



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

September 19, 2017

This letter was sent to the listed parties.

RE: I-65/I-70 North Split Interchange Reconstruction Project (Des. Numbers (Nos.) 1592385 & 1600808)

Dear Consulting Party (see attached list),

The Indiana Department of Transportation (INDOT) with funding from the Federal Highway Administration (FHWA) proposes to proceed with the I-65/I-70 North Split Interchange Reconstruction Project in the City of Indianapolis, Marion County (Des. Nos. 1592385 & 1600808). HNTB Indiana is under contract with INDOT to advance the environmental documentation for the referenced project.

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

Project Location

The proposed undertaking includes the I-65/I-70 North Split Interchange south along I-65/I-70 to the Washington Street interchange in downtown Indianapolis; including the portion of I-65 west of the North Split interchange to approximately Meridian Street and the portion of I-70 east of the North Split interchange to approximately the bridge over Valley Avenue (west of the Keystone Avenue/Rural Street interchange) in Marion County, Indiana. It is within Center Township, Beech Grove United States Geological Survey (USGS) Topographic Quadrangle, in Section 36, Township 16N, Range 3E; Sections 1 and 12, Township 15N, Range 3E; and Section 31, Township 16N, Range 4E. Please see attached general location and USGS topographic maps (Figures 1 and 2).

Purpose and Need

The needs for the project include the following:

1. **Deteriorated Condition of Bridges** - A primary need of the project is the deteriorated condition of the 32 existing bridges within the project area. The existing conditions of the bridges are documented in INDOT Routine Bridge Inspection Reports. The estimated remaining life of the bridges in the study area ranges from two years to 10 years.
2. **Deteriorated Condition of Pavement** - A second need of the project is the deteriorated condition of the pavement within the project area. According to the INDOT Greenfield District, the mainline pavement has low friction numbers (the pavement is slippery when wet), the shoulders are aged and starting to

oxidize and ravel out, and the concrete just south of the North Split interchange is in constant need of patching.

3. Interchange Operation Issues - A third need includes the operational issues associated with the I-65/I-70 North Split interchange. The INDOT Corridor Development Office prepared a Project Intent Report dated July 18, 2016. The purpose of the Project Intent Report is to outline INDOT's planned approach to improve mobility on I-65 from Vermont Street to Fall Creek and on I-70 from I-65 north junction to I-465 east leg in Indianapolis, including the North Split interchange. In general, there are capacity issues throughout the interchange which are made worse due to excessive weaving movements and loss of through lanes. The following issues have been identified within the interchange:
 - According to the Project Intent Report, a substantial amount of the traffic arriving at the interchange and continuing northbound on I-65 uses the Pennsylvania Street, Meridian Street, and Illinois Street exit complex at the right, or the West Street exit on the left. The major junction of two interstate highways combined with the very close proximity of two exits results in extreme turbulence within the weaving areas.
 - Traffic from westbound I-70 to I-65 north (on the right) must merge left at the Pennsylvania/Meridian/Illinois Street exit complex (also on the right) which introduces further complication to the situation.
 - The eastbound weave from the Pennsylvania Street entrance ramp to eastbound I-70 is difficult for drivers because they must cross several lanes of traffic in a short distance.
 - The westbound I-70 and southbound I-65 junction is a traffic bottleneck as motorists attempt to merge. Eastbound I-70 has a tight radius that causes vehicles to slow down and increases congestion. The fact that I-70 and I-65 enter and exit on different sides of the north/south section causes weaving and turbulence.
4. Congestion - Another need is the existing and future capacity deficiency within the project area. As demonstrated by the Project Intent Report, roadway capacity and traffic congestion are severe issues along I-65 and I-70 within and adjacent to the project area.
5. Safety - Based on the operational issues within the interchange and congestion within the project area, safety concerns are likely to be an additional need. A safety analysis will be completed that investigates crash rates in the project area to determine if they are higher than anticipated for an interstate facility.

The purposes of the project are to:

1. Correct the condition of the bridges within the project area and extend the remaining life of the structures to at least 25 years.
2. Improve the condition of the pavement within the project area.
3. Improve operational issues within the I-65/I-70 North Split interchange.
4. Reduce congestion along I-65 and I-70 within the project area. This purpose will not be fully realized until adjacent projects of independent utility are constructed and the additional lanes are striped.

5. Improve safety within the North Split interchange if safety is determined to be a need for the project. The correction of operational issues and improvements in traffic congestion are anticipated to result in a reduction of crash rates.

Project Scope of Work

The anticipated project scope includes the following elements:

1. Reconstruction of the North Split interchange;
2. Reconfiguration of the I-65 exit/entrance ramps along 11th and 12th Streets;
3. Rehabilitation, replacement and/or widening of 32 bridges within the project area;
4. Reconstruction of the pavement throughout the project area;
5. Widening of pavement for an additional through lane. Per the findings in INDOT's Project Intent Report, an additional mainline through lane through the interchange is required to meet the operational needs of the design year (2040). The additional lane will not be opened until completion of the adjacent projects. The adjacent added capacity projects will be studied as separate NEPA actions; and,
6. Traffic signal modifications along I-65 westbound at 12th Street and Pennsylvania Street; I-65 westbound at 12th Street and Illinois Street; I-65 eastbound at 11th Street and Delaware Street; I-65/I-70 at Pine Street and Michigan Street; and I-65/I-70 at Ohio Street and College Avenue.

Additional alternative configurations will also be investigated as part of the NEPA process.

Section 106 Consultation

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

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <http://www.achp.gov/citizensguide.pdf>. If invited consulting parties are aware of any other potential consulting parties that should be invited to participate in Section 106 consultation, please list them in your comments regarding the project.

Proposed Area of Potential Effects (APE)

The project is in the very early stages of the environmental process and the project team is soliciting input from consulting parties regarding the proposed APE. The APE is the area in which the proposed project may cause alterations in the character or use of historic resources. INDOT's Cultural Resources Manual recommends a 0.25-mile buffer (which may be increased or decreased based on surrounding topography and built

environment) for a new bridge overpass or bridge replacement on raised elevation. For the I-65/I-70 North Split Interchange Reconstruction Project the proposed APE is at least a 0.25-mile buffer from the proposed work along I-65 and I-70. Preliminary estimates indicate at least one bridge in the interchange may be approximately 48 feet higher than the existing bridge height. The 48-foot height increase assumes there will be four bridge levels. This is intended to be a conservative estimate and proposed bridge heights will likely decrease as additional design information becomes available. Due to this possible increase in bridge height, the APE surrounding the interchange is proposed to be increased to 0.5 mile (Figure 3).

To ensure the 0.5-mile distance was appropriate, project team members, including a qualified professional (QP) who meets the Secretary of the Interior's Professional Qualification Standards as per 36 CFR Part 61, first visited a similar interchange at I-465 and I-74 on the east side of Indianapolis. This interchange was chosen as an example because it has a similar number of bridge levels, approximately 3 to 3.5 and is in relatively open terrain, which would provide a conservative estimate when compared to the I-65/I-70 North Split interchange area which is highly developed. The built environment at I-74/I-465 is more open, and is a combination of agricultural and suburban development. The team drove the surrounding areas at intervals of 0.25 mile, 0.50 mile, and 1 mile, documenting the visibility of the I-465/I-74 interchange at each interval in different quadrants of the interchange for comparative purposes. At approximately 1 mile, vegetation, buildings or topography typically shielded the I-465/I-74 interchange bridge and it could not be seen. At 0.50 mile, if there were no buildings or vegetation to block the view and the interchange bridge could be seen, it was not an overpowering feature of the landscape. At 0.25 mile, the interstate bridge could be readily seen or seen between buildings or vegetation.

The project team then visited the area surrounding the I-65/I-70 North Split interchange. The Intelligent Transportation System (ITS) tower in the eastern portion of the I-65/I-70 North Split interchange is approximately 15 feet higher than the top of a 13.5-foot tall truck on the tallest proposed bridge. The project team used this ITS tower as a visual guide to investigate intervals of 0.25 mile and 0.50 mile to determine if it was visible from various locations along the east-west axis along 16th, 17th, 19th, and 20th Streets. The intersection of 20th Street and Lewis Street is approximately 0.5 mile from the existing interchange (Figure 3). Due to the density of development surrounding the project area, the project team agreed the new bridge would not be visible or only minimally visible and was comfortable that 0.5-mile would be a conservative distance for the APE in this area.

Along the remainder of the project area (I-65/I-70 south to the Washington Street, I-65 west to Meridian Street, and I-70 east to approximately the bridge over Valley Avenue), the proposed APE started with a 0.25-mile buffer area in each direction. To confirm the APE in this portion of the project area, project team members, including a QP, drove the proposed APE to determine where the APE could be reduced due to restricted sight lines or increased due to viewshed. The APE varies from 0.25 mile to 0.50 mile for the project area outside of the North Split interchange.

At this time, no cultural resource investigations have occurred; however, the results of cultural resource identification and evaluation efforts, both aboveground and archaeological, will be forthcoming. Consulting parties will receive notification when these reports are completed.

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

Consulting Parties Meeting

We would like to invite you to participate in a Consulting Parties Meeting on Friday October 6, 2017, at the Indiana Historical Society at 450 West Ohio Street, Indianapolis, Indiana 46202 from 9:30 a.m. to 11:30 a.m. Indianapolis time. Parking is available in the parking lot north of the building off New York Street (parking tickets for the lot will be validated by the Indiana Historical Society). You may participate in person or by Webex and conference call using the information below. At this meeting, we will discuss the project, the Area of Potential Effects (APE), and next steps in the Section 106 consultation process.

[Click here for Webex](#) or type:

<https://hntb.webex.com/hntb/j.php?MTID=m6539422cd60b55091bcd87960f03595>

Meeting number (access code): 745 749 759

Meeting password: cW24wZV7

Join by phone

+1-415-655-0002 US Toll

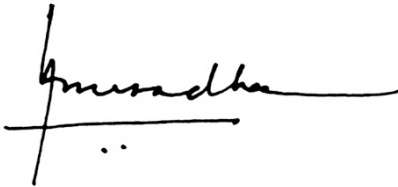
+1-855-797-9485 US Toll free

For questions concerning specific project details, you may contact Kia Gillette of HNTB Indiana at 317-636-4682 or kgillette@hntb.com. All future responses regarding the proposed project should be forwarded to HNTB Indiana at the following address:

Kia Gillette
Environmental Project Manager
HNTB Indiana
111 Monument Circle
Indianapolis, Indiana 46204
kgillette@hntb.com

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317- 233-6795 or Michelle Allen at FHWA at michelle.allen@dot.gov or 317-226-7344.

Sincerely,



Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

General Project Location Map
APE on USGS Topographic Map
APE on 2016 Aerial Photograph Map
Draft Consulting Parties Meeting Agenda

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Distribution List: IDNR-Division of Historic Preservation and Archaeology
U.S. Army Corps of Engineers
Indiana Landmarks
National Park Service, Midwest Region
Citizens Neighborhood Coalition
Indy Chamber
Historic Urban Neighborhoods of Indianapolis
Indianapolis Historic Preservation Commission
Downtown Indy, Inc.
Herron-Morton Place Association
Old Northside Neighborhood Association
Old Northside Land Use Committee
Benjamin Harrison Presidential Site
St. Joseph Historic Neighborhood Association
Chatham Arch Neighborhood Association
Lockerbie Square People's Club
James Whitcomb Riley Museum Home
Windsor Park Neighborhood
Holy Cross Neighborhood Association
Cottage Home Neighborhood Association
Massachusetts Avenue Merchants Association
Arsenal Technical High School
Indianapolis Department of Metropolitan Development
Indianapolis Metropolitan Planning Organization
Office of the Mayor
Mayor's Neighborhood Advocate, Area 10
Mayor's Neighborhood Advocate, Area 7
Mayor's Neighborhood Advocate, Area 8
Mayor's Neighborhood Advocate, Area 9
Marion County City-County Council
Marion County Historian
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Hendricks Commercial Properties
Delaware Nation of Oklahoma
Eastern Shawnee Tribe of Oklahoma
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Pokagon Band of Potawatomi

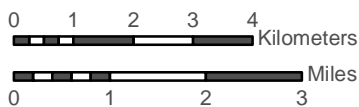
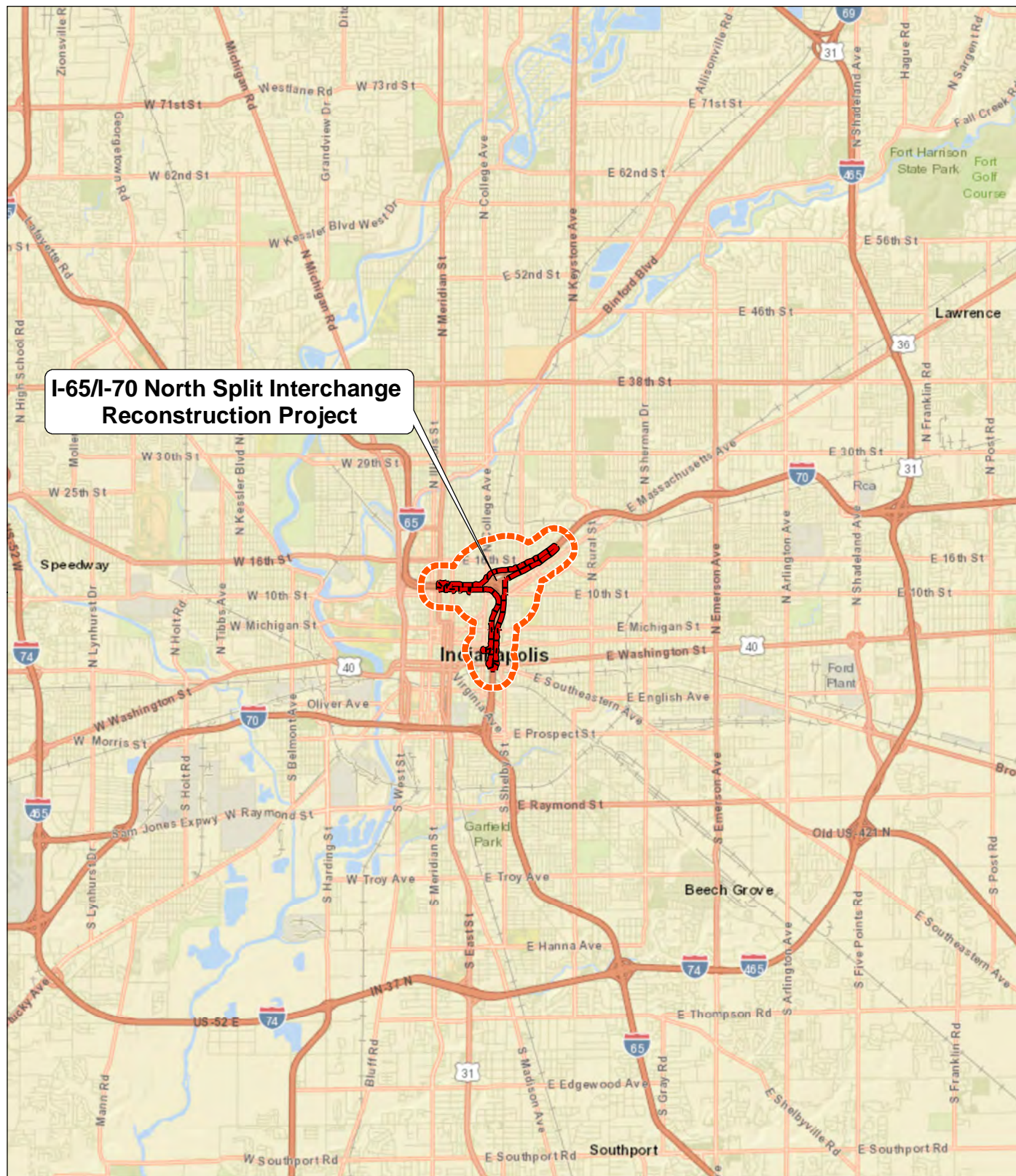
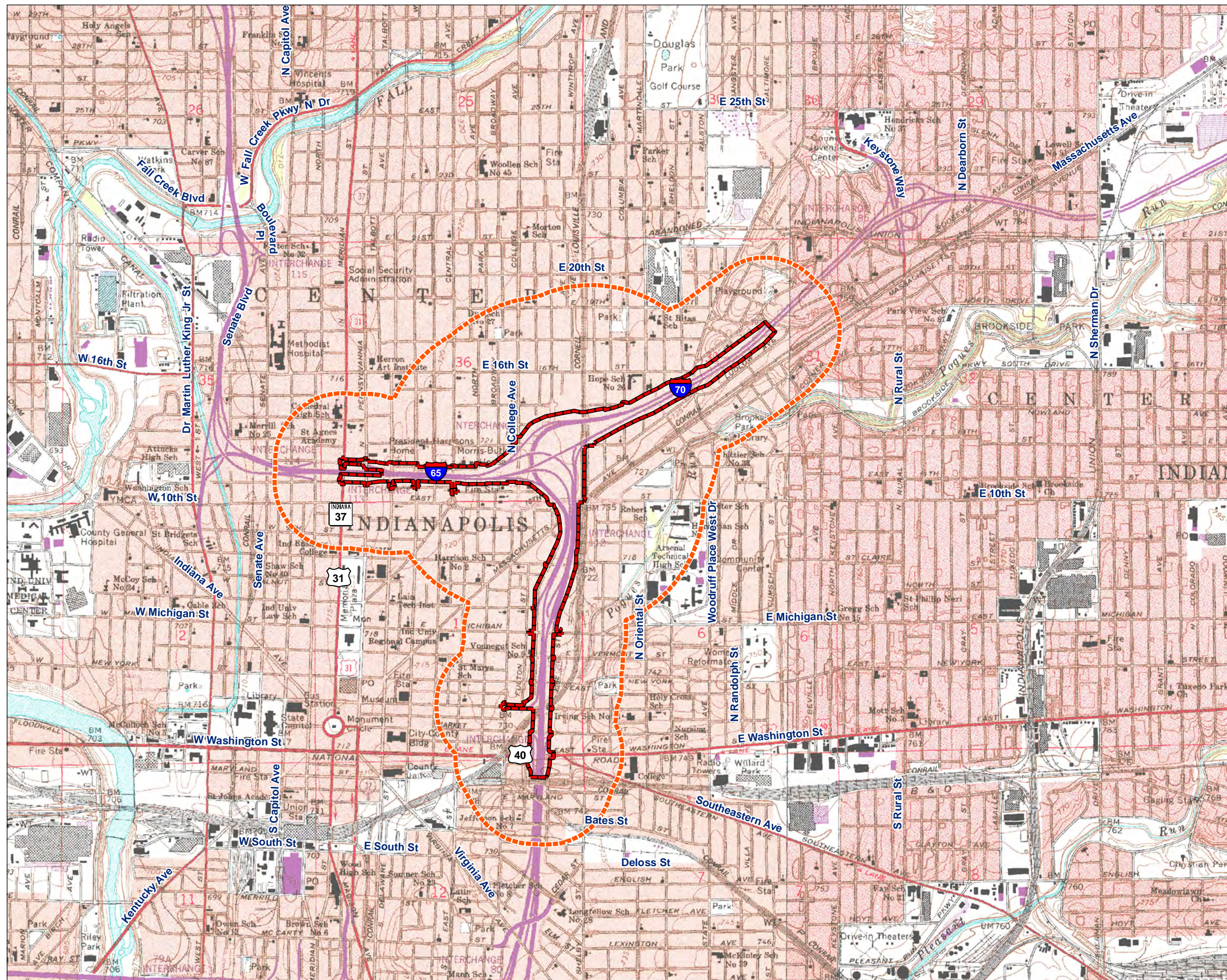


Figure 1

General Project Location Map.

Base: ESRI World Street Map



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project DRAFT APE

Base: USGS Indianapolis East and Indianapolis West, Indiana, 7.5' series quadrangles



0 200 400 600 800 1000 Meters
0 600 1200 1800 2400 3000 Feet

Figure 2
DRAFT APE on USGS Topographic Map.

I-65/I-70 North Split Interchange Reconstruction

Section 106 Consulting Parties Meeting Agenda

Indiana Historical Society – 9:30 a.m. – 11:30 a.m. – October 6, 2017

1. Welcome & Introductions (FHWA & INDOT) (10 minutes)
2. Purpose of Meeting (HNTB) (5 minutes)
3. Section 106 Process (HNTB) (10 minutes)
 - a. What is Section 106?
 - b. Role of Consulting Party
 - c. Section 106 Steps for North Split Project
4. Project Overview (HNTB) (20 minutes)
5. Area of Potential Effects (ASC Group) (10 minutes)
6. Archaeology Update (ASC Group) (10 minutes)
7. Next Steps (HNTB) (10 minutes)
8. Consulting Party Feedback (HNTB) (15 minutes)
 - a. Other Consulting Parties
 - b. Meeting Location
 - c. Area of Potential Effects
 - d. Other
9. Questions? (20 minutes)