



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

August 9, 2019

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)
IDNR DHPA No. 21534
Section 106 Update Memo #5 and Historic Property Effects Report

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 (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; 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 downtown Indianapolis, 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.

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).

Ms. Mandy Ranslow, FHWA Liaison/Program Analyst from the Advisory Council on Historic Preservation, should be added to the list of consulting parties for processing the dual review submission. In addition, Mr. Mark Godley has replaced Mr. Pete Haupers as the St. Joseph Historic Neighborhood Association representative. Contact information for both are included in Attachment A.

Historic Property Effects Report

A Section 106 Historic Property Effects Report has been prepared for the project. The report analyzes and recommends a Section 106 effect finding for each historic property. The Historic Property Effects Report 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 document and respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. If you prefer a hard copy of this material, please respond to this email with your request within seven (7) days.

Historic Property and District Boundary Map Changes

Project maps have been revised in order to more precisely and accurately depict the boundaries of historic properties. Some mapped historic property and district boundaries shown in the Historic Property Effects Report may appear slightly different since the publication of previous historic property reports. For instance, the depiction of the southwest corner of the Old Northside Historic District on the maps has been slightly revised to better line up with the existing I-65 right-of-way line, which is referenced in the verbal district boundary description of the National Register of Historic Places nomination form for the district

The boundaries for the individually listed historic properties were revised slightly to more accurately depict the existing parcel boundaries.

Consulting Party Comments and Responses

Attachment B includes comments received from Consulting Parties from March 20, 2019 to July 19, 2019 regarding Section 106 Update Memo #3, Memo #4, and the Phase Ia Archaeological Report. Responses are provided with each comment. Comments and responses are grouped by organization and the order they were received.

Consulting Parties Meeting/WebEx

We would like to invite you to participate in a Consulting Parties Meeting on August 29, 2019 at the Ivy Tech Community College Culinary and Conference Center, 2820 N. Meridian St., Indianapolis, Indiana 46208, from 4:30 to 6:30 p.m. Indianapolis time. Parking is free in the Ivy Tech Community College parking lot adjacent to the building. You may participate in person or by WebEx and conference call using the information below. At this meeting, we will discuss effects to historic properties within the Area of Potential Effects and next steps in the Section 106 consultation process.

When it's time, join your Webex by clicking the link below:

<https://hntb.webex.com/mw3300/mywebex/default.do?siteurl=hntb&AT=HM&ST=SUCCESS&MK=740056577&rnd=0.48724542869945286>

Meeting number (access code): 740 056 577

Meeting password: dSwktr*6

Join by phone

+1-415-655-0002 US Toll

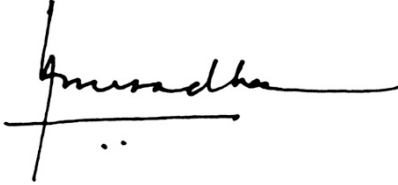
+1-855-797-9485 US Toll free

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,



Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

Attachment A - Consulting Parties List & Contact Information
Attachment B - Consulting Party Comments & Responses
Historic Property Effects Report

Distribution List:

Chad Slider, IDNR-Division of Historic Preservation and Archaeology
Wade Tharp, 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
Brad Beaubien, 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
Mark Godley, 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
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
Mandy Ranslow, Advisory Council on Historic Preservation
Sandy Cummings, Property Owner
Denise Halliburton, Old Near Westside/Ransom Place
Diane Hunter, Miami Tribe of Oklahoma

Section 106 Update Memo #5

Attachment A

**Consulting Parties List
& Contact Information**

I-65/I-70 North Split Interchange Reconstruction
 Des. Nos. 1592385 & 1600808
 Consulting Parties List (7/25/2019)

| Organization | Contact Name | Title | E-Mail |
|--|---------------------|---|--|
| IDNR-Division of Historic Preservation and Archaeology | Chad Slider | Deputy State Historic Preservation Officer | CSlider@dnr.IN.gov |
| IDNR-Division of Historic Preservation and Archaeology | Wade Tharp | Archaeologist | WTharp1@dnr.IN.gov |
| 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 | Garry Chilluffo | | garry@chilluffo.com |
| Historic Urban Neighborhoods of Indianapolis/Indiana Landmarks | Chad Lethig | Secretary/Indianapolis Preservation Coordinator | clethig@indianalandmarks.org |
| Indianapolis Historic Preservation Commission | Meg Purnsley | Administrator, Indianapolis Historic Preservation Commission/City of Indianapolis | Meg.Purnsley@indy.gov |
| Indianapolis Department of Metropolitan Development | Brad Beaubien | Principal Planner | Brad.Beaubien@indy.gov |
| Indianapolis Department of Public Works | Melody Park | Chief Engineer | Melody.Park@indy.gov |
| Old Northside Neighborhood Association | Garry Elder | President | eldergarry@sbcglobal.net |
| Old Northside Neighborhood Association | Nancy Inui | | nsinui@ameritech.net |
| Old Northside Neighborhood Association | Travis Barnes | | travis@hoteltangowhiskey.com |

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 & 1600808
Consulting Parties List (7/25/2019)

| Organization | Contact Name | Title | E-Mail |
|--|------------------------|---|--|
| Benjamin Harrison Presidential Site | Charles A. Hyde | President and CEO | chyde@bhpsite.org |
| St. Joseph Historic Neighborhood Association | Mark Godley | President | mgodley@chestnut.org |
| Chatham Arch Neighborhood Association | David Pflugh | President | canaindy@gmail.com |
| Lockerbie Square People's Club | Jeffrey Christoffersen | | jeff@thechristoffersens.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 |
| Cottage Home Neighborhood Association | Crystal Rehder | President, Cottage Home Neighborhood Indianapolis | cottagehomeneighborhood@gmail.com |
| Cottage Home BOD | Jim Jessee | | jamesjessee102@gmail.com |
| Massachusetts Avenue Merchants Association | Meg Storrow | | storrow@storrowkinsella.com |
| Mayor's Neighborhood Advocate, Area 10 | Ruth Morales | | ruth.morales@indy.gov |
| Hendricks Commercial Properties | Isaac Bamgbose | Vice President - Asset Management | Isacc.Bamgbose@hendricksgroup.net |
| 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 |

I-65/I-70 North Split Interchange Reconstruction
 Des. Nos. 1592385 & 1600808
 Consulting Parties List (7/25/2019)

| Organization | Contact Name | Title | E-Mail |
|---|-----------------------------|------------------------------------|--|
| Property Owners | 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 |
| Interstate Business Group | Paul Knapp | | pknapp@yandl.com |
| National Trust for Historic Preservation | Betsy Merritt | Deputy General Council | emerritt@savingplaces.org |
| Advisory Council on Historic Preservation | Sarah Stokely | Program Analyst | sstokely@achp.gov |
| Advisory Council on Historic Preservation | Mandy Ranslow | FHWA Liaison/Program Analyst | mranslow@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 |
| | | | |
| Tribes | | | |
| Miami Tribe of Oklahoma | Diane Hunter | THPO | dhunter@miamination.com |

Section 106 Update Memo #5

Attachment B

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 B.1: I-65/I-70 North Split Project (Des. Nos. 1592385 & 1600808) – Consulting Party Comments & Responses from March 20, 2019 to July 19, 2019 to Section 106 Update Memos #3, #4, and the Phase Ia Archaeology Report

| Comment | Response |
|---|--|
| Indiana Department of Natural Resources – Chad Slider – April 9, 2019 | |
| <p>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 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 of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed INDOT’s letter memo with attachments received on March 20, 2019.</p> <p>Thank you for providing us with an updated consulting/interested parties list and your permanent traffic change analysis, tables, and maps for consideration. It’s our understanding that some modifications have been made to preferred Alternative 4C to minimize map closures and allow for greater interstate access; however, some permanent changes to traffic on local streets are anticipated due to diversion. Generally speaking, we believe that increases in vehicular traffic need to be considered in planning projects that could potentially affect cultural and historic properties. We appreciate the level of thought and analysis you have expended in trying to quantify if there would be permanent impacts outside of the currently defined area of potential effects as a result of this undertaking. We have carefully read your conclusions based upon traffic data and modeling applied to the modified Alternative 4C. We agree with your assessment that the minor expected increase in traffic along some arterial streets within primarily commercial areas of the city does not appear to constitute an impact to historic properties, if they exist there, or necessitate an expansion of the undertaking’s area of potential effects in this case.</p> | <p>Thank you for your review and concurrence. If modifications are made to the refined Alternative 4C, changes in assumptions or modeling occurs that could substantially affect traffic patterns, this issue will be revisited.</p> |

| | |
|--|---|
| <p>If, due to further project modifications, changes in assumptions, future modeling or other data, traffic were anticipated to significantly change within commercial, and particularly residential areas as a result of the project, we would recommend revisiting this issue.</p> | |
| <p>Indiana Department of Natural Resources – Christopher A. Smith – July 18, 2019</p> | |
| <p>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 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 of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the above-referenced submission, which arrived under your June 17, 2019, cover letter, and Damian Miller’s (ASC Group, Inc.) June 17, 2019 review request submittal form, all of which received on June 19, 2019.</p> <p>Based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (“NRHP”) within the proposed project area; and we concur with the opinion of the archaeologist, as expressed in the Indiana archaeological short report (Schwarz, 06/13/2019), that no further archaeological investigations appear necessary at the proposed project area.</p> | <p>Thank you for your review and concurrence.</p> |
| <p>If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to INDNR-DHPA within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.</p> | <p>If archaeological artifacts are uncovered during project activities, the INDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p> |
| <p>Garry Chilluffo – HUNI – July 17, 2019</p> | |
| <p>Would you kindly change the St Joe Neighborhood contact please. Pete relocated to Denver.</p> <p>Omit Pete Haupers, haupers3@gmail.com. Add Mark Godley, mgodley@chestnut.org.</p> | <p>The St. Joseph Neighborhood Association consulting party was changed from Pete Haupers to Mark Godley on July 17, 2019.</p> |

North Square Neighborhood Association – Jordan Ryan – July 18, 2019

The North Square Neighborhood Association (NSNA) does not support INDOT's I-65/I-70 North Split Interchange Reconstruction Project proposal. NSNA supports a study by an independent review panel of experts that incorporates genuine economic development and connectivity strategies into the project, with collaboration from the City of Indianapolis.

The current INDOT/HNTB plan does not address our economic development and connectivity concerns, only lane and wall height concerns. This project should go beyond a traffic and maintenance study. NSNA supports the exploration of an alternative plan that expands upon INDOT's current 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 neighborhood, along with Fountain Square, to Fletcher Place and downtown, 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 still recovering from in many ways. 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.

Inner loop options were reviewed in the previously prepared System-Level Analysis of Downtown Interstates and are not addressed in the current study of this individual interchange. The System-Level Analysis analyzed seven concepts for the entire downtown Indianapolis interstate system, including the use of tunnels and boulevards. Estimated costs and traffic operations data are provided for each concept. It was determined that further study would be needed to advance any new system concept and the North Split project should continue due the urgency of need, and the alternatives screening process for the interchange area was initiated.

A study of economic development potential of "excess land" associated the alternatives for the North Split interchange in the Alternatives Screening Report has not been conducted since it would contribute little to the evaluation of the alternatives presented. It is recognized, however, that economic development potential has been a major focus of the Rethink 65/70 Coalition with respect to the full downtown interstate system. In November 2018, the Coalition released an independent economic study developed by ARUP Corporation. The independent study estimated the potential economic benefits of a new concept plan for the downtown interstate system. The study did not evaluate the alternatives for the North Split interchange in the Alternatives Screening Report.

With some adjustment at connecting points, the preliminary recommended preferred alternative for the North Split interchange would not preclude implementation of alternative concepts outside the North Split project area.