



October 15, 2019

Mr. Brian Boszor
Environmental Biologist
Indiana Department of Natural Resources/Fish & Wildlife
4112 State Road 225E
West Lafayette, Indiana 47906

Dear Mr. Boszor:

Subject: Floodway Habitat Mitigation Plan
Construction in a Floodway Permit Application #: FW-29895
Elliott Ditch – Levee & Reach 1-3 Remediation Projects
Arconic Lafayette Operations
3131 East Main Street
Lafayette, Indiana 47905
CEC Project 172-367

On behalf of Arconic Inc., Civil & Environmental Consultants, Inc. (CEC) is pleased to submit this Floodway Habitat Mitigation Plan (Plan) for the above mentioned project. The Plan was prepared in support of a Construction in a Floodway Permit (Permit) application submitted to the Indiana Department of Natural Resources (IDNR) in April 2019 (Application #: FW-29895). CEC trusts that following acceptance of the Plan, the Permit application will be subsequently approved. CEC anticipates interim measure activities, as described in the Permit application, to commence in the Spring of 2020; therefore, mitigation activities will be implemented no later than two years following the initiation of interim measure activities or the Spring of 2022. If you have any questions regarding the provided content, please feel free to contact the undersigned at 865.977.9997.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

Garrett A. Welch, LPG
Project Manager

J. Matthew Bruck, PE
Senior Project Manager

Enclosures

FLOODWAY HABITAT MITIGATION PLAN

**ELLIOTT DITCH – LEVEE REMEDIATION
ARCONIC LAFAYETTE OPERATIONS
3131 EAST MAIN STREET
LAFAYETTE, INDIANA 47905**

Prepared for:



ARCONIC

**MR. ROBERT PREZBINDOWSKI
TENNESSEE OPERATIONS – NORTH PLANT
2300 NORTH WRIGHT ROAD
ALCOA, TENNESSEE 37701**

Prepared by:

**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.
2704 CHEROKEE FARM WAY, SUITE 101
KNOXVILLE, TN 37920**

CEC PROJECT 172-367.0020

OCTOBER 2019



Civil & Environmental Consultants, Inc.

TABLE OF CONTENTS

1.0 EXECUTIVE SUMMARY1

2.0 INTRODUCTION.....2

 2.1 Background..... 2

 2.2 Objective 3

 2.3 Site Selection 3

3.0 EXISTING SITE CONDITIONS4

4.0 MITIGATION PLAN.....5

 4.1 Site Preparation..... 5

 4.2 Understory Herbaceous Seeding - Groundcover 5

 4.3 Understory Shrub and Tree Planting..... 6

 4.4 Schedule 8

 4.5 Protection Of The Mitigation Site..... 8

 4.6 Reporting..... 8

5.0 MAINTENANCE PLAN9

6.0 SUCCESS CRITERIA.....10

7.0 MONITORING PLAN10

 7.1 Woody Plant Survival 10

 7.2 Groundcover Establishment..... 10

 7.3 Overall Site Development..... 10

 7.4 Schedule 11

 7.5 Monitoring Reporting 11

 7.6 Release from Monitoring 11

1.0 EXECUTIVE SUMMARY

Civil & Environmental Consultants, Inc (CEC) has prepared this Floodway Habitat Mitigation Plan (Plan), on behalf of Arconic Inc. (Arconic), in support of a Construction in a Floodway Permit (Permit) application submitted to the Indiana Department of Natural Resources (IDNR) in April 2019 (Application #: FW-29895). The Permit application was submitted in advance of the implementation of the Elliott Ditch Levee Interim Measures Work Plan (IMWP) (Virtual File Cabinet Document Number 82630193) in Lafayette, Indiana (the Site). The IMWP includes the removal of polychlorinated biphenyl (PCB) impacted soil along approximately 2,000-linear feet of the levee¹. The PCB impacts are associated with historic releases from the Arconic Lafayette Operations (Facility) Outfall 001. As part of the IMWP, clearing and grubbing activities will be required in order to access impacted soil for excavation and off-Site disposal. The purpose of this Plan is to present floodway forest mitigation measures to be completed as a result of clearing and grubbing activities associated with the IMWP, as well as, to propose additional mitigation measures for future remedial activities to be completed within Elliott Ditch and along the riparian corridor.

The excavation and removal of soil associated with the IMWP will impact an estimated 0.99 acres of riparian forest in the floodway as stated in the Permit application. In addition, based upon the estimated nature and extent of PCB impacts within Elliott Ditch sediment, CEC estimates that an additional 0.91 acres of riparian forest in the floodway will be disturbed during future remedial activities to allow for access. These future remedial activities are associated with known PCB impacts to soil and sediment from Outfall 001 to the 9th Street crossing. Elliott Ditch floodplain soil and sediment downstream of the 9th Street crossing are yet to be assessed. Additional remediation may be needed, depending on future assessment results. To help restore the ecosystem function at the Site, this Plan proposes a 2:1 restoration mitigation (totaling 3.8 acres) immediately adjacent to Elliott Ditch. The Plan has been developed in accordance with the *Indiana Natural Resources Commission Information Bulletin #17 (Fourth Amendment): Floodway Habitat Mitigation* dated January 15, 2019 (Bulletin). This Plan identifies the mitigation area and lays out guidelines for the preparation of soil and planting of native trees, shrubs, forbs, and ground cover. The Plan identifies additional follow-up activities, in accordance with the Bulletin, to promote the success of Site restoration and enhancement efforts. These efforts include visits to the mitigation site and the submittal of monitoring reports to IDNR documenting the success of habitat restoration. Implementation of the approved Plan will help restore the loss of environmental benefit or ecological function from remedial activities.

¹ The term “levee” refers to soils present immediately adjacent to the left descending bank of Elliott Ditch in the uplands from Arconic Outfall 001 to the existing rail road crossing located approximately 0.5-miles downstream. The levee is not a United States Army Corp of Engineers flood control structure. The levee was likely constructed during historic dredging activities when sediment was mounded in the uplands creating an embankment.

2.0 INTRODUCTION

This Floodway Habitat Mitigation Plan (Plan) describes the mitigation approach to compensate for habitat impacts required as part of remedial activities being completed by Arconic Inc. (Arconic) along Elliott Ditch located in Lafayette, Indiana (i.e., Tippecanoe County) (see **Figures 1 and 2**). As provided in the IDNR Construction in a Floodway Assessment form submitted as part of application number FW-29895, the Levee Interim Measures (IM) project (Project) will disturb approximately 4.15 acres in the floodway. Of the 4.15 acres, riparian habitat disturbance includes an estimated 0.99 acres of non-wetland tree removal and 1.16 acres of successional habitat. In addition, Arconic anticipates the disturbance of up to 0.91 acres of additional non-wetland tree removal as part of future downstream remedial activities (see **Figure 2**) not covered in the Elliott Ditch Levee Interim Measures Work Plan (IMWP). The total unavoidable projected impact requiring mitigation is 1.9 acres (total acreage of non-wetland tree removal); therefore, the total compensatory 2:1 mitigation is 3.8 acres. This Plan includes the following components:

- Project background;
- Project objective;
- Mitigation site selection;
- Existing site conditions;
- Mitigation work plan;
- Maintenance plan;
- Success criteria; and,
- Monitoring plan.

2.1 Background

The Project is being performed to remove PCB-impacted soils for transportation and off-site landfill disposal. The Project is being performed as part of Resource Conservation and Recovery Act (RCRA) Corrective Action administered by the Indiana Department of Environmental Management (IDEM) Office of Land Quality (OLQ) with coordinated approval from the United States Environmental Protection Agency (U.S. EPA), Region 5. As of the date of this Plan, the IDEM has provided conditional approval of the Project; however, coordinated approval from U.S. EPA Region 5 is still pending. Clearing of brush/trees and the installation of a gravel access road will be performed, as necessary, to support removing the targeted soil. Approximately 3,773-cubic yards of soil will be removed for off-site disposal and replaced by roughly 5,190-cubic yards to properly rebuild the levee. Soil removal will be completed within the county drainage easement, which extends 75 feet from the top of the ditch banks. The levee will be rebuilt in 9-inch lifts using clean, cohesive soil from a borrow site. The soil will be placed in 9-inch lifts and compacted to 95-percent Standard Proctor such that the crest elevation is as it was prior to the Project. The restored levee will have a side slope of 2:1 and tie back into existing grade.

Unavoidable impacts to the riparian habitat will be required to support the successful execution of the Project. Arconic proposes that the mitigation site to compensate for this removal be located within the regulated floodway of Elliott Ditch. Another consideration that was evaluated as part of selecting the mitigation site was the presence of an existing City of Lafayette sanitary sewer easement which does not allow tree planting to be completed.

2.2 Objective

The objective of this Plan is to identify the efforts that will be taken to restore the riparian habitat of Elliott Ditch from approximately Concord Road (near Outfall 001) to the 9th Street crossing after completion of the Project. The Plan has been prepared specifically to satisfy the IDNR habitat mitigation requirements as outlined in the *Indiana Natural Resources Commission Information Bulletin #17 (Fourth Amendment): Floodway Habitat Mitigation* dated January 15, 2019 (Bulletin).

2.3 Site Selection

Arconic is committed to performing mitigation activities upon successful completion of the Project and future remediation project(s) from Concord Road (near Outfall 001) to the 9th Street crossing. Remedial activities are currently being planned in addition to the Project, in coordination with U.S. EPA, Region 5 and the IDEM, the extents of which have not been finalized. The methodologies to complete these additional remedial efforts will result in clearing and grubbing activities that have been estimated to include 0.91 acres of riparian forest. Should the disturbance area of future remedial efforts change, additional mitigation may be required, requiring this Plan to be updated. To allow for needed flexibility in the event that additional mitigation is required, Arconic has identified a 13 acre area which will be utilized to accommodate the current known mitigation footprint (i.e., 3.8 acres), as well as, additional mitigation acreage, if necessary. The use of this area is contingent upon property owner approval and acceptance by the Tippecanoe County Drainage Board and City of Lafayette. The latter approval is required since a portion of the targeted mitigation area resides within the drainage easement under control of the drainage board, and due to the presence of a sanitary sewer paralleling Elliott Ditch.

3.0 EXISTING SITE CONDITIONS

The proposed mitigation area is located along the left descending bank of Elliott Ditch (east/south bank), a tributary to Wea Creek, which is a tributary to the Wabash River within the Middle Wabash – Little Vermillion watershed (HUC 05120108) downstream of Lafayette, Indiana. The ditch is identified as a regulated drain until the 9th Street crossing, slightly more than 1.60 miles downstream of Facility Outfall 001. The Tippecanoe County Drainage Board maintains the regulated drains within the county, subject to Indiana Code (IC) 36-9-27. Regulated drains include an easement that typically extends 75-feet from the top of each bank. These easements are intended to provide access for maintenance activities to support proper functionality of the drain. The proposed mitigation site consists of a built environment that has undergone disturbances during establishment of the Elliott Ditch levee, municipal construction, and anthropogenic activities. These activities have ultimately led to a low-quality, riparian habitat consisting largely of pioneer plant species. The proposed mitigation site is depicted on **Figure 3**.

The floodway forest strata at the mitigation site are currently dominated by box elder (*Acer negundo*), eastern white pine (*Pinus strobus*), Amur honeysuckle (*Lonicera maackii*), and wild ginger (*Asarum canadense*). Non-dominant species include honeysuckle (*Lonicera maackii*), white avens (*Geum canadense*), perennial ryegrass (*Lolium perenne*), Virginia creeper (*Parthenocissus quinquefolia*), poison ivy (*Toxicodendron radicans*), giant ragweed (*Ambrosia trifida*), and Frank's sedge (*Carex frankii*). Representative photographs of current site conditions have been provided in **Appendix A**.

As part of investigation activities completed prior the preparation of the IMWP, soil borings were advanced along the levee, as well as at upland locations downstream, to assess soil conditions. For the assessed areas of the levee, a soil horizon of organic material and silty loam was typically present at 0.0 to 0.5-feet below grade. Under this horizon, the majority of soils consist of an aggregate of clay loam, silty clay, and clay with sand. Between 0.5 and 4.0-feet below grade, soils were typically reddish brown or brown to dark brown in color, moderately to very plastic with fine granular structure. Very plastic, black clay with sand was present at some locations along the levee at depths between 2.5 and 4.0-feet below grade. While most samples had gravel content less than 15-percent, isolated horizons less than 0.5-feet in thickness were identified containing greater than 60-percent gravel.

Finally, the City of Lafayette maintains and operates a sanitary sewer along the Elliott Ditch levee. The sanitary sewer line parallels Elliott Ditch in the uplands along the left descending bank and includes a 30-foot easement.

4.0 MITIGATION PLAN

The Plan proposes the restoration and enhancement of 3.8 acres of floodway forest immediately adjacent to Elliott Ditch. As previously stated, Arconic has identified an 8.6 acre area which will be utilized to accommodate the current known mitigation footprint, as well as, additional mitigation acreage, if necessary. **Figure 3** depicts the 8.6 acre footprint identified for restoration and enhancement activities. The Plan recognizes avoidance of impact as the most effective method of mitigating against environmental impact to the Site. Effort will be made to protect existing habitat and reduce impacts to riparian habitat in the area both during planning and execution of remedial activities. Components of the Plan include site preparation, groundcover seeding and species, shrub/tree planting and species, schedule for implementation, protection measures, and reporting.

4.1 Site Preparation

Prior to mitigation planting activities, the soil will be tilled to a depth of 8-inches to improve aeration, infiltration of precipitation, and reduce runoff in the targeted area. Topsoil containing sufficient organic material will be imported and spread over the mitigation area and tilled into the subsurface material, if necessary. Soil amendments (e.g. nitrolized tree bark, organic compost) will be added in approved proportions and tilled into the soil to a depth of up to one-foot across the disturbed mitigation area, if necessary.

An approved erosion and sedimentation control plan will be prepared and implemented to reduce excess runoff and reduce erosion to the mitigation site, and reduce the potential for sedimentation to Elliott Ditch or other nearby tributaries. Engineering controls such as silt fencing installation and sowing temporary seed/mulch on exposed surfaces will be completed, as necessary.

4.2 Understory Herbaceous Seeding - Groundcover

Following soil layer preparation, the mitigation area will be seeded with grasses and herbaceous plants native to Indiana and included in the United States Department of Agriculture (USDA) Plants database specific to Tippecanoe County. A seed mixture will be used that includes at least ten species of grasses sedges and wildflowers identified in **Table 1** provided below. Seeds will be mixed proportionally to ensure that no one species will dominate the understory. Fertilizers will not be used. Areas that are broadcast-seeded will be lightly raked after spread to ensure purchase of seed in soil. Rate of application will be completed as determined by the seed provided.

Table 1			
Plant Species List - Herbaceous			
Scientific Name	Common Name	Strata	Indicator Status
<i>Allium cernuum</i>	Nodding Wild Onion	Wildflower	FACU
<i>Amphicarpaea bracteata</i>	Hog Peanut	Wildflower	FAC
<i>Aquilegia canadensis</i>	Wild Columbine	Wildflower	FAC
<i>Carex blanda</i>	Eastern Woodland Sedge	Sedge	FAC
<i>Carex vulpinoidea</i>	Fox Sedge	Sedge	OBL
<i>Daucus carota</i>	Queen Anne's Lace	Wildflower	UPL
<i>Geranium maculatum</i>	Wild Geranium	Wildflower	FACU
<i>Heliopsis helianthoides</i>	Smooth Oxeye	Wildflower	FACU
<i>Impatiens capensis</i>	Orange Jewelweed	Wildflower	FACW
<i>Juncus tenuis</i>	Poverty Rush	Rush	FAC
<i>Laportea canadensis</i>	Wood Nettle	Wildflower	FACW
<i>Polystichum acrostichoides</i>	Christmas Fern	Forb	FACU
<i>Solidago gigantea</i>	Late Goldenrod	Wildflower	FACW
<i>Vernonia gigantea</i>	Ironweed	Wildflower	FAC
<i>Vernonia missurica</i>	Missouri Ironweed	Wildflower	FACU
Plant Species List - Groundcover			
<i>Schizachyrium scoparium</i>	Little Bluestem	Grass	FACU
<i>Elymus virginicus</i>	Virginia Wildrye	Grass	FACW
<i>Muhlenbergia cuspidata</i>	Plains Muhly	Grass	FACW
<i>Andropogon gerardii</i>	Big Bluestem	Grass	FAC
<i>Dichanthelium latifolium</i>	Broad-leaved Panicgrass	Grass	FACU
<i>Dichanthelium dichotomum</i>	Cypress Panicgrass	Grass	FAC
<i>Desmodium canescens</i>	Hoary tick trefoil	Grass	UPL
<i>Panicum Virgatum</i>	Switch Grass	Grass	FAC
- Note: Equivalent native species may be substituted based upon availability and IDNR Approval			

When seeding along a slope of 3:1 or steeper, additional measures will be used to help establish vegetation. Soil will be stabilized with biodegradable erosion control blankets (i.e., net free or loose woven netting), or a bonded fiber hydro-mulch if seeding occurs during the dormant season.

4.3 Understory Shrub and Tree Planting

Woody plants will be selected and placed in accordance with IDNR's Bulletin to ensure the diversity and ecological function of the mitigation area. To promote the future development of the riparian forest in the floodway, woody vegetation will be randomly placed rather than planted in rows to simulate natural stocking. Key principals include: a minimum of five canopy tree species, four shrub species, and one non-canopy tree species with no one species accounting for more than 20-percent of planted individuals. A maximum of one maple species will be planted and a minimum of two hard mast species will be planted. Spacing will follow the guidelines as established by IDNR.

Species will be selected from a list of approved plants native to Indiana and having been verified by voucher as present in Tippecanoe County per the USDA database. A list of woody plant species is found in **Table 2** provided below. Plants will be selected and distributed per the planting principles included in Section VII.B of the Bulletin. Site selection will also be considered when placing plants (e.g. facultative upland (FACU) plants will be placed in the floodway furthest from Elliott Ditch, facultative wetland (FACW) will be placed in the wettest areas of floodway). Contingency plantings are not considered appropriate due to the potential effect on spacing.

Table 2				
Woody Plant Species List - Trees				
Scientific Name	Common Name	Strata	Coefficient of Conservatism	Indicator Status
<i>Acer saccharinum</i>	Silver Maple	Large Canopy Tree	6	FACW
<i>Acer rubrum</i>	Red Maple	Large Canopy Tree	5	FAC
<i>Aesculus glabra</i>	Buckeye	Large Understory Tree	5	FACU
<i>Carpinus caroliniana</i>	American Hornbeam	Medium Understory Tree	5	FAC
<i>Carya cordiformis</i>	Bitternut hickory	Large Canopy Tree	5	FACU
<i>Celtis occidentalis</i>	Hackberry	Large Canopy Tree	3	FACU
<i>Cornus dummondii</i>	Roughleaf Dogwood	Large Canopy Tree	2	FAC
<i>Fagus grandifolia</i>	American Beech	Large Canopy Tree	8	FACU
<i>Fraxinus pennsylvanica</i>	Green Ash	Tree	1	FACW
<i>Ilex verticillata</i>	Common Winterberry	Medium Canopy Tree	8	FACW
<i>Juglans nigra</i>	Black Walnut	Large Canopy Tree	2	FACU
<i>Morus rubra</i>	Red Mullberry	Medium Understory Tree	4	FACU
<i>Platanus occidentalis</i>	Sycamore	Large Canopy Tree	3	FACW
<i>Quercus Alba</i>	White Oak	Large Canopy Tree	5	FAC
<i>Quercus macrocarpa</i>	Bur Oak	Small Canopy Tree	5	FACU
<i>Quercus muehlenbergii</i>	Chinkapin oak	Medium to Large Canopy Tree	4	FACU
<i>Quercus palustris</i>	Pin Oak	Small Canopy Tree	3	FACW
<i>Quercus rubra</i>	Northern Red Oak	Large Canopy Tree	4	FACU
<i>Robinia pseudoacacia</i>	Black locust	Tree	1	FAC
<i>Sassafras albidum</i>	Sassafras	Medium Understory Tree	1	FACU
<i>Thuja occidentalis</i>	White Cedar	Tree	10	FACW
<i>Tilia americana</i>	American Basswood	Large Canopy Tree	5	FACU
Woody Plant Species List - Shrubs				
<i>Asimina triloba</i>	Pawpaw	Shrub	6	FAC
<i>Cephalanthus occidentalis</i>	Buttonbush	Shrub	5	OBL
<i>Cornus drummondii</i>	Gray Dogwood	Shrub	2	FAC
<i>Cornus obliqua</i>	Pale Dogwood	Shrub	5	FACW
<i>Corylus americana</i>	American Hazlenut	Shrub	4	FACU
<i>Hydrangea arborescens</i>	Wild Hydrangea	Shrub	7	FAC
<i>Ilex verticillata</i>	Winterberry	Shrub	8	FACW
<i>Lindera benzoin</i>	Spicebush	Shrub	5	FAC
<i>Populus deltoides</i>	Eastern Cottonwood	Medium Shrub	1	FAC
<i>Prunus serotina</i>	Black Cherry	Medium Shrub	1	FACU
<i>Ptelea trifoliata</i>	Common Hop-Tree	Medium Shrub	4	FACU
- Note: Equivalent native species may be substituted based upon availability and IDNR Approval				

4.4 Schedule

Implementation of mitigation activities will follow the completion of the Project and subsequent remedial actions from Concord Road (near Outfall 001) to the 9th Street crossing. The Plan will be implemented no later than two years following the commencement of IM activities. Soil preparation will be accomplished during drier conditions (i.e., late spring or summer). If soil preparation is completed in the spring, native and annual groundcover seeding will be completed simultaneously. However, if soil preparation occurs in summer or fall, the native groundcover will be postponed until the following spring. Trees/shrub planting will be completed during the first dormant season following soil preparation and native/annual ground cover seeding.

4.5 Protection Of The Mitigation Site

Arconic will evaluate the need to file a restrictive covenant attached to the mitigation site in order to provide a reasonable period for successful plant establishment. The restrictive covenant would require additional coordination with property owners, as well as, the Tippecanoe County Drainage Board. At a minimum, signs will be installed around the perimeter of the mitigation area, at a minimum spacing of 200-feet, to demarcate the area and will explicitly state that the area is not to be disturbed, including mowing or spraying.

4.6 Reporting

A report documenting the successful implementation of the Plan will be submitted to IDNR within 60 days after the completion of the work. Items to be included in the report include:

- Summary of field activities;
- An as-built survey of the mitigation area;
- List of planted species including stem counts;
- Seed application rates;
- Photographic documentation; and,
- Proposed monitoring points for IDNR's consideration.

5.0 MAINTENANCE PLAN

Maintenance will be conducted on an as needed basis based upon findings from regular site visits (i.e., semi-annual) performed as part of the Monitoring Plan. Maintenance activities may include:

- Reseeding or replanting;
- Watering;
- Control of invasive species; and,
- Erosion repair.

Completed maintenance activities will be disclosed to IDNR during annual reporting (see **Section 6**).

6.0 SUCCESS CRITERIA

Non-wetland forest mitigation success will be measured based upon percent survival of planted trees and shrubs (75-percent per acre). Total vegetation cover criteria includes 80-percent cover, and of the 80-percent, 75-percent being of native species. In addition, erosion/sedimentation will be evaluated and corrected, as necessary. The mitigation site will be evaluated against this criteria on an annual basis for a minimum of three years, or until the success criteria are satisfied. After three years, assuming success criteria have been satisfied, monitoring will be terminated.

7.0 MONITORING PLAN

Mitigation success will be assessed by the execution of a monitoring plan for three years. An annual monitoring report based upon routine site visits will document progress toward meeting the success criteria. Elements of the monitoring report are defined in Section IX of the Bulletin. The monitoring report will be submitted to the IDNR every year for three years after a full growing season elapses. Monitoring reports will continue on an annual basis should monitoring continue beyond three years until year five. In the event that mitigation is determined to not have been successful after year five, another mitigation plan will be submitted that includes an extended monitoring period along with corrective actions. Success of mitigation will be based on the criteria listed above and further defined in Section IX.B of the Bulletin.

7.1 Woody Plant Survival

Woody plant species will be monitored through stem counts within one, surveyed permanent rectangular plot. The plot will be approximately 0.1 acres, and a comprehensive list of woody species observed will be maintained.

7.2 Groundcover Establishment

Percentage of groundcover will be evaluated within the surveyed permanent rectangular plot identified in **Section 6.1**. Observed species within the plot will be identified and assigned a standard Daubenmire percent cover class, or a similar approach will be completed. A comprehensive list of herbaceous species observed will be maintained.

7.3 Overall Site Development

During monitoring visits, the mitigation site will be inspected for:

- Areas of erosion;
- Instability;

- Presence of invasive species;
- Vandalism; and,
- Trash dumping.

Photographic documentation will be completed of overall site conditions and plant communities.

7.4 SCHEDULE

Monitoring will include a minimum of two visits per year (i.e., one in the late spring/ early summer, and one in the late summer/early fall). Monitoring will begin in the first growing season following planting activities. Monitoring will be conducted for three years, or until the performance standards have been met and the project has received release from IDNR.

7.5 MONITORING REPORTING

Annual monitoring reports will be submitted to IDNR summarizing field data and will discuss project success against the criteria presented above. The annual report will be submitted by December 31 of the calendar year.

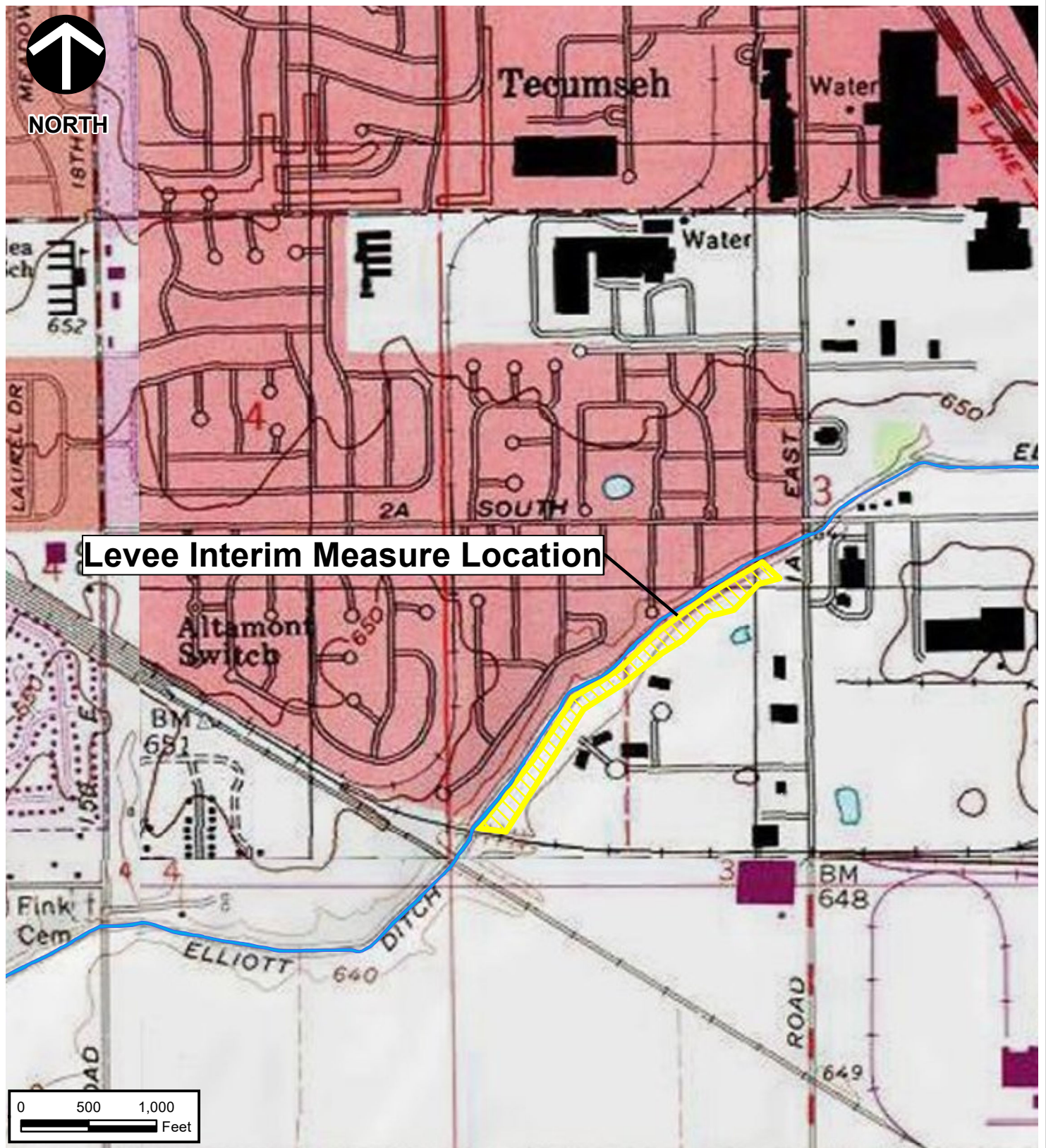
7.6 RELEASE FROM MONITORING

Once the performance standards are met, the project will be considered complete and Arconic will be released from further monitoring.

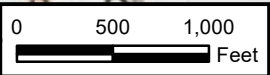
FIGURES



NORTH



Levee Interim Measure Location



SOURCE: ESRI WORLD IMAGERY / ARCGIS MAP SERVICE: HTTP://GOTO.ARCGISONLINE.COM/MAPS/WORLD_IMAGERY. LAST ACCESSED: 9/3/2019
IMAGE DATE: 03/12/2011



Civil & Environmental Consultants, Inc.

2704 Cherokee Farm Way, Suite 101 Knoxville, TN 37920

865-977-9997 - 865-774-7767

www.cecinc.com

ARCONIC INC. - LAFAYETTE OPERATIONS
HABITAT MITIGATION PLAN
LAFAYETTE, INDIANA

ELLIOTT DITCH SITE LOCATION MAP

DRAWN BY:	GDS	CHECKED BY:	GAW	APPROVED BY:	JMB*	FIGURE NO:
DATE:	SEPTEMBER 03, 2019	DWG SCALE:	1" = 1,000'	PROJECT NO:	172-367.0020	1

Signature on File *

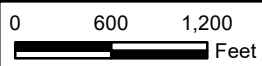


NORTH




Brady Ln

S 9th St

Concord Rd



Legend

-  Approximate Location of Future Remedial Activities
-  Levee Interim Measure Location
-  Elliott Ditch

SOURCE: ESRI WORLD IMAGERY / ARCGIS MAP SERVICE: HTTP://GOTO.ARCGISONLINE.COM/MAPS/WORLD_IMAGERY. LAST ACCESSED: 9/6/2019
IMAGE DATE: 03/12/2011



Civil & Environmental Consultants, Inc.

2704 Cherokee Farm Way, Suite 101 Knoxville, TN 37920

865-977-9997 - 865-774-7767

www.cecinc.com

ARCONIC INC. - LAFAYETTE OPERATIONS
HABITAT MITIGATION PLAN
LAFAYETTE, INDIANA

REMEDIAL ACTIVITY LOCATIONS

DRAWN BY: GDS	CHECKED BY: GAW	APPROVED BY: JMB*	FIGURE NO: 2
DATE: SEPTEMBER 06, 2019	DWG SCALE: 1" = 1,200'	PROJECT NO: 172-367.0020	

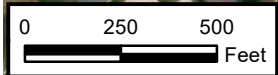
P:\2017\172-367-Draw Documents\Task.0020 - Tree Mitigation Plan\Figure\GIS\172-367.0020_Elliott Ditch Mitigation_L_Figure 2.mxd - 9/6/2019 - 11:27:02 A.M. (gschwartz)

Signature on File *



Legend

- Proposed Mitigation Site - 13 Acres
- FEMA 100-Year Floodway (2014)
- Elliott Ditch



SOURCE: ESRI WORLD IMAGERY / ARCGIS MAP SERVICE: [HTTP://GOTO.ARCGISONLINE.COM/MAPS/WORLD_IMAGERY](http://gto.arcgis.com/maps/world_imagery). LAST ACCESSED: 9/6/2019
 IMAGE DATE: 03/12/2011



Civil & Environmental Consultants, Inc.
 2704 Cherokee Farm Way, Suite 101 Knoxville, TN 37920
 865-977-9997 - 865-774-7767
www.cecinc.com

ARCONIC INC. - LAFAYETTE OPERATIONS
 HABITAT MITIGATION PLAN
 LAFAYETTE, INDIANA

PROPOSED MITIGATION SITE

DRAWN BY: GDS	CHECKED BY: GAW	APPROVED BY: JMB*	FIGURE NO: 3
DATE: SEPTEMBER 06, 2019	DWG SCALE: 1" = 500'	PROJECT NO: 172-367.0020	

Signature on File *

P:\2017\172-367-Draw Documents\Task.0020 - Tree Mitigation Plan\Figure\GIS\172-367.0020_Elliott Ditch Mitigation_L_Figure 3.mxd - 9/6/2019 - 11:51:36 A.M. (gschwartz)

APPENDIX A – PHOTO LOG



NORTH

BRADY LANE

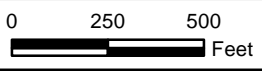
FLOW

PROJECT LOCATION

CONCORD ROAD

ELLIOTT DITCH

Applicant: Arconic Inc.
Agent: CEC, Inc.



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



Civil & Environmental Consultants, Inc.

2704 Cherokee Farm Way, Suite 101 Knoxville, TN 37920

865-977-9997 - 865-774-7767

www.cecinc.com

ARCONIC INC.
LAFAYETTE OPERATIONS
ELLIOTT DITCH LEVEE SOIL REMEDIATION
LAFAYETTE, INDIANA

PHOTO LOCATION MAP

DRAWN BY:

JMB

CHECKED BY:

KAM

APPROVED BY:

TLM*

FIGURE NO:

DATE:

MARCH 22, 2019

DWG SCALE:

1" = 500'

PROJECT NO:

172-367.0011

A-1

Signature on File *

P:\2017\172-367-GIS\Maps\IDNR Permits\172-367 ED IDNR 8-2 Figure3.mxd - 3/22/2019 - 11:48:20 AM (mbruck)



Photo 1: Levee view from northeast extent, facing southwest (Location 1)

(Photo Date: 3/21/19)



Photo 2: Elliott Ditch bank conditions, facing southwest (Location 1)

(Photo Date: 3/21/19)



Photo 3: Levee/Elliott Ditch bank view, facing northeast (Location 2)

(Photo Date: 3/21/19)



Photo 4: Levee/Elliott Ditch bank view, facing southwest (Location 2)

(Photo Date: 3/21/19)



Photo 5: Arconic Outfall 001, showing Elliott Ditch bank conditions, facing west (Location 3)

(Photo Date: 3/21/19)



Photo 6: Levee/Elliott Ditch bank view showing Outfall 001, facing southwest (Location 2)

(Photo Date: 3/21/19)



Photo 7: Levee/Elliott Ditch bank conditions, facing northeast (Location 3)

(Photo Date: 3/21/19)



Photo 8: Levee conditions, facing east-northeast (Location 3)

(Photo Date: 3/21/19)



Photo 9: Elliott Ditch conditions, facing southwest, downstream (Location 4)

(Photo Date: 10/3/17)



Photo 10: Elliott Ditch conditions, longitudinal bar, facing southwest, downstream (Location 4)

(Photo Date: 10/3/17)



Photo 11: Levee/Elliott Ditch bank conditions, facing northeast (Location 5)

(Photo Date: 3/21/19)



Photo 12: Levee/Elliott Ditch bank conditions, facing west (Location 5)

(Photo Date: 3/21/19)



Photo 13: Levee conditions, facing northeast (Location 6)

(Photo Date: 3/21/19)



Photo 14: Levee/Elliott Ditch bank conditions, facing west (Location 6)

(Photo Date: 3/21/19)



Photo 15: Levee/Elliott Ditch bank conditions, facing northeast (Location 7)

(Photo Date: 3/21/19)



Photo 16: Levee conditions, facing southwest (Location 7)

(Photo Date: 3/21/19)



Photo 17: Elliott Ditch bank conditions, facing west (Location 7)

(Photo Date: 3/21/19)



Photo 18: Elliott Ditch bank conditions, facing west-northwest (Location 7)

(Photo Date: 3/21/19)



Photo 19: Elliott Ditch conditions, facing northeast, upstream (Location 8)

(Photo Date: 10/3/17)



Photo 20: Elliott Ditch conditions, facing southwest, downstream (Location 8)

(Photo Date: 10/3/17)



Photo 21: Levee conditions, facing northeast (Location 9)

(Photo Date: 3/21/19)



Photo 22: Levee conditions, facing southwest (Location 9)

(Photo Date: 3/21/19)



Photo 23: Levee/Elliott Ditch bank conditions, facing west (Location 9)

(Photo Date: 3/21/19)



Photo 24: Levee conditions, facing northeast (Location 10)

(Photo Date: 3/21/19)



Photo 25: Levee conditions, facing northeast (Location 10)

(Photo Date: 3/21/19)



Photo 26: Levee conditions, facing southwest (Location 10)

(Photo Date: 3/21/19)



Photo 27: Levee/Elliott Ditch bank conditions, facing west (Location 10)

(Photo Date: 3/21/19)



Photo 28: Upland conditions (typical), facing east (Location 10)

(Photo Date: 3/21/19)



Photo 29: Elliott Ditch conditions, facing northeast, upstream (Location 11)

(Photo Date: 10/4/17)



Photo 30: Elliott Ditch conditions, facing southwest, downstream (Location 11)

(Photo Date: 10/4/17)



Photo 31: Levee and upland conditions, facing northeast (Location 12)

(Photo Date: 3/21/19)



Photo 32: Levee/Elliott Ditch bank conditions, facing southwest (Location 12)

(Photo Date: 3/21/19)



Photo 33: Elliott Ditch conditions, facing northeast, upstream (Location 13)

(Photo Date: 10/4/17)



Photo 34: Elliott Ditch conditions, facing southwest, downstream (Location 13)

(Photo Date: 10/4/17)