

**Subject of email: FHWA Project: Des. No. 1400073, et al.; HPR, I-65 Safety and Efficiency Project, Marion County, Indiana**

**Des. No.:** 1400073, et al.

**DHPA No.:** 29059

**Project Description:** I-65 Safety and Efficiency Project

**Location:** Marion County, Indiana

The Indiana Department of Transportation, with funding from the Federal Highway Administration, proposes to proceed with the I-65 Safety and Efficiency Project, Des. No. 1400073, et al. The Section 106 Early Coordination Letter for this project was originally distributed on April 8, 2022.

As part of Section 106 of the National Historic Preservation Act, a Historic Property Report (HPR) has been prepared and is ready for review and comment by consulting parties. In addition, an archaeological assessment has been prepared and is included in the attached Report Distribution Letter.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE), and respond with any comments that you may have. You can also find a copy of the report on the project website, <http://i65safetyandefficiency.com/about/> and scroll to the bottom of the page. If a hard copy of the materials is needed, please respond to this email with your request as soon as possible.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

***Tribal Contacts please respond to INDOT's Tribal Liaison, Matt Coon*** at [mcoon@indot.IN.gov](mailto:mcoon@indot.IN.gov) (317-697-9752) with any responses pertaining to this project including to provide INDOT/Indiana FHWA additional information about Tribal resources/concerns and questions/comments regarding cultural resources. The FHWA point of contact is Kari Carmany-George at [K.CarmanyGeorge@dot.gov](mailto:K.CarmanyGeorge@dot.gov) (317-226-5629).

In addition, as part of Section 106 of the National Historic Preservation Act, you are invited to a consulting parties meeting to discuss the effects of the project on historic properties within the project's Area of Potential Effects (APE). The meeting will be held in person at Southeast Community Services on Monday, Sept. 19 at 4 p.m.

**In-person meeting details:**

Location: Southeast Community Services, 901 Shelby Street, Indianapolis, IN 46203

Date: Monday, September 19, 2022

Time: 4:00 p.m.

Attendees can also choose to take part in the meeting virtually.

**Virtual meeting details:**

Location: Microsoft Teams (Join on your computer's web browser, or the desktop/mobile app)

Link: [Click here to join meeting](#) | If prompted, Meeting ID: 265 946 009 350, Passcode: FXn2rx

Call in: 951-465-7634 | Phone Conference ID: 795 571 489#

Virtual attendees will use the “chat” function to share any questions and comments. For questions about the virtual meeting component, you may contact Berry Craig of Parsons at 270-705-1640 or [berry.craig@parsons.com](mailto:berry.craig@parsons.com).

Thank you for your interest.



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N758-ES  
Indianapolis, Indiana 46204

PHONE: (855) 463-6848

**Eric Holcomb, Governor**  
**Michael Smith, Commissioner**

September 2, 2022

This letter was sent to the listed parties.

RE: FHWA Project: I-65 Safety and Efficiency Project, HPR, Indianapolis, Marion County, Indiana, Des. No. 1400073, et al.; DHPA No. 29059

Dear Consulting Party,

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration (FHWA), proposes to proceed with the I-65 Safety and Efficiency Project (Des. No. 1400073, et al.), in Indianapolis, Center and Perry townships, Marion County, Indiana. ASC Group, Inc. is under contract with Parsons, to complete the Section 106 documentation for the referenced project.

This letter is part of the Section 106 review process for this project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. We are requesting comments from you regarding the possible effects of this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

A Section 106 early coordination letter was distributed on April 8, 2022.

The proposed undertaking is on I-65 in the City of Indianapolis, Marion County, Indiana, from the north side of the I-465 interchange on the southeast side of Indianapolis, to approximately 650 feet north of Fletcher Avenue in downtown Indianapolis. It is within Center and Perry townships and on the 1984 Beech Grove, 1984 Indianapolis East, 1984 Indianapolis West, and 1986 Maywood, Indiana USGS Topographic Quadrangles, in Sections 12 and 13, Township 15N, Range 3E, and Sections 18, 19, 29, 30, and 32, Township 15N, Range 4E.

The project setting is urban. Surrounding properties are primarily residential, with a mixture of commercial and light industrial uses along arterial and rail corridors. Three existing trails and one proposed trail cross the project alignment. The Troy Avenue multi-use trail is beneath the I-65 bridge over Troy Avenue. The City of Indianapolis Parks and Recreation (IndyParks) Pleasant Run Trail greenway is along Pleasant Run Parkway South Drive, beneath the I-65 bridges over Pleasant Run and Pleasant Run Parkways. At Virginia Avenue bridge over I-65/I-70, the Cultural Trail greenway crosses over the project area. Additionally, there is a proposed greenway, the Lick Creek Trail, at the existing Hanna Avenue bridge over I-65.

Within the project area, I-65 is a barrier-divided highway classified as an Urban Freeway. The typical cross section has three travel lanes in each direction with auxiliary lanes at interchanges. Existing inside and outside shoulders are variable, averaging 10 to 17 feet wide.

There are 25 bridges and multiple culverts within the project area. Stormwater is mostly handled by overland flow to roadside ditches. Guardrail and overhead lighting are present throughout much of the corridor. Hanna Avenue over I-65 is a two-lane minor arterial road with one 13-foot travel lane in each direction, 5-foot outside shoulders, and no pedestrian facilities. The existing bridge over I-65 is a multi-span composite continuous steel beam bridge. Currently the bridge has concrete railing on the deck and the approaches. The Hanna Avenue bridge needs to be replaced in order to accommodate the added travel lanes.

The recommended alternative includes added travel lanes along I-65, pavement maintenance in the form of patching and overlay, and the replacement of the Hanna Avenue Bridge over I-65. The recommended alternative for the Hanna Avenue Bridge over I-65 is to replace the existing structure with a two-span composite, prestressed hybrid bulb-tee beam bridge. The new bridge would be on the same alignment with a similar grade (within 1 foot of existing). The recommended alternative also includes the proposed widening of the northbound (NB) bridges over Naomi Street, Pleasant Run and Pleasant Run Parkways, and Morris/Prospect Street. Most of the remaining bridge work would consist of pavement rehabilitation/overlays. It is likely multiple culverts and other small structures would be rehabilitated/lengthened or replaced as needed.

The recommended roadway work is summarized below.

- NB and southbound (SB) I-65 from 0.2 mile north of SB I-465 to 0.1 mile north of the Keystone Avenue interchange
  - Perform preventative maintenance on existing concrete pavement
  - Added travel lane in the NB and SB directions with outside widening
  - Overlay on the ramp bridge
- NB and SB I-65 from 0.1 mile north of the Keystone Avenue interchange to the Naomi Street Overpass
  - Perform preventative maintenance on existing composite pavement
  - Added travel lane in the NB and SB directions with inside widening
- NB I-65 from the Naomi Street Overpass to approximately 750 feet north of the Morris/Prospect streets Overpass
  - Perform preventative maintenance on existing composite pavement
  - Added travel lane in the NB and SB directions with inside and outside widening
- SB I-65 from Naomi Street Overpass to the Morris/Prospect streets Overpass
  - Perform preventative maintenance on existing composite pavement
- NB I-65 from Morris/Prospect streets to 650 feet north of Fletcher Avenue (the start of the NB I-65 exit ramp to Washington Street)
  - Pavement markings to extend the auxiliary lane to the existing exit ramp of Washington Street

Due to the proposed added travel lanes, a Noise Study is required. Noise barriers may be determined to be reasonable and feasible. The study area was expanded to include areas where barriers may be considered.

Most of the work would occur within existing, previously disturbed right-of-way (ROW). Strips of ROW may be required. Less than one acre of permanent and/or temporary ROW is anticipated.

The need for this project stems from congestion and pavement conditions along this section of I-65. During peak hours, there is a reduction of travel speeds. Level of service (LOS) is a performance measure that represents quality of service, measured on an A – F scale, with LOS A representing a free flow of traffic and LOS F representing a breakdown in flow (e.g., start-and-stop congestion). According to the January 2015 INDOT Project Intent Report, in 2012, project corridor segments experienced LOS D to F during the afternoon peak, and the congestion was predicted to worsen to all LOS F by the design year (2032). Regarding pavement, according to the (draft 2022) Abbreviated Engineers Report, the current pavement is suitable for rehabilitation, but is not otherwise deficient (detailed pavement studies are pending).

The purpose of the project is to reduce corridor congestion by providing a roadway with an increased LOS during peak hours for the design year, 2032, and to extend the life of the existing pavement by at least 10 years.

The maintenance of traffic (MOT) will be conducted in several phases. At least two travel lanes in each direction of I-65 will be maintained. Short term ramp and local street closures may occur. Additionally, Hanna Avenue and Naomi Street may be closed for up to one year and Morris/Prospect streets will possibly need short term lane closures during removal and beam placement operations. Construction is scheduled to begin in the Spring of 2025 and is anticipated to last up to 24 months.

In accordance with 36 CFR 800.2 (c), you were invited to become a consulting party as part of the Section 106 process, or you are hereby invited to become a consulting party as part of the Section 106 process. Entities that have previously accepted consulting party status—as well as additional entities that are currently being invited to become consulting parties—are identified in the attached list.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, to assess the undertaking's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE contains the following eight resources listed in the National Register of Historic Places (NRHP):

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

A historian who meets the Secretary of the Interior's Professional Qualification Standards identified and evaluated above-ground resources within the APE for potential eligibility for the NRHP. As a result of the historic property identification and evaluation efforts, the following four resources are recommended as eligible for listing in the NRHP:

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

With regard to archaeological resources, Andrea Crider, MA, RPA, a qualified professional archaeologist, reviewed the proposed project area and determined the I-65 Safety and Efficiency Project in Indianapolis, Marion County will not likely affect archaeological resources due to the project setting. The project appears to be limited to previously disturbed right-of-way consisting of existing roadways, existing pavement, and the wide raised berm upon which I-65 was constructed. Soils within the project are all mapped as mixed with urban land further suggesting that the presence of intact, significant archaeological resources is highly unlikely. According to the Indiana State Historic Architectural and Archaeological Research Database (SHAARD), there are no archaeological sites within or adjacent to the project area and the potential for such sites to be present within the project area is considered extremely low. Given these factors, it is recommended that the project be allowed to proceed without additional archaeological study. However, state law (Indiana Code 14-21-1-27 and -29) requires that if any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earth moving activities, that the discovery must be reported to the Department of Natural Resources within two (2) business days.

As noted above, the early coordination letter was distributed to invited consulting parties by email on April 8, 2022. See the attached Table of Consulting Party Respondents for a list of those who have accepted consulting party status. Some of those accepting consulting party status provided project comments; copies of those emails and letters are also attached.

In its response to the early coordination letter dated April 20, 2022, the State Historic Preservation Office (SHPO) had no recommendations for additional consulting parties, but asked to be advised as to which of the invited consulting parties accepted the invitation in the next regular correspondence on this project. The consulting parties list has been updated to highlight in gray those groups and individuals that have accepted the invitation to consult, and is attached to this letter.

The Historic Property Report (HPR) is available for review in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). You can also find a copy of the report on the project website, <http://i65safetyandefficiency.com/about> and scroll to the bottom of the page. You are invited to review these documents and to respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If you prefer a hard copy of this material, please respond to this email with your request as soon as possible.

Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party or if you have not previously accepted consulting party status and you do not respond to this letter, you will not be included on the list of consulting parties for this project and will not receive further information about the project unless the design changes. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

In addition, as part of Section 106 of the National Historic Preservation Act, you are invited to a consulting parties meeting to discuss the effects of the project on historic properties within the project's APE. The meeting will be held in person. The meeting is scheduled for Sept. 19 at 4 p.m.

**In person meeting details:**

Location: Southeast Community Services, 901 Shelby Street, Indianapolis, IN 46203

Date: Monday, Sept. 19, 2022

Time: 4:00 p.m.

Attendees can also choose to take part in the meeting virtually.

**Virtual meeting details:**

Location: Microsoft Teams (Join on your computer's web browser, or the desktop/mobile app)

Link: [https://bit.ly/65SE\\_CP\\_Meeting](https://bit.ly/65SE_CP_Meeting) | If prompted, Meeting ID: 265 946 009 350, Passcode: FXn2rx

Call in: 951-465-7634 | Phone Conference ID: 795 571 489#

Virtual attendees will use the "chat" function to share any questions and comments. For questions about the virtual meeting component, you may contact Berry Craig of Parsons at 270-705-1640 or [berry.craig@parsons.com](mailto:berry.craig@parsons.com).

For questions concerning specific project details, you may contact Doug Terpstra of ASC Group, Inc. at 614-268-2514 or [dterpstra@ascgroup.net](mailto:dterpstra@ascgroup.net). All future responses regarding the proposed project should be forwarded to ASC Group, Inc. at the following address:

Douglas S. Terpstra  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
800 Freeway Drive North, Suite 101  
Columbus, OH 43229  
[dterpstra@ascgroup.net](mailto:dterpstra@ascgroup.net)

**Tribal Contacts please respond to INDOT's Tribal Liaison, Matt Coon** at [mcoon@indot.IN.gov](mailto:mcoon@indot.IN.gov) (317-697-9752) with any responses pertaining to this project including to provide INDOT/Indiana FHWA additional information about Tribal resources/concerns and questions/comments regarding cultural resources. The FHWA point of contact is Kari Carmany-George at [K.CarmanyGeorge@dot.gov](mailto:K.CarmanyGeorge@dot.gov) (317-226-5629).

Sincerely,



Matthew S. Coon, Acting Manager  
Cultural Resources Office  
Environmental Services

Enclosure:

Consulting Parties List

Distribution List:

Beth McCord, Deputy State Historic Preservation Officer  
Chad Lethig, Indiana Landmarks  
Meg Purnsley, Indianapolis Historic Preservation Commission  
Brittany Crone, Mayor's Neighborhood Advocate  
Alicia Cardoza-Regalado, Mayor's Neighborhood Advocate  
Sean Northup, Indianapolis Metropolitan Planning Organization  
Cole Jackson, Indianapolis Metropolitan Planning Organization  
Miami Tribe of Oklahoma  
Dawn Olsen, Fletcher Place Neighborhood Association  
Charlie Richardson, Fletcher Place Neighborhood Association  
Jordan Ryan, North Square Neighborhood Association  
Jess Darling, Fountain Square Alliance  
Jeri Warner, University Heights Neighborhood Association  
Peoria Tribe of Indians of Oklahoma  
Frank Mascari, Indianapolis City Council, District 21  
Garfield Park Neighborhood Association (GPNA)  
David O'Rourke, President, GPNA  
Tom Jackson, Prospect Falls Neighborhood Association  
Marjorie Kienle, Historic Urban Neighborhoods of Indianapolis (HUNI)  
Jim Walker, Big Car Collaborative  
Janette Smith, Meridian-Raymond Neighborhood Association  
Derek Naber, Bates-Hendricks Resident  
James Bulow, Bates-Hendricks Resident  
Bates-Hendricks Neighborhood Association Board  
Taylor Hughes, Indy Chamber



Michael Huber, Indy Chamber  
Brenda Freije, Rethink Coalition  
Russell Menyhart, Rethink Coalition  
Charlie Richardson, Rethink Coalition  
Kevin Osburn, Rethink Coalition  
Meg Storrow, Rethink Coalition  
Vickie Goens, Garfield Park Neighborhood Association  
Kelsy Spaeth, Fountain Square Neighborhood Association  
Linda Adams, College of Health and Human Sciences, Purdue Extension Marion County  
Kathy McKimmie, Fletcher Place Resident  
Greg Moorman, Garfield Park Resident  
Ross Tepe, Area Resident  
Casey Hodges, Fountain Square Alliance  
Eastern Shawnee Tribe of Oklahoma  
Kelli Mirgeaux, Southeast Neighborhood Development (SEND)  
Glenn Blackwood, President, HUNI  
Jeffrey Christoffersen, Lockerbie Square Neighborhood Association and Foundation  
Glenn Blackwood, Fletcher Place Resident  
Bruce Colville, Fletcher Place Resident  
Carolyn Key, North Square Resident  
Scotty Z. Wilson, Holy Cross Neighborhood Association  
Peggy Frame, Southeast Community Services  
Jon and Marissa Crawford, Bates-Hendricks Neighborhood  
Rick Truex, Area Resident  
Kim Irwin, MPH, Administrator, Indiana Public Health Association  
Dawn Olsen, Fletcher Place Resident  
Carl and Danielle Gidley, Fountain Square Residents  
Stan Kiwor, SolIndy Resident  
Pauline Watson, SolIndy Resident  
Nick Baxter, Co-Chair, Greater Virginia Avenue Corridor EID  
Michael Taft, Co-Chair, Greater Virginia Avenue Corridor EID  
Paul Smith, Co-Chair, Greater Virginia Avenue Corridor EID  
Heidi Studebaker, Fletcher Place Resident  
Tom Beck, Garfield Park Neighborhood Resident  
Allissa Impink, Co-President, Fletcher Place Neighborhood Association  
John Andrews, Vice President, Shiel Sexton Company  
Andrew Kocher, University of Indianapolis  
Brian Payne, President and CEO, The Indianapolis Foundation and Central Indiana Community Foundation  
Melissa Brown, President, Old Southside Neighborhood Association  
The Old Southside Neighborhood Association Board  
Meg Storrow, Mass Ave Cultural Arts District and Mass Ave Merchants Association  
Paul Knapp, School 9, LLC  
Ashley Simmons, Fountain Square Alliance  
Jim Schweickart, Fletcher Place Resident  
Andy and Jennifer Kobe, Fletcher Place Residents  
Tom Denari, Young & Laramore

Paula Brooks, Hoosier Environmental Council

Austin Gibble, Administrator of Long-Range Transportation Planning, DMD, City of Indianapolis

Kären Haley, Executive Director, Indianapolis Cultural Trail, Inc.

Katherine Martin, Sanders-Childers House

Lana Heller, Owner of 941 E English Avenue

Rebecca Besser, Owner of 937 E English Avenue

Hotel Tango Farms, LLC, 702 Virginia Avenue, 46203, Owner, Green Lea Farm/Hotel Tango Farms

Roman Catholic Archdiocese of Indianapolis Properties, Inc., as Trustee for St. Patrick Catholic Church

Indianapolis, Inc., c/o Brian Burkert, CFO, 1400 N Meridian Street, Indianapolis, IN 46202

Consulting Party Respondents through June 14, 2022.

<b>Response Date</b>	<b>Name and Organization</b>	<b>Response</b>
April 8, 2022	Chad Lethig, Indiana Landmarks	Accepted
April 8, 2022	Meg Purnsley, Indianapolis Historic Preservation Commission	Accepted
April 8, 2022	Brittany Crone, Mayor's Neighborhood Advocate	
April 11, 2022	Alicia Cardoza-Regalado, Mayor's Neighborhood Advocate	Accepted
April 11, 2022	Sean Northup, Deputy Director, Indianapolis Metropolitan Planning Organization	
April 11, 2022	Miami Tribe of Indiana	Accepted
April 11, 2022	Dawn Olsen, Fletcher Place Neighborhood Association	Accepted
April 11, 2022	Charlie Richardson, Fletcher Place Neighborhood Association	Accepted
April 12, 2022 and May 6, 2022	Jordan Ryan, President, North Square Neighborhood Association	Accepted
April 13, 2022	Jess Darling, President, Fountain Square Alliance	Accepted
April 13, 2022	Jeri Warner, University Heights Neighborhood Association	Accepted
April 14, 2022	Peoria Tribe of Indians of Oklahoma	Accepted
April 19, 2022	Frank Mascari, Indianapolis City Councilman for District 21	Accepted
April 19, 2022	David O'Rourke, President, Garfield Park Neighborhood Association	Accepted
April 20, 2022	Beth McCord, Deputy State Historic Preservation Officer	Accepted
April 21, 2022	Tom Jackson, President, Prospect Falls Neighborhood Association	Accepted
April 22, 2022 and May 4, 2022	Marjorie Kienle, Historic Urban Neighborhoods of Indianapolis (HUNI)	Accepted
April 23, 2022	Jim Walker, Big Car Collaborative	Accepted
April 24, 2022	Janette Smith, Meridian-Raymond Neighborhood Association	Accepted
April 24, 2022	Derek Naber, Bates-Hendricks Resident	Accepted
April 24, 2022	James Bulow, Bates-Hendricks Resident	Accepted
April 24, 2022	Bates-Hendricks Neighborhood Association Board	Accepted
April 25, 2022	Taylor Hughes, Indy Chamber	Accepted
April 25, 2022	Michael Huber, President & CEO, Indy Chamber	Accepted
April 25, 2022	Brenda Freije, Rethink Coalition	Accepted
April 25, 2022	Charlie Richardson, Rethink Coalition	Accepted
April 25, 2022	Russell Menyhart, Rethink Coalition	Accepted
April 25, 2022	Vickie Goens, Garfield Park Neighborhood Association	Accepted

April 26, 2022	Kelsy Spaeth, President, Fountain Square Neighborhood Association	Accepted
April 27, 2022	Linda Adams, Community Wellness Coordinator, Purdue Extension Marion County	Accepted
April 28, 2022	Eastern Shawnee Tribe of Oklahoma	Accepted
April 29, 2022	Kathy McKimmie, Fletcher Place Resident	Accepted
April 30, 2022	Greg Moorman, Garfield Park Resident	Accepted
May 1, 2022	Ross Tepe, Area Resident	Accepted
May 3, 2022 and May 6, 2022	Brenda Freije, President and CEO, Rethink Coalition	Accepted
May 4, 2022	Casey Hodges, Fountain Square Alliance	Accepted
May 4, 2022	Jeri Warner, Coordinator, University Heights Neighborhood Association	Accepted
May 4, 2022 and May 5, 2022	Kelli Mirgeaux, President, Southeast Neighborhood Development	Accepted
May 5, 2022	Glenn Blackwood, President, HUNI	Accepted
May 5, 2022	Glenn Blackwood, Fletcher Place Resident	Accepted
May 5, 2022	Jeffrey Christoffersen, Lockerbie Square Neighborhood Association and Foundation	Accepted
May 5, 2022	Bruce Colville, Fletcher Place Resident	Accepted
May 5, 2022	Carolyn Key, North Square Resident	Accepted
May 5, 2022	Scotty Wilson, President, Holy Cross Neighborhood Association	Accepted
May 5, 2022	Peggy Frame, Executive Director, Southeast Community Services	Accepted
May 6, 2022	Jon and Marissa Crawford, Bates-Hendricks Neighborhood Residents	Accepted
May 6, 2022	Kim Irwin, MPH, Indiana Public Health Association	Accepted
May 6, 2022	Dawn Olsen, Fletcher Place Resident	Accepted
May 6, 2022	Carl and Danielle Gidley, Fountain Square Residents	Accepted
May 6, 2022	Stan Kiwor, SoIndy Resident	Accepted
May 6, 2022	Pauline Watson, SoIndy Resident	Accepted
May 6, 2022	Kelli Mirgeaux, President, and Nick Baxter, Co-Chair, Greater Virginia Avenue Corridor EID	Accepted
May 6, 2022	Heidi Studebaker, Fletcher Place Resident	Accepted
May 6, 2022	Tom Beck, Garfield Park Neighborhood Resident	Accepted
May 7, 2022	Rick Truex, Area Resident	Accepted
May 7, 2022	Allissa Impink, Co-President, Fletcher Place Neighborhood Association	Accepted
May 7, 2022	John Andrews, Vice President, Shiel Sexton Company	Accepted
May 7, 2022	Andrew Kocher, University of Indianapolis	Accepted
May 8, 2022	Melissa Brown, President, Old Southside Neighborhood Association	Accepted

May 8, 2022	Brian Payne, President and CEO, Indianapolis Foundation and Central Brian Payne, Indiana Community Foundation	Accepted
May 9, 2022	Meg Storrow, Mass Ave Cultural Arts District and Mass Ave Merchants Association	Accepted
May 9, 2022	Paul Knapp, School 9 LLC	Accepted
May 9, 2022	Ashley Simmons, Fountain Square Alliance	Accepted
May 9, 2022	Jim Schweickart, Fletcher Place Resident	Accepted
May 9, 2022	Andy and Jennifer Kobe, Fletcher Place Residents	Accepted
May 9, 2022	Tom Denari, President and CEO, Young & Laramore	Accepted
May 13, 2022	Paula Brooks, Hoosier Environmental Council	Accepted
May 13, 2022	Austin Gible, Long-Range Transportation Planning, Dept. of Metropolitan Development, City of Indianapolis	Accepted
May 18, 2022	Kären Haley, Executive Director, Indianapolis Cultural Trail, Inc.	Accepted

**I-65 Safety and Efficiency Project  
Des. No. 1400073, et al.  
Section 106 Consulting Parties List  
Gray highlighting indicates those who have  
accepted consulting party status**

Beth K. McCord, Deputy State Historic Preservation Officer

Indiana DNR Division of Historic Preservation and Archaeology  
402 W. Washington Street, W274  
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[bmccord@dnr.IN.gov](mailto:bmccord@dnr.IN.gov)

Joseph O'Connor, Marion County Board of Commissioners

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Barbara Lawrence, Marion County Board of Commissioners

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Indianapolis, IN 46204  
[mytaxes@indy.gov](mailto:mytaxes@indy.gov)

Julie Voorhies, Marion County Board of Commissioners

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Indianapolis Metropolitan Planning Organization (IMPO)

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Cole Jackson

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Indianapolis Department of Metropolitan Development

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Scarlett Andrews Martin, Director  
[scarlett.martin@indy.gov](mailto:scarlett.martin@indy.gov)  
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Dan Parker

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Meg Purnsley, Administrator

Indianapolis Historic Preservation Commission  
City-County Building  
200 E. Washington Street  
Indianapolis, IN 46204  
[meg.purnsley@indy.gov](mailto:meg.purnsley@indy.gov)

Joe Hogsett, City of Indianapolis Mayor  
200 E. Washington Street, Suite 2501  
Indianapolis, IN 46204

Brittany Crone, Mayor's Neighborhood Advocate (MNA)

Office of the Mayor  
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200 E. Washington Street, Suite 2501  
Indianapolis, IN 46204  
[Brittany.Crone@indy.gov](mailto:Brittany.Crone@indy.gov)  
(317) 495-4523

Alícia Cardoza-Regalado  
Mayor's Neighborhood Advocate (MNA)  
Center South/Center Southeast  
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200 E. Washington Street, Suite 2501  
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[Alicia.cardozaregalado1@indy.gov](mailto:Alicia.cardozaregalado1@indy.gov)  
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Steven Barnett, [srbarnett44@yahoo.com](mailto:srbarnett44@yahoo.com)  
Marion County Historian  
62 N. Layman Avenue  
Indianapolis, IN 46219

Mark Dollase, Vice President of Preservation  
Services  
Indiana Landmarks, Central Regional Office  
Indiana Landmarks Center  
1201 Central Avenue  
Indianapolis, IN 46202-3204  
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Chad Lethig, Indianapolis Preservation Coordinator  
Indiana Landmarks, Central Regional Office  
Indiana Landmarks Center  
1201 Central Avenue  
Indianapolis, IN 46202-3204  
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Carol A. Hall, President  
Marion County Historical Society  
P. O. Box 2223  
Indianapolis, IN 46206

Keith Brown, President  
Perry Township-Southport Historical Society  
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Eastern Shawnee Tribe of Oklahoma

Miami Tribe of Oklahoma

Peoria Tribe of Indians of Oklahoma

Pokagon Band of Potawatomi Indians

Shawnee Tribe

Delaware Nation of Oklahoma



Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256

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

Dear Ms. Konicki,

The University Heights Neighborhood Association requests to be included as a consulting party for the project indicated above due to the impact of I-65 on our neighborhood's transit options and quality of life.

In terms of the environmental impact of the proposed work, we want to stress that any work prioritizes improvements for pedestrian and bicycle traffic as they are impacted by I-65 and its bridges. We are concerned that the I-65 upgrades, including addition of lanes, will further degrade the connectivity between neighborhoods and interfere with or discourage bicycle and pedestrian traffic. For example, the interchange at Raymond St. already creates dangerous traffic and pedestrian conditions at the intersection of Shelby St. and Raymond St. Adding an additional southbound lane to I-65 will allow higher traffic flow and add to the congestion and danger to pedestrians and bicyclists as well as drivers. The I-65/Raymond St. interchange needs extensive redesign to take pressure off the Shelby-Raymond intersection where pedestrian traffic can be high due to the Red Line BRT stop there.

The Hanna Avenue Bridge should also be designed to support and protect pedestrian and bicycle traffic. Hanna Ave. is in great need of sidewalks and bikeways to connect residences east of Keystone Ave. where there are none, so bridge work should not preclude that possibility.

We also support the development of the proposed Lick Creek Trail greenway, so the plan for I-65 should be consistent with that goal.

In relation to Section 106, we are unaware of any historical, cultural, or archeological impacts of the proposed work, but would like to be informed of the culture and resource evaluation effort.

The best way to contact and consult with our association is by email, which is moderated by our leadership: [uheightsneighborhood@gmail.com](mailto:uheightsneighborhood@gmail.com) You or other representatives for this project are also welcome to speak at our neighborhood meetings. These are held the third Tuesday of every other month, starting in January. Our next meeting is May 17<sup>th</sup> and the following meeting is July 19<sup>th</sup>, both at 7:00 PM. Meetings are held at the Stierwalt Alumni House at the University of Indianapolis unless announced that it will be held at a different site or online.

Sincerely,

Jeri Warner, Coordinator

# RETHINK COALITION

May 3, 2022

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

The 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 would like to participate as a Consulting Party.

However, the 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) addresses 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.

[https://www.environment.fhwa.dot.gov/nepa/trans\\_decisionmaking.aspx](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 rebuilding the downtown Interstate based on the **January 2015 INDOT Project Intent Report** you cited. 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. The 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 is that adding lanes to I-65 and I-70 will induce the need to add lanes to the rest of the downtown interstate system.

### **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 to minimize the width and footprint of interstate expansion. The Rethink Coalition believes that this systems level review should be updated with current traffic data. We believe the same finding would be applied to the current project and no additional lanes added 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, this current project, and the recommendations of the 2015 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**

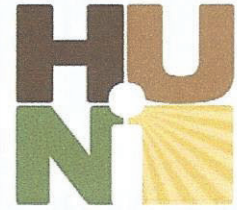
Rethink is interested in working with INDOT and other key partners on a collaborative assessment of transportation alternatives, particularly with USDOT's new programs and priorities. Working together has the potential to bring greater federal resources to our city and state and lead to a powerful, community-supported 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. Thank you again for this opportunity to provide our comments.

Sincerely,

Rethink Coalition

DRAFT



historic urban neighborhoods  
*of* I N D I A N A P O L I S

May 4, 2022

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

Dear Ms. Konicki,

We are writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

Historic Urban Neighborhoods of Indianapolis (HUNI) is a consortium of neighborhoods with a mission to promote the revitalization and preservation of Indianapolis' historic communities. Started in 1980, we work with over 25 historic neighborhoods to preserve their built environment and cultural heritage. Many of our neighborhoods suffered a significant decline due to the impact of the interstate in the 1970s and some are just now coming back from the consequences of how and where that highway construction occurred.

HUNI is concerned about:

1. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to historic districts and homes.
2. The lack of a Systems Analysis to support why and how lanes are to be added.
3. Unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks about their assessment.
4. Widening the Hanna Avenue bridge without accommodating latent pedestrian/bicycle demand from east of the Interstate to the University of Indianapolis on Hanna Avenue.
5. The widening of the Morris Street and Prospect street bridges to accommodate added travel lanes and the further impacts that will have on loss of connectivity for the Bates Hendricks neighborhood.
6. The connection of the North Split and South Split and how that impacts the residents and businesses that are located beside or near the highway.

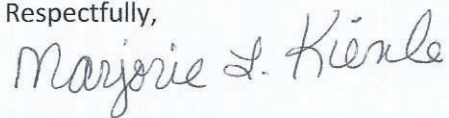


We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and appreciate being included as a Consulting Party. Our participation will be important to a successful resolution.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and to participate in this process. We look forward to hearing from you.

Respectfully,



Marjorie L Kienle

Consulting Party for HUNI

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)



May 5, 2022

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

Dear Ms. Konicki,

Southeast Neighborhood Development Inc writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

SEND is a non-profit community development corporation created by residents to revitalize the near southeast side of Indianapolis and to enhance the quality of life of its diverse spectrum of residents. SEND accomplishes this mission through creating, maintaining and sustaining quality [affordable housing](#), [economic development](#), and [community building](#).

Some possible concerns:

1. Widening the Hanna Avenue bridge without accommodating latent pedestrian/bicycle demand from east of the Interstate to the University of Indianapolis on Hanna Avenue.
2. Unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks about their assessment.
3. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to my historic district and home.]

We have a demonstrated interest because SEND serves as the community development corporation for a number of affected properties and residents. We request to participate as a consulting party. Our participation will be important to a successful resolution.




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May 5, 2022

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Dear Ms. Konicki,

We are writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

We are the Holy Cross Neighborhood Association—representing the residents, property owners, and businesses who call this neighborhood home. The I-65/I-70 North Split travels directly through our neighborhood and given the recent North Split construction, our members are acutely aware like never before of the impact made to this neighborhood—and others like it—by the mere presence of the interstate.

We hope that additional construction can do a better job at minimizing the adverse impact to communities, non-highway traffic, and non-motorists. Specifically, our concerns include issues like:

1. What is the impact of additional travel lanes on sidewalks, trails, underpasses, and other non-motorist use of either ROW space, bridges, or both? We'd like to hear from groups like Indy Parks and the Indy DPW.
2. The letter mentions *noise* as a byproduct worth studying (with which we agree), but INDOT should consider the effect of the noise barriers themselves. Plus, additional traffic can bring pollution, faster speeds, and other repercussions not identified.
3. The letter makes clear that this is truly about motorist convenience, rather than pavement condition. And not even all day, at present. What is the projected LOS gain? What if the pavement studies reveal that the pavement has a long, useful life?

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution. We also support the comments made in a separate letter from Rethink Coalition. Please consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Best regards,

A handwritten signature in black ink that reads "Scotty Z. Wilson". The signature is fluid and cursive, with a long horizontal line extending to the right.

Scotty Z. Wilson  
President



May 5th, 2022

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

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

Dear Ms. Konicki,

The Old Southside Neighborhood Association (OSNA) is writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

The OSNA's board has all members living in the Old Southside Neighborhood. We are active in our community and want to improve our neighborhood in continuing to become a safe and desirable place for neighbors to live. We are committed to promoting and supporting a diverse and positive quality of life. We strive to work with other civic and governmental organizations to achieve the best mutually beneficial outcomes to achieve these goals.

Some possible concerns:

1. Unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks about their assessment.
2. Added travel lanes and bridge widening that move interstate pollution and particulates and noise impacts closer to my historic district and homes. We have several neighbors that will be directly affected and want to ensure that their quality of living is not negatively impacted.

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

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*Melissa Brown*

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

Dear Ms. Konicki,

We are writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. Southeast Community Services is concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

Southeast Community Services has seen the impact of the original highway construction on the neighborhoods we serve. Our catchment area spans from Washington Street to the north, Post Road to the east, the I65 Corridor to the west and Thompson Road to the south. Many of the neighborhoods we currently serve will see dramatic impact to properties and businesses as the redevelopment continues.

1. Widening the Hanna Avenue bridge without accommodating latent pedestrian/bicycle demand from east of the Interstate to the University of Indianapolis on Hanna Avenue.
2. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to vulnerable families who cannot afford to move housing.

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink that reads 'Peggy Frame'.

Peggy Frame  
Executive Director  
Southeast Community Services  
[PeggyF@southeastindy.org](mailto:PeggyF@southeastindy.org) / 317-510-0223

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)

901 Shelby Street, Indianapolis, IN 46203. PHONE: 317-236-7400 WEB: [www.southeastindy.org](http://www.southeastindy.org)

# Make Words Go

Content & Marketing Strategy for Architects & Engineers

May 5, 2022

Leah J. Konicki  
Principal Investigator | Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
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,

My name is Dawn Olsen, and I am writing in response to INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. I am interested in the project because I'm a longtime resident of Fletcher Place and own a small business there. (It's called Make Words Go; I launched it more than two years ago.) I am also the immediate past president of the Fletcher Place Neighborhood Association (FPNA), the secretary for the Fountain Fletcher District Association (FFDA), and a member of the Southeast Community Services (SECS) Community Building Team. (We're working on an updated Quality of Life Plan.) I also serve on the Indianapolis Cultural Trail Young Professionals Board and am currently working with Southeast Neighborhood Development (SEND) on their 2022-2025 strategic plan. You could say I'm involved.

With that said, I am concerned that the safety and efficiency project might have a negative impact on southeast neighborhoods, some of the oldest in Indianapolis. I believe reasonable alternatives should be presented and seriously considered before the project shifts into fifth gear. This will help me have a better understanding of the long-term effects this project will have on the environment and the vitality and the general quality of life in this part of the city. As mentioned, Fletcher Place is one of the oldest neighborhoods in Indianapolis. Its namesake, Calvin Fletcher, settled here in the late 1830s, and immigrants from Ireland, Germany, Italy, and other European nations started arriving in the 1850s. We were a thriving, vibrant community, and the area was close-knit and blue-collar—until the 1968 construction of I-65/70 permanently isolated Fletcher Place, Bates-Hendricks, Fountain Square, and North Square from each other.

I am concerned that this project could create even larger gaps between Fletcher Place and other neighborhoods. That, like the project fifty years ago, residents will be displaced. I'd like to have a better understanding of how this project will affect the trail system, including the Indianapolis Cultural Trail, Pogue's Run Greenway, and Pleasant Run Greenway. Will this project accommodate for increased demand for trails, including ones that connect to the University of Indianapolis? How does it affect the Trail's plans to extend southward? (The Cultural Trail directly passes through Fletcher Place, North Square, Fountain Square, and Bates-Hendricks.) Would it be possible to include the Trail and Indy Parks in discussions? I'm also interested in learning how additional travel lanes and widened bridges will affect the southeast side in terms of Interstate and noise pollution and particulates. This applies to both the extended auxiliary lane and the Hanna Avenue bridge. Will the latter accommodate pedestrian and bicycle traffic from east of the Interstate to the University of Indianapolis?

Getting back to Fletcher Place – I want to ensure the safety and comfort of residents, as well as small business owners like myself. Bosphorus Istanbul Cafe, Chilly Water, and Hotel Tango are, literally, across the street from the Interstate. No matter how this project proceeds, I want these businesses to survive and thrive. Same for residential and mixed-use buildings like 748 E. Bates St., the Switchyard Place condos, the Union Laundry Lofts, the Hinge, and the Horace Mann condos on Buchanan & Noble streets.

I have a demonstrated interest in the I-65 Safety and Efficiency Project due to my legal and economic connections. I would like to participate as a consulting party, as my participation as a small business owner and neighborhood representative will be important in finding a successful resolution. I also want to voice my support for the comments the Rethink Coalition is providing in a separate letter. Please consider this my endorsement of the Rethink Coalition's letter.

I appreciate the opportunity to provide comments and participate in this process.

Thank you,

A handwritten signature in black ink that reads "Dawn Olsen". The signature is written in a cursive, flowing style.

**Dawn Olsen**

**dawn@makewordsgo.com**

**712.242.5638**

Owner | Make Words Go

Past President | Fletcher Place Neighborhood Association (FPNA)

Secretary | Fountain Fletcher District Association (FFDA)

Member | Southeast Community Services Community Building Team (SECS CBT)

Member | Indianapolis Cultural Trail Young Professionals Group

**cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)**





## Fletcher Place Neighborhood Association | Consulting Party Request

May 5, 2022

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

We are writing in response to INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

The Fletcher Place Historic District and the Holy Rosary Danish Church Historic District (a/k/a Fletcher Place II) Virginia Avenue serves as the border between two nationally registered historic districts. Fletcher Place is a caring community, full of hospitality, civic-minded businesses, a walkable neighborhood with beautifully preserved historic homes; with neighbors who care about each other.

This project would have an unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks regarding their assessment. The addition of travel lanes and bridge widening will move and increase interstate pollution, particulates and noise which will have grave impacts to our historic district and homes, not to mention the health of our residents.

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We Look forward to hearing from you.


Allissa Impink, Co - President [allissamo@gmail.com](mailto:allissamo@gmail.com)

Authentisign  
**Allissa Impink** 05/05/2022  
5/5/2022 5:13:22 PM EDT

Andrea Watts, Co- President [watts.andrea@gmail.com](mailto:watts.andrea@gmail.com)

Authentisign  
**Andrea Watts** 05/06/2022  
5/6/2022 5:04:00 AM EDT


Sarah Savage, Treasurer, [savsarah@gmail.com](mailto:savsarah@gmail.com)

Authentisign  
 05/06/2022  
5/6/2022 9:09:25 AM EDT


Joel Aguilar, Board Member, [agui320@gmail.com](mailto:agui320@gmail.com)

Authentisign  
**Joel Aguilar** 05/06/2022  
5/6/2022 9:14:19 AM EDT

Rauf Khalid, Board Member, [rjkr850v@gmail.com](mailto:rjkr850v@gmail.com)

Authentisign  
 05/06/2022  
5/6/2022 11:03:25 AM EDT

Julie Miller, Board Member, [j3fisher@hotmail.com](mailto:j3fisher@hotmail.com)

Authentisign  
 05/06/2022  
5/6/2022 11:17:53 AM EDT

Fern Bachner, Board Member, [fernbachner@gmail.com](mailto:fernbachner@gmail.com)

Authentisign  
**Fern Bachner** 05/06/2022  
5/6/2022 11:51:39 AM EDT

John Willey, Board Member, [john.willey@19thstarstatesolutions.com](mailto:john.willey@19thstarstatesolutions.com)

Authentisign  
 05/06/2022  
5/6/2022 11:53:53 AM EDT

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)

May 5, 2022

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

We are writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

The Greater Virginia Avenue Corridor Economic Improvement District (GVAC EID), authorized by the Indianapolis City County Council in 2018, exists to develop, enhance, and maintain commercial areas in the Fountain Square, Fletcher Place and Holy Rosary neighborhoods along Virginia Avenue, Prospect & Shelby Streets, all of which are impacted by this proposed work. Concerns include:

1. Widening the Hanna Avenue bridge without accommodating latent pedestrian/bicycle demand from east of the Interstate to the University of Indianapolis on Hanna Avenue.
2. Unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks about their assessment.
3. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to my historic district and home.]

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution. We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Sincerely,



Nick Baxter  
Co-Chair, GVAC EID

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)

May 6, 2022

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

The North Square Neighborhood Association (NSNA) is writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. NSNA is concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

NSNA is a registered City of Indianapolis neighborhood bounded by the I-65/70 highway to the west, Fletcher Avenue to the north, Shelby Street to the east, Woodlawn Avenue to the southeast, and Virginia Avenue to the southwest. We are very concerned with the single lane of the project that goes adjacent to our western boundary. We are adjacent to the Fountain Square Commercial District, which is protected both on the National Register of Historic Places and locally under the Indianapolis Historic Preservation Commission, and collaborate with their related business association, the Fountain Square Merchants Association (soon to be Fountain-Fletcher District) on neighborhood projects.

We are concerned with the following aspects of this project proposal:

1. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to historic districts and homes.
2. The lack of a Systems Analysis to support why and how lanes are to be added.
3. Unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks about their assessment.
4. Widening the Hanna Avenue bridge without accommodating latent pedestrian/bicycle demand from east of the Interstate to the University of Indianapolis on Hanna Avenue.
5. The widening of the Morris Street and Prospect Street bridges to accommodate added travel lanes and the further impacts that will have on loss of connectivity for the Bates Hendricks neighborhood.
6. The connection of the North Split and South Split and how that impacts the residents and businesses that are located beside or near the highway. Specifically, how does that northern lane spur into the South Split impact the future design considerations of the

South Split. We need to know if any component of this project would be a future encumbrance to the South Split.

NSNA has a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Thanks,

Jordan Ryan, President  
North Square Neighborhood Association  
[northsquarena@gmail.com](mailto:northsquarena@gmail.com)



cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)



May 6, 2022

Leah Konicki  
Principal Investigator - Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
via email to: [lkonicki@ascgroup.net](mailto: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. 14000073] 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](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:

Brenda Freije, [bfreije@rethink65-70.org](mailto:bfreije@rethink65-70.org), (317) 850-0141  
Russell Menyhart, [rmenyhart@taftlaw.com](mailto:rmenyhart@taftlaw.com), (202) 997-0681  
Charlie Richardson, [crichardson@faegredrinker.com](mailto:crichardson@faegredrinker.com), (317) 459-7260  
Kevin Osburn, [kosburn@reasite.com](mailto:kosburn@reasite.com), (317) 319-8585  
Meg Storrow, [storrow@storrowkinsella.com](mailto:storrow@storrowkinsella.com), (317) 697-5250

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  
Adairius Gardner  
Lourenzo Giple  
Sarah Hempstead  
Taylor Hughes  
Marjorie Kienle  
Stacia Murphy  
Kevin Osburn  
Jefferson Shreve

**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.



**From:** [Tom Beck](#)  
**To:** [Leah Konicki](#)  
**Cc:** [flintlowell@hotmail.com](mailto:flintlowell@hotmail.com)  
**Subject:** INDOT "South Split" consulting party  
**Date:** Friday, May 6, 2022 9:41:45 PM

---

Dear Leah:

Please add my name - Tom Beck - to the consulting party / public input list for the INDOT South Split planning study and construction alternatives analysis process.

I am a resident of the Garfield Park Neighborhood and am very interested in the planning / alternatives analysis work that will be undertaken for the interstate highway segment that runs immediately adjacent to our neighborhood.

I am very interested in seeing alternatives analyzed that will consider ways to design the new South Split area with strong consideration of ways to reconnect the Fletcher Place and Fountain Square neighborhoods - which were ripped apart approximately 50 years ago by the construction of the interstate through the middle of these neighborhoods.

Ways to help compensate for the damage done by building the interstate through these neighborhoods would include - shortening the width of the interstate between these two neighborhoods and working with the City of Indianapolis to design, build and help pay for new roadway bridges (Virginia Avenue and McCarty / Calvary Streets) designed with wider decks to allow one story building structures to be built on the bridges - adjacent to the roadway - with the goal of filling the buildings with commercial uses on these new bridges built over the interstate. This would help with reconnecting the bisected commercial corridors that were decimated by the original interstate construction and would help improve neighborhood walkability and connectivity in the southeast area of downtown Indianapolis.

My name, address, phone number and e-mail address are as follows:

Tom Beck  
1026 Hervey Street  
Indianapolis, IN 46203  
317-504-3717  
[tjbindy62@gmail.com](mailto:tjbindy62@gmail.com)

Please confirm my inclusion in your list of "consulting party" members by sending me a confirming e-mail, phone call or text message.

I found the information about participating in this study by reading the article in the May edition of the Urban Times monthly newspaper. I look forward to participating in this important planning study. Thank you.

Sincerely,

Tom Beck  
Garfield Park Neighborhood

Sent from my iPhone

**From:** [Brian Payne](#)  
**To:** [Leah Konicki](#)  
**Cc:** [info@rethink65-70.org](mailto:info@rethink65-70.org)  
**Subject:** Our request to be a consulting party  
**Date:** Sunday, May 8, 2022 2:39:46 PM  
**Attachments:** [image001.png](#)

---

May 8,

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

We at The Indianapolis Foundation and Central Indiana Community Foundation (CICF) are writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

The Indianapolis Foundation and CICF are committed to quality of life and health through quality of place. We also care deeply about helping to amplify the voices and agency of lower-income residents and neighborhoods who have always been underrepresented at the tables of power and decision-making.

CICF, through its Connected Communities initiative, is also partnering with the City of Indianapolis in building over \$60 million of new bicycle and pedestrian trails and connections throughout the City.

Here are our top three concerns:

1. Widening the Hanna Avenue bridge without accommodating latent pedestrian/bicycle demand from east of the Interstate to the University of Indianapolis on Hanna Avenue.
2. Unknown impact on the trail systems listed in your letter. We believe more detail is needed and we would like to hear from Indy Parks about their assessment.

3. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise closer to residents and neighborhoods.

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party. Our participation will be important to a successful resolution.

CICF is also one of the organizations that has the Rethink Coalition as a legal supporting organization with us through our status as a public charity. We support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please also consider this as our endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Sincerely,  
Brian Payne  
[brianp@cicf.org](mailto:brianp@cicf.org)

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)

Brian Payne  
he/him/his  
President and CEO  
Central Indiana Community Foundation  
615 N. Alabama St., Suite 300  
Indianapolis, IN 46204  
317-634-2423, ext. 177  
[brianp@cicf.org](mailto:brianp@cicf.org)  
Inspiring Philanthropy





**MASS AVE CULTURAL ARTS DISTRICT INC**  
**MASS AVE MERCHANTS ASSOCIATION INC**

May 8, 2022

Leah J. Konicki, Principal Investigator – Architectural Historian  
ASC Group, Inc., 9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

We are writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. We are concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented. Please add us to the Consulting Party roster for this project.

The Mass Ave Cultural Arts District serves to support and sustain an urban, vibrantly equitable, diverse, and inclusive cultural arts and business community around Mass Ave in the NE quad of downtown Indianapolis.

The Mass Ave Cultural Arts District and Mass Ave Merchants Association is concerned about:

1. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to historic districts and homes.
2. The connection of the North Split and South Split and how that impacts the residents and businesses that are located beside or near the highway along the east side of Indianapolis.
3. The lack of a Systems Analysis to support why and how lanes are to be added.

The Mass Ave Cultural Arts District & Mass Ave Merchants Association, composed of three national register and locally designated historic districts, is adjacent to I-65 and will be impacted by traffic induced by the proposed I-65 capacity expansion.

Thank you for this opportunity to provide comments and to participate in this process. We look forward to hearing from you.

Sincerely,  
MASS AVE CULTURAL ARTS DISTRICT & MASS AVE MERCHANTS ASSOCIATION

*Meg Storrow*

Meg Storrow, Board Chair  
317-697-5250 | [storrow@storrowkinsella.com](mailto:storrow@storrowkinsella.com)

May 8, 2022

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

I am writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. I am concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

I am the managing partner of School 9, LLC which owns the 100+ year old Clemens Vonnegut Public School No. 9, 407 Fulton Street, which sits immediately next to I-65/I-70 on the edge of the Lockerbie Square historic district. Today, School 9 is a multi-tenant office building serving local and national companies as tenants.

We are very concerned about the described "improvements" to the stretch of I-65 that leads into the I-65/I-70 South Split and how they will impact the Inner Loop, the historic neighborhoods, buildings adjacent to the Inner Loop, and the long-term plans to reconstruct the Inner Loop in a more environmentally sound design which will also better protect historic neighborhoods and individual historic structures.

The proposed addition of travel lanes and bridge widening will only increase pressure on overall quality of life and ability to sustainably do business in downtown Indianapolis. These "improvements" will move more interstate pollution, particulates, and noise impacts closer to School 9's historic district and business. We are also concerned about the unknown impact the "improvements" will have on the growing and successful trail system in and around downtown Indianapolis as such impacts could have a direct adverse effect on the value of School 9 and the viability of School 9 tenants' businesses. More information is needed about how the "improvements" will affect the trail system and how Indy Parks views these impacts.

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as School 9, LLC's endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Sincerely,

Paul J. Knapp  
Managing Partner  
School 9, LLC  
407 Fulton Street  
Indianapolis, IN 46202  
pknapp@yandlcom

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)



317 / 264 / 8000 407 FULTON STREET  
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May 8, 2022

By Email Delivery: [lkonicki@ascgroup.net](mailto:lkonicki@ascgroup.net)

Leah J. Konicki  
Principal Investigator – Architectural Historian  
ASC Group, Inc.  
9376 Castlegate Drive  
Indianapolis, IN 46256  
[lkonicki@ascgroup.net](mailto: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,

I am writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. I am concerned that the Project will have multiple environmental and other effects and that reasonable alternatives should be presented.

I am the President & CEO of Young & Laramore, the primary tenant of School No. 9, 407 Fulton Street, which sits immediately next to I-65/I-70 on the edge of the Lockerbie Square historic district. Our company has been in School No. 9 since 2006 and have a significant interest in the outcomes of this project.

We are very concerned about the described "improvements" to the stretch of I-65 that leads into the I-65/I-70 South Split and how they will impact the Inner Loop, the historic neighborhoods, buildings adjacent to the Inner Loop, and the long-term plans to reconstruct the Inner Loop in a more environmentally sound design which will also better protect historic neighborhoods and individual historic structures.

The proposed addition of travel lanes and bridge widening will only increase pressure on overall quality of life and ability to sustainably do business in downtown Indianapolis. These "improvements" will move more interstate pollution, particulates, and noise impacts closer to School 9's historic district and business. We are also concerned about the unknown impact the "improvements" will have on the growing and successful trail system in and around downtown Indianapolis as such impacts could have a direct adverse effect on the value of School 9 and the viability of School 9 tenants' businesses. More information is needed about how the "improvements" will affect the trail system and how Indy Parks views these impacts.

We have a demonstrated interest due to our legal and economic relation to the Project and its affected properties and would like to participate as a Consulting Party.

We also support the comments Rethink Coalition is providing in a separate letter from Rethink Coalition. Please consider this as Young & Laramore's endorsement of Rethink Coalition's letter.

Thank you for this opportunity to provide comments and participate in this process. We look forward to hearing from you.

Sincerely,

Thomas J. Denari  
President & CEO  
Young & Laramore  
407 Fulton Street  
Indianapolis, IN 46202  
[tdenari@yandl.com](mailto:tdenari@yandl.com)

cc: Rethink Coalition Board of Directors, [info@rethink65-70.org](mailto:info@rethink65-70.org)

**From:** [Ashley Simmons](#)  
**To:** [Leah Konicki](#)  
**Subject:** FHWA Project: I-65 Safety and Efficiency Project, ECL, Indianapolis, Marion County, Indiana (Des. No. 1400073, et. al)  
**Date:** Monday, May 9, 2022 11:43:53 AM

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Dear Ms. Konicki,

My name is Ashley Simmons and I am writing in response to the INDOT's April 8 letter announcing the I-65 Safety and Efficiency Project. As a resident of Fountain Square Alliance—a neighborhood that will be directly impacted by this project—I am concerned that the project will have multiple environmental, safety, historical and other effects on my neighborhood and the community at-large.

Because of this (along with concerns from other residents and organizations), reasonable alternatives should be presented and considered. Three of the impacted bridges are all within the boundaries of my neighborhood and my home is close to one of them. Here are some specific concerns that I have:

1. More transparency and studies shared around this project, particularly as it relates to, "heavy congestion during peak travel hours" —**when were these studies completed? Was this prior to COVID-19?** The pandemic has significantly altered travel, which will likely be permanent due to more people working from home. I personally travel this stretch of interstate at all hours due to the proximity to my home and I have not experienced the mentioned congestion at peak times in the last 2+ years.
2. Added travel lanes and bridge widening that move interstate pollution, particulates, and noise impacts closer to my historic district and home (built in 1922).
3. Being further disconnected from surrounding neighbors and community resources.
4. Widening the bridges without accommodating for pedestrian/bicycle traffic
5. Unknown impact on the trail systems, Pleasant Run Parkway Trail runs past my home, more detail is needed and trails should be assessed prior to finalizing plans

I have a demonstrated interest due to economic relation to the project and its affected properties and would like to participate as a Consulting Party. As a community member whose home will be affected, my participation will be important to a successful resolution. I also support the study that was conducted and the work being done by the Rethink Coalition .

Thank you for this opportunity to provide comments and participate in this process. I look forward to hearing from you.

Sincerely,  
Ashley

Ashley Simmons (she/her)  
765.491.8363



**From:** [Gibble, Austin](#)  
**To:** [Leah Konicki](#)  
**Subject:** FHWA Project I-65 Des. No. 1400073  
**Date:** Friday, May 13, 2022 10:38:21 AM  
**Importance:** High

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Good afternoon, Leah.

You may not remember me, but we've had interactions in the past during my prior role at IndyGo. Currently, I'm the Long-Range Transportation Planning Administrator for the City of Indianapolis. Unfortunately, it appears I was not included on the initial coordination letter for the I-65 South project that will primarily impact Marion County and some of our most vulnerable neighborhoods. Additionally, this work will fall within the overlay zone of two of our rapid transit lines, the Red Line (already operational) and the Blue Line (scheduled to be open in 2026). There is no mention of either of these lines within the NEPA coordination letter, nor is there any mention of the extensive zoning and land use reforms that the City has undertaken in the form of a new zoning overlay (in which a significant portion of this project falls).

Given the recent work around the North Split and the historical nature of highway construction in the State of Indiana, this project will require careful and constant coordination. **Please ensure that I am included in all coordination meetings and correspondence from here on out ([Austin.Gibble@indy.gov](mailto:Austin.Gibble@indy.gov)).**

Furthermore, I would like to have a briefing with INDOT staff on the project, its intended design, long-range transportation plans for the City, communities of concern, and so on. Could this be arranged? These are my primary questions/concerns at this time...

- What is the anticipated impact on adjacent properties?
- What, if any, will be the impact to current transit operations?
- Is INDOT considering long-term transportation demand management facilities, such as HOV lanes?
- Has there been any further analysis of traffic volume since 2012-2015? Particularly in recent months as we start to come out of the pandemic.
- What, if any, will be the impact to the Blue Line? It has already been held once for the construction of the North Split.
- What proposals is INDOT including to enhance the overall urban environment and mitigate the legacies of past decisions on the surrounding populous?
- What is INDOT proposing to enhance the pedestrian experience below overpasses and above underpasses?
- Debris and trash from passing motorists (throwing things out their windows) makes its way to the neighborhoods below; it's rare for there to not be accumulations of garbage along INDOT row in urban neighborhoods. What is INDOT's plan to contain, collect, and dispose of waste from facility users?

Thank you.

**Austin Gibble | Administrator of Long-Range Transportation Planning**

*(he/him/his)*

Department of Metropolitan Development | City of Indianapolis

[Austin.Gibble@indy.gov](mailto:Austin.Gibble@indy.gov) | [indy.gov/DMD](http://indy.gov/DMD)