



MID-STATES CORRIDOR

TIER 1 RECORD OF DECISION

Mid-States Corridor Tier 1 Environmental Impact Statement

Prepared for
Indiana Department of Transportation
Mid-States Corridor Regional Development Authority

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1. BACKGROUND

1.1 Previous Studies

Prior to initiation of the Mid-States Corridor Project (Project), five earlier studies recognized the need for significant north-south transportation improvements in this Southern Indiana region. Some emphasized major transportation improvements in the US 231 corridor. The need to support freight and logistics were key factors considered in these studies. These studies were published between 2004 and 2018. They are described in the FEIS, Volume I, **Section 1.3 – Previous Studies**.

1.2 Project Initiation

This project began with the issuance of the Notice of Intent (NOI) in the Federal Register on July 5, 2019. The NOI announced that a Tier 1 EIS would be prepared for “proposed highway corridors to improve access to Southern Indiana population, manufacturing, and multimodal centers (e.g., river barge and rail connections).” The NOI specified one terminus as US 231 at the SR 66 intersection at the Indiana end of the Natcher Bridge crossing of the Ohio River near Rockport, Indiana. It specified the other terminus as either I-69 or SR 37 at a location south of the intersection of these two routes in Monroe County, Indiana. It further stated, “The Tier 1 document will include in-depth analysis of environmental, transportation, and economic impacts, as well as cost estimates. This document will provide the basis for FHWA to grant location approval for a specific corridor.”

1.3 Tiered Approach

The NOI states that a tiered process is being used to conduct the environmental reviews required under NEPA and other laws for the Project. CEQ and FHWA regulations allow NEPA studies for large, complex projects to be carried out in a two-staged, “tiered” process. In the first tier, the “big picture” issues are addressed, while taking into account the full range of impacts. In Tier 2, the focus shifts to issues associated with a more refined determination of impacts, and the avoidance and mitigation of adverse impacts. The difference in focus is one of degree.

The Project has a 12-county Study Area which is over 4,700 square miles. Consultations between INDOT and FHWA determined that a tiered process was appropriate for a project of this size. The “big picture” issues the Tier 1 EIS was intended to resolve are: (1) whether to complete the Project; (2) the location of the project corridor; (3) the type of facility and (4) logical termini for “projects of independent utility” with the preferred corridor.

FEIS, Volume I, **Section 2.1 – Process Overview** gives details of the basis for using a tiered process for the Project.

2. DECISION

The selected alternative is Refined Preferred Alternative P (RPA P). It is illustrated in Figure 1. RPA P is divided into five Sections of Independent Utility (SIUs). SIU 4 at Loogootee has four variations. As



described in **Section 2.1.10.4**, a single variation will be selected in Tier 2 studies. These are also portrayed in Figure 1. These are designated as Variation P1 through P4, from west to east. Figure 3 labels these variations in SIU 4. Nine local improvements along existing US 231 also are part of RPA P. Their conceptual locations are shown in Figure 2. As described in **Section 2.1.10.4**, their exact locations will be finalized in Tier 2 studies. See also FEIS **Section 2.5.2 – Route Variations at Loogootee**.

2.1 Build Decision and Corridor Selection

This Record of Decision approves the selection of the alternative that was identified in the FEIS as Refined Preferred Alternative P (RPA P). This alternative is a corridor, generally 2,000 feet in width, within which specific alignments will be developed during Tier 2 studies. RPA P also includes local improvements on portions of existing US 231. These are described further in **Section 2.1.9**.

2.1.1 Selection of Build Alternative

This Record of Decision approves the selection of a “Build” alternative for the Mid-States Corridor project between US 231/SR 66 and I-69 at the US 231 Interchange.

2.1.2 Location of Corridor

The location of the selected corridor is depicted in FEIS Volume III, *Environmental Atlas*. This selected corridor connects Rockport, Huntingburg, Jasper, Haysville, Loogootee and NSA Crane. The southern terminus is at US 231/SR 66. The northern terminus is at the I-69 interchange at US 231.

2.1.3 Corridor Width

The selected corridor is generally 2,000 feet in width. This corridor is narrower than 2,000 feet in some locations, in order to ensure minimization of impacts on certain sensitive resources in Tier 2. The corridor is wider than 2,000 feet in one location, in order to maximize opportunities for the development of avoidance alternatives. Specifically, as depicted in FEIS Volume III, *Environmental Atlas*, the selected RPA P corridor is: (1) narrower from the I-64 interchange to south of Dubois County Road 1000 South; (2) narrower as it passes to the east of Buffalo Flat Nature Preserve; (3) narrower as it passes to the west of Haysville; (4) narrower as it crosses the East Fork White River at the Martin/Dubois County line; (5) wider between south of US Highway 50 to north of Daviess County Road 250 North (variation RPA P1); (6) narrower through Loogootee between south of US Highway 50 to north of Goodwill Cemetery (variation RPA P2); (6) narrower where it passes east of Saint John’s Cemetery east of Loogootee (variation RPA P3); (7) narrower where it passes southeast of West Boggs Park (variation RPA P1); (8) narrower where it passes west of the southwest corner of Crane Naval Weapons Support Center; (9) narrower at the Second Mount Olive Baptist Church and Cemetery at Daviess County Road 1325 North and (10) narrower from just south of Greene/Daviess County line to I-69. These areas are depicted in **Volume III – Environmental Atlas** in this FEIS/ROD.

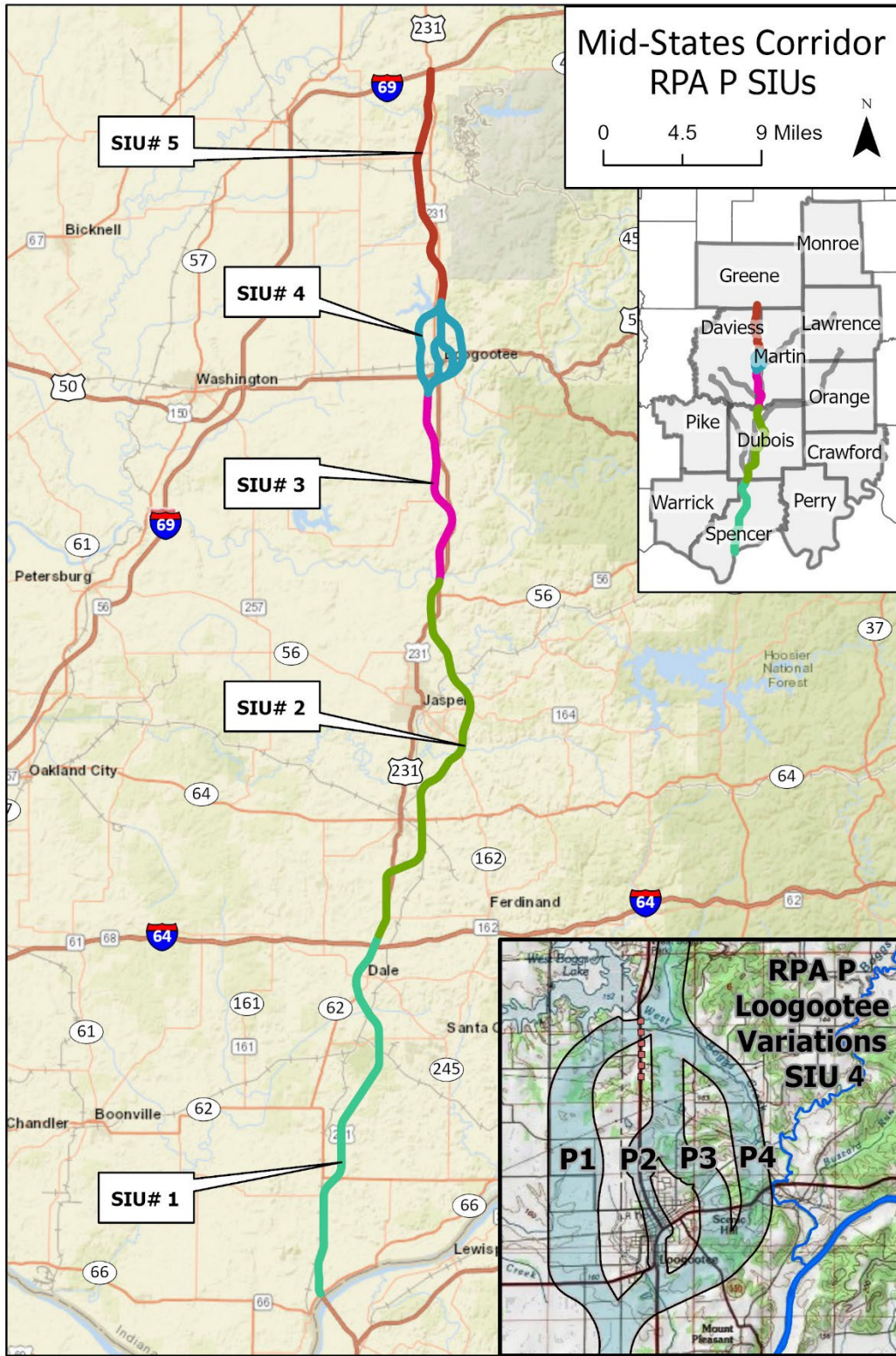


Figure 1: Selected Alternative Showing Tier 2 Sections

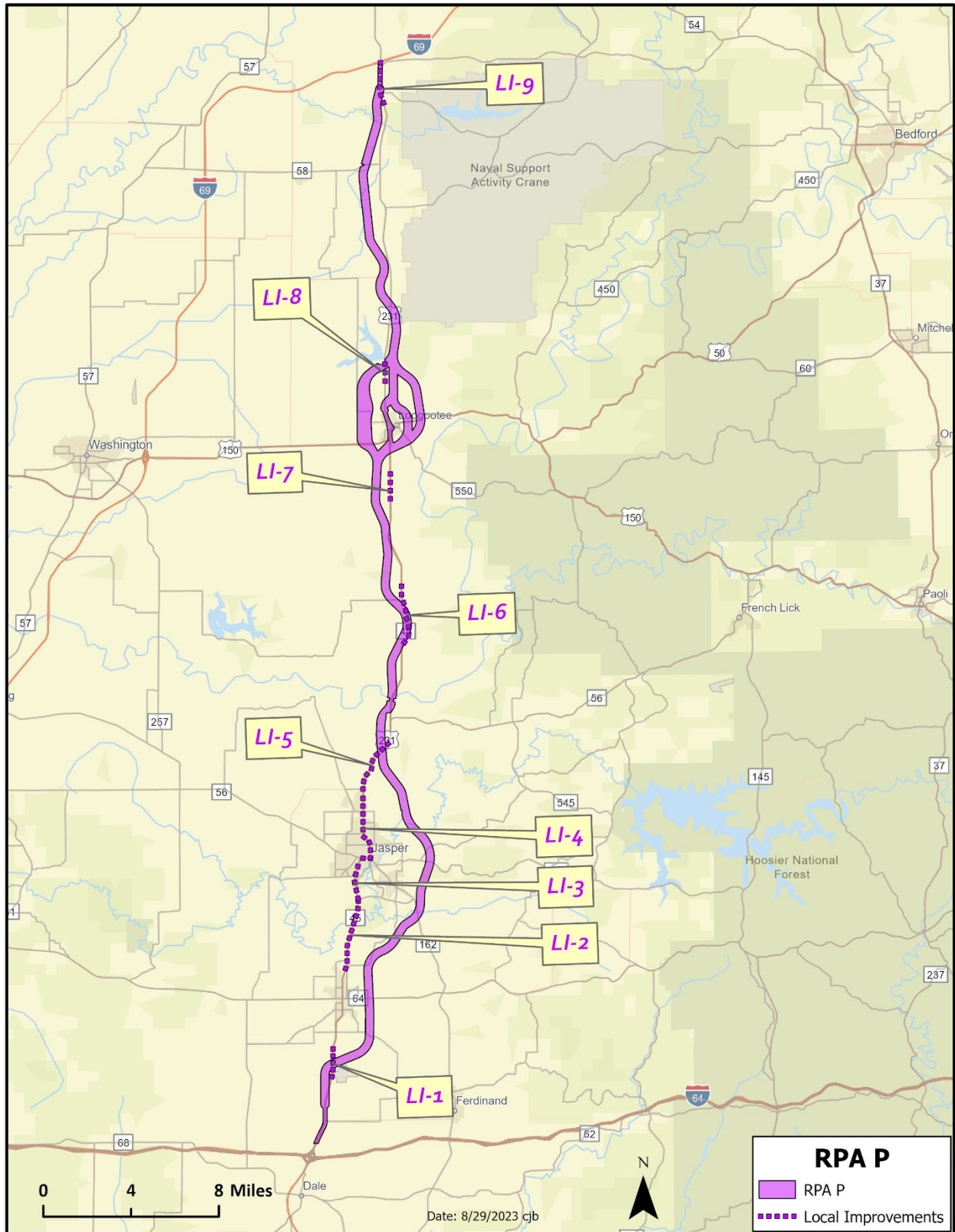


Figure 2: Local Improvements for Selected Alternative



2.1.4 Range of Facility Types

With the exception of Alternative R and RPA P2, all alternatives were analyzed as both expressways and Super-2 highways. For this project, an expressway is a highway with multiple travel lanes (at least two) in each direction of travel, a median separating roadways in opposite directions and access provided by a combination of interchanges and at-grade intersections with state and local roads. For this project, a Super-2 highway has one travel lane in each direction, a passing/auxiliary lane the length of the alternative and access primarily via at-grade intersections.

Early during this study, a freeway facility type also was considered. A freeway has similar characteristics to an expressway, differing in that access is provided only at interchanges. See FEIS, Volume I, **Section 2.4 – Finalizing Alternatives Carried Forward for Detailed Study**, which explains that freeways were dropped from consideration due to their higher costs and impacts.

Alternative R is an upgrade of existing US 231 between I-64 and I-69. It was considered as a preliminary alternative, but not carried forward during the Screening of Alternatives. See FEIS, Volume I, **Section 2.3 – Screening of Preliminary Alternatives**. Comments were received on the DEIS which stated that this alternative was preferable to any alternative analyzed in the DEIS because it would offer comparable benefits to other alternatives but with lower costs and impacts. In response to these comments Alternative R was reconsidered and analyzed in the FEIS at the same level of detail as other alternatives. To avoid higher impacts along the existing US 231 alignment, Alternative R was considered only as a Super-2 highway. For the same reason, the passing lane was provided only at some locations, and not the length of the alternative.

Based on comments received regarding the Preferred Alternative P in response to the DEIS, refinements to the alternative were incorporated including a variation following existing US 231 through Loogootee (RPA P2 see Figure 3). To avoid higher impacts along the existing US 231 alignment, the RPA P2 variation was considered only as a Super-2 highway.

2.1.5 Working Alignment

The environmental impact calculations in the FEIS were based on working alignments, as described in the FEIS, Vol. I, **Section 3.1 – Environmental Resource Analysis Approach**. The working alignments were used in the Tier 1 study solely for the purpose of estimating potential impacts, benefits and costs. Decisions regarding the specific alignment for the project will be made in Tier 2 and will be further refined during the design phase following Tier 2.

2.1.6 Typical Cross-Sections

The environmental impact calculations in the FEIS were based on the typical cross-sections contained in the FEIS, Vol. II, **Appendix E – Cost Estimating**. The typical cross-sections used in the Tier 1 study were used solely for the purpose of estimating potential impacts, benefits and costs. Decisions regarding the cross-sections for the project (including auxiliary elements such as local access roads) will be made in Tier 2. Decisions regarding cross-sections will be refined during the design phase following Tier 2.

2.1.7 Access Treatments

The FEIS assumed local access treatments, including access roads, grade separations and interchanges for purposes of calculating impacts. Their footprints are used to calculate costs and impacts of each alternative. Decisions regarding local access treatments, as well as grade separations and interchanges, will be made in Tier 2, and are not being made in this Record of Decision. Decisions made in Tier 2



regarding access points and configurations, including interchanges and grade separations, will be further refined during final design.

2.1.8 Property Acquisition

This Record of Decision approves the use of federal funds for property acquisition for the project to the extent that such acquisitions meet the conditions for a hardship or protective acquisition, as defined in applicable FHWA regulations. Federally funded hardship or protective acquisitions implemented pursuant to this Record of Decision will require prior FHWA approval and appropriate documentation. This Record of Decision also approves federally funded acquisition of property for mitigation purposes, as described in **Section 5.2**. This Record of Decision does not affect INDOT's authority to proceed with state-funded acquisitions, which may be credited toward the State's share of project costs pursuant to FHWA regulations.

2.1.9 Local Improvements

Agency comments requested consideration of upgrades of existing highways to serve as components of project alternatives. In response to these comments, FEIS, Vol. II **Appendix V – Local Improvements Analysis** describes how existing parallel highways were evaluated as potential components of each alternative. This evaluation showed that such upgrades generally would not offer cost advantages and would be more impactful to existing businesses and residences, as well as negatively impact existing access. One variation of Alternative P which used significant portions of US 231 was analyzed in detail, and it was determined that it performed poorly on core goals.

This analysis did identify that there were some improvements to existing highways associated with each alternative which would offer local safety and congestion benefits. The costs, benefits and impacts of each alternative included those of the associated local improvements. See FEIS, Vol. I **Section 2.4.2.2 – Consideration of Localized Improvements** for a listing of the local improvements. The depiction of the local improvements in FEIS, Vol. III, *Environmental Atlas* is conceptual. Their exact location and design would be determined in subsequent Tier 2 studies.

As part of this Record of Decision, Local Improvements LI-1 through LI-9 are approved as part of the selected alternative RPA P. See also **Sections 2.1.10.4** and **3.3.1.2** of this Record of Decision.

Localized improvements not associated with the selected alternative will not be developed as a part of Mid-States Corridor Tier 2 activities. These may be evaluated for further development through INDOT's annual project evaluation process. Although these localized improvements were individually associated with the new routes, selection of RPA P does not "reject" a separate need for any of the other localized improvements. Localized improvements not associated with a RPA P may be identified as an independent need as part of INDOT's annual evaluation process.

2.1.10 Decisions Deferred to Tier 2 Studies

Several decisions will be made during Tier 2 studies and are not being made as part of this Tier 1 Record of Decision. These are described in the following subsections.

2.1.10.1 Facility Type

Agency comments requested that the project consider combinations of facility types (Super-2 or expressway) in different portions of each alternative. Final decisions about facility type(s) will be made for the selected alternative in Tier 2 studies. This can provide additional opportunities to avoid and minimize impacts while providing a range of design options. See FEIS, Vol. I, **Section 2.4 – Finalizing Alternative Carried Forward for Detailed Study** for further details.



2.1.10.2 Alignment

A working alignment was developed in Tier 1 studies for each alternative and facility type. These working alignments were developed for comparing the costs and impacts of alternatives. Final alignments for the selected alternative will be determined during Tier 2 studies in each SIU.

2.1.10.3 Access Plan

Tier 2 studies will provide an access plan for the selected alternative. This plan will include access points and configurations, including interchanges and grade separations.

2.1.10.4 Single Variation at Loogootee

Comments on the DEIS objected to the Alternative P corridor shown in SIU 4 in the vicinity of Loogootee. Some comments which objected to the corridor shown in the DEIS suggested that Alternative P continue through Loogootee as an upgrade of existing US 231. Other input suggested corridors to the east of Loogootee. For these reasons, the selection of a single alignment in SIU 4 will be made during Tier 2 studies. Refer to FEIS Vol. I, **Section 2.5.2 – Route Variations at Loogootee** for more information.

2.1.10.5 Location of Local Improvements

The Local Improvements discussed in **Section 2.1.9** were evaluated on a conceptual level in the FEIS. The locations depicted in FEIS, Vol III, *Environmental Atlas* are conceptual. Their exact location will be identified in Tier 2 studies.

2.2 Tier 2 NEPA Studies

Sections 2.2.1 through **Section 2.2.5** address the Tier 2 NEPA studies which will be provided in SIU 2 through SIU 5 of RPA P. No Tier 2 NEPA study is anticipated for SIU 1, because no Mid-States Corridor-related construction is anticipated in this section. SIU 1 extends between US 231/SR 66 and US 231/I-64.

Section 2.2.6 addressed the Tier 2 NEPA studies which will be provided for the local improvements.

2.2.1 Type of NEPA Documents

Either an Environmental Impact Statement or an Environmental Assessment will be prepared for each Tier 2 NEPA document for SIU 2 through SIU 5 of RPA P.

2.2.2 Termini for Tier 2 Sections

The project considered in a Tier 2 study is referred to as a “Tier 2 Section.” The termini for the Tier 2 sections shall be the termini described in the FEIS, Vol. I, **Section 5.3.1 – Description of Tier 2 Sections**. These termini are approved in this Record of Decision for the reasons stated in the FEIS, Vol. I, **Section 5.3.2 – Rationale for Tier 2 Section Termini**.

2.2.3 Scope of Environmental Analyses

Each Tier 2 NEPA document will include more detailed studies to further define natural environment and human environment resources, including field studies to verify these resources. In addition, more focused EJ outreach, and public involvement/outreach will occur in the Tier 2 studies to further define community concerns and issues. Each Tier 2 NEPA document will “look beyond” the termini of the Tier 2 section for which that document is being prepared to determine whether there are any sensitive environmental resources just beyond the termini that would affect the location of the adjoining section(s). This approach is intended to provide additional assurance that decisions made in one section do not prematurely preclude consideration of alternatives for adjoining sections.



2.2.4 Range of Alternatives

The range of alternatives considered in detail in the Tier 2 NEPA documents will differ from the range of alternatives in a typical NEPA document. It is expected that the alternatives screening process in Tier 2 will result in the identification of a single alignment together with multiple route variations or design options in specific areas within the selected corridor. Key Tier 2 issues for each section will include access location and design, access to abutting properties and location of grade separations with intersecting roads. The range of alternatives appropriate for each Tier 2 document will be determined for each Tier 2 section in consultation with resource agencies, stakeholders and the public. The Tier 2 NEPA studies will include consideration of a No-Build Alternative as a baseline for analysis comparison, in accordance with applicable regulations.

2.2.5 Potential for Alternative Features to be Outside of Corridor

In general, the range of alternatives considered in a Tier 2 study will be confined to the selected corridor. However, the flexibility will exist to consider alternatives with minor shifts outside the selected corridor to avoid impacts not anticipated in the Tier 1 EIS or to address context sensitive design issues in a way that does not materially increase overall impacts. The issue of whether to consider alternatives outside the selected corridor will be determined in consultation with resource agencies and the public during Tier 2 studies. Any alternatives outside the selected corridor will connect all of the points listed in Section 2.1.2 above (Rockport, Huntingburg, Jasper, Haysville, Loogootee and NSA Crane), as well as connect the project termini (US 231/SR 66 at Natcher Bridge and US 231/I-69 interchange at Crane NSA). In addition, associated access treatments or local road modifications may occur outside of the corridor.

2.2.5.1 Access Treatments

Access connections may extend beyond the boundaries of the corridor. Such connections include at-grade access connections (frontage roads and/or other access roads connecting to existing roadways), grade separations (overpasses or underpasses) and interchanges.

2.2.5.2 Local Road Modifications

Some modifications to the existing local road network may be required due to access changes required for the project and may extend beyond the boundaries of the corridor. Such modifications would be made to provide access to the project, or to continue to serve local traffic patterns.

2.2.6 Local Improvements

As described in FEIS, Vol. I **Section 2.4.2.2 – Consideration of Localized Improvements**, the depiction of Local Improvements in this Tier 1 FEIS and Record of Decision are conceptual. Their exact location and configuration will be determined in Tier 2 NEPA studies. These Tier 2 studies of Local Improvements may be either Environmental Assessments or Categorical Exclusions.

3. BASIS OF DECISION

Based on a balanced consideration of the needs for increased regional accessibility, the social, economic and environmental effects of the project alternatives and public and agency input, the FHWA and Indiana Department of Transportation have identified Refined Preferred Alternative P (RPA P) as the selected alternative for the following reasons:

- It addresses the need for improved system linkage in Southern Indiana in an environmentally responsible manner.



- It allows flexibility for Tier 2 studies to determine the facility type in Tier 2 studies to accommodate future available revenues.
- It allows for the level of analysis required to determine a single alignment in SIU 4.

The remainder of this section of the ROD further summarizes the key steps that led to the identification of the Selected Alternative, RPA P. This decision was made by balancing performance, cost, environmental impacts and public and agency opinion.

3.1 NEPA Process

The Tier 1 FEIS for the Mid-States Corridor project was prepared by the FHWA and INDOT in accordance with the following:

- *National Environmental Policy Act (NEPA) of 1969*
- FHWA Technical Advisory T 6640.8A, *Guidance for Preparing and Processing Environmental and Section 4(f) Documents (FHWA 1987)*
- *Procedural Manual for Preparing Environmental Documents (INDOT 2008)*
- 23 U.S.C 139

The FEIS documents key milestone dates throughout the NEPA process. Of note, the FHWA issued a Notice of Intent (NOI) in the Federal Register on July 5, 2019 for the preparation of a Tier 1 EIS for the Mid-States Corridor Project. This Tier 1 EIS would identify a single corridor for Tier 2 studies. In addition, the NOI provided background information on the project and identified that the proposed action is intended to provide improved system linkages and provide more direct connections between the Southern Indiana population, manufacturing and multi-modal centers.

Following the NOI, early agency coordination was conducted via letters and agency meetings at the Scoping and Screening of Alternatives milestones. The FHWA and INDOT conferred with one Cooperating Agency, the U.S. Fish and Wildlife Service, which has jurisdiction by law or special expertise with respect to potential environmental impacts of the project. There were numerous other Participating Agencies. These included federal, state and local agencies and six Native American tribes. FEIS Vol. I, **Section 7.4 – Agency Review and Coordination** provides details of this process.

FHWA and INDOT provided information to the public early and continued to solicit public feedback throughout the NEPA process. See FEIS Vol. I, **Section 7.3 – Public and Community Outreach** for details of this process. This process included multiple Regional Issues Involvement Teams, multiple meetings with project stakeholders, a project office, project website and social media.

The Notice of Availability (NOA) of the DEIS for public review was published in the Federal Register on April 15, 2022, including publication of the close of the comment period on May 31, 2022. In response to comments, the closing of the comment period was extended to June 14, 2022. The NOA of the combined FEIS/ROD will be published in the Federal Register, announcing the decision and the end of the NEPA process.

3.2 Purpose and Need

The purpose of this proposed action is identified in the FEIS, Vol. I, **Section 1.1 – Statement of Purpose and Need** and **Section 1.6 – Project Goals and Performance Measures**. The statement of purpose and



need is multi-dimensional and reflects the full range of goals that are intended to be served by this large-scale project. It was developed through an open, collaborative process and took into account federal legislation, statewide plans and policies and a comprehensive needs assessment. For a discussion of the factors considered in developing the purpose and need, refer to the FEIS, Vol. I, **Section 1.2 – Policy Framework, Section 1.3 – Previous Studies, Section 1.4 – Needs Assessment and Section 1.5 – Public and Agency Input.**

The Purpose and Need identified seven goals for Southern Indiana, which were grouped into four broad categories. These included Business and Personal Regional Connectivity, Safety, Economic Development and Multi-Modal Connectivity. Of the seven specific goals, three were identified as core goals – i.e., the primary objectives of the project. The core goals were determined based on consideration of multiple factors, including federal legislation, INDOT plans and policies, a comprehensive needs assessment and public input. To be selected, an alternative had to achieve an adequate improvement over the existing condition with respect to each of the core goals. This assessment of adequate improvement is provided in FEIS Vol. I, **Section 5.1 – Summary of Alternatives.** Other goals describe “other desirable outcomes,” and were not considered in identifying the selected alternative.

The seven project goals are listed below. Goals 1, 2 and 7 are designated as core goals.

Improve Business and Personal Regional Connectivity in Dubois County and Southern Indiana

- **Goal 1** - Increase accessibility to major business markets (core goal)
- **Goal 2** - Provide more efficient truck/freight travel in Southern Indiana (core goal)
- **Goal 3** - Reduction in localized congestion in Dubois County

Reduce Crashes at Key Locations in Southern Indiana

- **Goal 4** - Reduce crashes at key locations in Southern Indiana

Support Economic Development in Southern Indiana

- **Goal 5** - Increase levels of business activity within Southern Indiana
- **Goal 6** – Increase personal economic well-being in Southern Indiana

Improve Highway Connections to Existing Major Multi-Modal Locations in Southern Indiana

- **Goal 7** - Increase access to major intermodal centers from Southern Indiana (core goal)

3.3 Alternatives

3.3.1 Key Concepts in Alternatives Analysis

To provide a set of tools for analyzing the environmental impacts of the alternatives carried forward for detailed study, each alternative was defined as a set of three overlapping bands: a “Study Band,” a “Corridor” and a “Working Alignment.” Conceptual Local Improvements also were identified. A broad range of non-highway alternatives also was evaluated.

3.3.1.1 Study Band, Corridor and Working Alignment

A two-mile study band was generated for evaluating resources and consideration of where a reasonable working alignment could be placed. For the Screening of Alternatives, a center line for a potential roadway alignment was created, and depending on the terrain, land use and facility type, buffers of set



distances were placed along the alignment to estimate impacts to resources. For alternatives carried forward, the working alignment was further refined and provided more accurate construction footprints to estimate impacts. A selected Build Alternative would have a 2,000-foot corridor placed around the alignment as the corridor for Tier 2 studies. Details are provided in FEIS Vol. I – **Section 3.1.1, Working Alignments Selected for Detailed Study.**

3.3.1.2 Local Improvements

Agency comments requested consideration of upgrades to existing highways as part of this project. This consideration showed that including existing highways within an alternative corridor would not offer cost advantages, would be more impactful to existing residences and businesses and negatively affect existing access. This analysis did identify some improvements to existing highways which would address some secondary goals. Local improvements were identified for each alternative. Their costs, benefits and impacts were reported as part of their associated corridor alternative.

3.3.1.3 Consideration of Non-Highway Alternatives

An in-depth review of non-highway alternatives was provided as part of **Appendix D – Screening of Alternatives.** This analysis considered 15 non-transportation alternatives and three transportation alternatives. This evaluation concluded that all non-highway alternatives failed to address at least one core goal of the Purpose and Need. This removed these alternatives from further consideration.

3.3.2 Alternatives Considered in Detail

Alternatives were developed and analyzed through a three-level process during Tier 1, as explained in the FEIS, Vol. I, **Section 2.1 – Process Overview.** As a result of this process, five "build" alternatives were carried forward for detailed study in the DEIS. These included Alternatives B, C, P, M and O. In response to DEIS comments, two additional alternatives were evaluated in the FEIS. These include Refined Preferred Alternative P (RPA P) and Alternative R. These alternatives are shown in Figure 3.

These seven alternatives, along with the No-Build Alternative, were analyzed for social, economic, and environmental effects as well as performance and cost measures. For the performance and cost analysis of these alternatives, see FEIS, Vol. I, **Section 2.6 – Detailed Performance and Cost Analysis of Alternatives.** For a detailed analysis of the environmental impacts of these alternatives, see FEIS, Vol. I, **Chapter 3 – Environmental Resources, Impacts and Mitigation.** For a comparison of these alternatives, including the advantages and disadvantages of each, see Table 1 below and FEIS, Vol. I, **Section 5.1 – Summary of Alternatives.** The color-coding in Table 1 is cited in **Section 3.3.7 - Environmentally Preferable Alternative.**

Freeways were removed as a facility type in the early stages of the study. See **Section 2.1.4.** As a result, portions of alternatives south of I-64 would use existing US 231, which is a four-lane divided expressway. Any changes south of I-64 would be confined to signage and related improvements. The following discussion of alternatives is confined to the portion of the project north of I-64.

3.3.2.1 No-Build Alternative

The No-Build Alternative consisted of the "existing" highway network, plus projects which are considered "committed." "Committed" projects are those which are regarded as reasonably certain to be built or for which INDOT has a firm, long-term commitment to build. The No-Build Alternative is described in the FEIS, Vol. I, **Section 2.3.1 – Screening Approach.**

The No-Build Alternative would cause the least damage to the biological and physical environment. However, the No-Build Alternative does nothing to achieve any of the goals of the Mid-States Corridor



project. The No-Build Alternative requires only the construction cost for committed projects in fiscally-constrained state and local plans. It also will result in increased operation and maintenance costs for these projects after their construction. Over time, however, there are significant regional deficiencies in system linkage and regional accessibility which remain unaddressed under the No-Build Alternative.

Under the No-Build Alternative, the Mid-States Corridor project would not proceed. It is assumed that FHWA and INDOT would proceed with the committed projects. Each of these projects would receive individual environmental reviews.

This Record of Decision selects a Build Alternative. In accordance with applicable regulations, the Tier 2 NEPA Studies will include consideration of a No-Build Alternative as a baseline for analysis comparison.

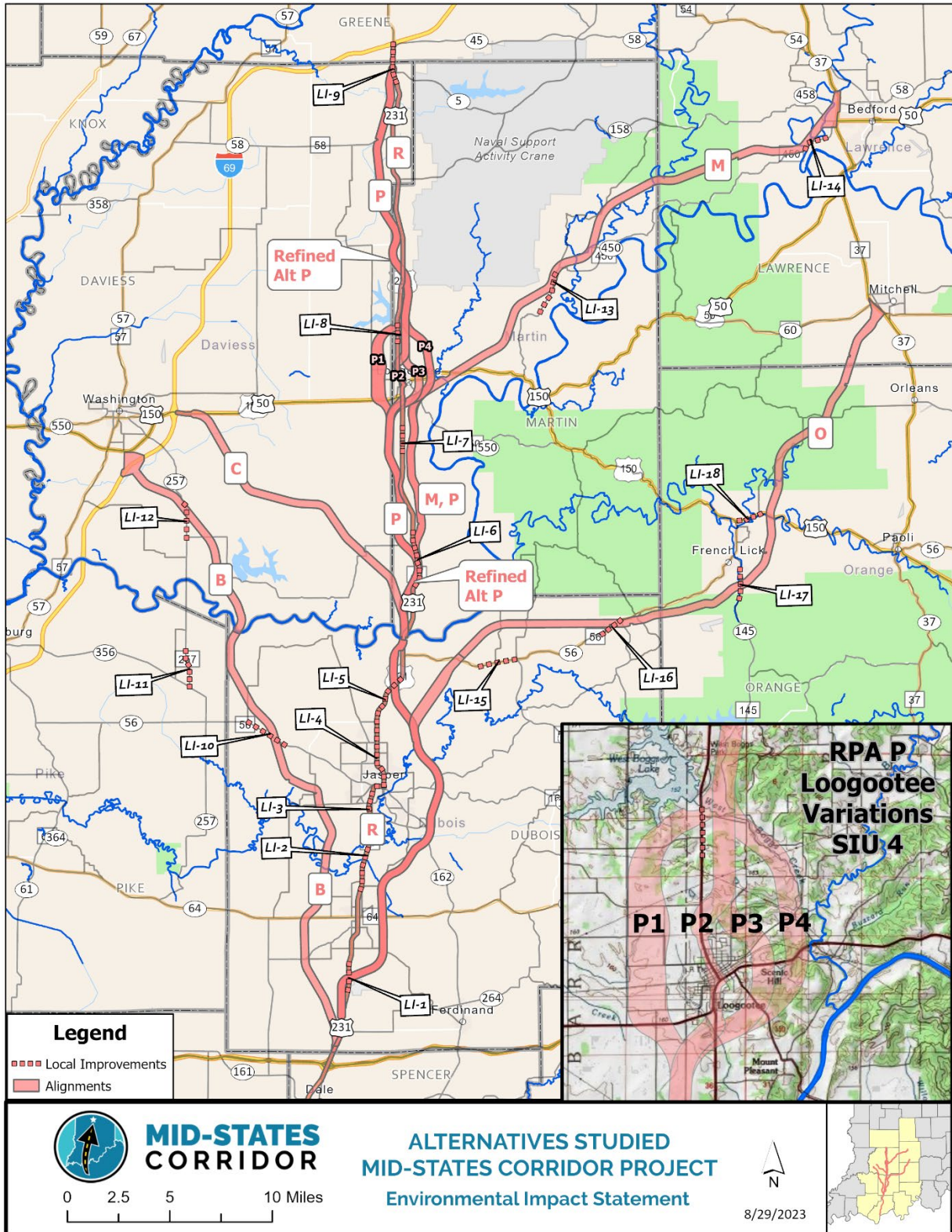


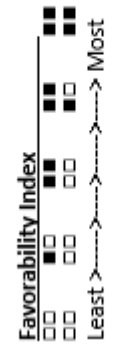
Figure 3: Alternatives Studied in FEIS



	Alternative B	Alternative C	Alternative M	Alternative O	Alternative P	RPA P	Alternative R
BENEFITS	Sum of time saved from all locations to key destinations/ Minutes (Core Goal 1)	8-10 □□	16-17 □□	30-35 □□	19-23 □□	25-43 □□	5 □□
	Increase in Labor Force Access to all destinations/ # Persons (Core Goal 1)	15,300-17,600 □□	4,500-5,000 □□	10,200-11,000 □□	26,300-26,900 □□	10,400-11,200 □□	100 □□
	Sum of time saved from Crane & Jasper to major rail & air multi-modal centers/ Minutes (Core Goal 7)	4-8 □□	3-4 □□	17-22 □□	10-13 □□	24-35 □□	4 □□
COSTS	Annual Truck Hours Saved/ Vehicle Hours Travel (Core Goal 2)	(-11,400)-150 □□	1,800-34,150 □□	7,800-35,900 □□	(-3,000)-18,250 □□	8,400-36,850 □□	(-250) □□
	Total Miles (SR66 / US231 to I69) / Miles	33 □□	41 □□	62 □□	53 □□	54 □□	49 □□
	Total Construction Cost + Contingency / \$ Millions	449-576 □□	544-759 □□	1,105-1,395 □□	1,074-1,320 □□	735-1,052 □□	730-1,061 □□
	Potential Relocations (agricultural, business, institutions or residential) / #	90-96 □□	92-116 □□	187-214 □□	141-189 □□	109-149 □□	114-156 □□
	Cultural – Above Ground Historic Sites (NRHP Listed or Potentially Eligible) / #	0 □□	7 □□	4 □□	16 □□	6 □□	5-6 □□
	Agricultural – General / acres	1,517-1,763 □□	1,082-1,408 □□	1,465-1,857 □□	1,091-1,381 □□	1,354-1,832 □□	1,272-1,832 □□
	Protected Species – Indiana Bat Forests within <i>maternity</i> area/ acres	206-223 □□	62-86 □□	1,418-1,603 □□	380-431 □□	228-282 □□	200-281 □□
	Protected Species – Indiana Bat Forests within <i>hibernacula</i> area/ acres	0 □□	0 □□	0 □□	493-516 □□	0 □□	0 □□
	Protected Species – Northern Long-Eared Forests within <i>maternity</i> area/ acres	130-135 □□	9-12 □□	841-954 □□	294-327 □□	161-188 □□	159-189 □□
	Protected Species – Northern Long-Eared Forests within <i>hibernacula</i> area/ acres	0 □□	0 □□	651-712 □□	1-2 □□	0 □□	0 □□
KEY IMPACTS	Forests – Total / acres	312-347 □□	424-556 □□	1,994-2,311 □□	1,588-1,756 □□	629-923 □□	607-874 □□
	Potential Karst Features (caves, springs and sinkholes) / #	0* □□	0 □□	87 □□	58 □□	0 □□	0 □□
	Streams & Rivers (intermittent and perennial only) / miles	7-8 □□	6-7 □□	12-14 □□	11-13 □□	8-11 □□	8-12 □□
	Floodplains / acres	394-441 □□	380-470 □□	957-1,092 □□	389-452 □□	419-607 □□	413-601 □□
Potential Wetlands / acres	76-84 □□	46-56 □□	98-111 □□	46-55 □□	39-56 □□	38-52 □□	

*Alternative B has one known sinkhole present along the corridor, but this sinkhole is not associated with karst topography.
 **Alternative R cultural impacts include historic districts with multiple individual structures directly impacted within each historic district.

LEGEND



Primary Reason for Not Selecting
 Secondary Reason for Not Selecting

Table 1: Alternatives Key Performance, Cost and Impacts



3.3.2.2 Alternative B

Alternative B extends for 33 miles from SR 66/US 231 to I-69 at Petersburg. The portion south of I-64 uses existing US 231 and requires no construction. It connects Rockport, Huntingburg, Jasper and Petersburg. It is the only alternative which has a corridor west of Huntingburg and Jasper.

3.3.2.3 Alternative C

Alternative C extends for 41 miles from SR 66/US 231 to I-69 at Washington. The portion south of I-64 uses existing US 231 and requires no construction. It connects Rockport, Huntingburg, Jasper, Haysville and Washington. Its corridor is east of Huntingburg and Jasper.

3.3.2.4 Alternative M

Alternative M extends for 62 miles from SR 66/US 231 to I-69 south of Bloomington. The portions south of I-64 and along SR 37 north of Bedford use existing US 231 and existing SR 37 respectively, requiring no construction. It connects Rockport, Huntingburg, Jasper, Haysville, Loogootee, Bedford and Bloomington. Its corridor is east of Jasper and Huntingburg.

3.3.2.5 Alternative O

Alternative O extends for 53 miles from SR 66/US 231 to I-69 south of Bloomington. The portions south of I-64 and along SR 37 north of Mitchell use existing US 231 and existing SR 37 respectively, requiring no construction. It connects Rockport, Huntingburg, Jasper, French Lick, Mitchell, Bedford and Bloomington. Its corridor is east of Jasper and Huntingburg.

3.3.2.6 Alternative P

Alternative P extends for 54 miles from SR 66/US 231 to I-69 at Crane. The portions south of I-64 use US 231, requiring no construction. It connects Rockport, Huntingburg, Jasper, Haysville, Loogootee and Crane. Its corridor is east of Jasper and Huntingburg.

3.3.3 Post-DEIS Alternatives Analysis

In response to comments received on the DEIS, FHWA and INDOT conducted additional analysis of the alternatives and engaged in additional consultation with federal and state regulatory agencies. These additional activities were described in the FEIS, Vol. I, **Section 2.5.1 – Reconsideration of Alternative R** and **Section 2.5.2 – Route Variations at Loogootee**.

3.3.3.1 Reassessment of Alternative R

Many comments were received on the DEIS which advocated upgrading existing US 231 between I-64 and I-69. This alternative had been considered as a preliminary alternative but was not carried forward in the Screening of Alternatives. Based on this level of public interest, Alternative R was reassessed and analyzed in this FEIS at the same level of detail as other alternatives. Refer to FEIS **Section 2.5.1 – Reconsideration of Alternative R** for details.

3.3.3.2 Reconsiderations of Alternative P at Loogootee

Comments on the DEIS stated that Alternative P, especially its western bypass of Loogootee, would have negative impacts on the Loogootee area. Several comments were provided by public officials. Based on this level of public interest and the specificity of the input received, Alternative P was modified to produce Refined Preferred Alternative P (RPA P), which includes four route variations in the Loogootee area designated individually as RPA P1, RPA P2, RPA P3 and RPA P4. The modifications to produce RPA P are focused in SIU 4 (see Figure 1) near Loogootee. RPA P retains the western bypass of Loogootee



shown in the DEIS (RPA P1), which was shown as Alternative P and identified as the Preferred Alternative. It adds two modified eastern bypass variations (RPA P3 and RPA P4) as well as a variation through Loogootee using the route of existing US 231 (RPA P2). The “through Loogootee” variation will not consider an expressway facility.

A single variation at Loogootee will be selected during Tier 2 studies in SIU 4. The need to consider detailed environmental, economic, engineering, and other benefits and impacts in SIU 4 was an important factor in deferring the decision about a single variation to Tier 2 studies. Selection of a single variation in SIU 4 will be made during Tier 2 studies.

3.3.3.3 Identification of Refined Preferred Alternative P (RPA P)

The costs, benefits and impacts of Refined Preferred Alternative P were fully analyzed in this FEIS. These were compared to the costs, benefits, and impacts of other alternatives including Alternative R.

3.3.4 Public Outreach and Opportunities to Comment

Public engagement is an integral part of the NEPA process. In-person meetings where the public can speak directly with project representatives are a pillar of the NEPA process. Due to the scale of this project with a 12-county Study Area, in-person opportunities were provided over a wide geographic area. These were needed to provide adequate opportunities for the public to learn about and comment on the project. There was additional flexibility to meet with groups at their request. Announcements were provided prior to all meetings through newspapers, television news stations, email notifications, text alerts, social media and the project website.

The following sections describe both the in-person and virtual opportunities for public outreach and input. The virtual opportunities were especially valuable during much of the project, when the COVID pandemic restricted in-person interaction. Refer to FEIS, Vol. I, **Section 7.3 – Public and Community Outreach** for details.

3.3.4.1 In-Person Opportunities

Many in-person opportunities were provided consistent with public health advisories. These included:

- **Stakeholder Meetings and Economic Development Interviews.** Eighteen (18) interviews were held with economic development leaders. In addition, 17 ad hoc meetings were held with targeted stakeholders.
- **Regional Issues Involvement Team Meetings.** There were eight meetings with key community, government and business leaders. They were held at various locations in the project area at key Study milestones.
- **Formal Public Meetings.** Six public information meetings were held at key project milestones. In addition, two formal public hearings were held after the release of the DEIS.
- **Project Office Visits.** A project office was maintained on the Vincennes University Campus in Jasper. The project office had 119 visitors between July 15, 2019, and April 1, 2023. Three surges of visitors coincided with the two rounds of public informational meetings and the release of the Draft Environmental Impact Statement.

3.3.4.2 Virtual and Written Opportunities

Many additional opportunities for input were provided. Multiple channels for direct written communication were provided. Multiple electronic platforms were provided for digital communication.



- **Project Website.** The project website, <https://midstatescorridor.com/>, was launched July 2019. It was updated with project information and announcements at appropriate intervals. This included a project overview, meeting summaries and materials, project documents and maps, news and events, photos, videos and a portal to direct comments to project staff.
- **Social Media.** Facebook ([Facebook.com/MidStatesCorridor](https://www.facebook.com/MidStatesCorridor)) and Twitter ([Twitter.com/MidStatesStudy](https://twitter.com/MidStatesStudy)) accounts were created for the Mid-States Corridor project. They were regularly updated with project information.
- **Project Office Contacts.** Phone inquiries, emails and letters were directed to the project office. Between July 15, 2019, and April 1, 2023, there were 219 phone inquiries, 549 emails and 328 letters/returned comment forms received at the project office.
- **Traditional Media.** Traditional media such as newspapers and local television news were monitored for articles, stories, opinion pieces and letters to the editor referencing the Mid-States Corridor Project. Approximately 452 media mentions were captured between July 2019 and March 2023.
- **Meetings in a Box.** During the DEIS comment period, 17 area libraries hosted “Meetings in a Box.” These were displays which included all hearing presentation packets and comment forms which were left at each library. Individuals could leave comments on the DEIS at these locations. This outreach technique also was used at other points in the study.

3.3.4.3 Loogootee/RPA P Outreach

Additional outreach followed the decision to reconsider the route of Alternative P at Loogootee (**Section 3.3.3.2**). Five meetings were held with local representatives between May 11 and December 27, 2022. Two meetings were held with the local Amish community on November 9 and 22, 2022. An announcement was made on March 1, 2023 to inform the public of the Refined Preferred Alternative P based on comments received on the DEIS. A video posted on the project website to explain that a single alignment at Loogootee would be determined during Tier 2 studies. There also was a press release, updated maps and a flyer. All of these items were made available at eight local libraries. A meeting was held on March 22, 2023 with members of the Martin County Amish community.

3.3.5 Identification of the Selected Alternative

INDOT identified Alternative P as the preferred alternative in the DEIS. RPA P was identified to address comments regarding the potential for significant impacts at Loogootee. Its cost, performance and impacts were compared to other alternatives. Based on this comparison, RPA P was identified as the selected alternative in this Record of Decision. **Section 3.3.7** explains the identification of the Environmentally Preferable Alternative.

3.3.6 Section 4(f) Resources

Section 4(f) of the USDOT Act of 1966 (49 U.S.C. § 303; 23 C.F.R. § 774) establishes that a federally funded or approved transportation project may not “use” land from a publicly owned park, recreation area, wildlife or waterfowl refuge; a public or private historic site either listed on, or eligible for listing on, the NRHP; or archaeological sites that are either listed on, or eligible for listing on, the NRHP and warrant preservation in place, unless there is no feasible or prudent alternative to the use. Section 4(f) use occurs if there is permanent incorporation, temporary occupancy, or constructive use of a protected property. Any such use can only be approved if the agency determines that the proposed action includes all possible planning to minimize harm to protected properties.



For parks and refuges, a *de minimis* impact is one that will not adversely affect the activities, features, or attributes of the Section 4(f) property. For historic properties, a *de minimis* impact is one for which either no historic property is affected by the project or the project is determined to have "no adverse effect" on the historic property, as part of the separate Section 106 process.

The proposed action has the potential to require the use of resources protected under Section 4(f) of the Department of Transportation Act, 49 U.S.C. 303(c). A Section 4(f) evaluation appropriate for a Tier 1 study has been included in the FEIS, Vol. I, **Chapter 4 – Section 4(f) Impacts**. This Record of Decision includes a preliminary Section 4(f) determination for the project as recommended in FHWA regulations for tiered studies, 23 CFR 771.111(g).

In accordance with these regulations, the Section 4(f) evaluation in the FEIS was intended to: (1) evaluate the potential impacts of the alternatives on Section 4(f) resources as those impacts relate to the decision to be made at Tier 1 and; (2) ensure that opportunities to minimize harm to Section 4(f) resources in Tier 2 are not precluded by decisions made at Tier 1.

3.3.6.1 Parks, Recreational Areas, Refuges

Multiple public parks, recreation areas and wildlife or waterfowl refuge resources have been identified in the vicinity RPA P. Three present or proposed future resources are potentially impacted by the selected alternative. These are listed in the three subsections below. FEIS Vol. I, **Section 4.2 – Section 4(f) Resources – Parks, Recreation Areas and Wildlife or Waterfowl Refuges** fully documents these Section 4(f) resources.

3.3.6.1.1 West Boggs Park

The working alignment of RPA P would impact less than one acre of the Daviess-Martin County Park (West Boggs Park), including associated trails. INDOT will engage in joint development coordination with the Daviess-Martin County Park Board. This will ensure that planning for the roadway avoids the park if possible or minimizes any impact to the park if avoidance is not prudent. It will also ensure that roadway planning takes into account any of the Board's planned future development of the park. It is anticipated that any potential use of this resource would not exceed a *de minimis* level.

3.3.6.1.2 Jasper Trail System

The Jasper Trail System is managed by the Jasper Parks and Recreation Department and can be found in the Jasper Transportation Plan. A planned segment of the Jasper Multi-Use Pathway follows US 231 from 15th Street to Schuetter Road. Several planned segments cross US 231 within the limits of Local Improvements 3 and 4. Portions of the property slated for these planned trail segments are already owned by the City of Jasper; however, areas within US 231 right-of-way have not yet been acquired. Coordination with the Jasper Parks and Recreation Department will be conducted to further evaluate proposed trail status and determine needed accommodations relative to potential future Section 4(f) use. During Tier 2 studies, INDOT will engage in joint development activities with the City of Jasper for development of its trail system and planning and construction of these local improvements. It is anticipated that any potential use of this resource would not exceed a *de minimis* level.

3.3.6.1.3 Dubois County Trail System

The Dubois County Bike and Pedestrian Master Plan provides for a network of bicycle and pedestrian trails throughout Dubois County. Portions of this plan provide for designation of existing roads as bicycle facilities with no physical alterations other than the addition of signage. This analysis considers only proposed trails for which new construction or physical modifications to existing facilities is planned. Approximately 1,300 and 1,600 feet of three proposed trails would be within the working alignment of



RPA P. These include the Huntingburg to Ferdinand Trail, SR 162 Shared Use Path and the Dubois County Railroad Trail (Jasper to French Lick). Coordination with the Dubois County Commissioners will be conducted to further evaluate proposed trail status and determine needed accommodations relative to potential future Section 4(f) use. During Tier 2 studies, INDOT will engage in joint development activities with the Dubois County for development of its trail system and planning and construction of these local improvements. It is anticipated that any potential use of these resources would not exceed a *de minimis* level.

3.3.6.1.4 County Line Trail - Loogootee

County Line Trail to West Boggs Park is a planned trail to connect Loogootee to West Boggs Park. The City of Loogootee currently owns some segments of the planned trail, which is not yet funded. If funding is obtained and the planned trail is built, between approximately 4,200 and 5,800 feet of the planned trail would be within the working alignment for RPA P. Approximately 4,100 feet of this distance is within the conceptual footprint of Local Improvement 8. INDOT will confer with the Loogootee Park Board to identify accommodations to avoid or minimize any potential future Section 4(f) use. It is anticipated that any potential use of this resource would not exceed a *de minimis* level.

3.3.6.1.5 Summary – Parks, Recreation Areas, Refuges

Based on existing information, it is highly likely that an alignment can be developed during Tier 2 within the corridor for RPA P to have no impacts or only *de minimis* impacts to Section 4(f) protected parks, recreation areas and wildlife or waterfowl refuges. INDOT will engage in joint development activities with the officials with jurisdiction for all resources.

3.3.6.2 Historic and Archaeological Resources

Multiple historic properties and archaeological sites have been identified in the vicinity of RPA P. Since eligibility determinations will be made during Tier 2 studies, this Tier 1 analysis is an approximate evaluation, appropriate for Tier 1 comparisons of alternatives. FEIS Vol. I, **Section 4.3 – Section 4(f) Resources – Historic and Archaeological Resources** fully documents potential Section 4(f) resources.

3.3.6.2.1 Above-Ground Resources

In this Tier 1 EIS, above-ground cultural resource impacts were identified as those within a 2,000-foot proximity of the working alignment for new alignment alternatives, as well as those within the working alignment of Local Improvements. During Tier 2 studies, alternative footprints will be determined and compared to the boundaries of properties listed in the National Register of Historic Places (NHRP) as well as eligible properties. Tier 1 studies focused on the identification of potentially eligible cultural resources but did not make final eligibility determinations nor effects determinations for these properties. During Tier 1 studies, potentially-eligible resources were identified during limited field surveys by qualified professional historians. The Tier 1 studies undertook a preliminary review of potential impacts to above-ground cultural resources. The term “impact” refers only to the proximity of a cultural resource to an alternative and does not indicate a level of effect. Effects determinations for cultural resources will be made during Tier 2 studies. Refer to FEIS, Vol. I, **Section 3.13.2.2**, which describes the Tier 1 process for identifying above-ground resources. An impact, for the purposes of this preliminary review, occurs when a cultural resource is either within, or less than 2,000 feet from, a working alignment for a new facility, or within a working alignment for a Local Improvement.

The following list enumerates above-ground resources which are proximate to RPA P. Details about each resource are provided in FEIS, Vol. II, **Appendix O – Historic Properties Analysis**. This list provides the distance between the working alignment for RPA P and the resource’s nearest structure, as well as the Photo ID number for each resource in **Appendix O**. Unless otherwise indicated, these resources were



determined as potentially eligible during windshield surveys described in FEIS, Vol. 1, **Section 3.13 – Cultural Resources Impacts**.

- Brinegar Chapel, Daviess County, Photo ID 1389, 1,390 feet
- Shady Nook Motel, Martin County, Photo ID 1340, 365 feet (Variation P4 in SIU 4, only)
- Unnamed Log House, Dubois County. Photo ID 372, 433 feet
- Frank Cunningham House, Daviess County, Photo ID 1259, 488 feet
- Chandler Peilemeyer House, Daviess County, Photo ID 1260, 564 feet
- Craney Farmstead, Martin County, Photo ID 1156, 618 feet
- St. Paul’s Evangelical Lutheran Church, Dubois County, Photo ID 473, 842 feet
- Martin County Bridge Number 58, Martin County, Photo ID 1283, 1,350 feet (Variation P4 in SIU 4, only)
- Lewis C Brooks House, Martin County Photo ID 1252, 1,336 feet (Variation P3 in SIU 4, only) **NRHP listed.**

There are two resources in SIU 4 which are within the footprint of the working alignment for Variation P2, only. One is the Loogootee Commercial Historic District in Martin County. It is depicted in photos 2147 to 2161 in **Appendix O**. The other is the Loogootee Gymnasium in Martin County. It is depicted in Photo 2164 in **Appendix O**.

Based on existing information, it is highly likely that an alignment can be developed during Tier 2 within the corridor for RPA P that avoids any listed or eligible above-ground cultural resources. This avoidance may include use of one of the variations in SIU 4 to avoid impacts which would occur in another variation.

3.3.6.2.2 Archaeological Resources

FEIS, Vol. II, **Appendix N – Archaeology Analysis Addendum** reviewed published information about identified archaeological sites potentially associated with RPA P. This review identified one eligible and five potentially eligible sites within a 2,000-foot corridor centered on the RPA P working alignment. These sites will undergo further investigation during Tier 2 studies as provided in the Tier 1 Section 106 Programmatic Agreement. See FEIS, Vol. II, **Appendix P – Section 106 Documentation**.

3.3.6.3 Cultural Resources Summary

This process was carried out in accordance with the Section 106 regulations, which specifically allow for the phasing of efforts to identify and evaluate historic and archaeological sites “where alternatives under consideration involve corridors or large land areas.” In this phased process, eligibility evaluations during Tier 1 involved determinations of “potential eligibility.” Final determinations of eligibility and effects to historic and archeological properties will be made in Tier 2 studies.

3.3.6.4 Conclusions of Tier 1 Section 4(f) Evaluation

All of the corridors considered as alternatives in the FEIS have the potential to result in the use of Section 4(f) resources. All alternatives were developed with the intent to avoid Section 4(f) resources, where possible, and minimize impacts. The selection of RPA P is consistent with Section 4(f). Further actions to fulfill the requirements of Section 4(f) compliance will be required in Tier 2, as additional design details become available. For further details regarding Section 4(f) compliance in Tier 2, refer to **Section 3.3.6.5** of this Record of Decision.



3.3.6.5 Section 4(f) Compliance in Tier 2

During Tier 1, the FHWA and INDOT have conducted an extensive survey of Section 4(f)-protected parks, recreation areas, refuges and historic and archaeological sites. At this tier, the analysis has focused primarily on the potential impacts of the alternatives on Section 4(f)-protected lands. This approach is consistent with the FHWA tiering regulations. See 23 CFR 771.111(g).

During Tier 2, the FHWA and INDOT will continue to follow the procedures established in FHWA regulations for Section 4(f) compliance in a tiered process. For each Tier 2 study, FHWA and INDOT will conduct more in-depth studies of the actual impacts of RPA P on Section 4(f)-protected resources.

If the Tier 2 studies determine that an alignment within RPA P would use a Section 4(f)-protected property, FHWA and INDOT will develop and consider avoidance alternatives, as appropriate. The analysis of avoidance alternatives will initially consider alignment shifts within the selected corridor. If avoidance alternatives within the selected corridor are not available, the analysis of potential avoidance alternatives will be expanded as appropriate, in accordance with **Section 2.2.5** of this Record of Decision.

In summary, extensive efforts have been made during Tier 1 to avoid the use of all Section 4(f)-protected resources. Nonetheless, the possibility still exists that uses of Section 4(f)-protected properties may be identified in Tier 2. If such uses are identified, these properties will be avoided or uses minimized as required by Section 4(f).

3.3.7 Environmentally Preferable Alternative

In cases where an EIS has been prepared, CEQ regulations implementing NEPA require that the ROD must specify the alternative or alternatives considered environmentally preferable (40 CFR 1505.2(a)(2)). This means the alternative(s) that cause the least damage to the physical environment while also best protecting, preserving, and enhancing historic, cultural and natural resources. FHWA has considered all Build Alternatives and the No-Build Alternative. See **Section 3.3.2** of this ROD. It has considered the physical environmental effects associated with each. Considering these factors, FHWA has identified the Selected Alternative, RPA P, as environmentally preferable for the reasons enumerated below.

The costs, impacts and benefits cited here are provided in Table 1 of this Record of Decision. The color-coding highlights key performance and impact categories considered in not selecting other alternatives.

After detailed analysis and review of the available alternatives, RPA P has been identified as the Preferred Alternative for the Mid-States Corridor for the following reasons:

- 1) It produces the best combination of benefits associated with the defined goals for the project.
 - a. Most time saved from all key destinations (Core Goal 1)
 - b. Third best increase in access to labor force (Core Goal 1)
 - c. Most time saved for annual truck hours (Core Goal 2)
 - d. Most time saved from major multi-modal centers in Crane and Jasper (Core Goal 7)
- 2) Although this alternative does not consistently produce the lowest impacts to environmental resources, it does produce the lowest impacts among Alternatives M, O and P. These three alternatives were considered to adequately address the project's Purpose and Need. While



Alternatives B, C and R have lower impacts and costs, they also fail to adequately address the project's Purpose and Need by providing very limited improvement on travel time savings, increased labor force access, increased multi-modal access and truck hour savings (see Table 1).

- a. Alternative M has higher impacts to forests, protected species, karst features, floodplains and wetlands.
 - b. Alternative O has higher impacts to protected species, karst features and forests.
 - c. Although both Alternative M and O perform adequately on the core goals of the Purpose and Need, they both have poorer performance than RPA P.
- 3) RPA P has favorable ratings for several key impacts.
- a. Wetlands – It has the potential to produce the second-lowest impacts.
 - b. Karst Features – No karst features are present along this corridor.
 - a. RPA P has the smallest wetland impacts and the smallest stream impacts among alternatives which have adequate performance on the Purpose and Need. On this basis, it is anticipated that the Selected Alternative will be found to be consistent with the requirement to choose the Least Environmentally Damaging Practicable Alternative (LEDPA). A final determination regarding whether the Selected Alternative represents the LEDPA will be made by the USACE during the final design and permitting process.

4. REGULATORY REQUIREMENTS

Coordination with all appropriate federal and state agencies has occurred throughout the Tier 1 process. The major regulatory requirements applicable to this proposed action include: (1) consultation regarding historic and archaeological resources under Section 106 of the National Historic Preservation Act; (2) permitting under Section 404 of the Clean Water Act; (3) consultation regarding threatened and endangered species under Section 7 of the Endangered Species Act and; (4) the use of resources protected under Section 4(f) of the Department of Transportation Act of 1966.

With this FEIS/ROD, the Tier 1 Section 106 process is completed with the finalization of the Programmatic Agreement which will govern Tier 2 cultural resource studies. These actions, together with an overview of anticipated Tier 2 activities, are summarized below.

4.1 Section 106 Process

FEIS, Vol. I, **Appendix P – Section 106 Documentation** includes an executed Programmatic Agreement (PA) which identifies the mitigation procedures and other actions that will be further examined during the Section 106 consultation in Tier 2. On August 31, 2022, the Advisory Council on Historic Preservation notified the FHWA that it would not participate in the Tier 1 Section 106 process. The FHWA also sent a letter to all consulting parties that included the executed PA and invited them to sign the PA as a concurring party. The Section 106 process for this Tier 1 EIS is now completed.

Additional Section 106 consultation will be conducted for each Tier 2 section concurrently with the environmental impact statement (EIS) for that section. Section 106 consultation during Tier 2 will be



carried out in accordance with the Section 106 regulations, as described in the Section 106 PA executed during Tier 1.

4.2 Air Quality Conformity Analyses

On February 16, 2018, the United States Court of Appeals for the District of Columbia Circuit in *South Coast Air Quality Mgmt. District v. EPA* (“*South Coast II*,” 882 F.3d 1138) held that transportation conformity determinations must be made in areas that were either nonattainment or maintenance for the 1997 ozone national ambient air quality standard (NAAQS) and attainment for the 2008 ozone NAAQS when the 1997 ozone NAAQS was revoked. These conformity determinations are required in these areas after February 16, 2019. Greene County was *maintenance* at the time of the 1997 ozone NAAQS revocation on April 6, 2015 and was also designated attainment for the 2008 ozone NAAQS on May 21, 2012. Therefore, per the *South Coast II* decision, a conformity determination was made for the 1997 ozone NAAQS on the Mid-States Corridor project in Greene County.

FHWA made a conformity analysis determination on August 14, 2023. The determination of conformity and supporting materials are provided in FEIS **Appendix SS – Air Quality Conformity Determination**.

4.3 Section 404/Section 10

For projects involving excavation and/or discharge of dredged or fill material into waters or jurisdictional wetlands of the United States, including placement of structures or activity that disturbs soil/sediments below the ordinary high-water elevation, excluding de minimis discharges, INDOT must obtain a Section 404 Permit from the United States Army Corps of Engineers (USACE) prior to any construction. It also must obtain a Section 10 Permit from the USACE for impacts to any navigable waterway prior to any construction.

Waters of the United States are not delineated at Tier 1. These will be determined during subsequent phases of development based on the current Waters of the United States rule to define these resources. All potential jurisdictional resources have been incorporated into the Tier 1 impact assessments.

During Tier 2 studies, FHWA and INDOT will continue to confer closely with the USACE and other applicable agencies regarding Section 404 permitting. These consultations will be conducted for each Tier 2 NEPA study. Permit applications for each Tier 2 section or Local Improvement will be filed when a sufficient level of design detail and environmental data is available. Section 404 permits for each Tier 2 section or Local Improvement will be obtained prior to construction for that section.

RPA P has the smallest wetland impacts and the smallest stream impacts among alternatives which have adequate performance on the Purpose and Need. On this basis, it is anticipated that the Selected Alternative is consistent with the requirement to choose the Least Environmentally Damaging Practicable Alternative (LEDPA). A final determination regarding whether the Selected Alternative represents the LEDPA will be made by the USACE during the final design and permitting process.

4.4 Section 7

On January 27, 2023, the FHWA and INDOT submitted a Biological Assessment (BA) to the U.S. Fish and Wildlife Service (USFWS) to initiate Formal Section 7 Consultation. The BA examined the impacts of RPA P on several species. FEIS, Vol. II, **Appendix PP** is a redacted version of the BA. Based upon the



information and analysis provided in the BA, the FHWA concluded that a “*may effect, likely to adversely affect*” determination is supported for the Indiana bat, northern long-eared bat, and fanshell and fat pocketbook mussels. The FHWA also concluded that a “*may effect, not likely to adversely affect*” determination is supported for the gray bat, sheepsnose mussel, rough pigtoe mussel and lake sturgeon.

The BA also included assessment of species for which listing is anticipated within the development time for the Mid-States Corridor Project for the purpose of Formal Conferencing with USFWS. This assessment and Formal Conferencing is regarding the tricolored bat, little brown bat, salamander mussel and monarch butterfly.

Subsequently, on June 29, 2023, the USFWS issued a Framework Programmatic Biological Opinion and Conference Opinion (BO/CO) stating that the Mid-States Corridor Project with selected alternative RPA P will not jeopardize the continued existence of the Indiana bat, northern long-eared bat, and fanshell and fat pocketbook mussels. USFWS also provided concurrence with the determination of “*may effect, not likely to adversely affect*” for the gray bat, sheepsnose mussel, rough pigtoe mussel and lake sturgeon. The BO is included in FEIS, Vol. II, **Appendix QQ**. The BO concludes the Section 7 consultation process for Tier 1 and specifies the procedures to be followed for Section 7 consultation in Tier 2.

The Conference Opinion (CO) addressed species for which listing is anticipated within the development time for the Mid-States Corridor Project. Based on analysis in the BA, the FHWA concluded that a “*may effect, likely to adversely affect*” determination is supported for the tricolored bat, little brown bat, salamander mussel and monarch butterfly. The USFWS issued CO stated that the Mid-States Corridor Project with selected alternative RPA P will not jeopardize the continued existence of the tricolored bat, little brown bat, salamander mussel and monarch butterfly. These CO determinations can be adopted as a Biological Opinion after species are formally listed.

During Tier 2, informal or formal Section 7 consultation will be conducted for each Tier 2 section, concurrently with the NEPA process for that section. The Tier 2 consultation will include a Tier 2 Biological Assessment including detailed analysis of potential species and habitat impacts based on specific field studies and actual final right of way for the preferred alternative determined during Tier 2.

For the Local Improvements, Section 7 Consultation will be evaluated for applicability under the Range-wide Programmatic Consultation for Indiana bats and northern long-eared bats. While many of these existing facility improvements are likely to fall under the Programmatic Consultation, additional informal consultation with USFWS will be conducted to ensure all requirements are met to address Section 7 requirements during Tier 2 studies.

4.5 Section 4(f)

For a discussion of Section 4(f), including actions completed in Tier 1 and actions to be completed during Tier 2, please refer to **Section 3.3.6** of this Record of Decision and the FEIS, Vol. I, **Chapter 4 – Section 4(f)**.

4.6 State of Indiana Regulatory Requirements

During Tier 1 studies, State of Indiana regulatory requirements were confined to activities of the State Historic Preservation Officer (SHPO) as part of the Tier 1 Section 106 process. This is discussed in **Section 4.1** of this ROD.

Additional State of Indiana regulatory requirements will be addressed during Tier 2 studies. These are described in the following subsections.



4.6.1 Section 401 Water Quality Certification

Section 401 Water Quality Certification (WQC) approval from the Indiana Department of Environmental Management (IDEM) is required prior to the approval of the USACE Section 404 permit. IDEM is responsible for the Section 401 WQC review and approval process. Section 401 WQC's will be applied for and obtained for each Section of Independent Utility (SIU) of the Mid-States project prior to any construction activities beginning.

4.6.2 Indiana Isolated Wetland Permit

Isolated wetlands are defined as wetlands that are considered not regulated by the USACE under the Clean Water Act. These are regulated by IDEM under the State Regulated Wetlands Law (IC 13-18-22). Each isolated wetland impact will be reviewed to classify the isolated wetland. Such impacts will be permitted accordingly under the Indiana Isolated Wetlands Law.

4.6.3 IDEM NPDES Construction Stormwater General Permit (CSGP)

The requirements of the IDEM NPDES CSGP (327 IAC 15-5) apply to all persons involved in construction activities that result in the disturbance of one or more acres of land. The Mid-States project will require CSGP permits for each construction segment along with any off-site borrow and waste areas that impact one or more acres of land. Each CSGP permit will require the development and approval of a Storm Water Pollution Prevention Plan (SWPPP).

4.6.4 IDNR Construction in a Floodway Permit

The Flood Control Act (IC 14-28-1) requires that any person proposing to construct a structure, place fill or excavate material at a site located within the floodway of any river or stream with a drainage area greater than one square mile, unless that activity is exempt, obtain the written approval of IDNR Division of Water prior to initiating the activity. This permit originally was enacted to safeguard against loss of lives and property caused by floods and to ensure that floodway channels are not inhabited and kept free and clear of interference. This permit has been expanded to protect Indiana's natural resources located in the floodway. Construction in a Floodway Permit(s) will be applied for and obtained for all streams that do not meet an exemption prior to construction.

5. MEASURES TO MINIMIZE HARM

Throughout the NEPA process, efforts have been made to avoid human and natural resources. In particular, avoidance and the opportunity to minimize impacts were used in the decision-making process to identify a preferred alternative.

Some mitigation proposals in Tier 1 are conceptual and should be viewed as the starting point for identifying the total mitigation for constructing the Mid-States Corridor between Dale and Crane NSA. During the Tier 2 NEPA studies, these mitigation measures and others will be developed from more detailed information and interactions with the public and resource agencies.

FHWA and INDOT are committing to mitigation identified in FEIS, Vol. I, **Chapter 6 – Environmental Commitments** based on current information. Commitments documented in this Tier 1 Study generally are concepts and strategies designed to mitigate both the short and long-term impacts of the project. Mitigation measures specified in Tier 1 will be reviewed and may be modified in Tier 2 in consultation



with environmental resource agencies, based on more detailed environmental impact data developed in the Tier 2 studies. Specific mitigation measures and other commitments will be included in Tier 2 NEPA documents.

Chapter 6 of the FEIS includes a discussion of the mitigation measures that FHWA and INDOT are committing to implement. INDOT and FHWA have contacted state and federal environmental agencies, organizations and the public to provide input on both creative and traditional approaches for replacement of environmental functions and values that may be lost as a result of this project.

Facility type decisions have been deferred to Tier 2. This is in response to agency comments requesting the project consider combinations of facility types. This results in variability about the type and magnitude of mitigation which eventually will be required. For this reason, a detailed Preferred Alternative and Mitigation Package (PAMP) has not been prepared for this Tier 1 NEPA Study.

5.1 Human Environment

There was a broad range of public and elected official input regarding measures to avoid, minimize and mitigate impacts to the human environment. It was in response to such comments that RPA P has multiple variations in SIU 4. A single variation will be selected in Tier 2 studies in SIU 4. Consideration of impacts to the human environment will be a significant factor in decisions made in Tier 2 studies, in particular in SIU 4.

5.1.1 Local Land Use Planning and Travel Patterns

RPA P may disrupt local access and traffic flow, alter community connectivity and affect long-range land use planning. Mitigation strategies to address these potential impacts during Tier 2 studies will include maintaining route connectivity and local traffic flows, providing grade separations where appropriate, minimizing right-of-way acquisition to the greatest extent feasible, engaging in consultations with local and regional agencies, and supporting local economic activity.

5.1.2 Traffic (Short Term)

Short-term impacts during construction periods are anticipated. These will be mitigated by the development of Maintenance of Traffic plans. These plans will address management of construction-related traffic and congestion impacts, construction related hazards and traffic flow in work zones.

5.1.3 Visual

Visual impacts will require site-specific mitigation measures and will be determined during the Tier 2 NEPA studies. Efficient lighting fixtures will be chosen to mitigate visual impacts. These strategies can lessen adverse effects on humans and wildlife due to the introduction of artificial light. The lighting fixtures for **RPA P** would primarily be in rural areas and confined to interchanges and other select access points where they are warranted to enhance safety. Landscaping may be considered to avoid or minimize impacts to nearby residences.

5.1.4 Cultural Resources

Tier 2 studies will assess the effects of the Preferred Alternative upon NRHP-listed and NRHP-eligible properties as well as seek ways to avoid and minimize any adverse effects to these resources. The Tier 2 studies will be guided by the Mid-States Corridor Programmatic Agreement. See FEIS Vol. II, **Appendix P – Section 106 Documentation**.



Tier 2 NEPA studies provide more in-depth review of cultural resources and may identify additional NRHP-eligible properties not documented during this Tier 1 Study. These studies may also result in properties evaluated as potentially NRHP-eligible during Tier 1 being determined not NRHP-eligible.

5.1.5 Environmental Justice

The Tier 1 Environmental Justice analysis included identification of elevated Populations of Concern and their proximity to proposed Build Alternatives. From there the evaluation examined potential relocations within Census Block Groups with elevated Populations of Concern. It also examined potential economic, travel patterns, community cohesion, community services, air quality, and noise impacts. The ability to gather input from EJ communities on the project and its potential impacts was affected by the need to modify outreach efforts due to the pandemic. This broad assessment of potential impacts did not indicate that the effects to EJ populations are more severe or greater in magnitude than the adverse effects to non-EJ populations.

However, the Tier 2 analysis will examine potential impacts to EJ communities in greater detail and will focus on ways to avoid or minimize impacts to EJ populations. The studies will include further analysis of the previously identified areas of concern and targeted EJ outreach including meetings at locations within identified EJ communities, ensuring EJ community representation on stakeholder groups, providing meeting materials in alternative formats and translated for any identified limited English populations, tracking concerns from EJ communities and their resolutions, and tracking attendance and comment responses from EJ communities to ensure effective outreach. Should Tier 2 studies identify disproportionate impacts to EJ communities, detailed mitigation strategies will be prepared. Mitigation to address any such impacts will be completed in consultation with impacted EJ communities.

5.1.6 Relocations

Relocations are anticipated to include residential, commercial and institutional properties. During Tier 2 studies, INDOT will confer with local communities to develop appropriate measures to avoid, minimize and mitigate relocation impacts. Acquisitions and relocations required by the project will be completed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act), as amended, 49 CFR Part 24, and Title VI of the Civil Rights Act of 1964. Relocation assistance and appropriate compensation will be provided to any business or resident displaced.

5.1.7 Agricultural

Tier 2 NEPA studies and subsequent design will seek to minimize use of farmland and disruption of agricultural operations. No specific mitigation for impacts to farmland are anticipated as part of the project.

5.1.8 Mineral Resources

Impacts related to any commercially owned mineral resources will be compensated as provided by the Uniform Relocation Assistance program. All such compensation will be determined according to the INDOT Real Estate Division Manual (March 2020) appraisal procedures during the right-of-way acquisition process following Tier 2.

5.1.9 Noise

The Tier 1 noise impact analysis has identified the likelihood of consideration of noise abatement during Tier 2 studies. Abatement measures such as physical barriers will be considered. Determination of the feasibility and reasonableness of abatement will be conducted according to the INDOT's Traffic Noise Analysis Procedure during Tier 2 studies.



5.1.10 Construction Related

Construction related impacts will be minimized and mitigated in accordance with standard INDOT specifications for construction contracts. Additional measures will be further defined as needed during Tier 2 NEPA studies. These may address issues such as structural and non-structural erosion control, servicing of equipment, spill prevention and containment, blasting, minimization of construction noise, minimization of construction-related air quality impacts and fugitive dust. These will include commitments which are permit conditions or the result of agency coordination. Best Management Practices (BMPs) will be implemented to avoid and/or minimize water quality impacts. Field studies will be completed during Tier 2 to identify special provisions needed to address specific sensitive areas. These BMPs include control measures to mitigate changes to both quantity and quality of runoff from construction activities. Construction-related traffic impacts will be minimized and mitigated through the development of maintenance of traffic plans.

5.1.11 Hazardous Materials

Mitigation recommendations for Properties of Concern (POC) will be site-specific and determined during Tier 2 NEPA studies. Impacts to POCs will be avoided and minimized to the extent possible. Where impacts are unavoidable, mitigation may include soil and/or groundwater testing at identified properties, and/or appropriate removal, transport and disposal of contaminated soil and/or groundwater.

5.1.12 Context Sensitive Solutions

Tier 2 and subsequent design activities will incorporate INDOT requirements for Context Sensitive Design/Solutions into higher-level projects evaluated in an Environmental Impact Statement or Environmental Assessment. INDOT's requirements are documented in *Policy for Context Sensitive Solutions* (<https://www.in.gov/dot/div/contracts/standards/memos/2003/0307-pc.pdf>). Incorporating context sensitive solutions establishes the basis for the development, construction and maintenance processes to incorporate a community's character and desires in transportation improvements. The context sensitive solution process is a flexible approach to allow latitude to enhance environmental, scenic, historic, and unique community elements in a transportation improvement.

5.2 Natural Resources

Significant enhancements were made to commitments pertaining to natural resources in response to agency comments on the DEIS. FEIS, Vol. I, **Chapter 6 – Environmental Commitments** documents these enhancements.

5.2.1 Streams

State and federal permits for impacts to streams will document avoidance and minimization of impacts. Tier 2 design will minimize stream impacts to the greatest extent practicable. Where impacts are unavoidable, a detailed compensatory mitigation plan for impacted streams will be developed as part of the Clean Water Act Section 404/401 permitting process. INDOT and FHWA will continue consultation with appropriate resource agencies in Tier 2 regarding mitigation strategies. Mitigation plans may include the mitigation banks, state in-lieu fee programs, or on-site plans for stream relocations or enhancements. Stream mitigation and monitoring plans will be developed as appropriate. A Stormwater Pollution Prevention Plan (SWPPP) will be developed and approved by INDOT and IDEM prior to construction. A SWPPP will include Best Management Practices (BMPs) to be used during construction of the project to prevent sediment from entering waterways.



5.2.2 Floodplains

The selected alternative was designed to avoid and minimize potential impacts to the floodplain and floodway, in particular longitudinal impacts. It uses to the extent possible existing crossings, places new structures near existing crossings, uses existing roadway corridors, and incorporates transverse crossings of notable rivers such as East Fork White River and Patoka River. The designs in Tier 2 NEPA documents will further minimize potential floodplain and floodway impacts. Structures will be designed to facilitate fish and wildlife passage through the crossing, including during low-flow conditions. All construction in floodways requires a Construction in a Floodway Permit, if not exempt, from the Indiana Department of Natural Resources (IDNR).

5.2.3 Groundwater

Mitigation for groundwater impacts includes a wide range of pre- and post-construction measures. These will follow the Indiana Department of Environmental Management (IDEM) Storm Water Quality Manual, which seeks to prevent contaminants from entering the groundwater. Appropriate BMPs considered during Tier 2 studies will include establishing buffer zones along streams and wetlands, designing ditches to accommodate and treat roadside runoff, and minimizing vegetation and tree clearing. Water, monitoring and injection wells within the project area will be labeled on project plans. These facilities will be properly abandoned or plugged to prevent the migration of potential contaminants.

5.2.4 Wetlands

A detailed compensatory mitigation plan for wetlands unable to be avoided will be completed during Tier 2 NEPA studies and during the Clean Water Act Section 404/401 permitting process. Mitigation plans may include mitigation banks, state in-lieu fee programs, or permittee responsible mitigation and would include temporary avoidance and minimization measures specific to construction.

5.2.5 Protected Species

Section 7 formal consultation with the U.S. Fish and Wildlife Service (USFWS) has been initiated for federally listed and candidate species. Consultation will continue in Tier 2 studies and continue throughout the Tier 2 decision-making on the Mid-States Corridor project. Reasonable efforts will be made to avoid impacts to federally listed species habitat. Coordination with the Indiana Department of Natural Resources for state-listed species has been initiated, and efforts also will be made to avoid impacts to these species and associated high-quality natural communities. Detailed mitigation for impacts to federally and/or state listed species is not determined at Tier 1 for the Mid-States Corridor Study. The Tier 1 Biological Opinion identified general mitigation measures for protected species. Tier 2 studies will include field surveys for species of concern. Their findings will be used to define additional Conservation Measures.

5.2.6 Forest

Upland forests are not a regulated resource, and generally do not require mitigation. However, forest impacts act as an indicator to measure potential impacts to listed bat species. Forest impacts affecting listed bat habitat are addressed as part of formal consultation under Section 7 of the Endangered Species Act. As is typical for larger projects, the U.S. Fish and Wildlife Service and the Indiana Department of Transportation are using a 3:1 forest mitigation ratio (2:1 preservation and 1:1 reforestation) to address bat habitat impacts. These ratios are cited as Conservation Measures in Appendix **PP – Biological Assessment**, for this project and may be addressed through in lieu fee programs or habitat banks.



5.2.7 Ecosystems

Specific mitigation measures for affected wildlife species and ecosystems, as appropriate, will be included as part of Tier 2 NEPA studies. Mitigation strategies may be developed and include actions such as culvert and bridge designs which allow for upstream movement of aquatic life, lighting and fencing to reduce roadkill, avoiding and minimizing forest fragmentation and strategically placed wildlife crossings to permit the movements of reptiles, amphibians and mammals in areas with the highest potential for impacts.

5.2.8 Managed Lands

Efforts to minimize impacts to managed lands will continue in Tier 2 NEPA studies and subsequent design. These efforts will be based upon consultation with management entities. In addition to avoiding direct impacts, reasonable efforts will be made to avoid construction impacts and effects to managed lands from nearby construction activities. These efforts may include grading, culverts and other measures. Mitigation for direct impacts may include tree planting, expanding existing managed lands and allowing continued use, where feasible. Mitigation for impacts to privately-owned properties may entail repaying funding agencies for portions of funds in cost-sharing agreements.

5.3 Monitoring and Enforcement

Frequent communication with resource agencies has occurred throughout the Tier 1 study. INDOT will continue these efforts in greater detail during Tier 2 studies. These efforts have been described earlier in this section. This list is a summary of anticipated communication in Tier 2 and beyond to ensure the development and implementation of monitoring and enforcement of measures to minimize harm.

- **U.S. Fish and Wildlife Service.** Tier 2 Section 7 consultation. Implementation of Tier 1 and Tier 2 Conservation Measures and Terms and Conditions. Post-NEPA monitoring and reporting.
- **U.S. Army Corps of Engineers.** Permitting under Section 404/Section 10 of Clean Water Act. Post-NEPA monitoring of mitigation measures.
- **US Environmental Protection Agency.** Participation in permitting under Section 404/401 of Clean Water Act.
- **State Historic Preservation Officer, Indiana Department of Natural Resources.** Addressing requirements of National Historic Preservation Act. Implementation of Mid-States Corridor Programmatic Agreement and any subsequent Memoranda of Agreement defining mitigation requirements.
- **Indiana Department of Natural Resources.** Obtaining Construction in Floodway permits and associated permit conditions.
- **Indiana Department of Environmental Management.** Obtaining Water Quality Certification under Section 401 of Clean Water Act. Managing any required air quality conformity determinations. Stormwater Pollution Prevention Plan development prior to construction. Conferring on implementation of Best Management Practices for avoiding groundwater contamination.



6. RECORD OF DECISION

For the foregoing reasons and based upon its performance in meeting the project goals, and consideration of all the social, economic and environmental evaluations contained in the FEIS with the input received from other agencies, organizations and the public, the FHWA approves Refined Preferred Alternative P as the Selected Action for this project.

Record of Decision Approval:

Date

**JERMAINE
R HANNON** Digitally signed by
JERMAINE R HANNON
Date: 2023.09.06
16:40:58 -04'00'

Jermaine R. Hannon, Division Administrator
Federal Highway Administration, Indiana Division