Appendix C

Early Coordination

PARSONS

101 West Ohio Street, Suite 2121 | Indianapolis, IN 46204
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October 11, 2019

Example Early Coordination letter.

«First_Name» «Last_Name»
«Organization»
«Department»
«Street_Address»
«City_State_Zip»

Re: Des. No.: 1382874
Description: Salt Creek Trail Project Phase 3
0.53 mile Southeast of the SR 46/SR 135 Intersection
Nashville, Brown County, Indiana

Dear «Salutation» «Last_Name»,

Brown County, Indiana is planning a shared-use path southeast of Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail, approximately 0.53 mile southeast of the SR 46/SR 135 intersection. Specifically, this project is located in the Nashville Quadrangle, in Sections 19, 20, and 30 of Township 9 North, Range 3 East (39.197622°, - 86.231004°). A portion of this path is within the incorporated limits of Nashville, Indiana. Environmental analysis is being conducted for this project. This letter is part of the early coordination phase of the environmental review process. We are requesting comments from your area of expertise regarding any possible environmental effects associated with this project. Please use the above designation number and description in your reply. We will incorporate your comments into a study of the project's environmental impacts.

Purpose and Need: This project is Phase 3 of the Salt Creek Trail. This segment of the trail would connect Phase 2 of the Salt Creek Trail, near Eagle Park, to Phase 1 of the Salt Creek Trail, near the Brown County YMCA. The need for this project stems from the lack of connected trails between Nashville and the Brown County State Park. The purpose of this project is to connect existing trails to provide a safe route for pedestrians between downtown Nashville and Brown County State Park.

Existing Conditions: The project area consists of existing right-of-way and unimproved land along North Fork Salt Creek. A portion of the existing area is forested floodplain with a mowed path, which was maintained by the property owner (Attachments: Page 8). The remaining area is undisturbed forested floodplain, row crop field, or unmaintained right-of-way associated with SR 46 and Parkview Road.

Proposed Project: The proposed project consists of an asphalt-paved shared-use path with one stream crossing. This segment of the trail would be approximately 1.36 miles in length and 10 to 12 feet in width, with 2-foot graded shoulders on each side. The east end of the trail would begin at a relocated historic bridge (Des. 1400365), at the terminus of Phase 2 of the Salt Creek Trail, approximately 1.21 mile southeast of the SR 46/SR 135 intersection. The proposed alignment has a winding path towards the west, generally along North Fork Salt Creek. It would have an at-grade crossing over Parkview Road, cross the stream via a pedestrian bridge, and terminate at Phase 1 of the Salt Creek Trail, near the Brown County YMCA (Attachments: Page 1). The pedestrian bridge over North Fork Salt Creek will be a single span, 92-foot long, 14-foot wide prestressed concrete I-beam bridge. To avoid impacts to resources, the trail alignment would be designed to best fit the mowed path on the eastern side, and the edge of the forest as it moves west. It is anticipated that approximately 4 acres of trail easement, 8.5 acres of permanent right-of-way, and 0.5 acre of temporary right-of-way will be required. Most of the trail construction will not require maintenance of traffic, except along Parkview Road where one lane of traffic will be maintained.

Environmental Concerns:
The USGS 7.5-minute quadrangle topographical map depicts North Fork Salt Creek as a perennial stream (solid blue line) (Attachments: Page 2). Parsons environmental staff conducted waters investigations to determine the presence of jurisdictional streams and wetlands (Note, the investigations were split into two separate reports, called Salt Creek Trail, Phase 3A and Phase 3B). Parsons identified four likely jurisdictional streams and nine wetlands within the study areas, draft findings are depicted on the attached GIS-Based Water Resources maps (Attachments: Page 3). Two waters of the US reports have been prepared to document likely jurisdictional water resources in the project area. Coordination is ongoing with the US Army Corps of Engineers (USACE) and the Indiana Department of Environmental Management (IDEM). All applicable permits will be applied for and acquired before construction can begin. Parsons will continue to work in coordination with INDOT Ecology and Waterway Permitting Office (EWPO) to determine the presence and impacts to ecological resources.

This project is within the range of the federally endangered Indiana bat (*Myotis sodalis*) and federally threatened northern long-eared bat (*Myotis septentrionalis*). The Indiana Bat and Northern Long-eared Bat Range-Wide Standard Informal Programmatic Consultation is anticipated to be applied to this project. Project information was uploaded to the USFWS's Information for Planning and Consultation (IPaC) website to identify if any species listed or proposed to be listed may be present in the area of the proposed action (Consultation Code: 03E12000-2020-SLI-0001). No species, other than bats, were listed. The project is anticipated to clear trees more than 300 feet from existing paved surfaces. Therefore, further coordination with INDOT Environmental Services and USFWS will occur.

Regarding Section 106 of the National Historic Preservation Act, the Minor Projects Programmatic Agreement (MPPA) Category B-8 is anticipated to apply to this project. Coordination with INDOT's Cultural Resources Office (CRO) will occur.

The project will convert more than one acre of farmland to a transportation (trail) use. Therefore, a partially-completed NRCS CPA 106 Form is attached to the copy of this letter being sent to the Natural Resources Conservation Service (NRCS).

Please respond with your comments on any environmental impacts associated with this project. **Should we not receive your response within thirty (30) calendar days from the date of this letter, it will be assumed that your agency feels that there will be no adverse effects incurred as a result of the proposed project.** However, should you find that an extension to the response time is necessary, a reasonable amount may be granted upon request. The Project Manager, Roy Carlsgaard, can be contacted at (317) 840-0026 or via email at roy@ixoyeengineering.com. If you have any questions regarding this matter, please contact me at (317) 616-1021 or via e-mail at Keaton.Veldkamp@parsons.com. Thank you in advance for your input.

Sincerely,

Keaton Veldkamp
Associate Environmental Planner
Parsons

Attachments: Graphics

The following agencies received Early Coordination Letters:

Federal Highway Administration
Federal Office Building
575 N. Pennsylvania St., Room 254
Indianapolis, IN 46204

Manager, Public Hearings
Indiana Department of Transportation
100 N. Senate Avenue, Rm. 642
Indianapolis, IN 46204

INDOT Seymour District
Environmental Services
185 Agrico Ln.
Seymour, IN 47274

Field Supervisor
U.S. Fish and Wildlife Service
Bloomington Indiana Field Office
620 South Walker Street
Bloomington, Indiana 47403-2121

Environmental Coordinator
Indiana Department of Natural Resources
Division of Fish and Wildlife
Room W264, IGC South
402 W. Washington St.
Indianapolis, IN 46204

State Conservationist
Natural Resources Conservation Service
6013 Lakeside Blvd.
Indianapolis, IN 46278

Forest Supervisor
Hoosier National Forest
U.S. Forest Service
811 Constitution Avenue
Bedford, Indiana 47421

Regional Environmental Coordinator
Midwest Regional Office
National Park Service
601 Riverfront Dr.
Omaha, NE 68102

Town Council President
P.O. Box 446
200 Commercial St.
Nashville, IN 47448

Indiana Geological and Water Survey
420 N. Walnut St.
Bloomington, IN 47404
(Electronic Coordination)

Indiana Department of Environmental Management
100 N. Senate Ave.
Indianapolis, IN 46204
(Electronic Coordination)

U.S. Army Corps of Engineers Louisville District
ATTN: CELRL-RDN
P.O. Box 59
Louisville, KY 40201

Field Environmental Officer
Chicago Regional Office
US Department of Housing & Urban Development
Metcalf Fed. Bldg., Room 2401
77 W. Jackson Blvd.
Chicago, IL 60604

Superintendent
Brown County Schools
357 E. Main St.
Nashville, IN 47448

Brown County Parks and Recreation
1001 Deer Run Lane
Nashville, IN 47448

Brown County YMCA
105 Willow St.
Nashville, IN 47448

Brown County Commissioners
P.O. Box 151
Nashville, IN 47448

Highway Superintendent
Brown County Highway Department
P.O Box 2088
711 Greasy Creek Rd.
Nashville, IN 47448

Brown County State Park
P.O. Box 608
Nashville, IN 47448

THIS IS NOT A PERMIT

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

DNR #: ER-21912 **Request Received:** October 11, 2019

Requestor: Parsons
Keaton Veldkamp
101 West Ohio Street, Suite 2121
Indianapolis, IN 46204

Project: Salt Creek Trail, Phase 3: construction of a multi-use trail from Phase 2 near Eagle Park to Phase 1 near the YMCA, and new pedestrian bridge over North Fork Salt Creek, about 0.53 mile southeast of the SR46/SR 135 intersection; Des #1382874

County/Site info: Brown

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

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

Regulatory Assessment: This proposal will require the formal approval for construction in a floodway under the Flood Control Act, IC 14-28-1. Please submit a copy of this letter with the permit application.

Natural Heritage Database: The Natural Heritage Program's data have been checked.
Brown County State Park and the state threatened Purple Flowering Raspberry (Rubus odoratus) have been documented within 1/2 mile of the project area. The Division of Nature Preserves does not foresee any impacts to the plant species as a result of this project.

Fish & Wildlife Comments: As proposed, this project will result in significant environmental impacts to fish, wildlife and botanical resources. The Division of Fish and Wildlife highly recommends that an alternative analysis be conducted and that an alignment minimizing the environmental impacts be considered.

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

A) Trail Alignment Impacts:
North/upstream of the maintained grassy area, the proposed alignment will impact a relatively undisturbed area of closed-canopy forested riparian habitat which contains several forested wetland inclusions, thereby forming a forested wetland complex. Mitigation for the proposed impacts would likely be extremely difficult as increasing habitat complexity vastly increases the difficulty of mitigation and the likelihood of mitigation site failure.

Impacts to the forested riparian corridor on the left bank are more likely to severely degrade the health of the creek as there is little or no forested riparian habitat providing the same environmental functions and values on the right bank of the creek. There is ample space on the right bank (opposite of the proposed trail alignment) that would result in almost total avoidance of impacts to fish, wildlife and botanical resources. While any impacts to forested habitat should be avoided and minimized whenever possible, any tree removal and clearing on the left bank where the forested riparian

corridor along the creek is sparse and mostly absent would have substantially fewer impacts than the same footprint in a previously-undisturbed closed-canopy forested area containing a matrix of wetland and non-wetland habitats.

B) Forest Fragmentation:
The proposed work will also result in substantial indirect impacts in the form of forest habitat fragmentation. Habitat loss and fragmentation are the main causes of the decline of wildlife. Habitat 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.

The placement of a trail on the side of the creek containing an intact forested riparian corridor is a significant secondary impact as wooded riparian corridors are significant habitat features used by wildlife for travel between larger habitat areas or through congested urban areas. Wooded riparian corridors provide valuable habitat for fish, wildlife, and botanical resources and provide the following environmental benefits:
1. Help cool the stream temperature, which improves insect and fish habitat.
2. Establish complex root system from trees, shrubs, and grasses, which helps retain soil.
3. Naturally remove phosphorus and nitrogen products from runoff water.
4. Increase infiltration of water into the soil and slow the runoff.
5. Decrease stream sediment load.

C) Indirect Impacts:
Additional indirect impacts are likely due to human presence and disturbance within a natural area previously devoid of any human activity. A recent scientific literature review of non-consumptive recreation's effects on animals revealed that "over 93% of reviewed articles documenting at least one effect of recreation on animals, the majority of which (59%) were classified as negative effects." Non-motorized recreation showed more evidence of negative effects than motorized recreation (Larson, C. L., et al. (2016). "Effects of Recreation on Animals Revealed as Widespread through a Global Systematic Review." PloS one 11(12): e0167259. In open areas where space allows and near sensitive environments such as wetland, a physical and visual barrier of tall native herbaceous buffers may be beneficial to reduce the disturbance potential for wildlife.

D) Recommended Alternative Alignments:
The alignment having the lowest direct and indirect impacts to fish and wildlife habitat would be the recommended alignment where the trail crosses the creek near SR 46 and is placed no closer than 35' from the top of the bank on the right bank which currently has little or no forested habitat due to agricultural use.

Another potentially environmentally-acceptable alignment (originally proposed by another company as part of ER-12002 in 2006) used an existing gas line easement heading southwest from Parkview Road near the base of the hill. Since it is a cleared easement, it would result in little or no forested habitat impacts. Due to potential wetlands along this easement, observed during the site inspection in 2006, the trail might require an elevated section (i.e. raised boardwalks) to both minimize impacts to wetlands and allow uninterrupted wildlife movement across the easement from the forested hillside to the bottomland forest area.

E) Riparian Habitat Mitigation:
Impacts to forested habitat from temporary construction, access, or staging are considered permanent in terms of mitigation required. This is due to the decades-long

timeframe required for trees to develop into a mature forest. While replanting an area of "temporary" forested wetland impacts is acceptable and expected, off-site mitigation may be required depending on the applicable mitigation ratio.

We recommend a mitigation plan be developed (and submitted with the permit application) for any unavoidable habitat impacts that will occur. The DNR's Floodway Habitat Mitigation guidelines (and plant lists) can be found online at: http://www.in.gov/legislative/iac/20190130-IR-312190041NRA.xml.pdf.

Impacts to non-wetland forest of one (1) acre or more should be mitigated at a minimum 2:1 ratio. If less than one acre of non-wetland forest is removed in a rural setting, replacement should be at a 1:1 ratio based on area. Impacts to non-wetland forest under one (1) acre in an urban setting should be mitigated by planting five trees, at least 2 inches in diameter-at-breast height (dbh), for each tree which is removed that is 10" dbh or greater (5:1 mitigation based on the number of large trees). The mitigation ratio may be increased as a result of the indirect and cumulative impacts of the proposed project.

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

F) Wetland Habitat:
Due to the presence or potential presence of wetland habitat on site, we recommend contacting and coordinating with the Indiana Department of Environmental Management (IDEM) 401 program and also the US Army Corps of Engineers (USACE) 404 program. Impacts to wetland habitat should be mitigated at the appropriate ratio according to the 1991 INDOT/IDNR/USFWS Memorandum of Understanding.

G) Bank Stabilization:
The Division of Fish and Wildlife recommends the use of a bridge with a bank-to-bank design where the abutments are landward of the tops of the banks. If the pedestrian bridge will require in-stream construction, do not place riprap across the stream bed, or in the stream bed except at the edges of the structure to protect the footings and at the toe of the stream banks.

Where the use of riprap is necessary, limit its use on the channel banks to toe protection, with a bioengineered method and material used above the rock toe (i.e. heavy duty erosion control blankets, turf reinforcement mats or a similar bioengineering method). Erosion control blankets, turf reinforcement mats and other similar materials should be seeded with native plants to allow a natural, vegetated stream bank to develop. Information about bioengineering techniques can be found at http://www.in.gov/legislative/iac/20120404-IR-312120154NRA.xml.pdf. Also, the following is a USDA/NRCS document that outlines many different bioengineering techniques for streambank stabilization: http://directives.sc.egov.usda.gov/17553.wba.

H) Causeways and Runarounds:
If possible, the project design should avoid inclusion of a temporary causeway or runaround. Such features result in impacts to the stream and surrounding habitat. In many cases, the need for a causeway can be eliminated by working from either bank, or using temporary, easily removed structures such as timber mats. If a causeway is deemed critical for the construction to occur, please submit a justification for the necessity of the causeway with any permit application.

Impacts related to causeways can be reduced by creating a partial causeway that does not span the entire channel, leaving one side or the middle of the channel open and flowing at all times. If a full causeway is absolutely necessary, impacts to the waterway from its installation and removal can be reduced by minimizing the amount of time the causeway is in place, reducing the temporary causeway width, using more and larger culvert pipes, placing filter fabric under the aggregate fill to reduce impacts during the removal of the causeway, using larger size aggregate, and removing sections of the causeway as portions of the bridge are completed. Do not use fines or soil in the temporary causeway.

I) Cofferdams:
Any proposed dewatering should be detailed using the following guidelines:
1. Dewatering should be limited to one streambank or side of the creek (at the bridge construction site) at a time so at least half of the creek is always flowing naturally. On larger streams, both sides can be dammed at once as long as the center of the channel is allowed to flow naturally.
2. Do not dewater directly into the stream. Dewater into a sediment bag, into a roll off box, and onto a riprap apron or similar system.
3. Cofferdam materials and methods can vary. Self-contained and encapsulated materials and methods are recommended. Anything filled with water is better than soil-filled where there is a potential for leaking or failure of the system due to length of use or accidents.
4. Dewatering pumps should incorporate filters or bypasses to avoid injuring or killing fish and other aquatic organisms.

J) Lighting:
The International Dark-Sky Association (IDA) states that, to minimize the negative impacts of artificial lighting on wildlife, "lighting should only be on when needed, only light the area that needs it, be no brighter than necessary, minimize blue light emissions, [and] be fully shielded (pointing downward)". The Division of Fish and Wildlife strongly encourages visiting the IDA's website to learn more about selecting lighting fixtures that minimize the harmful effects of lighting on humans and wildlife: http://darksky.org/lighting/lighting-basics/.

K) Trail Guidelines:
The following is a basic list of recommendations from IDNR Division of Fish and Wildlife to consider when planning trails to minimize impacts to fish, wildlife, and botanical resources. For #7 below on this particular project, since there is an already disturbed/deforested corridor through a wetland from the gas line easement, it would be acceptable to place a raised boardwalk through the wetland, so only at-grade trails are not recommended in this case. A raised boardwalk through a wetland in a cleared easement is recommended over placing the trail through forested floodway and forested wetland habitats.

1. Place the trail in or adjacent to existing right-of-ways where possible to minimize significant impacts to natural resource habitat. Also, utilize previously disturbed or degraded areas. Align the trail along or near existing man-made edges or areas that have the potential to be restored or enhanced by trail construction (i.e. railroad corridors), rather than routing the trail through previously undisturbed areas.
2. When designing or constructing a trail, disturb as narrow an area as possible to help minimize negative impacts. Where significant impacts to fish, wildlife or botanical resources are likely due to the trail's width, reduce the width to help avoid those impacts. ADA accessibility standards allow departures from the standards under certain conditions, including substantial harm to natural features, habitat, or vegetation (see https://www.access-board.gov/attachments/article/1637/outdoor-guide.pdf, Outdoor developed areas: a summary of accessibility standards for Federal outdoor

developed areas).
3. Do not focus only on the direct impact of the trail's width; also consider the trail's impact to the surrounding habitat. Trails can fragment larger habitat areas and reduce the overall usefulness of the site to fish, wildlife, or botanical resources (1 large habitat block is better than 2 small habitat blocks). Trails can cause significant impacts to forested areas, riparian forested corridors along creeks and rivers, and wetland areas. They also may cause sediment and erosion issues or introduce human disturbance into fairly isolated areas containing wildlife habitat.
4. Avoid unnecessary stream crossings. Instead, make use of or modify existing stream crossings or avoid crossing the stream altogether. Where stream crossings are unavoidable, pedestrian bridges with supports/abutments placed no less than 10 feet landward from the tops of the banks on each side of the waterway are recommended. Alternatively, a three-sided culvert may be used. Three-sided culverts should be oversized to allow terrestrial wildlife movement along the creek on unsubmerged dry land at normal water levels. Box-culvert or pipe-culvert crossings are not recommended.
5. Trails designed to follow a stream's course must be placed outside the stream's forested riparian buffer. Also, do not place the trail along the tops of the banks of a forested creek. Avoid perpendicular fragmentation of riparian areas (streamside habitat). Where the stream has little or no forested riparian buffer, the trail should be no closer than 15 feet from the tops of the banks.
6. Avoid elements identified in the Natural Heritage Database; trails may negatively affect species that require specific natural conditions (vegetation, light levels, moisture, etc.) that are altered as a result of trail construction. Rare and high quality habitats, and wildlife habitats that possess high wildlife abundance and diversity, should be avoided by placing the trail around the habitat and screening it from the trail and trail users with a buffer of native vegetation or another method as discussed below. Wetlands and karst features are but two examples of areas to avoid.
7. Raised boardwalks should be constructed in wet areas or near wetlands (trails through wetlands are not recommended). A material such as composite decking should be used rather than treated wood which can leach elements toxic to aquatic life.
8. Screen wildlife habitat from the trail corridor. Vegetation, topography, and fences can help reduce the impact of noise and line of site disturbances of trail users on wildlife. Walls can create wildlife movement barriers and potential impacts must be considered. Native grass buffers (2 to 3 feet tall) are recommended along the edge of trails near habitat such as wetlands.
9. Lighting should only be used when absolutely necessary. Lighting in forested areas and along creeks, streams, and rivers should be the lowest intensity feasible and shielded to cast light on the path and not diffused into the surroundings to avoid disturbing wildlife circadian rhythms and disorienting night-migrating birds.
10. Any plantings in the riparian areas should be locally native species, not exotic species or horticultural varieties (e.g. "Autumn Blaze" Red Maple). A list of appropriate native woody and herbaceous vegetation can be provided upon request.
11. Trail surfaces can have negative effects on surrounding natural areas and deter movement of some species across the trail. Some surface materials are more environmentally acceptable than others, such as mulch and mown grass which should be considered as the first options. Asphalt is not recommended as a trail surface in the floodway. The conventional maintenance for aging asphalt is to seal it with a blacktop or asphalt sealer. Research has shown that as these sealers break down over time, they move into the aquatic environment and are highly toxic to aquatic life. If asphalt is used then asphalt sealer should not be used for long-term maintenance and repair of the asphalt trail surface. In previously disturbed areas, concrete is an acceptable surface material, and porous concrete is preferred wherever it can be used.
12. Shoulders should be constructed using unconsolidated materials where possible. In some situations, solid shoulders are necessary. In those cases, shoulders should be constructed using porous concrete.

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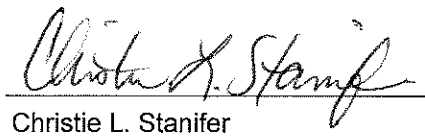
Division of Fish and Wildlife
Early Coordination/Environmental Assessment

13. Trails that highlight natural resources should skirt the resource and utilize "pulloffs" at specific sites instead of letting the entire trail and traffic disturb the resource.

The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:
1. Revegetate all bare and disturbed areas with a mixture of native grasses, sedges, wildflowers, and also native hardwood trees and shrubs if any woody plants are disturbed during construction as soon as possible upon completion. Do not use any varieties of Tall Fescue or other non-native plants, including prohibited invasive species (see 312 IAC 18-3-25).
2. Minimize and contain within the project limits inchannel disturbance and the clearing of trees and brush.
3. Do not work in the waterway from April 1 through June 30 without the prior written approval of the Division of Fish and Wildlife.
4. Do not cut any trees suitable for Indiana bat or Northern Long-eared bat roosting (greater than 5 inches dbh, living or dead, with loose hanging bark, or with cracks, crevices, or cavities) from April 1 through September 30.
5. Use minimum average 6 inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids.
6. Plant native hardwood trees along the top of the bank and right-of-way to replace the vegetation destroyed during construction.
7. Post "Do Not Mow or Spray" signs along the right-of-way.
8. 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.
9. Seed and protect all disturbed streambanks and slopes not protected by other methods that are 3:1 or steeper with erosion control blankets that are heavy-duty, biodegradable, and net free or that use loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.

Contact Staff: 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.



Date: November 12, 2019

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

Indiana Department of Environmental Management

We Protect Hoosiers and Our Environment.

100 North Senate Avenue - Indianapolis, IN 46204
(800) 451-6027 - (317) 232-8603 - www.idem.IN.gov

Brown County

201 Locus Lane PO Box 151
Nashville , IN 47448
Date

Parsons
Keaton Veldkamp
101 W Ohio Street
Indianapolis , IN 46204

Dear Grant Administrator or Other Finance Approval Authority:

RE: Brown County, Indiana is planning a shared-use path southeast of Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail, approximately 0.53 mile southeast of the SR 46/SR 135 intersection. A portion of this path is within the incorporated limits of Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail. This segment of the trail would connect Phase 2 of the Salt Creek Trail, near Eagle Park, to Phase 1 of the Salt Creek Trail, near the Brown County YMCA. The need for this project stems from the lack of connected trails between Nashville and the Brown County State Park. The purpose of this project is to connect existing trails to provide a safe route for pedestrians between downtown Nashville and Brown County State Park. The project area consists of existing right-of-way and unimproved land along North Fork Salt Creek. A portion of the existing area is forested floodplain with a mowed path, which was maintained by the property owner. The remaining area is undisturbed forested floodplain, row crop field, or unmaintained right-of-way associated with SR 46 and Parkview Road. The proposed project consists of an asphalt-paved shared-use path with one stream crossing. This segment of the trail would be approximately 1.36 miles in length and 10 to 12 feet in width, with 2-foot graded shoulders on each side. The east end of the trail would begin at a relocated historic bridge (Des. 1400365), at the terminus of Phase 2 of the Salt Creek Trail, approximately 1.21 mile southeast of the SR 46/SR 135 intersection. The proposed alignment has a winding path towards the west, generally along North Fork Salt Creek. It would have an at-grade crossing over Parkview Road, cross the stream via a pedestrian bridge, and terminate at Phase 1 of the Salt Creek Trail, near the Brown County YMCA (Attachments: Page 1). The pedestrian bridge over North Fork Salt Creek will be a single span, 92-foot long, 14-foot wide prestressed concrete I-beam bridge. To avoid impacts to resources, the trail alignment would be designed to best fit the mowed path on the eastern side, and the edge of the forest as it moves west. It is anticipated that approximately 4 acres of trail easement, 8.5 acres of permanent right-of-way, and 0.5 acre of temporary right-of-way will be required. Most of the trail construction will not require maintenance of traffic, except along Parkview Road where one lane of traffic will be maintained. The USGS 7.5-minute quadrangle topographical map depicts North Fork Salt Creek as a perennial stream (solid blue line). Parsons environmental staff conducted waters investigations to determine the presence of jurisdictional streams and wetlands. Parsons identified four likely jurisdictional streams and nine wetlands within the study areas.

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.

2. 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 large-scale 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.

7. 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.
10. 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:

1. 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.

2. 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.)

6. 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

Brown County, Indiana is planning a shared-use path southeast of Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail, approximately 0.53 mile southeast of the SR 46/SR 135 intersection. A portion of this path is within the incorporated limits of Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail. This segment of the trail would connect Phase 2 of the Salt Creek Trail, near Eagle Park, to Phase 1 of the Salt Creek Trail, near the Brown County YMCA. The need for this project stems from the lack of connected trails between Nashville and the Brown County State Park. The purpose of this project is to connect existing trails to provide a safe route for pedestrians between downtown Nashville and Brown County State Park. The project area consists of existing right-of-way and unimproved land along North Fork Salt Creek. A portion of the existing area is forested floodplain with a mowed path, which was maintained by the property owner. The remaining area is undisturbed forested floodplain, row crop field, or unmaintained right-of-way associated with SR 46 and Parkview Road. The proposed project consists of an asphalt-paved shared-use path with one stream crossing. This segment of the trail would be approximately 1.36 miles in length and 10 to 12 feet in width, with 2-foot graded shoulders on each side. The east end of the trail would begin at a relocated historic bridge (Des. 1400365), at the terminus of Phase 2 of the Salt Creek Trail, approximately 1.21 mile southeast of the SR 46/SR 135 intersection. The proposed alignment has a winding path towards the west, generally along North Fork Salt Creek. It would have an at-grade crossing over Parkview Road, cross the stream via a pedestrian bridge, and terminate at Phase 1 of the Salt Creek Trail, near the Brown County YMCA (Attachments: Page 1). The pedestrian bridge over North Fork Salt Creek will be a single span, 92-foot long, 14-foot wide prestressed concrete I-beam bridge. To avoid impacts to resources, the trail alignment would be designed to best fit the mowed path on the eastern side, and the edge of the forest as it moves west. It is anticipated that approximately 4 acres of trail easement, 8.5 acres of permanent right-of-way, and 0.5 acre of temporary right-of-way will be required. Most of the trail construction will not require maintenance of traffic, except along Parkview Road where one lane of traffic will be maintained. The USGS 7.5-minute quadrangle topographical map depicts North Fork Salt Creek as a perennial stream (solid blue line). Parsons environmental staff conducted waters investigations to determine the presence of jurisdictional streams and wetlands. Parsons identified four likely jurisdictional streams and nine wetlands within the study areas.

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.

Dated Signature of the Public Owner Contact/Responsible Elected Official _____ SUPERINTENDENT/ERC Feb 26, 2020

Dated Signature of the Project Planner/Consultant Contact Person _____ 2/25/2020

Keaton Veldkamp

Organization and Project Information

Project ID:
Des. ID: 1382874
Project Title: Salt Creek Trail Phase 3
Name of Organization: Parsons
Requested by: Keaton Veldkamp

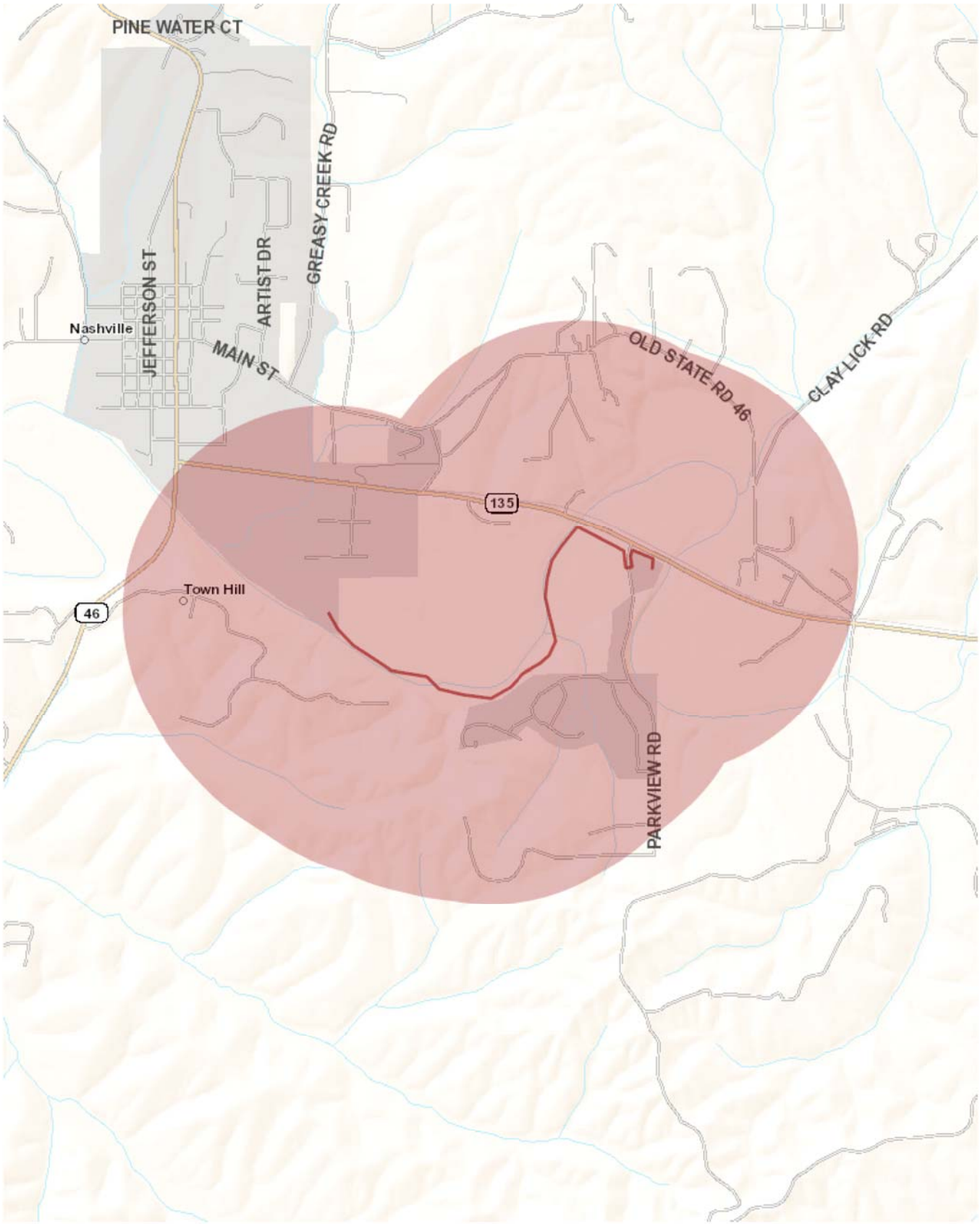
Environmental Assessment Report

1. Geological Hazards:
    - High liquefaction potential
    - Floodway
2. Mineral Resources:
    - Bedrock Resource: Moderate Potential
    - Sand and Gravel Resource: Low Potential
3. Active or abandoned mineral resources extraction sites:
    - None documented in the area

*All map layers from Indiana Map (maps.indiana.edu)

This information was furnished by Indiana Geological Survey
Address: 420 N. Walnut St., Bloomington, IN 47404
Email: IGSEnvir@indiana.edu
Phone: 812 855-7428

Date: October 11, 2019



Metadata:

- https://maps.indiana.edu/metadata/Geology/Seismic_Earthquake_Liquefaction_Potential.html
- https://maps.indiana.edu/metadata/Geology/Industrial_Minerals_Sand_Gravel_Resources.html
- https://maps.indiana.edu/metadata/Hydrology/Floodplains_FIRM.html
- https://maps.indiana.edu/metadata/Geology/Bedrock_Geology.html

USDA
United States Department of Agriculture

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

November 1, 2019

Keaton Veldkamp
Parsons
101 West Ohio Street, Suite 2121
Indianapolis, Indiana 46204

Dear Mr. Veldkamp:

The proposed project to proceed with Phase 3 of the Salt Creek Trail in Nashville, Brown County, Indiana (Des. No 1382874), as referred to in your letter received October 11, 2019, will cause a conversion of prime farmland.

The attached packet of information is for your use competing Parts VI and VII of the AD-1006. After completion, the federal funding agency needs to forward one copy to NRCS for our records.

If you need additional information, please contact Daniel Phillips at 317-295-5871.

Sincerely,

JERRY RAYNOR Digitally signed by JERRY RAYNOR
Date: 2019.11.06 11:02:31 -05'00'

JERRY RAYNOR
State Conservationist

Enclosures

U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service

NRCS-CPA-106
(REV.3-02)

FARMLAND CONVERSION IMPACT RATING FOR CORRIDOR TYPE PROJECTS

PART I *(To be completed by Federal Agency)*	3. Date Of Land Evaluation Request: **10/11/2019**	4. Sheet 1 of **2**
1. Name of Project: **Salt Creek Trail Phase 3, Des. 1382874**	5. Federal Agency Involved: **FHWA**	
2. Proposed Land Use: **Asphalt multi-use path**	6. County and State: **Brown County, Indiana**	
PART II *(To be completed by NRCS)*	1. Date Request Received By NRCS **10/15/2019**	2. Person Completing Form: **JRA**

3. Does the corridor contain prime, unique, statewide or local important farmland? YES ☑ NO ☐ *(If no, the FPPA does not apply - do not complete additional parts of this form)*		4. Acres Irrigated	Average Farm Size **81.00**
5. Major Crop(s) **Corn**	6. Farmable Land In Government Jurisdiction Acres: **91,391.0** % **45.0**	7. Amount of Farmland As Defined in FPPA Acres: **18,976.0** % **21.0**	
8. Name of Land Evaluation System Used **LESA**	9. Name of State or Local Site Assessment System	10. Date Land Evaluation Returned by NRCS **11/01/2019**	

PART III *(To be completed by Federal Agency)*	Alternative Corridor For Segment: Corridor A	Corridor B	Corridor C	Corridor d
A. Total Acres To Be Converted Directly	**12.25**			
B. Total Acres To Be Converted Indirectly	**0.00**			
C. Total Acres In Site	**12.25**	**0.00**		
PART IV *(To be completed by NRCS)* Land Evaluation Information				
A. Total Acres Prime And Unique Farmland	**12.25**			
B. Total Acres Statewide Important or Local Important Farmland	**0.00**			
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted	**0.0**			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value	**40.0**			
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)	**73**			

PART VI *(To be completed by Federal Agency)* Corridor Assessment Criteria *(Criteria are explained in 7 CFR 658.5 b & c. For Non-Corridor project use form AD-1006)*	Maximum Points	Corridor A	Corridor B	Corridor C	Corridor D
1. Area In Non-urban Use	(15)	**8**			
2. Perimeter In Non-urban Use	(10)	**8**			
3. Percent Of Corridor Being Farmed	(20)	**2**			
4. Protection Provided By State and Local Government	(20)	**0**			
5. Size Of Present Farm Unit Compared To Average	(10)	**10**			
6. Creation Of Non-farmable Farmland	(25)	**0**			
7. Availability Of Farm Support Services	(5)	**5**			
8. On-Farm Investments	(20)	**10**			
9. Effects Of Conversion On Farm Support Services	(25)	**0**			
10. Compatibility With Existing Agricultural Use	(10)	**2**			
TOTAL CORRIDOR ASSESSMENT POINTS	160	**45**	**0**		
PART VII *(To be completed by Federal Agency)*					
Relative Value Of Farmland *(From Part V)*	100	**73**	**0**		
Total Corridor Assessment *(From Part VI above or local site assessment)*	160	**45**	**0**		
TOTAL POINTS ***(Total of above 2 lines)***	260	**118**	**0**		

1. Corridor Selected:	2. Total Acres of Farmlands to be Converted by Project:	3. Date Of Selection	4. Was A Local Site Assessment Used?
A	**12.25**	**12/17/2019**	YES ☐ NO ☑

5. Reason For Selection:

The selected site meets the purpose and need of the project.

Name of Federal agency representative completing this form: **Keaton Veldkamp** | Date: **12/17/2019**

NOTE: Complete one form for each segment with more than one Alternate Corridor

(See Instructions on reverse side)

Form NRCS-CPA-106 (03-02)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Indiana Ecological Services Field Office
620 South Walker Street
Bloomington, IN 47403-2121
Phone: (812) 334-4261 Fax: (812) 334-4273
http://www.fws.gov/midwest/Endangered/section7/s7process/step1.html

In Reply Refer To:
Consultation Code: 03E12000-2020-SLI-0001
Event Code: 03E12000-2020-E-01991
Project Name: Des. 1382874 Salt Creek Trail Phase 3

December 17, 2019

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The attached species list identifies any federally threatened, endangered, proposed and candidate species that may occur within the boundary of your proposed project or may be affected by your proposed project. The list also includes designated critical habitat if present within your proposed project area or affected by your project. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation.

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service if they determine their project “may affect” listed species or critical habitat.

Under 50 CFR 402.12(e) (the regulations that implement Section 7 of the Endangered Species Act) the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally. You may verify the list by visiting the ECOS-IPaC website http://ecos.fws.gov/ipac/ at regular intervals during project planning and implementation and completing the same process you used to receive the attached list. As an alternative, you may contact this Ecological Services Field Office for updates.

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

determine if your project will have an adverse effect on listed species and will help lead you through the Section 7 process.

For all **wind energy projects** and **projects that include installing towers that use guy wires or are over 200 feet in height**, please contact this field office directly for assistance, even if no federally listed plants, animals or critical habitat are present within your proposed project or may be affected by your proposed project.

Although no longer protected under the Endangered Species Act, be aware that bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*) and Migratory Bird Treaty Act *(*16 U.S.C. 703 *et seq*), as are golden eagles. Projects affecting these species may require measures to avoid harming eagles or may require a permit. If your project is near an eagle nest or winter roost area, see our Eagle Permits website at http://www.fws.gov/midwest/midwestbird/EaglePermits/index.html to help you determine if you can avoid impacting eagles or if a permit may be necessary.

We appreciate your concern for threatened and endangered species. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

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

This species list is provided by:

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

Project Summary

Consultation Code: 03E12000-2020-SLI-0001

Event Code: 03E12000-2020-E-01991

Project Name: Des. 1382874 Salt Creek Trail Phase 3

Project Type: TRANSPORTATION

Project Description: Brown County, Indiana is planning a pedestrian trail located in Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail, the western end of the trail begins approximately 0.54 mile southeast of the intersection of SR 46/SR 135. The need for this project stems from the lack of safe pedestrian access between Nashville and the Brown County State Park. The purpose of this project is to provide a safe route for pedestrians between downtown Nashville and Brown County State Park, while promoting community health and economic growth.

The existing conditions include an undisturbed forested floodplain, a row crop field, and unmaintained right-of-way associated with SR 46 and Parkview road. This segment of the trail will connect Eagle Park to the Brown County YMCA. The east end of the trail will begin adjacent to Eagle Park, approximately 0.36 mile south of SR 46 and move north along Salt Creek, following it until it crosses the creek, via a pedestrian bridge, then moving northwest towards the Brown County YMCA. The trail will be approximately 1.32 miles in length. The project is located in a rural forested area, to the southeast of downtown Nashville. Land adjacent to the project consists of forested floodplain, a row crop field, the Brown County YMCA, Eagle Park, and a residential neighborhood.

Work for this project would include clearing trees and vegetation to construct the trail. The trail will be paved and utilize culverts and a pedestrian bridge over water resources. The trail will be approximately 10 to 12 feet in wide, with two foot graded shoulders on each side. This project will require permanent right-of-way. No maintenance of traffic will be necessary for this project to occur as it takes place entirely on new alignment.

Work for this project is scheduled to begin in 2021. Suitable summer habitat exists within and adjacent to the project area. Up to 3.5 acres of tree clearing/trimming is anticipated. The primary tree species observed within the project area were American sycamore (Platanus occidentalis), northern red oak (Quercus rubra), green ash (Fraxinus pennsylvanica), silver maple (Acer saccharinum), eastern red-cedar (Juniperus virginiana),

ash-leaf maple (acer negundo), black walnut (juglans nigra), red pine (Pinus resinosa), sugar maple (Acer saccharum), red maple (Acer rubrum), northern catalpa (Catalpa speciosa). Tree trimming/clearing will be limited to the inactive season. No temporary or permanent lighting is anticipated.

A review of the USFWS GIS database for Indiana bat and northern long-eared bat roosting, hibernacula, and capture sites was conducted for Des. 1382874 on March 9, 2018 and February 5, 2019 for the two halves of the project. There are no documented sites within a half mile of the project area. No existing bridges or culverts are located within the project area.

Project Location:

Approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/place/39.19755621677811N86.23976361147652W

Counties: Brown, IN

Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

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

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

---

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

Mammals

NAME	STATUS
Indiana Bat *Myotis sodalis* There is **final** critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5949 Species survey guidelines: https://ecos.fws.gov/ipac/guideline/survey/population/1/office/31440.pdf	Endangered
Northern Long-eared Bat *Myotis septentrionalis* No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: ▪ Incidental take of the NLEB is not prohibited here. Federal agencies may consult using the 4(d) rule streamlined process. Transportation projects may consult using the programmatic process. See www.fws.gov/midwest/endangered/mammals/nleb/index.html Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Critical habitats

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

PARSONS

101 West Ohio Street, Suite 2121 | Indianapolis, IN 46204
Direct: +1 317.616.1000 | Fax: +1 317.616.1033 | www.parsons.com

December 19, 2019

Robin McWilliams-Munson
U.S. Fish and Wildlife Service
Bloomington Field Office
620 South Walker Street
Bloomington, IN 47403-2121

RE: Standard Informal Consultation for the Indiana Bat and Northern Long-Eared Bat
Des. No.: 1382874
Description: Salt Creek Trail Phase 3
0.53 mile Southeast of the SR 46/SR 135 Intersection
Nashville, Brown County, Indiana
Consultation Code: 03E12000-2020-SLI-0001

Dear Ms. McWilliams-Munson,

The Indiana Department of Transportation (INDOT), is acting on behalf of FHWA, and submitting this letter for standard informal consultation for the Indiana bat, *Myotis sodalis,* and northern long-eared bat, *Myotis septentrionalis* (NLEB).

BACKGROUND
Brown County, Indiana is planning a shared-use path southeast of Nashville, Indiana. This project is Phase 3 of the Salt Creek Trail, approximately 0.53 mile southeast of the SR 46/SR 135 intersection (Attachments, pages 1 and 2). A portion of this path is within the incorporated limits of Nashville, Indiana. An early coordination letter that included the project's purpose and need was sent to you on October 11, 2019. An updated Official Species List was generated on the Information for Planning and Consultation (IPaC) website on December 17, 2019 (Consultation Code 03E12000-2020-SLI-0001).

Existing Conditions: The project area consists of existing right-of-way and unimproved land along North Fork Salt Creek (Attachments, page 3). A portion of the existing area is forested floodplain with a maintained path, which was maintained by the property owner. The remaining area is undisturbed forested floodplain, row crop field, or unmaintained right-of-way associated with SR 46 and Parkview Road. Photographs are provided in Attachments, pages 4 and 5.

Proposed Project: The proposed project consists of an asphalt-paved shared-use path with one stream crossing (Attachments, pages 6 to 20). This segment of the trail would be approximately 1.36 miles in length and 10 to 12 feet in width, with 2-foot graded shoulders on each side. The east end of the trail would begin at a relocated historic bridge (Des. 1400365), at the terminus of Phase 2 of the Salt Creek Trail, approximately 1.21 mile southeast of the SR 46/SR 135 intersection. The proposed alignment has a winding path towards the west, generally along North Fork Salt Creek. It would have an at-grade crossing over Parkview Road, cross the stream via a pedestrian bridge, and terminate at Phase 1 of the Salt Creek Trail, near the Brown County YMCA. The pedestrian bridge over North Fork Salt Creek will be a single span, 92-foot long, 14-foot wide prestressed concrete I-beam bridge.

To avoid impacts to resources, the trail alignment was designed to best fit the maintained path on the eastern side, and the edge of the forest as it moves west. It is anticipated that approximately 4 acres of trail easement, 8.5 acres of permanent right-of-way, and 0.5 acre of temporary right-of-way will be required. Most of the trail construction will not require maintenance of traffic, except along Parkview Road where one lane of traffic will be maintained. Work is scheduled to begin in 2021.

Existing Habitat and Bat Data: Suitable summer habitat is present within the project along the forested riparian corridor of North Fork Salt Creek. The forested areas are contiguous with Brown County State Park, located approximately 0.16 mile south of the project area. Tree species identified within the forested floodway include American sycamore (*Platanus occidentalis*), northern red oak (*Quercus rubra*), green ash (*Fraxinus pennsylvanica*), silver maple (*Acer saccharinum*), eastern red-cedar (*Juniperus virginiana*), ash-leaf maple (*Acer negundo*), black walnut (*Juglans nigra*), red pine (*Pinus resinosa*), sugar maple (*Acer saccharum*), red maple (*Acer rubrum*), northern catalpa (*Catalpa speciosa*), black locust (*Robinia psuedoacacia*), tuliptree (*Liriodendron tulipifera*), American elm (*Ulmus americana*), black willow (*Salix nigra*), and river birch (*Betula nigra*). Based on the presence of forested floodplains and contiguous blocks of forest, the location of this project is considered likely "suitable summer habitat."

A review of the USFWS database on March 9, 2018 and February 5, 2019 did not indicate the presence of endangered bat species in or within 0.5 mile of the project area.

Water Resources and Wetlands: Parsons identified four likely jurisdictional streams and nine wetlands within the study areas (preliminary maps were provided with the October 11, 2019 early coordination letter). These features will be avoided where possible; however, impacts cannot be entirely avoided due the presence of resources within the project area and the proposed stream crossing (pedestrian bridge) over North Fork Salt Creek. All applicable permits will be applied for and acquired before construction can begin.

Structures: There are no existing structures associated with this project.

Lighting: No temporary or permanent lighting is anticipated.

IMPACTS

The existing trees were surveyed and are shown on the attached plans (Attachments, pages 6 to 20). Existing trees were avoided wherever feasible. Impacts could not be avoided due to the presence of forested habitat within the project area.

Approximately 43 trees are proposed for clearing and/or trimming, which will occur during the inactive season. Most of the trees are located more than 300 feet from existing paved surfaces, as summarized in the following table.

Table 1. Tree Clearing Summary

Distance from existing paved surfaces	Approximate Number of Trees	Calculated Acreage[1]
Less than 100 feet	6	0.54
100 to 300 feet	0	0.00
Greater than 300 feet	37	2.97
TOTAL	**43**	**3.87**

[1] Each tree was multiplied by 0.09 acre per the "Single Tree Method" described on p53 of the *Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana Bat and Northern Long-Eared Bat*, revised February 2018. Source: https://www.fws.gov/midwest/endangered/section7/fhwa/pdf/BORevised02052018forIbatNLEB_FHWA_FRA_%20FTA.pdf

COMMITMENTS

The following commitments are proposed as Avoidance and Minimization Measures (AMMs) to reduce potential impacts to the Indiana bat and northern long-eared bat.

General AMM 1 – Ensure all operators, employees, and contractors working in areas of known or presumed bat habitat are aware of all FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable AMMs.

Tree Removal AMM 1 – Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to avoid tree removal.

Tree Removal AMM 2 – Time of year restrictions for tree removal shall be applied when bats are not likely to be present or tree removal shall be limited to 10 or fewer trees per project at any time of year within 100 feet of existing road or rail surfaces and outside of documented roosting and foraging habitat or travel corridors. A visual emergence survey shall be conducted with no bats observed. Tree removal may not occur during the active season for bats, from April 1 through September 30.

Tree Removal AMM 3 – Ensure tree removal is limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits).

The Contractor shall not handle dead or injured bats, regardless of species, and any other federally listed species that are found at the project site in order to preserve biological material in the best possible condition and to protect personnel from exposure to diseases, such as rabies. Project personnel shall ensure that any evidence about determining the cause of death or injury is not unnecessarily disturbed. Reporting the discovery of dead or injured listed species shall be required in all cases to enable the Service to determine whether the level of incidental take exempted by the biological opinion, BO, is exceeded, and to ensure that the terms and conditions are appropriate and effective. Parties finding a dead, injured, or sick specimen of any bat, regardless of species, or other endangered or threatened species, shall promptly notify the USFWS Bloomington Field Office at (812) 334-4261.

A "Reinitiation Notice" shall be required if: more than 3.87 acres of trees are to be cleared; the amount or extent of incidental take of Indiana bat or NLEB is exceeded; new information about listed species is encountered; new species is listed or critical habitat designated that the project may affect; the project is modified in a manner that causes an effect to the listed species; or, new information reveals that the project may affect listed species or critical habitat in a manner not considered in the BO or the project information.

CONCLUSION

Based on the review of existing data, assessment of likely suitable summer habitats, tree clearing quantities/mapping, and applied AMMs, the FHWA has determined the proposed project has an effect finding of "May Affect, Not Likely to Adversely Affect - with AMMs" for the federally endangered Indiana bat (*Myotis sodalis*) and the federally threatened northern long-eared bat (*Myotis septentrionalis*).

The FHWA is requesting USFWS concurrence with this project "May Affect, Not Likely to Adversely Affect - with AMMs" determination.

Please contact Juliet Port at juliet.port@parsons.com or (317) 616-4693 if you have any questions or require additional information. We appreciate your attention to this project.

Sincerely,

Juliet Port

Juliet Port, LPG
Senior Environmental Planner
Parsons

Attachments: Graphics

Graphics intentionally omitted to avoid duplication. Refer to Appendix B.

Port, Juliet

From: robin_mcwilliams@fws.gov
Sent: Thursday, January 16, 2020 12:57 PM
To: Hinkle, Meghan
Subject: Re: [EXTERNAL] FW: Standard Informal Bats Des1382874 Salt Creek Trail

Dear Meghan,

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (l6 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of l969, the Endangered Species Act of l973, as amended, and the U. S. Fish and Wildlife Service's Mitigation Policy.

According to the information you provided our office, the proposed project is the 3rd phase of the Salt Creek Trail project. It consists of an asphalt-paved shared-use path with multiple stream crossings. This segment of the trail would be approximately 1.36 miles in length and 10 to 12 feet in width, with 2-foot graded shoulders on each side. The east end of the trail would begin at a relocated historic bridge (Des. 1400365), at the terminus of Phase 2 of the Salt Creek Trail, approximately 1.21 mile southeast of the SR 46/SR 135 intersection. The proposed alignment has a winding path towards the west, generally along North Fork Salt Creek. It would have an at-grade crossing over Parkview Road, cross North Fork Salt Creek via a pedestrian bridge, and terminate at Phase 1 of the Salt Creek Trail, near the Brown County YMCA. The pedestrian bridge over North Fork Salt Creek will be a single span, 92-foot long, 14-foot wide prestressed concrete I-beam bridge. Additionally, there are four crossings of unnamed tributaries, one crossing of Wetland 1, plus three crossings of unnamed non-jurisdictional drainage features. These crossings will utilize 24- to 30-foot long culverts that range in diameter from 12 to 24 inches.

Approximately 43 trees are proposed for clearing and/or trimming, which will occur during the inactive season. Most of the trees (37) are located more than 300 feet from existing paved surfaces, and as such, use of the 2015-2016 FHWA, FRA, FTA Rangewide Programmatic Consultation for Indiana bats and northern long-eared bats, is not appropriate.

The project proponent has agreed to incorporate the following avoidance and minimization measures (where applicable):

General AMM 1 – Ensure all operators, employees, and contractors working in areas of known or presumed bat habitat are aware of all FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable AMMs.

Tree Removal AMM 1 – Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to avoid tree removal.

Tree Removal AMM 2 – Time of year restrictions for tree removal shall be applied when bats are not likely to be present or tree removal shall be limited to 10 or fewer trees per project at any time of year within 100 feet of existing road or rail surfaces and

outside of documented roosting and foraging habitat or travel corridors. A visual emergence survey shall be conducted with no bats observed. Tree removal may not occur during the active season for bats, from April 1 through September 30.

Tree Removal AMM 3 – Ensure tree removal is limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits).

Tree Removal AMM 4 - Do not remove documented Indiana bat or NLEB roosts that are still suitable for roosting, or trees within 0.25 miles of roosts, or documented foraging habitat any time of year.

RECOMMENDATIONS

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

1. Avoid all work within the inundated part of the stream channel (in perennial streams and larger intermittent streams) during the fish spawning season (April 1 through June 30), except for work within sealed structures such as caissons or cofferdams that were installed prior to the spawning season. No equipment should be operated below Ordinary High Water Mark during this time unless the machinery is within the caissons or on the cofferdams.

2. Restrict below low-water work to placement of piers, pilings and/or footings, shaping of the spill slopes around the bridge abutments, and placement of riprap.

3. Restrict channel work and vegetation clearing to the minimum necessary.

4. Construct new structures with a widened span and benches on one or both sides to provide for wildlife crossing, if practical. The crossing should be above normal high water, relatively flat and with natural substrate suitable for use by a wide variety of wildlife.

5. If riprap is utilized for bank stabilization, extend it below low-water elevation to provide aquatic habitat.

6. 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.

7. Re-vegetate all disturbed soil areas immediately upon project completion, using native trees and shrubs in the riparian zone wherever feasible.

8. Post DO NOT DISTURB signs at the construction zone boundaries and do not clear trees or understory vegetation outside the boundaries.

THREATENED AND ENDANGERED SPECIES

The proposed project is within the range of the federally endangered Indiana bat (*Myotis sodalis*) and the federally threatened northern long-eared bat (*Myotis septentrionalis*) (NLEB). There are numerous records of both species in Brown County.

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 drainage-ways in undeveloped areas. Like all other bat species in Indiana, the Indiana bat diet consists exclusively of insects.

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 ≥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 predominantly hibernate in caves and abandoned mine portals. Additional habitat types may be identified as new information is obtained.

Suitable summer habitat is present throughout the area surrounding the site, including wooded areas within the project boundary, although not enough habitat will be removed to affect the species'. The project proponent has stipulated that tree-clearing will be avoided during the maternity season for both bat species (**April 1 - September 30),** which will prevent incidental take from removal of an occupied roost tree. If this, and the other avoidance and minimization measures are implemented, we concur that the proposed project is not likely to adversely affect the Indiana bat or the northern long-eared bat.

This precludes the need for further consultation on this project as required under Section 7 of the Endangered Species Act of l973, as amended. However, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinitiate consultation.

Wetland and stream impacts may require permits from the US Army Corps of Engineers, the Indiana Department of Environmental Management's Water Quality Certification program and the Indiana Department of Natural Resources. Wetland impacts should be avoided, and any unavoidable impacts should be compensated for in accordance with the Corps of Engineers mitigation guidelines. 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. 207) or via email.

Sincerely,
Robin

Robin McWilliams Munson

U.S. Fish and Wildlife Service
620 South Walker Street
Bloomington, Indiana 46403
812-334-4261 x. 207 Fax: 812-334-4273

Monday, Tuesday - 7:30a-3:00p
Wednesday, Thursday - telework 8:30a-3:00p

On Wed, Jan 8, 2020 at 10:42 AM Hinkle, Meghan <MHinkle@indot.in.gov> wrote:

> Good Morning Robin,
>
> Attached is the standard informal letter for this project. It is ready for USFWS review.
>
> Let me know if you have any questions.
>
> Meghan Hinkle
>
> Major Projects / LPA Review Liaison
>
> Environmental Services Division
>
> Indiana Department of Transportation
>
> 100 N Senate Ave N642-ES
>
> Indianapolis, IN 46204-2216
>
> 317-232-1490

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Appendix D

Section 106 of the National Historic Preservation Act

Minor Projects PA Project Assessment Form – Category B Projects with Archaeology Work

Date: 9/14/2018 – revised 4/2/2020

Project Designation Number: 1382874

Route Number: N/A

Project Description: Salt Creek Trail Phases 3A and 3B

The proposed project is to build Phase 3 of a multi-use trail that will connect the town of Nashville, Indiana to Brown County State Park in Nashville, Washington Township, Brown County, Indiana. Phase 3A of the proposed trail is 3,711 feet long and 10 feet wide. Phase 3B is 3,080 feet long and will be approximately 10 feet wide. It will include an approximately 100-foot long pedestrian bridge across the North Fork of Salt Creek.

In 2018, INDOT-CRO determined that Phase 3A of the trail project met the conditions of B-8 of the MPPA. On February 3, 2020, INDOT-CRO received project information for Phase 3B of the trail. This revised form covers both Phase 3A and Phase 3B of the trail project. Category B-8 of the MPPA remains applicable. See below for details.

Feature crossed (if applicable): N/A

Township: Washington

City/County: Nashville, Brown County

Information reviewed (please check all that apply):

☑ General project location map ☑ USGS map ☑ Aerial photograph ☑ Interim Report

☐ Written description of project area ☐ General project area photos ☑ Soil survey data

☐ Previously completed historic property reports ☑ Previously completed archaeology reports

☐ Bridge Inspection Information ☑ SHAARD ☑ SHAARD GIS ☑ Streetview Imagery

Other (please specify): Brown County property records (accessed via https://brownin.wthgis.com/)

King, Brad
2006 Archaeological Field Reconnaissance, Salt Creek Trail, Project STP-9907( ); Des. No. 0401063, Brown County, Indiana. Archaeological Resources Management Service, Ball State University, Muncie.

Miller, Damian
2018 Phase Ia Archaeological Records Check and Reconnaissance Survey for the Proposed Phase 3A of the Salt Creek Trail, Washington Township, Brown County, Indiana (De. No. 1382874). Project 2018-IN644-1, ASC Group, Indianapolis.

Mustain, Chuck, Victoria E. Lushka, Kevin R. Schwarz, and Andrea Crider
2020 Phase Ia Archaeological Records Check and Reconnaissance Survey for the Proposed Phase 3B Section of the Salt Creek Trail (Des. No. 1382874), in Washington Township, Brown County, Indiana. Project 2019-IN644-03, ASC Group, Indianapolis.

Results of the Records Review for Above-Ground Resources:

With regard to above-ground resources, an INDOT Cultural Resources historian who meets the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61 performed a desktop review, checking the Indiana Register of Historic Sites and Structures (State Register) and National Register of Historic Places (National Register) lists for Brown County. No listed resources are located near the project area.

The *Brown County Interim Report* (1995; Washington Township Scattered Sites and Brown County State Park Scattered Sites) of the Indiana Historic Sites and Structures Inventory (IHSSI) was also consulted. The National Register & IHSSI information is available in the Indiana State Historic Architectural and Archaeological Research Database (SHAARD), and the Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBCM). The SHAARD and IHBBCM information was checked against the Interim Report hard copy maps.

No IHSSI properties are located within 500 feet of the project area, a distance that would serve as a more-than-adequate area of potential effect (APE) given the limited project scope and the surrounding terrain, which is partially wooded.

Properties with aboveground resources located adjacent to the project area consist of late twentieth-century commercial buildings and late twentieth-century ranch houses (common types). None of properties adjacent to the project are possess the significance, integrity, and/or age necessary to be considered potentially eligible for the National Register.

Based on the available information, as summarized above, no aboveground concerns exist.

Archaeology Report Author/Date: Damian Miller/September 6, 2018; Chuck Mustain et al./March 30, 2020

Summary of Archaeology Investigation Results:

A Phase Ia archaeological records check and field reconnaissance survey of the Phase 3A tail corridor were conducted by ASC Group, Inc. The resulting archaeological short report (Miller 2018) was reviewed and approved by INDOT Cultural Resources personnel who meet the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61. The archaeological records check determined that the proposed Phase 3A trail corridor had not been covered by previous archaeological investigations, and that no archaeological resources had been previously recorded within or adjacent to the corridor. A Phase Ia archaeological field reconnaissance survey found that portions of the trail corridor had been previously disturbed. Undisturbed portions of the trail corridor were examined by systematic shovel probing. No archaeological materials were found to be present, and no additional investigation was recommended.

A Phase Ia archaeological records check and field reconnaissance survey of the Phase 3B tail corridor were conducted by ASC Group, Inc. The resulting archaeological short report (Mustain et al. 2020) was reviewed and approved by INDOT Cultural Resources personnel who meet the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61. The archaeological records check determined that a portion of the proposed Phase 3B trail corridor had been covered by a previous archaeological investigation (King 2006), but that no archaeological resources had been previously recorded within or

adjacent to the corridor. A Phase Ia archaeological field reconnaissance survey found that portions of the trail corridor had been previously disturbed. The trail corridor was examined by systematic shovel probing (N=15) supplemented with bucket augering (N=8) in floodplain alluvium to evaluate the potential for buried cultural deposits. No buried archaeological deposits or buried soil horizons were encountered. The maximum depth of disturbance associated with the trail is expected to be 60 cm, and generally less, and therefore there is no potential to disturb deeply buried deposits had any been present. No archaeological materials were found to be present within the survey area, and no additional investigation was recommended.

Based upon the results of the Phase Ia investigations, there are no archaeological concerns.

Does the project appear to fall under the Minor Projects PA? yes ☒ no ☐

If yes, please specify category and number (applicable conditions are highlighted):

B-8. Construction of pedestrian facilities including trails, multi-use paths, greenways, and associated minor activities defined below, under the following conditions ***[BOTH Condition A, which pertains to Archaeological Resources, and Condition B, which pertains to Above-Ground Resources, must be satisfied]***:

Condition A (Archaeological Resources)
One of the two conditions listed below must be met *(EITHER Condition i or Condition ii must be satisfied)*:

i. Work occurs in previously disturbed soils; *OR*

ii. Work occurs in undisturbed soils and an archaeological investigation conducted by the applicant and reviewed by INDOT Cultural Resources Office determines that no National Register-listed or potentially National Register-eligible archaeological resources are present within the project area. If the archaeological investigation locates National Register-listed or potentially National Register-eligible archaeological resources, then full Section 106 review will be required. Copies of any archaeological reports prepared for the project will be provided to the DHPA and any archaeological site form information will be entered directly into the SHAARD by the applicant. The archaeological reports will also be available for viewing (by Tribes only) on INSCOPE.

Condition B (Above-Ground Resources)
Work does not occur adjacent to or within a National Register-listed or National Register-eligible district or individual above-ground resource.

Activities associated with this category include the following:

- Pavement surface replacement, rehabilitation, resurfacing, and reconstruction work, including widening, laying down of crushed stone or gravel, shoulder treatments, pavement repair, seal coating, pavement grinding, pavement marking, etc.;
- Installation of new signals, signage, and other traffic control devices;
- Installation of new safety appurtenances such as guardrails and barriers;
- Installation of plant materials and hardscape landscaping elements, including, but not limited to bike racks, benches, trash cans, lighting, and other amenities;
- Trail heads and parking lots;
- Installation of pipes, culverts, and pedestrian bridges.

If no, please explain:

Additional comments: If any archaeological artifacts or human remains are uncovered during construction, demolition, or earth moving activities, construction in the immediate area of the find will be stopped, and the INDOT Cultural Resources Section and the Division of Historic Preservation and Archaeology will be notified immediately.

INDOT Cultural Resources staff reviewer(s): Anthony Ross and Matt Coon

****Be sure to attach this form to the National Environmental Policy Act documentation for this project. Also, the NEPA documentation shall reference and include the description of the specific stipulation in the PA that qualifies the project as exempt from further Section 106 review.*