Appendix B: Early Coordination

- Early Coordination Request Letter and Mailing List April 29, 2016
- Early Coordination Responses
- Re-Coordination Letter October 16, 2017

April 29, 2016

Example Early Coordination Letter

Re: Des. No. 1382612 Heavy Haul Transportation Corridor Port of Indiana – Jeffersonville to SR 265 Utica Township, Clark County, Indiana Project No. 2013.01857

Dear Ms. Hardisty:

The Indiana Department of Transportation (INDOT), in partnership with the Federal Highway Administration (FHWA), the Indiana Economic Development Corporation, the Ports of Indiana, the Board of Commissioners of Clark County, the City of Jeffersonville Redevelopment Commission, and the River Ridge Development Authority (RRDA), is developing a federal-aid road project to improve connectivity for the Ports of Indiana-Jeffersonville (Port) with other regional transportation assets. The proposed project is located in Utica Township, Clark County, Indiana.

The area is located on the Jeffersonville and Charlestown USGS 7.5 Minute Quadrangle Maps in Tracts 6-7, 14-17, 24-27, 38-40, and 52-53 and is within the Louisville Metropolitan Planning Area (LMPA), which consists of nine counties in Kentucky (Jefferson, Oldham, Trimble, Henry, Shelby, Spencer, Nelson, Bullit and Meade) and four Indiana counties (Washington, Harrison, Floyd and Clark). Preliminary corridor studies have identified an approximately 1.3-mile wide corridor between the Port of Indiana, Jeffersonville and State Road (SR) 265 to establish roadway alignment alternatives for the project. The alternatives are currently being developed and evaluated within the project corridor based upon environmental studies and coordination. Various maps and aerial photographs are enclosed showing the area being investigated.

The project area has several major generators of traffic that consist primarily of heavy trucks or heavy haul vehicles. However, the road network in the area is primarily made of up of local facilities not designed to handle such vehicle loading. Heavy haul vehicles (often referred to as Michigan truck trains) are generally 60 feet or more in length with a gross vehicle weight of 134,000 pounds, as compared to Indiana legal load limits of 80,000 pounds gross vehicle weight. Heavy haul vehicles require the design of facilities to take into account the maximum weight of the heavy haul vehicles and the anticipated number of heavy haul vehicles utilizing the facility on a daily basis. The resulting difference between a facility designed to carry heavy haul vehicles and standard load trucks is often a significant difference in pavement thickness. Based on current and predicted rapid industrial and commercial development associated with the major traffic generators in the project area it is anticipated that truck traffic will increase by 129 percent over the next 20 years.

The need for the proposed project is due to the current and predicted rapid industrial and commercial development in the area that would result in a significant increase in volume of heavy haul vehicles mixing with local traffic. This growth, combined with the lack of connectivity and suitable roadways for heavy haul vehicles in the area, indicates a need for the proposed project. The purpose of the proposed project is to provide a route built specifically for heavy haul vehicles that provides continuous connection between the RRCC and the Port via the new SR 265/Old Salem Road interchange.

The proposed project corridor generally extends north from the Port to the SR 265/Old Salem Road interchange. The area is a combination of forest, open grass, industrial, and farmed areas. The forested areas are generally on steep slopes. Few existing roads are located within this area. The proposed project corridor is bounded by the SR 265 corridor at the northern project limits. Lentzier Creek and several tributaries are located within the project corridor.

The proposed project consists of the construction of a 3-lane road designed to "heavy haul" specifications. The proposed road would have a design speed of 35 miles per hour with two 12-foot travel lanes and one 11- to 12-foot auxiliary lane. The road would likely be constructed on new alignment at a total length of approximately 1.75 miles. While only three lanes would be constructed, right-of-way would be wide enough to allow for future expansion to five lanes if required by traffic demand.

A Red Flag Investigation has been conducted to identify potential infrastructure, water, mining, hazardous materials, cultural resources, and ecological resources that may impact or be impacted by the proposed project. Potential concerns and recommendations are listed below:

- Noting the potential location of the project within the karst region of Indiana, as defined by the Karst Memorandum of Understanding (Karst MOU), an investigation of karst features in the project corridor and determination of potential impacts will be conducted.
- Multiple water resources including National Wetland Inventory (NWI) wetlands and streams were mapped with the project corridor. A wetland delineation and waters investigation will be completed to identify resources within the project corridor.
- Coordination will be conducted with the Indiana Department of Natural Resources and the US Fish and Wildlife Service regarding the potential for threatened and endangered species in the proposed project area. The Gray Bat (*Myotis grisescens*), the Indiana Bat (*Myotis sodalis*), and the Northern Long-Eared Bat (*Myotis septentrionalis*) have all been identified as potentially occurring in or near the proposed project corridor.
- Two potential trails, Ohio River Greenway to Charlestown State Park and Porter Road Corridor, run through the proposed project area. Both are managed by the City of Jeffersonville. Appropriate coordination should occur with the City of Jeffersonville if work is proposed along either of these corridors.
- One natural gas pipeline, owned by Indiana Gas Co. Inc., crosses the proposed project area. Appropriate coordination should occur with the INDOT utilities coordinator if excavation is to occur in the area.
- Several potential hazardous materials sites were identified. Environmental Site Assessments will be conducted to further investigate several of these areas.
- Based on preliminary review of the State Historic Architectural and Archaeological Research Database (SHAARD) and the Clark County Interim Report, several historical sites and structures are located within or near the project corridor. A Historic Property Report and an Archaeology Report will be prepared for

the project. The Section 106 process will further investigate potential impacts to historic sites and structures.

This letter is part of the early coordination phase of the environmental review process. You are asked to review this information and provide any comments you may have relative to anticipated impacts of the project on areas in which you have jurisdiction or special expertise. We will incorporate your comments into a study of the project's environmental impacts. To facilitate the development of this project, you are asked to reply within 30 days of receipt of this letter. If no response is received by that date, it will be assumed you have no comments at the present time.

Your timely cooperation in the development of this project is appreciated. For general inquiries please contact myself at (317) 234-4916 or by e-mail at <u>rbales@indot.in.gov</u> or Michelle Allen of FHWA at (317) 226-7344 or by e-mail at <u>michelle.allen@dot.gov</u>. However, please contact our consultant, Leah Boits of American Structurepoint at (317) 547-5580 or by e-mail at <u>lboits@structurepoint.com</u> for coordination purposes, questions, or if additional information is needed.

Respectfully,

Kon Bh

Ron Bales Environmental Policy Manager Indiana Department of Transportation

Enclosures

State Location Map USGS Topographic Mapping 2014 Aerial Photography Red Flag Investigation Infrastructure Map Red Flag Investigation Water Resources Map Red Flag Investigation Mining/Mineral Exploration Map Red Flag Investigation Hazardous Material Concerns Map Early Coordination Distribution List

State Location map found in Appendix B

Early Coordination Mailing List

Project Name:	Transportation Corridor
Route/Street:	New Alignment
DES No:	1382612
Location:	Utica Township, Clark County, Indiana
ASI Project No:	2013.01857

Salu	Name	Title	Attn:	Agency/Company	Address 1	Address 2	City	State	Zip	Delivery Method
Mr. Pruitt	Mr. Scott Pruitt	Field Supervisor		US Fish and Wildlife Service	Bloomington Field Office	620 South Walker Street	Bloomington	Indiana	47403-2121	Email
Ms. Hardisty	Ms. Jane Hardisty	State Conservationist		US Natural Resources Conservation Service	6103 Lakeside Boulevard		Indianapolis	Indiana	46278	Mail
Ms. Hasenmueller	Ms. Nancy Hasenmueller	Head		Indiana Geological Survey	Environmental Geology Section					Email
Mr. Kinder	Mr. James Kinder	Chief Airport Inspector		Indiana Department of Transportation	Office of Aviation					Email
Sir or Madam			Regional Environmental Coordinator	Midwest Regional Office	National Park Service	601 Riverfront Drive	Omaha	Nebraska	68102	Mail
Mr. Marquis	Mr. Rich Marquis	Division Administrator	Michelle Allen	Federal Highway Administration	Federal Office Building Room 254	575 North Pennsylvania Street	Indianapolis	Indiana	46204	Email
Mr. Clark	Mr. Cameron F. Clark	Director	Christie Stanifer, Environmental Review Coordinator	Indiana Dept. of Natural Resources, Division of Fish and Wildlife	273 Government Center West	402 West Washington Street	Indianapolis	Indiana	46204	Email
Sir or Madam		Field Environmental Officer		Chicago Regional Office, US Department of Housing and Urban Development	Metcalfe Federal Building	77 West Jackson Boulevard, Room 2401	Chicago	Illinois	60604	Mail
				Indiana Department of Environmental Management						Online Form
				Indiana Department of Environmental Management						Online Locator
Mr. Sullivan	Mr. Jim Sullivan	Chief, Groundwater Section		Indiana Department of Environmental Management		100 North Senate Avenue	Indianapolis	Indiana	46204	Mail
Mr. Bales	Mr. Ron Bales	Environmental Policy Manager		INDOT Environmental Services	642 Government Center North	100 North Senate Avenue	Indianapolis	Indiana	46204	Email
Mr. Clark	Mr. Rickie Clark	Manager, Public Hearings		Indiana Department of Transportation	100 North Senate Avenue, Room 642		Indianapolis	Indiana	46204	Email

Early Coordination Mailing List

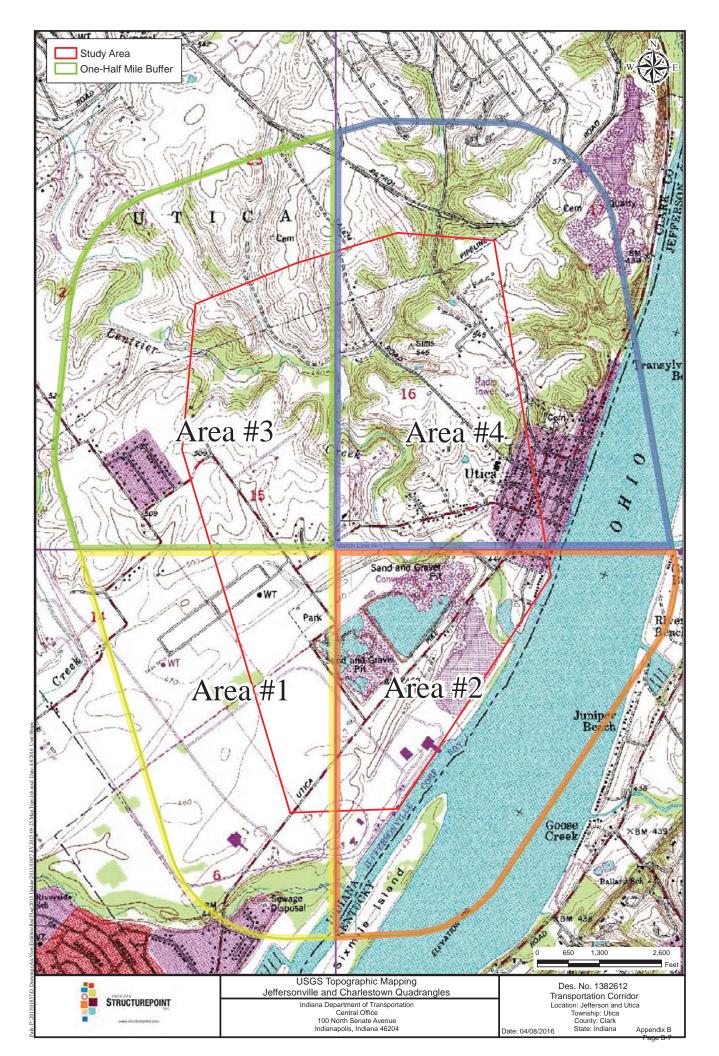
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Route/Street:	New Alignment
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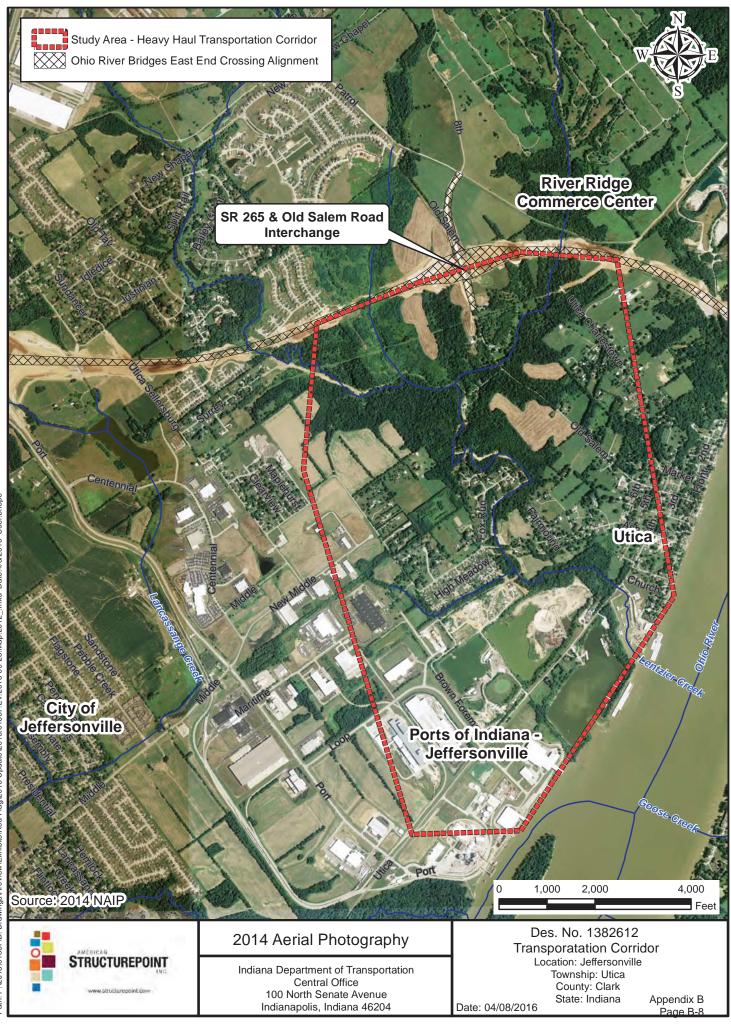
Salu	Name	Title	Attn:	Agency/Company	Address 1	Address 2	City	State	Zip	Delivery Method
Mr. Dye	Mr. David Dye	Environmental Scoping Manager		INDOT Seymour District Office		185 Agrico Lane	Seymour	Indiana	47274	Email
Ms. Glossa	Ms. Melany Glossa	Forest Supervisor		Hoosier National Forest	US Forest Service	811 Constitution Avenue	Bedford	Indiana	47421	Mail
Sir or Madam		Chief, Environmental Resources	CEPMP-P-E	Department of the Army	Louisville District, Corps of Engineers	P.O. Box 59	Louisville	Kentucky	40201-0059	Mail
Sir or Madam		Chief, Bridge Program Section		Eighth Coast Guard District		1222 Spruce Street	St. Louis	Missouri	63103-2832	Mail
Mr. Crouch	Mr. Andy Crouch	City Engineer		City of Jeffersonville	500 Quartermaster Court		Jeffersonville	Indiana	47130	Mail
Ms. Wahle	Ms. Jennifer Wahle			Kentuckiana Regional Planning and Development Agency	11520 Commonwealth Drive		Louisville	Kentucky	40299	Mail
Mr. Dixon	Mr. Brian Dixon	Highway Engineer		Clark County Highway Department	Clark County Government Building	501 East Court Avenue, Room 404	Jeffersonville	Indiana	47130	Mail
Mr. Moore	Mr. Mike Moore	Mayor		City of Jeffersonville	City Hall, Suite 250	500 Quartermaster Court	Jeffersonville	Indiana	47130	Mail
Mr. Dorman	Mr. Hank Dorman	President		Utica Town Board	726 Utica Charlestown Road		Utica	Indiana	47130	Mail
Mr. Waiz	Mr. Rob Waiz	Director		Jeffersonville Department of Economic Development and Department of Redevelopment	City Hall, Suite 257	500 Quartermaster Court	Jeffersonville	Indiana	47130	Mail
Mr. Corbin	Mr. Shane Corbin	Director		Jeffersonville Department of Planning and Zoning	City Hall, Suite 200	500 Quartermaster Court	Jeffersonville	Indiana	47130	Mail
Mr. Kavanaugh	Mr. Kenny Kavanaugh	Chief of Police		Jeffersonville Police Department	2218 East 10th Street		Jeffersonville	Indiana	47130	Mail

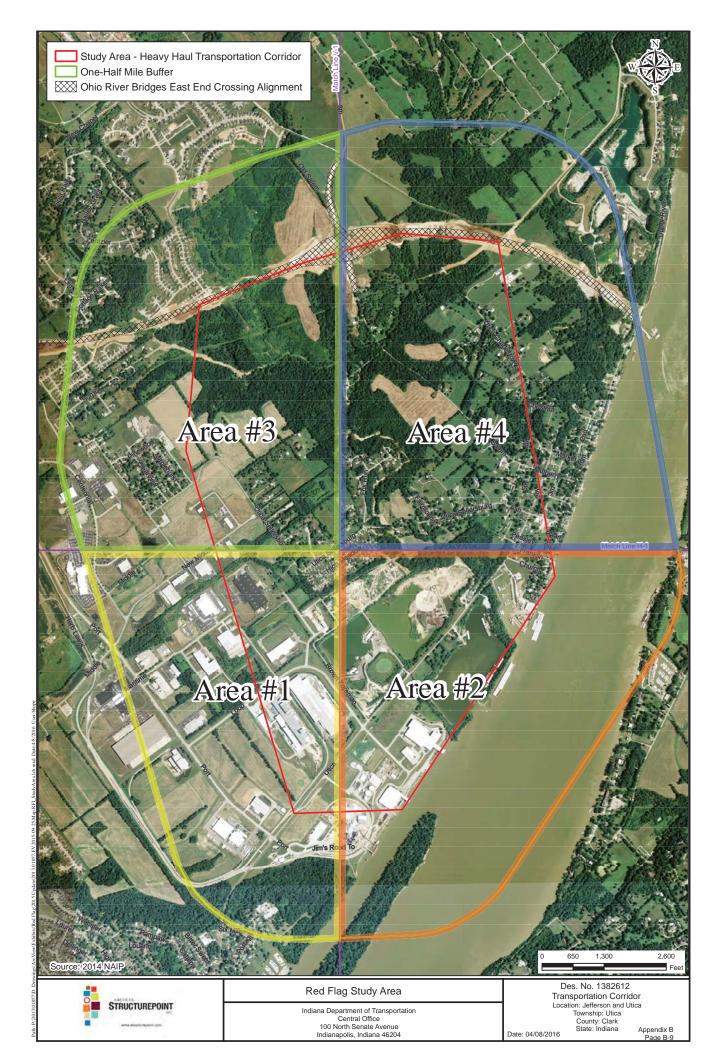
Early Coordination Mailing List

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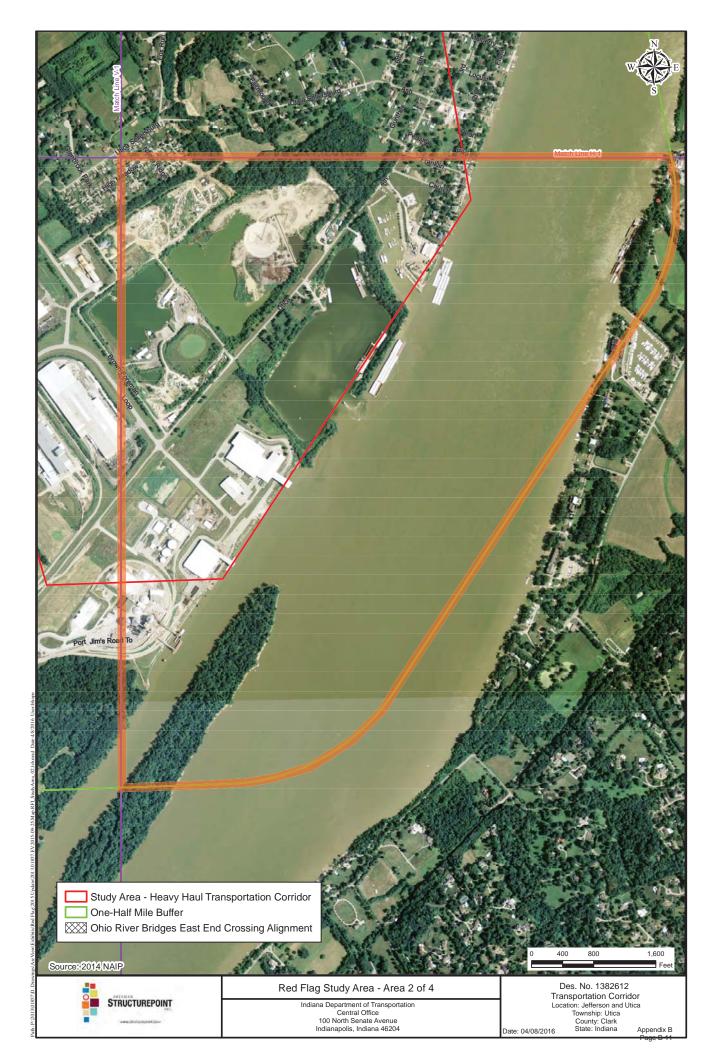
Salu	Name	Title	Attn:	Agency/Company	Address 1	Address 2	City	State	Zip	Delivery Method
Sir or Madam				Jeffersonville Storm Water Department	500 Quartermaster Court		Jeffersonville	Indiana	47130	Mail
Ms. Dant Chesser	Ms. Wendy Dant Chesser	President and CEO		One Southern Indiana	4100 Charlestown Road		New Albany	Indiana	47150	Mail
Mr. Acy	Mr. Jerry Acy	Executive Director		River Ridge Commerce Center	6200 East Highway 62	Suite 600	Jeffersonville	Indiana	47130	Mail
Dr. Melin	Dr. Andrew Melin	Superintendent		Greater Clark County Schools	2112 Utica- Sellersburg Road		Jeffersonville	Indiana	47130	Mail
Ms. Gilland	Ms. Kathy Gilland	Principal		Utica Elementary School	210 Maplehurst Drive		Jeffersonville	Indiana	47130	Mail
Mr. Noel	Mr. Jamey Noel	Sheriff		Clark County Sheriff's Office	501 East Court Avenue		Jeffersonville	Indiana	47130	Mail
Mr. Blankenbeker	Mr. David Blankenbeker	Surveyor		Clark County Surveyor's Office	Clark County Government Building	501 East Court Avenue, Room 421	Jeffersonville	Indiana	47130	Mail
Mr. Killen	Mr. Mike Killen	President		Clark County Drainage Board	Clark County Government Building	501 East Court Avenue, Room 421	Jeffersonville	Indiana	47130	Mail
Mr. Stewart	Mr. Scott Stewart	Port Director		Port of Indiana - Jeffersonville	1402 Port Road		Jeffersonville	Indiana	47130	Mail
Ms. Fisher	Ms. Pamela Fisher	Director, Regulatory Affairs		Indiana Economic Development Corporation	One North Capitol, Suite 700		Indianapolis	Indiana	46204	Mail
Mr. Kavanaugh	Mr. Les Kavanaugh	Director		Clark County Emergency Management Agency	110 North Indiana Avenue		Sellersburg	Indiana	47172	Mail
Ms. Ostby	Ms. Susan Ostby			DNR Outdoor Recreation	402 West Washington Street	Room 271W	Indianapolis	Indiana	46204	Mail
				Clark County Board of	501 East Court		* 00 ***			
Mr. Coffman	Mr. Jack Coffman	President		Commissioners	Avenue 501 East Court		Jeffersonville	Indiana	47130	Mail
Ms. Hollis	Ms. Barbara Hollis	Council President		Clark County Council	Avenue		Jeffersonville	Indiana	47130	Mail
Mr. Northam	Mr. Paul Northam	Director	ordination\2013 015	City of Jeffersonville Parks Department 57.EV.2015-09-28.Dat.EC_M	500 Quartermaster Court		Jeffersonville	Indiana	47130	Appendix B Page B-6 Mail

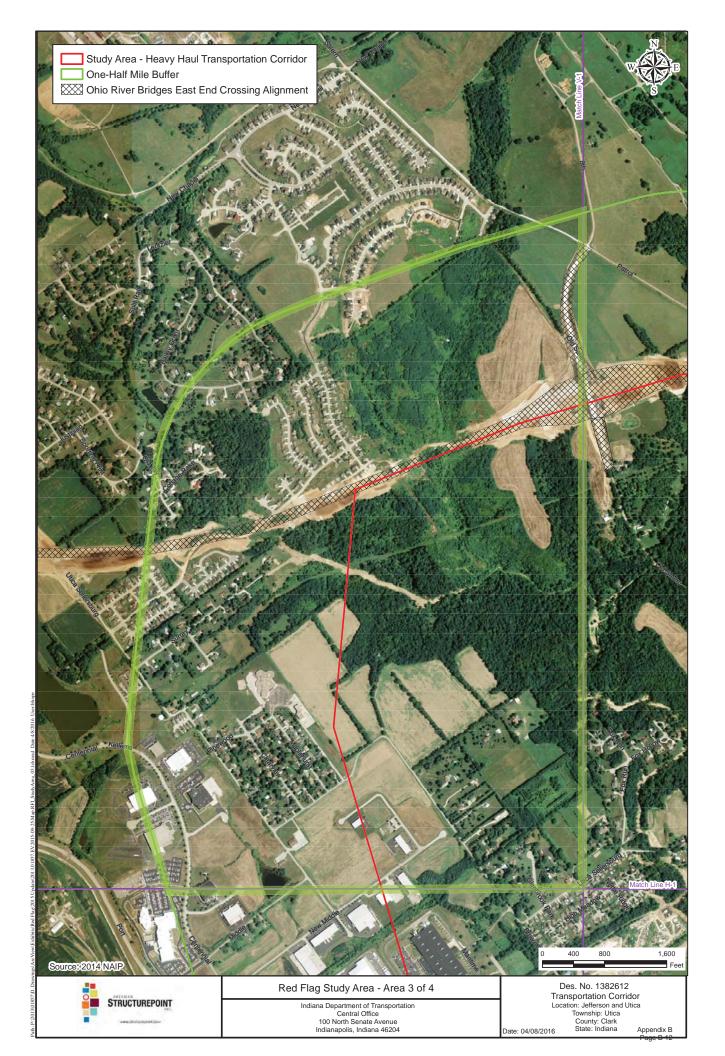




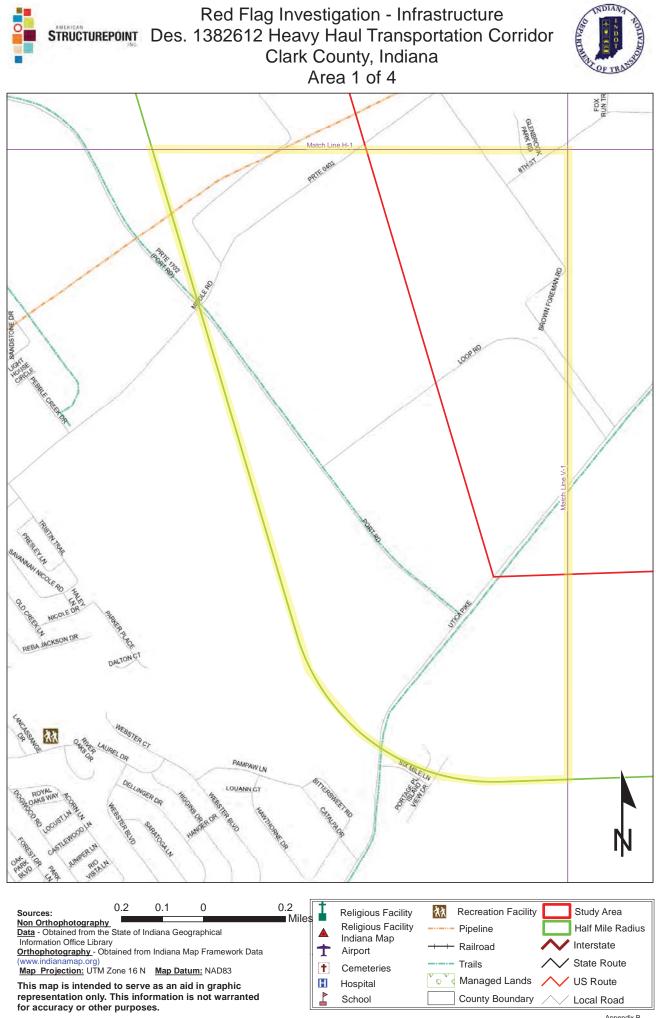


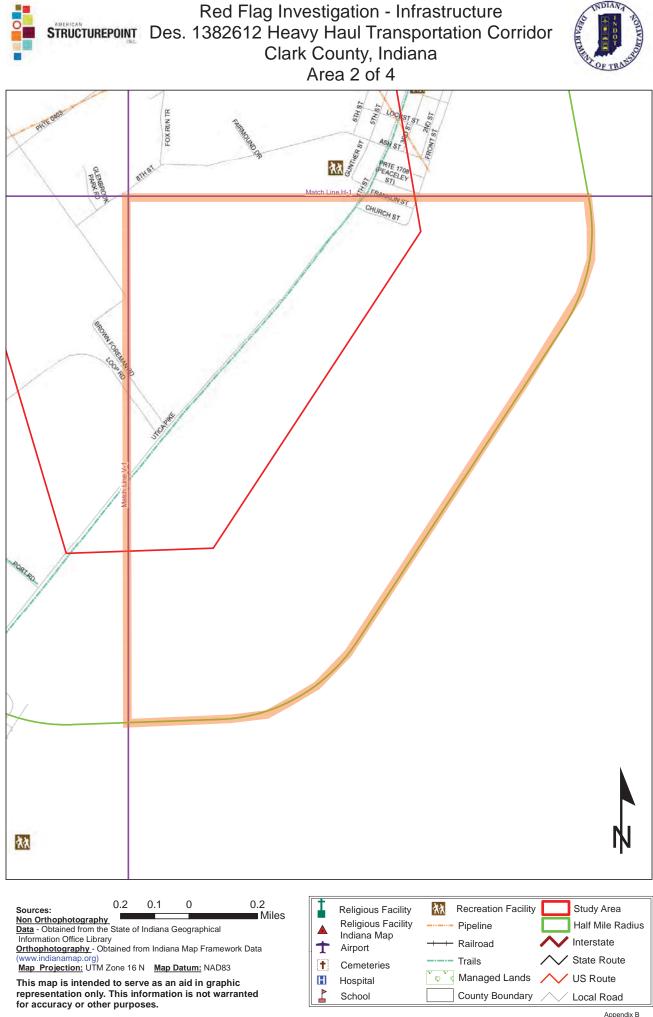


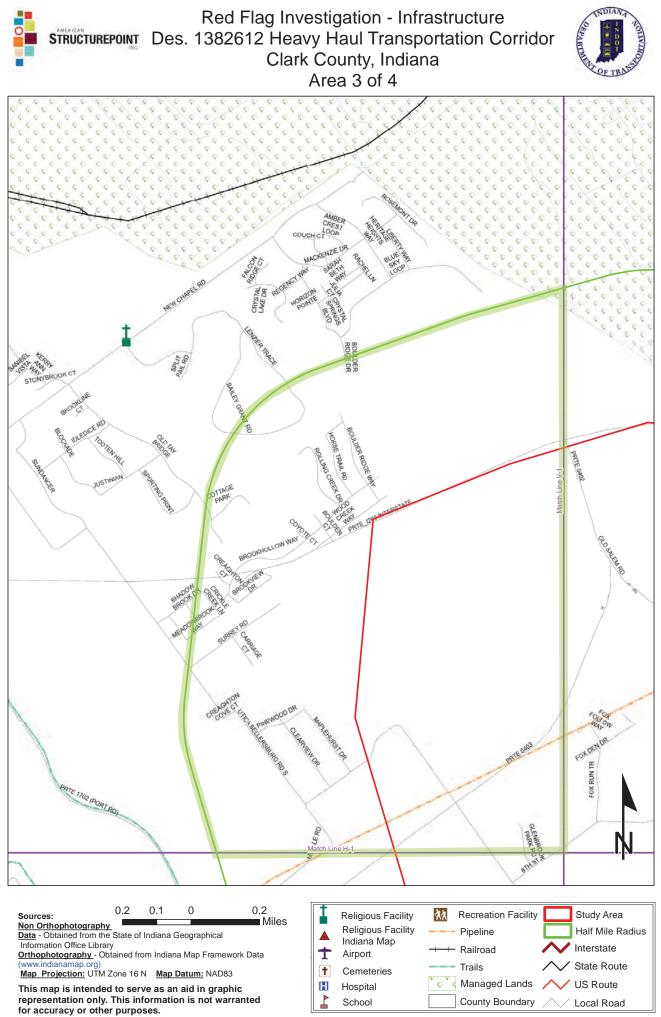


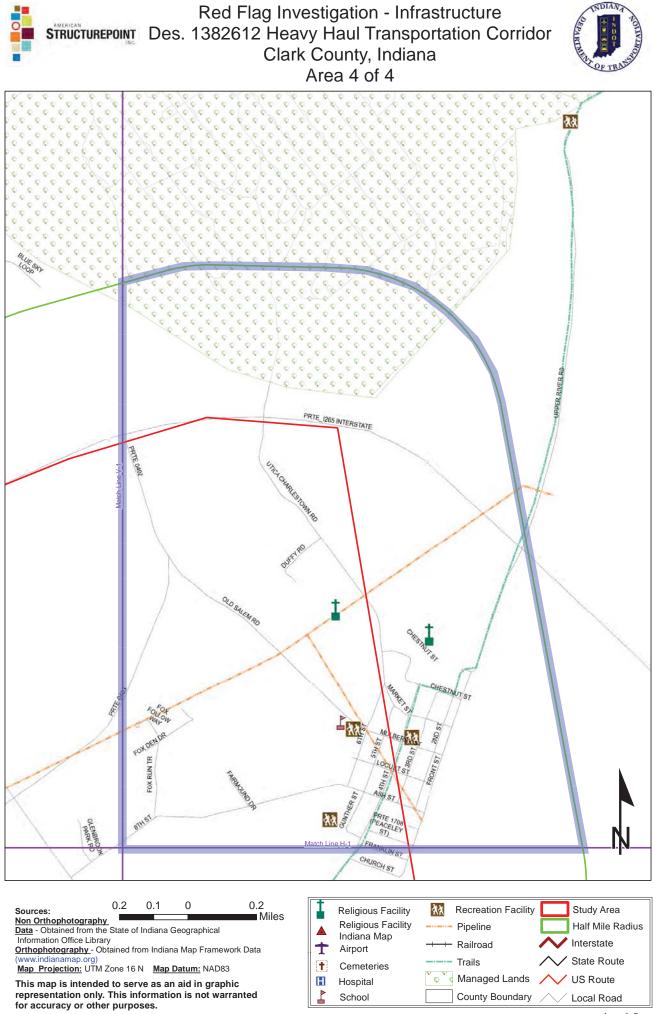


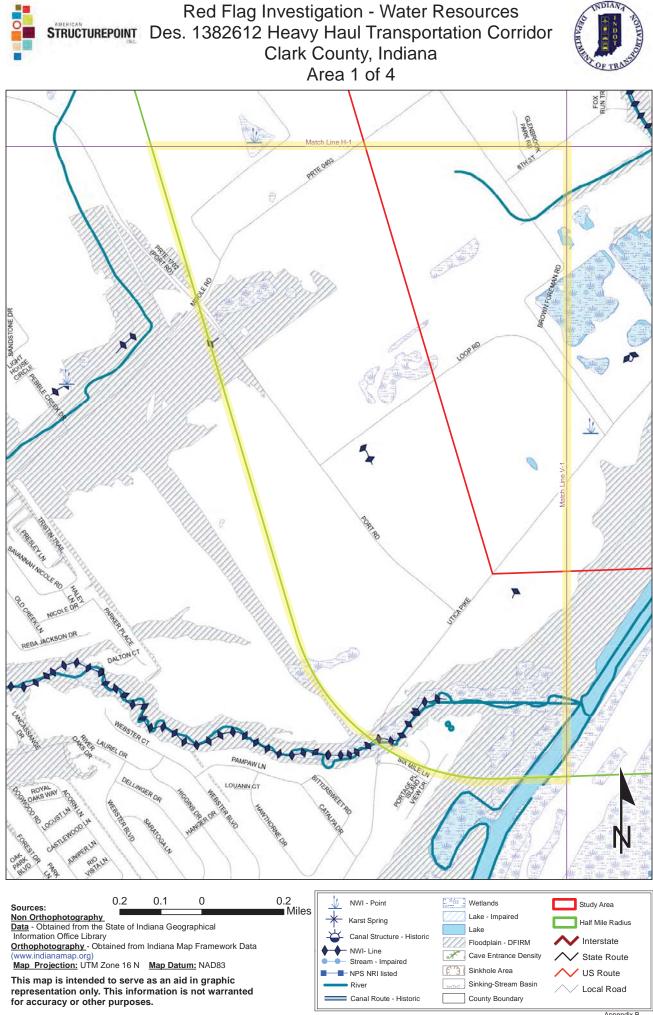


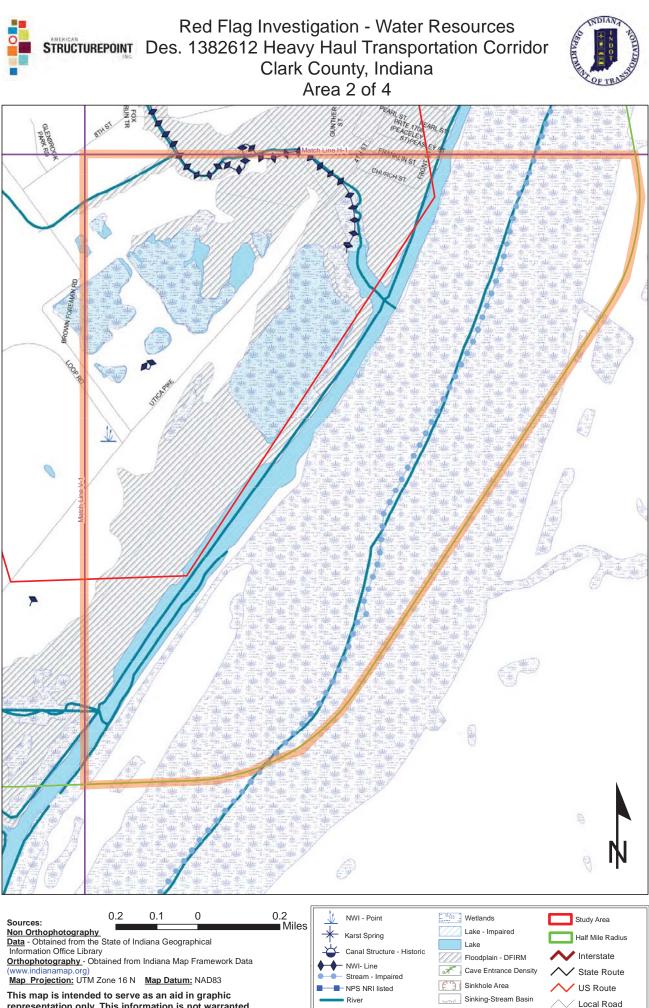










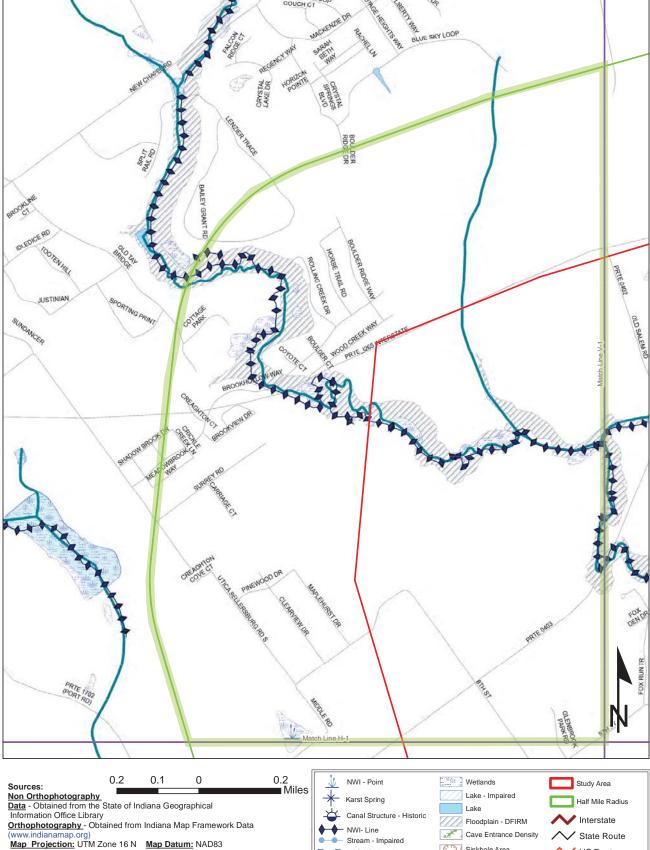


Canal Route - Historic

County Boundary

representation only. This information is not warranted for accuracy or other purposes.





This map is intended to serve as an aid in graphic

for accuracy or other purposes.

representation only. This information is not warranted

- NPS NRI listed

Canal Route - Historic

River

V US Route

Local Road

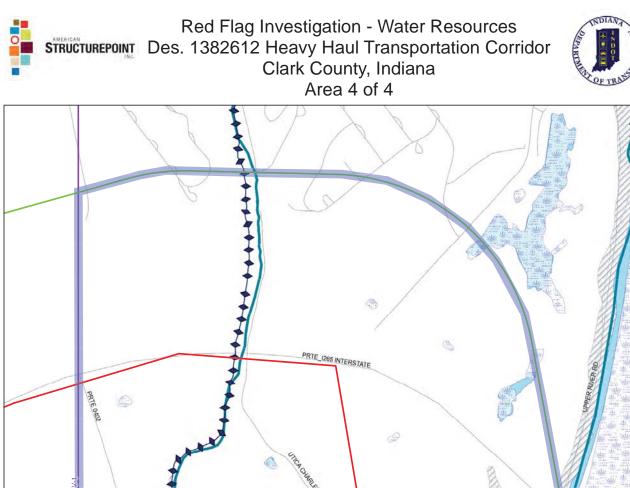
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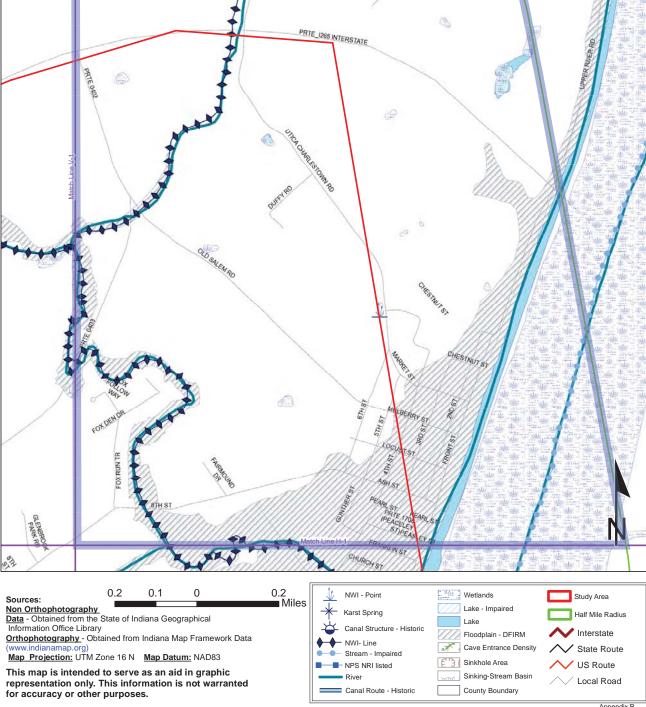
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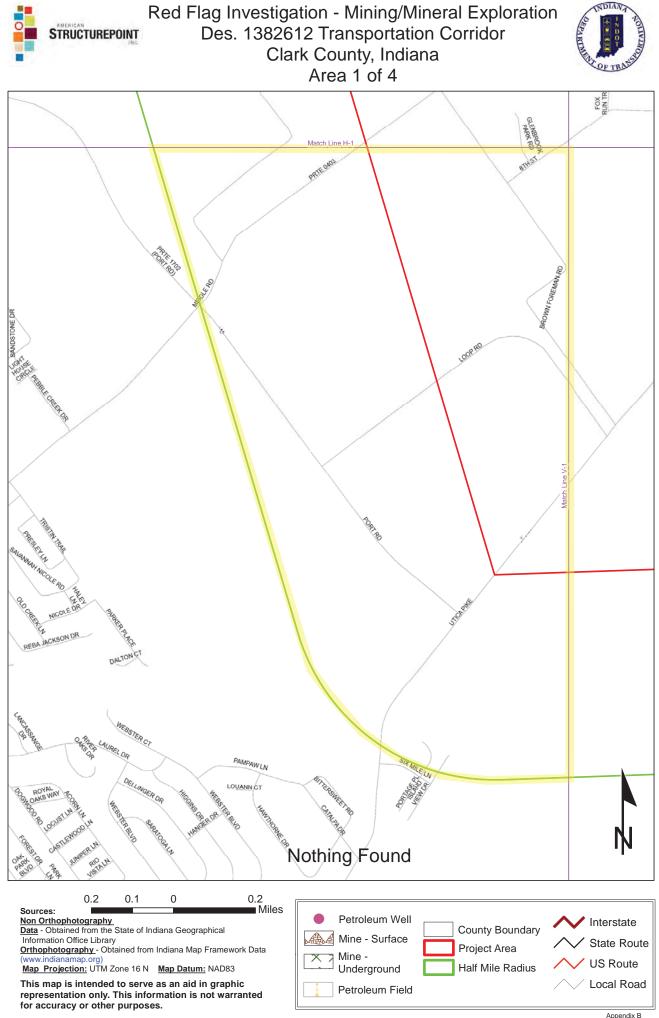
Sinkhole Area

County Boundary

Sinking-Stream Basin

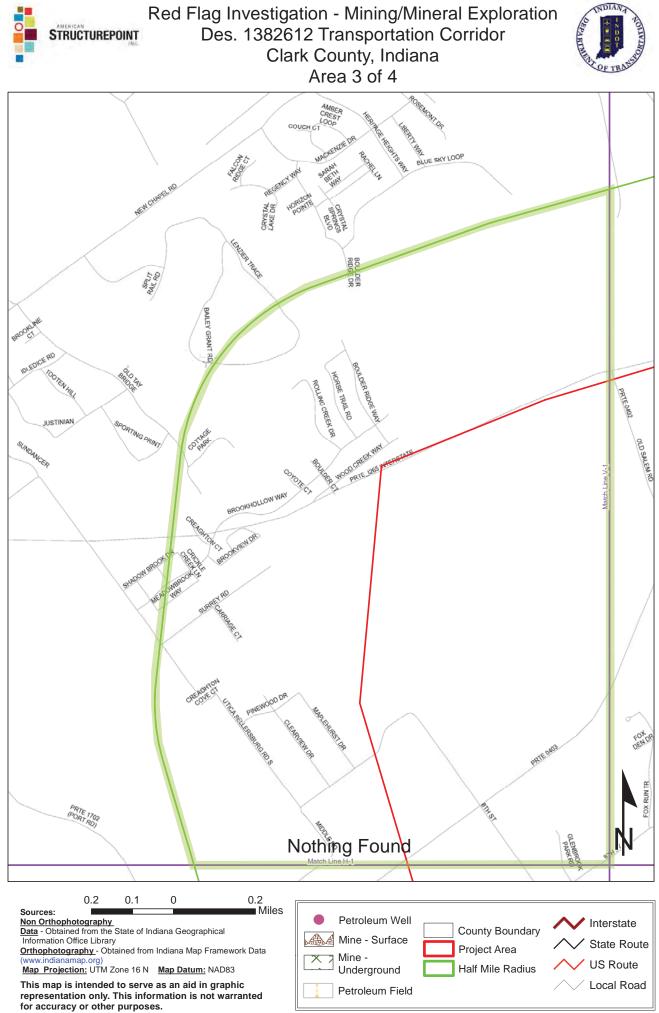




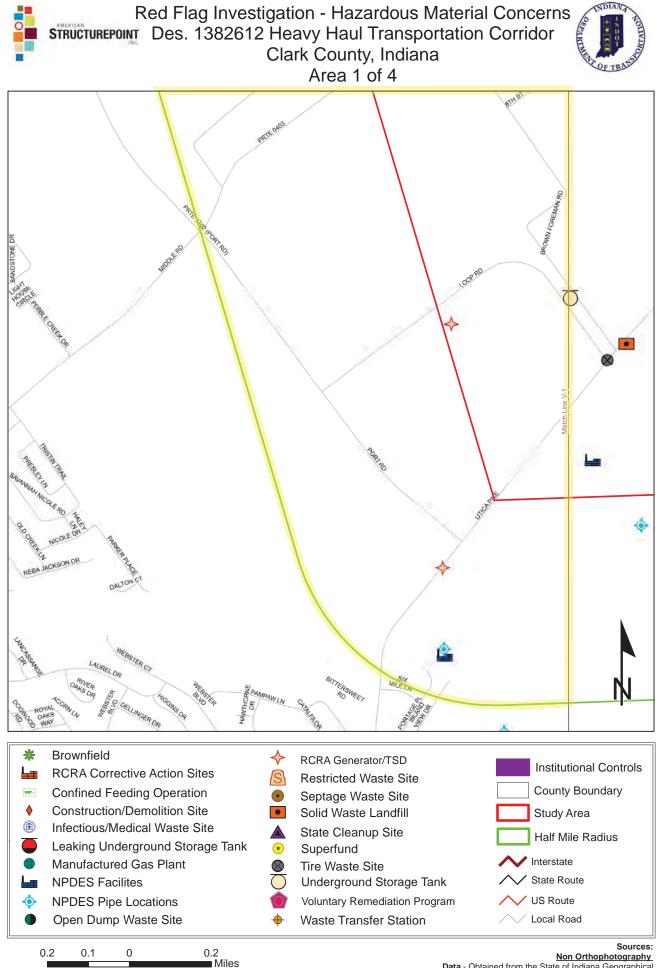


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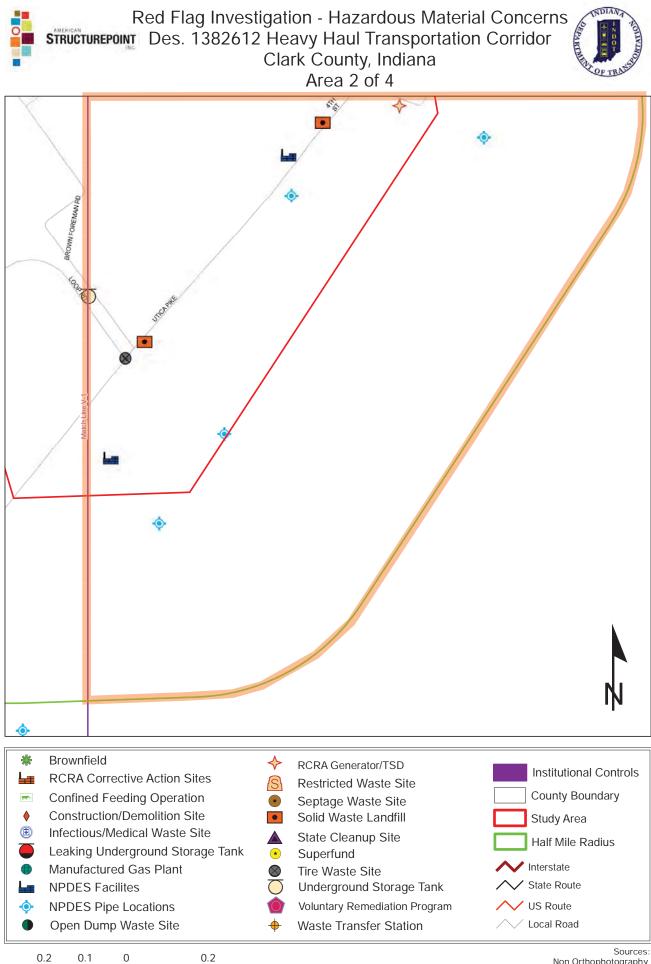






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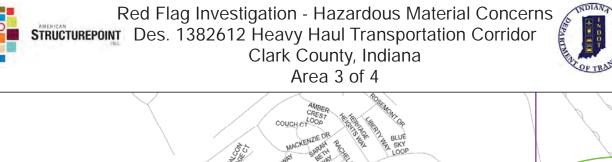
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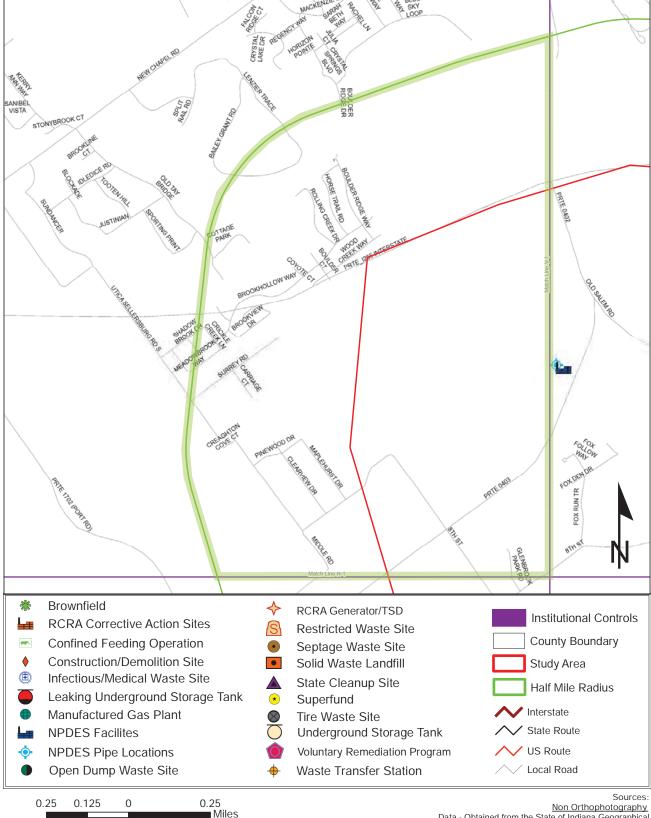


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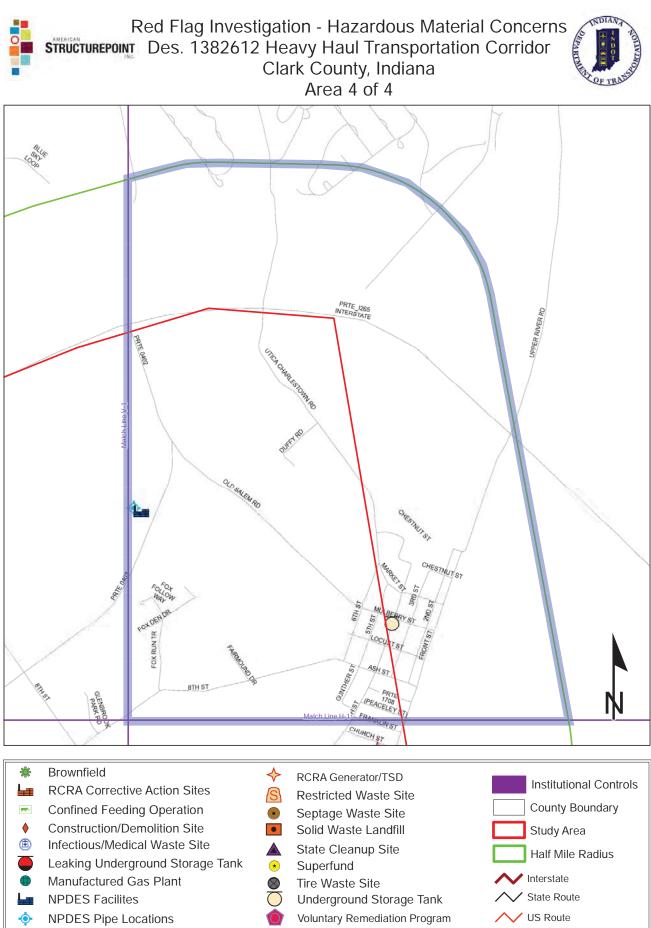
Miles

Sources: <u>Non Orthophotography</u> <u>Data</u> - Obtained from the State of Indiana Geographical Information Office Library <u>Orthophotography</u> - Obtained from Indiana Map Framework Data (www.indianamap.org) <u>Map Projection:</u> UTM Zone 16 N <u>Map Datum</u>; NAD83 Appendix B Page B-27





This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes. Non Orthophotography Data - Obtained from the State of Indiana Geographical Information Office Library Orthophotography - Obtained from Indiana Map Framework Data (www.indianamap.org) Map Projection: UTM Zone 16 N Map Datum: NAD83



Waste Transfer Station

Open Dump Waste Site

0.125

0.25

Sources:

This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

0

0.25

Miles

Non Orthophotography Data - Obtained from the State of Indiana Geographical Information Office Library Orthophotography - Obtained from Indiana Map Framework Data (www.indianamap.org) Map Projection: UTM Zone 16 N Map Datum: NAD83 Appendix B Page 8-29

Local Road

Project No.	2013.01857	Des. No.	1382612
0	Heavy Haul Transportation Co	orridor	

Name of Organization requesting early coordination:

American Structurepoint, Inc.

QUESTIONNAIRE FOR THE INDIANA GEOLOGICAL SURVEY

Do unusual and/or problem () geographic, (X) geological, () geophysical, or
 () topographic features exist within the project limits? Describe:

This is a potential problem. The letter describing this project notes that karst is a potential problem. Karst sink holes have been mapped within the project area (see "Karst Sinkhole Inventory" layer on the Indiana Map at <u>http://maps.indiana.edu/</u>).

- 2) Have existing or potential mineral resources been identified in this area? Describe: This is a potential problem. All of the project area is underlain by Silurian carbonate rocks and about one third of the area (higher elevations in northern part of project area) is underlain by Devonian carbonate rocks. These rocks have been mined elsewhere as a source of crushed-stone and are a potential mineral resource within the project area.
- 3) Are there any active or abandoned mineral resources extraction sites located nearby? Describe: <u>This is probably not a problem. An abandoned quarry pit extends into the northeast</u> corner of Area 4. Two other small, abandoned quarries are located in Area 4. A flooded, abandoned sand and gravel pit is located in the northwest corner of Area 2.

This information was furnished by:

Name:	Walter A. Hasenmueller, LPG IN816	_ Title <u>: Geologist</u>	
Address:	611 North Walnut Grove, Bloomington, IN 47405		
	312-855-7428	Date: May 5, 2016	



United States Department of Agriculture

Natural Resources Conservation Service Indiana State Office 6013 Lakeside Boulevard Indianapolis, IN 46278 317-290-3200

May 13, 2016

Ronald E. Bales Manager, Environmental Policy Office Environmental Services Division Indiana Department of Transportation 100 North Senate Avenue, Room N642 Indianapolis, Indiana 46278

Dear Mr. Bales:

A determination for the proposed Heavy Haul Transportation Corridor project from Port of Indiana – Jeffersonville to State Road 265 in the Utica Township, Clark County, Indiana, as referred to in your letter received April 29, 2016 cannot be made at this time. Please resubmit when routes are available.

If you need additional information, please contact Rick Neilson at 317-295-5875.

Sincerely,

Jane F. Hudsly

JANE E. HARDISTY State Conservationist

Enclosures

Helping People Help the Land.

USDA is an equal opportunity provider and employer.

Appendix B Page B-31 U.S. Department of Homeland Security

United States Coast Guard



Commander Eighth Coast Guard District 1222 Spruce Street, Room 2.102D St. Louis, MO 63103-2832 Staff Symbol: dwb Phone: (314) 269-2434 Fax: (314) 269-2379 Email: allan.o.monterroza@uscg.mil www.uscg.mil/d8/westernriversbridges

16591.6 May 13, 2016

Mr. Ron Bales Environmental Policy Manager Indiana Department of Transportation 100 North Senate Avenue, Room N642 Indianapolis, IN 46204

Subj: DES. NO. 1382612, HEAVY HAUL TRANSPORTATION CORRIDOR, PORT OF INDIANA – JEFFERSONVILLE TO SR 265, UTICA TOWNSHIP, CLARK COUNTY, INDIANA, PROJECT NO. 2013.01857

Dear Mr. Bales:

We have reviewed the information in your letter dated April 29, 2016 and determined that this project does not include a bridge crossing over water. Therefore the Coast Guard has no interest in the project.

If there are any questions, please contact Mr. Allan Monterroza at the above listed number. We appreciate the opportunity to comment on the project.

Sincerely,

ERIC A. WASHBURN Bridge Administrator, Western Rivers By direction of the District Commander

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o, meas an sity quements, please contact Mr. Allon Monteriote their accounted mut can be a an an and the interfacement to remark on the restant.

Questionnaire for the Indiana Department of Transportation, Office of Aviation

Job No. Des/Bridge No: 1382612

Project Description:

Heavy Haul Transportation Corridor Port Of Indiana,

Jeffersonville to Utica Township, Clark County, Indiana

Requested By: STRUCTUREPOINT

Are there any existing or proposed airports within or near the project limits? YES

If yes, describe any potential conflicts with air traffic during or after the construction of the project.

The Clark County Municipal Airport <i>is located 11,000'West of the</i>
project. If any permanent structures or equipment utilized for
the project penetrates the 100:1 slope from the airport FAA
Form 7460 (Notice of Proposed contstruction or alteration) must
be filed. For assistance contact Adam French, INDOT Office of
Aviation, 317-232-1477.

This information was furnished by:

Name:	James W. Kinder
Title:	Chief Airport Inspector – INDOT Office of Aviation
Date:	May 18, 2016

United States Department of the Interior Fish and Wildlife Service

Bloomington Field Office (ES) 620 South Walker Street Bloomington, IN 47403-2121 Phone: (812) 334-4261 Fax: (812) 334-4273



June 2, 2016

Mr. Ron Bales Indiana Department of Transportation 100 North Senate Avenue Room N642 Indianapolis, Indiana 46204

Des. No. 1382612 Heavy Haul Transportation Corridor Port of Indiana – Jeffersonville to SR 265 (Crossing Lentzier Creek) Utica Township, Clark County, Indiana Project No. 2013.01857

Dear Mr. Bales:

This responds to your letter dated April 29, 2016 requesting U.S. Fish and Wildlife Service (FWS) comments on the aforementioned project. The FWS also attended an agency meeting on May 26, 2016 to further discuss the project.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, as amended, and the U.S. Fish and Wildlife Service's Mitigation Policy.

The proposed project consists of the construction of a 3-lane road designed to "heavy haul" specifications. The proposed road would have a design speed of 35 miles per hour with two 12-foot travel lanes and one 11- to 12- foot auxiliary lane. The road would likely be constructed on new alignment at a total length of approximately 1.75 miles. While only three lanes would be constructed, right-of-way would be wide enough to allow for future expansion to five lanes if required by traffic demand. Recent discussions have indicated that the road corridor could be up to 500 feet wide and potentially remove 40-50 acres of forest, depending on the alignment chosen. Various alternatives are currently being developed along with a matrix to compare and evaluate the different alternatives and their impacts. This information will be necessary for us to fully evaluate each alternative.

The surrounding land use is a combination of forest, open grass, industrial, and farmed areas. The forested areas are generally on steep slopes. The proposed project corridor is bounded by the new SR 265 corridor to the north and the Ohio River to the south. Lentzier Creek and several tributaries are located within the project corridor. Depending on which alternative is selected, the project could significantly impact local fish and wildlife resources.

KARST RESOURCES

The proposed project is in an area of karst geologic features, which often support unique subterranean ecosystems. Previous studies have found unique cave fauna in some of the caves in the Jeffersonville area, and a gray bat colony had been shown to use karst resources on the former Indiana Army Ammunition Plant. We recommend that a survey for karst features in the surrounding terrain be performed. Although this area is not within the designated karst area of the state, we encourage INDOT to follow the protocols and procedures outlined in the 1993 Memorandum of Understanding for construction of transportation projects in karst areas if any karst features are identified.

ENDANGERED SPECIES

The proposed project is within the range of the federally endangered Indiana bat (*Myotis sodalis*) and gray bat (*Myotis grisescens*), and the federally threatened northern long-eared bat (*Myotis septentrionalis*) (NLEB).

Indiana bats hibernate in caves then disperse to reproduce and forage in relatively undisturbed forested areas associated with water resources during spring and summer. Recent research has shown that they will inhabit fragmented landscapes with adequate forest for roosting and foraging. Young are raised in nursery colony roosts in trees, typically near drainageways in undeveloped areas. Like all other bat species in Indiana, the Indiana bat diet consists exclusively of insects. There are records of the Indiana bat in Clark County and there is suitable summer habitat for this species present throughout the area surrounding the project site.

Gray bats inhabit caves year-around and migrate between winter hibernation caves and summer cave roosts for reproduction and foraging. Preferred foraging habitat is along wooded stream corridors and the forage base often includes a high proportion of aquatic insects. There is one significant summer maternity colony known in Indiana, in southern Clark County. Previous studies have shown that its main foraging habitat is along Silver Creek and Muddy Fork, but it has also been documented foraging on Lancassange Creek and on streams in the former INAAP property. There are also records just across the Ohio River in Kentucky.

Based on the information provided, there is the potential for impacts to the foraging habitat of the gray bat.

The northern long-eared bat was recently listed as threatened under the Endangered Species Act (ESA) (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*). At this time, no critical habitat has been proposed for the NLEB. The entire state of Indiana is within the known range of the NLEB.

During the summer, NLEBs typically roost singly or in colonies in cavities, underneath bark, crevices, or hollows of both live and dead trees and/or snags (typically \geq 3 inches dbh). Males and non-reproductive females may also roost in cooler places, like caves and mines. This bat seems opportunistic in selecting roosts, using tree species based on presence of cavities or crevices or presence of peeling bark. It has also been occasionally found roosting in structures like barns and sheds (particularly when suitable tree roosts are unavailable). They forage for insects in upland and lowland woodlots and tree lined corridors. During the winter, NLEBs predominately hibernate in caves and abandoned mine portals. Additional habitat types may be identified as new information is obtained. The northern long-eared bat is considered extant in Clark County.

This endangered species information is provided for technical assistance only, and does not fulfill the requirements of Section 7 of the Endangered Species Act. Depending on the alignment selected, a bat survey may be necessary to determine impacts to threatened and endangered species. Specific avoidance and minimization measures for T&E species would be developed based on survey results.

ADDITIONAL RECOMMENDATIONS

Land use in the project area consists of forest areas, agricultural, industrial, and some scattered residential areas. Lentzier Creek and a couple of its tributaries will likely be crossed by the project. The NWI data indicate the presence of wetlands within the project area, near the midway point; these are generally associated with the Lentzier Creek drainage. Wetland and stream impacts should be avoided as much as possible, and any unavoidable impacts should be compensated for in accordance with the Corps of Engineers mitigation guidelines.

Based on a review of the plans you provided, we recommend the following general mitigation measures be included in the final project plans in order to minimize adverse impacts on fish and wildlife resources:

- 1. Depending on the size and flow of the various waterways, avoid channel work during the fish spawning season (April 1 through June 30).
- 2. Restrict channel work and vegetation clearing to the minimum necessary for installation of any structures and roadway.
- 3. If riprap is utilized for bank stabilization, extend it below low-water elevation to provide aquatic habitat.
- 4. Implement temporary erosion and siltation control devices such as placement of riprap check dams in drainage ways and ditches, installation of silt fences, covering exposed areas with erosion control materials, and grading slopes to retain runoff in basins.

- 5. Re-vegetate all disturbed soil areas immediately upon project completion, using native trees and shrubs in the riparian zone.
- 6. Minimize the extent of artificial bank stabilization and use bioengineering methods wherever feasible.
- 7. Culverts should span the active stream channel, should be either embedded or a 3-sided or open-arch culvert, and be installed where practicable on an essentially flat slope. When an open-bottomed culvert or arch is used in a stream, which has a good natural bottom substrate, such as gravel, cobbles and boulders, the existing substrate should be left undisturbed beneath the culvert to provide natural habitat for the aquatic community.
- 8. Post DO NOT DISTURB signs at the construction zone boundaries and do not clear trees or understory vegetation outside the boundaries.

OTHER CONSIDERATIONS

As was discussed in the agency meeting, we recommend that a Port Road upgrade/reconstruction be considered as a potential alternative during the screening process. An upgrade of an existing road could be more cost effective and would be less damaging to the surrounding natural and human environment.

If a permit under Section 404 of the Clean Water Act is needed for the proposed project, our recommendations to the U.S. Army Corps of engineers for permit conditions would be consistent with our comments here.

We appreciate the opportunity to comment at this early stage of project planning. If you have any questions about our recommendations, please call Robin McWilliams Munson at (812) 334-4261 (Ext. 1207).

Sincerely,

Scott E. Pruitt Field Supervisor

cc: Michelle Allen, Federal Highway Administration, Indianapolis, IN Leah Boits, American Structure Point, 7260 Shadeland Ave, Indianapolis, IN 46256

THIS IS NOT A PERMIT

State of Indiana DEPARTMENT OF NATURAL RESOURCES Division of Fish and Wildlife

Early Coordination/Environmental Assessment

DNR #:	ER-19026	Request Received: April 29, 2016		
Requestor:	American Stri Leah Boits 7260 Shadela Indianapolis,			
Project:		Heavy Haul Transportation Corridor, Port of Indiana, Jeffersonville to SR 265; Des #1382612; Project #2013.01857		
County/Site info:		Clark		
		The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.		
		If our agency has regulatory jurisdiction over the project, the recommendations contained in this letter may become requirements of any permit issued. If we do not have permitting authority, all recommendations are voluntary.		
Regulatory Assessment:		This proposal may require the formal approval of our agency pursuant to the Flood Control Act (IC 14-28-1) for any proposal to construct, excavate, or fill in or on the floodway of a stream or other flowing waterbody which has a drainage area greater that one square mile		
Natural Heritage Database:		The Natural Heritage Program's data have been checked. The state endangered osprey (Pandion haliaetus) has been documented within the project area. Also, the Charlestown Military Reservation, a US Department of Defense property, is within 1/2 mile north of the project area.		
Fish & Wildlife Comments:		There is an active osprey nest located within Area #2 of the proposed project area. These has been active the last three years. As an endangered and migratory bird species, osprey and their nests are protected and it is strongly recommended that construction activities do not occur during their nesting period, which is from March 2 through August 1.		
		1) Alternatives		
		Parts of the new-terrain road's alignment(s) will impact large areas of closed-canopy forest on steep to very steep hillsides. Stream impacts will be mainly to Lentzier Creek but headwater and unnamed tributaries to Lentzier Creek will be impacted by some of the alignment alternatives.		
		An alternative is needed that minimizes impacts to: -wetlands (forested, scrub-shrub and emergent); -non-wetland forest in the floodway and outside the floodway (also referred to as upland woods); -streams and floodway habitat		
		Minimization must also include minimizing fragmentation of these habitats. Alignments that minimize the construction footprint through forested habitat, the number of forested areas impacted, and the number of stream crossings are generally environmentally preferred.		
		Alternatives A1 and A2 will have wide right-of-way footprints in the UNT Lentzier Creek		

State of Indiana DEPARTMENT OF NATURAL RESOURCES Division of Fish and Wildlife

Early Coordination/Environmental Assessment

valley, where they are proposed on the Old Salem Road alignment. The alignments also cross Lentzier Creek itself in a forested part of the creek valley closer to the Ohio River. A1 and A2 will require significant cut-and-fill impacts in ascending to the ridge north of Utica-Sellersburg Road. These alignments are not environmentally-preferred and should not be carried forward.

Alternatives B and F have significant impacts to forested habitat due to the roadway ascending the valley along the north or south slope of a tributary to Lentzier Creek. Alternative B is more environmentally-acceptable than F, particulaly if MSE walls and wide conspan arches to cross creeks are included in the design. Alternative F is not environmentally-preferred and should not be carried forward in its current form, though modifications that reduce impacts could make this a potential alternative.

Alternative C has a wide right-of-way footprint for a longer distance than most other alignments as well as impacting a forested headwater tributary valley south of the Lentzier Creek valley. This alternative should not be carried forward.

Alternative D crosses three separate forested valleys and appears to have the widest footprint over the Lentzier valley. The right-of-way footprint appears to impact two springs in the Lentzier Creek valley. Alternative D could be carried forward but only with mitigation measures such as:

-MSE walls to reduce the footprint, rather cut and fill/berm methods; and -wide conspan crossings to minimize impacts to the creek and allow ample room for wildlife movement.

If carried forward, Alternative D should turn so it more closely aligns with Alternatives E or F at the south side of the valley in order to avoid crossing another forested headwater tributary valley.

Alternative E makes several wide turns throughout the valleys and will require more cut and fill (i.e. wider right-of-way impacts to forested habitat) than the other alignments. It also impacts one of the springs in the Lentzier Creek valley. Alternative E should not be carried forward unless impacts to forested habitat can be reduced.

Alternative G appears to have the most impacts as it crosses Lentzier Creek's channel two or three times, and crosses the valley along a forested tributary valley resulting in significant amounts of impacts to forested habitat. Alternative G follows Old Salem Road where it has a wide right-of-way footprint through the forested valley of UNT Lentzier Creek. Alternative G should not be carried forward.

All alternatives except A1-A2 impact a sinkhole near a tributary to Lentzier Creek west of Utica-Sellersburg Rd (south of New Middle Road) and several springs in the UNT Lentzier Creek valley west of Old Salem Road. The alignments should be modified to avoid such features. Due to the presence of sinkholes and springs along the alignments a karst assessment conducted by a qualified geologist with knowledge and experience in karst geology is recommended.

A multiple-span bridge/elevated roadway design could be combined with MSE walls to reduce right-of-way impacts when crossing forested valleys. If a multiple-span elevated roadway is not feasible then the road's footprint should be minimized through the use of MSE walls throughout the valley rather than cut/fill.

2) Botanical Resource Impacts and Mitigation

In addition to the project's direct impacts to closed-canopy forested habitat, the project will also result in substantial indirect impacts such as habitat fragmentation. Habitat loss and fragmentation are the main causes of the decline of wildlife. Habitat

State of Indiana DEPARTMENT OF NATURAL RESOURCES Division of Fish and Wildlife

Early Coordination/Environmental Assessment

fragmentation creates smaller, more isolated habitat areas of lower habitat value for wildlife as compared to large, contiguous habitats. Fragmentation allows non-native species and predators access to the forest interior which is vital habitat for many neotropical migratory songbird species and can negatively affect the long-term viability of wildlife populations with limited mobility.

Further habitat assessment studies are recommended to determine areas to avoid. A floristic quality assessment and fauna surveys such as amphibian/herpetological surveys of the potentially affected area were recommended in our previous review of the project however no such studies or assessments have been forwarded to us for review. As a result the fish, wildlife, and botanical resources that will be impacted are largely unknown and therefore whether the proposed mitigation will adequately offset the impacts to fish, wildlife and botanical resources remains also largely unknown. An Indiana Bat study may be needed to rule out the presence of this species in the area of potential impacts during the bat's reproductive season.

Impacts to non-wetland/riparian forest in the floodway/floodplain will require mitigation at the following ratios:

Impacts to non-wetland forest under 1 acre should be mitigated at a 1:1 ratio. Impacts to non-wetland forest over 1 acre should be mitigated at a minimum 2:1 ratio. This ratio may be increased if impacts to undisturbed high quality forest are likely as determined by flora and fauna surveys.

Impacts to wetlands should be mitigated at the appropriate ratio. The DNR's Floodway Habitat Mitigation guidelines (and plant lists) can be found online at: http://www.in.gov/legislative/iac/20140806-IR-312140295NRA.xml.pdf.

3) Stream Impacts

Headwater streams provide valuable aquatic and riparian habitat for small fish, wildlife such as amphibians, reptiles and invertebrates and contribute significantly to the health of downstream river segments. The Ohio EPA maintains a website containing extensive information on the characteristics of headwater streams, the issues affecting headwater streams and their ecological and economic importance. (http://www.epa.ohio.gov/dsw/wqs/headwaters/index.aspx)

Impacts to streams including intermittent and ephemeral streams should be addressed in any mitigation proposal. Stream-piping, burial or enclosure is detrimental to wildlife resources and if 150' or more is enclosed, mitigation to offset the in-stream and riparian habitat impacts should be proposed. Unavoidable stream enclosure should be done with a three-sided culvert designed with the inclusion of grates every 100ft to allow the enclosed stream area to approximate normal lighting conditions.

A single-span or multiple-span elevated road/bridge design is needed to avoid the unreasonably large impact to the stream resulting from the amount of fill needed for the road berm.

Creek crossings should be constructed using a bridge or a three-sided culvert structure instead of 4-sided (box) culverts. If box or pipe culverts are used, the bottoms should be buried a minimum of 6" (or 20% of the culvert height/pipe diameter, whichever is greater up to a maximum of 2') below the stream bed elevation. Crossings should span the entire channel width (a minimum of 1.2 times the bankfull width) and should maintain the natural stream substrate within the structure. Crossing structures should have a minimum openness ratio of 0.25. The openness ratio is defined as height x width / length. Stream depth and water velocities in the crossing structure during low-flow conditions should approximate those in the natural stream channel.

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

	The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:		
	 Revegetate all bare and disturbed areas with a mixture of native grasses, sedges, wildflowers, and native shrub and hardwood tree species as soon as possible upon completion. Do not use any varieties of Tall Fescue or other non-native plants (e.g. crown-vetch). Minimize and contain within the project limits inchannel disturbance and the clearing of trees and brush. Do not work in the waterway from April 1 through June 30 without the prior written approval of the Division of Fish and Wildlife. Do not cut any trees suitable for Indiana bat or Northern Long-eared bat roosting (greater than 3 inches dbh, living or dead, with loose hanging bark, or with cracks, crevices, or cavities) from April 1 through September 30. Use minimum average 6 inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids. Plant native hardwood trees along the top of the bank and right-of-way to replace the vegetation destroyed during construction. Post "Do Not Mow or Spray" signs along the right-of-way. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the stream or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized. Do not construct any temporary runarounds, causeways, cofferdams, pump around or stream diversion systems. Seed and protect all disturbed slopes that are 3:1 or steeper with biodegradable heavy-duty erosion control blankets (follow manufacturer's recommendations for 		
Contact Staff:	selection and installation; seed and apply mulch on all other disturbed areas. Christie L. Stanifer, Environ. Coordinator, Fish & Wildlife Our agency appreciates this opportunity to be of service. Please contact the above staff member at (317) 232-4080 if we can be of further assistance.		

Christie L. Stanifer Environ. Coordinator Division of Fish and Wildlife

David Blankenbeker, Clark County surveyor, says there are no legal drains in Clark County.

On Mon, Mar 13, 2017 at 10:39 AM, Boits, Leah <<u>lboits@structurepoint.com</u>> wrote:

Ms. Taff,

We are preparing a Waters Report for a potential road construction project in Clark County, Indiana. Please let me know if there are any legal drains within the vicinity of the proposed project. I have attached maps and aerial photography for your reference.

Thank you,

Leah

Leah Boits Environmental Specialist, Environmental Services Group



7260 Shadeland Station, Indianapolis, IN 46256

t <u>317.547.5580</u> c <u>574.850.7137</u>

e lboits@structurepoint.com w www.structurepoint.com

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IDEM (http://www.in.gov/idem/index.htm) > Proposed Roadway Letter

Indiana Department of Environmental Management We Protect Hoosiers and Our Environment.

INDOT Ron Heustis American Structurepoint Leah S. Botis

, IN Date , IN

Dear Grant Administrator or Other Finance Approval Authority:

RE: The Indiana Department of Transportation (INDOT), in partnership with the Federal Highway Administration (FHWA), the Indiana Economic Development Corporation, the Ports of Indiana, the Board of Commissioners of Clark County, the City of Jeffersonville Redevelopment Commission, and the River Ridge Development Authority (RRDA), is developing a federal-aid road project to improve connectivity for the Ports of Indiana-Jeffersonville (Port) with other regional transportation assets. The proposed project is located in Utica Township, Clark County, Indiana. The area is located on the Jeffersonville and Charlestown USGS 7.5 Minute Quadrangle Maps in Tracts 6-7, 14-17, 24-27, 38-40, and 52-53 and is within the Louisville Metropolitan Planning Area (LMPA), which consists of nine counties in Kentucky (Jefferson, Oldham, Trimble, Henry, Shelby, Spencer, Nelson, Bullit and Meade) and four Indiana counties (Washington, Harrison, Floyd and Clark). Preliminary corridor studies have identified an approximately 1.3-mile wide corridor between the Port of Indiana, Jeffersonville and State Road (SR) 265 to establish roadway alignment alternatives for the project. The alternatives are currently being developed and evaluated within the project corridor based upon environmental studies and coordination. Various maps and aerial photographs are enclosed showing the area being investigated. The project area has several major generators of traffic that consist primarily of heavy trucks or heavy haul vehicles. However, the road network in the area is primarily made of up of local facilities not designed to handle such vehicle loading. Heavy haul vehicles (often referred to as Michigan truck trains) are generally 60 feet or more in length with a gross vehicle weight of 134,000 pounds, as compared to Indiana legal load limits of 80,000 pounds gross vehicle weight. Heavy haul vehicles require the design of facilities to take into account the maximum weight of the heavy haul vehicles and the anticipated number of heavy haul vehicles utilizing the facility on a daily basis. The resulting difference between a facility designed to carry heavy haul vehicles and standard load trucks is often a significant difference in pavement thickness. Based on current and predicted rapid industrial and commercial development associated with the major traffic generators in the project area it is anticipated that truck traffic will increase by 129 percent over the next 20 years. The need for the proposed project is due to the current and predicted rapid industrial and commercial development in the area that would result in a significant increase in volume of heavy haul vehicles mixing with local traffic. This growth, combined with the lack of connectivity and suitable roadways for heavy haul vehicles in the area, indicates a need for the proposed project. The purpose of the proposed project is to provide a route built specifically for heavy haul vehicles that provides continuous connection between the RRCC and the Port via the new SR 265/Old Salem Road interchange. The proposed project corridor generally extends north from the Port to the SR 265/Old Salem Road interchange. The area is a combination of forest, open grass, industrial, and farmed areas. The forested areas are generally on steep slopes. Few existing roads are located within this area. The proposed project corridor is bounded by the SR 265 corridor at the northern project limits. Lentzier Creek and several tributaries are located within the project corridor. The proposed project consists of the construction of a 3-lane road designed to "heavy haul" specifications. The proposed road would have a design speed of 35 miles per hour with two 12-foot travel lanes and one 11- to 12-foot auxiliary lane. The road would likely be constructed on new alignment at a total length of approximately 1.75 miles. While only three lanes would be constructed, right-of-way would be wide enough to allow for future expansion to five lanes if required by traffic demand.

Appendix B Page B-44 1/19/2018 The Indiana Department of Environmental Management (IDEM) is aware that many local government or not-for-profit entities are seeking grant monies, a bond issuance, or another public funding mechanism to cover some portion of the cost of a public works, infrastructure, or community development project. IDEM also is aware that in order to be eligible for such funding assistance, applicants are required to first evaluate the potential impacts that their particular project may have on the environment. In order to assist applicants seeking such financial assistance and to ensure that such projects do not have an adverse impact on the environment, IDEM has prepared the following list of environmental issues that each applicant must consider in order to minimize environmental impacts in compliance with all relevant state laws.

IDEM recommends that each applicant consider the following issues when moving forward with their project. IDEM also requests that, in addition to submitting the information requested above, each applicant also sign the attached certification, attesting to the fact that they have read the letter in its entirety, agree to abide by the recommendations of the letter, and to apply for any permits required from IDEM for the completion of their project.

IDEM recommends that any person(s) intending to complete a public works, infrastructure, or community development project using any public funding consider each of the following applicable recommendations and requirements:

WATER AND BIOTIC QUALITY

1. Section 404 of the Clean Water Act requires that you obtain a permit from the U.S. Army Corps of Engineers (USACE) before discharging dredged or fill materials into any wetlands or other waters, such as rivers, lakes, streams, and ditches. Other activities regulated include the relocation, channelization, widening, or other such alteration of a stream, and the mechanical clearing (use of heavy construction equipment) of wetlands. Thus, as a project owner or sponsor, it is your responsibility to ensure that no wetlands are disturbed without the proper permit. Although you may initially refer to the U.S. Fish and Wildlife Service National Wetland Inventory maps as a means of identifying potential areas of concern, please be mindful that those maps do not depict jurisdictional wetlands regulated by the USACE or the Department of Environmental Management. A valid jurisdictional wetlands determination can only be made by the USACE, using the 1987 Wetland Delineation Manual.

USACE recommends that you have a consultant check to determine whether your project will abut, or lie within, a wetland area. To view a list of consultants that have requested to be included on a list posted by the USACE on their Web site, see USACE Permits and Public Notices (http://www.lrl.usace.army.mil/orf/default.asp)

(http://www.lrl.usace.army.mil/orf/default.asp

(http://www.lrl.usace.army.mil/orf/default.asp)) and then click on "Information" from the menu on the right-hand side of that page. Their "Consultant List" is the fourth entry down on the "Information" page. Please note that the USACE posts all consultants that request to appear on the list, and that inclusion of any particular consultant on the list does not represent an endorsement of that consultant by the USACE, or by IDEM.

Much of northern Indiana (Newton, Lake, Porter, LaPorte, St. Joseph, Elkhart, LaGrange, Steuben, and Dekalb counties; large portions of Jasper, Starke, Marshall, Noble, Allen, and

Adams counties; and lesser portions of Benton, White, Pulaski, Kosciusko, and Wells counties) is served by the USACE District Office in Detroit (313-226-6812). The central and southern portions of the state (large portions of Benton, White, Pulaski, Kosciosko, and Wells counties; smaller portions of Jasper, Starke, Marshall , Noble, Allen, and Adams counties; and all other Indiana counties located in north-central, central, and southern Indiana) are served by the USACE Louisville District Office (502-315-6733).

Additional information on contacting these U.S. Army Corps of Engineers (USACE) District Offices, government agencies with jurisdiction over wetlands, and other water quality issues, can be found at http://www.in.gov/idem/4396.htm (http://www.in.gov/idem/4396.htm). IDEM recommends that impacts to wetlands and other water resources be avoided to the fullest extent.

- In the event a Section 404 wetlands permit is required from the USACE, you also must obtain a Section 401 Water Quality Certification from the IDEM Office of Water Quality. To learn more about the water quality certification program, visit: http://www.in.gov/idem/4384.htm (http://www.in.gov/idem/4384.htm).
- 3. If the USACE determines that a wetland or other body of water is isolated and not subject to Clean Water Act regulation, it is still regulated by the state of Indiana . A state isolated wetland permit from IDEM's Office of Water Quality is required for any activity that results in the discharge of dredged or fill materials into isolated wetlands. To learn more about isolated wetlands, contact the Office of Water Quality at 317-233-8488.
- 4. If your project will impact more than 0.5 acres of wetland, stream relocation, or other largescale alterations to bodies of water such as the creation of a dam or a water diversion, you should seek additional input from the Office of Water Quality, Wetlands staff at 317-233-8488.
- 5. Work within the one-hundred year floodway of a given body of water is regulated by the Department of Natural Resources, Division of Water. Contact this agency at 317-232-4160 for further information.
- 6. The physical disturbance of the stream and riparian vegetation, especially large trees overhanging any affected water bodies should be limited to only that which is absolutely necessary to complete the project. The shade provided by the large overhanging trees helps maintain proper stream temperatures and dissolved oxygen for aquatic life.
- For projects involving construction activity (which includes clearing, grading, excavation and other land disturbing activities) that result in the disturbance of one (1), or more, acres of total land area, contact the Office of Water Quality – Watershed Planning Branch (317/233-1864) regarding the need for of a Rule 5 Storm Water Runoff Permit. Visit the following Web page
 - http://www.in.gov/idem/4902.htm (http://www.in.gov/idem/4902.htm)

To obtain, and operate under, a Rule 5 permit you will first need to develop a Construction Plan (http://www.in.gov/idem/4917.htm#constreq

(http://www.in.gov/idem/4917.htm#constreq)), and as described in 327 IAC 15-5-6.5 (http://www.in.gov/legislative/iac/T03270/A00150 [PDF] (http://www.in.gov/legislative/iac/T03270/A00150.PDF), pages 16 through 19). Before you may apply for a Rule 5 Permit, or begin construction, you must submit your Construction Plan to your county Soil and Water Conservation District (SWCD) (http://www.in.gov/isda/soil/contacts/map.html (http://www.in.gov/isda/soil/contacts/map.html)).

Upon receipt of the construction plan, personnel of the SWCD or the Indiana Department of Environmental Management will review the plan to determine if it meets the requirements of 327 IAC 15-5. Plans that are deemed deficient will require re-submittal. If the plan is sufficient you will be notified and instructed to submit the verification to IDEM as part of the Rule 5 Notice of Intent (NOI) submittal. Once construction begins, staff of the SWCD or Indiana Department of Environmental Management will perform inspections of activities at the site for compliance with the regulation.

Please be mindful that approximately 149 Municipal Separate Storm Sewer System (MS4) areas are now being established by various local governmental entities throughout the state as part of the implementation of Phase II federal storm water requirements. All of these MS4 areas will eventually take responsibility for Construction Plan review, inspection, and enforcement. As these MS4 areas obtain program approval from IDEM, they will be added to a list of MS4 areas posted on the IDEM Website at: http://www.in.gov/idem/4900.htm (http://www.in.gov/idem/4900.htm).

If your project is located in an IDEM-approved MS4 area, please contact the local MS4 program about meeting their storm water requirements. Once the MS4 approves the plan, the NOI can be submitted to IDEM.

Regardless of the size of your project, or which agency you work with to meet storm water requirements, IDEM recommends that appropriate structures and techniques be utilized both during the construction phase, and after completion of the project, to minimize the impacts associated with storm water runoff. The use of appropriate planning and site development and appropriate storm water quality measures are recommended to prevent soil from leaving the construction site during active land disturbance and for post construction water quality concerns. Information and assistance regarding storm water related to construction activities are available from the Soil and Water Conservation District (SWCD) offices in each county or from IDEM.

- 8. For projects involving impacts to fish and botanical resources, contact the Department of Natural Resources Division of Fish and Wildlife (317-232-4080) for additional project input.
- 9. For projects involving water main construction, water main extensions, and new public water supplies, contact the Office of Water Quality Drinking Water Branch (317-308-3299) regarding the need for permits.

- For projects involving effluent discharges to waters of the State of Indiana , contact the Office of Water Quality - Permits Branch (317-233-0468) regarding the need for a National Pollutant Discharge Elimination System (NPDES) permit.
- 11. For projects involving the construction of wastewater facilities and sewer lines, contact the Office of Water Quality Permits Branch (317-232-8675) regarding the need for permits.

AIR QUALITY

The above-noted project (see page 1) should be designed to minimize any impact on ambient air quality in, or near, the project area. The project must comply with all federal and state air pollution regulations. Consideration should be given to the following:

 Regarding open burning, and disposing of organic debris generated by land clearing activities; some types of open burning are allowed under specific conditions (http://www.in.gov/idem/4148.htm (http://www.in.gov/idem/4148.htm)). You also can seek an open burning variance from IDEM.

IDEM generally recommends that you take vegetative wastes to a registered yard waste composting facility or that the waste be chipped or shredded with composting on-site. You must register with IDEM if more than 2,000 pounds is to be composted; contact 317-232-0066). The finished compost can then be used as a mulch or soil amendment. You also may bury any vegetative wastes (such as leaves, twigs, branches, limbs, tree trunks and stumps) on-site, although burying large quantities of such material can lead to subsidence problems.

 Reasonable precautions must be taken to minimize fugitive dust emissions from construction and demolition activities. For example, wetting the area with water, constructing wind barriers, or treating dusty areas with chemical stabilizers (such as calcium chloride or several other commercial products). Dirt tracked onto paved roads from unpaved areas should be minimized.

If construction or demolition is conducted in a wooded area where blackbirds have roosted or abandoned buildings or building sections in which pigeons or bats have roosted for three to five years, precautionary measures should be taken to avoid an outbreak of histoplasmosis. This disease is caused by the fungus Histoplasma capsulatum, which stems from bird or bat droppings that have accumulated in one area for three to five years. The spores from this fungus become airborne when the area is disturbed and can cause infections over an entire community downwind of the site. The area should be wetted down prior to cleanup or demolition of the project site. For more detailed information on histoplasmosis prevention and control, please contact the Acute Disease Control Division of the Indiana State Department of Health at 317-233-7272.

3. The U.S. EPA and the U.S. Surgeon General recommend that people not have long-term exposure to radon at levels above 4 pCi/L. For a county-by-county map of predicted radon levels in Indiana , visit http://www.in.gov/idem/4267.htm (http://www.in.gov/idem/4267.htm).

The U.S. EPA further recommends that all homes and apartments (within three stories of ground level) be tested for radon. If in-home radon levels are determined to be 4 pCi/L or higher, then U.S. EPA recommends a follow-up test. If the second test confirms that radon levels are 4 pCi/L or higher, then U.S. EPA recommends the installation of radon-reduction measures. For a list of qualified radon testers and radon mitigation (or reduction) specialists, visit http://www.

in.gov/isdh/regsvcs/radhealth/pdfs/radon_testers_mitigators_list.pdf (http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon_testers_mitigators_list.pdf). Also, is recommended that radon reduction measures be built into all new homes, particularly in areas like Indiana that have moderate to high predicted radon levels.

To learn more about radon, radon risks, and ways to reduce exposure, visit http://www.in.gov/isdh/regsvcs/radhealth/radon.htm (http://www.in.gov/isdh/regsvcs/radhealth/radon.htm), http://www.in.gov/idem/4145.htm (http://www.in.gov/idem/4145.htm), or http://www.epa.gov/radon/index.html (http://www.epa.gov/radon/index.html).

4. With respect to asbestos removal, all facilities slated for renovation or demolition (except residential buildings that have four (4) or fewer dwelling units and which will not be used for commercial purposes) must be inspected by an Indiana-licensed asbestos inspector prior to the commencement of any renovation or demolition activities. If regulated asbestos-containing material (RACM) that may become airborne is found, any subsequent demolition, renovation, or asbestos removal activities must be performed in accordance with the proper notification and emission control requirements.

If no asbestos is found where a renovation activity will occur, or if the renovation involves removal of less than 260 linear feet of RACM off of pipes, less than 160 square feet of RACM off of other facility components, or less than 35 cubic feet of RACM off of all facility components, the owner or operator of the project does not need to notify IDEM before beginning the renovation activity.

For questions on asbestos demolition and renovation activities, you can also call IDEM's Lead/Asbestos section at 1-888-574-8150.

In all cases where a demolition activity will occur (even if no asbestos is found), the owner or operator must still notify IDEM 10 working days prior to the demolition, using the form found at www.in.gov/icpr/webfile/formsdiv/44593.pdf.

Anyone submitting a renovation/demolition notification form will be billed a notification fee based upon the amount of friable asbestos containing material to be removed or demolished. Projects that involve the removal of more than 2,600 linear feet of friable asbestos containing materials on pipes, or 1,600 square feet or 400 cubic feet of friable asbestos containing material on other facility components, will be billed a fee of \$150 per project; projects below these amounts will be billed a fee of \$50 per project. Billings will occur on a quarterly basis. For more information about IDEM policy regarding asbestos removal and disposal, visit: http://www.in.gov/idem/4983.htm (http://www.in.gov/idem/4983.htm).

- 5. With respect to lead-based paint removal, IDEM encourages all efforts to minimize human exposure to lead-based paint chips and dust. IDEM is particularly concerned that young children exposed to lead can suffer from learning disabilities. Although lead-based paint abatement efforts are not mandatory, any abatement that is conducted within housing built before January 1, 1978, or a child-occupied facility is required to comply with all lead-based paint work practice standards, licensing and notification requirements. For more information about lead-based paint removal, visit http://www.in.gov/idem/permits/guide/waste/leadabatement.html (http://www.in.gov/idem/permits/guide/waste/leadabatement.html).
- 6. Ensure that asphalt paving plants are permitted and operate properly. The use of cutback asphalt, or asphalt emulsion containing more than seven percent (7%) oil distillate, is prohibited during the months of April through October. See 326 IAC 8-5-2, Asphalt Paving Rule (http://www.ai.org/legislative/iac/T03260/A00080.PDF (http://www.ai.org/legislative/iac/T03260/A00080.PDF)).
- 7. If your project involves the construction of a new source of air emissions or the modification of an existing source of air emissions or air pollution control equipment, it will need to be reviewed by the IDEM Office of Air Quality (OAQ). A registration or permit may be required under 326 IAC 2 (www.ai.org/legislative/iac/t03260/a00020.pdf (http://www.ai.org/legislative/iac/t03260/a00020.pdf).). New sources that use or emit hazardous air pollutants may be subject to Section 112 of the Clean Air Act and corresponding state air regulations governing hazardous air pollutants.
- 8. For more information on air permits, visit http://www.in.gov/idem/4223.htm (http://www.in.gov/idem/4223.htm), or to initiate the IDEM air permitting process, please contact the Office of Air Quality Permit Reviewer of the Day at (317) 233-0178 or oamprod at idem.in.gov.

LAND QUALITY

In order to maintain compliance with all applicable laws regarding contamination and/or proper waste disposal, IDEM recommends that:

- 1. If the site is found to contain any areas used to dispose of solid or hazardous waste, you need to contact the Office of Land Quality (OLQ) at 317-308-3103.
- 2. All solid wastes generated by the project, or removed from the project site, need to be taken to a properly permitted solid waste processing or disposal facility. For more information, visit http://www.in.gov/idem/4998.htm (http://www.in.gov/idem/4998.htm).
- 3. If any contaminated soils are discovered during this project, they may be subject to disposal as hazardous waste. Please contact the OLQ at 317-308-3103 to obtain information on proper disposal procedures.

- 4. If Polychlorinated Biphenyls (PCBs) are found at this site, please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding management of any PCB wastes from this site.
- 5. If there are any asbestos disposal issues related to this site, please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding the management of asbestos wastes. (Asbestos removal is addressed above, under Air Quality.)
- If the project involves the installation or removal of an underground storage tank, or involves contamination from an underground storage tank, you must contact the IDEM Underground Storage Tank program at 317-308-3039(http://www.in.gov/idem/4999.htm (http://www.in.gov/idem/4999.htm)).

FINAL REMARKS

Should the applicant need to obtain any environmental permits in association with this proposed project, please be mindful that IC 13-15-8 requires that they notify all adjoining property owners and/or occupants within ten days of your submittal of each permit application. Applicants seeking multiple permits, may still meet the notification requirement with a single notice if all required permit applications are submitted with the same ten day period.

Please note that this letter does not constitutes a permit, license, endorsement, or any other form of approval on the part of either the Indiana Department of Environmental Management or any other Indiana state agency.

Should you have any questions relating to the content or recommendations of this letter, or if you have additional questions about whether a more complete environmental review of your project should be conducted, please feel free to contact Steve Howell at (317) 232-8587, snhowell@idem.in.gov.

Signature(s) of the Applicant

I acknowledge that I am seeking grant monies, a bond issuance, or other public funding mechanism to cover some portion of the cost of the public works, infrastructure, or community development project as described herein, which I am working (possibly with others) to complete.

Project Description

The Indiana Department of Transportation (INDOT), in partnership with the Federal Highway Administration (FHWA), the Indiana Economic Development Corporation, the Ports of Indiana, the Board of Commissioners of Clark County, the City of Jeffersonville Redevelopment Commission, and the River Ridge Development Authority (RRDA), is developing a federal-aid road project to improve connectivity for the Ports of Indiana-Jeffersonville (Port) with other regional transportation assets. The proposed project is located in Utica Township, Clark County, Indiana. The area is located on the Jeffersonville and Charlestown USGS 7.5 Minute Quadrangle Maps in Tracts 6-7, 14-17, 24-27, 38-40, and 52-53 and is within the Louisville Metropolitan Planning Area (LMPA), which consists of nine counties in Kentucky (Jefferson, Oldham, Trimble, Henry, Shelby, Spencer, Nelson, Bullit and Meade) and four Indiana counties (Washington, Harrison, Floyd and Clark). Preliminary corridor studies have identified an approximately 1.3-mile wide corridor between the Port of Indiana, Jeffersonville and State Road (SR) 265 to establish roadway alignment alternatives for the project. The alternatives are currently being developed and evaluated within the project corridor based upon environmental studies and coordination. Various maps and aerial photographs are enclosed showing the area being investigated. The project area has several major generators of traffic that consist primarily of heavy trucks or heavy haul vehicles. However, the road network in the area is primarily made of up of local facilities not designed to handle such vehicle loading. Heavy haul vehicles (often referred to as Michigan truck trains) are generally 60 feet or more in length with a gross vehicle weight of 134,000 pounds, as compared to Indiana legal load limits of 80,000 pounds gross vehicle weight. Heavy haul vehicles require the design of facilities to take into account the maximum weight of the heavy haul vehicles and the anticipated number of heavy haul vehicles utilizing the facility on a daily basis. The resulting difference between a facility designed to carry heavy haul vehicles and standard load trucks is often a significant difference in pavement thickness. Based on current and predicted rapid industrial and commercial development associated with the major traffic generators in the project area it is anticipated that truck traffic will increase by 129 percent over the next 20 years. The need for the proposed project is due to the current and predicted rapid industrial and commercial development in the area that would result in a significant increase in volume of heavy haul vehicles mixing with local traffic. This growth, combined with the lack of connectivity and suitable roadways for heavy haul vehicles in the area, indicates a need for the proposed project. The purpose of the proposed project is to provide a route built specifically for heavy haul vehicles that provides continuous connection between the RRCC and the Port via the new SR 265/Old Salem Road interchange. The proposed project corridor generally extends north from the Port to the SR 265/Old Salem Road interchange. The area is a combination of forest, open grass, industrial, and farmed areas. The forested areas are generally on steep slopes. Few existing roads are located within this area. The proposed project corridor is bounded by the SR 265 corridor at the northern project limits. Lentzier Creek and several tributaries are located within the project corridor. The proposed project consists of the construction of a 3-lane road designed to "heavy haul" specifications. The proposed road would have a design speed of 35 miles per hour with two 12foot travel lanes and one 11- to 12-foot auxiliary lane. The road would likely be constructed on new alignment at a total length of approximately 1.75 miles. While only three lanes would be constructed, right-of-way would be wide enough to allow for future expansion to five lanes if required by traffic demand.

With my signature, I do hereby affirm that I have read the letter from the Indiana Department of Environmental Management that appears directly above. In addition, I understand that in order to complete the project in which I am interested, with a minimum impact to the environment, I must consider all the issues addressed in the aforementioned letter, and further, that I must obtain any required permits.

https://portal.idem.in.gov/IDEMWebForms/enviroletter.aspx

Dated Signature of the Public Owner Contact/Responsible Elected Official	Ronald Heustis, P.E.	Digitally signed by Ronald Heustis, P.E. DN: cn=Ronald Heustis, P.E., o=INDOT, ou, email=rheustis@indot.in.gov, c=US Date: 2018.01.19 17:24:54 -05'00'
Dated Signature of the Project Planner/Consultant Contact Person	Ron Heustis Leah S. Botis	2018-01-19

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INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue Room N642 Indianapolis, Indiana 46204 PHONE: (317) 233-6795 FAX: (317) 233-4929 Eric Holcomb, Governor Joe McGuinness, Commissioner

October 16, 2017

Re: Alternatives Analysis Des. No. 1382612 Heavy Haul Transportation Corridor Utica Township, Clark County, Indiana

Dear Regulatory Agency Members,

On April 29, 2016 early coordination letters were mailed out providing details for a federally funded road project proposed by the Indiana Department of Transportation (INDOT), in partnership with the Federal Highway Administration (FHWA), the Indiana Economic Development Corporation, the Ports of Indiana, the Board of Commissioners of Clark County, the City of Jeffersonville Redevelopment Commission, and the River Ridge Development Authority (RRDA). A copy of the early coordination is attached for your reference. This letter is written as a touchpoint to describe the development of the project since the initial early coordination was initiated and to seek your comments regarding those resources under your jurisdiction. Your cooperation in this endeavor is appreciated.

On May 26, 2016 representatives from American Structurepoint, United Consulting, INDOT, and FHWA, met with resource agencies at the American Structurepoint office to discuss the purpose and need of the project as well as several preliminary alternatives currently being assessed. Agencies brought up concerns with alternatives A1, A2, and alternative G; these alternatives appeared to have the greatest amount of stream and wetland impacts, as well as the largest construction limitations due to elevation change. In an effort to reduce potential impacts, it was suggested that Alternatives D and E be combined and evaluated as an additional alternative. Because of the potential magnitude of stream, forest, and endangered species impacts, touch base meetings and ongoing coordination with INDOT, FHWA, USFWS, USACE, and IDEM has continued since the resource agency meeting.

Since the May 26, 2016 agency meeting, an alternatives matrix was developed and refined. This matrix originally compared the impacts of nine alternatives (No-Build, A1, A2, and B-G). As coordination continued, Alternatives DE and HH were added. Through the continued coordination with USFWS, USACE, IDEM, INDOT, and FHWA, Alternatives DE, F, and HH were determined to meet the purpose and need and minimize the amount of overall impacts to resources. Because forest, stream, and wetland impacts are estimated to be similar between the three alternatives, IDEM, USACE, and USFWS agreed that any of the three alternatives would likely be acceptable. Since Alternative DE is known to likely avoid impacts to archaeological resources and the overall project corridor is known to be rich with significant archaeological resources, the USACE, IDEM, USFWS, and FHWA agreed that it would be acceptable if Alternative DE was moved forward through the environmental review process. For reference, see the enclosed original and revised alternatives matrix screenings and mapping.

You are asked to review this information and provide any comments you may have relative to anticipated impacts of the project on areas in which you have jurisdiction or special expertise. We will incorporate your comments into the selection and final design of a preferred alternative. To facilitate the development of this

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INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue Room N642 Indianapolis, Indiana 46204 PHONE: (317) 233-6795 FAX: (317) 233-4929 Eric Holcomb, Governor Joe McGuinness, Commissioner

project, you are asked to reply within 30 days of receipt of this letter. If no response is received by that date, it will be assumed you have no comments at the present time.

Your timely cooperation in the development of this project is appreciated. For general inquiries please contact myself at (317) 234-4916 or by e-mail at <u>rbales@indot.in.gov</u>. However, please contact our consultant, Leah Boits of American Structurepoint at (317) 547-5580 or by e-mail at <u>lboits@structurepoint.com</u> for coordination purposes, questions, or if additional information is needed.

Respectfully,

Ron Bales Environmental Policy Manager Indiana Department of Transportation

Enclosures

Sample Early Coordination Letter Original Alternatives Matrix Original Alternatives Map Revised Viable Alternatives Matrix Revised Viable Alternatives Map

Sample Early Coordination Letter on page B-1; enclosures found in Appendix A

