



September 24, 2020

Mr. Ron Bales  
Manager, Environmental Policy Office  
Indiana Department of Transportation  
Environmental Services Division  
100 North Senate Avenue, Room IGCN N642  
Indianapolis, IN 46204

Re: Review of Finding of No Significant Impact (FONSI) Request Packet  
Des. Nos. 1592385 and 1600808 (Lead)  
I-65/I-70 North Split Interchange Project  
Indianapolis, Indiana

Dear Mr. Bales:

Pursuant to 40 CFR, Part 1500.4(q) and paragraph 5 of the Department of Transportation (DOT) Order 5610.1C implementing the National Environmental Policy Act (NEPA) of 1969, HNTB Corporation is requesting review of the enclosed Finding of No Significant Impact (FONSI) request packet for the above-referenced project. This information packet includes the following:

- Attachment A: Approved Environmental Assessment (Text Only)
- Attachment B: Public Involvement Documentation
- Attachment C: Section 106 Documentation
- Attachment D: Project Commitments
- Attachment E: Additional Information for Noise Barrier 3W (NB3W)

### **Public Involvement**

The approved Environmental Assessment (EA) was released for public involvement by the Federal Highway Administration (FHWA) on July 17, 2020. The public comment period was from July 17, 2020 to August 17, 2020.

Several public involvement activities for the project took place during the public comment period including a virtual Community Advisory Committee (CAC) meeting; a virtual Environmental Justice (EJ) Working Group meeting; a virtual public information meeting; social media posts, email blasts, and text messages notifying the public of the public involvement opportunities; the launch of a virtual project office; and, a formal public hearing.

A virtual CAC meeting was held on July 27, 2020 from 1-3 p.m. using the WebEx videoconferencing tool. Twenty (20) CAC members participated in the meeting. The meeting provided CAC members an opportunity to learn about upcoming public involvement activities and preview the presentation for the public hearing. CAC member questions pertained to the Commerce/Roosevelt Avenue bridge, protecting neighborhoods from dust during construction, prevention of damage to local roads, ensuring minority-owned contractor participation in construction, and reporting of contractor infractions during construction. A meeting agenda and meeting minutes are included in Attachments B31-B43.

A virtual EJ Working Group meeting was held on July 28, 2020 from 1-3 p.m. using the WebEx videoconferencing tool. Six (6) EJ Working Group members participated in the meeting. The meeting provided EJ Working Group members an opportunity to learn about upcoming public involvement activities and preview the presentation for the public hearing. EJ Working Group member questions pertained to the



Commerce/Roosevelt Avenue bridge, coordination with the Indianapolis Department of Public Works regarding installation of traffic signals, and the timeline for the employer education campaign from the Mobility Management Plan. A meeting agenda and meeting minutes are included in Attachments B50-B61.

A virtual public information meeting was held on July 30, 2020 from 5-7 p.m. using the WebEx videoconferencing tool. Approximately fifty-seven (57) members of the public participated in the meeting. The meeting provided members of the public an opportunity to see the presentation for the public hearing. Questions from the public generally pertained to the timeframe for submitting comments on the EA, the height of retaining walls, interstate access changes, Do Not Disturb areas, traffic congestion, crash estimates, maintenance of traffic during construction, changes in the NEPA process, adverse effects to historic properties, traffic signal improvements, repairs to local roads after construction, coordination with the I-69 project south on I-465, closure of the Monon Trail, landscaping and aesthetics, Commerce/Roosevelt Avenue bridge, trash and debris removal, and the impacts of Covid-19 on construction.

INDOT launched a virtual project office for the North Split project on August 11, 2020. The virtual project office provides an opportunity for the public to view and interact with the latest information about the North Split project without traveling to a physical office location. This virtual project office has been configured with the display boards and other materials that were available during the public comment period for the EA and will continue to be updated throughout project construction. The virtual project office is available on the project website: <https://northsplit.com/virtual-project-office/>.

A public hearing was held on August 3, 2020. There were approximately 20 attendees at the public hearing. Fourteen (14) people signed in at the public hearing and approximately five attended but did not sign in at the registration table. Three attendees provided verbal comments following the presentation. A total of 47 comment letters, forms, emails, verbal comments at the hearing, website form comments, or messages to a toll-free hotline were received during the comment period. Four comment letters/emails were from resource agencies including the U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), Indiana Department of Natural Resources (IDNR), and Indiana Department of Environmental Management (IDEM) Groundwater Section. Some comments included multiple topics. Comments focused on the following topics:

- I-70 bridge over Commerce Avenue/Roosevelt Avenue (9 comments)
- Other alternatives (8 comments)
- Delaware Street entrance ramp/Pennsylvania Street exit ramp access changes (7 comments)
- Section 106 consultation process/commitments (4 comments)
- Environmental justice (3 comments)
- Additional trails/trail enhancements (3 comments)
- Noise (3 comments)
- Miscellaneous comments/questions (3 comments)
- Urban trees/wildlife habitat (2 comments)
- I-65 bridge over Alabama Street bridge (2 comments)
- Threatened and endangered species (2 comments)
- Storm water (2 comments)
- Traffic impacts during construction (2 comments)
- Aesthetic Design Guidelines (2 comments)
- Sediment and erosion control (1 comment)
- Ground water (1 comment)
- Permits (1 comment)
- Lighting (1 comment)
- Construction haul routes (1 comment)



- Homeless encampments (1 comment)
- Project schedule (1 comment)
- I-65/I-70 bridges over 10<sup>th</sup> Street (Payne Connection) (1 comment)
- INDOT lift station (1 comment)
- I-70 bridge over Lewis Street (1 comment)
- Truck traffic on downtown interstates (1 comment)
- Maintenance after construction (1 comment)
- Incentives for faster construction (1 comment)
- West Street interchange (1 comment)
- DBE participation in construction contract (1 comment)
- “Big weave” between South and North Split interchanges (1 comment)
- Public art (1 comment)

Comments and responses to comments are contained in Attachment B.

The Indiana Department of Transportation (INDOT) provided the certification of public involvement on August 27, 2020 (Attachment A1).

### **Section 106 Consultation**

FHWA issued an *Adverse Effect* finding for the project on December 19, 2019. The State Historic Preservation Officer (SHPO) concurred with the *Adverse Effect* finding in a letter dated January 17, 2020. The final Section 106 Memorandum of Agreement (MOA) was sent for signatures on May 18, 2020 and was executed on May 29, 2020. Consulting parties were given until June 30 to sign the MOA as concurring parties. One consulting party signed the MOA as a concurring party. One consulting party and one organization sent letters indicating why they did not sign the MOA. Attachment C contains the Section 106 Finding, SHPO concurrence letter, final signed MOA, and letters from consulting parties.

### **Project Modifications**

Since the July 17, 2020 release of the EA for public involvement, modifications have been made to the project. The details of these modifications are discussed below. Unless specifically discussed below, the information and impacts as identified in the EA remain the same.

#### **Noise Barrier 3W (NB3W) Revision:**

The EA and Final Traffic Noise Technical Report show Noise Barrier 3W (NB3W) constructed on the I-70 bridge over Lewis Street and the Monon Trail and stopping at the west end of that bridge. A public comment from the company developing the property adjacent to the west end of NB3W requested the noise barrier stop at Lewis Street rather than continue to the Monon Trail. Table E1 in Attachment E shows the modeled noise results if NB3W stops just east of the I-70 bridge over Lewis Street and the Monon Trail. NB3W would still meet the feasible and reasonable criteria from INDOT’s Traffic Noise Analysis Procedure if NB3W stops east of the I-70 bridge over Lewis Street and the Monon Trail. Predicted noise results with NB3W on and off the bridge structure are highlighted in yellow in Table E1. Predicted noise changes range from no change to -3.0 dB(A). The results from Table E1 were shared with the commenter and their preference was NB3W stop east of the I-70 bridge over Lewis Street and the Monon Trail (Attachments B119-B122).

As part of the North Split Project, NB3W will now stop just east of the I-70 bridge over Lewis Street and the Monon Trail. Maps showing the original and revised locations of NB3W are included in Attachment E.

#### **Maintenance of Traffic (MOT) Through Traffic Detour:**

According to the EA, through traffic on I-65 and I-70 heading into Indianapolis will be directed and detoured around I-465 during North Split construction. I-465 will remain the official detour for I-70 North Split through



traffic; however, the official detour for I-65 North Split through traffic will now be a combination of I-70 and I-465. See the graphics below for clarification.



**EA Official Detour Routes**



**Revised Official Detour Routes**

The reason for the detour change stems from INDOT’s observation of traffic operations on the south leg of I-465 during the recent I-70 Concrete Pavement Restoration project (INDOT Contract R-40511) between the Indianapolis International Airport (Airport) and the South Split, where I-65 and I-70 join in downtown Indianapolis. I-70 was closed in June and July of 2020 with an eastbound closure first, followed by a westbound closure.

With COVID-19’s impact on traffic volumes and patterns, it is a difficult time to assess traffic operations; however, daily traffic volumes recently began to increase, and indications are that by the end of July 2020, daily traffic volumes were within approximately 10% of normal. Recurring congestion was already occurring in some areas along the south leg of I-465 prior to COVID-19, based on observations during the westbound I-70 closure from the Airport to the South Split. INDOT is concerned that the I-465 detour corridor, as identified in the EA, would experience impacts even greater than modeled during project development.

By changing the official detour for I-65 North Split through traffic to I-70 instead of I-465, INDOT is attempting to minimize the increase in traffic on I-465 during the construction of the North Split Project. It is anticipated that I-70, from I-465 to the South Split, will be underutilized during construction of the North Split due to the closure of I-70 through traffic; therefore, capacity will be available for the detoured I-65 through traffic. INDOT realizes that a significant portion of motorists will use “traffic apps” to navigate during construction; however, signing this official detour will help promote its use, especially for truck traffic. Hazardous cargo truck traffic will continue to utilize I-465 as the official detour.



### **Environmental Commitments**

There are 60 commitments listed as *Firm* and nine commitments listed as *For Further Consideration* in the EA (Attachment D). No additional commitments have been incorporated since the EA was released for public comment.

Upon the satisfactory completion of your review of the FONSI request information packet, we would request that you forward the attached information to the FHWA with the request that they prepare the necessary FONSI for this project in order to complete the NEPA process. Please contact me at (317) 695-0825 or [kgillette@hntb.com](mailto:kgillette@hntb.com) if there are any questions or if additional information is needed.

Sincerely,  
HNTB CORPORATION

A handwritten signature in blue ink that reads "Kia M. Gillette".

Kia M. Gillette  
Environmental Project Manager

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FONSI REQUEST

ATTACHMENT A: APPROVED ENVIRONMENTAL  
ASSESSMENT (TEXT ONLY)

# Indiana Department of Transportation

County Marion County Route I-65/I-70 North Split Des. No. 1592385, 1600808 et al.

## FHWA-Indiana Environmental Document CATEGORICAL EXCLUSION / ENVIRONMENTAL ASSESSMENT FORM GENERAL PROJECT INFORMATION

<b>Road No./County:</b>	I-65/I-70 North Split Interchange/Marion County
<b>Designation Number:</b>	1592385, 1600808 et al. (Additional Des. Nos. are listed in Appendix A, page 1)
<b>Project Description/Termini:</b>	I-65/I-70 North Split Interchange Reconstruction Project (North Split Project)/ From the I-70 Valley Avenue Bridge to the east, the I-65/I-70 and Washington Street Interchange to the south (approximately 370 feet south of Washington Street), and the I-65 Alabama Street Bridge (to Illinois Street along 11 <sup>th</sup> and 12 <sup>th</sup> Streets) to the west

After completing this form, I conclude that this project qualifies for the following type of Categorical Exclusion (FHWA must review/approve if Level 4 CE):

<input type="checkbox"/>	<b>Categorical Exclusion, Level 2</b> – The proposed action meets the criteria for Categorical Exclusion Manual Level 2 - table 1, CE Level Thresholds. Required Signatories: ESM (Environmental Scoping Manager)
<input type="checkbox"/>	<b>Categorical Exclusion, Level 3</b> – The proposed action meets the criteria for Categorical Exclusion Manual Level 3 - table 1, CE Level Thresholds. Required Signatories: ESM, ES (Environmental Services Division)
<input type="checkbox"/>	<b>Categorical Exclusion, Level 4</b> – The proposed action meets the criteria for Categorical Exclusion Manual Level 4 - table 1, CE Level Thresholds. Required Signatories: ESM, ES, FHWA
<input checked="" type="checkbox"/>	<b>Environmental Assessment (EA)</b> – EAs require a separate FONSI. Additional research and documentation is necessary to determine the effects on the environment. Required Signatories: ES, FHWA

Note: For documents prepared by or for Environmental Services Division, it is not necessary for the ESM of the district in which the project is located to release for public involvement or sign for approval.

**Release for Public Involvement**

Ronald E. Baker      7-13-2020  
 ESD Signature      Date

**MICHELLE B ALLEN**      Digitally signed by MICHELLE B ALLEN  
 Date: 2020.07.14 13:44:11 -04'00'  
 FHWA Signature      Date

**Certification of Public Involvement**      Kevin S. Jamieson      8-27-2020  
 Office of Public Involvement      Date

INDOT ES/District Env. Reviewer Signature:      Brandon Miller      Digitally signed by Brandon Miller  
 Date: 2020.07.13 07:39:01 -04'00'      Date: 7/13/2020

Name and Organization of CE/EA Preparer:      Kia Gillette/HNTB

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Part I - PUBLIC INVOLVEMENT

Every Federal action requires some level of public involvement, providing for early and continuous opportunities throughout the project development process. The level of public involvement should be commensurate with the proposed action.

Does the project have a historic bridge processed under the Historic Bridges PA\*? Yes No
If No, then: Opportunity for a Public Hearing Required? X

\*A public hearing is required for all historic bridges processed under the Historic Bridges Programmatic Agreement between INDOT, FHWA, SHPO, and the ACHP.

Discuss what public involvement activities (legal notices, letters to affected property owners and residents (i.e. notice of entry), meetings, special purpose meetings, newspaper articles, etc.) have occurred for this project.

Remarks: The I-65/I-70 North Split Interchange Project (North Split Project) has included several public involvement efforts. These efforts include Notice of Entry letters, a project website and email address, social media accounts, public open houses, a Community Advisory Committee (CAC), an Environmental Justice (EJ) Working Group, a public survey, neighborhood meetings, targeted stakeholder meetings, Section 106 consulting party meetings and public notice, two rounds of Context Sensitive Solutions (CSS) neighborhood meetings, and highway noise barrier meetings. Upon release of the Environmental Assessment (EA) for public involvement, a public hearing will be held as described below. Public involvement activities to date are summarized below and included in a table in Appendix G, pages 1-7.
Notice of Entry Letters
Notice of Entry letters were mailed to potentially affected property owners near the project area on June 26, 2017 notifying them about the project and that individuals responsible for land surveying and field activities may be seen in the area (Appendix G, page 8).
Project Website/Email Address
The website for the North Split Project is www.northsplit.com. The website includes project updates, meeting minutes, frequently asked questions, and project documents. Interested parties can also send questions to the project email address (info@northsplit.com) and a project team member provides a response.
Social Media Accounts
The North Split Project has social media accounts on Facebook (www.facebook.com/NorthSplit/) and Twitter (twitter.com/northsplit). These accounts are regularly updated with project information, especially related to notification of public involvement opportunities and meeting information. Accounts are also monitored for questions and comments. Finally, both accounts follow community and CAC member organizations in order foster partnership and communication.
Public Open Houses
Five public open houses were held at key milestones of the North Split project development process. These meetings were broadly advertised to provide an opportunity for all interested parties to participate in the process. The meetings are described below:
• Public Open House #1 (May 23, 2018) – Two formal presentations provided a summary of the System-Level Analysis. Project team members staffed information boards and were available for informal questions before and after the presentations. Approximately 260 people attended Public Open House #1. Comments generally pertained to other alternative concepts for the downtown interstate system, interstate widening and tall retaining walls, requests to engage local agencies and neighborhoods in the project development process, aesthetic improvements to the interstate, safety, accuracy of the traffic modeling, and environmental impacts such as pollution and noise. Comments provided by the public influenced the Indiana Department of Transportation’s (INDOT’s) decision to proceed with reconstruction of the interchange while maintaining options for the remainder of downtown interstates (Appendix G, pages 134-140).

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- Public Open House #2 (October 10, 2018) – The Alternatives Screening Report was presented using a series of information boards and a formal presentation. Approximately 58 people attended Public Open House #2. Comments generally pertained to impacts to historic properties, considering other concepts such as a depressed interstate, improving underpasses for pedestrians, loss of interstate access, connectivity between neighborhoods and downtown, economic development, noise, and impacts of not adding more travel lanes. Comments from the public influenced the selection of a preliminary preferred alternative for the interchange (Appendix G, pages 141-146).
- Public Open House #3/CSS Workshop (August 15, 2019) – Display boards and a formal presentation were used to describe the refined preliminary preferred alternative and CSS process. Approximately nine people attended Public Open House #3. Comments generally pertained to connectivity between neighborhoods, more substantial architecture on bridges, the cost and long-term maintenance of CSS elements, road closures and increased traffic during construction, excess land at the interchange, and the loss of vehicular traffic access at the Vermont Street underpass [note, the project was changed based on public input and Vermont Street will continue to be open to vehicular traffic]. Comments at this meeting were combined with those from neighborhood workshops to define concepts for aesthetic treatments and ideas for improving connectivity (Appendix G, pages 153-165).
- Public Open Houses #4 and #5 (April 28, 2020 and April 30, 2020) – These two public open houses were held virtually via the WebEx conferencing tool. Both open houses provided the same presentation and allowed participants to ask questions via the WebEx chat feature or via the project email address. The presentation included information on public involvement, public survey, noise barrier recommendations, Section 106, traffic impacts during construction, next steps, and the Aesthetic Design Guidelines. Approximately 150 people attended Public Open House #4 and 53 people attended Public Open House #5. Comments generally pertained to traffic impacts during construction and the Aesthetic Design Guidelines (Appendix G, pages 166-177). The presentation and display exhibits were available on the project website for public comment from April 28, 2020 through May 15, 2020. Public comments and responses to public comments on this information are available at [www.northsplit.com](http://www.northsplit.com).

### **CAC Meetings**

The North Split CAC was formed to serve as a sounding board for study information and decision-making, to facilitate collaborative problem solving and discussion of specific issues, and to serve as a link to the community by sharing project information. The 77 members of the CAC represent government, utilities, employers, event/tourism/retail, business, user groups, and special interest groups (Appendix G, pages 9-13). To date, six meetings/briefings have been held in which the CAC provided meaningful input related to public involvement efforts (including EJ outreach activities), system-level concepts, interchange alternatives, opportunities to incorporate CSS into the project, noise barrier recommendations, and traffic impacts during construction (Appendix G, pages 14-133).

### **EJ Working Group Meetings**

The EJ Working Group was formed to focus on EJ community concerns by identifying EJ communities, determining the best outreach methods to reach those communities, and identifying possible impacts. EJ Working Group members include government representatives, low-income advocates, minority organizations, and community representatives (Appendix K, pages 51-54).

To date, four EJ Working Group meetings have been held, as described below:

- Meeting #1 (May 10, 2018) – Topics included a project overview, the role of the EJ Working Group, an overview of the System-Level Analysis, and an overview of EJ and the National Environmental Policy Act (NEPA). A breakout session was held to discuss potential additions to the EJ Working Group and how to reach EJ populations (Appendix K, pages 55-61).
- Meeting #2 (October 18, 2018) – Topics included a review of EJ and NEPA requirements, a public involvement summary, a review of the targeted EJ outreach plan, and presentation of the Alternatives Screening Report (Appendix K, pages 62-69).
- Meeting #3 (July 9, 2019) – Topics included a project update, presentation of the refined preliminary

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preferred alternative, discussion of CSS, and planning for the public survey. A group exercise was conducted on how to promote the public survey (Appendix K, pages 70-80).

- Meeting #4 (April 23, 2020) – This meeting was held virtually via the WebEx conferencing tool. Topics included public involvement, public survey, noise barrier recommendations, Section 106, traffic impacts during construction, next steps, and the Aesthetic Design Guidelines (Appendix K, pages 81-93).

### **Public Survey**

To better engage affected communities, particularly those in areas with elevated concentrations of low-income or minority populations, the North Split project team developed a public survey and launched an outreach campaign to distribute the survey throughout the EJ analysis area. The public survey could be completed online, via a printed copy, or by phone (Appendix K, pages 103-106). Over 1600 people completed the public survey. Information regarding survey results is included in the EJ Technical Memorandum (Appendix K, pages 20 and 107-224).

### **Neighborhood Meetings**

Affected neighborhood groups were identified early in the project to support outreach efforts. Representatives of these neighborhoods participated on all project committees, including the CAC and EJ Working Group. To date, presentations have been made at 29 neighborhood association meetings, town hall meetings, and CSS workshops (Appendix G, pages 1-7).

Neighborhood groups provided comments on the System-Level Analysis, the Alternatives Screening Report, CSS ideas, and noise barriers. This input was a key factor in the development of the preferred alternative.

### **Targeted Stakeholder Meetings**

A wide range of stakeholders have provided input during the North Split Project development process. These stakeholders include government agencies, transportation providers, emergency responders, major employers, event managers, clergy, chambers of commerce, elected officials, and many others. Many of these stakeholders are included on the project CAC, EJ Working Group, or are Section 106 consulting parties. Project-specific information has been presented at 45 individual stakeholder meetings to date (Appendix G, pages 1-7).

Stakeholder input has shaped the development of alternatives and the CSS process. These stakeholders will continue in their role during project implementation to assist with minimizing community impacts, maintaining regional mobility, and communicating with their constituents.

### **Section 106**

Section 106 and 36 CFR 800 outline a process that requires the Federal Highway Administration (FHWA) and INDOT to evaluate the effects of undertakings on properties that are listed on or eligible for listing on the National Register of Historic Places (NRHP). Consulting parties are invited to participate in the Section 106 process. A consulting party is an individual or organization with a demonstrated legal, economic, or historic preservation interest in an undertaking. There are currently 48 consulting parties for the North Split Project (Appendix D, page 29-31). To date, eight Section 106 consulting party meetings have been held at various steps during the Section 106 process (Appendix D, pages 230-253, 435-450, and 653-851).

To meet the public involvement requirements of Section 106, a legal notice of FHWA's finding of Adverse Effect was published in the *Indianapolis Star* on December 24, 2019 offering the public an opportunity to submit comment pursuant to 36 CFR 800.2(d), 800.3(e), and 800.6(a)(4) (Appendix D, pages 451-452). The public comment period closed 30 days later on January 24, 2020. One public comment letter from the Rethink 65/70 Coalition was received (Appendix D, pages 414-429). Responses to the comments in this letter and other consulting party comments regarding the Adverse Effect finding and preliminary Section 106 mitigation ideas are in Appendix D, pages 266-299.

### **Section 4(f)**

The public will be afforded an opportunity to review and comment on the effects of the project regarding impacts to the Monon Trail via a legal advertisement that will be placed in a local publication notifying the public of the EA's availability for review, comment and the date and venue of the public hearing, and the Section 4(f) de minimis finding.

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### **CSS Meetings**

As part of the North Split Project, INDOT has implemented a CSS design process to help integrate the project into the surrounding communities. INDOT developed preliminary design treatments for certain components of the project and has solicited feedback from project stakeholders, including affected residents. A summary of the CSS process is included in Appendix G, pages 178-213.

Two series of neighborhood workshops were conducted in support of the CSS process (Appendix G, pages 147-165). Although the workshops were open to all, they focused on specific neighborhoods adjacent to the project to provide the opportunity for input on local issues and preferences. Neighborhood associations assisted by notifying members directly and providing group responses in addition to those provided by individuals. These comments and the feedback provided during the workshops aided in the development of details related to the appearance of the project and how it can be integrated into surrounding neighborhoods.

As a result of the CSS process, INDOT developed the North Split Aesthetic Design Guidelines which are available in Appendix G, pages 214-326. The Aesthetic Design Guidelines include treatments for the interstate infrastructure (such as underpass treatments, sidewalks, public art space, retaining walls, abutment walls, bridge columns, lighting, signage, fencing) as well as landscaping within the existing right-of-way. Also, as a result of the CSS process, INDOT will keep portions of the Monon Trail detour as a permanent feature after construction. The Aesthetic Design Guidelines were presented to the public at Public Open Houses #4 and #5.

### **Highway Noise Barrier Meetings**

Four highway noise barrier meetings were held for the North Split Project in locations adjacent to the project area where noise barriers were being considered. The purpose of the highway noise barrier meetings was to educate neighborhood residents on INDOT's Traffic Noise Analysis Procedure, to inform the neighborhoods in regards to the impacts and overall treatment plans that are noise related, and to encourage benefited receptors to complete a survey to provide input on whether they wanted the proposed noise barrier constructed at that location (Appendix I, pages 104-116).

### **Public Hearing**

The proposed project is being processed as an EA. Per the current *Indiana Department of Transportation (INDOT) Public Involvement Manual*, a public hearing will be conducted. Upon release of the EA for public involvement, a legal advertisement will be placed in a local publication notifying the public of the EA's availability for review and comment for a period of 30 days. The legal notice will appear in local publications of general circulation, contingent upon the release of this document for public involvement, announcing the availability of the environmental documentation, and the date and venue of the public hearing at least 15 days and again at least seven days in advance of the event. The hearing will allow the public to formally provide comments on the preferred alternative and potential effects to the social and natural environments. Comments will be accepted for a period of 15 days following the hearing. A Notice of Availability (NOA) will be advertised in the same local publications and mailed to the established mailing list compiled for the project, announcing the availability of the approved environmental document and disposition of public comments.

### **NEPA Determination**

Subsequent to the satisfactory completion of the public involvement process, and if determined appropriate, a request for preparation of a Finding of No Significant Impact (FONSI) will be submitted to FHWA through INDOT. All comments received during this period will be listed and individually addressed in the disposition of comments attachment included in the FONSI request packet. If any comments cause a re-examination or require a change to the EA, an Additional Information (AI) document may be prepared and approved by FHWA prior to the submission of the FONSI request to FHWA. The preparation of the FONSI by FHWA will indicate the NEPA process for this project has been completed. Individuals included on the mailing list for the project, which includes the identified adjacent landowners, attendees of the public information meeting and the public hearing, as well as others who have submitted a request for project specific information, will be notified by U.S. Mail of the FONSI issuance by FHWA. In addition, a public notice announcing the availability of the FONSI will be advertised in local publications of general circulation.

INDOT will continue public outreach activities through the remainder of the North Split Project.

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### Public Controversy on Environmental Grounds

Will the project involve substantial controversy concerning community and/or natural resource impacts?

Yes

No

Remarks:

There has been public controversy concerning potential community impacts of the North Split Project. After the preliminary project scope was presented in the initial kick-off meetings, several community groups submitted comments suggesting INDOT consider broadening the scope to include all downtown interstates, not just the North Split area. These comments suggested alternatives such as diverting traffic off the interstates to other routes, converting downtown interstates to boulevards, and/or depressing or tunneling the interstates below ground level.

Although not a formal step in the NEPA process, INDOT conducted a System-Level Analysis (<https://northsplit.com/wp-content/uploads/2018/05/North-Split-System-Level-Analysis.pdf>) to assess the performance, cost, and impact of seven large-scale potential changes to I-65 and I-70 through downtown Indianapolis. The purpose was to inform public dialogue about the future of the downtown interstates and to help better define the scope of the North Split Project. The System-Level Analysis determined:

- The North Split interchange should tie in with the existing interstate system;
- An environmental study for improvements to the North Split interchange study should move forward, with the scope of the project to be defined through that study process [note, this refers to the NEPA process and this EA];
- Project-level alternatives for improving the North Split interchange would be developed to best meet the project purpose and need while minimizing impacts to the surrounding environment; and
- Comments on the System-Level Analysis would be considered in developing the project-level alternatives for the North Split Project, and efforts would be made to minimize the project footprint and incorporate other measures to respond to community concerns.

The System-Level Analysis report was published on May 3, 2018 and the results were presented to project stakeholders during May 2018. A public open house was held to present the results of the System-Level Analysis on May 23, 2018, and public comments were accepted until June 14, 2018.

INDOT published a project-level Alternatives Screening Report in September 2018 (Appendix A, pages 33-133). This report identified Alternative 4c as INDOT's preliminary preferred alternative for the North Split Project. The Alternatives Screening Report was available for public comment from September 28, 2018 through November 3, 2018. INDOT made refinements to Alternative 4c regarding I-65 access to the collector-distributor (C-D) road to address the feedback received and identified the result as the preferred alternative.

INDOT has considered public feedback throughout the North Split Project development process. Public engagement has informed the selection of a preferred alternative and defined the key features of the project, including:

- Minimizing the number and height of retaining walls;
- Minimizing interstate widening by not adding through lanes;
- Reducing the interchange footprint;
- Establishing CSS design features;
- Keeping Vermont Street open to vehicular traffic under the interstates; and
- Maintaining I-65 access to the Michigan, Ohio and Fletcher exits.

INDOT will continue public outreach activities after the NEPA process is complete to inform the public of maintenance of traffic changes and provide updates during construction.

#### **Avoidance, Minimization, and Mitigation Efforts**

INDOT has made efforts throughout the North Split project development process to avoid and minimize impacts of the project on adjacent neighborhoods. As part of the alternatives screening process, Alternative 4c was identified as the preliminary preferred alternative because it met the purpose and need and did not require additional right-of-way. It addressed the top four safety concerns within the interchange, while minimizing the need for additional

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width along the interstate. Alternative 4c does not add through lanes to the interstate system, which was identified as a notable public concern with the project. It also eliminates or minimizes the need for retaining walls along the interstate legs. Alternative 4c results in a more compact interchange, moving some interchange ramps further away from residential areas.

Noise has been a concern expressed by the public since the start of the North Split Project. To help address this concern, INDOT is committed to using several techniques to minimize noise. The use of continuous reinforced concrete pavement will eliminate transverse joints, which are the cause of rhythmic sound patterns with traditional concrete roadways. The North Split Project will replace most of the existing bridges with jointless concrete bridges. This design eliminates the open joints at the end of bridges, which are the cause of the loud sounds typically heard at older bridges, such as those currently existing in the project area.

The project will use “next generation grooving” on the pavement. This new paving technique is designed specifically to reduce tire noise through the use of longitudinal grooves. Although results vary based on tire manufacturer, existing pavement type and condition, and other factors, recent studies have shown next generation pavement can reduce tire noise levels by 3 to 5 decibels or more.<sup>1</sup>

Based on the proximity of buildings to construction activities, effects from vibration are possible. Vibration impacts could occur in residential areas and at other vibration-sensitive land uses from activities associated with construction of the project, such as excavation, demolition, and vibratory compaction, as well as pile-driving at bridges, possible noise walls, and retaining walls. The potential for vibration impact would be greatest at locations near pile-driving for bridges and other structures, pavement demolition for removal, and vibratory compactor operations.

In order to address these possible effects, the design-build team will be required to prepare a construction Vibration Monitoring and Control Plan. This plan includes pre-construction surveys of historic buildings, monitoring vibration during construction, post-construction surveys, and keeping the public informed of construction activities known to be a source of vibration. The design-build team will also be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties. Because the design-build team will be required to keep vibration levels under the maximum damage risk thresholds, no adverse effects to historic properties are anticipated from construction-induced vibration.

CSS is a collaborative, interdisciplinary decision-making process and design approach that involves all stakeholders to develop a transportation facility that fits its physical setting. For the North Split Project, INDOT conducted a robust CSS process made up of three main parts: Visioning, Preliminary Design Treatments, and Design Guidelines Package (Appendix G, pages 178-213). During the Visioning stage, six neighborhood meetings were held in March and April 2019 to get community feedback on what types of project elements were important. During the Preliminary Design Treatments stage, six neighborhood meetings and one public open house were held in July and August 2019 to get community feedback on possible design options and additional opportunities developed in response to the Visioning stage. Possible design options included elements such as abutment walls, piers and columns, retaining walls, lighting, public art space, landscape, vegetation, and side slope treatments. Additional opportunities, including improved local connectivity and open space enhancements, were also presented for community feedback in the Preliminary Design Treatments stage.

As a result of the CSS process, INDOT developed the North Split Aesthetic Design Guidelines which are available in Appendix G, pages 214-326. The Aesthetic Design Guidelines include treatments for the interstate infrastructure (such as underpass treatments, sidewalks, public art space, retaining walls, abutment walls, bridge columns, lighting, signage, and fencing) as well as landscaping within the existing right-of-way. Also, as a result of the CSS process, INDOT will keep portions of the Monon Trail detour as a permanent feature after construction.

Specific commitments are included in *Section J – Environmental Commitments* of this document.

<sup>1</sup> American Concrete Pavement Association and International Grooving and Grinding Association, *Development and Implementation of the Next Generation Concrete Surface*, August 8, 2017, pp 36-37.

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### Part II - General Project Identification, Description, and Design Information

Sponsor of the Project: Indiana Department of Transportation (INDOT) INDOT District: Greenfield  
Local Name of the Facility: I-65/I-70 North Split Interchange

Funding Source (mark all that apply): Federal  State  Local  Other\*

\*If other is selected, please identify the funding source: \_\_\_\_\_

#### **PURPOSE AND NEED:**

*Describe the transportation problem that the project will address. The solution to the traffic problem should NOT be discussed in this section. (Refer to the CE Manual, Section IV.B.2. Purpose and Need)*

#### Need

Four needs have been identified for the North Split Project. These project needs are summarized below. Additional information regarding the identified needs is included in the Alternatives Screening Report (Appendix A, pages 45-59).

#### Correct Deteriorated Bridge Conditions

All bridges in the project area are showing wear due to continuous use by large traffic volumes and weather-related deterioration over a long period of time. The concrete on many bridges is cracked, split, broken off, damaged from salt and leaking water, and patched to correct previous problems. Steel used to reinforce the concrete is often exposed and rusted. Steel bridge components – such as beams, bearing plates, and hinges – are also rusted, some so severely their function is compromised. Of the 31 bridges, 27 are estimated to have less than 10 years of remaining service life before major repairs or reconstruction are needed. Eleven bridges have fewer than five years of remaining service life.

#### Correct Deteriorated Pavement Conditions

When the North Split interchange was constructed in 1968, the design life of the concrete pavement was 30 years. This original pavement is still in place and is showing age-related wear. The pavement surface has become “polished” over time, which reduces friction for vehicles traveling along the roadway. Pavement friction tests indicate that project area pavement has low friction values, which can increase the likelihood of skidding during wet conditions. To evaluate how the pavement affects ride quality and to estimate design life, INDOT uses an international roughness index (IRI), which measures pavement surface deviations (irregularities or “bumpiness”). As the IRI increases, ride quality decreases. The IRI values for mainline pavement in the project area range from 166 to 201. These values exceed the threshold value of 160, which indicates the pavement is at or beyond the end of its useful life.

Frequent patching to repair cracks and holes in the mainline concrete pavement, especially along I-65/I-70 south of the North Split, requires lane closures and results in traffic delays. Asphalt shoulders are in poor condition and are starting to oxidize, which is a process where pavement becomes brittle and cracks. Water in the cracks freezes and expands during winter conditions, which causes further damage. Aggregate particles in the shoulders are coming loose, a condition referred to as raveling, which can cause the shoulders to have poor traction when wet and leaves loose debris on the roadway. INDOT testing shows the shoulder pavement has failed in some areas and requires full replacement.

#### Improve Safety

The project team analyzed crashes in the project area between 2012 and 2016. The analysis included crashes on mainline I-65 and I-70, the westbound I-70 to southbound I-65 C-D road, and the directional ramps in the North Split interchange. Crashes on ramps between the interstates and local roadways were not included to allow comparisons between the North Split and urban interstates statewide.

The crash rates per 100 million vehicle miles traveled were determined for fatality, injury, and property damage crashes. The North Split crash rate was higher in all categories than crash rates experienced on other urban interstates in Indiana. Property damage crashes were about 2.3 times higher, and injury crashes were 2.8 higher. Crash rates per vehicle miles traveled indicate conditions other than high traffic volumes contribute to the large number of crashes.

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The project is intended to improve safety by reducing or eliminating conditions that result in crashes for traffic using I-65 and I-70. Based on roughly tenth mile location data provided by crash reports, the top four crash sites in the North Split project area between 2012 and 2016 are listed below:

1. I-65 northbound at Meridian/Pennsylvania Street exit ramp weave on the west leg of North Split
2. I-65 southbound at Meridian/Delaware Street entrance ramp weave on the west leg of North Split
3. I-65 southbound and I-70 westbound merge point on the south leg of North Split
4. I-70 eastbound, abrupt curve from the south leg to the east leg of North Split

These four sites account for approximately 20% of the total crashes in the project study area.

### Improve Interchange Operations and Reduce Congestion

“Operations” is a term used to describe the intended function of an interchange to distribute traffic through the area on an appropriate path to reach an intended destination. Interchange operations are negatively affected by high traffic volumes, substandard design features (such as sharp curves), merge areas where lanes join together, and weaving areas where traffic movements cross each other. Three legs of the interstate highway system converge at the North Split, which require a series of weaves, merges, and diverging movements to make some connections. In the morning, northbound and westbound traffic experiences a breakdown in operations. In the evening, the southbound and eastbound traffic experiences congestion and on-ramp traffic backups occur. This traffic congestion increases the potential for vehicle crashes, particularly rear-end crashes, that occur during stop-and-go conditions.

Critical locations where traffic congestion occurs are referred to as “bottlenecks.” As identified in their publication “Traffic Bottlenecks: A Primer – Focus on Low-Cost Solutions,” FHWA has identified nine conditions that generally create bottlenecks in interchange areas. One of these, “freeway to freeway interchanges,” defines the North Split interchange itself. Others refer to specific conditions within the interchange. Four bottleneck conditions identified by the FHWA guidance document exist in the North Split interchange. The most severe bottlenecks in the North Split are the weaving sections at the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp.

Level of Service (LOS) provides a common “grading” scale for describing traffic congestion on roadways, from LOS A (best) to LOS F (worst) (Appendix A, page 56). LOS A represents near ideal traffic flow, while LOS F represents a breakdown of the traffic flow. LOS relates to operations, not the physical condition of the roadway. Today, many of the freeway sections in the project area operate below LOS D during one or both peak hours. Some sections currently operate at LOS E or LOS F. With no changes to the configuration of the interchange, future operations are forecasted to be worse.

INDOT’s minimum standard for peak hour operations on interstate highways is typically LOS D, with desired LOS C when practical. Deviations from this standard occur in some cases, however, when achievement is not feasible and practical due to the restrictive environment of urban areas. While improving the operations of the North Split interchange is an identified need for this project, the actual LOS to be achieved will be balanced with cost and impact.

### Purpose

The purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities within the North Split project area. The North Split Project must meet the following transportation needs:

- **Correct deteriorated bridge conditions.** The project is intended to correct deteriorated bridge conditions on the interstates within the North Split project area.
- **Correct deteriorated pavement conditions.** The project is intended to correct the deteriorated pavement conditions on the interstates within the North Split project area.
- **Improve safety.** The project is intended to improve safety by reducing or eliminating conditions that contribute to crashes along I-65 and I-70.
- **Improve interchange operations and reduce congestion.** The project is intended to improve operations in the North Split project area by removing weaving sections and improving level of service now and in 2041. Typically, projects are planned and designed for 20 years after the construction timeframe in order to take into account projected future conditions.

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### PROJECT DESCRIPTION (PREFERRED ALTERNATIVE):

County: Marion Municipality: Indianapolis

Limits of Proposed Work: From the I-70 Valley Avenue bridge to the east, the I-65/I-70 and Washington Street interchange to the south (approximately 370 feet south of Washington Street), and the I-65 Alabama Street bridge (to Illinois Street along 11<sup>th</sup> and 12<sup>th</sup> Streets) to the west

Total Work Length: 3.1 Mile(s) Total Work Area: ~185 Acre(s)

Is an Interchange Modification Study / Interchange Justification Study (IMS/IJS) required?	<b>Yes<sup>1</sup></b>	<b>No</b>
If yes, when did the FHWA grant a conditional approval for this project?	<b>X</b>	
	Date: August 12, 2019	

<sup>1</sup>If an IMS or IJS is required; a copy of the approved CE/EA document must be submitted to the FHWA with a request for final approval of the IMS/IJS.

In the remarks box below, describe existing conditions, provide in detail the scope of work for the project, including the preferred alternative. Include a discussion of logical termini. Discuss any major issues for the project and how the project will improve safety or roadway deficiencies if these are issues.

#### **Location**

I-65 and I-70 are nationally significant corridors, serving the Midwest and United States in four directions. The North Split is the second-most heavily traveled interchange in Indiana, serving about 214,000 vehicles per day. The project limits include the 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 Alabama Street (to Illinois Street along 11th and 12th Streets); and the portion of I-70 east of the North Split interchange to the bridge over Valley Avenue (west of the Keystone Avenue/Rural Street interchange) in downtown Indianapolis, Marion County, Indiana. The project 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 (Appendix B, pages 1-16).

#### **Existing Conditions**

I-65 and I-70 are unofficially known as the “inner loop” where they pass through downtown Indianapolis. The inner loop is approximately 4.5 miles long and provides 25 entrance and exit ramps serving all sections of downtown. The North Split interchange was constructed in stages. The I-65 legs to the west and south were completed in 1968, and the east leg to I-70 was completed in 1976. As in many urbanized areas during the early era of interstate highways, construction of the interstates in Indianapolis had substantial community impacts, displacing residents and separating existing neighborhoods in and near downtown. The adjacent land is highly developed. The interchange was designed for an additional interstate highway to the north, called I-165 or the “Northeast Freeway.” The Northeast Freeway was proposed to link the North Split interchange with I-69 near Castleton. The I-165 project was abandoned in 1980 and the spur was removed from the interstate system.

INDOT determined the North Split requires repair based on the deteriorated condition of existing infrastructure, and existing safety and traffic operation concerns of the interchange. Bridges located in or near the interchange require rehabilitation or replacement due to poor structural condition. The existing pavement also requires rehabilitation or replacement. In addition to its poor physical condition, the interchange configuration is inefficient and poorly suited for the volumes of traffic it is serving. Reconstructing the interchange will provide the opportunity to replace deteriorated infrastructure, improve safety and reduce congestion by realigning ramps and merges in the interchange area, and correcting existing weaving problems (Appendix A, pages 45-59).

#### **Preferred Alternative**

INDOT completed an Alternatives Screening Report for the North Split Project as part of the NEPA process on September 21, 2018 (Appendix A, pages 33-133), and made it 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. Alternative 4c, as described in the Alternatives Screening Report, has been refined since that report was published and is now referred to as the preferred alternative (Appendix B, pages 3-16 and 47-109).

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Alternative 4c was designed to meet the project purpose and need while minimizing pavement widening and retaining walls. To accomplish this, some interstate access to and from downtown was eliminated. Westbound traffic from I-70 would no longer be able to exit at the Pennsylvania Street ramp and southbound traffic from I-65 would no longer have access to the C-D road. The C-D road provides access to North Street, Michigan Street, Vermont Street, New York Street, Ohio Street, and Fletcher Avenue.

Responding to public comment on the Alternatives Screening Report, Alternative 4c was refined in the preferred alternative to reestablish the connection of I-65 southbound to the C-D road. To maintain the minimal widening and retaining wall construction, the Delaware Street entrance ramp connection to the C-D road was eliminated instead. This is an indirect movement (going north to go south) and is used by a much smaller number of motorists. The Delaware Street entrance ramp will connect directly to I-70 eastbound. As in the original preliminary preferred alternative, I-70 access to the Pennsylvania Street exit ramp will not be available in the preferred alternative, but traffic models show most of this traffic will divert to the C-D road rather than West Street, which will minimize traffic impacts.

No new right-of-way will be required for the project. The preferred alternative includes the following project elements:

- Reconstruction of the North Split interchange to correct the top four safety concerns:
  1. I-65 northbound at Meridian/Pennsylvania Street exit ramp weave on the west leg of North Split
  2. I-65 southbound at Meridian/Delaware Street entrance ramp weave on the west leg of North Split
  3. I-65 southbound and I-70 westbound merge point on the south leg of North Split
  4. I-70 eastbound, abrupt curve from the south leg to the east leg of North Split
- Replacement or rehabilitation of the bridges throughout the project area. Bridge aesthetic treatments will be in accordance with the North Split Aesthetic Design Guidelines;
- Replacement of the interstate pavement throughout the project area with jointless continuous reinforced concrete using “Next Generation” (longitudinal) pavement grooving;
- Reconstruction of the Pennsylvania Street exit ramp, which will eliminate I-70 westbound access to this ramp. I-65 northbound traffic will still have access;
- Reconstruction of the Delaware Street entrance ramp, which will eliminate access to I-65 southbound and the C-D road. Traffic entering from the Delaware ramp will still be able to access I-70 eastbound. I-65 southbound traffic will be able to access the C-D road;
- Reconfiguration of the interchange so that northbound I-65 and eastbound I-70 traffic do not have to cross paths between the South Split and the North Split (also known as the “big weave”);
- Modification of the Pine Street entrance to I-65 northbound to provide a one-lane ramp on the right of I-65, replacing the existing two-lane ramp entering I-65 on the left;
- Construction of retaining walls or vegetated slopes (or a combination of the two) along the interstate. Side slope treatments will be in accordance with the North Split Aesthetic Design Guidelines;
- Landscaping within the existing right-of-way in accordance with the North Split Aesthetic Design Guidelines;
- Possible construction of noise barriers (NB3E and NB3W) for abatement (determined in accordance with INDOT’s Traffic Noise Analysis Procedure);
- Traffic signal modifications and possible installation of Americans with Disabilities Act (ADA) curb ramps at the following intersections: 12<sup>th</sup> Street and Pennsylvania Street, 12<sup>th</sup> Street and Meridian Street, 12<sup>th</sup> Street and Illinois Street, 11<sup>th</sup> Street and Delaware Street, 11<sup>th</sup> Street and Pennsylvania Street, 11<sup>th</sup> Street and Meridian Street, 11<sup>th</sup> Street and Illinois Street, I-65/I-70 at Pine Street and Michigan Street, and Ohio Street and College Avenue;
- Temporary improvements at Washington Street and the interstate exit and entrance ramps to improve traffic flow during construction. All work will be within the existing pavement area. No work to outside curbs will be completed. Portions of the concrete triangular median in the southwest quadrant will be removed to allow for an additional entrance lane to the interstate. Lanes will be re-stripped and bags will be placed over traffic signal heads. These changes will be removed after construction;

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- Construction and installation of drainage systems (detention basins, pipes, structures, storage facilities, and ditches);
- Reconstruction of a portion of the Old Northside Trail within the O'Bannon Soccer Park and construction of a trail within existing INDOT and City of Indianapolis right-of-way to be a detour for the Monon Trail during construction with portions remaining as a permanent trail (Monon Loop) after construction;
- Reconstruction and widening (from 10 feet to 14 feet) of the Monon Trail through the interchange;
- Reconstruction and widening of sidewalks along local roads under interstate bridges;
- Replacement of light poles and high mast light towers along the interstate;
- Relocation of the Intelligent Transportation Systems (ITS) tower and possible addition of a new tower within the interchange and installation of ITS signage within the project area;
- Replacement of existing signage along the interstates and wayfinding signage along local streets;
- Relocation of overhead power lines and installation of new utility poles;
- Relocation of existing utilities and storm sewers within the existing right-of-way; and
- Installation of fiber optic conduits and access vaults within the existing right-of-way.

Design information utilized in this EA is preliminary and could change slightly during final design. Any changes are anticipated to occur within the existing right-of-way. Changes that result in new environmental impacts will be documented in an Additional Information (AI) environmental document.

### Maintenance of Traffic (MOT)

During North Split construction, through traffic on I-65 and I-70 heading into Indianapolis will be directed and detoured around I-465. Access to all downtown exits and entrances outside the project area will be maintained during construction, including connections to Washington Street from I-65/I-70. Additional information on the project MOT is included in the *Maintenance of Traffic (MOT) During Construction* section below.

### Fulfillment of Purpose and Need

The preferred alternative meets the project purpose of rehabilitating and improving the existing interstate facilities within the North Split project area. The preferred alternative meets the following transportation needs established for the project (Appendix A, pages 45-59):

- **Correct deteriorated bridge conditions.** With the exception of four I-70 bridges on east leg of the interchange, all existing bridges will be replaced within the North Split project area. The four bridges on I-70, located at Commerce Avenue and Valley Avenue, were reconstructed in 2007.
- **Correct deteriorated pavement conditions.** All interstate pavement in the North Split project area will be replaced.
- **Improve safety.** Reconfiguring the interchange will improve safety by reducing or eliminating unsafe movements for the four the highest crash locations and by providing other safety improvements in the interchange area. Specifically, it will improve operations by eliminating the weaving sections at the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. The curvature of I-70 will be realigned to be less abrupt, improving safety at that location, and the merge of I-65 southbound and I-70 westbound will be improved.
- **Improve interchange operations and reduce congestion.** Reconfiguring the interchange will improve operations by eliminating the weaving sections at the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. Northbound traffic flow and safety will be improved on I-65 and I-70 by eliminating the "big weave" between the South Split and North Split.

### Logical Termini and Independent Utility

Logical termini are defined as rational end points for a transportation improvement and rational end points for a review of the environmental impacts. The layout and condition of connecting roadways are considered in defining the logical termini of the project. To the east, the logical terminus is where I-70 crosses over Valley Avenue, where bridge reconstruction and pavement

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replacement east of the bridge was performed in 2007. To the west, the logical terminus of the project area is I-65 near Alabama Street for the mainline, and Illinois Street for the ramps on each side of I-65 to provide local access both north and south. The I-65 pavement reconstruction would terminate just short of the long bridge over several local roads (Alabama, Delaware, Pennsylvania, Meridian, Illinois Streets; Capitol and Senate Avenues). This bridge was recently repaired and does not require replacement. South of the interchange, the logical terminus is the Washington Street interchange, which allows for inclusion of improvements for a series of deteriorated bridges. The pavement was replaced south of Washington through the South Split interchange.

The North Split Project has independent utility. The project will improve deteriorated pavement and bridge conditions and correct safety and operational problems within the North Split interchange project area. It will improve existing conditions, even if no additional transportation improvements in the area are implemented.

### OTHER ALTERNATIVES CONSIDERED:

*Describe all discarded alternatives, including the Do-Nothing Alternative and an explanation of why each discarded alternative was not selected.*

INDOT published an Alternatives Screening Report in September 2018 identifying Alternative 4c as INDOT's preliminary preferred alternative for the North Split Project (Appendix A, pages 33-133). The Alternatives Screening Report was available for public comment from September 28, 2018 through November 3, 2018. Public comments and responses to public comments on the Alternatives Screening Report are available at [www.northsplit.com](http://www.northsplit.com). As described in the Alternatives Screening Report in Appendix A, alternatives that were analyzed and eliminated from further consideration are summarized below.

#### **Alternative 1 – No Build**

With the No Build Alternative, the existing interchange would stay as it is, without replacement of pavement and bridges. The No Build Alternative would require frequent maintenance and rehabilitation projects to maintain the safety and integrity of the interstate facility and local street connections. These maintenance projects could include pavement patching or overlay, bridge reinforcement or rehabilitation, drainage improvements, and signing and lighting maintenance. No safety or operational (capacity and/or congestion or weaving) improvements would be made. The number of lanes and their locations in the system would remain the same as existing. The existing ramp connections to local streets would not change. Pavement and bridges would continue to be in poor condition and safety would not be improved. Existing safety concerns and bottlenecks would remain in place and existing congestion would continue and likely worsen over time. This alternative would not result in community or environmental impacts. Since the No Build Alternative would not meet the project purpose and need, it was eliminated from further consideration.

#### **Alternative 2 – Transportation System Management (TSM) Alternative**

Transportation System Management (TSM) alternatives include activities which maximize the efficiency of the present transportation system by changing its operation. These projects focus on improving traffic flow and reducing traveler delay. TSM alternatives are often evaluated along with Transportation Demand Management (TDM) options, which focus on changing travel behavior (trip rates, trip length, travel mode, time-of-day, etc.). Park and ride facilities, shifting/separating freight movements, and bicycle/pedestrian facilities are examples of TSM/TDM alternatives. Several potential TSM actions were reviewed for potential application in the North Split. Examples of TSM actions include traffic incident management, traffic detection and surveillance, traveler information services, driving on shoulders, ramp metering, and restriping weave areas (Appendix A, pages 65-68). Most of these actions would not be applicable to North Split conditions, and none of the actions would meet the project purpose and need with respect to pavement and bridge conditions, safety needs, or operational deficiencies. Therefore, the TSM alternative was eliminated from further consideration.

#### **Alternative 3 – Replace Bridges and Pavement In-Kind**

With Alternative 3, the existing bridges and pavement would be rehabilitated or replaced at their current locations. Alternative 3 would meet the first two project needs, to correct existing bridge deficiencies and pavement deficiencies, but it would not address needs related to safety and operations. No operational or capacity improvements would be completed. The cost to replace the bridges and pavement would be substantial, with no safety and operational benefit. Since Alternative 3 would not meet the project purpose and need, it was eliminated from further consideration.

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### **Alternative 4 – Efficient Interchange Reconstruction**

With Alternative 4, bridges and pavement would be replaced within the project area, and ramps and connecting roadways would be realigned to provide more direct connections and smoother curves, which would improve safety and operations through the project area. Because the interchange would serve three legs instead of the four legs it was originally designed for, Alternative 4 would be more compact than the existing interchange. No additional through lanes would be constructed with Alternative 4.

A key criterion in defining Alternative 4 is the elimination of the existing weaves at the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. Alternative 4 included three options for correcting these weaves. Alternative 4c was identified as the preferred alternative and is discussed in the *Project Description (Preferred Alternative)* section above. The other two Alternative 4 options, 4a and 4b, are described below.

### **Alternative 4a**

Alternative 4a would close the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. Since these movements would no longer be available, there would be no need for traffic to cross paths and the existing weaves would be eliminated.

Alternative 4a would meet the project purpose and need, but it would do so at the expense of those who currently use the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. Traffic diverted from these ramps to adjacent interchanges would result in traffic concentrations that would cause the operations of nearby intersections to fail. Based on the loss of access and the availability of another option that meets the project purpose and need with fewer traffic impacts, Alternative 4a was eliminated from further consideration.

### **Alternative 4b**

Alternative 4b would reconfigure the interchange and the west leg to separate the movements that currently cross paths in the weave areas. This would eliminate the weaves and accommodate all movements. A two-lane exit ramp would be provided on the north, and a one-lane entrance ramp would be provided on the south side of the I-65 mainline.

Alternative 4b would meet the project purpose and need. It would provide all traffic movements that currently exist at the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. It would also require the construction of retaining walls 18 feet to 33 feet maximum height on the west leg of the interchange. Due to the need for relatively tall retaining walls adjacent to historic residential areas, and the availability of another option that meets the project purpose and need with fewer impacts, Alternative 4b was eliminated from further consideration.

### **Alternative 5 – Full Interchange Reconstruction**

Alternative 5 would realign ramps and connecting roadways to improve safety and operations, with flexibility for accommodating predicted 2041 traffic growth with an acceptable level of service at nearly all locations in the interchange. All existing bridges and pavement would be replaced with Alternative 5, and most components including shoulders would be designed in accordance with the Indiana Design Manual. The existing weaving movements at the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp would be eliminated and all movements to and from the ramps would be accommodated. I-65 northbound and I-70 eastbound alignments would be reversed on the south leg of the interchange to eliminate the “big weave” between the North Split and South Split.

Alternative 5 would add through lanes along the interstates. On the west leg, an additional through lane would be added each way, and two lanes would be provided on the Meridian/Pennsylvania Street exit ramp and the Meridian/Delaware Street entrance ramp. The east leg would include an added westbound through lane, and one to two through lanes would be added on various segments of the south leg. Added lanes would be provided for several of the connecting ramps through the interchange. All shoulders along the mainlines would be 12 feet wide, with an additional two-foot buffer along concrete barrier walls.

Alternative 5 would provide the best service, but it would also have the greatest impacts of the alternatives with respect to right-of-way acquisition, relocations, and visual impacts. It includes elements that are deemed unacceptable to the community, with wider pavement and taller retaining walls than the other alternatives. It would potentially result in a Section 4(f) use of a historic district. Since other alternatives are available that meet the project purpose and need with fewer impacts, Alternative 5 was eliminated from further consideration.

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**The Do Nothing Alternative is not feasible, prudent or practicable because (Mark all that apply):**

It would not correct existing capacity deficiencies;

It would not correct existing safety hazards;

It would not correct the existing roadway geometric deficiencies;

It would not correct existing deteriorated conditions and maintenance problems; or

It would result in serious impacts to the motoring public and general welfare of the economy.

Other (Describe)

X
X
X

### ROADWAY CHARACTER:

#### I-65 (at Central Avenue)

Functional Classification:	<u>Urban Freeway</u>			
Current ADT:	<u>53,313 SB/</u>	VPD (2021)	Design Year ADT:	<u>54,650 SB/</u>
	<u>51,774 NB</u>		<u>58,376 NB</u>	VPD (2041)
Design Hour Volume (DHV):	<u>4,372 SB / 5,429 NB</u>	Truck Percentage	<u>5% SB / 4% NB</u>	
Designed Speed (mph):	<u>55</u>	Legal Speed (mph):	<u>55</u>	

	Existing	Proposed
Number of Lanes:	4 @ 12-foot NB / 4 @ 12-foot SB	4 @ 12-foot NB / 4 @ 12-foot SB
Type of Lanes:	3 through / 1 exit / 3 through / 1 entrance	3 through / 1 exit / 3 through / 1 entrance
Pavement Width:	64 ft NB / 64 ft SB	82 ft NB / 82 ft SB
Shoulder Width:	10 ft Outside / 6 ft Inside	10 ft Outside / 6 ft Inside 10 ft Outside / 8 ft Inside for ramps
Median Width:	N/A	N/A
Sidewalk Width:	N/A	N/A

#### I-70 (at Commerce Avenue)

Functional Classification:	<u>Urban Freeway</u>			
Current ADT:	<u>93,737 WB/</u>	VPD (2021)	Design Year ADT:	<u>99,926 WB/</u>
	<u>100,568 EB</u>		<u>112,807 EB</u>	VPD (2041)
Design Hour Volume (DHV):	<u>9,493 WB / 9,927 EB</u>	Truck Percentage	<u>12% WB / 13% EB</u>	
Designed Speed (mph):	<u>55</u>	Legal Speed (mph):	<u>55</u>	

	Existing	Proposed
Number of Lanes:	5 @ 12-foot EB / 5 @ 12-foot WB	5 @ 12-ft EB & 1 lane tapering to existing / 5 @ 12-ft WB
Type of Lanes:	5 through / 5 through	5 through & lane taper / 5 through
Pavement Width:	88 ft EB / 88 ft WB	94 ft EB (varies, tapering from 6 to 5 lanes over bridge) / 88 ft WB
Shoulder Width:	14 ft Outside / 14 ft Inside	14 ft Outside / 14 ft Inside
Median Width:	N/A	N/A
Sidewalk Width:	N/A	N/A

#### I-65/I-70 (at Michigan Street) (does not include C-D road)

Functional Classification:	<u>Urban Freeway</u>			
Current ADT:	<u>58,288 SB/</u>	VPD (2021)	Design Year ADT:	<u>64,063 SB/</u>
	<u>62,989 NB</u>		<u>76,198 NB</u>	VPD (2041)
Design Hour Volume (DHV):	<u>5,125 SB / 6,553 NB</u>	Truck Percentage	<u>10% SB / 9% NB</u>	
Designed Speed (mph):	<u>55</u>	Legal Speed (mph):	<u>55</u>	

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	Existing	Proposed
Number of Lanes:	4 @ 12-ft NB / 3 @ 12-ft SB	4 @ 12-ft NB / 3 12-ft SB
Type of Lanes:	4 through / 3 through	4 through / 3 through
Pavement Width:	68 ft NB / 56 ft SB	66 ft NB (varies due to gore over bridge) / 54 ft SB
Shoulder Width:	12 ft Outside / 8 ft Inside	12 ft Outside / 8 ft Inside NB / 11 ft Outside / 7.7 ft Inside SB
Median Width:	N/A	N/A
Sidewalk Width:	N/A	N/A

Remarks: Roadway Character information and tables for local roads crossing under the interstate within the project area are included in Appendix A, pages 2-5.

### DESIGN CRITERIA FOR BRIDGES

Structure/NBI Number(s): See Appendix A, pages 6-32 Sufficiency Rating: See Appendix A, pages 6-32

Remarks: Design Criteria for Bridges information and tables for bridges within the project area are included in Appendix A, pages 6-32.

### MAINTENANCE OF TRAFFIC (MOT) DURING CONSTRUCTION:

	Yes	No
Is a temporary bridge proposed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is a temporary roadway proposed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Will the project involve the use of a detour or require a ramp closure? (describe in remarks)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provisions will be made for access by local traffic and so posted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Provisions will be made for through-traffic dependent businesses.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Provisions will be made to accommodate any local special events or festivals.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Will the proposed MOT substantially change the environmental consequences of the action?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Is there substantial controversy associated with the proposed method for MOT?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Remarks: 

INDOT's goal is to have the North Split Project completed within two years and open to traffic by the end of 2022 while maintaining mobility and access into and out of downtown Indianapolis during construction. Achieving this schedule while constructing a new interchange in the same location as the existing interchange presents major challenges for maintaining traffic. An MOT Task Group with members from INDOT, FHWA, City of Indianapolis, and design consultants investigated many different construction phasing alternatives and identified a conceptual MOT plan to meet INDOT's goal.

This project is being procured by INDOT through a Design-Build Best Value procurement process. The conceptual MOT plan is provided to the design-build teams for reference, but they will prepare their own MOT plans, phasing, and schedule.

The MOT Task Group considered four alternative approaches in developing the conceptual MOT plan, ranging from complete closure of the interchange to construction "under traffic" with all interstate movements available most of the time. Complete closure would result in extreme congestion and system back-ups, and the project would still take two construction seasons to complete. Maintaining all movements would extend the project timeframe to at least three years. The conceptual MOT plan developed by the MOT Task Group is a compromise approach that closes some movements, while keeping key access routes open.

During North Split construction, through traffic on I-65 and I-70 heading into Indianapolis will be detoured around I-465. This will reduce demand somewhat, but most peak period trips on I-70 and I-65 near downtown have an origin or destination inside the I-465 loop. The key to maintaining traffic during the North Split

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Project will be serving these locally based trips, particularly into and out of downtown.

Access to all downtown exits and entrances outside the project area will be maintained during construction, including connections to Washington Street from I-65/I-70. In addition, two primary inbound movements and two primary outbound movements will be maintained as much as possible. The conceptual MOT plan includes the following elements in the North Split Project area:

- Closure of I-65 and I-70 through movements during most of the construction period.
- Continuous operation of east-west I-65/I-70 connection across the north side of downtown, between Keystone Avenue/Rural Street and West Street interchanges. Weekend or overnight temporary closures may occur. Closure of the I-65 southbound to I-70 eastbound ramp will be allowed for up to 45 days due to overlapping bridges in this area.
- Continuous operation of two key downtown ramp connections through the North Split. Weekend or overnight temporary closures may occur.
  - On-ramp from Pine Street to eastbound I-70
  - Off-ramp to the C-D road serving Ohio Street and Michigan Street from I-70
- Phased construction of local roadway underpasses so adjacent roadways are not closed at the same time.

The MOT elements above are specified in the technical provisions provided to potential design-build teams as guidance for their preparation of a Traffic Management Plan for construction. The technical provisions also identify maximum closure periods to be provided in the design-build team’s Traffic Management Plan. It must be developed in accordance with the maximum closure durations in Table 1. The Traffic Management Plan will be reviewed by the MOT Task Group and must be approved by INDOT prior to construction.

**Table 1. Maximum Allowable Closure Periods**

Roadway Segment or Ramp	Maximum Closure
I-65/I-70 Mainline, North Split to Washington St	540 days
Fletcher Avenue exit from Collector-Distributor Road	540 days
Ohio Street exit from Collector-Distributor Road*	240 days
Michigan Street exit from Collector-Distributor Road*	240 days
Local ramps and bridges (not adjacent)	90 days
I-65 southbound to I-70 eastbound connection	45 days

*\*Ohio Street and Michigan Street not to be closed at the same time.*

Access to and through downtown Indianapolis will be maintained during North Split construction by preparing and executing a coordinated plan for traffic management and communications involving a wide range of stakeholders. A Mobility Management Plan will be used to manage traffic and reduce travel demand. A Public Involvement Plan will guide the public information activities.

The Mobility Management Plan identifies an organizational structure and approach for minimizing traffic impacts, coordinating emergency response, and informing stakeholders before and during North Split construction. The role and responsibilities of Mobility Management Plan teams are described below:

- The Mobility Management Plan Leadership Team will organize and manage the process.
- The Traffic Management Plan/MOT Team will coordinate with the design-build team’s Traffic Management Plan for the construction area, review the effectiveness of the design-build team’s MOT processes, and consider any proposed updates to the Traffic Management Plan while the work is underway.

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- The Transportation Demand Management Team will develop and implement transportation demand management strategies to reduce congestion on the roadway network by reducing the number of vehicles using the system or by shifting trip times so that peak demands are reduced. Key components are transit, ridesharing, bicycle/pedestrian enhancements, and employer programs to encourage mode shifts and non-peak travel.
- The Traffic Operations Team will develop and implement operation changes, policies, and minor improvements to minimize traffic congestion on the local roadway system during construction. These strategies include traffic signal changes, parking restrictions, Intelligent Transportation System components, and operation/enforcement actions to minimize peak hour deliveries and other restrictions to free traffic flow. A subgroup of emergency responders focuses on specific actions to maintain emergency response.

The Mobility Management Plan teams include INDOT staff, Indianapolis Department of Public Works (DPW) staff, project consultants, and key stakeholders, such as emergency response personnel. Execution of the Mobility Management Plan commenced in early 2020 and will continue throughout the construction period.

A Public Involvement Plan was developed at the beginning of the NEPA process and it continues to be updated as the project advances. Portions of this plan specific to the construction phase include the following:

- Strategies for distribution of project updates
- Identification of target audiences
- Procedures for obtaining public comments, as well as how to respond to complaints
- Techniques for use of social media outlets for specific project updates or information
- Processes and protocol for news media and elected official contacts

Direct real time information will be provided to motorists using existing Intelligent Transportation Systems and new devices supplemented by Portable Changeable Message Boards. INDOT will issue formal press releases as the project passes major milestone points and final closure dates become finalized. INDOT will also post the closures in the Condition Acquisition and Reporting System (CARS 511) which is part of the INDOT traveler information website "Trafficwise."

INDOT will inform the Indiana Motor Truck Association of the overall project plans and anticipate that they will communicate with their members, as occurred during the 2018 and 2019 interstate closures by INDOT for construction projects. INDOT will also work closely with the Indiana State Police and other emergency responders to provide current information relative to the closure periods. INDOT will facilitate coordination of construction activities with other key stakeholders through weekly public update meetings and proactive one-on-one outreach in coordination with the design-build team.

### ESTIMATED PROJECT COST\* AND SCHEDULE:

Engineering: \$ 0\* (2020) Right-of-Way: \$ 0 (20--) Construction: \$ 240,160,243\* (2020)

\*Project costs are from the current STIP. The project costs are different than found in the 2019 Initial Financial Plan  
<https://www.in.gov/dot/div/contracts/NorthSplit/documents/NorthSplit%20IFP%20certified.pdf>  
 and TIP [Appendix H, page 12]. The project costs will be updated in the TIP/STIP by INDOT as appropriate prior to Letting.

Anticipated Start Date of Construction: Winter 2020

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Date project incorporated into STIP July 2, 2019 (Appendix H, page 11)

Is the project in an MPO Area? **Yes**  **No**

If yes,

Name of MPO Indianapolis MPO

Location of Project in TIP Page 15 of 2019 List of Obligated Projects (Appendix H, page 12)

Date of incorporation by reference into the STIP July 2, 2019

**RIGHT OF WAY:**

Land Use Impacts	Amount (acres)	
	Permanent	Temporary
Residential	0	0
Commercial	0	0
Agricultural	0	0
Forest	0	0
Wetlands	0	0
Other:	0	0
<b>TOTAL</b>	<b>0</b>	<b>0</b>

*Describe both Permanent and Temporary right-of-way and describe their current use. Typical and Maximum right-of-way widths (existing and proposed) should also be discussed. Any advance acquisition or reacquisition, either known or suspected, and there impacts on the environmental analysis should be discussed.*

Remarks: The existing right-of-way varies along the interstate legs leading into the North Split interchange. Along I-65, west of the interchange, the existing right-of-way varies from approximately 35 feet to 110 north of the existing pavement, and from approximately 10 feet to 105 feet south of the existing pavement. Along I-70, east of the interchange, the existing right-of-way varies from approximately 40 feet to 125 feet northwest of the existing pavement, and from approximately 35 feet to 95 feet southeast of the existing pavement. Along I-65/I-70/C-D road, south of the interchange, the existing right-of-way varies from approximately 20 feet to 80 feet west of the existing pavement, and from approximately 10 feet to 110 feet east of the existing pavement.

This project will occur within existing INDOT and city right-of-way. Work within the city right-of-way includes tying sidewalks under bridges back into the existing sidewalks. There will be no transfer of right-of-way from the City of Indianapolis to INDOT. No permanent or temporary right-of-way will be required for this project.

If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division (ESD) and the INDOT District Environmental Section will be contacted immediately.

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**Part III – Identification and Evaluation of Impacts of the Proposed Action**

**SECTION A – ECOLOGICAL RESOURCES**

	<b>Presence</b>	<b>Impacts</b>	
		<b>Yes</b>	<b>No</b>
<b>Streams, Rivers, Watercourses &amp; Jurisdictional Ditches</b>	X		X
Federal Wild and Scenic Rivers			
State Natural, Scenic or Recreational Rivers			
Nationwide Rivers Inventory (NRI) listed			
Outstanding Rivers List for Indiana			
Navigable Waterways			

Remarks: Based on a desktop review, site visits on October 29-30, 2015; April 25-27, May 24, and October 3-5, 2016; October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by Parsons and HNTB, the aerial map of the project area (Appendix B, pages 4-16), and the water resource map in the Red Flag Investigation (RFI) report (Appendix E, page 11) there are two streams, rivers, watercourses, or jurisdictional ditches within the 0.5 mile search radius. No surface streams, rivers, watercourses, or jurisdictional ditches are present within the project area; therefore, no impacts are expected. Pogues Run is encapsulated below ground and under the project area near Ohio Street. No work will be completed on the existing pipe and there will be no impacts to Pogues Run.

A *Waters of the U.S. Determination/Wetland Delineation Report* was approved by the INDOT Ecology and Waterway Permitting Office (EWPO) on February 1, 2018 (Appendix F, pages 1-27). An Addendum to the *Waters of the U.S. Determination/Wetland Delineation Report* was completed due to an expansion of the project area and approved by INDOT EWPO on September 5, 2019 (Appendix F, pages 28-31). Portions of the *Waters of the U.S. Determination/Wetland Delineation Report* and Addendum are included in Appendix F. The full reports are available on the North Split Project website at [www.northsplit.com](http://www.northsplit.com). It was determined that there are no likely jurisdictional streams within the project area. The U.S. Army Corps of Engineers (USACE) makes all final determinations regarding jurisdiction. An approved jurisdictional determination was received from the USACE on February 3, 2020 (Appendix F, pages 35-37). The approved jurisdictional determination did not include any streams.

Early coordination letters were sent to the U.S. Environmental Protection Agency (USEPA), U.S. Fish and Wildlife Service (USFWS), the Indiana Department of Natural Resources Division of Fish and Wildlife (IDNR DFW), and the USACE on October 18, 2017 (Appendix C, pages 1-6).

In their early coordination response letter dated November 20, 2017, USEPA recommended coordination with the USACE and the Indiana Department of Environmental Management (IDEM) regarding jurisdiction, a discussion of water resources in the EA, completion of stream assessments, and inclusion of draft stream mitigation plans (if needed) in the EA (Appendix C, pages 8-15).

In their early coordination response dated November 17, 2017, IDNR DFW concurred that existing habitat features within the project area are likely low-quality features related to existing infrastructure (roadside ditches, medians, etc.) (Appendix C, pages 20-21). They did not have recommendations specific to streams but did recommend more natural approaches to storm water management.

In their early coordination response dated October 24, 2017, USFWS indicated no objection to the project as currently proposed and also provided recommendations to avoid impacts to fish, wildlife and botanical resources (Appendix C, pages 16-17).

An automated response was obtained from IDEM on October 19, 2017 (Appendix C, pages 28-31). The response included recommendations pertaining to coordination with USACE and IDEM for permitting of stream impacts.

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No written early coordination response was received from the USACE.

Four resource agency meetings have been held during the development of the project. Representatives from FHWA, INDOT, USEPA, USACE, USFWS, IDEM, IDNR, and the City of Indianapolis attended the meetings. At the first meeting held on November 3, 2017, an introduction to the project was provided. The meeting agenda, presentation, and minutes are included in Appendix C, pages 57-71. Possible stream impacts were discussed at this meeting. It was later determined these features are not streams, rather they are stormwater features. No stream mitigation will be required for the project. USACE recommended the project team obtain an approved jurisdictional determination for water resources to determine if a Section 404 permit will be required. An approved jurisdictional determination was received from USACE on February 3, 2020 (Appendix F, pages 35-37). Pogues Run was also discussed at this meeting; however, it is encapsulated under the project area and will not be impacted by the project. At the second meeting, held on May 22, 2018, the System-Level Analysis was discussed. The meeting agenda, presentation, and minutes are included in Appendix C, pages 74-84. At the third meeting, held on October 17, 2018, the Alternatives Screening Report was discussed. The meeting agenda, presentation, and minutes are included in Appendix C, pages 93-105. Streams were not discussed at the second and third resource agency meetings. At the fourth meeting, held on April 30, 2020, public involvement activities, environmental resource impacts, public survey results, noise barrier recommendations, a Section 106 update, traffic impacts during construction, and the Aesthetic Design Guidelines were discussed. The meeting agenda, presentation, and minutes are included in Appendix C, pages 106-132.

Applicable resource agency recommendations are included in *Section J – Environmental Commitments* of this document.

**Other Surface Waters**

- Reservoirs
- Lakes
- Farm Ponds
- Detention Basins
- Storm Water Management Facilities
- Other: \_\_\_\_\_

	Presence	Impacts	
		Yes	No
Reservoirs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lakes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Farm Ponds	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Detention Basins	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Storm Water Management Facilities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Remarks: Based on a desktop review, site visits on October 29-30, 2015; April 25-27, May 24, and October 3-5, 2016; October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by Parsons and HNTB, the aerial map of the project area (Appendix B, pages 4-16), and the water resource map in the RFI report (Appendix E, page 11) there are two concrete storm water management facilities within the existing right-of-way. These two features are located within the interchange area, east of College Avenue and west of I-70 westbound (Appendix B, page 7). Both structures are non-jurisdictional concrete storm water conveyance and retention structures (Appendix F, page 15). These features will be impacted by the construction of interchange ramps. Storm water will be addressed through existing and new drainage pipes and detention. No other surface waters are present within the project area; therefore, no impacts are expected.

In their early coordination response dated November 17, 2017, IDNR DFW concurred that existing habitat features within the project area are likely low-quality features related to existing infrastructure (roadside ditches, medians, etc.) (Appendix C, pages 20-21). They did not have recommendations specific to other surface waters but did recommend more natural approaches to storm water management.

In their early coordination response dated October 24, 2017, USFWS indicated they had no objection to the project as currently proposed and also provided recommendations to avoid impacts to fish, wildlife and botanical resources (Appendix C, pages 16-17).

An automated response was obtained from IDEM on October 19, 2017 (Appendix C, pages 28-31).

No written response was received from the USACE.

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Four resource agency meetings have been held during the development of the project. At the first meeting, held on November 3, 2017, an introduction to the project was provided (Appendix C, pages 57-71). At the second meeting, held on May 22, 2018, the System-Level Analysis was discussed (Appendix C, pages 74-84). At the third meeting, held on October 17, 2018, the Alternatives Screening Report was discussed (Appendix C, pages 93-105). At the fourth meeting, held on April 30, 2020, public involvement activities, environmental resource impacts, public survey results, noise barrier recommendations, a Section 106 update, traffic impacts during construction, and the Aesthetic Design Guidelines were discussed (Appendix C, pages 106-132). Other surface waters were not discussed at the resource agency meetings.

Applicable resource agency recommendations are included in *Section J – Environmental Commitments* of this document.

	<u>Presence</u>	<u>Impacts</u>
<b>Wetlands</b>	<b>Yes</b>	<b>Yes</b> <b>No</b>
	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> <input type="checkbox"/>
Total wetland area: <u>0.064*</u> acre(s)	Total wetland area impacted: <u>0.038**</u> acre(s)	

\*Includes only jurisdictional Wetlands B, C, D, E, G, H, M (USACE jurisdiction) and N (IDEM-only jurisdiction)  
 \*\*Includes only Wetlands B, C, D, E, G, and H; Wetlands M and N will be avoided by all project activities

Wetland No.	Classification	Total Size (Acres)	Impacted Acres	Comments
A	Palustrine Emergent	0.008	0.008	- Vegetation dominated by <i>Phragmites australis</i> (common reed) and <i>Schedonorus arundinaceus</i> (tall false rye grass) - Located near top of roadside embankment at an underdrain outlet and continues down the roadside embankment to the lower infield area within the North Split interchange, north of EB I-65 and west of College Ave. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
B	Palustrine Emergent	0.014	0.014	- Vegetation dominated by <i>Schoenoplectus tabernaemontani</i> (soft-stem club rush) - Located near the top of roadside embankment at an underdrain outlet and continues partially down the roadside embankment in the infield area of the North Split interchange, north of WB I-65 and east of College Ave. - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act
C	Palustrine Emergent	0.001	0.001	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located near the middle of the roadside embankment at an underdrain outlet and continues partially down the roadside embankment within the infield area of the North Split interchange, north of EB I-65 and east of College Ave. - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act
D	Palustrine Emergent	0.006	0.006	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located near the top of the roadside embankment at an underdrain outlet and continues down the roadside embankment to the lower infield area within the North Split interchange, south of EB I-70, northeast of WB I-65, and west of the Monon Trail - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act
E	Palustrine Emergent	0.009	0.009	- Vegetation dominated by <i>Eleocharis obtusa</i> (blunt spike-rush) - Located at the toe-of-slope of the roadside embankment at a concrete drainage outlet within the lower infield area of the North Split interchange, south of EB I-70, northeast of WB I-65, and west of the Monon Trail - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act

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F	Palustrine Emergent	0.010	0.010	- Vegetation dominated by <i>Typha sp.</i> (cattails) and <i>Rumex crispus</i> (curly dock) - Located at the toe-of-slope of the concrete-lined roadside embankment, adjacent to the Monon Trail, within the North Split interchange, south of EB I-70 and northeast of WB I-65 - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
G	Palustrine Emergent	0.001	0.001	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the riprap-lined roadside embankment and adjacent to the Monon Trail, within the North Split interchange, south of EB I-70 and northeast of WB I-65 - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act
H	Palustrine Emergent	0.007	0.007	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment and adjacent to the Monon Trail, within the North Split interchange, south of EB I-70 and east of NB I-65/I-70 - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act
I	Palustrine Emergent	0.013	0.013	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment and adjacent to the Monon Trail, within the North Split interchange, south of EB I-70 and east of NB I-65/I-70 - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
J	Palustrine Emergent	0.004	0.004	- Vegetation dominated by <i>Schedonorus arundinaceus</i> (tall false rye grass) and <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the riprap-slope roadside embankment and adjacent to 13th Street, within the North Split interchange, south of EB I-70 and east of the Monon Trail - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
K	Palustrine Emergent	0.003	0.003	- Vegetation dominated by <i>Typha sp.</i> (cattails) and <i>Schedonorus arundinaceus</i> (tall false rye grass) - Located east of the North Split interchange, north of EB I-70, and south of WB I-70 - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
L	Palustrine Emergent	0.030	0.030	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located east of the North Split interchange, north of EB I-70, and south of WB I-70 - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
M	Palustrine Emergent	0.006	0.006	- Vegetation dominated by <i>Typha sp.</i> (cattails) and <i>Eleocharis mamillata</i> (soft-stem spike-rush) - Located on the roadside embankment, east of the North Split interchange, north of WB I-70, west of Commerce Ave., and south of 16th St. - Poor quality - USACE jurisdictional wetland, regulated under the Clean Water Act
N	Palustrine Emergent	0.020	0.020	- Vegetation dominated by <i>Echinochloa crus-galli</i> (large barnyard grass) - Located at the toe-of-slope of the roadside embankment, below an underdrain, east of the North Split interchange, south of EB I-70, west of Commerce Ave., and north of Roosevelt Ave. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act - IDEM jurisdictional wetland, regulated as a Waters of the State
O	Palustrine Emergent	0.025	0.025	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment, below an underdrain, southeast of the North Split interchange, west of SB I-65/I-70, and south of 10th St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act

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P	Palustrine Emergent	0.021	0.021	- Vegetation dominated by <i>Phalaris arundinacea</i> (reed canary grass) - Located at the toe-of-slope of the roadside embankment, southeast of the North Split interchange, west of SB I-65/I-70, and south of 10th St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
Q	Palustrine Emergent	0.029	0.029	- Vegetation dominated by <i>Eleocharis palustris</i> (common spike-rush) and <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment, south of the North Split interchange, west of SB I-65/I-70, and south of 10th St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
R	Palustrine Emergent	0.107	0.107	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment within the center median, south of the North Split interchange, and north of St. Clair St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
S	Palustrine Emergent	0.018	0.018	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment, south of the North Split interchange, east of NB I-65/I-70, and north of St. Clair St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
T	Palustrine Emergent	0.165	0.165	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment within the center median, south of the North Split interchange, and south of St. Clair St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
U	Palustrine Emergent	0.004	0.004	- Vegetation dominated by <i>Cyperus esculentus</i> (chufa) and <i>Phragmites australis</i> (common reed) - Located at the toe-of-slope of the roadside embankment, south of the North Split interchange, west of SB I-65/I-70, and north of Michigan St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
V	Palustrine Emergent	0.004	0.004	- Vegetation dominated by <i>Typha sp.</i> (cattails) - Located at the toe-of-slope of the roadside embankment, south of the North Split interchange, west of SB I-65/I-70, and north of New York St. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
W	Palustrine Emergent	0.019	0.019	- Vegetation dominated by <i>Typha latifolia</i> and <i>Typha angustifolia</i> (cattails) - Located at the toe-of-slope of the roadside embankment, north of WB I-70 and east of Roosevelt Ave. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
X	Palustrine Emergent	0.043	0.043	- Vegetation dominated by <i>Typha angustifolia</i> (cattails) - Located at the toe-of-slope of the roadside embankment, north of WB I-70 and east of Roosevelt Ave. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act
Y	Palustrine Emergent	0.089	0.089	- Vegetation dominated by <i>Typha angustifolia</i> (cattails) - Located at the toe-of-slope of the roadside embankment, north of WB I-70 and west of Valley Ave. - Poor quality - Man-made feature constructed in uplands, not regulated under the Clean Water Act

### Documentation

### ES Approval Dates

Wetlands (Mark all that apply)

Wetland Determination  
Wetland Delineation  
USACE Isolated Waters Determination  
Mitigation Plan

X
X
X

<b>February 1, 2018/September 5, 2019</b>
<b>February 1, 2018/September 5, 2019</b>
<b>February 3, 2020 (USACE)</b>

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**Improvements that will not result in any wetland impacts are not practicable because such avoidance would result in** (Mark all that apply and explain):

- Substantial adverse impacts to adjacent homes, business or other improved properties;
- Substantially increased project costs;
- Unique engineering, traffic, maintenance, or safety problems;
- Substantial adverse social, economic, or environmental impacts, or
- The project not meeting the identified needs.

X
X

Measures to avoid, minimize, and mitigate wetland impacts need to be discussed in the remarks box.

Remarks: Wetlands within the project area were identified based on site visits on October 29-30, 2015; April 25-27, May 24, and October 3-5, 2016; October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by Parsons and HNTB, a review of the National Wetlands Inventory (NWI) online mapper (<https://www.fws.gov/wetlands/data/Mapper.html>), the USGS topographic map (Appendix B, page 2), and the RFI report (Appendix E, page 11).

A *Waters of the U.S. Determination/Wetland Delineation Report* was approved by the INDOT EWPO on February 1, 2018 (Appendix F, pages 1-27). An Addendum to the *Waters of the U.S. Determination/Wetland Delineation Report* was completed due to an expansion of the project area. The Addendum was approved by INDOT EWPO on September 5, 2019 (Appendix F, pages 28-31). Portions of the *Waters of the U.S. Determination/Wetland Delineation Report* and Addendum are included in Appendix F. The full reports are available on the North Split Project website at [www.northsplit.com](http://www.northsplit.com).

An approved jurisdictional determination was received from the USACE on February 3, 2020 (Appendix F, pages 35-37). USACE is taking jurisdiction over the following wetlands under the Clean Water Act: Wetlands B, C, D, E, G, H, and M. USACE has determined the following are man-made features constructed in uplands and not regulated under the Clean Water Act: Wetlands A, F, I, J, K, L, N, O, P, Q, R, S, T, U, V, W, X, and Y. IDEM is taking jurisdiction over Wetland N as an isolated Waters of the State (Appendix F, page 34).

There are seven USACE jurisdictional wetlands, totaling 0.044 acre, within the project limits. There is one IDEM isolated wetland, totaling 0.020 acre, within the project limits. All are poor quality features that have formed within the maintained transportation right-of-way and exhibit low species diversity. Each appears to receive hydrological input from surface water runoff or sporadic roadway underdrains. IDEM classifies isolated wetlands as Class I, II, or III, with Class I being the lowest quality. Wetland N is likely a Class I wetland.

Wetlands B, C, D, E, G, and H, totaling 0.038 acre, are anticipated to be impacted by construction of the North Split Project. Wetlands M and N will be avoided by all construction activities. Wetlands M and N will be marked as “Do Not Disturb” on design plans and temporary construction fencing shall be installed around their limits. Alternatives that avoid all wetland impacts are not practicable since the wetlands are within the existing interchange area and the interchange will be reconstructed. Avoiding all wetlands would require the acquisition of new right-of-way and substantial impacts to homes and businesses. In order to minimize community impacts, all work will remain within the existing right-of-way. Wetland mitigation will not be required because impacts do not exceed the mitigation threshold of 0.1 acre.

In an early coordination response letter dated November 20, 2017, USEPA recommended coordination with USACE and IDEM regarding jurisdiction, a discussion of water resources in the EA, completion of wetland delineations, and inclusion of draft wetland mitigation plans (if needed) in the EA (Appendix C, pages 8-15).

In their early coordination response dated November 17, 2017, IDNR DFW concurred that existing habitat features within the project area are likely low-quality features related to existing infrastructure (roadside ditches, medians, etc.) (Appendix C, pages 20-21).

In their early coordination response dated October 24, 2017, USFWS indicated no objection to the project as currently proposed and also provided recommendations to avoid impacts to fish, wildlife, and botanical resources (Appendix C, pages 16-17).

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An automated response was obtained from IDEM on October 19, 2017 (Appendix C, pages 28-31).  
 No written response was received from the USACE.

Four resource agency meetings have been held during the development of the project. At the first meeting, held on November 3, 2017, an introduction to the project was provided (Appendix C, pages 57-71). At the second meeting, held on May 22, 2018, the System-Level Analysis was discussed (Appendix C, pages 74-84). At the third meeting, held on October 17, 2018, the Alternatives Screening Report was discussed (Appendix C, pages 93-105). At the fourth meeting, held on April 30, 2020, public involvement activities, environmental resource impacts, public survey results, noise barrier recommendations, a Section 106 update, traffic impacts during construction, and the Aesthetic Design Guidelines were discussed (Appendix C, pages 106-132). Impacts to wetlands were discussed at the fourth resource agency meeting.

Applicable resource agency recommendations are included in *Section J – Environmental Commitments* of this document.

	<u>Presence</u>	<u>Impacts</u>	
<b>Terrestrial Habitat</b>		<u>Yes</u>	<u>No</u>
Unique or High Quality Habitat	X	X	

Use the remarks box to identify each type of habitat and the acres impacted (i.e. forested, grassland, farmland, lawn, etc).

Remarks: Based on a desktop review, site visits on October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by HNTB, the aerial map of the project area (Appendix B, pages 4-16), and GIS files of trees planted by Keep Indianapolis Beautiful (KIB), there are maintained grasses and herbaceous plants, mature trees, and immature trees present within the existing right-of-way.

Approximately 65.0 acres of maintained grasses and herbaceous plants are present within the existing right-of-way. Much of this is present along interstate side slopes, medians, and within the interchange infield area. The dominant species are fescue (*Festuca* sp.), common teasel (*Dipsacus fullonum*), Queen Anne’s lace (*Daucus carota*), common dogbane (*Apocynum cannabinum*), birdsfoot trefoil (*Lotus corniculatus*), Kentucky blue grass (*Poa pratensis*), tall false rye grass (*Schedonorus arundinaceus*), yellow bristle grass (*Setaria pumila*), creeping wild-rye (*Elymus repens*), crownvetch (*Securigera varia*), reed canary grass (*Phalaris arundinacea*), and common reed (*Phragmites australis*). All 65.0 acres of maintained grasses and herbaceous plants could be impacted by construction. In many cases the impacts will be temporary and areas will be re-seeded with herbaceous vegetation.

Approximately 9.1 acres of mature trees are present within the existing right-of-way. Most of these trees are along the north and south sides of I-65 west of the North Split interchange, along the right-of-way edges southwest of the interchange, and along I-70 east of the interchange. The dominant species are American sycamore (*Platanus occidentalis*), eastern redbud (*Cercis canadensis*), northern catalpa (*Catalpa speciosa*), maple (*Acer* sp.), mulberry (*Morus* sp.), and honeysuckle (*Lonicera* sp.). According to residents of the Old Northside neighborhood, many of the mature trees along the north side of I-65 west of the interchange were planted by neighborhood residents. Approximately 2.8 acres of mature trees are included in “Do Not Disturb” areas and will not be impacted by construction. Approximately 6.3 acres of mature trees are within the existing right-of-way, not within “Do Not Disturb” areas, and could be impacted by construction.

Approximately 7.5 acres of immature trees and shrubs are present within the existing right-of-way. Many of these trees and shrubs were planted by KIB, with assistance from adjacent neighborhoods. These are largely located within the interchange area and east and west of I-65/I-70 south of the interchange. The primary trees and shrubs were planted within the right-of-way from 2007 through 2011 and included: American sycamore (*Platanus occidentalis*), Allegheny serviceberry (*Amelanchier laevis*), American hornbeam (*Carpinus caroliniana*), blackgum (*Nyssa sylvatica*), eastern redbud (*Cercis canadensis*), fringetree (*Chionanthus virginicus*), hophornbeam (*Ostrya virginiana*), nannyberry (*Viburnum lentago*), pawpaw (*Asimina triloba*),

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northern catalpa (*Catalpa speciosa*), sugar maple (*Acer saccharum*), American elm cultivars (*Ulmus americana*), black oak (*Quercus velutina*), bur oak (*Quercus macrocarpa*), chinquapin oak (*Quercus muehlenbergii*), northern pin oak (*Quercus ellipsoidalis*), northern red oak (*Quercus rubra*), overcup oak (*Quercus lyrata*), scarlet oak (*Quercus coccinea*), swamp white oak (*Quercus bicolor*), staghorn sumac (*Rhus typhina*), winged sumac (*Rhus copallina*), pecan (*Carya illinoensis*), persimmon (*Diospyros virginiana*), quaking aspen (*Populus tremuloides*), Norway spruce (*Picea abies*), Ohio buckeye (*Aesculus glabra*), sweetgum (*Liquidambar styraciflua*), tulip (*Liriodendron tulipifera*), white fir (*Abies concolor*), chokecherry (*Prunus virginiana*), eastern red cedar (*Juniperus virginiana*), hackberry (*Celtis occidentalis*), and Kentucky coffeetree (*Gymnocladus dioica*). Approximately 0.9 acre of immature trees and shrubs are included in “Do Not Disturb” areas and will not be impacted by construction. Approximately 6.6 acres of immature trees and shrubs are within the existing right-of-way and could be impacted by construction.

In a letter dated October 29, 2018 [2019] (Appendix D, pages 1511-1512), KIB indicated that they conducted a study during the summer 2019 of the 433 trees they planted along Davidson Street. This study utilized iTree Eco Model developed by the U.S. Forest Service, Northern Research Station. The assessment covered vegetation structure, function, and value, which can be representative of the other trees planted within the same timeframe in this area. As stated in the KIB letter, the study highlights health benefits of these trees based on the following statistics:

- Pollution Removal: 50.22 pounds/year, including O<sub>3</sub>, CO, NO<sub>2</sub>, SO<sub>2</sub>, and PM<sub>2.5</sub>
- Carbon Storage: 8.335 tons and Carbon Sequestration 1,393 pounds
- Oxygen Production: 1.857 tons/year
- Avoided Runoff: 1.714 thousand cubic feet/year

KIB indicated they have a high survival rate because they plant 1-2-inch caliper trees and water them for a minimum of three years. Replanting trees of this size and guaranteeing their survival would be both expensive and difficult to accomplish. KIB recommends the preservation of as many of these maturing trees as possible to retain these environmental benefits and lessen future costs of replacement. This would also allow increased investment into expanding the green infrastructure within the project area.

Regarding tree replacement, KIB recommends basing the number of replacement trees on total existing basal area. Basal area is the average amount of an area occupied by tree stems. It is defined as the total cross-sectional area of all stems in a stand measured at breast height and expressed as per unit of land area (typically square feet per acre).

The Rethink 65/70 Coalition, neighborhood associations, and members of the public have requested tree plantings within the interstate right-of-way. The Rethink 65/70 Coalition requested “reforestation of interior landscape areas to create the sensation of passing through a dense urban forest and providing year-round tree canopy and buffering for air pollutant, noise, and stormwater mitigation.”

Complete avoidance of all trees and shrubs within the right-of-way will not be possible due to the reconfiguration of the interchange, widening of the interstates in some areas, and the need for working room and access for the design-build team. Approximately 3.7 acres of trees and shrubs are marked as “Do Not Disturb” areas and will not be impacted by construction. The remaining 12.9 acres of trees and shrubs could be impacted during construction. Trees and shrubs will be replanted within the existing right-of-way in accordance with the North Split Aesthetic Design Guidelines, which are available in Appendix G, pages 214-326.

In their early coordination response dated November 17, 2017, IDNR DFW concurred that existing habitat features within the project area are likely low-quality features related to existing infrastructure (roadside ditches, medians, etc.) (Appendix C, pages 20-21). IDNR DFW recommended programs that may provide cost-share or technical assistance for the revegetation of roadsides, medians, and areas between the various interchange elements.

In their early coordination response dated October 24, 2017, USFWS indicated no objection to the project as currently proposed and also provided recommendations to avoid impacts to fish, wildlife and botanical resources (Appendix C, pages 16-17).

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An automated response was obtained from IDEM on October 19, 2017 (Appendix C, pages 28-31).  
 No written response was received from the USACE.

Four resource agency meetings have been held during the development of the project. At the first meeting, held on November 3, 2017, an introduction to the project was provided (Appendix C, pages 57-71). At the second meeting, held on May 22, 2018, the System-Level Analysis was discussed (Appendix C, pages 74-84). At the third meeting, held on October 17, 2018, the Alternatives Screening Report was discussed (Appendix C, pages 93-105). At the fourth meeting, held on April 30, 2020, public involvement activities, environmental resource impacts, public survey results, noise barrier recommendations, a Section 106 update, traffic impacts during construction, and the Aesthetic Design Guidelines were discussed (Appendix C, pages 106-132). Impacts to terrestrial habitat were discussed at the fourth resource agency meeting.

Applicable resource agency recommendations are included in *Section J – Environmental Commitments* of this document.

*If there are high incidences of animal movements observed in the project area, or if bridges and other areas appear to be the sole corridor for animal movement, consideration of utilizing wildlife crossings should be taken.*

**Karst**

Is the proposed project located within or adjacent to the potential Karst Area of Indiana?  
 Are karst features located within or adjacent to the footprint of the proposed project?  
 If yes, will the project impact any of these karst features?

Yes	No
	X
	X

Use the remarks box to identify any karst features within the project area. (Karst investigation must comply with the Karst MOU, dated October 13, 1993)

Remarks: Based on a desktop review, the project is located outside the designated karst region of Indiana as outlined in the October 13, 1993 Memorandum of Understanding (MOU). According to the topo map of the project area (Appendix B, page 2) and the RFI report (Appendix E, page 3), no karst features are identified within or adjacent to the project area. In the early coordination response, the Indiana Geological Survey (IGS) did not indicate that karst features exist in the project area (Appendix C, pages 32-33) The IGS indicated the project area has a moderate liquefaction potential, is within a floodway, has high potential for bedrock, sand, and gravel resources, and may have petroleum exploration wells. The features will not be affected because the project area is within the right-of-way of an existing interstate. Additionally, Pogues Run has been piped and there is no floodway within the project area. The response from IGS was communicated with the designer on November 24, 2019. No impacts are expected.

**Threatened or Endangered Species**

Within the known range of any federal species  
 Any critical habitat identified within project area  
 Federal species found in project area (based upon informal consultation)  
 State species found in project area (based upon consultation with IDNR)

	Impacts	
	Yes	No
Presence		
	X	X
	X	X

Is Section 7 formal consultation required for this action?

Yes	No
	X

Remarks: Based on a desktop review and the RFI report (Appendix E, pages 1-57), completed by HNTB on May 17, 2019, the IDNR Marion County Endangered, Threatened and Rare (ETR) Species List has been checked and is included in Appendix E, pages 55-57. The highlighted species on the list reflect the federal and state identified ETR species located within the county. According to the IDNR DFW early coordination response letter dated November 17, 2017 (Appendix C, pages 20-21), the Natural Heritage Program's Database has been checked and the state endangered Kirtland's snake (*Clonophis kirtlandii*) has been documented near the northeast end of the project area. According to the IDNR response letter, the Kirtland's snake records are in highly developed areas. One record is over 30 years old, and the other is in an area where the snakes were

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collected and relocated to avoid impacts from other development in the area. This species was not found during a recent site visit by the IDNR herpetologist; however, they could still be in the area. To minimize impacts to this species, IDNR recommends installing a silt fence around any construction areas where ground disturbance will occur. This is a firm commitment and is listed in *Section J - Environmental Commitments* at the end of this document.

Project information was submitted through the USFWS’s Information for Planning and Consultation (IPaC) portal, and an official species list was generated (Appendix C, pages 38-43). The project is within range of the federally endangered Indiana bat (*Myotis sodalis*) and the federally threatened northern long-eared bat (NLEB) (*Myotis septentrionalis*). No additional species were found within or adjacent to the project area other than the Indiana bat and NLEB.

The project qualifies for the Range-wide Programmatic Informal Consultation for the Indiana bat and northern long-eared bat (NLEB), dated May 2016 (revised February 2018), between FHWA, Federal Railroad Administration (FRA), Federal Transit Administration (FTA), and USFWS. An effect determination key was completed on September 16, 2019, and based on the responses provided, the project was found to have “no effect” on the Indiana bat and/or the NLEB (Appendix C, pages 44-50).

The RFI report was approved on May 21, 2019 (Appendix E, pages 1-57). Project information was submitted through the USFWS’s Information for Planning and Consultation (IPaC) portal, and an official species list was generated (Appendix C, pages 38-43). This project is located outside a High Potential Zone for the Rusty Patched Bumble Bee. Therefore, no impacts are expected.

This precludes the need for further consultation on this project as required under Section 7 of the Endangered Species Act, as amended. If new information on endangered species at the site becomes available, or if project plans are changed, USFWS will be contacted for consultation.

**SECTION B – OTHER RESOURCES**

	<b>Presence</b>	<b>Impacts</b>	
		<b>Yes</b>	<b>No</b>
<b>Drinking Water Resources</b>			
Wellhead Protection Area			
Public Water System(s)	X	X	
Residential Well(s)			
Source Water Protection Area(s)			
Sole Source Aquifer (SSA)			
If an SSA is present, answer the following:	<b>Yes</b>	<b>No</b>	
Is the Project in the St. Joseph Aquifer System?			
Is the FHWA/EPA SSA MOU Applicable?			
Initial Groundwater Assessment Required?			
Detailed Groundwater Assessment Required?			

Remarks: **Sole Source Aquifer**  
 The project is located in Marion County, which is not located within the area of the St. Joseph Sole Source Aquifer, the only legally designated sole source aquifer in the state of Indiana. Therefore, the FHWA/EPA Sole Source Aquifer Memorandum of Understanding (MOU) is not applicable to this project. Therefore, a detailed groundwater assessment is not needed and no impacts are expected.

**Wellhead Protection Area and Source Water**  
 In an early coordination letter dated October 24, 2017, IDEM stated the project is not located within a wellhead area (Appendix C, page 27). No impacts are expected.

**Water Wells**  
 The IDNR Water Well Record Database website (<https://www.in.gov/dnr/water/3595.htm>) was accessed on

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November 24, 2019 by HNTB. Water wells are mapped within the existing interstate right-of-way. In addition, groundwater monitoring wells were identified within the project limits during hazardous material sampling efforts. Groundwater monitoring wells were identified in the following locations: east of the interstates and north of 10<sup>th</sup> Street, west of the interstates near where Massachusetts Avenue stops, and east of the interstates between New York and Ohio streets. The features could be directly affected by construction activities or by construction equipment crossing over them.

If groundwater monitoring wells are encountered in the project area, they will be maintained in place if feasible. If they cannot be maintained, the design-build team must contact the INDOT Project Manager who will notify the INDOT Right-of-way Permits Group. The INDOT Right-of-way Permits Group will notify the permit holder that the well must be removed prior to construction. The permit holder is responsible for coordination with IDEM and the INDOT Right-of-way Permits Group for replacement or relocation of the well. If a property owner cannot be found in connection with the monitoring well, then well abandonment will be included in the project contract. All well abandonment activities must be completed by an Indiana Licensed Well Driller in accordance with IAC 312-13-10. Regardless of whether the well is abandoned by the design-build team or the property owner, a record of well abandonment, including the well driller's license number, must be provided to the INDOT Project Manager once the well has been abandoned.

### **Urban Area Boundary**

Based on a desktop review of the INDOT MS4 website (<https://entapps.indot.in.gov/MS4/>) by HNTB on November 24, 2019 and the RFI report; this project is located in an Urban Area Boundary (UAB). An early notification letter was sent on October 18, 2017, to the Indianapolis Department of Public Works (DPW) (Appendix C, page 7). The Marion County Stormwater Management District (MCSWMD) responded in a letter dated October 24, 2017 (Appendix C, page 35). The MCSWMD indicated if there is additional impervious area, the project must consider the downstream capacity of the existing storm sewer system, the project must comply with the City of Indianapolis Storm Water Design and Construction Manual including Chapter 700 for post-construction water quality requirements, and the project must include temporary erosion and sediment control measures during all phases of construction.

In their early coordination response letter dated November 20, 2017, USEPA recommended coordination with Indianapolis DPW and Citizens Energy Group regarding stormwater and noted the EA should describe locations of water bodies, streams, groundwater resources, wellhead protection areas, and impacts to water quality (Appendix C, pages 8-15). There are no streams within the project area. Drainage from the project area is eventually directed to Pogues Run and the White River. Both streams are impaired. Pogues Run is impaired for *E. coli* and an impaired biotic community. The White River is impaired for *E. coli* and polychlorinated biphenyls (PCBs). The project is not anticipated to affect the impairment status of Pogues Run or the White River.

The North Split Project will comply with the Indiana Design Manual regarding stormwater considerations. Stormwater detention, both within the interchange infield and in larger-sized pipes, will be used to avoid increased flows to existing stormwater systems. Coordination has occurred with City of Indianapolis regarding project drainage design.

### **Public Water System**

Based on a desktop review, a site visit on November 26, 2019 by HNTB, the aerial map of the project area (Appendix B, pages 4-16), and coordination with local utilities this project is located where there is a public water system. The public water system will be affected. Citizens Energy Group currently has a 6-inch water main on Davidson Street between Michigan Street and North Street. This line will be relocated and replaced with an 8-inch water main to avoid impacts from the project. A fire hydrant will be replaced as part of the relocation. In addition, a 6-inch water main on Ohio Street will be lowered to accommodate the project. As part of the utility coordination for the project, Citizens Energy Group provided information about the water main in a Work Plan dated November 1, 2019 (Appendix C, pages 51-56). Avoidance of these water mains is not practicable because all construction work is being completed within the existing right-of-way in this highly developed area. There are numerous utilities present within the existing right-of-way in this area and avoidance of all of them is not practicable.

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<b>Flood Plains</b>	<u>Presence</u>	<u>Impacts</u>	
		Yes	No
Longitudinal Encroachment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transverse Encroachment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Project located within a regulated floodplain	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Homes located in floodplain within 1000' up/downstream from project	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Discuss impacts according to classification system described in the "Procedural Manual for Preparing Environmental Studies"*

Remarks: The IDNR Indiana Floodway Information Portal website (<http://dnrmaps.dnr.in.gov/appsphp/fdms/>) was accessed on November 24, 2019 by HNTB. This project is not located in a regulatory floodplain as determined from approved IDNR floodplain maps (Appendix F, page 33). Therefore, it does not fall within the guidelines for the implementation of 23 CFR 650, 23 CFR 771, and 44 CFR. No impacts are expected.

<b>Farmland</b>	<u>Presence</u>	<u>Impacts</u>	
		Yes	No
Agricultural Lands	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prime Farmland (per NRCS)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Total Points (from Section VII of CPA-106/AD-1006\* \_\_\_\_\_  
*\*If 160 or greater, see CE Manual for guidance.*

*See CE Manual for guidance to determine which NRCS form is appropriate for your project.*

Remarks: Based on a desktop review, site visits on October 29-30, 2015; April 25-27, May 24, and October 3-5, 2016; October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by Parsons and HNTB, and the aerial map of the project area (Appendix B, pages 4-16), there is no land that meets the definition of farmland under the Farmland Protection Policy Act (FPPA) within or adjacent to the project area. The requirements of the FPPA do not apply to this project; therefore, no impacts are expected. An early coordination letter was sent on October 18, 2017, to Natural Resources Conservation Services (NRCS) (Appendix C, pages 1-6). The NRCS responded in a letter dated October 19, 2017, that the project will not cause a conversion of prime farmland (Appendix C, page 18).

**SECTION C – CULTURAL RESOURCES**

	<b>Category</b>	<b>Type</b>	<b>INDOT Approval Dates</b>	<b>N/A</b>
Minor Projects PA Clearance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Eligible and/or Listed  
Resource Present**

**Results of Research**

Archaeology	<input type="checkbox"/>
NRHP Buildings/Site(s)	<input checked="" type="checkbox"/>
NRHP District(s)	<input checked="" type="checkbox"/>
NRHP Bridge(s)	<input checked="" type="checkbox"/>

**Project Effect**

No Historic Properties Affected     No Adverse Effect     Adverse Effect

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**Documentation Prepared**

Documentation (mark all that apply)

	ES/FHWA Approval Date(s)	SHPO Approval Date(s)
Historic Properties Short Report		
Historic Property Report	X	Dec. 29, 2017 (HPR) Sept. 21, 2018 (Addendum)
Archaeological Records Check/ Review	X	Feb. 8, 2018 (HPR) Oct. 29, 2018 (Addendum)
Archaeological Phase Ia Survey Report	X	June 17, 2019 (Report) Nov. 7, 2019 (Addendum)
Archaeological Phase Ib Survey Report	X	July 18, 2019 (Report) Dec. 16, 2019 (Addendum)
Archaeological Phase II Investigation Report	X	June 17, 2019 (Report) Nov. 7, 2019 (Addendum)
Archaeological Phase III Data Recovery	X	July 18, 2019 (Report) Dec. 16, 2019 (Addendum)
APE, Eligibility and Effect Determination	X	Dec. 14, 2018
800.11 Documentation	X	January 25, 2019
	X	January 17, 2020
	X	January 17, 2020

**MOA Signature Dates** (List all signatories)

Memorandum of Agreement (MOA)	X	FHWA – May 27, 2020 SHPO – May 27, 2020 ACHP – May 29, 2020 INDOT – May 19, 2020 Benjamin Harrison Presidential Site – May 19, 2020 Keep Indianapolis Beautiful – May 20, 2020
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Describe all efforts to document cultural resources, including a detailed summary of the Section 106 process, using the categories outlined in the remarks box. The completion of the Section 106 process requires that a Legal Notice be published in local newspapers. Please indicate the publication date, name of paper(s) and the comment period deadline. Likewise include any further Section 106 work which must be completed at a later date, such as mitigation or deep trenching.

Remarks: INDOT, acting on behalf of FHWA, is required to comply with Section 106 of the National Historic Preservation Act of 1966 as amended (Section 106), and its implementing federal regulation, 36 CFR 800. Section 106 and 36 CFR 800 outline a process that requires FHWA and INDOT to evaluate the effects of undertakings on properties that are listed on or eligible for listing on the National Register of Historic Places (NRHP).

**Area of Potential Effect (APE)**

The original Area of Potential Effects (APE) for the North Split Project started as a 0.25-mile buffer around the entire project area, which was increased to a 0.5-mile buffer around the existing North Split interchange to account for increases in the height of ramps within the interchange. Subsequent to the completion of the Historic Property Report (HPR), an expanded APE was developed to take into account anticipated temporary truck traffic increases on city streets during construction of the North Split Project. The segments listed below are included in the expanded APE (Appendix D, pages 546-557).

- Fall Creek Parkway Segment, from 38<sup>th</sup> Street south to College Avenue
- College Avenue Segment, from Fall Creek Parkway south to original APE
- West Street Segment, from the I-65 interchange south to the I-70 interchange
- Missouri Street Segment, from West Street south to the I-70 interchange
- Pennsylvania Street Segment, south from original APE to Madison Avenue
- Madison Avenue Segment, from Pennsylvania Street to I-70 interchange
- St. Clair Street Segment, from original APE west to West Street
- Fort Wayne Avenue Segment, from original APE south to St. Clair Street
- East Street Segment, from original APE south to original APE
- Washington Street Segment, from Rural Street west to original APE
- Rural Street Segment, from the I-70 interchange south to Washington Street
- Massachusetts Avenue Segment, from original APE east to Rural Street

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### **Coordination with Consulting Parties**

There are 48 consulting parties for the North Split Project (Appendix D, pages 29-31). The Section 106 review periods and meetings for the project are listed below. Additional details, including a more detailed timeline of consultation, consulting party comments letters and emails, and responses to consulting party comments are included in Appendix D.

### **Early Coordination/Invitation to Section 106 Consultation**

Early coordination letters and Section 106 consulting party invitations were sent to the State Historic Preservation Officer (SHPO) and 37 potential consulting parties on September 19, 2017. INDOT provided the same notification to Tribes who have accepted consulting party status on the following day. The letter discussed the proposed project location, purpose and need, initial scope of work, and proposed APE; explained the Section 106 consultation process; and included an invitation to a consulting parties meeting on October 6, 2017 (Appendix D, pages 855-867). Consulting party meeting #1 was held on October 6, 2017, at the Indiana Historical Society. Ten consulting parties attended in person or via phone. The purpose of the meeting was to discuss the project, the APE, and next steps in the Section 106 consultation process. Attendees were encouraged to provide written comments (Appendix D, pages 655-679). Written comments were received from the Miami Tribe of Oklahoma, Indianapolis Historic Preservation Commission, Chatham Arch Neighborhood Association, Holy Cross Neighborhood Association, NESCO Land Use Committee, Old Northside Neighborhood Association, SHPO, and City of Indianapolis Department of Metropolitan Development (DMD) (Appendix D, pages 868-910).

### **Section 106 Update Memo #1 and Historic Property Report (HPR)**

Section 106 Update Memo #1 and the HPR were sent to the SHPO and consulting parties on January 8, 2018. INDOT provided the same notification to the Tribes on the same day. Update Memo #1 discussed the HPR and aboveground historic properties, upcoming archaeology report, traffic diversion and APE expansion methodology, updates to the project scope, responses to consulting party comments from the previous comment period. It also included an invitation to consulting party meeting #2 on January 26, 2018 (Appendix D, pages 912-972). Consulting party meeting #2 was held on January 26, 2018 at the Benjamin Harrison Presidential Site. Forty-four consulting parties and members of the public attended in person or via phone. The purpose of the meeting was primarily to discuss the results of the HPR, provide an update on the archaeology component of the project, and review the traffic diversion and APE expansion methodology. Attendees were encouraged to provide written comments (Appendix D, pages 681-713). Written comments were received from the North Square Neighborhood Association, Hendricks Commercial Properties, City of Indianapolis Department of Public Works (DPW), Keep Indianapolis Beautiful, Historic Urban Neighborhoods of Indianapolis, property owners, SHPO, Saint Joseph Historic Neighborhood Association, Chatham Arch Neighborhood Association, American Institute of Architects, Lockerbie Square Peoples Club, Fletcher Place Neighborhood Association, Martindale Brightwood Community Development Corporation, and Interstate Business Group (Appendix D, pages 973-1053).

### **System-Level Analysis Notification**

Consulting parties were notified of the availability of the System-Level Analysis on the project website via email on April 24, 2018. The System-Level Analysis was not a formal step in the North Split Section 106 consultation process. The System-Level Analysis investigated a range of concepts for the entire downtown Indianapolis interstate system. INDOT initiated the System-Level Analysis to assess the performance, cost, and impact of seven concepts for I-65 and I-70 through downtown Indianapolis. The analysis did not provide a final recommendation on the downtown interstate system, but the facts informed the process moving forward for the North Split interchange. Consulting parties were also invited to a consulting party meeting #3 to learn more about the System-Level Analysis (Appendix D, pages 1055-1056). Consulting party meeting #3 was held on May 21, 2018 at the Indiana State Museum. Twenty-one consulting parties attended in person or via phone. The purpose of the meeting was primarily to discuss the results of the System-Level Analysis. Review of the System-Level Analysis and this meeting were not formal steps in the North Split Section 106 consultation process (Appendix D, pages, 715-744). They are included in this timeline for reference. Attendees were encouraged to provide written comments (Appendix D, pages 1057-1109).

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*Section 106 Update Memo # 2, Alternatives Screening Report, and HPR Addendum*

Section 106 Update Memo #2, Alternatives Screening Report, and HPR Addendum were sent to the SHPO and consulting parties on September 28, 2018. Update Memo #2 discussed the availability of the Alternatives Screening Report, the expanded APE and historic properties, and responses to consulting party comments from the previous comment period. It included an invitation to a consulting parties meeting #4 on October 17, 2018 (Appendix D, pages 1111-1168). Consulting party meeting #4 was held on October 17, 2018, at the Indiana Historical Society. Twenty consulting parties attended in person or via phone. The purpose of the meeting was primarily to discuss the project purpose and need, alternatives screening, and historic properties identified within the expanded APE. Attendees were encouraged to provide written comments (Appendix D, pages 746-780). Written comments were received from the Indianapolis Historic Preservation Commission, Historic Urban Neighborhoods of Indianapolis, Benjamin Harrison Presidential Site, Keep Indianapolis Beautiful, American Institute of Architects, Windsor Park Neighborhood Association, Cottage Home Neighborhood Association, Lockerbie Square Peoples Club, Interstate Business Group, Indiana Landmarks, Chatham Arch Neighborhood Association, North Square Neighborhood Association, SHPO, Massachusetts Avenue Merchants Association, and Saint Joseph Historic Neighborhood Association (Appendix D, pages 1171-1345).

*Section 106 Update Memo # 3 (including Forecasted Permanent Traffic Changes)*

Section 106 Update Memo #3 was sent to the SHPO and consulting parties on March 20, 2019. Update Memo #3 discussed refinements to preliminary preferred Alternative 4c, forecasted permanent traffic changes and the APE, and responses to earlier consulting party comments (Appendix D, pages 1347-1417). Written comments were received from the SHPO (Appendix D, pages 1428-1429).

*Section 106 Update Memo # 4 and Phase Ia Archaeological Records Check and Survey Report*

Section 106 Update Memo #4 was sent to the SHPO and consulting parties on June 18, 2019. Update Memo #4 included a review of the Section 106 consultation history, and notification that an Effects Report was in process for aboveground historic properties. It also advised the Phase Ia Archaeological Records Check and Reconnaissance Survey report was available for the Tribes' review. INDOT provided the same notification to the Tribes the following day (Appendix D, pages 1432-1437). Written comments were received from the North Square Neighborhood Association and the SHPO (Appendix D, pages 1439-1443).

*Section 106 Update Memo #5 and Historic Property Assessment of Effects Report*

Section 106 Update Memo #5 and the Historic Property Assessment of Effects Report were sent to the SHPO and consulting parties on August 9, 2019. INDOT provided the same notification to the Tribes on the same date. Update Memo #5 discussed the Historic Property Assessment of Effects Report, slight changes to historic district and property boundary mapping, and responses to consulting party comments from the previous comment periods. It included an invitation to consulting party meeting #5 on August 29, 2019 (Appendix D, pages 1445-1455). Consulting party meeting #5 was held on August 29, 2019 at the Ivy Tech Culinary and Conference Center. Eight consulting parties attended in person or via phone. The meeting provided updates on the status of the Section 106 consultation process, provided an update on the archaeological surveys, discussed efforts to minimize effects to historic properties, discussed the methodology of the effects report, discussed the results of the assessment of effects, and introduced the consulting parties to the idea of mitigation of adverse effects and possible mitigation options. Attendees were encouraged to provide written comments (Appendix D, pages 782-817). Written comments were received from the Indianapolis Historic Preservation Commission, Old Northside Neighborhood Association, Benjamin Harrison Presidential Site, Keep Indianapolis Beautiful, Cottage Home Neighborhood Association, Lockerbie Square Peoples Club, Indiana Landmarks, National Trust for Historic Preservation, Chatham Arch Neighborhood Association, North Square Neighborhood Association, SHPO, Massachusetts Avenue Merchants Association, Saint Joseph Historic Neighborhood Association. The following members of the public also provided written comments: Roberta Avidor, Rethink 65/70 Coalition, Nancy Schaefer, and Strong Indy (Appendix D, pages 1456-1541).

*Section 106 Update Memo #6 and Traffic Noise Barrier Addendum to the Assessment of Effects Report*

Section 106 Update Memo #6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report were sent to the SHPO and consulting parties on October 11, 2019. INDOT provided the same notification to

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the Tribes on the same date. Update Memo #6 discussed the traffic noise analysis, Traffic Noise Barrier Addendum, consulting party comments and effect finding recommendations, and responses to consulting party comments from the previous comment period. It included an invitation to consulting parties meeting #6 on October 29, 2019 (Appendix D, pages 1543-1605). Consulting party meeting #6 was held on October 29, 2019 at the Ivy Tech Community College Culinary and Conference Center. Eight consulting parties attended in person or via phone. The purpose of the meeting was to review the Traffic Noise Analysis and effects to historic properties, review the responses to consulting parties comments on the Assessment of Effects Report and the Traffic Noise Barrier Addendum, and to begin discussing possible mitigation ideas. Attendees were encouraged to provide written comments (Appendix D, pages 819-851). Written comments were received from the Indianapolis Historic Preservation Commission, Historic Urban Neighborhoods of Indianapolis, Keep Indianapolis Beautiful, Windsor Park Neighborhood Association, Old Northside Neighborhood Association, Cottage Home Neighborhood Association, Interstate Business Group, Indiana Landmarks, National Trust for Historic Preservation, Chatham Arch Neighborhood Association, SHPO, Holy Cross Neighborhood Association, Luke Leising, and Saint Joseph Historic Neighborhood Association (Appendix D, pages 1606-1649).

### Section 106 Update Memo #7 and Addendum to Phase Ia Archaeology Report

Section 106 Update Memo #7 and the Phase Ia archaeology report addendum were sent to the SHPO and consulting parties on November 7, 2019. INDOT provided the same notification to the Tribes on the same date. Update Memo #7 discussed one additional noise barrier (NB3W) and its potential effect to historic properties (Appendix D, pages 1651-1662). Written comments were received from the SHPO (Appendix D, pages 1664-1672).

### Section 106 Update Memo #8 and Section 106 800.11(e) Finding/Document

Section 106 Update Memo #8 and the Section 106 800.11(e) finding/document were sent to the SHPO and consulting parties on December 19, 2019. INDOT provided the same notification to the Tribes on the same date. Update Memo #8 notified consulting parties of the availability of the Section 106 finding and 800.11(e) documentation, and discussed possible mitigation ideas (Appendix D, pages 453-480). Consulting party meeting #7 was held on January 16, 2020 at the Ivy Tech Community College Culinary and Conference Center. Thirteen consulting parties attended in person or via phone. The purpose of the meeting was to review the Section 106 800.11(e) documentation and effects to historic properties and discuss preliminary mitigation ideas. Attendees were encouraged to provide written comments (Appendix D, pages 435-450). Written comments were received from the Indianapolis Historic Preservation Commission, Historic Urban Neighborhoods of Indianapolis, Keep Indianapolis Beautiful, Massachusetts Avenue Merchants Association, Lockerbie Square Peoples Club, Indiana Landmarks, National Trust for Historic Preservation, Chatham Arch Neighborhood Association, SHPO, Holy Cross Neighborhood Association, and Saint Joseph Historic Neighborhood Association. The Rethink 65/70 Coalition provided public comments (Appendix D, pages 370-434).

### Section 106 Update Memo #9 (regarding minor design modifications)

Section 106 Update Memo #9 was sent to the SHPO and consulting parties on November 7, 2019. INDOT provided the same notification to the Tribes on the same date. Update Memo #9 discussed minor project design modifications. No changes to effect findings were recommended (Appendix D, pages 346-369). Written comments were received from the SHPO (Appendix D, pages 344-345).

### Section 106 Update Memo #10 and Draft MOA

Section 106 Update Memo #10 and the Draft MOA were sent to the SHPO and consulting parties on March 11, 2020. INDOT provided the same notification to the Tribes on the same date. Update Memo #10 notified consulting parties of the availability of the North Split Aesthetic Design Guidelines, responded to consulting party comments regarding preliminary mitigation ideas, and transmitted the draft MOA (Appendix D, pages 254-343). Consulting party meeting #8 was held virtually via the WebEx conferencing tool on March 23, 2020. Fifteen consulting parties attended. The purpose of the meeting was to review the Aesthetic Design Guidelines, discuss additional mitigation items added to the MOA, and discuss specific consulting party comments regarding mitigation ideas. Attendees were encouraged to provide written comments (Appendix D, pages 230-253). Written comments were received from the Advisory Council on Historic Preservation,

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Historic Urban Neighborhoods of Indianapolis, Benjamin Harrison Presidential Site, Massachusetts Avenue Merchants Association, Lockerbie Square Peoples Club, National Trust for Historic Preservation, Fletcher Place Neighborhood Association, Martindale Brightwood Community Development Corporation, Old Northside Neighborhood Association, Chatham Arch Neighborhood Association, SHPO, Cottage Home Neighborhood Association, Holy Cross Neighborhood Association, and Saint Joseph Historic Neighborhood Association. The Rethink 65/70 Coalition provided public comments (Appendix D, pages 126-229).

Section 106 Update Memo #11 and Addendum #2 to Phase Ia Archaeology Report

Section 106 Update Memo #11 and the Phase Ia archaeology report addendum #2 were sent to the SHPO and consulting parties on April 16, 2020. INDOT provided the same notification to the Tribes on April 17, 2020. Update Memo #11 discussed the results of Phase Ia archaeology report addendum #2 (Appendix D, pages 119-125). Written comments were received from the SHPO (Appendix D, pages 113-115).

Section 106 Update Memo #12 and Final MOA for Signatures

A draft Final MOA in tracked changes was sent to consulting parties for their information on May 4, 2020. INDOT provided the same notification to the Tribes on the same day (Appendix D, pages 111-112). Section 106 Update Memo #12 and the Final MOA were sent to the SHPO and consulting parties for signatures on May 18, 2020. INDOT provided the same notification to the Tribes on May 19, 2020. Update Memo #12 provided responses to consulting party comments on the Draft MOA (Appendix D, pages 69-103).

Archaeology

A Phase 1b Archaeology Work Plan (Coughlin, August 25, 2017) for excavation within the interchange infield was completed by a Qualified Professional (QP) at ASC Group who satisfies the *Secretary of the Interior's Professional Qualification Standards* and was approved by INDOT on August 28, 2017. The Phase 1b Archaeology Work Plan was hand delivered to the SHPO on August 28, 2017. The SHPO approved it in a letter dated August 29, 2017 (Appendix D, pages 853-854).

A Phase 1b archaeological reconnaissance survey was conducted for the North Split interchange infield. The Phase 1b Archaeological Records Check and Reconnaissance Survey Report was completed by a QP at ASC Group on December 3, 2018 (Coughlin and Miller, December 3, 2019) (Appendix D, pages 628-631). The Phase 1b archaeology survey found one site within the project area, which was recommended not eligible for the NRHP. No further work was recommended. INDOT approved the Phase 1b report on December 14, 2018 and it was sent to the SHPO on that day (Appendix D, page 1341). The SHPO concurred with the findings of the report in a letter dated January 25, 2019 (Appendix D, pages 1342-1343).

A Phase 1a archaeological reconnaissance survey was conducted for portions of the North Split project area that might not already be disturbed based on a review of aerial photography and the USGS topographic map. The Phase 1a Archaeological Records Check and Reconnaissance Survey Report was completed by a QP at ASC Group on June 13, 2019 (Miller and Schwarz, June 13, 2019) (Appendix D, pages 632-634). The Phase 1a archaeology survey did not identify any archaeological sites and no further work was recommended. INDOT approved the Phase 1a report on June 17, 2019 and it was sent to the SHPO on that day (Appendix D, page 1431). The SHPO concurred with the findings of the report in a letter dated July 18, 2019 (Appendix D, pages 1441-1443).

An Addendum Phase 1a Archaeological Records Check and Reconnaissance Survey Report was completed by a QP at ASC Group on November 6, 2019 (Schwarz, November 6, 2019), due to small additions to the North Split project area (Appendix D, pages 646-648). The Phase 1a archaeology survey found one site within the project area, which was recommended not eligible for the NRHP. No further work was recommended. INDOT approved the Phase 1a addendum report on November 7, 2019 and it was sent to the SHPO on that day (Appendix D, pages 1651-1655). In a letter dated December 9, 2019, the SHPO requested the report be revised to include additional information about the archaeology site (Appendix D, pages 1664-1666). The Phase 1a addendum report was revised and resubmitted to the SHPO on December 13, 2019 (Appendix D, page 1669). The SHPO concurred with the results in a letter dated December 16, 2019 and stated "...we concur with the opinion of the archaeologist, as expressed in the archaeological report, that the portions of archaeological site 12-Ma-1062 that lie within Area 8 of the proposed project area do not appear to warrant additional archaeological investigations. However, the portions of archaeological site 12-Ma-1062

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that lie outside the proposed project area should be clearly marked so that they are avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the DHPA for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archeology and Historic Preservation" (48 F.R. 44716)" (Appendix D, pages 1670-1672). This is included as a firm commitment in *Section J – Environmental Commitments* of this environmental document.

An Addendum Phase 1a Archaeological Records Check and Reconnaissance Survey Report #2 was completed by a QP at ASC Group on April 15, 2020 (Schwarz, April 15, 2020) due to small additions to the North Split project area (Appendix D, pages 122-123). The Phase 1a archaeology survey did not identify any archaeological sites and no further work was recommended. INDOT approved the Phase 1a addendum report on April 16, 2020, and it was sent to the SHPO on that day (Appendix D, pages 119-121). The SHPO concurred with the findings of the report in a letter dated May 4, 2020 (Appendix D, pages 113-115).

### **Historic Properties**

There are 51 historic resources listed in or eligible for the NRHP in the APE (Appendix D, pages 485-488). Of these, 37 historic resources are listed in the NRHP, two are National Historic Landmarks (NHLs), and 12 have been determined eligible for the NRHP through the Section 106 consultation for this undertaking.

An HPR was completed by a QP at ASC Group (Konicki and Terpstra, December 29, 2017) and approved by INDOT on December 29, 2017 (Appendix D, pages 618-623). It was sent to the SHPO and consulting parties on January 8, 2018 (Appendix D, pages 912-917). The SHPO concurred with the findings of the report in a letter dated February 8, 2018 (Appendix D, pages 1004-1006).

An Addendum to the HPR was completed by a QP at ASC Group for the expanded APE (Konicki, September 19, 2018) and approved by INDOT on September 21, 2018 (Appendix D, pages 624-627). It was sent to the SHPO and consulting parties on September 28, 2018 (Appendix D, pages 1111-1115). The SHPO concurred with the findings of the report in a letter dated October 29, 2018 (Appendix D, pages 1191-1193).

### **Documentation, Findings**

The project will have an Adverse Effect on the following historic properties (Appendix D, page 491):

#### **Old Northside Historic District/Morris Butler House**

The Old Northside Historic District and the Morris-Butler House are located immediately adjacent to the existing right-of-way line of the interstate west of the North Split and north of I-65. The Morris-Butler House is individually listed in the NRHP and a contributing property to the Old Northside Historic District.

As a result of the undertaking, the edge of pavement of the Pennsylvania Street exit ramp will be moved a maximum of 26 feet closer to the historic district boundary, vegetation will be removed from within the right-of-way. In order to widen the exit ramp just south of the Morris-Butler House, the present slope will be converted to a retaining wall to eliminate the need for new right-of-way to accommodate fill slopes. This retaining wall will be within the existing right-of-way of I-65 but it will be approximately 21 to 25 feet closer to the property than the existing pavement on the north side of I-65. The retaining wall will be approximately 10 to 16 feet tall.

The proposed elevation of the road at this location will be approximately six to seven feet taller than the existing road, with a 4-foot Jersey barrier on top of it. The interstate will increase in height along the portion adjacent to the Old Northside Historic District, beginning with the bridge over Alabama Street, where there is no increase, to a 14-foot increase of the I-65 northbound bridge over College Avenue. The greatest height increases will be farther from the historic district boundary because the existing bridge over College Avenue, which is for the I-70 exit to Pennsylvania Street and is closest to the district, will be removed. Overhead utility lines that cross over the interstate will likely need to be raised to add vertical clearance over I-65; this may require relocation of the utility lines and/or replacement of wood poles with steel poles. The existing 110-foot tall steel utility pole located east of the Morris-Butler House may require relocation.

Permanent traffic changes are anticipated to be minor near and within this district. The largest permanent increase in total vehicles in the peak hour is 79 on 16<sup>th</sup> Street, which equates to a density (total volume rate

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change) increase of 0.3 vehicle/minute/lane. Temporary increases in heavy trucks during construction are anticipated to range from zero to nine heavy trucks on 16<sup>th</sup> Street in the peak hours near this property. There are no contributing features, such as brick streets or stone curbs on the streets with anticipated temporary heavy truck increases within or near the district. Adverse effects are not anticipated from temporary or permanent traffic increases.

The increased height of the interstate, removal of screening vegetation within the existing right-of-way that currently partially blocks views of the interstate, closer edge of pavement, and installation of a retaining wall will affect the characteristics that qualify the Old Northside Historic District and the Morris-Butler House for the NRHP in a manner that would diminish their integrity. A noise barrier was considered adjacent to the Old Northside Historic District and Morris-Butler House, but as described later in this document in *Section F – Noise*, the barrier is not being constructed. Not constructing this noise barrier is a minimization measure under Section 106. Although the interstate is an already existing intrusion on the integrity of the Old Northside Historic District, the project activities described above will make the intrusion more visible from within the district.

As a result, the undertaking will have an Adverse Effect on the Old Northside Historic District and the Morris-Butler House.

### Saint Joseph Neighborhood Historic District

The Saint Joseph Neighborhood Historic District is six feet away from proposed sidewalk improvements along Delaware Street near the existing entrance ramp to the interstate. The proposed edge of pavement of the interstate will be located between approximately eight and 20 feet closer to the historic district. The interstate pavement will be 20 feet closer at the district's eastern edge. The proposed interstate edge of pavement will be approximately 55 feet from the historic district boundary at that location.

As a result of the undertaking, the Delaware Street entrance ramp to the interstate will be as much as four feet taller than the existing ramp at the Central Avenue bridge. Additionally, the Central Avenue bridge will be replaced. The present sideslope will be converted to a retaining wall, vegetation could be removed from within the right-of-way. Overhead utility lines that cross over the interstate will likely need to be raised to add vertical clearance over I-65; this may require relocation of the utility lines and/or replacement of wood poles with steel poles. Adverse effects are not anticipated from temporary or permanent traffic increases.

The interstate edge of pavement will be closer to the district and this increased proximity, together with the combined height of the retaining wall, results in a visual change from existing conditions. A noise barrier was considered adjacent to the Saint Joseph Neighborhood Historic District, but as described below in *Section F – Noise*, the barrier is not being constructed. Not constructing this noise barrier is a minimization measure under Section 106. Although the interstate is an already existing intrusion on the integrity of the Saint Joseph Neighborhood Historic District, the increased proximity and height of the interstate will make the interstate appear to be a more pronounced intrusion for observers within the district. As a result, the proposed undertaking will have an impact on the characteristics that qualify the Saint Joseph Neighborhood Historic District for the NRHP in a manner that will diminish its integrity.

Therefore, the undertaking will have an Adverse Effect on the historic district.

### Chatham-Arch Historic District

The Chatham-Arch Historic District is approximately 67 feet from the proposed edge of pavement of the interstate at the historic district's north end. As part of the undertaking, the I-65 southbound ramp to I-70 eastbound will be reconstructed. The reconstruction will move the edge of pavement as much as 12 feet closer to the historic district, and the new ramp will be as much as approximately 22 feet taller than the existing road, supported in part by a new retaining wall from east of Alabama Street to the interchange. The reconstruction also could remove existing vegetation within the right-of-way of the interstate. The I-65/I-70 bridges over 10<sup>th</sup> Street and St. Clair Street will be replaced, with the new bridges four to nine feet taller than the existing bridges, but without a significant change in location or length. Overhead utility lines along the north side of 10<sup>th</sup> Street will need to be raised to add vertical clearance over I-65. This may require relocation of the utility lines. Adverse effects are not anticipated from temporary or permanent traffic increases.

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The proposed undertaking will result in impacts to the district's setting due to the closer distance between the undertaking and the historic district and the increased height of the bridges and the interstate. A noise barrier was considered adjacent to the Chatham-Arch Historic District, but as described later in this document in *Section F – Noise*, the barrier is not being constructed. Not constructing this noise barrier is a minimization measure under Section 106. The interstate is an already existing intrusion on the integrity of the Chatham-Arch Historic District, but the district's increased proximity to I-65 following construction and the increased height of the bridges and the interstate will make the new interstate a more pronounced intrusion from within the district. Project activities will affect the characteristics that qualify the Chatham-Arch Historic District for listing in the NRHP in a manner that will diminish the district's integrity.

As a result, the undertaking will have an Adverse Effect on the historic district.

### Massachusetts Avenue Commercial Historic District (if Noise Barrier 7 is constructed)

The Massachusetts Avenue Commercial Historic District is 67 feet from the proposed edge of pavement of the interstate at its closest point. The proposed edge of pavement of the interstate will not be closer to the district boundary than the existing edge of pavement of the interstate. The I-65/I-70 bridges over 10<sup>th</sup> Street will be replaced with the closest new bridge over 10<sup>th</sup> Street approximately four feet taller than the existing bridge and shifted to the east between 70 feet at the north end to approximately 15 feet at the south end. In the vicinity of Massachusetts Avenue, the proposed interstate will range from two to four feet higher than the existing interstate. Overhead utility lines that cross over the interstate will need to be raised to add vertical clearance over I-65. This may require relocation of the utility lines and/or replacement of wood poles with steel poles. Adverse effects are not anticipated from temporary or permanent traffic increases.

The maximum increase in noise for the Massachusetts Avenue Commercial Historic District is predicted to be 3.7 dB(A). This is a busy, commercial district and noise would not be unexpected there. Because the change in noise levels would be just at the threshold of human perception and within a busy commercial area, the integrity of the historic resources would not have the potential to be diminished by the project.

The proposed undertaking will result in minor impacts to the district's setting due to the increased height of the I-65 SB to I-70 ramp, as well as the bridges over 10<sup>th</sup> and St. Clair streets. However, the interstate is an already existing intrusion on the integrity of the Massachusetts Avenue Commercial Historic District and the project activities described above will not make the intrusion more visible from within the district because the scale of the height difference will be minimal. As a result, these project activities will not have an impact on the characteristics that qualify the Massachusetts Avenue Commercial Historic District for the NRHP in a manner that would diminish its integrity, and the undertaking will have No Adverse Effect on the historic district. A noise barrier was considered adjacent to the Massachusetts Avenue Commercial Historic District, but as described later in this document in *Section F – Noise*, the barrier is not being constructed. Not constructing this noise barrier is an avoidance measure under Section 106. Constructing the noise barrier would have resulted in an Adverse Effect to the historic district.

### Lockerbie Square Historic District (if Noise Barrier 7 is constructed)

The Lockerbie Square Historic District is approximately 44 feet from the proposed edge of pavement at the Michigan Street exit ramp (north of Michigan Street) at its closest point. In the area where the interstate is nearest to the historic district, the interstate edge of pavement will not be any closer to the district than it currently is now. Within the vicinity of the historic district, bridges over Michigan, Vermont, and New York streets will be replaced with taller bridges.

Minor traffic changes are anticipated along Michigan Street, which borders the northern edge of the historic district. The traffic analysis showed a density (total volume rate change) increase of 3.1 vehicles/minute/lane during the AM peak hour for Michigan Street. The increase in traffic may be perceptible during the AM peak period, but the forecasted traffic is still anticipated to be under capacity for Michigan Street. The change in traffic does not rise to a level that would diminish the district's historic integrity. Adverse effects are not anticipated from temporary or permanent traffic increases.

The project activities, including the distance between bridges and the historic district and the minimal height

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increases of the interstate east of the district, will make the intrusion only slightly more visible from within the district. As a result, these project activities will not have an impact on the characteristics that qualify the Lockerbie Square Historic District for the NRHP in a manner that would diminish its integrity, and the undertaking will have No Adverse Effect on the historic district. A noise barrier was considered adjacent to the Lockerbie Square Historic District. As described later in this document in *Section F – Noise*, the barrier is not being constructed. Not constructing this noise barrier is an avoidance measure under Section 106. Constructing the noise barrier would have resulted in an Adverse Effect to the historic district.

The project will have No Adverse Effect on 23 historic properties and No Effect on 22 properties (Appendix D, pages 489-490).

The Section 106 Adverse Effect finding was signed by FHWA, on December 19, 2019 (Appendix D, page 491). The 800.11(e) document and finding were sent to consulting parties, including SHPO, on December 19, 2019 (Appendix D, pages 453-459). The SHPO concurred with the Section 106 Adverse Effect finding in a letter dated January 17, 2020 (Appendix D, pages 370-373).

**Memorandum of Agreement**

A Memorandum of Agreement (MOA) was developed between the FHWA, SHPO, and the Advisory Council on Historic Preservation (ACHP) to mitigate for the Adverse Effects on the Old Northside Historic District/Morris Butler House, Saint Joseph Neighborhood Historic District, Chatham-Arch Historic District, Massachusetts Avenue Commercial Historic District, and the Lockerbie Square Historic District. The draft MOA was sent to consulting parties, including the SHPO, on March 11, 2020. The MOA was revised per consulting party comments and a tracked changes version was sent to them so they could see the revisions on May 4, 2020. The final MOA was sent for signatures on May 18, 2020 (Appendix D, pages 69-71). The final MOA was executed on May 29, 2020 (Appendix D, pages 1-62). The mitigation stipulations of the MOA are listed in *Section J – Environmental Commitments* at the end of this document.

**Public Involvement**

To meet the public involvement requirements of Section 106, a legal notice of FHWA’s finding of Adverse Effect was published in the *Indianapolis Star* on December 24, 2019 offering the public an opportunity to submit comment pursuant to 36 CFR 800.2(d), 800.3(e), and 800.6(a)(4) (Appendix D, pages 451-452). The public comment period closed 30 days later on January 24, 2020. One public comment letter from the Rethink 65/70 Coalition was received (Appendix D, pages 414-429). Responses to the comments in this letter and other consulting party comments regarding the Adverse Effect finding and preliminary Section 106 mitigation ideas are in Appendix D, pages 266-299.

This completes the Section 106 process and the responsibilities of the FHWA under Section 106 have been fulfilled.

**SECTION D – SECTION 4(f) RESOURCES/ SECTION 6(f) RESOURCES**

Section 4(f) Involvement (mark all that apply)

**Parks & Other Recreational Land**

- Publicly owned park
- Publicly owned recreation area
- Other (school, state/national forest, bikeway, etc.)

**Presence**

X

**Use**

Yes	No
X	

**Evaluations Prepared**

- Programmatic Section 4(f)\*
- “De minimis” Impact\*
- Individual Section 4(f)

X

**FHWA Approval date**

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<b>Wildlife &amp; Waterfowl Refuges</b>	<u>Presence</u>	<u>Use</u>	
		Yes	No
National Wildlife Refuge	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
National Natural Landmark	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
State Wildlife Area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
State Nature Preserve	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<u>Evaluations Prepared</u>	<u>FHWA Approval date</u>
	Programmatic Section 4(f)* "De minimis" Impact* Individual Section 4(f)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

<b>Historic Properties</b>	<u>Presence</u>	<u>Use</u>	
		Yes	No
Sites eligible and/or listed on the NRHP	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<u>Evaluations Prepared</u>	<u>FHWA Approval date</u>
	Programmatic Section 4(f)* "De minimis" Impact* Individual Section 4(f)	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>

*\*FHWA approval of the environmental document also serves as approval of any Section 4f Programmatic and/or De minimis evaluation(s) discussed below. Discuss Programmatic Section 4(f) and "de minimis" Section 4(f) impacts in the remarks box below. Individual Section 4(f) documentation must be separate Draft and Final documents. For further discussions on Programmatic, "de minimis" and Individual Section 4(f) evaluations please refer to the "Procedural Manual for the Preparation of Environmental Studies". Discuss proposed alternatives that satisfy the requirements of Section 4(f).*

Remarks: Section 4(f) of the U.S. Department of Transportation Act of 1966 prohibits the use of certain public and historic lands for federally funded transportation facilities unless there is no feasible and prudent alternative. The law applies to significant publicly owned parks, recreation areas, wildlife/waterfowl refuges, and NRHP eligible or listed historic properties regardless of ownership. Lands subject to this law are considered Section 4(f) resources.

**Historic Section 4(f) Resources**

There are 51 historic resources listed in or eligible for the NRHP in the APE (Appendix D, pages 485-488). Of these, 37 historic resources are listed in the NRHP, 2 are NHLs, and 12 have been determined eligible for the NRHP through the Section 106 consultation for this undertaking.

There are 12 historic Section 4(f) resources located adjacent to the project area: Old Northside Historic District, Benjamin Harrison Home/Presidential Site, Morris-Butler House, Calvin Fletcher House, Wyndham, Saint Joseph Neighborhood Historic District, Chatham-Arch Historic District, Massachusetts Avenue Commercial Historic District, Lockerbie Square Historic District, Holy Cross/Westminster Historic District, Cole Motor Car Company, and John Hope School No 26. Through consultation with SHPO, it was determined that the project will have an Adverse Effect on six of those resources: Old Northside Historic District/Morris Butler House, Saint Joseph Neighborhood Historic District, Chatham-Arch Historic District, Massachusetts Avenue Commercial Historic District, and Lockerbie Square Historic District. Adverse effects to the Massachusetts Avenue Commercial Historic District and Lockerbie Square Historic District occurred only if Noise Barrier (NB) 7 was constructed. It has since been determined NB7 will not be constructed.

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No right-of-way will be acquired from any historic Section 4(f) resources, and access to all historic properties will be maintained throughout construction. Impacts of the project were evaluated for potential constructive use of historic resources. Constructive use involves no actual physical use of the Section 4(f) property via permanent incorporation of land or a temporary occupancy of land into a transportation facility. A constructive use occurs when the proximity impacts of a proposed project adjacent to, or nearby, a Section 4(f) property result in substantial impairment to the property's activities, features, or attributes that qualify the property for protection under Section 4(f). After considering factors such as noise impacts, increased traffic in surrounding areas during construction, and visual/setting impacts to the historic properties, it was determined that the project will not cause a constructive use of any historic 4(f) resources.

As part of the Section 106 evaluation for this project, FHWA has determined that this undertaking will not convert property from any Section 4(f) historic properties to a transportation use. In addition, the proximity impacts to adjacent historic properties will not result in substantial impairment to the properties' activities, features, or attributes that qualify the properties for protection under Section 4(f). Therefore, no Section 4(f) evaluation is required for the above-listed historic properties (Appendix D, page 491). The SHPO concurred with this determination on January 17, 2020 (Appendix D, pages 370-373).

### **Recreational 4(f) Resources**

Based on a desktop review, site visits on October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by HNTB, the aerial map of the project area (Appendix B, pages 4-16), the City of Indianapolis Indy Parks and Recreation web site, the Indy Greenways web site, and the RFI report (Appendix E, pages 2-3), there are 46 potential recreational Section 4(f) resources located within 0.5 mile of the project. Four recreational Section 4(f) resources are located within or adjacent to the project area. All four are trails.

### **Schools**

Playgrounds and other recreational areas within school properties can sometimes be considered Section 4(f) resources when certain criteria are met. None of the schools that were identified within the 0.5-mile search radius are located within the project area. Indiana Non-Public Education Association was identified in the RFI as a school adjacent to the project area. However, it is an administrative building and not a public school. It is therefore not a Section 4(f) resource. The Oaks Academy is a publicly owned, but privately-operated, school adjacent to the project area. Because it is publicly owned, it is subject to Section 4(f). No school property will be altered or incorporated into the transportation project. No constructive use of the school property will occur. The Legacy Learning Center is a privately-owned school adjacent to the project area. Because it is a private school, it is not a Section 4(f) resource. No further Section 4(f) analysis of school properties is necessary.

### **Parks**

There is one park located adjacent to the project area. The Frank and Judy O'Bannon Old Northside Soccer Park is an INDOT-owned parcel that is managed by the Indianapolis Parks and Recreation Department. No other parks are located within or directly adjacent to the project area. A portion of the Old Northside Trail will be reconstructed and widened within the Frank and Judy O'Bannon Old Northside Soccer Park to be a detour for temporary construction impacts to the Monon Trail (described in the Monon Trail section below). A letter was sent to the Indianapolis Department of Parks and Recreation on May 4, 2020, requesting concurrence that the proposed project will not adversely affect the activities or attributes but will enhance the features of the Old Northside Trail and Frank and Judy O'Bannon Old Northside Soccer Park (Appendix M, pages 45-46). The Indianapolis Department of Parks and Recreation agreed with this assessment and signed the letter on May 4, 2020 (Appendix M, page 46).

Access to all parks in the vicinity of the project will be maintained at all times during construction. No constructive use of any park properties will occur. No further Section 4(f) analysis of park properties is necessary.

### **Trails**

Four trails are located within or adjacent to the project area: Old Northside Trail (within the Frank and Judy O'Bannon Old Northside Soccer Park and discussed above), Indianapolis Cultural Trail, Pogues Run Trail,

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and the Monon Trail. The Principal Park Planner and Greenways Manager within the City of Indianapolis Department of Public Works is the Official with Jurisdiction for the three trails not within the Frank and Judy O'Bannon Old Northside Soccer Park. For public recreation areas, the official with jurisdiction is the official of an agency or agencies that own and/or administer the property in question and who are empowered to represent the agency on matters related to the property.

Pedestrian and bicycle connectivity for trails and sidewalks under interstate bridges will be addressed in accordance with the Indiana Manual on Uniform Traffic Control Devices which requires the following: adequate pedestrian access shall be provided, temporary pedestrian facilities shall meet the applicable requirements of the ADA, access to transit stops should be maintained, the width of the existing pedestrian facility should be provided for the temporary facility if practical, construction materials and features should not intrude into the usable width of the sidewalk, and any blocked routes should be signed in advance to alert users of closures and detour routes.

### Indianapolis Cultural Trail (Not a Section 4(f) Resource within Project Area)

The Indianapolis Cultural Trail (Cultural Trail) is a multi-use path located adjacent to the North Split Project area. The Cultural Trail is publicly owned and open to the public, and is considered a Section 4(f) resource. It begins 50 feet west of the project area (west of I-65 at the corner of 10<sup>th</sup> and Bellefontaine Street) and extends south toward the downtown area. The trail will remain open during construction, and access to the trail will not be impacted. No right-of-way will be acquired from the trail, and no part of the trail will be converted to a transportation use.

The pedestrian connection from the Cultural Trail west of the interstate, along 10<sup>th</sup> Street and under the interstate bridges east to the Monon Trail, is known as the Payne Connection. The Payne Connection is located along 10<sup>th</sup> Street under I-65/I-70 south of the North Split interchange. It is not considered a Section 4(f) resource. The Local Public Agency Project Coordination Contract between the INDOT and the City of Indianapolis dated June 23, 2008, excludes this pedestrian connection from the Cultural Trail to the Monon Trail along 10<sup>th</sup> Street from Section 4(f) protection (Appendix M, page 23). No further Section 4(f) evaluation of this pedestrian connection or the Cultural Trail is required.

The Payne Connection will be closed during construction of the new interstate bridges over 10<sup>th</sup> Street. Although a formal detour of the Payne Connection will not be provided, pedestrian and bicycle connectivity will be addressed in accordance with the Indiana Manual on Uniform Traffic Control Devices described in the Trails section above. The public art sculptures, lanterns, and signs that are currently located along the Payne Connection will be removed and stored during construction. They will be reinstalled once the interstate bridges have been constructed.

### Pogues Run Trail (Section 4(f) Temporary Occupancy)

Pogues Run Trail is a multi-use path connecting the Monon Trail east to Spades Park along 10<sup>th</sup> Street and Brookside Avenue. It is considered a Section 4(f) resource because it is publicly owned and open to the public. The trail ends on 10<sup>th</sup> Street at the Monon Trail, approximately 75 feet east of I-65/I-70. Approximately 90 feet of the Pogues Run Trail east of the Monon Trail is within the project limits. No right-of-way will be acquired from the trail, and no part of the trail will be converted to a transportation use. When 10<sup>th</sup> Street is temporarily closed during project construction, the portion of Pogues Run Trail east of the Monon Trail along 10<sup>th</sup> Street may also be closed. The 90-foot section of trail within the project limits could be closed for several months during the two-year construction project.

Because a 90-foot section of the Pogues Run Trail may be temporarily closed during project construction, it is being evaluated for Section 4(f) temporary occupancy. Under 23 CFR 774.13(d), a temporary occupancy of protected land for a construction project will not constitute a Section 4(f) use when all of the conditions listed below are satisfied:

1. Duration must be temporary, i.e., less than the time needed for construction of the project, and there should be no change in ownership of the land;
2. Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;

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3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
4. The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
5. There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

For the proposed North Split Project, closure of a section of the Pogues Run Trail will be temporary and less than the time needed for construction of the project. There will be no permanent alterations or adverse physical impacts to the trail, and it will be re-opened in a condition which is as good as that which existed prior to the project.

### Monon Trail (Section 4(f) De Minimis Use)

As a publicly owned multi-use path that is open to the public, the Monon Trail is considered to be a Section 4(f) resource. The trail travels beneath several interstate bridges within the interchange. No right-of-way will be acquired from the trail; however, temporary closure of the trail will be necessary during the construction of the project. The trail is expected to be closed intermittently for up to two years. It will also be reconstructed and widened to (from 10 feet to 14 feet) through the interchange. Because of the length of time that the Monon Trail will be closed, this would not be considered a temporary occupancy under Section 4(f), and a *de minimis* impact determination is proposed. A *de minimis* impact is one that, after taking into account any measure to minimize harm (such as avoidance, minimization, mitigation or enhancement measures), the project will not adversely affect the activities, features, or attributes qualifying a park, recreation area, or refuge for protection under Section 4(f).

MOT for the project will require that a pedestrian/bicycle detour be available when the trail is closed. The proposed detour will involve widening and enhancing a portion of the existing Old Northside Trail, which is located on an INDOT-owned parcel that is managed by the Indianapolis Parks and Recreation Department as the Frank and Judy O'Bannon Old Northside Soccer Park. The existing Old Northside Trail is approximately five feet wide and will require widening to 12 feet. The 17-acre public park includes a sports complex and the 0.7-mile paved Old Northside Trail that provides access to the Monon Trail. Access to the park will be maintained at all times during construction.

The detour will begin where the Monon Trail connects to the Old Northside Trail, along the south edge of the park. The detour will be 12 feet wide and will follow the Old Northside Trail for approximately 870 feet, then it will require construction of a trail that will continue west/southwest for approximately 600 feet within the interchange right-of-way and join College Avenue. The existing sidewalk along College Avenue will be reconstructed to a 12-foot multi-use path along the east side of College Avenue. Approximately 200 feet north of the intersection of College Avenue and 11<sup>th</sup> Street, a 12-foot multi-use path will be constructed within INDOT right-of-way east of College Avenue to connect to 10<sup>th</sup> Street and the Cultural Trail. The entire detour route will be constructed within existing INDOT or City right-of-way and will be compliant with the ADA (Appendix M, page 44).

A flagger may be used at times for the Monon Trail or the portion of the path along College Avenue if construction equipment is required to access the interchange area. The Monon Trail or the detour described above will be used to maintain bicycle and pedestrian traffic during construction. If for some reason during construction, closure of both the Monon Trail and the detour described above are required, the design-build team may provide a short-term temporary detour for bicyclists and pedestrians of no more than three consecutive days. A short-term detour can only be used two times per year and must have written approval from INDOT and the City of Indianapolis.

### Coordination with Official with Jurisdiction and Public Notice

A meeting was held on December 2, 2019, with representatives from Indy Parks and Recreation, Indy Greenways, and Indianapolis DPW. The purpose of the meeting was to discuss the impact to trails and the proposed Monon Trail detour. City representatives agreed with the proposed Monon Trail detour and requested that it become a permanent trail connection. They indicated that a 10-foot trail width was the

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minimum required, but a 12-foot width would be better. They also requested that a “node” be constructed where the trails intersect to provide safe entry and exit points (Appendix M, pages 47-50). A trail node is a circular area of pavement where trails intersect to provide safe user passing, and entry and exit points.

A follow-up meeting was held on January 31, 2020 with representatives from Indy Parks and Recreation, Indy Greenways, and Indianapolis DPW. The purpose of the meeting was to discuss the impact to trails and updates from the meeting in December 2019. INDOT agreed to keep portions of the Monon Detour as permanent trail connections, pending a maintenance agreement with the city. INDOT also agreed to make this permanent portion 12 feet wide at the city’s request and construct a node at the intersection point with the Monon Trail. INDOT did not agree to construct the sidewalk along Davidson Street because it is outside of the current project limits. At the city’s request, INDOT agreed to investigate keeping the portion of the Monon Detour southwest of the interchange a permanent feature. There may be some non-limited access right-of-way in this area that could be used for a trail. INDOT also agreed to investigate other pedestrian detour options along Davidson Street or Saint Clair Street and will follow up with the city (Appendix M, pages 51-53).

A second follow-up meeting was held on March 13, 2020 with representatives from Indy Parks and Recreation, Indy Greenways, and Indianapolis DPW. The purpose of the meeting was to discuss the impact to trails and updates from the meeting in January 2020. Discussion focused on the portion of the Monon Detour southwest of the interchange from College Avenue to 10<sup>th</sup> Street. INDOT is willing to keep this as a permanent feature if the City is willing to maintain and allow use of a portion of their right-of-way at 11<sup>th</sup> Street. The City supported using the right-of-way for the trail but would need to discuss with a developer who is planning a parking lot in this area. The City agreement is also contingent upon approval from the Department of Metropolitan Development and the Indianapolis Historic Preservation Commission. A possible pedestrian detour for 10<sup>th</sup> Street along St. Clair Street and Dorman Street was also discussed. Additional discussion regarding ADA requirements will occur (Appendix M, pages 54-56).

For FHWA to make a *de minimis* finding for Section 4(f) use of the Monon Trail, written concurrence that the proposed impacts will not affect the resource’s features, attributes, and activities is required from the party that has ownership or control of the resource (official with jurisdiction). In addition, in order for the temporary closure of Pogues Run Trail to qualify as a temporary occupancy, the official with jurisdiction is required to concur that the closure of the trail meets the five criteria for temporary occupancy. A letter was sent to the official with jurisdiction on March 24, 2020, requesting concurrence for both the temporary occupancy of Pogues Run Trail and the *de minimis* finding for the Monon Trail (Appendix M, pages 1-44). The official with jurisdiction agreed with both determinations and signed the letter on May 11, 2020 (Appendix M, page 4).

The public will be afforded an opportunity to review and comment on the effects of the proposed project regarding impacts to the Monon Trail via a legal advertisement that will be placed in a local publication notifying the public of the EA’s availability for review, comment and the date and venue of the public hearing, and the Section 4(f) *de minimis* finding. The 30-day review period for the Section 4(f) *de minimis* finding will be concurrent with the EA review period.

### Conclusion

The North Split Project will not require acquisition of right-of-way from any historic or recreational Section 4(f) properties. Therefore, no Section 4(f) resources will be altered or permanently incorporated into the transportation project and an individual Section 4(f) evaluation is not required.

Pogues Run Trail will be temporarily closed during project construction. It meets the five criteria for Section 4(f) temporary occupancy. Therefore, there will be no Section 4(f) use of the Pogues Run Trail.

Closure of the Monon Trail will be intermittent for up to two years. Because of the length of time the Monon Trail will be closed, a *de minimis* impact determination is proposed. The issuance of a FONSI will constitute FHWA’s approval of the *de minimis* finding.

The following are firm project commitments and are include in in *Section J – Environmental Commitments*

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- of this document.:
- The Indianapolis Cultural Trail (excluding the Payne Connection) will remain open during construction, and access will not be impacted.
  - A 90-foot section of Pogue’s Run Trail east of the Monon Trail along 10<sup>th</sup> Street shall not be closed more than three months during construction. This will satisfy Commitment #1 for temporary occupancy.
  - The Pogue’s Run Trail shall be fully restored, i.e., the property shall be returned to a condition which is at least as good as that which existed prior to the project. This will satisfy Commitment #4 for temporary occupancy.
  - A detour to the Monon Trail will be provided during construction. The portions of the trail from the Monon Trail to College Avenue and south along College Avenue will remain a permanent feature, pending a maintenance agreement from the City. INDOT will work the City of Indianapolis to determine if the portion from College Avenue to 10<sup>th</sup> Street could also remain as a permanent feature.
  - Trail nodes shall be constructed at the intersection of the Monon Trail and the detour trail and where the portion trail along the northern side of the interchange intersects the portion of the trail along College Avenue. The trail nodes shall be constructed in accordance with the Indy Greenways Design Standards.
  - If closure of both the Monon Trail and the prescribed pedestrian/bicyclist detour are required, the design-build team may provide a short-term temporary detour for bicyclists and pedestrians of no more than three consecutive days. A short-term detour can only be used two times per year and must have written approval from INDOT and the City of Indianapolis.

**Section 6(f) Involvement**

Presence

Use

**Section 6(f) Property**

Yes

No

*Discuss proposed alternatives that satisfy the requirements of Section 6(f). Discuss any Section 6(f) involvement.*

Remarks:

The U.S. Land and Water Conservation Fund Act of 1965 established the Land and Water Conservation Fund (LWCF), which was created to preserve, develop, and assure accessibility to outdoor recreation resources. Section 6(f) of this Act prohibits conversion of lands purchased with LWCF monies to a non-recreation use.

A review of the LWCF list maintained by the IDNR Division of Outdoor Recreation, there are 30 properties in Marion County (Appendix M, page 57). None of these properties are located within or adjacent to the project area. Therefore, there will be no impacts to 6(f) resources as a result of this project.

**SECTION E – Air Quality**

**Air Quality**

**Conformity Status of the Project**

Is the project in an air quality non-attainment or maintenance area?

<b>Yes</b>	<b>No</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If YES, then:

Is the project in the most current MPO TIP?

<b>Yes</b>	<b>No</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Is the project exempt from conformity?

<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	-------------------------------------

If the project is NOT exempt from conformity, then:

Is the project in the Transportation Plan (TP)?

<b>Yes</b>	<b>No</b>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Is a hot spot analysis required (CO/PM)?

<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Level of MSAT Analysis required?

Level 1a [ ] Level 1b [X] Level 2 [ ] Level 3 [ ] Level 4 [ ] Level 5 [ ]

Remarks:

STIP/TIP
This project is included in the Fiscal Year (FY) 2020-2023 Indianapolis MPO Regional Transportation Improvement Program (TIP) (Appendix H, page 12) and the 2020-2024 Statewide Transportation Improvement Program (STIP) (Appendix H, page 11).
Attainment Status
This project is located in Marion County, which is currently in attainment for PM2.5 and a maintenance area for Ozone (O3). Marion County includes a small maintenance area for Carbon Monoxide (CO) according to the IDEM County List: All Regulated Criteria Pollutants.
Ozone: This project is located in Marion County, which is currently a maintenance area for Ozone, under the 1997 Ozone 8-hour standard which was revoked in 2015 but is being evaluated for conformity due to the February 16, 2018, South Coast Air Quality Management District V. Environmental Protection Agency, Et. Al. Decision.
CO: A portion of the North Split project area is within a CO maintenance area roughly bounded by 11th Street to the north, Delaware Street to the east, Georgia Street to the south, and Capitol Avenue to the west.
Mobile Source Air Toxics
Early in the project development INDOT and FHWA started interagency consultation with USEPA, IDEM, and the Indianapolis MPO to determine if a quantitative mobile source air toxics (MSAT) analysis would be required for the project.
The purpose of this project is to rehabilitate and improve the existing interstate facilities leading to and through the North Split interchange by correcting deteriorated bridge and pavement conditions, improving safety, and improving interchange operations and reducing congestion.
Moreover, USEPA regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades.

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trends with USEPA's MOVES2014 model forecasts a combined reduction of over 90% in the total annual emissions rate for the priority MSAT from 2010 to 2050 while vehicle-miles of travel are projected to increase by over 45%. This will both reduce the background level of MSAT as well as the possibility of even minor MSAT emissions from this project.

**SECTION F – NOISE**

<b>Noise</b>	<b>Yes</b>	<b>No</b>
Is a noise analysis required in accordance with FHWA regulations and INDOT's traffic noise policy?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	No	Yes/ Date
<b>ES Review of Noise Analysis</b>		September 27, 2019 (Original Report) December 12, 2019 (Addendum) June 10, 2020 (Final Report)

Remarks: Because this project involves notable changes to the vertical alignment of I-65, I-70, and the North Split interchange, it is considered a Type 1 project. Therefore, in accordance with 23 CFR 772 and the INDOT Traffic Noise Analysis Procedure (2017), this action requires a formal noise analysis.

INDOT approved a Final Traffic Noise Technical Report on June 10, 2020 (Appendix I, pages 1-126). The latest version of the Traffic Noise Model (TNM) was used to model existing (2017) and design year (2041) worst (noisiest) hourly traffic noise levels within the North Split study area.

The TNM predicts a reduction in noise at most locations even if no noise barriers are installed. This modeled reduction in noise levels is primarily the result of the elevation and realignment of proposed roadways and replacement of guardrail with concrete safety barriers. Even with this reduction, noise receptors at some locations would be exposed to 2041 design year noise levels approaching or exceeding the FHWA noise abatement criteria of 67 dB(A) Leq(h).

A total of 396 TNM noise receivers representing 1,083 receptors, numbered R1 through R455, were modeled for the existing and proposed condition. These receivers were selected to model representative noise impacts at 957 Activity Category B receptors, 34 Category C receptors, 34 Category C/D receptors, 47 Category D receptors, and 11 Category E receptors. Existing (2017) worst (noisiest) traffic hour noise levels range from 37.6 to 73.5 dB(A) Leq(h). Worst traffic hour noise levels in the design year (2041) range from 37.6 to 73.8 dB(A) Leq(h). There are 259 noise receptors that would be exposed to 2041 design year noise levels approaching or exceeding the FHWA noise abatement criteria of 67 dB(A) Leq(h). The noise levels at these 259 receptors would range from 66.3 to 73.8 dB(A) Leq(h).

A Draft Traffic Noise Technical Report<sup>2</sup> was completed on September 24, 2019. INDOT approved this report on September 27, 2019. It identified four locations where noise barriers are feasible and may be reasonable pending the viewpoints of the benefited residents and property owners. They are:

1. Noise Barrier (NB)3E - Westbound I-70, along the edge of the north shoulder from Commerce Avenue to Valley Avenue, near the Martindale-Brightwood neighborhood
2. NB4 - Northbound I-65, along the edge of the north shoulder between College Avenue and Alabama Street, near the Old Northside neighborhood
3. NB5 - Southbound I-65, along the edge of the south shoulder between College Avenue and Alabama Street, near the Chatham Arch and Saint Joseph neighborhoods

<sup>2</sup> <https://northsplit.com/wp-content/uploads/2019/10/FINAL-North-Split-Draft-Noise-Report.pdf>

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4. NB7 - Southbound I-65/Westbound I-70, along the edge of the west shoulder between 10th Street and Ohio Street near Massachusetts Avenue and the Lockerbie Square neighborhood

An Addendum to the Draft Traffic Noise Technical Report<sup>3</sup> was completed for an additional noise barrier (NB3W) on December 6, 2019 after a new planned development was approved that make the cost per benefited receptor cost-effective. INDOT approved the Addendum on December 12, 2019. NB3W is described below:

5. NB3W - Westbound I-70, along the edge of the north shoulder from approximately Lewis Street to Commerce Avenue, near the Martindale-Brightwood neighborhood

In accordance with INDOT's Traffic Noise Analysis Procedure, surveys were mailed in October 2019 to benefited receptors and businesses that could have their line-of-sight blocked for NB3E, NB3W, NB4, NB5, and NB7 asking if they were in favor of a noise barrier near their property (Appendix I, pages 117-125). A second round of surveys was mailed to benefited receptors in November 2019 who did not respond to the original survey for NB4, NB5, and NB7.

Four highway noise barrier meetings were held for the North Split Project. The highway noise barrier meetings were held in locations adjacent to the project area where noise barriers were being considered. The purpose of the highway noise barrier meetings was to educate neighborhood residents on INDOT's Traffic Noise Analysis Procedure and encourage benefited receptors to complete a survey on whether they were in favor of a noise barrier at that location or not (Appendix I, pages 104-116).

Considering the results of the noise analysis, survey response, and other considerations, NB3E and NB3W were found to be feasible and reasonable and these barriers are recommended for implementation. Forty-five percent (45%) of NB3E benefited receptors responded, with 93% expressing support. Seventy-eight percent (78%) of NB3W benefited receptors responded, with 100% expressing support.

Considering the results of the noise analysis, survey response, and other considerations, NB4, NB5, and NB7 were found to be feasible but not reasonable and these barriers are not recommended for implementation. This determination is based on the following factors.

1. Noise reduction design features

The TNM predicts a reduction in noise at most locations even if no noise barriers are installed. To reduce noise levels further, INDOT is incorporating additional design features that are not recognized in the TNM. These features include the following:

- a. *"Next Generation" Pavement.* This new paving technique is designed specifically to reduce tire noise through the use of longitudinal grooves. Although results vary based on tire manufacturer, existing pavement type and condition, and other factors, recent studies have shown that next generation pavement can reduce tire noise levels by 3 to 5 decibels or more.<sup>4</sup>
- b. *Continuous Reinforced Concrete Pavement.* This paving technique eliminates the need for transverse joints, which are the cause of rhythmic sound patterns of tires passing over traditional concrete roadways.
- c. *Jointless Concrete Bridges.* This design eliminates the open joints at the end of bridges, which are the cause of the "banging" sounds typically heard at older bridges such as those currently existing in the project area.

2. Survey of benefited receptors. The responses for each barrier are shown below:

<sup>3</sup> <https://northsplit.com/wp-content/uploads/2019/12/North-Split-Noise-Technical-Report-Addendum.pdf>

<sup>4</sup> American Concrete Pavement Association and International Grooving and Grinding Association, *Development and Implementation of the Next Generation Concrete Surface*, August 8, 2017, pp 36-37.

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- a. *NB4*: Surveys were sent in mid-October 2019 and were sent to non-responders again early in November 2019. A majority (55%) of benefited receptors responded, with 59% expressing opposition to this barrier.
- b. *NB5*: Surveys were sent in mid-October 2019 and were sent to non-responders again early in November 2019. Despite two rounds surveys, four public meetings, social media posts, and emails, fewer than half (38%) of benefited receptors responded, with 74% expressing support for this barrier.
- c. *NB7*: Surveys were sent in mid-October 2019 and were sent to non-responders again early in November 2019. Despite two rounds surveys, four public meetings, social media posts, and emails, fewer than one-quarter (23%) of benefited receptors responded, with 62% expressing support for this barrier.

3. Other Considerations. In accordance with the INDOT Traffic Noise Analysis Procedure, which states “the concerns of opinions of the property owner and the unit occupants will be balanced with other considerations in determining whether a barrier is appropriate for a given location,” INDOT considered other reasonableness factors related to changes between existing and future build conditions in evaluating these barriers. These considerations are described below:

- a. *Effects to Historic Properties*: Six historic districts listed on the NRHP are located immediately adjacent or near the North Split Project area. INDOT, acting on behalf of FHWA, is required to comply with Section 106 of the National Historic Preservation Act of 1966 as amended (Section 106), and its implementing federal regulation, 36 CFR 800. Section 106 and 36 CFR 800 outline a process that requires FHWA and INDOT to evaluate the effects of undertakings on properties that are listed on or eligible for listing on the NRHP.

As a part of the Section 106 process, INDOT has conducted a series of meetings and reviews with consulting parties, including the SHPO, representatives from many of the adjacent historic neighborhoods, and other local historic organizations/agencies.

Following the consulting party meeting to review potential noise barriers, the SHPO provided a letter to INDOT and FHWA, dated November 1, 2019, making the following comments related to the effect of proposed noise barriers (Appendix D, pages 1639-1641):

“While we appreciate the benefit of noise reduction to the adjacent sound receptors, we remain deeply concerned about the visual effect of noise walls on the setting of historic resources, particularly within the St. Joseph Neighborhood, Chatham-Arch, and Old Northside historic districts. We also note the potential for additional adverse effects if noise barriers are constructed adjacent to the Massachusetts Avenue Commercial Historic District and Lockerbie Square Historic District.

We believe that the inclusion of noise barriers up to 19 feet above the freeway would introduce an additional and severe adverse effect to the character and setting of these resources, and greatly amplify the visual impact of the existing interstate highway intrusion within the historic districts. Construction of tall noise barriers would serve to further isolate historic districts and adjacent structures, and strengthen the perceived and actual separation between neighborhoods on either side of the highway.”

Another letter from a consulting party, provided by the Administrator for the Indianapolis Historic Preservation Commission on November 8, 2019, included the following comments (Appendix D, pages 1645-1647):

“Specifically, the construction of the following proposed noise barriers, which will be up to 19 feet above the freeway, creates a severe visual adverse effect by diminishing the above-mentioned historic areas feeling, setting and character and the properties/historic resources

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within them: NB4, NB5, NB7A, NB7B.

While I appreciate the mitigation efforts suggested by the consulting parties, exclusion of the barriers entirely is also a possibility.”

Several of the historic neighborhoods are also represented directly as consulting parties in the Section 106 process. The following additional Section 106 consulting parties submitted written comments in opposition to NB4, NB5, and NB7:

- Saint Joseph Historic Neighborhood Association
- Chatham-Arch Neighborhood Association
- Holy Cross Neighborhood Association
- Old Northside Neighborhood Association
- Historic Urban Neighborhoods of Indianapolis

Not constructing NB4, NB5, and NB7 is considered an avoidance and minimization measure as part of the Section 106 consultation process.

b. *Mixed-Use Developments:* The INDOT Traffic Noise Analysis Procedure recognizes the potential for conflicts in mixed-use developments, as barriers to protect residences may block line of sight to adjacent businesses. NB5 and NB7 are between the interstate highways and the Indianapolis central business district, which includes a concentration of mixed-use development.

Different views by residential and business receptors is most notable with NB7. Although the overall survey response rate along NB7 was only 23%, the survey response rate from businesses was near 50%. Of those businesses that responded, 90% were opposed to the installation of noise barriers. The responding businesses were scattered along the barrier location and not concentrated in one specific area.

Based on the studies completed to date, INDOT has identified 259 impacted receptors and has determined that noise abatement is likely, but not guaranteed, at two locations. Noise abatement at these locations is based upon preliminary design costs and design criteria. Noise abatement in these locations at this time has been estimated to cost \$690,930 and \$1,201,080 and will reduce the noise level by a minimum of 7 dB(A) at a majority of the identified impacted receptors. A reevaluation of the noise analysis will occur during final design. If during final design it has been determined that conditions have changed such that noise abatement is not feasible and reasonable, the abatement measures might not be provided.

The viewpoints of the benefited residents and property owners were sought and were considered in determining the reasonableness of highway traffic noise abatement measures for proposed highway construction projects. INDOT will incorporate highway traffic noise consideration in on-going activities for public involvement in the highway program.

**SECTION G – COMMUNITY IMPACTS**

**Regional, Community & Neighborhood Factors**

Will the proposed action comply with the local/regional development patterns for the area?  
 Will the proposed action result in substantial impacts to community cohesion?  
 Will the proposed action result in substantial impacts to local tax base or property values?  
 Will construction activities impact community events (festivals, fairs, etc.)?  
 Does the community have an approved transition plan?  
 If No, are steps being made to advance the community’s transition plan?  
 Does the project comply with the transition plan? (explain in the remarks box)

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Remarks:

The land use in the project area is heavily urbanized with little remaining undeveloped land. I-65, I-70, and the interchanges in the project area provide access to and from residential neighborhoods throughout the city and neighboring counties and the City of Indianapolis Central Business District. Mapping of the project area neighborhoods is provided in the Environmental Justice Technical Memorandum (Appendix K, page 9).

### Community Cohesion/Neighborhood Impacts

The interactions among people within the project area neighborhoods are collectively called “community cohesion,” which is an important part of strong, vibrant, and safe communities. Community cohesion factors include whether or not there are physical barriers dividing neighborhoods, how residents know and interact with their neighbors and the level of participation in community-based activities. The project is not anticipated to negatively affect quality of life in neighborhoods, nor will it affect interactions among persons and groups or change social relationships and patterns. The project will be constructed entirely within the existing transportation right-of-way with no residential or commercial relocations.

The project will alter the visual landscape in areas immediately adjacent to the interstates, as described below:

- The roadway will be higher than the existing roadway(s) in some areas. The greatest changes in height are in the center of the North Split interchange (with a 17-foot increase over the existing interchange high point) and on the west leg of the interchange. The maximum height increase is 22 feet for the I-65 to I-70 eastbound bridge over College Avenue. In general, the change in height decreases as the distance from the center of the North Split interchange increases.
- The roadway will be closer to adjacent homes and businesses in some areas. For example, the Pennsylvania Street ramp from I-65 will be reconstructed. Although this work will occur within the existing right-of-way, the reconstruction will move the roadway approximately 26 feet closer to adjacent homes and businesses.
- The roadway will be further from homes and businesses in some areas. For example, the exit ramp from I-70 westbound to Pennsylvania Street will be removed. This will include removal of the existing northernmost bridge over College Avenue, which will move the proposed roadway approximately 175 feet further from existing homes and businesses.
- Steeper side slopes or retaining walls (ranging in height from 8 to 16 feet) will be required in some areas to avoid property impacts. During the alternatives analysis, the number and height of retaining walls was minimized to the greatest extent possible.
- Two noise barriers (NB3E and NB3W), ranging in height from 10 to 20 feet, are recommended to be built to mitigate predicted noise impacts along the north side of westbound I-70, east of the interchange.
- Landscaping within the existing right-of-way will change. In the existing condition, brush and small trees in the right-of-way provide some visual screening of the highway. Larger trees are present on the north side of I-65 northbound. "Do Not Disturb" areas have been identified to preserve existing trees where possible. It is anticipated that some of the existing vegetation will be removed from within the right-of-way, including some mature trees along the north side of I-65 near the Old Northside neighborhood. Trees and shrubs will be planted within the existing right-of-way in accordance with the North Split Aesthetic Design Guidelines, which are available in Appendix G, pages 214-326.

### Traffic Impacts

The project will change interstate access at two locations:

- Westbound traffic from I-70 will no longer be able to exit at the Meridian Street/Pennsylvania Street ramp on the north side of downtown; and
- Traffic entering the interstate at Meridian Street/Delaware Street will no longer have access to I-65 southbound or the collector-distributor (C-D) road on the east side of downtown. Southbound I-65

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traffic will still be able to access the C-D road.

The access changes described above are a trade-off to minimize the footprint of the roadway, which was an expressed desire of the local communities. These access changes will divert some traffic to other interchanges and local roadways. Approximately 16,800 vehicles are forecasted to exit the interstates in the downtown area during the AM peak hour in 2041. Due to the changed access conditions, the project will alter the travel patterns of approximately 6.7% of this traffic (1,130 vehicles), as it will require use of alternative exits on I-70. Likewise, 12,300 vehicles are forecasted to enter the interstates within the downtown area during the PM peak hour in 2041. The project will alter the travel patterns of approximately 3.6% of this traffic (440 vehicles). The downtown street network is well-developed, and there are multiple routes available to accommodate the diverted traffic. The resulting changes in travel patterns will increase traffic on some local streets and decrease it on others, but the total volume of traffic in the downtown area is not anticipated to substantially change from the No Build condition.

The existing Meridian Street interchange with I-65 is a split diamond with access to Illinois Street, Meridian Street, Pennsylvania Street, and Delaware Street. Eliminating the Meridian/Delaware Street entrance ramp to southbound I-65 and the C-D road will create a partial interchange, which is typically avoided by FHWA since some motorists would be unable to reenter at the same location. To address these concerns, wayfinding signage will be provided to indicate alternative routes to enter I-65. FHWA granted conditional approval of the use of a partial interchange in a Determination of Engineering and Operational Acceptability on August 12, 2019 (Appendix J, page 1). Final approval will be provided after the NEPA process has been completed.

Local travelers will benefit from improved traffic operations on the interstates. The project will eliminate the weaving sections on the west leg of the system interchange near the Pennsylvania and Delaware Street ramps, which will improve traffic flow by removing the most severe bottlenecks in the project area. Under the existing condition, traffic back-ups extend up to three miles on I-65 and I-70 in the AM peak hour. An interstate queueing analysis showed that the proposed improvements will virtually eliminate traffic back-ups in the project area. The proposed improvements will reduce total project area delay in 2041 by 20.3% in the AM peak hour and 6.8% in the PM peak hour. In addition, the proposed improvements will result in shorter, more direct trips for many motorists. Additional details regarding the permanent traffic impacts associated with the project are provided in the Traffic Technical Memorandum (Appendix J, pages 2-23).

The North Split Project will improve safety at the top four crash sites in the project area. A traffic safety analysis documented in the Traffic Technical Memorandum predicts the proposed improvements will reduce crashes at the northbound I-65 weave at the Meridian/Pennsylvania Street exit and southbound I-65 weave at the Meridian/Delaware Street entrance by 21.2%. Crashes at the eastbound I-70 curve are predicted to be 9.9% lower, and crashes at the southbound I-65/I-70 merge are predicted to be 2.8% lower. The project will be built to higher design standards for modern interstate construction, which will improve safety throughout the project area.

### **Americans with Disabilities Act (ADA) Compliance**

In accordance with the ADA of 1990, INDOT maintains an ADA Transition Plan to guide efforts to make its programs, services, and activities accessible to individuals with disabilities. INDOT is responsible for addressing ADA compliance for projects that receive funding through INDOT. The North Split Project will be designed in accordance with INDOT's design standards, which are consistent with the Public Right-of-way Accessibility Guidelines, which have been adopted by and recommended as best practices by FHWA. The design-build team will be required to meet the requirements of the ADA Transition Plan during construction.

The most recent City of Indianapolis' ADA Implementation/Transition Plan was developed and considered effective in 2013. An annual report demonstrating continued implementation of accessibility enhancements was prepared by the City of Indianapolis on December 28, 2018. The project will be designed in accordance with the plan and all applicable ADA requirements.

The North Split Project was developed in accordance with INDOT's Title VI Nondiscrimination Policy. No groups of people have been or will be excluded from participating in public involvement activities, denied

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the benefit of the project or subjected to discrimination in any way on the basis of race, age, sex, national origin, disability or religion. Public involvement activities were hosted at facilities that are accessible to persons with disabilities.

### **Land Use Impacts**

The future land use vision for the City of Indianapolis is contained within the land use element of the city's Comprehensive Plan. The Comprehensive Plan is a collection of over 100 plans, each separately adopted by the Metropolitan Development Commission as a contributing element. These plans include specific area/neighborhood plans, as well as transit-oriented development strategic plans for the IndyGo Red and Blue Line Bus Rapid Transit projects. The project is consistent with existing and future land use plans in the City of Indianapolis and will not change existing land use or development patterns. Current plans for three bus rapid transit lines and IndyGo service improvements have been included in transportation models used for North Split planning, and coordination meetings have been held throughout the development process with IndyGo and the Indianapolis MPO to fully consider transit in the project's development. The project will not impact the local tax base through the conversion of land to transportation use, nor will it directly impact property values. The proposed improvements will benefit safety and mobility, which is expected to benefit the local economy over the long term.

### **Temporary Impacts**

Potential temporary community impacts during construction of the project are discussed below.

#### Air Quality (Emissions and Dust)

Demolition and construction activities may result in short-term increases in dust and equipment-related particulate emissions in and around the project area. Equipment-related particulate matter emissions could be minimized if the equipment is well-maintained. The potential air quality impacts will be short-term, occurring only while demolition and construction work is in progress and local conditions are appropriate.

Construction vehicle activity and the disruption of normal traffic flows may result in increased motor vehicle emissions within certain areas. Air quality impacts will be minimized by following the requirements for dust control according to INDOT Standard Specifications. Additionally, the design-build team will be required to comply with all applicable air quality regulations.

#### Noise and Vibration

Construction of the proposed improvements will temporarily increase noise levels along I-65 and I-70 within the limits of the proposed improvements. Major construction elements of this project are expected to be demolition, hauling, grading, paving, and bridge construction. General construction noise impacts for passersby and individuals living or working near the project can be expected from these activities. Adverse effects related to construction noise are anticipated to be of a localized, temporary, and transient nature.

Ground-borne vibration from construction activities has the potential to affect nearby buildings. Blasting and pile driving are traditionally associated with high levels of vibration; however, vibration may also occur in areas of excavation, demolition, and vibratory compaction. The North Split Project will not require blasting. The potential for vibration impact will be greatest at locations near pile-driving for bridges and other structures, pavement demolition for removal, and at locations close to vibratory compactor operations. Vibration created by the movement of construction vehicles such as graders, loaders, dozers, scrapers, and trucks are generally the same order of magnitude as the vibration caused by heavy vehicles traveling on streets and highways. In general, ground-borne vibration from vehicles on streets is not sufficient to impact adjacent buildings.

To avoid vibration impacts resulting from construction activities the design-build team will be required to prepare a construction Vibration Monitoring and Control Plan. The plan will include provisions to monitor historic and other vibration-sensitive structures during construction, measures to reduce construction vibration, such as changing the location and timing of vibration operations, and methods for keeping the public informed and responding to complaints.

#### Economic Conditions

During construction, public funds will be spent in the project area, which may result in temporary positive

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economic effects. These effects include direct income for construction workers who may then buy services and goods within the area. In addition, local materials suppliers may benefit from providing goods to the design-build team. Although access to businesses will be maintained during construction, it is also possible that businesses along local city streets may experience temporary negative economic impacts. Commuters, business patrons, shippers, and suppliers may experience short-term inconvenience and increased travel times.

### Vehicular Traffic

To assess the potential short-term construction effects associated with changes in traffic volumes, this part of the analysis assumed the entire North Split interchange will be closed during construction. Full closure represents a worst-case scenario for additional temporary traffic on the city roadway network; however, the conceptual MOT plan allows closure of portions of the interchange while keeping other traffic movements open. See the *Maintenance of Traffic (MOT) During Construction* section above for additional details.

The North Split interchange serves more than 214,000 vehicles per day. A complete closure of the North Split interchange during construction would require this traffic to find alternative routes to access downtown. The potential range of alternative routes varies greatly and depends, in large part, on the origins and destinations of the traffic. Based on current projections, traffic increases on local streets would range from 200 to 5,000 vehicles during the AM and PM peak hours. It is anticipated the largest traffic increases will occur on the following routes:

- 10th Street
- West Street/Missouri Street
- 21st Street
- Massachusetts Avenue
- Keystone Avenue/Rural Street
- Washington Street
- 30th Street
- Pennsylvania Street
- 16th Street
- Fall Creek Parkway
- New York Street
- Michigan Street
- Delaware Street
- College Avenue
- 38th Street
- Dr. Martin Luther King Jr. Street
- Maryland Street
- Oscar Robertson Boulevard/11th Street
- Central Avenue
- Emerson Avenue

During construction, traffic will temporarily increase in some neighborhoods. Residents and businesses along detour routes will experience temporary increases in noise and vehicular emissions, as well as longer travel times due to the increased congestion. Community events will be impacted because regional travelers will also experience increased travel times and distances. These effects will be more pronounced for those who currently use the interchange for daily commuting to and from work.

INDOT is implementing a Mobility Management Plan (MMP) to address maintenance of traffic on local streets and minimize delay and disruption in the construction area. The plan is being developed in coordination with the Indianapolis DPW, IndyGo, and the Central Indiana Regional Transportation Authority. The plan will be reviewed and adjusted as necessary throughout the construction process. The MMP will address road closures, detour routes (including any required adjustments to signal timing, the number of lanes, on-street parking, or pavement conditions), coordination with other projects, optimal construction staging and sequence, and communication platforms and procedures. As part of the MMP, INDOT will also coordinate with major employers to promote strategies such as working remotely or flexible work schedules to alleviate traffic congestion during construction.

In conjunction with the MMP, a robust public information program will be carried out in advance of construction and throughout the duration of the project. A Public Information Plan (PIP) has been prepared and will be updated throughout the construction period. Frequent communication with motorists, residents, neighborhood groups, downtown employers, major event venues, and other stakeholders is a primary objective of the MMP and the PIP. Current information about construction activities, closures, and detours will also be available via social media and the project website ([www.northsplit.com](http://www.northsplit.com)).

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## Indirect and Cumulative Impacts

Will the proposed action result in substantial indirect or cumulative impacts?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Remarks:

Indirect impacts are effects which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate. Cumulative impacts affect the environment which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such actions.

An Indirect and Cumulative Effects Assessment (ICEA) Technical Memorandum was completed for the North Split Project (Appendix L, pages 1-17). The ICEA relied on secondary source information, such as geographic information system (GIS) databases, U.S. Census data, previous project reports, City of Indianapolis studies and planning documents, and other studies and initiatives. The study area for the ICEA included a 0.5-mile buffer around I-65 and I-70 along the project limits (Appendix L, page 5). The time horizon for the ICEA is 2041, which is consistent with the design year for the North Split Project, the 2045 LRTP, and the Comprehensive Plan for Indianapolis and Marion County (Comprehensive Plan). Notable features identified in the project area include:

- Community facilities (e.g., schools, parks, trails, religious facilities, police/fire/medical facilities);
- Other infrastructure facilities (e.g., freight railroads, public and private airports, pipelines)
- Water resources (e.g., streams, wetlands, lakes, floodplains);
- Hazardous materials sites; and
- Historic resources.

### Indirect Impacts

The project is located within a densely urbanized area with limited adjacent land that could be available for development/redevelopment. The project will not add additional through travel lanes, will not substantially improve or provide new access, and will not substantially alter regional travel times. Given the scope of the proposed improvements and the existing study area trends, as well as the local land use plans and related policies, the North Split Project is not anticipated to notably influence future land use changes.

Best management practices will be used during construction activities to minimize potentially negative indirect effects to natural resources, including air and water quality. Private developments will be required to follow applicable local, state and federal laws and permitting requirements.

The project will remove the westbound I-70 exit at the Pennsylvania Street ramp and the I-65 southbound/C-D road entrance from Meridian Street/Delaware Street. Together, these access changes are anticipated to alter travel patterns on local streets leading to/from I-65 and I-70. The altered travel patterns will increase traffic on some local streets and decrease it on others, but the total volume of traffic in the ICEA study area is not anticipated to substantially change from the No Build condition. In addition, traffic increases associated with population and development growth are already occurring within the ICEA study area and are anticipated to continue regardless of the project. As a result, the permanent traffic changes resulting from the project are not anticipated to indirectly effect land use patterns or affect existing growth trends within the ICEA study area. In addition, the permanent changes in traffic volumes are not expected to diminish the long-term viability of businesses within the affected corridors.

Traffic increases on the local street network could result in localized increases in air emissions, but regional air quality is not anticipated to be negatively affected. Similarly, the changes in traffic volumes could increase noise on some local streets, while decreasing noise on others. In general, doubling the traffic volumes would produce a 3 decibel increase in the noise level – which is the noise increase that is detectable by the human ear. Anticipated traffic changes due to the North Split Project will not approach this level of growth or noise at any location in the local street network.

Given the above, the North Split Project will have minimal indirect effects to the ICEA study area resources. Additional details about the project's indirect impacts are provided in the Indirect and Cumulative Effects

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Assessment Technical Memorandum (Appendix L, pages 1-17).

**Cumulative Impacts**

The construction of the inner loop shaped the historic growth patterns in the downtown area, including the adjacent residential neighborhoods. I-69, I-70, and I-65 were originally planned as radial interstate routes which were intended serve the Indianapolis urban area. The North Split Project includes portions of I-65 and I-70 that were constructed in the 1960's and 1970's. The North Split also included accommodations for a future I-69 connection to the north, which was never constructed. Construction of the radial interstates displaced an estimated 17,000 residents (Smith, 2016). Additionally, the interstates created a barrier effect between the adjacent residential neighborhoods and the Indianapolis Central Business District.

The project will be built entirely within the existing transportation right-of-way with no residential or commercial relocations. In response to public input, INDOT modified the project scope such that the overall interchange has a smaller footprint and does not construct additional through traffic lanes. The interstate will be widened and/or shifted in some locations. It will be a maximum of 26 feet closer to neighborhoods previously impacted by the original interstate construction, specifically along I-65 west of the interchange. In addition, the project will build retaining walls and potential noise barriers adjacent to neighborhoods that were impacted by the original interstate construction. CSS design elements are incorporated into the project to help integrate the project into the surrounding neighborhoods. INDOT has solicited feedback from project stakeholders, including affected residents, regarding CSS elements. As a result of the CSS process, INDOT developed the North Split Aesthetic Design Guidelines which are available in Appendix G, pages 214-326. The Aesthetic Design Guidelines include treatments for the interstate infrastructure (such as underpass treatments, sidewalks, public art space, retaining walls, abutment walls, bridge columns, lighting, signage, fencing) as well as landscaping within the existing right-of-way.

Over the past few years, downtown Indianapolis has experienced a high level of growth and private investment. Some adjacent residential neighborhoods have also experienced growth. The growth in downtown Indianapolis is evidenced by numerous planned private development projects in the ICEA study area, which are responding to market demand. There are also large public infrastructure investments occurring in the ICEA study area, including IndyGo bus rapid transit projects and, the Citizens Energy Group deep tunnel system. It is anticipated these actions will occur regardless of the project. In some cases, notable human and natural resources within the ICEA study area could be negatively affected by the reasonably foreseeable planned development; however, there are provisions in existing local development policies and regulations that will temper potentially negative effects. These activities will also be subject to state and, in some cases, federal regulations and permitting requirements.

When considering the scope of the proposed improvements in the context of past, present and reasonably foreseeable future actions, the cumulative effect of this project on notable human and natural resources will be minimal. Additional details about the project's cumulative impacts are provided in the Indirect and Cumulative Effects Assessment Technical Memorandum (Appendix L, pages 1-17).

**Public Facilities & Services**

Will the proposed action result in substantial impacts on health and educational facilities, public and private utilities, emergency services, religious institutions, airports, public transportation or pedestrian and bicycle facilities? *Discuss how the maintenance of traffic will affect public facilities and services.*

<b>Yes</b>	<b>No</b>
<input type="checkbox"/>	<input checked="" type="checkbox"/>

Remarks:

Based on a desktop review, site visits on October 3-4, 2017; October 12, 2018; April 10 and June 26, 2019, by HNTB, the aerial map of the project area (Appendix B, pages 4-16), and the RFI report (Appendix E, page 2), there are 34 religious facilities, one hospital, 12 schools, 11 recreational facilities, 11 railroads, 11 trails, and 12 managed lands located within 0.5 mile of the project. Six airports/heliports are within 3.8 miles of the project area. The following properties or resources are adjacent to or near the project area:

Religious Facilities

The RFI report mapped 12 religious facilities adjacent to the project area. However, further investigation indicates six of those are either no longer functioning as a religious facility or are not mapped in the correct location and are not near the project area. An additional six religious facilities were identified adjacent or

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near the project area via site visits and a Google Earth review. Coordination letters were sent on November 22, 2019 to the New Bethel Missionary Baptist Church, Church of God in Christ, Saints Peter and Paul Roman Catholic Cathedral, African Methodist Episcopal Church – Allen Chapel, Grace Missionary Baptist Church, Eastside New Hope Missionary Baptist Church, Traders Point Christian Church Downtown Hillside Christian Church, Upper Room Apostolic Church, Greater Bethlehem Missionary Baptist Church, Foundation of Truth Worship Center, and Church of Christ Park Avenue (Appendix C, pages 142-144). No responses from religious facilities were received. All work will take place within the existing state and city right-of-way. Access to all religious facilities will be maintained during construction. Therefore, no direct impacts are expected. Portions of the interstates and local streets will be temporarily closed during construction. This may require religious facility users to take a different route to the facility.

### Schools

The RFI report mapped one school adjacent to the project area, the Indiana Non-Public Education Association. An additional two schools were identified adjacent or near the project area via site visits and a Google Earth review. Coordination letters were sent to the Indiana Non-Public Education Association, Indianapolis Public Schools, Legacy Learning Center, and The Oaks Academy on November 22, 2019 (Appendix C, pages 142-144). No responses from schools were received, but Indianapolis Public Schools and IUPUI are represented on the project CAC. All work will take place within the existing state and city right-of-way. Access to all schools will be maintained during construction. Therefore, no direct impacts are expected. Portions of the interstates and local streets will be temporarily closed during construction. This may require school attendees and staff to take a different route to the school.

### Recreational Facilities/Managed Lands

The RFI report mapped one recreational facility and managed land adjacent to the project area, the Old Northside Soccer Park/Frank and Judy O'Bannon Soccer Field. This property is owned by INDOT and borders the interchange to the north. An early coordination letter was sent to Indy Parks and Recreation on October 18, 2017 (Appendix C, pages 1-6). No response was received; however, three meetings have been held with Indy Parks and Recreation as described in *Section D – Section 4(f) Resources* above. The Old Northside Trail is located with this park and will be widened and used as part of a detour for the Monon Trail during construction (Appendix M, page 44). Access to this park will be maintained during construction; however, portions of the interstates and local streets will be temporarily closed during construction. This may require park users to take a different route to the park. The road closures will cease after construction is complete.

### Trails

Impacts to trails are discussed in *Section D – Section 4(f) Resources* above.

### Hospitals/Emergency Services

The RFI report mapped one hospital, Methodist Hospital (now IU Health Methodist Hospital) adjacent to the 0.5-mile search radius. A coordination letter was sent to the IU Health Methodist Hospital on November 22, 2019 (Appendix C, pages 142-144). No response from the hospital was received. A meeting with emergency services providers was held on October 18, 2018, at the Indianapolis Traffic Management Center (Appendix C, pages 133-138). The presentation described the need for the project, alternatives screening process, and next steps in the process. Representatives from Indianapolis Emergency Medical Services, IMPD Homeland Security Bureau, IU Health Methodist Hospital, Indianapolis Metropolitan Police Department, Indianapolis Fire Department, and Indianapolis Traffic Management Center attended. A project update presentation was provided to the Indiana State Police on December 6, 2018 at the Indiana Government Center North Room 335 (Appendix C, pages 139-141). The presentation described the need for the project, alternatives screening process, and next steps in the process. Access to all hospitals and emergency services will be maintained during construction. Therefore, no direct impacts are expected. Portions of the interstates and local streets will be temporarily closed during construction. This may require emergency services to take a different route to their destination. Coordination will continue with emergency services as part of the MMP.

School bus travel times and emergency response times may temporarily increase during construction of the project due to increased congestion resulting from construction activities, potential access restrictions in construction zones, lane closures, and detours. The MMP and PIP include methods to proactively notify

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public services of temporary changes in traffic patterns. In addition, the design-build team is required to develop and implement a Traffic Incident Management Plan in cooperation with law enforcement and emergency responders from throughout the region. The plan will be reviewed and adjusted as necessary throughout the construction process to minimize impacts to public services.

It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access.

### Utilities/Railroads

The CSX railroad is located within the project area. The interstates cross the railroad south of Ohio and Pine Streets. The railroad parallels the interstates to the east from Ohio Street to 10<sup>th</sup> Street, where the rail line turns to the northeast to parallel I-70. Coordination with the CSX railroad has been initiated.

Coordination with utilities has also been initiated. The project will require relocation of Indianapolis Power and Light overhead power lines, Citizens Energy Group water and sanitary lines, and other utilities. Utility relocation work plans are being developed.

### Airports/Heliports

The RFI report mapped four heliports within the 0.5-mile search radius. Two additional airports were identified in the 3.8-mile search radius. There will be no direct impact to any of these facilities. An early coordination letter was sent to INDOT Aviation on October 18, 2017 (Appendix C, pages 1-6). INDOT Aviation responded in a letter dated October 26, 2017, noting the Indianapolis Downtown Heliport is located 0.25 nautical miles west of the southernmost portion of the project corridor. They indicated, based upon the provided information, an Indiana Tall Structure permit would not be required unless the project involves the construction of a temporary (e.g. crane) or permanent structure that penetrates a 25:1 slope from the nearest point of the Indianapolis Downtown Heliport helipad (Appendix C, page 22). Additional coordination occurred with INDOT Aviation and it was determined an Indiana Tall Structure permit and a Federal Aviation Administration (FAA) permit will be required for the project (Appendix C, pages 23-26). A coordination letter was sent to IU Health Methodist Hospital, Pielet Brothers, and Channel 13, as owners of the heliports, on November 22, 2019 (Appendix C, pages 142-144). No responses from these facilities were received.

### Public Transportation

Public transportation in Indianapolis and Marion County is provided by IndyGo. An early coordination letter was sent to IndyGo on October 18, 2017 (Appendix C, pages 1-6). IndyGo responded in an email dated November 20, 2017 (Appendix C, page 36). IndyGo stated they are happy to be a close partner with INDOT to help mitigate some of the traffic impacts during construction of the project. This is being accomplished with IndyGo's involvement in the transportation demand management component of the MMP.

Since 10 of the 30 fixed bus routes operated by IndyGo pass through at least one of the underpasses being replaced in the North Split project, temporary route detours will need to be continually managed during construction. Coordination meetings have been held with IndyGo to pre-plan the detours, and frequent real-time schedule updates will be provided to IndyGo throughout the construction process to support their implementation.

The Central Indiana Regional Transportation Authority (CIRTA) is a regional organization, with representatives from 10 Central Indiana counties. CIRTA coordinates transit planning and implementation for the region with other transit partners, such as local service providers and the MPOs. CIRTA operates multiple vanpools in the region and provides trip matching services for carpools. Coordination has occurred with CIRTA throughout the North Split development process and will continue through the transportation demand management activities of the MMP.

### Bike/Pedestrian Facilities

Sidewalks are present under the interstate bridges at Pennsylvania Street, Alabama Street, Central Avenue, College Avenue, Commerce Avenue, Valley Avenue, 10<sup>th</sup> Street, St. Clair Street, Michigan Street, Vermont Street, New York Street, Market Street, and Washington Street. Bike lanes are present under the interstate bridges at 10<sup>th</sup> Street, Michigan Street, and New York Street. Construction of the local road underpasses will

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be phased so adjacent roads are not closed at the same time. They will be closed for a maximum of 90 days. Temporary detour routes will be required for pedestrians and bicyclists during construction.

Pedestrians and bicyclists will also benefit from the construction of the project. Public comments from the Rethink 65/70 Coalition and adjacent neighborhoods requested underpasses with wider sidewalks and buffers from vehicular traffic, better lighting, deterrence of “camping”, positive drainage systems, easy maintenance, graffiti resistance finishes, and durable, long-lasting materials. The Central Avenue, College Avenue, 10<sup>th</sup> Street, St. Clair, Michigan Street, Vermont Street, New York Street, Market Street, and Washington Street bridges will be replaced by the project. Existing pedestrian and bicycle facilities under the bridges – such as greenways, sidewalk connections, and on-street bicycle lanes – will be maintained or enhanced. The project will also enhance pedestrian and bicycle safety and mobility by providing wider bridge openings, replacing or installing new lighting under the bridges, and building wider sidewalks.

Public Health

INDOT/FHWA NEPA documents are developed under two guiding regulations: (1) the Council on Environmental Quality’s National Environmental Policy Act regulations (40 CFR 1500-1508), which are applicable to all federal agencies; and (2) FHWA environmental impact and related procedures detailed under 23 CFR Part 771. Together, these regulations set forth all FHWA requirements under NEPA for the processing of highway actions, such as the North Split Project. Although these guiding regulations do not specifically require the completion of a health impact assessment, they do require the INDOT/FHWA to consider potential effects to resources that could contribute to health-related outcomes. These resources include air quality, safety, land use, parks and recreational facilities, public facilities and services, and traffic noise. The results of these analyses and the overall conclusion as it relates to their significance in the context of NEPA are detailed in the appropriate sections of this EA.

During the NEPA process, several refinements were made to the design of the preferred alternative. These changes were largely based on the feedback received from stakeholders, including potentially affected residents and businesses. These design refinements are aligned with the Centers for Disease Control and Prevention (CDC) strategies for achieving health-oriented transportation projects, including the following:<sup>5</sup>

- Incorporate Healthy Community Design Features
  - Designing streets to serve the needs of all transportation modes.
  - Mitigating roadway noise.
- Ensure Equitable Access to Transportation Networks
  - Ensuring public participation in transportation planning and decision-making.
  - Providing multi-modal transportation options to ensure safety and accessibility of the roadway for all users.
- Promote Active Transportation
  - Accommodating all roadway users with comprehensive street design measures such as “complete streets,” including sidewalks, bicycle lanes, and share-the-road signs that provide safe and convenient travel for all users of the roadway.
  - Providing safe and convenient bicycle and pedestrian connections to public parks and recreation areas.
  - Promoting safe roadway crossing through use of pedestrian refuge islands and crosswalks.
  - Providing streetscape amenities such as benches, landscaping, lighting, and public art.
- Improve Safety for All Users
  - Ensuring adequate lighting on roadways, along trails, and in parks.

**Environmental Justice (EJ)** (Presidential EO 12898)  
 During the development of the project were EJ issues identified?  
 Does the project require an EJ analysis?  
 If YES, then:  
 Are any EJ populations located within the project area?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

<sup>5</sup> [https://www.cdc.gov/healthyplaces/transportation/hia\\_toolkit.htm](https://www.cdc.gov/healthyplaces/transportation/hia_toolkit.htm), accessed July 19, 2019.

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Will the project result in adversely high or disproportionate impacts to EJ populations?

Remarks:

Under FHWA Order 6640.23A, FHWA and the project sponsor, as a recipient of funding from FHWA, are responsible to ensure that their programs, policies, and activities do not have a disproportionately high and adverse effect on minority or low-income populations. Per the current "INDOT Environmental Justice (EJ) in NEPA Documentation Process" guidance document, analysis is required for any project that requires an EA. The North Split Project requires an EA, and thus requires EJ analysis. The project will be constructed entirely within the existing transportation right-of-way, and no residential or commercial relocations will be required. Minority and low-income populations are located within and around the project area, and possible EJ concerns were identified during project development due to the length of the construction timeframe and possible closure of the interchange. The EJ analysis for the North Split Project is documented in an Environmental Justice Technical Memorandum (Appendix K, pages 1-224).

Potential EJ impacts are detected by locating minority and low-income populations relative to a reference population to determine if populations of EJ concern exist and whether they could be experience disproportionately high and adverse impacts. The reference population may be a county, city, or town and is called the community of comparison (COC). In this project, the COC is the City of Indianapolis. The EJ analysis area for the North Split Project is approximately six miles by six miles and extends east-west from the White River in the west to Emerson Avenue in the east. The north-south limits extend from 38th Street in the north to Raymond Street in the south. The EJ analysis area was established to consider potential changes in traffic and travel patterns during construction and corresponds to the project's traffic study area. The EJ analysis area contains 155 U.S. Census block groups. The EJ analysis area is shown in the Environmental Justice Technical Memorandum (Appendix K, page 5).

A population of concern for EJ exists if the population is more than 50% minority or low-income or if the low-income or minority population is 125% of the COC. Data from the 2013-2017 American Community Survey 5-Year Estimates was obtained from the US Census Bureau Website <https://factfinder.census.gov/> on September 20, 2019 by HNTB. The data collected for minority and low-income populations within the EJ analysis area are tabulated in the Environmental Justice Technical Memorandum (Appendix K, pages 37-48).

Of the 155 block groups in the EJ analysis area, 76 (49%) have concentrations of minorities above 50% (Appendix K, page 12). Furthermore, 104 (67%) of the block groups have concentrations of low-income populations that are above the 125% COC threshold of 25.1% (Appendix K, page 11). Therefore, minority and low-income populations of EJ concern are present in the EJ analysis area.

### Conclusion

The characteristics of the project area are such that any project – including the proposed North Split Project – could have an impact on low-income or minority populations. Public and stakeholder engagement played a key role in assessing the project's impacts to populations of EJ concern, including:

- CAC meetings
- EJ Working Group meetings
- Presentations at neighborhood association meetings, town halls, and CSS workshops
- Individual stakeholder meetings
- Public open houses

A public survey was developed to engage affected communities, particularly those in areas with populations of EJ concern. A targeted outreach campaign was employed to distribute the survey throughout the EJ analysis area. The public survey could be completed online, via a printed copy, or by phone.

The project will permanently impact populations of EJ concern by increasing noise levels in some areas, altering the visual landscape and community cohesion; and changing travel patterns and access. Noise impacts are predicted at 201 receptors in areas with populations of EJ concern. Two noise barriers (NB3E and NB3W) may be constructed and would mitigate 48% of predicted noise impacts and provide additional benefits to 106 receptors in areas of EJ concern. Additional information regarding noise barriers and other measures used to reduce noise is earlier in this document in *Section F – Noise*.

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The project will have impacts to the visual setting in some areas immediately adjacent to the interstates. Alterations to the visual landscape include changes in roadway height and location, steeper side slopes and/or retaining walls, potential noise barriers, and removal of existing vegetation (including some mature trees along the north side of I-65 near the Old Northside neighborhood). The retaining walls and noise barriers may also have minor impacts to community cohesion in areas with populations of EJ concern.

CSS design elements will be incorporated into the project to enhance the visual landscape and to help integrate the project into the surrounding communities. As a result of the CSS process, INDOT developed the North Split Aesthetic Design Guidelines which are available in Appendix G, pages 214-326. The Aesthetic Design Guidelines include treatments for the interstate infrastructure (such as underpass treatments, sidewalks, public art space, retaining walls, abutment walls, bridge columns, lighting, signage, fencing) as well as landscaping within the existing right-of-way.

The project will remove the westbound I-70 exit at the Pennsylvania Street ramp and the I-65 southbound/C-D road entrance from Meridian Street/Delaware Street. Together, these access changes are anticipated to alter travel patterns on local streets leading to/from I-65 and I-70. Traffic levels will increase on some local streets and decrease on others, but the total volume of traffic in the EJ analysis area is not anticipated to change substantially from the No Build condition.

The changes in access at Pennsylvania Street and Meridian Street/Delaware Street are a trade-off to minimize the footprint of the roadway, which was an expressed desire of the local communities. The resulting changes in travel patterns and access are expected to affect both EJ and non-EJ populations. The public survey indicated that populations of EJ concern travel on I-65, I-70, and the local street network more frequently than non-EJ populations. However, the overall impacts to travel time and access for populations of EJ concern are anticipated to be minor.

The project will eliminate the weaving sections on the west leg of the system interchange near the Pennsylvania and Delaware Street ramps, which will improve traffic flow by removing the most severe bottlenecks in the project area. The project will also improve safety by addressing the top four crash sites in the project area. Populations of EJ concern may experience greater benefits from these improvements, because the public survey indicated they travel on I-65 and I-70 more frequently than non-EJ populations.

The project will incorporate pedestrian and bicycle features that will benefit populations of EJ concern. Pedestrian and bicycle facilities under existing bridges – such as greenways, sidewalk connections, and on-street bicycle lanes – will be maintained or enhanced. The project will enhance pedestrian and bicycle safety and mobility by providing wider bridge openings, installing new lighting under the bridges, and building wider sidewalks.

The project will temporarily impact populations of EJ concern through construction-related vehicle emissions, dust, noise, and vibration. These temporary construction impacts will be mitigated by following INDOT Standard Specifications and implementing a Vibration Monitoring and Control Plan. Construction activities will also impact traffic operations for populations of EJ concern. Potential lane restrictions, closures, and detours may cause delays and/or additional travel times for local and regional travelers, school buses, emergency responders, transit buses, pedestrians, and bicycles. Temporary impacts to traffic operations will be minimized through the implementation of the MMP and a Traffic Incident Management Plan during construction.

A disproportionately high and adverse effect is defined as one that is:

- Predominantly borne by a low-income population and/or a minority population; or
- Suffered by the low-income population and/or minority population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-low-income and/or non-minority population

The temporary and permanent impacts to populations of EJ concern are not anticipated to be greater or more severe in magnitude than those borne by non-EJ populations. Populations of EJ concern have been – and will

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continue to be – provided full and fair participation in the transportation decision-making process. Several mitigation measures will be incorporated into the project to reduce adverse effects. Therefore, the North Split Project will not result in a disproportionately high and adverse effect to low-income and/or minority populations. Additional detail regarding the EJ analysis is provided in the Environmental Justice Technical Memorandum (Appendix K, pages 1-224).

With the information provided, INDOT Environmental Services would not consider the impacts associated with this project as causing a disproportionately high and adverse effect on minority and/or low-income populations of EJ concern relative to non EJ populations in accordance with the provisions of Executive Order 12898 and FHWA Order 6640.23a. INDOT will continue public outreach activities after the NEPA process is complete to inform the public of maintenance of traffic changes and provide updates during construction.

Should the scope of work or amount of right-of-way change, INDOT ES should be contacted immediately to determine if the EJ Analysis would need to be reinitiated.

**Relocation of People, Businesses or Farms**

Will the proposed action result in the relocation of people, businesses or farms?  
 Is a Business Information Survey (BIS) required?  
 Is a Conceptual Stage Relocation Study (CSRS) required?  
 Has utility relocation coordination been initiated for this project?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Number of relocations: Residences: 0 Businesses: 0 Farms: 0 Other: 0

*If a BIS or CSRS is required, discuss the results in the remarks box.*

Remarks: No relocations of people, businesses, or farms will take place as a result of this project. Utility coordination has started and utilities are preparing work plans for any necessary relocations.

**SECTION H – HAZARDOUS MATERIALS & REGULATED SUBSTANCES**

**Hazardous Materials & Regulated Substances** (Mark all that apply)

Red Flag Investigation  
 Phase I Environmental Site Assessment (Phase I ESA)  
 Phase II Environmental Site Assessment (Phase II ESA)  
 Design/Specifications for Remediation required?

Documentation

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

	No	Yes/ Date
<b>ES Review of Investigations</b>	<input type="checkbox"/>	RFI/IDEM VFC Review – May 21, 2019 Subsurface Investigation Report – September 3, 2019

*Include a summary of findings for each investigation.*

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Remarks:

### **Red Flag Investigation**

Based on a review of GIS and available public records, an RFI was completed by HNTB (Appendix E, pages 1-57) and finalized on May 21, 2019. According to the RFI, the following hazardous materials sites are located within 0.5 mile of the project area:

- 33 Resource Conservation and Recovery Act (RCRA) Generator/Treatment, Storage, and Disposal (TSD) Facilities
- 20 State Cleanup Sites
- 83 Underground Storage Tank (UST) Sites
- 8 Voluntary Remediation Program sites
- 1 Infectious/Medical Waste Site
- 45 Leaking Underground Storage Tank (LUST) Sites
- 2 Manufactured Gas Plants
- 92 Brownfield Sites
- 80 Institutional Control Sites
- 22 National Pollutant Discharge Elimination System (NPDES) Facilities
- 15 NPDES Pipe Locations

### **IDEM VFC Review**

Based on a review of the IDEM Virtual File Cabinet (VFC), 15 sites were identified that had recommendations for either additional coordination, having the potential for soil and/or groundwater contamination extending into the project area, or recommended a Phase II Environmental Site Assessment (ESA) to establish worker safety and proper handling, transport, and disposal of potentially contaminated media. The site numbers and associated details are available in Appendix E, pages 15-54. All necessary recommendations required to address worker safety and/or appropriate handling and disposal needs are included as firm project commitments in *Section J – Environmental Commitments* of this document.

- Site 109: State Cleanup Program – Greg Heendel Real Estate (1202 N. Pennsylvania Street)
- Site 115: UST Site – Collins Leasing (1011 N. Pennsylvania Street)
- Site 118: Brownfield/Institutional Control Site – Frank E. Irish Incorporated/Park Avenue Church of Christ (625 E. 11<sup>th</sup> Street and 620 E. 10<sup>th</sup> Street)
- Site 206: Brownfield Site/RCRA Generator/Institutional Control Site – Tinker Flats/Big Four Metals, Inc. (1101 E. 16<sup>th</sup> Street)
- Site 210: Brownfield Site/Institutional Control Site – Star Laundry & Drycleaners (1251/1245 Roosevelt Avenue and 1231-1245 Roosevelt Avenue)
- Site 211: State Cleanup Program/Voluntary Remediation Program/Brownfield/RCRA Generator Site – R & E Realty/Circle City Industrial Complex (1125 Brookside Avenue)
- Site 217: Brownfield Site – Precision Piston Range (1417 Commerce Avenue)
- Site 243: RCRA Generator/Brownfield Site – Zimmer Paper Products (1420 E. 20<sup>th</sup> Street)
- Site 244: Voluntary Remediation Program/Brownfield Site – Threaded Rod (1929 Columbia)
- Site 403: UST/LUST/Brownfield/Institutional Control/NPDES Facility – Plant #2, Mitchel & Scott Machining Co. (627/727 N. College Ave)
- Site 407: UST Site – Midland Arts & Antique Market (907 E. Michigan Street)
- Site 411: UST/Voluntary Remediation Program Site – Progress Linen (711 E. Vermont Street)
- Site 413: UST Site – Wholesale TV (231 N. College Avenue)
- Site 420: UST Site – Salvation Army (711 E. Washington Street)
- Site 434: Brownfield/State Cleanup Site – IPS Service Center (901 N. Carrolton Avenue)

Two meetings were held with INDOT and IDEM's Office of Land Quality regarding possible hazardous materials sites, on July 8, 2019 and July 18, 2019. The meetings occurred in order to determine if there were any additional sites or environmental concerns that were not identified in the RFI and discuss the proposed scope of work for the Phase II Environmental Site Assessment (ESA). (Appendix E, pages 58-59).

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### **Subsurface Investigation Report**

Based on the presence of hazardous material sites that could affect the project area, ATC completed a Subsurface Investigation Report for the project area on September 3, 2019 (Appendix E, pages 60-99). Areas of known contamination that were identified within the RFI were not included in this subsurface investigation. Soil and groundwater sampling were completed where construction activities are anticipated to include trenching, excavation, or drilling. The initial design concept for the roadway improvements provided zones of potential construction locations and estimated depths of excavation; however, the exact locations and depths of construction activities is not fully known at this time, due to the design-build nature of the project. A preliminary review of potential subsurface conditions was deemed necessary to assist with project and cost development. The collection of soil and groundwater data within the project area will be utilized to identify contaminants of concern (COCs) in the subsurface in order to evaluate potential worker exposure and assist in the projects needs of management of soil and/or groundwater generated during construction.

### **Soil Summary and Recommendations**

Results of the analysis performed on soil samples collected during the subsurface investigation indicated that concentrations of cadmium were detected at a concentration above the IDEM Remediation Closure Guide (RCG) screening levels (SLs) in the temporary monitoring well DB-6 from the 78-80 feet-below ground surface (bgs) interval. Lead and mercury were detected at concentrations above the IDEM RCG SLs in the temporary monitoring well GP-19 from the 0-2 feet- bgs interval. Additionally, concentration of naphthalene was detected above the IDEM RCG SLs from samples collected from temporary monitoring wells DB-1 (0-2 feet-bgs), DB-3 (78-80 feet-bgs), and DB-6 (78-80 feet-bgs). The remaining analyses did not result in concentrations above the IDEM RCG SLs or laboratory detection limits.

Based on the results, the potential for exposure from direct contact with soil containing elevated concentrations of COCs does not appear to be greater than would be encountered during typical construction projects. The concentration of naphthalene discovered at the surface sample from temporary monitoring well DB-1 was detected at a level above the IDEM RCG SLs that requires notification of presence, but does appear to warrant further special handling, if localized. Verification of soil conditions in the vicinity of these locations should be implemented during excavation activities. A competent person should screen the soil while working in the area. Communication of the conditions, dust control, field screening, soil management, and sample collection may be required to protect workers and ensure proper handling, based on the competent person's assessment while working in this area.

Mercury and lead containing surface soil in the immediate vicinity of temporary monitoring well GP-19 was discovered in concentrations that exceed the IDEM RCG SLs (Appendix E, page 95). The concentrations identified were high enough that if the area is to be disturbed, then additional provisions, including soil sampling to delineate the extent of the elevated concentrations of mercury, will need to be implemented. The removal and disposal of the soil will need to be defined and sampled to characterize the nature and extent of the concentrations within the constraints of the roadway construction activities to be completed in that location. This data will be required to determine requirements for proper handling and disposal of the soil.

Furthermore, concentrations of lead were identified at multiple locations that exceeded 100 mg/kg, which is not above the IDEM RCG SLs; however, it is above the RCRA Toxicity Characteristic Leaching Procedure (TCLP) 20X rule. Temporary well locations DB-1, DB-8, GP-12, GP-19, and GP-20 identified lead above the criteria stated above (Appendix E, page 95). If soil is to be disposed of from the vicinity of these locations, the soil will need to be containerized and sampled for waste disposal parameters (i.e. a minimum of TCLP lead and anything additional that may be required by the selected disposal facility). Based on the limited data collected, the lead concentrations do not appear to limit the excavation and reuse of the soil in these areas. Best practices such as dust control measures should be implemented to minimize the potential of exposure to surface lead concentrations during construction activities. There was also an elevated detection of cadmium in soil from temporary monitoring well DB-6 (78-80 feet-bgs). Based on the depth of this exceedance, it is unlikely to be unearthed and become a concern; however, if soil from this depth is encountered, the above provisions should be implemented. The limited scope of this investigation does not account for all potential exposure pathways to workers nor to all contaminants. When a concern or change in condition is observed during any activity, work will stop and the situation assessed to protect against

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exposure or mishandling of contaminated materials.

### Groundwater Summary and Recommendations

Results of the analysis performed on groundwater samples collected during the subsurface investigation indicate elevated total metal detections in the groundwater samples collected across the project area. Based on the sampling methodology, (i.e. grab samples from within the augers and temporary monitoring wells) the collection also included the analysis of dissolved metals following laboratory filtering of the samples to remove suspended sediment (turbidity). Thus, the results indicate that levels of the metals analyzed were below the applicable IDEM RCG SLs. Uranium was not included in the filtered dissolved metals analysis, but levels are inferred to also be biased high due to sediment based on this investigation. Additionally, the remaining groundwater COCs analyzed did not result in concentrations that exceeded the IDEM RCG SLs or were below laboratory detection limits.

Several properties with environmental concerns were identified with elevated chlorinated solvent concentrations in groundwater in the RFI/IDEM VFC review. The residual concentrations, based on data reviewed on the IDEM VFC, are relatively low level, but groundwater in this area will require containerization and proper handling, if encountered. Therefore, provisions for the management of this material will need to be implemented if saturated soil or groundwater (dewatering) will be brought to the surface during construction activities in this area. A competent person should manage materials extracted from depth in this area. Communication of the conditions, containment of the liquids, controls to prevent runoff of extracted groundwater onto the surface, and sample collection at a minimum may be required to protect workers and ensure proper handling. Site conditions near the soil boring locations have been assumed to be consistent with the results of the investigation across the working area. However, if conditions are encountered during subsurface activities that appear to be a concern then, as above, a stop work and assessment of the situation should be implemented to protect against exposure or mishandling of contaminated materials.

Personnel who may be exposed to hazardous substances are required to be Hazardous Waste Operations and Emergency Response (HAZWOPER 29 CFR 1920.120) trained; if they meet any of the following conditions:

- Engaged in clean-up operations at an uncontrolled waste site (forced or voluntary),
- Implementing corrective actions covered by RCRA,
- Perform operations involving hazardous waste which are conducted at treatment, storage and disposal facilities, and
- Emergency response operations for releases of, or substantial threats of release of, hazardous substances.

### Oil and Gas

An early coordination letter was sent to the IDNR Division of Oil and Gas on October 18, 2017 (Appendix C, pages 1-6). In their early coordination email dated October 20, 2017, IDNR Division of Oil and Gas indicated that there are two wells located in or near the project area (Appendix C, page 19). However, based on the RFI map (Appendix E, page 13) and well coordinates, they appear to be the same well and it is outside of the project area. According to the IDNR email, one well is mapped near Louisiana Street and Bates Street, one block west of I-65/I-70. The well cannot be seen from the surface and would only be impacted while excavating. There is a second well mapped at the southwest side of College Avenue and Bates Street. This well is mapped outside of the project area. It is presumed to be a dry hole and to be plugged. Careful excavation is recommended in/near these areas. There are also likely test holes in the area. If a metal cast iron casing sitting horizontally in the ground or metal cast iron pipes are observed during construction, the IDNR Division of Oil and Gas should be contacted immediately. This commitment is included in *Section J – Environmental Commitments* of this document.

### Lead-based Paint and Asbestos on Bridges

According to INDOT inspection reports, some bridges within the project area contain asbestos. The removal, testing, transportation, or disposal of asbestos shall be in accordance with INDOT Standard Specifications and all applicable Federal, State, and local laws, regulations, and rules.

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The bridges may contain lead-based paint. The removal, testing, transportation, or disposal of asbestos shall be in accordance with INDOT Standard Specifications and all applicable Federal, State, and local laws, regulations, and rules. When paint is identified on a bridge, regardless of surface (i.e. metal, concrete, etc.), the paint will be evaluated on the first day of the paint removal operation to determine if lead is present. Paint samples will be collected by a qualified environmental professional and contained in accordance with INDOT Standard Specifications. The paint samples will be analyzed for both total lead and Toxicity Characteristic Leaching Procedure (TCLP) lead using USEPA SW Method 6010. This analysis will determine if lead is present and will assist in determining proper removal and disposal methods. In general, a TCLP lead result less than 5 ppm (mg/L) indicates the material can be disposed of at a RCRA Subtitle C solid waste landfill. A TCLP result at or above 5 ppm (mg/L) is considered hazardous waste. The laboratory analytical results shall be used by the design-build team to confirm appropriate bridge paint handling, transport, and disposal methods that comply with Federal and State requirements.

In accordance with the INDOT Standard Specifications, all efforts should be made to minimize human and environmental exposure to lead-based and lead containing paint chips and dust. Construction workers will be protected in accordance with Occupational Safety and Health Administration (OSHA) requirements. The design-build team will be required to provide proper personal protective equipment to the level as determined by the sampling and monitoring requirements.

**SECTION I – PERMITS CHECKLIST**

Permits (mark all that apply) Likely Required

<b>Army Corps of Engineers (404/Section10 Permit)</b>	
Individual Permit (IP)	<input type="checkbox"/>
Nationwide Permit (NWP)	<input type="checkbox"/>
Regional General Permit (RGP)	<input checked="" type="checkbox"/>
Pre-Construction Notification (PCN)	<input type="checkbox"/>
Other	<input type="checkbox"/>
Wetland Mitigation required	<input type="checkbox"/>
Stream Mitigation required	<input type="checkbox"/>
<b>IDEM</b>	
Section 401 WQC	<input checked="" type="checkbox"/>
Isolated Wetlands determination	<input checked="" type="checkbox"/>
Rule 5	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/>
Wetland Mitigation required	<input type="checkbox"/>
Stream Mitigation required	<input type="checkbox"/>
<b>IDNR</b>	
Construction in a Floodway	<input type="checkbox"/>
Navigable Waterway Permit	<input type="checkbox"/>
Lake Preservation Permit	<input type="checkbox"/>
Other	<input type="checkbox"/>
Mitigation Required	<input type="checkbox"/>
<b>US Coast Guard Section 9 Bridge Permit</b>	<input type="checkbox"/>
<b>Others (Please discuss in the remarks box below)</b>	<input checked="" type="checkbox"/>

Remarks: In an email dated September 17, 2019, the INDOT Ecology and Waterway Permitting Office provided a preliminary permit determination for the project (Appendix F, page 32). The project will require an IDEM Rule 5 Notice of Intent because there will be greater than one acre of ground disturbance, and a USACE Section 404 Permit and an IDEM Section 401 Permit for impacts to wetlands. Mitigation for wetlands will not be required because impacts do not exceed the mitigation threshold of 0.1 acre.

Coordination with the INDOT Office of Aviation determined an Indiana Tall Structure permit and a FAA

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permit will be required for the project (Appendix C, pages 22-26).
A City of Indianapolis Flora Permit and Right-of-Way Permit, and Indianapolis Historic Preservation Commission Certificate of Appropriateness may also be required for the project.
Applicable recommendations provided by IDEM, IDNR, and the INDOT Office of Aviation are included in Section J - Environmental Commitments section of this document. If permits are found to be necessary, the conditions of the permit will be requirements of the project and will supersede these recommendations.
It is the responsibility of the project sponsor to identify and obtain all required permits.

SECTION J- ENVIRONMENTAL COMMITMENTS

The following information should be provided below: List all commitments, name of agency/organization requesting the commitment(s), and indicating which are firm and which are for further consideration. The commitments should be numbered.

Remarks:

- Firm:
1. If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division (ESD) and the INDOT District Environmental Section will be contacted immediately. (INDOT ESD)
2. It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access. (INDOT ESD)
3. Any work in a wetland area within right-of-way or in borrow/waste areas is prohibited unless specifically allowed in the U.S. Army Corps of Engineers permit. (INDOT ESD)
4. Wetlands M and N shall be avoided by all project activities. Wetlands M and N shall be marked as "Do Not Disturb" on the project plans. Construction fencing shall be installed and maintained around the boundaries of Wetlands M and N prior to construction. (INDOT ESD)
5. To minimize impacts to the state endangered Kirtland's snake, a silt fence shall be installed and maintained around any construction areas where ground disturbance will occur. (IDNR DFW)
6. An Indiana Tall Structure permit and FAA permit will be required for the project. James Kinder, Program Manager at the INDOT Office Aviation, shall be cc'd on all coordination with the FAA. (INDOT Aviation)
7. If a metal cast iron casing sitting horizontally in the ground or metal cast iron pipes are observed during construction, IDNR Division of Oil and Gas shall be called within 24 hours. (DNR Division of Oil & Gas)
8. The Indianapolis Cultural Trail (except the Payne Connection) shall remain open during construction, and access will not be impacted. (INDOT ESD)
9. A 90-foot section of Pogue's Run Trail east of the Monon Trail along 10th Street shall not be closed more than three months during construction. The closure duration shall be temporary, i.e., less than the time needed for construction of the project, and there shall be no change in ownership of the land. (INDOT ESD)
10. The Pogue's Run Trail shall be fully restored, i.e., the property shall be returned to a condition which is at least as good as that which existed prior to the project. (INDOT ESD)
11. A detour of the Monon Trail will be constructed. The detour will follow the Old Northside Trail for approximately 870 feet, then it will require construction of a trail that will continue west/southwest for approximately 600 feet within the interchange right-of-way and join College Avenue. The trail will continue south along the east side of College Avenue. Approximately 200 feet north of the intersection of College Avenue and 11th Street, a temporary multiuse path will be constructed within INDOT right-of-way east of College Avenue to connect to 10th Street. The entire detour route will be constructed within existing INDOT or City right-of-way, shall be 12-feet wide, and will be compliant with the ADA. Either the Monon Trail or the constructed detour must be open to trail users at all times. (INDOT ESD)
12. The portions of the trail from the Monon Trail to College Avenue and south along College Avenue

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- shall remain a permanent feature, pending a maintenance agreement from the City. (INDOT ESD)
13. Trail nodes shall be constructed at the intersection of the Monon Trail and the detour trail, where the detour makes a 90-degree turn at College Avenue, and where the trail turns southeast from College Avenue. The trail nodes shall be constructed in accordance with the Indy Greenways Design Standards. (INDOT ESD)
  14. Construction work within the Frank and Judy O'Bannon Old Northside Soccer Park is limited to the reconstruction of the Old Northside Trail for the Monon Trail detour and permanent trail. No other construction or staging activities will occur in the Park. (INDOT ESD)
  15. If closure of both the Monon Trail and the prescribed pedestrian/bicyclist detour are required, the design-build team shall provide a short-term temporary detour for bicyclists and pedestrians of no more than three consecutive days. A short-term detour can only be used two times per year and must have written approval from INDOT and the City of Indianapolis. (INDOT ESD)
  16. The public art sculptures, lanterns, and signs that are currently located along the Payne Connection shall be removed and stored during construction. The public art sculptures, lanterns, and signs shall be reinstalled once the interstate bridges have been constructed. Coordination with the Near East Area Renewal (NEAR) shall occur prior to re-installation of these features to determination their locations within the Payne Connection. (INDOT)
  17. The project elements shall be designed in accordance with the North Split Aesthetic Design Guidelines. (INDOT)
  18. Reconstructed bridges over local streets shall be built with a span equal to or greater than the existing span. Minimum local street requirements are listed in Table 1. (INDOT)

**Table 1. Minimum Local Street Requirements**

Local Street	Buffer Width	Sidewalk/Bike Path	Wall/Pier Offset
Washington Street	3 feet	12 feet	2 feet
Market Street	3 feet	10 feet	2 feet
New York Street	3 feet	10 feet	2 feet.
Vermont Street	3 feet	10 feet	2 feet
Michigan Street	3 feet	12 feet	2 feet
St. Clair Street	8 feet	10 feet	2 feet
10th Street	8 feet	12 feet	2 feet
Central Avenue	3 feet	12 feet	2 feet
College Avenue	8 feet	12 feet	2 feet

19. INDOT will develop and implement a Traffic Incident Management Plan in cooperation with law enforcement and emergency responders from throughout the region. (INDOT)
20. Eliminating the Meridian/Delaware Street entrance ramp to southbound I-65 and the C-D road will create a partial interchange, which is typically avoided by FHWA since some motorists are unable to reenter at the same location. To address these concerns, wayfinding signage will be provided to indicate alternative routes to enter I-65. (INDOT)
21. The concentration of naphthalene discovered at the surface sample from temporary monitoring well DB-1 was detected at a level above the IDEM RCG SLs that requires notification of presence, but does not appear to warrant further special handling, if localized. Verification of soil conditions in the vicinity of these locations shall be implemented during excavation activities. A competent person shall screen the soil while working in the area. Communication of the conditions, dust control, field screening, soil management, and sample collection may be required to protect workers and ensure proper handling, based on the competent person's assessment while working in this area. (INDOT SAM)
22. Mercury and lead containing surface soil in the immediate vicinity of temporary monitoring well

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- GP-19 was discovered in concentrations that exceed the IDEM RCG SLs. The concentrations identified were high enough that if the area is to be disturbed, then additional provisions, including soil sampling to delineate the extent of the elevated concentrations of mercury, will need to be implemented. The removal and disposal of the soil will need to be defined and sampled to characterize the nature and extent of the concentrations within the constraints of the roadway construction activities to be completed in that location. This data will be required to determine the requirements for proper handling and disposal of the soil. (INDOT SAM)
23. Concentrations of lead were identified at multiple locations that exceeded 100 mg/kg, which is not above the IDEM RCG SLs; however, it is above the RCRA Toxicity Characteristic Leaching Procedure (TCLP) 20X rule. These temporary well locations DB-1, DB-8, GP-12, GP-19, and GP-20 identified lead above the criteria stated above. If soil is to be disposed of from the vicinity of these locations, the soil will need to be containerized and sampled for waste disposal parameters (i.e. a minimum of TCLP lead and anything additional that may be required by the selected disposal facility). Based on the limited data collected, the lead concentrations do not appear to limit the excavation and reuse of the soil in these areas. Best practices such as dust control measures, etc., should be implemented to minimize the potential of exposure to surface lead concentrations during construction activities. (INDOT SAM)
  24. There was an elevated detection of cadmium in soil from temporary monitoring well DB-6 (78-80 feet-bgs). Based on the depth of this exceedance, it is unlikely to be unearthed and become a concern; however, if soil from this depth is encountered, the provisions (from commitment No. 24 above) should be implemented. (INDOT SAM)
  25. Several properties with environmental concerns were identified with elevated chlorinated solvent concentrations in groundwater in the RFI/IDEM VFC review. The residual concentrations, based on data reviewed on the IDEM VFC, are relatively low level, but groundwater in this area will require containerization and proper handling, if encountered. Therefore, provisions for the management of this material will need to be implemented if saturated soil or groundwater (dewatering) will be brought to the surface during construction activities in this area. BMPs shall be implemented for dewatering activities in this area. Communication of the conditions, containment of the liquids, controls to prevent runoff of extracted groundwater onto the surface, and sample collection at a minimum may be required to protect workers and ensure proper handling. (INDOT SAM)
  26. The limited scope of the subsurface investigation that was conducted for this project does not account for all potential exposure pathways to workers nor to all contaminants. When a concern or change in condition is observed during any activity, a stop work and assessment of the situation should be implemented to protect against exposure or mishandling of contaminated materials. (INDOT SAM)
  27. Personnel who may be exposed to hazardous substances are required to be Hazardous Waste Operations and Emergency Response (HAZWOPER 29 CFR 1920.120) trained; if they meet any of the following conditions: (1) Engaged in clean-up operations at an uncontrolled waste site (forced or voluntary), (2) Implementing corrective actions covered by RCRA, (3) Perform operations involving hazardous waste which are conducted at treatment, storage and disposal facilities, and (4) Emergency response operations for releases of, or substantial threats of release of, hazardous substances. (INDOT SAM)
  28. If groundwater monitoring wells are encountered in the project area, they will be maintained in place if feasible. If they cannot be maintained, the design-build team must contact the INDOT Project Manager who will notify the INDOT Right-of-way Permits Group. The INDOT Right-of-way Permits Group will notify the permit holder that the well must be removed prior to construction. The permit holder is responsible for coordination with IDEM and the INDOT Right-of-way Permits Group for replacement or relocation of the well. If a property owner cannot be found in connection with the monitoring well, then well abandonment will be included in the project contract. All well abandonment activities must be completed by an Indiana Licensed Well Driller in accordance with IAC 312-13-10. Regardless of whether the well is abandoned by the design-build team or the property owner, a record of well abandonment, including the well driller's license number, must be provided to the INDOT Project Manager once the well has been abandoned. (INDOT SAM)

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29. The portions of archaeology site 12-Ma-1062 that lie outside the proposed project area should be clearly marked so that they are avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the DHPA for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archaeology and Historic Preservation" (48 F.R. 44716). (INDOT CRO)
30. FHWA and INDOT shall ensure project elements, including tree and vegetation plantings, are designed in accordance with the North Split Project Aesthetic Design Guidelines. Minor modifications may be made if approved by FHWA and INDOT as long as they are within the spirit of the Aesthetic Design Guidelines. (INDOT CRO)
31. FHWA and INDOT and/or its consultants shall provide a draft landscape and side slope plan (including scaled cross sections for each adjacent historic district) for consulting party review and comment at two points during the design process. (INDOT CRO)
  - a. Comment periods will be 30 days.
  - b. The first comment period will be for an initial review and comment.
  - c. The second comment period will be to show how comments were addressed, allow comments on revisions, and solicit input regarding any remaining questions.
  - d. FHWA and INDOT shall make a good faith effort to address comments and shall provide responses regarding how or why comments were addressed or not addressed.
  - e. FHWA and INDOT shall have one consulting party meeting within each comment period to provide information and solicit feedback from consulting parties.
  - f. FHWA and INDOT shall have at least one neighborhood meeting within each comment period to solicit feedback from adversely affected historic districts. Residents of the Old Northside, Saint Joseph, and Chatham-Arch neighborhoods shall be the focus of the neighborhood meetings; however, the meetings will be open to the general public.
  - g. FHWA shall have the authority for final approval of actions regarding the implementation of aesthetic and landscaping measures.
32. Berms shall be included in the interchange design to provide visual shielding and noise reduction from the interchange ramps for the Old Northside and Chatham-Arch Historic Districts. (INDOT CRO)
  - a. The berms shall be located in the northwest quadrant of the interchange, extending from approximately 14<sup>th</sup> Street to College Avenue, and in the southwest quadrant of the interchange, extending from College Avenue to 10<sup>th</sup> Street.
  - b. The berms shall be sculpted into a softer, more natural shape and planted with trees such that they do not appear as abandoned "roadbeds". The proposed shape of the berms shall be included in the draft landscape and side slope plan provided to consulting parties for comment.
  - c. All other remnants of previous "roadbed" use shall be removed from areas that will no longer serve such a use, including those adjacent to the O'Bannon Soccer Park.
33. INDOT shall develop a landscape maintenance plan for three years after tree and shrub planting. (INDOT CRO)
34. INDOT shall engage Keep Indianapolis Beautiful, Inc. as a landscape advisor to provide recommendations and/or services for tree and shrub planting, monitoring, and maintenance for three years after planting. (INDOT CRO)
35. INDOT shall replace trees and shrubs that do not survive during the first three years after planting. INDOT shall monitor planted trees and shrubs annually for three years. If dead trees or shrubs are identified during each annual monitoring, they will be replaced. If the replacement plant dies, it shall be replaced with a substitute species approved by INDOT. (INDOT CRO)
36. INDOT shall identify "Do Not Disturb" areas within the project limits in order to preserve existing trees. The "Do Not Disturb" areas shall be marked with silt fence and signage. The only work that can occur in "Do Not Disturb" areas is the installation new drainage connections (to existing pipes). No clearing of trees 2-inch diameter at breast height (dbh) or greater shall be allowed in the "Do Not Disturb" areas. The "Do Not Disturb" areas shall be at the following locations: (INDOT CRO)

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- a. Within the existing right-of-way of northbound I-65 adjacent to the Old Northside Historic District and Morris Butler House from College Avenue to Alabama Street. INDOT shall identify a work zone, where construction can occur, which extends 15 feet north of the proposed retaining wall within this area. Vegetation within the existing right-of-way north of that shall be in the "Do Not Disturb" area.
  - b. Portions of the existing right-of-way of southbound I-65 where groups of mature trees are present, adjacent to the Saint Joseph Neighborhood and Chatham-Arch Historic Districts from College Avenue to Delaware Street.
  - c. Portions of the existing right-of-way of southbound I-65/westbound I-70 where trees have been planted, adjacent to the Lockerbie Square Historic District from Michigan Street to New York Street.
37. If trees within the "Do Not Disturb" areas do not survive within one year of the conclusion of construction activity within fifteen feet of the area, INDOT shall plant replacement trees, at 2-inch dbh or greater in size, at a ratio of three to one (three replacement trees for each tree that does not survive). The replacement trees shall be planted in the "Do Not Disturb" areas if space allows or within INDOT right-of-way within the project area. (INDOT CRO)
38. Outside of the "Do Not Disturb" areas, INDOT shall plant shrubs and trees (if appropriate for the slope and location) at the following locations: (INDOT CRO)
- a. Within the 15-foot work zone north of I-65 northbound from College Avenue to Alabama Street.
  - b. The side slope of southbound I-65 between Alabama Street and College Avenue.
  - c. If the existing vegetation is removed during construction, along the western side slope of I-65/I-70 south of the interchange from 10<sup>th</sup> Street south to St. Clair Street.
39. INDOT shall plant trees 2-inch dbh or greater in size. This includes trees both in and out of the "Do Not Disturb" areas. (INDOT CRO)
40. FHWA and INDOT shall ensure project elements, including underpass treatments, are designed in accordance with the North Split Project Aesthetic Design Guidelines. Minor modifications may be made if approved by FHWA and INDOT as long as they are within the spirit of the Aesthetic Design Guidelines. (INDOT CRO)
41. FHWA shall have the authority for final approval of actions regarding the implementation of aesthetic and landscaping measures. (INDOT CRO)
42. To improve connectivity between adversely affected historic districts, INDOT shall make the following connectivity improvements: (INDOT CRO)
- a. Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Alabama Street underpass shall include new lighting on the bridge, sidewalk pavers, and signage along Alabama Street identifying each neighborhood. Coordination shall occur with the Old Northside and Saint Joseph neighborhoods regarding their established logos and sign standards.
  - b. Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Central Avenue underpass shall include a wider bridge opening (65 feet to at least 76 feet), wider sidewalks, sidewalk pavers, new lighting with upgraded fixtures on the bridge, vertical bridge walls, elimination of drainage from the bridge above on to the street and sidewalks, and space for murals.
  - c. Between the Old Northside and Chatham-Arch Historic Districts, improvements to the College Avenue underpass shall include wider bridge openings (79 feet to at least 87 feet), wider sidewalks, sidewalk pavers, new lighting with upgraded fixtures on the bridge, vertical bridge walls, elimination of drainage on to the street and sidewalks, and space for murals.
43. INDOT shall provide \$190,000 to the Benjamin Harrison Presidential Site towards the construction of the Old Northside Connector, a pedestrian and bicycle path to connect the alley south of the Benjamin Harrison Presidential Site to Pennsylvania Street. This stipulation will be implemented through an agreement between INDOT and the Benjamin Harrison Presidential Site. (INDOT CRO)
44. INDOT shall construct a temporary detour for the Monon Trail during construction. The portion of

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- the detour within the O'Bannon Soccer Park and within INDOT right-of-way west to College Avenue and under the College Avenue bridges will remain as a permanent feature to improve connectivity between the Old Northside and Chatham-Arch Historic Districts. (INDOT CRO)
45. INDOT shall construct a temporary detour for the Monon Trail during construction. INDOT shall work with the City of Indianapolis to determine if the portion of the detour southwest of the interchange from College Avenue southeast to 10<sup>th</sup> Street can remain as a permanent feature to improve connectivity for the Chatham-Arch Historic District. Retaining this trail as a permanent feature is conditional upon INDOT reaching an agreement with the City of Indianapolis. The final decision shall be communicated to consulting parties. (INDOT CRO)
  46. INDOT shall install "No Construction Traffic" and "Local Traffic Only" signs at the entrance to the brick portion of 10<sup>th</sup> Street from Delaware Street to Central Avenue to protect the brick portion of 10<sup>th</sup> Street from construction traffic. (INDOT CRO)
  47. INDOT and its design-build team shall avoid the limestone curbs and street trees along 12<sup>th</sup> Street, north of I-65 northbound, during all construction activities. If damage occurs to the limestone curbs as a result of the North Split Project construction, INDOT shall repair the limestone curbs. (INDOT CRO)
  48. To avoid damage to historic properties, INDOT shall ensure that a Construction Vibration Monitoring and Control Plan ("Plan") is developed by the design-build team prior to beginning any construction activities. The Plan shall at least include all buildings within historic properties or districts within 140 feet of project construction activities. The Plan will include the following key elements: (INDOT CRO)
    - a. The Plan will include the following key elements:
      - i. Identifying buildings that are sensitive to vibration;
      - ii. Conducting pre-construction surveys of residences, historic buildings, and other vibration-sensitive structures in the project corridor to determine the appropriate vibration limits for the type of structure and conditions of the structure;
      - iii. Developing and implementing a vibration monitoring program for construction activities; ensuring that, whenever vibration levels exceed the maximum thresholds identified in Table 2 below, construction work causing that vibration will immediately stop until such time as qualified professionals have determined that modifications have been made in the construction activities to assure that no damage shall occur to historic properties;
      - iv. Conducting post-construction surveys;
      - v. Phasing construction activities that create vibration so that multiple sources of vibration do not occur at the same time;
      - vi. Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours;
      - vii. Developing a method for responding to community complaints; and
      - viii. Keeping the public informed of proposed construction schedules, and identifying activities known to be a source of vibration.
    - b. Maximum thresholds for historic properties that shall not be exceeded are shown in Table 2. The values are presented in terms of peak particle velocity (PPV), the accepted method for evaluating the potential for damage.
    - c. INDOT and/or its consultants shall provide the draft Plan to the North Split consulting parties for a 30-day review period. INDOT shall respond to consulting party comments.
    - d. In the event vibration damage does occur as a result of the North Split Project construction activities (as evidenced by the pre- and post- construction surveys), INDOT shall ensure that the design-build team will be responsible for the cost and repair of any vibration damage to historic properties. Any repairs shall be coordinated with the Indiana SHPO to ensure they are carried out in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent

This is page 73 of 77 Project name: North Split Project Date: July 9, 2020

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- on property owners allowing pre and post construction surveys of their buildings.
- e. Where access to privately owned property is necessary for monitoring or damage repair, consent shall be obtained prior to entry.

**Table 2. Construction Vibration Thresholds (PPV)**

Type of Structure	Ground-borne Vibration Impact Level (PPV)
New Residential Structures	1.0 in/sec
Non-historic Older Residential Structures	0.5 in/sec
Fragile (non-engineered timber and masonry buildings)	0.20 in/sec
Extremely Fragile (buildings, ruins, ancient monuments)	0.12 in/sec

- 49. Non-highway use features not essential for highway travel in the INDOT right-of-way shall be permitted and approved (23CFR1.23(c)). The final design of the aesthetics features in the North Split Project must be submitted for final approval and permitted per INDOT's policy prior to construction. (INDOT)
- 50. The Construction Noise Abatement Plan will be sent to consulting parties for their information once it has been approved by INDOT. (INDOT)
- 51. INDOT will complete a Mobility Management Plan to manage traffic and reduce travel demand during construction of the North Split Project. (INDOT)
- 52. The stipulations of the Section 106 MOA shall be implemented as part of the North Split Project. (INDOT CRO)
- 53. Progress reports detailing implementation of the measures stipulated within this MOA and providing advanced notice of milestones, such as approval of design plans and initiation of construction activities, shall be submitted to signatories and concurring parties every six months, until all phases of the North Split Project are complete. The first progress report shall be distributed within six months following execution of this MOA. The progress reports shall identify the status of activities for each stipulation outlined in this MOA. (INDOT CRO)
- 54. A consulting party meeting will be held to inform consulting parties of the status of activities and evaluate compliance with the MOA within 30 days of distribution of each progress report. The consulting party meetings could be combined with those regarding review of the landscape and side slope plans. (INDOT CRO)
- 55. One round of four neighborhood meetings shall be held during the design process to show the results of the project design and CSS design elements. Neighborhoods invited during the CSS process will be invited to attend these meetings. (INDOT)
- 56. The brick portion of 10<sup>th</sup> Street from Central Avenue to Delaware Street shall not be used by construction vehicles or equipment, or signed for any local road detours by the Design-Build Team. (INDOT)
- 57. Between the Martindale-Brightwood and Windsor Park neighborhoods, improvements to the Commerce Avenue/Roosevelt Avenue underpass shall include new lighting on the bridge and new sidewalks. (INDOT)
- 58. If desired by the community, INDOT shall partner with Keep Indianapolis Beautiful to provide funding for a mural on the bridge columns at the Commerce Avenue/Roosevelt Avenue underpass. (INDOT)
- 59. INDOT will hold a meeting with the EJ Working Group prior to construction (after MOT plans are available from design-build team) to communicate MOT and construction impacts. Regular communications to the public will be provided while the construction work is underway. The project team will work with the EJ Working Group in developing a full and representative listing of

This is page 74 of 77 Project name: North Split Project Date: July 9, 2020

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contacts for these communications. (INDOT)

60. Public and consulting party comments regarding the Aesthetic Design Guidelines will be provided to the design-build team for consideration during final design. (INDOT)

**For Further Consideration:**

1. If there is additional impervious area over what is currently there, the project must consider the downstream capacity of the existing storm sewer system. (MCSWMD)
2. The project must comply with the *City of Indianapolis Storm Water Design and Construction Manual* including Chapter 700 for post-construction water quality requirements. (MCSWMD)
3. The project shall include sufficient temporary erosion and sediment control measures during all phases of construction. (MCSWMD)
4. Consider native plantings within the right-of-way. CORRIDORS (Conservation On Rivers and Roadways Intended to Develop Opportunities for Resources and Species) is a program to develop habitats for grassland-dependent species and to foster improved pollinator habitat along roadways and waterways. Program partners include INDOT, USDA NRCS, Pheasants Forever and Quail Forever. You may contact the South Region Landscape Biologist, Erin Basiger, at Deer Creek Fish & Wildlife Area, 2001 W. CR 600 South, Greencastle, IN. The new Urban Wildlife Program has potential cost-share and technical assistance available for native plantings and other urban habitat projects. You may contact the South Urban Biologist, Megan Dillon, at Atterbury Fish & Wildlife Area, 7970 S Rowe Street, Edinburgh, IN 46124, (812) 526-4891, mdillon@dnr.IN.gov, for information regarding assistance with establishment of pollinator habitat, trees and shrubs, native plugs, wetland habitat, rain gardens, nuisance Canada goose mitigation, and/or educational signage that could enhance the project area. (IDNR DFW)
5. Most transportation corridor designers and municipalities are trending toward LED lighting. Certain types of LED lighting can have negative impacts on both human and wildlife health and safety. The Division of Fish and Wildlife strongly encourages visiting the International DarkSky Association's website to learn more about the potential negative impacts of improperly selected LED lighting systems, if required: <http://darksky.org/lighting/led-practical-guide/>. (IDNR DFW)
6. Consider a more sustainable approach to stormwater management. The traditional model of stormwater management aims to drain urban runoff as quickly as possible with the help of channels and pipes, which increases peak flows and costs of stormwater management. A more sustainable approach aims to rebuild the natural water cycle by using storage techniques (retention basins, constructed wetlands, raingardens, etc.), recharging groundwater using infiltration techniques (infiltration basins or trenches, pervious pavement, etc.), and reusing runoff for irrigation elsewhere in the basin. (IDNR DFW)
7. Consider strategies to reduce diesel emissions, such as project construction/demolition contracts that require the use of equipment with clean diesel engines and the use of clean diesel fuels. (USPEA)
8. Use energy efficient lighting, including the use of solar powered lights when feasible. (USEPA)
9. Incorporate native saplings and shrubs into the landscape plan for the right-of-way, to help reduce noise, and maintain air quality for nearby residences and trail users. (USEPA)

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### SECTION K- EARLY COORDINATION

Please list the date coordination was sent and all agencies that were contacted as a part of the development of this Environmental Study. Also, include the date of their response or indicate that no response was received. INDOT and FHWA are automatically considered early coordination participants and should only be listed if a response is received.

Remarks: Early coordination letters were sent to resource agencies on October 18, 2017 (Appendix C, pages 1-6). If no response was received, it was assumed the agency did not feel the project will result in substantial impacts. Early notification letters were also sent to the City of Indianapolis MS4 Coordinators on October 19, 2017 (Appendix C, page 7).

The following agencies/individuals were contacted during the early coordination process:

	Agency	Date of Response
1.	USACE, Louisville District	No Response Received
2.	USEPA	November 20, 2017/October 24, 2018
3.	IDNR, Division of Fish and Wildlife	November 17, 2017
4.	USFWS, Bloomington Field Office	October 24, 2017
5.	USDA NRCS	October 19, 2017
6.	National Park Service, Midwest Regional Office	No Response Received
7.	U.S. Department of Housing and Urban Development	No Response Received
8.	Indiana Geological Survey (IGS) (electronic submission)	October 23, 2017
9.	INDOT, Office of Aviation	October 26, 2017
10.	IDEM (electronic submission)	October 19, 2017
11.	IDEM, Ground Water Section	October 24, 2017
12.	IDNR, Division of Outdoor Recreation	No Response Received
13.	IDNR, Division of Oil and Gas	October 20, 2017
14.	City of Indianapolis, Department of Public Works	October 24, 2017
15.	Marion County Surveyor's Office	November 1, 2017
16.	IndyGo	November 20, 2017
17.	Mayor, City of Indianapolis	No Response Received
18.	Indianapolis Department of Metropolitan Development (DMD)	No Response Received
19.	Indy Parks and Recreation	No Response Received
20.	Indianapolis Cultural Trail	No Response Received
21.	Keep Indianapolis Beautiful	No Response Received
22.	City-County Council of Marion County	No Response Received
23.	Indianapolis MPO	No Response Received
24.	City of Indianapolis, Department of Public Works (MS4)	October 24, 2017
25.	City of Indianapolis, NPDES PM (MS4)	October 24, 2017

The October 18, 2017 early coordination letter invited recipients to a resource agency meeting/WebEx on November 3, 2017, at the HNTB office. Representatives from INDOT, FHWA, USACE, USEPA, IDEM, IDNR, and Indianapolis DPW attended the meeting. The purpose of the meeting was to introduce the resource agencies to the North Split Project and identify any concerns they may have moving forward. Resource agency questions generally pertained to the design-build process, water resources, possible hazardous materials concerns, the EA schedule, air quality, MOT, pedestrian/bicycle connectivity, additional travel lanes, environmental justice, public involvement, pollinator habitat, adjacent land uses, relocations, and stormwater (Appendix C, pages 57-71).

An email was sent to regulatory agencies on April 24, 2018, informing them of the System-Level Analysis

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for downtown interstates and inviting them to a resource agency meeting/WebEx on May 22, 2018 at the Borshoff office (Appendix C, pages 72-73). The System-Level Analysis is not a formal step in the North Split NEPA process, but it was provided to resource agencies for informational purposes. Representatives from INDOT, FHWA, USACE, USEPA, USFWS, IDEM, IDNR, and Indianapolis DPW attended the meeting. The purpose of the meeting was to provide an overview of the System-Level Analysis. Resource agency questions generally pertained to traffic diversion, alternative concepts, stakeholder involvement, traffic modeling, and next steps with the project (Appendix C, pages 74-84).

An email was sent to regulatory agencies on September 28, 2018, providing the Alternatives Screening Report for review and inviting them to a resource agency meeting/WebEx on October 17, 2018 at the HNTB office (Appendix C, page 85). Representatives from INDOT, FHWA, USACE, USEPA, USFWS, and IDEM attended the meeting. The purpose of the meeting was to provide an overview of the purpose and need and alternative screening process. Resource agency questions generally pertained to alternative details, environmental justice, traffic impacts, transit, trails, and stormwater (Appendix C, pages 93-105). USEPA also provided comments on the Alternatives Screening Report in a letter dated October 24, 2018 (Appendix C, pages 89-92).

In addition to the resource agency meeting, a water resources field review was conducted with representatives from USACE and IDEM on October 22, 2019. The purpose of the meeting was to review water resources in the field in order to determine their jurisdictional status. IDEM provided a review of water resources from the field review on October 22, 2019 (Appendix F, page 34). USACE provided an approved jurisdictional determination for water resources on February 3, 2020 (Appendix F, pages 35-37).

A virtual resource agency meeting was held via WebEx on April 30, 2020. Representatives from INDOT, FHWA, USACE, USEPA, USFWS, IDNR, and IDEM participated in the meeting. The purpose of the meeting was to provide a project update, review possible traffic impacts during construction, and provide an overview of the Aesthetic Design Guidelines. Resource agency questions generally pertained to environmental justice, traffic impacts, landscaping, stormwater, and lighting (Appendix C, pages 106-132).

In addition to the resource agency meetings discussed above, there have been monthly meetings with the City of Indianapolis mayor's office, Indianapolis DPW, Indianapolis DMD, and the Indianapolis MPO to discuss the current project activities.

Although KIB and Indy Parks and Recreation did not provide formal early coordination responses, coordination has been ongoing with both agencies throughout the project. KIB has provided several responses as part of the Section 106 consultation process and Indy Parks and Recreation has provided input as part of the Section 4(f) evaluation process.

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FONSI REQUEST

ATTACHMENT B: PUBLIC INVOLVEMENT  
DOCUMENTATION



DES. # 1600808

**LEGAL NOTICE OF PUBLIC HEARING  
I-65/I-70 North Split Interchange Reconstruction in Marion County**

**The Indiana Department of Transportation (INDOT) will host a public hearing on August 3, 2020 at the Ivy Tech Community College Culinary and Conference Center, 2820 N. Meridian St., Indianapolis, IN 46208. Doors will open at 4:00 p.m. There will be presentations at 4:30 p.m. and 6 p.m. Parking is free for the public hearing. Social distancing guidelines will be followed. The capacity of each presentation is limited to 66 people to allow for social distancing. Project team members will wear face masks, and project exhibits will be spaced six feet apart. Hand sanitizer will be available, and attendees are required to wear face masks per the July 9 mandate by Marion County. Disposable face masks will be provided if attendees do not bring their own masks.**

The purpose of the public hearing is to offer all interested persons an opportunity to comment on the Environmental Assessment for the I-65/I-70 North Split Interchange Reconstruction in Indianapolis in Marion County. The purpose of the project is to rehabilitate and improve the existing interstate facilities leading to and through the I-65/I-70 North Split interchange in downtown Indianapolis. The needs for the project are correct deteriorated bridge conditions, correct deteriorated pavement conditions, improve safety, and improve interchange operations and reduce congestion.

As proposed, the project involves the reconstruction of the I-65/I-70 North Split Interchange and the interstate legs from the I-70 Valley Avenue bridge to the east, the I-65/I-70 and Washington Street interchange to the south (approximately 370 feet south of Washington Street), and the I-65 Alabama Street bridge (to Illinois Street along 11<sup>th</sup> and 12<sup>th</sup> Streets) to the west. Bridges throughout the project area will be rehabilitated or replaced. Pavement throughout the project area will be replaced. In order to minimize interstate widening and still meet the purpose and need of the project, some interstate access to and from downtown will be eliminated. Westbound traffic from I-70 will no longer be able to exit at the Pennsylvania Street ramp and traffic entering from the Delaware Street entrance ramp will no longer have access to the Collector-Distributor (C-D) road. The C-D road provides access to North Street, Michigan Street, Vermont Street, New York Street, Ohio Street, and Fletcher Avenue. The project will not require the acquisition of permanent new right-of-way or temporary right-of-way.

Construction of the project is anticipated to last for two years. The Maintenance of Traffic (MOT) plan for the project involves detouring through traffic on I-65 and I-70 around I-465. Access to all downtown exits and entrances outside the project area will be maintained during construction, including connections to Washington Street from I-65/I-70. Within the project area, I-65 and I-70 will be closed between Washington Street and the North Split during most of the construction period. The east-west I-65/I-70 connection across the north side of downtown, between Keystone Avenue/Rural Street and West Street interchanges, will remain open through most of the construction period. The Pine Street entrance ramp to I-70 eastbound will remain open and the exit ramp from I-70 to the C-D road to Ohio Street or Michigan Street will remain open. Construction of local roadway underpasses will be phased so adjacent roadways are not closed at the same time. MOT details will be presented during the public hearing. Access to all properties will be maintained during construction. INDOT will coordinate with emergency services, local school corporation officials, and project stakeholders to ensure potential disruptions and impacts are minimized as much as possible.

Federal and state funds are proposed to be used for construction of this project. An Environmental Assessment document has been prepared for the project. The environmental documentation is available to view prior at the following locations:



1. North Split Website – [www.northsplit.com/ea](http://www.northsplit.com/ea)
2. HNTB Office – 111 Monument Circle, Suite 1200, Indianapolis, IN 46204
3. Central Library – 40 E. Saint Clair Street, Indianapolis, IN 46204
4. Spades Park Branch Library – 1801 Nowland Avenue, Indianapolis, IN 46201
5. Garfield Park Branch Library – 2502 Shelby Street, Indianapolis, IN 46203
6. Martindale-Brightwood Branch Library – 2434 N. Sherman Drive, Indianapolis, IN 46218

The project will require the temporary use of the Monon Trail, which is managed by the City of Indianapolis. The Monon Trail is a recreational facility that is open to the public. A detour of the Monon Trail will be provided during construction of the North Split Project. The designed action will not adversely impact the activities, features, and attributes that qualify the property for protection under Section 4(f) of the Department of Transportation Act of 1966 and in accordance with SAFETEA-LU Section 6009 (a). As such, it is the intent of INDOT, along with the Federal Highway Administration to issue a finding of *de minimis*. In accordance with SAFETEA-LU Section 6009 (a), the views of the public are being sought regarding the effect of the proposed project on the public recreational area. Please respond with any comments no later than August 17, 2020 to the contact information below.

Verbal statements will be accepted during a public comment session at the public hearing for the official public record immediately following the formal presentation. Verbal comments may be restricted to time limitations based on the number of speakers. All verbal statements recorded during the public hearing and all written and verbal comments submitted prior to, during and for a period of two (2) weeks following the hearing date, will be evaluated, considered and addressed in subsequent environmental documentation. Comments may be submitted in the prior to the public hearing and within the comment period in the following ways:

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3. North Split PO Box – PO Box 44141, Indianapolis, IN 46244
4. INDOT Toll Free Phone Number - 1-877-799-6570

**The official public comment period for the EA begins on July 17 and will end on August 17, 2020. INDOT respectfully requests comments be submitted by August 17, 2020.**

In addition to the public hearing, a virtual public information meeting will be conducted by the North Split Project Team on Thursday, July 30, 2020 at 5:00 p.m. Eastern Time. The presentation will be conducted via WebEx, an online meeting platform. The presentation will be identical to the in-person public hearing presentation. A link to access the online presentation and instructions can be found at [www.northsplit.com/ea-sessions](http://www.northsplit.com/ea-sessions). The virtual public information meeting will also be broadcast on Indianapolis Government Access Channel 16.

Persons with limited internet access may request project information be mailed. Please contact the project email address, [info@northsplit.com](mailto:info@northsplit.com) or Kia Gillette, of HNTB Indiana, 111 Monument Circle, Suite 1200, Indianapolis, IN 46204, at [kgillette@hntb.com](mailto:kgillette@hntb.com), or 317-917-5240.

With advance notice, INDOT will provide accommodations for persons with disabilities with regards to participation and access to project information as part of the hearings process including arranging auxiliary aids, interpretation services for the hearing impaired, services for the sight impaired, and other services as needed. In addition, INDOT will provide accommodations for persons of Limited English Proficiency (LEP) requiring auxiliary aids including language interpretation services and document conversion. Should accommodation be required please



contact Erin Pipkin, Compass Outreach Solutions, at 317-966-7301 or [erin@compassoutreachsolutions.com](mailto:erin@compassoutreachsolutions.com).

This notice is published in compliance with Code of Federal Regulations, Title 23, Section 771 (CFR 771.111(h)(1) states: "Each State must have procedures approved by the FHWA to carry out a public involvement/public hearing program." 23 CFR 450.212(a)(7) states: "Public involvement procedures shall provide for periodic review of the effectiveness of the public involvement process to ensure that the process provides full and open access to all and revision of the process as necessary." approved by the Federal Highway Administration, U.S. Department of Transportation on August 16, 2012.

**The Indianapolis Star**

130 South Meridian Street  
Indianapolis, IN 46225  
Marion County, Indiana

Federal Id: 06-1032273

**HNTB CORP**

Account #:INI-21233  
Order #:0004285009  
# of Affidavits: 2  
Total Amount of Claim:\$397.70  
**This is not an invoice**

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111 MONUMENT CIR STE 1200  
INDIANAPOLIS, IN 46204

**PUBLISHER'S AFFIDAVIT**

**STATE OF WISCONSIN, }  
County Of Brown } SS:**

Personally appeared before me, a notary public in and for said county and state, the undersigned

I, being duly sworn, say that I am a clerk for THE INDIANAPOLIS NEWSPAPERS a DAILY STAR newspaper of general circulation printed and published in the English language in the city of INDIANAPOLIS in the state of INDIANA and county of MARION, and that the printed matter attached hereto is a true copy, which was duly published in said paper for 2 times., the dates of publication being as follows:

The insertion being on the 07/17/2020  
The insertion being on the 07/24/2020

Newspaper has a website and this public notice was posted in the same day as it was published in the newspaper.

Pursuant to the provisions and penalties of Ch. 155, Acts 1953,

I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

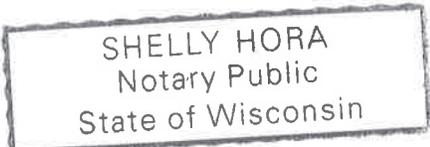
*Kathleen Allen*

Date: 8-12-20, 2020 Title: **Clerk**

Subscribed and sworn to before me this 24 day of July, 2020

*Shelly Hora*  
\_\_\_\_\_  
Notary Public

Notary Expires: 8-25-23



## LEGAL NOTICE OF PUBLIC HEARING

## I-65/I-70 North Split Interchange Reconstruction in Marion County

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In addition to the public hearing, a virtual public information meeting will be conducted by the North Split Project Team on Thursday, July 30, 2020 at 5:00 p.m. Eastern Time. The presentation will be conducted via WebEx, an online meeting platform. The presentation will be identical to the in-person public hearing presentation. A link to access the online presentation and instructions can be found at [www.northsplit.com/ea-sessions](http://www.northsplit.com/ea-sessions). The virtual public information meeting will also be broadcast on Indianapolis Government Access Channel 16.

Persons with limited internet access may request project information be mailed. Please contact the project email address, [info@northsplit.com](mailto:info@northsplit.com) or Kia Gillette, of HNTB Indiana, 111 Monument Circle, Suite 1200, Indianapolis, IN 46204, at [kgillette@hntb.com](mailto:kgillette@hntb.com), or 317-917-5240.

With advance notice, INDOT will provide accommodations for persons with disabilities with regards to participation and access to project information as part of the hearings process including arranging auxiliary aids, interpretation services for the hearing impaired, services for the sight impaired, and other services as needed. In addition, INDOT will provide accommodations for persons of Limited English Proficiency (LEP) requiring auxiliary aids including language interpretation services and document conversion. Should accommodation be required please contact Erin Pipkin, Compass Outreach Solutions, at 317-966-7301 or [erin@compassoutreachsolutions.com](mailto:erin@compassoutreachsolutions.com).

This notice is published in compliance with Code of Federal Regulations, Title 23, Section 771 (CFR 771.111(h)(1) states: "Each State must have procedures approved by the FHWA to carry out a public involvement/public hearing program." 23 CFR 450.212(a)(7) states: "Public involvement procedures shall provide for periodic review of the effectiveness of the public involvement process to ensure that the process provides full and open access to all and revision of the process as necessary." approved by the Federal Highway Administration, U.S. Department of Transportation on August 16, 2012.

S - 7/17, 7/24/2020 - 0004285009

hspaxlp

North Split Legal Notice of Public Hearing Mailing List

Name	Address 1	Address 2	City	State	Zip
Video Indiana INC	1000 N. Meridian St.		Indianapolis	IN	46204-1015
Current Resident	1001 N. Delaware St.		Indianapolis	IN	46202
Current Resident	1002 N. Illinois St.		Indianapolis	IN	46204
Current Resident	1004 Bordeaux Dr.		Leander	TX	78641
Current Resident	1010 Central Ave.	Unit 312	Indianapolis	IN	46202
4WS LLC	1011 E. Saint Clair St.		Indianapolis	IN	46202-3500
Current Resident	1011 N. Illinois St.		Indianapolis	IN	46204
Current Resident	1014 North Alabama Street		Indianapolis	IN	46202
Current Resident	10161 Arrowhead Court		Indianapolis	IN	46234
Current Resident	10172 Eagle Oaks Lane		Zionsville	IN	46077
Current Resident	1018 E. Ohio St.		Indianapolis	IN	46202
Current Resident	1025 E. Ohio St.		Indianapolis	IN	46202
Angies List INC	1030 E. Washington St.		Indianapolis	IN	46202-0000
Apollo-Aurora Associates, LLC	1030 N. College Ave.		Indianapolis	IN	46202-2726
UBE Associates	1030 N. College Ave.		Indianapolis	IN	46202-2726
Current Resident	1031 N. Pennsylvania St		Indianapolis	IN	46204
John Richardson	1031 N. Pennsylvania St.		Indianapolis	IN	46204-1022
Current Resident	1032 Broadway		Indianapolis	IN	46202
Current Resident	1032 N. New Jersey Street		Indianapolis	IN	46202
Current Resident	10325 Shakamak Way		Indianapolis	IN	46239
Current Resident	1040 N. Delaware St.		Indianapolis	IN	46204
Current Resident	1040 N. Delaware Street	Apt. 506	Indianapolis	IN	46202
Current Resident	1049 Hosbrook Street		Indianapolis	IN	46203
Current Resident	1051 Hosbrook St.		Indianapolis	IN	46203
Current Resident	1059 Elm St.		Indianapolis	IN	46023
Current Resident	108 E. 13th St.	#512	Indianapolis	IN	46202
Current Resident	108 E. 13th St.	Apt. 609	Indianapolis	IN	46202
Current Resident	1099 N. Meridian St.		Indianapolis	IN	46204
1101 N. Central LLC	1101 Central Ave.		Indianapolis	IN	46202-2629
Current Resident	1101 N. College Ave.		Indianapolis	IN	46202
11 & Delaware Partners	1101 N. Delaware St.		Indianapolis	IN	46202-2527
Current Resident	1101 N. Graham Ave.		Indianapolis	IN	46219
Current Resident	1102 N. College Ave.		Indianapolis	IN	46202
Current Resident	1102 N. New Jersey St.		Indianapolis	IN	46202
Kyle Robinson	1103 Island Woods Dr.		Indianapolis	IN	46220-1129
Current Resident	1106 N. Linwood Ave.		Indianapolis	IN	46201

North Split Legal Notice of Public Hearing Mailing List

Current Resident	1108 N. Alabama St.		Indianapolis	IN	46202
Current Resident	1108 N. Broadway St.		Indianapolis	IN	46202
Holler Park LLC	1109 E. 9th St.		Indianapolis	IN	46202-3526
Current Resident	1112 N. College Ave.		Indianapolis	IN	46202
Current Resident	1112 North College Ave.	Apartment 207	Indianapolis	IN	46202
Current Resident	1112 Polk Street		Indianapolis	IN	46202
Current Resident	1113 E. 10th Street		Indianapolis	IN	46202
Current Resident	1113 E. 15th St.		Indianapolis	IN	46202
Current Resident	1115 North Tacoma Avenue		Indianapolis	IN	46201
Current Resident	1119 Woodlawn Ave.		Indianapolis	IN	46203
Current Resident	1120 N. Delaware St.		Indianapolis	IN	46202
Ehren Weiss	11201 E. Lakeshore Dr.		Carmel	IN	46033-4405
Current Resident	1135 E. 15th St.		Indianapolis	IN	46202
Current Resident	1141 E. 10th Street		Indianapolis	IN	46202
Far Mar Real Estate LLC	11490 Niagara Dr.		Fishers	IN	46037-4073
Current Resident	11498 Knightsbridge Lane		Fishers	IN	46037
Robert Lebow Trustee	1155 Questover Cir.		Indianapolis	IN	46228-1436
Mah Northside Flats LP	11590 N. Meridian St.	Ste. 120	Carmel	IN	46032-6955
Current Resident	117 Pope Street	Apt. M	Indianapolis	IN	46202
CAMKYR IN LLC	11715 Fox Rd.	Ste. 400-107	Indianapolis	IN	46236-8421
Current Resident	11720 Gatwick View		Fishers	IN	46037
Elizabeth Zappia	118 N. Gibson Ave.		Indianapolis	IN	46219-5408
Indpls, City of BD of	120 E. Walnut St.		Indianapolis	IN	46204-0000
Roosevelt Landsite LLC	12000 Exit 5 Pkwy.		Fishers	IN	46037-7940
Historic Landmarks	1201 Central Ave.		Indianapolis	IN	46202-2656
Current Resident	1202 N. Illinois St.		Indianapolis	IN	46202
Eric Hoch	1202 N. Pennsylvania St.		Indianapolis	IN	46202-2411
Current Resident	1202 Sturm Ave.		Indianapolis	IN	46202
Current Resident	1205 Fletcher Ave.		Indianapolis	IN	46203
Current Resident	1205 N. Park Ave.		Indianapolis	IN	46202
Current Resident	1209 E. 10th St.		Indianapolis	IN	46202
David Hohman	121 E. Ohio St.		Indianapolis	IN	46204-2128
Current Resident	121 N. Pine St.		Indianapolis	IN	46202
Current Resident	1210 N. Illinois St.		Indianapolis	IN	46202
Current Resident	1210 N. Pennsylvania St.		Indianapolis	IN	46202
Current Resident	1212 Broadway St.		Indianapolis	IN	46202
Current Resident	1212 N. New Jersey St.		Indianapolis	IN	46202
Current Resident	1213 Lesley Ave.		Indianapolis	IN	46219

North Split Legal Notice of Public Hearing Mailing List

Current Resident	1214 N. Meridian St.		Indianapolis	IN	46204
Current Resident	1214 Pleasant St.		Indianapolis	IN	46203
Current Resident	1215 N. Pennsylvania St.		Indianapolis	IN	46202
Current Resident	1215 Sterling St.		Indianapolis	IN	46201
Current Resident	1219 E. 15th St.		Indianapolis	IN	46202
Current Resident	122 E. 22nd St.	Apt. B	Indianapolis	IN	46202
Current Resident	1220 N. New Jersey Street		Indianapolis	IN	46202
Current Resident	1221 Broadway St.		Indianapolis	IN	46202
Current Resident	1221 E. 15th St.		Indianapolis	IN	46201
Current Resident	1222 Central Ave.		Indianapolis	IN	46202
Cavell, Clayton	1226 Broadway St.		Indianapolis	IN	46202-2737
Current Resident	1227 Herbert St.		Indianapolis	IN	46202
Mary Susan Bates	1229 Broadway St.		Indianapolis	IN	46202-2736
Ohio Pine Properties LLC	123 N. Pine St.		Indianapolis	IN	46202-3844
Benjamin Harrison Presidential Site INC	1230 N. Delaware St.		Indianapolis	IN	46202-2598
Current Resident	1232 N. College Ave.		Indianapolis	IN	46202
Hilary Barnes	1233 Broadway St.		Indianapolis	IN	46202-2736
Current Resident	1236 N. New Jersey St.		Indianapolis	IN	456202
Current Resident	1239 N. Park Ave.		Indianapolis	IN	46202
Current Resident	1240 N. Oakland Ave		Indianapolis	IN	46201
Current Resident	12448 Geist Cove Drive		Indianapolis	IN	46236
Current Resident	12941 Galloway Circle		Fishers	IN	46138
Current Resident	13 S. Davidson St.		Indianapolis	IN	46202
Current Resident	1301 E. New York St.		Indianapolis	IN	46202
Current Resident	1301 N. College Ave.		Indianapolis	IN	46202
Current Resident	1302 Columbia Ave.		Indianapolis	IN	46202
Current Resident	1302 Wright St.		Indianapolis	IN	46203
Current Resident	1308 Central Ave.	Apt. 208	Indianapolis	IN	46202
William Crofts	1308 N. Audobon Rd.		Indianapolis	IN	46219-3120
Current Resident	1308 Yandes St.		Indianapolis	IN	46202
Current Resident	1311 E. Michigan St.		Indianapolis	IN	46202
Current Resident	1315 N. College Ave.		Indianapolis	IN	46202
Current Resident	1317 S. Reisner St.		Indianapolis	IN	46221
Current Resident	1321 N. College Ave.		Indianapolis	IN	46202
Current Resident	1321 N. Meridian St.	Apt. 414	Indianapolis	IN	46202
Current Resident	1322 N. Alabama St.	Unit C	Indianapolis	IN	46202
Current Resident	1322 N. Alabama St.	Unit D	Indianapolis	IN	46202
Peter Pappas	1322 N. College Ave.		Indianapolis	IN	46202-2719

North Split Legal Notice of Public Hearing Mailing List

Current Resident	1323 N. Park Avenue		Indianapolis	IN	46202
Hardees Restaurants LLC	1325 N. Anaheim Blvd.		Anaheim	CA	92801-1202
Ronald White	1325 N. College Ave.		Indianapolis	IN	46202-0000
Current Resident	1326 Hoyt Avenue		Indianapolis	IN	46203
Juanita Merriweather	1327 N. College Ave.		Indianapolis	IN	46202-2718
Current Resident	135 N. College Ave.		Indianapolis	IN	46202
Current Resident	1350 N. Meridian St.	Apt. 308	Indianapolis	IN	46202
Current Resident	1400 N. Park Ave.		Indianapolis	IN	46202
Current Resident	1401 East Vermont St.		Indianapolis	IN	46201
1402 Commerce Ave. LLC	1402 Commerce Ave.		Indianapolis	IN	46201-0000
Current Resident	1406 N. Arsenal Ave.		Indianapolis	IN	46201
Current Resident	1409 E. 11th St.		Indianapolis	IN	46201
Michael Warfield	1410 Clay St.		LaPorte	IN	46350-3618
Current Resident	1410 N. Arsenal Ave.		Indianapolis	IN	46201
Current Resident	1411 E. Market St.	Apt. 108	Indianapolis	IN	46201
Current Resident	1417 Olive Street		Indianapolis	IN	46203
Current Resident	1418 E. Ohio St.		Indianapolis	IN	46201
Current Resident	142 S. Elder Ave.		Indianapolis	IN	46222
Current Resident	1420 Dr. Andrew J. Brown Ave.		Indianapolis	IN	46202
Current Resident	1421 N. Alabama St.		Indianapolis	IN	46202
Current Resident	1421 N. New Jersey St.		Indianapolis	IN	46219
Current Resident	1425 E. Vermont St.		Indianapolis	IN	46201
Current Resident	1426 East Vermont St.		Indianapolis	IN	46201
Current Resident	1429 Sturm Ave.		Indianapolis	IN	46201
Current Resident	1430 Madison Ave.	Apt. 308	Indianapolis	IN	46225
Current Resident	1431 Dr. Andrew J. Brown Ave.		Indianapolis	IN	46202
Current Resident	1433 S. State Ave.		Indianapolis	IN	46203
Current Resident	1435 Dr. Andrew J. Brown Ave.		Indianapolis	IN	46202
Current Resident	1437 N. New Jersey Street		Indianapolis	IN	46202
Greater Bethlehem Church	1441 Yandes St.		Indianapolis	IN	46202-1951
Current Resident	1443 N. New Jersey Street		Indianapolis	IN	46202
Current Resident	1444 Columbia Ave.		Indianapolis	IN	46202
Current Resident	1446 Roosevelt Ave.		Indianapolis	IN	46201
Current Resident	1450 Central Ave.		Indianapolis	IN	46202
Current Resident	1451 Central Avenue	#113	Indianapolis	IN	46202
Current Resident	1451 Hoyt Ave.		Indianapolis	IN	46203
Current Resident	1451 N. Euclid Ave.		Indianapolis	IN	46201
Current Resident	1458 N. New Jersey St.		Indianapolis	IN	46202

North Split Legal Notice of Public Hearing Mailing List

Current Resident	1461 E. 16th St.		Indianapolis	IN	46201
Current Resident	1463 E. 16th St.		Indianapolis	IN	46201
Current Resident	1464 Central Ave.		Indianapolis	IN	46202
Current Resident	1469 North Alabama St.		Indianapolis	IN	46202
Current Resident	1472 Roosevelt Ave.		Indianapolis	IN	46201
Current Resident	1503 Columbia Ave.		Indianapolis	IN	46202
Current Resident	1505 Burdsal Parkway		Indianapolis	IN	46208
Current Resident	1505 S. East Street		Indianapolis	IN	46225
Current Resident	1507 Broadway Street		Indianapolis	IN	46202
Current Resident	1508 Dr. Andrew J. Brown Ave.		Indianapolis	IN	46202
Current Resident	151 E. Fall Creek Parkway S. Dr.		Indianapolis	IN	46205
Current Resident	1511 Sheldon St.		Indianapolis	IN	46201
Current Resident	1516 North Oxford Street		Indianapolis	IN	46201
New Bethel Church	1519 Dr. Andrew J. Brown Ave.		Indianapolis	IN	46202-1906
Current Resident	1520 Bellefontaine St.		Indianapolis	IN	46202
Current Resident	1521 Carrollton Ave.		Indianapolis	IN	46202
Current Resident	1524 Roosevelt Ave.		Indianapolis	IN	46201
Current Resident	1529 N. Alabama Street	Unit J	Indianapolis	IN	46202
New Bethel Baptist Church	1535 Dr. Andrew J. Brown Ave.		Indianapolis	IN	46202-0000
Current Resident	1538 N. Arsenal Ave.		Indianapolis	IN	46201
Current Resident	1539 Pleasant St.		Indianapolis	IN	46203
Current Resident	1540 N. Park Ave.		Indianapolis	IN	46202
Current Resident	1542 Sheldon St.		Indianapolis	IN	46201
Current Resident	1543 N. Arsenal Ave.		Indianapolis	IN	46201
Current Resident	1549 Broadway St.		Indianapolis	IN	46202
Current Resident	1549 N. Park Ave.		Indianapolis	IN	46202
Current Resident	1552 Spann Ave.		Indianapolis	IN	46203
Current Resident	1562 Carrollton Ave.		Indianapolis	IN	46202
Current Resident	1563 N. Huber St.		Indianapolis	IN	46219
Current Resident	1600 E Vermont St		Indianapolis	IN	46201
Current Resident	1601 E Michigan Street		Indianapolis	IN	46201
Indianapolis Church	1602 E. 34th St.		Indianapolis	IN	46218-1917
Current Resident	1602 Ludlow Ave.		Indianapolis	IN	46201
Current Resident	1603 Pleasant St.		Indianapolis	IN	46203
Current Resident	1605 Roosevelt Ave.		Indianapolis	IN	46218
Johnnie Johnson	1608 N. New Jersey St.		Indianapolis	IN	46202-1613
Johnnie Wiley	1608 N. New Jersey St.		Indianapolis	IN	46202-1613
Current Resident	1609 Cornell Ave.		Indianapolis	IN	46202

North Split Legal Notice of Public Hearing Mailing List

Current Resident	1610 Roosevelt Ave.		Indianapolis	IN	46218
Current Resident	1612 Yandes Street		Indianapolis	IN	46202
Angela Hurns	1613 Ingram St.		Indianapolis	IN	46218-0000
Current Resident	1616 Yandes St.		Indianapolis	IN	46202
Candee Bateman	1617 Ingram St.		Indianapolis	IN	46218-4245
Paulino Rafael Garfias-Bolanos	1621 Ingram St.		Indianapolis	IN	46218-4245
Current Resident	1625 Ingram St.		Indianapolis	IN	46218
Current Resident	1626 N. New Jersey St.		Indianapolis	IN	46202
Ida Mae Sims	1629 Ingram St.		Indianapolis	IN	46218-4245
Mary Beech	1641 Ingram St.		Indianapolis	IN	46218-4245
Jared Byczko	1654 Carrollton Ave.		Indianapolis	IN	46202-1709
Current Resident	1657 S. Talbott St.		Indianapolis	IN	46225
Current Resident	1701 N. Delaware St.		Indianapolis	IN	46202
Current Resident	1702 E. 12th St.		Indianapolis	IN	46201
Floyd Proctor Sr.	1705 Ingram St.		Indianapolis	IN	46218-4245
Current Resident	1713 Ingram St.		Indianapolis	IN	46218
Current Resident	1714 Yandes St.		Indianapolis	IN	46202
Current Resident	1717 Ingram St.		Indianapolis	IN	46218
Current Resident	1718 Central Ave.		Indianapolis	IN	46202
Current Resident	1721 Ingram St.		Indianapolis	IN	46218
Current Resident	1723 Cross Drive		Indianapolis	IN	46201
Current Resident	1725 E. Tabor St.		Indianapolis	IN	46203
Floyd Proctor Jr.	1725 Ingram St.		Indianapolis	IN	46218-4245
Current Resident	1731 Ingram St.		Indianapolis	IN	46218
Current Resident	1733 S. Delaware St.		Indianapolis	IN	46225
Current Resident	1737 Alvord St.		Indianapolis	IN	46202
Hillside Church	1737 Ingram St.		Indianapolis	IN	46218-4245
Current Resident	1738 Ludlow Ave.		Indianapolis	IN	46201
Current Resident	1757 East Tabor Street		Indianapolis	IN	46203
Current Resident	1801 N. Alabama St.		Indianapolis	IN	46202
Current Resident	1805 Ingram St.		Indianapolis	IN	46218
Current Resident	1806 Central Ave.		Indianapolis	IN	46202
Current Resident	1806 Yandes Street		Indianapolis	IN	46202
Current Resident	1807 Commerce Ave.		Indianapolis	IN	46201
Current Resident	1808 Central Ave.		Indianapolis	IN	46202
David G. Abernathy	1809 Ingram St.		Indianapolis	IN	46218-4245
Current Resident	1815 N. Alabama Street		Indianapolis	IN	46202
Current Resident	1819 Roosevelt Ave.		Indianapolis	IN	46218

North Split Legal Notice of Public Hearing Mailing List

Current Resident	1822 S. Talbott Street		Indianapolis	IN	46225
Current Resident	1831 Ingram St.		Indianapolis	IN	46218
Current Resident	1833 Ingram St.		Indianapolis	IN	46218
Trena Kendricks	1833 Roosevelt Ave.		Indianapolis	IN	46218-4258
Current Resident	1837 Roosevelt Ave.		Indianapolis	IN	46218
Current Resident	1838 E. Legrande Ave.		Indianapolis	IN	46203
Meck Company Family LP	1841 Ludlow Ave.		Indianapolis	IN	46201-1035
Mitchel & Scott Machine	1841 Ludlow Ave.		Indianapolis	IN	46201-1035
Current Resident	1846 Central Ave.		Indianapolis	IN	46202
Current Resident	1846 Central Ave.		Indianapolis	IN	46202
Current Resident	1848 Ludlow Ave.		Indianapolis	IN	46218
Current Resident	1901 N. Pennsylvania St.		Indianapolis	IN	46202
Current Resident	1905 N. Talbott St.		Indianapolis	IN	46202
William Hawkins	1906 N. New Jersey St.		Indianapolis	IN	46202-1619
Current Resident	1907 Broadway	Apt. E	Indianapolis	IN	46202
Current Resident	1909 N. Pennsylvania St.		Indianapolis	IN	46202
Current Resident	1910 Ruckle Street		Indianapolis	IN	46202
Current Resident	1911 Central Avenue		Indianapolis	IN	46202
Current Resident	1912 Valley Ave.		Indianapolis	IN	46218
Current Resident	1917 Central Ave.		Indianapolis	IN	46204
Current Resident	1917 Ruckle St.		Indianapolis	IN	46204
Current Resident	1925 Central Ave.		Indianapolis	IN	46202
Current Resident	1925 N. Talbott St.		Indianapolis	IN	46202
Current Resident	1928 N. Park Ave.		Indianapolis	IN	46202
Current Resident	1936 N. Delaware		Indianapolis	IN	46202
Current Resident	1945 Valley Ave.		Indianapolis	IN	46218
Current Resident	1956 Central Ave.		Indianapolis	IN	46202
Consolidated Rail Corp	2001 Market St.		Philadelphia	PA	19101-0000
Current Resident	2001 N. Alabama Street		Indianapolis	IN	46202
Current Resident	2001 N. Delaware St.		Indianapolis	IN	46202
Current Resident	2001 Nowland Ave.		Indianapolis	IN	46201
B & D Training Services INC	2002 E. 62nd St.		Indianapolis	IN	46220-0000
Nathan Sevier	2007 Roosevelt Ave.		Indianapolis	IN	46218-0000
Current Resident	2010 Ludlow Ave.		Indianapolis	IN	46218
Current Resident	2012 N. Alabama St.		Indianapolis	IN	46202
Current Resident	2014 N. New Jersey		Indianapolis	IN	46202
Current Resident	2015 Ruckle St.		Indianapolis	IN	46202
Current Resident	2017 Langley Ave.		Indianapolis	IN	46218

North Split Legal Notice of Public Hearing Mailing List

Mark Easley	202 N. College Ave.		Indianapolis	IN	46202-3702
Current Resident	2020 N. Delaware St.	Apt. 4	Indianapolis	IN	46202
Current Resident	2020 N. Park Ave.		Indianapolis	IN	46202
Current Resident	2020 Valley Ave.		Indianapolis	IN	46218
Current Resident	2023 Langley Ave.		Indianapolis	IN	46218
Current Resident	2030 N. Talbott Street		Indianapolis	IN	46202
Current Resident	2042 North New Jersey Street		Indianapolis	IN	46202
Current Resident	2045 N. New Jersey St.		Indianapolis	IN	46202
Current Resident	2046 North New Jersey Street		Indianapolis	IN	46202
Mark Easley	205 N. College Ave.		Indianapolis	IN	46202-3701
Current Resident	206 Fulton St.		Indianapolis	IN	46202
Current Resident	2102 N. New Jersey St.		Indianapolis	IN	46202
Current Resident	2102 Valley Ave.		Indianapolis	IN	46218
B2C3 LLC	2108 Caledonian Ct.		Greenwood	IN	46143-8251
Current Resident	2111 S. Delaware St.		Indianapolis	IN	46225
Current Resident	2126 N. Pennsylvania Street		Indianapolis	IN	46202
Current Resident	2133 N. Park Ave.		Indianapolis	IN	46202
Current Resident	2144 N. Alabama St.		Indianapolis	IN	46202
Current Resident	2156 N. Pennsylvania St.		Indianapolis	IN	46202
Current Resident	2158 N. Alabama St.		Indianapolis	IN	46202
Current Resident	2169 N. Pennsylvania St.		Indianapolis	IN	46202
Current Resident	2172 N. Pennsylvania		Indianapolis	IN	46202
Current Resident	218 Sanders St.		Indianapolis	IN	46225
Adam Peaper	220 E. 11th St.		Indianapolis	IN	46202-2570
Current Resident	220 N. Davison St.		Indianapolis	IN	46202
Current Resident	2203 Broadway St.	Apt. 11	Indianapolis	IN	46205
Current Resident	221 E. Michigan St.	Apt. 601	Indianapolis	IN	46204
Current Resident	2217 N. Alabama St.		Indianapolis	IN	46205
Current Resident	222 East Street	Unit 107	Indianapolis	IN	46202
Current Resident	222 S. Downey Ave.	Apt. 110	Indianapolis	IN	46219
Current Resident	223 Dickson Street		Indianapolis	IN	46202
Current Resident	2238 N. Delaware St		Indianapolis	IN	46205
Current Resident	225 E. 11th Street		Indianapolis	IN	46202
Current Resident	225 N. Arsenal Ave.		Indianapolis	IN	46201
Current Resident	225 N. Highland Ave.		Indianapolis	IN	46202
Current Resident	2250 N. Pennsylvania St.	Unit 6	Indianapolis	IN	46205
Current Resident	2258 N. Meridian St.	Apt. 307	Indianapolis	IN	46208
Current Resident	226 Buckingham Drive		Indianapolis	IN	46208

North Split Legal Notice of Public Hearing Mailing List

Current Resident	226 E. 11th St.		Indianapolis	IN	46202
Current Resident	226 E. 12th Street	Apt. 102	Indianapolis	IN	46202
Current Resident	226 N. Cleveland St.	Apt. B	Indianapolis	IN	46204
Peggy Angleton	226 N. Davidson St.		Indianapolis	IN	46202-3703
Current Resident	228 N. Davidson St.		Indianapolis	IN	46202
Yue Liu	230 Pennridge Dr.		Indianapolis	IN	46240-3083
Current Resident	2308 N. College Ave.		Indianapolis	IN	46205
Current Resident	231 East 9th	#231	Indianapolis	IN	46204
Current Resident	2321 Broadway Street		Indianapolis	IN	46205
Current Resident	2327 Union St.		Indianapolis	IN	46225
Current Resident	234 N. Davidson St.		Indianapolis	IN	46202
Current Resident	2348 N. Pennsylvania		Indianapolis	IN	46205
Current Resident	2350 Guilford Ave.		Indianapolis	IN	46205
Tiffini Rena Allen	240 N. Davidson St.		Indianapolis	IN	46202-3703
Current Resident	2402 N. Park Ave.		Indianapolis	In	46205
Current Resident	2404 Central Ave.		Indianapolis	IN	46205
Current Resident	2407 Broadway St.		Indianapolis	IN	46205
Current Resident	2413 N. Delaware St.		Indianapolis	IN	46205
Current Resident	2415 N. Pennsylvania St		Indianapolis	IN	46205
Current Resident	2425 Asbury St.		Indianapolis	IN	46203
Current Resident	2428 North Park avenue		Indianapolis	IN	46205
Current Resident	2434 N. Delaware St.		Indianapolis	IN	46205
Current Resident	245 N. Highland Ave.		Indianapolis	IN	46202
Current Resident	2458 Verbena Drive		Plainfield	IN	46168
Janet Susan Loudermilk	2500 W. 42nd St.		Indianapolis	IN	46228-3214
Current Resident	2506 N. Alabama St.		Indianapolis	IN	46205
Current Resident	2526 N. Alabama St.		Indianapolis	IN	46205
Current Resident	2527 N. College Ave.		Indianapolis	IN	46205
Current Resident	2532 E. 17th St.		Indianapolis	IN	46218
Current Resident	2544 E. 17th Street		Indianapolis	IN	46218
Current Resident	2548 N. Alabama		Indianapolis	IN	46205
Big Management	25712 Cannistraci Ln.		Hayward	CA	94541-5746
Current Resident	2606 N. Delaware Street		Indianapolis	IN	46205
Current Resident	2620 Baltimore Ave.		Indianapolis	IN	46218
Current Resident	2625 N. Meridian St.	Apt. 1015	Indianapolis	IN	46208
Current Resident	2631 N Alabama St.		Indianapolis	IN	46205
Pleasant View Partnership LP	2705 S. 975 E.		Zionsville	IN	46077-9426
Nine Eleven Mass LLC	2715 Benmore Ct.		Zionsville	IN	46077-2207

North Split Legal Notice of Public Hearing Mailing List

Current Resident	2729 N. College Ave.		Indianapolis	IN	46205
Current Resident	2735 E. 67th St.		Indianapolis	IN	46220
FE Trans LLC	277 E. 12TH St.		Indianapolis	IN	46202-2508
G & M Investment Property LLC	2774 N. County Rd. 950 E.		Seymour	IN	47274-9371
Current Resident	28 E. 16th Street	Apartment 601	Indianapolis	IN	46202
Indy East Asset Dev Corp	2807 E. 10th St.		Indianapolis	IN	46201-2409
T4 Development Company LLC	2839 Lafayette Rd.		Indianapolis	IN	46222-2193
Current Resident	2839 N. Talbott Street		Indianapolis	IN	46205
Martindale Brightwood CDC	2855 N. Keystone Ave.	Ste. 130	Indianapolis	IN	46218-2790
Current Resident	2906 N. Park Avenue		Indianapolis	IN	46205
Current Resident	2924 N. Kenwood Ave.		Indianapolis	IN	46208
Landmark Acquisitions LLC	30 Vreeland Dr.	Ste. 2-3	Skillman	NJ	08558-2637
Current Resident	3025 Skylar Lane		Indianapolis	IN	46208
Current Resident	303 E. St. Clair St.		Indianapolis	IN	46202
Current Resident	303 North Alabama Street	Suite 240	Indianapolis	IN	46204
Current Resident	3110 N. Keystone		Indianapolis	IN	46218
Current Resident	3115 Wade St.		Indianapolis	IN	46203
Current Resident	3139 River Shore Place		Indianapolis	IN	46208
Current Resident	3151 Washington Blvd.		Indianapolis	IN	46205
Current Resident	316 E. 10th Street		Indianapolis	IN	46202
Current Resident	321 E. 11th Street		Indianapolis	IN	46202
Current Resident	322 Canal Walk	Apt. 179	Indianapolis	IN	46202
Current Resident	3223 Washington Blvd.		Indianapolis	IN	46205
1102 College LLC	3225 Mcleod Dr.	Ste. 100	Las Vegas	NV	89121-2257
Current Resident	324 E. 12th St.		Indianapolis	IN	46202
Current Resident	324 E. 7th St.		Indianapolis	IN	46202
Current Resident	3252 Ralston Avenue		Indianapolis	IN	46218
Current Resident	326 E. Saint Clair St.		Indianapolis	IN	46202
Current Resident	3282 Ralston		Indianapolis	IN	46218
Current Resident	331 E. 10th St		Indianapolis	IN	46202
Current Resident	333 N. Highland Ave.		Indianapolis	IN	46202
Current Resident	335 North East St.		Indianapolis	IN	46202
Current Resident	336 N. Reisner St.		Indianapolis	IN	46222
Current Resident	3402 N. Meridian St.	#105	Indianapolis	IN	46208
Extra Space Properties 131 LLC	34405 W. 12 Mile Rd.	Ste. 215	Farmington Hills	MI	48331-5626
Current Resident	3462 N. Kenwood Avenue		Indianapolis	IN	46208
Current Resident	349 E. Morris St.		Indianapolis	IN	46225
Current Resident	350 N. Meridian Street	#704	Indianapolis	IN	46204

North Split Legal Notice of Public Hearing Mailing List

Current Resident	3515 Pennsylvania Street	#106	Indianapolis	IN	46205
Robin Killebrew	3588 Caroline Ave.		Indianapolis	IN	46218-1026
Current Resident	359 N. West St.	Apt. 283	Indianapolis	IN	46202
ARC Acquisition & Redevelopment	3602 Central Ave.		Indianapolis	IN	46205-3552
Qiana Hall	3627 N. Rural St.		Indianapolis	IN	46218-1265
Current Resident	3635 Totem Lane		Indianapolis	IN	46208
Current Resident	3650 Spring Hollow Rd.		Indianapolis	IN	46208
Current Resident	3659 Wingate Terrace	Apartment # A	Indianapolis	IN	46235
Current Resident	370 E. St. Clair Street		Indianapolis	IN	46202
Current Resident	3705 N. Capitol Ave.		Indianapolis	IN	46208
Current Resident	3709 E. Market St.		Indianapolis	IN	46201
Current Resident	3831 Arbor Green Way	Apt. 915	Indianapolis	IN	46220
Current Resident	3950 Winding Way		Indianapolis	IN	46220
Orlando Jordan	3967 Broadway St.		Indianapolis	IN	46205-2728
Current Resident	401 N Arsenal Ave.		Indianapolis	IN	46201
Current Resident	401 N. Illinois Street 6A		Indianapolis	IN	46204
Current Resident	401 N. Illinois	#3e	Indianapolis	IN	46204
Current Resident	401 N. Senate	Unit 472	Indianapolis	IN	46204
Current Resident	402 N. Hamilton Ave.		Indianapolis	IN	46201
Current Resident	402 N. Meridian St.	#207	Indianapolis	IN	46222
Current Resident	405 N. Adams Street		Knightstown	IN	46148
Current Resident	406 E. Michigan St.	Apt. 502	Indianapolis	IN	46204
Current Resident	406 East Michigan Street	Apt. 311	Indianapolis	IN	46204
School 9 LLC	407 N. Fulton St.		Indianapolis	IN	46202-0000
Current Resident	4141 Office Plaza Boulevard		Indianapolis	IN	46254
Current Resident	420 Canal View Way	Apt. H	Indianapolis	IN	46202
Current Resident	4216 Cornell Crossing		Kennesaw	GA	30144
Jonithan Evans	422 E. 11th St.		Indianapolis	IN	46202-2567
Current Resident	423 Canal Court North Dr.	Apt. D	Indianapolis	IN	46202
Current Resident	423 N. Hamilton Avenue		Indianapolis	IN	46201
Steven Ryan	424 E. 11th St.		Indianapolis	IN	46202-2567
Aaron Haith	425 E. Walnut St.		Indianapolis	IN	46202-3367
Christine McCarley	426 E. 11th St.		Indianapolis	IN	46202-2567
Amanda Stirratt	428 E. 11th St.		Indianapolis	IN	46202-2567
Current Resident	430 N. Park Ave.	Apt. 401	Indianapolis	IN	46202
Current Resident	430 N. Park Ave.	#201	Indianapolis	IN	46202
Joan Robinson	4310 Guion Rd.		Indianapolis	IN	46254-3111
Current Resident	432 E. 11th St.		Indianapolis	IN	46202

North Split Legal Notice of Public Hearing Mailing List

Current Resident	434 N. 17th Ave.		Beech Grove	IN	46107
Current Resident	4341 N. College Ave.		Indianapolis	IN	46205
Current Resident	435 Virginia Ave.	Unit 608	Indianapolis	IN	46203
Current Resident	435 Virginia Avenue	Apt. 105	Indianapolis	IN	46203
Current Resident	435 Virginia Avenue	Unit 804	Indianapolis	IN	46203
Current Resident	441 Fulton St.		Indianapolis	IN	46202
North Side Linoleum Mart	445 N. Pennsylvania St.	Ste. 200	Indianapolis	IN	46204-0000
Fulton Street Townhomes	447 Fulton St.		Indianapolis	IN	46202-3614
Dean & Timothy Coleman	448 N. Davidson St.		Indianapolis	IN	46202-0000
Timothy & Dean Rievley	448 N. Davidson St.		Indianapolis	IN	46202-3609
Current Resident	450 E. Market St.	Apt. 503	Indianapolis	IN	46204
Current Resident	450 E. Ohio Street	Apt. 114	Indianapolis	IN	46204
Current Resident	4775 E. 55th St.		Indianapolis	IN	46220
Current Resident	4852 Thicket Grove Ln.		Indianapolis	IN	46237
Current Resident	493 E. Arch St.		Indianapolis	IN	46202
Current Resident	501 Fulton St.		Indianapolis	IN	46202
Current Resident	502 E. 17th St.	Apt. 104	Indianapolis	IN	46202
Current Resident	502 East Vermont street		Indianapolis	IN	46202
ALSCO INC	505 E. South Temple		Salt Lake City	UT	84102-1004
Current Resident	505 Red Fox Run		Arcadia	IN	46030
Current Resident	5113 Guilford Avenue		Indianapolis	IN	46205
Current Resident	5122 Winthrop Ave.		Indianapolis	IN	46205
Current Resident	513 E. 10th St.		Indianapolis	IN	46202
Current Resident	514 E. Walnut St.		Indianapolis	IN	46202
Michael Bowman	5146 Central Ave.		Indianapolis	IN	46205-1058
Current Resident	5159 N. Capitol Ave.		Indianapolis	IN	46208
Current Resident	516 East 15th St.		Indianapolis	IN	46202
Current Resident	518 E. 10th St.		Indianapolis	IN	46202
Current Resident	519 E. McCarty Street		Indianapolis	IN	46203
Current Resident	520 E. 11th St.		Indianapolis	IN	46202
Current Resident	5209 West 16th Street		Speedway	IN	46224
Current Resident	521 E. New York Street		Indianapolis	IN	46202
Current Resident	524 E. 11th St.		Indianapolis	IN	46202
Current Resident	524 N. Riley Ave.		Indianapolis	IN	46201
Bottleworks District LLC	525 3rd St.	Ste. 300	Beloit	WI	53511-6225
Keith Rheinhardt	525 W. 70th St.		Indianapolis	IN	46260-4100
Current Resident	530 E Ohio Street	#323	Indianapolis	IN	46204
Current Resident	530 E. Ohio St.	Unit 222	Indianapolis	IN	46202

North Split Legal Notice of Public Hearing Mailing List

Current Resident	530 N. Temple Ave.		Indianapolis	IN	46201
Current Resident	531 East 15th Street		Indianapolis	IN	46202
Current Resident	531 N. Pine St.		Indianapolis	IN	46202
Current Resident	5347 N. College Ave.	Apt. 310	Indianapolis	IN	46220
Kerry Ferguson	535 E. 11th St.		Indianapolis	IN	46202-2627
Current Resident	536 E. New York St.		Indianapolis	IN	46202
Current Resident	541 Allard Place		Indianapolis	IN	46202
Current Resident	541 Lockerbie Cir. N		Indianapolis	IN	46202
R T Buck LLC	542 E. 11th St.		Indianapolis	IN	46202-2628
Thomas Battista	5430 N. New Jersey St.		Indianapolis	IN	46220-3020
Current Resident	545 Fletcher Ave.		Indianapolis	IN	46203
E Fund VIII LP	55 N. State Ave.	Ste. 301	Indianapolis	IN	46201-0000
Current Resident	55 S. Harding	Apt. 309	Indianapolis	IN	46222
Current Resident	55 S. Harding St.	Apt. 306	Indianapolis	IN	46222
Current Resident	5616 Haverford Ave.		Indianapolis	IN	46220
Current Resident	5648 Guilford Ave.		Indianapolis	IN	46220
Current Resident	5660 N Keystone Ave.		Indianapolis	IN	46220
Current Resident	57 E. 38th Street	Apt. 205	Indianapolis	IN	46205
Leroy & Winifred Cheeks	5705 Andover Rd.		Indianapolis	IN	46220-5316
Current Resident	5715 Quail Rd.		Indianapolis	IN	46278
Current Resident	5715 Wheeler Rd.	Apt. 3D	Indianapolis	IN	46216
Current Resident	5733 Guilford Ave.		Indianapolis	IN	46220
Current Resident	58 N. Ridgeview Dr.		Indianapolis	IN	46219
East End Property Management LLC	5833 N. Illinois St.		Indianapolis	IN	46208-1522
Current Resident	5855 Brockton Dr.	Apt. 2	Indianapolis	IN	46220
Current Resident	5924 Osage Drive		Carmel	IN	46033
Mahrtd Properties INC	600 Kentucky Ave.	Ste. 200	Indianapolis	IN	46225-0000
Current Resident	602 Sanders St.		Indianapolis	IN	46203
Roosevelt IN LLC	6030 Hollywood Blvd.	Ste. 200	Hollywood	FL	33024-7923
Roosevelt IN LLC	6030 Hollywood Blvd.	#240	Hollywood	FL	33024-0000
Current Resident	605 Ellsworth St.		Indianapolis	IN	46202
Current Resident	606 E. Arch St.		Indianapolis	IN	46202
Current Resident	606 E. Broadway Pl.		Indianapolis	IN	46202
Current Resident	608 Woodruff Place West Dr.	Apt. 3	Indianapolis	IN	46201
Current Resident	609 Stevens St.		Indianapolis	IN	46203
Current Resident	611 North Park Avenue	Apt. 201	Indianapolis	IN	46204
Current Resident	611 North Park Avenue	#512	Indianapolis	IN	46204
Broadway & 11TH LLC	612 E. 11th St.	Ste. 730	Indianapolis	IN	46202-0000

North Split Legal Notice of Public Hearing Mailing List

Current Resident	614 E. Broadway Pl.		Indianapolis	IN	46202
Current Resident	615 E. 33rd St.		Indianapolis	IN	46205
Gayle Young Sr.	6152 Carrington Dr.		Indianapolis	IN	46236-0000
Current Resident	6161 N. 200 W.		Columbus	IN	47201
Current Resident	617 North Bancroft Street		Indianapolis	IN	46201
Current Resident	618 Lockerbie St.		Indianapolis	IN	46202
Current Resident	619 Lockerbie St.		Indianapolis	IN	46202
Eric Wang	622 Broadway Pl.		Indianapolis	IN	46202-3501
Current Resident	622 East 10th Street	Apt. 207	Indianapolis	IN	46202
Current Resident	623 Lockerbie Street		Indianapolis	IN	46202
Current Resident	624 Woodruff Place Middle Drive		Indianapolis	IN	46201
Current Resident	6265 Valleyview Drive		Fishers	IN	46038
Gavin Railing	630 Broadway Pl.		Indianapolis	IN	46202-3501
Current Resident	630 E Terrace Avenue		Indianapolis	IN	46203
Current Resident	630 E. 13th Street		Indianapolis	IN	46202
Current Resident	630 N. College Ave.	Apt. 402	Indianapolis	IN	46204
Current Resident	6308 Wallard Dr.	#E	Indianapolis	IN	46224
St Joseph Square LLC	6357 Sharon Hills Rd.		Charlotte	NC	28210-7042
Robert Jr. Barnes	636 E. 11th St.		Indianapolis	IN	46202-2770
Current Resident	640 E Michigan St.	Apt. B326	Indianapolis	IN	46202
Current Resident	640 E. Michigan	Unit B128	Indianapolis	IN	46202
Dak Investments LLC	6402 Cornell Ave.		Indianapolis	IN	46220-1142
Current Resident	641 E. 34th Street		Indianapolis	IN	46205
Current Resident	645 E. 9th Street		Indianapolis	IN	46202
Current Resident	646 E. St. Clair St.		Indianapolis	IN	46202
Cole Incorporated	651 Round Hill Rd.		Indianapolis	IN	46260-2915
Earl & Stella Heil	6517 Heil Rd.		Henryville	IN	47126-9052
Current Resident	655 E. 13th St.		Indianapolis	IN	46202
Current Resident	657 E. Merrill St.		Indianapolis	IN	46203
Current Resident	660 Ellsworth St.		Indianapolis	IN	46202
Current Resident	6618 Moss Creek Place		Indianapolis	IN	46237
David Sherry	6749 Homestead Dr.		Indianapolis	IN	46227-5005
Current Resident	675 Woodruff Place West Dr.		Indianapolis	IN	46201
Herbert Ford	700 N. Alabama St.	Apt. 1508	Indianapolis	IN	46204-0000
Current Resident	702 Dorman Street		Indianapolis	IN	46202
Current Resident	706 Massachusetts Ave.	#201	Indianapolis	IN	46204
Current Resident	708 E. 11th St.		Indianapolis	IN	46202
Current Resident	709 E. Vermont Ave.		Indianapolis	IN	46202

North Split Legal Notice of Public Hearing Mailing List

Current Resident	709 Fulton St.		Indianapolis	IN	46202
Current Resident	711 E. Washington St.		Indianapolis	IN	46202
Current Resident	714 N. Highland Ave.		Indianapolis	IN	46202
Charles Jackson	715 E. 14th St.		Indianapolis	IN	46202-2702
Edwin Newton	716 E. 14th St.		Indianapolis	IN	46202-2703
Current Resident	716 E. 14th Street		Indianapolis	IN	46204
Current Resident	718 Sanders Street		Indianapolis	IN	46203
Current Resident	721 Elm St.		Indianapolis	IN	46203
Current Resident	723 Lincoln St.		Indianapolis	IN	46203
Current Resident	726 Blake St.	Apt. A	Indianapolis	IN	46202
Current Resident	726 Lord St.		Indianapolis	IN	46202
Current Resident	739 W. 11th St.	Apt. 13	Indianapolis	IN	46202
Louie Quattro LLC	740 E. North St.		Indianapolis	IN	46202-0000
J R Systems INC	7400 N. Shadeland Ave.	Ste. 200	Indianapolis	IN	46250-0000
Lee Anne Brooks	743 E. New York St.		Indianapolis	IN	46202-3746
Edmund Powell	7436 W. Henry St.		Indianapolis	IN	46231-1144
Current Resident	746 Kappes Street		Indianapolis	IN	46221
Current Resident	752 E. Market St.		Indianapolis	IN	46202
Current Resident	759 Fletcher Ave.		Indianapolis	IN	46203
Current Resident	7711 Oakshot Lane		Indianapolis	IN	46268
Current Resident	773 Woodruff Place E. Dr.		Indianapolis	IN	46201
D & P Investment LLC	7801 Valley Stream Dr.		Indianapolis	IN	46237-8538
Current Resident	806 N. Hamilton Ave.		Indianapolis	IN	46201
Current Resident	8116 Harshaw Dr.		Indianapolis	IN	46239
Current Resident	815 BlackBerry Dr.		Greenwood	IN	46143
Current Resident	816 Pomeroy St.		Indianapolis	IN	46221
Current Resident	818 Pomeroy St.		Indianapolis	IN	46202
Current Resident	825 Gardenbrook Circle	Apt. J	Indianapolis	IN	46202
Current Resident	827 S. Randolph St.		Indianapolis	IN	46203
Current Resident	833 River Ave.		Indianapolis	IN	46221
Current Resident	835 Noble St.		Indianapolis	IN	46203
Current Resident	835 Parkway Avenue		Indianapolis	IN	46203
Current Resident	836 Noble St.		Indianapolis	IN	46203
Current Resident	840 Broadway St.		Indianapolis	IN	46202
Current Resident	845 Greer St.		Indianapolis	IN	46203
Current Resident	845 Woodruff Place West Drive		Indianapolis	IN	46201
Current Resident	853 N. Rural		Indianapolis	IN	46201
Current Resident	857 N. Rural St.		Indianapolis	IN	46201

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Current Resident	871 Woodruff Place East Dr.		Indianapolis	IN	46201
Current Resident	872 Blake Street, A		Indianapolis	IN	46202
Current Resident	875 Massachusetts Ave.	Unit 317	Indianapolis	IN	46204
Current Resident	875 Woodruff Place West Drive		Indianapolis	IN	46201
Elaine McGill	8828 Shetland Ln.		Indianapolis	IN	46278-1068
Myron Place Homeowner's Association INC	8910 Purdue Rd.		Indianapolis	IN	46268-0000
Current Resident	901 N. College Ave.		Indianapolis	IN	46202
Lexington 1214 LLC	902 N. Capitol Ave.		Indianapolis	IN	46204-1005
Current Resident	902 N. Meridian St.	Apt. 118	Indianapolis	IN	46204
Current Resident	902 N. Pennsylvania St.	Apt. 312	Indianapolis	IN	46204
Current Resident	903 E. Ohio St.		Indianapolis	IN	46202
Current Resident	903 N. Beville Ave.		Indianapolis	IN	46201
Indpls Stage Rentals INC	905 Massachusetts Ave.		Indianapolis	IN	46202-3443
Current Resident	907 E. Michigan St.		Indianapolis	IN	46202
Current Resident	907 Paca St.		Indianapolis	IN	46202
Jimmie E. Johnson INC	908 E. Michigan St.		Indianapolis	IN	46202-3626
Pettigina LLC	914 E. New York St.		Indianapolis	IN	46202-3729
Dan Haines Construction	915 Daly St.		Indianapolis	IN	46202-3921
Current Resident	916 E. Michigan St.		Indianapolis	IN	46202
Current Resident	917 Massachusetts Ave.		Indianapolis	IN	46204
Wyndham Partners LLC	919 N. East St.		Indianapolis	IN	46202-3425
Roop Real Estate	920 E. Ohio St.		Indianapolis	IN	46202-3835
Current Resident	920 Woodruff Place East Drive		Indianapolis	IN	46201
Current Resident	921 E. Washington St.		Indianapolis	IN	46202
Current Resident	922 E. Morris St.		Indianapolis	IN	46203
Current Resident	922 Massachusetts Ave.		Indianapolis	IN	46202
Take 3 Investments LLC	9222 Stones Bluff Pl.		Camby	IN	46113-8247
Current Resident	923 N. Alabama St.		Indianapolis	IN	46202
Current Resident	929 E. New York St.		Indianapolis	IN	46202
Current Resident	930 Daly St.		Indianapolis	IN	46202
Current Resident	930 Massachusetts Ave.		Indianapolis	IN	46202
Current Resident	930 N. Park Ave.		Indianapolis	IN	46202
Current Resident	930 Prospect St.	Apt. 203	Indianapolis	IN	46203
Robert Regester	931 Bellefontaine St.		Indianapolis	IN	46202-3401
Current Resident	931 Broadway St.		Indianapolis	IN	46202
Current Resident	931 Fletcher Ave.	Apt. 326	Indianapolis	IN	46203
Current Resident	934 E. Minnesota St.		Indianapolis	IN	46203
Kevin Stuckwisch	935 Bellefontaine St.		Indianapolis	IN	46202-3401

North Split Legal Notice of Public Hearing Mailing List

Current Resident	935 N. Alabama St.		Indianapolis	IN	46202
Current Resident	939 Eastern Avenue		Indianapolis	In	46201
Current Resident	942 E. Michigan St.		Indianapolis	IN	46202
College 1101 LLC	9425 N. Meridian St.		Indianapolis	IN	46260-1308
Boyle Group	9430 Timber Crest Ln.		Indianapolis	IN	46256-8411
Current Resident	947 Shelby St.		Indianapolis	IN	46203
Clarian Health Partners INC	950 N. Meridian St.	Ste. 1200	Indianapolis	IN	46204-0000
Current Resident	952 Camp Street		Indianapolis	IN	46202
Current Resident	954 N. Highland Ave.		Indianapolis	IN	46202
Current Resident	958 Hosbrook Street		Indianapolis	IN	46203
Current Resident	959 Dorman St.		Indianapolis	IN	46202
Current Resident	966 East Drive		Indianapolis	IN	46201
James Wolfinger	9665 Killingsworth Ct.		Indianapolis	IN	46256-9784
Current Resident	PO Box 10908		Merrillville	IN	46411
Salvation Army	PO Box 88517		Indianapolis	IN	46208-0517
US Sprint Communications	PO Box 12913		Shawnee Mission	KS	66282-2913
Delaware Court Associates	PO Box 1422		Indianapolis	IN	46206-1422
Paul Dolan	PO Box 186		Bangor	ME	04402-0186
Patrick Investments LLC	PO Box 22116		Indianapolis	IN	46222-0000
Schaefer, Philip Greene Decker as Trustee	PO Box 2426		Indianapolis	IN	46206-2426
Trudy Slaby	PO Box 40721		Indianapolis	IN	46240-0721
Brad & Philip Aaron	PO Box 93		Fortville	IN	46040-0093

**I-65/I-70 North Split Project Community Advisory Committee (CAC) List**

<b>Organization</b>	<b>Contact Name</b>	<b>Title</b>	<b>Email</b>
<b>Government/Municipality</b>			
City-County Council	Vop Osili	President and Council Member, District 11	<a href="mailto:voposili@gmail.com">voposili@gmail.com</a>
Mayor's Neighborhood Advocate (Area #8)	James Wells	Mayor's Advocate	<a href="mailto:james.wells2@indy.gov">james.wells2@indy.gov</a>
Mayor's Neighborhood Advocate (Area #9)	Ike McCoy	Mayor's Advocate	<a href="mailto:isaac.mccoy@indy.gov">isaac.mccoy@indy.gov</a>
Mayor's Neighborhood Advocate (Area #10)	Ruth Morales	Mayor's Advocate	<a href="mailto:ruth.morales@indy.gov">ruth.morales@indy.gov</a>
Indianapolis Department of Public Works	Daniel Parker	Director	<a href="mailto:daniel.parker@indy.gov">daniel.parker@indy.gov</a>
Indianapolis Department of Public Works	Mark Zwoyer	Design Administrator	<a href="mailto:mark.zwoyer@indy.gov">mark.zwoyer@indy.gov</a>
Indianapolis Metropolitan Planning Organization	Anna Gremling	Executive Director	<a href="mailto:anna.gremling@indympo.org">anna.gremling@indympo.org</a>
Indianapolis Metropolitan Planning Organization	Jen Higginbotham	Senior Planner	<a href="mailto:jen.higginbotham@indympo.org">jen.higginbotham@indympo.org</a>
Indianapolis Historic Preservation Commission	Meg Purnsley	Administrator	<a href="mailto:meg.purnsley@indy.gov">meg.purnsley@indy.gov</a>
City of Fishers	Scott Fadness	Mayor	<a href="mailto:mayorfadness@fishers.in.us">mayorfadness@fishers.in.us</a>
City of Greenwood	Mark W. Myers	Mayor	<a href="mailto:mayor@greenwood.in.gov">mayor@greenwood.in.gov</a>
City of Zionsville	Emily Styron	Mayor	<a href="mailto:estyron@zionsville-in.gov">estyron@zionsville-in.gov</a>
City of Whitestown	Jason Lawson	Town Manager	<a href="mailto:jlawson@whitestown.in.gov">jlawson@whitestown.in.gov</a>
City of Carmel	Jim Brainard	Mayor	<a href="mailto:jbrainard@carmel.in.gov">jbrainard@carmel.in.gov</a>
Hendricks County Plan Commission	Timothy Dombrosky	Director	<a href="mailto:tdombrosky@co.hendricks.in.us">tdombrosky@co.hendricks.in.us</a>
Boone County Plan Commission	Nick Parr	Operations Manager	<a href="mailto:nparr@co.boone.in.us">nparr@co.boone.in.us</a>

Brown County Planning Commission	Christine Ritzmann	Director	<a href="mailto:ritzmannc@browncounty-in.us">ritzmannc@browncounty-in.us</a>
White River Township	Mark Messick	Township Trustee	<a href="mailto:trustee@whiterivertownship.org">trustee@whiterivertownship.org</a>
<b>Utilities</b>			
Citizens Energy Group	Joe Sutherland	Director of Government and External Relations	<a href="mailto:JSutherland@citizensenergygroup.com">JSutherland@citizensenergygroup.com</a>
<b>Large Employers</b>			
Cummins	Lawrence McCormack	Manager, State Government Relations	<a href="mailto:lawrence.mccormack@cummins.com">lawrence.mccormack@cummins.com</a>
NCAA	Stacey Osburn	Director, Strategic Communications	<a href="mailto:sosburn@naaa.org">sosburn@naaa.org</a>
Salesforce	Amy Waggoner	Director, Midwest State & Local Government Affairs	<a href="mailto:awaggoner@salesforce.com">awaggoner@salesforce.com</a>
Rolls-Royce	Joel Reuter	Vice President , Communications and Marketing Services	<a href="mailto:joel.reuter@rolls-royce.com">joel.reuter@rolls-royce.com</a>
Indiana State Personnel Department	Britni Saunders	Executive Director	<a href="mailto:bsaunders@spd.in.gov">bsaunders@spd.in.gov</a>
<b>Event/Tourism/Retail with Significant Traffic</b>			
Bankers Life Fieldhouse	Danny Lopez	Vice President, External Relations and Corporate Communications	<a href="mailto:DLopez@PACERS.com">DLopez@PACERS.com</a>
Victory Field	Cheyne Reiter	Director of Communications	<a href="mailto:creiter@indyindians.com">creiter@indyindians.com</a>
Lucas Oil Stadium/Indiana Convention Center	Paul Suiters	Security Manager	<a href="mailto:Paul.Suiters@ICCLOS.com">Paul.Suiters@ICCLOS.com</a>
Mass Ave Merchants Association	Meg Storrow	Vice Chair for Strategic Planning	<a href="mailto:storrow@storrowkinsella.com">storrow@storrowkinsella.com</a>
Sun King Brewing	Ben Shine	Community Development Director	<a href="mailto:bshine@sunkingbrewing.com">bshine@sunkingbrewing.com</a>
Indiana Sports Corp	Ryan Vaughn	President	<a href="mailto:rvaughn@indianasportscorp.org">rvaughn@indianasportscorp.org</a>
Visit Indy	Morgan Snyder	Senior Communications Manager	<a href="mailto:msnyder@visitindy.com">msnyder@visitindy.com</a>
Eitlejorg Museum	Bryan Corbin	Director of Public Relations	<a href="mailto:bcorbin@eitlejorg.com">bcorbin@eitlejorg.com</a>

### Business-Serving Organizations

Greater Indianapolis Progress Committee	Beth White	Executive Director	<a href="mailto:beth.white@indygipc.org">beth.white@indygipc.org</a>
Indy Chamber	Mark Fisher	Chief Policy Officer	<a href="mailto:mfisher@indychamber.com">mfisher@indychamber.com</a>
Indiana Chamber	Greg Ellis	Infrastructure Lobbyist	<a href="mailto:gellis@indianachamber.com">gellis@indianachamber.com</a>
Indiana Restaurant and Lodging Association	Gabby Brock	Director of Advocacy and Communications	<a href="mailto:gbrock@tammcapitalgroup.com">gbrock@tammcapitalgroup.com</a>
Downtown Indy	Sherry Seiwert	President	<a href="mailto:sherry@downtownindy.org">sherry@downtownindy.org</a>
Interstate Business Group	Paul Knapp	Lead Organizer	<a href="mailto:pknapp@yandl.com">pknapp@yandl.com</a>
MIBOR REALTOR® Association	Chris Pryor	Sr. Vice President of Government and Community Relations	<a href="mailto:chrispryor@mibor.com">chrispryor@mibor.com</a>

### Facility Users

Indiana Motor Truck Association	Gary Langston	President	<a href="mailto:Gary@intrucking.org">Gary@intrucking.org</a>
IndyGo	Inez Evans	President & CEO	<a href="mailto:ievans@indygo.net">ievans@indygo.net</a>
Central Indiana Regional Transportation Authority	Jennifer Gebhard	Commuter Connect Program Manager	<a href="mailto:jgebhard@cirta.us">jgebhard@cirta.us</a>
Indianapolis Cultural Trail	Kären Haley	Executive Director	<a href="mailto:khaley@indyculturaltrail.org">khaley@indyculturaltrail.org</a>

### Special Interest Groups

Black Expo	Alice Watson	VP of Operations and Project Management	<a href="mailto:awatson@indianablackexpo.com">awatson@indianablackexpo.com</a>
Citizens Action Coalition	Kerwin Olson	Executive Director	<a href="mailto:kolson@citact.org">kolson@citact.org</a>
Hoosier Environmental Council	Jesse Kharbanda	Executive Director	<a href="mailto:jkharbanda@hecweb.org">jkharbanda@hecweb.org</a>
Indiana Landmarks	Marsh Davis	President	<a href="mailto:mdavis@indianalandmarks.org">mdavis@indianalandmarks.org</a>
Keep Indianapolis Beautiful	Joe Jarzen	Vice President of Program Strategy	<a href="mailto:jjarzen@kibi.org">jjarzen@kibi.org</a>

Local Initiatives Support Corporation	Tedd Grain	Deputy Director	<a href="mailto:TGrain@lisc.org">TGrain@lisc.org</a>
Strong Indy	Russell Menyhart	Co-Founder	<a href="mailto:rmenyhart@taftlaw.com">rmenyhart@taftlaw.com</a>
King Park Development Corp.	Steven Meyer	Executive Director	<a href="mailto:smeyer@kingpark.org">smeyer@kingpark.org</a>
American Institute of Architects - Indiana Chapter	Mark Beebe		<a href="mailto:mbeebe@lancerbeebe.com">mbeebe@lancerbeebe.com</a>
Indianapolis' Concerned Clergy	David Greene	President	<a href="mailto:dgreene@purposeoflifeministries.com">dgreene@purposeoflifeministries.com</a>
Purpose of Life Ministries	Tony Alexander	Communications & Economics Chairman	<a href="mailto:aalexander@purposeoflifeministries.com">aalexander@purposeoflifeministries.com</a>
Health by Design	Kim Irwin	Executive Director, Alliance for Health Promotion	<a href="mailto:kirwin@hbdin.org">kirwin@hbdin.org</a>
Marion County Public Health Department	Sandy Cummings	Administrator, Chronic Disease Programs	<a href="mailto:SCummings@MarionHealth.org">SCummings@MarionHealth.org</a>
American Society of Landscape Architects - Indiana Chapter	April Westcott	Member at Large	<a href="mailto:office@inasla.org">office@inasla.org</a>
Indiana Chapter of the American Planning Associations (APA-IN)	Katie Bannon	Past President	<a href="mailto:kibannon@gmail.com">kibannon@gmail.com</a>
<b>Schools</b>			
Indianapolis Public Schools	Sarah Robinson Chin	Director of Strategy & Planning	<a href="mailto:robinsonsarah@myips.org">robinsonsarah@myips.org</a>
IUPUI	Jennifer Boehm	Assistant Vice Chancellor, Office of Community Engagement	<a href="mailto:jrboehm@iupui.edu">jrboehm@iupui.edu</a>
<b>Neighborhoods</b>			
Chatham-Arch Neighborhood	Ken Avidor	Board Member	<a href="mailto:ken.avidor@gmail.com">ken.avidor@gmail.com</a>
Cottage Home Neighborhood	Andy Beck	Conservation Committee Chair	<a href="mailto:andybeck95@gmail.com">andybeck95@gmail.com</a>
Lockerbie Square Neighborhood	Marjorie Kienle		<a href="mailto:mlkienle@indy.rr.com">mlkienle@indy.rr.com</a>
Old Northside Neighborhood	Dan Mullendore		<a href="mailto:bookem4096@gmail.com">bookem4096@gmail.com</a>
Historic Urban Neighborhoods of Indianapolis	Garry Chilluffo	President	<a href="mailto:garry@chilluffo.com">garry@chilluffo.com</a>

Holy Cross Neighborhood	Scott Wilson		<a href="mailto:Scotty@Scotty.me">Scotty@Scotty.me</a>
Windsor Park Neighborhood	Burns Gutzwiller	Lane Use Committee Co-Chair	<a href="mailto:burnsgutzwiller@gmail.com">burnsgutzwiller@gmail.com</a>
St. Joseph Neighborhood	Mark Godley	President	<a href="mailto:mgodley@chestnut.org">mgodley@chestnut.org</a>
Cole-Noble Neighborhood	Bruce Buchanan	President	<a href="mailto:bbuchanan@buchanangroup.org">bbuchanan@buchanangroup.org</a>
Fletcher Place Neighborhood	Glenn Blackwood		<a href="mailto:glennblackwood@gmail.com">glennblackwood@gmail.com</a>
Martindale-Brightwood Neighborhood	Elizabeth Gore		<a href="mailto:silversheba14@msn.com">silversheba14@msn.com</a>
Ransom Place Neighborhood	Paula Brooks		<a href="mailto:haizlip@gmail.com">haizlip@gmail.com</a>
Meridian Kessler Neighborhood Association	Chelsea Marburger	Executive Director	<a href="mailto:chelsea@mkna.org">chelsea@mkna.org</a>
Nora-Northside Community Council	Anthony Burke, Sr.	Secretary (also a neighborhood liason for the Marion County Health Department)	<a href="mailto:anthonybrk7@gmail.com">anthonybrk7@gmail.com</a>
Fountain Square	Tad Aschliman	Resident	<a href="mailto:tad.indy@gmail.com">tad.indy@gmail.com</a>
North Square Neighborhood	Jordan Ryan		<a href="mailto:jordanblairryan@gmail.com">jordanblairryan@gmail.com</a>
Riley Area Development Corporation	Chelsea Humble	North Mass Program Manager	<a href="mailto:chelsea.humble@rileyarea.org">chelsea.humble@rileyarea.org</a>

## Kia Gillette

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**From:** Kia Gillette  
**Sent:** Wednesday, July 15, 2020 12:30 PM  
**To:** aalexander@purposeoflifefeministries.com; andybeck95@gmail.com; anthonybrk7@gmail.com; awaggoner@salesforce.com; awatson@indianablackexpo.com; bbuchanan@buchanangroup.org; bcorbin@eiteljorg.com; beth.white@indygipc.org; bookem4096@gmail.com; bsaunders@spd.in.gov; bshine@sunkingbrewing.com; burnsgutzwiller@gmail.com; Chelsea Humble (chelsea.humble@rileyarea.org); chelsea@mkna.org; chrispryor@mibor.com; creiter@indyindians.com; Daniel Parker (Daniel.Parker@indy.gov); dgreene@purposeoflifefeministries.com; estyron@zionsville-in.gov; Garry Chilluffo; gary@intrucking.org; gbrock@tammcapitalgroup.com; gellis@indianachamber.com; Glenn Blackwood; Gremling, Anna M.; haizlip@gmail.com; ievans@indygo.net; Isaac McCoy (isaac.mccoy@indy.gov); james.wells2@indy.gov; jbrainard@carmel.in.gov; Jen.higginbotham@indympo.org; jgebhard@cirta.us; jkharbanda@hecweb.org; jlawson@whitestown.in.gov; Joe Jarzen; joel.reuter@rolls-royce.com; Jordan Ryan; jrboehm@iupui.edu; jsutherland@citizensenergygroup.com; Ken Avidor; khaley@indyculturaltrail.org; kirwin@hbdin.org; kjbannon@gmail.com; kolson@citact.org; Lawrence.mccormack@cummins.com; Lopez, Danny; Marjorie Kienle; Mark Beebe; Mark Godley; Marsh Davis (mdavis@indianalandmarks.org); mayor@greenwood.in.gov; mayorfadness@fishers.in.us; 'Meg Storrow'; mfisher@indychamber.com; msnyder@visitindy.com; nparr@co.boone.in.us; office@inasla.org; Paul Knapp (pknapp@yandl.com); paul.suiters@icclos.com; Purnsley, Meg T; ritzmann@browncounty-in.us; rmenyhart@taftlaw.com; robinsonsarrah@myips.org; Ruth Morales (ruth.morales@indy.gov); rvaughn@indianasportscorp.org; sandy.cummings; scotty@scotty.me; Sherry Seiwert (sherry@downtownindy.org); silversheba14@msn.com; smeyer@kingpark.org; sosburn@naaa.org; tad.indy@gmail.com; tdombrosky@co.hendricks.in.us; Tedd Grain (tgrain@lisc.org); trustee@whiterivertownship.org; voposili@gmail.com  
**Cc:** Runfa Shi (rshi@indot.IN.gov); bshattuck@indot.IN.gov; Laura Hilden (lhilden@indot.IN.gov); 'Miller, Brandon'; Ronald Bales (rbales@indot.IN.gov); John W. Myers; Michelle Allen (michelle.allen@dot.gov); Andrew Dietrick (adietrick@indot.in.gov); Scott Manning (smanning1@indot.in.gov); Seth Schickel (sschickel@HNTB.com)  
**Subject:** North Split CAC Meeting, Virtual Public Information Meeting, and Public Hearing  
**Attachments:** North Split Public Hearing Flier.pdf

Dear North Split Community Advisory Committee (CAC) Members,

The Environmental Assessment (EA) for the I-65/I-70 North Split Interchange Reconstruction will be available for public review and comment beginning Friday, July 17, 2020. INDOT is hosting two sessions – one virtual public information meeting and one in-person public hearing – to present the EA. We wanted to provide you with some information and updates:

1. **CAC Meeting:** We would like to provide a preview of the virtual public information meeting/public hearing presentation at a virtual CAC Meeting on **Monday, July 27, 2020** from **1 to 3 p.m.** The CAC meeting will be conducted online via the WebEx online meeting tool. When the Outlook calendar invitation for the meeting is sent, it will include the WebEx information and a meeting agenda. To join the meeting, click the “Join Meeting” button in your Outlook calendar invitation – either on a computer or on your smartphone. If you plan to join the meeting via audio only, please let us know, and we will make the PowerPoint presentation available to you for download in advance of the meeting.

2. **Virtual Public Information Meeting:** A virtual public information meeting will be conducted on **Thursday, July 30, 2020, at 5 p.m.** Eastern time. The presentation will be conducted via WebEx and will be identical to the in-person public hearing presentation. A link to access the online presentation and instructions will be made available at [www.northsplit.com/ea-sessions](http://www.northsplit.com/ea-sessions). The virtual public information meeting will also be broadcast on Indianapolis Government Access Channel 16.
  
3. **Public Hearing:** The general public is invited to participate in an in-person Public Hearing on **Monday, August 3, 2020** at Ivy Tech Culinary & Conference Center, 2820 North Meridian Street, Indianapolis 46208. Social distancing and face covering requirements will be followed, per the July 9 Marion County mandate. Doors will open at 4 p.m. Eastern Time, and there will be formal presentations at 4:30 p.m. and 6 p.m. Verbal statements will be accepted during a public comment session immediately following the formal presentations. Comments may also be submitted prior to the public hearing and within the comment period – July 17, 2020, through August 17, 2020 – in the following ways:
  - The North Split website comment form: <https://northsplit.com/contact-us/>
  - Email to [info@northsplit.com](mailto:info@northsplit.com)
  - Mail to the North Split PO Box at P.O. Box 44141, Indianapolis, IN 46244
  - A toll-free telephone line with voice mailbox at 1-877-799-6570

Attached is a flier with more information about the virtual public information meeting and the Public Hearing. **Please help us communicate information about the virtual public information meeting and the Public Hearing to your colleagues, neighbors, and friends by forwarding this information and the attached flier.**

Please let me know if you have any questions.

Thank you,  
Kia

**Kia Gillette**

Environmental Project Manager

Tel (317) 917-5240 Cell (317) 695-0825 Email [kgillette@hntb.com](mailto:kgillette@hntb.com)

**HNTB CORPORATION**

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## MEETING AGENDA

**Date:** July 27, 2020

**Time:** 1 to 3 p.m.

**Meeting:** North Split Community Advisory Committee Meeting #6

**Location:** Meeting conducted online via WebEx

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1. Welcome & Introductions
2. CAC Meeting Format
3. Public Hearing Format
4. EA Availability/Formal Comment Opportunities
5. Purpose and Need
6. Alternatives/Preferred Alternative
7. Environmental Impacts
  - a. Historic Properties
  - b. Highway Noise
  - c. Environmental Justice (EJ)
  - d. Traffic Impacts
8. Context Sensitive Solutions (CSS)
9. Next Steps
10. Discussion and Questions
11. Adjourn



## MEETING SUMMARY

**Date:** July 27, 2020  
**Time:** 1 to 3 p.m.  
**Meeting:** North Split Community Advisory Committee Meeting #6  
**Location:** Meeting conducted online via WebEx

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*\*Complete attendee list begins on page 11.*

### 1) Welcome & Introductions

Kia Gillette from HNTB welcomed Community Advisory Committee (CAC) members and introduced everyone on the WebEx call.

The North Split Project Team wanted to share the public hearing presentation with the CAC before the public hearing. She reviewed the upcoming public meetings and logistics for the CAC meeting.

- The Virtual Public Information Meeting will be July 30 at 5 p.m. The meeting will also be broadcast on Channel 16 for those who do not have internet access.
- The August 3 in-person public hearing will 4 to 7 p.m. at the Ivy Tech Culinary and Conference Center. The presentation will be the same as the CAC presentation, except for adjustments to introductory slides.
- Pauses are built into today's presentation for questions. Those pauses will not be included in the public hearing presentation.
- CAC Members are asked to hold their questions until the pause points or type them into the WebEx chat feature. During the pauses, participants can also ask questions verbally.
- The presentation is a summary of the North Split Project, and much of the information will look familiar to CAC members. However, the Project Team has some new information about the Commerce Avenue/Roosevelt Avenue bridge to share.
- The in-person public hearing format will include a presentation by three Project Team speakers, Kia Gillette, the Environmental Lead for HNTB; Seth Schickel the Project Manager for HNTB; and Ron Taylor from TSW Design Group, the Urban Design Lead.
- At the public hearing, formal verbal comments will be taken for the project record immediately following the presentation. To allow time for formal public comments, a Question and Answer session will not occur following the presentation.
- The Project Team will not answer individual questions posed during the public hearing's formal comment period, but a written comment/response document will be prepared following the comment period for the project record.
- Display boards will be available on the project website for viewing before and after the presentation, and the Project Team will answer questions at that time.

Kia then reviewed the CAC meeting agenda with attendees.

## 2) EA Availability/Opportunities to Make Formal Comments

The Environmental Assessment (EA) can be found at:

- The North Split Project website, [northsplit.com/ea](http://northsplit.com/ea)
- HNTB's downtown Indianapolis office
- Four downtown-area public libraries:
  - Central Library
  - Spades Park Branch Library
  - Garfield Park Branch Library
  - Martindale-Brightwood Branch Library

Kia noted that the document is in three large binders.

The public hearing presentation and display boards can be found at:

- The Project website: [northsplit.com/ea-sessions](http://northsplit.com/ea-sessions)
- A new North Split virtual project office that is being launched and will be live later today (July 28, 2020). The virtual project office includes much of the same information as the North Split Project website but is organized differently. The virtual project office includes this presentation and an audio recording of the presentation if people are unable to attend the virtual public meeting or public hearing.

There are several opportunities for members of the public to make formal comments. Formal public comments are all "equal." One method of submission is not superior to another. Public comments may be made:

- Verbally at the public hearing and transcribed by a court reporter
- Verbally via a toll-free telephone number with voice mail recording
- In writing on comment cards at the public hearing
- In writing submitted via the North Split email – [info@northsplit.com](mailto:info@northsplit.com)
- In writing via the Project website at [northsplit.com/contact-us](http://northsplit.com/contact-us)
- In writing and mailed to P.O. Box 44141, Indianapolis, IN 46244

The formal comment period for the EA ends August 17, 2020. Kia asked all CAC members to please submit any comments by that date.

Kia provided an overview of the North Split Project:

- The North Split is where I-65 and I-70 meet at the northeast corner of the downtown Indianapolis inner loop.
- It is the busiest interchange in the region and the second-busiest in Indiana, with more than 214,000 vehicles traveling it per day.
- The North Split was constructed in the 1960s and 1970s, and the pavement and bridges need to be replaced.
- The interchange has safety concerns, with more than 1,600 crashes between 2012 and 2016.
- The interchange was originally designed to have a fourth leg going to the northeast side of Indianapolis. That leg will never be constructed.

### 3) Purpose and Need

Kia reviewed the Purpose and Need for the North Split Project. One of reasons the project is needed is because of the poor condition of the interchange, which has deteriorating bridges and pavement. The infrastructure is past its useful life.

- Most North Split components are more than 50 years old.
- Thirty-two bridges need rehabilitation or replacement due to their poor structural condition.
- Existing pavement requires constant repair and patching due to condition and age, which is not cost effective.
- There were 1,600 crashes between 2012 and 2016 on the North Split. Most of the crashes were rear-end crashes due to congestion and stopped traffic. The second most frequently occurring crashes were sideswipe crashes due to congestion and weaving movements.
- The interchange has merges, weaving, and lane changes occurring over short distances. This creates numerous crashes, driver confusion, and poor traffic flow.

Two weaving areas along the west leg of the interchange cause the most congestion and have the highest crash rate in the project area. One is at Pennsylvania Street, where drivers traveling northbound on I-65 must cross all westbound traffic from I-70 to get to the Pennsylvania Street exit. Drivers only have a short distance in which to weave.

The other area is the Delaware Street entrance ramp, where drivers entering the interchange must cross I-65 southbound and I-65 to the collector-distributor roads to get to I-70 east. Research shows that most traffic entering from the Delaware Street ramp is traveling to I-70 eastbound.

The Purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities within the North Split project area. The Project is needed to:

- Correct deteriorated bridge conditions
- Correct deteriorated pavement conditions
- Improve safety
- Improve interchange operations and reduce congestion

#### Pause for Questions

Kia paused the presentation for questions. There were no questions.

### 4) Alternatives/Preferred Alternative

Seth Schickel from HNTB reviewed the North Split Interchange design alternatives that were evaluated. These alternatives were provided for public review in the Alternatives Screening Report. The alternatives ranged from doing nothing (No Build) to expanding the interchange by adding more through lanes.

- Three alternatives – Alternative 1 (No Build), Alternative 2 (Transportation System Management), and Alternative 3 (Bridge and Pavement Replacement In Kind) – were eliminated during the first stage of evaluation. None of these alternatives addressed the safety and congestion problems in the Purpose and Need.

- Alternative 5 (Keeping All Ramp Connections and Added Through Lanes) was also eliminated. Although it would meet the Purpose and Need of the project, the impact of widening the interstate was unacceptable.
- Alternative 4, which improves existing conditions and does not add through lanes, provides the best balance of meeting the purpose and need, and environmental impacts. Three variations of Alternative 4 were developed:
  - Alternative 4a would close the ramps at Pennsylvania Street and Delaware Street entirely, eliminating the traffic weaves. While the footprint of the interstate would be the same as the existing interchange, this alternative would have the greatest traffic impacts because all access to the two streets would be lost.
  - Alternative 4b would provide full access to Pennsylvania Street and Delaware Street while eliminating the weaves. However, this alternative would require widening the interstate footprint on both sides, requiring high retaining walls to stay within the existing right-of-way.
  - Alternative 4c represents a compromise solution. It would have select ramp restrictions but would provide most traffic movements at Pennsylvania Street and Delaware Street that exist today. There would be minimal widening of the interstate footprint and moderate retaining walls.

After conducting public meetings and soliciting community input, the North Split Project Team determined that Alternative 4c would provide the best balance of traffic service and impacts. Alternative 4c was selected as the preferred alternative because it:

- Meets the Project's Purpose and Need
  - New pavement and bridges
  - Corrects the worst safety problems
  - Removes the worst bottlenecks
- Avoids major environmental impacts
  - Smaller, more compact footprint
  - Minimal widening with shorter retaining walls
  - Within the existing right-of-way

The compromise for Alternative 4c is that there will be no access to Pennsylvania Street from I-70. Traffic models show that this traffic would primarily divert to the Michigan Street or Ohio Street ramps, with minimal diversion to West Street.

The Delaware Street entrance ramp will continue to access I-70 east but will no longer access I-65 south or the collector-distributor road leading to the Michigan Street, Ohio Street, and Fletcher Avenue ramps. Traffic counts show relatively small volumes of traffic travel to these exits from the Delaware Street entrance ramp.

#### Pause for Questions

Seth paused the presentation for questions. There were no questions.

### **5) Environmental Impacts**

Kia said the EA document, which is in the middle of a public comment period, is a requirement of the National Environmental Policy Act (NEPA). The EA analyzes impacts to both the human

and natural environments. Following the public comment period for the EA, the Federal Highway Administration (FHWA) will make one of two determinations:

- Finding of No Significant Impact (FONSI), and the NEPA process will end; or
- Significant project impacts, which will require the preparation of an Environmental Impact Statement (EIS).

Kia reviewed some of the focus areas for the EA document but emphasized that these are not the only areas discussed in the EA. These focus areas include:

- Historic properties (Section 106)
- Highway noise
- Environmental Justice
- Traffic impacts of construction

### **Historic Properties Impacts**

Section 106 of the National Historic Preservation Act of 1966 protects historic districts and properties. As part of the Section 106 consultation process, adverse Effects were identified for four historic districts and/or properties:

- Old Northside Historic District/Morris Butler House
- St. Joseph Neighborhood Historic District
- Chatham-Arch Historic District

Mitigation commitments are identified as part of the Section 106 process to compensate for the diminishment of historic properties and are documented in a Memorandum of Agreement (MOA). The MOA includes commitments only for historic properties. The EA includes commitments from the MOA, plus additional commitments for other resources or impacts. Kia encouraged meeting participants to review the EA document if they are interested in seeing the other EA commitments.

### **Highway Noise Impacts**

The EA document also includes highway noise impacts. Five potential noise barriers were identified according to INDOT's Traffic Noise Policy, and two noise barriers were recommended based on benefited receptor surveys and other factors. Both recommended noise barriers are on the north side of I-70, east of the North Split. In addition to noise barriers, INDOT is using noise-reducing technologies to reduce noise throughout the project area. Those technologies include jointless paving and bridges, and next-generation pavement grooving.

### **Environmental Justice Impacts**

The EA document also looked at Environmental Justice (EJ) impacts. Kia noted that the presentation was only a summary of the EJ analysis, and she recognized that the EJ Working Group has been very helpful in the process.

EJ includes:

- Fair treatment and meaningful involvement of all people regardless of race or income.
- Identifying and addressing disproportionately high and adverse effects on minority or low-income populations.
- Equitable distribution of benefits and burdens of the project.

The EA Analysis included:

- Identifying potential EJ populations using Census data.
- Organizing and consulting with the EJ Working Group.
- Conducting the EJ public survey, which was open to everyone. The survey was heavily promoted via:
  - Email
  - Text
  - Social media
  - North Split Advisory Committees
  - IndyGo Transit Center
  - IndyGo bus ads

More than 1,600 surveys were completed, with similar EJ and non-EJ responses. No disproportionate impacts on minority or low-income populations were identified.

Kia noted that the EJ Impacts slide was a one-slide summary but encouraged participants to reference the EJ Technical Memorandum in the appendix of the EA document if they are interested in reviewing the analysis.

#### **Traffic Impacts of Construction**

Seth said the long-term traffic impacts of the North Split Project will be minimal because additional through lanes are not being added to the interchange. The major traffic impacts will occur during construction.

A detailed Maintenance of Traffic Plan is in development by the North Split Design-Build Team, per INDOT criteria. INDOT sets the overall closure plan and requirement notifications, so the extent of roadway closures is already known, and INDOT is implementing a Mobility Management Plan (MMP) to reduce traffic impacts during construction.

Seth reviewed the changes in downtown access during construction:

- The primary closure will be the main line of I-65 and I-70, which will be closed between Washington Street and the North Split. This will be closed for about two years, and through traffic normally traveling this area will be detoured around I-465.
- INDOT recognized the need to keep open specific traffic movements during construction:
  - The east-west link between I-65 and I-70 will remain open throughout construction, with two lanes open in each direction.
  - The Pine Street entrance ramp to I-70 east will remain open.
  - The westbound I-70 ramp to the collector-distributor road leading to Michigan Street and Ohio Street will be open throughout to provide access to downtown. However, the collector-distributor will be closed south of the Ohio Street ramp, including the Fletcher Avenue exit, to prevent use by through traffic.
  - Either the Michigan Street exit or the Ohio Street exit will remain open at all times. INDOT has required that both cannot be closed at the same time; however, one or the other will be closed for up to a year at a time.

Seth reviewed downtown bridge closures:

- All I-65/I-70 bridges over local streets in the North Split project area will be replaced, except Alabama Street and Commerce Avenue/Roosevelt Avenue. Local bridges will be closed for up to 90 days for reconstruction. Adjacent bridges will not be closed at the same time to reduce traffic impacts.
- The Washington Street bridge will be open throughout construction with lane closures only. Because of the width of the Washington Street bridge under the highway, construction can occur in stages.

Seth noted that adjacent bridges are not allowed to be closed at the same time, to reduce traffic impacts.

INDOT is administering a Mobility Management Plan (MMP) to reduce local traffic impacts. The MMP will be in place before construction begins and will be used throughout construction. The goals of the MMP are to:

- Optimize traffic operations on the available transportation network.
- Reduce overall roadway network demand.
- Provide enhanced motorist information.

MMP activity areas are:

- Maintenance Of Traffic/construction, which is the Design-Built Team's responsibility.
- Traffic Operations Management and a subgroup, Emergency Response, which will ensure emergency responder access throughout construction.
- Travel Demand Management (TDM).
- Real-Time Traveler Information Systems.

Traffic Operations Management for the North Split includes:

- Traffic monitoring: INDOT is working with the City of Indianapolis to upgrade traffic signals and monitoring throughout downtown Indianapolis. Most of this work will be done in 2020, with more than 400 signals being improved as part of the preparation for construction.
- Interchange improvements: The West Street/Dr. Martin Luther King, Jr. Street exit and the Washington Street entrance and exit ramps will be improved to help with traffic flow during construction. These will be completed in 2020.
- Spot improvements: These improvements are underway to improve efficiency on streets that serve downtown and will be completed in 2020.
- Motorist information: This includes wayfinding notifications and real-time traffic information.
- Incident management: INDOT will be working with Emergency Medical Services to establish an incident management plan to enable quick responses in and around the construction area for emergency responders.

Travel Demand Management for the North Split involves reducing peak period travel into and out of downtown. INDOT will be:

- Mode choice: Encouraging different modes of traffic, including transit, carpool/vanpool, and biking/walking.

- Trip reduction/reschedule: Encouraging staggered work hours, flex time, and working from home during heavily congested traffic periods.
- Public/employer TDM education program: Creating an education program for employers to inform and encourage alternate work arrangements.

INDOT will also be providing real-time traveler information, such as frequent bulletins, extensive communications, and technologies that deliver current information allowing travelers to decide how, when, and where to travel, or whether to travel at all. Information will be provided via:

- Social media
- Public broadcast and print media
- Changeable message freeway signs

Traffic apps is another way INDOT will communicate real-time travel information to the public, using apps like Waze and Google Travel.

#### Pause for Questions

Seth paused the presentation for questions. There were no questions.

### **6) Context Sensitive Solutions (CSS)**

Ron Taylor from TSW Design Group provided an overview of the Aesthetic Design Guidelines (ADG) developed for North Split Project. The purpose of the ADG is to provide the Design-Build Team and their landscape architects an aesthetic direction for the project design.

The ADG are the result of an extensive public engagement process over the last 12 months, including meetings with:

- Local neighborhoods and neighborhood organizations
- Local agencies and oversight departments
- Key local resource groups
- Local business organizations
- Local stakeholders and stakeholder groups

The CSS Process included visioning with the community, the development of preliminary design treatments, the creation of a CSS Design Guidelines package that was reviewed with the community, and development of specifications and standards details. The process was conducted with extensive public engagement, including:

- 12 neighborhood workshops with 15 different neighborhoods
- 2 local business group meetings
- 4 meetings with the Rethink Coalition
- Engaging with more than 400 residents
- Receiving more than 6,000 comments

Most of the visual elements for the North Split Project are grouped into two categories: 1) Bridge/underpass treatments; and 2) Landscape applications.

#### **Bridge/underpass treatments** – These include:

- New, wider walkways and enhanced lighting for safety and connectivity, as well as decorative up lighting and down lighting.

- Treatments to the underpass abutment walls and wider underpass openings.
- Specific placemaking opportunities built in for future public art on some of the monuments.
- Wall surface with a basic pattern as requested by local community.

Each underpass treatment is designed with consistent design vocabulary, even on the bridges not being replaced. All the design treatments work together to form a consistent design vocabulary. Ron showed a few slides with a prototypical treatment application.

**Landscape treatments** – The ADG includes an entire series of conceptual treatments that will be built into the landscape design for the North Split interchange. These include:

- Do Not Disturb areas
- Slope plantings
- Ground-level shrubs and trees that form a dense urban tree canopy, almost like an urban forest.

Ron showed slides illustrating the landscape treatments, noting how they will screen the neighborhoods from the interchange.

#### **Commerce Avenue/Roosevelt Avenue Underpass**

INDOT will not replace the I-70 bridge over Commerce Avenue/Roosevelt Avenue during the North Split project. However, INDOT received comments in April 2020 that the community desired enhanced features similar to the Alabama Street bridge treatment. INDOT adjusted its plan in May and June. The existing Commerce Avenue bridge will remain, but:

- Sidewalks will be replaced throughout the bridge area.
- Lighting fixtures will be replaced and upgraded.
- Side slope landscape plantings will be applied at the underpass.
- Funding will be provided for a mural on the existing columns, if desired by the local community.

Ron showed a rendering of the Commerce Avenue underpass with the new treatments applied.

#### **Pause for Questions**

Ron paused the presentation for questions. *(See Discussion and Questions at the end of these minutes.)*

### **7) Next Steps**

Seth Schickel reviewed the next steps for the North Split project:

- The public comment period for the EA is open now through August 17, 2020.
- The NEPA determination by FHWA concludes the environmental study process.
- Construction is anticipated to start in late 2020.
- Construction is anticipated to be completed in 2022.

An immediate next step is the Virtual Public Information Meeting later this week on July 30, 2020. The public hearing is next week on August 3, 2020. Kia thanked the CAC members for sharing the public hearing information; the Project Team appreciates the help in getting the word out.

## 8) Discussion and Questions

**Q: Regarding the Commerce Avenue letter sent to INDOT and the Mayor's office and INDOT's response, has this information been shared with the neighborhoods to address their concerns about Commerce Avenue?**

**A:** The North Split Project Team is sharing it now and will share at the upcoming virtual public information meeting and hearing. Today is the first time the information has been shared publicly.

**Q: Will the Project Team email neighborhood leaders and inform them?**

**A:** The Project Team has not done that. The Project Team had planned to share the information at the public information meeting and public hearing because of the large audience size; however, the Project Team can send emails that describe what INDOT is doing in that area.

**Q: What requirements are being instituted to protect residents from dust and from neighborhood streets becoming truck routes?**

**A:** INDOT can define where construction traffic can travel. For example, construction traffic will not be permitted on the brick portion 10<sup>th</sup> Street due to a new roadway surface. INDOT cannot restrict delivery trucks and other trucks, but the Project Team does not anticipate an increased number of trucks on local streets. INDOT can put more signage on approaching interstates and make adjustments for that.

Regarding dust, there are specific requirements for earth work on INDOT projects and the levels of dust allowed. There will be more than 40 inspectors on the North Split construction site to address this.

**Q: Are Commerce Avenue and Alabama Street bridges not receiving the same upgrades as the other bridges in the North Split project area?**

**A:** The Commerce Avenue/Roosevelt Avenue and Alabama Street bridges are different than other underpasses in the North Split project area because they are not being replaced. The Commerce Avenue/Roosevelt Avenue bridge underwent rehabilitation during the 2008 Super 70 project, along with the monster bridge that starts at Alabama Street. These bridge openings will not be widened, but INDOT is doing what it can with the bridges that are remaining in place. Commerce Avenue does not currently have a mural on its bridge columns, so INDOT is setting aside funding to do that if the community wants it. The Alabama Street bridge already has artwork on the columns.

**Q: What will be done to prevent damage to local roadways?**

**A:** There is a requirement in the Design-Build Team contract to create a video log of existing conditions under the interstates. If damage occurs, those roads will be repaired. Regarding damage to roads not in project area, INDOT is making some improvements now – those are the spot improvements mentioned earlier in the presentation.

**Q: What is the plan to ensure minority contractor participation in the North Split Project?**

**A:** There is a plan to ensure minority contractor participation. Because the project will receive federal funding, Disadvantaged Business Enterprise (DBE) goals will apply. The Project Team does not have an exact number for the DBE participation required for this project [note it was determined after the meeting the DBE goal for the project is 9% participation]. When contractors bid on the North Split Project, they are required to submit a DBE plan.

**Q: Are there certain certifications a minority-owned contractor must have to participate in the North Split Project?**

**A:** If a minority-owned contractor wants to be included on the design-build team, it must be certified as a DBE and submit a proposal to the Design-Build Team.

**Q: How is the Design-Build Team's DBE compliance monitored?**

**A:** DBE plan compliance is monitored based on the amount of money INDOT spends on the project. INDOT monitors exact percentages the contractor has committed to on a monthly basis by reviewing submitted invoices.

**Q: If a community member witnesses an infraction by a North Split contractor, will that count as an infraction? Are there any monetary fines levied?**

**A:** Generally, an INDOT project has a large manual with requirements and rules for how projects are built, and an inspection team inspects the work daily. The North Split Project Team does not have the specific procedures for infractions and reporting but will obtain that information.

**9) Adjourn**

Kia adjourned the meeting at 2:15 p.m.

**Attendees:**

<b>Community Advisory Committee Members</b>	
Rev. Tony Alexander	Purpose of Life Ministries
Lisa Bailey	CIRTA
Jennifer Boehm	IUPUI
Paula Brooks	Random Place Neighborhood
Anthony Burke, Sr.	Nora-Northside Community Council
Sarah Robinson Chin	Indianapolis Public Schools
Brad Coffing	MIBOR
Marsh Davis	Indiana Landmarks
Greg Ellis	Indiana Chamber of Commerce
Mark Godley	St. Joseph Neighborhood
Elizabeth Gore	Martindale-Brightwood Neighborhood
Rev. David Greene	Concerned Clergy of Indianapolis
Taylor Hughes	Indianapolis Chamber of Commerce
Joe Jarzen	Keep Indianapolis Beautiful
Danny Lopez	Bankers Life Fieldhouse
Russell Menyhart	Strong Indy

Meg Purnsley	Indianapolis Historic Preservation Commission
Jordan Ryan	North Square Neighborhood
James Wells	Mayor's Neighborhood Advocate (Area #8)
Beth White	Greater Indianapolis Progress Committee
<b>North Split Team Members</b>	
Michelle Allen	FHWA
Tomas Beauchamp	INDOT
Kia Gillette	HNTB
Amy Hanna	Borshoff
Laura Hilden	INDOT
Alexis Loyd	Borshoff
Scott Manning	INDOT
Tim Miller	HNTB
John Myers	HNTB
Erin Pipkin	Compass Outreach Solutions
Seth Schickel	HNTB
Runfa Shi	INDOT
Scott Siefker	TSW
Ron Taylor	TSW
Luke Waltz	TSW

**I-65/I-70 North Split Project Environmental Justice Working Group  
Invitation List - updated May 30, 2020**

<b>Organization</b>	<b>Contact Name</b>	<b>Title</b>	<b>Email</b>
<b>Government</b>			
City-County Council	Vop Osili	Council Member, District 11	<a href="mailto:voposili@gmail.com">voposili@gmail.com</a>
City-County Council	Zach Adamsom	Council Member, District 17	<a href="mailto:Zach@Adamsonforindy.com">Zach@Adamsonforindy.com</a>
Mayor's Neighborhood Advocate (Area #7)	Greg Garrett	Mayor's Advocate	<a href="mailto:gregory.garrett1@indy.gov">gregory.garrett1@indy.gov</a>
Mayor's Neighborhood Advocate (Area #8)	James Wells	Mayor's Advocate	<a href="mailto:james.wells2@indy.gov">james.wells2@indy.gov</a>
Indianapolis Office of Sustainability	Mo McReynolds	Community Engagement Manager	<a href="mailto:mo.mcreynolds@indy.gov">mo.mcreynolds@indy.gov</a>
Mayor's Neighborhood Advocate (Area #9)	Ike McCoy	Mayor's Advocate	<a href="mailto:isaac.mccoy@indy.gov">isaac.mccoy@indy.gov</a>
Mayor's Neighborhood Advocate (Area #10)	Fabio Yataco	Mayor's Advocate	<a href="mailto:fabio.yataco@indy.gov">fabio.yataco@indy.gov</a>
<b>Community and Advocacy Organizations</b>			
Marion County Alliance of Neighborhood Associations	Cathy Burton	President	<a href="mailto:burton@mcanaindy.org">burton@mcanaindy.org</a>
Health by Design	Kim Irwin	Executive Director	<a href="mailto:kirwin@hbdin.org">kirwin@hbdin.org</a>
United Way of Central Indiana	Sara VanSlambrook	Chief Impact Officer	<a href="mailto:sara.vanslambrook@uwci.org">sara.vanslambrook@uwci.org</a>
Local Initiatives Support Corporation of Indianapolis (LISC) Indianapolis	Tedd Grain	Deputy Director	<a href="mailto:tgrain@lisc.org">tgrain@lisc.org</a>
Greater Indianapolis NAACP	Denise-Adbul Rahman		<a href="mailto:darahman17@gmail.com">darahman17@gmail.com</a>
Black Expo	Alice Watson	VP of Operations and Project Management	<a href="mailto:awatson@indianablackexpo.com">awatson@indianablackexpo.com</a>

Indianapolis Urban League	Tony Mason	President and CEO	<a href="mailto:tmason@indplsul.org">tmason@indplsul.org</a>
Indianapolis Urban League	Mark Russell	Director of Advocacy & Family Services	<a href="mailto:mrussell">mrussell</a>
AARP Indiana	Mandla Moyo	Director of Community Engagement	<a href="mailto:MMoyo@aarp.org">MMoyo@aarp.org</a>
Indiana Association of Area Agencies on Aging	Kristen LaEace	CEO	<a href="mailto:klaeace@iaaaa.org">klaeace@iaaaa.org</a>
CICOA Aging and In-Home Solutions	Tauhric Brown	President and CEO	<a href="mailto:tbrown@cicoa.org">tbrown@cicoa.org</a>
Near Eastside Community Organization	Satchuel Cole	President	<a href="mailto:nescopresident@gmail.com">nescopresident@gmail.com</a>
John H. Boner Community Center	James Taylor	CEO	<a href="mailto:jtaylor@jbncenters.org">jtaylor@jbncenters.org</a>
	Melissa Benton	Community Development Officer	<a href="mailto:mbenton@jbncenters.org">mbenton@jbncenters.org</a>
Keep Indianapolis Beautiful	Ashley Haynes	Marketing Director	<a href="mailto:ahaynes@kibi.org">ahaynes@kibi.org</a>
Westminster Neighborhood Services	Chrissy Petersen	Executive Director	<a href="mailto:cpetersen@westmin.org">cpetersen@westmin.org</a>
Kheprw Institute	Imhotep Adisa		<a href="mailto:iadisa@kheprw.org">iadisa@kheprw.org</a>
<b>Transit</b>			
IndyGo	Bryan Luellen		<a href="mailto:bluellen@indygo.net">bluellen@indygo.net</a>
Central Indiana Regional Transportation Authority	DeAndre Rhodes	Mobility Manager	<a href="mailto:drhodes@cirta.us">drhodes@cirta.us</a>
<b>Limited English Proficiency (LEP) Organizations</b>			
The Indiana Latino Institute	Marlene Dotson	President and CEO	<a href="mailto:mdotson@indianalatinoinstitute.org">mdotson@indianalatinoinstitute.org</a>
Immigrants and Language Rights Center (Indiana Legal Services Inc.)	Jon Laramore	Executive Director	<a href="mailto:ILRC.Hotline@ilsi.net">ILRC.Hotline@ilsi.net</a>
La Plaza	Miriam Acevedo Davis	President and CEO	<a href="mailto:miriam@laplaza-indy.org">miriam@laplaza-indy.org</a>

Vedia Global	Felix Medina		<a href="mailto:felix@vediaglobalservices.com">felix@vediaglobalservices.com</a>
<b>Churches/Religious Institutions</b>			
Metropolitan Baptist Center	Rev. Tom Polak	Pastor/Director	<a href="mailto:mbc_952@yahoo.com">mbc_952@yahoo.com</a>
Catholic Charities - Indianapolis Office	David J. Bethuram	Executive Director	<a href="mailto:dbethuram@archindy.org">dbethuram@archindy.org</a>
Neighborhood Christian Legal Clinic	Christopher Purnell	Executive Director	<a href="mailto:contactus@nclegalclinic.org">contactus@nclegalclinic.org</a>
Indianapolis' Concerned Clergy/Purpose of Life Ministries	David Greene	President/Senior Pastor	<a href="mailto:dgreene@purposeoflifeministries.com">dgreene@purposeoflifeministries.com</a>
<b>Housing/Neighborhoods</b>			
Indianapolis Housing Agency	Rufus "Bud" Myers	Executive Director	<a href="mailto:bmyers@indyhousing.org">bmyers@indyhousing.org</a>
Indianapolis Neighborhood Housing Partnership	Moira Carlstedt	President and CEO	<a href="mailto:mcarls@inhp.org">mcarls@inhp.org</a>
Willard Park of Holy Cross-Westminster Civic Alliance	Christian Mosburg	President, Board of Directors	<a href="mailto:willardparkhcw@gmail.com">willardparkhcw@gmail.com</a>
King Park Development Corporation	Steven Meyer	Executive Director	<a href="mailto:smeyer@kingpark.org">smeyer@kingpark.org</a>
Windsor Park Neighborhood Association	Burns Gutzwiller	Resident	<a href="mailto:burnsgutzwiller@gmail.com">burnsgutzwiller@gmail.com</a>
Fletcher Place Neighborhood	Glenn Blackwood	Resident	<a href="mailto:glennblackwood@gmail.com">glennblackwood@gmail.com</a>
Ransom Place Neighborhood	Paula Brooks	Resident	<a href="mailto:haizlip@gmail.com">haizlip@gmail.com</a>
<b>Food Pantries/Shelters/Assistance Programs</b>			
Gleaners Food Bank of Indiana	Kathy Hahn Keiner	Chief Programs & Community Collaborations Officer	<a href="mailto:khahnkeiner@gleaners.org">khahnkeiner@gleaners.org</a>
Second Helpings	Jennifer Vigran	Chief Executive Officer	<a href="mailto:jennifer@secondhelpings.org">jennifer@secondhelpings.org</a>

Wheeler Mission	Richard "Rick" Alvis	President/CEO	<a href="mailto:rickalvis@wmm.org">rickalvis@wmm.org</a>
	Cal Nelson	Chief Program Officer	<a href="mailto:calnelson@wmm.org">calnelson@wmm.org</a>
Dayspring Center	Lori E. Casson	Executive Director	<a href="mailto:lori@dayspringindy.org">lori@dayspringindy.org</a>
Low Income Home Energy Assistance Program (Indiana Housing and Community Development Authority)	Jacob Sipe	Executive Director of IHEDA	<a href="mailto:jsipe@ihcda.in.gov">jsipe@ihcda.in.gov</a>
Horizon House	Teresa Wessel	Executive Director	<a href="mailto:teresaw@horizonhouse.cc">teresaw@horizonhouse.cc</a>
Community Action of Greater Indianapolis	Terrence White and Cynthia Taylor	Co-Executive Directors	
<b>Schools</b>			
The Oaks Academy	Andrew N. Hart	Chief Executive Officer	<a href="mailto:ahart@theoaksacademy.org">ahart@theoaksacademy.org</a>
Indianapolis Public Schools (IPS)	Kristian Stricklen	Public Information Officer	<a href="mailto:stricklenk@myips.org">stricklenk@myips.org</a>
<b>Hispanic Media</b>			
La Voz de Indiana	Liliana Hamnik Parodi	CEO, President & Founder	<a href="mailto:voz2@cs.com">voz2@cs.com</a>

**From:** [Kia Gillette](#)  
**To:** [ahart@theoaksacademy.org](#); [ahaynes@kibi.org](#); [awatson@indianablackexpo.com](#); [bluellen@indygo.net](#); [bmyers@indyhousing.org](#); [burnsgutzwiller@gmail.com](#); [burton@mcanaindy.org](#); [cainelson@wmm.org](#); [contactus@nclegalclinic.org](#); [cpetersen@westmin.org](#); [darahman17@gmail.com](#); [dbethuram@archindy.org](#); [dgreene@purposeoflifeministries.com](#); [drhodes@cirta.us](#); [fabio.yataco@indy.gov](#); [felix@veddiaglobalservices.com](#); [Glenn Blackwood](#); [Greg Garrett \(gregory.garrett1@indy.gov\)](#); [haizlip@gmail.com](#); [iadisa@kheprw.org](#); [ILRC.Hotline@ilsa.net](#); [Isaac McCoy \(isaac.mccoy@indy.gov\)](#); [james.wells2@indy.gov](#); [jennifer@secondhelpings.org](#); [jsipe@ihcda.in.gov](#); [jtaylor@jbncenters.org](#); [khahnkeiner@gleaners.org](#); [kirwin@hbdin.org](#); [klaeace@iaaaa.org](#); [lori@dayspringindy.org](#); [Mark Russell](#); [mbc\\_952@yahoo.com](#); [mbenton@jbncenters.org](#); [mcarls@inhp.org](#); [mdotson@indianalatinoinstitute.org](#); [miriam@laplaza-indy.org](#); [MMoyo@aarp.org](#); [mo.mcreynolds@indy.gov](#); [nescopresident@gmail.com](#); [rickalvis@wmm.org](#); [Sara VanSlambrook \(sara.vanslambrook@uwci.org\)](#); [smeyer@kingpark.org](#); [stricklenk@myjps.org](#); [Taurhic Brown \(tbrown@cicoa.org\)](#); [Tedd Grain \(tgrain@lisc.org\)](#); [teresaw@horizonhouse.cc](#); [tmason@indplsul.com](#); [voposili@gmail.com](#); [voz2@cs.com](#); [willardparkhew@gmail.com](#); [Zach@Adamsonforindy.com](#)  
**Cc:** [Runfa Shi \(rshi@indot.IN.gov\)](#); [bshattuck@indot.IN.gov](#); [Laura Hilden \(lhilden@indot.IN.gov\)](#); "Miller, Brandon"; [Ronald Bales \(rbales@indot.IN.gov\)](#); [John W. Myers](#); [Michelle Allen \(michelle.allen@dot.gov\)](#); [Andrew Dietrick \(adietrick@indot.in.gov\)](#); [Scott Manning \(smanning1@indot.in.gov\)](#); [Seth Schickel \(sschickel@HNTB.com\)](#)  
**Subject:** North Split EJ Working Group Meeting, Virtual Public Information meeting, and Public Hearing  
**Date:** Wednesday, July 15, 2020 12:47:00 PM  
**Attachments:** [North Split Public Hearing Flier.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Dear North Split Environmental Justice (EJ) Working Group Members,

The Environmental Assessment (EA) for the I-65/I-70 North Split Interchange Reconstruction will be available for public review and comment beginning Friday, July 17, 2020. INDOT is hosting two sessions – one virtual public information meeting and one in-person public hearing – to present the EA. We wanted to provide you with some information and updates:

- EJ Working Group Meeting:** We would like to provide a preview of the virtual public information meeting/public hearing presentation at a virtual Environmental Justice Working Group Meeting on **Tuesday July 28, 2020**, from **1 to 3 p.m.** The EJ Working Group meeting will be conducted online via the WebEx online meeting tool. When the Outlook calendar invitation for the meeting is sent, it will include the WebEx information and a meeting agenda. To join the meeting, click the “Join Meeting” button in your Outlook calendar invitation – either on a computer or on your smartphone. If you plan to join the meeting via audio only, please let us know, and we will make the PowerPoint presentation available to you for download in advance of the meeting.
- Virtual Public Information Meeting:** A virtual public information meeting will be conducted on **Thursday, July 30, 2020, at 5 p.m.** Eastern time. The presentation will be conducted via WebEx and will be identical to the in-person public hearing presentation. A link to access the online presentation and instructions will be made available at [www.northsplit.com/ea-sessions](http://www.northsplit.com/ea-sessions). The virtual public information meeting will also be broadcast on Indianapolis Government Access Channel 16.
- Public Hearing:** The general public is invited to participate in an in-person Public Hearing on **Monday, August 3, 2020** at Ivy Tech Culinary & Conference Center, 2820 North Meridian Street, Indianapolis 46208. Social distancing and face covering requirements will be followed, per the July 9 Marion County mandate. Doors will open at 4 p.m. Eastern Time, and there will be formal presentations at 4:30 p.m. and 6 p.m. Verbal statements will be accepted during a public comment session immediately following the formal presentations. Comments may also be submitted prior to the public hearing and within the comment period – July 17, 2020, through August 17, 2020 – in the following ways:
  - The North Split website comment form: <https://northsplit.com/contact-us/>
  - Email to [info@northsplit.com](mailto:info@northsplit.com)
  - Mail to the North Split PO Box at P.O. Box 44141, Indianapolis, IN 46244

- A toll-free telephone line with voice mailbox at 1-877-799-6570

Attached is a flier with more information about the virtual public information meeting and the Public Hearing. **Please help us communicate information about the virtual public information meeting and the Public Hearing to your colleagues, neighbors, and friends by forwarding this information and the attached flier.**

Please let me know if you have any questions.

Thank you,  
Kia

**Kia Gillette**

Environmental Project Manager

Tel (317) 917-5240 Cell (317) 695-0825 Email [kgillette@hntb.com](mailto:kgillette@hntb.com)

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## MEETING AGENDA

**Date:** July 28, 2020

**Time:** 1 to 3 p.m.

**Meeting:** North Split EJ Working Group Meeting #5

**Location:** Meeting conducted online via WebEx

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1. Welcome & Introductions
2. Environmental Justice Working Group Meeting Format
3. Public Hearing Format
4. EA Availability/Formal Comment Opportunities
5. Purpose and Need
6. Alternatives/Preferred Alternative
7. Environmental Impacts
  - a. Historic Properties
  - b. Highway Noise
  - c. Environmental Justice (EJ)
  - d. Traffic Impacts
8. Context Sensitive Solutions (CSS)
9. Next Steps
10. Discussion and Questions
11. Adjourn



## MEETING SUMMARY

**Date:** July 28, 2020  
**Time:** 1 to 3 p.m.  
**Meeting:** North Split Environmental Justice Working Group Meeting #5  
**Location:** Meeting conducted online via WebEx

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*\*Complete attendee list begins on page 10.*

### 1) Welcome and Introductions

Kia Gillette from HNTB welcomed Environmental Justice (EJ) Working Group members, introduced herself and everyone on the WebEx call. She reviewed the meeting agenda with attendees.

The EJ Working Group meeting will give attendees the opportunity to see the same presentation that will be shown at the virtual public information meeting and in-person public hearing. This presentation may have a few extra introductory slides, but the content is the same.

The virtual public information meeting and public hearing will be conducted:

- Virtual public information meeting: July 30 from 5 to 7 p.m. It will also be broadcast on Channel 16.
- In-person public hearing: August 3 from 4 to 7 p.m. at Ivy Tech Culinary and Conference Center.

Pauses have been built into this presentation to give attendees the opportunity to ask questions via the WebEx chat feature or verbally.

The presentation is a summary of the North Split project, so EJ Working Group members who have attended previous meetings will see familiar information. There is new information about the Commerce Avenue/Roosevelt Avenue overpass that will be discussed in the aesthetics section of the presentation.

Kia reviewed the public hearing format:

- The in-person public hearing format will include a presentation by three Project Team speakers, Kia Gillette, the Environmental Lead for HNTB; Seth Schickel the Project Manager for HNTB; and Ron Taylor from TSW Design Group, the Urban Design Lead.
- Formal verbal comments will be taken for the project record immediately following the presentation. To allow time for formal public comments, there will not be a Question and Answer period after the presentation.
- The Project Team will be available before and after the presentation with the display boards to answer questions.

## 2) EA Availability/Opportunities to Make Formal Comments

The Environmental Assessment, also known as the EA, is available via the North Split Project website ([northsplit.com/ea](http://northsplit.com/ea)), and hard copies are available at the HNTB office downtown and several downtown libraries:

- Central Library
- Spades Park Branch Library
- Garfield Park Branch Library
- Martindale-Brightwood Branch Library

The EA document contains three large binders of information for the public's review. The public hearing presentation and exhibit boards are available on the project website for review at ([northsplit.com/ea-sessions](http://northsplit.com/ea-sessions)).

The North Split Project Team has also launched a virtual project office on the project website to give the public another opportunity to review the information. The virtual project office includes much of the same information as the website but is organized a little differently. It includes a link to this presentation, with audio.

The public has several opportunities to make formal EA comments. One method is not better than any of the others, they are all treated equally.

- Verbally at the public hearing and transcribed by a court reporter
- Verbally via a toll-free telephone number with voice mail recording
- In writing on comment cards at the public hearing
- In writing submitted via the North Split email – [info@northsplit.com](mailto:info@northsplit.com)
- In writing via the Project website at [northsplit.com/contact-us](http://northsplit.com/contact-us)
- In writing and mailed to P.O. Box 44141, Indianapolis, IN 46244

The formal comment period for the EA ends August 17, 2020. Kia asked all EJ Working Group members to please submit any comments by that date.

Kia provided an overview of the North Split Project:

- The North Split is where I-65 and I-70 meet at the northeast corner of the downtown Indianapolis inner loop.
- It is the busiest interchange in the region and the second-busiest in Indiana, with more than 214,000 vehicles traveling it per day.
- The North Split was constructed in the 1960s and 1970s, and the pavement and bridges need to be replaced due to wear and tear.
- The interchange has safety concerns, with more than 1,600 crashes between 2012 and 2016.
- The interchange was originally designed to have a fourth leg going to the northeast side of Indianapolis. That leg will never be constructed.

## 3) Purpose and Need

Kia reviewed the Purpose and Need for the North Split Project. One of reasons the project is needed is because of the poor condition of the interchange, which has deteriorating bridges and pavement. The infrastructure is past its useful life.

- Most North Split components are more than 50 years old.
- Thirty-two bridges need rehabilitation or replacement due to their poor structural condition.

- Existing pavement requires constant repair and patching due to its condition and age, which is not cost effective.
- There were 1,600 crashes between 2012 and 2016 on the North Split. The crash rates are higher than expected from other interstates. Most of the crashes were rear-end crashes due to congestion and stopped traffic. The second most frequently occurring crashes were sideswipe crashes due to congestion and weaving movements.
- The interchange has merges, weaving, and lane changes occurring over short distances. This creates numerous crashes, driver confusion, and poor traffic flow.

Weaves occur where traffic must cross other lanes of traffic to get to their destination. At the Pennsylvania Street exit ramp, northbound I-65 traffic has to cross traffic from I-70 over a short distance to access the Pennsylvania Street ramp. At the Delaware Street entrance ramp, traffic going to I-70 eastbound must cross I-65 southbound traffic and traffic traveling to the collector-distributor road.

The Purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities within the North Split project area. The Project is needed to:

- Correct deteriorated bridge conditions
- Correct deteriorated pavement conditions
- Improve safety
- Improve interchange operations and reduce congestion

#### Pause for Questions

Kia paused the presentation for questions. There were no questions.

#### **4) Alternatives/Preferred Alternative**

Seth Schickel from HNTB reviewed the interchange design alternatives the North Split Project Team evaluated in the process of developing the EA. The Project Team developed a screening report in fall of 2018 that included alternatives ranging from doing nothing (No Build) to expanding the interchange and adding through lanes.

- Alternative 1 (No Build), Alternative 2 (Transportation System Management), and Alternative 3 (Bridge and Pavement Replacement In-Kind) – were eliminated during the first stage of evaluation. None of these alternatives addressed the safety and congestion problems. Therefore, they did not meet the Purpose and Need.
- Alternative 5 would meet the Purpose and Need, but it was eliminated because the impact of the widening of the interstates within the project area was deemed unacceptable.
- Alternative 4 would improve the existing interchange conditions without adding new through lanes. Alternatives 4a, 4b, and 4c varied in how the weaves are eliminated.
  - Alternative 4a would close the ramps at Pennsylvania Street and Delaware Street entirely to meet the Purpose and Need. This would have the least physical impact because the footprint of the interstate would be the same as the existing interchange. However, this alternative would have the greatest traffic impacts because all access at the two streets would be lost.
  - Alternative 4b would provide all movements at Pennsylvania Street and Delaware Street while eliminating the weaves. It would provide good traffic service but would require widening the interstate footprint on both sides, with tall retaining walls to stay within the existing right-of-way.

- Alternative 4c represents a compromise solution. It would provide most of the movements at Pennsylvania Street and Delaware Street that exist today. There would be minimal widening of the interstate footprint and it would have only moderate retaining walls.

After conducting public meetings and soliciting community input, the North Split Project Team determined that Alternative 4c would provide the best balance of traffic services with the least impact to the project area. It was identified as the Preferred Alternative because it:

- Meets the Project's Purpose and Need
  - New pavement and bridges
  - Corrects the worst safety problems
  - Removes the worst bottlenecks
- Avoids major environmental Impacts
  - Smaller, more compact footprint
  - Minimal widening with shorter retaining walls
  - Within the existing right-of-way

The compromise for Alternative 4c is that there will be no access to Pennsylvania Street from I-70. Traffic models show this traffic would primarily divert to the Michigan Street or Ohio Street ramps, with a minimal diversion to West Street.

The Delaware Street entrance ramp will continue to access I-70 eastbound but will no longer access I-65 southbound or the collector-distributor road leading to the Michigan Street, Ohio Street, and Fletcher Avenue ramps. Traffic counts show relatively small volumes of traffic travel to these exits from the Delaware Street entrance ramp.

#### Pause for Questions

Seth paused the presentation for questions. There were no questions.

### **5) Environmental Impacts**

Kia said the EA document, which is in the middle of a public comment period, is a requirement of the National Environmental Policy Act (NEPA). The EA analyzes impacts to both the human and natural environments. Following the public comment period for the EA, the Federal Highway Administration (FHWA) will make one of two determinations:

- Finding of No Significant Impact (FONSI), and the NEPA process will end; or
- Significant environmental impacts, which will require the preparation of an Environmental Impact Statement (EIS).

Kia reviewed some of the key focus areas in the EA document but encouraged attendees to view the entire EA if they want to more detail. Focus areas include:

- Historic properties (Section 106)
- Highway noise
- Environmental Justice
- Traffic impacts of construction

#### **Historic Properties Impacts**

Section 106 of the National Historic Preservation Act of 1966 protects historic districts and individually listed properties.

As part of the Section 106 consultation process, adverse effects were identified for four historic districts and/or properties:

- Old Northside Historic District/Morris Butler House
- St. Joseph Neighborhood Historic District
- Chatham-Arch Historic District

Mitigation commitments are identified as part of the Section 106 process to compensate for the diminishment of historic properties and are documented in a Memorandum of Agreement (MOA). The MOA includes mitigation commitments for adverse effects to historic properties, not all project commitments. Other environmental commitments are included in the EA document, starting on page 68.

### **Highway Noise**

The EA document also includes highway noise impacts. Five potential noise barriers were identified according to INDOT's Traffic Noise Policy. The two noise barriers east of the North Split interchange and north along I-70 were recommended based on benefited receptor surveys and other factors. In addition to noise barriers, INDOT is using noise-reducing technologies throughout the project area. Those technologies include jointless paving and bridges, and next-generation pavement grooving.

### **Environmental Justice (EJ)**

Kia noted the North Split Project Team consulted with the Environmental Justice (EJ) Working Group in evaluating this topic, and the results are summarized in the EA document. EJ includes:

- Fair treatment and meaningful involvement of all people regardless of race or income.
- Identifying and addressing disproportionately high and adverse effects on minority or low-income populations.
- Equitable distribution of benefits and burdens of the project.

The EA analysis included:

- Identifying potential EJ populations using Census data.
- Organizing and consulting with the EJ Working Group. Kia noted that the Project Team appreciated the EJ Working Group's assistance throughout the project.
- Conducting the EJ public survey, which was open to everyone. The survey was heavily promoted via:
  - Email
  - Text
  - Social media
  - North Split Advisory Committees
  - IndyGo Transit Center
  - IndyGo bus ads

More than 1,600 surveys were completed, with similar EJ community and non-EJ community responses. No disproportionate impacts on minority or low-income populations were identified.

Kia noted that the EJ Impacts slide was a one-slide summary but encouraged participants to reference the EJ Technical Memorandum that is an appendix of the EA document to learn more.

### **Traffic Impacts**

Seth reviewed the traffic impacts of the North Split Project. He said long-term traffic impacts of the project will be minimal because additional through lanes are not being added to the interchange. The major traffic impacts will occur during construction.

A detailed Maintenance of Traffic Plan is in development by the North Split Design-Build Team, per INDOT criteria. INDOT sets the overall closure plan and requirement notifications, so the extent of roadway closures is already known, and INDOT is implementing a Mobility Management Plan (MMP) to reduce traffic impacts during construction.

Seth reviewed the changes in downtown access during construction.

- The primary closure will be the main line of I-65 and I-70 between Washington Street and the North Split. This will be closed for about two years, and through traffic normally traveling this area will be detoured around I-465.
- Rather than closing all movements, INDOT recognized the need for access to specific traffic movements during construction and requires some segments to remain open:
  - The east-west link between I-65 and I-70 will remain open throughout project construction, with two lanes open in each direction. The ability to leave these movements open is created by the project's more compact footprint.
  - Exit and entrance ramps on the north side of downtown will remain open, except for a 90-day period needed to reconstruct the Pennsylvania Street and Delaware Street ramps.
  - The entrance ramp to I-70 east from Pine Street will remain open throughout construction.
  - The westbound I-70 ramp to the collector-distributor road leading to Michigan Street and Ohio Street will be open throughout to provide access to downtown. However, the collector-distributor will be closed south of the Ohio Street ramp, including the Fletcher Avenue exit, to prevent use by through traffic.
  - Either the Michigan Street exit or the Ohio Street exit will remain open at all times. INDOT has required that both cannot be closed at the same time; however, one or the other will be closed for up to a year at a time.

Seth reviewed downtown bridge closures:

- All I-65/I-70 bridges over local streets in the North Split project area will be replaced, except Alabama Street and Commerce Avenue/Roosevelt Avenue.
- These bridges will be closed for up to 90 days for reconstruction. Adjacent bridges will not be closed at the same time to reduce traffic impacts.
- The Washington Street bridge will be treated differently. It will be open throughout construction with lane closures only. Because of the width of the Washington Street bridge under the highway, construction can occur in stages and allow lanes to stay open during construction. The number of lanes will be reduced, but it will not be fully closed.

INDOT is administering a Mobility Management Plan (MMP) to reduce local traffic impacts. The MMP will be in place before construction begins and will be used throughout construction. The goals of the MMP are to:

- Optimize traffic operations on the available transportation network.

- Reduce overall roadway network demand.
- Provide enhanced motorist information.

The MMP has three main activity areas:

- Maintenance of Traffic/construction, which is the Design-Built Team's responsibility.
- Traffic Operations Management and a subgroup, Emergency Response, which will ensure emergency responder access throughout construction.
- Travel Demand Management (TDM).
- Real-Time Traveler Information Systems.

Traffic Operations Management for the North Split involves INDOT partnering with the City of Indianapolis to improve local traffic operations before North Split construction begins.

Seth reviewed the activities included in Traffic Operations Management:

- Traffic monitoring: INDOT is working with the City of Indianapolis to upgrade traffic signals and monitoring throughout downtown Indianapolis. Most of this work will be done in 2020, with more than 400 signals being improved as part of the preparation for construction.
- Interchange improvements: The West Street/Dr. Martin Luther King, Jr. Street exit and the Washington Street entrance and exit ramps will be improved to help with traffic flow during construction. These improvements will be completed in 2020.
- Spot improvements: These improvements are underway to improve efficiency on streets that serve downtown and will be completed in 2020.
- Motorist information: This includes wayfinding notifications and real-time traffic information.
- Incident management: INDOT will be working with Emergency Medical Services to establish an incident management plan to enable efficient response times in and around the construction zone for emergency responders.

Travel Demand Management for the North Split involves reducing peak period travel into and out of downtown by implementing the following:

- Mode choice: Encouraging different modes of travel, including transit, carpool/vanpool, and biking/walking.
- Trip reduction/reschedule: Encouraging use of staggered work hours, flex time, and working from home during heavily congested traffic periods.
- Public/employer TDM education program: Creating an education program for employers to inform and encourage alternate work arrangements.

INDOT will also be providing real-time traveler information, such as frequent bulletins, extensive communications, and technologies that deliver current information allowing travelers to decide how, when, and where to travel, or whether to travel at all. Information will be provided via:

- Social media
- Public broadcast and print media
- Changeable message freeway signs

Traffic apps such as Waze and Google Travel are another way INDOT will communicate real-time travel information to the public. INDOT will coordinate with these apps to provide information about specific closures and on the project.

### Pause for Questions

Seth paused the presentation for questions. *(See Discussion and Questions at the end of these minutes.)*

## 6) **Context Sensitive Solutions (CSS)**

Ron Taylor from TSW Design Group provided an overview of the Aesthetic Design Guidelines (ADG) process and results for the North Split Project. The purpose of the ADG is to provide the Design-Build Team and their landscape architects an aesthetic direction for the project design.

The ADG are the result of an extensive public engagement process over the last 12 months, including meetings with:

- Local neighborhoods and neighborhood organizations
- Local agencies and oversight departments
- Key local resource groups
- Local business organizations
- Local stakeholders and stakeholder groups

The CSS Process included visioning with the community, development of preliminary design treatments, public review of the design treatments, creation of a CSS Design Guidelines package that was reviewed with the community, and development of specifications and standards. The process was conducted with public engagement, including:

- 12 neighborhood workshops with 15 different neighborhoods
- 2 local business group meetings
- 4 meetings with the Rethink Coalition
- Engaging with more than 400 residents
- Receiving more than 6,000 comments

Most of the visual elements for the North Split Project are grouped into two categories: 1) Bridge/underpass treatments; and 2) Landscape applications.

### **Bridge/underpass treatments** – These include:

- New, wider walkways and enhanced lighting for safety and connectivity, as well as decorative up lighting and down lighting.
- Treatments to the underpass abutment walls and wider underpass openings.
- Specific placemaking opportunities built in for future public art on some of the monuments, in case neighborhoods choose to do this.
- Wall surface with a basic pattern as requested by local community.

Each bridge and underpass treatment is designed with the same design vocabulary, even on the bridges not being replaced. All the design treatments work together to form a consistent design vocabulary. Ron showed slides with prototypical treatment applications.

**Landscape treatments** – Landscaping is the second area with the most noticeable aesthetic treatments throughout the interchange. The ADG includes an entire series of conceptual treatments that will be built into the landscape design for the North Split. These include:

- Do Not Disturb areas
- Slope plantings
- Ground-level shrubs and trees that form a denser urban tree canopy, almost like an urban forest. This was created after numerous meetings with local representatives.

Ron used slides to illustrate the landscape treatments, noting how they will create a significant visual buffer shielding the neighborhoods from the interchange.

#### **Commerce Avenue/Roosevelt Avenue Underpass**

INDOT will not replace the I-70 bridge over Commerce Avenue/Roosevelt Avenue during the North Split project. However, INDOT received comments in April 2020 requesting enhanced features that are similar to the Alabama Street bridge treatment. INDOT adjusted its plan in May and June to respond to those comments. The existing Commerce Avenue bridge will remain in place, but several aesthetic treatments will be applied, including:

- Sidewalks will be replaced throughout the bridge area.
- Lighting fixtures will be replaced and upgraded to match pedestrian-level lighting on the other underpasses.
- Side slope landscape plantings will be applied at the underpass.
- Funding will be provided for a mural on the existing columns underneath the bridge, if desired by the local community.

Ron showed a rendering of the Commerce Avenue underpass with the new treatments applied.

#### **Pause for Questions**

Ron paused the presentation for questions. *(See Discussion and Questions at the end of these minutes.)*

### **7) Next Steps**

Seth reviewed the next steps for the North Split Project:

- The public comment period for the EA is open now through August 17, 2020. This meeting, the Community Advisory Committee (CAC) meeting, and the in-person public hearing are occurring in the middle of the comment period.
- The NEPA determination by the FHWA will conclude the environmental study process, either with a Finding of No Significant Impact (FONSI) or a requirement for an Environmental Impact Statement.
- Construction is anticipated to start in late 2020.
- Construction is anticipated to be completed in 2022, although some incidental work may extend into 2023.

An immediate next step is the Virtual Public Information Meeting later this week (July 30, 2020). Next week (August 3, 2020) is the public hearing.

#### **Pause for Questions**

Seth paused for questions and comments. There were none.

Kia reminded EJ Working Group members of the upcoming virtual public information meeting, which can be accessed through a link on the [northsplit.com](http://northsplit.com) website. The in-person public hearing will be next Monday, August 3. Doors open at 4 p.m., with presentations at 4:30 and 6 p.m. She encouraged EJ Working Group members to submit any comments by August 17.

### **8) Discussion and Questions**

**Q: The sidewalks look tiny in the Commerce Avenue renderings.**

**A:** The sidewalks being replaced are based on the existing sidewalks, and the width is established by the columns of the bridge.

**Q: Is INDOT working with the Indianapolis Department of Public Works to coordinate traffic signals?**

**A:** Yes. The new equipment being installed will improve signal coordination throughout downtown.

**Q: What is the timeline for the employer education campaign?**

**A:** The goal is to have employer education materials developed in summer 2020 and implemented in the fall and winter of 2020.

**Q: Describe what we are looking at? (Referencing the slide on p. 45 of the presentation)**

**A:** This rendering is from a position of above 16<sup>th</sup> Street looking under the Commerce Avenue bridge.

**9) Adjourn**

Kia adjourned the meeting at 2:03 p.m.

**Attendees:**

<b>EJ Working Group Members</b>	
Jen Higginbotham	Indianapolis MPO
Vincent Hill	Health by Design
Logan Lane	Health by Design
Mandla Moyo	AARP Indiana
DeAndre Rhodes	CIRTA
Fabio Yataco	Mayor's Neighborhood Advocate (Area #10)

<b>North Split Team Members</b>	
Michelle Allen	FHWA
Ron Bales	INDOT
Kia Gillette	HNTB
Joe Guerre	HNTB
Amy Hanna	Borshoff
Laura Hilden	INDOT
Alexis Loyd	Borshoff

Scott Manning	INDOT
Brandon Miller	INDOT
John Myers	HNTB
Erin Pipkin	Compass Outreach Solutions
Seth Schickel	HNTB
Runfa Shi	INDOT
Scott Siefker	TSW
Ron Taylor	TSW
Luke Waltz	TSW



# North Split Environmental Assessment Public Hearing Attendee Sign-In Sheet

August 3, 2020; 4 – 7 p.m.

NAME	EMAIL ADDRESS (for project updates via e-newsletter)
Elizabeth Biggio	<a href="mailto:Etbiggio@gmail.com">Etbiggio@gmail.com</a>
Jacob Bower-Bir	
Nathan Bower-Bir	
Anthony Burke	<a href="mailto:aburkesr@yahoo.com">aburkesr@yahoo.com</a>
Simon Davies	
Judith Essex	
Morgan Mickelson	<a href="mailto:Morganleigh.mickelson@gmail.com">Morganleigh.mickelson@gmail.com</a>
Bryce Mosey	<a href="mailto:Bryce.thom@att.net">Bryce.thom@att.net</a>
Gregory Porter	<a href="mailto:gporter@hhcorp.org">gporter@hhcorp.org</a>
Kevin Senninger	
Gregg Trefinger	
David Voyd	<a href="mailto:Dvoyd2025@icloud.com">Dvoyd2025@icloud.com</a>
Brian Wolf	<a href="mailto:Brianwolf1@gmail.com">Brianwolf1@gmail.com</a>
Micah Yason	<a href="mailto:myason@wfyi.org">myason@wfyi.org</a>



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### Environmental Assessment Availability

- Environmental Assessment (EA) available at:
  - [northsplit.com/ea](http://northsplit.com/ea)
  - HNTB Office – 111 Monument Circle, Suite 1200, Indianapolis, IN 46204
  - Central Library – 40 E. Saint Clair Street, Indianapolis, IN 46204
  - Spades Park Branch Library – 1801 Nowland Avenue, Indianapolis, IN 46201
  - Garfield Park Branch Library – 2502 Shelby Street, Indianapolis, IN 46203
  - Martindale-Brightwood Branch Library – 2434 N. Sherman Drive, Indianapolis, IN 46218
- Presentation and exhibits available at:
  - [northsplit.com/ea-sessions](http://northsplit.com/ea-sessions)



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### Public Hearing Format

- Presentation with three speakers
  - Kia Gillette with HNTB, Environmental Lead
  - Seth Schickel with HNTB, Project Manager
  - Ron Taylor with TSW Design Group, Urban Design Lead
- Formal verbal comments for the project record immediately following the presentation
- To allow time for all public comments, there will not be a question and answer session during or after the presentation.
- The project team will not answer questions posed in the formal comments



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### Opportunities to Make Formal Comments

- Verbally at the public hearing (transcribed by court recorder)
- Verbally via toll free telephone recording at 1-877-799-6570 (toll free)
- Completed comment form or correspondence at the hearing or via:
  - Email: [info@northsplit.com](mailto:info@northsplit.com)
  - Website: [northsplit.com/contact-us/](http://northsplit.com/contact-us/)
  - U.S. Mail: P.O. Box 44141, Indianapolis, IN 46244
- Formal Comment Period ends on Aug. 17, 2020




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### Agenda

- EA Availability / Opportunities to make Formal Comments
- Purpose and Need
- Alternatives / Preferred Alternative
- Environmental Impacts
  - Historic Properties
  - Highway Noise
  - Environmental Justice (EJ)
  - Traffic Impacts
- Context Sensitive Solutions (CSS)
- Next Steps
- Formal Public Comments




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### North Split Project

- Where I-65 and I-70 meet at northeast corner of downtown Indianapolis inner loop
- Busiest interchange in region, second-busiest in Indiana
  - 214,000 vehicles per day
- Constructed in 1960s and 1970s – pavement and bridges need replaced
- Safety concerns – over 1,600 crashes from 2012 to 2016
- Originally designed for a 4<sup>th</sup> interstate leg to the northeast




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### Need for the Project: Poor Condition

- Most North Split components are more than 50 years old
- 32 bridges need rehabilitation or replacement due to poor structural condition
  - 11 bridges only have 2-5 years of remaining service life
- Existing pavement requires constant repair and patching due to condition and age



**NORTH SPLIT**  
UPGRADES  
DRIVING PROGRESS

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### Purpose and Need

**PURPOSE** – The purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities within the North Split project area.



**NEED** – The project is needed in order to:

- Correct deteriorated bridge conditions
- Correct deteriorated pavement conditions
- Improve safety
- Improve interchange operations and reduce congestion

**NORTH SPLIT**  
UPGRADES  
DRIVING PROGRESS

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### Need for the Project: Safety

- 1,600 crashes from 2012 to 2016
  - #1: Rear-end crashes – due to congestion and stopped traffic
  - #2: Sideswipes crashes – due to congestion and weaving movements
- Merges, weaves, and lane changes over short distances cause:
  - Numerous crashes
  - Driver confusion
  - Poor traffic flow



**NORTH SPLIT**  
UPGRADES  
DRIVING PROGRESS

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### Alternatives Evaluation

*Alternatives eliminated - do not meet purpose and need*

- No Build
- Transportation System Management (TSM)
- Bridge and Pavement Replacement In-Kind

*Alternative eliminated – causes unacceptable impacts*

- All Ramp Connections and Added Travel Lanes

*Alternatives balancing purpose, need, and impact*

- Ramps closed at Pennsylvania and Delaware
- Full access at Pennsylvania and Delaware
- Selected ramp restrictions at Pennsylvania and Delaware



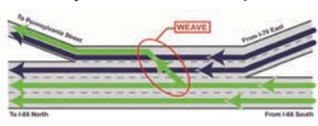
**NORTH SPLIT**  
UPGRADES  
DRIVING PROGRESS

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### Need for the Project: Roadway Congestion

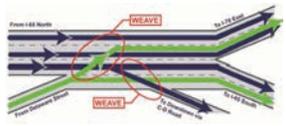
- Weaving areas on west leg of interchange cause most congestion
- Weaving areas also result in highest crash rate in project area

**Pennsylvania Street Exit Ramp**



Most frequent crash type:  
• Rear-end, followed by sideswipe

**Delaware Street Entrance Ramp**



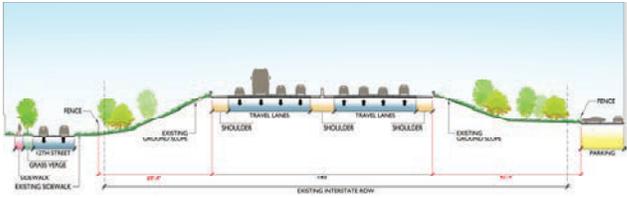
Most frequent crash type:  
• Sideswipe, followed by rear-end

**NORTH SPLIT**  
UPGRADES  
DRIVING PROGRESS

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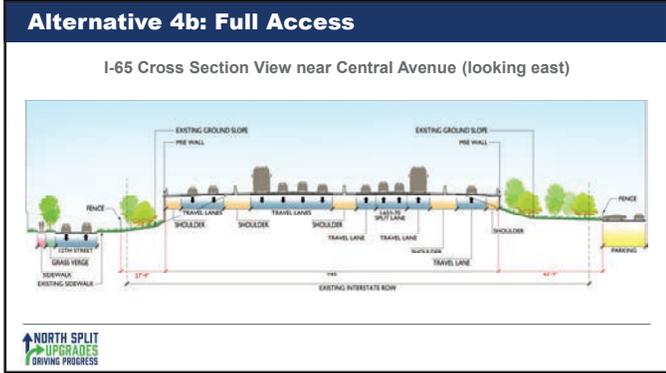
### Alternative 4a: Ramps Closed

I-65 Cross Section View near Central Avenue (looking east)



**NORTH SPLIT**  
UPGRADES  
DRIVING PROGRESS

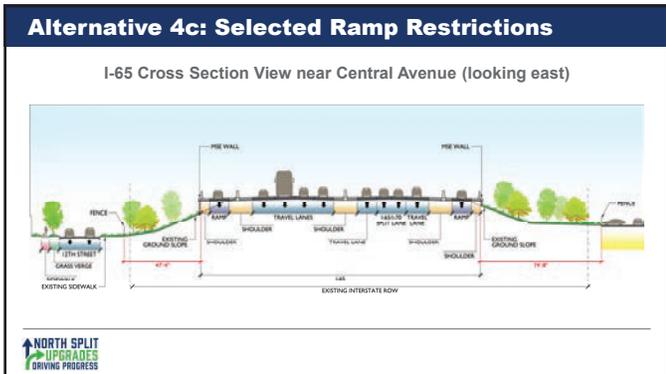
12



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### Environmental Assessment (EA)

- National Environmental Policy Act (NEPA) requirement
- Analyzes impacts to both human and natural environment
- Following the public comment period for the EA, FHWA will make a determination of:
  - Finding of no significant impact (FONSI), or
  - Significant impacts require preparation of an Environmental Impact Statement (EIS)
- Key North Split focus areas:
  - Historic Properties (Section 106)
  - Highway Noise
  - Environmental Justice
  - Traffic Impacts of Construction

**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Preferred Alternative – Alternative 4c

**Meets Purpose and Need**

- New pavement and bridges
- Corrects the worst safety problems
- Removes the worst bottlenecks

**Avoids Major Impacts**

- Smaller, more compact footprint
- Minimal widening with shorter walls
- Within existing right-of-way

**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Historic Properties Impacts

- Section 106 of the National Historic Preservation Act of 1966 protects historic districts and properties
- Adverse effect identified for 4 historic districts/properties:
  - Old Northside Historic District/Morris Butler House
  - St. Joseph Neighborhood Historic District
  - Chatham-Arch Historic District
- Mitigation commitments identified to compensate for the diminishment of historic properties and documented in a Memorandum of Agreement (MOA)

**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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## Highway Noise Impacts

- Five potential noise barriers were identified according to INDOT's Traffic Noise Policy
- Two noise barriers recommended based on benefited receptor surveys and other factors
- Both recommended noise barriers are on the north side of I-70, east of the North Split
- Noise reducing technologies throughout the project – jointless pavement, jointless bridges, and “next generation” grooving



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## Traffic Impacts

- Most North Split traffic impacts will occur during construction
- Permanent long-term traffic changes minimal due to no added through lanes
- Maintenance of Traffic (MOT) plan developed by design-build contractor per INDOT criteria
- INDOT criteria establish allowable closure durations and required notifications
- Mobility Management Plan administered by INDOT to reduce traffic impacts



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## Environmental Justice Impacts

- Environmental Justice is:
  - Fair treatment and meaningful involvement of all people regardless of race or income
  - Identifying and addressing disproportionately high and adverse effects on minority or low-income populations
  - Equitable distribution of benefits and burdens of the project



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## Traffic Impacts

- I-65/I-70 through traffic closed between the North Split and Washington Street
- Through traffic detour to I-465
- East-west link between I-65 and I-70 to remain open

Closure Period:

- I-65 – two construction years
- I-70 – two construction years



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## Environmental Justice Impacts

- Identify potential EJ populations using Census data
- Organize and consult with EJ Working Group
- Conduct EJ public survey
  - Advertised via Email, Text, Social Media, Advisory Committees, IndyGo Transit Center, and Bus Ads
  - Over 1,600 surveys completed
  - Similar EJ and non-EJ responses
- No disproportionate impacts on minority or low-income populations identified



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## Traffic Impacts



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### Traffic Impacts

- Pine Street entrance ramp to eastbound I-70 open at all times
- Westbound I-70 exit ramp to collector-distributor road open at all times
- Collector-distributor closed south of Ohio St. (no access to Fletcher Ave.)

**Closure Period:**

- Ohio St. exit – up to one year
- Michigan St. exit – up to one year



**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Traffic Operations Management

- Traffic Monitoring
  - Camera
  - System Detection
  - Other
- Traffic Control
  - Interstate System
  - Local Intersections
- Motorist Information
  - Wayfinding and Notifications
  - Real-Time Traffic Information
- Incident Management



**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Downtown Bridge Closures

- All I-65/I-70 bridges over local streets to be replaced, except:
  - Alabama St.
  - Roosevelt/Commerce Ave.
- Washington St. bridge to remain open with lane closures
- Closure of adjacent bridges not allowed at the same time

**Closure Period:**

- All local bridges – up to 90 days



**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Travel Demand Management (TDM)

- Mode Choice
  - Transit
  - Carpool/Vanpool
  - Bike/Walk
- Trip Reduction / Reschedule
  - Staggered Work hours
  - Flextime
  - Work from Home
- Public and employer TDM education program



**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Mobility Management Plan (MMP)

- MMP Goals
  - Optimize traffic operations on the available transportation network
  - Reduce overall roadway network demand
  - Provide enhanced motorist information
- MMP Activity Areas
  - MOT/Construction (Design-Build Team)
  - Traffic Operations Management
    - Subgroup – Emergency Response
  - Travel Demand Management (TDM)
  - Real-Time Traveler Information Systems



**NORTH SPLIT UPGRADES DRIVING PROGRESS**

MOBILITY MANAGEMENT PLAN  
Updated April 2020

Prepared by the Indiana Department of Transportation  
www.northsplit.com

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### Real-Time Traveler Information

- Traveler Information
  - Road closure advanced notifications
  - Social media – Facebook, Twitter
  - Public broadcast and print media
  - Changeable message freeway signs
- Real-time data sources
  - INDOT cameras and detection systems
  - Project cameras
  - Traffic apps – Waze, Google Travel
  - Vehicle probes



**NORTH SPLIT UPGRADES DRIVING PROGRESS**

30

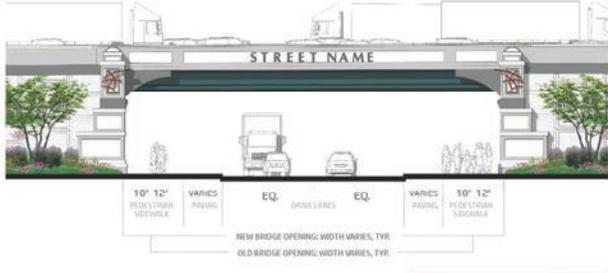
### Aesthetic Design Guidelines

- The purpose of the Aesthetic Design Guidelines is to provide the landscape architects with aesthetic direction for their final design.
- The Aesthetic Design Guidelines are the result of an extensive public engagement process over the last 12 months, including meetings with:
  - Local neighborhoods and neighborhood organizations
  - Local agencies and oversight departments
  - Key local resource groups
  - Local business organizations
  - Local stakeholders and stakeholder groups



31

### Aesthetic Design Guidelines



10' 12" PEDESTRIAN VEHICLE | VARIES TRUCKING | EQ. DRIVE LANES | EQ. | VARIES TRUCKING | 10' 12" PEDESTRIAN VEHICLE

NEW BRIDGE OPENING WIDTH VARIES, TYP.  
OLD BRIDGE OPENING WIDTH VARIES, TYP.

TYPICAL MAJOR GATEWAY BRIDGE ELEVATION

34

### Context Sensitive Solutions (CSS) Process



**MONTH 1** MONTH 3 | **MONTH 4** MONTH 6 | **MONTH 7** MONTH 9 | **MONTH 10** MONTH 12

**PART 1 VISIONING**  
 • Conduct Inventory and Assessment  
 • Develop Character and Themes

**PART 2 PRELIMINARY DESIGN TREATMENTS**  
 • Develop Conceptual Treatments  
 • Develop Conceptual CSS Plan

**PART 3 CSS DESIGN GUIDELINES PACKAGE**  
 • Review and Finalize CSS Design Treatments  
 • Develop Preferred Conceptual Plan Costs

**NEXT PHASE SPECIFICATIONS & STANDARD DETAILS**  
 • Develop specifications and standard details



32

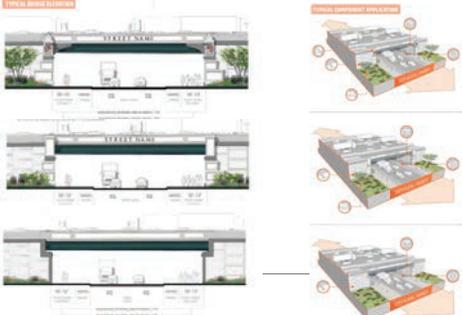
### Aesthetic Design Guidelines

**BRIDGES OPENINGS**

**Overview:**  
The proposed design of the bridge opening environment provides better pedestrian opening, walking a safer and more inviting environment for accompanying pedestrians and vehicles.

**Bridge Opening Types**  
These bridge opening types were developed for local roadway connections. These bridge opening types should be:

- Bridge Opening Type 1:** These bridge openings shall function as neighborhood gateways, attract street enhancements, and draw people to the neighborhood.
- Bridge Opening Type 2:** These bridge openings shall be visually similar to the Major Gateway Bridges.
- Bridge Opening Type 3:** These bridges shall occur at bridges within the municipality, where bridges connected between a set of Major or Minor Bridges or other areas where there is little or no pedestrian activity.




35

### CSS Public Engagement...by the Numbers



**12** Neighborhood Workshops | **2** Local Business Groups

**15** Neighborhoods | **4** Rethink Coalition Meetings

**400+** Residents Engaged | **6,000+** Comments Received



33

### Aesthetic Design Guidelines



Prototypical Treatment Application - Daytime View



36



37



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38

### Commerce/Roosevelt Avenue Underpass

- The I-70 bridge over Commerce Avenue will not be replaced in the North Split project.
- INDOT received comments in April 2020 to provide enhanced features similar to Alabama Street.
- INDOT adjusted plans at Commerce/Roosevelt in May/June 2020.

**NORTH SPLIT UPGRADES DRIVING PROGRESS**

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### Commerce/Roosevelt Avenue Underpass

- Existing bridge to remain in place
- Sidewalks to be replaced through bridge area
- Lighting fixtures to be replaced and upgraded
- Side slope landscape plantings
- Funding for mural on existing columns (if desired by community)

**NORTH SPLIT UPGRADES DRIVING PROGRESS**

42

### Next Steps

- Opportunity for public comment on EA
- Comment period ends August 17, 2020
- NEPA determination by FHWA concludes the environmental study process
- Construction start anticipated in late 2020
- Construction completion anticipated in 2022



43

### Public Comments

Verbal Public Comments



44



**NORTH SPLIT**  
**UPGRADES**  
DRIVING PROGRESS

**I-65/I-70 North Split Project**

Project Information: [www.northsplit.com](http://www.northsplit.com)



45



Date: Monday, August 3, 2020

Dear Interested Citizen:

**Welcome to the Indiana Department of Transportation's (INDOT) public hearing regarding the I-65/I-70 North Split Interchange Reconstruction in Indianapolis in Marion County.**

The purpose of this public hearing is to offer all interested persons an opportunity to comment on the North Split Interchange Reconstruction Environmental Assessment (EA).

There are several ways your comments may be presented this evening and following tonight's public hearing. You may submit comments in the following manner:

1. **Complete** a comment form and return it to an INDOT or North Split Project Team representative attending the public hearing. Comment forms are available at the Written Comments Table and are also included in your information packet.
2. **Participate** as speaker during the comment session following tonight's presentation.
3. **E-mail** comments to [info@northsplit.com](mailto:info@northsplit.com).
4. **Submit** comments via the North Split website comment form: <https://northsplit.com/contact-us/>
5. **Mail** comments to the North Split PO Box at P.O. Box 44141, Indianapolis, IN 46244.
6. **Call** the INDOT toll-free telephone number for the North Split at 1-877-799-6570 and leave comments in the voice mailbox.
7. **Submit** comments (or have comments postmarked) by **Monday, August 17, 2020**. Comments will be reviewed and considered as part of the INDOT decision-making process

### **Public Hearing Agenda**

Door Open at 4 p.m.

Meeting Called to Order

Formal presentations at 4:30 p.m. and 6 p.m.

Public Comment Session following each formal presentation

Project Open House

All substantive comments received prior to, during, and following the public hearing will be evaluated and responded to in writing within subsequent project documentation. The documentation will address concerns presented during the public hearing process and describe project decisions reached following careful consideration of the views and concerns of the public.

**The North Split Project Team will be available in the display area to explain project details and address questions prior to and following the public hearing.**

The Environmental Assessment document is available for public review and inspection at the following locations:

- North Split Website – <https://northsplit.com>
- HNTB Office – 111 Monument Circle, Suite 1200, Indianapolis, IN 46204
- Central Library – 40 E. Saint Clair Street, Indianapolis, IN 46204
- Spades Park Branch Library – 1801 Nowland Avenue, Indianapolis, IN 46201
- Garfield Park Branch Library – 2502 Shelby Street, Indianapolis, IN 46203
- Martindale-Brightwood Branch Library – 2434 N. Sherman Drive, Indianapolis, IN 46218

**Thank you for attending this evening's public hearing.**



## North Split Project

Project Location:	I-65 and I-70 North Split Interchange
Project Type:	Reconstruction
Time of Construction:	2021 - 2022

## Project Description

The Indiana Department of Transportation (INDOT) is rebuilding the North Split interchange, where I-65 and I-70 join in the northeast corner of downtown Indianapolis. As required by the National Environmental Policy Act of 1969 (NEPA), INDOT has completed an Environmental Assessment (EA) to evaluate project alternatives, to identify project impacts, and to solicit public input on the project.

## Project Purpose and Need

The North Split interchange was constructed in stages 50 to 60 years ago and most of the original infrastructure is still in place. Roads and bridges are deteriorated and the interchange layout is poorly suited for current traffic levels. The purpose and need for the project is defined as follows:

**PURPOSE:** The purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities within the North Split project area.

**NEED:** The project is needed in order to:

- Correct deteriorated bridge conditions
- Correct deteriorated pavement conditions
- Improve safety
- Improve interchange operations and reduce congestion

## Public Involvement

The project team conducted 21 public meetings, open houses, and neighborhood workshops during the NEPA process, and held more than 110 meetings with stakeholders, neighborhood groups, and agencies. Information has been shared on the project website, social media posts, text alerts, and e-newsletters. The following project advisory committees informed the process:

- Community Advisory Committee (CAC)
- Environmental Justice Working Group
- Section 106 Consulting Parties (historic impacts)
- Context Sensitive Solutions Resource Team

## Preferred Alternative

After an extensive screening process and multiple opportunities for public input, a preferred alternative was defined that meets the project purpose and need while effectively balancing service and community impact. The preferred alternative has a smaller, more compact footprint than the existing interchange, provides minimal widening and requires shorter retaining walls than other options, and can be constructed within existing right-of-way.

Two existing movements are eliminated to minimize impacts: the westbound I-70 exit to Pennsylvania Street and Delaware Street entrance ramp to the Collector-Distributor road, which serves North Street, Michigan Street, New York Street, Ohio Street, and Fletcher Avenue.



## Environmental Impacts

Impacts to both the human and natural environment were analyzed and the results are reported in the Environmental Assessment. The following key impact focus areas were identified:

**Historic Properties.** Adverse effects were identified for three historic districts/properties:

- Old Northside Historic District/Morris Butler House
- St. Joseph Neighborhood Historic District
- Chatham-Arch Historic District

Working with consulting parties, the State Historic Preservation Officer and others, INDOT adopted a series of commitments to mitigate impacts to these areas and properties. These commitments are documented in a Memorandum of Agreement.

**Highway Noise.** Models show the project will reduce noise at most locations, but levels will still exceed standards. After a series of neighborhood meetings and surveys of benefited receptors, two noise barriers are planned on the north side of I-70 east of the North Split. Noise reducing technologies will be applied throughout the project, including jointless pavement, jointless bridges, and “next generation” grooving.

**Environmental Justice (EJ).** The project team analyzed Census data, consulted with an EJ Advisory Committee, held numerous neighborhood meetings, and conducted a public survey of EJ and non-EJ communities. Disproportionate impacts on minority or low-income populations were not identified as a result of the project.

**Traffic Impacts.** Long-term traffic impacts will be minimal, but major traffic impacts are expected during construction as a segment of I-65 and I-70 is closed for two years. The I-65 to I-70 link across the north part of the interchange and I-70 ramps to and from the east side of downtown will be open. Arterial streets will be impacted by closures of up to 90 days due to replacement of underpasses.

## Mobility Management Plan (MMP)

INDOT is developing a Mobility Management Plan to optimize traffic operations outside the construction zone, reduce roadway network demand, and provide motorist information. Strategies include traffic signal system management; enhanced transit; promotion of vanpool, carpool, and non-motorized travel; work rescheduling; incident management; and real-time traffic information.

## Context Sensitive Solutions (CSS)

CSS is a collaborative decision-making process to involve stakeholders in creating a facility that fits into its setting. For the North Split, 12 CSS neighborhood workshops were conducted with over 400 residents engaged, and more than 2,700 comments were received during the process. Based on this input, a set of Aesthetic Design Guidelines was produced to provide direction for features such as landscaping, forms and colors, underpass treatments, pedestrian features, lighting, bridge piers and structure treatments, and public art space.

## Additional Project Information

Project documents, presentation materials, and technical information are available at the project website: [www.northsplit.com](http://www.northsplit.com).



## Preferred Alternative Overview Map

Des No: 1592385 & 1600808

Project: North Split Project

- Managed Lands
- Trail
- New Design
- Bridge
- Possible Retaining Wall
- C-D Collector-Distributor
- CSX Railroad

# COMMENTS AND QUESTIONS

---

NAME

PHONE (OPTIONAL)

---

ADDRESS

---

EMAIL ADDRESS

---

SUBSCRIBE TO E-MAIL UPDATES



877-799-6570

NorthSplit.com

info@NorthSplit.com

NORTHSPLIT.COM

# NORTH SPLIT UPGRADES DRIVING PROGRESS



PLACE  
STAMP  
HERE

North Split  
PO Box 44141  
Indianapolis, Indiana 46244

## 1 PROCEEDINGS

2  
3 CHAIR: Yes, sir.

4 JACOB BOWER-BIR: Sure.

5 CHAIR: Sir, if you could just come up here.  
6 We have a microphone in front. And if you could  
7 just make sure you state your name and make sure  
8 that -- correct spelling, so we can get it  
9 correctly in the record.10 JACOB BOWER-BIR: Just stand here? Okay.  
11 Cool. My name is Jacob Bower-Bir. I can spell it  
12 later. Okay. I've got limited time, so I will  
13 couch this and say that I appreciate you guys and  
14 the public work you do. That must be hard in a  
15 state like Indiana. And I guess -- I guess what I  
16 wanted -- my -- my comment is this: You have this  
17 logo, "Driving progress." I think it's supposed to  
18 mean, like, we're driving -- I'm driving in  
19 progress. But what it really says to me -- what  
20 this project says to me is that we are -- it's --  
21 it's driving progress. It's -- this is progress  
22 for drivers, you know, which is real progress, a --  
23 a broader meaningful progress, and a broader  
24 understanding of transportation would not be  
25 doubling down on this highway that cuts through the

1 center of our city and suggest that Indianapolis is  
2 a good city to drive through. It's -- we should be  
3 kind of repairing that scar that exists. It's --  
4 and it's this concrete -- it's this -- it's this  
5 strain on the environment. It's segregated our  
6 city more than it already was, and it makes it hard  
7 today to interconnect and enjoy the neighborhoods  
8 that would otherwise constitute the greater  
9 downtown area. And so my fear is that -- well, my  
10 -- my broader fear is that as an agency, you know,  
11 INDOT is -- is not about transportation. It's  
12 about cars, and it's about moving cars specifically  
13 quickly, and it's not integrated well with the  
14 urban fabric that is Indianapolis. And it's also  
15 -- well, my fear is also that we will be trapped in  
16 this 1960s and '70s mindset that by doubling down  
17 on this project and making these repairs, we are  
18 committing ourselves to this highway for longer  
19 instead of doing something that many other cities,  
20 cities like Phoenix -- and Indianapolis should not  
21 be competing with Phoenix. We should be better  
22 than Phoenix. You know, but they are finding ways  
23 to build over their highways and -- and help build  
24 better highways underground, or if the existing  
25 highway is on top of the ground, build over them,

1 or clever solutions that make sense in 2020. We're  
2 doing repairs that were engendered by construction  
3 techniques in the 1960s and '70s, and I feel like  
4 we're still designing like it's the 1960s and '70s.  
5 So I'll stop there. I do appreciate it. Thank  
6 you.

7 CHAIR: Could you just spell your last name?

8 JACOB BOWER-BIR: B-O-W-E-R, hyphen, B-I-R.

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1 CHAIR: Yes, ma'am?

2 CARLETTE DUFFY: Hello. Okay. So I guess my  
3 first -- it's more so of a question as in terms of  
4 the -- how does this affect the crossover or lead  
5 for coming from 70, getting off on West Street,  
6 because that's my neighborhood. So I'm wondering  
7 how -- and I travel that way a lot, so would that  
8 break that off? And if that's so, then where are  
9 the conversations with Ransom Place and the  
10 Eastbrook townhouse homes, which are neighborhoods  
11 that are over there that would be affected by that.  
12 And then also, due to what has happened in the past  
13 with contractors that are engaged in this process  
14 is that most of them are union, which is great, but  
15 what typically happens is they don't have the  
16 personnel in the area to hire from in their union  
17 pools, and they will go to surrounding states, and  
18 for two years' worth of work, people would be  
19 willing to come for that, but we have such a  
20 drastic need right here in the City of  
21 Indianapolis. So what can we do to encourage that  
22 the contractors, not only the ones that are doing  
23 the work in the area, but those also for -- who are  
24 already contractors in the area, that they will be  
25 offered opportunities in this. So looking for

1 employment opportunities for those who are working  
2 in Indy and who are living Indianapolis, and then  
3 also for those companies that could potentially  
4 participate.  
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1 CHAIR: Thank you. And as a reminder, we do  
2 have staff available downstairs that will be able  
3 to have one-on-one question and answers, however  
4 long it takes to get those addressed after this  
5 public session. Is there anybody else who would  
6 like to make a statement for the record? Yes, sir.

7 NATHAN BOWER-BIR: Okay. So my name is Nathan  
8 Bower-Bir. B-O-W-E-R, hyphen, B-I-R. I thank you  
9 again for this session. I'm starting to see the  
10 environmental justice impact assessment that was  
11 conducted, and as you noted, there were no  
12 disproportionate impacts on minority or low-income  
13 populations identified. However, we're thinking,  
14 on the divisions that the existing highway put into  
15 our city, that it further segregated the city and  
16 several of us to our neighborhoods. I wonder  
17 whether that assessment was historic looking as  
18 well because I -- it could be that that initial  
19 construction probably did disproportionately affect  
20 minority and low-income populations, and the  
21 continued existence of it maintains that historic  
22 injustice. And so while doing these repairs, or  
23 this reconstruction, may not introduce new  
24 disparities, but it very well could continue  
25 existing ones.

## Kia Gillette

---

**From:** Turnbow, Alisha <ATurnbow@idem.IN.gov>  
**Sent:** Thursday, August 6, 2020 5:11 PM  
**To:** Kia Gillette  
**Cc:** jhavard@citizensenergygroup.com; Blazey, Samuel  
**Subject:** RE: North Split Project (Des. Nos. 1592385 & 1600808) – Environmental Assessment (EA) Available for Review  
**Attachments:** IDEM Proximity to WPA (1592385 and 1600808).pdf

Hi Kia,

Find attached to this email a response to your proximity request for Des. Nos. 1592385 & 1600808. Note that the site is not located in a wellhead protection area though it is located within 2000 feet of a wellhead protection area and the interstate does run through a wellhead protection area so construction traffic might travel through the wellhead protection area for Citizens Water Indianapolis. The contact for Citizens Water is John Havard and he can be reached at [jhavard@citizensenergygroup.com](mailto:jhavard@citizensenergygroup.com) or (317) 693-8716. I have Copied John Havard from Citizens Water Indianapolis in case you would like to coordinate with them for the construction portion of this project for routing traffic. Let me know what questions you have.

Sincerely,

### COVID-19 Resources:

- **Indiana State Dept. of Health (ISDH) COVID-19 Call Center:** Call 877-826-0011 (available 8:00 am-5:00 pm daily).
- **Anthem NurseLine:** Call 800-337-4770 or visit the [Anthem NurseLine](#) online for a FREE symptom screening. Available to anyone with an Anthem health plan (this includes State of IN employees)
- **Anthem Employee Assistance Program (EAP):** Available to full-time state employees and their household members regardless of health plan participation. Call 800-223-7723 or visit [anthemep.com](http://anthemep.com) (enter State of Indiana) for crisis counseling, help finding child/elder care, legal/financial consultation and much more.



Alisha Turnbow  
 Environmental Manager  
 Office of Water Quality  
 Drinking Water Branch, Groundwater Section  
 (317) 233-9158 · [aturnbow@idem.IN.gov](mailto:aturnbow@idem.IN.gov)

Indiana Department of Environmental Management



**IDEM values your feedback.**

Have feedback on rates and compliance? Visit [www.idem.gov](#)




---

**From:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>  
**Sent:** Friday, July 17, 2020 11:44 AM  
**To:** Turnbow, Alisha <ATurnbow@idem.IN.gov>  
**Subject:** North Split Project (Des. Nos. 1592385 & 1600808) – Environmental Assessment (EA) Available for Review

**\*\*\*\* This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. \*\*\*\***

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Dear Ms. Turnbow,



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb  
Governor

Bruno Pigott  
Commissioner

August 6, 2020

66-33  
HNTB Corporation  
Attention: Kia M. Gillette  
PO Box 44141  
Indianapolis, Indiana 46244

Dear Kia M. Gillette,

RE: Wellhead Protection Area  
Proximity Determination  
Des No 1592385 & 1600808  
I-65/I-70 North Split Interchange  
Reconstruction Project  
Indianapolis, Marion County, Indiana

Upon review of the above referenced project site, it has been determined that the proposed project area **is not located within** a Wellhead Protection Area. The information is accurate to the best of our knowledge; however, there are in some cases a few factors that could impact the accuracy of this determination. Some Wellhead Protection Area Delineations have not been submitted, and many have not been approved by this office. In these cases we use a 3,000 foot fixed radius buffer to make the proximity determination. To find the status of a Public Water Supply System's (PWSS's) Wellhead Protection Area Delineation please visit our tracking database at <http://www.in.gov/idem/cleanwater/2456.htm> and scroll to the bottom of the page.

The project area **is not located within** a Source Water Assessment Area for a PWSS's surface water intake. The Source Water Assessment Area relates to the surface water drainage area that water could potentially flow and influence water quality for a PWSS's source of drinking water.

Note: the Drinking Water Branch has a self service feature which allows one to determine wellhead proximity without submitting the application form. Use the following instructions:

1. Go to <https://www.in.gov/idem/cleanwater/pages/wellhead/>
2. Use the search tool located in the upper left hand corner of the application to zoom to your site of interest by way of city, county, or address; or use the mouse to click on the site of interest displayed on the map.
3. Once the site of interest has been located and selected, use the print tool to create a .pdf of a wellhead protection area proximity determination response.

In the future please consider using this self service feature if it suits your needs.

If you have any additional questions please feel free to contact me at the address above or at (317) 233-9158 and [aturnbow@idem.in.gov](mailto:aturnbow@idem.in.gov).

Sincerely,

Alisha Turnbow,  
Environmental Manager  
Ground Water Section  
Drinking Water Branch  
Office of Water Quality



Please Reduce, Reuse, Recycle

**From:** [McWilliams, Robin](#)  
**To:** [Kia Gillette](#)  
**Subject:** Re: [EXTERNAL] North Split Project (Des. Nos. 1592385 & 1600808) – Environmental Assessment (EA) Available for Review  
**Date:** Monday, August 10, 2020 3:21:08 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

---

Dear Kia,

Thank you for providing the Environmental Assessment for our review. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, and the U. S. Fish and Wildlife Service's Mitigation Policy.

The area is within the range of the Indiana bat (*Myotis sodalis*) and the northern long-eared bat (*Myotis septentrionalis*). Both of these species are covered by the 2016 Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana Bat and Northern Long-Eared Bat (updated 2018) and a No Effect determination has been made by the Federal Highway Administration for this project (IPAC determination key accessed September 16, 2019). The project is in an urban area and consists of interstate right of way and various residential and commercial land uses; impacts to suitable bat habitat are not anticipated.

Based on a review of the information you provided, the U.S. Fish and Wildlife Service has no objections to the project as currently proposed. We support the use of native trees for all revegetation work, downward facing lighting that minimizes blue light, storm water treatment prior to entering receiving streams, along with the other environmental commitments that have been made. This precludes the need for further consultation on this project as required under Section 7 of the Endangered Species Act of 1973, as amended. However, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinitiate consultation.

We appreciate the opportunity to comment at this early stage of project planning. If you have any questions about our recommendations, please contact [robin\\_mcwilliams@fws.gov](mailto:robin_mcwilliams@fws.gov).

Sincerely,  
Robin McWilliams Munson

Robin McWilliams Munson  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
620 South Walker Street  
Bloomington, IN 46142

<b>THIS IS NOT A PERMIT</b>
-----------------------------

**State of Indiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**Division of Fish and Wildlife**  
**Early Coordination/Environmental Assessment**

---

**DNR #:** ER-20144-1**Request Received:** July 17, 2020

**Requestor:** HNTB Corporation  
 Kia Gillette  
 111 Monument Circle, Suite 1200  
 Indianapolis, IN 46204-5178

**Project:** I-65/I-70 North Split Interchange Reconstruction: I-65/I-70 south to the Washington Street interchange, I-65 west to Alabama Street, and I-70 east to Valley Avenue, Indianapolis; Des #1592385 & 1600808; Environmental Assessment

**County/Site info:** Marion

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

If our agency has regulatory jurisdiction over the project, the recommendations contained in this letter may become requirements of any permit issued. If we do not have permitting authority, all recommendations are voluntary.

**Regulatory Assessment:** Formal approval by the Department of Natural Resources under the regulatory programs administered by the Division of Water is not required for this project.

**Natural Heritage Database:** The Natural Heritage Program's data have been checked. The state endangered Kirtland's snake (*Clonophis kirtlandii*) has been documented within 1/2 mile southwest of the project area.

**Fish & Wildlife Comments:** The Kirtland's snake records are in highly developed areas. One record is over 30 years old, and the other is in an area where the snakes were collected and relocated to avoid impacts to them due to other development in the area. This species was not found during a previous site visit by the DNR's herpetologist; however, these snakes could still be in the area. To minimize impacts to this species, we recommend installing a silt fence around any construction areas where ground disturbance will occur.

Based on information provided for review as well as information presented at the Resource Agency Meetings held on November 3, 2017, and April 30, 2020, the Division of Fish and Wildlife (DFW) concurs that existing habitat features within the project area are likely low quality features related to existing infrastructure (roadside ditches, medians, etc.). However, the DFW would like to highlight the following issues as areas for potential improvement of existing conditions to reduce negative impacts to fish, wildlife, and/or botanical resources and the habitat in an urban environment:

1) Revegetation:

The DFW recommends coordination with the CORRIDORS program. CORRIDORS (Conservation On Rivers and Roadways Intended to Develop Opportunities for Resources and Species) is a DFW program to develop habitats for grassland-dependent species and to foster improved pollinator habitat along roadways and waterways. Program partners include the Indiana Department of Transportation (INDOT), USDA Natural Resources Conservation Service (NRCS), Pheasants Forever and Quail Forever. See <https://www.in.gov/dnr/fishwild/9405.htm> for more information in this program.

**State of Indiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**Division of Fish and Wildlife**  
**Early Coordination/Environmental Assessment**

---

2) Urban Tree Loss:

Over 5 acres of urban tree loss is expected as part of the project. Expansive tree planting is proposed as part of the project. However, there were a number of non-native species, horticultural varieties, and hybrid cultivars that are proposed. The DFW recommends avoiding removing urban trees to the greatest extent possible and replacing trees that must be removed. Street trees are important to fish and wildlife resources in urban areas. Indiana's street trees also provide millions of dollars of tangible benefits to Indiana communities by their presence in the urban environment. Their shade and beauty contribute to the quality of life. They provide significant increases in real estate values, create attractive settings for commercial businesses, and improve community neighborhood appeal. Trees decrease energy consumption by providing shade and acting as windbreaks. They reduce water treatment costs and impede soil erosion by slowing the runoff of stormwater. Trees also cool the air temperature, cleanse pollutants from the air, and produce oxygen while absorbing carbon dioxide. Trees are an integral component of the urban environment. Proactively managing and maintaining a street tree population will ultimately maximize the benefits afforded by their aesthetic and ecological functions. The following links give a good overview of the benefits of a street tree program and how to select the right species to avoid the negative impacts of non-native invasive species such as the common and popular Bradford pear: <https://www.in.gov/dnr/forestry/3605.htm> > Community & Urban Forestry > Tree Species Lists.

3) Lighting:

The need for new lighting along the reconstructed I-65 / I-70 North Split interchange was mentioned during the Resource Agency Meetings. Most transportation corridor designers and municipalities are trending toward LED lighting. Certain types of LED lighting can have negative impacts on both human and wildlife health and safety. Scientific evidence suggests that artificial light at night has negative and deadly effects on many organisms including amphibians, birds, mammals, insects and plants (see <https://www.darksky.org/light-pollution/wildlife/>). A June 2016 American Medical Association (AMA) report, "Human and Environmental Effects of Light Emitting Diode Community Lighting," concluded that "white LED street lighting patterns may contribute to the risk of chronic disease in the populations of cities in which they have been installed."

The International Dark-Sky Association has developed recommendations for communities choosing LED lighting systems that will aid in the selection of lighting that is energy and cost efficient, yet ensures safety and security, protects wildlife, and promotes the goal of reducing light pollution. See <https://www.darksky.org/our-work/lighting/lighting-for-citizens/led-guide/>.

4) Storm Water Management:

Storm water management was mentioned as an issue of concern based on information provided for review as well as information presented at the Resource Agency Meeting. The DFW recommends considering a more sustainable approach to stormwater management. The traditional model of stormwater management aims to drain urban runoff as quickly as possible with the help of channels and pipes, which increases peak flows and costs of stormwater management. This type of solution only transfers flood problems from one section of the basin to another section. A more sustainable approach aims to rebuild the natural water cycle by using storage techniques (retention basins, constructed wetlands, raingardens, etc.), recharging groundwater using infiltration techniques (infiltration basins or trenches, pervious pavement, etc.), and reusing runoff for irrigation elsewhere in the basin. The following links give a good overview of traditional and sustainable stormwater management systems and their pros and cons for consideration during the design of the proposed project: <https://www.epa.gov/greeningepa/epa-facility-stormwater-management>;

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**State of Indiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**Division of Fish and Wildlife**  
**Early Coordination/Environmental Assessment**

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<https://www.epa.gov/greeningepa/stormwater-management-practices-epa-facilities>.

The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:

1. Revegetate all bare and disturbed areas that are not currently mowed and maintained with a mixture of grasses, sedges, and wildflowers native to Central Indiana as soon as possible upon completion; turf-type grasses (including low-endophyte, friendly endophyte, and endophyte free tall fescue but excluding all other varieties of tall fescue) may be used in currently mowed areas only.
2. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the stream or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.
3. Seed and protect all disturbed streambanks and slopes not protected by other methods that are 3:1 or steeper with erosion control blankets that are heavy-duty, biodegradable, and net free or that use loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.

**Contact Staff:**

Christie L. Stanifer, Environ. Coordinator, Fish & Wildlife  
Our agency appreciates this opportunity to be of service. Please contact the above staff member at (317) 232-4080 if we can be of further assistance.

*Christie L. Stanifer*

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Christie L. Stanifer  
Environ. Coordinator  
Division of Fish and Wildlife

**Date:** August 14, 2020



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

August 14, 2020

REPLY TO THE ATTENTION OF:  
 Mail Code RM-19J

Michelle Allen  
 Federal Highway Administration – Indiana Division  
 575 North Pennsylvania Street, Room 254  
 Indianapolis, Indiana 46204  
[Michelle.allen@dot.gov](mailto:Michelle.allen@dot.gov)

Project Manager  
 Indiana Department of Transportation  
 100 North Senate Avenue, Room 642  
 Indianapolis, Indiana 46204  
[rshi@indot.in.gov](mailto:rshi@indot.in.gov)

Re: Environmental Assessment (EA) - Interstate 65/Interstate 70 (I-65/I-70) North Split Interchange Reconstruction Project, Indianapolis, Marion County, Indiana. (DES.Nos. 1592385 & 1600808)

Dear Ms. Allen and Mr. Shi:

The U.S. Environmental Protection Agency (EPA) has reviewed the Environmental Assessment (EA), dated July 9, 2020, for the referenced North Split Interchange Project (North Split Project). We are providing comments pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities leading to and through the I-65/I-70 North Split interchange in downtown Indianapolis. The project is proposed in order to correct deteriorating bridge and pavement conditions, improve safety and enhance interchange operations. The EA assesses impacts associated with the Alternative 4C; the preliminary preferred alternative identified in the North Split Interchange Project Alternatives Screening Report (9/12/2018). Alternative 4C does not include additional travel lanes. No relocations are expected. All construction takes place within existing rights-of-way. Construction of the project is expected to last for two years. When completed, the project is expected to provide reduced congestion and improvement in levels of service into 2041.

The EPA recognizes the importance of rehabilitating and improving existing infrastructure while assuring environmental and public health protection. We appreciated the opportunity for early engagement in the environmental review process. EPA provided early coordination comments regarding the environmental analysis for the proposed North Split Project (EPA letter dated 11/20/2017). We commented on the Alternatives Screening Report (EPA letter dated 10/24/2018) and participated in the four Resource Agency Meetings (via webinar/conference calls on 11/03/2017, 5/22/2018, 10/17/2018 and 4/30/2020).

The EA documentation does a good job of identifying impacts and capturing the concerns of resource agencies, the public, and the neighborhoods and environmental justice populations nearest to the project area. Section J – ENVIRONMENTAL COMMITMENTS list sixty (60) “Firm” commitments and nine (9) commitments for “For Further Consideration”.

EPA notes that INDOT will give, in part, further consideration to: 1) strategies to reduce diesel emissions, such as project construction/demolition contracts that require the use of equipment with clean diesel engines and the use of clean diesel fuels; 2) the use of energy efficient lighting, including solar powered lights; 3) the incorporation of native saplings and shrubs into the landscape plan for the right-of-way, to help reduce noise and maintain air quality for nearby residences and trail users; and 4) the incorporation of more sustainable approaches to stormwater management, such as retention basins, constructed wetlands, and raingardens and the use of runoff for irrigation elsewhere in the watershed.

#### Recommendations:

- EPA continues to recommend the project be designed and constructed, if feasible, to capture and treat roadway stormwater runoff and hazardous materials spills prior to discharging to Waters of the U.S.
  
- Establish construction materials hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents.

In addition, we note the extensive public involvement and outreach efforts made to date to engage, consider, and document input from the public, including the environmental justice communities. The EA, Appendix-K, Environmental Justice Technical Memorandum (224 pages) documents this effort and identifies potential avoidance, minimization and mitigation measures (Table 6: Environmental Justice Effects Summary). EPA supports continued community engagement through project completion.

EPA appreciates the opportunity to review the EA for the North Split Interchange Project. If you have any questions regarding our comments, please contact Virginia Laszewski, of my staff, by

phone: 312/886-7501 or by email: [laszewski.virginia@epa.gov](mailto:laszewski.virginia@epa.gov). Please provide us with an e-version of the NEPA determination when available.

Sincerely,

**KENNETH  
WESTLAKE** Digitally signed by  
KENNETH WESTLAKE  
Date: 2020.08.14  
15:11:53 -05'00'

Kenneth A. Westlake  
Deputy Director, Tribal and Multi-media Programs Office  
Office of Regional Administrator

Cc (via email):

Kia Gillette, Environmental Project Manager, HNTB Corporation, [kgillette@hntb.com](mailto:kgillette@hntb.com)

Deborah Snyder, U.S. Army Corps of Engineers, [Deborah.D.Snyder@usace.army.mil](mailto:Deborah.D.Snyder@usace.army.mil)

Robin McWilliams-Munson, U.S. Fish and Wildlife Service,

[Robin\\_McWilliams@fws.gov](mailto:Robin_McWilliams@fws.gov)

Matt Buffington, Indian Department of Natural Resources, [mbuffington@dnr.in.gov](mailto:mbuffington@dnr.in.gov)

Jay Turner, Indiana Department of Environmental Management, [JTurner2@idem.in.gov](mailto:JTurner2@idem.in.gov)

North Split Project Comment Site, [info@northsplit.com](mailto:info@northsplit.com)

## Kia Gillette

---

**From:** Mark Godley <mgodley@chestnut.org>  
**Sent:** Thursday, July 30, 2020 10:07 AM  
**To:** Kia Gillette  
**Subject:** RE: North Split CAC Meeting, Virtual Public Information Meeting, and Public Hearing

Hi Kia,

Just left a v-msg on your office phone requesting a return call. I know you are busy getting ready for the public hearing this evening so maybe it is easier to just respond quickly to an email.

What I wanted to ask you was whether or not the Delaware St ramp onto I65 will actually be rebuilt, including the infrastructure underneath it (i.e., concrete sloping embankment). I know modifications will affect this ramp so I was wondering whether it will be entirely rebuilt (understanding that the I65 bridge over Alabama St. will not be rebuilt).

Thank you,

Mark Godley  
 Cell: 309-825-2026

---

**From:** Kia Gillette <kgillette@HNTB.com>  
**Sent:** Wednesday, July 15, 2020 12:30 PM  
**To:** aalexander@purposeoflifeministries.com; andybeck95@gmail.com; anthonybrk7@gmail.com; awaggoner@salesforce.com; awatson@indianablackexpo.com; bbuchanan@buchanangroup.org; bcorbin@eiteljorg.com; beth.white@indygipc.org; bookem4096@gmail.com; bsaunders@spd.in.gov; bshine@sunkingbrewing.com; burnsgutzwiller@gmail.com; Chelsea Humble (chelsea.humble@rileyarea.org) <chelsea.humble@rileyarea.org>; chelsea@mkna.org; chrispryor@mibor.com; creiter@indyindians.com; Daniel Parker (Daniel.Parker@indy.gov) <Daniel.Parker@indy.gov>; dgreene@purposeoflifeministries.com; estyron@zionsville-in.gov; Garry Chilluffo <garry@chilluffo.com>; gary@intrucking.org; gbrock@tammcapitalgroup.com; gellis@indianachamber.com; Glenn Blackwood <glennblackwood@gmail.com>; Gremling, Anna M. <Anna.Gremling@IndyMPO.org>; haizlip@gmail.com; ievans@indygo.net; Isaac McCoy (isaac.mccoy@indy.gov) <isaac.mccoy@indy.gov>; james.wells2@indy.gov; jbrainard@carmel.in.gov; Jen.higginbotham@indympo.org; jgebhard@cirta.us; jkharbanda@hecweb.org; jlawson@whitestown.in.gov; Joe Jarzen <jjarzen@kibi.org>; joel.reuter@rolls-royce.com; Jordan Ryan <jordanblairryan@gmail.com>; jrboehm@iupui.edu; jsutherland@citizensenergygroup.com; Ken Avidor <ken.avidor@gmail.com>; khaley@indyculturaltrail.org; kirwin@hbdin.org; kjbannon@gmail.com; kolson@citact.org; Lawrence.mccormack@cummins.com; Lopez, Danny <DLopez@PACERS.com>; Marjorie Kienle <mlkienle@indy.rr.com>; Mark Beebe <mbeebe@lancerbeebe.com>; Mark Godley <mgodley@chestnut.org>; Marsh Davis (mdavis@indianalandmarks.org) <mdavis@indianalandmarks.org>; mayor@greenwood.in.gov; mayorfadness@fishers.in.us; 'Meg Storrow' <storrow@storrowkinsella.com>; mfisher@indychamber.com; msnyder@visitindy.com; nparr@co.boone.in.us; office@inasla.org; Paul Knapp (pknapp@yandl.com) <pknapp@yandl.com>; paul.suiters@icclos.com; Purnsley, Meg T <Meg.Purnsley@indy.gov>; ritzmann@browncounty-in.us; rmenyhart@taftlaw.com; robinsonsarah@myips.org; Ruth Morales (ruth.morales@indy.gov) <ruth.morales@indy.gov>; rvaughn@indianasportscorp.org; sandy cummings <sandycummings2003@yahoo.com>; scotty@scotty.me; Sherry Seiwert (sherry@downtownindy.org) <sherry@downtownindy.org>; silversheba14@msn.com; smeyer@kingpark.org; sosburn@ncaa.org; tad.indy@gmail.com; tdombrosky@co.hendricks.in.us; Tedd Grain (tgrain@lisc.org) <tgrain@lisc.org>; trustee@whiterivertownship.org; voposili@gmail.com  
**Cc:** Runfa Shi (rshi@indot.IN.gov) <rshi@indot.IN.gov>; bshattuck@indot.IN.gov; Laura Hilden (lhilden@indot.IN.gov) <lhilden@indot.IN.gov>; Miller, Brandon <BraMiller1@indot.IN.gov>; Ronald Bales (rbales@indot.IN.gov)

**From:** [Mark Godley](#)  
**To:** [Kia Gillette](#)  
**Cc:** [Zach Adamson](#); [Megan Robinson](#); [Garry Chilluffo \(garry@chilluffo.com\)](#); [Jan Good \(janmgood@sbcglobal.net\)](#); [Ben Langebartels \(langeba@sbcglobal.net\)](#); [Mindy McCutchan \(mindy.mccutchan@gmail.com\)](#); [Chris Palmer \(chris.mark.palmer@gmail.com\)](#); [Mark Sprout](#)  
**Subject:** RE: North Split CAC Meeting, Virtual Public Information Meeting, and Public Hearing  
**Date:** Friday, August 14, 2020 3:50:42 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[St Joseph EA response 8-12-2020.docx](#)

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Kia,

Attached is the St Joseph response to the EA presented on July 27, 2020. Thank you for the opportunity to provide additional input. I look forward to further communication and planning that affects the quality of life of St Joseph Historic Neighborhood residents.

Kind regards,

Mark

Mark Godley  
 SJHNA President




---

**From:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>  
**Sent:** Wednesday, July 15, 2020 12:30 PM  
**To:** [aalexander@purposeoflifeministries.com](mailto:aalexander@purposeoflifeministries.com); [andybeck95@gmail.com](mailto:andybeck95@gmail.com); [anthonybrk7@gmail.com](mailto:anthonybrk7@gmail.com); [awaggoner@salesforce.com](mailto:awaggoner@salesforce.com); [awatson@indianablackexpo.com](mailto:awatson@indianablackexpo.com); [bbuchanan@buchanangroup.org](mailto:bbuchanan@buchanangroup.org); [bcorbin@eiteljorg.com](mailto:bcorbin@eiteljorg.com); [beth.white@indygipc.org](mailto:beth.white@indygipc.org); [bookem4096@gmail.com](mailto:bookem4096@gmail.com); [bsaunders@spd.in.gov](mailto:bsaunders@spd.in.gov); [bshine@sunkingbrewing.com](mailto:bshine@sunkingbrewing.com); [burnsgutzwiller@gmail.com](mailto:burnsgutzwiller@gmail.com); Chelsea Humble ([chelsea.humble@rileyarea.org](mailto:chelsea.humble@rileyarea.org)) <[chelsea.humble@rileyarea.org](mailto:chelsea.humble@rileyarea.org)>; [chelsea@mkna.org](mailto:chelsea@mkna.org); [chrispryor@mibor.com](mailto:chrispryor@mibor.com); [creiter@indyindians.com](mailto:creiter@indyindians.com); Daniel Parker ([Daniel.Parker@indy.gov](mailto:Daniel.Parker@indy.gov)) <[Daniel.Parker@indy.gov](mailto:Daniel.Parker@indy.gov)>; [dgreene@purposeoflifeministries.com](mailto:dgreene@purposeoflifeministries.com); [estyron@zionsville-in.gov](mailto:estyron@zionsville-in.gov); Garry Chilluffo <[garry@chilluffo.com](mailto:garry@chilluffo.com)>; [gary@intrucking.org](mailto:gary@intrucking.org); [gbrock@tammcapitalgroup.com](mailto:gbrock@tammcapitalgroup.com); [gellis@indianachamber.com](mailto:gellis@indianachamber.com); Glenn Blackwood <[glennblackwood@gmail.com](mailto:glennblackwood@gmail.com)>; Gremling, Anna M. <[Anna.Gremling@IndyMPO.org](mailto:Anna.Gremling@IndyMPO.org)>; [haizlip@gmail.com](mailto:haizlip@gmail.com); [ievans@indygo.net](mailto:ievans@indygo.net); Isaac McCoy ([isaac.mccoy@indy.gov](mailto:isaac.mccoy@indy.gov)) <[isaac.mccoy@indy.gov](mailto:isaac.mccoy@indy.gov)>; [james.wells2@indy.gov](mailto:james.wells2@indy.gov); [jbrainard@carmel.in.gov](mailto:jbrainard@carmel.in.gov); [Jen.higginbotham@indympo.org](mailto:Jen.higginbotham@indympo.org); [jgebhard@cirta.us](mailto:jgebhard@cirta.us); [jkharbanda@hecweb.org](mailto:jkharbanda@hecweb.org); [jlawson@whitestown.in.gov](mailto:jlawson@whitestown.in.gov); Joe Jarzen <[jjarzen@kibi.org](mailto:jjarzen@kibi.org)>; [joel.reuter@rolls-royce.com](mailto:joel.reuter@rolls-royce.com); Jordan Ryan <[jordanblairryan@gmail.com](mailto:jordanblairryan@gmail.com)>; [jrboehm@iupui.edu](mailto:jrboehm@iupui.edu); [jsutherland@citizensenergygroup.com](mailto:jsutherland@citizensenergygroup.com); Ken Avidor <[ken.avidor@gmail.com](mailto:ken.avidor@gmail.com)>;



August 12, 2020

Ms. Kia Gillette  
Environmental Project Manager  
HNTB CORPORATION  
111 Monument Circle, Suite 1200  
Indianapolis, IN 46204  
Email [kgillette@hntb.com](mailto:kgillette@hntb.com)

**RE: St. Joseph Historic Neighborhood Response to Environmental Assessment**

Dear Kia:

On behalf of St. Joseph's Historic Neighborhood Association we appreciate the opportunity to provide input regarding the Northsplit Environmental Assessment. My comments below focus on plans outlined regarding the Alabama St underpass. We understand that Northsplit reconstruction work essentially ends at the east end of the Alabama St bridge that divides St Joseph Historic Neighborhood from the Old Northside Neighborhood. We also understand that additional modifications will be made to the Delaware St ramp to I65 which is coterminous with I65 extending from Delaware St to Alabama St. The Delaware ramp is in St Joseph and also forms part of the Alabama St. overpass along with I65.

In listening to the July 27, 2020 EA presentation we learned that Alabama St overpass will remain intact but that a few enhancements will be made to underpass area. Those enhancements include improved lighting under the Delaware St ramp and I65 bridge as they cross Alabama St. This is important as the present lights work only occasionally. We also understand there are plans to replace existing sidewalk with pavers. This will be a welcomed upgrade and enhance the appearance of the underpass along both sides of Alabama St. We are concerned, however, that their appearance will soon look shabby and unkempt because of the runoff from rain which allows debris (concrete particles, stones, and dirt) to travel down the concrete sloped abutment (east side of Alabama). This results in a muddy mess that hardens and becomes difficult to remove. We urge INDOT to remedy this when making the above described improvements.

About two years ago INDOT began the process of painting the underside steel support beams of the bridge green. This was done over Alabama St. and we strongly urge INDOT to finish this work as refreshed paint will contribute to the maintenance of the steel beams and further improve the environment under the bridge making it more appealing for the hundreds of pedestrians and bicyclists who pass under it each day. We also urge sound deadening material be installed immediately under the bridge. The decibel level is extraordinarily high under the bridge making it both a direct and indirect safety hazard for pedestrians and bicyclists.

We appreciate the discussions we have had with you, Kia and Ron Brown regarding the sloped abutments. As we have discussed, on both the east and west side of Alabama St under the Delaware ramp homeless encampments crop up and have been present for over two years. The collection of debris is astounding and while I believe INDOT has plans to remove the debris – that

is only a temporary solution. Although posting signs and fencing have been attempted these are not effective solutions. We urge INDOT to provide treatments to these sloped abutments that prevent the possibility of encampments.

We also understand from previous discussions with you and others that INDOT may provide resources for neighborhood signs. I think we agree that signs on the bridges may not be the best way to accomplish this given they would either be marking the neighborhood as one is leaving it or marking it while in a different neighborhood.. Instead we encourage dialogue with St. Joseph representatives and Old Northside representatives to collaborate on neighborhood banners or signs.

Respectfully submitted,



Mark D. Godley  
President  
St. Joseph Historic Neighborhood Board of Directors

cc: St. Joseph Board of Directors  
Zach Adamason, City-County Councilman  
Megan Robinson, President, Old Northside

## Kia Gillette

---

**From:** May, Ethan <emay@indystar.com>  
**Sent:** Wednesday, July 22, 2020 10:26 AM  
**To:** info@northsplit.com; Kia Gillette; Duncan, Mallory  
**Subject:** FW: INDOT to host public hearing regarding I-65/I-70 North Split Interchange Reconstruction Project, Indianapolis, Marion County

Good morning!

I read through this report yesterday, and I had a few questions:

1. After these public hearings, what's the next stop for this project?
2. The document indicates construction would start in Winter 2020. Is this a firm date?
3. Are the details about what work is to be done finalized or is there still potential for significant change?

Thank you for your time.

### Ethan May

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Office: 317-444-4682  
 Mobile: 317-402-1058

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**From:** Indiana Department of Transportation <indot@subscriptions.in.gov>  
**Sent:** Tuesday, July 21, 2020 3:13 PM  
**To:** May, Ethan <emay@indystar.com>  
**Subject:** INDOT to host public hearing regarding I-65/I-70 North Split Interchange Reconstruction Project, Indianapolis, Marion County

**The Indiana Department of Transportation (INDOT) will host a public hearing on August 3, 2020 at the Ivy Tech Community College Culinary and Conference Center, 2820 N. Meridian St., Indianapolis, IN 46208. Doors will open at 4:00 p.m. There will be presentations at 4:30 p.m. and 6 p.m. Parking is free for the public hearing. Social distancing guidelines will be followed. The capacity of each presentation is limited to 66 people to allow for social distancing. Project team members will wear face masks, and project exhibits will be spaced six feet apart. Hand sanitizer will be available, and attendees are required to wear face masks per the July 9 mandate by Marion County. Disposable face masks will be provided if attendees do not bring their own masks.**

The purpose of the public hearing is to offer all interested persons an opportunity to comment on the Environmental Assessment for the I-65/I-70 North Split Interchange Reconstruction in Indianapolis in Marion County. The purpose of the project is to rehabilitate and improve the existing interstate facilities leading to and through the I-65/I-70 North Split interchange in downtown Indianapolis. The needs for the project are correct deteriorated bridge conditions, correct deteriorated pavement conditions, improve safety, and improve interchange operations and reduce congestion.

## Kia Gillette

---

**From:** Windsor Park <wearewindsorpark@gmail.com>  
**Sent:** Thursday, July 23, 2020 12:45 PM  
**To:** Kia Gillette  
**Subject:** Re: Windsor Park Neighborhood Association, Inc. response to INDOT MOU Des No. 1592385 and 1600808, North Split Interchange reconstruction

Kia-  
 Was our letter, below, sent on June 30th included in INDOT's record?  
 For past communications, you sent an email confirming receipt and addition to the record.  
 I could not find our neighborhood's comments when searching the online record to review the EA report. It is possible that I just looked in the wrong place.  
 Please advise,  
 Jen Eamon  
 Pres., Windsor Park Neighborhood Association, Inc.

----- Forwarded message -----

**From:** Windsor Park <[wearewindsorpark@gmail.com](mailto:wearewindsorpark@gmail.com)>  
**Date:** Tue, Jun 30, 2020 at 6:35 PM  
**Subject:** Windsor Park Neighborhood Association, Inc. response to INDOT MOU Des No. 1592385 and 1600808, North Split Interchange reconstruction  
**To:** Kia Gillette <[kgillette@hntb.com](mailto:kgillette@hntb.com)>  
**Cc:** <[williehawkins89@gmail.com](mailto:williehawkins89@gmail.com)>, Spades Park <[Spadesparkindy@gmail.com](mailto:Spadesparkindy@gmail.com)>, Zach Adamson <[zach@adamsonforindy.com](mailto:zach@adamsonforindy.com)>, Wells, James L. <[James.Wells2@indy.gov](mailto:James.Wells2@indy.gov)>

June 30th, 2020

Kia Gillette-

Windsor Park Neighborhood Association, Inc. cannot sign the MOU as a concurring party because the plan does not satisfy concerns raised during the CSS process and the solutions designed are not equitable.

For most of the underpasses, there are planned upgrades that will improve pedestrian and bike access, lighting and landscaping. Unfortunately, the Roosevelt Ave/Commerce Avenue underpass, while originally under discussion to receive the same treatment, was left out of the final plan. **This means that the neighborhoods that have the worst connectivity to each other and that also happen to have a higher percentage of neighbors who do not own a car, will be excluded from the basic pedestrian and bicycling upgrades planned for the North Split area.**

Windsor Park neighbors find this problematic. We view INDOT's decision regarding this underpass as a continuation of the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color- and a lack of parity. **We see a need for restorative justice.** This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood.

Impacts on our neighborhoods should have been considered more carefully as a part of INDOT's review. ([https://secure.in.gov/indot/files/ES\\_EnvironmentalJusticeGuidance\\_2012.pdf](https://secure.in.gov/indot/files/ES_EnvironmentalJusticeGuidance_2012.pdf))

**You have already received a copy of the letter the Commerce Ave. Stakeholders have sent to Mayor Hogsett and City Councillors and may also view our joint letter [here](#).** The letter explains why we think this is needed, our goals, map, photos and demographic data.

Furthermore, we are not assured that sound levels in our community will not increase. Previously, you explained that, while our neighborhood would have an imperceptible increase in noise, it would be mitigated by the new overpass- which was planned to be quieter due to no expansion joints and sound reducing pavement.

We are also concerned that, while verbal assurances have been made regarding the landscaping, hardscaping and artwork under the 10th Street underpass (Payne Connection), details to protect these investments have not been placed in the MOU.

We hope that INDOT will reconsider it's plan and final MOU to include:

- Reduce Roosevelt/Commerce Avenue to 3 lanes between 16th Street and Brookside Parkway to slow traffic and make room for wider sidewalks and safer bicycling
- Cut back the underpass slope to allow more light and an improved sense of spaciousness for pedestrians
- Construct a Commerce Avenue Connector Trail parallel and adjacent to the interstate linking to the Monon, Cultural, and Pogue's Run Trails that restores neighborhood and downtown connectivity
- Replace and upgrade intersection and signals appropriate to safe pedestrian and bicycle crossings (given the heavy truck traffic)
- Fill in the missing sidewalk links for safe connectivity since this is the only connecting north- south passage between Rural Street and College Avenue
- Create a neighborhood gateway for Martindale Brightwood and a portal between the neighboring Near East neighborhoods
- Share the revised sound assessment for the neighborhoods around the Commerce Ave. bridge, now that the bridge will not be replaced
- Add protections, replacement assurances for the Payne Connection hardscape, landscape and art (excluding the murals).

Please enter our comments in the record.

Best,  
Jen Eamon, Pres.  
Windsor Park Neighborhood Association, Inc.

June 24, 2020

Re: INDOT North Split Project - Restorative Justice Matters

Dear Mayor Hogsett and City-County Councilors,

The North Split project has not addressed the harm caused to neighborhoods along I-70 East when the original interstate was constructed. We are disappointed that there are no plans to make pedestrian safety and quality of life improvements to the Commerce Avenue underpass, nor to increase connectivity between existing trails and transit. We request you work with INDOT to make relatively low-cost investments to help our neighborhood residents achieve equitable transportation parity and make important progress toward the city's connectivity and neighborhood safety goals. We would argue that the other neighborhoods impacted by the North Split project have had their connectivity and quality of life objectives more fully met than our neighborhoods which are more impacted.

The current physical and psychological disconnection as well as economic damage done by decades of divestment in our under-resourced neighborhoods is the devastating legacy of the original 1960s interstate construction. As a matter of restorative justice - too long in coming - safety, connectivity, health and quality of life inequities must be addressed.

The Commerce Avenue/I-70 underpass is the only connection point between Martindale- Brightwood and the Near Eastside. It also is a convenient route to downtown (that will help alleviate congestion on 16th Street.) Pedestrians and cyclists use this dark and cramped route to travel to work, the grocery store, the Spades Park Library, cultural institutions, shops, parks and eateries each day. School children walk or cycle to Arsenal Tech Campus and The Oaks Academies in Hillside and in Brookside along dangerous and unsafe sidewalks beside the traffic lane. It is important to recognize that a quarter of our neighbors do not own a car, and are not well-served by IndyGo, making improvements especially important.

The intersection of 16<sup>th</sup> and Roosevelt Avenue, which becomes Commerce Avenue as it passes south under the interstate, is a crucial connection point to the dramatic new developments planned along Roosevelt Avenue and the broad range of industrial jobs along the North Mass Corridor. What's more, East 16<sup>th</sup> Street is rapidly regaining its status as an urban "Main Street", becoming a corridor for new commercial and residential development. Maintaining connections between our neighborhoods ensures access to new and essential employment and cultural opportunities.

We are asking for healthful, multimodal access to the Monon Trail, the green spaces of O'Bannon, Spades and Brookside Parks, nearby grocery stores, and our places of work, school, and worship. We seek the ability to enjoy cultural and educational institutions such as the Circle City Industrial Complex, Ruckus, The Kan-Kan Cinema and Spades Park Library. These are necessary for overall public health, for mental and spiritual well-being, intellectual fulfillment and the overall quality of life experienced by our nearby neighbors.

Our goals are to:

- Reduce Roosevelt/Commerce Avenue to 3 lanes between 16th Street and Brookside Parkway to slow traffic and make room for wider sidewalks and safer bicycling
- Cut back the underpass slope to allow more light and an improved sense of spaciousness for pedestrians

- Construct a Commerce Avenue Connector Trail parallel and adjacent to the interstate linking to the Monon, Cultural, and Pogue's Run Trails that restores neighborhood and downtown connectivity
- Improve access to IndyGo bus routes #25, #17, #2 and the #10
- Replace and upgrade intersection and signals appropriate to safe pedestrian and bicycle crossings (given the heavy truck traffic)
- Fill in the missing sidewalk links for safe connectivity since this is the only connecting north-south passage between Rural Street and College Avenue
- Create a neighborhood gateway for Martindale Brightwood and a portal between the neighboring Near East neighborhoods

INDOT's policy states that "any disproportionate impact on an environmental justice population that cannot be eliminated in design requires INDOT to address those issues through an Environmental Process" ([https://secure.in.gov/indot/files/ES\\_EnvironmentalJusticeGuidance\\_2012.pdf](https://secure.in.gov/indot/files/ES_EnvironmentalJusticeGuidance_2012.pdf)). We believe INDOT should have done that for the North Split project since the interstate cut off neighborhood connectivity.

The citizens of our neighborhoods must be afforded the same ease of access to work, recreation and cultural activity as the other neighborhoods affected by INDOT's plans for the North Split. Lockerbie, the Old North Side and Chatham Arch, will be receiving improvements that foster their connectivity and prioritizes their well-being (safe passage or safety). This is a matter of equity and justice. Do not ignore and neglect our neighborhoods this time. Let's change history and build goodwill. Please tell INDOT to incorporate our requests.

Sincerely,

Commerce Avenue Stakeholders

Jen Eamon, President  
Windsor Park Neighborhood Association

Willie Hawkins, President  
Hillside Neighborhood Association

Ron Ransom, President  
Spades Park Neighborhood Association

Megan Robinson, President  
Old Northside Neighborhood Association

Laurie Klinger, Co-President  
Springdale Neighborhood Association

Ken Avidor, President  
Chatham Arch Neighborhood Association

Meg Storrow, Vice President  
Mass Ave Merchants Association

Gary Reiter, Board President  
Riley Area Development Corporation

Amina Pierson, Executive Director  
Martindale Brightwood CDC

Steve Meyer, President  
King Park Development Corporation

Gina Alexander, Executive Director  
Oasis Christian CDC

James Wilson, President  
One Voice

Aster Bekele, Executive Director  
Felege Hiywot Center

Barato Britt  
Edna Martin Christian Center

Julie Rhodes, Director  
Reconnecting Our Waterways - Pogue's Run  
Waterway and Healthy Connections Committees

Jesse Kharbanda, Executive Director  
Hoosier Environmental Council

Paul Knapp  
Rethink 65/70 Coalition

Glenn Blackwood, President  
Historic Urban Neighborhoods (HUNI)

Paula Brooks  
Indianapolis Environmental Equity Council

Jack Reed, Pastor  
New Bethel Missionary Baptist Church

J.D. VanValin, Pastor  
First Free Methodist Church

Kerry Dinneen, Member  
Windsor Park Homeowner

Jen Hancock, Executive Director  
FACE Low Cost Veterinary Clinic

Turner John Woodward  
Stutz Business and Arts Center  
Valley Avenue Properties, LLC

Elizabeth Gore, Chair  
Martindale Brightwood Environmental Justice  
Collaborative

Heidi Lyda, Executive Director  
LYN House

Tom Battista  
Five Points LLC

Dylan Hostetter  
Everhart Studio

Matt and Jaimie Lamping, Owners  
8th Day Distillery & Springdale Neighbors

Ed Battista  
Windsor Arts LLC

Gregg Keesling, CEO  
RecycleForce, Ltd.

Sam Sutphin  
Indianapolis Film Project and Kan-Kan Cinema

Jon Robinson, Owner  
Centerpoint Brewing

Enclosures:

Community Profiles (SAVI)

Illustrative Graphics (SKA)

Copies to:

Kia Gillette, HNTB; Runfa Shi, Indiana Department of Transportation; Jeff Bennett, City of Indianapolis; Mark Fisher, Indianapolis Chamber of Commerce; Dan Parker, City of Indianapolis Department of Public Works; Emily Mack, City of Indianapolis Department of Department of Metropolitan Development; Anna Gremling, Indianapolis Metropolitan Planning Organization; Robert Dirks, Federal Highway Administration; Roy Nunnally, Federal Highway Administration; Hon. Andre Carson, US House of Representatives; Commissioner Joe McGuinness, Indiana Department of Transportation; Megan Sims Wells, Congressperson Andre Carson's Office; Governor Eric Holcomb; Meg Purnsley, Indianapolis Historic Preservation Commission; Hon. Jean Breux, Indiana State Senate; Hon. Greg Taylor, Indiana State Senate; Hon. Robin Shackelford, Indiana State House of Representatives; Hon. Jack Sandlin, Indiana State Senate; Hon. Greg Porter, Indiana State House of Representatives; Elizabeth Poole, Environmental Protection Agency, Region 5

**Commerce Ave Underpass and INDOT Trail Connection** a link between 16th Street transit, the Monon Trail, Pogue's Run Trail and Mass Ave transit: an imperative for access to work for challenged neighborhoods impacted by original Interstate construction.



- a** INDOT Trail Connection: proposed 12' wide paved trail within INDOT ROW
- b** Existing Alley used by bicyclists and pedestrians connects to Martindale Brightwood Neighborhood
- c** Commerce Ave Underpass: convert to 3-lane for bike/ped path
- d** Commerce Trail extension to connect with Pogue's Run Trail
- e** Future dream: Relocate CSX RR to Outer Belt to eliminate public safety & traffic congestion impacts. Convert Mass Ave to landscaped boulevard.

**Commerce Ave I-70 Underpass:** an opportunity to retrofit the underpass to a pedestrian and bike friendly passage that is well lit, clean and suitable for the frequent use it would encourage between neighborhoods separated by the original Interstate construction.



**SKA** A road diet would reduce Commerce Avenue from four lanes to three lanes between 16th St. and Brookside Parkway. The underpass is currently a barrier to a trail connection between the Monon and Pogue's Run trails and bus stops on 16th and Mass Ave.



Looking north along Commerce towards I-70. The existing sidewalks are narrow and along the curb line of Commerce Avenue. We are requesting the city allow INDOT to reduce the number of vehicular lanes to three instead of four and use the left over space for a wider sidewalk that is buffered from traffic.



The existing INDOT Lift Station on the southeast side of the Commerce Ave I-70 underpass is a hazard to pedestrians and not maintained. The neighborhoods request that INDOT install a driveway apron that meets ADA requirements and control their runoff from the access drive to prevent the build-up of debris on the sidewalk.



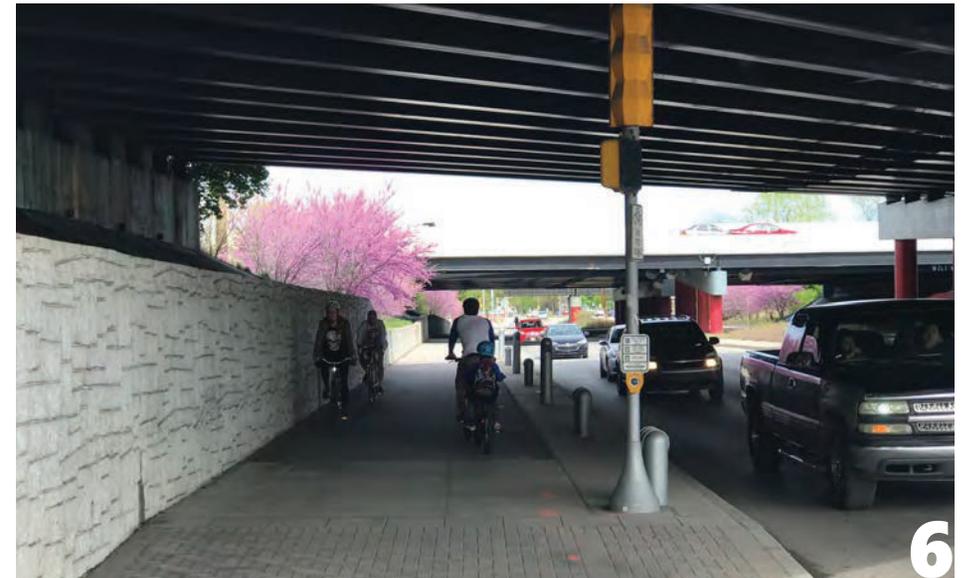
Looking south from 16th Street Intersection. Frequent truck traffic and narrow sidewalks along the existing travel lane make walking scary and challenging, especially for children. Three children were recently killed walking along Roosevelt Ave near here before it converts to Commerce Avenue.



Looking south from 16th Street Intersection. While the bridge structure was rehabilitated recently and is not being replaced, pedestrian safety measures were not provided.



Light Levels and Safety. The existing lights in the Commerce Avenue underpass do not provide balanced illumination for the sidewalk areas.



East 10th Street/Payne Connect10n. This is an example of a shared use path suitable for pedestrians and bicyclists with a buffer from traffic. The adjacent neighborhoods envision a similar treatment for Commerce Ave underpass (previous INDOT funded project as part of Hyperfix at the request of the City).



Looking east from 16th Street. An existing Alley used by bicyclists and pedestrians between Roosevelt & Valley Ave.



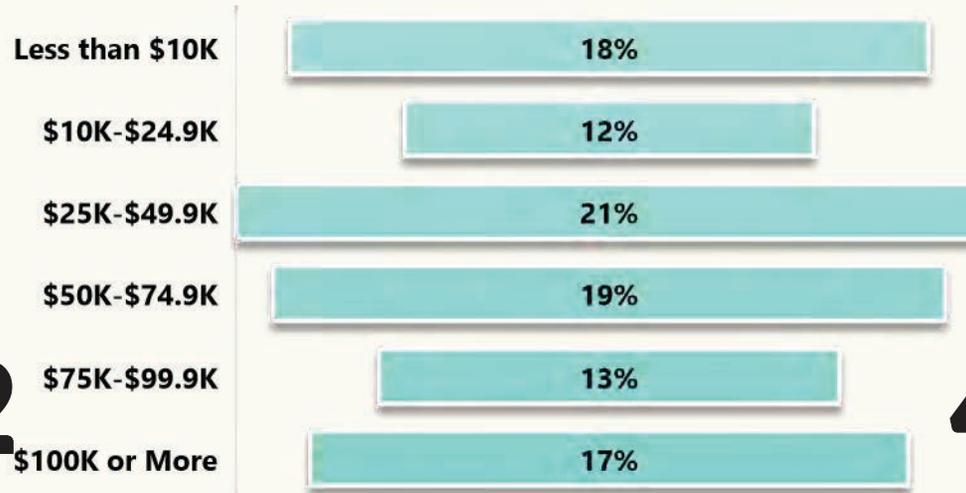
Proposed access point from Roosevelt Avenue for the INDOT connector trail that connects Commerce to the Monon Trail within INDOT right-of-way.

# COMMUNITY PROFILE

INDIANAPOLIS ENVIRONMENTAL EQUITY COUNCIL, INC.

## CHATHAM ARCH

households by income



**1,949**

households

**2,517**

population

**\$41,682**

median household income

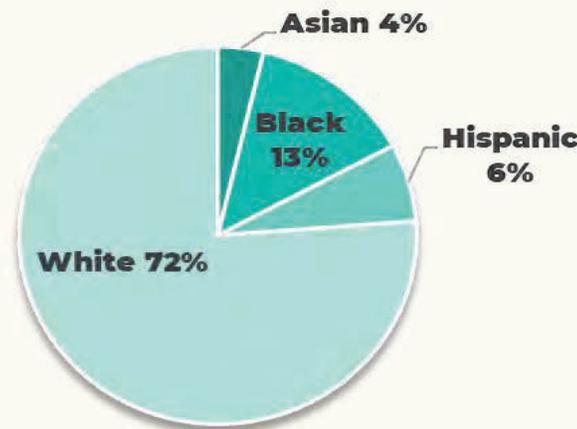
**40 years**

median age

**17%**

households without vehicles

population by race



**\$564,659**

income density (buying power)  
per capita income per acre

Source: The Polis Center, SAVI.ORG Data (2016, 2017)

June 2020

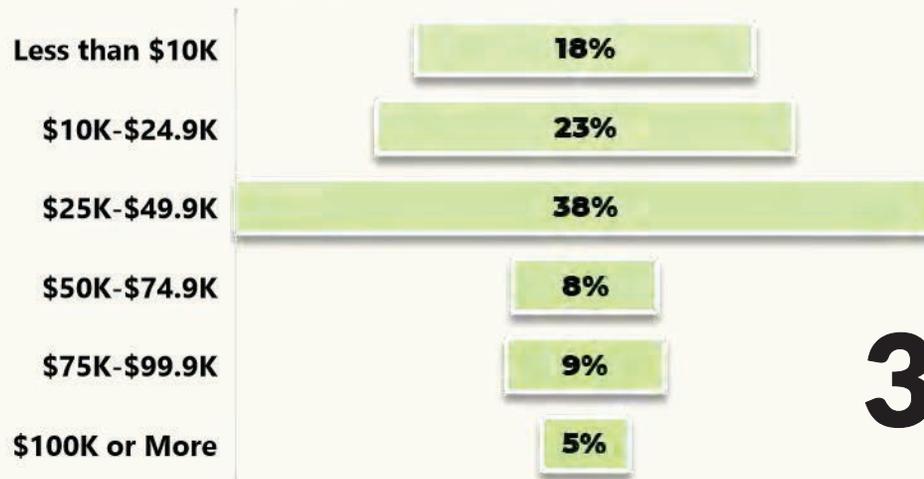
Des. Nos. 1592385 & 1600808

# COMMUNITY PROFILE

INDIANAPOLIS ENVIRONMENTAL EQUITY COUNCIL, INC.

## HILLSIDE

population by race



**672**  
households

**1,597**  
population

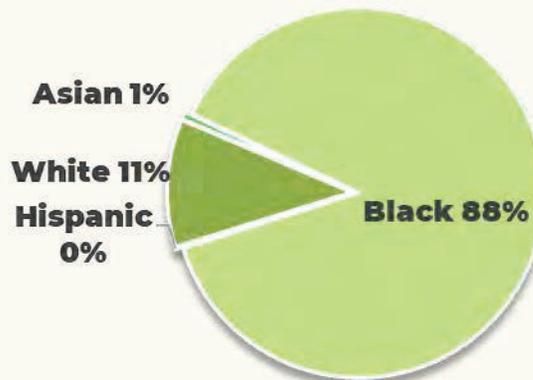
**\$28,662**  
median household income

**38 years**  
median age

households by income

**26%**  
households without vehicles

**\$40,639**  
income density (buying power)  
per capita income per acre



Source: The Polis Center, SAVI.ORG Data (2016, 2017)

June 2020

Des. Nos. 1592385 & 1600808

# COMMUNITY PROFILE

INDIANAPOLIS ENVIRONMENTAL EQUITY COUNCIL, INC.

## MARTINDALE BRIGHTWOOD

households by income



**2486**

households

**6139**

population

**\$26,819**

median household income

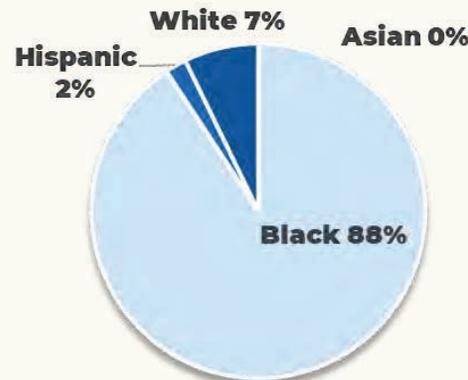
**37 years**

median age

**23%**

households without vehicles

population by race



**\$75,797**

income density (buying power)  
per capita income per acre

Source: The Polis Center, SAVI.ORG Data (2016, 2017)

June 2020

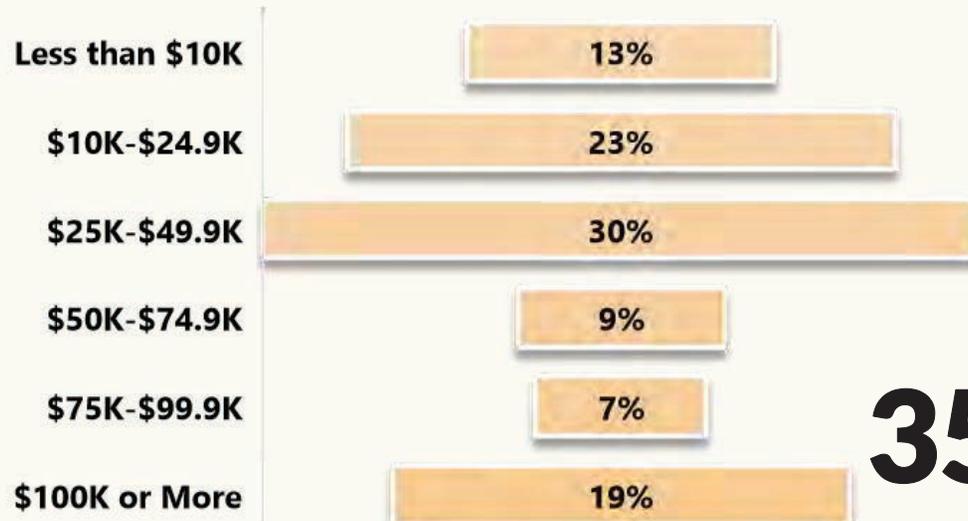
Des. Nos. 1592385 & 1600808

# COMMUNITY PROFILE

INDIANAPOLIS ENVIRONMENTAL EQUITY COUNCIL, INC.

## OLD NORTHSIDE

households by income



**942**  
households

**1,576**  
population

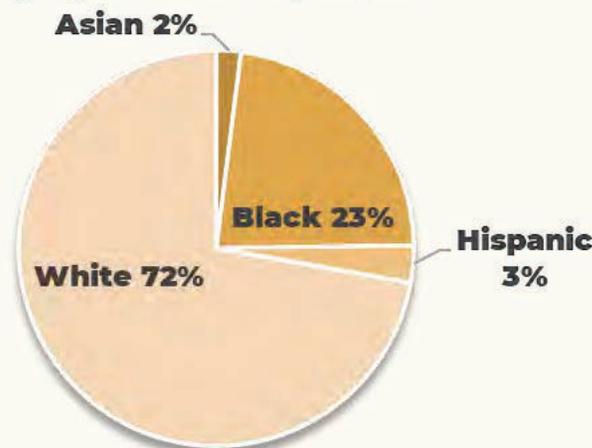
**\$42,213**  
median household income

**35 years**  
median age

**16%**  
households without vehicles

**\$617,141**  
income density (buying power)  
per capita income per acre

population by race



Source: The Polis Center, SAVI.ORG Data (2016, 2017)

June 2020

Des. Nos. 1592385 & 1600808

# COMMUNITY PROFILE

INDIANAPOLIS ENVIRONMENTAL EQUITY COUNCIL, INC.

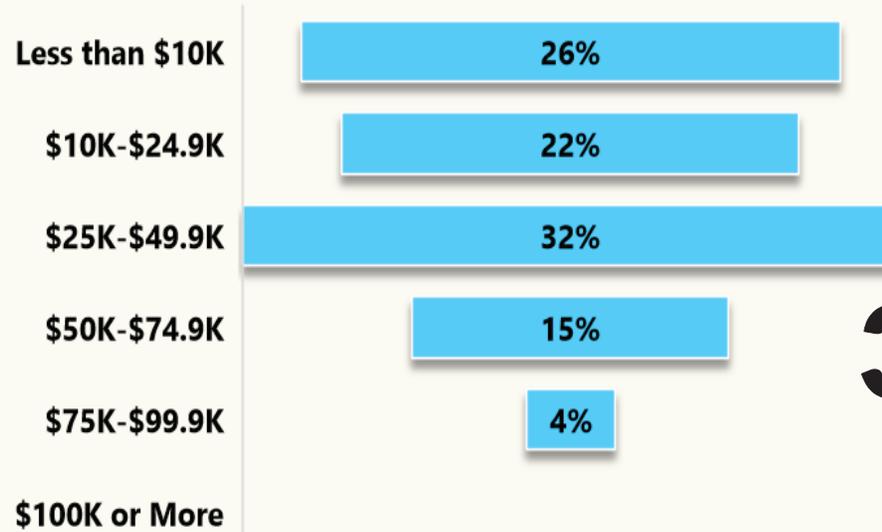
## SPADES PARK

households by income

**348**  
households

**\$27,691**  
median household income

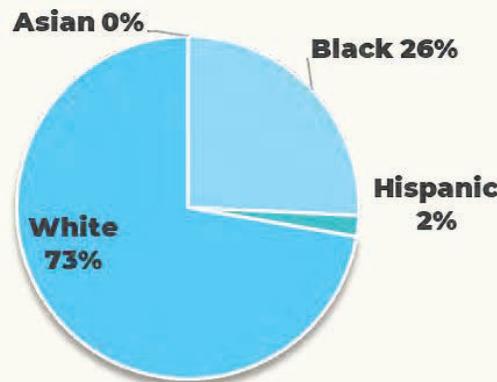
**17%**  
households without vehicles



**869**  
population

**38 years**  
median age

population by race



**\$29,771**  
income density (buying power)  
per capita income per acre

Source: The Polis Center, SAVI.ORG Data (2016, 2017)

June 2020

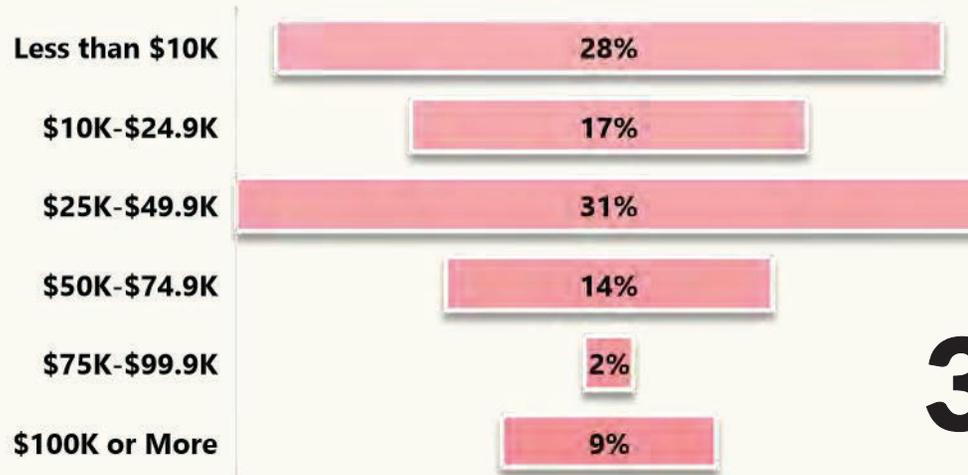
Des. Nos. 1592385 & 1600808

# COMMUNITY PROFILE

INDIANAPOLIS ENVIRONMENTAL EQUITY COUNCIL, INC.

## WINDSOR PARK

households by income



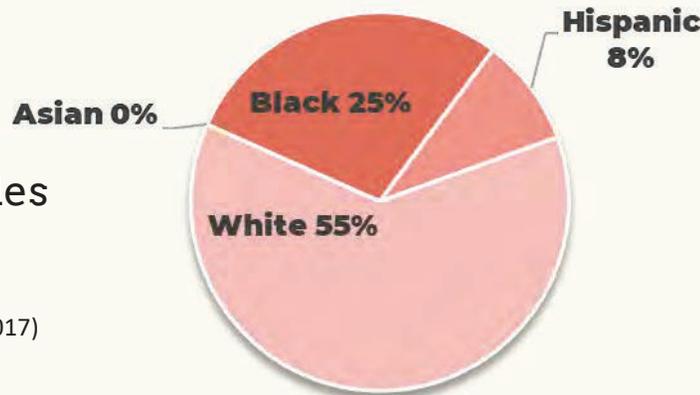
**743**  
households

**1,662**  
population

**\$29,688**  
median household income

**32 years**  
median age

population by race



**23%**  
households without vehicles

**\$138,159**  
income density (buying power)  
per capita income per acre

Source: The Polis Center, SAVI.ORG Data (2016, 2017)

June 2020

Des. Nos. 1592385 & 1600808

## Kia Gillette

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**From:** Windsor Park <wearewindsorpark@gmail.com>  
**Sent:** Friday, July 24, 2020 12:51 PM  
**To:** Kia Gillette  
**Cc:** Zach Adamson; Wells, James L.; williehawkins89@gmail.com; Paula Brooks  
**Subject:** Re: Windsor Park Neighborhood Association, Inc. response to INDOT MOU Des No. 1592385 and 1600808, North Split Interchange reconstruction

Kia-

Thank you for your reply.

Our neighborhood Board's comments and declination to sign the MOA were submitted to you on June 30th, within the MOA period, as stated in your email to the Consulting Parties. Your email to the Consulting Parties from Friday, May 8th stated:

**"INDOT provided the Revised MOA to consulting parties to see the final changes. We encourage consulting parties to sign the MOA as a Concurring Party, though this is not a requirement of Section 106. We hope parties do sign in recognition of our extended coordination process, but you are not required to do so. Recognizing the need for each party to coordinate internally, Concurring Party signatures can be accepted until the end of June."**

We feel that it is important that the MOA record itself shows any parties who were invited to sign but declined to sign and why they declined. Since you would have received the responses and comments from all parties by the end of June, can you share a list of parties, like us, who were invited but who declined and their responses?

Perhaps, there is no formal comment period allowed as a part of the MOU signature gathering? If so, that is a huge misstep. *There has to be a way to recognize parties who have made a good faith effort to remain engaged in the process but who do not agree with the plan.* There has to be a way to record their comments, prior to moving on the next phase (where we are now). Otherwise, what is the point?

The revised plan does nothing to alleviate the historic and current damage the North Split imposed on the neighborhoods who are most economically challenged and the connectivity solutions in the MOA are not equitable. The obvious lack of parity is why our neighborhood also signed on to the Letter from the Commerce Avenue Stakeholders, a group of neighborhoods and stakeholders on both sides of the North Split.

How does INDOT plan on addressing our concerns?

Best,  
 Jen Eamon  
 Pres., Windsor Park Neighborhood Assoc., Inc.

On Fri, Jul 24, 2020 at 10:57 AM Kia Gillette <[kgillette@hntb.com](mailto:kgillette@hntb.com)> wrote:

Jen,

All comments received are reviewed and considered as part of the project, but only comments received during a formal comment period are included in the formal project record. A formal response is developed when they are submitted during a formal comment period.

There is currently a formal comment period for the project from July 17 through August 17. Your comments below will be included in the formal project record for the EA and included in the Finding of No Significant Impact (FONSI) request package which will be posted to the website.

Thanks,

Kia

**Kia Gillette**

Environmental Project Manager

Email [kgillette@hntb.com](mailto:kgillette@hntb.com)

**From:** Windsor Park <[wearewindsorpark@gmail.com](mailto:wearewindsorpark@gmail.com)>

**Sent:** Thursday, July 23, 2020 12:45 PM

**To:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>

**Subject:** Re: Windsor Park Neighborhood Association, Inc. response to INDOT MOU Des No. 1592385 and 1600808, North Split Interchange reconstruction

Kia-

Was our letter, below, sent on June 30th included in INDOT's record?

For past communications, you sent an email confirming receipt and addition to the record.

I could not find our neighborhood's comments when searching the online record to review the EA report. It is possible that I just looked in the wrong place.

Please advise,

Jen Eamon

Pres., Windsor Park Neighborhood Association, Inc.

**Kia Gillette**

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**From:** Indy North Split <info@northsplit.com>  
**Sent:** Monday, July 27, 2020 9:56 AM  
**To:** Carrie Shaver  
**Cc:** Kia Gillette; NorthSplit; 'Erin Pipkin'  
**Subject:** Re:

Ms. Shaver:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will review and respond to all public comments, which will become part of the public record for the project.

Best regards,  
 Amy Hanna  
 North Split Public Involvement

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**From:** Carrie Shaver <carrie.s.shaver@gmail.com>  
**Sent:** Saturday, July 25, 2020 2:20 PM  
**To:** Indy North Split <info@northsplit.com>  
**Subject:**

IN DOT,

I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, lighting and landscaping to the Commerce Avenue underpass afforded to most of the other underpasses. To not do so is to continue the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color- and a lack of parity. We see a need for restorative justice. This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood. .

Do the right thing.

Carrie Shaver  
 1222 N Tacoma Ave 46201

**Kia Gillette**

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**From:** Indy North Split <info@northsplit.com>  
**Sent:** Monday, July 27, 2020 9:54 AM  
**To:** Ellen Annala  
**Cc:** Kia Gillette; 'Erin Pipkin'; NorthSplit  
**Subject:** Re: Look at Madrid

Ms. Annala:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will review and respond to all public comments, which will become part of the public record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

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**From:** Indy North Split <info@northsplit.com>  
**Sent:** Monday, July 27, 2020 8:30 AM  
**To:** Amy Hanna <amy.hanna@borshoff.biz>  
**Subject:** Fw: Look at Madrid

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**From:** Ellen Annala <ekannala@icloud.com>  
**Sent:** Sunday, July 26, 2020 12:29 PM  
**To:** Indy North Split <info@northsplit.com>  
**Subject:** Look at Madrid

They went underground and reduced city traffic in a wonderful way. Very impressive.

Sent from my iPad

**Kia Gillette**

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**From:** Indy North Split <info@northsplit.com>  
**Sent:** Monday, July 27, 2020 3:49 PM  
**To:** Shannon Effler  
**Cc:** Kia Gillette; NorthSplit; 'Erin Pipkin'  
**Subject:** Re: North Split lack of innovation

Ms. Effler:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will review and respond to all public comments, which will become part of the public record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

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**From:** Shannon Effler <s.d.effler@gmail.com>  
**Sent:** Monday, July 27, 2020 3:31 PM  
**To:** frank.mascari@indy.gov <frank.mascari@indy.gov>; Indy North Split <info@northsplit.com>  
**Subject:** North Split lack of innovation

I want to know why INDOT is going to tear down a section of the downtown highway, on the Northsplit all the way down to the Washington Street bridge for two years but aren't going to change or do anything innovative about it when they rebuild. Why is Indianapolis missing this opportunity?

It seems that none of the creative partnerships or innovative solutions to promote connectivity, economic development, or Quality of Life factors will be implemented. What will be the fate of the SE side when they come for the Southsplit?

Best Wishes,  
Shannon Effler, MSW  
317-985-9389

**Kia Gillette**

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**From:** Indy North Split <info@northsplit.com>  
**Sent:** Monday, July 27, 2020 4:49 PM  
**To:** jon marquess  
**Cc:** Kia Gillette; NorthSplit; 'Erin Pipkin'  
**Subject:** Re: Engineering

Mr. Marquess:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will review and respond to all public comments, which will become part of the public record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

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**From:** jon marquess <jmarkwest@sbcglobal.net>  
**Sent:** Monday, July 27, 2020 4:37 PM  
**To:** Indy North Split <info@northsplit.com>  
**Subject:** Engineering

I hope the engineers can get it right this time. I feel they have done this project once or twice already. How many millions have we spent on this interchange already. That's like they totally screwed up the 465 south to 65 south exit. It is still a traffic nightmare. I have no idea why they didn't make it a 2 lane exit ramp. Total waste of money.

**From:** [Michael Taft](#)  
**To:** [Kia Gillette](#); [Indy North Split](#)  
**Cc:** [NorthSplit](#); ["Erin Pipkin"](#)  
**Subject:** RE: North Split EA Comments  
**Date:** Wednesday, August 19, 2020 8:49:11 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image426871.png](#)

---

Appreciate you clarifying and providing the additional data, and we'd still prefer no barrier west of our property. Thanks for being responsive.

### Michael Taft

Development Associate

T: (317) 419-6216 | M: (317) 658-7301

E: [mtaft@twgdev.com](mailto:mtaft@twgdev.com)



**We've moved! Our new address is:**

**1301 East Washington Street, Ste 100 Indianapolis, IN 46202**

---

**From:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>  
**Sent:** Wednesday, August 19, 2020 8:36 AM  
**To:** Michael Taft <[mtaft@twgdev.com](mailto:mtaft@twgdev.com)>; Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>  
**Cc:** NorthSplit <[NorthSplit@HNTB.com](mailto:NorthSplit@HNTB.com)>; 'Erin Pipkin' <[erin@compassoutreachsolutions.com](mailto:erin@compassoutreachsolutions.com)>  
**Subject:** RE: North Split EA Comments

Michael,

Thank you, this is helpful. We want to make sure you have a full understanding of the noise changes of removing the barrier from the bridge structure before we move forward. Attached is a table showing the noise results with the barrier on the bridge structure and off the bridge structure as well as a map of the receptors. For several receptors (highlighted in yellow in the table), there is less of a reduction in noise when the barrier is not included on the bridge structure. Some of those may be perceptible to the human ear. Generally a 3.0 dB change is perceptible.

If we remove the barrier from the bridge structure, it is unlikely we will be able to add it back on, so we just want to make sure you are aware and ok with difference in noise levels that result from the change.

Please let me know if you are still in favor of moving forward with stopping the barrier just before the bridge over Lewis St. and the Monon Trail.

Thanks,  
Kia

**Kia Gillette**

Environmental Project Manager  
Email [kgillette@hntb.com](mailto:kgillette@hntb.com)

---

**From:** Michael Taft <[mtaft@twgdev.com](mailto:mtaft@twgdev.com)>  
**Sent:** Tuesday, August 18, 2020 2:55 PM  
**To:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>; Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>  
**Cc:** NorthSplit <[NorthSplit@HNTB.com](mailto:NorthSplit@HNTB.com)>; 'Erin Pipkin' <[erin@compassoutreachsolutions.com](mailto:erin@compassoutreachsolutions.com)>  
**Subject:** RE: North Split EA Comments

Kia,

Appreciate the followup. There were a few factors we considered:

- From an economic perspective, the viewshed between our building and the downtown skyline is really valuable to our property. There isn't really a value due south of the interchange, but to the southwest there is. I believe this was an issue Old Northside folks harped on as well.
- O'Bannon has a few features that make continuing the sound barrier less relevant:
  - It's below interstate grade and has no elevated structures, so more natural noise reduction
  - Lots of soft, sound-absorbent organic material
  - No residential or sensitive activities—just occasional recreation.
  - And technically speaking, the O'Bannon and Monon receptors were not found to be impacted by a proposed barrier. They'll both reduce in noise level organically, and I've never heard anyone comment on highway noise on the fields. So you're just adding linear feet (cost) without any significant benefit.
- And practically speaking, just makes sense to stop the barrier before the bridge has to bear any more weight on the span. There's a chance that pushes the design to a higher cost bracket.

Thanks!

**Michael Taft**

Development Associate

T: (317) 419-6216 | M: (317) 658-7301

E: [mtaft@twgdev.com](mailto:mtaft@twgdev.com)



**We've moved! Our new address is:**  
**1301 East Washington Street, Ste 100 Indianapolis, IN 46202**

---

**From:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>  
**Sent:** Tuesday, August 18, 2020 2:14 PM  
**To:** Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>; Michael Taft <[mtaft@twgdev.com](mailto:mtaft@twgdev.com)>  
**Cc:** NorthSplit <[NorthSplit@HNTB.com](mailto:NorthSplit@HNTB.com)>; 'Erin Pipkin' <[erin@compassoutreachsolutions.com](mailto:erin@compassoutreachsolutions.com)>  
**Subject:** RE: North Split EA Comments

Dear Michael,

We had a follow up question regarding your comment about sound barrier NB3W. We are investigating whether it may be possible to stop it before the bridge over Lewis Street and the Monon Trail. Did you have a reason you wanted the barrier to stop before the Monon Trail?

Thanks,  
Kia

**Kia Gillette**

Environmental Project Manager

Email [kgillette@hntb.com](mailto:kgillette@hntb.com)

---

**From:** Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>

**Sent:** Tuesday, July 28, 2020 8:49 AM

**To:** Michael Taft <[mtaft@twgdev.com](mailto:mtaft@twgdev.com)>

**Cc:** Kia Gillette <[kgillette@HNTB.com](mailto:kgillette@HNTB.com)>; NorthSplit <[NorthSplit@HNTB.com](mailto:NorthSplit@HNTB.com)>; 'Erin Pipkin' <[erin@compassoutreachsolutions.com](mailto:erin@compassoutreachsolutions.com)>

**Subject:** Re: North Split EA Comments

Mr. Taft:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response in the formal record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

---

**From:** Michael Taft <[mtaft@twgdev.com](mailto:mtaft@twgdev.com)>

**Sent:** Monday, July 27, 2020 5:37 PM

**To:** Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>

**Subject:** North Split EA Comments

Hi,

I'm writing to offer comment as a representative of a 188-unit multifamily development at 1515 Lewis St. We have three major comments:

- We were previously under the impression that there were to be significant improvements to the Monon Trail between 10<sup>th</sup> St and 15<sup>th</sup> St. This included multiple renderings in INDOT presentations of pavers, public art, and lighting. In the most recent EA, there is only a simple

commitment to increase the width from 10' to 14'. This is a disappointment and we'd like to advocate for the reintroduction of improvements to this stretch that is severely impacted by the interstate.

- We would like to emphasize that the current condition of the Lewis St underpass is extremely poor and request that this underpass will include new sidewalks. Some of the example sections are unclear and indicate the city may be responsible for that scope.
- We would like to request that sound barrier NB3W stop at Lewis St rather than continue to the Monon. As the only impacted receptor property for this section, we hope this request carries weight.

Please feel free to contact me directly for any clarifications.

Thank you,

**Michael Taft**

Development Associate

T: [\(317\) 419-6216](tel:(317)419-6216) | M: [\(317\) 658-7301](tel:(317)658-7301)

E: [mtaft@twgdev.com](mailto:mtaft@twgdev.com)



**We've moved! Our new address is:**

**1301 East Washington Street, Ste 100 Indianapolis, IN 46202**

*This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you are NOT the intended recipient and receive this communication, please delete this message and any attachments. Thank you.*

*This e-mail and any files transmitted with it are confidential and are intended solely for the use of the individual or entity to whom they are addressed. If you are NOT the intended recipient and receive this communication, please delete this message and any attachments. Thank you.*

**Kia Gillette**

---

**From:** Indy North Split <info@northsplit.com>  
**Sent:** Tuesday, July 28, 2020 9:51 AM  
**To:** Nick Gehlhausen  
**Cc:** Kia Gillette; NorthSplit; 'Erin Pipkin'  
**Subject:** Re: Roosevelt Ave/Commerce Avenue underpass upgrade

Mr. Gehlhausen:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

---

**From:** Nick Gehlhausen <gehlhausen@gmail.com>  
**Sent:** Tuesday, July 28, 2020 8:56 AM  
**To:** Indy North Split <info@northsplit.com>; kgillette@hntb.com <kgillette@hntb.com>; gregory.garrett1@indy.gov <gregory.garrett1@indy.gov>  
**Subject:** Roosevelt Ave/Commerce Avenue underpass upgrade

Good day, all,

I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, lighting and landscaping to the Commerce Avenue underpass afforded to most of the other underpasses.

You may have already received other requests for this, and I am adding my voice to the requests.

Please let me know if you have questions or need to discuss.

thank you,  
Nick Gehlhausen  
317-371-5701

## Kia Gillette

---

**From:** Indy North Split <info@northsplit.com>  
**Sent:** Thursday, July 30, 2020 1:57 PM  
**To:** Melody Baxter  
**Cc:** Preston Breunig; Kia Gillette; NorthSplit; 'Erin Pipkin'  
**Subject:** Re: Comments on I-70 and I-65

Mr. Breunig:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Best regards,  
 Amy Hanna  
 North Split Public Involvement

---

**From:** Melody Baxter <mbaxter@ptbreunig.com>  
**Sent:** Wednesday, July 29, 2020 3:18 PM  
**To:** Indy North Split <info@northsplit.com>  
**Cc:** Preston Breunig <ptb@ptbreunig.com>  
**Subject:** Comments on I-70 and I-65

This e-mail is being submitted on behalf of Preston Breunig.

I believe all semi-trucks should be prohibited from traveling through downtown on I-70 and I-65. They should be forced to use 465 as a by-pass for downtown. I would be happy to discuss this matter further if you wish to contact me. I can be reached at (317) 601-4065.

*Melody A. Baxter*  
*Office Manager*  
*Law Office of Preston T. Breunig*  
*1070 East 86<sup>th</sup> Street, Suite 72-7*  
*Indianapolis, Indiana 46240*  
*(317) 638-3333*  
[\*mbaxter@ptbreunig.com\*](mailto:mbaxter@ptbreunig.com)

## Kia Gillette

---

**From:** Indy North Split <info@northsplit.com>  
**Sent:** Monday, August 3, 2020 9:26 AM  
**To:** Kathleen Surfus  
**Cc:** NorthSplit; Kia Gillette; 'Erin Pipkin'  
**Subject:** Re: INDOT Underpass Plans: Include Roosevelt Ave/Commerce Ave underpass

Ms. Surfus:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Best regards,  
 Amy Hanna  
 North Split Public Involvement

---

**From:** Kathleen Surfus <surfus.kathleen@gmail.com>  
**Sent:** Saturday, August 1, 2020 1:43 PM  
**To:** Indy North Split <info@northsplit.com>; kgillette@hntb.com <kgillette@hntb.com>; gregory.garrett1@indy.gov <gregory.garrett1@indy.gov>  
**Subject:** INDOT Underpass Plans: Include Roosevelt Ave/Commerce Ave underpass

To Whom It May Concern,

I am a resident on the near Eastside. I urge you to include the Roosevelt Ave/Commerce Ave underpass in upcoming INDOT plans.

For most of the underpasses, there are planned upgrades that will improve pedestrian and bike access, lighting and landscaping. Unfortunately, the Roosevelt Ave/Commerce Avenue underpass, while originally under discussion to receive the same treatment, was left out of the final plan. This means that the neighborhoods that have the worst connectivity to each other and that also happen to have a higher percentage of neighbors who do not own a car, will be excluded from the basic pedestrian and bicycling upgrades planned for the North Split area.

Windsor Park neighbors find this problematic. We view INDOT's decision regarding this underpass as a continuation of the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color- and a lack of parity. We see a need for restorative justice. This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood.

Thank you,  
 Kathleen Surfus  
 (812) 322-3869  
[surfus.kathleen@gmail.com](mailto:surfus.kathleen@gmail.com)  
 Springdale Resident

**Kia Gillette**

---

**From:** Indy North Split <info@northsplit.com>  
**Sent:** Tuesday, August 4, 2020 9:57 AM  
**To:** kay surfus  
**Cc:** NorthSplit; Kia Gillette; 'Erin Pipkin'  
**Subject:** Re: Upgrade commerce street underpass

Ms. Surfus:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

---

**From:** kay surfus <kaykayrn@yahoo.com>  
**Sent:** Monday, August 3, 2020 2:58 PM  
**To:** Indy North Split <info@northsplit.com>  
**Subject:** Upgrade commerce street underpass

I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, lighting and landscaping to the Commerce Avenue underpass afforded to most of the other underpasses.

Sent from my iPhone

# COMMENTS AND QUESTIONS

NAME

PHONE (OPTIONAL)

Elizabeth Biggio

ADDRESS

2063 N. Meridian St. #3

EMAIL ADDRESS

etbiggio@gmail.com

SUBSCRIBE TO E-MAIL

(already am)

I am concerned about the lack of meaningful improvements to pedestrian traffic underneath the interstate bridges. I am also concerned the upgrades being offered will not be maintained as the underpasses are neglected now. The Monon detour is a good touch, but the desire for increased connectivity to the neighborhood needs more attention. In regard to historic properties, it is disappointing nothing can be done to mitigate the adverse effects caused by the original interstate construction other than visual shielding - the same pedestrian connectivity issues are affecting the historic districts.



877-799-6570

NorthSplit.com

info@NorthSplit.com

# COMMENTS AND QUESTIONS

NAME

BRYAN WOLFE

PHONE (OPTIONAL)

ADDRESS

2850 N Meridian St

EMAIL ADDRESS

BRYANWOLFE1@GMAIL.COM

SUBSCRIBE TO E-MAIL UPDATES

Please consider providing construction companies a monetary \$ incentive (like Hyperfix project a few years ago) to expedite their completion. This will be a major inconvenience & it would be great if they had a \$ reason to expedite construction to minimize the inconvenience. Thank you.



877-799-6570

NorthSplit.com

info@NorthSplit.com

**From:** [Erin Pipkin](#)  
**To:** [Kia Gillette](#); [Seth Schickel](#); [John W. Myers](#)  
**Cc:** [Amy Hanna](#); [Duncan, Mallory](#)  
**Subject:** Fw: Delaware Street question  
**Date:** Thursday, August 6, 2020 3:52:52 PM  
**Attachments:** [image001.png](#)  
[Modified-Downtown-Access.pdf](#)  
[North-Split-Public-Hearing-Handout.pdf](#)  
**Importance:** High

---

Please see below for a request for clarification from the Indy Star:

---

**From:** May, Ethan <emay@indystar.com>  
**Sent:** Thursday, August 6, 2020 3:37 PM  
**To:** Duncan, Mallory <MaDuncan@indot.IN.gov>; info@northsplit.com <info@northsplit.com>  
**Subject:** Delaware Street question

Good afternoon!

I'm seeing a discrepancy about changes to the Delaware Street on-ramp, and I wanted to see which was right.

The picture of the preferred alternative in Page 5 of the hearings handout says there will not be I-65 access from Delaware, but the "Modified Downtown Access" slide of the presentation from the hearings says there will be. Which is the case?

Thanks for your help!

**Ethan May**  
Multi-platform Producer | Digital Team

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Office: 317-444-4682  
Mobile: 317-402-1058

**Contact : Entry # 1913****Name**

Raymond Baker

**Email**[rbclimited@att.net](mailto:rbclimited@att.net)**Phone**

(317) 696-5527

**Message**

Please consider all of the neighbors impacted by any changes under consideration.  
Please consider changes that reach out 20 to 30 years forward.

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added July 23, 2020 at 10:20 am

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1915****Name**

Jim Brandyberry

**Email**[jbrandyberry@sbcglobal.net](mailto:jbrandyberry@sbcglobal.net)**Message**

Please do not capitulate to the voices of a few businesses who would limit the design. Do what is best for the many, not the few. Don't let the tail wag the dog!

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added July 24, 2020 at 8:17 am

WordPress successfully passed the notification email to the sending server.

**From:** [Indy North Split](#)  
**To:** [Amy Hanna](#)  
**Subject:** Fw: This is the BEST feature I have seen  
**Date:** Friday, July 24, 2020 9:46:47 AM

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---

**From:** Thomas I M Ho <Tom@drthomasho.com>  
**Sent:** Friday, July 24, 2020 9:20 AM  
**To:** Indy North Split <info@northsplit.com>  
**Subject:** This is the BEST feature I have seen

Reconfiguring the interchange so traffic on northbound I-65 and eastbound I-70 does not need to cross paths between the North Split and South Split.

Be sure to KEEP this feature!

---

**Total Control Panel**

[Login](#)

To: [amy.hanna@borshoff.biz](mailto:amy.hanna@borshoff.biz) [Remove](#) this sender from my allow list  
From: [info@northsplit.com](mailto:info@northsplit.com)

*You received this message because the sender is on your allow list.*

**Contact : Entry # 1918**

**Name**

Chris Bachle

**Email**

[cbachle@gmail.com](mailto:cbachle@gmail.com)

**Phone**

(317) 371-4062

**Message**

I've heard this brought up before in the information sessions but I also want to express my concern with the loss of the Delaware St on-ramp access to I-65 S / I-70 W.

I use this ramp every weekday morning on my way to work off of Harding St and every other car around me that uses the Delaware St ramp is taking I65 South (I don't ever really see any cars weaving over to I70 east in the morning). I suspect this is because there is no other good way to go I65 south / I70 west from the near north side other than going several miles away to Keystone, weave through the mess of streets / wait on the stoplights to use the already busy West St ramp, or travel across downtown to get to Washington St. This onramp is also an important connector to other parts of downtown (Fletcher Ave, East St, Ohio St).

I heard and get that keeping the existing access creates a safety hazard with the weave for I-70 E traffic which is heavy in the evening rush hour. I think a good alternative would be to create an on-ramp from College Ave at 11th St (or in the immediate area) onto the collector road which would then give access to I-65 S / I-70 W as well as the near east neighborhoods. The new north split interchange looks to be creating ample space to make this happen in the ROW where 11th St dead-ends (would actually just be using the land that the existing I-65 S to collector exit takes up now) or in the ROW just south of I-65 and just east of College (in between the existing commercial building and I-65 - this option could likely use most if not all of the existing I-65 S to collector road exit road bed). Creating this on-ramp also creates good and closer access to the expanding north end of Mass Ave (including the new bottleworks development).

In summary, removing this ramp's access greatly reduces access to I65 south and I70 west for a large and growing population of people that live on the near northside of downtown. The interstate cuts through this neighborhood so removing easy access to the existing full interstate options should not happen. An acceptable alternative would be to create a new on-ramp at College Ave which could adequately serve these neighborhoods as well as the north end of Mass Ave (including the new Bottleworks development).

**Notes**



**Admin Notification (ID: 5a53d8650f9f0)**

added July 25, 2020 at 11:14 pm

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1921****Name**

Kate Elmer

**Email**[Wickerkl@aol.com](mailto:Wickerkl@aol.com)**Phone**

(317) 450-9047

**Message**

Can someone explain what options those of us who currently access 65 S using the Delaware ramp will have under this plan? The remaining ways to access 65 S from downtown cannot, in my experience, handle the extra volume. When the Delaware ramp was closed last summer, alternatives quickly turned into gridlock. I cannot fathom that situation becoming permanent.

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added July 26, 2020 at 8:24 pm

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1922**

**Name**

Terri Moore

**Email**

[tmooore21854@gmail.com](mailto:tmooore21854@gmail.com)

**Phone**

(317) 397-7340

**Message**

I live off Kentucky avenue I travel everyday to 465 going north to work there's a sign says that exist will be closed August 3. 2030 doesn't say how long it will be closed I will need to find another way while that exist is closed so need to know how long they plan on closing it

**Notes**



**Admin Notification (ID: 5a53d8650f9f0)**

added July 27, 2020 at 8:29 pm

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1924**

**Name**

Douglas Pond

**Email**

[dougpond@post.harvard.edu](mailto:dougpond@post.harvard.edu)

**Phone**

(260) 413-6327

**Message**

-As a 35+-year resident and homeowner in East Lockerbie, we feel that the noise evaluation bypassed our concerns. Noise levels by trucks, can far exceed the parameters outlined in this report especially trucks without working mufflers (straight pipes) using engine braking. We have measured staccato noise levels similar to a loud lawn mower or near speakers in a rock concert.

-An expensive sound-wall (as planned) would reduce this high-decibel noise pollution BUT so would an inexpensive and expedient city-county ordinance outlawing the use of engine braking (Jake brakes) in Marion County. There is absolutely no need for using 'Jake brakes'on the flat and level roads within the county. Their main purpose is to reduce brake over-heating in the mountains for large trucks, not to be used in relatively flat population areas to irritate drivers. Many other Indiana cities, both large and small, have outlawed engine braking and it had been very successful in reducing the loudest of road noise. It is mind-boggling that this option was never considered in such an extensive and expensive environmental analysis.

-A majority of home residents (24/7 impacted) voted for a sound wall, mainly because of the constant super-loud blasts from 'Jake brakes" but our input was overridden by other interests. The voice of proximate residents was marginalized and disregarded in this environmental analysis so this issue should be revisited before construction begins.

-To solve this problem, with little expense to the taxpayer, a simple ordinance could be passed outlawing engine braking in the city and signs posted in critical areas on interstates especially entering the downtown North and South Splits. A cheap and effective way to address noise pollution from the interstates versus an expensive and intrusive sound wall in downtown Indy.

-Implementing a City-County ordinance to ban 'Jake Brakes" and u-muffled vehicles should be an integral part of the environmental mediation related the the North Split renovation.

-Respectfully submitted, Doug Pond

**Notes**



**Admin Notification (ID: 5a53d8650f9f0)**

added July 30, 2020 at 12:47 pm

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1926****Name**

Alberth Franco

**Email**[alberth.franco@gmail.com](mailto:alberth.franco@gmail.com)**Phone**

(786) 543-7645

**Message**

Hello,

First of all, I want to say thank you for such a detailed investigation of the project! It is clear to me as a resident of Indianapolis that a lot of thought has gone into this project before spending money on construction.

I have read through the proposal presentation and saw that the committee was interested in pursuing alternative 4c where a reduced lane would be used for the new highway as a compromise to fewer entrances into I65/I-70. I am wondering why 4a is not the preferred option where there is no access lanes from Pennsylvania and Delaware? The increased land area available from option 4a seems like a better option for overall environmental offset (the area could be used to plant trees to offset carbon emissions and help with the noise reduction, right?)

Alternatively, would it make sense to have an option 4d where the restricted lane is instead repurposed for an accident investigation zone?

I would be happy to continue this conversation via email.

Thank you for all your hard work.

Alberth Franco

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added July 31, 2020 at 5:13 pm

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1935****Name**

Ashley Stephen

**Email**[ashleyryan13@yahoo.com](mailto:ashleyryan13@yahoo.com)**Phone**

(765) 960-5642

**Message**

I appreciate INDOT's decision to move forward with the replacement of the current North Split. As a resident of Wayne County, I am a frequent user of the North Split and I have seen and experienced the deterioration of the roadways. (Granted, rehabilitation efforts have improved the experience, especially when compared to the utter decay of I-70 on the eastern side of the state that is being addressed, on a temporary basis, this year.) As for the proposed alternative, I find it acceptable given the spatial and financial limitations. I sincerely appreciate the elimination of the weave between the flows of through-traffic for I-65 and I-70 as that has regularly caused headaches when coming from the airport and other destinations on the southwest side of downtown. My only specific requests are that: 1) in addition to trees and other greenery in the to-be-vacant north, I would like to see some public art (like along I-70 on the south side of downtown, and 2) I would like the lane routings painted on the road surface (as along I-465 approaching I-70 on the east side). Thank you for considering my thoughts.

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added August 5, 2020 at 7:17 pm

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1939****Name**

Janice Lee

**Email**[jalee306@sbcglobal.net](mailto:jalee306@sbcglobal.net)**Phone**

(317) 538-8959

**Message**

Please email me the location on your website that I can find the 3d flyover. I am interested in seeing the new configuration. Thanks.

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added August 6, 2020 at 10:58 am

WordPress successfully passed the notification email to the sending server.

**Contact : Entry # 1938****Name**

Shirley Wiker

**Email**[shirley-wiker@att.net](mailto:shirley-wiker@att.net)**Phone**

(317) 752-0220

**Message**

I really like the plans and cant wait until the project is complete. Thank you to all involved.

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added August 6, 2020 at 10:09 am

WordPress successfully passed the notification email to the sending server.

**New submission from Contact at indynorthsplit.com**

MICHAEL GREENWELL <michaelsrecovery115@gmail.com>

Sat 8/15/2020 11:07 AM

To: info@northsplit.com <info@northsplit.com>; Erin Pipkin <erin@compassoutreachsolutions.com>

**Name**

MICHAEL GREENWELL

**Email**

[michaelsrecovery115@gmail.com](mailto:michaelsrecovery115@gmail.com)

**Phone**

(812) 927-0240

**Message**

I want to see what this is about???

## New submission from Contact at indynorthsplit.com

Aster Bekele <aster.bekele@fhcenter.org>

Sat 8/15/2020 5:26 PM

To: info@northsplit.com <info@northsplit.com>; Erin Pipkin <erin@compassoutreachsolutions.com>

### Name

Aster Bekele

### Email

[aster.bekele@fhcenter.org](mailto:aster.bekele@fhcenter.org)

### Phone

(317) 847-8976

### Message

I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, and beautification to the Commerce Avenue underpass afforded to most of the other underpasses

## I65 ramps not mentioned in presentation

Diane Phillips <diphil@sbcglobal.net>

Sun 8/16/2020 10:58 AM

To: info@northsplit.com <info@northsplit.com>

Hi,

I reviewed the project documents. Your presentation failed to mention a few things related to I65 access to/from downtown.

1. Pine St ramp access to N65. Is it open? closed? Open some of the time? You indicate the Pine St ramp to east I70 is open.
2. S I65 access to the Michigan/Ohio collector? Will traffic traveling southbound on I65 be able to use the collector to Michigan/ Ohio or is it only for I70 (I know it shows Fletcher and East St exists from the collector are closed to all traffic).

Sent by Diane Phillips

**New submission from Contact at indynorthsplit.com**

Eric Hannon &lt;ehannon12051@gmail.com&gt;

Mon 8/17/2020 6:37 AM

To: info@northsplit.com &lt;info@northsplit.com&gt;; Erin Pipkin &lt;erin@compassoutreachsolutions.com&gt;

**Name**

Eric Hannon

**Email**[ehannon12051@gmail.com](mailto:ehannon12051@gmail.com)**Phone**

(317) 965-5067

**Message**

Dear Seth and Kia,

First of all I want to thank you for your willingness to listen to the Indianapolis residents and get our input on the I65/i70 project. I appreciate the thoughtfulness and compassion that you have shown so far on the planning for this project.

I am writing to you as a downtown Indianapolis resident, who treasures the rich Indianapolis past and cares deeply about its future. I am asking you to carefully consider Rethink I65/70's Context Sensitive Solution submission. By putting a focus on building a truly unique urban interchange that speaks to who we are and celebrates our Capital City (pedestrian-friendly design that connects neighborhoods, usable space under the overpasses, improvements to our city with parks, trails, trees and infill development) the I65/I70 can benefit all of Indianapolis and surrounding areas, as well as serve the state's transportation needs.

Thank you for providing an open channel for our suggestions and for listening.

Sincerely,  
Eric

**From:** [Indy North Split](#)  
**To:** [Ross Miller](#)  
**Cc:** [NorthSplit](#); [Kia Gillette](#); ["Erin Pipkin"](#)  
**Subject:** Re: North Split I 70  
**Date:** Monday, August 17, 2020 9:31:42 AM

---

Mr. Miller:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Best regards,  
Amy Hanna  
North Split Public Involvement

---

**From:** Ross Miller <Reastcentral@outlook.com>  
**Sent:** Monday, August 17, 2020 9:26 AM  
**To:** Indy North Split <info@northsplit.com>  
**Subject:** North Split I 70

My comment concerning the Interatate 70 North Split is that the Pennsylvania off ramp and Delaware on ramp ARE Needed. Interstate 70 needs to have MORE lanes through downtown Indianapolis. I have noticed increased traffic from Shadeland to downtown Indianapolis over the last decade. More lanes and more on and off ramps are needed to quickly enter and leave downtown Indianapolis. Ross Miller

*Sent from my Verizon Motorola Smartphone*

**Contact : Entry # 1963****Name**

Rick Bailey

**Email**[rbailey@rhb.com](mailto:rbailey@rhb.com)**Phone**

(574) 210-2778

**Message**

As a DeSoto complex resident, I'm concerned about the probable increased traffic on Park Ave. While I understand this street is not on the official detour route, I expect that drivers will find Park a suitable alternative. The street currently is in disrepair and additional traffic will only serve to exacerbate the issue. Do you have plans to improve the condition of Park as part of your project?

**Notes****Admin Notification (ID: 5a53d8650f9f0)**

added 19 mins ago

WordPress successfully passed the notification email to the sending server.

**From:** [Kia Gillette](#)  
**To:** [Kia Gillette](#)  
**Subject:** FW: EA comments  
**Date:** Tuesday, August 18, 2020 10:08:13 AM

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**From:** Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>  
**Sent:** Tuesday, August 18, 2020 8:04 AM  
**To:** Eric Hoch <[hoccs1202@att.net](mailto:hoccs1202@att.net)>  
**Subject:** Re: EA comments

Dear Mr. Hoch:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Sincerely,  
Amy Hanna  
North Split Public Involvement

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**From:** Eric Hoch <[hoccs1202@att.net](mailto:hoccs1202@att.net)>  
**Sent:** Monday, August 17, 2020 10:01 AM  
**To:** Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>  
**Subject:** EA comments

Sad to see the Penn/Meridian St. exit be eliminated.

Eric Hoch  
1202 N. Pennsylvania St.

## North Split comments

james@jwmcq.com <james@jwmcq.com>

Mon 8/17/2020 11:00 AM

To: info@Northsplit.com <info@Northsplit.com>

Good Morning

In a brief survey of recently completed highway/pedestrian bridges, both in the US and across the world, one can quickly find many elegant examples of structures in which form is beautifully integrated in the whole.

Millau Viaduct, France

Genoa Bridge-Italy by Renzo Piano,

[Whittier Bridge\\_USA](#)

[Lesner Bridge-USA](#)

[41st Street Pedestrian Bridge-Chicago](#)

Ponte Segunda Circular-Portugal

Webb Bridge-Melbourne, Australia

By contrast, the current aesthetic treatments for the underpass structures on the North Split give the impression of hastily applied afterthoughts-employed to “dress up” an otherwise standard set of INDOT bridge components.

The appearance is cosmetic in the purest sense, it has little to do with structure, or any sense of place. It seems to recall entry features to a suburban mall development.

Assuming these improvements will be around for the next half century, why not elevate the design level for something truly outstanding, at least at select locations.

Your grandkids will thank you.

Regards



Delma Williams

(317) 354-6790

Saturday, August 15, 2020, 11:15 a.m.

Yes. I am calling concerning the underpass at Commerce Avenue and Alabama Avenue. My concern is that these underpasses be upgraded to the same standard and level as the upgrade to the other bridges that are being rebuilt for the North Split. My area is Martindale-Brightwood. We have been left out too long. I thank you for your consideration. Have a great day.

Ross Miller

(317) 586-0028

Monday, August 17, 2020, 9:30 a.m.

My comment concerning the North Split is that the on ramp from Delaware needs to be there and the off ramp for Pennsylvania Avenue needs to remain. I would like to see more lanes from Shadeland all the way through downtown Indianapolis on I-70 to handle the extra traffic that I've seen the last decade. Thank you.

Jacklyn McMillan Gunn

(317) 696-4968

Monday, August 17, 2020, 10:48 a.m.

Good morning. My name is Jacklyn McMillan Gunn and I'm calling to request that the Commerce and the Alabama be upgraded to the same level as the other bridges that will be reconstructed through the rebuilding of the North Split. Thank you.

**From:** [Indy North Split](#)  
**To:** [Alan Rider](#)  
**Cc:** [NorthSplit](#); [Kia Gillette](#); ["Erin Pipkin"](#)  
**Subject:** Re: EA comments  
**Date:** Tuesday, August 18, 2020 8:03:53 AM

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Dear Mr. Rider:

Thank you for taking the time to share your feedback. At the end of the North Split Environmental Assessment (EA) formal comment period, INDOT will record each comment along with an INDOT response, in the formal record for the project.

Sincerely,  
 Amy Hanna  
 North Split Public Involvement

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**From:** Alan Rider <[the\\_riders@hotmail.com](mailto:the_riders@hotmail.com)>  
**Sent:** Monday, August 17, 2020 2:14 PM  
**To:** Indy North Split <[info@northsplit.com](mailto:info@northsplit.com)>  
**Subject:** EA comments

Here's a comment on the North Split plans that I read about in this morning's IndySTAR... I learned this morning that in the current plan the Penna Street exit will only be available to traffic from the south, no longer to I-70 traffic from the east. I agree that the weave pattern that we have now is dangerous and should be ameliorated. But eliminating access of westbound I-70 traffic to Penna St is a mistake.

Not all who exit to Penna St go south into downtown. Those of us who live on the Near North and Mapleton etc, use that exit all the time; but we loop around under the freeway (usually with no need to completely stop...) and then take Delaware northbound to get home. It's quick and efficient...

I do that every day. So do lots of others...

With this new traffic pattern, we would have to exit either at Rural or into the middle of downtown instead, increasing congestion thru the Mass Ave district either way we go.

Is there a solution to that...??

Al Rider  
 765-350-0030  
[Alanjrider@gmail.com](mailto:Alanjrider@gmail.com)

Sent from my T-Mobile 4G LTE Device

Caller ID: (317) 690-2500  
August 17, 2020, 9:31 p.m.

I wish we had been able to take it further and buried the roads. We will still have the interstate dividing our city. ???

## Maps

Bob <bhs103@gmail.com>

Mon 8/3/2020 5:21 PM

To: info@northsplit.com <info@northsplit.com>

The map on your website is very hard to read. Could you please provide maps that are more legible.

Thanks.

Robert Sannes

Table 2 Responses to Comments from EA Comment Period (July 17 – August 17, 2020)

(CA=Member of the Community Advisory Committee, PI=Public Individual)

Comment ID	Sub	Last Name	First Name	Agency/ Organization	Date Received	Comment	Response
<b>Resource Agency</b>							
A001	01	Turnbow	Alisha	IDEM, Drinking Water Branch, Groundwater Section	8/6/20	Find attached to this email a response to your proximity request for Des. Nos. 1592385 & 1600808. Note that the site is not located in a wellhead protection area though it is located within 2000 feet of a wellhead protection area and the interstate does run through a wellhead protection area so construction traffic might travel through the wellhead protection area for Citizens Water Indianapolis. The contact for Citizens Water is John Havard and he can be reached at <a href="mailto:jhavard@citizensenergygroup.com">jhavard@citizensenergygroup.com</a> or (317) 693-8716. I have Copied John Havard from Citizens Water Indianapolis in case you would like to coordinate with them for the construction portion of this project for routing traffic. Let me know what questions you have.	This information will be provided to INDOT's construction team for consideration of haul routes.
A001	02	Turnbow	Alisha	IDEM, Drinking Water Branch, Groundwater Section	8/6/20	Upon review of the above referenced project site, it has been determined that the proposed project area <b>is not located within</b> a Wellhead Protection Area. The information is accurate to the best of our knowledge; however, there are in some cases a few factors that could impact the accuracy of this determination. Some Wellhead Protection Area Delineations have not been submitted, and many have not been approved by this office. In these cases we use a 3,000 foot fixed radius buffer to make the proximity determination. To find the status of a Public Water Supply System's (PWSS's) Wellhead Protection Area Delineation please visit our tracking database at <a href="http://www.in.gov/idem/cleanwater/2456.htm">http://www.in.gov/idem/cleanwater/2456.htm</a> and scroll to the bottom of the page.	The Drinking Water Resources section on page 29 of the EA correctly identifies the project as not located within a wellhead protection area

						<p>The project area <b>is not located within</b> a Source Water Assessment Area for a PWSS's surface water intake. The Source Water Assessment Area relates to the surface water drainage area that water could potentially flow and influence water quality for a PWSS's source of drinking water.</p> <p>Note: the Drinking Water Branch has a self service feature which allows one to determine wellhead proximity without submitting the application form. Use the following instructions:</p> <ol style="list-style-type: none"> <li>1. Go to <a href="https://www.in.gov/idem/cleanwater/pages/wellhead/">https://www.in.gov/idem/cleanwater/pages/wellhead/</a></li> <li>2. Use the search tool located in the upper left hand corner of the application to zoom to your site of interest by way of city, county, or address; or use the mouse to click on the site of interest displayed on the map.</li> <li>3. Once the site of interest has been located and selected, use the print tool to create a .pdf of a wellhead protection area proximity determination response.</li> </ol> <p>In the future please consider using this self service feature if it suits your needs.</p> <p>If you have any additional questions please feel free to contact me at the address above or at (317) 233-9158 and aturnbow@idem.in.gov.</p>	
A002	01	McWilliams-Munson	Robin	USFWS	8/10/20	<p>Thank you for providing the Environmental Assessment for our review. These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, and the U. S. Fish and Wildlife Service's Mitigation Policy.</p> <p>The area is within the range of the Indiana bat (<i>Myotis sodalis</i>) and the northern long-eared</p>	<p>The Threatened or Endangered Species section of the EA starting on page 28 of the EA discusses impacts to the Indiana bat and northern long-eared bat and is consistent with this comment. No further action required.</p>

						<p>bat (<i>Myotis septentrionalis</i>). Both of these species are covered by the 2016 Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana Bat and Northern Long-Eared Bat (updated 2018) and a No Effect determination has been made by the Federal Highway Administration for this project (IPAC determination key accessed September 16, 2019). The project is in an urban area and consists of interstate right of way and various residential and commercial land uses; impacts to suitable bat habitat are not anticipated.</p> <p>Based on a review of the information you provided, the U.S. Fish and Wildlife Service has no objections to the project as currently proposed. We support the use of native trees for all revegetation work, downward facing lighting that minimizes blue light, storm water treatment prior to entering receiving streams, along with the other environmental commitments that have been made. This precludes the need for further consultation on this project as required under Section 7 of the Endangered Species Act of 1973, as amended. However, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinitiate consultation.</p> <p>We appreciate the opportunity to comment at this early stage of project planning. If you have any questions about our recommendations, please contact robin_mcwilliams@fws.gov.</p>	
<b>A003</b>	01	Stanifer	Christie	IDNR	8/14/20	Formal approval by the Department of Natural Resources under the regulatory programs administered by the Division of Water is not required for this project.	Comment noted. No response required.
<b>A003</b>	02	Stanifer	Christie	IDNR	8/14/20	The Natural Heritage Program's data have been checked. The state endangered Kirtland's snake ( <i>Clonophis kirtlandii</i> ) has been documented within 1/2 mile southwest of the project area.	Silt fence will be installed and maintained around construction areas where ground disturbance will occur. This is included as a commitment in the EA under Section J – Commitments.

						<p>The Kirtland's snake records are in highly developed areas. One record is over 30 years old, and the other is in an area where the snakes were collected and relocated to avoid impacts to them due to other development in the area. This species was not found during a previous site visit by the DNR's herpetologist; however, these snakes could still be in the area. To minimize impacts to this species, we recommend installing a silt fence around any construction areas where ground disturbance will occur.</p>	
A003	03	Stanifer	Christie	IDNR	8/14/20	<p>Based on information provided for review as well as information presented at the Resource Agency Meetings held on November 3, 2017, and April 30, 2020, the Division of Fish and Wildlife (DFW) concurs that existing habitat features within the project area are likely low quality features related to existing infrastructure (roadside ditches, medians, etc.). However, the DFW would like to highlight the following issues as areas for potential improvement of existing conditions to reduce negative impacts to fish, wildlife, and/or botanical resources and the habitat in an urban environment:</p> <p>1) Revegetation: The DFW recommends coordination with the CORRIDORS program. CORRIDORS (Conservation On Rivers and Roadways Intended to Develop Opportunities for Resources and Species) is a DFW program to develop habitats for grassland-dependent species and to foster improved pollinator habitat along roadways and waterways. Program partners include the Indiana Department of Transportation (INDOT), USDA Natural Resources Conservation Service (NRCS), Pheasants Forever and Quail Forever. See <a href="https://www.in.gov/dnr/fishwild/9405.htm">https://www.in.gov/dnr/fishwild/9405.htm</a> for more information in this program.</p>	<p>The North Split Project landscape design will primarily include native species; however, to allow flexibility for design and supply options the use of all native species is not required. For this reason, the CORRIDORS program was not contacted for the project.</p> <p>The proposed landscape palette includes a range of treatments that focus primarily on native plant selections of the Midwest and Eastern Regions of North America. Along with straight, native species, the palette references the use of cultivars of native plants, also known as nativars, as well as plant hybrids.</p> <p>Nativars are used in place of the straight species when site conditions require plants that meet certain criteria like smaller growth and more compact form. For example, the screen utilizes nativars such as the Slender Silhouette Sweetgum (<i>Liquidambar styraciflua</i> 'Slender Silhouette'), Green Pillar Pin Oak (<i>Quercus palustris</i> 'Green Pillar'), and Burkii Eastern Red Cedar (<i>Juniperus virginiana</i> 'Burkii'), which are narrower and more upright for the narrow embankment space along the sound barrier walls. Grey Owl Juniper (<i>Juniperus virginiana</i> 'Grey Owl') is referenced for its low, spreading, shrub-like growth versus the straight species (<i>Eastern Red Cedar</i>, <i>Juniperus virginiana</i>) that is an upright, tree form.</p> <p>Hybrids are used in the same manner as nativars, where they offer characteristics that the straight species do not. For example, <i>Amelanchier</i> x</p>

							<p>grandiflora is a cross of two North American serviceberry species (<i>Amelanchier arborea</i> and <i>Amelanchier laevis</i>) that offers showier fall color.</p> <p>The decision to use some natives and hybrids over straight species is also influenced by commercial availability and their increased tolerance for the urban conditions.</p> <p>An example of a non-North American native that is included in the palette is the Upright European Hornbeam (<i>Carpinus betulus</i> 'Fastigiata'). This particular plant was chosen for its compact, upright habit, which would perform well in the narrow embankments along the sound barrier walls.</p> <p>Final plant choices – straight species versus natives versus hybrids – will lie with the landscape architect crafting the detailed planting design.</p>
A003	04	Stanifer	Christie	IDNR	8/14/20	<p>2) Urban Tree Loss: Over 5 acres of urban tree loss is expected as part of the project. Expansive tree planting is proposed as part of the project. However, there were a number of non-native species, horticultural varieties, and hybrid cultivars that are proposed. The DFW recommends avoiding removing urban trees to the greatest extent possible and replacing trees that must be removed. Street trees are important to fish and wildlife resources in urban areas. Indiana's street trees also provide millions of dollars of tangible benefits to Indiana communities by their presence in the urban environment. Their shade and beauty contribute to the quality of life. They provide significant increases in real estate values, create attractive settings for commercial businesses, and improve community neighborhood appeal. Trees decrease energy consumption by providing shade and acting as windbreaks. They reduce water treatment costs and impede soil erosion by slowing the runoff of stormwater. Trees also cool the air temperature, cleanse pollutants from the air, and produce oxygen while absorbing</p>	<p>In addition to planting hundreds of new trees within project limits, existing trees are preserved wherever feasible in "Do Not Disturb" areas. These areas will be fenced and protected throughout the construction period.</p> <p>See response to comment A003-03 regarding straight species versus natives versus hybrids.</p>

						carbon dioxide. Trees are an integral component of the urban environment. Proactively managing and maintaining a street tree population will ultimately maximize the benefits afforded by their aesthetic and ecological functions. The following links give a good overview of the benefits of a street tree program and how to select the right species to avoid the negative impacts of non-native invasive species such as the common and popular Bradford pear: <a href="https://www.in.gov/dnr/forestry/3605.htm">https://www.in.gov/dnr/forestry/3605.htm</a> > Community & Urban Forestry > Tree Species Lists.	
A003	05	Stanifer	Christie	IDNR	8/14/20	<p>3) Lighting:  The need for new lighting along the reconstructed I-65 / I-70 North Split interchange was mentioned during the Resource Agency Meetings. Most transportation corridor designers and municipalities are trending toward LED lighting. Certain types of LED lighting can have negative impacts on both human and wildlife health and safety. Scientific evidence suggests that artificial light at night has negative and deadly effects on many organisms including amphibians, birds, mammals, insects and plants (see <a href="https://www.darksky.org/light-pollution/wildlife/">https://www.darksky.org/light-pollution/wildlife/</a>). A June 2016 American Medical Association (AMA) report, "Human and Environmental Effects of Light Emitting Diode Community Lighting," concluded that "white LED street lighting patterns may contribute to the risk of chronic disease in the populations of cities in which they have been installed."</p> <p>The International Dark-Sky Association has developed recommendations for communities choosing LED lighting systems that will aid in the selection of lighting that is energy and cost efficient, yet ensures safety and security, protects wildlife, and promotes the goal of reducing light pollution. See <a href="https://www.darksky.org/our-work/lighting/lighting-for-citizens/led-guide/">https://www.darksky.org/our-work/lighting/lighting-for-citizens/led-guide/</a>.</p>	<p>The aesthetic design guidelines specify LED as the style of light. Specific hue or color of lighting is not specified.</p> <p>INDOT's construction team is required to limit light trespass outside of the right of way by shields, lighting distribution selection or other means. The construction team will identify all residential areas at the outset of the photometric modelling process to measure light trespass.</p>

A003	06	Stanifer	Christie	IDNR	8/14/20	<p>4) Storm Water Management:  Storm water management was mentioned as an issue of concern based on information provided for review as well as information presented at the Resource Agency Meeting. The DFW recommends considering a more sustainable approach to stormwater management. The traditional model of stormwater management aims to drain urban runoff as quickly as possible with the help of channels and pipes, which increases peak flows and costs of stormwater management. This type of solution only transfers flood problems from one section of the basin to another section. A more sustainable approach aims to rebuild the natural water cycle by using storage techniques (retention basins, constructed wetlands, raingardens, etc.), recharging groundwater using infiltration techniques (infiltration basins or trenches, pervious pavement, etc.), and reusing runoff for irrigation elsewhere in the basin. The following links give a good overview of traditional and sustainable stormwater management systems and their pros and cons for consideration during the design of the proposed project:  <a href="https://www.epa.gov/greeningepa/epa-facility-stormwater-management">https://www.epa.gov/greeningepa/epa-facility-stormwater-management</a>;  <a href="https://www.epa.gov/greeningepa/stormwater-management-practices-epa-facilities">https://www.epa.gov/greeningepa/stormwater-management-practices-epa-facilities</a>.</p>	<p>The project must comply with the City of Indianapolis Storm Water Design and Construction Manual including Chapter 700 for post-construction water quality requirements.</p>
A003	07	Stanifer	Christie	IDNR	8/14/20	<p>The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:</p> <ol style="list-style-type: none"> <li>1. Revegetate all bare and disturbed areas that are not currently mowed and maintained with a mixture of grasses, sedges, and wildflowers native to Central Indiana as soon as possible upon completion; turf-type grasses (including low-endophyte, friendly endophyte, and endophyte free tall fescue but excluding all other varieties of</li> </ol>	<p>All disturbed areas will be planted with a combination of trees, shrubs, and herbaceous vegetation in accordance with the Aesthetic Design Guidelines.</p>

						tall fescue) may be used in currently mowed areas only.	
<b>A003</b>	08	Stanifer	Christie	IDNR	8/14/20	2. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the stream or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.	Erosion and sediment control measures will be installed and remain in place until disturbed areas are stabilized with new vegetation.
<b>A003</b>	09	Stanifer	Christie	IDNR	8/14/20	3. Seed and protect all disturbed streambanks and slopes not protected by other methods that are 3:1 or steeper with erosion control blankets that are heavy-duty, biodegradable, and net free or that use loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.	All disturbed areas will be planted with a combination of trees, shrubs, and herbaceous vegetation in accordance with the Aesthetic Design Guidelines.
<b>A004</b>	01	Westlake	Kenneth	USEPA	8/14/20	<p>The U.S. Environmental Protection Agency (EPA) has reviewed the Environmental Assessment (EA), dated July 9, 2020, for the referenced North Split Interchange Project (North Split Project). We are providing comments pursuant to our authorities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.</p> <p>The purpose of the North Split Project is to rehabilitate and improve the existing interstate facilities leading to and through the I-65/I-70 North Split interchange in downtown Indianapolis. The project is proposed in order to correct deteriorating bridge and pavement conditions, improve safety and enhance interchange operations. The EA assesses impacts associated with the Alternative 4C; the preliminary preferred alternative identified in the North Split Interchange Project Alternatives Screening Report (9/12/2018). Alternative 4C does not include additional travel lanes. No relocations are expected. All construction</p>	Comment noted. No response required.

						takes place within existing rights-of-way. Construction of the project is expected to last for two years. When completed, the project is expected to provide reduced congestion and improvement in levels of service into 2041.	
A004	02	Westlake	Kenneth	USEPA	8/14/20	The EPA recognizes the importance of rehabilitating and improving existing infrastructure while assuring environmental and public health protection. We appreciated the opportunity for early engagement in the environmental review process. EPA provided early coordination comments regarding the environmental analysis for the proposed North Split Project (EPA letter dated 11/20/2017). We commented on the Alternatives Screening Report (EPA letter dated 10/24/2018) and participated in the four Resource Agency Meetings (via webinar/conference calls on 11/03/2017, 5/22/2018, 10/17/2018 and 4/30/2020).	Comment noted. No response required.
A004	03	Westlake	Kenneth	USEPA	8/14/20	The EA documentation does a good job of identifying impacts and capturing the concerns of resource agencies, the public, and the neighborhoods and environmental justice populations nearest to the project area. Section J – ENVIRONMENTAL COMMITMENTS list sixty (60) “Firm” commitments and nine (9) commitments for “For Further Consideration”.  EPA notes that INDOT will give, in part, further consideration to: 1) strategies to reduce diesel emissions, such as project construction/demolition contracts that require the use of equipment with clean diesel engines and the use of clean diesel fuels; 2) the use of energy efficient lighting, including solar powered lights; 3) the incorporation of native saplings and shrubs into the landscape plan for the right-of-way, to help reduce noise and maintain air quality for nearby residences and trail users; and 4) the incorporation of more sustainable approaches to stormwater management, such as retention basins, constructed wetlands, and	Comment noted. No response required.

						raingardens and the use of runoff for irrigation elsewhere in the watershed.	
<b>A004</b>	04	Westlake	Kenneth	USEPA	8/14/20	Recommendations: - EPA continues to recommend the project be designed and constructed, if feasible, to capture and treat roadway stormwater runoff and hazardous materials spills prior to discharging to Waters of the U.S.	No water will discharge from the project directly into a waterway. All stormwater will be captured into a closed storm sewer system. The project must comply with the City of Indianapolis Storm Water Design and Construction Manual including Chapter 700 for post-construction water quality requirements.
<b>A004</b>	05	Westlake	Kenneth	USEPA	8/14/20	- Establish construction materials hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents.	Construction materials deliveries will be limited to access from the interstate and will not be made from local roads.
<b>A004</b>	06	Westlake	Kenneth	USEPA	8/14/20	In addition, we note the extensive public involvement and outreach efforts made to date to engage, consider, and document input from the public, including the environmental justice communities. The EA, Appendix-K, Environmental Justice Technical Memorandum (224 pages) documents this effort and identifies potential avoidance, minimization and mitigation measures (Table 6: Environmental Justice Effects Summary). EPA supports continued community engagement through project completion.	Comment noted. No response required.
<b>Community Advisory Committee</b>							
<b>CA001</b>	01	Godley	Mark	Saint Joseph Historic Neighborhood Association	7/30/20	What I wanted to ask you was whether or not the Delaware St ramp onto I65 will actually be rebuilt, including the infrastructure underneath it (i.e., concrete sloping embankment). I know modifications will affect this ramp so I was wondering whether it will be entirely rebuilt (understanding that the I65 bridge over Alabama St. will not be rebuilt).	The Delaware ramp will not be completely rebuilt at Alabama Street. It will be widened to the south and the substructure including the bridge piers and concrete slope on the east side of Alabama Street will be widened.

CA002	01	Godley	Mark	Saint Joseph Historic Neighborhood Association	8/14/20	<p>On behalf of St. Joseph’s Historic Neighborhood Association we appreciate the opportunity to provide input regarding the Northsplit Environmental Assessment. My comments below focus on plans outlined regarding the Alabama St underpass. We understand that Northsplit reconstruction work essentially ends at the east end of the Alabama St bridge that divides St Joseph Historic Neighborhood from the Old Northside Neighborhood. We also understand that additional modifications will be made to the Delaware St ramp to I65 which is coterminous with I65 extending from Delaware St to Alabama St. The Delaware ramp is in St Joseph and also forms part of the Alabama St. overpass along with I65.</p> <p>In listening to the July 27, 2020 EA presentation we learned that Alabama St overpass will remain intact but that a few enhancements will be made to underpass area. Those enhancements include improved lighting under the Delaware St ramp and I65 bridge as they cross Alabama St. This is important as the present lights work only occasionally. We also understand there are plans to replace existing sidewalk with pavers. This will be a welcomed upgrade and enhance the appearance of the underpass along both sides of Alabama St. We are concerned, however, that their appearance will soon look shabby and unkempt because of the runoff from rain which allows debris (concrete particles, stones, and dirt) to travel down the concrete sloped abutment (east side of Alabama). This results in a muddy mess that hardens and becomes difficult to remove. We urge INDOT to remedy this when making the above described improvements.</p>	<p>These bridges will be widened and new bridge drains will be constructed. These drains will improve stormwater drainage and reduce debris collection below the bridge. No structural work is planned for the existing spill slope under the Alabama Street bridge other than the required widening.</p>
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CA002	02	Godley	Mark	Saint Joseph Historic Neighborhood Association	8/14/20	<p>About two years ago INDOT began the process of painting the underside steel support beams of the bridge green. This was done over Alabama St. and we strongly urge INDOT to finish this work as refreshed paint will contribute to the maintenance of the steel beams and further improve the environment under the bridge making it more appealing for the hundreds of pedestrians and bicyclists who pass under it each day. We also urge sound deadening material be installed immediately under the bridge. The decibel level is extraordinarily high under the bridge making it both a direct and indirect safety hazard for pedestrians and bicyclists.</p>	<p>Only new beam lines for required bridge widening will be painted as part of this project.</p> <p>INDOT did not investigate sound deadening materials for the Alabama Street bridge. Since that bridge is not being replaced, INDOT applied typical rehabilitation measures, but also included additional enhancements as part of the environmental commitments---new lighting and replacement of pedestrian pavement to match similar features in the rest of the project.</p>
CA002	03	Godley	Mark	Saint Joseph Historic Neighborhood Association	8/14/20	<p>We appreciate the discussions we have had with you, Kia and Ron Brown regarding the sloped abutments. As we have discussed, on both the east and west side of Alabama St under the Delaware ramp homeless encampments crop up and have been present for over two years. The collection of debris is astounding and while I believe INDOT has plans to remove the debris – that is only a temporary solution. Although posting signs and fencing have been attempted these are not effective solutions. We urge INDOT to provide treatments to these sloped abutments that prevent the possibility of encampments.</p>	<p>As noted in the response to Comment CA002-01, the Alabama Street bridge will not be replaced and the existing slope wall under the bridge will remain.</p> <p>INDOT is currently developing guidance for addressing homeless individuals and their property encountered in and along INDOT’s right-of-way as safely and compassionately as possible. As part of its pilot effort, INDOT is collaborating in Marion County/Greater Indianapolis Area with Horizon House, to engage community resources in relocating and meeting immediate needs of homeless persons to be relocated from within INDOT right-of-way. Processes to be used will comply with The Indianapolis Encampment Ordinance, which is applicable to encampments located on public lands in Indianapolis/Marion County.</p> <p>INDOT will notify Horizon House if they need to clear or close a homeless encampment on their property. the Horizon House Outreach Team will provide appropriate engagement, assessment, linkage to shelter, case management, medical and mental health care, and substance abuse treatment. These supportive services are made available with the goal of transitioning individuals from the street into a situation that best meets their specific needs, including permanent housing placement. Upon</p>

							<p>official notice by INDOT and/or the Indiana State Police to the encampment, the Horizon House Outreach Team will provide supportive services to individuals in the encampment with the goal of assisting them in complying with the order to relocate. The Outreach Professional will work in conjunction with INDOT, public safety staff and other outreach teams as necessary to facilitate and support relocation efforts.</p> <p>For concerns about a homeless encampment within INDOT right-of-way, please contact INDOT's customer service line at 855-INDOT4U (855-463-6848).</p>
CA002	04	Godley	Mark	Saint Joseph Historic Neighborhood Association	8/14/20	<p>We also understand from previous discussions with you and others that INDOT may provide resources for neighborhood signs. I think we agree that signs on the bridges may not be the best way to accomplish this given they would either be marking the neighborhood as one is leaving it or marking it while in a different neighborhood. Instead we encourage dialogue with St. Joseph representatives and Old Northside representatives to collaborate on neighborhood banners or signs.</p>	<p>There will be coordination with the St. Joseph and Old Northside neighborhood representatives regarding their established logos and sign standards.</p> <p>The Section 106 MOA includes the following commitment:</p> <p>"To improve connectivity between adversely affected historic districts, INDOT shall make the following connectivity improvements:</p> <p>a) Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Alabama Street underpass shall include new lighting on the bridge, sidewalk pavers, and signage along Alabama Street identifying each neighborhood. Coordination shall occur with the Old Northside and Saint Joseph neighborhoods regarding their established logos and sign standards."</p>
<b>Public Individuals</b>							
PI001	01	May	Ethan	Public	7/22/20	<p>I read through this report yesterday, and I had a few questions:</p> <ol style="list-style-type: none"> <li>1. After these public hearings, what's the next stop for this project?</li> <li>2. The document indicates construction would start in Winter 2020. Is this a firm date?</li> </ol>	<p>1. The public comment period for the Environmental Assessment ends on August 17. INDOT will review and develop responses to the public comments. The public comments and responses will be included in a Finding of No Significant Impact (FONSI) request package that is submitted to FHWA for consideration. FHWA will either issue a FONSI or make the determination an Environmental Impact Statement</p>

						<p>3. Are the details about what work is to be done finalized or is there still potential for significant change?</p>	<p>(EIS) is required for the project. If FHWA issues a FONSI, the National Environmental Policy Act (NEPA) process will be complete and the project will be allowed to move to final design and construction.</p> <p>2. The construction start date depends on the completion of the NEPA process. At this time, it is anticipated construction will start later this year.</p> <p>3. It is INDOT and FHWA's determination that the Preferred Alternative, <u>Alternative 4c</u>, provides the best balance of meeting safety and mobility needs while minimizing impacts to adjacent neighborhoods. Major changes to the alternative are not expected. Minor changes to ramp locations in the center of the interchange are possible in final design.</p>
PI002	01	Eamon	Jen	Public	7/23/20	<p>Was our letter, below, sent on June 30th included in INDOT's record?</p> <p>For past communications, you sent an email confirming receipt and addition to the record. I could not find our neighborhood's comments when searching the online record to review the EA report. It is possible that I just looked in the wrong place.</p>	<p>All comments received are reviewed and considered as part of the project, but only comments received during a formal comment period are included in the formal project record. A formal response is developed when they are submitted during a formal comment period.</p> <p>There is currently a formal comment period for the project from July 17 through August 17. Your comments will be included in the formal project record for the EA and included in the Finding of No Significant Impact (FONSI) request package which will be posted to the website.</p>
PI002	02	Eamon	Jen	Public	7/23/20	<p>Windsor Park Neighborhood Association, Inc. cannot sign the MOU as a concurring party because the plan does not satisfy concerns raised during the CSS process and the solutions designed are not equitable.</p> <p>For most of the underpasses, there are planned upgrades that will improve pedestrian and bike access, lighting and landscaping. Unfortunately, the Roosevelt Ave/Commerce Avenue underpass, while originally under discussion to receive the same treatment, was left out of the final plan. <b>This</b></p>	<p>The Roosevelt Avenue/Commerce Avenue bridge does not require replacement since it was reconstructed in 2008 as part of the \$175 million I-70 "Super 70" project.</p> <p>Although the bridge is not being replaced, INDOT adjusted its plans in the spring of 2020 to include new sidewalks, lighting, and landscaping under the Roosevelt Avenue/Commerce Avenue bridge. These design changes were made in consultation with the City of Indianapolis. They are described in Commitments 57 and 58 on page 74 of the EA.</p>

						<p>means that the neighborhoods that have the worst connectivity to each other and that also happen to have a higher percentage of neighbors who do not own a car, will be excluded from the basic pedestrian and bicycling upgrades planned for the North Split area.</p> <p>Windsor Park neighbors find this problematic. We view INDOT's decision regarding this underpass as a continuation of the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color- and a lack of parity. <b>We see a need for restorative justice.</b> This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood.</p> <p>Impacts on our neighborhoods should have been considered more carefully as a part of INDOT's review.  <a href="https://secure.in.gov/indot/files/ES_EnvironmentalJusticeGuidance_2012.pdf">https://secure.in.gov/indot/files/ES_EnvironmentalJusticeGuidance_2012.pdf</a></p> <p><b>You have already received a copy of the letter the Commerce Ave. Stakeholders have sent to Mayor Hogsett and City Councillors and may also view our joint letter <a href="#">here</a>.</b> The letter explains why we think this is needed, our goals, map, photos and demographic data.</p>	<p>The revised plans for the Roosevelt Avenue/ Commerce Avenue bridge were presented to the North Split Community Advisory Committee on July 27 and the North Split Environmental Justice Working Group on July 28. They were presented at the North Split Virtual Public Information Meeting on July 30 and at the in-person public hearing on August 3.</p> <p>Illustrations of the pedestrian, lighting, and landscaping improvements at the Roosevelt Avenue/ Commerce Avenue bridge are provided on the project website, <a href="https://northsplit.com/ea-sessions/">https://northsplit.com/ea-sessions/</a>, and in the virtual project office.</p>
PI002	03	Eamon	Jen	Public	7/23/20	<p>Furthermore, we are not assured that sound levels in our community will not increase. Previously, you explained that, while our neighborhood would have an imperceptible increase in noise, it would be mitigated by the new overpass- which was planned to be quieter due to no expansion joints and sound reducing pavement.</p>	<p>Noise model results show only a 1 decibel increase in noise in the Windsor Park neighborhood, which is below the perceptible threshold of 3 decibels. As described in Section F - Noise, starting on page 48 of the EA, and the Traffic Noise Technical Report in Appendix I of the EA, noise studies were conducted within the project area based on guidelines outlined in INDOT's Traffic Noise Analysis Procedure using the industry standard model developed by the Federal Highway Administration.</p> <p>Noise will be reduced by removal of expansion joints at bridges being replaced, but replacement of the</p>

							Roosevelt Avenue/Commerce Avenue bridge was never part of this project. See response to Comment PI002-2 regarding the condition of the Roosevelt Avenue/Commerce Avenue bridge. The entire project area will benefit from the use of sound reducing pavement when existing interstate segments are replaced.
PI002	04	Eamon	Jen	Public	7/23/20	We are also concerned that, while verbal assurances have been made regarding the landscaping, hardscaping and artwork under the 10th Street underpass (Payne Connection), details to protect these investments have not been placed in the MOU.	Restoration of the Payne Connection artwork is addressed by commitment 16 on page 69 of the EA as follows: "The public art sculptures, lanterns, and signs that are currently located along the Payne Connection shall be removed and stored during construction. The public art sculptures, lanterns, and signs shall be reinstalled once the interstate bridges have been constructed. Coordination with the Near East Area Renewal (NEAR) shall occur prior to re-installation of these features to determination their locations within the Payne Connection."
PI002	05	Eamon	Jen	Public	7/23/20	<p>We hope that INDOT will reconsider its plan and final MOU to include:</p> <ul style="list-style-type: none"> <li>• Reduce Roosevelt/Commerce Avenue to 3 lanes between 16th Street and Brookside Parkway to slow traffic and make room for wider sidewalks and safer bicycling</li> <li>• Cut back the underpass slope to allow more light and an improved sense of spaciousness for pedestrians</li> <li>• Construct a Commerce Avenue Connector Trail parallel and adjacent to the interstate linking to the Monon, Cultural, and Pogue's Run Trails that restores neighborhood and downtown connectivity</li> <li>• Replace and upgrade intersection and signals appropriate to safe pedestrian and bicycle crossings (given the heavy truck traffic)</li> <li>• Fill in the missing sidewalk links for safe connectivity since this is the only</li> </ul>	<p>Planned improvements at the Commerce Avenue underpass are based on the existing roadway configuration. The City of Indianapolis has not identified planned changes at the underpass location or on connecting streets and pedestrian facilities. Since the Commerce Avenue bridge is not being replaced, the underpass slope will not be modified.</p> <p>A pedestrian facility along the north side of I-70 was previously considered and deemed not appropriate due to safety and maintenance concerns with its location at the bottom of the slope next to one of the busiest interstates in the region.</p> <p>Changes to intersections, traffic signals, IndyGo bus access, sidewalks, and the proposed neighborhood gateway are outside the North Split project area and under the jurisdiction of the City of Indianapolis.</p> <p>See response to Comment PI002-03 regarding noise studies. The bridge type does not affect the noise model results. Noise model results were presented at</p>

						<p>connecting north- south passage between Rural Street and College Avenue</p> <ul style="list-style-type: none"> <li>• Create a neighborhood gateway for Martindale Brightwood and a portal between the neighboring Near East neighborhoods</li> <li>• Share the revised sound assessment for the neighborhoods around the Commerce Ave. bridge, now that the bridge will not be replaced</li> <li>• Add protections, replacement assurances for the Payne Connection hardscape, landscape and art (excluding the murals).</li> </ul> <p>Please enter our comments in the record.</p>	<p>a Martindale-Brightwood neighborhood meeting on November 14, 2019.</p> <p>See response to Comment PI002-04 regarding restoration of the Payne Connection.</p>
PI002	06	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter]</p> <p>The North Split project has not addressed the harm caused to neighborhoods along I-70 East when the original interstate was constructed. We are disappointed that there are no plans to make pedestrian safety and quality of life improvements to the Commerce Avenue and the Alabama underpass, nor to increase connectivity between existing trails and transit. We request you work with INDOT to make relatively low-cost investments to help our neighborhood residents achieve equitable transportation parity and make important progress toward the city's connectivity and neighborhood safety goals. We would argue that the other neighborhoods impacted by the North Split project have had their connectivity and quality of life objectives more fully met than our neighborhoods which are more impacted.</p> <p>The current physical and psychological disconnection as well as economic damage done by decades of divestment in our under-resourced neighborhoods is the devastating legacy of the original 1960s interstate construction. As a matter of restorative justice - too long in coming - safety,</p>	<p>See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.</p> <p>Pedestrian safety and aesthetic improvements are incorporated into the design of all bridge replacements over local streets in the project area. Unlike other underpass locations within the North Split project area, the existing bridges at Alabama Street and Commerce Avenue are not being replaced. Although the bridge infrastructure will not change, connectivity and quality of life improvements will be made at Alabama Street and Commerce Avenue, including pavers in sidewalk areas, new underpass lighting, and enhanced landscaping.</p> <p>Most bridges within the North Split project area are in poor condition and require replacement. Replacing the bridge allows for a wider bridge opening because the existing bridge columns and slanted abutment wall are removed. This provides for a wider pedestrian surface.</p> <p>The Commerce Avenue/Roosevelt Avenue bridge is in good condition. It was rehabilitated in 2008 as part of the Super 70 project. There are no bridge joints (the typical cause of leaking/deterioration), the beams were recently painted (no rust/deterioration),</p>

						<p>connectivity, health and quality of life inequities must be addressed.</p> <p>The Commerce Avenue/I-70 underpass is the only connection point between Martindale- Brightwood and the Near Eastside. It also is a convenient route to downtown (that will help alleviate congestion on 16th Street.) Pedestrians and cyclists use this dark and cramped route to travel to work, the grocery store, the Spades Park Library, cultural institutions, shops, parks and eateries each day. School children walk or cycle to Arsenal Tech Campus and The Oaks Academies in Hillside and in Brookside along dangerous and unsafe sidewalks beside the traffic lane. It is important to recognize that a quarter of our neighbors do not own a car, and are not well-served by IndyGo, making improvements especially important.</p>	<p>portions of the piers are essentially new due to widening.</p> <p>The eastbound bridge will be widened to tie into the new interstate ramp system. Because the Commerce Avenue/Roosevelt Avenue bridge will not be replaced, the bridge opening (sidewalks and roadway) will be remain the same width.</p>
<b>PI002</b>	07	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter]</p> <p>The intersection of 16<sup>th</sup> and Roosevelt Avenue, which becomes Commerce Avenue as it passes south under the interstate, is a crucial connection point to the dramatic new developments planned along Roosevelt Avenue and the broad range of industrial jobs along the North Mass Corridor. What’s more, East 16<sup>th</sup> Street is rapidly regaining its status as an urban “Main Street”, becoming a corridor for new commercial and residential development. Maintaining connections between our neighborhoods ensures access to new and essential employment and cultural opportunities.</p> <p>We are asking for healthful, multimodal access to the Monon Trail, the green spaces of O’Bannon, Spades and Brookside Parks, nearby grocery stores, and our places of work, school, and worship. We seek the ability to enjoy cultural and educational institutions such as the Circle City Industrial Complex, Ruckus, The Kan-Kan Cinema and Spades Park Library. These are necessary for overall public</p>	<p>See response to comment PI002-05 regarding INDOT plans and City of Indianapolis jurisdiction at Roosevelt Avenue/Commerce Avenue.</p>

						health, for mental and spiritual well-being, intellectual fulfillment and the overall quality of life experienced by our nearby neighbors.	
<b>PI002</b>	08	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter]</p> <p>Our goals are to:</p> <ul style="list-style-type: none"> <li>• Reduce Roosevelt/Commerce Avenue to 3 lanes between 16th Street and Brookside Parkway to slow traffic and make room for wider sidewalks and safer bicycling</li> <li>• Cut back the underpass slope to allow more light and an improved sense of spaciousness for pedestrians</li> <li>• Construct a Commerce Avenue Connector Trail parallel and adjacent to the interstate linking to the Monon, Cultural, and Pogue’s Run Trails that restores neighborhood and downtown connectivity</li> <li>• Improve access to IndyGo bus routes #25, #17, #2 and the #10</li> <li>• Replace and upgrade intersection and signals appropriate to safe pedestrian and bicycle crossings (given the heavy truck traffic)</li> <li>• Fill in the missing sidewalk links for safe connectivity since this is the only connecting north-south passage between Rural Street and College Avenue</li> <li>• Create a neighborhood gateway for Martindale Brightwood and a portal between the neighboring Near East neighborhoods</li> </ul>	See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.
<b>PI002</b>	09	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter]</p> <p>INDOT’s policy states that “any disproportionate impact on an environmental justice population that cannot be eliminated in design requires INDOT to address those issues through an Environmental</p>	INDOT has followed the agency’s Environmental Justice (EJ) policies throughout the development of the North Split Project. These policies apply to the components being installed or modified as part of the project. Although INDOT has taken care to address social issues throughout the project area in a positive

						<p>Process” (<a href="https://secure.in.gov/indot/files/ES_EnvironmentaJusticeGuidance_2012.pdf">https://secure.in.gov/indot/files/ES_EnvironmentaJusticeGuidance_2012.pdf</a>). We believe INDOT should have done that for the North Split project since the interstate cut off neighborhood connectivity.</p> <p>The citizens of our neighborhoods must be afforded the same ease of access to work, recreation and cultural activity as the other neighborhoods affected by INDOT’s plans for the North Split. Lockerbie, the Old North Side and Chatham Arch, will be receiving improvements that foster their connectivity and prioritizes their well-being (safe passage or safety). This is a matter of equity and justice. Do not ignore and neglect our neighborhoods this time. Let’s change history and build goodwill. Please tell INDOT to incorporate our requests.</p>	<p>way, neither INDOT nor FHWA EJ policies are intended to mitigate disproportionate impacts of original construction. A discussion of EJ for the North Split project is provided starting on page 61 of the EA and in the EJ Technical Memorandum in Appendix K of the EA.</p> <p>See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements. Improvement opportunities at underpasses are driven largely by whether the bridges are being replaced. Although Alabama Street and Commerce Avenue bridges will not be replaced, improvements will be made to enhance pedestrian safety and aesthetics, including pavers in sidewalk areas, new underpass lighting, and enhanced landscaping. The design approach and the treatments being implemented are the same at these two locations.</p>
PI002	10	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter map]</p> <p><b>Commerce Ave Underpass and INDOT Trail Connection</b> a link between 16th Street transit, the Monon Trail, Pogue’s Run Trail and Mass Ave transit: an imperative for access to work for challenged neighborhoods impacted by original Interstate construction.</p>	<p>See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.</p>
PI002	11	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter drawing]</p> <p><b>Commerce Ave I-70 Underpass:</b> an opportunity to retrofit the underpass to a pedestrian and bike friendly passage that is well lit, clean and suitable for the frequent use it would encourage between neighborhoods separated by the original Interstate construction.</p> <p>A road diet would reduce Commerce Avenue from four lanes to three lanes between 16th St. and Brookside Parkway. The underpass is currently a barrier to a trail connection between the Monon</p>	<p>See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.</p>

						and Pogue's Run trails and bus stops on 16th and Mass Ave.	
<b>PI002</b>	12	Eamon	Jen	Public	7/23/20	[From Commerce Avenue Stakeholders letter photo 1]  Looking north along Commerce towards I-70. The existing sidewalks are narrow and along the curb line of Commerce Avenue. We are requesting the city allow INDOT to reduce the number of vehicular lanes to three instead of four and use the leftover space for a wider sidewalk that is buffered from traffic.	See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.
<b>PI002</b>	13	Eamon	Jen	Public	7/23/20	[From Commerce Avenue Stakeholders letter photo 2]  The existing INDOT Lift Station on the southeast side of the Commerce Ave I-70 underpass is a hazard to pedestrians and not maintained. The neighborhoods request that INDOT install a driveway apron that meets ADA requirements and control their runoff from the access drive to prevent the build-up of debris on the sidewalk.	The installation of a new driveway at the INDOT lift station is not included in the North Split Project.
<b>PI002</b>	14	Eamon	Jen	Public	7/23/20	[From Commerce Avenue Stakeholders letter photo 3]  Looking south from 16th Street Intersection. Frequent truck traffic and narrow sidewalks along the existing travel lane make walking scary and challenging, especially for children. Three children were recently killed walking along Roosevelt Ave near here before it converts to Commerce Avenue.	See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.
<b>PI002</b>	15	Eamon	Jen	Public	7/23/20	[From Commerce Avenue Stakeholders letter photo 4]  Looking south from 16th Street Intersection. While the bridge structure was rehabilitated recently and is not being replaced, pedestrian safety measures were not provided.	See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.
<b>PI002</b>	16	Eamon	Jen	Public	7/23/20	[From Commerce Avenue Stakeholders letter photo 5]	See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.

						Light Levels and Safety. The existing lights in the Commerce Avenue underpass do not provide balanced illumination for the sidewalk areas.	
PI002	17	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter photo 6]</p> <p>East 10th Street/Payne Connect10n. This is an example of a shared use path suitable for pedestrians and bicyclists with a buffer from traffic. The adjacent neighborhoods envision a similar treatment for Commerce Ave underpass (previous INDOT funded project as part of Hyperfix at the request of the City).</p>	See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.
PI002	18	Eamon	Jen	Public	7/23/20	<p>[From Commerce Avenue Stakeholders letter photos 7 and 8]</p> <p>Looking east from 16th Street. An existing Alley used by bicyclists and pedestrians between Roosevelt &amp; Valley Ave.</p> <p>Proposed access point from Roosevelt Avenue for the INDOT connector trail that connects Commerce to the Monon Trail within INDOT right-of-way.</p>	See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.
PI003	01	Eamon	Jen	Public	7/24/20	<p>Our neighborhood Board's comments and declination to sign the MOA were submitted to you on June 30th, within the MOA period, as stated in your email to the Consulting Parties. Your email to the Consulting Parties from Friday, May 8th stated:</p> <p><b>"INDOT provided the Revised MOA to consulting parties to see the final changes. We encourage consulting parties to sign the MOA as a Concurring Party, though this is not a requirement of Section 106. We hope parties do sign in recognition of our extended coordination process, but you are not required to do so. Recognizing the need for each party to coordinate internally, Concurring Party signatures can be accepted until the end of June."</b></p>	<p>Your comments will be included in the project record as part of the North Split Environmental Assessment (EA) comment period. At the end of the EA formal comment period on August 17, 2020, INDOT will record each comment along with an INDOT response in the formal record for the project.</p> <p>However, we did want to clarify a few items regarding the Section 106 consultation.</p> <p>The section 106 process and resulting MOA relate specifically to properties and districts listed in or eligible for listing in the National Register of Historic Places (NRHP). The process was structured to provide numerous opportunities for discussion, comments, and responses in the development of the Section 106</p>

						<p>We feel that it is important that the MOA record itself shows any parties who were invited to sign but declined to sign and why they declined. Since you would have received the responses and comments from all parties by the end of June, can you share a list of parties, like us, who were invited but who declined and their responses?</p> <p>Perhaps, there is no formal comment period allowed as a part of the MOU signature gathering? If so, that is a huge misstep. <i>There has to be a way to recognize parties who have made a good faith effort to remain engaged in the process but who do not agree with the plan.</i> There has to be a way to record their comments, prior to moving on the next phase (where we are now). Otherwise, what is the point?</p>	<p>MOA. These opportunities were shared in a series of memos to all consulting parties.</p> <p>At the time of the May 8 email, the MOA was complete and Consulting Parties were invited to sign if they wished. This was voluntary and not required. Comments were not requested. The final MOA with signature pages was sent to consulting parties for their records.</p> <p>During the Section 106 process, many comments were made regarding topics not directly related to NRHP properties. These were outside the scope of the Section 106 process but were still considered as part of the EA process.</p>
<b>PI003</b>	02	Eamon	Jen	Public	7/24/20	<p>The revised plan does nothing to alleviate the historic and current damage the North Split imposed on the neighborhoods who are most economically challenged and the connectivity solutions in the MOA are not equitable. The obvious lack of parity is why our neighborhood also signed on to the Letter from the Commerce Avenue Stakeholders, a group of neighborhoods and stakeholders on both sides of the North Split.</p> <p>How does INDOT plan on addressing our concerns?</p>	<p>See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.</p> <p>See response to Comment PI002-05 regarding the goals identified in the Commerce Avenue Stakeholders letter of June 24, 2020.</p>
<b>PI004</b>	01	Shaver	Carrie	Public	7/25/20	<p>I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, lighting and landscaping to the Commerce Avenue underpass afforded to most of the other underpasses. To not do so is to continue the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color- and a lack of parity. We see a need for restorative justice. This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood.</p> <p>Do the right thing.</p>	<p>See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.</p>

<b>PI005</b>	01	Annala	Ellen	Public	7/26/20	Look at Madrid. They went underground and reduced city traffic in a wonderful way. Very impressive.	A review of potential concepts for reconstructing downtown interstates, including tunnel concepts, is presented in the "System-Level Analysis of Downtown Interstates" completed in May 2018. This report is available on the project website – <a href="https://northsplit.com/project-documents/">https://northsplit.com/project-documents/</a> .
<b>PI006</b>	01	Effler	Shannon	Public	7/27/20	I want to know why INDOT is going to tear down a section of the downtown highway, on the Northsplit all the way down to the Washington Street bridge for two years but aren't going to change or do anything innovative about it when they rebuild. Why is Indianapolis missing this opportunity?  It seems that none of the creative partnerships or innovative solutions to promote connectivity, economic development, or Quality of Life factors will be implemented. What will be the fate of the SE side when they come for the Southsplit?	Working with the community at numerous neighborhood meetings, connectivity, economic development, and quality of life factors were major considerations in the CSS process and the development of Aesthetic Design Guidelines. The CSS process is described on pages 5 and 7 of the EA. This process and the project elements that resulted are also described on the project website – <a href="https://northsplit.com/">https://northsplit.com/</a> .
<b>PI007</b>	01	Marquess	Jon	Public	7/27/20	I hope the engineers can get it right this time. I feel they have done this project once or twice already. How many millions have we spent on this interchange already.  That's like they totally screwed up the 465 south to 65 south exit. It is still a traffic nightmare. I have no idea why they didn't make it a 2 lane exit ramp. Total waste of money.	INDOT has not made major investments on this interchange since it was built. As described in the discussion of project purpose and need, starting on page 8 of the EA, the pavement and nearly all of the bridges in the project area have been in place since the 1960's and 1970's with no major reconstruction since they were originally installed.
<b>PI008</b>	01	Taft	Michael	Public	7/27/20	I'm writing to offer comment as a representative of a 188-unit multifamily development at 1515 Lewis St. We have three major comments: <ul style="list-style-type: none"> <li>We were previously under the impression that there were to be significant improvements to the Monon Trail between 10th St and 15th St. This included multiple renderings in INDOT presentations of pavers, public art, and lighting. In the most recent EA, there is only a simple commitment to increase the</li> </ul>	One of the concepts presented as an "additional opportunity" during the CSS process was the Monon Landing, located along the Monon Trail north of 10 <sup>th</sup> Street. Additional opportunities were defined as options requiring partnerships. The concept was presented to the CSS Resource Group, comprised of agency and City staff involved in infrastructure development and maintenance, but there is insufficient interest at this time to move forward.  The potential exists to implement a project of this type in the future, but it is not a part of the North Split Project.

						width from 10' to 14'. This is a disappointment and we'd like to advocate for the reintroduction of improvements to this stretch that is severely impacted by the interstate.	
<b>PI008</b>	02	Taft	Michael	Public	7/27/20	<ul style="list-style-type: none"> <li>We would like to emphasize that the current condition of the Lewis St underpass is extremely poor and request that this underpass will include new sidewalks. Some of the example sections are unclear and indicate the city may be responsible for that scope.</li> </ul>	There are no existing sidewalks along Lewis Street within the project area. The project will not add sidewalks along Lewis Street.
<b>PI008</b>	03	Taft	Michael	Public	7/27/20	<ul style="list-style-type: none"> <li>We would like to request that sound barrier NB3W stop at Lewis St rather than continue to the Monon. As the only impacted receptor property for this section, we hope this request carries weight.</li> </ul>	Shortening sound barrier NB3W to stop before the bridge over Lewis Street and the Monon Trail will result in less noise reduction at some receptors. Further coordination with the commenter occurred to make sure they were aware of the predicted noise results both with NB3W on the bridge structure and off the bridge structure. The commenter is still in favor of having NB3W stop short of the bridge, before Lewis Street and the Monon Trail. This change will be made to NB3W as part of the project.
<b>PI009</b>	01	Gehlhausen	Nick	Public	7/28/20	<p>I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, lighting and landscaping to the Commerce Avenue underpass afforded to most of the other underpasses.</p> <p>You may have already received other requests for this, and I am adding my voice to the requests.</p> <p>Please let me know if you have questions or need to discuss.</p>	See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.
<b>PI010</b>	01	Breunig	Preston	Public	7/29/20	I believe all semi-trucks should be prohibited from traveling through downtown on I-70 and I-65. They should be forced to use 465 as a by-pass for downtown. I would be happy to discuss this matter further if you wish to contact me.	As numerous semi-trucks must access locations inside I-465, including downtown, it is assumed this comment refers to through trucks. Regulating through traffic movements on the interstate system is beyond the scope of the North Split Project.

<b>PI011</b>	01	Surfus	Kathleen	Public	8/1/20	<p>I am a resident on the near Eastside. I urge you to include the Roosevelt Ave/Commerce Ave underpass in upcoming INDOT plans.</p> <p>For most of the underpasses, there are planned upgrades that will improve pedestrian and bike access, lighting and landscaping. Unfortunately, the Roosevelt Ave/Commerce Avenue underpass, while originally under discussion to receive the same treatment, was left out of the final plan. This means that the neighborhoods that have the worst connectivity to each other and that also happen to have a higher percentage of neighbors who do not own a car, will be excluded from the basic pedestrian and bicycling upgrades planned for the North Split area.</p> <p>Windsor Park neighbors find this problematic. We view INDOT's decision regarding this underpass as a continuation of the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color and a lack of parity. We see a need for restorative justice. This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood.</p>	See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.
<b>PI012</b>	01	Surfus	Kay	Public	8/3/20	<p>I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, lighting and landscaping to the Commerce Avenue underpass afforded to most of the other underpasses.</p>	See response to Comment PI002-02 regarding planned Roosevelt Avenue/Commerce Avenue improvements.
<b>PI013</b>	01	Biggio	Elizabet	Public	8/3/20	<p>I am concerned about the lack of meaningful improvements to pedestrian traffic underneath the interstate bridges. I am also concerned the upgrades being offered will not be maintained as the underpasses are neglected now. The Monon detour is a good touch, but the desire for increased connectivity to the neighborhoods needs more attention.</p>	INDOT is improving bicycle and pedestrian infrastructure throughout the North Split Project area. The reconstructed interstate bridges will have wider openings underneath, allowing all sidewalks to be wider than they are today. A mixture of concrete panels and asphalt pavers will be used to provide a fresh, modern appearance. New lighting will also be provided under the bridges. The new infrastructure will also be easier to maintain.
<b>PI013</b>	02	Biggio	Elizabet	Public	8/3/20	<p>In regard to historic properties, it is disappointing nothing can be done to mitigate the adverse</p>	See response to Comment PI013-01 regarding pedestrian connectivity.

						effects caused by the original interstate construction other than visual shielding – the same pedestrian connectivity issues are affecting the historic districts.	<p>INDOT has followed the Section 106 process throughout the development of the North Split Project. Although INDOT has taken care to address historic property effects throughout the project area in a positive way, neither INDOT nor FHWA policies are intended to mitigate impacts of original construction.</p> <p>The Section 106 Memorandum of Agreement (MOA) in Appendix D of the EA includes several mitigation measures to address adverse effects to historic properties as a result of the North Split Project.</p>
<b>PI014</b>	01	Wolfe	Bryan	Public	8/3/20	Please consider providing construction companies a monetary \$ incentive (like Hyperfix project a few years ago) to expedite their completion. This will be a major inconvenience and it would be great if they had a \$ reason to expedite construction to minimize the inconvenience.	Typical INDOT projects bid on price alone, but this procurement was best-value, which takes schedule into account from the time of design-build team selection. INDOT established maximum allowable durations for project completion and for specific traffic movements and roadway closures. If the design-build team exceeds these schedule durations, they will be assessed liquidated damages in the form of monetary costs paid for not having the project complete or the specific traffic movement open.
<b>PI015</b>	01	Bower-Bir	Jacob	Public	8/3/20	I've got limited time, so I will couch this and say that I appreciate you guys and the public work you do. That must be hard in a state like Indiana. And I guess -- I guess what I wanted -- my -- my comment is this: You have this logo, "Driving progress." I think it's supposed to mean, like, we're driving -- I'm driving in progress. But what it really says to me -- what this project says to me is that we are -- it's -- it's driving progress. It's -- this is progress for drivers, you know, which is real progress, a -- a broader meaningful progress, and a broader understanding of transportation would not be doubling down on this highway that cuts through the center of our city and suggest that Indianapolis is a good city to drive through. It's -- we should be kind of repairing that scar that exists. It's -- and it's this concrete -- it's this -- it's this strain on the environment. It's segregated our city more than it	<p>One of the early activities of the North Split Project was to consider a broad range of options regarding what to do with the downtown interstate system, including decommissioning the interstates, replacing them with boulevards, reconstruction them in tunnels, and depressing them. See response to Comment PI005-01 regarding the System-Level Analysis of Downtown Interstates.</p> <p>Although it was determined that the best course for this project is to move forward with interstate construction as shown in the current plan, a number of improvements to neighborhood connectivity and quality of life were incorporated into the project by means of the CSS process. See Comment PI006-01 regarding the CSS Process and Comment PI013-01 regarding pedestrian connectivity.</p>

						<p>already was, and it makes it hard today to interconnect and enjoy the neighborhoods that would otherwise constitute the greater downtown area. And so my fear is that -- well, my -- my broader fear is that as an agency, you know, INDOT is -- is not about transportation. It's about cars, and it's about moving cars specifically quickly, and it's not integrated well with the urban fabric that is Indianapolis. And it's also -- well, my fear is also that we will be trapped in this 1960s and '70s mindset that by doubling down on this project and making these repairs, we are committing ourselves to this highway for longer instead of doing something that many other cities, cities like Phoenix -- and Indianapolis should not be competing with Phoenix. We should be better than Phoenix. You know, but they are finding ways to build over their highways and -- and help build better highways underground, or if the existing highway is on top of the ground, build over them, or clever solutions that make sense in 2020. We're doing repairs that were engendered by construction techniques in the 1960s and '70s, and I feel like we're still designing like it's the 1960s and '70s. So I'll stop there. I do appreciate it. Thank you.</p>	
PI016	01	Duffy	Carlette	Public	8/3/20	<p>So I guess my first -- it's more so of a question as in terms of the -- how does this affect the crossover or lead for coming from 70, getting off on West Street, because that's my neighborhood. So I'm wondering how -- and I travel that way a lot, so would that break that off? And if that's so, then where are the conversations with Ransom Place and the Eastbrook townhouse homes, which are neighborhoods that are over there that would be affected by that.</p>	<p>Traffic from I-70 will continue to have access to the West Street exit. Traffic from I-70 will no longer be able to exit at Pennsylvania Street, which will require them to use other downtown exits to enter downtown. Traffic simulation models indicate more than two thirds of the traffic that have otherwise used the Pennsylvania Street ramp will follow the collector distributor road with exits at Michigan Street and Ohio Street. The remaining traffic will divert to West Street, 21<sup>st</sup> Street or exits on the south side of downtown. Thus, there will be diversion of traffic to West Street, but it is not expected to be excessive and will be offset to some degree by an increase in traffic using the Pennsylvania Street exit from I-65.</p>

							The project team did not meet specifically with Ransom Place to discuss these traffic shifts, but a representative from Ransom Place participated on the Community Advisory Committee and the EJ Working Group.
<b>PI016</b>	02	Duffy	Carlette	Public	8/3/20	And then also, due to what has happened in the past with contractors that are engaged in this process is that most of them are union, which is great, but what typically happens is they don't have the personnel in the area to hire from in their union pools, and they will go to surrounding states, and for two years' worth of work, people would be willing to come for that, but we have such a drastic need right here in the City of Indianapolis. So what can we do to encourage that the contractors, not only the ones that are doing the work in the area, but those also for -- who are already contractors in the area, that they will be offered opportunities in this. So looking for employment opportunities for those who are working in Indy and who are living Indianapolis, and then also for those companies that could potentially participate.	Federal funding requirements do not allow INDOT to specify contractors eligible to bid on projects based on the origin of the company or the hometowns of their employees. The requirements do allow goal setting for disadvantaged business enterprises (DBEs), which are often smaller local companies. The North Split Project has an established DBE participation goal of 9% for construction.
<b>PI017</b>	01	Bower-Bir	Nathan	Public	8/3/20	I thank you again for this session. I'm starting to see the environmental justice impact assessment that was conducted, and as you noted, there were no disproportionate impacts on minority or low-income populations identified. However, we're thinking, on the divisions that the existing highway put into our city, that it further segregated the city and several of us to our neighborhoods. I wonder whether that assessment was historic looking as well because I -- it could be that that initial construction probably did disproportionately affect minority and low-income populations, and the continued existence of it maintains that historic injustice. And so while doing these repairs, or this reconstruction, may not introduce new disparities, but it very well could continue existing ones.	See response to Comment PI002-09 regarding the project EJ analysis and potentially disproportionate impacts of original construction.
<b>PI018</b>	01	May	Ethan	Public	8/6/20	I'm seeing a discrepancy about changes to the Delaware Street on-ramp, and I wanted to see which was right.	The Delaware Street ramp will provide access to I-70 but it will not provide access to I-65 or the collector-distributor road to Michigan Street, Ohio Street, and

						The picture of the preferred alternative in Page 5 of the hearings handout says there will not be I-65 access from Delaware, but the “Modified Downtown Access” slide of the presentation from the hearings says there will be. Which is the case?	Fletcher Avenue. An error found in some preliminary project materials was corrected prior to the public hearing. The information in the EA and on the project website is also correct.
<b>PI019</b>	01	Baker	Raymond	Public	7/23/20	Please consider all of the neighbors impacted by any changes under consideration. Please consider changes that reach out 20 to 30 years forward.	As described in the EA, beginning on page 2, an extensive public outreach program was carried out throughout the North Split Project environmental process. The Context Sensitive Solutions (CSS) process described on pages 5 and 7 of the EA was especially effective in engaging the community and providing the opportunity for them to influence the outcome of the designs.  Project designs are based on forecasted conditions in 2041.
<b>PI020</b>	01	Brandyberry	Jim	Public	7/27/20	Please do not capitulate to the voices of a few businesses who would limit the design. Do what is best for the many, not the few. Don't let the tail wag the dog!	Although care has been taken to consider and respond to public input throughout the North Split Project development process, there has been no compromise in achieving the project needs, which are to improve safety, replace deteriorated roads and bridges, and reduce congestion through the project area.
<b>PI021</b>	01	Ho	Thomas	Public	7/24/20	Reconfiguring the interchange so traffic on northbound I-65 and eastbound I-70 does not need to cross paths between the North Split and South Split.  Be sure to KEEP this feature!	This prime benefit of the North Split Project will be achieved in final construction.
<b>PI022</b>	01	Bachle	Chris	Public	7/25/20	I've heard this brought up before in the information sessions but I also want to express my concern with the loss of the Delaware St on-ramp access to I-65 from I-70 W.  I use this ramp every weekday morning on my way to work off of Harding St and every other car around me that uses the Delaware St ramp is taking I-65 south (I don't ever really see any cars weaving over to I-70 east in the morning). I suspect this is because there is no other good way to go I-65 south / I-70 west from the near north side	Adding a slip ramp from College Avenue would require entering vehicles to cross paths with all the collector-distributor road traffic from I-70 to get to I-65 southbound or I-70 westbound. This “weave” is the movement that causes major safety problems in the interchange today and is being eliminated at all locations in the new design.  See response to Comment PI023-01 regarding access to I-65 from Delaware Street and alternate routes to I-65 south.

						<p>other than going several miles away to Keystone, weave through the mess of streets / wait on the stoplights to use the already busy West St ramp, or travel across downtown to get to Washington St. This onramp is also an important connector to other parts of downtown (Fletcher Ave, East St, Ohio St).</p> <p>I heard and get that keeping the existing access creates a safety hazard with the weave for 1-70 E traffic which is heavy in the evening rush hour. I think a good alternative would be to create an on-ramp from College Ave at 11th St (or in the immediate area) onto the collector road which would then give access to 1-65 S / 1-70 Was well as the near east neighborhoods. The new north split interchange looks to be creating ample space to make this happen in the ROW where 11th St dead-ends (would actually just be using the land that the existing 1-65 S to collector exit takes up now) or in the ROW just south of 1-65 and just east of College (in between the existing commercial building and 1-65 - this option could likely use most if not all of the existing 1-65 S to collector road exit road bed). Creating this on-ramp also creates good and closer access to the expanding north end of Mass Ave (including the new bottleworks development).</p> <p>In summary, removing this ramp's access greatly reduces access to 165 south and 170 west for a large and growing population of people that live on the near northside of downtown. The interstate cuts through this neighborhood so removing easy access to the existing full interstate options should not happen. An acceptable alternative would be to create a new on-ramp at College Ave which could adequately serve these neighborhoods as well as the north end of Mass Ave (including the new Bottleworks development).</p>	
<b>PI023</b>	01	Elmer	Kate	Public	7/26/20	Can someone explain what options those of us who currently access 65 S using the Delaware ramp will	See response to Comment PI026-01 regarding the trade-offs among alternatives involving the Delaware

						have under this plan? The remaining ways to access 65 S from downtown cannot, in my experience, handle the extra volume. When the Delaware ramp was closed last summer, alternatives quickly turned into gridlock. I cannot fathom that situation becoming permanent.	Street entrance ramp. Providing access to I-70 was clearly the priority since traffic demand is so much higher for that movement compared with I-65 south, which is an indirect movement going north to go south. Alternative access to I-65 south is available at West Street or Washington Street.
PI024	01	Moore	Terri	Public	7/27/20	I live off Kentucky avenue I travel everyday to 465 going north to work there's a sign says that exist will be closed August 3. 2030 doesn't say how long it will be closed I will need to find another way while that exist is closed so need to know how long they plan on closing it.	The segment of interstate referenced in this comment is not located in or near the North Split Project area. The question and email address has been forwarded to INDOT4U.com, INDOT's customer service address, for a direct response.
PI025	01	Pond	Douglas	Public	7/30/20	<p>-As a 35+-year resident and homeowner in East Lockerbie, we feel that the noise evaluation bypassed our concerns. Noise levels by trucks, can far exceed the parameters outlined in this report especially trucks without working mufflers (straight pipes) using engine braking. We have measured staccato noise levels similar to a loud lawn mower or near speakers in a rock concert.</p> <p>-An expensive sound-wall (as planned) would reduce this high-decibel noise pollution BUT so would an inexpensive and expedient city-county ordinance outlawing the use of engine braking (Jake brakes) in Marion County. There is absolutely no need for using 'Jake brakes'on the flat and level roads within the county. Their main purpose is to reduce brake over-heating in the mountains for large trucks, not to be used in relatively flat population areas to irritate drivers. Many other Indiana cities, both large and small, have outlawed engine braking and it had been very successful in reducing the loudest of road noise. It is mind-boggling that this option was never considered in such and extensive and expensive environmental analysis.</p> <p>-A majority of home residents (24/7 impacted) voted for a sound wall, mainly because of the constant super-loud blasts from 'Jake brakes" but</p>	<p>See response to Comment PI002-03 regarding the noise analysis.</p> <p>NB7 is the potential noise barrier considered near Lockerbie Square neighborhood. Surveys were sent in mid-October 2019 to benefited receptors in accordance with INDOT noise policy. The response rate was below 50%, so a second survey was sent to non-responders early in November 2019. After the second survey, along with four public meetings, social media posts, and emails, fewer than one-quarter (23%) of NB7 benefited receptors had responded, with 63% expressing support for this barrier.</p> <p>INDOT also considered other factors when determining if a noise barrier should be recommended. The State Historic Preservation Officer provided a letter to INDOT and FHWA, dated November 1, 2019, expressing deep concern about the visual effect of NB4, NB5, and NB7 on the setting of the historic districts near the North Split. The letter described the noise barriers as an additional and severe adverse effect to the character and setting of these resources, greatly amplifying the visual impact of the existing interstate highway intrusion within the historic districts. A similar letter was received from the Administrator for the Indianapolis Historic Preservation Commission on November 8, 2019.</p> <p>The INDOT Traffic Noise Analysis Procedure recognizes the potential for conflicts in mixed-use developments,</p>

						<p>our input was overridden by other interests. The voice of proximate residents was marginalized and disregarded in this environmental analysis so this issue should be revisited before construction begins.</p> <p>-To solve this problem, with little expense to the taxpayer, a simple ordinance could be passed outlawing engine braking in the city and signs posted in critical areas on interstates especially entering the downtown North and South Splits. A cheap and effective way to address noise pollution from the interstates versus an expensive and intrusive sound wall in downtown Indy.</p> <p>-Implementing a City-County ordinance to ban "Jake Brakes" and u-muffled vehicles should be an integral part of the environmental mediation related to the North Split renovation.</p>	<p>as barriers to protect residences may block line of sight to adjacent businesses. The survey response rate from businesses along NB7 was near 50%. Of those businesses that responded, 90% were opposed to the installation of noise barriers.</p> <p>Local ordinances, such as the one suggested, are outside the scope of the North Split Project.</p>
PI026	01	Franco	Alberth	Public	7/31/20	<p>First of all, I want to say thank you for such a detailed investigation of the project! It is clear to me as a resident of Indianapolis that a lot of thought has gone into this project before spending money on construction.</p> <p>I have read through the proposal presentation and saw that the committee was interested in pursuing alternative 4c where a reduced lane would be used for the new highway as a compromise to fewer entrances into 165/1-70. I am wondering why 4a is not the preferred option where there is no access lanes from Pennsylvania and Delaware? The increased land area available from option 4a seems like a better option for overall environmental offset (the area could be used to plant trees to offset carbon emissions and help with the noise reduction, right?)</p> <p>Alternatively, would it make sense to have an option 4d where the restricted lane is instead repurposed for an accident investigation zone?</p>	<p>A detailed description of the alternatives and the review process leading to the selection of Alternative 4c are provided in the Project Level Screening Report, located here <a href="https://northsplit.com/project-documents/">https://northsplit.com/project-documents/</a>. The report was posted for public input on the project website and the information was presented at a public open house in October 2018. The alternatives differed in the degree of access at Pennsylvania and Delaware Streets. There was minimal support for Alternative 4a, which minimized physical impacts and eliminated access resulting in greater traffic impacts, Alternative 4b, which had greater physical impacts and provided all access, and Alternative 5, which created the most physical impact by providing all access and adding through lanes. There was a clear consensus for Alternative 4c, which provided a compromise between impacts and access at the ramps.</p>

						<p>I would be happy to continue this conversation via email.</p> <p>Thank you for all your hard work.</p>	
<b>PI027</b>	01	Stephen	Ashley	Public	8/5/20	<p>I appreciate INDOT's decision to move forward with the replacement of the current North Split. As a resident of Wayne County, I am a frequent user of the North Split and I have seen and experienced the deterioration of the roadways. (Granted, rehabilitation efforts have improved the experience, especially when compared to the utter decay of 1-70 on the eastern side of the state that is being addressed, on a temporary basis, this year.) As for the proposed alternative, I find it acceptable given the spatial and financial limitations. I sincerely appreciate the elimination of the weave between the flows of through-traffic for 1-65 and 1-70 as that has regularly caused headaches when coming from the airport and other destinations on the southwest side of downtown. My only specific requests are that: 1) in addition to trees and other greenery in the to-be-vacant north, I would like to see some public art (like along 1-70 on the south side of downtown, and 2) I would like the lane routings painted on the road surface (as along 1-465 approaching 1-70 on the east side). Thank you for considering my thoughts.</p>	<p>1) In most cases, public art is financed privately or locally rather than by INDOT highway improvement funds. However, the North Split Project includes many features specifically designed to accommodate public art in the future. Members of the art community advised the North Split Project team as part of the CSS Resource Group. See response to Comment PI006-01 regarding the CSS Process.</p> <p>2) While the use of word and symbol pavement markings is widespread on arterial roadways, they are rarely used on interstate highways, primarily because they lose effectiveness at higher speeds. They are used at the I-70/I-465 interchange on selected lower speed ramps as an added safety measure. As conditions are monitored through the North Split area in the future, this is one among many options that might be considered if needed to enhance public safety.</p>
<b>PI028</b>	01	Lee	Janice	Public	8/6/20	<p>Please email me the location on your website that I can find the 3d flyover. I am interested in seeing the new configuration. Thanks.</p>	<p>The 3-D flyover is also available for viewing at the virtual project office, which can be accessed from a link at <a href="https://northsplit.com/">https://northsplit.com/</a>.</p>
<b>PI029</b>	01	Wiker	Shirley	Public	8/6/20	<p>I really like the plans and can't wait until the project is complete. Thank you to all involved.</p>	<p>Thank you for your comment.</p>
<b>PI030</b>	01	Greenwell	Michael	Public	8/15/20	<p>I want to see what this is about???</p>	<p>The best source of information regarding the project is the project website, <a href="https://northsplit.com/">https://northsplit.com/</a>.</p>
<b>PI031</b>	01	Bekele	Aster	Public	8/15/20	<p>I am writing to request INDOT provide the same upgrades that will improve pedestrian and bike access, and beautification to the Commerce</p>	<p>See response to Comment PI002-02 regarding Roosevelt Avenue/Commerce Avenue improvements.</p>

						Avenue underpass afforded to most of the other underpasses	
<b>PI032</b>	01	Phillips	Diane	Public	8/16/20	<p>I reviewed the project documents. Your presentation failed to mention a few things related to 165 access to/from downtown.</p> <p>1. Pine St ramp access to N65. Is it open? closed? Open some of the time? You indicate the Pine St ramp to east 170 is open.</p> <p>2. S 165 access to the Michigan/Ohio collector? Will traffic traveling southbound on 165 be able to use the collector to Michigan/ Ohio or is it only for 170 (I know it shows Fletcher and East St exists from the collector are closed to all traffic).</p>	<p>1. Pine Street access to I-65 north will be closed as long as the I-65 mainline is closed, which could be up to two years.</p> <p>2. Southbound I-65 will not have access to the collector-distributor road during North Split construction.</p>
<b>PI033</b>	01	Hannon	Eric	Public	8/17/20	<p>First of all I want to thank you for your willingness to listen to the Indianapolis residents and get our input on the I65/I70 project. I appreciate the thoughtfulness and compassion that you have shown so far on the planning for this project. I am writing to you as a downtown Indianapolis resident, who treasures the rich Indianapolis past and cares deeply about its future. I am asking you to carefully consider Rethink I65/70's Context Sensitive Solution submission. By putting a focus on building a truly unique urban interchange that speaks to who we are and celebrates our Capital City (pedestrian-friendly design that connects neighborhoods, usable space under the overpasses, improvements to our city with parks, trails, trees and infill development) the 165/170 can benefit all of Indianapolis and surrounding areas, as well as serve the state's transportation needs.</p> <p>Thank you for providing an open channel for our suggestions and for listening.</p>	<p>The Rethink Coalition provided responses to Round 1 (Visioning) of CSS meetings on April 26, 2019, to Round 2 (design detail) CSS meetings on August 15, 2019, and to the Aesthetic Design Guidelines produced by the CSS process on April 10, 2020. In all three cases, meetings were held by the North Split Project team and Rethink Coalition leadership. Although all recommendations and requests were not accommodated, the Coalition had a large influence on the ultimate configuration and features of the interchange.</p>
<b>PI034</b>	01	Miller	Ross	Public	8/17/20	<p>My comment concerning the Interstate 70 North Split is that the Pennsylvania off ramp and</p>	<p>See response to Comment PI026-01 regarding the Project Level Screening Report and selection of Alternative 4c.</p>

						Delaware on ramp ARE Needed. Interstate 70 needs to have MORE lanes through downtown Indianapolis. I have noticed increased traffic from Shadeland to downtown Indianapolis over the last decade. More lanes and more on and off ramps are needed to quickly enter and leave downtown Indianapolis.	
<b>PI035</b>	01	Bailey	Rick	Public	8/17/20	As a DeSoto complex resident, I'm concerned about the probable increased traffic on Park Ave. While I understand this street is not on the official detour route, I expect that drivers will find Park a suitable alternative. The street currently is in disrepair and additional traffic will only serve to exacerbate the issue. Do you have plans to improve the condition of Park as part of your project?	There are likely to be traffic increases on a majority of downtown streets during North Split construction. These increases may occur on streets such as Park Avenue that are not designated as arterials and not designed for high volumes of traffic.  The existing geometric and drainage conditions on Park Avenue are under the jurisdiction of the City of Indianapolis.  Prior to the inception of construction, a video log will be prepared of streets within the North Split Project area for use in identifying damage from construction. This damage will be repaired by the North Split contractor.
<b>PI036</b>	01	Hoch	Eric	Public	8/17/20	Sad to see the Penn/Meridian St. exit be eliminated.	See response to Comment PI026-01 regarding the Project Level Screening Report and selection of Alternative 4c. This exit will remain open to I-65 traffic.
<b>PI037</b>	01	McQuiston	J.W.	Public	8/17/20	In a brief survey of recently completed highway/pedestrian bridges, both in the US and across the world, one can quickly find many elegant examples of structures in which form is beautifully integrated in the whole.  Millau Viaduct, France Genoa Bridge-Italy by Renzo Piano, Whittier Bridge-USA Lesner Bridge -USA 41st Street Pedestrian Bridge-Chicago Ponte Segunda Circular-Portugal Webb Bridge-Melbourne, Australia  By contrast, the current aesthetic treatments for the underpass structures on the North Split give	The bridge treatments are matched to the functional needs of this project. A series of design applications for use on the various bridge types allows for the infrastructure spaces to have a unified and cohesive look. Other design elements, including spaces that can accommodate future art and decorative identification such as a street name are also identified as part of the architectural bridge enhancements. Public art is not part of this project, but can be added over time, and can be incorporated into the various panels on both the bridge elevation and abutment panels. The aesthetic design treatments were developed in collaboration with local neighborhoods and communities and were vetted through an extensive public engagement process.

						<p>the impression of hastily applied afterthoughts-employed to "dress up" an otherwise standard set of INDOT bridge components.</p> <p>The appearance is cosmetic in the purest sense, it has little to do with structure, or any sense of place. It seems to recall entry features to a suburban mall development.</p> <p>Assuming these improvements will be around for the next half century, why not elevate the design level for something truly outstanding, at least at select locations.</p> <p>Your grandkids will thank you.</p>	
<b>PI038</b>	01	Williams	Delma	Public	8/15/20	<p>Yes. I am calling concerning the underpass at Commerce Avenue and Alabama Avenue. My concern is that these underpasses be upgraded to the same standard and level as the upgrade to the other bridges that are being rebuilt for the North Split. My area is Martindale-Brightwood. We have been left out too long. I thank you for your consideration. Have a great day.</p>	See response to Comment PI002-02 regarding Roosevelt Avenue/Commerce Avenue improvements.
<b>PI039</b>	01	Miller	Ross	Public	8/17/20	<p>My comment concerning the North Split is that the on ramp from Delaware needs to be there and the off ramp for Pennsylvania Avenue needs to remain. I would like to see more lanes from Shadeland all the way through downtown Indianapolis on I-70 to handle the extra traffic that I've seen the last decade. Thank you.</p>	See response to Comment PI026-01 regarding the Project Level Screening Report and selection of Alternative 4c. The Delaware Street entrance ramp will remain, but will only provide access to I-70 eastbound. The Pennsylvania Street exit ramp will remain, but will only allow access to Pennsylvania Street from I-65 northbound.
<b>PI040</b>	01	Gunn	Jacklyn McMillan	Public	8/17/20	<p>Good morning. My name is Jacklyn McMillan Gunn and I'm calling to request that the Commerce and the Alabama be upgraded to the same level as the other bridges that will be reconstructed through the rebuilding of the North Split. Thank you.</p>	See response to Comment PI002-02 regarding Roosevelt Avenue/Commerce Avenue improvements.
<b>PI041</b>	01	Rider	Alan	Public	8/17/20	<p>Here's a comment on the North Split plans that I read about in this morning's IndySTAR... I learned this morning that in the current plan the Penna Street exit will only be available to traffic from the south, no longer to I-70 traffic from the east. I</p>	See response to Comment PI026-01 regarding the Project Level Screening Report and selection of Alternative 4c.

						<p>agree that the weave pattern that we have now is dangerous and should be ameliorated. But eliminating access of westbound I-70 traffic to Penna St is a mistake.</p> <p>Not all who exit to Penna St go south into downtown. Those of us who live on the Near North and Mapleton etc, use that exit all the time; but we loop around under the freeway (usually with no need to completely stop...) and then take Delaware northbound to get home. It's quick and efficient... I do that every day. So do lots of others...</p> <p>With this new traffic pattern, we would have to exit either at Rural or into the middle of downtown instead, increasing congestion thru the Mass Ave district either way we go.</p> <p>Is there a solution to that...??</p>	In addition to the options noted in the comment, West Street and 21 <sup>st</sup> Street exits are also available.
<b>PI042</b>	01	Anonymous		Public	8/17/20	I wish we had been able to take it further and buried the roads. We will still have the interstate dividing our city. ???	See response to Comment PI005-01 regarding System-Level Analysis of Downtown Interstates.
<b>PI043</b>	01	Sannes	Robert	Public	8/3/20	The map on your website is very hard to read. Could you please provide maps that are more legible.	Clicking the image should open in a new window as a PDF that can be zoomed in on. That feature was apparently not working for the main map. That has been corrected. The issue also relates to the browser. Legibility is good on Google Chrome and Firefox, but is poor on Internet Explorer. This was conveyed to the commenter at the time of the question.



FONSI REQUEST

ATTACHMENT C: SECTION 106 DOCUMENTATION

**FEDERAL HIGHWAY ADMINISTRATION'S  
SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties) AND  
SECTION 106 FINDINGS AND DETERMINATIONS  
AREA OF POTENTIAL EFFECT  
ELIGIBILITY DETERMINATIONS  
EFFECT FINDING  
I-65/I-70 North Split Interchange Reconstruction Project  
Indianapolis, Marion County, Indiana  
DES. NOS.: 1592385 and 1600808**

**AREA OF POTENTIAL EFFECTS  
(Pursuant to 36 CFR Section 800.4(a)(1))**

The original Area of Potential Effects (APE) for the I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) (North Split Project) for Section 106 started as a 0.25-mile buffer around the entire project area, which was increased to a 0.5-mile buffer around the existing North Split interchange. Subsequent to the completion of the Historic Property Report (HPR), an expanded APE was developed to take into account anticipated temporary truck traffic increases on city streets during construction of the North Split Project. The segments listed below are included in the proposed expansion of the APE (See Appendix A: Figure 1 for a map of the APE).

- Fall Creek Parkway Segment, from 38<sup>th</sup> Street south to College Avenue
- College Avenue Segment, from Fall Creek Parkway south to original APE
- West Street Segment, from the I-65 interchange south to the I-70 interchange
- Missouri Street Segment, from West Street south to the I-70 interchange
- Pennsylvania Street Segment, south from original APE to Madison Avenue
- Madison Avenue Segment, from Pennsylvania Street to I-70 interchange
- St. Clair Street Segment, from original APE west to West Street
- Fort Wayne Avenue Segment, from original APE south to St. Clair Street
- East Street Segment, from original APE south to original APE
- Washington Street Segment, from Rural Street west to original APE
- Rural Street Segment, from the I-70 interchange south to Washington Street
- Massachusetts Avenue Segment, from original APE east to Rural Street

**ELIGIBILITY DETERMINATIONS  
(Pursuant to 36 CFR 800.4(c)(2))**

There are a total of 51 historic resources listed in or eligible for the National Register of Historic Places (NRHP) in the APE. Of these, 37 historic resources are listed in the NRHP, 2 are National Historic Landmarks (NHLs), and 12 have been determined eligible for the NRHP through the Section 106 consultation for this undertaking.

Table 1 is a complete list of historic properties in the APE, including information on the property name, address, listing criteria, date of listing, and a brief description.

**Table 1. Historic Properties in the Area of Potential Effects**

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
<b>NHRP-listed Historic Resources</b>				
NR-0438	Herron-Morton Place Historic District	A and C	Late nineteenth- and early twentieth-century residential architecture	1983
NR-0157 and NR-0716	Old Northside Historic District	A and C	Residential and ecclesiastical architecture from the late nineteenth and early twentieth centuries	1978
NR-0926	Saint Joseph Neighborhood Historic District	A and C	Residential, commercial, and industrial resources reflecting the city's development during the late nineteenth and early twentieth centuries	1991
NR-0327	Chatham-Arch Historic District	A and C	Mixed-use neighborhood containing residential, commercial, and industrial resources	1980
NR-0525	Massachusetts Avenue Commercial Historic District	A and C	Architecturally important secondary retail district and service center for the adjoining residential areas	1982
NR-0853 and NR-2030	Lockerbie Square Historic District	A and C	Largely residential area with a wide range of architectural styles from before the Civil War to the early twentieth century	1973 and 1987
NR-0355	Fletcher Place Historic District	A and C	Collection of buildings from early settlement of the city's south side, including area's most prestigious residential neighborhood, modest housing, and a commercial corridor	1982
NR-0965	Cottage Home Historic District	C	Collection of late nineteenth-century workers' cottages and a grouping of buildings designed by the leading Indianapolis architectural firm of Vonnegut and Bohn	1990
NR-0084	Arsenal Technical High School Historic District	A and C	Significant for its association with Indiana's military history, for its association with Indianapolis' educational history, and for its architecture	1976
NR-1711	Indianapolis Park and Boulevard System Historic District	A and C	Significant for its association with early twentieth-century trend to regulate growth in cities and as a work of George Edward Kessler, a master in landscape architecture	2003
NR-2410/IHSSI #098-296-01173	Indianapolis Public Library Branch No. 6 1801 Nowland Avenue	A and C	Two-story Carnegie library built in 1911–1912 with elements of the Italian Renaissance Revival and Craftsman styles	2016
NR-0090/IHSSI #098-296-01219	Prosser House 1454 E. 10 <sup>th</sup> Street	C	One-and-one-half-story cross-plan house built in 1886	1975

**Table 1. Historic Properties in the Area of Potential Effects**

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
NR-0146/IHSSI #098-296-01375	Bals-Wocher House 951 N. Delaware Street	C	Significant example of an Italianate style house, built in 1870	1979
NR-0616.33/IHSSI #098-296-01367	Wyndham 1040 N. Delaware Street	A and C	Seven-story Tudor Revival-style apartment building built 1929	1983
NR-0203/IHSSI #098-296-01368	Pierson-Griffiths House 1028 N. Delaware Street	C	Built 1895, noted for its elaborate Victorian-era Second Empire and Greek Revival ornamental detailing	1978
NR-0694/IHSSI #098-296-01369	Calvin I. Fletcher House 1031 N. Pennsylvania Street	B and C	Queen Anne-style house built in 1895	1983
NR-0616.26/IHSSI #098-296-01379	Pennsylvania Apartments 919 N. Pennsylvania Street	A and C	Built in 1906	1983
NR-0616.25/IHSSI #098-296-01389	The Myrtle Fern 221 E. 9 <sup>th</sup> Street	A and C	Two-story apartment building built in 1925	1983
NR-0616.23/IHSSI #098-296-01390	The Shelton 825 N. Delaware Street	A and C	Five-story apartment building built in 1925	1983
NR-0616.09/IHSSI #098-296-01391	Cathcart Apartments 103 E. 9 <sup>th</sup> Street	A and C	Craftsman-style apartment building built in 1909	1983
NR-0616.19/IHSSI #098-296-01392	Lodge Apartments 829 N. Pennsylvania Street	A and C	Georgian Revival three-story apartment building built in 1905	1983
NR-0616.27/IHSSI #098-296-01393	Plaza Apartments 902 N. Pennsylvania Street	A and C	Renaissance Revival-style U-shaped building built in 1907	1983
NR-0616.03/IHSSI #098-296-01394	The Ambassador 39 E. 9 <sup>th</sup> Street	A and C	Six-story building with elements of the Sullivanese style, built in 1923	1983
NR-0085/IHSSI #098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St. Clair Street	C	Example of Beaux Arts style, designed by architect Paul Phillipe Cret, built 1913–1916	1975
NR-0616.08/IHSSI #098-296-01396	The Burton 821–823 N. Pennsylvania Street	A and C	Spanish Colonial Revival two-story building built ca. 1920	1983
NR-0725/IHSSI #098-296-01415	The Vera and The Olga 1440–1446 N. Illinois Street	C	Significant as one of the few examples of rowhouse construction	1984
NR-0641/IHSSI #098-296-01428	Independent Turnverein 902 N. Meridian Street	A and C	Built 1913–1914, building combines elements of the Prairie, Craftsman, and Renaissance Revival styles	1983
NR-0332/IHSSI #098-296-01651	Cole Motor Car Company 730 E. Washington Street	A	Significant for its association with a leading manufacturer of automobiles in the early twentieth century; built 1911–1913 of reinforced concrete	1983
NR-2266	Gaseteria, Inc. 1031 E. Washington Street	B and C	One-story Art Moderne office building built in 1941	2013
NR-1406	Manchester Apartments 960–962 N. Pennsylvania Street	C	Tudor Revival-style three-story mixed-use building built in 1929, designed by Henry Fitton	1998

**Table 1. Historic Properties in the Area of Potential Effects**

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
NR-1373	Sheffield Inn 956–958 N. Pennsylvania Street	C	Two-story Tudor Revival-style mixed-use building was designed by Henry Fitton and built in 1926–1927	1998
NR-0616.11/IHSSI #098-296-01370	Delaware Court 1005 N. Delaware Street	A and C	Tudor Revival-style apartment building, built 1917	1983
NR-0616.28/IHSSI #098-296-01385	The Spink (Renaissance Tower Historic Inn) 230 E. 9 <sup>th</sup> Street	A and C	Six-story Jacobethan Revival building, constructed ca. 1922; early high-rise apartment building	1983
NR-0897/IHSSI #098-296-01353	William Buschman Block 968–972 Fort Wayne Avenue	B and C	Italianate-style commercial building, built ca. 1879 by William Buschman	1988
NR-2027/IHSSI #098-296-14219	Morris-Butler House 1204 E. 12 <sup>th</sup> Street	C	Significant example of the Second Empire-style residence, built 1864	1973
NR-2043/IHSSI #098-296-14063	John W. Schmidt House (The Propylaeum) 1410 N. Delaware Street	A and C	Tudor Revival residence, built 1889–1891 for John W. Smith, president of the Indianapolis Brewing Company	1973
NR-0695/IHSSI #098-296-01373	Pearson Terrace 928–940 N. Alabama Street	A and C	Two-story Jacobethan Revival building was constructed ca. 1901–1902 by George C. Pearson	1984
<b>National Historic Landmarks (NHL)</b>				
NR-2066/IHSSI #098-296-14057	Benjamin Harrison Home/Presidential Site 1230 N. Delaware Street	A, B, and C	Two-and-one-half-story Italianate residence, built 1874–1875, and significant for its association with President Benjamin Harrison	1964
NR-2067/IHSSI #098-296-20038	James Whitcomb Riley House 528 Lockerbie Street	A and B	Two-story Italianate residence, built 1872; significant for its association with James Whitcomb Riley	1966
<b>NRHP-Eligible Historic Resources</b>				
NBI No. 4900233/HB-2611	Marion County Bridge No. 2520L N. Oriental Street over Pogue’s Run	C	Continuous reinforced concrete slab bridge with a horizontal curved deck representing an important bridge construction technique	N/A
N/A	Martin Luther King, Jr. Park 1702 Broadway Street	A and B	Significant for its association with Senator Robert F. Kennedy and his speech on April 4, 1968, following the assassination of Martin Luther King, Jr.	N/A
NR-1560/IHSSI #098-296-01309	School #27–Charity Dye Elementary School 545 E. 17 <sup>th</sup> Street	A and C	Two-story central section of the building was constructed in ca. 1882 in the Italianate style	2000
IHSSI #098-296-01212	John Hope School No. 26 1301 E. 16 <sup>th</sup> Street	C	Three-story U-shaped building designed by architect Elmer E. Dunlap in the Neoclassical style, completed in 1921.	N/A

**Table 1. Historic Properties in the Area of Potential Effects**

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
IHSSI #098-296-01220	James E. Roberts School No. 97 1401 E. 10 <sup>th</sup> Street	A and C	The school, with elements of Art Moderne and Art Deco, constructed in 1936 as a public school for disabled students	in NRHP boundary of Arsenal Technical H.S. H.D.
IHSSI #098-296-01378	Knights of Pythias 941 N. Meridian Street	C	Built 1925 in Gothic Revival-style with terra cotta façade	N/A
IHSSI #098-296-01421	Fame Laundry 1352 N. Illinois Street	C	Two-story commercial building built in 1929 and faced in terra cotta	N/A
IHSSI #098-296-01426	Stutz Motor Car Company 1002–1008 N. Capital Avenue	A and C	Four-story Commercial-style industrial building significant for its association with automobile industry in Indianapolis; built beginning in 1914	N/A
N/A	St. Rita’s Catholic Church Parish Complex 1733 Dr. Andrew J. Brown Avenue	A and C; criteria consideration A	Mid-Century Modern parish complex, built 1958, designed by Charles Brown and associated with African American history and Civil Rights movement	N/A
N/A	Saints Peter and Paul Cathedral Parish Historic District	A and C	Catholic Church complex with Neoclassical and Italian Renaissance Revival buildings built between 1891 and 1926	N/A
N/A	Windsor Park Neighborhood Historic District	A and C	Late nineteenth- to early twentieth-century streetcar suburb with one- to two-story buildings	N/A
NR-0653	Holy Cross/Westminster Historic District	A and C	Significant as Indianapolis’ largest intact inner-city neighborhood and German and Irish immigrants, and for its extensive collection of architectural styles.	1984

## EFFECT FINDINGS

Table 2 lists each property and its effect finding.

**Table 2. Effect Finding**

NRHP No./HB No./IHSSI No.	Name and Address of Resource	Effect Finding
<b>No Effect</b>		
NR-2410/IHSSI #098-296-01173	Indianapolis Public Library Branch No. 6 1801 Nowland Avenue	No Effect
NR-0090/IHSSI #098-296-01219	Prosser House 1454 E. 10 <sup>th</sup> Street	No Effect
NR-0146/IHSSI #098-296-01375	Bals-Wocher House 951 N. Delaware Street	No Effect
NR-0616.26/IHSSI #098-296-01379	Pennsylvania Apartments 919 N. Pennsylvania Street	No Effect
NR-0616.25/IHSSI #098-296-01389	The Myrtle Fern 221 E. 9 <sup>th</sup> Street	No Effect
NR-0616.09/IHSSI #098-296-01391	Cathcart Apartments 103 E. 9 <sup>th</sup> Street	No Effect
NR-0616.19/IHSSI #098-296-01392	Lodge Apartments 829 N. Pennsylvania Street	No Effect
NR-0616.27/IHSSI #098-296-01393	Plaza Apartments 902 N. Pennsylvania Street	No Effect
NR-0085/IHSSI #098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St. Clair Street	No Effect
NR-0616.08/IHSSI #098-296-01396	The Burton 821–823 N. Pennsylvania Street	No Effect
NR-0725/IHSSI #098-296-01415	The Vera and The Olga 1440–1446 N. Illinois Street	No Effect
NR-0641/IHSSI #098-296-01428	Independent Turnverein 902 N. Meridian Street	No Effect
NR-2043/IHSSI #098-296-14063	John W. Schmidt House (The Propylaeum) 1410 N. Delaware Street	No Effect
NR-1560/IHSSI #098-296-01309	School #27–Charity Dye Elementary School 545 E. 17 <sup>th</sup> Street	No Effect
NR-2067/IHSSI #098-296-20038	James Whitcomb Riley House 528 Lockerbie Street	No Effect
NBI No. 4900233/HB-2611	Marion County Bridge No. 2520L N. Oriental Street over Pogue’s Run	No Effect
IHSSI #098-296-01220	James E. Roberts School No. 97 1401 E. 10 <sup>th</sup> Street	No Effect
IHSSI #098-296-01378	Knights of Pythias 941 N. Meridian Street	No Effect
IHSSI #098-296-01421	Fame Laundry 1352 N. Illinois Street	No Effect
IHSSI #098-296-01426	Stutz Motor Car Company 1002–1008 N. Capital Avenue	No Effect

**Table 2. Effect Finding**

<b>NRHP No./HB No./IHSSI No.</b>	<b>Name and Address of Resource</b>	<b>Effect Finding</b>
N/A	Martin Luther King, Jr. Park 1702 Broadway Street	No Effect
N/A	St. Rita's Catholic Church Parish Complex 1733 Dr. Andrew J. Brown Avenue	No Effect
<b>No Adverse Effect</b>		
NR-0438	Herron-Morton Place Historic District	No Adverse Effect
NR-0355	Fletcher Place Historic District	No Adverse Effect
NR-0965	Cottage Home Historic District	No Adverse Effect
NR-0084	Arsenal Technical High School Historic District	No Adverse Effect
NR-1711	Indianapolis Park and Boulevard System Historic District	No Adverse Effect
NR-0616.33/IHSSI #098-296-01367	Wyndham 1040 N. Delaware Street	No Adverse Effect
NR-0203/IHSSI #098-296-01368	Pierson-Griffiths House 1028 N. Delaware Street	No Adverse Effect
NR-0694/IHSSI #098-296-01369	Calvin I. Fletcher House 1031 N. Pennsylvania Street	No Adverse Effect
NR-0616.03/IHSSI #098-296-01394	The Ambassador 39 E. 9 <sup>th</sup> Street	No Adverse Effect
NR-0616.23/IHSSI #098-296-01390	The Shelton 825 N. Delaware Street	No Adverse Effect
NR-0332/IHSSI #098-296-01651	Cole Motor Car Company 730 E. Washington Street	No Adverse Effect
NR-2266	Gaseteria, Inc. 1031 E. Washington Street	No Adverse Effect
NR-1406	Manchester Apartments 960–962 N. Pennsylvania Street	No Adverse Effect
NR-1373	Sheffield Inn 956–958 N. Pennsylvania Street	No Adverse Effect
NR-0616.11/IHSSI #098-296-01370	Delaware Court 1005 N. Delaware Street	No Adverse Effect
NR-0616.28/IHSSI #098-296-01385	The Spink (Renaissance Tower Historic Inn) 230 E. 9 <sup>th</sup> Street	No Adverse Effect
NR-0897/IHSSI #098-296-01353	William Buschman Block 968–972 Fort Wayne Avenue	No Adverse Effect
NR-0695/IHSSI #098-296-01373	Pearson Terrace 928–940 N. Alabama Street	No Adverse Effect
NR-0653	Holy Cross/Westminster Historic District	No Adverse Effect
NR-2066/IHSSI #098-296-14057	Benjamin Harrison Home/Presidential Site 1230 N. Delaware Street	No Adverse Effect
IHSSI #098-296-01212	John Hope School No. 26 1301 E. 16 <sup>th</sup> Street	No Adverse Effect
N/A	Saints Peter and Paul Cathedral Parish Historic District	No Adverse Effect
N/A	Windsor Park Neighborhood Historic District	No Adverse Effect

**Table 2. Effect Finding**

NRHP No./HB No./IHSSI No.	Name and Address of Resource	Effect Finding
<b>Adverse Effects</b>		
NR-0157 and NR-0716	Old Northside Historic District	Adverse Effect
NR-0926	Saint Joseph Neighborhood Historic District	Adverse Effect
NR-0327	Chatham-Arch Historic District	Adverse Effect
NR-0525	Massachusetts Avenue Commercial Historic District	Adverse Effect
NR-0853 and NR-2030	Lockerbie Square Historic District	Adverse Effect
NR-2027/IHSSI #098-296-14219	Morris-Butler House 1204 N. 12 <sup>th</sup> Street	Adverse Effect

The Federal Highway Administration (FHWA) has determined an "Adverse Effect" finding is appropriate for this undertaking. FHWA respectfully requests the Indiana State Historic Preservation Officer provide written concurrence with the Section 106 determination of effect for each property and the project's overall effect finding.

**SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties)**

This undertaking will not convert property from the resources listed above, which are Section 4(f) historic properties, to a transportation use. In addition, the proximity impacts to adjacent historic properties will not result in substantial impairment to the properties' activities, features, or attributes that qualify the properties for protection under Section 4(f). Therefore, no Section 4(f) evaluation is required for the above-listed historic properties.

*Michelle Allen*

bs  
 \_\_\_\_\_  
 Mayela Sosa  
 Division Administrator  
 FHWA-IN Division

Dec. 19, 2019  
 \_\_\_\_\_  
 Approved Date



Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739  
Phone 317-232-1646 Fax 317-232-0693 dhpa@dnr.IN.gov



January 17, 2020

Kia Gillette  
Environmental Project Manager  
HNTB Corporation  
111 Monument Circle  
Indianapolis, Indiana 46204

State Agency: Indiana Department of Transportation (“INDOT”)

Federal Agency: Federal Highway Administration (“FHWA”)

Re: DUAL REVIEW: 800.11(e) documentation and the Federal Highway Administration’s finding of “adverse effect” for the I-65/ I-70 North Split Interchange Reconstruction Project in the City of Indianapolis, Marion County, Indiana (Des. Nos. 1592385 and 1600808; DHPA No. 21534)

Dear Ms. Gillette:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108); implementing regulations at 36 C.F.R. Part 800, and the “Programmatic Agreement (PA) Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana” (“Indiana Minor Projects PA”); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code (“IAC”) 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed FHWA’s documentation of findings and determinations, which we received on December 20, 2019 under INDOT’s cover letter dated December 19, 2019.

In regard to archaeological resources, as previously indicated, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (“NRHP”) within the portions of the proposed project area described as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7 in the addendum Phase Ia archaeological records check and field reconnaissance survey report (Schwarz, 12/13/2019). No further archaeological investigations appear necessary. However, this identification is subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature. If archaeological deposits are encountered from the post-contact period, they will be evaluated regarding their eligibility for the NRHP in consultation with the staff of the Indiana SHPO. Please contact our office if such deposits are encountered. The archaeological recording must be done in accordance with the Secretary of the Interior’s “Standards and Guidelines for Archaeology and Historic Preservation” (48 F.R. 44716) and a report of the archaeological documentation must be submitted to our office for review and comment.

Furthermore, based on the submitted information and the documentation available to the staff of the Indiana SHPO, there is insufficient information regarding archaeological site 12-Ma-1062 (an abandoned rail bed containing, in situ, rail ties, rails, baseplates, and spikes; and portions of which lie within the Old Northside Historic District [NR-0716]) to determine whether it is eligible for inclusion in the NRHP. However, we concur with the opinion of the archaeologist, as expressed in the archaeological report (Schwarz, 12/13/2019), that the portions of archaeological site 12-Ma-1062 that lie within Area 8 of the proposed project area do not appear to warrant additional archaeological investigations. However, the portions of archaeological site 12-Ma-1062 that lie outside the proposed project area should be clearly marked so that they are avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological

investigations must be submitted to the DHPA for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archeology and Historic Preservation" (48 F.R. 44716).

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to DNR-DHPA within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.

We agree with FHWA's determinations and findings that the following 51 properties are the only above-ground properties within the area of potential effects that are either listed in or eligible for inclusion in the National Register of Historic Places; and we concur that the project's effects upon them are as indicated.

We concur that the undertaking will have No Effect upon the Indianapolis Public Library Branch No. 6, Prosser House, Bals-Woche House, Pennsylvania Apartments, The Myrtle Fern, Cathcart Apartments, Lodge Apartments, Plaza Apartments, Central Library of Indianapolis-Marion County Public Library, The Burton, The Vera and The Olga, Independent Turnverein, John W. Schmidt House (The Propylaeum), School #27- Charity Dye Elementary School, James Whitcomb Riley House, Marion County Bridge No. 2520L, James E. Roberts School No. 97, Knights of Pythias, Fame Laundry, Stutz Motor Car Company, Martin Luther King, Jr. Park, and St. Rita's Catholic Church Parish Complex.

We also concur that the undertaking will have No Adverse Effect upon Herron-Morton Place Historic District, Fletcher Place Historic District, Cottage Home Historic District, Arsenal Technical High School Historic District, Indianapolis Park and Boulevard System Historic District, Wyndham, Pierson-Griffiths House, Calvin I. Fletcher House, The Ambassador, The Shelton, Cole Motor Car Company, Gaseteria, Inc., Manchester Apartments, Sheffield Inn, Delaware Court, The Spink (Renaissance Tower Historic Inn), William Buschman Block, Pearson Terrace, Holy Cross/ Westminster Historic District, Benjamin Harrison Home/ Presidential Site, John Hope School No. 26, Saints Peter and Paul Cathedral Parish Historic District, and Windsor Park Neighborhood Historic District.

Furthermore, we concur that the undertaking will result in an Adverse Effect upon the Old Northside Historic District, St. Joseph Neighborhood Historic District, Chatham-Arch Historic District, Massachusetts Avenue Commercial Historic District, Lockerbie Square Historic District, and the Morris-Butler House.

Accordingly, we concur with FHWA's December 19, 2019, Section 106 finding of Adverse Effect for this federal undertaking as a whole.

Regarding the noise barriers, we were pleased to learn during the January 16, 2020 consulting parties meeting that NB4, NB5 and NB7 are no longer recommended for construction, as these would have represented the most significant visual impact to historic resources. For potential mitigation proposals, we found the discussion during the meeting to be helpful to our understanding of these ideas, most of which appeared to have broad support among the consulting parties present. We appreciate the consideration given to developing meaningful and project specific proposals to mitigate the adverse effect of the undertaking.

In terms of the issue of side slope treatment, we believe that the 'Do Not Disturb' areas that were designated make sense where there are larger, older trees worth preserving. We understand that there are other sections where there is currently poorer quality or smaller vegetation that could be sacrificed to provide work area during construction. We think it would be desirable to replant these areas with better quality vegetation as part of the mitigation. Where there is larger, more established vegetation, it may also make sense to retain the existing slope and provide for a slightly taller retaining wall. While minimization of the overall height of retaining walls continues to be a priority, this needs to be balanced against the desirability of retaining existing larger trees (where present) and keeping a maintainable slope that is not overly steep. Where taller retaining walls are deemed appropriate, we liked the idea of planting vegetation that would grow in front of or onto the wall to soften its appearance. Terracing may also be an appropriate solution within the Old Northside Historic District, St. Joseph Neighborhood Historic District, and Chatham-Arch Historic District, in any areas where the height difference is substantial and the horizontal space is severely limited, resulting in either a tall wall or an unusually steep grass slope. Retaining walls of traditional red clay brick or cut stone facing could complement the district's historic materials, with the

inclusion of trees and other native vegetation to provide an aesthetically pleasing transition, softening the visual impact within districts and adjacent to individually listed or significant resources in close proximity to the highway.

While we believe that retention of some portions of the earthen berm might provide a level of visual screening of the highway from adjacent neighborhoods, we also appreciate the views of other consulting parties which may desire a flatter, more open landscape between districts and the highway. Either way, we think that the inclusion of tree planting, with or without retention of earthen berms, would be a desirable and appropriate measure to improve the appearance of the project area from adjacent neighborhoods.

Additionally, we believe that the proposed connectivity improvements, education/interpretation oral history project, and vibration monitoring are important and desirable aspects of the mitigation proposal.

We look forward to receiving a draft memorandum of agreement for review that reflects these commitments and the additional ideas and input of consulting parties.

If you have questions about archaeological issues please contact Wade Tharp at (317) 232-1650 or [wtharp1@dnr.IN.gov](mailto:wtharp1@dnr.IN.gov). If you have questions about buildings or structures please contact Chad Slider at (317) 234-5366 or [eslider@dnr.IN.gov](mailto:eslider@dnr.IN.gov).

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:CWS:cws

emc: Anuradha Kumar, INDOT  
Shaun Miller, INDOT  
Susan Branigin, INDOT  
Mary Kennedy, INDOT  
Shirley Clark, INDOT  
Michelle Allen, FHWA  
Sarah Stokely, Advisory Council on Historic Preservation  
Mandy Ranslow, Advisory Council on Historic Preservation  
Kia Gillette, HNTB Corporation  
Mark Dollase, Central Regional Office, Indiana Landmarks  
Marsh Davis, Indiana Landmarks  
Rachel Franklin-Weekley, National Park Service  
Alesha Cerny, National Park Service  
Marjorie Kienle, Historic Urban Neighborhoods of Indianapolis  
Garry Chilluffo, Historic Urban Neighborhoods of Indianapolis  
Chad Lethig, Historic Urban Neighborhoods of Indianapolis  
Chad Lethig, Indiana Landmarks  
Elizabeth Nowak, Indianapolis Historic Preservation Commission  
Meg Purnsley, Indianapolis Historic Preservation Commission  
Brad Beaubien, Indianapolis Department of Metropolitan Development  
Melody Park, Indianapolis Department of Public Works  
Nancy Inui, Old Northside Neighborhood Association  
Garry Elder, Old Northside Foundation  
Travis Barnes, Old Northside Neighborhood Association  
Charles A. Hyde, Benjamin Harrison Presidential Site  
Mark Godley, St. Joseph Historic Neighborhood Association  
Shawn Miller, Chatham Arch Neighborhood Association  
Jeffrey Christoffersen, Lockerbie Square People's Club  
Marjorie Kienle, Lockerbie Square People's Club  
Jen Eamon, Windsor Park Neighborhood Association, Inc  
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 BOD  
Meg Storrow, Massachusetts Avenue Merchants Association

Ruth Morales, Mayor's Neighborhood Advocate, Area 10  
David Hittle, NESCO Land Use  
Desiree Calderella, Fountain Square Neighborhood Association  
Jon Berg, John Boner Neighborhood Center  
Patricia and Charles Perrin, property owners  
Jordan Ryan, North Square Neighborhood Association  
Joe Jarzen, Keep Indianapolis Beautiful, Inc.  
Luke Leising, property owner  
Mark Beebe, American Institute of Architects  
Glenn Blackwood, Fletcher Place Neighborhood Association, Inc.  
Jim Lingenfelter, Southeast Neighborhood Land Use Committee  
Paul Knapp, Interstate Business Group  
Betsy Merritt, National Trust for Historic Preservation  
Denise Halliburton, Old Near Westside/ Ransom Place  
Chelsea Humble, Riley Area Development Corp.  
Amina Pierson, Martindale Brightwood Community  
Diane Hunter, Miami Tribe of Oklahoma  
J. Scott Keller, Indiana Historic Preservation Review Board  
Chandler Lighty, Indiana Historic Preservation Review Board  
Anne Shaw Kingery, Indiana Historic Preservation Review Board  
Daniel Kloc, AIA, Indiana Historic Preservation Review Board  
April Sievert, Ph.D., Indiana Historic Preservation Review Board  
Joshua Palmer, AIA, Indiana Historic Preservation Review Board  
Jason Larrison, AIA, Indiana Historic Preservation Review Board  
Christopher Smith, Deputy Director, Indiana Department of Natural Resources

**MEMORANDUM OF AGREEMENT  
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,  
THE INDIANA DEPARTMENT OF TRANSPORTATION,  
THE INDIANA STATE HISTORIC PRESERVATION OFFICER, AND  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION  
REGARDING THE I-65/I-70 NORTH SPLIT  
INTERCHANGE RECONSTRUCTION PROJECT  
IN INDIANAPOLIS, CENTER TOWNSHIP, MARION COUNTY, INDIANA  
DES. NOS. 1592385 and 1600808**

**WHEREAS** the Federal Highway Administration ("FHWA") and the Indiana Department of Transportation ("INDOT") propose to reconstruct the I-65/I-70 North Split interchange as well as replace/rehabilitate bridges and replace pavement south along I-65/I-70 to the Washington Street interchange, west along I-65 to approximately Alabama Street (to Illinois Street along 11<sup>th</sup> and 12<sup>th</sup> Streets); and, east along I-70 to approximately the bridge over Valley Avenue (west of the Keystone Avenue/ Rural Street interchange) for the I-65/I-70 North Split Interchange Reconstruction Project ("North Split Project") in Indianapolis, Center Township, Marion County, Indiana; and

**WHEREAS** the North Split Project is subject to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and its implementing regulations (36 C.F.R. Section 800 [2017]) and Section 110(f) of the National Historic Preservation Act (54 U.S.C. § 306107); and

**WHEREAS** the FHWA, in consultation with the Indiana State Historic Preservation Officer ("Indiana SHPO"), has defined the North Split Project's original area of potential effects ("APE") for aboveground resources, as the term is defined in 36 C.F.R. Section 800.16(d), to an irregularly shaped area including the construction limits and an area approximately 0.25–0.5 mile around the construction limits of the project, with the distance varying based on the viewshed; as well as expanded areas along the following street segments: Fall Creek Parkway (from 38<sup>th</sup> Street south to College Avenue), College Avenue (from Fall Creek Parkway south to the original APE), West Street (from the I-65 interchange south to the I-70 interchange), Missouri Street (from West Street south to the I-70 interchange), Pennsylvania Street (south from the original APE to Madison Avenue), Madison Avenue (from Pennsylvania Street to the I-70 interchange), St. Clair Street (from the original APE west to West Street), Fort Wayne Avenue (from the original APE south to St. Clair Street), East Street (from the original APE south to the original APE), Washington Street (from Rural Street west to the original APE), Rural Street (from the I-70 interchange south to Washington Street), and Massachusetts Avenue (from the original APE east to Rural Street) as shown in Attachment A; and

**WHEREAS** the FHWA, in consultation with the Indiana SHPO, has defined the North Split Project APE for archaeological resources, as the term defined in 36 C.F. R. Section 800.16(d), to be the area within the construction right-of-way; and

**WHEREAS** the FHWA, in consultation with the Indiana SHPO, has found that the historic properties listed below are within the APE; and

- Herron-Morton Place Historic District
- Old Northside Historic District
- Saint Joseph Neighborhood Historic District
- Chatham-Arch Historic District
- Massachusetts Avenue Commercial Historic District
- Lockerbie Square Historic District
- Fletcher Place Historic District
- Cottage Home Historic District
- Arsenal Technical High School Historic District
- Indianapolis Park and Boulevard System Historic District
- Indianapolis Public Library Branch No. 6 (NR-2410; IHSSI # 098-296-01173)
- Prosser House (NR-0090; IHSSI # 098-296-01219)
- Bals-Wocher House (NR-0146; IHSSI # 098-296-01375)
- Wyndham (NR-0616.33; IHSSI # 098-296-01367)
- Pierson-Griffiths House (Kemper House) [NR-0203; IHSSI # 098-296-01368]
- Calvin I. Fletcher House (NR-0694; IHSSI # 098-296-01369)
- Pennsylvania Apartments (NR-0616.26; IHSSI # 098-296-01379)
- The Myrtle Fern (NR-0616.25; IHSSI # 098-296-01389)
- The Shelton (NR-0616.23; IHSSI # 098-296-01390)
- Cathcart Apartments (NR-0616.09; IHSSI # 098-296-01391)
- Lodge Apartments (NR-0616.19; IHSSI # 098-296-01392)
- Plaza Apartments (NR-0616.27; IHSSI # 098-296-01393)
- The Ambassador (NR-0616.03; IHSSI # 098-296-01394)
- Central Library of Indianapolis-Marion County Public Library (NR-0085; IHSSI # 098-296-01395)
- The Burton (NR-0616.08; IHSSI # 098-296-01396)
- The Vera and The Olga (NR-0725; IHSSI # 098-296-01415)
- Independent Turnverein (NR-0641; IHSSI # 098-296-01428)
- Cole Motor Car Company (NR-0332; IHSSI # 098-296-01651)
- Gaseteria, Inc. (NR-2266)
- Manchester Apartments (NR-1406)
- Sheffield Inn (NR-1373)
- Delaware Court (NR-0616.11; IHSSI # 098-296-01370)
- The Spink (Renaissance Tower Historic Inn) [NR-0616.28; IHSSI # 098-296-01385]
- William Buschman Block (NR-0897; IHSSI # 098-296-01353)
- Morris-Butler House (NR-2027; IHSSI # 098-296-14219)
- John W. Schmidt House (The Propylaeum) [NR-2043; IHSSI # 098-296-14063]
- Pearson Terrace (NR-0695; IHSSI # 098-296-01373)
- Martin Luther King, Jr. Park
- School #27–Charity Dye Elementary School (NR-1560; IHSSI # 098-296-01309)
- Holy Cross/Westminster Historic District
- Marion County Bridge No. 2520L; NBI No. 4900233
- John Hope School No. 26 (IHSSI # 098-296-01212)
- James E. Roberts School No. 97 (IHSSI # 098-296-01220)

- Knights of Pythias (IHSSI # 098-296-01378)
- Fame Laundry (IHSSI # 098-296-01421)
- Stutz Motor Car Company (IHSSI # 098-296-01426)
- St. Rita’s Catholic Church Parish Complex (AL062)
- Saints Peter and Paul Cathedral Parish Historic District
- Windsor Park Neighborhood Historic District

**WHEREAS** the FHWA, in consultation with the Indiana SHPO, has found that the National Historic Landmarks listed below are within the APE; and

- Benjamin Harrison Home/Presidential Site (NR-2066; IHSSI # 098-296-14057)
- James Whitcomb Riley House (NR-2067; IHSSI # 098-296-20038)

**WHEREAS** the FHWA, in consultation with the Indiana SHPO, has determined pursuant to 36 C.F.R. Section 800.5(a) that the North Split Project will have adverse effects on the Old Northside Historic District, the Morris-Butler House, the Saint Joseph Neighborhood Historic District, the Chatham-Arch Historic District, the Massachusetts Avenue Commercial Historic District, and the Lockerbie Square Historic District; and

**WHEREAS** the FHWA has consulted with the Indiana SHPO in accordance with Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and its implementing regulations (36 C.F.R. Section 800) to resolve the adverse effects; and

**WHEREAS** the public was given an opportunity to comment on the undertaking's adverse effects in a notice published on December 24, 2019, in the *Indianapolis Star*; and

**WHEREAS** the FHWA has invited the Advisory Council on Historic Preservation (“Council”) to participate in the consultation for the North Split Project, pursuant to 36 C.F.R. Section 800.6(a)(1), in an email dated March 26, 2018; and

**WHEREAS** the Council has elected to participate in consultation in a letter dated April 3, 2018; and

**WHEREAS** the FHWA, in consultation with the Indiana SHPO, has invited the Indiana Department of Transportation (“INDOT”) to participate in the consultation and to become a signatory to this Memorandum of Agreement (“MOA”); and

**WHEREAS** the Benjamin Harrison Presidential Site has participated in consultation and elected to become an invited signatory to this MOA; and

**WHEREAS** Keep Indianapolis Beautiful, Inc. has participated in consultation and elected to become an invited signatory to this MOA; and

**WHEREAS** the agencies, organizations, or individuals listed in Attachment B have participated in the consultation; and

**NOW, THEREFORE**, the FHWA, the Council, and the Indiana SHPO agree that, upon FHWA's approval of the North Split Project, the North Split Project shall be implemented in accordance with the following stipulations in order to take into account the effect of the North Split Project on historic properties.

## **STIPULATIONS**

FHWA, in coordination with INDOT, shall ensure that the following measures are carried out:

### **I. PROFESSIONAL QUALIFICATIONS**

- A.** In consultation with the Indiana SHPO, INDOT shall ensure that all work performed pursuant to this MOA is performed or supervised by a qualified individual and/or team(s) that meet the Secretary of the Interior's Professional Qualification Standards as outlined in Appendix A to 36 C.F.R. 61 for history, archaeology, architectural history, architecture, and/or historic architecture, as appropriate.
- B.** The individual and/or team(s) performing or supervising the archaeology investigations shall have supervisory experience in the prehistoric and historic archaeology of the central Indiana region. All work performed or supervised by such person or persons shall be conducted pursuant to the provisions of Indiana Code 14-21-1, 312 Indiana Administrative Code 21, 312 Indiana Administration Code 22, and the most current "Guidebook for Indiana Historic Sites and Structures Inventory-Archaeological Sites."

### **II. MEASURES TO MINIMIZE AND MITIGATE ADVERSE EFFECTS**

#### **A. Tree Preservation and Plantings**

- 1.** FHWA and INDOT shall ensure that project elements, including tree and vegetation plantings, are designed in accordance with the North Split Project Aesthetic Design Guidelines (Attachment C). Minor modifications may be made if approved by FHWA and INDOT as long as they are within the spirit of the Aesthetic Design Guidelines.
- 2.** FHWA and INDOT and/or its consultants shall provide a draft landscape and side slope plan (including scaled cross sections for each adjacent historic district) for consulting party review and comment at two points during the design process.
  - a)** Comment periods will be 30 calendar days.
  - b)** The first comment period will be for an initial review and comment.

- c) The second comment period will be to show how comments were addressed, allow comments on revisions, and solicit input regarding any remaining questions.
  - d) FHWA and INDOT shall make a good faith effort to address comments and shall provide responses regarding how or why comments were addressed or not addressed.
  - e) FHWA and INDOT shall have one consulting party meeting within each comment period to provide information and solicit feedback from consulting parties.
  - f) FHWA and INDOT shall have at least one neighborhood meeting within each comment period to solicit feedback from adversely affected historic districts. Residents of the Old Northside, Saint Joseph, and Chatham-Arch neighborhoods shall be the focus of the neighborhood meetings; however, the meetings will be open to the general public.
  - g) FHWA shall have the authority for final approval of actions regarding the implementation of aesthetic and landscaping measures.
3. Berms shall be included in the interchange design to provide visual shielding and noise reduction from the interchange ramps for the Old Northside and Chatham-Arch Historic Districts.
- a) The berms shall be located in the northwest quadrant of the interchange, extending from approximately 14<sup>th</sup> Street to College Avenue, and in the southwest quadrant of the interchange, extending from College Avenue to 10<sup>th</sup> Street.
  - b) The berms shall be sculpted into a softer, more natural shape and planted with trees such that they do not appear as abandoned “roadbeds”. The proposed shape of the berms shall be included in the draft landscape and side slope plan provided to consulting parties for comment.
  - c) All other remnants of previous “roadbed” use shall be removed from areas that will no longer serve such a use, including those adjacent to the O’Bannon Soccer Park.
4. INDOT shall develop a landscape maintenance plan for three years after tree and shrub planting.

5. INDOT shall engage Keep Indianapolis Beautiful, Inc. as a landscape advisor to provide recommendations and/or services for tree and shrub planting, monitoring, and maintenance for three years after planting.
6. INDOT shall replace trees and shrubs that do not survive during the first three years after planting. INDOT shall monitor planted trees and shrubs annually for three years. If dead trees or shrubs are identified during each annual monitoring, they will be replaced. If the replacement plant dies, it shall be replaced with a substitute species approved by INDOT.
7. INDOT shall identify “Do Not Disturb” areas within the project limits in order to preserve existing trees (Attachment C). The “Do Not Disturb” areas shall be marked with silt fence and signage. The only work that can occur in the “Do Not Disturb” areas is the installation of new drainage connections (to existing pipes). No clearing of trees 2-inch diameter at breast height (dbh) or greater shall be allowed in the “Do Not Disturb” areas. The “Do Not Disturb” areas shall be at the following locations:
  - a) Within the existing right-of-way of northbound I-65 adjacent to the Old Northside Historic District and Morris Butler House from College Avenue to Alabama Street. INDOT shall identify a work zone, where construction work can occur, which extends 15 feet north of the proposed retaining wall within this area. Vegetation within the existing right-of-way north of that shall be in the “Do Not Disturb” area.
  - b) Portions of the existing right-of-way of southbound I-65 where groups of mature trees are present, adjacent to the Saint Joseph Neighborhood and Chatham-Arch Historic Districts from College Avenue to Delaware Street.
  - c) Portions of the existing right-of-way of southbound I-65/ westbound I-70 where trees have been planted, adjacent to the Lockerbie Square Historic District from Michigan Street to New York Street.
8. If trees within the “Do Not Disturb” areas do not survive within one (1) year of the conclusion of construction activity within fifteen (15) feet of the area, INDOT shall plant replacement trees, at 2-inch dbh or greater in size, at a ratio of three to one (three replacement trees for each tree that does not survive). The replacement trees shall be planted in the “Do Not Disturb” areas if space allows or within INDOT right-of-way within the project area.
9. Outside of the “Do Not Disturb” areas, INDOT shall plant shrubs and trees (if appropriate for the slope and location) at the following locations:

- a) Within the 15-foot work zone north of I-65 northbound from College Avenue to Alabama Street.
- b) The side slope of southbound I-65 between Alabama Street and College Avenue.
- c) If the existing vegetation is removed during construction, along the western side slope of I-65/I-70 south of the interchange from 10<sup>th</sup> Street south to St. Clair Street.

10. INDOT shall plant trees 2-inch dbh or greater in size. This includes trees both in and out of the “Do Not Disturb” areas.

## **B. Connectivity Improvements**

- 1. FHWA and INDOT shall ensure project elements, including underpass treatments, are designed in accordance with the North Split Project Aesthetic Design Guidelines (Attachment C). Minor modifications may be made if approved by FHWA and INDOT as long as they are within the spirit of the Aesthetic Design Guidelines.
- 2. FHWA shall have the authority for final approval of actions regarding the implementation of connectivity improvements.
- 3. To improve connectivity between adversely affected historic districts, INDOT shall make the following connectivity improvements:
  - a) Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Alabama Street underpass shall include new lighting on the bridge, sidewalk pavers, and signage along Alabama Street identifying each neighborhood. Coordination shall occur with the Old Northside and Saint Joseph neighborhoods regarding their established logos and sign standards.
  - b) Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Central Avenue underpass shall include a wider bridge opening (65 feet to at least 76 feet), wider sidewalks, sidewalk pavers, new lighting with upgraded fixtures on the bridge, vertical bridge walls, elimination of drainage from the bridge above onto the street and sidewalks, and space for murals.
  - c) Between the Old Northside and Chatham-Arch Historic Districts, improvements to the College Avenue underpass shall include wider bridge openings (79 feet to at least 87 feet), wider sidewalks,

sidewalk pavers, new lighting with upgraded fixtures on the bridge, vertical bridge walls, elimination of drainage onto the street and sidewalks, and space for murals.

4. INDOT shall provide \$190,000 to the Benjamin Harrison Presidential Site towards the construction of the Old Northside Connector, a pedestrian and bicycle path to connect the alley south of the Benjamin Harrison Presidential Site to Pennsylvania Street. This stipulation will be implemented through an agreement between INDOT and the Benjamin Harrison Presidential Site.
5. INDOT shall construct a temporary detour for the Monon Trail during construction. The portion of the detour within the O'Bannon Soccer Park and within INDOT right-of-way west to College Avenue and under the College Avenue bridges will remain as a permanent feature to improve connectivity between the Old Northside and Chatham-Arch Historic Districts.
6. INDOT shall construct a temporary detour for the Monon Trail during construction. INDOT shall work with the City of Indianapolis to determine if the portion of the detour southwest of the interchange from College Avenue southeast to 10<sup>th</sup> Street can remain as a permanent feature to improve connectivity for the Chatham-Arch Historic District. Retaining this trail as a permanent feature is conditional upon INDOT reaching an agreement with the City of Indianapolis. The final decision shall be communicated to consulting parties.
7. INDOT shall install "No Construction Traffic" and "Local Traffic Only" signs at the entrance to the brick portion of 10<sup>th</sup> Street from Delaware Street to Central Avenue to protect the brick portion of 10<sup>th</sup> Street from construction traffic.
8. INDOT and its design-build team shall avoid the limestone curbs and street trees along 12<sup>th</sup> Street, north of I-65 northbound, during all construction activities. If damage occurs to the limestone curbs as a result of the North Split Project construction, INDOT shall repair the limestone curbs.

### **C. Vibration**

1. To avoid damage to historic properties, INDOT shall ensure that a Construction Vibration Monitoring and Control Plan ("Plan") is developed by the design-build team prior to beginning any construction activities. The Plan shall at least include all buildings within historic properties or districts within 140 feet of project construction activities. The Plan will include the following key elements:

- a) Identifying buildings that are sensitive to vibration;
  - b) Conducting pre-construction surveys of all residences, historic buildings, and other vibration-sensitive structures within 140 feet of the project corridor to determine the appropriate vibration limits for the type of structure and conditions of the structure;
  - c) Developing and implementing a vibration monitoring program for construction activities; ensuring that, whenever vibration levels exceed the maximum thresholds identified in Stipulation II.C.2., construction work causing that vibration will immediately stop until such time as qualified professionals have determined that modifications have been made in the construction activities to assure that no damage shall occur to historic properties;
  - d) Conducting post-construction surveys;
  - e) Phasing construction activities that create vibration so that multiple sources of vibration do not occur at the same time;
  - f) Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours;
  - g) Developing a method for responding to community complaints; and,
  - h) Keeping the public informed of proposed construction schedules, and identifying activities known to be a source of vibration.
2. Maximum thresholds for historic properties that shall not be exceeded are shown in Table 1 below. The values are presented in terms of peak particle velocity (PPV), the accepted method for evaluating the potential for damage.

**Table 1. Construction Vibration Thresholds (PPV)**

Type of Structure	Ground-borne Vibration Impact Level (PPV)
New Residential Structures	1.0 in/sec
Non-historic Older Residential Structures	0.50 in/sec
Fragile (non-engineered timber and masonry buildings)	0.20 in/sec
Extremely Fragile (buildings, ruins, ancient monuments)	0.12 in/sec

3. INDOT and/or its consultants shall provide the draft Plan to the North Split consulting parties (Attachment B) for a 30-day review period. INDOT shall respond to consulting party comments.
4. In the event vibration damage does occur as a result of the North Split Project construction activities (as evidenced by the pre- and post-construction surveys), INDOT shall ensure that the design-build team will be responsible for the cost and repair of any vibration damage to historic properties. Any repairs shall be coordinated with the Indiana SHPO to ensure they are carried out in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent on property owners allowing pre- and post-construction surveys of their buildings.
5. Where access to privately owned property is necessary for monitoring or damage repair, consent shall be obtained prior to entry.

### **III. TREATMENT OF ARCHAEOLOGICAL RESOURCES**

#### **A. Statutory and Regulatory Standards**

1. The studies completed pursuant to Stipulation III.D shall demonstrate a level of effort consistent with the 36 C.F.R. part 800 regulations in effect on the date upon which the last of the required signatories has signed this MOA and provide FHWA with the information to determine, in consultation with the Indiana SHPO, which archaeological properties are eligible for inclusion in the NRHP. FHWA shall acknowledge and seek the special expertise of any federally recognized Indian Tribes in assessing the eligibility of historic properties that may possess religious and cultural significance to them.
2. In implementing Stipulation III.A through III.E., INDOT may consult with the consulting parties listed in Attachment B, others identified in accordance with the 36 C.F.R. part 800 regulations in effect on the date upon which this MOA is fully executed, and any other consulting parties identified later in time.
3. In accordance with Section 304 of the NHPA and the 36 C.F.R. part 800 regulations in effect on the date upon which this MOA is fully executed, INDOT and its consultants shall ensure that sensitive information regarding the nature and location of human remains and grave goods, and the location, character, and ownership of archaeological sites is kept confidential from the public.
4. In ensuring that any human remains and grave goods identified are treated in a sensitive, respectful, and careful manner, INDOT shall be guided by the Memorandum of Understanding Among The Federal Highway

Administration, Indiana State Historic Preservation Office, Indiana Department of Transportation, and Federally Recognized Tribes Interested in Indiana Lands Regarding Tribal Consultation Requirements for the Indiana Federal Transportation Program ("Tribal MOU") (Attachment D), the Council's "Policy Statement Regarding Treatment of Human Remains and Grave Goods" (February 23, 2007), the Native American Graves Protections and Repatriation Act ("NAGPRA") regulations set forth in 43 C.F.R. part 10, and other guidelines as appropriate.

5. In the event that previously unreported and unanticipated artifacts or human remains (including funerary objects, sacred objects, and objects of cultural patrimony) are found during construction activities, FHWA, in coordination with INDOT, will follow the procedures outlined in Stipulation III(C) of the Tribal MOU.
6. Modification or modifications ("modifications") to the Project which fall outside of the archaeological APE shall be subject to archaeological identification and evaluation and assessment per Stipulations III.B. and III.C. If FHWA determines that the modifications have the potential to cause adverse effects on archaeological resources, then FHWA shall treat the archaeological resource in accordance with Stipulation III.E.
7. Any dispute regarding the report(s) shall be resolved in accordance with Stipulation IV.A.

## **B. Identification & Evaluation**

1. Before commencing ground-disturbing activities in the Project archaeological APE, INDOT shall complete the identification and evaluation of archaeological properties in accordance with applicable Federal and State standards and guidelines listed in Stipulations I and III.A.
2. INDOT and/or its consultants shall investigate any additional locations where ground-disturbing activities are proposed or where they may occur within temporary easements and permanent right of way.
3. INDOT shall prepare and distribute a final Identification and Evaluation report in accordance with Stipulations I and III.A.
4. Upon completion of the evaluation, FHWA shall follow the procedures set forth in the 36 C.F.R. part 800 regulations in effect on the date upon which this MOA is fully executed which shall include updated documentation described in those regulations, if it is determined that no historic properties shall be affected.
5. If FHWA and the Indiana SHPO agree that any archaeological resources identified are not NRHP eligible, then no further action is necessary under

the terms of this MOA and FHWA's responsibilities under Section 106 are fulfilled.

6. If FHWA determines that any of the NRHP criteria are met and the Indiana SHPO agrees, the archaeological resource shall be considered eligible for the NRHP and treated in accordance with Stipulations III.C - III.E.
7. If FHWA and the Indiana SHPO do not agree on NRHP eligibility, FHWA shall follow the procedures identified in accordance with Stipulation IV.A.

### **C. Assessment of Effects**

1. In consultation with the Indiana SHPO, Federally recognized Indian Tribes that may ascribe traditional cultural and religious significance to affected properties, and other parties whom FHWA deems appropriate, FHWA shall determine if the North Split Project shall adversely affect archeological properties determined eligible for inclusion in the NRHP pursuant to the 36 C.F.R. part 800 regulations in effect on the date upon which this MOA is fully executed.
2. If, in consultation with the Indiana SHPO, Federally recognized Indian Tribes that may ascribe traditional cultural and religious significance to affected properties, and other parties whom FHWA deems appropriate, FHWA determines the Project may adversely affect NRHP-eligible archeological properties, then FHWA shall make reasonable efforts to avoid or minimize the adverse effect. If, after this consultation, FHWA determines it is not possible to avoid or minimize adverse effects, then FHWA shall treat the archaeological resource in accordance with Stipulation III.E. of the MOA.
3. Any dispute regarding the determination of effects on NRHP-eligible archaeological properties shall be resolved in accordance with applicable Federal and State standards and guidelines listed in Stipulation IV.B.

### **D. Additional Investigations**

1. All archaeological investigations shall be conducted according to applicable Federal and State standards and guidelines listed in Stipulations I and III.A
2. To maximize the opportunity to avoid adverse effects, the required archaeological investigations shall be conducted as soon as practicable upon securing the appropriate rights to access property.
3. INDOT, in consultation with the Indiana SHPO and other parties deemed appropriate by INDOT, shall take reasonable measures to avoid

disinterment and disturbance to human remains and grave goods of religious and cultural significance to Native Americans, including investigations associated with modifications of the North Split Project.

4. Upon completion of any additional investigations, FHWA shall complete the identification and evaluation of archaeological resources for inclusion in the NRHP in accordance with applicable Federal and State standards and guidelines in consultation with the Indiana SHPO and appropriate consulting parties and federally recognized Indian Tribes.

#### **E. Treatment**

1. If FHWA, in consultation with the Indiana SHPO, Federally recognized Indian Tribes that may ascribe traditional cultural and religious significance to affected properties, and other parties whom FHWA deems appropriate, determines that an adverse effect cannot be avoided or minimized, then FHWA shall develop and implement a Treatment Plan(s), as part of the above consultation, to mitigate the adverse effects to an archeological resource on a site-by-site basis. The implementation of the Treatment Plan(s) must be completed for each site prior to the initiation of any North Split Project construction activities within a segment that could affect that site.

### **IV. ADMINISTRATIVE PROVISIONS**

#### **A. Monitoring of Compliance**

1. Progress reports detailing implementation of the measures stipulated within this MOA and providing advanced notice of milestones, such as approval of design plans and initiation of construction activities, shall be submitted to signatories and concurring parties every six (6) months, until all phases of the North Split Project are complete.
2. The first progress report shall be distributed within six (6) months following execution of this MOA.
3. The progress reports shall identify the status of activities for each stipulation outlined in this MOA.
4. A consulting party meeting will be held to inform consulting parties of the status of activities and evaluate compliance with the MOA within 30 days of distribution of each progress report. The consulting party meetings could be combined with those stipulated in II.A regarding review of the landscape and side slope plans.

## **B. Dispute Resolution**

1. If the Indiana SHPO, any invited signatory, or concurring party to this MOA should object in writing to FHWA regarding any action carried out or proposed with respect to the North Split Project or implementation of this MOA, then FHWA shall consult with the objecting party to resolve this objection. If after such consultation FHWA determines that the objection cannot be resolved through consultation, then FHWA shall forward all documentation relevant to the objection to the Council, including FHWA's proposed response to the objection. Within forty-five (45) days after receipt of all pertinent documentation, the Council shall exercise one of the following options:
  - a) Provide FHWA with a staff-level recommendation, which FHWA shall take into account in reaching a final decision regarding its response to the objection; or
  - b) Notify FHWA that the objection will be referred for formal comment pursuant to 36 C.F.R. Section 800.7(c), and proceed to refer the objection and comment. FHWA shall take into account the Council's comments in reaching a final decision regarding its response to the objection.
2. If comments or recommendations from the Council are provided in accordance with this stipulation, then FHWA shall take into account any Council comment or recommendations provided in accordance with this stipulation with reference only to the subject of the objection. FHWA's responsibility to carry out all actions under the MOA that are not the subjects of the objection shall remain unchanged.

## **C. Post-Review Discovery**

In the event that one or more historic properties - other than the historic properties listed above - are discovered or that unanticipated effects on historic properties are found during the implementation of this MOA, FHWA shall follow the procedures specified in 36 C.F.R. Section 800.13, and Stipulation III(C) of the Tribal MOU, as well as IC 14-21-1-27 and IC 14-21-1-29, by immediately ceasing all project-related ground-disturbing activities within at least one-hundred (100) feet of the discovery and informing the Indiana SHPO, the Miami Tribe of Oklahoma, and any other tribe whose ancestral homeland is included with the area where the post-review discovery occurred according to Appendix A of the Tribal MOU of such unanticipated discoveries or effects within two (2) business days. Any necessary archaeological investigations will be conducted according to the provisions of IC 14-21-1 and 312 IAC 21, and the most current Guidebook for Indiana Historic Sites and Structures Inventory – Archaeological Sites.

#### **D. Human Remains**

In ensuring that any human remains and grave goods identified are treated in a sensitive, respectful, and careful manner, INDOT shall be guided by the Tribal MOU (Attachment D), the Council's "Policy Statement Regarding Treatment of Human Remains and Grave Goods" (February 23, 2007), the Native American Graves Protections and Repatriation Act ("NAGPRA") regulations set forth in 43 C.F.R. part 10, and other guidelines as appropriate.

Additionally, in the event that previously unreported and unanticipated artifacts or human remains (including funerary objects, sacred objects, and objects of cultural patrimony) are found during construction activities, FHWA, in coordination with INDOT, will follow the procedures outlined in Stipulation III(C) of the Tribal MOU.

#### **E. Modifications (“Modifications”) of the Project with Respect to Aboveground Resources**

If the North Split Project is modified after this MOA has been executed, then FHWA shall review the North Split Project Modifications and proceed by complying with IV.C.1. and, if appropriate, IV.C.2.

1. FHWA shall determine whether any Modifications have the potential to cause adverse effects on aboveground resources, if any are found to exist within the area in which the Modifications may cause effects.
  - a) If FHWA determines that the project Modifications do not have the potential to cause adverse effects on aboveground resources, then FHWA or INDOT shall document that determination in its records, and no further review or consultation with respect to those Modifications’ effects on aboveground properties is required for purposes of this MOA.
  - b) If FHWA determines that the project Modifications have the potential to adversely affect aboveground resources, then FHWA or INDOT shall proceed to review the Modifications in accordance with Stipulation IV.E.2.
  - c) Prior to determining whether the project Modifications have the potential to adversely affect aboveground resources, FHWA may submit, for the Indiana SHPO’s files, copies of reports generated as a result of Modifications or may request the opinion of the Indiana SHPO about identification, evaluation, effects assessment or avoidance, minimization or mitigation, or any other issue under Federal or State preservation or archaeological law pertaining to the Project, provided that such a request for an opinion is not substituted for formal consultation under Stipulation IV.E.2. The

Indiana SHPO shall have thirty (30) days to respond to such a request.

2. If FHWA determines, in consultation with the Indiana SHPO, that project Modifications have the potential to cause adverse effects on aboveground resources, then FHWA shall re-open the Section 106 consultation process in accordance with the 36 C.F.R. part 800 regulations that are in effect on the date upon which this MOA has been signed by the last of all required and invited signatories.
  - a) The re-opened consultation shall occur with regard only to:
    - (i) Adverse effects assessment, or avoidance, minimization or mitigation of adverse effects related to the project Modifications, for previously evaluated aboveground properties within the APE, or:
    - (ii) Identification, evaluation, adverse effects assessment, or avoidance, minimization or mitigation of adverse effects related to the project Modifications, for aboveground properties within the area added to the APE, as a result of the expansion of the APE.
  - b) FHWA shall consult with the consulting parties listed in Attachment B and other parties, as appropriate, except to the extent that the public disclosure of information about resources is withheld or limited for archaeological resources.
  - c) FHWA shall issue a new finding, supported either by revised documentation or by an update to the documentation, regardless of whether additional or different kinds of adverse effects have been found to result from the Modifications of the project.

#### **F. Amendment**

Any signatory to this MOA may request that it be amended, whereupon the parties shall consult to consider the proposed amendment. 36 C.F.R. 800.6(c)(7) shall govern the execution of any such amendment.

#### **G. Duration**

This MOA shall expire on December 31, 2030, unless amended and extended pursuant to Stipulation IV.F., or terminated pursuant to Stipulation IV.H. In such an event, FHWA shall so notify the parties to this MOA and, if it chooses to continue with the North Split Project, then it shall reinitiate review of the North Split Project in accordance with 36 C.F.R. Sections 800.3 through 800.7.

## **H. Termination**

1. Any signatory to this MOA may terminate it by providing thirty (30) days notice to the other parties, provided that the parties shall consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination.
2. In the event of termination, FHWA shall comply with 36 C.F.R. Sections 800.3 through 800.7 with regard to the review of the North Split Project.

The execution of this MOA by FWHA, INDOT, the Council, the Indiana SHPO, the Benjamin Harrison Presidential Site, and Keep Indianapolis Beautiful, Inc., and the implementation of its terms evidence that FHWA has afforded the Council an opportunity to comment on the North Split Project and its effect on historic properties and that FHWA has taken into account the effects of the North Split Project on historic properties.

### **SIGNATORIES:**

FEDERAL HIGHWAY ADMINISTRATION  
INDIANA STATE HISTORIC PRESERVATION OFFICER  
ADVISORY COUNCIL ON HISTORIC PRESERVATION

### **INVITED SIGNATORIES:**

INDIANA DEPARTMENT OF TRANSPORTATION  
BENJAMIN HARRISON PRESIDENTIAL SITE  
KEEP INDIANAPOLIS BEAUTIFUL, INC.

### **(Optional) CONCURRING PARTIES:**

- Indiana Landmarks
- National Park Service, Midwest Region
- Historic Urban Neighborhoods of Indianapolis
- Indianapolis Historic Preservation Commission
- Indianapolis Department of Metropolitan Development
- Indianapolis Department of Public Works
- Old Northside Neighborhood Association
- Saint Joseph Historic Neighborhood Association
- Chatham-Arch Neighborhood Association
- Lockerbie Square People's Club
- Windsor Park Neighborhood Association
- Holy Cross Neighborhood Association
- Cottage Home Neighborhood Association
- Cottage Home BOD
- Massachusetts Avenue Merchants Association
- Mayor's Neighborhood Advocate, Area 10
- Hendricks Commercial Properties
- NESCO Land Use

- Fountain Square Neighborhood Association
- John Boner Neighborhood Centers
- Patricia and Charles Perrin (property owners)
- North Square Neighborhood Association
- Luke Leising (property owner)
- American Institute of Architects
- Fletcher Plan Neighborhood Association
- Southeast Neighborhood Land Use Committee
- Martindale Brightwood Community Development Corporation
- Interstate Business Group
- National Trust for Historic Preservation
- Sandy Cummings (property owner)
- Old Near Westside/Ransom Place
- Riley Area Development Corporation
- Miami Tribe of Oklahoma
- Rethink 65/70 Coalition

**MEMORANDUM OF AGREEMENT  
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,  
THE INDIANA DEPARTMENT OF TRANSPORTATION,  
THE INDIANA STATE HISTORIC PRESERVATION OFFICER, AND  
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION  
REGARDING THE I-65/I-70 NORTH SPLIT  
INTERCHANGE RECONSTRUCTION PROJECT  
IN INDIANAPOLIS, CENTER TOWNSHIP, MARION COUNTY, INDIANA  
DES. NOS. 1592385 and 1600808**

**SIGNATORY**

FEDERAL HIGHWAY ADMINISTRATION

**MICHELLE B ALLEN**

Digitally signed by MICHELLE B

ALLEN

Date: 2020.05.27 14:33:37 -04'00'

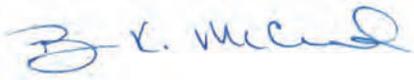
By: \_\_\_\_\_

Mayela Sosa, Division Administrator

**MEMORANDUM OF AGREEMENT  
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DES. NOS. 1592385 and 1600808**

**SIGNATORY**

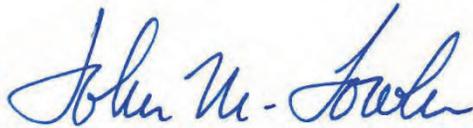
INDIANA STATE HISTORIC PRESERVATION OFFICER

By:  Date: 5-27-20  
Beth K. McCord, Deputy State Historic Preservation Officer

**MEMORANDUM OF AGREEMENT  
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IN INDIANAPOLIS, CENTER TOWNSHIP, MARION COUNTY, INDIANA  
DES. NOS. 1592385 and 1600808**

**SIGNATORY**

ADVISORY COUNCIL ON HISTORIC PRESERVATION



By:

\_\_\_\_\_  
John Fowler, Executive Director

Date: May 29, 2020

**MEMORANDUM OF AGREEMENT  
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INTERCHANGE RECONSTRUCTION PROJECT  
IN INDIANAPOLIS, CENTER TOWNSHIP, MARION COUNTY, INDIANA  
DES. NOS. 1592385 and 1600808**

**INVITED SIGNATORY**

INDIANA DEPARTMENT OF TRANSPORTATION

By:



Laura Hilden, Environmental Services Director

Date:

5/19/2020

**MEMORANDUM OF AGREEMENT  
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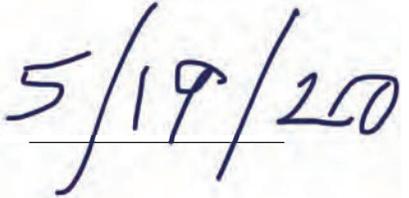
**INVITED SIGNATORY**

BENJAMIN HARRISON PRESIDENTIAL SITE

By:

  
Charles Hyde, President and CEO

Date:

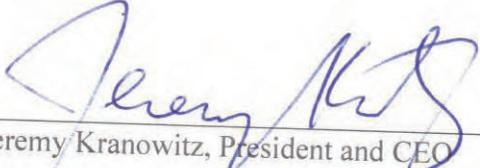


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INTERCHANGE RECONSTRUCTION PROJECT  
IN INDIANAPOLIS, CENTER TOWNSHIP, MARION COUNTY, INDIANA  
DES. NOS. 1592385 and 1600808**

**INVITED SIGNATORY**

KEEP INDIANAPOLIS BEAUTIFUL, INC.

By:

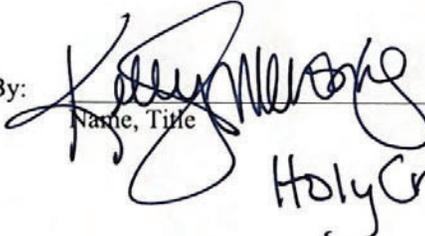
  
\_\_\_\_\_  
Jeremy Kranowitz, President and CEO

Date:

5/20/2020

MEMORANDUM OF AGREEMENT  
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IN INDIANAPOLIS, CENTER TOWNSHIP, MARION COUNTY, INDIANA  
DES. NOS. 1592385 and 1600808

Optional: CONCURRING PARTY

By:  President  
Name, Title  
Holy Cross N.A.

Date: 6/28/20

Attachment A – Area of Potential Effects Map



Attachment B – Consulting Party List

Organization	Contact Name	Title	E-Mail
IDNR-Division of Historic Preservation and Archaeology	Chad Slider	Deputy State Historic Preservation Officer	<a href="mailto:CSlider@dnr.IN.gov">CSlider@dnr.IN.gov</a>
IDNR-Division of Historic Preservation and Archaeology	Wade Tharp	Archaeologist	<a href="mailto:WTharp1@dnr.IN.gov">WTharp1@dnr.IN.gov</a>
Indiana Landmarks	Mark Dollase	Vice President of Preservation Services	<a href="mailto:mdollase@indianalandmarks.org">mdollase@indianalandmarks.org</a>
Indiana Landmarks	Marsh Davis	President	<a href="mailto:mdavis@indianalandmarks.org">mdavis@indianalandmarks.org</a>
National Park Service, Midwest Region	Alesha Cerny	Historian/Cultural Resources	<a href="mailto:alesha_cerny@nps.gov">alesha_cerny@nps.gov</a>
Historic Urban Neighborhoods of Indianapolis	Marjorie Kienle		<a href="mailto:mlkienle@indy.rr.com">mlkienle@indy.rr.com</a>
Historic Urban Neighborhoods of Indianapolis	Garry Chilluffo		<a href="mailto:garry@chilluffo.com">garry@chilluffo.com</a>
Historic Urban Neighborhoods of Indianapolis/Indiana Landmarks	Chad Lethig	Secretary/Indianapolis Preservation Coordinator	<a href="mailto:clethig@indianalandmarks.org">clethig@indianalandmarks.org</a>
Indianapolis Historic Preservation Commission/City of Indianapolis	Meg Purnsley	Administrator	<a href="mailto:Meg.Purnsley@indy.gov">Meg.Purnsley@indy.gov</a>
Indianapolis Department of Metropolitan Development	Brad Beaubien	Principal Planner	<a href="mailto:Brad.Beaubien@indy.gov">Brad.Beaubien@indy.gov</a>
Indianapolis Department of Public Works	Melody Park	Chief Engineer	<a href="mailto:Melody.Park@indy.gov">Melody.Park@indy.gov</a>
Old Northside Neighborhood Association	Garry Elder	President	<a href="mailto:eldergarry@sbcglobal.net">eldergarry@sbcglobal.net</a>
Old Northside Neighborhood Association	Nancy Inui		<a href="mailto:nsinui@ameritech.net">nsinui@ameritech.net</a>
Old Northside Neighborhood Association	Travis Barnes		<a href="mailto:travis@hoteltangowhiskey.com">travis@hoteltangowhiskey.com</a>
Benjamin Harrison Presidential Site	Charles A. Hyde	President and CEO	<a href="mailto:chyde@bhpsite.org">chyde@bhpsite.org</a>
St. Joseph Historic Neighborhood Association	Mark Godley	President	<a href="mailto:mgodley@chestnut.org">mgodley@chestnut.org</a>
Chatham Arch Neighborhood Association	Ken Avidor	Board Member	<a href="mailto:ken.avidor@gmail.com">ken.avidor@gmail.com</a>

Organization	Contact Name	Title	E-Mail
Lockerbie Square People's Club	Jeffrey Christoffersen		<a href="mailto:jeff@thechristoffersens.com">jeff@thechristoffersens.com</a>
Windsor Park Neighborhood Association, Inc.	Jen Eamon	President	<a href="mailto:wearewindsorpark@gmail.com">wearewindsorpark@gmail.com</a>
Holy Cross Neighborhood Association	Jen Higginbotham		<a href="mailto:Jen_Higginbotham@yahoo.com">Jen_Higginbotham@yahoo.com</a>
Holy Cross Neighborhood Association	Pat Dubach		<a href="mailto:pdubach@redev.net">pdubach@redev.net</a>
Holy Cross Neighborhood Association	Kelly Wensing		<a href="mailto:kellywensing@gmail.com">kellywensing@gmail.com</a>
Holy Cross Neighborhood Association	Jason Rowley		<a href="mailto:jrowley@hanson-inc.com">jrowley@hanson-inc.com</a>
Cottage Home Neighborhood Association	Crystal Rehder	President, Cottage Home Neighborhood Indianapolis	<a href="mailto:cottagehomeneighborhood@gmail.com">cottagehomeneighborhood@gmail.com</a>
Cottage Home BOD	Jim Jessee		<a href="mailto:jamesjessee102@gmail.com">jamesjessee102@gmail.com</a>
Massachusetts Avenue Merchants Association	Meg Storrow		<a href="mailto:storrow@storrowkinsella.com">storrow@storrowkinsella.com</a>
Mayor's Neighborhood Advocate, Area 10	Ruth Morales		<a href="mailto:ruth.morales@indy.gov">ruth.morales@indy.gov</a>
Hendricks Commercial Properties	Gavin Thomas	Vice President of Development	<a href="mailto:Gavin.Thomas@hendricksgroup.net">Gavin.Thomas@hendricksgroup.net</a>
NESCO Land Use	David Hittle		<a href="mailto:davidhittle@gmail.com">davidhittle@gmail.com</a>
Fountain Square Neighborhood Association	Desiree Calderella	President	<a href="mailto:fsna1835@gmail.com">fsna1835@gmail.com</a>
John Boner Neighborhood Centers	Jon Berg	IndyEast Promise Zone Director	<a href="mailto:jberg@jbncenters.org">jberg@jbncenters.org</a>
Property Owners	Patricia and Charles Perrin		<a href="mailto:pperrin@indy.rr.com">pperrin@indy.rr.com</a>
North Square Neighborhood Association	Jordan Ryan		<a href="mailto:jordanblairryan@gmail.com">jordanblairryan@gmail.com</a>
Keep Indianapolis Beautiful, Inc.	Joe Jarzen	Vice President of Program Strategy	<a href="mailto:jjarzen@kibi.org">jjarzen@kibi.org</a>
Property Owner	Luke Leising		<a href="mailto:luke@guidondesign.com">luke@guidondesign.com</a>
American Institute of Architects	Mark Beebe		<a href="mailto:mbeebe@lancerbeebe.com">mbeebe@lancerbeebe.com</a>

Organization	Contact Name	Title	E-Mail
Fletcher Place Neighborhood Association, Inc.	Glenn Blackwood		<a href="mailto:glennblackwood@gmail.com">glennblackwood@gmail.com</a>
Southeast Neighborhood Land Use Committee	Jim Lingenfelter		<a href="mailto:jimlingenfelter@five2fivedesign.com">jimlingenfelter@five2fivedesign.com</a>
Martindale Brightwood Community Development Corporation	Amina Pierson	Executive Director	<a href="mailto:apierson@mbcdc.org">apierson@mbcdc.org</a>
Interstate Business Group	Paul Knapp		<a href="mailto:pknapp@yandl.com">pknapp@yandl.com</a>
National Trust for Historic Preservation	Betsy Merritt	Deputy General Council	<a href="mailto:emerritt@savingplaces.org">emerritt@savingplaces.org</a>
Advisory Council on Historic Preservation	Sarah Stokely	Program Analyst	<a href="mailto:sstokely@achp.gov">sstokely@achp.gov</a>
Advisory Council on Historic Preservation	Mandy Ranslow	FHWA Liaison/Program Analyst	<a href="mailto:mranslow@achp.gov">mranslow@achp.gov</a>
St. Joseph Neighborhood Property Owner	Sandy Cummings		<a href="mailto:sandycummings2003@yahoo.com">sandycummings2003@yahoo.com</a>
Old Near Westside/Ransom Place	Denise Halliburton		<a href="mailto:d_halliburton@hotmail.com">d_halliburton@hotmail.com</a>
Old Northside Neighborhood Association	Hilary Barnes		<a href="mailto:hitalyor09@gmail.com">hitalyor09@gmail.com</a>
Riley Area Development Corporation	Chelsea Humble	North Mass Program Manager	<a href="mailto:chelsea.humble@rileyarea.org">chelsea.humble@rileyarea.org</a>
<b>Tribes</b>			
Miami Tribe of Oklahoma	Diane Hunter	THPO	<a href="mailto:dhunter@miamination.com">dhunter@miamination.com</a>

Attachment C – North Split Aesthetic Design Guidelines



# ATTACHMENT 6-1 NORTH SPLIT

*AESTHETIC DESIGN GUIDELINES*



INDIANA DEPARTMENT OF TRANSPORTATION  
I-65/I-70 NORTH SPLIT PROJECT  
FEBRUARY 25, 2020

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

Request for Proposals  
Technical Provisions  
Addendum #3

Attachment C45

Page 33 of 132



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- 23 Sound Barriers
- 24 Fencing
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- 38 Landscape

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Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# COLOR

## CHART:

Color A1: RGB: 128, 128, 128	Color A2: RGB: 204, 204, 204	Color A3: RGB: 240, 240, 240
--	--	--

## APPLICATION:

### CONCRETE (A)

- Bridge Monuments, Piers & Caps
- Bridge Rails & Parapets
- Sign Structure Supports
- Retaining Walls
- Bridge Abutment Walls

Color B1: RGB: 187, 179, 159	Color B2: RGB: 252, 219, 181
--	--

### CONCRETE (B)

- Noise Barrier Panels, Caps & Posts

Color C:  
RGB: 55, 95, 95

### CONCRETE & STEEL (C)

- Bridge Beam/Girder  
(Color shall be applied at locations where metallizing is not required)

Color D:  
RGB: 65, 64, 66

### METALS (D)

- Ornamental Lights
- Sign Lettering
- Noise Barrier Posts

Color E:  
RGB: 219, 195, 135

### ACCENT (E)

- Wall Detailing
- Corner Monument Detailing
- Relief Texture

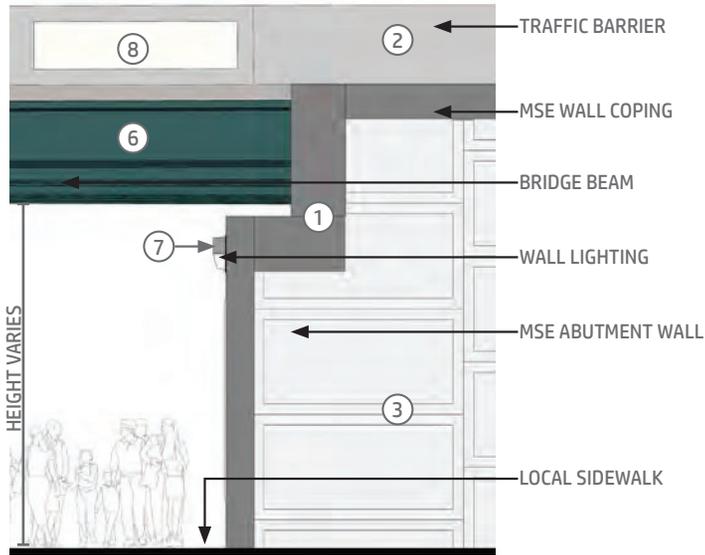
RGB  
STANDS  
FOR:  
RED (R)  
GREEN (G)  
BLUE (B)

# STANDARD ABUTMENT

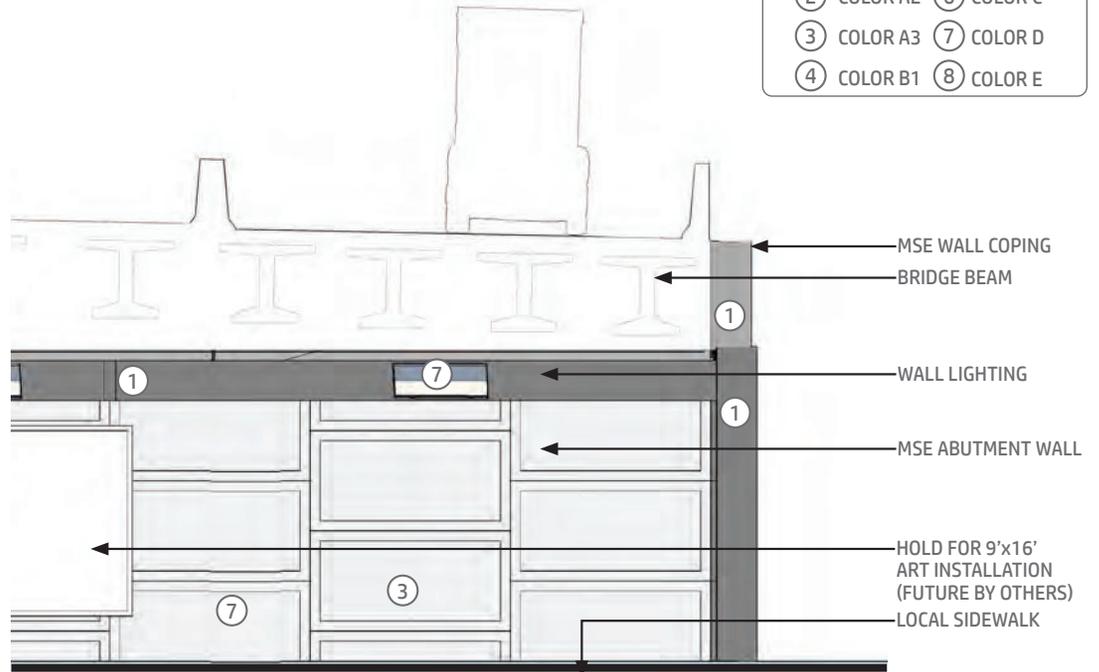
NOTE: Number of down-lighting and column lighting shall be determined in accordance with the technical provisions and project standards.

**COLOR LEGEND: SEE COLOR SECTION**

① COLOR A1	⑤ COLOR B2
② COLOR A2	⑥ COLOR C
③ COLOR A3	⑦ COLOR D
④ COLOR B1	⑧ COLOR E



**END ELEVATION (TYPICAL)**



**CROSS SECTION ENLARGEMENT (TYPICAL)**



**CROSS SECTION ELEVATION (TYPICAL)**

## Abutment Walls

Des. Nos. 1592385 & 1600808

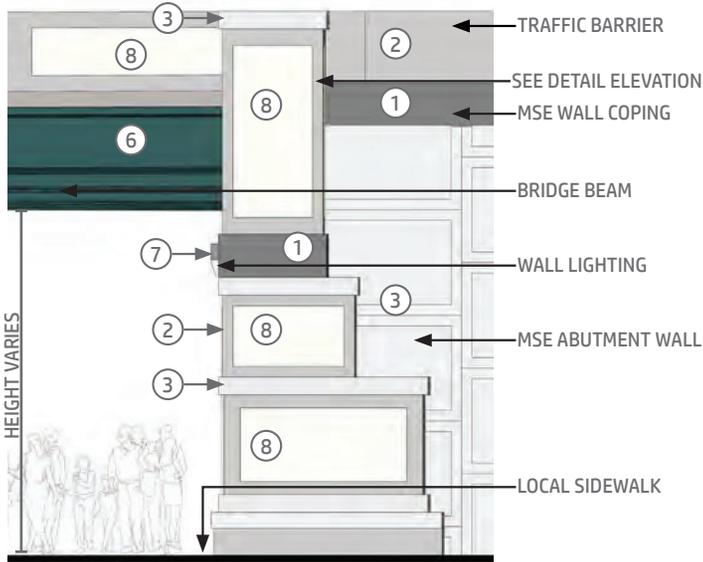
Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# MINOR MONUMENT ABUTMENT

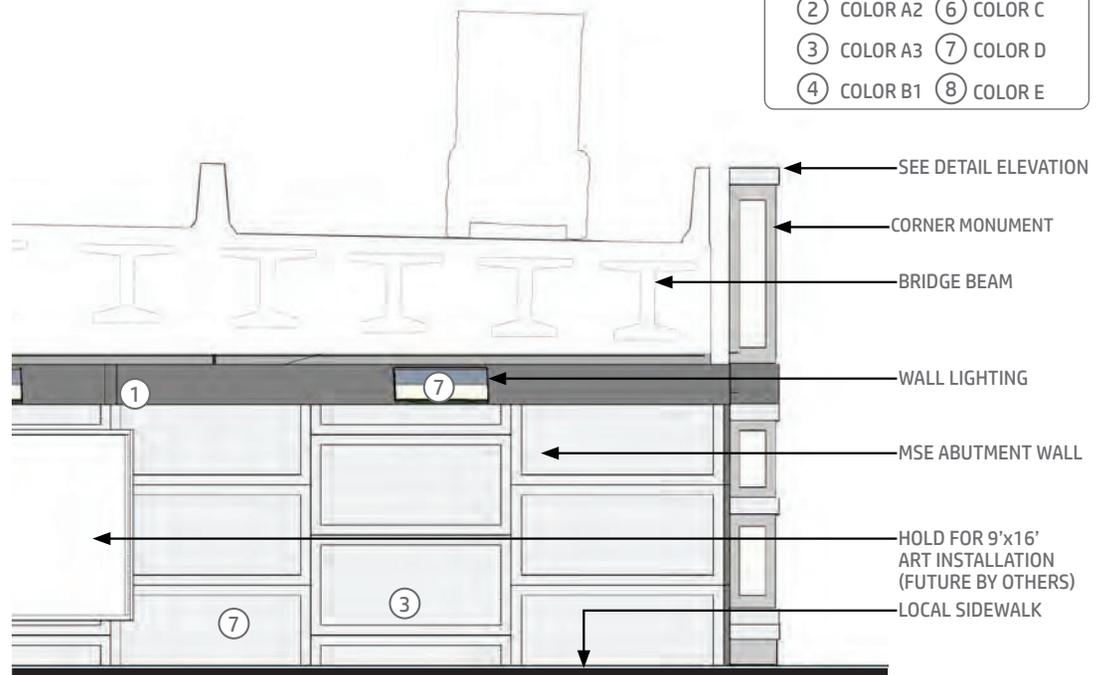
NOTE: Number of down-lighting and column lighting shall be determined in accordance with the technical provisions and project standards.

COLOR LEGEND: SEE COLOR SECTION

- ① COLOR A1    ⑤ COLOR B2
- ② COLOR A2    ⑥ COLOR C
- ③ COLOR A3    ⑦ COLOR D
- ④ COLOR B1    ⑧ COLOR E



END ELEVATION (TYPICAL)



CROSS SECTION ENLARGEMENT (TYPICAL)



CROSS SECTION ELEVATION (TYPICAL)

## Abutment Walls

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# SCHEMATIC DETAILS

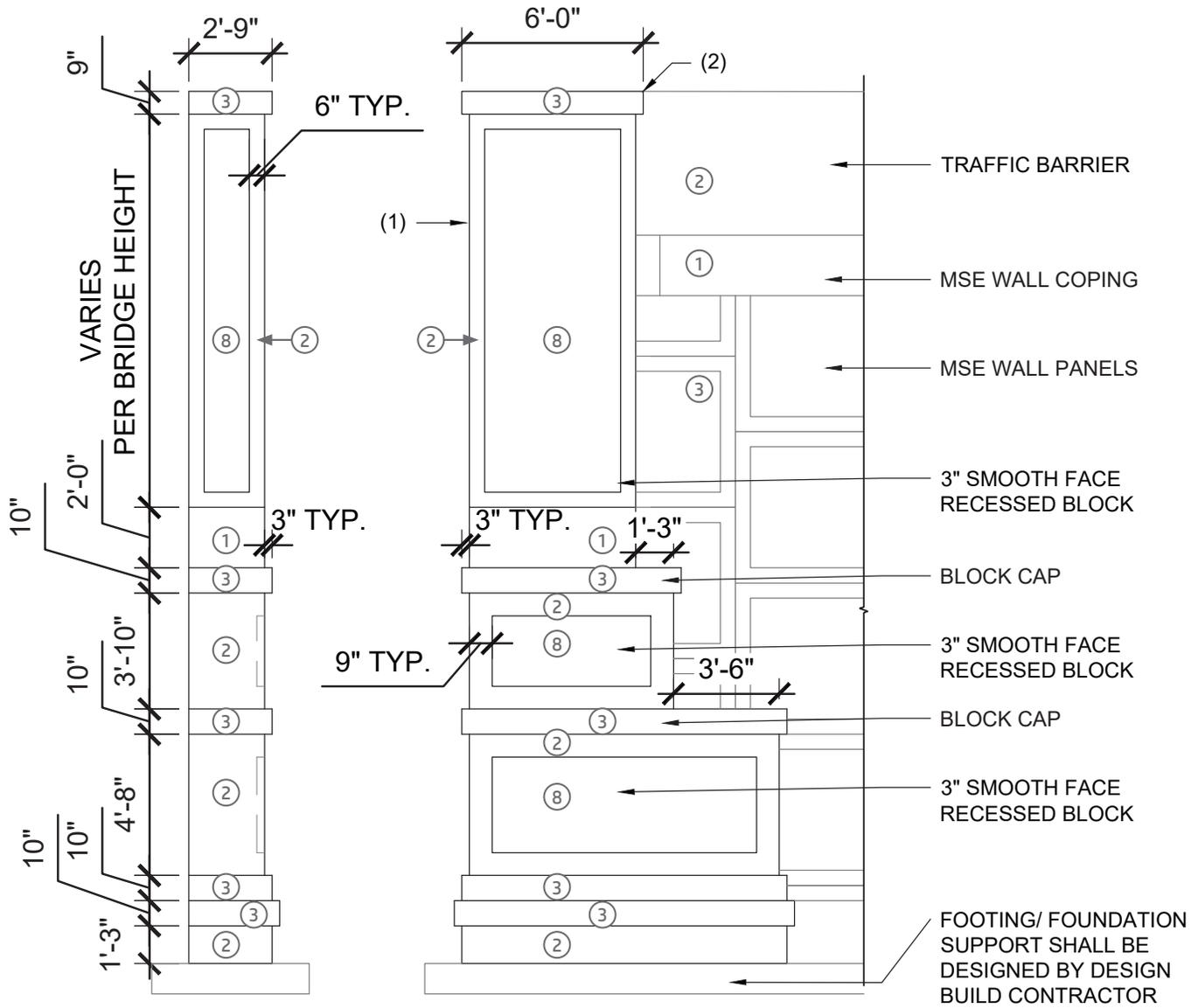
## MINOR MONUMENT ABUTMENT

**COLOR LEGEND: SEE COLOR SECTION**

① COLOR A1	⑤ COLOR B2
② COLOR A2	⑥ COLOR C
③ COLOR A3	⑦ COLOR D
④ COLOR B1	⑧ COLOR E

**LEGEND:**  
 (1) MONUMENT FACE SHALL BE FLUSH WITH FRONT FACE OF MSE ABUTMENT WALL PRECAST COPING  
 (2) CAP SHALL BE FLUSH WITH TRAFFIC BARRIER.

**NOTE: STRUCTURAL CONCRETE AND REINFORCING DESIGN AND DETAILING REQUIREMENTS SHALL BE THE RESPONSIBILITY OF THE DESIGN-BUILD CONTRACTOR IN ACCORDANCE WITH THE TECHNICAL PROVISIONS AND PROJECT STANDARDS.**



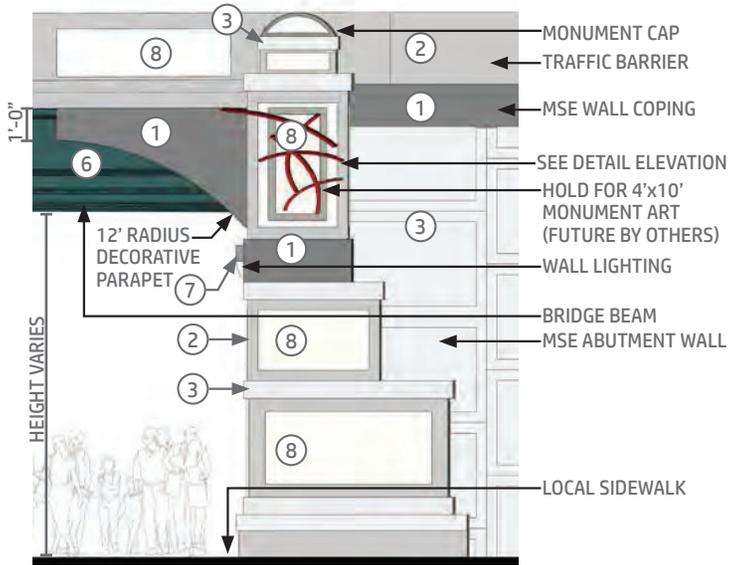
**DETAIL ELEVATION (TYPICAL)**

# MAJOR MONUMENT ABUTMENT

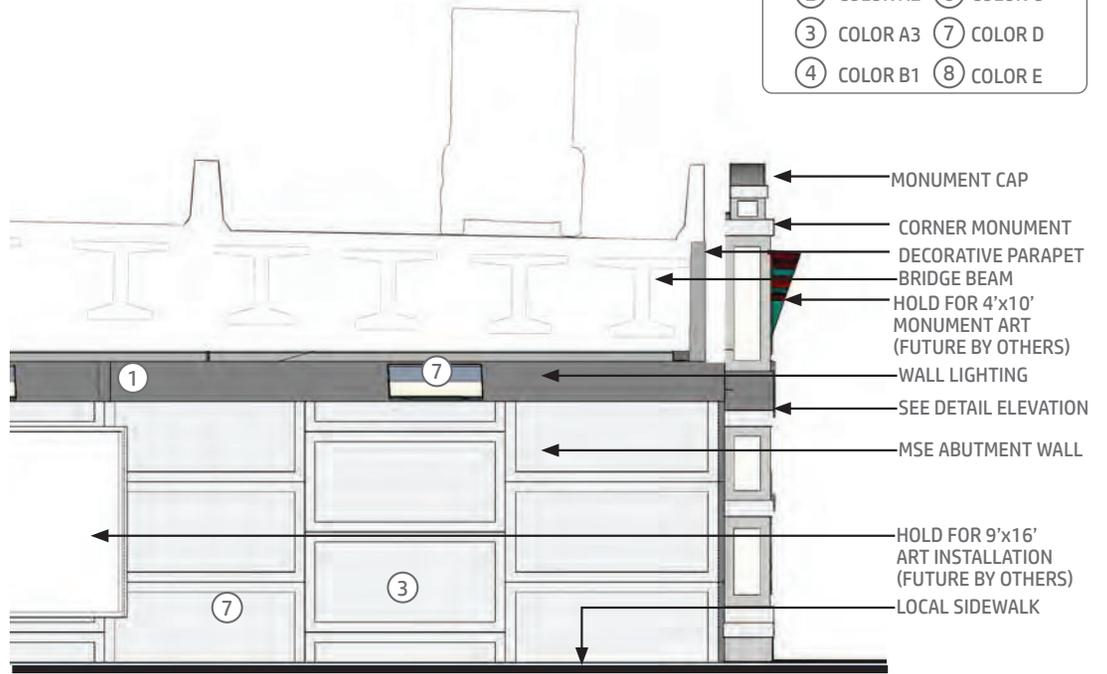
NOTE: Number of down-lighting and column lighting shall be determined in accordance with the technical provisions and project standards.

**COLOR LEGEND: SEE COLOR SECTION**

① COLOR A1	⑤ COLOR B2
② COLOR A2	⑥ COLOR C
③ COLOR A3	⑦ COLOR D
④ COLOR B1	⑧ COLOR E



END ELEVATION (TYPICAL)



CROSS SECTION ENLARGEMENT (TYPICAL)



CROSS SECTION ELEVATION (TYPICAL)

## Abutment Walls

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

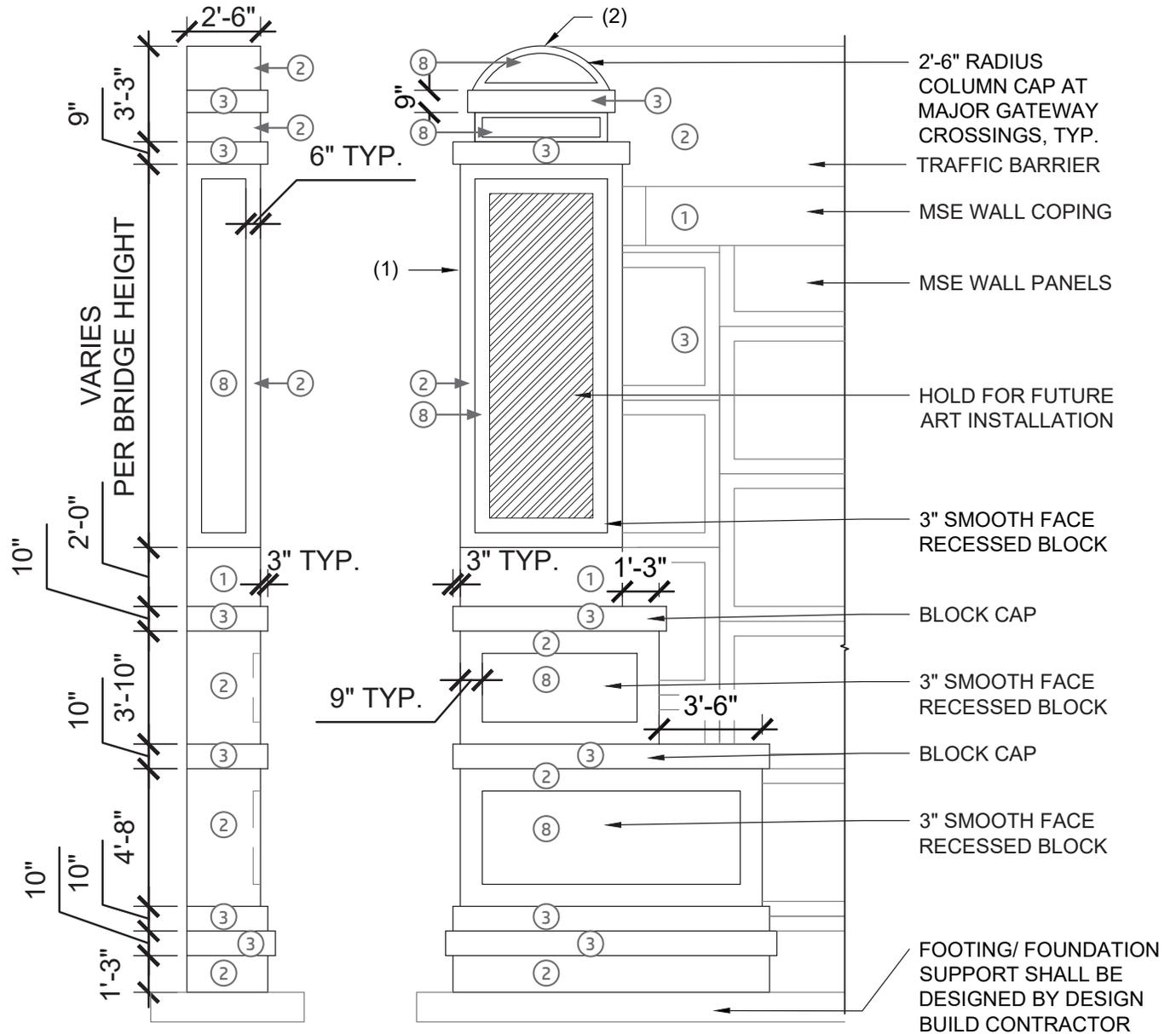
# SCHEMATIC DETAILS

## MAJOR MONUMENT ABUTMENT

**COLOR LEGEND: SEE COLOR SECTION**

① COLOR A1	⑤ COLOR B2
② COLOR A2	⑥ COLOR C
③ COLOR A3	⑦ COLOR D
④ COLOR B1	⑧ COLOR E

**LEGEND:**  
 (1) MONUMENT FACE SHALL BE FLUSH WITH FRONT FACE OF MSE ABUTMENT WALL PRECAST COPING.  
 (2) CAP SHALL BE FLUSH WITH TRAFFIC BARRIER.  
 NOTE: STRUCTURAL CONCRETE AND REINFORCING DESIGN AND DETAILING REQUIREMENTS SHALL BE THE RESPONSIBILITY OF THE DESIGN-BUILD CONTRACTOR IN ACCORDANCE WITH THE TECHNICAL PROVISIONS AND PROJECT STANDARDS.



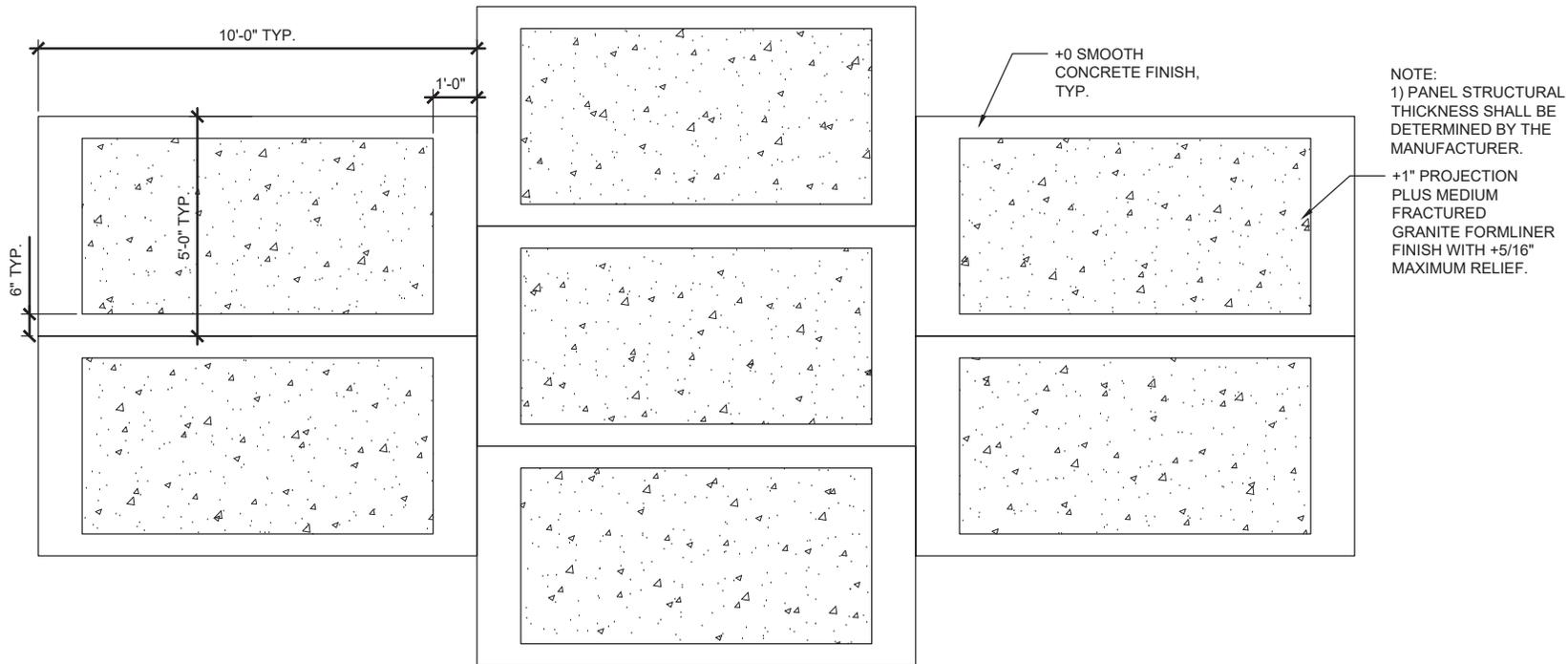
**DETAIL ELEVATION (TYPICAL)**

# RETAINING WALLS

## SCHEMATIC DETAILS



PLAN (TYPICAL)



ELEVATION (TYPICAL)

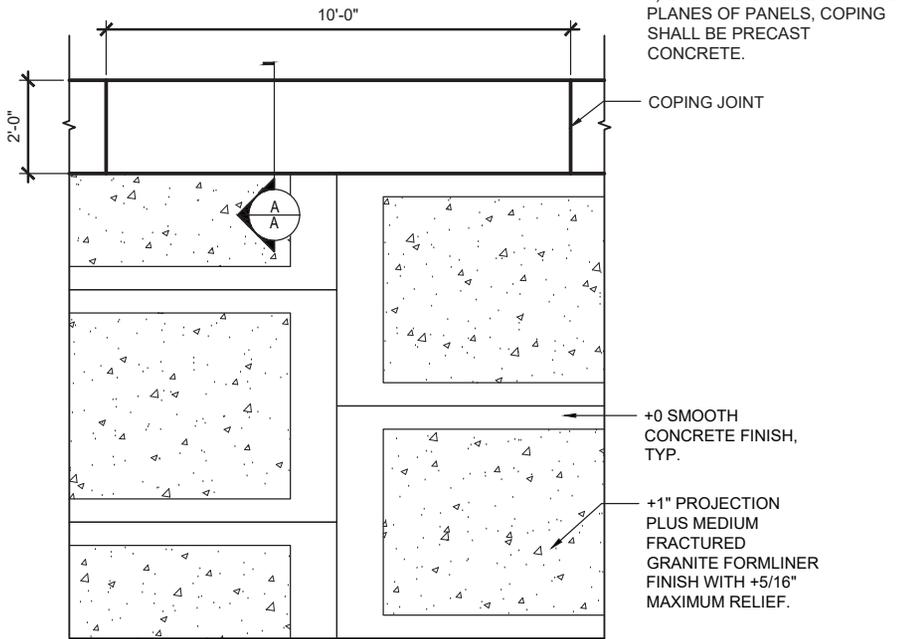
### Retaining Walls

Des. Nos. 1592385 & 1600808

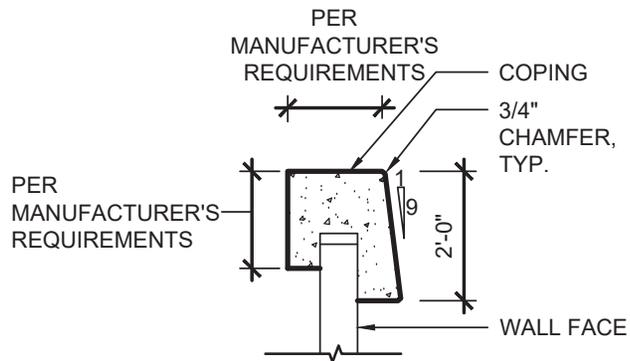
Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# RETAINING WALLS

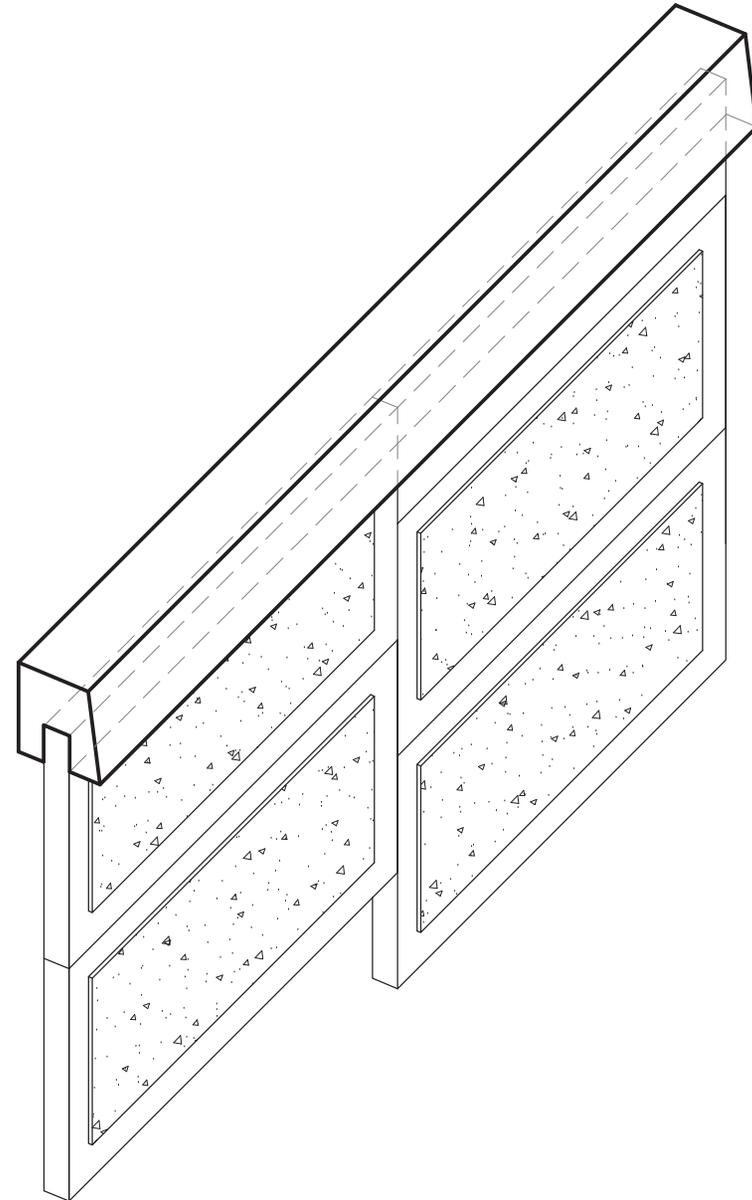
## SCHEMATIC DETAILS



**ELEVATION COPING WITH PANEL(TYPICAL)**



**SECTION A- COPING (TYPICAL)**

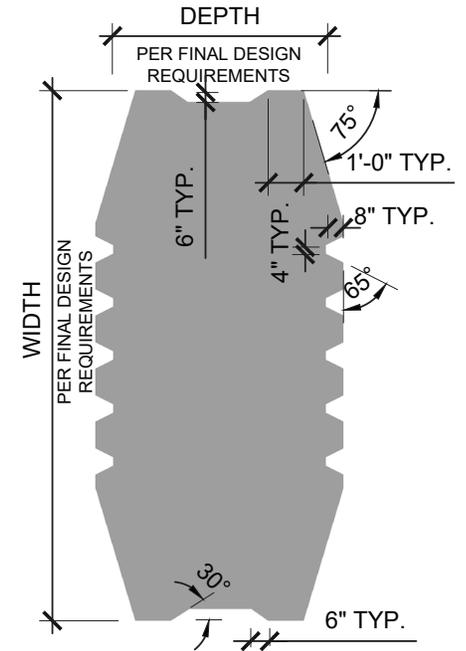
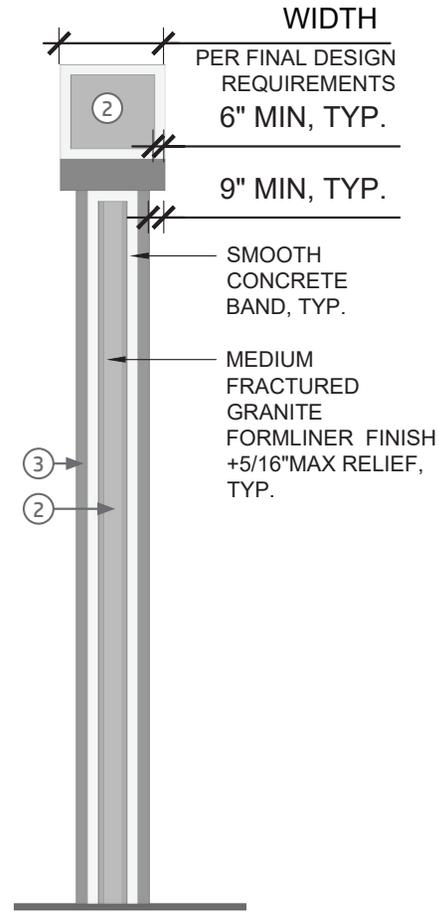
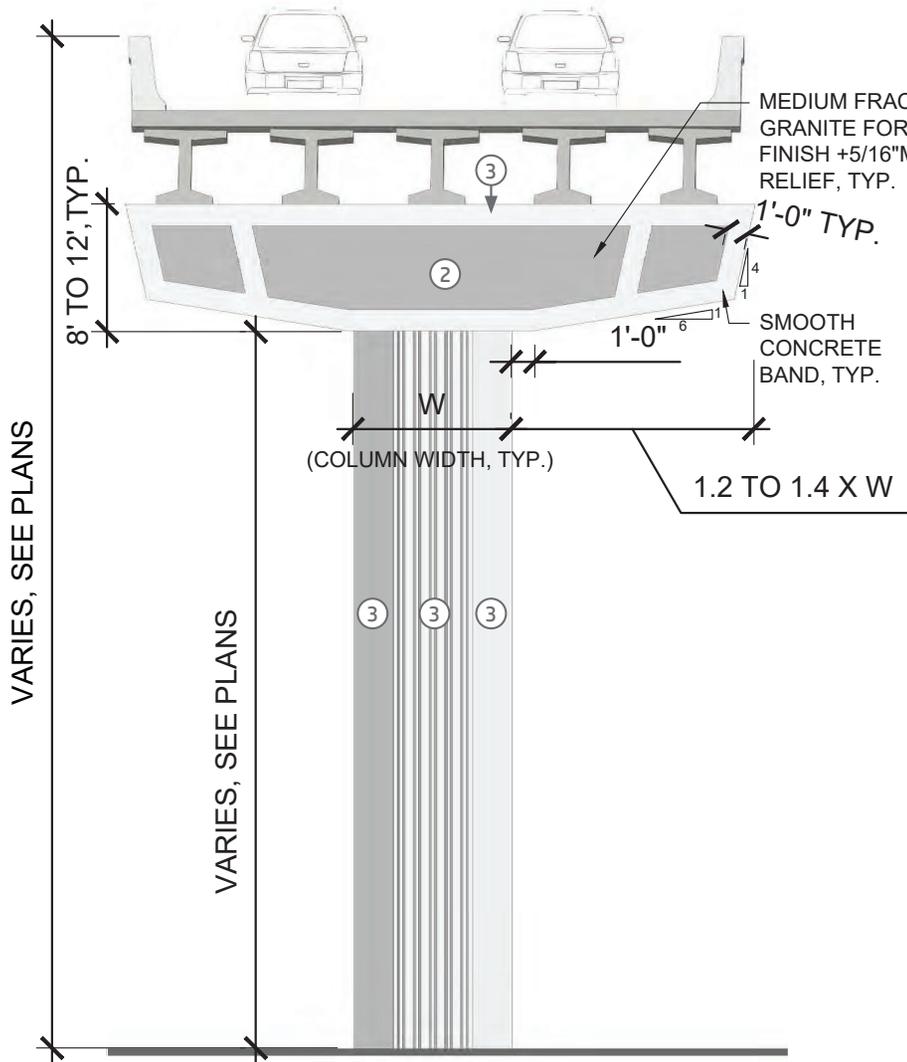


**ISOMETRIC-COPING WITH PANEL (TYPICAL)**

# SINGLE COLUMN

**COLOR LEGEND: SEE COLOR SECTION**

① COLOR A1	⑤ COLOR B2
② COLOR A2	⑥ COLOR C
③ COLOR A3	⑦ COLOR D
④ COLOR B1	⑧ COLOR E



FRONT & SIDE ELEVATION MAXIMUM HEIGHT (TYPICAL)

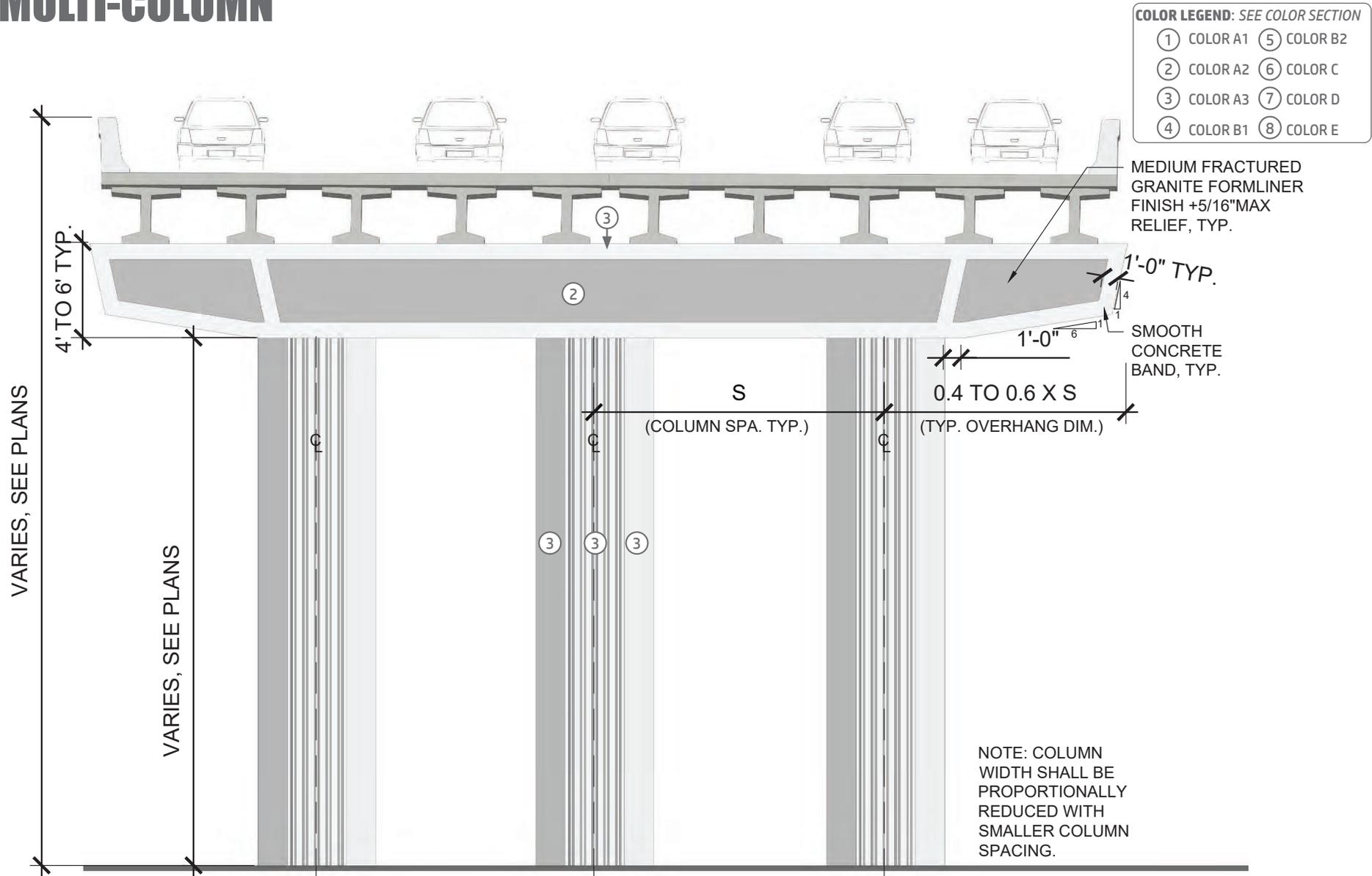
COLUMN CROSS SECTION (TYPICAL)

## Piers

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# MULTI-COLUMN



## FRONT ELEVATION (TYPICAL)

### Piers

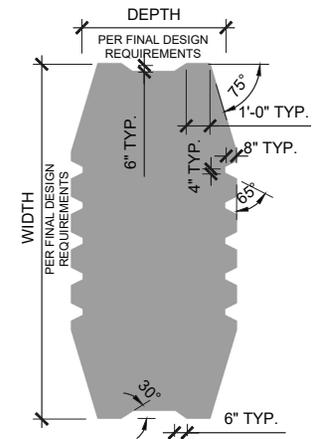
Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

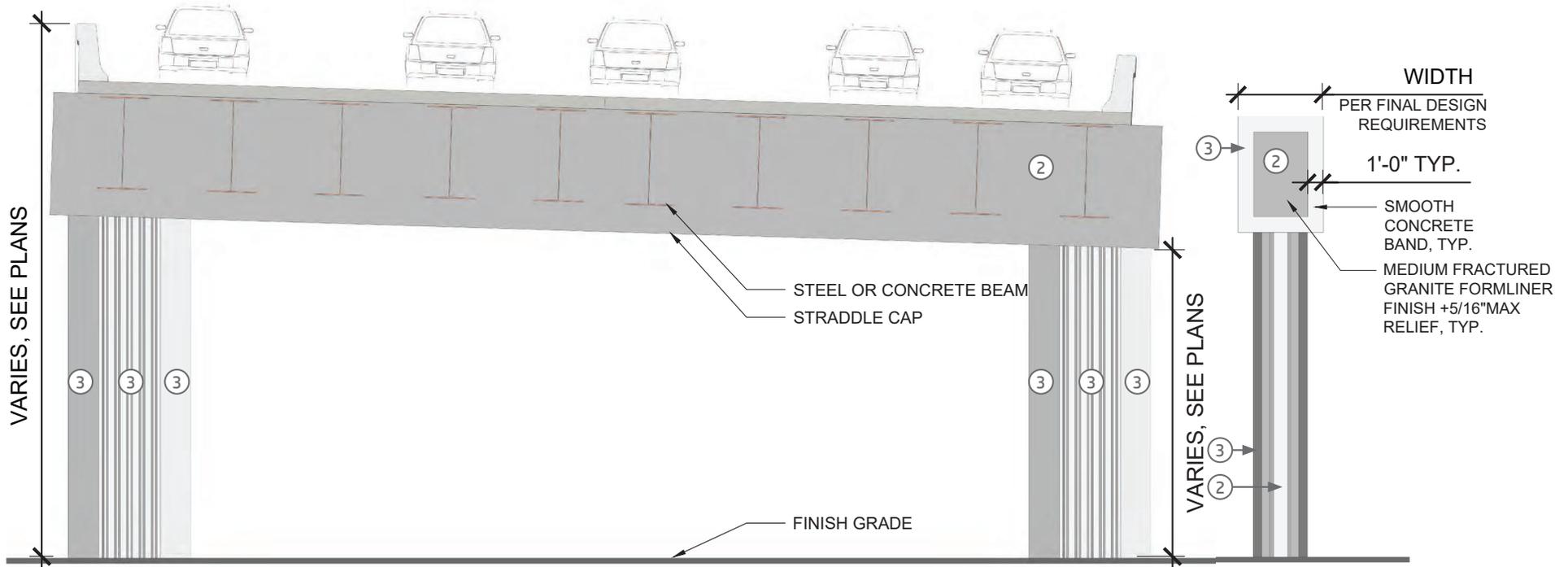
# STRADDLE BENT RECTANGULAR

COLOR LEGEND: SEE COLOR SECTION

- ① COLOR A1    ⑤ COLOR B2
- ② COLOR A2    ⑥ COLOR C
- ③ COLOR A3    ⑦ COLOR D
- ④ COLOR B1    ⑧ COLOR E



**COLUMN CROSS SECTION (TYPICAL)**



**VARIATION 1: FRONT & SIDE ELEVATION (TYPICAL)**

## Piers

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# MAJOR GATEWAY SURFACING SUMMARY

- A consistent 3'-0" wide asphalt block paver band shall be constructed immediately adjacent to the back of curb and parallel to the roadway. Materials shall be a "ground finish". Color shall resemble Hanover A80044 or approved equal.
- Asphalt block paver bands (or other vehicular-rated paver type) shall be constructed perpendicular to the roadway. Paver bands are to be 3'-0" wide at 19'-0" O.C. maximum. Materials should be a "ground finish". Color shall resemble Hanover A80046 or approved equal.
- Standard concrete pavement will separate each perpendicular asphalt paver band. All concrete surfaces shall be scored as indicated on the following drawings and receive a standard broom finish.



**WALKWAY SURFACE**

## TREATMENT PATTERNS



**RUNNING BOND PATTERN**



**SAW CUT JOINTS**



**COLOR BANDING**



**ACCENT COLORS**



**HEAVY DUTY**

# MAJOR GATEWAY SURFACING SCHEMATIC DETAILS

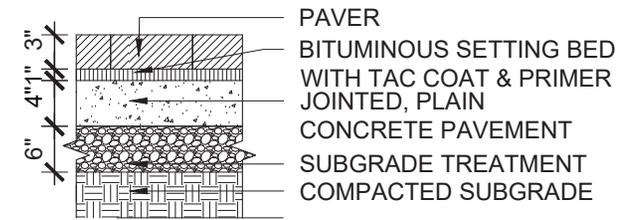
## Major Gateway Pedestrian Surfaces

In addition to the Roadway Surfaces and the Minor Gateway and Standard Pedestrian Surfaces, Major Gateway Pedestrian Surface areas utilize both concrete and specialty pavement treatments to highlight and emphasize the pedestrian environment.

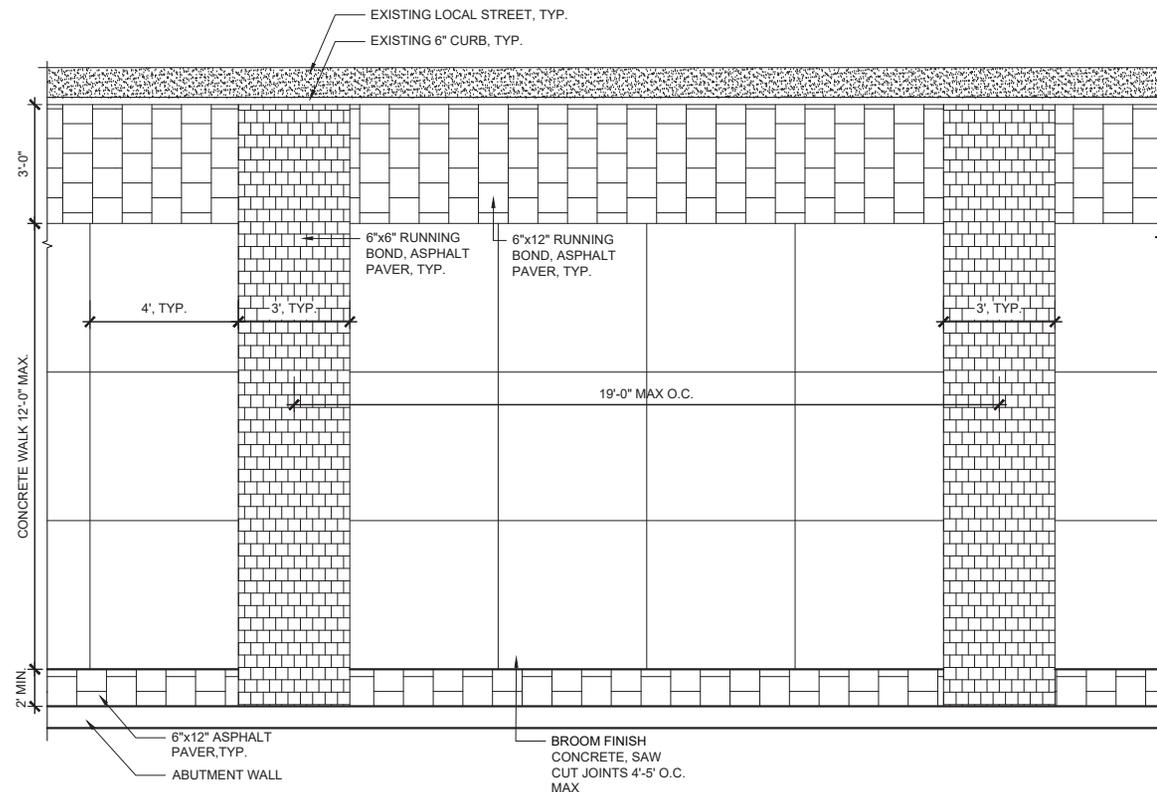
Major Gateway treatments occur at New York Street, Central Avenue, College Avenue, Alabama Street, 10th Street, Commerce Avenue, Michigan Street, and Washington Street.

## Major Gateway Pedestrian Surfaces: Recommended Manufacturers

- Hanover Architectural Products
- Belgard Pavers & Hardscapes
- Or Approved Equal



**SURFACING SECTION VIEW (TYPICAL)**



**SURFACING PLAN VIEW (TYPICAL)**

# LIGHTING

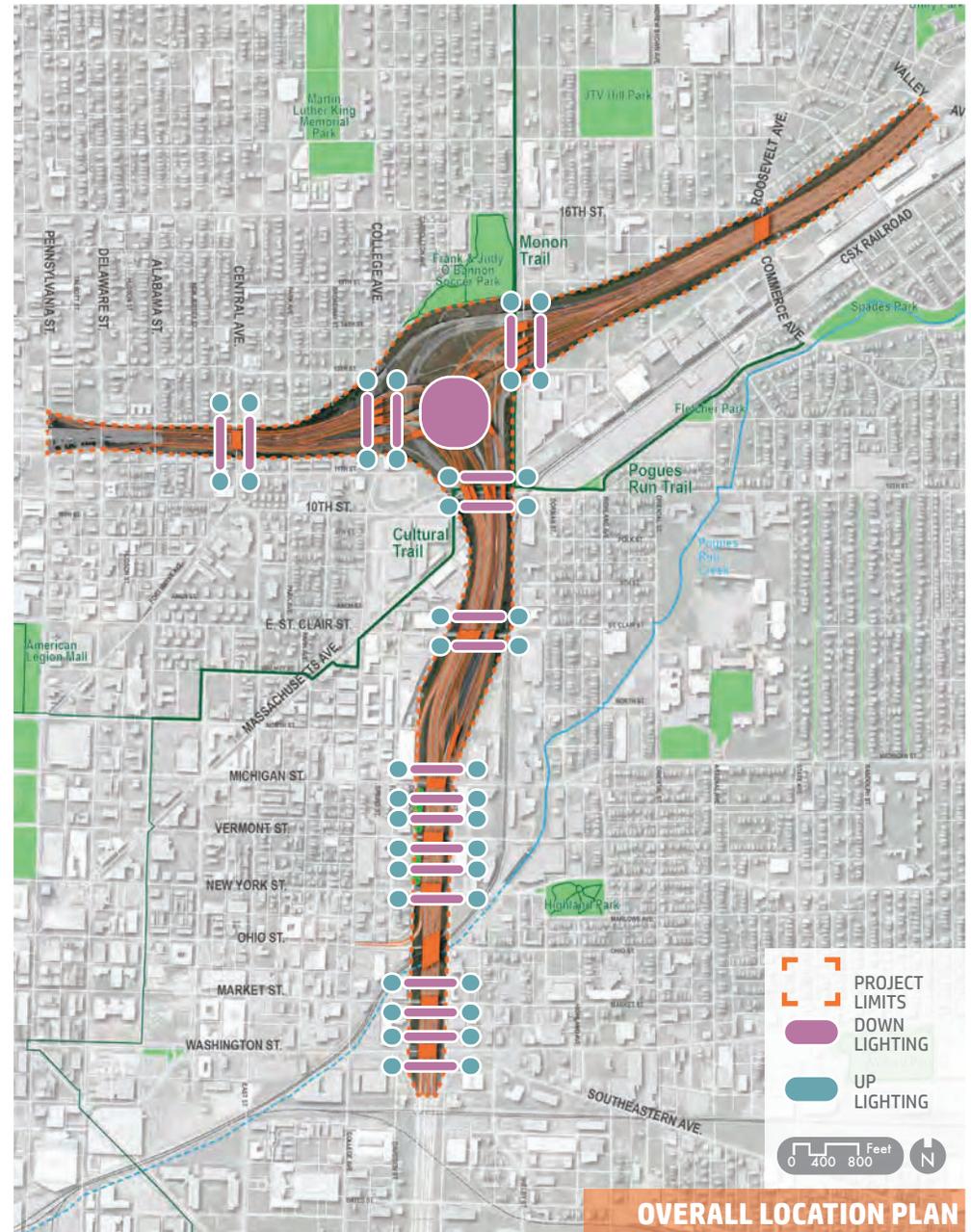
## Design Summary

The recommended lighting types include two distinct treatment options that respond to the needs of vehicles, pedestrians, bicyclists and adjacent property owners. These two lighting types shall include:

1. Down Lighting
2. Up Lighting

Each are further discussed on the following pages.

NOTE: Down Lighting in underpass must meet pedestrian lighting standards.





# DOWN LIGHTING

## Wall Mounted:

Bar Style down lighting shall be surface mounted to abutment wall coping to achieve pedestrian level lighting requirements. Mock-up shall be required for approval.

APPROPRIATE FIXTURES



**TARGETTI | JEDI  
COMPACT IP67 INTEGRAL**



**BEGA | LED  
WALL WASHER**



**LED LINEAR | XOOLUM  
IP67**



## Column Mounted:

Down lighting shall be mounted to the pier cap. Aesthetic light wash shall be directed vertically down the column and horizontally across the bridge underside.

APPROPRIATE FIXTURES



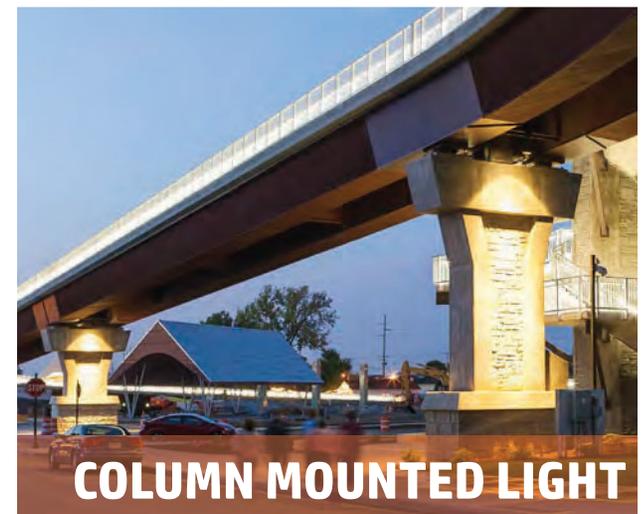
**BEGA | LED  
WALL WASHER**



**BEGA | LED  
COMPACT FLOOD**



**SELUX | AVANZA**





# UP LIGHTING

## BAR LIGHT:

Bar style up lighting shall be recess mounted to monument for tamper resistance and achieve uniform aesthetic lighting wash across entire monument. Mock-up shall be required for approval.

APPROPRIATE FIXTURES



**TARGETTI | JEDI  
COMPACT IP67 INTEGRAL**



**BEGA | LED  
WALL WASHER**



**LED LINEAR | XOOLUM  
IP67**

## SPOT LIGHT:

Spot style up lighting shall be ground mounted in a concrete base and achieve focused aesthetic lighting wash at location of future art in upper third of monument. Mock-up shall be required for approval.

APPROPRIATE FIXTURES



**TERON CIMMARON LED**



**HOLOPHANE PSLED**



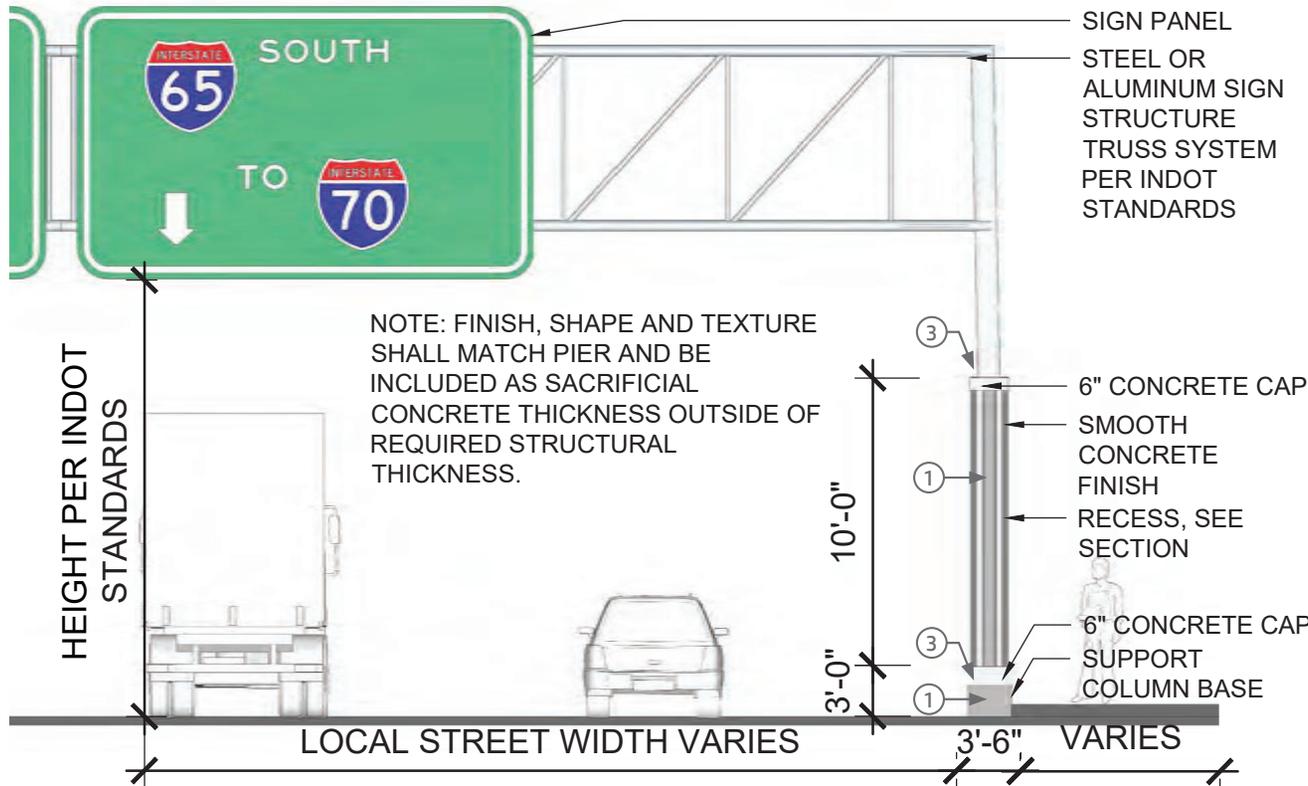
**BEGA | LED COMPACT  
FLOOD**



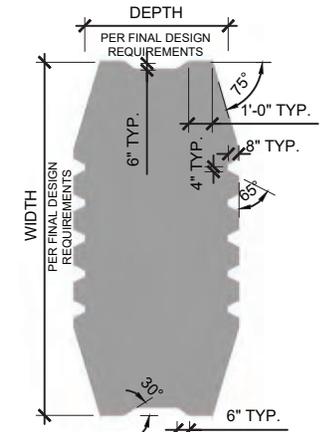
# OVERHEAD BOX TRUSS SIGN ON LOCAL STREETS

**COLOR LEGEND: SEE COLOR SECTION**

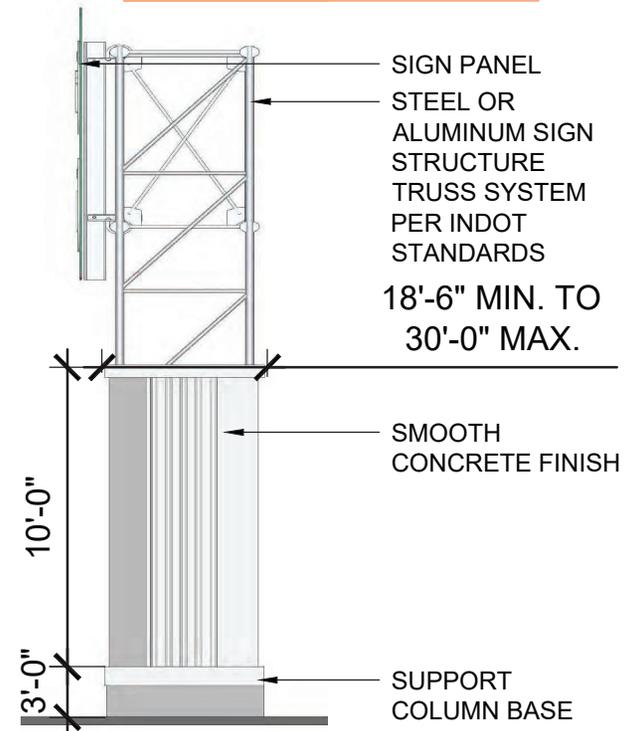
- ① COLOR A1    ⑤ COLOR B2
- ② COLOR A2    ⑥ COLOR C
- ③ COLOR A3    ⑦ COLOR D
- ④ COLOR B1    ⑧ COLOR E



**FRONT ELEVATION (TYPICAL)**



**COLUMN CROSS SECTION, TYP.**

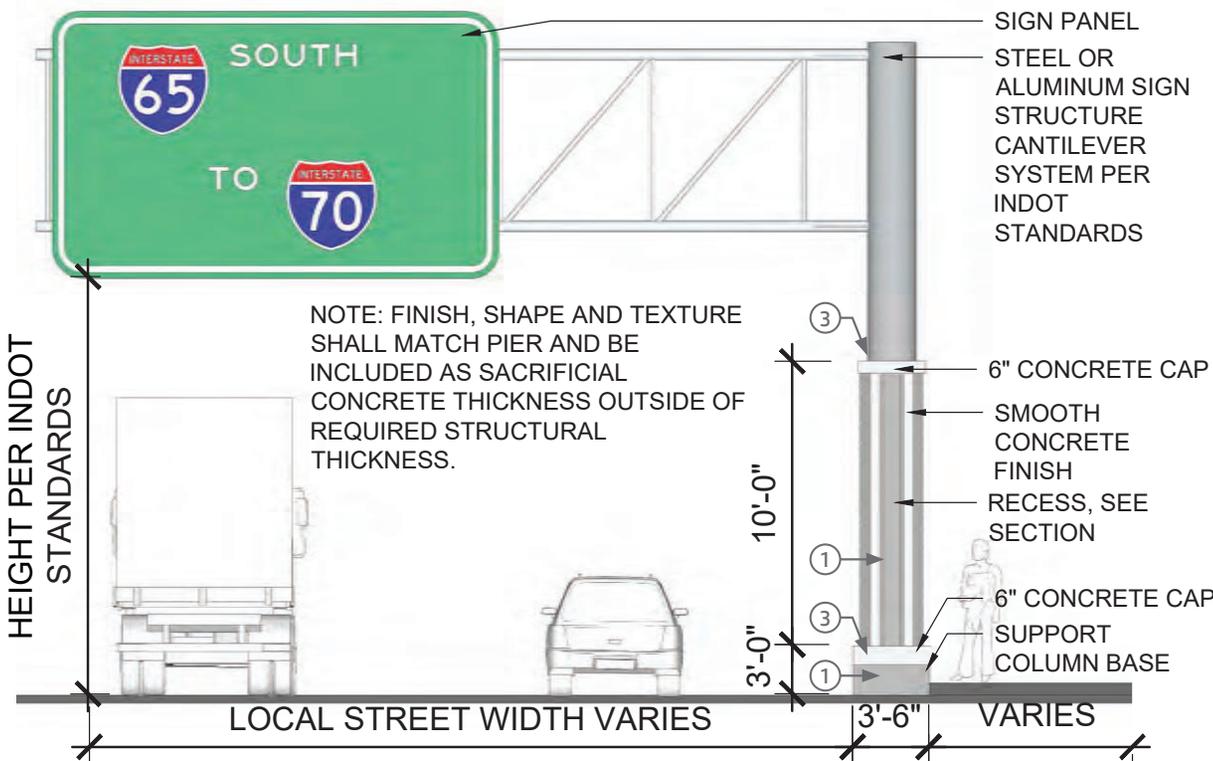


**SIDE ELEVATION (TYPICAL)**

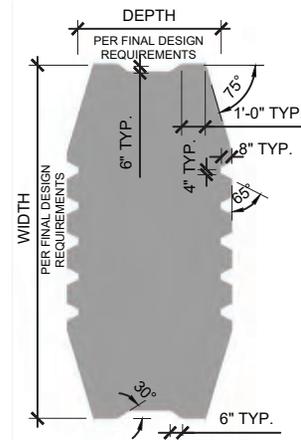
# OVERHEAD CANTILEVER SIGN ON LOCAL STREETS

COLOR LEGEND: SEE COLOR SECTION

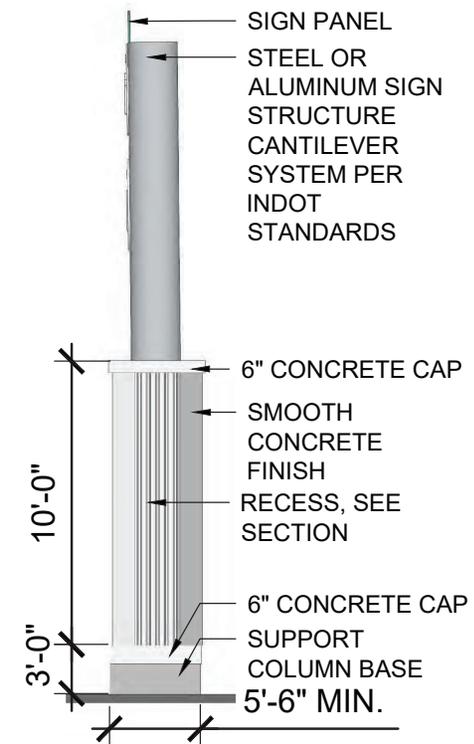
- ① COLOR A1    ⑤ COLOR B2
- ② COLOR A2    ⑥ COLOR C
- ③ COLOR A3    ⑦ COLOR D
- ④ COLOR B1    ⑧ COLOR E



**FRONT ELEVATION (TYPICAL)**



**COLUMN CROSS SECTION, TYP.**

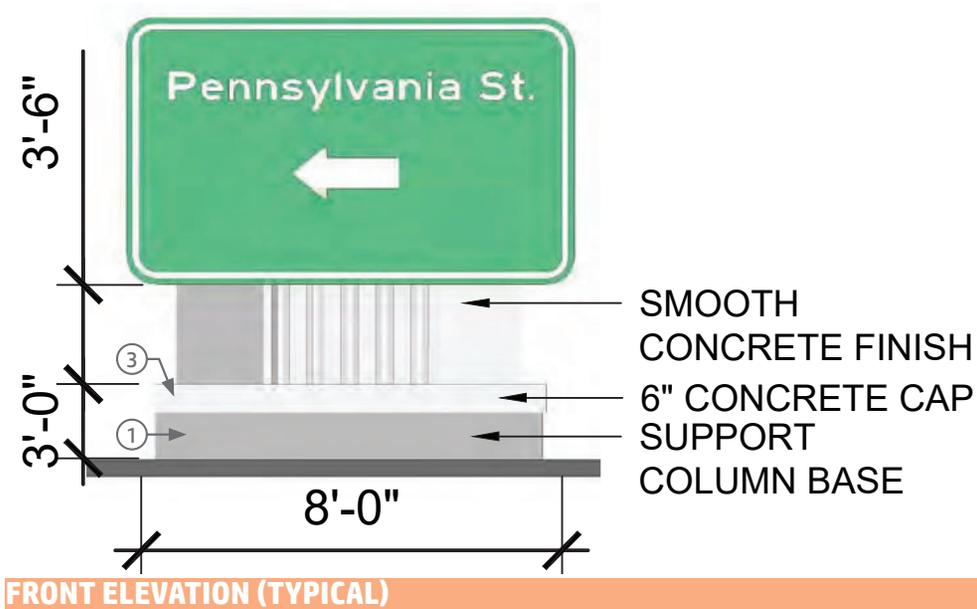


**SIDE ELEVATION (TYPICAL)**

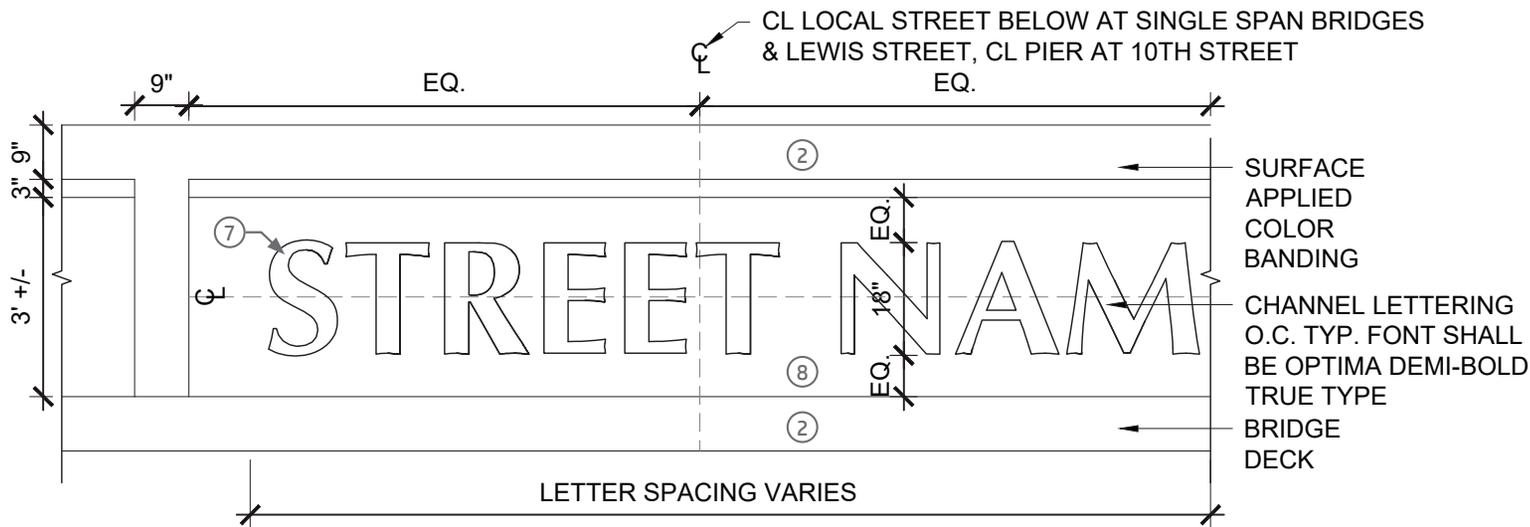
# GROUND- MOUNTED PANEL SIGN AT LOCAL STREETS

**COLOR LEGEND: SEE COLOR SECTION**

- ① COLOR A1    ⑤ COLOR B2
- ② COLOR A2    ⑥ COLOR C
- ③ COLOR A3    ⑦ COLOR D
- ④ COLOR B1    ⑧ COLOR E



# TRAFFIC BARRIERS

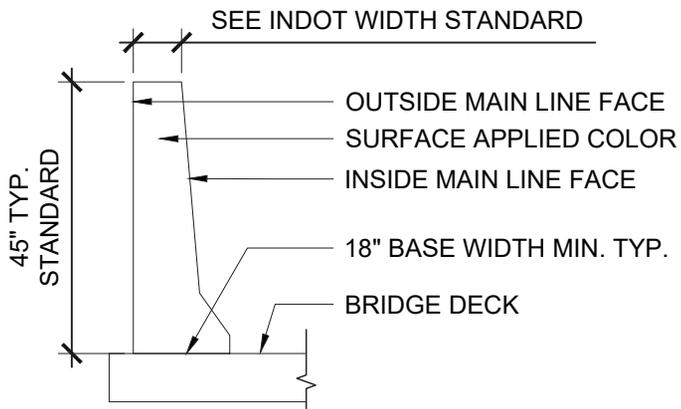


**COLOR LEGEND: SEE COLOR SECTION**

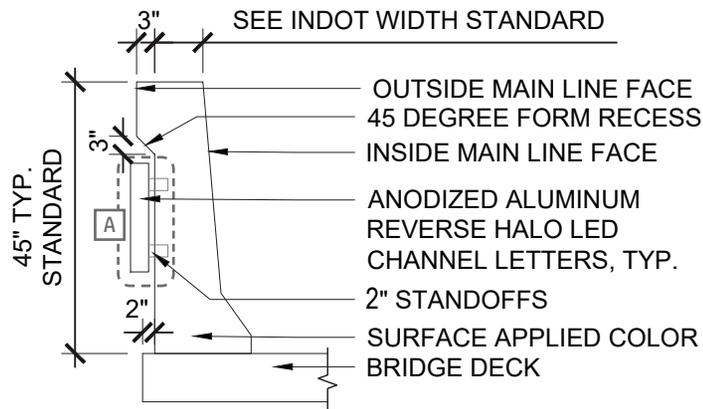
① COLOR A1	⑤ COLOR B2
② COLOR A2	⑥ COLOR C
③ COLOR A3	⑦ COLOR D
④ COLOR B1	⑧ COLOR E

**NOTE: STRUCTURAL DESIGN OF LETTERING CONNECTION TO BARRIER SHALL BE THE RESPONSIBILITY OF THE DESIGN-BUILD CONTRACTOR IN ACCORDANCE WITH THE TECHNICAL PROVISIONS AND PROJECT STANDARDS.**

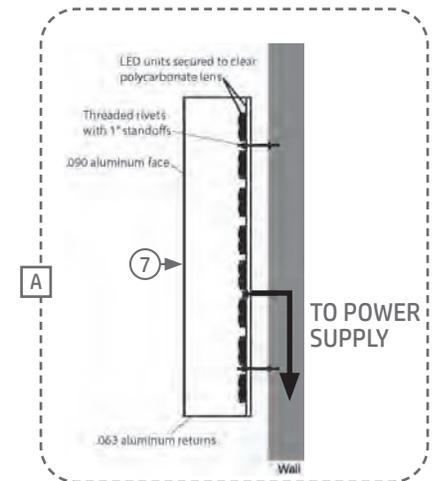
**OUTSIDE FACE ELEVATION (TYPICAL)**



**STANDARD BARRIER CROSS SECTION (TYPICAL)**



**SIGN BARRIER CROSS SECTION (TYPICAL)**

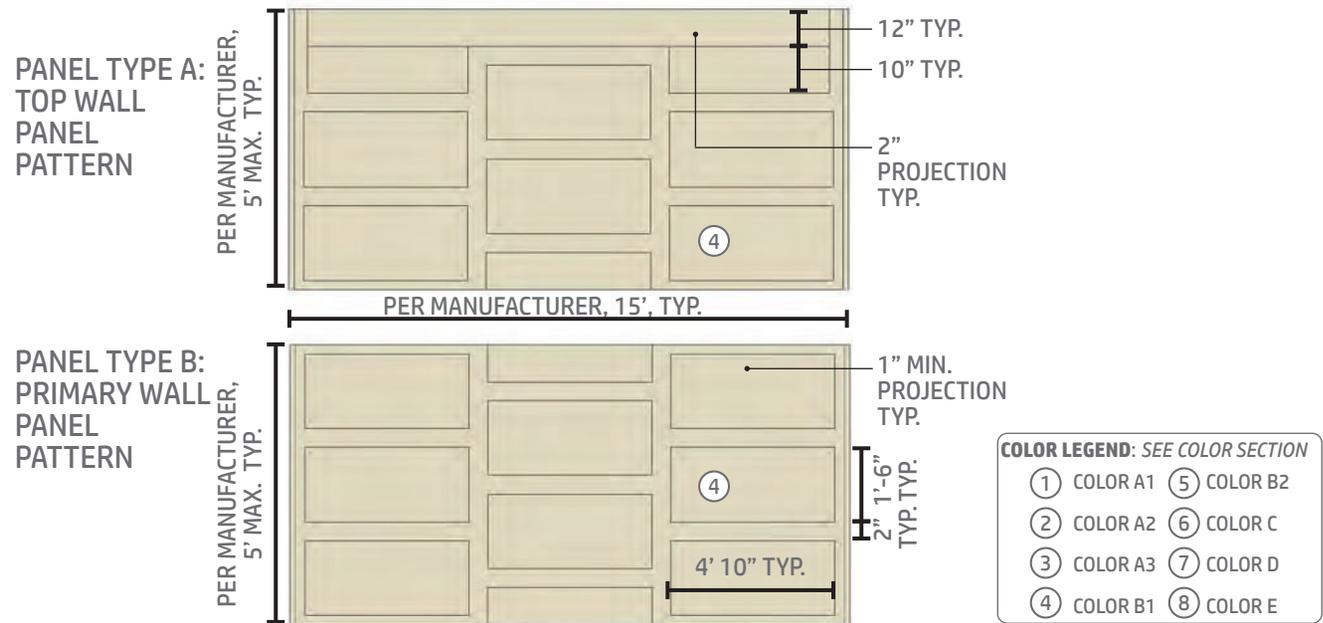


**REVERSE HALO CHANNEL LETTER**

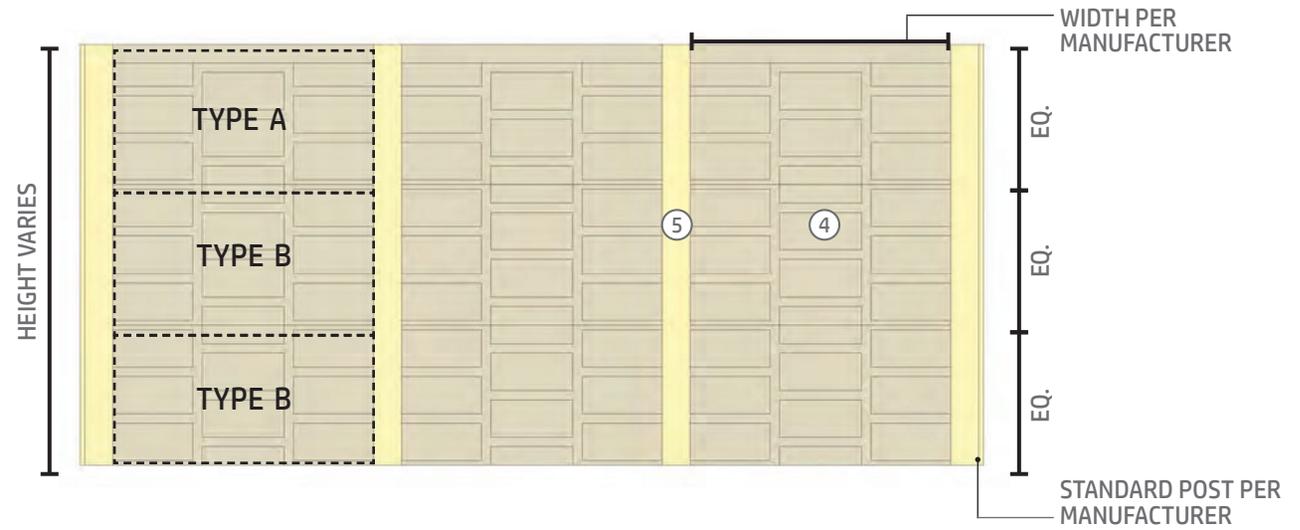
# SOUND BARRIERS

## Characteristics

- Panel patterns shall be proportionally scaled to meet manufacturer's requirements.
- Panel textures, colors and patterns shall be visually consistent with MSE walls.



## SOUND BARRIER PANEL TYPES (TYPICAL)



## SOUND BARRIER FRONT ELEVATION (TYPICAL)

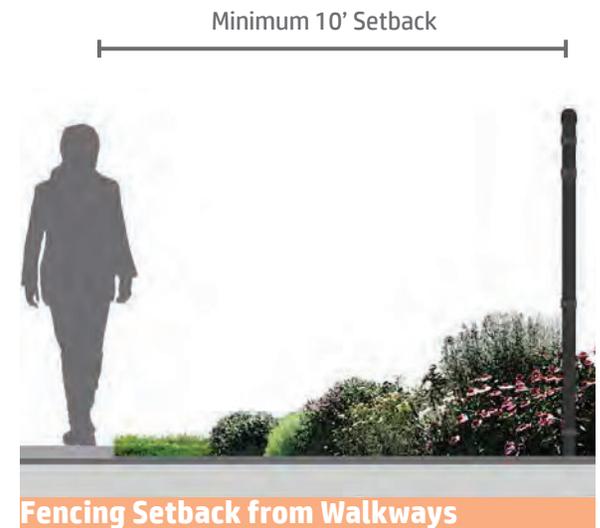
### Sound Barriers

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# FENCING

Fencing shall be chain-link with black vinyl coating and meet height requirements between 4' and 6', with 6' fencing used adjacent to the Monon Trail.



# BRIDGES OPENINGS

## Overview:

With the reconstruction of the I-65/I-70 North Split interchange, the bridges that pass over local city streets will be replaced as part of this project. Thirteen downtown city streets are directly affected by the project. When the project is complete, all existing streets will still function as through streets with the interstate remaining elevated, bridging over the local streets.

The proposed design of the bridge opening infrastructure provides wider underpass openings, creating a safer and more inviting environment for accommodating pedestrians and vehicles.

## Bridge Opening Types

Three bridge opening types were developed for local roadway connections. These bridge opening types shall be:

- 1. Major Gateway Bridge Openings:** These bridge openings signify the most visible and highly used connections under the interstate. They shall function as neighborhood gateways, arterial street enhancements, and access points to the interstate.
- 2. Minor Gateway Bridge Openings:** These bridge openings occur at collector and neighborhood streets and shall be visually similar to the Major Gateway Bridges.
- 3. Standard Bridge Openings:** These bridge openings are essentially the base build condition. These bridges are more utilitarian and shall occur at bridges within the interchange, interior bridges sandwiched between a set of Major or Minor Bridges, or other areas where there is little or no pedestrian activity.

The bridge opening types shall contain a basic level of design enhancements proposed as part of the project, including wider sidewalks to encourage pedestrian connectivity, bridge abutment walls to reduce sidewalk edge encampment and loitering, traffic barriers with place making and wayfinding elements, and enhanced underpass lighting and visibility. The structural bridge components shall be designed to highlight the engineering and materials of the bridge components, allowing the engineering design to add to the overall visual interest of the underpass. While not overly detailed, integrating this level of ornamentation at the bridge openings enhances the character and overall visual impact to the infrastructure.

With the exception of only a few locations, all bridge openings cross over a local roadway. In the instance where a bridge opening crosses over a shared use trail, rail line, or on-ramp, the bridge structure aesthetic enhancements shall be applied while the ground plane enhancements shall not be applied due to varying conditions.

# MAJOR GATEWAY BRIDGES

## Design Summary:

Major Gateway Bridges provide crossing of I-65/I-70 over collector and arterial streets. To accomplish this, the following summarize the general characteristics of the Major Gateway Bridges:

- Provide safe, efficient and accommodating pedestrian and bicycle facilities at the local street level to improve connectivity.
- Apply enhanced treatments to abutment corner monuments, and traffic barriers while maintaining visual consistency to the Minor and Standard Underpass Bridges.

## Locations:

The major gateway bridges within the project shall be at the following locations, as illustrated on the corridor map:

- 10th Street (double span)
- Central Avenue (single span)
- College Avenue (single span)
- Lewis Street/ Monon Trail (double span)
- New York Street (Single Span)
- Michigan Street (single span)
- Washington Street (single span)



**OVERALL LOCATION PLAN**

# MAJOR GATEWAY BRIDGES

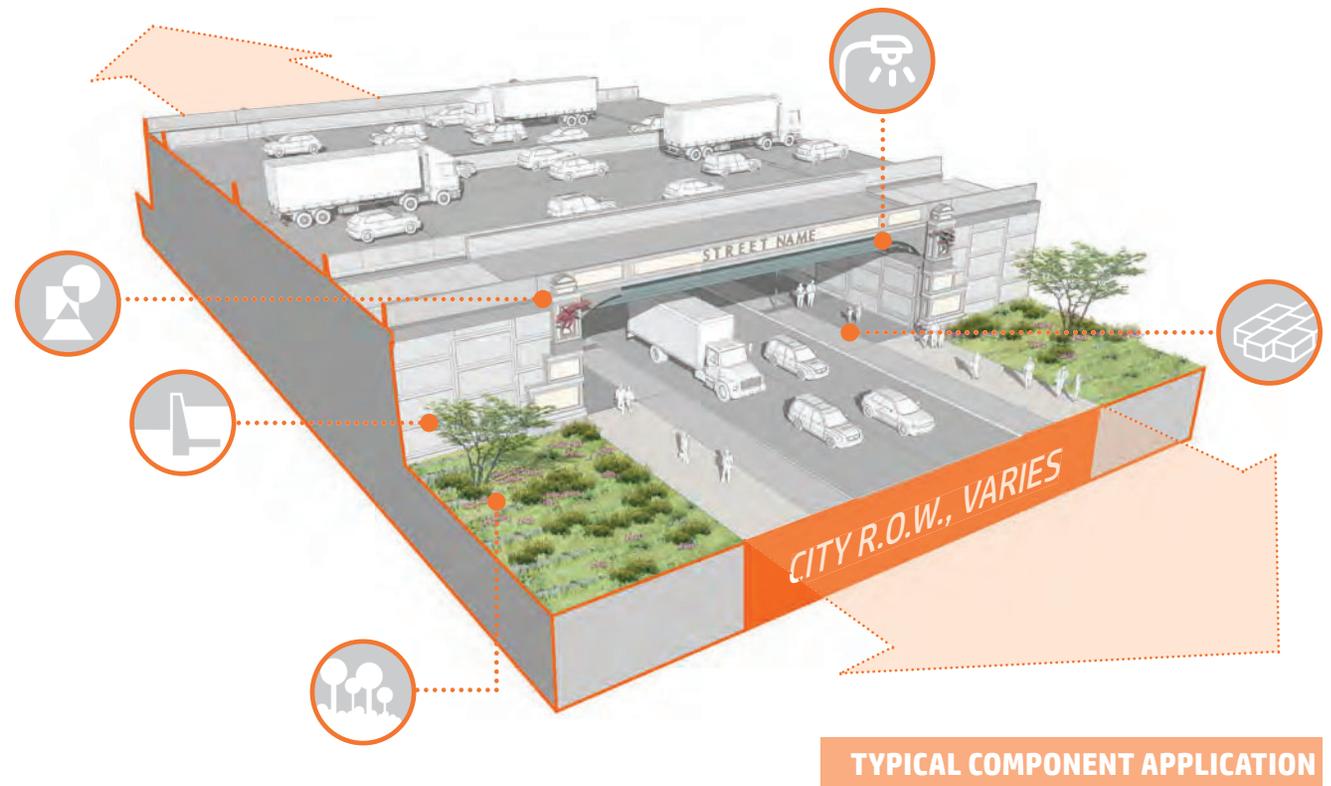
## Application Summary:

This bridge type is influenced and inspired by local landmarks, civic identity and historic forms within the context of downtown and surrounding neighborhoods' architecture. The Major Gateway Bridge design builds upon the decorative and detailed character utilizing texture and shapes found in the surrounding context that celebrate the capitol city. It provides an opportunity for the integration of future public art within the public realm.

## COMPONENT USE:

Design enhancements for Major Gateway Bridges shall include the following:

- Abutment Walls
- Lighting
- Surfacing
- Landscape
- Public Art Spaces

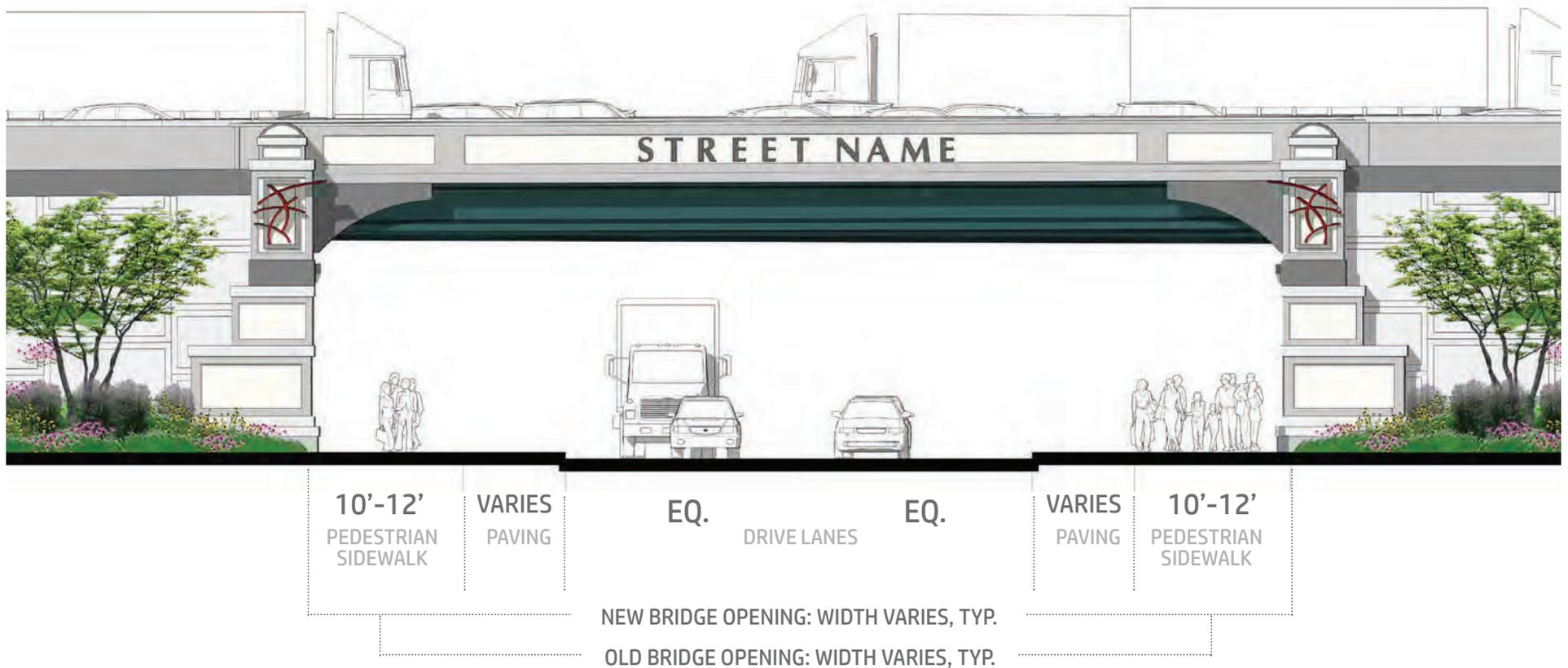


TYPICAL COMPONENT APPLICATION

# MAJOR GATEWAY BRIDGE APPLICATION SINGLE SPAN

## NOTES:

1. CORNER MONUMENTS ONLY REQUIRED ON THE OUTSIDE OF EXTERIOR BRIDGES FOR A TOTAL OF 4 PER CROSSING.

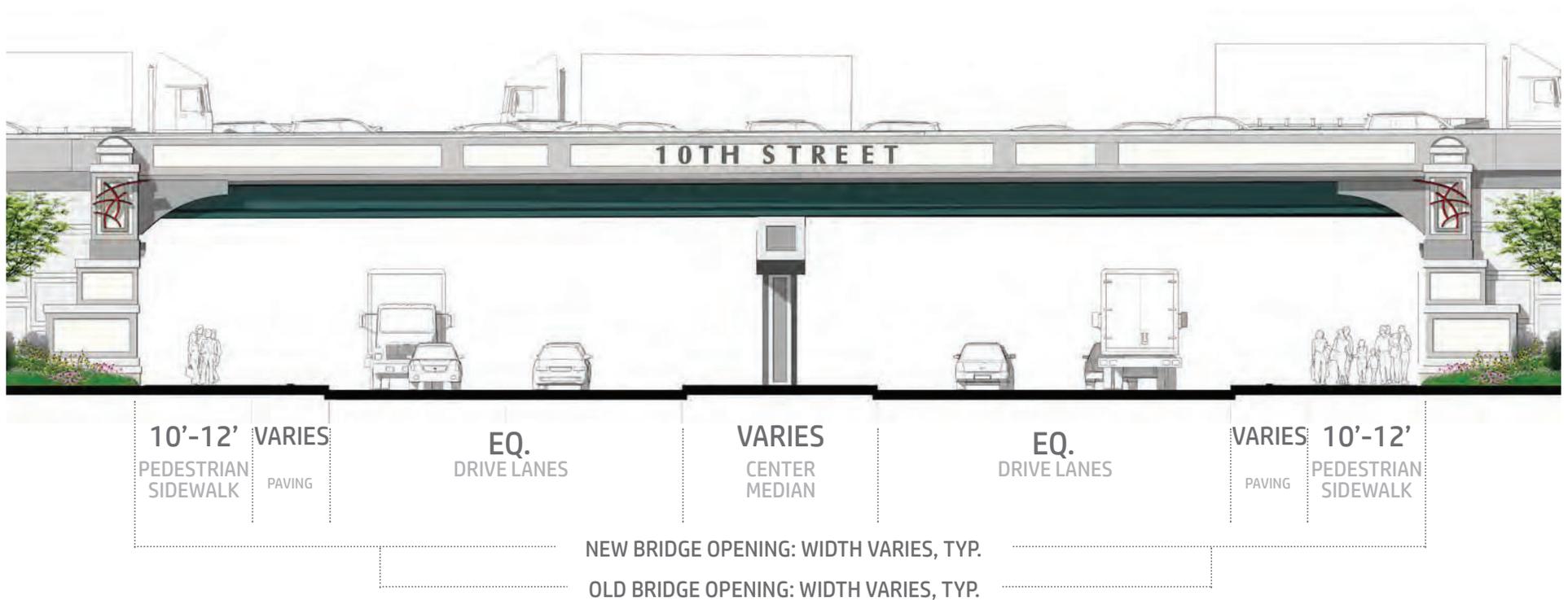


**TYPICAL MAJOR GATEWAY BRIDGE ELEVATION**

# MAJOR GATEWAY BRIDGE APPLICATION DOUBLE SPAN TYPICAL

## NOTES:

1. CORNER MONUMENTS ONLY REQUIRED ON THE OUTSIDE OF EXTERIOR BRIDGES FOR A TOTAL OF 4 PER CROSSING.

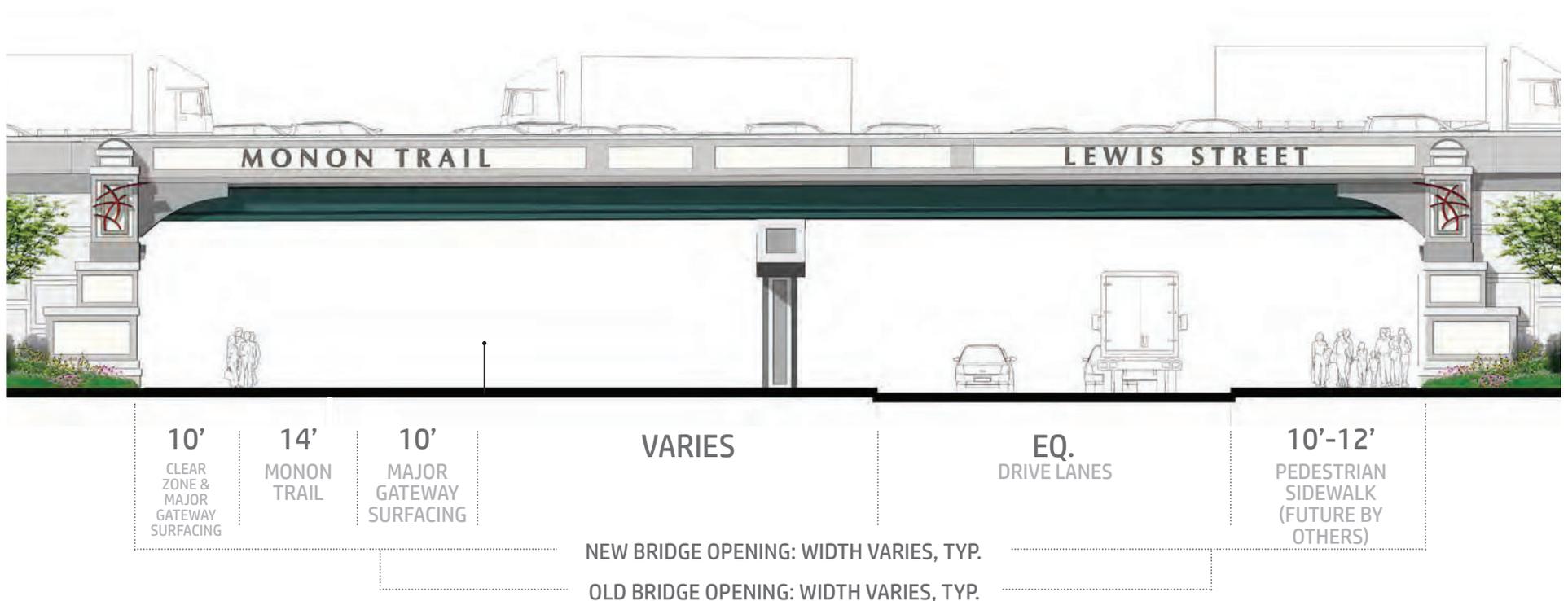


**TYPICAL MAJOR GATEWAY BRIDGE ELEVATION**

# MAJOR GATEWAY BRIDGE APPLICATION DOUBLE SPAN AT MONON LEWIS STREET

## NOTES:

1. CORNER MONUMENTS ONLY REQUIRED ON THE OUTSIDE OF EXTERIOR BRIDGES FOR A TOTAL OF 4 PER CROSSING.



**TYPICAL MAJOR GATEWAY BRIDGE ELEVATION**



Bridge Opening

Des. Nos. 1592385 & 1600808

Des. Nos.: 1592385 and 1600808, Final MOA, April 24, 2020 Version

# MINOR GATEWAY BRIDGES

## Design Summary:

Minor Gateway Bridges provide crossing of I-65/I-70 over smaller-scaled less traveled local streets. The following summarizes the general characteristics of the Minor Underpass Bridges:

- Provide safe, efficient and accommodating pedestrian and bicycle facilities through the underpasses at the local street level to improve connectivity.
- Apply simplified treatments to abutment corner monuments, and traffic barriers while maintaining visual consistency to the Major and Standard Underpass Bridges.

## Locations:

The bridges identified within the project that shall be considered Minor Gateways, as illustrated on the corridor map:

- Market Street
- Vermont Street
- St. Clair Street



# MINOR GATEWAY BRIDGES

## Application Summary:

This bridge type is also influenced by landmarks, identity and historic forms within the downtown and surrounding neighborhood context. The Minor Gateway Bridge design simplifies aspects of the major gateway counterpart, while still utilizing texture and shapes found in the surrounding neighborhood that celebrate the capitol city. The consistency in infrastructure features provides for the project's visual uniformity.

## COMPONENT USE:

Design treatments for Minor Gateway Bridges shall include the following:

- Abutment Walls
- Lighting
- Surfacing
- Landscape

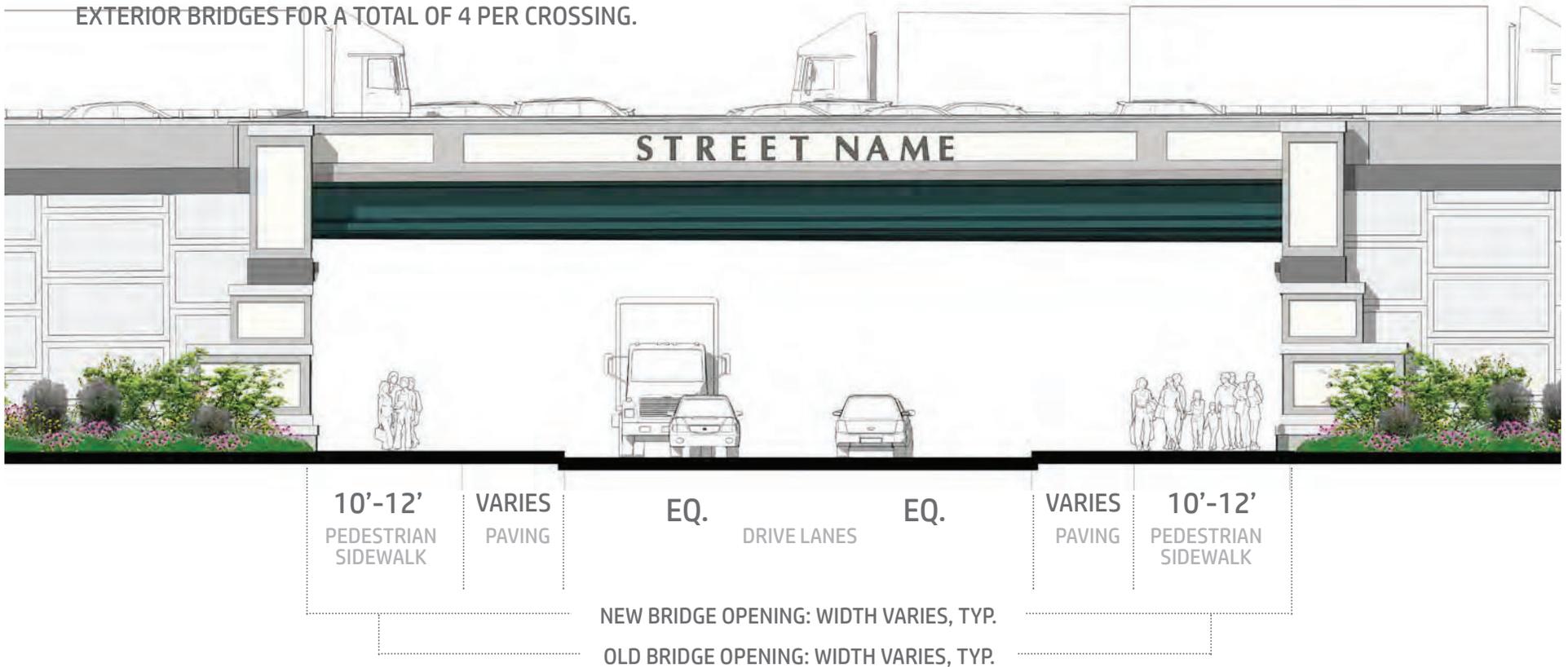


TYPICAL COMPONENT APPLICATION

# MINOR GATEWAY BRIDGE APPLICATION

## NOTES:

1. PLANTING AND LIGHTING BUFFER ZONES ONLY REQUIRED AT ST. CLAIR STREET CROSSING.
2. CORNER MONUMENTS ONLY REQUIRED ON THE OUTSIDE OF EXTERIOR BRIDGES FOR A TOTAL OF 4 PER CROSSING.



**TYPICAL MINOR GATEWAY BRIDGE ELEVATION**

# STANDARD UNDERPASS SURFACES

## Design Summary:

Standard Underpass Bridges provide crossing of I-65/I-70 over local streets. The following summarize the general characteristics of the Standard Underpass Bridges:

- Provide safe, efficient and accommodating pedestrian and bicycle facilities at the local street level to improve connectivity.
- Apply simplified treatments with visual consistency to the Major and Minor Underpass Bridges.

## Standard Underpass Locations:

The bridges identified within the project that shall receive the standard underpass treatment at the following locations, as illustrated on the corridor map:

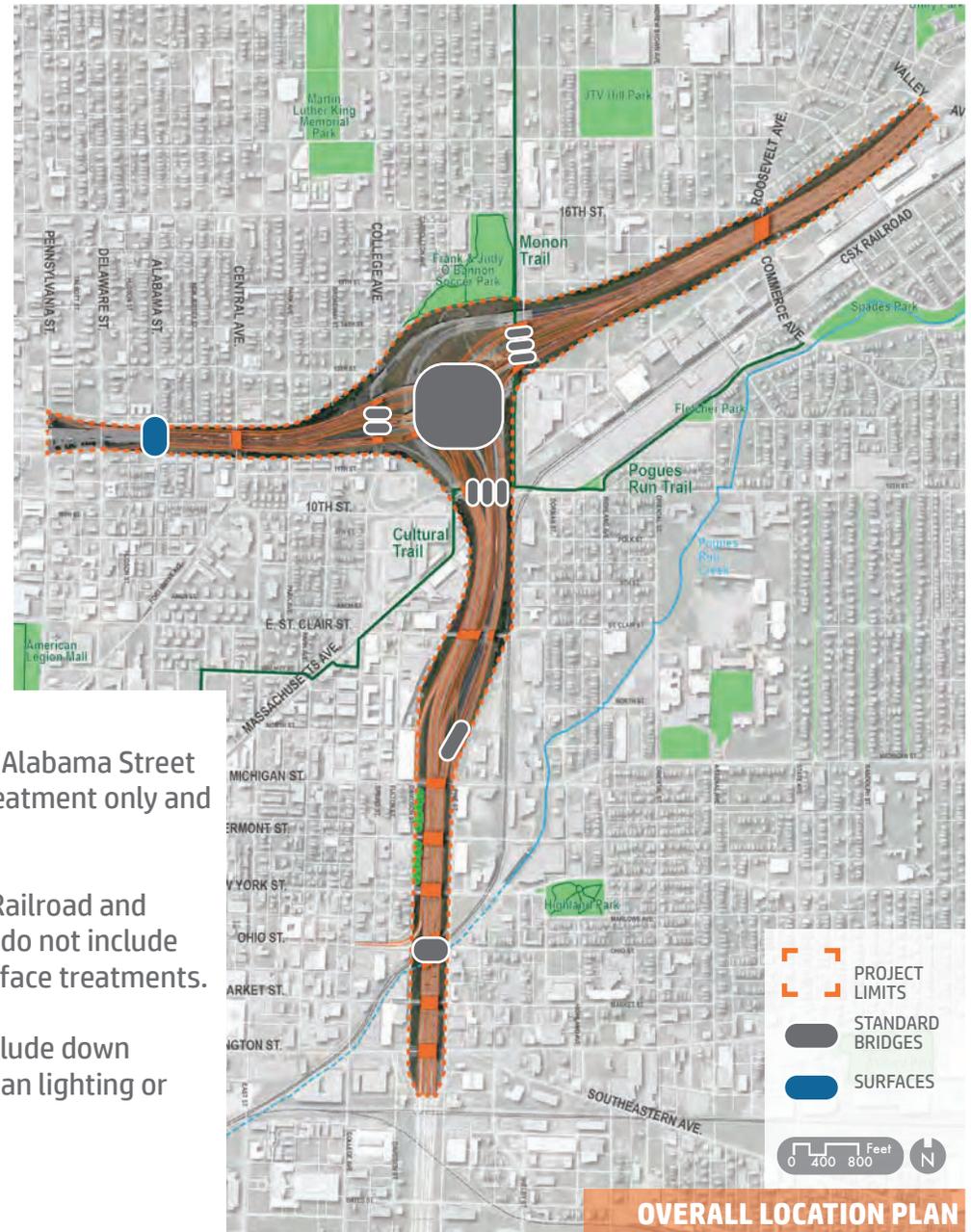
- College Avenue (2 internal bridges)
- 10th Street (3 internal bridges)
- Pine Street (1 straddle bent)
- Lewis Street/ Monon Trail (3 internal bridges)
- Ohio Street & CSX Railroad (3 bridges)
- Interchange (all bridge locations)

## Treatment Notes:

The Standard Bridge at Alabama Street shall receive surface treatment only and no pedestrian lighting.

The Ohio Street & CSX Railroad and the Pine Street bridges do not include pedestrian lights or surface treatments.

Interchange bridges include down lighting but no pedestrian lighting or surface treatments.



**OVERALL LOCATION PLAN**

# STANDARD UNDERPASS BRIDGES

## Application Summary:

This bridge type is a simplified version of the three types. It is to be used in conditions where visibility is less significant or it is less visible, such as between two Major or Minor Gateway Bridges if the bridge span requires multiple bridge decks. This bridge is intended to maintain visual uniformity and continue to enhance the design aesthetic within the project area.

## COMPONENT USE:

Standard Bridge treatments shall include the following components:

- Abutment Walls
- Lighting
- Surfacing

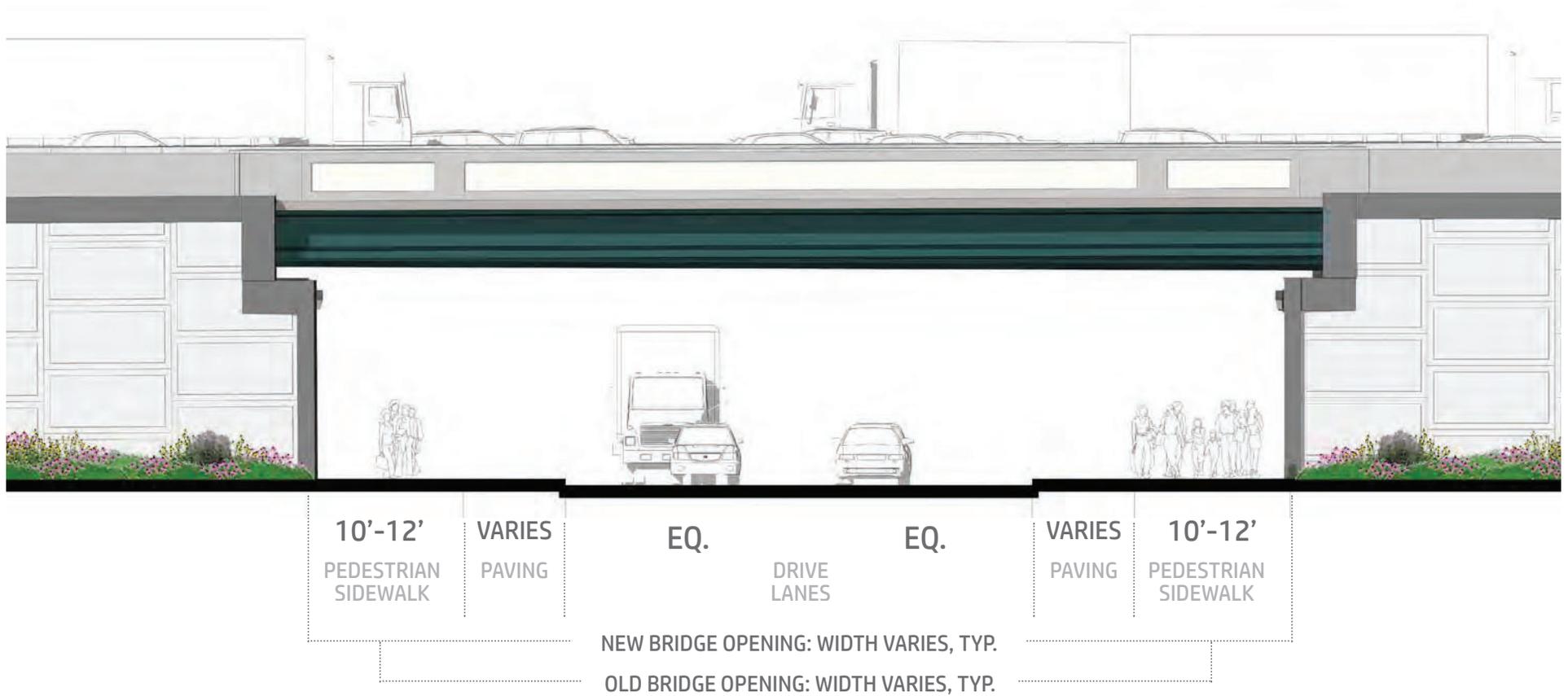
## NOTE:

Local level surface treatments will not apply to interchange bridges and ramp bridges where no pedestrian facilities currently exist.



TYPICAL COMPONENT APPLICATION

# STANDARD UNDERPASS BRIDGE APPLICATION



**TYPICAL STANDARD BRIDGE ELEVATION**

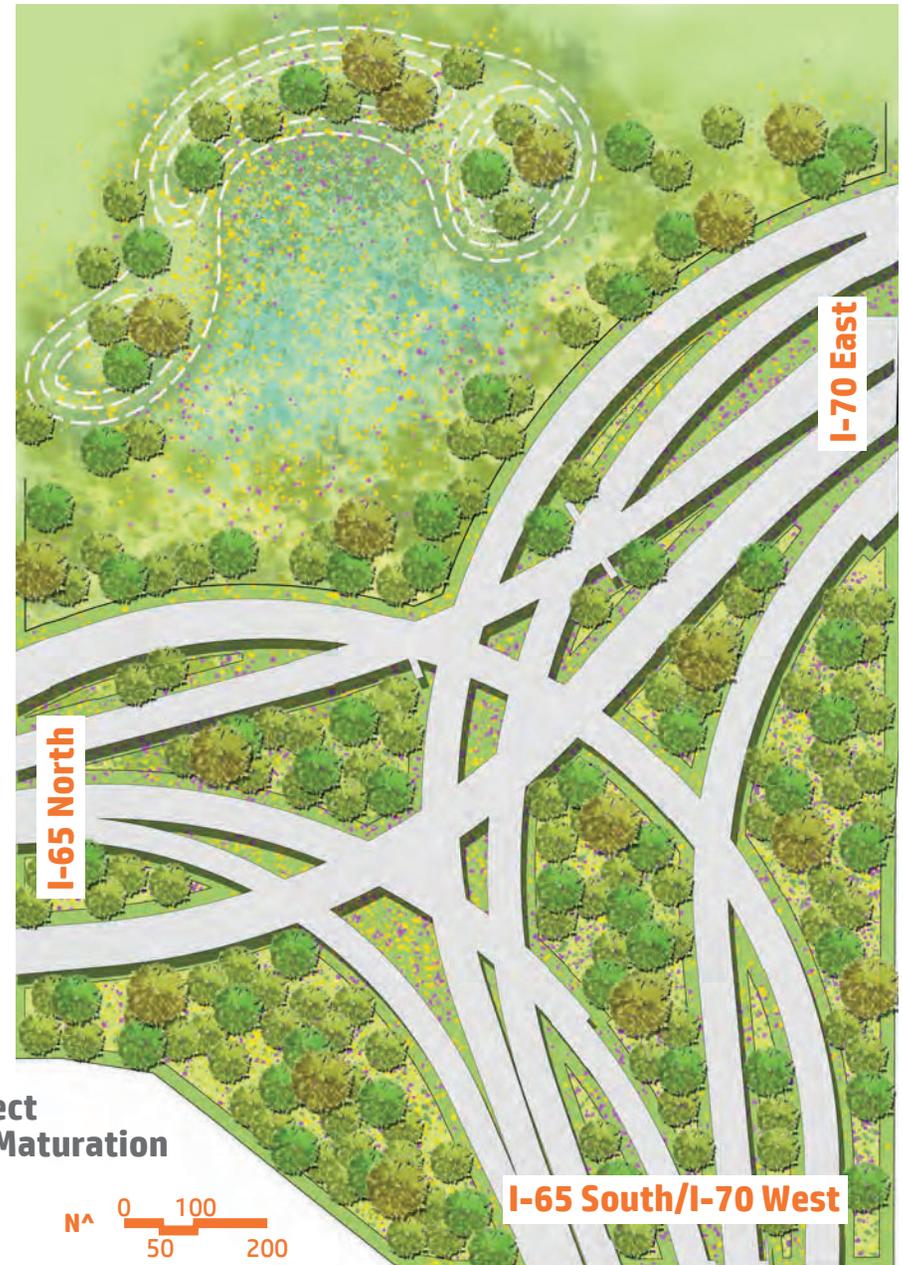
# LANDSCAPE INTRODUCTION

## Landscape Summary

This section of the North Split Aesthetic Design Guidelines provides direction for landscape form and function, evaluating how vegetative aesthetic treatments can also serve the needs for the INDOT-owned interstate, the City-owned local streets and the surrounding communities.

Information gained from neighborhood workshops and surveys during the Context Sensitive Solutions process of the I-65/I-70 North Split Project indicated that the public preferred a more naturalistic approach to landscape design with many referring to the term “urban forest.” This urban forest concept has been considered as part of the design guidelines - found in *Interchange Plantings* of this section.

This document also recognizes the existence of INDOT standards, as well local groups (such as Keep Indianapolis Beautiful) and resources for achieving the proposed design.



**I-65/I-70 North Split Project Interchange Plantings at Maturation**

# LANDSCAPE OVERVIEW

## Landscape Design Typology

The landscape palette includes a range of treatments that focus primarily on native plant selections to enhance the aesthetic appeal of the interchange. The design concept places plant species within urban conditions that best represent their naturally occurring plant communities. The typologies for the landscape treatment include:

- Tree Preservation Areas as “The Nature Reserve”
- 10’ Buffer-Zones as “The Lawn”
- Side Slope Plantings as “The Uplands”
- Screen Plantings as “The Woodlands”
- Interchange Plantings as “The Prairie’s Edge”
- Detention Basin Plantings as “The Wetlands”

## Typology 1: Tree Preservation

Tree Preservation Areas protect trees that are deemed “significant” to the landscape. Tree preservation areas were determined through the Section 106 Consultation Process and are included in the final “Do Not Disturb” areas for the project site.

## Typology 2: 10’ Buffer-Zone

The 10’ Buffer-Zone is intended to maintain a set-back for plantings so there is no interference between the landscaped areas and roadway functions.

## Typology 3: Side Slope Plantings

Plants, rather than extended infrastructure, can be used for erosion control and soil stabilization along the interstate embankments as a cost-effective and less-infrastructure dependent option.

## Typology 4: Screen Plantings

Plants can minimize the appearance of sound barriers from adjacent residences.

## Typology 5: Interchange Plantings

Plants can give purpose to expansive spaces, within and around the interchange, in a manner that is low-cost and less maintenance intensive, while still providing visual interest.

## Typology 6: Detention Basin Plantings

Plants allow for the filtration and infiltration of storm water on site. As such, a heavily planted area for the purpose of stormwater detention - a dry extended detention basin - is favored over a traditional retention pond for the benefits it can offer the urban landscape.

# LANDSCAPE OVERVIEW

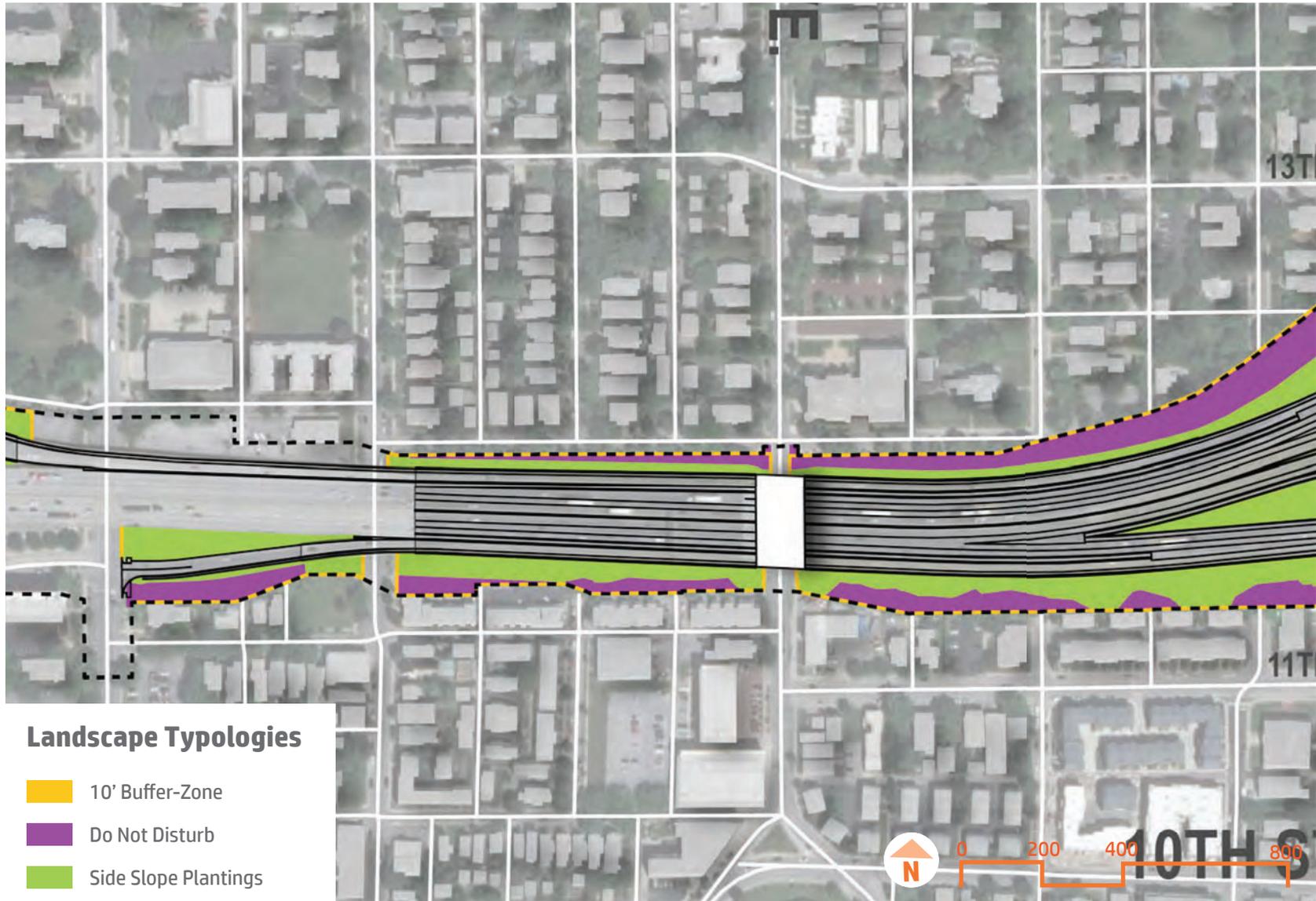
## Design Summary

The landscape palette shall utilize a range of treatments that focus on native plant selections to enhance the interchange and overall corridor. The graphic on the right identifies **general** areas of appropriateness for landscape treatment typologies. Final typologies may vary depending on the final engineering considerations of the interstate and associated structures.

## Guidelines

- Use native, low-maintenance plants whenever possible
- Soften urban elements of the corridor with a naturalized placement of plants
- Provide a diverse palette of plants species





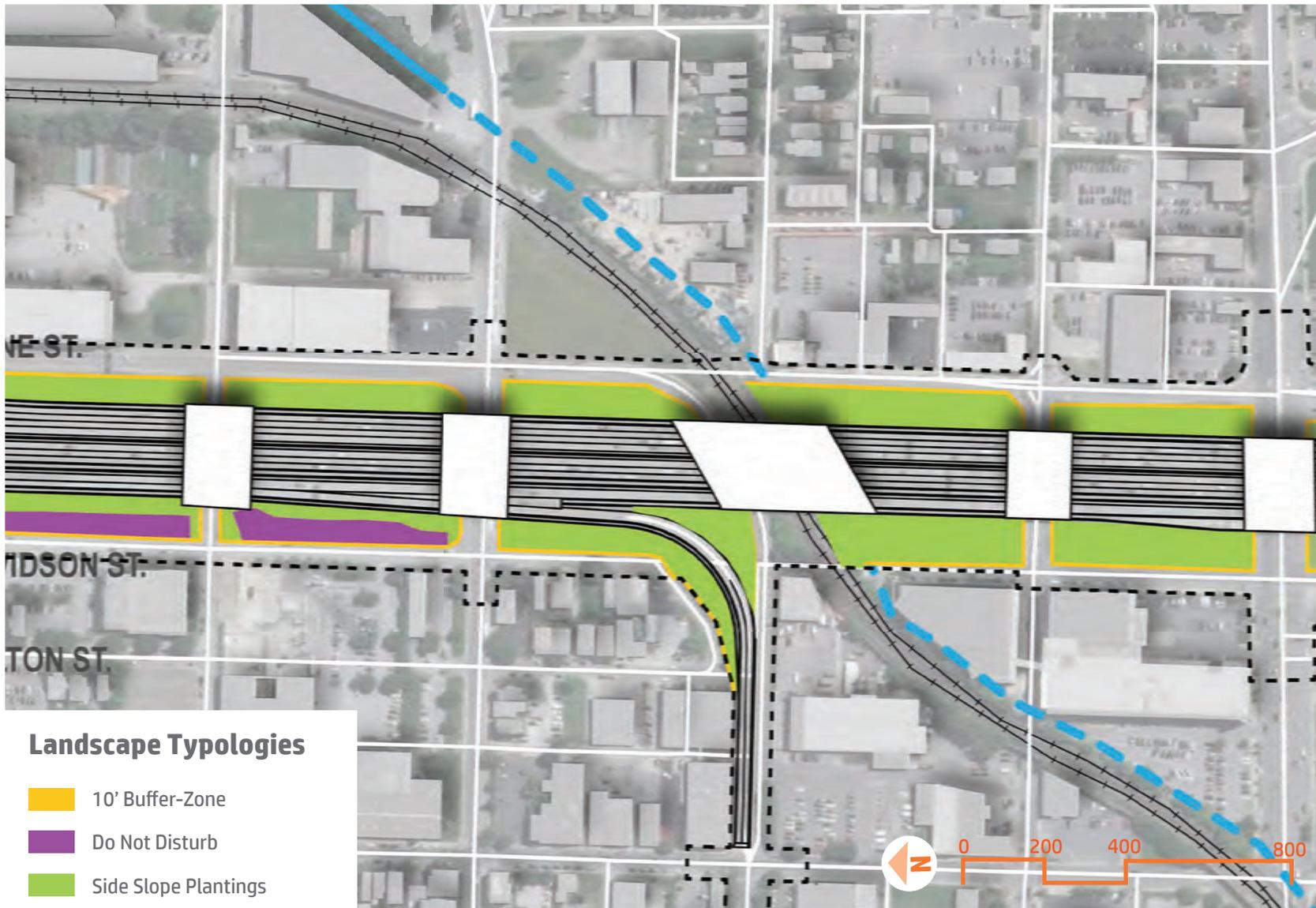
**Landscape Typologies**

- 10' Buffer-Zone
- Do Not Disturb
- Side Slope Plantings

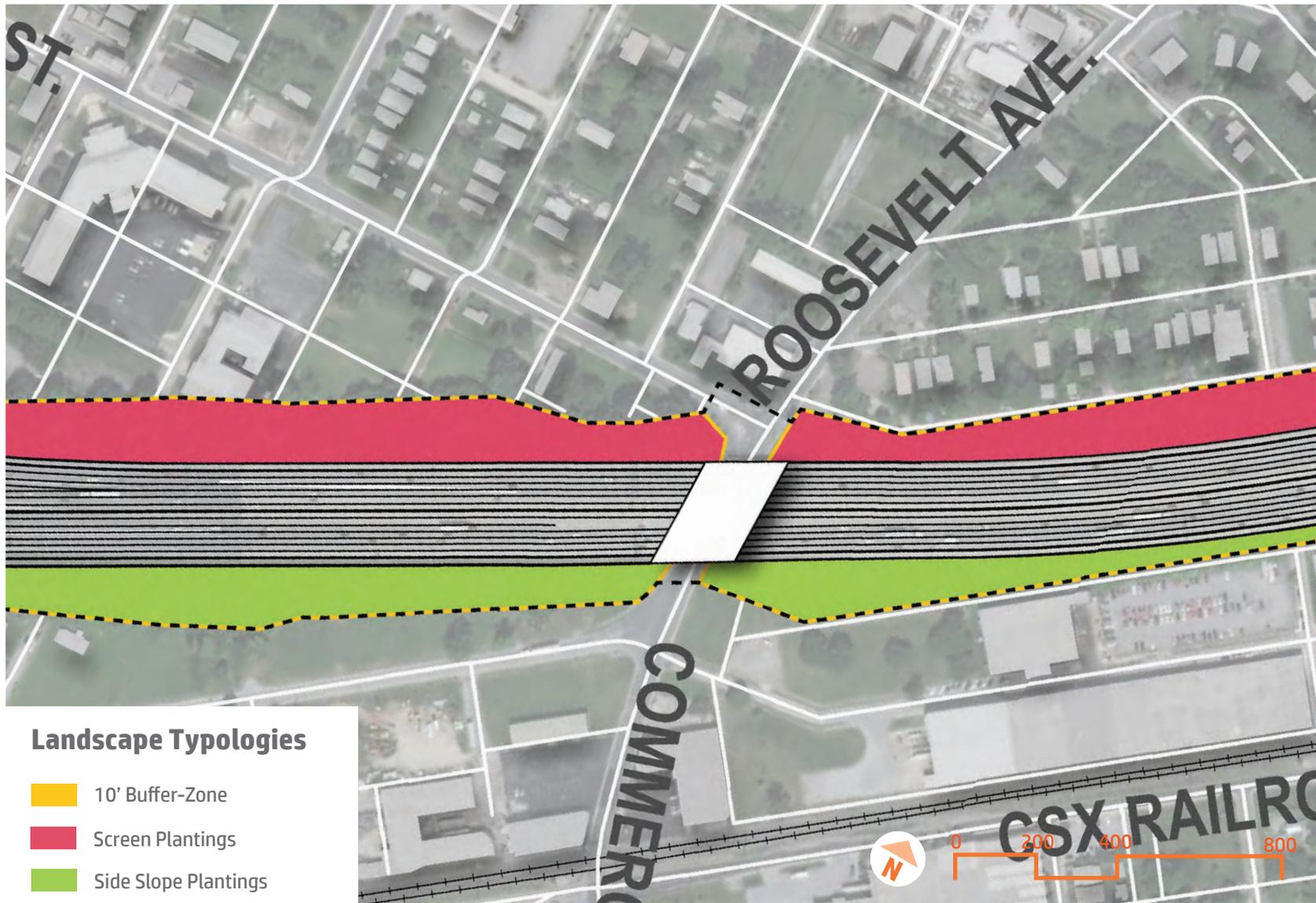
**A. WEST LEG**



**B. SOUTH LEG BETWEEN 10TH STREET AND MICHIGAN STREET**



**C. SOUTH LEG BETWEEN MICHIGAN STREET AND WASHINGTON STREET**



**D. EAST LEG**

# QUANTITIES FOR COST ESTIMATING

## Summary

The information provided outlines the total square feet of each typology and then the square feet of each plant material that makes up the typology. The square footage follows the design guidelines and parameters of placement for all plant material.

Seed coverage and on-center plant spacing are provided, and shall be followed for the unique conditions of each typology.

The plantings will follow Keep Indianapolis Beautiful's (KIB) planting standard of 15' on-center maximum spacing for all deciduous shade and ornamental trees. Evergreen screen trees will differ at a 10' on-center maximum spacing. Small deciduous and evergreen shrubs will be planted at 4' on-center, while large deciduous shrubs will be planted at 8' on-center. Plugs will be planted at 6" on-center.

**Typology 1: Tree Preservation Areas** Approximate Total Square Feet: 187,300

**Typology 2: 10' Buffer-Zone** Approximate Total Square Feet: 247,600

***NO-MOW, ECO-LAWN SEED MIX* Square Feet of Coverage: 247,600**

Coverage applied at a rate of 220 PLS (Pure Live Seed) pounds per acre.

**Typology 3: Side Slope Plantings** Approximate Total Square Feet: 1,528,200

***SLOPE STABILIZATION SEED MIX* Square Feet of Coverage: 1,528,200**

Coverage applied at a rate of 60 PLS (Pure Live Seed) pounds per acre

***NATIVE GRASSES* Square Feet of Coverage: 68,400**

Plugs, Planted 6" On-Center

***NATIVE FORBS* Square Feet of Coverage: 68,400**

Plugs, Planted 6" On-Center

***SMALL SHRUBS* Square Feet of Coverage: 278,280**

Minimum 3-Gallon Container, Planted 4' On-Center

***LARGE, DECIDUOUS SHRUBS* Square Feet of Coverage: 278,280**

Minimum 3-Gallon Container, Planted 8' On-Center

***ORNAMENTAL TREES* Square Feet of Coverage: 278,280**

5-6' Tall, Planted at 15' On-Center

***SHADE TREES* Square Feet of Coverage: 278,280**

Minimum 2" Caliper, Planted at 15' On-Center

# QUANTITIES FOR COST ESTIMATING

## **Typology 4: Screen Plantings**

Approximate Total Square Feet: 378,500

### ***SLOPE STABILIZATION SEED MIX* Square Feet of Coverage: 378,500**

Coverage applied at a rate of 60 PLS (Pure Live Seed) pounds per acre

### ***LARGE, DECIDUOUS SHRUBS* Square Feet of Coverage: 23,655**

Minimum 3-Gallon Container, Planted 8' On-Center

### ***ORNAMENTAL TREES* Square Feet of Coverage: 23,655**

5-6' Tall, Planted at 15' On-Center

### ***COLUMNAR TREES* Square Feet of Coverage: 23,655**

Minimum 2" Caliper, Planted at 10' On-Center

### ***SHADE TREES* Square Feet of Coverage: 23,655**

Minimum 2" Caliper, Planted at 15' On-Center

### ***EVERGREEN TREES* Square Feet of Coverage: 189,250**

Minimum 6' Tall, Ball and Burlap Planted at 10' On-Center

# QUANTITIES FOR COST ESTIMATING

## **Typology 5: Interchange Plantings**

Approximate Total Square Feet: 1,476,900

### ***PRAIRIE SEED MIX* Square Feet of Coverage: 1,476,900**

Coverage applied at a rate of 40 PLS (Pure Live Seed) pounds per acre

### ***NATIVE WILDFLOWER SEED MIX* Square Feet of Coverage: 1,476,900**

Coverage applied at a rate of 5 PLS (Pure Live Seed) pounds per acre

### ***ORNAMENTAL TREES* Square Feet of Coverage: 492,300**

5-6' Tall, Planted at 15' On-Center

### ***SHADE TREES* Square Feet of Coverage: 984,600**

Minimum 2" Caliper, Planted at 15' On-Center

## **Typology 6: Detention Basin Plantings**

Approximate Total Square Feet: 437,700

### ***STORMWATER SEED MIX* Square Feet of Coverage: 291,800**

Coverage applied at a rate of 35 PLS (Pure Live Seed) pounds per acre

### ***PRAIRIE SEED MIX* Square Feet of Coverage: 145,900**

Coverage applied at a rate of 40 PLS (Pure Live Seed) pounds per acre

### ***LARGE, DECIDUOUS SHRUBS* Square Feet of Coverage: 145,900**

Minimum 3-Gallon Container, Planted 8' On-Center

### ***SHADE TREES* Square Feet of Coverage: 145,900**

Minimum 2" Caliper, Planted at 15' On-Center

# TPOLOGY TREE PRESERVATION AREAS

## Design Intent

Tree Preservation Areas protect trees that are deemed “significant” to the landscape. The tree preservation areas are included in the final “Do Not Disturb” areas for the project site.

Further details about tree preservation in the I-65/I-70 North Split Project can be referenced from the Section 106 Consultation Process and should correspond with the final “Do Not Disturb” project limits.

## Design Concept ‘The Nature Reserve’

Protect trees throughout all phases of construction, keeping valued natural elements existing within the city.

## Benefits

- Retain visual interest
- Protect environmental health
- Provide erosion control

## Tree Values

Trees provide lifelong environmental and aesthetic benefits that improve community quality of life. Trees add value to their surroundings by preserving water and soil quality, removing pollutants from the air, lowering surface and air temperatures and providing habitat for wildlife. While trees are some of our most valuable urban assets, they are vulnerable to environmental conditions.

## Tree Protection

Trees have basic needs for survival and growth. Water and soil nutrients must be managed to maintain their health, safety and appearance. If not properly protected, construction activities such as soil compaction, grading, improper root and limb pruning, bark injury, incorrect storage of construction materials and dumping of waste can cause stress and damage to trees. However, in most cases, trees will survive if separated from construction equipment and materials.

Various professionals are involved in protecting trees throughout the construction process, including arborists, landscape architects, engineers, planners and municipal agencies. Protecting trees takes time, money and communication. All phases of construction should include tree protection procedures.

According to the Penn State Extension’s *A Guide to Preserving Trees in Development Projects*, Tree preservation occurs during the entire construction process:

## Pre-construction

- Tree inventory
- Planning, design, negotiations
- Removals
- Staking of construction footprints under trees—required limb pruning
- Insect control or other care
- Fencing preserved trees

## Construction

- Communication and education
- Protection zones
- Required root pruning
- Maintenance of fencing
- Monitoring tree health
- Tree care

## Post-Construction

- Communication and education
- Protecting
- Tree care

\*Locations for the tree preservation areas can be found in the map on page 40.

# TYOLOGY BUFFER- ONES

## 10' Buffer-Zones

The 10' Buffer-Zones are intended to maintain a set-back for plantings so there is no interference between the landscaped areas and roadway functions, as well as providing unobstructed views.

## Design Concept 'The Lawn'

The Buffer-Zones provide a uniform edge around all plantings allowing for a "naturalized" look, while keeping a manicured appearance of turf amongst the urban context. This appearance is created through the use of a "low-to-no-mow" seed mix.

## Benefits

- Minimizes costs associated with mowing and maintenance
- Creates a safe, open buffer zone along the roadway
- Provides order to naturalized plantings

## Why 10' Buffer-Zones?

The buffer zone is located in the areas between the back-of-curb along all local roadways and plantings, between property owner lines and plantings, and between any trails/walks and plantings. Along roadways, this area helps to increase visibility for drivers at road edges and corners. They are flexible-use spaces offering potential driver and pedestrian amenities, such as street trees and sidewalks, that are dependent upon context conditions. Ten feet was determined an appropriate buffer width, however, this width is able to change with the unique context conditions.

## SUGGESTED SEED MIX COMPOSITION:

### **NO-MOW, ECO-LAWN SEED MIX**

**The mix shall include, but is not limited to, an equal blend of the following species and be applied at a rate of 220 PLS (Pure Live Seed) pounds per acre.**

*Shoreline Creeping Red Fescue* exhibits both salt tolerance and Rapid Blight resistance, as well as excellent heat and drought tolerance.

*Class One Creeping Red Fescue* thrives in both sun and shade with little to no irrigation and performs well in high heat and under reduced maintenance.

*SR3150 Hard Fescue* is among the most heat and drought tolerant of all fine fescues and requires minimal water and fertilization in both sun and shade.

*Quatro Sheep Fescue* is low growing and establishes rapidly from seed, yet it's one of the slowest growing grasses available. It also exhibits excellent drought and heat tolerance.

*Carson Chewings Fescue* makes a very high quality turf and is the most competitive of the fine fescues helping to crowd out weeds.



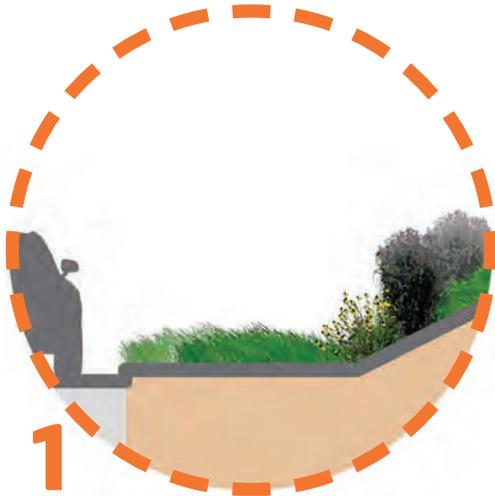
Wildflower Farm via Creston  
Eco-lawn natural appearance on slope.



Wildflower Farm via Yvonne  
Eco-lawn mown versus natural appearance.

# TYOLOGY

# BUFFER- ONES



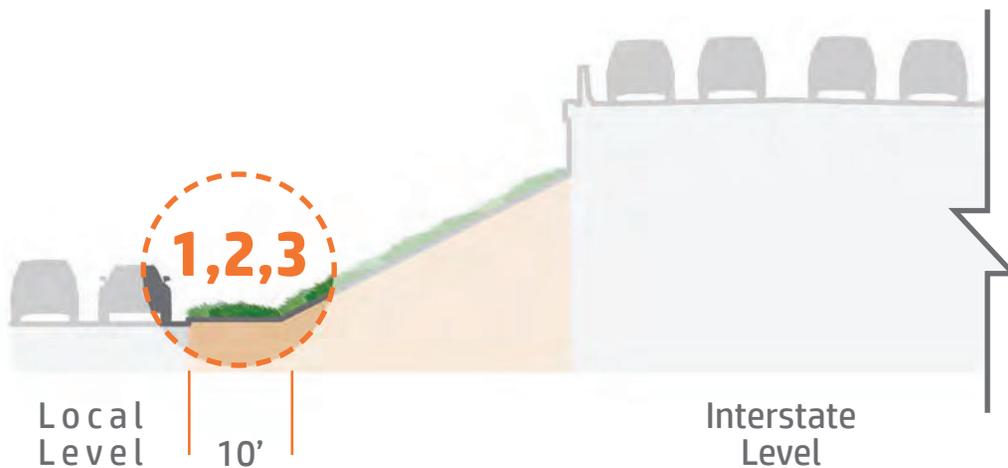
**Standard Condition:** Buffer-Zone Lining Local Level Roadway Edges



**Potential Condition:** Street Tree at Local Level as part of the Buffer-Zone



**Potential Condition:** Street Tree and Pedestrian Walk at Local Level as part of the Buffer-Zone



Note: The Buffer-Zones also occur in the areas between side slopes and property lines, as well as along the edge of any trails/walks.

## 10' Mown-Buffer-Zone Scenarios

# TPOLOGY SIDE SLOPE PLANTINGS

## Design Intent

Plants, rather than extended infrastructure, can be used for erosion control and soil stabilization along the interstate embankments as a cost-effective and less- infrastructure dependent option.

## Design Concept: ‘The Uplands’

Species of the upland plant community provide a root system for erosion control measures and adapt to the constructed terrain.

## Benefits

- Unifies the east, west and south legs through repetition of plant massing and grouping
- Addresses erosion control concerns with an aesthetic solution
- Minimizes costs associate with mowing and maintenance
- Supports native flora and fauna

## SUGGESTED SEED MIX COMPOSITION:

### *SLOPE STABILIZATION SEED MIX*

The seed mix shall include deep-rooted, native species suited for sloped sites and erosion control with the following composition:

**Approximately 20% Permanent Grass/ Sedge Species Seed and 80% Temporary Cover Species Seed applied at a rate of approximately 60 PLS (Pure Live Seed) pounds per acre.**

This planting application shall be used along the east, west and south interstate leges, in areas where steepness of grade creates erosion control concerns and locations where design can rely on the use of planted slopes rather than built structures for retention of terrain. Tree canopies CANNOT overhang the interstate level roadway.

### Side Slope Plantings General Guidelines:

- Plantings (unrelated to seed mixes) should be staggered in mass and placed parallel to contours, dispersing run-off rather than concentrating water flow between plant rows.
- Species with deep and/or wide spreading roots should be incorporated for soil stabilization.
- Broadleaf species should be incorporated to help with impact dispersion of rainfall.
- Protective covering should be used to protect seed from weather and wildlife until maturation - erosion control blankets, vegetated core logs, cover crop, etc.



Cardno Native Plant Nursery  
Slope Stabilization Seed Mix



Minnesota Dept. of Transportation  
Slope planting - forbs & grasses.



Minnesota Dept. of Transportation  
Slope planting - forbs and grasses.

# TPOLOGY SIDE SLOPE PLANTINGS

## Suggested Species Summary

The North Split Aesthetic Design Guidelines document provides suggestions for expanded plant palettes, some outside of standard INDOT and KIB plantings, that respond to the design concept of each typology. This is applicable to the suggested mixes and species for all typologies.

### SUGGESTED PLANT SPECIES:

#### Native Grasses

##### Plugs, Planted 6” On-Center

- Sideoats Grama (*Bouteloua curtipendula*)
- Switchgrass (*Panicum virgatum*)
- Little Bluestem (*Schizachyrium scoparium*)
- Prairie Dropseed (*Sporobolus heterolepis*)



Switchgrass



Little Bluestem

#### Native Forbs

##### Plugs, Planted 6” On-Center

- Butterfly Weed (*Asclepias tuberosa*)
- Purple Coneflower (*Echinacea purpurea*)
- New England Aster (*Symphotrichum novae-angliae*)
- Yellow Coneflower (*Ratibida pinnata*)



Prairie Dropseed



Asclepias tuberosa

#### Small Evergreen Shrubs

##### Minimum 3-Gallon Container, Planted 4’ On-Center

- Juniper (*Juniperus virginiana* ‘Grey Owl’)



Echinacea Purpurea



New England Aster

#### Small, Deciduous Shrubs

##### Minimum 3-Gallon Container, Planted 4’ On-Center

- Black Chokeberry (*Aronia melanocarpa*)
- New Jersey Tea (*Ceanothus americanus*)
- Virginia Sweetspire (*Itea virginica*)
- Fragrant Sumac (*Rhus aromatica*)



Grey Owl Juniper



Chokeberry

# TYOLOGY SIDE SLOPE PLANTINGS

## SUGGESTED PLANT SPECIES (continued):

### Large, Deciduous Shrubs

Minimum 3-Gallon Container, Planted 8' On-Center

- Winterberry (*Ilex verticillata*)
- Smooth Sumac (*Rhus glabra*)
- Arrowwood Viburnum (*Viburnum dentatum*)

### Ornamental Trees

5-6' Tall, Planted at 15' On-Center

- Serviceberry (*Amelanchier x grandiflora*)
- Redbud (*Cercis canadensis*)
- Flowering Dogwood (*Cornus florida*)
- Green Hawthorn (*Crataegus viridis*)

### Shade Trees

Minimum 2" Caliper, Planted at 15' On-Center  
See "Shade Trees" under *Typology 4: Screen Plantings* section for Appropriate Species



Itea virginica



Fragrant Sumac



Winterberry



Smooth Sumac



Arrowwood Viburnum



Serviceberry



Redbud



Flowering Dogwood

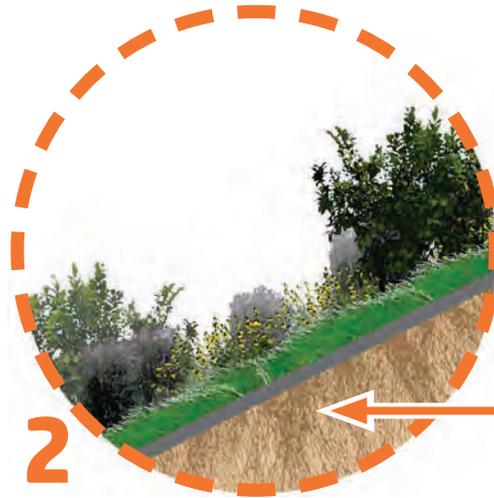


Green Hawthorn

# TYOLOGY SIDE SLOPE PLANTINGS



**1**  
Seed Mix

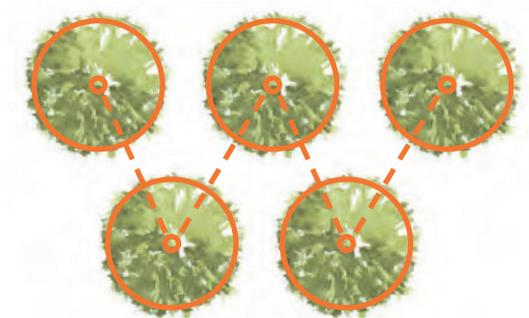


**2**  
Seed Mix + Shrubs

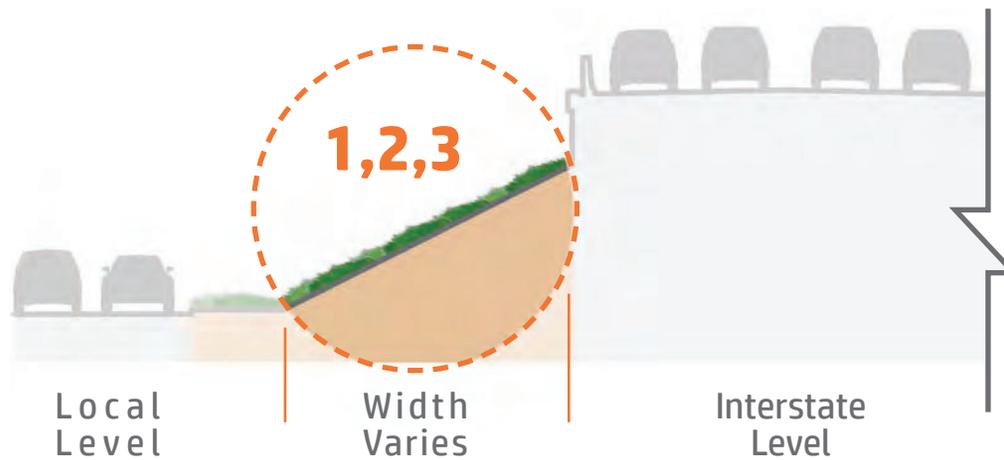


**3**  
Seed Mix + Shrubs + Trees

Deep-rooted, native plants create a fibrous root system for embankment stabilization.



Staggered planting layouts for shrubs & trees assist with erosion control.



## Side Slope Plantings Scenarios

# TYOLOGY SIDE SLOPE PLANTINGS



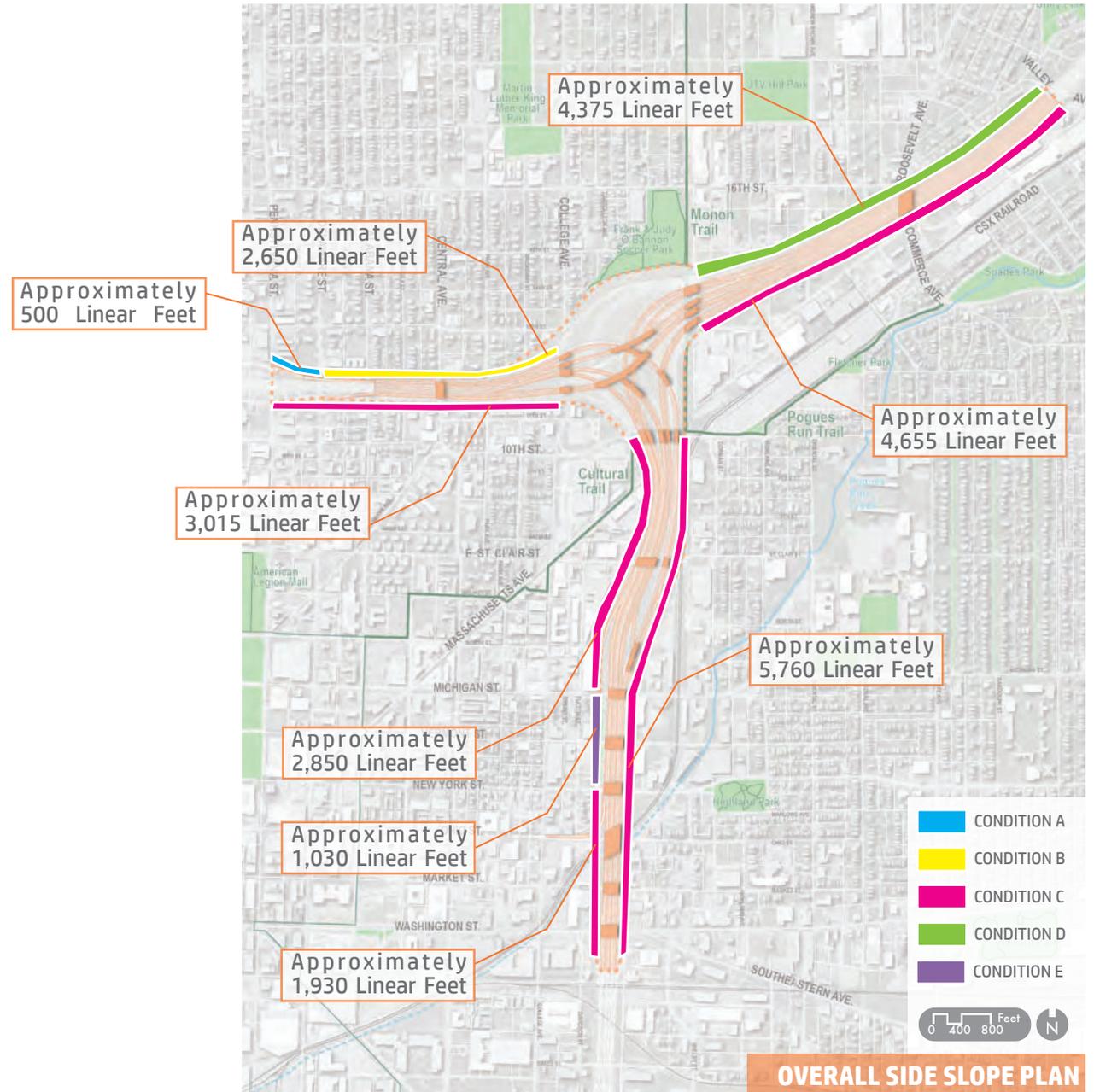
No-Mow, Eco-Lawn Seed Mix is not needed in locations where traffic barriers exist. It is instead planted with the indicated grass/sedge/forb mix for the given typology.

**Interstate Street View Looking North (Approaching I-70 East Leg) of Slope Plantings**

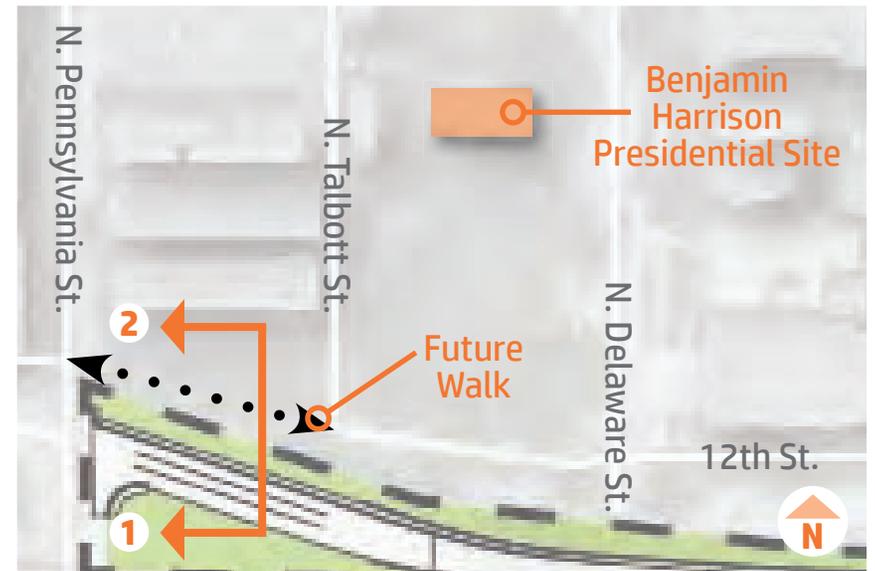
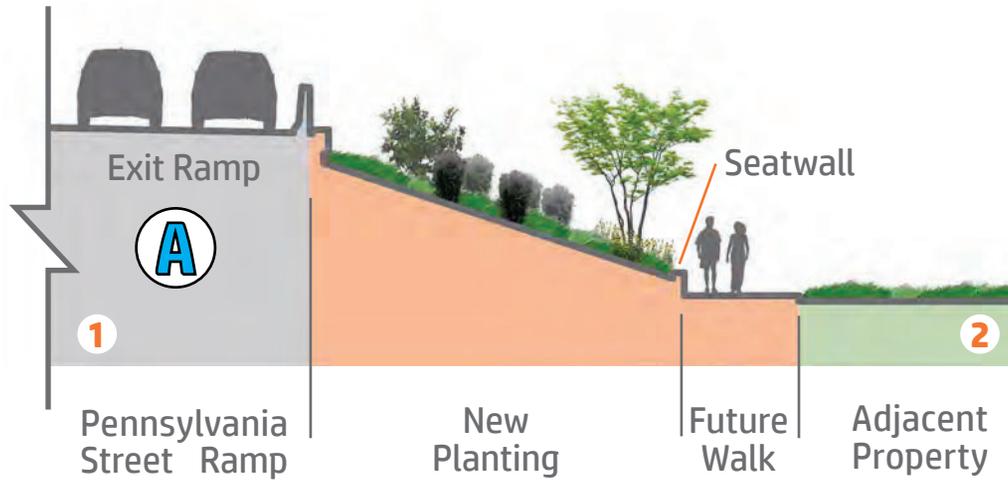
# TPOLOGY TYPICAL SIDE SLOPE CONDITIONS

## Characteristics of Slopes

- Integrate landform design, grading, drainage and detention basin configuration with landscaping of interchange
- Grade embankments to slopes that are safely maintainable and eliminate rip-rap
- Configure ditches, swales, and detention basins to appear natural



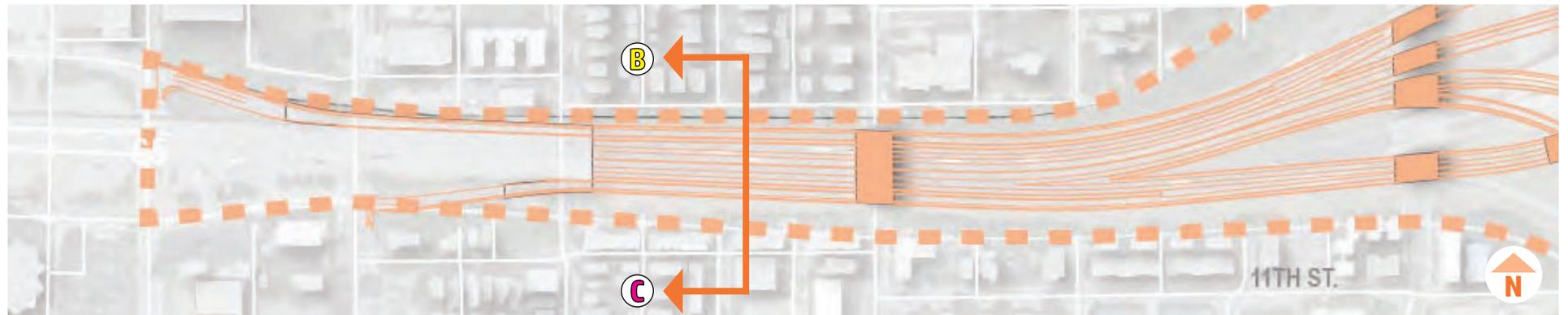
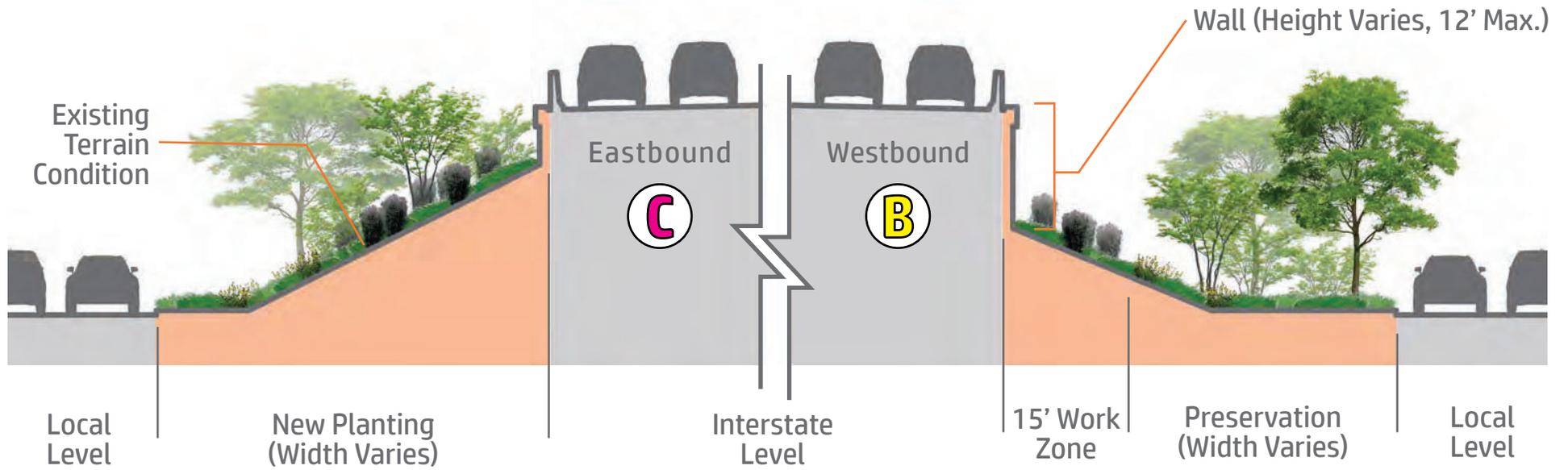
# TYOLOGY CONDITION A



**West Leg Pennsylvania Street Ramp Side Slope Conditions (Not to Scale)**

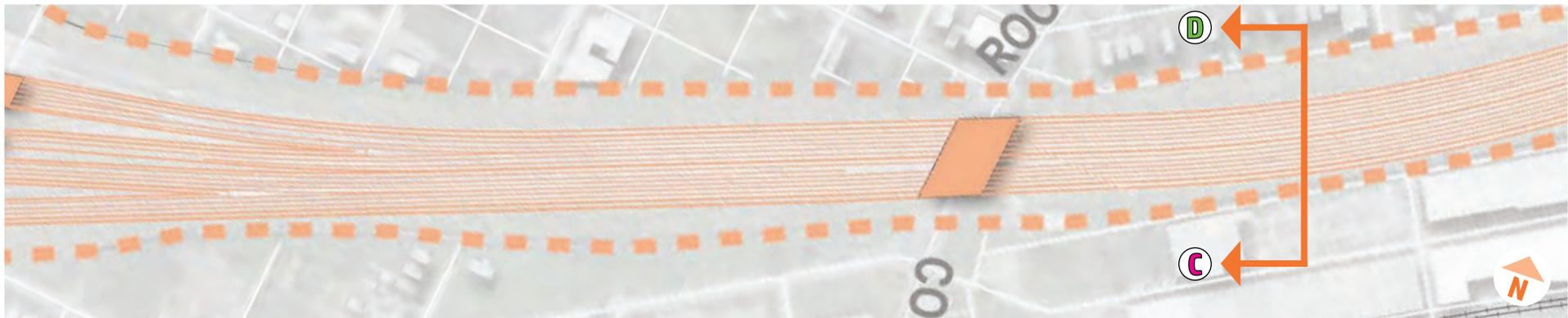
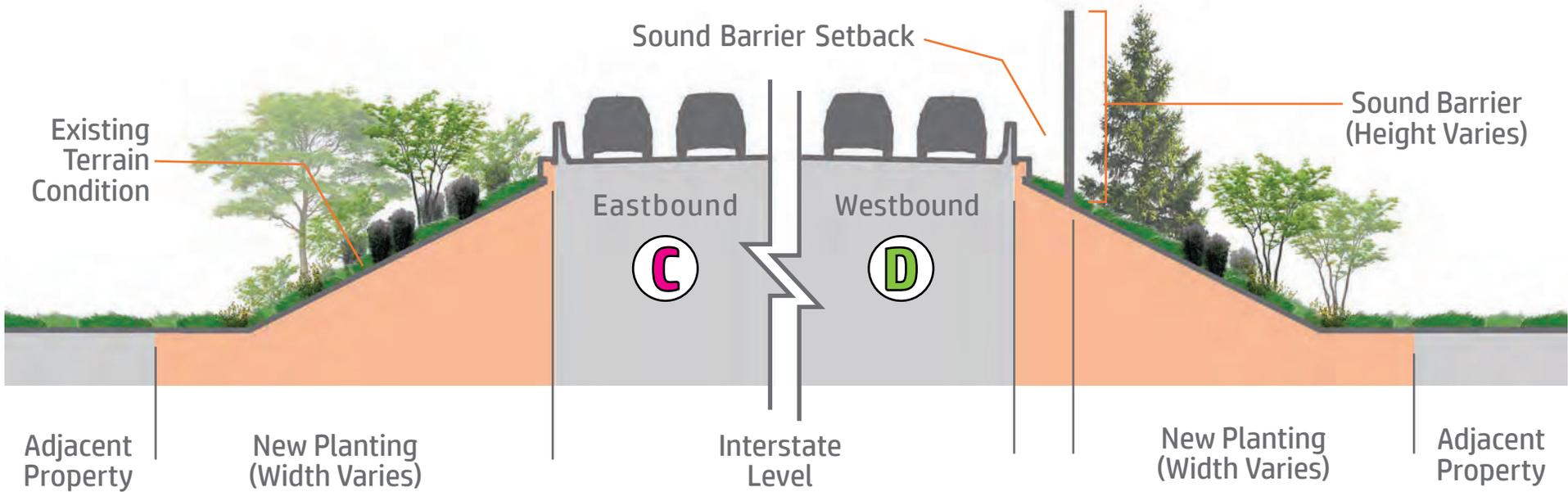
\*Note: Construction of the future walk will be completed by others, outside of the project Right of Way, and its distance in relation to the seatwall is subject to change.

# TYOLOGY CONDITIONS C B



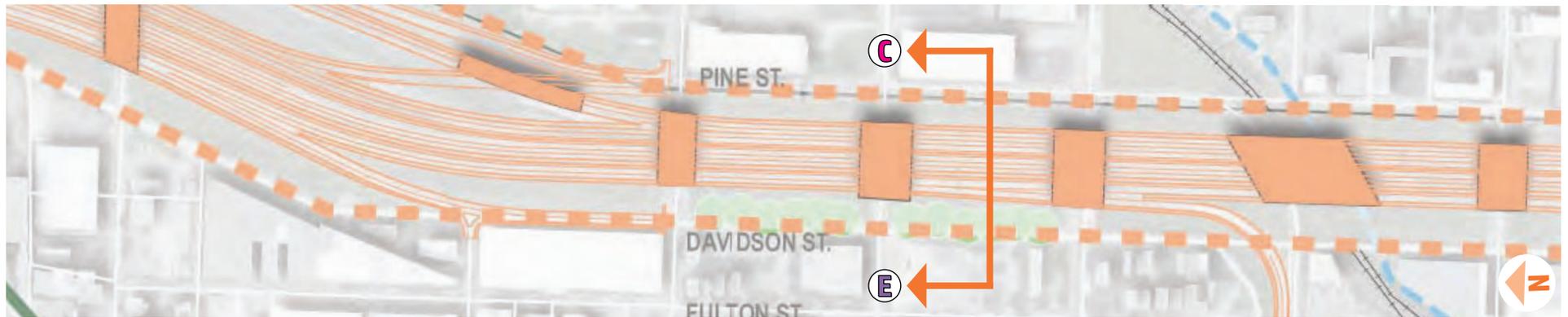
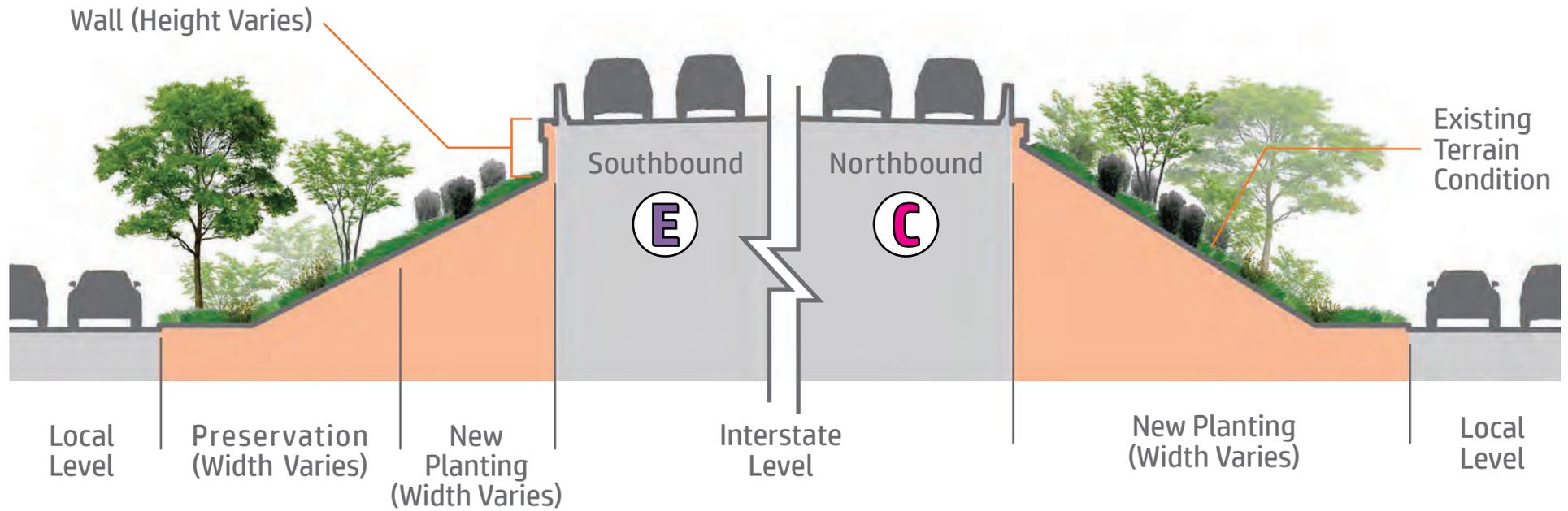
**West Leg Slope Conditions (Not to Scale)**

# TYOLOGY CONDITIONS C D



**East Leg Slope Conditions (Not to Scale)**

# TYOLOGY CONDITION E C



**South Leg Slope Conditions (Not to Scale)**

# TPOLOGY SCREEN PLANTINGS

## Design Intent

Plants can minimize and soften the appearance of sound barriers.

## Design Concept: 'The Woodlands'

The massing of evergreen and deciduous plants at the base of sound barriers can create a natural backdrop that mimics a woodland edge transition, when viewed from adjacent properties.

## Benefits:

- Reduces the visual prominence of sound barriers
- Creates a visually interesting buffer and soft edge
- Offers a natural backdrop to neighboring communities

## Screen Plantings General Design Guidelines:

- Plantings to screen should be used to mitigate scale between the interstate and neighborhoods.
- Screens need to have a vertical emphasis to provide maximum screening coverage.
- Arrangement should provide pedestrian and vehicular overhead along walks, trails, and roadways - at local street fronts.
- Plantings should include a 2:1 ratio of evergreen to deciduous species, offering year-round screening.
- Species variation is important but may require focus on deciduous varieties that are columnar in form for plants to fit the allotted space.
- Plantings will be placed along side slopes, at the base of sound barriers.

## SUGGESTED SPECIES:

### Large, Deciduous Shrubs

See "Large, Deciduous Shrubs" under the *Typology 3: Side Slope Plantings* section for Appropriate Species

### Ornamental Trees

See "Ornamental Trees" under the *Typology 3:*

*Side Slope Plantings* section for Appropriate Species

## Columnar Trees (applicable to narrow locations) Minimum 2" Caliper, Planted at 15' On-Center

- Sweetgum (*Liquidambar styraciflua* 'Slender Silhouette')
- Pin Oak (*Quercus palustris* 'Green Pillar')
- Freeman Maple (*Acer x freemanii* 'Armstrong')
- European Hornbeam (*Carpinus betulus* 'Fastigiata')



Slender Silhouette Sweetgum



Green Pillar Pin Oak



Freeman Maple



Upright European Hornbeam

# TPOLOGY SCREEN PLANTINGS

## SUGGESTED SPECIES (continued):

### Shade Trees (applicable along local street front) Minimum 2" Caliper, Planted at 15' On-Center

- Red Maple (*Acer rubrum*)
- Honey Locust (*Gleditsia triacanthos var. inermis*)
- Red Oak (*Quercus rubra*)
- American Elm (*Ulmus americana* 'Princeton')



Red Maple



Red Oak



Honeylocust



American Elm

### Shade Trees Installation Guidelines

- Trees should be placed so that canopies do not overhang the interstate level.
- Trees should be placed to grow together upon maturation.

### Evergreen Trees Minimum 6' Tall, Ball and Burlap Planted at 10' On-Center

- Arborvitae (*Thuja* 'Green Giant')
- Red Cedar (*Juniperus virginiana* 'Burkii')
- Red Cedar (*Juniperus virginiana* 'Canaertii')



Green Giant Arborvitae



Burkii Eastern Red Cedar



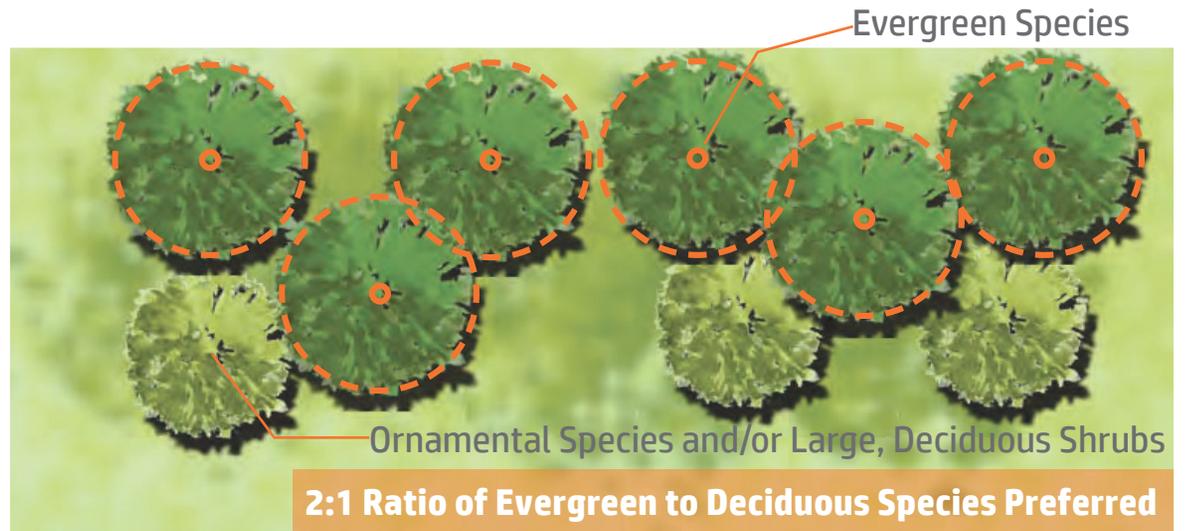
Canaertii Eastern Red Cedar

### Evergreen Trees Installation Guidelines

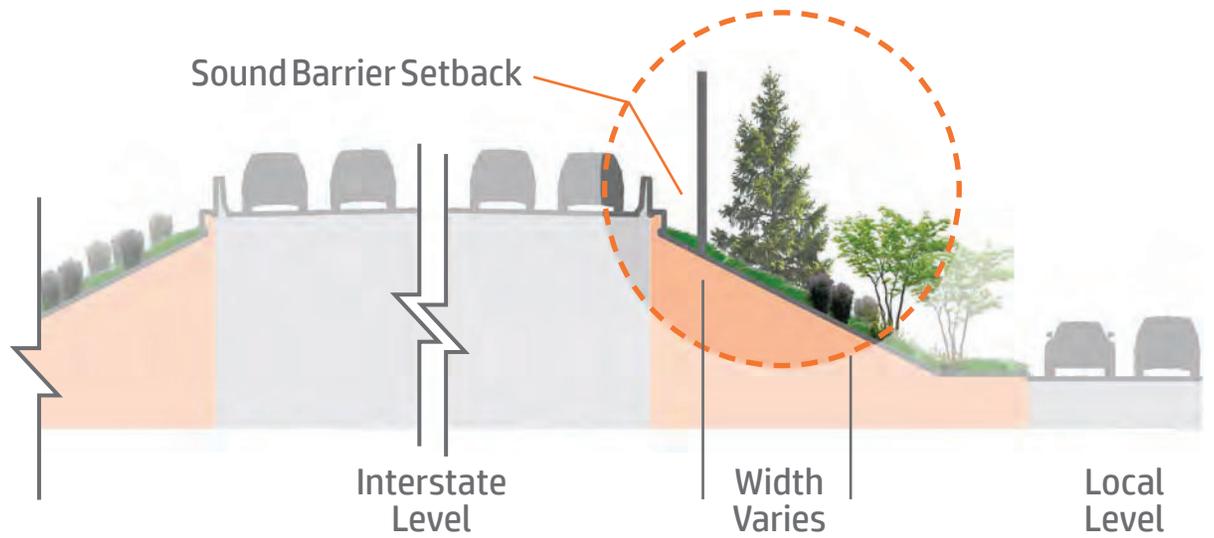
- Trees should be placed so bases do not overhang the buffer-zone.
- Trees should be placed to grow together upon maturation.

# TYOLOGY SCREEN PLANTINGS

Spacing between screen tree plantings to be a min. of 10'. Plants should be staggered in placement, as seen in diagram on page 54.



Trees (particularly evergreen species) shall be placed so that they grow together to form a “green wall”. A 2:1 ratio of evergreen to deciduous species is needed in order to achieve this effect as well as a maximum spacing of 10’ on-center. Any location where a sound barrier is implemented, a screen will be used to camouflage and soften the appearance.



**Screen Plantings with Sound Barrier**

# TYOLOGY INTERCHANGE PLANTINGS

## Design Intent

Plants can give purpose to expansive spaces in a manner that is low in cost and required maintenance, but high in visual quality. Over time, the maturation of trees in this area will create a more dense canopy that will begin to take on characteristics of some stakeholder desires to create an “urban forest.” This is essentially the heavy massing of trees to create an urban vegetative treatment style.

## Design Concept: ‘The Prairie’s Edge’

The seeding and planting of large, open areas with mixes of native grasses, sedges and forbs, as well as a variety of tree species, responds to the public’s desire for a natural-feel landscape juxtaposed against the urban setting.

## SUGGESTED SEED MIX COMPOSITION:

### **PRAIRIE SEED MIX**

This planting application shall be used in areas within the interchange.

The mix shall include native prairie grasses, sedges and flowering species that provide color throughout the growing season and act as food sources for birds, butterflies and insects with the following composition:

**Approximately 20% Permanent Grass/Sedge Species Seed, 10% Forb Species Seed and 70% Temporary Cover Species Seed applied at a rate of approximately 40 PLS (Pure Live Seed) pounds per acre.**

### **NATIVE WILDFLOWER SEED MIX**

This planting application shall be used to supplement the *Prairie Seed Mix*, offering more color and diversity in blooming species, particularly during prairie establishment.

It shall include quick-blooming, native wildflowers that are beneficial to native bees and pollinators with the following composition:

**100% Flowering Forb Species Seed applied at a rate of approximately 5 PLS (Pure Live Seed) pounds per acre.**

## Seed Mix Installation Guide

- Protective covering shall be used to protect seed from weather and wildlife.
- Installation recommendations from the supplier shall be followed.



# TYOLOGY INTERCHANGE PLANTINGS

## Benefits

- Softens the road infrastructure with large, plant massing
- Unifies the interchange with the legs in repetition of seed species
- Minimizes costs associated with mowing and maintenance
- Supports native flora and fauna

## SUGGESTED SPECIES:

### Shade Trees (applicable to the interchange 'urban forest') Minimum 2" Caliper, Planted at 15' On-Center

- Tulip Tree (*Liriodendron Tulipifera*)
- American Beech (*Fagus grandifolia*)
- Black Gum (*Nyssa sylvatica*)
- American Linden (*Tilia americana*)
- Sugar Maple (*Acer saccharum*)
- Red Maple (*Acer rubrum*)
- Honey Locust (*Gleditsia triacanthos var. inermis*)
- Red Oak (*Quercus rubra*)
- American Elm (*Ulmus americana 'Princeton'*)

### Ornamental Trees (grouped along the edges of the No-Tree-Buffer-Zones, as shown on the next two pages)

#### 5-6' Tall, Planted at 15' On-Center

- Serviceberry (*Amelanchier x grandiflora*)
- Redbud (*Cercis canadensis*)
- Flowering Dogwood (*Cornus florida*)
- Green Hawthorn (*Crataegus viridis*)

#### Interchange Tree Installation Guidelines

- Trees should be planted in a grid pattern at a maximum of 15' o.c.
- Trees with messier seeds/fruits are planted further within the interchange.



Tulip Tree



American Beech



Black Gum



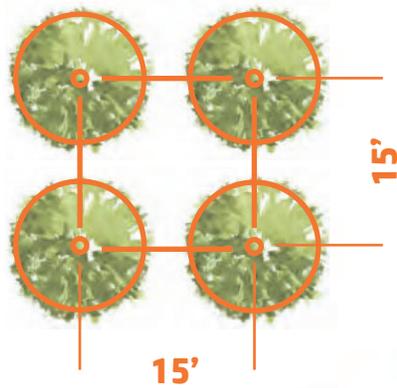
American Linden



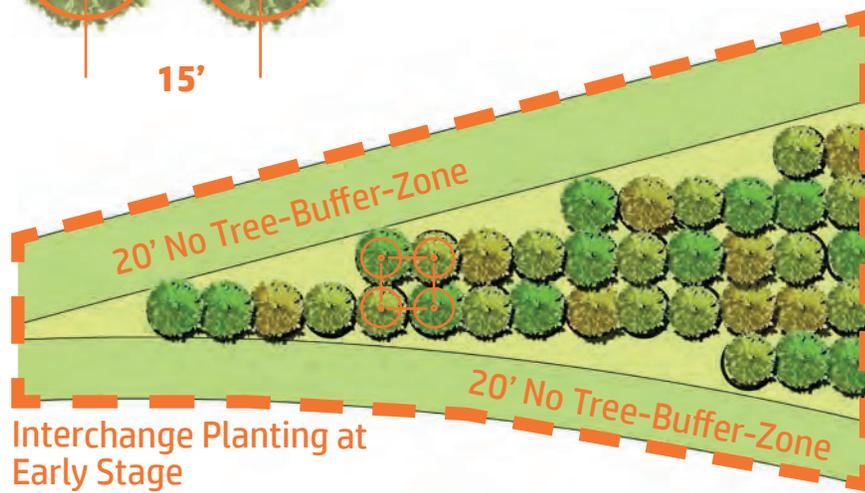
Sugar Maple

# TYOLOGY INTERCHANGE PLANTINGS

## CANOPY TREES

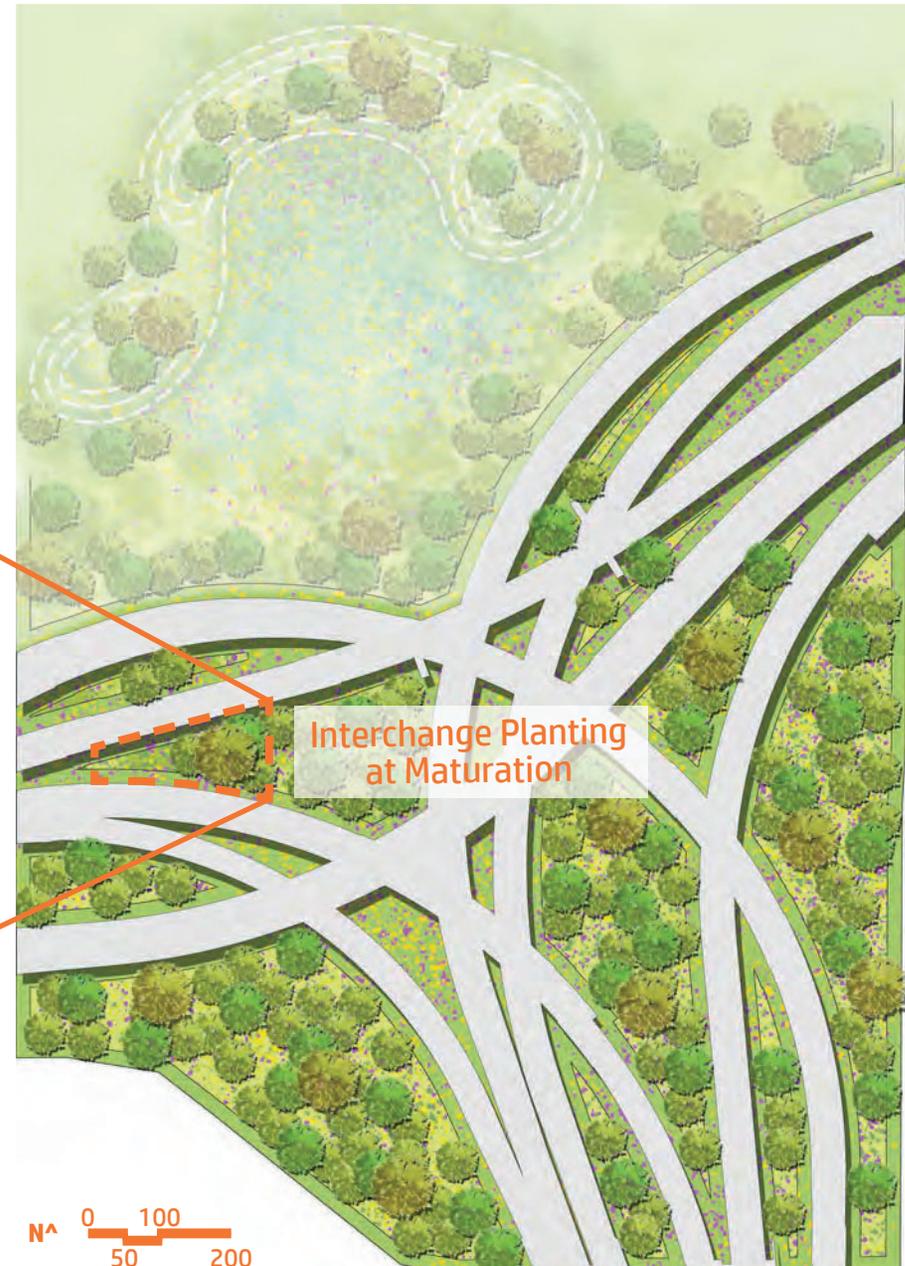


The illustrations to the left and below show the use of a fractured grid pattern for the placement of trees within the interchange.



The approach to planting such a space shall be one of restorative quality - planting large quantities in close proximity - where survival of the fittest tree specimen will result in a naturalistic appearance. The interchange planting will follow Keep Indianapolis Beautiful's (KIB) planting standard of 15' on-center maximum spacing.

### Canopy Tree Grid Arrangement



# TYOLOGY INTERCHANGE PLANTINGS

## CANOPY TREES

The 20' No-Tree-Buffer-Zone within the interchange is a similar concept to *Typology 2: 10' Buffer-Zone* seen along the local roadways. This 20' No-Tree-Buffer Zone (occurring along the edge of all interstate roadways) is a continuation of the chosen seed mixes that extends from the inner portion of the interchange under any interchange bridges. This zone is void of planted trees, and any interior trees shall be planted so that mature canopy widths DO NOT impede the interstate roadway.



Grouped Ornamental Trees at No-Tree-Buffer-Zone Edge

Aerial View Looking Towards Downtown of the Interchange Plantings

# TYOLOGY DETENTION BASIN PLANTINGS

## Design Intent

A heavily planted area for the purpose of stormwater detention - a dry extended detention basin - is favored over a traditional retention pond for benefits it offers the urban landscape.

## Design Concept: 'The Wetlands'

A detention basin to resemble that of a wetland environment will provide more aesthetic value to the site, minimize the amount of standing water and allow even infiltration.

## Benefits

- Filtrates pollutants from storm water runoff
- Allows for infiltration of otherwise standing water
- Designed alternative to traditional systems, offering aesthetic value
- Blends "natural" and urban environments
- Supports local flora and fauna

## Seed Mix Composition:

### STORMWATER SEED MIX

This planting application shall be used within the interchange for vegetated swales and in lieu of a retention pond.

The seed mix must tolerate highly fluctuating water levels and poor water quality associated with urban stormwater runoff with the following composition:

**Approximately 10% Permanent Grass/Sedge Species Seed, 5% Forb Species Seed and 85% Temporary Cover Species Seed applied at a rate of approximately 35 PLS (Pure Live Seed) pounds per acre.**

### PRAIRIE SEED MIX

See *Typology 5: Interchange Plantings* section for Appropriate Seed Mix

The *Prairie Seed Mix* can be incorporated with the *Stormwater Seed Mix* in the upper third of basins that experience long, dry periods.



Cardno  
Economy Prairie Seed Mix -  
Yellow Coneflower



Cardno  
Stormwater Seed Mix -  
Crested Oval Sedge

## Detention Basin General Design Guidelines:

- Basin design should conform to regulations set by INDOT and local stormwater ordinances (IDEM Storm Water Quality Manual).
- Construct of basins should allow for the slow infiltration of water, with standing water persisting for no less than 24 hours and no longer than 72.
- Basins should be graded in a way that resembles a natural pond bed, having curvilinear and undulating forms.
- Bio-retention areas should be included at inlets/outlets of basins.
- Basin size should be dictated by the watershed coverage of collected runoff.
- Overall shape and side slopes should follow a 4:1, or flatter, ratio in construct.



Perkiomen Watershed Conservancy  
Naturalized Stormwater Detention Basin

# TYOLOGY DETENTION BASIN PLANTINGS

## SUGGESTED SPECIES:

### Large, Deciduous Shrubs Minimum 3-Gallon Container, Planted 8' On-Center

- Sandbar Willow (*Salix interior*)
- Gray Dogwood (*Cornus racemosa*)
- Spicebush (*Lindera benzoin*)
- Elderberry (*Sambucus canadensis*)

### Shade Trees Minimum 2" Caliper, Planted at 15' On-Center

- Bald Cypress (*Taxodium distichum var. distichum*)
- Swamp White Oak (*Quercus bicolor*)
- Black Willow (*Salix nigra*)
- Pin Oak (*Quercus palustris*)



Sandbar Willow



Gray Dogwood



Spicebush



Elderberry



Bald Cypress



Swamp White Oak

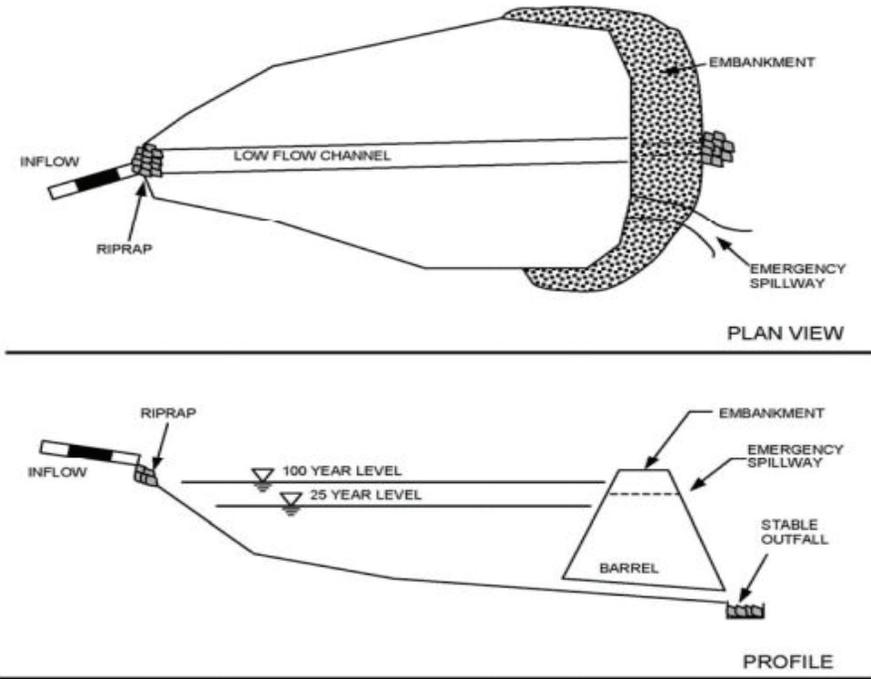


Black Willow



Pin Oak

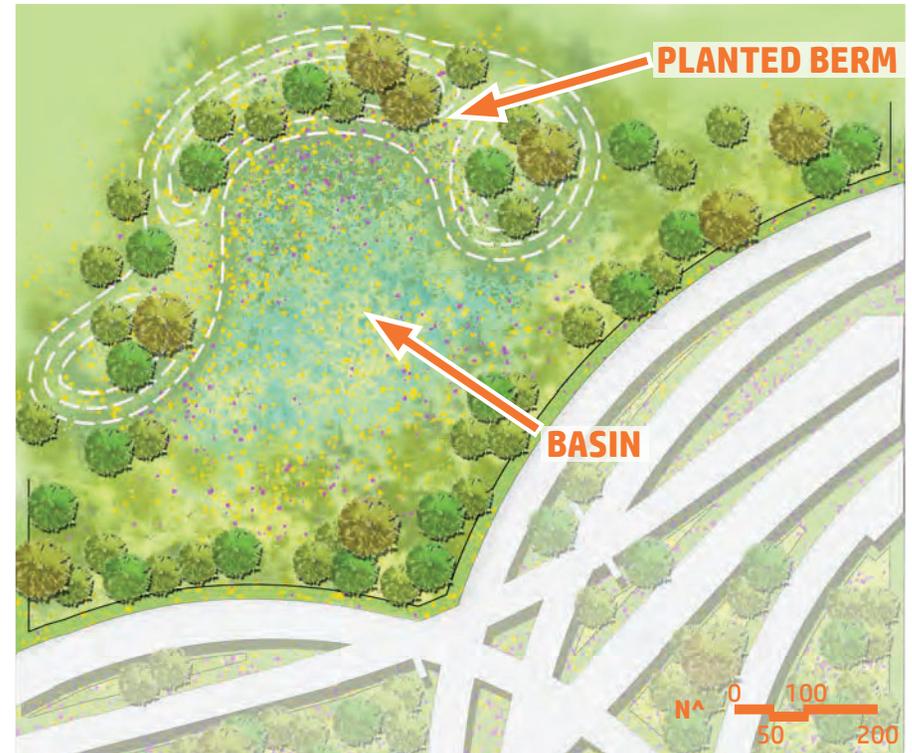
# TYOLOGY DETENTION BASIN PLANTINGS



Source: Georgia Stormwater Management Manual, 2001

The conceptual details above show an overview of how such a basin would be arranged. The area north of the interchange - space gained through the shrinking footprint of the new design - provides a perfect location for this to occur. A sculpted berm can provide aesthetic and functional value in the separation of the basin from public activities of the Frank & Judy O'Bannon Soccer Park.

## Detention Basin Conceptual Design



University of Illinois  
Planted Dry-Detention Basin

Attachment D – Memorandum of Understanding Among the Federal Highway Administration, Indiana State Historic Preservation Officer, Indiana Department of Transportation, and Federally Recognized Tribes Interested in Indiana Lands Regarding Tribal Consultation Requirements for the Indiana Federal Transportation Program (Appendices Removed)

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

**PREFACE**

This Memorandum of Understanding (MOU) is the result of discussions among the Federal Highway Administration (FHWA), the Indiana Department of Transportation (INDOT), the Indiana State Historic Preservation Officer (SHPO), and federally recognized Tribes whose ancestral homelands include the State of Indiana (Tribes)<sup>1</sup>. This document is intended to define and develop procedures for consultation in compliance with the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.), among the FHWA, INDOT, and Tribes. As required under the terms of the NHPA and resulting regulations (36 C.F.R. Part 800), consultation has revealed that many Tribes have aboriginal ties to what is now the State of Indiana. Those Tribes have requested to be consulted on future transportation projects in Indiana.

The FHWA and INDOT understand that cultural resources are revered by the Tribes and are a connection to their past and important to their cultural identity, sense of self and future well-being. Tribes are concerned with the continuing destruction of places and items of cultural value, including cultural resources, burial sites, and Traditional Cultural Properties (TCPs)<sup>2</sup>. The destruction of these resources impacts Tribal cultural identity today. Cultural resources are tied to people's ancestors, some are related to important religious activities, and many have ongoing spiritual connections. The FHWA and INDOT recognize the importance of these cultural resources to aboriginal people living today.

The FHWA and INDOT recognize that transportation projects have the potential to adversely affect historic properties<sup>3</sup>: burials, funerary objects, sacred objects, objects of cultural patrimony, sacred sites, archaeological sites, and TCPs, as well as traditional cultural landscapes<sup>4</sup> and traditional natural resources<sup>5</sup> that may not be eligible and/or protected by the National Register but may still be of value to Tribes. The

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<sup>1</sup> See Appendix A: COUNTY LISTING OF THE TRIBES' ANCESTRAL HOMELANDS AND TERRITORY IN THE STATE OF INDIANA.

<sup>2</sup> A Traditional Cultural Property (TCP) is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that: (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community. (National Register Bulletin 38).

<sup>3</sup> The term "historic property" is defined in the NHPA as, "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion, on the National Register"; such term includes artifacts, records, and remains which are related to such district, site, building, structure, or object (54 U.S.C. § 300308).

<sup>4</sup> Traditional cultural landscapes are understood to be areas considered sacred or culturally significant by tribes that include plants, animals, sound, light, view shed, and other sometimes intangible features that are revered through or described through a tribe's language, songs, stories, ceremonies, and place names (ACHP's The Protection of Indian Sacred Sites: General Information, July 2015. <http://www.achp.gov/docs/sacred-sites-general-info-july-2015.pdf>; accessed December 11, 2015).

<sup>5</sup> Traditional natural resources are understood to be trees, plants, berries, nuts, fruits, minerals, and any floral or fauna species that are considered sacred, medicinal, or culturally important to tribal religious beliefs, traditions, and practices (ACHP's The Protection of Indian Sacred Sites: General Information, July 2015. <http://www.achp.gov/docs/sacred-sites-general-info-july-2015.pdf>; accessed December 11, 2015).

FHWA and INDOT understand that the construction of the modern transportation network typically did not take into account impacts to these resources. The FHWA and INDOT do not wish further destruction of these culturally valued places, and recognize the inherent rights of Tribes to preserve those places that they value.

Modern development, including transportation construction, has the potential to destroy or adversely impact valuable cultural resources. This MOU is intended to ensure that all parties understand which cultural resources are important to Tribes and work together to protect and preserve them, or mitigate for their loss. The FHWA and INDOT are committed to providing a transportation system that will benefit all people of Indiana, both current and historic, and to learning tribal perspectives about cultural resources important to Tribes. The Tribes are committed to understanding transportation issues and the perspectives of the FHWA and INDOT. Jointly, we are committed to establishing a relationship of mutual trust and respect.

It is the intention of the FHWA and INDOT to work with Tribes to find appropriate ways to avoid, minimize or mitigate adverse effects to historic properties. The FHWA and INDOT pledge to always look for ways to avoid adverse effects to historic properties as the first option. When avoidance of adverse effects is impossible or impractical, given other concerns of equal importance, the FHWA and INDOT will work with the Tribes for appropriate and respectful resolution.

INDOT will ensure that the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. § 3001 et seq.) are followed when there is a discovery of human remains, burials or associated funerary objects (AFOs) on federal lands. In the event of a discovery of human remains or burial objects on non-federal lands during transportation planning or construction activities, at a minimum INDOT will comply with all applicable federal and state laws and regulations, including Section 106 of the NHPA of 1966 (54 U.S.C. § 300101 and 36 C.F.R. Part 800), the Indiana Historic Preservation Act (IC 14-21), and Indiana Administrative Code 312 IAC 22 (see III.C.2).

**WHEREAS**, all signatory Tribes identified in Appendix A are federally recognized sovereign, self-governing Indian Tribes with their own tribal laws, with established government-to-government relationships with the United States, and a historical connection to specific areas of Indiana, as shown in Appendix A: “COUNTY LISTING OF THE TRIBES’ ANCESTRAL HOMELANDS AND TERRITORY IN THE STATE OF INDIANA,” and have been consulted and agree to be signatories to this document;

**WHEREAS**, the Indiana SHPO has been consulted and agrees to be a signatory to this document;

**WHEREAS**, the FHWA wish to affirm the government-to-government relationship with the Tribes for consultation and cooperation regarding federal acts and orders including, but not limited to, Section 106 of the National Historic Preservation Act (54 U.S.C. § 300101 et seq.); the National Environmental Policy Act, (42 U.S.C. § 4321 et seq.); the Archaeological Resource Protection Act (16 U.S.C. § 470aa et seq.); Presidential Executive Order 13007 (Indian Sacred Sites); Presidential Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments); Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. § 3001 et seq.); and, the American Indian Religious Freedom Act (42 U.S.C. § 1996);

**WHEREAS**, the FHWA is the federal agency with statutory responsibilities for administering the federal-aid highway program under 23 U.S.C. § 101 et seq., and INDOT administers and oversees federal funds for

state and local transportation projects in Indiana. The FHWA agrees to coordinate under a government-to-government relationship with Tribes with regard to federal responsibilities under Section 106 of the NHPA through the terms of this MOU. INDOT will also consult with Tribes to manage or advise on matters pertaining to cultural resources;

**WHEREAS**, the FHWA has determined that its undertakings may have an effect upon properties included in or eligible for inclusion in the National Register of Historic Places (NRHP). FHWA and INDOT have also determined that its undertakings may have an effect upon traditional cultural landscapes and traditional natural resources that may not be eligible or protected by the National Register but may still be of value to Tribes. Through this MOU, FHWA and INDOT will consult with Tribes pursuant to Section 106 of the NHPA (54 U.S.C. § 300101 et seq.);

**WHEREAS**, the FHWA and INDOT are committed to: 1) avoiding, minimizing, and mitigating adverse effects to historic properties; 2) considering tribal interests in the preservation of significant cultural resources that are important to tribal well-being, growth, and prosperity; and 3) responding to the needs of Tribes;

**WHEREAS**, INDOT will employ departmental staff that meet the federal professional qualification requirements of 36 C.F.R. Part 61 and State of Indiana standards (IC 14-21-1 and 312 IAC 21). At a minimum, the professional staff required to carry out the terms of this MOU shall consist of one permanent, full time archaeologist;

**WHEREAS**, INDOT contracts archaeological fieldwork to only qualified professionals. INDOT will ensure that all consultants conducting archaeological fieldwork meet the federal professional qualification requirements of 36 C.F.R. Part 61 and State of Indiana standards (IC 14-21-1 and 312 IAC 21). INDOT ensures and will continue to ensure that fieldwork and reporting meets federal and state guidelines;

**WHEREAS**, the FHWA, INDOT, and the signatory Tribes aspire to engage in meaningful, long-term planning for the appropriate consideration of cultural resources important to Tribes, and to pursue the following:

- develop a comprehensive and efficient tribal consultation process based upon education and understanding for Section 106 undertakings;
- continue to identify ways to streamline the Section 106 process and procedural requirements;
- recognize that Tribes share the responsibility to engage in effective consultation;
- involve the Tribes' cultural experts to a greater extent and at an earlier point than before the implementation of this MOU;
- devote the time and energy needed to identify relevant transportation problems threatening cultural resources important to the Tribes; and
- accomplish any additional goals identified through consultation and agreed upon by the parties;

**BE IT RESOLVED**, the FHWA, INDOT and Tribes hereby agree that the implementation of tribal consultation on transportation projects shall be established through government-to-government relations with Tribes. At a minimum, consultation will be in accordance with the following stipulations in order to satisfy FHWA tribal consultation responsibilities under the NHPA.

## **STIPULATIONS**

## I. GENERAL

A. This MOU sets forth the process by which FHWA will meet its responsibilities of the Federal Aid Highway Program with regard to tribal consultation under Section 106 of the NHPA for transportation projects within the State of Indiana. This MOU establishes a protocol for consultation with Tribes on individual transportation projects.

B. Nothing in this MOU shall be interpreted to alter the requirements of the NHPA or its implementing regulations. In the event any portion of this MOU is deemed contradictory, or less restrictive, to law or regulation, only that portion becomes void. The sole contradictory provision or issue shall not negate the entire MOU. The parties should consult to resolve the contradictory issue with the intent to reform or amend that portion of the MOU to make it compliant with applicable law or regulation while all remaining provisions of the MOU remain in full force and effect.

C. No portion of this MOU shall be interpreted to limit the rights, duties, or responsibilities of any party as may be required under federal laws, regulations, policies, executive memoranda or executive orders, or Indiana state statutes.

D. Consultation with Tribes shall begin when Section 106 consultation is initiated and before a final transportation alternative is approved. Tribal early coordination shall be sent to ensure tribal views are considered into the decision making process and consultation shall continue throughout a Section 106 undertaking. A letter or email of notification, in and of itself, from FHWA/INDOT to a Tribe is not considered consultation. Consultation is a mutual, meaningful dialogue between FHWA, INDOT, SHPO, and Tribes regarding historic properties that may be affected by an undertaking. The FHWA and INDOT shall consult with Tribes on a government-to-government basis in recognition of its sovereign status as early as possible in the planning process and throughout the Section 106 process, regarding any activity or undertaking that might affect cultural resources of concern to the Tribes.

Consultation may include face-to-face meetings, as well as communications by mail, electronic mail, facsimile, and telephone. When it is determined that consultation will be by a face-to-face meeting, FHWA and INDOT will coordinate with the consulting party Tribes to develop a mutually agreed upon time and place to meet.

Consultation may be extended to include future management, protection, and preservation if historic properties that are of cultural and/or religious significance to Tribes are identified.

E. The FHWA and INDOT shall ensure that Tribes are afforded, in accordance with applicable federal, state, and local authorities and highway safety measures, the opportunity to conduct religious/traditional ceremonies within right-of-way owned by INDOT.

F. The FHWA and INDOT recognize that facilitating effective tribal consultation may require providing travel support for tribal officials. Future formal agreements may specify how this support may occur.

G. The FHWA and INDOT shall ensure that consultation with other consulting parties, including local governments, shall not include the dissemination, beyond those who have an official need to know, of

confidential information except as mandated by federal or state laws. Confidential information is defined as information pertaining to Native American<sup>6</sup> sites, that, if disclosed may:

1. cause a significant invasion of privacy; risk harm to historic properties; or impede the use of a traditional religious site by practitioners (54 U.S.C. § 307103 et seq.);
2. risk harm to TCPs, traditional cultural landscapes, and traditional natural resources;
3. risk harm to archaeological sites that may contain burials or human remains, funerary objects, sacred objects and/or objects of cultural patrimony; or
4. risk harm to Native American historic properties in accordance with Section 304 of the NHPA.

H. As Native American archaeological sites, TCPs, traditional cultural landscapes, traditional natural resources, burial sites, funerary objects, sacred objects, and/or objects of cultural patrimony are non-renewable resources, FHWA and INDOT shall make a reasonable and good faith effort to inform the public and private landowners regarding stewardship, site protection and preservation which may include but not be limited to tax incentives or related benefits, lectures, exhibits, site-specific consultation, brochures, and videos.

I. A Tribe may request to enter the process at any time.

J. Tribes will be contacted if Native American human remains, burials, or burial objects are found during archaeological investigations or during construction. In any instance where Native American human remains are uncovered, Tribes will be notified in accordance with III.C. of this MOU.

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<sup>6</sup> Throughout this MOU, the term Native American can refer to pre-Columbian peoples and post-Columbian American Indians.

## II. NOTIFICATION FOR CONSULTATION PROCEDURES

A. *Points of Contact*: The FHWA, INDOT, SHPO, and Tribes shall each designate primary and secondary contacts<sup>7</sup>. The primary contact for Tribes is the contact to whom all initial and formal correspondence goes, including notification and updates of public involvement for the Indiana Statewide Transportation Improvement Plan (STIP) and project specific Section 106 correspondence and documentation. If the individual designated as the primary point of contact is not available, communications shall be directed to the secondary contact. The primary and secondary contacts within each Tribe are responsible for involving the appropriate tribal individuals. Each party of this MOU shall provide in writing (hardcopy or email) the other parties with the phone numbers, email addresses, and mailing addresses for the primary and secondary contacts. Each party shall notify the other parties in writing (hardcopy or email) when either point of contact changes. On an annual basis, FHWA/INDOT will send an email request to the Tribes asking for new or updated contact information and update the contact list accordingly. Such changes shall not require the amendment of this agreement.

B. *Tribal Areas of Concern*: The Tribes have provided, or will provide, FHWA/INDOT with a listing of all Indiana counties that exist within their ancestral homeland and territory, in which they have an interest (see Appendix A). At the Tribes' discretion, a Tribe or Tribes may also be identified to review projects in other areas of Indiana. The FHWA/INDOT will maintain this list and will update as necessary when additional tribal interests are made known. If Tribes do not provide FHWA/INDOT with their counties of interest, FHWA/INDOT will utilize the table entitled *Indiana-Present Day Tribes Associated with Indiana Land Cessions 1784-1894* available from National NAGPRA Online Databases in its tribal consultation.

C. *Delegation of Certain Responsibilities to INDOT*: INDOT will provide Indiana STIP annual updates to Tribes and notify Tribes of public meetings and comment periods on the STIP. INDOT will conduct Early Coordination with the Tribes for applicable projects (see Stipulation II.F.), soliciting the Tribes' input as early as possible in the project's development, and providing them detailed project information as necessary or requested.

INDOT will maintain cultural resource staff, or utilize consultants, who, at a minimum, meet the federal qualifications set forth in the Secretary of the Interior's Professional Qualification Standards (36 C.F.R. Part 61) and State of Indiana standards (IC 14-21-1 and 312 IAC 21) for cultural resource studies. INDOT may also carry out consultation activities in accordance with Stipulation I.D., but FHWA will be involved in or monitor all such consultations and will at all times be available for direct communication with any party. The FHWA will be a signatory on all project-specific or other formal agreement documents.

D. *Indiana Program Documents*: The Indiana Statewide Transportation Improvement Program (STIP) is a four-year planning document that lists all projects expected to be funded in those four years with Federal funds and those state-funded projects that have been deemed as Regionally Significant. The list of projects included in the STIP is maintained on the INDOT website <http://www.in.gov/indot/2348.htm> .

E. *Programmatic Agreement and Projects Exempt from Section 106 Early Coordination*: FHWA and INDOT periodically execute programmatic agreements (PA) with the SHPO and the Advisory Council on Historic Preservation (ACHP) that determines how Section 106 is satisfied by FHWA in Indiana. At the

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<sup>7</sup> see Appendix B: POINT OF CONTACT LIST.

time of execution of this MOU, the FHWA IN Division administers Section 106 following the *Programmatic Agreement Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana* dated September 6, 2006<sup>8</sup>. This PA includes categories of minor projects exempted from Section 106 early coordination and consultation. The project types exempted from Section 106 early coordination and consultation by the PA are generally limited to the repair, replacement or upgrade of existing transportation infrastructure. The PA can also be applied to three project types (B-8: Trails; B-9: Small Structure Replacements; and B-10: Slide Corrections) after an archaeological reconnaissance has identified no NRHP eligible archaeological sites within the project area. If a potentially eligible or eligible archaeological site is identified, the PA does not apply and Section 106 consultation is required. All archaeological reports prepared for review under the PA shall be provided to Tribes and SHPO.

FHWA and INDOT will consult with the Tribes in development of new programmatic agreements. As new programmatic agreements are executed, Appendix C will be updated with the most recent version without requiring amendment to this MOU.

No federal-aid projects are exempt from being listed in the Indiana STIP. Tribes will see a listing of *all* federal-aid projects in their counties of interest (see III.A). If a Tribe expresses concerns about a project listed in the STIP that qualifies for Section 106 clearance under the PA, FHWA and INDOT will consult further with the Tribe. Based on this consultation, FHWA and INDOT may determine that the PA is not applicable due to tribal concerns and Section 106 consultation will be required as outlined in III.A-C.

*F. Transportation Projects to be Considered for Early Coordination:* INDOT will initiate Early Coordination with Tribes and SHPO on projects that have the potential to affect cultural resources that may be of interest to Tribes. Early Coordination will be initiated for:

1. Any INDOT project that is considered to be a Federal undertaking that is subject to Section 106 as described in 36 C.F.R. Parts 800.3(a) and 800.16(y) and is not exempt from Section 106 early coordination and consultation through application of the PA. The FHWA/INDOT will coordinate with Tribes who claim association with that project's county (see II.B); and
2. The FHWA/INDOT will consult with Tribes regarding any properties in which they have an expressed interest as a result of their review of project documentation provided by INDOT.

*G. Early Coordination:* Early Coordination provides the SHPO, Tribes, and other consulting parties the opportunity to request participation in the Section 106 process and to comment on a project's anticipated impacts early in project development. Early Coordination may be conducted via an email generated from INDOT's Section 106 electronic consultation portal, an email sent by FHWA/INDOT, or hard copy correspondence sent by FHWA/INDOT, if requested. Minimally, Early Coordination will include a project description, topographical map indicating township, section and range, a request for the recipient to indicate their interest for consulting on the project, and request for any concerns/feedback. When Section

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<sup>8</sup> See Appendix C: 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.

106 consultation is initiated and before a final transportation alternative is approved, tribal early coordination shall be sent to ensure tribal views are considered into the decision making process. Tribes will have 30 days from receipt of the early coordination letter to provide comments and/or concerns.

H. *Quality Assurance Reviews*: On an annual basis, FHWA and INDOT will conduct Quality Assurance Reviews (QARs) of post-construction transportation projects in three (of six) INDOT Districts. QARs consist of reviewing projects exempted from Section 106 early coordination and consultation through the PA to confirm that the PA was applied correctly based on the scope of work. QARs will also include on-site visits to project locations to verify that the project scope and construction were completed as explained in the PA or Section 106 documentation as appropriate and to ensure that any commitments regarding cultural resources were followed. Should a QAR involve a project in which Tribes expressed an interest during Section 106 consultation, Tribes will be notified two weeks prior to the QAR and invited to attend the site visit. In addition, if Tribes have specific projects of concern, they can request that those projects be included in future QARs at any time. If serious problems regarding tribal commitments not being followed are identified during a QAR, Tribes will be notified immediately. QAR annual reports will be provided to INDOT, FHWA, SHPO, and Tribes.

### III. CONSULTATION PROCEDURES

A. *Indiana Program Documents*: On an annual basis, INDOT will email tribal contacts the STIP website address for review. INDOT will also notify tribal contacts by email when INDOT offers public comment periods or public meetings in development of a new STIP document. This information will give the Tribes the opportunity to review and comment on *all* projects in their counties of interest in advance of project development.

If a Tribe expresses interest in any project(s) listed in the STIP, detailed project information will be sent to them and the procedures under Stipulation III. B. will be followed.

B. *Early Coordination*: In addition to the regular notification of all projects in the Indiana STIP, INDOT will initiate Section 106 early coordination and consultation early in project development when Section 106 consultation is initiated and before a final transportation alternative is approved, for undertakings that are not categories of minor projects exempted from Section 106 early coordination and consultation (Appendix C). These are projects that INDOT has determined may have potential to affect historic properties.

Tribes, FHWA, SHPO, and INDOT mutually agree on the following consultation procedures for identifying and evaluating the effects of projects on cultural resources. These procedures shall comply with all applicable federal and state laws, statutes, and regulations. To the extent any provision conflicts with or is less protective of Tribal interests than applicable federal law or regulation, the federal law or regulation shall take precedent.

1. Early coordination letters and any follow up correspondence will be written on either INDOT or FHWA letterhead and signed by a representative of sending agency; informal correspondence between agencies and Tribes may be by email. INDOT will use Appendices A and B to identify and invite Tribes into Section 106 consultation for a project under study in their area of concern. The early coordination letter (ECL) will provide a project description along with a 7.5 minute quadrangle map showing the proposed project location, providing township, section, and range. The Tribe will notify INDOT if there is a Native American archaeological site, TCP, traditional cultural landscape, or traditional natural resource within the

project area, or if they have an interest in the undertaking. If INDOT does not receive a response from the Tribe by the date specified by INDOT (not fewer than 30 days) they may assume the Tribe has no interest in the undertaking.

2. Tribes that respond within the time allotted by INDOT (not fewer than 30 days) with an interest in the undertaking will be a consulting party for the project. Tribes may request additional project information, which INDOT will provide. The means of consultation will be negotiated on a project case-by-case basis as appropriate for each Tribe's interest and request. Tribes may re-enter into consultation at any point during the Section 106 process.

3. If there is any disagreement among the agencies and Tribes regarding the eligibility of an archaeological site, TCP, traditional cultural landscape or traditional natural resource all parties will have further discussions to attempt to reach agreement and will follow eligibility guidelines in National Park Service Bulletin 38.

If INDOT/FHWA and Tribes cannot reach agreement regarding the eligibility of an archaeological site, TCP, traditional cultural landscape or traditional natural resource after following the guidelines outlined in National Park Service Bulletin 38, the Tribe may, per the Section 106 regulations at 36 C.F.R. Part 800.4(e)(2), ask the ACHP to request that the federal agency obtain a formal eligibility determination from the Keeper of the National Register.

4. INDOT, in consultation with SHPO and Tribes, shall conduct appropriate archaeological investigations and prepare reports, which will be posted on INDOT's Section 106 electronic communication web portal. A notification that a report has been posted will be provided to the tribal contacts and SHPO. A hardcopy report will be provided to SHPO for as long as they require hard copy report submissions. Reports may also be sent by hardcopy to any consulting party Tribe that requests a hard-copy. The Tribes and SHPO will be provided a 30-day review period that will run concurrently.

Any response received from a consulting party Tribe during this period will be provided to SHPO for consideration in the identification of historic properties. If INDOT does not receive a response within the 30-day period from a consulting party Tribe, FHWA/INDOT may assume the Tribe has no comment regarding the outcome of the archaeological investigation.

5. For identified archaeological sites that FHWA and INDOT, in consultation with consulting party Tribes and SHPO, agree are not eligible for inclusion in the NRHP, no further archaeological investigations will be required. For projects where there are no historic properties present or none that will be affected, INDOT shall provide documentation of no historic properties affected as set forth in 36 C.F.R. Part 800.11(d) to the consulting party Tribes and SHPO.

6. For archaeological sites evaluated as eligible for listing on the NRHP, consultation will continue with the SHPO and consulting party Tribes to avoid, minimize or mitigate adverse effects to the eligible resource. When a historic property may be affected by the undertaking, FHWA/INDOT will apply the criteria of adverse effect as set forth in C.F.R. 36 Part 800.5(a)(1) and shall provide documentation as set forth in 36 C.F.R. Part 800.11(e) to the consulting party Tribes and the Indiana SHPO. If adverse effects cannot be avoided, then INDOT, FHWA, the Tribes, and SHPO will consult to develop a Memorandum of Agreement (MOA).

*C. Unanticipated Discoveries During Construction:* The following procedures will be used in the event that previously unreported and unanticipated artifacts or human remains (including funerary objects, sacred objects, and objects of cultural patrimony) are found during INDOT construction activities. The procedures differ depending on whether unanticipated artifacts (see Section C.1.) or human remains (including funerary objects, sacred objects, and objects of cultural patrimony) (see Section C.2.) are encountered. These procedures are intended to ensure that the project is in compliance with all applicable federal and state laws and regulations, including Section 106 of the NHPA of 1966 (54 U.S.C. § 300101 and 36 C.F.R. Part 800), the Indiana Historic Preservation Act (IC 14-21), Indiana Administrative Code 312 IAC 22, and INDOT Standard Specification 107.10.

1. *Procedures for an Unanticipated Discovery of artifacts:* In the event of unanticipated discovery of artifacts during INDOT construction activities, INDOT will follow these procedures:

- (a) The construction contractor (Contractor) shall immediately stop all construction activity within a 100 ft. radius of the discovery and cease further disturbance. If the Contractor is unaware of the size and scope of the discovery or if the discovery suggests the possible presence of other artifacts within the work site, the Contractor shall also immediately stop all construction activity beyond a 100 ft. radius of the discovery to the extent appropriate. The Contractor shall notify the INDOT Project Engineer (Engineer) who will inform INDOT CRO of the discovery. Within two business days from the time of discovery, INDOT CRO shall notify the Indiana Department of Natural Resources-Division of Historic Preservation and Archaeology (DHPA) and Tribes.

Within 48 hours of notification of the discovery, INDOT CRO shall review a description and photographs of the discovery provided by the Contractor or Engineer and determine whether construction may resume or if a site visit is warranted to document and evaluate the discovery. Consultation with Tribes and DHPA will be initiated to help determine the value of items found and assist in determinations of eligibility. If a site visit is warranted, INDOT CRO will have two business days following the site visit and Tribal input to determine the NRHP eligibility of the discovery. Tribes shall be invited to attend site visits to assist in eligibility determinations.

- (b) If the discovery is not eligible for listing on the NRHP, INDOT CRO will report the site to DHPA and inform the Engineer that construction in the area of the discovery may resume. If there is disagreement among the agencies and Tribes regarding the eligibility of a discovery for listing, all parties shall further consult to attempt to reach an agreement. If an agreement cannot be reached after following the guidelines outlined in National Park Service Bulletin 38, the Tribe may, per the Section 106 regulations at 36 C.F.R. Part 800.4(c)(2), ask the ACHP to request that the federal agency obtain a formal eligibility determination from the Keeper of the National Register.
- (c) If the discovery is determined, through consultation, to be eligible for listing on the NRHP, INDOT CRO will consult with Tribes, previously identified consulting parties, FHWA, SHPO and the ACHP regarding INDOT CRO's proposed actions to resolve the adverse effects, if adverse effects cannot be avoided. Tribes and other consulting parties will have two business days to provide their views on the proposed actions. INDOT/FHWA will ensure that the recommendations of Tribes and other consulting parties are taken into account prior to granting approval of the measures that will be implemented to resolve adverse effects. These measures may include:

- preparation of a mitigation plan by INDOT CRO in consultation with the Tribes for approval by the DHPA;
- implementation of the mitigation plan;
- archaeological mitigation of the site (data recovery);
- DHPA approval to resume construction following completion of the fieldwork component of the mitigation plan;
- photographic documentation and/or scaled mapping of the resource;
- visits to the site by Tribes and DHPA.

(d) Dispute Resolution: The FHWA will seek and take into account the recommendations of the ACHP in resolving any disagreements that may arise regarding determination of effects.

*2. Procedures for an Unanticipated Discovery of Human Remains and Burials (including funerary objects, sacred objects, and objects of cultural patrimony):* In the event of an unanticipated discovery of human remains or burials (including funerary objects, sacred objects, and objects of cultural patrimony as defined by 43 C.F.R. § 10.2(d)) during INDOT construction activities or FHWA/INDOT archaeological investigations, INDOT will comply with the Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. § 3001 et seq.), the Indiana Historic Preservation Act (IC 14-21), 312 IAC 22 and INDOT Standard Specification 107.10, and any other applicable federal and state laws, and will follow these procedures:

(a) Upon encountering human remains or an unmarked human burial (including funerary objects, sacred objects, and objects of cultural patrimony) during ground disturbing construction activities or archaeological investigations, INDOT, its consultant, or the Contractor shall immediately cease work within a 100 ft. radius of the discovery and inform local or state police and the county coroner. If the discovering party is unaware of the size and scope of the discovery or if the discovery suggests the possible presence of other human remains or an unmarked human burial within the work site, the party shall also immediately stop all construction activity beyond a 100 ft. radius of the discovery to the extent appropriate. If uncovered during construction, the Contractor shall notify the Engineer who will inform INDOT CRO of the discovery; INDOT CRO will then notify DHPA/SHPO and Tribes within two business days of the time of the discovery. If identified during archaeological work, INDOT will notify SHPO and Tribes within two business days of the time of discovery. In addition to ceasing work, the discovering party must make a reasonable effort to protect the human remains, funerary objects, sacred objects, or objects of cultural patrimony discovered inadvertently.

(b) In coordination with DHPA/SHPO and Tribes, INDOT CRO will determine if the skeletal remains are human, the degree to which they were disturbed, and if possible, assess their potential age and cultural affiliation without any further disturbance. If the skeletal remains are human and are Native American in origin, CRO will notify by email the point of contact(s) for each Tribe claiming interest in the county of the discovery. If discoveries are not of human remains, the INDOT CRO shall further consult with Tribes to determine if such discoveries are funerary objects, sacred objects, or objects of cultural patrimony.

(c) If it is determined by INDOT CRO, in consultation with DHPA/SHPO, FHWA, and Tribes, that intact or fragmented human remains are present and are Native American in origin, or that the discovered materials are funerary objects, sacred objects, and objects of cultural patrimony, INDOT

CRO will consult with Tribes, DHPA/SHPO, and FHWA regarding measures to avoid and protect the discovery or mitigate any adverse effect of the project on the discovery. These measures may include:

- INDOT CRO collaborating with design team to alter project plans to avoid human remains and/or burials (including funerary objects, sacred objects, and objects of cultural patrimony);
- avoiding the human remains and/or burial (including funerary objects, sacred objects, and objects of cultural patrimony) and preserving in place;
- if avoidance is not feasible, in consultation with Tribes, recovering the human remains and/or burial (including funerary objects, sacred objects, and objects of cultural patrimony) through standard archaeological methods;
- preparation of a mitigation plan by INDOT CRO in consultation with the Tribes for approval by the DHPA;
- implementation of the mitigation plan;
- archaeological mitigation of the site (data recovery);
- visits to the site by Tribes and DHPA;
- DHPA approval to resume construction following completion of the fieldwork component of the mitigation plan;
- consultation with Tribes, FHWA, and DHPA/SHPO regarding disinterment and reinterment of Native American human remains. FHWA and DHPA/SHPO will defer to tribal recommendations regarding cultural affiliations, disinterment, and reburial of Native American human remains and/or burials (including funerary objects, sacred objects, and objects of cultural patrimony).

#### **IV. OTHER POINTS OF MUTUAL AGREEMENT**

*A. Execution and Implementation:* This MOU is effective as of the date of the last signature among FHWA, SHPO, INDOT, and at least one Tribe with an interest in Indiana lands. Other Tribes may become signatory to this MOU after that date, without the need to amend this MOU. The successful implementation of this process shall constitute meaningful consultation between FHWA and the Signatory Tribes to fulfill tribal consultation requirements of Section 106 of the NHPA.

*B. Annual Report and Evaluation of MOU Implementation:* On an annual basis, INDOT will submit a report to FHWA, SHPO, and Tribes identifying projects processed under this MOU. The report shall include a description of actions taken to comply with this MOU. The report should provide a description and summary of exempted projects listed in Appendix C for which INDOT did not conduct Section 106 early coordination and consultation. At the same time, FHWA and INDOT will offer the opportunity for a meeting (in-person, teleconference or web-conference) with signatories to discuss issues defined in this MOU. The purpose of the annual meeting is to continue effective working relationships and evaluate the implementation of this agreement.

*C. Confidentiality:* The FHWA and INDOT acknowledge the need for confidentiality of certain tribal religious and cultural information that may be provided by Tribes during the course of consultations, and other aspects of tribal consultation conducted on cultural resource issues. Information identified as sensitive by consulted tribal members, and requested to remain confidential, will remain confidential to the extent permitted by state and federal law (54 U.S.C. § 307103 et seq. and Section 304 of NHPA).

D. *Dispute Resolution*: Should any signatory object at a later date to the implementation of this agreement in whole or in part, the objecting party will consult with all signatories to resolve the objection. If all signatories are unable to satisfactorily resolve the issue, and the issue involves resolution of the Adverse Effect of an INDOT project on a site eligible for inclusion on the NRHP, the administrative process defined in 36 C.F.R. Part 800.6 will be followed.

E. *Failure to Comply/Termination*: If any signatory determines that the terms of this MOU cannot be or are not being carried out, then the signatories shall consult regarding the reasons, and will seek amendment to the MOU, if appropriate. If the MOU is not amended, any signatory may terminate their participation in the MOU by providing 30 calendar days written notice to the other parties. In the event of termination by a Tribe, the FHWA and INDOT shall comply with 36 C.F.R. Part 800 and continue with individual tribal consultation with that Tribe. As long as the FHWA, INDOT, SHPO, and at least one Tribe continues to participate, the MOU will remain in effect, but the Tribes who have terminated their participation will no longer be held to the terms of this agreement.

F. *Amendment*: Any signatory to this MOU may request that it be amended, whereupon all signatories shall consult to consider such an amendment. Any resulting amendments shall be developed and executed among the signatories in the same manner as the original MOU. Any amendment to this MOU will go into effect only upon written agreement of all signatories.

G. *Participation in Similar Activities*: This MOU in no way restricts the FHWA, INDOT, or the signatory Tribes from participating in similar activities with other public or private agencies, organizations, and individuals.

H. *Commencement/Termination Date*: This MOU is executed as of the date of last signature between FHWA, INDOT, SHPO, the ACHP, and at least one Tribe. Other Tribes may become signatory to this agreement after that date. This MOU is effective through December 31, 2030, at which time it will expire unless specifically extended by signatory resolution. One year prior to expiration, the signatories will discuss whether this agreement should be renewed, modified, or allowed to expire.

**SIGNATORIES:**

FEDERAL HIGHWAY ADMINISTRATION

By: Mayela Sosa  
Mayela Sosa  
Division Administrator

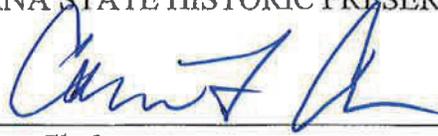
Date: 14 Feb 2017

INDIANA DEPARTMENT OF TRANSPORTATION

By:   
\_\_\_\_\_  
Joseph McGuinness  
Commissioner

Date: 2/3/2017

INDIANA STATE HISTORIC PRESERVATION OFFICER

By: 

Cameron Clark,  
Director, Indiana Department of Natural Resources

Date: 3-6-17

Insert individual Tribe(s) pages here:

MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM

Name of Tribe: RED CLIFF BAND OF LAKE SUPERIOR CHIPPWAS

Signature: Lawrence Balber

Date: 4/4/2017

Please Print Name: LAWRENCE BALBER

Title: TRIBAL HISTORIC PRESERVATIONS  
OFFICER

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Delaware Nation

Signature: 

Date: 5/16/2017

Please Print Name: Kerry Holton

Title: 5/16/2017

MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM

Name of Tribe: Niami Tribe of Oklahoma

Signature: Douglas Lansford Date: 3-16-17

Please Print Name: Douglas Lansford Title: Chief

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Seneca-Cayuga Nation

Signature: William L. Fisher Date: 3-13-2017

Please Print Name: William L. Fisher Title: Chief

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Delaware Nation

Signature: 

Date: 4/4/2017

Please Print Name: # Kerry Holton

Title: 4/4/2017

MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM

Name of Tribe: DELAWARE TRIBE OF INDIANS

Signature: Chester L. Brooks Date: 3-6-2017

Please Print Name: CHESTER L. BROOKS Title: CHIEF

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Eastern Shawnee Tribe of Oklahoma

Signature: Glenna J Wallace

Date: 3-1-2017

Please Print Name: GLENN J WALLACE

Title: Chief

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: F. C. P.

Signature: alw. milham

Date: 3/20/2017

Please Print Name: AL W. MILHAM

Title: Vice Chairman

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Leech Lake Band of Ojibwe

Signature:  Date: 3-16-17

Please Print Name: Faron Jackson Sr. Title: chairman

**LEECH LAKE BAND OF OJIBWE**



**Maggi Jordan**  
Executive Assistant  
Tribal Chairman

Maggi.Jordan@llojibwe.org  
Fax: (218) 335-7225  
190 Sailstar Drive NW  
Cass Lake, MN 56633

**Office: (218) 335-4404 Cell: (218) 513-5623**

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Pokagon Band of Potawatomi Indian

Signature: Jason M. Wesaw Date: 3-31-17

Please Print Name: Jason M. Wesaw Title: Government Manager

**MEMORANDUM OF UNDERSTANDING  
AMONG  
THE FEDERAL HIGHWAY ADMINISTRATION,  
INDIANA STATE HISTORIC PRESERVATION OFFICER,  
INDIANA DEPARTMENT OF TRANSPORTATION,  
and  
FEDERALLY RECOGNIZED TRIBES INTERESTED IN INDIANA LANDS  
REGARDING TRIBAL CONSULTATION REQUIREMENTS  
FOR THE INDIANA FEDERAL TRANSPORTATION PROGRAM**

Name of Tribe: Turtle Mountain Band of Chippewa Indians

Signature: Wayne Keplin Date: 3/5/17

Please Print Name: Wayne Keplin Title: Tribal Chairman



June 17, 2020

Ms. Kia Gillette  
Environmental Project Manager  
HNTB Corporation  
111 Monument Circle, Suite 1200  
Indianapolis, IN 46204  
[kgillette@hntb.com](mailto:kgillette@hntb.com)

**Re: Section 106 “Optional Concurring Party” Invitation**

Dear Kia:

The Rethink 65/70 Coalition has decided to decline the invitation to be a Concurring Party Signatory to the Section 106 MOA for the North Split project. We have arrived at this decision based on several concerns regarding the Section 106 process, its outcomes, and our belief that INDOT has not offered enough substantive solutions to the original impact on downtown historic neighborhoods affected by interstate construction. The Section 106 process, by definition, does not constrain innovative approaches to long standing issues.

While the Rethink 65/70 Coalition and its supporters have worked closely with INDOT to minimize and mitigate the interstate rebuild in the North Split project area by not adding interstate travel lanes, advocating for bridge and underpass designs that accommodate sidewalks, lighting, and decorative elements, enhanced landscape treatments within the right-of-way, and maintaining and enhancing bike/ped connectivity through the area, we believe an overall adverse impact on historic properties and neighborhoods remains.

In addition, we are disappointed there are no plans to make pedestrian safety and connectivity improvements between the Martindale Brightwood and Windsor Park neighborhoods to each other and the Monon, Cultural and Pogue’s Run trails, and create safe sidewalks and lighting to the Commerce Avenue underpass. As a matter of restorative environmental and social justice, we feel these inequities must be addressed as well.

The Rethink Coalition also does not agree with the “Invited Signatories” list. The City of Indianapolis should be an Invited Signatory and not just an “Optional Concurring Party”. The City has assumed obligations under the MOA and its approval should be required if the MOA is amended during the final design/build process. The Rethink 65/70 Coalition believes the City should have that opportunity and obligation.

We appreciate INDOT’s efforts during the Section 106 and CSS process and the opportunities to discuss our concerns about the North Split design. We would be happy to discuss our decision not to be a Concurring Party Signatory to the Section 106 process for the North Split project in more detail if it should be desired. Our goals continue to be to utilize best practices from around the country as cities like ours deal with aging, elevated highways, and to seek ways to knit communities back together.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul J. Knapp".

Paul J. Knapp  
Member, Rethink Coalition Leadership Team  
CEO, Young & Laramore Advertising

Cc:

Runfa Shi, INDOT  
Mayor Hogsett, City of Indianapolis  
Vop Osili, City-County Council President  
Zach Adamson, City-County Councilor  
Jeff Bennett, City of Indianapolis  
Mark Fisher, Indianapolis Chamber of Commerce  
Dan Parker, City DPW  
Emily Mack, City DMD  
Anna Gremling, Indianapolis MPO  
Robert Dirks, FHWA  
Roy Nunnally, FHWA  
Congressman Andre Carson  
Commissioner Joseph McGuinness  
Megan Sims Wells, Andre Carson's Office  
Governor Eric Holcomb  
Meg Purnsley, IHPC  
State Senator Breux  
State Representative Greg Porter

**From:** [Windsor Park](#)  
**To:** [Kia Gillette](#)  
**Cc:** [williehawkins89@gmail.com](mailto:williehawkins89@gmail.com); [Spades Park](#); [Zach Adamson](#); [Wells, James L.](#)  
**Subject:** Windsor Park Neighborhood Association, Inc. response to INDOT MOU Des No. 1592385 and 1600808, North Split Interchange reconstruction  
**Date:** Tuesday, June 30, 2020 6:36:41 PM

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June 30th, 2020

Kia Gillette-

Windsor Park Neighborhood Association, Inc. cannot sign the MOU as a concurring party because the plan does not satisfy concerns raised during the CSS process and the solutions designed are not equitable.

For most of the underpasses, there are planned upgrades that will improve pedestrian and bike access, lighting and landscaping. Unfortunately, the Roosevelt Ave/Commerce Avenue underpass, while originally under discussion to receive the same treatment, was left out of the final plan. **This means that the neighborhoods that have the worst connectivity to each other and that also happen to have a higher percentage of neighbors who do not own a car, will be excluded from the basic pedestrian and bicycling upgrades planned for the North Split area.**

Windsor Park neighbors find this problematic. We view INDOT's decision regarding this underpass as a continuation of the legacy of the original North Split construction in the 1960s- it's impact on poorer neighborhoods and people of color- and a lack of parity. **We see a need for restorative justice.** This is needed on both sides of I-70 but especially for our friends in Martindale Brightwood.

Impacts on our neighborhoods should have been considered more carefully as a part of INDOT's review.  
([https://secure.in.gov/indot/files/ES\\_EnvironmentalJusticeGuidance\\_2012.pdf](https://secure.in.gov/indot/files/ES_EnvironmentalJusticeGuidance_2012.pdf))

**You have already received a copy of the letter the Commerce Ave. Stakeholders have sent to Mayor Hogsett and City Councillors and may also view our joint letter [here](#).**

The letter explains why we think this is needed, our goals, map, photos and demographic data.

Furthermore, we are not assured that sound levels in our community will not increase. Previously, you explained that, while our neighborhood would have an imperceptible increase in noise, it would be mitigated by the new overpass- which was planned to be quieter due to no expansion joints and sound reducing pavement.

We are also concerned that, while verbal assurances have been made regarding the landscaping, hardscaping and artwork under the 10th Street underpass (Payne Connection), details to protect these investments have not been placed in the MOU.

We hope that INDOT will reconsider it's plan and final MOU to include:

Reduce Roosevelt/Commerce Avenue to 3 lanes between 16th Street and Brookside Parkway to slow traffic and make room for wider sidewalks and safer bicycling

- Cut back the underpass slope to allow more light and an improved sense of spaciousness for pedestrians
- Construct a Commerce Avenue Connector Trail parallel and adjacent to the interstate linking to the Monon, Cultural, and Pogue's Run Trails that restores neighborhood and downtown connectivity
- Replace and upgrade intersection and signals appropriate to safe pedestrian and bicycle crossings (given the heavy truck traffic)
- Fill in the missing sidewalk links for safe connectivity since this is the only connecting north- south passage between Rural Street and College Avenue
- Create a neighborhood gateway for Martindale Brightwood and a portal between the neighboring Near East neighborhoods
- Share the revised sound assessment for the neighborhoods around the Commerce Ave. bridge, now that the bridge will not be replaced
- Add protections, replacement assurances for the Payne Connection hardscape, landscape and art (excluding the murals).

Please enter our comments in the record.

Best,  
Jen Eamon, Pres.  
Windsor Park Neighborhood Association, Inc.



FONSI REQUEST

ATTACHMENT D: PROJECT COMMITMENTS



**I-65/I-70 North Split Interchange Project (Des. Nos.1592385 and 1600808 (Lead))**

**Project Commitments**

**Firm:**

1. If the scope of work or permanent or temporary right-of-way amounts change, the INDOT Environmental Services Division (ESD) and the INDOT District Environmental Section will be contacted immediately. (INDOT ESD)
2. It is the responsibility of the project sponsor to notify school corporations and emergency services at least two weeks prior to any construction that would block or limit access. (INDOT ESD)
3. Any work in a wetland area within right-of-way or in borrow/waste areas is prohibited unless specifically allowed in the U.S. Army Corps of Engineers permit. (INDOT ESD)
4. Wetlands M and N shall be avoided by all project activities. Wetlands M and N shall be marked as "Do Not Disturb" on the project plans. Construction fencing shall be installed and maintained around the boundaries of Wetlands M and N prior to construction. (INDOT ESD)
5. To minimize impacts to the state endangered Kirtland's snake, a silt fence shall be installed and maintained around any construction areas where ground disturbance will occur. (IDNR DFW)
6. An Indiana Tall Structure permit and FAA permit will be required for the project. James Kinder, Program Manager at the INDOT Office Aviation, shall be cc'd on all coordination with the FAA. (INDOT Aviation)
7. If a metal cast iron casing sitting horizontally in the ground or metal cast iron pipes are observed during construction, IDNR Division of Oil and Gas shall be called within 24 hours. (DNR Division of Oil & Gas)
8. The Indianapolis Cultural Trail (except the Payne Connection) shall remain open during construction, and access will not be impacted. (INDOT ESD)
9. A 90-foot section of Pogue's Run Trail east of the Monon Trail along 10<sup>th</sup> Street shall not be closed more than three months during construction. The closure duration shall be temporary, i.e., less than the time needed for construction of the project, and there shall be no change in ownership of the land. (INDOT ESD)
10. The Pogue's Run Trail shall be fully restored, i.e., the property shall be returned to a condition which is at least as good as that which existed prior to the project. (INDOT ESD)
11. A detour of the Monon Trail will be constructed. The detour will follow the Old Northside Trail for approximately 870 feet, then it will require construction of a trail that will continue west/southwest for approximately 600 feet within the interchange right-of-way and join College Avenue. The trail will continue south along the east side of College Avenue. Approximately 200 feet north of the intersection of College Avenue and 11<sup>th</sup> Street, a temporary multiuse path will be constructed within INDOT right-of-way east of College Avenue to connect to 10<sup>th</sup> Street. The entire detour route will be constructed within existing INDOT or City right-of-way, shall be 12-feet wide, and will be compliant with the ADA. Either the Monon Trail or the constructed detour must be open to trail users at all times. (INDOT ESD)
12. The portions of the trail from the Monon Trail to College Avenue and south along College Avenue shall remain a permanent feature, pending a maintenance agreement from the City. (INDOT ESD)
13. Trail nodes shall be constructed at the intersection of the Monon Trail and the detour trail, where the detour makes a 90-degree turn at College Avenue, and where the trail turns southeast from College Avenue. The trail nodes shall be constructed in accordance with the Indy Greenways Design Standards. (INDOT ESD)
14. Construction work within the Frank and Judy O'Bannon Old Northside Soccer Park is limited to the reconstruction of the Old Northside Trail for the Monon Trail detour and permanent trail. No other construction or staging activities will occur in the Park. (INDOT ESD)



15. If closure of both the Monon Trail and the prescribed pedestrian/bicyclist detour are required, the design-build team shall provide a short-term temporary detour for bicyclists and pedestrians of no more than three consecutive days. A short-term detour can only be used two times per year and must have written approval from INDOT and the City of Indianapolis. (INDOT ESD)
16. The public art sculptures, lanterns, and signs that are currently located along the Payne Connection shall be removed and stored during construction. The public art sculptures, lanterns, and signs shall be reinstalled once the interstate bridges have been constructed. Coordination with the Near East Area Renewal (NEAR) shall occur prior to re-installation of these features to determination their locations within the Payne Connection. (INDOT)
17. The project elements shall be designed in accordance with the North Split Aesthetic Design Guidelines. (INDOT)
18. Reconstructed bridges over local streets shall be built with a span equal to or greater than the existing span. Minimum local street requirements are listed in Table 1. (INDOT)

**Table 1. Minimum Local Street Requirements**

Local Street	Buffer Width	Sidewalk/Bike Path	Wall/Pier Offset
Washington Street	3 feet	12 feet	2 feet
Market Street	3 feet	10 feet	2 feet
New York Street	3 feet	10 feet	2 feet.
Vermont Street	3 feet	10 feet	2 feet
Michigan Street	3 feet	12 feet	2 feet
St. Clair Street	8 feet	10 feet	2 feet
10th Street	8 feet	12 feet	2 feet
Central Avenue	3 feet	12 feet	2 feet
College Avenue	8 feet	12 feet	2 feet

19. INDOT will develop and implement a Traffic Incident Management Plan in cooperation with law enforcement and emergency responders from throughout the region. (INDOT)
20. Eliminating the Meridian/Delaware Street entrance ramp to southbound I-65 and the C-D road will create a partial interchange, which is typically avoided by FHWA since some motorists are unable to reenter at the same location. To address these concerns, wayfinding signage will be provided to indicate alternative routes to enter I-65. (INDOT)
21. The concentration of naphthalene discovered at the surface sample from temporary monitoring well DB-1 was detected at a level above the IDEM RCG SLs that requires notification of presence, but does not appear to warrant further special handling, if localized. Verification of soil conditions in the vicinity of these locations shall be implemented during excavation activities. A competent person shall screen the soil while working in the area. Communication of the conditions, dust control, field screening, soil management, and sample collection may be required to protect workers and ensure proper handling, based on the competent person’s assessment while working in this area. (INDOT SAM)
22. Mercury and lead containing surface soil in the immediate vicinity of temporary monitoring well GP-19 was discovered in concentrations that exceed the IDEM RCG SLs. The concentrations identified were high enough that if the area is to be disturbed, then additional provisions, including soil sampling to delineate the extent of the elevated concentrations of mercury, will need to be implemented. The removal and disposal of the soil will need to be defined and sampled to characterize the nature and extent of the concentrations within the constraints of the roadway



- construction activities to be completed in that location. This data will be required to determine the requirements for proper handling and disposal of the soil. (INDOT SAM)
23. Concentrations of lead were identified at multiple locations that exceeded 100 mg/kg, which is not above the IDEM RCG SLs; however, it is above the RCRA Toxicity Characteristic Leaching Procedure (TCLP) 20X rule. These temporary well locations DB-1, DB-8, GP-12, GP-19, and GP-20 identified lead above the criteria stated above. If soil is to be disposed of from the vicinity of these locations, the soil will need to be containerized and sampled for waste disposal parameters (i.e. a minimum of TCLP lead and anything additional that may be required by the selected disposal facility). Based on the limited data collected, the lead concentrations do not appear to limit the excavation and reuse of the soil in these areas. Best practices such as dust control measures, etc., should be implemented to minimize the potential of exposure to surface lead concentrations during construction activities. (INDOT SAM)
  24. There was an elevated detection of cadmium in soil from temporary monitoring well DB-6 (78-80 feet-bgs). Based on the depth of this exceedance, it is unlikely to be unearthed and become a concern; however, if soil from this depth is encountered, the provisions (from commitment No. 24 above) should be implemented. (INDOT SAM)
  25. Several properties with environmental concerns were identified with elevated chlorinated solvent concentrations in groundwater in the RFI/IDEM VFC review. The residual concentrations, based on data reviewed on the IDEM VFC, are relatively low level, but groundwater in this area will require containerization and proper handling, if encountered. Therefore, provisions for the management of this material will need to be implemented if saturated soil or groundwater (dewatering) will be brought to the surface during construction activities in this area. BMPs shall be implemented for dewatering activities in this area. Communication of the conditions, containment of the liquids, controls to prevent runoff of extracted groundwater onto the surface, and sample collection at a minimum may be required to protect workers and ensure proper handling. (INDOT SAM)
  26. The limited scope of the subsurface investigation that was conducted for this project does not account for all potential exposure pathways to workers nor to all contaminants. When a concern or change in condition is observed during any activity, a stop work and assessment of the situation should be implemented to protect against exposure or mishandling of contaminated materials. (INDOT SAM)
  27. Personnel who may be exposed to hazardous substances are required to be Hazardous Waste Operations and Emergency Response (HAZWOPER 29 CFR 1920.120) trained; if they meet any of the following conditions: (1) Engaged in clean-up operations at an uncontrolled waste site (forced or voluntary), (2) Implementing corrective actions covered by RCRA, (3) Perform operations involving hazardous waste which are conducted at treatment, storage and disposal facilities, and (4) Emergency response operations for releases of, or substantial threats of release of, hazardous substances. (INDOT SAM)
  28. If groundwater monitoring wells are encountered in the project area, they will be maintained in place if feasible. If they cannot be maintained, the design-build team must contact the INDOT Project Manager who will notify the INDOT Right-of-way Permits Group. The INDOT Right-of-way Permits Group will notify the permit holder that the well must be removed prior to construction. The permit holder is responsible for coordination with IDEM and the INDOT Right-of-way Permits Group for replacement or relocation of the well. If a property owner cannot be found in connection with the monitoring well, then well abandonment will be included in the project contract. All well abandonment activities must be completed by an Indiana Licensed Well Driller in accordance with IAC 312-13-10. Regardless of whether the well is abandoned by the design-build team or the property owner, a record of well abandonment, including the well driller's license number, must be provided to the INDOT Project Manager once the well has been abandoned. (INDOT SAM)
  29. The portions of archaeology site 12-Ma-1062 that lie outside the proposed project area should be clearly marked so that they are avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the



- DHPA for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archaeology and Historic Preservation" (48 F.R. 44716). (INDOT CRO)
30. FHWA and INDOT shall ensure project elements, including tree and vegetation plantings, are designed in accordance with the North Split Project Aesthetic Design Guidelines. Minor modifications may be made if approved by FHWA and INDOT as long as they are within the spirit of the Aesthetic Design Guidelines. (INDOT CRO)
  31. FHWA and INDOT and/or its consultants shall provide a draft landscape and side slope plan (including scaled cross sections for each adjacent historic district) for consulting party review and comment at two points during the design process. (INDOT CRO)
    - a. Comment periods will be 30 days.
    - b. The first comment period will be for an initial review and comment.
    - c. The second comment period will be to show how comments were addressed, allow comments on revisions, and solicit input regarding any remaining questions.
    - d. FHWA and INDOT shall make a good faith effort to address comments and shall provide responses regarding how or why comments were addressed or not addressed.
    - e. FHWA and INDOT shall have one consulting party meeting within each comment period to provide information and solicit feedback from consulting parties.
    - f. FHWA and INDOT shall have at least one neighborhood meeting within each comment period to solicit feedback from adversely affected historic districts. Residents of the Old Northside, Saint Joseph, and Chatham-Arch neighborhoods shall be the focus of the neighborhood meetings; however, the meetings will be open to the general public.
    - g. FHWA shall have the authority for final approval of actions regarding the implementation of aesthetic and landscaping measures.
  32. Berms shall be included in the interchange design to provide visual shielding and noise reduction from the interchange ramps for the Old Northside and Chatham-Arch Historic Districts. (INDOT CRO)
    - a. The berms shall be located in the northwest quadrant of the interchange, extending from approximately 14<sup>th</sup> Street to College Avenue, and in the southwest quadrant of the interchange, extending from College Avenue to 10<sup>th</sup> Street.
    - b. The berms shall be sculpted into a softer, more natural shape and planted with trees such that they do not appear as abandoned "roadbeds". The proposed shape of the berms shall be included in the draft landscape and side slope plan provided to consulting parties for comment.
    - c. All other remnants of previous "roadbed" use shall be removed from areas that will no longer serve such a use, including those adjacent to the O'Bannon Soccer Park.
  33. INDOT shall develop a landscape maintenance plan for three years after tree and shrub planting. (INDOT CRO)
  34. INDOT shall engage Keep Indianapolis Beautiful, Inc. as a landscape advisor to provide recommendations and/or services for tree and shrub planting, monitoring, and maintenance for three years after planting. (INDOT CRO)
  35. INDOT shall replace trees and shrubs that do not survive during the first three years after planting. INDOT shall monitor planted trees and shrubs annually for three years. If dead trees or shrubs are identified during each annual monitoring, they will be replaced. If the replacement plant dies, it shall be replaced with a substitute species approved by INDOT. (INDOT CRO)
  36. INDOT shall identify "Do Not Disturb" areas within the project limits in order to preserve existing trees. The "Do Not Disturb" areas shall be marked with silt fence and signage. The only work that can occur in "Do Not Disturb" areas is the installation new drainage connections (to existing pipes). No clearing of trees 2-inch diameter at breast height (dbh) or greater shall be allowed in the "Do Not Disturb" areas. The "Do Not Disturb" areas shall be at the following locations: (INDOT CRO)



- a. Within the existing right-of-way of northbound I-65 adjacent to the Old Northside Historic District and Morris Butler House from College Avenue to Alabama Street. INDOT shall identify a work zone, where construction can occur, which extends 15 feet north of the proposed retaining wall within this area. Vegetation within the existing right-of-way north of that shall be in the “Do Not Disturb” area.
  - b. Portions of the existing right-of-way of southbound I-65 where groups of mature trees are present, adjacent to the Saint Joseph Neighborhood and Chatham-Arch Historic Districts from College Avenue to Delaware Street.
  - c. Portions of the existing right-of-way of southbound I-65/westbound I-70 where trees have been planted, adjacent to the Lockerbie Square Historic District from Michigan Street to New York Street.
37. If trees within the “Do Not Disturb” areas do not survive within one year of the conclusion of construction activity within fifteen feet of the area, INDOT shall plant replacement trees, at 2-inch dbh or greater in size, at a ratio of three to one (three replacement trees for each tree that does not survive). The replacement trees shall be planted in the “Do Not Disturb” areas if space allows or within INDOT right-of-way within the project area. (INDOT CRO)
38. Outside of the “Do Not Disturb” areas, INDOT shall plant shrubs and trees (if appropriate for the slope and location) at the following locations: (INDOT CRO)
- a. Within the 15-foot work zone north of I-65 northbound from College Avenue to Alabama Street.
  - b. The side slope of southbound I-65 between Alabama Street and College Avenue.
  - c. If the existing vegetation is removed during construction, along the western side slope of I-65/I-70 south of the interchange from 10<sup>th</sup> Street south to St. Clair Street.
39. INDOT shall plant trees 2-inch dbh or greater in size. This includes trees both in and out of the “Do Not Disturb” areas. (INDOT CRO)
40. FHWA and INDOT shall ensure project elements, including underpass treatments, are designed in accordance with the North Split Project Aesthetic Design Guidelines. Minor modifications may be made if approved by FHWA and INDOT as long as they are within the spirit of the Aesthetic Design Guidelines. (INDOT CRO)
41. FHWA shall have the authority for final approval of actions regarding the implementation of aesthetic and landscaping measures. (INDOT CRO)
42. To improve connectivity between adversely affected historic districts, INDOT shall make the following connectivity improvements: (INDOT CRO)
- a. Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Alabama Street underpass shall include new lighting on the bridge, sidewalk pavers, and signage along Alabama Street identifying each neighborhood. Coordination shall occur with the Old Northside and Saint Joseph neighborhoods regarding their established logos and sign standards.
  - b. Between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements to the Central Avenue underpass shall include a wider bridge opening (65 feet to at least 76 feet), wider sidewalks, sidewalk pavers, new lighting with upgraded fixtures on the bridge, vertical bridge walls, elimination of drainage from the bridge above on to the street and sidewalks, and space for murals.
  - c. Between the Old Northside and Chatham-Arch Historic Districts, improvements to the College Avenue underpass shall include wider bridge openings (79 feet to at least 87 feet), wider sidewalks, sidewalk pavers, new lighting with upgraded fixtures on the bridge, vertical bridge walls, elimination of drainage on to the street and sidewalks, and space for murals.
43. INDOT shall provide \$190,000 to the Benjamin Harrison Presidential Site towards the construction of the Old Northside Connector, a pedestrian and bicycle path to connect the alley south of the Benjamin Harrison Presidential Site to Pennsylvania Street. This stipulation will be



implemented through an agreement between INDOT and the Benjamin Harrison Presidential Site. (INDOT CRO)

44. INDOT shall construct a temporary detour for the Monon Trail during construction. The portion of the detour within the O'Bannon Soccer Park and within INDOT right-of-way west to College Avenue and under the College Avenue bridges will remain as a permanent feature to improve connectivity between the Old Northside and Chatham-Arch Historic Districts. (INDOT CRO)
45. INDOT shall construct a temporary detour for the Monon Trail during construction. INDOT shall work with the City of Indianapolis to determine if the portion of the detour southwest of the interchange from College Avenue southeast to 10<sup>th</sup> Street can remain as a permanent feature to improve connectivity for the Chatham-Arch Historic District. Retaining this trail as a permanent feature is conditional upon INDOT reaching an agreement with the City of Indianapolis. The final decision shall be communicated to consulting parties. (INDOT CRO)
46. INDOT shall install "No Construction Traffic" and "Local Traffic Only" signs at the entrance to the brick portion of 10<sup>th</sup> Street from Delaware Street to Central Avenue to protect the brick portion of 10<sup>th</sup> Street from construction traffic. (INDOT CRO)
47. INDOT and its design-build team shall avoid the limestone curbs and street trees along 12<sup>th</sup> Street, north of I-65 northbound, during all construction activities. If damage occurs to the limestone curbs as a result of the North Split Project construction, INDOT shall repair the limestone curbs. (INDOT CRO)
48. To avoid damage to historic properties, INDOT shall ensure that a Construction Vibration Monitoring and Control Plan ("Plan") is developed by the design-build team prior to beginning any construction activities. The Plan shall at least include all buildings within historic properties or districts within 140 feet of project construction activities. The Plan will include the following key elements: (INDOT CRO)
  - a. The Plan will include the following key elements:
    - i. Identifying buildings that are sensitive to vibration;
    - ii. Conducting pre-construction surveys of residences, historic buildings, and other vibration-sensitive structures in the project corridor to determine the appropriate vibration limits for the type of structure and conditions of the structure;
    - iii. Developing and implementing a vibration monitoring program for construction activities; ensuring that, whenever vibration levels exceed the maximum thresholds identified in Table 2 below, construction work causing that vibration will immediately stop until such time as qualified professionals have determined that modifications have been made in the construction activities to assure that no damage shall occur to historic properties;
    - iv. Conducting post-construction surveys;
    - v. Phasing construction activities that create vibration so that multiple sources of vibration do not occur at the same time;
    - vi. Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours;
    - vii. Developing a method for responding to community complaints; and
    - viii. Keeping the public informed of proposed construction schedules, and identifying activities known to be a source of vibration.
  - b. Maximum thresholds for historic properties that shall not be exceeded are shown in Table 2. The values are presented in terms of peak particle velocity (PPV), the accepted method for evaluating the potential for damage.
  - c. INDOT and/or its consultants shall provide the draft Plan to the North Split consulting parties for a 30-day review period. INDOT shall respond to consulting party comments.



- d. In the event vibration damage does occur as a result of the North Split Project construction activities (as evidenced by the pre- and post- construction surveys), INDOT shall ensure that the design-build team will be responsible for the cost and repair of any vibration damage to historic properties. Any repairs shall be coordinated with the Indiana SHPO to ensure they are carried out in accordance with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent on property owners allowing pre and post construction surveys of their buildings.
- e. Where access to privately owned property is necessary for monitoring or damage repair, consent shall be obtained prior to entry.

**Table 2. Construction Vibration Thresholds (PPV)**

Type of Structure	Ground-borne Vibration Impact Level (PPV)
New Residential Structures	1.0 in/sec
Non-historic Older Residential Structures	0.5 in/sec
Fragile (non-engineered timber and masonry buildings)	0.20 in/sec
Extremely Fragile (buildings, ruins, ancient monuments)	0.12 in/sec

- 49. Non-highway use features not essential for highway travel in the INDOT right-of-way shall be permitted and approved (23CFR1.23(c)). The final design of the aesthetics features in the North Split Project must be submitted for final approval and permitted per INDOT’s policy prior to construction. (INDOT)
- 50. The Construction Noise Abatement Plan will be sent to consulting parties for their information once it has been approved by INDOT. (INDOT)
- 51. INDOT will complete a Mobility Management Plan to manage traffic and reduce travel demand during construction of the North Split Project. (INDOT)
- 52. The stipulations of the Section 106 MOA shall be implemented as part of the North Split Project. (INDOT CRO)
- 53. Progress reports detailing implementation of the measures stipulated within this MOA and providing advanced notice of milestones, such as approval of design plans and initiation of construction activities, shall be submitted to signatories and concurring parties every six months, until all phases of the North Split Project are complete. The first progress report shall be distributed within six months following execution of this MOA. The progress reports shall identify the status of activities for each stipulation outlined in this MOA. (INDOT CRO)
- 54. A consulting party meeting will be held to inform consulting parties of the status of activities and evaluate compliance with the MOA within 30 days of distribution of each progress report. The consulting party meetings could be combined with those regarding review of the landscape and side slope plans. (INDOT CRO)
- 55. One round of four neighborhood meetings shall be held during the design process to show the results of the project design and CSS design elements. Neighborhoods invited during the CSS process will be invited to attend these meetings. (INDOT)
- 56. The brick portion of 10<sup>th</sup> Street from Central Avenue to Delaware Street shall not be used by construction vehicles or equipment, or signed for any local road detours by the Design-Build Team. (INDOT)



57. Between the Martindale-Brightwood and Windsor Park neighborhoods, improvements to the Commerce Avenue/Roosevelt Avenue underpass shall include new lighting on the bridge and new sidewalks. (INDOT)
58. If desired by the community, INDOT shall partner with Keep Indianapolis Beautiful to provide funding for a mural on the bridge columns at the Commerce Avenue/Roosevelt Avenue underpass. (INDOT)
59. INDOT will hold a meeting with the EJ Working Group prior to construction (after MOT plans are available from design-build team) to communicate MOT and construction impacts. Regular communications to the public will be provided while the construction work is underway. The project team will work with the EJ Working Group in developing a full and representative listing of contacts for these communications. (INDOT)
60. Public and consulting party comments regarding the Aesthetic Design Guidelines will be provided to the design-build team for consideration during final design. (INDOT)

**For Further Consideration:**

1. If there is additional impervious area over what is currently there, the project must consider the downstream capacity of the existing storm sewer system. (MCSWMD)
2. The project must comply with the *City of Indianapolis Storm Water Design and Construction Manual* including Chapter 700 for post-construction water quality requirements. (MCSWMD)
3. The project shall include sufficient temporary erosion and sediment control measures during all phases of construction. (MCSWMD)
4. Consider native plantings within the right-of-way. CORRIDORS (Conservation On Rivers and Roadways Intended to Develop Opportunities for Resources and Species) is a program to develop habitats for grassland-dependent species and to foster improved pollinator habitat along roadways and waterways. Program partners include INDOT, USDA NRCS, Pheasants Forever and Quail Forever. You may contact the South Region Landscape Biologist, Erin Basiger, at Deer Creek Fish & Wildlife Area, 2001 W. CR 600 South, Greencastle, IN. The new Urban Wildlife Program has potential cost-share and technical assistance available for native plantings and other urban habitat projects. You may contact the South Urban Biologist, Megan Dillon, at Atterbury Fish & Wildlife Area, 7970 S Rowe Street, Edinburgh, IN 46124, (812) 526-4891, mdillon@dnr.IN.gov, for information regarding assistance with establishment of pollinator habitat, trees and shrubs, native plugs, wetland habitat, rain gardens, nuisance Canada goose mitigation, and/or educational signage that could enhance the project area. (IDNR DFW)
5. Most transportation corridor designers and municipalities are trending toward LED lighting. Certain types of LED lighting can have negative impacts on both human and wildlife health and safety. The Division of Fish and Wildlife strongly encourages visiting the International DarkSky Association's website to learn more about the potential negative impacts of improper impacts of improperly selected LED lighting systems, if required: <http://darksky.org/lighting/led-practical-guide/>. (IDNR DFW)
6. Consider a more sustainable approach to stormwater management. The traditional model of stormwater management aims to drain urban runoff as quickly as possible with the help of channels and pipes, which increases peak flows and costs of stormwater management. A more sustainable approach aims to rebuild the natural water cycle by using storage techniques (retention basins, constructed wetlands, raingardens, etc.), recharging groundwater using infiltration techniques (infiltration basins or trenches, pervious pavement, etc.), and reusing runoff for irrigation elsewhere in the basin. (IDNR DFW)
7. Consider strategies to reduce diesel emissions, such as project construction/demolition contracts that require the use of equipment with clean diesel engines and the use of clean diesel fuels. (USPEA)



8. Use energy efficient lighting, including the use of solar powered lights when feasible. (USEPA)
9. Incorporate native saplings and shrubs into the landscape plan for the right-of-way, to help reduce noise, and maintain air quality for nearby residences and trail users. (USEPA)



FONSI REQUEST

ATTACHMENT E: ADDITIONAL INFORMATION FOR  
NOISE BARRIER 3W (NB3W)

**Table E1. NB3W Barrier Analysis**

NB3W - WB I-70 along the edge of shoulder from the Commerce Ave overpass to the Lewis Street/Monon overpass. This noise barrier examines abatement of future noise levels at residential receivers R100 through R119

**Feasibility Criteria**

Achieve a 5 dBA reduction at a majority (>50%) of impacted receptors

**Reasonability Criteria**

Design goal of 7 dBA noise reduction for >50% of benefited first row receptors.

Receptors are considered to be benefited when they receive at a minimum 5.0 dB(A) reduction in the future noise levels.

Cost of noise barrier per benefited receptor shall not exceed \$25,000.

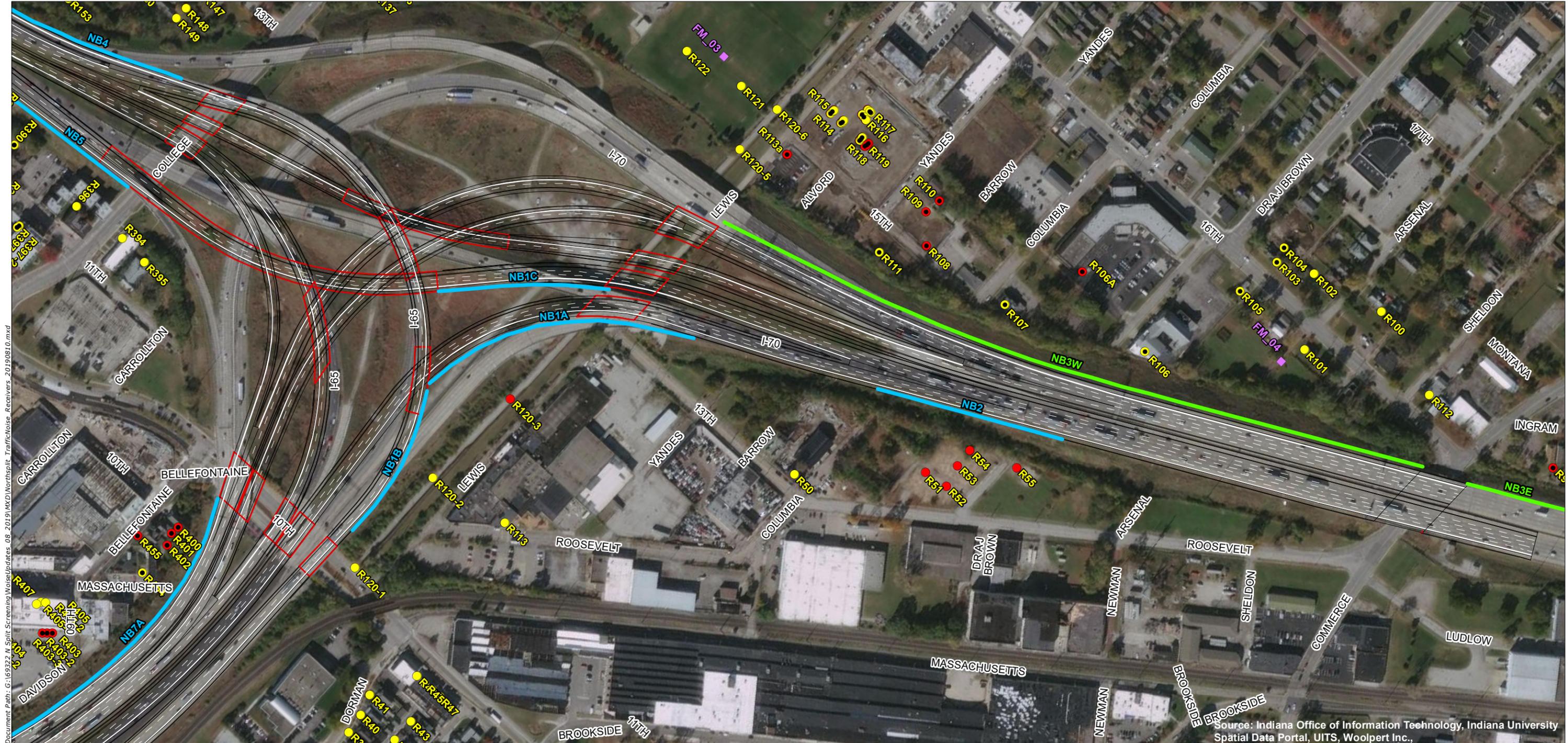
Active Receivers	Future w/o Barrier	Increase (Future w/o Barrier - Existing)	Future w/ Barrier off structure	Future w/ Barrier on structure	Difference between barrier off and on structure	Approach or Exceed NAC (Impacted)	Benefited Receptor	Impacted, and 5 dBA reduction	Design Goal: 7 dBA reduction and first row
R100	65.6	-0.9	62.3	62.3	0.0	No	No	No	No
R101	65.8	-1.8	60.6	60.6	0.0	No	Yes	No	No
R102	65.3	-0.7	60.4	60.4	0.0	No	No	No	No
R103	64.9	-0.8	59.9	59.9	0.0	No	Yes	No	No
R104	64.9	-0.6	59.8	59.8	0.0	No	Yes	No	No
R105	64.9	-1.2	59.9	59.8	-0.1	No	Yes	No	No
R106	41.6	-2.0	35.7	35.7	0.0	No	Yes	No	No
R106A	66.7	-0.4	59.0	59.0	0.0	Yes	Yes	Yes	Yes
R107	43.5	-0.3	35.7	35.7	0.0	No	Yes	No	Yes
R108	67.4	-0.5	59.5	59.3	-0.2	Yes	Yes	Yes	Yes
R109	66.4	-0.6	59.3	59.0	-0.3	Yes	Yes	Yes	No
R110	66.2	-1.0	58.9	58.6	-0.3	Yes	Yes	Yes	No
R111	42.8	-1.3	34.6	34.4	-0.2	No	Yes	No	Yes
R112	45.3	2.9	40.3	40.3	0.0	No	Yes	No	No
R113a	66.1	-2.9	62.5	60.5	-2.0	Yes	No	No	No
R114-1	64.5	-2.3	56.9	53.9	-3.0	No	Yes	No	No
R114-2	65.1	-2.8	57.7	55.0	-2.7	No	Yes	No	No
R114-3	65.7	-3.0	58.8	56.9	-1.9	No	Yes	No	No
R115-1	62.2	-2.2	60.9	59.5	-1.4	No	No	No	No
R115-2	63.0	-2.8	61.9	60.6	-1.3	No	No	No	No
R115-3	64.0	-2.7	63.0	61.9	-1.1	No	No	No	No
R116-1	63.5	-2.0	57.6	54.7	-2.9	No	Yes	No	No
R116-2	64.2	-2.5	58.9	56.5	-2.4	No	Yes	No	No
R116-3	65.3	-2.5	60.9	59.4	-1.5	No	No	No	No
R117-1	56.1	-1.3	51.4	51.4	0.0	No	No	No	No
R117-2	56.9	-1.7	52.3	52.2	-0.1	No	No	No	No

**Table E1. NB3W Barrier Analysis**

R117-3	57.9	-1.4	54.0	53.9	-0.1	No	No	No	No
R118-1	64.4	-2.6	59.6	58.0	-1.6	No	No	No	No
R118-2	65.1	-3.1	60.7	59.2	-1.5	No	No	No	No
R118-3	66.1	-2.9	62.2	61.1	-1.1	Yes	No	No	No
R119-1	67.8	-0.8	58.2	58.2	0.0	Yes	Yes	Yes	No
R119-2	69.0	-1.2	59.2	59.2	0.0	Yes	Yes	Yes	No
R119-3	69.9	-1.1	60.6	60.5	-0.1	Yes	Yes	Yes	No

<b>Feasibility</b>			
Number of impacted receptors	% of impacted receptors receiving a 5 dBA reduction	Does the noise barrier design achieve a 5 dBA reduction at a majority (>50%) of impacted receptors?	<b>Yes</b>
63	75%		
<b>Reasonability</b>			
<b>Design Goal</b>			
First row receptors	% of benefited first row receptors with a 7 dBA reduction	Design Goal: Is there a 7 dBA reduction for 50% of the benefited first row receptors?	<b>Yes</b>
29	62%		
<b>Cost-effectiveness</b>			
Noise Barrier	2,301	Is the cost per benefited receptor less than or equal to \$25,000 per benefited receptor receiving a minimum reduction of 5 dBA?	<b>Yes</b>
Noise Barrier	14-20		
TNM Area of	37,721		
Estimated	\$1,131,630		
Number of	116		
Cost per	\$9,755		



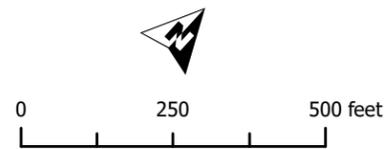


Document Path: G:\169322 N Split Screening\Noise\Updates\_08\_2019\WKD\Northsplit\_TrafficNoise\_Receivers\_20190810.mxd

Source: Indiana Office of Information Technology, Indiana University Spatial Data Portal, UITS, Woolpert Inc.,

### Legend

- Not Impacted / Not Benefited
- Impacted / Not Benefited
- Not Impacted / Benefited
- Impacted / Benefited
- Field Measurement Sites
- Noise Barriers Analyzed
- Feasible and Reasonable Noise Barrier



### Revised Noise Barrier 3W

### Traffic Noise Analysis Maps

Des No. 1592385 and 1600808

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Marion County, IN  
Revised: 8/24/2020