

FHWA-Indiana Environmental Document
CATEGORICAL EXCLUSION / ENVIRONMENTAL ASSESSMENT FORM
GENERAL PROJECT INFORMATION

Road No./County:	State Road (SR) 18 and SR 43 / White County
Designation Number(s):	2001828
Project Description/Termini:	<p>Pavement replacement project. / Project limits extend along SR 18 from 0.12 mile west of SR 43 (North Clawil Street) east to SR 43. Project limits extend along SR 43 from SR 18 to 0.57 mile south of SR 18 (just north of Moots Creek Bridge).</p> <p>Overall, the project extends along SR 18 and SR 43 from 0.12 mile west of SR 43 (North Clawil Street) to 0.57 mile south of SR 18 (just north of Moots Creek bridge).</p>

✓	Categorical Exclusion, Level 2 – Required Signatories: INDOT DE and/or INDOT ESD
	Categorical Exclusion, Level 3 – Required Signatories: INDOT ESD
	Categorical Exclusion, Level 4 – Required Signatories: INDOT ESD and FHWA
	Environmental Assessment (EA) – Required Signatories: INDOT ESD and FHWA
	Additional Investigation (AI) – The proposed action included a design change from the original approved environmental document. Required Signatories must include the appropriate environmental approval authority.

Approval

 INDOT DE Signature and Date INDOT ESD Signature and Date

 FHWA Signature and Date

Release for Public Involvement

 INDOT DE Initials and Date August 28, 2023 INDOT ESD Initials and Date

Certification of Public Involvement

 INDOT Consultant Services Signature and Date

INDOT DE/ESD Reviewer Signature and Date:

Randy Jane Kurtz August 25, 2023

Name and Organization of CE/EA Preparer:

 Jaime Byerly / RQAW

Note: Refer to the most current INDOT CE Manual, guidance language, and other ESD resources for further guidance regarding any section of this form.

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Part I – Public Involvement

Every Federal action requires some level of public involvement, providing for early and continuous opportunities throughout the project development process. **The level of public involvement should be commensurate with the proposed action.**

Does the project have a historic bridge processed under the Historic Bridges PA*?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If no, then: Opportunity for a Public Hearing Required?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*A public hearing is required for all historic bridges processed under the Historic Bridges Programmatic Agreement between INDOT, FHWA, SHPO, and the ACHP.

Discuss what public involvement activities (legal notices, letters to affected property owners and residents (i.e., notice of entry), meetings, special purpose meetings, newspaper articles, etc.) have occurred for this project.

Notice of Entry Letters

Notice of Entry letters were mailed to potentially affected property owners near the project area on September 23, 2021, by RQAW notifying them about the project and that individuals responsible for land surveying and field activities may be seen in the area. Refer to an example Notice of Entry letter in Appendix G, page G-1.

Section 106

To meet the public involvement requirements of Section 106, a legal notice of the Federal Highway Administration (FHWA) finding of *No Adverse Effect* was published in the Monticello *Herald Journal* on July 13, 2023. The notice offered the public an opportunity to submit comments pursuant to 36 Code of Federal Regulation (CFR) 800.2(d), 800.3(e), and 800.6(a)(4). The public comment period expired on August 12, 2023. Public comments were not received. Refer to the text of the public notice and the affidavit of publication in Appendix D, pages D-43 and D-44.

Opportunity For a Public Hearing

The Public Involvement Plan was sent to the INDOT Project Manager on March 17, 2023 (Appendix G, pages G-2 to G-4). The project will meet the minimum requirements described in the current *Indiana Department of Transportation (INDOT) Project Development Public Involvement Procedures Manual* which requires the project sponsor to offer the public an opportunity to submit comments and / or request a public hearing. Therefore, a legal notice will appear in a local publication contingent upon the release of this document for public involvement. This document will be revised after the public involvement requirements are fulfilled.

Public Controversy on Environmental Grounds

Discuss public controversy concerning community and/or natural resource impacts, including what is being done during the project to minimize impacts.

Currently, there is no substantial public controversy concerning impacts to the community or to natural resources.

Part II - General Project Identification, Description, and Design Information

Sponsor of the Project: INDOT INDOT District: Crawfordsville
Local Name of the Facility: SR 18 (also known locally as West Fowler Road) and SR 43 (also known locally as South Prairie Street)

Funding Source (mark all that apply): Federal State Local Other*

*If other is selected, please identify the funding source: N/A

This is page 2 of 29 Project name: SR 18 and SR 43 Pavement Replacement Date: August 23, 2023

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PURPOSE AND NEED:

The need should describe the specific transportation problem or deficiency that the project will address. The purpose should describe the goal or objective of the project. The solution to the traffic problem should NOT be discussed in this section.

Need

The need for the project is due to the deteriorated condition of the existing asphalt pavement and drainage issues along SR 18 and SR 43 from 0.12 mile west of SR 43 (North Clawil Street) to 0.57 mile south of SR 18 (just north of Moots Creek bridge). According to the *Abbreviated Engineering Assessment* (Parsons, January 2020), the existing pavement has severe fatigue cracking, potholes, and rutting. Most curbing is buried by earlier roadway overlay projects and inlet curb drains are obstructed by vegetation. Both factors decrease the effectiveness of directing stormwater to the existing inlets which results in ponding, poor drainage, and decreased pavement structural capacity. The International Roughness Index (IRI) is a statistic used to show how smooth or rough a pavement surface is; a lower IRI means a smoother pavement surface and a higher IRI means a rougher pavement surface. For these segments of roadway, the IRI is 118 inches / mile (Appendix I, pages I-32 to I-65). Per the FHWA Pavement Condition Criteria 4, the IRI for "good" pavement is less than or equal to 95.

Purpose

The purpose of the project is to improve the pavement condition to an IRI of less than or equal to 95 and enhance drainage along SR 18 and SR 43 from 0.12 mile west of SR 43 (North Clawil Street) to 0.57 mile south of SR 18 (just north of Moots Creek bridge).

PROJECT DESCRIPTION (PREFERRED ALTERNATIVE):

County: White

Municipality: Town of Brookston, Indiana

Limits of Proposed Work: Overall, the project extends along SR 18 and SR 43 from 0.12 mile west of SR 43 (North Clawil Street) to 0.57 mile south of SR 18 (just north of Moots Creek bridge).

Total Work Length (including incidental construction): 0.88 (0.12 mile along SR 18 and 0.76 mile along SR 43) Mile(s) Total Work Area: 6.6 Acre(s)

Is an Interstate Access Document (IAD)¹ required?

If yes, when did the FHWA provide a Determination of Engineering and Operational Acceptability?

Yes ¹	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
Date: <input type="text"/>	

¹If an IAD is required, a copy of the approved CE/EA document must be submitted to the FHWA with a request for final approval of the IAD.

Describe location of project including township, range, city, county, roads, etc. Existing conditions should include current conditions, current deficiencies, roadway description, surrounding features, etc. Preferred alternative should include the scope of work, anticipated impacts, and how the project will meet the Purpose and Need. Logical termini and independent utility also need to be discussed.

Location

The INDOT Crawfordsville District and the FHWA intend to proceed with a pavement replacement project. The project is along SR 43 and SR 18 in Brookston, White County, Indiana. Specifically, the project limits extend along SR 18 from 0.12 mile west of SR 43 (North Clawil Street) east to SR 43. Project limits extend along SR 43 from SR 18 to 0.57 mile south of SR 18 (just north of Moots Creek Bridge). The project is within Prairie Civil Township, Sections 15, 16, 21, and 22 of Township 25 North, Range 4 West of the Brookston U.S. Geological Survey (USGS) Quadrangle. Refer to the project area maps in Appendix B, pages B-1 to B-6.

"Project area" is used throughout this document and refers to the areas within and next to construction and right-of-way limits.

Existing Conditions

SR 18 and SR 43 are two-lane undivided highways constructed with either a shoulder or curb and gutter. Brick is underneath most of the roadway pavement. Five to 10-foot-wide sidewalks and curb ramps are present within most of

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the project area and are generally located along both sides of the roadway. The project is located within an urban area and adjacent to residential and commercial properties. The Frontier Elementary School and Juanita Waugh Park are also next to the project area. The bridge crossing Moot Creek demarcates the southern limits of the project area.

SR 18 is classified as a Major Collector roadway and consists of two 12-foot-wide travel lanes (one westbound and one eastbound) with varying width shoulders (i.e., they widen at intersecting roadway approaches) or curb and gutter. The existing right-of-way width along both sides of SR 18 varies from the edge of pavement to the back of sidewalks and widens at the intersection with SR 43 to support wider turning movements. The posted speed limit along SR 18 is 35 miles per hour (mph).

SR 43 is classified as a Principal Arterial roadway and consists of two 10-foot-wide travel lanes (one northbound and one southbound) with varying width shoulders (i.e., they widen at intersecting roadway approaches) or two 15-foot-wide travel lanes with curb and gutter. The existing right-of-way width along both sides of SR 43 varies from the edge of pavement to the back of sidewalks and widens at the intersection with West 7th Street to support wider turning movements. The posted speed limit along SR 43 is 30 mph. One driveway pipe, an 18-inch diameter corrugated metal pipe (CMP), is located within the southern project area.

The existing pavement has severe fatigue cracking, potholes, and rutting. The project area is experiencing ponding, poor drainage, and decreased pavement structural capacity. Refer to the project area photos in Appendix B, pages B-7 to B-28.

Preferred Alternative

The preferred alternative includes the following elements:

- Performing full depth pavement replacement of the roadway.
- Removing the underlying brick during the pavement replacement.
- Applying new pavement markings.
- Installing new curb and gutter.
- Repairing or replacing any damaged curb or sidewalk, as necessary.
- Repairing or replacing any damaged signage or monuments, as necessary.
- Repairing or replacing any damaged inlet curb drains, as necessary.
- Upgrading any existing guardrail end treatments that do not meet current standards, as necessary.
- Grading roadside ditches to Moots Creek, as necessary.
- Constructing an outfall pipe that outlets into a ditch that drains into Moots Creek.
- Replacing the 18-inch diameter CMP in-kind.
- Installing a new underdrain system.
- Installing a new storm sewer trunk line that varies in diameter from 24 to 54-inches.
- Reconstructing any driveways and roadway approaches to tie into the proposed roadway profile, as necessary.
- Replacing any existing curb ramps that do not meet current Americans with Disabilities (ADA) standards.

Refer to the table below for a list of all curb ramps within the project area and refer to the preliminary design plan sheets in Appendix B, pages B-29 to B-65.

Intersection	Quadrant	Number of Curb Ramps
SR 18 and North Clawil Street	Northeast (NE), northwest (NW), and southeast (SE) corners	3
SR 18 and North Ripley Street	SE and southwest (SW) corners	2
SR 18 and SR 43 (north junction)	NW and SW corners	2
SR 43 and West 1 st Street	All four corners	6
SR 43 and West 2 nd Street	All four corners	8
SR 43 and West 3 rd Street (south junction)	All four corners	5
SR 43 and West 4 th Street	All four corners	8
SR 43 and West 5 th Street	All four corners	5

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SR 43 and West 6 th Street	All four corners	4
SR 43 and West 7 th Street	All four corners	5
SR 43 and West 8 th Street	NW and SW corners	2
SR 43 and West 9 th Street	NW and SW corners	2
SR 43 and South Ripley Street / West 10 th Street	NW and SW corners	2
Total		54

The preferred alternative is expected to satisfy the purpose and need of the project by improving the pavement condition to an IRI of less than or equal to 95 and enhancing drainage along SR 18 and SR 43 from 0.12 mile west of SR 43 (North Clawil Street) to 0.57 mile south of SR 18 (just north of Moots Creek bridge). The bridge crossing Moot Creek will not be impacted.

Maintenance of Traffic (MOT)

The vehicular MOT will use a full road closure and official detour route. The pedestrian MOT will use a detour. Refer to the *Maintenance of Traffic (MOT) During Construction* section of this Categorical Exclusion (CE) document for more details.

Impact Summary

Approximately 0.90 acre of permanent right-of-way, 0.15 acre of temporary right-of-way, and the reacquisition of 0.30 acre of apparent existing right-of-way will be needed. Approximately 0.30 acre of tree clearing / trimming will be needed for construction activities. Impacts to streams or wetlands will not occur. Utility relocations will be required. Various locations of fiber optic lines, gas lines, and water lines will be relocated to avoid the proposed storm sewer inlet structures and pipes. If any utility relocations result in any other environmental impacts that are not assessed in this environmental document, an Additional Information (AI) document will be needed. This is a firm commitment in the *Environmental Commitments* section of this CE document.

Logical Termini and Independent Utility

The termini for this project are based on the amount and depth of road deterioration, which is a result of drainage concerns and earlier work history. The northwest and southern project termini are logical because they are entirely within Brookston limits. The northwest and southern project termini are also logical because the pavement located west and south of the project area does not exhibit the same pavement deficiencies. The project is an independent and complete project because it is not dependent on any other projects to meet its purpose and need.

OTHER ALTERNATIVES CONSIDERED:

Provide a header for each alternative. Describe all discarded alternatives, including the No Build Alternative. Explain why each discarded alternative was not selected. Make sure to state how each alternative meets or does not meet the Purpose and Need and why.

No Build Alternative

This alternative would not involve any improvements to the existing roadway. This alternative would not require additional permanent right-of-way, not involve any cost, and would not result in impacts to the surrounding environment. This alternative would not address the primary purpose of improving the condition of the existing pavement and enhancing drainage. As such, this alternative was dismissed from further consideration because it would not address the purpose and need of the project.

The No Build Alternative is not feasible, prudent, or practicable because (Mark all that apply):

- It would not correct existing capacity deficiencies;
- It would not correct existing safety hazards;
- It would not correct the existing roadway geometric deficiencies;
- It would not correct existing deteriorated conditions and maintenance problems; or
- It would result in serious impacts to the motoring public and general welfare of the economy.
- Other (describe): N/A

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ROADWAY CHARACTER:

If the proposed action includes multiple roadways, complete and duplicate for each roadway.

Name of Roadway SR 18
 Functional Classification: Major Collector Roadway
 Current ADT: 1,861 VPD (2025) Design Year ADT: 1,861 VPD (2045)
 Design Hour Volume (DHV): 185 Truck Percentage (%) 9.2
 Designed Speed (mph): 35 Legal Speed (mph): 35

	Existing		Proposed	
Number of Lanes:	2		2	
Type of Lanes:	Travel		Travel	
Pavement Width:	24	ft.	24	ft.
Shoulder Width:	0-8	ft.	0-8	ft.
Median Width:	0	ft.	0	ft.
Sidewalk Width:	5-10	ft.	5-10	ft.

Setting: Urban Suburban Rural
 Topography: Level Rolling Hilly

Name of Roadway SR 43
 Functional Classification: Principal Arterial Roadway
 Current ADT: 7,329 VPD (2025) Design Year ADT: 7,433 VPD (2045)
 Design Hour Volume (DHV): 788 Truck Percentage (%) 5.8
 Designed Speed (mph): 30 Legal Speed (mph): 30-35

	Existing		Proposed	
Number of Lanes:	2		2	
Type of Lanes:	Travel		Travel	
Pavement Width:	20-30	ft.	20-30	ft.
Shoulder Width:	0-8	ft.	0-8	ft.
Median Width:	0	ft.	0	ft.
Sidewalk Width:	5	ft.	5	ft.

Setting: Urban Suburban Rural
 Topography: Level Rolling Hilly

BRIDGES AND/OR SMALL STRUCTURE(S):

If the proposed action includes multiple structures, complete and duplicate for each bridge and/or small structure. Include both existing and proposed bridge(s) and/or small structure(s) in this section.

Structure/NBI Number(s): Not applicable (N/A) Sufficiency Rating: N/A
 (Rating, Source of Information)

	Existing		Proposed	
Bridge/Structure Type:	N/A		N/A	
Number of Spans:	N/A		N/A	
Weight Restrictions:	N/A	ton	N/A	ton
Height Restrictions:	N/A	ft.	N/A	ft.
Curb to Curb Width:	N/A	ft.	N/A	ft.
Outside to Outside Width:	N/A	ft.	N/A	ft.
Shoulder Width:	N/A	ft.	N/A	ft.

Describe impacts and work involving bridge(s), culvert(s), pipe(s), and small structure(s). Provide details for small structure(s): structure number, type, size (length and dia.), location and impacts to water. Use a table if the number of small structures becomes

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large. If the table exceeds a complete page, put it in the appendix and summarize the information below with a citation to the table.

The bridge crossing Moot Creek is adjacent to the project area and will not be impacted. One driveway pipe is located within the southern project area. The 18-inch diameter CMP will be replaced in kind. The CMP does not exhibit any historical characteristics. Refer to the *Cultural Resources* section of this CE document for more details.

The project will include the replacement of inlet curb drains and installation of a new storm sewer trunk line. Because the storm sewer will be enclosed, it would not allow bats or birds to inhabit them. As such, inspection of these structures did not occur.

MAINTENANCE OF TRAFFIC (MOT) DURING CONSTRUCTION:

	Yes	No
Is a temporary bridge proposed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is a temporary roadway proposed?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Will the project involve the use of a detour or require a ramp closure? (Describe below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provisions will be made for access by local traffic and so posted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provisions will be made for through-traffic dependent businesses.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provisions will be made to accommodate any local special events or festivals.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Will the proposed MOT substantially change the environmental consequences of the action?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there substantial controversy associated with the proposed method for MOT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Will the project require a sidewalk, curb ramp, and/or bicycle lane closure? (Describe below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provisions will be made for access by pedestrians and/or bicyclist and so posted (describe below).	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discuss closures, detours, and/or facilities (if any) that will be provided for maintenance of traffic. Any known impacts from these temporary measures should be quantified to the extent possible, particularly with respect to properties such as Section 4(f) resources and wetlands. Discuss any pedestrian/bicycle closures. Any local concerns about access and traffic flow should be detailed as well.

Vehicular MOT

The vehicular MOT will maintain traffic offsite using a full road closure and detour route. The road closure will occur in two phases.

Phase 1

Phase 1 will fully close SR 43 from the Moots Creek Bridge to the south junction of SR 18 (West 3rd Street). The detour will use Interstate (I)-65, SR 18, SR 43, U.S. Highway (US) 421, and US 24. The detour will be approximately 42.4 miles long and add approximately 41.8 miles for motorists (compared to the straight-line distance of 0.60 mile from the Moots Creek bridge to the south junction of SR 18). Refer to plan sheets detailing the vehicular MOT in Appendix B, page B-38.

Phase 2

Phase 2 will partially close SR 18 and SR 43 from the south junction of SR 18 (West 3rd Street) to North Clawil Street. The detour will use I-65, SR 43, SR 18, US 421, and US 24. The detour will be approximately 41.2 miles long and add approximately 40.9 miles for motorists (compared to the straight-line distance of 0.30 mile from the south junction of SR 18 to North Clawil Street). Refer to plan sheets detailing the vehicular MOT in Appendix B, page B-39.

Local detours may be used for local traffic. Local detours could use West County Road (CR) 1150 South, South CR 100 West, SR 18, SR 43, East CR 900 South, and South CR 75 East (Phase 1) or South CR 100 West, West CR 1050 South, SR 18, South CR 75 East, and East CR 900 South (Phase 2). Any local detours will be determined later and implemented by Brookston or White County.

Pedestrian MOT

Pedestrians will be detoured to the adjacent side street to avoid the intersection under construction where sidewalks currently exist. Temporary curb ramps and crosswalks will be provided to detour pedestrians around each intersection while under construction. Signage indicating the sidewalk is closed and showing locations where pedestrians can cross will be placed during construction. Refer to plan sheets detailing the pedestrian MOT in Appendix B, pages B-41 to B-44.

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The closures / lane restrictions will pose a temporary inconvenience to traveling motorists (including school buses and emergency services); however, no significant delays are anticipated, and all inconveniences and delays will cease upon project completion.

ESTIMATED PROJECT COST AND SCHEDULE:

Engineering: \$ 819,250 (2023) Right-of-Way: \$ 200,000 (2023) Construction: \$ 5,386,397 (2025)

Anticipated Start Date of Construction: Fall of 2024

RIGHT OF WAY:

Land Use Impacts	Amount (acres)		
	Permanent	Temporary	Reacquired
Residential	0.57	0.14	0
Commercial	0.01	0.01	0
Agricultural	0	0	0
Forest	0	0	0
Wetlands	0	0	0
Other: existing roadway pavement	0	0	0.30
Other: school	0.32	0	0
Total	0.90	0.15	0.30

Describe both Permanent and Temporary right-of-way and describe their current use. Typical and Maximum right-of-way widths (existing and proposed) should also be discussed. Any advance acquisition, reacquisition, or easements, either known or suspected, and their impacts on the environmental analysis should be discussed.

The existing right-of-way width along both sides of SR 18 varies from the edge of pavement to the back of sidewalks and widens at the intersection with SR 43 to support wider turning movements. The proposed right-of-way width along SR 18 will generally be the same.

The existing right-of-way width along both sides of SR 43 varies from the edge of pavement to the back of sidewalks and widens at the intersection with West 7th Street to support wider turning movements. The proposed right-of-way width along SR 43 will generally be the same.

Approximately 0.90 acre of permanent right-of-way, 0.15 acre of temporary right-of-way, and the reacquisition of 0.30 acre of apparent existing right-of-way will be needed (Appendix B, pages B-3 to B-6). The 0.90 acre of permanent right-of-way will be needed for replacing the pavement and associated work components and installing the storm sewer. Approximately 0.58 acre of permanent right-of-way will be taken from residential and commercial land which consists of transportation use (sidewalks, curb ramps) and maintained lawn. Additionally, 0.32 acre of permanent right-of-way will be taken from the Frontier Elementary School which consists of maintained lawn. The 0.15 acre of temporary right-of-way will be needed for grading and reconstructing driveways. The temporary right-of-way will be taken from residential and commercial land which consists of transportation use (sidewalks, curb ramps) and maintained lawn. The reacquisition of 0.30 acre of apparent existing right-of-way will be needed to properly deed portions of the roadway and will be taken from the centerline to back of curb (i.e., existing transportation use).

Note: The early coordination letter stated that 1.25 acres of permanent right-of-way would be needed (Appendix C, pages C-1 to C-3). However, after the project design was refined, it was determined less permanent right-of-way was needed and that reacquisition of apparent existing right-of-way would be required.

If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division (ESD) and the INDOT District Environmental Section will be contacted immediately.

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Part III – Identification and Evaluation of Impacts of the Proposed Action

SECTION A - EARLY COORDINATION:

List the date(s) coordination was sent and all resource agencies that were contacted as a part of the development of this Environmental Study. Also, include the date of their response or indicate that no response was received.

Early coordination letters were mailed on June 9, 2022 (Appendix C, pages C-1 to C-3). Refer to an example early coordination letter in Appendix C, pages C-1 to C-3. Refer to the table below for which agencies responded to the early coordination letter.

Agencies	Date(s) Sent	Date(s) Response Received	Appendix C Page(s)
INDOT Crawfordsville District	June 9, 2022	N/A	N/A
FHWA	June 9, 2022	N/A	N/A
Natural Resources Conservation (NRCS)	June 9, 2022	June 13, 2022	C-7 and C-8
Indiana Geological and Water Survey (IGWS)	June 9, 2022	June 9, 2022	C-4 to C-6
Indiana Department of Natural Resources (IDNR) Division of Fish and Wildlife (DFW)	June 9, 2022	July 8, 2022	C-9 to C-11
U.S. Army Corps of Engineers (USACE) Chicago Regional Office	June 9, 2022	N/A	N/A
Local Floodplain Administrator	June 9, 2022	June 10, 2022 (refer to the White County Area Plan Commission response)	C-12 to C-14
U.S. Department of Housing and Urban Development (USHUD)	June 9, 2022	N/A	N/A
National Park Service (NPS) Midwest Regional Region	June 9, 2022	N/A	N/A
White County Board of Commissioners	June 9, 2022	N/A	N/A
White County Surveyor	June 9, 2022	N/A	N/A
White County Council Members	June 9, 2022	N/A	N/A
White County Highway Department	June 9, 2022	N/A	N/A
White County Area Plan Commission	June 9, 2022	June 10, 2022	C-12 to C-14
Indiana Department of Environmental Management (IDEM) Ground Water Section	June 9, 2022	June 16, 2022	C-15 to C-17
Frontier School Corporation	June 9, 2022	N/A	N/A
Brookston Water / Sewer and Road Department	June 9, 2022	N/A	N/A
White County Soil and Water Conservation District	June 9, 2022	June 14, 2022	C-18 and C-19
Town of Brookston Council	June 9, 2022	N/A	N/A
Brookston Church of Christ	June 9, 2022	N/A	N/A
Shultz / Private Airport	June 9, 2022	N/A	N/A

Early coordination was not conducted with the U.S. Fish and Wildlife Service (USFWS) because the project qualifies under the 2013 Interim Policy.

In their early coordination response, the White County Area Plan Commission said they reviewed the documents and did not note any concerns since there will not be any changes to property lines or to the use of abutting properties. The letter further stated if permanent right-of-way is needed, those expanded elements would be subject to their administrative process and approval. In a response dated November 22, 2022, RQAW stated right-of-way acquisition will be conducted per all federal and state requirements and a copy of the right-of-way plans will be provided to the White County Area Plan Commission. All applicable recommendations are included in the *Environmental Commitments* section of this CE document.

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SECTION B – ECOLOGICAL RESOURCES:

Streams, Rivers, Watercourses & Other Jurisdictional Features

- Federal Wild and Scenic Rivers
- State Natural, Scenic or Recreational Rivers
- Nationwide Rivers Inventory (NRI) listed
- Outstanding Rivers List for Indiana
- Navigable Waterways

Presence

✓

Impacts

Yes	No
	✓

Total stream(s) in project area: N/A Linear feet Total impacted stream(s): N/A Linear feet

Describe all streams, rivers, watercourses, and other jurisdictional features adjacent or within the project area. Include whether impacts (both permanent and temporary) will occur to the features identified. Include if the streams or rivers are listed on any federal or state lists for Indiana. Include if features are likely subject to federal or state jurisdiction. Discuss measures to avoid, minimize, and mitigate if impacts will occur.

Based on a desktop review, aerial maps of the project area (Appendix B, pages B-3 to B-6), and the Red Flag Investigation (RFI) report (Appendix E, pages E-4 and E-11), there are 11 streams, rivers, or other jurisdictional features mapped within the 0.50-mile search radius. There is one stream mapped adjacent to the project area. One stream, Moots Creek, was identified adjacent to the project area by the site visit on April 11, 2022, by RQAW.

Moots Creek is not listed as a Federal Wild and Scenic River or on the National Rivers Inventory and is not listed as a State Natural, Scenic and Recreational River or as an Outstanding River for Indiana.

Waters of the U.S. Report

A *Waters of the U.S. Determination Report* was not prepared for this project. Coordination with the INDOT Ecology and Waterway Permitting Office (EWPO) on April 26, 2022, determined a *Waters of the U.S. Determination Report* is not needed since there are no water resources within the project area and because the project will not impact any water resources (Appendix F, pages F-1 and F-2). The USACE makes all final determinations regarding jurisdiction.

Impacts

There will not be any direct impacts to Moots Creek since there will not be any work below the ordinary high water mark (OHWM) of Moots Creek. There will not be any indirect impacts to Moots Creek since sediment and erosion control measures will be implemented during construction. Refer to the map showing construction limits in relation to Moots Creek in Appendix B, page B-5.

Early Coordination

In their early coordination response, the IDNR Division of Fish and Wildlife provided recommendations such as implementing erosion and sediment control measures and stream bank stabilization measures, minimizing in-channel disturbance, time restrictions for working within the waterway, ensuring Best Management Practices (BMPs) are implemented to limit the migration of polycyclic aromatic hydrocarbons (PAHs) into waterways, and proper use of / placement of riprap. See the complete list of IDNR Division of Fish and Wildlife recommendations in Appendix C, pages C-9 to C-11. All applicable recommendations are included in the *Environmental Commitments* section of this CE document.

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Open Water Feature(s)	Presence	Impacts	
		Yes	No
Reservoirs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lakes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Farm Ponds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Retention/Detention Basin	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Storm Water Management Facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other: <u>N/A</u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Describe all open water feature(s) identified adjacent or within the project area. Include whether impacts (both permanent and temporary) will occur to the features identified. Include if features are likely subject to federal or state jurisdiction. Discuss measures to avoid, minimize, and mitigate if impacts will occur.

Based on a desktop review, aerial maps of the project area (Appendix B, pages B-3 to B-6), and the RFI report (Appendix E, pages E-4 and E-11), there are two open water features (lakes) mapped within the 0.50-mile search radius. There are no open water features mapped within or adjacent to the project area. No open water features were identified by the site visit on April 11, 2022, by RQAW. Impacts are not expected.

Waters of the U.S. Report

A *Waters of the U.S. Determination Report* was not prepared for this project. Coordination with the INDOT EWPO on April 26, 2022, determined a *Waters of the U.S. Determination Report* is not needed since there are no water features within the project area and because the project will not impact any water resources (Appendix F, pages F-1 and F-2). The USACE makes all final determinations regarding jurisdiction.

Early Coordination

In their early coordination response, the IDNR Division of Fish and Wildlife recommended different approaches to stormwater management, such as retention basins, constructed wetlands, rain gardens, infiltration basins or trenches, and pervious pavement (Appendix C, pages C-9 to C-11). All applicable agency recommendations are included in the *Environmental Commitments* section of this CE document.

Wetlands	Presence	Impacts	
		Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Total wetland area: N/A Acre(s) Total wetland area impacted: N/A Acre(s)

(If a determination has not been made for non-isolated/isolated wetlands, fill in the total wetland area impacted above.)

Wetlands (Mark all that apply)	Documentation	ESD Approval Dates
	Wetland Determination	<input type="checkbox"/>
Wetland Delineation	<input type="checkbox"/>	<input type="checkbox"/>
USACE Isolated Waters Determination	<input type="checkbox"/>	<input type="checkbox"/>

Improvements that will not result in any wetland impacts are not practical because such avoidance would result in (Mark all that apply and explain):

- Substantial adverse impacts to adjacent homes, business, or other improved properties;
- Substantially increased project costs;
- Unique engineering, traffic, maintenance, or safety problems;
- Substantial adverse social, economic, or environmental impacts, or
- The project not meeting the identified needs.

Describe all wetlands identified adjacent or within the project area. Include whether impacts (both permanent and temporary) will occur to the features identified. Include if features are likely subject to federal or state jurisdiction. Discuss measures to avoid, minimize, and mitigate if impacts will occur.

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Based on a desktop review, aerial maps of the project area (Appendix B, pages B-3 to B-6), and the RFI report (Appendix E, pages E-4 and E-11) there are 17 wetlands mapped within 0.50-mile search radius. There are no wetlands mapped within or adjacent to the project area. No wetlands were identified during the site visit on April 11, 2022, by RQAW. Impacts are not expected.

Waters of the U.S. Report

A *Waters of the U.S. Determination Report* was not prepared for this project. Coordination with the INDOT EWPO on April 26, 2022, determined a *Waters of the U.S. Determination Report* is not needed since there are no water features within the project area and because the project will not impact any water resources (Appendix F, pages F-1 and F-2). The USACE makes all final determinations regarding jurisdiction.

Early Coordination

Responses pertaining to wetlands were not received.

	<u>Presence</u>	<u>Impacts</u>	
<u>Terrestrial Habitat</u>	<input checked="" type="checkbox"/>	Yes	No
Total terrestrial habitat in project area: <u>3.20</u> Acre(s)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Total tree clearing: <u>0.30</u> Acre(s)		<input type="checkbox"/>	<input type="checkbox"/>

Describe types of terrestrial habitat (i.e., forested, grassland, farmland, lawn, etc.) adjacent or within the project area. Include whether impacts will occur to habitat identified. Include total terrestrial habitat impacted and total tree clearing that will occur. Discuss measures to avoid, minimize, and mitigate if impacts will occur.

Based on a desktop review, site visit on April 11, 2022, by RQAW, and aerial maps of the project area (Appendix B, pages B-3 to B-6), terrestrial habitat is present. Terrestrial habitat primarily consists of maintained commercial and residential lawns. There is a portion of forested / floodway habitat within the southern project area. Dominant vegetation consists of annual blue grass (*Poa annua*), common milkweed (*Asclepias syriaca*), black walnut (*Juglans nigra*), and red mulberry (*Morus rubra*).

Impacts

There will be direct impacts to terrestrial habitat. Approximately 0.30 acre of trees will be cleared during the inactive bat season (October 1 through March 31) for roadside grading activities, curb ramp replacements, and installation of curb and gutter. Additionally, any tree branches that overhang the roadway will be trimmed. Mitigation for terrestrial habitat impacts is not expected since impacts will not exceed one acre of floodway habitat, and because there are no unique, prime, or high-quality habitats known to exist within the project area. Avoidance and minimization measures include limiting the disturbance and construction limit boundaries to the maximum extent practical and keeping tree removal / trimming to a minimum while still meeting the purpose and need of the project.

Early Coordination

In their early coordination response, the IDNR Division of Fish and Wildlife recommended revegetating disturbed areas, tree clearing restrictions, and planting trees for trees that are removed (Appendix C, pages C-9 to C-11). All applicable agency recommendations are included in the *Environmental Commitments* section of this CE document.

Protected Species

Federally Listed Bats

	Yes	No
Information for Planning and Consultation (IPaC) determination key completed	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Section 7 informal consultation completed (IPaC cannot be completed)	<input type="checkbox"/>	<input type="checkbox"/>
Section 7 formal consultation Biological Assessment (BA) required	<input type="checkbox"/>	<input type="checkbox"/>

Determination Received for Listed Bats from USFWS: NE NLAA LAA

Other Species not included in IPaC

	Yes	No
Additional federal species found in project area (based on IPaC species list)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State species (not bird) found in project area (based upon consultation with IDNR)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Migratory Birds

Known usage or presence of birds (i.e., nests)
 State bird species based upon coordination with IDNR

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discuss IDNR coordination and species identified. Describe USFWS Section 7 consultation and determination received for Indiana bat and northern long-eared bat impacts. Discuss if other federally listed species were identified. If so, include consultation that has occurred and the determination that was received. Discuss if migratory birds have been observed and any impacts.

Based on a desktop review and the RFI report completed by RQAW on June 14, 2022, the IDNR White County Endangered, Threatened and Rare (ETR) Species List has been checked (Appendix E, pages E-1 to E-12). In their early coordination response, the IDNR Division of Fish and Wildlife said the Natural Heritage Program's Database has been checked and the state endangered upland sandpiper (*Bartramia longicauda*) and black-crowned night-heron (*Nycticorax nycticorax*) have been documented within 0.50 mile of the project area. However, the IDNR Division of Fish and Wildlife said they do not foresee any impacts to these bird species because of the project (Appendix C, pages C-9 to C-11). A review of the USFWS database by the INDOT Crawfordsville District on August 2, 2022, did not indicate the presence of bats, in or within, 0.50 mile of the project area.

Indiana Bat and Northern Long-eared Bat

Project information was submitted through the USFWS's Information for Planning and Consultation (IPaC) portal, and an official species list was generated (Appendix C, pages C-20 to C-35). The project is within range of the federally endangered Indiana bat (*Myotis sodalis*) and northern long-eared bat (NLEB) (*Myotis septentrionalis*). The official species list also identified the monarch butterfly (*Danaus plexippus*) as a candidate species for listing, the tricolored bat (*Perimyotis subflavus*) as a proposed endangered species, and the whooping crane (*Grus americana*) as an experimental population. As candidate, proposed, and experimental species, the monarch butterfly, tricolored bat, and whooping crane are not given any statutory protection under the Endangered Species Act. Therefore, no further coordination is needed with the USFWS.

The project qualifies for the *Range-wide Programmatic Informal Consultation for the Indiana bat and northern long eared bat (NLEB)*, dated May 2016 (revised February 2018), between FHWA, Federal Railroad Administration (FRA), Federal Transit Administration (FTA), and USFWS. Structure inspections of any small structure (driveway pipe, etc.) occurred on April 11, 2022, by RQAW. No signs of bats or birds were observed. The bridge over Moots Creek was not inspected since it is outside the project area. USFWS Bridge / Structure Assessments are only valid for two years. If construction begins after April 11, 2024, an inspection of structures by a qualified individual, must be performed. Inspection of structures should check for presence of bats / bat indicators and / or presence of birds. The results of the inspection must indicate no signs of bats or birds. If signs of bats or birds are documented during this inspection, the INDOT Crawfordsville District Environmental Manager must be contacted immediately.

An effect determination key was completed on August 2, 2022, and based on the responses provided, the project was found to *May Affect, Not Likely to Adversely Affect* the Indiana bat and northern long-eared bat (Appendix C, pages C-36 to C-48). The INDOT Crawfordsville District reviewed and verified the effect finding and requested USFWS's review of the finding on August 2, 2022. No response was received from USFWS within the 14-day review period; therefore, it was concluded they concur with the finding. Avoidance and Minimization Measures (AMMs) are included as firm commitments in the *Environmental Commitments* section of this CE document. AMMs pertain to lighting restrictions, tree removal restrictions, and workers' awareness of AMMs.

This precludes the need for further consultation on this project as required under Section 7 of the Endangered Species Act, as amended. If new information on endangered species at the site becomes available, or if project plans are changed, USFWS will be contacted for consultation.

Geological and Mineral Resources

Project located within the Indiana Karst Region
 Karst features identified within or adjacent to the project area
 Oil/gas or exploration/abandoned wells identified in the project area

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Date Karst Evaluation reviewed by INDOT EWPO (if applicable): N/A

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Discuss if the project is in the Indiana Karst Region and if any karst features have been identified in the project area (from RFI). Discuss response received from IGWS coordination. Discuss if any mines, oil/gas, or exploration/abandoned wells were identified and if impacts will occur. Include discussion of karst study/report was completed and results. (Karst investigation must comply with the current Protection of Karst Features during Planning and Construction guidance and coordinated and reviewed by INDOT EWPO)

Based on a desktop review and the Indiana Karst Region map, the project is located outside the designated Indiana Karst Region as outlined in the most current *Protection of Karst Features during Project Development and Construction*. According to the topographic map of the project area (Appendix B, page B-2) and the RFI report (Appendix E, pages E-4 and E-11), there are no karst features identified within or adjacent to the project area.

Early Coordination

In their early coordination response, the IGWS did not indicate that karst features exist within the project area (Appendix C, pages C-4 to C-6). However, the IGWS did say the project is located within an area of high liquefaction potential, 1 percent chance annual flood hazard, moderate potential for encountering bedrock resources, low potential for encountering sand and gravel resources, and no documented active / abandoned mineral resources extraction sites. The response from IGWS was communicated with the designer on June 9, 2022. Impacts are not expected.

SECTION C – OTHER RESOURCES

	<u>Presence</u>	<u>Impacts</u>	
		<u>Yes</u>	<u>No</u>
Drinking Water Resources			
Wellhead Protection Area(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Source Water Protection Area(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water Well(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urbanized Area Boundary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Water System(s)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is the project located in the St. Joseph Sole Source Aquifer (SSA):		<u>Yes</u>	<u>No</u>
If yes, is the FHWA/EPA SSA MOU Applicable?		<input type="checkbox"/>	<input checked="" type="checkbox"/>
If yes, is a Groundwater Assessment Required?		<input type="checkbox"/>	<input type="checkbox"/>

Check the appropriate boxes and discuss each topic below. Provide details about impacts and summarize resource-specific coordination responses and any mitigation commitments. Reference responses in the Appendix.

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Sole Source Aquifer (SSA)

The project is in White County, which is not located within the area of the Saint Joseph SSA, the only legally designated SSA in Indiana. Therefore, the FHWA / Environmental Protection Agency (EPA) SSA Memorandum of Understanding (MOU) is not applicable, and a detailed groundwater assessment is not needed. Impacts are not expected.

Wellhead Protection Area (WHPA) and Source Water Area (SWA)

The IDEM Wellhead Proximity Determinator website (<http://www.in.gov/idem/cleanwater/pages/wellhead/>) was accessed on June 9, 2022, by RQAW. The project is located within a WHPA but is not located within a SWA.

Early Coordination

In their early coordination response, IDEM stated the project is within the Brookston Water Department WHPA (Appendix C, pages C-15 to C-17). The Brookston Water Department did not respond to the early coordination letter. However, impacts to the WHPA are not expected since all project activities will be conducted in accordance with an IDEM Construction Stormwater General Permit (CSGP).

Water Wells

The IDNR Water Well Record Database website (<https://www.in.gov/dnr/water/3595.htm>) was accessed on June 9, 2022, by RQAW. No water wells are located near the project area. Impacts are not expected.

Urban Area Boundary (UAB)

Based on a desktop review of the INDOT Municipal Separate Storm Sewer System (MS4) website (<https://entapps.indot.in.gov/MS4/>) on June 9, 2022, by RQAW, the project is not located within a UAB. Impacts are not expected.

Public Water System

Based on a desktop review, site visit on April 11, 2022, by RQAW, aerial maps of the project area (Appendix B, pages B-3 to B-6), and the preliminary project plan sheets, the project is located where there is a public water system. The Brookston Water Department has existing water distribution facilities within the project area. The Brookston Water Department did not respond to the early coordination letter. Temporary impacts to the public water system are expected due to the installation of a new storm sewer system.

Floodplains	Presence	Impacts	
		Yes	No
Project located within a regulated floodplain	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Longitudinal encroachment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transverse encroachment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Homes located in floodplain within 1000' up/downstream from project	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If applicable, indicate the Floodplain Level?

Level 1 Level 2 Level 3 Level 4 Level 5

Use the IDNR Floodway Information Portal to help determine potential impacts. Include floodplain map in appendix. Discuss impacts according to the classification system. If encroachment on a flood plain occurs, coordinate with the Local Flood Plain Administrator during design to insure consistency with the local flood plain planning.

Based on a desktop review of the IDNR Indiana Floodway Information Portal website ([Indiana Floodplain Information Portal 2.0](#)) by RQAW, on June 9, 2022, and the RFI report (Appendix E, pages E-4 and E-11), the project is located within a regulatory floodplain as determined from approved IDNR floodplain maps (Appendix F, page F-3).

The project qualifies as a Category 4 per the current INDOT CE Manual, which states, *no homes are located within the base floodplain within 1,000 feet upstream and no homes are located within the base floodplain within 1,000 feet downstream. The proposed structure will have an effective capacity such that backwater surface elevations are not expected to substantially increase. As a result, there will be no substantial adverse impacts on natural and beneficial floodplain values; there will be no substantial change in flood risks; and there will be no substantial increase in potential*

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for interruption or termination of emergency service or emergency evacuation routes; therefore, it has been determined that this encroachment is not substantial. A hydraulic design study that addresses various structure size alternatives will be completed during the preliminary design phase. A summary of this study will be included with the Field Check Plans.

Early Coordination

In their early coordination response, the White County Area Plan Commission noted they are responding on behalf of the local floodplain administrator. The letter further stated it is understood the project is exempt from the requirement to obtain a Local Floodplain Improvement Permit, even though a small portion of the project area crosses a flood hazard area (Appendix C, page C-12).

In their early coordination response, the IDNR Division of Fish and Wildlife said the project may require the formal approval for construction in a floodway unless it qualifies under the INDOT and IDNR MOU for Maintenance Activity Exemption, dated March 1997. Refer to the *Permits* section of this CE document for more details.

Farmland	Presence	Impacts	
		Yes	No
Agricultural Lands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prime Farmland (per NRCS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Points (from Section VII of CPA-106/AD-1006*)	<u>N/A</u>		

**If 160 or greater, see CE Manual for guidance.*

Discuss existing farmland resources in the project area, impacts that will occur to farmland, and mitigation and minimization measures considered.

Based on a desktop review, site visit on April 11, 2022, by RQAW, and aerial maps of the project area (Appendix B, pages B-3 to B-6), there is no land that meets the definition of farmland under the Farmland Protection Policy Act (FPPA) within or adjacent to the project area. The requirements of the FPPA do not apply to this project. Impacts are not expected.

Early Coordination

In their early coordination response, the NRCS stated the project will not cause a conversion of prime farmland (Appendix C, page C-7).

SECTION D – CULTURAL RESOURCES

	Category(ies) and Type(s)	INDOT Approval Date(s)	N/A
Minor Projects PA	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Full 106 Effect Finding			
No Historic Properties Affected	<input type="checkbox"/>	No Adverse Effect	<input checked="" type="checkbox"/>
		Adverse Effect	<input type="checkbox"/>
Eligible and/or Listed Resources Present			
NRHP Building/Site/District(s)	<input checked="" type="checkbox"/>	Archaeology	<input type="checkbox"/>
		NRHP Bridge(s)	<input type="checkbox"/>

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Documentation Prepared (mark all that apply)

APE, Eligibility and Effect Determination	<input type="checkbox"/>
800.11 Documentation	<input type="checkbox"/>
Historic Properties Report or Short Report	<input type="checkbox"/>
Archaeological Records Check and Assessment	<input type="checkbox"/>
Archaeological Phase Ia Survey Report	<input type="checkbox"/>
Archaeological Phase Ic Survey Report	<input type="checkbox"/>
Other: Early Coordination	<input type="checkbox"/>

ESD Approval Date(s)

July 5, 2023
July 5, 2023
July 5, 2023

SHPO Approval Date(s)

August 4, 2023
August 4, 2023
August 4, 2023

MOA Signature Dates (List all signatories)

Memorandum of Agreement (MOA)

N/A

If the project falls under the MPPA, describe the category(ies) that the project falls under and any approval dates. If the project requires full Section 106, use the headings provided. The completion of the Section 106 process requires that a Legal Notice be published in local newspapers. Please indicate the publication date, name of the paper(s) and the comment period deadline. Include any further Section 106 work which must be completed later, such as mitigation from a MOA or avoidance commitments.

Area of Potential Effect (APE)

The APE is the area in which the proposed project may cause alterations in the character or use of historic resources. The above-ground APE is an irregular polygon that extends approximately 110 to 180 feet from the roadway centerline, approximately one property from the project area (Appendix D, pages D-26 and D-27).

In a letter dated August 4, 2023, the Indiana SHPO concurred with the APE (Appendix D, pages D-43 and D-44).

Early Coordination

Early coordination was initiated with potential consulting parties on July 6, 2023, by RQAW and INDOT Cultural Resources Office (CRO). Early coordination was mailed or e-mailed and invited agencies, individuals, or Tribes to be consulting parties. [Note: The Indiana State Historic Preservation Officer (SHPO) is an automatic consulting party. The FHWA is the federal agency undertaking the project with INDOT acting on behalf of the FHWA].

Refer to an example of the early coordination in Appendix D, pages D-34 to D-38. Refer to the table below for which agencies, individuals, or Tribes responded to the early coordination letter.

Agency / Individual / Tribe	Date(s) Sent	Date Response(s) Received	Appendix D Page(s)
Indiana Landmarks	July 6, 2023	N/A	N/A
Northwest Regional Office			
Town of Brookston	July 6, 2023	N/A	N/A
White County Historian / White County Historical Society / White County Historical Museum	July 6, 2023	N/A	N/A
White County Commissioners	July 6, 2023	N/A	N/A
House at 105 North Ripley Street Property Owner	July 6, 2023	N/A	N/A
James F. French House at 112 West 2 nd Street Property Owner	July 6, 2023	N/A	N/A
William French House at 111 South Prairie Street Property Owner	July 6, 2023	N/A	N/A
Murphy House at 305 South Prairie Street Property Owner	July 6, 2023	N/A	N/A
Brookston Public Library	July 6, 2023	N/A	N/A
Brookston Unitarian Universalist Church	July 6, 2023	N/A	N/A
Brookston Knights of Pythias Lodge Property Owners	July 6, 2023	N/A	N/A
Absentee Shawnee Tribe of Oklahoma	July 6, 2023	N/A	N/A
Eastern Shawnee Tribe of Oklahoma	July 6, 2023	N/A	N/A
Miami Tribe of Oklahoma	July 6, 2023	N/A	N/A

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Peoria Tribe of Indians of Oklahoma	July 6, 2023	N/A	N/A
Pokagon Band of Potawatomi Indians	July 6, 2023	N/A	N/A
Shawnee Tribe	July 6, 2023	N/A	N/A

In a letter dated August 4, 2023, the Indiana SHPO stated they are not aware of any other parties who should be invited to participate in the Section 106 consultation process (Appendix D, pages D-43 and D-44).

Archaeology

The APE was investigated for the presence of archaeological resources by qualified professionals from Cultural Resource Analysts (CRA) on February 27, 2023. Based on the documentary research, the archaeologists recommended the project proceed without additional archaeological study (Appendix D, pages D-39 and D-40).

In a letter dated August 4, 2023, the Indiana SHPO did not identify any currently known archeological resources listed in or eligible for listing in the National Register of Historic Places (NRHP) (Appendix D, pages D-43 and D-44).

Historic Properties

The APE was investigated for the presence of historic properties and / or structures by qualified professionals from RQAW on April 11, 2022, and January 19, 2023. Based on the site visits and associated documentary research, the historians recommended eight resources eligible for the NRHP.

Brookston Commercial Historic District (IHSSI Number 181-070-56001-56026) (Appendix B, pages B-3 and B-4). The historic district is located around the SR 43 / West 3rd Street Intersection and is recommended eligible for the NRHP under Criteria A and C.

House at 105 North Ripley Street (IHSSI Number 181-070-58004) (Appendix B, page B-3). The house is in the southwest quadrant of the SR 43 / Ripley Street Intersection and is recommended eligible for the NRHP under Criterion C.

James F. French House (IHSSI Number 181-070-58008) (Appendix B, page B-3). The house is in the northeast quadrant of the SR 43 / West 1st Street Intersection and is recommended eligible for the NRHP under Criteria B and C.

William French House (IHSSI Number 181-070-58015) (Appendix B, page B-3). The house is in the northwest quadrant of the SR 43 / West 2nd Street Intersection and is recommended eligible for the NRHP under Criteria B and C.

Brookston Carnegie Public Library (IHSSI Number 181-070-58020) (Appendix B, page B-3). The library is in the southeast quadrant of the SR 43 / West 2nd Street Intersection and is recommended eligible for the NRHP under Criteria A and C.

Brookston Unitarian Universalist Church (IHSSI Number 181-070-58021) (Appendix B, page B-3). The church is immediately south of the Brookston Carnegie Public Library and is recommended eligible for the NRHP under Criterion A.

Brookston Knights of Pythias Lodge (IHSSI Number 181-070-58024) (Appendix B, pages B-3 and B-4). The lodge is in the southwest quadrant of the SR 43 / West 3rd Street Intersection and is recommended eligible for the NRHP under Criterion C.

Murphy House (IHSSI Number 181-070-58025) (Appendix B, pages B-3 and B-4). The house is immediately south of the Brookston Knights of Pythias Lodge and is recommended eligible for the NRHP under Criterion C.

Historic Property Report (HPR)

The HPR was prepared by qualified professionals from RQAW (Koph and Boot, 2023) (Appendix D, pages D-32 and D-33). The report recommended the above eight properties eligible for the NRHP. The HPR was sent to consulting parties on July 6, 2023 (Appendix D, pages D-34 to D-38). A weblink to the HPR was also provided. In a letter dated August 4,

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Brookston Commercial Historic District (IHSSI Number 181-070-56001-56026) (Appendix B, pages B-3 and B-4).

The historic district qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected.

House at 105 North Ripley Street (IHSSI Number 181-070-58004) (Appendix B, page B-3).

The house qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will convert approximately 0.06 acre of the property to transportation use. The INDOT, acting on behalf of the FHWA, has determined the appropriate Section 106 finding is *No Adverse Effect*. Therefore, FHWA intends to issue a *de minimis* finding which satisfies the responsibilities of the FHWA under Section 4(f). In a letter dated August 4, 2023, the Indiana SHPO concurred with the *de minimis* finding (Appendix D, pages D-43 and D-44).

James F. French House (IHSSI Number 181-070-58008) (Appendix B, page B-3).

The house qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will temporarily occupy land from this resource. The INDOT, acting on behalf of the FHWA, has determined the Section 106 finding is *No Adverse Effect*. FHWA believes that the temporary occupancy will not constitute a Section 4(f) use because the conditions in 23 CFR 774.13(d) are satisfied (the duration is temporary, there is no change in ownership of the land, the scope of work is minor, there are no anticipated permanent adverse physical impacts, the land will be fully restored, and there is an agreement with the official with jurisdiction [OWJ] documenting these conditions). In this case the OWJ is the Indiana SHPO. In a letter dated August 4, 2023, the Indiana SHPO concurred with the *No Adverse Effect* Section 106 effect finding (Appendix D, pages D-43 and D-44).

William French House (IHSSI Number 181-070-58015) (Appendix B, page B-3).

The house qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected.

Brookston Carnegie Public Library (IHSSI Number 181-070-58020) (Appendix B, page B-3).

The library qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected.

Brookston Unitarian Universalist Church (IHSSI Number 181-070-58021) (Appendix B, page B-3).

The church qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected.

Brookston Knights of Pythias Lodge (IHSSI Number 181-070-58024) (Appendix B, pages B-3 and B-4).

The lodge qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected.

Murphy House (IHSSI Number 181-070-58025) (Appendix B, pages B-3 and B-4).

The house qualifies as a Section 4(f) resource since it is recommended eligible for the NRHP. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected.

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Frontier Elementary School (Appendix B, page B-5). The educational facility is east of SR 43 and between West 7th Street and West 10th Street. The school is publicly owned and has recreational features (e.g., playground and basketball court). The school itself would not qualify as a Section 4(f) resource; however, the recreational features may qualify as a Section 4(f) resource if they are open to the public. The basketball court and playground are approximately 55 feet east of the permanent right-of-way limits and are separated from the roadway by a chain link fence. The fence will not be impacted and will remain in place. Approximately 0.32 acre of permanent right-of-way, consisting of maintained lawn, will be needed from the school to install the storm sewer. Temporary right-of-way will not be needed from the school. The recreational features (e.g., playground and basketball court) will not be impacted / encroached upon. As such, the project will not use this resource by taking permanent right-of-way from any potential Section 4(f) land and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected. The Frontier Elementary School did not respond to the early coordination letter.

Juanita Waugh Park (also known as Colonel Isaac White Park) (Appendix B, page B-3). The recreational facility is in the southwest quadrant of SR 43 / West 1st Street Intersection. Since the park is open to the public and managed by a public entity (Brookston Town Council), it qualifies as a Section 4(f) resource. The project will not use this resource by taking permanent right-of-way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Therefore, a Section 4(f) use is not expected. The Town of Brookston Council did not respond to the early coordination letter.

Section 6(f) Involvement	Presence	Use		
Section 6(f) Property	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

Discuss Section 6(f) resources present or not present. Discuss if any conversion would occur because of this project. If a conversion occurs, discuss the conversion approval.

The U.S. Land and Water Conservation Fund Act of 1965 established the Land and Water Conservation Fund (LWCF), which was created to preserve, develop, and assure accessibility to outdoor recreation resources. Section 6(f) of this Act prohibits conversion of lands purchased with LWCF monies to non-recreation use.

A review of Section 6(f) properties on the INDOT ESD website revealed three properties within White County (Appendix I, page I-1). None of these properties are located within or adjacent to the project area. Impacts are not expected.

SECTION F – Air Quality

STIP/TIP and Conformity Status of the Project

- Is the project in the most current STIP/TIP?
- Is the project located in an MPO Area?
- Is the project in an air quality non-attainment or maintenance area?
- If yes, then:
 - Is the project in the most current MPO TIP?
 - Is the project exempt from conformity?
- If no, then:
 - Is the project in the Transportation Plan (TP)?
 - Is a hot spot analysis required (CO/PM)?

Yes	No
✓	
	✓
	✓

Location in STIP: STIP 2022-2026 – Appendix C – INDOT Rural and Local ([Indiana Department of Transportation \(INDOT\)](#)) (Appendix H, page H-1)

Name of MPO (if applicable): N/A

Location in TIP (if applicable): N/A

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Level of MSAT Analysis required?

Level 1a Level 1b Level 2 Level 3 Level 4 Level 5

Describe if the project is listed in the STIP and if it is in a TIP. Describe the attainment status of the county(ies) where the project is located. Indicate whether the project is exempt from a conformity determination. If the project is not exempt, include information about the TP and TIP. Describe if a hot spot analysis is required and the MSAT Level.

Statewide Transportation Improvement Program (STIP) and Transportation Improvement Program (TIP)

This project is included in the Fiscal Year (FY) 2022-2026 STIP (Appendix H, page H-1).

Attainment Status

This project is in White County, which is currently in attainment for all criteria pollutants according to the Environmental Protection Agency (EPA) Green Book website ([Nonattainment Areas for Criteria Pollutants \(Green Book\) | US EPA](#)). Therefore, the conformity procedures of 40 CFR Part 93 do not apply.

Mobile Source Air Toxics (MSAT)

This project is of a type qualifying as a categorical exclusion (Group 1) under 23 CFR 771.117(c) or exempt under the Clean Air Act conformity rule under 40 CFR 93.126. As such, a MSAT analysis is not required.

SECTION G - NOISE

Noise

Yes No

Is a noise analysis required in accordance with FHWA regulations and INDOT's traffic noise policy?

Date Noise Analysis was approved/technically sufficient by INDOT ESD: N/A

Describe if the project is a Type I or Type III project. If it is a Type I project, describe the studies completed to date and if noise impacts were identified. If noise impacts were identified, describe if abatement is feasible and reasonable and include a statement of likelihood.

The project is a Type III project. Per 23 CFR 772 and the current *Indiana Department of Transportation Traffic Noise Analysis Procedure*, this action does not require a formal noise analysis.

SECTION H – COMMUNITY IMPACTS

Regional, Community & Neighborhood Factors

Yes No

Will the proposed action comply with the local/regional development patterns for the area?

Will the proposed action result in substantial impacts to community cohesion?

Will the proposed action result in substantial impacts to local tax base or property values?

Will construction activities impact community events (festivals, fairs, etc.)?

Does the community have an approved transition plan?

If no, are steps being made to advance the community's transition plan?

Does the project comply with the transition plan? (Explain in the discussion below)

Discuss how the project complies with the area's local/regional development patterns; whether the project will impact community cohesion; and impact community events. Discuss how the project conforms with the ADA Transition Plan.

The project is not expected to result in substantial impacts to the community because it will not hinder access to properties within the area, divide existing communities, or cause negative economic impacts to the surrounding area. Providing ADA-compliant pedestrian facilities is anticipated to increase community cohesion. Therefore, the project will have minimal or no negative impacts on the community or local economy.

Per the Fairs and Festivals website (www.fairsandfestivals.net), accessed on February 14, 2023, by RQAW, no community events are currently scheduled within a 10-mile radius of the project area (zip code 47923). Any future events that may be planned are unlikely to be impacted by the project since vehicles can utilize the detours during construction.

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White County has an approved ADA Transition Plan dated July 5, 2022 ([White-County-ADA-Transition-Plan-07-05-22.pdf \(in.gov\)](#)). The project will comply with the ADA Transition Plan by providing ADA compliant pedestrian facilities within the project area.

Public Facilities and Services

Discuss what public facilities and services are present in the project area and impacts (such as MOT) that will occur to them. Include how the impacts have been minimized and what coordination has occurred. Some examples of public facilities and services include health facilities, educational facilities, public and private utilities, emergency services, religious institutions, airports, transportation or public pedestrian and bicycle facilities.

Based on a desktop review, aerial maps of the project area (Appendix B, pages B-3 to B-6), and the RFI report (Appendix E, pages E-3 and E-10), there are 13 public facilities mapped within the 0.50-mile search radius. There are three public facilities mapped within or adjacent to the project. Five public facilities were identified within or adjacent to the project area during the site visit on April 11, 2022, by RQAW.

Brookston Carnegie Public Library (Appendix B, page B-3). The library is in the southeast quadrant of the SR 43 / West 2nd Street Intersection. Permanent or temporary right-of-way will not be needed from the library. The Brookston Carnegie Public Library did not respond to the early coordination letter. Access to the property will be maintained during construction. Refer to the *Section 4(f) Resources / Section 6(f) Resources* section of this CE document for more details. Impacts are not expected.

Brookston Unitarian Universalist Church (Appendix B, page B-3). The religious institution is immediately south of the Brookston Carnegie Public Library. Permanent or temporary right-of-way will not be needed from the church. The Brookston Unitarian Universalist Church did not respond to the early coordination letter. Access to the property will be maintained during construction. Refer to the *Section 4(f) Resources / Section 6(f) Resources* section of this CE document for more details. Impacts are not expected.

Brookston Church of Christ (Appendix B, page B-3). The religious institution is in the northeast quadrant of the SR 18 / SR 43 Intersection. Permanent or temporary right-of-way will not be needed from the church. The Brookston Church of Christ did not respond to the early coordination letter. Access to the property will be maintained during construction. Impacts are not expected.

Frontier Elementary School (Appendix B, page B-5). The educational facility is east of SR 43 and between West 7th Street and West 10th Street. Approximately 0.32 acre of permanent right-of-way, consisting of maintained lawn, will be needed from the school to install the storm sewer. Temporary right-of-way will not be needed from the school. The recreational features (e.g., playground and basketball court) will not be impacted / encroached upon. The Frontier Elementary School did not respond to the early coordination letter. Access to the property will be maintained during construction. Refer to the *Section 4(f) Resources / Section 6(f) Resources* section of this CE document for more details. Impacts are not expected.

Juanita Waugh Park (also known as Colonel Isaac White Park) (Appendix B, page B-3). The recreational facility is in the southwest quadrant of SR 43 / West 1st Street Intersection. Permanent or temporary right-of-way will not be needed from the park. The Town of Brookston Council did not respond to the early coordination letter. Access to the property will be maintained during construction. Impacts are not expected.

Shultz / Private Airport. The private airport and located approximately 0.47 mile west of the project area. The Shultz / Private Airport did not respond to the early coordination letter. Impacts are not expected.

Early Coordination

Responses pertaining to public facilities and services were not received.

It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access.

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Environmental Justice (EJ) (Presidential EO 12898)

During the development of the project were EJ issues identified?

Does the project require an EJ analysis?

If yes, then:

Are any EJ populations located within the project area?

Will the project result in adversely high and disproportionate impacts to EJ populations?

	Yes	No
During the development of the project were EJ issues identified?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Does the project require an EJ analysis?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Are any EJ populations located within the project area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Will the project result in adversely high and disproportionate impacts to EJ populations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Indicate if EJ issues were identified during project development. If an EJ analysis was not required, discuss why. If an EJ analysis was required, describe how the EJ population was identified. Include if the project has a disproportionately high or adverse effect on EJ populations and explain your reasoning. If yes, describe actions to avoid, minimize and mitigate these effects.

Under FHWA Order 6640.23A, FHWA and the project sponsor, as a recipient of funding from FHWA, are responsible to ensure their programs, policies, and activities do not have a disproportionately high and adverse effect on minority or low-income populations. Per the current INDOT CE Manual, an Environmental Justice (EJ) Analysis is required for any project that has two or more relocations or 0.50 acre or more of additional permanent right-of-way. The project will require more than 0.50 acre of permanent right-of-way but will not require any relocations. Therefore, an EJ Analysis is required.

Potential EJ impacts are detected by finding minority and low-income populations relative to a reference population to determine if populations of EJ concern exists and whether there could be disproportionately high and adverse impacts to them. The reference population may be a county, city or town and is called the Community of Comparison (COC). In this project, the COC is White County. The community that overlaps the project area is called the Affected Community (AC). In this project, the AC is Census Tract 9588. An AC has a population of concern for EJ if the population is more than 50 percent minority or low-income or if the minority of low-income population is 125 percent of the COC.

Data from the U.S. Census Bureau (USCB) (2016 to 2020) was obtained from the USCB webpage ([Census Bureau Data](#)) on October 12, 2022, by RQAW. Refer to the table below for a summary of the data for minority and low-income populations within the AC.

Low-income and Minority Data (USCB, 2016 to 2020)		
	COC: White County, Indiana	AC: Census Tract 9588 White County, Indiana
Percent Low-income	9.3%	1.5%
125% of COC	11.7%	AC ≤ 125% COC
EJ Population of Concern		No
Percent Minority	11.1%	4.1%
125% of COC	13.9%	AC ≤ 125% COC
EJ Population of Concern		No

The AC has a percent low-income of 1.5 percent which is below 50 percent and below the 125 percent COC threshold (11.7 percent). The AC has a percent minority of 4.1 percent which is below 50 percent and below the 125 percent COC threshold (13.9 percent). Therefore, there are no low-income or minority populations of EJ concern.

Conclusion

Refer to the census data sheets, map, and calculations in Appendix I, pages I-66 to I-71. Further EJ analysis is not warranted.

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Yes No

Relocation of People, Businesses or Farms

Will the proposed action result in the relocation of people, businesses, or farms?

	✓
	✓

Is a BIS or CSRS required?

Number of relocations: Residences: N/A Businesses: N/A Farms: N/A Other: N/A

Discuss any relocations that will occur due to the project. If a BIS or CSRS is required, discuss the results in the discussion below.

The project will not require any relocations of people, businesses, or farms.

SECTION I – HAZARDOUS MATERIALS & REGULATED SUBSTANCES

Documentation

Hazardous Materials & Regulated Substances (Mark all that apply)

Red Flag Investigation (RFI)

Phase I Environmental Site Assessment (Phase I ESA)

Phase II Environmental Site Assessment (Phase II ESA)

Design/Specifications for Remediation required?

Date RFI concurrence by INDOT SAM (if applicable): June 14, 2022

Include a summary of the potential hazardous material concerns found during review. Discuss in depth sites found within, directly adjacent to, or ones that could impact the project area. Refer to current INDOT SAM guidance. If additional documentation (special provisions, pay quantities, etc.) is needed, include in discussion. Include applicable commitments.

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Based on a review of geographic information system (GIS) and available public records, the RFI report was prepared by RQAW, and concurred by the INDOT Site Assessment & Management (SAM) on June 14, 2022 (Appendix E, pages E-1 to E-12). Seventeen hazardous material concern sites are mapped within the 0.50-mile search radius.

Hazardous Material Concern Sites

- 2 Underground Storage Tank (UST) Sites
- 4 Leaking Underground Storage Tank (LUST) Sites
- 1 Brownfields Site
- 1 Institutional Controls Site
- 5 National Pollutant Discharge Elimination System (NPDES) Facilities
- 3 NPDES Pipe Locations
- 1 Notice of Contamination Site

One hazardous material concern site could affect the project area.

UST / LUST / Institutional Controls / Notice of Contamination Site. Family Express #29 (AI Number 57757) is an active gas station at 211 South Prairie Street. An Environmental Restrictive Covenant (ERC) was placed on the property which specifically prohibits the use of groundwater, but not soil. Coordination will be conducted with the IDEM Institutional Controls Section (institutionalcontrols@idem.IN.gov) before Ready for Contracts (RFC). Refer to Appendix G of the SAM Manual for the recommended procedure to manage and report contamination.

The No Further Action (NFA) Determination Pursuant to Remediation Closure Guide (RCG) stated that Contaminates of Concern (COCs) above IDEM RCG levels remain in the right-of-way and the area surrounding the project site. In September of 2021, the site experienced a release of approximately 51 gallons of fuel during a delivery. Free product entered the sanitary sewer system and discharged into the river to the south. There is potential to encounter contaminated soil and groundwater surrounding the storm sewer. Residual soil contamination is at depths greater than six feet below ground surface (bgs) and should not impact the project; however, if excavation occurs within this area, proper handling, removal, and disposal of soil and / or groundwater may be necessary.

Monitoring wells are currently present within the INDOT right-of-way. If groundwater monitoring wells are encountered in the project area, they should be maintained in-place. If they cannot be maintained, the contractor must contact the INDOT Project Manager who will notify the INDOT Permits Group. The INDOT Permits Group will notify the permit holder that the well must be removed prior to construction. The permit holder manages coordination with IDEM and the INDOT Permits Group for replacement or relocation of the well. If a property owner cannot be found in connection with the monitoring well, then well abandonment will be included in the project contract. All well abandonment activities must be completed by an Indiana Licensed Well Driller per IAC 312-13-10. Regardless of whether the well is abandoned by the contractor or the property owner, a record of well abandonment, including the well driller's license number, must be provided to the INDOT Project Manager once the well has been abandoned.

Part IV – Permits and Commitments

PERMITS CHECKLIST

Permits (mark all that apply)

Likely Required

Army Corps of Engineers (404/Section10 Permit)

- Nationwide Permit (NWP)
- Regional General Permit (RGP)
- Individual Permit (IP)
- Other

IN Department of Environmental Management (401/Rule 5)

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Permits (mark all that apply)

Likely Required

- Nationwide Permit (NWP)
- Regional General Permit (RGP)
- Individual Permit (IP)
- Isolated Wetlands
- Rule 5
- Other

IN Department of Natural Resources

- Construction in a Floodway
- Navigable Waterway Permit
- Other

Mitigation Required

US Coast Guard Section 9 Bridge Permit

Others (Please discuss in the discussion below)

✓

List the permits likely required for the project and summarize why the permits are needed, including permits designated as "Other."

Because the project will not impact water resources, a USACE Section 404 Regional General Permit and IDEM Section 401 Water Quality Certification will not be required.

Because the project will result in more than one acre of land disturbance (6.6 acres), an IDEM Construction Stormwater General Permit (CSGP) (formerly known as a Rule 5 Permit) will be required.

In their early coordination response, the IDNR Division of Fish and Wildlife stated the project may require the formal approval for construction in a floodway unless it qualifies under the INDOT and IDNR MOU for Maintenance Activity Exemption, dated March 1997 (Appendix C, pages C-11 to C-13). It will be determined later if the full depth pavement replacement and storm sewer work within the limits of the Moots Creek floodway will meet the conditions of the maintenance MOU. As such, a Construction in a Floodway (CIF) permit may be required.

Applicable recommendations provided by resource agencies are included in the *Environmental Commitments* section of this CE document. If permits are found to be necessary, the conditions of the permit will be the requirements of the project and will supersede these recommendations. It is the responsibility of the project sponsor to identify and obtain all required permits.

ENVIRONMENTAL COMMITMENTS

List all commitments and include the name of agency/organization requesting/requiring the commitment(s). Listed commitments should be numbered.

Firm

1. If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division and the INDOT District Environmental Section will be contacted immediately. (INDOT ESD and INDOT Crawfordsville District)
2. It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access. (INDOT ESD)
3. One UST / LUST / Institutional Controls / Notice of Contamination Site is within the project area. Family Express #29 (AI Number 57757) is an active gas station at 211 South Prairie Street. Coordination will be conducted with the IDEM Institutional Controls Section (institutionalcontrols@idem.IN.gov) before Ready for Contracts (RFC). Refer to Appendix G of the SAM Manual for the recommended procedure to manage and report contamination. (INDOT SAM)
4. One UST / LUST / Institutional Controls / Notice of Contamination Site is within the project area. Family Express #29 (AI Number 57757) is an active gas station at 211 South Prairie Street. There is potential to encounter contaminated soil and groundwater surrounding the storm sewer. If excavation occurs within this area, proper handling, removal, and disposal of soil and / or groundwater may be necessary. (INDOT SAM)

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5. One UST / LUST / Institutional Controls / Notice of Contamination Site is within the project area. Family Express #29 (AI Number 57757) is an active gas station at 211 South Prairie Street. Monitoring wells are currently present within the INDOT right-of-way. If groundwater monitoring wells are encountered within the project area, they should be maintained in place. If they cannot be maintained, the contractor must contact the INDOT Project Manager who will notify the INDOT Permits Group. The INDOT Permits Group will notify the permit holder that the well must be removed prior to construction. The permit holder manages coordination with IDEM and the INDOT Permits Group for replacement or relocation of the well. If a property owner cannot be found in connection with the monitoring well, then well abandonment will be included in the project contract. All well abandonment activities must be completed by an Indiana Licensed Well Driller per IAC 312-13-10. Regardless of whether the well is abandoned by the contractor or the property owner, a record of well abandonment, including the well driller's license number, must be provided to the INDOT Project Manager once the well has been abandoned. (INDOT SAM)
6. Access to the Brookston Church of Christ will be maintained during construction. (INDOT ESD and INDOT Crawfordsville District)
7. Access to Frontier Elementary School will be maintained during construction. (INDOT ESD and INDOT Crawfordsville District)
8. Access to Juanita Waugh Park will be maintained during construction. (INDOT ESD and INDOT Crawfordsville District)
9. If any utility relocations result in any other environmental impacts that are not assessed in this environmental document, an Additional Information (AI) document will need to be prepared. (INDOT ESD and INDOT Crawfordsville District)
10. USFWS Bridge / Structure Assessments shall take place no earlier than two years prior to the start of construction. If construction will begin after April 11, 2024, an inspection of structures by a qualified individual, must be performed. Inspection of structures should check for presence of bats / bat indicators and / or presence of birds. The results of the inspection must indicate no signs of bats or birds. If signs of bats or birds are documented during this inspection, the INDOT District Environmental Manager must be contacted immediately. (INDOT ESD)
11. General AMM 1: Ensure all operators, employees, and contractors working in areas of known or presumed bat habitat are aware of all FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable AMMs. (USFWS)
12. Lighting AMM 1: Direct temporary lighting away from suitable habitat during the active season. (USFWS)
13. Lighting AMM 2: When installing new or replacing existing permanent lights, use downward-facing, full cut-off lens lights (with same intensity or less for replacement lighting); or for those transportation agencies using BUG system developed by the Illuminating Engineering Society, be as close to 0 for all three ratings with a priority of "uplight" or 0 and "backlight" as low as practicable. (USFWS)
14. Tree Removal AMM 1: Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to avoid tree removal. (USFWS)
15. Tree Removal AMM 2: Apply time of year restrictions (October 1 through March 31) for tree removal when bats are not likely to be present, or limit tree removal to 10 or fewer trees per project at any time of year within 100 feet of existing road/rail surface and outside of documented roosting/foraging habitat or travel corridors; visual emergence survey must be conducted with no bats observed. (USFWS and IDNR Division of Fish and Wildlife)
16. Tree Removal AMM 3: Ensure tree removal is limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits). (USFWS)
17. Tree Removal AMM 4: Do not remove documented Indiana bat or NLEB roosts that are still suitable for roosting, or trees within 0.25 miles of roosts, or documented foraging habitat any time of year. (USFWS)
18. A copy of the right-of-way plans will be provided to the White County Area Plan Commission. (White County Area Plan Commission)

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For Consideration

1. It is recommended to use more sustainable approaches to stormwater management, such as retention basins, constructed wetlands, rain gardens, and infiltration basins or trenches, and pervious pavement. (IDNR Division of Fish and Wildlife)
2. It is recommended to use BMPs to limit the migration of polycyclic aromatic hydrocarbons (PAHs) into waterways. The use of sealants that are free of petroleum and coal tar-based sealants is encouraged. (IDNR Division of Fish and Wildlife)
3. Where possible, road runoff should be directed to riprap turnouts and sediment filtration prior to entering a stream. It is recommended to use pollutant trapping technology such as storm drain inserts, etc. to reduce the runoff of roadside pollutants. (IDNR Division of Fish and Wildlife)
4. It is recommended to avoid removing urban trees to the greatest extent possible and replacing trees that must be removed. (IDNR Division of Fish and Wildlife)
5. Impacts to non-wetland forest of one acre or more should be mitigated at a minimum 2:1 ratio. Impacts to non-wetland forest under one acre in an urban setting should be mitigated by planting five trees, 1 inch to 2 inches in diameter-at-breast height (dbh), for each tree which is removed that is 10 inches dbh or greater (5:1 mitigation based on the number of large trees) or by using the 1:1 replacement ratio based on area depending on the type of habitat impacted (individual canopy tree removal in an urban streetscape or park-like environment versus removal of habitat supporting a tree canopy, woody understory, and herbaceous layer). (IDNR Division of Fish and Wildlife)
6. Impacts to non-wetland forest under 0.10 acre in an urban area may still involve the replacement of large diameter trees but typically do not require any additional mitigation or additional plantings beyond seeding and stabilizing disturbed areas. There are exceptions for high quality habitat sites, however. (IDNR Division of Fish and Wildlife)

Appendix A: INDOT Supporting Documentation

CE Level Thresholds Table A-1

Appendix B: Graphics

General Location Map B-1
Topographic Map B-2
Aerial Photograph Key Maps B-3
Project Area Photographs B-7
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Appendix C: Early Coordination

Example Early Coordination Letter (*appendix omitted*) C-1
IGWS Electronic Response C-4
NRCS Response C-7
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White County Area Plan Commission Responses C-12
IDEM Ground Water Section Response C-15
White County Soil and Water Conservation District C-18
USFWS Coordination
 IPaC Species List C-20
 IPaC Concurrence Verification C-36

Appendix D: Section 106 of the National Historic Preservation Act (NHPA)

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Consulting Parties Letter D-34
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Appendix E: Red Flag Investigation and Hazardous Materials

Red Flag Investigation E-1

Appendix F: Water Resources

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Appendix G: Public Involvement

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Public Involvement Plan G-2

Appendix H: Air Quality

STIP Page H-1

Appendix I: Additional Studies

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Abbreviated Engineering Assessment (*some appendices omitted*) I-32
EJ Analysis I-66

Categorical Exclusion

Appendix A

INDOT Supporting Documentation

Categorical Exclusion Level Thresholds

	PCE	Level 1	Level 2	Level 3	Level 4 ¹
Section 106	Falls within guidelines of Minor Projects PA	“No Historic Properties Affected”	“No Adverse Effect”	-	“Adverse Effect” Or Historic Bridge involvement ²
Stream Impacts³	No construction in waterways or water bodies	< 300 linear feet of stream impacts	≥ 300 linear feet of stream impacts	-	USACE Individual 404 Permit ⁴
Wetland Impacts³	No adverse impacts to wetlands	< 0.1 acre	-	< 1.0 acre	≥ 1.0 acre
Right-of-way⁵	Property acquisition for preservation only or none	< 0.5 acre	≥ 0.5 acre	-	-
Relocations⁶	None	-	-	< 5	≥ 5
Threatened/Endangered Species (Species Specific Programmatic for Indiana bat & northern long eared bat) *	“No Effect”, “Not likely to Adversely Affect” (With select AMMs ⁷)	“Not likely to Adversely Affect” (With any AMMs or commitments)	-	“Likely to Adversely Affect”	Project does not fall under Species Specific Programmatic ⁸
Threatened/Endangered Species (Any other species) *	Falls within guidelines of USFWS 2013 Interim Policy or “No Effect”	“Not likely to Adversely Affect”	-	-	“Likely to Adversely Affect”
Environmental Justice	No disproportionately high and adverse impacts	-	-	-	Potential ⁹
Sole Source Aquifer	No Detailed Groundwater Assessment	-	-	-	Detailed Groundwater Assessment
Floodplain	No Substantial Impacts	-	-	-	Substantial Impacts
Section 4(f) Impacts	None	-	-	-	Any ¹⁰
Section 6(f) Impacts	None	-	-	-	Any
Permanent Traffic Alteration	None	-	-	-	Any
Noise Analysis Required	No	-	-	-	Yes
Air Quality Analysis Required	No	-	-	-	Yes ¹¹
Approval Level <ul style="list-style-type: none"> • District Env. (DE) • Env. Serv. Div. (ESD) • FHWA 	Concurrence by DE or ESD	DE or ESD	DE or ESD	DE and/or ESD	DE and/or ESD; and FHWA

¹ Coordinate with INDOT Environmental Services Division. INDOT will then coordinate with the appropriate FHWA Environmental Specialist.

² Any involvement with a bridge processed under the Historic Bridge Programmatic Agreement.

³ Total permanent impacts to streams (linear feet) and wetlands (acres).

⁴ US Army Corps of Engineers Individual 404 Permit

⁵ Total permanent and temporary right-of-way. This does not include reacquisition of existing apparent right-of-way.

⁶ If any relocations are within an area with a known or suspected Environmental Justice (EJ) or disadvantaged population, or has greater than 5 relocations, a conversation with FHWA, through INDOT ESD, is needed to confirm NEPA classification and outreach plan for the project.

⁷ Avoidance and Mitigation Measures (AMMs) determined by the IPAC determination key to be required that are not tree AMMs, bridge AMMs, or structure AMMs.

⁸ Projects that do not fall under a Species Specific Programmatic and results in a “Likely to Adversely Affect”. Other findings can be processed as a lower level CE.

⁹ Potential for causing a disproportionately high and adverse impact.

¹⁰ Section 4(f) use resulting in an Individual, Programmatic, or *de minimis* evaluation. The only exception is a *de minimis* evaluation for historic properties (Effective January 2, 2020). If a historic property *de minimis* and no other use, mark the *None* column.

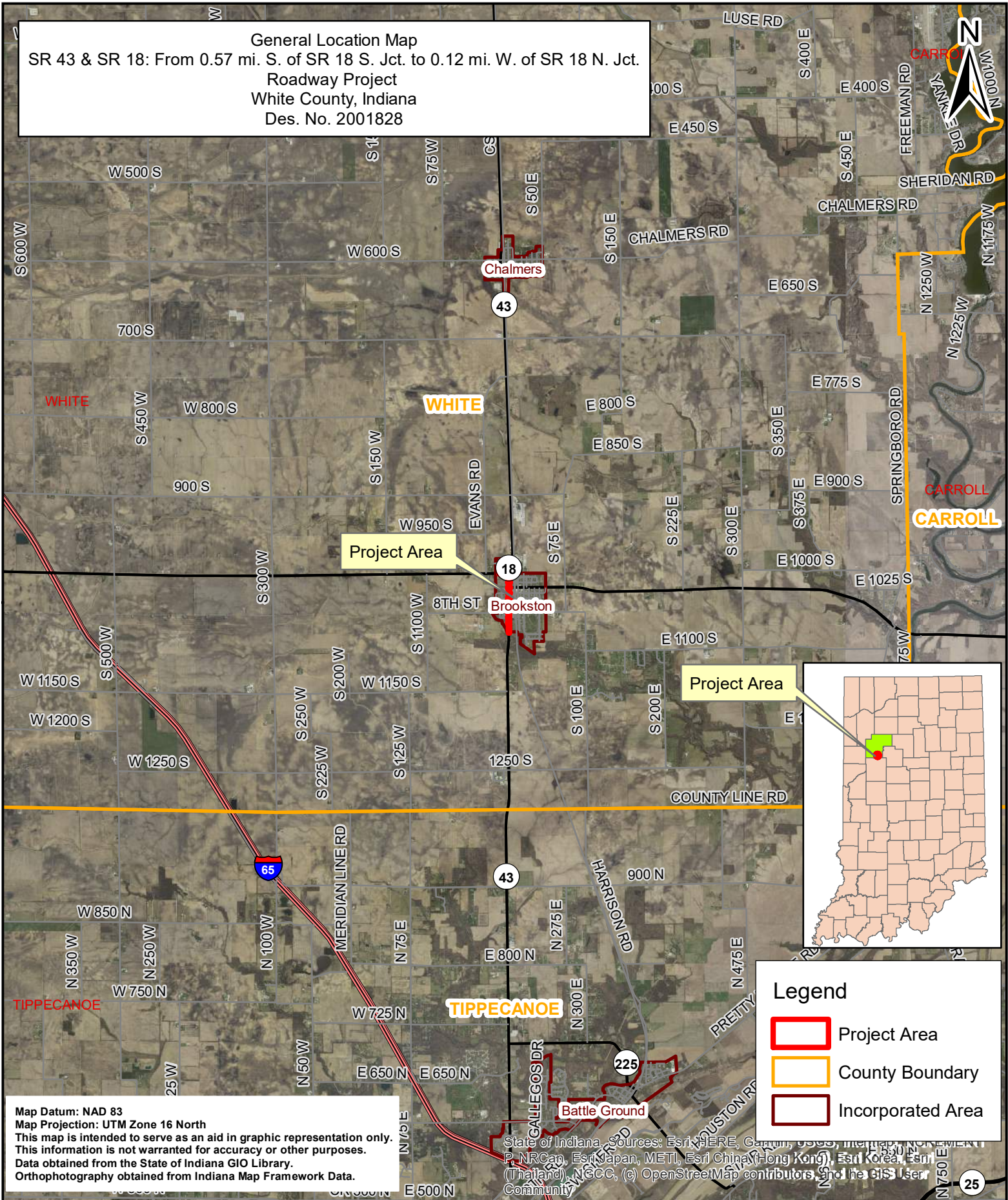
¹¹ Hot Spot Analysis and/or MSAT Quantitative Emission Analysis.

* Includes the threatened/endangered species critical habitat

Note: Substantial public or agency controversy may require a higher-level NEPA document.

Categorical Exclusion
Appendix B
Graphics

General Location Map
 SR 43 & SR 18: From 0.57 mi. S. of SR 18 S. Jct. to 0.12 mi. W. of SR 18 N. Jct.
 Roadway Project
 White County, Indiana
 Des. No. 2001828

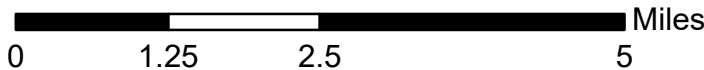


Map Datum: NAD 83
 Map Projection: UTM Zone 16 North
 This map is intended to serve as an aid in graphic representation only.
 This information is not warranted for accuracy or other purposes.
 Data obtained from the State of Indiana GIO Library.
 Orthophotography obtained from Indiana Map Framework Data.

State of Indiana. Sources: Esri, HERE, Garmin, USGS, Intermap, IGN, NOAA, NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

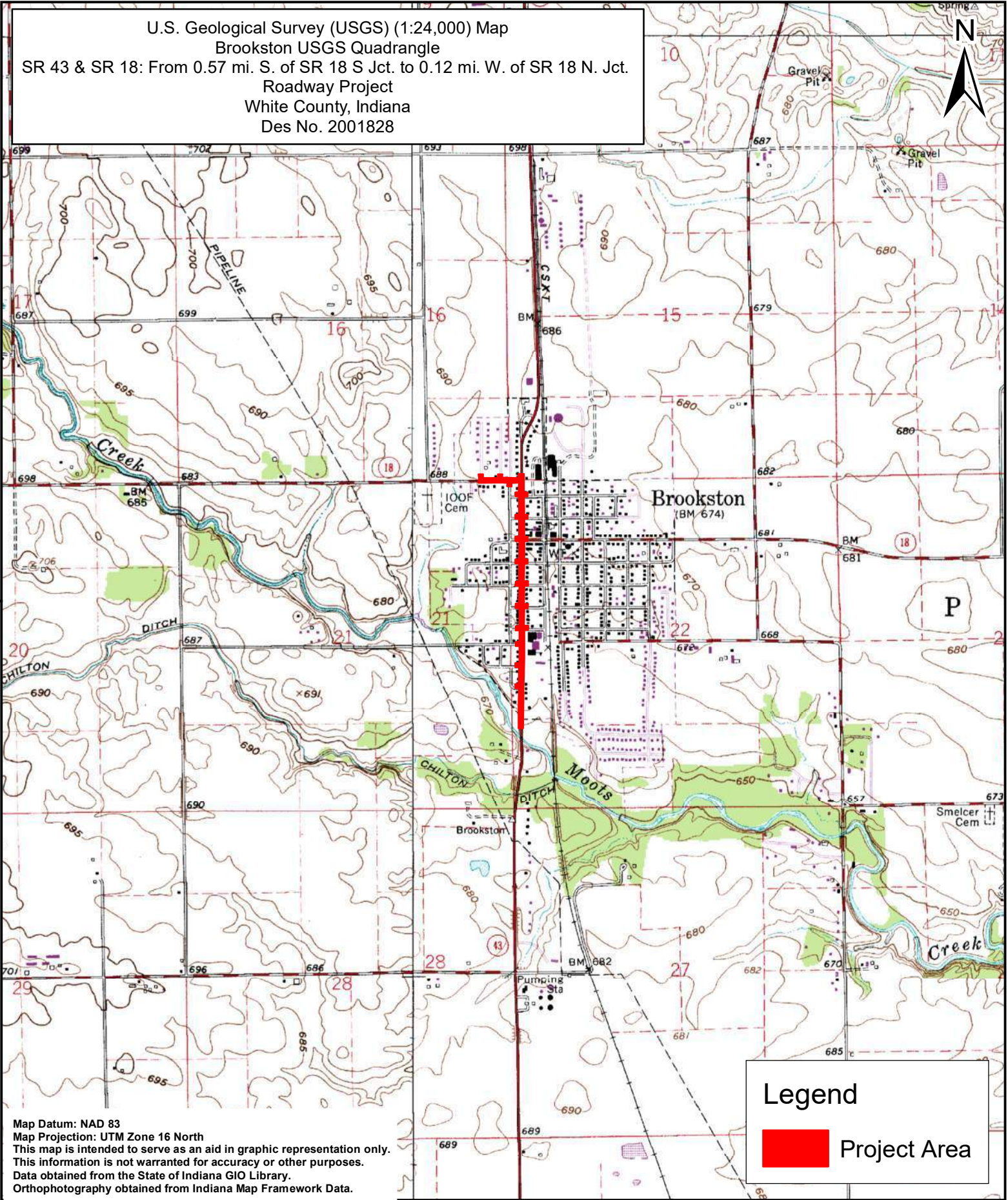


General Location Map




Township: Prairie
 County: White

U.S. Geological Survey (USGS) (1:24,000) Map
 Brookston USGS Quadrangle
 SR 43 & SR 18: From 0.57 mi. S. of SR 18 S Jct. to 0.12 mi. W. of SR 18 N. Jct.
 Roadway Project
 White County, Indiana
 Des No. 2001828



Map Datum: NAD 83
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Legend

 Project Area



USGS Topographic Map

0 0.3 0.6 1.2 Miles

Township: Prairie
 County: White

Photo Location Map
 SR 43 & SR 18: From 0.57 mi. S. of SR 18 S Jct.
 to 0.12 mi. W. of SR 18 N. Jct.
 Roadway Project
 White County, Indiana
 Des. No. 2001828

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-  Photo Points
-  Temporary Right-of-way
-  Permanent Right-of-way
-  Reacquired Right-of-way
-  Construction Limits
-  Historic Resource Boundary
-  Active Extent
-  Map Extents
-  Project Area

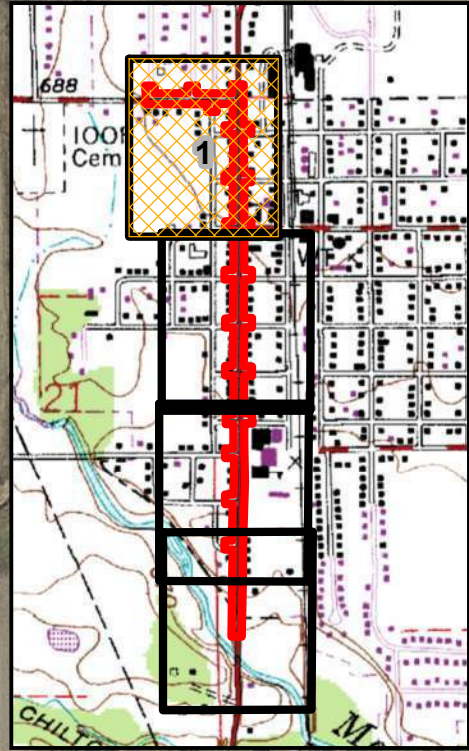
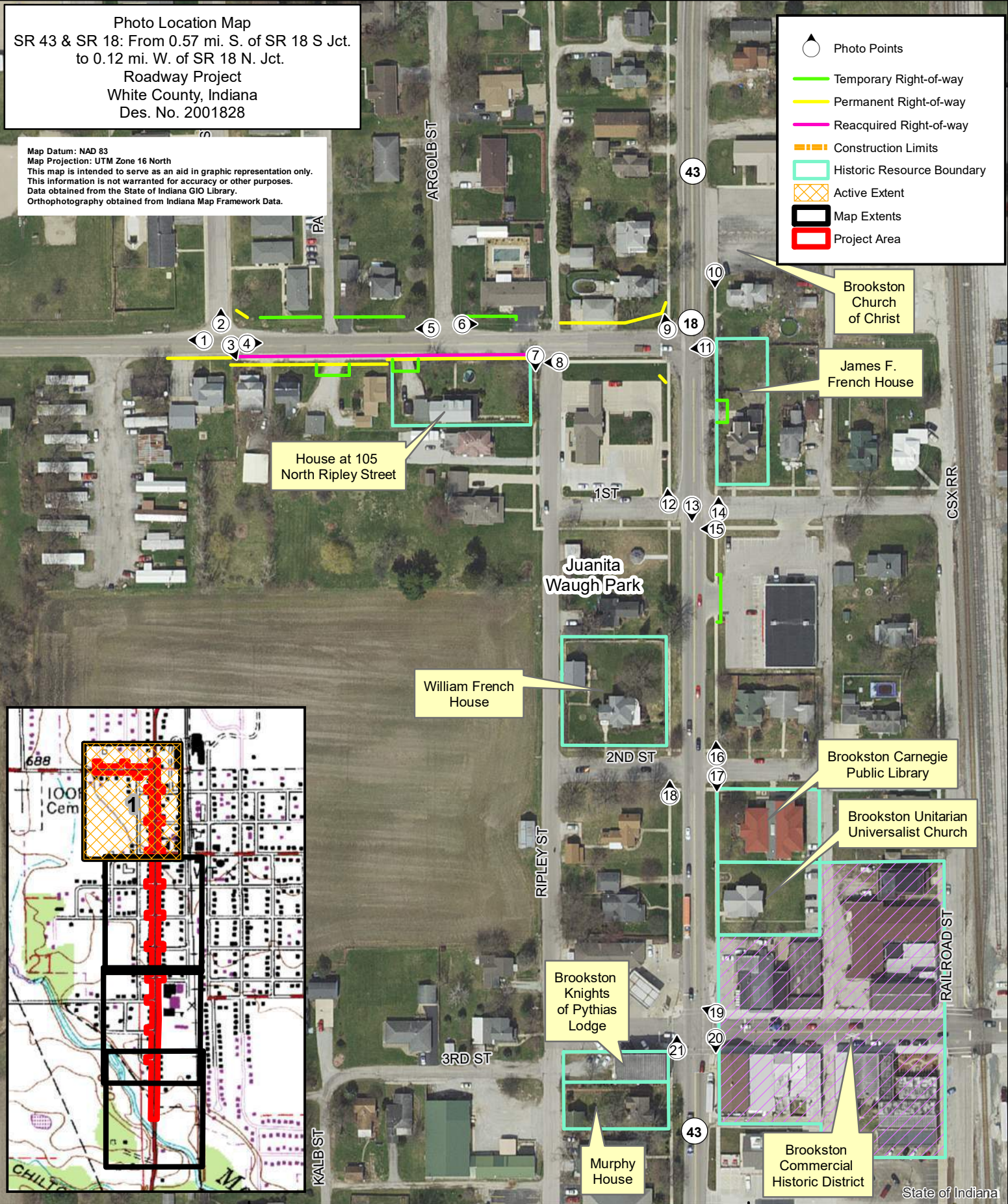


Photo Location Map 1 of 4

0 145 290 580 Feet

Township: Prairie
 County: White

N


Photo Location Map
 SR 43 & SR 18: From 0.57 mi. S. of SR 18 S Jct.
 to 0.12 mi. W. of SR 18 N. Jct.
 Roadway Project
 White County, Indiana
 Des. No. 2001828

Map Datum: NAD 83
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-  Permanent Right-of-way
-  Reacquired Right-of-way
-  Construction Limits
-  Historic Resource Boundary
-  Active Extent
-  Map Extents
-  Project Area

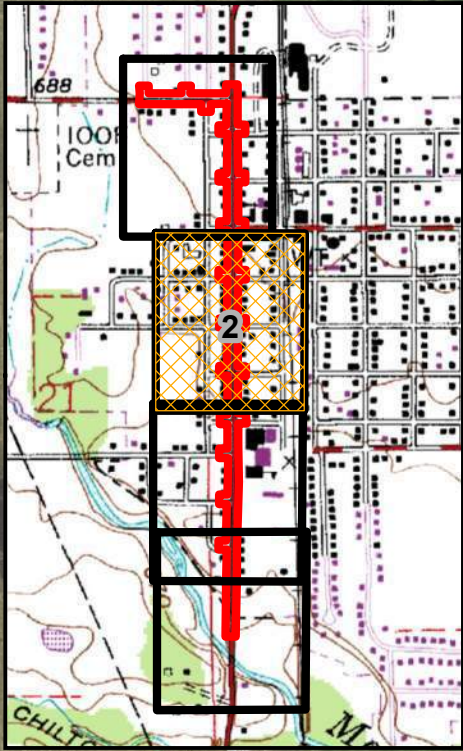
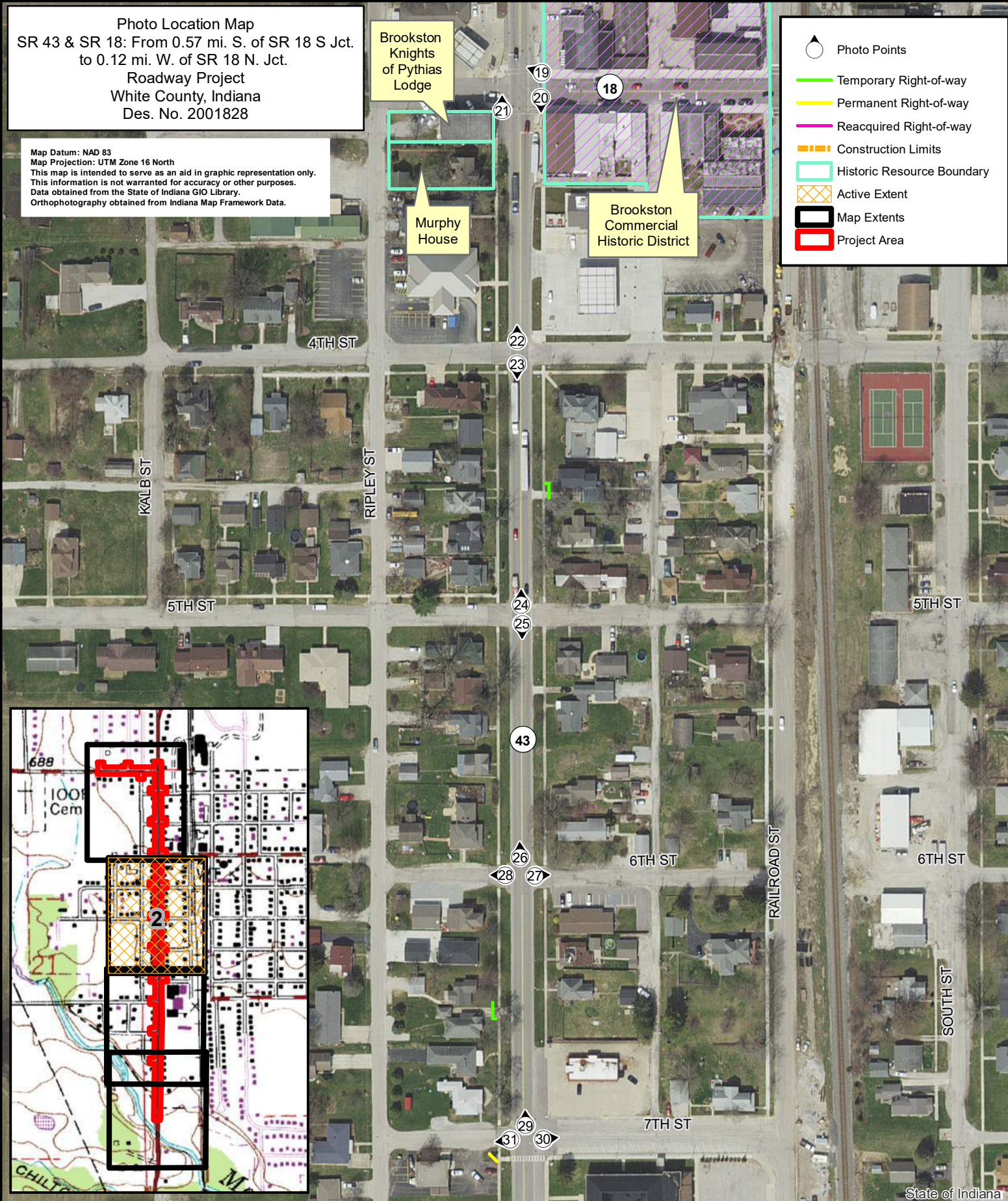


Photo Location Map 2 of 4

0 145 290 580 Feet

Township: Prairie
 County: White

Photo Location Map
 SR 43 & SR 18: From 0.57 mi. S. of SR 18 S Jct.
 to 0.12 mi. W. of SR 18 N. Jct.
 Roadway Project
 White County, Indiana
 Des. No. 2001828

Map Datum: NAD 83
 Map Projection: UTM Zone 16 North
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 Data obtained from the State of Indiana GIO Library.
 Orthophotography obtained from Indiana Map Framework Data.

-  Photo Points
-  Temporary Right-of-way
-  Permanent Right-of-way
-  Reacquired Right-of-way
-  Construction Limits
-  Historic Resource Boundary
-  Active Extent
-  Map Extents
-  Project Area

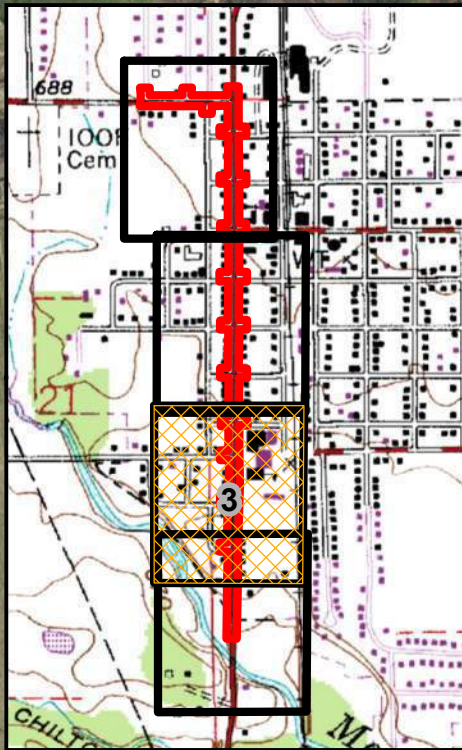
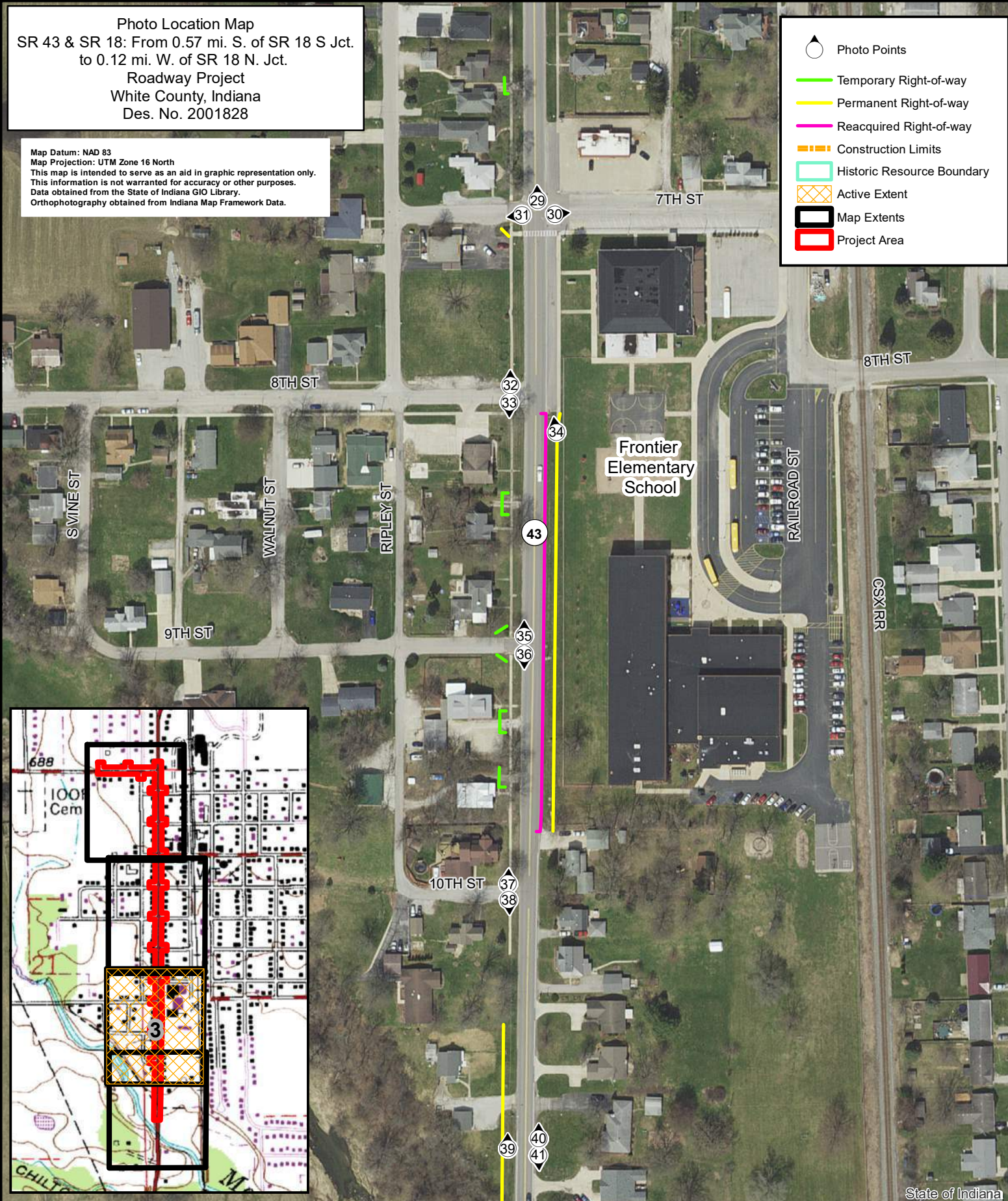


Photo Location Map 3 of 4

0 145 290 580 Feet

Township: Prairie
 County: White


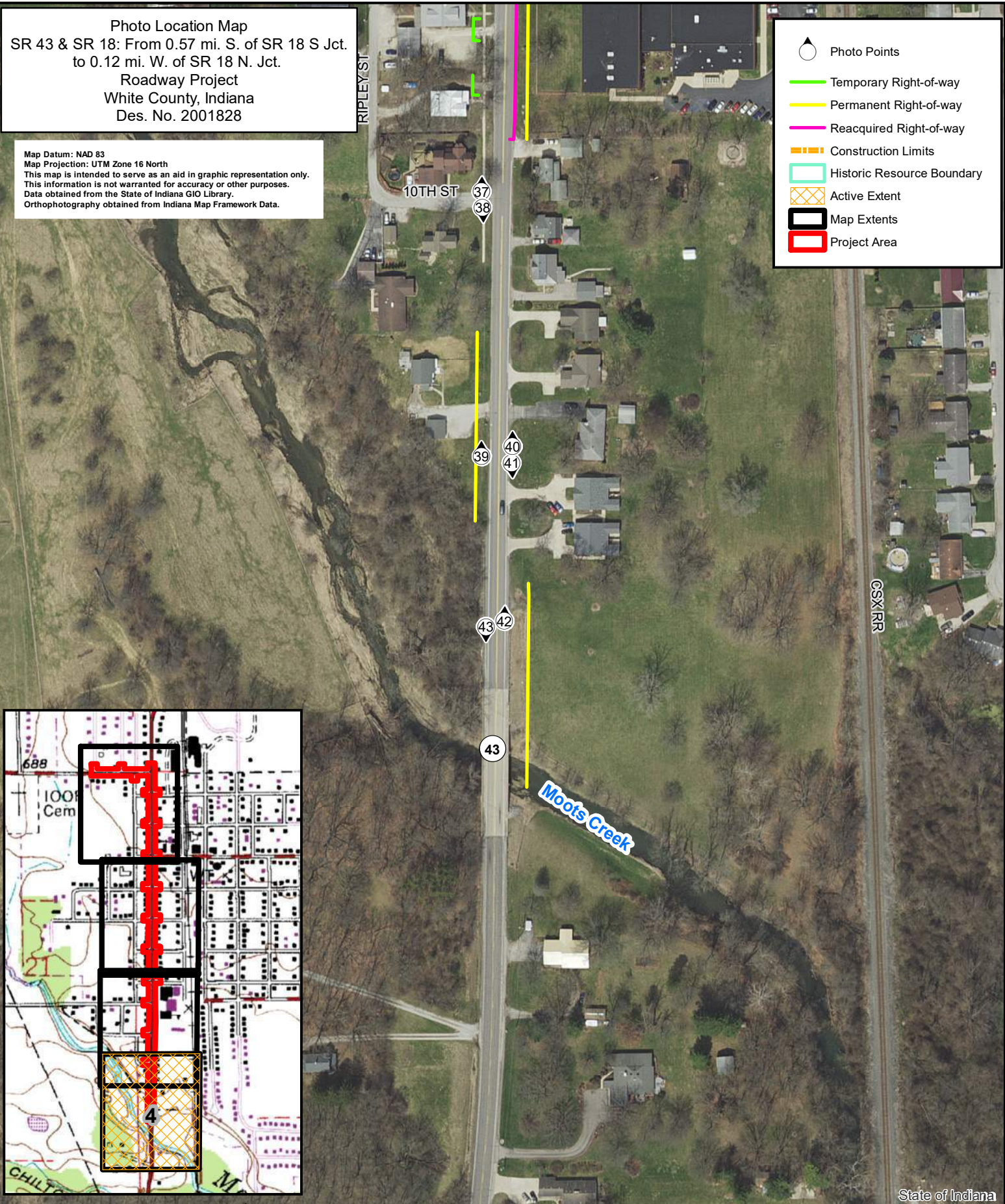
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Photo Location Map
 SR 43 & SR 18: From 0.57 mi. S. of SR 18 S Jct.
 to 0.12 mi. W. of SR 18 N. Jct.
 Roadway Project
 White County, Indiana
 Des. No. 2001828

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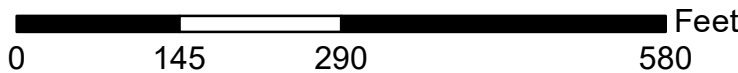
-  Photo Points
-  Temporary Right-of-way
-  Permanent Right-of-way
-  Reacquired Right-of-way
-  Construction Limits
-  Historic Resource Boundary
-  Active Extent
-  Map Extents
-  Project Area



State of Indiana



Photo Location Map 4 of 4



Township: Prairie
 County: White





1. Looking west from the SR 18 / North Clawil Street Intersection at area adjacent to the project area (western project terminus). Note: SR 18 is known locally as West Fowler Road.



2. Looking north from the SR 18 / North Clawil Street Intersection at existing sidewalks along North Clawil Street.



3. Looking southeast from the SR 18 / North Clawil Street Intersection at existing sidewalk terminating.



4. Looking east from the SR 18 / North Clawil Street Intersection at roadway and adjacent landscape.



5. Looking west from the SR 18 / Argold Street Intersection at roadway and adjacent landscape.



6. Looking east from the SR 18 / Argold Street Intersection at roadway and adjacent landscape.



7. Looking south from the SR 18 / Ripley Street Intersection at existing sidewalk along the west side of Ripley Street.



8. Looking west from the SR 18 / Ripley Street Intersection at existing sidewalk and curb ramp along the south side of Ripley Street.



9. Looking north / northwest from the SR 18 North Junction / SR 43 Intersection at existing sidewalk and curb ramp along the west side of SR 43. Note: SR 43 is known locally as North Prairie Street.



10. Looking south from the SR 18 North Junction / SR 43 Intersection at existing sidewalk along the east side of SR 18 (northern project terminus).



11. Looking west from the SR 18 North Junction / SR 43 Intersection at roadway and adjacent landscape.



12. Looking north from the SR 18 / West 1st Street Intersection at existing sidewalk and curb ramp along the west side of SR 18.



13. Looking south from the SR 18 / West 1st Street Intersection at roadway and adjacent landscape.



14. Looking north from the SR 18 / West 1st Street Intersection at existing sidewalk and curb ramps along the east side of SR 18.



15. Looking west from the SR 18 / West 1st Street Intersection at existing sidewalk, curb ramps, and Jaunita Park.



16. Looking north from the SR 18 / West 2nd Street Intersection at existing sidewalk and curb ramp along the east side of SR 18.



17. Looking south from the SR 18 / West 2nd Street Intersection at existing sidewalk and curb ramp along the east side of SR 18.



18. Looking north from the SR 18 / West 2nd Street Intersection at existing sidewalk and curb ramps along the west side of SR 18.



19. Looking west / northwest from the SR 18 South Junction / SR 43 Intersection at existing pedestrian facilities. Note: SR 18 is known locally as West 3rd Street.



20. Looking south from the SR 18 South Junction / SR 43 Intersection at existing pedestrian facilities.



21. Looking north from the SR 18 South Junction / SR 43 Intersection at roadway and adjacent landscape.



22. Looking north from the SR 43 / West 4th Street Intersection at roadway and adjacent landscape.



23. Looking south from the SR 43 / West 4th Street Intersection at roadway and adjacent landscape.



24. Looking north from the SR 43 / West 5th Street Intersection at roadway and adjacent landscape.



25. Looking south from the SR 43 / West 5th Street Intersection at roadway and adjacent landscape.



26. Looking north from the SR 43 / West 6th Street Intersection at roadway and adjacent landscape.



27. Looking east from the SR 43 / West 6th Street Intersection at area adjacent to the project area.



28. Looking west from the SR 43 / West 6th Street Intersection at area adjacent to the project area.



29. Looking north from the SR 43 / West 7th Street Intersection at roadway and adjacent landscape.



30. Looking east from the SR 43 / West 7th Street Intersection at area adjacent to the project area, including brick pavers underneath the asphalt and Frontier Elementary School.



31. Looking west from the SR 43 / West 7th Street Intersection at area adjacent to the project area.



32. Looking north from the SR 43 / West 8th Street Intersection at existing sidewalk and curb ramp along the west side of SR 43 and Frontier Elementary School.



33. Looking south from the SR 43 / West 8th Street Intersection at existing sidewalk and curb ramp along the west side of SR 43 and Frontier Elementary School.



34. Looking northwest from Frontier Elementary School at sidewalk terminating along the east side of SR 43.



35. Looking north from the SR 43 / West 9th Street Intersection at roadway and adjacent landscape, including Frontier Elementary School.



36. Looking south from the SR 43 / West 9th Street Intersection at roadway and adjacent landscape.



37. Looking north from the SR 43 / West 10th Street Intersection at existing sidewalk and curb ramp along the west side of SR 43.



38. Looking south from the SR 43 / West 10th Street Intersection at termination of existing sidewalk and curb ramp along the west side of SR 43.



39. Looking north along the west side of SR 43 at adjacent landscape.



40. Looking north along the east side of SR 43 at adjacent landscape.



41. Looking south along the east side of SR 43 at a small driveway pipe and adjacent landscape.



42. Looking north from the southern project terminus at roadway and adjacent landscape.



43. Looking south from the southern project terminus at the Moots Creek Bridge approach demarcating the southern project terminus.