



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

March 20, 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)
Section 106 Update Memo #3

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; 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. Please see Attachment A for general location and USGS topographic maps.

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).

Preliminary Preferred Alternative Refinements

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 on September 21, 2018. This Alternatives Screening Report was available for public comment from September 28, 2018 through November 3, 2018.

The Alternatives Screening Report identified Alternative 4c as INDOT's preliminary preferred alternative. As described in the Alternatives Screening Report, Alternative 4c would reconstruct the I-65/I-70 North Split interchange to correct the top four safety concerns as well as replace the bridges and pavement throughout the project area. The top two safety concerns – weaves at the Pennsylvania Street exit ramp and the Delaware Street entrance ramp - would be eliminated in Alternative 4c and the need for pavement widening and retaining walls would be minimized, but some interstate access to and from downtown would be reduced. Westbound traffic from I-70 would no longer be able to exit at the Pennsylvania Street ramp on the north side of downtown, and southbound I-65 traffic would no longer be able to exit to the collector-distributor (C-D) road¹ on the east side of downtown. All other movements in the interchange area would continue to be available.

Based on public feedback after the Alternatives Screening Report was published, INDOT refined Alternative 4c to eliminate the weave at the Delaware Street entrance ramp a different way. Instead of cutting off I-65 access to the C-D road,¹ traffic movements would be restricted at the Delaware Street entrance ramp. In the refined alternative, southbound I-65 traffic would be able to access the C-D road as they do now, but movements from the Delaware Street ramp would only connect with I-70 eastbound. Traffic entering at Delaware Street would no longer have access to I-65 southbound or to the C-D road.¹ Restricting movements at the Delaware Street ramp would affect approximately 1,850 vehicles per day in 2041 compared with approximately 8,500 vehicles per day affected on I-65 with the original Alternative 4c design. The traffic analysis described in this letter and Attachment C incorporates this change.

Permanent Traffic Change Analysis and Section 106 Area of Potential Effects (APE)

The original Section 106 Area of Potential Effects (APE) was submitted to the State Historic Preservation Officer (SHPO) and Consulting Parties for review in the early coordination letter dated September 19, 2017 and was discussed at the Consulting Parties meeting on October 6, 2017.

The APE was later expanded to include the existing right-of-way of several local streets to account for possible temporary heavy truck traffic increases during construction. Although traffic diversions would be temporary, they could be widespread, since all movements through the interchange would be affected at some time during construction. A maintenance of traffic plan has not yet been developed, but it is conceivable that the entire interchange could be temporarily closed at the same time. Based on this worst-case assumption, the proposed APE expansion areas were submitted to the SHPO and Consulting Parties for review in the Section 106 update memo #1 dated January 8, 2018 and were discussed at the Consulting Parties meeting on January 26, 2018.

Since Alternative 4c would restrict some movements that currently exist in the project area, some traffic (including heavy trucks) would be diverted to different areas. None of the interstate ramp restrictions would restrict access to private properties, rather motorists may need to use a slightly different route to get to the properties.

FHWA and INDOT analyzed the possible permanent traffic increases outside of the existing APE and their potential to result in effects to historic properties under Section 106. Traffic decreases were not included in the analysis because no local streets would see complete removal of traffic and a reduction in traffic would not be an adverse effect in the context of Section 106 within this urban area.

The objective was to determine if the Section 106 APE should be expanded further to account for those traffic increases caused by the access restrictions. Based on the analysis in Attachment C, FHWA and INDOT determined that the permanent traffic changes are not anticipated to result in effects to historic properties outside of the APE. Therefore, the APE will not be expanded.

¹ The C-D road provides access to North Street, Michigan Street, Vermont Street, New York Street, Ohio Street, and Fletcher Avenue.

Per 36 CFR 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alternations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

To determine if the APE should be expanded based on permanent changes in traffic patterns, FHWA and INDOT reviewed the Section 106 definition of “effect.” Per 36 CFR 800.16(i), an “effect” is an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register of Historic Places (National Register). INDOT and FHWA acknowledge that traffic diversion could result in other impacts to the community beyond the Section 106 consultation process and will work to minimize these impacts. However, Section 106 requires the focus to be on effects to historic properties. Thus, for the purposes of this analysis, the definition of “effect” is limited to that found in 36 CFR 800.16(i).

From a Section 106 perspective, substantial traffic increases in residential areas would likely be of greater concern than those in more commercial or industrial areas where the presence of traffic would be expected. Lower traffic levels could be an aspect of integrity for historic residential neighborhoods. For this reason, streets within residential areas with forecasted traffic increases were highlighted and discussed in greater detail in Attachment C.

As described in Attachment C, the following factors indicate the potential to alter the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register would be minimal:

- Permanent increases in heavy truck traffic due to access changes at the two ramps in the refined Alternative 4c are forecasted to be small (approximately 11 heavy trucks in the AM peak hour and five heavy trucks in the PM peak hour) and would occur along streets that already include truck traffic. Since these streets already accommodate heavy truck traffic, the likelihood of altering historic properties by adding heavy truck traffic is low.
- The top three affected roadway segments based on increased volume would be Michigan Street, Missouri Street, and Vermont Street. Each of these roadways is an arterial or major collector, designated within the Indianapolis Thoroughfare Plan for carrying high volumes of traffic.
- The perception of change on all affected streets would be minimal. The highest change would be on Michigan Street, with an estimated 2-3 additional vehicles per minute in each lane during the morning peak. Traffic lane volumes on five other segments would increase by 1-2 vehicles per minute per lane during one of the peaks. All other segments would see fewer than one additional vehicle per lane per minute.
- Generally, areas outside the APE that would experience traffic increases with the refined Alternative 4c are office, commercial, entertainment, institutional, educational, multi-family residential (urban apartment or condominium) and industrial uses located in a densely developed downtown setting. Most are not single-family residential neighborhoods.
- Emerson Avenue was the only residential street with a forecasted density over one vehicle/minute/lane in the PM peak hour (1.89 vehicles/minute/lane). Although this may be perceptible, the forecasted traffic would still be under capacity for Emerson Avenue. Emerson Avenue is classified as a major arterial, which is designed to provide relatively high levels of mobility and access for both vehicular and truck traffic.

The I-65/I-70 North Split Project is in the core of downtown Indianapolis. The current APE, as well as the surrounding area for many miles in each direction, is comprised of densely developed urban areas. The existing National Register-listed and National Register-eligible districts and individual properties within the APE are in an urban setting reliant on access to public roadway networks. The setting of these properties is not dependent

upon a serene atmosphere or open landscape such as a historic farmstead. The forecasted traffic increases would occur on streets within a city landscape that are, by nature, designed to carry substantial amounts of traffic. While the change in traffic may be visually and audibly perceptible, views of the passing traffic, even with the increased traffic volumes are consistent with the expected context of urban areas.

An expansion of the APE based on the potential for effects to historic properties is not recommended because the predicted traffic volume increases are not likely to alter the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

Consulting Party Comments and Responses

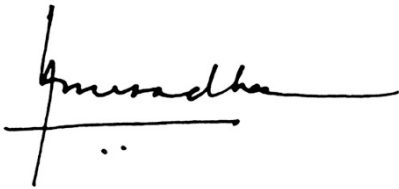
Attachment D includes comments and questions received from Consulting Parties from September 28, 2018 to November 3, 2018 regarding the Alternatives Screening Report and Historic Properties Report Addendum. Responses are provided with each comment. Comments and responses are grouped by organization and the order they were received.

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

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

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

Sincerely,

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

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Attachments:

- Attachment A – General Figures
- Attachment B – Consulting Parties List & Contact Information
- Attachment C – Permanent Traffic Change Analysis, Tables, and Maps
- Attachment D – Consulting Party Comments & Responses

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
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
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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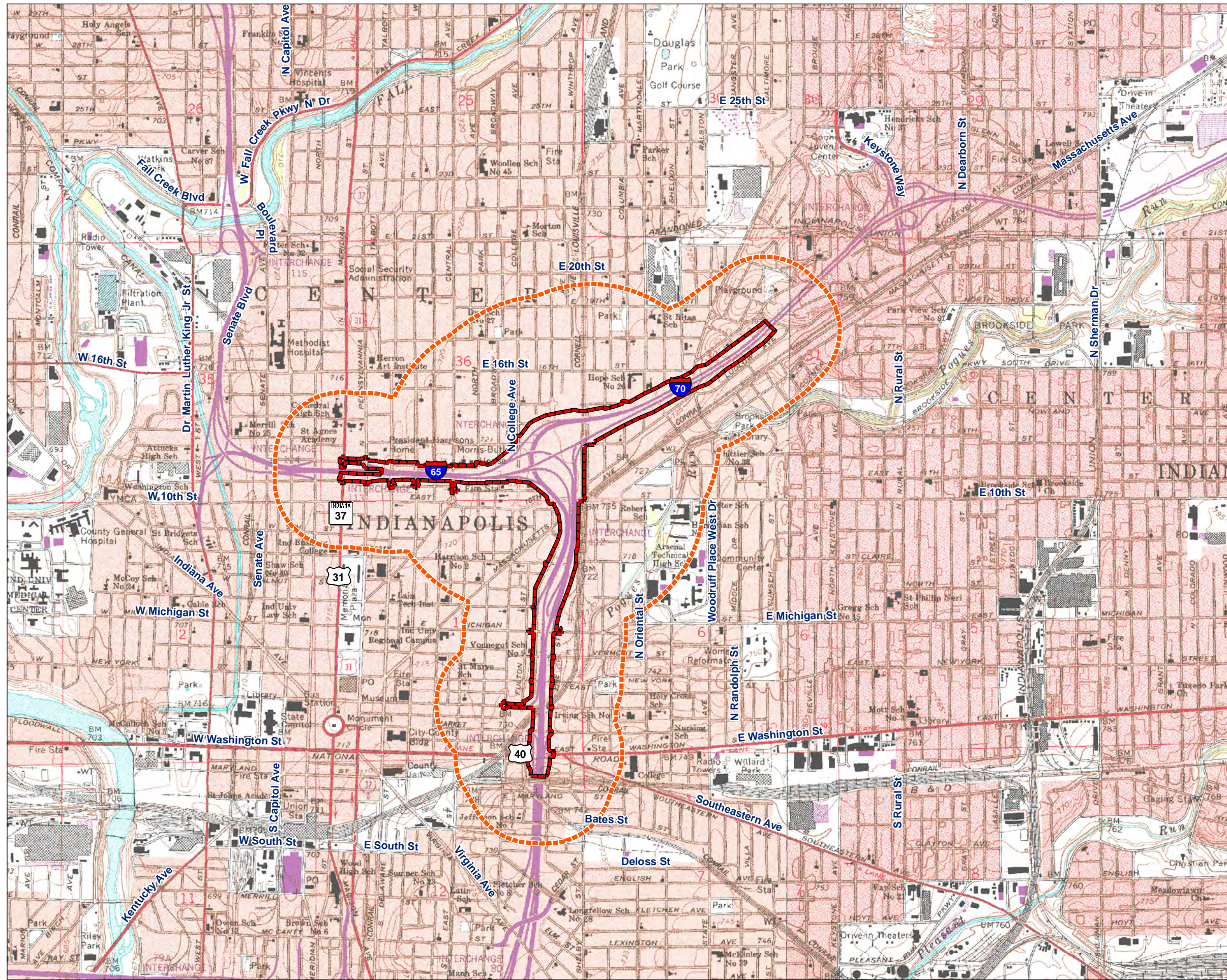
Attachment A

General Figures



General Project Location Map.

Base: ESRI World Street Map



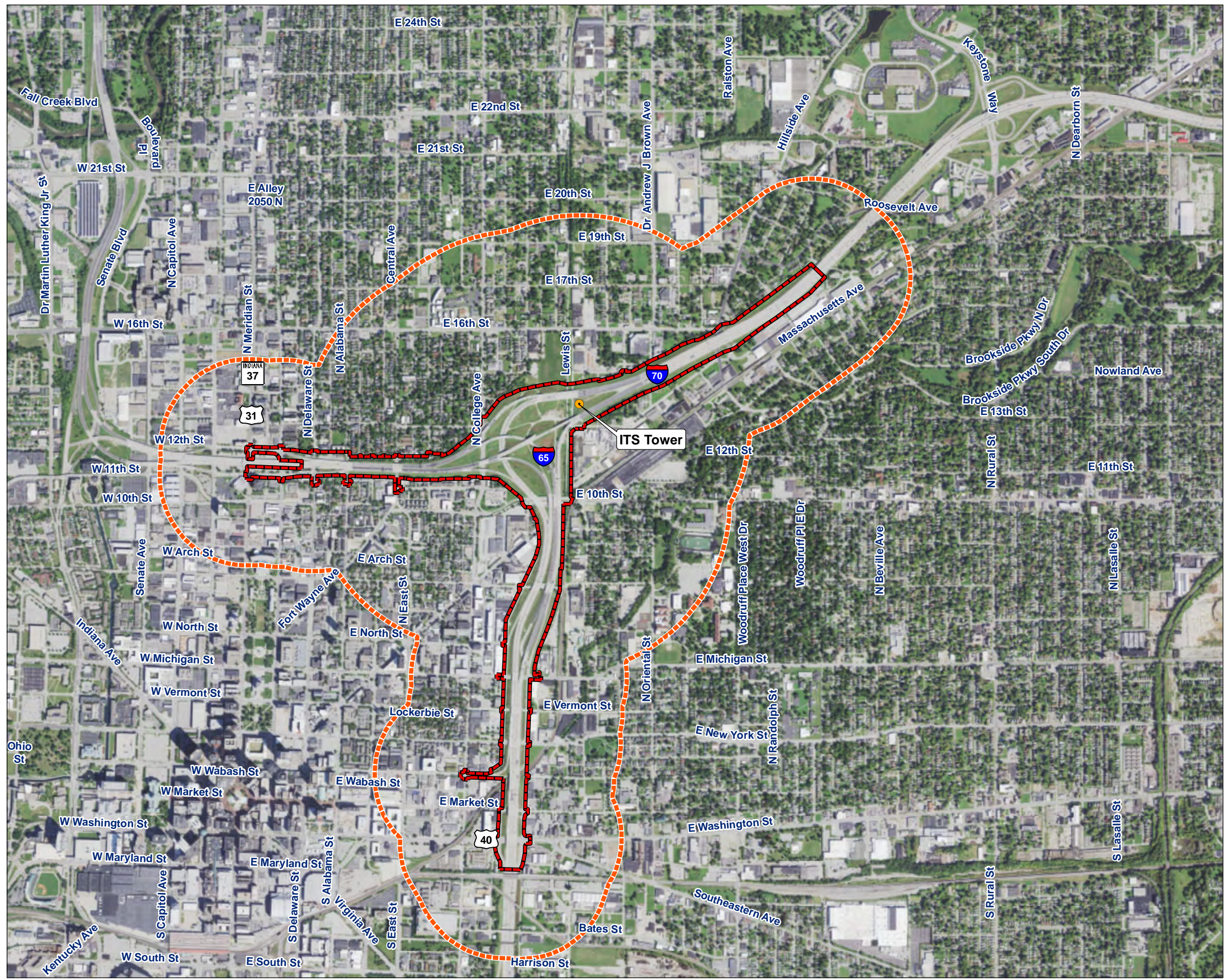
- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project Original APE

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



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

Figure 2
APE on USGS Topographic Map.



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

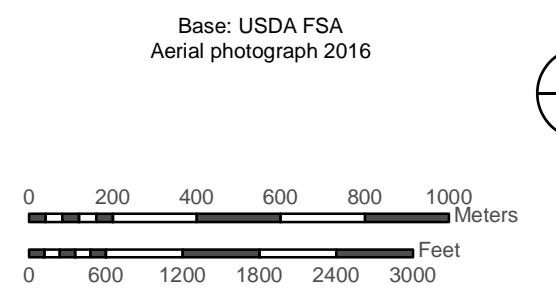
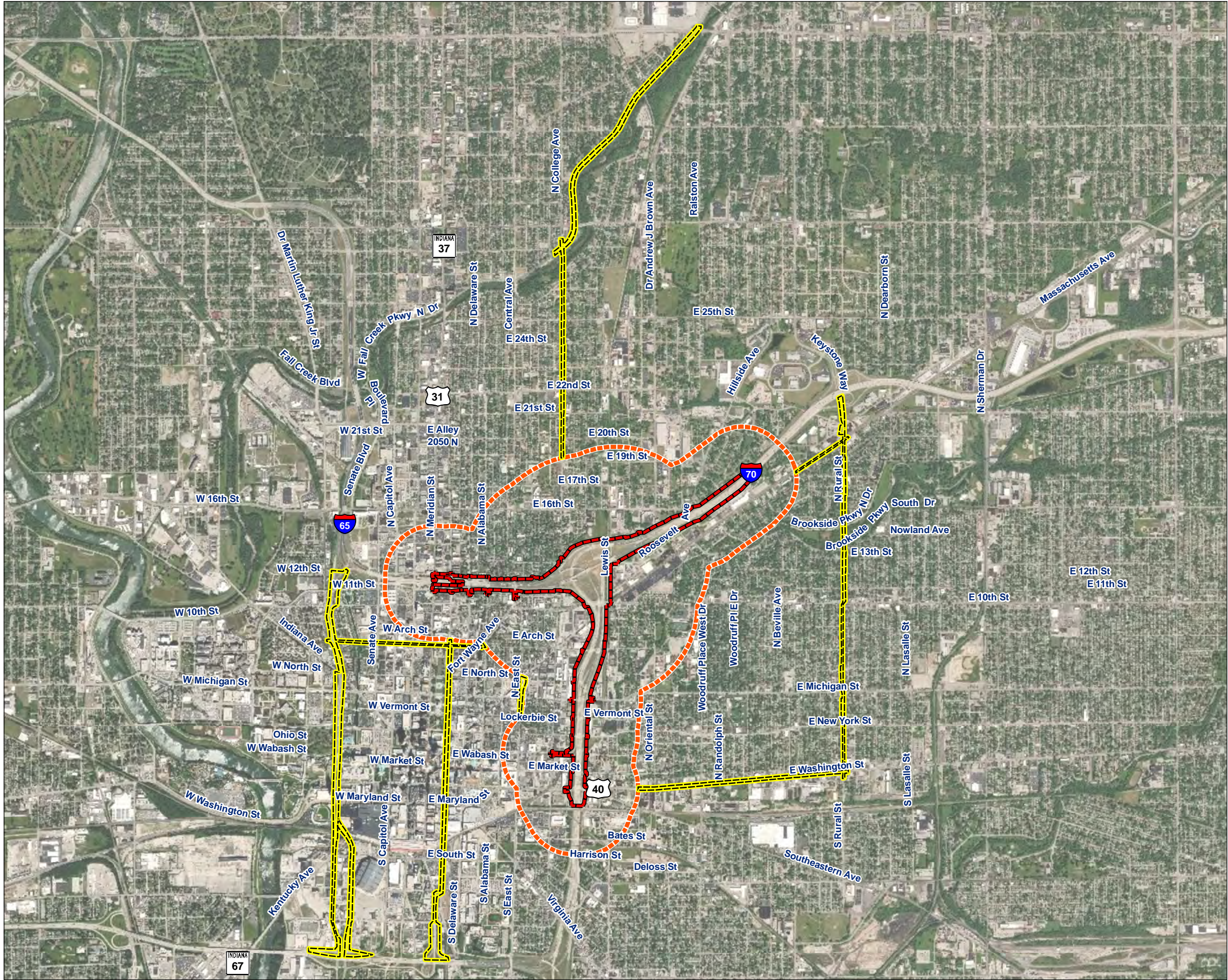
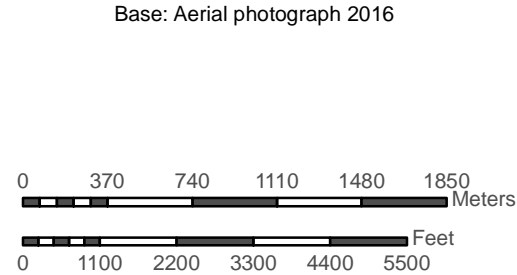


Figure 3
APE on 2016 Aerial Photograph Map.



- Previously Expanded APE (for temporary truck traffic during construction)
- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project Original APE

Base: Aerial photograph 2016



Aerial photograph showing the Expanded APE and project area for the I-65/I-70 North Split Interchange Project Expanded APE, Indianapolis, Marion County (Des. Nos. 1592385 and 1600808).

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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 (1/16/2019)

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 (1/16/2019)

Organization	Contact Name	Title	E-Mail
Benjamin Harrison Presidential Site	Charles A. Hyde	President and CEO	chyde@bhpsite.org
St. Joseph Historic Neighborhood Association	Pete Haupers	President	haupers3@gmail.com
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 Commerical 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 (1/16/2019)

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
St. Joseph Neighborhood Property Owner	Sandy Cummings		
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

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Attachment C

**Permanent Traffic Change Analysis,
Tables, and Maps**

Attachment C
I-65/I-70 North Split Project
Analysis of Traffic Increases on Local Streets

This traffic analysis is provided to support a determination by FHWA and INDOT of whether the Section 106 Area of Potential Effect (APE) should be expanded to account for traffic increases caused by the access restrictions in the refined preliminary preferred Alternative 4c of the I-65/I-70 North Split Project.

The refined preliminary preferred Alternative 4c would not add new through lanes to the transportation network. Based on modeling of the proposed alternative, traffic volume in the study area is not forecasted to materially change from the no-build condition. The changes in interstate accessibility to and from the local street network would, however, result in changes in travel patterns at some locations.

FHWA and INDOT used the I-65/I-70 North Split traffic simulation model as a tool to better understand these changes within the traffic study area for heavy truck¹ traffic and for total traffic. The I-65/I-70 North Split traffic simulation model started with the Indianapolis Metropolitan Planning Organization (MPO) nine-county travel demand model. The North Split model was developed in greater detail in a smaller traffic study area.

The traffic study area is approximately six miles by six miles. It is roughly bounded by the White River to the west, 38th Street to the north, Emerson Avenue to the east, and Raymond Street to the south. The intent in defining a study area this large is to provide a high degree of confidence that traffic changes resulting from changes to the interchange are captured. The model for 2041 includes proposed roadway improvements in the Indianapolis MPO Long Range Transportation Plan and future IndyGo transit projects. Origin-destination trip information is forecasted based on population and employment estimates provided by the Indianapolis MPO in 2017 for base years 2016 and 2035. The greatest traffic changes would likely occur at interchanges and adjacent local roads near the North Split interchange and downtown area within the traffic study area.

Changes in permanent travel patterns were analyzed for the I-65/I-70 North Split Project based on the following parameters:

- All analyses were conducted for peak period conditions. The morning peak hour is from 8:15 AM to 9:15 AM and the afternoon peak hour is from 5:30 PM to 6:30 PM. The peak hours represent worst case conditions with respect to traffic impacts and perception of traffic changes at adjacent properties. Conditions during all other periods would result in less traffic than those reviewed here.
- AM and PM peak conditions for the proposed project for the year 2041 were analyzed and compared to the 2041 no-build condition.

¹ For purposes of this review, heavy trucks are defined by FHWA vehicle classes 8-13, which include single trailer 3-4 axle trucks, single trailer 5-6 axle trucks, and multi-trailer trucks. Pickups, panels, vans, single unit trucks and buses are included in forecasts of total traffic, but they are excluded from the analysis of heavy trucks.

- Only traffic increases on local streets outside the original APE and within the traffic study area were considered in this analysis. Traffic increases outside of the traffic study area are anticipated to be minor and thus would not have the potential to affect historic resources that may be present. Traffic increases within the original APE will be analyzed at a later date as part of the Section 106 effects discussion.
- The previous APE expansion was not considered in this analysis because it only applied to temporary truck traffic, whereas this analysis considers permanent traffic increases caused by both heavy trucks and total vehicles.
- Traffic decreases were not included in the analysis because no local streets would see complete removal of traffic and a reduction in traffic would not be an adverse effect in the context of Section 106 within this urban area.

Heavy Truck Traffic

The I-65/I-70 North Split traffic simulation model provides estimates of truck traffic as well as total traffic. The truck traffic estimate includes single unit trucks and buses in addition to heavy trucks.² Heavy trucks were separated from total truck traffic because they can generate more noise, are physically larger, and have a greater potential for visual, atmospheric, and physical effects. Noise from individual vehicles varies based on a range of factors, including location of and condition of exhaust pipes, but generally, heavy trucks are the loudest vehicles, followed by medium trucks.³ Light trucks generally generate noise similar to cars, and are included in the same vehicle type as cars in the FHWA Traffic Noise Model⁴.

To estimate the number of heavy truck movements, a factor based on heavy truck counts at the two affected ramps was applied to the truck traffic forecast. This step is important because heavy truck percentages vary widely among downtown interstates and ramps, depending on location and the character of nearby land use. Table C.1 shows the forecasted total number of heavy trucks that would be diverted during the peak hours in 2041 due to the change in access with the refined Alternative 4c. Only 11 heavy trucks are anticipated to be diverted during the AM peak hour and only five heavy trucks are anticipated to be diverted during the PM peak hour. Table C.2 shows the forecasted total number of heavy trucks that would be diverted during the entire day in 2041 due to the change in access with the refined Alternative 4c. Approximately 112 heavy trucks are anticipated to be diverted during a 24-hour period.

² In the travel demand model, heavy trucks are defined by FHWA vehicle classes 8-13, which include single trailer 3-4 axle trucks, single trailer 5-6 axle trucks, and multi-trailer trucks. Single unit trucks and buses are included in forecasts of total traffic, but they are excluded from the analysis of heavy trucks.

³ Typical noise from 50 feet away for vehicles at 45 mph: autos – 68 dB, medium trucks – 79 dB, heavy trucks – 84 dB (Source: Noise Pollution Clearinghouse, <http://www.nonoise.org/resource/trans/highway/spnoise.htm>).

⁴ All vehicles having two axles and four tires and designated primarily for transportation of nine or fewer passengers (including light trucks) are considered “Automobiles” in the FHWA Traffic Noise Model. <https://www.fhwa.dot.gov/Environment/noise/measurement/mhrn05.cfm>

Table C.1. 2041 AM and PM Peak Hour Heavy Trucks Diverted		
Traffic Movement	Heavy Trucks (AM)	Heavy Trucks (PM)
I-70 WB to Pennsylvania St.	6	3
Delaware St. to SB C-D	1	1
Delaware St. to SB I-65	4	1
TOTAL	11	5

Table C.2. 2041 Total Daily Heavy Trucks Diverted	
Traffic Movement	Total Heavy Trucks
I-70 WB to Pennsylvania St.	51
Delaware St. to SB C-D	15
Delaware St. to SB I-65	46
TOTAL	112

Table C.3 and Figure C.1 show the forecasted notable 2041 AM and PM heavy truck traffic increases on local street segments as a result of implementing refined Alternative 4c. The greatest increase is five heavy trucks in the PM peak on 21st Street between I-65 and Meridian Street. Four additional heavy trucks are forecasted on Keystone Avenue and on 16th Street during the AM peak, and an additional four heavy trucks are forecasted on Dr. Martin Luther King Jr. Street between 10th Street and 21st Street in the PM peak. Heavy trucks are estimated to increase at other locations by one to two trucks.

Most roadway segments in Table C.3 (as identified in footnotes) are designated as part of the Regional Freight Network in the Regional Freight Plan for the Indianapolis Metropolitan Planning Area⁵ (Figure C.2). Corridors in the Regional Freight Network are responsible for movement of significant numbers of goods through or within the boundaries of the Indianapolis metropolitan region, play a significant role in the economy and overall quality of life of the Indianapolis metropolitan region, or provide access to important intermodal facilities, or freight, retail or visitor destinations. In addition, all these roadway segments, except for 25th Street, are designated as arterials. Arterials are higher in functional classification than other local roadways and are designed to provide relatively high levels of mobility and access for both vehicular and truck traffic (Figure C.3).⁶ 25th Street is classified as a major collector and only showed an increase of one heavy truck in the AM peak hour.

In summary, the increase in heavy trucks is relatively small, and a limited number of routes would be affected, as shown in Figure C.1. Most of the routes affected are designated for truck traffic, as shown in the Indianapolis Regional Freight Plan (Figure C.2), and all but one affected roadway segments are arterials, as shown in Figure C.3. These routes are designed to provide higher levels of mobility than other roadway classifications for all types of vehicles, including trucks.

⁵ <https://www.indympo.org/whats-completed/regional-plans/freight-plans>

⁶ The City of Indianapolis and the Indianapolis MPO follow FHWA guidelines in assigning functional class to area roadways ("Highway Functional Classification: Concepts, Criteria and Procedures," FHWA, 2013). FHWA describes arterials as follows: "Arterials typically are roadways with high traffic volumes and are frequently the route of choice for intercity buses and trucks. The spacing of arterials in urban areas is closely related to the trip-end density characteristics of activity centers in urban areas."

Table C.3. 2041 AM and PM Peak Heavy Truck Traffic Increases

Peak	Roadway Segment	From	To	No-Build Volume	Alt 4c Volume	Maximum Volume Change	Lanes	Volume Rate Change (Veh/Min/Lane)	Functional Classification
AM	Madison Ave.*	Morris St.	Raymond St.	2	3	1	6	0.00	Major Arterial
AM	16th St.*	Senate Ave.	Delaware St.	4	8	4	4	0.02	Minor Arterial
AM	16 th St./Brookside Pkwy South Dr.	Tecumseh St.	Emerson Ave.	1	2	1	4	0.00	Minor Arterial
AM	10th St.*	Porto Alegre St.	Indiana Ave.	8	10	2	4	0.01	Minor Arterial
AM	Pennsylvania St.*	St. Clair St.	South St.	1	2	1	3	0.01	Major Arterial/ Minor Arterial
AM	25th St.	Central Ave.	Keystone Ave.	2	3	1	3	0.01	Major Collector
AM	Keystone Ave.*	38th St.	I-70	9	13	4	4	0.02	Major Arterial
PM	Dr. MLK Jr. St.**	10th St.	21st St.	12	16	4	4	0.02	Major Arterial
PM	21st St.	I-65	Meridian St.	3	8	5	4	0.02	Minor Arterial
PM	Missouri St.*	I-70	West St. split	21	23	2	4	0.01	Major Arterial
PM	Emerson Ave.*	Washington St.	I-70	3	4	1	2	0.01	Major Arterial
PM	10th St.*	University Blvd.	Senate Ave.	4	5	1	3	0.01	Minor Arterial

* Included as part of the Regional Freight Network in the Regional Freight Plan for the Indianapolis Metropolitan Planning Area⁷

**Portion from 16th St. to 21st St. is included as part of the Regional Freight Network in the Regional Freight Plan for the Indianapolis Metropolitan Planning Area

⁷ <https://www.indympo.org/whats-completed/regional-plans/freight-plans>

Total Traffic

Table C.4 shows the forecasted total vehicles that would be diverted during the peak hours in 2041 due to the change in access with the refined Alternative 4c. Approximately 1,074 vehicles are anticipated to be diverted during the AM peak hour and 423 vehicles are anticipated to be diverted during the PM peak hour. This is a small amount of traffic considering approximately 16,800 vehicles are forecasted to be exiting the interstates in the downtown area (21st Street, West Street, Illinois/Meridian Streets, North Street, Michigan Street, Vermont Street, New York Street, Ohio Street, Fletcher Avenue, East Street, Madison Avenue, and Missouri Street) during the AM peak hour in 2041, and 12,300 vehicles are forecasted to be entering the interstates at the same interchanges during the PM peak hour in 2041. The total vehicles that would be diverted are approximately 6% of the total entering downtown in the AM peak hour and 3% of the total leaving downtown in the PM peak hour.

Table C.4. 2041 AM and PM Peak Hour Total Vehicles Diverted		
Traffic Movement	Total Vehicles (AM)	Total Vehicles (PM)
I-70 WB to Pennsylvania St.	900	252
Delaware St. to SB C-D	67	138
Delaware St. to SB I-65	107	33
TOTAL	1,074	423

Tables C.5 and C.6 and Figures C.4 and C.5 show the more notable maximum traffic increases for local streets outside of the APE during the AM and PM peak hours, respectively. The estimated 2041 no-build and 2041 Alternative 4c volumes are provided so conditions can be compared with and without the two ramp changes in refined Alternative 4c.

Only the maximum increase along a portion of a street is shown in Tables C.5 and C.6. Total changes will vary along the street. Since traffic growth can be experienced differently based on the number of lanes available, a second value is provided in the tables. This value, referred to as “volume rate change,” is a measure of density, expressed as added vehicles per minute per lane. The number of lanes can also vary along a street and those in the table are for the segment with the maximum increase. This measure is intended to capture the perception of added traffic on adjacent properties. One vehicle added to a lane over the course of a minute is unlikely to be perceptible.

Under Section 106, an effect is something that would constitute an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register. From a Section 106 perspective, substantial traffic increases in residential areas would likely be of greater concern than those in more commercial or industrial areas where the presence of traffic would be expected. Lower traffic levels could be an aspect of integrity for historic residential neighborhoods. For those streets with notable traffic increases in Tables C.5 and C.6, streets that are within single-family/duplex residential areas⁸ are highlighted in gray and are discussed in greater detail in the text below.

⁸ Based on Marion County GIS parcel data.

Table C.5. 2041 AM Peak Total Vehicle Increases

Roadway Segment	From	To	No-Build Volume	Alt 4c Volume	Max. Volume Change	Lanes	Volume Rate Change (Veh/Min/Lane)	Functional Classification
21st St.	Dr. MLK Jr. St.	Meridian St.	383	513	130	4	0.54	Minor Arterial
21st St.	Bosart Ave.	Emerson Ave.	640	711	71	4	0.30	Minor Arterial
16th St.	Dr. MLK Jr. St.	Alabama St.	2,135	2,219	84	4	0.35	Minor Arterial
10th St.	White River Pkwy.	11 th Street split	2,310	2,536	226	4	0.94	Minor Arterial
11 th Street	10 th St. split	West St.	2,273	2,390	117	3	0.65	Minor Arterial
Indiana Ave.	10th St.	West St.	1,466	1,563	97	4	0.40	Minor Arterial
St. Clair St.	Indiana Ave.	Delaware St.	1,144	1,190	46	2	0.38	Minor Arterial
North St.	Senate Ave.	Massachusetts Ave.	340	390	50	2	0.42	Minor Arterial
Michigan St.	Capitol Ave.	East. St.	943	1,278	335	2	2.79	Minor Arterial/ Major Collector
Michigan St.	Highland Ave.	Gray St.	1,048	1,144	96	2	0.80	Minor Arterial/ Minor Collector
Vermont St.	Illinois St.	Massachusetts Ave.	299	529	230	2	1.92	Minor Arterial
New York St.	Limestone St.	New Jersey St.	1,049	1,161	112	3	0.62	Minor Arterial
New York St.	Keystone Ave.	Highland Ave.	398	426	28	2	0.23	Minor Arterial
Ohio St.	West St.	New Jersey St.	592	726	134	4	0.56	Minor Arterial
Market St.	Capitol Ave.	New Jersey St.	108	128	20	2	0.17	Minor Collector
Porto Alegre St.	10th St.	Harvey Middleton Way	681	751	70	2	0.58	Local Street
University Blvd.	10th St.	Indiana Ave.	1,220	1,286	66	4	0.28	Major Collector
Limestone St.	New York St.	Michigan St.	420	487	67	2	0.56	Major Collector
Dr. MLK Jr. St.	21st St.	25th St.	1,920	1,985	65	2	0.54	Major Arterial
Missouri St.	I-70	West St. split	4,137	4,440	303	4	1.26	Major Arterial
West St.	Raymond St.	I-70	1,644	1,713	69	4	0.29	Minor Arterial
West St.	Missouri St. split	New York St.	2,934	3,095	161	6	0.45	Major Arterial
Senate Ave.	12th St.	16th St.	577	714	137	2	1.14	Minor Arterial
Capitol Ave.	Maryland St.	Ohio St.	1,002	1,065	63	4	0.26	Minor Arterial
Pennsylvania St.	Georgia St.	St. Clair St.	1,342	1,480	138	3	0.77	Major Arterial
Massachusetts Ave.	Vermont St.	Michigan St.	780	998	218	2	1.82	Minor Arterial

Note: Gray highlighting indicates a portion of the street is within a single-family/duplex residential area based on Marion County GIS parcel data.

Table C.6. 2041 PM Peak Total Vehicle Increases

Roadway Segment	From	To	No-Build Volume	Alt 4c Volume	Max. Volume Change	Lanes	Volume Rate Change (Veh/Min/Lane)	Functional Classification
25th St.	College Ave.	Keystone Ave.	882	960	78	2	0.65	Major Collector
Michigan St.	Eskenazi Ave.	East St.	1,914	1,982	68	4	0.28	Minor Arterial/ Major Collector
21st St.	Dr. MLK Jr. St.	Meridian St.	1,112	1,195	83	4	0.35	Minor Arterial
16th St.	Aqueduct St.	Meridian St.	1,723	1,800	77	4	0.32	Minor Arterial
38th St.	Illinois St.	Fall Creek Pkwy	1,729	1,803	74	6	0.21	Major Arterial
Washington St.	Emerson Ave.	Oriental St.	1,439	1,505	66	4	0.28	Major Arterial
30th St.	Illinois St.	Sherman Dr.	1,823	1,901	78	3	0.43	Minor Arterial
West St.	Maryland St.	10 th St.	3,301	3,431	130	6	0.36	Major Arterial
West St.	I-70	Raymond St.	2,379	2,432	53	4	0.22	Minor Arterial
Meridian St.	38 th St.	16 th St.	1,067	1,106	39	2	0.33	Major Arterial
Meridian St.	St. Clair St.	I-70	520	625	105	4	0.44	Minor Arterial
Dr. MLK Jr. St.	25 th St.	10th St.	1,566	1,631	65	4	0.27	Major Arterial
Delaware St.	Market St.	Arch St.	1,176	1,294	118	3	0.66	Major Arterial
Delaware St.	15 th St.	22 nd St.	803	836	33	3	0.18	Minor Arterial
Illinois St.	38th St.	15 th St.	1,583	1,729	146	3	0.81	Minor Arterial
Illinois St.	St. Clair St.	Ohio St.	1,425	1,503	78	4	0.33	Minor Arterial
Emerson Ave.	Washington St.	10 th St.	1,043	1,270	227	2	1.89	Major Arterial
Emerson Ave.	10 th St.	I-70	1,403	1,555	152	4	0.63	Major Arterial
Sherman Dr.	38 th St.	Washington St.	961	1,065	104	2	0.87	Minor Arterial
Keystone Ave.	I-70	30th St.	3,238	3,386	148	4	0.62	Major Arterial
East St.	Washington St.	Raymond St.	280	360	80	2	0.67	Minor Arterial
Senate Ave.	10th St.	16th St.	308	364	56	2	0.47	Minor Arterial
Massachusetts Ave.	New York St.	East St.	806	864	58	2	0.48	Minor Arterial

Note: Gray highlighting indicates a portion of the street is within a single-family/duplex residential area based on Marion County GIS parcel data.

Total Vehicles Increase

Traffic increases ranged from 20 vehicles (Market Street) to 335 vehicles (Michigan Street), both during the AM peak. The top affected roadway segments based on increased traffic volume are listed below.

- Michigan Street, Capitol Avenue to East Street – 335 vehicles (AM peak)
- Missouri Street, I-70 to West Street split – 303 vehicles (AM peak)
- Vermont Street, Illinois Street to Massachusetts Avenue – 230 vehicles (AM peak)
- Emerson Avenue, Washington Street to 10th Street – 227 vehicles (PM peak)
- 10th Street, White River Parkway to 11th Street split – 226 vehicles (AM peak)
- Massachusetts Avenue, Vermont Street to Michigan Street – 218 vehicles (AM peak)
- West Street, Missouri Street split to New York Street – 161 vehicles (AM peak)
- Keystone Avenue, I-70 to 30th Street – 148 vehicles (PM peak)
- Illinois Street, 38th Street to 15th Street – 146 vehicles (PM peak)
- Pennsylvania Street, Georgia Street to St. Clair Street – 138 vehicles (AM peak)

Traffic Density Increases

Density increases ranged from 0.17 vehicles/minute/lane on Market Street to 2.79 vehicles/minute/lane on Michigan Street. Local streets that showed density increases more than one vehicle/minute/lane are listed below.

- Michigan Street, Capitol Avenue to East Street – 2.79 vehicles/minute/lane (AM peak)
- Vermont Street, Illinois Street to Massachusetts Avenue – 1.92 vehicles/minute/lane (AM peak)
- Emerson Avenue, Washington Street to 10th Street – 1.89 vehicles/minute/lane (PM peak)
- Massachusetts Avenue, Vermont Street to Michigan Street – 1.82 vehicles/minute/lane (AM peak)
- Missouri Street, I-70 to West Street split – 1.26 vehicles/minute/lane (AM peak)
- Senate Avenue, 12th Street to 16th Street – 1.14 vehicles/minute/lane (AM peak)

As shown above, roadways with the largest increase in vehicles would be Michigan Street and Missouri Street, which are served directly by ramps from downtown interstates. All roadways listed above, except for a portion of Michigan Street are arterials, which are designated within the Indianapolis Thoroughfare Plan for carrying high volumes of traffic (Figure C.3). Except for Emerson Avenue, a portion of Michigan Street, and Vermont Street and Massachusetts Avenue in the downtown core, all are multi-lane facilities.

Perception of density increases of less than one vehicle/minute/lane are anticipated to be minimal. It is questionable whether fewer than three vehicles per minute per lane would be perceptible on an arterial/major collector like Michigan Street in the core of downtown during the peak hours. It is unlikely that the lower increases in density on other routes listed above would be visually and audibly perceptible during peak hours. Of all the streets within single-family residential areas,

Emerson Avenue is the only street with an increase of over one vehicle/minute/lane in the peak hour.

Most of the top affected roadway segments are within commercial, office, educational, medical, entertainment, institutional, multifamily residential (urban apartment or condominium), and industrial areas; however, portions of Emerson Avenue, Illinois Street, and Keystone Avenue are within single-family residential areas. Because the likelihood for a possible Section 106 effect is higher in residential areas, these streets are discussed in more detail below.

Keystone Avenue is a four-lane major arterial with over 3,000 vehicles forecasted in the 2041 no build condition PM peak hour. A 148-vehicle (5%) increase would result in less than one vehicle/minute/lane increase during the peak hour. This traffic increase is not anticipated to change the setting of adjacent areas.

Illinois Street is a three-lane minor arterial with over 1,500 vehicles forecasted in the 2041 no build condition PM peak hour. A 146-vehicle increase (9%) would result in less than one vehicle/minute/lane increase during the peak hour. This traffic increase is not anticipated to change the setting of adjacent areas.

Emerson Avenue has over 1,000 vehicles forecasted in the 2041 no build condition peak hour. The portion from Washington Street to 10th Street shows an increase of 227 vehicles (22%) in the PM peak hour. Emerson Avenue is a major arterial that connects Washington Street (also an arterial) to I-70. It has two lanes from Washington Street to 10th Street, and four lanes from 10th Street to I-70. The area is primarily residential. The forecasted density increase during the PM peak hour is 1.89 vehicle/minute/lane, and it would likely be less during off-peak hours throughout the day.

Emerson Avenue was the only street within a residential area that had an increase in density of over one vehicle/minute/lane in the peak hour. For this reason, the volume to capacity ratio (v/c) was calculated for this street segment. Volume to capacity ratios measure whether a street may be reaching its capacity. A v/c ratio less than 0.85 generally indicates that adequate capacity is available and vehicles are not expected to experience significant queues and delays. The v/c ratio for northbound Emerson Avenue with refined Alternative 4c during the PM peak hour would be 0.70 compared to 0.63 with the no build. The v/c ratio for southbound Emerson Avenue with refined Alternative 4c during the PM peak hour would be 0.59 compared to 0.58 with the no build. Although this increase in traffic may be perceptible, the forecasted traffic would still be under capacity for Emerson Avenue. These traffic changes are unlikely to constitute an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.

Conclusions

Increases in heavy truck traffic would be minimal, fewer than five trucks per hour, on all streets outside the current APE. Most of the streets where these are forecasted are designated as part of the Regional Freight Network in the Regional Freight Plan for the Indianapolis Metropolitan Planning Area and would see only one to two additional heavy trucks due to traffic diversion during the peak hour. The small number of diverted heavy trucks is reasonable considering the

relatively small number of heavy trucks that use the two ramps affected by the refined Alternative 4c. They would only use these ramps for local deliveries and there are many other options for entering or leaving the interstate system downtown. The small number of trucks diverted is not anticipated to affect contributing features or alter the setting to degree that result in effects to historic properties. This would not warrant a change in the boundaries of the APE.

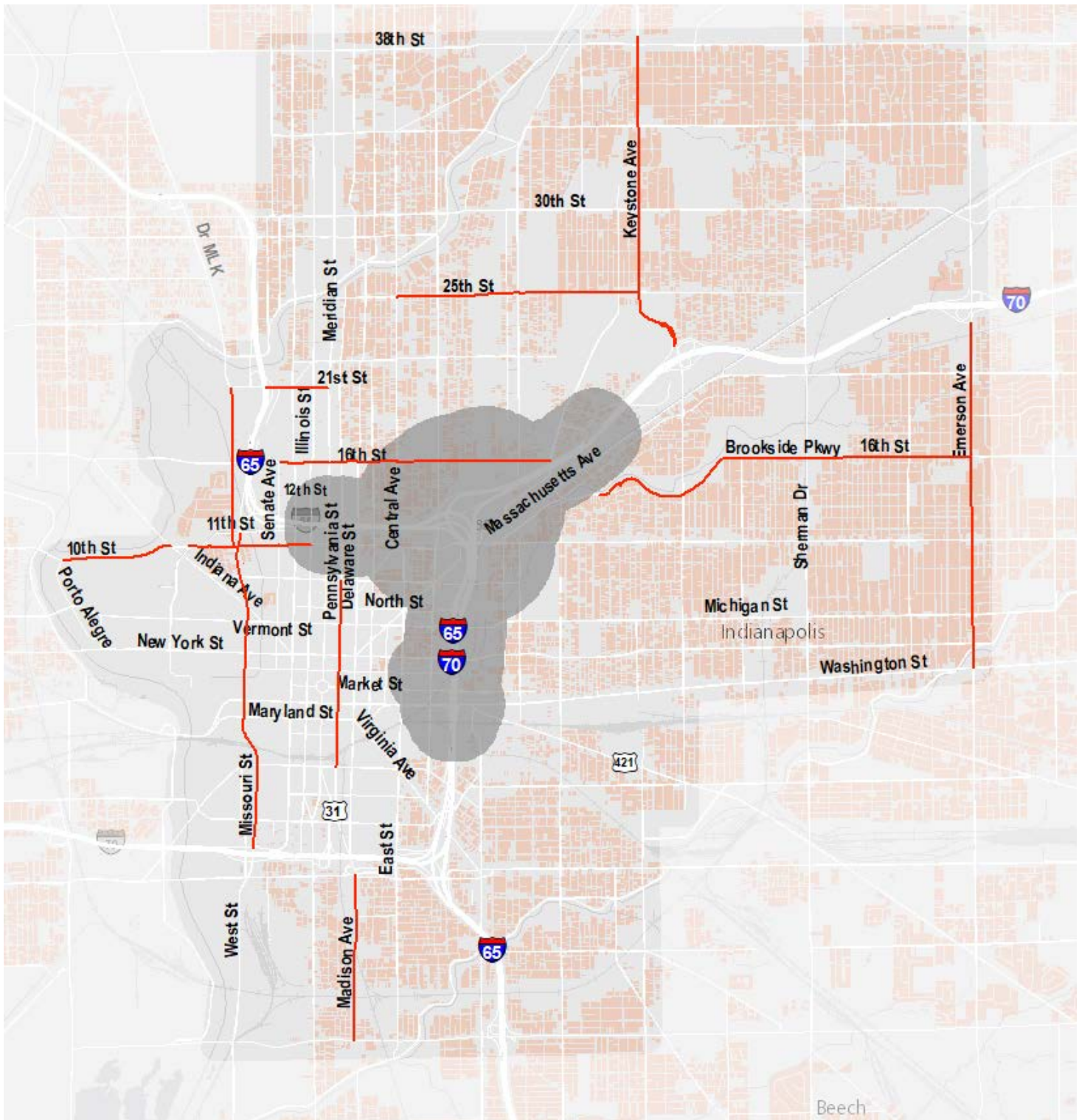
At most locations, diversions in total traffic would occur on arterial streets, which are designated in the Indianapolis Thoroughfare Plan for carrying large volumes of traffic. The routes most affected are either in the downtown core or are linked directly with interstate ramps. The most notable increase in traffic, measured as added vehicles would be on Michigan Street. This would be the primary inbound diversion route for vehicles from I-70 that would be unable to exit at Pennsylvania Street.

Changes in traffic density may be the best indicator of how traffic increases would be perceived at adjacent properties. Most roadway segments would see fewer than one additional vehicle per minute per lane in the peak hour. The most notable increase, 2.79 vehicles/minute/lane, would be on Michigan Street, which is already one of the primary one-way arterials available for entry into downtown from the east. In addition, this would only be in the AM peak hour and would be less throughout the remainder of the day.

The top traffic increases by volume and by density within single-family residential areas primarily occur on arterials, which are designed to carry higher volumes of traffic. Emerson Avenue is the only street in a residential area with a density of over one vehicle/minute/lane; however, v/c ratios showed it would remain under capacity during the 2041 peak hour with refined Alternative 4c. Taken together, these traffic changes are not anticipated to result in an effect under Section 106 and do not support an expansion of the APE beyond the boundaries already established.

Year: 2041

Figure C.1. Heavy Truck Traffic Increase
(Local Roadways)



— Heavy Truck Traffic

Area of Potential Effect Single Family/Duplex Residential Parcels

Figure C.2. Indianapolis MPO Regional Freight Plan Map

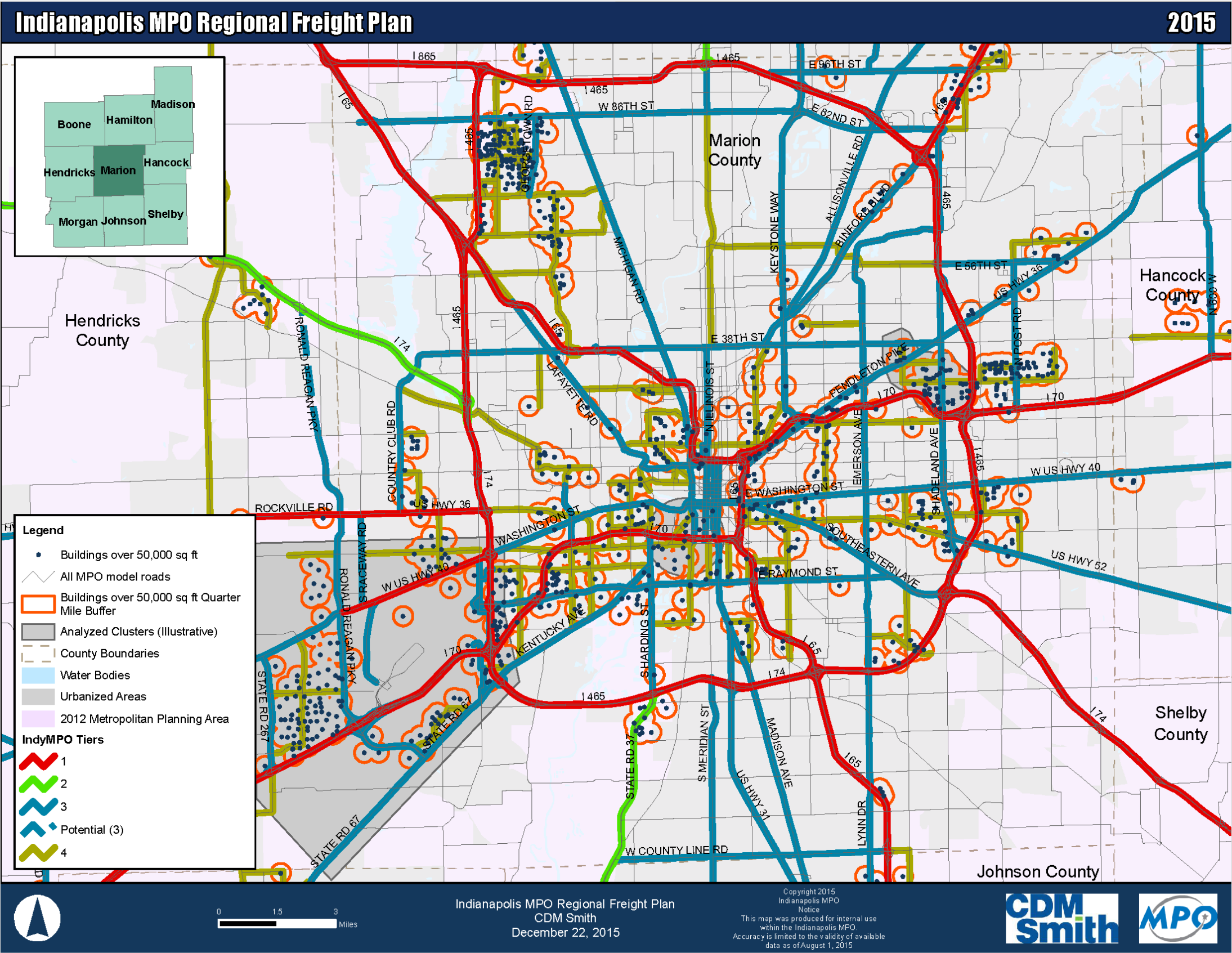
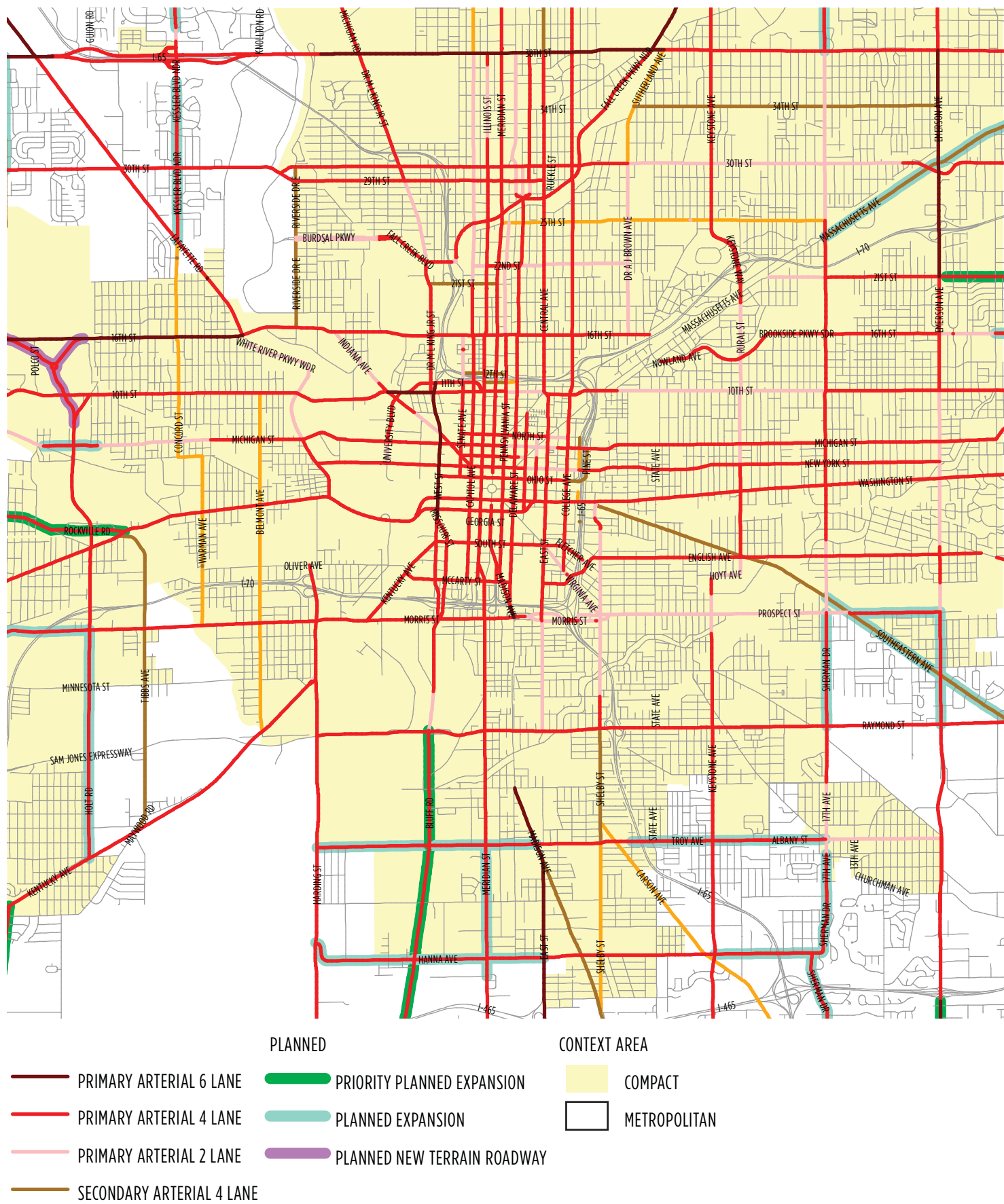
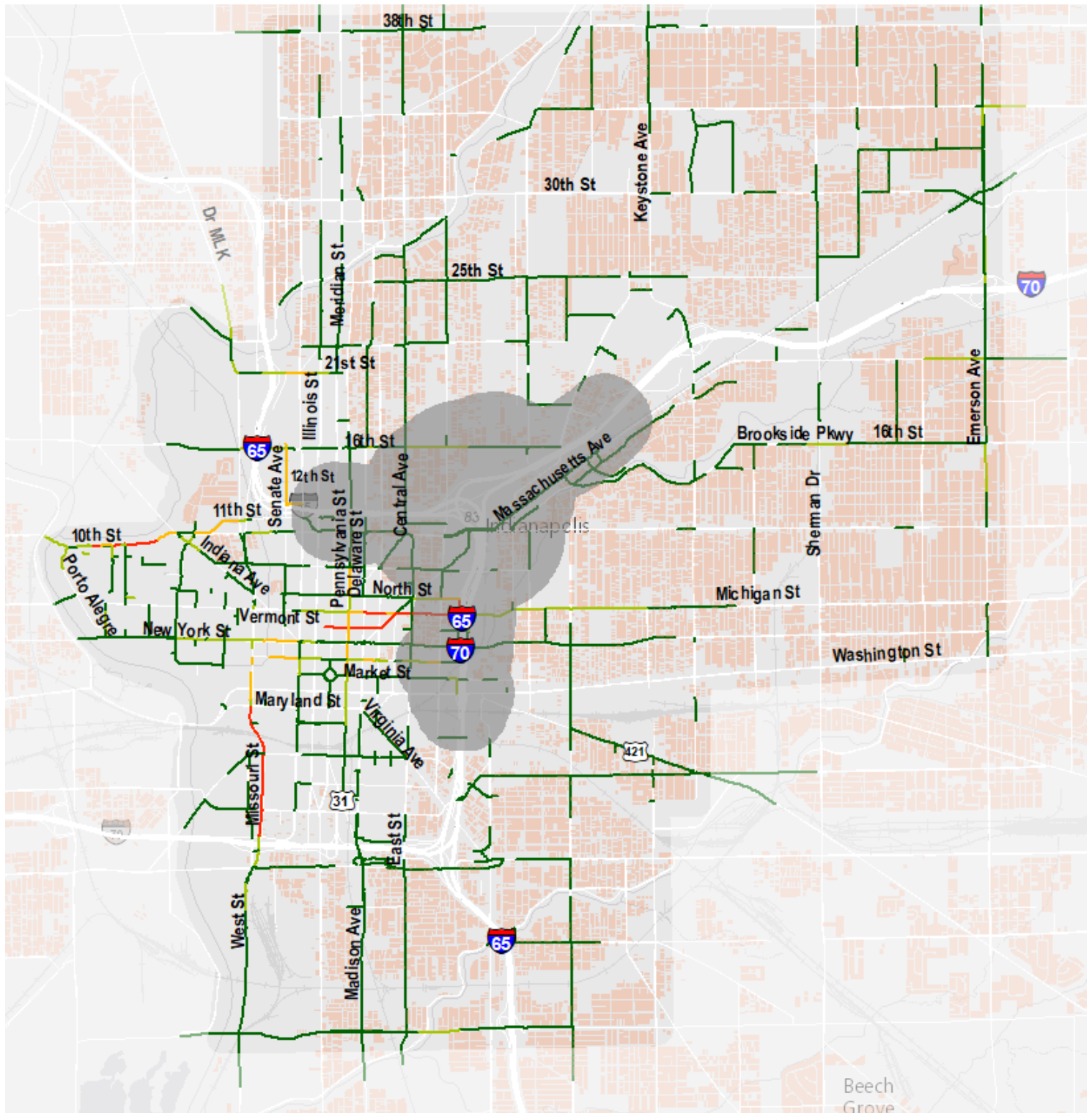


Figure C.3. Indianapolis Thoroughfare Plan Arterial Network
ARTERIAL NETWORK (CORE AREA ZOOM)



Year: 2041
Time: AM

Figure C.4. Total Vehicle Increase
(Local Roadways)

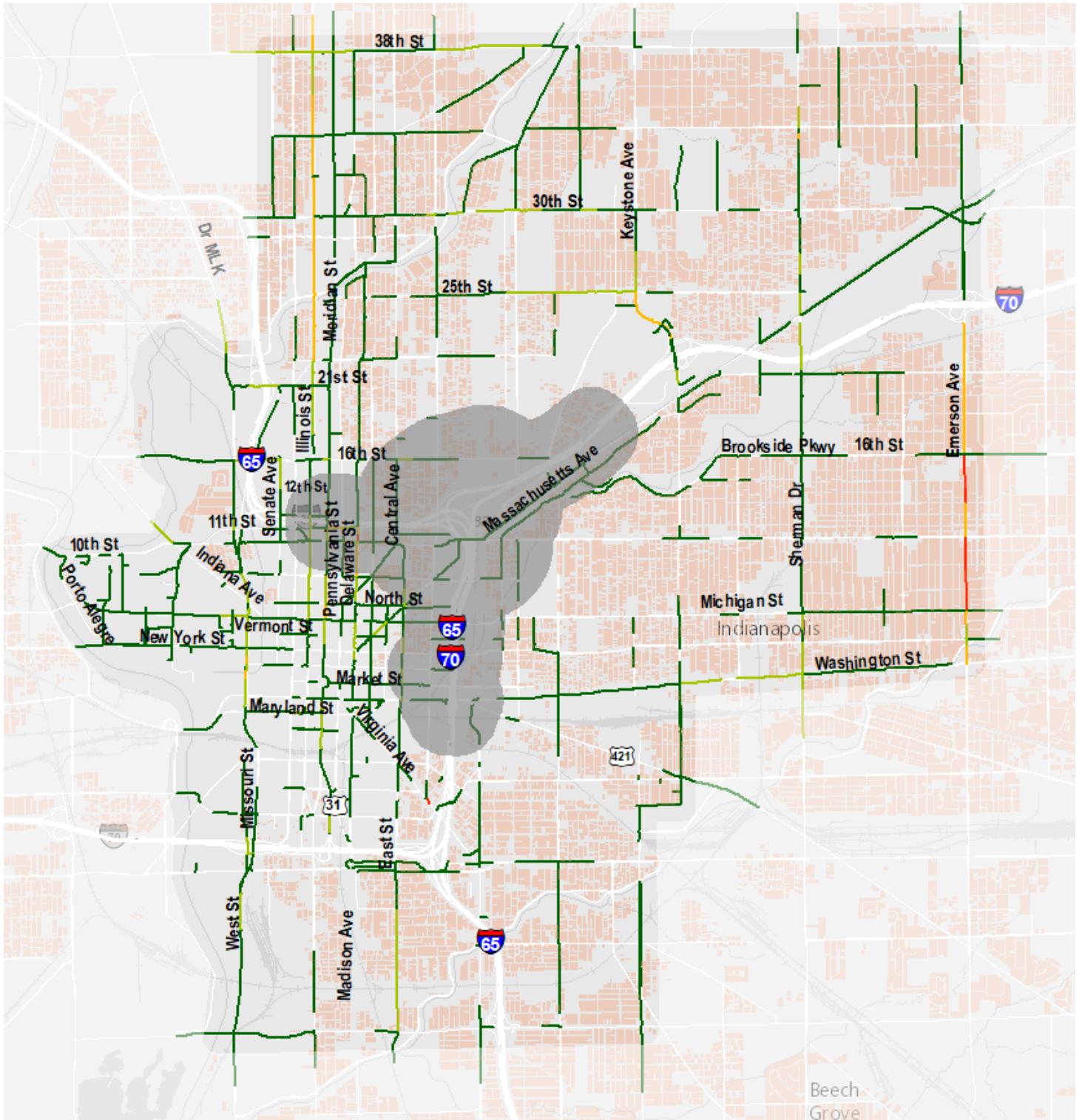


1 - 50 51 - 100 101 - 150 151 - 450

Area of Potential Effect Single Family/Duplex Residential Parcels

Year: 2041
Time: PM

Figure C.5. Total Vehicle Increase
(Local Roadways)



1 - 50 51 - 100 101 - 150 151 - 450

Area of Potential Effect Single Family/Duplex Residential Parcels

Section 106 Update Memo #3

Attachment D

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 September 28, 2018 to November 3, 2018

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

Comment	Response
Lockerbie Square Neighborhood – Marjorie Kienle – 10/11/2018	
<p>I really thought that I totally got when we were in the meeting but now I have a bunch of questions.</p> <p>1. With the changes to make the transition easier on I-70 coming from the west (like the airport), going through toward the east, it sounds like you are changing 65 and 70 so that 70 will be on the right and 65 will be on the left? Is that correct? If so, if you are coming from 65 south, do you have to cross over lanes to get to the Washington Street exit or will you not be able to exit there and have to go on to Pennsylvania or exit early at Morris? (I thought that you said that 65 would exit at Pennsylvania but not 70).</p> <p>2. I needed a little more clarification about the Delaware Street ramp. I understand that it still curves to the right to Michigan Street, etc. However, is that the only thing you can do? Is it correct that you cannot get on either I-65 or I-70 at that point? If you want to get on those interstates, you have to get on at West Street????? Sorry... it seemed perfectly clear in your meeting and then I got home and tried to explain it to Jim and realized that I was not sure.</p>	<p>No problem, the changes are a bit confusing. Please see responses below.</p> <p>1. The only change for northbound traffic on the east leg will be at the “entry” to the north split. Currently, traffic going east on I-70 enters the north split on the right and traffic going north on I-65 enters on the left. Since I-70 and I-65 traffic leaves the south split on the opposite side, through traffic has to cross paths. The north split project will switch the entry points so that I-70 enters the north split on the left and I-65 enters on the right. Traffic will no longer have to go from right to left or left to right on this section. No exit ramps are closed on this section and I-65 traffic would exit at Washington just as it does today. It is true that I-65 will be able to exit at Pennsylvania and I-70 will not. [Note: Only westbound I-70 would be affected. Eastbound I-70 could still access the ramp via northbound I-65.]</p> <p>2. You are correct that the Delaware entrance ramp will still curve to the right to serve Michigan and Ohio Streets. From the Delaware ramp, you will have direct access to I-70. The Delaware Street ramp will not connect to I-65 as it does now, but you will still be able to access I-65. The ramp (we call it a C-D road) that serves Michigan and Ohio Streets continues past those exits and merges into I-65 further south. Think of it as a longer ramp—it still takes you to I-65. [Note: Subsequent to the Alternatives Screening Report and this email response, the preliminary preferred alternative was refined so I-65 southbound connects to the C-D road and the entrance ramp at Delaware Street does not. The Delaware Street ramp will only connect to I-70 eastbound.]</p>

<p>3. I think that I got it about 70 going west from the eastside...you will not be able to exit at Pennsylvania but can exit at Michigan/Ohio/Fletcher or go further and exit on West Street AND going east on 65 from the Westside, you will not be able to exit at Michigan/Ohio/Fletcher but you will be able to exit earlier on West Street, or Meridian or go on around and exit at Fletcher</p> <p>4. When you talk about the 4 principles in your slides, you mention the Chamber and the City but neglect to include Rethink Coalition which is where the 4 principles originated. Is there a reason for that?</p> <p>I appreciate the work to make these weaving transitions safer. When coming from the west on I70, I simply get off at Illinois because coming through downtown with all of its traffic feels safer to me than trying to weave across lanes to get to Washington Street and when I enter at Delaware to go east on I70, I just pray.</p>	<p>3. Everything you say is correct, with one exception. You can't get to the Fletcher exit unless you are on the C-D road that serves Michigan and Ohio Street, and I-65 will not have access to the C-D road. <i>[Note: Subsequent to the Alternatives Screening Report and this email response, the preliminary preferred alternative was refined so I-65 southbound connects to the C-D road as noted above.]</i></p> <p>4. It was not deliberate. I think the letter we saw with that information was from the Chamber. We can add the Rethink Coalition to that slide on future presentations.</p>
<p>Lockerbie Square Neighborhood – Marjorie Kienle – 10/29/2018</p>	
<p><i>I want to personally thank INDOT for trying to listen to the citizens of Indiana and Indianapolis in the quest for an improved I65- I70 throughout downtown that will achieve their safety and transportation goals while respecting the four principles so very important to those who live and/or work downtown:</i></p> <ol style="list-style-type: none"> <i>1) No above grade walls</i> <i>2) No expansion of the existing number of through lanes</i> <i>3) Increased connectivity of neighborhoods and areas of commerce divided by the interstates</i> <i>4) Increased opportunities for inclusive economic development along the path of the interstates</i> <p><i>There will still be walls with 4c but not so high and with green space that can be designed as parklike. There will be no through lanes but there will be an expansion of the roadbed, encroaching upon historic properties that are still worrisome. But the continued opportunities lie in working toward principles 3 and 4. I think that we can do better.</i></p> <p><i>Further, the lack of participation by INDOT in the meetings with Arup is very distressful. This study was funded by private money, much of which was a small donation from many people. The lack of participation is extraordinarily disrespectful and surprising. We have made good progress trying to find something that will be win-win. We are not there yet.</i></p>	<p><i>The four principles proposed by the Coalition and others were considered, as noted in Chapter 3 of the Alternatives Screening Report (https://northsplit.com/project-documents/).</i></p> <p><i>Opportunities related to principles 3 and 4 will be explored as part of the Context Sensitive Solutions (CSS) process as project development continues. Note: The statement, "...there will be an expansion of the roadbed, encroaching upon historic properties" is incorrect. There will be no direct impact upon historic properties for Alternative 4c.</i></p> <p><i>INDOT reviewed the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018. The independent study estimated the potential economic benefits of a new concept plan for the full downtown interstate system. Since its focus was areas outside the North Split interchange project area, its findings were not considered in evaluating the alternatives in the North Split Alternatives Screening Report.</i></p>

Indianapolis Department of Metropolitan Development – Meredith Klekotka – 10/17/2018	
Brad will be replacing me on the group.	Brad Beaubien, representing the Indianapolis Department of Metropolitan Development, has been added to the North Consulting Parties list.
Indianapolis MPO - Jennifer Higginbotham – 10/17/2018	
<p>Hey Kia. Is this an old report or a recent one? People on next door are talking about the project. I told them I think this is old, and that there is a newer report out, but I wanted to confirm that.</p> <p>https://indynorthsplit.com/wp-content/uploads/2018/01/I-65.I-70-Project-Intent-Report-Summary.pdf</p>	<p>You are correct. That is the old Project Intent Report. Alternative 5 in the Alternatives Screening Report was similar to the one described in that report and it has been eliminated from further consideration.</p> <p>The Alternatives Screening Report is the most current document on the project and it is located here: https://northsplit.com/project-documents/alternatives-screening-report/</p> <p>Information specifically on the preliminary preferred alternative 4c is located here: https://northsplit.com/project-documents/screening-report/alternative-4c/</p> <p>We are also happy to meet with neighborhoods if that would be helpful.</p>
Indianapolis Historic Preservation Commission – Meg Purnsley – 10/01/2018	
<p>The Alternate 4C map that is on the website does not include the correct historic district boundaries for IHPC.</p> <p>Also, I cannot zoom into the map enough to see where some of the work is occurring. Also, the 4C map stops at Pennsylvania Street. Is the work west of this on another map, or part of another phase? I ask because it seems to be included in the Section 106 consulting parties documentation.</p>	<p>The historic districts on the maps are the National Register boundaries. We can put together a version with the IHPC boundaries if that would be helpful; however, can you resend the shapefiles? For some reason they are not working. There are some maps that are zoomed in closer on the website too: https://northsplit.com/maps/alternative-4c-maps/ But please keep in mind these are preliminary and the blue lines indicating walls are not to scale. There will be no work outside of the existing right-of-way. The cross sections at the bottom of the page may help too: https://northsplit.com/project-documents/screening-report/alternative-4c/ We still have not designed the project, but we think there could be traffic signal work along 11th and 12th at Meridian which is why it is included in the Section 106 information. At this point we anticipate the bulk of the work on those streets to stop at Pennsylvania.</p> <p>We would be happy to meet with you and anyone on the IHPC to go over the preliminary preferred alternative and Alternatives Screening Report in the next couple of weeks if you would like.</p>
I think a meeting would be helpful, and including the State Historic Preservation Office in on this I think would also be helpful. Since the	I'm going to need a shapefile or CADD file in order to include on the maps. The map I reviewed at the link below seemed pretty

<p>shapefiles aren't working, try these maps on http://maps.indy.gov/MyNeighborhood/ or http://www.indy.gov/eGov/City/DMD/IHPC/Districts/Pages/home.aspx</p> <p>The IHPC boundaries are going to be essential to include on your maps. The impact must be clearly shown on these locally protected historic areas, and I would consider this to be essential to the 106 review as well. I am copying Chad Slider on this so he can see my comments as well.</p> <p>So, for clarification, this alternative does not include the demolition of the building at 12th and Alabama as previously shown? And, no ramps or other work are within the City's ROW?</p>	<p>general and I'm afraid we may not interpret the boundaries correctly. Some of the boundaries appeared to go into the interstate.</p> <p><i>[Note: IHPC historic district boundaries were added to maps presented at a meeting with the IHPC Administrator and SHPO staff on October 15, 2018.]</i></p> <p>This alternative does not include any building demolition. Work will be done along 11th and 12th Streets. I don't know at this time if that is considered INDOT or City right-of-way. Regarding work beyond Pennsylvania, we think there could be traffic signal work along 11th and 12th at Meridian which is why it is included in the Section 106 information. At this point we anticipate the bulk of the work on those streets to stop at Pennsylvania. The work on the interstate will likely stop even further to the east. This project does not include the West Street interchange.</p>
<p>Indianapolis Historic Preservation Commission - Meg Purnsley - 10/29/2018</p>	
<p><i>Thanks to you and your team for working with the CAC and Consulting Parties. Regarding the North Split Alternatives Screening Report, I respectfully provide the following comments.</i></p> <p><i>The number of historic resources, both locally and nationally designated, that are impacted by this project are extraordinary. In 1963, local preservationists were aware of the threat the interstate was going to have on historic preservation, and this project became the impetus for Indiana Landmarks purchasing the Morris Butler House as formed a Lockerbie Square Committee to support State legislation creating the IHPC Indianapolis Historic Preservation Commission. Here we are five decades later, having a similar conversation on how the interstate impacts historic resources. Although I commend you and your team for working hard towards trying to mitigate the impact this project might have on historic structures and neighborhoods, but it would be contrary to our mission to provide any indication of support for the alternative as proposed. The widening of the physical interstate will set it significantly closer, 20 feet in some areas, to significant historic neighborhoods such as the Old Northside which includes the Indiana Landmarks Center, St. Joseph, Chatham Arch- Massachusetts Avenue, Fletcher Place, Cottage Home and Lockerbie Square among others.</i></p> <p><i>It strikes me that more time is needed to determine answers to several unanswered questions about the project, including, but not limited to, possible other alternative design options. Indianapolis has lived with the positive and negative impacts of the introduction of the interstate for 50 years, so allowing a reasonable amount of additional time to sort through the design questions and mitigation efforts would be the responsible thing to do. Thanks for your time.</i></p>	<p><i>As noted in the comment, the existing roadway footprint is widened and retaining walls are proposed on the west leg in Alternative 4c, as described in the Alternatives Screening Report. It is acknowledged that Alternative 4c is not within the existing pavement footprint and does not eliminate retaining walls. A different alternative, Alternative 4a, would accomplish these objectives, albeit with the trade-off of lost access to the immediate area via Delaware Street and Pennsylvania Street ramps. The trade-offs and the rationale for selecting Alternative 4c as the preliminary preferred alternative are described in the Alternatives Screening Report.</i></p> <p><i>Interstate widening is not anticipated near Fletcher Place, Cottage Home, or Lockerbie Square historic districts. Efforts to minimize impacts on the historic districts will continue as the project is developed. If it is determined that adverse effects will occur to historic properties, mitigation measures will be developed as part of the Section 106 process in consultation with consulting parties.</i></p>

Property Owner – Andrew House – 10/20/2018	
Please remove me from the consulting parties list.	Mr. House was removed from the North Split Consulting Parties list.
Keep Indianapolis Beautiful – Joseph Jarzen – 10/25/2018	
At the consulting parties meeting, it was shared comments were due back by end of day October 29. One of the questions was about extending that deadline to accommodate neighborhood’s abilities to meet and compile their comments. I wondered if there was any consideration for this?	Comments are still due by October 29; however, if you can get them in by October 31 we will still accept them. Thanks for checking.
We are working on putting together our feedback, and I wondered what flexibility there might be to provide feedback by end of day Oct. 31? We have one more VP-Director meeting on Tuesday, and that would allow me time to have something to share with them before submitting to you.	
Keep Indianapolis Beautiful – Joseph Jarzen – 10/30/2018	
<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 a preferred alternative to the I-65/I-70 North Split Interchange Reconstruction Project in the City of Indianapolis, Marion County (Des. Number (Nos.) 1592385 & 1600808). KIB hopes that any project at this site will balance improving current infrastructure conditions, provide a sustainable solution to traffic needs through and around Indianapolis beyond the next 50 years, and improve or at least not further harm quality of life for the City and the neighborhoods adjacent to the interstate, which include but are not limited to economic investment opportunities and improved environmental impacts. KIB believes that this project can minimize adverse effects by considering how the project will impact the character of the neighborhood's setting, whether that be visual, atmospheric and audible elements.</i>	<i>A Context Sensitive Solutions (CSS) process is being carried out as part of the North Split National Environmental Policy Act (NEPA) process to identify ways the project can be positively integrated into the community, to maintain and enhance the natural environment through retention or addition of landscape features, and to define elements of the overall design that improve connectivity and quality of life in the community. Pedestrian and bicycle connectivity, aesthetics, and landscaping as they relate to the North Split project will be discussed as part of this CSS process. KIB is one of the agencies asked to participate in the CSS process.</i>
<i>One way to address the visual, atmospheric and audible elements of a neighborhood's character is to preserve existing trees and plant additional native plants and trees throughout the project area. A mature tree canopy is prevalent throughout the adjacent neighborhoods. Maintaining and growing the tree canopy along the interstate impacts the aesthetic look of the neighborhoods, which will continue that historic character and soften the division line between the neighborhood and where it meets the interstate. An intentionally planted and expanded natural barrier will also significantly impact the annual benefits of carbon sequestration and other greenhouse gas mitigation, increase stormwater interception and reduce noise impacts. National studies prove the positive impacts of trees. The Green Heart Project by the University of Louisville (https://louisville.edu/jgreenF) proves the impact of large trees upon a school along a highly traveled street. Results show mature trees provide significant benefits on air quality and health of students at the school. It is critical to ensure there is an increase in net green to accommodate high traffic counts that will exist by maintaining an interstate through downtown. These comments are submitted responding to the preferred Alternative 4C shared during October 2018.</i>	<i>Comments regarding the value of trees along the interstates and specifically, the value of retaining existing mature trees where possible, and adding additional trees are noted. The retention and addition of trees and other vegetation, as well as the incorporation of murals or other public art, will be addressed in the CSS process described above.</i>

Immediately adjacent to the project site are approximately 1,225 1-2" caliper trees that were planted as far back as 2007. Many of these trees are reaching maturity and having clear environmental and aesthetic impacts. Growing taller than the surface elevation of the interstate, these trees will continue to have significant impact if allowed to continue to thrive.

In addition to the trees, KIB has also invested time, money and resources into 11 murals on underpasses throughout the project site. Note that the value of all these investments totals \$1,055,113 (including cost for planting and maintaining trees, and preparation and creation of 11 murals).

KIB understands that Preferred Alternative 4C has a large project site that will impact many of these resources. As a result, we would request the following be included in construction and budgetary plans for this project.

- 1. Preserve and protect as many mature trees as possible. While the construction site may not be able to avoid some mature trees, particularly on the west leg of the interstate from the North Split west through Central Ave., KIB wishes that as many mature trees are protected as possible throughout the construction.
 - a. Trees along Davidson St. appear to be outside of any proposed expansion within the ROW. If possible, these trees should be preserved and clearly protected through construction within the project site and staging areas. It should be clearly noted and considered in all bidding documents.**
- 2. Replace removed mature trees with mature native trees. Any trees that are lost should be replaced to match the number of trees removed. In order to match tree size, take the square inch of the cross section/diameter at breast height (DBH) to determine what size the new tree should match. Larger size trees will require substantially more water and this is determined by taking the DBH times 10, which equals the number of gallons per week the tree should receive.*
- 3. Plant new native trees. Alternative 4C does widen the interstate within the existing ROW, however, it preserves some greenspace compared to some of the other alternatives. In light of this, there will likely be substantial plantable space. In these areas, new native trees should be planted with a preferred size of 1-2" caliper trees, including a three year maintenance plan to ensure survivability (15 gallons of water a week per tree, with appropriate pruning in subsequent years).*
- 4. Plant native plants. In the design of Alternative 4C, there appears to be substantial plantable space within the North Split itself and along the berms. The land that will be opened up along O'Bannon Park to the north will also be expanded with the condensing of the split. In all of these areas, KIB would encourage the planting of native plants that would support migratory patterns of insects, birds and butterflies, provide environmental benefits such as stormwater runoff mitigation, and create a more attractive aesthetically appealing welcome to the crossroads of America.*

<p>a. Additional art installations should be considered in the space as well, similar to that which is seen with the RNA molecule at the I-70 exit ramp onto Madison Ave. The Idle, overlooking the south split off Virginia Ave., is a good model to make an inaccessible place a bit more accessible and unique.</p> <p>5. Accommodate and install new community driven murals. It appears that all eleven Vibrant Corridor murals will be lost through Alternative 4C. In light of this, KIB believes murals should also be replaced under every underpass. Murals are one method to create a better experience that is safer, more inviting and community oriented. Designs should be driven by the community and implemented with local artists who will respond to and include suggestions from the community.</p> <p>6. Additional quality of life installations. Through this process, there have been a number of recommendations from a variety of organizations focused on ways to consider how to mend the divide between neighborhoods and their relationship with downtown. These suggestions need to be considered further. Lighting, bike lanes, pavement treatment, signage, green walls (exterior of walls planted to maximize opportunities for plants) and others not listed here should all be included in any improvements to this alternative.</p>	
<p>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. The aim is to have an interstate that can as best as it possibly can, respond to the local heritage of the city, allow for city level connections for people, and put into place mitigation techniques that will lessen the negative environmental impacts that a high traveled, high speed corridor will have upon the adjacent community. Ensuring context sensitive solutions play an integral part in the design is essential. A significant amount of KIB's financial and social capital will be negatively impacted by this project, and without the above considerations, this project can have uninvited impacts upon the community. KIB supports the exploration of opportunities that increase the tree canopy, plant more native plants, create an aesthetically inviting, artistically created environment that engages neighborhoods in the process. These are all items that need to be added into the design for Alternative 4C.</p>	<p>INDOT welcomes the participation of KIB in the CSS process for the project.</p>
<p>Benjamin Harrison Presidential Site – Charles Hyde – 10/26/2018</p>	
<p>During the presentation, I had requested a copy of the map INDOT is using to show right of way access. Do you know if that will be forthcoming?</p>	<p>Yes, the map is under development. We should have it this week. <i>[Note: A map showing preliminary existing right-of-way information]</i></p>

<p>Also, as the alternative proposals narrow in scope and acquire greater definition in their potential footprint, we want to make sure that the process takes into account (and appropriately remediates) the impact the work will have on the Benjamin Harrison Presidential Site's accessibility via the interstate, interstate exchanges, 12th street, and Delaware St. We will reserve judgment until more definite plans are enumerated, but we're mindful that a number of the proposals could negatively limit access to the national historic landmark property and museum and our grounds for the 18,000 school children we serve each year (with almost 30,000 total annual visitors). There remain additional concerns about the potential impact of the work on the viewshed and neighborhood connectivity.</p> <p>Please let me know if there's anything we need to do—or more formally submit for comment—to register those concerns at this stage in the process.</p>	<p><i>was sent to consulting parties on November 28, 2018.]</i></p> <p>We will include your comments in the project record. You do not need to do anything additional at this time. There will also be additional opportunities for comment as part of the Section 106 process moving forward.</p>
<p>IDNR Division of Historic Preservation and Archaeology – Wade Tharp – 10/26/2018</p>	
<p>In the wake of the passing of our late director (Mitch Zoll), review of Archaeological matters for the I-65/I-70 North Split Interchange Reconstruction Project has passed to me. On about 08/29/2017, Mitch had sent along a response letter regarding the "Phase Ib work plan (Coughlin, 08/25/2017) for the I-65/I-70 north split interchange modification;" however, I have found no previous or subsequent archaeology reports in our files.</p> <p>Will you please give me an idea of where in the process the archaeological investigations are?</p>	<p>The Phase Ib report was sent to INDOT CRO office on Wednesday of this week and under review.</p> <p>Jeff Laswell is completing the review. We will forward the report to your office after they completed their review. <i>[Note: The Phase Ib Archaeology Report was submitted to the State Historic Preservation Officer (SHPO) for review on December 14, 2018. The SHPO concurred with the recommendations of the report in a letter dated January 25, 2019.]</i></p>
<p>IDNR Division of Historic Preservation and Archaeology – Chad Slider – 10/29/2018</p>	
<p><i>Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC§ 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 of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed INDOT's letter, with attachments and the enclosed aforementioned alternatives screening report, received on September 28, 2018.</i></p> <p><i>Thank you for providing a copy of the alternatives screening report for review. The Indiana SHPO appreciates the effort expended in its preparation, and the detailed comments offered by consulting parties. The project to improve functioning and safety of the North Split has garnered significant interest from those most directly affected near the</i></p>	<p><i>Comment acknowledged regarding the outcome of the prior system-level study.</i></p>

project area, not to mention policymakers and the many thousands of daily users of the downtown transportation system.

The Indiana SHPO notes that a number of alternatives were identified by consulting parties and other stakeholders during the System-Level Analysis that concluded this summer. Alternatives identified included Transportation System Management (TSM) and traffic diversion, upgrading the entire inner loop interstate, depressing the interstate, at-grade boulevards or boulevards in combination with interstate tunnels, and construction of a new I-65 west leg. These creative solutions offered the potential to greatly improve the downtown interstate system to address community concerns for connectivity, sustainability, and economic vitality of the city and its neighborhoods; however, the time and cost estimates for implementation of the most sophisticated solutions to maintain an adequate level of service were high. At the conclusion of this study, it was determined that the North Split interchange would be designed to integrate with the existing interstate system, and some of the more transformative system-level alternatives would not be advanced at this time.

In the September 21, 2018 alternatives screening report, we note that alternatives 4 and 5 have been deemed the only options that meet both purpose and need, with additional variations of Alternative 4 further refined and developed. Although the preliminary preferred alternative 4C does not increase capacity to meet projected future needs nor does it completely satisfy every possible concern with the project, it appears to be responsive to the comments received from consulting parties, particularly in minimizing the impact of interstate widening and the introduction of retaining walls. We believe that the recommended combination of shorter walls, with some regrading of the embankments, and inclusion of other context sensitive design solutions is a good strategy to minimize impacts to historic properties within the area of potential effects, as provided in both alternatives 4B and 4C.

As a practical matter, we have some **concern** about potential loss of local access and concentrating interstate access at fewer, more congested entry/exit points in Alternative 4C. We would encourage INDOT to conduct a more detailed traffic analysis of city streets to ascertain local impacts and carefully consider whether traffic would be significantly worsened by diversion to fewer key remaining interchanges and feeder streets, particularly during peak times. This may result in unintended impacts to historic districts, particularly properties beyond the immediate footprint of the interstate that experience heightened traffic detouring and local congestion. It may be worth giving further consideration to Alternative 4B, which provides many of the minimization elements of Alternative 4C while also preserving local access to the fullest extent with all existing ramps remaining open.

The retention of all current interchanges and movements and/or addition of interchanges should be further analyzed to ensure sufficient local access for businesses and residents, uniform dispersion of traffic, avoidance of excessive detouring through the city, and to provide alternative routes for exit or highway closures and other emergency situations (which seem to happen with some frequency).

Comment acknowledged regarding Alternative 4c responsiveness to comments from consulting parties and the recognition that the recommended combination of shorter walls, with some regrading of the embankments, and inclusion of other context sensitive design solutions in Alternatives 4b and 4c is a good strategy to minimize impact to historic properties within the area of potential effects.

More detailed traffic studies were initiated as the Alternatives Screening Report was completed, with a focus on traffic increases on local streets with the refined preliminary preferred Alternative 4c, and traffic impacts will be addressed in the EA. Results of current traffic studies are discussed in Attachment C of this letter. Due to public concern about widening of pavement and tall retaining walls, INDOT has eliminated Alternative 4b, which accommodates all existing movements, but has more pavement widening and taller walls, from further consideration. [Note: Subsequent to the Alternatives Screening Report, the preliminary preferred alternative was refined so I-65 southbound will connect to the C-D road as it does now, and the entrance ramp at Delaware Street will not connect to the C-D road. The

<p><i>We note that allowing travelers to enter or exit at a point closest to their intended destination improves efficiency and reduces overall street congestion throughout the city. Satisfactory level of service, safety, and avoidance of gridlock and traffic backups are a shared concern for downtown residents, businesses, workers and commuters alike; however, these goals must be balanced against potential environmental impacts including the use and protection of historic resources immediately adjacent to and beyond the project area. It is our understanding that all of these issues will continue to be considered as part of this process.</i></p> <p><i>Furthermore, we note the historic property report addendum. We concur with the conclusions of the addendum regarding the eligibility and ineligibility of the identified resources in the expanded area of potential effects.</i></p> <p><i>In regard to archaeological resources within the proposed project area, it is our understanding, from Harry Nikides's (ASC Group, Inc.) October 26, 2018, e-mail message to Wade Tharp (INDNR-DIPA), that an archaeological report will be provided to our office in coming weeks. We will await a full report of the archaeological investigations for our review and comment. Once this information has been received, the Indiana SHPO will resume identification and evaluation procedures for this project.</i></p> <p><i>If you have questions about archaeological issues please contact Wade Tharp at (317) 232-1650 or wtharpl@dnr.IN.gov. If you have questions about buildings or structures please contact Chad Slider at (317) 234-5366 or cslider@dnr.IN.gov.</i></p>	<p><i>Delaware Street ramp will only connect to I-70 eastbound.]</i></p> <p><i>The trade-offs of traffic service versus impacts and the rationale for selecting Alternative 4c as the preliminary preferred alternative are described in the Alternatives Screening Report. Traffic service and environmental impacts, including the protection of historic resources will continue to be considered throughout the project development process.</i></p> <p><i>Comment acknowledged regarding concurrence with conclusions in the historic property addendum.</i></p> <p><i>The Phase Ib Archaeological Records Check and Reconnaissance Survey report was submitted to the SHPO for their review and comment on December 14, 2018. The SHPO concurred with the recommendations of the report in a letter dated January 25, 2019.</i></p>
<p>Indiana Chapter of the American Institute of Architects – Mark Beebe – 10/29/2018</p>	
<p><i>The Indiana Chapter of the American Institute of Architects (AIA Indiana) thanks the State of Indiana for encouraging citizens to participate and comment on the North Split. We are serious about collaborating with INDOT on achieving a solution that improves transportation, connectivity, economic development, and social equity in Indianapolis. Towards that end we respectfully attach a letter with our comments on the INDOT Alternatives Screening Report dated September 21, 2018.</i></p> <p><i>The Indiana Chapter of the American Institute of Architects (AIA Indiana) thanks the State of Indiana for encouraging citizens of the region to form a grand but achievable vision of something all Hoosiers can be proud of for the next 50 years. The Capital City needs this major defining infrastructure element to become an inspiring project that can fuel real urban progress that our leaders and our citizens can say is an example for the rest of the country of what is best in urban design and execution. We pledge the financial, political and civic power/collaboration/cooperation of the Coalition to work night and day with INDOT to get to that aspirational place.</i></p> <p><i>We are serious about collaborating for a solution that befits the Hoosier State and that becomes a model for other States. Towards that end we</i></p>	

respectfully provide the following comments on the INDOT Alternatives Screening Report dated September 21, 2018.

1.0 Purpose and Need Statement

The purpose and need statement accurately includes condition, safety and congestion. However, we believe there are gaps in the statement that still require attention to fully address the significance of this project.

Comments:

a. Logical Termini

1. The Alternatives Screening Report Purpose and Need statement is for a narrowly defined project area that does not address logical termini adequately (FHWA defines logical termini as rational end points for a project such as a major crossroads or traffic generator). A project may be phased but it must fully consider true logical termini. The east end of the Alabama Street bridge and Meridian Street ramps are convenient rather than logical termini.

2. Logical termini define the level of potential environmental effects. In this case the West Street interchange should be the logical terminus (as a major traffic generator/major crossroads) and should also be included within the Area of Potential Effect (APE) of Section 106 review for this project. Otherwise the project, as currently proposed, still appears to fall under FHWA's definition of Project Segmentation.

3. We base these comments on the 2016 Project Intent Report which makes it clear that INDOT saw the interchange as part of a larger project that was being broken up just for funding and construction convenience. Specifically, page 16 of the 2016 Project Intent Report states:

"Depending on how the 3 separate project units are advanced/funded (altogether or incrementally), it may be acceptable to conduct interchange IAR's [Interstate Access Request's] in steps or phases. For a variety of reasons, including sheer scale and cost, the 3 sections of this work are most likely to be advanced separately, though design must be coordinated closely.at this time, the order of the 3 sections completion should be (1) the North Split interchange bounded by

Comment noted regarding accuracy of statements regarding condition, safety, and congestion, and suggesting other considerations.

Logical termini are determined based on a number of factors, including construction considerations. Logical termini for this project were established in cooperation with FHWA to meet NEPA requirements and to meet the specific needs of this project.

Logical termini do not limit the area to be reviewed for potential impacts. The traffic study area extends well beyond the project area, and it includes the West Street interchange along with large areas of downtown and the surrounding neighborhoods. The project does not include construction at the West Street interchange and the traffic analysis discussed in this letter and Attachment C does not recommend an expansion of the Area of Potential Effect (APE) to include the West Street interchange. According to FHWA guidance, segmentation may occur when project sponsors discuss the environmental issues and transportation need of only a segment of a corridor. In this case, purpose and need is defined in terms of safety, congestion, bridge condition, and pavement condition within the North Split interchange. The project limits include the North Split interchange and distance along the interstates necessary to meet the purpose and need of this project.

The Project Intent Report is a preliminary planning document that identifies potential future projects. Engineering observations in a project intent report are conceptual, and all conclusions or recommendations are subject to adjustment based on more detailed phases, such as the NEPA process.

Vermont Street, Central Avenue, and Commerce Avenue, (2) I-65 near Northside from Central Avenue to Fall Creek, and (3) I-70 near Eastside from Commerce Avenue to I-465 East Leg.”

4. Based on this statement from the 2016 Project Intent Report, we believe the project should require an EIS instead of only an EA level of environmental study unless this is fully addressed prior to submission to FHWA.

b. Cumulative Impacts

Reconstructing a critical segment of the downtown interstate system as proposed in the Alternatives Screening Report perpetuates the disruption and fragmentation that resulted from the original construction. FHWA has the responsibility to address and consider direct, indirect and cumulative impacts in the NEPA process. INDOT’s approach circumvents FHWA’s responsibility to address the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR § 1508.7)

c. Financing

The Tolling Implementation Study currently underway should inform Inner Loop rebuild strategies to include logistics infrastructure and the potential revenue resources from tolling that could impact design, project extents and logical termini. The current project is based on available local funds to match federal dollars, which has thus constrained the project from a comprehensive approach.

Comments:

2.0 Proposed Performance Measures shown in Table 5-7, page 5-9

- a. This table reveals that the preferred Alternative 4C design does not address the fundamental design flaw of the existing system: the commingling of local and through traffic throughout the inner loop with significant impacts on logistic traffic. To address this issue, we request that your study examine an additional alternative to resolve this issue: separation of local destination traffic from freeway-to-freeway interstate traffic, with a new local arterial distributor system established at the surface level to connect with the local street grid.*
- b. Closures of Collector Distributor access points: Alternative 4C proposes elimination of some connections to local streets to resolve some safety and congestion issues. We believe these closures will displace those issues to other locations with unpredicted impacts not addressed in the Alternatives Screening Report. We believe the Area of Potential Effects (APE) should be expanded to include the exit/entry areas that may be impacted, such as West Street and Fletcher Ave.*

The determination of the type of study (class of action) to be conducted was made in consultation with FHWA to meet NEPA requirements and to meet the specific needs of this project. The purpose of an Environmental Assessment (EA) is to determine if an Environmental Impact Statement (EIS) is necessary or if there will not be significant impacts resulting from the project.

INDOT and FHWA will address direct, indirect, and cumulative impacts in the EA.

On November 29, 2018 Governor Holcomb announced that state will not move forward with a plan to toll Indiana’s interstate highways. There is no current study regarding tolling I-65 or I-70.

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 Alternatives Screening Report reviewed alternatives for the North Split interchange based on the purpose and need of the project.

The Alternatives Screening Report reviewed alternatives for the North Split interchange and connecting roadways within the project area for the interchange. [Note: Subsequent to the Alternatives Screening Report, the preliminary preferred alternative was refined so I-65 southbound connects to the C-D road and the entrance ramp at Delaware Street does not. The Delaware Street ramp will only connect to I-70 eastbound.] More detailed traffic studies were

<p><i>We support measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10 year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but also removes the visual and physical connectivity divides between the existing historic neighborhoods.</i></p> <p>3.0 Traffic Mobility Comments Comments:</p> <ul style="list-style-type: none"> <i>a. Chapter 2 of the attached ARUP Strategic Advisory states that the proposed connectivity and accessibility changes outlined in the INDOT Alternatives Screening Report will change travel patterns for thousands of vehicles in the downtown area. This alternative pathing would divert some vehicles to travel longer distances on local streets and others to travel longer distances on the Interstate system. In either case, these diversions could add several minutes and vehicle miles traveled to peak period trips as well as create congestion points elsewhere in the local street grid. We believe this issue can be resolved by a better pairing of the interstate and local grid within the existing corridor and would like these alternatives to be fully explored.</i> <p>4.0 Economic Development Potential Comments:</p> <ul style="list-style-type: none"> <i>a. The INDOT Proposal is not compatible with the Coalition's principles of promoting and enhancing economic development potential. The Rethink Coalition desires to create new mixed-use development districts from relinquished interstate right-of-way space that could be made available by a reduced interstate footprint.</i> <i>b. The Rethink 65/70 Coalition requests INDOT redesign the northside leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.</i> <i>c. Chapter 3 of the attached ARUP Strategic Advisory shows that over 38.7 acres of new area can be gained on the northside segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially generating over 1000 residential units and 1.6M square feet of commercial space.</i> 	<p><i>initiated as the Alternatives Screening Report was completed, with a focus on traffic increases on local streets with the refined preliminary preferred Alternative 4c and traffic impacts will be addressed in the EA. Results of current traffic studies are referred to in Attachment C of this letter. It concluded the APE should not be expanded based on permanent traffic changes.</i></p> <p><i>As documented in the Alternatives Screening Report, 27 bridges are estimated to have less than 10 years of remaining life. Of these, 11 bridges are estimated to have 5 years of remaining life. Seven of these bridges underwent immediate repair in 2018/2019 to allow continued operation until the North Split project is completed. "Stabilizing" these 27 bridges for a 5- to 10-year period while further system studies are conducted is not practical.</i></p> <p><i>See response on page 9 regarding the detailed traffic impact studies being conducted as part of the North Split interchange EA process.</i></p> <p><i>See response on page 12 regarding the review of inner loop options in the previously prepared System-Level Analysis of Downtown Interstates.</i></p> <p><i>See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</i></p> <p><i>See response on page 12 regarding the review of inner loop options in the previously prepared System-Level Analysis of Downtown Interstates.</i></p>
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- d. A primary benefit to INDOT is that a reduced footprint, depressed highway, absent multiple ramps, would be a more efficient and cost-effective project that also generates significant community benefit. This model could be extended across the remaining inner loop segments that are planned to be reconstructed.

5.0 Connectivity Comments

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's principles of connectivity for all modes. The Rethink Coalition has studied the development of a parallel three-lane low-speed surface collector/distributor system to restore grid connectivity within the existing INDOT corridor.
- b. The Coalition's concept will provide multimodal balance between pedestrian, bicycle, transit and automobile accommodation with local access to new frontage development, including curbside parking and delivery and an urban parkway aesthetic with a street tree canopy continuum and buffer.
- c. The Coalition's concept will also reduce congestion and delay for commuters currently caused by backups on local streets at exit/entry ramps. By restoring the street grid, commuters will find multiple ways to move toward their destinations and continue their journey and avoid congestion points.
- d. By shrinking the footprint of the interstate, a continuous transit connector and multimodal path can be accommodated within the relinquished real estate to provide mobility to populations that travel without a car.
- e. There is growing evidence of the effectiveness of local grid connectivity to reduce congestion in many US cities that have, or are planning to, reconstruct their interstates.

6.0 Economic/Social Justice Comments

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's goals of equitable transportation and urban growth as it will concentrate additional traffic and congestion at the West Street interchange, exacerbating the current congestion that occurs on the local street grid in the adjacent historically African American neighborhood.

7.0 Preferred Alternate 4C

Comments:

- a. Alternative 4C proposes eliminating access at Meridian/Pennsylvania and Meridian/Delaware Ramps from I-70 westbound traffic and the Ohio/Michigan exits via the collector-distributor ramp from I-70 proposal. We find it unacceptable that access to the downtown core at Monument Circle would no longer be available to thousands of travelers. We believe this will impact commuters, visitors and residents by adding time and vehicle miles traveled to their trips and deter economic development in downtown.

See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.

See response on page 12 regarding the review of inner loop options in the previously prepared System-Level Analysis of Downtown Interstates.

See response on page 5 regarding the Context Sensitive Solutions (CSS) process being carried out as part of the North Split NEPA process.

See response on page 9 regarding the detailed traffic impact studies being conducted as part of the North Split interchange EA process.

Environmental justice will be addressed in the EA.

Access to downtown destinations is not "lost" since numerous route options will still be available. See the response on page 9 regarding the detailed traffic impact studies being conducted as part of the North Split interchange EA process. **[Note: Movements eliminated by Alternative 4c are not described accurately in the comment. In any case, subsequent to the Alternatives Screening Report, the preliminary preferred alternative was refined so I-65 southbound connects to the C-D road and the**

<p>b. <i>Retaining Walls: The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, and the Mass Ave Commercial District, all listed on the National Register of Historic Places. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</i></p> <p>c. <i>Added pavement width: the additional pavement width exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods.</i></p> <p>8.0 Agreement on Design Interventions and the Section 106 Process <i>Any design interventions agreed to through the Section 106 process should be thoroughly developed and incorporated into bidding documents. The “Design Build Best Value” process should not be allowed to reject any agreed upon measures due to cost during construction.</i></p>	<p><i>entrance ramp at Delaware Street does not. The Delaware Street ramp will only connect to I-70 eastbound.]</i></p> <p><i>The addition of retaining walls will neither create new barriers nor enlarge existing barriers because the overall height and length of the walls will be the same as the existing embankments. Effects to historic properties will be assessed as part of the Section 106 process in consultation with consulting parties.</i></p> <p><i>The existing roadway footprint is widened and retaining walls are proposed on the west leg in Alternative 4c, as described in the Alternatives Screening Report. Alternative 4c is not within the existing pavement footprint and does not eliminate retaining walls. A different alternative, Alternative 4a, would accomplish these objectives, albeit with the trade-off of lost access to the immediate area via Delaware Street and Pennsylvania Street ramps. The trade-offs and the rationale for selecting Alternative 4c as the preliminary preferred alternative are described in the Alternatives Screening Report.</i></p> <p><i>Potential means of mitigating effects of the longer bridge spans will be addressed in cooperation with adjacent communities in the CSS process. See response on page 5 regarding the Context Sensitive Solutions (CSS) process being carried out as part of the North Split NEPA process.</i></p> <p><i>If mitigation measures are required to address Section 106 adverse effects, they will be included as firm commitments in the contract documents.</i></p>
<p>St. Joseph Neighborhood Association – Pete Haupers – 10/29/2018</p> <p>St. Joe is finalizing our comments for today's deadline. We hope to have them to you by the end of the day, however wanted to reach out and ask if we could please have a short extension until tomorrow at the latest?</p>	<p>Sure, that is fine.</p>
<p>St. Joseph Neighborhood Association – Pete Haupers – 10/30/2018</p> <p><i>The St. Joseph Historic Neighborhood thanks the HNTB Project Team for their efforts since the series of meetings on the System Level Analysis in May 2018. In September, we were surprised to learn that the seven concepts had developed into one INDOT preferred alternative (4C). We were expecting a thorough review of several high quality alternatives. We believe there are more concerns to be addressed, but most importantly, we believe this project requires an Environmental Impact</i></p>	<p><i>At the end of the System-Level Analysis INDOT announced they were moving forward with the North Split project. Alternatives were then developed for the North Split project, not the entire downtown interstate system.</i></p> <p><i>The determination of the type of study (class of action) to be conducted was made in consultation</i></p>

<p><i>Study (EIS) rather than the minimum Environmental Assessment (EA) level of environmental consideration.</i></p> <p><i>Please find our commentary on the INDOT Alternatives Screening Report:</i></p> <p><i>Lack of High Quality Alternatives:</i> <i>In May, we were shown seven concepts. In September, we were shown four poor quality alternatives and one preferred alternative. Although they likely met the technical definition of an alternative, we would argue that several of these alternatives were designed to not be selected which hinders the integrity of the alternatives process. To have three of five not even meet the Purpose & Need is not a quality selection. The alternative selection process was not the objective exercise we had hoped. It appeared like an obvious multiple-choice question:</i></p> <p><i>Alternative 1 – No Build: A baseline is not an alternative, nor should it be treated like one. A baseline is inherent in any scientific analysis as a control group. Any alternative would look better than letting the bridges collapse.</i></p> <p><i>Alternative 2 – TSM: In the System Level Analysis, this concept was discussed and several comments indicated that TSM could be incorporated into another concept to be a true alternative. We understand that tolls cannot repair infrastructure. This is not a stand-alone alternative.</i></p> <p><i>Alternative 3 – In Kind Interchange: This is what Alternative 1 should have been.</i></p> <p><i>Alternative 4 – Efficient Interchange: We consider the three sub-alternatives to be the only worth consideration among the five.</i></p> <p><i>Alternative 5 – Full Interchange: It is felt this alternative was added to simply announce that through lanes were no longer in consideration. We thank the Project Team for eliminating this, as it was the most destructive to our Neighborhood.</i></p> <p><i>Recent Focus on Safety to Support Alternative 4C:</i> <i>The recent Alternatives Screening meetings have begun with a heavier focus on safety as compared to prior meetings. It was felt that the Project Team was attempting to rebrand the Project’s original purpose from repairing infrastructure to safety. While we agree that safety is a critical aspect of the Project and should be prioritized, the level of focus on safety at this time is meant to support Alternative 4C. Safety is an important inherent component to this Project, not the sole reason for the Project.</i></p> <p><i>Project Team’s Lack of Consideration for the ARUP Study:</i></p>	<p><i>with FHWA. The purpose of an EA is to determine if an EIS is necessary or if there will not be significant impacts resulting from the project.</i></p> <p><i>As is typical with many screening processes, a wide range of potential alternatives was considered and narrowed to a few to insure options were not overlooked and to allow the focus of refinements for the most promising options.</i></p> <p><i>The NEPA process requires the No Build alternative be included in the analysis.</i></p> <p><i>The NEPA process requires the TSM alternative be included in the analysis.</i></p> <p><i>Replacing the bridges and pavement within the project is not a No Build alternative. Alternative 3 was included because it was brought up at several neighborhood meetings and in public comments.</i></p> <p><i>Alternative 5 best meets the purpose and need of the project. It is similar to what was identified in the 2016 Project Intent Report. It was eliminated due to impacts and public input.</i></p> <p><i>Improving safety was always an important project objective. It was identified in the purpose and need in the September 19, 2017 letter to consulting parties and the October 18, 2017 early coordination letter to resource agencies. As technical studies of accident history were refined, the most hazardous locations received greater scrutiny. Ultimately, as emphasis on congestion relief and reserve capacity receded, safety became the primary driver in the analysis of interchange operations.</i></p> <p><i>See the response on page 2 regarding the independent study presented by the Rethink</i></p>
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<p><i>During the meeting, members of the Rethink 65-70 Coalition asked an HNTB Project Team Member how the ARUP Study would be used by the Project Team. The response was that it would be a “highly relevant public comment”. It is felt that more weight should be given to this study because it provides the critical information not addressed in the INDOT System Level Analysis.</i></p> <p><i>Missed Opportunity to Learn from INDOT’s Summer I-65/I-70 Closures:</i> <i>INDOT closed sections of I-65/I-70 this summer. At the 10/9/18 CAC Meeting, we asked if any study had been completed to see where traffic dispersed during this time in order to provide actual data (not model analyses) on how to plan for the impending years of construction. The response from a Project Team Member indicated that no analysis had been performed, no relevant data had been gathered, and no comparisons to the HNTB model had been made to study accuracy. Big miss.</i></p> <p><i>Please find our additional commentary:</i> <i>Towards that end we respectfully provide the following comments on the INDOT Alternatives Screening Report dated September 21, 2018.</i></p> <p><i>1.0 Purpose and Need Statement</i> <i>The purpose and need statement accurately includes condition, safety and congestion. However, we believe there are gaps in the statement that still require attention.</i> <i>Comments:</i> <i>a. The Alternatives Screening Report Purpose and Need statement is for a narrowly defined project area that does not address logical termini adequately (FHWA defines logical termini as rational end points for a project such as a major crossroads or traffic generator). A project may be phased but it must fully consider true logical termini. This is most notable by using the east end of the Alabama Street bridge and Meridian Street ramps as convenient rather than logical termini.</i> <i>b. Logical termini define the level of potential environmental effects. In this case the West Street interchange should be the logical terminus (as a major traffic generator/major crossroads) and should also be included within the Area of Potential Effect (APE) of Section 106 review for this project. Otherwise the project, as currently proposed, appears to meet FHWA’s definition of Project Segmentation.</i> <i>c. We base these comments on the 2016 Project Intent Report which makes it clear that INDOT saw the interchange as part of a larger project that was being broken up just for funding and construction convenience. Specifically, page 16 of the 2016 Project Intent Report states “Depending on how the 3 separate project units are advanced/funded (altogether or incrementally), it may be acceptable to conduct interchange IAR’s in steps of phases. For a variety of reasons, including sheer scale and cost, the 3 sections of this work are most likely to be advanced separately, though design must be coordinated</i></p>	<p><i>Coalition and ARUP Corporation in November 2018.</i></p> <p><i>See response on page 12 regarding the review of inner loop options in the previously prepared System-Level Analysis of Downtown Interstates.</i></p> <p><i>INDOT does have traffic counts available from the period of closure. The data had not been analyzed in October of 2018, but it may be used in future studies. Closure of the North Split interchange will not have the same impacts to traffic as the closure of the portion of I-65 northwest of the project area over the summer of 2018.</i></p> <p><i>See response to these comments on pages 11 and 12.</i></p>
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closely.at this time, the order of the 3 sections completion should be (1) the North Split interchange bounded by Vermont Street, Central Avenue, and Commerce Avenue, (2) I-65 near Northside from Central Avenue to Fall Creek, and (3) I-70 near Eastside from Commerce Avenue to I-465 East Leg.” **Based on this statement from the 2016 Project Intent Report, we believe the project should require an EIS instead of only an EA level of environmental study.**

d. Reconstructing a critical segment of the downtown interstate system as proposed in the Alternatives Screening Report perpetuates the disruption and fragmentation that resulted from the original construction. This approach not only misses the opportunity to correct past mistakes but overlooks the larger economic development and connectivity opportunities presented as the larger system is sequentially rebuilt from the ground up.

2.0 Proposed Performance Measures shown in Table 2-4, page 2-15

Comments:

a. This table reveals that the preferred Alternative 4C design does not address the fundamental design flaw of the existing system: the commingling of local and through traffic throughout the inner loop. To address this issue, we request that your study examine an additional alternative to resolve this issue. We recommend that local destination traffic be separated from freeway-to-freeway interstate traffic and that a new local arterial distributor system be established at the surface level that connects with the local street grid.

b. Closures of Collector Distributor access points: Alternative 4C proposes elimination of some connections to local streets to resolve some safety and congestion issues. We believe these closures will displace those issues to other locations with unpredicted impacts not addressed in the Alternatives Screening Report. The impacts beyond the project limits should be identified and remedied. For example, the West Street and Fletcher Place entrances/exits are in or adjacent to historic districts and should be considered in the APE.

c. Bridge Condition & Remaining Service Life: the community supports measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10 year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but also removes the visual and physical connectivity divides between existing neighborhoods.

3.0 Traffic Mobility Comments

Comments:

a. Chapter 2 of the attached ARUP Strategic Advisory states that the proposed connectivity and accessibility changes outlined in the INDOT Alternatives Screening Report will change travel patterns for thousands of vehicles in the downtown area. This alternative pathing would divert some vehicles to travel longer distances on local streets and others to travel longer distances on the Interstate system. In either case, these diversions could add several minutes and vehicle miles traveled to peak period trips as well as create congestion points elsewhere in the local street grid. We believe this issue can be resolved

See response to these comments on pages 12 and 13.

See response to these comments on page 13.

by a better pairing of the interstate and local grid within the existing corridor and would like these alternatives to be fully explored.

4.0 Economic Development Potential

Comments:

a. The INDOT Proposal is not compatible with the Coalition's principles of promoting and enhancing economic development potential. The Rethink Coalition desires to create new mixed-use development districts from relinquished interstate right-of-way space that could be made available by a reduced interstate footprint.

b. The Rethink 65/70 Coalition requests INDOT redesign the north side leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.

c. Chapter 3 of the attached ARUP Strategic Advisory shows that over 38.7 acres of new area can be gained on the north side segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially generating over 1000 residential units and 1.6M square feet of commercial space.

d. A primary benefit to INDOT is that a reduced footprint, depressed highway, absent multiple ramps, would be a more efficient and cost-effective project that also generates significant community benefit. This model could be extended across the remaining inner loop segments that are planned to be reconstructed.

5.0 Connectivity Comments

Comments:

a. The INDOT Proposal is not compatible with the Coalition's principles of connectivity for all modes. The Rethink Coalition has studied the development of a parallel three-lane low-speed surface collector/distributor system to restore grid connectivity within the existing INDOT corridor.

b. This will provide multimodal balance between pedestrian, bicycle, transit and automobile accommodation with local access to new frontage development, including curbside parking and delivery and an urban parkway aesthetic with a street tree canopy continuum and buffer.

c. This system will also reduce congestion and delay for commuters currently caused by backups on local streets at exit/entry ramps. By restoring the street grid, commuters will find multiple ways to move toward their destinations and continue their journey and avoid congestion points.

d. By shrinking the footprint of the interstate, a continuous transit connector and multimodal path can be accommodated within the relinquished real estate to provide mobility to populations that travel without a car.

e. There is growing evidence of the effectiveness of local grid connectivity to reduce congestion in many US cities that have, or are planning to, reconstruct their interstates.

6.0 Economic/Social Justice Comments

Comments:

See response to these comments on pages 13 and 14.

See response to these comments on page 14.

See response to these comments on page 14.

<p><i>a. The INDOT Proposal is not compatible with the Coalition's goals of equitable transportation and urban growth as it will concentrate additional traffic and congestion at the West Street interchange, exacerbating the current congestion that occurs on the local street grid in the adjacent historically African American neighborhood.</i></p> <p>7.0 Preferred Alternate 4C Comments:</p> <p><i>a. Access at Meridian/Pennsylvania and Meridian/Delaware Ramps would no longer be available from I-70 westbound traffic proposal: we find it unacceptable that access to Indianapolis' primary street to the downtown core at Monument Circle would no longer be available to thousands of travelers. We believe this will impact commuters, visitors and residents by adding time and vehicle miles traveled to their trips.</i></p> <p><i>b. Retaining Walls: The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, all listed on the National Register of Historic Places, in addition to impacting specific national register structures. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</i></p> <p><i>c. Added pavement width: the additional pavement width exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods.</i></p>	<p><i>See response to these comments on pages 14 and 15.</i></p>
<p>Cottage Home BOD – Jim Jessee – 10/29/2018</p>	
<p><i>Please capture the Rethink Coalition's guiding principles for reconstruction of the North Split in a way that will set the stage for progressive, forward thinking construction of the north, east, and south legs of I-65/70 through downtown Indianapolis, specifically:</i></p> <ol style="list-style-type: none"> <i>1. No above grade walls</i> <i>2. No expansion of the existing number of through lanes</i> <i>3. Increased connectivity of neighborhoods and areas of commerce divided by the interstates</i> <i>4. Increased opportunities for inclusive economic development along the path of the interstates</i> <p><i>INDOT's preferred alternative 4c takes steps toward these goals, but still widens the footprint of the interstate's north leg through portions of a historic neighborhood, further cutting off a densely populated and vibrant area from the downtown core.</i></p> <p><i>INDOT's preferred alternative 4c eliminates some connections between I-65 and I-70 and local streets which will add even more congestion to the remaining exits and entrances to the interstates especially at peak periods.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report which calls for depressing the I-65 and I-70 with local destination traffic being separated from freeway-to-freeway traffic to better connect with the local street grid.</i></p>	<p><i>See response to a similar comment regarding the four guiding principles on page 2.</i></p> <p><i>See response to similar comment regarding an additional barrier due to a widened footprint on page 15.</i></p> <p><i>See response to similar comment regarding detailed study of traffic changes on page 9.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p>

<p><i>The reconstruction of the North Split should be largely depressed below grade to allow for the more efficient reconstruction of depressed legs of I-65 on the north leg, I-65/I-70 on the east leg, and I-70 on the south leg of the Inner Loop.</i></p> <p><i>INDOT's preferred alternative design does not address in adequate detail the economic development impact/potential of interstate right-of-way space in designated project areas.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report, which yields acres of new land for massive urban inclusive economic development.</i></p> <p><i>INDOT's segmented approach to reconstruction of the interstate precludes an integrated approach to the project that can fuel real urban progress in a way that sets an inspiring example of urban design and execution.</i></p> <p><i>We would like to see INDOT extend the first phase project boundary to at least include the West Street intersection and north interchange between I-65 and I-70.</i></p>	<p><i>The North Split project must be implemented soon to address safety concerns and replace deteriorating bridges and pavement. That means it must connect with the existing interstates, which are elevated. Therefore, directly accommodating future depressed highway designs in the current design is not physically possible. However, the interchange could be adjusted to accommodate depressed highways in the future by modifying these connections when and if the adjacent interstate legs are reconstructed.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the detailed traffic impact studies being conducted as part of the North Split interchange EA process on page 9.</i></p>
<p>Windsor Park Neighborhood Association, Land Use Committee – Jen Eamon & Aaron Kowalski – 10/29/2018</p>	
<p><i>The Land Use Committee of the Windsor Park Neighborhood Association, Inc., representing a historic neighborhood directly affected by this project and a listed consulting party, has concluded (after attending meetings, internal discussion at several regularly scheduled neighborhood meetings and review of both HUNI Rethink Coalition Findings and City-County Council Resolution #34), that the following is an appropriate response in regard to plan 4C, to the I65/I70 project. We encourage INDOT to adopt a plan that satisfies City Council Resolution #34 and that addresses the concerns raised by DNR regarding additional traffic on our city streets caused by removing access points to I65, a plan that will repair infrastructure but minimizes expansion of scale and potential noise, air quality, and visible intrusions into the Windsor Park Neighborhood and which maintains and improves existing connectivity. As a neighborhood currently undergoing re-development but which experienced decades of disinvestment directly related to the original construction of the inner loop, we see this project as a rare opportunity to right some of the wrongs made by the original interstate planners.</i></p> <p><i>The Capital City needs this major defining infrastructure element to become an inspiring project that can fuel real urban progress that is an</i></p>	

<p><i>example for the rest of the country of what is best in urban design and execution. We are serious about collaborating for a solution that benefits our neighborhoods, our City, our State and that becomes a model for other States.</i></p> <p><i>INDOT should consider all the recommendations of the Rethink 65/70 coalition. INDOT should work closely with the City of Indianapolis and Mayor Hogsett. INDOT should reach out to former Mayor Coleman and current Mayor Ginther, from Columbus, Ohio, to understand how they as a community worked with ODOT to reach a consensus and cost share solution for I-70 interchanges and overpasses/underpasses throughout that City.</i></p> <p><i>Towards that end we respectfully provide the following comments on the INDOT Alternatives Screening Report dated September 21, 2018.</i></p> <p><i>1.0 Purpose and Need Statement</i> <i>The purpose and need statement accurately includes condition, safety and congestion. However, we believe there are gaps in the statement that still require attention to fully address the significance of this project.</i></p> <p><i>Comments:</i></p> <p><i>a. Logical Termini</i></p> <p><i>1. The Alternatives Screening Report Purpose and Need statement is for a narrowly defined project area that does not address logical termini adequately (FHWA defines logical termini as rational end points for a project such as a major crossroads or traffic generator). A project may be phased but it must fully consider true logical termini. The east end of the Alabama Street bridge and Meridian Street ramps are convenient rather than logical termini.</i></p> <p><i>2. Logical termini define the level of potential environmental effects. In this case the West Street interchange should be the logical terminus (as</i></p>	<p><i>See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</i></p> <p><i>INDOT and the project team have worked closely with the City of Indianapolis throughout the North Split NEPA process, including regular meetings with the Office of the Mayor and department heads involved with planning and infrastructure. Mayor Hogsett referred to local collaboration when he issued the following supportive statement regarding the preliminary preferred alternative on September 28, 2018, “This preliminary design is a testament to the legitimate concerns of Indianapolis neighborhoods who have felt the generational impact of the urban interstate system, and INDOT’s genuine willingness to listen and ensure their plans reflected that feedback. Residents should be encouraged by this kind of collaboration, and we can be proud of the initial plans it has resulted in. I want to thank Commissioner Joe McGuinness for his continued work to bring this much-needed project to fruition, and I applaud the community groups who have tirelessly advocated city and state officials to ensure this infrastructure investment does not impede the livability and growth of our urban neighborhoods.”</i></p> <p><i>See response to these comments on pages 11 and 12.</i></p>
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a major traffic generator/major crossroads) and should also be included within the Area of Potential Effect (APE) of Section 106 review for this project. Otherwise the project, as currently proposed, still appears to fall under FHWA's definition of Project Segmentation.

3. We base these comments on the 2016 Project Intent Report which makes it clear that INDOT saw the interchange as part of a larger project that was being broken up just for funding and construction convenience. Specifically, page 16 of the 2016 Project Intent Report states:

"Depending on how the 3 separate project units are advanced/funded (altogether or incrementally), it may be acceptable to conduct interchange IAR's [Interstate Access Request's] in steps or phases. For a variety of reasons, including sheer scale and cost, the 3 sections of this work are most likely to be advanced separately, though design must be coordinated closely.at this time, the order of the 3 sections completion should be (1) the North Split interchange bounded by Vermont Street, Central Avenue, and Commerce Avenue, (2) I-65 near Northside from Central Avenue to Fall Creek, and (3) I-70 near Eastside from Commerce Avenue to I-465 East Leg."

4. Based on this statement from the 2016 Project Intent Report, we believe the project should require an EIS instead of only an EA level of environmental study unless this is fully addressed prior to submission to FHWA.

b. Cumulative Impacts

Reconstructing a critical segment of the downtown interstate system as proposed in the Alternatives Screening Report perpetuates the disruption and fragmentation that resulted from the original construction. FHWA has the responsibility to address and consider direct, indirect and cumulative impacts in the NEPA process. INDOT's approach circumvents FHWA's responsibility to address the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR § 1508.7)

c. Financing

The Tolling Implementation Study currently underway should inform Inner Loop rebuild strategies to include logistics infrastructure and the potential revenue resources from tolling that could impact design, project extents and logical termini. The current project is based on available local funds to match federal dollars, which has thus constrained the project from a comprehensive approach.

Comments:

3.0 Proposed Performance Measures shown in Table 5-7, page 5-9

- a. This table reveals that the preferred Alternative 4C design does not address the fundamental design flaw of the existing system: the commingling of local and through traffic throughout the inner loop with significant impacts on logistic traffic. To address this issue, we request that your study examine an

See response to these comments on page 12.

See response to this comment on page 12.

additional alternative to resolve this issue: separation of local destination traffic from freeway-to-freeway interstate traffic, with a new local arterial distributor system established at the surface level to connect with the local street grid.

- b. Closures of Collector Distributor access points: Alternative 4C proposes elimination of some connections to local streets to resolve some safety and congestion issues. We believe these closures will displace those issues to other locations with unpredicted impacts not addressed in the Alternatives Screening Report. We believe the Area of Potential Effects (APE) should be expanded to include the exit/entry areas that may be impacted, such as West Street and Fletcher Ave.*
- c. We support measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10 year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but also removes the visual and physical connectivity divides between the existing historic neighborhoods.*

3.0 Traffic Mobility Comments

Comments:

- a. Chapter 2 of the attached ARUP Strategic Advisory states that the proposed connectivity and accessibility changes outlined in the INDOT Alternatives Screening Report will change travel patterns for thousands of vehicles in the downtown area. This alternative pathing would divert some vehicles to travel longer distances on local streets and others to travel longer distances on the Interstate system. In either case, these diversions could add several minutes and vehicle miles traveled to peak period trips as well as create congestion points elsewhere in the local street grid. We believe this issue can be resolved by a better pairing of the interstate and local grid within the existing corridor and would like these alternatives to be fully explored.*

See response to these comments on page 13.

4.0 Economic Development Potential

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's principles of promoting and enhancing economic development potential. The Rethink Coalition desires to create new mixed-use development districts from relinquished interstate right-of-way space that could be made available by a reduced interstate footprint.*
- b. The Rethink 65/70 Coalition requests INDOT redesign the northside leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.*
- c. Chapter 3 of the attached ARUP Strategic Advisory shows that over 38.7 acres of new area can be gained on the northside segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially generating over 1000 residential units and 1.6M square feet of commercial space.*

See response to these comments on pages 13 and 14.

- d. A primary benefit to INDOT is that a reduced footprint, depressed highway, absent multiple ramps, would be a more efficient and cost-effective project that also generates significant community benefit. This model could be extended across the remaining inner loop segments that are planned to be reconstructed.

5.0 Connectivity Comments

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's principles of connectivity for all modes. The Rethink Coalition has studied the development of a parallel three-lane low-speed surface collector/distributor system to restore grid connectivity within the existing INDOT corridor.
- b. The Coalition's concept will provide multimodal balance between pedestrian, bicycle, transit and automobile accommodation with local access to new frontage development, including curbside parking and delivery and an urban parkway aesthetic with a street tree canopy continuum and buffer.
- c. The Coalition's concept will also reduce congestion and delay for commuters currently caused by backups on local streets at exit/entry ramps. By restoring the street grid, commuters will find multiple ways to move toward their destinations and continue their journey and avoid congestion points.
- d. By shrinking the footprint of the interstate, a continuous transit connector and multimodal path can be accommodated within the relinquished real estate to provide mobility to populations that travel without a car.
- e. There is growing evidence of the effectiveness of local grid connectivity to reduce congestion in many US cities that have, or are planning to, reconstruct their interstates.

See response to these comments on page 14.

6.0 Economic/Social Justice Comments

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's goals of equitable transportation and urban growth as it will concentrate additional traffic and congestion at the West Street interchange, exacerbating the current congestion that occurs on the local street grid in the adjacent historically African American neighborhood.

See response to these comments on page 14.

7.0 Preferred Alternate 4C

Comments:

- a. Alternative 4C proposes eliminating access at Meridian/Pennsylvania and Meridian/Delaware Ramps from I-70 westbound traffic and the Ohio/Michigan exits via the collector-distributor ramp from I-70 proposal. We find it unacceptable that access to the downtown core at Monument Circle would no longer be available to thousands of travelers. We believe this will impact commuters, visitors and residents by adding time and vehicle miles traveled to their trips and deter economic development in downtown.
- b. Retaining Walls: The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old

See response to these comments on pages 14 and 15.

<p><i>Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, and the Mass Ave Commercial District, all listed on the National Register of Historic Places. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</i></p> <p><i>c. Added pavement width: the additional pavement width exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods.</i></p> <p><i>8.0 We support the City of Indianapolis Council Resolution No. 34; 2018 which states support of the Rethink I65/70 coalition and four guiding principles which state:</i></p> <ul style="list-style-type: none"> <i>- No above-Grade walls</i> <i>- No expansion of above-grade through lanes</i> <i>- Increased connectivity of neighborhoods and areas of commerce</i> <i>- Increased opportunities for inclusive economic development</i> 	<p><i>See response to a similar comment regarding the four guiding principles on page 2.</i></p>
<p>Interstate Business Group – Paul Knapp – 10/29/2018</p>	
<p><i>This submission is being made on behalf of the Interstate Business Group (IBG), a group of nearly 60 businesses and organizations along the path of I-65/I-70 who have come together over the last year after learning of INDOT's plans to completely reconstruct I-65 and I-70 in downtown Indianapolis. The members of IBG are listed below. IBG is a part of and joins in the concerns and objections to INDOT's new design (Alternative 4c) submitted or to be submitted by the Rethink 65/70 Coalition. We incorporate, as if recited here, all of Rethink Coalition's comments.</i></p> <p><i>In summary, without limitation, here are some of our major concerns with INDOT's preferred design Alternative 4c:</i></p> <ul style="list-style-type: none"> <i>• Although it has been said that Alternative 4c does not expand through lanes, the width of the interstate does indeed expand beyond the current width at a crucial point between two historic neighborhoods and encroaching ever closer to one of the crown jewels of our community, the Indiana Landmarks building.</i> <i>• Alternative 4c eliminates certain entrances and exits to the interstate thereby making certain commercial and non-commercial traffic more difficult AND also causing MORE congestion at the now fewer remaining entrances and exits to the downtown from the interstates. This fact really calls for INDOT to not approach the reconstruction of the Inner Loop in a segmented approach but more holistically.</i> <i>• We call on INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report which calls for depressing the I-65 and I-70 with local destination traffic being separated from freeway-to-freeway traffic to better connect with the local street grid. This also calls for the North Split to be largely depressed also.</i> <p><i>When the legs of the interstate are reconstruction as dictated by the Alternative 4c design of the North Split, it will yield very little</i></p>	<p><i>See response to similar comment regarding widening of the interstate footprint on page 4.</i></p> <p><i>See response to similar comment regarding detailed study of traffic changes on page 9.</i></p> <p><i>See responses to similar comments regarding the ARUP study and system-level changes proposals outside the project area on page 2.</i></p>

<p><i>opportunity for new land for economic development. This is a shortsighted design. The approach presented by Rethink/Arup will yield well over 50 acres of new land for economic development and permanent new jobs while reconnecting neighborhoods and commercial districts.</i></p>	<p><i>See the response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</i></p>
<p>Interstate Business Group – Paul Knapp – 10/29/2018</p>	
<p><i>On behalf of the Rethink 65/70 Coalition and its supporters, I am attaching the presentation deck we presented to the public on the evening of November 12th. You will see that it contains drawings depicting a new design concept for the north, east, and south legs of the Inner Loop interstates in downtown Indianapolis along with economic analysis provided by Arup Advisors which shows the enormous positive impact the Coalition’s design could have on Central Indiana for decades to come.</i></p> <p><i>We ask that the North Split Alternative 4c preliminary design that INDOT has designated as its preferred direction be modified during the final design stages so that it can accommodate the depressed highway design concept presented by the Rethink 65/70 Coalition and allow for the associated connectivity and economic development benefits.</i></p> <p><i>Finally, we would welcome the opportunity to meet with INDOT engineers and project managers, as well as INDOT’s outside engineers with HNTB, to work collaboratively to combine the North Split Alternative 4c preliminary design with the Coalition’s design.</i></p>	<p><i>See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</i></p> <p><i>See response on page 12 regarding the review of inner loop options in the previously prepared System-Level Analysis of Downtown Interstates.</i></p> <p><i>See response to similar comment regarding the future accommodation of depressed legs outside the interchange on page 21.</i></p>
<p>Indiana Landmarks – Marsh Davis – 10/30/2018</p>	
<p><i>Please see the attached letter from Marsh Davis sent on behalf of Indiana Landmarks regarding the North Split Alternatives Screening Report.</i></p> <p><i>I submit the following comments on behalf of Indiana Landmarks regarding the North Split Alternatives Screening Report.</i></p> <p><i>First, I want to be clear in expressing appreciation to the HNTB team and INDOT for listening to the concerns of the community and the numerous organizations, businesses, neighborhood associations, and the Rethink Coalition. Alternative 4c as depicted in the Screening Report represents a major improvement over the project’s earlier iterations. Thank you.</i></p> <p><i>We continue to have major concerns about some aspects of the direction the project is heading which I shall express in non-technical language. Alternative 4c does not adequately address the four principles agreed upon and set forth by the City, the Indy Chamber, and the Rethink Coalition. Of greatest concern to Indiana Landmarks is the widening of the west leg of the I-65 that passes on the south side of the Indiana Landmarks Center at 12th and Central. The last information I have from INDOT/HNTB calls for a 37-foot widening of the footprint of the interstate (22 feet on the north side) and the installation of walls, albeit shorter in height than originally planned. In those regards Alternative 4c falls short of containing the footprint and eliminating walls. It also fails to improve neighborhood connectivity. In fact, it further impedes connectivity. We therefore urge HNTB and INDOT to continue the</i></p>	<p><i>See response to similar comment regarding widening of the interstate footprint and constructing limited walls on page 4.</i></p>

<p><i>good work of refining the project to minimize to the extent possible any widening of the footprint and construction of walls.</i></p> <p><i>From a broader perspective—understanding constraints of funding and timing—we feel that segmenting the overall redesign of the interstate system around Indianapolis will reduce the possibilities of innovation in planning and design. Segmentation also holds the disadvantage of a less rigorous review of the multifaceted impacts of the project on our community.</i></p> <p><i>Indiana Landmarks was pleased to join community leaders, and the Indy Chamber and businesses in supporting the upcoming (November 12) visit to Indianapolis by Arup.</i></p> <p><i>This presents an extraordinary opportunity for all involved in planning the North Split and subsequent phases to interface with consultants of stellar international repute. We urge HNTB and INDOT to participate in these meetings and to take into account Arup’s findings as you continue work on the North Split project notwithstanding the public comment deadline of October 29.</i></p>	<p><i>See response to comment on page 27 regarding the urgency of repairing the interchange and the potential to accommodate future interstate modifications.</i></p> <p><i>See response to similar comment page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</i></p>
Historic Urban Neighborhoods of Indianapolis (HUNI) – Gary Chilluffo – 10/26/2018	
<p>With broadcasting the deadline for public comment to anyone who will listen ... ;) I'll get my personal and HUNI comments in tonight. I'm stuck in a meeting at moment.</p> <p>I'm sure after 5 pm was always permissible but just giving you a heads up.</p>	<p>Sure, that's fine.</p>
Historic Urban Neighborhoods of Indianapolis (HUNI) – Gary Chilluffo – 10/30/2018	
<p><i>Historic Urban Neighborhoods of Indianapolis, representing the historic districts of Marion County appreciates and is encouraged that INDOT has attempted to improve the North Split design with the preferred Alternative 4c. While it attempts to address the Rethink Coalition's 4 guiding principles, it falls short with principals #1 and #2 as it widens the footprint of the west leg by 24 feet, and does not accommodate principles #3 and #4 with increased connectivity of neighborhoods and areas of commerce divided by the interstates and increased opportunities for inclusive economic development along the path of the interstates.</i></p> <p><i>This is a defining project for the City of Indianapolis for the next 50 years. The Indianapolis community, historic districts and businesses have expressed their interest in exploring the opportunities that this project offers and desires INDOT to truly invest in studying options that would make this project aspirational and forward thinking.</i></p> <p><i>We agree that the integrity and safety of the interstate is paramount, but we must also consider the aspects of human health, quality of life, the benefits of improved connectivity and the opportunity for economic development.</i></p> <p><i>To that end, INDOT specifically indicated that they would welcome a study to be prepared by the Rethink Coalition. With a coalition of businesses, organizations and Indy Chamber, a study was indeed</i></p>	<p><i>See response to a similar comment regarding the four guiding principles on page 2.</i></p> <p><i>See response on page 2 regarding the independent study presented by the Rethink</i></p>

<p><i>enacted upon and self funded. This is truly monumental, with community acting in good faith to help guide this process in a collaborative manner. INDOT now seems reluctant to seriously consider the ARUP Report, by an internationally-acclaimed engineering firm. We find INDOT's stonewalling to be frustrating, bewildering and disrespectful of the communities interests. We looked forward to the ARUP Report to inform this process and find common ground with which to work.</i></p> <p><i>We request that the APE be expanded to include the West St/ MLK interchange. INDOT has indicated that the interchange needs to be addressed. With the added traffic and change of routes, this must be included in the project to make the system efficient.</i></p> <p><i>INDOT should consider the recommendations of the Rethink 65/70 coalition.</i></p> <p><i>Please capture the Rethink Coalition's guiding principles for reconstruction of the North Split in a way that will set the stage for progressive, forward thinking construction of the north, east, and south legs of I-65/70 through downtown Indianapolis, specifically:</i></p> <ol style="list-style-type: none"> <i>1. No above grade walls</i> <i>2. No expansion of the existing number of through lanes</i> <i>3. Increased connectivity of neighborhoods and areas of commerce divided by the interstates</i> <i>4. Increased opportunities for inclusive economic development along the path of the interstates</i> <p><i>INDOT's preferred alternative 4c takes steps toward these goals, but still widens the footprint of the interstate's north leg through portions of a historic neighborhood, further cutting off a densely populated and vibrant area from the downtown core.</i></p> <p><i>INDOT's preferred alternative 4c eliminates some connections between I-65 and I-70 and local streets which will add even more congestion to the remaining exits and entrances to the interstates especially at peak periods.</i></p> <p><i>The reconstruction of the North Split should be largely depressed below grade to allow for the more efficient reconstruction of depressed legs of I-65 on the north leg, I-65/I-70 on the east leg, and I-70 on the south leg of the Inner Loop.</i></p> <p><i>INDOT's preferred alternative design does not address in adequate detail the economic development impact/potential of interstate right-of-way space in designated project areas.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report, which yields acres of new land for massive urban inclusive economic development.</i></p>	<p><i>Coalition and ARUP Corporation in November 2018.</i></p> <p><i>See response to a similar comment regarding the addition of the West Street interchange to the APE on page 11.</i></p> <p><i>See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</i></p> <p><i>See response to a similar comment regarding the four guiding principles on page 2.</i></p> <p><i>See response to similar comment regarding an additional barrier due to a widened footprint on page 15.</i></p> <p><i>See response to similar comment regarding detailed study of traffic changes on page 9.</i></p> <p><i>See response to similar comment regarding the future accommodation of depressed legs outside the interchange on page 21.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p>
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INDOT's segmented approach to reconstruction of the interstate precludes an integrated approach to the project that can fuel real urban progress in a way that sets an inspiring example of urban design and execution.

We would like to see INDOT extend the first phase project boundary to at least include the West Street intersection and north interchange between I-65 and I-70.

1.0 Purpose and Need Statement

The purpose and need statement accurately includes condition, safety and congestion. However, we believe there are gaps in the statement that still require attention.

Comments:

a. The Alternatives Screening Report Purpose and Need statement is for a narrowly defined project area that does not address logical termini adequately (FHWA defines logical termini as rational end points for a project such as a major crossroads or traffic generator). A project may be phased but it must fully consider true logical termini. This is most notable by using the east end of the Alabama Street bridge and Meridian Street ramps as convenient rather than logical termini.

b. Logical termini define the level of potential environmental effects. In this case the West Street interchange should be the logical terminus (as a major traffic generator/major crossroads) and should also be included within the Area of Potential Effect (APE) of Section 106 review for this project. Otherwise the project, as currently proposed, appears to meet FHWA's definition of Project Segmentation.

c. We base these comments on the 2016 Project Intent Report which makes it clear that INDOT saw the interchange as part of a larger project that was being broken up just for funding and construction convenience. Specifically, page 16 of the 2016 Project Intent Report states "Depending on how the 3 separate project units are advanced/funded (altogether or incrementally), it may be acceptable to conduct interchange IAR's in steps of phases. For a variety of reasons, including sheer scale and cost, the 3 sections of this work are most likely to be advanced separately, though design must be coordinated closely.at this time, the order of the 3 sections completion should be (1) the North Split interchange bounded by Vermont Street, Central Avenue, and Commerce Avenue, (2) I-65 near Northside from Central Avenue to Fall Creek, and (3) I-70 near Eastside from Commerce Avenue to I-465 East Leg." Based on this statement from the 2016 Project Intent Report, we believe the project should require an EIS instead of only an EA level of environmental study.

d. Reconstructing a critical segment of the downtown interstate system as proposed in the Alternatives Screening Report perpetuates the disruption and fragmentation that resulted from the original construction. This approach not only misses the opportunity to correct past mistakes but overlooks the larger economic development and

See response to similar comments regarding the Rethink Coalition/Arup proposal on page 2.

See response to similar comment regarding the detailed traffic impact studies being conducted as part of the North Split interchange EA process on page 9.

See response to these comments on pages 11 and 12.

<p><i>connectivity opportunities presented as the larger system is sequentially rebuilt from the ground up.</i></p> <p>2.0 Proposed Performance Measures shown in Table 2-4, page 2-15 Comments:</p> <p><i>a. This table reveals that the preferred Alternative 4C design does not address the fundamental design flaw of the existing system: the commingling of local and through traffic throughout the inner loop. To address this issue, we request that your study examine an additional alternative to resolve this issue. We recommend that local destination traffic be separated from freeway-to-freeway interstate traffic and that a new local arterial distributor system be established at the surface level that connects with the local street grid.</i></p> <p><i>b. Closures of Collector Distributor access points: Alternative 4C proposes elimination of some connections to local streets to resolve some safety and congestion issues. We believe these closures will displace those issues to other locations with unpredicted impacts not addressed in the Alternatives Screening Report. The impacts beyond the project limits should be identified and remedied. For example, the West Street and Fletcher Place entrances/exits are in or adjacent to historic districts and should be considered in the APE.</i></p> <p><i>c. Bridge Condition & Remaining Service Life: the community supports measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10 year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but also removes the visual and physical connectivity divides between existing neighborhoods.</i></p> <p>3.0 Traffic Mobility Comments Comments:</p> <p><i>a. Chapter 2 of the attached ARUP Strategic Advisory states that the proposed connectivity and accessibility changes outlined in the INDOT Alternatives Screening Report will change travel patterns for thousands of vehicles in the downtown area. This alternative pathing would divert some vehicles to travel longer distances on local streets and others to travel longer distances on the Interstate system. In either case, these diversions could add several minutes and vehicle miles traveled to peak period trips as well as create congestion points elsewhere in the local street grid. We believe this issue can be resolved by a better pairing of the interstate and local grid within the existing corridor and would like these alternatives to be fully explored.</i></p> <p>4.0 Economic Development Potential Comments:</p> <p><i>a. The INDOT Proposal is not compatible with the Coalition's principles of promoting and enhancing economic development potential. The Rethink Coalition desires to create new mixed-use development districts from relinquished interstate right-of-way space that could be made available by a reduced interstate footprint.</i></p>	<p><i>See response to these comments on pages 12 and 13.</i></p> <p><i>See response to these comments on page 13.</i></p> <p><i>See response to these comments on pages 13 and 14.</i></p>
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b. *The Rethink 65/70 Coalition requests INDOT redesign the northside leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.*

c. *Chapter 3 of the attached ARUP Strategic Advisory shows that over 38.7 acres of new area can be gained on the northside segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially generating over 1000 residential units and 1.6M square feet of commercial space.*

d. *A primary benefit to INDOT is that a reduced footprint, depressed highway, absent multiple ramps, would be a more efficient and cost-effective project that also generates significant community benefit. This model could be extended across the remaining inner loop segments that are planned to be reconstructed.*

5.0 Connectivity Comments

Comments:

a. *The INDOT Proposal is not compatible with the Coalition's principles of connectivity for all modes. The Rethink Coalition has studied the development of a parallel three-lane low-speed surface collector/distributor system to restore grid connectivity within the existing INDOT corridor.*

See response to these comments on page 14.

b. *This will provide multimodal balance between pedestrian, bicycle, transit and automobile accommodation with local access to new frontage development, including curbside parking and delivery and an urban parkway aesthetic with a street tree canopy continuum and buffer.*

c. *This system will also reduce congestion and delay for commuters currently caused by backups on local streets at exit/entry ramps. By restoring the street grid, commuters will find multiple ways to move toward their destinations and continue their journey and avoid congestion points.*

d. *By shrinking the footprint of the interstate, a continuous transit connector and multimodal path can be accommodated within the relinquished real estate to provide mobility to populations that travel without a car.*

e. *There is growing evidence of the effectiveness of local grid connectivity to reduce congestion in many US cities that have, or are planning to, reconstruct their interstates.*

6.0 Economic/Social Justice Comments

Comments:

a. *The INDOT Proposal is not compatible with the Coalition's goals of equitable transportation and urban growth as it will concentrate additional traffic and congestion at the West Street interchange, exacerbating the current congestion that occurs on the local street grid in the adjacent historically African American neighborhood.*

See response to these comments on page 14.

<p>7.0 Preferred Alternate 4C Comments:</p> <p>a. Access at Meridian/Pennsylvania and Meridian/Delaware Ramps would no longer be available from I-70 westbound traffic proposal: we find it unacceptable that access to Indianapolis' primary street to the downtown core at Monument Circle would no longer be available to thousands of travelers. We believe this will impact commuters, visitors and residents by adding time and vehicle miles traveled to their trips.</p> <p>b. Retaining Walls: The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, all listed on the National Register of Historic Places, in addition to impacting specific national register structures. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</p> <p>c. Added pavement width: the additional pavement width exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods.</p>	<p>See response to these comments on pages 14 and 15.</p>
<p>Gary Chilluffo – 10/30/2018</p>	
<p>We are encouraged that INDOT has made improvements to the design of the North Split in the preferred Alternative 4c but it also sheds light on its shortcomings from a mobility, connectivity, economic/ community development perspective.</p> <p>INDOT must improve this latest concept, minimize impacts due to widening, and commit to high quality design standards for walls, underpasses, lighting, sound mitigation, buffering, landscape treatments, etc. AND to added community amenity (park expansion, trails, connectivity, etc.) made possible by the reduction in size of the interchange, particularly on its north side. The APE should be expanded to include the West St / MLK interchange and address the current and future traffic issues that are sure ensue.</p> <p>INDOT should consider the recommendations of the Rethink 65/70 coalition.</p> <p>Please capture the Rethink Coalition's guiding principles for reconstruction of the North Split in a way that will set the stage for progressive, forward thinking construction of the north, east, and south legs of I-65/70 through downtown Indianapolis, specifically:</p> <ol style="list-style-type: none"> 1. No above grade walls 2. No expansion of the existing number of through lanes 3. Increased connectivity of neighborhoods and areas of commerce divided by the interstates 	<p>Many of the features referred to in this comment will be defined in consultation with the community in the CSS process. See response on page 5 regarding the CSS process.</p> <p>See response to a similar comment regarding the addition of the West Street interchange to the APE on page 11.</p> <p>See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</p> <p>See response to a similar comment regarding the four guiding principles on page 2.</p>

<p><i>4. Increased opportunities for inclusive economic development along the path of the interstates</i></p> <p><i>INDOT's preferred alternative 4c takes steps toward these goals, but still widens the footprint of the interstate's north leg through portions of a historic neighborhood, further cutting off a densely populated and vibrant area from the downtown core.</i></p> <p><i>INDOT's preferred alternative 4c eliminates some connections between I-65 and I-70 and local streets which will add even more congestion to the remaining exits and entrances to the interstates especially at peak periods.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report which calls for depressing the I-65 and I-70 with local destination traffic being separated from freeway-to-freeway traffic to better connect with the local street grid.</i></p> <p><i>The reconstruction of the North Split should be largely depressed below grade to allow for the more efficient reconstruction of depressed legs of I-65 on the north leg, I-65/I-70 on the east leg, and I-70 on the south leg of the Inner Loop.</i></p> <p><i>INDOT's preferred alternative design does not address in adequate detail the economic development impact/potential of interstate right-of-way space in designated project areas.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report, which yields acres of new land for massive urban inclusive economic development.</i></p> <p><i>INDOT's segmented approach to reconstruction of the interstate precludes an integrated approach to the project that can fuel real urban progress in a way that sets an inspiring example of urban design and execution.</i></p> <p><i>We would like to see INDOT extend the first phase project boundary to at least include the West Street intersection and north interchange between I-65 and I-70.</i></p>	<p><i>See response to similar comment regarding an additional barrier due to a widened footprint on page 15.</i></p> <p><i>See response to similar comment regarding detailed study of traffic changes on page 9.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the detailed traffic impact studies being conducted as part of the North Split interchange EA process on page 9.</i></p>
<p>Mass Ave Merchants Association – Meg Storrow – 10/29/2018</p>	
<p><i>The Mass Ave Merchants Association (MAMA) thanks the State of Indiana for encouraging citizens to participate and comment on the North Split. We are serious about collaborating with INDOT on achieving a solution that improves transportation in Indianapolis. Towards that end we respectfully attach a letter with our comments on the INDOT Alternatives Screening Report dated September 21, 2018.</i></p> <p><i>1.0 Proposed Performance Measures shown in Table 5-7, page 5-9</i></p> <p><i>a. INDOT proposes elimination of some connections to local streets to resolve safety and congestion issues. We believe these closures will displace those issues to other locations with unpredicted impacts not addressed in the Alternatives Screening Report. We believe the Area of</i></p>	<p><i>See response to a similar comment regarding traffic impacts and the expansion of the APE on page 11.</i></p>

<p><i>Potential Effects (APE) should be expanded to include the exit/entry areas that may be impacted, such as West Street and Fletcher Ave.</i></p> <p><i>b. Alternative 4C, INDOT's Preferred Alternative, proposes eliminating access at Meridian/Pennsylvania and the Meridian/Delaware ramps from I-70 westbound traffic and the Ohio/Michigan exits via the collector-distributor ramp from I-70. We find it unacceptable that access to the downtown core would no longer be available to thousands of travelers and we believe this will deter our customer base and their patronage of Mass Ave.</i></p> <p><i>c. MAMA supports measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10 year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but that also remove the visual and physical connectivity divides between existing neighborhoods.</i></p> <p><i>Mass Ave was cut at 10th Street and no longer connects to north Mass Ave when the North Split was constructed. The northeast end of Mass Ave subsequently struggled for years to be economically viable. We urge INDOT to consider an inner loop design that reconnects the street grid to provide connectivity and encourage economic development.</i></p> <p>3.0 Retaining Walls: <i>The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, and the Mass Ave Commercial District, all listed on the National Register of Historic Places. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</i></p> <p>4.0 Added pavement width <i>The additional pavement width of up to 24 feet exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods and the Mass Ave District. Many of our workers live in adjacent districts and walk or bike to work.</i></p> <p>2.0 Economic Development Potential <i>a. The INDOT Proposal is does not promote or enhance economic development potential. MAMA agrees with the Rethink 65/70 Coalition that new mixed-use development districts created from relinquished interstate right-of-way space made available by a reduced interstate footprint could be transformative for downtown. As independent</i></p>	<p><i>The Alternative 4c access changes are incorrectly described in the comment. Alternative 4c as described in the Alternatives Screening Report would eliminate access to Meridian/Pennsylvania from westbound I-70 and to the collector-distributor road from southbound I-65. [Note: Subsequent to the Alternatives Screening Report, the preliminary preferred alternative was refined so I-65 southbound connects to the C-D road and the entrance ramp at Delaware Street does not. The Delaware Street ramp will only connect to I-70 eastbound.]</i></p> <p><i>See response to this comment on page 13.</i></p> <p><i>See response to similar comment regarding proposed system-level changes on page 12.</i></p> <p><i>See response to this comment on page 15.</i></p> <p><i>See response to similar comment regarding connectivity on page 15.</i></p> <p><i>See response to these comments on pages 13 and 14.</i></p>
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<p>merchants and restaurant owners, we need continued means to grow our customer base to effectively compete with suburban malls.</p> <p>b. MAMA supports the Rethink 65/70 Coalition request that INDOT redesign the northside leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.</p> <p>c. We understand from a study that the Rethink 65/70 Coalition prepared, that over 38.7 acres of new area can be gained on the northside segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially generating over 1000 residential units and 1.6M square feet of commercial space. This would greatly enhance the viability of MAMA businesses.</p>	
<p>North Square Neighborhood Association – Jordan Ryan – 10/29/2018</p>	
<p>The North Square Neighborhood Association thanks the State of Indiana for encouraging citizens of the region to form a grand but achievable vision of something all Hoosiers can be proud of for the next 50 years.</p> <p>The Capital City needs this major defining infrastructure element to become an inspiring project that can fuel real urban progress that our leaders and our citizens can say is an example for the rest of the country of what is best in urban design and execution. We pledge the financial, political and civic power/collaboration/cooperation of the Coalition to work night and day with INDOT to get to that aspirational place. We are serious about collaborating for a solution that befits the Hoosier State and that becomes a model for other States.</p> <p>*We are disappointed that NSNA's request to have the public commenting period deadline extended until after the release of the Arup engineering study was declined. INDOT is rushing the process and denying the public the ability to make informed decisions with all information available.</p> <p>Towards that end we respectfully provide the following comments on the INDOT Alternatives Screening Report dated September 21, 2018.</p> <p><i>1.0 Purpose and Need Statement</i> The purpose and need statement accurately includes condition, safety and congestion. However, we believe there are gaps in the statement that still require attention to fully address the significance of this project. Comments: a. Logical Termini 1. The Alternatives Screening Report Purpose and Need statement is for a narrowly defined project area that does not address logical termini adequately (FHWA defines logical termini as rational end points for a project such as a major crossroads or traffic generator). A project may be phased but it must fully consider true logical termini. The east end of the Alabama Street bridge and Meridian Street ramps are convenient rather than logical termini.</p>	<p>See response on page 2 regarding the independent study presented by the Rethink Coalition and ARUP Corporation in November 2018.</p> <p>See response to these comments on pages 11 and 12.</p>

2. Logical termini define the level of potential environmental effects. In this case the West Street interchange should be the logical terminus (as a major traffic generator/major crossroads) and should also be included within the Area of Potential Effect (APE) of Section 106 review for this project. Otherwise the project, as currently proposed, still appears to fall under FHWA's definition of Project Segmentation.

3. We base these comments on the 2016 Project Intent Report which makes it clear that INDOT saw the interchange as part of a larger project that was being broken up just for funding and construction convenience. Specifically, page 16 of the 2016 Project Intent Report states:

"Depending on how the 3 separate project units are advanced/funded (altogether or incrementally), it may be acceptable to conduct interchange IAR's [Interstate Access Request's] in steps or phases. For a variety of reasons, including sheer scale and cost, the 3 sections of this work are most likely to be advanced separately, though design must be coordinated closely.at this time, the order of the 3 sections completion should be (1) the North Split interchange bounded by Vermont Street, Central Avenue, and Commerce Avenue, (2) I-65 near Northside from Central Avenue to Fall Creek, and (3) I-70 near Eastside from Commerce Avenue to I-465 East Leg."

4. Based on this statement from the 2016 Project Intent Report, we believe the project should require an EIS instead of only an EA level of environmental study unless this is fully addressed prior to submission to FHWA.

b. Cumulative Impacts

Reconstructing a critical segment of the downtown interstate system as proposed in the Alternatives Screening Report perpetuates the disruption and fragmentation that resulted from the original construction. FHWA has the responsibility to address and consider direct, indirect and cumulative impacts in the NEPA process. INDOT's approach circumvents FHWA's responsibility to address the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. (40 CFR § 1508.7)

c. Financing

The Tolling Implementation Study currently underway should inform Inner Loop rebuild strategies to include logistics infrastructure and the potential revenue resources from tolling that could impact design, project extents and logical termini. The current project is based on available local funds to match federal dollars, which has thus constrained the project from a comprehensive approach.

Comments:

2.0 Proposed Performance Measures shown in Table 5-7, page 5-9

- a. This table reveals that the preferred Alternative 4C design does not address the fundamental design flaw of the existing system: the commingling of local and through traffic throughout the inner loop with significant impacts on logistic traffic. To address

See response to this comment on page 12.

See response to this comment on page 12.

See response to these comments on pages 12 and 13.

this issue, we request that your study examine an additional alternative to resolve this issue: separation of local destination traffic from freeway-to-freeway interstate traffic, with a new local arterial distributor system established at the surface level to connect with the local street grid.

- b. Closures of Collector Distributor access points: Alternative 4C proposes elimination of some connections to local streets to resolve some safety and congestion issues. We believe these closures will displace those issues to other locations with unpredicted impacts not addressed in the Alternatives Screening Report. We believe the Area of Potential Effects (APE) should be expanded to include the exit/entry areas that may be impacted, such as West Street and Fletcher Ave.*
- c. We support measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10-year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but also removes the visual and physical connectivity divides between the existing historic neighborhoods.*

3.0 Traffic Mobility Comments

Comments:

- a. Chapter 2 of the attached ARUP Strategic Advisory states that the proposed connectivity and accessibility changes outlined in the INDOT Alternatives Screening Report will change travel patterns for thousands of vehicles in the downtown area. This alternative pathing would divert*
- b. some vehicles to travel longer distances on local streets and others to travel longer distances on the Interstate system. In either case, these diversions could add several minutes and vehicle miles traveled to peak period trips as well as create congestion points elsewhere in the local street grid.*
- c. We believe this issue can be resolved by a better pairing of the interstate and local grid within the existing corridor and would like these alternatives to be fully explored.*

4.0 Economic Development Potential

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's principles of promoting and enhancing economic development potential. The Rethink Coalition desires to create new mixed-use development districts from relinquished interstate right-of-way space that could be made available by a reduced interstate footprint.*
- b. The Rethink 65/70 Coalition requests INDOT redesign the northside leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.*
- c. Chapter 3 of the attached ARUP Strategic Advisory shows that over 38.7 acres of new area can be gained on the northside segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially*

See response to these comments on page 13.

See response to these comments on pages 13 and 14.

generating over 1000 residential units and 1.6M square feet of commercial space.

- d. A primary benefit to INDOT is that a reduced footprint, depressed highway, absent multiple ramps, would be a more efficient and cost-effective project that also generates significant community benefit. This model could be extended across the remaining inner loop segments that are planned to be reconstructed.

5.0 Connectivity Comments

Comments:

- a. The INDOT Proposal is not compatible with the Coalition's principles of connectivity for all modes. The Rethink Coalition has studied the development of a parallel three-lane low-speed surface collector/distributor system to restore grid connectivity within the existing INDOT corridor.
- b. The Coalition's concept will provide multimodal balance between pedestrian, bicycle, transit and automobile accommodation with local access to new frontage development, including curbside parking and delivery and an urban parkway aesthetic with a street tree canopy continuum and buffer.
- c. The Coalition's concept will also reduce congestion and delay for commuters currently caused by backups on local streets at exit/entry ramps. By restoring the street grid, commuters will find multiple ways to move toward their destinations and continue their journey and avoid congestion points.
- d. By shrinking the footprint of the interstate, a continuous transit connector and multimodal path can be accommodated within the relinquished real estate to provide mobility to populations that travel without a car.
- e. There is growing evidence of the effectiveness of local grid connectivity to reduce congestion in many US cities that have, or are planning to, reconstruct their interstates.

6.0 Economic/Social Justice Comments:

- a. The INDOT Proposal is not compatible with the Coalition's goals of equitable transportation and urban growth as it will concentrate additional traffic and congestion at the West Street interchange, exacerbating the current congestion that occurs on the local street grid in the adjacent historically African American neighborhood.

7.0 Preferred Alternate 4C Comments:

- a. Alternative 4C proposes eliminating access at Meridian/Pennsylvania and Meridian/Delaware Ramps from I-70 westbound traffic and the Ohio/Michigan exits via the collector-distributor ramp from I-70 proposal. We find it unacceptable that access to the downtown core at Monument Circle would no longer be available to thousands of travelers. We believe this will impact commuters, visitors and residents by adding time and vehicle miles traveled to their trips and deter economic development in downtown.

See response to these comments on page 14.

See response to this comment on page 14.

See response to these comments on pages 14 and 15.

<p>b. <i>Retaining Walls: The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, and the Mass Ave Commercial District, all listed on the National Register of Historic Places. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</i></p> <p>c. <i>Added pavement width: the additional pavement width exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods.</i></p>	
<p>Cottage Home Neighborhood Association – Crystal Rehder – 10/29/2018</p>	
<p><i>The Cottage Home Neighborhood Association thanks the State of Indiana for encouraging citizens of the region to form a grand but achievable vision of something all Hoosiers can be proud of for the next 50 years. We respectfully provide the following comments on the INDOT Alternatives Screening Report dated September 21, 2018.</i></p> <p><i>1.0 Purpose and Need Statement</i></p> <p><i>The purpose and need statement accurately includes condition, safety and congestion. However, we believe there are gaps in the statement that still require attention.</i></p> <p><i>Comments:</i></p> <p>a. <i>The Alternatives Screening Report Purpose and Need statement is for a narrowly defined project area that does not address logical termini adequately (FHWA defines logical termini as rational end points for a project such as a major crossroads or traffic generator). A project may be phased but it must fully consider true logical termini. This is most notable by using the east end of the Alabama Street bridge and Meridian Street ramps as convenient rather than logical termini.</i></p> <p>b. <i>Logical termini define the level of potential environmental effects. In this case the West Street interchange should be the logical terminus (as a major traffic generator/major crossroads) and should also be included within the Area of Potential Effect (APE) of Section 106 review for this project. Otherwise the project, as currently proposed, appears to meet FHWA’s definition of Project Segmentation.</i></p> <p>c. <i>We base these comments on the 2016 Project Intent Report which makes it clear that INDOT saw the interchange as part of a larger project that was being broken up just for funding and construction convenience. Specifically, page 16 of the 2016 Project Intent Report states “Depending on how the 3 separate project units are advanced/funded (altogether or incrementally), it may be acceptable to conduct interchange IAR’s in steps of phases. For a variety of reasons, including sheer scale and cost, the 3 sections of this work are most likely to be advanced separately, though design must be coordinated closely. At this time, the order of the 3 sections completion should be (1) the</i></p>	<p><i>See response to these comments on pages 11 and 12.</i></p>

North Split interchange bounded by Vermont Street, Central Avenue, and Commerce Avenue, (2) I-65 near Northside from Central Avenue to Fall Creek, and (3) I-70 near Eastside from Commerce Avenue to I-465 East Leg.” **Based on this statement from the 2016 Project Intent Report, we believe the project should require an EIS instead of only an EA level of environmental study.**

- d. Reconstructing a critical segment of the downtown interstate system as proposed in the Alternatives Screening Report perpetuates the disruption and fragmentation that resulted from the original construction. This approach not only misses the opportunity to correct past mistakes but overlooks the larger economic development and connectivity opportunities presented as the larger system is sequentially rebuilt from the ground up.

2.0 Proposed Performance Measures shown in Table 2-4, page 2-15

Comments:

- a. This table reveals that the preferred Alternative 4C design does not address the fundamental design flaw of the existing system: the commingling of local and through traffic throughout the inner loop. To address this issue, we request that your study examine an additional alternative to resolve this issue. We recommend that local destination traffic be separated from freeway-to-freeway interstate traffic and that anew local arterial distributor system be established at the surface level that connects with the local street grid.
- b. Closures of Collector Distributor access points: Alternative 4C proposes elimination of some connections to local streets to resolve some safety and congestion issues. We believe these closures will displace those issues to other locations with unpredictable impacts not addressed in the Alternatives Screening Report. The impacts beyond the project limits should be identified and remedied. For example, the West Street and Fletcher Place entrances/exits are in or adjacent to historic districts and should be considered in the APE.
- c. Bridge Condition & Remaining Service Life: the community supports measures to stabilize and extend the service life of bridges that pose a safety issue. We request repairs be made to stabilize the bridges for the 5-10 year period needed to fully examine and construct alternatives that not only resolve safety, condition and congestion, but also removes the visual and physical connectivity divides between existing neighborhoods.

3.0 Traffic Mobility Comments

Comments:

- a. a. Chapter 2 of the attached ARUP Strategic Advisory states that the proposed connectivity and accessibility changes outlined in the INDOT Alternatives Screening Report will change travel patterns for thousands of vehicles in the downtown area. This alternative pathing would divert some vehicles to travel longer distances on local streets and others to travel longer distances on the Interstate system. In either case, these diversions could add several minutes and vehicle miles traveled to peak period

See response to these comments on pages 12 and 13.

See response to these comments on page 13.

trips as well as create congestion points elsewhere in the local street grid. We believe this issue can be resolved by a better pairing of the interstate and local grid within the existing corridor and would like these alternatives to be fully explored.

4.0 Economic Development Potential

Comments:

- a. *The INDOT Proposal is not compatible with the Coalition's principles of promoting and enhancing economic development potential. The Rethink Coalition desires to create new mixed-use development districts from relinquished interstate right-of-way space that could be made available by a reduced interstate footprint.*
- b. *The Rethink 65/70 Coalition requests INDOT redesign the north side leg as a depressed Interstate between College Avenue and West Street and relinquish excess right of way to create a land value capture area for economic development.*
- c. *Chapter 3 of the attached ARUP Strategic Advisory shows that over 38.7 acres of new area can be gained on the north side segment by a reduced interstate footprint. This translates to a value of 2.8M square feet in new development, potentially generating over 1000 residential units and 1.6M square feet of commercial space.*
- d. *A primary benefit to INDOT is that a reduced footprint, depressed highway, absent multiple ramps, would be a more efficient and cost-effective project that also generates significant community benefit. This model could be extended across the remaining inner loop segments that are planned to be reconstructed.*

See response to these comments on pages 13 and 14.

5.0 Connectivity Comments

Comments:

- a. *The INDOT Proposal is not compatible with the Coalition's principles of connectivity for all modes. The Rethink Coalition has studied the development of a parallel three lane low-speed surface collector/distributor system to restore grid connectivity within the existing INDOT corridor.*
- b. *This will provide multimodal balance between pedestrian, bicycle, transit and automobile accommodation with local access to new frontage development, including curbside parking and delivery and an urban parkway aesthetic with a street tree canopy continuum and buffer.*
- c. *This system will also reduce congestion and delay for commuters currently caused by backups on local streets at exit/entry ramps. By restoring the street grid, commuters will find multiple ways to move toward their destinations and continue their journey and avoid congestion points.*
- d. *By shrinking the footprint of the interstate, a continuous transit connector and multimodal path can be accommodated within the relinquished real estate to provide mobility to populations that travel without a car.*

See response to these comments on page 14.

<p>e. <i>There is growing evidence of the effectiveness of local grid connectivity to reduce congestion in many US cities that have, or are planning to, reconstruct their interstates.</i></p> <p>6.0 Economic/Social Justice Comments Comments:</p> <p>a. <i>The INDOT Proposal is not compatible with the Coalition's goals of equitable transportation and urban growth as it will concentrate additional traffic and congestion at the West Street interchange, exacerbating the current congestion that occurs on the local street grid in the adjacent historically African American neighborhood.</i></p> <p>7.0 Preferred Alternate 4C Comments:</p> <p>a. <i>Access at Meridian/ Pennsylvania and Meridian/ Delaware Ramps would no longer be available from I-70 westbound traffic proposal: we find it unacceptable that access to Indianapolis' primary street to the downtown core at Monument Circle would no longer be available to thousands of travelers. We believe this will impact commuters, visitors and residents by adding time and vehicle miles traveled to their trips.</i></p> <p>b. <i>Retaining Walls: The proposed retaining walls of up to 11 feet tall add additional visual and physical barriers between the Old Northside neighborhood on the north side and Chatham Arch and St. Joseph neighborhoods on the south side, all listed on the National Register of Historic Places, in addition to impacting specific national register structures. This additional separation is unacceptable and misses the opportunity to correct past mistakes.</i></p> <p>c. <i>Added pavement width: the additional pavement width exacerbates the separation between the historic districts and misses the opportunity to correct past mistakes. The additional pavement width creates longer bridge spans impacting the comfort and safety of pedestrians and bicyclists traveling between the neighborhoods.</i></p>	<p><i>See response to this comment on page 14.</i></p> <p><i>See response to these comments on pages 14 and 15.</i></p>
<p>Cottage Home Neighborhood Association – Crystal Rehder – 10/29/2018</p>	
<p><i>Cottage Home Neighborhood Association supports a progressive, forward thinking construction of the north, east, and south legs of I-65/70 through downtown Indianapolis, specifically:</i></p> <ol style="list-style-type: none"> <i>1. No above grade walls</i> <i>2. No expansion of the existing number of through lanes</i> <i>3. Increased connectivity of neighborhoods and areas of commerce divided by the interstates</i> <i>4. Increased opportunities for inclusive economic development along the path of the interstates</i> <p><i>INDOT's preferred alternative 4c takes steps toward these goals, but still widens the footprint of the interstate's north leg through portions of a historic neighborhood, further cutting off a densely populated and vibrant area from the downtown core.</i></p>	<p><i>See response to a similar comment regarding the four guiding principles on page 2.</i></p> <p><i>See response to similar comment regarding an additional barrier due to a widened footprint on page 15.</i></p>

<p><i>INDOT's preferred alternative 4c eliminates some connections between I-65 and I-70 and local streets which will add even more congestion to the remaining exits and entrances to the interstates especially at peak periods.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report which calls for depressing the I-65 and I-70 with local destination traffic being separated from freeway-to-freeway traffic to better connect with the local street grid.</i></p> <p><i>The reconstruction of the North Split should be largely depressed below grade to allow for the more efficient reconstruction of depressed legs of I-65 on the north leg, I-65/I-70 on the east leg, and I-70 on the south leg of the Inner Loop.</i></p> <p><i>INDOT's preferred alternative design does not address in adequate detail the economic development impact/potential of interstate right-of-way space in designated project areas.</i></p> <p><i>We encourage INDOT to adopt the design presented in the joint Rethink Coalition/Arup Report, which yields acres of new land for massive urban inclusive economic development.</i></p> <p><i>INDOT's segmented approach to reconstruction of the interstate precludes an integrated approach to the project that can fuel real urban progress in a way that sets an inspiring example of urban design and execution.</i></p>	<p><i>See response to similar comment regarding detailed study of traffic changes on page 9.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the future accommodation of depressed legs outside the interchange on page 21.</i></p> <p><i>See response to similar comment 4.0 regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See response to similar comment regarding the Rethink Coalition/Arup proposal on page 2.</i></p> <p><i>See responses to similar comments regarding the Rethink Coalition/Arup proposal on page 2.</i></p>
<p>Chatham-Arch Neighborhood Association (CANA) – David Pflugh – 10/29/2018</p>	
<p><i>I represent the Chatham Arch Neighborhood Association (CANA). CANA members are residents, business owners and interested persons in the larger Chatham Arch-Massachusetts Avenue District (CANA). CANA is located immediately south of Interstate 65 (I-65) and west of the combined I-65/I-70 Collector/Distributor on the east side of Indianapolis. Chatham Arch was listed on the National Register of Historic Places in 1980 and CANA was listed in 1982. Because of Chatham Arch's location, the members of CANA are particularly concerned about INDOT's plans for reconstruction of the North Split Interchange. We have been intently following the evolution of INDOT's plans for the project, and I would like to register some comments and concerns regarding INDOT's latest Preferred Alternative on behalf of CANA. The PA addresses safety concerns while keeping costs low and minimizing the addition of the retaining walls. However, the PA fails to adequately account for stated desire of the downtown neighborhoods for increased connectivity. Instead, the PA preserved the discontinuity between our neighborhoods resulting from the original construction of the interstates fifty years ago. The discontinuity is not something that can be remediated through additional work on the current design.</i></p> <p><i>INDOT has presented studies to the Consulting Parties showing the majority of vehicle traffic on the downtown interstates originated or terminates within the approximate mile square city center. This data</i></p>	<p><i>The data on through traffic on the interstate system was presented in a prior study (System-Level Analysis of Downtown Interstates). The data was for traffic passing through the area from</i></p>

<p><i>appears to have been overlooked in the creation of the new PA design, which instead seems to encourage, even promote, through traffic.</i></p> <p><i>I propose INDOT conduct further studies on expressways which transition to at-grade boulevards or a collector/distributor route through the downtown area. If possible, express routes could be built beneath the CD, but as the closure of a section of I-65 in July demonstrated, express routes through the city are merely a convenience, not a necessity for workers and visitors to access downtown businesses. An at-grade route would satisfy all the stated objectives of the state and many local residents: slowing or re-routing traffic to increase safety, removing barriers between neighborhoods, and promoting dissemination of economic opportunities to a wider section of the city, all while keeping construction and maintenance costs at a minimum.</i></p> <p><i>In summary, CANA supports in principle the objectives of the Rethink I-65/I-70 Coalition. To that end, CANA formally requests an Economic Impact Study (EIS) for the North Split Reconstruction project. CANA feels an Environmental Assessment (EA) only is not sufficient to determine the effect of the project on our nationally-recognized historic neighborhood. CANA appreciates the partnership demonstrated by INDOT to date, and we hope to continue working together to further the vision of a successful and vibrant downtown Indianapolis.</i></p>	<p><i>outside I-465 to outside I-465 to determine whether diverting regional through traffic to I-465 could reduce demand on downtown interstates.</i></p> <p><i>Although some increase in through traffic might be expected due to operational improvements in the North Split interchange, traffic modeling used to evaluate alternatives did not show a large increase with implementation of Alternative 4c compared to the no-build condition.</i></p> <p><i>See response on page 12 regarding the review of inner loop options in the previously prepared System-Level Analysis of Downtown Interstates</i></p> <p><i>The determination of the type of study (class of action) to be conducted was made in consultation with FHWA. The purpose of an EA is to determine if an EIS is necessary or if there will not be significant impacts resulting from the project. Effects to historic properties will be determined as part of the Section 106 consultation process with consulting parties.</i></p>
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