

APPENDIX A: COMPLETED FHWA PEL QUESTIONNAIRE

Federal Highway Administration

Planning & Environment Linkages Questionnaire¹

ProPEL Indy Planning and Environment Linkages (PEL) Study Report

This questionnaire is intended to act as a summary of the planning and environment linkage (PEL) process and ease the transition from planning to a National Environmental Policy Act (NEPA) analysis. This questionnaire is consistent with the 23 CFR 450 (Planning regulations) and other FHWA policy on PEL process.

1. Background:

a. Who is the sponsor of the PEL study? (state DOT, Local Agency, Other)

The Indiana Department of Transportation (INDOT), in cooperation with the Federal Highway Administration (FHWA).

b. What is the name of the PEL study document and other identifying project information (e.g. sub-account or STIP numbers, long-range plan, or transportation improvement program years)?

The *ProPEL Indy Planning and Environment Linkages (PEL) Study Report* documents the PEL study process. During the study, the following documents were prepared to inform and develop the PEL Study Report and are included as appendices:

- Appendix B: *ProPEL Indy Summary of Previous Studies*
- Appendix C: *ProPEL Indy Final Environmental Constraints Report*
- Appendix D: *ProPEL Indy Existing Transportation Conditions Report*
- Appendix E: *ProPEL Indy Final Purpose and Need Report*
- Appendix F: *ProPEL Indy Final Universe of Concepts Report*
- Appendix G: *ProPEL Indy Final Alternatives Identification and Screening Report*
- *ProPEL Indy Resource Agency, Stakeholder & Public Involvement (RASPI) Summary Reports*
 - Appendix H: *RASPI Summary #1*
 - Appendix I: *RASPI Summary #2*
 - Appendix J: *RASPI Summary #3*
 - Appendix K: *RASPI Summary #4*

The documents listed above are included as appendices to the PEL Study Report and are available on the INDOT study website (<https://propelindy.com/>).

The ProPEL Indy study was included in the 2024-2027 Indianapolis Metropolitan Planning Organization (IMPO) Indianapolis Regional Transportation Improvement Program (IRTIP) as Des. No. 2201129 (listed as “Planning and Feasibility Corridor Study within the I-465 Loop”). The 2024-2027 IMPO IRTIP was directly incorporated into the 2024-2028 Statewide Transportation Improvement Program (STIP). The study is not included in the 2026-2029 IMPO IRTIP or the 2026-2029 STIP.

c. Who was included on the study team (Name and title of agency representatives, consultants, etc.)?

INDOT Central Office

Sandra Flum – Project Manager
Jonathan Wallace – Deputy Project Manager
Roy Nunnally – Director of Technical Planning & Programming
Alison Shaner – Transportation Planner and Modeler
Dan McCoy, PE – Director of Traffic Engineering
Nathan Shellhamer, PE – Manager, Traffic and Mobility Office
Laura Hilden – Director of Environmental Services
Corey Webb – Environmental Policy Manager

¹ https://www.environment.fhwa.dot.gov/env_initiatives/pel/pel_quest.aspx, Updated April 5, 2011

FHWA Indiana

Erica Tait – Interim Deputy Division Administrator
Paige Story – Community Planner
Jay DuMontelle – Project Delivery Team Leader
Ting Nahrwold – Senior Transportation Engineer

HNTB Corporation

Tim Miller – Study Manager
Ryan Huebschman, PE – Transportation Planning Lead
Kym Caird, PE – Engineering Lead
Jason Rhoades – Engineering Advisor
Kia Gillette – Environmental Lead
Lisa Wall – Communications Lead

d. Provide a description of the existing transportation facility within the corridor, including project limits, modes, functional classification, number of lanes, shoulder width, access control and type of surrounding environment (urban vs. rural, residential vs. commercial, etc.)

The ProPEL Indy study area includes approximately 11 miles of I-65, 14 miles of I-70, and one mile where I-65 and I-70 overlap. The study area is broken into four “spokes” as described below.

- **65 Spoke** – From the I-465/I-65 interchange on the northwest side to the 21st Street interchange.
- **65/70 Downtown Spoke** – I-65 from the 21st Street interchange south to Alabama Street (west end of North Split project), I-65/I-70 from Washington Street (south end of North Split project) south to the South Split interchange, and I-70 from just west of the West Street interchange east to the South Split interchange.
- **70 West (W) Spoke** – From the I-465/I-70 interchange on the west side to just west of the West Street interchange.
- **70 East (E) Spoke** – From just west of the Keystone Avenue/Rural Street interchange (east end of North Split project) to the I-465/I-70 interchange on the east side.

The study area includes I-65 and I-70 within the study limits described above and local road segments and intersections that directly influence or are influenced by the interstates.

The study limits extend slightly beyond I-465 and the I-65/I-70 South Split interchange to consider the potential influence of those system interchanges. Otherwise, two federally funded projects recently constructed (I-65/I-70 North Split) or in construction (I-65 Safety and Efficiency) are largely excluded from the study limits.

I-65 and I-70 are classified as interstate roadways. Both roadways are part of the National Highway System (NHS) and the National Truck Network (NTN). The crossroads that intersect with I-65 and I-70 within the study area have varying classifications of roadways. There are a total of 20 interchanges within the study area. Six of these are system interchanges, which provide connections between two or more interstates. The remaining 14 are service interchanges, which provide connections between the interstates and lower classifications of roads.

The typical sections of each spoke vary and are described below.

- **65 Spoke** – I-65 within the 65 Spoke is primarily a six-lane urban highway with paved shoulders and directions of travel separated by a concrete barrier wall. A collector-distributor lanes system parallels I-65 in each direction at the I-65/38th Street/Kessler Boulevard interchange.
- **65/70 Downtown Spoke** – The section of I-65/I-70 between the I-65/I-70 South Junction and Washington Street is a depressed urban highway, with four lanes provided in the northbound

direction and three lanes plus a collector-distributor (C-D) system in the southbound direction. The lanes on the C-D system merge with the mainline before reaching Fletcher Avenue.

I-65 in the northern portion of the 65/70 Downtown Spoke has two distinct typical sections. I-65 is elevated on structure from the North Split interchange to West Street. This structure provides three lanes in each direction. North of West Street, I-65 is a six-lane urban highway with one auxiliary lane in each direction. This portion of I-65 is elevated on fill.

I-70 in the southern portion of the 65/70 Downtown Spoke is a six-lane urban highway from West Street to the South Split interchange. This portion of I-70 is elevated on fill.

- **70 West (W) Spoke** – I-70 within the 70 W spoke is primarily a six-lane urban highway with paved shoulders and directions of travel separated by a median barrier wall.
- **70 East (E) Spoke** – I-70 within the 70 E spoke is primarily an eight-lane urban highway with paved shoulders and directions of travel separated by a median barrier wall. A C-D lanes system parallels I-70 between the I-70/Shadeland Avenue and I-70/I-465 interchanges.

In general, the character of the corridor is urban, with varied land-uses, including residential, commercial, industrial, institutional, and mixed-uses.

e. Provide a brief chronology of the planning activities (PEL study) including the year(s) the studies were completed.

Study milestones and key planning activities include:

- Kickoff and Initial Public Involvement (May 2023 through January 2024)
- Visioning and Data Collection
 - Summary of Previous Studies (May 2024)
 - Existing Transportation Conditions Report (May 2024)
 - Environmental Constraints Report (May 2024)
- Purpose and Need
 - Purpose and Need Report (May 2024)
- Universe of Concepts
 - Universe of Concepts Screening Report (December 2024)
- Alternatives Evaluation
 - Alternatives Identification and Screening Report (September 2025)
- PEL Study Report (December 2025)

In addition to the planning activities and reports listed above, public involvement activities spanned the duration of the study.

f. Are there recent, current, or near future planning studies or projects in the vicinity? What is the relationship of this project to those studies/projects?

The 2026-2029 IMPO IRTIP details several committed improvements to the Indianapolis interstate system or cross streets that will be completed prior to the horizon year of 2050, regardless of the outcome of this study. It is possible some of the programmed projects may address short-term infrastructure condition needs. **Table 3** in the ProPEL Indy Report lists the programmed projects and if any of the study needs will be addressed.

2. Methodology used:

a. What was the scope of the PEL study and the reason for completing it?

The scope of and reason for completing the ProPEL Indy study was to identify a reasonable range of alternatives for the study area. The study included several objectives to achieve this outcome:

- Engage the public, study stakeholders, and resource agencies throughout the study.
- Identify community goals for the study area.
- Identify transportation needs within the study area.
- Develop the purpose and need for improvements in the study area.

- Identify and develop alternatives that meet the identified needs and consider community goals.
- Evaluate alternatives and eliminate unreasonable alternatives.
- Carry forward a smaller number of alternatives for further consideration in future planning and/or project development, including NEPA environmental reviews.
- Document the study process.

b. Did you use NEPA-like language? Why or why not?

Yes, NEPA-like language was used to ensure a smoother transition between the planning study and subsequent NEPA processes.

c. What were the actual terms used and how did you define them? (Provide examples or list)

The PEL study used the same terms that are used in NEPA, such as study area, purpose and need, range of reasonable alternatives, reasonable alternatives, environmental constraints, alternatives development and evaluation, alternatives screening, and No-Build alternative. The definitions of these terms were the same as the common understanding of the NEPA terms.

d. How do you see these terms being used in NEPA documents?

The terms used in this PEL study are consistent with terms commonly used in the NEPA process and are intended to make inclusion into future NEPA documents seamless. As a result, the planning products from the PEL study, which include NEPA terms, can be incorporated via reference to guide, inform, or shape future NEPA documents. Depending on the project scope and timing of advancement, this may require supplementing, refining, or reconfirming the information, analysis, and decisions from the PEL studies during the NEPA process.

e. What were the key steps and coordination points in the PEL decision-making process? Who were the decision-makers and who else participated in those key steps? For example, for the corridor vision, the decision was made by state DOT and the local agency, with buy-in from FHWA, the USACE, and USFWS and other resource/regulatory agencies.

The key steps in the PEL decision-making process included the following:

- Identifying existing conditions
- Determining the purpose and need for improvements in the study area
- Developing, evaluating, and screening improvement alternatives
- Identifying a reasonable range of alternatives to be carried forward for further evaluation in future planning, project development, and/or NEPA

The primary decision-makers participating in these key steps included INDOT and FHWA. INDOT and FHWA held regular coordination meetings throughout the duration of the PEL study, and FHWA was asked to review and provide feedback on all study documents. INDOT worked with the Indianapolis Metropolitan Planning Organization (IMPO) and the City of Indianapolis as significant stakeholders. In addition, INDOT solicited feedback from resource agencies and federally recognized tribes at each of these key decision points. The ProPEL Indy study team established four Stakeholder Advisory Committees (SAC), each representing one of the study's four pillars: Quality of Life, Economic Growth and Opportunity, Transportation and Mobility, and Transportation for All. Each committee included representatives from a broad collection of neighborhoods, businesses, and organizations.

See **Chapter 5** of the PEL Study Report for further information on the public involvement and agency coordination efforts.

f. How should the PEL information be presented in NEPA?

The information presented in this PEL study is intended to serve as a foundation for additional analysis and refinement during the NEPA phase. The information, analysis, and planning decisions from the PEL study will be presented as a transportation planning study intended to inform the NEPA review. The following

planning products from the PEL study may be appended to or incorporated by reference to guide, inform, or shape future NEPA documents:

- *ProPEL Indy Summary of Previous Studies*
- *ProPEL Indy Final Environmental Constraints Report*
- *ProPEL Indy Existing Transportation Conditions Report*
- *ProPEL Indy Final Purpose & Need Report*
- *ProPEL Indy Final Universe of Concepts Report*
- *ProPEL Indy Final Alternatives Identification and Screening Report*
- *ProPEL Indy PEL Study Report*

3. Agency coordination:

a. Provide a synopsis of coordination with Federal, tribal, state and local environmental, regulatory and resource agencies. Describe their level of participation and how you coordinated with them.

Coordination was completed with resource agencies and federally recognized tribes at three key steps in the ProPEL Indy study. Resource agencies and Tribes were sent the Draft Purpose and Need Report, Draft Universe of Concepts Report, and Draft Alternatives Identification and Screening Report to review and provide comments. Virtual resource agency meetings were held at the Purpose and Need and Alternatives Identification and Screening phases.

Table 1 below details the resource agencies and federally recognized tribes that were invited to participate in the PEL study, as well as the attendees of the two resource agency meetings.

Table 1. ProPEL Indy Resource Agency and Tribal Coordination

COORDINATION LIST	STAKEHOLDER TYPE		COORDINATION at STUDY MILESTONES				
	Resource Agency	Tribe	Purpose and Need		Universe of Concepts (Comments Received)	Alternatives Identification and Screening	
			Comments Received	Meeting Attendance (6/14/2024)		Comments Received	Meeting Attendance (9/25/2025)
National Park Service	X						✓
US Dept. of Housing & Urban Development	X						
US Fish & Wildlife Service	X					9/17/2025 ✓	
US Army Corps of Engineers	X						
Natural Resources Conservation Service	X						
US Environmental Protection Agency	X			✓			
US Coast Guard (8th District)	X						
IDEM, Groundwater Section	X		6/19/2024 ✓	✓			✓
IDEM, Wetlands & Stormwater	X						✓
IDNR, Div. Fish & Wildlife	X		5/20/2024 ✓	✓	12/11/2024 ✓	9/12/2025 ✓	✓
IDNR, Div. Outdoor Rec.	X						
INDOT, Office of Aviation	X					9/10/2025 ✓	
IDNR, Div. Historic Preservation and Archaeology	X		6/19/2024 ✓	✓	1/7/2025 ✓		✓
Indianapolis Historic Preservation Commission	X		5/22/2024 ✓				
Marion County Historian	X						
Marion County Historical Society	X						
Indiana Landmarks	X						
Marion County Surveyor's Office	X						
Marion County Construction and Business Services	X			✓			
Indy Parks and Recreation	X			✓			✓
Indianapolis Department of Business and Neighborhood Services	X						
Marion County Soil and Water Conservation District	X						
Delaware Nation of Oklahoma		X					
Eastern Shawnee Tribe of Oklahoma		X					
Miami Tribe of Oklahoma		X			8/19/2025 ✓		
Peoria Tribe of Indians of Oklahoma		X					
Pokagon Band of Potawatomi Indians		X					
Shawnee Tribe		X					
Turtle Mountain Band of Chippewa Indians		X					

b. What transportation agencies (e.g. for adjacent jurisdictions) did you coordinate with or were involved during the PEL study?

In addition to regular coordination with FHWA, the following transportation agencies or stakeholders were involved throughout the PEL study process:

- Boone County Highway Department
- Central Indiana Regional Transportation Authority (CIRTA)/Commuter Connect
- Hamilton County Highway Department
- Hancock County Highway Department
- Indiana Rail Road
- Indianapolis Airport Authority
- Indianapolis Department of Public Works
- Indianapolis Metropolitan Planning Organization
- IndyGo
- Johnson County Highway Department
- ReThink 65/70 Coalition
- Shelby County Highway Department

c. What steps will need to be taken with each agency during NEPA scoping?

Formal NEPA early agency coordination and scoping, including tribal coordination, will be needed to initiate the NEPA process and to help define the level of NEPA documentation and studies. Cooperating and participating agencies were not identified and invited during the PEL study, so that coordination will need to occur at the beginning of NEPA (as needed). If possible, current agency contacts will be preserved once NEPA is initiated to leverage previous knowledge and streamline the NEPA process.

4. Public coordination:

a. Provide a synopsis of your coordination efforts with the public and stakeholders.

The information below provides a high-level summary of the coordination efforts with the public and study stakeholders. More information on each discussion is provided in **Chapter 5** of the PEL Study and the RASPI Summaries (Appendices H, I, J, and K of the PEL Study Report).

Study Launch Events

In conjunction with the launch of ProPEL Indy, the study team participated in a series of engagement events to introduce the study to the community. Stakeholders were given the opportunity to meet the study team, learn details about ProPEL Indy and sign up for study updates. The study team coordinated and participated in a total of eight events held in May and June 2023.

Stakeholder Advisory Committee (SAC) Meetings

The ProPEL Indy study team established four Stakeholder Advisory Committees, each representing one of the study's four pillars: Quality of Life, Economic Growth and Opportunity, Transportation and Mobility, and Transportation for All. Each committee included representatives from a broad collection of neighborhoods, businesses, and organizations.

Four SAC meetings were held in line with the Visioning and Data Collection, Purpose and Need, Universe of Concepts, and Alternatives Identification and Screening phases of the study.

General Stakeholder Coordination

The ProPEL Indy study team identified and met with various stakeholder groups during the Visioning and Data Collection phase of the study. These groups included neighborhood associations within the study limits, local agencies, and community organizations. A total of 24 stakeholder meetings were conducted between June 2023 and January 2024. Eleven stakeholder meetings were held during the Purpose and Need phase between February and June 2024, 19 meetings were held during the Universe of Concepts phase

between July and December 2024, and 18 meetings were held during the Alternatives Identification and Screening phase between January and October 2025.

During the Purpose and Need phase, the ProPEL Indy study team began holding Neighborhood Office Hours to build awareness around the study, provide an opportunity for residents and stakeholders to engage with the study team, and receive public comments related to the study and study milestones. Between May and June 2024, the study team coordinated and staffed four Neighborhood Office Hours events at a variety of times and locations in the study area. During the Universe of Concepts phase, the ProPEL Indy study team held two Neighborhood Office Hours events in the study area in July and August 2024.

The ProPEL Indy study team identified and met with several Indianapolis businesses during the Visioning and Data Collection and Alternatives Identification and Screening Phases of the study. The purpose of these meetings was to introduce the ProPEL Indy Study, gain an understanding of each organization's current situation and future goals, share the alternatives, and provide the opportunity for each organization to share feedback and ask questions about the study.

In addition, the ProPEL Indy study team coordinated participation in 17 community events in the study area. The study team engaged with event attendees to share details about the ProPEL Indy study, encourage feedback and sign up for study updates.

Regular meetings were also held with the ReThink 65/70 Coalition during the study.

Traditional Media

The study team used traditional media channels and outlets to regularly communicate study milestones and events, such as publication of draft reports for public review and comment as well as announcements of public information meetings. This included publishing public notices in local newspapers such as the *IndyStar* and the *Indy Recorder*.

INDOT also issued media advisories and press releases to coincide with these events and milestones. Media briefings were held in conjunction with the release of the draft reports during the Purpose and Need, Universe of Concepts, and Alternatives Identification and Screening phases of the study.

Study Website

From the outset of the ProPEL Indy study, a dedicated study website was implemented and regularly updated to serve as a central hub for public engagement and information sharing. The website was designed to:

- Keep stakeholders and the public informed throughout the study process.
- Provide 24/7 access to relevant materials, allowing people to explore information on their own time.
- Host draft reports during public review periods.
- Enable study stakeholders and other interested individuals and groups to easily provide their feedback via an online comment form.
- Serve as the portal for virtual public information meetings, as well as hosting copies of content shared at in-person public information meetings.
- Feature interactive tools, including a mapping application and video content, to help users better understand the technical analyses, and how they informed the study's recommendations.

This approach helped the study team maintain transparency, encourage meaningful public input, and make complex information more accessible.

Social Media

Social media was used throughout the study process to help keep stakeholders engaged and informed. The social media efforts included Facebook, Instagram, and LinkedIn. Further information about social media efforts, including documentation of social media posts, is provided in the RASPI Summaries (Appendices H, I, J, and K of the PEL Study Report).

Targeted Outreach

The study team completed targeted outreach to ensure sensitive communities were engaged as part of the study process. The study team proactively reached out to neighborhoods along I-65 and I-70 to meet with them during their neighborhood meetings. This helped to ensure more inclusive engagement across the study area.

Postcard Mailings

The study team completed direct mailings of postcards to resident and business addresses in the study area during the Universe of Concepts phase. Approximately 18,000 postcards were distributed in December 2024. The postcards contained information such as instructions on how to access digital and hard copies of the *Draft ProPEL Indy Universe of Concepts Report* published for public review, as well as instructions for how to provide comments to the study team.

Public Information Meetings

The study team offered public information meetings in a variety of formats, including both in-person sessions and virtual or on-demand options to ensure broad accessibility. These meetings were organized around the study phases to allow feedback accordingly. For the ProPEL Indy study, these public information meetings were branded “Community Conversations.” No Community Conversations were held during the Universe of Concepts phase. Those held during the other study phases are detailed below. Meetings were live-streamed, recorded, and made available on the study website.

Visioning and Data Collection Phase

The first round of public information meetings occurred in July 2023 as part of the Visioning and Data Collection phase. During this phase, the study team held nine in-person meetings:

- July 6, 2023, at Decatur Township School for Excellence
- July 10, 2023, at Bosma Enterprises
- July 11, 2023, at IPL West Branch
- July 12, 2023, at Global Village Welcome Center
- July 13, 2023, at John Boner Neighborhood Center
- July 17, 2023, at Ivy Tech Conference Center
- July 19, 2023, at Far East Side Neighborhood Center
- July 20, 2023, at Martin University
- July 27, 2023, at INDOT Traffic Management Center

A virtual, on-demand meeting was also made available beginning July 28, until September 30, 2023.

Purpose and Need Phase

The second round of public information meetings occurred in June 2024 as part of the Purpose and Need phase of the study. During this phase, the study team held four in-person meetings:

- June 11, 2024, at Rhodius Park Family Center
- June 13, 2024, at Julia M. Carson Government Center
- June 18, 2024, at Martin University
- June 26, 2024, at Guion Creek Middle School

A virtual, on-demand meeting was also available beginning June 24, until June 30, 2024.

Alternatives Identification and Screening Phase

The third round of public information meetings occurred in September 2025 as part of the Alternatives Identification and Screening phase of the study. The study team held four in-person meetings:

- September 11, 2025, at John Boner Neighborhood Center
- September 15, 2025, at International District Community Center
- September 23, 2025, at Indianapolis Public Library West Branch
- September 25, 2025, at Ivy Tech Conference Center

5. Purpose and Need for the PEL study:

a. What was the scope of the PEL study and the reason for completing it?

A goal of the ProPEL Indy study was to identify the transportation issues and a reasonable range of alternatives for the study area. The study included several actions to achieve this goal:

- Engage the public, study stakeholders, and resource agencies throughout the study.
- Identify community goals for the study area.
- Identify transportation needs within the study area.
- Develop the purpose and need for improvements in the study area.
- Identify and develop alternatives that meet the identified needs and consider community goals.
- Evaluate alternatives and eliminate unreasonable alternatives.
- Carry forward alternatives for further consideration in future planning and/or NEPA.

b. Provide the purpose and need statement, or the corridor vision and transportation goals and objectives to realize that vision.

The following information is also provided in **Chapter 2** of the PEL Study Report.

Transportation Needs

The transportation needs identified for the ProPEL Indy study area include:

- Deteriorated bridge and pavement condition;
- Roadway safety;
- Roadway mobility; and,
- Limited multimodal and neighborhood connections.

Purpose

To address the needs identified above, the purpose of the ProPEL Indy study is to identify alternatives that:

- Improve bridge and pavement condition;
- Improve safety along the interstates by reducing the number and severity of crashes within the study area;
- Improve mobility by reducing congestion or eliminating geometric deficiencies that contribute to congestion; and,
- Improve multimodal connectivity across and near the interstates.

Given the size of the study area and the needs identified, the purpose and need statement was developed to support a range of potential improvement solutions. This could include spoke-wide improvements, as well as localized improvements that address the identified needs.

Community Goals

For the ProPEL Indy study, community goals were developed to reflect the values and priorities of people living and working in the corridor. Community goals represent overarching outcomes that are desirable, but not specifically required since they are not measurable with respect to identified study area needs. These goals are not the basis of eliminating or carrying forward PEL study alternatives. Community goals were identified primarily through public and stakeholder feedback and are grouped within the four study pillars:

Quality of Life and Livability, Economic Growth and Opportunity, Transportation and Mobility, and Transportation for All. The community goals identified are provided in **Table 2** below.

Table 2. ProPEL Indy Community Goals

Pillar	Community Goal
Quality of Life and Livability	Goal #1 - Identify community enhancements that improve the quality of life of adjacent neighborhoods. This could include improving or adding lighting; reducing visual, noise, and air pollution impacts; providing wayfinding and points of interest signage; landscaping; and considering placemaking opportunities.
	Goal #2 - Avoid and/or minimize impacts to the natural and human environment.
Economic Growth and Opportunity	Goal #1 - Provide transportation infrastructure to support local, regional, and statewide economic development goals.
	Goal #2 - Ensure efficient and reliable transportation to support the visitor experience, enhancing Indianapolis as a world-class destination for economic and cultural activities.
Transportation and Mobility	Goal #1 - Support emerging technologies and related infrastructure, such as electric and autonomous vehicles, and consider the role technology could play in incident management, speed enforcement, and emergency response.
	Goal #2 - Consider the Indianapolis MPO's Central Indiana Regional Resiliency Snapshot, and transportation goals in the Indianapolis THRIVE plan. This should include highly vulnerable transportation assets during alternative development.
Transportation for All	Goal #1 - Actively engage stakeholders who use, cross, work, or live near the interstates throughout the study to provide input into decision-making.
	Goal #2 - Provide accessible, fair, safe, affordable, reliable, and sustainable mobility along and across the interstates for community members based on identified needs and input received. This includes consideration of pedestrian, bicycle, transit, ride-hailing apps, or other modes of transportation.

c. What steps will need to be taken during the NEPA process to make this a project-level purpose and need statement?

The purpose and need statement developed for the ProPEL Indy study addresses the I-65 and I-70 study corridors within I-465 in Marion County. It was developed in a manner consistent with FHWA PEL guidance. Therefore, INDOT plans to incorporate portions of it by reference into future NEPA environmental reviews. The Existing Transportation Conditions Report was used to inform the purpose and need statement for this study and it may also be referenced to develop project specific purpose and need statements.

Depending on the specific project advancing into NEPA, the purpose and need statement may need to be refined or supplemented. It is possible that not all needs or purposes would apply to the interstate segment, interchange, grade separation, or intersection project being developed. It is also possible that as a project is developed, additional needs specific to the project limits are identified. Therefore, the initiation of any project should revisit the applicability of this purpose and need statement and should consider whether additional public and stakeholder engagement is necessary in that process.

6. Range of alternatives: Planning teams need to be cautious during the alternative screen process; alternative screening should focus on purpose and need/corridor vision, fatal flaw analysis, and possibly mode selection. This may help minimize problems during discussions with resource agencies. Alternatives that have fatal flaws or do not meet the purpose and need/corridor vision will not be considered reasonable alternatives, even if they reduce impacts to a particular resource. Detail the range of alternatives considered, screening criteria, and screening process, including:

a. **What types of alternatives were looked at? (Provide a one or two sentence summary and reference document.)**

The ProPEL Indy study used a two-step screening process to identify reasonable alternatives to address the identified transportation needs and goals of the study area.

Step 1: The *ProPEL Indy Universe of Concepts Report* documented the first step of the alternatives development and screening process. In this step, concepts that may address the transportation needs identified in the *ProPEL Indy Purpose and Need Report* were defined at a broad level of detail. These transportation improvement concepts were not location-specific and could potentially be implemented throughout the study limits. The concepts were reviewed to confirm their potential to meet study needs and determine if there were known fatal flaws. Concepts not satisfying screening criteria were eliminated. **Table 12** of the PEL Study Report lists the concepts and if they were advanced to the next level of screening.

Step 2: The *ProPEL Indy Alternatives Identification and Screening Report* documented the second step of the alternatives development and screening process. In this step, concepts from the *ProPEL Indy Universe of Concepts Report* were pieced together to form planning-level alternatives along each spoke. These alternatives were quantitatively and qualitatively evaluated based on their ability to meet the study purpose and need, environmental impacts, cost, constructability, and ability to meet community goals. **Section 4.3.1** of the PEL Study Report lists the alternatives identified for each spoke. **Section 4.3.2** lists the Planning Principles and Design Toolbox elements identified in the study.

b. **How did you select the screening criteria and screening process?**

The process used a two-step screening approach, from a high-level, qualitative assessment in Step 1 to a more detailed qualitative and quantitative in Step 2.

In Step 1, the Universe of Concepts, concepts were identified using input from previous studies, public and stakeholder feedback. These concepts were qualitatively evaluated against the study area purpose and need, as well as evaluated against fatal flaw screening criteria. Only concepts that met one or more needs and the passed fatal flaw screening were carried forward for further evaluation. Community goals were not used in the initial screening phase because an understanding of all locations and contexts was not fully established and concepts at this stage were high-level “building blocks,” not fully developed alternatives. Fourteen concepts from this initial screening were carried forward for further evaluation. See **Appendix F** of the PEL Study Report, *ProPEL Indy Final Universe of Concepts Report*, for additional information. Step 2 of the screening approach identified and developed alternatives for each of the study spokes using a three-step process:

- **Step 1:** Decision Trees – apply decision trees to both interstate segments and interchanges to identify concepts to address identified needs.
- **Step 2:** Alternatives Identification – Group the concepts into alternatives using the output from Step 1.
- **Step 3:** Alternative Development – Develop and refine conceptual layouts for each alternative.

Following the identification and development of the alternatives, they were evaluated on their ability to meet the study purpose and need, environmental impacts, costs, constructability, and ability to address community goals. The screening criteria were both qualitative and quantitative. Alternatives in each spoke were evaluated independently of improvements in other spokes where possible. See **Appendix G** of the PEL Study Report, *ProPEL Indy Final Alternatives Identification and Screening Report*, for additional information.

c. For alternative(s) that were screened out, briefly summarize the reasons for eliminating the alternative(s). (During the initial screenings, this generally will focus on fatal flaws.)

During the screening process, alternatives were eliminated if they did not meet at least one need or did not pass the fatal flaw analysis (Universe of Concepts). Fatal flaws included: not appropriate in scope and scale for the transportation problems identified, unacceptable safety or operational impacts, unacceptable socioeconomic or environmental impacts, or extraordinarily high cost. In Step 2 (Alternatives Identification and Screening), alternatives with limited benefits compared to impacts and costs were identified as unreasonable and eliminated from further consideration.

See **Chapter 4** of the PEL Study Report for further detail on the results of the alternative screening process. For a complete list of alternatives considered and reasons for elimination, see the alternatives screening reports in **Appendices F and G** of the PEL Study Report.

d. Which alternatives should be brought forward into NEPA and why?

The alternatives carried forward from the *ProPEL Indy Final Alternatives Identification and Screening Report*, which are listed in **Section 4.3.4** of the PEL Study Report, should be brought forward into subsequent NEPA and project development studies in the relevant planning spokes. These alternatives meet the study's purpose and need, support community goals, and may be considered reasonable based on the results of this planning study. Connectivity and placemaking opportunities along each spoke should be considered for any alternatives that move forward from this study.

Note that some alternatives may require further analysis in the future to determine if the tradeoffs between the potential benefits, impacts, and costs are a reasonable solution to the planning segment's transportation needs. Also, alternatives with construction or operations costs beyond INDOT's typical funding will require the funding gap be provided from other sources.

Depending on multiple factors, including statewide priorities and funding availability, alternatives considered as part of this PEL study could be combined in different ways in the future to address the identified transportation needs and support the goals of the study area.

e. Did the public, stakeholders, and agencies have an opportunity to comment during this process?

Yes. The public, stakeholders, and agencies had the opportunity to comment throughout the study process through a series of SAC meetings, public information meetings, Community Office Hour events, individual stakeholder meetings, resource agency meetings, stakeholder meetings, neighborhood meetings, and other public events (e.g., local events, fairs, and festivals). These individuals and groups could also submit comments on the ProPEL Indy study website at any point during the study. More than 1,800 comments were received from stakeholders over the course of the study.

See **Chapter 5** of the PEL Study Report for further information on the public involvement and agency coordination efforts.

f. Were there unresolved issues with the public, stakeholders, and/or agencies?

Chapter 6 of this report provides details regarding study elements or issues that require further consideration during development of any future projects in the study area. In summary, these topics include:

- Alternatives carried forward with construction or operations costs beyond INDOT's traditional funds are contingent on additional funding being identified by other sources.
- Connectivity and Placemaking Opportunities – Connectivity and placemaking opportunities should be evaluated for any project that moves forward from this study.
- A potential location for a signature bridge within the study limits could be identified in future studies or projects.

- Local Streets - Additional traffic studies and analysis of impacts to the local roadway network may also be needed if future improvements are proposed to restrict or change access to/from/across I-65 or I-70.
- Planning/Air Quality - Any alternatives that move forward will need to be coordinated with the IMPO so that they can be incorporated into the IMPO's MTP and IRTIP and INDOT's STIP. As a result, these alternatives should be consistent with and support the goals of the adopted MTP.
- The need to complete resource identification and impact assessment at a level appropriate for NEPA documentation.
- Agency Coordination – Coordination with agencies and Section 106 consulting parties will be completed to ensure that all potential impacts and procedural requirements are addressed.

7. Planning assumptions and analytical methods:

a. What is the forecast year used in the PEL study?

2050

b. What method was used for forecasting traffic volumes?

The ProPEL Indy PEL study used a combination of Highway Capacity Software (HCS) for freeway analysis, Synchro Software for intersection analysis, and VISSIM microsimulation models for detailed operational analysis. These tools were used to assess future traffic operations under the 2050 No-Build and Build conditions, allowing the study team to model congestion and weaving in complex segments of the corridor.

c. Are the planning assumptions and the corridor vision/purpose and need statement consistent with each other and with the long-range transportation plan? Are the assumptions still valid?

Yes, the planning assumptions and purpose and need statement in the ProPEL Indy study are consistent with one another and with the Indianapolis Metropolitan Planning Organization's Long-Range Transportation Plan (LRTP). The study draws directly from prior regional plans, stakeholder priorities, and projected growth trends to ensure alignment.

Specifically:

- The purpose and need focuses on improving pavement/bridge conditions, safety, mobility, and multimodal connectivity—core objectives also reflected in the LRTP.
- The corridor vision emphasizes transportation for all, economic opportunity, quality of life, and resiliency, which align with regional planning goals.
- Assumptions used in forecasting and analysis, such as traffic growth to the year 2050, travel demand, and system performance metrics, are derived from MPO data and modeling tools used in regional planning.

These assumptions remain valid for informing NEPA and project development going forward.

d. What were the future year policy and/or data assumptions used in the transportation planning process related to land use, economic development, transportation costs, and network expansion?

The ProPEL Indy study relied on several future-year policy and data assumptions related to land use, economic development, transportation costs, and network expansion:

- Travel demand models were based on the IMPO's travel demand model. The IMPO's 2020 base model was calibrated to reflect 2023 conditions.
- Land Use and Economic Development: Assumptions were informed by 45 previous land use and transportation planning documents from INDOT, IndyGo, the Indianapolis MPO (IMPO), and the City of Indianapolis. These plans reflect anticipated regional growth, redevelopment priorities, and economic development objectives that align with the corridor vision.
- Transportation Costs: Planning-level cost estimates were provided in 2025 dollars, with construction, operations, and maintenance costs based on historical data, engineering judgment,

- and INDOT Design Manual guidance. Inflation to year-of-expenditure costs was not included due to unknown project timelines.
- Network Expansion: The study incorporated committed transportation projects from the INDOT Statewide Transportation Improvement Program (STIP) and the Indianapolis Regional Transportation Improvement Program (IRTIP). These programmed projects are assumed to be completed before the 2050 horizon year and were treated as part of the future baseline network.
- Planning Consistency: The assumptions are consistent with the IMPO’s 2050 Metropolitan Transportation Plan and INDOT’s Long-Range Transportation Plan (2018–2045), which prioritize safety, mobility, system preservation, and economic vitality.

These assumptions ensured that the alternatives were evaluated in a realistic, policy-aligned future context.

8. Environmental resources (wetlands, cultural, etc.) reviewed. For each resource or group of resources reviewed, provide the following:

- In the PEL study, at what level of detail was the resource reviewed and what was the method of review?**
Environmental resources were reviewed at a planning-level of detail using desktop analysis and available GIS data. These sources were supplemented with data provided by resource agencies and other stakeholders. The review focused on identifying potential constraints to inform the range of alternatives and guide future environmental review under NEPA. Full details on the existing environmental data collected is provided in the *ProPEL Indy Final Environmental Constraints Report (Appendix C* of the PEL Study Report).
- Is this resource present in the area and what is the existing environmental condition for this resource?**
The *ProPEL Indy Final Environmental Constraints Report (Appendix C* to the PEL Study Report) provides a detailed evaluation of the existing conditions for the key resources within the study area. These resources are summarized below in **Table 3**.

Table 3. ProPEL Indy Environmental Resources Identified

Resource	Existing Environmental Condition
<u>Socio-economic</u> <ul style="list-style-type: none"> • Low-income and minority populations • Limited English Proficiency • Limited Vehicle Access • Limited Internet Access • Persons with Disabilities 	<ul style="list-style-type: none"> • 53 census block groups with minority populations of concern • 44 census block groups with low-income populations of concern • 71 census block groups with both minority and low-income populations of concern • 156 census block groups with LEP populations • 204 census block groups with limited vehicle access populations • 221 census block groups with limited internet access populations • 92 census tracts with persons with disabilities
Infrastructure Constraints	<ul style="list-style-type: none"> • Standard overhead and underground utilities • 28 railroads, both active and abandoned within the study area; 16 railroads that intersect or run adjacent to the study spokes, which are all grade-separated crossings • 19 airports are located within the study area, including two public and two private airports as well as four public and 11 private heliports
<u>Parks, Recreation Areas, Wildlife or Waterfowl Refuges, or Publicly Owned Historic Properties (Recreational Facilities)</u> <ul style="list-style-type: none"> • FHWA Section 4(f) Regulations (23 CFR 774) • Land and Water Conservation Fund Act (LWCF) of 1965 	<ul style="list-style-type: none"> • 49 recreational facilities, 48 managed lands, 43 trail segments, five cemeteries, and 402 historic resources were identified as potentially eligible Section 4(f) properties • Three Section 6(f) properties within the study area

Resource	Existing Environmental Condition
<u>Natural Resources</u> <ul style="list-style-type: none"> • NWI Wetlands • INDOT Mitigation Sites • Streams (including IDEM 303(D) Listed) • Floodplains and Flood Hazard Mitigation Grant Program Lands • Canal Structures and Canal Routes – Historic • Lakes • Protected Species 	<ul style="list-style-type: none"> • 98 NWI mapped wetlands • No INDOT mitigation sites • 336 stream segments mapped within the study area • 52 IDEM 303(D) Listed streams and lakes • 172 floodplain polygons • Two flood hazard mitigation grant program lands • One historic canal route • Study area is within range of the federally endangered Indiana bat (<i>Myotis sodalis</i>) and northern long-eared bat (<i>Myotis septentrionalis</i>), the proposed endangered tricolored bat (<i>Perimyotis subflavus</i>), the whooping crane (<i>Grus americana</i>), an “experimental population”, and the proposed threatened Monarch butterfly (<i>Danaus Plexippus</i>).
<u>Cultural Resources</u> <ul style="list-style-type: none"> • Above Ground • Archaeological • Historic Canal Structures • Historic Canal Routes • Centennial Farms 	<ul style="list-style-type: none"> • 402 potentially eligible structures within the study area (includes 98 already listed in the NRHP or Indiana Register) • 47 previously recorded archaeological sites within the study area • One historic canal route • 18 Centennial and three Sesquicentennial farms within Marion County
Mineral Resources/Petroleum Wells	<ul style="list-style-type: none"> • Three oil and gas wells
Air Quality	<ul style="list-style-type: none"> • The study area is located within Marion County, which is currently a maintenance area for 8-hour Ozone (1997). Center and Wayne townships within Marion County are currently maintenance areas for 1-Hour Sulfur Dioxide (SO₂). A small portion of Marion County within downtown Indianapolis is under a limited maintenance plan for carbon monoxide (CO). This area is bounded by 11th Street to the north, Capitol Avenue to the west, Georgia Street to the south, and Delaware Street to the east.
Noise	<ul style="list-style-type: none"> • 59 Common Noise Environments were preliminarily identified, with 39 areas likely requiring further investigation
Hazardous Materials	<ul style="list-style-type: none"> • 95 hazardous material resources, including underground storage tanks (USTs), leaking underground storage tanks (LUSTs), an infectious/medical waste site, institutional controls, National Pollutant Discharge Elimination Services (NPDES) facilities, NPDES pipe locations, landfills, and brownfield sites, are mapped directly adjacent to the interstates
<u>Other</u> Educational facilities, places of worship, hospitals, fire stations, police stations, etc.	<ul style="list-style-type: none"> • 43 educational facilities • 146 places of worship • One hospital • 10 fire and/or EMS operation facilities • Five police stations • Five libraries

c. What are the issues that need to be considered during NEPA, including potential resource impacts and potential mitigation requirements (if known)?

As projects resulting from the ProPEL Indy study move into the NEPA phase, a variety of environmental and community factors will require careful evaluation. These include potential impacts to natural resources, cultural resources, local infrastructure, noise impacts, and nearby homes, businesses, and public facilities. While the PEL study identified areas of concern at a high level, NEPA will require more detailed analysis, coordination with agencies, and public input to fully understand and address these impacts.

Key considerations will include avoiding or minimizing disruptions to communities during and after construction, identifying and minimizing impacts to sensitive communities, avoiding or minimizing impacts to historic properties through Section 106 consultation, managing environmental impacts such as water

resources or wildlife habitat, and minimizing noise impacts. Where impacts are unavoidable, appropriate mitigation strategies will need to be developed to reduce harm, including but not limited to, avoidance and minimization measures through design, time of year restrictions and best management practices during construction, and noise mitigation.

d. How will the planning data provided need to be supplemented during NEPA?

The planning-level data gathered in the ProPEL Indy study will need to be supplemented during the NEPA process through:

- Field investigations and site-specific surveys to confirm the presence, boundaries, and conditions of resources such as wetlands, streams, floodplains, historic properties, and hazardous materials.
- Updated GIS and technical data to reflect any changes since the planning study, such as new developments, environmental listings, or community demographics.
- Detailed impact assessments to evaluate potential effects of specific alternatives on natural, cultural, and human environments—something not fully developed in the planning phase.
- Agency coordination and public involvement tailored to NEPA requirements, including formal consultation under Section 106 (historic resources), Section 7 (endangered species), and Section 401/404 (streams and wetlands).
- Engineering refinement of alternatives to define footprints, construction methods, and design details needed for accurate environmental evaluation.

This additional analysis ensures that NEPA decisions are based on current, site-specific, and comprehensive information that builds upon—but goes beyond—the initial planning-level constraints review.

9. List environmental resources you are aware of that were not reviewed in the PEL study and why. Indicate whether or not they will need to be reviewed in NEPA and explain why.

All applicable environmental resources were reviewed at a cursory level based on secondary source data. Many of these resources will require more detailed field surveys and/or analysis during the NEPA phase for any projects advanced from this PEL study.

The resources identified during the PEL study are discussed in **Chapter 3** of the PEL Study Report and in the *ProPEL Indy Final Environmental Constraints Report (Appendix C* of the PEL Study Report).

Numerous archaeological resource sites were identified throughout the study area; however, in accordance with 54 USC 307103 and Indiana Code 14-21-1, which provide protection for archaeological sites and burial sites, information related to such resources is not publicly shared herein.

10. Were cumulative impacts considered in the PEL study? If yes, provide the information or reference where the analysis can be found.

No, cumulative impacts were not considered in the PEL study. They will be considered, as required, during future NEPA processes.

11. Describe any mitigation strategies discussed at the planning level that should be analyzed during NEPA.

No mitigation strategies were identified during the PEL study but will be developed, as needed, during the NEPA phase.

12. What needs to be done during NEPA to make information from the PEL study available to the agencies and the public? Are there PEL study products which can be used or provided to agencies or the public during the NEPA scoping process?

All applicable PEL study information and reports have been made available for public and agency review via public and agency meetings and the study website. This same approach can be used to make these PEL study products available during the NEPA scoping process.

13. Are there any other issues a future project team should be aware of?

- a. Examples: Controversy, utility problems, access or ROW issues, encroachments into ROW, problematic landowners and/or groups, contact information for stakeholders, special or unique resources in the area, etc.**

Chapter 6 of the PEL Study Report summarizes next steps and key considerations for future project teams. There are no additional issues at this time that a future project team should be made aware of other than what has been detailed in this PEL Study Report and associated appendices.