FHWA-Indiana Environmental Document

CATEGORICAL EXCLUSION / ENVIRONMENTAL ASSESSMENT FORM

GENERAL PROJECT INFORMATION

Road No./County:	Hillegas Road / Allen County, Indiana
Designation Number(s):	1901705 (lead), 2500056, & 2201692
Project Description/Termini:	Added Travel Lanes on Hillegas Road (Rd.) from State Boulevard (Blvd.) to Coliseum Blvd. The southern project terminus is approximately 273 feet south of the intersection of Hillegas Rd. and State Blvd. and the northern terminus is at the intersection of Hillegas Rd. and Coliseum Blvd, for an overall project length of 1.15 miles. Additional storm sewer and grading work will be completed along State Blvd., from 1,000 feet east of Hillegas Rd. to Weststate Court (Ct.).

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

Approval

INDOT DE Signature and Date

INDOT ESD Signature and Date

FHWA Signature and Date

Release for Public Involvement

N/A
INDOT DE Initials and Date

ADWP June 3, 2026
INDOT ESD Initials and Date

Certification of Public Involvement

INDOT Consultant Services Signature and Date

INDOT DE/ESD Reviewer Signature and Date:

Name and Organization of CE/EA Preparer: Paul Killian, GAI Consultants

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

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.**

	Yes	No
Does the project have a historic bridge processed under the Historic Bridges PA*?		X
If No, then:		
Opportunity for a Public Hearing Required?	X	

**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 were mailed to potentially affected property owners near the project area on July 12, 2023, 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, page G1.

Project Does Meet
The project meets the minimum requirements described in the current *Indiana Department of Transportation (INDOT) Project Development Public Involvement Procedures Manual* which requires the project sponsor to offer the public an opportunity to submit comments and/or request a public hearing. Therefore, a legal notice will appear in a local publication contingent upon the release of this document for public involvement. This document will be revised after the public involvement requirements are fulfilled.

Public Controversy on Environmental Grounds

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

No controversy
At this time, there is no substantial public controversy concerning impacts to the community or to natural resources.

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

Sponsor of the Project: City of Fort Wayne INDOT District: Fort Wayne

Local Name of the Facility: Hillegas Road

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

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

PURPOSE AND NEED:

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

Need
The existing segment of Hillegas Rd. is inadequate to support the current and projected vehicular traffic volumes. According to the

Abbreviated Engineer's Assessment (Appendix I, pages I2 to I10), the 2025 Annual Average Daily Traffic (AADT) using this segment of the roadway is estimated at 19,958 AADT and is expected to increase by 2045 to 24,091 AADT. Traffic volumes for the existing configuration of Hillegas Rd. as a two-lane facility (one travel lane in each direction), functions at a LOS E (operations at or near capacity, with unstable flow and long delays) and at a 20-year traffic volume (2045) is expected to function at a LOS F. LOS is rated from A (free-flow conditions with minimal congestion and high speeds) to F (meaning forced or breakdown flow with significant congestion, queuing, and very low speeds). A LOS D is considered the threshold for unstable flow per the 2022 *Federal Highway Administration Capacity Manual.*

Crash data from 2020 to 2025 demonstrate a clear upward trend indicative of congestion-related and operational deficiencies. Annual crashes increased by approximately 35% over this period, with an average annual growth rate of approximately 9%. A total of 239 vehicular crashes occurred within the project area, of which over half (131) were rear-end collisions, indicating congestion and queuing-related conflicts. Additionally, eight head-on collisions were recorded, representing higher-severity opposing-direction conflicts, and 57 crashes resulted in injuries. The existing pavement is also exhibiting severe deficiencies ranging from longitudinal and transverse cracking to potholes, compromising roadway integrity.

The corridor lacks adequate pedestrian facilities, except for a short, 500-foot (ft.) section on the west side of Hillegas north of Concept Ct., limiting safe non-motorized travel.

Additionally, the existing roadway drainage is limited and does not have an adequate carrying capacity for future development to maintain proper drainage and prevent flooding.

Purpose
The purpose of this project is to enhance traffic mobility by improving the LOS to a C (stable flow with some restrictions on maneuverability and slightly longer delays) or better by design year 2045. The increase in LOS will also improve safety by reducing crash frequency and severity, with a reduction of rear end collisions and head on collisions. In conjunction with mobility and safety, the project will also correct the pavement distress deficiencies and deterioration to ensure a safe and efficient transportation corridor. The project also aims to provide pedestrian accommodations, and address improvements to stormwater management to facilitate future growth and development along the corridor.

PROJECT DESCRIPTION (PREFERRED ALTERNATIVE):

County: Allen Municipality: Fort Wayne

Limits of Proposed Work: From approximately 273 feet south of Hillegas and State Blvd. intersection to the intersection of Hillegas Rd and Coliseum Blvd.

Total Work Length: 1.34 Mile(s) Total Work Area: 18.5 Acre(s)

	Yes[1]	No
Is an Interstate Access Document (IAD)[1] required?		X
If yes, when did the FHWA provide a Determination of Engineering and Operational Acceptability?	Date:	

[1]*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 Fort Wayne with funding from Federal Highway Administration (FHWA) intends to proceed with Added Travel Lanes on Hillegas Rd. from State Blvd. to Coliseum Blvd. in Allen County, Indiana.

Location:
This project is located on Hillegas Rd, from State Blvd. to Coliseum Blvd. in the City of Fort Wayne. Specifically, the project is in Sections 28, 29, 32 & 33 of Township 31 North, Range 12 East, as shown on the Fort Wayne West USGS 7.5 Minute Topographic Map. Project maps and ground-level photographs are provided in Appendix B, pages B4-B7.

Existing Conditions:
Hillegas Rd, classified as an Urban Minor Arterial, is a two-lane roadway, with one 11-foot-wide lane in each direction with left-turn lanes at major intersection roadways. Paved shoulders are present along Hillegas Rd ranging from two to six feet wide. No pedestrian facilities are located along the corridor except for an approximately 500 ft. long sidewalk that extends along the west side of Hillegas Rd from Concept Drive to the north along the Evapar property. The posted speed limit is 45 Miles Per Hour (mph). The existing pavement has numerous deficiencies ranging from longitudinal, transverse, and alligator cracking. The pavement has edge raveling, and various areas have been patched most likely due to potholes. Additionally, the existing segment of Hillegas Rd. is inadequate to support the current vehicular Average Daily Traffic (19,958 vpd AADT) that uses this segment of the roadway. From 2020 to 2025, 239 vehicular accidents occurred in the project area. Over half (131) of the total crashes were rear-end collisions, eight were head-on crashes, and a total of 57 crashes resulted in injuries during this time frame. 2025 traffic volumes for Hillegas Rd. function at a LOS E, and a 20-year traffic volume, for design year 2045, is expected to function at LOS F. Land use in the vicinity of the project is primarily residential and commercial.

Preferred Alternative:
The proposed project will add two additional travel lanes (one in each direction) and repave the existing lanes on Hillegas Rd. from State Blvd. and Coliseum Blvd. The roadway will consist of four 11-foot (ft.) wide travel lanes, a 12 ft. wide landscaped median, and left turn lanes at intersections as needed. The project will include curb and gutter on both sides with an underground storm sewer system and green infrastructure (GI) components between the curb and pedestrian facilities to address drainage on the roadway. A 10-ft. wide trail will be added on the east side of Hillegas Rd. and a five ft. wide sidewalk on the west side is proposed. There will be a six-foot-wide grass buffer or GI between both the sidewalk and trail and curbline of Hillegas Road. In addition, American Disability Act (ADA) curb ramps will be installed at all intersections.

To increase the water quality and to reduce the rate of discharge of the stormwater from the roadway, a fore bay retention basin is proposed to be constructed within the existing Right-of-Way (ROW) of an unimproved road, south of State Blvd. The basin will incorporate green infrastructure elements as part of the retention basin to filter the first 1-inch of rainfall (first flush) of stormwater. A closed conduit storm sewer with the use of a drainage easement, was chosen to discharge the most southern watershed to reduce ROW impacts and allow the property owners to utilize the above ground area. The 12-inch RCP closed conduit storm sewer discharges to the fore bay retention basin, which then discharges to the Lowther-Neuhaus Ditch via Structure 105. The installation of Structure 105, a 1 ft. outfall pipe from the green infrastructure basin and forebay, will impact a total of 2.5 linear ft.(lft.) of the Lowther-Neuhaus Ditch with the installation of a 2.5 ft. wide by 2.5 ft. long by 1.5 ft. deep Class II Riprap scour pad.

In addition to the roadway and drainage improvements, the project includes the replacement of two small structures at regulated drain crossings: Sargent Ditch and Prange Drain. The existing culvert at Sargent Ditch, a 36-inch diameter by 85.5 ft. long reinforced concrete pipe (RCP), will be replaced with a 42-inch diameter by 148 ft. long, smooth interior, RCP. The new structure will be installed at a 23-degree skew to the right (north), and the existing alignment will be backfilled with Type 2 structural fill. A 20 ft. long by 23 ft. wide by 2 ft. deep, Class II riprap scour pad on geotextile will be placed at the structure's outfall. This will result in approximately 288.5 lft. of impacts to the waterway. The existing structure at Prange Drain, a 131-inch span by 85-inch rise by 105 ft. long, structural plate pipe arches (S.P.P.A.), will be replaced with a 136-inch span by 87-inch rise by 133 ft. long, elliptical RCP. A 35.5 ft. long by 37 ft wide by 2 ft. deep, Class I riprap scour pad will be placed on geotextile at the structure's outfall. This will result in approximately 168.5 lft of impacts to Prange Drain. All proposed structures are designed to reduce backwater elevations, improve outlet velocities, and meet INDOT's freeboard and scour protection requirements. Riprap will be placed at both outfalls to mitigate scour erosion. These structure replacements are necessary to accommodate the increased roadway width and ensure long-term hydraulic functionality.

Maintenance of traffic (MOT) will require phased construction while maintaining one travel lane in each direction on Hillegas Rd., utilizing the existing pavement and temporary widening pavement. Refer to the MOT section in this document for additional information. Preliminary plan sheets are provided in Appendix B, pages B19 to B217.

This alternative meets the purpose and need by addressing the traffic volume by providing a LOS C or better, which addresses the safety of motorist traffic by reducing the frequency and severity of collisions. It also addresses the roadway deterioration and provides pedestrian facilities throughout the corridor. Additionally, this alternative provides adequate storm-water management to accommodate future growth and development.

Logical Termini/Independent Utility:
This project demonstrates independent utility as it is a stand-alone project that is not dependent on any other planned projects. The termini were developed to minimize the overall impacts of the project while including limits to incorporate the INDOT design criteria and consideration of roadway geometrics. The project termini encompass only the area necessary to construct the added travel lands and tie the improvements into the existing roadway for a smooth transition.

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.

The No Build
The "No Build" alternative was considered for the proposed project. This alternative proposed utilization of the existing roadway with no expenditure of capital funds or improvement. However, the "No Build" alternative would not address these projects' purpose and need, which is to address the existing safety issues, improve drainage throughout the segments, and provide safe pedestrian movements to and from residential and commercial facilities.

Due to the increase in impervious area the need for storm sewer is necessary. As an environmental benefit, the city is also including green infrastructure.

Additionally, the "No Build" would discharge the most southern watershed utilizing the existing roadside ditch along the north side of State Blvd. After analyzing the capacity of the existing roadside ditch, it was determined it was not adequate for the proposed flows.

Single Lane Addition
This alternative would entail an additional lane on either side of Hillegas Rd. The alternative would save cost but would only partially address deficiencies in the roadway, safety concerns or impact community cohesion and accessibility, thus failing to fully meet the need and purpose of the project. Therefore, this alternative was eliminated from further consideration.

Re-pavement
This alternative would entail re-paving the existing roadway. While this alternative would be cost-effective and help address some existing pavement deficiencies, it would fail to correct current capacity deficiencies. Therefore, this alternative was eliminated from further consideration.

New Road
This alternative would entail creation of an entirely new roadway to connect Coliseum Blvd. and State Blvd. This alternative would aid in existing capacity deficiencies however its cost and large, potentially negative, community impact makes this alternative unfeasible. The existing roadway pavement deficiencies would also fail to be corrected with this alternative. This alternative would only partially meet the purpose and need of the project. Therefore, this alternative was eliminated from further consideration.

Stormwater Alternative – Excavate Existing Ditches
This alternative would accommodate anticipated flow by widening the existing roadside ditch with a flat bottom and increasing the side slopes. The improved/widen ditch would significantly impact the adjacent residents and require additional Right of Way. Therefore, this alternative was eliminated from further consideration.

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

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

ROADWAY CHARACTER:

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

Name of Roadway: Hillegas Road
Functional Classification: Urban Minor Arterial
Current ADT: 19,958 VPD (2025) Design Year ADT: 24,091 VPD (2045)

County Allen Route Hillegas Road Des. No. 1901705, 2500056 & 2201692

Design Hour Volume (DHV): 2,002 Truck Percentage (%) 2.4
Designed Speed (mph): 45 Legal Speed (mph): 45

	Existing		Proposed	
Number of Lanes:	Two		Four	
Type of Lanes:	Through		Through and turn	
Pavement Width:	11	ft.	11	ft.
Shoulder Width:	2-6	ft.	N/A	ft.
Median Width:	0	ft.	4-12	ft.
Sidewalk Width:	0	ft.	5-10	ft.

Setting:		Urban	X	Suburban		Rural
Topography:	X	Level		Rolling		Hilly

BRIDGES AND/OR SMALL STRUCTURE(S):

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

Structure/NBI Number(s): N/A Sufficiency Rating: N/A
(Rating, Source of Information)

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

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

Presence

Two pipes within the project area will be impacted. Storm sewers and GI will be installed with an outlet pipe to accommodate stormwater within the project limits.

Structure One is a 36-inch diameter by 85.5 ft. long RCP with a single span of 5 feet over Sargent Ditch. The existing structure will be removed and backfilled with Type 2 structural fill. The new structure will be a 42-inch diameter by 148 ft. long, smooth interior RCP, installed at a 23-degree skew right to better align with the stream channel. The new culvert would increase net area through the structure from 7.1 square feet (sft) to 18.6 sft.

Structure Two is a 131-inch span by 85-inch rise by 105 ft. long, S.P.P.A. conveying Prange Drain. This structure is proposed to be fully removed and replaced with a 136-inch span by 87-inch rise by 133 ft. long elliptical RCP, which would increase net area through the structure from 60.7 sft to 62.6 sft.

A 12-inch diameter by 27.5 ft. long RCP (Structure 105) will be installed to discharge the fore bay retention basin to the Lowther-Neuhaus Ditch.

MAINTENANCE OF TRAFFIC (MOT) DURING CONSTRUCTION:

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

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 MOT for the project will require phased construction while maintaining one travel lane in each direction on Hillegas Rd., utilizing the existing pavement and temporary widening pavement. The 500 ft. section of sidewalk on the west side of Hillegas Rd. to the north of Concept Ct. will be temporarily closed during construction, with no pedestrian MOT proposed as this is an isolated sidewalk with no direct connections.

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

ESTIMATED PROJECT COST AND SCHEDULE:

Engineering: $ 2,375,948 (2022) Right-of-Way: $ 1,875,000* (2024) Construction: $ 9,950,000 (2028) $10,050,000 (2030)

Anticipated Start Date of Construction: March 2028

***An Early Acquisition CE for Des 1901705, 2201692, & 2201694 was approved on May 19, 2023 (Appendix I, page I11).**

RIGHT OF WAY:

Land Use Impacts	Amount (acres) Permanent	Temporary
Residential	1.215	2.005
Commercial	1.229	3.282
Agricultural	0	0
Forest	0	0
Wetlands	0	0
Other: Church	0.099	0.354
Other:	0	0
TOTAL	2.543	5.638

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 (ROW) is 100 feet wide (50 feet on either side of the centerline).

ROW Required
The project requires approximately 2.543 acres of permanent ROW comprised of commercial, church, and residential properties. The project also requires approximately 5.638 acres of temporary ROW from commercial, church, and residential property.

The City of Ft. Wayne and the FHWA completed an advanced acquisition of ROW from 66 parcels due to the accelerated project schedule and to capitalize on economic conditions and fiscal constraints of highway funding. The approved CE-1 signature page for the advanced acquisition of ROW, signed by INDOT on May 19, 2023, is located in Appendix I, page I11.

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.

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 February 1, 2022, Appendix C, page C1.

Agency	Date Sent	Date Response Received	Appendix Page(s)
US Fish and Wildlife Service (USFWS)	2/01/2022	03/10/2022	C4 to C5
Natural Resources Conservation Service (NRCS)	2/01/2022	3/4/2022	C6
Department of the Army, Detroit District, US Corps of Engineers (USACE)	2/01/2022	No Response	N/A
National Park Service	2/01/2022	No Response	N/A
U.S. Department of Housing & Urban Development, Chicago Regional Office	2/01/2022	No Response	N/A
Indiana Geological and Water Survey (IGWS)	2/01/2022	02/08/2022	C7 to C9
Indiana Department of Natural Resources Division of Fish and Wildlife (IDNR-DFW)	2/01/2022	03/01/2022	C10 to C14
Indiana Department of Environmental Management (IDEM) Groundwater Section	2/01/2022	02/11/2022	C15 to C16
IDEM Wetlands and Stormwater Programs	2/01/2022	No Response	N/A
INDOT Fort Wayne District	2/01/2022	02/25/2022	C17
INDOT Aviation	7/29/2025	7/30/2025	C19
FHWA	2/01/2022	No Response	N/A
Allen County Council Members	2/01/2022	No Response	N/A
Allen County Commissioner Members	2/01/2022	No Response	N/A

Allen County Engineer	2/01/2022	No Response	N/A
Allen County Highway Director	2/01/2022	No Response	N/A
Allen County Surveyor	2/01/2022	No Response	N/A
Northeastern Indiana Regional Coordinating Council (NIRCC)	2/01/2022	2/8/2022	C-18
Three Rivers Wesleyan Church	2/01/2022	No Response	N/A
Finnegan's Playground Indoor Dog Park	7/29/2025	No Response	N/A
Zurcher Tire New Warehouse	7/29/2025	No Response	N/A

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

SECTION B – ECOLOGICAL RESOURCES:

	Presence	Impacts	
		Yes	No
Streams, Rivers, Watercourses & Other Jurisdictional Features	X	X	
Federal Wild and Scenic Rivers			
State Natural, Scenic or Recreational Rivers			
Nationwide Rivers Inventory (NRI) listed			
Outstanding Rivers List for Indiana			
Navigable Waterways			

Total stream(s) in project area: 715 Linear feet Total impacted stream(s): 459.5 Linear feet

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)
UNT 1	perennial	77	0	UNT 1 flows northwest to southeast, likely Water of the US, Appendix F, page F7
Prange Drain/UNT 2	perennial	188	168.5	UNT 2 flows west to east, likely Water of the US, Appendix F, page F7
Sargent Ditch/UNT 3	ephemeral	350	288.5	UNT 3 flows west to east, likely Water of the US, Appendix F, page F7
Lowther Neuhaus Ditch	perennial	100	2.5	Lowther Neuhaus Ditch flows southeast to northwest, likely Water of the US, Appendix F, page F7

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.

Presence, with impacts
Based on the desktop review, the aerial map of the project area (Appendix B, page B3), and the RFI report (Appendix E, pages E1 to E16) there are ten streams within the 0.5 mile search radius. There are four streams within or adjacent to the project area. That number was confirmed by the site visit on May 15, 2024.

Waters Report
A *Waters of the U.S. Determination / Delineation Report* was completed for the project on September 17, 2024. Please refer to appendix F, pages F1 to F23 for the *Waters of the U.S. Determination / Wetland Delineation Report*. It was determined that four

streams, Unnamed Tributary (UNT) 1, Prange Drain (UNT 2), Sargent Ditch (UNT 3), and Lowther Neuhaus Ditch, are likely jurisdictional Waters of the U.S. The USACE makes all final determinations regarding jurisdiction.

UNT 1
UNT 1 is perennial, USGS Blue Line stream that flows northwest to southeast through the project area. UNT 1 is a manmade ditch that does not have a mapped upland drainage area. UNT 1 is a channelized stream, with artificial banks and a substrate comprised primarily of riprap and silt, and has a defined bed, bank, and ordinary high water mark (OHWM). The OHWM at the structure is 2 feet wide and two feet deep. The stream has a narrow riparian zone on the west side of Hillegas Rd. that consists of white ash (*Fraxinus americana*, FACU), Queen Anne's lace (*Daucus carota*, UPL), wild teasel (*Dipsacus fullonum*, FACU), and common evening-primrose (*Oenothera biennis*, FACU). The riparian zone on the east side of Hillegas Rd. consists primarily of maintained lawn (Kentucky bluegrass, Poa pratensis, FAC). No sinuosity was present within the project area. The quality of the stream would be considered poor due to the lack of in stream habitat and bank diversity. UNT 1 would likely receive a QHEI (Qualitative Habitat Evaluation Index) score of 20-30 due to the above-mentioned factors. UNT 1 connects to Lowther Neuhaus Ditch, which drains to Spy Run Creek, which drains to the St. Mary's River, a relatively permanent water (RPW), and tributary of the Maumee River, a traditional navigable water (TNW), therefore, would likely be considered a Waters of the US. Approximately 77 feet of UNT 1 is within the project area.

Prange Drain/UNT 2
Prange Drain/UNT 2 is a perennial, USGS Dashed Blue Line stream that flows west to east through the project area and has an upstream drainage area of 0.557 square miles. UNT 2 is a channelized stream with a silt substrate that has a defined bed, bank and OHWM. The OHWM at the structure is 12 feet wide and 1 foot deep. The riparian zone is forested on both sides of the structure and exhibited habitat diversity with vegetation that consisted of green ash (*Fraxinus pennsylvanica*, FACW), silver maple (*Acer saccharinum*, FACW), sugar maple (*Acer saccharum*, FACU), hackberry (*Celtis occidentalis*, FAC), American elm (*Ulmus americana*, FACW), red oak (*Quercus rubra*, FACU), amur honeysuckle (*Lonicera maackii*, UPL), may apple (*Podophyllum peltatum*, FACU), Virginia creeper (*Parthenocissus quinquefolia*, FACU), false solomans-seal (*Maianthemum racemosum*, FACU), and reed canary grass (*Phalaris arundinacea*, FACW). The quality of the stream would be considered average due to the amount of instream cover and habitat diversity and the presence of riffle and run complexes. No sinuosity was present within the project area sampling reach. UNT 2 would likely receive a QHEI score of 35-45 due to the above-mentioned factors. UNT 2 connects to Lowther Neuhaus Ditch, which discharges into Spy Run Creek which connects to the St. Mary's River, a RPW, and tributary of the Maumee River, a TNW, therefore, would likely be considered a Waters of the US. Approximately 94 feet of UNT 2 is within the project area.

Sargent Ditch/UNT 3
Sargent Ditch, UNT 3 is an ephemeral stream that flows west to east through the project area and has an upstream drainage area of 0.223 square miles. UNT 3 has a defined bed, bank, and OHWM. The OHWM at the structure is 9 feet wide by 0.5 feet deep. The riparian zone is forested on both sides of the structure with surrounding vegetation that consists primarily of silver maple (*Acer saccharinum*, FACW), Eastern redbud (*Cercis canadensis*, FACU), American elm (*Ulmus americana*, FACW), Eastern cottonwood (*Populus deltoides*, FAC), hackberry (*Celtis occidentalis*, FAC), and amur honeysuckle (*Lonicera maackii*, UPL). The quality of the stream would be considered poor due to the high turbidity and low sinuosity present within the project area sampling reach. UNT 3 would likely receive a QHEI score of 20-30 due to the above-mentioned factors. UNT 3 connects to Lowther Neuhaus Ditch, which discharges into Spy Run Creek which connects to the St. Mary's River, a RPW, and tributary of the Maumee River, a TNW, therefore, would likely be considered a Waters of the US. Approximately 84 feet of UNT 3 is within the project area.

Lowther Neuhaus Ditch
Lowther Neuhaus Ditch is a perennial, USGS Dashed Blue Line stream that flows southeast to northwest through the project area and has an upstream drainage area of 0.941 square miles. Lowther Neuhaus Ditch has a defined bed, bank, and OHWM. The OHWM at the project area of 8 feet wide by 6 inches deep. The riparian zone is forested on both sides of the stream with surrounding vegetation consisting of green ash (*Fraxinus pennsylvanica*, FACW), American elm (*Ulmus americana*, FACW), Eastern cottonwood (*Populus deltoides*, FAC), hackberry (*Celtis occidentalis*, FAC), amur honeysuckle (*Lonicera maackii*, UPL), Virginia creeper (*Parthenocissus quinquefolia*, FACU), spicebush (*Lindera benzoin*, FACW) as the majority of species. The quality of the stream would be considered average due to the amount of instream cover and habitat diversity and the presence of pool and run complexes. Little sinuosity was present within the project area sampling reach. Lowther Neuhaus Ditch would likely receive a QHEI score of 35-45 due to the above-mentioned factors. Lowther Neuhaus Ditch which discharges into Spy Run Creek which connects to the St. Mary's River, a RPW, and tributary of the Maumee River, a TNW, therefore, would likely be considered a Waters of the US. Approximately 65 feet of Lowther Neuhaus Ditch is within the project area.

The Lowther Neuhaus Ditch is also an IDEM 303(d) listed stream, impaired for E. coli, impaired biotic communities (IBC) and is included in the St. Marys River and Maumee River Watershed total maximum daily load (TMDL), as outlined in the RFI Report (Appendix E, pages E1 to E16). Best management practices (BMPs) will be used to avoid further degradation of the stream to address the IBC. 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. These have been included in the Commitments section of this document as "Firm" commitments.

Waterway Impacts
The proposed project will result in both temporary and permanent impacts to Prange Drain/UNT 2, Sargent Ditch/UNT 3 and the Lowther Neuhaus Ditch, all considered jurisdictional Waters of the U.S. Impacts to Prange Drain/UNT 2 will be necessary for replacing the existing 131-inch span by 85-inch rise by 105 ft. long, S.P.P.A with a 136-inch span by 87-inch rise by 133 ft. long, elliptical RCP. A 35.5 ft. long by 37 ft wide by 2 ft. deep, Class I riprap scour pad will be placed on geotextile at the structure's outfall. Permanent impacts include 168.5 lft., 0.0444 acre, and 115.3 cubic yards of fill material. Temporary impacts will occur due to the installation of cofferdams upstream and downstream of the work area to facilitate construction. These measures are necessary to isolate the work zone, maintain stream flow, and minimize sedimentation and disruption to aquatic life, resulting in a total temporary impact footprint of 8 lft., 0.0022 acre, and 3.56 cubic yards.

Impacts to Sargent Ditch/UNT 3 will be necessary for the replacement of the existing 36-inch diameter by 85.5 ft. long RCP and installation of a new 42-inch diameter by 148 ft. long RCP to convey Sargent Ditch/UNT3 across Hillegas Rd. A 20 ft. long by 23 ft. wide by 2 ft. deep, Class II riprap scour pad on geotextile will be placed at the structure's outfall. The installation of the new structure will require the relocation of Sargent Ditch/UNT3 approximately 7.5 ft. (23-degrees) to the north on the outfall and the existing alignment will be backfilled with Type 2 structural fill. Total permanent impacts to Sargent Ditch/UNT 3 are approximately 288.5 lft, 0.0478 acre, and 53.33 cubic yards. This will also result in 39 lft. of new encapsulation and stream relocation will total 183 lft (0.0378 acre, and 30.50 cubic yards of fill), which are accounted for in the prior totals. Temporary impacts to Sargent Ditch/UNT 3 from the installation of impervious materials upstream and downstream of the work zone within the channel for dewatering and pumparound activities will total 6 lft., 0.0012 acre, and 1.0 cubic yards.

Impacts to Lowther Neuhaus Ditch will be necessary for the installation of Structure 105, a 1 ft. outfall pipe from the green infrastructure basin and forebay. Permanent impacts include the installation of a 2.5 ft. wide x 2.5 ft. long x 1.5 ft. deep Class II Riprap scour pad. Approximately 0.4 ft. of the scour protection riprap will be below the Lowther Neuhaus Ditch OHWM, for a total impact of 2.5 lft., 0.00009 acre, and 0.06 cubic yards of fill. Temporary impacts will include the installation of a turbidity curtain, anchored to the northern bank, to prevent sediment transport. The temporary impacts will total 23 lft., 0.0005 acre, and 0.43 cubic yards.

The proposed project will result in permanent impacts to approximately 459.5 lft. of jurisdictional streams, totaling 0.0922 acres and 168.69 cubic yards of fill. Temporary impacts will affect an additional 37 lft., 0.004 acre, and 4.9 cubic yards. Permits for these impacts to Prange Ditch/UNT 2, Sargent Ditch/UNT 3, and Lowther Neuhaus Ditch will be necessary (see "Permits" section for details). Mitigation is likely to be necessary due to exceeding permit thresholds, loss of aquatic resources with the stream relocation, and new encapsulation. All stream crossings have been designed to minimize hydraulic and ecological disruption, with minimal footprints and avoidance measures. UNT 1 will be labeled as "Environmentally Sensitive Area – Do Not Disturb") on the project plans since no impacts are anticipated to the waterway.

Early Coordination
IDNR-DFW responded on March 1, 2022, with recommendations to avoid or minimize impacts to streams within the project area (Appendix C, page C10 to C14). IDNR-DFW recommends that no work should be done in the waterway from April 1 through June 30 without prior written approval from the Division of Fish and Wildlife. All applicable recommendations are included in the Environmental Commitments section of this CE document.

	Presence	Impacts	
Open Water Feature(s)		**Yes**	**No**
Reservoirs	☐	☐	☐
Lakes	☐	☐	☐
Farm Ponds	☐	☐	☐
Retention/Detention Basin	☐	☐	☐
Storm Water Management Facilities	☐	☐	☐
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.

No presence, no impact
Based on the desktop review, the aerial map of the project area (Appendix B, page B3), and the RFI report (Appendix E, pages E1 to E16), there are seven open water features within the 0.5 mile search radius. There are no open water features within or adjacent to the project area, which was confirmed by the site visit on May 15, 2024, by GAI. Therefore, no impacts are expected.

	Presence	Impacts	
		Yes	No
Wetlands			

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

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

Wetland No.	Classification	Total Size (Acres)	Impacted Acres	Comments (i.e. location, likely Water of the US, appendix reference)
N/A	N/A	N/A	N/A	N/A

Wetlands (*Mark all that apply*)	Documentation	ESD Approval Dates
Wetland Determination		
Wetland Delineation		
USACE Isolated Waters Determination		

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.

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.

Presence, no impact
Based on the desktop review, the aerial map of the project area (Appendix B, page B3), and the RFI report (Appendix E, pages E1 to E16) there are 43 wetlands within the 0.5 mile search radius. There is one wetland within or adjacent to the project area. That number was updated to zero by the site visit on May 15, 2024, by GAI.

Waters Report
A *Waters of the US Determination / Delineation Report* was completed for the project on September 17, 2024. Please refer to Appendix F, page F1 for the *Waters of the US Determination / Wetland Delineation Report*. It was determined that no wetlands are within the project area. The USACE makes all final determinations regarding jurisdiction.

Early Coordination
IDNR-DFW responded on March 1, 2022, with standard recommendations to avoid and mitigate the potential impact on wetlands (Appendix C, pages C10 to C14). All applicable recommendations are included in the Environmental Commitments section of this CE document.

	Presence	Impacts	
		Yes	NO
Terrestrial Habitat	X	X	

Total terrestrial habitat in project area: 30 Acre(s) Total tree clearing: 1.625 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.

Presence, with impacts
Based on a desktop review, a site visit on May 15, 2024 by GAI, the aerial map of the project area (Appendix B, page B3), there is terrestrial habitat associated with commercial and urban residential areas consisting of mowed grass. Total amount of terrestrial impacts is 25.2 acres and will include 1.625 acres of tree clearing. Dominant species to be removed include Cottonwood (*Populus deltoides*) Black Walnut (*Juglans nigra*), Silver Maple (*Acer saccharinum*), Black Locust (*Robinia pseudoacacia*), Hackberry (*Celtcis occidentalis*), and White Mulberry (*Morus alba*).

Mitigation will be required for tree clearing from 100-300 feet beyond the roadway. The ratio for the Indiana Bat will require purchase of 0.675 acres ($5,634.09) will be purchased through In-Lieu Fee via The Conservation Fund.

Early Coordination
IDNR-DFW responded on March 1, 2022, with recommendations to limit tree clearing and mitigate for habitat loss (Appendix C, pages C10 to C14). All applicable recommendations are included in the Environmental Commitments section of this CE document.

Protected Species

Federally Listed Bats	**Yes**	**No**
Information for Planning and Consultation (IPaC) determination key completed		X
Section 7 informal consultation completed (IPaC cannot be completed)	X	
Section 7 formal consultation Biological Assessment (BA) required		X

Determination Received for Listed Bats from USFWS: NE [ ] NLAA [ ] LAA [X]

Other Species not included in IPaC	**Yes**	**No**
Additional federal species found in project area (based on IPaC species list)	X	
State species (not bird) found in project area (based upon consultation with IDNR)		X

Migratory Birds	**Yes**	**No**
Known usage or presence of birds (i.e. nests)		X
State bird species based upon coordination with IDNR		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 E1 to E16), completed by GAI on July 8, 2025, the IDNR Allen County Endangered, Threatened and Rare (ETR) Species List has been checked. According to the IDNR-DFW early coordination response letter dated March 1, 2022, (Appendix C, pages C10 to C14), the Natural Heritage Program's Database has been checked and to date no plant or animal species listed as state or federally threatened, endangered, or rare have been reported to occur in the project vicinity. An INDOT 0.5 mile bat review occurred on January 26, 2022, and did not indicate the presence of endangered bat species.

Bats, Limited Formal Programmatic Consultation (i.e. IPaC) – Likely to Adversely Affect
Project information was submitted through the USFWS's Information for Planning and Consultation (IPaC) portal, and an official species list was generated (Appendix C, page C20 to C33). The project is within range of the federally endangered Indiana bat (*Myotis sodalis*) and the federally endangered northern long-eared bat (NLEB) (*Myotis septentrionalis*). Additional species were generated in the IPaC species list along with the Indiana bat and NLEB, refer to the "Other Federally Listed Species Not Covered in IPaC" section below.

The project qualified and completed Limited Formal Programmatic Consultation for the Indiana bat and NLEB due to tree clearing 100-300 feet from existing roadway. An effect determination key was completed on July 8, 2025, and based on the responses

provided, the project was found to "Likely to Adversely Affect" the Indiana bat and/or the NLEB (Appendix C, pages C34 to C48). Proposed impacts have been minimized and cannot be avoided due to the project not meeting with purpose and need.

INDOT verified the effect finding and submitted to USFWS on June 10, 2025. On July 8, 2025, USFWS issued a concurrence letter with the "Likely to Adversely Affect" finding (Appendix C, pages C49 to C52). The Avoidance and Minimization Measures (AMM) include the following: tree removal AMM 1, tree removal AMM 2, tree removal AMM 4, lighting AMM 1, lighting AMM 2, and general AMM 1. AMMs and/or commitments are included as firm commitments in the Environmental Commitments section of this document.

Additionally, a "Reinitiation Notice" is required if: more than 0.27 acre of suitable habitat is to be cleared; new information about listed species is encountered; the project is modified in a manner that causes an effect to the listed species; or a new species or critical habitat is listed that the project may affect. These requirements, and the AMMs from the Project Submittal Form, are included as firm commitments for this project.

INDOT shall satisfy the compensatory mitigation requirements of the formal consultation with USFWS through one of the conservation options outlined on page 41 of the May 20, 2016 Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana bat and NLEB. The amount to be paid to the Range-wide In-lieu Fee Program, to be administered by The Conservation Fund, shall be $5,634.09. This amount was determined by the Habitat Block Method. The area of suitable habitat to be cleared, multiplied by the mitigation ratio for inactive season tree clearing for Allen County, and the compensatory price per acre; 0.27 acre X 1.75 X $11,924.

Other Federally Listed Species Not Covered in IPaC

The official species list generated from IPaC indicated three other species present within the project area: Whooping Crane (*Grus americana*; Experimental Population, Non-Essential), the Monarch Butterfly (*Danaus plexippus*; Proposed Threatened), and Eastern Prairie Fringed Orchid (*Platanthera leucophaea*; Threatened). Based on habitat requirements, project setting, and field review, the project will have No Effect on these species.

Whooping Crane: No Effect

Four geographically distinct populations of Whooping Crane (*Grus Americana*) exist in the wild, three of which are non-essential experimental populations (EXPN). The only naturally occurring population of Whooping Crane winters along the Texas coast in Aransas National Wildlife Refuge and breeds in Wood Buffalo National Park in Alberta, Canada (U.S. Fish & Wildlife Service, n.d.-b). The EXPN of Whooping Crane identified on the IPaC species list for the site was introduced from 2001-2010 and migrates between Wisconsin and Florida (U.S. Fish & Wildlife Service, n.d.-e). The Whooping Crane typically nests in estuarine marshes dominated by bullrushes, cattails, and sedges. Migrating birds feed in agricultural fields and roost in shallow freshwater wetlands (Cornell Lab of Ornithology, n.d.).

As specified in Section 10(j) of the Endangered Species Act (ESA), on private lands, nonessential populations are treated as proposed for listing for the purposes of Section 7 consultation (U.S. Fish & Wildlife Service, n.d.-a). Therefore, the species is not protected by the take prohibitions of Section 9 of the ESA. Federal agencies must still confer with USFWS under Section 7 of the ESA if their action will jeopardize the continued existence of the nonessential population. The proposed project will not jeopardize the continued existence of the Whooping Crane. No critical habitat is present. Although the broader landscape contains wetlands and open water features conducive to crane use, the construction limits do not include any suitable roosting, foraging, or staging habitat. Noise and construction activity are not expected to cause displacement given the absence of habitat within the action area. The project will have No Effect on the Whooping Crane.

Monarch Butterfly: No Effect

There are two geographically distinct populations of Monarch Butterflies (*Danaus plexippus*) that migrate in North America. The populations are largely split by the Rocky Mountains, though they occasionally interbreed. The non-migratory populations of monarchs in North America inhabit Florida, the Gulf Coast, and California. The monarch butterfly requires grassland habitats with a prevalence of milkweed, which they rely on for laying their eggs (U.S. Fish & Wildlife Service, n.d.-d). Please note that the Monarch Butterfly is currently proposed for listing; therefore, is not protected by the take prohibitions of Section 9 of the ESA until the rule to list is finalized. Federal agencies must still confer with USFWS under Section 7 of the ESA if their action will jeopardize the continued existence of the proposed species. The proposed project will not jeopardize the continued existence of the Monarch Butterfly. The project area is characterized by maintained roadside vegetation, mowed turf, and developed land uses, which do not provide suitable milkweed habitat or high-quality nectar resources. No suitable habitat for monarch breeding or critical habitat is present within the project limits. Accordingly, the proposed project will have No Effect on the Monarch Butterfly.

Eastern Prairie Fringed Orchid: No Effect

The Eastern Prairie Fringed Orchid (*Platanthera leucophaea*) is a federally listed threatened species that occurs in high-quality wet prairie, sedge meadow, and fen habitats characterized by specific hydrologic regimes, calcareous soils, and minimal disturbance.

The Eastern Prairie Fringed Orchid also requires full sun and little or no woody encroachment.

As documented in the Waters of the U.S. Delineation, no wetlands are present within the project area. Additionally, the project corridor consists of a highly developed urban roadway surrounded by commercial and residential land uses with maintained turf grass and previously disturbed soils, as well as early successional and mature forested tracts, which lack the hydrologic and ecological conditions necessary to support wet prairie and no woody encroachment habitat requirements.

No designated critical habitat is present within or near the project area. Given the absence of suitable habitat and lack of compatible hydrologic conditions, there is no potential for direct, indirect, or cumulative effects to this species. Therefore, the proposed project will have No Effect on the Eastern Prairie Fringed Orchid.

Structure Bird and/or Bat Inspection
A culvert inspection occurred on May 15, 2024 and reinspected on May 22, 2026 for the structures carrying Hillegas Road over Prange Drain and Sargent Drain, and no evidence of bat/birds were present during the inspections (Appendix C, pages C53 to C56). The firm commitment, USFWS Bridge/Structure Assessment shall take place no earlier than two (2) years prior to the start of construction. If construction will begin after May 22, 2028, an inspection of the structure by a qualified individual, must be performed. 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.

Migratory Birds
Hillegas Road and the project's surrounding habitat is conducive for use (i.e. nests) by bird species protected under the Migratory Bird Treaty Act (MBTA). However, the structures evaluated were found unlikely to provide nesting, roosting, or perching habitats. Regardless, prior to the start of nesting season (May 1) the structures 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" 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, or if project plans are changed, USFWS will be contacted for consultation.

Geological and Mineral Resources	**Yes**	**No**
Project located within the Indiana Karst Region		X
Karst features identified within or adjacent to the project area		X
Oil/gas or exploration/abandoned wells identified in the project area		X

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

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)

Outside karst area
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 B2), the RFI report (Appendix E, page E1), there are no karst features identified within or adjacent to the project area. In the early coordination response on February 8, 2022, the IGWS did not indicate that karst features exist in the project area (Appendix C, page C7 to C9), but geological hazards include moderate liquefaction potential and floodway, mineral resources include low potential bedrock resources and low potential sand and gravel resource, and active or abandoned petroleum exploration wells. Floodway impacts are addressed in the Floodplains section of this document. The other features and concerns will not be affected due to the scope of the project, with limited excavation and roadway fill. Response from IGWS has been communicated with the designer on February 8, 2022. No impacts are expected.

SECTION C – OTHER RESOURCES

Drinking Water Resources	Presence	Impacts Yes	Impacts No
Wellhead Protection Area(s)			
Source Water Protection Area(s)			
Water Well(s)			
Urbanized Area Boundary	X		X
Public Water System(s)	X		X

	Yes	No
Is the project located in the St. Joseph Sole Source Aquifer (SSA):		X
If Yes, is the FHWA/EPA SSA MOU Applicable?		
If Yes, is a Groundwater Assessment Required?		

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.

Outside of Sole Source Aquifer (SSA)
The project is located in Allen County, 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/INDOT 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.

Not located in a Wellhead Protection Area or Source Water Area
In an early coordination letter dated February 11, 2022, IDEM stated the project is not located within a Wellhead Protection Area or Source Water Area (Appendix C, pages C15 to C16). No impacts are expected.

Wells present, no impacts
The IDNR Water Well Record Database website (https://www.in.gov/dnr/water/3595.htm) was accessed on July 18, 2025, by GAI. Many wells are adjacent throughout the project area. The features will not be affected because all wells are outside of the project area. Therefore, no impacts are expected. Should it be determined during the ROW phase that these wells will be affected, a cost to cure will likely be included in the appraisal to restore the wells.

In an Urban Area Boundary Location
Based on a desktop review of Geographic Information Systems (GIS) by GAI on January 22, 2022, this project is located in an Urban Area Boundary (UAB). An early coordination letter was sent on February 1, 2022. The MS4 coordinator did not respond within the 30 day time frame. Erosion control measures will be implemented to create a closed system that prevents sediment transport offsite in accordance with the *INDOT Quality Control Temporary Erosion and Sediment Control* RSP (205-R-261). Therefore, no impacts are anticipated.

In a Public Water System Location
Based on a desktop review, a site visit on May 15, 2024, by GAI, the aerial map of the project area (Appendix B, page B2), this project is located within the service area of a public water system maintained by the City of Ft. Wayne. Utility coordination with the City of Ft. Wayne is ongoing. Watermains and access points have been identified and are depicted on the project plans (Appendix B, Pages B19 to B217), and no impacts or conflicts have been identified to date.

Early coordination was also sent to IDEM Groundwater Section, Drinking Water Branch, Office of Water Quality, on February 8, 2022 IDEM responded that the project area is not located within a Source Water Assessment Area for a surface water supplied system (SWSS) surface water intake (Appendix C, page C15 to C16).

Floodplains	**Presence**	**Impacts** Yes	No
Project located within a regulated floodplain	X	X	
Longitudinal encroachment			
Transverse encroachment	X	X	
Homes located in floodplain within 1000' up/downstream from project			

If applicable, indicate the Floodplain Level?

Level 1 [ ] Level 2 [ ] Level 3 [X] 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.

In floodplain

Based on a desktop review of The Indiana Department of Natural Resources Indiana Floodway Information Portal website (http://dnrmaps.dnr.in.gov/appsphp/fdms/) by GAI on July 30, 2024, and the RFI report, this project is located in a regulatory floodplain as determined from approved IDNR floodplain maps (Appendix F, page F14 to F16). An early coordination letter was sent on February 1, 2022, to the local Floodplain Administrator. The floodway administrator did not respond within the 30-day time frame. This project qualifies as a Category 3 per the current INDOT CE Manual, which states the modifications to drainage structures included in this project will result in an insubstantial change in their capacity to carry flood water. This change could cause a minimal increase in flood heights and flood limits. These minimal increases will not result in any substantial adverse impacts on the natural and beneficial floodplain values; they will not result in substantial change in flood risks or damage; and they do not have substantial potential for interruption or termination of emergency service or emergency routes; therefore, it has been determined that this encroachment is not substantial.

Farmland	**Presence**	**Impacts** Yes	No
Agricultural Lands			
Prime Farmland (per NRCS)			

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

**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.

No presence, no impact

Based on a desktop review, a site visit on May 15, 2024, by GAI, the aerial map of the project area (Appendix B, page B3), there is no land that meets the definition of farmland under the Farmland Protection Policy Act (FPPA) within or adjacent to the project area. The requirements of the FPPA do not apply to this project; therefore, no impacts are expected. An early coordination letter was sent on February 1, 2022, to Natural Resources Conservation Service (NRCS). NRCS responded March 3, 2022, stating the project will not cause a conversion of prime farmland.

SECTION D – CULTURAL RESOURCES

	Category(ies) and Type(s)	**INDOT Approval Date(s)**	**N/A**
Minor Projects PA	B1, B-2, B-3, B-8, & B-9	6/11/2024 & 1/17/2025	

Indiana Department of Transportation

County Allen Route Hillegas Road Des. No. 1901705, 2500056 & 2201692

Full 106 Effect Finding

No Historic Properties Affected ☐ No Adverse Effect ☐ Adverse Effect ☐

Eligible and/or Listed Resources Present

NRHP Building/Site/District(s) ☐ Archaeology ☐ NRHP Bridge(s) ☐

Documentation Prepared (mark all that apply)		**ESD Approval Date(s)**	**SHPO Approval Date(s)**
APE, Eligibility and Effect Determination			
800.11 Documentation			
Historic Properties Report or Short Report			
Archaeological Records Check and Assessment			
Archaeological Phase Ia Survey Report	X	10/9/2023 & 12/31/2024	
Archaeological Phase Ic Survey Report			
Other:			

		MOA Signature Dates (List all signatories)
Memorandum of Agreement (MOA)		

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.

Minor Project PA Category B projects

On October 9, 2023, the INDOT Cultural Resource Office (CRO) determined that this project falls within the guidelines of Category B, Type 1, 2, 3, 8, and 9 under the Minor Projects Programmatic Agreement, (Appendix D, pages D1 to D10). The proposed work covers the following categories:

MPPA Category B1 – Sidewalks and Curb Ramps

The project includes the installation of new curb and gutter on both sides of Hillegas Rd., along with ADA-compliant curb ramps at all intersections. A 5-foot-wide sidewalk will be constructed on the west side of the roadway. These improvements occur in areas of previously disturbed or surveyed soils, and no National Register-listed or eligible archaeological or above-ground resources are present adjacent to the work areas..

MPPA Category B2 – Lighting, Signals, and Signage

The project involves the modernization of traffic signals, installation of new street lighting, and updated signage throughout the corridor. These activities will occur within previously disturbed soils and outside the viewshed of any National Register-listed or eligible above-ground resources.

MPPA Category B3 – Added Travel Lanes

The proposed improvements include the addition of two new travel lanes along Hillegas Rd., resulting in a four-lane cross-section. The work will be completed within existing or previously disturbed right-of-way. Archaeological investigations confirmed no eligible resources are present, and no above-ground historic properties are adjacent to the project area.

MPPA Category B8 – Pedestrian Facilities

The project includes construction of a 10-foot-wide multi-use trail on the east side of Hillegas Rd. and associated amenities such as landscaping, lighting, and ADA curb ramps. These facilities will be constructed in previously disturbed or surveyed areas, and no eligible archaeological or above-ground resources are present.

MPPA Category B9 – Drainage Structures

The project includes the replacement of two small structures: a 42-inch concrete pipe for Sargent Ditch and a 136-inch by 87-inch structural plate pipe arch for Prange Drain. Archaeological investigations confirmed no eligible resources are present, and the structures lack historical or engineering significance. No above-ground historic properties are adjacent to the work areas.

Archaeological Investigation

To meet the conditions of the MPPA Category B, a Phase Ia Archaeological Survey was completed by Weintraut & Associates, Inc.

(W&A) and approved by INDOT CRO on October 9, 2023 (Appendix D, pages D11-D13). An online archaeological records check conducted within the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (IDNR/DHPA), was initially completed on February 28, 2022, by archaeologist Craig Arnold, M.A., who meets the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61. One previously reported archaeological site (12AL76) was plotted adjacent to the survey area.. The records check was revisited on August 21, 2023, prior to the completion of supplementary fieldwork to ensure that no additional sites or fieldwork had been completed within the survey area. Phase Ia fieldwork was completed between April 12 and 27, 2022, on November 25, 2022, and on August 22, 2023.

The initial survey covered approximately 32.83 acres along Hillegas Rd. from West Coliseum Blvd. to West State Blvd. in Fort Wayne, Allen County. The survey included shovel testing at 15-meter intervals, with closer 5-meter intervals used in sensitive areas. The August 22, 2023 Phase Ia investigation resulted in:

Reinvestigation of Site 12AL76:
Originally recorded in 1968 as a small lithic scatter, this site was not relocated during the current survey. No artifacts were recovered, and the area has likely been disturbed by road and utility improvements. The site is recommended as not eligible for the National Register of Historic Places (NRHP) or Indiana Register of Historic Sites and Structures (IRHSS).

Identification of Four New Sites:

1. **12AL2329**: A low-density Precontact lithic scatter (2 flakes) in a disturbed commercial lot. Possibly related to 12AL76. Not eligible.
2. **12AL2330**: A mid-20th century surface dump in a wooded ravine. The site has since been destroyed by commercial development. Not eligible.
3. **12AL2331**: A small, three-sided concrete foundation with no associated artifacts. Not eligible.
4. **12AL2332**: A single historic glass bottle fragment recovered from a residential lawn. Isolated find. Not eligible.

None of the four sites appear to merit further investigation or appear to hold valuable information beyond that recorded during the reconnaissance. Due to their ephemeral nature, each of the sites appears to lack the potential to yield any additional important information and are, therefore, recommended not eligible for listing in the IRHSS and/or NRHP. No further archaeological investigations are warranted. Additionally, the DHPA SHAARD did not indicate the presence of any above ground historic structures that would be eligible for inclusion in the NRHP.

An Additional Investigation (AI) was required due to changes in the scope consisting of newly added storm sewer and grading work extend from West State Blvd. to the Lowther-Neuhaus Ditch, covering an additional 0.21 acre. W&A completed the fieldwork on May 1, 2024, concluding no archaeological sites are within the additional project area. The AI was submitted on December 30, 2024 and approved by INDOT CRO on December 31, 2024 (Appendix D, pages D14 to D15).

No further consultation is required. 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

	Presence	Use	
Parks and Other Recreational Land		Yes	No
Publicly owned park			
Publicly owned recreation area			
Other (school, state/national forest, bikeway, etc.)			
Wildlife and Waterfowl Refuges			
National Wildlife Refuge			
National Natural Landmark			
State Wildlife Area			
State Nature Preserve			
Historic Properties			
Site eligible and/or listed on the NRHP			

	Evaluations Prepared
Programmatic Section 4(f)	
"De minimis" Impact	
Individual Section 4(f)	
Any exception included in 23 CFR 774.13	

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.

Presence, no impact, no use

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 National Register of Historic Places (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, page B3), and the RFI report (Appendix E, pages E1 to E16), there are four potential 4(f) resources located within the 0.5-mile search radius. According to the site visit on May 15, 2024, by GAI, there is one 4(f) resource located within or adjacent to the project area. The potential trail segment is located on the east side of Hillegas Rd. from Coliseum Blvd. to State Blvd. No impact is expected as the potential trail is a part of the proposed work for this project. The project will not use this resource by taking permanent right of way and will not indirectly use the resource in such a way that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. Therefore, no 4(f) use is expected.

Section 6(f) Involvement	Presence	Use	
		Yes	No
Section 6(f) Property			

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.

No presence or presence, no impact

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

A review of 6(f) properties on the INDOT ESD website revealed a total of 30 properties in Allen County (Appendix I, page I1). 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	Yes	No
Is the project in the most current STIP/TIP?	X	
Is the project located in an MPO Area?	X	
Is the project in an air quality non-attainment or maintenance area?		X
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)?	X	
Is a hot spot analysis required (CO/PM)?		X

Location in STIP: STIP 2026-2030 NIRCC

Name of MPO (if applicable): NIRCC

Location in TIP (if applicable): Under Lead Des 1901705

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.

Standalone Project or Lead DES number
This project is included in the Fiscal Year (FY) 2024-2028 NIRCC Transportation Improvement Plan (TIP) which has been directly incorporated into the FY 2024-2028 STIP (Appendix H, page H1 to H10).

Attainment area
This project is located in Allen County, which is currently in attainment for all criteria pollutants according to https://www.in.gov/idem/sips/files/nonattainment_areas_map.pdf. Therefore, the conformity procedures of 40 CFR Part 93 do not apply.

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

SECTION G - NOISE

Noise	Yes	No
Is a noise analysis required in accordance with FHWA regulations and INDOT's traffic noise policy?	X	

Date Noise Analysis was approved/technically sufficient by INDOT ESD: November 1, 2022

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.

Type 1 Project, no abatement

This is a Type I project. A noise analysis was required and has been completed by Hanson Professional Services, Inc. in accordance with FHWA and INDOT guidelines. The Noise Analysis Report (Appendix I, pages I12 to I67) was submitted to INDOT on September 29, 2022. INDOT reviewed the Noise Analysis Report and found it to be technically sufficient and that the study has been completed in accordance with federal guidelines and state policy on November 1, 2022.

- Receptors and Noise Abatement Categories:
  A total of 52 receptors were identified within the 500-foot buffer of the project area. These receptors were grouped into 8 Common Noise Environments (CNEs) and include land uses in Noise Abatement Categories B and C/D, representing residential areas, a church, and a medical facility with an outdoor playground.
- Existing and Future Noise Levels:
  Existing (2022) noise levels ranged from 50.0 to 67.4 dB(A). Predicted future design year 2045 no-build noise levels for the 52 receptors ranged from 52.6 to 70.4 dB(A). Predicted future noise levels for the design year (2045) under the build scenario ranged from 52.6 to 70.4 dB(A).
- Impacted Receptors:
  Of the 52 receptors analyzed, 10 receptors were predicted to approach or exceed the Noise Abatement Criteria (NAC) under the 2045 build scenario. No receptors were found to experience a substantial increase (15 dB(A) or more) over existing conditions.
- Statement of Likelihood:
  Based on the studies thus far accomplished, no locations were identified where noise abatement is likely. Noise abatement at these locations is based upon preliminary design costs and design criteria. Noise abatement has not been found to be feasible based on the presence of numerous driveways and side road access points along Hillegas Rd., which prevent the construction of uninterrupted noise barriers. Additionally, barriers in these locations would pose sight distance safety issues for motorists. A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is feasible and reasonable, the abatement measures might be provided. The final decision on the installation of any abatement measure(s) will be made upon the completion of the project's final design and the public involvement processes.

SECTION H – COMMUNITY IMPACTS

Regional, Community & Neighborhood Factors	Yes	No
Will the proposed action comply with the local/regional development patterns for the area?	X	
Will the proposed action result in substantial impacts to community cohesion?		X
Will the proposed action result in substantial impacts to local tax base or property values?		X
Will construction activities impact community events (festivals, fairs, etc.)?		X
Does the community have an approved transition plan?	X	
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)	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.

There may be temporary inconveniences associated with construction such as increased travel times, possible construction noise and fugitive dust. There will be no substantial impacts on community cohesion or property values because of the project.

Furthermore, no permanent or temporary economic effects are expected to result from the project. Acquisition of the additional right-of-way would not appreciably affect the property tax base of Allen County. A review of https://www.fairsandfestivals.net/ an online resource for local fairs and festivals, there are no scheduled festivals or other public events that will be impacted as a result of the project.

Allen County has an ADA Transition Plan. There are no existing sidewalks or other pedestrian facilities adjacent to the project area or within the project limits. The proposed project anticipates a 10-foot-wide trail that will be added on the east side of Hillegas Rd. and a five-foot-wide sidewalk on the west side. In addition, ADA curb ramps will be installed at all intersections.

Public Facilities and Services

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

Presence, no impact

Based on a desktop review, the aerial map of the project area (Appendix B, page B3), and the RFI report (Appendix E, pages E1 to E16), there is one Religious Facility located within the 0.5 mile of the project. There is one airport located within the 0.5 mile of the project. There is one recreational facility located within the 0.5 mile of the project. There are three trails located within the 0.5 mile of the project area. There are two public facilities within or adjacent to the project area. That number was confirmed by the site visit on May 15, 2024 by GAI. The Three Rivers Wesleyan Church, located at 2825 Hillegas Rd., is adjacent to the west side of the project area 0.05 mile south of Butler Rd. Coordination with Three River Wesleyan Church occurred. No response was received. The proposed project will have no direct or indirect impacts. One potential trail is located on the east side of Hillegas Rd from Coliseum Blvd. to State Blvd. Coordination with City of Fort Wayne Public Works and City of Fort Wayne Greenways Manager occurred. No response was received. The proposed trail is part of the proposed project. Therefore, no impacts are expected. Access to all properties will be maintained during construction.

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.

The INDOT Office of Aviation responded to early coordination on July 30, 2025 that the project site at its closest location is roughly 13,300 ft from the nearest public-use airport. If any structure or equipment, temporary or permanent is taller than 200 feet please follow up with our office.

Relocation of People, Businesses or Farms	**Yes**	**No**
Will the proposed action result in the relocation of people, businesses or farms?		X
Is a BIS or CSRS required?		X

Number of relocations: Residences: 0 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.

No Relocations

No relocations of people, businesses, or farms will take place as a result of this project.

SECTION I – HAZARDOUS MATERIALS & REGULATED SUBSTANCES

Hazardous Materials & Regulated Substances (Mark all that apply)	**Documentation**
Red Flag Investigation (RFI)	X
Phase I Environmental Site Assessment (Phase I ESA)	
Phase II Environmental Site Assessment (Phase II ESA)	
Design/Specifications for Remediation required?	

Date RFI concurrence by INDOT SAM (if applicable): 11/4/2022 and 4/5/2024

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.

Presence, no impact

Based on a review of GIS and available public records, the RFI was completed on October 27, 2022, by NIRCC and INDOT SAM provided their concurrence on November 4, 2022, (Appendix E, Pages E1 to E16). An RFI Addendum was completed February 6, 2024, and INDOT SAM approved on April 5, 2024. Two Resource Conservation and Recovery Act (RCRA) Generator/Treatment, Storage, and Disposal (TSD) are located within 0.5 mile of the project area. 10 Underground Storage Tank (UST) sites are located within 0.5 mile of the project area. Two Voluntary Remediation Program are located within 0.5 mile of the project area. Five Leaking Underground Storage (LUST) sites are located within 0.5 mile of the project area. One brownfield is located within 0.5 mile of the project area. Two institutional controls are within 0.5 mile of the project area. 10 National Pollutant Discharge Elimination System (NPDES) are within 0.5 mile of the project area. One NPDES pipe location is within 0.5 mile of the project area. None of the hazmat sites identified will impact the project. Further investigation for hazardous material concerns is not required at this time.

Part IV – Permits and Commitments

PERMITS CHECKLIST

Permits (mark all that apply)	**Likely Required**
Army Corps of Engineers (404/Section10 Permit)	
Nationwide Permit (NWP)	X
Regional General Permit (RGP)	
Individual Permit (IP)	
Other	
IN Department of Environmental Management (401/Rule 5)	
Nationwide Permit (NWP)	
Regional General Permit (RGP)	
Individual Permit (IP)	X
Isolated Wetlands	
Rule 5	X
Other	
IN Department of Natural Resources	
Construction in a Floodway	
Navigable Waterway Permit	
Other	
Mitigation Required	X
US Coast Guard Section 9 Bridge Permit	
Others (Please discuss in the discussion below)	

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

An Individual Section 401 Water Quality Certification and Section 404 Nationwide permit are anticipated for impacts to waterways below the ordinary high water mark. Due to the amount of stream impacts, it is anticipated that mitigation will be required. A Construction Stormwater General Permit (CSGP), previously known as Rule 5, will likely be required for ground disturbance in excess of 1 acre.

The IDNR-DFW responded to early coordination on January 31, 2022 (Appendix C, pages C10 to C14), stating that this project may require formal approval for any proposal to construct, excavate, or fill the floodway of a stream which has a drainage area greater than one square mile. None of the identified streams within the project area have a drainage area at or greater than one square mile, therefore, the project is exempt from permitting under the Flood Control Act (IC 14-28-1) for the Construction in a Floodway Permit.

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.

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 Fort Wayne District).
2. It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access (INDOT ESD).
3. Best management practices (BMPs) will be used to avoid further degradation of the stream to address the IBC. (INDOT ESD).
4. 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. (INDOT ESD).
5. UNT 1 will be labeled as “Environmentally Sensitive Area – Do Not Disturb) on the project plans.” (INDOT ESD).
6. Prior to the start of nesting season (May 1) all structures 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” RSP. (INDOT ESD)
7. Upon completion of the environmental document phase, the noise study will be provided directly to the county’s planning unit by the environmental preparer and/or member of the project team. If the project is in a municipality that has a planning unit, a noise study will also be provided to the municipality’s planning unit. INDOT Environmental Services Division shall be copied on this correspondence. (INDOT ESD)
8. The NPDES Facility named “Finnegan’s Playground Indoor Dog Park”, permit number INRA06772 is located at 3232 Hillegas Rd. The permit was issued on 12/29/2020 and expires 12/29/2025. Coordination with Finnegan’s Playground Indoor Dog Park will occur. (INDOT SAM)
9. The NPDES Facility named “Zurcher Tire New Warehouse”, permit number INRA10457 is located at 3414 Hillegas Rd. The permit was issued on 9/6/2022 and expires 9/5/2027. Coordination with Zurcher Tire New Warehouse will occur. (INDOT SAM)
10. If any structure or equipment, temporary or permanent is taller than 200 feet, the INDOT Office of Aviation will be contacted (INDOT Aviation)
11. USFWS Bridge/Structure Assessment shall take place no earlier than two (2) years prior to the start of construction. If construction will begin after May 22, 2028, an inspection of the structure by a qualified individual, must be performed. Inspection of the structure should check for presence of bats/bat indicators and/or presence of birds. The results of the inspection must indicate no signs of bats or birds. If signs of bats or birds are documented during this inspection, the INDOT District Environmental Manager must be contacted immediately. (INDOT ESD)

12. GAMM1: Ensure all operators, employees, and contractors working in areas of Indiana bat, NLEB, or TCB suitable habitat are aware of all Transportation Agency environmental commitments, including all applicable AMMs (USFWS).
13. LAMM1: Direct temporary lighting away from suitable habitat during the active season (USFWS).
14. LAMM2:When installing new/additional permanent lighting or replacing existing permanent lights, use downward-facing, full cut-off lens lights (with same intensity or less for replacement lighting); or for those Transportation Agencies using the Backlight Uplight and Glare (BUG) system developed by the Illuminating Engineering Society, the project should be as close to 0 for all three ratings with a priority of "uplight" of 0 and "backlight" as low as practicable. http://www.escolighting.com/PDFfiles/BUG_rating.pdf (USFWS).
15. TRTAMM1: Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to the extent to avoid tree removal/trimming in excess of what is required to implement the project safely (USFWS).
16. TRTAMM2: Ensure tree removal/trimming 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 removal/trimming to ensure contractors stay within clearing limits (USFWS).
17. TRTAMM4: Avoid conducting tree removal/trimming outside documented habitat for the Indiana bat, NLEB, or TCB beyond 100 ft of the road/rail surface during the pup season (USFWS).
18. A “Reinitiation Notice” is required if the project removes more than 0.27 acre(s) of suitable habitat for the Indiana bat or NLEB beyond 100 feet from the edge of pavement, or the individual project takes more than 5 Indiana bats or 5 NLEBs resulting from bridge, culvert, or structure activity (USFWS).
19. The INDOT Project Manager will assure that $5,634.09 of Preliminary Engineering funds will be allocated to the Rangewide In-Lieu Fee Program, administered by The Conservation Fund, to resolve formal consultation under the Rangewide Programmatic Agreement (0.27 acre X 1.75 x $11,924 = $5,634.09). Payment shall be in process for Ready for Contracts (RFC) date (USFWS).

For Further Consideration:

1. Do not excavate in the low flow area except for the placement of piers, foundations, and riprap, or removal of the old structure. (IDNR-DFW).
1. Do not construct any temporary runarounds, access bridges, causeways, cofferdams, diversions, or pumparounds (IDNR-DFW).
2. Use minimum average 6 inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids (IDNR-DFW).
3. If erosion control blankets are used, use heavy-duty, biodegradable, and net free or loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (IDNR-DFW).
4. Do not cut any trees suitable for Indiana bat or Northern Long-eared bat roosting from April 1 through September 30 (IDNR-DFW).
5. The new, replacement, or rehabbed structure should not create conditions that are less favorable for wildlife passage under the structure compared to the current conditions (IDNR-DFW).
6. For crossing replacements, the new structure must include wildlife passage appropriate for the type of replacement structure being proposed. If the replacement structure is sized to accommodate white-tailed deer passage then it should be included in the design of the new structure. If white-tailed deer passage is not possible with the existing structure, deer passage still needs to be considered in the design and at minimum the bank lines must be restored within structures to allow for smaller wildlife passage above the ordinary high water mark. All wildlife passage designs must include a smooth level pathway a minimum of 1-2 feet in width composed of natural substrate (soil, sand, gravel, etc.) or compacted aggregate fill over riprap (#2, #53, #73, etc.) tied into existing elevations both upstream and downstream. Stream crossing repairs or modifications, and any bank stabilization under or around the structure, must not create conditions that are less favorable for wildlife passage when compared to existing conditions. Upgrading wildlife passage for rehabilitated/modified structures is encouraged whenever possible to improve wildlife/vehicle safety (IDNR-DFW).
7. 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 inches dbh or greater (5:1 mitigation based on the number of large trees) (IDNR-DFW).
8. Do not excavate in the low flow area except for the placement of piers, foundations, and riprap, or removal of the old structure (USFWS).
9. Use minimum average 6-inch graded riprap stone extended below the normal water level to provide habitat for aquatic organisms in the voids (USFWS).