



EAST MAIN STREET BUS RAPID TRANSIT SECTION 4(F) MEMORANDUM

CENTRAL OHIO TRANSIT AUTHORITY

REVISION #4

September 2026

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1	September 22, 2025	Kimley-Horn
2	March 27, 2026	Kimley-Horn
3	May 28, 2026	Kimley-Horn
4	August 24, 2026	Kimley-Horn

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ACRONYM LIST:

ADA: Americans with Disabilities Act

APE: Area of Potential Effect

BMP: Best Management Practices

BRT: Bus Rapid Transit

CFR: Code of Federal Regulations

COTA: Central Ohio Transit Authority

FHWA: Federal Highway Administration

FTA: Federal Transit Administration

MOA: Memorandum of Agreement

NHPA: National Historic Preservation Act

NRHP: National Register of Historic Places

OHI: Ohio Historic Inventory

OWJ: Official With Jurisdiction

ROW: Right-of-way

SHPO: State Historic Preservation Office

SOP: Standard Operating Procedures

STOPS: Simplified Trips-On-Project Software

TOD: Transit-Oriented Development

TSP: Transit Signal Priority

URA: Uniform Relocation Assistance and Real Property Acquisition Act

USC: United States Code

USDOT: US Department of Transportation

1. INTRODUCTION

1.1. PURPOSE OF THE SECTION 4(F) EVALUATION

The Central Ohio Transit Authority (COTA) proposes to construct the East Main Bus Rapid Transit (BRT) project, a proposed 13-mile BRT corridor that travels along East Main Street from Downtown Columbus through Reynoldsburg in Franklin County and Licking County, Ohio. See **Figure 2-1** and **Figure 2-2**. COTA will be seeking federal funding from the Federal Transit Administration (FTA) for the project.

This report provides documentation necessary to support determinations as required by 49 United States Code § 303 (originally enacted as Section 4(f) of the Department of Transportation Act of 1966), as implemented by 23 Code of Federal Regulations (CFR) Part 774 (collectively referred to as “Section 4(f)”). Section 4(f) prohibits FTA from approving the use (as defined in 23 CFR Section 774.17) of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance unless FTA determines that there is no feasible and prudent alternative to the use of land and all possible planning to minimize harm resulting from the use has been accomplished.

This report has been prepared in accordance with 23 CFR Part 774, FTA’s Standard Operating Procedure No. 18: Section 4(f) Evaluations¹, and the Federal Highway Administration Section 4(f) Policy Paper².

1.2. LAWS, REGULATIONS, AND GUIDELINES

Section 4(f) of the US Department of Transportation Act of 1966 is a federal law that protects publicly owned parks, recreation areas, and wildlife and/or waterfowl refuges, and publicly or privately owned significant historic sites.

This analysis complies with the requirements of 23 CFR Part 774. The purpose of 23 CFR Part 774 is to implement 23 United States Code (USC) 138 and 49 USC 303, which were originally enacted as Section 4(f) of the Department of Transportation Act of 1966 and are commonly referred to as “Section 4(f).” The regulation states that US Department of Transportation (USDOT) agencies, including the FTA and the Federal Highway Administration (FHWA), may not approve the use of:

... a significant publicly-owned park, recreation area or wildlife and waterfowl refuge or any significant historic site, unless there is no feasible and prudent alternative to the use of land from the property and the action includes all possible planning to minimize harm to the property resulting from the use.

This analysis was also conducted in accordance with the following FTA and FHWA guidance on the Section 4(f) process:

¹ Federal Transit Administration. 2016. *Standard Operating Procedures No. 18: Section 4(f) Evaluations*. <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/SOP%2018.pdf>.

² Federal Highway Administration. 2012. *Section 4(f) Policy Paper*. <https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx>.

- ▶ Standard Operating Procedures (SOP) No. 18: Section 4(f) Evaluations³
- ▶ Section 4(f) Policy Paper⁴

1.3. SECTION 4(F) RESOURCES

Section 4(f) requires consideration of:

- ▶ Parks and recreational areas of national, state, or local significance that are both publicly owned and open to the public.
- ▶ Publicly owned wildlife and waterfowl refuges of national, state, or local significance that open to the public to the extent that public access does not interfere with the primary purpose of the refuge.
- ▶ Historic sites of national, state, or local significance in public or private ownership regardless of whether they are open to the public.

Per the *Section 4(f) Policy Paper*, the term “significant” under Section 4(f) means that in comparing the availability and function of the park, recreation area, or wildlife and waterfowl refuge with the park, recreation, or refuge objectives of the agency, community, or authority, the property in question plays an important role in meeting those objectives. A determination of significance is made in coordination with the official with jurisdiction. In absence of a determination by the official with jurisdiction, a park, recreational area, or wildlife and waterfowl refuge is presumed to be significant.

Regarding historic sites, the term “significant” under Section 4(f) means that a property is listed on or has been determined eligible for listing on the National Register of Historic Places (NRHP).

1.4. DEFINITION OF SECTION 4(F) USE

A Section 4(f) use is generally defined as a transportation activity that permanently or temporarily acquires land from a Section 4(f) resource or that substantially impairs the important activities, features, or attributes that qualify the property as a Section 4(f) resource. There are three types of uses:

- ▶ **Permanent incorporation:** A permanent incorporation occurs when land from a Section 4(f) property is acquired or incorporated, in whole or in part, as part of a transportation facility. This includes acquiring a property interest that allows permanent access onto the property, such as a permanent easement for maintenance or other transportation-related purposes.
- ▶ **Temporary occupancy:** A temporary occupancy results when Section 4(f) property, in whole or in part, is required for project construction-related activities and is substantially impaired. Under 23 CFR 774.13, a temporary occupancy of a resource is not considered a use under Section 4(f) if all the conditions listed below are met:
 - The duration of use would be temporary (i.e., less than the time needed for construction of the project), and there would be no change in ownership of land.

³ Federal Transit Administration. 2016. *Standard Operating Procedures No. 18: Section 4(f) Evaluations*. <https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/SOP%2018.pdf>.

⁴ Federal Highway Administration. 2012. *Section 4(f) Policy Paper*. <https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx>.

- The scope of work would be minor (i.e., both the nature and magnitude of the changes to the Section 4(f) resource would be minimal).
 - There would be no anticipated permanent adverse physical impacts, nor would there be interference with the protected activities, features or attributes of the resource, on either a temporary or permanent basis.
 - The land being used would be fully restored to a condition that is at least as good as that which existed before the project.
 - There is a documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.
- **Constructive use:** A constructive use of Section 4(f) property occurs when there is no physical use of the Section 4(f) property such as permanent incorporation of land or temporary occupancy, but the proximity of the project results in impacts (e.g., noise, vibration, visual impacts, property access) that substantially impair the activities, features, or attributes that qualify the property for protection under Section 4(f).

1.5. APPROVAL OF SECTION 4(F) USES

Before approving the use of a Section 4(f) resource, as the lead federal agency, the FTA must either:

- Determine that the project would have a *de minimis* impact on the property (as defined in 23 CFR 774.17), or
- Undertake an individual Section 4(f) evaluation to determine that there is no feasible and prudent avoidance alternative to the use and that all measures to minimize harm to the resource have been undertaken.

1.5.1. De Minimis Determination

For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* impact is one that, after taking into account avoidance, minimization, mitigation, and enhancement measures, would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f). The official(s) with jurisdiction over the property must be informed of the intent to make a *de minimis* determination, and an opportunity for public review and comment must be provided. After considering any comments received from the public, if the official(s) with jurisdiction concur in writing that the project would not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection, then the FTA may finalize the *de minimis* impact determination.

For historic sites, a *de minimis* impact means that the FTA has determined, in accordance with Section 106 of the National Historic Preservation Act of 1966 (36 CFR Part 800) (NHPA), that no historic resource is affected by the project, or the project would have “no adverse effect” on the historic resource. Before making a *de minimis* finding, FTA must send a written notice to the State Historic Preservation Office (SHPO). If the SHPO concurs or does not object, FTA may proceed with its finding.

When FTA has made a *de minimis* determination, the project is not required to analyze avoidance alternatives for that Section 4(f) resource.

1.5.2. Avoidance Alternatives and Least Overall Harm Analysis

If a project's Section 4(f) use is greater than *de minimis*, FTA is required to consider whether there are feasible and prudent alternatives that would avoid the use. As defined in 23 CFR 774.17, an alternative is not feasible if it cannot be built as a matter of sound engineering judgment. An alternative is not prudent if:

- ▶ It would compromise the project to a degree that is unreasonable to proceed with the project in light of its stated purpose and need;
- ▶ It results in unacceptable safety or operational problems;
- ▶ After reasonable mitigation, it still causes
 - Severe social, economic, or environmental impacts;
 - Severe disruption to established communities;
 - Severe disproportionate impacts to minority or low-income populations; or
 - Severe impacts to environmental resources protected under other federal statutes;
- ▶ It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
- ▶ It causes other unique problems or unusual factors; or
- ▶ It involves multiple factors listed above, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

If the FTA finds that an alternative causes a Section 4(f) use and there is an avoidance alternative that is feasible and prudent, then the alternative that causes a Section 4(f) use must be removed from consideration.

If there are no feasible and prudent alternatives that can avoid all Section 4(f) resources, Section 4(f) requires the consideration and documentation of all possible planning to minimize harm to the Section 4(f) resource. As defined in 23 CFR 774.17, this means that all reasonable measures identified in the Section 4(f) evaluation to minimize harm or mitigate for adverse effects must be included in the project.

If no feasible and prudent avoidance alternatives avoid all Section 4(f) resources, FTA must choose the alternative that will have the least overall harm in light of the statute's preservation purpose. This is called the Least Overall Harm Analysis.

2. PROPOSED PROJECT

2.1. PROJECT DESCRIPTION

The East Main Street BRT corridor is a part of Central Ohio's regional growth and mobility initiative called LinkUS. LinkUS aims to make historic investments in transit, sidewalks, bikeways, trails, and roadway improvements that would encourage more walkable connected communities and increase opportunity for all. By 2050, LinkUS aims to integrate five new rapid transit corridors, including the East Main BRT Corridor, see **Figure 2-1**.

The East Main BRT project is a proposed 13-mile BRT corridor that travels along East Main Street from Downtown Columbus through Reynoldsburg in Franklin County and Licking County, Ohio. It is expected to operate 8 miles on a dedicated guideway with the remainder in mixed traffic lanes and would be served by 17 stations, see **Figure 2-2**.

2.1.1. Operations

The East Main BRT would use buses fueled by compressed natural gas (CNG). BRT would operate from 5 a.m. to midnight, seven days per week. Frequencies would vary from 10-minute headways in peak daytime weekday and Saturday hours to 15- to 20-minute headways for early morning, late night, and Sunday hours.

2.1.2. Stations and Micro-Mobility Hubs

The East Main BRT would include 17 BRT stations. There are three station typologies proposed along the route: median, side, and end-of-line stations. Most stations proposed within the corridor are median stations, with the exception of a side station at Taylor Road in Reynoldsburg. The proposed eastern end-of-line station is near the Eastwood development, approximately 0.5 mile east of Taylor Road Station in Reynoldsburg. Station platforms would be 60 feet long and 12 to 14 feet wide. All proposed stations feature accessible entrances, ticket vending, fare validator, bike rack, transit beacon with lighting and digital wayfinding, trash receptacle, wind screen, community wall art, security system, real-time bus arrival display, snow-melt pavement, and landscaping. The station platforms would be raised to accommodate level boarding.

Additionally, micro-mobility hubs are proposed near several stations in the corridor. Micro-mobility hubs generally include concrete pavement and bike racks for parking 12 bikes and additional space for future non-specific bike/scooter docking. In Columbus, micro-mobility hubs are proposed near South 18th Street, South Champion Avenue, Kelton Avenue, and Alum Creek Drive stations. In Bexley, a micro-mobility hub would be located at Pleasant Ridge Station. In Whitehall, hubs are proposed near Maplewood and Fairway Boulevard Stations. Reynoldsburg locations include Brice Road and Haft Drive Stations.

2.1.3. Infrastructure

The project would require roadwork within the East Main Street corridor, consisting of utility relocations, full roadway reconstruction and widening in vicinity of stations, intersection improvements including ADA-accessible pedestrian facilities, street lighting, traffic signals and communications systems infrastructure, and landscaping. In areas outside the full roadway reconstruction limits, a mill and overlay of the existing pavement would occur along with the addition of a raised center median and restriping of traffic lanes.

In Downtown Columbus, dedicated BRT lanes are proposed on the east side of 3rd Street from Spring Street to East Main Street. Along East Main Street from 3rd Street to Washington Avenue, BRT would run in a dedicated center-running bus lane. From Washington Avenue to Parsons Avenue, the BRT would switch to operating in mixed traffic. The East Main BRT would operate in a dedicated center-running bus lane from just east of Parsons Avenue to the City of Bexley. Along East Main Street in the City of Bexley, the BRT would operate in mixed traffic. East of the Bexley municipal boundary, the BRT would operate in a dedicated, center-running bus lane and would switch to operating in mixed traffic along East Main Street between the eastern boundary of the City of Whitehall and the western boundary of the City of Reynoldsburg. Between the Brice Road and Haft Drive Stations, the BRT would operate in a dedicated center-running bus lane, and east of the Haft Drive station, the BRT route would operate in mixed traffic.

Generally, roadway improvements would be accommodated within existing right-of-way, but some widening would be required particularly at stations that would require some right-of-way acquisition. Placement of any necessary stormwater infrastructure is still being refined, but potential parcels for stormwater best management practices have been identified and included as part of the project.

Note that proposed property acquisitions for the project are preliminary and subject to change as the project design advances and coordination with affected property owners occurs. The need for property acquisitions to accommodate the project would be avoided or minimized to the extent reasonably feasible.

Right-of-way acquisition can include:

- ▶ Permanent, partial acquisition of land – COTA would permanently acquire a portion of a property to provide adequate right-of-way (ROW) for the project on a permanent basis, either through permanent ROW acquisition or permanent easement.
- ▶ Temporary, partial acquisition of land – COTA would acquire a portion of a property to provide access and activities during construction. Often this is reflected as a temporary easement. The temporarily acquired land would be restored and returned to the property owner at the end of construction.

No new traffic signals are proposed as part of East Main BRT. Existing signals would be modified to accommodate Transit Signal Priority (TSP) for BRT.

2.2. PURPOSE AND NEED

The purpose of the project is to improve connectivity in and beyond the Corridor, support and catalyze appropriate types of new development and redevelopment projects, and improve access to opportunities for housing, goods and services, and employment.

The five project needs identified in the *East-West Corridor High Capacity Transit Corridor Plan: Purpose and Need*⁵ and utilized for the development of the project are as follows:

- ▶ Provide high capacity transit that carries more people with greater reliability, more frequent service, and fewer stops, resulting in shorter travel times.
- ▶ Develop an implementable transit system plan that connects and integrates existing transit and high capacity transit corridors.
- ▶ Provide increased transit options for Central Ohio residents who do not use auto transportation and encourage increased use of transit to further regional sustainability needs.
- ▶ Improve transit access to employment opportunities and core services for corridor communities.
- ▶ Spur focused and compact infill and redevelopment along the corridor to sustainably accommodate expected growth.

The East Main Street BRT Corridor is also a part of a greater growth and mobility vision for Central Ohio called LinkUS. It is one of five new rapid transit corridors identified for implementation by 2050, as shown on **Figure 2-1**. East Main BRT Corridor is an integral part of the system, serving the eastern part of the region and integrating with the planned West Broad and Northwest BRT corridors to provide a comprehensive BRT network spanning east-west and to the northwest.

⁵ COTA. 2021. *East-West Corridor High Capacity Transit Corridor Plan: Purpose and Need*. https://linkuscolumbus.com/wp-content/uploads/2021/04/COTA_East-West-HCT-Purpose-and-Need_Final.pdf

Figure 1: LinkUS Corridor Projects



SOURCE: LinkUS May 2025 Progress Update

Figure 2: East Main BRT Project



3. IDENTIFICATION OF SECTION 4(F) PROPERTIES

COTA reviewed existing mapping, conducted field investigations/site reconnaissance, searched property records, and consulted with officials with jurisdiction to identify the properties protected by Section 4(f) that may be impacted by the project.

3.1. PARKS, RECREATIONAL AREAS, AND WILDLIFE AND WATERFOWL REFUGES

COTA identified the parks and recreation areas subject to Section 4(f) that are located within or adjacent to the proposed BRT corridor. These are identified in **Table 3-1** and in **Figure 3** and **Figure 4**. For parks, recreation areas, and wildlife and waterfowl refuges to qualify for protection under Section 4(f), each of the following criteria must be true:

- ▶ The resource must be publicly owned
- ▶ The resource must be open to the public
- ▶ The major purpose of the resource must be park, recreation, or refuge activities
- ▶ The resource must be significant in meeting park, recreation, or refuge objectives

For these reasons, each resource is protected by Section 4(f). No wildlife or waterfowl refuges are present in the study area.

Table 3-1: Park and Recreation Resources Within the Potential Area of Disturbance

Resource Name/FRA Number	Official with Jurisdiction	Location	Closest Station	Project Impact/ Section 4(f) Use
Blackburn Park	City of Columbus Recreation and Parks	263 Carpenter Street	East 18th Street	Yes/de minimis
Pump House Park	City of Columbus Recreation and Parks	2081 East Main Street	Nelson Road	Yes/de minimis
Alum Creek Trail	City of Columbus Recreation and Parks	Crosses East Main Street, east of Alum Creek Drive	Nelson Road	Yes/No use (temporary occupancy)
Big Walnut Park	City of Columbus Recreation and Parks	5000 East Livingston Avenue	Fairway Boulevard	No/No use

Figure 3: Park and Recreation Resources Within the Potential Area of Disturbance - Pg 1

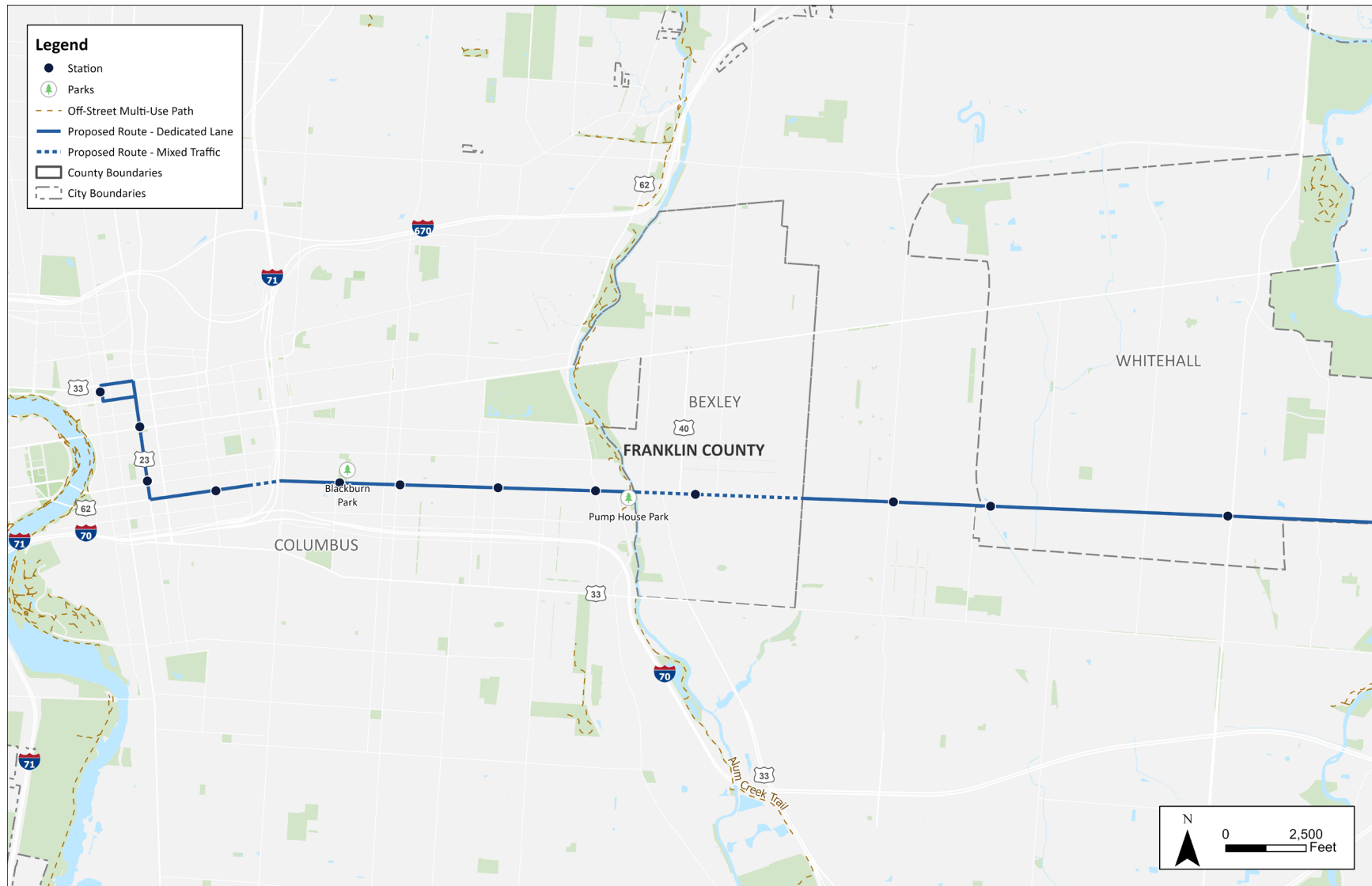
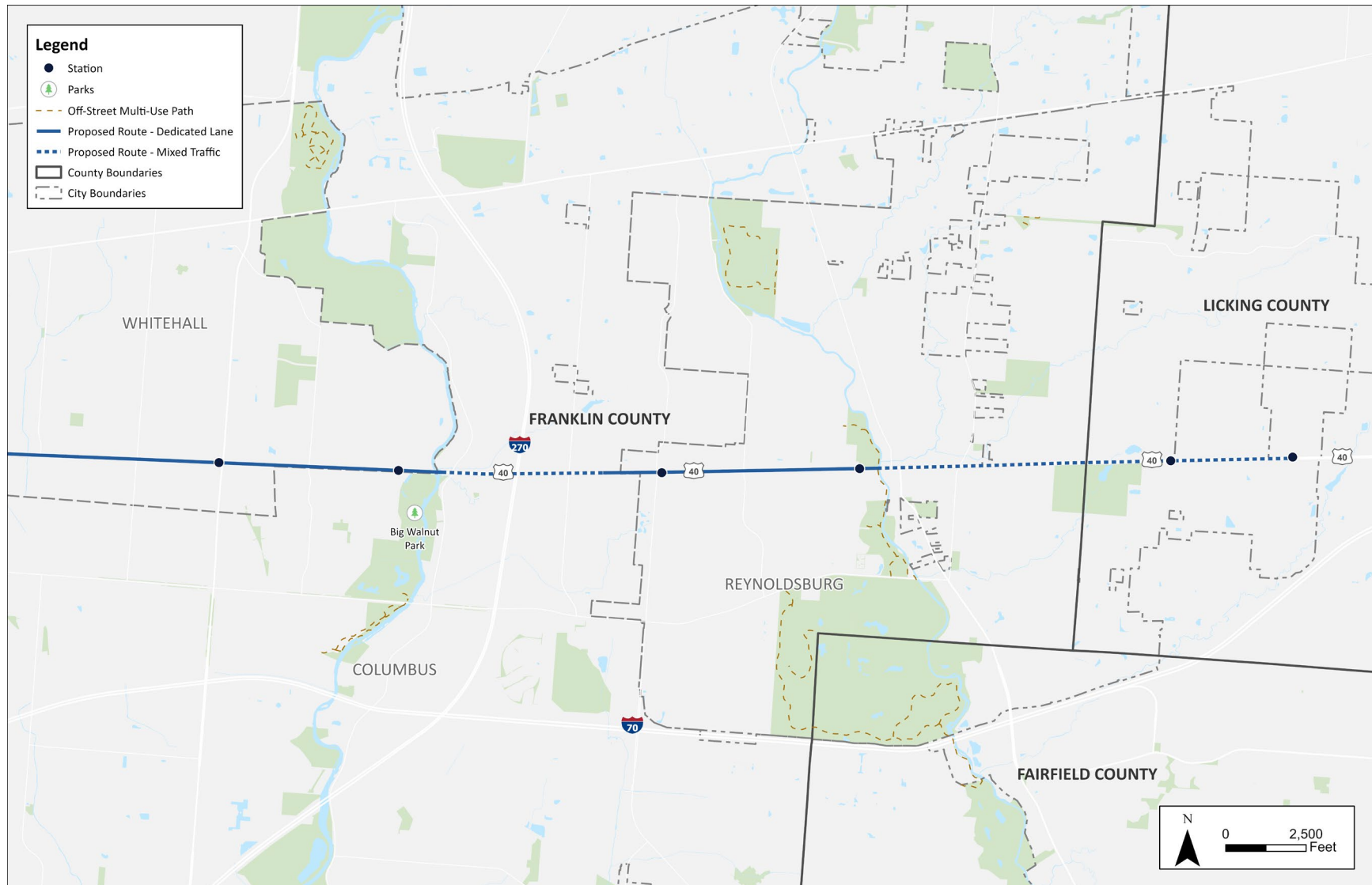


Figure 4: Park and Recreation Resources Within the Potential Area of Disturbance - Pg 2



3.2. HISTORIC PROPERTIES

As defined by Section 4(f), historic sites are properties that are listed on the National Register of Historic Places (NRHP) or have been determined to be eligible for listing on the NRHP. Historic sites were identified as part of the FTA's consultation under Section 106 of the NHPA (hereinafter referred to as Section 106). **Table 3-2** lists the historic sites that are within the area of potential effect (APE) that was defined for the project under Section 106. Historic site locations are shown in **Figure 5** and **Figure 6**.

Table 3-2: Historic Sites within the APE

Resource Name	FRA Number	Location	Related Station/ Work Area	NRHP Status	Project Impact/ Section 4(f) Use
Trinity Episcopal Church	FRA0008618	125 East Broad Street	South 3rd Street & Broad Street	Listed (NRHP 76001427)	Yes/No use (temporary occupancy)
Ohio Statehouse	FRA0065018	1 Capitol Square	South 3rd Street & Broad Street	Listed (NRHP 72001011)	Yes/No use (temporary occupancy)
Former Greyhound Bus Terminal	FRA1039418	111 East Town Street	South 3rd Street & East Rich Street Station & Greyhound demolition area	Eligible	No/No use
Yerke Mortgage Company	FRA0693918	145 East Rich Street	Greyhound demolition area	Eligible	No/No use
Neighborhood Rehab Center (McClure-Nesbitt Motor Co.)	FRA0225319	1505 East Main Street	Kelton Avenue	Eligible	No/No use
National Road Mile Marker 254	FRA0862720	2314 East Main Street	Pleasant Ridge Avenue	Eligible	No/No use
State of Ohio Department of Agriculture	N/A	8995 East Main Street	Eastwood Park & Ride	Eligible	No/No use

Figure 5: Historic Sites within the APE - Pg 1

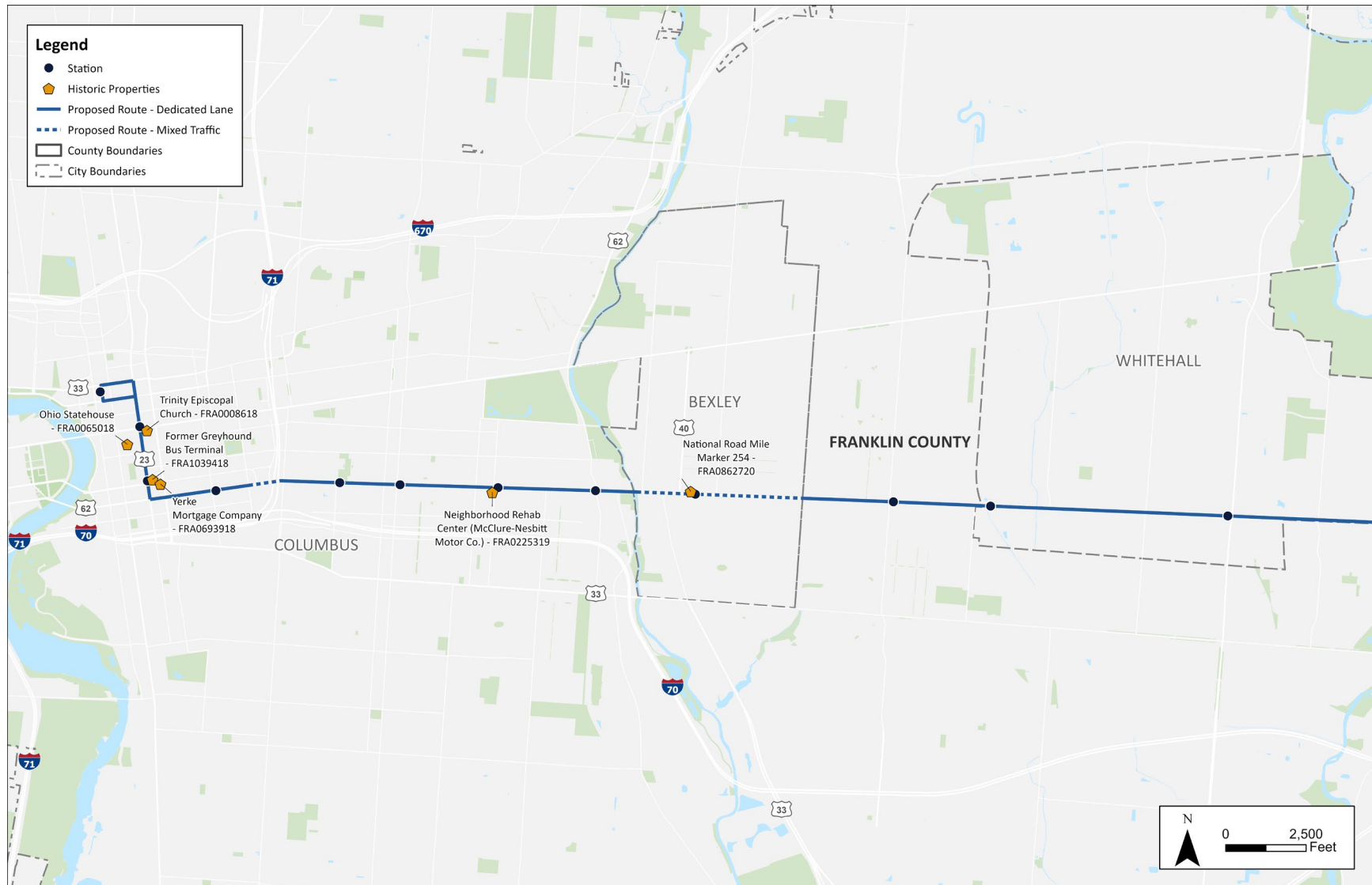
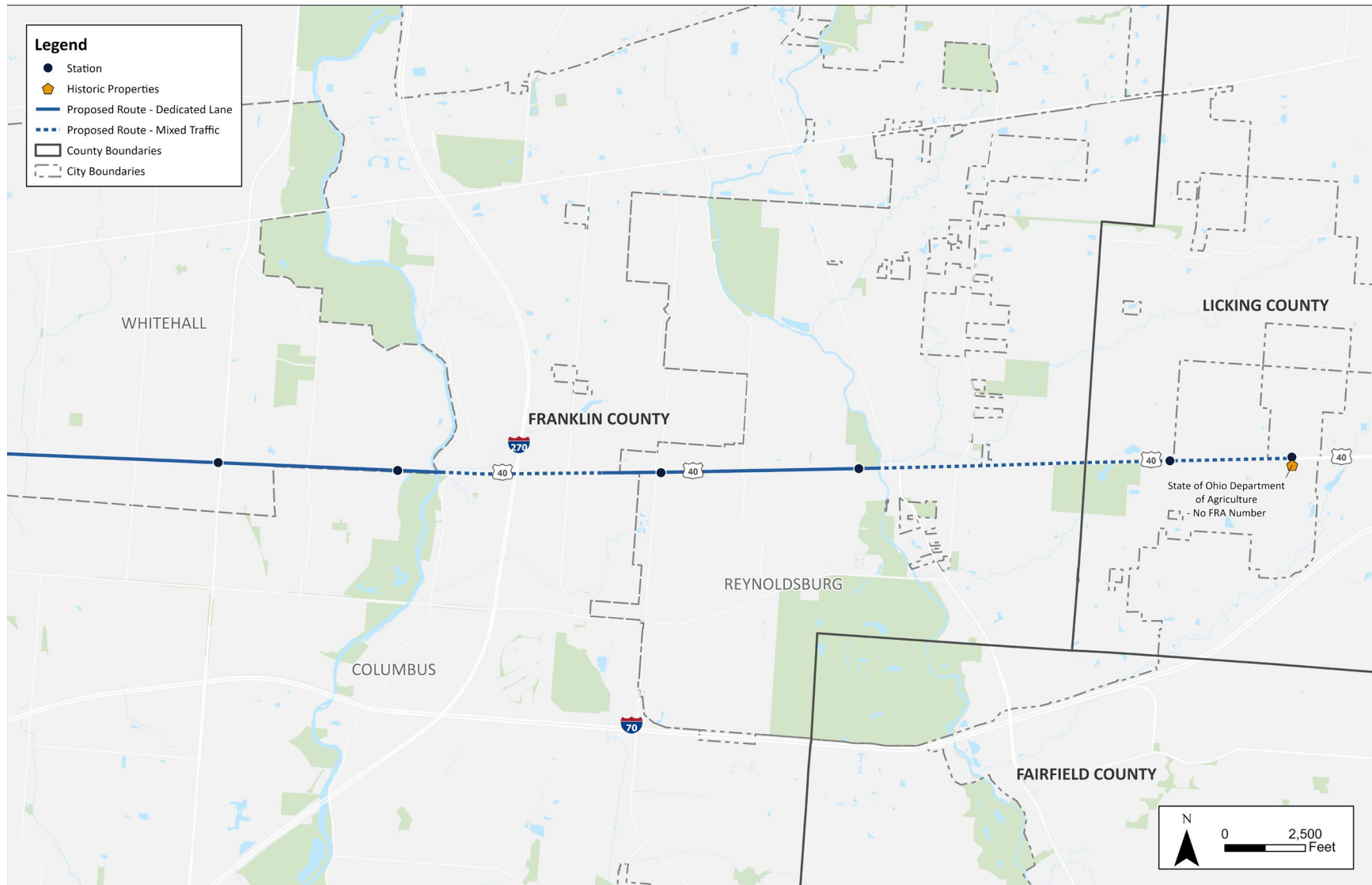


Figure 6: Historic Sites within the APE - Pg 2



4. ASSESSMENT OF USE

4.1. PARKS

This section assesses the potential for the project to impact park and recreational properties that are protected by Section 4(f).

Big Walnut Park

Big Walnut Park is a 136-acre community park in the Mid-East community of Columbus. The OWJ is the City of Columbus Recreation and Parks. The activities, features, or attributes that make Big Walnut Park significant include a community center, dog park, access to the Greenway Trail, baseball diamonds, basketball courts, pickleball overlays, and tennis courts. The project would not impact Big Walnut Park; therefore, there would be no Section 4(f) use.

Blackburn Park

Blackburn Park is a 5.3-acre park in the Near East neighborhood of Columbus, northeast of the intersection of E Main Street and S 18th Street. The OWJ is City of Columbus Recreation and Parks. The activities, features, or attributes that make Pump House Park significant under Section 4(f) include basketball courts, a futsal court, tennis courts, and a “sprayground” (a large outdoor water-themed playground). Blackburn Community Center is also located in the northeast corner of the park property.

The project would require approximately 0.04 acres of permanent easement and acquisition and approximately 0.03 acres of temporary easement within the park property. This would occur adjacent to the East Main Street ROW. The permanent acquisition is needed to widen the roadway to include a dedicated left turn lane and wider sidewalk. The impact also includes a mobility hub that would serve the median South 18th Street station. The Station would serve trips from the Nationwide Children’s Hospital and businesses at the East Main Street and South 18th Street intersection; locating the station as close as possible to these destinations is critical to the station’s use. The temporary easement is required to provide access for equipment and workers during construction. The areas of proposed permanent and temporary acquisition consist of existing grass lawn area with isolated trees. Impacts are shown on **Figure 7**. Removal of 6 to 8 trees would be required. No change in access to Blackburn Park would occur during construction or operation of the project. The areas of the park that would be affected by construction activities would be restored to existing conditions or better, and restoration would be developed and implemented in consultation with the City of Columbus Recreation and Parks.

Based on this information, FTA has made a preliminary determination that the use of this park constitutes a *de minimis* impact, as the project would not adversely affect the features, attributes, or activities that qualify Blackburn Park for protection under Section 4(f).

Figure 7: Impacts to Blackburn Park



Pump House Park

Pump House Park is a 4-acre neighborhood open space in the Near East neighborhood of Columbus, southeast of the intersection of E Main Street and Alum Creek Drive. The OWJ is City of Columbus Recreation and Parks. The activities, features, or attributes that make Pump House Park significant under Section 4(f) include the open space that is available for public use. The project would require approximately 0.04 acres of permanent acquisition and 339 square feet of temporary easement within park property, adjacent to the south side of East Main Street. The acquisition is to replace existing sidewalk for the installation of traffic conduit and to install a mobility hub to serve the nearby station west of Alum Creek Drive. The temporary easement is required to provide access for equipment and workers during construction. The areas of proposed permanent and temporary acquisition consist of existing boulevard area and tree removal would not be required. The proposed mobility hub would be screened from the park's open space. Impacts are shown below on **Figure 8**. The areas of the park that would be affected by construction activities would be restored to existing conditions or better, and restoration would be developed and implemented in consultation with the City of Columbus Recreation and Parks. No change in access to Pump House Park would occur during construction or operation of the project.

Based on this information, FTA has made a preliminary determination that the use of this park constitutes a *de minimis* impact, as the project would not adversely affect the features, attributes, or activities that qualify Pump House Park for protection under Section 4(f).

Alum Creek Trail

The Alum Creek Trail is a 24.5-mile regional trail that travels along the Alum Creek in Central Ohio and is part of the Central Ohio Greenway system. The alignment of Alum Creek Trail runs through Pump House Park as shown in **Figure 8**. The official with jurisdiction (OWJ) is City of Columbus Recreation and Parks. Sections of the Alum Creek Trail are designated as part of the Ohio to Erie Trail and U.S. Bicycle Route 50.

The project needs to replace sidewalk running along the south side of E Main Street at the north edge of Pump House Park. Since the Alum Creek Trail travels along the sidewalk, the project would impact the Alum Creek Trail during construction. The Alum Creek Trail would be temporarily re-routed along the east side of Alum Creek Drive during construction. However, the sidewalk would be replaced in the same location and there would be no anticipated permanent adverse physical impacts. The project would require a temporary occupancy which does not constitute a Section 4(f) use.

Figure 8: Impacts to Pump House Park



4.1.1. Potential for Constructive Use of Parks

The project was evaluated for the potential to have a constructive use of park and recreational properties. In accordance with the requirements of Section 4(f), only those park or recreational properties that have no potential for a permanent or temporary incorporation of land were considered. As previously described, a constructive use occurs when the proximity impacts of a project are significant enough to substantially diminish the activities, features, or attributes of a park or recreational property. Proximity effects could include noise, vibration, visual change, or restriction of access.

Noise and Vibration

Ambient noise levels at both parks are dominated by existing motor vehicle traffic noise along East Main Street. Noise and vibration levels for the project were analyzed, and noise and vibration from CNG-fueled BRT buses would be similar to other types of motor vehicles.⁶ No noise and vibration impacts are anticipated at Blackburn or Pump House parks. The project would not cause a constructive use due to operations noise or vibration.

Project construction activity has the potential to temporarily increase noise and vibration levels at both parks. Community noise is regulated by the City of Columbus noise ordinance “Code of Ordinances, Title 23 -General Offenses Code,” specifically, Chapter 2329, Article 11 - Community Noise. Although this ordinance limits noise from stationary activities, it also exempts all public works projects (Section D, Special Provisions [Exemptions]). Other noise ordinances (such as Ohio Revised Code Section 505.172 Noise Control) do not set any specific limits on temporary construction activities. Therefore, the default FTA guidelines are used for this project.

To mitigate potential noise and vibration impacts during construction, COTA will implement best management practices (BMPs) to minimize or control these effects to the extent practicable. Measures may include, but are not limited to, installing acoustical curtains or other temporary noise barriers on perimeter fencing at staging areas, using equipment enclosures, and substituting impulsive or impact equipment with quieter alternatives where feasible.

The contractor will be contractually obligated to apply the noise and vibration control measures specified by COTA in the project construction plans. These measures are designed to avoid or reduce, to the greatest extent feasible, temporary increases in noise and vibration levels beyond the project construction boundaries.

Visual Change

The land uses the project Corridor near Blackburn and Pump House parks are a mix of commercial, residential, and institutional properties. Views along the Corridor include surface parking lots, buildings abutting the sidewalk, single-family and multifamily residences, vacant lots, and transportation infrastructure, including bridges, overhead signals, and other utilities. The permanent visual change caused by the project along East Main Street at the parks would include BRT stations and vehicles operating on a median dedicated guideway in the roadway. These project visual elements would be

⁶ East Main Street Bus Rapid Transit Noise and Vibration Technical Report [in progress]

additive to the existing visual context of East Main Street; however, because the project would use the existing transportation corridor, the project would not substantially change the visual environment at the parks and would not cause substantial impairment of the aesthetic features or attributes of the parks. As a result, project operations would not cause a constructive use due to visual change at Blackburn or Pump House parks.

Project construction activity has the potential to temporarily cause visual impacts at the parks related to reconstruction of East Main Street, replacement of sidewalks, and equipment operations in the roadway ROW. However, because construction activity would be temporary in duration, visual impacts during project construction would not substantially impair the aesthetic features or attributes of the parks. For this reason, project construction would not cause a constructive use due to visual change at Blackburn or Pump House parks.

Restriction of Access

The project would not permanently restrict access to parks and recreational areas. Project operations would not cause a constructive use due to access to Blackburn or Pump House parks.

The primary access for Blackburn Park is from South 18th Street, and primary access for Pump House Park is further south on Alum Creek Drive. As project construction activity would not occur on these roadways, project construction would not cause a constructive use of Blackburn or Pump House parks due to restriction of access.

4.2. HISTORIC PROPERTIES

This section assesses the potential for the project to impact historic sites (properties) that are protected by Section 4(f). The archaeological survey for the project identified no specific archaeological sites within the APE that could be impacted by the project. Historic properties (above-ground structures) were identified and evaluated in the context of Section 106 of the NHPA.

Former Greyhound Bus Terminal

The former Greyhound Bus Terminal (FRA1039418) at 111 East Town Street, at northeast corner of the intersection of S 3rd Street and Rich Street within the project's APE, is eligible for listing on the NRHP under Criterion A, "associated with events that have made a significant contribution to the broad patterns of history," as a "downtown transportation hub that developed as part of the Market-Mohawk Urban Renewal planning for re-envisioning downtown Columbus."

The project would have no ROW/work easements in this location, and no building impacts would occur. FTA has determined that implementing the project will not result in Section 4(f) use because there will be no permanent or temporary use of this historic property.

Neighborhood Rehab Center / McClure-Nesbitt Motor Co.

The Neighborhood Rehab Center (historically McClure-Nesbitt Motor Co.) (FRA0225319) is located at 1505 East Main Street and within the southwestern quadrant of the Kelton Avenue Station APE. This resource was built c. 1925. It was inventoried on August 7, 1975 and recommended as NRHP eligible under Criterion C for its Art Deco architecture.

The project would have no ROW/work easements in this location, and no building impacts would occur. A Section 106 finding of No Adverse Effect has been made with respect to the project impacts at the Neighborhood Rehab Center/McClure -Nesbitt Motor Co. FTA has determined that implementing the project will not result in Section 4(f) use because there will be no permanent or temporary use of this historic property

National Road Mile Marker 254

National Road Mile Marker 254 (FRA0862720) is located at the southeast corner of the parcel containing the Christ Lutheran Church and is located beside the church's sign. This spot is just beyond the northwestern edge of the 150-foot APE buffer for the Pleasant Ridge Avenue Station, but as its parcel is within the APE, it was evaluated. This milestone is an early reinforced concrete monument type, built c. 1830 – 1860 and altered between c. 1930-1955. It was inventoried in April of 1998 and recommended eligible for the NRHP under Criterion A for its association with the historic National Road.

The project would have no ROW/work easements in this immediate location, and no physical impacts would occur to this object. FTA has determined that implementing the project will not result in Section 4(f) use because there will be no permanent or temporary use of this historic property.

State Department of Agriculture Laboratory

This state laboratory complex has not been recorded in the Ohio Historic Inventory (OHI), neither the individual buildings nor the complex as a whole, but it had previously been assessed for potential effects from the construction of a cellular communications tower in 2001 (DOEID829; SerNo 500083). That tower is located at 8550 East Main Street, approximately 0.5 miles west of the complex. During the review process, the SHPO indicated that the complex itself was not eligible for NRHP district status, because of "large-scale integrity issues related to new construction." That same letter dated February 5, 2002,⁷ indicated that four buildings within the complex exhibited individual eligibility under Criterion A and that one building also exhibited individual eligibility under Criterion C.

The project would require no acquisition of this property, and no physical impacts would occur. Any visual changes are not anticipated to adversely affect the property as its significance does not rely heavily on any vista from the facility outward. FTA has determined that implementing the project will not result in Section 4(f) use because there will be no permanent or temporary use of this historic property

⁷ For SHPO records and further information regarding property eligibility, refer to the Phase I History and Architecture Report

Trinity Episcopal Church

Trinity Episcopal Church (NRHP: 76001427/OHI: FRA0008618) is located at 125 East Broad Street. It was built between 1866 to 1869 by Gordon W. Lloyd and serves as a distinctive example of a mid-nineteenth century Gothic Revival church. This historic property was determined significant under Criterion C for its significant architecture overcoming Criteria Consideration A for religious resources. It was listed in NRHP in 1976.

The project would construct a median station south of the intersection of East Broad Street and North 3rd Street in downtown Columbus. The project would require 16 square feet of temporary easement from the Trinity Episcopal Church property. This impact is necessary to replace sidewalk and ADA infrastructure adjacent to the church property and tie into the existing church fence while providing adequate drainage from the property. Impacts are shown below on **Figure 9**.

A Section 106 finding of No Adverse Effect has been made with respect to the project impacts at the Trinity Episcopal Church. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply and that no Section 4(f) use of this property would result from project implementation. (see **Appendix A**).

Figure 9: Impacts to Trinity Episcopal Church



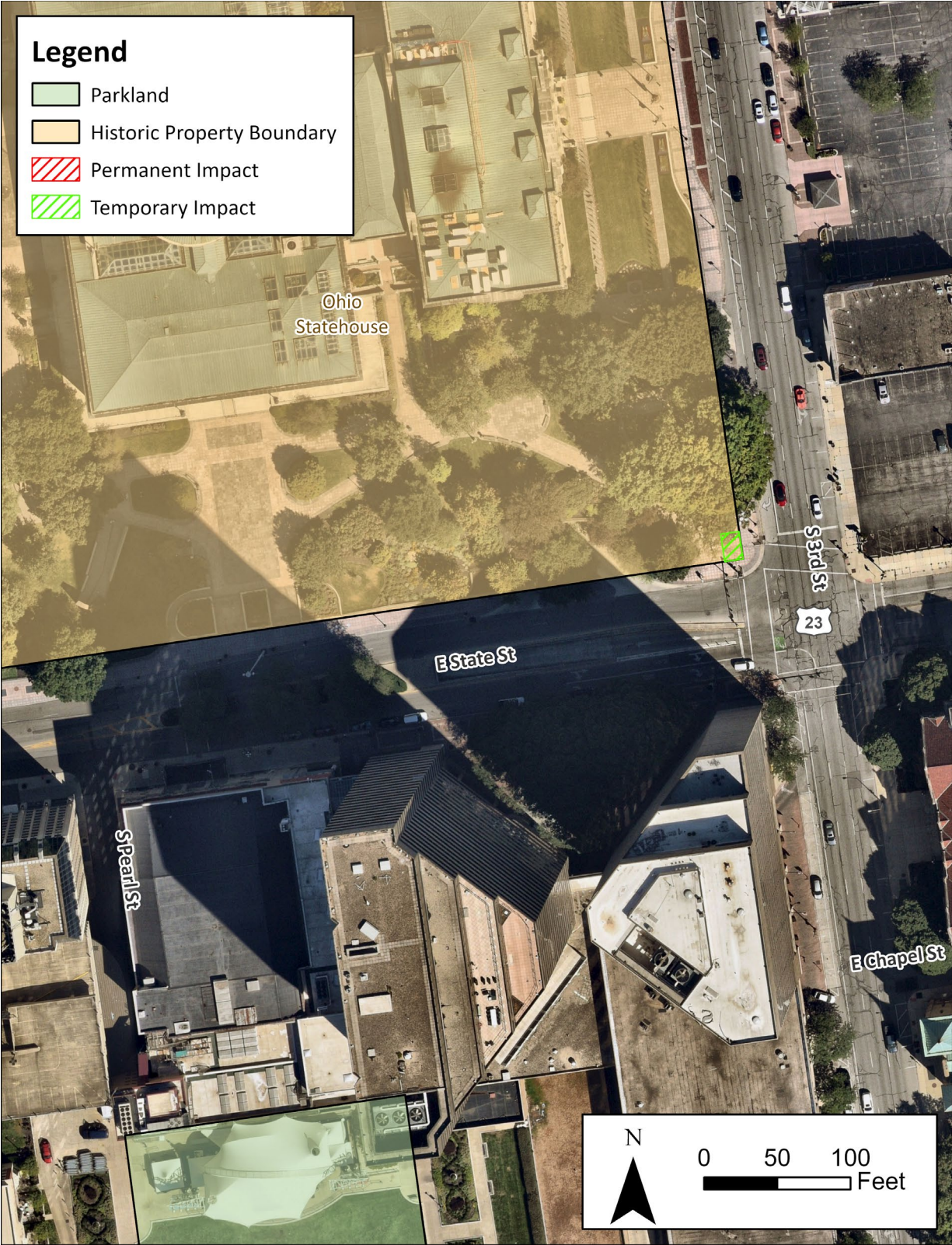
Ohio Statehouse

The Ohio Statehouse (NRHP: 72001011/OHI# FRA0065018) is located at 1 Capitol Square. This historic property was built in 1861 and is an exemplary example of nineteenth century Classical (Greek Revival) architecture. It has a period of significance ranging from 1839 to 1861 and was determined eligible under Criterion A for its associations with the broad patterns of Politics/Government, as well as Criterion C for its unique and exemplary architecture representing the significant themes during its era. It was listed in NRHP in 1972.

The project will require 343 square feet temporary ROW/work easements due to ADA grading and signal replacement along the eastern edge of the property boundary. Temporary impacts are needed to replace sidewalk, ADA infrastructure, lighting, and the traffic signal adjacent to and within the statehouse property. The existing infrastructure is within the statehouse property limits and is being updated to current standards. Impacts are shown on **Figure 10**.

A Section 106 finding of No Adverse Effect has been made with respect to the project impacts at the Ohio Statehouse. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply and that no Section 4(f) use of this property would result from project implementation. (see **Appendix A**).

Figure 10: Impacts to Ohio Statehouse



5. SECTION 4(F) COORDINATION

Section 4(f) requires coordination with OWJs over the findings and determinations described above (see 23 USC § 138).

The OWJ for Blackburn Park, Pump House Park, and Alum Creek Trail is the City of Columbus Recreation and Parks Department. Meetings specifically with Recreation and Parks to discuss park and trail impacts occurred in August 2024 and April 2026. Staff have also been part of several design meetings that took place in 2024 and 2025 to discuss design issues, including implications at both Blackburn and Pump House parks. Current design reflects input from Recreation and Parks staff. City of Columbus Recreation and Parks concurred with the *de minimis* determination in **September 2026 [pending]**.

The OWJ for the impacted historic properties (Trinity Episcopal Church and Ohio Statehouse) is the Ohio SHPO. Consultation with the SHPO was initiated in 2024. Based on the Section 106 finding of No Adverse Effect for the project, implementing the project will not result in Section 4(f) use of these properties.

6. CONCLUSION

Based on the above analysis, the FTA finds that the proposed project will not result in a use of any property protected under Section 4(f). Therefore, the requirements of Section 4(f) do not apply to the proposed project.

APPENDIX A: SHPO DETERMINATION LETTER

(updated letter pending)



In reply, please refer to:
2024-FRA-63038

August 15, 2025

Anthony W. Greep
Director
Office of Planning and Program Development
Region 5 Office
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, IL 60606

**RE: COTA East Main Street Bus Rapid Transit Corridor Project; Section 106 Continued
Consultation, Eligibility and Effects Determinations, and Request for Concurrence**

Dear Mr. Greep,

This is in response to the correspondence received on July 2, 2025, regarding the above-mentioned project. The comments of the Ohio State Historic Preservation Office (SHPO) are made in accordance with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108 [36 CFR 800]).

This project proposes 13.6 miles Bus Rapid Transit (BRT) corridor with 17 stations along East Main Street from Downtown Columbus through Reynoldsburg in Franklin County and Licking County, Ohio. It is expected to operate eight miles on a dedicated guideway with the remainder in mixed traffic lanes and will be served by 17 stations. The project spans approximately 13.6 miles through four different cities and two townships in two counties. It includes two 0.27-mile sections of W. Spring Street and E. Long Street between Wall Street and N. 3rd Street, a 0.08-mile portion of N. Wall Street adjacent to the Spring Street COTA terminal, and 0.85 miles of N. 3rd Street between Spring and Main Streets. The main portion of the project stretches 12.85 miles along E. Main Street between N. 3rd Street in Franklin County and Eastwood Drive in Licking County. The Limits of Disturbance (LOD) span approximately 9.1 miles over a total distance of 13.6 miles. COTA is seeking to construct 17 individual bus stations that range in locations throughout the project area. Additionally, the project will demolish two of the three existing buildings at the Greyhound Bus Terminal at 111 E. Town Street to accommodate the station location at 3rd Street and Rich Street. The terminal building and the smaller building in the southwest corner are to be removed; the masonry building at the southeastern corner will remain. COTA is also intending to build a new Park & Ride facility at the east end of the line. The site would be developed into an end-of-line facility which includes parking, bus bays, landscaping, passenger amenities, and driver facilities. This location is at the far eastern end of the BRT line, south of newly constructed multi-family housing. These two work areas will occur outside of existing ROW.

The submission's combined literature review and field investigations identified forty-two resources within the APE, including one (1) National Historic Landmark, and two (2) properties listed in the National Register of Historic Places (NRHP). The survey report recommended that the proposed undertaking would

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COTA East Main Street Bus Rapid Transit Corridor Project

August 15, 2025

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result in an adverse effect to the Greyhound Bus Terminal as a result of the proposed demolition. The SHPO agrees with these findings.

Therefore, based on the information provided, it is the opinion of the SHPO that the planned work, if completed as proposed, will have an Adverse Effect on the historic property of the Greyhound Bus Terminal. If no alternative to the demolition can be found, the applicant, FTA, and the SHPO need to agree on appropriate mitigation for the construction. The process used to reach this decision, and the mitigation will be memorialized in a Memorandum of Agreement (MOA). We recommend that you identify, and contact interested consulting parties (i.e. Columbus Landmarks, Heritage Ohio, Preservation Ohio, the public, etc.) so that they may provide comments on options to avoid, minimize, or mitigate the adverse effect. Finally, FTA should notify the Advisory Council on Historic Preservation (ACHP) that consultation to resolve the adverse effect has been initiated with our office. After the ACHP has been notified, we will move forward in trying to resolve the adverse effect through mitigation and the execution of an MOA that is acceptable to all parties.

Please note that this determination of effects is for above-ground resources only. The archaeological component of the project is being coordinated separately. Our office looks forward to additional coordination for the project with the Federal Transit Administration.

If you have any questions, please contact Abigail Rosenow at arosenow@ohiohistory.org. Thank you for your cooperation.

Sincerely,



Kristen Koehlinger, Department Head and Deputy State Historic Preservation Officer
Resource Protection & Review

"Please be advised that this is a Section 106 decision. This review decision may not extend to other SHPO programs."

RPR Serial No: 1109745

OHIO HISTORY CONNECTION

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APPENDIX B: OWJ CONCURRENCE

