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Using USFWS's IPaC System for Listed Bat Consultation for INDOT Projects

As of October 30, 2017, all environmental document preparers coordinate through the USFWS's online Information for Planning and Consultation (IPaC) system. IPaC is a guided analysis of project impacts and streamlines coordination with USFWS under the Rangewide Programmatic Agreement for the Indiana bat and northern long-eared bat. The Rangewide Programmatic Agreement is based on a biological opinion which can be found on the USFWS Section 7 website:

<https://www.fws.gov/MIDWEST/Endangered/section7/fhwa/index.html>.

For information on INDOT's implementation of the Rangewide Programmatic Agreement, see materials on the INDOT Environmental Services Policy website <https://www.in.gov/indot/2523.htm>. This programmatic consultation process applies to all projects that receive FHWA, FRA, or FTA funds, and must be completed separately from other Section 7 USFWS coordination. The programmatic consultation only covers the Indiana bat and the northern long-eared bat, so preparers must coordinate on other listed species through INDOT's other species procedures or apply the USFWS Interim Policy, if applicable. Please note, all bat coordination and questions start with the appropriate INDOT District Environmental. USFWS should not be coordinated with prior to INDOT.

The web site, <https://ecos.fws.gov/ipac/>, is fairly self-explanatory. It also contains a useful FAQ and a tutorial. Please note, IPaC is undergoing many ongoing updates. If there are questions about completing IPaC, or if new or out of the ordinary information is requested, please coordinate with the appropriate INDOT District Environmental prior to completing the IPaC information.

Another helpful resource when completing IPaC is INDOT's Protected Species guidance located on the INDOT Environmental Policy website. Additional information regarding bridge/structure inspections, common USFWS definitions, interpreting IPaC determination key questions, etc. can be found in the document.

USFWS uses the data in IPaC to track project documentation and report on various aspects of the Rangewide Programmatic Agreement. Projects can be entered in IPaC by consultant preparers but must be verified for completeness and correctness by an environmental employee of a signatory transportation agency. In this case, the verifier is INDOT.

The following information should be available when you start: USFWS database check results (0.5 mile checks), RFI ecological information recommendations, the USFWS species list for the project area, bridge/structure inspection(s), site visit observations, suitable summer habitat assessment results (if applicable), and specific project details such as: scope of work, the project limits, timing of proposed work, vegetation removal, additional lighting, etc.

Instructions for Document Preparers:

1. Locating your project: upload the correct shapefile for the footprint of your project if available.

2. Naming your project: Name your project so it can be found again. At minimum, use the DES, primary road name/number, and short project description in the title (i.e. Bridge Project, Small Structure Project, Roadway Project). If uncertain what to use as a name, work out a descriptive name with the appropriate INDOT District Environmental.

3. Project Description: This should describe the project according to what is of interest to USFWS, not the full project description that will be included in the environmental document. Please note, the project description box in IPaC has a character limit, so only information that is of interest to USFWS should be included. Information needed for USFWS is:
 - Scope of work, the project limits, and bridge/structure(s) involved.
 - Suitable summer habitat located within or adjacent to the project, how much of it will be trimmed and/or removed in acres or number of trees, species of dominant trees to be removed, and when it will be removed (i.e. inactive bat season, season and year).
 - Include the amount of tree trimming and/or clearing needed for the project. If the project needs to clear trees beyond 100ft from the existing roadway, break out tree clearing in the project description to include distance where clearing will occur. For example, a total of 10 acres of trees will be removed for the project. 4 acres will be removed within 100ft of the roadway and 6 acres will be removed 100-300ft from the roadway.
 - It is important to be accurate with the amount of tree trimming and/or clearing needed for the project. If tree trimming and/or clearing amounts change after the environmental document is approved, re-coordination with INDOT and USFWS must occur. This might cause additional project costs and timing delays to the project.
 - The results of the USFWS database check (0.5-mile check with the appropriate INDOT District Environmental) for captures, roosts, maternity colonies, and hibernacula. Include the date of the check.
 - The results of the 0.5-mile check and/or additional coordination with USFWS will need to be included in the project description (see further discussion below in this document).
 - Make sure to describe any captures, roosts, maternity colonies, and/or hibernacula close to the project area in general terms. Do not include exact locations. For example, 2 Indiana bat captures were found close to the project area. Additional coordination occurred with USFWS on (date). Through the additional coordination with the USFWS it was concluded that this project is not located in documented Indiana bat habitat.
 - There is not currently an expiration date on 0.5-mile bat checks, however, the GIS layer data gets updated periodically from USFWS field information. In the future there might be an expiration on the 0.5-mile bat checks. If your project is older or has taken several years to get to letting, it is highly recommended the 0.5-mile check be completed again to ensure there is no new bat habitat near the project area.
 - If a project is located within a 10-mile buffer of a hibernacula, the time of year tree clearing restrictions will be reduced. This is to allow for fall bat swarming season to be concluded prior to tree removal.
 - Results of the bat inspection of the bridge/structure(s). This will come from BIAS and/or environmental inspection(s). This also includes any structure or building that will be removed due to the project. Please note, if bats or signs of bats are found during the inspection, coordination will need to occur with the appropriate INDOT District Environmental as soon as

- possible. Likely, the next step would be to collect guano for analysis which may be time sensitive.
- Describe the estimated timing of work.
 - Discuss temporary or permanent lighting needs.
 - If the project will require mitigation, under the In-Lieu Fee Program, include the In-lieu fee calculation (amount in acres x ratio x (current amount for IN) = dollars for mitigation) in the project description.
 - There may be more than one type of project that requires mitigation. The most common examples include, clearing trees 100-300ft from an existing roadway, clearing any trees in a documented Indiana bat habitat (confirmed by USFWS coordination), etc.
4. Completing the Determination Key: Read each question carefully and answer based on the scope and likely effects of the project.
- a. Do not guess—discuss with the project manager or designer if you need to determine any facts about the project. Discuss with the appropriate INDOT District Environmental if you are uncertain how to interpret a question in the key.
 - b. **USFWS database check:** 0.5 mile bat checks with the appropriate INDOT District Environmental must be completed prior to completing IPaC. This ensures accurate information is incorporated in IPaC.
 - c. **Documented Indiana bat or northern long-eared bat habitat:** If any captures or roosts are found in the 0.5 mile check, IPaC cannot be completed until it is determined if the project is located within Indiana bat and/or northern long-eared bat habitat. Coordinate with the appropriate INDOT District Environmental to determine if additional coordination is needed with USFWS before completing IPaC.
 - d. **Temporary lighting:** Respond accordingly based on the project. Please contact the appropriate INDOT District Environmental to determine district policies regarding night work. Some districts may require this to be yes based on construction schedules. If there is any possibility for night work to be performed the answer should be 'yes'. A 'no' may require a firm commitment and USP prohibiting night work and if the MOT changes to include night work later in the project the IPaC questionnaire would need to be updated.
 - e. **Permanent Lighting:** If a project involves replacing or adding traffic signals or railroad signals, yes should be answered for the question: "Will the project install new or replace existing permanent lighting?" Per the USFWS Biological Opinion, traffic signals and railroad signals are considered permanent lighting. Once yes is answered for that question, there will be two additional questions: "Does the lead agency use the BUG (Backlight, Uplight, and Glare) system developed by the Illuminating Engineering Society^{[1][2]} to rate the amount of light emitted in unwanted directions?" and "Will the permanent lighting be designed to be as close to 0 for all three BUG ratings as possible, with a priority of "uplight" of 0 and "backlight" as low as practicable?" Yes can be answered for those questions due to the replacement permanent lighting will not be substantially different than the baseline light conditions.
 - f. **Mitigation (if applicable):** Indicate the "Rangewide In-Lieu Fee Program, The Conservation Fund" will be the type of mitigation used.
 - g. **Additional Species:** If the IPaC species list does not generate any additional species (other than the Indiana bat and northern long-eared bat), N/A should be answered for the other species determination questions in IPaC.

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5. Upload any documents (i.e. environmental inspections, BIAS inspections, or aerials) needed to support the assertions made in the determination key.
 - a. If no site visit or field work will be required for the project (PCEs), likely BIAS inspections can be the only inspection uploaded into IPaC. However, if the BIAS inspection is close to 2 years old, an additional inspection might be needed. Please note, this is up to the appropriate INDOT District Environmental discretion, so prior to IPaC submittal, coordination will need to occur with the appropriate INDOT District Environmental to ensure the appropriate inspections are being included in the IPaC determination key. If there are questions about the BIAS inspection, coordinate with the appropriate INDOT District Environmental.
 - b. If site visit and/or field work is required for the project, an environmental inspection (using the USFWS or INDOT form) must occur on bridges/structures. Both the BIAS and environmental inspection forms will be uploaded into IPaC for review. If discrepancies between the inspections are found, research and/or additional inspections will need to occur to verify what is present at the bridge/structure before the IPaC determination key can be completed.
 - c. When uploading BIAS inspections into IPaC only include the title page and bat results page of the inspection. Do not include the entire BIAS inspection.
 - d. All structures/buildings that will be removed for a project require an inspection prior to completing IPaC. If the structures/buildings are still occupied, an external inspection of the structure will need to occur. Use the USFWS or INDOT form when completing the inspection. Also, a firm commitment will be added into the environmental document for an additional inspection to occur prior to demolition. The language for the firm commitment can be found in the Protected Species guidance document located on the INDOT Environmental Policy website.
 - e. Coordinate with the appropriate INDOT District Environmental for questions about inspections.
 - f. Either of the following forms can be used for environmental inspections.

USFWS Inspection Form:

<https://www.fws.gov/midwest/endangered/section7/fhwa/pdf/Bridge%20Culvert%20Bat%20Assessment%20Form%20April%202020%20-%20fillable.pdf>

INDOT Inspection Form is attached at the end of this document.

6. Adding the appropriate INDOT District Environmental: Project members can see the information that you have prepared for a project. You may add as many members as necessary to keep your project team informed. For INDOT, being added as a member allows us to verify the project so it can be processed by USFWS. To determine the appropriate INDOT District Environmental, the county where the project will be occurring should be used. For example, if the project will be occurring in Clay County, Crawfordsville district would be the appropriate INDOT District Environmental. If the project is located in multiple counties and districts, coordinate with the INDOT project manager to determine what the lead district for the project will be. All bat coordination and questions start with the appropriate INDOT District Environmental. USFWS should not be coordinated with prior to INDOT. If additional questions or coordination is needed for a project, INDOT will coordinate with USFWS. The only exception is if an early coordination

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letter is required to be sent to USFWS for the project. Early coordination letters should not automatically be sent to USFWS for every project. Refer to the INDOT early coordination guidance <https://www.in.gov/indot/files/ECL%20Recipient%20List.pdf> and the USFWS Interim Policy https://www.in.gov/indot/files/USFWS%20Interim%20Policy_2013.pdf to determine if an early coordination letter should be sent to USFWS for your project.

Click on the Member button to add the appropriate INDOT District Environmental to the project.

- a. Crawfordsville: Zane Kurtz, RKurtz@indot.IN.gov AND Makinna Laymon, MLaymon2@indot.IN.gov
- b. Fort Wayne: Karen Novak, KNovak@indot.in.gov AND Madeline Mettler, MMettler1@indot.in.gov
- c. Greenfield: Taylor Darrah, TDarrah@indot.in.gov
- d. LaPorte: Stewart Michels, Smichels@indot.IN.gov, Cassie Wahl, CWahl@indot.IN.gov, AND Bridgette Murray, BMurray@indot.IN.gov
- e. Seymour: David Dye, DDye@indot.IN.gov
- f. Vincennes: Ryan Falls, rfalls@indot.in.gov AND Kristy Wright, KWright@indot.IN.gov
- g. Central Office: Laura Hilden, lhilden@indot.in.gov AND Meghan Hinkle, MHinkle@indot.IN.gov

7. Avoidance and Minimization Measures (AMM): All AMMs become firm commitments on the project. Discuss these AMMs with the designer and with the INDOT or LPA project manager before completing the key to be sure that they can be accommodated in the project work or schedule. In some cases, altering the project schedule or scope can reduce the onerousness of the AMMs and resulting commitments.
8. Consistency Letter: The outcomes of the determination key are recorded in the consistency letter as No Effect (NE), May Affect - Not Likely to Adversely Affect (MA-NLAA) and May Affect - Likely to Adversely Affect (MA-LAA).
9. Submission to USFWS via INDOT: Once the determination key is complete, the project is ready for INDOT District Environmental to review. Once INDOT District Environmental determines the information is complete and correct, INDOT District Environmental will verify the project, which starts USFWS's comment opportunity. USFWS and the project members receive automatic notifications from IPaC that the project has been verified. For MA-NLAA determinations USFWS receives a 14-day review period. For MA-LAA determinations USFWS receives a 30-day review period and the project will receive a concurrence letter.
 - a. For NE, INDOT District Environmental will review for completeness and correctness. Send an email to the appropriate INDOT District Environmental with the DES number and a request for review in IPaC.
 - b. For MA-NLAA, send an email to the appropriate INDOT District Environmental with the DES number, the USFWS record locator number (from the consistency letter), and a request to verify the project.
 - c. MA-LAA projects receive limited formal rangewide programmatic consultation. Currently, IPaC does not have an automated verification process for LAA projects. For LAA projects, add the appropriate INDOT District Environmental as an IPaC project member and email the

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consistency letter to the appropriate INDOT District Environmental with a request to continue the IPaC review and coordination with USFWS.

10. Environmental Document: Include the appropriate species list, IPaC letter, and inspection form(s) in the environmental document appendix. Please note, BIAS inspections should only include the title page and bat results page of the inspection. Do not include the entire BIAS inspection.
 - a. For NE, include the official species list, consistency letter, BIAS inspection and/or environmental inspection.
 - b. For MA-NLAA, include the official species list, the full concurrence letter, BIAS inspection and environmental inspection. (If the project completes standard informal coordination there may be different attachments to the CE document)
 - c. For MA-LAA, include the official species list, full consistency letter, the USFWS concurrence letter, BIAS inspection and environmental inspection.

11. Commitments: Record all AMMs as firm commitments in the commitments database. If a USFWS concurrence letter is received there may be additional firm commitments from the letter that will need included. Firm commitments must be resolved with USPs to the contract.
 - a. Additional commitments may be added at the discretion of INDOT. For example, a bridge inspection firm commitment may be added (USFWS bridge and structure inspections are only valid for two years) if there is a gap in time from the submitted inspection into IPaC and the construction date.

INDOT Bridge/Small Structure Bat Inspection Data Sheet (Rev 4/29/2016)

General Information		
Date of Inspection:	Initial Inspection <input type="checkbox"/>	Temp:
Time of Inspection:	Follow-up Inspection <input type="checkbox"/>	Wind:
County:	Construction <input type="checkbox"/>	Precip:
Inspected by:		Sunrise: Sunset:
GPS Northing:	Contract Number:	Anticipated Start Date for Construction:
Easting:		
UTM Zone: 16		

Bridge or Culvert	Bridge or Culvert
Stream or Road Crossed:	Station:
Bridge/Culvert number:	Number of Spans:
Type of Structure: <input type="checkbox"/> Concrete box beam <input type="checkbox"/> Steel beam <input type="checkbox"/> Concrete I-beam <input type="checkbox"/> Steel girder <input type="checkbox"/> Concrete bulb tee beam <input type="checkbox"/> Steel pony truss <input type="checkbox"/> Concrete arch <input type="checkbox"/> Welded steel thru girder <input type="checkbox"/> Concrete girder <input type="checkbox"/> Concrete box culvert <input type="checkbox"/> Concrete slab <input type="checkbox"/> Concrete pipe <input type="checkbox"/> Multi-plate arch <input type="checkbox"/> Corrugated steel pipe <input type="checkbox"/> Other (list):	Material: <input type="checkbox"/> Concrete <input type="checkbox"/> Steel <input type="checkbox"/> Other (describe): Shape: <input type="checkbox"/> Box Culvert <input type="checkbox"/> Pipe <input type="checkbox"/> Arch <input type="checkbox"/> Slab <input type="checkbox"/> Other (describe)
Searched entire structure? If not, why not?	Location of bats or signs of use (w/drawing and photos):
Bats Present? <input type="checkbox"/> Seen? <input type="checkbox"/> Heard?	
In Clusters? Number of clusters:	
Number of bats in largest cluster:	
Approximate total number of bats found:	
Signs of previous bat use? <input type="checkbox"/> Guano <input type="checkbox"/> Staining	

If Bats Present
Date and Time Project Supervisor was notified:
Name of Project Supervisor notified:

For bridges and culverts, provide plan, longitudinal and cross section views as appropriate.

