



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

January 8, 2018

This letter was sent to the listed parties.

RE: Dual Review Project: I-65/I-70 North Split Interchange Reconstruction Project
(Designation (Des.) Numbers (Nos.) 1592385 & 1600808)
Section 106 Update Memo #1

Dear Consulting Party,

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 Corporation is under contract with INDOT to advance the environmental documentation for the referenced project.

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; 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 Attachment A for general location and USGS topographic maps.

Project Scope of Work

The anticipated project scope includes the following elements. Items one through six were included in the original Section 106 early coordination letter (dated September 19, 2017) for the project. Items seven and eight have recently been added to the proposed scope of work. Additional alternative configurations will also be investigated as part of the National Environmental Policy Act (NEPA) process.

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. Addition of through lanes where determined necessary;

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;
7. Replacement of lighting along I-65 and I-70 within the project area; and
8. Replacement and possible addition of interstate guidance signs along I-65 and I-70. This work may be completed outside the current Area of Potential Effects (APE). Because it will be completed within the existing interstate right-of-way and involves the replacement or addition of similar existing signs, an expansion of the APE is not recommended for this work. If this work was completed independently of this project, it would be covered under Category A of the Section 106 Minor Projects Programmatic Agreement (MPPA) which consists of projects that, by their nature, have no effects on properties listed in or eligible for the National Register of Historic Places (NRHP).

State Certificate Approval Dual Review Process

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

Above-Ground Historic Properties

The APE is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE for the North Split Project contains the following historic resources:

- Ten existing NRHP-listed historic districts
- Twenty-seven individually NRHP-listed resources
- One resource determined NRHP eligible
- One Indiana Register of Historic Sites and Structures (IRHSS) historic district that is not listed in the NRHP
- Two individually IRHSS-listed resources that are not listed in the NRHP
- Two National Historic Landmarks (NHL)
- One NRHP eligible bridge
- Seven resources recommended individually eligible for the NRHP
- Two historic districts recommended eligible for the NRHP

The Historic Property Report (HPR) is available for review in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). The HPR management summary lists each resource from the bullet list above and is included in Attachment C of this letter. You are invited to review this letter and the HPR, and respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the

environmental document. If you prefer a hard copy of this material, please respond to this email with your request within seven days.

Archaeological Properties

With regards to archaeological resources, an archaeologist who meets the Secretary of the Interior's standards completed a Phase Ib Archaeological Records Check and Reconnaissance Survey for portions of the I-65/I-70 North Split Interchange. The report is under development and will be forwarded to the State Historic Preservation Officer (SHPO) and Indian Tribes when complete.

Traffic Diversion and APE Expansion Methodology

The original Section 106 APE was submitted to the SHPO and Consulting Parties for review in the early coordination letter dated September 19, 2017 and discussed at the Consulting Parties meeting on October 6, 2017. At this time, INDOT and FHWA are proposing to expand the Section 106 APE based on anticipated temporary traffic increases on city streets during construction of the North Split project. INDOT and FHWA believe the unique circumstances of this project, including the project location in downtown Indianapolis, the density of historic properties within the original APE, and the potential duration for construction (potentially multiple construction seasons) require special consideration of the potential effects of temporary traffic increases. INDOT and FHWA do not intend to expand the APE for potential traffic diversion during construction for all projects in the future.

The methodology used to determine the proposed APE expansion is included in Attachment D of this letter. FHWA and INDOT first reviewed the Section 106 definition of "effect." Per 36 CFR 800.16(i), an "effect" is an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP. This evaluation focused on whether there was the possibility for an effect under Section 106. FHWA and INDOT acknowledge that traffic diversion during construction will result in temporary impacts to the community beyond the Section 106 consultation process and will work to minimize these impacts. However, Section 106 requires the focus to be on effects to historic properties.

FHWA and INDOT then reviewed the criteria of adverse effect. Per 36 CFR 800.5(a)(1), an adverse effect is found "when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association."

Based on the review of the criteria and examples of adverse effects found in 36 CFR 800.5, INDOT and FHWA recommend expanding the North Split project APE based on the temporary increases in heavy truck traffic along city streets during construction. Increases in heavy truck traffic have the potential to physically damage contributing features of historic properties.

There will be many trucks that must access downtown Indianapolis to make deliveries or access current downtown area commercial/industrial properties. Probable patterns of heavy truck use along city streets were identified and the routes listed below are included in the proposed expansion of the APE. A map of these routes is included in Attachment D.

- Rural Street, from the I-70 interchange south to Washington Street – Rural Street/Keystone Avenue is the last open exit for I-70 heading westbound. Trucks can exit at Rural Street, head south and turn west on Washington Street. The Washington Street ramp to I-65 south and I-70 west will remain open and trucks can access the interstates at this location.
- Washington Street, from Rural Street west to original APE – Rural Street/Keystone Avenue is the last open exit for I-70 heading westbound. Trucks can exit at Rural Street, head south and turn west on Washington Street. The Washington Street ramp to I-65 south and I-70 west will remain open and trucks can access the interstates at this location.

- Massachusetts Avenue, from original APE east to Rural Street – Trucks will be able to exit I-70 to Rural Street and head southwest on Massachusetts Avenue to downtown. Massachusetts Avenue parallels I-70 and is primarily an industrial corridor.
- West Street, from the I-65 interchange south to the I-70 interchange – The I-65/West Street interchange will remain open during construction. Trucks will be able to exit and head south on West Street to the I-70 interchange.
- Missouri Street, from West Street south to the I-70 interchange – The I-70/West and Missouri Streets interchange will remain open during construction. Trucks will be able to exit and head north on Missouri Street, then north on West Street to the I-65 north interchange.
- Fall Creek Parkway, from 38th Street south to College Avenue – Trucks coming downtown from the northeast side of the city can use Binford Boulevard and Fall Creek Parkway to link with north-south arterials to downtown. The first available route is College Avenue.
- College Avenue, from Fall Creek Parkway south to original APE – Trucks using Fall Creek Parkway can take College Avenue south into the downtown area.
- Fort Wayne Avenue, from original APE south to St. Clair Street – Trucks can take Massachusetts Avenue southwest to 10th Street, then turn southwest onto Fort Wayne Avenue. From Fort Wayne Avenue, they can head west on St. Clair Street to West Street. Trucks can access I-65 north or I-70 west from West Street.
- St. Clair Street, from original APE west to West Street – Trucks heading south on College Avenue or southwest on Fort Wayne Avenue can turn west onto St. Clair Street to West Street. Trucks can access I-65 north or I-70 west from West Street.
- East Street, from original APE south to original APE – Trucks may also head south on East Street from 10th Street to the Washington Street interchange. Most of East Street is already within the original APE; however, this expansion would add the portion from approximately Vermont Street to North Street.
- Pennsylvania Street, south from original APE to Madison Avenue – Trucks could take Pennsylvania Street south to Madison Avenue to the I-70 interchange.
- Madison Avenue, from Pennsylvania Street to I-70 – Trucks could take Pennsylvania Street south to Madison Avenue to the I-70 interchange.

Identification of historic properties within the expanded APE is proposed to occur in a two-tiered approach.

Tier 1 - Identification efforts would involve a survey of the existing right-of-way for historic or unique features such as brick or stone streets, limestone curbs, stone walls or other potentially contributing features that could be affected by increased truck traffic. If any of these unusual features are identified within the APE, the identification would move to Tier 2. Historic bridges within the existing right-of-way would also be identified.

Tier 2 – If historic or unique features are identified in Tier 1, then a Qualified Professional (QP) will determine if these features are contributing to an NRHP-listed or NRHP-eligible historic district or property. Typically, these transportation-related features are not individually NRHP-listed or NRHP-eligible unless they contribute to a NRHP-listed or NRHP-eligible historic district or property.

The results of the historic property identification efforts following the two-tiered methodology will be provided to the SHPO and consulting parties for review and comment.

Consulting Party Comments and Responses

Attachment E includes comments and questions received from Consulting Parties responding to the September 19, 2017 Section 106 early coordination letter and October 6, 2017 Consulting Parties meeting. Responses to each comment are provided with the comment. Comments and responses are grouped by organization and the order they were received.

Consulting Parties Meeting/WebEx

We would like to invite you to participate in a Consulting Parties Meeting on January 26, 2018 at the Benjamin Harrison Presidential Site at 1230 N. Delaware Street, Indianapolis, Indiana 46202 from 9:00 a.m. to 11:00 a.m. Indianapolis time. Parking is free and non-permit along Delaware Street or in the small parking lot off 13th Street. You may participate in person or by WebEx and conference call using the information below. At this meeting, we will discuss historic properties within the APE, consulting party comment responses, traffic diversion and APE expansion methodology, and next steps in the Section 106 consultation process.

Click Here for WebEx: [Join WebEx meeting](#) or type:

<https://hntb.webex.com/hntb/j.php?MTID=m3e98e62c9e5f29bcb0e9930096934cd4>

Meeting number (access code): 749 132 825

Meeting password: KtXpm636

Join by phone

+1-415-655-0002 US Toll

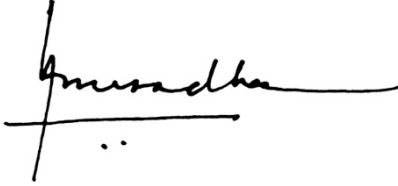
+1-855-797-9485 US Toll free

Please review the information and comment within 30 calendar days of receipt. For questions concerning specific project details, you may contact Kia Gillette of HNTB Corporation at 317-636-4682 or kgillette@hntb.com. All future responses regarding the proposed project should be forwarded to HNTB Corporation at the following address:

Kia Gillette
Environmental Project Manager
HNTB Corporation
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,

A handwritten signature in black ink, appearing to read "Anuradha", written over a horizontal line. There are two small dots below the line.

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Attachments:

- Attachment A – General Figures
- Attachment B – Consulting Parties List & Contact Information
- Attachment C – HPR Management Summary
- Attachment D – Traffic Diversion & APE Expansion Methodology & Maps
- Attachment E – Consulting Party Comments & Responses
- Attachment F – Existing Bridges Table & Maps
- Attachment G – Original APE Map & Photographs

Distribution List: IDNR-Division of Historic Preservation and Archaeology
Indiana Landmarks
National Park Service, Midwest Region
Historic Urban Neighborhoods of Indianapolis
Indianapolis Historic Preservation Commission
Indianapolis Department of Metropolitan Development
Indianapolis Department of Public Works
Old Northside Neighborhood Association
Benjamin Harrison Presidential Site
St. Joseph Historic Neighborhood Association
Chatham Arch Neighborhood Association
Lockerbie Square People's Club
Windsor Park Neighborhood Association
Holy Cross Neighborhood Association
Cottage Home Neighborhood Association
Cottage Home BOD
Mayor's Neighborhood Advocate, Area 10
NESCO Land Use
John Boner Neighborhood Centers
Fountain Square Neighborhood Association
Miami Tribe of Oklahoma