



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness, Commissioner**

December 19, 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 #8, Effect Finding, and 800.11(e) Documentation

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 Alabama Street (to Illinois Street along 11<sup>th</sup> and 12<sup>th</sup> Streets); 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.

## **Section 106 800.11(e) Documentation**

The Section 106 800.11(e) Documentation has been prepared for the project. The documentation includes the official Section 106 effect finding for the project as well as a summary of the Section 106 consultation history. The Section 106 800.11(e) Documentation 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 (7) days.

## **Section 106 Mitigation Ideas**

Based on feedback from consulting parties, INDOT offers the following mitigation ideas for adverse effects to historic properties resulting from the North Split Project:

- A. Tree Preservation and Plantings
  - a. Adjacent to the Old Northside Historic District and Morris Butler House, a Do Not Disturb Area will be identified along the north side of I-65 from College Avenue to Alabama Street in order to

preserve some existing trees. The design-build contractor will only be allowed to install new drainage connections (to existing pipes) in this area. No clearing of trees 2-inch diameter at breast height (DBH) or greater is allowed in the Do Not Disturb Area. The design-build contractor will have 15 feet north of the retaining wall to work; everything north of that will be a Do Not Disturb Area. Trees shall be preserved in this Do Not Disturb Area. This will result in a slightly taller retaining wall in order to tie back down to the existing slope, but greater shielding will be provided with existing vegetation.

- b. Shrubs will be planted in the 15-foot disturbed area along the north side of I-65 from College Avenue to Alabama Street between the retaining wall and Do Not Disturb Area.
- c. Adjacent to the Saint Joseph Neighborhood Historic District, a Do Not Disturb Area will be identified along the south side of the Delaware entrance ramp between Delaware Street and Alabama Street in order to preserve some existing trees. The design-build contractor will only be allowed to install new drainage connections (to existing pipes) in this area. No clearing of trees 2-inch dbh or greater is allowed in the Do Not Disturb Area. This will result in a short retaining wall in this area in order to tie back down to the existing slope, but greater shielding will be provided with existing vegetation.
- d. Adjacent to the Saint Joseph Neighborhood Historic District and Chatham-Arch Historic District, shrubs will be planted on the side slope south of I-65 between Alabama Street and College Avenue. Trees will be planted along the toe of slope if space allows.
- e. The northern earthen berm in the interchange, where pavement will be removed, will be maintained and trees planted on it as visual shielding for the Old Northside Historic District from the interchange.
- f. The southwestern earthen berm in the interchange, where pavement will be removed, will be maintained and trees planted on it as visual shielding for the Chatham-Arch Historic District from the interchange.
- g. If existing vegetation is removed during construction, new trees will be planted along the western side slope of I-65/I-70 south of the interchange from 10<sup>th</sup> Street south to St. Clair Street. Planted trees will be 2-inch dbh in size or greater.
- h. Adjacent to the Lockerbie Square Historic District, a Do Not Disturb Area will be identified along the west side of I-65/I-70 from Michigan Street to New York Street along the toe of slope in order to preserve the existing trees. The design-build contractor will only be allowed to install new drainage connections (to existing pipes) in this area. No clearing of trees 2-inch dbh or greater is allowed in the Do Not Disturb Area. This will result in a short retaining wall in order to tie back down to the existing slope, but greater shielding will be provided with existing vegetation.
- i. Planted trees will be 2-inch dbh in size or greater.

## B. Connectivity Improvements

- a. To improve connectivity between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements will be made to the Alabama Street underpass. Improvements include new lighting on the bridge and signage along Alabama Street identifying each neighborhood.
- b. To improve connectivity between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements will be made to the Central Avenue underpass. Improvements include a wider bridge opening (65 feet to at least 76 feet), wider sidewalks, new lighting on the bridge,

vertical bridge walls, elimination of drainage from the bridge above on to the street and sidewalks, and space for murals.

- c. To improve connectivity between the Old Northside and Chatham-Arch Historic Districts, improvements will be made to the College Avenue underpass. Improvements include wider bridge openings (79 feet to at least 87 feet), wider sidewalks, new lighting on the bridge, vertical bridge walls, elimination of drainage on to the street and sidewalks, and space for murals.
- d. Funding for a portion of and possible right-of-way use for the Old Northside Connector, a pedestrian and bicycle path to connect the alley south of the Benjamin Harrison Presidential Site to Pennsylvania Street. This item is contingent upon a maintenance agreement with the Benjamin Harrison Presidential Site to maintain the Connector. The Old Northside Connector would not be open to vehicular traffic.
- e. A temporary detour will be required for the Monon Trail during construction. The detour will be 10-foot wide and compliant with the Americans with Disabilities Act (ADA). The detour will reconstruct a portion of the Old Northside Trail in the O'Bannon Soccer Park and divert onto INDOT property before connecting to College Avenue. The trail will pass under College Avenue and divert to the southeast on INDOT property to connect to existing sidewalk across 10<sup>th</sup> Street from the Cultural Trail. The portion of the detour within the O'Bannon Soccer Park, within INDOT right-of-way west to College and under the College Avenue bridges will remain as a permanent feature to improve connectivity between the Old Northside and Chatham-Arch Historic Districts.
- f. To protect the brick portion of 10<sup>th</sup> Street, "No Construction Traffic" and "Local Traffic Only" signs will be installed at the entrance to the brick portion of 10<sup>th</sup> Street from Delaware Street to Central Avenue.

#### C. Education/Interpretation/Community Outreach

- a. INDOT will complete an oral history initiative, which will focus on:
  - 1. The history of the historic neighborhoods in the area surrounding the North Split
  - 2. Planning and construction of the interstate
  - 3. Impacts resulting from the construction of the interstate
  - 4. Revitalization efforts
- b. The collected oral histories may be used to develop a documentary film, podcast, website, or other publicly accessible format.
- c. Development of a traveling exhibit that will be available for use by local schools, libraries, non-profit organizations, and other public venues to highlight the history of the neighborhoods before and after the construction of the interstate. The exhibit will include mapping and photographs and will explore the social, cultural, and architectural history of the area. The exhibit could also include a history of transportation in the area and how the neighborhoods have evolved following construction of the interstate.

#### D. Vibration

- a. The design-build contractor shall develop a Vibration Monitoring and Control Plan. The plan should at least include all buildings within historic properties or districts within 140 feet of project construction activities. The Plan will include the following key elements:
  - i. Identifying buildings that are sensitive to vibration;

- ii. Conducting pre-construction surveys of residences, historic buildings, and other vibration-sensitive structures in the project corridor to determine the appropriate vibration limits for the type of structure and conditions of the structure;
  - iii. Developing and implementing a vibration monitoring program for construction activities;
  - iv. Conducting post-construction surveys;
  - v. Phasing construction activities that create vibration so that multiple sources of vibration do not occur at the same time;
  - vi. Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours;
  - vii. Developing a method for responding to community complaints; and,
  - viii. Keeping the public informed of proposed construction schedules, and identifying activities known to be a source of vibration.
- b. Maximum thresholds for historic properties that the plan must meet are shown in Table 1 below. The values are presented in terms of peak particle velocity (PPV), the accepted method for evaluating the potential for damage.

Table 1. Construction Vibration Thresholds (PPV)

Type of Structure	Ground-borne Vibration Impact Level (PPV)
Fragile (non-engineered timber and masonry buildings)	0.20 in/sec
Extremely Fragile (buildings, ruins, ancient monuments)	0.12 in/sec

- c. 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.
- d. In the event vibration damage does occur, the design-build contractor will be responsible for the cost and repair of any vibration damage to historic properties. Any repairs shall be coordinated with the SHPO to ensure they are carried out in accordance with the Secretary of 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.
- e. Where access to privately owned property is necessary for monitoring or damage repair, consent shall be obtained prior to entry.

E. Noise Barriers 4, 5, and 7 (only if the barrier is constructed)

- a. Noise Barrier Aesthetics Advisory Team – This team will be comprised of representatives of FHWA, INDOT, SHPO, and interested consulting parties. This team will provide input during the design phase regarding the aesthetics of the noise barriers. Input from the Noise Barrier Aesthetic Advisory Team will be considered along with input from the adjacent neighborhood(s) to determine the aesthetics of the noise barrier.

After comments have been received on draft mitigation proposals, a draft Memorandum of Agreement (MOA) will be prepared and circulated for consulting party review.

**Consulting Parties Meeting/WebEx**

We would like to invite you to participate in a Consulting Parties Meeting on January 16, 2020 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 possible mitigation ideas and next steps in the Section 106 consultation process.

**When it's time, join your Webex meeting here.**

Meeting number (access code): 746 594 588

**Join meeting**

**Join by phone**

Tap to call in from a mobile device (attendees only)

[+1-415-655-0002](tel:+14156550002) US Toll

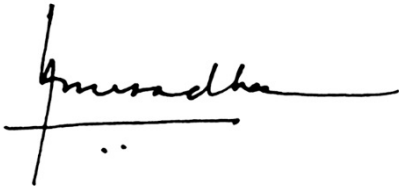
[+1-855-797-9485](tel:+18557979485) US Toll free

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](mailto: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](mailto:kgillette@hntb.com)

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

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

Enclosures:

Attachment A - Consulting Party Comments & Responses  
Section 106 800.11(e) Documentation

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  
Alesha Cerny, 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  
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  
Amina Pierson, Martindale Brightwood Community Development Corporation  
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 #8**

# **Attachment A**

**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 October 2, 2019 to December 9, 2019 to Section 106 Update Memo #6, Traffic Noise Barrier Addendum, and Section 106 Update Memo #7**

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

Comment	Response
<b>Windsor Park Neighborhood Association – Jen Eamon – October 14, 2019</b>	
<p><i>I understand that the dates for the Traffic Noise Analysis public meetings were set a few weeks ago for:</i></p> <p><i>Oct 17 –Athenaeum</i> <i>Oct 22 –Firefighters Union</i> <i>Oct 23 – McGowan Hall</i> <i>Nov 12 – Martindale/Brightwood</i></p> <p><i>Could you please confirm the public meeting information and meeting details (times)?</i></p> <p><i>Based on the report, our neighborhood will have a one decibel increase in highway noise level. I am assuming that some of this is related to the increase in height for the bridges and the plan to install sound walls on the west and north sides of the interstate, where it wraps around our neighborhood. The public meetings should involve neighborhoods on both sides of the interstate.</i></p> <p><i>Just like the prior CCS meetings, our neighbors should have an opportunity to understand what INDOT is proposing in order to comment.</i></p>	<p><i>Everyone is welcome at the meetings to learn more about INDOT’s noise policy. However, these meetings are not intended to be CSS workshops, but rather are information sessions about the noise policy and abatement concepts for North Split.</i></p> <p><i>A one decibel increase would not be perceptible. Essentially, the noise in that area would be similar to existing conditions. The model results in the Table 1 “Representative Change” column of the Section 106 Update Memo #6 do not include the noise barriers.</i></p> <p><i>The meeting information is included below and is also available on the project website:</i> <a href="https://northsplit.com/noise/noise-abatement-open-houses/">https://northsplit.com/noise/noise-abatement-open-houses/</a></p> <ul style="list-style-type: none"> <li>• <i>Thursday, Oct. 17, 6-8 p.m. – Noise Barrier 7 – Athenaeum Auditorium, 401 E. Michigan St., Indianapolis</i></li> <li>• <i>Tuesday, Oct. 22, 7-9 p.m. – Noise Barrier 5 – Firefighters Museum, 748 Massachusetts Ave., Indianapolis</i></li> <li>• <i>Wednesday, Oct. 23, 6-8 p.m. – Noise Barrier 4 – Knights of Columbus McGowan Hall, 1305 N. Delaware St., Indianapolis</i></li> <li>• <i>Tuesday, Nov. 12, 7-8:30 p.m. – Noise Barrier 3E – 37 Place Community Center (Gymnasium), 2605 E 25th St., Indianapolis</i></li> </ul>
<b>Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019</b>	
<p>KIB has not discussed this as a team yet, however, we did submit initial comments from the findings of no adverse effect a few weeks ago, and wanted to be sure to share some feedback on this memo.</p> <p>Regarding the noise factor, I would like to add that KIB is concerned about the addition of two story walls based on feedback we have heard from neighbors who would be impacted by this addition. Aesthetically these walls would</p>	<p>Members of the project team met with Keep Indianapolis Beautiful (KIB) on October 28, 2019 to discuss their experiences with tree planting projects in Indianapolis. KIB staff provided species lists of plants shown to be most successful based on their local experience. KIB gave members of the project team a driving tour of several of their tree planting projects within the city on November 11, 2019.</p> <p>The Federal Highway Administration (FHWA) has developed</p>

<p>have a significant impact upon the urban experience and relationship with the neighborhoods, but environmentally and based on national research, we believe the use of trees could help with the mitigation of the noise pollution caused by the highway.</p> <p>Recently, our team reviewed some resources that discuss how trees have a significant impact on reducing noise, and it would be good to discuss these findings at some point. Perhaps during our next Context Sensitive Solutions meeting we can discuss this. I know feedback from that process has been heavy on native plantings and trees, so this would support the CSS efforts.</p> <p>Further, KIB maintains the importance of ensuring the North Split project not only replaces but adds to the net green infrastructure that exists. Considering trees as an alternative to walls would also further this effort with a creative solution to noise barriers. Please let me know how I can assist further.</p>	<p>regulations regarding noise analysis on federally funded highway projects, and the Indiana Department of Transportation (INDOT) has outlined its implementation guidance in its Traffic Noise Analysis Procedure (2017).</p> <p>INDOT recognizes the trade-off between the sound reduction benefits of noise barriers and their visual impacts. In accordance with INDOT’s Traffic Noise Analysis Procedure, noise impact levels and locations where noise barriers may be feasible and reasonable have been presented to the public, and benefitted receivers have the opportunity to express their opinion regarding the trade-off of noise abatement versus visual impacts.</p> <p>There is insufficient space in INDOT right-of-way to plant trees at a depth and density to provide noise abatement benefits at a level similar to noise barriers. This does not diminish the consideration of trees for aesthetic, air quality, and other benefits. INDOT is offering tree plantings as mitigation for adverse effects to historic properties as identified in the Section 106 800.11 documentation.</p>
<p><b>Interstate Business Group – Paul Knapp – October 18, 2019</b></p>	
<p>As the public meetings on the noise report have begun and the survey seeking input from affected property owners and tenants are out, I would like to provide you and INDOT with the Rethink 65/70 Coalition’s formal position regarding the noise barriers for the North Split reconstruction. The Coalition leadership team has consulted with its constituencies and then met to discuss this issue and reached a unanimous position.</p> <p>The Rethink Coalition opposes the erection of all noise barriers along the I-65 and I-65/I-70 stretches of the North Split project identified in the report as 4, 5, 7A, and 7B. The Coalition understands that the Martindale-Brightwood neighborhood is in favor of noise barriers along the north side of I-70, identified in the report as 3E, and, therefore, the Coalition supports noise barriers in that area.</p> <p>Further, the Rethink Coalition leadership team is actively on the ground working to educate the property owners and tenants identified as receiving surveys along I-65 and I-65/I-70 about the issues involved in the noise report and strongly encouraging them to return their surveys expressing that they are not in favor of noise barriers in their areas.</p>	<p>FHWA has developed regulations regarding noise analysis on federally funded highway projects, and the INDOT has outlined its implementation guidance in its Traffic Noise Analysis Procedure (2017).</p> <p>INDOT recognizes the trade-off between the sound reduction benefits of noise barriers and their visual impacts. In accordance with INDOT’s Traffic Noise Analysis Procedure, noise impact levels and locations where noise barriers may be feasible and reasonable have been presented to the public, and benefitted receivers have the opportunity to express their opinion regarding the trade-off of noise abatement versus visual impacts.</p> <p>INDOT’s Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the Rethink 65/70 Coalition is still important as general project input, which is always welcomed by INDOT.</p>
<p><b>Interstate Business Group – Paul Knapp – October 23, 2019</b></p>	
<p>As you know, the Rethink 65/70 Coalition has submitted two detailed sets of recommendations in the CSS process, one in May and a second in August of this year. Although a lot of the focus of those submissions was on the actual interchange of the North Split project, for example, a heavy emphasis on planting an urban forest in the</p>	<p>The clarification that the Rethink 65/70 input regarding extensive tree planting areas applies to the legs of the North Split interchange as well as the interchange area itself is understood and recognized.</p> <p>This comment is acknowledged as a supplement to the</p>

<p>interstitial spaces between the bridges and ramps, the Coalition did make specific recommendations for additional tree plantings along the three “legs” of the North Split coming out the interchange. (See first submission Item 5 and second submission Comments to Pages 23 and 24.)</p> <p>While the Coalition leadership team has been recently working on the noise barrier issues and meeting with our constituencies (neighborhood leaders, business owners, and individual residents) we have been hearing over and over people’s support for tree plantings along the “legs” of the finished North Split in addition to the urban forest in the interchange itself. It has come up in nearly every conversation with property owners on both sides of each stretch of the interstates. As I look back on the Coalition’s two CSS submissions, I’m not sure we emphasized the degree of support for tree plantings along the “legs” of the North Split as much as we should have, given the enormous pressure we are feeling on this issue today.</p> <p>So, I would like to use this email to supplement our earlier submissions and express the Coalition’s strong recommendation and support for tree plantings along all stretches or “legs” of I-65, I-70, and I-65/I-70 coming out of the new interchange. I have attached a new illustration depicting the urban forest we recommend and envision for the completed North Split reconstruction.</p>	<p>previous input to the CSS process by the Rethink 65/70 Coalition.</p>
<p><b>Martindale Brightwood Community Development Corporation – Amina Pierson – October 21, 2019</b></p>	
<p><i>Yes, I am interested in being a Consulting Party for Section 106.</i></p>	<p><i>[The former Martindale Brightwood Community Development Corporation representative email address bounced back and Ms. Pierson responded to an inquiry about a new consulting party representative from the organization.]</i></p> <p><i>Thank you for responding. I will add you to the North Split Consulting Parties list. I will also forward some recent correspondence and a meeting request for a Consulting Parties meeting on 10/29.</i></p>
<p><b>Chatham Arch Neighborhood Association – Shawn Miller – October 2, 2019</b></p>	
<p>Just a request that it would be really helpful if INDOT could bring along some actual elevations drawn to scale-of what this is going to look like with these proposed barriers and without them. We are used to getting elevations when we review proposed projects in our area, so know how to read them, and sort of expect this.</p> <p>This thing is getting really tall and I don’t think the kind of renderings we were given in earlier presentations really indicate what you are proposing here. Many people in CA felt the rendering shown in the previous report was not helpful.</p> <p>It might also help to have a cross section elevation with</p>	<p>Thank you for the suggestion. Boards with profiles and cross sections at points within the historic districts were provided at the noise neighborhood meetings and in the presentation for Consulting Parties Meeting #6. In addition to existing ground elevations, the cross sections include the first adjacent building to provide a sense of scale for the height of the noise barriers. Display boards from the noise meetings are posted on the project website:  <a href="https://northsplit.com/wp-content/uploads/2019/11/Noise-Barrier-Public-Meeting-Boards_FINAL_10-11-19.pdf">https://northsplit.com/wp-content/uploads/2019/11/Noise-Barrier-Public-Meeting-Boards_FINAL_10-11-19.pdf</a></p>

<p>adjacent buildings so that we can see how this relates height wise to its surrounding structures, and maybe even a before (existing highway) and after kind of thing.</p>	
<p><b>Chatham Arch Neighborhood Association – Shawn Miller – October 24, 2019</b></p>	
<p>Thanks so much for your presentation on Tuesday to the Neighborhoods affected by Sound from the New North Split. I am sure you came away with the feeling that people are very passionate about the issue of these sound barriers on both sides.</p> <p>After the Presentation the Chatham Arch Neighborhood Association voted nearly unanimously to oppose the installation of the Barriers. The general feeling was that the new pavement technologies being employed, as well as the superior bridge construction, should reduce the sound from its current level; and that the minimal sound reduction garnered from the barriers was outweighed by the height that they will add to the interstate itself. Many people view the interstate as a barrier between the neighborhoods and perceive that this increased height further adds to that barrier.</p> <p>Additionally I think everyone is on board with planting as many trees as possible in the Interstate right of way, which will not only reduce sound, but hide the interstate and its traffic visually once they mature.</p> <p>As a personal aside I know it's not INDOTS mission to plant trees, however, I think there is a growing awareness that the neighborhoods surrounding the interstate need to take a more proactive role in doing what we can to get that accomplished and assisting in maintaining them once they are planted.</p>	<p>INDOT's Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the Chatham Arch Neighborhood Association is still important as general project input, which is always welcomed by INDOT.</p> <p>See the response to "Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019" and "Interstate Business Group – Paul Knapp – October 18, 2019" for additional information about INDOT's Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project for noise reduction.</p> <p>INDOT is offering tree plantings as mitigation for adverse effects to historic properties including the Chatham-Arch Historic District. Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation.</p>
<p><b>Saint Joseph Neighborhood Association – Mark Godley – October 29, 2019</b></p>	
<p>The St. Joseph Historic Neighborhood Association appreciates the opportunity to respond to the to the presentation on October 23, 2019 at MacGowan Hall on possible sound barrier remedies related to the North Split proposed construction project.</p> <p>Our board of directors supports the sections of the noise reduction presentation devoted to next generation sound dampening in the construction of new interstate pavement and other similar unobtrusive measures. However, we oppose constructing tall barrier walls as the reduction in decibel level is small when compared to the unnatural visual assault of tall concrete walls and the permanent invitation to tagging by gangs and others. Instead we support proposals that provide as much urban forestation as possible to achieve more visually appealing sight and sound reduction.</p> <p>We continue to support noise mitigation recommendations</p>	<p>INDOT's Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the St. Joseph Historic Neighborhood Association is still important as general project input, which is always welcomed by INDOT.</p> <p>See the response to "Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019" and "Interstate Business Group – Paul Knapp – October 18, 2019" for additional information about INDOT's Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.</p> <p>The noise mitigation recommendations from the Rethink 65/70 Coalition were received as part of the CSS process and are currently being considered.</p> <p>The planned location of the Delaware Street ramp near the St</p>

<p>from the Rethink Coalition calling for:</p> <ul style="list-style-type: none"> <li>- Soundproofing windows in structures within one block of the interstate.</li> <li>- Minimizing steep grades on main lines and ramps in order to maximize planting of dense vegetation on wide terraces.</li> <li>- 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</li> <li>- Enacting/enforcing vehicle noise regulations such as truck engine-braking and deficient exhaust systems.</li> <li>- Design road edges for noise containment/deflection</li> <li>- Specify higher median/edge crash barriers.</li> <li>- Consider tall double median barriers with dense plant material infill between the opposing travel lanes where possible.</li> <li>- Install dense vegetation along roadway edges and between structures.</li> </ul> <p>Two final points of concern to the St. Joseph neighborhood: First, 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>Second, we also would like the existing Alabama Street underpass to encompass some improvements for noise reduction (e.g., correcting daylight gap in the overpass bridge), overall safety and cleanliness, adding to connectivity with better lighting and efforts to minimize noise, water runoff from the roadbed, and discouraging the homeless from camping out in the rafters.</p> <p>We look forward to further discussions on how this monumental project will affect downtown neighborhoods.</p>	<p>Joseph Historic District is shown on the map on Figure 5, Sheets 5-9 (pages 15-19) of the Assessment of Effects report and is further described on pages 6 and 7 of the Update Memo #6. Additional information was presented in noise barrier public meetings, including a display board showing an elevation and cross section view of the Delaware Street ramp just east of Alabama Street. Board 13 of 16 shows elevation of the proposed roadway as well as Noise Barrier 5. Display boards from the noise meetings are posted on the project website:  <a href="https://northsplit.com/wp-content/uploads/2019/11/Noise-Barrier-Public-Meeting-Boards_FINAL_10-11-19.pdf">https://northsplit.com/wp-content/uploads/2019/11/Noise-Barrier-Public-Meeting-Boards_FINAL_10-11-19.pdf</a></p> <p>In fact, Section 106 Update Memo #6 indicated that after considering consulting party feedback, the proximity of the new interstate construction, introduction of a retaining wall, and the residential nature of the district, the Section 106 effect finding was changed from “No Adverse Effect” to “Adverse Effect.”</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 interstate bridge over the Alabama Street underpass is not a part of the project. However, INDOT is recommending some improvements to the Alabama Street underpass to improve connectivity between the Old Northside and St. Joseph Neighborhood Historic Districts. Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation.</p>
<p><b>Holy Cross Neighborhood Association – Kelly Wensing – October 29, 2019</b></p>	
<p>The Holy Cross Neighborhood Association (HCNA) submits this correspondence in response to the Traffic Noise Technical Report that was completed for the I-65 / I-70 North Split project. We would like to specifically address the addition of sound barriers in an attempt to reduce noise that will be produced by traffic using the corridor.</p> <p>INDOT’s measurement of noise indicated a stretch of interstate that would be loud enough to be eligible for sound walls within our neighborhoods boundary. Properties within Holy Cross Neighborhood on the east</p>	<p>The Vermont Street overpass should have been shown with a red box like the Michigan, New York, Ohio, Market, and Washington overpasses. The decision to provide an overpass for vehicles at Vermont Street was announced by INDOT on September 5, 2019, and the Noise Report was published on September 24, 2019. This change to the base map was simply overlooked.</p> <p>Reflection of sound to the opposite side of a highway can occur with some types of noise barriers, but it is not an issue with the type of noise barriers used by INDOT. INDOT requires absorptive (rather than reflective) noise barriers per</p>

side are listed are “not impacted / not benefited” and there are some properties on our western boundary that are “impacted / benefited”. Can you please clarify the project images on pages seven and eight of Appendix A that **do not** show Vermont as a red outlined overpass. We would appreciate an explanation as to why Vermont doesn’t have the same treatment as Michigan, New York, Ohio, Market, and Washington overpasses all of which land within our neighborhood boundaries.

The report shows some stretches of sound walls would only be placed on one side of the interstate, which according to research can amplify the sounds thrown to the other side. There is also research that shows sounds going over walls can actually be amplified by the walls, which is something a field measurement device at ground level would not be picking up. This says nothing about the aesthetics of having a 19-foot wall on top of the 4-foot traditional barrier on sections of interstate which are not that wide - making this lopsided approach aesthetically displeasing. These walls do absolutely nothing to elevate the look of this scare running through our neighborhood. The minimal sound reduction provided by the sound walls is not worth the additional height to the interstate, which would add visual pollution to our city’s interstate corridor.

We believe that maintaining and building on the current urban forest will create a visually more attractive sound barrier, reduce carbon, and help with run off. When the 65/70 project was first announced our neighborhood was told that the urban forest, that we helped KIBI plant on the highway right of way, would be replaced upon project completion. HCNA sees those trees as essential and integral part of softening the highway experience for our neighborhood. These trees will grow and produce a natural sound barrier that includes the added benefit of air filtration and a more pleasant visual experience.

HCNA would like to go on record as recommending against solid sound walls within the city loop of the interstate. Our neighborhood is opposed to creating a greater wall through downtown, especially with the minimal reduction of sound that is offered by these barriers. HCNA believes the introduction of new “next-gen” road surface materials and new bridge designs mentioned in the Traffic Noise Technical Report will provide similar noise reduction and be less impactful to our skyline. Money saved from not installing sound barrier walls, which are very expensive, should be reinvested not only in innovative cutting technologies such as pavement, pavement grooving, joint-less concrete bridges, and continuing to build on the urban forest that has already been serving our community.

the Traffic Noise Analysis Procedure if there are noise sensitive receptors on the opposite side of the roadway. These barriers have a minimum noise reduction coefficient (NRC) of approximately 0.70. A noise reduction coefficient is an average rating of how much sound an acoustic product can absorb. An acoustic product with a 0.70 NRC rating means that 70% of sound in the space is absorbed, while the other 30% is reflected.

The traffic noise model used by INDOT is designed to account for sound passing over the noise barriers. Field measurements at ground level were not used directly in estimating noise levels. They were only used to validate the traffic noise model for existing conditions before applying it to future designs.

See the response to “Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019” and “Interstate Business Group – Paul Knapp – October 18, 2019” for additional information about INDOT’s Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.

INDOT’s Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the Holy Cross Neighborhood Association (HCNA) is still important as general project input, which is always welcomed by INDOT.

<b>Property Owner – Luke Leising – October 30, 2019</b>	
I would like to strongly support the concept of utilizing a East-West trail/walk path along the north side of I65-70 connecting the Monon Trail all the way to Penn as a mitigation strategy. I know that the greater height/visibility and noise only contributes to the lack of accessibility and walkability. Utilizing some of this space to engage the community, provide access and build interconnections would be an excellent mitigation strategy. I also know that this is supported by many of the land owners (like myself) along the route. I see this as a way that the project could leave a stronger neighborhood through this challenging project.	Thank you for the comment. The provision of an east-west trail from the Monon Greenway to Pennsylvania Street was identified as a potential amenity during the CSS process.  Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation. One possible mitigation measure includes funding assistance to the Benjamin Harrison Presidential Site for an Old Northside Connector trail from the Talbot Street alley west to Pennsylvania Street.
<b>National Trust for Historic Preservation – Betsy Merritt – October 30, 2019</b>	
<i>The version of the Update Memo attached to your October 11 email does not include any of the Attachments. I'm especially interested in the one that apparently responds to the comments regarding adverse effects on the Indiana Landmarks center.</i>  <i>I also checked the project website, but couldn't find it there either. Would it be possible to send the Attachments by email?</i>	<i>The Attachments to Section 106 Update Memo #6 were sent to Ms. Merritt on October 31, 2019.</i>
<b>Cottage Home Neighborhood Association – Crystal Rehder – November 1, 2019</b>	
Putting in my request, as a resident in Cottage Home, that barrier walls not be installed anywhere along the inner loop of I-65/70.	INDOT's Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from individuals is still important as general project input, which is always welcomed by INDOT.  See the response to "Interstate Business Group – Paul Knapp – October 18, 2019" for additional information about INDOT's Traffic Noise Analysis Procedure.
<b>Indiana Department of Natural Resources – Chad Slider – November 1, 2019</b>	
Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108); implementing regulations at 36 C.F.R. Part 800, and the "Programmatic Agreement (PA) Among the Federal Highway Administration, the Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana" ("Indiana Minor Projects PA"); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code ("IAC" 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the above-referenced submission, dated and received on October 11, 2019.  Thank you for providing us with copies of the Update	Thank you for your review and concurrence.

<p>Memo #6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report. We agree with the results of your re-examination of effects, in light of consulting party feedback, that the St. Joseph Historic District will also be adversely affected by the undertaking. We also note that additional adverse effects to historic properties may result from the potential construction of noise barriers within the project area.</p>	
<p>While we appreciate the benefit of noise reduction to the adjacent sound receptors, we remain deeply concerned about the visual effect of noise walls on the setting of historic resources, particularly within the St. Joseph Neighborhood, Chatham-Arch, and Old Northside historic districts. We also note the potential for additional adverse effects if noise barriers are constructed adjacent to the Massachusetts Avenue Commercial Historic District and Lockerbie Square Historic District. We believe that the inclusion of noise barriers up to 19 feet above the freeway would introduce an additional and severe adverse effect to the character and setting of these resources, and greatly amplify the visual impact of the existing interstate highway intrusion within the historic districts. Construction of tall noise barriers would serve to further isolate historic districts and adjacent structures, and strengthen the perceived and actual separation between neighborhoods on either side of the highway. During the October 29, 2019 consulting parties meeting at Ivy Tech Community College Culinary and Conference Center, several consulting parties noted their opposition to the construction of noise barriers adjacent to historic properties, also expressing concern that some of the city's best gateway scenic views of downtown, its architecture and neighborhoods might be partially or completely blocked to visitors and passing travelers along the I-65/ I-70 North Split.</p>	<p>Observations regarding adverse effects of noise barriers on the historic districts cited are consistent with the recommendations provided in the Traffic Noise Barrier Addendum to Assessment of Effects Report.</p> <p>Preliminary mitigation measures for adverse effects to historic properties, including those from possible noise barriers, are identified in the Section 106 800.11 documentation.</p>
<p>In regards to archaeology, as previously stated, 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. However, as was mentioned during the October 29 consulting parties meeting, it is our understanding that an addendum report will be submitted for our review later this year.</p>	<p>The Phase Ia Archaeology Report Addendum was sent to the SHPO for review on November 7, 2019.</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-DHPA 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>In terms of mitigation proposals, we believe that the preliminary list shown during the meeting included many good ideas. The Indiana SHPO would be supportive of these proposals and looks forward to further discussion and consultation on means to avoid, minimize and mitigate effects of the undertaking. We are particularly interested in learning the thoughts and ideas of other consulting parties as part of a robust discussion. From our perspective, this is where stakeholder input is most critical in obtaining substantial and meaningful mitigation to offset impacts and benefit historic properties and residents of the affected districts.</p>	<p>Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation. INDOT looks forward to further discussion with the SHPO and consulting parties regarding mitigation measures.</p>
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**Holy Cross Neighborhood Association – Pat Dubach – November 3, 2019**

<p>Our business has been located on the East Side since 2008, and I have lived on the Near Eastside since 2002. As you know we have experienced many positive steps moving forward as a community. One of the most memorable steps forward was the removal of the Market Street Ramp on Market Street. The removal was a major step in the positive developments which helped connect our community with downtown Indianapolis. Collaborating with Keep Indianapolis Beautiful, Holy Cross Community installed trees along the interstate to help soften our western gateway connection to downtown. Over the years, the Holy Cross Community has helped maintain our gateway and the trees have helped soften the interstate presence.</p> <p>Now, to see the wall being proposed to be added as a "sound barrier" is a huge disappointment. Our biggest sound concern is from CSX, not the interstate. In addition to the sound barriers, it looks like we will still have a steep grade building up to the interstate. Currently, we can only maintain the flat surface, and the state mows down the steep grade every two years. Sure seems the design could have maintenance in mind. Why not put the budget to landscaping rather than wasting it in a useless sound barrier that is not wanted and very ugly. This makes the Market Street Ramp look good.</p> <p>I would also like to understand why our trees have to be removed.</p>	<p>See the response to “Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019” and “Interstate Business Group – Paul Knapp – October 18, 2019” for additional information about INDOT’s Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.</p> <p>Trees may require removal for access during construction. Tree planting not required by Section 106 mitigation may occur in areas where trees were removed. INDOT is determining possible tree planting areas as part of the Context Sensitive Solutions (CSS) process.</p>
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**HUNI – Garry Chilluffo – November 7, 2019**

<p>Historic Urban Neighborhoods of Indianapolis (HUNI) is a coalition of over 25 historic neighborhoods whose mission is to support the preservation, revitalization and interests of Indianapolis’ urban historic neighborhoods. For the nearly 40 years that we have been in existence, there has progressively been significant revitalization of our neighborhoods, many of which were originally devastated with the construction of the interstates through downtown. As you know, the North Split project goes through 8 of our neighborhoods. We think that we can all</p>	<p>INDOT’s Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the Historic Urban Neighborhoods of Indianapolis (HUNI) is still important as general project input, which is always welcomed by INDOT.</p> <p>See the response to “Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019” and “Interstate Business Group – Paul Knapp – October 18, 2019” for additional information</p>
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<p>agree that this is an opportunity to rectify some of that earlier devastation by the reconstruction of I-65/70 in a way that focuses on reconnecting these neighborhoods in a positive way.</p> <p>Recently, INDOT sent out surveys to those people who live and/or own property within 500 feet of designated areas along the interstates to determine whether the rebuilding of the roadbeds would include tall sound barriers. While reduction of noise is paramount with the reconstruction, HUNI opposes such barriers. We strongly support finding other ways to reduce the noise.</p> <p>These sound barriers put us right back to walling in the core of downtown, one of the main reasons HUNI joined the Rethink Coalition. The walls are aesthetically boring, at best, and provide only a modest improvement on noise reduction (5-7 dB). We appreciate INDOT's plan to use new age paving which will dampen the noise considerably. We also encourage seeking ways to reduce the speed and loud truck breaking. Additionally, we are strongly recommending an urban forest of trees. Reduction in sound by trees is debatable, but it certainly creates a more acceptable visual barrier and contributes to carbon reduction and reduces run off over burdening the sewer system.</p>	<p>about INDOT's Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.</p>
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**Indianapolis Historic Preservation Commission – Meg Purnsley – November 8, 2019**

<p>I have reviewed the above referenced submission dated and received on October 11, 2019. Thank you for the update memo #6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report. Per your findings, the following National Register Historic Districts and sites are adversely affected by the proposed undertaking:</p> <ul style="list-style-type: none"> <li>- Old Northside Historic District and the Morris Butler House</li> <li>- St. Joseph Historic District</li> <li>- Chatham-Arch Historic District</li> <li>- Massachusetts Avenue Commercial Historic District</li> <li>- Lockerbie Square Historic District (if NB7 is constructed)</li> </ul> <p>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, an Adverse Effect must be found.</p> <p>Excluded from the list are the following historic areas locally protected by the Indianapolis Historic Preservation Commission per state statute I.C. 36-7-11.1 that are also</p>	<p>For clarification, the Massachusetts Avenue Commercial Historic District Section 106 finding is No Adverse Effect, unless Noise Barrier 7 (NB7) is constructed, similar to the Lockerbie Square Historic District. If NB7 is constructed, there would be an Adverse Effect to the Massachusetts Avenue Commercial Historic District.</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>
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<p>adversely affected by the proposed undertaking due to their eligibility for inclusion in the National Register of Historic Places:</p> <ul style="list-style-type: none"> <li>- Old Northside Historic Area</li> <li>- St. Joseph Historic Area</li> <li>- Chatham-Arch/Massachusetts Avenue Historic Area</li> <li>- Lockerbie Square Historic Area</li> <li>- Cottage Home Conservation Area</li> </ul>	
<p>Specifically, the construction of the following proposed noise barriers, which will be up to 19 feet above the freeway, creates a severe visual adverse effect by diminishing the above mentioned historic areas feeling, setting and character and the properties/historic resources within them:</p> <ul style="list-style-type: none"> <li>- NB4</li> <li>- NB5</li> <li>- NB7A</li> <li>- NB7B</li> </ul>	<p>Observations regarding adverse effects of noise barriers on the National Register-listed and National Register-eligible historic districts cited are consistent with the recommendations provided in the Traffic Noise Barrier Addendum to Assessment of Effects Report.</p>
<p>While I appreciate the mitigation efforts suggested by the consulting parties, exclusion of the barriers entirely is also a possibility. It is premature to determine if noise barriers are necessary, and a survey of the adjacent sound receptors not be performed until after one year of completion of the reconstruction project [sic], particularly since noise reduction efforts are already being made with reconstruction project.</p>	<p>INDOT's Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefited receivers prior to construction of the project. Input is requested prior to construction of a project so noise barriers are accounted for in the project design as appropriate. A survey of the benefited receptors will not be completed after the North Split Project is constructed.</p>
<p>That being said, the following mitigation efforts proposed by the consulting parties during the meeting on October 29, 2019 included many good ideas:</p> <p><u>Vegetation/Side slopes</u>  CSS-related tree plantings, wall and side slope treatments  Integrate walls and make them no higher than 8 feet  Tree preservation</p> <p><u>Place-making Ideas</u>  Directional signage  Place-making installations  Old Northside Trail  Areas for public art</p> <p><u>Local Infrastructure Improvements</u>  Repave city streets before and after construction  Repair and/or provide new sidewalk connections  Protect brick portion of 10<sup>th</sup> Street during construction</p> <p><u>Financial Assistance</u>  Funding for maintenance  Funding for revenue loss during construction</p>	<p>Comment noted regarding the potential benefits of mitigation efforts proposed by the consulting parties during the meeting on October 29, 2019.</p> <p>Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation. INDOT looks forward to further discussion with consulting parties regarding mitigation measures.</p>

<p><u>Pedestrian/Bicycle Connectivity</u>  Improvements to Alabama St. underpass for safety, cleanliness, lighting, noise, runoff, encampments  Integrate sustainable transportation modes at the ground level – walking and bicycling  Integrate greenway system along interstates  Ensure 10<sup>th</sup> St. Payne Connection is equal to or better than existing  Wider sidewalks, traffic buffers, lighting for underpasses  Security camera surveillance  Underpasses with no nooks, crannies and no drainage outlet onto walking space</p> <p><u>Noise/Vibration</u>  Enact/enforce vehicle noise regulations for truck engine-braking and deficient exhaust systems  Repair vibration damage from construction  Insulation/sound mitigation for historic resources  Taller safety barriers</p>	
<p>To quote Deputy SHPO Beth McCord, “construction of tall noise barriers would serve to further isolate historic districts and adjacent structures and strengthen the perceived and actual separation between neighborhoods on either side of the highway.” Furthermore, several consulting parties expressed concern and opposition to the noise barriers at the October 29<sup>th</sup> consulting parties meeting citing some of the city’s best gateway scenic views of downtown, its architecture and neighborhoods might be partially or completely blocked to visitors and passing travelers along the I-65/I-70 North Split. Similar opposition to the noise barriers was shared by the Chatham Arch Neighborhood Association at their October 22<sup>nd</sup> meeting in which HNTB presented.</p>	<p>These comments regarding possible noise barrier construction are noted.</p>
<p><b>Old Northside Neighborhood Association – Hilary Barnes – October 31, 2019</b></p>	
<p><i>Do you know how many of the 58 benefitted households in the ONS are tenants versus homeowners? Or rather, how many of that 58 are individual apartments versus homes? And is the cost of the barrier divided among the individual apartments within the same apartment building, plus the owner?</i></p> <p><i>For purposes of the cost analysis: If an apartment building has 8 units, does that equate to 8 benefitted properties that the cost is divided between? Or does that equate to 16 benefitted properties (including the owner's tallies)? Or does the owner of the apartment building not count for purposes of the cost analysis?</i></p> <p><i>Also, why do some single family homes get 2 receptors? For instance, R159 and R160 each get two receptors, but these are just single family homes with no tenants.</i></p>	<p><i>1. Do you know how many of the 58 benefitted households in the ONS are tenants versus homeowners? Based on our search of property records for benefitted receivers, approximately 13 of the benefitted dwelling units were not owner occupied.</i></p> <p><i>2. Or rather, how many of that 58 are individual apartments versus homes? Among the benefitted receivers within the ONS there are several apartment complexes and multiple duplexes. These multifamily dwellings are both owner occupied and tenant occupied. We would consider all of these homes. The noise analysis and corresponding survey does not differentiate between dwelling units that are apartments or detached houses.</i></p> <p><i>3. And is the cost of the barrier divided among the individual apartments within the same apartment building, plus the owner?</i></p>

*And R188, R189, R190, and R193 all have two receptors despite being single family homes. ONS would need 43 benefitted receptors to make it economically feasible.*

*Also, for a duplex, how does the sound model work for the north side of the duplex? Does the model evaluate them like they are two separate buildings, or does it just evaluate the structure as a whole? It seems their sound would be blocked by the south side of the building, similar to how some homes are not benefitted receptors because their sound is blocked by an adjacent home. I ask because there are several duplexes on the east side of New Jersey that each get two receptors.*

*The cost effective calculation was based on individual dwelling units with an area of frequent outdoor human use (such as a balcony, patio or yard.). Ownership of the property was not considered in the cost effective calculation.*

*4. For purposes of the cost analysis: If an apartment building has 8 units, does that equate to 8 benefitted properties that the cost is divided between?*

*If an apartment building has 8 units, and all units have an area of frequent outdoor human use, then all 8 units are considered in the cost effective calculation.*

*5. Or does that equate to 16 benefitted properties (including the owner's tallies)? Or does the owner of the apartment building not count for purposes of the cost analysis? The ownership of the properties does not factor in to the cost effective calculation. If all 8 units were benefitted and not owner occupied then 16 surveys would be sent out to solicit input. Two surveys per unit, one to the tenant and one to the owner.*

*6. Also, why do some single family homes get 2 receptors? For instance, R159 and R160 each get two receptors, but these are just single family homes with no tenants. Some receivers represent multiple receptors. This was done where dwelling units were close geographically and were able to be represented by a single dwelling unit. R160 represents 1232 N Park Ave and 1224 N Park Ave. R159 was identified as a 2 unit dwelling in the report. This is an error in the report and will be corrected.*

*7. And R188, R189, R190, and R193 all have two receptors despite being single family homes. ONS would need 43 benefitted receptors to make it economically feasible. Receivers R188, R189, and R193 each represent 2 homes, specific addresses listed below. R190 will be revised to only represent 1221 Alabama Street in the final report. This revision will not affect the overall cost effectiveness of the barrier.*

*R188-2-1205 and 1211 Alabama Street  
R189-2-1213 and 1219 Alabama Street  
R190-2-1221 Alabama Street  
R193-2- 1231 and 1235 Alabama Street*

*8. Also, for a duplex, how does the sound model work for the north side of the duplex? Does the model evaluate them like they are two separate buildings, or does it just evaluate the structure as a whole? It seems their sound would be blocked by the south side of the building, similar to how some homes are not benefitted receptors because their sound is blocked by an adjacent home. I ask because there are several duplexes on the east side of New Jersey that each get two receptors.*

*The model predicts noise levels at areas of frequent outdoor use, which is where the receiver is placed. The model evaluates the structure as a whole. The areas of outdoor use at the receivers you are referencing are in the backyard of these residences and there would be no noise reduction from the southern unit on the area of frequent use for the northern unit.*

**Indiana Department of Natural Resources – Chad Slider – December 9, 2019**

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108); implementing regulations at 36 C.F.R. Part 800, and the “Programmatic Agreement (PA) Among the Federal Highway Administration, the Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana” (“Indiana Minor Projects PA”); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code (“IAC” 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the above-referenced archaeological report, which was submitted under your November 7, 2019, Review Request Submittal Form, and Anu Kumar’s (INDOT) November 7, 2019, cover letter; all of which we received on November 8, 2019.

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 additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas.

Additionally, 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 additional portions of the proposed area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were not subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas. However, this identification is

Thank you for your review and concurrence.

<p>subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature. If archaeological deposits are encountered from the post-contact period, they will be evaluated regarding their eligibility for the NRHP in consultation with the staff of the Indiana SHPO. Please contact our office if such deposits are encountered. The archaeological recording must be done in accordance with the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716) and a report of the archaeological documentation must be submitted to our office for review and comment.</p>	
<p>Furthermore, in regard to archaeological resources within the additional portions of the proposed project area described in the archaeological report as Area 8, it is our understanding that measurements of elements (i.e., the lengths of rail ties) of archaeological features at Site 12-Ma-1062 (an abandoned rail bed containing, in situ, rail ties, rails, baseplates, and spikes; and portions of which lie within the Old Northside Historic District [NR-0716]) differ from those of known, similar features and/or from historically documented examples. Because of this, the archaeological report must be revised to include historically documented measurements of such elements, as well as detailed recordation (e.g, scaled drawings) and description of these features. Additionally, if the entirety of the documentation relating to measurements of such features is to be found in a personal communication recorded during current archaeological investigations, then a fuller explanation of the differences will be appropriate. Furthermore, a more detailed discussion of the differences between elements of "high speed" switching and "slow speed" switching should be included, as well as, if possible, a clearer interpretation and discussion of such features at Site 12-Ma-1062.</p> <p>Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.</p>	<p>The Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey Report was revised to include the requested information and hand delivered to the Indiana SHPO on December 13, 2019.</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-DHPA 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>Indiana Department of Natural Resources – Chad Slider – December 10, 2019</p>	
<p>Pursuant to Section 106 of the National Historic</p>	<p>Thank you for your review and concurrence. No other</p>

<p>Preservation Act of 1966, as amended (54 U.S.C. § 306108); implementing regulations at 36 C.F.R. Part 800, and the "Programmatic Agreement (PA) Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana" ("Indiana Minor Projects PA"); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code ("IAC") 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the update memo # 7, which was submitted November 7, 2019, and received on November 8, 2019.</p> <p>For our comments regarding the Addendum phase Ia archaeological records check and reconnaissance survey report (Schwarz, 11/6/2019), please refer to the December 9, 2019 letter to Harry Nikides of ASC Group (enclosed).</p> <p>It is our understanding that since issuance of the Noise Barrier Addendum one additional noise barrier (NB3W) has been identified. If constructed, this noise barrier would extend along the north edge of the shoulder of westbound I-70 from approximately Lewis Street to Commerce Avenue. It would have an average height of 16 feet. The John Hope School No. 26 at 1301 E. 16th Street is located within view of the potential noise barrier. Additionally we note that the historic property boundary is approximately 207 feet from I-70 and the school building is approximately 340 feet away from edge of pavement. The consultant's assessment that the NB3W barrier would not adversely affect the John Hope School appears reasonable based on the information at hand, unless another consulting party provides information to the contrary.</p>	<p>consulting parties provided comments regarding NB3W and effects to the John Hope School No. 26.</p>
<p><b>Indiana Department of Natural Resources – Chad Slider – December 16, 2019</b></p>	
<p>Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108); implementing regulations at 36 C.F.R. Part 800, and the "Programmatic Agreement (PA) Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana" ("Indiana Minor Projects PA"); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code ("IAC") 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the above-referenced</p>	<p>Thank you for your review and concurrence.</p>



archaeological report, which was submitted along with your December 13, 2019, Review Request Submittal Form, all of which we received on December 13, 2019.

As previously indicated, 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 additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas.

Additionally, as previously indicated, 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 additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were not subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas. However, this identification is subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature. If archaeological deposits are encountered from the post-contact period, they will be evaluated regarding their eligibility for the NRHP in consultation with the staff of the Indiana SHPO. Please contact our office if such deposits are encountered. The archaeological recording must be done in accordance with the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716) and a report of the archaeological documentation must be submitted to our office for review and comment.

Furthermore, based on the submitted information and the documentation available to the staff of the Indiana SHPO, there is insufficient information regarding archaeological site 12-Ma-1062 (an abandoned rail bed containing, in situ, rail ties, rails, baseplates, and spikes; and portions of which lie within the Old Northside Historic District [NR-0716]) to determine whether it is eligible for inclusion in the NRHP. However, we concur with the opinion of the archaeologist, as expressed in the archaeological report, that the portions of archaeological site 12-Ma-1062 that lie within Area 8 of the proposed project area do not appear

Thank you for your review and concurrence. The portions of site 12-Ma-1062 that lie outside the proposed project area will be clearly marked so that they are avoided by all ground-disturbing project activities.

<p>to warrant additional archaeological investigations. However, the portions of archaeological site 12-Ma-1062 that lie outside the proposed project area should be clearly marked so that they are avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the DHP A for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archeology and Historic Preservation" (48 F.R. 44716).</p> <p>Thank you for submitting the archaeological site survey record form for archaeological site 12-Ma-1062 to the Indiana DHPA SHAARD system database. It will be reviewed.</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-DHPA 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>