

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

<b>Road No./County:</b>	South County Line Road / Marion and Johnson Counties
<b>Designation Number(s):</b>	Des. No. 2002553 (Lead), Des. No. 2100121 (Bridge over Pleasant Run Creek), and Des. No. 2100122 (Bridge over Buffalo Creek)
<b>Project Description/Termini:</b>	Added Travel Lanes, New Alignment Roadway, and Bridge Replacements/ Along South County Line Road and associated crossings, from approximately 0.21 mile east of State Road (SR) 37 to SR 135

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

**Approval**

N/A



January 31, 2024

INDOT DE Signature and Date  
 Digitally signed by KARSTIN MARIE CARMANY-GEORGE  
 KARSTIN MARIE CARMANY-GEORGE  
 Date: 2024.02.06 16:04:15  
 -05'00'

INDOT ESD Signature and Date

**Release for Public Involvement**

N/A



November 6, 2023

INDOT DE Initials and Date

INDOT ESD Initials and Date

**Certification of Public Involvement**

12/22/2023



INDOT Consultant Services Signature and Date

INDOT DE/ESD Reviewer Signature and Date:



January 31, 2024

**Name and Organization of CE/EA Preparer:**

Susan Harrington, HNTB Corporation

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

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### Part I – Public Involvement

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

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

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

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

#### **Notice of Entry Letters**

Notice of Entry letters were mailed to potentially affected property owners near the project area on July 7, 2020, notifying them about the project and that individuals responsible for land surveying and field activities may be seen in the area. A sample copy of the Notice of Entry letter is included in Appendix G, pages 1-2.

#### **Section 106**

To meet the public involvement requirements of Section 106, a legal notice of the Federal Highway Administration's (FHWA's) finding of "No Adverse Effect" will be published the week of October 16, 2023 and may run concurrently with the notice of public hearing. The notice will offer the public an opportunity to submit comment pursuant to 36 CFR 800.2(d), 800.31, and 800.6(a)(4) and the comment period will be open for 30 days.

#### **Public Involvement Meeting #1 (Appendix G, pages 3-36)**

A virtual public meeting was held on Wednesday, April 14, 2021, at 6:00 pm via a WebEx Event. The meeting was also covered live on Indianapolis Government Channel 16 and on three channels available via cable providers. A postcard inviting the public to participate in the virtual public meeting was distributed via US mail (Appendix G, pages 29-30). The public involvement meeting included a presentation providing background information about the project, purpose and need, alternatives considered, the recommended design, environmental considerations, right-of-way needs, and schedule. Participants were also invited to submit questions and comments through the online chat function or by emailing an HNTB contact.

A total of 52 people participated during the virtual meeting live, and the presentation was also made available for viewing on the City of Indianapolis project website (<https://southcountylineroad.com/>). Questions and comments received were varied and included topics such as access to properties during construction, drainage concerns, and property value impacts. Comments were accepted from April 14 to May 3, 2021. A record of the questions asked during the meeting and received after the meeting is included in Appendix G, pages 31- 36. A Frequently Asked Questions (FAQ) sheet was also available during the meeting and on the City of Indianapolis project website (Appendix G, pages 4-5).

#### **Public Involvement Meeting #2 (Appendix G, pages 37-84)**

An in-person public meeting was held on Tuesday, February 8, 2022, at 6:00 p.m. at Glenns Valley Elementary School. The meeting was advertised by a postcard that was distributed via US mail (Appendix G, pages 72-73), and in *The Southsider Voice* on January 26 and February 2, 2022, and *The Indianapolis Star* on January 21 and 31, 2022. The meeting was also covered live on Indianapolis Government Channel 16 and on three channels available via cable providers.

A total of 146 people signed in at the public meeting. An open house session and a formal presentation were offered, as well as a public Question and Answer session. Comments were also accepted from January 21 until March 8, 2022. Questions and comments received were varied and included topics such as access to properties during construction, drainage concerns, property value impacts, maintenance of traffic, noise, and access to public utilities. A record of the

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questions asked during the meeting and received after the meeting is included in Appendix G, pages 74-79. The project website (<https://southcountylineroad.com/>) includes information on the public meeting, including the presentation, and has included project updates as they have occurred during the project development.

### **Public Hearing (Appendix G, pages 85-205)**

The project met the minimum requirements described in the current *Indiana Department of Transportation (INDOT) Public Involvement Manual*, which requires the project sponsor to offer the public an opportunity to submit comments and/or request a public hearing. A hearing occurred, and a legal notice appeared in a local publication after the release of this document for public involvement.

An in-person public hearing was held on Thursday, November 30, 2023, at 6:00 p.m. at Glenns Valley Elementary School. The hearing was advertised by a postcard that was distributed via US mail (Appendix G, pages 96-97), and in the *Daily Journal* and *The Indianapolis Star* on November 15 and November 22, 2023 (Appendix G, pages 86-92). The hearing notice was also distributed via e-mail on November 16, 2023, to entities on the Early Coordination Letter mailing list and the list of residents who signed up for inclusion on the project email list at previous public meetings or through the project website (Appendix G, pages 93-95). The hearing was also covered live on Indianapolis Government Channel 16 and on three channels available via cable providers.

A total of 71 people signed in at the hearing (Appendix G, pages 160-168). An open house session and a formal presentation were offered, as well as a public comment session. Comments were accepted from November 15 until December 15, 2023. Questions and comments received were varied and included topics such as concerns about the multi-use path and sidewalk, loss of trees, access to properties during construction, drainage concerns, property value impacts, maintenance of traffic, noise and vibration, and access to public utilities. A record of the comments received at the meeting, as well as those received before and after the meeting, is included in Appendix G, along with the written responses to all comments (Appendix G, pages 195-205). A total of 28 residents provided comments, including 15 residents who provided verbal comments during the hearing and 13 residents who provided written comments in person or via mail, email, or project website during the comment period. The project website (<https://southcountylineroad.com/>) includes information on the public hearing, including the presentation.

The formal public involvement activities required for the NEPA process have been completed. However, the City of Indianapolis will continue to share information about the project on the project website, via the project email list, and US Postal Service as needed.

### **Public Controversy on Environmental Grounds**

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

Although some negative public comments have been received concerning temporary impacts during construction, increased noise and vibration, property acquisition, property value impacts, loss of trees, and concerns about the multi-use path, positive comments regarding removal of the steep hill west of Morgantown Road, access to municipal sewer and water, pedestrian access, and drainage improvements have also been received. At both the in-person Public Involvement Meeting #2 and the Public Hearing, participants with questions and concerns were able to speak with project team members one-on-one. This was an opportunity for those with negative reactions to the project to receive additional information about the project. Written responses to all comments received, both positive and negative, are located in Appendix G, pages 195-205. At this time, there is no substantial public controversy concerning impacts to the community or to natural resources.

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

Sponsor of the Project: City of Indianapolis INDOT District: Greenfield

South County Line Road, Morris Road, Mount Pleasant East Street, Morgantown Road, Rocky Ridge Road, Ridge Hill Drive, Shady Brook Heights, Glendale Trail Court, Chessie Drive, Depot Drive, Rock Island Court, Railroad Road, Peterman Road/County Road (CR) 400 West, and Mount Pleasant South Street

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

\*If other is selected, please identify the funding source: \_\_\_\_\_

**PURPOSE AND NEED:**

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

**Need:**

**Capacity Deficiencies**

**Table 1: Annual Average Daily Traffic (AADT) Volume Forecasts (vehicles/day)**

Scenario	South County Line Road		
	SR 37 to Morgantown Road	Morgantown Road to Railroad Road	Railroad Road to SR 135
2025 No Build Forecast	<b>17,000</b>	11,400	<b>12,800</b>
2045 No Build Forecast	<b>16,300</b>	<b>13,100</b>	<b>14,100</b>

Notes: **Bold** = AADT Volume Forecasts above LOS D volume threshold.

Level of Service (LOS) is a common way of describing the degree of traffic congestion on roadways, using “grades” on a letter scale from LOS A (best) to LOS F (worst). LOS A represents near ideal traffic flow, while LOS F represents a breakdown of the traffic flow. LOS relates to operations, not the physical condition of the roadway. The Indiana Design Manual<sup>1</sup> recommends that a two-lane arterial road in an urban area, such as South County Line Road, operate with LOS D or better.

The LOS for County Line Road is currently LOS B (both AM and PM Peak Hour) for the Morgantown Road intersection and LOS E (AM Peak Hour) and LOS F (PM Peak Hour) for the Railroad Road intersection (Appendix I, pages 68-80).

The design year capacity requirements for South County Line Road were analyzed using generalized service volume estimates developed by the Florida Department of Transportation (Appendix I, pages 81-82). A Traffic Forecast and Analysis Memo, dated January 15, 2021, can be found in Appendix I, pages 68-80. The 2045 annual average daily traffic volume forecasts for South County Line Road were compared to the theoretical service volume thresholds for a two-lane signalized arterial. The maximum traffic volume that can be served while providing LOS D on South County Line Road in its existing two-lane configuration is estimated to be 12,750 vehicles per day.

<sup>1</sup>Indiana Design Manual, Figure 55-3F. Available at: <https://www.in.gov/dot/div/contracts/design/IDM.htm>

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As shown in Table 1, the estimated 2045 No Build traffic volume projections for each section of South County Line Road between SR 37 and SR 135 will exceed the LOS D volume threshold of 12,750 vehicles per day. In addition, two sections will exceed the LOS D volume threshold in 2025 partially due to the opening of the I-69 interchange with South County Line Road which was opened in 2023 (Appendix I, page 70) as part of the project upgrading SR 37 to I-69 from Martinsville to Indianapolis.

### Lack of East-West Mobility

Mobility is the easy movement of people and goods through an area. Traffic congestion within a corridor reduces mobility for vehicular users. Critical locations where traffic congestion occurs are referred to as "bottlenecks." As identified in their publication "Traffic Bottlenecks: A Primer – Focus on Low-Cost Solutions" (<https://ops.fhwa.dot.gov/publications/fhwahop18013/chap2.htm>), FHWA has identified nine conditions that generally create bottlenecks. Several of these geometric deficiencies are or will be found along South County Line Road between SR 37 and SR 135, including:

- Lane drops, which are located immediately west of SR 135, as well as those created at the newly constructed I-69 interchange with South County Line Road;
- Changes in highway alignment, including the steep vertical curve and corresponding limited sight distance that currently exists on the west approach to Morgantown Road; and
- Narrow lanes/lack of shoulders, which occur throughout much of the corridor.

The existing condition of South County Line Road east of the project area extending to I-65 is a five-lane cross section. The two-lane section of the roadway is already a bottleneck and the projected traffic volumes for the roadway will likely increase the delays caused by the bottleneck.

The Indianapolis Metropolitan Planning Organization (MPO) *2045 Long Range Transportation Plan* (<https://www.indympo.org/planning/mtp>) indicates that South County Line Road between SR 37 and SR 135 will be congested in 2045. As shown in Figure 1 below, several east-west arterial roadways that connect SR 37 and SR 135 located between South County Line Road and I-465 are anticipated to experience similar congested conditions in 2045. These facilities include:

- Stop 11/Meridian School Road (two-lane from SR 37 to Rahke Road; Four-lane from Rahke Road to SR 135)
- Southport Road (five-lane from SR 37 to Bluff Road; two-lane from Bluff Road to SR 135)
- Edgewood Avenue (two-lane from SR 37 to SR 135).

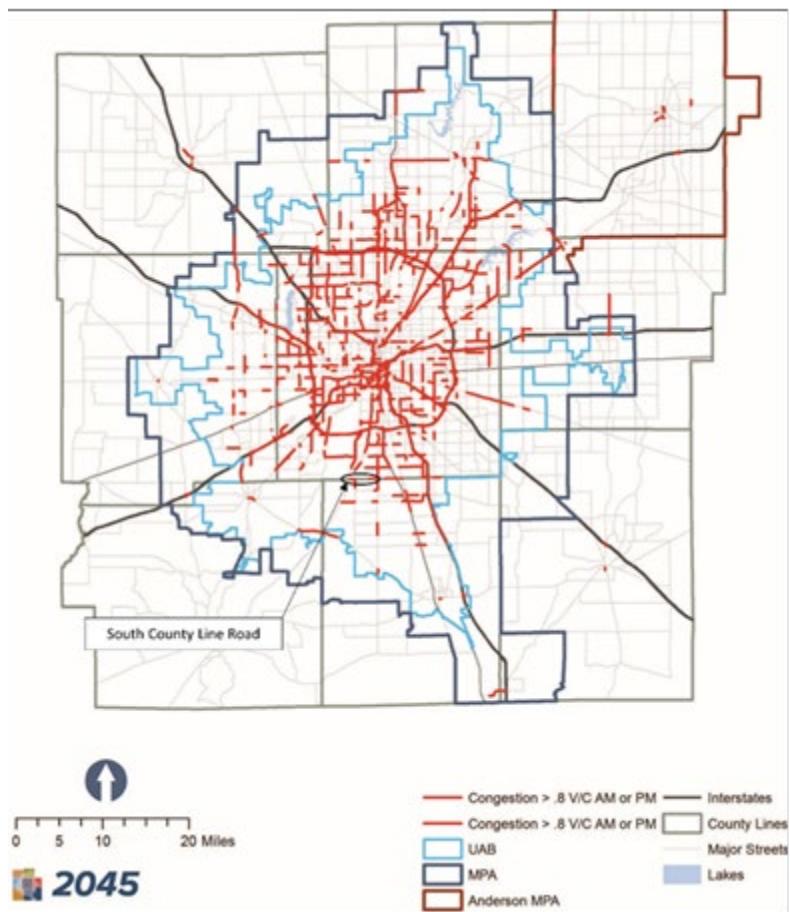
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**Figure 1: Congested Facilities (Indianapolis Travel Demand Model)**



Collectively, the capacity constraints of these east-west arterial roadways limit east-west vehicular mobility in southern Marion County.

There are very few areas along County Line Road within the project limits that have any existing sidewalks, and none are longer than 200 feet. Because they are isolated and not connected to any other sidewalks, there is no pedestrian or bicycle mobility along the corridor. This limits the safe and efficient movement of non-motorized traffic in the corridor. Sidewalks exist on one or both sides of South County Line Road from west of SR 135 to I-65.

## Geometric Deficiencies

Geometric design of roads considers the positioning of the physical elements of the roadway according to standards to optimize efficiency and safety. Geometric design involves the alignment, profile, and cross section of the roadway. Geometric deficiencies of the current conditions within this portion of the County Line Road corridor include:

- Substandard sharp vertical curve and limited sight distance at the west approach to Morgantown Road
- Narrow lanes/lack of shoulders
- Lack of turn lanes

These deficiencies have a negative impact on safety and efficient movement of traffic through the corridor.

## Safety

In the three-year period spanning from 2017 to 2019, a total of 151 crashes occurred along South County Line Road from east of SR 37 to west of SR 135. Of the 151 crashes, approximately 49% were rear end crashes. In general, rear-

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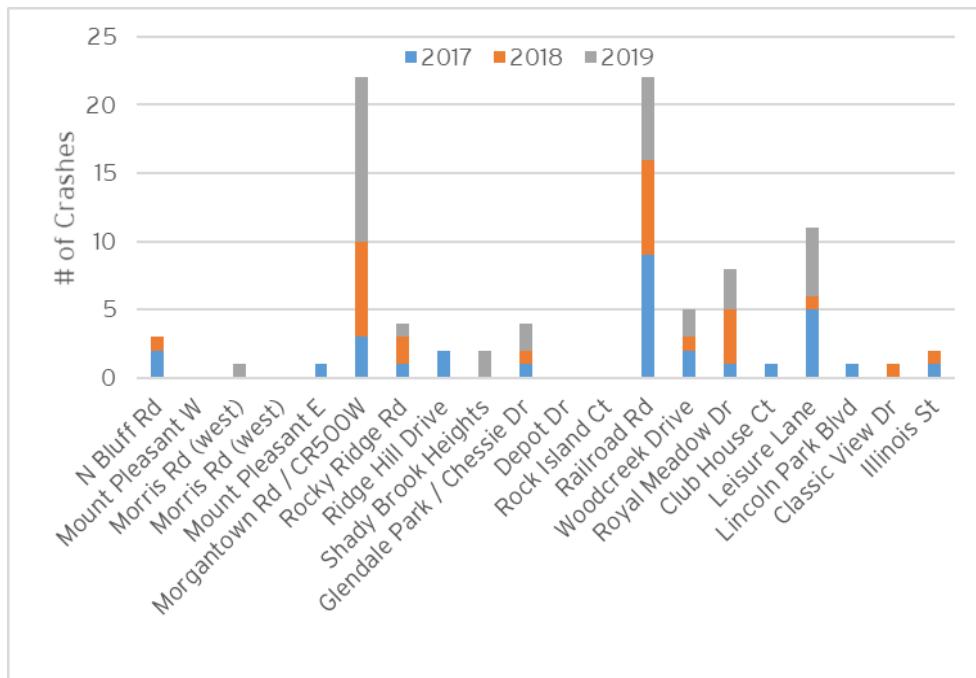
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end crashes are indicative of elevated levels of congestion, lack of turn lanes, and/or closely spaced intersections.

The number of crashes per intersection was examined to identify any specific areas of concern. As illustrated in Figure 2, the Morgantown Road and Railroad Road intersections are where a large majority of crashes occurred. Crashes nearly doubled from 2018-2019 at the Morgantown Road intersection, while crashes at the Railroad Road intersection remained relatively constant in this time period. Crash data can be found in Appendix I, pages 72-75.

**Figure 2: Total Crashes per Intersection**



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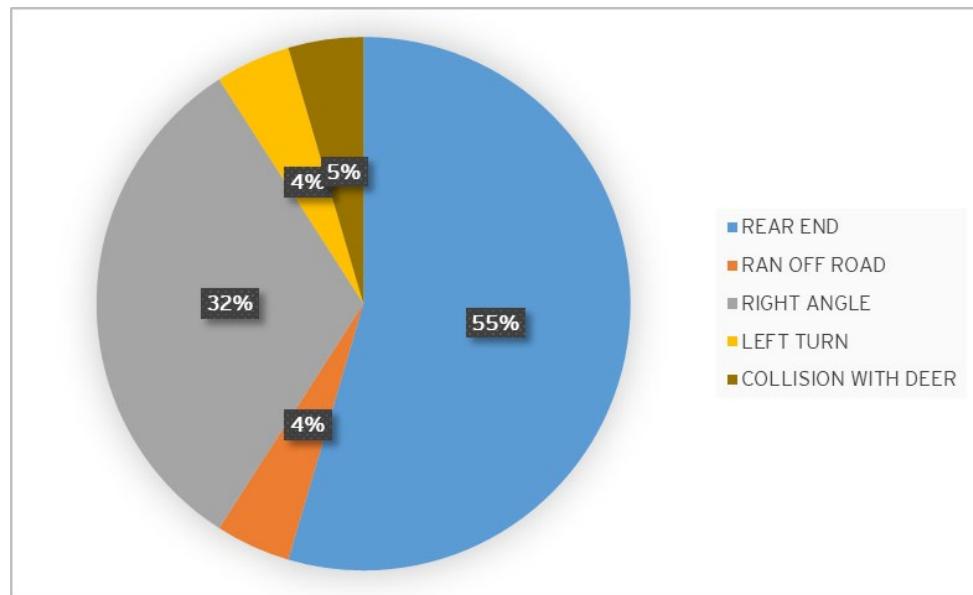
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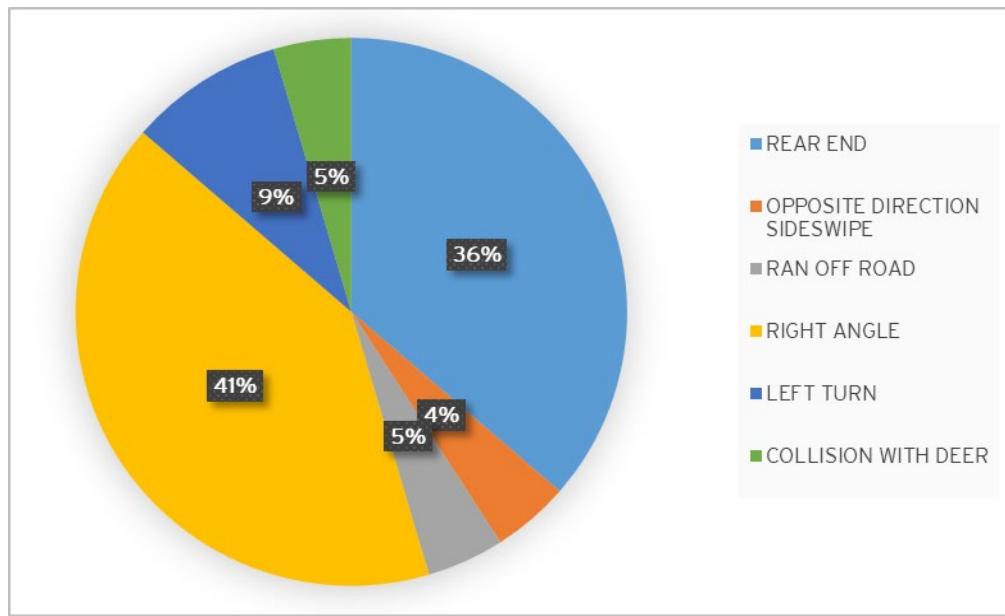
As depicted in Figure 3, the two main crash types at the Morgantown Road/South County Line Road intersection are rear-end crashes and right-angle crashes. These two types of crashes are typically associated with congested conditions and improper traffic signal clearance intervals, respectively.

**Figure 3: Crash Types at Morgantown Road & South County Line Road Intersection**



Right-angle crashes are the principal crash type at the Railroad Road/South County Line Road intersection, as illustrated in Figure 4. This is currently an all-way stop controlled intersection. The second highest crash type at the intersection are rear-end crashes, which are indicative of congested conditions.

**Figure 4: Crash Types at Railroad Road & South County Line Road Intersection**



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## Purpose:

The purpose of the South County Line Road project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor. Alternatives considered as part of the South County Line Road project must:

- Address capacity deficiencies
  - Reduce traffic congestion and improve arterial level of service to LOS D or better in the design year of 2045
- Improve east-west mobility
  - Provide appropriate pedestrian and bicycle facilities
  - Provide adequate vehicular mobility and address potential for bottlenecks
- Address geometric deficiencies
  - Correct the substandard sharp vertical curve improve sight distance at the intersection of South County Line Road/Morgantown Road
  - Address the narrow lanes and lack of shoulders
  - Address the lack of turn lanes
- Improve safety
  - Reduce the number of rear end crashes on the facility

## PROJECT DESCRIPTION (PREFERRED ALTERNATIVE):

County: Marion and Johnson

Municipality: Indianapolis and Greenwood

Limits of Proposed Work: **South County Line Road**: 0.21 mile east of SR 37 to SR 135  
**Morris Road** (eastern South County Line Road junction): South County Line Road to 0.05 mile north of South County Line Road  
**Mount Pleasant East Street**: South County Line Road to 0.05 mile south of South County Line Road  
**Morgantown Road**: 0.08 mile south of South County Line Road to 0.05 mile north of South County Line Road  
**Rocky Ridge Road**: South County Line Road to 0.03 mile north of South County Line Road  
**Ridge Hill Drive**: South County Line Road to 0.02 mile north of South County Line Road  
**Shady Brook Heights**: South County Line Road to 0.02 mile south of South County Line Road  
**Glendale Trail Court**: South County Line Road to 0.02 mile south of South County Line Road  
**Chessie Drive**: 0.03 mile south of South County Line Road to 0.05 mile north of South County Line Road  
**Depot Drive**: South County Line Road to 0.02 mile north of South County Line Road  
**Rock Island Court**: South County Line Road to 0.02 mile north of South County Line Road  
**Railroad Road**: South County Line Road to 0.12 mile north of South County Line Road  
**Peterman Road/CR 400 West**: South County Line Road to 0.21 mile south of South County Line Road  
**Mount Pleasant South Street**: Mount Pleasant West Street to North Bluff Road (new alignment)

Total Work Length: 2.32 Mile(s)

Total Work Area: 77.849 Acre(s)

<input type="checkbox"/>	<input checked="" type="checkbox"/>
Date: <u>N/A</u>	

Is an Interstate Access Document (IAD)<sup>1</sup> required?

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

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

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

The City of Indianapolis and FHWA intend to proceed with an added travel lanes project along South County Line Road. The project will be constructed in two contracts. Part 1 will be constructed from the western termini to east of Rock Island Court. The remainder of the project will be constructed in Part 2 (Appendix B, page 66).

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### Location:

This project is located on South County Line Road, on the dividing line between Marion and Johnson Counties, beginning 0.21 mile east of SR 37 and extending east to SR 135 (locally known as Meridian Street). The project also extends north and south along several cross streets for the purposes of drainage improvements, grade changes, cul-de-sac construction, and access improvements. The project extends from South County Line Road approximately:

- 0.05 mile north along Morris Road (eastern junction with South County Line Road)
- 0.05 mile south along Mount Pleasant East Street
- 0.08 mile south and 0.05 mile north along Morgantown Road
- 0.03 mile north along Rocky Ridge Road
- 0.02 mile north along Ridge Hill Drive
- 0.02 mile south along Shady Brook Heights
- 0.02 mile south along Glendale Trail Court
- 0.03 mile south and 0.05 mile north along Chessie Drive
- 0.02 mile north along Depot Drive
- 0.02 mile north along Rock Island Court
- 0.12 mile north along Railroad Road
- 0.21 mile south along Peterman Road/CR 400 West

In addition, a 0.1-mile extension of new alignment to Mount Pleasant South Street will be constructed to provide access to the Mount Pleasant community to Bluff Road in the southwestern corner of the Mount Pleasant neighborhood.

The project is located in Sections 21, 22, 23, 26, 27, and 28 of Township 14 North, Range 3 East in White River Township in Johnson County and Perry Township in Marion County (Appendix B, pages 1-6).

### Existing Conditions:

South County Line Road is classified as a two-lane (one lane in each direction) principal arterial roadway through the majority of the project corridor. There are variable turn and auxiliary lanes along this segment of South County Line Road, which are primarily at the entrance of businesses or residential neighborhoods, and the auxiliary lanes are primarily intended as passing lanes to turning traffic. County Line Road has been improved to include curb and gutter, pedestrian facilities, and four lanes between the I-69 interchange and Morris Road as part of the 2023 construction of that interchange. Additionally, east of Classic View Drive, County Line Road has been improved to include curb and gutter, pedestrian facilities, four through lanes, and variable turn lanes at the southern drive to the Greenwood Meadows facility, South Illinois Street, and SR 135. The majority of the project area does not have pedestrian facilities, curb and gutter, or shoulders. Additionally, there is curb and gutter, as well as variable pedestrian facilities, adjacent to South County Line Road along several of the residential neighborhood cross streets, which extend north and south into the associated neighborhoods. Shoulders are present along South County Line Road from approximately Royal Meadow Drive to SR 135. There is existing guardrail along the South County Line Road bridges over Pleasant Run Creek and Buffalo Creek and their associated approaches, as well as along a residential property on the north side of South County Line Road just west of the west Winterbrook mobile home community entrance.

As discussed above, South County Line Road is a highly traveled roadway with frequent backups in each direction (Appendix I, pages 68-80). Traffic operations analysis was conducted for South County Line Road to determine the recommended roadway lane configuration and intersection traffic control to be constructed. Current LOS ranges from A to B at the existing signalized intersection of Morgantown Road and C to F at the existing stop-controlled intersection of South County Line Road and Railroad Road. LOS for the main line of South County Line Road was not calculated; however, the maximum volume that can be served with an acceptable highway capacity LOS D or better on South County Line Road in its existing two-lane configuration is estimated to be 12,750 vehicles per day. Current and future no build traffic volumes exceed that number, and therefore South County Line Road would have a LOS of E or worse (Appendix I, pages 68-80).

Land use in the vicinity of the project is primarily residential with some commercial entities throughout the project area and one area of agricultural land. The current posted speed on South County Line Road is 30 miles per hour (mph) from SR 37 to Morgantown Road and 40 mph from Morgantown Road to SR 135.

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There are two major intersections along South County Line Road within the project limits: Morgantown Road and Railroad Road/Peterman Road. The Morgantown Road intersection is controlled by a traffic signal and has left-turn lanes in all directions. There is a steep hill on South County Line Road just west of this intersection, with an existing roadway grade of approximately nine percent. The existing vertical geometry does not meet INDOT design standards for vertical grade for the existing posted speed of 30 mph.

The Railroad Road/Peterman Road intersection is controlled by a four-way stop, with a single approach lane from all four directions. At this intersection, Railroad Road extends to the north and Peterman Road extends to the south. The Indiana Rail Road has a single-track rail line immediately adjacent to Railroad Road/Peterman Road, with an at-grade crossing of South County Line Road less than 50 feet west of the intersection. The crossing has overhead flashers but no gates.

Existing drainage in the area is collected by curb and gutter, along with shallow ditches on both sides of South County Line Road. There are also ditches that run on both sides of the railroad track near the intersection with Railroad Road and Peterman Road. There are cross culverts near Pleasant Run Creek and at Buffalo Creek, and at the railroad intersection area. Hydraulic studies in the area of Pleasant Run Creek bridge (Appendix I, pages 137-143) have shown some negative freeboard, which means that there is a potential for flooding in heavy rain events. Freeboard is the vertical distance between the water level and the bottom edge of the bridge.

The existing structure carrying South County Line Road over Pleasant Run Creek (Structure No. 49-4503F) is a concrete box beam, continuous three-span bridge with spans of 41'-3", 49'-6", and 41'-3". It is located approximately 650 feet east of the Morgantown Road Intersection. The existing superstructure is supported by end bents with spill slopes on piles and hammerhead piers on spread footings. The existing bridge was built in 1973, and no rehabilitations are on record. The out-to-out bridge deck length is 134'-10.5". The out-to-out coping width is 31'-6" with a clear roadway width of 28'-0". The existing bridge does not provide an adequate hydraulic opening (Appendix I, page 27). According to the latest INDOT bridge inspection report for Structure No. 49-4503F, dated December 28, 2022, the existing deck and superstructure are in satisfactory condition, the wearing surface is in fair condition, and the existing substructure is in good condition. See Appendix I, pages 33-44 for the most recent bridge inspection report.

The existing structure carrying South County Line Road over Buffalo Creek (Structure No. 49-4510F), is located just west of Leisure Lane on South County Line Road. Built in 1987, it is a reinforced concrete slab, continuous three-span bridge with spans of 24'-10", 29'-10", and 24'-10". The existing superstructure is supported by end bents with spill slopes and wall piers on two rows of piles. The out-to-out bridge deck length is 81'-4". The out-to-out coping width is 47'-0" with a clear roadway width of 44'-0". The existing bridge uses 1'-6" concrete railing. The existing bridge does not provide an adequate hydraulic opening (Appendix I, page 49). According to the latest INDOT bridge inspection report for Structure No. 49-4510F, dated December 21, 2022, the existing wearing surface and substructure are in good condition. The substructure is in good condition, with minor concerns noted with the underpin in the northwest corner. The existing superstructure and bridge deck are in satisfactory condition, with minor deterioration especially at the drains, and cracking in the coping and underside of the slab. See Appendix I, pages 55-67 for the most recent Bridge Inspection Report.

### Other Nearby Projects:

Other planned or recently completed projects in the area were taken into consideration while planning and designing this project:

Des No. 1700158 - Intersection Improvement with Added Travel Lanes on SR 135 at County Line Road

Des No. 1801695 - I-69 Interchange at County Line Road

Private Development – Construction of a retirement residence on the south side of County Line Road near the eastern terminus of the project

### Preferred Alternative:

The lead Des. No. for this project is 2002553 and covers the South County Line Road reconstruction. The Des. No. for the South County Line Road over Pleasant Creek bridge replacement is 2100121 and the Des. No. for the South

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County Line Road over Buffalo Creek bridge replacement is 2100122. The project will be constructed in two contracts. Part 1 will construct from the western termini to east of Rock Island Court. The remainder of the project will be constructed in Part 2 (Appendix B, page 66).

The proposed project will expand South County Line Road to a five-lane road with a multi-use trail on the north side and a sidewalk on the south side of the roadway. The intersections at Morgantown Road and Railroad Road will be expanded and upgraded. The project will also replace the bridges over Pleasant Run Creek and Buffalo Creek, construct culs-de-sac at Morris Road and Mount Pleasant East Street, address the substandard sharp vertical curve at Morgantown Road, and construct a new local road between Mount Pleasant South Street and North Bluff Road. New permanent lighting will be installed throughout the project area. Drainage improvements will be made by constructing stormwater detention ponds, installing curb and gutter, inlets, and an enclosed storm drainage system, in addition to replacing/upgrading culverts and pipes within the project area. Project plans can be found in Appendix B, pages 67-162.

### Added Through Travel Lanes on South County Line Road

The proposed project will expand South County Line Road to a five-lane road (two 11-foot lanes in each direction and a 13-foot two-way center left-turn lane). Due to the number of driveway and street intersections along South County Line Road, a two-way center left-turn lane is included in the preferred alternative to improve ease and safety for left turns.

### Upgraded Intersections at Morgantown Road and Railroad Road

Right-turn lanes will be added at the Morgantown Road and Railroad Road intersections. The existing traffic signal at the Morgantown Road intersection will be upgraded by adding additional signal heads to accommodate the wider roadway and pedestrian signals. At Railroad Road, the intersection will be upgraded from a four-way stop to a signalized intersection, and upgrades will be made to the at-grade railroad crossing protection, including adding stop arms and adding signal interconnectivity between vehicle traffic and railroad activity. This connectivity will ensure that intersection traffic signals turn red when a train is approaching. Pavement will be reconstructed at the crossing location.

### Multi-use Trail and Sidewalk

A 10-foot-wide asphalt multi-use trail will be constructed on the north side of South County Line Road and a six-foot-wide sidewalk will be constructed on the south side of South County Line Road. There will be a six-foot-wide grass buffer on either side of the roadway. Pedestrian crosswalks, curb ramps, and signals will be provided at each signalized intersection.

### Vertical Curve Correction at Morgantown Road and Neighborhood Access

To address the sharp vertical curve at Morgantown Road, retaining walls will be used to allow the flattening of the roadway to acceptable design parameters while maintaining the same design speed and reducing the quantity of parcel acquisition that would have been required if retaining walls were not utilized. For properties where the retaining wall is proposed, driveways will be reconstructed in order to maintain access and tie in to the new grade, and proper safety measures such as fencing will be added at the top of the retaining wall.

Because of the proximity to the hill approaching Morgantown Road, construction of the project will require changes in access at the intersection of South County Line Road and Mount Pleasant East Street and the eastern intersection with Morris Road and South County Line Road. The proposed project will change these two intersections to culs-de-sac that will no longer connect with South County Line Road. These changes are necessary due to the lowering of the roadway in order to meet vertical sight distance standards and improve safety. A new entrance to the Mount Pleasant neighborhood will be constructed in the southwest corner of the neighborhood connecting Mount Pleasant South Street to North Bluff Road to provide an appropriate number of egress points to the neighborhood based on its size.

The portion of the project east of Morgantown Road will generally match the existing vertical profile.

### Driveway Reconstruction

Throughout the project corridor, driveways will be reconstructed to tie in the newly constructed lanes and curbs. In situations where current driveways are at a skew, they will be reconstructed to correct sight lines whenever possible.

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### Drainage Improvements

South County Line Road east of Morgantown Road will be raised to provide one foot of freeboard in the area of the bridge at Pleasant Run Creek to address flooding in this area. A curb and gutter system and both an open and enclosed storm sewer system will be used for the proposed project. Basins will be used in conjunction with the storm sewer system to detain stormwater. Additionally, three stormwater management ponds will be constructed as part of the project:

- A detain and release pond will be constructed in the large agricultural field on the south side of South County Line Road between Morgantown Road and CR 400 West. The pond will outlet at a controlled rate to Pleasant Run Creek.
- An infiltration pond will be constructed near the Mount Pleasant South Street extension.
- A detain and release pond will be constructed east of Lincoln Park Boulevard south of South County Line Road. The pond will drain beneath South County Line Road to the northwest and outlet into Buffalo Creek.

### Bridge and Culvert Work

Approximately 55 existing culverts and pipes are located within the project area. Of that total, approximately five structures will be left in place. The remaining structures will be removed and replaced with the proposed enclosed storm sewer system. Approximately 22 new structures are proposed. The majority of the new structures will be storm sewer outfall pipes. Details of the location, size, and material for each structure can be found in Appendix I, pages 3-5.

Two existing bridges will be replaced to accommodate the additional travel lanes and address deficiencies in hydraulics (Appendix B, pages 153-162).

- South County Line Road over Pleasant Run Creek (Des. No. 2100121): The existing bridge will be replaced with a continuous composite steel beam bridge with three spans measuring 40 feet, 60 feet, and 40 feet. Riprap will be placed at the bents for scour protection. Channel clearing will remove sediment to create a larger hydraulic opening for the bridge. Existing guardrail will be removed and new Midwest Guardrail System (MGS) guardrail will be constructed.
- South County Line Road over Buffalo Creek (Des. No. 2100122): The existing bridge will be replaced with a continuous reinforced concrete slab bridge with three spans measuring 34 feet, 41 feet, and 34 feet. Riprap will be placed at the bents for scour protection. Channel clearing will remove sediment to create a larger hydraulic opening for the bridge. A Mechanically Stabilized Earth (MSE) wall will be constructed at Bent No. 4, and existing guardrails will be removed and replaced with new MGS guardrail.

### **Maintenance of Traffic (MOT):**

Traffic will be maintained in six phases, with Phases 1-3 occurring during Part 1 of construction and Phases 4-6 occurring during Part 2 of construction (Appendix B, pages 66 and 87-119). Access to all properties is anticipated to be maintained at all times. More information is included in the MOT section of this document.

### **Project Impacts:**

The project will require 22.815 acres of permanent right-of-way, 30.638 acres of temporary right-of-way, and nine relocations. The project also will have approximately 581 linear feet of permanent impacts to waterways, 0.05 acre of impacts to wetlands, and 60.365 acres of terrestrial habitat disturbance, including 13.5 acres tree clearing. The preferred alternative was selected after considering the impacts to the community and the natural environment compared to other alternatives. Throughout the design process, efforts have been made to minimize those impacts. The project has been designed to reduce the number of residential relocations. The design team looked at different horizontal and vertical alignments for the five-lane alternative to minimize impacts to surrounding homes. It was determined that widening the roadway equally on both sides was the best option in order to minimize impacts to properties and reduce relocations. Retaining walls are being used to limit right-of-way needs of the project by reducing the amount of space needed for grading. The elevation of the proposed roadway was raised or lowered slightly as necessary to minimize construction limits. In addition, the 10-foot, multi-use trail is being built on only one side of the road in order to limit right-of-way needs.

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### Addressing Purpose and Need:

By constructing added travel lanes, correcting the vertical sight distance at Morgantown Road, and constructing a multi-use trail and sidewalk, the proposed project meets the purpose and need to address capacity deficiencies, improve east-west mobility, address geometric deficiencies, and improve safety. More information is provided below about how each element of the purpose and need is met by the preferred alternative.

- Address capacity deficiencies
  - Under the build condition (2045), the LOS ranges from B to D for the intersection of Morgantown Road and C to D at the intersection of County Line Road and Railroad Road. LOS for the main line of County Line Road was not calculated; however, the maximum volume that can be served with an acceptable highway capacity of LOS D or better on County Line Road in its existing two-lane configuration is estimated to be 12,750 vehicles per day. With the proposed five-lane configuration, the build alternative is expected to have a LOS of D or greater (Appendix I, pages 70-78). Therefore, the preferred alternative addresses the goal to reduce traffic congestion and improve arterial level of service to LOS D or better in the design year of 2045.
- Improve east-west mobility
  - By providing a continuous multi-use path on the north side of County Line Road and a sidewalk on the south side of County Line Road, the preferred alternative addresses the goal to improve east-west mobility for pedestrians and cyclists.
  - By providing added through and turning lanes, the preferred alternative reduces the potential for bottlenecks and provides adequate east-west vehicular mobility to facilitate efficient travel within the region, and therefore addresses the goal to improve east-west mobility for vehicles.
- Address geometric deficiencies
  - By correcting the substandard sharp vertical curve and improving sight distance at the intersection of South County Line Road/Morgantown Road, widening the travel lanes, adding shoulders, and adding turn lanes, the preferred alternative meets the goal of addressing geometric deficiencies.
- Improve safety
  - By adding through travel and turn lanes the preferred alternative is expected to reduce the number of rear end crashes on the facility, and therefore addresses the goal of improved safety.

### Logical Termini/Independent Utility:

The project has independent utility because it will provide a fully functional roadway without any additional transportation improvements beyond the project limits. This project is independent from the other projects mentioned above (Des No. 1700158, Des No. 1801695, and private development of a retirement residential facility). The project termini are logical. The western terminus picks up where the newly constructed I-69 project interchange ends. At the eastern terminus, beginning near the western edge of the intersection at SR 135, the roadway is already a five-lane cross section. The project termini are appropriate as they include all areas that contribute to the transportation problem and encompass a range of solutions appropriate to solving the transportation problem.

### OTHER ALTERNATIVES CONSIDERED:

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

According to the *South County Line Road Scoping Report*, dated November 20, 2019 (Appendix I, pages 118-136), and the *Geometric Alternative Analysis Memo* completed by HNTB on November 30, 2020 (Appendix I, pages 6-22), various alternatives were considered for different design components of the project, including proposed number of lanes for South County Line Road, horizontal alignment of the widening of South County Line Road, vertical profile of South County Line Road west of Morgantown Road, vertical profile in the area of Pleasant Run Creek, and vertical profile east of Morgantown Road. In addition, multiple options were considered for the two bridges within the project area.

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### **Proposed Number of Lanes (Appendix I, page 76)**

Three-Lane Expansion: This alternative would add a two-way left-turn lane to the center of South County Line Road, bringing the total number of lanes to three. This alternative would help with turning movements, but based on the volume of traffic, it would not meet capacity needs and would not be consistent with the existing alignment of South County Line Road east of the project limits. This alternative would not meet the project needs for added capacity and was therefore withdrawn from further consideration.

### **Horizontal Alignment of the Widening of South County Line Road (Appendix I, pages 8-10)**

Alternatives for different horizontal configurations for South County Line Road between the Morgantown Road intersection and the eastern extent of the project at SR 135 were analyzed. The intersection of Morgantown Road and to the west was not being analyzed for various horizontal options due to the density of housing, the close proximity of the proposed interchange with I-69 to the west of this project limit, the newly constructed bridge along Morgantown Road north of South County Line Road, and the anticipated amount of cut required into the hill to the west of the Morgantown Road intersection. Therefore, the horizontal alignment of South County Line Road will approximately match the existing configuration in the western portion of the project.

New Centerline at North Edge of Pavement: For this option, the centerline would be adjusted to the current northern edge of pavement. This shift, approximately 11 feet to the north, would place horizontal curves at two locations in the corridor between Morgantown Road and SR 135 that would place the centerline of the new South County Line Road along this existing pavement edge. A benefit to this option is minimizing the amount of temporary pavement required for MOT during construction. Shifting the centerline of South County Line Road 11 feet to the north would mean that the new westbound edge of pavement would be approximately 17 to 18 feet further to the north. This combined with the multi-use trail proposed on the north side of South County Line Road would have impacts on properties along the north side of South County Line Road, including relocations of approximately 26 additional houses on the north side of South County Line Road. Applying this option to the corridor selectively would minimize the quantity of parcel acquisitions throughout, but would introduce multiple horizontal curves into the corridor, changing the makeup of the east-west movements of traffic from the existing straight-line configuration. Although this alternative would meet the project purpose and need, it was discarded from further consideration due to property acquisition impacts.

New Centerline at South Edge of Pavement: This option would move the centerline of South County Line Road in order to reduce temporary pavement required for MOT and to utilize existing travel lanes for the first phase of construction. The new centerline of South County Line Road would align with the approximate edge of pavement in the eastbound direction. Because land along the south side of South County Line Road is tentatively planned to be used for surface detention to meet hydraulic requirements, this southern shift of the horizontal alignment would require additional right-of-way purchasing on the south side of the corridor. Approximately 13 relocations would be required. Similar to shifting the centerline to the north edge of pavement, this option could also be applied on a selective approach to minimize the quantity of parcel acquisitions but would similarly introduce multiple horizontal curves into the corridor, which would change the makeup of east-west movements of traffic from the existing straight-line configuration. Although this alternative would meet the project purpose and need, it was discarded from further consideration due to property acquisition impacts.

### **Vertical Profile of South County Line Road West of Morgantown Road (Appendix I, pages 6-8)**

Retaining Walls with Vertical Curve Maximum Reduction: This option would flatten the vertical curve down to acceptable design parameters while maintaining the same design speed and utilizing retaining walls to reduce the quantity of parcel acquisition required. The intersection of South County Line Road with Morgantown Road acts as a profile tie-in point due to an existing bridge over Pleasant Run located 200 feet north along Morgantown Road. This bridge structure was reconstructed in 2019 as part of an unrelated project. Raising the intersection in question would require reconfiguration of this bridge. In lowering the grade of this hill, the intersections of Morris Road and Mount Pleasant East Street will be altered. Because the cut of the hill also extends into these two roads, access to them would no longer be feasible and culs-de-sac would be constructed on these two roadways in order to provide safe termini.

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Providing culs-de-sac at the backside of retaining walls would also reduce property acquisitions. For properties in wall areas that would not need to be removed, driveways would be reconfigured in order to maintain access, and proper safety measures such as fencing would be added at the top of the retaining wall. After construction, access to South County Line Road would be closed to the eastern intersection of Morris Road. All access to properties in this area would come from the western intersection of Morris Road, which is approximately 0.20 mile east of SR 37 and 0.27 mile west of Morgantown Road. Access to South County Line Road would also be removed at Mount Pleasant East Street, 0.07 mile west of Morgantown Road. Access to this neighborhood would be from Mount Pleasant Center Street on Morgantown Road and Mount Pleasant West Street near SR 37. This option would require ten relocations. Although this alternative would meet the project purpose and need, it was discarded from further consideration due to increased cost of retaining wall construction, the number of relocations, reduced access, and the necessity of reconfiguring the existing bridge.

Open Side Slopes with Vertical Curve Reduction: This option would have the same profile design as the Retaining Walls with Vertical Curve Maximum Reduction alternative above, but with open cutting of earthwork in place of utilizing retaining walls. This option would require optimization of the vertical profile to account for the cut required in the hill to the west of the Morgantown Road intersection, where the crest of the hill is 40 feet above the intersection. Because the intersection grade cannot be raised or lowered without affecting the Morgantown Road bridge reconstructed in 2019, vertical profile adjustments must be made based on this intersection's current configuration. This option would require more relocations due to the open side slope earthwork condition, including removal of houses. This option would rebuild the Morris Road and Mount Pleasant East Street intersections at grade in lieu of installing culs-de-sac. Maintaining all access points into the neighborhood is considered an advantage for this option. This alternative anticipates 22 relocations along South County Line Road, Morris Road, and Mount Pleasant East Street. Although this alternative would meet the project purpose and need, it was discarded from further consideration due to higher number of relocations, the higher costs associated with more property acquisition and excavation.

Reduce Design Speed to 30 mph: This option would reduce the design speed and subsequently the speed limit of this portion of the corridor to 30 mph from the 40 mph speed limit in other options. The corridor is posted at 30 mph in the existing condition. The rest of this corridor is being designed for 40 mph. A vertical profile developed for this alternative shows approximately three less feet of vertical cut required in the typical tangent scenario and a maximum of about five feet in the area of the crest curve. The intersections of Morris Road and Mount Pleasant East Street would still require geometric reconfiguration. Varying speed limits between 30 mph and 40 mph in the new corridor could potentially confuse drivers. The major concern about implementing a reduced design speed in this location is that driver speeds would not match the design speeds and design sight distances. This would result in potentially unsafe conditions at the intersections of Morris Road and Mount Pleasant East Street, especially when consideration is given to widening the geometry from two lanes to five. This alternative would not meet the improving safety aspect of the project purpose and need and was therefore discarded from further consideration.

### Vertical Profile in the Area of Pleasant Run Creek (Appendix I, pages 10-11)

Two Feet of Freeboard: This alternative would implement the desired structural freeboard scenario as detailed by the Indiana Design Manual (IDM) for this segment of South County Line Road between Morgantown Road and Rocky Ridge Road. This two-foot serviceability requirement would require additional fill material and up to seven relocations. Although this alternative would not hinder the project's ability to meet the project purpose and need, it was discarded from further consideration due to the property acquisition impacts.

Zero Feet of Freeboard: A zero-foot freeboard option would provide minimal improvement over the existing conditions, as it currently has negative freeboard (water encroaches into the roadway but does not "overtop"). Although this alternative would not hinder the project's ability to meet the project purpose and need, it was discarded from further consideration due to lack of drainage improvement.

### Vertical Profile East of Morgantown Road (Appendix I, pages 11-13)

Minimize Number of Vertical Curves: This option would reconfigure the existing vertical profile to reduce the number of

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curves. In the existing condition, the eastern portion of the corridor has several crest and sag curves of varying sizes. This option would reduce the overall number of vertical curves throughout, in order to provide a more streamlined corridor between Ridge Hill Drive and SR 135. Construction of this option would be more difficult due to the varying height of the proposed profile. In areas where major cuts (beneath the anticipated pavement section) are desired, retention of the existing pavement structure would be required. Similarly in areas where major fill is desired, the road would require additional horizontal stabilization during early phase work. Private drive access would be difficult to maintain through portions of the corridor, as existing drive slopes would be expected to undergo changes due to the edge of travel lane extending approximately 17 to 18 feet farther out than in the existing condition. This, combined with the addition of a sidewalk or multi-use trail, would extend the northern and southern limits of the corridor and would affect how driveways tie into South County Line Road. This option would not require purchasing right-of-way outside of the standard expectation for the corridor. Although this alternative would meet the project purpose and need, the option to implement it fully was discarded from further consideration due to the difficulties discussed above, in addition to the possibility that minimizing the number of vertical curves could also have a negative effect on speeds throughout the corridor.

Lower Profile to Reduce Earthwork Cut/Fill and Minimize Tie-In Slopes: This option would generally lower the vertical profile throughout the corridor. This option was considered due to the overall widening of the project corridor, and a portion of the existing corridor originally being built on an embankment. The corridor has identified locations where a large amount of fill will be required to widen the roadway, and this option suggests lowering the profile to reduce the amount of fill required. Construction of this option would require temporary barrier walls to be installed throughout the length of the corridor, as cuts of multiple feet would be required in some areas in order to attempt to minimize the overall earthwork of the corridor. These cuts would also be warranted in areas where multiple residences currently exist, due to potential changes in the vertical tie-in points of these driveways by multiple feet in some locations. Lowering of the profile will generate more common excavation than the other two options. The general lowering of the profile also could present challenges with outletting of stormwater within pipe networks. Although this alternative would meet the project purpose and need, it was discarded from further consideration due the difficulties discussed above.

### Bridge Alternatives for South County Line Road over Pleasant Run Creek (Appendix I, pages 29-32)

Widen the Existing Bridge: This alternative would rehabilitate the existing bridge structure to incorporate the additional lanes of the widened South County Line Road. The existing bridge has several aspects that make it undesirable for continued use. First, the bridge is undersized for the hydraulic demand. Additionally, reusing the existing bridge would eliminate the opportunity to make desirable adjustments to the profile grade that would result in improved stopping sight distance, rider comfort and balancing earthwork within the project limits which would help minimize project costs. Finally, there would be challenges associated with maintaining a bridge with elements of the existing bridge incorporated into the middle of the proposed structure. The existing bridge is 47 years old and has not received any maintenance. Incorporating the existing bridge into the proposed structure would require removing 3 to 4 feet of both copings, adding semi-integral diaphragms to the end bents and repairing the deck with full and partial depth patching, as well as applying a rigid overlay to address deterioration of the superstructure and connect the existing structure to the proposed bridge. The existing components would continue to deteriorate at a more rapid rate than the widened elements. Since the proposed bridge width will be nearly double the existing bridge width, the cost savings to incorporate the existing bridge into the new bridge is minimal compared with the total cost of construction. Although this alternative would meet the purpose and need of the project, it was withdrawn from further consideration due to the challenges described above.

Full Replacement with 27-inch by 48-inch Prestressed Concrete Box Beams: This alternative would replace the existing bridge with a three-span prestressed concrete box beam structure. This would require more long-term maintenance due to the requirements of the concrete box beam sections and would carry the second highest cost of the bridge options. In addition, it would require a higher profile grade raise than the preferred alternative, which would impact more residential drives and the amount of grade raise required on the nearby cross street (Morgantown Road). Although this alternative would meet the purpose and need of the project, it was withdrawn from further consideration due to the factors described above.

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**Full Replacement with Precast Prestressed Concrete 36-inch by 49-inch Bulb Tee Beam Bridge:** This alternative would replace the existing bridge with a three-span bulb tee beam bridge. This would carry the highest cost of the bridge options. In addition, it would require a higher profile grade raise than the preferred alternative, which would impact more residential drives and the amount of grade raise required on the nearby cross street (Morgantown Road). Although this alternative would meet the purpose and need of the project, it was withdrawn from further consideration due to the factors described above.

### **Bridge Alternatives for South County Line Road over Buffalo Creek (Appendix I, pages 51-54)**

**Widen the Existing Bridge:** This alternative would rehabilitate the existing bridge structure to incorporate the additional lanes of the widened South County Line Road. Like the description above for the bridge over Pleasant Run Creek, the existing bridge over Buffalo Creek has several aspects that make it undesirable for continued use. First, the bridge is undersized for the hydraulic demand. Additionally, reusing the existing bridge would eliminate the opportunity to make desirable adjustments to the profile grade that would result in improved stopping sight distance, rider comfort and balancing earthwork within the project limits which helps minimize project costs. Finally, there would be challenges associated with maintaining a bridge with elements of the existing bridge incorporated into the middle of the proposed structure. The existing bridge is 33 years old and has not received any maintenance. Incorporating the existing bridge into the proposed structure would require removing 3 to 4 feet of both copings and applying a rigid overlay to address deterioration of the superstructure and connect the existing structure to the proposed bridge. The existing components would continue to deteriorate at a more rapid rate than the widened elements. Since the proposed bridge width will be nearly double the existing bridge width, the cost savings to incorporate the existing bridge into the new bridge is minimal compared with the total cost of construction. Although this alternative would meet the purpose and need of the project, it was withdrawn from further consideration due to the challenges described above.

**Full Replacement with Weathering Rolled Steel Beams:** This alternative would replace the existing bridge with a three-span weathering rolled steel beam structure. This would carry the highest cost of the bridge options considered. In addition, it would require a higher profile grade raise than the preferred alternative, which would impact more residential drives and the amount of grade raise required on the nearby cross street (Leisure Lane). Although this alternative would meet the purpose and need of the project, it was withdrawn from further consideration due to the factors described above.

**Full Replacement with 21-inch by 36-inch Prestressed Concrete Box Beams:** This alternative would replace the existing bridge with a three-span prestressed concrete box beam structure. This would carry the second highest cost of the bridge options considered. It would also require higher long-term maintenance than the others due to the requirements associated with rehabilitating concrete box beam sections. In addition, it would require a higher profile grade raise than the preferred alternative, which would impact more residential drives and the amount of grade raise required on the nearby cross street (Leisure Lane). Although this alternative would meet the purpose and need of the project, it was withdrawn from further consideration due to the factors described above.

### **Do Nothing Alternative**

This alternative would allow the existing roadway and structures to remain in place with no improvements. This alternative would not involve any environmental impacts. It would result in increasing congestion and lack of mobility through the corridor. This alternative would not meet the purpose and need of the project. Therefore, this alternative has been discarded from further consideration.

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

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

X
X
X

**ROADWAY CHARACTER:**

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

Name of Roadway	South County Line Road – SR 37 (I-69) to Morgantown Road			
Functional Classification:	Principal Arterial			
Current ADT:	9,900	VPD (2023)	Design Year ADT:	20,500
Design Hour Volume (DHV):	2,980	Truck Percentage (%)	5	VPD (2043)
Designed Speed (mph):	40	Legal Speed (mph):	40	

Existing	Proposed
Number of Lanes:	2
Type of Lanes:	2 through
Pavement Width:	22 ft.
Shoulder Width:	2 ft.
Median Width:	N/A ft.
Sidewalk Width:	N/A ft.
	5-7
	4 through (11'), 1 TWLTL (13'), 2 right-turn lanes (11'), 2 left- turn lanes (11')
	57-73.5 ft.
	2 ft.
	N/A ft.
	10 ft trail & 6 ft sidewalk ft.

Setting:  Urban  Suburban  Rural  
 Topography:  Level  Rolling  Hilly

Name of Roadway	South County Line Road – Morgantown Road to Railroad Road			
Functional Classification:	Principal Arterial			
Current ADT:	11,400	VPD (2023)	Design Year ADT:	31,700
Design Hour Volume (DHV):	2,700	Truck Percentage (%)	5	VPD (2043)
Designed Speed (mph):	40	Legal Speed (mph):	40	

Existing	Proposed
Number of Lanes:	2
Type of Lanes:	2 through
Pavement Width:	22 ft.
Shoulder Width:	2 ft.
Median Width:	N/A ft.
Sidewalk Width:	N/A ft.
	5-6
	4 through (11'), 1 TWLTL (13'), 2 right-turn lanes (11'), 2 left- turn lanes (11')
	57-76 ft.
	2 ft.
	N/A ft.
	10 ft trail & 6 ft sidewalk ft.

Setting:  Urban  Suburban  Rural  
 Topography:  Level  Rolling  Hilly

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Name of Roadway South County Line Road – Railroad Road to SR 135  
 Functional Classification: Principal Arterial  
 Current ADT: 13,500 VPD (2023) Design Year ADT: 32,200 VPD (2043)  
 Design Hour Volume (DHV): 2,560 Truck Percentage (%) 5  
 Designed Speed (mph): 40 Legal Speed (mph): 40

Existing		Proposed	
Number of Lanes:		2-5	
Type of Lanes:		4 through (11'), 1 TWLTL (13')	
Pavement Width:	22-66	ft.	57-73
Shoulder Width:	2	ft.	2
Median Width:	N/A	ft.	N/A
Sidewalk Width:	where present: 5ft	ft.	10 ft trail & 6 ft sidewalk

Setting:  Urban  Suburban  Rural  
 Topography:  Level  Rolling  Hilly

Name of Roadway Morgantown Road  
 Functional Classification: Minor Arterial  
 Current ADT: 8,400 VPD (2023) Design Year ADT: 9,500 VPD (2043)  
 Design Hour Volume (DHV): 1,270 Truck Percentage (%) 2  
 Designed Speed (mph): 35 Legal Speed (mph): 35

Existing		Proposed	
Number of Lanes:		2-3	
Type of Lanes:		1-2 through (12'), 1 through-right-turn lane (12'), 1 left-turn lane (12')	
Pavement Width:	22-36	ft.	22-44
Shoulder Width:	2	ft.	2
Median Width:	N/A	ft.	N/A
Sidewalk Width:	N/A	ft.	6

Setting:  Urban  Suburban  Rural  
 Topography:  Level  Rolling  Hilly

Name of Roadway Railroad Road  
 Functional Classification: Major Collector  
 Current ADT: 5,700 VPD (2023) Design Year ADT: 9,100 VPD (2043)  
 Design Hour Volume (DHV): 930 Truck Percentage (%) 1  
 Designed Speed (mph): 40 Legal Speed (mph): 40

Existing		Proposed	
Number of Lanes:		2	
Type of Lanes:		2 through (11')	
Pavement Width:	22	ft.	22-33
Shoulder Width:	2	ft.	2
Median Width:	N/A	ft.	N/A
Sidewalk Width:	N/A	ft.	N/A

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Setting:	<input checked="" type="checkbox"/> Urban <input checked="" type="checkbox"/> Level		Suburban			Rural		
Topography:			Rolling			Hilly		
Name of Roadway	Peterman Road							
Functional Classification:	Major Collector							
Current ADT:	5,700	VPD (2023)	Design Year ADT:	9,100	VPD (2043)			
Design Hour Volume (DHV):	930	Truck Percentage (%)	1					
Designed Speed (mph):	40	Legal Speed (mph):	40					

Existing	Proposed
Number of Lanes: 2	2-4
Type of Lanes: 2 through (11')	2 through (11'), 1 left-turn lane (11'), 1 right-turn lane (11')
Pavement Width: 22 ft.	22-44 ft.
Shoulder Width: 2 ft.	2 ft.
Median Width: N/A ft.	N/A ft.
Sidewalk Width: N/A ft.	N/A ft.

Setting:	<input checked="" type="checkbox"/> Urban <input checked="" type="checkbox"/> Level		Suburban			Rural		
Topography:			Rolling			Hilly		

Name of Roadway	Morris Road							
Functional Classification:	Local Road							
Current ADT:	N/A	VPD (2023)	Design Year ADT:	N/A	VPD (2043)			
Design Hour Volume (DHV):	N/A	Truck Percentage (%)	N/A					
Designed Speed (mph):	25	Legal Speed (mph):	25					

Existing	Proposed
Number of Lanes: 2	1
Type of Lanes: 2 through (10')	Cul-de-sac
Pavement Width: 20 ft.	20-76 ft.
Shoulder Width: 0 ft.	2 ft.
Median Width: N/A ft.	N/A ft.
Sidewalk Width: N/A ft.	N/A ft.

Setting:	<input checked="" type="checkbox"/> Urban <input checked="" type="checkbox"/> Level		Suburban			Rural		
Topography:			Rolling			Hilly		

Name of Roadway	Mount Pleasant East Street							
Functional Classification:	Local Road							
Current ADT:	N/A	VPD (2023)	Design Year ADT:	N/A	VPD (2043)			
Design Hour Volume (DHV):	N/A	Truck Percentage (%)	N/A					
Designed Speed (mph):	25	Legal Speed (mph):	25					

Existing	Proposed
Number of Lanes: 2	1
Type of Lanes: 2 through (10')	Cul-de-sac
Pavement Width: 20 ft.	20-76 ft.
Shoulder Width: 2 ft.	2 ft.
Median Width: N/A ft.	N/A ft.
Sidewalk Width: N/A ft.	N/A ft.

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Setting:	<input checked="" type="checkbox"/> <input type="checkbox"/> Urban	<input type="checkbox"/> <input checked="" type="checkbox"/> Suburban	<input type="checkbox"/> <input checked="" type="checkbox"/> Rural
Topography:	<input checked="" type="checkbox"/> <input type="checkbox"/> Level	<input type="checkbox"/> <input checked="" type="checkbox"/> Rolling	<input type="checkbox"/> <input checked="" type="checkbox"/> Hilly

Name of Roadway	Mount Pleasant South Street			
Functional Classification:	Local Road			
Current ADT:	N/A	VPD (2023)	Design Year ADT:	N/A
Design Hour Volume (DHV):	N/A	Truck Percentage (%)	N/A	VPD (2043)
Designed Speed (mph):	25	Legal Speed (mph):	25	

Existing	Proposed			
Number of Lanes:	2			
Type of Lanes:	2 through (10')			
Pavement Width:	20	ft.	22	ft.
Shoulder Width:	0	ft.	0	ft.
Median Width:	N/A	ft.	N/A	ft.
Sidewalk Width:	N/A	ft.	N/A	ft.

Setting:	<input checked="" type="checkbox"/> <input type="checkbox"/> Urban	<input type="checkbox"/> <input checked="" type="checkbox"/> Suburban	<input type="checkbox"/> <input checked="" type="checkbox"/> Rural
Topography:	<input checked="" type="checkbox"/> <input type="checkbox"/> Level	<input type="checkbox"/> <input checked="" type="checkbox"/> Rolling	<input type="checkbox"/> <input checked="" type="checkbox"/> Hilly

The above Roadway Character tables do not include the cross streets where only tie-in work will occur. The cross streets that have not been included above are local roads with no traffic data available, and their typical cross sections will not be altered by the project. The information above can also be found in the roadway plans in Appendix B, pages 67-152.

## BRIDGES AND/OR SMALL STRUCTURE(S):

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

Structure/NBI Number(s):	49-4503F (NBI 4900420)	Sufficiency Rating:	70.6 (INDOT Bridge Inspection Report dated December 28, 2022)
			(Rating, Source of Information)

Existing	Proposed		
Bridge/Structure Type:	concrete box beam bridge		
Number of Spans:	3		
Weight Restrictions:	33	ton	N/A
Height Restrictions:	N/A	ft.	N/A
Curb to Curb Width:	28	ft.	61
Outside to Outside Width:	31.5	ft.	84.17
Shoulder Width:	2	ft.	2

*Describe impacts and work involving bridge(s), culvert(s), pipe(s), and small structure(s). Provide details for small structure(s): structure number, type, size (length and dia.), location and impacts to water. Use a table if the number of small structures becomes large. If the table exceeds a complete page, put it in the appendix and summarize the information below with a citation to the table.*

The existing structure (Structure No. 49-4503F) carries South County Line Road over Pleasant Run Creek. It is a concrete box beam, continuous 3-span bridge with spans of 41'-3", 49'-6", and 41'-3". The existing superstructure is supported by end bents with spill slopes on piles and hammerhead piers on spread footings. The existing bridge was built in 1973, and no rehabilitations are on record. The out-to-out bridge deck length is 134'-10.5". The out-to-out coping

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width is 31'-6" with a clear roadway width of 28'-0". The existing bridge does not provide adequate hydraulic opening.

This bridge is not eligible for listing in the National Register of Historic Places (NRHP) according to the Indiana Historic Bridge Inventory.

The existing bridge will be replaced to accommodate the additional travel lanes and address deficiencies in hydraulics.

Structure/NBI Number(s):

49-4510F (NBI 4900427)

Sufficiency Rating:

95.9 (INDOT Bridge Inspection Report Dated December 21, 2022)  
(Rating, Source of Information)

Existing		Proposed	
Bridge/Structure Type:		continuous reinforced concrete slab bridge	
reinforced concrete slab			
Number of Spans:		3	3
Weight Restrictions:	36	ton	N/A
Height Restrictions:	N/A	ft.	N/A
Curb to Curb Width:	44	ft.	61
Outside to Outside Width:	47	ft.	84' 2"
Shoulder Width:	10	ft.	2

*Describe impacts and work involving bridge(s), culvert(s), pipe(s), and small structure(s). Provide details for small structure(s): structure number, type, size (length and dia.), location and impacts to water. Use a table if the number of small structures becomes large. If the table exceeds a complete page, put it in the appendix and summarize the information below with a citation to the table.*

The existing structure (Structure No. 49-4510F) carries South County Line Road over Buffalo Creek. It was built in 1987 and is a reinforced concrete slab, continuous 3-span bridge with spans of 24'-10", 29'-10", and 24'-10". The existing bridge does not provide adequate hydraulic opening.

This bridge is not eligible for listing in the NRHP according to the Indiana Historic Bridge Inventory.

The existing bridge will be replaced to accommodate the additional travel lanes and address deficiencies in hydraulics.

Structure/NBI Number(s):

Various Culverts and Pipes

Sufficiency Rating:

Various

(Rating, Source of Information)

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

*Describe impacts and work involving bridge(s), culvert(s), pipe(s), and small structure(s). Provide details for small structure(s): structure number, type, size (length and dia.), location and impacts to water. Use a table if the number of small structures becomes large. If the table exceeds a complete page, put it in the appendix and summarize the information below with a citation to the table.*

Approximately 55 existing culverts and pipes are located within the project area. Of that total, approximately five structures will be left in place. The remaining structures will be removed and replaced with the proposed enclosed storm sewer system. Approximately 22 new structures are proposed. The majority of the new structures will be stormsewer outfall pipes. Details of the location, size, and material for each structure can be found in Appendix I, pages 3-5.

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## MAINTENANCE OF TRAFFIC (MOT) DURING CONSTRUCTION:

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

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

The project will be constructed in two contracts. Part 1 will be constructed from the western termini to east of Rock Island Court. The remainder of the project will be constructed in Part 2. Traffic will be maintained in six phases, with Phases 1-3 occurring during Part 1 of construction and Phases 4-6 occurring during Part 2 of construction (Appendix B, pages 66 and 87-119). Phase 1 will require a full closure with a detour of South County Line Road between Morris Road and Rocky Ridge Road. Pleasant Run Creek Bridge will be constructed, temporary pavement will be installed, and a new alignment extension of Mount Pleasant Street South Street will occur during Phase 1. The detour for this closure will be approximately 3 miles long and be in place for up to one construction season. Access to the I-69 and South County Line Road interchange will be limited with the majority of traffic detoured to Bluff Road or north to the Southport Road interchange.

Phase 2 will maintain two-way traffic while the westbound lanes of South County Line Road are constructed between Rocky Ridge Road and Rock Island Court. Portions of Phase 2 traffic maintenance will require temporary signals due to available pavement for vehicles.

Phase 3 will maintain two-way traffic while the eastbound lanes are constructed between Rocky Ridge Road and Rock Island Court.

For Part 2 of construction, Phase 4 will maintain two-way traffic while the eastbound lanes of South County Line Road are constructed between Rock Island Court and Illinois Street, and the eastbound lanes of Buffalo Creek Bridge are constructed. Temporary pavement for the MOT will be required in portions of this corridor.

Phase 5 will maintain two-way traffic while the westbound lanes are constructed between Rock Island Court and Illinois Street. The westbound lanes of the Buffalo Creek Bridge will be constructed, and Railroad Road and Peterman Road will be reconstructed as necessary due to intersection and drainage improvements. A detour route will be required during this reconstruction.

During Phase 6, incidental tie-in work will occur at the eastern limit of the project.

Throughout the project corridor, there are approximately three segments of existing sidewalk that are not connected to any other pedestrian facilities. Therefore, no pedestrian detours will be required. Signs will be used to alert the public when those sidewalk segments are closed during construction.

Access to all businesses and residences will be maintained throughout the project. A draft Traffic Management Plan (TMP) has been completed and will be finalized as project design progresses.

The closures/lane restrictions will pose a temporary inconvenience to traveling motorists (including school buses and

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emergency services); however, no significant delays are anticipated, and all inconveniences and delays will cease upon project completion.

## ESTIMATED PROJECT COST AND SCHEDULE:

Engineering: \$ 2,600,000 (2022-2023) Right-of-Way: \$ 3,600,000 (2022-2023) Construction: \$ 43,390,000 (2024)

Anticipated Start Date of Construction: Winter 2024

## RIGHT OF WAY:

Land Use Impacts	Amount (acres)	
	Permanent	Temporary
Residential	11.936	5.333
Commercial	0.164	0.087
Agricultural	5.377	21.895
Forest	4.606	2.764
Wetlands	0.000	0.000
Other: Railroad	0.308	0.171
Other: Religious Facilities	0.423	0.389
<b>TOTAL</b>	<b>22.815</b>	<b>30.638</b>

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

The existing right-of-way width varies throughout the project ranging from approximately the edge of pavement to 50 feet from the edge of pavement (Appendix B, pages 120-150).

In the area of the bridges, existing permanent right-of-way varies from 45 to 50 feet from the centerline of South County Line Road.

The project requires 22.815 acres of permanent right-of-way for construction of added travel lanes, retaining walls, drainage improvements, bridge replacements, and pedestrian facilities. Typical proposed right-of-way width is generally 119 feet. The project requires 30.638 acres of temporary right-of-way for earthwork placement, driveway reconstruction, and grading. The grading is necessary to tie in the adjusted roadway profile to residential yards and to perpetuate drainage.

Proposed right-of-way widths along South County Line Road will be approximately 52 to 60 feet from the centerline along majority of the project length. Proposed right-of-way widths within the area of the vertical curve correction will be 120 feet from centerline. Temporary right-of-way widths vary along South County Line Road and typically include 10 to 20 feet at driveway and side roads for reconstruction. No re-acquisition of apparent existing right-of-way is anticipated.

Acquisition of the 124 parcels needed for the project is underway under early acquisition following the regulations as stated in the Uniform Act 23 CFR 710.501, with the exception of properties that have been identified as Section 4(f) protected resources. The acquisition of the parcels has been completely funded by local funds from the Indianapolis Department of Public Works (DPW).

If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division (ESD) and the INDOT Greenfield and Seymour Districts' Environmental Sections will be contacted immediately.

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

**SECTION A - EARLY COORDINATION:**

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

Early coordination letters were sent on January 8, February 8, May 26, June 25, and November 22, 2021, and on May 10, 2023 (Appendix C, pages 1-8).

Agency	Date Sent	Date Response Received	Appendix
City of Indianapolis, DPW	January 8, 2021 & November 22, 2021	No response received	N/A
Marion County Surveyor	January 8, 2021 & November 22, 2021	January 11, 2021	Appendix C, pages 28-32
Marion County Sheriff	January 8, 2021 & November 22, 2021	No response received	N/A
Indianapolis MS4 Coordinator	January 8, 2021 & November 22, 2021	January 25, 2021 & November 29, 2021	Appendix C, pages 53-54
INDOT Communications	January 8, 2021 & November 22, 2021	No response received	N/A
Indiana Department of Natural Resources (IDNR), Division of Oil and Gas	January 8, 2021 & November 22, 2021	November 23, 2021	Appendix C, page 58
INDOT Office of Aviation	January 8, 2021 & November 22, 2021	January 11, 2021 & November 23, 2021	Appendix C, pages 21-22
Indiana Department of Natural Resources, Division of Fish and Wildlife (IDNR-DFW)	January 8, 2021 & November 22, 2021	February 5, 2021 & December 22, 2021	Appendix C, pages 12-20
Indiana Department of Environmental Management (IDEM), Groundwater Section	January 8, 2021 & November 22, 2021	February 5, 2021 & December 17, 2021	Appendix C, pages 41-45
Natural Resources Conservation Service (NRCS)	January 8, 2021 & November 22, 2021	February 18, 2021 & December 20, 2021	Appendix C, pages 46-49
US Army Corps of Engineers (USACE), Louisville District	January 8, 2021 & November 22, 2021	No response received	N/A
US Department of Housing and Urban Development (USHUD)	January 8, 2021 & November 22, 2021	No response received	N/A
US Fish and Wildlife Service (USFWS)	January 8, 2021 & November 22, 2021	January 27, 2021 and November 24, 2021	Appendix C, pages 9-11
INDOT Environmental Section, Greenfield District	January 8, 2021 & November 22, 2021	No response received	N/A
INDOT Environmental Section, Seymour District	January 8, 2021 & November 22, 2021	No response received	N/A
National Parks Service (NPS), Midwest Regional Office	January 8, 2021 & November 22, 2021	No response received	N/A
FHWA	January 8, 2021 & November 22, 2021	No response received	N/A
City of Indianapolis City Council	January 8, 2021 & November 22, 2021	No response received	N/A
City of Indianapolis Fire Chief	January 8, 2021 & November 22, 2021	No response received	N/A
City of Indianapolis Mayor	January 8, 2021 &	No response received	N/A

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	November 22, 2021		
City of Indianapolis, Department of Metropolitan Development	January 8, 2021 & November 22, 2021	No response received	N/A
Indianapolis Metropolitan Police Department	January 8, 2021 & November 22, 2021	No response received	N/A
IndyGo	January 8, 2021 & November 22, 2021	February 5, 2021 & December 2, 2021	Appendix C, pages 39-40
Indianapolis Metropolitan Planning Organization (IMPO)	January 8, 2021 & November 22, 2021	No response received	N/A
Marion County Board of Commissioners	January 8, 2021 & November 22, 2021	No response received	N/A
Marion County Emergency Services	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Commissioners	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Council	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Emergency Management	January 8, 2021 & November 22, 2021	No response received	N/A
Center Grove Community School Corporation	January 8, 2021 & November 22, 2021	February 4, 2021	Appendix C, page 38
Perry Township Office	January 8, 2021 & November 22, 2021	No response received	N/A
White River Township Office	January 8, 2021 & November 22, 2021	No response received	N/A
White River Township Fire Department	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Fire Department	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Mayor	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Common Council	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Community Development Services	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Parks Department	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Stormwater Department	January 8, 2021 & November 22, 2021	No response received	N/A
Greenwood Police Department	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Sheriff	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Highway Department	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Planning and Zoning	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Surveyor	January 8, 2021 & November 22, 2021	January 15, 2021	Appendix C, page 27
Johnson County Parks and Recreation	January 8, 2021 & November 22, 2021	No response received	N/A
Perry Township Schools	January 8, 2021 &	No response received	N/A

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	November 22, 2021		
Access Johnson County/Gateway Services	January 8, 2021 & November 22, 2021	No response received	N/A
Johnson County Soil and Water Conservation District	January 8, 2021 & November 22, 2021	No response received	N/A
Marion County Soil and Water Conservation District	January 8, 2021 & November 22, 2021	January 26, 2021	Appendix C, pages 33-37
INDOT Environmental Policy Manager	January 8, 2021 & November 22, 2021	January 22, 2021	Appendix C, pages 23-24
Carefree Club	January 8, 2021 & November 22, 2021	No response received	N/A
Indiana American Water	January 8, 2021 & November 22, 2021	January 13, 2021	Appendix C, page 52
Grace Baptist Church	January 8, 2021 & November 22, 2021	No response received	N/A
INDOT I-69 Section 6 Project Manager	January 8, 2021 & November 22, 2021	No response received	N/A
SecurCare Self-Storage	January 8, 2021 & November 22, 2021	No response received	N/A
Texas Eastern Transmission Corp. / Enterprise Products Company	January 8, 2021 & November 22, 2021	January 12, 2021	Appendix C, page 55-57
Johnson County Highway Department	January 8, 2021 & November 22, 2021	No response received	N/A
Indiana Geological and Water Survey (IGWS) (via online form)	October 9, 2023	October 9, 2023	Appendix C, pages 25-26
Citizens Energy Group (CEG)	February 8, 2021 & November 22, 2021	February 8, 2021 & November 23, 2021	Appendix C, pages 50-51
Indiana Rail Road Company	May 26, 2021 & November 22, 2021	May 26, 2021	Appendix C, pages 59-60
City of Indianapolis Floodplain Administrator	May 10, 2023	No response received	N/A
Johnson County Floodplain Administrator	May 10, 2023	No response received	N/A
CenterPoint Energy	October 2, 2023	No response received	N/A

All applicable recommendations are included in the Environmental Commitments section of this CE document.

## SECTION B – ECOLOGICAL RESOURCES:

**Streams, Rivers, Watercourses & Other Jurisdictional Features**  
 Federal Wild and Scenic Rivers  
 State Natural, Scenic or Recreational Rivers  
 Nationwide Rivers Inventory (NRI) listed  
 Outstanding Rivers List for Indiana  
 Navigable Waterways

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

Total stream(s) in project area: 2,271 Linear feet      Total impacted stream(s): 581 Linear feet

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Stream Name	Classification	Total Size in Project Area (linear feet)	Impacted linear feet	Comments (i.e. location, flow direction, likely Water of the US, appendix reference)
Buffalo Creek	R2UBH	500	145 <sup>1</sup>	Flows south from South County Line Road to Pleasant Run Creek, and eventually to the White River, a Traditionally Navigable Waterway (TNW). Buffalo Creek is likely a Water of the US (Appendix F, page 26).
Pleasant Run Creek	R2UBH	1156	185 <sup>1</sup>	Flows northwest from South County Line Road to the White River, a TNW. Pleasant Run Creek is likely a Water of the US (Appendix F, page 23).
Unnamed Tributary (UNT) - 1 to Pleasant Run Creek	R6	110	65	Flows north from South County Line Road to Pleasant Run Creek and eventually to the White River, a TNW. UNT 1 to Pleasant Run Creek is not likely a Water of the US <sup>1</sup> (Appendix F, page 23). <sup>2</sup>
UNT 1 to Buffalo Creek	R6	201	150 <sup>1</sup>	Flows northwest from South County Line Road to Buffalo Creek, Pleasant Run Creek, and eventually to the White River, a TNW. UNT 1 to Buffalo Creek is not likely a Water of the US (Appendix F, page 26). <sup>2</sup>
UNT 2 to Buffalo Creek	R6	224	130 <sup>1</sup>	Flows northwest from South County Line Road to Buffalo Creek, Pleasant Run Creek, and eventually to the White River, a TNW. UNT 2 to Buffalo Creek is not likely a Water of the US (Appendix F, page 26). <sup>2</sup>
UNT 3 to Buffalo Creek	R6	80	0	Flows northwest from South County Line Road to Buffalo Creek, Pleasant Run Creek, and eventually to the White River, a TNW. UNT 3 to Buffalo Creek is not likely not a Water of the US (Appendix F, page 27). <sup>2</sup>

1. Length of impacts includes both permanent and temporary impacts.

2. Jurisdictional discussions are based on a previously approved jurisdictional determination (JD) (Appendix F, pages 102-116).

Regulations have changed, and jurisdictional determinations may change when the project is permitted for impacts to water resources.

*Describe all streams, rivers, watercourses and other jurisdictional features adjacent or within the project area. Include whether or not impacts (both permanent and temporary) will occur to the features identified. Include if the streams or rivers are listed on any federal or state lists for Indiana. Include if features are likely subject to federal or state jurisdiction. Discuss measures to avoid, minimize, and mitigate if impacts will occur.*

Based on the desktop review, the aerial map of the project area (Appendix B, pages 2-5), and the RFI report (Appendix E, pages 1-17), there are six streams, rivers, watercourse or other jurisdictional features within the 0.5-mile search radius. There are two streams, Buffalo Creek and Pleasant Run Creek, within the project area. That number was updated to six by the site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB.

A *Waters of the U.S. Determination / Wetland Delineation Report* was completed by HNTB on October 26, 2020 and revised on August 22, 2023. Please refer to Appendix F, pages 1-97 for the *Waters of the U.S. Determination / Wetland Delineation Report*. It was determined there were two likely and four unlikely jurisdictional waterways within the investigated area. The USACE approved the original determination on February 9, 2021 (Appendix F, pages 102-116). Note that during the permitting phase it is likely that this jurisdictional determination will be revised.

No streams or rivers within the project area are listed as Federal, Wild and Scenic Rivers; State Natural, Scenic, and Recreational Rivers; Outstanding Rivers for Indiana; navigable waterways; or National Rivers Inventory waterways.

### **Buffalo Creek (Appendix F, page 26)**

The ordinary high-water mark (OHWM) of Buffalo Creek is 19 feet wide by 3 feet deep. According to the classification codes developed by Cowardin et al. (1979), this stream feature would be classified as a riverine, lower perennial, unconsolidated bottom, permanently flooded wetland (R2UBH) resource. Buffalo Creek is mapped as a United States Geological Survey (USGS) Blueline stream. This jurisdictional feature is hydrologically connected to Pleasant Run Creek and the White River, a TNW. According to the USGS StreamStats website (<https://www.usgs.gov/streamstats/indiana-streamstats>), Buffalo Creek drains 3.776 square miles at the crossing of South County Line Road. This stream has a silt, cobble and gravel substrate and well-developed glide complexes. Upstream and downstream of the existing structure the stream bed has been armored with riprap. The riparian area is

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poorly developed within the investigated area and consists of a very narrow wooded area that is bordered by several residential subdivisions. A total of approximately 500 linear feet of stream length lies within the investigated area. Based on a qualitative evaluation, Buffalo Creek is a good quality resource due to the streambed type, flow, and surrounding vegetation. Buffalo Creek is listed as impaired for *E. coli* and Impaired Biotic Communities (IBCs) on the Indiana 303(d) List of Impaired Waters. A total of 145 linear feet of this feature will be permanently or temporary impacted by replacement of the existing bridge structure with a wider structure, placement of a new stormwater outfall, and temporary construction access and dewatering. This includes 85 linear feet of permanent impacts for the new bridge structure, 20 linear feet of permanent impacts for a new stormwater outfall, and 40 linear feet of temporary impacts for construction.

### **Pleasant Run Creek (Appendix F, page 23)**

The OHWM of Pleasant Run Creek is 30 feet wide by 1 foot deep. According to the classification codes developed by Cowardin et al. (1979), this stream feature would be classified as a riverine, lower perennial, unconsolidated bottom, permanently flooded wetland (R2UBH) resource. Pleasant Run Creek is mapped as a USGS Blueline stream. This jurisdictional feature is hydrologically connected to the White River, a TNW. According to the USGS StreamStats website, (<https://water.usgs.gov/osw/streamstats/indiana.html>), Pleasant Run Creek drains 20.55 square miles at the crossing of South County Line Road. This stream has a cobble and gravel substrate and well-developed riffle-run-pool complexes. The riparian corridor is well developed and forested, although invasive bush honeysuckle is prevalent. A total of approximately 1,156 linear feet of stream length lies within the investigated area. Based on a qualitative evaluation of Pleasant Run Creek, it is a good quality resource due to the dominant vegetation, streambed quality, and well-developed riparian corridor. Pleasant Run Creek is listed as impaired for *E. coli* and IBCs on the Indiana 303(d) List of Impaired Waters. A total of 185 linear feet of this feature will be permanently or temporarily impacted by replacement of the existing bridge structure with a wider structure, placement of a new stormwater outfall, and temporary construction access and dewatering. This includes 85 linear feet of permanent impacts for the new bridge structure, 40 linear feet of this of permanent impacts for a new stormwater outfall, and 60 linear feet of temporary impacts for construction.

### **UNT 1 to Pleasant Run Creek (Appendix F, page 23)**

The OHWM of UNT 1 to Pleasant Run Creek is 18 inches wide by 14 inches deep. According to the classification codes developed by Cowardin et al. (1979), this stream feature would be classified as a riverine, ephemeral (R6) resource. The resource originates on the north side of South County Line Road at a stormwater pipe outfall and drains north to Pleasant Run Creek. UNT 1 to Pleasant Run Creek is not mapped as a USGS Blueline stream. This feature is an ephemeral stream and therefore is not likely a jurisdictional feature. According to the USGS StreamStats website, (<https://water.usgs.gov/osw/streamstats/indiana.html>), this feature is not mapped. This stream has silt/mud substrate with no riffles. This channel crosses the floodway of Pleasant Run Creek. A total of approximately 110 linear feet of stream length lies within the investigated area. Based on a qualitative evaluation, UNT 1 to Pleasant Run Creek is a poor-quality resource due to its substrate quality, streambed type, and lack of flow. A total of 65 linear feet of this feature will be permanently impacted by roadway widening and drainage outfalls.

### **UNT 1 to Buffalo Creek (Appendix F, page 26)**

The OHWM of UNT 1 to Buffalo Creek is 3 feet wide by 12 inches deep. According to the classification codes developed by Cowardin et al. (1979), this stream feature would be classified as a riverine, ephemeral (R6) resource. The resource originates on the north side of South County Line Road in a roadside ditch and drains northwest to Buffalo Creek. UNT 1 to Buffalo Creek is not mapped as a USGS Blueline stream. This feature is an ephemeral stream and therefore is not likely a jurisdictional feature. According to the USGS StreamStats website, (<https://water.usgs.gov/osw/streamstats/indiana.html>), this feature is not mapped. This stream has silt/mud substrate with no riffles. This channel crosses the floodway of Buffalo Creek and passes through Wetland A. A total of approximately 201 linear feet of stream length lies within the investigated area. Based on a qualitative evaluation, UNT 1 to Buffalo Creek is a poor-quality resource due to its substrate quality, streambed type, and lack of flow. A total of 150 linear feet of this feature will be permanently or temporarily impacted by roadway widening and drainage outfalls, as well as construction access. This includes 130 linear feet of permanent impacts for roadway widening and drainage outfalls, and 20 feet of temporary impacts for construction.

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### **UNT 2 to Buffalo Creek (Appendix F, page 26)**

The OHWM of UNT 2 to Buffalo Creek is a 4.17 feet wide by 16 inches deep. According to the classification codes developed by Cowardin et al. (1979), this stream feature would be classified as a riverine, ephemeral (R6) resource. UNT 2 to Buffalo Creek is not mapped as a USGS Blueline stream. The resource originates on the north side of South County Line Road in a roadside ditch at a stormwater outfall and drains northwest to Buffalo Creek. This feature is an ephemeral stream and therefore is not likely a jurisdictional feature. According to the USGS StreamStats website (<https://streamstats.usgs.gov/ss/>), this feature is not mapped. This stream has silt/mud substrate with no riffles. A total of approximately 224 linear feet of stream length lies within the investigated area. Based on a qualitative evaluation, UNT 2 to Buffalo Creek is a poor-quality resource due to its substrate quality, streambed type, and lack of flow. A total of 130 linear feet of this feature will be permanently or temporarily impacted by roadway widening and drainage outfalls, as well as construction. This includes 110 linear feet of permanent impacts for roadway widening and drainage outfalls, and 20 feet of temporary impacts for construction.

### **UNT 3 to Buffalo Creek (Appendix F, page 27)**

The OHWM of UNT 3 to Buffalo Creek is 6 feet wide by 18 inches deep. According to the classification codes developed by Cowardin et al. (1979), this stream feature would be classified as a riverine, ephemeral (R6) resource. UNT 3 to Buffalo Creek is not mapped as a USGS Blueline stream. The resource originates north of South County Line Road at the outfall from Pond 2 and drains northwest to Buffalo Creek. This feature is an ephemeral stream and therefore is not likely a jurisdictional feature. According to the USGS StreamStats website, (<https://water.usgs.gov/osw/streamstats/indiana.html>), this feature is not mapped. This stream has a riprap substrate and no riffles. A total of approximately 80 linear feet of stream length lies within the investigated area. Based on a qualitative evaluation, UNT 3 to Buffalo Creek is a poor-quality resource due to its substrate quality, streambed type, and lack of flow. This feature will not be impacted by the project.

### **Roadside Drainage**

The site investigation identified one concrete lined roadside drainage feature/roadside ditch (RSD). RSD 1 is 3.5 feet wide and 288 feet long within the investigated area. RSD 1 receives drainage from the roadside to the west and the north via a culvert under South County Line Road. RSD 1 is a constructed channel which is lined with concrete or armored with riprap through portions of the channel. This entire feature will be removed by the roadway widening and replaced with an encapsulated storm sewer system.

### **Early Coordination**

USFWS responded on January 27, 2021, with recommendations to avoid or minimize impacts to riparian and stream habitat (Appendix C, pages 9-11). The recommendations include measures to restrict below low-water work in streams and minimize impacts; span the active stream channel; restrict channel work to the minimum necessary for installation of the stream crossing structure; minimize the extent of hard armor (riprap) in bank stabilization by using bioengineering techniques; 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); and evaluate wildlife crossings under bridge/culverts projects in appropriate situations. In addition, USFWS recommends using pollutant-trapping technology to reduce the runoff of urban pollutants directly into the streams and limitations on tree clearing or vegetation removal outside the construction zone boundaries.

IDNR-DFW responded on February 5, 2021, and December 22, 2021, with recommendations to avoid or minimize impacts to streams and fish and wildlife habitat (Appendix C, pages 12-20). Recommendations included both permanent and temporary measures to minimize impacts and limit disturbance. The recommendations include to maintain fish and wildlife passage through a crossing structure; to span the entire channel width; to minimize and contain within the project limits in channel disturbance and the clearing of trees and brush; to not work in the waterway from April 1 through June 30 without the prior written approval of the Division of Fish and Wildlife; to not excavate in the low flow area except for the placement of piers, foundations, and riprap, or removal of the old structure; to not construct any temporary runarounds, access bridges, causeways, cofferdams, diversions, or pumparounds; to operate equipment used to replace the bridge from the existing roadway; and standard sediment and erosion control commitments. In addition, guidelines for trail design were included.

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All applicable recommendations are included in the Environmental Commitments section of this CE document.

Open Water Feature(s)	Presence		Impacts	
	Yes	No	Yes	No
Reservoirs				
Lakes				
Farm Ponds				
Retention/Detention Basin	X			
Storm Water Management Facilities			X	
Other: _____				

*Describe all open water feature(s) identified adjacent or within the project area. Include whether or not impacts (both permanent and temporary) will occur to the features identified. Include if features are likely subject to federal or state jurisdiction. Discuss measures to avoid, minimize, and mitigate if impacts will occur.*

Based on the desktop review, the aerial map of the project area, and the RFI report (Appendix E, pages 1-17), there are three open water features within the 0.5-mile search radius. There are no open water features mapped within the project area. Two ponds were identified during site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB; however, these ponds are outside the construction limits and will not be impacted.

A *Waters of the U.S. Determination / Wetland Delineation Report* was completed by HNTB on October 26, 2020 and revised on August 22, 2023. Please refer to Appendix F, pages 1-97 for the *Waters of the U.S. Determination / Wetland Delineation Report*. It was determined there were two ponds within the investigated area. The USACE approved this determination on February 9, 2021 (Appendix F, pages 102-116). Note that during the permitting phase it is likely that this jurisdictional determination will be revised.

### **Pond 1 (Appendix F, page 23)**

Pond 1 is newly constructed and receives stormwater from the Pleasant Valley residential subdivision. The pond is surrounded by mowed and maintained grassed area and is approximately 0.53 acre in size. The floodway between this pond and Pleasant Run Creek has recently been planted with woody vegetation. This pond drains northeast via a pipe to Pleasant Run Creek. The pipe outfall is located just south of South County Line Road and is visible in Photo 47 (Appendix B, page 37). This pond will not be impacted by the project.

### **Pond 2 (Appendix F, page 27)**

Pond 2 is also a constructed stormwater retention pond that receives stormwater from the Classic View residential subdivision. This pond is noted on the National Wetland Inventory as a palustrine, unconsolidated bottom, intermittently exposed, excavated (PUBGx) resource. This pond is surrounded by residential homes and mowed and maintained grassed area on the north and east, by the South County Line Road right-of-way on the south, and by a forested area to the west. It is approximately 0.28 acre in size. This pond drains northwest to Buffalo Creek via UNT 3 to Buffalo Creek. This pond will not be impacted by the project.

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Wetlands	<u>Presence</u>		<u>Impacts</u>	
	Yes	No	X	

Total wetland area: 0.05 Acre(s) Total wetland area impacted: 0.05 Acre(s)

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

Wetland No.	Classification	Total Size (Acres)	Impacted Acres	Comments (i.e. location, likely Water of the US, appendix reference)
A	PEM1/FO1A	0.05	0.05	Located approximately 150 feet northeast of the South County Line Road and Leisure Lane intersection, not likely a Water of the US (Appendix F, pages 7, 8, and 26) <sup>1</sup>

1. Jurisdictional discussions are based on a previously approved jurisdictional determination (JD) (Appendix F, pages 102-116). Regulations have changed, and jurisdictional determinations may change when the project is permitted for impacts to water resources.

### **Wetlands (Mark all that apply)**

Wetland Determination  
Wetland Delineation  
USACE Isolated Waters Determination

### Documentation

X

### ESD Approval Dates

N/A

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

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

X

*Describe all wetlands identified adjacent or within the project area. Include whether or not impacts (both permanent and temporary) will occur to the features identified. Include if features are likely subject to federal or state jurisdiction. Discuss measures to avoid, minimize, and mitigate if impacts will occur.*

Based on the desktop review, the aerial map of the project area, and the RFI report (Appendix E, pages 1-17), there are 19 wetlands within the 0.5-mile search radius. There is one wetland mapped within the project area. This number was confirmed during site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB.

A *Waters of the U.S. Determination / Wetland Delineation Report* was completed by HNTB on October 26, 2020, and revised on August 22, 2023. Please refer to Appendix F, pages 1-97 for the *Waters of the U.S. Determination / Wetland Delineation Report*. It was determined there is one non-jurisdictional wetland within the investigated area. The USACE approved this determination on February 9, 2021 (Appendix F, pages 102-116). Note that during the permitting phase it is likely that this jurisdictional determination will be revised.

### **Wetland A (Appendix F, page 26)**

Wetland A is a palustrine, emergent, persistent, temporarily flooded and a palustrine, forested, persistent, temporarily flooded (PEM1/FO1A) wetland according to the classifications defined by Cowardin et al. (1979). Wetland A is 0.05 acre in size. This wetland developed due to ponding in a roadside ditch within a floodplain. This wetland is not mapped as a National Wetlands Inventory (NWI) wetland. Wetland A is bounded on the south side by the roadside slope to South County Line Road and on the north by a small topographic rise to a field. Wetland A is not likely a water of the US, as it is confined to a roadside drainage system and connected to a traditionally navigable waterway by ephemeral or overland flow. As such, this wetland is likely isolated and a water of the State. Based on a qualitative analysis of Wetland A, this wetland is of poor quality based on its position within a roadside ditch. This entire feature (0.05 acre) will be permanently impacted by the proposed roadway widening and the installation of drainage outfalls.

### **Early Coordination**

USFWS responded on January 27, 2021, with recommendations to avoid or minimize impacts to wetlands and

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recommendations for wetland mitigation and habitat restoration (Appendix C, pages 9-11).

IDNR-DFW responded on February 5, 2021 and December 22, 2021, with recommendations for minimization of impacts to wetlands, wetland mitigation, habitat restoration, and guidelines for trail design (Appendix C, pages 12-20).

All applicable recommendations are included in the Environmental Commitments section of this CE document.

## Terrestrial Habitat

<u>Presence</u>	<u>Impacts</u>	
	<u>YES</u>	<u>NO</u>
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Total terrestrial habitat in project area: 60.365 Acre(s) Total tree clearing: 13.5 Acre(s)

*Describe types of terrestrial habitat (i.e. forested, grassland, farmland, lawn, etc.) adjacent or within the project area. Include whether or not impacts will occur to habitat identified. Include total terrestrial habitat impacted and total tree clearing that will occur. Discuss measure to avoid, minimize, and mitigate if impacts will occur.*

Based on a desktop review, site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB, and the aerial map of the project area (Appendix B, pages 2-5), there are four types of habitats present: maintained lawn, vegetated right-of-way, agricultural land, and forested riparian habitat. The project will require a total of approximately 60.365 acres of habitat disturbance, of which 13.5 acres is tree clearing. Dominant vegetation consists of American elm (*Ulmus americana*), American sycamore (*Platanus occidentalis*), American hackberry (*Celtis occidentalis*), sugar maple (*Acer saccharum*), black locust (*Robinia pseudoacacia*), red mulberry (*Morus rubra*), white mulberry (*Morus alba*), Japanese honeysuckle (*Lonicera japonica*), bush honeysuckle (*Lonicera maackii*), *Acer saccharinum*), green ash (*Fraxinus pennsylvanica*), grey dogwood (*Cornus racemose*), tall goldenrod (*Solidago altissima*), red fescue (*Festuca rubra*), and Kentucky blue grass (*Poa pratensis*). Where practical, MSE walls have been used to minimize permanent right-of-way acquisition and habitat disturbance. Within the proposed right-of-way, avoidance or minimization alternatives are not practicable because of the construction of the added travel lanes, culs-de-sac, drainage improvements, and utility relocations will disturb the majority of the proposed right-of-way. Terrestrial habitat impacts will likely require mitigation through the Construction in a Floodway (CIF) permitting process and the City of Indianapolis Flora Permit process.

## Early Coordination

USFWS responded on January 27, 2021, with recommendations to avoid or minimize impacts to terrestrial habitat (Appendix C, pages 9-11). These recommendations included limiting tree clearing and understory vegetation to within the construction zone boundaries, as well as implementing temporary erosion and sediment control methods within areas of disturbed soil.

IDNR-DFW responded on February 5, 2021 and December 22, 2021, with recommendations to avoid or minimize impacts to terrestrial habitat (Appendix C, pages 11-20). These recommendations included post-construction revegetation measures, mitigation plans for riparian habitat impacts, and clearing restriction of any trees suitable for the Indiana bat or northern long-eared bat roosting during the active season. Additionally, IDNR-DFW had multiple recommendations regarding trail design and construction that would minimize impacts to terrestrial habitat, the first of which is to place the trail in the right-of-way. The planned multi-use path will parallel the roadway within the right-of-way and will not create additional impacts to terrestrial habitat such as habitat fragmentation.

The Marion County Soil and Water Conservation District responded on January 26, 2021, with a variety of recommendations regarding implementation of appropriate sediment and erosion control, drainage design, and tree protection (Appendix C, pages 33-37). The project is being designed in accordance with INDOT and DPW specifications which require appropriate sediment and erosion control, drainage design, and tree protection as part of their standard specifications. Additionally, the project will require a Construction Stormwater Sediment and Erosion Control Permit which the Marion County Soils and Water Conservation District will have the opportunity to review, and tree mitigation through the City of Indianapolis Flora permit.

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All applicable recommendations are included in the Environmental Commitments section of this CE document.

## Protected Species

### Federally Listed Bats

Information for Planning and Consultation (IPaC) determination key completed  
Section 7 informal consultation completed (IPaC cannot be completed)  
Section 7 formal consultation Biological Assessment (BA) required

Yes
X

No
X

Determination Received for Listed Bats from USFWS:

NE  NLAA  LAA

### Other Species not included in IPaC

Additional federal species found in project area (based on IPaC species list)  
State species (not bird) found in project area (based upon consultation with IDNR)

Yes
X

No
X

### Migratory Birds

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

Yes
X

No
X

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

Based on a desktop review and the RFI report (Appendix E, pages 1-17), completed by HNTB on May 25, 2021, the IDNR Marion and Johnson Counties Endangered, Threatened and Rare (ETR) Species Lists have been checked. According to the IDNR-DFW early coordination response letters dated February 5, 2021, and December 22, 2021 (Appendix C, pages 12-20), the Natural Heritage Program's Database has been checked and the federally endangered northern long-eared bat (*Myotis septentrionalis*) (NLEB) and the state endangered little brown bat (*Myotis lucifugus*) have been documented within 0.5 mile of the project area. IDNR-DFW's response stated, "To minimize impacts to the above bat species (and Indiana bat, which may also be present), do not cut any trees greater than 5 inches diameter at breast height (dbh), living or dead, from April 1 through September 30." No other species were noted in the IDNR-DFW response. An INDOT 0.5-mile bat review occurred on April 28, 2023. A review of the USFWS GIS database was conducted and identified known sites for threatened and endangered bats and that the project is within the range of maternity colonies.

Project information was submitted through the USFWS's Information for Planning and Consultation (IPaC) portal, and an official species list was generated (Appendix C, pages 74-90). The project is within range of the federally endangered Indiana bat (*Myotis sodalis*) and NLEB. Other species were generated in the IPaC species list along with the Indiana bat and NLEB. Refer to paragraph below.

The official species list generated from IPaC indicated three other species present within the project area. The tricolored bat (*Perimyotis subflavus*) is listed as "Proposed Endangered," the whooping crane (*Grus americana*) is listed as "Experimental Population, Non-Essential," and the monarch butterfly (*Danaus plexippus*) is listed as "Candidate." There are no statutory protections for these species, therefore no additional coordination is required at this time. No additional federally endangered or threatened species were generated in the IPaC species list other than the Indiana bat and NLEB. The project does not qualify for the most current INDOT/USFWS agreement because the project will impact more than 0.5 acre of forested right-of-way, some of which is more than 75 feet from the edge of the existing roadway. In addition, the project will impact greater than 300 linear feet of streams.

Based on tree removal/trimming within suitable habitat beyond 300 feet from the roadway, the project area being within a half mile of a documented capture site of listed bat species and within a five-mile maternity buffer for the Indiana bat, and percussives likely raising noise levels above background levels during construction, this project does not qualify for

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the Rangewide Programmatic Informal Consultation for the Indiana bat and NLEB. Bridge inspections occurred on October 26, 2021, and found no evidence of bats using the structures (Appendix C, pages 91-92). A standard coordination letter was prepared and submitted for INDOT review. INDOT reviewed the standard coordination letter and submitted to USFWS for review on June 20, 2023 (Appendix C, pages 61-73). On July 19, 2023, USFWS issued a concurrence letter with the "not likely to adversely affect" finding (Appendix C, pages 68-73). Avoidance and Minimization Measures (AMMS) and commitments provided in the USFWS concurrence letter included: General AMM 1, Lighting AMM 1, Lighting AMM 2, Tree Removal AMM 1, Tree Removal AMM 2, Tree Removal AMM 3, Tree Removal AMM 4, Structure AMM, and Bridge AMM. USFWS also included standard recommendations regarding revegetation of disturbed soils, clearing of trees outside of the construction zone boundaries, artificial bank stabilization, use of riprap, sediment runoff control, low-water work restrictions, culvert design recommendations, and wildlife crossings. AMMs and recommendations are included as commitments in the Environmental Commitments section of this document.

Nine structures will be removed as a result of the project. Prior to any demolition, the structure(s) will be inspected for bats or evidence of bats. If bats, or evidence of bats, are found, coordination will occur with INDOT ESD and USFWS before demolition may occur. If further coordination is needed, no demolition shall occur until coordination is concluded with INDOT ESD and USFWS. This firm commitment is included in the Environmental Commitments of this document.

Bridge inspections occurred on July 11, July 13, 2020, and October 26, 2021, and no bats or signs of bats were found using the structures (Appendix C, pages 91-92). INDOT BIAS inspections occurred on December 21, 2022 (Buffalo Creek) and December 28, 2022 (Pleasant Run Creek), which are included in Appendix I, pages 55-67 and 33-44, respectively and no bats were identified. USFWS Bridge/Structure Assessments are only valid for two years. Construction will begin after October 26, 2023, and therefore a new inspection shall be performed by a qualified individual and the inspection form shall be provided to INDOT Greenfield District Environmental Section prior to construction. Inspection of the structures should check for presence of bats/bat indicators and/or presence of birds. The results of the inspection must indicate no signs of bats or birds. If signs of bats or birds are documented during this inspection, the INDOT District Environmental Manager must be contacted immediately. This firm commitment is included in the Environmental Commitments of this document.

Structure No. 49-4503F carrying South County Line Road over Pleasant Run Creek and Structure No. 49-4510F carrying South County Line Road over Buffalo Creek and the project's surrounding habitat is conducive for use (i.e. nests) by a bird species protected under the Migratory Bird Treaty Act (MBTA). Prior to the start of nesting season (May 1), the structure must be inspected for birds or signs of birds. If birds or signs of birds are found during the inspection, avoidance and minimization measures must be implemented prior to the start of and during the nesting season. Nests without eggs or young should be removed prior to construction during the non-nesting season (September 8 – April 30) and during the nesting season if no eggs or young are present. Nests with eggs or young cannot be removed or disturbed during the nesting season (May 1 – September 7). Nests with eggs or young should be screened or buffered from active construction. Details of the required procedures are outlined in the "Potential Migratory Bird on Structure" unique special provision (USP)/recurring special provision (RSP).

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

### Geological and Mineral Resources

Project located within the Indiana Karst Region

Karst features identified within or adjacent to the project area

Oil/gas or exploration/abandoned wells identified in the project area

Yes


No

X
X
X

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

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

Based on a desktop review and the Indiana Karst Region map, the project is located outside the designated Indiana Karst Region as outlined in the most current *Protection of Karst Features during Project Development and Construction*. According to the topo map of the project area (Appendix B, page 6) and the RFI report (Appendix E, pages 1-17), there are no karst features identified within or adjacent to the project area. In the early coordination response June 25, 2021, the IGWS did not indicate that karst features exist in the project area (Appendix C, pages 25-26). The IGWS response indicated that there is high liquification potential and a floodway present. There is moderate potential for bedrock, high potential for sand and gravel resource, and abandoned industrial minerals sand gravel pits in the area. The features will not be affected because they are not located within the project's construction limits. Response from IGWS was communicated with the designer on August 24, 2023. No impacts are expected.

## **Early Coordination**

IDNR, Division of Oil and Gas, responded on November 23, 2021, stating "there are no known oil and gas related issues that will be encountered during this project" (Appendix C, page 58).

## **SECTION C – OTHER RESOURCES**

### **Drinking Water Resources**

Wellhead Protection Area(s)  
Source Water Protection Area(s)  
Water Well(s)  
Urbanized Area Boundary  
Public Water System(s)

### **Presence**

X
X
X
X

### **Impacts**

Yes
X
X
X
X

Is the project located in the St. Joseph Sole Source Aquifer (SSA):

If Yes, is the FHWA/EPA SSA MOU Applicable?  
If Yes, is a Groundwater Assessment Required?

Yes
X

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

### **Sole Source Aquifer (SSA)**

The project is located in Marion and Johnson Counties, which is not located within the area of the St. Joseph Sole Source Aquifer, the only legally designated sole source aquifer in the state of Indiana. Therefore, the FHWA/EPA Sole Source Aquifer Memorandum of Understanding (MOU) is not applicable to this project, a detailed groundwater assessment is not needed, and no impacts are expected.

### **Wellhead Protection Area and Source Water**

In an early coordination letter response dated February 5, 2021 and December 17, 2021, IDEM stated the project is located within a Wellhead Protection Area for Indianapolis, managed by Citizens Energy Group (CEG), and adjacent to a Wellhead Protection Area for Johnson County, managed by Indiana American Water. The project is not located in a Source Water Area (Appendix C, pages 41-45). CEG and Indiana American Water were sent early coordination letters on February 8, 2021, and November 22, 2021. CEG responded on February 8, 2021, and on November 23, 2021, stating, "We believe that impacts from the construction work to the source water protection area (wellhead protection area - South wellfield) could have significant impacts. These impacts can be minimized as long as construction activities adhere to local, state and federal regulations." Both responses included a list of requests regarding protection

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of surface water and the wellhead protection area, spill prevention plans, worker training, and spill response (Appendix C, pages 50-51). These recommendations are included as firm project commitments.

Indiana American Water responded to early coordination on January 13, 2021, and said, "This project is not within our Time of Travel (TOT) Zones. However, our TOT zones are downstream of water bodies within the project area. This means if a chemical were to leak or be spilled into a water body it could impact our source of supply." The response included a list of requests regarding chemicals that will be used during construction, storage of chemicals, inspections, and notification of spills or leaks (Appendix C, page 52). These recommendations are included as firm project commitments.

The features are not anticipated to be affected because all standard specifications and recommendations from this environmental document will be followed. Avoidance alternatives are not possible due to the location of the project within and adjacent to the wellhead protection areas.

### **Water Wells**

The IDNR Water Well Record Database website (<https://www.in.gov/dnr/water/3595.htm>) was accessed on May 10, 2023, by HNTB. Approximately 20 wells are mapped within or adjacent to the project area. Of those, three wells are associated with residential relocations for the I-69 interchange and two wells are associated with residential relocations for this project and will be closed in accordance with Indiana Code 25-39. The remainder of the residential wells are not anticipated to be impacted; however, exact well locations and impacts may not be determined until the right-of-way acquisition phase of the project. Avoidance alternatives are not practicable due to the construction of the added travel lanes and necessary drainage improvements; however, right-of-way acquisition has been minimized to the extent possible. Should it be determined during the right-of-way phase that these wells will be affected, a cost to cure will likely be included in the appraisal to restore the wells. Wells that cannot be avoided will be closed in accordance with Indiana Code 25-39.

### **Urban Area Boundary (UAB)**

Based on a desktop review of the Urban Area Boundary by HNTB on January 5, 2021, this project is located in an UAB. An early coordination letter was sent on January 8, 2021 and November 22, 2021, to the Greenwood Stormwater Department and the Indianapolis MS4 Coordinator. The Indianapolis MS4 coordinator responded on January 25, 2021, with the following recommendations: "The project must comply with the City of Indianapolis Storm Water Design and Construction Manual, including Chapter 700 Stormwater Quality and Chapter 600 Erosion and Sediment Control. Projects within the 100-year floodplain must submit plan information to the Department of Business and Neighborhood Services for a Floodplain Development (FLD) permit. If this project is within a 100-year floodplain, please refer to design memo no. 2017.11 (<https://www.indy.gov/activity/indy-dpw-design-memos>). This project is in a wellhead protection area. Please include appropriate spill response in the contract documents. Include the Indianapolis DPW Hazmat Emergency response number in the contract documents (317) 327-1620" (Appendix C, pages 53-54). These recommendations are included as project commitments. No response was received from the Greenwood Stormwater Department. The project will require a Construction Stormwater Sediment and Erosion Control Permit which the Greenwood Stormwater Department will have the opportunity to review.

### **Public Water System**

Based on a desktop review, sites visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB, and the aerial map of the project area (Appendix B, pages 2-5), this project is located in Indianapolis and Greenwood, where there are public water systems. The public water systems will likely be affected because of the required excavation in the area of the water utility lines. Early coordination letters were sent on February 8, 2021, and November 22, 2021, to CEG and Indiana American Water. CEG responded on February 8, 2021, and November 23, 2021 (Appendix C, pages 50-51). Indiana American Water responded on January 13, 2021 (Appendix C, page 52). No specific comments regarding public water systems were included in the early coordination responses. Utility coordination for the project is ongoing and impacts will be minimized to the extent possible. Avoidance alternatives are not possible due to the scope of the project.

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

If applicable, indicate the Floodplain Level?

Level 1       Level 2       Level 3       Level 4       Level 5

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

Based on a desktop review of The IDNR Indiana Floodway Information Portal website (<https://www.in.gov/dnr/water/surface-water/indiana-floodplain-mapping/indiana-floodplain-information-portal/>) by HNTB on May 10, 2023, and the RFI report, this project is located in a regulatory floodplain as determined from approved IDNR floodplain maps (Appendix F, pages 98-101).

Early coordination letters were sent on January 8, 2021, and November 22, 2021, to the Greenwood Stormwater Department, Indianapolis MS4 Coordinator, and IDNR. The Indianapolis MS4 coordinator responded on January 25, 2021, with the following recommendations: "The project must comply with the City of Indianapolis Storm Water Design and Construction Manual, including Chapter 700 Stormwater Quality and Chapter 600 Erosion and Sediment Control. Projects within the 100-year floodplain must submit plan information to the Department of Business and Neighborhood Services for a Floodplain Development (FLD) permit. If this project is within a 100-year floodplain, please refer to design memo no. 2017.11 (<https://www.indy.gov/activity/indy-dpw-design-memos>)" IDNR-DFW responded on February 5, 2021, and December 22, 2021, indicating the project will require the formal approval(s) for construction in a floodway pursuant to the Flood Control Act (IC 14-28-1) (Appendix C, pages 12-20). An early coordination letter was sent on May 10, 2023, to the City of Indianapolis and Johnson County Floodplain Administrators. The floodplain administrators did not respond within the 30-day time frame. Coordination with both the City of Indianapolis and Johnson County Floodplain Administrators, as well as the INDR Division of Water, regarding impacts to floodways and appropriate floodplain permitting will continue throughout design.

This project qualifies as a Category 4 project per the current INDOT CE Manual, which involves replacement of existing drainage structures on essentially the same alignment where no substantial impacts are predicted. County Line Road has a transverse crossing of Pleasant Run Creek, which will be replaced, and longitudinal encroachment along the north side of County Line Road between County Line Road and Morgantown Road. The crossing of Morgantown Road over Pleasant Run Creek is outside of the project limits and will not be impacted. There is one garage structure and one residential structure located within the base floodplain within 1,000 feet downstream of Morgantown Road and two residential structures and three associated garages or outbuildings located within the base floodplain within 1,000 feet upstream of County Line Road. As part of the project, one residential structure, garage, and outbuilding will be removed from the floodplain.

County Line Road has a transverse crossing of Buffalo Creek, which will be replaced. There is one shed located within the base floodplain within 1,000 feet downstream of County Line Road and no structures located within the base floodplain within 1,000 feet upstream of County Line Road. The crossing of Peterman Road (Railroad Road) over Buffalo Creek south of County Line Road is outside of the project limits and will not be impacted.

The proposed bridge structures will have an effective capacity such that backwater surface elevations are not expected to substantially increase. As a result, there will be no substantial adverse impacts on natural and beneficial floodplain values; there will be no substantial change in flood risks; and there will be no substantial increase in potential for interruption or termination of emergency service or emergency evacuation routes; therefore, it has been determined that this encroachment is not substantial. A hydraulic design study that addresses various structure size alternatives

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has been completed during the preliminary design phase. A summary of this study will be included with the Field Check Plans.

<b>Farmland</b>	<u>Presence</u>	<u>Impacts</u>	
	<u>Yes</u>	<u>No</u>	
Agricultural Lands	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Prime Farmland (per NRCS)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Total Points (from Section VII of CPA-106/AD-1006\*) 112

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

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

Based on a desktop review, site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB, and the aerial map of the project area (Appendix B, pages 2-5), the project will convert 5.377 acres of farmland as defined by the Farmland Protection Policy Act. An early coordination letter was sent on January 8, 2021, November 22, 2021, and August 7, 2023 to the NRCS. Coordination with NRCS resulted in a score of 112 on the AD 1006 Form (Appendix C, pages 46-49). The NRCS-CPA 106 indicated 5.38 acres of prime and unique farmland will be impacted, and the proposed project will acquire approximately 5.38 acres of active farmland. Additionally, the project will require temporary acquisition of 21.895 acres of active farmland for the borrow and/or disposal of soil. NRCS's threshold score for significant impacts to farmland that result in the consideration of alternatives is 160. Since this project score is less than the threshold, no significant loss of prime, unique, statewide, or local important farmland will result from this project. No alternatives other than those previously discussed in this document will be investigated without reevaluating impacts to prime farmland.

### SECTION D – CULTURAL RESOURCES

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

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

### **Area of Potential Effect (APE):**

The above-ground resources Area of Potential Effects (APE) extends from the west side of SR 37 in the west to the east side of SR 135 in the east. The width of the APE is generally one or two parcels deep, but extends farther at intersections where sight lines along the intersecting roads are deeper (Appendix D, pages 20-28). The archaeological APE is defined by a survey area encompassing approximately 70 acres that includes all of the existing and proposed right-of-way required for the undertaking.

### Coordination with Consulting Parties:

The State Historic Preservation Officer (SHPO) is entitled to participate in the Section 106 process as a consulting party. The following other individuals and organizations were invited by letter or email dated February 16 or 17, 2021, to be consulting parties (Appendix D, pages 123-137). Those parties who accepted the invitation are indicated below in bold print.

**Beth K. McCord, Deputy State Historic Preservation Officer**

Joseph O'Connor, Marion County Board of Commissioners  
Barbara Lawrence, Marion County Board of Commissioners  
Julie Voorhies, Marion County Board of Commissioners  
Anna Gremling, Indianapolis Metropolitan Planning Organization  
Sean Northup, Indianapolis Metropolitan Planning Organization  
Indianapolis Department of Metropolitan Development  
Dan Parker, Indianapolis DPW  
Elizabeth Nowak, Indianapolis Historic Preservation Commission  
Joe Hogsett, Mayor, City of Indianapolis  
Brian Baird, Johnson County Commissioner, District 1  
Kevin Walls, Johnson County Commissioner, District 2  
Ron West, Johnson County Commissioner, District 3  
James Ison, Johnson County Commissioner, District 4  
Mark Myers, Mayor, City of Greenwood  
Daniel Johnston, Greenwood Community Development Services  
Dale C. Davis, AICP, Greenwood Planning Director  
Dave Hittle, Johnson County Planning and Zoning  
Luke Mastin, Johnson County Highway Department  
Neil VanTrees, Johnson County Highway Department  
**Joshua Biggs, Indiana Landmarks, Central Regional Office**

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Chad Lethig, Indiana Landmarks, Central Regional Office  
Steven Barnett, Marion County Historian  
Carol A. Hall, President, Marion County Historical Society  
Keith Brown, President, Perry Township-Southport Historical Society  
Max Fitzpatrick, Johnson County Historian  
David Pfeiffer, Director, Johnson County Historical Society and Museum  
**Eastern Shawnee Tribe of Oklahoma**  
**Miami Tribe of Oklahoma**  
**Peoria Tribe of Indians of Oklahoma**  
Pokagon Band of Potawatomi Indians  
Shawnee Tribe  
Delaware Tribe of Indians, Oklahoma

The early coordination letter was distributed to potential consulting parties on February 16 or 17, 2021. By letter and email dated February 16, 2021, Indiana Landmarks accepted consulting party status (Appendix D, pages 138-139). SHPO responded by letter dated February 25, 2021, and requested to be notified of those who accepted consulting party status with the next correspondence (Appendix D, pages 140-141). The Miami Tribe of Oklahoma responded by letter dated March 18, 2021, and accepted consulting party status (Appendix D, page 142).

A letter dated June 3, 2021, and distributed on June 4, 2021, notified consulting parties that a historic property report (HPR) and an archaeology report (tribes only) were available for review and comment (Appendix D, pages 143-148). In its response to the HPR dated July 6, 2021 (revised July 15, 2021) (Appendix D, pages 149-154), the SHPO stated that five subdivisions located within the APE for this project were eligible for the NRHP, as listed below:

- Richards and Landers Mount Pleasant Subdivision
- Wood Creek Estates
- Carefree Subdivision
- Ridge Hill Trails
- Royal Meadows/Hill Valley Estates

With regard to archaeological resources, in its July 6, 2021 (revised July 15, 2021), response (Appendix D, pages 149-154), SHPO stated its concurrence "with the opinion of the archaeologist, as expressed in the submitted archaeological reconnaissance survey report (Crider/Terheide 5/27/2021), that the newly identified sites 12Ma1075, 12Ma1076, 12Jo736, and 12Jo737 do not appear eligible for inclusion in the NRHP and no further archaeological investigations are necessary." The letter went on to state that, "There is insufficient information to determine whether or not newly identified archaeological sites 12Ma1077 and 12Ma1078 are eligible for inclusion in the NRHP as the site boundaries extend beyond the limits surveyed." SHPO requested that the "surveyed limits should be clearly marked so that unsurveyed portions of these sites are avoided by all ground-disturbing project activities. If avoidance is not feasible, a plan for further archaeological investigations and evaluation of sites 12Ma1077 and 12Ma1078 must be submitted to the Indiana SHPO for review and comment prior to further field investigations." Sites 12Ma1077 and 12Ma1078 will be labeled on the plans as "Environmentally Sensitive Areas" and shall not be disturbed. This is included as a firm project commitment.

By letter dated August 3, 2021, the Eastern Shawnee Tribe of Oklahoma stated, in part, that "the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned" (Appendix D, page 155).

By letter dated November 23, 2021, the Addendum to the HPR was distributed to consulting parties. INDOT CRO explained that the purpose of the addendum was to provide SHPO with additional information regarding the five subdivisions (Richards and Landers Mount Pleasant Subdivision; Wood Creek Estates; Carefree Subdivision; Ridge Hill Trails; and Hill Valley Estates) that SHPO had previously indicated were eligible for the NRHP and requested that SHPO reconsider the eligibility of the five subdivisions (Appendix D, pages 156-160).

A letter dated December 20, 2021, was distributed by emails dated December 21, 2021, advising consulting parties

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(tribes only) that the Addendum to the Phase Ia archaeological report was available (Appendix D, pages 161-165). In its response to the Addendum to the HPR dated December 21, 2021 (Appendix D, pages 166-169), SHPO reiterated its recommendation that the five subdivisions (Richards and Landers Mount Pleasant Subdivision; Wood Creek Estates; Carefree Subdivision; Ridge Hill Trails; and Hill Valley Estates) "within the project's area of potential effects are eligible for inclusion in the NRHP."

By letter dated December 28, 2021, the Eastern Shawnee of Oklahoma stated, in part, that "the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe" (Appendix D, page 170).

By letter dated December 29, 2021, the Peoria Tribe of Indians of Oklahoma stated, "The Peoria Tribe has no objection at this time to the proposed project" (Appendix D, page 171).

SHPO responded by letter dated January 10, 2022 (Appendix D, pages 172-173), stating that: "there is insufficient information to determine whether or not archaeological site 12Ma1082 is eligible for inclusion in the NRHP, as the site boundaries may extend beyond the limits surveyed. However, it appears that the portion of site 12Ma1082 within the project area is not eligible for inclusion in the NRHP. The surveyed limits should be clearly marked so that unsurveyed portions of the site are avoided by all ground-disturbing project activities. If avoidance is not feasible, a plan for further archaeological investigations and evaluation of site 12Ma1082 must be submitted to the Indiana SHPO for review and comment prior to further field investigations." SHPO went on to reiterate its comments regarding the previously recorded archaeological resources, that "the newly identified archaeological sites 12Ma1075, 12Ma1076, 12Jo736 and 12Jo737 do not appear eligible for inclusion in the NRHP and no further archaeological investigations are necessary. There is insufficient information to determine whether or not newly identified archaeological sites 12Ma1077 and 12Ma1078 are eligible for inclusion in the NRHP as the site boundaries extend beyond the limits surveyed." SHPO went on to state that 12Ma1077 and 12Ma1078 should be avoided by all ground-disturbing project activities, and that if avoidance is not feasible, a plan for further archaeological investigations of the two sites must be submitted to the Indiana SHPO for review and comment prior to further field investigations.

By letter dated January 12, 2022, the Eastern Shawnee Tribe of Oklahoma responded, stating that, "the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe" (Appendix D, page 174).

No other consulting party comments were received in regard to the addendum reports.

On February 9, 2022, INDOT-Cultural Resource Office (CRO) sent a letter to the Indiana Division of the FHWA with documentation regarding the eligibility for NRHP listing for the five residential subdivisions: 1) Richards and Landers Mount Pleasant Subdivision; 2) Wood Creek Estates; 3) Carefree Subdivision; 4) Ridge Hill Trails; and 5) Hill Valley Estates. The letter requested that, if appropriate, the information be forwarded to the FHWA Federal Preservation Officer for review. In that letter, INDOT-CRO agreed with the recommendation of eligibility for the Carefree Subdivision (Appendix D, pages 175-198).

By letter dated May 9, 2022, the Indiana Division of FHWA submitted a letter and documentation to the Keeper of the National Register of Historic Places requesting that it provide a "determination of eligibility for the inclusion of four residential subdivisions in Indianapolis, Indiana in the NRHP (Appendix D, pages 199-211). All of the subdivisions were built in the period following World War II and are referred to as post-World War II residential resources. The subdivisions are named 1) Richards and Landers Mount Pleasant Subdivision, 2) Wood Creek Estates, 3) Ridge Hill Trails, and 4) Hill Valley Estates."

Determination of Eligibility Notifications dated June 27, 2022, were received from the office of the Keeper of the National Register (Appendix D, pages 212-221). In summary, the Determinations of Eligibility for the four subdivisions pursuant to the Notifications are:

- Mount Pleasant Subdivision: Not Eligible
- Wood Creek Subdivision: Not Eligible
- Ridge Hill Trails: Not Eligible as submitted – should re-evaluate Plat 1
- Hill Valley Estates: Eligible property with modified boundaries; portion in APE not eligible

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By letter and email dated January 17, 2023, an Assessment of Effects report was distributed to the consulting parties (Appendix D, pages 222-229).

By letter dated February 14, 2022 [an error for 2023], the SHPO concurred that the following historic properties are located within the APE: Carefree Subdivision Historic District; Ridge Hill Trails, Plat 1 Historic District; and the John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002) (Appendix D, pages 230-231). The SHPO also concurred that the project as proposed will not adversely affect the historic properties. The SHPO repeated its previous comments regarding the archaeological resources, namely that there is insufficient information to determine whether or not sites 12Ma1077, 12Ma1078, and 12Ma1082 are eligible for the NRHP as their site boundaries extend beyond the limits surveyed. The SHPO asked that the surveyed limits be clearly marked so that the unsurveyed portions of these sites are avoided by all ground-disturbing activities.

### **Archaeology:**

The results of the field surveys were reported in a Phase Ia Archaeological Records Check and Reconnaissance Survey Report, dated May 27, 2021 (Crider and Terheide 2021) (Appendix D, pages 238-240); an Addendum to the Phase Ia report, dated November 12, 2021 (Appendix D, pages 241-243); and a Second Addendum to the Phase Ia Archaeological Records Check and Reconnaissance Survey Report, dated August 3, 2023 (Appendix D, pages 247-249). The principal investigators for these reports meet the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61.

The archaeology survey identified six new sites: three prehistoric lithic scatters (12-Ma-1075, 12-Ma-1077, and 12-Jo-0736), one prehistoric lithic scatter with a historic component (12-Ma-1078), one historic artifact scatter (12-Jo-0737), and one prehistoric isolated find (12-Ma-1076). Sites 12-Ma-1075, 12-Ma-1076, 12-Jo-0736, and 12-Jo-0737 were recommended as not eligible for the NRHP or Indiana Register of Historic Sites and Structures (IRHSS). Sites 12-Ma-1077 and 12-Ma-1078 may extend north beyond current survey area boundaries. The portions of both of these sites located within the current survey corridor area would not contribute to the eligibility of the site for inclusion on the NRHP or the IRHSS. No further assessment was recommended for the portion of the sites 12-Ma-1077 and 12-Ma-1078 within the current survey boundary.

An Addendum to the Phase Ia Archaeological Records Check and Reconnaissance Survey Report dated November 12, 2021, (Terheide 2021) was prepared to address archaeology resources within an area that was added to the project footprint. This addendum report identified one additional archaeological site, but recommended new site 12-Ma-1082 as not eligible for the NRHP (Appendix D, pages 241-243).

A Second Addendum to the Phase Ia Archaeological Records Check and Reconnaissance Survey Report dated August 3, 2023, (Crider 2023) was prepared to address archaeology resources within areas that were added to the project footprint. This archaeological survey did not identify any sites. This report has been provided to SHPO and the Tribes for review and comment on October 13, 2023 (Appendix D, pages 247-249). SHPO concurred with the findings of this report on October 26, 2023 (Appendix D, pages 253-254). No other comments were received.

### **Historic Properties:**

Efforts to identify historic properties in the APE included a check of data available online at the Indiana State Historic Architectural and Archaeological Research Database (SHAARD); the Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBC Map); a review of the Johnson County Interim Report (1985); a review of the Marion County: Decatur, Perry, and Franklin Townships Interim Report (1992); historical/architectural and archaeological fieldwork; and communication with consulting parties. Sources of information examined included NRHP listings, IRHSS listings, the Indiana Historic Bridge Inventory, archaeological site maps, cultural resources management reports, and cemetery records. There are no NRHP- or IRHSS-listed properties within the APE. No historic bridges, cemeteries, or previously recorded archaeological sites are located within the APE. No properties in the APE have been recorded in the Indiana Historic Sites and Structures Inventory.

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The results of the field surveys were reported in an HPR, dated April 13, 2021 [Konicki and Terpstra 2021] (Appendix D, pages 233-234) and an Addendum to HPR, dated November 23, 2021 [Konicki, Terheide, Hillard, and Terpstra 2021] (Appendix D, pages 235-237). The principal investigators for these reports meet the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61. As a result of the consultative process, it was determined the following properties are eligible for listing in the NRHP:

### *Carefree Subdivision Historic District*

The Carefree Subdivision Historic District was determined eligible under Criteria A and C under Community Planning and Development and Architecture. It is a Custom Development, as defined in the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form. The Carefree Subdivision is composed of approximately 700 houses, including a variety of period architecture types and styles, curving streets and culs-de-sac, a clubhouse and pool, with a public school abutting the plat. It is located along a major roadway with easy access to churches and commercial buildings. The northernmost edge of the Carefree Subdivision along South County Line Road is included within the APE for this project. (Please note that the Carefree Subdivision north of Fairview Road is also called Carefree North.)

### *Ridge Hill Trails, Plat 1 Historic District*

The Ridge Hill Trails, Plat 1 Historic District was determined eligible under Criterion C under Architecture. It is a Custom Development subdivision, as defined in the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form, with a curvilinear plan with a variety of styles and types of houses. The Ridge Hill Trails, Plat 1 is located along a major roadway with easy access to churches and commercial buildings. The southernmost edge of the Ridge Hill Trails, Plat 1 along South County Line Road is included within the APE for this project.

### John Sutton House, 988 North (N.) Bluff Road (IHSSI #081-392-10002)

The John Sutton House at 988 N. Bluff Road (IHSSI #081-392-10002) is an Italianate style house that was constructed ca. 1875. It was determined eligible for the NRHP under Criterion C as an excellent example of the Italianate style in White River Township, Johnson County, Indiana.

### **Documentation Findings:**

#### Carefree Subdivision Historic District: No Adverse Effect (Appendix D, pages 11-13)

It is anticipated that 0.402 acre of permanent and 0.225 acre of temporary right-of-way will be acquired for the portion of the project within the Carefree Subdivision Historic District. Trees will be removed, a retaining wall will be built in front of the clubhouse, and the adjacent bridge carrying County Line Road over Buffalo Creek will be replaced. The undertaking will have No Adverse Effect on the Carefree Subdivision Historic District.

#### Ridge Hill Trails, Plat 1 Historic District: No Adverse Effect (Appendix D, pages 13-14)

It is anticipated that 0.509 acre of permanent and 0.168 acre of temporary right-of-way will be acquired for the portion of the project within the Ridge Hill Trails, Plat 1 Historic District. A detention basin is planned on the south side of County Line Road just to the west of the historic district. A number of mature trees along County Line Road will be removed as part of the project. Property owners will be offered the opportunity to have new trees planted beyond the new right-of-way to offset the loss of the existing trees in both the Ridge Hill Trails Section 1 Subdivision and the Carefree Subdivision in order to mitigate impacts of the loss of trees. Additionally, the existing Ridge Hill Trails signs located on either side of Ridge Hill Drive at County Line Road will be relocated out of the construction limits to a location comparable in relation to each roadway as the existing signs in order to maintain the integrity of the entrance to the subdivision. Both these are firm commitments. The undertaking will have No Adverse Effect on the Ridge Hill Trails, Plat 1 Historic District.

#### John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002): No Adverse Effect (Appendix D, pages 14-15)

The undertaking will not directly impact the John Sutton House. A connector road is proposed that will connect Mount Pleasant South Street with Bluff Road opposite the John Sutton House. No right-of-way will be acquired from the John Sutton House. The undertaking will have No Adverse Effect on the John Sutton House.

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INDOT, acting on FHWA's behalf, has determined a "No Adverse Effect" finding is appropriate for this undertaking.

## Public Involvement:

To meet the public involvement requirements of Section 106, a legal notice of FHWA's finding of "No Adverse Effect" was published in *The Indianapolis Star* on October 19, 2023, offering the public an opportunity to submit comments pursuant to 36 CFR 800.2(d), 800.3(e), and 800.6(a)(4). The public comment period closed 30 days later on November 18, 2023. The text of the public notice and the affidavit of publication are in Appendix D, pages 250-252. No comments were received. SHPO concurred with the APE and Finding of No Adverse Effect on October 26, 2023 (Appendix D, pages 253-254).

This completes the Section 106 process and the responsibilities of the FHWA under Section 106 have been fulfilled.

## **SECTION E – SECTION 4(f) RESOURCES/ SECTION 6(f) RESOURCES**

*Discuss Programmatic Section 4(f) and “de minimis” Section 4(f) impacts in the discussion below. Individual Section 4(f) documentation must be included in the appendix and summarized below. Discuss proposed alternatives that satisfy the requirements of Section 4(f). FHWA has identified various exceptions to the requirement for Section 4(f) approval. Refer to 23 CFR § 774.13 - Exceptions.*

Section 4(f) of the U.S. Department of Transportation Act of 1966 prohibits the use of certain public and historic lands for federally funded transportation facilities unless there is no feasible and prudent alternative. The law applies to significant publicly owned parks, recreation areas, wildlife / waterfowl refuges, and NRHP eligible or listed historic properties regardless of ownership. Lands subject to this law are considered Section 4(f) resources.

Based on a desktop review, the aerial map of the project area (Appendix B, pages 2-5), and the RFI report (Appendix E, pages 1-17), there are five potential 4(f) resources located within the 0.5-mile search radius. According to additional research, the Section 106 process, and by site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB, there are four potential 4(f) resources located within or adjacent to the project area. The Carefree Club is a private not-for-profit organization which oversees a pool, clubhouse, tennis and basketball courts and a playground area. This is not a recreational 4(f) resource because it is not a publicly-owned recreational facility that is open to the public. The Carefree Subdivision Historic District; Ridge Hill Trails, Plat 1 Historic District; and the John Sutton House

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are potential 4(f) resources that were identified through the Section 106 process.

The Carefree Subdivision Historic District – This undertaking will convert property from Carefree Subdivision Historic District, a Section 4(f) historic property, to a transportation use. INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect"; therefore, FHWA hereby intends to issue a "de minimis" finding for the Carefree Subdivision Historic District, pursuant to SAFETEA-LU, thereby satisfying FHWA's responsibilities under Section 4(f) for this historic property.

Ridge Hill Trails, Plat 1 Historic District – This undertaking will convert property from Ridge Hill Trails, Plat 1 Historic District, a Section 4(f) historic property, to a transportation use. INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect"; therefore, FHWA hereby intends to issue a "de minimis" finding for the Ridge Hill Trails, Plat 1 Historic District, pursuant to SAFETEA-LU, thereby satisfying FHWA's responsibilities under Section 4(f) for this historic property.

John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002) – This undertaking will not convert property from the John Sutton House, a Section 4(f) historic property, to a transportation use. INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect"; therefore, no Section 4(f) evaluation is required for the John Sutton House.

Per the Memorandum of Understanding between FHWA, SHPO, and INDOT, dated June 8, 2020, a "No Adverse Effect" finding serves as the required concurrence from the Official with Jurisdiction for a "de minimis" 4(f) determination for an historic 4(f) resource.

### Section 6(f) Involvement

#### Section 6(f) Property

#### Presence

#### Use

Yes

No




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

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

A review of 6(f) properties on the INDOT ESD website revealed a total of three grants in Johnson County and 24 properties in Marion County (Appendix I, page 1). None of these properties are located within or adjacent to the project area. Therefore, there will be no impacts to 6(f) resources.

## SECTION F – Air Quality

### STIP/TIP and Conformity Status of the Project

Is the project in the most current STIP/TIP?

Is the project located in an MPO Area?

Is the project in an air quality non-attainment or maintenance area?

If Yes, then:

Is the project in the most current MPO TIP?

Is the project exempt from conformity?

If No, then:

Is the project in the Transportation Plan (TP)?

Is a hot spot analysis required (CO/PM)?

Yes

X

X

X

X

X

No

X

X

Location in STIP:

Fiscal Year (FY) 2024-2028 STIP, Initial

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Name of MPO (if applicable): IMPO

Location in TIP (if applicable): FY 2024-2027 IRTIP, Initial

Level of MSAT Analysis required?

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

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

This project is included in the FY 2024-2027 IMPO Indianapolis Regional Transportation Improvement Program (IRTIP), which has been directly incorporated into the FY 2024-2028 State Transportation Improvement Program (STIP) (Appendix H, pages 1-2).

This project is located in Johnson and Marion Counties, which, according to IDEM's Nonattainment Status of Counties list ([https://www.in.gov/idem/sips/files/nonattainment\\_county\\_list.pdf](https://www.in.gov/idem/sips/files/nonattainment_county_list.pdf)) and the EPA Green Book ([https://www3.epa.gov/airquality/greenbook/anayo\\_in.html](https://www3.epa.gov/airquality/greenbook/anayo_in.html)), are currently maintenance areas for ozone, under the 1977 Ozone 8-hour standard, which was revoked in 2015 but is being evaluated for conformity due to the February 16, 2018, South Coast Air Quality Management District V. EPA, Et. Al. Decision. The project's design concept and scope are accurately reflected in both the IMPO Metropolitan Transportation Plan (<https://www.indympo.org/planning/mtp>) and the Transportation Improvement Program (TIP), and both conform to the State Implementation Plan (SIP). Therefore, the conformity requirements of 40 CFR 93 have been met.

A small portion of Marion County within downtown Indianapolis is under a limited maintenance plan for carbon monoxide (CO). However, the project area is located several miles from the maintenance area and is therefore in attainment for CO.

The purpose of this project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor by constructing added travel lanes on South County Line Road. This project has been determined to generate minimal air quality impacts for Clean Air Act criteria pollutants and has not been linked with any special mobile source air toxic (MSAT) concerns. As such, this project will not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause a meaningful increase in MSAT impacts of the project from that of the no-build alternative.

Moreover, Environmental Protection Agency (EPA) regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades. Based on regulations now in effect, an analysis of national trends with EPA's MOVES3 model forecasts a combined reduction of over 76 percent in the total annual emissions rate for the priority MSAT from 2020 to 2060 while vehicle-miles of travel are projected to increase by 31 percent (Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents, Federal Highway Administration, January 18, 2023). This will both reduce the background level of MSAT as well as the possibility of even minor MSAT emissions from this project.

A Greenhouse Gas (GHG) analysis was completed for this project. This analysis compares the build and no-build alternatives for the County Line Road project. The primary emissions sources are from vehicular traffic and from infrastructure (construction and operations and maintenance) sources. While construction is anticipated to cause increased GHGs in 2024, the following years expect less emissions in the build scenario than the no-build due to a relative decrease in network-wide vehicles miles traveled (VMT). Ultimately, the build alternative results in nearly 50,000 less global warming potential (GWP) and social cost savings of \$3.77 million. For reference to the report see Appendix H, pages 6-37.

### SECTION G - NOISE

#### Noise

Yes  No

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

Date Noise Analysis was approved/technically sufficient by INDOT ESD: November 19, 2021

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

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This project is a Type I project. The *Traffic Noise Technical Report*, dated November 17, 2021 (Appendix J, pages 1-58), evaluated the potential noise impacts of the proposed improvements within the County Line Road Added Travel Lanes study area in conformance with corresponding Federal regulations and guidance, and the National Environmental Policy Act (NEPA). The noise analysis presents the existing and future acoustical environment along the project corridor.

Existing noise level measurements were conducted on November 5, 2020, at five representative sites in the project corridor. Sites were selected based on distribution throughout the project corridor. A 20-minute measurement was taken at each site. The measurements were made in accordance with FHWA and INDOT guidelines using a Larson Davis LXT integrating sound level analyzer meeting American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) Type 1 specifications. Traffic counts were taken concurrently with the noise measurements.

The latest version of the FHWA's Traffic Noise Model, TNM®2.51 (TNM), was used to model existing (2020) and design year (2045) worst hourly traffic noise levels within the County Line Road Added Travel Lanes project study area. Three hundred forty-three (343) noise receivers representing 509 receptors were modeled in the Existing, No Build, and Build conditions. The study area includes receivers located within 500 feet from the roadway. Receivers consist of residences, a church, two noise-sensitive commercial land uses, and an assisted living facility, as well as non-sensitive commercial land uses.

Existing exterior peak hour (2020) noise levels range from 45.7 to 64.6 dBA Leq(1h). Residential noise levels ranged from 45.7 to 64.6 dBA Leq(1h). No noise sensitive receptors are anticipated to be impacted by approaching or exceeding the Noise Abatement Criteria (NAC) as a result of the proposed project. The exterior noise levels under the Build Alternative would range from 50.8 to 67.1 dBA Leq(1h). Noise levels at residential receivers would range from 50.8 to 65.9 dBA Leq(1h).

The change in predicted future noise levels over existing noise levels ranged from 2.2 to 6.7 dBA. Therefore, none of the predicted future noise levels would substantially exceed existing noise levels. No impacts were identified in the study area; therefore, noise abatement was not evaluated.

This noise analysis was based on preliminary design criteria (Appendix J, page 11). A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed and noise impacts are identified, noise abatement will be evaluated at that time as to whether it is feasible and reasonable.

### SECTION H – COMMUNITY IMPACTS

#### Regional, Community & Neighborhood Factors

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

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

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

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

Does the community have an approved transition plan?

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

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

Yes	No
X	
	X
	X
	X
X	
X	

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

The proposed project will require acquisition of 22.815 acres of new permanent right-of-way from residential, agricultural, and wooded lands. The right-of-way acquisition is not anticipated to have a substantial impact on the tax base or property values. The project will not result in substantial impacts to community cohesion. There will be nine

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relocations, and the project will not divide existing neighborhoods. There may be temporary inconveniences associated with construction, such as increased travel times, construction, noise, and fugitive dust. However, these will cease upon completion of construction activities.

Because of the proximity to the hill approaching Morgantown Road, construction of the project will require changes in access at the intersection of South County Line Road and Mount Pleasant East Street and the eastern intersection with Morris Road and South County Line Road. The proposed project will change these two intersections to culs-de-sac. These changes are necessary due to the lowering of the roadway in order to meet vertical sight distance standards and improve safety. The impacts to Morris Road will be minor. This street is currently approximately 1,500-feet-long and provides access to 15 homes. After converting the eastern intersection of Morris Road to a cul-de-sac, approximately 630 feet west of the Morgantown Road intersection, residents will still have full access to the western intersection of Morris Road with South County Line Road.

Access changes to the Mount Pleasant community located on the south side of South County Line Road will require closure of the intersection of South County Line Road with Mount Pleasant East Street, approximately 380 feet west of the Morgantown Road intersection. Approximately 110 homes are located on Mount Pleasant North Street, Mount Pleasant Center Street, Mount Pleasant South Street, Mount Pleasant West Street, and Mount Pleasant East Street and the neighborhood currently has three access points: Mount Pleasant West Street at South County Line Road, Mount Pleasant East Street at South County Line Road, and Mount Pleasant Center Street at Morgantown Road. Although outside of this South County Line Road project's limits, the intersection of Mount Pleasant West Road and South County Line Road is located approximately 365 feet east of State Road 37 and will be removed as part of the I-69 interchange. The current intersection will be converted to a T-road with no access to South County Line Road or Bluff Road. Therefore, the reasonably foreseeable cumulative impact to the neighborhood will be a reduction of the number of access points to the neighborhood from three to one. In order to mitigate this impact, a new entrance to the Mount Pleasant neighborhood will be constructed extending Mount Pleasant South Street to North Bluff Road.

According to the Fairs and Festivals website ([www.fairsandfestivals.net](http://www.fairsandfestivals.net)) and the Indiana Festivals website (<https://www.indianafestivals.org/>), accessed on July 16, 2021 by HNTB, there are multiple regularly scheduled festivals and reoccurring events located within Indianapolis and Greenwood, including craft/art fairs, farmers markets, and holiday festivals. The Marion County Fair (June), the Indiana State Fair (August), and the Indianapolis 500 (May) are some of the larger events that are held. Detours will be clearly marked and should not substantially impair travel routes to these fairs and festivals as they will last less than one construction season in duration. Access to individual properties will be maintained, but typical delays in construction zones with reduced speeds and potential restrictions can be expected during construction of the project. It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access.

According to the City of Indianapolis DPW Design Memorandum No. 2019.03, the City of Indianapolis' most recent Americans with Disabilities Act (ADA) Implementation/Transition Plan was developed and considered effective in 2013. An annual report demonstrating continued implementation of accessibility enhancements was prepared by the City of Indianapolis on December 28, 2018 (<https://citybase-cms-prod.s3.amazonaws.com/dc7a91fc142c4e6dae748df07781c7d2.pdf>). The City of Greenwood developed and adopted their ADA Transition Plan in 2013 ([https://www.greenwood.in.gov/egov/documents/1493645572\\_42316.pdf](https://www.greenwood.in.gov/egov/documents/1493645572_42316.pdf)) and developed an updated plan in 2020 ([https://www.greenwood.in.gov/egov/documents/1591128646\\_46259.pdf](https://www.greenwood.in.gov/egov/documents/1591128646_46259.pdf)).

Additionally, the project will develop extensive pedestrian and bicycle accessible facilities along the entire length of the project area, including sidewalks and a multi-use trail, along the north and south sides of South County Line Road, which will all be newly implemented and tied into the existing facilities in accordance with the City of Indianapolis, City of Greenwood, and state and federal ADA requirements.

### Public Facilities and Services

*Discuss what public facilities and services are present in the project area and impacts (such as MOT) that will occur to them. Include how the impacts have been minimized and what coordination has occurred. Some examples of public facilities and services include*

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*health facilities, educational facilities, public and private utilities, emergency services, religious institutions, airports, transportation or public pedestrian and bicycle facilities.*

Based on a desktop review, the aerial map of the project area (Appendix B, pages 2-5) and the RFI report (Appendix E, pages 1-17), there are four religious facilities, one cemetery, two recreational facilities, eight pipeline segments, and two railroad segments located within 0.5 mile of the project area. There are four privately owned but noted as public facilities (Grace Baptist Church, Carefree Club, Texas Eastern Transmission Corp pipeline, and Indiana Rail Road Company) within or adjacent to the project area. Of these, only Grace Baptist Church is actually open to the public. That number was confirmed by the site visits on October 7, 2020, July 2, 2021, December 2, 2022, and July 26, 2023, by HNTB. Access will be maintained to all properties.

Greenwood Municipal Airport is located approximately 3.8 miles east of the project area; therefore, early coordination with the INDOT Office of Aviation occurred (discussed below).

The anticipated project area falls along a dividing line for service areas for many utility companies. The north side of South County Line Road is primarily served by CEG for natural gas and water. The south side is served by CenterPoint Energy (formerly Vectren and Indiana Gas Co) for natural gas. (Please note that the RFI identified pipeline segments in the project area owned by Indiana Gas Co. Those pipelines are now owned by CenterPoint Energy. An Early Coordination Letter was sent to CenterPoint Energy on October 2, 2023.) Where properties on the south side of South County Line Road have water, they are served by Indiana American Water. There are two existing sanitary sewers within the western portion of the project, with CEG owning one coming in from the north side, and a private landowner owning one coming in from the south side. There are several additional sanitary sewer services and lines that will be placed and owned by CEG for the project to mitigate impacts to private septic systems. AES (formerly IP&L) Electric distribution lines exist predominantly on the north side of South County Line Road, except for stretches with electric on the south side between Mount Pleasant East Street and Pleasant Run Creek, along the west side of Morgantown Road, and in sections along both sides of Railroad Road. Along the project corridor, cable, telecom, and fiber lines are underbuilt on AES's electric poles. An electric transmission line runs along the east side of Railroad Road. Enterprise Products owns and maintains a Natural Gas Transmission pipeline crossing South County Line Road approximately 2,800 feet east of Railroad Road, which is approximately 150 feet east of Leisure Lane. Extensive adjustments are expected to be required in some fashion to every utility present within the corridor, with the possible exception of the Enterprise Products gas transmission line. Utility coordination is ongoing, and utility relocations are expected to take place throughout 2024 and into 2025.

Indiana Rail Road Company owns and maintains a rail line adjacent to Railroad Road and Peterman Road. This single-track rail line has an at-grade crossing (DOT crossing #292261E) with South County Line Road immediately west of the intersection with Railroad Road/Peterman Road. The crossing has overhead flashers but no crossing gates. The widening of South County Line Road will necessitate a reconstruction of the pavement surface at the grade crossing, the relocation (or replacement) of the existing gantry/flashing indicators, and installation of new automatic gates. Additionally, the crossing will include signal interconnectivity between vehicle traffic and railroad activity. This connectivity will ensure that intersection traffic signals turn red when a train is approaching.

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

### **Early Coordination**

INDOT Office of Aviation responded on January 11, 2021, and November 23, 2021, regarding the project's proximity to Greenwood Municipal Airport (Appendix C, pages 21-22). Both responses stated that they "found no issues with any surrounding airspace or public use airports. This is due to the project meeting the required glideslope criteria from the nearest public use facility according to 14 CFR Part 77 – Safe, efficient use, and preservation of the navigable airspace. If any object will exceed 200 feet in height, regardless of location, the object will need to be airspaced with the Federal Aviation Administration (FAA) 45 days prior to construction through the OEAAA portal: <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp>." (Appendix C, pages 21-22). This is a firm project commitment.

Johnson County Surveyor's Office responded on January 15, 2021, regarding cornerstone monumentation and

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excavation along the route. They requested assistance with cornerstone monumentation or excavation along the route (Appendix C, page 27). This is a firm project commitment.

Marion County Surveyor's Office responded on January 11, 2021, regarding monuments within the project area. Their response included tie sheets for the monuments (Appendix C, pages 28-32).

Center Grove Community School Corporation responded on February 4, 2021, indicating that they had no comments about the project (Appendix C, page 38).

IndyGo responded on February 5, 2021, and December 2, 2021, indicating that they do not currently operate any transit service within the project area, and the Marion County Transit Plan does not include plans to do so (Appendix C, pages 39-40).

Enterprise Products Company responded on January 12, 2021, indicating that utility coordination had already begun and would be ongoing (Appendix C, page 55-57).

Indiana Rail Road Company responded on May 26, 2021, requesting more details about the planned construction in the area of the railroad track crossing and intersection of South County Line Road with Railroad Avenue/Peterman Road. HNTB sent a follow-up email on May 26, 2021, providing additional project information (Appendix C, pages 59-60).

## Environmental Justice (EJ) (Presidential EO 12898)

During the development of the project were EJ issues identified?

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

Does the project require an EJ analysis?

If YES, then:

Are any EJ populations located within the project area?

<b>X</b>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

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

Under FHWA Order 6640.23A, FHWA and the project sponsor, as a recipient of funding from FHWA, are responsible to ensure that their programs, policies, and activities do not have a disproportionately high and adverse effect on minority or low-income populations. Per the current INDOT Categorical Exclusion Manual, an Environmental Justice (EJ) Analysis is required for any project that has two or more relocations or 0.5 acre of additional permanent right-of-way. The project will require acquisition of approximately 20 acres of permanent right-of-way and nine relocations. Therefore, an EJ Analysis is required.

Potential EJ impacts are detected by locating minority and low-income populations relative to a reference population to determine if populations of EJ concern exist and whether there could be disproportionately high and adverse impacts to them. The reference population may be a county, city or town and is called the community of comparison (COC). In this project, since the project is located in two counties, the COC is an aggregate of Perry Township in Marion County and White River Township in Johnson County. The community that overlaps the project area is called the affected community (AC) and is compared to census tract or block group information, depending on the availability of data. In this project, the affected communities are Block Groups 1 and 2 of Census Tract 6106.03, Block Group 2 of 6106.04, and Block Group 1 of 6106.06 in Johnson County; and Block Group 2 of Census Tract 3801 and Block Groups 3 and 4 of Census Tract 3812.01 in Marion County.

An AC has a population of concern for EJ if the population is more than 50% minority or low-income or if the low-income or minority population is 125% of the COC. Data from the 2019 American Community Survey was obtained from the US Census Bureau Website (<https://data.census.gov>) on August 20, 2021, by HNTB. The data collected for low-income and minority populations within the AC are summarized in the tables below.

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Low-Income Data (American Community Survey, 2019) – Block Groups									
	COC: White River Township Combined with Perry Township	Block Group 1, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.04, Johnson County	Block Group 1, Census Tract 6106.06, Johnson County	Block Group 2, Census Tract 3801, Marion County	Block Group 3, Census Tract 3812.01, Marion County	Block Group 4, Census Tract 3812.01, Marion County	
Percent Low-Income	<b>10.79%</b>	9.04%	0%	1.13%	0%	15.44%	5.71%	1.23%	
125% of COC	<b>13.48%</b>	AC < 125% COC	AC > 125% COC	AC < 125% COC	AC < 125% COC				
EJ Population of Concern		No	No	No	No	Yes	No	No	

Block Group 1 of Census Tract 6106.03 has a percent low-income of 9.04%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.03 does not contain low-income populations of EJ concern.

Block Group 2 of Census Tract 6106.03 has a percent low-income of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.03 does not contain low-income populations of EJ concern.

Block Group 2 of Census Tract 6106.04 has a percent low-income of 1.13%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.04 does not contain low-income populations of EJ concern.

Block Group 1 of Census Tract 6106.06 has a percent low-income of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.06 does not contain low-income populations of EJ concern.

Block Group 2 of Census Tract 3801 has a percent low-income of 15.44%, which is below 50% but is greater than the 125% COC threshold. Therefore, Block Group 2 of Census Tract 3801 does contain a low-income population of EJ concern.

Block Group 3 of Census Tract 3812.01 has a percent low-income of 5.71%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 3 of Census Tract 3812.01 does not contain low-income populations of EJ concern.

Block Group 4 Census Tract 3812.01 has a percent low-income of 1.23%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 4 of Census Tract 3812.01 does not contain low-income populations of EJ concern.

Minority Data (American Community Survey, 2019) – Block Groups									
	COC: White River Township Combined with Perry Township	Block Group 1, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.03, Johnson County	Block Group 2, Census Tract 6106.04, Johnson County	Block Group 1, Census Tract 6106.06, Johnson County	Block Group 2, Census Tract 3801, Marion County	Block Group 3, Census Tract 3812.01, Marion County	Block Group 4, Census Tract 3812.01, Marion County	
Percent Minority	<b>21.3%</b>	0%	0%	0%	6.5%	4.7%	8.9%	18.3%	

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125% of COC	<b>26.6%</b>	AC < 125% COC						
EJ Population of Concern		No						

Block Group 1 of Census Tract 6106.03 has a percent minority of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.03 does not contain minority populations of EJ concern.

Block Group 2 of Census Tract 6106.03 has a percent minority of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.03 does not contain minority populations of EJ concern.

Block Group 2 of Census Tract 6106.04 has a percent minority of zero, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 6106.04 does not contain minority populations of EJ concern.

Block Group 1 of Census Tract 6106.06 has a percent minority of 6.5%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 1 of Census Tract 6106.06 does not contain minority populations of EJ concern.

Block Group 2 of Census Tract 3801 has a percent minority of 4.7%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 2 of Census Tract 3801 does not contain minority populations of EJ concern.

Block Group 3 of Census Tract 3812.01 has a percent minority of 8.9%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 3 of Census Tract 3812.01 does not contain minority populations of EJ concern.

Block Group 4 Census Tract 3812.01 has a percent minority of 18.3%, which is below 50% and is below the 125% COC threshold. Therefore, Block Group 4 of Census Tract 3812.01 does not contain minority populations of EJ concern.

### Mobile Home Communities:

Winterbrook is a mobile home community located within the project area on the south side of South County Line Road in Johnson County, just west of Peterman Road / CR 400 West. This community includes three separate areas including Shady Brook Heights, Glendale Trailer Court, and the Shady Brook Heights loop. Although the census data does not indicate that there is an EJ population of concern present in the Block Groups containing this community, mobile home communities can often be low-income communities of EJ concern. Therefore, this portion of the project area is being considered an EJ community of concern for the purpose of this analysis. The mobile home community is located in Block Groups 1 and 2 of Census Tract 6106.03. The east entrance to the Winterbrook Community, on Shady Brook Heights loop, is being relocated by the project because it is currently too close to the South County Line Road and Railroad Road / Peterman Road / CR 400 West intersection and the Indiana Rail Road Company tracks. The entrance will be moved further west and will require the relocation of a community mailbox structure.

### Benefits and Burdens of the Project:

Once potential EJ communities are identified, the next step is to determine if they are expected to experience a disproportionately high and adverse impact from the project. The FHWA and United States Department of Transportation (USDOT) EJ Orders state that "disproportionately high and adverse" refers to an adverse effect that (1) is predominately borne by a minority population and/or a low-income population; or (2) will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

The proposed South County Line Road project includes added travel lanes, correction of a steep incline at the Morgantown Road intersection, replacement of two bridges, construction of a 10-foot, multi-use trail on the north side of South County Line Road, and construction of a 6-foot sidewalk on the south side of South County Line Road. In addition, the eastern intersection of Morris Road and South County Line Road and the intersection of Mount Pleasant East Street and South County Line Road will be permanently eliminated, and culs-de-sac will be constructed. A new

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entrance to the Mount Pleasant neighborhood will be constructed on the southwest corner of the neighborhood connecting to Mount Pleasant South Street to N. Bluff Road. Overall, the project will require approximately 20 acres of new permanent right-of-way and nine relocations. Relocations within block groups of EJ concerns are 22% of all the project relocations, and right-of-way acquisition within block groups of EJ concern is 30% of the permanent right-of-way and 48% of the temporary right-of-way.

The following benefits and burdens have been identified as potential considerations in determining whether the populations of EJ concern will experience disproportionately high and adverse impacts from the project.

### Benefits

- Reduced travel time and congestion – The area currently experiences congestion due to limited capacity of the two-lane roadway and the stop-controlled intersection of Railroad Road / Peterman Road / CR 400 West. Congestion is expected to increase after the new I-69 interchange with South County Line Road is constructed. The added capacity and mobility from the proposed South County Line Road project and the signalization of Railroad Road / Peterman Road / CR 400 West intersection will result in reduced travel times and congestion, which will benefit EJ and non-EJ populations similarly.
- Improved safety outcomes – The sight distance correction at the steep hill at the Morgantown Road intersection and the addition of the two-way, left-turn lane, will improve safety and reduce crashes throughout the project area. This increased safety will benefit EJ and non-EJ populations similarly.
- Increased recreational opportunity and pedestrian mobility - Construction of the multi-use trail will benefit pedestrians and cyclists from the project area and surrounding communities by providing recreational opportunities and safe access to the commercial amenities east of the project area, especially those without reliable vehicular transportation. This increased recreational opportunity and mobility will benefit EJ and non-EJ populations similarly.
- Residential relocations – Although residential property displacements are considered a burden of the project, it should be noted that early property acquisition of some of the parcels has occurred using 100% local funding. All of the residential relocations so far have involved willing sellers, and none have gone to condemnation. More specifically, the residents impacted by the two residential relocations, or 22% of all relocations for the project, that are located within the identified EJ community (Census Tract 3801 Block Group 2), have considered their relocations a benefit. Those residents have not been identified as members of an EJ population and have indicated to the project team that their new homes are improvements over their previous homes. The previous homes had driveways that were difficult to navigate because of traffic on South County Line Road and the proximity to the vertical curve at the Morgantown Road intersection. The project sponsor, the City of Indianapolis, has been committed to ensuring that the relocation process is fair and follows 49 CFR 24 of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

### Burdens

- Residential property displacements - The data for Census Tract 3801 Block Group 2 in Marion County indicates that it has a low-income EJ population. Census Track 3801 Block Group 2 extends from SR 37 east to Railroad Road and from South County Line Road north to Stop 11 Road and includes approximately 1,081 households. Two residential relocations out of the nine total in the project, or 22% of the relocations, are expected in the portion of the project area covered by this block group.

No other Block Groups were identified within the project limits as containing potential EJ populations. Seven residential relocations are expected within the project limits outside of the Block Group of EJ concern. No residential relocations are expected in the identified mobile home communities. Non-EJ communities will be impacted by more residential relocations than EJ communities. Therefore the potential EJ community is not being disproportionately impacted compared to the non-EJ community with regards to residential displacements.

- Right-of-way acquisition – In order to construct the project, strip right-of-way acquisition will be necessary throughout the project area. This right-of-way acquisition will impact the yards of homes directly adjacent to the project area. A total of approximately 6 acres of permanent right-of-way of the 20 acres total will be required

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from the identified EJ communities, or 30% of the permanent right-of-way. Non-EJ communities will be impacted by more right-of-way acquisition than EJ communities. Therefore the potential EJ community is not being disproportionately impacted compared to the non-EJ community with regards to right-of-way acquisition.

- Reduced access to the residential communities – Construction of the project will require changes in access at the intersection of South County Line Road and Mount Pleasant East Street and the eastern intersection of Morris Road and South County Line Road. The proposed project will change these two intersections to culs-de-sac. These changes are necessary due to the lowering of the roadway in order to meet vertical sight distance standards and improve safety.

The impacts to Morris Road will be minor. This street is 1,500 feet long and provides access to 15 homes. After converting the eastern intersection of Morris Road to a cul-de-sac, approximately 630 feet west of the Morgantown Road intersection, residents will still have full access to the western intersection of Morris Road with South County Line Road. Morris Road is located within the identified EJ community of Census Tract 3801 Block Group 2.

Access changes to the Mount Pleasant community located on the south side of South County Line Road will require closure of the intersection of South County Line Road with Mount Pleasant East Street, approximately 380 feet west of the Morgantown Road intersection. Approximately 110 homes are located on Mount Pleasant North Street, Mount Pleasant Center Street, Mount Pleasant South Street, Mount Pleasant West Street and Mount Pleasant East Street and the neighborhood currently has three access points: Mount Pleasant West Street at South County Line Road, Mount Pleasant East Street at South County Line Road, and Mount Pleasant Center Street at Morgantown Road. Although outside of this South County Line Road project's limits, the intersection of Mount Pleasant West Road and South County Line Road is located approximately 365 feet east of State Road 37 and will be removed as part of the I-69 interchange. The current intersection will be converted to a T-road with no access to South County Line Road or Bluff Road. Therefore, the reasonably foreseeable cumulative impact to the neighborhood will be a reduction of the number of access points to the neighborhood from three to one. As a measure to mitigate the impact of the reduction in access to the community, the project will construct an additional entrance on the southwest corner of the neighborhood that will connect to N. Bluff Road. The Mount Pleasant Community has not been identified as an EJ community. Based on changes to community access, the non-EJ community in the Mount Pleasant neighborhood and the Morris Road residents located within the identified EJ community in Census Tract 3801 will be impacted similarly by reduced access.

- Tree clearing necessary for construction – Due to the construction of the added travel lanes and improvements to drainage in the project area, approximately 10 acres of trees will be removed throughout the project area. EJ and non-EJ populations will be impacted similarly by the potentially negative impacts of reduced aesthetics and shade availability.
- Temporary inconveniences, dust, noise, etc. – During construction, temporary travel inconveniences, as well as increase in dust and noise will similarly impact EJ and non-EJ populations. These impacts will cease with completion of the project.
- MOT – During construction, the intersection of Morgantown Road and County Line Road will be closed, and County Line Road from the west intersection of Morris Road to Rocky Ridge Road will be closed for roadway and bridge construction. The detour for this closure will be approximately 3 miles. One potential detour will utilize Morgantown Road, Stop 11 Road, and Railroad Road which roughly form the boundaries of Census Track 3801, Block Group2 which has been identified as an Environmental Justice Community. Access to the I-69 and County Line Road interchange will be limited with the majority of traffic detoured to Bluff Road or north to the Southport Road interchange. During construction, temporary travel inconveniences caused by lane and road closures will similarly impact EJ and non-EJ populations. These impacts will cease with completion of the project.
- Air quality and noise impacts from increased roadway capacity – The additional capacity of the widened South County Line Road could potentially bring localized areas of decreased air quality and increased roadway noise. However, air quality may also be improved due to decreased vehicle idling time brought about by the reduction

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in congestion along the roadway. As discussed in the Noise section of this CE document, the change in predicted future noise levels over existing noise levels ranged from 2.2 to 6.7 dBA. Therefore, none of the predicted future noise levels would substantially exceed existing noise levels. Any possible changes in air quality or noise will impact EJ and non-EJ populations similarly.

### Conclusion:

Although this project will cause impacts to the community, those impacts have been reduced as much as possible by the project design, including retaining walls to reduce the right-of-way impacts of the project. In addition, those burdens will be experienced among both EJ and non-EJ populations, with more relocations and right-of-way acquisition from non-EJ communities. The positive impacts of the project will equally benefit EJ and non-EJ populations. Therefore, the identified populations of EJ concern are not expected to experience a disproportionately high and adverse impact from the project. EJ information and graphics can be found in Appendix I, pages 111-117.

### Relocation of People, Businesses or Farms

Will the proposed action result in the relocation of people, businesses or farms?  
Is a BIS or CSRS required?

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

Number of relocations: Residences: 9 Businesses: 0 Farms: 0 Other: 0

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

Nine residential relocations are required for the project. Graphics showing the relocations are included in Appendix I, pages 111-117. The alignment has been designed to reduce the number of residential relocations. The design team looked at different horizontal alignments for the Five-Lane Alternative to minimize impacts to surrounding homes. It was determined that widening the roadway equally on both sides was the best option in order to minimize impacts to properties and reduce relocations. Retaining walls are being used to limit right-of-way needs of the project by reducing the amount of space needed for grading. In addition, the 10-foot, multi-use trail is being built on only one side of the road in order to limit right-of-way needs.

The project is located at the edge of Marion and Johnson Counties within a highly developed residential area and abundant replacement housing is available. Property acquisition will be completed by the DPW for the City of Indianapolis in accordance with all state and federal requirements. INDOT determined on June 30, 2021, that a Conceptual Stage Relocation Study (CSRS) is not required for this project (Appendix I, page 2).

The acquisition and relocation program will be conducted in accordance with 49 CFR 24 of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended. Relocation resources are available to all residential and business relocatees without discrimination. No person displaced by this project will be required to move from a displaced dwelling unless comparable replacement housing is available to that person.

## SECTION I – HAZARDOUS MATERIALS & REGULATED SUBSTANCES

### Documentation

#### **Hazardous Materials & Regulated Substances** (Mark all that apply)

Red Flag Investigation (RFI)  
Phase I Environmental Site Assessment (Phase I ESA)  
Phase II Environmental Site Assessment (Phase II ESA)  
Design/Specifications for Remediation required?

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Date RFI concurrence by INDOT SAM (if applicable): May 27, 2021 and October 4, 2021

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

Based on a review of GIS data from the State of Indiana Geographical Information Office Library and available public records, the RFI was completed on May 25, 2021, by HNTB, and INDOT Site Assessment Management (SAM) provided concurrence on May 27, 2021 (Appendix E, pages 1-13). An RFI Addendum was completed by HNTB on October 1, 2021, to address changes that occurred within the project area. INDOT SAM provided concurrence to the addendum on October 4, 2021 (Appendix E, pages 14-17). One Voluntary Remediation Program site, two Leaking Underground Storage (LUST) sites, four Institutional Controls sites, and nine National Pollutant Discharge Elimination System (NPDES) facilities are located within 0.5 mile of the project area. One LUST and three NPDES facilities are located within or adjacent to the project area.

One LUST site, Speedway/Sm #6144 (936 West South County Line Road, AI ID # 13371), is located within the project area. The site has operated as a gas station since 1986. IDEM issued a No Further Action (NFA) letter on November 17, 2004. Low levels of Contaminants of Concern (COCs) were noted below remedial action levels on site outside of the anticipated area of acquisition. Due to the anticipated right-of-way acquisition on this site for the construction of the additional travel lanes, it is possible that petroleum contaminated soil or groundwater could be encountered. If encountered, proper removal, transport, and disposal of soil and/or groundwater may be necessary. This is a firm project commitment.

One NPDES Facility, the INDOT I-69 Section 6 Demolition project (Des. 1901802), is located within the project area. The project was issued permit INRA04593 for construction stormwater authorization on November 26, 2019. The permit is in effect until November 25, 2024. An Early Coordination Letter was sent to the INDOT I-69 Section 6 Project Manager on January 8, 2021 and on November 22, 2021, and no response was received. Therefore, no impacts are expected.

One NPDES Facility, SecurCare Self-Storage (920 West South County Line Building Addition), is located adjacent to the project area. The facility was issued permit INR10L289 on January 24, 2015 for construction stormwater authorization. The permit is in effect until December 22, 2020. An Early Coordination Letter was sent to SecurCare Self-Storage on January 8, 2021 and November 22, 2021, and no response was received. Therefore, no impacts are expected.

One NPDES Facility, Pleasant Valley Subdivision Section 1, is located adjacent to the project area. The facility was issued permit INR10P696 on September 21, 2017 and permit INRA04249 on April 9, 2019 for construction stormwater authorization. The INR10P696 permit is in effect until September 20, 2022, and INRA04249 permit is effective until on April 8, 2024. This permit was terminated on March 7, 2023. Therefore, no impacts are expected.

Buffalo Creek and Pleasant Run Creek are listed as impaired for both *E. coli* and IBCs. Workers who are working in or near water with *E. coli* should take care to wear appropriate personal protective equipment (PPE), observe proper hygiene procedures, including regular hand washing, and limit personal exposure. Concerning IBCs, Best Management Practices (BMPs) will be used to avoid further degradation to the streams for both Buffalo Creek and Pleasant Run Creek. This is a firm commitment.

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### Part IV – Permits and Commitments

#### **PERMITS CHECKLIST**

**Permits** (mark all that apply)

**Likely Required**

**Army Corps of Engineers (404/Section10 Permit)**

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

X

**IN Department of Environmental Management  
(401/Rule 5)**

- Nationwide Permit (NWP)
- Regional General Permit (RGP)
- Individual Permit (IP)
- Isolated Wetlands
- Construction Stormwater General Permit (CSGP)
- Other

X
X

**IN Department of Natural Resources**

- Construction in a Floodway
- Navigable Waterway Permit
- Other

X
X
X

**Mitigation Required**

- US Coast Guard Section 9 Bridge Permit**  
**Others (Please discuss in the discussion below)**

X
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*List the permits likely required for the project and summarize why the permits are needed, including permits designated as “Other.”*

A City of Indianapolis Flora permit will be required for tree removal within the existing and proposed right-of-way.

IDNR CIF Permits will be required for the replacement of the bridges over Pleasant Run and over Buffalo Creek.

USACE Section 404 Regional General Permit (RGP) or Nationwide Permit (NWP) and IDEM Section 401 Water Quality Certification will be required due to the anticipated temporary and permanent impacts to Pleasant Run Creek, Buffalo Creek, tributaries, and wetlands.

A Construction Stormwater General Permit (CSGP) will be required due to disturbance of more than one acre of land.

Mitigation for tree clearing will be required for both the City of Indianapolis Flora permit and the IDNR CIF. No stream or wetland mitigation will be required.

Applicable recommendations provided by resource agencies are included in the Environmental Commitments section of this document. If permits are found to be necessary, the conditions of the permit will be requirements of the project and will supersede these recommendations.

It is the responsibility of the project sponsor to identify and obtain all required permits.

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### ENVIRONMENTAL COMMITMENTS

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

**Firm:**

1. If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division (ESD) and the INDOT District Environmental Section will be contacted immediately. (INDOT ESD and INDOT Greenfield and Seymour Districts)
2. It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access. (INDOT ESD)
3. One LUST site, Speedway/Sm #6144 (936 West South County Line Road, AI ID # 13371), is located within the project area. The site has operated as a gas station since 1986. IDEM issued a No Further Action (NFA) letter on November 17, 2004. Low levels of Contaminants of Concern (COCs) were noted below remedial action levels on site outside of the anticipated area of acquisition. Due to the anticipated right-of-way acquisition on this site for the construction of the additional travel lanes, it is possible that petroleum contaminated soil or groundwater could be encountered. If encountered, proper removal, transport, and disposal of soil and/or groundwater may be necessary. (INDOT SAM)
4. If any object will exceed 200 feet in height, regardless of location, the object will need to be coordinated with the Federal Aviation Administration 45 days prior to construction through the Obstruction Evaluation / Airport Airspace Analysis (OE/AAA) portal at <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp>. (INDOT Aviation)
5. Any work in a wetland area within right-of-way or in borrow/waste areas is prohibited unless specifically allowed in the U.S. Army Corps of Engineers permit. (INDOT ESD)
6. For the contractor during construction, Citizens Energy requests that the ground and surface water be protected from any chemicals and fuels that are used in or result from the construction of the bridges and roadway. Spill prevention plans should be created for any chemicals or fuels stored on site while construction is in progress. Citizens Energy requests that equipment refueling be conducted away from the Wellhead Protection area and the streams (eastern portion of the construction site) and that spill kits be on-site so that any spills can be immediately cleaned-up. (Citizens Energy)
7. For the contractor during construction, the onsite work force should be trained and equipped to prevent spills and to respond to spills. For larger spills, arrangements should be made with an environmental response contractor. Any release of fuels or chemicals should be reported immediately to Citizens Energy Central Control System at (317) 941-7135 or if unavailable to Citizens Environmental Response at (317) 402-8636. (Citizens Energy)
8. The project must comply with the City of Indianapolis Storm Water Design and Construction Manual, including Chapter 700 Stormwater Quality and Chapter 600 Erosion and Sediment Control. (City of Indianapolis MS4)
9. Projects within the 100-year floodplain must submit plan information to the Department of Business and Neighborhood Services for a FLD permit. If this project is within a 100-year floodplain, please refer to design memo no. 2017.11 (<https://www.indy.gov/activity/indy-dpw-design-memos>). (City of Indianapolis MS4)
10. This project is in a wellhead protection area. Please include appropriate spill response in the contract documents. (City of Indianapolis MS4)
11. Include the Indianapolis DPW Hazmat Emergency response number in the contract documents (317) 327-1620. (City of Indianapolis MS4)
12. For the contractor, prior to commencement of construction, provide a list of chemicals to be used and/or stored to Indiana American Water (Katie Jamriska, Water Quality and Environmental Compliance Lead, Indiana American Water- Central Indiana Operations, 317.300.4779, [katherine.jamriska@amwater.com](mailto:katherine.jamriska@amwater.com)). Also, provide a contingency plan in case a chemical spill or leak occurs. Chemicals must be stored at a minimum of 100 feet from the bank of a water body, have proper labels, and be stored in secondary containment capable of holding 110% of the volume.

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(Indiana American Water)

13. The contractor should complete and document weekly inspections of all chemical tanks and secondary containment structures. (Indiana American Water)
14. For the contractor during construction, immediately notify Indiana American Water of a chemical spill or leak into a waterway. (Indiana American Water)
15. Buffalo Creek and Pleasant Run Creek are listed as impaired for *E. coli*. Workers who are working in or near water with *E. coli* should take care to wear appropriate PPE, observe proper hygiene procedures, including regular hand washing, and limit personal exposure. Concerning Impaired Biotic Communities (IBC), Best Management Practices (BMPs) will be used to avoid further degradation to the stream for both Buffalo Creek and Pleasant Run Creek. (INDOT SAM)
16. General AMM 1: Ensure all operators, employees, and contractors working in areas of known or presumed bat habitat are aware of all FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable AMMs. (USFWS)
17. Lighting AMM 1: Direct temporary lighting away from suitable habitat during the active season. (USFWS)
18. Lighting AMM 2: Use downward-facing, full cut-off lens lights, and direct lighting away from suitable habitat when installing new or replacing existing permanent lights. (USFWS)
19. Tree Removal AMM 1: Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to the extent practicable to avoid tree removal in excess of what is required to implement the project safely. (USFWS)
20. Tree Removal AMM 2: Apply time of year restrictions for tree removal when bats are not likely to be present (clear trees October 1 to March 31), or Limit tree removal to 10 or fewer trees per project at any time of year within 100 feet of existing road/rail surface and outside of documented roosting/foraging habitat or travel corridors; visual emergence survey must be conducted with no bats observed. (USFWS and IDNR)
21. Tree Removal AMM 3: Ensure tree removal is limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits). (USFWS)
22. Tree Removal AMM 4: Do not remove documented Indiana bat or NLEB roosts that are still suitable for roosting, or trees within 0.25 miles of roosts, or documented foraging habitat any time of year. (USFWS)
23. Structure AMM: Inspect all buildings/structures will for bats or evidence of bats, using a qualified individual, prior to demolition. If bats, or evidence of bats, are found, coordination will occur with INDOT ESD and USFWS before demolition begins. If further coordination is needed, no demolition can occur until coordination is concluded with INDOT and the Service. (USFWS)
24. Bridge AMM: Assess bridges for signs of bat use. Bridge assessments for bats are valid for two years. Therefore, additional structure assessments will occur if bridge construction begins later than October 26, 2023 (two years from last bat assessment). Construction will begin after October 26, 2023, and therefore, a new inspection of the structures shall be performed by a qualified individual and the inspection form shall be provided to INDOT Greenfield District Environmental. If signs of bats or birds are documented, the INDOT District Environmental Manager and the Service will be contacted immediately. Structure No. 49-4503F carrying South County Line Road over Pleasant Run Creek and Structure No. 49-4510F carrying South County Line Road over Buffalo Creek, were inspected for the presence of bats on July 11, 2018, July 13, 2020, and October 26, 2021. No signs of bats were observed. (USFWS)
25. Structure No. 49-4503F carrying South County Line Road over Pleasant Run Creek and Structure No. 49-4510F carrying South County Line Road over Buffalo Creek and the project's surrounding habitat is conducive for use (i.e. nests) by a bird species protected under the Migratory Bird Treaty Act (MBTA). Prior to the start of nesting season (May 1) the structure must be inspected for birds or signs of birds. If birds or signs of birds are found during the inspection avoidance and minimization measures must be implemented prior to the start of and during the nesting season. Nests without eggs or young should be removed prior to construction during the non-nesting season

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(September 8 – April 30) and during the nesting season if no eggs or young are present. Nests with eggs or young cannot be removed or disturbed during the nesting season (May 1 – September 7). Nests with eggs or young should be screened or buffered from active construction. Details of the required procedures are outlined in the "Potential Migratory Bird on Structure" USP/RSP. (INDOT)

26. The Johnson County Surveyor's Office would like to receive assistance with any cornerstone monumentation or excavation along the route of the project. (Johnson County Surveyor)
27. Archaeology sites 12Ma1077 and 12Ma1078 will be labeled on the plans as "Environmentally Sensitive Areas" and shall not be disturbed. (INDOT CRO)
28. Property owners will be offered the opportunity to have new trees planted beyond the new right-of-way to offset the loss of the existing trees in both the Ridge Hill Trails Section 1 Subdivision and the Carefree Subdivision (INDOT CRO).
29. The existing Ridge Hill Trails signs located on either side of Ridge Hill Drive at County Line Road will be relocated out of the construction limits to a location comparable in relation to each roadway as the existing signs (INDOT CRO).

### For Further Consideration:

30. Minimize the extent of artificial bank stabilization and use bioengineering methods wherever feasible. (USFWS)
31. If riprap is utilized for bank stabilization, extend it below low-water elevation to provide aquatic habitat (if applicable). (USFWS)
32. Use best methods to contain soil and sediment runoff during construction. Use silt curtains or other devices at the downstream end of the project to contain bottom sediment in the newly excavated channel and to prevent it from adding to the downstream sediment load. Maintain such devices by removal of accumulated sediment. (USFWS)
33. Restrict below low-water work in streams to placement of culverts, piers, pilings and/or footings, shaping of the spill slopes around the bridge abutments, and placement of riprap. (USFWS)
34. Culverts should span the active stream channel, should be either embedded or a 3-sided or open-arch culvert, and be installed where practicable on an essentially flat slope. When an open-bottom culvert or arch is used in a stream, which has a good natural bottom substrate, such as gravel, cobbles and boulders, the existing substrate should be left undisturbed beneath the culvert to provide natural habitat for the aquatic community. (USFWS)
35. Evaluate wildlife crossings under bridge/culverts projects in appropriate situations. Suitable crossings include flat areas below bridge abutments with suitable ground cover, high water shelves in culverts, amphibian tunnels and diversion fencing. (USFWS)
36. USFWS recommends using pollutant-trapping technology such as storm drain inserts, etc. (when the new sidewalks and gutters/drains are installed) to reduce the runoff of urban pollutants directly to the adjacent stream systems. (USFWS)
37. For purposes of maintaining fish and wildlife passage through a crossing structure, the Environmental Unit recommends bridges rather than culverts and bottomless culverts rather than box or pipe culverts. Wide culverts are better than narrow culverts, and culverts with shorter through lengths are better than culverts with longer through lengths. If box or pipe culverts are used, the bottoms should be buried a minimum of 6" (or 20% of the culvert height/pipe diameter, whichever is greater up to a maximum of 2') below the stream bed elevation to allow a natural streambed to form within or under the crossing structure. Crossings should: span the entire channel width (a minimum of 1.2 times the OHWM width); maintain the natural stream substrate within the structure; have a minimum openness ratio (height x width / length) of 0.25; and have stream depth, channel width, and water velocities during low-flow conditions that are approximate to those in the natural stream channel. Banklines should be restored within box and pipe structures to allow for wildlife passage above the ordinary highwater mark. (IDNR)
38. The new, replacement, or rehabbed structure, and any bank stabilization under the structure, should not create conditions that are less favorable for wildlife passage under the structure compared to the current conditions. When determining an appropriate bridge or culvert size, consider whether or not wildlife/vehicle collisions are a concern at

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the crossing site. If feasible, a larger bridge or culvert opening can allow for the movement of wildlife under the roadway in order to minimize wildlife/vehicle collisions. (IDNR)

39. Riprap must not be placed in the active thalweg channel or placed in the streambed in a manner that precludes fish or aquatic organism passage (riprap must not be placed above the existing streambed elevation). Riprap may be used only at the toe of the sideslopes up to the ordinary high water mark (OHWM). The banks above the OHWM must be restored, stabilized, and revegetated using geotextiles and a mixture of grasses, sedges, wildflowers, shrubs, and trees native to Eastern Indiana and specifically for stream bank/floodway stabilization purposes as soon as possible upon completion. (IDNR)
40. 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) or by using the 1:1 replacement ratio based on area depending on the type of habitat impacted (individual canopy tree removal in an urban streetscape or park-like environment versus removal of habitat supporting a tree canopy, woody understory, and herbaceous layer). Impacts under 0.10 acre in an urban area may still involve the replacement of large diameter trees but typically do not require any additional mitigation or additional plantings beyond seeding and stabilizing disturbed areas. There are exceptions for high quality habitat sites. (IDNR)
41. Do not excavate in the low flow area except for the placement of piers, foundations, and riprap, or removal of the old structure. (IDNR)
42. Do not construct any temporary runarounds, access bridges, causeways, cofferdams, diversions, or pumparounds. (IDNR)
43. Bank Stabilization: Establishing vegetation along the banks is critical for stabilization and erosion control. In addition to vegetation, some other form of bank stabilization may be needed. While hard armoring alone (e.g. riprap or glacial stone) may be needed in certain instances, soft armoring and bioengineering techniques should be considered first. In many instances, one or more methods are necessary to increase the likelihood of vegetation establishment. Combining vegetation with most bank stabilization methods can provide additional bank protection and help reduce impacts upon fish and wildlife. Information about bioengineering techniques can be found at <http://www.in.gov/legislative/iac/20120404-IR-312120154NRA.xml.pdf>. The following is a USDA/NRCS document that outlines many different bioengineering techniques for streambank stabilization: <http://directives.sc.egov.usda.gov/17553.wba>. (IDNR)
44. Operate equipment used to replace the bridge from the existing roadway. (IDNR)
45. Use minimum average 6 inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids. (IDNR)
46. Place the trail in or adjacent to existing rights-of-way 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. (IDNR)
47. 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 <http://www.access-board.gov/attachments/article/1500/outdoor-rule.pdf>, Accessibility Guidelines for Outdoor Developed Areas). (IDNR)
48. 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.

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(IDNR)

49. Trails designed to follow a stream's course must be placed outside of 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. (IDNR)
50. 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. (IDNR)
51. 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. (IDNR)
52. Screen wildlife habitat from the trail corridor. Vegetation, topography, and fences can help reduce the impact of noise and line of sight 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. (IDNR)
53. 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. (IDNR)
54. 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. (IDNR)
55. 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. (IDNR)
56. 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. (IDNR)
57. 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. (IDNR)
58. The drainage for the project area is predominately by storm sewers and open ditches. It is vitally important to maintain good erosion control to keep sediment from entering the storm sewer system. Please provide adequate erosion control measures throughout the project and ensure that they are well maintained. For assistance please contact the Marion County Urban Conservationist and visit <http://marionswcd.org/construction/>. (Marion County SWCD)
59. The receiving waters for this construction project are Buffalo Creek and Pleasant Run. Protection of these streams is vital to adequate drainage of the watershed and protection of the wildlife habitat and natural resources of the area. Provide an adequate emergency protection plan for soil & water resources in case of spills. Please also provide adequate erosion control measures throughout the project and ensure that they are well maintained. For assistance please contact the Marion County Urban Conservationist and visit <http://marionswcd.org/construction/>. (Marion County SWCD)
60. Naturally vegetated buffer strips along lakes, ponds, streams and wetlands are critical to the health of these water

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bodies. Buffers provide protection by filtering runoff water, helping with shoreline stabilization, preserving fish & wildlife habitat and discouraging over use by geese. We highly recommend the use of buffer strips of at least 25 feet width or over 50 feet for sensitive areas such as wetlands. Choosing native species is preferred. For more information & suggested plant lists see <http://marionswcd.org/water-quality/>. (Marion County SWCD)

61. This project contains areas of highly erodible soils. It is imperative that these slopes are well protected at all times during the project and well vegetated after the construction process is complete. Frequent inspections, especially after rainfall events and quick response to maintenance to all erosion control measures must be a high priority on this site. For assistance please contact the Marion County Urban Conservationist and visit <http://marionswcd.org/construction/>. (Marion County SWCD)
62. The area downstream from this project area is known to have flooding or drainage problems. Please ensure that development is done in such a way that adequate storage is provided and the outlet is adequate to receive the drainage. (Marion County SWCD)
63. This project contains (or is adjacent to) areas marked as wetlands on the National Wetland Inventory Map. Be sure to obtain all necessary permits. Special care must be given to protect wetland areas from construction activity and erosion. Marion County SWCD highly discourages developing wetland areas as they are vital to providing storage / flood control and prime wildlife habitat. (Marion County SWCD)
64. This project contains areas mapped as a flood zone. Marion County SWCD highly discourages developing land in flood zones as they are vital to providing storage / flood control and prime wildlife habitat. (Marion County SWCD)
65. This project contains areas of highly permeable soils. Please ensure that extra precautions are taken to protect ground water resources. (Marion County SWCD)
66. Preserving & protecting existing quality trees on a construction site can enhance the aesthetics of a property, protect natural resources including soil & water, and can save the expense of planting new smaller grade trees on the back end of the project. Protect trees by fencing off and posting preservation areas around the trees. Protecting the tree root zones from compaction and stockpiled top soil (which can suffocate the trees) is vital to maintaining tree health during construction. While protecting the roots out to the drip line of the tree is essential, protecting the roots that extend beyond this area is preferred. The preferred tree protection zone is calculated by measuring the distance from the trunk to the edge of the dripline (critical root zone) and adding that distance outside of the critical root zone area. (Marion County SWCD)
67. Planting trees is a wise investment for the future. Trees provide many benefits aesthetically, environmentally and socially. Choosing the right tree for the intended location is a critical component in assuring healthy mature trees for the future. Consider the mature height & width of the tree species, the soil type, microclimate, & proximity to other trees, buildings & utilities when making selections. Trees are often planted too close to buildings, streets and sidewalks because their future root zone is not considered. We highly recommend choosing native species because of their natural resistance to disease and being well acclimated to our local climate. The Marion County SWCD website has a number of resources to help make good choices: <http://marionswcd.org/trees/>. (Marion County SWCD)
68. Marion County SWCD highly recommends using rain gardens and bioswales in new development to assist in protecting water quality and reducing offsite runoff. Please refer to the Marion County SWCD website for more information on these practices: <http://marionswcd.org/watermanagement>. (Marion County SWCD)
69. Marion County SWCD highly recommends that new developments consider using native plant species in their landscapes. Native plants are non-invasive, provide wildlife food & habitat, are well suited to our soils and climate and have a natural resistance to insects & diseases often found in our area. A fact sheet is available on the Marion County SWCD website which gives more information on native species: <http://marionswcd.org/plants/>. (Marion County SWCD)

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