

Subject: Public Comment — Wetlands and ORAM Review

Dear Ohio EPA:

I am submitting this comment because wetlands are an important part of Ohio EPA's Section 401 review of the proposed Horseshoe Park construction project.

The public materials appear to include both existing wetlands and areas described as places where wetland conditions are expected to develop after construction. Those are not the same thing.

One project map, for example, identifies an "Expected Passive Wetland Restoration Area." The word "expected" describes a predicted future condition. It should not be treated as interchangeable with verified wetland acreage that exists today.

Before certification, I ask Ohio EPA to clearly identify:

- the acreage and location of wetlands that presently exist;
- when each wetland was delineated;
- the physical condition of the site when the delineation occurred;
- which existing wetlands would be preserved, disturbed, filled, or otherwise affected;
- which wetland areas would be created or are predicted to develop later;
- the ORAM score and category assigned to each existing wetland;
- when the ORAM assessments were performed;
- and whether Ohio EPA independently verified the applicant's wetland delineations and ORAM conclusions.

If the physical landscape changed materially after a wetland or ORAM assessment was completed, Ohio EPA should determine whether the assessment remains representative of present conditions.

Predicted future wetlands may have value, but predictions should not substitute without explanation for existing wetland functions being affected today.

Please require a clear accounting of what exists, what will be lost or disturbed, what is proposed to replace it, and how certain those replacement functions actually are before certification is issued.

Thank you.

Sincerely,

[Name][Address / City][Optional information about wetlands or site conditions you have observed]