State Revolving Fund Loan Programs

Drinking Water, Clean Water, Nonpoint Source

ENVIRONMENTAL ASSESSMENT
AND
FINDING OF NO SIGNIFICANT IMPACT

CITIZENS ENERGY GROUP
PROJECT Q – LAFAYETTE ROAD (21ST TO 56TH) WATER MAIN EXTENSION
SRF PROJECT DW 24 70 06 05 and DW 25 06 49 06

DATE: November 23, 2023

PUBLIC COMMENTS DUE BY: December 23, 2026

I. INTRODUCTION

The above entity has applied to the Indiana Finance Authority (IFA) Programs for a loan to finance all or part of the Drinking Water project described in the accompanying Environmental Assessment (EA). As part of facilities planning requirements, an environmental review has been completed which addresses the project's impacts on the natural and human environment. This review is summarized in the attached EA, which can also be viewed in color at http://www.in.gov/ifa/srf/.

II. PRELIMINARY FINDING OF NO SIGNIFICANT IMPACT (FONSI)

The SRF Drinking Water Program has evaluated all pertinent environmental information regarding the proposed project and determined that an Environmental Impact Statement is not necessary. Subject to responses received during the 30-day public comment period, and pursuant to Indiana Code 5-1.2-3, it is our preliminary finding that the construction and operation of the proposed facilities will result in no significant adverse environmental impact. In the absence of significant comments, the attached EA shall serve as the final environmental document.

III. COMMENTS

All interested parties may comment upon the EA/FONSI. Comments must be received at the address below by the target approval date above. Significant comments may prompt a reevaluation of the preliminary FONSI; if appropriate, a new FONSI will be issued for another 30-day public comment period. A final decision to proceed, or not to proceed, with the proposed project shall be affected by finalizing, or not finalizing, the FONSI as appropriate. Comments regarding this document should be sent within 30 days to:

State Revolving Fund
100 N. Senate Ave. IGCN 1275
Indianapolis, IN 46204
publiccomments@ifa.in.gov

ENVIRONMENTAL ASSESSMENT

I. PROJECT IDENTIFICATION

Project Name and Address:	Project Q – Lafayette Road (21st to 56th) Water Main Extension Citizens Energy Group 2020 North Meridan Street Indianapolis, IN 46202
SRF Project Number:	**DW 24 70 06 05 and DW 25 06 49 06**
Authorized Representative:	Jeffrey A. Harrison, President and CEO

II. PROJECT LOCATION

The proposed project is located in Marion County, Pike and Center Townships,
Indianapolis West 24k USGS Quadrangle, Township 16N, Range 3E, Sections 7, 17, 18, 20, 28, 29
Clermont 24k USGS Quadrangle, Township 16N, Range 3E, Section 7
Clermont 24k USGS Quadrangle, Township 16N, Range 2E, Section 12 See **Figures 1-3**.

III. PROJECT PURPOSE AND NEED

In concert with Lebanon Utilities (LU), an engineering plan has been developed for Citizens Water to provide an additional water supply of up to 25 million gallons per day (MGD) to Lebanon Utilities to support the regional growth of the City of Lebanon (Lebanon). The Citizens-Lebanon Water Supply program consists of new water mains, booster stations, tanks, and treatment plant upgrades. Regarding sources, Citizens Water's robust regional water system is composed of 10 water treatment plants along with natural water resources including the White River, Fall Creek, four water supply reservoirs (Eagle Creek, Geist, Citizens, and Morse), and groundwater wells.

IV. PROJECT DESCRIPTION

CLWS Project Q will construct approximately 27,000 LF of 24- and 30-inch diameter water main, along Lafayette Road, between W 21st Street and W 56th Street. The water main will connect to an existing 42-inch diameter water main, an existing 30-inch diameter water main, and proposed CLWS Project P Lafayette Booster Station & Tank.

V. ESTIMATED PROJECT COSTS, AFFORDABILITY, AND FUNDING

The total cost of this project is estimated to be approximately $25,419,000. The Citizens Energy Group intends to finance the project with a loan from IFA Programs for a term and annual fixed interest rate to be determined at loan closing. Monthly user rates and charges may need to be analyzed to determine if adjustments are required for loan repayment.

VI. DESCRIPTION OF EVALUATED ALTERNATIVES

The **"No Action"** alternative includes continuing current operations under existing conditions. The risk posed by not taking action is the inability to provide adequate water supply as required for the Citizens Lebanon Water Supply program.

Alternative 1 – Installation of 24-inch DI and 3-inch HDPE Main Within a Combination of Easements and ROW: This alternative includes the construction of approximately 27,000 LF of 24-30 inch diameter water main along Lafayette Road. Jack and bore installation using ductile iron pipe and a steel casing pipe is anticipated for the crossing of I-65 per INDOT requirements and a CSX railroad per CSX requirements. Horizontal directional drill of HDPE pipe will be utilized in areas unsuitable for open cut installation.

VII. Environmental Impacts of the Feasible Alternatives

A. Direct Impacts of Construction and Operation

Disturbed/Undisturbed Land: Work related to the installation of the water main extension will occur in disturbed land, primarily easements with grass cover and pavement. The project will be primarily located under existing road or in an easement in green space immediately adjacent to existing roadways.

See correspondence dated September 24, 2026, from the Indiana Department of Natural Resources Division of Historic Preservation and Archaeology in Appendix B.

Structural Resources: Construction and operation of the project will not alter, demolish or remove historic properties. If any visual or audible impacts to historic properties occur, they will be temporary and will not alter the characteristics that qualify such properties for inclusion in or eligibility for the National Register of Historic Places. The SRF's finding pursuant to Section 106 of the National Historic Preservation Act is: "*no historic properties affected.*"

See correspondence dated September 24, 2026, from the Indiana Department of Natural Resources Division of Historic Preservation and Archaeology in Appendix B.

Surface Waters: The project will not adversely affect outstanding state resource waters listed in 327 IAC 2-1.3-3(d), exceptional use streams listed in 327 IAC 2-1-11(b), Natural, Scenic and Recreational Rivers and Streams listed in 312 IAC 7-(2), or Salmonid Streams listed in (327 IAC 2-1.5-5(a)(3) or streams on the Outstanding River List for Indiana. The project will cross Little Eagle Creek. The stream will be crossed via trenchless installation to avoid stream impacts. .

Mitigation measures to lessen and compensate for stream impacts cited in comment letters or permits from the Indiana Department of Natural Resources , U.S. Army Corps of Engineers, and/or Indiana Department of Environmental Management will be implemented.

Wetlands: Wetlands will not be impacted by the construction or operation of the proposed project. Proper erosion control measures will be used near wetlands.

Mitigation measures to lessen and compensate for wetland impacts cited in comment letters or permits from the Indiana Department of Natural Resources , U.S. Army Corps of Engineers, and/or Indiana Department of Environmental Management will be implemented.

Floodplain: The project will not include dredge or fill in the floodway without a permit from IDNR Division of Water. The proposed project site is within a 100-year floodway. Mitigation measures cited in comment letters or permits by the Indiana Department of Natural Resources will be implemented.

See correspondence dated August 15, 2026, from the Department of Natural Resources Environmental Unit in Appendix B.

Groundwater: The project will not impact a drinking water supply or sole source aquifer.

Plants and Animals: The proposed project items will be implemented to minimize impact to non-endangered species and their habitat. Some tree clearing may be necessary for the water main installation. Construction efforts will be made to minimize tree removal and to complete necessary tree removal outside of active bat season. Mitigation measures cited in comment letters from the Department of Natural Resources and the U.S. Fish and Wildlife Service will be implemented.

See the USFWS Official Species List, dated October 25, 2024, and correspondence from the USFWS dated April 8, 2025, in Appendix B.

Prime Farmland: The project will not convert prime farmland.

See correspondence dated December 13, 2024, from the Natural Resources Conservation Service in Appendix B.

Air Quality: Construction activities may generate some noise, fumes and dust, but should not significantly affect air quality.

Open Space and Recreational Opportunities: The project will neither create nor destroy open space or recreational opportunities.

Lake Michigan Coastal Program: The project will not affect the Lake Michigan Coastal Zone.

National Natural Landmarks: Construction and operation of the proposed project will not affect National Natural Landmarks.

B. Indirect Impacts

The Citizens Energy Group's Preliminary Engineering Report (PER) states: Citizens Energy Group's PER states: *It will be ensured, through local zoning laws, the authority of its council or planning commission, or other means, that future development and utility projects connecting to SRF-funded facilities will not adversely affect wetlands, wooded areas, steep slopes, archaeological/historical/structural resources, or other sensitive environmental resources. New development and utility projects will be required to be constructed within the guidelines of the USFWS, IDNR, IDEM, and other environmental review authorities.*

VIII. MITIGATION MEASURES

Citizens Energy Group's PER states:
Construction activities are expected to take place during standard working hours. Any night work will be considered on a case-by-case basis. If night work occurs, mitigation measures will be put in place to limit light and noise impacts.

Adequate erosion control measures will be practiced on-site during all construction activities. Mitigation measures to be used at the site may include, but are not limited to, the following:

- *Implement appropriate erosion control measures, such as, inlet protection, rock check dams, rip-rap, seeding, mulching, and erosion control mats;*
- *Restoring and stabilizing drainage systems and patterns as soon as possible;*

- *Avoiding tracking construction debris and soil onto roadways;*
- *Wetting areas of exposed soil as needed to control dust;*
- *Keeping materials and equipment needed for spill cleanup readily available;*
- *Locating on-site equipment fueling, repair, and maintenance areas away from drainage courses and stormwater structures;*
- *Recycling wastes such as grease, used oil filters, antifreeze, cleaning solutions, automotive batteries, and hydraulic/transmission fluids, and providing secondary containment/covers for these materials if stored on-site;*
- *Properly disposing of used oils, fluids, and lubricants off-site;*
- *Using only watertight dumpsters for on-site debris collection and providing regular removal of accumulated waste;*
- *Collecting trash from the site often since erosion control devices tend to collect debris;*
- *Inspecting the erosion control devices at least once per week and after each storm event to ensure proper operation;*
- *Covering and storing paints and solvents in their appropriate containers on a previously disturbed or paved level site.*

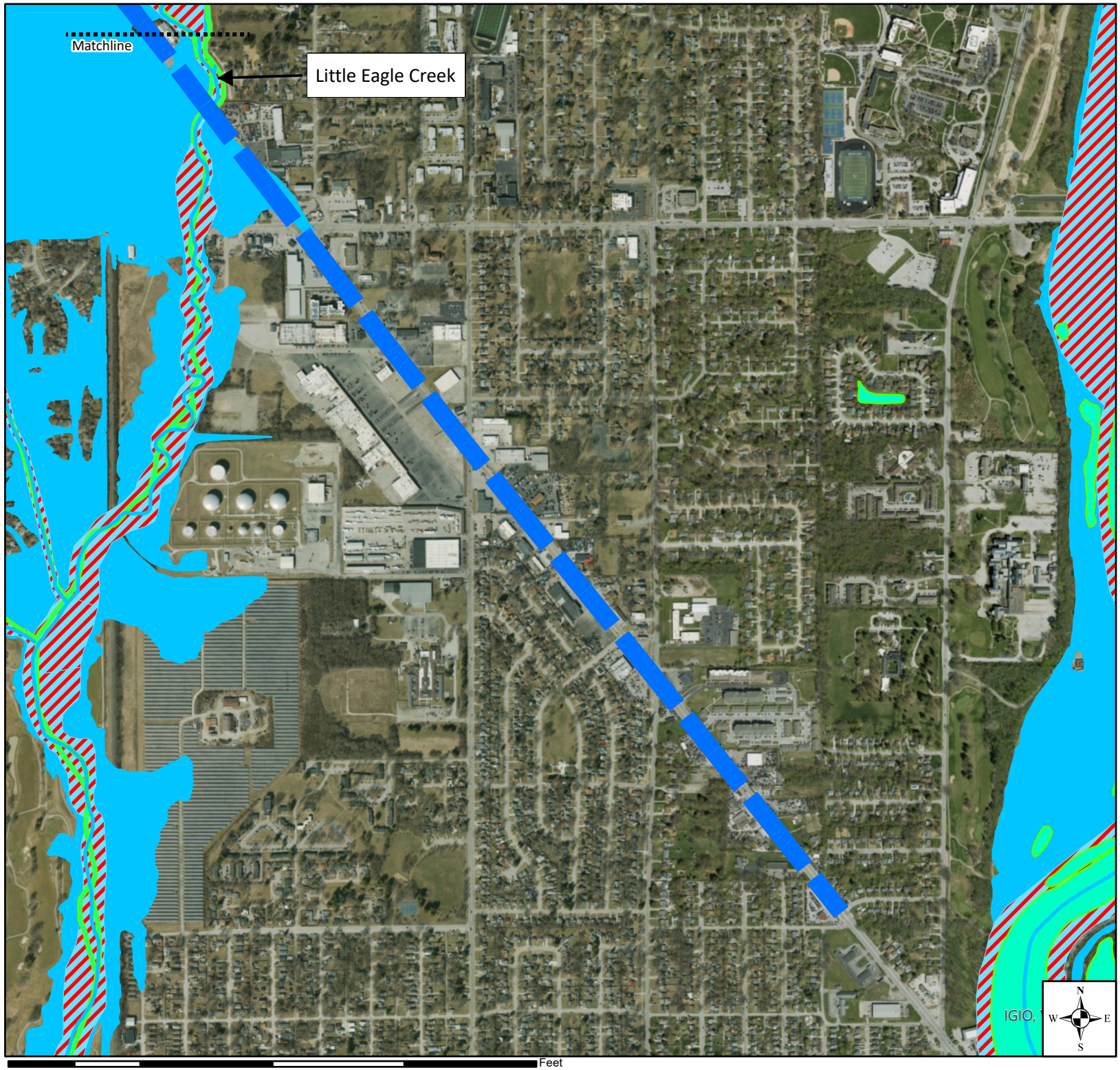
IX. PUBLIC PARTICIPATION

A properly noticed public hearing was held on September 25, 2024, at 8 am in the Citizens Energy Group Board Room located at 2150 Martin Luther King, Jr. Street, Indianapolis, IN 46202. Four members of the public expressed concerns during the hearing. Those comments were heard and recorded. Five written comments were received following the meeting. All comments were responded to in a timely manner.

Additionally, a properly noticed public comment period was held from December 17, 2024, through January 6, 2025. No comments were received during this period.

Citizens Energy Group's website is frequently updated with information related to the Citizens-Lebanon Water Supply Program and can be found at https://info.citizensenergygroup.com/clws.

Appendix A
Graphics

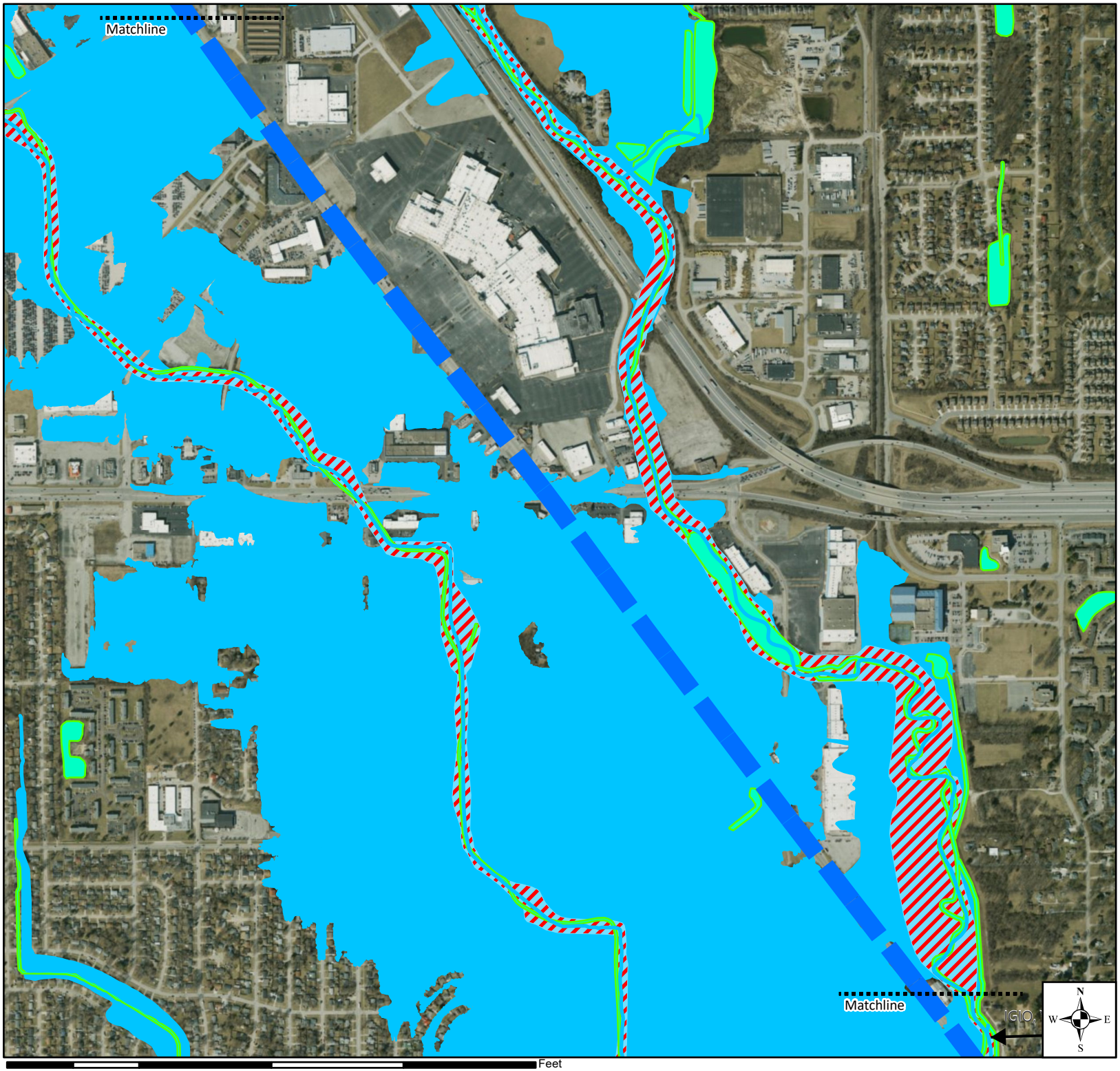


citizens energy group™

May 2026

- Proposed Water Main
- Streams
- Wetlands NWI (USFWS)
- Floodplain
- Floodway

Figure 1
Environmental Map
Citizens-Lebanon Water Supply Program
Project Q - Lafayette Rd (21st to 56th)
Water Main Extension



citizens energy group™

May 2026

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Figure 2
Environmental Map
Citizens-Lebanon Water Supply Program
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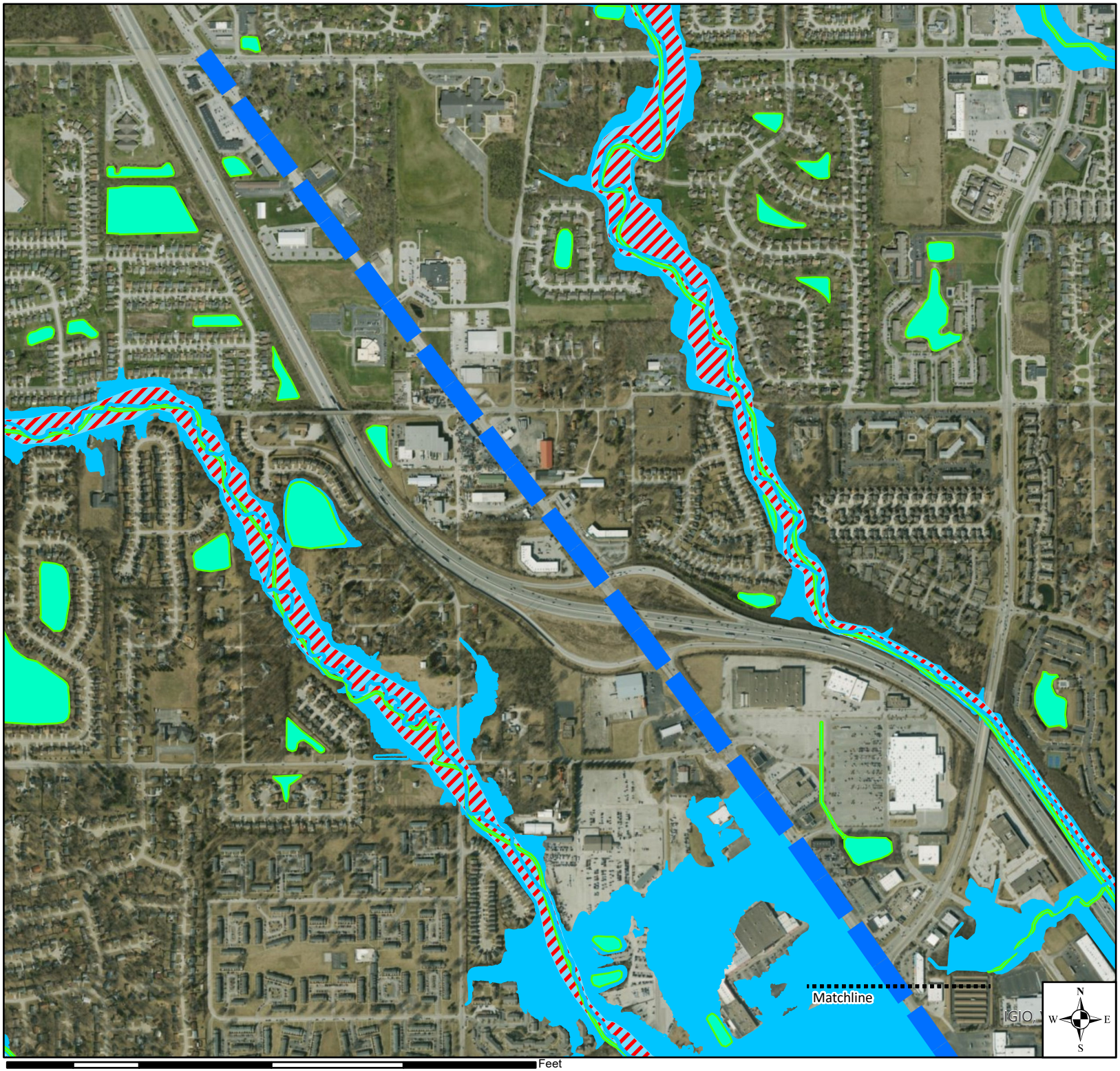

citizens energy group™

May 2026

- Proposed Water Main
- Streams
- Wetlands NWI (USFWS)
- Floodplain
- Floodway

Figure 3
Environmental Map
Citizens-Lebanon Water Supply Program
Project Q - Lafayette Rd (21st to 56th)
Water Main Extension

Appendix B
Agency Coordination

DNR Indiana Department of Natural Resources

Mike Braun, Governor
Alan Morrison, Director

Division of Historic Preservation & Archaeology·402 W. Washington Street, W274·Indianapolis, IN 46204-2739
Phone 317-232-1646·Fax 317-232-0693·dhpa@dnr.IN.gov

September 24, 2026

Jenni Curry
Environmental Section Manager
SRF Program, IGCN 1275
100 North Senate Avenue
Indianapolis, Indiana 46204

Re: Revised project information regarding the Citizens Energy Group Project Q – Lafayette Road (21st to 56th) water main extension using State Revolving Loan funds through the Indiana Finance Authority (SRF Project DW 24 70 06 05; DHPA #34369)

Dear Ms. Curry:

Pursuant to Indiana Code 5-1.2-10, Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), and 36 C.F.R. Part 800, the Indiana State Historic Preservation Officer ("Indiana SHPO") is conducting an analysis of the materials dated and received by the Indiana SHPO on September 11, 2026, for the above indicated project in Pike and Center Township, Marion County, Indiana.

Based on our analysis, it has been determined that no historic properties will be altered, demolished, or removed by the proposed project.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and 29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. 800.

If you have any further questions regarding this determination, please contact the DHPA. Questions about archaeological issues should be directed to Cathy Draeger-Williams at (317) 234-3791 or cdraeger-williams@dnr.IN.gov. Questions about historic buildings or structures pertaining to this project should be directed to Kami Cai at (317) 233-3883 or scai@dnr.IN.gov. Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #34369.

Very truly yours,

Beth K. McCord
Deputy State Historic Preservation Officer
Director, Division of Historic Preservation & Archaeology

BKM:KC:CDW:cdw

emc: Jenni Curry, Indiana Finance Authority

From:	DNR Environmental Review
To:	Curry, Jennifer; DNR Environmental Review
Subject:	RE: Citizens Energy Group Project Q Lafayette Rd 21st to 56th [ER-27640]
Date:	Thursday, October 30, 2025 2:54:28 PM
Attachments:	image003.wmz image004.png image005.png

Hi Jennifer,
The changes proposed to this project are minimal and therefore, our previous recommendations should be sufficient.
Please let me know if you have any questions. Thanks for keeping us updated.

Kind regards,

Elizabeth Adkins (she/her)
Environmental Program Coordinator
Indiana Department of Natural Resources
Division of Fish, Wildlife, and Nature Preserves: Environmental Unit
(317) 234-2719
EAdkins@dnr.IN.gov
dnr.IN.gov/fish-and-wildlife

From: Curry, Jennifer <JeCurry@ifa.IN.gov>
Sent: Thursday, October 30, 2025 10:45 AM
To: DNR Environmental Review <environmentalreview@dnr.IN.gov>
Subject: RE: Citizens Energy Group Project Q Lafayette Rd 21st to 56th [ER-27640]

Hello,

Project Q has added approximately 1,090 linear feet of pipe to water main. I have attached the originally reviewed map in this area and the updated map. You can see the pipe moving beyond the pink booster station to 56th Street. Do you see any issue with this addition?

Jenni Curry
Environmental Section Manager
Clean Water Program Manager
State Revolving Fund Loan Program
INDIANA FINANCE AUTHORITY
100 North Senate Ave., STE 1275
Indianapolis, IN 46204
463-261-6943 jecurry@ifa.in.gov

From: DNR Environmental Review <environmentalreview@dnr.IN.gov>

THIS IS NOT A PERMIT

State of Indiana
DEPARTMENT OF NATURAL RESOURCES
Division of Fish and Wildlife
Early Coordination/Environmental Assessment

DNR#: ER-27640

Request Received: July 18, 2025

Requestor:
Jennifer Curry
Indiana Finance Authority
100 North Senate Avenue, Suite 1275
Indianapolis, IN 46204

Project:
Project Q - Lafayette Rd (21st to 56th) Water Main Extension: extension of an existing water main to the proposed Project P via horizontal directional drilling, from northwest of 21st Street to southeast of West 56th Street; SRF #DW 24 70 06 05

County/Site Info: Marion County

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

If our agency has regulatory jurisdiction over the project, the recommendations contained in this letter may become requirements of any permit issued. If we do not have permitting authority, all recommendations are voluntary.

Regulatory Assessment:
This proposal will require the formal approval for construction in a floodway under the Flood Control Act, IC 14-28-1, unless it qualifies for a general license under Administrative Rule 312 IAC 10-5 that applies to utility line crossings (see enclosure). Please include a copy of this letter with the permit application if the project does not meet the general license criteria.

Natural Heritage Database:
The Natural Heritage Program's data have been checked. Eagle Creek Park (LWCF), a Migratory Bird Concentration Area, a Raptor Migratory Concentration Area, and the State special concern Common Nighthawk (*Chordeiles minor*) have been documented within 0.5 mile of the project area.

Fish and Wildlife Comments:
Avoid and minimize impacts to fish, wildlife, and botanical resources to the greatest extent possible, and compensate for impacts. The following are recommendations that address potential impacts identified in the proposed project area:

A) Heritage Species
The Division of Fish and Wildlife does not anticipate any significant impacts to the Migratory Bird Concentration Area, Raptor Migratory Concentration Area, or Common Nighthawk due to this project.

B) Directional Boring/Open Trenching
Directional boring is the preferred method for crossing streams with utility lines. Install erosion control measures such as silt fence or other appropriate measures around directional drilling pits to prevent drilling mud from leaving the immediate area of the pit or entering the stream. The Division of Fish and Wildlife

understands directional boring is not always an option. When using the open trench method, the utility line must be installed as quickly as possible to avoid silt and sediment loading of the stream. The utility line must be covered with graded stone and riprap to prevent erosion of the streambed in the vicinity of the crossing. For streambed stabilization, riprap or other stabilization materials must not be placed in the active stream channel above the existing streambed elevation. This is to prevent obstructions to the movement of aquatic organisms upstream and downstream. Regardless of the installation method used, the utility line must be installed below the existing streambed elevation at least 3 feet, measured perpendicularly to the utility line, between the lowest point of the streambed and the top of the pipeline or its encasement, whichever is higher.

C) Wetlands
Due to the presence or potential presence of wetland habitat on site, we recommend contacting and coordinating with the Indiana Department of Environmental Management (IDEM) 401 program and the US Army Corps of Engineers (USACE) 404 program. (https://www.usace.army.mil/Missions/Civil-Works/Regulatory-Program-and-Permits/Obtain-a-Permit/).

D) Tree Removal
The Division of Fish and Wildlife recommends avoiding tree removal along roadways to the greatest extent possible and replacing trees that must be removed to maintain the economic, aesthetic, and ecological benefits provided by trees. The following links give a good overview of the benefits of a street tree program and how to select the right species to avoid the negative impacts of non-native invasive species such as the common and popular Bradford pear: https://www.in.gov/dnr/forestry/forestry-publications-and-presentations/ (scroll down to the Community & Urban Forestry section).

We recommend a mitigation plan be developed (and submitted with the permit application, if required) for any unavoidable habitat impacts that will occur. The DNR's Habitat Mitigation Guidelines (and plant lists) can be found online at: https://www.in.gov/nrc/files/IB-17.pdf.

Impacts to non-wetland forest of one (1) acre or more in a rural or urban area should be mitigated at a minimum 2:1 ratio based on area of impact. Impacts to non-wetland forest under one (1) acre but at least 0.10 acre in a rural or urban area should be mitigated at a minimum 1:1 ratio based on area of impact. Impacts under 0.10 acre in a rural area typically do not require mitigation or additional plantings beyond seeding and stabilizing disturbed areas, though there are exceptions for high quality habitat sites. Impacts under 0.10 acre in an urban area should be mitigated by replacing each mature tree removed (trees that are 10” diameter-at-breast height (dbh)) with two native trees of 3-gallon stock or larger. Seeding and stabilizing disturbed areas is required regardless of the impact amount and location.

The mitigation site should be located in the floodway, downstream of the one (1) square mile drainage area of that stream (or another stream within the 8-digit HUC, preferably as close to the impact site as possible) and adjacent to existing forested riparian habitat.

The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:

1. Revegetate all bare and disturbed areas that are not currently mowed and maintained with a mixture of grasses, sedges, and wildflowers native to Central Indiana and specifically for stream bank/floodway stabilization purposes as soon as possible upon completion; turf-type grasses (including low-endophyte, friendly endophyte, and endophyte free tall fescue but excluding all other varieties of tall fescue) may be used in currently mowed areas only. A native herbaceous seed mixture must include at least 5 species of grasses and sedges and 5 species of wildflowers.
2. Minimize and contain within the project limits in-channel disturbance and the clearing of trees and brush.
3. Do not work in the waterway from April 1 through June 30 without the prior written approval of the Division of Fish and Wildlife.
4. Do not cut any trees suitable for Indiana Bat or Northern Long-eared Bat roosting (3 inches or greater diameter-at-breast height, living or dead, with loose hanging bark, or with cracks, crevices, or cavities) from April 1 through September 30.

5. Do not construct any temporary runarounds, access bridges, causeways, cofferdams, diversions, or pumparounds.
6. Use minimum average 6-inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids.
7. Do not use broken concrete as riprap.
8. Underlay the riprap with a bedding layer of well graded aggregate or a geotextile to prevent piping of soil underneath the riprap.
9. Minimize the movement of resuspended bottom sediment from the immediate project area.
10. Do not deposit or allow construction/demolition materials or debris to fall or otherwise enter the waterway. Any incidental fallen material or debris in the waterway must be removed within 24 hours using best management practices, particularly lifting material out of the waterway and not dragging it across the streambed whenever possible.
11. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the waterbody or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.
12. Seed and protect all disturbed streambanks and slopes not protected by other methods that are 3:1 or steeper with erosion control blankets that are heavy-duty, biodegradable, and net free or that use loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.

Contact Staff:
Our agency appreciates this opportunity to be of service. Please contact me at eadkins@dnr.IN.gov or (317) 234-2719 if we can be of further assistance.

Elizabeth Adkins **Date:** August 15, 2025
Elizabeth Adkins
Environmental Program Coordinator
Division of Fish and Wildlife

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Indiana Ecological Services Field Office
620 South Walker Street
Bloomington, IN 47403-2121
Phone: (812) 334-4261 Fax: (812) 334-4273

In Reply Refer To: 10/25/2024 18:41:08 UTC
Project Code: 2025-0011347
Project Name: Project Q - Lafayette Rd (21st to 56th) Water Main Extension

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

Please use the species list provided and visit the U.S. Fish and Wildlife Service's Region 3 Section 7 Technical Assistance website at - http://www.fws.gov/midwest/endangered/section7/s7process/index.html. This website contains step-by-step instructions which will help you

determine if your project will have an adverse effect on listed species and will help lead you through the Section 7 process. For all **wind energy projects** and **projects that include installing towers that use guy wires or are over 200 feet in height**, please contact this field office directly for assistance, even if no federally listed plants, animals or critical habitat are present within your proposed project or may be affected by your proposed project.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of

Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. **Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.**

Attachment(s):

- Official Species List
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Indiana Ecological Services Field Office
620 South Walker Street
Bloomington, IN 47403-2121
(812) 334-4261

PROJECT SUMMARY

Project Code: 2025-0011347
Project Name: Project Q - Lafayette Rd (21st to 56th) Water Main Extension
Project Type: Water Supply Pipeline - New Constr - Below Ground
Project Description: The Lafayette Rd (21st to 56th) Water Main Extension is located in the northwest corner of Indianapolis, Indiana, beginning northwest of the intersection of Lafayette Rd and W 21st St and ending southeast of the intersection of Lafayette Rd and W 56th St. The project includes the installation of approximately 25,910 feet of 24-inch ductile iron (DI) and/or 30-inch high density polyethylene pipe (HDPE). Up to 93 parcels are expected to be affected. The project will be constructed in 2026 and 2027.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@39.82325695,-86.23385926777229,14z



Counties: Marion County, Indiana

ENDANGERED SPECIES ACT SPECIES

There is a total of 5 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Indiana Bat *Myotis sodalis* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Endangered
Tricolored Bat *Perimyotis subflavus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

BIRDS

NAME	STATUS
Whooping Crane *Grus americana* Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/758	Experimental Population, Non-Essential

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

BALD & GOLDEN EAGLES

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to Bald Eagle Nesting and Sensitivity to Human Activity

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

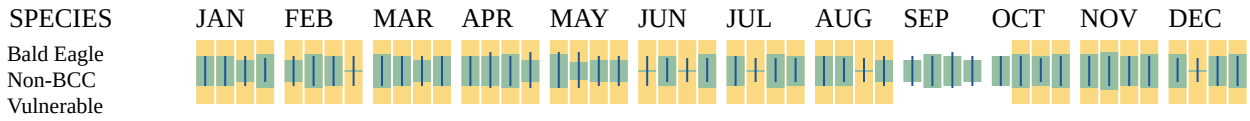
Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort – no data



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

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1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Golden-plover *Pluvialis dominica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10561	Breeds elsewhere

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Aug 31
Black-billed Cuckoo *Coccyzus erythropthalmus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399	Breeds May 15 to Oct 10
Bobolink *Dolichonyx oryzivorus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454	Breeds May 20 to Jul 31
Cerulean Warbler *Setophaga cerulea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974	Breeds Apr 21 to Jul 20
Chimney Swift *Chaetura pelagica* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406	Breeds Mar 15 to Aug 25
Eastern Whip-poor-will *Antrostomus vociferus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10678	Breeds May 1 to Aug 20
Grasshopper Sparrow *Ammodramus savannarum perpallidus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8329	Breeds Jun 1 to Aug 20
Henslow's Sparrow *Centronyx henslowii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3941	Breeds May 1 to Aug 31
Kentucky Warbler *Geothlypis formosa* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9443	Breeds Apr 20 to Aug 20
Lesser Yellowlegs *Tringa flavipes* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere

NAME	BREEDING SEASON
Pectoral Sandpiper *Calidris melanotos* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9561	Breeds elsewhere
Prothonotary Warbler *Protonotaria citrea* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9439	Breeds Apr 1 to Jul 31
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10
Rusty Blackbird *Euphagus carolinus* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9478	Breeds elsewhere
Semipalmated Sandpiper *Calidris pusilla* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9603	Breeds elsewhere
Short-billed Dowitcher *Limnodromus griseus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9480	Breeds elsewhere
Upland Sandpiper *Bartramia longicauda* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9294	Breeds May 1 to Aug 31
Wood Thrush *Hylocichla mustelina* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9431	Breeds May 10 to Aug 31

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

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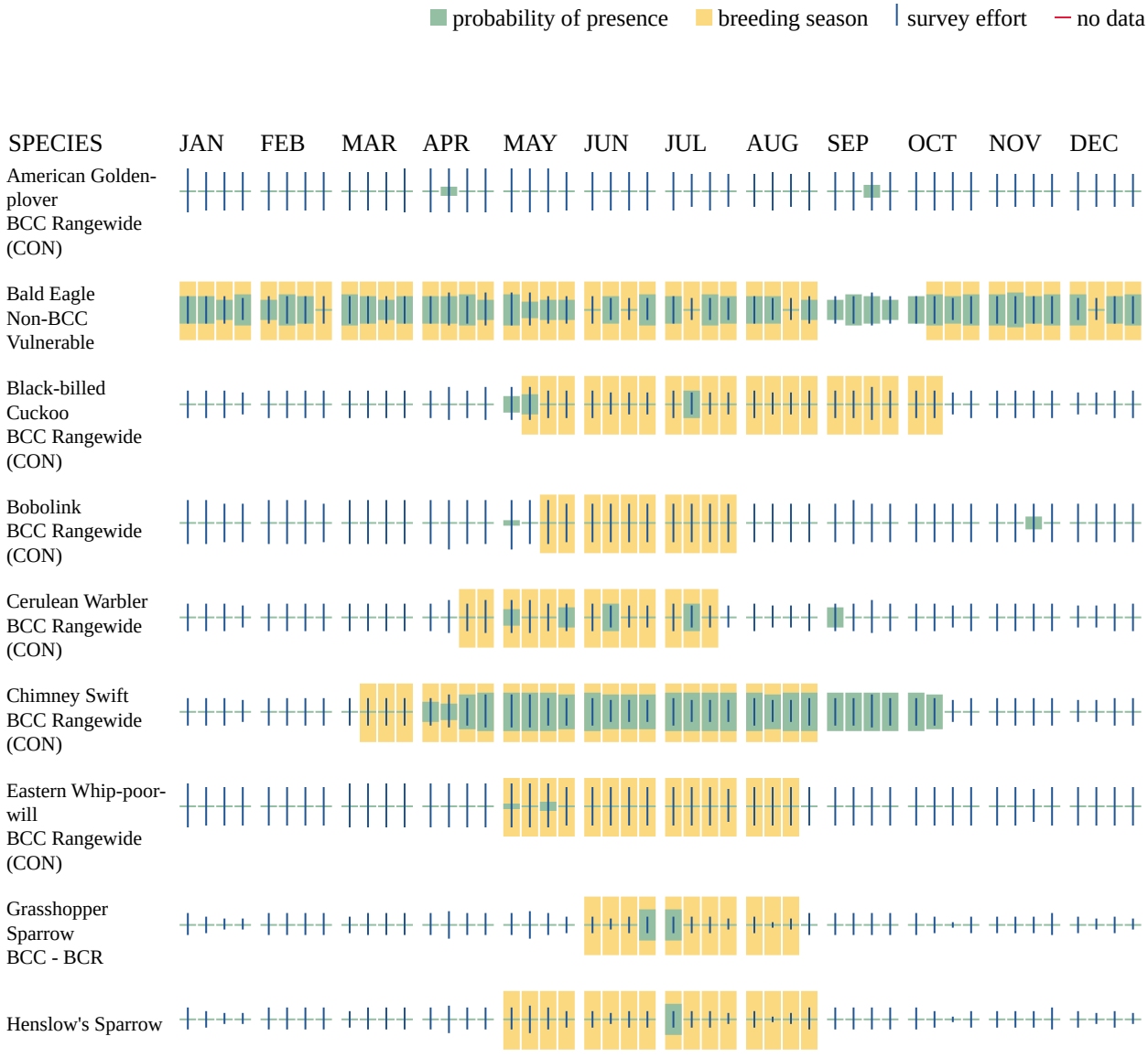

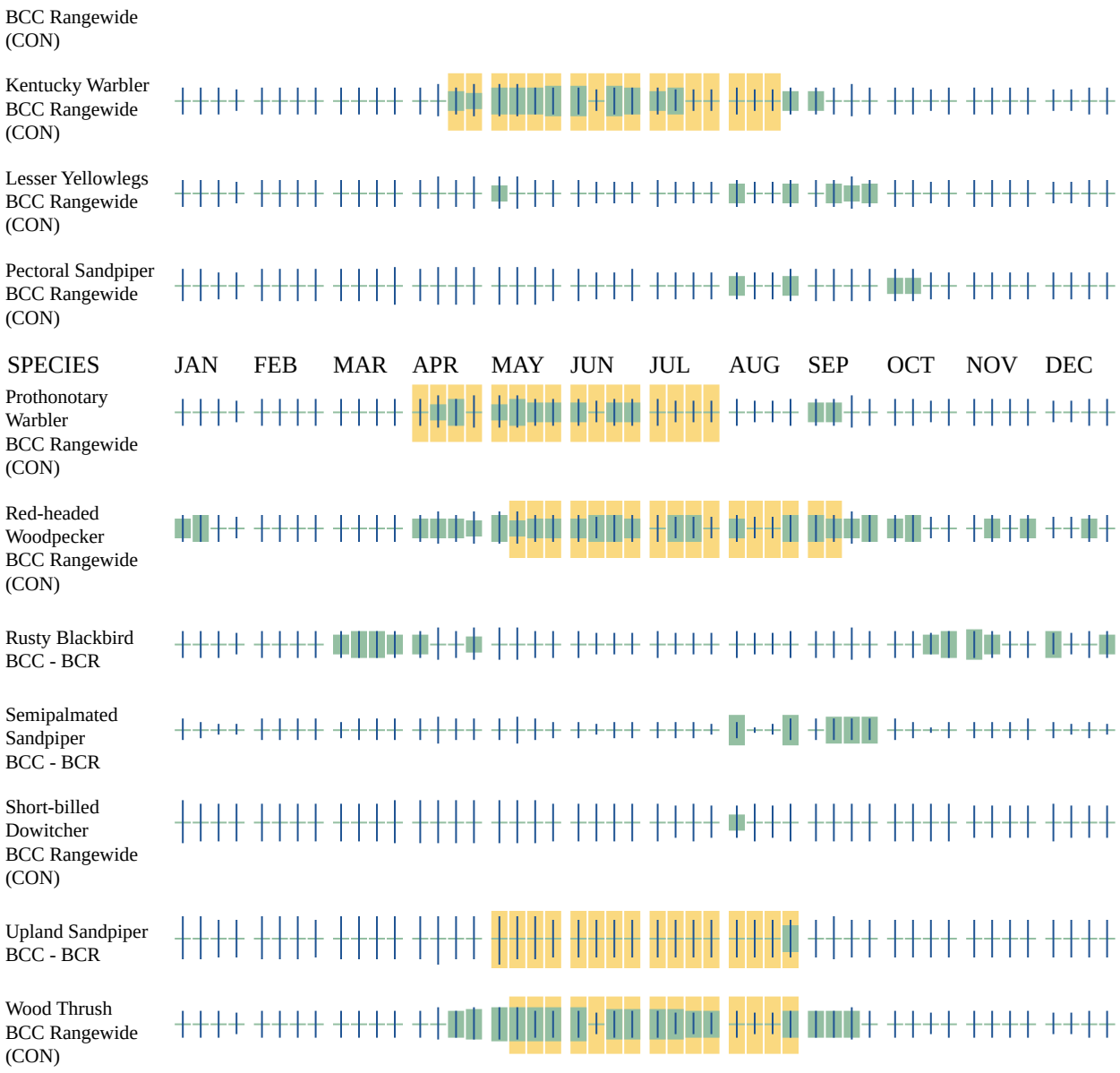

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

WETLAND INFORMATION WAS NOT AVAILABLE WHEN THIS SPECIES LIST WAS GENERATED. PLEASE VISIT HTTPS://WWW.FWS.GOV/WETLANDS/DATA/MAPPER.HTML OR CONTACT THE FIELD OFFICE FOR FURTHER INFORMATION.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Emma Mann
Address: 111 Monument Circle
Address Line 2: Suite 1200
City: Indianapolis
State: IN
Zip: 46204
Email emann@hntb.com
Phone: 3176364682

LEAD AGENCY CONTACT INFORMATION

Lead Agency: State of Indiana

Curry, Jennifer

Subject: FW: [EXTERNAL] Citizens Energy Group Water Supply Project

From: Indiana FO, FW3 <IndianaFO@fws.gov>
Sent: Tuesday, April 8, 2025 1:55 PM
To: Curry, Jennifer <JeCurry@ifa.IN.gov>
Subject: Re: [EXTERNAL] Citizens Energy Group Water Supply Project

EXTERNAL EMAIL: This email was sent from outside your organization. Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Good afternoon,

We reviewed the information you provided in your email. Please be advised pursuant to the regulations implementing section 7 (50 CFR 402) of the Endangered Species Act (Act), consultation on effects to listed species and critical habitat is an interagency process between the U.S. Fish and Wildlife Service (Service) and a Federal action agency. When a Federal action agency determines a project "may affect" listed species or critical habitat, the Federal action agency must contact the Service to complete consultation on the effects of the action. We noted in your email request you determined your project may affect but would not be likely to adversely affect listed species. We provide the following response assuming you are acting on behalf of a Federal action agency and under the authority of the Endangered Species Act of 1973, as amended.

The proposed project would occur in an approximately 20-mile^2 area in the area where Hendricks, Marion, Boone, and Hamilton counties intersect in Indiana. The project would require removing trees at 10 locations across the project area. At each location, the project proponent plans to remove between 0.2 and 1.6 acres of trees, totaling approximately 10 acres across the project area. You determined the trees provide suitable summer habitat for the federally endangered Indiana bat and northern long-eared bat, as well as the proposed endangered tricolored bat. The project proponent committed to remove trees between **October 1 and March 31**, which is the wintering season for all three bat species; therefore, we do not expect bats to be present at the project. Based on (1) implementing the project in the winter when bats are not present and (2) the small area of trees you plan to remove, the project will have insignificant effects on the three bat species; therefore, we agree the proposed project is not likely to adversely affect Indiana bats or northern long-eared bats, and will not jeopardize the proposed endangered tricolored bat.

This precludes the need for further consultation on this project; however, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinitiate consultation.

If the tricolored bat is listed prior to completion of the action, an updated species list should be requested in IPaC and the federal agency must review the action to determine whether consultation is required at that time. Generally, consultation would be required if the action is not yet completed and if it may still result in effects to the species. At that time, the Service will review and confirm whether this

concurrence is still appropriate. The development of significant new information or significant changes to the federal action that would alter the basis for our concurrence could warrant further coordination to ensure that appropriate steps are taken to conclude consultation.

Thank you for your coordination on the project.

Indiana Ecological Services Field Office
U.S. Fish and Wildlife Service
620 South Walker Street
Bloomington, Indiana 47403

United States Department of Agriculture

Farm Production and Conservation

Natural Resources Conservation Service

Indiana State Office
6013 Lakeside Boulevard
Indianapolis, Indiana 46278
317-295-5800

December 13, 2024

Jason A. Hoff
111 Monument Circle, Suite 1200
Indianapolis, Indiana 46204
jhoff@hntb.com

Dear Jason Hoff:

The proposed Project Q Lafayette Road 21st to 56th, located between the intersection of Lafayette Road and West 21st Street and the southeast of the intersection of Lafayette Rd and W 56th St, in Marion County, Indiana, as referred to in your letter received November 14, 2024, will not cause a conversion of prime farmland.

If you need additional information, please contact John Allen at 317-295-5859 or john.allen@usda.gov

Sincerely,

JOHN ALLEN

Digitally signed by JOHN ALLEN
Date: 2024.12.16 09:08:07 -05'00'

JOHN ALLEN
State Soil Scientist

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