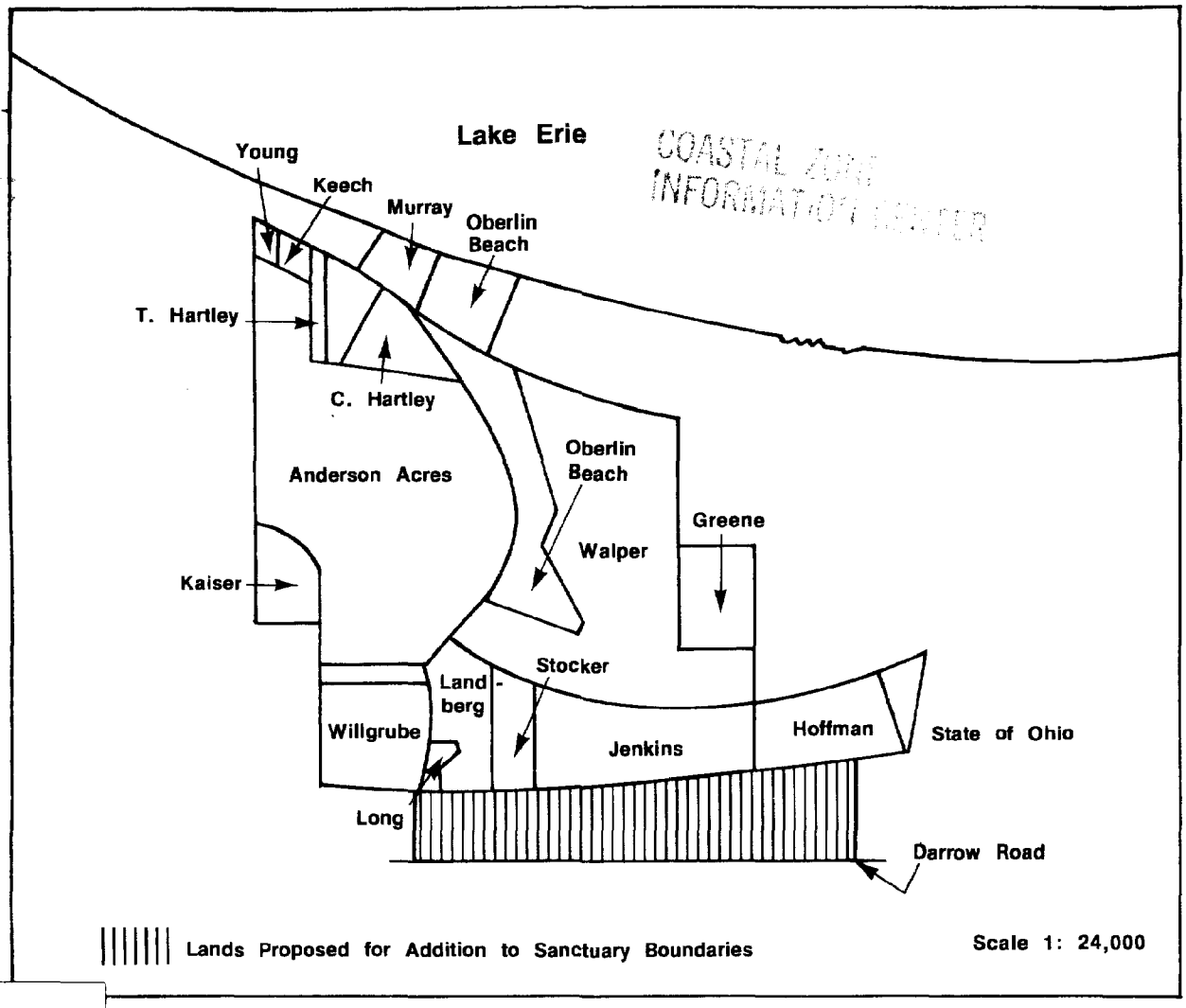
Old Woman Creek Estuarine Sanctuary

Final Environmental Impact Statement

U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Office of Coastal Zone Management



COASTAL ZONE INFORMATION CENTER

a of Proposed Old Woman Creek Estuarine Sanctuary Erie Co., Ohio

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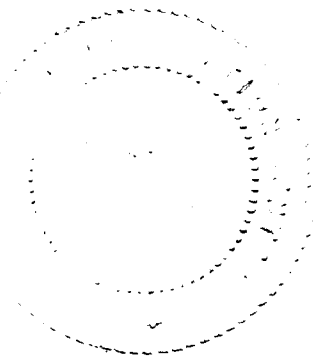
UNITED STATES
DEPARTMENT OF COMMERCE

FINAL
ENVIRONMENTAL IMPACT
STATEMENT

COASTAL ZONE
INFORMATION CENTER

PROPOSED
ESTUARINE SANCTUARY GRANT AWARD
FOR
OLD WOMAN CREEK, ERIE COUNTY, OHIO



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SUMMARY

( ) Draft (X) Final Environmental Impact Statement

Department of Commerce, National Oceanic and Atmospheric Administration, Office of Coastal Zone Management. For additional information about this proposed action or this statement, please contact:

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or
Phillip Johnson

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Washington, D. C. 20235
Phone: 202/634-4241

1. Proposed Estuarine Sanctuary grant award, Old Woman Creek, Erie County, Ohio

   (X) Administrative Action ( ) Legislative Action

2. It is proposed that a grant be awarded to the State of Ohio to acquire, develop, and operate an estuarine sanctuary in Erie County, Ohio, pursuant to the Coastal Zone Management Act, as amended. About 637 acres of land and water, including Old Woman Creek and surrounding lands, will be acquired and protected. If implemented, this proposed grant will be awarded by October, 1978.

3. The acquisition and operation of the estuarine sanctuary may restrict land and water uses and prohibit mineral exploitation within the sanctuary boundaries.

4. Alternatives considered:

   A. Alternative estuarine sites within the Great Lakes region as potential candidates.
   B. Alternative boundaries for the Old Woman Creek proposal.
   C. Alternative management policies for the proposed sanctuary.
   D. Alternative methods of protection for the proposed sanctuary.
   E. Alternative courses of action for the Office of Coastal Zone Management:
      (1) Award grant in modified form.
      (2) Delay awarding the grant.
      (3) No action.

5. List of all Federal, State, local agencies, and other interested parties from which comments were received:

Federal Agencies
Department of Agriculture
  Soil Conservation Service
Department of Defense
  Army Corps of Engineers, Buffalo District
Department of the Interior
  Ohio Cooperative Wildlife Research
  Office of the Secretary
Department of Transportation
  Coast Guard
  Federal Highway Administration, Region 5
Environmental Protection Agency
  Regional Administrator, Region V
Nuclear Regulatory Commission

State
Ohio Cooperative Fishery Unit
Department of Transportation
Toledo Metropolitan Area Wide Council of Governments
Office of the Governor

Local
Berlin Township Trustees

Other Parties and/or Speakers at Public Hearing

Anderson Acres Inc.
architecture research construction
Bowling Green State University, Firelands Campus
Erie County Farm Bureau
Firelands Audubon Society
The Firelands Community Bank
Huron County Farm Bureau Federation, Inc.
Lake Erie Advisory Committee
League of Ohio Sprotsmen
League of Women Voters of Ohio, Lake Erie Basin Committee
The Nature Conservancy, Ohio Chapter
North Central League of Women Voters
Oberlin Beach Association
Ohio Biological Survey
Ohio Edison Company
Ohio Farm Bureau Federation, Inc.
Pennsylvania, Department of Environmental Resources
The Pillsbury Company
Vulcan Materials Company
Margaret Battle
Mr. and Mrs. Bill Brandt
Jeanne Buchele
Ann Churchill
Charles F. Corbeil, Sr.
Mr. and Mrs. Donald H. Davis
Mrs. Henry Graefe III
Charles B. Hartley
Henry B. Heiser
Marilyn Hooper
Mrs. Ralph Huttenlocher
William F. Kaiser
Jacob O. Kamm
Lee A. Kamps
Eula D. Klenk
Mrs. John G. Lamb
Harvey C. Lisle
Margaret McBride
Margaret A. Murray
Mrs. Marian Nemeth
Ruth Perrine
Skip Huxtahhe and Dianne Pierce
Mrs. J. Rainger
Mrs. Thomas C. Surdyck
Debby Sutter
Mary K. Windau
Mr. and Mrs. R.L. Winters

6. Comments

The FEIS was revised from the DEIS on written comments received and statements made at the public hearing. Comments from interested parties were submitted as follows:

Federal Agencies....	8
State.....	4
Local.....	1
Other Parties.....	25
Speakers at the public hearing....	21

All written comments received are included in Appendix 1. A summary of the comments (written and given at the public hearing) is discussed below.

1. A number of comments reflected a concern over the size of the sanctuary in terms of:
   a. including too much valuable farm land,
   b. including the entire watershed, particularly without just compensation.

° Based on these concerns the proposed area was reduced to 647 acres from 980, and the proposed management program for the watershed was eliminated.

Most of the 647 acres will be purchased in fee simple and the balance in the form of life estates, lease backs, easements, etc., dependent upon the owners' desires.

2. Concern was expressed over the classification of the Oberlin tract classification.

° The previously proposed zoning of the sanctuary has been dropped. The overall management program will consider the nature of the purchase and feasible uses of the various sub-components of the entire sanctuary.

3. Many were opposed to control over adjacent land.

° As indicated in response to 1. above, the proposed control of the adjacent land has been deleted from the project. All control of adjacent land will be according to applicable existing local, State, and Federal statutes and programs.

4. Concern was expressed over loss of agricultural production.

° The boundaries of the project have been altered thereby reducing the number of acres of farm land to be taken out of production. Over 300 acres have been removed from the project.

5. Concern was expressed over erosion of tax base.

° A large amount of high value farmland has been removed from the project. The net effect on the tax base will depend, however, on the ultimate value of the adjacent lands owing to the establishment of a sanctuary.

6. It was indicated that agricultural interests should be represented on the Advisory Board.

° Provision has been made for agricultural representation.

7. The DEIS was criticized for containing low estimates of crop yield.

° Reference to specific crop yield and values have been deleted owing to their variation from year to year depending upon weather conditions and market demand.

8. Many expressed the desire to control recreational use of the area.

° The management program will be to maintain the area for estuarine research and educational programs. Minimal recreation will be allowed.

9. Concern was expressed that the area should not be allowed to become a "blackbird sanctuary."

° Significant concentrations of blackbirds would no doubt be an abnormal stress on the estuarine area, and, therefore, suitable control measures could be implemented.

10. The inclusion of "Zone III," the Old Woman Creek watershed, led to concern that the livelihood and way of life of hundreds of people and the capital value of thousands of acres of farmland would be endangered to further the concept of the estuarine project.

° "Zone III" has been eliminated.

11. The question was raised as to how Federal funds could be used and when they are not available from where would they come.

° Federal funds will be made available for property acquisition, development of the sanctuary management system, and for 3 years of management up to 50% of the total cost. After 3 years management funds are the State's responsibility.

12. The question was raised as to how the property will be acquired.

° All lands will be appraised according to Federal appraisal standards to arrive at a fair market value. Each property owner will be negotiated with according to provisions of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646).

13. Questions were raised as to the function, formation, and structure of the Advisory Committee.

° The Advisory Committee will be formed and structured according to provisions of the FEIS, page 2. Nomination for the various categories of representation can be made by interest groups, private organizations, or individuals.

14. Concern was raised that the proposed project was not coordinated with the Ohio Division Office of Federal Highway Administration and the Ohio Department of Transportation.

° The Department of Natural Resources has done so.

15. It was indicated that the DEIS did not acknowledge that the highway right of way was already acquired, and certain statements about the project were unsupported.

° The location of the highway as proposed is acceptable to both the ODNR and OCZM and is no longer an issue. It is anticipated that construction of the highway project will be done so disruption of the estuarine system is minimal.

16. It was suggested that detailed soil maps be included in the FEIS.

° An appropriate map is available upon request from ODNR.

17. It was suggested the farmland remaining in the new boundaries be identified as actual cropland, pastureland, and woodland.

° Estimates with regard to land use remaining in the new boundaries for the above categories are: Marshland - about 125 acres; Forestland - about 135 acres; and Croplands and Pasturelands - about 275 acres.

18. It was indicated that a proposed 2-unit nuclear generating station may be located in the Old Woman Creek watershed.

° The nuclear power plant is still under active consideration. However, the plant, per se, if built, will not be on the Old Woman Creek watershed. A portion of the tract of land is in the watershed but the proposed physical location of the plant is not.

19. A series of questions were raised as to the lack of detail with respect to uses of the area for recreation, by wildlife, and as a harbor of refuge.

° The area is totally in private ownership and any use outside that of the owners or their guests would be trespassing. If the area is used as a harbor of refuge at present, sanctuary status will not nor cannot preclude this use.

Inventories of wildlife in the estuarine area or any other candidate area do exist. Basically the area contains representative flora and fauna of the overall geographic area. Any one area will differ from others in some respect as to quantity and variety of flora and fauna.

20. It was suggested the FEIS should reflect evidence that compliance was made with the Advisory Council on Historic Preservation Procedures for the Protection of Historic and Cultural Properties (36 CFR 800).

° A letter from Thomas H. Smith, State Historic Preservation Officer, Director, Ohio Historical Society addresses this comment (see Appendix 2).

21. Concern was expressed that inadequate knowledge was exhibited as to the degree of "pollution" of the area.

° The ODNR will undertake, with funding assistance from OCZM, a water quality monitoring program to more specifically ascertain the impact of chemicals and particulate materials by the various activities in the area.

22. Concern was expressed that tracts of land would be split purchased.

° Split purchasing will not be pursued unless the property owner desires to retain that which is not needed for the sanctuary. Where owners are desirous to sell contiguous lands outside these boundaries, such purchases will be made.

7. The draft environmental impact statement (DEIS) was transmitted to the Council on Environmental Quality on April 4, 1975, and made available to the public on April 15, 1975. A public hearing was held on this proposal on May 15, 1975 at 7:30 p.m. in the auditorium of the Firelands Campus of Bowling Green State University in Huron, Ohio. A notice of this meeting appeared in the Federal Register, as well as the Sandusky Register, at least thirty days in advance of the meeting.

As a result of the public process the project boundaries and management program were modified as described in the response to comments.

The final environmental impact statement (FEIS) was received by the Council on Environmental Quality on _____ .

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APPENDICES

1. Written Statements from Parties Who Commented on the Draft Environmental Impact Statement
2. Letter from Thomas H. Smith, State Historic Preservation Officer

I. INTRODUCTION

In response to the intense pressures upon and conflicts within the coastal zone of the United States, the Congress passed the Coastal Zone Management Act (P.L. 92-583) (the Act was included as Appendix 1 in the draft environmental impact statement and is available upon request from the Office of Coastal Zone Management). The Act authorized a new Federal program to be administered by the National Oceanic and Atmospheric Administration (NOAA), in the Department of Commerce, to assist and encourage States to develop and implement rational programs for managing their coastal resources. The Act affirms a National interest in the effective management, beneficial use, protection, and development of the coastal zone and provides grant programs to the coastal States and territories toward that end. The Coastal Zone Management Act was substantially amended by the Congress and the amendments were signed into law on July 26, 1976 (P.L. 94-370). The composite of the two acts will be referred to herein as the CZMA.

Section 315 of the CZMA establishes an estuarine sanctuary program which provides for grants to States on a matching basis to acquire, develop, and operate estuarine areas to be set aside as natural field laboratories. These estuarine sanctuaries will be used primarily for long-term scientific and educational purposes, especially to provide some of the information essential to coastal zone management decision-making. Examples of such objectives might include:

- To gain a thorough understanding of the ecological relationships within the estuarine environment.
- To make baseline ecological measurements.
- To serve as a natural control in order to monitor changes and assess the impacts of man's stresses on the ecosystem.
- To provide a vehicle for increasing public knowledge and awareness of the complex nature of estuarine systems, their values and benefits to man and nature, and the problems which confront them.
- To serve as a center for public education programs, including an information center and interpretive lecture series, about estuarine systems.

In order to ensure the sanctuary program adequately represents regional and ecological differences, the guidelines for the estuarine sanctuary program establish a biogeographic classification scheme which reflects geographic, hydrographic, and biologic characteristics. Eleven different biogeographic categories are established and defined in the guidelines; subcategories of this basic system will be utilized as appropriate to distinguish major sub-classes of the system.

In January, 1975, the State of Ohio submitted to the Office of Coastal Zone Management (OCZM), NOAA, an application for an estuarine sanctuary to be located at the mouth of Old Woman Creek and a portion of the surrounding lands in Erie County, Ohio (See Figure 1). The OCZM prepared a draft environmental impact statement (DEIS) for review and comment by all interested public, State, and Federal agencies and individuals. A public hearing was held May 15, 1975, at the Firelands Campus of Bowling Green State University in Huron, Ohio.

II. DESCRIPTION OF THE ACTION

The State of Ohio's grant application requested $898,925 to be matched by equivalent funds, for the acquisition, development, and operation of the proposed sanctuary. Based on the public response from the DEIS and the public hearing, OCZM has decided to make a grant for a modified estuarine sanctuary. The modifications, basically boundary changes, are shown in Figure 2.

The proposed sanctuary will include approximately 647 acres of submerged lands, marsh, woods, plains, and barrier beach, all of which are privately owned. The lands will be acquired by the Ohio Department of Natural Resources (ODNR) using either State appropriated funds or contributions from conservation organizations together with Federal matching funds. The Department will use any or all of the following methods of acquisition: easements, fee simple, fee simple plus life estate, and eminent domain. The ODNR will declare the area a State nature preserve under the State Natural Areas Act.

The purpose of the Ohio sanctuary is to ensure the long-term protection of a freshwater estuary for the study of natural relationships within the ecosystem, for the assessment of human impact on this type of estuary, and for a public education program emphasizing the value of estuaries. The application proposed a management program for the sanctuary designed to maintain and protect the natural functions and values of the Old Woman Creek estuary for long-term scientific and educational uses. A master plan will be developed to ensure the uses of the proposed lands are consistent with both estuarine and nature preserve guidelines.

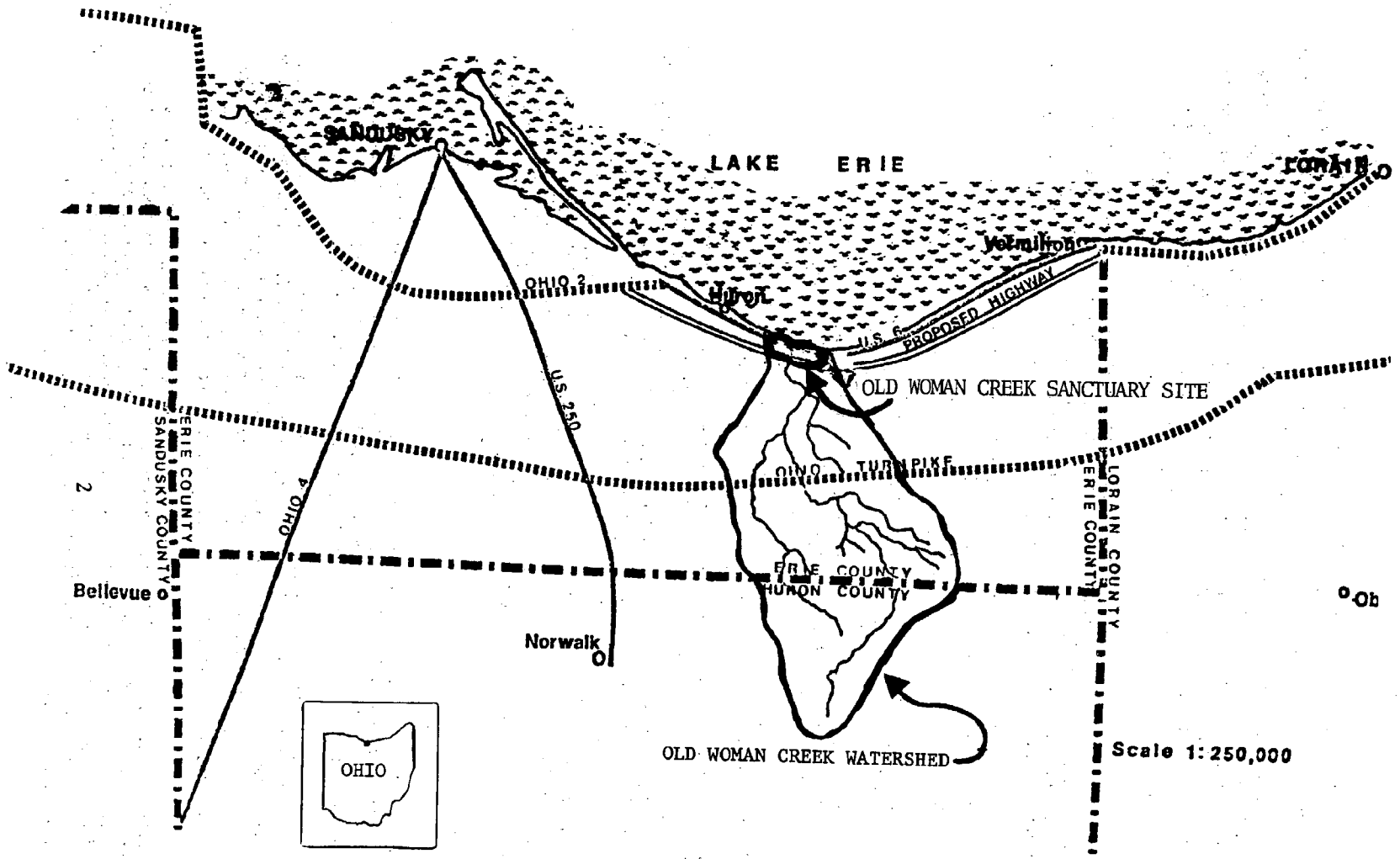
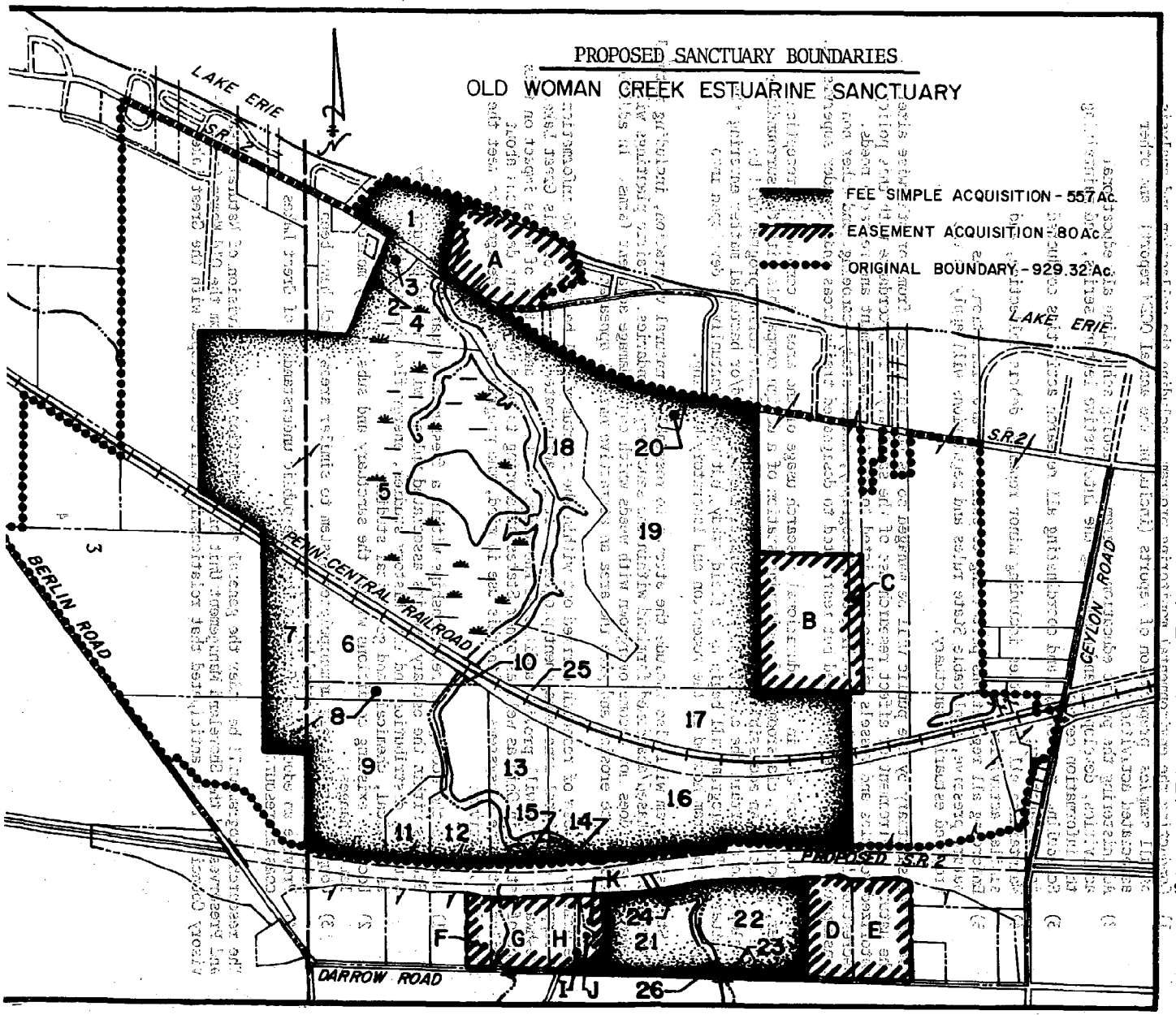


Figure 1. Location of Old Woman Creek



FEE SIMPLE ACQUISITION

1. Margaret A. Murray
2. C.B. & J.L. Hartley
3. Hartley
4. C.B. & J.L. Hartley
5. Anderson Acres, Inc.
6. Anderson Acres, Inc.
7. William F. Kaiser et al
8. William F. Kaiser et al
9. Fred & Merritt Willgrube
10. Edward Walper-Lizzie Walper Life Estate
11. C. & S. Long
12. Alma E. Landberg
13. Clasman P. Stocker
14. R.H. & J.C. Fix
15. C. Stocker
16. W.E. & G.J. Jenkins
17. Edward Walper-Lizzie Walper Life Estate
18. Oberlin Beach Ass'n.
19. Edward Walper-Lizzie Walper Life Estate
20. Edward Walper
21. Lester W. Hoffman-Frank B. Hoffman
22. L.A. & M.A. Schuh
23. Erie Co.
24. State of Ohio
25. Edward Walper
26. Erie Co.

TOTAL ACREAGE = 557 Ac.

EASEMENT ACQUISITION

A. Oberlin Beach Ass'n.
B. Elizabeth H. Greeno
C. Elizabeth H. Greeno
D. R.R. & L.S. Koggle
E. Addison Hoffman
F. E.J. & E.M. Schedley
G. Clasman P. Stocker
H. C. Stocker
I. C. Stocker
J. Fix
K. R. & J. Fix

TOTAL ACREAGE = 80 Ac.

The "ORIGINAL BOUNDARY" initially was proposed to encompass 929.32 acres.

Figure 2

The authority to acquire, protect, and administer these lands as a sanctuary is vested in the ODNR, which administers the Ohio Natural Areas Act. The Division of Natural Areas and Preserves of the ODNR will have the final decision in all matters relating to the management of the sanctuary. An advisory council, the Old Woman Creek Advisory Council, will be appointed by the director of ODNR to advise the Division of Natural Areas and Preserves in the preparation and implementation of specific plans concerning this sanctuary. The Council will be composed of one member each from a local government agency, the Natural Areas Council, a local or statewide public interest group, one local member of an agricultural institution, two members from Ohio educational institutions, and one member from a Great Lakes research institution.

A full-time sanctuary manager and assistant will be employed to oversee all activities within the sanctuary and be responsible for:

1) Conducting the environmental monitoring program, including the collection and analysis of all samples, preparation of reports (including the annual OCZM report), and other associated activities;
2) Administering the public education program, including scheduling all educational activities, developing and conducting the interpretive lecture series, and maintaining the information center;
3) Scheduling, monitoring, and coordinating all research activities conducted in the sanctuary;
4) Maintaining all facilities including minor repairs, debris collection, and similar activities;
5) Enforcing all regulations pertaining to public use and visitation. As a nature preserve, applicable State rules and regulations will apply to the proposed estuarine sanctuary.

Use of the sanctuary by the public will be managed so as not to detract from, or otherwise alter, the natural environment or affect research use of the sanctuary. In accordance with this policy, motorized vehicles and vessels will be restricted to sanctuary management and research needs. Recreational uses such as bird watching and photography, nature study, canoeing, and other non-consumptive uses will be permitted but restricted to designated trails areas and/or under supervision.

To further ensure and aid in the educational research usage of the area, a combination reception center, laboratory, classroom, and monitoring station of a design compatible with the surroundings will be built at an accessible location. A statistically valid monitoring program will be developed to ascertain the amounts of particulate, chemical, and/or bacterial matter entering the sanctuary. The program will begin as a field study, but will eventually be developed into a permanent program housed in the reception and laboratory building.

The State's program will also include the attempt to reestablish natural vegetation, including natural prairie, on purchased/abandoned farmland within the sanctuary boundaries. Prairie plantings will ensure the area does not become overgrown with weeds which could damage adjacent farms. In addition, grasses will reduce erosion and give the area an attractive natural appearance.

The primary purpose of research carried out within the sanctuary will be to provide information in support of coastal zone management programs. It is anticipated the study of this Great Lakes freshwater estuary will provide additional knowledge of the type and extent of man's impact on this type of estuary in Ohio as well as other States attempting to make management decisions about similar estuarine ecosystems. With this use in mind, the program has been designed to meet the following objectives:

1) Analyze the ecological relationships within a freshwater estuarine environment. Studies within the estuary and its associated uplands will include productivity studies, distribution and life history studies, energy flow dynamics, as well as physical, chemical, and geological studies;
2) Document existing conditions within the sanctuary and subsequently monitor later changes;
3) Compare a relatively unmanipulated system to similar areas which have been more extensively affected by man; and
4) Provide an educational focus to increase public understanding of Great Lakes coastal resources.

The research program will be under the general administration of the Division of Natural Areas and Preserves and the Shoreland Management Unit of ODNR with advice from the Old Woman Creek Advisory Council. It is anticipated that relationships will be developed with the Great Lakes

Sea Grant participants, primarily through Ohio State University's Center for Lake Erie Area Research (CLEAR), which is presently developing a Sea Grant program. Other ODNR divisions, including Wildlife, will have input into the research programs.

Public education is recognized by the Ohio Natural Areas Act as an essential component in the preservation of Ohio's remaining natural areas. Interpretive trails and an information center will be developed with minimum alteration of the present area. Lecture series and small group workshops will also be offered. The development and implementation of this program will be subject to the rules and regulations of the State's nature preserve program.

All uses of the sanctuary will be closely monitored and coordinated by the sanctuary manager. Based on this monitoring and the results of any other research and information, the potential or actual effect of each use in the sanctuary will continually be reassessed, and the management program altered as necessary to maintain the long-term health of the estuarine ecosystem. Ultimately responsibility for all portions of the sanctuary program lies with the Division of Natural Areas and Preserves of the ODNR.

Adjacent land uses will be controlled according to existing or future local, State, or Federal statutes or plans. It is anticipated these jurisdictions will administer their programs or responsibilities so as not to jeopardize the integrity of the sanctuary. The Division of Natural Areas and Preserves has eminent domain authority, so ODNR can acquire any additional land which might be needed to protect the area.

III. DESCRIPTION OF THE ENVIRONMENT AFFECTED

Old Woman Creek is located on the south central shore of Lake Erie, approximately two miles east of Huron, Ohio. The 10-mile creek, draining an area of 30.4 square miles, is submerged at the mouth and degrading upstream. The hilly topography of the area is primarily a result of glacial till and moraines left by receding glaciers. Historically, more than 30 meters of glacial material were deposited on bedrock consisting of shale (near the mouth) and sandstone (further upstream). Subsequently, several lakes covered this area, depositing interlaminating beds of silt, clay, and sandy loam. The sandstone bedrock is exposed near Berlin Heights, approximately five miles south of Lake Erie, where a 20 to 25 meter canyon has been carved by Old Woman Creek. The shale/glacial/lake deposits are exposed on several bluffs at Oberlin Beach and along Old Woman Creek at its mouth. Sandstone is currently being mined on a small scale one mile west of Berlin Heights, about four miles upstream. The only known operational gravel pit is located near the stream's source is Huron County.

The climate of this region is characterized by large fluctuations of temperature and precipitation, however, extremes of temperature rarely occur either in summer or winter in this area as the proximity of Lake Erie moderates the weather considerably. The summers are moderately warm and humid while the winters are cloudy and cold. In only three out of five winters are subzero (Fahrenheit) temperatures expected to occur, although the mouth of the creek freezes during the winter. The area experiences rapid weather changes as fronts pass through the area every few days. Precipitation, though highly variable, falls year-round with autumn generally being the driest season.

At present, a shifting barrier beach blocks the mouth of the creek during periods of low water. Recent high Lake Erie waters have caused the smaller eastern portion of the barrier beach to migrate landward several meters per year. In the last two years, the high water has also forced the narrow western part of the barrier beach to migrate landward more than 30 meters.

The estuarine area, defined by the upstream extent of Lake Erie water, is considered to extend approximately a mile upstream and consists of marshes, the stream bed, and a 15 acre island within the marsh (see Figure 2). Much of the marshland has, however, been submerged by the high Lake Erie waters of the past few years. The shore on both sides has steep slopes, backed by eight meter bluffs. The vegetation associated with the sand bars, barrier beach, and marsh are typical of Lake Erie shorelands. Great variety and numbers of species are present, including sedges, cottonwood, cattails, water lilies, and swamp rose. Pinkweed (Polygonum pensylvanicum var. eglandulosum), which is included in the proposed Federal endangered plant species list, also occurs in the area.

The estuary provides excellent spawning habitat for a variety of Lake Erie fish species including northern pike, bowfin, largemouth bass, black and white crappie, and brown bullhead. The area also contains a relic population of flathead catfish. The marsh area contains the type of habitat necessary for some of Ohio's endangered fish species (spotted gar, pugnose minnow, and banded killfish) which are potentially present.

The Old Woman Creek area is utilized by both migrating and local waterfowl. Although ducks are the primary species, geese, swans, egrets, and herons are also seen.

Within the sanctuary boundaries, the wooded areas are immediately adjacent to the estuary. The wet wooded areas and flood plains associated with the estuary are characterized by sycamores and red maples. On the bluffs, the predominant species are white oak and hickory, although the understory associated with them varies. Recent logging of the southern sections of the woods is believed to be the cause of the different types of understory found. These woods support a wide variety of wildflowers, songbirds, and such mammals as woodchuck, fox, and raccoon.

Within a few of the fields no longer cultivated within the proposed sanctuary are relic populations of big bluestem, Indian plaintain, whorled rosinweed, and prairie rose.

Present recreational uses, such as fishing, hunting, canoeing, and ice skating are limited principally to the private property owners on either side of the creek. The creek is considered a navigable waterway, thus the public has access to the area from Lake Erie by canoe or small boat. In general, public use of the area has been on a small scale.

Although still possessing many features of a relatively unaltered estuary, man has changed the surrounding lands both inside the proposed sanctuary boundaries and within the Old Woman Creek watershed. The soils within the general area of the proposed sanctuary are considered some of the highest yielding soils in Erie County. In addition, the moderating effects of Lake Erie increase the growing season from an average 165 days at the Erie-Huron county line (7 miles south of the Lake) to an average 198 days on the lands within the proposed sanctuary boundaries. Corn, wheat, and soybeans are the principal crops in the pooposed acquisisition area (and in the watershed of the creek), however, oats, sugar beets, and hay are also grown. The number of acres planted to a given crop, the crop yield and crop value varies from year to year. However, the agricultural lands are more procuctive than the average for the county.

Silt, salt, nutrient (primarily nitrate and phosphate), and pesticide loads are present within the creek. Sediment from agricultural lands and construction creates some turbidity. Nitrates measured in December, 1974, at 18 mg/liter, approached Ohio's Environmental Protection Agency standards for nitrates of 20 mg/liter. Other nutrients have not been measured. The only pesticide measured has been DDT and metabolites. Samples taken in February, 1975, indicate sediment concentrations of about 10 ppb on a wet weight basis (22 ppb on a dry weight basis).

Development in the Old Woman Creek area has been limited. Berlin Heights, about four miles upstream from the mouth, is the only incorporated town within the watershed. Limited strip development has occurred in four places near the proposed sanctuary boundaries: on State Route 2/U.S. Route 6 to the east and west of the stream; along State Route 61, east of the proposed sanctuary boundary; and on Berlin Road west of the proposed sanctuary boundary. At present, the lakeside developments are utilized primarily on a seasonal basis and then not at full capacity.

These areas of human habitation are also sources of sewage. Occasional overflows of septic tanks in Berlin Heights do enter the creek several miles upstream from the sanctuary. Because of the distance, this probably does not affect the proposed sanctuary area. Oberlin Beach, a development on the east shore of the mouth of the creek, discharges trickle-filtered sewage directly into the estuary. The sewage facility (secondary treatment) on Anderson Acres empties into the estuary as well. It is believed their effect on the estuary is minimal, although the situation has not been fully investigated.

The proposed sanctuary is influenced by activities associated with existing roads. At present, the most detectable influence is associated with salting the roads during the winter months. The salts used for de-icing are a combination of sodium and calcium chloride plus nitrate or phosphate to prevent clumping of the salt. Chlorides measured within the proposed boundaries of Old Woman Creek Sanctuary during December, 1974, reached values exceeding 400 mg/liter, more than one and one half times Ohio's EPA chloride standards (250 mg/liter chloride). Sodium promotes the growth of blue-green algae, a unicellular plant typical of polluted lakes and streams, including some areas of the Great Lakes. The nitrate and phosphate associated with de-icing procedures will increase the quantity of available nutrients already present, and may have been at least partly responsible for the high nitrate levels measured at the same time.

Construction of alternate State Route 2 may bring about several changes to the environment surrounding the proposed sanctuary. The planned interchanges at Berlin Road and State Route 61 will make the area more accessible and desirable for development. Noise levels will increase as will the potential for air pollution. The two critical effects which will result from construction of this highway are pollutant runoff and alteration of the Old Woman Creek streambed south of the proposed highway. Immediate adverse effects will be created during construction as a result of silt, debris, etc., associated with building the road. Runoff of oil, grease, asbestos, and salt (during the winter months) associated with highway use after construction could have a long-term adverse effect on the estuary. Settling ponds may be employed to mitigate the impacts from runoff.

Efforts have been made to ensure that construction of the highway will take place with minimal disturbance to the marshes and creek. Regulations set forth in Item 207 (Temporary Water Pollution, Soil Erosion, and Siltation Control) of the Ohio Department of Transportation's "Construction and Material Specification Manual" are expected to minimize the hazards from silt and erosion during construction. The construction design of the highway will be consistent with Ohio's State Implementation Plan for attainment and maintenance of air quality standards in accordance with Federal air quality standards.

Based upon observations of past years, the temporary inflow of chlorides from road salts is of short duration and has not caused any recorded wildlife fatalities, although it undoubtedly does have an impact. The State is monitoring the water in the estuary to determine the base salt conditions so actions may be taken to ensure future conditions do not exceed present conditions. A quarterly sampling program is in progress.

IV. RELATIONSHIP OF THE PROPOSED ACTION TO LAND USE PLANS, POLICIES AND CONTROLS FOR THE AREA

The proposed action is consistent with the Erie Regional Planning Commission's designation of the area as a conservation area.

Presently the proposed sanctuary lands and the watershed lands are zoned for commercial and residential use, although most of the land is presently in agriculture. The city of Huron is expanding towards Old Woman Creek and the proposed highway will make the area more accessible and desirable for development. Strip development has already occurred east and west of the mouth of the creek, and there are plans for another development on the east bank of the creek.

The State of Ohio has placed its coastal zone management program under the Shoreland Management Unit of ODNR. Planned studies and educational programs are expected to provide information to aid the Shoreland Management Unit and management programs throughout the Great Lakes region in making decisions on utilization of coastal zone resources.

V. PROBABLE IMPACT OF THE PROPOSED ACTION ON THE ENVIRONMENT

The grant from OCZM will enable the State of Ohio to acquire and protect a portion of Old Woman Creek and its surrounding lands for use as an estuarine sanctuary. The creation of this sanctuary will have a number of both beneficial and adverse impacts. The most direct environmental impact of this action will be the long-term assured use of the area and its resources for scientific, educational, and other compatible purposes.

The sanctuary, as a base for education and research, should enrich our understanding of estuarine ecosystems and resources. This is an essential element of the State coastal zone management program. A sound scientific base and a controlled long-term monitoring program should improve the capability of such management programs to cope with the issues and conflicts which occur in the Nation's coastal zone. The sanctuary, which has been carefully chosen as a representative estuary for the Great Lakes region, will provide a control area to use as a basis for measuring the success of coastal land and water management efforts not only in Old Woman Creek, but in other Great Lake estuaries as well. Furthermore, this sanctuary should provide basic knowledge necessary for more complete understanding of estuarine biological and physical dynamics.

The proposed educational program will provide a vehicle for increasing public knowledge and awareness of the complex nature of estuarine systems and their problems, and will therefore contribute toward increased public understanding and acceptance of coastal zone management activities.

The sanctuary will provide suitable habitat for stocks of fish, wildlife, and migrating and indigenous waterfowl which have been severely stressed in this region by loss of habitat and degraded water quality. Protection of the marshes and wetlands will also serve to protect and maintain water quality. The proposed plans for reestablishing indigenous prairie species should also provide a unique opportunity to reestablish the character of the land as the early settlers saw it. Establishment of the sanctuary will also permit long-term maintenance of the aesthetic values the area now provides.

Creation of a sanctuary at Old Woman Creek will have both positive and negative socio-economic impacts. Positive effects include increased funding for field research grants, funding for management of the sanctuary, and increased educational use of the area. Property values of adjacent lands may increase. Potential negative effects might include reduction of tax base, loss of mineral extraction potential, loss of single family and multi-family housing potential, and loss of agricultural productivity. If the value of adjacent property increases as the result of the sanctuary, loss of tax base may be offset.

Designation of the sanctuary may have both positive and negative effects on property values. It may decrease the potential resale value of some property zoned commercial. Tracts zoned commercial might not sell for as much as they would have in conjunction with the proposed residential development. The sanctuary may increase adjacent residential property values. As the amenities of the estuary are preserved, adjacent properties may become more desirable for residential and recreational uses.

The sanctuary will have an impact on potential employment patterns only to the extent to which it prevents commercial employers from locating in the area. Since the area will probably develop mainly as a residential community, the sanctuary should not cause the relocation of any large employers and thus should not have an impact on employment.

Protection of the area as a sanctuary will mean that mineral reserves in the area and the watershed will not be fully utilized. There are currently no plans to mine shale deposits within the sanctuary boundaries. Existing and future mining in the area is subject to review under State guidelines, and will be more stringently controlled if it affects the sanctuary.

The sanctuary will have minimal impact on recreation and fishing as those activities currently are at a very low level. There is no commercial fishing in the area and recreational activities are minimal because of the private control of lands surrounding the creek. However, designation of the sanctuary may increase recreational demands in the area surrounding the sanctuary.

Designation of the sanctuary will result in the loss of some agricultural lands. However, some loss of agricultural lands is already occurring in the area, as they are converted to residential use. The new proposed highway will probably hasten this trend.

Designation as a sanctuary will mean five to nine families will have to move from the area or experience some change in their life style. Under existing Federal law, The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, these families will be compensated.

In summary, a significant long-term impact may be the redirection of population growth and distribution which will be created by the establishment of the sanctuary. Acquisition for an estuarine sanctuary may remove the increasing pressures for urban sprawl, the sanctuary could provide the focus for a continuation of present land uses.

The net environmental impact of an estuarine sanctuary in Old Woman Creek will be to encourage a productive and harmonious relationshp between man and his environment. Protection of the estuary for long-term educational and scientific uses should stimulate a more thorough examination and understanding of the relationships between man's activities and the environment.

VI. ALTERNATIVES

At all stages in the development of this estuarine sanctuary proposal - including at the county government, State resource and planning, and Federal review stages - an examination was made of alternatives to the proposed action. These included consideration of:

A. Alternatives to the site selected,
B. Alternative boundaries for this sanctuary,
C. Alternative management programs,
D. Alternative methods for protection, and
E. Alternative course of action for OCZM, including the "no action" option.

As a result of the DEIS process an alternative boundary and management program were selected.

A. Alternative Sites

During the development of the proposal, a number of sites were examined by the State of Ohio as potential candidates for an estuarine sanctuary. Inputs were requested from research institutes and universities throughout the State. Three potential sites were investigated as possible estuarine sanctuaries: Maumee Bay, Green Creek in Sandusky Bay, and Old Woman Creek. Before action could be taken, the Maumee Bay site was purchased by the State using Bureau of

Outdoor Recreation funds and will be developed as a State park. Green Creek in Sandusky Bay was rejected because the area had been altered by waterfowl management practices; the marshes were diked and managed by a duck hunting organization for waterfowl production. Other potential marsh sites within Sandusky Bay were diked and managed for waterfowl production, thus making them unsuitable for an estuarine sanctuary.

Old Woman Creek is the least altered site available and provides an opportunity to acquire the creek, some woodlands, and fields to be returned to original prairie grasses or woodlands, thus better representing a natural unit of the Great Lakes estuarine system.

The OCZM considered the possibility of a Great Lakes class sanctuary in other States bordering the lakes. However, these other proposed sites are either not as suitable as Old Woman Creek for this program, or are in various stages of preparation and have not yet been processed.

B. Alternative Boundaries

Several alternative boundary schemes were considered. Inclusion of the entire watershed (over 30 square miles) within the sanctuary was discounted as not essential to establishment of the sanctuary and too expensive.

Since the primary interest is in the estuary and its contiguous lands, it would seem reasonable to extend the southern boundary to include the southern reach of the estuary. The estuary is considered to extend 850' south of Darrow Road; however, the proposed route of State Route 2 was felt to be a physical barrier to operational sanctuary management.

Another alternative considered would be to expand the boundaries, especially at the mouth of the Creek, to the west and east. This boundary would include Oberlin Beach and the trailer parks in the proposed sanctuary. These lands are presently developed; relocation costs associated with their acquisition were considered too expensive.

Also considered was the possibility of excluding (from the sanctuary boundary) those lands surrounding the estuary proper that are presently used for agriculture. This would reduce the cost of the sanctuary and allow the continued agricultural use of the land. However, it was felt these contiguous lands were an essential part of the estuarine ecosystem and were also essential to the protection of the estuary itself.

In the DEIS the boundaries, based on the above considerations, were drawn along existing property lines to avoid splitting land ownerships. This was done in an effort to avoid leaving owners with nonmarketable parcels of land. However, further consideration of public hearing testimony has resulted in the boundaries being modified as illustrated in Figure 2.

C. Alternative Management

The determination of the management policy, especially the selection of compatible uses, the types of research, the prohibition of conflicting uses, and the choice of management agency is another issue involving many alternatives.

The program could have been administered under any of several different agencies. Designation as a nature preserve, under the administration of the ODNR, offers the best potential for protecting and adminstering the proposed sanctuary. The various agencies under the ODNR involved in planning, implementing, and administering the sanctuary, plus advice from the Old Woman Creek Advisory Council, will ensure a wide range of resource and research expertise. They will also provide the long-term perspective and continuity for managing this program with respect to its objectives and to its relationship with other similar programs.

The lands could have been used for intense recreational purposes as well as educational and scientific uses. Indeed, the State formally considered making the area a park for day and overnight use. Due in part to public response, and in part to the research needs, the State concluded the area could best serve as an estuarine sanctuary. Intense recreational use is inconsistent with the functions and objectives of an estuarine sanctuary/nature preserve.

An alternative research program could have included manipulative types of research, i.e., experiments conducted to determine the reaction of the estuary to stresses such as artificially administered pollutants. Manipulative research is not consistent with the estuarine sanctuary provisions of the CZMA. The long-term objective of ensuring protection as a natural field laboratory, and the desire to have a natural control area to measure man's impact on other estuaries, precludes any manipulative or destructive research. The major research benefits will derive from long-term studies of ecological relationships within a freshwater estuary.

D. Alternative Methods of Acquisition and Protection for the Proposed Sanctuary

In the course of developing its application for an estuarine sanctuary, Ohio examined a variety of possible funding sources and alternative methods of protection. At one time or another, those included were:

a) Federal Acquisition
   1) Pittman-Roberts Fund
   2) Dingell-Johnson Act
   3) Migratory Bird Conservation Fund
   4) Endangered Species Act
   5) Land and Water Conservation Fund
   6) Estuarine Sanctuary Program
b) State Acquisition
   1) Lake Erie Acquisition Funds
   2) Natural Areas Acquisition Program

Ohio receives several million dollars annually from the Pittman-Roberts Fund and the Dingell-Johnson Act, to be used for wildlife habitat restoration and fish habitat restoration respectively. Although monies exist in these funds, they have already been allocated to projects for game habitat restoration. These generally include a manipulative management program which would not be entirely compatible with sanctuary objectives. A similar consideration applies to the Migratory Bird Conservation Fund. This nationally distributed fund for the purchase of Federal migratory bird sanctuaries also has objectives which differ in purpose from the proposed sanctuary. The Endangered Species Act differs in purpose and since there are no known Federally-endangered animal species within the proposed sanctuary, funds from this source would not be appropriate. Funds available through the Land and Water Conservation Fund have been appropriated for other projects that provide recreational uses of the land.

Matching State funds will come from the State and conservation organizations. This money is to be used for acquisition of land only, for such purposes as beaches, recreational areas, and, in this case, an estuarine sanctuary.

E. Alternative Courses of Action for OCZM

Because the estuarine sanctuary program is basically one of Federal response to State initiatives, the alternatives for Federal action are limited. The OCZM could have accepted the application as presented, or requested modification, but awarding a grant in either case; or refused to accept the application and declined the grant. The OCZM has worked with the State of Ohio since it first indicated interest in the estuarine sanctuary program, and OCZM's input has caused some modification of the proposal.

Delay of the grant would have permitted other States within the Great Lakes classification to develop estuarine sanctuary proposals for submission to NOAA. However, the States are not in direct competition for designation of a single sanctuary, and the award of a grant does not preclude other grants in the same region if an appropriate sub-category is identified. Delay of the grant will permit the potential for further destruction of the estuarine area.

Unless the application lacked merit, the outright refusal to award a grant would have served no purpose. Indeed, in view of the widely acknowledged need for such a program (for example, the National Estuary Study, 1970 and Ketchum, 1972), such action would be contrary to the public interest.

The State of Ohio has received a coastal zone management program development grant (Section 305) and is moving to develop its management program. Because of this, Ohio is in a position to utilize fully an estuarine sanctuary. The research and education results it produces will contribute greatly to the timely completion of the State's task.

After careful consideration of the proposal, the public comments on the DEIS, and after negotiation with the State, OCZM has decided to issue a grant. However, changes have been made regarding the boundaries (nearly 300 acres of agricultural land deleted). All property rights included in the sanctuary will be purchased or easements obtained as shown in Figure 2. Good real estate practices will be followed to ensure owners are properly compensated.

VII. PROBABLE ADVERSE ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED

There are three potentially adverse environmental impacts within the sanctuary boundaries which may not be avoidable. These are: (1) the loss of resource use, (2) restrictions on land and water use, and (3) loss of tax revenues.

Agriculture is the economic resource within the sanctuary boundary which will be most affected by the proposed action. Agricultural practices may continue at present levels on land under easement; however, it will cease in purchased lands. Landowners will, of course, be compensated for the easements.

Restrictions will be placed on land and water use within the estuary. These provide protection to the marsh areas, allow research to occur, and will provide some limited public access. Existing mineral deposits, principally shale, within the proposed sanctuary boundaries will not be mined; thus, such resources will be lost to consumptive use.

As previously discussed, public acquisition will remove 647 acres from existing tax rolls.

VIII. RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

While designation of the proposed estuarine sanctuary will restrict local short-term uses of the environment, it will also provide long-term assurance that natural resources and benefits of the area will be available for future use and enjoyment. Without sanctuary designation, intense short-term uses and gain, such as provided by intense residential development, might be realized. However, such uses would most likely result in long-term restrictions on use and benefit because of degradation of environmental factors. Without some additional control, the traditional conflicts between estuarine users - residential, commercial, industrial, and wildlife - could be expected to occur.

Research information derived from the estuarine sanctuary over the long-term will assist in the coastal zone management decision-making process, and the public education will provide a basis for the wise use of the estuarine resources. These results, which will apply to areas other than Old Woman Creek, will help avoid conflicts and mitigate adverse impacts caused by man's activities in the coastal zone.

The proposed sanctuary will protect this natural estuarine system, thus directly contributing to the long-term maintenance of this environment. In addition, the estuary will serve as a refuge for part of the living resources of the Great Lakes requiring this type of habitat for survival.

Changes in the management program to include extensive monitoring should benefit managers of other programs such as area wide planning under section 208 of the Federal Water Pollution Control Act, Soil Conservation Service programs, and State implementation of the Agriculture and Urban Sediment Pollution Abatement Program.

Individual landowners will benefit by knowledge of nutrient, herbicide, and insecticide loads that may be entering the estuary from agricultural and/or housing operations.

IX. IRREVERSIBLE OR IRRETRIEVABLE COMMITMENTS OF RESOURCES INVOLVED IN THE PROPOSED ACTION SHOULD IT BE IMPLEMENTED

Within the proposed sanctuary, there are no resources which will be irreversibly or irretrievably lost since the resources will be protected, not destroyed or removed. However, as the intent of this action is to provide the permanent protection of the estuary and adjacent lands, in practice the agricultural resources will be removed from direct utilization. In addition, the potential for mining shale will be removed.

X. CONSULTATION AND COORDINATION WITH OTHERS

During the preparation of this final environmental impact statement, information and comments were solicited or received from Federal, State, and local agencies and individuals familiar with the area or the proposal. These include individuals from the Ohio Department of Natural Resources, The Ohio State University, and the Nature Conservancy.

The State of Ohio held four public meetings on the proposal:

1) Erie Regional Planning Commission, August 6, 1974, Sandusky, Ohio.
2) League of Women Voters, November 20, 1974, Huron, Ohio.
3) and 4) Oberlin Beach Association representatives, December 4 and 12, 1974, Columbus, Ohio.

A great deal of public input, pro and con, in the form of letters and calls has been received both by OCZM and the ODNR on the proposal. Under an agreement with the Department of the Interior, OCZM has coordinated this proposal with the Fish and Wildlife Service, which has concurred with the appropriateness of the proposed action.

REFERENCES

Ketchum, Bostwick H., editor, 1972. The Water's Edge: Critical Problems of the Coastal Zone. MIT Press. Cambridge, Mass. 393 pages.

Ohio, State of, Division of Research, Department of Natural Resources, 1975. Aquatic Vascular Plants and Their Distribution in the Old Woman Creek Estuary, Erie County, Ohio. Department of Natural Resources, 53 pages.

Ohio, State of, Division of Planning, Department of Natural Resources, 1975. A Proposal to Establish a National Estuarine Sanctuary in the State of Ohio. Department of Natural Resources, 78 pages and appendices.

United States Department of the Interior, Bureau of Sport Fisheries and Wildlife, 1970. National Estuary Study. U. S. Government Printing Office, Washington, D. C., 7 volumes.

APPENDIX 1

Written Statements from Parties Who Commented

on the

Draft Environmental Impact Statement

UNITED STATES DEPARTMENT OF AGRICULTURE

SOIL CONSERVATION SERVICE

311 Old Federal Building, Columbus, Ohio 43215

JUN 4 1975

May 23, 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
U. S. Department of Commerce
Washington, D. C. 20230

Dear Mr. Galler:

The draft environmental impact statement for the proposed Federal award of a grant to establish an estuarine sanctuary in Old Woman Creek in Erie County, Ohio, that was addressed to the Administrator, Soil Conservation Service, U. S. Department of Agriculture, Washington, D. C., was referred to the Soil Conservation Service (SCS), State Conservationist in Ohio for review and comment.

We have reviewed this draft statement and wish to offer the following comments:

General

Our local SCS representative indicates that he has received numerous inquiries from landowners who have property in and around the proposed sanctuary. He has not received notices of meetings relative to this project, so knows little about the proposal. His inquiries reveal that other local Federal and State agency representatives are also poorly informed. Apparently, there is much local opposition due to lack of available information relative to the project.

Specific

On page 14, second paragraph, soils of the area are mentioned. There are detailed soils maps for all of Erie County. Detailed maps of the soils in the proposed sanctuary area, with appropriate soil descriptions, should be included in the final environmental statement. Such information is basic and necessary to have in evaluating the potential of this project.

Present day crop yields are running considerably higher than those shown on page 14, which were determined by averaging yields of all soil types found within the proposed sanctuary boundary. Typical annual crop yields per acre in the sanctuary area are: corn 120-125 bushels; wheat 45-50 bushels; oats 100 bushels; soybeans 45 bushels; and hay 3-5 tons. Very little hay is grown in the area and probably no sugar beets.

Although the amendment to this draft removes most of the cropland from the proposed take area, the acres of present land use should be shown in terms of Cropland, Pastureland, Woodland, etc.

If a degree of control on land use for one mile beyond the boundary of the proposed sanctuary is to be placed in effect with the implementation of this project, then there should be an explanation of what such controls will do to present or potential land values. What restitution will be made to the landowners if it is shown that the proposed land use control(s) will lower land values. If, as stated, the city of Huron continues to expand in this direction, the effect on land values would be severe.

On page 18, there is little supporting evidence given to backup statements relative to effect on tax revenues.

Sincerely,

Homer R. Hebner
actg

Robert E. Quilliam
State Conservationist

DEPARTMENT OF THE ARMY
BUFFALO DISTRICT, CORPS OF ENGINEERS
1776 NIAGARA STREET
BUFFALO, NEW YORK 14207

MAY 27 1975

NCBED-P

20 May 1975

Mr. Sidney R. Galler
U. S. Department of Commerce
Assistant Secretary for Science and Technology
Washington, DC 20230

Dear Mr. Galler:

Thank you for the opportunity to comment on your draft environmental impact statement on the proposed estuarine sanctuary for Old Woman Creek, Erie County, OH.

The proposed estuarine sanctuary as presented in the EIS will not affect any Buffalo District projects.

We appreciate being kept informed of your activities within the geographical boundaries of the Buffalo District.

Sincerely yours,

BERNARD C. HUGHES
Colonel, Corps of Engineers
District Engineer

5/27/75

OPTIONAL FORM NO. 10
JULY 1973 EDITION
GSA FPMR (41 CFR) 101-11.6

UNITED STATES GOVERNMENT

Memorandum

MAY 2 6 1975

TO : Deputy Assistant Secretary for Environmental Affairs DATE: May 23, 1975

FROM : Leader, Ohio Cooperative Wildlife Research Unit

SUBJECT: Review of DEIS, Proposed Estuarine Sanctuary Grant Award, Old Woman Creek, Erie County, Ohio.

Subject has been completed, and my comments follow. The desirability of establishing an estuarine sanctuary on a Lake Erie watershed is unquestioned. Reasons and purposes are well spelled out in the DEIS. The watershed is far more developed agriculturally than is desired, but alternate sites seem no better in this respect.

Specific comments I wish to make regarding the proposal are the following:

(1) Protection of Zone I lands seems much less than assured and, in fact, seems questionable. For example, effects of the sewage discharges from Anderson's acres (p.15) are unknown. The source of this pollution, in terms of its proximity to the Zone I boundary is not stated; if at the extreme western edge of the Zone II boundary, perhaps this is less of a problem than suggested. In any event, however, sewage discharge into Zone I should not be tolerated.

(2) How will the rights-of-way of the proposed highway be maintained? The problem of salting was addressed but not eliminated. If herbicides are used to control vegetation on the rights-of-way, their ultimate entry into the watershed is assured. Use of herbicides for this purpose ought to be forbidden.

(3) Decreasing the acreage of Zone II lands (DEIS Amendment) is deplorable. Zone I lands cannot be protected and maintained without sufficient buffer lands. The statement, "Although this small withdrawal of lands from agricultural use is so small as to be insignificant..." is misleading, and in fact, may not be true. In particular, the remaining Zone II land on thewest side of the proposed sanctuary site does not seem to be sufficient, particularly if intensive row-crop agriculture prevails, as is likely. A mandatory pasturage type of agriculture on these Zone II lands might provide a sufficient buffer.

(4) Any potential value of the sanctuary, for its stated purposes, can be achieved only if the entire watershed is given adequate protection from development, agriculture, and pollution. Guarantees against these forces are implied but not assured. In any case, the proposed highway should not be looked on as a barrier to southward expansion of the sanctuary. It must be tolerated, and enlargement of the sanctuary to the south should be encouraged.

(5) Unless effects of agriculture, municipal and housing development, and pollution can be severly curtailed or prevented, the sanctuary can never serve as a bona fide source of baseline ecological measurements, and the purpose for its establishment thus would be lost in large measure.

Theodore A. Bookhout
Unit Leader

5010-110

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United States Department of the Interior

JUN 1 [illegible]5

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

JUN 10 1975

In Reply Refer To:
ER-75/413

Dear Mr. Galler:

In response to your request for comments from the Department of the Interior on the draft environmental impact statement on the proposed estuarine sanctuary grant award for Old Woman Creek, Erie County, Ohio, we submit the following response.

In general, the statement is extremely brief. Because of its brevity, it is difficult for the reader to evaluate the ecological value of the proposed sanctuary. In addition, the statement should discuss the impact of the proposed grant and its alternatives in more precise detail.

SPECIFIC COMMENTS:

Ecological Value of the Estuary and Surrounding Area

The draft statement provides only a general description of the estuary and surrounding area. Because of the statement's lack of detail, it is difficult to comprehend the true ecological value of the estuary. The statement would be enhanced by including more detailed maps and photographs of the area. More qualitative and quantitative biological information would also strengthen the statement and should be included. Maps of the area should show cover type, including vegetation, waterfowl nesting sites, and other wildlife habitats. A vegetation map should show the abundance and distribution of the endangered pinkweed (Polygonum pensylvanicum var. eglandulosum) and show the distribution and extent of fallow fields in the area. Fish recruitment, populations, and the estuary's role as a spawning and a nursery area should be discussed in the statement. More discussion of waterfowl use of the area should also be included in the statement. Is this an active nesting site, or is it used only by migratory birds for feeding and resting? In addition,

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the use of the word "degrading" in reference to the watershed is unclear (p. 12).

The discussion and data that are included in the statement indicate that the estuary is not in a natural condition due to the discharge of nitrates, phosphates, chlorides, pesticides, and sewage effluent. Nitrate levels for December 1974 (18 mg./l.) are very close to the Ohio Environmental Protection Agency's limit of 20 mg./liter. If nitrate levels were measured in the spring when fertilizers are applied, the nitrate concentration would probably exceed the Ohio Environmental Protection Agency's nitrate standard. In addition, chlorides were 2 1/2 times the Ohio Environmental Protection Agency's standard of 250 mg./liter when measured in December 1974. Present levels of chloride can be expected to continue after the sanctuary is established due to the use of salt in road de-icing operations. In addition, if farming is allowed to continue within the sanctuary boundary, nitrate and phosphate levels may remain high, despite regulation. Sewage effluent discharge from Berlin Heights and Oberlin Beach will also continue after the proposed sanctuary is established.

Recreation

We do not feel that the draft statement adequately addresses the present recreational use of Old Woman Creek and surrounding area, nor recreational impacts of the proposed action.

The draft impact statement indicates that there is presently some use of the Old Woman Creek and immediate surrounding area for recreation. On page 14 the draft states that this recreational use includes hunting, fishing, canoeing, and ice skating. The level of these activities should be quantified. The statement also does not describe the present and potential use of the estuary as a recreational harbor or harbor of refuge. This information, as well as recreational use planned after dedication of the sanctuary, should be included in the statement. Furthermore, a nautical chart of the area showing water depths and obstructions should be included in the statement so that the possible use of the estuary as a recreational harbor, or harbor of refuge, can be evaluated.

The draft states that visitor use of the Old Woman Creek area is kept at a minimum because the area is presently in private ownership. The draft goes on to state that designation of the sanctuary may increase recreational demands in the area around the sanctuary. This statement should be documented. We are

uncertain as to how this conclusion was reached. If the recreation activities in the area are minimal, their displacement should only create a small increase elsewhere. If a significant increase in recreation demand in the surrounding area can reasonably be expected, this impact of the proposed grant should be discussed in detail in the final statement. This discussion should include disturbance to wildlife and consequent changes in wildlife population levels that can be expected from the increased visitor use of the area after the sanctuary is created. The statement does not describe the amount of hunting and fishing pressures that the area presently receives. Designating the area as an estuarine sanctuary would prevent hunting, thus making the area more attractive to migrating waterfowl. It is unclear, however, whether public fishing will be allowed after dedication. This should be discussed in the statement, as well as the impact of any decision regarding fishing.

Cultural Resources

The statement should present evidence that cultural resources have received consideration, by reflecting consultation with the National Register of Historic Places, and with the State Historic Preservation Officer for Ohio, Mr. Charles W. Pratt, Acting Director, The Ohio Historical Society, Columbus, Ohio 43211. If the establishment of the sanctuary will have an effect on a historic property eligible for National Register listing, the final environmental impact statement should contain evidence of compliance with the Advisory Council on Historic Preservation's Procedures for the Protection of Historic and Cultural Properties (36 CFR 800).

Relationship of the Proposed Action to Other Proposed Land Uses in the Area

The draft statement does not mention the nuclear power plant that is proposed for Berlin Heights. Construction of this plant will destroy use of the Old Woman Creek for scientific study of natural conditions. In addition, the impacts of the proposed rerouting of Ohio/U.S. 6 through the proposed sanctuary should be discussed in detail.

Proposed Management Program

Minimum monitoring of ground water quality should be included in any management program for an estuary used for scientific

study. Monitoring of ground water quality should be undertaken in areas possibly subject to direct pollution and in areas remote from direct pollution. Data on ground water quality can provide an early warning system so that action can be taken to protect the estuary from pollution.

Alternatives

The discussion of alternatives to the proposed Estuarine Sanctuary Grant for the Old Woman Creek site is severely limited. The alternative sites that are mentioned should be discussed in detail. All sites should then be evaluated. Even if the Great Lakes Basin is divided into two biogeographic groups, the site in New York (Grindstone Island) should be fully discussed and compared to the Old Woman Creek site. Since the draft states (p. 13) that pinkweed, which is an endangered species, is present in the Old Woman Creekshed, the alternative of using funds from the Endangered Species Act to acquire land around the Old Woman Estuary should also be considered and discussed in detail.

The discussion of alternative boundaries should also be modified to respond to the boundary change outlined in the amendment to the draft. In our opinion, the proposed boundary changes are significant to this project and its management policies as set forth in the first paragraph on page 5.

Also, impacts associated with this amended sanctuary boundary can be expected to be more significant than those of the original proposal. For example, impacts associated with boundary modifications, especially with reference to the proposed rerouting of Ohio 2/U.S. 6, should be discussed in detail. In the original proposal, the proposed alternate route for Ohio 2/U.S. 6 would be the southern boundary of the sanctuary. Since the amendment to the statement recommends that the boundary be moved south to Darrow Road, the proposed highway will be cutting directly through the sanctuary and any highway fill, among other things, would serve as a barrier to the upstream end of the mixing or estuarine zone. Of course, shifting the proposed highway corridor about 1,000 feet southward (to coincide with Darrow Road) would mitigate this severe impact on the proposed amended south boundary of the sanctuary. Regardless of the location of the highway alignment, special highway

drainage measures would need to be designed in order that the surface drainage from the highway would not add further pollutants to the water resources and regimen in the sanctuary. These impacts should be evaluated in the statement.

Sincerely yours,

Deputy Assistant Secretary of the Interior

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
United States Department of Commerce
Washington, D.C. 20230

JUN 4 1975

DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS:
U.S. COAST GUARD (G-WS/73)
400 SEVENTH STREET SW.
WASHINGTON, D.C. 20590
PHONE (202) 426-2262

• 2 8 MAY 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

Dear Mr. Galler:

This is in response to your letter of 22 April 1975 addressed to the Coast Guard Office of Marine Environment and Systems concerning a draft environmental impact statement for the establishment of a Marine sanctuary in Old Woman Creek, Erie County, Ohio.

The Department of Transportation has reviewed the material submitted. We have no comments to make nor do we have any objection to the establishment of this sanctuary.

The opportunity to review this draft statement is appreciated.

Sincerely,

W. E. Caldwell

W[illegible]WELL
Capt[illegible] Guard
Deputy [illegible] Marine
Environmen[illegible]ems
By direction [illegible]ommandant

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION 5
18209 DIXIE HIGHWAY
HOMEWOOD, ILLINOIS 60430

May 27, 1975

IN REPLY REFER TO:
05-00.5

04 JUN 1975

CZM
Information (TC)
Copy TQO
D. Carl

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
Department of Commerce
Washington, D.C. 20230

Dear Mr. Galler:

As requested, we have reviewed the draft environmental statement for the proposed estuarine sanctuary grant award for Old Woman Creek, Erie County, Ohio, and offer the following comments.

The proposed estuarine sanctuary includes an area through which the relocation of a Federal-aid highway is proposed but the Federal Highway Administration was not consulted prior to the preparation of the draft environmental statement. The statement indicates an awareness of the proposed relocation of Ohio Route 2/U.S. 6 in the southern portion of the proposed sanctuary. However, the statement lacks pertinent information about the proposed highway improvement and in some instances appears to be inaccurate. We, therefore, suggest the proposed action be fully coordinated with the Ohio Division office of the Federal Highway Administration and the Ohio Department of Transportation prior to preparation of the final environmental statement.

The third paragraph on page 15 discusses the proposed highway relocation, but pertinent information omitted from this discussion include: (1) the Ohio Department of Transportation has acquired the right-of-way for the proposed highway alignment on this location and should be so indicated in the discussion and in Figure A-1 of the amendment; (2) FHWA authorized right-of-way acquisition and the right-of-way was acquired under a Federal-aid project; (3) it is expected that ODOT will request Federal-aid funds for the construction phase; and (4) ODOT received location and design approval from FHWA on December 31, 1968, for the proposed highway.

-more-

The last paragraph on page 15 indicates that the effects of channelization of Old Woman Creek upstream from the proposed highway improvement would jeopardize the designation of the proposed area as a sanctuary because of higher stream flow and silt. This statement appears to be unsupported. Studies by the ODOT Hydraulics Section indicate that the channelization will have very little effect on the flow characteristics and sediment loads of Old Woman Creek.

Channelization of Old Woman Creek upstream from the proposed highway alignment is practically impossible to avoid. A change in highway alignment would necessitate the acquisition of additional right-of-way and could result in an unacceptable highway alignment. Due to poor soil conditions and the severe curvature of the existing stream channel, it would be difficult to adjust the highway slopes enough to avoid a channel change. This matter needs further coordination.

The opportunity to review and comment on the draft environmental statement for the proposed estuarine sanctuary is appreciated.

Sincerely yours,

H. L. Anderson
Regional Administrator

By: W. G. Emrich

W. G. Emrich, Director
Office of Environment and Design

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS 60604

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
U. S. Department of Commerce
The Assistant Secretary for Science & Technology
Washington, D. C. 20230

JUN 3 1975

Dear Mr. Galler:

We have completed our review of the Draft Environmental Impact Statement (EIS) for the Proposed Estuarine Sanctuary Grant Award for Old Woman Creek, Erie County, Ohio as requested in your letter which we received on May 2, 1975. In general, the EIS adequately described the proposal and its potential environmental impacts. We do, however, have some comments which should be considered in preparing the Final EIS. The purpose of the project to protect and preserve the Old Woman Creek estuary is consistent with our agency's Wetlands Policy.

We note that the Amendment to the EIS reduces the size of the previously proposed estuarine sanctuary by 305 acres because of local opposition by agricultural interests. The management coordination of the Old Woman Creek watershed (Zone III) will be especially important since this management will determine the success or failure of the project's purpose to ensure long-term protection for the estuary. According to the EIS, the Erie Regional Planning Commission (ERPC) has the primary responsibility and authority for regulating local zoning in Zone III adjacent to the sanctuary; they also have responsibility for local development in the upland reaches of Zone III. The Final EIS should define the exact nature of these zoning and local development controls and the extent to which ERPC will actually be able to control development in the upper watershed.

Since little is known about the current effects of the treated sanitary inflows and septic tank drainage upon Old Woman Creek's water quality and estuary productivity, we recommend the development and implementation of a water quality management plan and monitoring and surveillance program to not only afford a more interpretive and meaningful description of the watershed's environmental setting but to provide an early warning mechanism for preventing adverse water quality problems that may affect the integrity of the estuarine sanctuary. Additional consideration should be given to the current effects of septic tank drainage from upstream communities such as Berlin Heights, Ceylon and Berlinville; effluent discharges from Oberlin Beach, Anderson Acres and the Berlin Heights Waterworks; highway runoff from the Ohio Turnpike, S.R. 2, S.R. 61 and the proposed Ohio Route 2/U.S. Route 6; and agricultural runoff upon water quality in Old Woman's Creek. If possible, the delineation of the creek's water quality zones such as septic zones, recovery zones and clean water zones in the watershed, should be established as a part of the water quality management

6/10/75

plans goals. The EIS should detail more specifically the effects that deicing chemicals have had on the estuary's ecosystem. The potential effects that additional highway runoff (from the proposed highway near the southern boundary of the sanctuary) containing deicing chemicals will have upon the estuary should also be described in more detail. The increased loading of deicing chemicals into the creek should be approximated and compared to the existing loading into the creek; a comparative assessment should then be made of the effects of current loading of deicing chemicals upon Old Woman Creek's water quality and ecosystem's productivity and diversity with the effects of additional loading. The compatibility of the estuarine sanctuary and the new highway could then be determined and, if necessary, highway relocation or mitigative design measures could then be studied and implemented to ensure the sanctuary's long-term protection from this source.

In accordance with EPA procedures, we have classified our comments as LO-1. Specifically, we have no objections to the proposal and we believe there was sufficient information in the EIS to make this determination. The classification and date of our comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act. We appreciate the opportunity to review this Draft EIS.

Sincerely yours,

Donald A. Wallgren
Chief,
Federal Activities Branch

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUL 25 1975

Ms. Deborah K. Curl
Office of Coastal Zone Management
National Oceanic and Atmospheric
Administration
U. S. Department of Commerce
Washington, D. C. 20235

Dear Ms. Curl:

The amended draft environmental impact statement for the proposed Estuarine Sanctuary grant award, Old Woman Creek, Erie County, Ohio, has been reviewed by the Nuclear Regulatory Commission. We have been advised by the Ohio Edison Company of Akron, Ohio, that their application for a two-unit nuclear generating station to be located in Erie County, Ohio, will be submitted to the Commission in the near future. We believe that a portion of the proposed plant site may lie within the Old Woman Creek watershed, and suggest that the Office of Coastal Zone Management take this into consideration in preparing the Final Environmental Impact Statement.

Further information regarding the proposed nuclear plant can be obtained from the Ohio Edison Company and/or the Ohio Department of Natural Resources. Thank you for the opportunity to review this draft environmental impact statement.

Sincerely,

Daniel R. Muller, Assistant Director
for Environmental Projects
Division of Reactor Licensing

cc: Council on Environmental
Quality (5 copies)

MAY 2 8 1975

Ohio Cooperative Fishery Unit

Department of Zoology
The Ohio State University
1735 Neil Avenue
Columbus, Ohio 43210 614-422-8961

COOPERATING AGENCIES

- *U.S. Bureau of Sport Fisheries and Wildlife*
- *Ohio Division of Wildlife*
- *The Ohio State University*

May 21, 1975

02 JUN 1975

CZM
Information

Mr. Sidney R. Galler
Deputy Asst. Sec. for
Environmental Affairs
U.S. Department of Commerce
Washington, D.C. 20230

Dear Mr. Galler:

I am responding to your inquiry of Dr. Richard Tubb to review the draft EIS for establishment of an estuarine sanctuary in Old Woman Creek, Erie County, Ohio. Dr. Tubb is no longer in the area and since I am familiar with the area and the issues, I have taken the initiative to review the EIS and my comments follow.

1. The proposed sanctuary seems to be right in line with the intent of part III, P.L. 92-583. The major importance of establishing a sanctuary on Old Woman Creek is that it is the only remaining undeveloped and relatively undisturbed estuary on the entire Ohio Lake Erie shore line. Its use then as a control area for research into the role of Lake Erie tributaries in the entire lake system is exceedingly important. With the recent advances in pollution control abatement practices in the lake, re-establishment of natural biological populations is becoming possible. In order to do this we must understand the role that such systems as Old Woman Creek play in maximizing the biological potential of the lake. This can then be used as a model for renovating estuarine systems which have been extensively degraded and are no longer productive entities. The EIS is fairly complete in detailing efforts to maintain the area in its natural state. It is obvious that the program planners have considered this a prime concern, as they should have. The zone management system proposed seems to be an ideal way to manage this natural system within the highly developed agricultural community surrounding the proposed sanctuary.

2. It is obvious that agricultural interests in the area are deeply opposed to the proposed sanctuary, since they have expressed such strong concern about the loss of agricultural land. The amendment to the draft EIS seems to be a decent compromise to the agricultural interests. It seems that the potential loss of only about 200 acres is a minimal price for the potential benefits. However, the original plan indicated that the original 518 acres was necessary as a buffer against future development and agricultural pollution. Since this buffer would not be present under the ammended plan, it is very important that the remaining buffer area be completely restored to its natural state and that all precautions against infringement by the adjacent lands be taken.

5/28/75

3. Finally, it appears that of all agencies considered for management of the sanctuary the proposed management by the Ohio Department of Natural Resources is best. These people, as an agency, have more expertise in specialities called for in managing an area of this type than any other state agency.

I hope my comments will be of some help to you in your evaluation.

Sincerely,

Bernard L. Griswold
Acting Unit Leader

BLG/rc

Ohio Department of Transportation

25 South Front Street, P. O. Box 899
James A. Rhodes, Governor

Columbus, Ohio 43216
Richard D. Jackson, Director

JUN 16 1975

June 6, 1975

17 JUN 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary
of Environmental Affairs
United States Department of Commerce
Washington, D.C. 20230

Dear Mr. Galler:

Reference is made to your transmittal of the Draft Environmental Impact Statement for the Proposed Estuarine Sanctuary Grant Award for Old Woman Creek in Erie County, Ohio for the comments of this agency. I further wish to note this Department's call to your office advising that our comments would be several days late, and your office's concurrence that this would be acceptable.

Based on our review of the Draft E.I.S. we offer the following comments. It is our opinion that the issuance of the amendment constitutes a major change in the proposal, and that the document should be reassessed and redistributed as a Draft E.I.S. On page 21 of the Draft E.I.S. it is stated that "the proposed changes in the stream bed of the highway would also preclude inclusion of any lands south of the highway into the estuarine sanctuary." It is further indicated on page 15 that "negotiations have been initiated in an effort to avoid channelization." The Ohio Department of Natural Resources has asked for certain commitments from this Department and we have offered the following comments to their requests:

1. Controls employed by ODOT during highway construction to minimize environmental impacts.

   The Ohio Department of Transportation Construction and Materials Specifications provide procedures for the control of the contractor's operations to minimize the environmental impacts during construction of the project. These procedures prevent the unnecessary removal of vegetation during clearing and grubbing operations and will preserve trees, stumps, and underbrush to the fullest extent possible. Temporary water pollution, soil erosion, and siltation control will be exercised by use of benches, dikes, dams, sediment basins, plastic sheets, mats, coarse aggregates, mulches, grasses, or other erosion control devices or methods as are necessary as the work progresses.

6/16/75

2. Design standards employed by ODOT to minimize impacts caused by daily highway operation (such as hydrocarbon, contaminated runoff, salt runoff from snow and ice control, etc). Commerce is particularly interested in information on the highway sections that will drain directly to Old Woman Creek and how this drainage can be minimized.

   The highway design employed on this project is consistent with normal practices. The highway grade line is depressed for some distance each side of Old Woman Creek with the low point in the profile being approximately at Old Woman Creek. The normal drainage that is generally sheet flow through this area will be intercepted by highway ditches and will be carried to the nearest natural channel. This means that the highway runoff between approximate highway Station 1350± and 1380± will be carried to Old Woman Creek which is located at approximate highway Station 1363±. There is no practical method to substantially reduce the limits of this drainage area.

   Studies made of the effect on adjacent vegetation and streams from contaminated runoff caused by daily highway operation indicate that there is not sufficient proof to indicate that such runoff will have any detrimental effect upon water quality or plant foliage in the area of Old Woman Creek. The highway slopes and ditches will all be covered with grass or other erosion control material and much of the contaminated runoff will be filtered before it reaches the stream.

3. Potential design modifications which could be employed to minimize channelization upstream from the road right-of-way. Three (3) alternatives discussed in the April 15th meeting included extending the bridge, realignment of the highway, and steepened road banks. Costs and the general feasibility of these alternatives should be considered and set forth.

   Design modifications to reduce the channelization of Old Woman Creek have been considered and our conclusions are as follows:

   A. Detail plans have been completed for the project and necessary right-of-way has been acquired. A change in highway alignment is not feasible since such a change would necessitate the acquisition of additional right-of-way and would result in an unacceptable highway alignment.

   B. Extending the bridge would not be practical since at least one bridge would have to be lengthened from its proposed length of 125' to a total length of about 525' at an additional cost of approximately $350,000.

C. The channel change upstream of the proposed highway is about 700' long. It would be possible to reduce the length of channel excavation by about 150' at the upstream end. It would also be possible to change the alignment of the channel change and reduce the total length by an additional 150'; however, the channel alignment would not be the most desirable from a hydraulic standpoint.

Due to poor soil conditions and the severe curvature in the alignment of the existing channel, we cannot adjust the highway slopes enough to avoid a channel change. We would, however, be willing to change the channel alignment to retain as much of the existing channel as we can outside our highway embankment sections.

Based on these comments, which represent this agency's position, it would not appear that the extension of the estuary to the south is feasible.

We note that the map accompanying the amendment to the Draft E.I.S. did not show the lands currently owned by ODOT for the proposed relocation of S.R. 2. This omission could affect the reviews of other agencies and in view of this the map should be updated to show the status of our land acquision.

Although the E.I.S. did allude to the problems associated with roadway runoff on both existing S.R. 2 and the proposed S.R. 2, the document did not state how these items would affect the estuary. Will the ecosystem be damaged? To what extent will the ecosystem be damaged? These items should be addressed in the Draft E.I.S.

We would appreciate receiving notification of your position with regard to the redistribution of the Draft Environmental Impact Statement.

Very truly yours,

Richard D. Jackson

Richard D. Jackson, P.E.
Director

RDJ:lhk

TOLEDO METROPOLITAN AREA COUNCIL OF GOVERNMENTS
420 Madison Ave. / Suite 725 / Toledo, Ohio 43604 / Phone (419) 241-9155

May 29, 1975

02 JUN 1975

Mr. Edward T. LaRoe
Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
Washington, D. C. 20235

CZM Information
Copy to TAO D.Cat

RE: Proposed Estuarine Sanctuary Grant Award,
Old Woman Creek, Erie County, Ohio

Dear Mr. LaRoe:

The Toledo Metropolitan Area Council of Governments supports the proposed Estuarine Sanctuary grant.

It is our recommendation that the estuarine sanctuary boundaries follow the concept as set forth in zone I of the draft Environmental Impact Statement with the exception that the southern boundary should include the full estuary (backflow effect of Lake Erie on Old Woman Creek).

This would permit scientific research and baseline investigations which may relate to other Lake Erie tributaries thereby having both direct and significant impact on Ohio's coastal zone management study.

Such southern boundary for zone I will of necessity require protection from known and proposed developmental activity. The narrowing of zone II on the east and west as depicted in the Amendment to the draft EIS is acceptable other than a necessary extension of the southern boundary for protection of the estuary.

Zone III merely depicts the Old Woman Creek Watershed. However, its delineation permits the potential for watershed management techniques. This could demonstrate the hydrologic importance of the agricultural community in future watershed planning. TMACOG has been actively promoting watershed systems approach in our region.

LOCAL GOVERNMENTS IN LUCAS, WOOD, OTTAWA, SANDUSKY AND ERIE COUNTIES IN OHIO AND MONROE COUNTY IN MICHIGAN COOPERATING TO SOLVE REGIONAL PROBLEMS

The yet to be adopted and enforcement of the regulations of Ohio's Agricultural Pollution Abatement Act and the Urban Sediment Pollution Abatement Act could be implemented by local governmental units. A number of communities in Ohio have already done so. Agricultural interests have always benefitted from good conservation practices. Once the proposed regulations are perceived in proper perspective, acceptance should follow.

TMACOG supports the intent that the proposed sanctuary should be maintained in its natural condition, preferably through its dedication as a state nature preserve.

Sincerely,

June Brown

June Brown
Environmental Associate

JB:dw

cc: Mr. Gary Turner, Administrator
Shoreland Management Program
Ohio Department of Natural Resources

Mr. Hooshang Mahnami, Director
Erie County Regional Planning Commission

Mr. Frederick Deering
Ohio State Representative

STATE OF OHIO
OFFICE OF THE GOVERNOR
COLUMBUS 43215

GOVERNOR
JAMES A. RHODES

STATE CLEARINGHOUSE

April 24, 1975

Mr. Gary V. Turner
Ohio Department of Natural Resources
Building E, Fountain Square
Columbus, Ohio 43224

RE: Old Woman Creek Estuarine Sanctuary, Erie County
COMM-Costal Zone Management
PL 92-583

Dear Mr. Turner:

On March 21, 1975, the State Clearinghouse issued a clearance of the above referenced project with the provision that any comments received during the 30 day review period would be forwarded to you for consideration.

As of this date, no adverse comments were received in the State Clearinghouse. All responses to our office indicated support of the proposal without further comment. Therefore, please consider this letter as notification of the satisfactory completion of the review and comment process as outlined in OMB Circular A-95 revised.

Sincerely,

Nancy Hippert
Coordinator

NH:lem

In Reply Please Refer To: 6-5-2

cc: DOH
DNR
OEPA
OBM J. Hopkins
DECD
EDA
TMACOG

RECEIVED
APR 28 RECD
DIVISION OF PLANNING
DEPT. OF NATURAL RESOURCES

OFFICE OF CLERK

BERLIN TOWNSHIP TRUSTEES

BERLIN HEIGHTS, OHIO 44814

ERIE COUNTY

29 MAY 1975

May 24, 1975.

CZM Information TL

Copy to D. Carl

TQ O

Office of Coastal Zone Management
National Oceanic and Atmospheric Adm.
U. S. Department of Commerce
Washington,
D. C. 20235

Gentlemen:

The Trustees of Berlin Township, Erie County, Ohio want to make known to you their opposition to the establishment of a Estuarine Sanctuary in Old Woman Creek, Erie County, Ohio.

Very truly yours

For Berlin Township Trustees

Wayne Lutes
Erie Regional Planning

JUN 4 1975

VACATION RESORT
COTTAGES
MOBILE HOME SITES
SANDY BEACH

ANDERSON ACRES Inc.
EST. 1839

ROUTES 2 AND 6
TELEPHONE 433-2003
AREA CODE 419

R. D. 1 HURON, OHIO 44839

May 27, 1975

Sidney R. Galler
Deputy Asst. Sec'y for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

Re: Draft Environmental Impact Statement
Proposed Estuarine Sanctuary
Old Woman Creek, Erie County, Ohio

This statement confirms and perhaps expands the informal verbal statement I made at the May 15 hearing on this proposed estuarine sanctuary.

1. Anderson Acres, Inc. owns and/or controls directly or indirectly approximately 30% of the land to be included in the sanctuary.

2. This property has been owned by the Anderson family since 1839. While at one time there was a house, barn and orchard on the island in Old Woman Creek, the buildings are now gone and the vegetation has reverted to a natural state. A serious effort has been made to restrict access to the marshlands and to preserve them in a natural state for more than 25 years. Several thousand trees were planted in the adjoining uplands to further provided a natural habitat for wildlife. Unfortunately most of these trees were destroyed by two fires originating along the railroad right-of-way which crosses the property.

3. The lakefront portion of the property has been open to the public for recreation purposes for nearly 50 years and has a widespread reputation throughout the state. Second and third generations of families are still coming from Ashland, Mansfield, Columbus and other central Ohio cities to vacation on the shores of Lake Erie.

4. Due to passage of time and the tendency to greater mobility of families, the anderson heirs who still retain the ownership of the property are becoming more numerous and are scattered across the country. This has led to the conclusion that it is no longer economically feasible to retain and operate the property as in the past.

5. Appreciation of this heritage which has been preserved--the marshlands in their natural state and the lakefront area still accessible to the general public--has caused the family to hesitate to sell it. It would appear that this proposed sanctuary

Rec'd 5/30/75

is the answer to their prayers--relief from the obligation of maintaining and managing the property while preserving the natural flora and fauna.

6. The complexity of the ownership (including two trusts) along with other factors involved, make it almost a necessity that the property be sold in its entirety--not partially excluded as shown in the proposal.

Thus the owners of Anderson Acres are in favor of the establishment of the proposed sanctuary.

Please send us a copy of the final revised statement.

Very truly yours,

ANDERSON ACRES, INC.

Norma Young

Norma Young,
Secretary-Treasurer

CC: Office of Coastal Zone Mgt.
Edward T. LaRoe
Ohio Dept. Natural Resources

architecture · research · construction
research department
cleveland state hospital
4455 turney road
cleveland ohio 44105

DEC 0 3 1974

TL
TQO
EM

mr robert knecht director coastal zone management 74 nov 25
RE PROPOSED PLANS FOR OLD WOMAN CREEK NEAR HURON OHIO
cc william nye ohio department of natural resources

it is my understanding that the ohio department of natural resources is in the process of preparing plans to be submitted to you to create a SANCTUARY of approximately 900 acres

we at OBERLIN BEACH ASSOCIATION who have worked for many years to preserve this unique area --we are delighted that this may become a reality

EARLIER we were alarmed by plans to create a sanctuary of only about 425 acres we strongly oppose this idea simply because we believe that the area is so small that ANY nearby land use (such as a public campground) would encroach on the habitat of the estuarine

we intend to continue to monitor the plans of the state because it is our concern that a full commitment is made to perpetual preservation of this area we will oppose anything less

THANK YOU

david chapin
architect

Bowling Green State University

Firelands Campus
901 Rye Beach Road
Huron, Ohio 44839

INFORMATION August 5, 1974

Mr. Robert Knecht, Director
Office of Coastal Zone Management
National Oceanic & Atmospheric Administration
Rockville, Maryland 20852

Dear Mr. Knecht:

This letter is intended to express disapproval of recently-announced plans to convert the unspoiled Old Woman Creek area into a State of Ohio public park. The natural organisms and their geologic base simply could not exist if the area were opened to high-use activities of whatever nature.

The creek and land in question remain essentially as they were when this part of Ohio, known as The Firelands, was given to residents of Connecticut who suffered at the hands of the British during the Revolutionary War. In the years since partitioning, in 1808, Old Woman Creek has been spared "improvement". It is entirely possible that we have here the only unspoiled area in this entire state.

In these days of disappearing natural resources, Old Woman Creek and surrounding area should be reserved to serve only limited numbers of individuals with demonstrated interest in the enviroment "as it was" and as a sanctuary for organisms native to this part of Erie County, Ohio.

It is earnestly hoped Old Woman Creek and contiguous reserved lands will provide students of this University an opportunity to study the enviroment of this area as it existed at the time our country was settled. In fact, we covet for all future students--elementary, high school, and college--and from whatever states they may come, the opportunity to study here. Gross misuse of the area by converting it to public high-use park land would erase forever that opportunity and this direct link with our past.

Very truly yours,

J. H. McBride Ph. D.
Coordinator for Community Services

JHM/ljm

Copies: Senator Robert Taft, Jr.
Congressman Charles A. Mosher
Representative Ethel G. Swanbeck
State Senator Robert J. Corts
Director William Nye

Rt. 1
Collins, Ohio 44826
March 16, 1975

MAR 21 1975

Mr. Robert Knecht
N.O.A.A.
Office of Coastal Zone Management
Rockville, Maryland

Copy ltrs TL TLO EM

Dear Mr. Knecht:

At the March 5 meeting, the Board of Trustees of the Erie County Farm Bureau Federation went on record as opposing the entire Old Woman Creek project. It is the Board's opinion that this project is not in the best interest of the community.

We are opposing this project for the following reasons:

1. Too much farmland being taken out of production, especially in Berlin Township.
2. Putting farmers out of business at a time when they've been asked to produce even more food.
3. Uncertain effects the project might have on the regulation of the watershed.
4. Increase in blackbird population, a problem which has been plaguing area farmers.

Sincerely,

Evelyn Johns

Evelyn Johns
Secretary

Firelands Audubon Society

JUN 4 1975

ERIE COUNTY
&
HURON COUNTY
OHIO

On Lake Erie

May 28, 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

Dear Sir:

Re: Old Woman Creek, Erie County, Ohio

After careful review of the Draft Environmental Impact Statement, the Firelands Audubon Society is now, more than before, in favor of the Old Woman Creek Estuarine Sanctuary. We have favored the protection of this area from the start, but did oppose a State Park (camping) for the buffer zone. Old Woman Creek is certainly worthy of protection as an estuarine sanctuary as it supports a vast number of species in it's diverse habitat, and is virtually undisturbed.

Could the National Audubon Society Nature Center and Planning Division have some role as to interpertation of this area and the setting up of a nature center and educational area, which is so badly needed here?

Old Woman Creek is relatively free from polluants, due partially to farming procedures of the watershed. Because of this, we do not know why the farming community is so opposed to the sanctuary, but feel they do not understand the importance of this project to not only the watershed, but the lake at large. Enclosed is a commercial Walleye landing record as an example of what a valuable resource Lake Erie could be and what we have already lost through misunderstanding and misuse of natural environments.

The Firelands Audubon Society strongly supports this Old Woman Creek Estuarine Sanctuary project.

Sincerely,

Donald H. Davis

Donald H. Davis
Conservation Chairman
221 Center Street
Huron, Ohio 44839

Encl. 1

DHD/mmd

5.30.75

Ohio Lake Erie - Walleye Landings

1914-1975

Year	Pounds	Year	Pounds	Year	Pounds
1914	1,724,879	1939	4,442,699	1964	341,908
1915	1,607,105	1940	3,516,924	1965	256,400
1916	1,875,868	1941	2,730,003	1966	162,820
1917	1,476,549	1942	2,826,018	1967	172,597
1918	761,909	1943	2,927,745	1968	303,875
1919	565,355	1944	3,245,004	1969	139,302
1920	828,416	1945	5,031,391	1970	10,258
1921	984,253	1946	5,697,595	1971	*
1922	1,025,579	1947	3,552,714	1972	*
1923	1,023,479	1948	3,603,605	1973	*
1924	791,946	1949	4,924,317	1974	*
1925	1,170,281	1950	5,094,070		
1926	1,179,061	1951	5,418,135		
1927	1,268,670	1952	4,839,833		
1928	1,245,267	1953	5,751,589		
1929	891,126	1954	4,971,155		
1930	1,814,715	1955	5,539,906		
1931	2,540,614	1956	5,867,435		
1932	1,900,386	1957	4,676,015		
1933	1,054,800	1958	3,508,261		
1934	1,167,200	1959	2,978,320		
1935	1,628,050	1960	1,002,224		
1936	2,483,380	1961	593,408		
1937	2,890,277	1962	301,789		
1938	2,891,974	1963	575,182		

* Commercial closure in effect for Walleye.

Ban due To mercury found in fish

Firelands Audubon Society

ERIE COUNTY
&
HURON COUNTY
OHIO

On Lake Erie

Aug. 1, 1974

Mr. Robert Knecht
N. O. A. A.
Office of Costal Zone Management
Rockville, Maryland 20852

Dear Mr. Knecht:

The Firelands Audubon Society urges your support of the Ohio Department of Natural Resources with the protection of the Old Women's Creek estuary in Erie County. This estuary is the only undisturbed estuary in Ohio and should be preserved as a low use, limited access area, with a nature center, and facilities for educational purposes and scientific studies.

Sincerely,

Donald H. Davis

Donald H. Davis
Conservation Chairman
221 Center Street
Huron, Ohio 44839

DHD/mmd

CC: D.N.R. Director Nye
Senator Robert Taft
Represenative Mosher
O. Rep. Mrs. Swanbeck
Myron Swenson

The Firelands Community Bank

MAIN OFFICE
357 MAIN STREET
HURON, OHIO 44839
PHONE (419) 433-5170

BERLIN HEIGHTS OFFICE
24 MAIN STREET
BERLIN HEIGHTS, OHIO 44814
PHONE (419) 588-2095

03 JUN 1975

CZM
Receiv.

TC

REPLY TO:

Huron, Ohio

May 16, 1975

Mr. Mel Rebholz, Chief
Division of Natural Areas and Preserves
Ohio Department of Natural Resources
Columbus, Ohio

Dear Mr. Rebholz:

An important meeting in Vermilion conflicted with your meeting at the Firelands Campus last night. Attached is a copy of the statement which I would have liked to have read at the meeting.

I don't want you to think that I am anti-ecology because of my statement. In fact, I was one of the earliest protagonists of greater interest in this field when most people didn't know what the word meant. I now feel, however, that this movement may have gone too far; and I want to remind you and your group that the battle of protozoan versus the people should be resolved in favor of the people.

You could do an awful lot of good at Sherod Park, and I hope you will give this your first-class attention.

Cordially,

Theodore D. Wakefield
Chairman of the Board

TDW:bjh

Enc.

CC: Dr. Edward T. LaRoe
Richard E. Moseley, Jr.
Gary Turner
Floyd Hoefft
Jack Fisher

Ohio Department of Natural Resources Meeting
7:30 p.m. - East Lounge - Firelands Campus

May 15, 1975

STATEMENT BY THEODORE D. WAKEFIELD

I am Theodore D. Wakefield, 5540 Huron Street, Vermilion, Ohio. I have lived on the shore of Lake Erie since 1912.

I should like to make an emphatic statement that while ecologists may know what protozoan want and need in the way of a sanctuary, I am making this statement to tell you what people want and need in the way of recreation.

All private beach owners know that the public wants access to a sandy beach on Lake Erie. What's more, fishermen want and need a fishing pier, which can be adjacent to such a sandy beach and might even help create it by arresting the drift of sand.

Therefore, I am opposed to the wildlife sanctuary at Old Woman's Creek, and I am in favor of the State acquiring lakefront land between Huron and Vermilion, which is listed for sale, without having to resort to the right of eminent domain.

May I also point out the twenty-acre City of Vermilion owned Sherod Park on Lake Erie which overlooks the rocky nooks and crannies loved by black bass. This already owned public beach is in need of shore protection and a fishing pier, which could accumulate sand and provide access to one of Lake Erie's black bass fishing grounds.

The land is perfect for expanded parking facilities and the development of restrooms and other amenities swimmers and anglers are looking for.

In summary, by all means, let's give people what people are looking for -- a beach and a fishing pier with all the additional facilities to make the combination work.

Ohio Est. Sanct.

Huron County Farm Bureau Federation
P. O. Box 378
Norwalk, Ohio 44857

Office of Coastal Zone Protection
National Oceanic and Atmospheric Administration
Washington, D. C. 20235

17 JUN 1975

CZM Action TC 7/8
Copy D. Curl
EM
TQO

Attention: Edward LaRoe

Dear Mr. LaRoe:

The Board of Directors of the Huron County Farm Bureau Federation requested that the following information be sent to you.

At their meeting, the Board of Directors of the Huron County Farm Bureau Federation unanimously passed a resolution strongly opposed to the restrictions on agriculture in Zone 3 of the Proposed Old Woman Creek Sanctuary. The Board supports the Erie County Board in their opposition to this proposal because it is an infringement upon the rights of those in agriculture to produce the food and fiber needed by consumers both here and abroad. Farmers have for years been vitally concerned with conservation of natural resources and opposed to their destruction by polution but the proposed changes set up by the Office of Coastal Zone Protection are unreasonably severe and would cause farmers to have to close down their operations.

Letters of protest and copies of this resolution have been sent to all local news media and to all state and national senators and representatives concerned with the problems of this area. We suggest that your office do a more thorough investigation of these proposals as they are surely ridiculous as they now stand.

Thank you for your consideration .

Very truly yours,

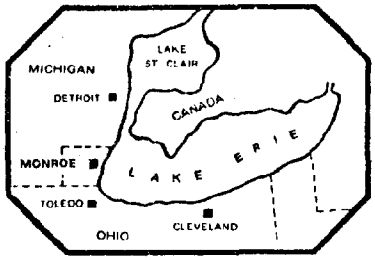
Gretchen B. Hester

Secretary
Board of Directors
Huron County Farm Bureau Federation

This county organization represents approximately 900 family farms.

Lake Erie Advisory Committee

DEDICATED TO THE PRESERVATION OF
LAKE ERIE, ITS WATERS, FISH AND WILDLIFE



Monroe, Michigan 48161

May 19, 1975

Subject: Draft Environmental Impact Statement - Estuarine Sanctuary, Old Woman Creek, Erie County, Ohio.

To: Deputy Assistant Secretary for Environmental Affairs
Department of Commerce
Washington, D.C. 20230

Dear Sir:

The Lake Erie Advisory Committee appreciates the opportunity to comment upon the draft environmental impact statement prepared by the Department of Commerce for the Office of Coastal Zone Management, NOAA, for the proposed Federal award of a grant to establish an estuarine sanctuary in Old Woman Creek, Erie County, Ohio. We support this worthwhile effort under Public Law 92-583.

On pages 18 and 19 of the draft environmental impact statement the word "development" is used frequently. We agree with Mr. Lou Klewer, Outdoor Editor for the Blade, Toledo, Ohio, in his recent newspaper article when he says, "Maintaining one small estuary may be worthwhile, but not if the majority of the wetlands along Lake Erie are lost through what is called development." If it were not for Federal grants and the historic private ownership of marshes along the South shore of Lake Erie, the State of Ohio and local units of government would have allowed drainage and development of wetlands long ago! The City of Toledo is located on the so called "Black Swamp" which teemed with wildlife and fish as one of the most vibrant estuaries in all of the Great Lakes system where the Maumee River debouched into Lake Erie. The Maumee ran clear in those days before development set in - now it contributes more sediment from "land wash" into the Great Lakes system then any other river and its estuary is irrevocably lost while the Toledo industrial complex continues relentlessly to fill whats left of Maumee Bay under the careful guidance of the Ohio Department of Natural Resources and the Ohio Environmental Protection Agency. The effort to secure Old Woman Creek as an estuarine sanctuary pales before this onslaught at the mouth of the Maumee.

On the eve of Governor Rhodes proposal to remove the ban on oil and gas drilling in the Ohio waters of Lake Erie, we applaud this effort as a token gesture but based on Governor Rhodes track record in Maumee Bay where he relinquished over 3,000 acres of bottomlands from the public trust to "development" we must agree with Mr. Klewer's assessment of the situation on Old Womans Creek.

encl. News Article "Wetlands Serve Vital Purpose"

cc Governor Rhodes
Senator Marigene Valiquette
Mr. Lou Klewer
U.S. Fish and Wildlife Service
Ohio DNR
Ohio EPA

Sincerely,

Richard G. Micka

Richard G. Micka
1216 Riverview
Monroe, Michigan 48161

JUN 4 1975

LEAGUE OF OHIO SPORTSMEN

Headquarters, 2404 Cleveland Ave.–Columbus, Ohio 43211

Telephone 263-3818 Area Code 614

May 24,1975

The Honorable Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

Dear Mr. Secretary;

I appologize for the tardiness of this reply, however, the Draft Environmental Impact Statement for the Estuarine Sanctuary in Old Woman Creek, Erie County, Ohio, has at last been reviewed and we are now in a position to comment on the statement.

We have found nothing in this DEIS to be in conflict with any of the established policies of our organization bearing on the areas of water, fish or game management. We feel this sanctuary, as described, will be an asset to the area and urge award of the grant as soon as possible so that the plan may be implemented.

Sincerely,

David R. Warner
President

League of Women Voters
LAKE ERIE BASIN COMMITTEE

5731 Caranor Drive
Kent, Ohio 44240
January 10, 1975

Mr. Robert W. Knecht, Director
Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
Department of Commerce
Rockville, Maryland 20852

JAN 14 1975

Dear Mr. Knecht:

Under the Marine Protection, Research, and Sanctuaries Act of 1972, the Ohio Department of Natural Resources has applied for estuarine sanctuary designation for Old Woman's Creek estuary of Erie County, Ohio in the shore zone of Lake Erie.

The League of Women Voters of Ohio and the Lake Erie Basin Committee of the League of Women Voters strongly support this application. This Inter-League Group, representing 69 Leagues in the Lake Erie Basin, has studied Lake Erie and its shores for eleven years and is very aware of how few natural areas for research are left. Progress in restoring Lake Erie water quality depends on expanding our basic knowledge, including information on the link between environmentally sensitive areas and the pressures of urban development.

Lake Erie has many natural problems and even more man-made detrimental conditions. This area, with existing research facilities close at hand, and with a number of good research groups ready to study Lake Erie's problems further, is an ideal site for an estuarine sanctuary.

Because Old Woman's Creek is located in an urbanizing area, it is important that this application be acted on as soon as possible. We urge your favorable consideration of this application.

Sincerely yours,

Mrs. Lawrence Becker, Land Use Director
League of Women Voters of Ohio

Mrs. Howard Rubin, President
League of Women Voters of Ohio

Mrs. Richard Chase, Coordinator
Lake Erie Basin Committee

National Office
1800 North Kent Street, Suite 800
Arlington, Virginia 22209

THE NATURE CONSERVANCY

OHIO CHAPTER
1504 West First Avenue
Columbus, Ohio 43212
Phone: (614) 486-4194

October 15, 1974

Dr. Edward T. LaRoe
Coastal Ecologist
Office of Coastal Zone Management
Rockville, Maryland 20852

-TL

Re: Old Woman Creek Estuary - Erie County, Ohio

Dear Dr. LaRoe:

I am deeply concerned that all public agencies involved are aware of the importance of all efforts public and private to preserve as much of the natural integrity of the freshwater estuary at the mouth of Old Woman Creek on Lake Erie. This area is unique in the sense that it is the last remaining estuary on Lake Erie in Ohio and possibly elsewhere on Lake Erie which is still primarily under the influences of natural forces. Other similiar areas have been dredged for marinas or other purposes and/or have had artificial erosion devices placed at their junction with the Lake.

The two principal intrusions to date, a railroad and U.S. 6 - Ohio Rt 2, have not severely damaged the area. The current rerouting for a super highway upstream of the estuary is a threat to the area which I am told cannot be further removed. If care and proper construction techniques are used major damage to the estuary should not result. Most of the damage will be to the esthetic value but the very great educational and scientific value of the area will be only shifted, not reduced.

Lake Erie is by far the most productive of our Great Lakes having produced approximately one-half of the combined commercial fish catch of all the Great Lakes*. It is well known that estuaries and the streams that flow through them play a key role in the life cycles of the majority of the earth's lake and marine animals. The implications of the above go far beyond the great economic reasons for preserving Old Woman Creek and using it for active research programs. Since it is one of the last of Lake Erie's estuaries with any semblance of natural conditions its usefulness is outstanding as a benchmark for changes in other estuaries, erosion, various types of pollution, for studying life cycles, etc.

Please do all you can under your power and by cooperating with all parties to preserve, protect, and use for scientific and educational purposes Old Woman Creek Estuary.

Most sincerely yours,

Marshal A. Moser, Jr.
Executive Director, Ohio Chapter

MAM/sar

* Ref. - N.S. Baldwin & R.W. Saalfeld 1962. Commercial Fish Production in the Great Lakes from 1867 to 1960. Tech. Report No. 3 of the Great Lake Fish Commission.

cc: Mr. William B. Nye, Director, Ohio Department of Natural Resources
Mr. J. Phillip Richley, Director, Ohio Department of Transportation
Dr. Charles E. Herdendorf, Director of the Center for Lake Erie Area Research
Mr. William W. Ellis, Jr., Chairman Ohio TNC
Mr. Charles F. Corbeil, TNC, Audubon

ERIE COUNTY, OHIO
North Central League of Women Voters

January 8, 1975

JAN 14 1975

Mr. Edward T. LaRoe
Office of Coastal Environment
Department of Commerce
Rockville, Maryland 20852

- TL
Copys T Qo
Em

Dear Mr. LaRoe:

The Ohio Department of Natural Resources has applied for estuarine sanctuary designation for Old Women's Creek estuary of Erie County, Ohio, in the shore zone of Lake Erie. An alternative plan to develop the same area as a state park has also been submitted. The League of Women Voters of North Central Erie County, Ohio, supports the estuarine sanctuary plan, preferably with the wider boundaries. We, as a state, are attempting to establish an equitable land use policy where wise and proper use of our land resources best meets the needs of today and the future generations. The League supports the sanctuary proposal because in the long range, it seems best to preserve a natural resource. Old Women's Creek is the last and only area of its kind on this side of Lake Erie. It is basically in the same state now as it was when the first settlers arrived here. An abundance of wildlife abide there. We feel, to open a park, would be to doom it. We would like to see it preserved as close to its natural state as possible. We support the wider boundries of the sanctuary because a large buffer zone would be advantageous to preserving the estuary without closing it completely to the public.

We hope you take our concerned opinions into consideration when you are acting upon this issue. We will anxiously await the outcome of the National Oceanic & Atmospheric Administration decisions. We urge you to consider the value of an estuarine sanctuary at Old Women's Creek.

Sincerely yours,

Marcia Goff

Marcia Goff, Land Use Chairman
Anne Johnson, President

MG/AJ:lm

JUN 3 1975

108 South Third Street
Tipp City, Ohio 45371
May 20, 1975

Deputy Assistant Secretary for
Environmental Affairs
Department of Commerce
Washington, D.C. 20230

Dear Sir:

Re: Draft Environmental Impact Statement
Estuarine Sanctuary, Old Woman Creek
Erie County, Ohio.

In response to your letter and to amplify our comments on the Statement which were made at the public hearing on this project, we are indicating below our specific comments and questions on the Statement:

1. Our area north of Routes 2 and 6, by agreement between the Association and the State of Ohio, shall not be purchased in fee simple. We shall either dedicate the area as a nature preserve or enter into a scenic easement arrangement to the area with the State. However, this area is still indicated as being in Zone 1 of the sanctuary as defined in "An Application by the Ohio Department of Natural Resources for a Section 312 Estuarine Sanctuary Grant Under PL 92-583" and in the Statement (page 6). We request that this area be changed to Zone 3 to be consistent with the terms of the dedication or easement and for the following reasons:

(a) The area west of the creek, indicated as the present Murray property, shall house the sanctuary's offices, information center, etc. and consequently, is shown as Zone 2 to be consistent with the uses and restrictions of Zone 2 in the Application and Statement. The inclusion of our area east of the creek in Zone 1 is not practical inasmuch as all of the sanctuary north of Routes 2 and 6 will have the impact of people: the public west of the creek and our residents east of the creek.

(b) As noted above, Zone 1 permissible uses would be inconsistent with the uses which shall be reserved by the Association under the articles of dedication or in the easement. We wish the sanctuary plans to be, from the outset, compatible with the actual uses which shall be permitted there.

(c) Our sewage system - a trickling filter system - is presently approved by the Erie County Health Department, and as indicated in the Application and Statement (page 15), effects the sanctuary only minimally. However, no waste disposal systems are considered a permissible use within Zone 1 according to the Application and again, our area north of Routes 2 and 6 remaining in Zone 1 would constitute a non-conforming use from the outset.

6/2/75

2. The recreational facilities and uses according to the Application and Statement shall be limited to controlled access of the public for hiking, bird-watching, and perhaps, canoeing. Inasmuch as the stated purpose of the sanctuary is to preserve and protect the area, we would be opposed to any further extension of the recreational facilities or to open access to the area.

3. According to the Application and Ohio Revised Code §1541.21, a Special 1-Mile Sanitary District will automatically be created around the estuarine sanctuary. As stated in the Environmental Impact Statement (page 15), the area surrounding the sanctuary has individual and community septic tanks, all presumably granted a permit by the Erie County Health Department. Residents, this Association included, are concerned that the State standards for this Special District do not exceed the County standards which would force us to move, replace or greatly modify our systems at great expense. Should such renovation be required by the State, land owners in the surrounding area would have to be compensated by the State for this expense.

We look forward to a copy of the Final Environmental Impact Statement.

Yours very truly,

OBERLIN BEACH ASS'N

Marilyn L. Hooper

(Mrs.) Marilyn Hooper
President

108 South Third Street
Tipp City, Ohio 45371
August 23, 1974

Mr. Robert Knecht
N.O.A.A.
Office of Coastal Zone Management
Rockville, Maryland 20852

Dear Mr. Knecht:

Re: Old Woman Creek project
Erie County, Ohio

It is our understanding that the Ohio Department of Natural Resources has applied to your office for a grant to purchase and maintain the above-referenced estuarine sanctuary project. We further understand that your Mr. Ted LaRoe was in the area last Friday to study the natural qualities of the estuary.

We have, of course, no idea of Mr. LaRoe's evaluation or recommendations. However, we wish to advise that as owners of some 68 acres in the plan and should the project be completed, abutting property owners, we are very much interested in the estuarine sanctuary <u>if</u> the Department of Natural Resources will eliminate their present plans to add to the sanctuary, a public beach and public camping.

Oberlin Beach Ass'n has been protecting this area for over sixty years, being dedicated specifically to the conservation of the creek, marsh, and wildlife here. It is our contention that the state park aspects of the proposal will introduce far more people into the area than it can accommodate and will eventually and systematically destroy the sanctuary and entire setting. I am sure that Mr. LaRoe was impressed by the area south of the highway bridge, but he could hardly fail to note the tiny beach which the Department proposes to make into the public beach. (The "spit" of beach which Mr. LaRoe may have also inspected east of Mr. Murray's is not part of the beach area, but is indicated as part of the sanctuary. This area presently belongs to Oberlin Beach Ass'n, and we have no intentions of deeding it to the State of Ohio.) Further, the camping area will be in the empty farm fields along the creek. There will be no possibility of keeping the hundreds and thousands of bathers, fishermen, boaters, picnickers, and campers out of the sanctuary.

It is our hope that your office will advise the Department of Natural Resources that an Estuarine Sanctuary and wildlife area would preserve the natural surroundings and that the public camping and public beach are incompatible with protection of the natural resources there.

Yours very truly,

OBERLIN BEACH ASS'N

A-44 Marilyn Hooper

(Mrs.) Marilyn Hooper, President

OHIO BIOLOGICAL SURVEY
INTER-INSTITUTIONAL RESEARCH SINCE 1912

May 20, 1975

105 Biological Sciences Building
The Ohio State University
484 West 12th Avenue
Columbus, Ohio 43210

Phone: 614-422-9645

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
Department of Commerce
Washington, D.C. 20230

Dear Mr. Galler:

I am responding to the draft environmental impact statement prepared by the Department of Commerce for the Office of Coastal Zone Management, NOAA for the proposed federal award of a grant to establish an estuarine sanctuary in Old Woman Creek, Erie County, Ohio.

In general, the draft EIS demonstrates an adequate to thorough investigation and analysis of the site. The biological inventory, although incomplete, recognizes the major existing parameters. Details would be provided only by very intensive investigations and in reality, that is one of the major reasons for the sanctuary project in the first place. Old Woman Creek Estuary is without question the least disturbed (by man) sizeable estuary on the Ohio Lake Erie shore line. It, therefore, offers upon completion of a baseline inventory, the greatest potential to measure natural and man-influenced land and water use processes on this type of ecosystem in this area of the Great Lakes.

Several suggestions are offered as review comments.

Page 14: Yield of sugar beets and hay should be expressed in terms other than bushels per acre per year.

Pages 5, 10: The primary responsibility for operational management regarding Facility Development and Maintenance and Monitoring and Protections should be delegated to the newly established Natural Areas Division of the Ohio

5/27/75

COOPERATING INSTITUTIONS AND MEMBERS OF THE ADVISORY BOARD

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Bluffton College, Richard F. Pannabecker
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Ohio Northern University, Charles C. Laing
The Ohio State University, Charles E. Herdendorf
Ohio University, Warren A. Wistendahl*
Ohio Wesleyan University, William F. Hahnert*
Otterbein College, Jeanne Willis
Metropolitan Park District of
the Toledo Area, Joseph P. Croy
University of Toledo, Elliot J. Tramer
Urbana College, Clara May Frederick
Wilmington College, Thomas K. Wood
Wittenberg University, Nathan J. Bolls
College of Wooster, Donald L. Wise
Wright State University, Jerry H. Hubschman*
Xavier University, Daniel J. Higgins
Youngstown State University, David B. Maclean

* Executive Committee
** Chairman of the Advisory Board

Department of Natural Resources rather than the Division of Forestry. The primary philosophy of the sanctuary and research concept is in more accord with natural areas rather than production.

Thank you for the opportunity to respond.

Sincerely,

Charles C. King

Dr. Charles C. King
Executive Director
OHIO BIOLOGICAL SURVEY

CCK:jkp

OHIO EDISON COMPANY
47 NORTH MAIN STREET, AKRON, OHIO 44308 • 216-762-9661

June 2, 1975

06 JUN 1975

Mr. Edward T. LaRoe
Ms. Deborah K. Curl
Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
Washington, D. C. 20235

CZM Information TL TQO D. Curl

Re: Final Environmental Impact Statement/Proposed Estuarine Sanctuary at Old Woman Creek, Erie County, Ohio

Dear Sir and Madam:

Pursuant to your request for comments on the subject of the Environmental Impact Statement, please be advised that Ohio Edison Company plans to submit written comments. However, due to the fact that the draft was received late last week insufficient time is available.

Ohio Edison Company is presently planning to construct the Erie Nuclear Plant in an area which may conflict with the water shed of Old Woman Creek. Therefore, in order that we may adequately evaluate this undertaking an additional 30 days will be needed. It is respectfully requested that this record be held open in order that we may file our comments. Your help and assistance in this matter will be greatly appreciated.

Very truly yours,

Thomas A. Kayuha
Attorney

TAK:pg

OHIO FARM BUREAU FEDERATION, INC.

245 North High Street, Columbus, Ohio 43216 • Area Code 614 • 225-8711

27 MAY 1975

May 22, 1975

CZM
Information TC

Copy ltr D. Curl

Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
Washington, D.C. 20235

Attention: Edward T. LaRoe

Gentlemen:

Re: Environmental Impact Statement
on Old Woman Creek Project

The expressed and implied desire to own or control the land in the watershed of Old Woman Creek is entirely unacceptable. In this letter we are pointing out some of those areas and other sections that we recommend would be changed in the project.

1. On page 5 you discuss a seven member Advisory Council to be headed by the Director of Natural Resources. We would like to recommend that included on that Council would be representation from agriculture, including one or two full time farmers.

2. On page 7 reference is made in sub-paragraph 2 to "the use of fertilizer, pesticides, etc., if allowed would be under strict control of the Ohio Department of National Resouces". The statement on page 22 discusses management alternatives which include "no cultivation, cultivation with special restrictions or no control over cultivation practices". The statement continues, "prohibiting cultivation or the use of fertilizer and pesticides in the watershed might be desirable for complete protection of the proposed sanctuary.....".

   These statements indicate the desire to control and manage the entire watershed and cannot be acceptable to the farmers in the watershed.

3. The design of zone three in the Enviromental Impact Statement carries with it implications of land control that are outside the jurisdiction of the State of Ohio and the Federal Government.

On page 12, paragraph 3, the statement is made "Use of the upland areas of the watershed under the joint jurisdiction of the OEPA and the Division of Soil and Water Districts".

We are opposed to the word "use" and believe that land use is a decision of the landowner and the local zoning authorities.

4. On page 14 the yield per acre of the crops mentioned is not an average yield for the crops in the watershed. It is our opinion that corn should be not less than 106 bushels per acre; wheat should be some place between 50 and 60 bushels per acre; soybeans from 40 to 45 bushels per acre; oats at least 100 bushels, and sugar beets and hay should be adjusted upward in line with the other recommendations.

5. We believe that the statement on page 14, "Sediment from agricultural practices creates some turbidity throughout most of the year" is incorrect.

Remarks are also made on this page measuring water quality. We believe that soil conservation practices should be the measure and guideline for agriculture and that a measure of water quality from non-point sources is not an acceptable measure for siting the need of control over agricultural production.

The statement on page 15, paragraph 2 clearly indicates that agriculture may not be responsible for undesirable elements contributing to poor water quality.

6. On page 16 the subject of land use plans, policies and controls for the area are discussed. We are in support of the local people, through the planning commission and township zoning board having control of land use decisions and are opposed to new State and Federal action that would remove this right.

7. On page 17, in the last line, reference is made to the loss of agricultural productivity. If the land that goes into the sanctuary is non-agricultural land, why should there be a loss of productivity? This again indicates to the government's desire to control fertilization and management of the farm operations.

8. In the center of page 19 the statement is made "The probable impact (referring to zone III) would result from more careful monitoring of practices regulated by these acts and more strict enforcement of the regulations than might otherwise occur". This appears to be unconstitutional and illegal to apply new regulations or law more stringently in one area than is applied in another.

9. On page 21 it is clear by the wording, "Inclusion of the entire watershed (over 30 square miles) was discounted as too expensive", shows the desire to own and control the watershed which we cannot support. It is our concern that a new administration could change the policies of the Department of Natural Resources and could use the right of eminent domain to acquire a greater portion of the watershed.

10. The desire to control is clearly pointed out on page 22 in the sentence "Since no control over agricultural practices within Zone III could prove damaging to the estuarine sanctuary, it is important to maintain some kind of control over these activities". We are opposed to this control.

11. Since the alternatives for action for Coastal Zone Management include the refusal of the grant, we urge that the grant be refused unless adequate assurance can be made that the estuary could be confined to the area as amended in the Department of Natural Resources proposal. Assurance must also be made that controls in the rest of the watershed would be no different than those applied on any other agricultural land in Ohio.

Thanks for your cooperation.

Sincerely,

Bob Bash

Bob Bash
Director of Local Affairs

BB/ov

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF ENVIRONMENTAL RESOURCES
P. O. BOX 1467
HARRISBURG, PENNSYLVANIA 17120

In reply refer to
RM-R
W 69:18

December 16, 1974

Edward T. LaRoe, Ph.D.
Coastal Ecologist
Office of Coastal Zone Management
United States Department of Commerce
National Oceanic and Atmospheric
Administration
Rockville, Maryland 20852

Dear Dr. LaRoe:

Thank you for your information regarding Ohio's application for an estuarine sanctuary.

Regarding Pennsylvania, we do not plan to submit such an application prior to December 31, 1974; however, we plan to consider estuarine sanctuaries for the next fiscal period.

Sincerely yours,

C. H. McConnell, Deputy Secretary
Resources Management

THE PILLSBURY COMPANY

28 MAY 1975

CZM
Information TL

May 23, 1975

Doctor LaRoe
Office of Coastal Zone
Management
National Oceanic and
Atmospheric Administration
U. S. Department of Commerce
Washington, D. C. 20235

Dear Doctor LaRoe:

Attached you will find an updated copy of Agricultural Statistics, published by the Ohio Crop Reporting Service.

It is our hope that you will consider using another location for the Estuarine Sanctuary due to the economic effects to the community.

If we can furnish any additional figures for your research, please feel free to contact us at your convenience.

Yours truly,

Russell J. Bragg
Eastern Area Operations Manager

Vulcan Materials Company

METALS DIVISION / P. O. BOX 720 • SANDUSKY, OHIO 44870 • TELEPHONE 419 626-4610 • TWX 810-492-2638

June 4, 1975

06 JUN 1975

Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
U.S. Department of Commerce
Washington, D. C. 20235

CZM Information (1 L)

TQO

D.Ch.L

Attention: Mr. E. T. LaRoe, Coastal Ecologist

Gentlemen:

During the Old Woman's Creek Environmental Impact Hearing, the farmers made a big organized showing. Actually, we who are very much in favor of what you are proposing to do could circulate a petition and produce many, many more signatures than the farmers could.

The farmers really control only one-third of the land involved in the project and about one-third of their holdings is not used for corn, etc., but lies almost idle. Their big drive really is to keep the price up, as you very well know.

The law requires industry and farmers to return the stream water they use back to the stream very much more pure than when they took it from the stream. This law is costing industry many billions of dollars. The proposed Zone 3 farmers could be required by the law to put in a dam to clarify the water when the stream passes through their property. They think of manure and fertilizer seepage and are scared.

If Zone 3 is to be controlled by the same laws as the rest of Ohio, there would seem to be no reason to mention Zone 3 in your next Impact Statement. And maybe you could shave the agricultural farmers' land which you take.

The Anderson Acres people had a meeting this past weekend and are planning a squeeze play. They will say either do it by July 1 or we will put our land up for public sale. Very, very many people are just plain greedy.

Population is rising very rapidly in this area. We need Old Woman's Creek Sanctuary now and it will be needed very much more so in the future. I hope this letter may be of some help.

Yours sincerely,

J. G. G. Frost

J. G. G. Frost

JGGF:dj

1. (TL)
2. TQO

Mr. Robert Knecht
N.O.A.A.
Office Coastal Zone Management
Rockville, Maryland

March 28, 1975

Dear Sir,

I am writing to ask that strong consideration be given in favor of establishing the Old Woman Creek Estuarine Sanctuary. As you may know it is one of or perhaps the last unspoiled estuaries on the south shore of Lake Erie. It should be kept as a wildlife refuge preserve in its natural state. Thank you.

Sincerely,

Margaret Battle
16 N. Pleasant St.
Norwalk, Ohio 44857

STARFIELD

WEST LAKE ROAD
VERMILION, OHIO 44089

5/17/75

Mr Ted La Rue

Re OLD WOMAN'S CREEK
SANCTUARY.

3 JUN 1975
CZM
Received

I for it!

We are for it!

Bill & Ila Brandt

2255 Eastbrook
Toledo, Ohio 43613
March 6, 1975

INFO TLDay
MAR 10 1975
OCZM TQO

Mr. Robert Knecht
N.O.A.A.
Office of Coastal Zone Management
Rockville, Maryland

Dear Mr. Knecht:

I believe it's very important that the estuarine area of Old Woman Creek along the southern shore of Lake Erie be preserved in its natural state. Public ownership seems to be the only answer, and I urge that all officials involved continue with the State of Ohio proposal to acquire the land.

Sincerely yours,

Jeanne Buchele

Jeanne Buchele

2518 Old Lake Road
Huron, Ohio 44839
March 27, 1975

1. TL
2. TQO

Mr. Robert Knecht
N.O.A.A.
Office of Coastal Zone Management
Rockville, Maryland

Dear Mr. Knecht

I am writing in response to the letter to the Editor of the Sandusky Register on March 14th, 1975 concerning The Old Woman's Creek Project. I support the concept that this area should be preserved in it's present state, but I do not fully understand why the state feels that without their help it will be destroyed. I see no reason why it cannot be left just as it is. I am definitely against any sort of State Park and Recreational facilities that have been proposed for this area.

A Concerned Citizen

Ann Churchill

400 Stonyridge Drive
Sandusky, Ohio
March 9, 1975

Mr. Robert Knecht
N.O.A.A.
Office of Costal Zone Mgt.
Rockville, Maryland 20850

MAR 1 : OCZM
MAR 1 3 1975 C13-3,
ACTION-TQO
COPY/ltr-(TL)

Dear Mr. Knecht,

The State of Ohio has requested funds from your Department for the establishment of an Estuarine Sanctuary in Erie County

I urge your support for this project. I would like to know the status of this project at this time. Thank you

Yours truly,
Charles F. Corbeil, Sr.

C

August 1, 1974

Mr. Robert Knecht
N. O. A. A.
Office of Costal Zone Management
Rockville, Maryland 20852

AUG 5 1974

Dear Sir:

We urge your support of the Ohio Department of Natural Resources for protection of the Old Women's Creek estuary in Erie County.

Since this estuary is the only undisturbed estuary in Ohio, the need to preserve it as a low use, limited access area is imperative.

Sincerely,
Margaret L. Davis
Donald H. Davis
Donald H. Davis
221 Center Street
Huron, Ohio 44839

CC: William Nye
Robert Taft, Jr.
Charles Mosher
Ethel Swanbeck

JUN 11 1975

May 28, 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

Dear Sir:

Re: Old Woman Creek, Erie County, Ohio

We approve the Draft Environmental Impact Statement for establishment of an estuarine sanctuary, however we feel that a nature center, public education area and passive recreation should be included.

Sincerely,

Donald H. Davis

Donald H. Davis

(Mrs) Margaret L. Davis
221 Center Street
Huron, Ohio 44839

3/27/75

MRS. HENRY GRAEFE III
217 MARSHALL AVENUE
SANDUSKY, OHIO 44870

1. TL
2. TQO

Dear Mr. Knecht,

I am very much concerned about the future of Old Woman Creek in Erie Co. The State of Ohio has proposed acquiring this unspoiled estuary and surrounding buffer zone and establishing the Old Woman Creek Estuarine Sanc. The State, as well as Erie Co., is indeed fortunate to have such a unique natural habitat which if preserved in the correct manner will benefit many generations to come.

I urge you to do everything possible to make this become a reality.

Sincerely,
Alice B. Graefe

2012 Cleveland Road, East
Huron, Ohio 44839
27 May 1975

02 JUN 1975

U.S. Dept. of Commerce
NOAA
Attn: Dr. Edward T. LaRoe
Office of Coastal Zone Management
Rockville, Md. 20852

CZM
Information (TL)
Copy ttr TOO
D. Curl

Dear Dr. LaRoe:

Before the June 1 deadline on comments to the rough draft of the environmental impact statement as presented at the Old Womans Creek Estuary, I would like to make a few suggestions.

Although I found the draft to be generally acceptable, I am concerned in regards to recreational activities in the estuary. I feel that recreation should be limited and controlled. Acceptable recreation uses would be: 1) canoeing on specific days with permits; 2) bird watching - also limited as to time both seasonally and weekly; 3) guided hikes; and 4) a nature center. However, I feel that to allow fishing would be totally alien to the preservation of the estuary. In no way would the inclusion of this sport support the preservation of the estuary.

Of a more immediate concern is the preservation of the estuary until the sanctuary comes into being. The publicity given the area by the news media has awakened people the fact that the Old Womans Creek is a desirable place to visit. We have had a ten-fold use of the creek this year over last and the damage to the estuary is probably proportional.

Reference is made to your letter dated 20 August 1974. You state therein that landowners might be permitted to remain on the land with concurrence of the State. I have had this concurrence from the office of the Department of Natural Resources. Namely, Gary Turner and Tom Vogel. I am now trying to get something more definite and in writing.

I am sorry that I did not have the opportunity to meet you at the Huron meeting. However, the farmers took over the evening. It is my feeling talking with them that they are not opposed to the sanctuary as long as someone will guarantee that their livelihood is not threatened. A simple letter could do it.

Sincerely,

Charles B. Hartley

Charles B. Hartley

H. B. HEISER
(CORNER OF STATE ROUTES 61 AND 601)
PHONE 662-9814

MAIL: R. D. #1

NORWALK, OHIO

August 13, 1974

AUG 15 1974

Mr. Robert Knecht
Coastal Zone Management
National Oceanic and Atmospheric Administration
Rockville, Maryland 20852

Dear Mr. Knecht:

I wish to put into writing my feelings concerning th e Old Womans Creek plans in Erie County, Ohio.

I am very much in favor of having this area used as a "Low Use" sanctuary and naturecenter, primarily for educational use and I am hoping it can be saved for this purpose.

There is no such area left in this part of the state which in its natural state would serve so well for this purpose.

Thanking you in advance for your kind consideration in this matter.

Very truly yours,

Henry B. Heiser

CC: Congressman Chas. A. Mosher
Mr. William B. Nye, Director
Ohio Dept. of Nat. Res.

Mrs. Ralph Huttenlocher
Darrow Road, Route 1
Huron, Ohio 44839

May 28, 1975

TL

Dear Sirs:

We wish to add our opinion to the list of those opposing the Estuarine Sanctuary in Old Woman Creek, Erie County Ohio.

My husband was born nearly 63 years ago in the house we live in - so has lived his entire life here. We live within a mile of Old Woman Creek.

We think it simply ridiculous to spend the amount of money suggested on this project. How many tax payers will benefit from it?

I attended the hearing May 15, 1975, and heard it discussed. This area would be for hiking and canoeing - no bathing or camping.

I don't agree that people can hike and canoe and birds will stay. Yes, the black birds, grackles and starlings - we have been fighting them off our farms for years - but the more rare birds will leave.

and a more protected black bird area - we don't need!

And as for more regulations on what pesticides can be used - another regulation which will give the area farmers more headaches.

Yes, and what about the ~~one~~ sanitary area - the Erie County Health Director or the people on your panel couldn't answer

Can you give us an answer now - on exactly how large an area this will include and exactly what your group has in mind?

With the energy crisis it seems we didn't need to give up more acres of good farm land in our area to the New Route 2 and we still have several miles of it still "hopefully to be completed - perhaps in 1979."

A nuclear power plant contemplated for Berlin township - to take more area out of crop production - not to mention the hazard of pollution getting fuel to the power plant and what of all the thousands of gals the waste will be a hazard and real problem.

Now this - we have a national debt that few can comprehend. And still we have people such as this group thinking up ways of spending more!

Just how many area people did your group think were in favor of what you are suggesting?

How many were property owners involved?

How much money in property and equipment is involved in those opposing - how much is involved in those favoring this project?

If the report we have heard is true Mr. Murray would indeed be the one to profit - again that is not his place of business. He would have everything to gain.

Please send us your answers to the questions asked at the public hearing May 15, 1975.

Again - we are very opposed to the whole project!

Mrs. Ralph Hutterbacher
Dorrow Road, Route 2
Huron, Ohio 44839

Route 2 Box 4
Huron, Ohio 44839
February 20, 1975

Dr. Edward T. LaRoe
Office of Coastal Zone Management
11400 Rockville Pike
Rockville, Maryland 20852

OCZM
MAR 0 3 1975
INFO (TL)
Copy to TQO
EM
JW

Dear Dr. LaRoe;

I am opposed to the application to the Federal Government for a matching grant of $898,000 to purchase 938 acres of mostly good farm land in Erie County, Ohio. It is known as the Old Womans Creek water shed by the Ohio Department of Natural Resources for the following reasons:

1. I have a farm of 98 acres included in this 938 acres of good level farm land which is not a part of Old Womans Creek. This farm is boarded on the North by Penn Central Railroad and 1,000 feet to the south is an interchange of Berlin Road and Interstate Highway I 90 and Ohio Route 2.

2. This land is valuable in the future as a housing developement or for industry because its location is in the Golden Cresent; for its transportation; and all utilities.

3. Our State Representative, Mrs. Ethel Swanbeck called a meeting the 3d of February, 1975, to get the opinions of the farmers in this water shed. They were very much opposed to this take over of this land by the Ohio Department of Resourses.

4. There is 22,000 acres of good farm land in this water shed. They (the D.N.P.) could restrict the use of pesticides; insecticides; fertilizer, manure and things like that. This is what is worrying the farmers on this water shed. What <u>will</u> happen in the future if this proposed State Park and Old Womans Creek Esturine east of Huron is approved?

5. This could be a great loss to our local Shinrock Elevator and the Pillsbury Company which is a seaport.

6. As the American economy is in such a state of depression what we need is more jobs and less marshes.

Yours truly,

William F. Kaiser

13 JUN 1975

JACOB O. KAMM
ROUTE 1, BOX 79
HURON, OHIO

CZM

JUN 11 1975

Information TC May 29, 1975

Copy TQO
D. Curl

Mr. Sidney R. Galler
Deputy Assistant Secretary for Environmental Affairs
Department of Commerce
Washington, D.C. 20230

Re: Draft Impact Statement
Old Woman Creek, Erie County
Ohio.

Dear Mr. Galler:

I am opposed to the proposed estuarine sanctuary for the Old Woman Creek area for the following reasons:

(1) In a question which I addressed to Mr. E.T.LaRoe at the public meeting held in Huron, O., as to whether he could give a guarantee or assurances that no stresses would develop within the 30 square mile watershed area requiring limitations or restrictions in that area on its residents, he answered he could not answer this question definitely. From the time the State of Ohio people announced this project, they have publicly made certain statements which were later proved untrue in subsequent meetings or written Federal application. We can only conclude again that Zone III is "not the same as other agricultural area in the State of Ohio" and that implementation of the project would imevitably destroy some of Ohio's richest farm land - the sandy Milan loam. Thousands of individuals would be involved in this area- if not actually displaced so hampered in farming as to be forced into bankruptcy or liquidation at low prices because of uneconomic farming resulting from pesticide and insecticide limitations. Try farming yourself without the use of pesticides and other chemical helps including fertilizers, you would never succeed.

(2) The importance of agricultural production to pay for the $25 billion of oil imports means that any agricultural production must be carefully studied before it is destroyed forever. You cannot possibly justify this for an estuarine. If you could you would have used the estuarine available to you last year in Ohio at Maumee Bay. You did not take that one which did not interfere with farming so now you want to take one that does destroy a rich farming area and displaces people in the process.

(3) There are many others reasons which make your proposal look extremely weak but give consideration to this one: This proposed estuarine is practically within the heavily populated rural area of Erie County, why not locate one in Lake Michigan or Lake Huron or Lake St. Clair. Are you stating that there is no other estuarine on the Great Lakes? This is unbelievable. It is unbelievable that you would locate this one with two major highways over it

JACOB O. KAMM
ROUTE 1, BOX 79
HURON, OHIO

and one railroad crossing it along with a second railroad south of it in the watershed with the pollution and contamination resulting from it.

But the most important single reason is: With all of the lands set aside in Alaska, the West, and right within Erie County for local, state and Federal parks why do you put private ownership, businesses, and peoples' living needs second to wildlife? I suggest that if you insist on proceeding with this wild-eyed project that you will face court suits over your rights to use eminent domain on something as weak as this. In other words if the estuarine fails to develop, I see no serious effect but much good. If it does develop I see much harm to the many farm families and businesses in the affected area.

Sincerely,

J. O. Kamm

KAMM FARMS, INC.
R. D. 1
Huron, Ohio 44839

JUN 4 1975

May 20, 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary for Environmental Affairs
Department of Commerce
Washington, D. C. 20230

Dear Sir:

Re: Draft Environmental Impact Statement
Old Woman's Creek, Erie County, Ohio

We are strongly opposed to the establishment of an estuarine sanctuary in Old Woman's Creek because it would put restrictions on our farm and the other farms in the watershed area in Erie and Huron Counties. These restrictions would put the farmers almost out of business. Each farmer could claim millions of dollars of damage because future earnings to each farmer would be hampered and restricted by Federal regulations. The farmers will never stand for any restrictions being put on their land by the Federal or State governments because of a sanctuary for fish, birds, and plant life. Are you placing wildlife priorities over human priorities?

We respectfully request that the grant award to the State of Ohio for this project be denied.

Sincerely,

Carl J. Kamm

CJK:jk

Carl J. Kamm
Secretary

LeeA.Kamps
717 Perry St.
Sandusky, Ohio
February 24, 1975

OCZM
FEB 27 1975 B27-3 due 3/20
ACTION TL
Copy TQO

Mr. Robert Knecht
N.O.A.A.
Office of Coastal Zone Management
Rockville, Maryland

Dear Mr. Knecht:

I am writing this letter as a concerned citizen, concerned about the plan by the state of Ohio to acquire the Old Woman Creek estuary and a surrounding buffer zone and preserve it as a natural area. The Old Woman Creek area is located in Erie County, Ohio, near the city of Huron, along the south shore of Lake Erie. It is one of the few remaining undisturbed areas along the south shore, and one of the few untouched areas left in northern Ohio. It is an important stopover for migratory birds, as well as an important sancturay for native birds, wildlife and game animals.

Because of a change in administration in Columbus this year, this plan is in danger of being set aside. Federal funds are available to help in the acquisition of land through your office. I would like our share of this federal money returned to the state of Ohio, rather than being spent in other states. Some interests in the area are opposed to this plan, but their arguements are unfounded. The landowners in the immediate area would like to see this area preserved and would be willing sellers if this plan is adopted.

No other state along the Great Lakes has so little shoreline left in a natural state as Ohio. We need to preserve what little undistirbed areas we have left so future generations can enjoy them and get an idea of what this area was like before settlement. With increasing population and pressure from developers, this area would be ripe for development if it is not preserved. We need patches of open area near our cities for esthetic and educational purposes. We, who live in Ohio, should not have to drive many miles to Michigan to enjoy an undistirbed lakeshore. We need this area of the Old Woman Creek preserved for now and all time. Please use whatever influence you have to keep this area from exploitation.

Sincerely,

Lee A. Kamps

Lee A. Kamps

May 29, 1975

Rt 2
Norwalk, Oh 44857

Mr. Edward T. LaRoe
Office of Coastal Zone Mgmt.
NOAA
Washington D. C. 20235

04 JUN 1975

CZM
Information

Dear Mr. LaRoe

Subj: Old Woman Creek - Erie County, Ohio

After reading the Draft Environmental Impact Statement and attending the May 15 Hearing at Firelands Campus, Huron, Ohio, I still believe that Old Woman Creek is vitally important to our future toward studying, researching, and simply preserving a piece of this planet. Despite all the changes around the area that man has made, it's "all we've got"!

It is a shame that the farmers have already mismanaged their land and have so little understanding of value of it in terms other than dollars.

An estuarine sanctuary means to me something for a tomorrow that only my grandchildren will see. Let us not allow greed to blind their futures.

Sincerely,

Eula D. Klenk

Eula D. Klenk

AUG 5 1974

Route 2,
Norwalk, Ohio
44857

August 2, 1974

Mr. Robert Knecht
Nat'l. Oceanic & Atmospheric Adm.
Office of Coastal Zone Management
Rockville, Maryland 20852

Mr. Knecht:

I call your attention to the marsh area of Old Woman's Creek bordering the south shore of Lake Erie in Erie County, Ohio. It is an area I would hope might be considered for a research/education, low-use santuary.

Recently, newspaper articles imply that the area is being included in state-park plans by the Park and Recreation Division of the Ohio Department of Natural Resources. A state park might destroy the estuary.

The erosion of the shore alone has disrupted marshlands and wildlife habitats. Ohio doesn't have left areas like the Old Woman's Creek area.

Please give this your consideration.

Sincerely,

Eula D. Klenk

Eula D. Klenk

cc: William B. Nye, Director
Ohio Department of Natural Resources
Columbus, Ohio 43215

Charles A. Mosher
Representative to Congress
House Office Building
Washington, D. C 20515

Mrs. John G. Lamb
24449 Cedar Road, Lyndhurst, Ohio 44122

1. (TL) May 22 1975
2. D. Cur 1

Gentlemen

As a citizen concerned about our environment and preservation of our waterways I am writing to urge that the Old Woman Creek in Erie County, Ohio be preserved as an estuarine sanctuary —

I think attention to these individual places is all important so that we don't spend all of our time + money on broad unenforceable legislation.

Very sincerely.

Dorothy Lamb
(Mrs J G)

RD 1
Norwalk, Ohio 44857
November 28, 1974

Robert Knecht, Director
Office of Coastal Zone Management
11400 Rockville Pike
Rockville, Maryland

Dear Mr. Knecht:

This letter is being written in regards to Old Woman's Creek Estuary near Huron, Ohio, bordering Lake Erie. There have been several public hearings concerning this area and discussed was the possibility that the area could go either as a Park or a Natural Wildlife Sanctuary. I will have to speak for myself in this letter but I could add that the residents of the area are strongly opposed to the Park. I, too, am strongly opposed to the Park. I would like to see your office and the state of Ohio take this area over and preserve it pretty much as it is leaving for posterity a remnant of Ohio where they could see what it was like before the white man came to this country.

Sincerely,

Harvey C. Lisle

Harvey C. Lisle

TL
100
EM

RD 1
Norwalk, Ohio 44857
August 4, 1974

Mr. Robert Knecht
Coastal Zone Management
National Oceanic and Atmospheric Administration
Rockville, Maryland 20852

AUG 7 1974

Dear Sir:

I am writing concerning Old Womans Creek estuary located near Huron, Ohio, on Lake Erie. I understand it is being considered as a "low use" sanctuary and nature center.

I played in this area as a boy and have visited it many times between then and now and I am nearly 60. This should make me somewhat of an authority on this area. Unless this proposed use becomes a reality I am afraid in a few years it will be destroyed by commercialization such as marinas or too many people such as parks. The proposed use would be ideal both from a practical ecological standpoint and for its continuing beauty for people who are appreciative of that type of natural area.

I would encourage you you to procede with the proposal to a successful conclusion.

Sincerely,

Harvey C. Lisle

Harvey C. Lisle

cc: Mr. William B. Nye, Director, Ohio Department of Natural Resources
Congressman Charles A. Mosher

CZM
Received
27 MAY 1975

RD 1
Norwalk, Ohio 44857
May 19, 1975

CZM
Information

Cy ltr EM D. Card

Mr. Edward T. LaRoe
Office of Coastal Zone Management
U. S. Department of Commerce
Washington, D. C. 20235

Dear Sir:

This letter is in response to your draft environmental impact statement on the Old Woman Creek estuary, Erie County, Ohio. I am Harvey C. Lisle, listed under OTHER PARTIES. Although I am a member of the Fireland Audubon Society I shall write for myself only as an interested citizen.

Rather than comment directly upon the draft environmental impact statement I should like to comment upon my impression of the public hearing held May 15, 1975 at the Fireland Campus of Bowling Green State University.

The one testimony that "shook me up" more than any of the others was that of the lady testifying in behalf of Anderson Acres, owner of 1/3 of the land bordering Old Woman Creek. She stated that the land had been in her family for over 100 years and they had maintained a defacto santuary. Due to circumstances the Anderson family was now planning on selling their land very soon - if not to the government, then to private developers. If this land should fall into the hands of private developers the ecological loss would be tragic. This should not be allowed to happen.

You know and I know that the agricultural interests "carried the day" at the May 15th hearing. They were all "shook-up"over the 30 square mile zone 3 and maybe rightly so. For over 100 years the Old Woman Creek estuary has apparently done alright and not suffered too much from the agricultural activities within its watershed and along its boundaries. In your final impact statement I would like to see you forget zone 3 - don't get zone 3 involved. Without zone 3, the agricultural interests would lose their weapons. There then would be no effective opposition to the establishment of the estuary.

Granted that this dropping of zone 3 is much easier to write about than to actually do, I trust you know better what I mean than what I say.

Sincerely,

Harvey C. Lisle

Harvey C. Lisle

May 26, 1975

(71)

Edward T. LaRae
Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
Washington, D. C. 20235

Dear Mr. LaRae:

I wish to speak for the Old Woman Creek Estuarine Sanctuary, Erie County, Ohio.

I feel strongly that wild places of beauty and fascination must be saved. Preserving a buffer zone along Old Woman Creek will prevent future desecration of nature which could occur with a housing development, a marina, a motel vacation resort, an industrial plant, —— etc.

The present farmers might tire of farming (right down to the river edge) or they, or their inheritors might think selling to commercial interests attractive financially, and then our natural area of beauty would be destroyed forever.

I live on the Huron River, Erie County, and have seen what marinas and filling of marshes has done.

I hope this Old Woman Creek Estuarine Sanctuary can be made possible. Thank you.

A-78

Very truly yours,

Margaret McBride
P. O. Box 212
Huron, Ohio 44839

MURRAY & MURRAY CO., L.P.A.
A LEGAL PROFESSIONAL ASSOCIATION
ATTORNEYS AT LAW
MURRAY BUILDING
300 CENTRAL AVENUE
SANDUSKY, OHIO 44870

AREA CODE 419
627-9700

EMMETT MURRAY
THOMAS MURRAY (1907-1974)
DENNIS E. MURRAY
THOMAS MURRAY, JR.
W. PATRICK MURRAY
JERRY B. MURRAY
JAMES T. MURRAY
MICHAEL T. MURRAY

May 5, 1975

MAY 14 1975

Mr. Sidney R. Galler
Deputy Assistant Secretary for Environmental Affairs
United States Department of Commerce
Washington, D. C. 20230

In Re: Old Woman Creek

Dear Mr. Galler:

On behalf of property owner Margaret A. Murray, I am submitting her comments concerning the draft environmental impact statement. Her comments simply are that she has and continues to support the entire project and wishes to commend your office for its very thorough review.

Very truly yours,

MURRAY & MURRAY CO., L. P. A.

By: Dennis E. Murray

DEM:wsa

562 Crescent Drive
Huron, Ohio

Mr. Robert Knecht
NOAA
Office of Coastal Management
Rockwell, Md.

1. (TL)
2. TQO
3. D. Curl

Dear Sir:

I am writing to you because I am greatly concerned about the future of the property known as Old Womans Creek located east of Huron, Ohio. I speak both as a native of Huron and one concerned about our environment. I am fully aware of the value of this property and that it is one of 12 in our country but that is not the point now.

What I do fear is that the property will be purchased by a large corporation such as Forest City Enterprises as has been rumored.

I ask you to please help the State of Ohio to purchase this property and to take quick and positive measures to hasten a positive decision on this matter as it is now being discussed in Washington. We can't wait until next year.

Thank you for your support on this matter

Sincerely,

(Mrs.) Marian Nemeth

5/75

SIR,

We are in favor of the "OLD WOMAN CREEK SANCTUARY" For the PRESERVATION OF A TINY PART OF THE LAKE ERIE COASTAL AREA.

THANK YOU,
SKIP HUNTSMAN
& DIANE PIERCE

405 Seneca Avenue
Huron, Ohio
April 18, 1975

1. TL
2. D Curl
3. TQD

Mr. Robert Knecht
NOAA Office of Coastal Zone Management
Rockville Maryland

Dear Mr. Knecht:

As a resident of Erie County, Ohio, I support the Ohio Department's application for estuarine assignation for Old Woman Creek estuary in the shore zone of Lake Erie. Old Woman Creek is the last and only area of its kind on this side of Lake Erie and should be preserves in its natural state.

Sincerely yours

Ruth Perrine

(Miss) Ruth Perrine

3903 Autumn Drive
Huron, Ohio 44839

March 15, 1975

MAR 20 1975

CZM
Information
Copy to

Mr. Robert Knecht
N.O.A.A.
Office of Coastal Zone Management
Rockville, Maryland

Dear Mr. Knecht:

It is my hope that a federal grant will be approved to protect Old Woman's Creek as a wildlife preserve.

Very truly yours,

(Mrs.) J. Rainger

901 Vine St.
Sandusky, Ohio 44870
5-29-75

(TL)

Dear Sir,

I am in favor of the proposed Estuarine Sanctuary for Old Women Creek as it now stands. My only request would be that the impact statement be put into language a little bit easier to read. As it now stands it is very difficult to understand, and as a result a lot of problems have arisen. If it is rewritten in simpler language a lot of difficulties will be solved. Thank you for your time.

Sincerely Yours,

Thomas C. Surdyk

MAY 2 8 1975

May 23, 1975

Mr. Sidney R. Galler,
Deputy Assistant Secretary for Environmental Affairs
Department of Commerce
Washington, D.C. 20230

Dear Mr. Galler,

I'd like to submit my comments concerning the "Draft Environmental Impact Statement," for the Proposed Estuarine Sanctuary at Old Women's Creek, Erie County, Ohio.

In several areas of the first section of the report you say "primary uses of the sanctuary would be for . . .". I feel you may need to clarify the specific uses as much as possible to avoid confusion. On the map, on page three, you show a proposed highway going along the lake. I would like to see a provision made so that this could not be added. Wouldn't this be violating the comment on page seven which says,"existing roads within the area are sufficient . . .?" The proposed highway ould be encroaching on the sancturary. It's bad enough the new Route #2-6 by-pass has to go through with all its bad ecological side effects, let alone add another highway on the other end of the sanctuary. Keep the man-made structures to a minimum! (There's only so many cars that can funnel into the gate at Cedar Point. A new road into the bottlenect would only cause more problems.) I'd like to see you get the Route #2-6 by-pass stopped at Route 61. Seeing that you'd be attempting to maintain an estuarine sanctuary, in its "natural state", couldn't you pull any weight due to all the adverse effects the highway would have on the sanctuary. Anyway, get rid of the proposed highway along the lake.

In regards to the Old Women's Creek Advisory Council mentioned on page five, it might be advisable to include a member of an agricultural group, possibly as the local resident, and to be more specific as to whom the public interest group included would be. I'd hate to see non-conservationists get on the Council.

I'm very much in agreement with the majority of your impact statement. I like the idea that you'll be using existing structures rather than build new ones, page seven. Will there be something written in the rules governing the sanctuary that will control the building facet? I's hate to see sheds, garages, etc., added later. The same goes for roads within the sanctuary. I'd like to see a statement in writing that no more roads will be built, period.

You need to be more specific as to the types of studies that could be done in the sanctuary. In trying to preserve areas we sometimes study them to death. I hope provision will be made for not disturbing the sanctuary in any studies. The alternative research, mentioned on page 22, should not even be considered. Why try to preserve the sanctuary if you've been considering introducing adverse stresses on it? This is ridiculous. I feel you need to limit the types of testing done in the sanctuary and the surrounding zones, more specifically than you have, so that the adverse effects, or man's effects on the sanctuary will not ever be artificially introduced.

A more definate statement about sewage control is needed. At least secondary, hopefully tertiary treatment, should be required in areas around the sanctuary.

On page 22, you say, "no specific examples . . . as to the type of low intensity farming allowed within the sanctuary." There should really be no farming allowed within the sanctuary, especially since the acreage has been cut to lessen the loss of agriculture lands. If farming has to be allowed within the sanctuary, than you'd better be specific as to how low an intensity is permissible.

In your Management Program Administration, page 10, there seems to be too many fingers in the pie. Couldn't you narrow your management? You'd have to have a Management Council as well as an Advisory Council. There's too many people involved with managing this size area.

On page 15, you again mention the new by-pass, which I am adamantly against and wish in the interest of land use you'd try to stop, but you also mention channelization of the creek south of the highway. In considering Zone 111, could not the creek area south of the highway be included, so that channelization could not occur? There's no need for chanelization. Why not include this area of the creek in Zone 111 or some control zone? It seems this is just as important, if not more so, as monitoring the surrounding farm lands. A statement regulating "second homes, parks and campgrounds" in the surrounding areas needs to be incorporated in the impact statement, or in policy for the control of the sanctuary. I believe you need to incorporate some control over the entire creek bed not just portion within the sanctuary boundaries, in order to eliminate threats of channelization, housing, etc., in the sanctuary designation.

You need to make a definate statement about just what being in Zone 111 means. There's too much confusion in farmers minds about this area. I have enclosed a copy of a letter I wrote to the Farm Bureau. I thought you might be interested. The fear of losing cropland to the sanctuary is a bit far fetched when one considers other means by which cropland is disappearing. (See enclosed letter.)

On page 25, you mention loss of tax revenues, after you've already explained the loss to be insignificant on page 18. Why mention tax loss again. This only causes adverse reactions because people forget what they read the first time.

I would have preferred the original proposal of 980 acres but will have to settle for the smaller approximately 675 acres. I am definately in favor of the estuarine sanctuary. If you do not go through with the sanctuary designation, you'd be succumbing to private interests, (farmers), rather than benefiting the public.

Sincerely,

Debby Sutter

(Ms.) Debby Sutter
1320 Hayes Avenue
Sandusky, Ohio 44870

DS/dc
Enclosure (1)

1320 Hayes Avenue
Sandusky, Ohio
March 17, 1975

MAR 21 1975

CZM
Information

Copy Ans.

TL
TQO
EM

Mr. Robert Knecht
Office of Coastal Zone Management
Rockville, Maryland

Dear Sir:

I am writing to you in support of an estuarine sanctuary designation for Old Woman's Creek, preferably with the wider boundaries. This area, the last of its kind in this region, needs to be preserved for mankind's future. We destroy it- we put another unique area on the "vanished species" list. With all our ecological problems today, a major one of which is urban sprawl, we need an area where we can reflect upon what we are doing to ourselves and our world. Please preserve this estuary in its natural state by making it a sanctuary. Could your conscience rest easy carrying the responsibility for destroying or allowing to be destroyed, a rare and valuable area in man's world? Please see fit to have Old Woman's Creek designated an estuarine sanctuary.

Sincerely,

Debby Sutter

Debby Sutter

212 Center Street
Huron, Ohio
May 9, 1975

Dear Mr. LaRae:

Although I will be unable to attend the Old Woman Public Hearing on May 15, 1975, I do want you to know that I am very much in favor of the Old Woman Creek Sanctuary.

Yours truly
Mary K. Windau

Dear Sir: / [redacted]

25 February 1975

It is our understanding that the State of Ohio has previously considered acquiring acreage known as "Old Woman Creek", Huron, Ohio; for the purpose of preserving it as an estuarine sanctuary, prohibiting commercial exploitation of said area and to perpetuate it in its ' own natural enviorment.

If this is correct, we readily endorse the idea and implore you to continue any and all action required to achieve this final goal.

Sincerely,

Robert L. Winters

Mr. Robert L. Winters

Dorothy J. Winters

Mrs Dorothy J. Winters

124 McKinley St.
Huron, Ohio 44839

cc: Mrs Ethel Swanbeck
[redacted]
Mr. Charles A. Mosher
Dr. Robert Teater
Governor, James Rhodes

CC 2 M
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INFO - TH
T & O

APPENDIX 2

Letter from Thomas H. Smith

State Historical Preservation

Officer

January 25, 1977

Dr. Robert Kifer
Office of Coastal Zone Management
U.S. Department of Commerce
National Oceanic and Atmospheric Administration
NOAA-CZ-6 Page Building Nr. 6
30300 Whitehaven Street
Washington, D.C. 20235

Re: Application for a national estuarine sanctuary at Old Woman Creek by Ohio Department of Natural Resources

Dear Dr. Kifer:

Mr. Thomas L. Vogel, Shoreland Management Unit, Ohio Department of Natural Resources (ODNR), has asked that the Ohio Historical Society review the above application and forward any comments on historic or archaeological sites to you. The application prepared by ODNR does not address cultural resources and yet, as you are aware, it is the Federal Agency's responsibility to comply with the National Historic Preservation Act of 1966 (P.L. 89-665), the National Environmental Policy Act of 1969 (P.L. 91-190) and the Executive Order on the Protection and Enhancement of the Cultural Environment, 1971 (E.O. 11593).

Although the Old Woman Creek watershed area or the proposed estuarine santuary have never been systematically surveyed for either history-architecture properties or archaeological sites there have been some preliminary surveys conducted in conjuction with the Erie Nuclear Plant and the relocation of U.S. Route 2. Three sites were located within the proposed right-of-way of S.R. 2 at the southern border of the proposed estuary. Two of these sites were excavated during 1976 and the other one will be excavated this year under contract with ODOT. Enclosed for your information are excerpts and maps from the Envrionmental Report for the Erie Nuclear Plant.

As you can see the Old Woman Creek watershed can be considered archaeologically sensitive, and although we have no sites recorded within the proposed estuary, there have been sites reported verbally. Protection and preservation of archaeological sites is compatible with park land and natural area development. A cultural resource management plan should be incorporated

Ohio Historic Preservation Office
Ohio Historical Center I-71 & 17th Avenue Columbus, Ohio 43211 (614) 466-8727

into the overall plan for sanctuary research and activity development. Research activities could relate specifically to archaeology by studying site locations within the watershed and formulating a prehistoric land use pattern which could then be used as a predictive model for other fresh-water estuaries throughout the Great Lakes. At the least, any construction within the proposed estuarine sanctuary should be proceeded by survey to locate and identify the cultural resources.

Thank you for the opportunity to comment on the application. Should you have additional questions or require further coordination with our staff, please contact Bert Drennen, archaeologist, at (614) 466-5347.

Sincerely yours,

Thomas H. Smith
State Historic Preservation Officer
Director, Ohio Historical Society

encl.

Xc: Thomas L. Vogel, ODNR
Charles Pratt, OHS
Jordan Tannenbaum, ACHP

THS:dk

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OLDWOMAN CREEK