



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

May 18, 2020

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 #12 and Final Memorandum of Agreement (MOA)

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 11th and 12th 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.

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 change should be made to the consulting parties list for processing the dual review submission:

- Mr. Ken Avidor has replaced Mr. Shawn Miller as the Chatham-Arch Historic District representative.

Contact information for consulting parties is included in Attachment A.

Draft Memorandum of Agreement (MOA) Comments

INDOT and FHWA have reviewed the comments from Section 106 consulting parties on the Draft Memorandum of Agreement (MOA) sent in Section 106 Update Memo #10. Responses to all comments are included in Attachment B.

Final Memorandum of Agreement (MOA)

The Final Section 106 Memorandum of Agreement (MOA) has been prepared for the project and is ready for signatures. The MOA includes proposed mitigation stipulations for adverse effects to historic properties. The Final MOA is available in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE).

FHWA, the State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP) are required to sign the MOA. INDOT and other organizations with responsibilities in the MOA are invited to sign the MOA. The MOA is considered executed once the required and invited signatories have signed it. Please provide invited signatory signatures by May 22, 2020.

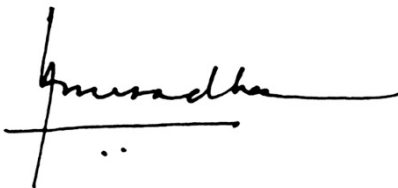
Consulting parties are encouraged to sign the MOA as a concurring party (page 25 of the MOA); however, you are not required to do so under Section 106. If you prefer a hard copy of the MOA, please respond to this email with your request within seven (7) days. Please provide concurring party signatures by June 30, 2020.

MOA signature pages may be provided via email or hard copy to the address below. 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,



Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

- Attachment A - Consulting Parties List & Contact Information
- Attachment B - Consulting Party Comments & Responses

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
Ken Avidor, 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
Gavin Thomas, 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 #12

Attachment A

**Consulting Parties List
& Contact Information**

I-65/I-70 North Split Interchange Reconstruction
 Des. Nos. 1592385 & 1600808
 Consulting Parties List (5/12/2020)

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	Alesha Cerny	Historian/Cultural Resources	alesha_cerny@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/City of Indianapolis	Meg Purnsley	Administrator	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 (5/12/2020)

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	Ken Avidor	Board Member	ken.avidor@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	Gavin Thomas	Vice President of Development	Gavin.Thomas@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 (5/12/2020)

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.	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 Community Development Corporation	Amina Pierson	Executive Director	apierson@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 #12

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 March 11, 2020 to May 12, 2020 to Section 106 Update Memo #10, the Draft Memorandum of Agreement (MOA), Section 106 Update Memo #11, and the revised MOA

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

Comment	Response
Historic Urban Neighborhoods of Indianapolis – Marjorie Kienle – March 24, 2020	
<p><i>My computer was down and our computer guy could not get on remotely until last evening. Therefore, I was unable to participate in the meeting. I need to express a concern. You listened to my concern about the New York Street and Washington Street bridges and changed them but not in the Section 106 document. We all know that if it is in Section 106 it will happen but if not, it will be a “nice to have” and could be value engineered out. How can we add New York and Washington to the others that are listed in the Section 106 document? The New York Street bridge is an important part of Lockerbie Square and is definitely a mitigation strategy.</i></p> <p><i>Page 9 of the MOA: connectivity improvements: Bthe connectivity between Lockerbie Square and Holy Cross is not listed.</i></p>	<p><i>We understand from a community perspective why those underpass locations are important which is why they are called out as major gateways in the Aesthetic Design Guidelines. However, the Section 106 MOA includes mitigation specifically for adverse effects to historic properties. The Lockerbie Square Historic District and the Holy Cross Historic District did not have adverse effects as part of the project under Section 106, therefore this measure will not be included in the Section 106 MOA.</i></p> <p><i>Major gateway treatments are included at New York and Washington in the Aesthetic Design Guidelines. The MOA requires INDOT, and their design-build team, to follow the Aesthetic Design Guidelines in project development. We do not anticipate these treatments being removed from the project.</i></p>
Massachusetts Avenue Merchants Association – Meg Storrow – April 7, 2020	
<p><i>Does the presentation you used for the March 23 meeting below supersede and replace the North Split Project Aesthetic Design Guidelines (Attachment C) to the Draft Section 106 MOA?</i></p> <p><i>I thought the Monon connection was different. In the later presentation, there was a slide that showed the southwestern portion of the Monon Detour proposed or under consideration as a permanent feature. Maybe I missed it, but that page is not in the MOA attachment.</i></p>	<p><i>No. The information from the presentation regarding the Aesthetic Design Guidelines should be the same as what is included in Attachment C.</i></p> <p><i>That’s correct. We are proposing a different trail connection southwest of the interchange. Because the exact location was still being determined, it was not included in the Aesthetic Design Guidelines. However, once the location has been finalized it will be provided to the design-build team for construction. If INDOT, the City, FHWA, and consulting parties are comfortable with the new location, it will become a commitment for the project.</i></p>
Massachusetts Avenue Merchants Association – Meg Storrow – April 10, 2020	
<p><i>Please accept this letter of support for the Rethink 65/70 Coalitions’ response to the Section 106 Draft MOA dated March 9, 2020 and the Update Memo #10 dated March 11, 2020.</i></p> <p><i>We concur with the Rethink 65/70 Coalition letter dated April 10, 2020 and their comments on the Aesthetic Guidelines, and attach it to our response, especially as it</i></p>	<p><i>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</i></p>

<p>relates to:</p> <ol style="list-style-type: none"> 1. Making the southwest segment of the Monon Trail detour permanent. 2. Utilizing the earthen berms per the Rethink comments 3. We support the use of terracing to keep walls minimized per the Rethink suggestions. 	
Massachusetts Avenue Merchants Association – Meg Storrow – May 4, 2020	
<p><i>Thanks you for forwarding. However, just a quick note. The Mass Ave Merchants Association will need to review the revisions to the Aesthetic Design Guidelines before we are comfortable signing off on the MOA.</i></p>	<p><i>We want to provide some clarifications on the North Split MOA.</i></p> <p><i>INDOT provided the Revised MOA to consulting parties to see the final changes. We encourage consulting parties to sign the MOA as a Concurring Party, though this is not a requirement of Section 106. We hope parties do sign in recognition of our extended coordination process, but you are not required to do so. Recognizing the need for each party to coordinate internally, Concurring Party signatures can be accepted until the end of June.</i></p> <p><i>Regarding the Aesthetic Design Guidelines, all recent comments and suggestions resulting from Section 106 consultation and public involvement will be provided to the landscape architect on the design-build team for consideration in the final aesthetic and landscape design.</i></p> <p><i>INDOT will not be developing the Aesthetic Design Guidelines further because the project is moving on to the design phase.</i></p> <p><i>Per the MOA, consulting parties will be provided a draft landscape and side slope plan for review and comment during the design process.</i></p> <p><i>The Aesthetic Design Guidelines are located here: https://northsplit.com/wpcontent/uploads/2020/03/North-Split-Aesthetic-Design-Guidelines.pdf</i></p>
Massachusetts Avenue Merchants Association – Meg Storrow – May 8, 2020	
<p><i>Can you explain why you asked for comments on the Aesthetic Design Guidelines then?</i></p> <p><i>We all spent considerable time and effort to understand them and give you honest feedback.</i></p>	<p><i>We appreciate your review on both the Draft MOA and Aesthetic Design Guidelines. Comments on the Draft MOA have been incorporated into the revised MOA where possible. Comments on the Guidelines will be provided for consideration in the final aesthetic and landscape design.</i></p>
Benjamin Harrison Presidential Site – Charles Hyde – April 7, 2020	
<p>In regards to the current Draft MOA (March 9, 2020 version), we appreciate inclusion in the proposed remediation efforts:</p> <p>INDOT shall provide \$100,000 to the Benjamin Harrison Presidential Site towards the construction of the Old Northside Connector, a pedestrian and bicycle path to connect the alley south of the Benjamin Harrison Presidential Site to Pennsylvania Street. This stipulation will be implemented through an agreement between</p>	<p>INDOT will provide \$190,000 in funding to allow the Benjamin Harrison Presidential site match the grant funding for the Old Northside Connector Neighborway.</p>

<p>INDOT and the Benjamin Harrison Presidential Site.</p> <p>However, working in partnership with our project designers at RATIO Architects, we anticipate that the total cost of the Old Northside Connector Neighborway will be \$380,000.</p> <p>Considering the specific scope and related expense of the Neighborway component to be completed as designed—and in a matter befitting both the State of Indiana and a National Historic Landmark honoring the only president elected from Indiana—we’d respectfully request an additional apportionment of \$90,000, for a total allocation by INDOT of \$190,000. In turn, this will allow the Benjamin Harrison Presidential Site to fully leverage a 1:1 matching grant made by the Arthur Jordan Foundation for the project and double the total funds allocated to the Neighborway’s completion to \$380,000.</p> <p>You will find attached letters of support from an array of neighborhood and city partners in support of the project. We applaud the efforts you are making on behalf of improving transportation infrastructure—vehicular, pedestrian, and bicycle—and look forward to partnering together to help take the project to the next level.</p>	
<p>Advisory Council on Historic Preservation – Mandy Ranslow – April 9, 2020</p>	
<p>At the request of the Indiana Department of Transportation and the Federal Highway Administration (FHWA), the Advisory Council on Historic Preservation (ACHP) has reviewed the draft Memorandum of Agreement (MOA) for the referenced project. The draft MOA was submitted as part of FHWA’s compliance with Section 106 (54 U.S.C. § 306108) of the National Historic Preservation Act (54 U.S.C. § 300101 et seq.) and its implementing regulations, “Protection of Historic Properties” (36 C.F.R. Part 800).</p> <p>While the draft MOA is a good start, additional edits will be needed before the MOA can be finalized for execution. Edits and comments have been made in the attached document. In particular, we encourage FHWA to consider including a reporting and monitoring stipulation in the MOA. This stipulation will ensure that consulting parties are kept apprised of the MOA’s implementation, and receive regular communication regarding the undertaking’s progress.</p> <p>The ACHP looks forward to continued consultation on this MOA. Should you have any questions regarding our comments, please contact Mandy Ranslow at (202) 517-0218, or via e-mail at mranslow@achp.gov.</p>	<p>Thank you for your review. The comments have been addressed and revisions incorporated into the final MOA. A reporting and monitoring stipulation has been added to the MOA.</p>
<p>[Page 3 of Draft MOA, Regarding: WHEREAS the FHWA, in consultation with the Indiana SHPO, has determined, pursuant to 36 C.F.R. Section 800.4(c), that</p>	<p>The two lists below listed the National Register of Historic Places (NRHP) listed and eligible properties separately. These lists have been removed. The National Historic</p>

<p>the properties listed below are eligible for inclusion in the National Register of Historic Places (“NRHP”):]</p> <p>How do the 2 lists below differ from the one above? These are quite lengthy lists. Maybe it would be cleaner just to list the adversely impacted properties/districts like just using the first full WHEREAS clause on page 4?</p>	<p>Landmarks were included in a separate Whereas clause per the recommendation of the National Trust of Historic Preservation.</p>
<p>[Page 5 of Draft MOA, Regarding: WHEREAS the following agencies, organizations, or individuals have participated in the consultation; and]</p> <p>These are all listed in Attachment B. You could just reference the attachment and eliminate the list.</p>	<p>List was removed and reference to Attachment B was added.</p>
<p>[Page 6 of Draft MOA, Regarding Aesthetic Design Guidelines]</p> <p>Did the consulting parties have an opportunity to comment on these?</p>	<p>The Aesthetic Design Guidelines were provided to the consulting parties during review of the Draft MOA. Consulting parties provided comments on the Aesthetic Design Guidelines as well as the Draft MOA. Comments on the Aesthetic Design Guidelines will be provided to the design-build team for consideration during the design of the project.</p> <p>The Aesthetic Design Guidelines are a result of a robust Context Sensitive Solutions (CSS) process that involved 2 rounds of neighborhood meetings, including the historic neighborhoods adversely affected by the project. The first round involved Visioning sessions to determine what the neighborhoods viewed as important to their neighborhood and the project. During the second round, preliminary design treatments were brought to the neighborhoods to get their feedback. This feedback was taken into consideration in the development of the Aesthetic Design Guidelines. The Rethink 65/70 Coalition and many of the Section 106 consulting parties, including the SHPO, were involved in the CSS process. In total, the CSS process included 12 neighborhood workshops with 14 neighborhoods and 2 local business groups. Over 400 residents were engaged and over 2,700 comments were received.</p>
<p>[Page 11 of Draft MOA, Regarding Stipulation III.A.2.]</p> <p>What if new consulting parties come to light later?</p>	<p>New consulting parties were added to this stipulation.</p>
<p>[Page 12 of Draft MOA, Regarding Stipulation III.A.4.]</p> <p>There should also be a human remains stipulation within the administrative stipulations in the event remains are found outside of an archaeological survey.</p>	<p>A human remains stipulation was added to the administrative stipulations.</p>
<p>[Page 14 of Draft MOA, Regarding IV. Administrative Provisions]</p> <p>A monitoring and reporting clause must be added.</p>	<p>Stipulation IV.A Monitoring of Compliance was added to the MOA.</p>
<p>State Historic Preservation Officer – Beth K McCord – April 9, 2020</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,</p>	<p>Thank you for your review.</p>

<p>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 Update Memo No. 10, which was submitted to us, and received by us, on March 11, 2020.</p>	
<p>Thank you for providing the update memo #10 and the draft memorandum of agreement ("MOA") for review. It is our understanding that all project modifications described in the last update memo will take place within existing right-of-way that was previously disturbed by transportation infrastructure construction. We appreciate this clarification. We also note that Noise Barrier 3W (NB3W) to be constructed along the north side of westbound I-70 is anticipated to be located within the existing road slope. There are plans to conduct additional archaeology at the toe of the slope to provide the design-builder greater flexibility. The results of this investigation will be provided to the Indiana SHPO for review, and stipulations have been included to reflect this in the draft MOA.</p>	<p>The results of the additional archaeology investigation were emailed to the Indiana SHPO on April 16, 2020 for review and comment.</p>
<p>We appreciate the thought, input and refinements that are reflected in the current version of the North Split Aesthetic Design Guidelines.</p> <p>Regarding the earthen berms in the northwestern and southwestern portions of the interchange, while we note the potential value for visual and auditory mitigation, we would defer to the views of other consulting parties within the affected neighborhoods on the desirability for retention of berms.</p> <p>In terms of vibration monitoring, we understand that impacts are not expected outside of 140 feet from the project area, and that monitoring will focus on the closest structures with the highest potential for impact.</p> <p>It is our understanding that terraced side slopes will not be utilized due to concerns with cost, ongoing maintenance, and the anticipated need to remove existing vegetation for construction.</p>	<p>Your understanding is correct. Recent consulting party comments indicated general support for the earthen berms as long as they were softened and more natural looking. Consulting parties also indicated they would like to review the landscaping plan once available. Based on this input, the following stipulations have been added to the MOA:</p> <p>Berms shall be included in the interchange design to provide visual shielding and noise reduction from the interchange ramps for the Old Northside and Chatham-Arch Historic Districts.</p> <ol style="list-style-type: none"> a. The berms shall be located in the northwest quadrant of the interchange, extending from approximately 14th Street to College Avenue, and in the southwest quadrant of the interchange, extending from College Avenue to 10th Street. b. The berms shall be sculpted into a softer, more natural shape and planted with trees such that they do not appear as abandoned "roadbeds". The proposed shape of the berms shall be included in the draft landscape and side slope plan provided to consulting parties for comment. c. All other remnants of previous "roadbed" use shall be

	removed from areas that will no longer serve such a use, including those adjacent to the O'Bannon Soccer Park.
<p>In terms of archaeological resources, 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 portions of the proposed project area at which the project modifications, as described in the previously-submitted Section 106 Update Memo No. 9, are proposed for areas which have been previously disturbed by transportation infrastructure construction. 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.</p>	<p>If archaeological artifacts are uncovered during project activities, the IDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p>
<p>Additionally, it is our understanding that the portions of the proposed project area at which the project modifications described in the previously-submitted Section 106 Update Memo No. 9 are proposed-specifically, areas which have not been previously disturbed by transportation infrastructure construction-will be subjected to archaeological investigations, and that the results of these investigations will be forwarded to our office for review and comment. 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>For our comments regarding other portions of the proposed project area, please refer to our earlier correspondence.</p>	<p>The results of the additional archaeology investigation were emailed to the Indiana SHPO on April 16, 2020 for review and comment.</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 IDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p>

<p>Regarding the draft MOA, we find the stipulations consistent with what has been discussed up to this point in the consultation process and believe that the mitigation proposals are satisfactory. However, we are interested to learn the views and comments of other consulting parties as they also provide feedback on the draft MOA, which may yield further changes to or refinements of the agreement. Please note that the final MOA signatory for the Indiana SHPO will be Beth K. McCord, Deputy State Historic Preservation Officer.</p>	<p>The Draft MOA has been revised where applicable to address consulting party comments. The Indiana SHPO signatory has been revised appropriately. Thank you for the clarification.</p>
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State Historic Preservation Officer – Beth K McCord – May 4, 2020

<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 Anuradha Kumar’s (INDOT) April 16, 2020, Update Memo No. 11, which, together with the second addendum to the Phase Ia archaeological records check and field reconnaissance survey report (Schwarz, 04/15/2020), was submitted under your April 16, 2020, Review Request Submittal Form; and which we received on April 17, 2020.</p> <p>Thank you for providing the Update Memo No. 11, and the second addendum to the Phase Ia archaeological records check and field reconnaissance survey report (Schwarz, 04/15/2020), for review.</p> <p>In terms of archaeological resources, 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 as described in the second addendum to the Phase Ia archaeological records check and field reconnaissance survey report (Schwarz, 04/15/2020). We concur with the opinion of the archaeologist, as expressed in the archaeological report, that no additional archaeological investigations appear necessary at these portions of the proposed project area. For our comments regarding other portions of the proposed project area, please refer to our earlier</p>	<p>Thank you for your review and concurrence.</p>
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correspondence.	
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 the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (“IDNR-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.	If archaeological artifacts are uncovered during project activities, the IDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.
Cottage Home Neighborhood Association – Andy Beck – April 10, 2020	
I am writing on behalf of Cottage Home Neighborhood to express our support for the Rethink Coalition's response.	See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.
Lockerbie Square Peoples Club – Jeffrey D. Christoffersen – April 10, 2020	
Lockerbie Square People's Club (now Lockerbie Square Neighborhood Association) board is providing the following comments in response to the request for feedback on the DRAFT MOA and the Web Ex presentation given on March 23rd, 2020, regarding the 1-65/1-70 North Split Interchange Reconstruction Project (Des. Nos.: 1592385 & 1600808). <ol style="list-style-type: none"> 1. Regarding making the southwestern portion of the Monon Trail detour a permanent feature, the Lockerbie Square board is firmly in favor of this addition. 2. Regarding the use of earthen berms at the north end of the project, the Lockerbie Square board is also in favor of their use and look forward to providing feedback on their final design and placement. 3. Additionally, the Lockerbie Square board is aware and entirely supportive of the recommendations made by the Rethink 65/70 Coalition regarding the Draft MOA. The Lockerbie Square board fully endorses all of their comments. 	See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.
Chatham Arch Neighborhood Association – Shawn Miller – April 10, 2020	
Please accept this letter of support for the ReThink Coalition' response to 1592385 & 1600808. The Chatham Arch Neighborhood is generally in favor of the Re Think response, specifically as it relates to these 3 points: <ol style="list-style-type: none"> 1. Making the Monon Trail, Southwest segment permanent. 2. Utilizing Earthen Berms as per the Rethink suggestions. 3. Please use Terracing as per the Rethink suggestions. 	See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.

Chatham Arch Neighborhood Association – Ken Avidor – April 16, 2020	
<i>I am a newly elected board member for the Chatham Arch neighborhood. I've been asked to be the contact person for the North Split Project, so please send me any info I need to help my neighborhood stay informed and connected.</i>	<i>Per confirmation with Mr. Avidor, he was added to the North Split consulting parties list and replaced Shawn Miller.</i>
Chatham Arch Neighborhood Association – Ken Avidor – May 5, 2020	
<i>Thank you for sending me the revised MOA. I will need to consult with my neighborhood organization before agreeing to anything. That may take weeks according to the Governor's schedule.</i> <i>In these difficult times, we will all need to be more patient.</i> <i>Thank you for your understanding.</i>	<i>See response to comments submitted by Massachusetts Avenue Merchants Association on May 4, 2020, starting on page 2.</i>
Fletcher Place Neighborhood Association – Dawn Olsen – April 10, 2020	
<i>I am the President of the Fletcher Place Neighborhood Association (FPNA). I wanted to let you know today that FPNA supports the Section 106 Response of the Rethink Coalition you received from Paul Knapp this afternoon (see attached). We'll send you a more formal letter next week after we are able to communicate with a couple of our directors — the virus has interrupted almost everything around our internal meetings/communications. Thank you, and I hope you and the HNTB team are staying safe as we try to make the most of the current situation and keep things moving forward.</i>	<i>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</i>
Fletcher Place Neighborhood Association – Dawn Olsen – April 14, 2020	
<i>As a follow up to the response last Friday filed by the Fletcher Place Neighborhood Association (FPNA), I want to confirm that the nine-member FPNA Board of Directors unanimously supports the Section 106 Response of the Rethink Coalition.</i>	<i>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</i>
Old Northside Neighborhood Association – Megan Robinson – April 10, 2020	
<i>The Old Northside Neighborhood Association (ONSNA) Board of Directors generally supports the comments provided by the ReThink Coalition with regards to the email on March 11, 2020 and WebEx presentation on March 23, 2020 at a Consulting Parties Meeting. They accurately reflect many of the comments discussed within our neighborhood.</i>	<i>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</i>
<i>Furthermore, we believe tree preservation is critical in the Old Northside. The ONS has an urban forest along its portion of the North Split, which greatly enhances the neighborhood quality of life. It is crucial that as many trees as possible be preserved and those that ultimately do not survive are replaced at a minimum rate of 3 to 1 with the appropriate maintenance to ensure their survival. Not only will the preservation of trees be favorable in the long term, but will also be beneficial to the neighborhood during the construction phase by providing a natural barrier to some of the dust, debris, and other nuisance</i>	<i>Trees outside of a 15-foot construction area will be preserved in a Do Not Disturb area along the side slope north of I-65, adjacent to the Old Northside Historic District. If trees do not survive within this area, they will be replaced at a 3:1 ratio.</i>

generally associated with road construction	
The ONSNA Board would also like to see additional penalties associated with the destruction of trees in the “Do Not Disturb” zone as another measure to deter the damage and removal of the trees in those areas. In keeping with the ONSNA desire for tree preservation, terracing is not appropriate in the ONS as it requires increased tree removal.	The design-build team will be in violation of their contract with INDOT if trees are removed within the Do Not Disturb area. The areas will be delineated and the requirement to protect these trees will be reinforced by INDOT personnel on site. Thank you for your input regarding the preference of tree preservation over terraces.
An additional point of emphasis is the addition of sidewalk to the south side of 12th street between Alabama Street and Central Avenue. This is the only area along the interstate that does not currently have any sidewalk. The addition in this area would serve as a connector between the two underpasses providing added safety to pedestrians.	Sidewalks or trails within INDOT’s limited access right-of-way will not be provided at this location. I-65 is not parallel with 12 th Street on this segment, resulting in the narrowing of the right-of-way from east to west, leaving minimal space at Alabama Street. Placing a sidewalk immediately adjacent to 12 th Street within the City right-of-way, similar to the condition east of Central on the south side of 12 th Street, would require tree removal and possibly impact limestone curbs within the Old Northside Historic District. The sidewalk on the north side of 12th Street between Alabama Street and Central Avenue will be undisturbed by the project and will continue to be available for neighborhood use.
Finally, the ONSNA Board requests additional detail on the design of the underpasses. The current overview and descriptions do not provide enough detail to depict the final result. As outlined in the ReThink Coalition’s comments, the ONS has made significant investment in the Central Avenue underpass area with custom art by Dale Enoch. It is paramount this installation is preserved and incorporated into the design as well as considered in the design of the other underpasses within the ONS.	Design information for the underpasses is not yet available. The sculptures and plantings at the intersection of Central and 12 th are within the designated Do Not Disturb area for the project.
St. Joseph Historic Neighborhood Association – Mark Godley – April 10, 2020	
On behalf of St. Joseph’s Historic Neighborhood Association we appreciate the continuing opportunity to provide input, especially since the Section 106 review found that our historic neighborhood will be adversely affected by the I-65/I-70 rebuild project. Through our membership in Historic Urban Neighborhoods of Indianapolis (HUNI) we have provided input, review, and comment to the Rethink I65/70 Coalition response. With this letter we enthusiastically support the detailed and comprehensive written review submitted by the Rethink 65/70 Coalition for the above described matter. We also affirmatively support the Rethink Coalition recommendations for: (a) making permanent the detoured southwest segment of the Monon Trail; (b) proposed earthen berms; and (c) terracing.	See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.
St. Joseph Historic Neighborhood Association is pleased to see that page 9 Item 3a of the DRAFT MOU includes several connectivity improvements for the Alabama St. bridge but believe that more should be done not only to improve connectivity but safety in the built environment.	Unlike other locations in the North Split project, Alabama Street is not crossed by a stand-alone bridge. Instead, it is the eastern end of a very large bridge extending more than a half-mile west past Capital Avenue. Newly designing or replacing this bridge would need to occur in a future project.

<p>Improvements to the Alabama St. underpass should not only create better lighting and aesthetics but include design work that prevents homeless) and discourages litter accumulation encampments (current and ongoing concerns for both St Joseph and Old Northside Neighborhoods).</p>	<p>Meanwhile, connectivity improvements are included in the North Split project at Alabama Street to provide a level of continuity in lighting and aesthetics for the neighborhood.</p> <p>Regarding the use of the bridge by people experiencing homelessness, INDOT has developed a partnership for service-based professional outreach to homeless encampments in INDOT right-of-way in Indianapolis, and this will be INDOT’s approach to encampments within the North Split Project right-of-way as well.</p>
<p>Holy Cross Neighborhood Association – Kelly Wensing – April 10, 2020</p>	
<p>The Holy Cross Neighborhood Association (HCNA) submits this correspondence in response to the North Split Consulting Parties Meeting #8 presented via webex on March 23, 2020. Thank you for the opportunity to review the Section 106 Draft MOA dated March 9, 2020 and the Updated Memo #10 from March 11, 2020.</p> <p>Holy Cross Neighborhood Association would like to go on record that we support the comments dated April 10, 2020 that were submitted by the Rethink 65/70 Coalition in response to the March 11, 2020 email, the webex presentation given by INDOT/HNTP on March 23,2020 and the Draft MOA dated March 9, 2020.</p>	<p>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</p>
<p>In addition, we would like to include the following comments:</p> <p>Page 7: Item 2g – Neighborhood Meetings Please add Holy Cross Neighborhood Association to this item. The split interchange including six of the replacement bridges fall within the Holy Cross Neighborhood Association boundaries. Those replacement bridges are (north to south) Michigan Street, Vermont Street, New York Street, Ohio Street, Market Street, and Washington Street. We currently maintain the slopes related to the highway from Michigan to Washington. For this reason, we believe we should be included on the draft landscape and side slope plan.</p>	<p>The neighborhood meetings mentioned in the MOA target the historic districts that will be adversely affected by the project under Section 106. However, all community members will be welcome at these meetings.</p> <p>All consulting parties will be sent the draft landscape and side slope plan for review, not just those adversely affected under Section 106.</p> <p>A commitment will be included in the Environmental Assessment to hold one round of four neighborhood meetings during the design process to show the results of the project design and CSS design elements. Holy Cross will be invited to these meetings.</p>
<p>Page 7: Mitigation Measures/Tree Preservation We request that any trees within our boundaries that impacted by the project (not just those within “Do Not Disturb” areas) be replaced per II. Mitigation Measures/A. Tree Preservation and Plantings at a ratio of 3 to 1 with 2-inch dbh.</p>	<p>Although not specifically called out at a 3:1 ratio, the plantings specified in the Aesthetic Design Guidelines outside of the Do Not Disturb areas will likely end up replacing trees impacted at this ratio or greater. All trees planted will be 2-inch dbh or greater.</p>
<p>Page 9: B. Connectivity Improvements We would like to have Holy Cross Neighborhood signage identifying our neighborhood at each bridge that falls within our boundaries.</p> <p>We are operating with the understanding that pedestrian experiences will be improved as stated for each gateway under bridges within our boundaries with specific</p>	<p>Because Holy Cross Historic District will not be adversely affected by the project under Section 106, mitigation measures for Holy Cross Historic District will not be called out in the MOA.</p> <p>Underpasses throughout the project area will be designed in accordance with the Aesthetic Design Guidelines. The text on the bridges represents a graphic illustration. The final</p>

<p>attention to Vermont Street as it is the safest pedestrian corridor.</p> <p>Holy Cross Neighborhood Association (HCNA) is directly impacted by the interstate on a daily basis and we appreciate the opportunity to provide feedback on the I-65/I-70 North Split Interchange Reconstruction Project.</p>	<p>decision regarding graphics shall be made during final design. This comment will be shared with the landscape architect developing final design as part of the design-build team.</p>
<p>Historic Urban Neighborhoods of Indianapolis – Marjorie Kienle – April 10, 2020</p>	
<p>Historic Urban Neighborhoods of Indianapolis (HUNI) appreciates your providing the update and the draft memorandum of agreement (MOA) for review. We would like to acknowledge the effort all of you have put into the refinements to reflect neighborhood input in to this project. We appreciate being heard regarding such aspects as maintaining the Monon Trail detour as a permanent feature and providing Michigan, New York and Washington with major bridges. With small differences, our neighborhoods share similar desires and concerns about this project. By-in-large the neighborhood perspectives are reflected in the responses that you have received from the Rethink Coalition throughout this process and this time is no different. HUNI has reviewed the response from the Rethink Coalition’s technical team and agree that it is consistent with our recommendations, particular with input on the current version of the North Split Aesthetic Design Guidelines.</p>	<p>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</p>
<p>Historic Urban Neighborhoods of Indianapolis – Marjorie Kienle – March 24, 2020</p>	
<p><i>My computer was down and our computer guy could not get on remotely until last evening. Therefore, I was unable to participate in the meeting. I need to express a concern. You listened to my concern about the New York Street and Washington Street bridges and changed them but not in the Section 106 document. We all know that if it is in Section 106 it will happen but if not, it will be a “nice to have” and could be value engineered out. How can we add New York and Washington to the others that are listed in the Section 106 document? The New York Street bridge is an important part of Lockerbie Square and is definitely a mitigation strategy.</i></p>	<p><i>We understand from a community perspective why those underpass locations are important which is why they are called out as major gateways in the Aesthetic Design Guidelines. However, the Section 106 MOA includes mitigation specifically for adverse effects to historic properties. The Lockerbie Square Historic District and the Holy Cross Historic District did not have adverse effects as part of the project under Section 106, therefore this measure will not be included in the Section 106 MOA.</i></p> <p><i>Major gateway treatments are included at New York and Washington in the Aesthetic Design Guidelines. The MOA requires INDOT, and their design-build team, to follow the Aesthetic Design Guidelines in project development. We do not anticipate these treatments being removed from the project.</i></p>
<p>Martindale Brightwood Community Development Corporation – Amina Pierson – April 14, 2020</p>	
<p>Please accept this letter of support for the Rethink 65/70 Coalitions' response to the Section 106 Draft MOA dated March 9, 2020 and the Update Memo #10 dated March 11, 2020.</p> <p>We concur with the Rethink 65 /70 Coalition letter dated April 10, 2020 and their comments on the Aesthetic Guidelines, and attach it to our response, especially as it relates to:</p>	<p>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</p>

<p>1. Walkability/Mobility: Providing a sidewalk between Commerce Avenue and the Monon Trail on the north side of I-70.</p> <p>2. Safety/Structure Stability: Treating the Commerce/Roosevelt Avenue underpass as a major connector linking Hillside and Windsor Park neighborhoods through I-70, including structure upgrades, painting, lighting, landscaping and safe sidewalks.</p> <p>3. Beautification/Environmental Justice: Planting along the sound walls should be dense with evergreen trees - combatting emissions pollution.</p>	
<p>National Trust for Historic Preservation – Elizabeth Merritt – April 10, 2020</p>	
<p>Attached in identical Word and PDF format are comments from the National Trust on the Draft MOA.</p> <p>In addition, we support all of the comments submitted by the Rethink 65/70 Coalition, as well as the comments from the ACHP and SHPO.</p>	<p>Thank you for providing these comments.</p> <p>See response to comments submitted by the Rethink 65/70 Coalition on April 10, 2020, starting on page 15.</p>
<p>[Draft MOA page 2, Regarding: Benjamin Harrison Home/Presidential Site and James Whitcomb Riley House]</p> <p>It might be a good idea to list these 2 separately as NHLs.</p>	<p>The MOA has been revised to include a separate Whereas clause for the National Historic Landmarks.</p>
<p>[Draft MOA page 3, Regarding: WHEREAS the FHWA, in consultation with the Indiana SHPO, has determined, pursuant to 36 C.F.R. Section 800.4(c), that the properties listed below are eligible for inclusion in the National Register of Historic Places (“NRHP”):]</p> <p>Whereas Clauses 6 and 7 could be deleted because they are completely encompassed by Whereas Clause 5 above. There is no need to distinguish between NR-listed and NR-eligible properties.</p>	<p>Whereas Clauses 6 and 7 have been deleted.</p>
<p>[Draft MOA page 5, Regarding: WHEREAS the FHWA, in consultation with the Indiana SHPO, has invited the Indiana Department of Transportation (“INDOT”) to participate in the consultation and to become a signatory to this Memorandum of Agreement (“MOA”); and]</p> <p>This seems totally unnecessary, since INDOT will be the agency managing the construction contract, so they’re a lot more than just a courtesy signatory.</p> <p>[Draft MOA page 6]</p> <p>You can figure out where to put this, but it needs to be included.</p> <p>X. DESIGN-BUILD CONTRACTOR</p> <p>INDOT shall ensure that the requirements of this MOA are incorporated into the contract with its Design-Build Contractor(s).</p>	<p>This clause was not removed to maintain consistency with other invited signatory clauses for the Benjamin Harrison Presidential Site and Keep Indianapolis Beautiful.</p> <p>The clauses about the design-build contractor were not included because, like all contracting mechanisms utilized by INDOT, the design-build contract will obligate the contractor to satisfy project commitments specified by INDOT, including applicable MOA stipulations.</p> <p>INDOT has a commitments spreadsheet where all project commitments are included and provided to the contractor for incorporation into the project.</p> <p>In addition, a monitoring stipulation has been added in order to keep consulting parties up to date on MOA compliance.</p>

<p>[Draft MOA page 7, Regarding: a. Consulting parties are identified in Attachment B of the Draft MOA.]</p> <p>This seems unnecessary since it's already defined in the whereas clauses.</p>	<p>This has been removed.</p>
<p>[Draft MOA page 10, Regarding: Developing and implementing a vibration monitoring program for construction activities.]</p> <p>Add the following language: "Ensuring that, whenever vibration levels reach the applicable levels identified in Stipulation II.C.2., construction work will immediately stop until such time as the qualified professionals have determined that modifications have been made in the construction activities to assure that no damage shall occur to historic properties;"</p> <p>This paragraph needs to be renumbered as (c), (and the rest need to be renumbered as well), but I can't figure out how to fix it.</p>	<p>This language has been added and the paragraph renumbered appropriately.</p>
<p>[Draft MOA page 11, Regarding: Table 1. Construction Vibration Thresholds (PPV)]</p> <p>Add a category for all other buildings, with a PPV limit of 0.50 in/sec.</p>	<p>This has been added to the table for non-historic older residential structures as well as a category for new residential structures with a vibration threshold of 1.0 in/sec.</p>
<p>[Draft MOA page 12]</p> <p>[A Stipulation needs to be added to provide a mechanism for monitoring and minimizing noise levels. In addition, we recommend the provision of noise reduction technology installations for the historic buildings closest to the Project.]</p>	<p>Because this project is within a densely populated, urban area the design-build team is required to prepare a Construction Noise Abatement Plan. The Construction Noise Abatement Plan shall be submitted to INDOT for review and approval prior to construction. It shall be submitted to consulting parties for their information once it has been approved.</p> <p>This is not included in the MOA because construction noise will be temporary and was not identified as an adverse effect as part of Section 106.</p>
<p>[Draft MOA page 15, Regarding: Stipulation IV.A.1]</p> <p>You need to add a separate provision that establishes a dispute resolution process for the consulting parties who are not signatories. You don't want to leave them in a position where they have to take any dispute directly to court – give yourself the opportunity to resolve it first.</p>	<p>Concurring parties have been added to the original stipulation.</p>
<p>[Draft MOA page 16, Regarding: Stipulation IV.C.1]</p> <p>How is this going to be determined and how will the consulting parties know which actions have been delegated in this regard?</p>	<p>This language has been removed.</p>
<p>[Draft MOA page 17]</p> <p>Monitoring of Compliance and Annual Reporting</p> <p>[Add a provision spelling out a requirement to submit an annual report on the status of fulfilling the Stipulations</p>	<p>Stipulation IV.A Monitoring of Compliance was added to the MOA.</p>

and convene an annual meeting of all consulting parties to evaluate how compliance with the MOA is going.]	
[Draft MOA page 18, Regarding Stipulation IV.E. Duration] We routinely object to this null and void language, because if taken literally, it would mean that the parties could flagrantly violate the requirements of the MOA, and the requirements would magically evaporate at the end of 2030.	This has been revised per the language provided.
Windsor Park Neighborhood Association – Jen Eamon – May 5, 2020	
<i>Like MAMA, many neighborhood associations will likely need to review the revisions prior to signing a MOA.</i> <i>Our internal processes in Windsor Park require meeting, discussion and votes.</i> <i>Just a head's up that we are likely well more than a week out before we would be able to sign anything.</i>	<i>See response to comments submitted by Massachusetts Avenue Merchants Association on May 4, 2020, starting on page 2.</i>
Indianapolis Historic Preservation Commission – Meg Purnsley – May 5, 2020	
<i>I agree with MAMA and Windsor Park. Could you send us a link to view the guidelines?</i>	<i>See response to comments submitted by Massachusetts Avenue Merchants Association on May 4, 2020, starting on page 2.</i>
Rethink 65/70 Coalition – Paul Knapp – April 10, 2020	
The following comments are provided by the Rethink 65/70 Coalition in response to an email on March 11, 2020 and a webex presentation given by INDOT/ HNTB on March 23, 2020 at a Consulting Parties Meeting: Primary Comments: The following comments apply to the Section 106 Draft MOA dated March 9, 2020 and the Update Memo #10 dated March 11, 2020. We have listed the page and item number, and then our comment. Page 7: Item 2g - Neighborhood Meetings Comment: We recommend the addition of a meeting for the four Martindale-Brightwood area neighborhoods that is open to the public.	The neighborhood meetings specified in the MOA target the historic districts that will be adversely affected by the project under Section 106. However, all community members will be welcome at these meetings. A commitment will be included in the Environmental Assessment to hold one round of four neighborhood meetings during the design process to show the results of the project design and CSS design elements. Martindale-Brightwood residents will be invited to these meetings.
Page 7 – Item 4 Engage <i>Keep Indianapolis Beautiful</i> as landscape advisor for services, planting, monitoring and maintenance. Comment: While the Rethink Coalition acknowledges the important work KIB contributes to the greening of the Indianapolis urban environment, the proposed Landscape Advisor role is a new proposal by INDOT. As we have thought and debated this new proposal, we	The design-build team will be responsible for the landscape design and installation. The design-build team is required to include a qualified, registered landscape architect in responsible charge of this work. KIB is a non-profit local agency being engaged in an advisory and possibly maintenance role because they have experience with tree and shrub plantings in transportation right-of-way in this urban area.

<p>think the entity that is selected to fill this critical role during construction and for three years during the following maintenance period should be determined objectively and with a great deal of consideration. Therefore, we recommend INDOT select the most qualified landscape management firm with proven expertise in the development of restoration planning, planting and management and that has a comprehensive understanding of the urban landscape. KIB should certainly be invited to submit their credentials and approach to the work, along with others.</p> <p>The Rethink Coalition recommends this critical entity be selected based on qualifications that meet the following criteria. Selection should be based on demonstration of the following:</p> <ol style="list-style-type: none"> 1. expertise in natural resource management 2. expertise in natural system restoration and revegetation 3. expertise in native landscape establishment in urban areas and appropriate species selection 4. expertise in native landscape maintenance expertise and track record of project establishment and sustainability 5. engagement with adjacent stakeholders and utilization of local labor forces where possible 6. capacity and demonstrated ability to perform the work 	
<p>Page 7 – Item 5 – Replacement Comment: Rethink requests that this clause be modified to state that plantings should be evaluated annually and replaced as soon as possible. If the plant dies again, it should be replaced with an approved substitute species.</p>	<p>This commitment has been revised to say:</p> <p>INDOT shall replace trees and shrubs that do not survive during the first three years after planting. INDOT shall monitor planted trees and shrubs annually for three years. If dead trees or shrubs are identified during each annual monitoring, they will be replaced. If the replaced plant dies again, it shall be replaced with a substitute species approved by INDOT.</p>
<p>Page 8- Item 7 – Replacement of trees within the “Do Not Disturb” areas Comment: If trees in the “Do Not Disturb” areas die due to construction impacts and if space and conditions do not allow for the replacement tree in the same general area, then Rethink recommends that the three replacement trees INDOT proposes to plant for every one that dies should be planted along city streets in the impacted historic districts or the interstate side slopes of other areas impacted by interstate reconstruction.</p>	<p>All replacement trees must be replanted within the INDOT right-of way. The MOA stipulation has been revised to state:</p> <p>“...The replacement trees shall be planted in the “Do Not Disturb” areas if space allows or within INDOT right-of-way within the project area.”</p>
<p>Page 9 – Item B Connectivity Improvements General comments:</p> <ol style="list-style-type: none"> 1. The list of connectivity improvements should include St. Clair, Michigan, New York, Vermont, Washington and East 10th Street. 2. Each neighborhood has an established logo and sign standards. The MOA should reference coordinating with 	<p>We understand from a community perspective why those underpass locations are important which is why they are called out as major gateways in the Aesthetic Design Guidelines. However, the Section 106 MOA includes mitigation specifically for adverse effects to historic properties: Old Northside Historic District/Morris Butler House, Chatham-Arch Historic District, and the Saint Joseph</p>

<p>the neighborhoods to use their individual identity systems.</p>	<p>Neighborhood Historic District. The streets listed are not adjacent to historic properties that will have adverse effects as a result of the project under Section 106, therefore this measure will not be specified in the Section 106 MOA.</p> <p>Gateway treatments are included at these streets in the Aesthetic Design Guidelines. The MOA requires INDOT, and their design-build team, to follow the Aesthetic Design Guidelines in project development. We do not anticipate these treatments being removed from the project.</p> <p>The following language has been added to the MOA under Stipulation 3.B.a. regarding the Alabama Street underpass:</p> <p>“...Coordination will occur with the Old Northside and Saint Joseph Neighborhoods regarding their established logos and sign standards.”</p>
<p>Page 9 – Item B 3a – Alabama Street Comments: The Rethink Coalition is not clear whether the Alabama Street underpass improvements described in the MOA will include underpass cleaning of accumulated mud and dirt and if the interstate drainage will be redirected out of the underpass area?</p>	<p>Because the bridge over Alabama Street is not being replaced, the drainage at the underpass will not change.</p>
<p>Page 9 – Item B 3b – Central Avenue Comment: The Old Northside erected gateway features consisting of limestone columns and planting pockets on the north side of the Central Avenue underpass. The artist was Dale Enochs. These features should remain, be repaired or replaced if damaged by construction activities, and incorporated into the design of the pedestrian sidewalk area. This gateway project was funded through the LPA with federal TE funds matched by neighborhood donations.</p>	<p>The sculptures and plantings at the intersection of Central Avenue and 12th Street are within the designated Do Not Disturb area for the project.</p>
<p>Page 9 – Item B 5 – Monon Trail detour. Comment: The presentation on March 23, 2020 indicated that the southwestern portion of the detour is under consideration to be a permanent feature. The Rethink Coalition strongly supports the whole detour be permanent to improve connectivity between the historic neighborhoods. (March 23 slide attached).</p>	<p>Thank you for your feedback. Further coordination with the City of Indianapolis is required for this action, but the following commitment has been added into the MOA:</p> <p>INDOT shall construct a temporary detour for the Monon Trail during construction. INDOT shall work with the City of Indianapolis to determine if the portion of the detour southwest of the interchange from College Avenue southeast to 10th Street can remain as a permanent feature to improve connectivity for the Chatham-Arch Historic District. Retaining this trail as a permanent feature is conditional upon INDOT reaching an agreement with the City of Indianapolis. The final decision shall be communicated to consulting parties.</p>
<p>Additional comments on Connectivity: 1. The slide for the Minor Bridges, page 15, states “planting and lighting buffer zones only required at St. Clair Street Crossing”. This implies there is no sidewalk at the St. Clair underpass. If this is a correct understanding of</p>	<p>The “planting and lighting buffering zones” note for St. Clair Street Crossing is highlighting the unique instance where space is available for a planting and buffering zone in addition to sidewalks. Sidewalks are still included on St. Clair Street.</p>

<p>that language, Rethink believes the MOA should include a commitment to install a buffered sidewalk for the St. Clair underpass. St. Clair Street is one of the few streets that connects the east side to downtown and west to the Canal. Currently there are 16-18 ft. wide existing sidewalks on both sides of St. Clair below the underpass.</p>	
<p>The existing East 10th Street underpass has enhancements put in place for the Superbowl in 2010 such as identity signage elements on both east and west approaches, black coatings on the underside of the bridges, red painted bridge columns, hanging lanterns from the bridge infrastructure, native massed plantings on the side slopes between the structures, wide pedestrian ways (10') to accommodate both bike and pedestrian usage with bollards along the curb, murals on the bridge side slopes and a generous (20'-wide), planted landscape median between the structures and bridge approaches. The MOA should include a commitment that these elements be maintained or replicated for the new underpass area.</p>	<p>We understand the 10th Street underpass has enhancements that are important to the community. The dimensions of pedestrian ways, the local surface streets, and the medians will be the same as existing when construction is complete.</p> <p>Although the Massachusetts Avenue Commercial Historic District is near the 10th Street overpass, this historic district will not have an adverse effect as a result of the North Split Project under Section 106. For that reason, it will not be included as a stipulation in the Section 106 MOA.</p> <p>The following commitment will be included in the Environmental Assessment for the project:</p> <p>The public art sculptures, lanterns, and signs that are currently located along the Payne Connection shall be removed and stored during construction. The public art sculptures, lanterns, and signs shall be reinstalled once the interstate bridges have been constructed. Coordination with the Near East Area Renewal (NEAR) shall occur prior to re-installation of these features to determine their locations within the Payne Connection.</p>
<p>Page 18 – Invited Signatories Rethink requests that the City of Indianapolis (Mayor's Office) be an invited signatory.</p>	<p>Invited signatories are those with a role or responsibility as dictated by the MOA. Because they do not have a direct responsibility as a result of the MOA, the Mayor's Office is not included as an Invited Signatory. The City will be provided the MOA to sign as a Concurring Party if they wish to do so.</p>
<p>Page 18 – (Optional) Concurring parties: Rethink requests the Rethink 65/70 Coalition be listed as an optional Concurring Party.</p>	<p>The Rethink 65/70 Coalition has been added to the MOA as an optional Concurring Party.</p>
<p>Comments on the Section 106 Update Memo #10 dated March 11, 2020 Page 2 – Additional Mitigation Items. Comment: Many of these items are addressed in this letter and the Rethink comments apply to this section of the Update memo.</p>	<p>Comment noted.</p>
<p>Page 4 – Additional Input Requested Regarding Retention of Earthen Berms Comment: Generally, the Rethink Coalition supports the proposed earthen berms, subject to the comments on the diagrams and sufficient review during the design process.</p>	<p>The final grading plan and planting plan is to be provided by design-build team for INDOT approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p> <p>The following stipulations have been included in the MOA:</p> <p>Berms shall be included in the interchange design to provide visual shielding and noise reduction from the interchange ramps for the Old Northside and Chatham-Arch Historic</p>

	<p>Districts.</p> <ol style="list-style-type: none"> a. The berms shall be located in the northwest quadrant of the interchange, extending from approximately 14th Street to College Avenue, and in the southwest quadrant of the interchange, extending from College Avenue to 10th Street. b. The berms shall be sculpted into a softer, more natural shape and planted with trees such that they do not appear as abandoned “roadbeds”. The proposed shape of the berms shall be included in the draft landscape and side slope plan provided to consulting parties for comment. c. All other remnants of previous “roadbed” use shall be removed from areas that will no longer serve such a use, including those adjacent to the O’Bannon Soccer Park.
<p>Page 8 – Planting Terraces Comment: Please see mark ups on the Aesthetic Guidelines. The Rethink Coalition believes the cost estimate for one level of terrace at each of the underpass approaches will not be as extravagant as projected in the Update Memo (which was based on three terraces). The terrace concept directly addresses the bridge end conditions where large expanses of MSE walls are exposed. The terrace concept should not be used extensively, and the Rethink Coalition looks forward to the technical cross sections that will be provided during the design process to evaluate the terrace concept in more detail.</p>	<p>The Aesthetic Design Guidelines were developed considering the three predominant feedback elements received throughout the CSS public comment periods - minimize the use of walls, preserve existing trees, and maximize bridge openings.</p> <p>The example concept provided would impact the first and second items, and also create more visual impact by raising roadway profiles. The tiered or terraced wall approach would change the overhead bridge design by requiring longer bridge spans, deeper superstructures (to eliminate multi-spans and piers), and taller walls. More significantly, this approach would require higher bridge and roadway profile elevations throughout the project area. This would result in both increased visual impacts, and significantly higher construction cost and long-term life-cycle cost.</p> <p>To accommodate these higher profile grades, bridge abutment walls would be taller near the bridge openings, while the retaining walls along the side slopes could be shorter (in locations where retaining walls are necessary).</p> <p>This comment will be shared with the landscape architects and engineers developing the final design to determine the feasibility of incorporating elements that could minimize the visual impact of the wall height.</p>
<p>Comments on the Aesthetic Guidelines Please see attached comments on individual pages of the Aesthetic Guidelines dated February 25, 2020 and supplemented in the Update Memo #10 dated March 11, 2020. Rethink requests a review copy before the final MOA is issued for signature.</p>	<p>Thank you for your input and participation in the CSS process for the project. The Aesthetic Design Guidelines have been given to the design-build teams for inclusion in their proposal submittals.</p> <p>The Aesthetic Design Guidelines will not be formally updated at this time; however, your feedback will be passed on to the selected design-build team.</p>
<p>Mitigation Effort That Should be included in the MOA 1. Interstate lighting: lighting along the interstate travelways should minimize light trespass into the night</p>	<p>Lighting levels are intended to provide safe and functional illumination for designated vehicular and pedestrian areas. Lighting will generally be replaced in a manner similar to the</p>

<p>sky and adjacent neighborhoods. Do not use tall mast lighting.</p>	<p>existing condition, with high mast lighting in the interchange area, and along the east and south legs of the interchange. Conventional lighting will be utilized along the west leg, similar to the existing condition.</p> <p>From a maintenance perspective the high mast lighting is easier/safer to access and would not require closing a lane or shoulder for work. Areas where the pavement is wider, such as the area between 10th Street and Washington Street, would require conventional lights on the concrete barrier to light the middle lanes which is more difficult to access and maintain.</p> <p>The design-build team has been directed to limit light trespass outside of INDOT's right-of-way. Light trespass outside of the right-of-way shall be limited by shields, lighting distribution selection, or other means.</p>
<p>Aesthetic Design Guidelines Attachment: Page 1 Underpass Rendering</p> <p>RETHINK RECOMMENDS PUTTING “DOWNTOWN PORTAL” OR “LOCKERBIE SQUARE NEIGHBORHOOD” ON BRIDGES BASED ON LOCATION AND DIRECTION OF TRAVEL. (THE ILLUSTRATION IMPLIES THE BRIDGE WOULD BE NAMED “INTERSTATE 65/70” SINCE THAT IS WHAT IT IS CARRYING.)</p>	<p>The text on the bridges represents a graphic illustration. The original intent was to include the local street name, not the interstate name. Final decisions regarding graphics shall be made during final design. This comment will be shared with the landscape architect developing final design as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 1 Underpass Rendering</p> <p>TRANSITION MSE WALL AT BRIDGE APPROACHES WITH TERRACE TO MATCH UNDERPASS CORNER TREATMENT. THIS MSE WALL EXPANSE IS TOO TALL. SEE SKETCH NEXT PAGE.</p>	<p>Please see comment on page 19 about planting terraces.</p>
<p>Aesthetic Design Guidelines Attachment: Page 1 Underpass Rendering</p> <p>DIAGRAM IS CONFUSING. IS THE BUFFER INTENDED FOR BIKE TRAVEL?</p>	<p>The graphic was intended to highlight different paving material under the bridge – this highlights the extra width of the bridge openings. It is not intended to be a designated bicycle travel lane, and the bicyclist should not have been shown. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 1 Underpass Rendering</p> <p>WOULD PREFER TREE LAWN AND STREET TREES BETWEEN CURB AND SIDEWALK INSTEAD OF PAVING WHEN NOT UNDER BRIDGES</p>	<p>Since the graphic is prototypical, there are many different conditions/scenarios where the new construction meets the current existing conditions. The final treatment for how these connections are made will be determined pending final design from design-build team. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 1 Underpass Rendering</p> <p>COMMENT: MINIMIZE IMPACT OF TALL BRIDGE WALL EXPANSE WITH TERRACE</p>	<p>Please see comment on page 19 about planting terraces.</p>

<p>STEPPED TO MATCH BRIDGE CORNER TREATMENT TO CREATE PEDESTRIAN SCALE ALONG SIDEWALK AT BRIDGE APPROACHES. SEE SKETCH NEXT PAGE.</p>	
<p>Aesthetic Design Guidelines Attachment: Page 1 Underpass Rendering</p> <p>COMMENT: TURF ADJACENT TO PEDESTRIAN SIDEWALK ON GRADE IS PREFERRED TO FORMAL PLANTINGS. NATURALIZE TERRACE AND SLOPE PLANTING AREAS.</p>	<p>Since the graphic is prototypical, there are many different conditions/scenarios where the new construction meets the current existing conditions. The final treatment for how these connections are made will be determined pending final design from the design-build team. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 2 Underpass Example</p> <p>SHORTER WALL TRANSITIONS TO A SLOPED BANK MINIMIZING EXPANSE AND SCALE AT BRIDGE APPROACH.</p>	<p>Please see comment on page 19 about planting terraces.</p>
<p>Aesthetic Design Guidelines Attachment: Page 2 Underpass Example</p> <p>OPTIONAL CONSIDERATION: GATHERING SPACE MAY BE APPROPRIATE AT SOME LOCATIONS</p>	<p>Sketch provided is noted. If desired, future gathering space could occur outside the INDOT right-of-way.</p>
<p>Aesthetic Design Guidelines Attachment: Page 2 Underpass Example</p> <p>EXAMPLE DESIGN GUIDELINE FROM CHARLOTTE, NORTH CAROLINA. THIS WALL TRANSITION SHOULD BE INCORPORATED INTO BRIDGE GUIDELINES FOR THE NORTH SPLIT.</p>	<p>Please see comment on page 19 about planting terraces.</p>
<p>Aesthetic Design Guidelines Attachment: Page 3 Color</p> <p>PLEASE CLARIFY IF THE CONCRETE COLORS ARE INTEGRAL OR PAINTED. PREFER INTEGRAL BECAUSE OF POTENTIAL FOR PEELING PAINT OVER TIME.</p> <p>RETHINK WOULD PREFER TO USE THE COLORS IN CONCRETE (A) FOR ELEMENTS IN CONCRETE (B) SO ALL ELEMENTS ARE ONE "FAMILY"</p>	<p>Color range was created in response to public input throughout the CSS process. The final color, hue, and application will be submitted by the design-build team to INDOT for approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team</p>
<p>Aesthetic Design Guidelines Attachment: Page 4 Major Gateway Surfacing Schematic Details</p> <p>CONSIDER BOLLARD LIGHTING AT CURB BAND IF SHARED USE PATH [BIKE & PED] COMBINED USAGE LIKELY [10TH ST., ETC]</p>	<p>Bollard lighting is not part of the design recommendations due to maintenance concerns.</p>
<p>Aesthetic Design Guidelines Attachment: Page 4 Major Gateway Surfacing Schematic Details</p> <p>VERIFY THAT EXPOSED CONCRETE PAVING IS</p>	<p>Exposed concrete walks at underpasses are standard thicknesses and are not intended for vehicular traffic loads. Since these walks are adjacent to streets, heavy vehicles should not be driving on them.</p>

<p>HEAVY DUTY (8" THICK) SINCE MAINTENANCE VEHICLES WILL DRIVE ON THE WALKWAY</p>	
<p>Aesthetic Design Guidelines Attachment: Page 5 Lighting</p> <p>RECOMMEND LIGHTING BE UPGRADED AT COMMERCE & ALABAMA UNDERPASSES. EXISTING LIGHTING IS DEFICIENT.</p>	<p>Pedestrian level lighting will be replaced at the Alabama Street and Commerce Street bridges.</p>
<p>Aesthetic Design Guidelines Attachment: Page 6 Down Lighting</p> <p>IF THE WIDE WALK IS POTENTIALLY A SHARED USE PATH, SUCH AS AT 10TH STREET, BOLLARD LIGHTS NEAR THE CURB LINE IS DESIRABLE.</p>	<p>Bollard lighting is not part of the design recommendations due to maintenance concerns.</p>
<p>Aesthetic Design Guidelines Attachment: Page 6 Down Lighting</p> <p>THESE WALL-PACK FIXTURES APPEAR TO BE PRIMARILY FOR ROADWAY LIGHTING & WILL PRODUCE HIGH BRIGHTNESS/GLARE IN THE PEDESTRIAN ZONE, AND CANCEL OUT THE MORE SUBTLE WALL WASH. WE RECOMMEND THE FOLLOWING PERFORMANCE CRITERIA RATHER THAN FIXTURE RECOMMENDATIONS. MOUNT OR SUSPEND ROADWAY FIXTURES OVERHEAD NEARER THE CURB LINE & ORIENTED TOWARDS THE ROAD CENTER. WALL-WASH FIXTURES SHOULD BE MOUNTED & CALIBRATED/SIZED FOR WALL-WASH & REFLECTIVE LIGHTING OF THE PEDESTRIAN ZONE PER MANUF. RECOMMENDATIONS. ACHIEVE MINIMUM 0.5 FOOT CANDLE FOR PEDESTRIAN WALKWAY.</p> <p>PROVIDE PROGRAMMABLE, DYNAMIC LED SYSTEM THAT IS RESPONSIVE TO TIME-OF-DAY VARIATIONS IN LIGHTING AND ADDRESS VARIABLE UNDERPASS LENGTHS.</p> <p>SUCH SYSTEM SHALL BE EXPANDABLE FOR FUTURE ENHANCEMENTS FOR MORE EXPERIENTIAL ART-BASED GATEWAYS.</p>	<p>The design-build team will provide final lighting selection during final design for review and approval by INDOT. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 7 Up Lighting</p> <p>SHOW SCHEMATIC DETAIL OF MOUNTING ON MONUMENT DETAIL SHEET</p>	<p>The design-build team will provide lighting selection, including mounting options, during final design for review and approval by INDOT. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 7 Up Lighting</p>	<p>We agree with the statement. This just allowed for the potential use of ground mounted lighting. The design-build team will provide lighting selection during final design for</p>

<p>GROUND MOUNTED NOT DESIRABLE UNLESS FULLY ARMORED & ENCLOSED.</p>	<p>review and approval by INDOT. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 8 Fencing</p> <p>FENCING SHOULD BE MINIMIZED. TERRACING WILL ELIMINATE THE NEED FOR FENCING AT THE BRIDGE APPROACHES.</p> <p>ROW FENCING SHOULD BE UP SLOPE AS CLOSE TO THE TRAVELWAYS AS POSSIBLE OR REPLACED IN FUNCTION BY TERRACE WALL TO MAXIMIZE LANDSCAPE MAINTENANCE ACCESS -+ SIMILAR TO I-65 NORTH AT METHODIST HOSPITAL AND 10TH STREET UNDERPASS.</p>	<p>INDOT right-of-way limits will be fenced at the edge of the identified right-of-way. INDOT will review exceptions provided in final design by the design-build team. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 8 Fencing</p> <p>Include a Minimum 10' Setback FROM EDGE OF WALKWAY</p>	<p>The current graphic illustrates 10-foot setback from edge of walkway.</p>
<p>Aesthetic Design Guidelines Attachment: Page 9 Major Gateway Bridge Application Double Span at Monon & Lewis Street</p> <p>NO FENCE NECESSARY. ALL CITY ROW UNDER BRIDGE</p> <p>TURF OR LANDSCAPE BETWEEN BRIDGE SPANS</p> <p>MAJOR GATEWAYS SHOULD HAVE GATEWAY SURFACING</p>	<p>The right-of-way fence along the Monon Trail is replaced to match the existing condition. This fence separates the Monon Trail right-of-way owned by the City of Indianapolis from the right-of-way of the former Nickel Plate Railroad line, which is owned by Fishers, Noblesville, and Hamilton County. The fence extends north to 33rd Street where the two former rail corridors diverge from each other.</p> <p>Turf is recommended at the bridge span and the surfacing is called out to be the “major gateway surfacing.”</p>
<p>Aesthetic Design Guidelines Attachment: Page 9 Major Gateway Bridge Application Double Span at Monon & Lewis Street</p> <p>WE FIND NAMES CONFUSING AND DON'T THINK THEY ARE NEEDED</p>	<p>The text on the bridges represents a graphic illustration. The original intent was to include the local street name, not the interstate name. The final decision regarding graphics shall be made during final design. This comment will be shared with the landscape architect developing final design as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 10 Bridge Application</p> <p>THIS IMPLIES THERE IS NO SIDEWALK ON THE ST. CLAIR UNDERPASS. RETHINK STRONGLY URGES THAT THE PEDESTRIAN SYSTEM BE CONTINUOUS. ST. CLAIR STREET IS ONE OF THE FEW STREETS THAT CONNECTS THE EAST SIDE TO DOWNTOWN AND ON TO INDIANA AVE AND THE BUFFERED SIDEWALK SHOULD BE REQUIRED FOR THIS UNDERPASS.</p>	<p>The “planting and lighting buffering zones” note for St. Clair Street Crossing is highlighting the unique instance where space is available for a planting and buffering zone in addition to sidewalks. Sidewalks are still included on St. Clair Street.</p>
<p>Aesthetic Design Guidelines Attachment: Page 10 Bridge Application</p> <p>MINIMIZE EXPANSE OF TALL MSE WALL AT</p>	<p>Please see comment on page 19 about planting terraces.</p>

<p>BRIDGE APPROACHES WITH SINGLE TERRACE</p> <p>PLANT TERRACE SLOPES, SEE 10TH STREET EXAMPLE IN PHOTO</p>	
<p>Aesthetic Design Guidelines Attachment: Page 11 Standard Underpass Surfaces</p> <p>COMMERCE/ ROOSEVELT IS A MAJOR CONNECTOR LINKING HILLSIDE AND WINDSOR PARK NEIGHBORHOODS THROUGH I-70. APPLY SURFACE TREATMENT FINISHES SIMILAR TO ALABAMA ST.</p> <p>SEE LIGHTING COMMENT PAGE 5</p>	<p>The bridges at Commerce/Roosevelt will not be replaced as part of the project. New lighting will be installed at the underpass but the sidewalks will remain in place.</p>
<p>Aesthetic Design Guidelines Attachment: Page 12 Landscape Overview</p> <p>WE SUPPORT THESE LANDSCAPE CONCEPTS EXCEPT AS NOTED AND WITH THE FOLLOWING QUALIFICATION:</p> <p>APPLICATION THROUGHOUT OF STANDARD SIDE SLOPE GUIDANCE AS INFERRED IN ILLUSTRATIONS SHOULD BE AVOIDED IF THERE IS SPACE FOR SHALLOWER SLOPES.</p>	<p>The design-build team will provide final grading plans for areas including the side slopes during final design for review and approval by INDOT. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 12 Landscape Overview</p> <p>For Typology 2: 10' Buffer Zone – The 10' Buffer-Zone is intended to maintain a set-back for [insert <i>tall</i>] plantings so there is no interference between the landscaped areas and roadway functions.</p>	<p>The buffer-zone contains no plantings. The buffer-zone is only specified to be eco-lawn seed mix (reference North Split Aesthetic Design Guidelines page 49, seed mix).</p>
<p>Aesthetic Design Guidelines Attachment: Page 12 Landscape Overview</p> <p>For Typology 3: Side Slope Plantings</p> <p>ONLY WHERE SLOPES ARE NOT GREATER THAN 3 HORZ. TO 1 VERTICAL. OTHERWISE PERMANENT INFRASTRUCTURE SHOULD BE USED SUCH AS INTERMEDIATE TERRACIES AND WALLS.</p>	<p>Permanent infrastructure and terracing (additional walls) are not included in existing side slope plantings. They are just vegetated slopes.</p>
<p>Aesthetic Design Guidelines Attachment: Page 12 Landscape Overview</p> <p>Insert:</p> <p>TYOLOGY 7: BERMS BERMS SHOULD BE INTEGRATED INTO THE LANDSCAPE CONCEPT AND DESIGNED TOGETHER TO ACHIEVE A COHERENT DESIGN.</p>	<p>Berms, if utilized, are currently integrated into Typology 5 and 6. The final grading plan and planting plan is to be provided by the design-build team for INDOT approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p> <p>Please see comment on page 18 about earthen berms.</p>

<p>Aesthetic Design Guidelines Attachment: Page 13 Landscape Overview</p> <p>NATURALIZED PLANTINGS SHOULD BE DEFINED AS A “DESIGNED NATURALIZED LANDSCAPE” RATHER THAN AD HOC SUCCESSIONAL PLANTINGS WHICH NOW CHARACTERIZE SOME OF THE “DO NOT DISTURB” AREAS IN WHICH ‘SURVIVOR’ SPECIES DOMINATE. EXPAND THE BUFFER CONCEPT TO LARGER SPATIAL UNITS WHERE MEADOWS/ PRAIRIES AND MASSED PLANTING GROUPS ARE INTEGRATED INTO THE INTERCHANGE BERMS/ LAND FORMS.</p>	<p>The request to define “Naturalized Plantings” as “Designed Naturalized Landscape” is a nomenclature suggestion. The comment is noted.</p> <p>The Buffer Zone typology is described as the no-mow seed mix. The Buffer Zone is intended to provide the unobstructed viewshed adjacent to interstate and roadway corridor functions. The other typologies allow for various meadows/ prairie/mass planting groups.</p>
<p>Aesthetic Design Guidelines Attachment: Page 14 Quantities for Cost Estimating</p> <p>EVERGREENS SHOULD BE THE DOMINANT PLANTING ALONG NOISE WALL. SPACING SHOULD VARY BASED ON SPECIES SELECTED.</p>	<p>Evergreens are the dominate plantings in the Screen Plantings typology, at a 2 to 1 ratio. Planting plans will be developed by the design-build team and provided to consulting parties for review and comment per the MOA.</p>
<p>Aesthetic Design Guidelines Attachment: Page 14 Quantities for Cost Estimating</p> <p>USE VINE PLANTINGS ON INTERSTATE SIDE OF NOISE BARRIER WALL</p>	<p>Vines and climbing vegetation are not proposed due to maintenance considerations.</p>
<p>Aesthetic Design Guidelines Attachment: Page 15 Typology 2: 10’ Buffer-Zones</p> <p>THE 10-FOOT BUFFER ZONE IS A GOOD CONCEPT.</p> <p>PLEASE ADD THE WORD “NATURALIZED” PRECEDING “PLANTINGS” TO MAKE IT MORE CLEAR.</p>	<p>Buffer zones are applicable for all plantings, regardless of planting application.</p> <p>The request to define “Naturalized Plantings” as “Designed Naturalized Landscape” is a nomenclature suggestion. The comment is noted.</p>
<p>Aesthetic Design Guidelines Attachment: Page 16 Typology 2: 10’ Buffer-Zones</p> <p>FLIP RELATIONSHIP - TREE SHOULD BE BETWEEN SIDEWALK AND CURB.</p>	<p>The prototypical illustration is intended to show application to an existing condition, with trees preserved adjacent to the pedestrian walk. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p>
<p>Aesthetic Design Guidelines Attachment: Page 17 Typology 3: Typical Side Slope Conditions</p> <p>AMENDED CONDITION B TO PROVIDE SIDEWALK BETWEEN TALBOT AND COLLEGE</p> <p>AMENDED CONDITION D TO PROVIDE SIDEWALK BETWEEN THE MONON TRAIL/O’BANNON PARK & COMMERCE</p>	<p>Sidewalks or trails within INDOT’s limited access right-of-way will not be provided at these locations.</p> <p>A sidewalk between Talbot Street and College Avenue within the City right-of-way along the south side of 12th Street would likely require tree removal and possibly impact limestone curbs within the Old Northside Historic District.</p> <p>A sidewalk between the Monon Trail and Commerce would require additional right-of-way, which has been avoided for this project.</p>
<p>Aesthetic Design Guidelines Attachment: Page 18</p>	<p>Please see comment on page 19 about planting terraces.</p>

<p>Typology 3, Conditions C & B</p> <p>TERRACE NEEDED AT UNDERPASS VERTICAL WALL TO SIDE SLOPE TRANSITION TO MINIMIZE LARGE FLAT MSE WALL AT LOCATIONS WHERE WALL HEIGHT EXCEEDS TEN FOOT HEIGHT COMMITMENT.</p>	
<p>Aesthetic Design Guidelines Attachment: Page 18 Typology 3, Conditions C & B</p> <p>PROVIDE SIDEWALK FROM TALBOT TO COLLEGE</p> <p>Aesthetic Design Guidelines Attachment: Page 19 Typology 3, Conditions C & B</p>	<p>Sidewalks or trails within INDOT’s limited access right-of-way will not be provided at this location.</p>
<p>Aesthetic Design Guidelines Attachment: Page 19 Typology 3, Conditions C & B</p> <p>PLANTING ALONG SOUND WALL SHOULD BE DENSE WITH EVERGREENS</p>	<p>Evergreens are the dominate plantings in the Screen Plantings typology, at a 2 to 1 ratio. Planting plans will be developed by the design-build team and provided to consulting parties for review and comment per the MOA.</p>
<p>Aesthetic Design Guidelines Attachment: Page 19 Typology 3, Conditions C & B</p> <p>PROVIDE SIDEWALK FROM COMMERCE TO MONON TRAIL/ O’BANNON PARK</p>	<p>Sidewalks or trails within INDOT’s limited access right-of-way will not be provided at this location.</p>
<p>Aesthetic Design Guidelines Attachment: Page 19 Typology 3, Conditions C & B</p> <p>PLANT VINES ALONG SOUND BARRIER ON INTERSTATE SIDE</p>	<p>Vines and climbing vegetation will not be used due to maintenance considerations.</p>
<p>Aesthetic Design Guidelines Attachment: Page 20</p> <p>TALL WOODY SHRUBS CAN BE PLANTED IN THE BUFFER ZONE WHICH WOULD HAVE A TENDENCY TO MINIMIZE INVASION BY SHADE TREES MINIMIZING FUTURE INDOT MAINTENANCE.</p>	<p>The intent of the buffer zone is to be clear of vegetation to avoid any conflict with future growth of woody vegetation adjacent to the infrastructure.</p> <p>The section provided in the comments does not relate to the sketch in the Aesthetic Design Guidelines, as the sketch view is inside the interchange, not adjacent to 12th Street as the section provided in the comment.</p>
<p>Aesthetic Design Guidelines Attachment: Page 21</p> <p>GRADING THE INTERCHANGE AND UTILIZING SOILS TO SHAPE THE EARTH CAN BE SUPPORTED BY RETHINK IF SUFFICIENT REVIEW IS PROVIDED DURING THE DESIGN PROCESS.</p>	<p>The final grading plan and planting plan is to be provided by the design-build team for INDOT approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p> <p>Please see comment on page 18 about earthen berms.</p>
<p>Aesthetic Design Guidelines Attachment: Page 22</p> <p>MODIFY BERM LOCATION/SHAPE TO FOLLOW ROADWAY EDGE AND KEEP OPEN SPACE ON PARK/TRAIL SIDE. INCORPORATE DETENTION AREA ALONG LENGTH OF BERM OR RELOCATE TO THE CENTER OF THE INTERCHANGE.</p>	<p>The final grading plan and planting plan is to be provided by the design-build team for INDOT approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p> <p>Please see comment on page 18 about earthen berms.</p>
<p>Aesthetic Design Guidelines Attachment: Page 23</p>	<p>The final grading plan and planting plan to be provided by</p>

<p>GRADING THE INTERCHANGE AND UTILIZING SOILS TO SHAPE THE EARTH CAN BE SUPPORTED BY RETHINK IF SUFFICIENT REVIEW IS PROVIDED DURING THE DESIGN PROCESS. THE OUTCOME SHOULD BE SOFTER AND MORE NATURAL LOOKING THEN SHOWN IN THIS SKETCH.</p>	<p>design-build team for INDOT approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p> <p>Please see comment on page 18 about earthen berms.</p>
<p>Aesthetic Design Guidelines Attachment: Page 23</p> <p>IT SEEMS LIKE THE BERM SHOWN IN THIS SKETCH SHOULD BE ROTATED 90 DEGREES TO SCREEN THE INTERSTATE. SEE SKETCH PLAN</p>	<p>The final grading plan and planting plan to be provided by design-build team for INDOT approval. This comment will be shared with the landscape architect developing final designs as part of the design-build team.</p> <p>Please see comment on page 18 about earthen berms.</p>
<p>Aesthetic Design Guidelines Attachment: Page 24</p> <p>RETHINK SUPPORTS REQUEST FOR THE SW PORTION TO BE PERMANENT</p>	<p>Thank you for providing feedback on the trail.</p>