

Subject: Public Comment — Mitigation and Predicted Future Conditions

Dear Ohio EPA:

I ask Ohio EPA to distinguish carefully between existing environmental conditions and the ecological benefits NEORSD predicts will occur after construction.

Project materials describe future wetlands, plantings, floodplain functions, and other anticipated ecological outcomes.

Those predictions may ultimately prove accurate. But predicted future benefits are not the same thing as existing ecological functions, and they should not be treated as certain without adequate support.

Please evaluate:

- what existing resources and functions would be lost or disturbed;
- which proposed benefits are certain and which depend on successful establishment over time;
- what performance standards will apply;
- how long monitoring will continue;
- what constitutes successful mitigation;
- what happens if wetlands, vegetation, habitat, or other predicted functions fail to develop as expected;
- who is responsible for corrective action;
- and whether enforceable contingencies exist if the proposed mitigation underperforms.

Replacement ecology takes time.

A wetland expected to develop later is not automatically equivalent to a functioning wetland today. A newly planted tree

is not equivalent to mature canopy. A constructed channel does not necessarily provide its predicted ecological functions immediately.

Please require Ohio EPA's decision to distinguish clearly between present conditions, project impacts, mitigation commitments, and hoped-for future outcomes.

Thank you.

Sincerely,

[Name][Address / City][Optional personal observation]