



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

September 28, 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 #2

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 (I-65/I-70 North Split 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.

Alternatives Screening Report

INDOT completed an Alternatives Screening Report for the I-65/I-70 North Split Project as part of the National Environmental Policy Act (NEPA) process. This Alternatives Screening Report is available for your review and comment at www.northsplit.com.

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 an updated list of the consulting parties with contact information, including email addresses, for processing the dual review submission (Attachment B).

Historic Property Report Addendum

INDOT completed a Historic Property Report (HPR) for the proposed I-65/I-70 North Split Interchange Project. The HPR was released and consulting parties notified of its availability on September 19, 2017. The Indiana State Historic Preservation Officer (SHPO) concurred with the findings in the report by letter dated February 8, 2018 (DHPA 21534). INDOT also completed an HPR Addendum for the project. This addendum does not change any of the findings of the original report. The HPR Addendum documents the identification and evaluation efforts for properties included in the Expanded Area of Potential Effects (Expanded APE) for this project, which is divided into 12 segments. This HPR addendum is independent of any alternative selected and does not mean that a specific build alternative has been selected.

The Expanded APE was discussed at a meeting with the SHPO on December 7, 2017, and at the January 26, 2018, Consulting Parties (CP) meeting. Traffic models indicated these 12 segments could see a meaningful temporary increase in truck traffic during the construction phase of the project if there were to be a full closure of the North Split interchange. Full closure of the interchange is anticipated to be a worst-case scenario for truck traffic diversion during construction. The 12 segments are:

1. Fall Creek Parkway Segment from 38th Street south to College Avenue
2. College Avenue Segment from Fall Creek Parkway south to original APE
3. West Street Segment from the I-65 interchange south to the I-70 interchange
4. Missouri Street Segment from West Street south to the I-70 interchange
5. Pennsylvania Street Segment south from original APE to Madison Avenue
6. Madison Avenue Segment from Pennsylvania Street to I-70
7. St. Clair Street Segment from original APE west to West Street
8. Fort Wayne Avenue Segment from original APE south to St. Clair Street
9. East Street Segment from original APE south to original APE
10. Washington Street Segment from Rural Street west to original APE
11. Rural Street Segment from the I-70 interchange south to Washington Street
12. Massachusetts Avenue Segment from original APE east to Rural Street

Identification of aboveground resources within the Expanded APE was completed using a two-step approach. Step 1 involved surveying the existing right-of-way of each segment as described above to identify historic or unique features, including brick or stone streets, limestone curbs, stone walls, historic bridges, and any other features that would contribute to a historic property, if present. These types of features, if present, could potentially be affected by heavy trucks diverted during construction. No improvements are planned for these segments at this time. Following the Step 1 survey, in Step 2, segments with any of the unique features noted above were reviewed to determine if the features are contributing to a National Register of Historic Places (NRHP)-listed or NRHP-eligible historic district or property.

The Step 1 survey identified three segments with one or more of the unique features outlined above: the College Avenue Segment, the Rural Street Segment, and the Massachusetts Avenue Segment. In Step 2, aboveground resources to which the identified unique features might contribute were identified and evaluated in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966, as amended, and the regulations implementing Section 106 (36 CFR Part 800).

The three aboveground resources that were examined within these three segments are: Marion County Bridge No. 1803F (IHSSI No. 098-296-00741) in the College Avenue Segment; Marion County Bridge No. 2514F over Pogue's Run in the Rural Street Segment; and the buildings adjoining brick pavement at Massachusetts Avenue and Valley Avenue in the Massachusetts Avenue Segment. The buildings adjoining the brick pavement at Massachusetts Avenue and Valley Avenue were determined to be not eligible for the NRHP. Marion County Bridge No. 1803F is a contributing resource in the Indianapolis Park & Boulevard System Historic District, and is listed in the Indiana Historic Bridge Inventory as historic and Select. Marion County Bridge No. 2514F is also a contributing resource in the Indianapolis Park & Boulevard System Historic District, and was also identified in the Indiana Historic Bridge Inventory as historic and Select. These two historic properties identified in the expanded APE may be affected by the temporary diversion of truck traffic during construction.

The HPR Addendum 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). You are invited to review this letter and the HPR Addendum and respond with comments on any historic resource impacts incurred as a result of this project. We also welcome your 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.

Consulting Party Comments and Responses

Attachment C includes comments and questions received from Consulting Parties from January 4, 2018 to September 6, 2018. Responses are provided with each comment. Comments and responses are grouped by organization and the order they were received. It excludes comments on the System-Level Analysis. System-Level Analysis comments and responses are included in Attachment D. System-Level Analysis comments were posted to the project website: www.northsplit.com.

Consulting Parties Meeting/WebEx

We would like to invite you to participate in a Consulting Parties Meeting on Wednesday October 17, 2018, at the Indiana Historical Society at 450 West Ohio Street, Indianapolis, Indiana 46202 from 5:30 p.m. to 7:30 p.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 or the gate will be open). 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 Expanded APE, the Alternatives Screening Report, and next steps in the Section 106 consultation process.

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

Meeting number (access code): 749 996 540

Meeting password: 933TTKat

Join by phone

[+1-415-655-0002](#) US Toll

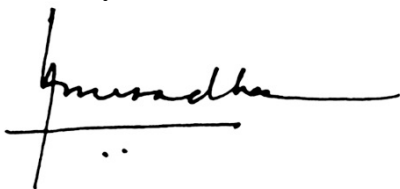
[+1-855-797-9485](#) US Toll free

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', with a horizontal line and two dots below it.

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Attachments:

- Attachment A – General Figures
- Attachment B – Consulting Parties List & Contact Information
- Attachment C – Consulting Party Comments & Responses
- Attachment D – Consulting Party Comments & Responses on System-Level Analysis

Distribution List:

Chad Slider, IDNR-Division of Historic Preservation and Archaeology
Marsh Davis, Indiana Landmarks
Mark Dollase, Indiana Landmarks
Chad Lethig, Indiana Landmarks & Historic Urban Neighborhoods of Indianapolis
Dr. Michele Curran, National Park Service, Midwest Region
Marjorie Kienle, Historic Urban Neighborhoods of Indianapolis
Garry Chilluffo, Historic Urban Neighborhoods of Indianapolis
Meg Purnsley, Indianapolis Historic Preservation Commission
Meredith Klekotka, Indianapolis Department of Metropolitan Development
Melody Park, Indianapolis Department of Public Works

Garry Elder, Old Northside Neighborhood Association
Nancy Inui, Old Northside Neighborhood Association
Travis Barnes, Old Northside Neighborhood Association
Hilary Barnes, Old Northside Neighborhood Association
Charles Hyde, Benjamin Harrison Presidential Site
Pete Haupers, St. Joseph Historic Neighborhood Association
David Pflugh, Chatham Arch Neighborhood Association
Jeffrey Christoffersen, Lockerbie Square People's Club
Jen Eamon, Windsor Park Neighborhood Association
Jen Higginbotham, Holy Cross Neighborhood Association
Pat Dubach, Holy Cross Neighborhood Association
Kelly Wensing, Holy Cross Neighborhood Association
Jason Rowley, Holy Cross Neighborhood Association
Crystal Rehder, Cottage Home Neighborhood Association
Jim Jessee, Cottage Home Neighborhood Association
Meg Storrow, Massachusetts Avenue Merchants Association
Ruth Morales, Mayor's Neighborhood Advocate, Area 10
Isaac Bamgbose, Hendricks Commercial Properties
David Hittle, NESCO Land Use
Jon Berg, John Boner Neighborhood Centers
Patricia and Charles Perrin, Property Owners
Desiree Calderella, Fountain Square Neighborhood Association
Andrew House, Fountain Square Neighborhood Association
Jordan Ryan, North Square Neighborhood Association
David Forsell, Keep Indianapolis Beautiful, Inc.
Joe Jarzen, Keep Indianapolis Beautiful, Inc.
Luke Leising, Property Owner
Mark Beebe, American Institute of Architects
Glenn Blackwood, Fletcher Place Neighborhood Association
Jim Lingenfelter, Southeast Neighborhood Land Use Committee
Josephine Rogers-Smith, Martindale Brightwood Neighborhood
Paul Knapp, Interstate Business Group
Betsy Merritt, National Trust for Historic Preservation
Sarah Stokely, Advisory Council on Historic Preservation
Sandy Cummings, Property Owner
Denise Halliburton, Old Near Westside/Ransom Place
Diane Hunter, Miami Tribe of Oklahoma

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Attachment A

General Figures

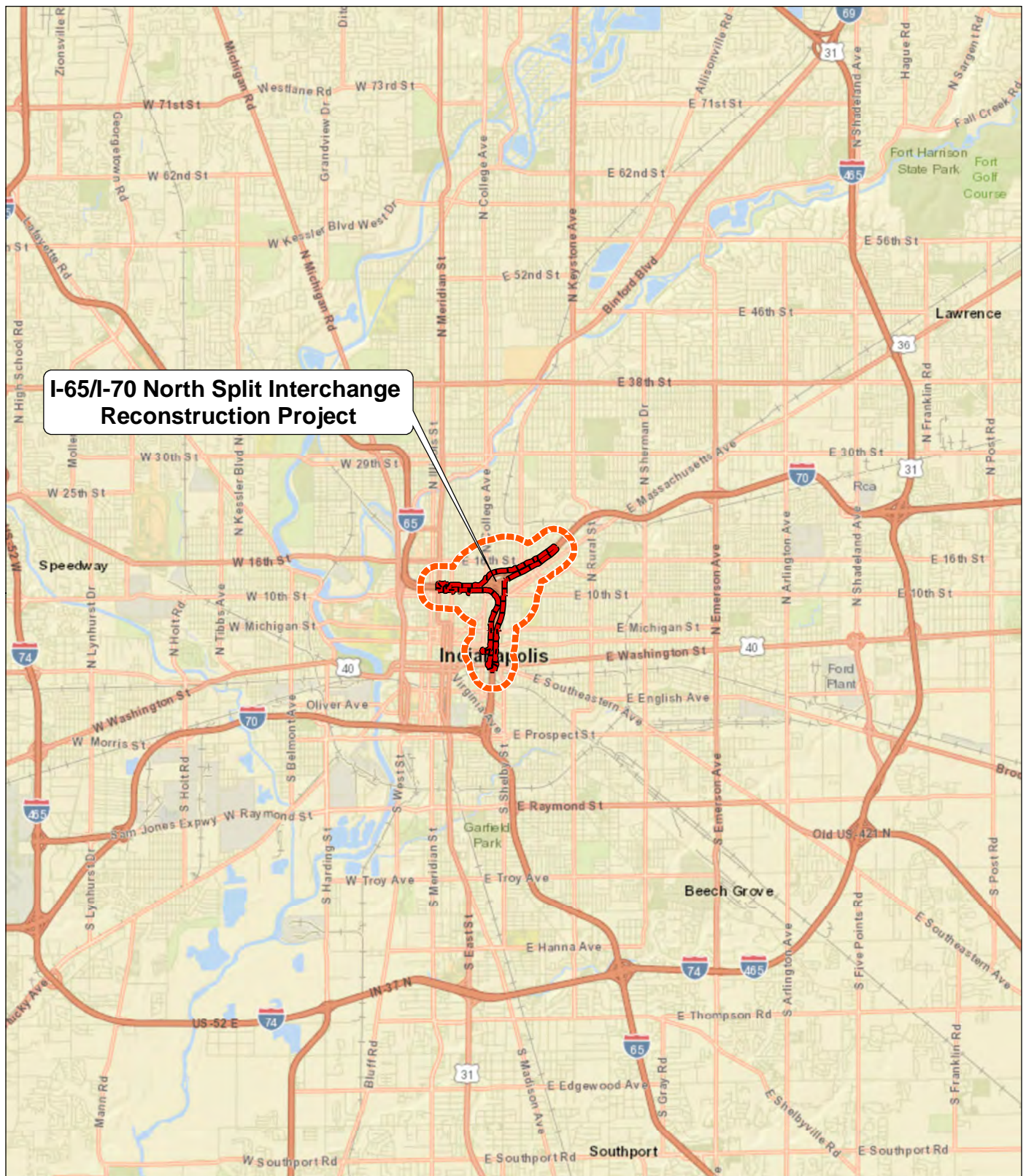
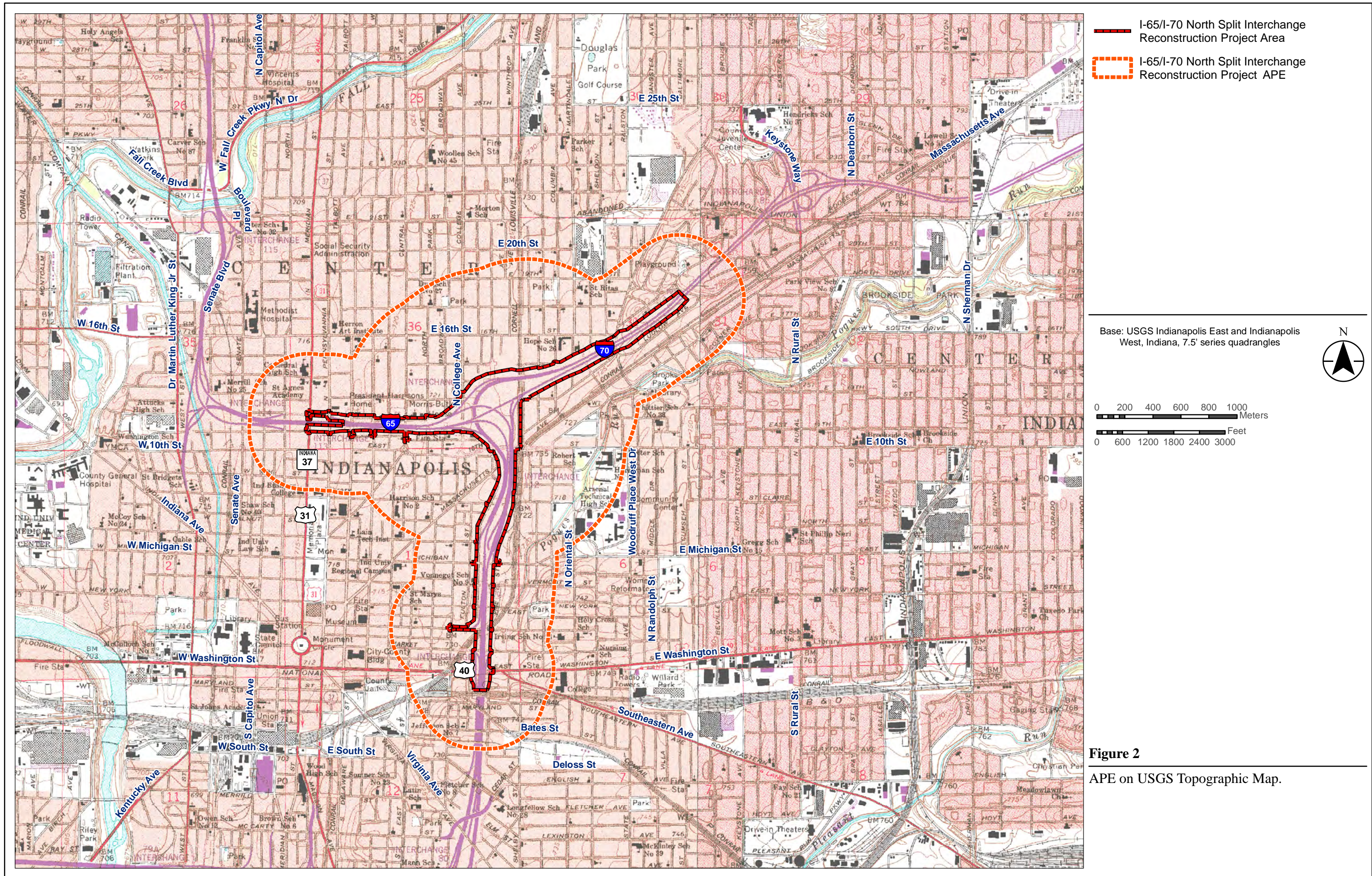


Figure 1

General Project Location Map.

Base: ESRI World Street Map



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Attachment B

**Consulting Parties List
& Contact Information**

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 1600808
Consulting Parties List (9/7/2018)

Organization	Contact Name	Title	E-Mail
IDNR-Division of Historic Preservation and Archaeology	Chad Slider	Deputy State Historic Preservation Officer	N/A
Indiana Landmarks	Mark Dollase	Vice President of Preservation Services	mdollase@indianalandmarks.org
Indiana Landmarks	Marsh Davis	President	mdavis@indianalandmarks.org
National Park Service, Midwest Region	Dr. Michele Curran		michele_curran@nps.gov
Historic Urban Neighborhoods of Indianapolis	Marjorie Kienle		mlkienle@indy.rr.com
Historic Urban Neighborhoods of Indianapolis/Indiana Landmarks	Chad Lethig	Secretary	clethig@indianalandmarks.org
Historic Urban Neighborhoods of Indianapolis/Indiana Landmarks	Garry Chilluffo		garry@chilluffo.com
Indianapolis Historic Preservation Commission	Chris Myers	Preservation Planner, Indianapolis Historic Preservation Commission/City of Indianapolis	Chris.Myers@indy.gov
Indianapolis Department of Metropolitan Development	Meredith Klekotka	Principal Planner	Meredith.Klekotka@indy.gov
Indianapolis Department of Public Works	Melody Park	Chief Engineer	Melody.Park@indy.gov
Old Northside Neighborhood Association	Nancy Inui	President	nsinui@ameritech.net
Old Northside Neighborhood Association	Travis Barnes		travis@hoteltangowhiskey.com
Benjamin Harrison Presidential Site	Charles A. Hyde	President and CEO	chyde@bhpsite.org
St. Joseph Historic Neighborhood Association	Pete Haupers	President	haupers3@gmail.com
Chatham Arch Neighborhood Association	David Pflugh	President	canaindy@gmail.com
Lockerbie Square People's Club	Marjorie Kienle		mlkienle@indy.rr.com
Windsor Park Neighborhood Association, Inc.	Jen Eamon	President	wearewindsorpark@gmail.com
Holy Cross Neighborhood Association	Jen Higginbotham		Jen_Higginbotham@yahoo.com
Holy Cross Neighborhood Association	Pat Dubach		pdubach@redev.net
Holy Cross Neighborhood Association	Kelly Wensing		kellywensing@gmail.com
Holy Cross Neighborhood Association	Jason Rowley		jrowley@hanson-inc.com

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 1600808
Consulting Parties List (9/7/2018)

Cottage Home Neighborhood Association	Crystal Rehder	President, Cottage Home Neighborhood Indianapolis	cottagehomeneighborhood@gmail.com
Cottage Home BOD	Jim Jessee		jamesjessee102@gmail.com
Mayor's Neighborhood Advocate, Area 10	Ruth Morales		ruth.morales@indy.gov
NESCO Land Use	David Hittle		davidhittle@gmail.com
Fountain Square Neighborhood Association	Desiree Calderella	President	fsna1835@gmail.com
John Boner Neighborhood Centers	Jon Berg	IndyEast Promise Zone Director	jberg@jbncenters.org
Miami Tribe of Oklahoma	Diane Hunter	THPO	dhunter@miamination.com
Indianapolis Historic Preservation Commission	Meg Purnsley	Administrator, Indianapolis Historic Preservation Commission/City of Indianapolis	Meg.Purnsley@indy.gov
Old Northside Neighborhood Association	Garry Elder	President	eldergarry@sbcglobal.net
Lockerbie Square People's Club	Jeffrey Christoffersen		jeff@thechristoffersens.com
Massachusetts Avenue Merchants Association	Meg Storrow		storrow@storrowkinsella.com
Hendricks Commerical Properties	Isaac Bamgbose	Vice President - Asset Management	Isacc.Bamgbose@hendricksgroup.net
Property Owner	Patricia and Charles Perrin		pperrin@indy.rr.com
North Square Neighborhood Association	Jordan Ryan		jordanblairryan@gmail.com
Keep Indianapolis Beautiful, Inc.	David Forsell	President	dforsell@kibi.org
Keep Indianapolis Beautiful, Inc.	Joe Jarzen	Vice President of Program Strategy	jjarzen@kibi.org
Property Owner	Luke Leising		luke@guidondesign.com
American Institute of Architects	Mark Beebe		mbeebe@lancerbeebe.com
Fletcher Place Neighborhood Association, Inc.	Glenn Blackwood		glennblackwood@gmail.com
Southeast Neighborhood Land Use Committee	Jim Lingenfelter		jimlingenfelter@five2fivedesign.com
Martindale Brightwood Neighborhood	Josephine Rogers-Smith	Executive Director	jrogers@mbcdc.org

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 1600808
Consulting Parties List (9/7/2018)

Fountain Square Neighborhood Association	Andrew House		Andrewmhouse@gmail.com
Interstate Business Group	Paul Knapp		pknapp@yandl.com
National Trust for Historic Preservation	Betsy Merritt	Deputy General Council	emeritt@savingplaces.org
Advisory Council on Historic Preservation	Sarah Stokely	Program Analyst	sstokely@achp.gov
St. Joseph Neighborhood Property Owner	Sandy Cummings		sandycummings2003@yahoo.com
Old Near Westside/Ransom Place	Denise Halliburton		d_halliburton@hotmail.com
Old Northside Neighborhood Association	Hilary Barnes		hitalyor09@gmail.com

Section 106 Update Memo #2

Attachment C

Consulting Party Comments & Responses



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

Table C.1: I-65/I-70 North Split Project (Des. Nos. 1592385 & 1600808) – Consulting Party Comments & Responses from January 4, 2018 to September 25, 2018 (Excludes System-Level Analysis Comments which are in Attachment D)

Note: Comments in italics have not yet received responses. Comments not in italics were responded to previously via email.

Comment	Response
Patricia Perrin – January 14, 2018	
My name is Patricia Perrin and my husband, Charles and I own the home at 1211 N Alabama Street. Could we please be added as a consulting party? I would like to attend the meetings on this project.	Mrs. Perrin and her husband were added as consulting parties on January 13, 2018.
North Square Neighborhood Association – Jordan Ryan – January 15, 2018	
I am writing to you on behalf of the North Square Neighborhood Association to request that NSNA be included as a consulting party in the review process for the I-65/I-70 project. North Square is the northwest section of what is generally known entirely as Fountain Square, but NSNA has our own separate city-recognized neighborhood association with resident-elected board members. Our boundaries are I-65/I-70 to the west; Virginia Avenue to the southwest; Woodlawn Avenue to the southeast; Shelby Street to the east; and Fletcher Avenue to the north. Our neighborhood boundaries are two blocks out of the designated APE for Phase I of the project, but we are concerned that if we are not included in Phase I of the discussions, particular decisions affecting the entire project may be determined before Phase II begins. Please let me know if we may send a representative to the next consulting parties meeting and meeting details.	Ms. Ryan was added as a consulting party on January 16, 2018.
North Square Neighborhood Association – Jordan Ryan – February 5, 2018	
Are you accepting comments from the second consulting parties meeting via email or do you prefer them to be mailed?	Yes, comments will be accepted via email.
North Square Neighborhood Association (NSNA) does not support INDOT's initial proposal for the I-65/I-70 North Split Interchange Reconstruction Project (Des. Nos. 1592385 & 1600808). NSNA supports the study of alternative proposals, an independent review, and full collaboration with the City of Indianapolis. NSNA requests that INDOT, the State of Indiana, and the Metropolitan Planning Organization work with the City of	INDOT has worked with and will continue to work with the City of Indianapolis and the Indianapolis Metropolitan Planning Organization during the North Split project. INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility

<p><i>Indianapolis to ensure that downtown residents and businesses are fully represented in the final plan for the future reconstruction of interstates I-65 and I-70, specifically in the downtown area. NSNA supports the exploration of alternative plans that expand upon INDOT's original vision and scope, as well as the use of creative funding tools and innovative partnerships and collaborations in order to enhance our quality of life as a downtown neighborhood that abuts the interstate on our western boundary.</i></p>	<p><i>needs, probable cost, and traffic impacts downtown and in nearby neighborhoods.</i></p> <p><i>The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential options. The options were not ranked and no specific system-level recommendation was made in the study.</i></p> <p><i>The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.</i></p> <ol style="list-style-type: none"> <i>1. No-Build (maintain existing configurations)</i> <i>2. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit*</i> <i>3. Upgrade existing Interstates for entire inner loop</i> <i>4. Depress downtown Interstates*</i> <i>5. Replace Interstates with at-grade boulevards*</i> <i>6. Construct at-grade boulevards + Interstates in tunnels*</i> <i>7. Construct new Interstate link – new I-65 west leg</i> <p><i>*Suggested by various community groups</i></p> <p><i>The results of the System-Level Analysis were published in a report released on May 3, 2018, and were presented to the CAC, Consulting Parties, and several local groups during May and early June. A public open house was held to present the results of the System-Level Analysis on May 23, 2018.</i></p> <p><i>At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the National Environmental Policy Act (NEPA) process. Project-level alternatives for the Environmental Assessment (EA) would be developed that best meet the project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.</i></p> <p><i>It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split</i></p>
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	<p><i>project and would take many years to plan, study, design, and implement. The current condition of the North Split interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p>
Hendricks Commercial Properties – Michael Rabinowitch/Isaac Bamgbose – January 20, 2018	
<p>I am an attorney representing Hendricks Commercial Properties. Hendricks is the owner of the former Coca Cola Bottling Plant in the 800 block of Massachusetts Ave., which is in close proximity to the proposed project site. Hendricks is undertaking a major redevelopment of the site, including restoration, at great expense, of the existing historic buildings on the site. Naturally, Hendricks has great interest in the I-65/70 interchange project and would like to be added as a consulting party and copied on correspondence and reports and receive notice of meetings. I would ask that you add Hendricks' local representative Isaac Bamgbose as the contact person for Hendricks. Isaac is copied here.</p>	<p>Mr. Bamgbose was added as a consulting party on January 22, 2018.</p>
Keep Indianapolis Beautiful, Inc – David Forsell – January 25, 2018	
<p>Keep Indianapolis Beautiful would like to register as a consulting party for the Split project. We have invested hundreds of thousands of dollars in this part of interstate right of way with trees and art; are working toward a more just and healthy community; and, its beauty and livability. We hope we can participate in tomorrow's consultant's meeting at Benjamin Harrison Home. Thanks so much for your consideration.</p>	<p>Keep Indianapolis Beautiful was added as a consulting party on January 22, 2018. They also participated in the Consulting Party meeting on January 26, 2018 at the Benjamin Harrison Home.</p>
Keep Indianapolis Beautiful, Inc. – Joe Jarzen – January 31, 2018	
<p>I appreciate your adding us to the consulting parties list. Thank you and we look forward to helping through this process. We should be able to return comments to you by February 9, though we were wondering if you had an outline of the alternative routes that you specified last Friday about proposed alternative traffic patterns.</p> <p>I'm glad to hear that the information that Mark gave you about the trees alongside the highway was helpful. After my question on Friday, another woman asked further about any NEPA review in connection with the air quality issues that were coming up. I just want to make sure I understand correctly that much of that process is already passed, but issue that might be raised through the Section 106 process would inform NEPA? Is that correct, and if</p>	<p>Thanks for participating in the meeting.</p> <p>I'm not sure I understand what you mean by an outline of the alternative routes that you specified last Friday about proposed alternative traffic patterns. Do you mean a list of other alternatives that we are investigating?</p> <p>Just to clarify, we are still early in the NEPA process, so much of it really hasn't passed. There are still going to be a number of opportunities for the public and agencies to comment on the project, even outside of the Section 106 process. I would recommend including any comments you feel are relevant in your comments now. They will still be considered and it definitely won't hurt anything.</p>

<p>so, we might be advised to include that in our comments about how trees not only provide aesthetic and cultural impact to the historic districts, but also an environmental benefit to the pollutants in the air cause by traffic on the highway.</p> <p>Another question I thought of after the meeting was that if our next Consulting Parties meeting will focus on alternative plans, and one of those plans was the one that has been submitted about a boulevard system type approach, would a meeting among the groups that submitted that proposal and INDOT to discuss that a bit further prior to the meeting be beneficial? I think it might help quite a bit if we could get together and explore that and provide more detail to prepare for the consulting party meeting. If there is a way KIB can help convene that to support this process as best as possible, perhaps that is something we can do.</p>	<p>Regarding your third point, we appreciate the offer and certainly want to keep working with you on this. We are discussing something similar with INDOT and FHWA right now. I'll let you know what is decided.</p>
<p>Thanks for the response and further clarity Kia. Regarding the traffic routes, I was wondering about the list that you read off last week about routes being thought of to reroute traffic. I realize these are all very preliminary suggestions at this point.</p> <p>That's good to have better understanding about the NEPA process, and we will plan on providing that input now as well. Glad to hear that you and FHWA are exploring how to engage further on the alternative ideas. We want to be helpful where we can and ensure that other proposals are seriously considered as well. Let me know how we can help.</p>	<p>Ok. Those are included in the letter that I forwarded. I've attached it again for convenience. The letter attachments are too large to email, but they include a map and a longer description of the methodology used to determine those routes. There is a link in the letter that will take you INDOT's IN SCOPE website where you can access the letter attachments and Historic Property Report. Please let me know if you have any trouble accessing them.</p> <p>Just to clarify, we are not proposing to reroute traffic on those streets or make them an official detour. We think they are streets that could see increased truck traffic if the North Split interchange is closed.</p>
<p>Perfect, that helps to know about the attachments. I think that's what I was looking for and I missed the link that you mentioned. I'll look more closely!</p> <p>Yes, I appreciate your trying to be very clear with all this. I understand that these won't be an official detour.</p>	<p>Thank you for your comment. No response required.</p>
<p>Keep Indianapolis Beautiful, Inc. – Joe Jarzen – February 8, 2018</p>	
<p>I wanted to let you know that we are working on our comments to include for the Section 106 review for this project. I realize they are due tomorrow but recall you mentioning in a previous email that perhaps additional time may be allowed if needed. I wanted to confirm if that was the case so that we might have time to allow some specific people on our team to review the document. I wanted to check on this deadline and see what extension of time allowance there might be, if there is any.</p> <p>Also, is there any update with your conversations with FHWA regarding meeting to discuss other options as noted in a previous email?</p>	<p>Yes, you can have additional time. Would it be possible to provide them by next Friday, 2/23?</p> <p>And yes, we do have an update. In the near future, we would like to invite 4-5 of the community group representatives to a technical working meeting to make sure we understand the alternatives they are proposing. We view this as a small group working meeting, and not a large public meeting. We will have larger public meetings in the future. However, we are not sure who to reach out to for the invitation. Do you have any thoughts on who to invite or at least who we should initially contact?</p>
<p>Thank you so much Kia. I appreciate your understanding. We are actually going through a training today too that</p>	<p>We were initially thinking of the technical people in order to try and flush out some of the details of the concepts in the</p>

<p>might help provide some additional information for us to share and make our comments a bit more accurate and informative.</p> <p>That's so good to hear that you are seeking a smaller group of community representatives. Are you thinking mostly residents or maybe a mix of residents with some of the folks leading the alternative plan ideas. I definitely think Marsh Davis from Indiana Landmarks would be a good one to include as he spans both, as a property owner and an expert in the work. Let me know and I would be happy to brainstorm some folks for you.</p>	<p>presentations. However, if there are some residents that could also be helpful in that regard I think it would be ok too.</p> <p>Yes, if you can think of anyone and provide any suggestions that would be great.</p>
Keep Indianapolis Beautiful, Inc. – Joe Jarzen – February 9, 2018	
<p>Firstly, thank you so much for the extra time to complete these comments. Please find our comments attached.</p> <p>As for any advice on key representatives/contacts who might be helpful in a meeting to review other options with you, INDOT and FHWA, I believe Marsh Davis of Indiana Landmarks and Kevin Osburn of REA would be good.</p> <p>As you probably know, they are both part of this initial group who worked on one option. Of course, KIB would surely be interested to participate as well.</p> <p>Meg Storrow and John Kinsella were also part of that. Marjorie Kienle is a past president of HUNI, and Garry Chilluffo is current president. If you're looking for a key access point to neighbors, they would be good to include.</p> <p>That group gets you a good selection representing the historic, environmental, landscape design, design and resident perspectives. Keep me posted and let me know if I can help.</p>	<p>Thank you for the information. A meeting with the Rethink Coalition and the North Split project team was held on March 16, 2018 to discuss the project.</p>
Keep Indianapolis Beautiful, Inc. – Joe Jarzen/David Forsell – February 13, 2018	
<p><i>On behalf of Keep Indianapolis Beautiful, Inc. (KIB), please accept the following comments to be included for consideration in review of the Indiana Department of Transportation (INDOT) project with funding from the Federal Highway Administration (FHWA) proposing to proceed with the I-65/I-70 North Split Interchange Reconstruction Project in the City of Indianapolis, Marion County (Des. Number (Nos.)1592385 & 1600808).</i></p> <p><i>Noting current project design, KIB believes there are other reasonable options to consider that would meet the broad goals of improving current infrastructure conditions, provide a sustainable solution to traffic needs through and around Indianapolis, improve quality of life for the City and its neighborhoods adjacent to the interstate, which include but are not limited to economic investment opportunities and improved environmental impacts. KIB wishes to provide support to the State, City</i></p>	<p><i>INDOT has worked with and will continue to work with the City of Indianapolis and the Indianapolis Metropolitan Planning Organization during the North Split project.</i></p> <p><i>INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility needs, probable cost, and traffic impacts downtown and in nearby neighborhoods.</i></p> <p><i>The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential</i></p>

and other stakeholders to explore options that may continue to build Indianapolis as a leader in design and improving its environment.

By exploring an array of options to this project, KIB believes that the project can minimize an adverse effect to not just the National Register districts adjacent to the interstate, but also the environmental investments made within the INDOT right of way, and throughout the current area of potential effect.

An adverse effect, as defined by the Advisory Council on Historic Preservation (ACHP), is when a project may alter characteristics that qualify a specific property for inclusion on the National Register by diminishing its integrity. Adverse effects can be direct or indirect, and among many considerations, can include the change in the character of the property's setting, or introduction of incompatible visual, atmospheric or audible elements.

KIB is concerned that based on a current option of expanding the width of interstate through downtown, a sizeable number of trees and other projects would be negatively impacted, therefore altering the experience and character of the National Register listed historic districts adjacent to the interstate. The removal of a growing tree canopy impacts the aesthetic look of the neighborhoods by bringing the concrete and impervious surface much closer to the historic districts without the natural barrier. Large tree canopy is prevalent throughout these neighborhoods and these trees provide a continuance of that character where the neighborhood meets the interstate.

Moreover, removing this natural barrier also significantly lessens the annual benefits of carbon sequestration and other greenhouse gas mitigation, decreases storm water interception and noise reduction. National studies prove the positive impacts of trees. The Green Heart Project by the University of Louisville (<https://louisville.edu/greenheart>) recently studied the impact of large trees upon a school along a highly traveled street. Results proved the trees provided significant benefits on air quality and health of students at the school. It is critical to consider what level of traffic count and proximity to trees that can mitigate particulate matter in this project to have as best a result as possible.

Considering how a project might impact a property's setting, visually and atmospherically, it becomes clearer how a widening of the interstate might fit the ACHP's definition of an adverse effect. There is still substantial area to plant more, and opportunities to consider how alternative plans can meet transportation

options. The options were not ranked and no specific system-level recommendation was made in the study.

The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.

- 1. No-Build (maintain existing configurations)*
- 2. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit**
- 3. Upgrade existing Interstates for entire inner loop*
- 4. Depress downtown Interstates**
- 5. Replace Interstates with at-grade boulevards**
- 6. Construct at-grade boulevards + Interstates in tunnels**
- 7. Construct new Interstate link – new I-65 west leg*

**Suggested by various community groups*

The results of the System-Level Analysis were published in a report released on May 3, 2018, and were presented to the CAC, Consulting Parties, and several local groups during May and early June. A public open house was held to present the results of the System-Level Analysis on May 23, 2018.

At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the NEPA process. Project-level alternatives for the EA would be developed that best meet the project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.

It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split project and would take many years to plan, study, design, and implement. The current condition of the North Split interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.

An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while

<p><i>needs while protecting and increasing the City's tree canopy.</i></p> <p><i>Immediately adjacent to the project site the following investments were made by KIB. The option of widening the interstate will negatively impact these by removing the deliverables and erasing the time investment made to complete them. Attached is a map illustrating this investment. Note that the value of the following projects immediately adjacent to the interstate totals \$1,055,113 (including cost for planting and maintaining trees, and preparation and creation of 11 murals).</i></p> <p>1) Tree Plantings: <i>Between two primary tree planting projects within the past 10 years, Davidson and the Emerson Ave interchange, KIB planted 1,225 1-2" caliper trees. Trees planted in 2007 along Davidson Ave. are now starting to reach a caliper and height that is having clear environmental and aesthetic impact. Growing taller than the surface elevation of the interstate, they will continue to increase their impact if allowed to continue to thrive. KIB is prepared to provide additional detail about this impact using iTree but would need additional time for that.</i></p> <p style="padding-left: 40px;"><i>a. Tree plantings within the immediate area impacted that count toward the 1,225 include: [list of tree planting locations]</i></p> <p>2) Youth Employment: <i>KIB employs approximately 80 high school students from around the County each year to water and maintain approximately 5,000 trees each week. The trees along Davidson and Emerson were both watered weekly for three consecutive years to ensure survivability.</i></p> <p>3) Murals: <i>11 underpasses (Alabama St., Central Ave., College Ave., two along the Monon Trail, 10th St., St. Clair St., Michigan St., Vermont St., New York St., and Washington St.) were each power washed, primed, painted and protected by local and national renowned artists who engaged input from each neighborhood to create a more pleasing and safe corridor that connects each of these neighborhoods.</i></p> <p>4) Volunteers: <i>KIB completes its projects with the support of corporate and local volunteers. Planting one tree usually requires one volunteer, and murals usually average approximately 30 volunteers each. These projects required over \$112,000 in volunteer time and investment, based on Independent Sector value of hourly rate of volunteers. KIB projects that would be impacted due to their location within the area of potential effect include the following.</i></p> <p>1) Tree Plantings <i>(Table shows number of trees and</i></p>	<p><i>minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p> <p><i>Effects to historic properties will be determined as part of the Section 106 consultation with the State Historic Preservation Officer (SHPO) and consulting parties once more information on the preferred alternative is available.</i></p> <p><i>Opportunities for landscaping, tree plantings and other aesthetic treatments are anticipated as part of the project.</i></p> <p><i>Impacts to the trees within the existing INDOT right-of-way are not currently known. Impacts to bridge murals within the project area are possible. Impacts to the listed GreenSpaces, GreenKids area, Parks, Medians, and Gateways are not anticipated.</i></p>
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project site. Accounts for an additional 1,774 trees to the ones listed above):

2) GreenSpaces (These are pocket parks, gateways and community gardens that are maintained by a local project partner and include native plant and tree installations, public art and pathways, raised garden beds and other hardscape elements that create place and provide environmental and social benefits.)

- a. Athenaeum Raingarden and Pocket Park, 401 E. Michigan St.
- b. St. Mary, 317 N. New Jersey St.
- c. Fletcher Park, 1200 N. Arsenal Ave.
- d. Windsor Park Gateway, 1200 N. Arsenal Park
- e. 10th and Brookside Garden, 1100 E. Brookside Ave.
- f. 10th and Monon Median, 1100 E. 10th St.
- g. Fletcher Gateway, 717 Lexington Ave
- h. Merrill St., 598 Virginia Ave.
- i. Ransom Place, 706 W. Saint Clair St.
- j. Harrison Arts, 1505 N. Delaware St.
- k. Cottage Home Community Garden 758 N. Highland Ave and Pocket Park 504 Dorman St.
- l. Progress House, 201 Shelby St.
- m. Second Helpings, 1121 Southeastern Ave.
- n. Washington St/Southeastern Ave. Gateway, 921 E. Washington St.
- o. Felege Hiywot Community Garden 1642 Sheldon St and Pocket Park 1907 Caroline Ave.
- p. Zion Hill Helping Hands, 1610 E. 19th St.
- q. Living Well, 2415 N. Rural St.

3) GreenKids (These are spaces created in conjunction with the school community that bring students outside to learn about nature or have a unique setting for class. Spaces include native plant and tree installations, public art and pathways, raised garden beds and other hardscape elements that create place and provide environmental and social benefits.)

- a. CFI2, 725 N. New Jersey St.

4) Parks, Medians and Gateways (These are public spaces that KIB provides contracted support to the City to ensure they are planted with native plants and trees and are maintained throughout the year.)

- a. Cole-Noble Historic District, E. Market St between East St. and College Ave.
- b. Martin Luther King Memorial Park

5) Murals (In addition to the 11 Vibrant Corridor murals completed in partnership with INDOT, this

<p><i>mural is within the APE and provides similar benefits of safety and creating place.)</i></p> <p><i>a. Shelby St. Mural under CSX Rail south of Shelby St/Southeastern Ave intersection</i></p> <p><i>KIB was founded in 1976 and is the largest most comprehensive affiliate of Keep America Beautiful. KIB is a private nonprofit organization with a mission to engage diverse communities to create vibrant public places, helping people and nature thrive. Its work spans community engagement through programs focused on litter mitigation, increasing the tree canopy, creating with local neighborhoods natural and artistically designed places rooted in community, supporting habitat restoration throughout the City and providing meaningful opportunities for youth development from elementary school through college. KIB hopes to clean our air and water by planting 30,000 trees by 2025, support a more biodiverse environment by restoring 100 acres of landscapes by 2020 and inspire 100,000 people to care for the environment by 2022.</i></p> <p><i>Considering sensitive options that would enhance travel through downtown Indianapolis, KIB feels this project can accomplish both transportation and neighborhood quality of life goals, and be an example to other cities facing these similar challenges. KIB has already invested significantly within the currently defined area of potential effect, and supports the exploration of opportunities that increase the tree canopy, plant more native plants and engage neighborhoods in the process of doing so. KIB looks forward to working with INDOT, the City and other stakeholders to explore options that would not adversely impact the resources in the neighborhoods.</i></p>	
<p>Keep Indianapolis Beautiful, Inc – Joe Jarzen – February 16, 2018</p>	
<p>I just wanted to double check that you received our Section 106 comments this past Tuesday. I also realized that I failed to include the map of our projects that I reference. It is similar to the one you received from Mark Adler earlier on, but different in that it includes updated numbers on our investments. I've attached that for your records.</p> <p>Also, I suggested some names for the meeting you are exploring to convene. Hopefully that is helpful, please keep me posted on that progress and if there is anything I can do to help further.</p>	<p>Yes, thank you for sending your comments. I did receive them and they will be included in the project record. Thanks for sending the updated map as well.</p> <p>Also, thank you for sending the list of names. I am going to send an email following this one to those individuals to see if they would be interested in meeting to discuss the alternatives.</p>
<p>Keep Indianapolis Beautiful, Inc – Joe Jarzen – May 23, 2018</p>	

<p>Thank you for your time earlier this week providing more information during the CAC and Section 106 Consulting Party meetings. After the 106 meeting, you suggested that there might be interest to have KIB provide additional input on the process to develop the options for the North Split project. We are all providing feedback for that work, and I'm certain people will be anxious to see those options later this summer/early autumn.</p> <p>I wanted to follow-up on that conversation to see if there were actual next steps that we should be aware of to plan for?</p>	<p>Please see response provided by email on August 8 to comment below.</p>
Keep Indianapolis Beautiful, Inc – Joe Jarzen – July 30, 2018	
<p>I trust all is well. Sometime ago, I emailed offering any assistance you might need as your team works through the next stage of the North Split Project. Specifically, I believe we are in the stage where you are working up options that might work for the project and preparing that for Section 106 Review and the NEPA process. I wondered if there was an update you could share, or moreso, is there a way that KIB can provide input/insight into the work? We feel we can help add to the conversation to help make this successful, but want to be helpful through each step of the process.</p>	<p>Thank you for reaching out! I appreciate your willingness to help as we work through the North Split project. You are correct – we are right in the process of developing options for the project under NEPA and Section 106. The alternatives we are developing cover a broad range, from the standard No Build through various types of rehabilitation/reconstruction of the infrastructure. We hope to have something to share with the public in the next 1-2 months. Please note this will not be a final design, rather preliminary information on alternatives. There will still be opportunity to refine alternatives after their initial release to the public.</p> <p>We do believe KIB will be able to provide valuable input and insight on this project. When the options are completed, we will roll them out for public input. Once the direction is determined, we expect there will be opportunities to implement principals your organization advocates for. Your continued involvement on the CAC is the “frontline,” so to speak. We will reach out to you after the alternatives have been released to set up a meeting to discuss further.</p>
Keep Indianapolis Beautiful, Inc – Joe Jarzen – August 8, 2018	
<p>This is good to hear. Thank you for your reply. I appreciate the clarity on when you think the appropriate time for KIB input might be. We will certainly remain involved with the CAC and appreciate any opportunity to provide more insight into how a favored alternative by all parties might be improved to meet our goals, and hopefully the goals of the community as well. I look forward to hearing more and seeing the designs.</p>	<p>No response required.</p>
Historic Urban Neighborhoods of Indianapolis – Marjorie Kienle – January 25, 2018	
<p><i>Indianapolis, Indiana January 25, 2018 The Historic Urban Neighborhoods of Indianapolis (HUNI) urges the City of Indianapolis, State of Indiana, and Metropolitan Planning Organization to work together on a policy directive to shape future investments in the interstate system through downtown. HUNI is attending the INDOT Consulting Party meeting on Friday, January 26 at 9 AM at the Benjamin Harrison Presidential Site to make this request and ask that it be included in the report of this</i></p>	<p><i>INDOT has worked with and will continue to work with the City of Indianapolis and the Indianapolis Metropolitan Planning Organization during the North Split project.</i></p> <p><i>INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility needs, probable cost, and traffic impacts downtown and in</i></p>

meeting. HUNI urges INDOT to leverage its funds with other creative funding tools to achieve positive change that advances downtown vibrancy and its quality of life. Our intention is not to be an adversary to the existing process, but rather to facilitate a creative solution that meets INDOT's objectives, accelerates a bold vision for a world-class City, and maintains Indianapolis as the primary economic generator for the State of Indiana.

HUNI is seeking support for development of technically and economically feasible alternatives to the INDOT plan that more holistically address community development and quality of life opportunities. Those include economic development, environmental and social justice considerations, in addition to traffic management (in conjunction with mass transit, bike trails, etc.) But, rather than simply oppose this project, we view this as an opportunity to reshape downtown Indianapolis for the next half-century. Our vision reimagines the spatial and functional relationships of downtown Indianapolis to the region and the state as a whole. INDOT is on a fast track towards seeking design-build proposals for the first phase of the overall project, the north split of I-65/I-70, in late 2018/early 2019, per recently revealed documents.

The current plan is an archaic, 1960s-era model of transportation planning. The impact on Downtown caused by the project's widened bridges, added lanes and tall retaining walls will be devastating. The project will even further separate Downtown from its adjoining districts and historic neighborhoods that had been so impacted by the original interstate configuration fifty years ago. Some of those neighborhoods have only recently recovered due to the heroic efforts of countless committed stakeholders, though they are still impacted by proximity to the raised interstate facility. Other neighborhoods have never fully recovered. The expanded facility will exacerbate those environmental impacts on air quality and noise by closer proximity, increased traffic volumes and the proposed removal of existing landscaped berms along some sections.

This very large investment to repair outdated infrastructure is intended to enhance mobility and safety, which are admirable objectives. Yet even INDOT's report, based on questionable traffic projections, projects traffic demand will exceed capacity in 20 years. It will have a long-term adverse impact to the form and function of the city, its residents, and its businesses for the next 50 years (its projected life-span).

HUNI's broad goal is to leverage this very large federal and state investment into a new paradigm for

nearby neighborhoods.

The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential options. The options were not ranked and no specific system-level recommendation was made in the study.

The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.

- 1. No-Build (maintain existing configurations)*
- 2. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit**
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**Suggested by various community groups*

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At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the NEPA process. Project-level alternatives for the EA would be developed that best meet the project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.

It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split project and would take many years to plan, study, design, and implement. The current condition of the North Split

<p><i>transportation infrastructure within a vibrant community and region. The scale of this investment has a potential impact equal to or greater than the city-defining Indianapolis Park and Boulevard system of the early 20th century. We view this as an opportunity to establish a new grass-roots driven policy partnership with the City, the Regional Planning Agency and the State.</i></p>	<p><i>interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p>
Historic Urban Neighborhoods of Indianapolis – Garry Chilluffo – January 27, 2018	
<p>Very good meeting yesterday. I thought it was productive, great information and thoughtful commentary.</p> <p>I didn't get a chance to come up afterwards and introduce myself because I was talking with Seth out in the hall and there were a bunch of people talking with you up front.</p> <p>I would like to be added in with Marjorie as a consulting party for HUNI. As a community group, we represent a large footprint of downtown.</p> <p>I am familiar with this process as I was a consulting party (St Joe) for the Red Line. Marjorie represents us well, and will mostly attend, but as president of HUNI, I feel the need to be in the loop. I look forward to the continued dialog and as this process unfolds.</p>	<p>Mr. Chilluffo was added as a consulting party on January 30, 2018.</p>
Historic Urban Neighborhoods of Indianapolis – Garry Chilluffo – February 9, 2018	
<p>I'd like to take you up on your offer of an extension of time on the comment period. I have a rough draft. I'd like to clean it up a little more. And I have a meeting this afternoon, so I've run out of time.</p> <p>I can send it late today (after 5) or over weekend for Monday morning.</p> <p>If that's acceptable, thank you!</p>	<p>Not a problem. If you can send it by next Friday, that is fine.</p>
Historic Urban Neighborhoods of Indianapolis – Garry Chilluffo – February 12, 2018	
<p><i>Related to the 106 Review, the project was characterized as having no impact on the historic neighborhoods. As an overall comment, I find all neighborhoods will be negatively impacted by the expansion of the interstate. It will precisely impact property values.</i></p> <p><i>While we understand and support that our 50-year old interstate system is crumbling and needs to be addressed, community partners, which include residents, businesses and organizations, are suggesting a more thoughtful assessment of the reconstruction of the North Split. This is an opportunity to think Big and to the future of all</i></p>	<p><i>Effects to historic properties have not yet been determined. They will be determined as part of the Section 106 consultation with the State Historic Preservation Officer (SHPO) and consulting parties once more information on the preferred alternative is available.</i></p> <p><i>INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility needs, probable cost, and traffic impacts downtown and in</i></p>

<p><i>modes of transportation. Adding lanes and widening the interstate to simply move traffic should not be our only focus. We must look at the environmental effects beyond the interstate boundaries. We must be sensitive to the human environment, and the business environment. The viability of our City depends upon how we address economic development and our transit connectivity.</i></p> <p><i>It's taken 50 years for neighborhoods to recover from the interstate construction of the 60s. Downtown is vibrant and full of life. It's a walkable, livable community. The reconstruction of the North Split requires a sensitive interpretation. The population growth of downtown would dictate that we look at the livability factor. For that reason, we request a 4F Review.</i></p> <p><i>If we expect to attract jobs and talent to Indianapolis, we must look at the quality of life aspects of our neighborhoods. Community partners are asking that we Rethink how we will move traffic through downtown, and how neighborhoods can coexist with a forward-thinking redesign of our interstate system.</i></p>	<p><i>nearby neighborhoods.</i></p> <p><i>The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential options. The options were not ranked and no specific system-level recommendation was made in the study.</i></p> <p><i>The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.</i></p> <ol style="list-style-type: none"> <i>1. No-Build (maintain existing configurations)</i> <i>2. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit*</i> <i>3. Upgrade existing Interstates for entire inner loop</i> <i>4. Depress downtown Interstates*</i> <i>5. Replace Interstates with at-grade boulevards*</i> <i>6. Construct at-grade boulevards + Interstates in tunnels*</i> <i>7. Construct new Interstate link – new I-65 west leg</i> <p><i>*Suggested by various community groups</i></p> <p><i>The results of the System-Level Analysis were published in a report released on May 3, 2018, and were presented to the CAC, Consulting Parties, and several local groups during May and early June. A public open house was held to present the results of the System-Level Analysis on May 23, 2018.</i></p> <p><i>At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the NEPA process. Project-level alternatives for the EA would be developed that best meet the project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.</i></p> <p><i>It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split project and would take many years to plan, study, design, and implement. The current condition of the North Split</i></p>
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	<p><i>interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p> <p><i>A Section 4(f) evaluation will be completed if FHWA determines it is required.</i></p>
Historic Urban Neighborhoods of Indianapolis – Garry Chilluffo – February 16, 2018	
I thought I'd better get this to you tonight since I'll be gone most of tomorrow.	Thank you for sending these comments. I just wanted to let you know that we received them and they will be included in the project record.
Thanks for adding this in to the comments record.	
Luke Leising – January 26, 2018	
I would like to request to be a consulting party to the north split upgrades. I own 1221 n Penn that does contribute to the historic character of the neighborhood.	Mr. Leising was added as a consulting party on January 30, 2018.
Luke Leising – January 31, 2018	
<p><i>My comment is that the acknowledged direct impacts of historic properties should require a full Environmental Impact Statement (EIS) and not just a shorted environmental Assessment (EA). For example the Ben. Harrison home is proposed to have a vertical retaining wall and likely a sound barrier wall built within feet of its property that would be approx. 20' tall. These changes will have direct impact to the historic view sheds of this property and many of the neighborhoods effected. Additional lighting would directly impact the property not to mention sound and vibration.</i></p> <p><i>A more thorough process should be followed to develop solutions that are the least impactful. It appears from the comments made that the base design options are already developed. One of the answers provided was that traffic entry points to the highway would not be changed. This appears to be a foregone conclusion that the final solution is already in development. A more complete EIS would provide a format to develop the best solution for the community.</i></p>	<p><i>INDOT and FHWA are following the NEPA process. FHWA has determined an EA is the appropriate level of analysis for this project. The purpose of an EA is to determine if a project will have significant impacts on the environment. If not, a Finding of No Significant Impact (FONSI) will be issued by FHWA, which will mark the end of the NEPA process and document the decision. If significant impacts are identified during the EA process, additional studies or an Environmental Impact Statement (EIS) may be required.</i></p> <p><i>Effects to historic properties have not yet been determined. They will be determined as part of the Section 106 consultation with the SHPO and consulting parties once more information on the preferred alternative is available.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p>
Indiana Department of Natural Resources – Chad Slider – January 30, 2018	
<i>The Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology ("DHPA"), which also serves as the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO"), is in receipt of your letter dated January 8, 2018, transmitting your</i>	<i>Thank you for the information. Future correspondence regarding the dual review of the project will refer to DHPA No. 21534.</i>

<p><i>proposal for a dual review, pursuant to 312 Indiana Administrative (“IAC”)20-4-11.5, of the aforementioned project in Marion County, Indiana.</i></p> <p><i>The DHPA will review the information submitted under Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C 306108), implementing regulations at 36 C.F.R. Part 800, and relevant FHWA-Indiana SHPO programmatic agreements, as well as Indiana Code 14-21-1-18, 312 IAC 20-4. By copy of this letter, the division is providing notification of the commencement of the dual review to interested person and members of the Indiana Historic Preservation Review Board. Notice of the commencement will also be posted on the division’s website (www.in.gov/dnr/historic/7440.htm).</i></p> <p><i>If you have questions regarding our dual review of this project, please contact the DHPA. Questions about archaeological issues should be directed to Mitchell K. Zoll at (317) 232-3492 or mzoll@dnr.IN.gov. Questions about historic buildings or structures pertaining to this review should be directed to Chad Slide (317) 234-5366 or cslider@dnr.IN.gov.</i></p> <p><i>In all future correspondence regarding the dual review of the project involving reconstruction of the I-65/I-70 North Split Interchange in Marion County (Des. Nos. 1592385 & 1600808), please refer to DHPA No. 21534.</i></p>	
Indiana Department of Natural Resources – Mitchell K. Zoll – February 8, 2018	
<p><i>Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C 306108); implementing regulations at 36 C.F.R. Part 800, and the “Programmatic Agreement (PA) Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In The State of Indiana” (“Indiana Minor Projects PA”); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code (“IAC”) 20-4, the staff of the Indiana State Historic Preservation Officer and the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed HNTB’s letter of January 8, 2018, with attachments, and the enclosed aforementioned historic property report (“HPR”), which arrived on January 9.</i></p> <p><i>In regard to buildings and structures, we concur with the conclusions of the historic property report regarding those properties listed in the National Register of Historic Places, Indiana Register of Historic Sites and Structures, and the eligibility and ineligibility of historic resources</i></p>	<p><i>Thank you for these comments. For the purposes of this Section 106 undertaking we would prefer to utilize the more inclusive State Register listed boundaries for the Holy Cross/Westminster Historic District as the recommended National Register-eligible boundaries as described in the HPR.</i></p>

within the area of potential effects.

The summary of the report notes that within the area of potential effects of the I-65/I-70 north split interchange reconstruction, there are ten existing districts listed in the National Register of Historic Places, twenty-seven individual properties listed in the National Register, one district and two resources included in the Indiana Register of Historic Sites and Structures, two National Historic Landmarks, and a number eligible properties and districts. Among significant number of resources enumerated in the historic property report, we specifically make note of the following properties (some of which may be newly identified) that the consultants recommended as individually eligible for inclusion in the National Register of Historic Places: John Hope School No. 26 at 1301 E. 16th (IHSS Site #098-296-01212), James E. Robert School No. 97 at 1401 E. 10th Street (IHSSI Site #098-296-01220), Charity Dye Elementary School No. 27 at 545 E. 17th Street (IHSSI Site #098-296-01309), Knights of Pythias Building at 941 N. Meridian (IHSSI Site #098-296-01378), Fame Laundry at 1352 N. Illinois Street (IHSSI Site #098-296-01421), Stutz Motor Car Company at 1002-1008 N. Capital Avenue (IHSSI Site #098-296-01426), and St. Rita's Catholic Church Parish Complex at 1733 Dr. Andrew J Brown Avenue (AL062). We also note as a result of this project the two newly identified districts recommended for inclusion in the National Register of Historic: Saints Peter and Paul Cathedral Parish Historic District, and Windsor Park Neighborhood Historic District.

Furthermore, we would like to offer some comments or clarifications about a few of the properties identified in the historic property report.

For the Charles E Stutz Sales Company at 850 N. Meridian Street (IHSSI Site #098-296-01429), which has been recommended ineligible, we note that if the interior integrity were found to be intact, boarded up windows uncovered, and/or the building were restored similar to other automotive heritage structures in Indianapolis, a re-evaluation of its eligibility might be justified. However, based on what is currently known and observable, the consultant's assessment of ineligibility appears to be appropriate.

Regarding the Cottage Home Historic District, for which the National Register listed district was identified in the report, we note the Cottage Home is also in the Indiana Register of Historic Sites and Structures (State Register). The Cottage Home Historic District boundaries for State Register listing include the entire area contained by 10th

<p><i>Street on the north, Michigan Street on the south, Oriental Street on the east, and the railroad tracks on the west. While this noted, we do not believe that this necessarily impacts or changes the assessments of the eligibility or ineligibility as contained in the report.</i></p> <p><i>Regarding the Holy Cross/Westminster Historic District, for which the State Register listed boundaries were denied for National Register listing, the staff of the Indiana SHPO believe that a smaller, National Register eligible district may exist around the core area of Arsenal Street. However, this portion of the district appears to be outside of the area of potential effects for the undertaking.</i></p> <p><i>For the expansion of the APE for traffic diversion, we accept methodology and proposed expansion to identify resources and consider potential effects on historic bridges and historic or unique features. We look forward to receiving the results of the historic property identification efforts following the two-tiered methodology explained in the submittal and January 26, 2018 meeting.</i></p> <p><i>Additionally, we look forward to soon receiving further, detained information regarding the proposed alternatives for the project, as the plans are developed.</i></p>	
Indiana Department of Natural Resources – Chad Slider – February 9, 2018	
<p>Would you happen to have an electronic copy of the Historic Property Report and/or the maps, showing the recommended boundaries for the eligible historic districts that could be shared with Mark? Otherwise, I could try scanning the maps.</p>	<p>Maps from the HPR are attached. I think they are small enough to make it to you.</p>
Old Northside Historic District – Hilary Barnes – January 31, 2018 (to Chad Slider at the Indiana Department of Natural Resources)	
<p>It looks like you have the current Consulting Party contact for the Old Northside Foundation listed as Nancy Inui, who was our past President. Garry Elder should be the Consulting Party contact for the Old Northside Foundation. Garry is our current President and the person approved to be the Old Northside Foundation Consulting Party. Garry's email is eldergarry@sbcglobal.net.</p>	<p>Thanks for the information. We'll note the change from Nancy to Garry. I've also copied Kia Gillette with HNTB, who is coordinating the federal consultation for this undertaking. (from Chad Slider at IDNR)</p> <p>Mr. Elder was added as a consulting party on February 2, 2018. Ms. Inui previously indicated she wanted to remain as a Consulting Party, so she is also on the consulting party list. (from Kia Gillette at HNTB)</p>
Old Northside Historic District – Hilary Barnes – June 8, 2018	
<p>May I please be added to the Section 106 consulting parties list as the representative for the Old Northside? Our current representatives haven't been able to attend regularly due to their work schedules, so after discussing with them (Garry Elder, Brent Pierce, Travis Barnes) I've agreed to go as the ONS representative. They may still want to stay on the email list, but I will be the one planning to attend future meetings on behalf of the ONS.</p>	<p>Mrs. Barnes was added as a consulting party on June 10, 2018.</p>

Indianapolis Metropolitan Development – Meredith Klekotka – February 6, 2018	
<p>As I mentioned at the public meeting, some of the considered configurations for your interchange rebuild and for the maintenance of traffic during reconstruction would greatly impact roadways we have posted (and some unposted) weight limit restrictions on – including Alabama, College, Central, 10th etc.</p> <p>ISA maintains these weight limit restrictions in GIS (I believe they are approved through city-council?) in the CNRTLNS layer. Sandeep, can you see that INDOT gets the GIS shape for roadways with weight restrictions? No need to send all the attributes, just weight limit and street name/ID should be sufficient. Kia, if you need more, please let me know.</p>	<p>Thanks for the information! This will be very helpful. We will contact Michelle to get the data.</p> <p>Just to clarify, we are not proposing the recommended APE expansion areas as official or unofficial detours. We don't have a maintenance of traffic plan yet and it likely won't be prepared until we have a preferred alternative. We think the recommended APE expansion areas are streets that could see increased truck traffic if the North Split interchange is closed. We will revisit the APE expansion areas based on the City's weight limit restrictions.</p>
Old Near Westside – Paula Brooks – February 6, 2018	
<p>As per our earlier conversation, I am requesting an extension of the current closing date of the Section 106 (Historic Resources) Public Comment Period from Friday, February 9th, 2018 to February 28th, 2018.</p> <p>Do you mind confirming this request is approved by responding to this email?</p>	<p>It is fine to provide comments for the Section 106 process comment period by February 28, 2018.</p>
<p>Kia, I spoke with Janet Schneider about serving as a contributing consultant for the old near westside on the interstate expansion project. I've copied her on this message so the two of you can do what's needed.</p>	<p>An email was sent to Ms. Schneider on February 7, 2018 explaining the process to become a consulting party.</p>
St. Joseph Historic Neighborhood – Pete Haupers – February 9, 2018	
<p>We plan to send our commentary by noon today to meet the deadline. Have you received the majority of the other consulting party comments and will there be an opportunity for us to see the other comments?</p>	<p>The only other comments I've received so far are from the North Square Neighborhood Association and the State Historic Preservation Officer. They are both attached.</p> <p>If you need additional time, we will take them next week too.</p>
<p>As promised, please find the SJHNA Position Statement on the North Split Project.</p> <p>We put a significant amount of thought into our position and would like to emphasize our sincere commitment towards finding an optimal solution. If you would like clarification on any points within our position, please reach out in a timely manner.</p> <p>We look forward to the next steps. Could you please let us know the procedure from here as to how and when our position will be addressed?</p>	<p>Thank you for providing these detailed comments. They are addressed as part of this Section 106 correspondence.</p>
<p>We understand that your review and response of our Position Statement may take a few days time, however in the meantime would you please confirm receipt of our Position Statement and its addition to the formal project record as of Friday, February 9th?</p>	<p>Thank you for sending these comments. I just wanted to confirm that we received them and they will be included in the project record.</p>

St. Joseph Historic Neighborhood Association, Inc. (SJHNA) is fully within the Area of Potential Effect (APE) of this project scope and is a consulting party to HNTB. It is our opinion that the INDOT proposal to expand and rebuild the I-65/I-70 North Split will significantly harm our historic district.

Our concerns fall into three areas, outlined below: (a) the nature of the proposal itself, (b) the proposed process, and (c) corrective actions we would like to see pursued.

The INDOT Proposals

SJHNA is one of the most heavily and directly affected neighborhoods within the APE. The North Split currently forms the northern border of our neighborhood, and we have as many or more residents within 20 feet of the current Right of Way (ROW) than any other neighborhood. Accordingly, our interest in the proposal involves aesthetics, quality-of-life, traffic noise and pollution, and convenience. Unlike out-of-town long-haul drivers, for example, who may complain about adding two minutes to their transit across town, our residents exist within the din and grit of the freeway 24 hours per day. The engine braking, the smell of exhaust, the vibration, and the dust enters our bedrooms and kitchens, and covers our children's toys in our back yards. INDOT's current plans will only increase these negative effects for SJHNA residents. Clearly, this is not an attractive option to us.

Furthermore, many of our residents look directly at the freeway from their living room and bedroom windows. While not the ideal visage, the current roadway, with its green berms and tree plantings, at least softens and buffers the freeway from neighboring residences. Both of INDOT's proposals destroy any semblance of livability along the ROW. We anticipate the effect will lead to hollowing out of corridors along the ROW (in our case, this includes 11th street from Pennsylvania St. to Central Ave.), as the neighbors who can afford to do so will seek better locations. In short, the INDOT proposals risk plunging our now revitalizing neighborhood back into the desolation of the decades following the original freeway construction.

We are fooling ourselves to think the current Proposal A, with its concrete retaining walls, will not become an immediate graffiti target, and eventually a cracked, scrub-grass-fringed barrier. Proposal D, with its at-grade exit ramps, obliterates the neighborhood feel of multiple quiet intersections, which are today teeming with pedestrian commuters, mothers and grandparents pushing strollers, and bicyclists.

Effects to historic properties have not yet been determined. They will be determined as part of the Section 106 consultation with the SHPO and consulting parties once more information on the preferred alternative is available.

An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.

Maintenance of traffic options have not yet been determined. Heavy truck traffic in neighborhoods will be a consideration during development of the maintenance of traffic plans.

INDOT and FHWA are following the NEPA process. A local community group completed renderings from INDOT's Project Intent Report, a preliminary planning document. The Project Intent Report did not identify a preferred alternative for the project. The preferred alternative will be determined as part of the NEPA process.

Additional options were considered as part of the System-Level Analysis. They were not presented at Consulting Parties Meeting #2 because they were not yet available. They were discussed at Consulting Parties Meeting #3.

INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility needs, probable cost, and traffic impacts downtown and in nearby neighborhoods.

The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential options. The options were not ranked and no specific system-level recommendation was made in the study.

The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.

- 1. No-Build (maintain existing configurations)*

<p><i>We understand INDOT's responsibility to facilitate traffic flow. However, there are better places to accommodate this flow than the most densely populated residential areas in the state. Under the current proposals, wider corridors will absorb more traffic until another expansion eventually becomes necessary. We want to see the long-term health of our neighborhood receive due consideration, even if the alternatives are not as obvious.</i></p> <p><i>While most of our concern focuses on the long-term impact, in the short term, during construction, our neighborhood will also be greatly affected. Some of the most likely detours proposed by HNTB dissect our neighborhood. Alabama, a quiet street with very small setbacks, and frequented by bicycle and foot traffic, should not become subject to heavier truck traffic. Other streets, such as St Claire, 10th, and 11th are lined by apartments, condominiums and houses through their entire length within St. Joseph. Given the duration of the construction period, INDOT should ensure that temporary diversions and heavy truck traffic be kept away from these densely inhabited residential areas.</i></p> <p><u><i>Concerns on the Process</i></u></p> <p><i>We have grave concerns with the lack of process transparency. Our neighborhood's perception is that the current proposals were secretly expedited, to avoid the messy but constructive process of community feedback. Our first exposure to renderings of the INDOT proposals was in early January 2018: late, considering the impact of the change. Moreover, these did NOT come from INDOT, but from a volunteer coalition of architects.</i></p> <p><i>The lack of transparency continues. At the recent Consulting Parties #2 Meeting conducted by HNTB, we were told that additional proposals were being considered, and we were asked for comments. However, none of these additional proposals were presented. We would like to know which proposals are being considered, and then provide feedback.</i></p> <p><i>As a historic district, we have a pride-of-place stretching back nearly 200 years. Regarding the Section 106 Review, which is meant to minimize the impact to historic districts, the current INDOT proposals seem to comply with the letter but not the spirit of this regulation. It is hard to imagine a more out-of-character addition to our historic area than towering retaining walls, maximized through traffic, and quiet streets converted into off-ramps.</i></p> <p><i>Lastly, the design-build process is not an encouraging vehicle for arriving at the best solution to such a unique stretch of roadway that dissects multiple historical</i></p>	<ol style="list-style-type: none"> <i>2. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit*</i> <i>3. Upgrade existing Interstates for entire inner loop</i> <i>4. Depress downtown Interstates*</i> <i>5. Replace Interstates with at-grade boulevards*</i> <i>6. Construct at-grade boulevards + Interstates in tunnels*</i> <i>7. Construct new Interstate link – new I-65 west leg</i> <p><i>*Suggested by various community groups</i></p> <p><i>The results of the System-Level Analysis were published in a report released on May 3, 2018, and were presented to the CAC, Consulting Parties, and several local groups during May and early June. A public open house was held to present the results of the System-Level Analysis on May 23, 2018.</i></p> <p><i>At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the NEPA process. Project-level alternatives for the EA would be developed that best meet the project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.</i></p> <p><i>It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split project and would take many years to plan, study, design, and implement. The current condition of the North Split interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.</i></p> <p><i>A Section 4(f) evaluation will be completed if FHWA determines it is required.</i></p> <p><i>INDOT has worked with and will continue to work with the City of Indianapolis and the Indianapolis Metropolitan Planning Organization during the North Split project.</i></p>
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<p><i>neighborhoods. It is easy to predict that otherwise feasible alternatives would be disqualified by a profit-maximizing developer seeking the lowest cost.</i></p> <p><u><i>Corrective Actions We Would Like to See Taken by INDOT/HNTB</i></u></p> <p><i>As stakeholders, taxpayers, fellow residents, and neighbors, we kindly request:</i></p> <ul style="list-style-type: none"> <i>□ The public release of the complete set of proposals under consideration, even if additional analysis is still required on them, and keep consulting parties aware of progress on this analysis.</i> <i>□ Initiate the Federal Section 4F Review Process as soon as it is procedurally available.</i> <i>□ Release the criteria used for the evaluation of alternatives, and the relative weight each criterion has in the consideration, and an opportunity for consulting parties to provide feedback on these criteria.</i> <i>□ Work with the City of Indianapolis on a world-class solution to this unique transportation problem. Consider innovative ideas that enhance pride-of-place for our city and all the neighborhoods within the APE, as similar cities (e.g., Austin, Columbus OH, Dallas, and Portland) have done.</i> 	
St. Joseph Historic Neighborhood – Pete Haupers – March 2, 2018	
<p>The St. Joe Neighborhood is looking for a copy of the minutes from the Consulting Party #2 Meeting at the Benjamin Harrison House. Could you please send that or let us know where we can find it online?</p> <p>Also, we would like to request that HNTB send advanced notice of the next meeting and please consider another time of day (evening or weekend).</p>	<p>We will have the meeting minutes available soon, following a final review by FHWA and INDOT.</p> <p>Consulting Parties Meeting No. 3 was held in the evening to accommodate this request.</p>

St. Joseph Historic Neighborhood – Pete Haupers – March 20, 2018	
<p>Thanks for getting back to me. Any updates on those minutes since your email?</p> <p>My goal in mentioning this is to be productive. The perception among community leaders is that there is a "you come to us" attitude from the project owners and representatives. We don't hold our neighborhood meetings on weekdays at 9AM because our residents are generally at work. Most neighborhoods hold them on weekday evenings. I would think your process should be aligned with the local neighborhood meeting strategies.</p> <p>I understand the commitment of being a consulting party and we will always have a representative at your meetings, but you are asking us to take time off work so you can operate during traditional business hours. The meetings are then set on your terms rather than those of the stakeholders. The consensus among community leaders is that holding meetings during traditional business hours will hinder attendance. I strongly encourage you to further study the timing of these meetings and make efforts to increase not only attendance but also venue size. The ideal scenario would be multiple sessions at different times to maximize the input you desire. If we cannot have different timing options, I would like to please request at least 3 weeks notice for future meetings with the information emailed or available at least one week in advance of the meeting. Would that be something we could agree on? Lastly, how many consulting party meetings, in total, do you anticipate (ballpark)?</p>	<p>The meeting minutes were sent out last week. Please let me know if you did not receive those.</p> <p>Consulting Parties Meeting No. 3 was held in the evening to accommodate this request.</p> <p>We anticipate about six more meetings throughout the Section 106 process.</p>
St. Joseph Historic Neighborhood – Pete Haupers – April 25, 2018	
<p>Thanks, Kia! I plan to attend. Do you know if there will be information available in advance of the meeting to review?</p> <p>Also, I know Emily Kibling is having a CAC meeting earlier on May 21st. What is the difference between these two meetings other than the audience?</p>	<p>Yes, the purpose of the Consulting Parties meeting is to review the results of the System-Level Analysis. I will send out a link to that document on the website prior to the meeting, likely next week.</p> <p>There is a briefing with the CAC on May 3 which will review the results of the System-Level Analysis. The Consulting Parties meeting on May 21 will likely be similar to the May 3 CAC meeting. The CAC meeting on May 21 will be to answer questions on the System-Level Analysis after the CAC has had a chance to review and digest it; as well as discuss the North Split project.</p> <p>The information presented on the May 3 CAC meeting and May 21 Consulting Parties meeting will be very similar, if not identical. However, the questions and discussion could differ.</p>

St. Joseph Historic Neighborhood – Pete Haupers – September 7, 2018	
<p>I wanted to check in on the status of the North Split Alternatives.</p> <p>Do you have a timetable for releasing these or tentative future meeting dates?</p>	<p>We hope to have meeting dates identified soon. We will send meeting invitations out as soon as we have the dates identified.</p>
Chatham Arch – David Pflugh– February 9, 2018	
<p>Attached please find a letter from Chatham Arch regarding the north split reconstruction project.</p> <p>We look forward to seeing Emily (and possibly you?) at our February 27th neighborhood association meeting.</p>	<p>Thank you for sending these comments. I just wanted to let you know we received them and they will be included in the project record.</p> <p>We will see you on the 27th. Thanks for inviting us to attend.</p>
<p><i>I write to provide my neighborhood's feedback following the second Consulting Parties Meeting of January 26, 2018. I am President of the Chatham Arch Neighborhood Association ("CANA").</i></p> <p><i>Chatham Arch is part of the Chatham Arch/Massachusetts Avenue Historic District ("CAMA"). In 1980 and 1982, Chatham-Arch and Massachusetts Avenue (respectively) were listed in the National Register of Historic Places and awarded federal historic district status. Also in 1982, Chatham-Arch was designated by the Indianapolis Historic Preservation Commission as a locally protected historic district for the purpose of preserving the surviving historic resources, encouraging sensitive new development, and protecting the general residential character of the neighborhood.</i></p> <p><i>Chatham Arch is bounded on the north and east by I-65 and I-65/I-70 and is located immediately southwest of the north split interchange. Because of its location, the residents of Chatham Arch are especially interested in the proposed north split interchange reconstruction (the "Project"). CANA would like to express a strong and united opinion that the review process currently being conducted under Section 106 of the National Historic Preservation Act of 1966 (54 USC § 306108) be expanded to include consideration of alternative designs, inclusion of the south split interchange, more detailed planning of detour routes which may pass through Chatham Arch, increased availability of public transportation, and studies of the effects of pollution, noise, vibration, and lower property values on our historic neighborhood.</i></p> <p><i>Chatham Arch was negatively impacted by the original construction of the interstate through downtown Indianapolis. Very recently, CANA attempted to have power lines relocated from the site of the Bottlenworks development to run along the interstate right-of-way. INDOT refused this option because of the planned interstate lane additions. Instead, the power lines are</i></p>	<p><i>Thank you for these detailed comments and information.</i></p> <p><i>Effects to historic properties have not yet been determined. They will be determined as part of the Section 106 consultation with the SHPO and consulting parties once more information on the preferred alternative is available.</i></p> <p><i>INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility needs, probable cost, and traffic impacts downtown and in nearby neighborhoods.</i></p> <p><i>The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential options. The options were not ranked and no specific system-level recommendation was made in the study.</i></p> <p><i>The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.</i></p> <ol style="list-style-type: none"> <i>1. No-Build (maintain existing configurations)</i> <i>2. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit*</i> <i>3. Upgrade existing Interstates for entire inner loop</i> <i>4. Depress downtown Interstates*</i> <i>5. Replace Interstates with at-grade boulevards*</i> <i>6. Construct at-grade boulevards + Interstates in</i>

<p><i>being routed along a residential street near historic homes. Such indirect effects of the Project are likely to felt by the neighborhood in coming years unless proper planning and forward-looking thinking is adopted now.</i></p> <p><i>CANA feels the mere addition of interstate traffic lanes, without more intensive solutions, will only increase congestion through the downtown area. Added lanes will not reduce congestion due to crossing traffic patterns; rather additional lanes will intensify the problem. Also, retaining walls built to support the added lanes will serve to further isolate and divide Chatham Arch from other historic neighborhoods, and provide an impediment to pedestrian traffic.</i></p> <p><i>CANA hopes INDOT and HNTB will engage in an open dialogue with Chatham Arch and other neighborhoods, historic and otherwise, located with the area of potential effect of the Project. Working together, the Project can become a much-needed improvement to downtown Indianapolis, both aesthetically and economically.</i></p>	<p><i>tunnels*</i></p> <p><i>7. Construct new Interstate link – new I-65 west leg</i></p> <p><i>*Suggested by various community groups</i></p> <p><i>The results of the System-Level Analysis were published in a report released on May 3, 2018, and were presented to the CAC, Consulting Parties, and several local groups during May and early June. A public open house was held to present the results of the System-Level Analysis on May 23, 2018.</i></p> <p><i>At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the National Environmental Policy Act (NEPA) process. Project-level alternatives for the Environmental Assessment (EA) would be developed that best meet the project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.</i></p> <p><i>It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split project and would take many years to plan, study, design, and implement. The current condition of the North Split interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p>
<p>American Institute of Architects – Mark Beebe – February 14, 2018</p>	
<p>I am requesting to be registered as an INDOT consulting party on behalf of the Indiana Chapter of the American Institute of Architects (AIA).</p>	<p>Mr. Beebe was added as a consulting party on February 16, 2018.</p>
<p>Lockerbie Square Peoples Club – Jeffrey Christoffersen – February 14, 2018</p>	
<p>I would like to request to be a consulting party, representing Lockerbie Square Peoples Club for the upcoming North Split hearings. I have included my contact information below. If you require anything additional, please let me know.</p>	<p>Mr. Christoffersen was added as a consulting party on February 16, 2018.</p>

Fletcher Place – Glenn Blackwood – February 16, 2018	
I attached the response form from FPNA to be a consulting party. Please let me know if I can provide any more information.	Mr. Blackwood was added as a consulting party on February 19, 2018.
Fletcher Place – Glenn Blackwood – February 19, 2018	
Could you please send me details on the next meeting, if there is an agenda?	We have not scheduled the next Section 106 Consulting Parties meeting. It will likely be later this spring. We will send out a meeting request to all Consulting Parties once it is scheduled.
Fletcher Place – Glenn Blackwood – March 1, 2018	
I heard earlier this week that a consulting parties meeting has now been scheduled for March. Do you have any updates on this? It might not be related to the Section 106.	There is a Community Advisory Committee (CAC) meeting next Tuesday March 13. This is a different group than the Consulting Parties, which focus largely on historic property concerns. I think we have you down as attending representing the Fletcher Place Neighborhood. So you've probably already received a response on this but I wanted to follow up just in case.
Fountain Square Neighborhood Association – Andrew House – February 16, 2018	
I would like to register as a consulting party for the Section 106 hearings regarding the I-65/I-70 split INDOT project.	Mr. House was added as a consulting party on February 21, 2018.
Old Northside Neighborhood – Dan Mullendore – February 19, 2018	
Where can I get a list of the consulting parties involved in the Friday Section 106 meeting so that I can be sure the views of the Old Northside Neighborhood association are represented? This what the Federal Guidelines from the ACHP say should happen.	Thank you for reaching out about Friday's Consulting Parties meeting. The Old Northside Neighborhood Association president Nancy Inui and Travis Barnes are Consulting Parties representing the Old Northside. Both have been invited to Friday's meeting to represent the Old Northside neighborhood. We encourage you to reach out to them with concerns regarding historic properties so they can be conveyed during the meeting or via written comments. Please note, design alternatives will not be presented at this meeting. They will be presented at later public information meetings. This Consulting Parties meeting will focus on the identification of historic properties near the project area. Meeting minutes will be posted to the website.
<i>I think you were at the Section 106 meeting at the Benjamin Harrison House? When none of the designated ONS representatives were there to speak, I stood up as a member of the board of the Old Northside Neighborhood Association and expressed some concerns. Specifically, the ONS concerns had to do with the</i>	<i>Thank you for sending these comments. Do you want to be a consulting party representing the Old Northside? Or you could also be a proxy for the existing representatives if they are not available to attend. Effects to historic properties have not yet been determined. They will be determined as part of the Section 106</i>

<p><i>potential change in setting for the ONS. The current Interstate is screened from the ONS Historic district by trees and grass embankment. The only potential plans we have seen my eliminate that and erect vertical concrete walls. This change is setting would have a detrimental effect on the ONS Historic district.</i></p> <p><i>The current Interstate had changed the neighborhoods setting in that street grid and pedestrian flow of traffic has been cut off to the south. Any changes that would further disrupt the street grid, or expand the width of the Interstate to make this area less pedestrian friendly would negatively effect the setting of the ONS historic district.</i></p> <p><i>The potential addition of flyover ramps in the "spaghetti bowl", would potentially introduce new undesirable audible elements to the ONS Historic District, as well as moving the travel lanes closer (by widening the right of way). If vertical concrete walls are erected, new and undesirable audible elements will be introduced from the street level traffic as sound is reflected back in the ONS historic district.</i></p> <p><i>Properties along 12th street are already effected by the audible elements, as well as the setting (proximity to the Interstate) and any additional changes may well cause some of these properties to fall into neglect. Between Alabama and New Jersey there are properties that already may show some signs of neglect and anything that would make additional undesirable audible or setting changes, may tip these properties to total abandonment.</i></p>	<p><i>consultation with the SHPO and consulting parties once more information on the preferred alternative is available.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p> <p><i>A Noise Analysis will be completed for the preferred alternative if it is determined to be required.</i></p>
A proxy might be best.	No response required.
Southeast Neighborhood Land Use Committee – Jim Lingenfelter – February 22, 2018	
I have been asked to bring Southeast Neighborhood Land Use Committee to the table so to speak for input to the project. The Southeast Neighborhood Land Use Committee is an umbrella committee for the 12 neighborhoods under the Southeast Community including Fletcher Place, Fountain Square, Bates Hendricks, Fountain Square Alliance, North Square, Garfield Park, Holy Rosary, Irish Hill, Norwood Place, Old South Side, SECO, Twin Aire and WeCan. Please add my information to your contact list.	Mr. Lingenfelter was added as a consulting party on February 25, 2018.
Martindale Brightwood Community Development Corporation – Josephine Rogers-Smith – February 22, 2018	
<p>I am asking that I be considered a “consulting party” for your neighborhood of Martindale Brightwood. I am the Executive Director of the Martindale Brightwood Community Development Corporation.</p> <p>We also have four neighborhood association presidents that are interested. They may not however be able to attend all meetings.</p>	Ms. Rogers-Smith was added as a consulting party on February 25, 2018.

Windsor Park Neighborhood Association, Inc – Jennifer Eamon – February 22, 2018	
<p><i>Please accept this letter, from the Windsor Park Neighborhood Association, Inc. (WPNA) urging all parties to fully consider the impacts and alternatives for what INDOT has proposed.</i></p> <p><i>WPNA has been identified as an INDOT Consulting Party and this project will impact our community. Decades ago, the interstate bridges effectively severed our community from the nearby neighborhoods and Downtown. The disinvestment and disconnection that followed are damages from which we have only recently begun to recover. Windsor Park Neighborhood Association’s Land Use Committee met on February 13th, 2018 and discussed both what INDOT has shared publicly and the alternative plans being shared by HUNI. A motion was made and a unanimous vote followed (14/0) that WPNA supports the sentiment shared by City officials and other neighborhoods discussing this project. We need more information from INDOT and want the impacts and alternatives explored. We are very concerned about the lack of information shared by INDOT regarding this expensive and potentially detrimental project. We strongly urge INDOT to work with the City and the MPO to study alternatives that support neighborhood revitalization through greater connectivity, quality of life, and public transportation access.</i></p> <p><i>For the reasons stated above, we respectfully request that you slow down. What happens in planning the I65/I70 North Split, this spring, will also have a legacy. Rethinking the infrastructure is an opportunity that comes around once every 50-60 years.</i></p>	<p><i>INDOT has worked with and will continue to work with the City of Indianapolis and the Indianapolis Metropolitan Planning Organization during the North Split project.</i></p> <p><i>INDOT completed a high-level planning study of potential changes to the downtown Interstate system, including concepts proposed by community groups. The study was called the System-Level Analysis. Concepts were reviewed to identify their potential effectiveness in meeting mobility needs, probable cost, and traffic impacts downtown and in nearby neighborhoods.</i></p> <p><i>The System-Level Analysis was conducted to support public dialogue and to determine whether the North Split project scope should be adjusted to address system-level issues. It was recognized that additional future studies would be needed to fully define a future system. The System-Level Analysis provided a baseline for future studies by evaluating performance, impacts, and costs of a range of potential options. The options were not ranked and no specific system-level recommendation was made in the study.</i></p> <p><i>The System-Level Analysis study area was the full downtown Interstate system. Alternative concepts proposed by various groups were intended to enhance connectivity, sustainability, and economic vitality of downtown Indianapolis and surrounding neighborhoods. These concepts are listed below.</i></p> <ol style="list-style-type: none"> <i>8. No-Build (maintain existing configurations)</i> <i>9. Transportation System Management (TSM), including diversion of through traffic to I-465 and/or transit*</i> <i>10. Upgrade existing Interstates for entire inner loop</i> <i>11. Depress downtown Interstates*</i> <i>12. Replace Interstates with at-grade boulevards*</i> <i>13. Construct at-grade boulevards + Interstates in tunnels*</i> <i>14. Construct new Interstate link – new I-65 west leg</i> <p><i>*Suggested by various community groups</i></p> <p><i>The results of the System-Level Analysis were published in a report released on May 3, 2018, and were presented to the CAC, Consulting Parties, and several local groups during May and early June. A public open house was held to present the results of the System-Level Analysis on May 23, 2018.</i></p> <p><i>At the conclusion of the System-Level Analysis, it was determined that the North Split interchange should tie in with the existing Interstate system, and the North Split environmental study should move forward, with the scope of the project to be defined in the NEPA process. Project-level alternatives for the EA would be developed that best meet the</i></p>

	<p><i>project purpose and needs while minimizing impacts on the surrounding environment. Comments on the System-Level Analysis would be considered in developing these project-level alternatives, and efforts would be made to minimize the width and footprint, and to make other adjustments to respond to community concerns.</i></p> <p><i>It was recognized that concepts for the inner loop Interstate system are larger in size and scope than the North Split project and would take many years to plan, study, design, and implement. The current condition of the North Split interchange requires that it be reconstructed in the near term (next two to four years), and that it must connect and work effectively with the Interstate system that currently exists.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p>
Interstate Business Group/School 9 LLC– Paul Knapp – February 26, 2018	
<p>I am writing with a request to be included as a Consulting Party for the I-65/I-70 North Split project. In addition to being the managing member of School 9, LLC which owns the historic School 9 alongside the east leg of I-65/I-70, I am also the organizer of the Interstate Business Group which has come together to express concerns to Commissioner Joe McGuinness about the reconstruction of the downtown highway system. Our group includes the businesses and organizations listed below.</p> <p>Please let me know whether I will be recognized as a Consulting Party.</p>	<p>Mr. Knapp was added as a consulting party on February 27, 2018.</p>
Indiana Landmarks – Marsh Davis – March 15, 2018	
<p>I look forward to meeting with you tomorrow. Thank you for initiating it and for sending the agenda.</p> <p>I would like to request that the National Trust for Historic Preservation be added to the consulting parties for the 65/70 project. Can you advise as to how we can add them?</p>	<p>The National Trust for Historic Preservation was added as a consulting party on March 17, 2018 and will be invited to all future Consulting Party Meetings.</p>
Indiana Landmarks – Marsh Davis – September 13, 2018	
<p>I’ve been asked lately about the status of the 106 review process, next meetings, etc. Can you provide an update? Any new information you can share about the status of the North Split project will be greatly appreciated.</p>	<p>We anticipate our next Section 106 Consulting Parties meeting will be in October. We will send out an email invitation as soon as we get a date and location nailed down.</p>
Natural Trust for Historic Preservation – Betsy Merritt – March 17, 2018	
<p>Please keep me on your list as the review process moves forward, and I hope to be able to participate directly in the next consultation meeting once you’ve scheduled it.</p>	<p>The National Trust for Historic Preservation was added as a consulting party on March 17, 2018 and will be invited to all future Consulting Party Meetings.</p>

National Trust for Historic Preservation – Betsy Merritt – April 24, 2018	
Can you just confirm whether Indianapolis time coincides with Eastern time or with Central time in May?	Indianapolis is on Eastern time in May.
Indianapolis Historic Preservation Commission – Meg Purnsley – March 23, 2018	
Chris Myers no longer works for the IHPC, so if you could put me on the group email for the consulting parties, that would be great.	Thanks for the update. We’ve removed Chris and included you as a Section 106 Consulting Party for the North Split project.
Also, I am on the CAC for this project as well. So, you can send me any correspondence for that.	I did have a question for you, does the IHPC have shapefiles for the local historic districts that you would be willing to share? I noticed boundaries on the map online are different than the National Register boundaries.
Indianapolis Historic Preservation Commission – Meg Purnsley – March 26, 2018	
Yes, I believe we can send those. Are you looking for specific districts such as the ones that abut the Interstate? I ask because we have 17 districts and I don’t want to try and send that much over to you if you don’t need it.	Thanks for sending this! It doesn’t want to come in correctly in ArcMap. I “think” (am not 100% certain) it should be a layer package and not just the layer file to pull in all the information.
Sandy Cummings – April 30, 2018	
Hello: I'm writing to ask how I can be made aware of the Consulting Parties upcoming meetings? I and my family own the historic building at 1101 N. Delaware Street and would like to hear about plans for the 65/70 redevelopment. Our yard is adjacent to the on-ramp and therefore we expect that our property/building will be affected in some way. Is there another meeting planned?	Ms. Cummings was added as a consulting party on May 3, 2018. The meeting invitation for the May 21, 2018 Consulting Parties Meeting was forwarded to Ms. Cummings.
Sandy Cummings – August 17, 2018	
We are wondering if the proposed timeline for the EA process is available? We’re considering how/when/what to contribute to that process and having the timeline will help us.	As part of the NEPA process, INDOT is currently looking at alternatives to address the needs of the North Split interchange. These alternatives will be discussed and evaluated in an Alternatives Screening Report that will be made available for public review and comment after it is approved by INDOT and the Federal Highway Administration, most likely this fall. A link to the current timeline on the project was also provided.
Old Near Westside/Ransom Place – Denise Halliburton – May 18, 2018	
Denise Halliburton has volunteered to represent the Old Near Westside/Ransom Place as a Consulting Party. She is planning to email you but given the tight time frame I wanted to give you a head's up. [from Paula Brooks] I plan to attend Monday's meeting at 6pm at the Indiana State Museum. I am a Historic Ransom Place Neighborhood resident.	Ms. Halliburton was added as a consulting party on May 20, 2018.

Mass Ave. Merchant's Association – Kurt Phillips – June 20, 2018	
<p>The Mass Ave Merchants Association [MAMA] has designated their representative to the Community Advisory Committee and Section 106 Consulting Parties meetings for the I-65/I-70 North Split project to be the MAMA Board's vice chair for strategic planning, Meg Storrow.</p> <p>The MAMA mission is to protect, represent, and promote the interests of merchants, service providers and arts and cultural organizations located within the Massachusetts Avenue Cultural District.</p> <p>We are a volunteer group of interested property and business owners actively working on advancing the objectives of the Mission Statement through engagement and advocacy.</p>	<p>Ms. Storrow was added as a consulting party on June 20, 2018.</p>

Section 106 Update Memo #2

Attachment D

**Consulting Party Comments & Responses
for System-Level Analysis**



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

Table D.1: I-65/I-70 North Split Project (Des. Nos. 1592385 & 1600808) – Consulting Party Comments & Responses for the System-Level Analysis from May 3, 2018 to June 14, 2018

Note: Comments in italics have not yet received responses. Comments not in italics were responded to previously via email.

Comment	Response
John Boner Neighborhood Centers – Alicia Baker – May 3, 2018	
I hope you're having a great week so far! My name is Alicia Baker and I am representing one of the I65-70 North Split consulting parties (John Boner Neighborhood Centers, the Near Eastside Quality of Life Plan, and IndyEast Promise Zone). I am looking forward to the meeting on the 21st, but in the meantime, I am wondering who I might be able to direct neighbors to contact who have input on the 7 designs released for consideration by INDOT? I received an email that said that INDOT will receive public feedback until June 7th, but the email I received gave no contact name or form for people to use. If you could, please let me know who/where best to direct these comments so it goes to the right person/place... It would be so helpful! Thanks so much for your help! I really appreciate it!	That's a great question, we should have included that information. They can send any comments to info@northsplit.com. That email address goes directly to the project team.
Holy Cross Neighborhood Association – Kelly Wensing – May 21, 2018	
I have had to return to Colorado for a family emergency and won't be able to attend the meeting on May 21. Please be aware that Scott Wilson and/or Pat Dubach may attend on my behalf for HCNA.	Thank you for letting me know. We will plan on seeing Scott and/or Pat at the meeting this evening
Indianapolis Historic Preservation Commission- Meg Purnsley – May 21, 2018	
What is going to be covered at tonight's meeting that wasn't this morning? I am trying to determine if I need to be at this meeting.	The presentation will be very similar to what was covered at the CAC meeting a couple of weeks ago. We will also have a couple of slides describing the Section 106 process and the role of a consulting party. The information isn't really anything new.
Separately, I talked to John Myers today. I respectfully request a meeting with you, John, myself, Marsh Davis, Chad Slider with the SHPO, and Marjorie Kienle with HUNI. I think it is smart for all of us to get on the same page about the review process as it pertains to the IHPC and the Section 106 Review as well as input from the key preservation stakeholders.	A meeting was held with the requested individuals to discuss the IHPC process on July 9, 2018.
That would be fine. Any chance you can send me the slides on the Section 106 Review/Role of the Consulting Party?	The slides for meeting presentation were emailed to Ms. Purnsley.
Andrew House – May 22, 2018	
These need to be BCC'd that's like email etiquette-101. It's a huge privacy and security violation to blast	Section 106 consultation for the North Split project is a public process. We are required to document this process and

<p>someone's email out to a bunch of strangers</p>	<p>use email to transmit information as part of it. Please let me know if you would like to be removed from the consulting party list or would prefer to use a different email address for Section 106 consultation.</p> <p>If you no longer want to be included as a consulting party but are still interested in reviewing Section 106-related documents they will be posted to the project website https://northsplit.com/publicoutreach/section-106-consulting-parties/ as well as INDOT's IN SCOPE website http://erms.indot.in.gov/Section106Documents/ (the Des. No. (1592385 or 1600808) is the most efficient search term, once in IN SCOPE).</p>
<p>Indianapolis Historic Preservation Commission – Meg Purnsley – May 22, 2018</p>	
<p>Thank you for sending the slides from the meeting last night. That was actually quite helpful.</p> <p>Along the same line, please let me know when your team would be able to meet with myself, Indiana Landmarks, and HUNI. I would also like to have Betsy Merritt with the National Trust join in by phone if possible.</p>	<p>A meeting was held with the requested individuals to discuss the IHPC process on July 9, 2018.</p>
<p>Keep Indianapolis Beautiful – Joe Jarzen – May 16, 2018</p>	
<p><i>Our team reviewed the options and of course that has led to many more questions. There are quite a few below. I've bolded some that I feel might be priority questions, but there are several here that we hope to get more clarity. Hopefully we can get to several of these, and that there might be overlap with other questions coming in to you.</i></p> <p><i>a. How does the North Split project impact or determine what happens with the Systems level project?</i></p> <p><i>i. How can we be assured that the N. Split project does not preclude or prohibit what to do with the rest of the system? Will the state invest money twice into this project within a decade?</i></p> <p><i>ii. Is there a plan for the North Split project? When will you share any plan that is being proposed? It is difficult to evaluate resources impacted during the environmental and Section 106 processes if we don't have an idea of what is being proposed.</i></p> <p><i>iii. If we knew the North Split project needed to happen so soon, why was a System Level Analysis completed only now? If it had been done years ago, perhaps this would have allowed more time to evaluate and understand how to handle both the North Split project and the overall system.</i></p>	<p><i>Some questions in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system. All system-level comments are available on the project website: www.northsplit.com</i></p> <p><i>Responses to North Split questions are provided below.</i></p> <p><i>How can we be assured that the N. Split project does not preclude or prohibit what to do with the rest of the system? Will the state invest money twice into this project within a decade?</i></p> <p><i>Because alternatives have not yet been defined or evaluated for the North Split, there cannot be assurances of future and potential impacts or changes. Even if the state makes a minimal investment now, there is a likelihood that new components will need to be replaced if the system is redefined.</i></p> <p><i>Is there a plan for the North Split project? When will you share any plan that is being proposed? It is difficult to evaluate resources impacted during the environmental and Section 106 processes if we don't have an idea of what is being proposed.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It</i></p>

<p><i>b. What is the timeline and process for choosing the option for the system?</i></p> <ul style="list-style-type: none"> <i>i. Can less expensive stabilization work on the whole system be completed to buy time, so that the North Split project and System level work can all happen at one time?</i> <i>ii. What are the next steps for evaluating the seven options?</i> <p><i>c. How does change of habits and encouraging other options play into the decision – separate from economic investment (i.e. tolling, HOV lanes, redirecting traffic, increased local options such as bike lanes and transit)?</i></p> <p><i>d. To what extent is the State working with City Traffic Planners for long term traffic planning for Center Township and Downtown? City planning here and around the world best practices suggest decreasing lanes for personal automobiles and reducing overall VMT to fight climate change.</i></p> <p><i>i. How does maintaining and increasing traffic flow on interstates at peak times compare to long-term plans for city infrastructure and planned traffic patterns?</i></p> <p><i>e. If an independent economic investment study is completed, how will it be effectively used and incorporated into planning the system level work?</i></p> <ul style="list-style-type: none"> <i>i. Would the ReThink Coalition consider focusing its efforts on completing this and then KIB might help support that?</i> <i>ii. Should the EIS be done for all seven or can the options be winnowed down to most logical options?</i> <p><i>f. How does ROW acquisition impact surrounding neighborhood resources (homes and buildings) and plantable space?</i></p> <ul style="list-style-type: none"> <i>i. How much loss of existing green infrastructure will be lost with N. Split development – realizing this may not be known until Section 106/Environmental review is complete? What is the timeline for that?</i> <i>ii. How much consideration is in these options for increasing the opportunities for successful (i.e. longer-term, monitoring and placement with more extensive maintenance) planting</i> 	<p><i>identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p> <p><i>What is the timeline and process for choosing the option for the system?</i></p> <p><i>The Environmental Assessment (EA) and NEPA process for the North Split Project is currently underway and will continue into 2020. A preliminary preferred alternative is identified in the Alternatives Screening Report; however, there will not be a final preferred alternative until the EA is published.</i></p> <p><i>Can less expensive stabilization work on the whole system be completed to buy time, so that the North Split project and System level work can all happen at one time?</i></p> <p><i>Less expensive stabilization work could be conducted on the system while further planning studies are conducted, except where infrastructure needs warrant greater near-term action, such as on the North Split interchange. It is unlikely that the complete system would be constructed at one time, however, due to funding and maintenance of traffic constraints.</i></p> <p><i>How much loss of existing green infrastructure will be lost with N. Split development – realizing this may not be known until Section 106/Environmental review is complete? What is the timeline for that? ow much consideration is in these options for increasing the opportunities for successful (i.e. longer-term, monitoring and placement with more extensive maintenance) planting and mitigating the change?</i></p> <p><i>Opportunities for enhancements, vegetation, and other aesthetic improvements are typically considered as part of environmental mitigation and design processes. They can also be considered at a system planning level in terms of potential open space, enhancement of right of way, etc.</i></p>
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<p><i>and mitigating the change?</i></p> <p><i>g. Concept Specific Questions:</i></p> <p><i>i. Are there any options that are being excluded due to effectiveness or funding already, i.e. the basic repair or tunnel/boulevard options? If so, this may appear to undermine the good faith process.</i></p> <p><i>ii. Concept 2 suggests only 10% is through traffic, but is it dismissed because that's not substantial enough. The other options seem to be comparative, so is this being dismissed too soon? Is there a way to incentivize traffic to take other options. Other cities toll roads and have tax share, whereas Indiana and Marion County does not, so roads are being used with little to no financial return.</i></p> <p><i>iii. Added lanes in Option 3 needs more clarity as this is a primary concern from neighborhoods.</i></p> <p><i>iv. Why does Option 4 have so much more ROW acquisition than other options except for the West St expansion?</i></p> <p><i>iv. Are there ways to combine concepts to increase quality and effectiveness?</i></p> <p><i>h. When I-65 is closed this year, will INDOT complete any traffic counts for travel diverted along 465 during that time? Is there anything looked at during this project that might influence or inform the System Level review.</i></p> <p><i>i. Do the existing traffic counts include points of entry from within the 465 outer belt? This might provide information for trips made that could be done on local roads therefore alleviating highway congestion.</i></p>	
Interstate Business Group – Paul Knapp – May 19, 2018	
Are comments on the System Level Analysis from the public kept and recorded formally for FHWA purposes? If so, can they be entered via email?	Yes, comments on the System-Level Analysis will be included in the formal project record. They can be submitted via email.
And should those emails go to you or to Borshoff to make the record?	Generally, if they are sent to either firm they will make it to the record. But the best address to use is info@northsplit.com
Interstate Business Group – Paul Knapp – June 6, 2018	
First, as INDOT and HNTB representatives have repeatedly said in public meetings, their System Level Analysis was just “a beginning point”, “incomplete”, and did not take into consideration many factors of replacing two interstates in the core urban center of a capital city including economic impact and community impact of possible alternative designs. As such, I question whether it is worthy of any meaningful public comment because it	<p><i>Some questions in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p> <p><i>Responses to North Split questions are provided below.</i></p>

has served to largely distract the public and the media from the much more immediate issue at hand: the coming “improvements” of the North Split.

I would strongly recommend that the System Level Analysis be put aside for the time being and that the current planning and engineering work for the North Split be halted and put aside, while INDOT immediately move forward with all appropriate measures to 1) stabilize bridges within the North Split that present safety concerns—without expanding those bridges or the lanes upon them—and 2) address safety concerns raised by “weaving” traffic through speed and signage control measures. From answers given by HNTB representatives in public meetings, such “band-aid” measure should extend the expected life of the North Split 3-5 years. Within the extended life period, and probably within a two year time period, I would urge the State, including INDOT, the Department of Commerce, and all other economic development bodies, to immediately convene a communitywide, including the City of Indianapolis, the Metropolitan Planning Organization, the Rethink 65/70 Coalition, and others, comprehensive study and planning process to take the most advantage of this historic opportunity of replacing two major interstates that run through the State’s capital city and its main economic engine.

I urge our State’s leaders not to enter the planning stage of this massive project with blinders on. The opportunity before us is decidedly NOT about improving traffic flow. The opportunity is a once-in-a-lifetime chance to fundamentally change the identity and economic platform of the State’s biggest economic engine. We can literally remove physical barriers to an economic rebirth encircling downtown Indianapolis and make Indiana’s capital city the envy of the rest of the country. Designed the right way, we can take a highway reconstruction project and turn it into an adrenaline pump into the State’ largest economic engine. We can create a job magnet to rival any major city. At the same time, we can reduce taxpayer cost for maintenance of highway upkeep, make transportation and housing fairer, and improve air quality and public health. Yes, we can be that bold and we can make it happen.

Turning to the System Level Analysis and the 7 Concepts presented by INDOT and HNTB.

--In public meetings INDOT and HTNB have removed Concepts 1 and 2 from consideration.

--Concept 3 is a disaster on so many levels it is hard to

I would strongly recommend that the System Level Analysis be put aside for the time being and that the current planning and engineering work for the North Split be halted and put aside, while INDOT immediately move forward with all appropriate measures to 1) stabilize bridges within the North Split that present safety concerns—without expanding those bridges or the lanes upon them—and 2) address safety concerns raised by “weaving” traffic through speed and signage control measures.

An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.

An alternative to replace existing infrastructure in-kind is considered in the Alternatives Screening Report.

know where to begin. First, it doubles down on the highway planning mistakes of 50 years ago. 50 years ago the interstates cut up neighborhoods and business communities and divided them. Concept 3 would now wall them off and install a LA-style interstate system on top of it all. More lanes, more traffic, more congestion, more pollution, more noise, more vibration, much more graffiti, not to mention the series of elected officials who will be voted out of office as the public revolts after having to go through so much pain to achieve only a 10% improvement in congestion in the morning and 6% in the evening for up to \$1.6 Billion spend of hard earned taxpayer dollars. Think the public won't notice? Central Indiana is the No. 1 media market in the State with 4 active and competitive broadcast tv stations and 2 widely read print news outlets, and 3 widely read online news outlets, all looking for conflict stories for what will be at least 3 election cycles through the course of this project's first phase alone.

--Concept 4 is better than Concept 3 but not by much. Unless it is combined with some capping at some streets where retail commerce can help bridge the commerce and connectivity gap, you will have improved sightlines and traffic flow during the rush-half-hour but do nothing to improve urban connectivity or address any of the environmental problems that come with interstates, particularly in dense urban areas. Most importantly, the State will have failed to take advantage of the massive opportunities that the reconstruction of the interstates could have given the State.

--Concept 5. This concept is INDOT's and HNTB's interpretation of "boulevards" but they designed boulevards that are guaranteed to fail. They have really designed limited access highways in a dense urban core. This concept has to be re-designed, but once that takes place it is the concept that begins to launch massive economic opportunities available to the State and City. It is the concept that can transform the urban core into a thriving, livable, economically diverse and appealing area that will bring new commerce and creative financing opportunities to the overall project. It is this concept that deserves the most future attention.

--Concept 6. This concept too deserves further attention, even though it appears to be designed to fail. The depressed thoroughways would help alleviate traffic on the surface corridors and allow thru traffic not to congest traffic destined for downtown. Even with its challenges, it is far better than Concept 3.

--Concept 7. I'm not sure why concept 7 was included. It

<p><i>doesn't seem to solve any of INDOT's stated problems, it costs a lot, and given the state of existing development along its path, it seems highly unlikely that this plan could ever move forward.</i></p>	
Indianapolis Metropolitan Planning – Jen Higginbotham – June 6, 2018	
<p><i>I have the following comments regarding the system-level report. They are the same ones I mentioned this morning, but with more detail.</i></p> <p>Comments on System-Level Analysis:</p> <p><i>What is the actual crash rate for downtown interchanges, how do they compare to the rest of the interchanges in the State of Indiana, and also break that down by fatalities/serious injuries/other.</i></p> <p><i>Please indicate the actual rated lifespans of each bridge in downtown system, according to whatever are the most recent inspections for each bridge in downtown (North Split, northwest, southeast, each leg, etc.)</i></p> <p><i>Please evaluate the level of “through-traffic” in downtown to supplement the data for the tunnel/depression options. By that I mean traffic coming from north of 30th street, south of Raymond, east of Rural, and west of West Street, going through downtown without stopping downtown, and coming out one of the other points mentioned. That would give a better idea of how much traffic could be reasonably tunneled without having to use a lot of ramping downtown (e.g. finding out what it would look like to have local traffic above, accessing surface streets before getting downtown, keeping through traffic below, and minimizing the number of / locations of exit/on ramps).</i></p>	<p><i>Questions in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p>
Historic Urban Neighborhoods of Indianapolis – Marjorie Kienle – June 6, 2018	
<p><i>Indianapolis, Indiana June 5, 2018 The Historic Urban Neighborhoods of Indianapolis (HUNI) appreciates INDOT's response to the public's concern for a need for alternate solutions for the Northsplit. However, this system analysis does not go far enough to be able to appropriately select the best solution for transportation infrastructure within its vibrant urban context.</i></p> <p><i>At the INDOT Consulting Party meeting on Friday, January 26, 2018, HUNI urged INDOT to join with the City of Indianapolis and Metropolitan Planning Organization to work together on a policy directive to shape future investments in the interstate system through downtown. We have consistently advocated for the development of technically and economically feasible alternatives that more holistically address community development and quality of life opportunities. Those include economic development, environmental and social</i></p>	<p><i>Some questions in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p> <p><i>Responses to North Split questions are provided below.</i></p> <p><i>HUNI recognizes the safety and aging infrastructure issues and is requesting that INDOT move forward immediately by stabilizing, not expanding, existing structures and pavements. Reduce weaving impacts through speed control measures.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will</i></p>

<p><i>justice considerations, and historic preservation (the route slices through several National Register and local IHPC districts) in addition to traffic management (in conjunction with mass transit, bike trails, and other modes of transportation). Our intention has not been adversary to the existing process, but rather to facilitate a creative solution that meets INDOT's objectives, accelerates a bold vision for a world-class City, and maintains Indianapolis as the primary economic generator for the State of Indiana.</i></p> <p><i>HUNI recognizes the safety and aging infrastructure issues and is requesting that INDOT move forward immediately by stabilizing, not expanding, existing structures and pavements. Reduce weaving impacts through speed control measures. Extend the life of the infrastructure for 3-5 years. In tandem with these steps, HUNI encourages INDOT to create a partnership between the Rethink 65/70 Coalition, City, State, and MPO for development of a comprehensive plan that includes community considerations of economic development and quality of life, in addition to moving traffic. Maintain the partnership to implement the plan in logical phases.</i></p> <p><i>Proceeding now with a permanent solution to the Northsplit clearly puts the cart before the horse and can perpetuate the mistakes of the past</i></p>	<p><i>address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p> <p><i>An alternative to replace existing infrastructure in-kind is considered in the Alternatives Screening Report.</i></p>
<p>Rethink 65/70 Coalition – Marsh Davis – June 6, 2018</p>	
<p><i>On behalf of the Rethink 65/70 Coalition, I submit the following statement in response to Indiana Department of Transportation's "System-Level Analysis for Downtown Interstates," released on May 2, 2018. The Rethink 65/70 Coalition proposes that INDOT modify its current Downtown Indianapolis Interstate Inner Loop reconstruction process as follows:</i></p> <p>1. Near Term Stabilization and Safety Interventions <i>Move forward immediately by stabilizing, not expanding, existing structures and pavements. Reduce weaving impacts through speed control measures. Extend the life of the infrastructure for 3-5 years.</i></p> <p>2. Long Term Plan <i>Form a partnership between the Rethink 65/70 Coalition, City, State, and MPO for development of a comprehensive plan that includes community considerations of economic development and quality of life, in addition to moving traffic. Maintain the partnership to implement the plan in logical phases. The coalition believes this approach will result in community buy-in for predictable project funding and implementation</i></p>	<p><i>Some questions in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p> <p><i>Responses to North Split questions are provided below.</i></p> <p>1. Near Term Stabilization and Safety Interventions <i>Move forward immediately by stabilizing, not expanding, existing structures and pavements. Reduce weaving impacts through speed control measures. Extend the life of the infrastructure for 3-5 years.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p>

process.

Details of the Position Statement

1. Implement near-term stabilization measures to extend the life of existing critical structures and pavements as necessary for near-term public safety.

a. Stabilize structures and pavement to ensure near-term public safety. Stabilization does not include expansion which is disallowed by provisions of the NEPA until final project environmental approval is secured.

b. Address operational safety issues associated with high-speed weaving/merging movements through the North Split as a component of temporary maintenance-of-traffic (MOT) measures to be employed during the near-term stabilization work and maintained through reconstruction work.

c. Preserve existing facilities to provide reasonable time for planning, design and implementation of a permanent and appropriate reconstruction plan based on an overall community-based Inner Loop system plan.

2. Develop a robust, comprehensive, community-wide plan in partnership between the Rethink 65/70 Coalition, City of Indianapolis, State of Indiana and the MPO to facilitate a community-led planning and design process that results in a consensus-based long-range strategy and plan for the Downtown Indianapolis interstate system, with the following planning considerations and design parameters:

a. Full integration of inner loop reconstruction with the community transportation grid, interfacing local infrastructure initiatives, innovative concepts that address regional and local mobility and logistics patterns, and urban design factors consistent with context sensitive solutions [CSS].

b. Full consideration of FHWA-supported innovative funding mechanisms based on economic development potential associated with those concepts.

c. Sharing of traffic modeling and other technical data for development of the plan and its transportation demand management.

d. Consideration of plans for re-routing the CSX tracks that currently cross downtown and impact inner loop interstate configuration.

1. The North segment of the Inner Loop's east leg

An alternative to replace existing infrastructure in-kind is considered in the Alternatives Screening Report.

<p><i>(between Washington Street and the North Split) was originally configured as a raised section with overpasses over the railroad.</i></p> <p><i>2. The CSX tracks have become a heightened public safety and congestion issue due to recent massive increase in train size and frequency resulting from and recent upgrading of the Louisville and Indiana Railroad trackage from southern Indiana to accommodate heavy rail freight demand.</i></p> <p><i>3. It is therefore prudent, given the changed conditions that now impact downtown in general and the Near Eastside in particular, to revisit previous studies for abandoning existing downtown trackage and rerouting that traffic to the existing perimeter Belt Railway corridor. This should occur prior to investing in what could be unnecessary infrastructure in this section of the inner loop interstate.</i></p> <p><i>e. Amend the current MPO Transportation Improvement Plan (TIP) to reallocate North Split reconstruction funds (\$35M± State/\$315M± Federal) towards a more comprehensive first phase project between the logical termini of the North Split and West Street interchanges, a complete system.</i></p> <p><i>1. Current funding can be reallocated to other important projects while a longer-term funding stream appropriate to the scale of the downtown interstates is identified. That major portion (90%) of long-term funding is a necessary component of a Federal Infrastructure bill that is forming behind the scenes in advance of the post-mid-term election of a new congress.</i></p> <p><i>2. The Coalition will support impending Federal legislation for an appropriate National Infrastructure funding bill. There is growing national consensus for that, with active support from multiple states and DOT's. Andre Carson is a member of the Transportation Committee and can be an important ally in that effort. It hinges on developing an indexed Federal fuel tax similar in concept to that developed by Indiana.</i></p> <p><i>3. The other funding component currently being studied by Indiana, and that should be completed before final decision on Inner Loop plans are developed, is implementation of a tolling strategy that could include truck-only lanes, for a significant inner loop traffic component.</i></p>	
Cottage Home Neighborhood – Crystal Rehder – June 6, 2018	
<p><i>As president of the Cottage Home Neighborhood Association, I want our neighborhood to be on record that we oppose INDOT's recommendation for the I-65/I-70 highway project and insist on an independent study of alternatives.</i></p>	<p><i>Comments in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p>

<p><i>Our reasons for dissent of this project include:</i></p> <p><i>-Harmful impacts to the economy: property values will decrease and business will be negatively affected downtown.</i></p> <p><i>-Damage to the environment and living space: the walls that support the widened highways will increase traffic noise and reflect and increase train noise in several areas; increased traffic will bring more pollution and trash; the longer tunnels will further divide the city making it less walkable.</i></p> <p><i>-Shortsighted commitment to one mode of transportation: the metropolitan area would be much better served by better public transportation and more integrated support for bicycle riders and pedestrians (including eliminating awkward and dangerous intersections around approach ramps for riders and walkers).</i></p> <p><i>Work on the project has not come close to giving the impression of transparency or fairness. The public meeting regarding the "alternatives analysis" lacked direct communication; question and answer sessions are important for such a significant project. The studies of alternatives are unconvincing and suggest bias. The claim that studies should target only the north split are undercut by the state bringing in people from the donut counties. The results of comparative studies of alternatives use questionable assumptions. This project fails to answer criticisms of the original highway development a half century ago.</i></p> <p><i>I request that INDOT take the time to research and consider alternative solutions to this project by initiating an independent study. Given the adverse consequences on downtown living that was the result of the original highway development a half century ago, it is the obligation of the State of Indiana to focus on a broader vision that goes beyond vehicular travel.</i></p>	
<p>St. Joseph Historic Neighborhood System Level Analysis Comments – Peter Haupers-June 7, 2018</p>	
<p><i>St. Joseph Historic Neighborhood Association Representatives attended all three May meetings related to the INDOT North Split Project (the Project) – the May 3rd CAC Briefing, the May 21st CAC Meeting #2 and the May 21st Consulting Party Meeting with equal disappointment over HNTB's System Level Analysis (the Study). We intend to dispute the notion that this Study was conducted in response to public comments, because it did not address any of the St. Joseph Historic District concerns. Our current concerns about the Study are segmented into three categories – (A) what was studied, (B) how it was studied, and (C) how the Study will be used.</i></p>	<p><i>Comments in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p>

A) **What was studied in the System Level Analysis:** We believe the Study to be fundamentally misguided with crippling scope limitations to the extent where the information is dangerous for public consumption.

a. **Scoping limitations:** HNTB stated that this Study was conducted at a higher level in order to analyze concepts that could develop into alternatives. A higher level analysis should have a wider scope, not a smaller scope. Omitting economic and environmental impacts from the scope shows that the Study's evaluation criteria were selectively chosen by a non-independent team with expertise in only in traffic based metrics.

b. **"In Response to Public Comments":** We dispute the notion that this Study was conducted in response to public comments. The public comments asked for a diverse panel of experts to conduct a comprehensive analysis that considers more than just cost, time of construction, and traffic flow. INDOT responded by commissioning a \$650,000+ Study by the least independent group possible that almost exclusively studied cost and traffic.

c. **Completed behind closed doors:** No opportunities for public input on the evaluation criteria, nature of the study, or participants in the study were granted by INDOT. This study was done behind closed doors and was perhaps the least transparent action by INDOT on this Project to date.

B) **How the System Level Analysis studied the Indianapolis interstate design:** Without public involvement as mentioned above, the basis of the Study was unhelpful in addressing the core issues involved with this Project.

a. **No element of forecasting:** It appears shortsighted to preclude any notion of forecasting in the Study. We expected to see this in the Study and used to support INDOT's unwavering desire to expand the North Split due to projected increased traffic volume over time. If you are about to build a highway to last another 50 years, why not look ahead using HNTB's state of the art modeling system?

b. **Basic parameters omitted critical elements:** Performance, Cost, and Impacts sound like excellent criteria but are actually all based on INDOT preferred metrics that originate from either cost, time of construction, or traffic flow. There is no evaluation of how the concepts would alter a nationally recognized historic district. There is no mention of the financial/economic implications of the altered commerce that would occur as a result of the concepts. And most importantly, extremely limited considerations as to the impact on quality of life for surrounding neighborhoods. We understand that INDOT is not charged with these assessments, but could have at least organized a structured handoff of the Study for these omitted elements to a responsible party.

*c. **High deviation in cost estimates:** Concepts 4, 6, and 7 have cost ranges of nearly \$1B or more with Concept 6 at a range of \$2.2B. For such an expensive study, we would think this could be a little more specific.*

*d. **No recommendations, but strong suggestions:***

Although the Study does not conclude or provide any sort of recommendation. We would have expected to see a recommendation for additional studies that consider more than the standard INDOT metrics that always tie back to cost, time of construction, and traffic flow.

*C) **How the System Level Analysis will be Used:** We are left to wonder how the System Level Analysis will impact the North Split section and who will further the Study beyond HNTB's "basic parameters".*

*a. **Ambiguous use:** John Myers (HNTB) stated that this study will be "available to the Project team" during the planning phases. That means INDOT can selectively choose to use elements of a study that considered only criteria INDOT selected in the first place.*

*b. **Highlights only negative elements of certain alternatives:** We found it disappointing that the criteria selected appeared to highlight only the negative aspects of certain concepts. These include times of construction in excess of 5 years, red indicators for additional delays, and the enormous aforementioned cost swings.*

*c. **Moving forward with the North Split section:** We also found it odd that the Study that prompted three meetings in one month is not being used to guide the most critical section of the Project – the North Split. It is the namesake of the Project, but it is not clear how this Study ties into the North Split section.*

*d. **Splitting the Project into phases:** Similar to our concerns over the undesirable design/build approach, there is an element of the planning that is meant to split this*

Project into sections for the sole benefit of circumventing regulatory requirements. This approach should be better explained at future meetings.

*e. **No input from Commissioner McGuinness:** We noticed that Commissioner McGuinness did not attend any of the three May meetings. In fact, no INDOT representative addressed us at the May meetings. Is it too much to ask for INDOT leadership to explain the current direction of the process? We would like to hear from INDOT executive leadership at future meetings.*

*f. **Handoff of the Study to other parties:** INDOT commissioned this Study and expects another organization to pick up where they left off. INDOT should have been clear and upfront that they intended to only study cost, time of construction, and traffic flow; and then coordinate a handoff with a party that has the ability & competence to study the aspects the public suggested.*

*g. **More study needed:** Given the scope limitations,*

<p><i>INDOT traffic-specific metrics, and lack of public involvement in the Study, we ask that any future studies be more transparent. John Myers (HNTB) stated that more study was needed, but HNTB failed us in coordinating a means to another, more comprehensive study.</i></p> <p><i>In conclusion, the System Level Analysis fails to address the concerns of impacted neighborhoods [and historic districts]. Before we move forward with the North Split section, we implore INDOT to commission and/or support further studies in collaboration with responsible parties such as the City of Indianapolis. Stabilize the bridges and address the safety concerns in the meantime. This needs more than just traffic experts & engineers, it needs independent professional experts in the fields of city planning, economics, tax revenues, zoning, air quality, public health, public transportation, and job creation at a minimum. It is both frustrating and disappointing to observe this Project move forward based on such limited information. INDOT is at a critical juncture with this Project – either proceed with the planning process based on non-independent limited scope studies, or make a concerted effort to find an optimal solution. Choosing to commission a more comprehensive independent study while stabilizing the bridges is the responsible option for Indianapolis.</i></p>	
<p>Cottage Home Neighborhood – Jim Jesse – June 7, 2018</p>	
<p><i>I am a resident of Cottage Home neighborhood on the near east side of Indianapolis and I oppose INDOT's recommendation for the I-65/I-70 highway project.</i></p> <p><i>My reasons for dissent of this project include:</i></p> <ul style="list-style-type: none"> •<i>Harmful impacts to the economy: property values will decrease and business will be affected downtown.</i> •<i>Damage to the environment and living space: the walls that support the widened highways will increase traffic noise and reflect and increase train noise in several areas; increased traffic will bring more pollution and trash; the longer tunnels will further divide the city making it less walkable.</i> •<i>Shortsighted commitment to one mode of transportation: the metropolitan area would be much better served by better public transportation and more integrated support for bicycle riders and pedestrians (including eliminating awkward and dangerous intersections around approach ramps for riders and walkers).</i> <p><i>Work on the project has not come close to giving the impression of transparency or fairness. Meetings have cursory affairs that lack direct communication; question and answer sessions are important for such a significant project. The studies of alternatives are unconvincing and</i></p>	<p><i>Comments in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p>

<p><i>suggest bias. The claim that studies should target only the north split are undercut by the state bringing in people from the donut counties. The results of comparative studies of alternatives use questionable assumptions. This project fails to answer criticisms of the original highway development a half century ago.</i></p> <p><i>I request that INDOT take the time to research and consider alternative solutions to this project. Given the adverse consequences on downtown living that was the result of the original highway development a half century ago, it is the obligation of the State of Indiana to focus on a broader vision that goes beyond vehicular travel.</i></p>	
North Square Neighborhood Association. – Jordan Ryan– May 22, 2018	
<p>For the June 7th public comment period - should those comments go to HNTB or to INDOT? What is the preferred email or web address?</p>	<p>The best email address to use is info@northsplit.com. Thanks for checking.</p>
Jordan Ryan – North Square Neighborhood Association -June 7, 2018	
<p><i>The North Square Neighborhood Association (NSNA) supports a Do No Harm Strategy regarding the I-65/I-70 North Split Interchange Reconstruction Project. NSNA believes INDOT should address the public safety issues and fix bridges now, but INDOT should not move forward on the interstate plan until proper independent review studies regarding the economic impact, quality of life impact, and connectivity impact are addressed and then and only then will we be capable of making a truly informed decision on which concepts would be best.</i></p> <p><i>NSNA urges that INDOT, the State of Indiana, and the Metropolitan Planning Organization work with the City of Indianapolis to ensure that downtown residents and businesses are fully represented in the approved plan for the future reconstruction of interstates I-65 and I-70, specifically in the downtown area. NSNA supports the exploration of alternative plans that expand upon INDOT's original vision and scope, as well as the use of creative funding tools and innovative partnerships and collaborations in order to enhance our quality of life as a downtown neighborhood that abuts the interstate on our western boundary. The reconstruction plan will set a legacy for another 50 years and we want that to be a positive community-enhancing legacy – a transformative project - that incorporates principles of economic development, multimodal transportation, urban planning, connectivity, environmental sustainability, and historic preservation. Downtown neighborhoods are not exit ramps. We urge a creative solution, such as those offered in peer cities. We ask for particular consideration to economic development opportunities that would redevelop multiple acres of downtown property that could ultimately generate more property taxes and attract new businesses and jobs. These strategies could reconnect our</i></p>	<p><i>Some questions in this submittal relate to the System-Level Analysis. No further system-level planning is being conducted as part of the North Split project. System-Level Analysis documentation and related comments and questions are retained in the project record for use in future studies of the downtown interstate system.</i></p> <p><i>Responses to North Split questions are provided below.</i></p> <p><i>NSNA believes INDOT should address the public safety issues and fix bridges now, but INDOT should not move forward on the interstate plan until proper independent review studies regarding the economic impact, quality of life impact, and connectivity impact are addressed.</i></p> <p><i>An Alternatives Screening Report for the North Split project was released for public comment on September 28, 2018. It identifies a preliminary preferred alternative that will address the bridge and pavement infrastructure needs as well as the top four safety concerns in the interchange, while minimizing impacts to the community. A Consulting Parties meeting will be held on October 17, 2018 to discuss the Alternatives Screening Report.</i></p> <p><i>An alternative to replace existing infrastructure in-kind is considered in the Alternatives Screening Report.</i></p>

<p><i>neighborhood, along with Fountain Square, to Fletcher Place, righting the wrong when the original interstate came through against our neighborhood's wishes and cut us off of downtown, causing an economic downturn we are finally recovering from. In addition, we remind the policymakers that there is an ideological dissonance of pursuing bigger highways through downtown after a majority of city residents passed a mass transit referendum in 2016.</i></p>	
<p>Do I need to send a separate comment for the Section 106?</p>	<p>No, if you have the same comments you don't need to send a separate letter for Section 106.</p>