

Appendix

GLOSSARY OF TERMS

NOISE ABATEMENT

INDOT: Noise barriers [Brochure]

Solid obstructions built between the highway and homes or residences along a highway to reduce highway noise by 5-10 dB [generally construed as a 14-foot high or greater vertical wall near the right-of-way]. INDOT continues to monitor advances in technologies in addition to evaluating other methods of addressing traffic noise and its related impacts. [See Alternative Noise Abatement Strategies]

FHWA: Traffic Noise Impacts Criteria

Design year build condition noise levels that approach or exceed the FHWA NAC listed in Table 1 for the future build condition; or design year build condition noise levels that create a substantial noise increase over existing noise levels.

Project Type 1 Criteria:

The physical alteration of an existing highway where there is restriping existing pavement for the purpose of adding a through-traffic lane or an auxiliary lane.

Existing Noise Levels: The worst noise hour resulting from the combination of natural and mechanical sources and human activity usually present in a particular area.

NOISE ABATEMENT STRATEGIES

Barrier Rail: continuous truck height [45" or higher] F-shape concrete barrier rails at outer shoulder lane edge to reduce wheel-pavement noise propagation near source.

Quiet Pavement: open-graded asphalt, rubber-modified asphalt, longitudinal diamond-grooved concrete.

FHWA 2010 Federal Register

"It is FHWA's position that there are still too many unknowns regarding pavement to consider its use as a noise abatement measure. These issues include acoustic longevity and construction variability. The FHWA has provisions for highway agencies to enter into a Quiet Pavement Pilot Program or to perform Quiet Pavement Research. The FHWA acknowledges the valuable research performed by various highway agencies; however, the regulation must be applicable nationwide and not just in one State. No changes were made to this provision".

BRIDGE CLEARANCE

INDOT Design Manual: CHAPTER 54-3.02(03) Geometric Design of Existing Freeway (3R) or (4R) Partial Reconstruction.

The minimum vertical clearance is 16 ft over the entire roadway including the usable shoulder widths for both the left and right shoulders. If practical, the 16-ft clearance should be provided at each overpass within the project limits. If the 16-ft clearance cannot be obtained, a design exception will be required. However, for the routes in Marion County listed below, an existing overpass with a vertical clearance of at least 14 ft may be retained without a design exception.

1.I-65 from I-465 South to I-465 North;

2.I-70 from I-465 East to I-465 West; and

3.I-465 from I-69 Westward to I-65 North.

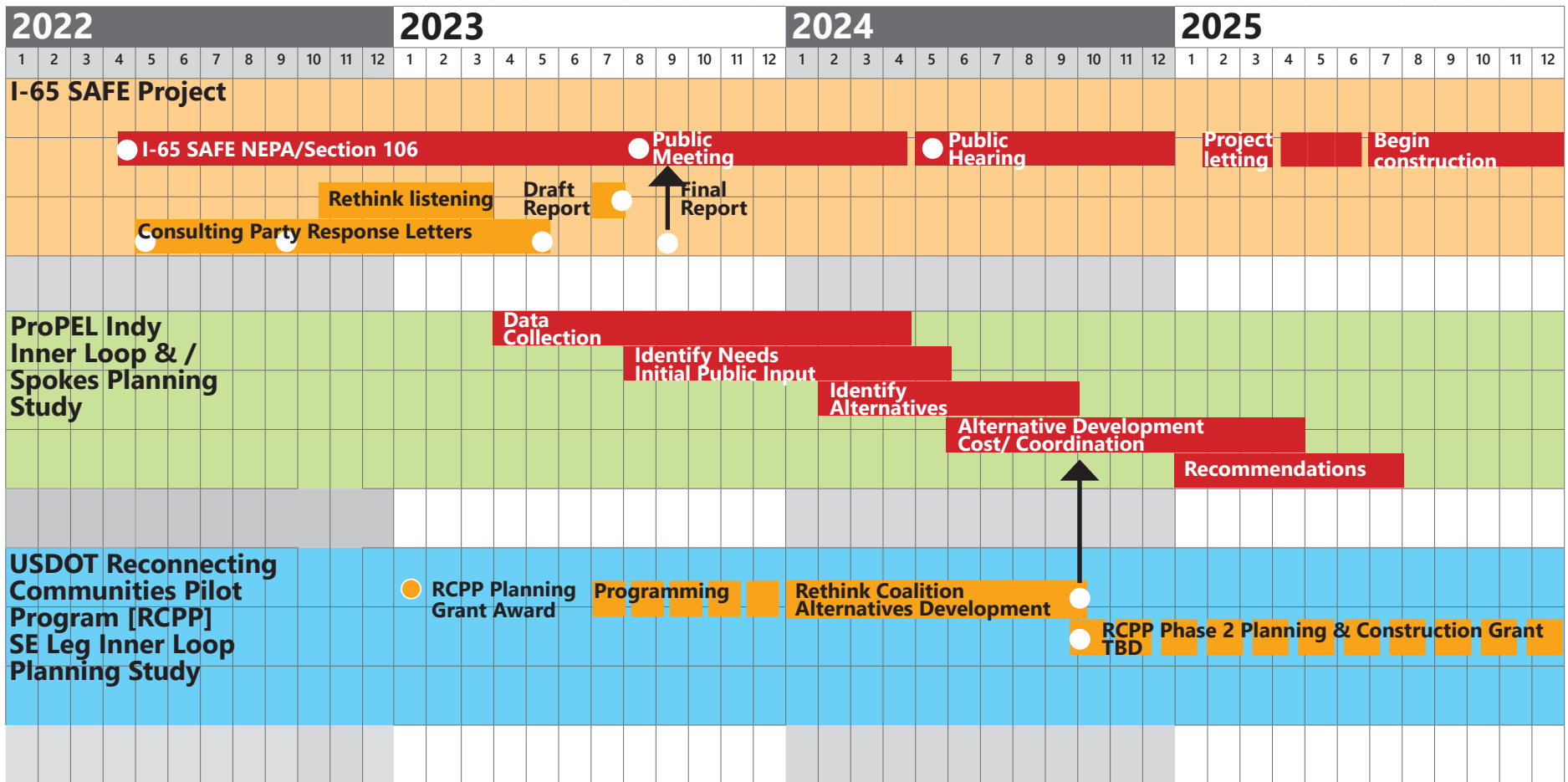
A low-clearance warning sign should be provided for each structure with a vertical clearance of less than 14.5 ft.

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Rethink Coalition I-65 SAFE Project Interaction Timeline

5/6/22	9/29/22	11/1/22	11/10/22	2/9/23	2/28/23	5/14/23	8/21/23	9/5/23
<p>Rethink Coalition Consulting Party Response:</p> <p>Express concerns about:</p> <ul style="list-style-type: none"> • Adding lanes into the inner loop • Apparent project segmentation <p>Request for collaborative engagement</p>	<p>Rethink Coalition Consulting Party Response:</p> <p>Express concerns about basis for adding lanes, absent updated traffic counts</p>	<p>INDOT Public Meeting</p> <p>Express concerns about:</p> <ul style="list-style-type: none"> • Adding lanes into the inner loop • Request for collaborative engagement 	<p>Rethink Coalition Design Committee Meeting</p> <p>Parsons attended to share project schedule and update</p>	<p>Coordination Meeting with City & INDOT</p> <p>Express concerns about:</p> <ul style="list-style-type: none"> • Adding lanes into the inner loop • Potential impact on recently applied for RCPP Grant • Review EJ concerns 	<p>Rethink Coalition awarded \$2M Reconnecting Communities Pilot Program (RCPP) planning grant.</p>	<p>Rethink Coalition Consulting Party Response:</p> <ul style="list-style-type: none"> • Presents fourteen point outline of Rethink Coalition observations and recommendations as basis for 8/22/2023 report 	<p>Rethink Coalition Meeting with INDOT & release of Observations & Recommendations Report:</p> <ul style="list-style-type: none"> • Specific recommendations for each element of the I-65 SAFE project with emphasis on improved multimodal interface through underpasses and overpasses • Recommendations for alternative noise abatement strategies • Support for four lanes in each direction but not for fifth NB lane and its required widening of bridges 	<p>Rethink Coalition Consulting Party Observations & Recommendations Report Update:</p> <ul style="list-style-type: none"> • Request updated I-65 SAFE Project purpose & need statement that reflects RCPP and ProPEL Indy study areas • Modified recommendations based on 8/29 Public Information Meeting

INNER LOOP RECONSTRUCTION CONCURRENT PROJECT TIMELINES



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Rethink 7/26/23 Community Meeting Questionnaire Responses

SUMMARY

Individual responses follow this Summary.

Number of Questionnaires	13
Neighborhoods represented:	
Bean Creek	6
Fountain Square Alliance	2
Bates-Hendricks	1
West Indy	1
Garfield Park	2
Fountain Square	1

Those that use the Red Line, get to it by:

Walking	5
Biking	2
Driving	3

Which underpasses do you use most frequently:

Raymond	3
Shelby	3
Bradbury	2
Nelson	2
Southern	2
East St over I-70	1
Keystone	1
Morris over I-65	1
Naomi	1
10th Street	1

TRANSCRIBED COMMENTS

- I do not want bridges widened. Underpasses are already wide and take a long time to walk under. Let's not add to that.
- When I drive this stretch of I-65 at all times of the day, I only hit traffic issues close to Southport. Why not focus further south?"
- I use the Redline sometimes on weekends. When I drive my destination is mainly Fountain Square.
- We could use a break from construction. I believe folks want to know the bottom line impact and positivity for our neighborhood."
- I use Keystone underpass everyday, sometimes multiple times a day.
- I would really like to see Rethink recommendations happen. It will be better for children going to school and I will start using the bus more.
- I don't own a car. Greenway system on INDOT ROW is great idea but design should be sure to include shade trees and noise buffers.
- I agree no added lanes on corridor. Would not improve traffic flow or safety.
- Morris-Prospect lanes seem wide? 16' WB lane seems excessive. Could widen side path adding shade trees or similar buffer.
- Minimize slip lanes on exit/entrance ramps. Ideally none.
- Small detail: signage needed on MUP like Hanna & Shelby that keeps pedestrians and bikes from mingling. [Current disregard] is annoying and potentially dangerous."
- I work late so I drive for my safety. If the highway is reconfigured (editor: responder referring to Raymond underpass)
- Implement pedestrian only tunnels to connect one side to the other.
- Excited to hear more about Naomi, Pleasant Run bridge underpass proposals.
- I use the interstate to get to suburbs.
- Please consider safer pedestrian and bicycle passage on ALL the bridges that I-65 passes over.
- I don't want any more inconvenience on I-65. What is the value to local residents vs non downtown residents?
- These were once vibrant neighborhoods that were torn apart by losing the connectivity of the streets that made safe easy passages to other homes, schools, churches and business.
- By utilizing the cityscape for attractive housing we absolutely need better street, landscapes, passage ways and connectivity between these neighborhoods.
- I would like to use the BRT more if easier to get to the Pleasant/Shelby stop
- Would walk bike more if PRP and Shelby were better lit and safer.
- I use the interstate when leaving the city, not for local trips.
- I appreciate the safety recommendations proposed by Rethink.

Rethink 7/26/23 Community Meeting Questionnaire Responses

4.



QUESTIONNAIRE -I-65 SAFE PROJECT

June 26, 2023

July

1. Where do you live?
Neighborhood: BEAN CREEK
Street Address: 1520 E. GIMBER ST

2. Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive

Which station do you use most often?
Fill in: _____

3. When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive

Comment?
Fill in: _____

4. When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
Fill in: N&S

No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
Fill in: _____

(room on back for more comments)

2.



QUESTIONNAIRE -I-65 SAFE PROJECT

June 26, 2023

July

1. Where do you live?
Neighborhood: BEAN CREEK
Street Address: 2425 DANION ST

2. Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive

Which station do you use most often?
Fill in: _____

3. When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive

Comment?
Fill in: _____

4. When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
Fill in: over & under pass @ BRIDGWAY

No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
Fill in: _____

(room on back for more comments)

Rethink 7/26/23 Community Meeting Questionnaire Responses

3.



QUESTIONNAIRE - I-65 SAFE PROJECT

June 26, 2023

July

- Where do you live?
Neighborhood: Fountain Square Alliance
Street Address: 1544 Draper Street, Indianapolis 46203
- Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk *I don't use them as often as I would like - if it were easier to get to the Pleasant + Shelley Stop from my home.
 Drive
 Which station do you use most often?
 Fill in: I would use them more regularly.
- When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive
 Comment?
 Fill in: I would walk + bike more if there were 2 overpasses. I have to go under were better lit + safer. (Pleasant Run + Shelley)
- When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
 Fill in: Pleasant Run and Shelley St.
 No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
 Fill in: I mainly use the Interstate when leaving the city

(room on back for more comments)

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QUESTIONNAIRE - I-65 SAFE PROJECT

3.

- Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

I really appreciate the safety recommendations being proposed by Rethink - thank you for your efforts to help improve our neighborhood!

I would love to ask for public art and more greenery and native plants added to the underpasses/areas leading up to them.

I do NOT want the bridges, especially in FSA, to be widened. The underpass are already wide and take a long time to walk under. Lets not add to that.

Additionally, I've driven that stretch of I-65 semi-regularly to get to errands/appointments in the Southport area - at all times of day - I never hit traffic issues until getting close to Southport. Why not focus further south?

Rethink 7/26/23 Community Meeting Questionnaire Responses



4.

QUESTIONNAIRE - I-65 SAFE PROJECT

June 26, 2023

July

1. Where do you live?
Neighborhood: Bean Creek
Street Address: Hoefgen St.

2. Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive

Which station do you use most often?
Fill in: _____

3. When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive

Comment?
Fill in: _____

4. When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?

Yes, which one most often?
Fill in: Southern - Nelson

No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
Fill in: _____

(room on back for more comments)

4.

5. Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

I don't want any more inconvenience on I-65. What is the value of residents vs non downtown residents

Rethink 7/26/23 Community Meeting Questionnaire Responses

5.



QUESTIONNAIRE – I-65 SAFE PROJECT

June 26, 2023
July

- Where do you live?
Neighborhood: West Indy
Street Address: 714 Shepard St.
- Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive
 Which station do you use most often?
 Fill in: _____
- When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive
 Comment?
 Fill in: _____
- When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
 Fill in: _____
 No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
 Fill in: _____

(room on back for more comments)

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6.



QUESTIONNAIRE – I-65 SAFE PROJECT

June 26, 2023
July

- Where do you live?
Neighborhood: BATES - HENDRICKS
Street Address: ORANGE
- Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive
 Which station do you use most often?
 Fill in: _____
- When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive
 Comment?
 Fill in: _____
- When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
 Fill in: BATES - FLETCHER PLACE (EAST ST. OVER 70) ST MORRIS
 No, I generally drive on the Interstate. My destination is generally: BATES - F.W.T. SQUARE
 Suburb
 Downtown
 Other:
 Fill in: _____

(room on back for more comments)

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Rethink 7/26/23 Community Meeting Questionnaire Responses



7.

QUESTIONNAIRE - I-65 SAFE PROJECT

June 26, 2023
Only

*Bernie
Orr*

1. Where do you live?
Neighborhood: BEVAN CREEK
Street Address: 2349 S RANDOLPH 46208

2. Do you use the Red Line stations?

Yes, and to get to a station, I:

- Ride a bike
- Walk
- Drive

Which station do you use most often?

Fill in: _____

3. When you go to work, shop, or visit friends do you use a

- Bike
- Walk
- Drive

Comment?

Fill in: READ LINE SOMETIMES ON WEEKEND

4. When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?

Yes, which one most often?

Fill in: SOUTHERN AVE & NELSON & BRADSHAW

No, I generally drive on the Interstate. My destination is generally:

- Suburb
- Downtown
- Other:

Fill in: MAINLY FOUNTAIN SQUARE

(room on back for more comments)

7.

5. Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

WE NOW HAVE HAD
CONSTRUCTION GOING ON NOW
FOR 4 OR 5 YEARS

WE COULD USE A BREAK
FROM CONSTRUCTION ONLY
IF POSSIBLE

I BELIEVE FOLKS
WANT TO KNOW
THE BOTTOM LINE
WHAT THE IMPACT
WILL BE AND THE
POSITIVITY FOR
OUR NEIGHBORHOOD

Rethink 7/26/23 Community Meeting Questionnaire Responses



9.

QUESTIONNAIRE - I-65 SAFE PROJECT

June 26, 2023
July

- Where do you live?
Neighborhood: Scencrub
Street Address: 2405 Dawson St
- Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive
 Which station do you use most often?
 Fill in: _____
- When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive
 Comment?
 Fill in: _____
- When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
~~No~~ Yes, which one most often?
 Fill in: I use the west side underpass the most - every day
 No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other: 465 West & East (mostly) South
 Fill in: _____

(room on back for more comments)

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QUESTIONNAIRE - I-65 SAFE PROJECT

9.

- Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

I would really like to see this happen!!
Thank you

It's better for children going to school and I will start using the bus more

Rethink 7/26/23 Community Meeting Questionnaire Responses



10.

QUESTIONNAIRE - I-65 SAFE PROJECT

June 26, 2023

Jilly

- Where do you live?
Neighborhood: Fountain square
Street Address: 1140 Shelby St
- Do you use the Red Line stations?
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive

Which station do you use most often?
Fill in: Fountain sq, 42nd, Stackhouse
- When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive

Comment?
Fill in: Don't own car. Also use bus
- When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
Fill in: Shelby St

No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
Fill in: _____

(room on back for more comments)

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QUESTIONNAIRE - I-65 SAFE PROJECT

10.

- Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

greenway system on INDOT ROW is great, but design should be sure to include shade trees and noise buffer because adjacent to freeway it can be loud and hot and therefore unpleasant.

I agree no added lanes on corridor. would not improve traffic flow nor safety.

Morris-prospect lanes seem wide? 16' WB lane seems excessive. could widen sidewalk adding shade trees or similar buffer.

Minimize slip lanes on exit/entrance ramps. Ideally none.

Small detail: signage on the MUPs, like Hanna & Shelby, that keep pedestrians & bikes from mingling. For instance people walk on the bike path of the cultural trail instead of the ped side and it can be annoying & potentially dangerous.

Rethink 7/26/23 Community Meeting Questionnaire Responses



12.

QUESTIONNAIRE – I-65 SAFE PROJECT

June 26, 2023

July

1. Where do you live?
 Neighborhood: Ft. Sq. Alliance
 Street Address: 1433 S State Ave
2. Do you use the Red Line stations?
 Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive
- Which station do you use most often?
 Fill in: Pleasant Run
3. When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive
- Comment?
 Fill in: _____
4. When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to a nearby neighborhood?
 Yes, which one most often?
 Fill in: Raymond, Pleasant Run, Shelby, Naomi
- No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:
 Fill in: _____

(room on back for more comments)

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 QUESTIONNAIRE – I-65 SAFE PROJECT

1a.

5. Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

Excited to hear more about Naomi & Pleasant Run bridges & underpass proposals



13.

QUESTIONNAIRE - I-65 SAFE PROJECT

June 26, 2023
July

1. Where do you live?
Neighborhood: Garfield Park
Street Address: 902 E Garfield Dr

2. Do you use the Red Line stations? seldom
Yes, and to get to a station, I:
 Ride a bike
 Walk
 Drive

Which station do you use most often?
Fill in: Garfield Park

3. When you go to work, shop, or visit friends do you use a
 Bike
 Walk
 Drive

Comment? I65
Fill in: The underpasses need to be improved for

4. When you go to work, shop, or visit friends, do you use an I-65 underpass or bridge to
a nearby neighborhood?
 Yes, which one most often?

Fill in: Bradbury & Raymond

No, I generally drive on the Interstate. My destination is generally:
 Suburb
 Downtown
 Other:

Fill in: _____

(room on back for more comments)

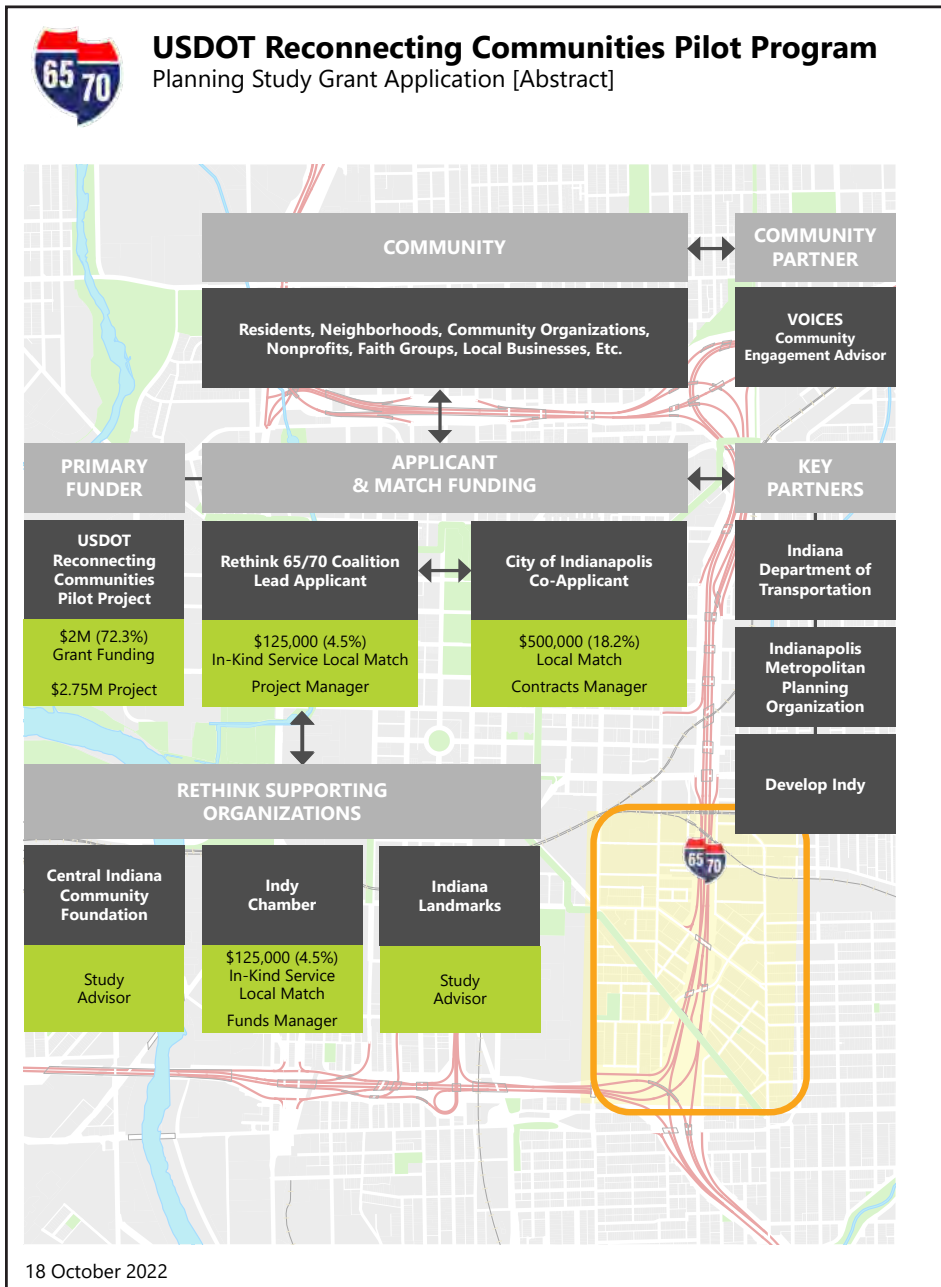
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QUESTIONNAIRE - I-65 SAFE PROJECT

13.

5. Do you have suggestions or comments about Rethink Coalition's recommendations for the I-65 SAFE Project?

Please consider safer pedestrian and bicycle passage under all the bridges that I65 passes over. These were once vibrant neighborhoods that were torn apart by losing the connectivity of the streets that made safe easy passages to other homes, schools, churches and businesses. By utilizing the city scape for attractive housing we absolutely need better street, landscapes, passage way & connectivity between these neighborhoods.

Appendix: Reconnecting Communities Pilot Program



RECONNECTING COMMUNITIES PILOT PROGRAM & I-65 SAFE PROJECT

The *I-65 SAFE Project* corridor is one of multiple national interstate corridors that feed and pass through the Downtown Indianapolis Interstate 65/70 Inner Loop. The project is the culmination of legacy safety, mobility and expansion projects that have incrementally expanded the corridor between Louisville and Indianapolis over the last decade. Rethink generally supports the SAFE project as an opportunity to heal injustices that the 1970's interstate created, while still resolving technical design, capacity and maintenance issues of the facility as it approaches downtown Indianapolis.

RETHINK COALITION FOCUS

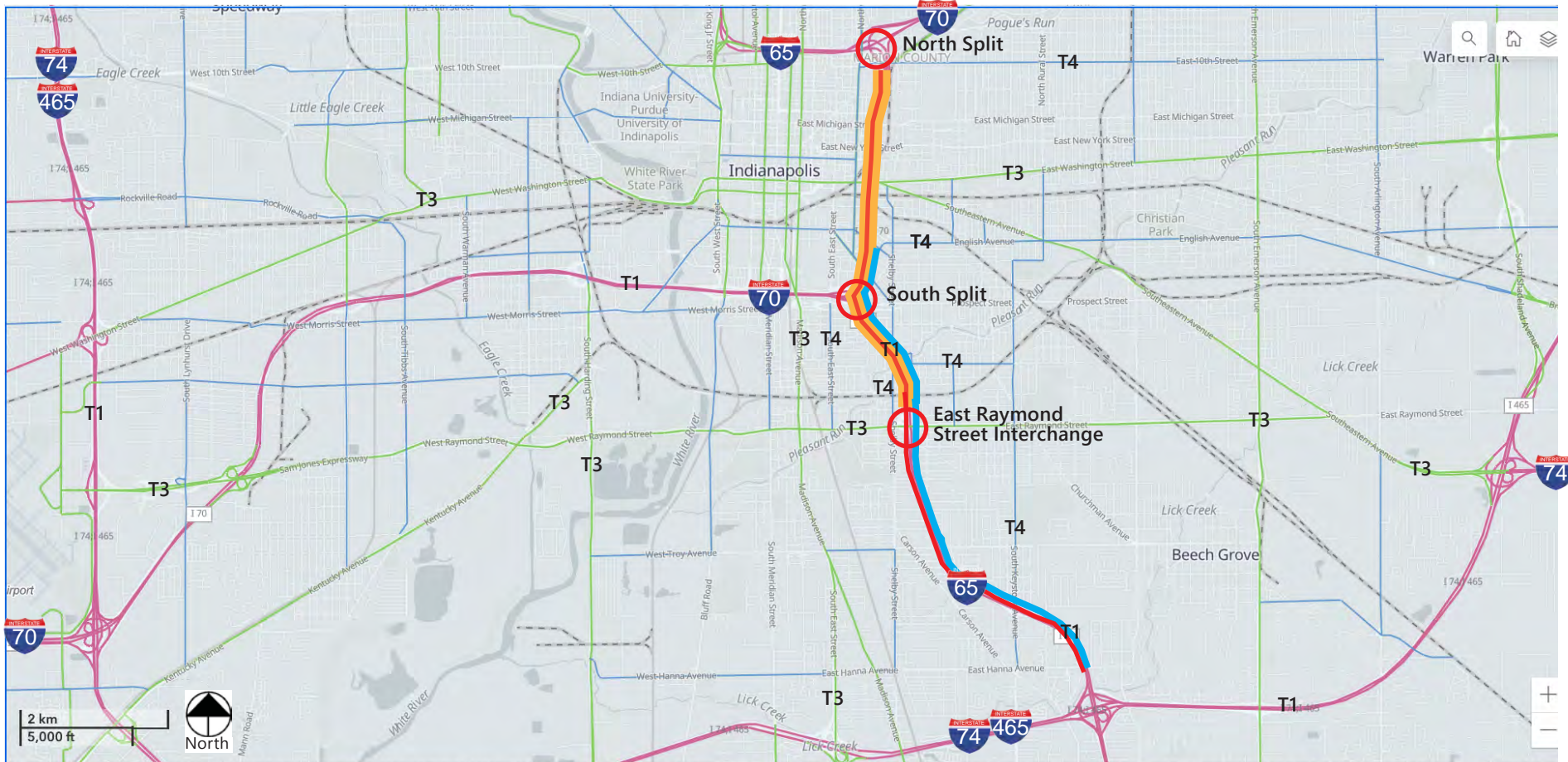
But Rethink also cautions that the SAFE project's interface with the Inner Loop must not impede a more creative, reparative and balanced reconstruction of the inner loop as a transformative model of connectivity and placemaking.

The US Department of Transportation's recent award of a *Reconnecting Communities Pilot Program [RCCP]* planning grant to the Rethink Coalition is a validation of that vision and focus.

The recommendations contained in this report are intended to help shape the SAFE project to support rather than subvert that vision. Since INDOT'S ProPel program specifically excludes the SAFE project corridor, Rethink comments and recommendations are critical to how SAFE can better align with that ProPEL purpose.

Reconnecting Communities Planning Grant activity will occur in the highlighted area of the adjacent graphic while the ProPEL Indy process addresses the inner loop and selected spokes to/from I-465

Appendix: Regional Freight Plan Network



Legend

- SAFE Project
- Tier 1 Primary Freight Network
- Tier 2 NA
- Tier 3 Regional Freight Corridors
- Tier 4 Freight Connectors
- Primary Freight Network Bottlenecks

the Central Indiana economy as well as a significant factor in the overall efficiency of the Indianapolis Thoroughfare Plan and Interstate System. Two of the three current bottlenecks of the Primary Freight Network occur on I-65 between Raymond Street and the South Split and I-65/70 between the South and North Splits. The SAFE project is a wrap-up of projects initiated by the FAST Act of 2015 which dedicated funds specifically to freight network issues such as those. Rethink is concerned however that SAFE project focus on the I-65 main line corridor inadequately addresses the finer grain issues and impacts of its interface with local systems.

Appendix: Rethink Consulting Party Letter dated 5/06/22



May 6, 2022

Leah Konicki
Principal Investigator - Architectural Historian
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, IN 46256
via email to: lkonicki@ascgroup.net

Re: FHWA Project: I-65 Safety and Efficiency Project, ECL, Indianapolis, Marion County, Indiana, Des. No. 1400073, et al.

Dear Ms. Konicki:

Thank you for the opportunity to provide our comments regarding environmental effects associated with the above referenced project. Rethink Coalition values our cooperative relationship with INDOT and the five-years we have spent working together to improve the functioning of the downtown interstate loop and minimizing its impact on adjacent neighborhoods.

Rethink Coalition has an interest in the I-65 Safety and Efficiency Project [Des. No. 1400073] due to our multiple stakeholders' and members' legal and economic and geographic relation to the project and its affected properties. We are confirming our interest in participating as a Consulting Party. However, Rethink Coalition believes that in addition to the project's multiple environmental effects that reasonable alternatives should be presented before advancing the Section 106 process.

Reasonable Alternatives

CEQ regulations (40 CFR §§ 1500-1508) address the basic decision-making framework established in NEPA. It outlines the principles of NEPA decision making, which includes analysis of a range of reasonable alternatives to the proposed project and consideration of appropriate impact mitigation. (See https://www.environment.fhwa.dot.gov/nepa/trans_decisionmaking.aspx.)

The Indy Chamber and Rethink Coalition, with funding assistance from the Lilly Endowment, released a study in August of 2021 that examined and found viable an alternative to the recommendation of the Project Intent Report of 2016, which guided the North Split construction. This study, the **Indianapolis Inner Loop Comparative Study**, is published at this link: <https://rethink65-70.org/updates/indy-chamber-rethink-coalition-release-study-of-inner-loop-interstate-rebuild-alternatives>. INDOT and key partners were on the Advisory Committee for the study and had input as it went along.

This study shows a viable alternative that should be considered before the I-65 Safety and Efficiency Project proceeds further. Rethink Coalition believes that your project has not complied with the fundamental NEPA requirement that reasonable alternatives be studied before advancing the Section 106 process. To proceed without addressing reasonable alternatives would raise the question of project segmentation.

We believe the alternative recessed interstate concept studied in the **Indianapolis Inner Loop Comparative Study** is viable based on the Indy Chamber/Rethink Coalition study, and that your project will impact the ability of the recessed interstate concept to be realized. Of particular concern are:

1. Adding lanes to I-65 and I-70 that will induce the need to add lanes to the rest of the downtown interstate system;
2. The proposed Project provides no analysis as to whether the widened and rebuilt project area will prevent or complicate reasonable alternatives for reconstruction for the rest of the Inner Loop; and
3. There is no reference in the Project to having considered the Indianapolis Inner Loop Comparative Study, INDOT's System Level Analysis (described below), or other reasonable alternatives developed subsequent to the 2015 Project Intent Report cited in the project proposal (we have not yet had access to that 2015 PIR to further analyze it).

System Level Analysis Performed for the North Split Should be Revisited with Updated Traffic Data

To address the issue of logical termini for the North Split, the INDOT NEPA process performed a System Level Analysis: <https://northsplit.com/wp-content/uploads/2018/05/North-Split-System-Level-Analysis.pdf>.

The **System Level Analysis** was for the downtown Indianapolis interstates. As a result of the **System Level Analysis**, INDOT determined it was appropriate to minimize the width and footprint of interstate expansion and to not add through lanes to the North Split project. Rethink Coalition believes that this systems level review should be updated with current traffic data. We also believe the same finding may apply to the current project and an updated System Level Analysis for the South Split project may not support adding additional lanes to the downtown interstate system.

Segmentation and Connected Actions

FHWA requires that the project or action being evaluated in the NEPA process meet three principles in order to avoid commitments to transportation improvements before the impacts are fully evaluated: 1) connect logical termini and be of sufficient length to address environmental matters on a broad scope; 2) have independent utility or independent significance, i.e., be usable and be a reasonable expenditure even if no additional transportation improvements in the area are made; and 3) not restrict consideration of alternatives for other reasonably foreseeable transportation improvements.

We believe that segmentation of the overall downtown interstate into separate projects is occurring, based on the North Split project, the recent expansion of the North Split project, this current project, and the 2016 North Split Project Intent Report. We object to project segmentation and seek INDOT's support and cooperation to enable more collaborative engagement and further review and study.

Collaborative Engagement

Rethink is interested in working with INDOT and other key partners on a collaborative assessment of transportation alternatives, particularly with USDOT's new programs and priorities. Working together has the potential to bring greater federal resources to our city and state and lead to a powerful, community-supported effort. We believe in the future of Indianapolis and a multi-state and downtown interstate system and look forward to working with INDOT on developing a stellar and transformative vision for the downtown interstate system in Indianapolis.

We are available to meet with the INDOT Team whenever convenient for you. Please include the following people in your communications:

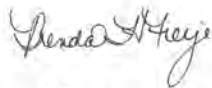
Appendix: Rethink Consulting Party Letter dated 5/06/22

Brenda Freije, bfreije@rethink65-70.org, (317) 850-0141
Russell Menyhart, rmenyhart@tafilaw.com, (202) 997-0681
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Thank you again for this opportunity to provide our comments.

Sincerely,

Rethink Coalition



Brenda Freije
CEO and President



Charles Richardson
Board Co-Chair



Russell Menyhart
Board Co-Chair

Board of Directors

Jennifer Baskerville-Burrows
Bruce Buchanan
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Committee Chairs

Paula Brooks, Environmental Justice & Equity
Meg Storrow, Design
Advisors
Marsh Davis, Indiana Landmarks
Mark Fisher, Indiana Realtors
Michael Huber, Indy Chamber
Paul Knapp, Young & Laramore
Brian Payne, CICF
David Gogol, Civic Leader
Kim Irwin, Health by Design

cc:

Congressman Andre Carson
Jeff Bennett, Deputy Mayor of Community Development, City of Indianapolis
Dan Parker, Director of Indianapolis Public Works
Vop Osili, President, Indianapolis City-County Council
Zach Adamson, Vice President, Indianapolis City-County Council
Meg Purnsley, Executive Director, Indianapolis Historic Preservation Commission
Anna Gremling, Executive Director, Indianapolis MPO
Phyllis Boyd, Director of Indy Parks & Recreation
Dan Bortner, Director, Indiana DNR
Chad Slider, Assistant Director for Environmental Review, Indiana DNR
Kären Haley, Executive Director, Indianapolis Cultural Trail Inc.
Glenn Blackwood, President, Historic Indianapolis Neighborhoods, Inc.
Jeremy Kranowitz, CEO and President, Keep Indianapolis Beautiful, Inc.

Appendix: Rethink Consulting Party Letter dated 9/29/22



Consulting Party Letter, Des# 140073
September 29, 2022

September 29, 2022

Mr. Doug Terpstra
Project Manager/Principal Investigator - Architectural Historian
ASC Group, Inc.
800 Freeway Drive North, Suite 101
Columbus, OH 43229
Via email: dterpstra@ascgroup.net

Re: FHWA Project: I-65 Safety and Efficiency Project, Indianapolis, Marion County, Indiana, Des. No. 1400073, et al.

We are responding to your letter dated September 2, 2022, considering the previously issued April 2022 project overview and the August 2022 historic property report. Thank you for the information you gave us at the consulting party meeting on September 19.

Historic Property Report - Area of Potential Effects (APE)

Six National Register of Historic Places (NRHP) cultural resources are listed:

1. Fletcher Place Historic District
2. Holy Rosary-Danish Church Historic District
3. Fountain Square Commercial Historic District
4. Indianapolis Park and Boulevard System Historic District
5. Horace Mann Public School No. 13
6. Wheeler-Shebler Carburetor Company/Wheeler Arts Community

Five cultural resources were recommended as NRHP-eligible:

1. St. Patrick Catholic Church Historic District
2. 937 E. English Avenue
3. 948 E. English Avenue
4. Sanders-Childers House
5. Green Lea Farm/Hotel Tango Farms

General Comments and Approach

You have our May 6 comment letter that explains who we are and why we are so interested in this Safety and Efficiency Project. We're continuing to analyze all the information INDOT's team has now provided and will want to touch base during this process on many specifics our experts suggest in the areas of system preservation, congestion mitigation, retaining walls and vegetative buffers, crossing overpasses, bike-ped accommodation and cross-interstate connectivity opportunities, noise barriers, and the overall approach to environmental justice issues, which are very important to us.

We are doing that in a constructive and collaborative spirit of public engagement for the future of this part of the southside. This is one of the most robust historically-protected clusters of properties within the City and County. We must get it right, and the Rethink Coalition is ready to work with INDOT to make this interim project better. We speak for the Rethink Board, its Committees, and Advisors, in saying we want to work with you to make Indianapolis the most livable city in the country and a welcoming place for those who want to live, work, and visit here. You'll find on our website our [Inner Loop Comparative Study](#) released a year ago that we'll be discussing as a part of INDOT's recently announced ProPEL Indy initiative. We are vitally interested in how this interim Safety and Efficiency Project fits within that larger Inner Loop transformation that will be on the table the next couple of years. This is a once-in-a-two or three generation transformation opportunity for our City and State.

Detailed Comments

Here are specific concerns and comments we would like to discuss with you:

1. We agree with the report's characterization of the SAFE project as an *Interim Project [anticipated to begin in 2025]* rather than a *Major Project*. It is largely *system preservation and congestion mitigation*, without the impacts and costs of a major project. Unlike the North Split, this interim project is intended to be replaced by a future major project rebuild *[not likely to occur until 2035-2037]*. We want to work with INDOT with that approach in mind.
2. The SAFE project's congestion mitigation and system preservation measures are both good. *System preservation* pushes the need for *Major Project* expansion further out, which is good so far as the total Inner Loop reconstruction is concerned. *Congestion mitigation* improves air quality and addresses other environmental concerns. The expansion component is measured and appropriate in that context. The added lane in both directions [which initially worried us] is generally absorbed within the existing pavement footprint by utilization of existing median space.
3. However, since that footprint starts getting wider from Pleasant Run to the South Split, we will likely weigh in strongly during the environmental process on how that can be addressed by well-designed retaining walls and vegetative buffers rather than with rip-rap or other least cost measures. Our consultants are well versed in those methods and can assist once corridor cross sections become available. The qualitative experience for both freeway users and adjacent residents over that 10-year period is highly dependent on design and construction considerations agreed upon during the NEPA process.
4. We will try to make constructive suggestions on how new crossing overpasses, such as Hanna (especially near U Indy and surrounding neighborhoods) need better bike-ped accommodation and identify other cross-interstate connectivity opportunities. You heard from neighbors about that at the September 19 meeting.
5. We also can offer constructive recommendations, as environmental review CP's, regarding the noise barrier walls, INDOT/Greenfield District's apparent commitment to provide an overlay to the entirety of existing concrete [if it is a Rubber-modified asphalt (RMA) overlay] is laudable and will dramatically reduce CO2 and particulates, pavement

Appendix: Rethink Consulting Party Letter dated 9/29/22

Consulting Party Letter, Des# 140073
September 29, 2022

service life, wheel noise and the perceived need for those costly and ugly noise walls. That significant cost savings can be applied to amenities such as the vegetation component that benefits both the adjacent neighborhoods as well as freeway users [talking about the Indy arrival experience here as an important design parameter... it's why Rethink declined noise barriers for the North Split].

6. We were pleased to see that the Morris/Prospect bridge remains untouched by the limited scope SAFE project, becoming a candidate for a Rethink-inspired transformative gateway and connectivity element in future Inner Loop work.
7. The APE project boundaries do not include the adjacent Garfield Drive Historic District (added to the NRHP on February 14, 2022) or St. Mark's AME Zion Church (NRHP pending application). Norwood, an historically black neighborhood established in the 1800s, is also not included in the APE project boundaries. We urge your correction to those oversights.
8. A high number of Indiana Landmarks historic covenant/easement properties exist in the North Square area that should be considered since the entire western boundary of the neighborhood is adjacent to the northern end of the APE.
9. The traffic study report of 2015 uses data from 2012. More recent traffic data should be utilized to make these decisions and updates should be made if necessary. Again, we want to discuss your analysis to support why and how lanes are to be added. That big issue came up during the September 19 meeting, and per our earlier letter, we are concerned that adding lanes will force the addition of lanes to the Inner Loop in the future.

Conclusion

The sheer magnitude of historic structures associated with the APE of this project is important. Between the National Register district neighborhoods of Fletcher Place and Holy Rosary-Danish Church as well as the Fountain Square Commercial district, well over 350 individual structures are covered. If the Garfield Drive Historic District were included in an expanded APE, that would take the number of individual NRHP protected structures up to over 550 individual structures.

This is one of the most robust historically-protected clusters of properties within the City and County. And note, these numbers do not account for the nuances of the State Register-only Indianapolis Auto Industry Thematic Resources nomination or the Indianapolis Historic Preservation Commission's local historic districts, which are similarly bounded, but in some places larger than the NRHP protections. In addition to these concerns, the Indianapolis Park & Boulevard historic district contains Pleasant Run, which I-65 directly crosses over. The impact of this intrusion requires further study and a USDOT Section 4(f) analysis of impacts to the Pleasant Run Greenway and its park system.

We look forward to future discussions with INDOT and their cultural resource management subcontractors on how the project's design and construction will address these critical project

Consulting Party Letter, Des# 140073
September 29, 2022

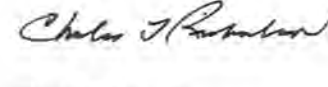
elements. We stand ready to meet any time to pursue the collaborative engagement suggested at the end of our May 6 comments and the September 19 consulting party meeting. We want robust community engagement, and we know that INDOT wants that too. There is much to do, and we are ready to help. Onward to a better City and State!

Sincerely,

The Rethink 65/70 Coalition



Brenda Freije
CEO and President



Charles Richardson
Board Co-Chair



Russell Menyhart
Board Co-Chair

Cc: Consulting Party List
Coalition Board of Directors and Committee Chairs
Mayor Hogsett, City of Indianapolis

Appendix: Rethink Consulting Party Letter dated 5/14/23



May 14, 2023

Doug Terpstra
Project Manager/Principal Investigator ASC
Group, Inc.
800 Freeway Drive North, Suite 101
Columbus, OH 43229
Via email: dterpstra@ascgroup.net

Re: FHWA Project: I-65 Safety and Efficiency Project, Indianapolis, Marion County, Indiana, Des. No. 1400073, et al.

Dear Mr. Terpstra,

Rethink Coalition appreciates the opportunity to respond to the April 11, 2023, Addendum to the August 2022 Historic Property Report (“HPR”) for the above-referenced SAFE project. This letter provides our summary comments to the Addendum. Please note that we have also prepared a comprehensive report providing detail and context to the comments, which we will separately convey as a supporting document.

These comments are based on several listening meetings between Rethink Coalition advisors and representatives of neighborhoods and districts affected by the proximity of I-65. Most, if not all, session attendees represent Consulting Parties and have attended Consulting Party and other public meetings concerning the SAFE project. We believe the comments accurately convey their collective aspiration that the project proceed guided by sensitivity to environmental principles of the Section 106 process and current federal policy priorities.

The principles and priorities in our comments can help ensure that the SAFE project enhances safety, mobility and efficiency for vehicles and addresses those factors through an environmental justice lens so that project’s multimodal interface with local streets and communities *repairs* rather than *intensifies* historic damage done to neighborhoods and districts by the interstate itself...damage that persists as a daily experienced socio-economic quality-of-life issue, often for disadvantaged populations.

Comments

- 1) We commend the HPR consultants for the detailed research on the locally significant historic architect, Louis Gibson. Additional research by Rethink Coalition advisors further supports the assumption that he did design 928 East English Avenue, as reflected in this quote:

It may be possible to confidently attribute 928 E English Ave to architect Louis Gibson with further research. The team consulted with local Louis Gibson expert, Danita Davis, on the matter. The original homeowner, local brick contractor Daniel Foley, filed for a building permit for a "brick house," posted on April 13, 1896 on page 6 of the Indianapolis News. Note that the street address changes three times in the area, which can be referenced from the 1887 Sanborn Fire Insurance Map and the 1898 Sanborn Fire Insurance Map (in the version with the paste-ups visible). One month later, in The Clay-Worker periodical of May 1896, Louis Gibson published an article regarding modern brickwork and steel lintels. Of note is figure 3, which he described as "...a Dutch arch of alternate courses of stone and brick. This form is frequently used in Holland, but instead of the brick lintel form or the use of the T-iron, there is the stone lintel, with the stone molding and the stone and brick arch of the form". See: <https://babel.hathitrust.org/cgi/pt?id=uiuo.ark:/13960/t0007c2x&view=1up&seq=437> The illustration in the article is very similar to 928 E English Ave and should be further studied.

Rethink Coalition

Page 1 of 4

- 2) We agree with the decision to expand the SAFE project area in Pleasant Run Parkway (an NRHP-listed resource and 4F property that could demonstrate net benefit), and Morris Street, within the Area of Potential Effects (“APE”). In addition, we agree with the decision to include the Garfield Drive Historic District (NR-2672), 928 East English Avenue (IHSSI No. 098-296-01614), and 878-880 Fletcher Avenue (IHSSI No. 098-296-01607).
- 3) While we are disappointed that North Square neighborhood structures are not recommended for individual NRHP, their presence within the NRHP Virginia Avenue Historic District of the Fountain Square Commercial Area should provide equivalent consideration and allow Rethink Coalition to revisit their individual status as part of the Reconnecting Communities Pilot Program planning study for that section of I-65/70.
- 4) We are also disappointed that the St. Mark Temple AME Zion Church is being recommended as *ineligible* for the listing in the NRHP. We note, for the record, that referencing *Bethel AME Church* as a more worthy surviving AME Church based on architectural style(s) and historic associations fails to mention that its historic building has been sold and converted to commercial use. In contrast, St. Marks remains an intact and active congregation in its near-century-old, compromised but restorable building, albeit with less readily available documentation of its unquestionable place in local African American history. We recommend further research to document its history and standing.
- 5) **Hanna Street Bridge Shared Use Path:** We commend the SAFE project for improved connectivity across the interstate barrier provided by this element but note its non-compliance with safety standards, being too narrow and with its bicycle-pedestrian lane that’s counterflow to adjacent traffic along an unprotected curb drop-off. We will forward a feasible design modification to the INDOT design team that addresses this concern while requesting that it be noted in the final 106 document.
- 6) **Bridge Widening above Multiple Crossing Local Streets:** These are important but currently deficient portals for neighborhood bicycle-pedestrian connectivity through the interstate barrier that should be addressed by this SAFE project, which currently proposes actually widening some bridges, thereby intensifying deficiencies below them. *We will forward to the INDOT design team our recommended and feasible design modifications addressing this concern applicable to most underpasses while requesting that it be noted in the final Section 106 document.*
- 7) **Raymond Street Interchange:** This interchange is an extreme example of disincentivizing multimodal connectivity across the interstate zone, having had three relatively recent pedestrian fatalities (an anomaly within the overall corridor), as well as being a mobility bottleneck at the convergence of three Freight Network corridors: I-65 Primary Freight Corridor, Raymond Street Regional Freight Corridor, and the Shelby Street Freight Connector. *We will forward to the INDOT design team our detailed recommendations for mitigating these issues and better conforming to the safety/mobility purpose of the project while requesting that this be noted in the final Section 106 document.*
- 8) **Pleasant Run Bridges:** This multi-span bridge pair currently impacts the watercourse and greenway below by its drainage and shading of extensive unvegetated earth areas that adversely affect stream water quality and greenway connectivity experience. If the northbound bridge is widened, as the SAFE project proposes, those conditions will worsen and trigger a Section 106/4F issue, which typically requires mitigation with a net benefit to the impacted resource (the widening issue is discussed in Item 11). *We will forward to the INDOT design team our detailed recommendations for mitigating these issues to better conform to the safety/mobility purpose of the project while requesting that this be noted in the final Section 106 document.*

Rethink Coalition

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- 9) **Shelby Street Bridges:** This pair of low-skewed bridges passes over Shelby Street, a freight network connector street with a cycle track along a substandard southbound travel lane. The low height and nearly 200-foot travel distance create a daytime entry zone “black hole” effect on drivers’ vision, which can be mitigated by an appropriate lighting luminance threshold at the entry, while overall day and night lighting needs more background luminance on all surfaces for detection of objects/persons within the underpass. We also recommend including reconfigured underpass lanes defined by low-profile median barriers to protect the bridge structures, motorists, and adjacent cycle track users, and entrance/exit transitions with reduced turning conflicts for the overall safety of this high-traffic area. Implementation will require interagency coordination. *We will forward to the INDOT design team our detailed recommendations for this bridge while requesting that this be noted in the final 106 document.*
- 10) **Morris/Prospect Interchange Area:** This is currently a pedestrian/cyclist dead zone created by interstate construction through what had been an important neighborhood connector. We recommend specific interventions at entry and exit ramps and bridge lane adjustments to facilitate safe bike/ped crossing between Fountain Square and Bates-Hendricks neighborhoods. Based on more recent traffic counts and trends, feasibility appears reasonable for this interim solution in the context of an interim project in advance of longer-range planning of an optimized South Split and Inner Loop configuration. This relatively straightforward approach requires interagency coordination. *We will forward to the INDOT design team our detailed recommendations for mitigating these issues to better conform to the safety/mobility purpose of the project while requesting that this be noted in the final Section 106 document.*
- 11) **Morris/Prospect NB 65/WB 70 Ramp Bridges:** We agree that the existing northbound three-lane approach to a pair of two-lane bridges over Morris/Prospect is confusing and leads to unsafe weaving well beyond critical decision points. However, we disagree with the need to expand the northbound I-65 bridge to rectify that. Instead, we propose a more cost-effective alternative of reconfiguring northbound inner lane pinch points that occur south and north of the bridge in conjunction with restriping for one added NB lane throughout the corridor.

We reiterate our earlier assertion that SAFE project mobility objectives can be largely met without the additional cost of bridge expansion for a continuous *auxiliary* lane in addition to the added lane in each direction. The proposed auxiliary lane, as configured, is a virtual fifth lane within an expanded cross-section that enters the South Split. A *ProPEL Indy* systems level alternatives analysis is the preferred selection basis for *any* expansion into the South Split (other than lane reallocation striping) in advance of the RCPP-funded planning project for the SE leg of 65/70. *We will forward to the INDOT design team our detailed recommendations regarding these issues while requesting that this be noted in the final Section 106 document.*
- 12) **Noise Study:** We support the SAFE project noise study as a required activity of the project and look forward to its results, which we believe will document the need for remediation of a public health/quality of life issue even before roadway expansion is factored in. We request an open discussion of viable alternatives to the standard noise walls that we consider problematic in effectiveness and in their visual and confining impact on neighborhoods immediately adjacent to I-65 and within the APE. Our review of tested alternatives indicates the existence of equally or more effective mitigation devices. *We will forward to the INDOT design team our recommendations for mitigating noise impacts while requesting that this be noted in the final Section 106 document.*
- 13) **Traffic Data:** We recommend updating the ten-year-old traffic data that has been projected forward as the basis for the needed improvements. This will give greater credibility to the primary thrust of the SAFE project while discouraging overbuilding in an interim project. Post-pandemic conditions have dramatically altered assumptions about peak hour congestion, a driving factor in freeway volume/capacity metrics. It is an appropriate time to update the old data now

that the North Split has largely reopened and post-pandemic *work-from-home* statistics are stabilizing at around a 24% of the workforce, a large number. This appears to be an easing of non-freight peak hour traffic volume to and within the Inner Loop. It is believed to be accompanied by a more regional absorption and spreading of averaged traffic volumes within the overall regional transportation network rather than a reduction in absolute numbers. Nevertheless, it is still very relevant to the rightsizing of the interim project. Noteworthy is that a broad spectrum of capital markets confirms this phenomenon, with a portion of the downtown office market converting to residential and mixed-use occupancy, further impacting commuter traffic patterns. This is relevant to the Section 106 process in that with allocating the limited funds of this project, it may be more achievable to mitigate current environmental and social justice issues if more accurate current data supports reducing some aspects of facility expansion now driven by old data.

- 14) **Aggregated Truck and General Traffic Data:** We also recommend disaggregating combined traffic counts to separate general traffic (AADT) from freight traffic (AADTT/trucks) to clarify the role freight traffic *travel time reliability* in considerations of economic impact have driven congestion mitigation projects such as the SAFE project and its precursor, the FAST projects. A better public understanding of that dynamic will focus attention and generate greater support for an *interim project* more narrowly targeted on mitigating current and still present historical issues that dovetail rather than complicate future major projects while still meeting its primary purpose.

Thank you for your consideration of our comments and recommendations. We stand ready to discuss them at your convenience in our shared pursuit of a very successful SAFE project.

Sincerely,

Rethink Coalition

Brenda Freije
CEO and President

Charles Richardson
Board Co-Chair

Russell Menyhart
Board Co-Chair

cc: Consulting Party List
Coalition Board of Directors and Advisors
Indy Chamber
Mayor Joseph Hogsett, City of Indianapolis

END