental Protection Agency and the Cuyahoga River Remedial Action Plan (RAP) Coordinating Committee respectfully request an expansion of the upper boundary of the Cuyahoga River Area of Concern (AOC) from the Gorge Dam in Cuyahoga Falls, Ohio at River Mile 45.1 to River Mile 46.5. The purpose of this request is to incorporate the Gorge Dam pool, allowing future sediment removal and remediation actions to be eligible for funding under the Great Lakes Legacy Act.

In 1988 the Cuyahoga RAP Coordinating Committee voted to expand the original AOC boundary upstream of the ship channel to the Gorge Dam in Cuyahoga Falls, Ohio at River Mile (RM) 45.1. The purpose of setting this boundary was to include and evaluate sources of impairments in the lower watershed including tributaries and the City of Akron combined sewer area. This AOC boundary is presently on file with the U.S. Environmental Protection Agency (USEPA), as reflected on the Great Lakes National Program Office (GLNPO) website (Exhibit A). At that time there was no indication that there would be an opportunity for the removal of this dam, as it was in use to provide cooling water for an Ohio Edison Company coal-fired power generation plant. Since that time, this facility closed in 1991 and demolition of the plant was completed in 2009.

Over the past several years much progress has been made in restoring the Cuyahoga to a free flowing river. Two dams upstream of the Gorge Dam in the cities of Kent and Munroe Falls have already been bypassed or removed. Fish and macroinvertebrate communities have responded positively to the removal of these structures and are now at or near attainment with Ohio water quality biocriteria for aquatic life. The City of Cuyahoga Falls has recently completed a study of the removal potential of two small dams immediately upstream of the Gorge Dam. The Ohio EPA is currently working with city officials to obtain funding for the removal of these dams.

Additionally, Ohio EPA is working with the National Park Service to develop an Environmental Impact Statement for the potential removal of the Brecksville Dam at RM 20 within the AOC.

Completion of these projects will leave the Gorge Dam as the last impediment to unrestricted fish passage in the lower 59 miles of the Cuyahoga River mainstem. Restoration of the habitat and hydrology of the Cuyahoga are critical to the continued restoration of the AOC and is expected to result in delisting of most of the beneficial use impairments in the entire mainstem portion of the AOC.

A 2009 preliminary assessment by USEPA-GLNPO revealed that the legacy sediments behind the Gorge Dam are contaminated to a degree that they cannot be allowed to be released downstream. Removal and remediation of these sediments can best be accomplished with funding from the Great Lakes Legacy Act. However, the boundary must first be extended to include the dam pool in order to access this funding source. Exhibit B depicts the map figure of the requested boundary expansion. One combined sewer overflow point exists within this expansion area which will be effectively addressed by the City of Akron's Long Term Control Plan.

The Cuyahoga River RAP Coordinating Committee consists of 34 river stakeholder members representing state and federal agencies, local public jurisdictions, regional planning organizations, industrial/commercial interests, watershed stewardship groups, and community interest groups. Their participation helps to insure that the RAP is comprehensive and provides important public involvement and education to the watershed community in general.

At the Cuyahoga River RAP Coordinating Committee meeting on May 25, 2010 the RAP membership unanimously passed a motion to extend the upper AOC Boundary to River Mile 46.5 which encompasses the Gorge Dam pool and sediments. A copy of the sign in page from the meeting is included as Exhibit C to show stakeholder members and their organizations in support of this request. In addition, the City of Cuyahoga Falls, Ohio, in which the Gorge Dam is located, has voiced its support of the boundary expansion (see attached letter of support). They note that the future removal of the Gorge Dam will uncover their namesake, the original Cuyahoga Falls, which has been under the dam pool for almost 100 years.

One of the objectives under the Great Lakes Restoration Initiative (GLRI) habitat and wildlife protection and restoration focus area is that by 2014, 4500 miles of Great Lakes rivers and tributaries will be opened and 450 barriers to fish passage will be removed or bypassed. The completed and planned dam removals noted above, along with the removal of the Gorge Dam, will return over 60 miles of the Cuyahoga River mainstem to free-flowing condition. Expansion of the AOC boundary, leading to the removal and remediation of the contaminated sediments from the Gorge Dam pool, is a critical step towards achievement of these objectives.

The Ohio EPA and Cuyahoga River RAP Coordinating Committee respectfully request that the USEPA grant this AOC boundary expansion request.