Subject: Public Comment — Canopy Removal and Water-Quality Effects

Dear Ohio EPA:

I ask Ohio EPA to carefully evaluate the water-quality consequences of removing substantial existing mature tree canopy as part of NEORSD's proposed construction project.

Mature trees are not simply landscaping. Existing canopy shades waterways, intercepts rainfall, stabilizes soils, slows runoff, provides habitat, and helps regulate temperature.

Removal of riparian and nearby mature canopy can increase direct solar exposure to streams and wetlands. Increased water temperature can reduce dissolved oxygen and alter habitat conditions for aquatic organisms.

Canopy loss and construction disturbance can also contribute to:

- erosion;
- sedimentation;
- increased stormwater runoff;
- soil compaction;
- invasive-species establishment;
- habitat fragmentation;
- and loss of stabilizing root networks.

NEORSD proposes extensive replacement planting, but newly planted trees cannot immediately provide the ecological and water-quality functions of mature canopy.

I ask Ohio EPA to determine:

- how much existing mature canopy will be removed;

- how canopy loss was incorporated into water-temperature and water-quality analysis;
- whether dissolved-oxygen effects were evaluated;
- whether sediment and erosion consequences were modeled;
- how long replacement vegetation is expected to take before providing comparable shading and stabilization functions;
- and whether permit conditions are necessary to protect water quality during that transition.

Claims of improved future stream conditions should account for the consequences of removing the mature vegetation that performs important ecological functions today.

Please evaluate those tradeoffs before certification.

Sincerely,

[Name][Address / City][Optional personal observation about existing canopy, stream conditions, or wildlife]