

Recreation in the project folder and checked emails and could not locate a response on the project. Given there is an LWCF site, Prophetstown State Park, within half a mile of the project area, we wanted to ensure your agency had an opportunity to respond and include that response in the environmental document.

If a response was sent, could you forward that to my email? If not, please see the attached file with the Early Coordination project information. If you have specific questions about the project, please feel free to reach out.

Anything you can do to expedite your review and response would be appreciated.

Thank you,

**RAQUEL WALKER**

Senior Analyst

Environmental Services

o: 317-558-7546

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## United States Department of the Interior Fish and Wildlife Service



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

June 16, 2023

Ms. Raquel Walker  
Beam, Longest and Neff, LLC  
c/o Indiana Department of Transportation  
100 North Senate Avenue, Room N758-ES  
Indianapolis, Indiana 46204-2219

Project No.: Des. 2002077  
Project: SR 225 over Wabash River Bridge Rehabilitation  
Location: Tippecanoe County

Dear Ms. Walker:

This responds to your letter dated June 12, 2023, requesting our comments on the aforementioned project's likely impacts on the Federally endangered fanshell mussel (*Cyprogenia stegaria*) and threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*).

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

The proposed project consists of the rehabilitation of the historically significant four-span, 646-foot-long SR 225 bridge over the Wabash River. In addition to the structural repair of the steel bridge, the concrete piers and abutments will be patched as needed. Riprap will be placed in the river around Piers 2 and 4 and at the two abutments; pier 3 is on Goose Island and not within the water, so no riprap is required. It is anticipated that the riprap will be installed around the two piers from a barge in the river; therefore, no temporary causeways or work bridges are planned at this time. Permanent instream impacts from the riprap are expected to be about 66.0 linear feet and 0.14 acre.

## ENDANGERED SPECIES

The proposed project is within the range of the Federally endangered Indiana bat (*Myotis sodalis*), northern long-eared bat (*Myotis septentrionalis*), and fanshell mussel (*Cyprogenia stegaria*) and threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*). The impacts on the 2 bat species were evaluated utilizing the Section 7 Range-wide Programmatic Consultation process.

The two mussel species are known within the Wabash River. Therefore, protecting water quality is vital for the conservation of these species. We have reviewed the information provided in the letter and the proposed Avoidance and Minimization Measures; we believe the proposed AMMs will adequately protect fanshell and rabbitsfoot mussels, as well as the numerous Wabash River mussel species listed by the Indiana Department of Natural Resources. Therefore, we concur with the determination that the proposed project is not likely to adversely affect these endangered and threatened species with the AMMs in place.

This precludes the need for further consultation on this project for the fanshell and rabbitsfoot mussels as required under Section 7 of the Endangered Species Act of 1973, as amended. However, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinstate consultation.

We appreciate the opportunity to comment on this proposed project. For further discussion, please contact Elizabeth McCloskey at [elizabeth\\_mccloskey@fws.gov](mailto:elizabeth_mccloskey@fws.gov).

Sincerely yours,

/s/ *Elizabeth S. McCloskey*

for Susan E. Cooper  
Supervisor

Sent via email June 16, 2023; no hard copy to follow.





June 12, 2023

Elizabeth McCloskey  
U.S. Fish and Wildlife Service  
Northern IN Field Office  
Chesterton, Indiana 46304

Re: Standard Consultation for the federally endangered fanshell mussel (*Cyprogenia stegaria*) and the federally threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*)

Des. No. 2002077

Bridge Rehabilitation on SR 225 over Wabash River, 0.60 mile north of Old SR 25, Tippecanoe County, Indiana

Dear Ms. McCloskey:

The Indiana Department of Transportation (INDOT), acting on behalf of Federal Highway Administration (FHWA), is submitting this letter for standard consultation for the federally endangered fanshell mussel (*Cyprogenia stegaria*) and the federally threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*). This project does not qualify for the current USFWS Interim Policy due to impacts on the Wabash River.

### **Existing Conditions**

This project is located on SR 225 over Wabash River, 0.60 mile north of Old SR 25, Tippecanoe County, Indiana. Specifically, the project is located in Section 25 and Brummett's Reserve Section 6, Township 24 North, Range 4 West, as shown on the Lafayette East 7.5 Minute U.S. Geological Survey Topographic Map in Tippecanoe Township. Refer to Attachments 1 through 3 for project location graphics.

Bridge No. 225-79-04016 (National Bridge Inventory (NBI): 029150) is a four-span, steel, Pratt truss bridge constructed in 1912 and has undergone multiple repairs between 1954 and 2014. The existing structure is approximately 646 feet long with a clear roadway width of approximately 14.4 feet (single-lane) and an out-to-out deck width of approximately 15.9 feet. This structure has been identified as a "Select" bridge eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion C for its engineering significance. The structure is experiencing cracking, leaching, and spalling with up to 17% delamination per span. There is also widespread deterioration of truss members and gusset plates due to existing curbs not being able to protect the truss members from roadway runoff. In addition, a substantial number of the truss and superstructure members do not have a load capacity meeting the Indiana Design Manual (IDM) requirement.

### **Proposed Improvements**

The preferred alternative consists of rehabilitation of the existing bridge for continued vehicular use (two-way option) meeting the Secretary of the Interiors Standards for rehabilitation. This alternative



includes the rehabilitation of the existing bridge to current INDOT and FHWA criteria for structural capacity and safety features. The bridge clear roadway width will not be improved with this alternative. Although the existing bridge is a one-lane bridge, which is considered sub-standard, it is acceptable to allow the bridge to stay as a one-lane bridge since SR 225 experiences low-to-moderate traffic. In addition, it is not possible to widen the existing historic bridge and the existing bridge has acceptable performance in its current configuration. The scope of work for the rehabilitation will include:

- Remove and replace all floor beams
- Remove, store, and reuse the existing stringers
- Remove and replace the bridge deck
- Remove and replace the existing bridge railing
- Replace full members and gusset plates as needed
- Patch damaged portions of the piers and abutments
- Clean and paint the structural steel and color-match it to the existing floor system and truss
- Placement of riprap along Pier No. 2 and Pier No. 4

It is anticipated that 0.23 acre of temporary right-of-way will be needed for this project. Construction is anticipated to begin in Fall 2024 and will last approximately 18 months.

### **Coordination Completed**

Indiana Department of Natural Resources, Division of Fish and Wildlife (IDNR-DFW) responded to the early coordination letter on August 10, 2022. A 0.5 mile review of the Natural Heritage Database identified Prophetstown State Park, a Land and Water Conservation Fund (LWCF) property, is located within a half mile of the project area, and the following mussel species have been documented within a half mile:

1. Snuffbox (*Epioblasma triquetra*), federal & state endangered
2. Rayed Bean (*Villosa fabalis*), federal & state endangered
3. Fanshell (*Cyprogenia stegaria*), federal & state endangered
4. Clubshell (*Pleurobema clava*), federal & state endangered
5. Northern riffleshell (*Epioblasma rangiana*), federal & state endangered
6. Rough Pigtoe (*Pleurobema plenum*), federal & state endangered
7. Round hickorynut (*Obovaria subrotunda*) state endangered
8. Ohio Pigtoe (*Pleurobema cordatum*), state special concern
9. Wavyrayed lampmussel (*Lampsilis fasciola*), state special concern
10. Black sandshell (*Ligumia recta*), state special concern
11. Pyramid Pigtoe (*Pleurobema rubrum*), state extirpated
12. Tubercled Blossom (*Epioblasma torulosa*), state extirpated
13. Longsolid (*Fusconaia subrotunda*), state extirpated
14. White Wartyback (*Plethobasus cicatricosus*), state extirpated
15. Ring Pink (*Obovaria retusa*), state extirpated

The IDNR-DFW stated “There are mussels throughout this stretch of the Wabash River (20+ species). Most are common species, but a few are more rare species. It is unclear in the information provided what kind of in-stream disturbance might take place or if any causeway(s) will be used. If there will be no in-stream disturbance, then impacts to mussel species should be minimal as long as standard erosion control measures are implemented. However, if there is any work in the stream proposed, and



especially any causeways, IDNR-DFW recommended further coordination regarding potential mussel species impacts”.

The IDNR-DFW response also included several other recommendations for reducing impacts of the project. Applicable recommendations will be included as commitments in the environmental document. Additional coordination occurred with the IDNR-DFW on May 24, 2023, but no additional response has been received yet. Refer to Attachment 4 for the initial IDNR-DFW response.

The U.S Fish and Wildlife Service (USFWS) did not respond to the initial early coordination letter. However, a follow-up email was sent on May 23, 2023, requesting their response since full coordination with the agency is required since this project does not qualify for the interim policy. The USFWS responded on May 25, 2023 stating a letter must be sent regarding the mussels because it cannot currently be completed through the Information for Planning and Consultation (IPaC) website. They also stated that their agency does not have any mussel records at or near the subject bridge, but they are downstream several miles, so protecting water quality in the river is important.

An IPaC species list was generated on January 23, 2022. In addition to the Indiana bat (*Myotis sodalis*) and Northern Long-eared bat (*Myotis septentrionalis*), the species discussed above were listed in the IPaC species list (Attachment 6).

### **Existing Habitat and Assessment of Suitable Habitat**

The Wabash River is a perennial stream feature that runs east to west through the project area. The surrounding riparian area includes wooded riparian habitat and row crops. There are 130 linear feet of the Wabash River within the project area. The Wabash River is a traditional navigable waterway (TNW) and is, therefore, a Waters of the U.S.

Suitable summer bat habitat is present along each side of the riverbanks and below the bridge in the channel on Goose Island. No work will occur on Goose Island as a result of this project.

### **Impacts**

This project will result in approximately 66.0 linear feet and 0.14 acre of permanent impacts to the Wabash River for the placement of Class 1 riprap for scour protection around Piers 2 and 4. No temporary impacts will occur as the riprap is anticipated to be placed via barge. Approximately 0.76 acre of terrestrial disturbance will be necessary to facilitate the proposed bridge project and roadway improvements. With this, approximately 0.18 acre of tree clearing will occur. Temporary lighting may be required during construction, but no permanent lighting will be needed. Class 1 riprap for scour protection will be placed around Piers 2 and 4. Approximately, 66 linear feet and 0.26 acre of impacts will occur to the Wabash River due to the placement of the riprap. Refer to the plan sheets in Attachment 7 for details.

### **Commitments**

The following commitments are proposed as Avoidance and Minimization Measures (AMMs) to reduce potential impacts to federally endangered fanshell mussel (*Cyprogenia stegaria*) and the federally threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*).

1. Strict erosion control measures will be needed at the site during construction.

2. No pollutants of any kind can enter the waterway due to this project. This includes spilling of petroleum products or other chemicals from the machinery/equipment being used, as well as any chemical-based material associated with demolition and construction.
3. Emergency response equipment and spill containment materials must be maintained at the project site, and a contained fueling and fuel storage area needs to be designated at least 150 feet away from the Wabash River.

### **Conclusion**

Based on the review of existing data, assessment of the existing habitats, and applied commitments, the FHWA has determined the proposed project has an effect finding of “May Affect – Not Likely to Adversely Affect” for the federally endangered fanshell mussel (*Cyprogenia stegaria*) and the federally threatened rabbitsfoot mussel (*Quadrula cylindrica cylindrica*).

The FHWA is requesting USFWS concurrence with this project “May Affect – Not Likely to Adversely Affect” determination.

Please contact Raquel Walker, Beam, Longest and Neff, LLC if you have any questions or require additional information. We appreciate your attention to this project.

Prepared By:

Raquel Walker  
Senior Environmental Analyst  
Beam, Longest, and Neff, LLC  
[rwalker@b-l-n.com](mailto:rwalker@b-l-n.com)

### **Attachments:**

Project Graphics  
IDNR-DFW Early Coordination Response  
USFWS Response  
IPaC Species List  
Select Project Plan Sheets

**Attachments have been removed to avoid duplication and can be found in Appendix B & C.**





## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Indiana Ecological Services Field Office  
620 South Walker Street  
Bloomington, IN 47403-2121  
Phone: (812) 334-4261 Fax: (812) 334-4273

In Reply Refer To:

June 19, 2023

Project Code: 2023-0036872

Project Name: Des 2002077, Bridge Rehabilitation Project on SR 225 over the Wabash River in Tippecanoe County

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

### To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

Please use the species list provided and visit the U.S. Fish and Wildlife Service's Region 3 Section 7 Technical Assistance website at - <http://www.fws.gov/midwest/endangered/section7/>

<s7process/index.html>. This website contains step-by-step instructions which will help you determine if your project will have an adverse effect on listed species and will help lead you through the Section 7 process. For all **wind energy projects and projects that include installing towers that use guy wires or are over 200 feet in height**, please contact this field office directly for assistance, even if no federally listed plants, animals or critical habitat are present within your proposed project or may be affected by your proposed project.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of

Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. **Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.**

Attachment(s):

- Official Species List
- Migratory Birds
- Wetlands



## **OFFICIAL SPECIES LIST**

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

This species list is provided by:

**Indiana Ecological Services Field Office**

620 South Walker Street

Bloomington, IN 47403-2121

(812) 334-4261

## PROJECT SUMMARY

**Project Code:** 2023-0036872  
**Project Name:** Des 2002077, Bridge Rehabilitation Project on SR 225 over the Wabash River in Tippecanoe County  
**Project Type:** Bridge - Maintenance  
**Project Description:** The Indiana Department of Transportation (INDOT) has identified the need to address the deteriorated condition of a bridge on State Road (SR) 225 over the Wabash River. The project is located 0.60 mile north of Old SR 25. The project is in Section 25, Township 24 North, Range 4 West, as shown on the Lafayette East 7.5- Minutes US Geological Survey (USGS) Topographic Map.

The existing structure (225-79-04016-G/NBI: 029150) is a four-span, steel, Pratt truss bridge that is approximately 646 feet long and approximately 15 feet, 11 inches wide. Constructed in 1912, it has undergone multiple repairs between 1954 and 2014; however, it has retained the integrity necessary to convey its significance and has been identified as a “Select” bridge in the State of Indiana and is identified as eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion C. The bridge was inspected by INDOT on October 13, 2021, and was found to have cracking, leaching, and spalling with up to 17% delamination per span. There is also widespread deterioration of truss members and gusset plates due to existing curbs not being able to protect the truss members from roadway runoff. In addition, 161 of the truss and superstructure members do not have a load capacity meeting the Indiana Design Manual (IDM) requirement. The deck, wearing surface, superstructure and substructure have a poor condition rating (4 out of 9). The purpose of the proposed project is to improve portions of the bridge as required to increase the load capacity to meet an HS-15 loading and to protect members at risk of future deterioration.

The proposed project will include the replacement of truss members, gusset plates, and deck, a new railing will be constructed, and the substructure units will be patched to repair damaged piers and abutments. Revetment riprap on geotextiles will be placed around the wingwalls. The new structural steel will be color-matched to the existing floor system and truss. Class 1 Riprap will be placed around Piers 1 and 4. Riprap drainage turnouts will be constructed at all four corners of the bridge, and wildlife crossings composed of compacted No. 53 stone will be installed against both abutments.

Suitable summer habitat is within the project area, and approximately 0.18 acre of tree clearing will occur. Tree species within the project area include hackberry (*Celtis occidentalis*), eastern white pine (*Pinus strobus*),

black walnut (*Juglans nigra*), silver maple (*Acer saccharinum*), and American basswood (*Tilia americana*). A review of the USFWS database that was conducted by INDOT, Crawfordsville district staff on February 8, 2022, did not indicate the presence of endangered bat species within 0.5-mile of the project area. A bat inspection was conducted by BLN staff on August 17, 2022, and the results indicated no evidence of bats. All tree clearing will occur during the inactive season. Construction is anticipated to begin in Spring of 2024.

Structure #225-79-04016-G has shown evidence of use (i.e. nests) by a bird species protected under the Migratory Bird Treaty Act (MBTA) during the 12/08/20 inspection. Avoidance and minimization measures will be implemented prior to the start of and during the nesting season. Details of the required procedures are outlined in the “107-C-273 Migratory Bird Protection” RSP. It is likely that work will occur in the waterway and permits will be required in order to access the bridge for construction and to install the scour countermeasures.

The maintenance of traffic (MOT) plan for the project will involve a full closure with a detour utilizing Interstate (I) 65. The detour will be approximately 10 miles in length. It is anticipated that 0.5 acre of permanent right-of-way (ROW) and 0.2 acre of temporary ROW will be required. Temporary lighting may be used during construction; however, no permanent lighting will be necessary.

**Project Location:**

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.4957472,-86.82377137607929,14z>



Counties: Tippecanoe County, Indiana



## ENDANGERED SPECIES ACT SPECIES

There is a total of 7 threatened, endangered, or candidate species on this species list.

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

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

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

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

### MAMMALS

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a>	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Endangered
Tricolored Bat <i>Perimyotis subflavus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/10515">https://ecos.fws.gov/ecp/species/10515</a>	Proposed Endangered

### BIRDS

NAME	STATUS
Whooping Crane <i>Grus americana</i> Population: U.S.A. (AL, AR, CO, FL, GA, ID, IL, IN, IA, KY, LA, MI, MN, MS, MO, NC, NM, OH, SC, TN, UT, VA, WI, WV, western half of WY) No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/758">https://ecos.fws.gov/ecp/species/758</a>	Experimental Population, Non- Essential

**CLAMS**

NAME	STATUS
Fanshell <i>Cyprogenia stegaria</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/4822">https://ecos.fws.gov/ecp/species/4822</a>	Endangered
Rabbitsfoot <i>Quadrula cylindrica cylindrica</i> There is <b>final</b> critical habitat for this species. Your location does not overlap the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5165">https://ecos.fws.gov/ecp/species/5165</a>	Threatened

**INSECTS**

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

**CRITICAL HABITATS**

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

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

## MIGRATORY BIRDS

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

- 
1. The [Migratory Birds Treaty Act](#) of 1918.
  2. The [Bald and Golden Eagle Protection Act](#) of 1940.
  3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

**The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern \(BCC\) list](#) or warrant special attention in your project location.** To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
American Golden-plover <i>Pluvialis dominica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.	Breeds Oct 15 to Aug 31



NAME	BREEDING SEASON
<b>Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9399">https://ecos.fws.gov/ecp/species/9399</a>	Breeds May 15 to Oct 10
<b>Bobolink <i>Dolichonyx oryzivorus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 20 to Jul 31
<b>Cerulean Warbler <i>Dendroica cerulea</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/2974">https://ecos.fws.gov/ecp/species/2974</a>	Breeds Apr 21 to Jul 20
<b>Chimney Swift <i>Chaetura pelagica</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 25
<b>Eastern Whip-poor-will <i>Antrostomus vociferus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Aug 20
<b>Golden Eagle <i>Aquila chrysaetos</i></b> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. <a href="https://ecos.fws.gov/ecp/species/1680">https://ecos.fws.gov/ecp/species/1680</a>	Breeds elsewhere
<b>Henslow's Sparrow <i>Ammodramus henslowii</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/3941">https://ecos.fws.gov/ecp/species/3941</a>	Breeds May 1 to Aug 31
<b>Kentucky Warbler <i>Oporornis formosus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 20
<b>Lesser Yellowlegs <i>Tringa flavipes</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9679">https://ecos.fws.gov/ecp/species/9679</a>	Breeds elsewhere
<b>Prothonotary Warbler <i>Protonotaria citrea</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Jul 31
<b>Red-headed Woodpecker <i>Melanerpes erythrocephalus</i></b> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10

NAME	BREEDING SEASON
<b>Rusty Blackbird</b> <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds elsewhere
<b>Wood Thrush</b> <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

## PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

### Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

**Survey Effort (|)**

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

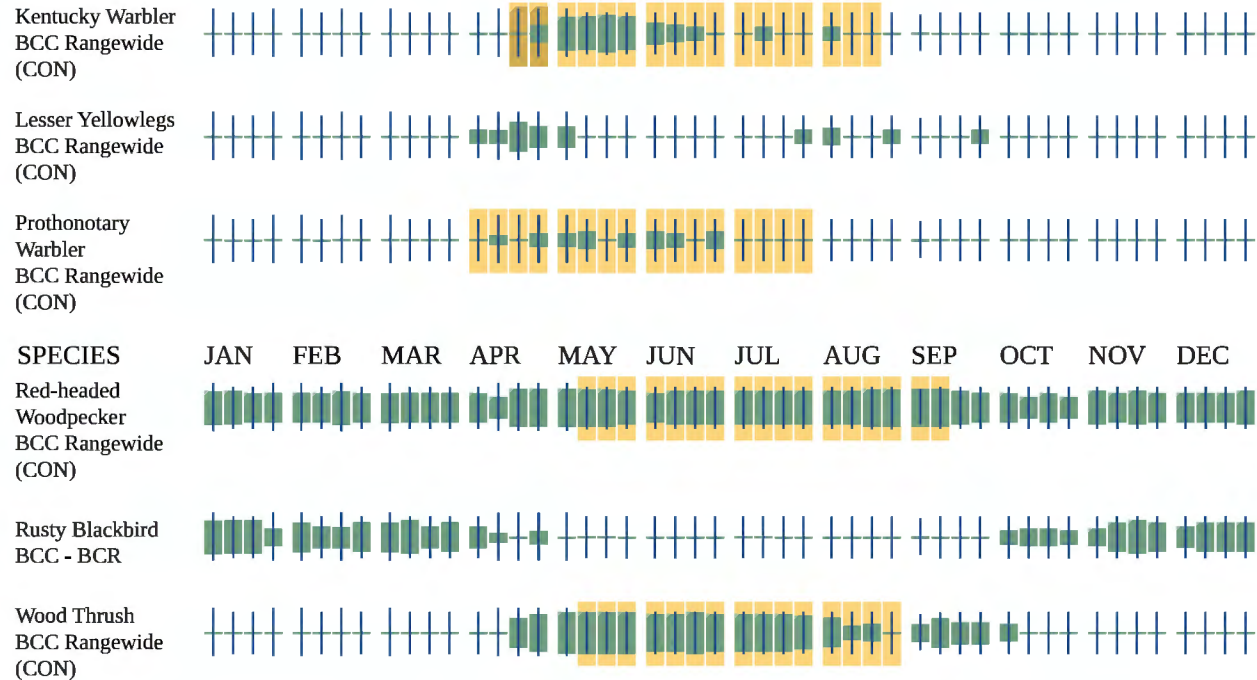
**No Data (-)**

A week is marked as having no data if there were no survey events for that week.

**Survey Timeframe**

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.





Additional information can be found using the following links:

- Birds of Conservation Concern <https://www.fws.gov/program/migratory-birds/species>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide conservation measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>

## MIGRATORY BIRDS FAQ

**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.



The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [Rapid Avian Information Locator \(RAIL\) Tool](#).

### **What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### **How do I know if a bird is breeding, wintering or migrating in my area?**

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the [RAIL Tool](#) and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### **What are the levels of concern for migratory birds?**

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### **Details about birds that are potentially affected by offshore projects**

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### **What if I have eagles on my list?**

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### **Proper Interpretation and Use of Your Migratory Bird Report**

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

### FRESHWATER FORESTED/SHRUB WETLAND

- [PFO1C](#)

### RIVERINE

- [R2UBH](#)



## **IPAC USER CONTACT INFORMATION**

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## **LEAD AGENCY CONTACT INFORMATION**

Lead Agency: Indiana Department of Transportation



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Indiana Ecological Services Field Office  
620 South Walker Street  
Bloomington, IN 47403-2121  
Phone: (812) 334-4261 Fax: (812) 334-4273

In Reply Refer To:

June 21, 2023

Project code: 2023-0036872

Project Name: Des 2002077, Bridge Rehabilitation Project on SR 225 over the Wabash River in Tippecanoe County

Subject: Concurrence verification letter for the 'Des 2002077, Bridge Rehabilitation Project on SR 225 over the Wabash River in Tippecanoe County' project under the amended February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion (dated March 23, 2023) for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat (NLEB).

To whom it may concern:

The U.S. Fish and Wildlife Service (Service) has received your request dated June 21, 2023 to verify that the **Des 2002077, Bridge Rehabilitation Project on SR 225 over the Wabash River in Tippecanoe County** (Proposed Action) may rely on the concurrence provided in the amended February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion (dated March 23, 2023) for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat (PBO) to satisfy requirements under Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 *et seq.*).

Based on the information you provided (Project Description shown below), you have determined that the Proposed Action is within the scope and adheres to the criteria of the PBO, including the adoption of applicable avoidance and minimization measures, and may affect, but is not likely to adversely affect (NLAA) the endangered Indiana bat (*Myotis sodalis*) and/or the endangered northern long-eared bat (*Myotis septentrionalis*). Consultation with the Service pursuant to section 7(a)(2) of ESA (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*) is required.

The Service has 14 calendar days to notify the lead Federal action agency or designated non-federal representative if we determine that the Proposed Action does not meet the criteria for a NLAA determination under the PBO. If we do not notify the lead Federal action agency or designated non-federal representative within that timeframe, you may proceed with the Proposed Action under the terms of the NLAA concurrence provided in the PBO. This verification period allows Service Field Offices to apply local knowledge to implementation of the PBO, as we may identify a small subset of actions having impacts that were unanticipated. In such instances,

Service Field Offices may request additional information that is necessary to verify inclusion of the proposed action under the PBO.

**For Proposed Actions that include bridge/culvert or structure removal, replacement, and/or maintenance activities:** If your initial bridge/culvert or structure assessment documented signs of bat use or occupancy, or an assessment failed to detect Indiana bats and/or NLEBs, yet are later detected prior to, or during construction, please submit the Post Assessment Discovery of Bats at Bridge/Culvert or Structure Form (User Guide Appendix E) to this Service Office within 2 working days of any potential take. In these instances, potential incidental take of Indiana bats and/or NLEBs is covered under the Incidental Take Statement in the 2018 FHWA, FRA, FTA PBO (provided that the take is reported to the Service).

If the Proposed Action is modified, or new information reveals that it may affect the Indiana bat and/or northern long-eared bat in a manner or to an extent not considered in the PBO, further review to conclude the requirements of ESA Section 7(a)(2) may be required.

**For Proposed Actions that include bridge/culvert or structure removal, replacement, and/or maintenance activities:**

If your initial bridge/culvert or structure assessments failed to detect Indiana bats and/or NLEB use or occupancy, yet bats are later detected prior to, or during construction, please submit the Post Assessment Discovery of Bats at Bridge/Culvert or Structure Form (User Guide Appendix E) to this Service Office within 2 working days of the incident. In these instances, potential incidental take of Indiana bats and/or NLEBs may be exempted provided that the take is reported to the Service.

If the Proposed Action may affect any other federally-listed or proposed species, and/or any designated critical habitat, additional consultation between the lead Federal action agency and this Service Office is required. If the proposed action has the potential to take bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act may also be required. In either of these circumstances, please contact this Service Office.

The following species may occur in your project area and **are not** covered by this determination:

- Fanshell *Cyprogenia stegaria* Endangered
- Monarch Butterfly *Danaus plexippus* Candidate
- Rabbitsfoot *Quadrula cylindrica cylindrica* Threatened
- Tricolored Bat *Perimyotis subflavus* Proposed Endangered
- Whooping Crane *Grus americana* Experimental Population, Non-Essential



## PROJECT DESCRIPTION

The following project name and description was collected in IPaC as part of the endangered species review process.

### NAME

Des 2002077, Bridge Rehabilitation Project on SR 225 over the Wabash River in Tippecanoe County

### DESCRIPTION

The Indiana Department of Transportation (INDOT) has identified the need to address the deteriorated condition of a bridge on State Road (SR) 225 over the Wabash River. The project is located 0.60 mile north of Old SR 25. The project is in Section 25, Township 24 North, Range 4 West, as shown on the Lafayette East 7.5- Minutes US Geological Survey (USGS) Topographic Map.

The existing structure (225-79-04016-G/NBI: 029150) is a four-span, steel, Pratt truss bridge that is approximately 646 feet long and approximately 15 feet, 11 inches wide. Constructed in 1912, it has undergone multiple repairs between 1954 and 2014; however, it has retained the integrity necessary to convey its significance and has been identified as a “Select” bridge in the State of Indiana and is identified as eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion C. The bridge was inspected by INDOT on October 13, 2021, and was found to have cracking, leaching, and spalling with up to 17% delamination per span. There is also widespread deterioration of truss members and gusset plates due to existing curbs not being able to protect the truss members from roadway runoff. In addition, 161 of the truss and superstructure members do not have a load capacity meeting the Indiana Design Manual (IDM) requirement. The deck, wearing surface, superstructure and substructure have a poor condition rating (4 out of 9). The purpose of the proposed project is to improve portions of the bridge as required to increase the load capacity to meet an HS-15 loading and to protect members at risk of future deterioration.

The proposed project will include the replacement of truss members, gusset plates, and deck, a new railing will be constructed, and the substructure units will be patched to repair damaged piers and abutments. Revetment riprap on geotextiles will be placed around the wingwalls. The new structural steel will be color-matched to the existing floor system and truss. Class 1 Riprap will be placed around Piers 1 and 4. Riprap drainage turnouts will be constructed at all four corners of the bridge, and wildlife crossings composed of compacted No. 53 stone will be installed against both abutments.

Suitable summer habitat is within the project area, and approximately 0.18 acre of tree clearing will occur. Tree species within the project area include hackberry (*Celtis occidentalis*), eastern white pine (*Pinus strobus*), black walnut (*Juglans nigra*), silver maple (*Acer saccharinum*), and American basswood (*Tilia americana*). A review of the USFWS database that was conducted by INDOT, Crawfordsville district staff on February 8, 2022, did not indicate the presence of endangered bat species within 0.5-mile of the project area. A

bat inspection was conducted by BLN staff on August 17, 2022, and the results indicated no evidence of bats. All tree clearing will occur during the inactive season. Construction is anticipated to begin in Spring of 2024.

Structure #225-79-04016-G has shown evidence of use (i.e. nests) by a bird species protected under the Migratory Bird Treaty Act (MBTA) during the 12/08/20 inspection. Avoidance and minimization measures will be implemented prior to the start of and during the nesting season. Details of the required procedures are outlined in the “107-C-273 Migratory Bird Protection” RSP. It is likely that work will occur in the waterway and permits will be required in order to access the bridge for construction and to install the scour countermeasures.

The maintenance of traffic (MOT) plan for the project will involve a full closure with a detour utilizing Interstate (I) 65. The detour will be approximately 10 miles in length. It is anticipated that 0.5 acre of permanent right-of-way (ROW) and 0.2 acre of temporary ROW will be required. Temporary lighting may be used during construction; however, no permanent lighting will be necessary.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@40.4957472,-86.82377137607929,14z>





## DETERMINATION KEY RESULT

Based on your answers provided, this project(s) may affect, but is not likely to adversely affect the endangered Indiana bat and/or the endangered northern long-eared bat, therefore, consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required. However, also based on your answers provided, this project may rely on the concurrence provided in the amended February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion (dated March 23, 2023) for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat.

## QUALIFICATION INTERVIEW

1. Is the project within the range of the Indiana bat<sup>[1]</sup>?

[1] See [Indiana bat species profile](#)

**Automatically answered**

Yes

2. Is the project within the range of the northern long-eared bat<sup>[1]</sup>?

[1] See [northern long-eared bat species profile](#)

**Automatically answered**

Yes

3. Which Federal Agency is the lead for the action?

A) *Federal Highway Administration (FHWA)*

4. Are *all* project activities limited to non-construction<sup>[1]</sup> activities only? (examples of non-construction activities include: bridge/abandoned structure assessments, surveys, planning and technical studies, property inspections, and property sales)

[1] Construction refers to activities involving ground disturbance, percussive noise, and/or lighting.

No

5. Does the project include *any* activities that are **greater than** 300 feet from existing road/rail surfaces<sup>[1]</sup>?

[1] Road surface is defined as the actively used [e.g. motorized vehicles] driving surface and shoulders [may be pavement, gravel, etc.] and rail surface is defined as the edge of the actively used rail ballast.

No

6. Does the project include *any* activities **within** 0.5 miles of a known Indiana bat and/or NLEB hibernaculum<sup>[1]</sup>?

[1] For the purpose of this consultation, a hibernaculum is a site, most often a cave or mine, where bats hibernate during the winter (see suitable habitat), but could also include bridges and structures if bats are found to be hibernating there during the winter.

No

7. Is the project located **within** a karst area?

*No*

8. Is there *any* suitable<sup>[1]</sup> summer habitat for Indiana Bat or NLEB **within** the project action area<sup>[2]</sup>? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

[2] The action area is defined as all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 CFR Section 402.02). Further clarification is provided by the [User's Guide for the Range-wide Programmatic Consultation for Indiana Bat and Northern Long-eared Bat](#).

*Yes*

9. Will the project remove *any* suitable summer habitat<sup>[1]</sup> and/or remove/trim any existing trees **within** suitable summer habitat?

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

*Yes*

10. Will the project clear more than 20 acres of suitable habitat per 5-mile section of road/rail?

*No*

11. Have presence/probable absence (P/A) summer surveys<sup>[1][2]</sup> been conducted<sup>[3][4]</sup> **within** the suitable habitat located within your project action area?

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

[2] Presence/probable absence summer surveys conducted within the fall swarming/spring emergence home range of a documented Indiana bat hibernaculum (contact local Service Field Office for appropriate distance from hibernacula) that result in a negative finding requires additional consultation with the local Service Field Office to determine if clearing of forested habitat is appropriate and/or if seasonal clearing restrictions are needed to avoid and minimize potential adverse effects on fall swarming and spring emerging Indiana bats.

[3] For projects within the range of either the Indiana bat or NLEB in which suitable habitat is present, and no bat surveys have been conducted, the transportation agency will assume presence of the appropriate species. This assumption of presence should be based upon the presence of suitable habitat and the capability of bats to occupy it because of their mobility.

[4] Negative presence/probable absence survey results obtained using the [summer survey guidance](#) are valid for a minimum of two years from the completion of the survey unless new information (e.g., other nearby surveys) suggest otherwise.

*No*

12. Does the project include activities **within documented Indiana bat habitat**<sup>[1][2]</sup>?

[1] Documented roosting or foraging habitat – for the purposes of this consultation, we are considering documented habitat as that where Indiana bats and/or NLEB have actually been captured and tracked using (1) radio telemetry to roosts; (2) radio telemetry biangulation/triangulation to estimate foraging areas; or (3) foraging areas with repeated use documented using acoustics. Documented roosting habitat is also considered as suitable summer habitat within 0.25 miles of documented roosts.)

[2] For the purposes of this key, we are considering documented corridors as that where Indiana bats and/or NLEB have actually been captured and tracked to using (1) radio telemetry; or (2) treed corridors located directly between documented roosting and foraging habitat.

*No*

13. Will the removal or trimming of habitat or trees occur **within** suitable but **undocumented Indiana bat** roosting/foraging habitat or travel corridors?

*Yes*

14. What time of year will the removal or trimming of habitat or trees **within** suitable but **undocumented Indiana bat** roosting/foraging habitat or travel corridors occur<sup>[1]</sup>?

[1] Coordinate with the local Service Field Office for appropriate dates.

*B) During the inactive season*

15. Does the project include activities **within documented NLEB habitat**<sup>[1][2]</sup>?

[1] Documented roosting or foraging habitat – for the purposes of this consultation, we are considering documented habitat as that where Indiana bats and/or NLEB have actually been captured and tracked using (1) radio telemetry to roosts; (2) radio telemetry biangulation/triangulation to estimate foraging areas; or (3) foraging areas with repeated use documented using acoustics. Documented roosting habitat is also considered as suitable summer habitat within 0.25 miles of documented roosts.)

[2] For the purposes of this key, we are considering documented corridors as that where Indiana bats and/or NLEB have actually been captured and tracked to using (1) radio telemetry; or (2) treed corridors located directly between documented roosting and foraging habitat.

*No*

16. Will the removal or trimming of habitat or trees occur **within** suitable but **undocumented NLEB** roosting/foraging habitat or travel corridors?

*Yes*

17. What time of year will the removal or trimming of habitat or trees **within** suitable but **undocumented NLEB** roosting/foraging habitat or travel corridors occur?

*B) During the inactive season*

18. Will *any* tree trimming or removal occur **within** 100 feet of existing road/rail surfaces?

*Yes*

19. Will *any* tree trimming or removal occur **between** 100-300 feet of existing road/rail surfaces?

*No*



20. Are *all* trees that are being removed clearly demarcated?

Yes

21. Will the removal of habitat or the removal/trimming of trees include installing new or replacing existing **permanent** lighting?

No

22. Does the project include wetland or stream protection activities associated with compensatory wetland mitigation?

No

23. Does the project include slash pile burning?

No

24. Does the project include *any* bridge removal, replacement, and/or maintenance activities (e.g., any bridge repair, retrofit, maintenance, and/or rehabilitation work)?

Yes

25. Is there *any* suitable habitat<sup>[1]</sup> for Indiana bat or NLEB **within** 1,000 feet of the bridge? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's current [summer survey guidance](#) for our current definitions of suitable habitat.

Yes

26. Has a bridge assessment<sup>[1]</sup> been conducted **within** the last 24 months<sup>[2]</sup> to determine if the bridge is being used by bats?

[1] See [User Guide Appendix D](#) for bridge/structure assessment guidance

[2] Assessments must be completed no more than 2 years prior to conducting any work below the deck surface on all bridges that meet the physical characteristics described in the Programmatic Consultation, regardless of whether assessments have been conducted in the past. Due to the transitory nature of bat use, a negative result in one year does not guarantee that bats will not use that bridge/structure in subsequent years.

Yes

#### **SUBMITTED DOCUMENTS**

- *Bat Check Form 8.17.2022.pdf* <https://ipac.ecosphere.fws.gov/project/7OL2JIURQZCOJA6NEGWUKMSRNA/projectDocuments/121470165>

27. Did the bridge assessment detect *any* signs of Indiana bats and/or NLEBs roosting in/under the bridge (bats, guano, etc.)<sup>[1]</sup>?

[1] If bridge assessment detects signs of *any* species of bats, coordination with the local FWS office is needed to identify potential threatened or endangered bat species. Additional studies may be undertaken to try to identify which bat species may be utilizing the bridge prior to allowing *any* work to proceed.

Note: There is a small chance bridge assessments for bat occupancy do not detect bats. Should a small number of bats be observed roosting on a bridge just prior to or during construction, such that take is likely to occur or does occur in the form of harassment, injury or death, the PBO requires the action agency to report the take. Report all unanticipated take within 2 working days of the incident to the USFWS. Construction activities may continue without delay provided the take is reported to the USFWS and is limited to 5 bats per project.

No

28. Will the bridge removal, replacement, and/or maintenance activities include installing new or replacing existing **permanent** lighting?

No

29. Does the project include the removal, replacement, and/or maintenance of *any* structure other than a bridge? (e.g., rest areas, offices, sheds, outbuildings, barns, parking garages, etc.)

No

30. Will the project involve the use of **temporary** lighting *during* the active season?

Yes

31. Is there *any* suitable habitat **within** 1,000 feet of the location(s) where **temporary** lighting will be used?

Yes

32. Will the project install new or replace existing **permanent** lighting?

No

33. Does the project include percussives or other activities (**not including tree removal/trimming or bridge/structure work**) that will increase noise levels above existing traffic/background levels?

No

34. Are *all* project activities that are **not associated with** habitat removal, tree removal/trimming, bridge and/or structure activities, temporary or permanent lighting, or use of percussives, limited to actions that DO NOT cause any additional stressors to the bat species?

Examples: lining roadways, unlighted signage, rail road crossing signals, signal lighting, and minor road repair such as asphalt fill of potholes, etc.

Yes

35. Will the project raise the road profile **above the tree canopy**?

No

36. Are the project activities that are not associated with habitat removal, tree removal/trimming, bridge and/or structure activities, temporary or permanent lighting, or use of percussives consistent with a No Effect determination in this key?

**Automatically answered**

*Yes, other project activities are limited to actions that DO NOT cause any additional stressors to the bat species as described in the BA/BO*

37. Is the habitat removal portion of this project consistent with a Not Likely to Adversely Affect determination in this key?

**Automatically answered**

*Yes, because the tree removal/trimming that occurs outside of the Indiana bat's active season occurs greater than 0.5 miles from the nearest hibernaculum, is less than 100 feet from the existing road/rail surface, includes clear demarcation of the trees that are to be removed, and does not alter documented roosts and/or surrounding summer habitat within 0.25 miles of a documented roost.*

38. Is the habitat removal portion of this project consistent with a Not Likely to Adversely Affect determination in this key?

**Automatically answered**

*Yes, because the tree removal/trimming that occurs outside of the NLEB's active season occurs greater than 0.5 miles from the nearest hibernaculum, is less than 100 feet from the existing road/rail surface, includes clear demarcation of the trees that are to be removed, and does not alter documented roosts and/or surrounding summer habitat within 0.25 miles of a documented roost.*

39. Is the bridge removal, replacement, or maintenance activities portion of this project consistent with a No Effect determination in this key?

**Automatically answered**

*Yes, because the bridge has been assessed using the criteria documented in the BA and no signs of bats were detected*

40. **General AMM 1**

Will the project ensure *all* operators, employees, and contractors working in areas of known or presumed bat habitat are aware of *all* FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable Avoidance and Minimization Measures?

*Yes*

**41. Tree Removal AMM 1**

Can *all* phases/aspects of the project (e.g., temporary work areas, alignments) be modified, to the extent practicable, to avoid tree removal<sup>[1]</sup> in excess of what is required to implement the project safely?

Note: Tree Removal AMM 1 is a minimization measure, the full implementation of which may not always be practicable. Projects may still be NLAA as long as Tree Removal AMMs 2, 3, and 4 are implemented and LAA as long as Tree Removal AMMs 3, 5, 6, and 7 are implemented.

[1] The word “trees” as used in the AMMs refers to trees that are suitable habitat for each species within their range. See the USFWS’ current summer survey guidance for our latest definitions of suitable habitat.

Yes

**42. Tree Removal AMM 3**

Can tree removal be limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits)?

Yes

**43. Tree Removal AMM 4**

Can the project avoid cutting down/removal of *all* (1) **documented**<sup>[1]</sup> Indiana bat or NLEB roosts<sup>[2]</sup> (that are still suitable for roosting), (2) trees **within** 0.25 miles of roosts, and (3) documented foraging habitat any time of year?

[1] The word documented means habitat where bats have actually been captured and/or tracked.

[2] Documented roosting or foraging habitat – for the purposes of this consultation, we are considering documented habitat as that where Indiana bats and/or NLEB have actually been captured and tracked using (1) radio telemetry to roosts; (2) radio telemetry biangulation/triangulation to estimate foraging areas; or (3) foraging areas with repeated use documented using acoustics. Documented roosting habitat is also considered as suitable summer habitat within 0.25 miles of documented roosts.)

Yes

**44. Lighting AMM 1**

Will *all* **temporary** lighting be directed away from suitable habitat during the active season?

Yes

## PROJECT QUESTIONNAIRE

1. Have you made a No Effect determination for *all* other species indicated on the FWS IPaC generated species list?

Yes

2. Have you made a May Affect determination for *any* other species on the FWS IPaC generated species list?

No



3. How many acres<sup>[1]</sup> of trees are proposed for removal between 0-100 feet of the existing road/rail surface?

[1] If described as number of trees, multiply by 0.09 to convert to acreage and enter that number.

0.18

4. Please describe the proposed bridge work:

*The proposed project will include the replacement of truss members, gusset plates, and deck, a new railing will be constructed, and the substructure units will be patched to repair damaged piers and abutments. Revetment riprap on geotextiles will be placed around the wingwalls. The new structural steel will be color-matched to the existing floor system and truss.*

5. Please state the timing of all proposed bridge work:

*Spring 2024*

6. Please enter the date of the bridge assessment:

*August 17, 2022*

## **AVOIDANCE AND MINIMIZATION MEASURES (AMMS)**

This determination key result includes the commitment to implement the following Avoidance and Minimization Measures (AMMs):

### **TREE REMOVAL AMM 2**

Apply time of year restrictions for tree removal when bats are not likely to be present, or limit tree removal to 10 or fewer trees per project at any time of year within 100 feet of existing road/rail surface and **outside of documented** roosting/foraging habitat or travel corridors; visual emergence survey must be conducted with no bats observed.

### **TREE REMOVAL AMM 3**

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

### **TREE REMOVAL AMM 4**

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

### **GENERAL AMM 1**

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

### **TREE REMOVAL AMM 1**

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

**LIGHTING AMM 1**

Direct temporary lighting away from suitable habitat during the active season.

## **DETERMINATION KEY DESCRIPTION: FHWA, FRA, FTA PROGRAMMATIC CONSULTATION FOR TRANSPORTATION PROJECTS AFFECTING NLEB OR INDIANA BAT**

This key was last updated in IPaC on June 14, 2023. Keys are subject to periodic revision.

This decision key is intended for projects/activities funded or authorized by the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), and/or Federal Transit Administration (FTA), which may require consultation with the U.S. Fish and Wildlife Service (Service) under Section 7 of the Endangered Species Act (ESA) for the endangered **Indiana bat** (*Myotis sodalis*) and the endangered **northern long-eared bat** (NLEB) (*Myotis septentrionalis*).

This decision key should only be used to verify project applicability with the Service's [amended February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion \(dated March 23, 2023\) for Transportation Projects](#). The programmatic biological opinion covers limited transportation activities that may affect either bat species, and addresses situations that are both likely and not likely to adversely affect either bat species. This decision key will assist in identifying the effect of a specific project/activity and applicability of the programmatic consultation. The programmatic biological opinion is not intended to cover all types of transportation actions. Activities outside the scope of the programmatic biological opinion, or that may affect ESA-listed species other than the Indiana bat or NLEB, or any designated critical habitat, may require additional ESA Section 7 consultation.

## **IPAC USER CONTACT INFORMATION**

Agency: Indiana Department of Transportation

Name: Benjamin Neild

Address: 41 W. 300 N.

City: Crawfordsville

State: IN

Zip: 47933

Email [bneild@indot.in.gov](mailto:bneild@indot.in.gov)

Phone: 7653615259



## Bridge/Structure Bat Assessment Form

Date & Time of Assessment: 08/17/2022	DOT Project Number: 2002077	Route/Facility Carried: SR 225	County: Tippecanoe
Federal Structure ID: 225-79-04016-G/NBI#029150	Structure Coordinates (latitude and longitude): 40.49552, -86.82329	Structure Height (approximate):	Structure Length: 646 ft
<b>Structure Type (check one)</b>		<b>Structure Material (check all that apply)</b>	
<b>Bridge Construction Style</b>		<b>Deck Material</b>	<b>Beam Material</b>
<input type="radio"/> Cast-in-place	<input type="radio"/> Pre-stressed Girder	<input type="checkbox"/> Metal	<input type="checkbox"/> None
<input type="radio"/> Flat Slab/Box	<input type="radio"/> Steel I-beam	<input checked="" type="checkbox"/> Concrete	<input type="checkbox"/> Concrete
<input checked="" type="radio"/> Truss	<input type="radio"/> Covered	<input type="checkbox"/> Timber	<input checked="" type="checkbox"/> Steel
<input type="radio"/> Parallel Box Beam	<input type="radio"/> Other:	<input type="checkbox"/> Open grid	<input type="checkbox"/> Timber
		<input type="checkbox"/> Other:	<input type="checkbox"/> Other:
<b>Culvert Type</b>		<b>Culvert Material</b>	<b>Creosote Evidence</b>
<input type="radio"/> Box	<input type="radio"/> Other Structure	<input type="checkbox"/> Metal	<input type="radio"/> Yes
<input type="radio"/> Pipe/Round		<input type="checkbox"/> Concrete	<input checked="" type="radio"/> No
<input type="radio"/> Other:		<input type="checkbox"/> Plastic	<input type="radio"/> Unknown
		<input type="checkbox"/> Stone/Masonry	<b>Notes:</b>
		<input type="checkbox"/> Other:	
<b>Crossings Traversed (check all that apply)</b>		<b>Surrounding Habitat (check all that apply)</b>	
<input type="checkbox"/> Bare ground	<input type="checkbox"/> Open vegetation	<input type="checkbox"/> Agricultural	<input type="checkbox"/> Grassland
<input type="checkbox"/> Rip-rap	<input type="checkbox"/> Closed vegetation	<input type="checkbox"/> Commercial	<input type="checkbox"/> Ranching
<input checked="" type="checkbox"/> Flowing water	<input type="checkbox"/> Railroad	<input type="checkbox"/> Residential-urban	<input type="checkbox"/> Riparian/wetland
<input type="checkbox"/> Standing water	<input type="checkbox"/> Road/trail - Type:	<input type="checkbox"/> Residential-rural	<input type="checkbox"/> Mixed use
<input type="checkbox"/> Seasonal water	<input type="checkbox"/> Other:	<input checked="" type="checkbox"/> Woodland/forested	<input type="checkbox"/> Other:
<b>Areas Assessed (check all that apply)</b>			
Check all areas that apply. If an area is not present in the structure, check the "not present" box. Document all bat indicators observed during the assessment. Include the species present, if known, and provide photo documentation as indicated.			
<b>Area (check if assessed)</b>	<b>Assessment Notes</b>	<b>Evidence of Bats (include photos if present)</b>	
<input type="checkbox"/> All crevices and cracks: Bridges/culverts: rough surfaces or imperfections in concrete Other structures: soffits, rafters, attic areas	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> Concrete surfaces (open roosting on concrete)	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> Spaces between concrete end walls and the bridge deck	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> Crack between concrete railings on top of the bridge deck	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input type="checkbox"/> Vertical surfaces on concrete I-beams	<input checked="" type="checkbox"/> Not present	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> Spaces between walls, ceiling joists	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> Weep holes, scupper drains, and inlets/pipes	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> All guiderails	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
<input checked="" type="checkbox"/> All expansion joints	<input type="checkbox"/> Not present <b>No bats</b>	<input type="checkbox"/> Visual - live #	<input type="checkbox"/> dead #
		<input type="checkbox"/> Audible	<input type="checkbox"/> Species
		<input type="checkbox"/> Odor	
		<input type="checkbox"/> Guano	<input type="checkbox"/> Photos
		<input type="checkbox"/> Staining	
Name: Peyton Sinnet		Signature: <i>Peyton Sinnet</i>	

**THIS IS NOT A PERMIT**

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

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**DNR#:** ER-24854-1

**Request Received:** May 24, 2023

**Requestor:**

Raquel Walker  
Beam, Longest & Neff, LLC  
8320 Craig Street  
Indianapolis, IN 46250

**Project:**

SR 225 bridge (#225-79-04016-F / NBI 029150) rehabilitation and new riprap placement around Piers 2 & 4 over Wabash River, 0.60 mile north of Old SR 25; Des #2002077

**County/Site Info:** Tippecanoe County

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

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

**Regulatory Assessment:**

This proposal will require the formal approval of our agency for construction in a floodway, pursuant to the Flood Control Act (IC 14-28-1), unless it qualifies under the INDOT and IDNR Memorandum of Understanding for Maintenance Activity Exemption, dated March 1997. Please include a copy of this letter with the permit application, if required.

**Natural Heritage Database:**

The Natural Heritage Program's data have been checked. As indicated in the original response from July 11, 2022, the following species have been documented within 0.5 miles of the project area.

A) PLANT: tall bur-head (*Echinodorus berteroi*), state endangered

B) BIRD: sedge wren (*Cistothorus stellaris*), state endangered

C) MUSSELS:

1. Snuffbox (*Epioblasma triquetra*), federal & state endangered
2. Rayed Bean (*Villosa fabalis*), federal & state endangered
3. Fanshell (*Cyprogenia stegaria*), federal & state endangered
4. Clubshell (*Pleurobema clava*), federal & state endangered
5. Northern riffleshell (*Epioblasma rangiana*), federal & state endangered
6. Rough Pigtoe (*Pleurobema plenum*), federal & state endangered
7. Round hickorynut (*Obovaria subrotunda*) state endangered
8. Ohio Pigtoe (*Pleurobema cordatum*), state special concern
9. Wavyrayed lampmussel (*Lampsilis fasciola*), state special concern
10. Black sandshell (*Ligumia recta*), state special concern
11. Pyramid Pigtoe (*Pleurobema rubrum*), state extirpated
12. Tubercled Blossom (*Epioblasma torulosa*), state extirpated

13. Longsolid (*Fusconaia subrotunda*), state extirpated
14. White Wartyback (*Plethobasus cicatricosus*), state extirpated
15. Ring Pink (*Obovaria retusa*), state extirpated

**Fish and Wildlife Comments:**

In addition to the previous comments provided on August 10, 2022, the following comments are provided to specifically address concerns about the above-mentioned mussels.

As long as riprap is placed by barge and the riprap is placed immediately adjacent to the piers, and the barge is able to access the work areas without dragging on the streambed or otherwise scouring the streambed, impacts to mussels should be minimal. The use of a barge is a good alternative to building a causeway or using cofferdams.

**Contact Staff:**

Our agency appreciates this opportunity to be of service. Please contact me at [mbuffington@dnr.in.gov](mailto:mbuffington@dnr.in.gov) or (317) 233-4666 if we can be of further assistance.

*Matt Buffington*  
Matt Buffington  
Environmental Unit Supervisor  
Division of Fish and Wildlife

**Date:** June 23, 2023

# **Appendix D:**

## **Section 106 of the NHPA**



**FEDERAL HIGHWAY ADMINISTRATION'S  
SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties) AND  
SECTION 106 FINDINGS AND DETERMINATIONS  
AREA OF POTENTIAL EFFECT  
ELIGIBILITY DETERMINATIONS  
EFFECT FINDING  
State Road 225 over Wabash River  
Historic Bridge Rehabilitation Project  
Tippecanoe County, Indiana  
DES. NO.: 2002077; DHPA # 29044**

**AREA OF POTENTIAL EFFECTS  
(Pursuant to 36 CFR Section 800.4(a)(1))**

The Area of Potential Effects (APE) includes the vicinity that would be physically and visually impacted by the project. Due to the scope of work, the APE was drawn to include the bridge, properties immediately adjacent, and those areas within the viewshed to and from the existing bridge. The APE is irregular in shape due to the viewshed from the bridge. The properties within the APE are suburban to the north; agriculture fields to the northwest and southeast; and wooded areas to the northwest and southeast along the Wabash River. The archaeological APE is represented by the project area, which consists of the existing and proposed temporary right of way, and a 0.5 survey boundary along the north and south bank of the Wabash River. The archaeological APE was investigated for the presence of archaeological deposits. Please see Appendix A for APE maps.

**ELIGIBILITY DETERMINATIONS  
(Pursuant to 36 CFR 800.4(c)(2))**

There is one resource eligible for listing in the National Register of Historic Places (NRHP) within the APE:

Bridge No. 225-79-04016G, Jewettsport Ford Bridge, (IHSSI # 157-332-00012, NBI No. 029150), is a metal thru truss bridge carrying State Road (SR) 225 over the Wabash River. The bridge was built in 1912 and measures 630 feet in length. The bridge was determined eligible for listing in the NRHP under Criterion C for its engineering significance. It was built by the Lafayette Engineering Company and is the longest riveted Pratt truss still extant in Indiana.

The APE contains no properties listed in the NRHP.

**EFFECT FINDING**

Per the terms of the “Programmatic Agreement Regarding Management and Preservation of Indiana’s Historic Bridges” (Historic Bridges PA), the Federal Highway Administration—Indiana Division (FHWA) will satisfy its Section 106 responsibilities involving “Select” and “Non-Select” bridges through the Project Development Process (PDP) of the Historic Bridges PA (Stipulation III). Bridge No. 225-79-04016G has been classified as a “Select” Bridge by the INDOT Historic Bridge Inventory and, thus, the procedures outlined in Stipulation III.A, Project Development Process for Select Bridges of the Historic Bridges PA will be followed to fulfill FHWA’s Section 106 responsibilities for the bridge.

Therefore, the finding for this project only applies to other resources located within the APE and not the Bridge No. 225-79-04016G. This document will satisfy the Section 106 responsibilities for other resources located in the APE. Regarding other resources located in the project area, INDOT, acting on FHWA’s behalf has determined a "No Historic Property Effectuated" finding is appropriate for this undertaking.

INDOT respectfully requests the Indiana State Historic Preservation Officer provide written concurrence with the Section 106 determination of effect.

**SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties)**

Bridge No. 225-79-04016G - This resource is used for transportation purposes and no Section 4(f) conversion will take place with this project; therefore, no Section 4(f) evaluation must be completed for Bridge No. 225-79-04016G.



Matt Coon, for FHWA  
Manager  
INDOT Cultural Resources

March 24, 2023  
Approved Date



**FEDERAL HIGHWAY ADMINISTRATION  
DOCUMENTATION OF SECTION 106 FINDING OF  
NO HISTORIC PROPERTIES AFFECTED  
SUBMITTED TO THE STATE HISTORIC PRESERVATION OFFICER  
PURSUANT TO 36 CFR Section 800.4(d)(1)  
State Road 225 over Wabash River  
Historic Bridge Rehabilitation Project  
Tippecanoe County, Indiana  
Des. No. 2002077; DHPA# 29044**

**1. DESCRIPTION OF THE UNDERTAKING**

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration (FHWA), proposes a bridge project involving Bridge No. 225-79-04016G (Indiana Historic Sites and Structures Inventory [IHSSI] # 157-332-00012, NBI No. 029150) carrying State Road (SR) 225 over the Wabash River (Des. No. 2002077). Clark Dietz, as a subconsultant to Beam Longest and Neff (BLN), is under contract with INDOT to advance the environmental documentation for the referenced project. The project is within Tippecanoe and Washington Townships, Lafayette East USGS Topographic Quadrangle, in Section 25, Township 24 North, Range 4 West and Burnett's Number 3 Section. See Appendix A for maps.

The proposed project is located on SR 225 0.60 mile north of Old SR 25 in Tippecanoe County, Indiana. The project length is approximately 642 feet, consisting of Bridge No. 225-79-04016G carrying SR 225 over the Wabash River. The project area consists of floodplain and terrace on the north side of the Wabash River and is within a large floodplain on the south side of the Wabash River. It is estimated there will be approximately 0.23 acre of temporary right-of-way acquired. Land use in the project area consists of the bridge itself, surrounded by agricultural fields and wooded areas (See Appendix E: Stage 2 Plans for 30% Complete Plan Review).

Section 106 of the National Historic Preservation Act requires Federal agencies to consider the effects of their undertakings on historic properties; the Federal involvement is funding from the FHWA.

The Bridge No. 225-79-04016G, Jewettsport Ford Bridge, is a metal thru truss bridge carrying SR 225 over the Wabash River. The bridge was built in 1912 and measures 630 feet in length. In the 1990 IHSSI survey, the bridge was rated Outstanding. Bridge No. 225-79-04016G was designed and built by E.B. Vawter and the Lafayette Engineering Company, who are based in Lafayette, Indiana.

The bridge is rated "Select" in the INDOT Historic Bridge Inventory (HBI). Bridge No. 225-79-04016G retains its original design and therefore remains eligible for the National Register of Historic Places (NRHP) under Criterion C (See Appendix D: Report Summaries). The bridge is eligible for the NRHP, under Criterion C for its engineering significance. It is the longest riveted Pratt truss still extant in Indiana. Following the procedures outlined in the Stipulation III.A, the Project Development Process for "Select" Bridges, of the Programmatic Agreement Regarding Management and Preservation of Indiana's Historic Bridges (Historic Bridges PA), Bridge No. 225-79-04016G, a bridge classified as a "Select" by the INDOT Historic Bridge Inventory, will follow the Historic Bridges PA and fulfill FHWA's Section 106 responsibilities for the bridge.

**Purpose and Need**

The need for the proposed project arises from the most recent inspection and Bridge Inspection Report which indicated that there are structural deficiencies such as cracking, leaching and spalling along the bridge deck; cracking and weathering on Abutment No. 1 and No. 5; and widespread deterioration of the truss members and gusset plates. In addition, the curbs are geometrically inaccurate and do not protect the truss members from run off. Furthermore, many of the truss and superstructure members do not have a load capacity that meets the Indiana Design Manual (IDM) requirement. If the deterioration is allowed to continue and the insufficient load capacity is not corrected, then the bridge will continue to deteriorate until it is impassable, thus causing a significant community disruption and higher motorists' costs and travel time. The purpose of the proposed project is to improve the required portions of the bridge



to increase the load capacity of the bridge to meet an HS-15 loading and to protect the existing members that are at risk of future deterioration by addressing the bridge deck cracking, leaching, and spalling, which could compromise the structural integrity of the bridge. (See Appendix D: Report Summaries).

### **Preferred Alternative**

This project includes the rehabilitation of the bridge carrying SR 225 over the Wabash River (Bridge No. 225-79-04016G, NBI No. 029150). The preferred alternative will improve the load capacity of the bridge to meet an HS-15 load capacity level and protect the members that are at risk of future deterioration by repairing and/or replacing superstructure elements. All floor beams will be replaced, but the existing stringers will be removed, stored, and re-used. The bridge deck will be replaced, and new railing will be constructed. Select full members and gusset plates will be replaced as needed. After the floor system is replaced and the truss is repaired, the structural steel of the bridge will be cleaned and painted to protect it from deterioration. The paint color shall match the color of the existing floor system and truss. Patching of the substructure units will occur to repair the damaged portions of the piers and abutments. See the Historic Bridge Alternatives Analysis (HBAA) in IN SCOPE (<http://erms12c.indot.in.gov/Section106Documents/>) for a more detailed project description and see the Stage 2 Plans for 30% Complete Plan Review.

### **Area of Potential Effects**

The Area of Potential Effects (APE) includes the vicinity that will be physically and visually impacted by the project. Due to the scope of work, the APE was drawn to include the bridge, properties immediately adjacent, and those areas within the viewshed to and from the existing bridge. The APE consists of the bridge itself, surrounding agricultural fields, and some wooded areas. The APE is irregular in shape due to the viewshed from the bridge. The properties within the APE are suburban to the north; agriculture fields to the northwest and southeast; and wooded areas to the northwest and southeast along the Wabash River. The archaeological APE is represented by the project area, which consists of the existing and proposed temporary right of way, and a 0.5 survey radius on the north and south bank of the Wabash River. The archaeological APE was investigated for the presence of archaeological deposits. Please see Appendix A for APE maps.

## **2. EFFORTS TO IDENTIFY HISTORIC PROPERTIES**

The National Register of Historic Places (NRHP) was searched for listings in Tippecanoe County. There are no NRHP listed properties within the APE. The APE contains one structure, Bridge No. 225-79-04016G, recommended eligible for listing in the NRHP.

The Indiana Historic Sites and Structures Inventory (IHSSI) for Tippecanoe County was examined using the State Historic Architectural and Archaeological Research Database (SHAARD) and Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBM). Two IHSSI properties were recorded within the project's APE; Bridge No. 225-79-04016G (IHSSI #157-332-00012/HB-1673) and Prophet's Town Historical Marker (IHSSI #157-332-05031). The INDOT Historic Bridge Inventory (HBI) was reviewed. The one bridge listed in the HBI that was identified within the project area, Bridge No. 225-79-04016G (NBI No. 029150), is designated "Select." The *Tippecanoe County Interim Report* (Historic Landmarks of Foundation Indiana [HLFI], 1990) was also inspected. The Washington and Tippecanoe Township maps within the *Tippecanoe County Interim Report* were studied and compared with the IHBBM. A search of INSCOPE, INDOT's Section 106 portal (<http://erms12c.indot.in.gov/Section106Documents/>) did not reveal any previous investigations near the project area.

An early coordination letter (ECL) was sent on April 5, 2022, to the following list:

State Historic Preservation Office (SHPO)  
Indiana Landmarks - Western Regional Office  
Lafayette Historic Preservation Commission  
Wabash Valley Trust for Historic Preservation  
Historic Spans Task Force



Historic Hoosier Bridges  
HistoricBridges.org  
Historic Bridge Foundation  
Tippecanoe County Historian  
Tippecanoe County Area Genealogical Society  
Tippecanoe County Historical Association  
Tippecanoe County Commissioner  
Tippecanoe County Highway Supervisor  
Tippecanoe County Surveyor  
Tippecanoe County Engineer  
Eastern Shawnee Tribe of Oklahoma  
Miami Tribe of Oklahoma  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indians  
Shawnee Tribe  
Forest County Potawatomi Community

The following responses were received to join consultation as consulting parties (See Appendix C: Consulting Parties and Correspondence).

The Historic Spans Task Force responded to the ECL on April 5, 2022, stating “Please include me as a Consulting Party on this project.”

The Historic Hoosier Bridges responded to the ECL on April 5, 2022, stating “Please include me as a consulting party on this project.”

The HistoricBridges.org responded to the ECL on April 5, 2022, stating “Please include me as a Consulting Party on this project.”

The Miami Tribe of Oklahoma responded to the ECL on April 6, 2022, stating “The Miami Tribe is not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site; however, very near the project are historically significant Prophetstown and the site of the Battle of Tippecanoe. Given the Miami Tribe’s deep and enduring relationship to its historic lands and cultural property within present-day Indiana, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery.”

The Peoria Tribe of Indians of Oklahoma responded to the ECL on April 6, 2022, stating “Thank you for providing notice of the referenced project. The Peoria Tribe of Indians of Oklahoma is unaware of a direct link to the newly proposed project location. The Peoria Tribe of Indians of Oklahoma is also unaware of items covered under Native American Graves Protection and Repatriation Act (NAGPRA) to be associated with the proposed project site, including funerary or sacred objects; objects of cultural patrimony; or ancestral human remains. The Peoria Tribe has no objection at this time to the proposed project. If, however, at any time items are discovered which fall under the protection of NAGPRA, the Peoria Tribe requests immediate notification and consultation. In addition, state, local and tribal authorities should be advised as to the findings and construction halted until consultation with all concerned parties has occurred.”

SHPO responded to the ECL on April 14, 2022, stating that “For the purposes of Indiana Code 14-21-1-18 and 312 IAC 20-4, we have added the members of the Review Board and additional, potentially interested parties to the list of parties we intend to copy with our comment letters. Anyone receiving an e-mailed copy of this letter who does not wish to receive future copies of our correspondence about this project is asked to reply by e-mail to [dkauffmann@dnr.IN.gov](mailto:dkauffmann@dnr.IN.gov) and advise us that he or she does not wish to receive any further copies of our e-mails on this project. In your next regular submission, please include which consulting parties agree to participate in the consultation of this dual review. We see in INDOT’s April 5, 2022, letter that FHWA will satisfy its Section 106



responsibilities involving ‘Select’ and ‘Non-Select’ bridges through the Project Development Process of the ‘Programmatic Agreement Regarding Management and Preservation of Indiana’s Historic Bridges.’ We note within the Indiana Historic Bridge Inventory, the SR 225 Bridge (INDOT Bridge No. 225-79-04016G; NBI 029150) is listed as eligible for listing in the National Register of Historic Places and classified as a ‘Select’ bridge. As INDOT’s April 5, 2022, letter indicates, additional information regarding above-ground historic resources and archaeological resources are forthcoming. Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.”

The Eastern Shawnee Tribe of Oklahoma responded to the ECL on April 26, 2022, stating “As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.”

The Pokagon Band of Potawatomi Indians responded to the ECL on May 5, 2022, stating “I am writing to inform you that I have reviewed the details for the project referenced above. The proposed work is occurring within a mile of known archaeological sites, historic sites or features that are considered sensitive or recorded in the Pokagon Band Historic Inventory Database. I have made the determination that the project will have No Adverse Effect on any historic, religious, or culturally significant resources to the Pokagon Band of Potawatomi Indians. If any cultural or archaeological resources are uncovered during construction, please stop work, and contact me immediately.”

A Historic Bridges Alternatives Analysis (HBAA) was distributed on June 27, 2022, to consulting parties and uploaded to INSCOPE. The HBAA concluded that Alternative B.1 Rehabilitation of the Existing Bridge for Continued Vehicular Use (Two-Way Option) Meeting Secretary of Interior’s Standards (SOIS) for Rehabilitation was feasible and prudent. The alternative noted that the rehabilitation would bring the bridge up to “current INDOT and FHWA criteria for structural capacity and safety features.” (See Appendix C: Consulting Parties and Correspondence and Appendix D for the title page and summary of the HBAA).

The Historic Hoosier Bridges responded to the HBAA on July 18, 2022, stating “I applaud the decision to rehabilitate and maintain this structure for continued use on this lower volume state road. It will continue to be an historic attribute that fits in well with the Prophetstown area. During my visits, the stoplight-controlled crossing seemed to be very effective in maintaining the traffic flow from both directions. My only comments or concerns would be in regards to the materials and methods used in the rehabilitation process. I would expect this to be performed on an in-kind manner, as to maintain the highest historic integrity possible. I look forward to further discussion on this project.”

The Historic Spans Task Force responded to the HBAA on July 20, 2022, stating “Upon review of the Historic Bridge Alternatives Analysis Report, the Preliminary Preferred Alternative of Rehabilitation for Continued Two-Way Vehicular Use is supported as described for this outstanding Historic Structure. INDOT’s commitment to our Cultural Heritage of Historic Bridges is extremely appreciated. It was noted that in reaching the decision that the option was Feasible and Prudent the cost estimates indicated that rehabilitation ‘will result in significantly extending the life of the bridge at under half the cost of bridge replacement’.”

SHPO responded to the HBAA on July 25, 2022, stating that “The SR 225 over the Wabash River is a c. 1912 four-span steel Pratt truss with a concrete deck that is categorized as a “Select” bridge that is previously determined eligible for inclusion in the National Register of Historic Places. We agree with the conclusions of the HBAA that Alternative B-1: Rehabilitation for Continued Two-Way Vehicular Use, meeting Secretary of Interior’s Standards for Rehabilitation is the preferred alternative for this project compared to the No Build Alternative. As referenced in Section V.C of the HBAA, we request that this bridge be photographically documented. We request color, digital images that provide overviews of the resource, along with detailed shots of character-defining features. In addition to the photographs, please provide a photo log that corresponds to the photographs, a photo key, and an overview thumbnail sheet. Please submit a draft copy of this documentation on CD, flash drive, or any other previously approved storage device for our review and approval. Upon approval, this documentation should be provided to a public or not-



for-profit organization that is willing to accept a copy of this documentation and make it available to the public. Please inform us which local or not-for-profit organization is willing to accept this documentation.”

The Eastern Shawnee Tribe of Oklahoma responded to the HBAA on August 31, 2022, stating “As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.”

A historian who meets the Secretary of the Interior’s Professional Qualification Standards identified and evaluated above-ground resources within the APE for potential eligibility for the NRHP on June 15, 2022. As a result of the historic property identification and evaluation efforts, one property, Bridge No. 225-79-04016G was recommended for inclusion in the NRHP (Shaw, 2022) (the report abstract, and conclusions are included in Appendix D).

Regarding the archaeological resources, a qualified professional archaeologist reviewed the proposed project area on June 26 and August 24, 2022. The field investigation recorded no previously undocumented sites. The archaeological field reconnaissance identified no archaeological sites within the proposed project area (the report abstracts and conclusions are included in Appendix D).

A Historic Properties Short Report (HPSR) and Phase Ia Archaeological Short Report (ASR) were distributed on December 28, 2022, to consulting parties and uploaded to INSCOPE (See Appendix C: Consulting Parties and Correspondence and Appendix D for the abstract and summary of the HPSR.)

The Historic Spans Task Force responded to the HPSR and ASR on December 29, 2022, stating “My thanks for the information regarding the SR225 Bridge Project. I have reviewed the excellent Historic Property Report and Archaeology Report and have no additional comments.”

Forest County Potawatomi Community responded to the HPSR and ASR on December 29, 2022, stating “The Tribal Historic Preservation Office (THPO) staff has reviewed the information you provided for this project. Upon review of site data and supplemental cultural history within our Office, the FCPC THPO is pleased to offer a finding of No Historic Properties affected of significance to the FCPC, however, we request to remain as a consulting party for this project.”

Eastern Shawnee Tribe of Oklahoma responded to the HPSR and ASR on January 23, 2023, stating “As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes NO Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe.”

SHPO responded to the HPSR and ASR on January 27, 2023, stating “We agree with the conclusions of the HPR that as a result of the historic property identification and evaluation efforts, no above-ground resources other than INDOT Bridge No. 225-79-04016G (NBI No. 029150) are recommended as eligible for listing in the NRHP. Additionally, in terms of archaeological resources, based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have no identified any currently known archaeological resources listed in or eligible for inclusion in the NRHP within the proposed project area; and we concur with the opinion of the archaeologist, as expressed in the Indiana archaeological short report (Shaw, 12/28/2022), that no further archaeological investigations appear necessary at the proposed project area.”

No other consulting party comments were received.

No further efforts to identify cultural resources took place.

Per the "Standard Treatment Approach for Historic Bridges" from the Historic Bridge Programmatic Agreement, INDOT will provide rehabilitation plans to the Indiana SHPO when the design is approximately 30% complete, 60% complete, and when final design plans are complete. Please see Appendix E for the Stage 2 Plans for 30% Complete Plan Review.

A public notice of the "No Adverse Historic Properties Effected" finding will be published in the *Journal & Courier*, which covers Tippecanoe County and Lafayette, Indiana, and the public will be afforded thirty (30) days to respond. This document will be revised, if necessary, after the expiration of the public comment period.

Please see Appendix C for Consulting Parties and Correspondence and Appendix D for summaries of the HPSR, HBAA, and ASR.

### 3. BASIS FOR FINDING

Based on the identification efforts, a finding of "No Historic Properties Affected" is appropriate because there are no historic properties present within the APE other than Bridge No. 225-79-04016G. Per the terms of the Historic Bridge PA, the FHWA will satisfy its Section 106 responsibilities involving "Select" and "Non-Select" bridges through the Project Development Process (PDP) of Stipulation III of the Historic Bridges PA and therefore, the finding for this project only applies to other resources located within the APE and not the bridge.

Per Stipulation III of the Historic Bridges PA, the project sponsor (INDOT) will hold a public hearing for the project prior to completion of National Environmental Policy Act (NEPA) studies. All originally invited consulting parties will be notified of the public hearing.

INDOT, acting on behalf of the FHWA, has issued a finding of "No Historic Properties Affected."

### APPENDIX

~~Appendix A: Maps~~

~~Appendix B: Photographs~~

Appendix C: Consulting Parties and Correspondence

Appendix D: Historic Property Short Report, Historic Bridges Alternatives Analysis, and Archaeology Short Report Summaries

~~Appendix E: Stage 2 Plans for 30% Complete Plan Review~~

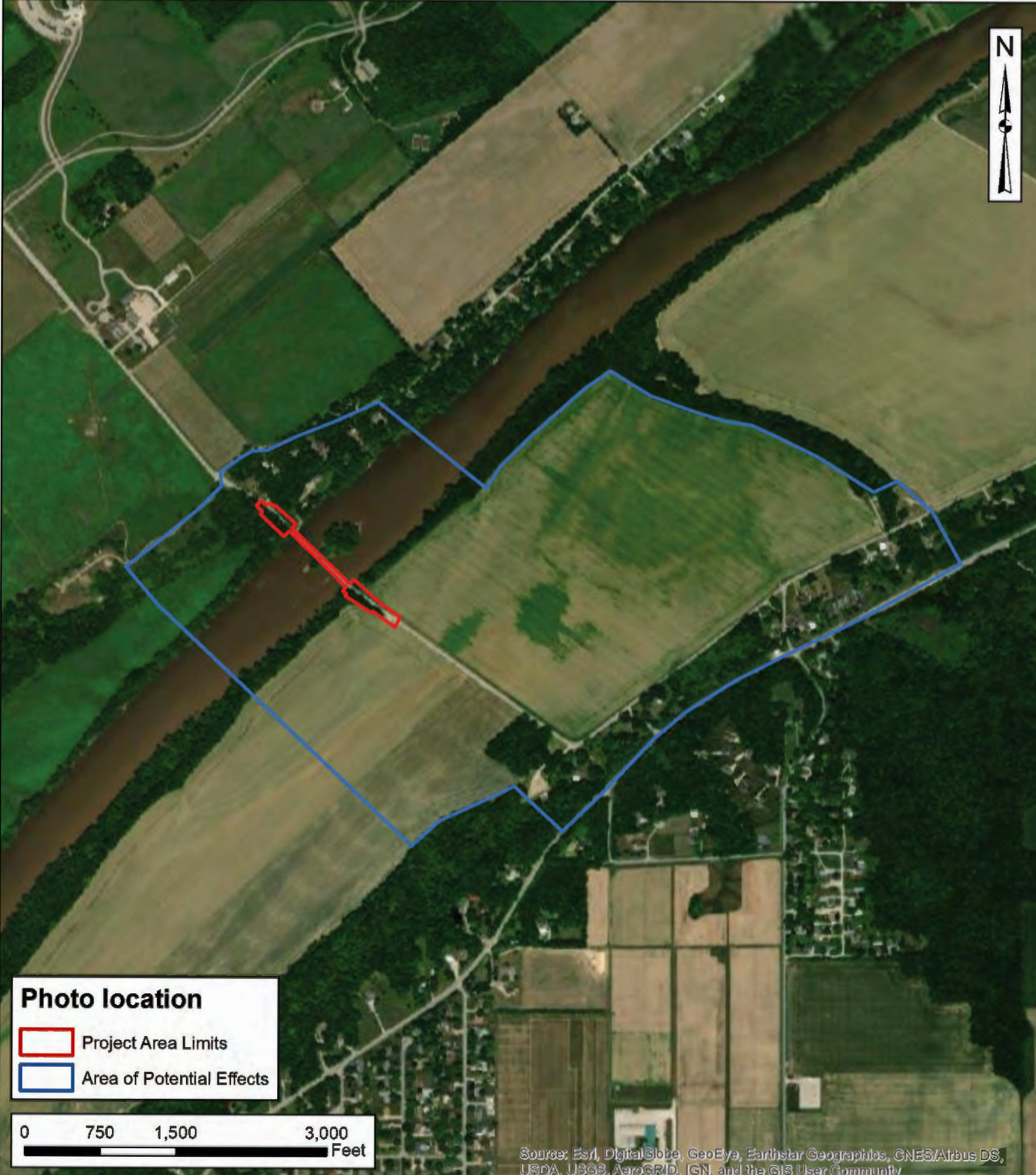
\*Some maps, photographs, and the plan set have been removed to avoid duplication and can be found in Appendix B of this document. The entire document can be made available upon request.





## APPENDIX A

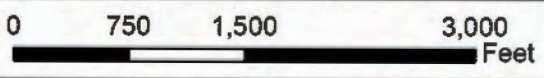
### Maps

\*Some maps have been removed to avoid duplication and can be found in Appendix B of this document.



**Photo location**

-  Project Area Limits
-  Area of Potential Effects



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Des. No. 2002077**

SR 225 Bridge over the Wabash River  
Bridge Rehabilitation  
Tippecanoe County, Indiana



Engineering Quality of Life®

## APPENDIX B

### Photographs

\*The photographs have been removed to avoid duplication and can be found in Appendix B of this document.

## APPENDIX C

### Consulting Parties and Correspondence



## **List of Consulting Parties:**

An early coordination letter (ECL) was sent on April 5, 2022, to the following list (accepted in bold):

### **State Historic Preservation Office (SHPO)**

Indiana Landmarks - Western Regional Office

Lafayette Historic Preservation Commission

Wabash Valley Trust for Historic Preservation

### **Historic Spans Task Force**

### **Historic Hoosier Bridges**

### **HistoricBridges.org**

Historic Bridge Foundation

Tippecanoe County Historian

Tippecanoe County Area Genealogical Society

Tippecanoe County Historical Association

Tippecanoe County Commissioner

Tippecanoe County Highway Supervisor

Tippecanoe County Surveyor

Tippecanoe County Engineer

### **Eastern Shawnee Tribe of Oklahoma**

### **Miami Tribe of Oklahoma**

### **Peoria Tribe of Indians of Oklahoma**

### **Pokagon Band of Potawatomi Indians**

Shawnee Tribe

### **Forest County Potawatomi Community**

## Anne M. Shaw

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**From:** Anne M. Shaw  
**Sent:** Tuesday, April 5, 2022 4:00 PM  
**To:** west@indianalandmarks.org; dcarson@lafayette.in.gov; info@wabashvalleytrust.org; Paul Brandenburg; spansaver@hotmail.com; Nathan@historicbridges.org; kitty@historicbridgefoundation.com; rqrobinson@gmail.com; tipcoasoc@gmail.com; Director@tippecanoehistory.org; tmurtaugh@tippecanoe.in.gov; dbyers@tippecanoe.in.gov; tabrown@tippecanoe.in.gov; tketterer@tippecanoe.in.gov; surveyor@tippecanoe.in.gov  
**Cc:** mkennedy@indot.in.gov; Ahmed, Arshad; Kurtz, Randy; Hillary Shaffer; Tyler Wolf; Brian Shaw; Jessica Chew; Patrick W. Delp; Lillian M. Hutzell; sbranigin@indot.in.gov; Coon, Matthew  
**Subject:** FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana  
**Attachments:** SR 225 over Wabash\_Des 2002077\_ECL\_2022-04-05.pdf

**Des. No.: 2002077**

**Project Description: SR 225 over the Wabash River Bridge Rehabilitation**

**Location: Tippecanoe County, Indiana**

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with a bridge project (scope undetermined), Des. No. 2002077. Clark Dietz, as a sub to Beam, Longest and Neff (BLN), is under contract with INDOT to advance the environmental documentation for the referenced project.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. The following agencies/individuals are being invited to become consulting parties:

State Historic Preservation Office  
Indiana Landmarks - Western Regional Office  
Lafayette Historic Preservation Commission  
Wabash Valley Trust for Historic Preservation  
Historic Spans Task Force  
Historic Hoosier Bridges  
HistoricBridges.org  
Historic Bridge Foundation  
Tippecanoe County Historian  
Tippecanoe County Area Genealogical Society  
Tippecanoe County Historical Association  
Tippecanoe County Commissioner  
Tippecanoe County Highway Supervisor  
Tippecanoe County Surveyor  
Tippecanoe County Engineer  
Eastern Shawnee Tribe of Oklahoma  
Miami Tribe of Oklahoma  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indians  
Shawnee Tribe  
Forest County Potawatomi Community

This letter is part of the early coordination phase of the environmental review process requesting comments associated with this project. We are requesting comments from your area of expertise regarding any possible environmental effects associated with this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

Please review the attached letter, which is also located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE), and respond with your comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If a hard copy of the materials is needed, please respond to this email with your request within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comments. If we do not receive a response from an invited consulting party within the time allotted, the project will proceed consistent with the proposed design. Therefore, if we do not receive a response within thirty (30) days, your agency or organization will not receive any further information on the project unless the scope of work changes.

Tribal contacts may contact Patty Jo Korzeniewski at [pkorzeniewski@indot.in.gov](mailto:pkorzeniewski@indot.in.gov) or 317-416-4377 or Kari Carmany-George at FHWA at [K.CarmanyGeorge@dot.gov](mailto:K.CarmanyGeorge@dot.gov) or 317-226-5629.

Thank you in advance for your input,

Anne Shaw  
Principal Investigator  
Clark Dietz  
8900 Keystone Crossing, Suite 475  
Indianapolis, IN 46240  
[anne.shaw@clarkdietz.com](mailto:anne.shaw@clarkdietz.com)



**Anne M. Shaw**  
Clark Dietz, Inc. 8900 Keystone Crossing, Suite 475, Indianapolis, IN 46240  
p 317.808.3160 / c 859.797.0097  
[anne.shaw@clarkdietz.com](mailto:anne.shaw@clarkdietz.com) / [clarkdietz.com](http://clarkdietz.com)



## Anne M. Shaw

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**From:** Kennedy, Mary <MKENNEDY@indot.IN.gov>  
**Sent:** Tuesday, April 5, 2022 4:11 PM  
**To:** thpo@estoo.net; Diane Hunter; Charla EchoHawk; 'Matthew.Bussler@pokagonband-nasn.gov'; tonya@shawnee-tribe.com; Benjamin Rhodd  
**Cc:** Anne M. Shaw; Korzeniewski, Patricia J; Coon, Matthew; Carmany-George, Karstin (FHWA)  
**Subject:** FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana  
**Attachments:** SR225Wabash\_Des2002077\_Section106ECL\_2022-04-05.pdf

**Des. No.:** 2002077

**Project Description:** SR 225 over the Wabash River Bridge Rehabilitation

**Location:** Tippecanoe County, Indiana

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The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with a bridge project (scope undetermined), Des. No. 2002077. Clark Dietz, as a sub to Beam, Longest and Neff (BLN), is under contract with INDOT to advance the environmental documentation for the referenced project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. The following agencies/individuals are being invited to become consulting parties:

State Historic Preservation Office  
Indiana Landmarks - Western Regional Office  
Lafayette Historic Preservation Commission  
Wabash Valley Trust for Historic Preservation  
Historic Spans Task Force  
Historic Hoosier Bridges  
HistoricBridges.org  
Historic Bridge Foundation  
Tippecanoe County Historian  
Tippecanoe County Area Genealogical Society  
Tippecanoe County Historical Association  
Tippecanoe County Commissioner  
Tippecanoe County Highway Supervisor  
Tippecanoe County Surveyor  
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Eastern Shawnee Tribe of Oklahoma  
Miami Tribe of Oklahoma  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indians  
Shawnee Tribe  
Forest County Potawatomi Community

This letter is part of the early coordination phase of the environmental review process requesting comments associated with this project. We are requesting comments from your area of expertise regarding any possible environmental effects associated with this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.



Please review the attached letter, which is also located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE), and respond with your comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If a hard copy of the materials is needed, please respond to this email with your request within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comments. If we do not receive a response from an invited consulting party within the time allotted, the project will proceed consistent with the proposed design. Therefore, if we do not receive a response within thirty (30) days, your agency or organization will not receive any further information on the project unless the scope of work changes.

Tribal contacts may contact Patty Jo Korzeniewski at [pkorzeniewski@indot.in.gov](mailto:pkorzeniewski@indot.in.gov) or 317-416-4377 or Kari Carmany-George at FHWA at [K.CarmanyGeorge@dot.gov](mailto:K.CarmanyGeorge@dot.gov) or 317-226-5629.

Thank you in advance for your input,

**Mary E. Kennedy**

***Historic Bridge Specialist***

100 N. Senate Ave., Room N758-ES

Indianapolis, IN 46204

**Email:** [mkennedy@indot.in.gov](mailto:mkennedy@indot.in.gov)

**Phone:** 317-694-3607

Typically on site Mon, Tues & Thurs; Remote Weds



\*For the latest updates from INDOT's Cultural Resources Office, subscribe to the Environmental Services listserv: <https://www.in.gov/indot/3217.htm>

\*\*Link to the CRO-Public Web Map App can be found [here](#)



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N758-ES  
Indianapolis, Indiana 46204

PHONE: (855) 463-6848

**Eric Holcomb, Governor**  
**Michael Smith, Commissioner**

April 5, 2022

This letter was sent to the listed parties.

RE: Dual Review Project: Early Coordination Letter, Des. No. 2002077, SR 225 over the Wabash River Bridge Project – Scope Undetermined, Tippecanoe County, Indiana

Dear Consulting Party (see attached list),

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with a bridge project (scope undetermined), Des. No. 2002077. Clark Dietz, as a sub to Beam Longest and Neff (BLN), is under contract with INDOT to advance the environmental documentation for the referenced project.

This letter is part of the early coordination phase of the environmental review process requesting comments associated with this project. We are requesting comments from your area of expertise regarding any possible environmental effects associated with this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

The project involves INDOT Bridge No. 225-79-04016G (NBI No. 029150), carrying SR 225 over the Wabash River. The proposed undertaking is on SR 225 0.60 mile north of old SR 25 in Tippecanoe County, Indiana. It is within Tippecanoe and Washington Townships, Lafayette East USGS Topographic Quadrangle, in Section 25, Township 24 North, Range 4 West and Burnett's Number 3 Section.

The most recent inspection and Bridge Inspection Report indicates there are structural deficiencies that need to be addressed. The deficiencies include:

- The existing bridge deck has cracking, leaching, and spalling with up to 17% delamination per span.
- There is widespread deterioration of the truss members and gusset plates, which is worsened by exposure to roadway runoff. The existing curbs do not protect the truss members from all roadway runoff.
- 161 of the truss and superstructure members do not have a load capacity that meets the Indiana Design Manual (IDM) requirement for load capacity. This results in the bridge having substandard load capacity. Several members are undersized due to the loads in which they were originally designed for and other members have deteriorated which has reduced their capacity. Due to this, the bridge is posted for a low load capacity (12 tons).
- Abutment No. 1 and Abutment No. 5 have cracking and weathering. If this deterioration continues to worsen, it could jeopardize the structural integrity of the abutments.



The purpose of this project is to improve portions of the bridge as required to increase the load capacity of the bridge to meet an HS-15 loading and to protect the members that are at risk of future deterioration. The goals of the project will be met by:

- Addressing the bridge deck cracking, leaching and spalling.
- Protecting the truss elements from roadway runoff and other environmental elements.
- Improving the superstructure members to provide a HS-15 load capacity for the bridge.
- Addressing the abutment deterioration to prevent further deterioration, which could compromise the structural integrity of the bridge.

Temporary and Permanent right-of-way limits and amounts are currently being determined.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. In accordance with 36 CFR 800.2 (c), you are hereby requested to be a consulting party to participate in the Section 106 process. Entities that have been invited to participate in the Section 106 consultation process for this project are identified in the attached list. Per 36 CFR 800.3(f), we hereby request that the Indiana State Historic Preservation Officer (SHPO) notify this office if the SHPO staff is aware of any other parties that may be entitled to be consulting parties or should be contacted as potential consulting parties for the project.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

Per the terms of the "Programmatic Agreement Regarding Management and Preservation of Indiana's Historic Bridges" (Historic Bridges PA), the FHWA-Indiana Division will satisfy its Section 106 responsibilities involving "Select" and "Non-Select" bridges through the Project Development Process (PDP) of the Historic Bridges PA (Stipulation III). Because INDOT Bridge No. 225-79-04016G (NBI 029150) is a "Select" bridge, the procedures outlined in Stipulation III.A of the Historic Bridges PA will be followed to fulfill FHWA's Section 106 responsibilities for the project. (A copy of the Historic Bridges PA can be downloaded here: <http://www.in.gov/indot/2530.htm>).

Please note that per the permanent rule issued by the Indiana Department of Natural Resources effective August 14, 2013 (312 IAC 20-4-11.5), INDOT is requesting that this project be subjected to "dual review"; that is, reviewed by the Division of Historic Preservation and Archaeology simultaneously under 54 U.S.C. 306108 (Section 106) and IC 14-21-1-18 (Indiana Preservation and Archaeology Law dealing with alterations of historic sites and structures requiring a Certificate of Approval). Pursuant to Section 11.5(f) of this rule, at the conclusion of the review process we anticipate that the Division Director would issue a letter of clearance exempting this project from obtaining a Certificate of Approval under IC 14-21-1-18. Enclosed with this letter is a detailed list of the consulting parties, including contact information including email addresses, for processing the dual review submission.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. At this time, no cultural resource investigations have occurred; however, the results of cultural resource identification and evaluation efforts, both above ground and archaeological, will be forthcoming. Consulting parties will receive notification when these reports are completed.

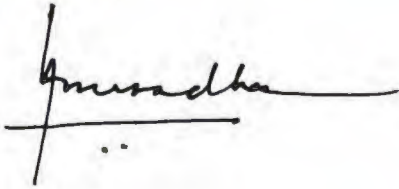
Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party, or if you do not respond, you will not be included on the list of consulting parties for this project. If we do not receive your response in the time allotted, the project will proceed consistent with the proposed design, and you will not receive further information about the project unless the design changes. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

For questions concerning specific project details, you may contact Anne Shaw of Clark Dietz at 859-797-0097 or [anne.shaw@clarkdietz.com](mailto:anne.shaw@clarkdietz.com). All future responses regarding the proposed project should be forwarded to Anne Shaw at the following address:

Anne Shaw  
Principal Investigator  
Clark Dietz  
8900 Keystone Crossing, Suite 475  
Indianapolis, IN 46240  
[anne.shaw@clarkdietz.com](mailto:anne.shaw@clarkdietz.com)

Tribal contacts may contact Patty Jo Korzeniewski at [pkorzeniewski@indot.in.gov](mailto:pkorzeniewski@indot.in.gov) or 317-416-4377 or Kari Carmany-George at FHWA at [K.CarmanyGeorge@dot.gov](mailto:K.CarmanyGeorge@dot.gov) or 317-226-5629.

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

Removed to avoid Redundancy

Enclosures:

Topographic map showing project location  
Aerial map showing project location

Distribution List:

State Historic Preservation Office  
Indiana Landmarks - Western Regional Office - [west@indianalandmarks.org](mailto:west@indianalandmarks.org)  
Lafayette Historic Preservation Commission - [dcarson@lafayette.in.gov](mailto:dcarson@lafayette.in.gov)  
Wabash Valley Trust for Historic Preservation - [info@wabashvalleytrust.org](mailto:info@wabashvalleytrust.org)  
Historic Spans Task Force - [paul@prbrandy.com](mailto:paul@prbrandy.com)  
Historic Hoosier Bridges - [spansaver@hotmail.com](mailto:spansaver@hotmail.com)  
HistoricBridges.org - [Nathan@historicbridges.org](mailto:Nathan@historicbridges.org)  
Historic Bridge Foundation - [kitty@historicbridgefoundation.com](mailto:kitty@historicbridgefoundation.com)  
Tippecanoe County Historian - [rjrobinson@gmail.com](mailto:rjrobinson@gmail.com)  
Tippecanoe County Area Genealogical Society - [tipcoasoc@gmail.com](mailto:tipcoasoc@gmail.com)

[www.in.gov/dot/](http://www.in.gov/dot/)

*An Equal Opportunity Employer*





Tippecanoe County Historical Association - [Director@tippecanoehistory.org](mailto:Director@tippecanoehistory.org)

Tippecanoe County Commissioners - [tmurtaugh@tippecanoe.in.gov](mailto:tmurtaugh@tippecanoe.in.gov); [dbyers@tippecanoe.in.gov](mailto:dbyers@tippecanoe.in.gov);  
[tabrown@tippecanoe.in.gov](mailto:tabrown@tippecanoe.in.gov)

Tippecanoe County Highway Supervisor - [highway@tippecanoe.in.gov](mailto:highway@tippecanoe.in.gov)

Tippecanoe County Surveyor - [surveyor@tippecanoe.in.gov](mailto:surveyor@tippecanoe.in.gov)

Eastern Shawnee Tribe of Oklahoma

Miami Tribe of Oklahoma

Peoria Tribe of Indians of Oklahoma

Pokagon Band of Potawatomi Indians

Shawnee Tribe

Forest County Potawatomi Community

## Anne M. Shaw

---

**From:** Paul Brandenburg <paul@prbrandy.com>  
**Sent:** Tuesday, April 5, 2022 7:18 PM  
**To:** Anne M. Shaw  
**Subject:** RE: FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana

Please include me as a Consulting Party on this project.

Thanks,

Paul

---

**From:** Anne M. Shaw <Anne.Shaw@clarkdietz.com>  
**Sent:** Tuesday, April 5, 2022 4:00 PM  
**To:** west@indianalandmarks.org; dcarson@lafayette.in.gov; info@wabashvalleytrust.org; Paul Brandenburg <paul@prbrandy.com>; spansaver@hotmail.com; Nathan@historicbridges.org; kitty@historicbridgefoundation.com; rqrobinson@gmail.com; tipcoasoc@gmail.com; Director@tippecanoehistory.org; tmurtaugh@tippecanoe.in.gov; dbyers@tippecanoe.in.gov; tabrown@tippecanoe.in.gov; tketterer@tippecanoe.in.gov; surveyor@tippecanoe.in.gov  
**Cc:** mkennedy@indot.in.gov; Ahmed, Arshad <ArAhmed@indot.IN.gov>; Kurtz, Randy <RKurtz@indot.IN.gov>; Hillary Shaffer <hshaffer@b-l-n.com>; Tyler Wolf <twolf@b-l-n.com>; Brian Shaw <bshaw@b-l-n.com>; Jessica Chew <jchew@b-l-n.com>; Patrick W. Delp <Patrick.Delp@clarkdietz.com>; Lillian M. Hutzell <Lillian.Hutzell@clarkdietz.com>; sbranigin@indot.in.gov; Coon, Matthew <mcoon@indot.IN.gov>  
**Subject:** FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana

**Des. No.: 2002077**

**Project Description: SR 225 over the Wabash River Bridge Rehabilitation**

**Location: Tippecanoe County, Indiana**

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with a bridge project (scope undetermined), Des. No. 2002077. Clark Dietz, as a sub to Beam, Longest and Neff (BLN), is under contract with INDOT to advance the environmental documentation for the referenced project.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. The following agencies/individuals are being invited to become consulting parties:

State Historic Preservation Office  
Indiana Landmarks - Western Regional Office  
Lafayette Historic Preservation Commission  
Wabash Valley Trust for Historic Preservation  
Historic Spans Task Force  
Historic Hoosier Bridges  
HistoricBridges.org  
Historic Bridge Foundation  
Tippecanoe County Historian  
Tippecanoe County Area Genealogical Society  
Tippecanoe County Historical Association  
Tippecanoe County Commissioner  
Tippecanoe County Highway Supervisor

## Anne M. Shaw

---

**From:** Tony Dillon <spansaver@hotmail.com>  
**Sent:** Tuesday, April 5, 2022 6:06 PM  
**To:** Anne M. Shaw; west@indianalandmarks.org; dcarson@lafayette.in.gov; info@wabashvalleytrust.org; Paul Brandenburg; Nathan@historicbridges.org; kitty@historicbridgefoundation.com; rqrobinson@gmail.com; tipcoasoc@gmail.com; Director@tippecanoehistory.org; tmurtaugh@tippecanoe.in.gov; dbyers@tippecanoe.in.gov; tabrown@tippecanoe.in.gov; tketterer@tippecanoe.in.gov; surveyor@tippecanoe.in.gov  
**Cc:** mkennedy@indot.in.gov; Ahmed, Arshad; Kurtz, Randy; Hillary Shaffer; Tyler Wolf; Brian Shaw; Jessica Chew; Patrick W. Delp; Lillian M. Hutzell; sbranigin@indot.in.gov; Coon, Matthew  
**Subject:** Re: FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana

Anne,

Please include me as a consulting party on this project.

Thanks,  
Tony

*Tony Dillon  
Historic Hoosier Bridges  
208 North 17th Street  
New Castle, IN 47362  
(765)624-6558  
spansaver@hotmail.com*

---

**From:** Anne M. Shaw <Anne.Shaw@clarkdietz.com>  
**Sent:** Tuesday, April 5, 2022 3:59 PM  
**To:** west@indianalandmarks.org <west@indianalandmarks.org>; dcarson@lafayette.in.gov <dcarson@lafayette.in.gov>; info@wabashvalleytrust.org <info@wabashvalleytrust.org>; Paul Brandenburg <paul@prbrandy.com>; spansaver@hotmail.com <spansaver@hotmail.com>; Nathan@historicbridges.org <Nathan@historicbridges.org>; kitty@historicbridgefoundation.com <kitty@historicbridgefoundation.com>; rqrobinson@gmail.com <rqrobinson@gmail.com>; tipcoasoc@gmail.com <tipcoasoc@gmail.com>; Director@tippecanoehistory.org <Director@tippecanoehistory.org>; tmurtaugh@tippecanoe.in.gov <tmurtaugh@tippecanoe.in.gov>; dbyers@tippecanoe.in.gov <dbyers@tippecanoe.in.gov>; tabrown@tippecanoe.in.gov <tabrown@tippecanoe.in.gov>; tketterer@tippecanoe.in.gov <tketterer@tippecanoe.in.gov>; surveyor@tippecanoe.in.gov <surveyor@tippecanoe.in.gov>  
**Cc:** mkennedy@indot.in.gov <mkennedy@indot.in.gov>; Ahmed, Arshad <ArAhmed@indot.IN.gov>; Kurtz, Randy <RKurtz@indot.IN.gov>; Hillary Shaffer <hshaffer@b-l-n.com>; Tyler Wolf <twolf@b-l-n.com>; Brian Shaw <bshaw@b-l-n.com>; Jessica Chew <jchew@b-l-n.com>; Patrick W. Delp <Patrick.Delp@clarkdietz.com>; Lillian M. Hutzell <Lillian.Hutzell@clarkdietz.com>; sbranigin@indot.in.gov <sbranigin@indot.in.gov>; Coon, Matthew <mcoon@indot.IN.gov>  
**Subject:** FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana



**Anne M. Shaw**

---

**From:** Nathan Holth <nathan@historicbridges.org>  
**Sent:** Tuesday, April 5, 2022 4:42 PM  
**To:** Anne M. Shaw; west@indianalandmarks.org; dcarson@lafayette.in.gov; info@wabashvalleytrust.org; Paul Brandenburg; spansaver@hotmail.com; kitty@historicbridgefoundation.com; rqrobinson@gmail.com; tipcoasoc@gmail.com; Director@tippecanoehistory.org; tmurtaugh@tippecanoe.in.gov; dbyers@tippecanoe.in.gov; tabrown@tippecanoe.in.gov; tketterer@tippecanoe.in.gov; surveyor@tippecanoe.in.gov  
**Cc:** mkennedy@indot.in.gov; Ahmed, Arshad; Kurtz, Randy; Hillary Shaffer; Tyler Wolf; Brian Shaw; Jessica Chew; Patrick W. Delp; Lillian M. Hutzell; sbranigin@indot.in.gov; Coon, Matthew  
**Subject:** Re: FHWA Project: Des. No. 2002077; ECL, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana

Please include me as a Consulting Party on this project.

Thanks,

-Nathan Holth

=====  
**Nathan Holth**

Author/ Photographer/Webmaster

-----HistoricBridges.org-----

*"Promoting the Preservation Of Our Transportation Heritage"*

-----  
[nathan@historicbridges.org](mailto:nathan@historicbridges.org)

[www.historicbridges.org](http://www.historicbridges.org)

=====  
**Disclaimer:** [HistoricBridges.org](http://HistoricBridges.org) is a volunteer group of private citizens. [HistoricBridges.org](http://HistoricBridges.org) is NOT a government agency, does not represent or work with any governmental agencies, nor is it in any way associated with any government agency or any non-profit organization. While we strive for accuracy in our factual content, [HistoricBridges.org](http://HistoricBridges.org) offers no guarantee of accuracy. Opinions and commentary are the opinions of the respective [HistoricBridges.org](http://HistoricBridges.org) member who made them and do not necessarily represent the views of anyone else. [HistoricBridges.org](http://HistoricBridges.org) does not bear any responsibility for any consequences resulting from the use of this communication or any other [HistoricBridges.org](http://HistoricBridges.org) information. Owners and users of bridges have the responsibility of correctly following all applicable laws, rules, and regulations, regardless of any [HistoricBridges.org](http://HistoricBridges.org) communications or information.  
=====

----- Original Message -----

From: "Anne M. Shaw" <[Anne.Shaw@clarkdietz.com](mailto:Anne.Shaw@clarkdietz.com)>

To: "[west@indianalandmarks.org](mailto:west@indianalandmarks.org)" <[west@indianalandmarks.org](mailto:west@indianalandmarks.org)>; "[dcarson@lafayette.in.gov](mailto:dcarson@lafayette.in.gov)" <[dcarson@lafayette.in.gov](mailto:dcarson@lafayette.in.gov)>; "[info@wabashvalleytrust.org](mailto:info@wabashvalleytrust.org)" <[info@wabashvalleytrust.org](mailto:info@wabashvalleytrust.org)>; "Paul Brandenburg" <[paul@prbrandy.com](mailto:paul@prbrandy.com)>; "[spansaver@hotmail.com](mailto:spansaver@hotmail.com)" <[spansaver@hotmail.com](mailto:spansaver@hotmail.com)>;





## Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355  
Ph: (918) 541-1300 • Fax: (918) 542-7260  
www.miamination.com



Via email: pkorzeniewski@indot.in.gov

April 6, 2022

Ms. Patricia Jo Korzeniewski  
Cultural Resources Office  
Indiana DOT  
575 North Pennsylvania Street  
Indianapolis, IN 46204

Re: Des. No. 2002077; SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana – Comments of the Miami Tribe of Oklahoma

Dear Ms. Korzeniewski:

Aya, kikwehsitoole – I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Des. No. 2002077.

The Miami Tribe is not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site; however, very near the project are historically significant Prophetstown and the site of the Battle of Tippecanoe. Given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Indiana, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966 or by email at [dhunter@miamination.com](mailto:dhunter@miamination.com) to initiate consultation.

The Miami Tribe accepts the invitation to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer I am the point of contact for all Section 106 consultation.

Respectfully,

Diane Hunter  
Tribal Historic Preservation Officer



## PEORIA TRIBE OF INDIANS OF OKLAHOMA

118 S. Eight Tribes Trail (918) 540-2535 FAX (918) 540-2538

P.O. Box 1527

MIAMI, OKLAHOMA 74355

CHIEF  
Craig Harper

SECOND CHIEF  
Rosanna Dobbs

April 6, 2022

Patricia Korzeniewski  
Tribal Contact  
INDOT  
100 N Senate Ave., Rm N642  
Indianapolis, IN 46204

Re: DES#2002077; SR255 over Wabash River Bridge Project, Tippecanoe County

Thank you for providing notice of the referenced project. The Peoria Tribe of Indians of Oklahoma is unaware of a direct link to the newly proposed project location.

The Peoria Tribe of Indians of Oklahoma is also unaware of items covered under Native American Graves Protection and Repatriation Act (NAGPRA) to be associated with the proposed project site, including funerary or sacred objects; objects of cultural patrimony; or ancestral human remains.

The Peoria Tribe has no objection at this time to the proposed project. If, however, at any time items are discovered which fall under the protection of NAGPRA, the Peoria Tribe requests immediate notification and consultation. In addition, state, local and tribal authorities should be advised as to the findings and construction halted until consultation with all concerned parties has occurred.

Please feel free to contact me directly at the number above if additional consultation is necessary. Thank you again for your consideration with this matter.

Sincerely,

Charla K. EchoHawk  
Director of Cultural Preservation

TREASURER  
Hank Downum

SECRETARY  
Tonya Mathews

FIRST COUNCILMAN  
Carolyn Ritchey

SECOND COUNCILMAN  
Kara North

THIRD COUNCILMAN  
Isabella Burrell





April 14, 2022

Anne Shaw  
Principal Investigator  
Clark Dietz  
8900 Keystone Crossing, Suite 475  
Indianapolis, Indiana 46240

State Agency: Indiana Department of Transportation (“INDOT”),  
Federal Agency: Federal Highway Administration, Indiana Division (“FHWA”)

Re: DUAL REVIEW: Early coordination letter and proposal for Dual Review for the SR 225 over the  
Wabash River Bridge Project, Scope undetermined (Des. No. 2002077; DHPA No. 29044)

Dear Ms. Shaw:

The Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (“DNR-DHPA”), which also serves as the staff of the Indiana State Historic Preservation Officer (“Indiana SHPO”), is in receipt of INDOT’s early coordination letter, dated April 5, 2022, transmitting your proposal for a dual review, pursuant to 312 Indiana Administrative Code (“IAC”) 20-4-11.5, of the aforementioned project in Tippecanoe and Washington townships, Tippecanoe County, Indiana. We received this submission on April 5, 2022.

The Indiana SHPO/DNR-DHPA will review the information submitted under Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), implementing regulations at 36 C.F.R. Part 800, as well as Indiana Code 14-21-1-18 and 312 IAC 20-4. By copy of this letter, DNR-DHPA is providing notification of the commencement of the dual review to interested persons and members of the Indiana Historic Preservation Review Board (“Review Board”). Notice of the commencement will also be posted on the division’s website (<https://www.in.gov/dnr/historic-preservation/help-for-professionals/check-project-status/>).

For the purposes of Indiana Code 14-21-1-18 and 312 IAC 20-4, we have added the members of the Review Board and additional, potentially interested parties to the list of parties we intend to copy with our comment letters. Anyone receiving an e-mailed copy of this letter who *does not wish to receive future copies of our correspondence about this project* is asked to reply by e-mail to [dkauffmann@dnr.IN.gov](mailto:dkauffmann@dnr.IN.gov) and advise us that he or she does not wish to receive any further copies of our e-mails on this project.

In your next regular submission, please include which consulting parties agree to participate in the consultation of this dual review.

We see in INDOT’s April 5, 2022, letter that FHWA will satisfy its Section 106 responsibilities involving “Select” and “Non-Select” bridges through the Project Development Process of the “Programmatic Agreement Regarding Management and Preservation of Indiana’s Historic Bridges.” We note within the *Indiana Historic Bridge Inventory*, the SR 225 Bridge (INDOT Bridge No. 225-79-04016G; NBI 029150) is listed as eligible for listing in the National Register of Historic Places and classified as a “Select” bridge.

As INDOT’s April 5, 2022, letter indicates, additional information regarding above-ground historic resources and archaeological resources are forthcoming. Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.

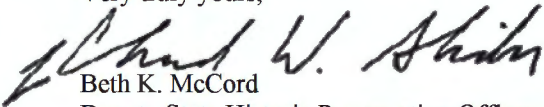


For the benefit of those recipients of a copy of this letter who are not Section 106 consulting parties, please be aware that a copy of INDOT's April 5, 2022, letter can be found online at [http://erms.indot.in.gov/Section 106Documents/](http://erms.indot.in.gov/Section%20106Documents/). From there, search by this project's designation number: 2002077.

If you have questions regarding our dual review of the aforementioned project, please contact DNR-DHPA. Questions about archaeological issues should be directed to contact Wade T. Tharp at (317) 232-1650 or [wtharp1@dnr.IN.gov](mailto:wtharp1@dnr.IN.gov). Questions about historic buildings or structures pertaining to this review should be directed to Danielle Kauffmann at (317) 232-0582 or [dkauffmann@dnr.IN.gov](mailto:dkauffmann@dnr.IN.gov).

In all future correspondence regarding the dual review of this SR 225 over the Wabash River Bridge Project, scope undetermined, in Tippecanoe County (Des. No. 2002077), please refer to DHPA No. 29044.

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer  
Director, Division of Historic Preservation and Archaeology

BKM:DMK:dmk

EMC to federal and state agency or consultant staff members:

Kari Carmany-George, FHWA  
Anuradha Kumar, INDOT  
Mary Kennedy, INDOT  
Matt Coon, INDOT  
Susan Branigin, INDOT  
Anne Shaw, Clark Dietz  
Danielle Kauffmann, DNR-DHPA  
Wade Tharp, DNR-DHPA

EMC to Indiana Historic Preservation Review Board Members:

J. Scott Keller, Review Board  
Daniel Kloc, AIA, Review Board  
Jason Larrison, AIA, Review Board  
Chandler Lighty, Review Board  
Beth K. McCord, DNR-DHPA, Review Board  
Ryan Mueller, Deputy Director, DNR, and Chairman, Review Board  
Anne Shaw, Review Board  
April Sievert, Ph.D., Review Board

EMC to potentially interested persons:

Indiana Landmarks, Western Regional Office  
Lafayette Historic Preservation Commission  
Wabash Valley Trust for Historic Preservation  
Tippecanoe County Historian  
Tippecanoe County Area Genealogical Society  
Tippecanoe County Historical Association  
Tippecanoe County Commissioners  
Tippecanoe County Highway Supervisor  
Tippecanoe County Surveyor  
Paul Brandenburg, Indiana Historic Spans Task Force  
Tony Dillon, Historic Hoosier Bridges  
Kitty Henderson, Historic Bridge Foundation  
Nathan Holth, [historicbridges.org](http://historicbridges.org)



**EASTERN SHAWNEE  
CULTURAL PRESERVATION DEPARTMENT**

70500 East 128 Road, Wyandotte, OK 74370

April 26, 2022

INDOT - Indiana Department of Transportation  
100 N. Senate Ave. IGCN642  
Indianapolis, IN 46201

**RE: *Des No. 2002077, Tippecanoe County, Indiana***

Dear Ms. Korzeniewski,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Tippecanoe County, Indiana. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

A handwritten signature in blue ink that reads "Paul Barton".

Paul Barton, Tribal Historic Preservation Officer (THPO)  
Eastern Shawnee Tribe of Oklahoma  
(918) 666-5151 Ext:1833  
THPO@estoo.net





## Pokégnek Bodéwadmik

POKAGON BAND OF POTAWATOMI  
HISTORY & CULTURE CENTER

05/05/2022

Mary E. Kennedy  
Historic Bridge Specialist  
100 N. Senate Ave., Room N758-ES  
Indianapolis, IN 46204  
Email: [mkennedy@indot.in.gov](mailto:mkennedy@indot.in.gov)  
Phone: 317-694-3607

FHWA Project Des. No. 2002077

Dear Responsible Party:

Migwëthh for contacting me regarding this project. As THPO, I am responsible for handling Section 106 Consultations on behalf of the tribe. I am writing to inform you that I have reviewed the details for the project referenced above. The proposed work is occurring within a mile of known archaeological sites, historic sites or features that are considered sensitive or recorded in the Pokagon Band Historic Inventory Database. I have made the determination that the project will have **No Adverse Effect** on any historic, religious, or culturally significant resources to the Pokagon Band of Potawatomi Indians.

If any cultural or archaeological resources are uncovered during construction, please stop work, and contact me immediately. Should you have any other questions, please don't hesitate to contact me at your earliest convenience.

Sincerely,

Matthew J.N. Bussler  
Tribal Historic Preservation Officer  
Pokagon Band of Potawatomi Indians  
Office: (269) 462-4316  
Cell: (269) 519-0838  
[Matthew.Bussler@Pokagonband-nsn.gov](mailto:Matthew.Bussler@Pokagonband-nsn.gov)



**From:** [Anne M. Shaw](#)  
**To:** [Paul Brandenburg](#); [spansaver@hotmail.com](mailto:spansaver@hotmail.com); [Nathan Holth](#)  
**Cc:** [mkennedy@indot.in.gov](mailto:mkennedy@indot.in.gov); [sbranigin@indot.in.gov](mailto:sbranigin@indot.in.gov); [Coon, Matthew](#); [Tyler Wolf](#); [Hillary Shaffer](#); [Ahmed, Arshad](#); [Lillian M. Hutzell](#); [Patrick W. Delp](#); [Brian Shaw](#)  
**Subject:** FHWA Project: Des. No. 2002077; HBAA, SR 225 over the Wabash River Bridge Rehabilitation, Tippecanoe County, Indiana  
**Date:** Monday, June 27, 2022 4:03:08 PM

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**Des. No.:** 2002077

**Project Description:** SR 225 over Wabash River Bridge Rehabilitation

**Location:** Tippecanoe Township, Tippecanoe County, Indiana

The Indiana Department of Transportation, with funding from the Federal Highway Administration, proposes to proceed with a Bridge Rehabilitation on SR 225 over the Wabash River (Bridge No. 225-79-04016G; Des. No. 2002077). The Section 106 Early Coordination Letter for this project was originally distributed on April 5, 2022.

As part of Section 106 of the National Historic Preservation Act, an Historic Bridge Alternatives Analysis Report has been prepared and is ready for review and comment by consulting parties.

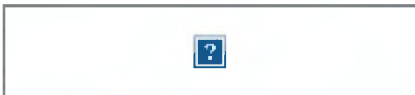
Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE), and respond with any comments that you may have. If a hard copy of the materials is needed, please respond to this email with your request within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment.

Tribal Contacts please respond to INDOT's Tribal Liaison, Patty Jo Korzeniewski at [pkorzeniewski@indot.in.gov](mailto:pkorzeniewski@indot.in.gov) (317-416-4377) with any responses pertaining to this project including to provide INDOT/Indiana FHWA additional information about Tribal resources/concerns and questions/comments regarding cultural resources. The FHWA point of contact is Kari Carmany-George at [K.CarmanyGeorge@dot.gov](mailto:K.CarmanyGeorge@dot.gov) (317-226-5629).

Thank you in advance for your input,

Anne Shaw



**Anne M. Shaw**

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