



**INDIANAPOLIS METROPOLITAN PLANNING ORGANIZATION**  
Planning the transportation future for the Indianapolis region

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Anna Gremling, Executive Director  
Indianapolis Metropolitan Planning Organization  
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Indianapolis, IN 46204

November 21, 2022

Jermaine R. Hannon  
Division Administrator  
Federal Highway Administration, Indiana Division  
575 N. Pennsylvania St., Rm 254  
Indianapolis, IN 46204-1576

Kelley Brookins  
Regional Administrator  
Federal Transit Administration, Region V  
200 West Adams St., Suite 320  
Chicago, IL 60606-5253

RE: Response to 2022-10 USDOT IMPO Certification Review Transmittal Letter

Mr. Hannon and Ms. Brookins,

As stated in the Certification Review Transmittal Letter, the Indianapolis Metropolitan Planning Organization (IMPO) was tasked with developing a sustainable plan of action for the following Corrective Action: “FHWA and FTA determined that the IMPO has not demonstrated consultation with the environmental resource agencies in the transportation planning process and does not meet the requirements outlined in 23 CFR 450.324 (f) (10).”

The IMPO’s plan of action is as follows:

1. The IMPO will be issuing a Request for Proposals for a major Metropolitan Transportation Plan (MTP) update (aka. 2050 MTP v2) in January 2023. The expected kick-off for that project will be May 2023 and is expected to be an 18-month update. As part of this major MTP update, the following tasks will be included:
  - a. The IMPO will invite representatives of the “Environmental Interest Parties” and “Interagency Consultation Group Parties”, as listed in the attachment to this letter, to be part of the 2050 MTP v2 Project Consultation/Steering Committee. Agencies who participate on the committee will contribute to brainstorming, review drafts, and attend meetings to engage in discussion on the contents and direction of the MTP.
  - b. The 2050 MTP v2 will include references to the Red Flag Investigation processes and potential mitigation measures. References will also be made to State NEPA processes (as applicable under the IMPO’s Federal Funds Exchange program).
  - c. The 2050 MTP v2 (including an expansion of the preferred regional land use scenario) will include discussions of environmental factors throughout the region including farmland,



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water bodies, floodplains, parks/greenways, and VRP/Superfund sites. The 2050 MTP v2 will also include an analysis of wetlands, streams/riparian corridors, reservoirs, historic sites, endangered species, etc. These factors will also be discussed in connection with documentation and mitigation requirements of State NEPA processes.

- i. The IMPO may consider environmental factors in selection of projects, while respecting already-established mitigation requirements.
2. For the current version of the 2050 MTP, which will remain active until the MTP major update is complete, the following tasks will be included:
  - a. The IMPO will directly notify representatives of the “Environmental Interest Parties” and “Interagency Consultation Group Parties”, as listed in the attachment to this letter, of comment periods for all MTP proposed amendments and consultation will be documented in an appendix of the MTP.

Should you have any questions or comments please contact me at (317) 327-5487.

Sincerely,

A handwritten signature in black ink that reads 'Anna M. Gremling'. The signature is written in a cursive, flowing style.

Anna Gremling, Executive Director  
Indianapolis Metropolitan Planning Organization  
Attachment: Organizations to Include in the 2050 MTP V2 Update

cc: Erica Tait, FHWA  
Michelle Allen, FHWA  
Cecilia Crenshaw-Godfrey, FTA Region V  
Roy Nunnally, Director of Technical Planning, INDOT



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## **Attachment: Organizations to Include in the 2050 MTP V2 Update**

### Environmental Interest Parties:

Indiana State Historic Preservation Officer (SHPO)  
Indiana Department of Natural Resources (DNR)  
U.S. Army Corps of Engineers (USACE)  
U.S. Fish and Wildlife Service (USFW)  
Purdue Climate Change Research Center  
IU Environmental Resilience Institute  
IUPUI Transportation and Autonomous Systems Institute (TASI)  
Hoosier Environmental Council  
Keep Indianapolis Beautiful  
White River Alliance  
Indianapolis Office of Sustainability  
County and Municipal Health Departments  
Indianapolis Cultural Trail / Pacers Bikeshare  
Indiana Farm Bureau Policy Team  
Health by Design  
Public Policy Institute

### Interagency Consultation Group Parties:

U.S. Environmental Protection Agency (EPA), Region V  
U.S. Federal Highway Administration (FHWA), Indiana Division  
U.S. Federal Transit Administration (FTA), Region V  
Indiana Department of Environmental Management (IDEM)  
City of Indianapolis Office of Sustainability  
Indiana Department of Transportation (INDOT), District Office Liaisons  
Indiana Department of Transportation (INDOT), Long Range Planning Section  
Indianapolis Public Transportation Corporation (IndyGo)  
City of Anderson Transit System (CATS)  
Central Indiana Regional Transportation Authority (CIRTA)  
Madison County Council of Governments (MCCOG)  
Columbus Area Metropolitan Planning Organization (CAMPO)