



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

October 11, 2019

This letter was sent to the listed parties.

RE: Dual Review Project: I-65/I-70 North Split Interchange Reconstruction Project
(Designation (Des.) Numbers (Nos.) 1592385 & 1600808)
IDNR DHPA No. 21534
Section 106 Update Memo #6 and Traffic Noise Barrier Addendum to Assessment of Effects
Report

Dear Consulting Party,

The Indiana Department of Transportation (INDOT) with funding from the Federal Highway Administration (FHWA) proposes to proceed with the I-65/I-70 North Split Interchange Reconstruction Project (North Split Project) in the City of Indianapolis, Marion County (Des. Nos. 1592385 & 1600808). HNTB Corporation is under contract with INDOT to advance the environmental documentation for the referenced project.

Project Location

The proposed undertaking includes the I-65/I-70 North Split interchange; south along I-65/I-70 to the Washington Street interchange; the portion of I-65 west of the North Split interchange to approximately Meridian Street; and, the portion of I-70 east of the North Split interchange to approximately the bridge over Valley Avenue (west of the Keystone Avenue/Rural Street interchange) in downtown Indianapolis, Marion County, Indiana. It is within Center Township, Beech Grove United States Geological Survey (USGS) Topographic Quadrangle, in Section 36, Township 16N, Range 3E; Sections 1 and 12, Township 15N, Range 3E; and Section 31, Township 16N, Range 4E.

State Certificate Approval Dual Review Process

Please note that per the permanent rule issued by the Indiana Department of Natural Resources (IDNR) effective August 14, 2013 (312 IAC 20-4-11.5), INDOT is requesting that this project be subjected to “dual review”; that is, reviewed by the Division of Historic Preservation and Archaeology (DHPA) simultaneously under 54 U.S.C. 306108 (Section 106) and IC 14-21-1-18 (Indiana Preservation and Archaeology Law dealing with alterations of historic sites and structures requiring a Certificate of Approval).

The following changes should be made to the consulting parties list for processing the dual review submission:

- Ms. Chelsea Humble, North Mass Program Manager from the Riley Area Development Corporation, should be added.
- Mr. Shawn Miller has replaced Mr. David Pflugh as the Chatham Arch Neighborhood Association representative.
- Mr. Don Stevens has replaced Dr. Michele Curran as the National Park Service representative.

Contact information for each are included in Attachment A.

Traffic Noise Analysis Addition to Assessment of Effects Report

The Assessment of Effects Report did not evaluate changes in noise levels because the results of the noise analysis were not yet available.

A traffic noise analysis¹ was completed in accordance with the INDOT Traffic Noise Analysis Procedure (2017) (INDOT noise policy). The INDOT noise policy, which was approved by FHWA, describes INDOT's implementation of the federal noise regulations found under 23 CFR 772. The purpose of the traffic noise analysis was to identify predicted traffic noise impacts and, where appropriate, abatement measures.

Existing (2017) and design year (2041) noise levels were determined using the latest version of the FHWA Traffic Noise Model (TNM). In accordance with the INDOT noise policy, all receptors within 500 feet were considered in the noise analysis. According to INDOT's policy, if the traffic noise analysis shows receptors within 500 feet are impacted, then the analysis area should be extended to 800 feet. Noise receptor locations located more 800 feet from the project roadway are not evaluated for highway traffic noise effects because the TNM model has not been demonstrated to be accurate beyond this distance. The traffic noise analysis for historic properties encompasses historic properties within 800 feet of the roadway project even though no noise impacts were identified beyond 500 feet. This represents a conservative approach to assessing the potential traffic noise impacts to historic properties resulting from the undertaking.

A noise analysis was not conducted for historic bridges because noise is not a component to their setting and because noise is also a consequence of their function.

Noise analysis results were evaluated for historic properties based on the criteria of adverse effect as defined in 36 CFR 800.5(a)(1):

“An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.”

Noise is generally defined as unwanted sound. Airborne sound occurs by a rapid fluctuation of air pressure above and below atmospheric pressure. Sound pressure levels are usually measured and expressed in decibels (dB). The decibel scale is logarithmic and expresses the ratio of the sound pressure unit being measured to a standard reference level.

Because decibels are logarithmic units, sound levels cannot be added by ordinary arithmetic means. The following general relationships provide a basic understanding of sound generation and propagation:

- An increase, or decrease, of 10 dB would be perceived by the human ear to be a doubling, or halving, of the sound level.
- Doubling the traffic volumes, keeping vehicle mix and speeds the same, and not changing the distance between the source and a receiver would increase the traffic noise level by 3 dB, which would be perceived as a barely noticeable change in outdoor settings.

¹ I-65/I-70 North Split Project Traffic Noise Technical Report (September 24, 2019)

Figure 1, which is excerpted from the FHWA Noise Barrier Design Handbook,² shows a scale relating various sounds encountered in daily life and their approximate decibel values.

Figure 1: Noise Decibel Scale

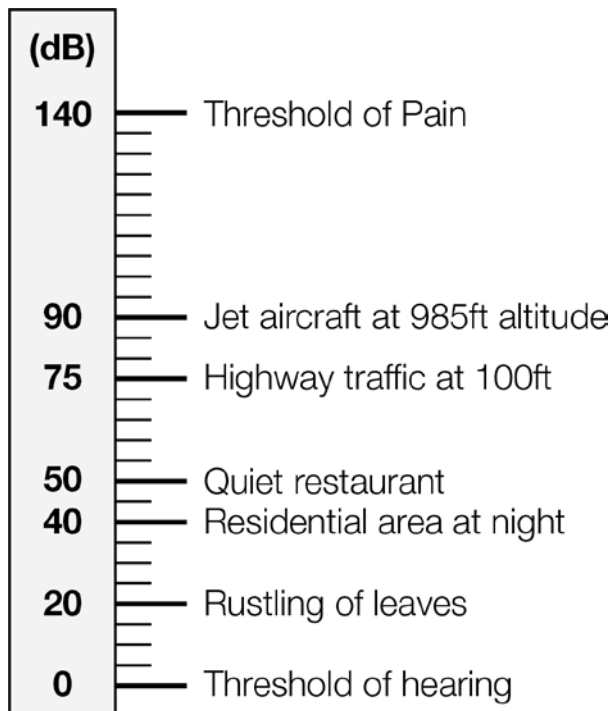


Table 1 shows the existing (2017) and predicted (2041) noise levels and the predicted change for historic properties within 800 feet of the proposed project. For historic districts, receptors were identified at representative locations close to the roadway within each historic district. A range of noise level changes for those historic districts with multiple receptors is also provided.

Most historic properties show a slight decrease in noise or predicted increases less than 3 dB(A). These types of changes are not unexpected due to construction of concrete safety barriers which can provide some noise reduction, changes in roadway geometry (some interchange ramps will be located farther from historic districts), and lack of substantial increases in modeled traffic volumes. According to FHWA, noise increases of 3 dB(A) or less are “barely detectible by the human ear.”³ The only value in the table over 3 dB(A) was the maximum value in the range for the Massachusetts Avenue Commercial Historic District of 3.7 dB(A). The low end of the range for that district was -0.5 dB(A). This is a busy, commercial district and noise would not be unexpected there. Because the change in noise levels would be just at the threshold of human perception and within a busy commercial area, the integrity of the historic resources would not have the potential to be diminished by the project. Therefore, no adverse effects to historic properties are anticipated from changes in highway traffic noise as a result of the project.

² “Noise Barrier Design Handbook,” Federal Highway Administration, accessed April 24, 2019.

³ “Highway Traffic Noise Analysis and Abatement Policy and Guidance: Noise Fundamentals,” Federal Highway Administration, accessed March 22, 2019, https://www.fhwa.dot.gov/Environment/noise/regulations_and_guidance/polguide/polguide02.cfm.

Table 1: Historic Resource Noise Results

Historic Resource	Existing dB(A) (2017)	Representative Build dB(A) (2041)	Representative Change	Representative Noise Level w/ Barrier	Historic District Change dB(A) Range
Holy Cross\Westminster Historic District	65.9	65.0	-0.9	N/A	-1.0 to -0.8
Cottage Home Historic District	60.2	60.5	+0.3	N/A	-0.6 to +1.0
John Hope School No. 26	67.1	66.8	-0.3	N/A	N/A
Old Northside Historic District	70.4	66.7	-3.7	60.4	-5.8 to +0.3
Morris-Butler House	70.4	66.7	-3.7	60.4	N/A
Benjamin Harrison Home/ Presidential Site	65.1	63.6	-1.5	N/A	N/A
Manchester Apartments	63.1	62.2	-0.9	N/A	N/A
Sheffield Inn	63.1	62.2	-0.9	N/A	N/A
Calvin I. Fletcher House	69.3	67.7	-1.6	N/A	N/A
Wyndham	70.8	68.6	-2.2	N/A	N/A
Pierson-Griffiths House	66.3	64.8	-1.5	N/A	N/A
Saint Joseph Neighborhood Historic District	71.7	69.3	-2.4	N/A*	-4.2 to 0
Delaware Court Apartments	61.4	60.5	-0.9	N/A	N/A
Bals-Wocher House	58.3	57.9	-0.4	56.4	N/A
Pearson Terrace	58.2	58.0	-0.2	56.3	N/A
William Buschman Block	59.9	59.5	-0.4	55.3	N/A
Chatham-Arch Historic District	66.3	64.1	-2.2	61.7	-3.5 to 0
Massachusetts Avenue Commercial Historic District	69.4	69.4	0.0	62.6	-0.5 to +3.7
Lockerbie Square Historic District	67.3	67.2	-0.1	59.1	-0.4 to +0.7
Gasteria Inc.	59.9	59.5	-0.4	N/A	N/A
Windsor Park Neighborhood Historic District	66.6	67.6	+1.0	N/A	N/A
Saints Peter and Paul Cathedral Parish Historic District	57.4	56.8	-0.6	N/A	N/A
Cole Motor Car Company	65.5	64.8	-0.7	N/A	N/A

*Representative build value is west of feasible and reasonable Noise Barrier 5.

Consulting Party Comments on Section 106 Finding Recommendations

As part of the Section 106 consultation process for the North Split Project, an Assessment of Effects Report was sent to consulting parties for review on August 9, 2019. The Assessment of Effects Report evaluated the effects of the project on 51 historic properties within the Area of Potential Effects (APE). Attachment B includes comments received from consulting parties from August 9, 2019 to September 12, 2019 regarding Section 106 Update Memo #5, the Assessment of Effects Report, and possible mitigation ideas. Responses are provided with each comment. Comments and responses are grouped by organization and the order they were received.

Several comments disagreed with the recommended Section 106 findings for some historic properties. Further explanation or a recommendation for a change in the finding are discussed for those properties below. The recommendations below do not account for the possible construction of noise barriers. Effects to historic properties from the possible construction of noise barriers are examined in a Traffic Noise Barrier Addendum to the Assessment of Effects Report as discussed later in this update memo.

Benjamin Harrison Home/Presidential Site – The Benjamin Harrison Home/Presidential Site was listed as a National Historic Landmark (NHL) in 1964 and was subsequently listed in the National Register of Historic Places (NRHP) in 1966. It is also a contributing resource in the Old Northside Historic District, which was listed in 1978. It should be noted that even with a finding of No Adverse Effect to the individual property, a finding of Adverse Effect for the historic district would apply to the Benjamin Harrison Home/Presidential Site as a contributing building. As a member of the Old Northside community, the Benjamin Harrison Home/Presidential Site's participation in the development of mitigation for the Adverse Effect to the Old Northside Historic District are welcomed.

As a result of comments received from the Benjamin Harrison Home/Presidential Site, a qualified professional historian reexamined the effects of the proposed project on the Benjamin Harrison Home/Presidential Site. As noted on pages 155-156 of the Assessment of Effects Report and shown on the map on Figure 5, Sheets 3 and 4 (pages 13 and 14), the North Split proposed edge of shoulder will be located approximately 67 feet south of the property's NRHP and NHL boundaries and approximately 390 feet south of the house itself. Those are essentially the same distances as the existing conditions.

The project will not require acquisition of property from the NRHP or NHL boundaries of the Benjamin Harrison Home/Presidential Site. In addition, the Pennsylvania Street exit ramp from I-65 will be reconstructed just south of the Benjamin Harrison Home/Presidential Site within the existing right-of-way (see page 156 and Appendix A of the Assessment of Effects Report). Neither the interstate nor the Pennsylvania Street exit ramp will be wider or higher than existing conditions in front of the Benjamin Harrison Home/Presidential Site. After construction, the interstate will appear very similar to how it does today in the vicinity of this property.

Removal of mature trees on 12th Street was cited in a comment letter from the Benjamin Harrison Home/Presidential Site as diminishing the integrity of the historic house's setting, feeling, and association. Tree removal along 12th Street will start east of Alabama Street. At its closest point, this tree removal will be approximately 585 feet southeast of the Benjamin Harrison Home/Presidential Site. Intervening structures limit sight lines of the tree removal from the property. Some trees may require removal within the existing INDOT right-of-way south of the Benjamin Harrison Home/Presidential Site boundary along the alley between Delaware and Talbot Streets. However, as shown in Photograph 67 on page 157 of the Effects report, this vegetation provides only a minimal amount of visual screening, and its removal is not anticipated to affect the character of the historic district. Other elements identified in the comment letter from the Benjamin Harrison Home/Presidential Site as potentially diminishing the integrity of the historic house's setting, feeling, and association are limitations of interstate access, increased traffic, and sound and vibration. The impacts of temporary increases in heavy truck traffic and permanent traffic changes were evaluated for the Assessment of Effects Report (see page 156 and Appendix A). No temporary increases in heavy truck traffic are anticipated near this property. Permanent traffic changes will result in a total volume rate change of 0.2 vehicle/minute/lane; as a result, permanent traffic changes are anticipated to be minor near this property. Vibration impacts were also evaluated, and vibration impacts are not anticipated due to the distance of the Benjamin Harrison Home/Presidential Site from the undertaking.

The Benjamin Harrison Home/Presidential Site will still have ample access from the interstates. The Pennsylvania Street exit ramp will remain open to I-65 northbound traffic after construction; however, westbound I-70 traffic will not be able to exit at the ramp. Westbound I-70 traffic will continue to have access to downtown Indianapolis via Michigan Street and West Street. Access from southbound I-65 will be unaffected. Access from the northbound I-65 and from eastbound I-70 will be smoother and safer on the new Pennsylvania Street exit ramp. The only affected movement will be from I-70 westbound. That traffic can either exit to Michigan Street then turn north on Delaware Street; exit to Rural/Keystone, turn left on 25th Street, then turn left on Pennsylvania Street; or exit to West Street, turn left on 10th Street, then turn left on Delaware Street to reach the facility. The Michigan Street route would add about 1.1 miles to the trip, the Rural/Keystone route would add about 1.2 miles, and the West Street route would add about 1.5 miles. Again, only one access point is being affected, involving only those visitors traveling on I-70 westbound.

Based on the information above, INDOT has concluded the project will not alter, directly or indirectly, any of the characteristics of the historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT continues to recommend a finding of No Adverse Effect for this historic property. As stated above, however, the finding of Adverse Effect for the Old Northside Historic District would apply to the Benjamin Harrison Home/Presidential Site as a contributing building.

Saint Joseph Neighborhood Historic District – As a result of comments received regarding the Saint Joseph Neighborhood Historic District, a qualified professional historian reexamined the effects of the proposed project on the historic district. As noted on pages 51-52 of the Assessment of Effects Report and shown on the map on Figure 5, Sheets 5-9 (pages 15-19), the North Split proposed edge of shoulder will be located between approximately eight and 20 feet closer to the district's NRHP boundary. As a point of clarification, the historic district is six feet away from proposed sidewalk improvements along Delaware Street near the existing entrance ramp to the interstate, as shown on page 15 of the Assessment of Effects Report. It will not be six feet from the interstate mainline, as was suggested by consulting party comments. The interstate mainline will be 20 feet closer at the district's eastern edge. The proposed interstate edge of shoulder will be approximately 55 feet from the historic district boundary at that location.

As discussed in the Assessment of Effects Report, in the vicinity of the Saint Joseph Neighborhood Historic District, the project will include the reconstruction of the Delaware Street entrance ramp within the existing right-of-way, increased elevation of the roadway, construction of a retaining wall, and the removal of existing vegetation in the right-of-way adjacent to the historic district. The reconstruction of the Delaware Street entrance ramp will move the edge of pavement closer to the historic district boundary. The elevation will increase slightly toward the east, and will be four feet taller than existing at the Central Avenue bridge (see pages 51-52, Figure 6, Sheet 1 (page 33); Figures 9 and 10 (pages 54 and 55) of the Assessment of Effects Report).

In addition, the undertaking will require the construction of a retaining wall from east of Alabama Street to the interchange in order to accommodate fill slopes south of the reconstructed ramp and adjacent to the historic district. The height of the retaining wall would vary in the vicinity of the Saint Joseph Neighborhood Historic District, but could be as much as approximately 10-12 feet tall, not including the height of guardrail or Jersey barriers. A split wall (portion near the top and portion at the bottom, with a vegetated bench) could be used in place of a single wall (see Figure 6, Sheet 1 (page 33) of the Assessment of Effects Report). This is among the retaining wall options being reviewed in the Context Sensitive Solutions (CSS) process. There are small trees and non-historic brush in the right-of-way that

provides some screening of the highway from the historic district, but it is anticipated that all existing vegetation will be removed.

After a reexamination of the consulting party comments and information above, INDOT has concluded this visual intrusion will be substantially greater than the existing visual intrusion of the roadway because the proposed edge of pavement will be 20 feet closer to the historic district boundary at its northeastern end. Therefore, INDOT has concluded the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.

Massachusetts Avenue Commercial Historic District – As a result of comments received regarding the Massachusetts Avenue Commercial Historic District, a qualified professional historian reexamined the effects of the proposed project on the historic district. As noted on pages 65-67 of the Assessment of Effects Report and shown on the map on Figure 5, Sheet 11 (page 21), the historic district is 67 feet from the proposed edge of shoulder at its closest point.

The Massachusetts Avenue Commercial Historic District is adjacent to the North Split Project. Within view of the historic district, the I-65/I-70 bridges over 10th Street will be replaced; the replacement bridge closest to the historic district will be approximately four feet taller than existing. In addition, this bridge will shift away from the Massachusetts Avenue Commercial Historic District to the east a distance of 15 feet at the south end and 70 feet at the north end. Within the reconfigured North Split interchange, the reconstructed I-65 southbound to I-70 eastbound ramp will be approximately 17 feet taller than the existing high point in the interchange. The high point of the new ramp will be approximately 930 feet from the boundary of the Massachusetts Avenue Commercial Historic District (see page 65 and Figure 6, Sheets 1 and 2 (pages 33 and 34) of the Assessment of Effects Report). Although this new ramp is likely to be visible from within the north end of the historic district, it will not be a significant visual change from existing conditions because of the distance between the district and the new high point.

The proposed interchange reconfiguration will move some ramps farther away from the northern boundary of the Massachusetts Avenue Commercial Historic District, in particular the existing I-65 southbound ramp to the collector-distributor (C-D) road. The embankments of the former ramps could be left in place to help screen the highway from abutting neighborhoods. Existing non-historic vegetation located within INDOT's right-of-way adjacent to the historic district will be removed as part of the project construction. This vegetation provides only a minimal amount of visual screening, and its removal is not anticipated to affect the character of the historic district.

The impacts of temporary increases in heavy truck traffic and permanent traffic changes were evaluated for the Assessment of Effects Report (see page 67 and Appendix A). The largest temporary increase in heavy trucks during construction in the peak hour is 19 on Massachusetts Avenue. Permanent traffic changes will result in a total volume rate change increase on Massachusetts of 1.8 vehicle/minute/lane; on Michigan Street, the total volume rate change is anticipated to be 2.8 vehicle/minute/lane; and, for Vermont Street, the total volume rate change is anticipated to be 1.8 vehicle/minute/lane. As a result, permanent traffic changes are anticipated to be minor near the Massachusetts Avenue Commercial Historic District. Vibration impacts were also evaluated, and vibration impacts are possible at this location. As a result, the contractor will be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties.

The existing roadway is a visual intrusion along the eastern edge of the historic district. In response to consulting party comments that the effect finding for the Massachusetts Avenue Commercial Historic District should be the same as for the Chatham-Arch Historic District, the NRHP boundaries of the Massachusetts Avenue Commercial Historic District and Chatham-Arch Historic District do overlap the along Massachusetts Avenue. However, the Adverse Effect finding for the Chatham Arch Historic District is largely based on the substantial visual intrusion of the proposed project near I-65 and College Avenue, which is adjacent to the Chatham-Arch Historic District's boundary, but is over 700 feet from the Massachusetts Avenue Commercial Historic District. The proposed roadway will not be substantially different from the existing condition where it is closest to the Massachusetts Avenue Commercial Historic District. Based on the information above, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of the historic district that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for this historic district.

Lockerbie Square Historic District – As a result of comments received regarding the Lockerbie Square Historic District, a qualified professional historian reexamined the effects of the proposed project on the historic district. As noted on pages 70-74 of the Assessment of Effects Report and shown on the map at Figure 5, Sheets 12-13 (pages 22-23), the North Split proposed edge of shoulder of the Michigan Street exit ramp will be located approximately 44 feet north of the district's NRHP boundary.

As a result of the project, the interstate pavement will be a maximum of 5 feet closer near Ohio Street. This location is over 600 feet from the historic district with several buildings in the existing sight line that limit views of the interstate. In the area where the interstate is nearest the historic district, the edge of pavement will not be any closer to the district than it is now. Non-historic vegetation located within INDOT's right-of-way along east side of Davidson Street adjacent to the historic district will likely be removed as part of the undertaking. This removal of vegetation is not anticipated to result in increased sound levels or affect the character of the historic district. Bridges will be replaced over Michigan, Vermont, and New York Streets. The replacement bridges are anticipated to range between 3 to 8 feet taller than existing (see page 70 and Figure 6, Sheets 4 and 5 (pages 36 and 37) of the Assessment of Effects Report). In addition, the Vermont Street bridge will no longer be converted to a pedestrian-only passage bridge as was originally proposed.

The impacts of temporary increases in heavy truck traffic and permanent traffic changes in the vicinity of the Lockerbie Square Historic District were evaluated for the Assessment of Effects Report (see page 73 and Appendix A). The largest temporary increase in heavy trucks during construction in the peak hour is 11 on College Avenue. Permanent traffic changes near the Lockerbie Square Historic District are anticipated to be minor, with the exception of Michigan Street. Michigan Street showed a density (total volume rate change) increase of 3.1 vehicle/minute/lane during the AM peak hour. As discussed on pages 73 and 74 of the Assessment of Effects Report, this increase in traffic may be perceptible during the AM peak period, but the forecasted traffic is still anticipated to be under capacity for Michigan Street. Based on the available traffic projections, the change in traffic does not rise to a level that would diminish the district's historic integrity. Vibration impacts were also evaluated, and vibration impacts are possible. As a result, the contractor will be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties.

The existing roadway is a visual intrusion along the eastern edge of the historic district. The proposed roadway will not be substantially different from the existing condition. Based on the information above, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of the Lockerbie Square Historic District that qualify it for inclusion in the NRHP in a manner that would

diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for this historic district.

Holy Cross/Westminster Historic District – As a result of comments received regarding the Holy Cross/Westminster Historic District, a qualified professional historian reexamined the effects of the proposed project on the historic district. As noted on pages 153-154 and Figure 5, Sheets 14 and 21 (pages 24 and 31) and Figure 6, Sheets 4 and 5 (pages. 36 and 37) of the Assessment of Effects Report, the North Split proposed edge of shoulder will be located approximately 69 feet from the historic district's NRHP boundary.

The only project components that are likely to be visually apparent from within the historic district are the replacement of the I-65/I-70 bridges over Washington Street, Market Street, Ohio Street/CSX Railroad, and New York Street. The Washington Street bridge will be approximately one foot taller than the existing; the Market Street bridge will not be taller than existing; the New York Street bridge will be approximately six feet taller (see page 153 and Figure 6, Sheets 4 and 5 (pages. 36 and 37) of the Assessment of Effects Report). The proposed replacement bridges are not anticipated to differ significantly from the existing bridges and will not significantly alter the setting of the Holy Cross/Westminster Historic District. Additional bridges over Vermont and Michigan streets will not be significantly visible from within the historic district because of the distance between the bridges and the district.

The impacts of temporary increases in heavy truck traffic and permanent traffic changes were evaluated for the Assessment of Effects Report (see page 56 and Appendix A). The largest temporary increase in heavy trucks during construction in the peak hour is 15 on Washington Street. Permanent traffic changes are anticipated to be minor near and within the Holy Cross/Westminster Historic District. Vibration impacts were also evaluated, and vibration impacts are possible. As a result, the contractor will be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties.

The existing roadway is a visual intrusion along the western edge of the historic district. The proposed roadway will not be substantially different from the existing condition. Based on the information above, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics that qualify the Holy Cross/Westminster Historic District for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for this historic district.

Cottage Home Historic District – As a result of comments received regarding the Cottage Home Historic District, a qualified professional historian reexamined the effects of the proposed project on the historic district. As noted on pages 79-80, Figure 5, Sheets 19 and 20 (pages 29 and 30), and Figure 6, Sheet 4 (page 36) of the Assessment of Effects Report, the North Split proposed edge of shoulder will be located approximately 471 feet from the district's NRHP boundary.

As part of the project, the I-65/I-70 bridges over St. Clair Street will be replaced within view of the Cottage Home Historic District. The new bridges will be approximately three feet taller than the existing bridges (see page 79 and Figure 6, Sheet 4 (page 36) of the Assessment of Effects Report). The height and length of the replacement bridges are not anticipated to differ significantly from the existing bridges and will not significantly alter the setting of the historic district. In addition to the above, all existing vegetation within INDOT's right-of-way is anticipated to be removed as part of the project. The existing

vegetation is largely imperceptible from the historic district, and its removal will not have an effect on the historic district.

The impacts of temporary increases in heavy truck traffic and permanent traffic changes were evaluated for the Assessment of Effects Report (see page 80 and Appendix A). The largest temporary increase in heavy trucks during construction in the peak hour is one on St. Clair Street, Dorman Street, and Highland Avenue. Permanent traffic changes will result in a total volume rate change increase of 0.1 vehicle/minute/lane on Highland Avenue; as a result, permanent traffic changes are anticipated to be minor near the Cottage Home Historic District. Vibration impacts were also evaluated, and vibration impacts are not anticipated.

The existing roadway is a visual intrusion in the district's setting, but it is over 400 feet away from the historic district. The proposed roadway will not be substantially different from the existing condition. Based on the information above, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of the Cottage Home Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for this historic district.

Traffic Noise Barrier Addendum to Assessment of Effects Report

A Section 106 Traffic Noise Barrier Addendum to Assessment of Effects Report has been prepared for the project. The report evaluates the effects possible noise barrier construction to the historic properties within the North Split Project APE. The Traffic Noise Barrier Addendum to Assessment of Effects Report 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 are invited to review this document and respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. If you prefer a hard copy of this material, please respond to this email with your request within seven days.

Consulting Parties Meeting/WebEx

We would like to invite you to participate in a Consulting Parties Meeting on October 29, 2019 at the Ivy Tech Community College Culinary and Conference Center, 2820 N. Meridian St., Indianapolis, Indiana 46208, from 4:30 to 6:30 p.m. Indianapolis time. Parking is free in the Ivy Tech Community College parking lot adjacent to the building. You may participate in person or by WebEx and conference call using the information below. At this meeting, we will discuss the noise analysis, possible noise barriers and effects to historic properties, possible mitigation ideas, and next steps in the Section 106 consultation process.

When it's time, join your Webex by clicking the link below:

<https://hntb.webex.com/mw3300/mywebex/default.do?siteurl=hntb&AT=HM&ST=SUCCESS&MK=740056577&rnd=0.48724542869945286>

Meeting number (access code): 743 060 549

Join by phone

+1-415-655-0002 US Toll

+1-855-797-9485 US Toll free

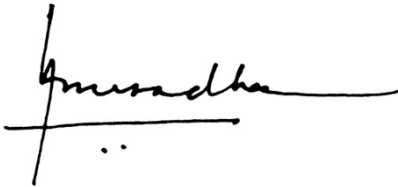
Please review the information and comment within 30 calendar days of receipt. For questions concerning specific project details, you may contact Kia Gillette of HNTB Corporation at 317-636-4682 or

kgillette@hntb.com. All future responses regarding the proposed project should be forwarded to HNTB Corporation at the following address:

Kia Gillette
Environmental Project Manager
HNTB Corporation
111 Monument Circle
Indianapolis, Indiana 46204
kgillette@hntb.com

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-233-6795 or Michelle Allen at FHWA at michelle.allen@dot.gov or 317-226-7344.

Sincerely,

A handwritten signature in black ink, appearing to read "Anuradha", written over a horizontal line. There are two small dots below the line.

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

Attachment A - Consulting Parties List & Contact Information
Attachment B - Consulting Party Comments & Responses
Traffic Noise Barrier Addendum to Assessment of Effects Report

Distribution List:

Chad Slider, IDNR-Division of Historic Preservation and Archaeology
Wade Tharp, IDNR-Division of Historic Preservation and Archaeology
Marsh Davis, Indiana Landmarks
Mark Dollase, Indiana Landmarks
Chad Lethig, Indiana Landmarks & Historic Urban Neighborhoods of Indianapolis
Don Stevens, National Park Service, Midwest Region
Marjorie Kienle, Historic Urban Neighborhoods of Indianapolis
Garry Chilluffo, Historic Urban Neighborhoods of Indianapolis
Meg Purnsley, Indianapolis Historic Preservation Commission
Brad Beaubien, Indianapolis Department of Metropolitan Development
Melody Park, Indianapolis Department of Public Works
Garry Elder, Old Northside Neighborhood Association
Nancy Inui, Old Northside Neighborhood Association
Travis Barnes, Old Northside Neighborhood Association
Hilary Barnes, Old Northside Neighborhood Association
Charles Hyde, Benjamin Harrison Presidential Site
Mark Godley, St. Joseph Historic Neighborhood Association

Shawn Miller, Chatham Arch Neighborhood Association
Jeffrey Christoffersen, Lockerbie Square People's Club
Jen Eamon, Windsor Park Neighborhood Association
Jen Higginbotham, Holy Cross Neighborhood Association
Pat Dubach, Holy Cross Neighborhood Association
Kelly Wensing, Holy Cross Neighborhood Association
Jason Rowley, Holy Cross Neighborhood Association
Crystal Rehder, Cottage Home Neighborhood Association
Jim Jessee, Cottage Home Neighborhood Association
Meg Storrow, Massachusetts Avenue Merchants Association
Ruth Morales, Mayor's Neighborhood Advocate, Area 10
Isaac Bamgbose, Hendricks Commercial Properties
David Hittle, NESCO Land Use
Jon Berg, John Boner Neighborhood Centers
Patricia and Charles Perrin, Property Owners
Desiree Calderella, Fountain Square Neighborhood Association
Jordan Ryan, North Square Neighborhood Association
David Forsell, Keep Indianapolis Beautiful, Inc.
Joe Jarzen, Keep Indianapolis Beautiful, Inc.
Luke Leising, Property Owner
Mark Beebe, American Institute of Architects
Glenn Blackwood, Fletcher Place Neighborhood Association
Jim Lingenfelter, Southeast Neighborhood Land Use Committee
Josephine Rogers-Smith, Martindale Brightwood Neighborhood
Paul Knapp, Interstate Business Group
Betsy Merritt, National Trust for Historic Preservation
Sarah Stokely, Advisory Council on Historic Preservation
Mandy Ranslow, Advisory Council on Historic Preservation
Sandy Cummings, Property Owner
Denise Halliburton, Old Near Westside/Ransom Place
Chelsea Humble, Riley Area Development Corporation
Diane Hunter, Miami Tribe of Oklahoma

Section 106 Update Memo #6

Attachment A

**Consulting Parties List
& Contact Information**

I-65/I-70 North Split Interchange Reconstruction
 Des. Nos. 1592385 & 1600808
 Consulting Parties List (10/11/2019)

Organization	Contact Name	Title	E-Mail
IDNR-Division of Historic Preservation and Archaeology	Chad Slider	Deputy State Historic Preservation Officer	CSlider@dnr.IN.gov
IDNR-Division of Historic Preservation and Archaeology	Wade Tharp	Archaeologist	WTharp1@dnr.IN.gov
Indiana Landmarks	Mark Dollase	Vice President of Preservation Services	mdollase@indianalandmarks.org
Indiana Landmarks	Marsh Davis	President	mdavis@indianalandmarks.org
National Park Service, Midwest Region	Don Stevens		Don_Stevens@nps.gov
Historic Urban Neighborhoods of Indianapolis	Marjorie Kienle		mlkienle@indy.rr.com
Historic Urban Neighborhoods of Indianapolis	Garry Chilluffo		garry@chilluffo.com
Historic Urban Neighborhoods of Indianapolis/Indiana Landmarks	Chad Lethig	Secretary/Indianapolis Preservation Coordinator	clethig@indianalandmarks.org
Indianapolis Historic Preservation Commission	Meg Purnsley	Administrator, Indianapolis Historic Preservation Commission/City of Indianapolis	Meg.Purnsley@indy.gov
Indianapolis Department of Metropolitan Development	Brad Beaubien	Principal Planner	Brad.Beaubien@indy.gov
Indianapolis Department of Public Works	Melody Park	Chief Engineer	Melody.Park@indy.gov
Old Northside Neighborhood Association	Garry Elder	President	eldergarry@sbcglobal.net
Old Northside Neighborhood Association	Nancy Inui		nsinui@ameritech.net
Old Northside Neighborhood Association	Travis Barnes		travis@hoteltangowhiskey.com

I-65/I-70 North Split Interchange Reconstruction
 Des. Nos. 1592385 & 1600808
 Consulting Parties List (10/11/2019)

Organization	Contact Name	Title	E-Mail
Benjamin Harrison Presidential Site	Charles A. Hyde	President and CEO	chyde@bhpsite.org
St. Joseph Historic Neighborhood Association	Mark Godley	President	mgodley@chestnut.org
Chatham Arch Neighborhood Association	Shawn Miller	President	canaindy@gmail.com
Lockerbie Square People's Club	Jeffrey Christoffersen		jeff@thechristoffersens.com
Windsor Park Neighborhood Association, Inc.	Jen Eamon	President	wearewindsorpark@gmail.com
Holy Cross Neighborhood Association	Jen Higginbotham		Jen_Higginbotham@yahoo.com
Holy Cross Neighborhood Association	Pat Dubach		pdubach@redev.net
Holy Cross Neighborhood Association	Kelly Wensing		kellywensing@gmail.com
Holy Cross Neighborhood Association	Jason Rowley		jrowley@hanson-inc.com
Cottage Home Neighborhood Association	Crystal Rehder	President, Cottage Home Neighborhood Indianapolis	cottagehomeneighborhood@gmail.com
Cottage Home BOD	Jim Jessee		jamesjessee102@gmail.com
Massachusetts Avenue Merchants Association	Meg Storrow		storrow@storrowkinsella.com
Mayor's Neighborhood Advocate, Area 10	Ruth Morales		ruth.morales@indy.gov
Hendricks Commercial Properties	Isaac Bamgbose	Vice President - Asset Management	Isacc.Bamgbose@hendricksgroup.net
NESCO Land Use	David Hittle		davidhittle@gmail.com
Fountain Square Neighborhood Association	Desiree Calderella	President	fsna1835@gmail.com
John Boner Neighborhood Centers	Jon Berg	IndyEast Promise Zone Director	jberg@jbncenters.org

I-65/I-70 North Split Interchange Reconstruction
 Des. Nos. 1592385 & 1600808
 Consulting Parties List (10/11/2019)

Organization	Contact Name	Title	E-Mail
Property Owners	Patricia and Charles Perrin		pperrin@indy.rr.com
North Square Neighborhood Association	Jordan Ryan		jordanblairryan@gmail.com
Keep Indianapolis Beautiful, Inc.	David Forsell	President	dforsell@kibi.org
Keep Indianapolis Beautiful, Inc.	Joe Jarzen	Vice President of Program Strategy	jjarzen@kibi.org
Property Owner	Luke Leising		luke@guidondesign.com
American Institute of Architects	Mark Beebe		mbeebe@lancerbeebe.com
Fletcher Place Neighborhood Association, Inc.	Glenn Blackwood		glennblackwood@gmail.com
Southeast Neighborhood Land Use Committee	Jim Lingenfelter		jimlingenfelter@five2fivedesign.com
Martindale Brightwood Neighborhood	Josephine Rogers-Smith	Executive Director	jrogers@mbcdc.org
Interstate Business Group	Paul Knapp		pknapp@yandl.com
National Trust for Historic Preservation	Betsy Merritt	Deputy General Council	emerritt@savingplaces.org
Advisory Council on Historic Preservation	Sarah Stokely	Program Analyst	sstokely@achp.gov
Advisory Council on Historic Preservation	Mandy Ranslow	FHWA Liaison/Program Analyst	mranslow@achp.gov
St. Joseph Neighborhood Property Owner	Sandy Cummings		sandycummings2003@yahoo.com
Old Near Westside/Ransom Place	Denise Halliburton		d_halliburton@hotmail.com
Old Northside Neighborhood Association	Hilary Barnes		hitalyor09@gmail.com
Riley Area Development Corporation	Chelsea Humble	North Mass Program Manager	chelsea.humble@rileyarea.org
Tribes			
Miami Tribe of Oklahoma	Diane Hunter	THPO	dhunter@miamination.com

Section 106 Update Memo #6

Attachment B

Consulting Party Comments & Responses



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

Table B.1: I-65/I-70 North Split Project (Des. Nos. 1592385 & 1600808) – Consulting Party & Public Comments & Responses from August 9, 2019 to September 11, 2019 to Section 106 Update Memo #5, Assessment of Effects Report, and Mitigation Ideas

Note: Comments in italics were responded to previously via email.

Comment	Response
Miami Tribe of Oklahoma – Diane Hunter – August 9, 2019	
<i>Regarding the Consulting Parties meeting on August 29, 2019....will the discussion of historic properties only cover above ground properties? Or will archaeological sites be discussed as well?</i>	<i>The meeting will largely cover above ground properties. We anticipate having a slide that provides a brief update on the archaeological surveys. If you would prefer not to participate in the meeting, we could send the archaeology update slide and talking points to you separately.</i>
<i>I would appreciate receiving the archaeology update slide and talking points, and then I will not need to attend the meeting.</i>	<i>A pdf of the archaeology slide and talking points were emailed to Ms. Hunter the morning of August 29, 2019 prior to the meeting.</i>
Benjamin Harrison Presidential Site – Charles Hyde – August 9, 2019	
Thank you for the invitation. As I mentioned at last night’s meeting, I have a scheduling conflict and will be at a national history conference in Philadelphia at this time. I’ve copied in Bethany Gosewehr from the Presidential Site to help represent us.	Ms. Gosewehr represented the Benjamin Harrison Presidential Site at the Consulting Parties meeting on August 29, 2019.
Benjamin Harrison Presidential Site – Charles Hyde – September 11, 2019	
As you’ll see, we remain concerned about the adverse impacts of the interstate, especially relating to: significant reduction in direct interstate access to the museum; potential noise and aesthetic concerns; and overall viewshed diminishment. We believe these issues will directly and indirectly compromise the integrity of the historic property’s setting, feeling, and association.	<p>As noted on pages 155-156 of the Assessment of Effects Report and shown on the map on pages 13 and 14, the North Split proposed edge of shoulder will be located approx. 67 feet south of the property’s NRHP and NHL boundaries and approximately 390 feet south of the house itself. Those are essentially the same distances as the existing conditions.</p> <p>The project will not require acquisition of property from the NRHP or NHL boundaries of the Benjamin Harrison Home/Presidential Site. In addition, the Pennsylvania Street exit ramp from I-65 will be reconstructed just south of the Benjamin Harrison Home/Presidential Site within the existing right-of-way (see page 156 of the Effects Report). Neither the interstate nor the Pennsylvania Street exit ramp will be wider or higher than existing conditions in front of the Benjamin Harrison Home/Presidential Site. After construction the interstate will appear very similar to how it does today in the vicinity of this property.</p> <p>The Pennsylvania Street exit ramp will remain open to I-65 northbound traffic after construction; however, westbound I-70 traffic will not be able to exit at the ramp. Westbound I-70 traffic will continue to have access to downtown Indianapolis</p>

	<p>via Michigan Street and West Street. Although traffic coming from one direction on the interstate system will take a few minutes longer to get to the property, INDOT has determined this would adversely affect the integrity of the historic property. Additional information regarding access is provided below in response to another comment in this correspondence.</p> <p>In addition, as presented in Section 106 Update Memorandum #6, the existing dB(A) at the Benjamin Harrison Home/Presidential Site is 65.1; the representative build dB(A) is anticipated to be 63.6, for a decrease of 1.5 dB(A).</p>
<p>We recognize the need for the infrastructure improvement on the interstate itself, and look forward to partnering to help identify ways to formally mitigate the potential adverse impact on the Old Northside Neighborhood, the National Historic Landmark residence of the 23rd President of the United States, and overall Benjamin Harrison Presidential Site property.</p>	<p>As part of the Section 106 process, INDOT and FHWA will mitigate for Adverse Effects to historic properties. At this time, INDOT is not recommending an Adverse Effect to the Benjamin Harrison Home/Presidential Site as an individual resource, but the Site contributes to the Old Northside Historic District, where INDOT is recommending an Adverse Effect. As a member of the Old Northside community, the Benjamin Harrison Home/Presidential Site's participation is welcomed in the development of mitigation for the Adverse Effect to the Old Northside Historic District.</p>
<p>In regards to the Consulting Parties Meeting of August 29, 2019, we wanted to formally express our concerns relating to your assessment of the proposed interstate improvements as having "no adverse effect" on the Benjamin Harrison Presidential Site.</p> <p>This is all the more confusing as our property is the gateway to the Old Northside neighborhood, which is itself designated as being adversely affected. As you may know, our property is immediately adjacent to the proposed interstate work, including the Pennsylvania Street off ramp and on ramp from Delaware Street, and as such is impacted by a four-block frontage of interstate viewshed and related noise.</p> <p>The Harrison's residence is a National Historic Landmark property, and is the original home of America's Hoosier President, Benjamin Harrison, and his wife, First Lady Caroline Harrison. As one of Indiana's foremost citizens, highly esteemed statesman, and veteran of the Civil War, it is all the more important for Indiana to give special consideration and weight to protecting one of its most significant historic properties. In addition to this, it is a vital education resource, serving more than 17,000 school children each year from across the state of Indiana, and is a significant tourism driver for central Indiana, listed as #5 out of top "Things to Do" in Indianapolis by TripAdvisor.</p> <p>As the official adverse effect language states: When an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the</p>	<p>As the Assessment of Effects Report summarizes on page 156, the proposed undertaking will result in minor impacts to the setting of the Benjamin Harrison Home/Presidential Site and the Old Northside Historic District due to anticipated minor increases in traffic. The present interstate alignment is an already existing intrusion on the integrity of the setting of the Benjamin Harrison Home/Presidential Site. Neither the interstate nor the Pennsylvania Street exit ramp will be wider or higher than existing conditions in front of the Benjamin Harrison Home/Presidential Site. After construction the interstate will appear very similar to how it does today in the vicinity of this property. The project activities described above will not make the intrusion more visible from the property and will have no impact on the characteristics that qualify it for the NRHP in a manner that would diminish its integrity. The interstate will be wider and taller starting east of Alabama Street, adjacent to the Old Northside Historic District.</p> <p>Thank you for the information regarding the significance of the property. The Benjamin Harrison Home/Presidential Site was designated a National Historic Landmark in 1964 (see Assessment of Effects Report, page 155).</p> <p>As part of the Section 106 process, INDOT and FHWA will mitigate for Adverse Effects to historic properties. At this time, INDOT is not recommending an Adverse Effect to the</p>

<p>property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.</p> <p>There is no question that the interstate work as currently proposed-if unmitigated-will directly and indirectly diminish the integrity of the historic house's setting, feeling, and association:</p> <ul style="list-style-type: none"> • Reconfiguration of exits, significantly limiting interstate access to the museum • Increased traffic • Sound and vibration • Removal of mature trees on 12th street 	<p>Benjamin Harrison Home/Presidential Site.</p> <p>The impacts of temporary increases in heavy truck traffic and permanent traffic changes were evaluated for the Assessment of Effects report (see page 156). No temporary increases in heavy truck traffic are anticipated near this property. Permanent traffic changes will result in a total volume rate change of 0.2 vehicle/minute/lane; as a result, permanent traffic changes are anticipated to be minor near this property. Vibration impacts were also evaluated, and vibration impacts are not anticipated due to the distance of the Benjamin Harrison Home/Presidential Site from the undertaking.</p> <p>Tree removal along 12th Street will start east of Alabama Street, which is approximately 585 feet southeast of the Benjamin Harrison Home/Presidential Site and with intervening structures and development within the sight line. Some trees may require removal within the existing INDOT right-of-way south of the Benjamin Harrison Home/Presidential Site boundary; however, there is not dense vegetation here and there is little visual screening from the existing trees.</p> <p>Although there may be minor changes to the Pennsylvania Street exit ramp within the existing right-of-way, INDOT and FHWA do not believe this would adversely affect the integrity of the historic property.</p>
<p>Without question, the reconfiguration of the interstate access to the Presidential Site's neighborhood will have a profound adverse effect on the Benjamin Harrison Presidential Site. The thousands of school children we serve each year will be most immediately impacted, as they get off of their buses on 12th Street and enter the museum from that space directly abutting the interstate itself. While the daily traffic count along the I-65/I-70 corridor adjacent to the museum will continue to total several hundred thousand cars each day, the number that will be able to directly access the museum via the off ramp at Pennsylvania Street will be cut in half as I-70 access is eliminated. This will mount a significant challenge for tourists passing through Indianapolis interested in a brief stop for our 75-minute tour experience potentially doubling or tripling the amount of time required for them to access the museum from the interstate itself.</p>	<p>Construction of the project will have minimal effect on the 12th Street bus drop-off area since interstate mainline work ends one block east, at Alabama Street. The new Pennsylvania Street ramp will be reconstructed next to the Benjamin Harrison Home/Presidential Site boundary, but the work will take place in INDOT right-of-way and conflicts with 12th Street access would be minimal. Short-term closure of Delaware Street may occur during ramp construction. These would be communicated in advance and coordination will occur with staff of the Benjamin Harrison Presidential Site.</p> <p>The Benjamin Harrison Home/Presidential Site will still have ample access from the interstates. Access from SB I-65 will be unaffected. Access from the NB I-65 and from EB I-70 will be smoother and safer on the new Pennsylvania Street ramp. The only affected movement will be from I-70 WB. That traffic can either exit to Michigan Street then turn north on Delaware Street; exit to Rural/Keystone, turn left on 25th Street, then turn left on Pennsylvania Street; or exit to West Street, turn left on 10th Street, then turn left on Delaware Street to reach the facility. The Michigan Street route would add about 1.1 miles to the trip, the Rural/Keystone route would add about 1.2 miles, and the West Street route would add about 1.5 miles.</p>
<p>Mitigation of this as an issue would likely include</p>	<p>Thank you for the mitigation ideas. INDOT is considering all</p>

<p>increased Presidential Site directional signage at the appropriate off ramps, street signage, additional prominent place-making installations on the Pennsylvania Street exit, increasing related signage visibility of the Benjamin Harrison Presidential Site on Delaware and Pennsylvania Streets, and improving visibility of the Presidential Site itself from I-65/ I-70 itself.</p> <p>While INDOT's current plan envisions an "Old Northside Trail" that would complement these efforts, we'd encourage careful thought about how these much needed amenities will require long term maintenance and sustainability without an institutional partner. We are uniquely positioned as a 501 (c) 3 cultural entity to help facilitate these efforts. As things currently stand, as stewards of a National Historic Landmark property and a long-time anchor of the Old Northside Neighborhood, we actively monitor, clean, and pick up debris from 11th to 13th Street along Delaware Street, maintain Talbott Street along the same corridor, and 12th Street and 13th Street between Delaware and Pennsylvania Street. We would be open to a conversation about formalizing this as part of a larger maintenance agreement as future plans may warrant.</p>	<p>mitigation ideas and will provide additional information to consulting parties about those they intend to proceed with in future correspondence and meetings.</p> <p>The Old Northside Trail is only a conceptual idea at this stage. INDOT has not committed to funding or construction of this trail. Your existing efforts to clean and maintain these city streets is appreciated, as well as your openness to conversations about maintenance of possible future amenities.</p>
<p>The pending results of the Section 106 Noise Addendum are also of concern to us, and may reopen additional consideration of adverse impact.</p>	<p>As presented in Section 106 Update Memorandum #6, the existing dB(A) at the Benjamin Harrison Home/Presidential Site is 65.1; the representative build dB(A) is anticipated to be 63.6, for a decrease of 1.5 dB(A). At this time, INDOT is not recommending an Adverse Effect to the Benjamin Harrison Home/Presidential Site.</p>
<p>Apart from direct adverse effects on us, we want to commend the Old Northside Neighborhood's efforts to protect the lush green barrier of trees that they spent significant resources to create and maintain. They have directly invested tens of thousands of dollars and numerous volunteer hours to create the screen that is in place today. The removal of trees and cultivated vegetation will create significant negative visual, audible, and potential air quality impacts to the historically significant neighborhood (especially in the many homes and properties in close proximity to the interstate like the Harrison's residence and the Benjamin Harrison Presidential Site). We strongly believe that the replacement of this screening vegetation needs to be an integral part of the formal remediation for the new interstate.</p>	<p>The Assessment of Effects Report (page 49) acknowledges removal of screening vegetation north of the interstate and adjacent to the Old Northside Historic District does contribute to the Adverse Effect finding for that district. INDOT is investigating the possibility of avoiding impacts to some of the trees as well as replanting trees impacted by construction.</p>
<p>Benjamin Harrison Presidential Site – Charles Hyde – September 12, 2019</p>	
<p><i>At what point will we discuss constructive condemnation and the impact that the interstate work itself will have on adjacent properties like ours? In addition to the long term impacts that were noted in the letter, we recognize that the short term effect of interstate closure will have negative visitation and financial implications for the museum as</i></p>	<p><i>Constructive condemnation is not a term we are familiar with. While INDOT does not typically quantify visitation differences or the financial implications for adjacent businesses/properties during construction, they are very aware there will be impacts during construction.</i></p>

<p><i>well. Is there a standard way that will be quantified or calculated?</i></p>	<p><i>Also, INDOT understands the need to get people downtown and has made significant progress toward this in the planned construction project. Rather than perform the work under complete closure of the interchange, instead access to downtown will be maintained. Specifically, the I-70 to Pennsylvania Street exit ramp and the C-D exit ramps will be open through most of the construction timeframe. Also, we anticipate the Illinois, West, and Washington Street exits will remain open during construction.</i></p> <p><i>We are currently preparing a Transportation Management Plan to minimize traffic impacts during construction. That will include a component for informing and receiving feedback from major stakeholders as the work is planned and executed. You can expect further communication on this in the coming months.</i></p> <p><i>INDOT is also in the process of compiling the comments received on the effects report and will take all of them into consideration.</i></p>
<p>Advisory Council on Historic Preservation – Sarah Stokely – August 9, 2019</p>	
<p>Thank you, Kia, for this meeting invite. Mandy Ranslow will follow up with you regarding her participation with this meeting. I will be out of the office on this day.</p>	<p>Thank you for the information.</p>
<p>Windsor Park Neighborhood Association – August 14, 2019</p>	
<p>We would like a hard copy mailed to:</p> <p>Windsor Park Neighborhood Assoc., Inc. 1429 Brookside Ave Indianapolis, IN 46201</p>	<p>A hard copy of the Assessment of Effects Report was mailed to this address on August 14, 2019.</p>
<p>HUNI – Garry Chilluffo – August 29, 2019</p>	
<p>Sorry Kia. I spaced this one. It didn't get on my calendar. I think you send out notes from meeting? I can follow up then.</p>	<p>A pdf copy of the meeting presentation was sent to consulting parties on August 30, 2019. Meeting minutes were sent on September 16, 2019.</p>
<p>North Square Neighborhood Association – Jordan Ryan – August 29, 2019</p>	
<p><i>It looks like I'll have to call in rather than attend in person today. Is it possible to get any visuals/presentation attachments emailed to me at the time of the meeting?</i></p>	<p><i>A pdf copy of the meeting presentation was sent to Ms. Ryan prior to the meeting.</i></p>
<p>North Square Neighborhood Association – Jordan Ryan – September 10, 2019</p>	
<p>The North Square Neighborhood Association (NSNA) supports and echoes the mitigation suggestions of both the neighborhoods surrounding the North Split and the Rethink 65/70 Coalition for the I-65/I-70 North Split Interchange Reconstruction Project proposal.</p> <p>NSNA supports the following mitigation requests:</p> <ul style="list-style-type: none"> • Improve the local street and pedestrian grid so local traffic can reach destinations without using the interstate • Integrate the greenway system within current dead zones along the interstate 	<p>See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” page 41 regarding design-related mitigation requests.</p> <p>Federal funding for interstate highway projects can be used for design-related mitigation, but there is no provision to “bank” this money for ongoing maintenance. INDOT shares the concern for long-term maintenance of CSS components and is exploring options to minimize maintenance needs and/or to engage partners to support a higher than ordinary degree of maintenance if required. These issues are still being explored.</p>

<ul style="list-style-type: none"> • Incorporate wide sidewalks and traffic buffers as well as safe and consistent lighting for all underpasses • Replant all slopes, embankments, and retaining walls with dense vegetation <p>And most importantly, mitigation funding should be reserved for maintenance. INDOT's right-of-way should be maintained by INDOT, which has historically not been the case. We want to see a maintenance fund established by INDOT to maintain their own ROW instead of the continual burden on neighborhoods to mow, weed, and pick up trash. Additionally, we would like to see some mitigation funding made available for the other CSS opportunities, depending on the priorities of the neighborhoods surrounding the North Split.</p>	
<p>Keep Indianapolis Beautiful, Inc. – Joe Jarzen – August 29, 2019</p>	
<p>Unfortunately I cannot attend today. I look forward to any updates you will provide afterward, and if there is any follow-up I need to do after the meeting.</p>	<p>Thank you for the information. A pdf copy of the meeting presentation was sent to consulting parties on August 30, 2019. Meeting minutes were sent on September 16, 2019.</p>
<p>Keep Indianapolis Beautiful, Inc. – Joe Jarzen – August 30, 2019</p>	
<p><i>I wondered if I could get more information on the extent of the impact on the trees along Davidson. Do you know yet how many would be impacted? I realize the trees themselves are not historic, but their removal impacts the district.</i></p> <p><i>Also, are the walls that are proposed in those before and after photographs, particularly by the Morris-Butler House required or only showing the impact if walls were installed? I thought the proposed option allowed for more of a slope in this area.</i></p>	<p><i>For the Section 106 effects assessment we assumed all the trees would be removed along Davidson. It may be possible to save some trees and/or replant trees there after construction. Something we stressed at the meeting was just because we may have recommended a No Adverse Effect finding for a district under Section 106, it did not mean there was not an impact to the community. Although the tree removal will be an impact to the community, we did not feel that the trees (as they exist now) provide enough screening of the interstate such that their removal would alter the characteristics of the district that qualify it for inclusion in the National Register and diminish its historic integrity. There is additional information in the Effects Report on INDOT's INSCOPE website as well.</i></p> <p><i>A wall, similar to the size and scale as those in photographs, will be required along both sides of I-65 west of the interchange. The walls we have drawn in there now are approximately 10-12 feet tall with the remainder as a vegetated slope. If during the CSS process, we get feedback that residents would prefer a flatter space at the bottom, the wall would need to be taller.</i></p>
<p>Keep Indianapolis Beautiful, Inc. – Joe Jarzen – September 11, 2019</p>	
<p>On behalf of Keep Indianapolis Beautiful (KIB), I wish to submit these comments regarding the Section 106 finding for the I-65/70 North Split Project (Des. Number (Nos.) 1592385 & 1600808). Specifically, KIB wishes to share additional information regarding the impact of the project's construction on a significant investment of trees KIB and City have within the Area of Potential Effect, focusing on 433 trees along Davidson Street for</p>	<p>Information regarding the assessment of the existing trees along Davidson Street is appreciated. It is anticipated this vegetation will need to be removed as part of the project. However, as part of the CSS process, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction. The project team will solicit KIB input directly regarding tree species and size selection and watering when additional details related to</p>

illustrative purposes. KIB submits that the removal of all of these trees would have an adverse effect due to the aesthetic and environmental reasons, which would only improve over time if preserved. While the loss of some trees is unavoidable, KIB hopes more may be preserved, and that replacement is based on the basal area.

While KIB recognizes that the trees planted and maintained within the area scope are not considered heritage trees, their presence does provide key landscaping, aesthetic and environmental benefits to the adjacent historic neighborhoods. While all of the trees may not be salvaged, KIB reiterates its key position to preserve as much of the existing canopy as possible, and when trees are removed, that we match and exceed the existing environmental contribution of the trees.

While we do not have specific information on the environmental benefits of all of the trees we planted within the project area, over the course of summer 2019, KIB conducted a study on the trees along Davidson St. This study covered 433 trees, each being native Indiana species, most common in the area are Swamp White Oak, Eastern Redbud and Kentucky Coffeetree. This study utilized iTree Eco Model developed by the U.S. Forest Service, Northern Research Station. The assessment covered vegetation structure, function and value. This study provides an explanation of the health benefits of these trees, which can be representative of the other trees planted within the same timeframe in this area. It does not cover mature trees.

We would be willing to share more information as it is needed, but these comments share a few highlights the assessment.

1. Pollution removal: 50.22 pounds/year
 - a. Removal of O3, CO, NO2, SO2 and PM2.5 will improve air quality which has reciprocal impacts on human health, damage to ecosystem processes and reduced visibility.
2. Carbon Storage: 8.335 tons and Carbon Sequestration 1,393 pounds
 - a. Storage of and sequestration of carbon (from CO2) helps fight the impacts from fossilfuel power sources, prevalent along the interstate.
 - b. Total carbon storage is equivalent to 4.5 times as heavy as a car.
 - c. Sequestration is two times the CO2 emissions of a typical passenger vehicle assuming about 22mpg and 11,500 miles/year
3. Oxygen Production: 1.857 tons/year

project design and clear zones have been defined.

<p>4. Avoided runoff: 1.714 thousand cubic feet/year</p> <p>a. Surface runoff is a concern as it contributes to the pollution of streams, rivers, underground water and other waterways. This water was captured by the trees, keeping out of the streets and sewers.</p> <p>b. Total amount avoided in 30 years would approach filling an Olympic sized swimming pool.</p> <p>The cost to replace trees of this size, and guarantee their survival through proper maintenance over several years is sizeable. KIB has a high survival rate because it plants 1-2” caliper size trees and waters them for a minimum of three years. Replanting trees of this size and guaranteeing their survival would be both expensive and difficult to accomplish.</p> <p>KIB recommends the preservation of as many of these maturing trees as possible to retain as much of these environmental benefits as possible, and lessen future costs of replacement. This would also allow increased investment into expanding the green infrastructure within the project area.</p> <p>One method of preserving as many as possible is clarifying the construction clear zone. How would the preservation of trees be considered while defining this zone? What is really needed, are there ways to work around and can it be flexible according to each specific location, particularly where there are trees that could be salvaged (most likely on the flat surfaces, not the slopes up to the highway).</p> <p>When replacement does occur, KIB recommends number of trees replaced is based on total basal area. Basal area is the average amount of an area occupied by tree stems. It is defined as the total crosssectional area of all stems in a stand measured at breast height, and expressed as per unit of land area (typically square feet per acre).</p>	
<p>Old Northside Neighborhood Association – Dan Mullendore – September 3, 2019</p>	
<p>I believe that the Consulting Parties Meeting of August 29, 2019 did not have a representative from the Old Northside present and I think this was just an unfortunate set of circumstances.</p> <p>As one of the few neighborhoods with an “Adverse Impact”, we believe our input is critical.</p> <p>Currently the northern side slope between College Avenue and Alabama St is heavily wooded. This was a project initiated by the Old Northside Neighborhood Association many years ago in cooperation with and permission from INDOT to mitigate the impact of the interstate on the</p>	<p>It is anticipated this vegetation will need to be removed as part of the project. However, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction. Details related to project design and clear zones are being defined so that options can be better understood. The concern for adequate screening of the Old Northside will be a major consideration, along with the points regarding slopes, retaining walls, and strategic use of shrubbery.</p> <p>INDOT shares the concern for long-term maintenance of CSS components and is exploring options to minimize maintenance needs and/or to engage partners to support a</p>

neighborhood. Tens of thousands of dollars and numerous volunteer hours were spent on trees and maintenance to create the screen that is in place today. The removal of this screening vegetation will create significant negative visual, audible, and air quality impacts to our historic neighborhood, particularly homes and properties in close proximity to the interstate. We strongly believe that the replacement of this screening vegetation needs to be an integral part of the contract documents for the new interstate.

The replacement of the screening vegetation should be based on the following principles:

1. New vegetation should have the same or more screening benefit as current vegetation on an immediate basis; the neighborhood should be “made whole” on its investment and the screening benefits from the day the ribbon is cut on the new interstate.
2. Trees should be a variety of mature evergreen and shade trees to ensure adequate screening on a year-round basis.
3. Design and configuration of side slopes, embankments, and retaining walls should optimize the viability and sustained growth of a healthy stand of mature trees and screening vegetation.

The “North Split Projects Elements – Side Slope Treatment,” as proposed in the latest CSS presentation, does not propose a replacement consistent with these principles. Side Slope options B, C, D, E, F, H are indicated for the segment of interstate directly adjacent the ONS. We believe options B, C and D are only acceptable with substantial additional trees starting at street level and continuing most of the way up the slope with screening shrubbery directly in front of any wall. Options E and H might be acceptable with sufficient screening and the addition of walks or multi-use trails. Option F might be acceptable with sufficient tree plantings on the terraces.

Without an idea of how much space is left between Central Avenue and Alabama Street, it is hard to say what will be acceptable. Depending on the width, different areas might need different treatment.

Other considerations to keep in mind in the design of a replacement screening solution would include:

- A small as possible retaining wall element to make a fence unnecessary at street level.
- Some slope in the embankment to make camping difficult.
- Ongoing maintenance (mowing and litter removal) by DOT crews.
- Limited shrubbery to make hiding spots or camping

higher than ordinary degree of maintenance if required. These issues are still being explored.

<p>spots difficult. The development of an appropriate solution to this loss of important screening vegetation is of primary importance to the ONS. We view this as more than simple “mitigation” - it is an essential existing condition and element of the project that must be replaced in-kind and whose beneficial impact on our neighborhood must be preserved in any future design and reconstruction of the interstate.</p>	
<p>The pending the results of the Section 106 Noise Addendum are also of great interest and concern to our neighborhood and we look forward to further engagement and discussions on that matter.</p>	<p>As presented in Section 106 Update Memorandum #6, the representative existing dB(A) at the Old Northside Historic District is 70.4 dB(A); the representative build dB(A) is anticipated to be 66.7, for a decrease of 3.7 dB(A). The range of noise changes within the district was -5.8 to +0.3 dB(A). The Traffic Noise Barrier Addendum also recognizes that a noise barrier, if installed, along the north side of I-65 (NB4) would contribute to the Adverse Effect to the historic district.</p>
<p>As advanced by our participation in and coordination with the Rethink 65/70 Coalition, the ONS neighborhood is also concerned about the connectivity and underpass design issues and opportunities highlighted in the recent CSS presentations and discussions. We believe that all of these project elements - screening vegetation, noise reduction, connectivity, air quality, and underpass design – are interrelated and represent the key points of interface between the ONS and the interstate, requiring extensive engagement with our neighborhood in order to ensure our concerns are addressed as the project moves forward. We look forward to further discussions with INDOT on how these critical project elements will be addressed in the project’s design and construction.</p>	<p>See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41 regarding connectivity and underpass design.</p>
<p>Fletcher Place Neighborhood Association – Glenn Blackwood – September 5, 2019</p>	
<p><i>Do the projected temporary and permanent traffic changes take into account Bus Rapid Transit?</i></p> <p><i>In particular, do the expected traffic changes for Virginia Avenue (A15-A17) during and following construction anticipate the impact of the Red Line rapid transit buses stopping at 10 minute intervals at multiple stations between East Washington and Woodlawn? As indicated, Virginia Avenue is two lanes each way. There is not a dedicated lane for BRT.</i></p>	<p><i>We are aware of Red Line and other planned BRT lines and have considered them in our planning. All three BRT lines are included in the traffic model we use for analysis. More importantly, we have been coordinating directly with IndyGo and will continue to do so as the project moves through the construction phase.</i></p> <p><i>More specifically, the North Split project will have no permanent impacts to any part of the Red Line, including the section on Virginia Avenue. There will be temporary traffic impacts on local streets throughout the downtown area during construction, and we will work with IndyGo to minimize impacts to transit routes, especially the BRT routes.</i></p>
<p>Chatham Arch Neighborhood Association – Shawn Miller – September 5, 2019</p>	
<p>Thanks for returning my call this yesterday in regard to the Section 106 Negative Impact Report for the I65/70 North Split Project. Chatham Arch is a neighborhood of roughly 450 households and I am the elected President of the Neighborhood Association, so represent not just myself in this response but the entire Neighborhood. As probably the most negatively affected neighborhood by</p>	<p>Participation of the Chatham Arch neighborhood in the Round 2 CSS Workshop on August 27 is appreciated. This was one of a series of workshops held throughout the community during July and August to present a series of CSS concepts for public input. As with the other workshops, the content of the August 27 workshop was driven by the objectives of the CSS process.</p>

<p>this project, we were disappointed that this information was not presented at the CSS#2 meeting on August 27th where many of our neighbors made the effort to attend; and that we are being given so little time to respond to this Report.</p>	<p>The Section 106 process is a federally mandated process that must be completed separately from the CSS process. In order to meet the specific requirements of the Section 106 process, it must be distinct from the CSS process.</p> <p>As a part of the Section 106 process, a copy of the Assessment of Effects Report was provided to all consulting parties on August 9, 2019, with a 30-day response time. This is the standard comment period length for Section 106 documents.</p>
<p>Additionally we are surprised the only illustration provided is clearly drawn to minimize the impact this taller and closer bridge will have on our Historic Neighborhood. I realized at the meeting that many people are hopping mad about this project design and question the sincerity of INDOT and HNTB in being transparent and forthcoming about this design- and now I know why. Presenting a slanted view of what this will look like does really no one any favors and simply reinforces the overall feeling that INDOT and HNTB care little about how this design will impact and affect this important area of downtown Indianapolis.</p>	<p>The illustration represents the proposed design accurately based upon the current level of design development. Specifically, the horizontal and vertical alignment of the proposed bridge, walls, and grading was imported directly from the engineering design software. The existing apartment building was modeled directly from three-dimensional topographical data collected by licensed land surveyors. The orientation of the view was matched to a photo taken on-site by a project team member standing on the sidewalk on the east side of College Avenue.</p>
<p>Finally, your report does not provide information on the impact of the sound and vibration both during construction and when fully built. The lack of any sound impact report is simply unacceptable. The impact of the additional sound and vibration is perhaps the greatest concern to our residents because sound and vibrations coming off this taller bridge will cascade across a much larger segment of the neighborhood. Interstate sound is a very real negative to the quality of life and real estate value of any area, let alone an historic district. The impact of this design will not only negatively affect the adjacent properties, but most likely a good chunk of the entire Chatham Arch Neighborhood.</p>	<p>As indicated on page 9 of the Assessment of Effects Report, “effects from noise and noise barriers, if added to the project, will be discussed in an addendum to be submitted at a later date. Recommended effect findings may change when effects from noise and noise barriers are analyzed.” This was also emphasized at the consulting party meeting on August 29, 2019.</p> <p>As presented in Section 106 Update Memorandum #6, the representative existing dB(A) at the Chatham Arch Historic District is 66.3 dB(A); the representative build dB(A) is anticipated to be 64.1, for a decrease of 2.2 dB(A). With a noise barrier, there is a predicted decrease of 4.6 dB(A) to 61.7 dB(A). The range of noise changes within the district was -3.5 to 0 dB(A) without a noise barrier. The Traffic Noise Barrier Addendum to the Assessment of Effects Report also recognizes that a noise barrier along the south side of I-65 (NB5) would contribute to the Adverse Effect to the historic district.</p>
<p>While we appreciate that INDOT is prepared to try to mitigate these impacts with additional plantings of mature trees along the slope and sound barriers along the interstate itself- both of which are surely the absolute minimum things that must be done- and your statement that INDOT is prepared to go beyond the physical improvements to try and make this more palatable to the community-we are at a bit of a loss to find some other way INDOT can overcome the very real negative impacts of this project. Web Sites or Walking Tours (both of which we already have) as you suggested simply will not do it. A much larger effort must be made by INDOT to</p>	<p>This impact is reviewed for all historic districts and properties in the Assessment of Effects Report. A copy of the Effects Report was provided to all consulting parties on August 9, 2019. Information regarding the methodology and the results are presented in Appendix A: Traffic Analysis. Specific information for Chatham Arch is provided on pages A-10 and A-11, with the conclusion on Page A-11 that the temporary heavy truck increase is not anticipated to affect the integrity of the historic district.</p> <p>Provisions will be included in the construction contract to document existing conditions and monitor the condition</p>

<p>compensate this Historic District for the very real negatives to our property values that this project will cause. A much more valuable action would be the repaving some of our streets that are sorely in need of such; and/or will bear more traffic as a result of this project during the construction phase or even thereafter. This would be one recommendation we would make initially. We look forward to working with you as time progresses to further explore how INDOT can help to mitigate the very real damage this will cause our neighborhood.</p>	<p>during and after construction. The contractor will be responsible for damage due to their construction operations.</p> <p>INDOT will consider all mitigation ideas as the Section 106 process moves forward.</p>
<p>Several neighbors have been upset by the height of this fly over bridge, and have suggested that INDOT needs to explore another less impactful solution- possibly moving the Delaware Street Ramp to the middle of the Interstate so it doesn't need to fly over to eliminate "the weave" - could resolve this less obtrusively.</p>	<p>Moving the Delaware Street ramp to enter from the center rather than the edge would have created a left-side merge, which is contrary to current practice since it has been shown to be a safety issue. Improving safety is one of the primary objectives of the project. It would have also required the west leg of the interchange to be wider, contrary to the objective of keeping the interstate as narrow as possible at that location. More importantly, the same elevation would still be required for the mainline ramp from I-65 to I-70 to pass over the other two levels.</p> <p>This demonstrates the complexity in interchange design. Minimizing the height of the interchange, especially adjacent to neighborhoods, was an objective in developing the new configuration for the North Split. The challenge was how to best balance all competing objectives while still meeting the needs the interchange must serve. The proposed alternative was the most effective to accomplish that.</p>
<p>As a personal aside, I and many others have been down here trying to make this forgotten little area a better place to live-which has benefitted the entire city, and in turn has benefitted the entire state. A City is not much of a City with a rotten core, and a State is not much of a State with a rotten Capital City. A big part of the reason this area was so dilapidated and forgotten was the fact that this interstate was cut into what was one of the finest (and clearly most historic) areas of Indianapolis. It has taken 35 years for us to make this area desirable again. For INDOT to double down on this horrible design that divided and isolated the area is extremely disappointing. To be frank when I visit other cities that have placed the quality of life above that of expediency or cost, I am embarrassed to live in this State. It seems no matter how hard we work to improve things, State Government cares little for the actual citizens of our State Capital. For the Design team to say "Gee we have listened here-we were going to expand the thing outward with cliff like walls all the way up to the right of way- work would already be underway (if it weren't for you guys)" -which would have literally destroyed these lovely neighborhoods we have all worked so hard to restore, just rubs me the wrong way. This is an opportunity here to do something bold and exciting, and</p>	<p>INDOT's objective in the North Split project has been to evaluate this project carefully to find the best balance of meeting the region's mobility needs and minimizing impacts to the community. A review of potential downtown concepts is presented in the "System-Level Analysis of Downtown Interstates." A review of alternative configurations is provided in the "Alternative Screening Report." These reports are available on the project website – northsplit.com. The result is a layout that provides most of the movements that currently exist, with greatly improved safety and a smaller footprint for the interchange.</p> <p>The CSS process currently underway has focused on connectivity and enhancements at a neighborhood level.</p>

<p>unfortunately that opportunity is being lost. I don't see anything bold or exciting about this design. I'm pretty certain this project isn't going to end up on your homepage along with those stunning bridges you have designed.</p> <p>This needs to change if we are to become the world class city we publicly have been striving for. Proceeding with this project as designed currently is simply unacceptable to many of us and forever relegates the City of Indianapolis to the backwater second tier City most of the rest of the country (evidently correctly) views us as. Certainly, we can do better than this.</p>	
Chatham Arch Neighborhood Association – Shawn Miller – September 6, 2019	
<p><i>OK now that this deadline has been extended, was my letter in the proper format? do we need to be asking for specific things now and if not now then its too late? Sorry this is a first for us so new territory here.</i></p>	<p><i>Yes, your letter was fine. There is no specific format needed for comments. We will discuss mitigation ideas at our next meeting which will likely be in October, so you don't need to have everything now.</i></p>
Indianapolis Historic Preservation Commission – Meg Purnsley – September 6, 2019	
<p><i>At approximately 2:30 p.m. on September 6, 2019, Kia Gillette of HNTB spoke to Ms. Meg Purnsley from the Indianapolis Historic Preservation Commission. Ms. Purnsley indicated she has received phone calls about the project and asked if it would be possible to extend the comment period for the Historic Property Effects Report.</i></p>	<p><i>The comment period was extended to September 11, 2019.</i></p>
Indianapolis Historic Preservation Commission – Meg Purnsley – September 9, 2019	
<p>According to your report, you have identified a total of 51 National Register listed or eligible resources potentially affected by the North Split project. Of those 51 resources:</p> <ul style="list-style-type: none"> • You determined there are 3 “Adverse Effect Findings”: <ol style="list-style-type: none"> 1. Old Northside Historic District 2. Morris Butler House 3. Chatham-Arch Historic District • You determined 22 resources have “No Effect Findings” • You determined the following resources to be NRHP-eligible: <ol style="list-style-type: none"> 1. 8 individual resources 2. 1 bridge, and 3. 3 districts • And, you determined there are 26 “No Adverse Effect Findings” including the following NR historic areas located within locally protected historic areas under the jurisdiction of the Indianapolis Historic Preservation Commission (per I.C. 36-7-11.1) adjacent to the project area described in the undertaking: <ol style="list-style-type: none"> 1. St. Joseph Neighborhood Historic District 2. Massachusetts Ave Commercial Historic District 3. Lockerbie Square Historic District 	<p>After considering the information in the Assessment of Effects Report, Section 106 Update Memorandum #6, and the Traffic Noise Barrier Addendum to the Assessment of Effects Report, there could be up to six recommendations of “Adverse Effects” depending on the results of the noise barrier public involvement:</p> <p>Old Northside Historic District Morris Butler House Chatham-Arch Historic District Saint Joseph Neighborhood Historic District Massachusetts Avenue Commercial Historic District Lockerbie Square Historic District</p> <p>As a result of this change, there could be 22 No Effect recommendations, and 23 No Adverse Effect recommendations.</p>

<p>4. Cottage Home Historic District 5. The Wyndham Apartments 6. Pierson-Griffiths House (also known as the Kemper House)</p>	
<ul style="list-style-type: none"> • Consider alternatives to the proposed retaining walls and/or unnecessary height at the proposed retaining walls • Explore more appropriate materials and treatments for the proposed retaining walls • Increase setbacks between historic resources and the proposed lane expansions • Increase vegetation and landscape screening/buffering along embankments and slopes immediately adjacent to the historic areas and take measures to preserve existing landscaping in these areas • Provide appropriate lighting opportunities at underpasses • Offer insulation/sound mitigation improvements to property owners of historic resources most impacted by the undertaking • Consider the addition of areas for public art along INDOT right-of-way 	<p>Most of the points noted are being actively considered or pursued as part of the CSS process currently underway. See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41 for additional detail.</p> <p>Section 106 Update Memorandum #6 documents the results of the noise analysis for historic properties and the Traffic Noise Barrier Addendum to the Assessment of Effects Report documents the possible reasonable and feasible locations of noise barriers. Input from benefitted noise receivers will be gathered before a decision on the construction of a noise barrier is made.</p>

Lockerbie Square Peoples Club – Christy Norris – September 10, 2019

<p>Lockerbie Square People's Club would like to respond on behalf of The Lockerbie Square Historic District to INDOT's Section 106 report that was shared with Consulting Parties on August 29, 2019.</p> <p>Home to famous Hoosier poet James Whitcomb Riley, Lockerbie Square was Indianapolis' first historic district on the National Register of Historic Places. It's a vibrant neighborhood with tree-lined cobblestone and brick streets and renovated houses - from cozy cottages to mansions mostly built in the late 1800s. Rich with history and charm, these elegant homes were some of the first rescued from demolition and decay that was brought on by a variety of factors, not the least of which was the building of the interstates in the first place. Today the residents have great concern about the potentially significant impact of rebuilding the interstates and respectfully disagree with the designation of "No Adverse Effect" for Lockerbie Square in INDOT's Section 106 report.</p> <p>Having the roadbed come 5' closer and the bridges 3, 6 and 8 feet taller is an increased intrusion and is undesirable, but our concerns lie even more profoundly with the removal of vegetation and the impact of sound and vibration, as well as the impact of increased traffic. These aspects of living beside 1-65 & 1-70 are concerns today. When the interstates are taller and closer and more vehicles exiting into our neighborhood, we</p>	<p>As documented in the Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the historic district. The vegetation on the Michigan Street exit ramp/Davidson Street is considered non-historic and does currently provide substantial screening of the interstate (see Assessment of Effects Report on page 70). It is anticipated this vegetation will need to be removed as part of the project. However, as part of the CSS process, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction. The roadway will be a maximum of 5 feet closer near Ohio Street, which is over 600 feet from the historic district with several buildings in the existing sight line. In the area where the interstate is nearest the historic district, the edge of pavement will not be any closer to the district than it is now. The original No Adverse Effect finding was made because the proposed conditions were not substantially different from the existing intrusion of the interstate. Based on this information, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of the Lockerbie Square Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT</p>
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<p>believe that these issues will be an even greater impact on our historic district. We would like more detail on your "No Adverse Effect" findings to understand the logic applied to that determination.</p>	<p>continues to recommend a finding of No Adverse Effect for this historic district.</p> <p>However, as documented in the Traffic Noise Barrier Addendum to the Assessment of Effects Report, if a noise barrier is added along the west side of I-65/I-70 in the vicinity of Lockerbie Square, the recommended effect finding for Lockerbie Square would be changed to Adverse Effect. This is due to the visual impact and more substantial intrusion of the noise barrier. At this time, it is uncertain if a noise barrier at this location will be constructed. This determination will be made by INDOT for each possible noise barrier after the public involvement period in order to take into account the views of benefited property owners and residents. The recommended Adverse Effect finding would only be valid if noise barriers are constructed.</p>
<p>Between Michigan and New York Streets on Davidson Street (a major collector/distributor), the neighborhood, partnered with Keep Indianapolis Beautiful (KIB), planted a significant patch of trees over ten years ago. The neighborhood has helped to maintain them and consider this wooded area to be an important asset. The trees are now large enough to not only create a visual barrier but also help with sound and air pollution. The removal of these trees are of great concern.</p>	<p>The vegetation on the Michigan Street exit ramp/Davidson Street is considered non-historic and does currently provide substantial screening of the interstate (see Assessment of Effects Report on page 70). It is anticipated this vegetation will need to be removed as part of the project. However, as part of the CSS process, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction.</p> <p>Although INDOT does not believe the removal of the trees near the Lockerbie Square Historic District will result in an Adverse Effect under Section 106, their importance to the community is recognized.</p>
<p>The Context Sensitive Solution (CSS) process has shown how concerned residents have been about the underpasses. We all recognize that the current underpasses were designed solely for vehicular flow and are dark, damp, very scary places. This is an opportunity to demonstrate how interstates can be designed to reconnect neighborhoods in a positive way ... designing them for safe foot and bike traffic and that they be appealing, inviting and connecting.</p>	<p>Providing improved underpasses, particularly for use by pedestrians and bicycles, has been one of the primary interests expressed by the community in CSS workshops and other meetings held as part of the North Split project. As described in the CSS process, improving the user experience at underpasses will be an objective of the North Split project. See response to "Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019" on page 41 for additional detail.</p>
<p>With the removal of exiting I-70 onto Pennsylvania, a significant portion of the traffic coming to the downtown from the east on a daily basis will use the collector/distributor for North, Michigan, and New York Streets, locally becoming Davidson Street. With the re-routing of Pennsylvania street traffic, combined with the addition of the Bottle Works development (which will include hotels, stores, markets, cinemas and two large multi-story office buildings), traffic using this exit will most definitely increase. The magnitude of this change in traffic has not been reported so that the residents can better understand how their historic resources would be impacted both during and after construction and how the additional volume will be managed upon completion of the project.</p>	<p>The impacts of rerouted traffic resulting from permanent access changes such as restrictions at the Pennsylvania Street ramp are reviewed for all historic districts and properties in the Assessment of Effects Report. A copy of the Effects Report was provided to all consulting parties on August 9, 2019. Information regarding the methodology and the results are presented in Appendix A: Traffic Analysis. Specific information for Lockerbie Square is provided on pages A-13 through A-15. As shown on the table beginning on page A-10, the greatest impact of diversion will be to Michigan Street during the morning peak period. The conclusion on page A-13 is that based on the available traffic forecasts, the change in traffic does not rise to a level that would diminish the district's historic integrity.</p>

<p>Mitigation Efforts:</p> <p>1. Vegetation: Configuration of side slopes, embankments, and retaining walls should utilize the opportunity for planting dense vegetation on wide terraces to maximize the plantings and reduce the height of walls. The replanting of the trees should be as dense as it is currently or more so with a variety of mature evergreen as well as deciduous shade trees to ensure year round protection and providing a visually pleasant experience befitting a National Register District and a Capital City.</p> <p>2. Sound & Vibration: The pending results of the Section 106 Noise Addendum are also of great interest and concern and we look forward to further engagement and discussions to reduce noise generation through design, materials, vehicular controls, including:</p> <ul style="list-style-type: none"> a. Minimizing steep grades on main lines and ramps. b. Delineation of where the "Next Generation" pavement grooving will be applied. c. Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems. d. Soundproofing windows in structures within one block of the interstate. <p>Design road edges for noise containment/deflection:</p> <ul style="list-style-type: none"> a. Specify higher median/edge crash barriers. b. Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible. c. Install dense vegetation along roadway edges and between structures. <p>Repair and reinforce existing historic structures' to withstand vibrations during construction activities which is a significant concern to those who have structures closest to the interstates.</p> <p>3. Bridge Underpasses: The bridges should be designed so that the underpasses:</p> <ul style="list-style-type: none"> a. Incorporate wide sidewalks with separation buffer from traffic b. Be easy to maintain free of graffiti and constructed of durable, longlasting materials. c. Have lighting levels that are uniform and consistent with day or night lighting conditions outside the underpass, not introduce veiling glare or hot' spots, and ideally be reflective rather than direct. Underpass lighting should be variable at approaches and exits to compensate for abrupt change of light levels [exceeding 3:1] at those locations. Daylighting light wells [gaps in overpass structures as currently exist at the three 10th Street overpass bridges] should be incorporated for long underpasses. We do not want the poor light conditions such as that under the Virginia Street parking garage or at 	<p>Most of the points noted are being actively considered or pursued as part of the CSS process currently underway. See response to "Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019" on page 41 for additional detail.</p>
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<p>the Heliport underpass.</p> <p>d. Have no nooks or crannies where people can sleep or hide.</p> <p>e. Have no drainage systems emptying into the pedestrian space.</p> <p>f. Integrate walls into the urban fabric and make them pedestrian scaled (no higher than 8-feet) to minimize or eliminate right-of-way fencing.</p> <p>g. Security camera surveillance</p> <p>We believe that the time, personal labor and a considerable amount of private money that has been invested into the Lockerbie Square Historic District over the years positively impacts our city and state not just in the tax revenue. It also generates cultural and educational amenities that our neighborhood provides to citizens of the city and state and the many visitors that come to our neighborhood every year. We look forward to further discussions with INDOT on how these critical project elements will be addressed in the North Splits construction.</p>	
<p>Indiana Landmarks – Marsh Davis – September 11, 2019</p>	
<p>On behalf of Indiana Landmarks, I offer the following brief comments on Section 106 Effects Report as presented on August 29, 2019.</p> <p>1. Indiana Landmarks properties.</p> <p>As owner of the Morris-Butler House, we concur with the determination of adverse effect due to increased height and width of the interstate immediately to the south of the structure. Of particular concern are increased noise, which already renders the grounds of the property largely unusable for events and programs, and the vibration and potential resulting damage to the load-bearing brick structure. We have great concern about the potential damage that could occur during construction, and we will insist that mitigation include any repairs needed as a result of the project.</p> <p>Of much greater concern is the impact on the Indiana Landmarks Center (former Central Avenue Methodist Episcopal Church) which serves as Indiana Landmarks’ state headquarters and as an event and wedding venue. This property, while not individually listed in the National Register of Historic Places (NRHP), is a contributing resource in the Old Northside Historic District, and it is individually eligible for NRHP listing. Of all properties assessed for potential adverse effect in the North Split project, the Indiana Landmarks Center should have appeared at the top of the list.</p> <p>We understand that the interstate will be 22 feet closer to the building than it is at present and that the roadbed will</p>	<p>The Assessment of Effects Report stated that the undertaking is anticipated to have an Adverse Effect on the Morris-Butler House (see page 145).</p> <p>In the vicinity of the Morris-Butler House, noise from the interstate is expected to decrease from an existing dB(A) of 70.4 to a Representative Build dB(A) of 66.7 (see Section 106 Update Memorandum #6). With respect to vibration, the contractor for the project will be required to prepare a construction Vibration Monitoring and Control Plan. This plan will include pre-construction surveys of historic buildings (including the Morris-Butler House and Indiana Landmarks building), monitoring vibration during construction, post-construction surveys, and keeping the public informed of construction activities known to be a source of vibration. The contractor will also be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties (page 145 of the Assessment of Effects Report). As a result, No Adverse Effects to historic properties from construction-induced vibration are anticipated (page 145). The design-build contractor will be responsible for the cost and repair of any damage to structures caused by the construction work. They shall repair any damaged historic structure in accordance with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p>

<p>be higher. Both will have an adverse visual and aural effect on the property. As with the Morris-Butler House, the Indiana Landmarks Center is a loadbearing brick structure susceptible to damage from vibration that will occur during reconstruction of the North Split and later, due to the proximity of the roadbed when the project is completed.</p>	<p>With regard to the Indiana Landmarks Center (former Central Avenue Methodist Episcopal Church), the procedural requirements of Section 106 are different from those for the Morris-Butler House. The Morris-Butler House was listed individually in the National Register in 1973 while the Indiana Landmarks Center is listed in the National Register as a contributing resource in the Old Northside Historic District, which was listed in 1978. As far as Section 106 is concerned, there is no difference in importance if a building is individually listed or is included as a contributing resource in a district. A historic property is any property that is included in, or eligible for inclusion in, the National Register of Historic Places. National Register-listed or National Register-eligible properties include districts. Because the Indiana Landmarks Center is a contributing building in the Old Northside Historic District, the Indiana Landmarks Center is included in the recommended Adverse Effect finding for that district.</p> <p>As stated in the INDOT Cultural Resources Manual (Part II, Chapter 6, Page 9), individual properties may be evaluated for the National Register in a Historic Property Report IF they are not already listed in the National Register either individually or as part of a historic district. It is unnecessary to evaluate individual properties within historic districts because doing so would not lend them any more importance under Section 106 than they currently possess. It is likely that there are several other properties within the APE that would be individually eligible in addition to the Indiana Landmarks Center, but since they already contribute to historic district, there is no need to evaluate them separately.</p> <p>Please see the comments above at the Morris-Butler House with regard to vibration.</p>
<p>We will seek the following mitigation measures:</p> <ul style="list-style-type: none"> • Repair any damage to the building as a result of construction and widened roadbed. • Add sound-proofing to the Indiana Landmarks Center to allow its continued function as an events center. • Install transparent sound barriers along edge of interstate adjacent to the Indiana Landmarks Center and the Morris-Butler House. <p>Further, during the period of highway reconstruction, Indiana Landmarks anticipates significant revenue loss as the operation of the Indiana Landmarks Center will be impaired by construction. Based on an annual average of net revenues from 2015 to 2019, potential revenue loss could approximate \$200,000 on an annual basis. We will seek mitigation funding to offset revenue loss during period of construction.</p>	<p>The design-build contractor will be responsible for the cost and repair of any damage to structures caused by the construction work. They shall repair any damaged historic structure in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p> <p>The Traffic Noise Barrier Addendum to the Assessment of Effects Report documents the effects to historic properties from possible reasonable and feasible locations of noise barriers. Noise abatement will be done in accordance with the INDOT Traffic Noise Analysis Procedure (2017). Input from benefitted noise receivers will be gathered before a decision on the construction of a noise barrier is made. Factors such as safety and cost will be evaluated during the selection of the type of barrier material.</p> <p>INDOT is considering all mitigation ideas, but does not</p>

	<p>typically provide funding to individual businesses or organizations for impacts during construction. INDOT is open to other possible ideas that could help minimize impacts to Indiana Landmarks or other businesses during construction.</p>
<p>Key to determining adverse effect on these properties and others near the construction site is the “Vibration Plan” to be submitted by the selected contractor. When will this plan be written? By whom? And who approves it? The vibration plan must take into account impact on the Indiana Landmarks Center in addition to those properties identified as adversely affected.</p>	<p>The design-build contractor for the project will be required to prepare the construction Vibration Monitoring and Control Plan. It will be prepared and reviewed and approved by INDOT prior to construction. Consulting parties will be provided the Vibration Monitoring and Control Plan for a 30-day review period. The design-build contractor will be required to respond to consulting party comments. This plan will include pre-construction surveys of historic buildings (including the Morris-Butler House and Indiana Landmarks building), monitoring vibration during construction, post-construction surveys, and keeping the public informed of construction activities known to be a source of vibration. The contractor will also be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties (page 49 of the Assessment of Effects Report).</p> <p>INDOT and FHWA will include specific vibration-related conditions in the Memorandum of Agreement for the project. The design-build contractor will be responsible for the cost and repair of any damage to structures caused by the construction work. They shall repair any damaged historic structure in accordance with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent on property owners allowing pre and post construction surveys of their buildings.</p>
<p>2. St. Joseph Historic District. The St. Joseph Historic District will be adversely affected due to the widening of the interstate (noise, visual detriment) and should be listed among resources in the Adverse Effect category. Properties along 11th Street west of Central Avenue in particular will be affected.</p>	<p>As documented in the Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. After considering the consulting party comments and information above, INDOT believes this intrusion will be substantially greater than the existing intrusion of the roadway because the proposed edge of pavement will be 20 feet closer to the historic district boundary at its northeastern end, the elevation will increase slightly toward the east and will be four feet taller than existing at the Central Avenue bridge, and a retaining wall as much as up to 10-12 feet tall will be installed from east of Alabama Street to the interchange. Therefore, INDOT believes the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.</p> <p>Also, as documented in the Traffic Noise Barrier Addendum</p>

	<p>to the Assessment of Effects Report, if a noise barrier is added along the south side of I-65 near the Saint Joseph Neighborhood Historic District, this visual intrusion would also contribute to the Adverse Effect. This is due to the visual impact and more substantial intrusion of the noise barrier. At this time, it is uncertain if a noise barrier at this location will be constructed. This determination will be made by INDOT for each possible noise barrier after the public involvement period in order to take into account the views of benefited property owners and residents.</p>
<p>3. Assessment of impact boundaries. Indiana Landmarks believes the adverse effect determination should include resources within the locally designated historic districts under the aegis of the Indianapolis Historic Preservation Commission in cases when those boundaries differ from the NRHP district boundaries. The local district boundaries reflect the continuity and unifying physical and social characteristics of the neighborhoods that have been determined through intensely local processes. While that may be beyond the letter of the 106 review requirements, such consideration will indicate a respect for the neighborhoods as they have evolved subsequent to their respective NRHP designations.</p>	<p>For purposes of Section 106, historic properties are defined as those which are listed in or eligible for the National Register of Historic Places. Properties listed in or eligible for the National Register of Historic Places within the North Split Area of Potential Effects were documented in a Historic Property Report submitted for consulting party review on January 8, 2018. An Addendum to the Historic Property Report based on possible temporary heavy truck traffic during construction was sent for consulting party review on September 28, 2018. No comments on historic properties or boundaries were received.</p> <p>In some situations, a resource may also be locally designated by the Indianapolis Historic Preservation Commission. However, local designation does not qualify a property for Section 106 review. In addition, the boundaries of locally designated historic districts are often drawn using different criteria than those which are used for the boundaries of National Register of Historic Places districts.</p>
<p>4. Mitigation Ideas for Adverse Effects. The ideas presented in the Assessment of Effects Report are innocuous. We will seek more substantive and physical mitigation due to the impacts the North Split will have on Indiana Landmarks' properties and the affected neighborhoods. Results of noise and vibration studies are critical in determining appropriate mitigation measures. Concluding the assessment of adverse effect without that data is premature and promises to create future conflicts as the tangible effects of the North Split are realized. We urge HNTB, INDOT and FHWA to make the comment process fluid and not to impose deadlines on comment before studies are complete and fully vetted. Transparency on the undertaking and approval of these studies is imperative.</p>	<p>There are no mitigation ideas presented in the Assessment of Effects Report. General mitigation ideas based on other projects were presented at the consulting parties meeting on August 29, 2019 to get people thinking about the subject since many may be unfamiliar with Section 106 mitigation; however, as was mentioned at that meeting, INDOT is open to other possible mitigation measures.</p> <p>Effects for historic properties are recommendations at this stage. As indicated on page 9 of the Assessment of Effects Report, "effects from noise and noise barriers, if added to the project, will be discussed in an addendum to be submitted at a later date. Recommended effect findings may change when effects from noise and noise barriers are analyzed." This was also emphasized at the consulting party meeting on August 29, 2019. A separate 30-day comment period is being provided for Section 106 Update Memorandum #6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report.</p> <p>No vibration studies are planned during the Section 106 consultation. The design-build contractor for the project will be required to prepare the construction Vibration Monitoring and Control Plan. It will be prepared and reviewed and</p>

	<p>approved by INDOT prior to construction. This plan will include pre-construction surveys of historic buildings (including the Morris-Butler House and Indiana Landmarks building), monitoring vibration during construction, post-construction surveys, and keeping the public informed of construction activities known to be a source of vibration. The contractor will also be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties (page 49 of the Assessment of Effects Report). The design-build contractor will be responsible for the cost and repair of any damage to structures caused by the construction work. They shall repair any damaged historic structure in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p> <p>As presented in Section 106 Update Memorandum #6, the representative existing noise level at the Old Northside Historic District is 70.4 dB(A); the representative build noise level is anticipated to be 66.7, for a decrease of 3.7 dB(A). With a noise barrier, there is a predicted decrease of 10.0 dB(A) to 60.4 dB(A). The range of noise changes within the district was -5.8 to +0.3 dB(A) without a noise barrier. The Traffic Noise Barrier Addendum recognizes that a noise barrier along the north side of I-65 (NB4), if installed, would contribute to the Adverse Effect to the historic district.</p>
<p>Holy Cross Neighborhood Association – Kelly Wensing – September 11, 2019</p>	
<p><i>Just a heads up for Holy Cross comments on the Section 106 report. I am having car troubles and the HCNA response/comments are in draft condition on my computer. I hope to get them to you by 5pm but they may arrive late. I know you already extended the deadline - which I appreciate.</i></p>	<p><i>They don't have to be to me by 5 pm. They can come later tonight or even early tomorrow morning since I know to expect them.</i></p>
<p>Holy Cross Neighborhood Association – Kelly Wensing – September 12, 2019</p>	
<p>Thank you for the opportunity to review the Assessment of Effects Report for the I-65/I-70 North Split Interchange Reconstruction Project. Holy Cross Neighborhood Association (HCNA) is directly impacted by the interstate on a daily basis and we appreciate the opportunity to provide feedback on this report.</p> <p>Holy Cross Neighborhood Association boundaries fall within two of the historic districts highlighted in the report. They are Holy Cross/ Westminster and Lockerbie Square. Six of the replacement bridges fall within the HCNA boundaries. Those replacement bridges are (north to south) Michigan Street, Vermont Street, New York Street, Ohio Street, Market Street, and Washington Street.</p> <p>HCNA takes its relationship with the interstate seriously. In fact, in April of 2015 we expanded our western boundary and adopted area from our old boundary at Pine to the western side Davidson. This placed the entire</p>	<p>For purposes of Section 106 and the Assessment of Effects Report for the North Split project, resources that were assessed for the potential for effects are those that are listed in or eligible for the National Register of Historic Places. As a result, the area under consideration is the area within the boundaries of the Holy Cross/Westminster Historic District (listed in the Indiana Register of Historic Sites and Structures and eligible for the National Register of Historic Places) and the Lockerbie Square Historic District (listed in the National Register of Historic Places). INDOT understands that the boundaries of the neighborhood are more encompassing than those of the National Register district boundaries.</p>

<p>interstate within our boundaries. HCNA has put a lot of work in along this portion of the 65/70 interstate. Neighbors worked on tree plantings and cleared evasive species. We continue to regularly clear trash and mow both sides of the interstate to make certain our gateway is welcoming. This 2015 vote only reinforced that this mass of dirt and concrete would not force a boundary cutting our neighborhood off from downtown.</p> <p>Per the INDOT Section 106 Assessment of Effects Report it has been determined that both of the historic districts in which the Holy Cross Neighborhood Association lies will have “No Adverse Effect”. At the same time you acknowledge that the interstate is an existing intrusion, that the project will not produce a more visible highway, and that the project will not diminish the integrity of the district. In a sense you are correct “No Adverse Effect” above and beyond the already existing adverse effects this interstate already has on our community and quality of life.</p> <p>Here are items that were highlighted in the report as impacting HCNA: Replacement of the bridges at: Washington Street –1 foot taller Market Street –0 feet taller Ohio Street/CSX Railroad New York Street –6 feet taller Vermont Street –3 feet taller Michigan Street –8 feet taller Pavement 5 feet wider 69 feet from the proposed edge of shoulder -3 feet closer Vegetation removal in right-of-way</p> <p>No Adverse Effect Interstate an existing intrusion Both slight visual change will not change the streetscape of the district AND will not be more visible Will not diminish integrity of the district</p>	<p>Thank you for the care and upkeep along the sides of the interstate.</p> <p>As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the historic district. As stated in the Assessment of Effects Report, the proposed undertaking will result in minor impacts to Holy Cross/Westminster Historic District’s setting. As you noted, and as the report notes on page 154, the interstate is an already existing intrusion on the integrity of the setting of the Holy Cross/ Westminster Historic District. The project activities will not make the intrusion more visible within the boundaries of the Historic District, which is the definition of the resource that is used for purposes of Section 106. Under Section 106, the proposed condition is compared to the existing condition. The original No Adverse Effect finding was made because the proposed conditions were not substantially different from the existing intrusion of the interstate. Based on this information, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of the Holy Cross/Westminster Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for this historic district.</p> <p>This accurately portrays the description in the Assessment of Effects Report. The vegetation on the Michigan Street exit ramp/Davidson Street is considered non-historic (see Assessment of Effects Report on page 70). It is anticipated this vegetation will need to be removed as part of the project. However, as part of the CSS process, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction.</p>
<p>We are interested in the road repairs before, during and after the project. Not all drivers will follow designated detour routes. We are going to witness impressive amounts of vehicular and semi trailer traffic cutting through our streets. Highland Ave has not resurfaced for decades – it was listed as an important street to be repaved in the Highland Brookside plan of 1993 and that work was never completed. Highland will not survive the added traffic the 65/70 project will bring.</p>	<p>Traffic impacts are reviewed for all historic districts and properties in the Assessment of Effects Report. A copy of the Effects Report was provided to all consulting parties on August 9, 2019. Information regarding the methodology and the results are presented in Appendix A: Traffic Analysis. Specific information for Holy Cross is provided on pages A-44 through A-46, with the conclusion on page A-46 that the temporary heavy truck increase is not anticipated to affect the integrity of the historic district.</p> <p>Provisions will be included in the construction contract to document existing conditions and monitor the condition during and after construction. The contractor will be responsible for damage due to their construction operations.</p>

	INDOT will consider all mitigation ideas as the Section 106 process moves forward.
Bridge underpasses must be designed with all modes of transportation in mind. They must be safe for pedestrians, bikers, handicapped, and vehicles.	Providing improved underpasses, particularly for use by pedestrians and bicycles, has been one of the primary interests expressed by the community in CSS workshops and other meetings held as part of the North Split project. As described in the CSS process, improving the user experience at underpasses will be an objective of the North Split project.
HCNA would like to go on record to state that these minor changes will impact the visual impact of the interstate. Removing vegetation is a huge negative many of these trees were planted nearly 10 years ago and we have been nurturing them. The positive effect of planting the saplings is finally starting to make a difference in reducing the visual, sound, and air pollution of the interstate. Trees removed must be replaced.	The vegetation along the interstate in this area is considered non-historic and does not provide significant screening. It is anticipated this vegetation will need to be removed as part of the project. However, as part of the CSS process, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction. Although INDOT does not believe the removal of the trees near the Holy Cross or Lockerbie Square Historic Districts will result in an Adverse Effect under Section 106, their importance to the community is recognized.
We agree with the Rethink 65/70 Coalition and we would also like to understand/see: In spite your report that a traffic simulation model concluded traffic changes would not result in adverse effects in historic districts surrounding the North Split, how do the ramp changes affect traffic patterns? The magnitude of those traffic shifts has not been reported so the residents can better understand how their historic resources would be impacted both during and after construction and the likely bottlenecks that will be shifted to other locations. Please provide the data from which the conclusions were derived. There may be improvements to the local street grid that can help mitigate these impacts. And A visual analysis for each historic resource in proximity to the North Split should be provided so residents can accurately determine the visual impact of the interstate embankments and interstate infrastructure on them. This should be conveyed by technical drawings rather than illustrative renderings with distorted perspective. HCNA would like to go on record as agreeing with the remarks and statements within the September 5th response to the Effects Report from Rethink 65/70 Coalition. We also join forces with our neighbors embracing comments from the Lockerbie Square Peoples Club (Sept 8) and Saint Joseph Historic Neighborhood Association.	The impacts of rerouted traffic resulting from ramp changes are reviewed for all historic districts and properties in the Assessment of Effects Report. A copy of this report was provided to all consulting parties on August 9, 2019. Information regarding the methodology and the results are presented in Appendix A: Traffic Analysis. Specific information for Holy Cross is provided on pages A-44 through A-46. As shown on the table beginning on page A-44, the greatest impact of diversion will be to Michigan Street during the morning peak period. The conclusion on page A-46 is that permanent traffic changes are anticipated to be minor near and within this district, and this minor increase is not anticipated to affect the integrity of the historic district's setting. Visual impacts are discussed for each property in the Assessment of Effects Report. Under Section 106, the proposed condition is compared to the existing condition. When assessing effects to historic properties, historians took into consideration how much different the proposed changes were to the existing interstate. If the intrusion appeared substantially different, an Adverse Effect finding was recommended. See response to "Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019" on page 41.
We would like to quote the some of text provided in the 65/70 Coalition letter with a focus on items with our	See response to "Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019" on page 41.

boundaries:

Mitigation Efforts

The Rethink 65/70 Coalition has recommended CSS features such as new pedestrian and bicycle connectivity, new street connections, improved underpass designs that fosters neighborhood connectivity, side slope treatments that include measures to restore and improve existing vegetative buffering, and improvements to noise reduction and air quality. **These CSS proposals need to be included in all Section 106 mitigation measures.**

1. Improve the Local Street and pedestrian grid so local traffic can reach local destinations without getting on the interstate:

- Mill, repave, and restore pavement markings to all streets within the historic districts after construction.
- Repair and/or provide new sidewalk connections to create a connected pedestrian network between neighborhoods and through the interstate.
- Maintain Vermont Street as a vehicular way in addition to improving the underpass for safe, well-lit bicycle/pedestrian facilities.

2. Integrate the Greenway System within current dead zones along the interstate:

- Develop a greenway link along 11 Street to the Davidson Street connector.
- Develop a crosstown greenway link between Martindale Brightwood and the Old Northside, utilizing the interstate bridge crossing College to incorporate an elevated pedestrian connector for the greenway link.
- Ensure the 10th Street Payne Connection between the Indianapolis Cultural Trail and the Monon Trail is equal to or better than existing conditions.

3. All underpasses should be designed to:

- incorporate wide sidewalks with separation buffer from traffic
- Be easy to maintain free of graffiti and constructed of durable, long-lasting materials.
- Have lighting levels that are uniform and consistent with day or night lighting conditions outside the underpass, not introduce veiling glare or hot spots, and ideally be reflective rather than direct. Underpass lighting should be variable at approaches and exits to compensate for abrupt change of light levels [exceeding 3:1] at those locations. Day-lighting light wells [gaps in overpass structures as currently exist at the three 10th Street overpass bridges] should be incorporated for long underpasses. We do not want the poor light conditions such as that under the

<p>Virginia Street parking garage or at the Heliport underpass.</p> <ul style="list-style-type: none"> • Have no nooks or crannies where people can sleep or hide. • Have no drainage systems emptying into the pedestrian space. • Integrate walls into the urban fabric and make them pedestrian scaled (no higher than 8-feet) to minimize or eliminate right-of-way fencing. • Restore the Payne Connection Plaza, murals and custom light fixtures between Bellefontaine and 10th Street. <p>4. Within the historic districts, the design and configuration of side slopes, embankments, and retaining walls should optimize the planting of dense vegetation on wide terraces. Vegetative buffering needs to be equal or better in density and size to existing conditions and should include a variety of mature evergreen and deciduous shade trees to ensure screening on a year-round basis.</p> <p>5. The pending results of the Section 106 Noise Addendum are also of great interest and concern and we look forward to further engagement and discussions to reduce noise generation through design, materials, vehicular controls, including:</p> <ul style="list-style-type: none"> • Minimizing steep grades on main lines and ramps. • Delineation of where the “Next Generation” pavement grooving will be applied. • Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems. • Soundproofing windows in structures within one block of the interstate. <p>6. Design road edges for noise containment/deflection</p> <ul style="list-style-type: none"> • Specify higher median/edge crash barriers. • Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible. • Install dense vegetation along roadway edges and between structures. <p>7. Repair and reinforce existing historic structures to withstand vibrations during construction activities.</p>	
St. Joseph Neighborhood Association – Mark Godley – September 12, 2019	
<p>On behalf of the St. Joseph Historic Neighborhood Association I am submitting the attached comments in response to the Historic Property Effects report. It would almost be easier to list aspects of downtown residents’ lives that are not affected by this massive reconstruction of I65/70. Therefore, the continued and increased involvement of historic and other affected neighborhoods</p>	<p>As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. After considering the consulting party comments and information above, INDOT believes this intrusion will be substantially greater than the existing intrusion of the roadway because the proposed edge of pavement will be 20</p>

<p>in the planning process is vital. I look forward to hearing more about INDOT/Consultant responses to all the comments regarding the Historic Property Effects report.</p>	<p>feet closer to the historic district boundary at its northeastern end. Therefore, INDOT believes the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.</p> <p>Also, as documented in the Traffic Noise Barrier Addendum to the Assessment of Effects Report, if a noise barrier is added along the south side of I-65 near the Saint Joseph Neighborhood Historic District, this visual intrusion would also contribute to the Adverse Effect. This is due to the visual impact and more substantial intrusion of the noise barrier. At this time, it is uncertain if a noise barrier at this location will be constructed. This determination will be made by INDOT for each possible noise barrier after the public involvement period in order to take into account the views of benefited property owners and residents.</p>
<p>The St. Joseph Historic Neighborhood and its' directors appreciate the opportunity to respond to the Section 106 Effects Report.</p> <p>Although I heard the presentation on the 106 methodology for determining adverse impact to historic neighborhood structures I was disappointed to learn that the findings panel excluded residents of historic neighborhoods. It is difficult to imagine St. Joseph Historic Neighborhood as having "No Adverse Effect Findings" given it is adjacent to planned reconstruction of the Delaware St. ramp. The St. Joseph Historic Neighborhood is listed on the National Register of Historic Places (Federal) and is a locally-designated Historic District since 1990. We have many historic properties that back up to the ROW line of the interstate. Many are not new construction.</p> <p>19th century historic structures that are adjacent to the interstate are located at Delaware and 11th, Alabama and 11th, and New Jersey and 11th. With the enlarged interstate footprint and a yet-to-be seen revised Delaware ramp that will incorporate a high flying ramp to 70 East, we are concerned that not enough detail has been provided to properly understand the nature and intensity of the effects to our historic area within the Area of Potential Effects (APE) of the North Split.</p>	<p>According to the Advisory Council on Historic Preservation (ACHP) at https://www.achp.gov/protecting-historic-properties/section-106-process/introduction-section-106: Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies (in this case FHWA) to consider the effects on historic properties of projects they fund. Section 106 gives the ACHP, interested parties, and the public the chance to weigh in before a final decision is made.</p> <p>According to the ACHP, the federal agency identifies who should participate in the review and plans how it will involve the public. There has been a robust consulting party process for the North Split Project, with consulting parties invited to participate in September 2017, and the first consulting parties meeting held in October 2017. It is not feasible to include all neighborhood members as consulting parties, so representatives from each neighborhood, usually presidents of neighborhood associations, are invited to participate and represent their neighborhoods. There have been several neighborhood meetings, CSS meetings, and public meetings which were opportunities for neighborhood residents to learn more about the project.</p> <p>The ACHP web site goes on to say: "The federal agency determines if historic properties may be adversely affected. The agency does so in consultation with other participants in the review." Consulting parties were contacted on August 9, 2019 and notified that the Assessment of Effects Report was available for their review and consultation. The Assessment of Effects Report discusses how the effect findings were determined for each historic property. The email also notified consulting parties of the 30-day period for commenting on the effects report, which was extended to September 11, 2019. In addition, there was a consulting parties meeting on August</p>

	<p>29, 2019 to summarize the results of the Assessment of Effects Report, and to provide a forum for comments on that report.</p> <p>See also “A Citizen’s Guide to Section 106 Review” at https://www.achp.gov/digital-library-section-106-landing/citizens-guide-section-106-review</p>
<p>Of grave concern is the historic brick 10th Street, which restoration was completed just two years ago. We stand to protect our historic resource from increased traffic during construction and with the completion of North Split. As we do not have enough information as to how this will impact the street, we ask this be included in the Section 106 mitigation measures.</p>	<p>No impacts to the brick portion of 10th Street are anticipated as part of the North Split Project.</p>
<p>We also would like the existing Alabama Street underpass to encompass some improvements for overall safety and cleanliness, adding to connectivity with better lighting and efforts to minimize noise, water run off from the roadbed, and discouraging the homeless from camping out in the rafters.</p>	<p>The Alabama Street overpass is the beginning of a very large bridge extending from the east side Alabama Street to the ramp connections of the West Street interchange. Since the focus of the North Split project is the interchange and approaches, this was a logical ending point for the project. As a result, the portion of interstate over the Alabama Street underpass is not a part of the project.</p> <p>That said, the need for the requested changes is recognized, whether part of the project or not, and this comment is duly being noted as part of the current process.</p>
<p>We would like to echo the CSS mitigation efforts outlined by the Rethink Coalition:</p> <p>1. Improve the local street and pedestrian grid so local traffic can reach local destinations without getting on the interstate:</p> <ul style="list-style-type: none"> • Connect 11th Street to Davidson Street as a local cross-town street connector. • Connect the N/S Streets under I-70 between 16th and Roosevelt Ave. • Connect 12th Street to 15th Street as a local cross-town connector • Mill, repave, and restore pavement markings to all streets within the historic districts after construction. • Repair and/or provide new sidewalk connections to create a connected pedestrian network between the historic districts and through the interstate. • We support the recently reported decision of maintaining Vermont Street as a vehicular way in addition to improving the underpass for safe, well-lit bicycle/pedestrian facilities. <p>2. Integrate the Greenway System within current dead zones along the interstate:</p> <ul style="list-style-type: none"> • Develop a greenway link along 11 Street to the Davidson Street connector. • Develop a crosstown greenway link between Martindale 	<p>See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41.</p>

Brightwood and the Old Northside, utilizing the interstate bridge crossing College to incorporate an elevated pedestrian connector for the greenway link.

- Ensure the 10th Street Payne Connection between the Indianapolis Cultural Trail and the Monon Trail is equal to or better than existing conditions.

3. All underpasses should be designed to:

- Incorporate wide sidewalks with separation buffer from traffic
- Be easy to maintain free of graffiti and constructed of durable, long-lasting materials.
- Have lighting levels that are uniform and consistent with day or night lighting conditions outside the underpass, not introduce veiling glare or hot spots, and ideally be reflective rather than direct. Underpass lighting should be variable at approaches and exits to compensate for abrupt change of light levels [exceeding 3:1] at those locations. Daylighting light wells [gaps in overpass structures as currently exist at the three 10th Street overpass bridges] should be incorporated for long underpasses. We do not want the poor light conditions such as that under the Virginia Street parking garage or at the Heliport underpass.
- Have no nooks or crannies where people can sleep or hide.
- Have no drainage systems emptying into the pedestrian space.
- Integrate walls into the urban fabric and make them pedestrian scaled (no higher than 8-feet) to minimize or eliminate right-of-way fencing.
- Restore the Payne Connection Plaza, murals and custom light fixtures between Bellefontaine and 10th Street.

4. Within the historic districts, the design and configuration of side slopes, embankments, and retaining walls should optimize the planting of dense vegetation on wide terraces. Vegetative buffering needs to be equal or better in density and size to existing conditions and should include a variety of mature evergreen and deciduous shade trees to ensure screening on a year-round basis.

5. The pending results of the Section 106 Noise Addendum are also of great interest and concern and we look forward to further engagement and discussions to reduce noise generation through design, materials, vehicular controls, including:

- Minimizing steep grades on main lines and ramps.
- Delineation of where the “Next Generation” pavement grooving will be applied.
- Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems.

<ul style="list-style-type: none"> • Soundproofing windows in structures within one block of the interstate. <p>6. Design road edges for noise containment/deflection</p> <ul style="list-style-type: none"> • Specify higher median/edge crash barriers. • Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible. • Install dense vegetation along roadway edges and between structures. <p>7. Repair and reinforce existing historic structures to withstand vibrations during construction activities.</p> <p>Since we do not know how the interstate changes will affect us and the impact on our historic fabric, we look to the mitigation proposals to lessen the impact on the historic area where we live, work and play. We look forward to further discussions on how this monumental project will affect downtown neighborhoods.</p>	
Cottage Home Neighborhood Association – Jim Jessee – September 9, 2019	
<p>Cottage Home was unfortunately unable to send a representative to the Consulting Parties on August 29, 2019. We do appreciate the opportunity to respond. While the interstate will come only minimally closer to our neighborhood and the bridge over St. Clair is only 3 feet taller, we must still respectfully disagree with the designation of “No Adverse Effect”. The interstate currently infringes upon our neighborhood in a disruptive way and has created a barrier to downtown that disconnects us from the historic structures of Lockerbie Square and Chatham Arch. Since the roadbed is going to be torn down and rebuilt, we would like to see an improvement to its impact on our historic neighborhood rather than being worse than the original damage.</p> <p>Cottage Home is both historically and architecturally significant to Indianapolis and the state. Our neighborhood contains an excellent collection of vernacular dwellings reflective of late nineteenth century workers’ housing. Additionally, a unique collection of residential structures designed by the local architectural firm of Vonnegut and Bohn survive. Cottage Home has long been identified by the Indianapolis Historic Preservation Commission (IHPC) and its staff as an area of local historical significance. A portion of the neighborhood was listed in the National Register of Historic Places in 1990. In 1995, an expanded district was listed in the State Register of Historic Places. Additionally, the IHPC had designated the Ruskaup- Ratcliffe House and Store at 711 and 715 North Dorman Street as an individual site. In the mid-1980s, the 160-home community experienced a restoration boom.</p>	<p>As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the historic district. Under Section 106, the proposed condition is compared to the existing condition when assessing effects. The Cottage Home Historic District is over 450 feet from the interstate and the proposed interstate improvements are not anticipated to result in a more substantial intrusion over the existing condition. INDOT does not believe the changes resulting from the North Split project will diminish the historic integrity of the district. Therefore, INDOT continues to recommend a No Adverse Effect finding for this property.</p> <p>For purposes of Section 106 and the Assessment of Effects Report for the North Split project, resources that were assessed for the potential for effects are those that are listed in or eligible for the National Register of Historic Places. As a result, the area under consideration is the Cottage Home Historic District as listed in the National Register of Historic Places. INDOT understands that the boundaries of the neighborhood are more encompassing than those of the National Register district boundaries.</p> <p>Also for purposes of Section 106, historic properties are defined as those which are listed in or eligible for the National Register of Historic Places. In some situations, a resource may also be locally designated by the Indianapolis Historic Preservation Commission. However, local designation does not qualify a property for Section 106</p>

<p>Cottage Home Neighborhood Association (CHNA) was formed in 1984 in reaction to businesses razing houses in the heart of the residential area. Only about six houses have been lost to fire and demolition since CHNA formed. However, the flood zone greatly slowed the construction of new infill housing until Pogue’s Run was abated. In recent years, a building boom has occurred particularly on the western portion of the neighborhood, near the interstate, heightening the need for a greater barrier between the neighborhood and the interstate and more protection from sound and vibration.</p>	<p>review. In addition, the boundaries of locally designated historic districts are often drawn using different criteria than those which are used for the boundaries of National Register of Historic Places districts.</p>
<p>Mitigation Efforts:</p> <p>1. Vegetation: Cottage Home does not have enough of a tree barrier today. We request many more trees, not the removal of vegetation. Configuration of side slopes, embankments, and retaining walls should utilize the opportunity for planting dense vegetation on wide terraces to maximize the plantings and reduce the height of walls. The replanting of the trees should be dense with a variety of mature evergreen as well as deciduous shade trees to ensure year round protection.</p> <p>2. Sound & Vibration: The pending results of the Section 106 Noise Addendum are also of great interest and concern and we look forward to further engagement and discussions to reduce noise generation through design, materials, vehicular controls, including:</p> <ol style="list-style-type: none"> a. Minimizing steep grades on main lines and ramps. b. Delineation of where the “Next Generation” pavement grooving will be applied. c. Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems. d. Soundproofing windows in structures within one block of the interstate. e. road edges for noise containment/deflection f. Specify higher median/edge crash barriers. g. Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible. h. Install dense vegetation along roadway edges and between structures. i. Repair and reinforce existing historic structures to withstand vibrations during construction activities which is a significant concern to those who have structures closest to the interstates. <p>3. Bridge Underpasses: The St. Clair Street bridge should be designed so that the underpass is similar to the other bridges of the North Split which should have the following:</p> <ol style="list-style-type: none"> a. Incorporate wide sidewalks with separation buffer from traffic b. Be easy to maintain free of graffiti and constructed of 	<p>See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41.</p>

<p>conclusion that the undertaking will adversely impact the Morris-Butler House, Old Northside Historic District, and Chatham-Arch Historic District. We are very concerned about the additional effects of noise barriers, should these be added to the project at a later time, and we understand that the report may be modified by addendum to analyze these impacts.</p>	<p>party review.</p> <p>As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. After considering the consulting party comments and information above, INDOT believes this intrusion will be substantially greater than the existing intrusion of the roadway because the proposed edge of pavement will be 20 feet closer to the historic district boundary at its northeastern end. Therefore, INDOT believes the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.</p> <p>In addition, as documented in the Traffic Noise Barrier Addendum to the Assessment of Effects Report, if a noise barrier is added along the west side of I-65/I-70 in the vicinity of the Massachusetts Avenue Commercial and Lockerbie Square Historic Districts, the recommended effect findings for these historic districts would be changed to Adverse Effect. This is due to the visual impact and more substantial intrusion of the noise barrier. At this time, it is uncertain if a noise barrier at this location will be constructed. This determination will be made by INDOT for each possible noise barrier after the public involvement period in order to take into account the views of benefited property owners and residents. The recommended Adverse Effect finding would only be valid if noise barriers are constructed.</p>
<p>As previously stated, based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places ("NRHP") within the proposed project area; and we concur with the opinion of the archaeologist, as expressed in the Indiana archaeological short report (Schwarz, 06/13/2019), that no further archaeological investigations appear necessary at the proposed project area.</p> <p>If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to DNR-DHP A within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.</p>	<p>If archaeological artifacts are uncovered during project activities, the INDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p>
<p>Massachusetts Avenue Merchants Association – Meg Storrow – September 11, 2019</p>	

<p>Per your report, there are 51 National Register listed or eligible resources potentially affected by the North Split project. An Adverse Effect is defined as “when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association“.</p> <p>You have determined there are three “Adverse Effect Findings”:</p> <ul style="list-style-type: none"> 1 Old Northside Historic District 2 Morris Butler House 3 Chatham-Arch Historic District <p>The Mass Ave Historic District has a contiguous local historic district boundary with Chatham Arch, and therefore should also be considered an “Adverse Effect” finding.</p>	<p>After considering the information in the Assessment of Effects Report, Section 106 Update Memorandum #6, and the Traffic Noise Barrier Addendum to the Assessment of Effects Report, there could be up to six recommendations of “Adverse Effects” depending upon the results of the noise barrier public involvement:</p> <ul style="list-style-type: none"> Old Northside Historic District Morris Butler House Chatham-Arch Historic District Saint Joseph Neighborhood Historic District Massachusetts Avenue Commercial Historic District Lockerbie Square Historic District <p>As a result of this change, there could be 22 No Effect recommendations, and 23 No Adverse Effect recommendations.</p> <p>As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Massachusetts Avenue Commercial Historic District. The existing roadway is an intrusion along the eastern edge of the historic district. In response to consulting party comments that the effect finding for the Massachusetts Avenue Commercial Historic District should be the same as for the Chatham-Arch Historic District, the NRHP boundaries of the Massachusetts Avenue Commercial Historic District and Chatham-Arch Historic District do overlap along Massachusetts Avenue. However, the Adverse Effect finding for the Chatham Arch Historic District is largely based on the substantial intrusion of the proposed project near I-65 and College Avenue, which is adjacent to the Chatham-Arch Historic District’s boundary, but is over 700 feet from the Massachusetts Avenue Commercial Historic District. The proposed roadway will not be substantially different from the existing condition where it is closest to the Massachusetts Avenue Commercial Historic District. Based on the information above, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of the historic district that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for this historic district.</p>
<ul style="list-style-type: none"> 1. Per the National Historic Preservation Act, an increased level of detail is required to “enable informed consideration of avoidance, minimization, or mitigation measures.” 2. A delineation of how, exactly, the proposed plans for the North Split would alter or diminish the integrity of the character-defining features of the impacted historic resources is needed. 	<p>The Assessment of Effects Report provides an analysis of how the proposed plans for the North Split would affect the historic resources within the APE. The Assessment of Effects Report 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. The Des. No. for this project is 1592385.</p>

3. We would like to see more detail on those historic resources that received a “No Adverse Effect Findings” to understand the logic applied to that determination, for example to St. Joseph, Windsor Park and Cottage Home Historic Districts.

4. In spite your report that a traffic simulation model concluded traffic changes would not result in adverse effects in historic districts surrounding the North Split, how do the ramp changes affect traffic patterns? The magnitude of those traffic shifts has not been reported so the residents can better understand how their historic resources would be impacted both during and after construction and the likely bottlenecks that will be shifted to other locations. Please provide the data from which the conclusions were derived. There may be improvements to the local street grid that can help mitigate these impacts.

5. A visual analysis for each historic resource in proximity to the North Split should be provided so residents can accurately determine the visual impact of the interstate embankments and interstate infrastructure on them. This should be conveyed by technical drawings rather than illustrative renderings with distorted perspective.

Additional information is included in the Assessment of Effects Report and Section 106 Update Memorandum #6 in IN SCOPE; see above for information on how to access the detailed reports. The Saint Joseph Neighborhood Historic District is discussed on pages 50-56 of the Effects Report; Windsor Park is discussed on pages 179-181, and Cottage Home is discussed on pages 78-80. As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. After considering the consulting party comments and information above, because the proposed edge of pavement will be 20 feet closer to the historic district boundary at its northeastern end, INDOT believes this intrusion will be substantially greater than the existing intrusion of the roadway. Therefore, INDOT believes the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.

The original No Adverse Effect findings for the Windsor Park and Cottage Home Historic Districts were made because the proposed conditions were not substantially different from the existing intrusion of the interstate. Based on this information, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of these two historic districts that qualify them for inclusion in the NRHP in a manner that would diminish the integrity of the historic districts. INDOT continues to recommend a finding of No Adverse Effect for the Windsor Park and Cottage Home Historic Districts.

The Traffic Analysis documentation, including a table of traffic data for each historic property, is included in Appendix A of the Assessment of Effects Report. As stated in the Report in the analysis of the Massachusetts Avenue Commercial Historic District specifically with regard to traffic, on page 67 of the report, “For most of the streets within or adjacent to this historic district, permanent traffic changes are anticipated to be minor. However, there were three streets with density (total volume rate change) increases over one vehicle/minute/lane. Massachusetts Avenue shows an increase of 1.8 vehicle/minute/lane, Michigan Street shows 2.8 vehicle/minute/lane, and Vermont Street shows 1.8 vehicle/minute/lane. Although these increases may be perceptible, the Massachusetts Avenue Commercial Historic District is a busy commercial area where traffic would be

	<p>expected.”</p> <p>Visual impacts are discussed for each property in the Assessment of Effects Report. Under Section 106, the proposed condition is compared to the existing condition. When assessing effects to historic properties, historians took into consideration how much different the proposed changes were to the existing interstate. If the intrusion appeared substantially different, an Adverse Effect finding was recommended.</p>
<p>Mitigation Efforts</p> <p>The Rethink 65/70 Coalition has recommended CSS features such as new pedestrian and bicycle connectivity, new street connections, improved underpass designs that fosters neighborhood connectivity, side slope treatments that include measures to restore and improve existing vegetative buffering, and improvements to noise reduction and air quality. These CSS proposals need to be included in all Section 106 mitigation measures.</p> <p>1. Improve the local street and pedestrian grid so local traffic can reach local destinations without getting on the interstate:</p> <ul style="list-style-type: none"> • Connect 11th Street to Davidson Street as a local cross-town street connector. • Connect the N/S Streets under I-70 between 16th and Roosevelt Ave. • Connect 12th Street to 15th Street as a local cross-town connector • Mill, repave, and restore pavement markings to all streets within the historic districts after construction. • Repair and/or provide new sidewalk connections to create a connected pedestrian network between the historic districts and through the interstate. • We support the recently reported decision of maintaining Vermont Street as a vehicular way in addition to improving the underpass for safe, well-lit bicycle/pedestrian facilities. <p>2. Integrate the Greenway System within current dead zones along the interstate:</p> <ul style="list-style-type: none"> • Develop a greenway link along 11 Street to the Davidson Street connector. • Develop a crosstown greenway link between Martindale Brightwood and the Old Northside, utilizing the interstate bridge crossing College to incorporate an elevated pedestrian connector for the greenway link. • Ensure the 10th Street Payne Connection between the Indianapolis Cultural Trail and the Monon Trail is equal to or better than existing conditions. <p>3. All underpasses should be designed to:</p> <ul style="list-style-type: none"> • Incorporate wide sidewalks with separation buffer from traffic 	<p>See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41.</p>

- Be easy to maintain free of graffiti and constructed of durable, long-lasting materials.
 - Have lighting levels that are uniform and consistent with day or night lighting conditions outside the underpass, not introduce veiling glare or hot spots, and ideally be reflective rather than direct. Underpass lighting should be variable at approaches and exits to compensate for abrupt change of light levels [exceeding 3:1] at those locations. Daylighting light wells [gaps in overpass structures as currently exist at the three 10th Street overpass bridges] should be incorporated for long underpasses. We do not want the poor light conditions such as that under the Virginia Street parking garage or at the Heliport underpass.
 - Have no nooks or crannies where people can sleep or hide.
 - Have no drainage systems emptying into the pedestrian space.
 - Integrate walls into the urban fabric and make them pedestrian scaled (no higher than 8- feet) to minimize or eliminate right-of-way fencing.
 - Restore the Payne Connection Plaza, murals and custom light fixtures between Bellefontaine and 10th Street.
4. Within the historic districts, the design and configuration of side slopes, embankments, and retaining walls should optimize the planting of dense vegetation on wide terraces. Vegetative buffering needs to be equal or better in density and size to existing conditions and should include a variety of mature evergreen and deciduous shade trees to ensure screening on a year-round basis.
5. The pending results of the Section 106 Noise Addendum are also of great interest and concern and we look forward to further engagement and discussions to reduce noise generation through design, materials, vehicular controls, including:
- Minimizing steep grades on main lines and ramps.
 - Delineation of where the “Next Generation” pavement grooving will be applied.
 - Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems.
 - Soundproofing windows in structures within one block of the interstate.
6. Design road edges for noise containment/deflection
- Specify higher median/edge crash barriers.
 - Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible.
 - Install dense vegetation along roadway edges and between structures.

<p>7. Repair and reinforce existing historic structures to withstand vibrations during construction activities.</p>	
<p>Massachusetts Avenue Merchants Association – Meg Storrow – September 11, 2019</p>	
<p><i>The Riley Area Development Corporation has transitioned to new leadership. The former Executive Director chose not to engage in the North Split process. I am writing to introduce you to Chelsea Humble, who has expressed interest in representing RADC in the North Split process.</i></p> <p><i>Her contact information is: Chelsea Humble, North Mass Program Manager Riley Area Development Corporation 875 Massachusetts Avenue / Indianapolis, IN 46219 317.637.8996 x 204 chelsea.humble@rileyarea.org</i></p> <p><i>She has asked me to introduce you to her and request you add her to the CAC, the Section 106 consulting parties list, and the CSS notification list.</i></p>	<p><i>Ms. Humble was added to the North Split consulting parties list on September 16, 2019.</i></p>
<p>National Trust for Historic Preservation – Elizabeth Merritt – September 11, 2019</p>	
<p>We appreciate the opportunity to participate in the Section 106 review for this project, including the meeting and web presentation on August 29, and to comment on the Assessment of Effects Report.</p> <p>Two Determinations of No Adverse Effect Are Not Supported by the Record. Pursuant to 36 C.F.R. § 800.5(c)(2)(i), we disagree with two of the determinations of No Adverse Effect in the report: The St. Joseph Neighborhood Historic District, and the Indiana Landmarks Center within the Old Northside Historic District.</p> <p>• St. Joseph Neighborhood Historic District The boundary of this historic district will be just six feet (!) away from the proposed edge of the shoulder at its closest point -- 20 feet closer than its current proximity. In addition, the highway will be approximately four feet higher than its current elevation, with a new retaining wall 10-12 feet high (plus Jersey barriers). Effects Report, pp. 51-52. It is difficult to defend the proposed finding of No Adverse Effect for this historic district when other historic properties that are farther away are acknowledged to be adversely affected.</p> <p>The primary rationale in the Effects Report is that this historic district is already adversely affected by the close presence of the highway. But this rationale seems contrary to the requirement under both Section 106 and NEPA to consider cumulative impacts. See 36 C.F.R. § 800.5(a)(1). Cumulative impacts are defined as:</p>	<p>Please note INDOT did not recommend a No Adverse Effect finding for the Indiana Landmarks Center. As a contributing building in the Old Northside Historic District, it would also receive an Adverse Effect finding.</p> <p>As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. After considering the consulting party comments and information above, because the proposed edge of pavement will be 20 feet closer to the historic district boundary at its northeastern end, INDOT believes this intrusion will be substantially greater than the existing intrusion of the roadway. Therefore, INDOT believes the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.</p> <p>As a point of clarification, the historic district is 6 feet away from some proposed sidewalk improvements along Delaware Street near the existing entrance ramp to the interstate, as shown on page 15 of the Assessment of Effects Report. It will</p>

<p>the impact on the environment which results from the incremental impact of the action when added to other <i>past, present,</i> and reasonably foreseeable future actions Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.</p> <p>40 C.F.R. § 1508.7 (emphasis added). We encourage you to reconsider this determination.</p>	<p>not be 6 feet from the interstate mainline. The interstate mainline will be 20 feet closer at the district’s eastern edge. The proposed interstate edge of shoulder will be approximately 55 feet from the historic district boundary at that location.</p> <p>Also, as documented in the Traffic Noise Barrier Addendum to the Assessment of Effects Report, if a noise barrier is added along the south side of I-65 near the Saint Joseph Neighborhood Historic District, this visual intrusion would also contribute to the Adverse Effect. This is due to the visual impact and more substantial intrusion of the noise barrier. At this time, it is uncertain if a noise barrier at this location will be constructed. This determination will be made by INDOT for each possible noise barrier after the public involvement period in order to take into account the views of benefited property owners and residents.</p>
<p>• Indiana Landmarks Center</p> <p>The Assessment of Effects Report appropriately determines that the Morris-Butler House, within the Old Northside Historic District, will suffer potential adverse effects from the project, as it will be just 107 feet from the expanded edge of the shoulder (Effects Report, pp. 145-46). However, the Indiana Landmarks Center is immediately adjacent to the Morris-Butler House (also within the Old Northside Historic District), and it is even closer to the existing highway, as can be seen clearly from the map below:</p> <p>The expanded highway will be 22 feet closer to the Indiana Landmarks Center than the current highway, and the elevation will be six to seven feet higher than the existing road, with a four-foot Jersey barrier on top. In addition, the new retaining wall will be 10-12 feet tall. Like the Morris-Butler House, the Indiana Landmarks Center is a 19th-century brick building. It is irrational and inconsistent to deny the potential adverse effects on the Indiana Landmarks Center while acknowledging those adverse effects to the Morris-Butler House.</p> <p>Furthermore, we share the concerns expressed by Indiana Landmarks that the construction will have a significant financial impact on the organization by interfering with the revenue from rentals of the property for events. (See https://www.indianalandmarks.org/ourhistoric-sites/indiana-landmarks-center-campus.) This needs to be specifically addressed by exploring ways that this adverse economic impact can be both minimized and mitigated.</p>	<p>The Indiana Landmarks Center (former Central Avenue Methodist Episcopal Church) is a significant resource within the Old Northside Historic District. A historic property is any property that is included in, or eligible for inclusion in, the National Register of Historic Places. National Register-listed or eligible properties include districts. Because the Indiana Landmarks Center is a contributing building in the Old Northside Historic District, the Indiana Landmarks Center is included in the recommended Adverse Effect finding for that district. INDOT also recognizes that the Indiana Landmarks Center has been given a rating of Outstanding in the Indiana Historic Sites and Structures Inventory in recognition of the building’s noteworthy architecture and historic significance.</p> <p>INDOT is not denying potential Adverse Effects to the Indiana Landmarks Center. The Morris-Butler House is listed individually in the National Register (listed in 1973), while the Indiana Landmarks Center is not individually listed. It is included in the National Register as part of the Old Northside Historic District, which was listed in 1978. Resources that are individually listed and resources that are listed as part of a district are recognized equally under Section 106. As stated in the INDOT Cultural Resources Manual (Part II, Chapter 6, Page 9), individual properties may be evaluated for the National Register in a Historic Property Report IF they are not already listed in the National Register either individually or as part of a historic district. It is unnecessary to evaluate individual properties within historic districts because doing so would not lend them any more importance under Section 106 than they currently possess. It is likely that there are several other properties within the APE that would be individually eligible in addition to the Indiana Landmarks Center, but since they already contribute to historic district, there is no need to evaluate them separately.</p> <p>In addition, based on the findings of the Traffic Noise Barrier</p>

	<p>Addendum to the Assessment of Effects Report, a noise barrier is planned for the north side of I-65 to Alabama Street, adjacent to the Morris-Butler House. The visual intrusion of this barrier, if installed, would contribute to the Adverse Effect finding for the Old Northside Historic District.</p> <p>According to the Section 106 regulations at CFR 800.5(a)(1), an Adverse Effect “is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner than would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” The characteristics that qualify any property for the National Register relate to a resource’s historic and/or architectural significance. INDOT recognizes the importance of the Indiana Landmarks Center and the need to maintain an income stream from rentals of the building, but strictly speaking, INDOT was unable to evaluate this impact as part of the Section 106 process.</p> <p>Your thoughts and ideas of appropriate minimization and mitigation measures are welcomed and appreciated.</p>
<p>Vibration Effects The Effects Report lists the following historic properties that are located within 140 feet of the proposed construction activities and thus potentially susceptible to vibration impacts:</p> <ol style="list-style-type: none"> 1. Old Northside Historic District 2. Saint Joseph Neighborhood Historic District 3. Chatham-Arch Historic District 4. Massachusetts Avenue Commercial Historic District 5. Lockerbie Square Historic District 6. Wyndham 7. Pierson-Griffiths House 8. Calvin I. Fletcher House 9. Cole Motor Car Company 10. Delaware Court 11. Morris-Butler House 12. Holy Cross/Westminster Historic District <p>Effects Report, pp. B-5 to B-6.</p> <p>For the reasons discussed above, the Indiana Landmarks Center (formerly the historic Central Avenue Methodist Episcopal Church) needs to be added to this list, because it will be well within 140 feet of the proposed construction activities.</p> <p>The Effects Report does apply the appropriate vibration limits for purposes of the vibration monitoring protocol: 0.2 inches/second PPV for Fragile structures (non-engineered timber and masonry buildings), and 0.12 inches/second PPV for Extremely Fragile structures</p>	<p>The Indiana Landmarks Center is included in the list. The list includes structures within historic districts within 140 feet of the proposed construction. The Indiana Landmarks Center is a contributing structure to the Old Northside Historic District and is within 140 feet of the proposed construction activities.</p> <p>The design-build contractor for the project will be required to prepare the construction Vibration Monitoring and Control Plan. It will be prepared and reviewed and approved by INDOT prior to construction. Consulting parties will be provided the Vibration Monitoring and Control Plan for a 30-</p>

<p>(buildings, ruins, ancient monuments). Effects Report, p.B-6 (Table 2). However, the Effects Report assumes that a vibration monitoring protocol will magically ensure that no adverse effects will occur. Effects Report, p.B-7. This seems unrealistic. Things can go wrong. Therefore, it will be important to ensure that these specific limitations are spelled out in the Section 106 agreement for the project, and that <i>all</i> historic properties within 140 feet are properly monitored and documented, with an enforceable commitment to repair any damage caused by construction vibration.</p>	<p>day review period. The design-build contractor will be required to respond to consulting party comments. INDOT and FHWA will include specific vibration-related conditions in the Memorandum of Agreement for the project. The design-build contractor will be responsible for the cost and repair of any damage to structures caused by the construction work. They shall repair any damaged historic structure in accordance with the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent on property owners allowing pre and post construction surveys of their buildings.</p>
<p>Local Boundaries of Historic Districts We also support the comment by Indiana Landmarks that the local historic district boundaries should be included where they are more expansive than the National Register boundaries. After all, Section 4(f) of the Department of Transportation Act explicitly protects “historic site[s] of national, State, or <i>local significance as so determined by such officials.</i>” 23 U.S.C. § 138(a) (emphasis added). In the event of a significant difference between the local and National Register boundaries, perhaps an updated review of the National Register boundaries might be warranted.</p>	<p>INDOT and FHWA recognize that Section 4(f) and Section 106 require them to take into consideration local significance when determining which properties merit historic status, but neither the U.S.C. or CFR say that local commissions should set NRHP boundaries. For purposes of Section 106, historic properties are defined as those which are listed in or eligible for the National Register of Historic Places. In some situations, a resource may also be locally designated by the Indianapolis Historic Preservation Commission. However, local designation does not qualify a property for Section 106 review. In addition, the boundaries of locally designated historic districts are often drawn using different criteria than those which are used for the boundaries of National Register of Historic Places districts.</p> <p>Properties listed in or eligible for the National Register of Historic Places within the North Split Area of Potential Effects were documented in a Historic Property Report submitted for consulting party review on January 8, 2018. An Addendum to the Historic Property Report based on possible temporary heavy truck traffic during construction was sent for consulting party review on September 28, 2018. No comments on historic properties or boundaries were received.</p>
<p>Public Comment – Roberta Avidor – September 5, 2019</p>	
<p>My name is Roberta Avidor. My husband Ken and I live in the Chatham Arch neighborhood. I attended a neighborhood meeting which resulted in the most recent letter to you from the Rethink 65/70 Coalition, dated September 5, along with the letter from our CANA president Shawn Miller.</p> <p>These are very succinct and thoughtful letters. We residents have to live with the consequences of having those interstates divide and negatively affect our neighborhoods. Some other cities have had the good sense to remove their downtown interstates all together. Our demands are very reasonable and I hope you will seriously regard them.</p>	<p>Thank you for your comment. INDOT is considering all possible mitigation ideas for the project.</p>
<p>I bike the underpasses nearly every day and some of them are downright disgusting and depressing. Dirty surroundings, insufficient and unattractive lighting, and a sense of danger makes me feel like a second class citizen,</p>	<p>Providing improved underpasses, particularly for use by pedestrians and bicycles, has been one of the primary interests expressed by the community in CSS workshops and other meetings held as part of the North Split project. As</p>

<p>as if being a cyclist or pedestrian was an afterthought on the highway engineers and designers’ part.</p> <p>Trees, lots of them, are absolutely necessary to make this project halfway tolerable. The terracing of the slopes leading up to the roadbed is a worthy idea and I hope you will implement that.</p>	<p>described in the CSS process, improving the user experience at underpasses will be an objective of the North Split project. See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41 for additional detail.</p> <p>It is anticipated vegetation will need to be removed as part of the project. However, as part of the CSS process, INDOT will investigate the possibility of avoiding impacts to the trees as well as replanting trees impacted by construction. Sideslope treatments will be developed as part of the Section 106 and CSS processes.</p>
<p>Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019</p>	
<p>Per your report, there are 51 National Register listed or eligible resources potentially affected by the North Split project. An Adverse Effect is defined as “when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association“.</p> <p>You have determined there are three “Adverse Effect Findings”:</p> <p>1 Old Northside Historic District 2 Morris Butler House 3 Chatham-Arch Historic District</p> <p>The report indicates that twenty-six resources have “No Adverse Effect Findings” and twenty-two resources have “No Effect Findings”.</p>	<p>After considering the information in the Assessment of Effects Report, Section 106 Update Memorandum #6, and Traffic Noise Barrier Addendum to the Assessment of Effects Report, there could be up to six recommendations of “Adverse Effects” depending upon the results of the noise barrier public involvement:</p> <p>Old Northside Historic District Morris Butler House Chatham-Arch Historic District Saint Joseph Neighborhood Historic District Massachusetts Avenue Commercial Historic District Lockerbie Square Historic District</p> <p>As a result of this change, there could be 22 No Effect recommendations, and 23 No Adverse Effect recommendations.</p>
<p>The interstates have had lasting impacts that the current planning and design has not addressed. Despite no additional lanes, the interstate facility has expanded, and its current transparency has been diminished further by greater bridge widths and reduced air gaps between bridge structures. Therefore, the Rethink 65/70 Coalition is concerned that not enough detail is provided to properly characterize the nature and intensity of the effects to the historic resources within the Area of Potential Effects (APE) of the North Split.</p>	<p>The Assessment of Effects Report provides an analysis of how the proposed plans for the North Split would affect the historic resources within the APE. The Assessment of Effects Report 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. The Des. No. for this project is 1592385.</p>
<p>1. Per the National Historic Preservation Act, an increased level of detail is required to “enable informed consideration of avoidance, minimization, or mitigation measures.”</p> <p>2. A delineation of how, exactly, the proposed plans for the North Split would alter or diminish the integrity of the character-defining features of the impacted historic resources is needed.</p>	<p>The Assessment of Effects Report provides an analysis of how the proposed plans for the North Split would affect the historic resources within the Area of Potential Effects. The Assessment of Effects Report 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. The Des. No. for this project is 1592385.</p>

<p>3. We would like to see more detail on those historic resources that received a “No Adverse Effect Findings” to understand the logic applied to that determination, for example to St. Joseph, Windsor Park and Cottage Home Historic Districts.</p> <p>4. In spite your report that a traffic simulation model concluded traffic changes would not result in adverse effects in historic districts surrounding the North Split, how do the ramp changes affect traffic patterns? The magnitude of those traffic shifts has not been reported so the residents can better understand how their historic resources would be impacted both during and after construction and the likely bottlenecks that will be shifted to other locations. Please provide the data from which the conclusions were derived. There may be improvements to the local street grid that can help mitigate these impacts.</p> <p>5. A visual analysis for each historic resource in proximity to the North Split should be provided so residents can accurately determine the visual impact of the interstate embankments and interstate infrastructure on them. This should be conveyed by technical drawings rather than illustrative renderings with distorted perspective.</p>	<p>Additional information is included the Assessment of Effects Report and Section 106 Update Memorandum #6 in IN SCOPE; see above for information on how to access the detailed reports. The Saint Joseph Neighborhood Historic District is discussed on pages 50-56 of the Effects Report; Windsor Park is discussed on pages 179-181, and Cottage Home is discussed on pages 78-80. As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. As documented in Section 106 Update Memorandum #6, a qualified professional historian reexamined the effects of the proposed project on the Saint Joseph Neighborhood Historic District. After considering the consulting party comments and information above, because the proposed edge of pavement will be 20 feet closer to the historic district boundary at its northeastern end, INDOT believes this visual intrusion will be substantially greater than the existing intrusion of the roadway. Therefore, INDOT believes the project will alter, directly or indirectly, characteristics of the Saint Joseph Neighborhood Historic District that qualify it for inclusion in the NRHP in a manner that would diminish the integrity of the historic property. INDOT is now recommending a finding of Adverse Effect for this historic district.</p> <p>The original No Adverse Effect findings for the Windsor Park and Cottage Home Historic Districts were made because the proposed conditions were not substantially different from the existing intrusion of the interstate. Based on this information, INDOT does not believe the project will alter, directly or indirectly, any of the characteristics of these two historic districts that qualify them for inclusion in the NRHP in a manner that would diminish the integrity of the historic district. INDOT continues to recommend a finding of No Adverse Effect for the Windsor Park and Cottage Home Historic Districts.</p> <p>The Traffic Analysis documentation, including a table of traffic data for each historic property, is included in Appendix A of the Assessment of Effects Report.</p> <p>Visual impacts are discussed for each property in the Assessment of Effects Report. Under Section 106, the proposed condition is compared to the existing condition. When assessing effects to historic properties, historians took into consideration how much different the proposed changes were to the existing interstate. If the intrusion appeared substantially different, an Adverse Effect finding was recommended.</p>
<p>The Rethink 65/70 Coalition has recommended CSS features such as new pedestrian and bicycle connectivity, new street connections, improved underpass designs that fosters neighborhood connectivity, side slope treatments</p>	<p>1. Local Street and Pedestrian Grid: As noted in the comment, INDOT has adjusted its plans for the Vermont Street underpass to accommodate vehicles as well as bikes and pedestrians. INDOT plans will maintain or enhance</p>

that include measures to restore and improve existing vegetative buffering, and improvements to noise reduction and air quality. **These CSS proposals need to be included in all Section 106 mitigation measures.**

1. Improve the local street and pedestrian grid so local traffic can reach local destinations without getting on the interstate:

- Connect 11th Street to Davidson Street as a local cross-town street connector.
- Connect the N/S Streets under I-70 between 16th and Roosevelt Ave.
- Connect 12th Street to 15th Street as a local cross-town connector
- Mill, repave, and restore pavement markings to all streets within the historic districts after construction.
- Repair and/or provide new sidewalk connections to create a connected pedestrian network between the historic districts and through the interstate.
- We support the recently reported decision of maintaining Vermont Street as a vehicular way in addition to improving the underpass for safe, well-lit bicycle/pedestrian facilities.

2. Integrate the Greenway System within current dead zones along the interstate:

- Develop a greenway link along 11 Street to the Davidson Street connector.
- Develop a crosstown greenway link between Martindale Brightwood and the Old Northside, utilizing the interstate bridge crossing College to incorporate an elevated pedestrian connector for the greenway link.
- Ensure the 10th Street Payne Connection between the Indianapolis Cultural Trail and the Monon Trail is equal to or better than existing conditions.

3. All underpasses should be designed to:

- Incorporate wide sidewalks with separation buffer from traffic
- Be easy to maintain free of graffiti and constructed of durable, long-lasting materials.
- Have lighting levels that are uniform and consistent with day or night lighting conditions outside the underpass, not introduce veiling glare or hot spots, and ideally be reflective rather than direct. Underpass lighting should be variable at approaches and exits to compensate for abrupt change of light levels [exceeding 3:1] at those locations. Daylighting light wells [gaps in overpass structures as currently exist at the three 10th Street overpass bridges] should be incorporated for long underpasses. We do not want the poor light conditions such as that under the Virginia Street parking garage or at the Heliport

bicycle and pedestrian facilities at all underpasses between the historic areas through the interstate corridor. Current plans for other items mentioned are either not included in project planning or are not currently defined.

The project team has been coordinating with the City of Indianapolis to potentially reestablish Lewis Street under I-70 as a local connection between 10th Street and 16th Street, with an intersection at 13th Street to connect with Roosevelt Avenue. INDOT is not planning an additional connection under I-70 between Roosevelt Avenue and 16th Street at Columbia Avenue. This connection is not recognized as a planning objective by the City of Indianapolis and it would be only 0.15 mile from the proposed Lewis Street connection.

The other two “local cross-town connectors” are also not a part of current planning. The 11th Street to Davidson (actually Bellefontaine) Street connector to provide a vehicle path around the existing IPL substation would have limited utility and would require realignment of Bellefontaine onto private property to provide a safe intersection. Instead, a temporary greenway link is being considered on this alignment. The 12th Street to 15th Street connection would also have limited utility. Neither of these roadway links have been identified as a planning objective of the City of Indianapolis.

2. Greenway System: The proposed greenway links were either presented as CSS options or were suggested by participants in the second round of CSS public workshops. These proposals are currently under review.

3. Underpass Design: Details are still to be determined, but it is anticipated that most proposals will be incorporated in project design, including wide sidewalks, controlled drainage, elimination of “nooks and crannies,” and graffiti resistant materials. The lighting suggestions, as presented, will be specifically considered during design. Right-of-way fencing will be minimized to the extent feasible by including pedestrian scaled retaining walls where appropriate.

It has not been determined whether the Payne Connection Plaza, murals, and custom light fixtures will be restored as they are now, but the proposal will be considered.

<p>underpass.</p> <ul style="list-style-type: none"> • Have no nooks or crannies where people can sleep or hide. • Have no drainage systems emptying into the pedestrian space. • Integrate walls into the urban fabric and make them pedestrian scaled (no higher than 8-feet) to minimize or eliminate right-of-way fencing. • Restore the Payne Connection Plaza, murals and custom light fixtures between Bellefontaine and 10th Street. <p>4. Within the historic districts, the design and configuration of side slopes, embankments, and retaining walls should optimize the planting of dense vegetation on wide terraces. Vegetative buffering needs to be equal or better in density and size to existing conditions and should include a variety of mature evergreen and deciduous shade trees to ensure screening on a year-round basis.</p> <p>5. The pending results of the Section 106 Noise Addendum are also of great interest and concern and we look forward to further engagement and discussions to reduce noise generation through design, materials, vehicular controls, including:</p> <ul style="list-style-type: none"> • Minimizing steep grades on main lines and ramps. • Delineation of where the “Next Generation” pavement grooving will be applied. • Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems. • Soundproofing windows in structures within one block of the interstate. <p>6. Design road edges for noise containment/deflection</p> <ul style="list-style-type: none"> • Specify higher median/edge crash barriers. • Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible. • Install dense vegetation along roadway edges and between structures. <p>7. Repair and reinforce existing historic structures to withstand vibrations during construction activities.</p>	<p>4. Vegetation Buffering and Terraces: Vegetation plans have not yet been determined, but the suggestions regarding size and density, and use of a variety of evergreens and deciduous shade trees will be considerations in developing the plan. The concern for adequate screening of adjacent neighborhoods with tree planting will be a major consideration for the project.</p> <p>5. Noise Studies: Section 106 Update Memorandum #6 documents the results of the noise analysis for historic properties and the Traffic Noise Barrier Addendum to the Assessment of Effects Report documents the effects to historic properties from possible reasonable and feasible locations of noise barriers. Input from benefitted noise receivers will be gathered before a decision on the construction of a noise barrier is made. Noise abatement will be done in accordance with the INDOT Traffic Noise Analysis Procedure (2017).</p> <p>Next generation pavement grooving will be used on the interstates throughout the project area. Steep grades are minimized in the project area in accordance with FHWA guidelines for urban interstate highways. Vehicle noise regulations are outside the scope of the project.</p> <p>6. Design Features for Noise Containment/Deflection: Consideration is being given to raising the height of planned barrier walls. Tall double median barriers with plant infill between opposing lanes is not being considered since it would compromise the objective of minimizing the width of the planned roadbed, which has been a primary public request during project development. The installation of dense vegetation along the outside of roadways is being considered as part of the overall planting program. However, it generally takes about 90 feet of dense vegetation to reduce noise by 5 dB. As it pertains to noise, trees and other vegetation can be planted for psychological and/or aesthetic benefit, but not to physically lessen noise levels.</p> <p>7. Vibration Impacts: As described in the Assessment of</p>
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	<p>Effects Report, dated August 9, 2019, each historic district adjacent to the project has been reviewed for potential vibration effects. As described in the report, where vibration effects are possible based on the proximity of the historic district to construction activities, "...the contractor will be required to prepare a construction Vibration Monitoring and Control Plan. This plan includes preconstruction surveys of historic buildings, monitoring vibration during construction, postconstruction surveys, and keeping the public informed of construction activities known to be a source of vibration. The contractor will also be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties. These maximum damage risk thresholds are identified in the Federal Transit Administration [2018] <i>Transit Noise and Vibration Impact Assessment Manual</i> and are based on past technical research and published studies completed to assess effects of construction vibration on buildings." In addition, the design-build contractor will be responsible for the cost and repair of any damage to structures caused by the construction work. They shall repair any damaged historic structure in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p>
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Public Comment – Nancy Schaefer – September 9, 2019

<p>I have just returned from a Chatham Arch Neighborhood meeting. We are very disappointed to learn the adverse effect the 65/70 Split Project will have on our neighborhood. It is unfortunate we did not have notice of this sooner than just on one side of holiday when so many neighbors were away. We are very concerned about the height of project near the College and 11 th street area of Chatham Arch. The height and noise and visibility into the homes in that area is going to cause irreparable damage to the area. Property values will be greatly diminished.</p> <p>We have lived in the area for 6 years now and grown to love the vibrancy and sense of community this historic neighborhood has. It is sad that INDOT and HNTB did not have more concern for the historic nature of the area and for the many years it has taken to build this neighborhood up to be such a vibrant, active and valuable part of Indianapolis. Once a rundown area of derelict homes, abandoned buildings with all sorts of unsavory activities, it is now a bustling community where neighbors share their porches with each other and contribute to the city in various roles.</p>	<p>The information presented at the Section 106 Consulting Parties meeting on August 29, 2019, is taken from the Section 106 Assessment of Effects Report. A copy of the report was provided to all consulting parties, including neighborhood association representatives, on August 9, 2019, with a request for comments to be submitted within 30 days (on or before September 11, 2019).</p> <p>INDOT's objective in the North Split process has been to evaluate this project carefully to find the best balance of meeting the region's mobility needs and minimizing impacts to the community. The result is a layout that provides most of the movements that currently exist, with greatly improved safety and a smaller footprint for the interchange.</p> <p>Multi-level interchanges such as the North Split invariably introduce changes in elevation as roadways cross. The CSS process currently underway has focused on how best to integrate the project into the community. INDOT will continue to seek ways to minimize and mitigate impacts to adjacent neighborhoods and will provide mitigation for historic resources as part of the Section 106 consultation process.</p>
<p>We hope some reconsideration can be done to the height of this pass. And trees, preferably pine trees used to buffer sight and sound would be greatly appreciated. Perhaps as you take away some of our neighborhood you could give back to us by helping rebuild streets such as 10th and 11th.</p>	<p>Minimizing the height of the interchange, especially adjacent to neighborhoods, was a major objective in developing the new configuration for the North Split. Many options such as the one suggested for the Delaware Street ramp were considered before settling on the current proposal. The challenge was how to best balance all competing objectives</p>

	<p>while still meeting the needs the interchange must serve. The proposed alternative was the most effective to accomplish that.</p> <p>Opportunities to retain existing trees are being explored. Details related to project design and clear zones are being defined so that options can be better understood. The concern for adequate screening of adjacent neighborhoods with tree planting will be a major consideration for the project.</p> <p>Thank you for the mitigation ideas. INDOT is currently considering possible mitigation options for Adverse Effects to historic properties.</p>
<p>Public Comment – Strong Indy – Jordan Ryan – September 11, 2019</p>	
<p>The City of Indianapolis has long been subject to painful practices as it relates to housing and transportation over the decades. City residents of generations past carried the weight of having neighborhoods wiped out for highway megaprojects. While the demographics of some of Indianapolis’s core neighborhoods may have changed, the need to begin rethinking the process of how we design our highways and begin implementing restorative measures that can be expanded upon to less advantaged neighborhoods in the future has not waned.</p>	<p>INDOT’s objective in the North Split process has been to evaluate this project carefully to find the best balance of meeting the region’s mobility needs and minimizing impacts to the community. A review of potential downtown concepts is presented in the “System-Level Analysis of Downtown Interstates.” A review of alternative configurations is provided in the “Alternative Screening Report.” These reports are available on the project website. The result is a layout that provides most of the movements that currently exist, with greatly improved safety and a smaller footprint for the interchange.</p> <p>The CSS process currently underway has focused on connectivity and enhancements at a neighborhood level.</p>
<p>Strong Indy strongly supports the Rethink 65/70 Coalition in their mitigation requests, including the following:</p> <ul style="list-style-type: none"> - Reconnection of the street grid - Designing the system with the pedestrian and urban resident at the forefront - Integrating sustainable transportation modes at the ground level, particularly walking and bicycling - Integrating lighting and drainage systems that no longer dump mud and trash onto the sidewalks - Maintenance and cleaning of INDOT right-of-way by INDOT crews and not burdening the City or the neighborhoods to fund this task – as many neighborhoods cannot afford to do so and the City’s budget is already strained. 	<p>Most of the points noted are being actively considered or pursued as part of the CSS process currently underway. See response to “Public Comment – Rethink Coalition – Kevin Osburn – September 9, 2019” on page 41.</p> <p>Federal funding for interstate highway projects can be used for design-related mitigation, but there is no provision to “bank” this money for ongoing maintenance. INDOT shares the concern for long-term maintenance of CSS components and is exploring options to minimize maintenance needs and/or to engage partners to support a higher than ordinary degree of maintenance if required. These issues are still being explored.</p>