



MEETING AGENDA

Date: January 16, 2020

Time: 4:30 to 6:30 p.m.

Meeting: North Split Consulting Parties Meeting #7

Location: Ivy Tech Community College Culinary and Conference Center, Indianapolis, IN

1. Welcome & Introductions
2. Purpose of Meeting
3. Section 106 Steps
4. Archaeology Update
5. Traffic Noise Barrier Update
6. Section 106 800.11(e) Documentation
7. Design Modifications
8. Possible Mitigation Ideas
9. Next Steps
10. Discussion and Questions
11. Adjourn



MEETING SUMMARY

Date: January 16, 2020
Time: 4:30 to 6:30 p.m.
Meeting: North Split Consulting Parties Meeting #7
Location: Ivy Tech Culinary and Conference Center

**Complete attendee list begins on page 9.*

1) Welcome & Introductions

Kia Gillette from HNTB called the meeting to order at 4:35 p.m. Kia welcomed everyone, and all meeting participants in the room and on the telephone introduced themselves.

2) Purpose of Meeting

Kia reviewed the agenda with meeting participants.

3) Section 106 Steps

Kia reviewed the steps of the Section 106 process for the North Split.

Two of the four main steps under the Section 106 process are completed:

1. Initiate Consultation
2. Identify Historic Properties

Step 3 of the Section 106 process is being completed:

3. Assess Effects of Undertaking on Historic Properties
 - a. Assessment of Effects Report/Consulting Party meeting – completed.
 - b. Noise Analysis/Noise Barrier Addendum/Consulting Party meeting – completed.
 - c. The Jan. 16, 2020, meeting focuses on the 800.11 (e) Document/Finding/Mitigation ideas.

Following this meeting, the North Split Project Team will move to Step 4, which involves drafting, reviewing, and finalizing the Memorandum of Agreement (MOA) to resolve adverse effects. There will likely be another Consulting Parties meeting for this step.

4) Archaeology Updates

Three archaeology reports have been completed. Phase 1a Archaeology Report #2 identified one archaeology site, which was an abandoned railroad bed. The portion of the railroad bed in the North Split project area was determined to not be eligible for the National Register of Historic Places (NRHP). The State Historic Preservation Office (SHPO) concurred with this finding on Dec. 16, 2019.

5) Traffic Noise Barrier Update

Kia described the preliminary noise barrier recommendations.

- INDOT recommends construction of Noise Barrier 3E and Noise Barrier 3W, on westbound I-70 along the edge of the north shoulder from Valley Avenue to Commerce Avenue and from Commerce Avenue to Lewis Street, near the Martindale-Brightwood neighborhood.
- INDOT does not recommend construction of proposed Noise Barriers 4, 5, or 7 along the inner loop.

6) Section 106 800.11(e) Documentation

The Section 106 800.11(e) Document is over 1,200 pages in length, so it cannot be emailed.

However, the document is available on the IN SCOPE website

(<http://erms.indot.in.gov/Section106Documents/>) and the North Split website (northsplit.com).

The 800.11 (e) documentation contains:

- A description of the undertaking
- A description of the steps to identify historic properties
- A description of historic properties
- A description on the effects of historic properties
- An explanation of adverse effects
- Measures to avoid, minimize, or mitigate adverse effects
- Views of Consulting Parties
- Official effect finding for proposal – Adverse Effect

Comments on the 800.11(e) Document are due January 31.

7) Design Modifications

There have been some minor design modifications since publication of the 800.11(e) document, but there are no recommended changes to effect findings. The minor design modifications will be outlined in Update Memo #9 for Consulting Parties' feedback.

Following the completion of the Section 106 review process, the design-build contractor will move to the final design stage. During that time, there is a possibility that additional changes will occur. INDOT and FHWA will review the changes and determine if the modifications have the potential to cause adverse effects to historic properties. If not, the changes will be documented in the project record. If they are not sure, they may consult with the SHPO to determine if Section 106 consultation needs to be re-opened. This process will be included in the Memorandum of Agreement (MOA) for Section 106.

8) Possible Mitigation Ideas

Kia provided an overview of Section 106 mitigation. Mitigation is compensation for the diminishment of a historic property and is only completed for adverse effects to historic properties. The historic properties are:

- Old Northside Historic District/Morris-Butler House
- St. Joseph Neighborhood Historic District
- Chatham-Arch Historic District

Mitigation should relate to the historic property's significance and address the nature of adverse effects. Mitigation measures will be documented in the MOA. The MOA will provide a written understanding of the measures to mitigate adverse effects to historic properties in order to ensure everyone understands the mitigation measures. Parties to sign the MOA are described below:

- FHWA, the SHPO, and Advisory Council on Historic Preservation (ACHP) are required signatories.
- INDOT and any party who assumes a responsibility under the MOA are invited signatories.
- Consulting Parties can sign the MOA as concurring parties.

Consulting Parties are encouraged to comment on these proposed mitigation ideas by January 31. They will also receive a draft MOA for review prior to the final version.

Possible mitigation ideas include:

1. Tree preservation and plantings

Kia reviewed a slide showing the North Split construction "Do Not Disturb" areas. The goal for the Do Not Disturb areas is to preserve existing vegetation.

There are 3 locations for the Do Not Disturb areas:

- a. North side of I-65 from College Avenue to Alabama Street
 - i. The design-build contractor will be allowed to work 15 feet north of the retaining wall. There will be a Do Not Disturb area north of that.
- b. Pockets along the south side of I-65 from Delaware Street to College Avenue
- c. West side of I-65/I-70 from Michigan Street to New York Street

There are large drainage pipes under some of the Do Not Disturb areas. The contractor will be allowed to work within that Do Not Disturb areas to install lateral drainage connections. However, the contractor will not be allowed to remove any trees with trunks larger than 2 inches in diameter at breast height (dbh).

Preserving the trees will require a taller retaining wall or a wall where one wasn't proposed before. The North Split Project Team originally committed to a wall no taller than 12 feet along I-65. However, the ground is not always the same elevation and there will be some areas where the slope would need to be made steeper to accommodate the 12-foot minimum commitment. The steeper slope would require removal of existing vegetation.

In the area near Lockerbie Square, the retaining wall will be a maximum of five to six feet in height. No retaining wall was originally proposed at this location. Along the north leg of the interstate, the wall will be an average of approximately 12 feet, with a maximum of 16 feet, in order to maintain the existing slope and retain the existing trees.

The North Split Project Team is seeking Consulting Parties' feedback regarding whether some of the existing earthen berms that are no longer needed with the revised interchange design should be retained to provide visual shielding for historic districts. This includes the northern-most earthen berm that currently carries I-70 westbound to I-65 northbound, which could provide visual shielding for the Old Northside Historic District and O'Bannon Park from the interchange ramps. It could also include the earthen berm in the

southwestern quadrant that currently carries I-65 southbound to the C-D road, which could provide visual shielding for the Chatham Arch Historic District from the interchange ramps. The pavement would be removed and the earthen berms could be left in place for visual screening from the interchange or they could be removed. Either way, the area could be planted with trees.

2. Connectivity improvements

Kia reviewed connectivity improvements that could result from Section 106 mitigation.

- The North Split project will not replace the Alabama Street bridge; however, new lighting and signage highlighting the Old Northside and St. Joseph neighborhoods could be added.
- Central Avenue and College Avenue underpasses would be replaced and will have wider sidewalks, new lighting on the bridge, elimination of drainage from the bridge, vertical bridge walls and space for murals. The bridge widening will respond to feedback from the neighborhoods to enhance connectivity. The lighting would be higher quality than standard underpass lighting.
- Although the brick pavement area on 10th Street between New Jersey Street and Central Avenue is not expected to receive construction traffic, temporary signs will be installed to ban construction and truck traffic.
- The North Split Project Team have met with leadership from the Benjamin Harrison Presidential Site about mitigation efforts that could include funding for an Old Northside connector, a proposed pedestrian and bicycle path south of the Benjamin Harrison Presidential Site to Pennsylvania Street.
- As part of the North Split construction, INDOT will widen and construct a portion of the Monon Trail that ties into the Cultural Trail to use as a detour during construction. INDOT will leave the portion north of the interchange and along College Avenue as a permanent feature after construction. The City of Indianapolis will maintain this new trail segment.

3. Education/Interpretation/Community Outreach

INDOT proposed creating an oral history initiative with community input. The oral history initiative would capture the history of historic neighborhoods surrounding the North Split, the history of the planning and construction of the original interstate, the impacts resulting from the construction, and a description of revitalization efforts. The oral history could be communicated via a documentary film, podcast, website, traveling exhibit, or another publicly accessible format.

4. Vibration monitoring and control plan

The design-build contractor will create a vibration monitoring and control plan that includes:

- Buildings within historic properties or districts within 140 feet of construction
- Identifying buildings sensitive to vibration; the contractor will initiate both pre- and post-surveys
- Conducting pre-construction surveys of historic buildings
- Developing and implementing a vibration monitoring program for construction activities to ensure vibration does not exceed maximum levels of 0.20 in/sec for “fragile” and 0.12 in/sec for “extremely fragile” buildings
- Phasing construction activities that create vibration

- Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours
- Developing a method for responding to community complaints
- Keeping the public informed of proposed construction schedules
- Conducting post-construction surveys

Consulting Parties will be able to review and comment on the vibration monitoring and control plan. The design-build contractor will be responsible for repairs if vibration damage does occur. Any repairs would be coordinated with the SHPO so they are in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Consent will be obtained prior to the contractor's entry to privately owned property for monitoring or damage repair.

9) Next Steps

- January – Receive Consulting Party comments on possible mitigation ideas and 800.11(e) documentation.
- January – Section 106 Update Memo #9 sent for Consulting Party review.
- February – Consulting Party comments due on Section 106 Update Memo #9.
- February – Draft MOA sent for Consulting Party review.
- April – Final MOA sent for signatures.

There may be another Section 106 Consulting Parties meeting in March after the draft MOA is sent out for review. She reminded the Consulting Parties to submit their comments. The meeting slide presentation will be emailed to the Consulting Parties.

10) Discussion and Questions

Q: Why will Noise Barrier 3E and Noise Barrier 3W be constructed and not the other noise barriers?

A: A majority of surveys were returned in favor of Noise Barriers 3E and 3W. A majority of surveys were returned in the area of Noise Barrier 4 requesting the barrier not be constructed. Survey responses for Noise Barriers 5 and 7 were split. INDOT made the decision to not construct these barriers based on other factors, including concerns from the SHPO and other Consulting Parties about effects to historic properties.

Q: When you say "historic properties," identified as having adverse effects, you identified three historic districts and one building when there are other individual properties within those districts that are historic. Are all properties viewed individually or as part of the district? The North Split construction will have more of an impact on the Indiana Landmarks building.

A: Individual historic properties in those historic districts are protected within those districts.

Q: Do the historic district boundaries follow the National Register boundaries or local district boundaries?

A: The historic district boundaries are National Register boundaries. If construction impacts something within local historic district boundaries, the North Split Project Team will work with the Indianapolis Historic Preservation Commission. Most of the North Split construction work will be within the INDOT right-of-way, but there may be some work on the local streets.

Q: How will the new North Split retaining walls compare to what was originally proposed?

A: The retaining walls would be taller than what was originally proposed (north of I-65) or present where a wall was not originally proposed (west of I-65/I-70 near Lockerbie). The wall would come down to the existing slope, which would allow preservation of existing trees.

Q: Can you terrace the slopes of the retaining walls?

A: The slopes could likely be terraced. However, if the slopes are terraced, the existing trees would need to be removed. The terrace would also need to be maintained, long-term.

Q: Does the steepness of the slope grade prohibit trees from growing?

A: It depends on the slope. On a 3:1 slope ratio, almost anything can grow. On a 2:1 slope ratio, trees and shrubs may be able to grow, and on a 1:1 slope ratio, trees would not be planted. If a new slope is constructed, existing trees will need to be removed since fill cannot be placed around existing trees.

Q: Where does the 15-foot buffer start?

A: The buffer starts at the edge of the retaining wall north of I-65 to provide the contractor room to construct the new wall.

Q: Has INDOT considered planting green infrastructure (climbing vines or ivy) to provide a backdrop to the retaining walls?

A: This has not been defined as a project element, but INDOT has previously planted climbing greenery on retaining walls. For example, the roads at Keystone Avenue and U.S. 31 have retaining walls with ivy that were planted per the request of residents. The challenge is that the climbing vines are not aesthetically pleasing during winter months.

Q: Is the Do Not Disturb area on the Davidson Street side of highway the extent of the area being addressed on that leg of the interchange?

A: INDOT is focusing on areas where there is the most concern for existing trees, and where trees are more dense. If there are additional areas the North Split Project Team should be preserving, the Team is open to that.

Q: What is your experience with the Do Not Disturb area and the survival of trees during construction?

A: Since the contractor will not disturb trees in the Do Not Disturb area, except to tie into drainage, the trees are likely to survive. If there is a concern about the survival of the existing trees as the result of construction, INDOT might need to replant them.

Q: At what point will you make the decision about the retaining walls and tree plantings?

A: The North Split Project Team is asking for Section 106 Consulting Parties comments by the January 31, 2020, deadline. The decision will be made after reviewing the Consulting Parties feedback.

Q: Will slope and retaining wall treatments vary by location in the North Split project area?

A: They can vary, but the North Split Project Team is looking for some continuity in the general area on the preferred slope treatment.

Q: When do you need Consulting Parties comments?

A: Comments are due by January 31, 2020. (Note: this was originally January 24.) The North Split Project Team will send out Update Memo #9 for review later in January.

Q: Wouldn't INDOT normally do the "connectivity improvements" described for the underpasses, at least in similar urban situations?

A: Some of the improvements (such as the vertical abutment walls) would be done in urban situations; however, most (such as wider sidewalks, wider bridge openings and lighting fixture upgrades) are being done in response to comments we've heard from the public.

Q: Will Update Memo #9 include the slide presentation?

A: The Consulting Parties slide presentation will be distributed the day after the Jan. 16, 2020, meeting.

Q: What will the earthen berms look like after the pavement is removed?

A: The contractor will either leave the earthen berms or will use the earth as fill for other parts of North Split construction. It would likely be preferable to the contractor to use the material as fill for the project. This will depend on the feedback the North Split Project Team receives from Consulting Parties.

Q: When the old roadway pavement is removed, will the unused land be open to public access?

A: What happens after North Split construction is completed is a conversation that residents are encouraged to have with INDOT and the City of Indianapolis. There will be no transfer of land as part of the North Split Project.

Q: Will there be detention basin or wetlands as part of the North Split project?

A: There will be a detention basin, which will be dry most of the time.

Q: Will the design and use of earthen berms dictate possible future use of the land?

A: Possible future use could be considered as well as visual screening for the existing neighborhoods. It is unlikely the berms would inhibit or preclude any land use changes in the area. The berms could be removed at a later time if desired by the community.

Q: Will INDOT retain control of the remaining unused land after the North Split Project is over?

A: There are no current plans to transfer the land.

Q: Restoring the grid isn't something INDOT is considering?

A: This is not part of the North Split Project. However, INDOT is talking with the City of Indianapolis about possibly assisting with a connection at 10th Street and Lewis Street, if the City can provide the right-of-way.

Q: Who manages the INDOT-owned park? Couldn't the unused land be converted to something like that?

A: The City of Indianapolis manages O'Bannon Park. INDOT and the City of Indianapolis would

need to have the conversation about use of additional land. These conversations can continue now and after the North Split Project is complete. Meanwhile, the North Split Project is moving forward and land transfer is not a part of the North Split Project.

Q: Can you plant trees on the earthen berms after the pavement is removed?

A: Yes.

Q: How does the Section 106 Consulting Parties conversation fit in with Context Sensitive Solutions (CSS) process?

A: The processes are separate but related. The North Split Project Team will meet with the Rethink Coalition early in February to discuss the CSS Process. The Project Team is still working to define CSS components.

Q: How does Section 106 mitigation fit into CSS process?

A: Mitigation for adverse effects to historic properties is the concern of Section 106, and a binding MOA will be prepared as part of that process.

Q: What about extending the Monon Trail around the Bottleworks area?

A: That is not currently planned due to the existing nearby pedestrian connection at College Avenue and 10th Street.

Q: The Saint Joseph neighborhood would like additional options to ensure truck traffic does not enter the brick area of 10th Street. Could a balustrade be erected to limit the size of vehicle that can travel through the road?

A: The North Split Project Team will coordinate with the City of Indianapolis about the suggestion of a temporary barrier.

Comments

The Rethink Coalition is working on a management entity to establish maintenance of land beyond what INDOT would normally provide. Maintenance is an issue the neighborhoods cannot undertake. We need to understand the trade-offs for the different slopes. The Rethink Coalition would like a mixed variety of trees planted randomly.

The earthen berms should not be left as-is. The land should be sculpted and designed to add interest to the ground or expand the existing park to make it useful and enjoyable. The selling point given to the public for shrinking the North Split interchange was providing more green space.

The original boards at public meetings showed flat space in the interchange and around overpasses with people walking. The neighborhoods mow and pick up trash on both sides of highway. The Holy Cross neighborhood would like fewer slopes because they are difficult to maintain. Also, in meetings, we were told we could terrace the slopes, but the neighborhoods had to do the vegetation planting.

We haven't heard anything about the response to the CSS process. We need a comprehensive solution for the North Split that accomplishes multiple goals.

Soundproofing of certain historic properties should be part of the mitigation process. Indiana Landmarks is obtaining an estimate for doing so and will provide that to the North Split Project Team.

11) Adjourn

Kia Gillette adjourned the meeting at 6 p.m.

Attendees:

Project Team	
Kia Gillette	HNTB
Seth Schickel	HNTB
John Myers	HNTB
Michelle Allen	FHWA
Patrick Carpenter	INDOT
Anuradha Kumar	INDOT
Anthony Ross	INDOT
Runfa Shi (INDOT)	INDOT
Dave Cleveland	Corradino Group
Leah Konicki	ASC Group
Ron Taylor	TSW Design Group
Erin Pipkin	Compass Outreach Solutions
Amy Hanna	Borshoff


Consulting Parties	
Hilary Barnes	Old Northside Neighborhood Association
Garry Chilluffo	Historic Urban Neighborhoods of Indianapolis
Marsh Davis	Indiana Landmarks
Charles Hyde	Benjamin Harrison Presidential Site
Joe Jarzen	Keep Indianapolis Beautiful, Inc.
Marjorie Kienle	Historic Urban Neighborhoods of Indianapolis/Lockerbie Square People's Club
Betsy Merritt (phone)	National Trust for Historic Preservation

Meg Purnsley (phone)	Indianapolis Historic Preservation Commission
Jordan Ryan (phone)	North Square Neighborhood Association
Mandy Ranslow (phone)	ACHP
Chad Slider	IDNR – Division of Historic Preservation and Archaeology
Meg Storrow	Massachusetts Avenue Merchants Association
Kelly Wensing (phone)	Holy Cross Neighborhood Association



Welcome/Meeting Agenda


1. Welcome & Introductions
2. Purpose of Meeting
3. Section 106 Steps
4. Archaeology Update
5. Traffic Noise Barrier Update
6. Section 106 800.11(e) Documentation
7. Design Modifications
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Section 106 Steps for North Split Project

1. **Initiate Consultation**
 - Early Coordination/APE Letter (Sept. 19, 2017)
 - Consulting Parties Meeting (Oct. 6, 2017)
2. **Identify Historic Properties**
 - Historic Property Report/Consulting Parties Meeting #2 (Jan. 26, 2018)
 - North Split Alternatives/Historic Property Report Additional Information for Traffic/Consulting Parties Meeting (Oct. 17, 2018)
3. **Assess Effects of Undertaking on Historic Properties**
 - Effects Report/Consulting Parties Meeting (Aug. 29, 2019)
 - Noise Analysis/Noise Barrier Addendum/Consulting Parties Meeting (Oct. 29, 2019)
 - 800.11(e) Document/Finding/Mitigation/Consulting Parties Meeting
4. **Resolve any Adverse Effects**
 - Draft Memorandum of Agreement (MOA) for Review
 - Final MOA for Signatures

We are here




Archaeology Update

1. Phase Ib Archaeology Report
2. Phase Ia Archaeology Report #1
3. Phase Ia Archaeology Report #2
 - One archaeology site identified
 - Abandoned railroad bed
 - Portion in project area determined not eligible for National Register
 - SHPO concurred on Dec. 16, 2019






Traffic Noise Barrier Update



Traffic Noise Barriers

Preliminary Noise Barrier Recommendations

- INDOT recommends construction of NB3E and NB3W
- INDOT does not recommend construction of NB4, NB5, or NB7

Section 106 800.11(e) Documentation

800.11(e) Documentation

- From Section 106 regulations
 - Description of the undertaking
 - Description of steps to identify historic properties
 - Description of historic properties
 - Description of effects on historic properties
 - Explanation of adverse effects
 - Measures to avoid, minimize, or mitigate adverse effects
 - Views of consulting parties
 - Official effect finding for project – Adverse Effect
- Available on IN SCOPE (<http://erms.indot.in.gov/Section106Documents/>)

Design Modifications

Design Modifications

- Minor design modifications since publication of the 800.11(e) document
- No recommended changes to effect findings
- To be discussed in Section 106 Update Memo #9
- Post-Section 106 review design modifications
 - Design-build project
 - Process included in the Memorandum of Agreement (MOA)
 - FHWA will determine if modifications have the potential to cause adverse effects
 - If not, FHWA will document in the project record
 - If uncertain, FHWA could consult with SHPO
 - If yes, Section 106 consultation is re-opened

Possible Mitigation Ideas

Mitigation for Adverse Effects

- Mitigation is compensation for the diminishment of a historic property
- Mitigation for Adverse Effects to historic properties
- Adverse Effects
 - Old Northside Historic District/Morris Butler House
 - St. Joseph Neighborhood Historic District
 - Chatham-Arch Historic District
- Mitigation should relate to the historic property's significance and address the nature of the adverse effect(s)
- Mitigation measures will be documented in a Memorandum of Agreement (MOA)

Memorandum of Agreement (MOA)

- Written understanding of the measures to mitigate adverse effects to historic properties
- Draft MOA will be sent for consulting party review prior to the final version
- FHWA, SHPO, and ACHP are required signatories
- INDOT and any party who assumes a responsibility under the MOA are invited signatories
- Consulting parties can sign as concurring parties



Tree Preservation and Plantings

Do Not Disturb Areas

- North side of I-65 from College Ave. to Alabama St.
 - Design-build contractor allowed to work 15 feet north of retaining wall. Do Not Disturb Area north of that
- South side of Delaware ramp between Delaware St. and Alabama St.
 - Design-build contractor only allowed to install drainage connections to existing pipes in this area. No clearing of trees 2-inch dbh or greater
- West side of I-65/I-70 from Michigan St. to New York St. to preserve existing trees along toe of slope
- Slightly taller retaining wall in order to tie to existing slope, but greater shielding with existing vegetation

Tree Preservation and Plantings



Tree Preservation and Plantings



Tree Preservation and Plantings



Note: Not to scale, for illustrative purposes only.

Tree Preservation and Plantings



Note: Not to scale, for illustrative purposes only.

Tree Preservation and Plantings

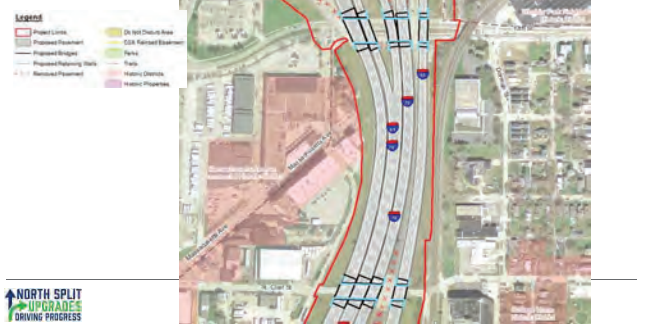
- North side of I-65 from College Ave. to Alabama St. – shrubs to be planted in 15-foot disturbed area between retaining wall and Do Not Disturb Area.
- South side of I-65 between Alabama St. and College Ave. – shrubs to be planted on slope; trees to be planted along toe of slope if space allows.
- Northern earthen berm in interchange where pavement removed – to be maintained with new trees as visual shielding.
- Southwestern earthen berm in interchange where pavement removed – to be maintained with new trees as visual shielding.
- I-65/I-70 south of interchange from 10th St. south to St. Clair St. – new trees to be planted along western side slope if existing vegetation removed by construction.
- Planted trees to be 2-inch dbh or greater.



Tree Preservation and Plantings



Tree Preservation and Plantings



Connectivity Improvements

- Alabama St. underpass – new lighting and signage along Alabama St. identifying Old Northside and St. Joseph neighborhoods.
- Central Ave. underpass – wider bridge opening (65 feet to at least 76 feet), wider sidewalks, new lighting on bridge, vertical bridge walls, elimination of drainage from bridge, and space for murals.
- College Ave. underpass – wider bridge openings (79 feet to at least 87 feet), wider sidewalks, new lighting on bridge, vertical bridge walls, elimination of drainage from bridge, and space for murals.
- 10th St. from Delaware St. to Central Ave. – “No Construction Traffic” and “Local Traffic Only” signs to be installed to protect brick pavement section.



Connectivity Improvements

- Old Northside Connector
 - Funding for a portion and possible right-of-way use for pedestrian and bicycle path connecting alley south of Benjamin Harrison Presidential Site to Pennsylvania St.
 - Contingent on maintenance agreement with the Benjamin Harrison Presidential Site.
- Monon Loop Trail
 - Temporary detour required for the Monon Trail during construction
 - Trail detour in O'Bannon Soccer Park, within INDOT right-of-way west to College Ave. and under College Ave. bridges
 - Portion of trail detour to remain as a permanent feature as part of Indianapolis Greenways System.



Connectivity Improvements



Education/Interpretation/Community Outreach

Oral History Initiative

- To be prepared by INDOT with community input
 - History of historic neighborhoods surrounding the North Split
 - History of planning and construction of the interstate
 - Description of impacts resulting from the construction of the interstate
 - Description of revitalization efforts
- Collected oral histories may be used to develop a documentary film, podcast, website, traveling exhibit, or other publicly accessible format



Vibration

Vibration Monitoring and Control Plan by Design-build contractor to include:

- Buildings within historic properties or districts within 140 ft of construction;
- Identifying buildings sensitive to vibration;
- Conducting pre-construction surveys of historic buildings;
- Developing and implementing a vibration monitoring program for construction activities;
- Phasing construction activities that create vibration;
- Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours;
- Developing a method for responding to community complaints;
- Keeping the public informed of proposed construction schedules; and
- Conducting post-construction surveys.



Vibration

- Vibration levels cannot exceed maximum ppv thresholds (0.20 in/sec for fragile and 0.12 in/sec for extremely fragile buildings).
- Consulting parties to be provided the Vibration Monitoring and Control Plan
- If vibration damage occurs, design-build contractor to be responsible for the cost and repair.
 - Repairs shall be coordinated with the SHPO so they are in accordance with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.
 - Property owners allowing pre and post construction surveys of their buildings.
- Consent shall be obtained prior to entry where access to privately owned property is necessary for monitoring or damage repair.



Next Steps



Section 106 Next Steps

January 2020 – Review consulting party comments on possible mitigation ideas

January 24, 2020 – Section 106 Update Memo #9 sent for consulting party review

February 24, 2020 – Consulting party comments due on Section 106 Update Memo #9

February 25, 2020 – Draft MOA sent for consulting party review

April 2020 – Final MOA sent for signatures



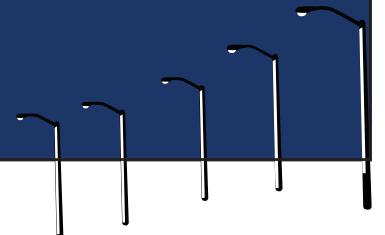
Section 106 Update Memo #8, 800.11(e) Documentation, and mitigation ideas

(search by Des No: 1592385):

<http://erms.indot.in.gov/Section106Documents/>

Submit Comments: kgillette@hntb.com

Comments due January 24, 2020



Public Notice
Des. Nos. 1592385 & 1600808

The Indiana Department of Transportation (INDOT) is planning to undertake the North Split interchange reconstruction project, funded in part by the Federal Highway Administration (FHWA). The project is located at the I-65/I-70 North Split interchange and along the interstate legs from the I-70 Valley Ave. bridge to the east, the I-65/I-70 and Washington St. interchange to the south, and the I-65 Alabama St. bridge (to Illinois St. along 11th St. and 12th St.) to the west, Indianapolis, Indiana.

Under the preferred alternative, the proposed project would involve the replacement of pavement and bridges, and reconstruction of the interchange to correct safety concerns and improve traffic flow. No additional right-of-way will be required and there will be no relocations of homes or businesses.

There are 51 properties listed in or eligible for the National Register of Historic Places (NRHP) located within the Area of Potential Effects (APE). The proposed action impacts properties listed in or eligible for the NRHP. INDOT, on behalf of the FHWA, has issued an "Adverse Effect" finding for the project because the project will diminish the integrity of the characteristics that qualify the Old Northside Historic District, Morris-Butler House, Saint Joseph Neighborhood Historic District, Chatham-Arch Historic District, Massachusetts Avenue Commercial Historic District (if Noise Barrier 7 is constructed), and the Lockerbie Square Historic District (if Noise Barrier 7 is constructed) for inclusion in the NRHP. In accordance with the National Historic Preservation Act, the views of the public are being sought regarding the effect of the proposed project on the historic elements as per 36 CFR 800.2(d), 800.3(e) and 800.6(a)(4). Pursuant to 36 CFR 800.4(d)(2), the documentation specified in 36 CFR 800.11(e) is available for inspection in HNTB's office at 111 Monument Circle, Suite 1200, Indianapolis, Indiana. Additionally, this documentation can be viewed electronically by accessing INDOT's Section 106 document posting website IN SCOPE at <http://erms.indot.in.gov/Section106Documents>. This documentation serves as the basis for the "Adverse Effect" finding. The views of the public on this effect finding are being sought. Please reply with any comments to Kia Gillette, HNTB, 111 Monument Circle, Suite 1200, Indianapolis, Indiana, 317-917-5240, or kgillette@hntb.com no later than January 24, 2020.

In accordance with the "Americans with Disabilities Act", if you have a disability for which INDOT needs to provide accessibility to the document(s) such as interpreters or readers, please contact Rickie Clark at 317-232-6601 or rclark@indot.in.gov.

The Indianapolis Star

130 South Meridian Street
Indianapolis, IN 46225
Marion County, Indiana

Federal Id: 06-1032273

HNTB CORPORATION

Account #:INI-843616
Order #:0003963088
of Affidavits: 1

Total Amount of Claim:\$76.12
This is not an invoice

HNTB CORPORATION
ATTN Kia Gillette
111 MONUMENT CIR STE 1200
INDIANAPOLIS, IN 46204

PUBLISHER'S AFFIDAVIT

**STATE OF WISCONSIN, } SS:
County Of Brown**

Personally appeared before me, a notary public in and for said county and state, the undersigned

I, being duly sworn, say that I am a clerk for THE INDIANAPOLIS NEWSPAPERS a DAILY STAR newspaper of general circulation printed and published in the English language in the city of INDIANAPOLIS in state and county of Marion, and that the printed matter attached hereto is a true copy, which was duly published in said paper for 1 times., the dates of publication being as follows:

The insertion being on the 12/24/2019

Newspaper has a website and this public notice was posted in the same day as it was published in the newspaper.

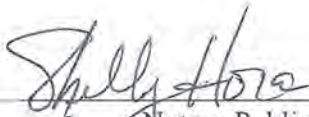
Pursuant to the provisions and penalties of Ch. 155, Acts 1953,

I hereby certify that the foregoing account is just and correct, that the amount claimed is legally due, after allowing all just credits, and that no part of the same has been paid.

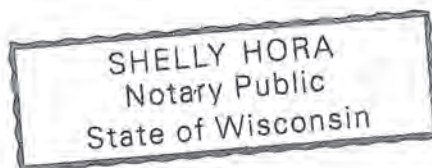


Date: 12/24, 2019 Title: Clerk

Subscribed and sworn to before me this 24 day of December, 2019


Notary Public

Notary Expires: 8-25-23





INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

December 19, 2019

This letter was sent to the listed parties.

RE: Dual Review Project: I-65/I-70 North Split Interchange Reconstruction Project
(Designation (Des.) Numbers (Nos.) 1592385 & 1600808)
IDNR DHPA No. 21534
Section 106 Update Memo #8, Effect Finding, and 800.11(e) Documentation

Dear Consulting Party,

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

Project Location

The proposed undertaking includes the I-65/I-70 North Split interchange; south along I-65/I-70 to the Washington Street interchange; the portion of I-65 west of the North Split interchange to approximately Alabama Street (to Illinois Street along 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.

Section 106 800.11(e) Documentation

The Section 106 800.11(e) Documentation has been prepared for the project. The documentation includes the official Section 106 effect finding for the project as well as a summary of the Section 106 consultation history. The Section 106 800.11(e) Documentation is available for review in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). You are invited to review this document and respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. If you prefer a hard copy of this material, please respond to this email with your request within seven (7) days.

Section 106 Mitigation Ideas

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

A. Tree Preservation and Plantings

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

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

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

B. Connectivity Improvements

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

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

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

C. Education/Interpretation/Community Outreach

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

D. Vibration

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

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

Table 1. Construction Vibration Thresholds (PPV)

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

- c. Consulting parties will be provided the Vibration Monitoring and Control Plan for a 30-day review period. The design-build contractor will be required to respond to consulting party comments.
- d. In the event vibration damage does occur, the design-build contractor will be responsible for the cost and repair of any vibration damage to historic properties. Any repairs shall be coordinated with the SHPO to ensure they are carried out in accordance with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent on property owners allowing pre and post construction surveys of their buildings.
- e. Where access to privately owned property is necessary for monitoring or damage repair, consent shall be obtained prior to entry.

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

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

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

Consulting Parties Meeting/WebEx

We would like to invite you to participate in a Consulting Parties Meeting on January 16, 2020 at the Ivy Tech Community College Culinary and Conference Center, 2820 N. Meridian St., Indianapolis, Indiana 46208, from 4:30 to 6:30 p.m. Indianapolis time. Parking is free in the Ivy Tech Community College parking lot adjacent to the building. You may participate in person or by WebEx and conference call using the information below. At this meeting, we will discuss possible mitigation ideas and next steps in the Section 106 consultation process.

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

Meeting number (access code): 746 594 588

Join meeting

Join by phone

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

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

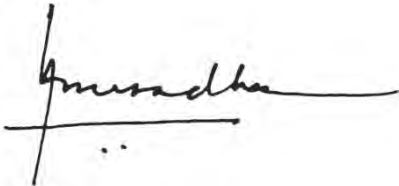
[+1-855-797-9485](tel:+18557979485) US Toll free

Please review the information and comment within 30 calendar days of receipt. For questions concerning specific project details, you may contact Kia Gillette of HNTB Corporation at 317-636-4682 or kgillette@hntb.com. All future responses regarding the proposed project should be forwarded to HNTB Corporation at the following address:

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

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Anuradha', written over a horizontal line.

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

Attachment A - Consulting Party Comments & Responses

Section 106 800.11(e) Documentation

Distribution List:

Chad Slider, IDNR-Division of Historic Preservation and Archaeology
Wade Tharp, IDNR-Division of Historic Preservation and Archaeology
Marsh Davis, Indiana Landmarks
Mark Dollase, Indiana Landmarks
Chad Lethig, Indiana Landmarks & Historic Urban Neighborhoods of Indianapolis
Alesha Cerny, National Park Service, Midwest Region
Marjorie Kienle, Historic Urban Neighborhoods of Indianapolis
Garry Chilluffo, Historic Urban Neighborhoods of Indianapolis
Meg Purnsley, Indianapolis Historic Preservation Commission
Brad Beaubien, Indianapolis Department of Metropolitan Development
Melody Park, Indianapolis Department of Public Works
Garry Elder, Old Northside Neighborhood Association
Nancy Inui, Old Northside Neighborhood Association
Travis Barnes, Old Northside Neighborhood Association
Hilary Barnes, Old Northside Neighborhood Association
Charles Hyde, Benjamin Harrison Presidential Site
Mark Godley, St. Joseph Historic Neighborhood Association
Shawn Miller, Chatham Arch Neighborhood Association
Jeffrey Christoffersen, Lockerbie Square People's Club
Jen Eamon, Windsor Park Neighborhood Association
Jen Higginbotham, Holy Cross Neighborhood Association
Pat Dubach, Holy Cross Neighborhood Association
Kelly Wensing, Holy Cross Neighborhood Association
Jason Rowley, Holy Cross Neighborhood Association
Crystal Rehder, Cottage Home Neighborhood Association
Jim Jessee, Cottage Home Neighborhood Association
Meg Storrow, Massachusetts Avenue Merchants Association
Ruth Morales, Mayor's Neighborhood Advocate, Area 10
Isaac Bamgbose, Hendricks Commercial Properties
David Hittle, NESCO Land Use
Jon Berg, John Boner Neighborhood Centers
Patricia and Charles Perrin, Property Owners
Desiree Calderella, Fountain Square Neighborhood Association
Jordan Ryan, North Square Neighborhood Association
Joe Jarzen, Keep Indianapolis Beautiful, Inc.
Luke Leising, Property Owner
Mark Beebe, American Institute of Architects
Glenn Blackwood, Fletcher Place Neighborhood Association
Jim Lingenfelter, Southeast Neighborhood Land Use Committee
Amina Pierson, Martindale Brightwood Community Development Corporation
Paul Knapp, Interstate Business Group
Betsy Merritt, National Trust for Historic Preservation
Sarah Stokely, Advisory Council on Historic Preservation

Mandy Ranslow, Advisory Council on Historic Preservation
Sandy Cummings, Property Owner
Denise Halliburton, Old Near Westside/Ransom Place
Chelsea Humble, Riley Area Development Corporation
Diane Hunter, Miami Tribe of Oklahoma

Section 106 Update Memo #8

Attachment A

Consulting Party Comments & Responses



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N642
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

Eric Holcomb, Governor
Joe McGuinness, Commissioner

Table B.1: I-65/I-70 North Split Project (Des. Nos. 1592385 & 1600808) – Consulting Party & Public Comments & Responses from October 2, 2019 to December 9, 2019 to Section 106 Update Memo #6, Traffic Noise Barrier Addendum, and Section 106 Update Memo #7

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

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

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

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

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

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

<p>side are listed are “not impacted / not benefited” and there are some properties on our western boundary that are “impacted / benefited”. Can you please clarify the project images on pages seven and eight of Appendix A that do not show Vermont as a red outlined overpass. We would appreciate an explanation as to why Vermont doesn’t have the same treatment as Michigan, New York, Ohio, Market, and Washington overpasses all of which land within our neighborhood boundaries.</p> <p>The report shows some stretches of sound walls would only be placed on one side of the interstate, which according to research can amplify the sounds thrown to the other side. There is also research that shows sounds going over walls can actually be amplified by the walls, which is something a field measurement device at ground level would not be picking up. This says nothing about the aesthetics of having a 19-foot wall on top of the 4-foot traditional barrier on sections of interstate which are not that wide - making this lopsided approach aesthetically displeasing. These walls do absolutely nothing to elevate the look of this scare running through our neighborhood. The minimal sound reduction provided by the sound walls is not worth the additional height to the interstate, which would add visual pollution to our city’s interstate corridor.</p> <p>We believe that maintaining and building on the current urban forest will create a visually more attractive sound barrier, reduce carbon, and help with run off. When the 65/70 project was first announced our neighborhood was told that the urban forest, that we helped KIBI plant on the highway right of way, would be replaced upon project completion. HCNA sees those trees as essential and integral part of softening the highway experience for our neighborhood. These trees will grow and produce a natural sound barrier that includes the added benefit of air filtration and a more pleasant visual experience.</p> <p>HCNA would like to go on record as recommending against solid sound walls within the city loop of the interstate. Our neighborhood is opposed to creating a greater wall through downtown, especially with the minimal reduction of sound that is offered by these barriers. HCNA believes the introduction of new “next-gen” road surface materials and new bridge designs mentioned in the Traffic Noise Technical Report will provide similar noise reduction and be less impactful to our skyline. Money saved from not installing sound barrier walls, which are very expensive, should be reinvested not only in innovative cutting technologies such as pavement, pavement grooving, joint-less concrete bridges, and continuing to build on the urban forest that has already been serving our community.</p>	<p>the Traffic Noise Analysis Procedure if there are noise sensitive receptors on the opposite side of the roadway. These barriers have a minimum noise reduction coefficient (NRC) of approximately 0.70. A noise reduction coefficient is an average rating of how much sound an acoustic product can absorb. An acoustic product with a 0.70 NRC rating means that 70% of sound in the space is absorbed, while the other 30% is reflected.</p> <p>The traffic noise model used by INDOT is designed to account for sound passing over the noise barriers. Field measurements at ground level were not used directly in estimating noise levels. They were only used to validate the traffic noise model for existing conditions before applying it to future designs.</p> <p>See the response to “Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019” and “Interstate Business Group – Paul Knapp – October 18, 2019” for additional information about INDOT’s Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.</p> <p>INDOT’s Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the Holy Cross Neighborhood Association (HCNA) is still important as general project input, which is always welcomed by INDOT.</p>
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Property Owner – Luke Leising – October 30, 2019	
I would like to strongly support the concept of utilizing a East-West trail/walk path along the north side of I65-70 connecting the Monon Trail all the way to Penn as a mitigation strategy. I know that the greater height/visibility and noise only contributes to the lack of accessibility and walkability. Utilizing some of this space to engage the community, provide access and build interconnections would be an excellent mitigation strategy. I also know that this is supported by many of the land owners (like myself) along the route. I see this as a way that the project could leave a stronger neighborhood through this challenging project.	<p>Thank you for the comment. The provision of an east-west trail from the Monon Greenway to Pennsylvania Street was identified as a potential amenity during the CSS process.</p> <p>Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation. One possible mitigation measure includes funding assistance to the Benjamin Harrison Presidential Site for an Old Northside Connector trail from the Talbot Street alley west to Pennsylvania Street.</p>
National Trust for Historic Preservation – Betsy Merritt – October 30, 2019	
<p><i>The version of the Update Memo attached to your October 11 email does not include any of the Attachments. I'm especially interested in the one that apparently responds to the comments regarding adverse effects on the Indiana Landmarks center.</i></p> <p><i>I also checked the project website, but couldn't find it there either. Would it be possible to send the Attachments by email?</i></p>	<i>The Attachments to Section 106 Update Memo #6 were sent to Ms. Merritt on October 31, 2019.</i>
Cottage Home Neighborhood Association – Crystal Rehder – November 1, 2019	
Putting in my request, as a resident in Cottage Home, that barrier walls not be installed anywhere along the inner loop of I-65/70.	<p>INDOT's Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from individuals is still important as general project input, which is always welcomed by INDOT.</p> <p>See the response to "Interstate Business Group – Paul Knapp – October 18, 2019" for additional information about INDOT's Traffic Noise Analysis Procedure.</p>
Indiana Department of Natural Resources – Chad Slider – November 1, 2019	
<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 Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana" ("Indiana Minor Projects PA"); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code ("IAC" 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the above-referenced submission, dated and received on October 11, 2019.</p> <p>Thank you for providing us with copies of the Update</p>	Thank you for your review and concurrence.

<p>Memo #6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report. We agree with the results of your re-examination of effects, in light of consulting party feedback, that the St. Joseph Historic District will also be adversely affected by the undertaking. We also note that additional adverse effects to historic properties may result from the potential construction of noise barriers within the project area.</p>	
<p>While we appreciate the benefit of noise reduction to the adjacent sound receptors, we remain deeply concerned about the visual effect of noise walls on the setting of historic resources, particularly within the St. Joseph Neighborhood, Chatham-Arch, and Old Northside historic districts. We also note the potential for additional adverse effects if noise barriers are constructed adjacent to the Massachusetts Avenue Commercial Historic District and Lockerbie Square Historic District. We believe that the inclusion of noise barriers up to 19 feet above the freeway would introduce an additional and severe adverse effect to the character and setting of these resources, and greatly amplify the visual impact of the existing interstate highway intrusion within the historic districts. Construction of tall noise barriers would serve to further isolate historic districts and adjacent structures, and strengthen the perceived and actual separation between neighborhoods on either side of the highway. During the October 29, 2019 consulting parties meeting at Ivy Tech Community College Culinary and Conference Center, several consulting parties noted their opposition to the construction of noise barriers adjacent to historic properties, also expressing concern that some of the city's best gateway scenic views of downtown, its architecture and neighborhoods might be partially or completely blocked to visitors and passing travelers along the I-65/ I-70 North Split.</p>	<p>Observations regarding adverse effects of noise barriers on the historic districts cited are consistent with the recommendations provided in the Traffic Noise Barrier Addendum to Assessment of Effects Report.</p> <p>Preliminary mitigation measures for adverse effects to historic properties, including those from possible noise barriers, are identified in the Section 106 800.11 documentation.</p>
<p>In regards to archaeology, as previously stated, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places ("NRHP") within the proposed project area. However, as was mentioned during the October 29 consulting parties meeting, it is our understanding that an addendum report will be submitted for our review later this year.</p>	<p>The Phase Ia Archaeology Report Addendum was sent to the SHPO for review on November 7, 2019.</p>
<p>If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to DNR-DHPA within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.</p>	<p>If archaeological artifacts are uncovered during project activities, the INDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p>

<p>In terms of mitigation proposals, we believe that the preliminary list shown during the meeting included many good ideas. The Indiana SHPO would be supportive of these proposals and looks forward to further discussion and consultation on means to avoid, minimize and mitigate effects of the undertaking. We are particularly interested in learning the thoughts and ideas of other consulting parties as part of a robust discussion. From our perspective, this is where stakeholder input is most critical in obtaining substantial and meaningful mitigation to offset impacts and benefit historic properties and residents of the affected districts.</p>	<p>Preliminary mitigation measures for adverse effects to historic properties are identified in the Section 106 800.11 documentation. INDOT looks forward to further discussion with the SHPO and consulting parties regarding mitigation measures.</p>
<p>Holy Cross Neighborhood Association – Pat Dubach – November 3, 2019</p>	
<p>Our business has been located on the East Side since 2008, and I have lived on the Near Eastside since 2002. As you know we have experienced many positive steps moving forward as a community. One of the most memorable steps forward was the removal of the Market Street Ramp on Market Street. The removal was a major step in the positive developments which helped connect our community with downtown Indianapolis. Collaborating with Keep Indianapolis Beautiful, Holy Cross Community installed trees along the interstate to help soften our western gateway connection to downtown. Over the years, the Holy Cross Community has helped maintain our gateway and the trees have helped soften the interstate presence.</p> <p>Now, to see the wall being proposed to be added as a "sound barrier" is a huge disappointment. Our biggest sound concern is from CSX, not the interstate. In addition to the sound barriers, it looks like we will still have a steep grade building up to the interstate. Currently, we can only maintain the flat surface, and the state mows down the steep grade every two years. Sure seems the design could have maintenance in mind. Why not put the budget to landscaping rather than wasting it in a useless sound barrier that is not wanted and very ugly. This makes the Market Street Ramp look good.</p> <p>I would also like to understand why our trees have to be removed.</p>	<p>See the response to “Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019” and “Interstate Business Group – Paul Knapp – October 18, 2019” for additional information about INDOT’s Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.</p> <p>Trees may require removal for access during construction. Tree planting not required by Section 106 mitigation may occur in areas where trees were removed. INDOT is determining possible tree planting areas as part of the Context Sensitive Solutions (CSS) process.</p>
<p>HUNI – Garry Chilluffo – November 7, 2019</p>	
<p>Historic Urban Neighborhoods of Indianapolis (HUNI) is a coalition of over 25 historic neighborhoods whose mission is to support the preservation, revitalization and interests of Indianapolis’ urban historic neighborhoods. For the nearly 40 years that we have been in existence, there has progressively been significant revitalization of our neighborhoods, many of which were originally devastated with the construction of the interstates through downtown. As you know, the North Split project goes through 8 of our neighborhoods. We think that we can all</p>	<p>INDOT’s Traffic Noise Analysis Procedure, as consistently applied on all federally funded projects in Indiana, requests input specifically from benefitted receivers. Input from the Historic Urban Neighborhoods of Indianapolis (HUNI) is still important as general project input, which is always welcomed by INDOT.</p> <p>See the response to “Keep Indianapolis Beautiful, Inc. – Joe Jarzen – October 17, 2019” and “Interstate Business Group – Paul Knapp – October 18, 2019” for additional information</p>

<p>agree that this is an opportunity to rectify some of that earlier devastation by the reconstruction of I-65/70 in a way that focuses on reconnecting these neighborhoods in a positive way.</p> <p>Recently, INDOT sent out surveys to those people who live and/or own property within 500 feet of designated areas along the interstates to determine whether the rebuilding of the roadbeds would include tall sound barriers. While reduction of noise is paramount with the reconstruction, HUNI opposes such barriers. We strongly support finding other ways to reduce the noise.</p> <p>These sound barriers put us right back to walling in the core of downtown, one of the main reasons HUNI joined the Rethink Coalition. The walls are aesthetically boring, at best, and provide only a modest improvement on noise reduction (5-7 dB). We appreciate INDOT's plan to use new age paving which will dampen the noise considerably. We also encourage seeking ways to reduce the speed and loud truck breaking. Additionally, we are strongly recommending an urban forest of trees. Reduction in sound by trees is debatable, but it certainly creates a more acceptable visual barrier and contributes to carbon reduction and reduces run off over burdening the sewer system.</p>	<p>about INDOT's Traffic Noise Analysis Procedure and installation of trees in INDOT right-of-way as part of the project.</p>
<p>Indianapolis Historic Preservation Commission – Meg Purnsley – November 8, 2019</p>	
<p>I have reviewed the above referenced submission dated and received on October 11, 2019. Thank you for the update memo #6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report. Per your findings, the following National Register Historic Districts and sites are adversely affected by the proposed undertaking:</p> <ul style="list-style-type: none"> - Old Northside Historic District and the Morris Butler House - St. Joseph Historic District - Chatham-Arch Historic District - Massachusetts Avenue Commercial Historic District - Lockerbie Square Historic District (if NB7 is constructed) <p>When an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association, an Adverse Effect must be found.</p> <p>Excluded from the list are the following historic areas locally protected by the Indianapolis Historic Preservation Commission per state statute I.C. 36-7-11.1 that are also</p>	<p>For clarification, the Massachusetts Avenue Commercial Historic District Section 106 finding is No Adverse Effect, unless Noise Barrier 7 (NB7) is constructed, similar to the Lockerbie Square Historic District. If NB7 is constructed, there would be an Adverse Effect to the Massachusetts Avenue Commercial Historic District.</p> <p>For purposes of Section 106, historic properties are defined as those which are listed in or eligible for the National Register of Historic Places. Properties listed in or eligible for the National Register of Historic Places within the North Split Area of Potential Effects were documented in a Historic Property Report submitted for consulting party review on January 8, 2018. An Addendum to the Historic Property Report based on possible temporary heavy truck traffic during construction was sent for consulting party review on September 28, 2018. No comments on historic properties or boundaries were received.</p> <p>In some situations, a resource may also be locally designated by the Indianapolis Historic Preservation Commission. However, local designation does not qualify a property for Section 106 review. In addition, the boundaries of locally designated historic districts are often drawn using different criteria than those which are used for the boundaries of National Register of Historic Places districts.</p>

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

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

<p><i>And R188, R189, R190, and R193 all have two receptors despite being single family homes. ONS would need 43 benefitted receptors to make it economically feasible.</i></p> <p><i>Also, for a duplex, how does the sound model work for the north side of the duplex? Does the model evaluate them like they are two separate buildings, or does it just evaluate the structure as a whole? It seems their sound would be blocked by the south side of the building, similar to how some homes are not benefitted receptors because their sound is blocked by an adjacent home. I ask because there are several duplexes on the east side of New Jersey that each get two receptors.</i></p>	<p><i>The cost effective calculation was based on individual dwelling units with an area of frequent outdoor human use (such as a balcony, patio or yard.). Ownership of the property was not considered in the cost effective calculation.</i></p> <p><i>4. For purposes of the cost analysis: If an apartment building has 8 units, does that equate to 8 benefitted properties that the cost is divided between?</i> <i>If an apartment building has 8 units, and all units have an area of frequent outdoor human use, then all 8 units are considered in the cost effective calculation.</i></p> <p><i>5. Or does that equate to 16 benefitted properties (including the owner's tallies)? Or does the owner of the apartment building not count for purposes of the cost analysis?</i> <i>The ownership of the properties does not factor in to the cost effective calculation. If all 8 units were benefitted and not owner occupied then 16 surveys would be sent out to solicit input. Two surveys per unit, one to the tenant and one to the owner.</i></p> <p><i>6. Also, why do some single family homes get 2 receptors? For instance, R159 and R160 each get two receptors, but these are just single family homes with no tenants. Some receivers represent multiple receptors. This was done where dwelling units were close geographically and were able to be represented by a single dwelling unit. R160 represents 1232 N Park Ave and 1224 N Park Ave. R159 was identified as a 2 unit dwelling in the report. This is an error in the report and will be corrected.</i></p> <p><i>7. And R188, R189, R190, and R193 all have two receptors despite being single family homes. ONS would need 43 benefitted receptors to make it economically feasible. Receivers R188, R189, and R193 each represent 2 homes, specific addresses listed below. R190 will be revised to only represent 1221 Alabama Street in the final report. This revision will not affect the overall cost effectiveness of the barrier.</i></p> <p><i>R188-2-1205 and 1211 Alabama Street R189-2-1213 and 1219 Alabama Street R190-2-1221 Alabama Street R193-2- 1231 and 1235 Alabama Street</i></p> <p><i>8. Also, for a duplex, how does the sound model work for the north side of the duplex? Does the model evaluate them like they are two separate buildings, or does it just evaluate the structure as a whole? It seems their sound would be blocked by the south side of the building, similar to how some homes are not benefitted receptors because their sound is blocked by an adjacent home. I ask because there are several duplexes on the east side of New Jersey that each get two receptors.</i></p>
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	<p><i>The model predicts noise levels at areas of frequent outdoor use, which is where the receiver is placed. The model evaluates the structure as a whole. The areas of outdoor use at the receivers you are referencing are in the backyard of these residences and there would be no noise reduction from the southern unit on the area of frequent use for the northern unit.</i></p>
<p>Indiana Department of Natural Resources – Chad Slider – December 9, 2019</p>	
<p>Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108); implementing regulations at 36 C.F.R. Part 800, and the “Programmatic Agreement (PA) Among the Federal Highway Administration, the Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana” (“Indiana Minor Projects PA”); and also pursuant to Indiana Code 14-21-1-18 and 312 Indiana Administrative Code (“IAC” 20-4, the staff of the Indiana State Historic Preservation Officer and of the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology, has reviewed the above-referenced archaeological report, which was submitted under your November 7, 2019, Review Request Submittal Form, and Anu Kumar’s (INDOT) November 7, 2019, cover letter; all of which we received on November 8, 2019.</p> <p>Based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (“NRHP”) within the additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas.</p> <p>Additionally, based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (“NRHP”) within the additional portions of the proposed area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were not subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas. However, this identification is</p>	<p>Thank you for your review and concurrence.</p>

<p>subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature. If archaeological deposits are encountered from the post-contact period, they will be evaluated regarding their eligibility for the NRHP in consultation with the staff of the Indiana SHPO. Please contact our office if such deposits are encountered. The archaeological recording must be done in accordance with the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716) and a report of the archaeological documentation must be submitted to our office for review and comment.</p>	
<p>Furthermore, in regard to archaeological resources within the additional portions of the proposed project area described in the archaeological report as Area 8, it is our understanding that measurements of elements (i.e., the lengths of rail ties) of archaeological features at Site 12-Ma-1062 (an abandoned rail bed containing, in situ, rail ties, rails, baseplates, and spikes; and portions of which lie within the Old Northside Historic District [NR-0716]) differ from those of known, similar features and/or from historically documented examples. Because of this, the archaeological report must be revised to include historically documented measurements of such elements, as well as detailed recordation (e.g, scaled drawings) and description of these features. Additionally, if the entirety of the documentation relating to measurements of such features is to be found in a personal communication recorded during current archaeological investigations, then a fuller explanation of the differences will be appropriate. Furthermore, a more detailed discussion of the differences between elements of "high speed" switching and "slow speed" switching should be included, as well as, if possible, a clearer interpretation and discussion of such features at Site 12-Ma-1062.</p> <p>Once the indicated information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.</p>	<p>The Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey Report was revised to include the requested information and hand delivered to the Indiana SHPO on December 13, 2019.</p>
<p>If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to DNR-DHPA within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R- Part 800.</p>	<p>If archaeological artifacts are uncovered during project activities, the INDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p>
<p>Indiana Department of Natural Resources – Chad Slider – December 10, 2019</p>	
<p>Pursuant to Section 106 of the National Historic</p>	<p>Thank you for your review and concurrence. No other</p>

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

<p>archaeological report, which was submitted along with your December 13, 2019, Review Request Submittal Form, all of which we received on December 13, 2019.</p> <p>As previously indicated, based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places ("NRHP") within the additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas.</p> <p>Additionally, as previously indicated, based on the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places ("NRHP") within the additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, that were not subjected to archaeological investigations. We concur with the opinion of the archaeologist, as expressed in the archaeology report, that no further archaeological investigations appear necessary in those areas. However, this identification is subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature. If archaeological deposits are encountered from the post-contact period, they will be evaluated regarding their eligibility for the NRHP in consultation with the staff of the Indiana SHPO. Please contact our office if such deposits are encountered. The archaeological recording must be done in accordance with the Secretary of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716) and a report of the archaeological documentation must be submitted to our office for review and comment.</p>	
<p>Furthermore, based on the submitted information and the documentation available to the staff of the Indiana SHPO, there is insufficient information regarding archaeological site 12-Ma-1062 (an abandoned rail bed containing, in situ, rail ties, rails, baseplates, and spikes; and portions of which lie within the Old Northside Historic District [NR-0716]) to determine whether it is eligible for inclusion in the NRHP. However, we concur with the opinion of the archaeologist, as expressed in the archaeological report, that the portions of archaeological site 12-Ma-1062 that lie within Area 8 of the proposed project area do not appear</p>	<p>Thank you for your review and concurrence. The portions of site 12-Ma-1062 that lie outside the proposed project area will be clearly marked so that they are avoided by all ground-disturbing project activities.</p>

<p>to warrant additional archaeological investigations. However, the portions of archaeological site 12-Ma-1062 that lie outside the proposed project area should be clearly marked so that they are avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the DHP A for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archeology and Historic Preservation" (48 F.R. 44716).</p> <p>Thank you for submitting the archaeological site survey record form for archaeological site 12-Ma-1062 to the Indiana DHPA SHAARD system database. It will be reviewed.</p>	
<p>If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to DNR-DHPA within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.</p>	<p>If archaeological artifacts are uncovered during project activities, the INDNR-DHPA will be notified in accordance with all state laws. All applicable state and federal regulations will be followed.</p>

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Cc: [Runfa Shi \(rshi@indot.IN.gov\)](#); [Laura Hilden \(lhilden@indot.IN.gov\)](#); [Anuradha Kumar \(akumar@indot.IN.gov\)](#); [Carpenter, Patrick A](#); ["Ross, Anthony"](#); [Shaun Miller \(smiller@indot.IN.gov\)](#); [Leah Konicki](#); [Michelle Allen \(michelle.allen@dot.gov\)](#)
Subject: FHWA Project: Des. Nos. 1592385 & 1600808; I-65/I-70 North Split Interchange Reconstruction Project, Indianapolis, Marion County
Date: Thursday, December 19, 2019 2:46:00 PM
Attachments: [North Split_Des 1592385 & 1600808_Update Memo #8_20191219.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Des. Nos.: 1592385 & 1600808
Project Description: I-65/I-70 North Split Interchange Reconstruction Project
Location: I-65/I-70 North Split Interchange south along I-65/I-70 to the Washington Street partial interchange in downtown Indianapolis; including the portion of I-65 west of the North Split interchange to Meridian Street and the portion of I-70 east of the North Split interchange to approximately the bridge over Valley Avenue

Dear North Split Consulting Parties,

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, Indianapolis, Marion County (Des. Numbers (Nos.) 1592385 & 1600808). The Section 106 Early Coordination Letter for this project was originally distributed on September 19, 2017.

As part of Section 106 of the National Historic Preservation Act, a Section 106 Update Memo #8 and the Section 106 800.11(e) documentation have been prepared and are ready for review and comment by consulting parties. The memo is attached for your convenience.

Please review this documentation located in IN SCOPE at (the Des. No. is the most efficient search term, once in IN SCOPE), and respond with any comments that you may have. If a hard copy of the materials is needed, please respond to this email with your request within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. 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.

Thank you in advance for your input,

From: [Miller, Shaun \(INDOT\)](#)
To: ["dhunter@miamination.com"](mailto:dhunter@miamination.com)
Cc: [Kia Gillette](#); [Ross, Anthony](#); [Carpenter, Patrick A](#)
Subject: FW: FHWA Project: Des. Nos. 1592385 & 1600808; I-65/I-70 North Split Interchange Reconstruction Project, Indianapolis, Marion County
Date: Thursday, December 19, 2019 2:52:19 PM
Attachments: [North Split Des 1592385 & 1600808 Update Memo #8 20191219.pdf](#)

Des. Nos.: 1592385 & 1600808
Project Description: I-65/I-70 North Split Interchange Reconstruction Project
Location: I-65/I-70 North Split Interchange south along I-65/I-70 to the Washington Street partial interchange in downtown Indianapolis; including the portion of I-65 west of the North Split interchange to Meridian Street and the portion of I-70 east of the North Split interchange to approximately the bridge over Valley Avenue

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Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. 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.

Thank you in advance for your input,

Shaun Miller
INDOT, Cultural Resources Office
Archaeology Team Lead
(317)233-6795

**FEDERAL HIGHWAY ADMINISTRATION
DOCUMENTATION OF SECTION 106 FINDINGS AND DETERMINATIONS
I-65/I-70 NORTH SPLIT INTERCHANGE RECONSTRUCTION PROJECT
INDIANAPOLIS, MARION COUNTY, INDIANA
DES. NOS.: 1592385 AND 1600808**

By

Leah J. Konicki and Douglas Terpstra, MS

**Submitted By:
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9376 Castlegate Drive
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317.915.9300**

**Submitted To:
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Leah J. Konicki, Principal Investigator

Lead Agency: Federal Highway Administration

December 18, 2019



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Appendix M:	Correspondence to or from consulting parties for the period October 11, 2019 through November 11, 2019, related to Update Memo No. 6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report
Appendix N:	Correspondence to or from the consulting parties for the period November 7, 2019 through December 17, 2019, related to Update Memo No. 7

LIST OF ABBREVIATIONS

General

ADA	Americans with Disabilities Act
APE	Area of Potential Effects
C-D	Collector-Distributor
CFR	Code of Federal Regulations
CSS	Context Sensitive Solutions
db(A)	Decibel
DHPA	Division of Historic Preservation and Archaeology
EA	Environmental Assessment
FHWA	Federal Highway Administration
FHWA-IN	Federal Highway Administration-Indiana Division
HPR	Historic Property Report
IDNR	Indiana Department of Natural Resources
IHSSI	Indiana Historic Sites and Structures Inventory
INDOT	Indiana Department of Transportation
IRHSS	Indiana Register of Historic Sites and Structures
ITS	Intelligent Transportation Systems
MOA	Memorandum of Agreement
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
NTHP	National Trust for Historic Preservation
SHPO	State Historic Preservation Officer

Consulting Parties

ACHP	Advisory Council on Historic Preservation
AIA	American Institute of Architects
BHPS	Benjamin Harrison Presidential Site
CANA	Chatham-Arch Neighborhood Association
CHNA	Cottage Home Neighborhood Association
DMD	Department of Metropolitan Development
DPW	Department of Public Works
FPNA	Fletcher Place Neighborhood Association
FSNA	Fountain Square Neighborhood Association
HCNA	Holy Cross Neighborhood Association
HUNI	Historic Urban Neighborhoods of Indianapolis
IBG	Interstate Business Group
IHPC	Indianapolis Historic Preservation Commission
IMPO	Indianapolis Metropolitan Planning Organization
KIB	Keep Indianapolis Beautiful, Inc.
LSPC	Lockerbie Square People's Club
MAMA	Massachusetts Avenue Merchants Association
NESCO	Near Eastside Community Organization
NPS	National Park Service
NSNA	North Square Neighborhood Association
NTHP	National Trust for Historic Preservation
ONS	Old Northside Neighborhood Association
SJHNA	Saint Joseph Historic Neighborhood Association
WPNA	Windsor Park Neighborhood Association

**FEDERAL HIGHWAY ADMINISTRATION'S
SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties) AND
SECTION 106 FINDINGS AND DETERMINATIONS
AREA OF POTENTIAL EFFECT
ELIGIBILITY DETERMINATIONS
EFFECT FINDING
I-65/I-70 North Split Interchange Reconstruction Project
Indianapolis, Marion County, Indiana
DES. NOS.: 1592385 and 1600808**

**AREA OF POTENTIAL EFFECTS
(Pursuant to 36 CFR Section 800.4(a)(1))**

The original Area of Potential Effects (APE) for the I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) (North Split Project) for Section 106 started as a 0.25-mile buffer around the entire project area, which was increased to a 0.5-mile buffer around the existing North Split interchange. Subsequent to the completion of the Historic Property Report (HPR), an expanded APE was developed to take into account anticipated temporary truck traffic increases on city streets during construction of the North Split Project. The segments listed below are included in the proposed expansion of the APE (See Appendix A: Figure 1 for a map of the APE).

- Fall Creek Parkway Segment, from 38th Street south to College Avenue
- College Avenue Segment, from Fall Creek Parkway south to original APE
- West Street Segment, from the I-65 interchange south to the I-70 interchange
- Missouri Street Segment, from West Street south to the I-70 interchange
- Pennsylvania Street Segment, south from original APE to Madison Avenue
- Madison Avenue Segment, from Pennsylvania Street to I-70 interchange
- St. Clair Street Segment, from original APE west to West Street
- Fort Wayne Avenue Segment, from original APE south to St. Clair Street
- East Street Segment, from original APE south to original APE
- Washington Street Segment, from Rural Street west to original APE
- Rural Street Segment, from the I-70 interchange south to Washington Street
- Massachusetts Avenue Segment, from original APE east to Rural Street

**ELIGIBILITY DETERMINATIONS
(Pursuant to 36 CFR 800.4(c)(2))**

There are a total of 51 historic resources listed in or eligible for the National Register of Historic Places (NRHP) in the APE. Of these, 37 historic resources are listed in the NRHP, 2 are National Historic Landmarks (NHLs), and 12 have been determined eligible for the NRHP through the Section 106 consultation for this undertaking.

Table 1 is a complete list of historic properties in the APE, including information on the property name, address, listing criteria, date of listing, and a brief description.

Table 1. Historic Properties in the Area of Potential Effects

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
NHRP-listed Historic Resources				
NR-0438	Herron-Morton Place Historic District	A and C	Late nineteenth- and early twentieth-century residential architecture	1983
NR-0157 and NR-0716	Old Northside Historic District	A and C	Residential and ecclesiastical architecture from the late nineteenth and early twentieth centuries	1978
NR-0926	Saint Joseph Neighborhood Historic District	A and C	Residential, commercial, and industrial resources reflecting the city's development during the late nineteenth and early twentieth centuries	1991
NR-0327	Chatham-Arch Historic District	A and C	Mixed-use neighborhood containing residential, commercial, and industrial resources	1980
NR-0525	Massachusetts Avenue Commercial Historic District	A and C	Architecturally important secondary retail district and service center for the adjoining residential areas	1982
NR-0853 and NR-2030	Lockerbie Square Historic District	A and C	Largely residential area with a wide range of architectural styles from before the Civil War to the early twentieth century	1973 and 1987
NR-0355	Fletcher Place Historic District	A and C	Collection of buildings from early settlement of the city's south side, including area's most prestigious residential neighborhood, modest housing, and a commercial corridor	1982
NR-0965	Cottage Home Historic District	C	Collection of late nineteenth-century workers' cottages and a grouping of buildings designed by the leading Indianapolis architectural firm of Vonnegut and Bohn	1990
NR-0084	Arsenal Technical High School Historic District	A and C	Significant for its association with Indiana's military history, for its association with Indianapolis' educational history, and for its architecture	1976
NR-1711	Indianapolis Park and Boulevard System Historic District	A and C	Significant for its association with early twentieth-century trend to regulate growth in cities and as a work of George Edward Kessler, a master in landscape architecture	2003
NR-2410/IHSSI #098-296-01173	Indianapolis Public Library Branch No. 6 1801 Nowland Avenue	A and C	Two-story Carnegie library built in 1911–1912 with elements of the Italian Renaissance Revival and Craftsman styles	2016
NR-0090/IHSSI #098-296-01219	Prosser House 1454 E. 10 th Street	C	One-and-one-half-story cross-plan house built in 1886	1975

Table 1. Historic Properties in the Area of Potential Effects

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
NR-0146/IHSSI #098-296-01375	Bals-Wocher House 951 N. Delaware Street	C	Significant example of an Italianate style house, built in 1870	1979
NR-0616.33/IHSSI #098-296-01367	Wyndham 1040 N. Delaware Street	A and C	Seven-story Tudor Revival-style apartment building built 1929	1983
NR-0203/IHSSI #098-296-01368	Pierson-Griffiths House 1028 N. Delaware Street	C	Built 1895, noted for its elaborate Victorian-era Second Empire and Greek Revival ornamental detailing	1978
NR-0694/IHSSI #098-296-01369	Calvin I. Fletcher House 1031 N. Pennsylvania Street	B and C	Queen Anne-style house built in 1895	1983
NR-0616.26/IHSSI #098-296-01379	Pennsylvania Apartments 919 N. Pennsylvania Street	A and C	Built in 1906	1983
NR-0616.25/IHSSI #098-296-01389	The Myrtle Fern 221 E. 9 th Street	A and C	Two-story apartment building built in 1925	1983
NR-0616.23/IHSSI #098-296-01390	The Shelton 825 N. Delaware Street	A and C	Five-story apartment building built in 1925	1983
NR-0616.09/IHSSI #098-296-01391	Cathcart Apartments 103 E. 9 th Street	A and C	Craftsman-style apartment building built in 1909	1983
NR-0616.19/IHSSI #098-296-01392	Lodge Apartments 829 N. Pennsylvania Street	A and C	Georgian Revival three-story apartment building built in 1905	1983
NR-0616.27/IHSSI #098-296-01393	Plaza Apartments 902 N. Pennsylvania Street	A and C	Renaissance Revival-style U-shaped building built in 1907	1983
NR-0616.03/IHSSI #098-296-01394	The Ambassador 39 E. 9 th Street	A and C	Six-story building with elements of the Sullivanesque style, built in 1923	1983
NR-0085/IHSSI #098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St. Clair Street	C	Example of Beaux Arts style, designed by architect Paul Phillipe Cret, built 1913–1916	1975
NR-0616.08/IHSSI #098-296-01396	The Burton 821–823 N. Pennsylvania Street	A and C	Spanish Colonial Revival two-story building built ca. 1920	1983
NR-0725/IHSSI #098-296-01415	The Vera and The Olga 1440–1446 N. Illinois Street	C	Significant as one of the few examples of rowhouse construction	1984
NR-0641/IHSSI #098-296-01428	Independent Turnverein 902 N. Meridian Street	A and C	Built 1913–1914, building combines elements of the Prairie, Craftsman, and Renaissance Revival styles	1983
NR-0332/IHSSI #098-296-01651	Cole Motor Car Company 730 E. Washington Street	A	Significant for its association with a leading manufacturer of automobiles in the early twentieth century; built 1911–1913 of reinforced concrete	1983
NR-2266	Gaseteria, Inc. 1031 E. Washington Street	B and C	One-story Art Moderne office building built in 1941	2013
NR-1406	Manchester Apartments 960–962 N. Pennsylvania Street	C	Tudor Revival-style three-story mixed-use building built in 1929, designed by Henry Fitton	1998

Table 1. Historic Properties in the Area of Potential Effects

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
NR-1373	Sheffield Inn 956–958 N. Pennsylvania Street	C	Two-story Tudor Revival-style mixed-use building was designed by Henry Fitton and built in 1926–1927	1998
NR-0616.11/IHSSI #098-296-01370	Delaware Court 1005 N. Delaware Street	A and C	Tudor Revival-style apartment building, built 1917	1983
NR-0616.28/IHSSI #098-296-01385	The Spink (Renaissance Tower Historic Inn) 230 E. 9 th Street	A and C	Six-story Jacobethan Revival building, constructed ca. 1922; early high-rise apartment building	1983
NR-0897/IHSSI #098-296-01353	William Buschman Block 968–972 Fort Wayne Avenue	B and C	Italianate-style commercial building, built ca. 1879 by William Buschman	1988
NR-2027/IHSSI #098-296-14219	Morris-Butler House 1204 E. 12 th Street	C	Significant example of the Second Empire-style residence, built 1864	1973
NR-2043/IHSSI #098-296-14063	John W. Schmidt House (The Propylaeum) 1410 N. Delaware Street	A and C	Tudor Revival residence, built 1889–1891 for John W. Smith, president of the Indianapolis Brewing Company	1973
NR-0695/IHSSI #098-296-01373	Pearson Terrace 928–940 N. Alabama Street	A and C	Two-story Jacobethan Revival building was constructed ca. 1901–1902 by George C. Pearson	1984
National Historic Landmarks (NHL)				
NR-2066/IHSSI #098-296-14057	Benjamin Harrison Home/Presidential Site 1230 N. Delaware Street	A, B, and C	Two-and-one-half-story Italianate residence, built 1874–1875, and significant for its association with President Benjamin Harrison	1964
NR-2067/IHSSI #098-296-20038	James Whitcomb Riley House 528 Lockerbie Street	A and B	Two-story Italianate residence, built 1872; significant for its association with James Whitcomb Riley	1966
NRHP-Eligible Historic Resources				
NBI No. 4900233/HB-2611	Marion County Bridge No. 2520L N. Oriental Street over Pogue's Run	C	Continuous reinforced concrete slab bridge with a horizontal curved deck representing an important bridge construction technique	N/A
N/A	Martin Luther King, Jr. Park 1702 Broadway Street	A and B	Significant for its association with Senator Robert F. Kennedy and his speech on April 4, 1968, following the assassination of Martin Luther King, Jr.	N/A
NR-1560/IHSSI #098-296-01309	School #27–Charity Dye Elementary School 545 E. 17 th Street	A and C	Two-story central section of the building was constructed in ca. 1882 in the Italianate style	2000
IHSSI #098-296-01212	John Hope School No. 26 1301 E. 16 th Street	C	Three-story U-shaped building designed by architect Elmer E. Dunlap in the Neoclassical style, completed in 1921.	N/A

Table 1. Historic Properties in the Area of Potential Effects

NR/HB/ IHSSI No.	Name and Address of Resource	Criteria	Description	Date of Listing
IHSSI #098-296-01220	James E. Roberts School No. 97 1401 E. 10 th Street	A and C	The school, with elements of Art Moderne and Art Deco, constructed in 1936 as a public school for disabled students	in NRHP boundary of Arsenal Technical H.S. H.D.
IHSSI #098-296-01378	Knights of Pythias 941 N. Meridian Street	C	Built 1925 in Gothic Revival-style with terra cotta façade	N/A
IHSSI #098-296-01421	Fame Laundry 1352 N. Illinois Street	C	Two-story commercial building built in 1929 and faced in terra cotta	N/A
IHSSI #098-296-01426	Stutz Motor Car Company 1002–1008 N. Capital Avenue	A and C	Four-story Commercial-style industrial building significant for its association with automobile industry in Indianapolis; built beginning in 1914	N/A
N/A	St. Rita's Catholic Church Parish Complex 1733 Dr. Andrew J. Brown Avenue	A and C; criteria consideration A	Mid-Century Modern parish complex, built 1958, designed by Charles Brown and associated with African American history and Civil Rights movement	N/A
N/A	Saints Peter and Paul Cathedral Parish Historic District	A and C	Catholic Church complex with Neoclassical and Italian Renaissance Revival buildings built between 1891 and 1926	N/A
N/A	Windsor Park Neighborhood Historic District	A and C	Late nineteenth- to early twentieth-century streetcar suburb with one- to two-story buildings	N/A
NR-0653	Holy Cross/Westminster Historic District	A and C	Significant as Indianapolis' largest intact inner-city neighborhood and German and Irish immigrants, and for its extensive collection of architectural styles.	1984

EFFECT FINDINGS

Table 2 lists each property and its effect finding.

Table 2. Effect Finding

NRHP No./HB No./IHSSI No.	Name and Address of Resource	Effect Finding
No Effect		
NR-2410/IHSSI #098-296-01173	Indianapolis Public Library Branch No. 6 1801 Nowland Avenue	No Effect
NR-0090/IHSSI #098-296-01219	Prosser House 1454 E. 10 th Street	No Effect
NR-0146/IHSSI #098-296-01375	Bals-Wocher House 951 N. Delaware Street	No Effect
NR-0616.26/IHSSI #098-296-01379	Pennsylvania Apartments 919 N. Pennsylvania Street	No Effect
NR-0616.25/IHSSI #098-296-01389	The Myrtle Fern 221 E. 9 th Street	No Effect
NR-0616.09/IHSSI #098-296-01391	Cathcart Apartments 103 E. 9 th Street	No Effect
NR-0616.19/IHSSI #098-296-01392	Lodge Apartments 829 N. Pennsylvania Street	No Effect
NR-0616.27/IHSSI #098-296-01393	Plaza Apartments 902 N. Pennsylvania Street	No Effect
NR-0085/IHSSI #098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St. Clair Street	No Effect
NR-0616.08/IHSSI #098-296-01396	The Burton 821–823 N. Pennsylvania Street	No Effect
NR-0725/IHSSI #098-296-01415	The Vera and The Olga 1440–1446 N. Illinois Street	No Effect
NR-0641/IHSSI #098-296-01428	Independent Turnverein 902 N. Meridian Street	No Effect
NR-2043/IHSSI #098-296-14063	John W. Schmidt House (The Propylaeum) 1410 N. Delaware Street	No Effect
NR-1560/IHSSI #098-296-01309	School #27–Charity Dye Elementary School 545 E. 17 th Street	No Effect
NR-2067/IHSSI #098-296-20038	James Whitcomb Riley House 528 Lockerbie Street	No Effect
NBI No. 4900233/HB-2611	Marion County Bridge No. 2520L N. Oriental Street over Pogue’s Run	No Effect
IHSSI #098-296-01220	James E. Roberts School No. 97 1401 E. 10 th Street	No Effect
IHSSI #098-296-01378	Knights of Pythias 941 N. Meridian Street	No Effect
IHSSI #098-296-01421	Fame Laundry 1352 N. Illinois Street	No Effect
IHSSI #098-296-01426	Stutz Motor Car Company 1002–1008 N. Capital Avenue	No Effect

Table 2. Effect Finding

NRHP No./HB No./ IHSSI No.	Name and Address of Resource	Effect Finding
N/A	Martin Luther King, Jr. Park 1702 Broadway Street	No Effect
N/A	St. Rita's Catholic Church Parish Complex 1733 Dr. Andrew J. Brown Avenue	No Effect
No Adverse Effect		
NR-0438	Herron-Morton Place Historic District	No Adverse Effect
NR-0355	Fletcher Place Historic District	No Adverse Effect
NR-0965	Cottage Home Historic District	No Adverse Effect
NR-0084	Arsenal Technical High School Historic District	No Adverse Effect
NR-1711	Indianapolis Park and Boulevard System Historic District	No Adverse Effect
NR-0616.33/IHSSI #098-296-01367	Wyndham 1040 N. Delaware Street	No Adverse Effect
NR-0203/IHSSI #098-296-01368	Pierson-Griffiths House 1028 N. Delaware Street	No Adverse Effect
NR-0694/IHSSI #098-296-01369	Calvin I. Fletcher House 1031 N. Pennsylvania Street	No Adverse Effect
NR-0616.03/IHSSI #098-296-01394	The Ambassador 39 E. 9 th Street	No Adverse Effect
NR-0616.23/IHSSI #098-296-01390	The Shelton 825 N. Delaware Street	No Adverse Effect
NR-0332/IHSSI #098-296-01651	Cole Motor Car Company 730 E. Washington Street	No Adverse Effect
NR-2266	Gaseteria, Inc. 1031 E. Washington Street	No Adverse Effect
NR-1406	Manchester Apartments 960–962 N. Pennsylvania Street	No Adverse Effect
NR-1373	Sheffield Inn 956–958 N. Pennsylvania Street	No Adverse Effect
NR-0616.11/IHSSI #098-296-01370	Delaware Court 1005 N. Delaware Street	No Adverse Effect
NR-0616.28/IHSSI #098-296-01385	The Spink (Renaissance Tower Historic Inn) 230 E. 9 th Street	No Adverse Effect
NR-0897/IHSSI #098-296-01353	William Buschman Block 968–972 Fort Wayne Avenue	No Adverse Effect
NR-0695/IHSSI #098-296-01373	Pearson Terrace 928–940 N. Alabama Street	No Adverse Effect
NR-0653	Holy Cross/Westminster Historic District	No Adverse Effect
NR-2066/IHSSI #098-296-14057	Benjamin Harrison Home/Presidential Site 1230 N. Delaware Street	No Adverse Effect
IHSSI #098-296-01212	John Hope School No. 26 1301 E. 16 th Street	No Adverse Effect
N/A	Saints Peter and Paul Cathedral Parish Historic District	No Adverse Effect
N/A	Windsor Park Neighborhood Historic District	No Adverse Effect

Table 2. Effect Finding

NRHP No./HB No./IHSSI No.	Name and Address of Resource	Effect Finding
Adverse Effects		
NR-0157 and NR-0716	Old Northside Historic District	Adverse Effect
NR-0926	Saint Joseph Neighborhood Historic District	Adverse Effect
NR-0327	Chatham-Arch Historic District	Adverse Effect
NR-0525	Massachusetts Avenue Commercial Historic District	Adverse Effect
NR-0853 and NR-2030	Lockerbie Square Historic District	Adverse Effect
NR-2027/IHSSI #098-296-14219	Morris-Butler House 1204 N. 12 th Street	Adverse Effect

The Federal Highway Administration (FHWA) has determined an "Adverse Effect" finding is appropriate for this undertaking. FHWA respectfully requests the Indiana State Historic Preservation Officer provide written concurrence with the Section 106 determination of effect for each property and the project's overall effect finding.

SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties)

This undertaking will not convert property from the resources listed above, which are Section 4(f) historic properties, to a transportation use. In addition, the proximity impacts to adjacent historic properties will not result in substantial impairment to the properties' activities, features, or attributes that qualify the properties for protection under Section 4(f). Therefore, no Section 4(f) evaluation is required for the above-listed historic properties.

Michelle Allen

for Mayela Sosa
Division Administrator
FHWA-IN Division

Dec 19, 2019
Approved Date

**FEDERAL HIGHWAY ADMINISTRATION
DOCUMENTATION OF SECTION 106
FINDING OF ADVERSE EFFECT
SUBMITTED TO THE STATE HISTORIC PRESERVATION OFFICER
PURSUANT TO 36 CFR Section 800.6(a)(3)
I-65/I-70 North Split Interchange Reconstruction Project
Indianapolis, Marion County, Indiana
DES. NOS.: 1592385 and 1600808**

1. DESCRIPTION OF THE UNDERTAKING

The proposed undertaking is the I-65/I-70 North Split Interchange Reconstruction Project (North Split Project), which extends south along I-65/I-70 to Washington Street, west along I-65 to approximately Alabama Street (to Illinois Street along 11th and 12th streets), and east along I-70 to the bridge over Valley Avenue.

Indiana Department of Transportation (INDOT) completed an Alternatives Screening Report for the North Split Project as part of the National Environmental Policy Act (NEPA) process on September 21, 2018. The Alternatives Screening Report identified Alternative 4c as INDOT's preliminary preferred alternative. Alternative 4c, as described in the Alternatives Screening Report, has been refined since that report was published and is now referred to as the refined preliminary preferred alternative. No new right-of-way will be required for the project. The refined preliminary preferred alternative includes the following project elements:

- Reconstruction of the North Split interchange to correct the top four safety concerns, e.g.,
 1. I-65 northbound at Meridian/Pennsylvania Street exit ramp weave, west leg of North Split
 2. I-65 southbound at Meridian/Delaware Street entrance ramp weave, west leg of North Split
 3. I-65 southbound and I-70 westbound merge point on south leg of North Split
 4. I-70 eastbound, abrupt curve from south leg to east leg of North Split
- Replacement or rehabilitation of the bridges throughout the project area; bridge aesthetic treatments to be determined as part of the Context Sensitive Solutions (CSS) process and be based on public input;
- Replacement of the pavement throughout the project area;
- Reconstruction of the Pennsylvania Street exit ramp, which will eliminate I-70 westbound access to this ramp. I-65 northbound traffic will still be able to exit here;
- Reconstruction of the Delaware Street entrance ramp, which will eliminate access to I-65 southbound and the collector-distributor (C-D) road.¹ Traffic entering from the Delaware ramp will still be able to access I-70 eastbound. I-65 southbound traffic will be able to access the C-D road;
- Reconfigure interchange so that northbound I-65 and eastbound I-70 traffic do not have to cross paths between the South Split and the North Split;

¹ The C-D road provides access to North Street, Michigan Street, Vermont Street, New York Street, Ohio Street, and Fletcher Avenue.

- Modify the Pine Street entrance to I-65 northbound to provide a one-lane ramp on the right of I-65, replacing the existing two-lane ramp entering I-65 on the left;
- Construction of retaining walls or vegetated slopes (or a combination of the two) along the interstate sideslopes; the ultimate sideslope treatments will be determined as part of the CSS process and be based on public input and engineering feasibility;
- Landscaping within the existing right-of-way;
- Possible noise impacts and construction of noise barriers (determined in accordance with INDOT's Traffic Noise Analysis Procedure);
- Traffic signal modifications and possible installation of Americans with Disabilities Act (ADA) curb ramps at 12th Street and Pennsylvania Street; 12th Street and Meridian Street; 12th Street and Illinois Street; 11th Street and Delaware Street; 11th Street and Pennsylvania Street; 11th Street and Meridian Street; 11th Street and Illinois Street; I-65/I-70 at Pine Street and Michigan Street; and Ohio Street and College Avenue;
- Possible construction of detention ponds or other drainage treatments;
- Reconstruction of a portion of the Old Northside Trail within the O'Bannon Soccer Park and construction of a temporary walking path within existing INDOT right-of-way to be a temporary detour for the Monon Trail during construction;
- Replacement of light poles and high mast light towers along the interstate;
- Relocation of the Intelligent Transportation Systems (ITS) tower and possible addition of a new tower within the interchange and installation of ITS signage within the project area;
- Replacement of existing signage along the interstates and wayfinding signage along local streets;
- Relocation of overhead power lines and installation of new utility poles;
- Relocation of existing utilities and storm sewers within the existing right-of-way; and
- Installation of fiber optic conduits and access vaults within the existing right-of-way.

Per Federal Highway Administration-Indiana Division (FHWA-IN) Procedures, Federal-aid highway construction projects qualify as "undertakings" as defined in 36 CFR 800.16(y) and are subject to review under Section 106 of the National Historic Preservation Act. Federal-aid funds will be used for planning and construction of the proposed improvements. Section 106 is thus applicable.

The original APE for the I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) (North Split Project) started as a 0.25-mile buffer around the entire project area, which was increased to a 0.5-mile buffer around the existing North Split interchange. Subsequent to the completion of the Historic Property Report (HPR), an expanded APE was developed to take into account anticipated temporary truck traffic increases on city streets during construction of the North Split project. The segments listed below are included in the proposed expansion of the APE (See Appendix A: Figure 1 for a map of the APE).

- Fall Creek Parkway Segment, from 38th Street south to College Avenue
- College Avenue Segment, from Fall Creek Parkway south to original APE
- West Street Segment, from the I-65 interchange south to the I-70 interchange
- Missouri Street Segment, from West Street south to the I-70 interchange

- Pennsylvania Street Segment, south from original APE to Madison Avenue
- Madison Avenue Segment, from Pennsylvania Street to I-70 interchange
- St. Clair Street Segment, from original APE west to West Street
- Fort Wayne Avenue Segment, from original APE south to St. Clair Street
- East Street Segment, from original APE south to original APE
- Washington Street Segment, from Rural Street west to original APE
- Rural Street Segment, from the I-70 interchange south to Washington Street
- Massachusetts Avenue Segment, from original APE east to Rural Street

The area is urban, and includes commercial, institutional, and residential land uses. The building stock was built primarily in the mid-nineteenth century through the present (Appendix B: Photographs 1–51).

2. EFFORTS TO IDENTIFY HISTORIC PROPERTIES

Efforts to identify historic properties in the APE included a check of data available online at the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) and the Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBC Map), a review of the Center Township, Marion County Interim Report, historical/architectural and archaeological fieldwork, and communication with consulting parties. Sources of information examined included the NRHP and NHL listings, Indiana Register of Historic Sites and Structures (IRHSS) listings, the Indiana Historic Bridge Inventory, Indiana Historic Sites and Structures Inventory (IHSSI) listings, archaeological site maps, cultural resources management reports, and cemetery records. Based on the records check, within the APE there are 10 NRHP-listed historic districts; 27 NRHP individually listed resources; 3 IRHSS-listed resources not listed in the NRHP; 1 NRHP-eligible resource; 2 NHLs; and 1 NRHP-eligible bridge. There are no previously identified archaeological sites in the project area.

The results of field surveys were reported in an HPR [Konicki and Terpstra 2017]; an addendum to the HPR (Konicki 2018); a Phase Ib Archaeological Records Check and Reconnaissance Survey Report (Coughlin and Miller 2018); and two Phase Ia Archaeological Records Check and Reconnaissance Survey Reports (Miller and Schwarz 2019 and Luksha and Schwarz 2019). The HPR identified 37 existing NRHP-listed historic resources; 2 NHLs; and 12 resources determined individually eligible through Section 106 consultation for this undertaking. These historic resources are listed on Table 3 below and is shown on Figure 2 in Appendix A.

Table 3. Historic Resources in the APE

NRHP/HB/IHSSI No.	Name and Address of Resource	Date of Listing
NRHP-listed Historic Resources		
NR-0438	Herron-Morton Place Historic District	1983
NR-0157 and NR-0716	Old Northside Historic District	1978
NR-0926	Saint Joseph Neighborhood Historic District	1991
NR-0327	Chatham-Arch Historic District	1980
NR-0525	Massachusetts Avenue Commercial Historic District	1982
NR-0853 and NR-2030	Lockerbie Square Historic District	1973 and 1987
NR-0355	Fletcher Place Historic District	1982
NR-0965	Cottage Home Historic District	1990
NR-0084	Arsenal Technical High School Historic District	1976
NR-1711	Indianapolis Park and Boulevard System Historic District	2003
NR-2410/IHSSI #098-296-01173	Indianapolis Public Library Branch No. 6 1801 Nowland Avenue	2016
NR-0090/ IHSSI #098-296-01219	Prosser House 1454 E. 10 th Street	1975
NR-0146/IHSSI #098-296-01375	Bals-Wocher House 951 N. Delaware Street	1979
NR-0616.33/IHSSI #098-296-01367	Wyndham 1040 N. Delaware Street	1983

Table 3. Historic Resources in the APE

NRHP/HB/IHSSI No.	Name and Address of Resource	Date of Listing
NR-0203/IHSSI #098-296-01368	Pierson-Griffiths House 1028 N. Delaware Street	1978
NR-0694/IHSSI #098-296-01369	Calvin I. Fletcher House 1031 N. Pennsylvania Street	1983
NR-0616.26/IHSSI #098-296-01379	Pennsylvania Apartments 919 N. Pennsylvania Street	1983
NR-0616.25/IHSSI #098-296-01389	The Myrtle Fern 221 E. 9 th Street	1983
NR-0616.23/IHSSI #098-296-01390	The Shelton 825 N. Delaware Street	1983
NR-0616.09/IHSSI #098-296-01391	Cathcart Apartments 103 E. 9 th Street	1983
NR-0616.19/IHSSI #098-296-01392	Lodge Apartments 829 N. Pennsylvania Street	1983
NR-0616.27/IHSSI #098-296-01393	Plaza Apartments 902 N. Pennsylvania Street	1983
NR-0616.03/IHSSI #098-296-01394	The Ambassador 39 E. 9 th Street	1983
NR-0085/IHSSI #098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St. Clair Street	1975
NR-0616.08/IHSSI #098-296-01396	The Burton 821–823 N. Pennsylvania Street	1983
NR-0725/IHSSI #098-296-01415	The Vera and The Olga 1440–1446 N. Illinois Street	1984
NR-0641/IHSSI #098-296-01428	Independent Turnverein 902 N. Meridian Street	1983
NR-0332/IHSSI #098-296-01651	Cole Motor Car Company 730 E. Washington Street	1983
NR-2266	Gaseteria, Inc. 1031 E. Washington Street	2013
NR-1406	Manchester Apartments 960–962 N. Pennsylvania Street	1998
NR-1373	Sheffield Inn 956–958 N. Pennsylvania Street	1998
NR-0616.11/IHSSI #098-296-01370	Delaware Court 1005 N. Delaware Street	1983
NR-0616.28/IHSSI #098-296-01385	The Spink (Renaissance Tower Historic Inn) 230 E. 9 th Street	1983
NR-0897/IHSSI #098-296-01353	William Buschman Block 968–972 Fort Wayne Avenue	1988
NR-2027/IHSSI #098-296-14219	Morris-Butler House 1204 N. 12 th Street	1973
NR-2043/IHSSI #098-296-14063	John W. Schmidt House (The Propylaeum) 1410 N. Delaware Street	1973

Table 3. Historic Resources in the APE

NRHP/HB/IHSSI No.	Name and Address of Resource	Date of Listing
NR-0695/IHSSI #098-296-01373	Pearson Terrace 928–940 N. Alabama Street	1984
National Historic Landmarks (NHL)		
NR-2066/IHSSI #098-296-14057	Benjamin Harrison Home/Presidential Site 1230 N. Delaware Street	1964
NR-2067/IHSSI #098-296-20038	James Whitcomb Riley House 528 Lockerbie Street	1966
NRHP-Eligible Historic Resources		
N/A	Martin Luther King, Jr. Park 1702 Broadway Street	N/A
HB-2611	Marion County Bridge No. 2520L N. Oriental Street over Pogue’s Run	N/A
NR-1560/IHSSI #098-296-01309	School #27–Charity Dye Elementary School 545 E. 17 th Street	N/A
IHSSI #098-296-01212	John Hope School No. 26 1301 E. 16 th Street	N/A
IHSSI #098-296-01220	James E. Roberts School No. 97 1401 E. 10 th Street	N/A
IHSSI #098-296-01378	Knights of Pythias 941 N. Meridian Street	N/A
IHSSI #098-296-01421	Fame Laundry 1352 N. Illinois Street	N/A
IHSSI #098-296-01426	Stutz Motor Car Company 1002–1008 N. Capital Avenue	N/A
N/A	St. Rita’s Catholic Church Parish Complex 1733 Dr. Andrew J. Brown Avenue	N/A
N/A	Saints Peter and Paul Cathedral Parish Historic District	N/A
N/A	Windsor Park Neighborhood Historic District	N/A
NR-0653	Holy Cross/Westminster Historic District	1984

The addendum to the HPR focused on an expanded APE encompassing 12 segments of local roadway that could see a meaningful temporary increase in truck traffic during the construction phase of the project if there is a full closure of the North Split interchange. The survey for the addendum did not identify additional historic properties beyond those in the HPR, but did identify two bridges that contribute to the Indianapolis Park and Boulevard System Historic District that fall within roadway segments and that may be affected by the temporary diversion of truck traffic during construction. The two bridges are: Marion Co. Bridge No. 1803F (NBI No. 4900142; IHSSI No. 098-296-00741) and Marion Co. Bridge No. 2514F (NBI No. 4900226; HB-2609).

The Phase Ib archaeology survey found one site within the project area, which was recommended not eligible for the NRHP; no further work was recommended. The Phase Ia archaeological survey located no archaeological resources within the project area. An additional Phase Ia archaeological survey located one

site within the project area, which was recommended not eligible for the NRHP; no further work was recommended.

Copies of the abstracts and summaries for the HPR, HPR Addendum, Phase Ia archaeology, Phase Ib, and Phase Ia addendum archaeology reports are included in Appendix C.

The State Historic Preservation Officer (SHPO) is entitled to participate in the Section 106 process as a consulting party. The following other individuals and organizations were invited by letter or email dated September 19, 2017, and invited to a consulting parties meeting, held on October 6, 2017 (Appendix E). All invitees were notified of the availability of the consulting parties correspondence on INDOT's IN SCOPE website (<http://erms.indot.in.gov/Section106Documents/>).

- Indiana State Historic Preservation Officer (SHPO)
- U.S. Army Corps of Engineers
- Indiana Landmarks
- National Park Service, Midwest Region (NPS)
- Citizens Neighborhood Coalition
- Indy Chamber
- Historic Urban Neighborhoods of Indianapolis (HUNI)
- Indianapolis Historic Preservation Commission (IHPC)
- Downtown Indy, Inc.
- Herron-Morton Place Association
- Old Northside Neighborhood Association (ONS)
- Old Northside Land Use Committee
- Benjamin Harrison Presidential Site (BHPS)
- St. Joseph Historic Neighborhood Association (SJHNA)
- Chatham-Arch Neighborhood Association (CANA)
- Lockerbie Square People's Club (LSPC)
- James Whitcomb Riley Museum Home
- Windsor Park Neighborhood Association (WPNA)
- Holy Cross Neighborhood Association (HCNA)
- Cottage Home Neighborhood Association (CHNA)
- Massachusetts Avenue Merchants Association (MAMA)
- Arsenal Technical High School
- Indianapolis Department of Metropolitan Development (IDMD)
- Indianapolis Metropolitan Planning Organization (IMPO)
- Office of the Mayor
- Mayor's Neighborhood Advocate, Area 10
- Mayor's Neighborhood Advocate, Area 7
- Mayor's Neighborhood Advocate, Area 8
- Mayor's Neighborhood Advocate, Area 9
- Marion County City-County Council
- Marion County Historian
- Marion County Historical Society

- Hendricks Commercial Properties
- Delaware Nation of Oklahoma
- Eastern Shawnee Tribe of Oklahoma
- Miami Tribe of Oklahoma
- Peoria Tribe of Indians of Oklahoma
- Pokagon Band of Potawatomi

The SHPO responded on October 19, 2017 and stated that they had no additional consulting parties to suggest (Appendix F).

Eight responses to the September 19, 2017 letter and email were received from individuals and organizations accepting or requesting consulting party status. An additional three individuals attended the consulting party meeting on October 6, 2017 and were given consulting party status. All are outlined in the table below (Appendix F).

Organization	Representative	Response Date
Responded to the Invitation to be a Consulting Party		
Miami Tribe of Oklahoma	Diane Hunter	September 21, 2017
Indianapolis Historic Preservation Commission	Christopher Myers (now Meg Purnsley)	September 25, 2017
Indianapolis Department of Metropolitan Development	Meredith Klekotka via Christopher Myers (now Brad Beaubian)	September 25, 2017
Chatham Arch Neighborhood Association	David Pflugh (now Shawn Miller)	October 1, 2017
Holy Cross Neighborhood Association	Kelly Wensing and Pat Dubach	October 5, 2017
NESCO Land Use Committee	David Hittle	October 6, 2017
Requested Consulting Party Status		
Benjamin Harrison Presidential Site	Charles A. Hyde	Attended October 6, 2017 meeting*
Holy Cross Neighborhood	Jason Rowley	Attended October 6, 2017 meeting*
Cottage Home BOD	Jim Jessee	Attended October 6, 2017 meeting*
Old Northside Homeowners Association	Travis Barnes	October 10, 2017
Windsor Park Neighborhood Association	Jen Eamon	October 26, 2017

*Attendees to the October 6, 2017 Consulting Parties Meeting #1 were given consulting party status if they otherwise had not responded.

On October 26, 2017, an email was sent to all consulting party invitees forwarding minutes and presentation from the October 6, 2017, consulting party meeting (Appendix F). The email went on to advise invitees that if they had not responded to the previous email and/or had not attended the October

6, 2017 consulting party meeting, they would no longer receive Section 106 consultation information for the project. Recipients were advised that, if they would like to be a consulting party for historic resources, they could respond to the email requesting consulting party status (Appendix F).

Thirteen responses to the October 26, 2017, email were received from individuals and organizations accepting consulting party status, as outlined in the table below, and shown in the correspondence in Appendix F. The National Park Service, Midwest Region was included due to the presence of National Historic Landmarks near the project area.

Organization	Representative	Response Date
St. Joseph Neighborhood Association	Peter Haupers (now Mark Godley)	October 26, 2017
Old Northside Neighborhood Association	Nancy Inui	October 26, 2017
Indiana Landmarks	Chad Lethig	October 26, 2017
Indiana Landmarks	Mark Dollase	October 27, 2017
Mayor's Neighborhood Advocate, Area 10	Ruth Ruiz-Morales	October 30, 2017
Cottage Home Neighborhood	Crystal Rehder	November 1, 2017
Indianapolis Department of Public Works	Melody Park	November 3, 201
Fountain Square Neighborhood Association	Desiree Calderella	November 5, 2017
Holy Cross Neighborhood	Jen Higginbotham	November 7, 2017
Lockerbie Square People's Club/Historic Urban Neighborhoods of Indiana (HUNI)	Marjorie Kienle	November 17, 2017
John Boner Neighborhood Centers/Federal Promise Zone (Near Eastside)	Jon Berg	December 13, 2017
Indiana Landmarks	Marsh Davis	December 20, 2017
National Park Service, Midwest Region	Dr. Michele Curran (now Alesha Cerny)	Included due to presence of National Historic Landmarks

By email dated October 22, 2017, Kelley Wensing of Holy Cross Neighborhood Association (HCNA), identified the following properties within and adjacent to the Holy Cross/Westminster Historic District for consideration as historic properties:

- Clemens Vonnegut Public School 9 at 407 N. Fulton Street
- Midland Building (Arts and Antiques Market) at 907 E. Michigan Street
- Anheuser-Busch Building (City Fence) at 920–924 E. Ohio Street
- Properties adjacent to Angie's List Business Center, 1000 block E. Washington Street

These four properties are all located within the APE for the North Split Project. The Clemens Vonnegut Public School 9 at 407 N. Fulton Street is a contributing resource within the boundaries of the Lockerbie Square Historic District. The Midland Building at 907 E. Michigan Street is identified in the Indiana Historic Sites and Structures Inventory (IHSSI) as contributing; contributing structures are considered to be not individually eligible for the NRHP. The Anheuser-Busch Building at 920–924 E. Ohio Street was rated

Notable in the IHSSI. It is within the boundaries of the NRHP-Eligible Holy Cross-Westminster Historic District, and is a contributing building to that district. The Angie's List Business Center buildings are also located within the boundaries of the NRHP-Eligible Holy Cross-Westminster Historic District, and are contributing buildings within the district.

By email dated October 26, 2017, the Windsor Park Neighborhood Association identified the following properties located within Windsor Park Neighborhood for consideration as historic properties:

- Prosser House, 1454 E. 10th Street
- Indianapolis Parks and Boulevard System, Fletcher Park at 1428 Brookside Avenue
- Whittier School, 1119 N. Sterling Street
- Spades Park Library (Indianapolis Public Library Branch No. 6), 1801 Nowland Avenue

Of the above resources, three are within the APE for the North Split Project; the Whittier School at 1119 N. Sterling Street is outside of the APE. All four properties are listed in the NRHP, three individually (Prosser House, Whittier School, and Spades Park Library), and one as a district (Indianapolis Parks and Boulevard System). All are located within the boundaries of the Windsor Park Historic District.

Between January 11 and February 27, 2018, the following individuals and groups requested consulting party status (Appendix G):

Contact	Organization	Date
Patricia Perrin	Old Northside Property Owner	January 12, 2018
Jordan Ryan	North Square Neighborhood Association	January 15, 2018
Isaac Bamgbose	Hendricks Commercial Properties, owner of former Coca-Cola Bottling Plant	January 20, 2018
David Forsell (now Joe Jarzen)	Keep Indianapolis Beautiful	January 25, 2018
Luke Leising	Old Northside Property Owner	January 26, 2018
Garry Chilluffo	HUNI	January 27, 2018
Garry Elder	Old Northside Neighborhood Association	January 31, 2018
Janet Schneider	Old Near Westside	February 6, 2018
Mark Beebe	Indiana Chapter, American Institute of Architects	February 14, 2018
Jeffrey Christoffersen	Lockerbie Square Peoples Club	February 14, 2018
Glenn Blackwood	Fletcher Place Neighborhood Association	February 16, 2018
Andrew House	Fountain Square Neighborhood Association (per request, removed from consulting party list on October 20, 2018)	February 19, 2018
Jim Lingenfelter	Southeast Neighborhood Land Use Committee	February 22, 2018
Josephine Rogers (now Amina Pierson)	Martindale Brightwood neighborhood	February 22, 2018
Paul Knapp	Interstate Business Group	February 26, 2018

These requests were all acknowledged and all consulting parties were sent previous consulting party meeting information, including the materials from the September 2017 meeting and Update Memo #1 (Appendices F and G).

On February 6, 2018, Paula Brooks, a stakeholder in the Old Near Westside, requested consulting party status for Janet Schneider. By email dated February 7, 2018, Janet Schneider was invited to become a consulting party for the North Split Project (Appendix G); however, she did not respond to the invitation.

The HPR was sent to consulting parties by email and Update Memo #1 on January 8, 2018. In a letter dated February 8, 2018, SHPO (Appendix G) concurred with the conclusions of the HPR:

"In regard to buildings and structures, we concur with the conclusion of the historic property report regarding those properties listed in the National Register of Historic Places, Indiana Register of Historic Sites and Structures, and the eligibility and ineligibility of historic resources within the area of potential effects."

No other comments on the HPR were received.

By email dated March 15, 2018, Marsh Davis requested that the National Trust for Historic Preservation (NTHP) be added to the list of consulting parties for the North Split project. Via email dated March 17, 2018, Elizabeth (Betsy) Merritt of the NTHP was invited to become a consulting party. Ms. Merritt responded by email dated March 17, 2018, accepting consulting party status (Appendix G).

A consulting party invitation was sent to the Advisory Council on Historic Preservation (ACHP) by email dated March 26, 2018; the ACHP accepted consulting party status in a letter dated April 3, 2018 (Appendix G).

In an email dated April 30, 2018, Sandy Cummings requested to be a consulting party. Ms. Cummings was added to the consulting party list on May 3, 2019.

By email of May 18, 2018, Paula Brooks of the Old Near Westside advised that Denise Halliburton volunteered to represent the Old Near Westside/Ransom Place as a consulting party. Ms. Halliburton followed up by an email of the same date to confirm her participation (Appendix H).

In an email dated June 8, 2018, Hilary Barnes requested to be added to the consulting parties list as a representative for the Old Northside Neighborhood Association. Ms. Barnes was added to the list on June 10, 2018.

In a letter dated June 20, 2018, the Mass Ave Merchants Association (MAMA) requested Meg Storrow be added to the consulting party list for the project. Ms. Storrow was added as a consulting party on June 21, 2019.

By email dated September 28, 2018, the consulting parties were notified of the availability of the addendum to the HPR and Update Memo #2 on INDOT's IN SCOPE website (<http://erms.indot.in.gov/Section106Documents/>). In a letter dated October 29, 2018, SHPO concurred with the conclusions of the addendum HPR regarding the eligibility and ineligibility of the identified resources in the Expanded APE (Appendix I).

In an email dated September 12, 2019, Meg Storrow asked that Chelsea Humble from the Riley Area Development Corporation be included as a consulting party. Ms. Humble was added to the consulting party list on September 16, 2019.

All individuals or organizations who requested consulting party status were granted it. In some cases, the original individuals who requested to be a consulting party are no longer with the organization. The individuals currently representing each organization as a consulting party are included in Appendix D.

3. DESCRIBE AFFECTED HISTORIC PROPERTIES

The following table lists the historic properties within the APE, organized by effect finding.

Table 4. Affected Historic Properties within the APE

NRHP/HB/ IHSSI No	Name and Address of Resource	NR Criteria	Date of Listing	Brief Description
No Effect				
NR-2410/IHSSI #098-296-01173	Indianapolis Public Library Branch No. 6 1801 Nowland Avenue	A and C	2016	Constructed 1911–1912, two-story central block with one-story wings; Italian Renaissance Revival and Craftsman styles
NR-0090/IHSSI #098-296-01219	Prosser House 1454 E. 10 th Street	C	1975	One-and-one-half-story cross-plan house, built in 1886
NR-0146/IHSSI #098-296-01375	Bals-Wocher House 951 N. Delaware Street	C	1979	Significant as an example of the Italianate style
NR-0616.26/IHSSI #098-296-01379	Pennsylvania Apartments 919 N. Pennsylvania Street	A and C	1983	Three-story building built in 1906
NR-0616.25/IHSSI #098-296-01389	The Myrtle Fern 221 E. 9 th Street	A and C	1983	Two-story building constructed ca. 1925
NR-0616.09/IHSSI #098-296-01391	Cathcart Apartments 103 E. 9 th Street	A and C	1983	Three-story building built in 1909; Craftsman style
NR-0616.19/IHSSI #098-296-01392	Lodge Apartments 829 N. Pennsylvania Street	A and C	1983	Georgian Revival-style three-story building, built in 1905
NR-0616.27/IHSSI #098-296-01393	Plaza Apartments 902 N. Pennsylvania Street	A and C	1983	Three-story U-shaped building built in 1907
NR-0085/IHSSI #098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St Clair Street	C	1975	Built from 1913–1916, Beaux Arts-style building faced in Indiana limestone
NR-0616.08/IHSSI #098-296-01396	The Burton 821–823 N. Pennsylvania Street	A and C	1983	Two-story building built ca. 1920 in the Spanish Colonial Revival style
NR-0725/IHSSI #098-296-01415	The Vera and The Olga 1440–1446 N. Illinois Street	C	1984	Rare example of rowhouse construction
NR-0641/IHSSI #098-296-01428	Independent Turnverein 902 N. Meridian Street	A and C	1983	Prairie, Craftsman, and Renaissance Revival styles; connection to the German community; built 1913-1914
NR-2043/IHSSI #098-296-14063	John W. Schmidt House (The Propylaeum) 1410 N. Delaware Street	A and C	1973	Tudor architectural style, with the use of brick, limestone banding, and parapeted gables
NR-1560/IHSSI #098-296-01309	School #27–Charity Dye Elementary School 545 E. 17 th Street	A and C	2000	Two-story central section of the building built ca. 1882; Italianate style

Table 4. Affected Historic Properties within the APE

NRHP/HB/ IHSSI No	Name and Address of Resource	NR Criteria	Date of Listing	Brief Description
NR-2067/IHSSI #098-296-20038	James Whitcomb Riley House 528 Lockerbie Street	A and B	1966	Built in 1872, two-story building with Italianate style design features
NBI No. 4900233/HB-2611	Marion County Bridge No. 2520L Oriental Street over Pogue's Run	C	N/A	Horizontal curved deck representing an important bridge construction technique
IHSSI #098-296- 01220	James E. Roberts School No. 97 1401 E. 10 th Street	A and C	N/A	The school was constructed in 1936 as a public school for disabled students, and originally featured rooms for occupational therapy, hydrotherapy, physical therapy, and medical facilities
IHSSI #098-296- 01378	Knights of Pythias 941 N. Meridian Street	C	N/A	Three-story commercial building constructed in 1925; elaborate terra cotta facade
IHSSI #098-296- 01421	Fame Laundry 1352 N. Illinois Street	C	N/A	Two-story commercial building constructed in 1929
IHSSI #098-296- 01426	Stutz Motor Car Company 1002–1008 N. Capital Avenue	A and C	N/A	Four-story former industrial building significant for its association with the early twentieth-century automobile industry in Indianapolis
N/A	Martin Luther King, Jr. Park 1701 Broadway Street	A and B	N/A	Designed by Indiana artist Greg Perry, consists of bronze sculptures of Martin Luther King, Jr and Robert F Kennedy each emerging from the surrounding steel, on opposite sides of a brick-lined path
N/A	St. Rita's Catholic Church Parish Complex 1733 Dr. Andrew J Brown Avenue	A and C, Criteria Consideration A	N/A	Complex includes church designed by architect Charles Brown, built 1958; a rectory; a parish hall; and a former school building
No Adverse Effect				
NR-0438	Herron-Morton Place Historic District	A and C	1983	Significant architecturally for its outstanding collection of late nineteenth- and early twentieth- century residential architecture
NR-0355	Fletcher Place Historic District	A and C	1982	Significant for its collection of buildings from the early settlement of Indianapolis' south side and as a prestigious residential area with a collection of more modest housing and a commercial corridor

Table 4. Affected Historic Properties within the APE

NRHP/HB/ IHSSI No	Name and Address of Resource	NR Criteria	Date of Listing	Brief Description
NR-0965	Cottage Home Historic District	C	1990	Significant for late nineteenth-century typical workers' cottages, and for a collection of seven buildings all constructed for the same owner and designed by the leading Indianapolis architectural firm of Vonnegut and Bohn
NR-0084	Arsenal Technical High School Historic District	A and C	1976	Significant for its association with Indiana's military history and with Indianapolis' educational history, and for its architectural significance
NR-1711	Indianapolis Park and Boulevard System Historic District	A and C	2003	The Brookside Parkway in this area includes Spades Park and other component features
NR-0616.33/IHSSI #098-296-01367	Wyndham 1040 N. Delaware Street	A and C	1983	Tudor Revival-style seven-story apartment building built in 1929
NR-0203/IHSSI #098-296-01368	Pierson-Griffiths House 1028 N. Delaware Street	C	1978	One-and-one-half-story house built in 1873 by Charles C. Pierson
NR-0694/IHSSI #098-296-01369	Calvin I. Fletcher House 1031 N. Pennsylvania Street	B and C	1983	Two-and-one-half-story Queen Anne-style house built in 1895
NR-0616.03/IHSSI #098-296-01394	The Ambassador 39 E. 9 th Street	A and C	1983	Six-story building built in 1923; Sullivanesque style
NR-0616.23/IHSSI #098-296-01390	The Shelton 825 N. Delaware Street	A and C	1983	The five-story building constructed in 1925
NR-0332/IHSSI #098-296-01651	Cole Motor Car Company 730 E. Washington Street	A	1983	Cole Motor Car Company was a leading manufacturer of automobiles in the early years of the twentieth century and one of the earliest producers of luxury automobiles
NR-2266	Gaseteria, Inc. 1031 E. Washington Street	B and C	2013	One-story office building built in 1941 in the Art Moderne style
NR-1406	Manchester Apartments 960–962 N. Pennsylvania Street	C	1998	Three-story apartment building with ground floor commercial office space constructed in 1929
NR-1373	Sheffield Inn 956–958 N. Pennsylvania Street	C	1998	Two-story building built in 1926–1927 as a small residential hotel with ground floor commercial
NR-0616.11/IHSSI #098-296-01370	Delaware Court 1005 N. Delaware Street	A and C	1983	Tudor Revival-style building; built 1917
NR-0616.28/IHSSI #098-296-01385	The Spink (Renaissance Tower Historic Inn) 230 E. 9 th Street	A and C	1983	Six-story building built ca. 1922; one of first high rise apartment buildings constructed in Indianapolis

Table 4. Affected Historic Properties within the APE

NRHP/HB/ IHSSI No	Name and Address of Resource	NR Criteria	Date of Listing	Brief Description
NR-0897/IHSSI #098-296-01353	William Buschman Block 968–972 Fort Wayne Avenue	B and C	1988	Three-story building built ca. 1879 by William Buschman, a grocery and grain dealer; Italianate style
NR-0695/IHSSI #098-296-01373	Pearson Terrace 928–940 N. Alabama Street	A and C	1984	Two-story building built ca. 1901–1902 by George C. Pearson
NR-0653	Holy Cross/Westminster Historic District	A and C	1984	Indianapolis' largest intact residential inner-city neighborhood with an extensive collection of architectural styles
NR-2066/IHSSI #098-296-14057	Benjamin Harrison Home/ Presidential Site 1230 N. Delaware Street	A, B, and C	1964	Two-and-one-half-story house built in 1874–1875; Italianate style
IHSSI #098-296- 01212	John Hope School No. 26 1301 E. 16 th Street	C	N/A	Three-story U-shaped building; designed by architect Elmer E. Dunlap; built in 1921
N/A	Saints Peter and Paul Cathedral Parish Historic District	A and C	N/A	Neoclassical or Italian Renaissance Revival Catholic church parish
N/A	Windsor Park Neighborhood Historic District	A and C	N/A	Collection of one- to one-and-one-half-story to two-story houses built between 1880 and 1920
Adverse Effect				
NR-0157 and NR- 0716	Old Northside Historic District	A and C	1978	Popular residential neighborhood for the city's leading citizens during the late nineteenth and early twentieth centuries; contains important examples of residential and ecclesiastical architecture, including the individually NRHP-listed Morris-Butler House
NR-0926	Saint Joseph Neighborhood Historic District	A and C	1991	Significant multi-use district whose component resources reflect the city's development during the late nineteenth and early twentieth centuries
NR-0327	Chatham-Arch Historic District	A and C	1980	Mixed-use neighborhood containing residential, commercial, and industrial resources
NR-0525	Massachusetts Avenue Commercial Historic District	A and C	1982	Important secondary retail district and service center for the adjoining residential areas

Table 4. Affected Historic Properties within the APE

NRHP/HB/ IHSSI No	Name and Address of Resource	NR Criteria	Date of Listing	Brief Description
NR-0853 and NR-2030	Lockerbie Square Historic District	A and C	1973; 1987	Wide range of architectural styles that reflect the history of the neighborhood from before the Civil War to the early twentieth century
NR-2027/IHSSI #098-296-14219	Morris-Butler House 1204 N. 12 th Street	C	1973	Second Empire style exemplified by the slate Mansard roof, central tower, and arched windows

4. DESCRIBE THE UNDERTAKING'S EFFECTS ON HISTORIC PROPERTIES AND EXPLAIN APPLICATION OF CRITERIA OF ADVERSE EFFECT

No Effects

Certain properties within the APE are located at a sufficient distance from the project area and/or have intervening topography, vegetation, or other buildings such that the interstate is not visible from those properties, nor will the undertaking make the interstate visible from those properties. These properties are also sufficiently far from the interstate that traffic noise and construction vibration impacts are not anticipated. Permanent or temporary traffic changes in the vicinity of these properties are expected to be minor and imperceptible. The undertaking will have No Effect on the following properties:

- Indianapolis Public Library Branch No. 6 (NR-2410/IHSSI #098-296-01173)
- Prosser House (NR-0090/IHSSI #098-296-01219)
- Bals-Wocher House (NR-0146/IHSSI #098-296-01375)
- Pennsylvania Apartments (NR-0616.26/IHSSI #098-296-01379)
- The Myrtle Fern (NR-0616.25/IHSSI #098-296-01389)
- Cathcart Apartments (NR-0616.09/IHSSI #098-296-01391)
- Lodge Apartments (NR-0616.19/IHSSI #098-296-01392)
- Plaza Apartments (NR-0616.27/IHSSI #098-296-01393)
- Central Library of Indianapolis-Marion County Public Library (NR-0085/IHSSI #098-296-01395)
- The Burton (NR-0616.08/IHSSI #098-296-01396)
- The Vera and the Olga (NR-0725/IHSSI #098-296-01415)
- Independent Turnverein (NR-0641/IHSSI #098-296-01428)
- John W. Schmidt House (The Propylaeum) [NR-2043/IHSSI #098-296-14063]
- School #27-Charity Dye Elementary School (NR-1560/IHSSI #098-296-01309)
- James Whitcomb Riley House (NR-2067/IHSSI #098-296-20038)
- Marion County Bridge No. 2520L (NBI No. 4900233/HB-2611)
- James E. Roberts School No. 97 (IHSSI #098-296-01220)
- Knights of Pythias (IHSSI #098-296-01378)
- Fame Laundry (IHSSI #098-296-01421)
- Stutz Motor Car Company (IHSSI #098-296-01426)
- Martin Luther King, Jr. Park
- St. Rita's Catholic Church Parish Complex

For the remaining properties, the following discussions will describe the undertaking's effect on each historic property and explain the application of the criteria of adverse effect for each historic property.

According to 36 CFR 800.5(a)(1), which states: "A finding of "adverse effect" is appropriate when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association," the criteria of adverse effect apply.

Examples of adverse effects are identified in 36 CFR 800.5(a)(2) and include, but are not limited to, the following:

- Physical destruction of or damage to all or part of the property;
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
- Removal of the property from its historic location;
- Change of the character of the property's use or physical features within the property's setting that contribute to its historic significance;
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The effects assessment determined the examples of adverse effects identified in 36 CFR 800.5 listed below are not anticipated to result from the North Split Project. The following examples do not apply for any historic properties within the APE, and therefore no further analysis of these types of effects is provided in this report. Other examples of adverse effects may or may not apply; they are examined in more depth in the following sections of the report.

- Physical destruction of or damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines;
- Removal of the property from its historic location;
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Project activities will include replacing or rehabilitating bridges throughout the project area; replacing the pavement throughout the project area; reconstructing the Pennsylvania Street and Delaware Street ramps; reconstructing the North Split interchange; modifying the Pine Street entrance to I-65; constructing retaining walls or vegetated slopes along the interstate sideslopes; landscaping within the right-of-way; possible noise barriers; traffic signal modifications and possible installation of ADA curb ramps at various locations; possible construction of detention ponds or other drainage; replacing light poles and high mast light towers along the interstate; replacing existing signage; relocating overhead power lines and installing larger metal utility poles; relocating existing utilities and storm sewers within the existing right-of-way; and installing fiber optic conduits and access vaults within the existing right-of-way.

No Adverse Effects

With regard to all of the properties discussed below, the undertaking will not require acquisition of property from within the historic property boundaries of individually NRHP-listed historic structures and historic districts.

With regard to vibration, a vibration study was undertaken to assess highway traffic-induced vibration. This study is discussed in more detail in Appendix B of the Assessment of Effects Report, which is available on INDOT's IN SCOPE website (<http://erms.indot.in.gov/Section106Documents/>). Short-term vibration impacts are expected to result from construction activities in the vicinity of some historic properties. As a result, the contractor will be required to prepare a Vibration Monitoring and Control Plan for construction activities. Because the contractor will be required to keep vibration levels under values that would be detrimental to historic structures, no adverse effects to historic properties are anticipated from construction-induced vibration.

No adverse effects are anticipated from permanent or temporary traffic changes. The traffic analysis is included in Appendix A of the Assessment of Effects Report, available on INDOT's IN SCOPE website.

Herron-Morton Place Historic District (NR-0438)

The Herron-Morton Place Historic District is approximately 2,073 feet from the proposed edge of pavement of the interstate. Features that contribute to the historic significance of the historic district within its setting will not be physically impacted. Some of the proposed new infrastructure within the center of the North Split interchange as planned will be 17 feet taller than the existing. The increase in height will not be sufficient for the interstate to become visible from the historic district as a result of the undertaking.

Permanent traffic changes are anticipated to be minor near and within this district. There are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district's setting that contribute to its historic significance.

The interstate is an already existing intrusion on the integrity of the Herron-Morton Place Historic District and the project activities will not make the intrusion more visible from within the district. Project activities will not have an impact on the characteristics that qualify the Herron-Morton Place Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Herron-Morton Place Historic District. Per 36 CFR 800.5(a)(2)(iv), and based on the information above, the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” The historic district is 2,073 feet from its closest point to the undertaking, and even the tallest new infrastructure will not be visible from within the historic district. In addition, the distance between the historic district and the undertaking is sufficient that traffic noise from the undertaking will not impact the historic district.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Fletcher Place Historic District (NR-0355)

The Fletcher Place Historic District is approximately 1,166 feet from the proposed edge of pavement of the interstate at its closest point. Due to the distance between the undertaking and the historic district, the features that contribute to the historic significance of this district within the historic district’s setting will not be physically impacted. The proposed undertaking will not result in new interstate features that will be visible from within the historic district. The historic district is sufficiently far from the undertaking that there will be no impact from traffic noise.

The undertaking is expected to result in a permanent increase in traffic (a total density rate change of 2.2 vehicles/minute/lane in the peak hour) along a portion of Virginia Avenue within the historic district; however, the forecasted traffic is still anticipated to be under capacity for Virginia Avenue. In addition, there are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district’s setting that contribute to its historic significance.

The interstate is an already existing intrusion on the integrity of the Fletcher Place Historic District and the project activities will not make the intrusion more visible from within the district. Project activities will not have an impact on the characteristics that qualify the Fletcher Place Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Fletcher Place Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” The historic district is 1,166 feet from the undertaking at its closest point, and the undertaking will not result in new interstate features that will be visible from within the historic district. In addition, the distance between the historic district and the undertaking is sufficient that traffic noise from the undertaking will not impact the historic district.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Cottage Home Historic District (NR-0965)

The Cottage Home Historic District is approximately 471 feet from the proposed edge of pavement of the interstate at its closest point. The existing I-65/I-70 bridges over St. Clair Street are visible from within the historic district and will be replaced, but the height and length of the replacement bridges are not anticipated to differ significantly from the existing bridges. It is anticipated that existing vegetation within INDOT's right-of-way will need to be removed, but, because the existing vegetation is largely imperceptible from the historic district, its removal will not have an effect on the historic district. Existing electric poles and the existing electric conductor lines located outside of the boundaries of the historic district but within its viewshed may be replaced with new taller poles and lines. Changes in traffic noise resulting from the undertaking are anticipated to range between -0.6 to 1.0 dB(A), which would not be perceptible to the human ear.

Permanent and temporary traffic changes are anticipated to be minor within and near the historic district. There are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district's setting that contribute to its historic significance.

The interstate is an already existing intrusion on the integrity of the Cottage Home Historic District and the project activities will not make the intrusion more visible from within the district. Project activities will not have an impact on the characteristics that qualify the Cottage Home Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Cottage Home Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance."

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the "Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Visual changes will not create a new intrusion that will diminish the historic district's integrity of setting. Changes in traffic noise resulting from the undertaking will not be perceptible by the human ear.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Arsenal Technical High School Historic District (NR-0084)

The Arsenal Technical High School Historic District is approximately 1,414 feet from the proposed edge of pavement of the interstate at its closest point. Features that contribute to the historic significance of the historic district within its setting will not be physically impacted. The undertaking will not result in new highway features that will be visible from within the historic district, and the historic district is sufficiently far from the undertaking that there will be no impact from traffic noise.

Permanent and temporary traffic changes are anticipated to be minor within and near the historic district. There are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district's setting that contribute to its historic significance.

The interstate is an already existing intrusion on the integrity of the Arsenal Technical High School Historic District, but the project activities described above will not make the intrusion more visible from within the district. Project activities will not have an impact on the characteristics that qualify the Arsenal Technical High School Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Arsenal Technical High School Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” The historic district is approximately 1,414 feet from the proposed edge of shoulder at its closest point with intervening buildings and vegetation. The undertaking will not result in new highway features that will be visible from within the historic district. In addition, the distance between the historic district and the undertaking is sufficient that traffic noise from the undertaking will not impact the historic district.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Indianapolis Park and Boulevard System Historic District (NR-1711)

The Indianapolis Park and Boulevard System Historic District is approximately 838 feet from the proposed edge of pavement of the interstate at its closest point. Features that contribute to the historic significance of the historic district within its setting will not be physically impacted. The undertaking will not result in new highway features that will be visible from within the historic district, and the historic district is sufficiently far from the undertaking that there will be no impact from traffic noise.

Permanent traffic changes are anticipated to be minor near and within this district. The APE includes two bridges (Marion County Bridge No. 2514F and Marion County Bridge No. 1803F) that contribute to the historic district. Apart from these two contributing bridges, there are no other contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. The contributing bridges may need to carry a temporary minor increase in heavy truck traffic, but both bridges have the structural capacity to carry such traffic. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district’s setting that contribute to its historic significance will not be impacted. Therefore, the traffic changes will not result in an adverse effect to the historic district.

The undertaking is not expected to create a perceptible visual change in the setting of the historic district. The historic district is sufficiently removed from the undertaking that traffic noise impacts are not anticipated. The undertaking will not force a change in the use of the district and will not impact physical features within the historic district’s setting that contribute its historic significance.

The interstate is an already existing intrusion on the integrity of the setting of the Indianapolis Park and Boulevard System Historic District, but the project activities described above will not make the intrusion more visible from within the district. Project activities will not have an impact on the characteristics that qualify the Indianapolis Park and Boulevard System Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Indianapolis Park and Boulevard System Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features of the historic district within its setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” The undertaking is not expected to create a perceptible visual change in the setting of the historic district. The historic district is sufficiently removed from the undertaking that traffic noise impacts are not anticipated.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Wyndham (NR-0616.33/IHSSI #098-296-01367)

The Wyndham is located approximately 78 feet southwest of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. Changes to the interstate in the vicinity of the Wyndham include reconstructing and widening the Delaware Street entrance ramp to the interstate, modifying or replacing traffic signals and installing ADA-compliant curb ramps at the intersection of Delaware and 11th streets, and widening I-65 slightly east of Alabama Street. The locations of the ADA-compliant ramp work are modern concrete sidewalks and do not contribute to the historic character of the property.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Wyndham are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will include changes to the existing interstate and entrance ramp that are within the viewshed of the Wyndham. The interstate is an already existing intrusion on the integrity of the setting of the Wyndham. In part because of proximity of the Wyndham to the interstate, and in part due to the height of the Wyndham, the interstate is already readily visible from this historic property; the project activities described above will not increase the existing visual intrusion. These changes will not have an impact on the characteristics that qualify the Wyndham apartment building for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Wyndham. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of a new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Wyndham are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Pierson-Griffiths House (NR-0203/IHSSI #098-296-01368)

The Pierson-Griffiths House is located approximately 140 feet southwest of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. Changes in the vicinity of the house include reconstructing and widening the Delaware Street entrance ramp to I-65, modifying or replacing traffic signals and installing ADA-compliant curb ramps at the intersection of Delaware and 11th streets, and widening I-65 slightly east of Alabama Street. The locations of the ADA-compliant ramp work are modern concrete sidewalks and do not contribute to the historic character of the property.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Pierson-Griffiths House are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will include changes to the existing interstate and entrance ramp that are within the viewshed of the Pierson-Griffiths House. The interstate is an already existing intrusion on the integrity of the Pierson-Griffiths House, but the project activities described above will not increase the existing visual intrusion. As a result, these changes will not have an impact on the characteristics that qualify the Pierson-Griffiths House for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Pierson-Griffiths House. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Pierson-Griffiths House are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Calvin I. Fletcher House (NR-0694/IHSSI #098-296-01369)

The Calvin I. Fletcher House is approximately 304 feet southwest of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. Due to the house’s proximity to the undertaking, changes to the Pennsylvania Street exit ramp and the Delaware Street entrance ramp will be visible from the property. Both ramps will be reconstructed as part of the proposed undertaking, and will be slightly wider than the existing. Other activities will include modifying or replacing traffic signals at the intersection of Delaware and 11th streets and installing ADA-compliant curb ramps. The locations of the ADA-compliant ramp work are modern concrete sidewalks and do not contribute to the historic character of the property.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Calvin I. Fletcher House are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will include changes to the existing interstate and entrance ramps that are within the viewshed of the Calvin I. Fletcher House, as well as the modification or replacement of traffic signals, and the generation of minor imperceptible changes in traffic. The interstate is an already existing intrusion on the integrity of the setting of the Calvin I. Fletcher House, but the project activities described above will not increase the existing visual intrusion. As a result, these changes will not have an impact on

the characteristics that qualify the Calvin I. Fletcher House for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Calvin I. Fletcher House. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Calvin I. Fletcher House are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

The Ambassador (NR-0616.03/IHSSI #098-296-01394)

The Ambassador is located approximately 1,271 feet southwest of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. The undertaking will potentially be visible from the higher floors of the building, although not from the lower floors.

The building is sufficiently far from the undertaking that traffic noise effects are not anticipated. Impacts from traffic changes are anticipated to be minor.

The proposed undertaking will have minor visual effects from upper floors and will introduce only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of The Ambassador, but the project activities described above will not increase the existing visual intrusion. These changes will not have an impact on the characteristics that qualify The Ambassador for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Ambassador. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. The building is sufficiently far from the undertaking that traffic noise effects are not anticipated.

Therefore, the undertaking will have No Adverse Effect on the historic property.

The Shelton (NR-0616.23/IHSSI #098-296-01390)

The Shelton is located approximately 1,233 feet south of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. The undertaking will potentially be visible from the higher floors of the building, although not from the lower floors.

The building is sufficiently far from the undertaking that traffic noise effects are not anticipated. Impacts from traffic changes are anticipated to be minor.

The proposed undertaking will have minor visual effects from upper floors and will introduce only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of The Shelton, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify The Shelton for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Shelton. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. The building is sufficiently far from the undertaking that traffic noise effects are not anticipated.

Therefore, the undertaking will have No Adverse Effect on the property.

Cole Motor Car Company (NR-0332/IHSSI #098-296-01651)

The Cole Motor Car Company is located approximately 124 feet west of the proposed edge of pavement of the interstate. Although the Washington Street, Market Street, and Ohio Street bridges are visible from the property and will be replaced, the proposed new bridges will only have a minor increase in height over the existing bridges.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Cole Motor Car Company are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and will introduce only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of the setting of the Cole Motor Car Company building, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Cole Motor Car Company building for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Cole Motor Car Company. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)2(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Cole Motor Car Company are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Gaseteria, Inc. (NR-2266)

The Gaseteria, Inc., is located approximately 809 feet east of the proposed edge of pavement of the interstate. Due to the historic property’s proximity to the undertaking, the current elevated alignment of I-65/I-70 and the bridge over Washington Street are visible from the property. The proposed pavement will be approximately five feet closer to the historic property, and the interstate will be approximately one foot taller than the existing interstate.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Gaseteria, Inc. are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and will introduce only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of the setting of the Gaseteria, Inc., but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Gaseteria, Inc. for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Gaseteria, Inc. Per 36 CFR 800.5(a)2(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)2(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Gaseteria, Inc., are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Manchester Apartments (NR-1406)

The Manchester Apartments is located approximately 742 feet southwest of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. Due to the proximity to the undertaking, changes to the Delaware Street entrance ramp to the interstate may be visible from the property, such as minor changes to slopes or reconstructed sidewalks.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Manchester Apartments are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and will result in only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of the setting of the

Manchester Apartments, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Manchester Apartments for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Manchester Apartments. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Manchester Apartments are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Sheffield Inn (NR-1373)

The Sheffield Inn is located approximately 773 feet southwest of the proposed edge of pavement of the Delaware Street entrance ramp to the interstate. Due to the proximity to the undertaking, changes to the Delaware Street entrance ramp to I-65 may be visible from the property, such as minor changes to slopes or reconstructed sidewalks.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the Sheffield Inn are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and will introduce only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of the setting of the Sheffield Inn, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Sheffield Inn for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Sheffield Inn. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at the Sheffield Inn are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Delaware Court (NR-0616.11/IHSSI #098-296-01370)

Delaware Court is located approximately 248 feet south of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. Changes to the interstate in the vicinity of the building include reconstructing and widening the Delaware Street entrance ramp to the interstate, modifying or replacing traffic signals at the intersection of Delaware and 11th streets, and installing ADA-compliant curb ramps. The locations of the ADA-compliant ramp work are modern concrete sidewalks and do not contribute to the historic character of the property.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at Delaware Court are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and will introduce only minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of Delaware Court, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Delaware Court for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Delaware Court. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at Delaware Court are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

The Spink (Renaissance Tower Historic Inn) (NR-0616.28/IHSSI #098-296-01385)

The Spink is located approximately 978 feet south of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. The undertaking will potentially be visible from the higher floors of the building, although not from the lower floors. The building is sufficiently far from the undertaking that traffic change and traffic noise effects are not anticipated.

The proposed undertaking will have minor visual effects, but the interstate is an already existing intrusion on the integrity of The Spink. The project activities described above will not increase of the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify The Spink for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Spink. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Visual changes

will not rise to the level of new intrusion that will diminish the building's integrity of setting. The building is sufficiently far from the undertaking that traffic changes and traffic noise effects are not anticipated.

Therefore, the undertaking will have No Adverse Effect on the historic property.

William Buschman Block (NR-0897/IHSSI #098-296-01353)

The William Buschman Block is located approximately 478 feet south of the proposed edge of pavement of the interstate. The undertaking will widen and raise the height of the interstate, as well as require the construction of a new 10 to 12-foot-tall retaining wall and may also add a noise barrier. However, due to the building's angled position at the intersection of Central and Fort Wayne avenues, the undertaking will have little visibility of these changes.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the William Buschman Block are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have only minor visual effects and will introduce minor imperceptible changes to traffic. The interstate is an already existing intrusion on the integrity of the setting of the William Buschman Block, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the William Buschman Block for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the William Buschman Block. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance."

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the "Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building's integrity of setting. Traffic noise levels at the William Buschman Block are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

Pearson Terrace (NR-0695/IHSSI #098-296-01373)

Pearson Terrace is located approximately 657 feet southeast of the proposed edge of pavement of the Delaware Street entrance ramp to I-65. Due to the proximity of the existing I-65 interstate and work proposed at the nearest point to the historic property, the undertaking will be visible from Pearson Terrace. A new bridge carrying the Delaware Street entrance ramp will be constructed as part of the project. The proposed new bridge is similar in size and location to the bridge; thus the visual components of the undertaking will not have an impact on Pearson Terrace.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at Pearson Terrace are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and only minor imperceptible increases in traffic. The interstate is an already existing intrusion on the building's setting, but the project activities described

above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Pearson Terrace for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Pearson Terrace. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels at Pearson Terrace are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the property.

Holy Cross/Westminster Historic District (NR-0653)

The Holy Cross/Westminster Historic District is 69 feet from the proposed edge of pavement of the interstate at its closest point. The historic district has an unobstructed view of the I-65/I-70 corridor from the area near its western boundary. The pavement will be approximately three feet closer to the eastern right-of-way boundary. The replacement of the I-65/I-70 bridges over Washington Street, Market Street, Ohio Street/CSX Railroad, and New York Street will be visible from within the historic district. The proposed replacement bridges are not anticipated to differ significantly from the existing bridges and will not be meaningfully different from the existing.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels in the Holy Cross/Westminster Historic District are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will result in minor impacts to the district’s setting due to the increased height of some bridges and the closer edge of pavement. However, the interstate is an already existing intrusion on the integrity of the setting of the Holy Cross/Westminster Historic District, and the project activities described above will make the intrusion only slightly more visible from within the district. The interstate is an already existing intrusion on the building’s setting, but the project activities described above will not substantially increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Holy Cross/Westminster Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Holy Cross/Westminster Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels in the Holy Cross/Westminster Historic District are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Benjamin Harrison Home/Presidential Site (NR-2066/IHSSI #098-296-14057)

The proposed edge of pavement of the Pennsylvania Street exit ramp will be located approximately 67 feet south of the Benjamin Harrison Home/Presidential Site's NRHP and NHL boundaries and approximately 390 feet south of the dwelling. As part of the undertaking, the Pennsylvania Street exit ramp will be reconstructed just south of the property within the existing right-of-way. Neither the interstate nor the Pennsylvania Street exit ramp will be wider or higher than existing conditions in front of the Benjamin Harrison Home/Presidential Site. The portion of the Pennsylvania Street exit ramp in front of the Benjamin Harrison Home/Presidential Site will include a bridge and a vegetated sideslope. In addition to the proposed construction, all of the existing vegetation within the highway right-of-way could be removed. However, existing vegetation located outside the right-of-way and in the southwest corner of the historic property will remain, providing some screening between the historic property and the reconstructed highway and exit ramp.

Traffic noise levels at the Benjamin Harrison Home/Presidential Site are predicted to decrease slightly as a result of the undertaking.

Impacts from traffic changes are anticipated to be minor. Access to the site from I-70 westbound will follow a different path to access the site due to the reconfiguration of the Pennsylvania Street exit ramp, adding approximately 1.1 to 1.5 miles to the route to access the site. Additional information about the analysis of the access to the site is outlined in Update Memo #6 (Appendix M).

The proposed undertaking will have minor visual effects and only minor increases in traffic. The present interstate alignment is an already existing intrusion on the integrity of the setting of the Benjamin Harrison Home/Presidential Site. The project activities described above will not increase the intensity of the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Benjamin Harrison Home/Presidential Site for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Benjamin Harrison Home/Presidential Site. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance."

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the "Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Permanent traffic changes and temporary increases in heavy truck traffic are anticipated to be minor near this building. Visual changes will not rise to the level of new intrusion that will diminish the building's integrity of setting. Traffic noise levels at the Benjamin Harrison Home/Presidential Site are expected to decrease as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic property.

John Hope School No. 26 (IHSSI #098-296-01212)

John Hope School No. 26 is located approximately 207 feet northwest of the proposed edge of pavement of the interstate. Due to the height of the building and its proximity to the existing interstate, changes to the graded alignment of I-70 will be visible from the property. These changes include reconstruction of

the interstate with a small amount (0 to 5 feet) of widening towards the school and the possible removal of vegetation within the existing highway right-of-way.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels at the John Hope School No. 26 are predicted to decrease slightly as a result of the undertaking. A noise barrier (NB3W) may be constructed on top of the proposed new interstate, with an average height of 14 feet measuring from the proposed interstate height.

The proposed undertaking will result in minor impacts to the property's setting due to the widening of the interstate and to a minor anticipated increase in traffic. The noise barrier, together with the slightly closer edge of pavement, will be visible from the building. The existing interstate is an already existing intrusion on the integrity of John Hope School No. 26. The school building is located farther away from possible noise barriers than other resources for which a finding of Adverse Effect has been recommended. Because this property is not a residential property, it is not as sensitive to the visual intrusion of the interstate. The building was recommended eligible for the NRHP under Criterion C for its architecture, and the building's ability to convey its architectural significance will not be diminished by the presence of the noise barrier. In addition, the building is oriented with its front elevation facing north, away from the interstate, with a large paved area and vegetation between the building and the interstate. As a result, if the noise barrier is constructed, it would not have an impact on the characteristics that qualify John Hope School No. 26 for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the John Hope School No. 26. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance."

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the "Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Any visual changes will not create a heightened level of intrusion that will diminish the building's integrity of setting. Traffic noise levels at the John Hope School No. 26 are predicted to decrease slightly as a result of the undertaking.

The recommended finding, with or without the noise barrier, remains No Adverse Effect.

Saints Peter and Paul Cathedral Parish Historic District

The Saints Peter and Paul Cathedral Parish Historic District is approximately 598 feet from the proposed edge of pavement of the Pennsylvania Street exit ramp at its closest point. The existing exit ramp cannot easily be seen from the east boundary of the historic district, and the reconstruction will not make the exit ramp more visible.

Impacts from traffic changes are anticipated to be minor. Traffic noise levels in the Saints Peter and Paul Cathedral Parish Historic District are predicted to decrease slightly as a result of the undertaking.

The proposed undertaking will have minor visual effects and will introduce minor imperceptible changes to traffic. The interstate is an already existing intrusion on the setting of the historic district, but the project activities described above will not increase the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Saints Peter and Paul Cathedral Parish Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Saints Peter and Paul Cathedral Parish Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Traffic noise levels in the Saints Peter and Paul Cathedral Parish Historic District are predicted to decrease slightly as a result of the undertaking.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Windsor Park Neighborhood Historic District

The Windsor Park Neighborhood Historic District is 539 feet from the proposed edge of pavement of the interstate at its closest point. Views of the existing I-65/I-70 corridor are limited and intermittent due to the presence of commercial and industrial buildings outside the historic district boundary along Massachusetts Avenue. Some of the proposed new infrastructure is anticipated to be taller than the existing ramps and bridges, but the increase in height is not anticipated to be visible from within the historic district. The I-65/I-70 bridges over 10th Street will be replaced and increased in height as part of the undertaking, but the height and length of the replacement bridges are not anticipated to differ significantly from the existing bridges.

Impacts from traffic changes are anticipated to be minor. Changes in traffic noise resulting from the undertaking are predicted to increase by 1.0 dB(A), which should not be perceptible to the human ear.

The proposed undertaking will have minor visual and noise effects and will introduce minor imperceptible changes to traffic. The interstate is an already existing intrusion on the setting of the Windsor Park Neighborhood Historic District, but the project activities described above will not increase the intensity of the existing visual intrusion. Project activities will not have an impact on the characteristics that qualify the Windsor Park Neighborhood Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), do not apply to the Windsor Park Neighborhood Historic District. Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.”

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Impacts from traffic changes are anticipated to be minor. Visual changes will not rise to the level of new intrusion that will diminish the building’s integrity of setting. Changes in traffic noise resulting from the undertaking are predicted to increase by 1.0 dB(A), which should not be perceptible by the human ear.

Therefore, the undertaking will have No Adverse Effect on the historic district.

Adverse Effects

Old Northside Historic District (NR-0157 and NR-0716) and Morris-Butler House (NR-2027/IHSSI #098-296-14219)

The Old Northside Historic District and the Morris-Butler House are located immediately adjacent to the existing right-of-way line of the interstate west of the North Split and north of I-65. The Morris-Butler House is individually listed in the NRHP and a contributing property to the Old Northside Historic District.

As a result of the undertaking, the edge of pavement of the Pennsylvania Street exit ramp will be moved a maximum of 26 feet closer to the historic district boundary, vegetation will be removed from within the right-of-way, and a noise barrier may be built atop the new road. In order to widen the exit ramp just south of the Morris-Butler House, the present slope will be converted to a retaining wall to eliminate the need for new right-of-way to accommodate fill slopes. This retaining wall will be within the existing right-of-way of I-65, but will be approximately 21 to 25 feet closer to the property than the existing pavement on the north side of I-65. The retaining wall will be approximately 10 to 12 feet tall.

The proposed elevation of the road at this location will be approximately six to seven feet taller than the existing road, with a 4-foot Jersey barrier on top of it. The noise barrier, if built, will have an average height of 19 feet. The interstate will increase in height along the portion adjacent to the Old Northside Historic District, beginning with the bridge over Alabama Street, where there is no increase, to a 14-foot increase of the I-65 northbound bridge over College Avenue. The greatest height increases will be farther from the historic district boundary because the existing bridge over College Avenue, which is for the I-70 exit to Pennsylvania Street and is closest to the district, will be removed. Overhead utility lines that cross over the interstate will likely need to be raised to add vertical clearance over I-65; this may require relocation of the utility lines and/or replacement of wood poles with steel poles. The existing 110-foot tall steel utility pole located east of the Morris-Butler House may require relocation.

Permanent traffic changes are anticipated to be minor near and within this district. The largest permanent increase in total vehicles in the peak hour is 79 on 16th Street, which equates to a density (total volume rate change) increase of 0.3 vehicle/minute/lane. Temporary increases in heavy trucks during construction are anticipated to range from zero to nine heavy trucks on 16th Street in the peak hours near this property. There are no contributing features, such as brick streets or stone curbs on the streets with anticipated temporary heavy truck increases within or near the district. Adverse effects are not anticipated from temporary or permanent traffic increases.

The increased height of the interstate, removal of screening vegetation within the existing right-of-way that currently partially blocks views of the interstate, closer edge of pavement, and installation of a retaining wall will affect the characteristics that qualify the Old Northside Historic District and the Morris-Butler House for the NRHP in a manner that would diminish their integrity. If a noise barrier is constructed, impacts to the integrity of the historic district will be greater. Although the interstate is an already existing intrusion on the integrity of the Old Northside Historic District, the project activities described above will make the intrusion more visible from within the district.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), apply to the Old Northside Historic District and the Morris-Butler House.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance." The

interstate is existing infrastructure within the vicinity of the historic district and building. Traffic is not anticipated to increase in the immediate vicinity of the Morris-Butler House, and temporary or permanent traffic increases will not diminish the integrity of the characteristics that qualify the historic district for the NRHP. The undertaking will not change physical features that contribute to the historic significance of the historic district within its setting, nor will the undertaking result in a change of use of the historic district or building.

Per 36 CFR 800.5(a)2(v), the undertaking will result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Although the interstate is an already existing intrusion on the setting of the Old Northside Historic District and the Morris-Butler House, the project activities described above will make the intrusion more visible from within the district. A noise barrier, if constructed, will result in a greater adverse effect.

As a result, the undertaking will have an Adverse Effect on the Old Northside Historic District and the Morris-Butler House.

Saint Joseph Neighborhood Historic District (NR-0926)

The Saint Joseph Neighborhood Historic District is six feet away from proposed sidewalk improvements along Delaware Street near the existing entrance ramp to the interstate. The proposed edge of pavement of the interstate will be located between approximately 8 and 20 feet closer to the historic district. The interstate pavement will be 20 feet closer at the district’s eastern edge. The proposed interstate edge of pavement will be approximately 55 feet from the historic district boundary at that location.

As a result of the undertaking, the Delaware Street entrance ramp to the interstate will be as much as four feet taller than the existing ramp at the Central Avenue bridge. Additionally, the Central Avenue bridge will be replaced. The present sideslope will be converted to a retaining wall, vegetation could be removed from within the right-of-way, and a noise barrier, which, if built, will have an average height of 15 feet, may be built atop the road between Alabama Street and College Avenue. Overhead utility lines that cross over the interstate will likely need to be raised to add vertical clearance over I-65; this may require relocation of the utility lines and/or replacement of wood poles with steel poles. Adverse effects are not anticipated from temporary or permanent traffic increases.

The interstate edge of pavement will be closer to the district and this increased proximity, together with the combined height of the retaining wall, results in a visual change from existing conditions. Although the interstate is an already existing intrusion on the integrity of the Saint Joseph Neighborhood Historic District, the increased proximity and height of the interstate will make the interstate appear to be a more pronounced intrusion for observers within the district. As a result, the proposed undertaking will have an impact on the characteristics that qualify the Saint Joseph Neighborhood Historic District for the NRHP in a manner that will diminish its integrity. If a noise barrier is constructed, impacts to the integrity of the historic district will be greater.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), apply to the Saint Joseph Neighborhood Historic District.

Per 36 CFR 800.5(a)2(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.” The undertaking will not be within the historic district’s boundary. Features within the historic district’s setting that contribute to its historic significance will not be physically impacted. Permanent traffic changes and

temporary increases in heavy truck traffic are anticipated to be minor near and within this district. 10th Street is paved with brick and has remnants of limestone curbs between Delaware Street and Central Avenue, but no heavy trucks are anticipated on this portion of 10th Street during construction.

Per 36 CFR 800.5(a)(2)(v), the undertaking will result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” Although the interstate is an already existing intrusion on the integrity of the Saint Joseph Neighborhood Historic District, the project activities described above will make the intrusion more visible from within the district. A noise barrier, if constructed, will result in a greater adverse effect.

Therefore, the undertaking will have an Adverse Effect on the historic district.

Chatham-Arch Historic District (NR-0327)

The Chatham-Arch Historic District is approximately 67 feet from the proposed edge of pavement of the interstate at the historic district’s north end. As part of the undertaking, the I-65 southbound (SB) ramp to I-70 eastbound (EB) will be reconstructed. The reconstruction will move the edge of pavement as much as 12 feet closer to the historic district, and the new ramp will be as much as approximately 22 feet taller than the existing road, supported in part by a new retaining wall from east of Alabama Street to the interchange. A noise barrier, averaging 15 feet tall, may be constructed on the south side of I-65 above the road between Alabama Street and College Avenue, producing a total height increase of approximately 37 feet. The reconstruction also could remove existing vegetation within the right-of-way of the interstate. The I-65/I-70 bridges over 10th Street and St. Clair Street will be replaced, with the new bridges 3 to 4 feet taller than the existing bridges, but without a significant change in location or length. Overhead utility lines along the north side of 10th Street will need to be raised to add vertical clearance over I-65; this may require relocation of the utility lines. Adverse effects are not anticipated from temporary or permanent traffic increases.

The proposed undertaking will result in impacts to the district’s setting due to the closer distance between the undertaking and the historic district, the increased height of the bridges and the interstate, and, if constructed, the added height of the noise barrier. The interstate is an already existing intrusion on the integrity of the Chatham-Arch Historic District, but the district’s increased proximity to I-65 following construction and the increased height of the bridges and the interstate will make the new interstate a more pronounced intrusion from within the district. Project activities will affect the characteristics that qualify the Chatham-Arch Historic District for listing in the NRHP in a manner that will diminish the district’s integrity. If a noise barrier is constructed, impacts to the integrity of the historic district will be greater.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), apply to the Chatham-Arch Historic District.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.” The undertaking will not be within the boundary of the historic district. Features that contribute to the historic significance of the historic district within its setting will not be physically impacted. Permanent traffic changes and temporary increases in heavy truck traffic are anticipated to be minor near and within this district. There are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a

change in the use of the district and will not impact physical features within the historic district's setting that contribute to its historic significance.

Per 36 CFR 800.5(a)(2)(v), the undertaking will result in the "Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features." Although the interstate is an already existing intrusion on the integrity of the Chatham-Arch Historic District, the project activities described above will make the intrusion more visible from within the district. A noise barrier, if constructed, will result in a greater adverse effect.

As a result, the undertaking will have an Adverse Effect on the historic district.

Massachusetts Avenue Commercial Historic District (NR-0525)

The Massachusetts Avenue Commercial Historic District is 67 feet from the proposed edge of pavement of the interstate at its closest point. The proposed edge of pavement of the interstate will not be closer to the district boundary than the existing edge of pavement of the interstate. The I-65/I-70 bridges over 10th Street will be replaced with the closest new bridge over 10th Street approximately 3 to 4 feet taller than the existing bridge and shifted to the east between 70 feet at the north end to approximately 15 feet at the south end. In the vicinity of Massachusetts Avenue, the proposed interstate will range from two to four feet higher than the existing interstate. A noise barrier may extend from 10th Street south to outside of the Massachusetts Avenue Commercial Historic District. The noise barrier would be approximately 19 feet tall, measuring from the proposed interstate height, for a total increase in height of up to 23 feet in the vicinity of the Massachusetts Avenue Commercial Historic District. Overhead utility lines that cross over the interstate will need to be raised to add vertical clearance over I-65; this may require relocation of the utility lines and/or replacement of wood poles with steel poles. Adverse effects are not anticipated from temporary or permanent traffic increases.

The maximum increase in noise for the Massachusetts Avenue Commercial Historic District is predicted to be 3.7 dB(A). This is a busy, commercial district and noise would not be unexpected there. Because the change in noise levels would be just at the threshold of human perception and within a busy commercial area, the integrity of the historic resources would not have the potential to be diminished by the project.

If the noise barrier is not constructed, the proposed undertaking will result in minor impacts to the district's setting due to the increased height of the I-65 SB to I-70 ramp, as well as the bridges over 10th and St. Clair streets. However, the interstate is an already existing intrusion on the integrity of the Massachusetts Avenue Commercial Historic District and the project activities described above will not make the intrusion more visible from within the district because the scale of the height difference will be minimal. As a result, these project activities will not have an impact on the characteristics that qualify the Massachusetts Avenue Commercial Historic District for the NRHP in a manner that would diminish its integrity.

If constructed, the possible noise barrier would result in additional impacts to the district's setting due to the height of the noise barrier combined with the increased height of the interstate. A small portion at the northeast end of the Massachusetts Avenue Commercial Historic District is adjacent to the proposed project area and the proposed noise barrier. Although the interstate is an already existing intrusion on the integrity of the historic district, the addition of a noise barrier in this location will make the intrusion more visible from within the district. Therefore, the addition of a noise barrier in this location would affect the characteristics that qualify the Massachusetts Avenue Commercial Historic District for listing in the NRHP in a manner that would diminish the district's integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), will apply to the Massachusetts Avenue Commercial Historic District if a noise barrier is constructed. If a noise barrier is not constructed, then an adverse effect will not occur.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.” The undertaking will remain outside the boundary of the historic district. Features within the historic district’s setting that contribute to its historic significance will not be physically impacted. Permanent traffic changes and temporary increases in heavy truck traffic are anticipated to be minor near and within this district. There are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district’s setting that contribute to its historic significance.

Per 36 CFR 800.5(a)(2)(v), the undertaking will result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features,” if a noise barrier is constructed. The interstate is an existing intrusion within the setting of the historic district, but the project activities described above will not increase the intensity of the existing visual intrusion, unless the noise barrier is constructed. The effect of the installation of a noise barrier will diminish the historic district’s integrity of setting and result in an Adverse Effect to the historic district. If a noise barrier is not constructed, then the effect of the undertaking on the historic district will not be adverse.

The recommended finding of Adverse Effect is based on the potential installation of the noise barrier. An updated effect finding will not be made if the noise barrier is not installed. However, any proposed mitigation tailored to address effects of the noise barrier will only be implemented if the barrier is installed.

Lockerbie Square Historic District (NR-0853 and NR-2030)

The Lockerbie Square Historic District is approximately 44 feet from the proposed edge of pavement at the Michigan Street exit ramp (north of Michigan Street) at its closest point. In the area where the interstate is nearest to the historic district, the interstate edge of pavement will not be any closer to the district than it currently is. Within the vicinity of the historic district, bridges over Michigan, Vermont, and New York streets will be replaced with taller bridges. A noise barrier may be constructed on top of the proposed new interstate, with an average height of 19 feet measuring from the proposed taller interstate, for a maximum total increase in height of 27 feet.

Minor traffic changes are anticipated along Michigan Street, which borders the northern edge of the historic district. The traffic analysis showed a density (total volume rate change) increase of 3.1 vehicles/minute/lane during the AM peak hour for Michigan Street. The increase in traffic may be perceptible during the AM peak period, but the forecasted traffic is still anticipated to be under capacity for Michigan Street. The change in traffic does not rise to a level that would diminish the district’s historic integrity. Adverse effects are not anticipated from temporary or permanent traffic increases.

If the noise barrier is not constructed, the project activities, including the distance between bridges and the historic district and the minimal height increases of the interstate east of the district, will make the intrusion only slightly more visible from within the district. As a result, these project activities will not have

an impact on the characteristics that qualify the Lockerbie Square Historic District for the NRHP in a manner that would diminish its integrity.

If constructed, the possible noise barrier would result in additional impacts to the district's setting due to the height of the noise barrier combined with the anticipated taller bridges. Although the interstate is an already existing intrusion on the integrity of the Lockerbie Square Historic District, the addition of a noise barrier in this location will make the intrusion more visible from within the district. As a result, the addition of a noise barrier in this location would affect the characteristics that qualify the Lockerbie Square Historic District for the NRHP in a manner that would diminish its integrity.

The criteria of adverse effect, as described in CFR 800.5(a)(1) and CFR 800.5(a)(2), apply to the Lockerbie Square Historic District if a noise barrier is constructed. If a noise barrier is not constructed, then an adverse effect will not occur.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the "Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance." The undertaking will remain outside the boundary of the historic district. Features within the historic district's setting that contribute to its historic significance will not be physically impacted. Permanent traffic changes and temporary increases in heavy truck traffic are anticipated to be minor near and within this district, except along Michigan Street during peak periods. However, the density increase in permanent traffic along Michigan Street will remain within the volume capacity of the road. There are no contributing features, such as brick streets or stone curbs, on the streets with anticipated temporary heavy truck increases within or near the district. Traffic impacts will not force a change in the use of the district and will not impact physical features within the historic district's setting that contribute to its historic significance.

Per 36 CFR 800.5(a)(2)(v), the undertaking will result in the "Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features," if a noise barrier is constructed. The interstate is an existing intrusion within the setting of the historic district, but the project activities described above will not increase the intensity of the existing visual intrusion, unless the noise barrier is constructed. Although the interstate is an existing intrusion within the setting of the historic district, the cumulative effect of the installation of a noise barrier will further diminish the historic district's integrity of setting and result in an Adverse Effect to the historic district. If a noise barrier is not constructed, then the effect of the undertaking on the historic district will not be adverse.

The recommended finding of Adverse Effect is based on the potential installation of the noise barrier. An updated effect finding will not be made if the noise barrier is not installed. However, any proposed mitigation tailored to address effects of the noise barrier will only be implemented if the barrier is installed.

CONDITIONS OR FUTURE ACTIONS TO AVOID, MINIMIZE OR MITIGATE ADVERSE EFFECTS

Avoidance and Minimization Efforts

INDOT has made efforts throughout the North Split Project development process to avoid and minimize impacts of the project on historic properties.

System-Level Analysis

As a result of public input at the onset of the project, INDOT conducted a System-Level Analysis to assess the performance, cost, and impact of seven large-scale concepts for I-65 and I-70 through downtown Indianapolis. Although not required as part of the NEPA process or Section 106 consultation, the purpose of the analysis was to define the scope of the North Split interchange project, as well as inform current public dialogue about the future of the downtown interstates. The System-Level Analysis determined:

- The North Split interchange should tie in with the existing interstate system;
- An environmental study for improvements to the North Split interchange study should move forward, with the scope of the project to be defined through that study process;
- Project-level alternatives for improving the North Split interchange would be developed to best meet the project purpose and need while minimizing impacts to the surrounding environment; and
- Comments on the System-Level Analysis would be considered in developing the project-level alternatives for the North Split Project, and efforts would be made to minimize the project footprint and incorporate other measures to respond to community concerns.

The results of the System-Level Analysis were published in a report released on May 3, 2018 and were presented to project working groups, including Section 106 consulting parties, during May and early June 2018. A public open house was held to present the results of the System-Level Analysis on May 23, 2018, and public comments were accepted through June 14, 2018.

Alternatives Development and Analysis

INDOT published a project-level Alternatives Screening Report in September 2018. This report identified Alternative 4c as INDOT's preliminary preferred alternative for the North Split Project. Alternative 4c was identified as the preliminary preferred alternative because it would not require additional right-of-way, would address the top four safety concerns within the interchange, and would minimize the need for widening the interstate. Alternative 4c would not add through lanes to the interstate system, which was identified as a notable public concern with the project. It also would eliminate or minimize the need for retaining walls along the interstate legs. Finally, Alternative 4c would result in a more compact interchange, moving some interchange ramps farther away from the Old Northside and Chatham-Arch Historic Districts.

The Alternatives Screening Report was available for consulting party and public comment from September 28, 2018 through November 3, 2018. Following the public comment period for the screening report, INDOT made refinements to Alternative 4c to address the feedback received. As currently proposed, Refined Alternative 4c, which will include the above-mentioned benefits of Alternative 4c, will reconstruct the North Split interchange to correct safety concerns as well as replace the bridges and pavement throughout the project area. The top two safety concerns—weaves at the Pennsylvania Street exit ramp and the Delaware Street entrance ramp—will be eliminated in Refined Alternative 4c. The need for pavement widening and retaining walls will be minimized, but some interstate access to and from downtown will be reduced. Westbound traffic from I-70 will no longer be able to exit at the Pennsylvania

Street ramp on the north side of downtown. Southbound I-65 traffic will be able to access the collector-distributor (C-D) road as they do now, but movements from the Delaware Street ramp will only connect with I-70 eastbound. Traffic entering at Delaware Street will no longer have access to I-65 southbound or to the C-D road. All other movements in the North Split interchange area will remain.

Noise

Noise has been a concern raised by consulting parties since the onset of the North Split Project. To address this concern in part, INDOT is committed to using continuous reinforced concrete pavement. This paving technique eliminates the need for transverse joints, which are the cause of rhythmic sound patterns of tires passing over traditional concrete roadways. The North Split Project will also replace most of the existing bridges with jointless concrete bridges. This design eliminates the open joints at the end of bridges, which are the cause of the “banging” sounds typically heard at older bridges such as those currently existing in the project area.

The project will also use “Next Generation Grooving” on the pavement. This new paving technique is designed specifically to reduce tire noise through the use of longitudinal grooves. Although results vary based on tire manufacturer, existing pavement type and condition, and other factors, recent studies have shown that next generation pavement can reduce tire noise levels by 3 to 5 decibels (or more).

A traffic noise analysis was completed in accordance with the INDOT Traffic Noise Analysis Procedure. The INDOT noise policy, which was approved by FHWA, describes INDOT’s implementation of the federal noise regulations found under 23 CFR 772. The purpose of the traffic noise analysis was to identify predicted traffic noise impacts and, where appropriate, abatement measures. Based on this study, most historic properties show a slight decrease in noise or predicted increases less than 3 dB(A). These types of changes are not unexpected due to construction of concrete safety barriers, which can provide some noise reduction, changes in roadway geometry (some interchange ramps will be located farther from historic districts), and lack of substantial increases in modeled traffic volumes. According to FHWA, noise increases of 3 dB(A) or less are “barely detectible by the human ear.” The only value in the table over 3 dB(A) was the maximum value in the range for the Massachusetts Avenue Commercial Historic District of 3.7 dB(A). The low end of the range for that district was -0.5 dB(A). This is a busy, commercial district and noise would not be unexpected there. Because the change in noise levels would be just at the threshold of human perception and within a busy commercial area, the integrity of the historic resources would not have the potential to be diminished by the project. Therefore, no adverse effects to historic properties are anticipated from changes in highway traffic noise as a result of the project.

Vibration

Based on the proximity of the historic property to construction activities, effects from vibration are possible. Vibration impacts could occur in residential areas and at other vibration-sensitive land uses from activities associated with construction of the project, such as excavation, demolition, and vibratory compaction, as well as pile-driving at bridges, possible noise walls, and retaining walls. The potential for vibration impact would be greatest at locations near pile-driving for bridges and other structures, pavement demolition for removal, and vibratory compactor operations.

In order to address these possible effects, the contractor will be required to prepare a construction Vibration Monitoring and Control Plan. This plan includes pre-construction surveys of historic buildings, monitoring vibration during construction, post-construction surveys, and keeping the public informed of construction activities known to be a source of vibration. The contractor will also be required to keep vibration levels under maximum damage risk thresholds in the vicinity of historic properties. Because the

contractor will be required to keep vibration levels under the maximum damage risk thresholds, no adverse effects to historic properties are anticipated from construction-induced vibration.

The new concrete pavement will also be smoother, which will reduce potential sources of highway traffic-induced vibration.

Context Sensitive Solutions (CSS) Process

Context Sensitive Solutions (CSS) is a collaborative, interdisciplinary decision-making process and design approach that involves all stakeholders to develop a transportation facility that fits its physical setting. INDOT has embarked on a robust CSS process for the North Split Project. The CSS process for the project includes three main parts: Visioning, Preliminary Design Treatments, and Design Guidelines Package. During the Visioning stage, six neighborhood meetings were held in March and April 2019 to obtain community feedback on what types of project elements were important to them. During the Preliminary Design Treatments stage, six neighborhood meetings and one public open house were held in July and August 2019 to obtain community feedback on possible design options and additional opportunities that were developed in response to the Visioning stage. Possible design options included elements such as abutment walls, piers and columns, retaining walls, lighting, public art space, landscape, vegetation, and side slope treatments. Other additional opportunities including improving local connectivity and open space enhancements were also presented for community feedback in the Preliminary Design Treatments stage. Some of the design options and opportunities would require local partnerships, such as maintenance agreements. INDOT is currently determining which design treatments and additional opportunities will be incorporated in the North Split Project.

Section 106 Mitigation Ideas

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

A. Tree Preservation and Plantings

- a. Adjacent to the Old Northside Historic District and Morris Butler House, a Do Not Disturb Area will be identified along the north side of I-65 from College Avenue to Alabama Street in order to preserve some existing trees. The design-build contractor will only be allowed to install new drainage connections (to existing pipes) in this area. No clearing of trees 2-inch diameter at breast height (dbh) or greater is allowed in the Do Not Disturb Area. The Design-build Contractor will have 15 feet north of the retaining wall to work; everything north of that will be a Do Not Disturb Area. Trees shall be preserved in this Do Not Disturb Area. This will result in a slightly taller retaining wall in order to tie back down to the existing slope, but greater shielding will be provided with existing vegetation.
- b. Shrubs will be planted in the 15-foot disturbed area along the north side of I-65 from College Avenue to Alabama Street between the retaining wall and Do Not Disturb Area.
- c. Adjacent to the Saint Joseph Neighborhood Historic District, a Do Not Disturb Area will be identified along the south side of the Delaware entrance ramp between Delaware Street and Alabama Street in order to preserve some existing trees. The design-build contractor will only be allowed to install new drainage connections (to existing pipes) in this area. No clearing of trees 2-inch dbh or greater is allowed in the Do Not Disturb Area. This will result in a short retaining wall in this area in order to tie back down to the existing slope, but greater shielding will be provided with existing vegetation.

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

B. Connectivity Improvements

- a. To improve connectivity between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements will be made to the Alabama Street underpass. Improvements include new lighting on the bridge and signage along Alabama Street identifying each neighborhood.
- b. To improve connectivity between the Old Northside and Saint Joseph Neighborhood Historic Districts, improvements will be made to the Central Avenue underpass. Improvements include a wider bridge opening (65 feet to at least 76 feet), wider sidewalks, new lighting on the bridge, vertical bridge walls, elimination of drainage from the bridge above on to the street and sidewalks, and space for murals.
- c. To improve connectivity between the Old Northside and Chatham-Arch Historic Districts, improvements will be made to the College Avenue underpass. Improvements include wider bridge openings (79 feet to at least 87 feet), wider sidewalks, new lighting on the bridge, vertical bridge walls, elimination of drainage on to the street and sidewalks, and space for murals.
- d. Funding for a portion of and possible right-of-way use for the Old Northside Connector, a pedestrian and bicycle path to connect the alley south of the Benjamin Harrison Presidential Site to Pennsylvania Street. This item is contingent upon a maintenance agreement with the Benjamin Harrison Presidential Site to maintain the Connector. The Old Northside Connector would not be open to vehicular traffic.
- e. A temporary detour will be required for the Monon Trail during construction. The detour will be 10-feet wide and compliant with the Americans with Disabilities Act (ADA). The detour will reconstruct a portion of the Old Northside Trail in the O'Bannon Soccer Park

and divert onto INDOT property before connecting to College Avenue. The trail will pass under College Avenue and divert to the southeast on INDOT property to connect to existing sidewalk across 10th Street from the Cultural Trail. The portion of the detour within the O'Bannon Soccer Park, within INDOT right-of-way west to College and under the College Avenue bridges will remain as a permanent feature to improve connectivity between the Old Northside and Chatham-Arch Historic Districts.

- f. To protect the brick portion of 10th Street, "No Construction Traffic" and "Local Traffic Only" signs will be installed at the entrance to the brick portion of 10th Street from Delaware Street to Central Avenue.

C. Education/Interpretation/Community Outreach

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

D. Vibration

- a. The Design-build Contractor shall develop a Vibration Monitoring and Control Plan. The plan should at least include all buildings within historic properties or districts within 140 feet of project construction activities. The Plan will include the following key elements:
 - i. Identifying buildings that are sensitive to vibration;
 - ii. Conducting pre-construction surveys of residences, historic buildings, and other vibration-sensitive structures in the project corridor to determine the appropriate vibration limits for the type of structure and conditions of the structure;
 - iii. Developing and implementing a vibration monitoring program for construction activities;
 - iv. Conducting post-construction surveys;
 - v. Phasing construction activities that create vibration so that multiple sources of vibration do not occur at the same time;
 - vi. Prohibiting or limiting certain activities that create higher vibration levels during specific nighttime hours;
 - vii. Developing a method for responding to community complaints; and
 - viii. Keeping the public informed of proposed construction schedules, and identifying activities known to be a source of vibration.

- b. Maximum thresholds for historic properties that the plan must meeting are shown in Table 5. The values are presented in terms of peak particle velocity (PPV), the accepted method for evaluating the potential for damage.

Table 5. Construction Vibration Thresholds (PPV)

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

- c. Consulting parties will be provided the Vibration Monitoring and Control Plan for a 30-day review period. The design-build contractor will be required to respond to consulting party comments.
- d. In the event vibration damage does occur, the Design-build Contractor will be responsible for the cost and repair of any vibration damage to historic properties. Any repairs shall be coordinated with the SHPO to ensure they are carried out in accordance with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. This will be contingent on property owners allowing pre and post construction surveys of their buildings.
- e. Where access to privately owned property is necessary for monitoring or damage repair, consent shall be obtained prior to entry.

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

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

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

5. SUMMARY OF CONSULTING PARTIES AND PUBLIC VIEWS

The following is a summary of the views of consulting parties. A current list of consulting parties is included in Appendix D. Consulting party meeting presentations and minutes are included in Appendix E. Comments from consulting parties and responses to those comments are included in Appendices F–N.

Below is a timeline of Section 106 consultation for the North Split Project.

August 28, 2017 – Phase Ib Archaeology Work Plan hand-delivered to SHPO for review (Appendix F).

August 29, 2017 – SHPO sends letter indicating Phase Ib Archaeology Work Plan is acceptable with conditions (Appendix F).

September 19, 2017 – Early coordination letter and Section 106 consultation consulting party invitation sent to the SHPO and 37 potential consulting parties. INDOT provided the same notification to the Tribes on the following day. The letter discussed the proposed project location, purpose and need, initial scope of work, and proposed APE; explained the Section 106 consultation process; and included an invitation to a consulting party meeting on October 6, 2017 (Appendix F).

October 6, 2017 – Consulting party meeting No. 1 was held at the Indiana Historical Society (Appendix E). Ten consulting parties attended in person or via phone. The purpose of the meeting was to discuss the project, the APE, and next steps in the Section 106 consultation process. Attendees were encouraged to provide written comments.

September 19 through October 22, 2017 – Consulting party comment period for early coordination letter/consulting party invitation. Responses to consulting party comments are included with Update Memo No. 1. The SHPO responded to the early coordination letter on October 19, 2017, indicating they had no additional consulting parties to suggest and would comment on the archaeological report and the HPR when received. Comments, including identification of additional consulting parties, were received from the consulting parties outside of the formal Section 106 comment period through May 3, 2018 (Appendices F and G).

October 26, 2017 – Meeting presentation slides and minutes from consulting party meeting No. 1 were sent to the consulting parties for their records. A reminder to respond to the email if recipients would still like to be considered a consulting party was included in the email (Appendix F).

January 8, 2018 – Update Memo No. 1 and the HPR were sent to the SHPO and consulting parties. INDOT provided the same notification to the Tribes on the same day. Update Memo No. 1 discussed the HPR and aboveground historic properties, upcoming archaeology report, traffic diversion and APE expansion methodology, updates to the project scope, responses to consulting party comments from the previous comment period, and included an invitation to consulting party meeting No. 2 on January 26, 2018 (Appendix G).

January 26, 2018 – Consulting party meeting No. 2 was held at the Benjamin Harrison Home/Presidential Site (Appendix E). Forty-four consulting parties and members of the public attended in person or via phone. The purpose of the meeting was primarily to discuss the results of the HPR, provide an update on the archaeology component of the project, and review the traffic diversion and APE expansion methodology. Attendees were encouraged to provide written comments.

January 8 through February 28, 2018 – Consulting party comment period for Update Memo No. 1 and the HPR. Responses to consulting party comments are included with Update Memo No. 2 in Appendix I. The SHPO responded to Update Memo No. 1 and the HPR on February 8, 2018, indicating they concurred with the conclusions of the HPR regarding listed and eligible properties. The SHPO also accepted the methodology and proposed APE expansion due to temporary heavy truck traffic during construction (Appendix G).

April 24, 2018 – Consulting parties were notified via email of a System-Level Analysis report on the project's website. The System-Level Analysis was not a formal step in the North Split Section 106 consultation process. The System-Level Analysis investigated a range of concepts for the entire downtown Indianapolis interstate system. INDOT initiated the System-Level Analysis to assess the performance, cost, and impact of seven concepts for I-65 and I-70 through downtown Indianapolis. The information from the analysis did not make a final recommendation on the downtown interstate system, but the facts would inform the process moving forward for the North Split interchange. Consulting parties were also invited to a consulting party meeting No. 3 to learn more about the System-Level Analysis (Appendix G).

May 21, 2018 – Consulting party meeting No. 3 was held at the Indiana State Museum (Appendix E). Twenty-one consulting parties attended in person or via phone. The purpose of the meeting was primarily to discuss the results of the System-Level Analysis. Review of the System-Level Analysis and this meeting are not formal steps in the North Split Section 106 consultation process. They are included in this timeline for reference. Attendees were encouraged to provide written comments.

April 25, 2018 through June 7, 2018 – Comments were received from the consulting parties regarding the System-Level Analysis outside of the formal Section 106 comment period (Appendix H). Responses to consulting party comments are included with Update Memo No. 2 in Appendix I.

September 28, 2018 – Update Memo No. 2, Alternatives Screening Report, and HPR Addendum were sent to the SHPO and consulting parties. Update Memo No. 2 discussed the availability of the Alternatives Screening Report, the expanded APE and historic properties, and responses to consulting party comments from the previous comment period, and included an invitation to a consulting party meeting No. 4 on October 17, 2018. The Alternatives Screening Report identified Alternative 4c as the preliminary preferred alternative (Appendix I).

October 17, 2018 – Consulting party meeting No. 4 was held at the Indiana Historical Society (Appendix E). Twenty consulting parties attended in person or via phone. The purpose of the meeting was primarily to discuss the project purpose and need, alternatives screening, and historic properties identified within the expanded APE. Attendees were encouraged to provide written comments.

September 28 through October 30, 2018 – Consulting party comment period for Update Memo No. 2, the Alternatives Screening Report, and HPR Addendum. Responses to consulting party comments are included with Update Memo No. 3 in Appendix J. The SHPO responded to Update Memo No. 2, the Alternatives Screening Report, and the HPR Addendum on October 29, 2018. The SHPO indicated concern about the loss of local access and encouraged INDOT to conduct a more detailed traffic analysis of city streets to ascertain local traffic impacts. They also mentioned it may be worth giving further consideration to Alternative 4B, which provides many of the minimization elements of Alternative 4c while also preserving local access for all existing ramps. The SHPO also concurred with the conclusions of the HPR addendum regarding eligibility and ineligibility of the resources within the expanded APE (Appendix I).

December 14, 2018 – Phase Ib Archaeological Records Check and Reconnaissance Survey report was submitted to SHPO and tribal consulting parties for review (Appendix I).

January 25, 2019 – SHPO provided comments on the Phase Ib Archaeological Records Check and Reconnaissance Survey report. SHPO states they have not identified any currently known archaeological resources listed in or eligible for the NRHP within the project area and concurred that site 12-Ma-1024, identified during the survey, does not appear eligible for the NRHP. SHPO agreed that no further archaeological investigations were necessary in the project area (Appendix I).

February 28, 2019 – Meeting with SHPO to discuss forecasted permanent traffic changes and recommendation to not expand the APE.

March 20, 2019 – Update Memo No. 3 sent to SHPO and consulting parties. Update Memo No. 3 discussed refinements made to preliminary preferred Alternative 4c, forecasted permanent traffic changes and the APE, and provided responses to earlier consulting party comments (Appendix J).

March 20, 2019 – Draft meeting minutes of the North Split Permanent Traffic Change Meeting on February 28, 2019 were sent to SHPO for review and comment (Appendix J).

March 25, 2019 – SHPO responded to the February 28 draft meeting minutes stating that the minutes accurately reflect what was discussed at the meeting (Appendix J).

March 20 through April 20, 2019 – Consulting party comment period for Update Memo No. 3. Responses to consulting party comments are included with Update Memo No. 5 in Appendix L. SHPO provided comments on Update Memo No. 3 on April 9, 2019. SHPO stated their understanding that some modifications were made to preferred Alternative 4C to minimize ramp closures and allow for greater interstate access, but that some permanent changes to traffic on local streets were still anticipated. SHPO believed that the impact of increases in vehicular traffic to historic properties needs to be considered and expressed appreciation for the level of thought and analysis put forth in quantifying permanent impacts outside the APE as it was currently defined. SHPO agreed with the assessment that minor expected increase in traffic along some arterial streets within primarily commercial areas of the city does not impact historic properties or necessitate an expansion of the APE, but that the issue would need to be revisited should the expected conditions change (Appendix J).

June 17, 2019 – Phase Ia Archaeological Records Check and Reconnaissance Survey report sent to SHPO for review (Appendix K).

June 18, 2019 – Update Memo No. 4 was sent to SHPO and consulting parties. Update Memo No. 4 included a review of the Section 106 consultation history, notification that an Effects Report was in process for aboveground historic properties, and advised the Phase Ia Archaeological Records Check and Reconnaissance Survey report was available for the Tribes' review. INDOT provided the same notification to the Tribes the following day (Appendix K).

July 18, 2019 – In response to the Phase Ia Archaeological Records Check and Reconnaissance Survey report, SHPO concurred that no currently known archaeological resources listed in or eligible for the NRHP were located in the project area and that no further archaeological investigations were necessary at the project area (Appendix K).

June 18 through July 19, 2019 – Consulting party comment period for Update Memo No. 4. Responses to consulting party comments are included in Update Memo No. 5 in Appendix L.

August 9, 2019 – Update Memo No. 5 and the Historic Property Assessment of Effects Report were sent to SHPO and consulting parties. INDOT provided the same notification to the Tribes on the same date. Update Memo No. 5 discussed the Historic Property Assessment of Effects Report, slight changes to project maps to more accurately depict historic district and property boundaries, responses to consulting party comments from the previous comment periods, and included an invitation to consulting party meeting No. 5 on August 29, 2019 (Appendix L).

August 29, 2019 – Consulting party meeting No. 5 was held at the Ivy Tech Culinary and Conference Center (Appendix E). Eight consulting parties attended in person or via phone. The meeting provided updates on the status of the Section 106 consultation process, provided an update on the archaeological surveys, discussed efforts to minimize effects to historic properties, discussed the methodology of the effects report, discussed the results of the assessment of effects, and introduced the consulting parties to the idea of mitigation of adverse effects and possible mitigation options. Attendees were encouraged to provide written comments.

August 9 through September 11, 2019 – Consulting party comment period for Update Memo No. 5 and the Assessment of Effects Report. Responses to consulting party comments are included in Update Memo No. 6 in Appendix M. SHPO provided comments on Update Memo No. 5 and the Assessment of Effects Report on September 11, 2019. SHPO states “we agree with your assessment of impacts to historic resources within the area of potential effects, and conclusion that the undertaking will adversely impact the Morris-Butler House, Old Northside Historic District, and Chatham-Arch Historic District. We are very concerned about the additional effects of noise barriers, should these be added to the project at a later time, and we understand that the report may be modified by addendum to analyze these impacts” (Appendix L).

October 11, 2019 – Update Memo No. 6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report were sent to SHPO and consulting parties. INDOT provided the same notification to the Tribes on the same date. Update Memo No. 6 discussed the traffic noise analysis, Traffic Noise Barrier Addendum, consulting party comments and effect finding recommendations, responses to consulting party comments from the previous comment period, and included an invitation to consulting party meeting No. 6 on October 29, 2019 (Appendix M).

October 29, 2019 – Consulting party meeting No. 6 was held at the Ivy Tech Community College Culinary and Conference Center (Appendix E). Eight consulting parties attended in person or via phone. The purpose of the meeting is to review the Traffic Noise Analysis and effects to historic properties, review the responses to consulting parties comments on the Assessment of Effects Report and the Traffic Noise Barrier Addendum, as well as to begin discussing possible mitigation ideas. Attendees were encouraged to provide written comments.

October 11 through November 11, 2019 – Consulting party comment period for Update Memo No. 6 and the Traffic Noise Barrier Addendum. Responses to consulting party comments are included in Appendix N. SHPO provided comments on Update Memo No. 6 and the Traffic Noise Barrier Addendum on November 1, 2019. SHPO concurred that the St. Joseph Historic District will be adversely affected by the undertaking. They also noted that additional adverse effects to historic properties may result from the potential construction of noise barriers within the project area (Appendix M).

November 7, 2019 – Update Memo No. 7 and the Phase Ia archaeology report addendum were sent to SHPO and consulting parties. INDOT provided the same notification to the Tribes on the same date. Update Memo #7 discussed one additional noise barrier (NB3W) and its potential effect. SHPO provided comments on the Phase Ia archeology report addendum on December 9, 2019. In their letter, SHPO concurred that no known archaeological resources listed in or eligible for inclusion in the NRHP within the additional portions of the proposed project area described in the archaeological report as Area 1, Area 2, Area 3, Area 4, Area 5, Area 6, and Area 7, and state “that no further archaeological investigations appear necessary in those areas.” Further, SHPO states that archaeological features at Site 12-Ma-1062, identified in the Phase Ia archaeology report addendum, “differ from those of known, similar features and/or historically documented examples.” In its letter, SHPO requests additional information, most notably relating to measurements of the identified features of the site, as well as more information regarding the differences between elements of the types of switching equipment presented in the report.

By letter dated December 13, 2019, the revised Phase Ia archaeology report addendum was submitted to SHPO. This revised report included the requested measurements, as well as additional discussion on the scale, location, and size of identified site elements. In addition, the interpretation of the switch function was clarified and emphasized. Finally, additional information regarding potential significance and NRHP-eligibility was included.

In its response dated December 16, 2019, SHPO states that “the portions of archaeological site 12-Ma-1062 that lie within Area 8 of the proposed project area do not appear to warrant additional archaeological investigation” but went on to request that portions of the site that lie outside the proposed project be clearly marked so that they are avoided by all ground-disturbing project activities.

Regarding the noise barrier (NB3W), SHPO states: “The consultant’s assessment that the NB3W barrier would not adversely affect the John Hope School appears reasonable based on the information at hand, unless another consulting party provides information to the contrary.” Responses to consulting party comments are included in Appendix N.

No other consulting party comments were received.

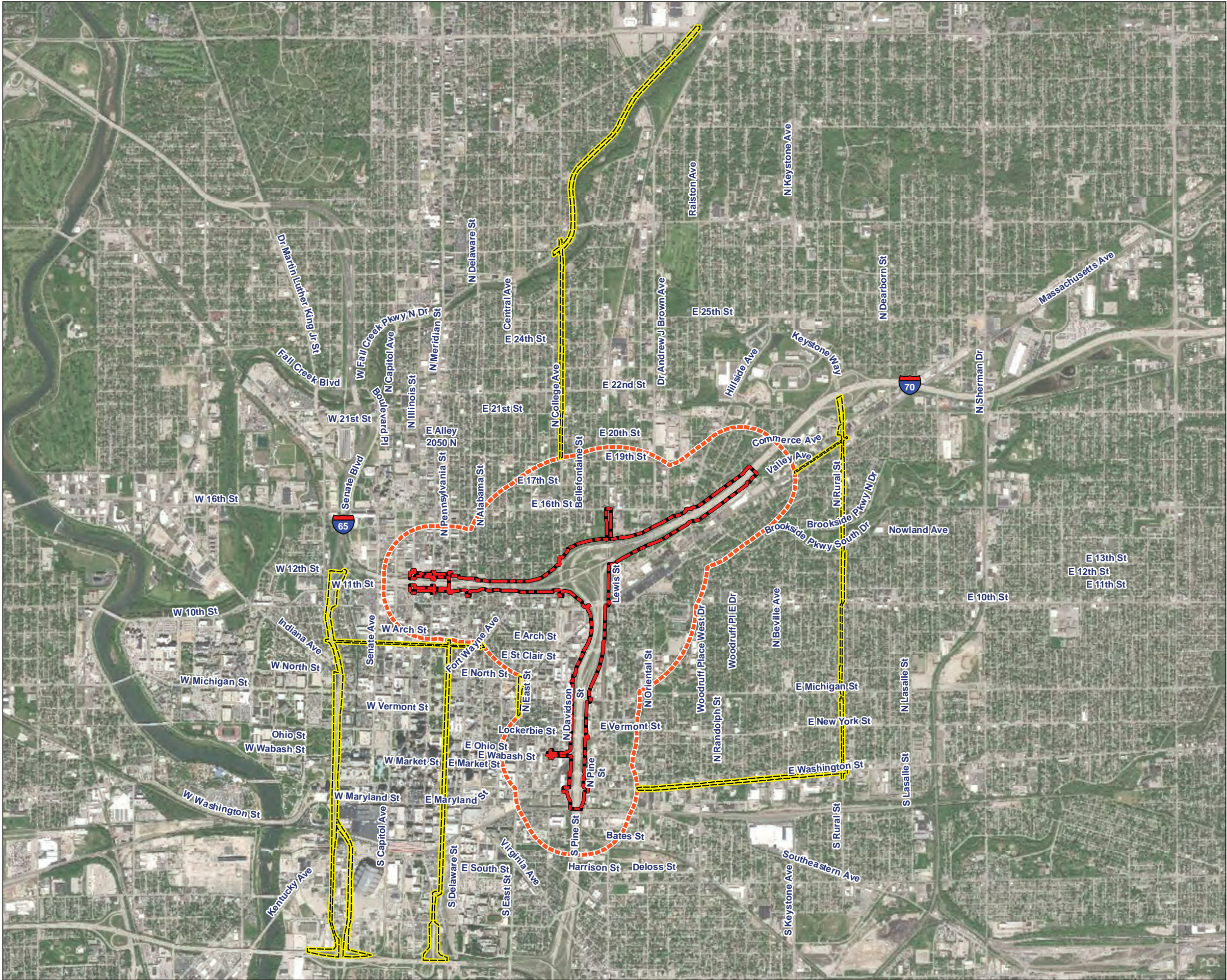
Additional information on consulting party responses is included in Appendices F through N.

A public notice will be published in a local newspaper and the public will be afforded thirty (30) days to respond. If appropriate, this document will be revised after the expiration of the public comment period.

APPENDICES

Appendix A:	Figures
Appendix B:	Photographs
Appendix C:	Abstracts and Summaries
Appendix D:	List of Consulting Parties
Appendix E:	Consulting Parties Meeting presentations and minutes
Appendix F:	Correspondence to or from consulting parties for the period August 29, 2017 through January 7, 2018, related to Early Coordination
Appendix G:	Correspondence to or from consulting parties for the period January 8, 2018 through May 2, 2018, related to Update Memo No. 1 and the HPR
Appendix H:	Correspondence to or from consulting parties for the period May 3, 2018 through September 27, 2018, related to the System-Level Analysis
Appendix I:	Correspondence to or from consulting parties for the period September 28, 2018 through March 19, 2019, related to Update Memo No. 2, HPR Addendum, and the Alternatives Screening Report
Appendix J:	Correspondence to or from consulting parties for the period March 20, 2019 through June 16, 2019, related to Update Memo No. 3
Appendix K:	Correspondence to or from consulting parties for the period June 17, 2019 through August 8, 2019, related to Update Memo No. 4
Appendix L:	Correspondence to or from consulting parties for the period August 9, 2019 through October 10, 2019, related to Update Memo No. 5 and the Historic Properties Assessment of Effects Report
Appendix M:	Correspondence to or from consulting parties for the period October 11, 2019 through November 11, 2019, related to Update Memo No. 6 and the Traffic Noise Barrier Addendum to the Assessment of Effects Report
Appendix N:	Correspondence to or from consulting parties for the period November 7, 2019 through December 17, 2019, related to Update Memo No. 7

APPENDIX A: FIGURES



- Expanded APE
- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE

Base: Aerial photograph 2016

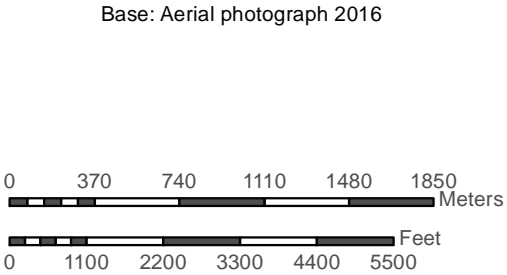
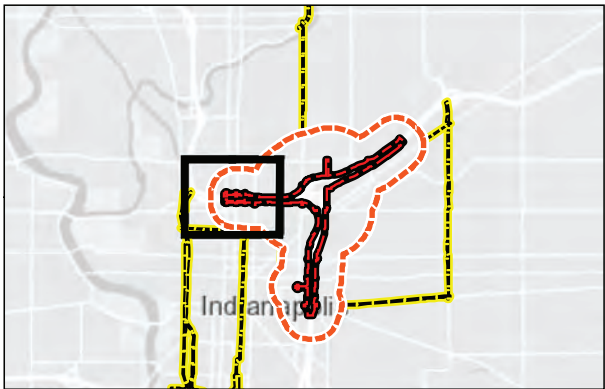
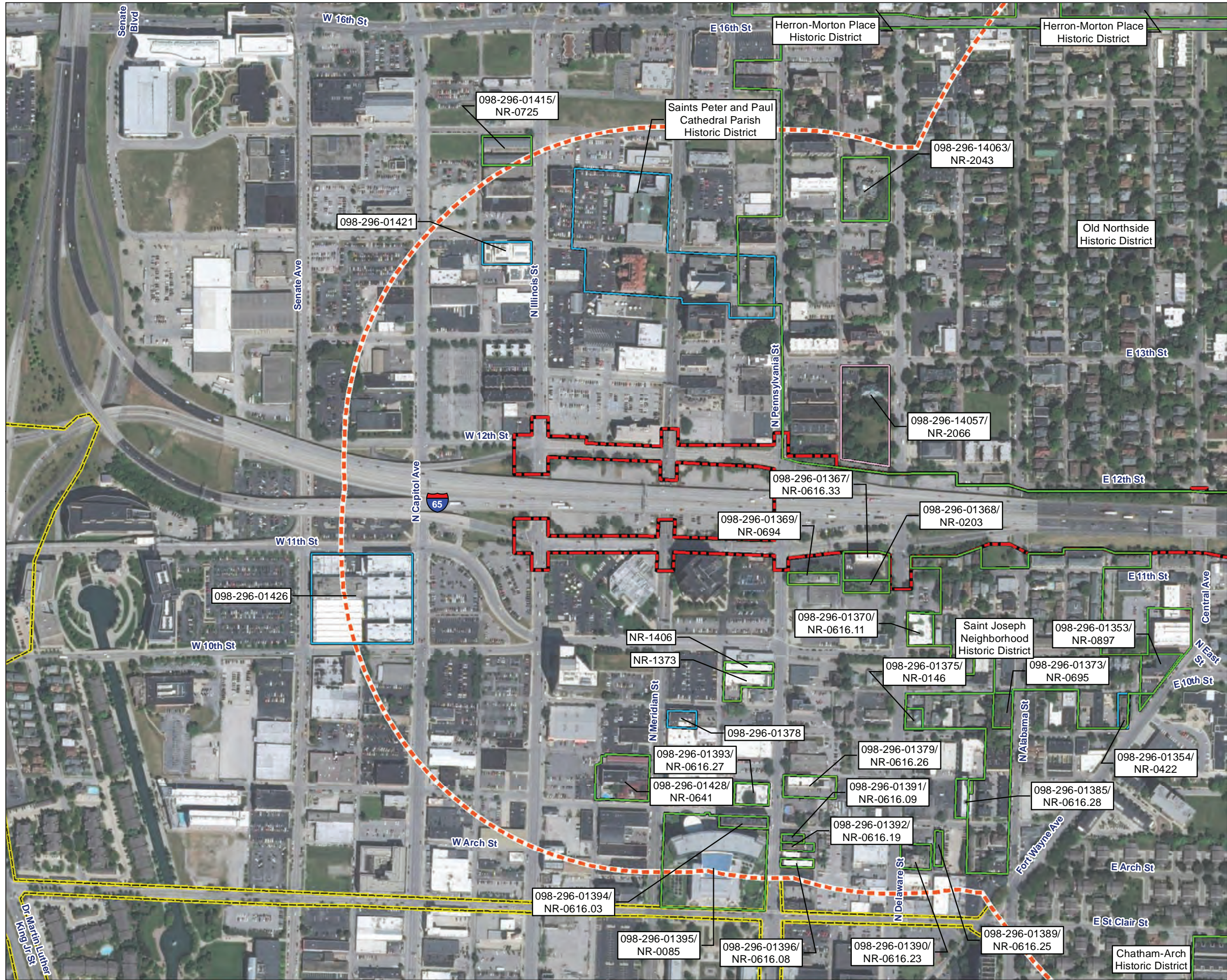


Figure 1
Aerial photograph showing the Expanded APE and project area for the I-65/I-70 North Split Interchange Project Expanded APE, Indianapolis, Marion County (Des. Nos. 1592385 and 1600808).



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NHL
- NRHP-listed
- NRHP-eligible

Base: Aerial photograph 2016

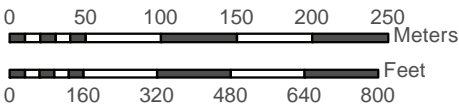
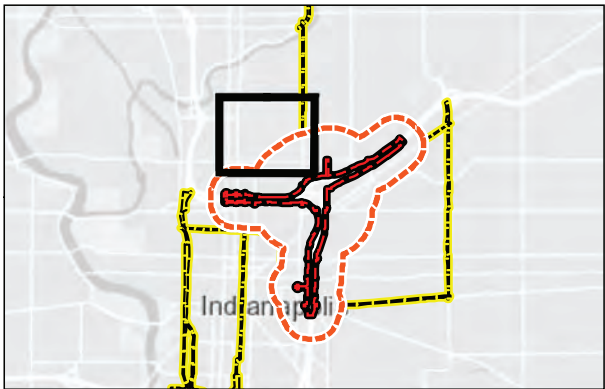
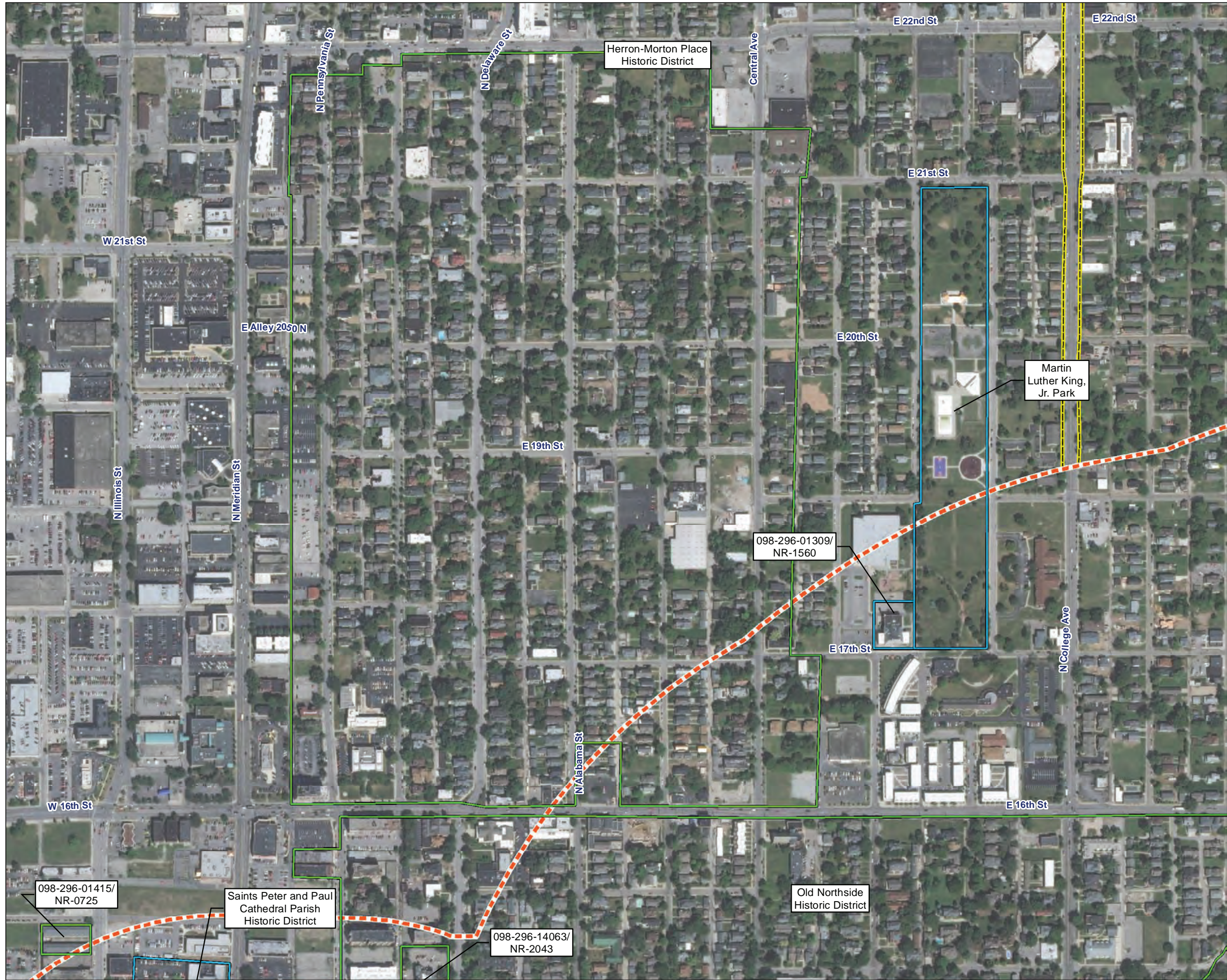


Figure 2 **Sheet 1 of 11**

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NRHP-listed
- NRHP-eligible

Base: Aerial photograph 2016

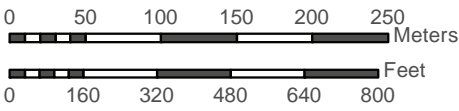
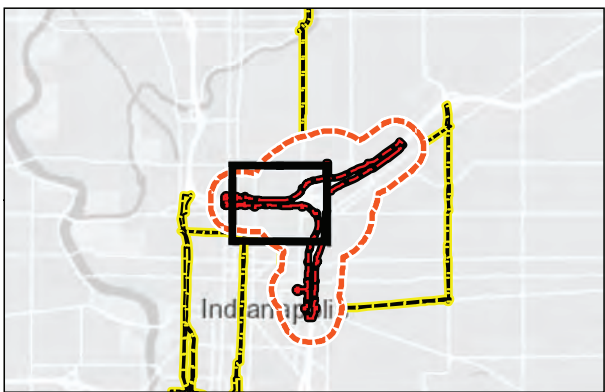
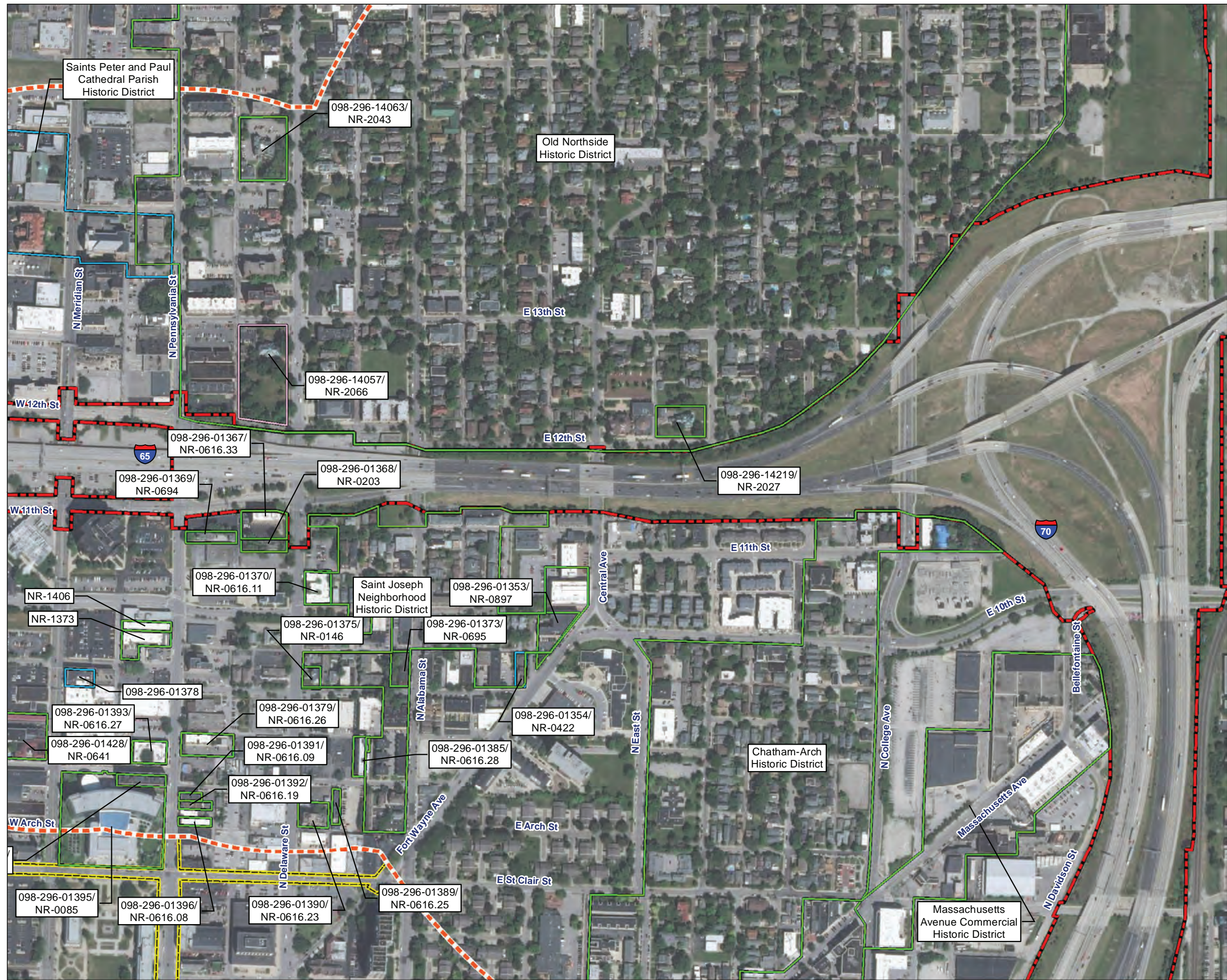


Figure 2 Sheet 2 of 11

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NHL
- NRHP-listed
- NRHP-eligible

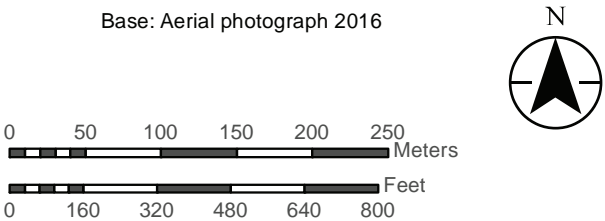
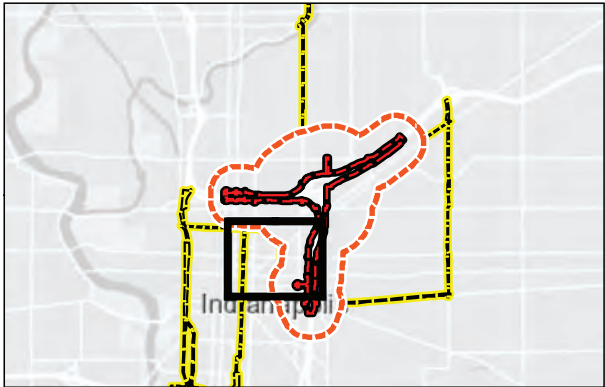
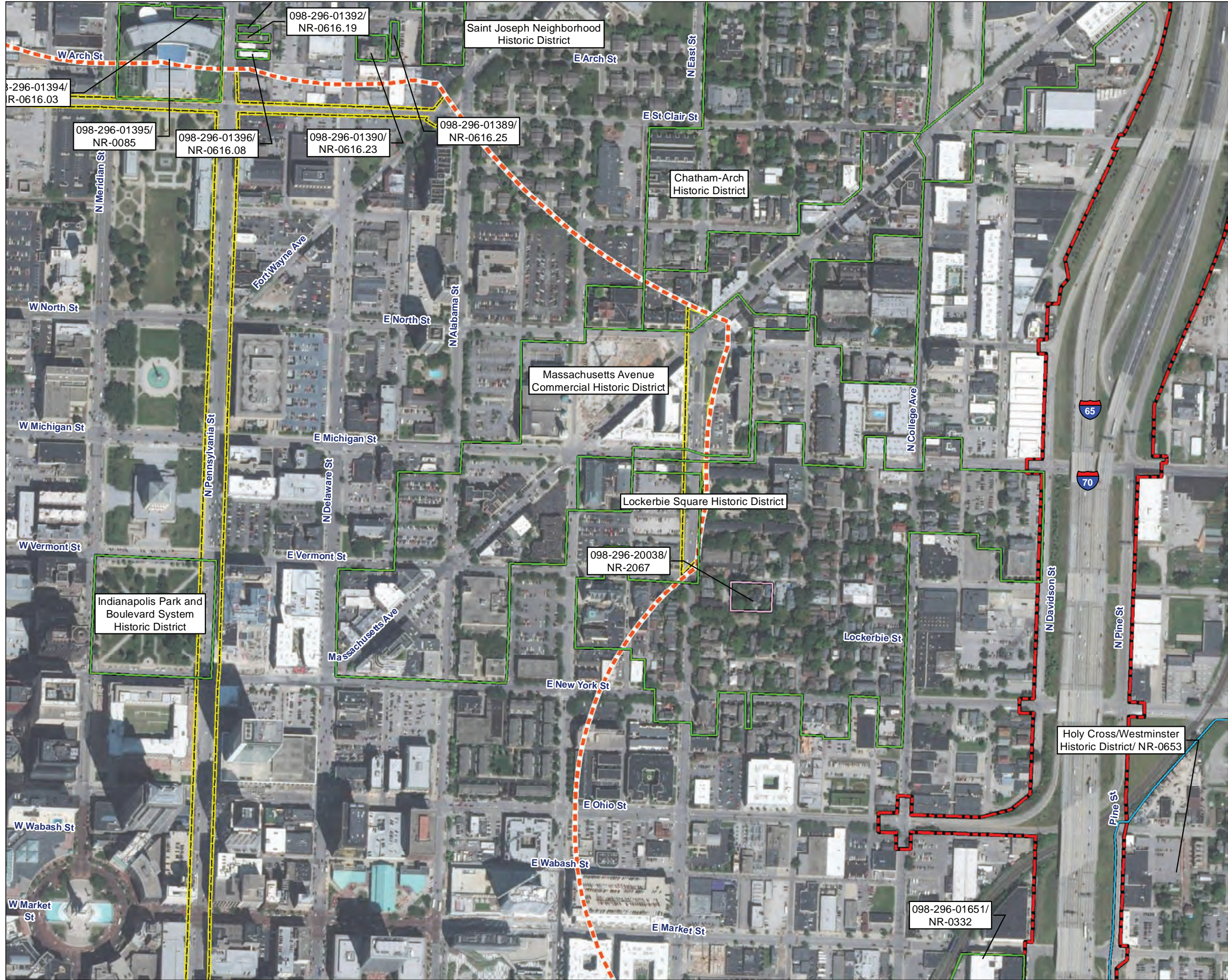


Figure 2 Sheet 3 of 11

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NHL
- NRHP-listed
- NRHP-eligible

Base: Aerial photograph 2016

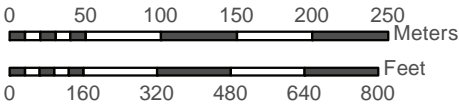
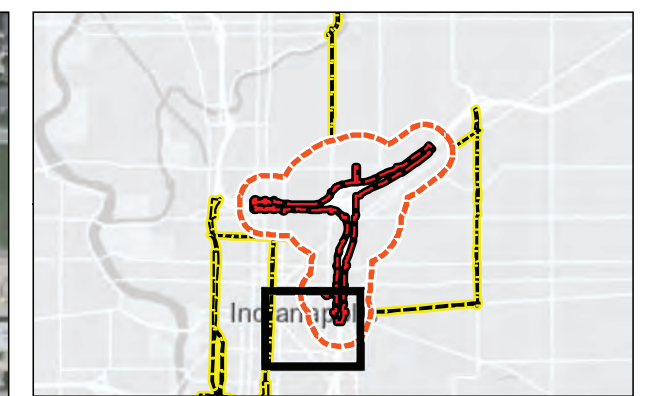







Figure 2 **Sheet 4 of 11**

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



-  I-65/I-70 North Split Interchange Reconstruction Project Area
-  I-65/I-70 North Split Interchange Reconstruction Project APE
-  Expanded APE (Temporary Traffic Diversion)
-  NRHP-listed
-  NRHP-eligible

Base: Aerial photograph 2016

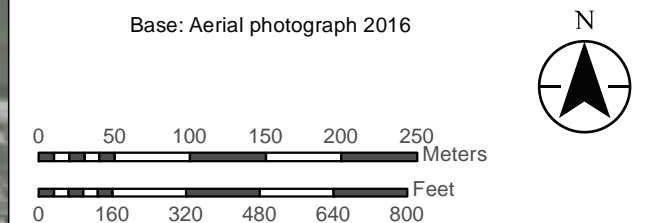
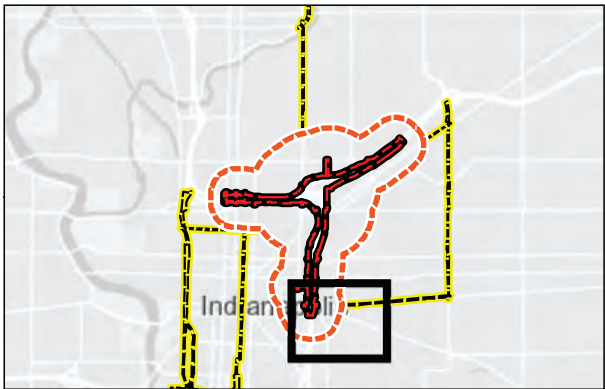
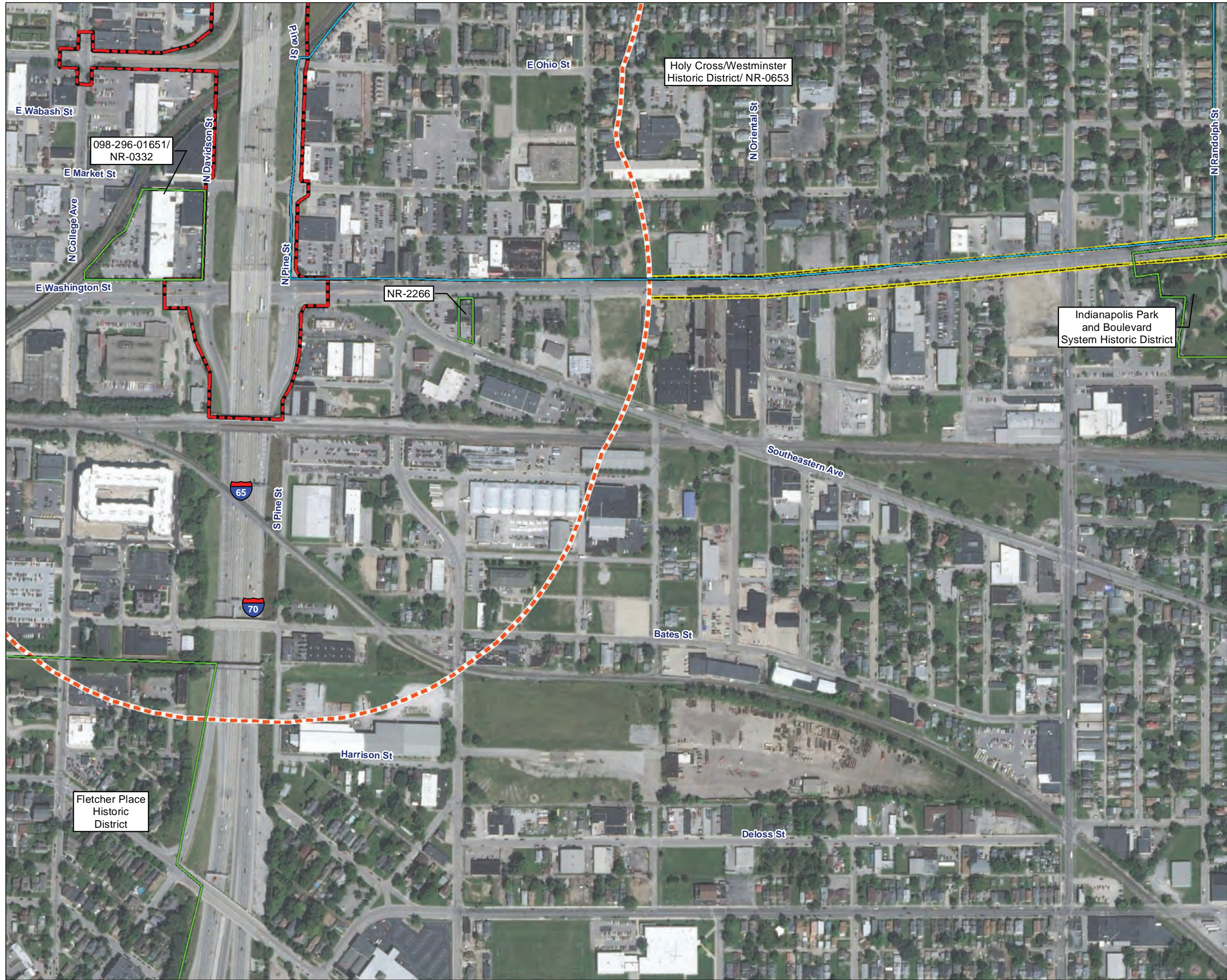


Figure 2 Sheet 5 of 11

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NRHP-listed
- NRHP-eligible

Base: Aerial photograph 2016

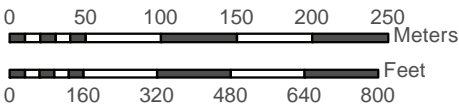
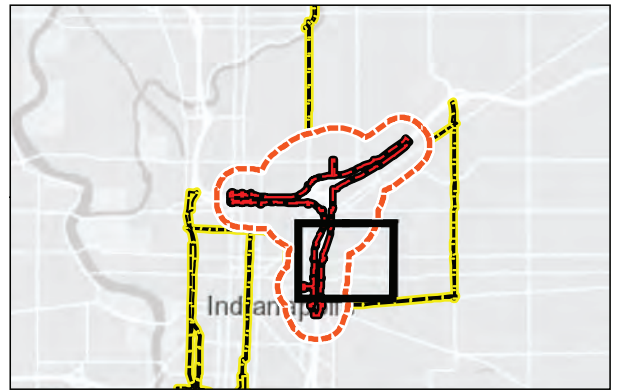
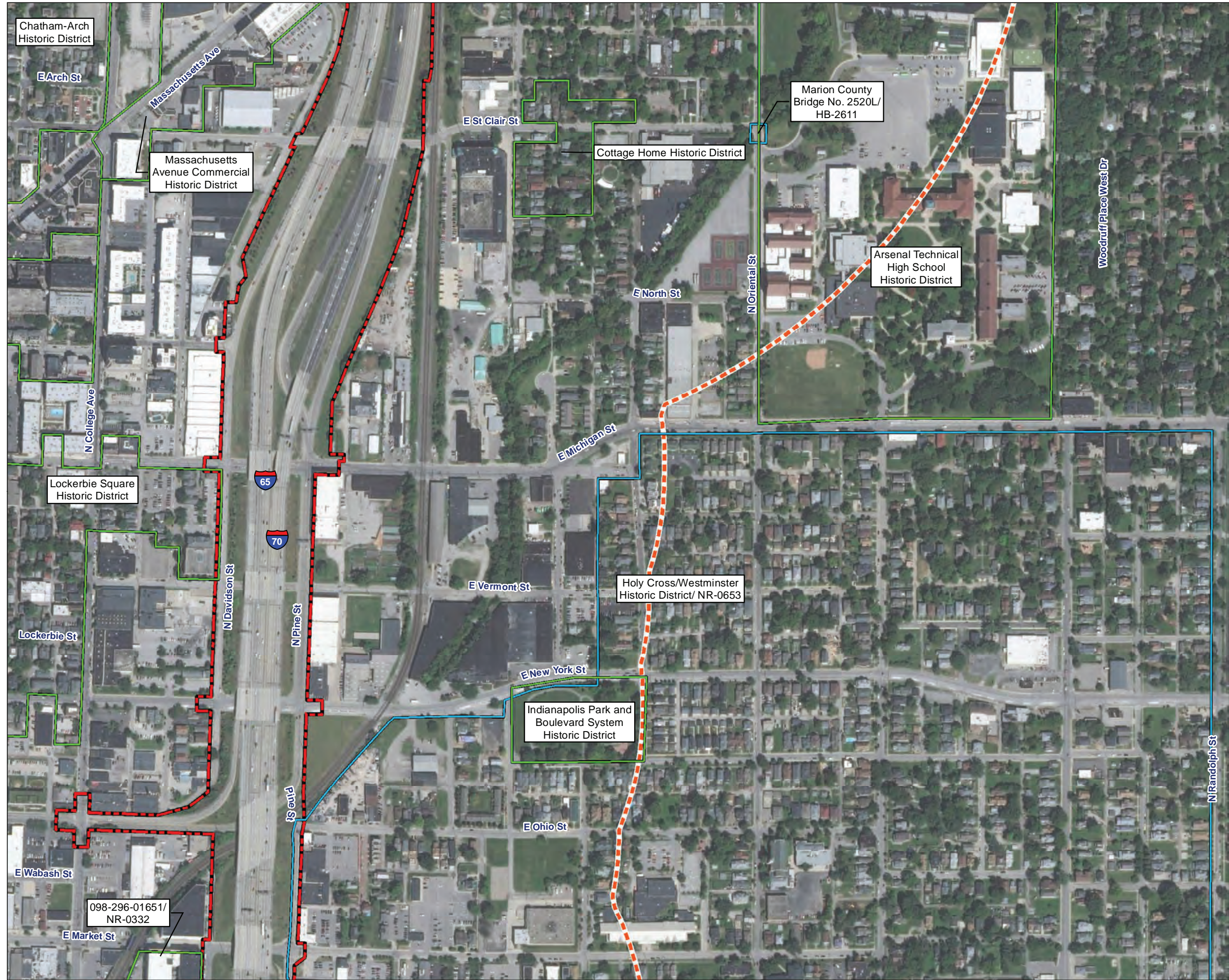


Figure 2 **Sheet 6 of 11**

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- NRHP-listed
- NRHP-eligible

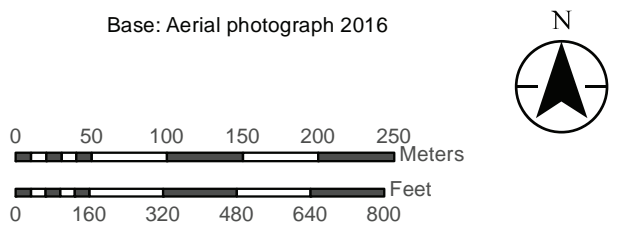
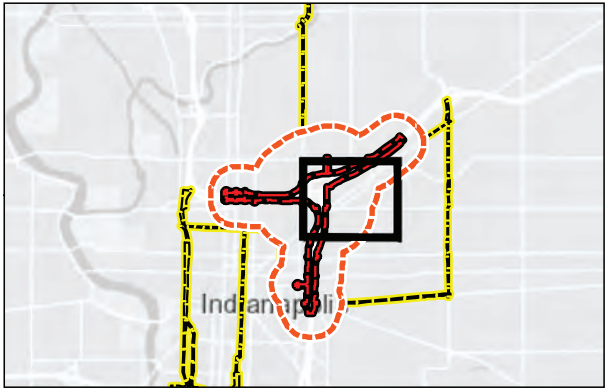


Figure 2 **Sheet 7 of 11**

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- NRHP-listed
- NRHP-eligible

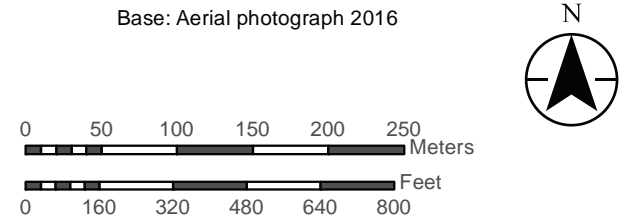
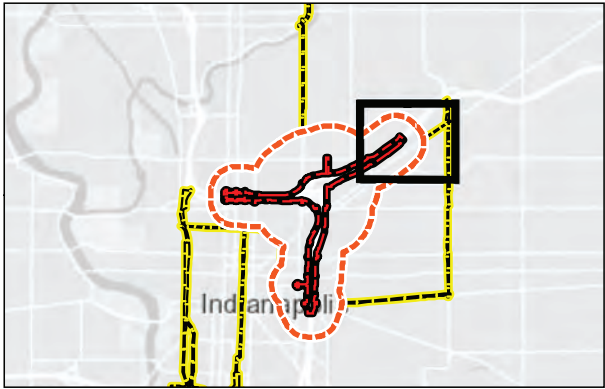
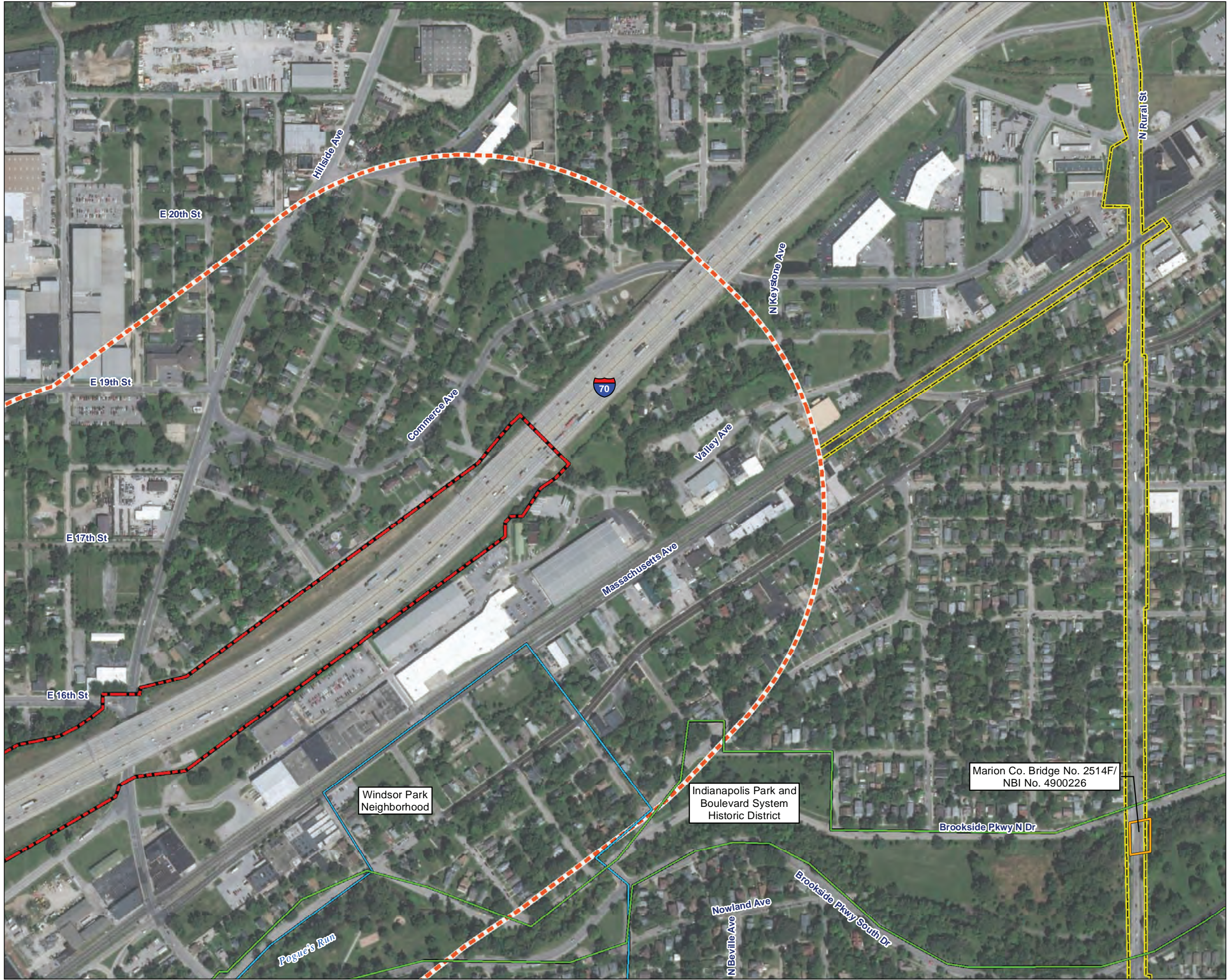


Figure 2 **Sheet 8 of 11**

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)

Created by THD; last saved: 12/6/2019 8:47:12 AM



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NRHP-listed
- NRHP-eligible
- Historic bridge

Base: Aerial photograph 2016

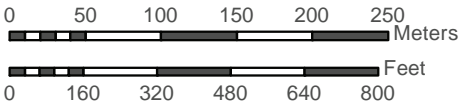
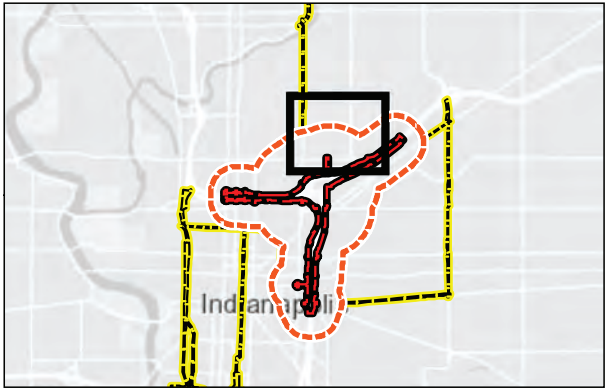
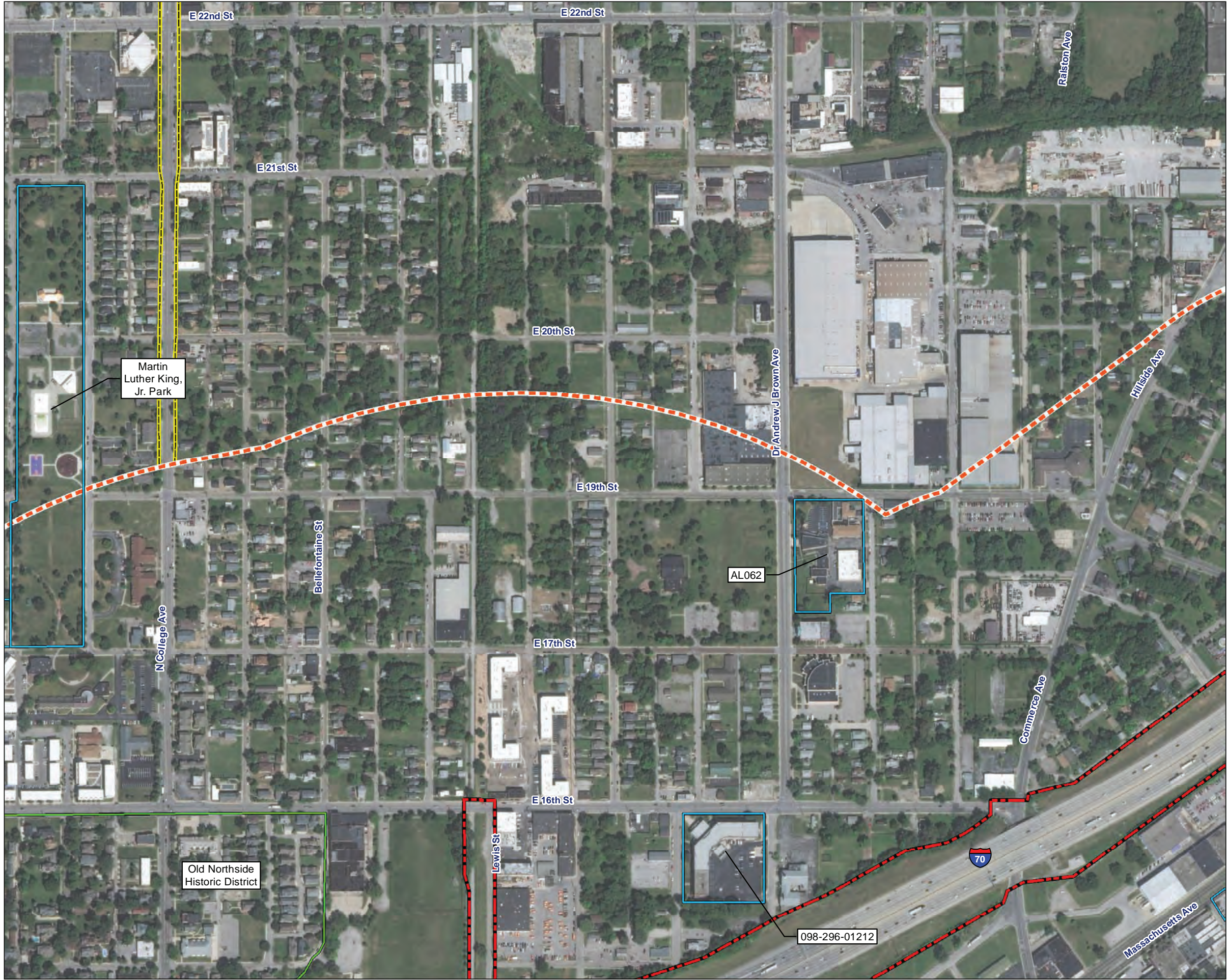


Figure 2 **Sheet 9 of 11**
Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Expanded APE (Temporary Traffic Diversion)
- NRHP-listed
- NRHP-eligible

Base: Aerial photograph 2016

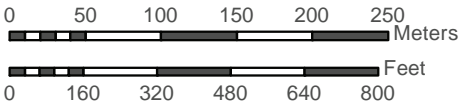
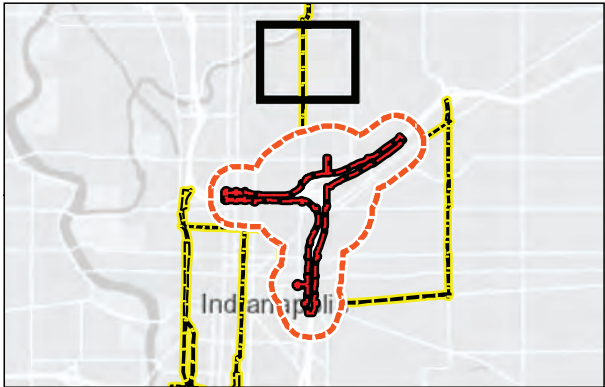
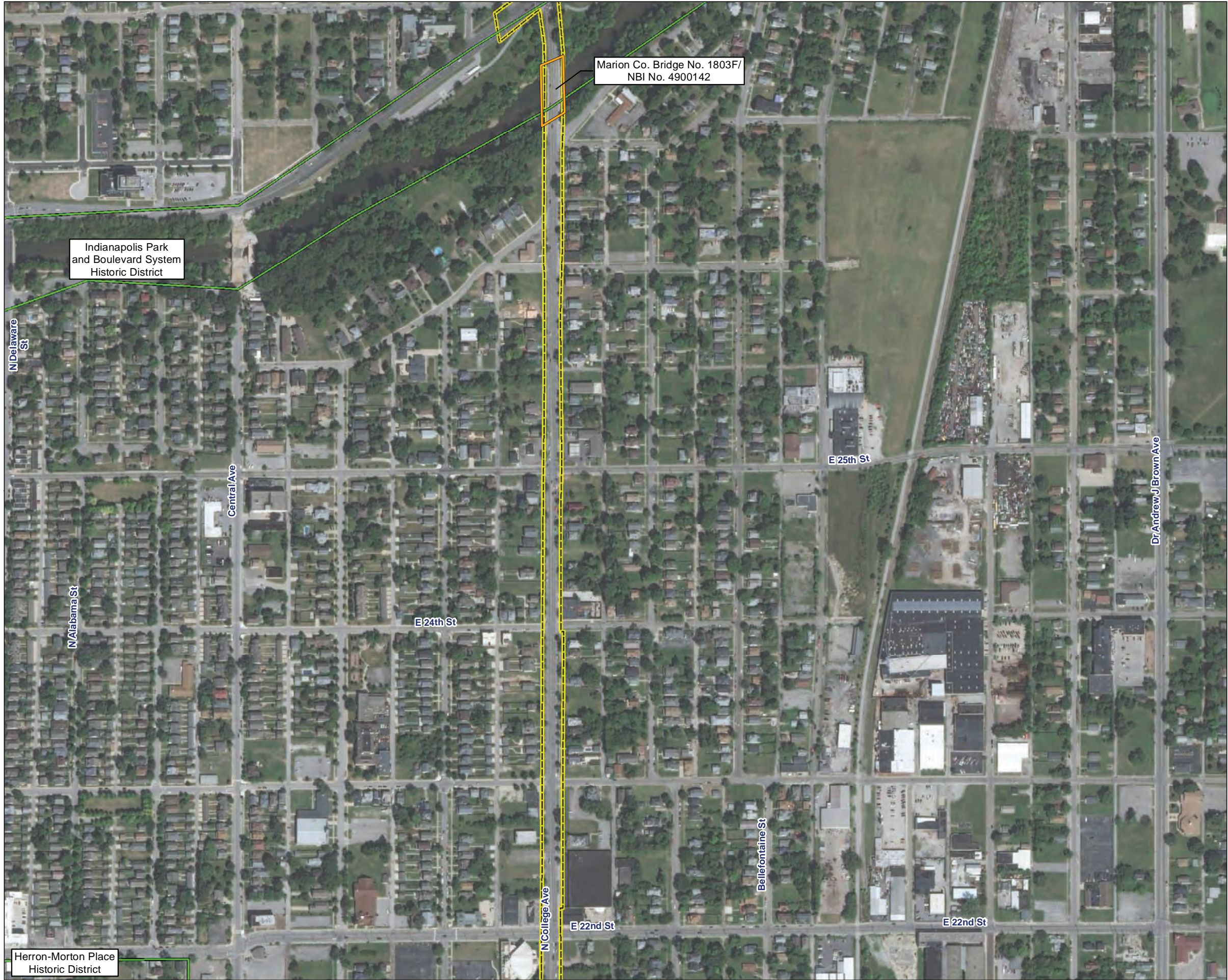


Figure 2 **Sheet 10 of 11**

Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)



- Expanded APE (Temporary Traffic Diversion)
- NRHP-listed
- Historic bridge

Base: Aerial photograph 2016

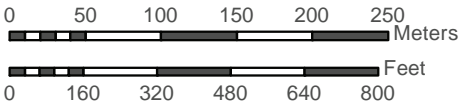


Figure 2 **Sheet 11 of 11**
Aerial photograph showing the records check results, including NHLs, individually listed NRHP resources, NRHP-listed historic districts, and eligible resources. (10 Sheets)

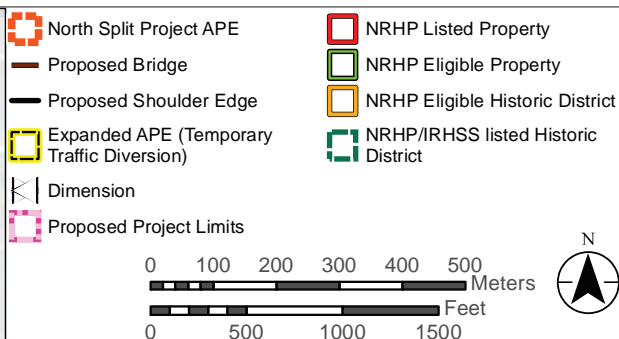
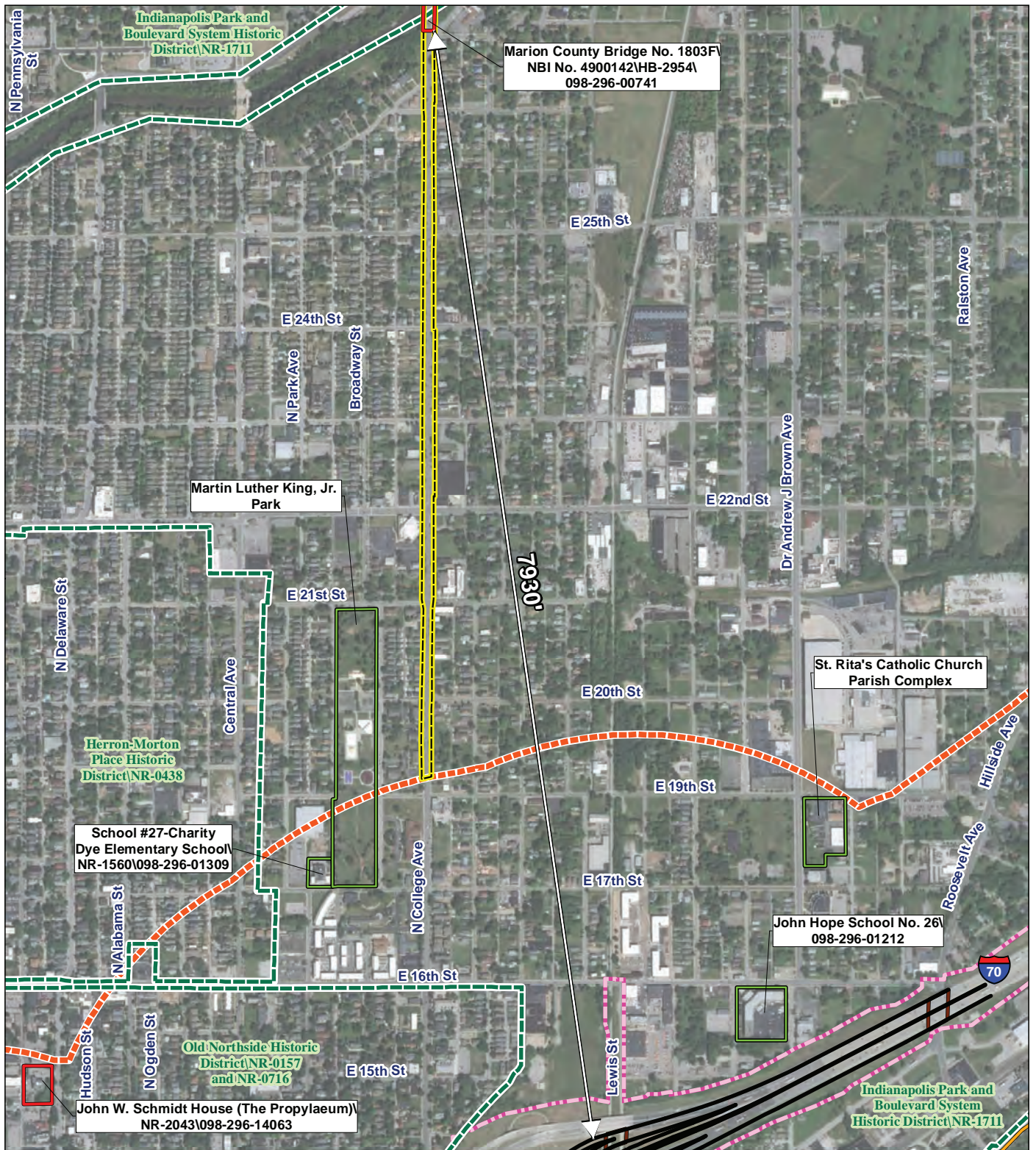


Figure 3

Sheet 1 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

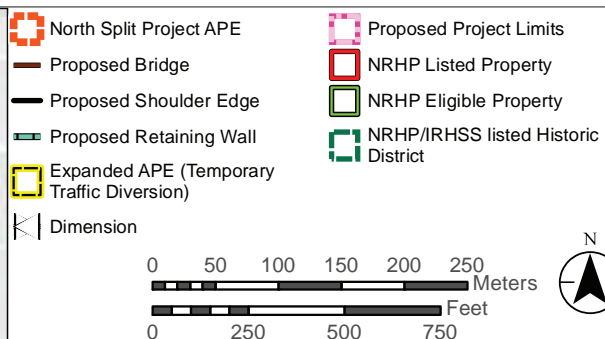
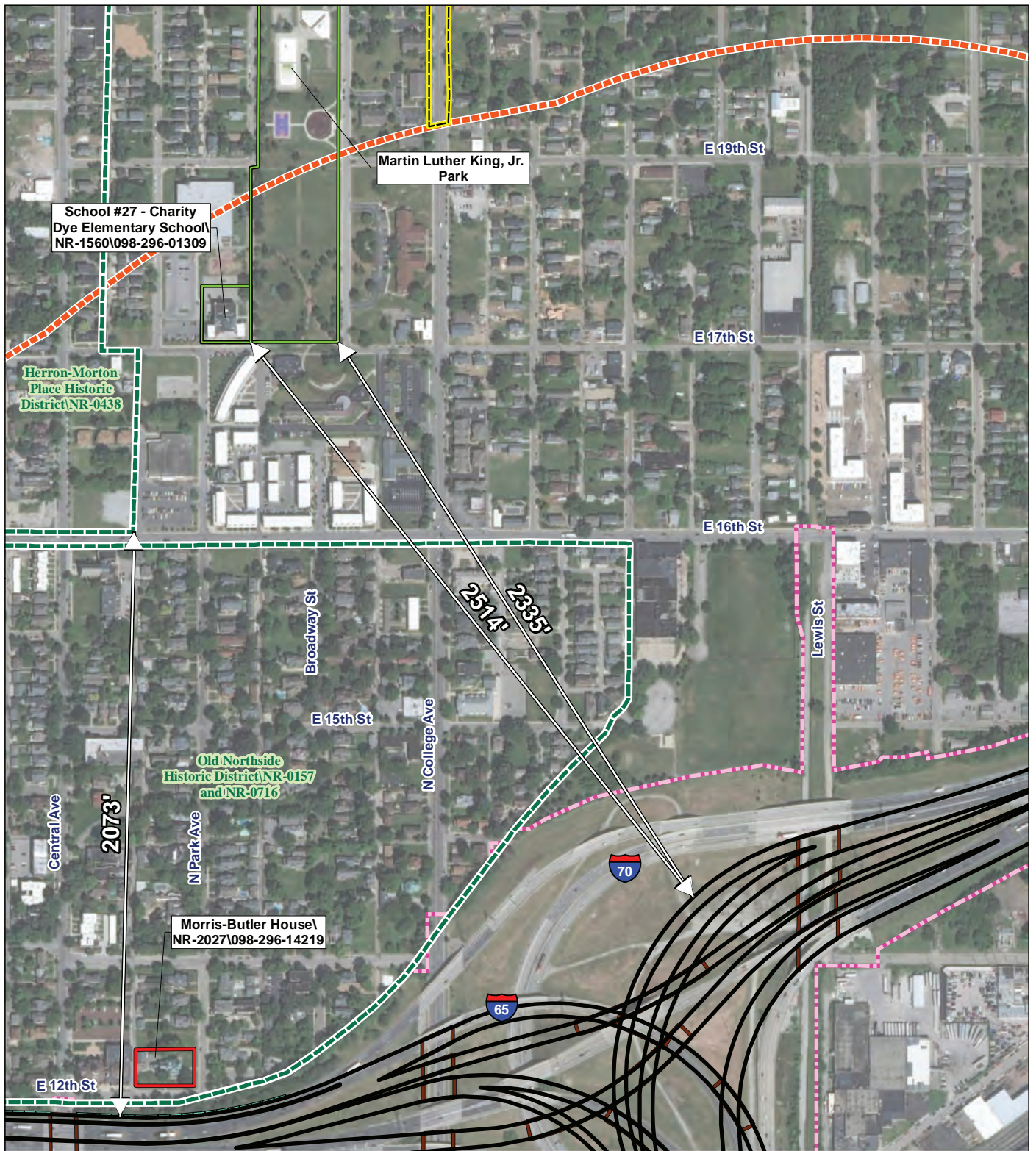


Figure 3 **Sheet 2 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

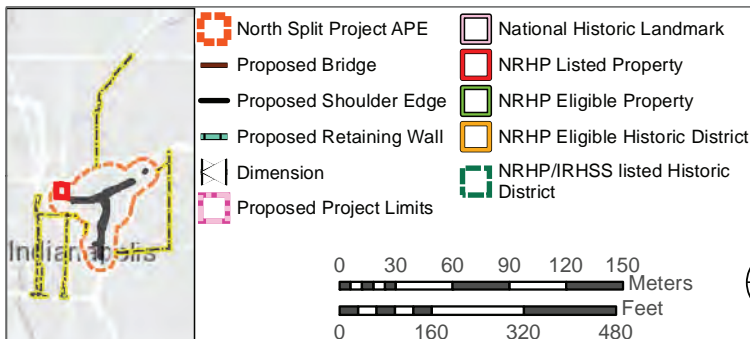
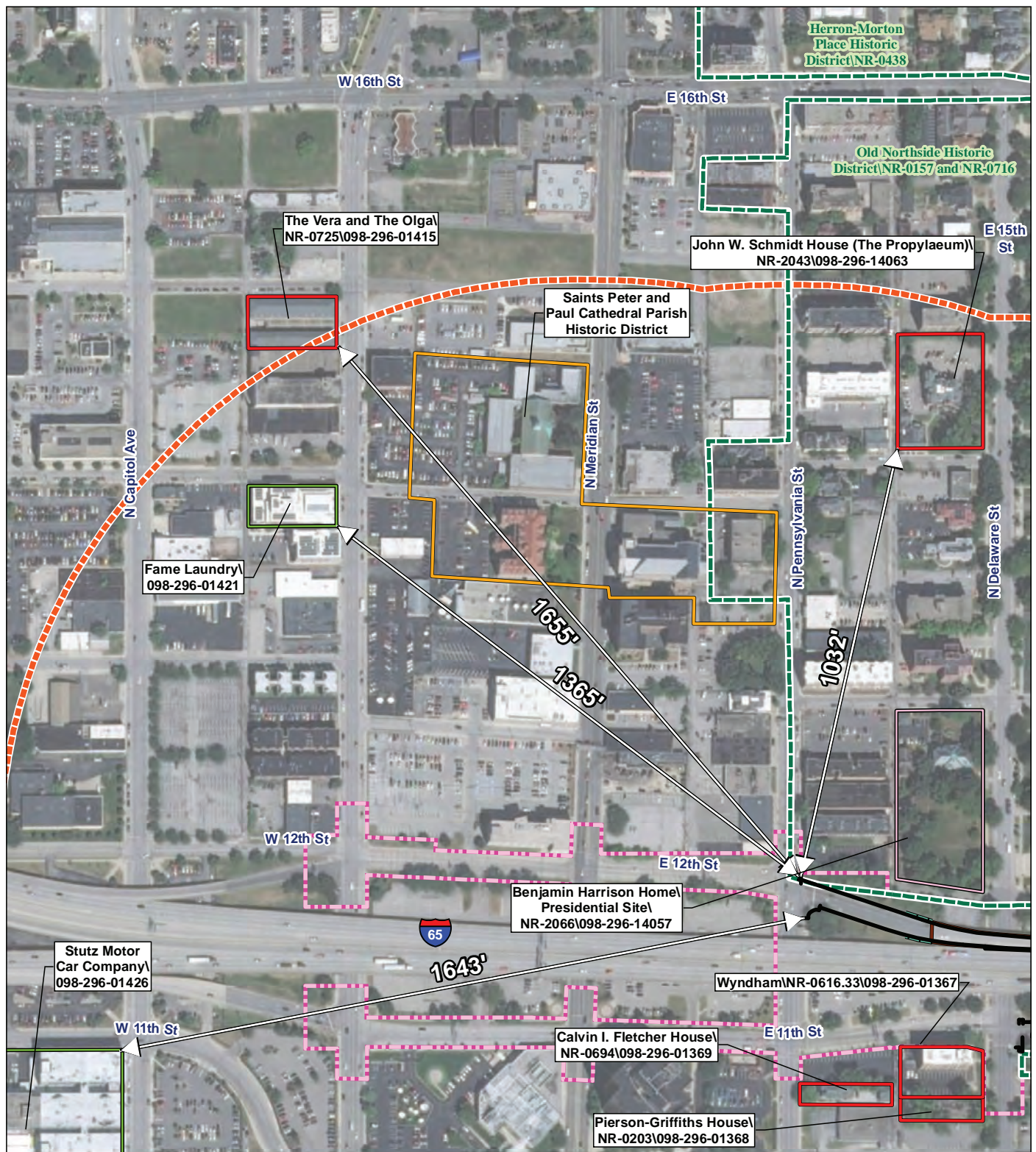
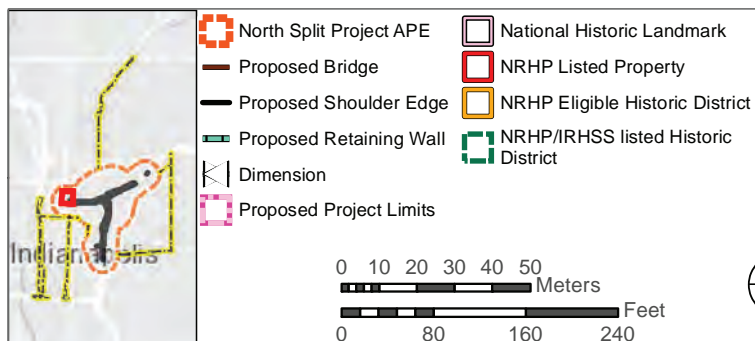


Figure 3

Sheet 3 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017



Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Appendix D, Page 561 of 1672

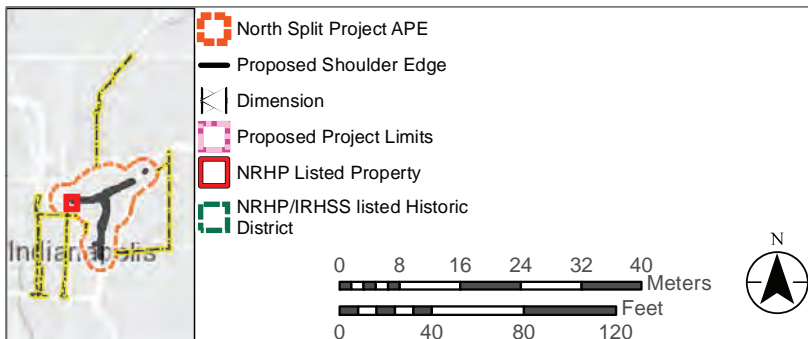


Figure 3 **Sheet 5 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

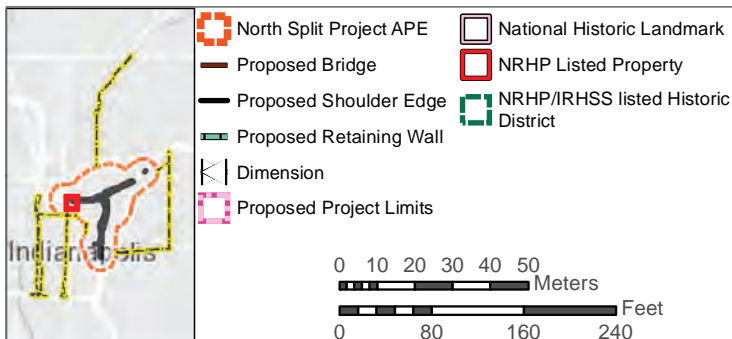
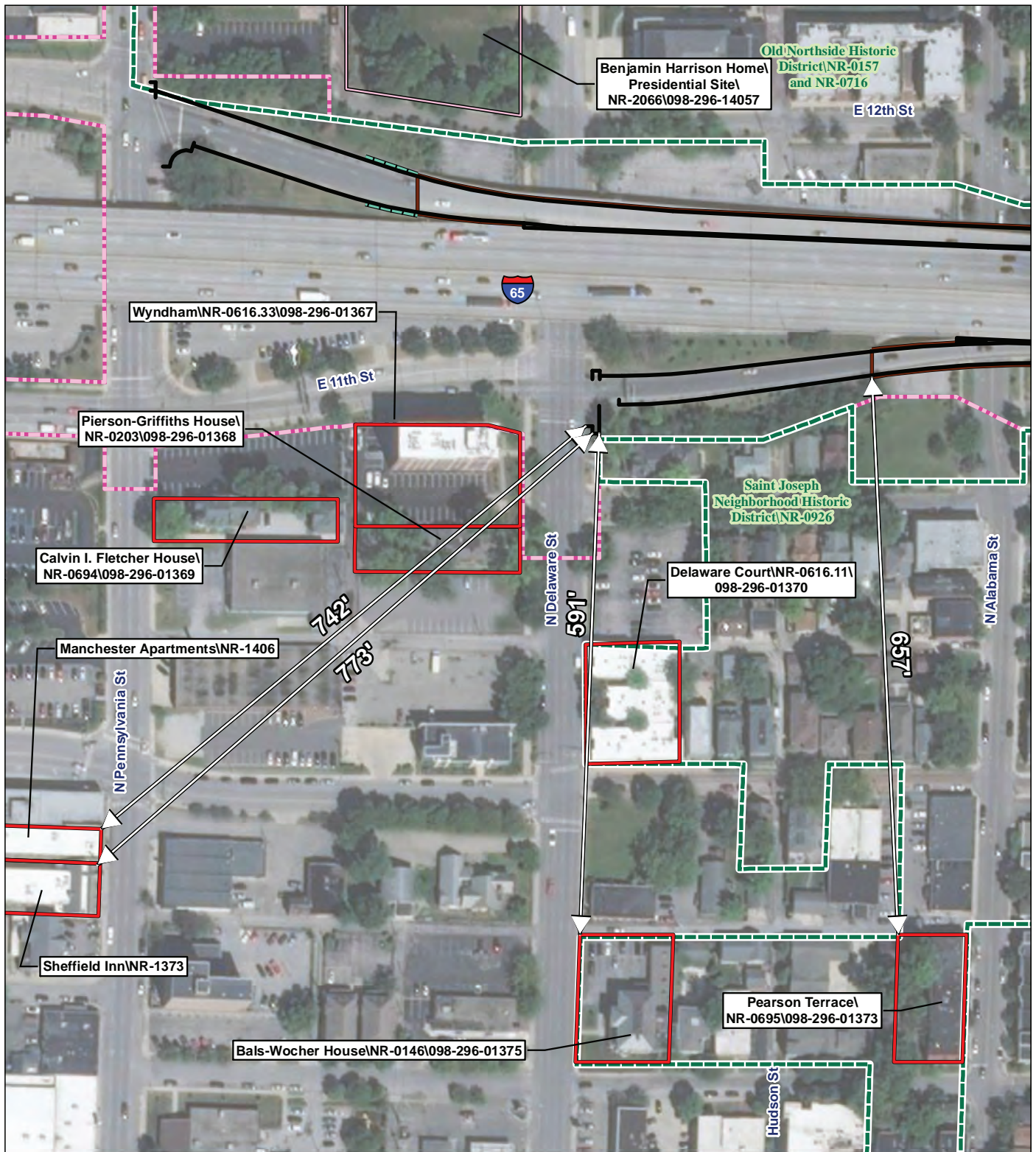


Figure 3 **Sheet 6 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

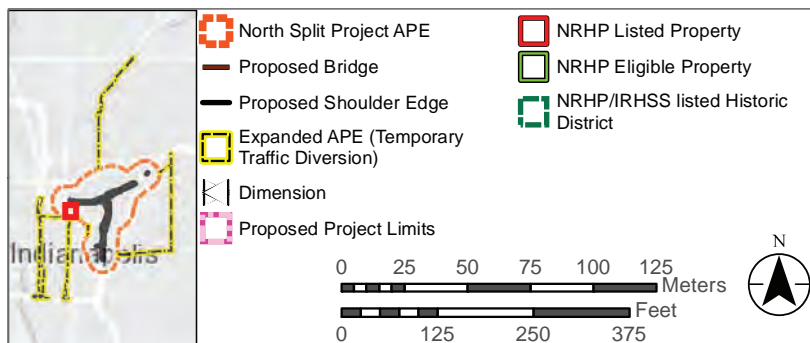
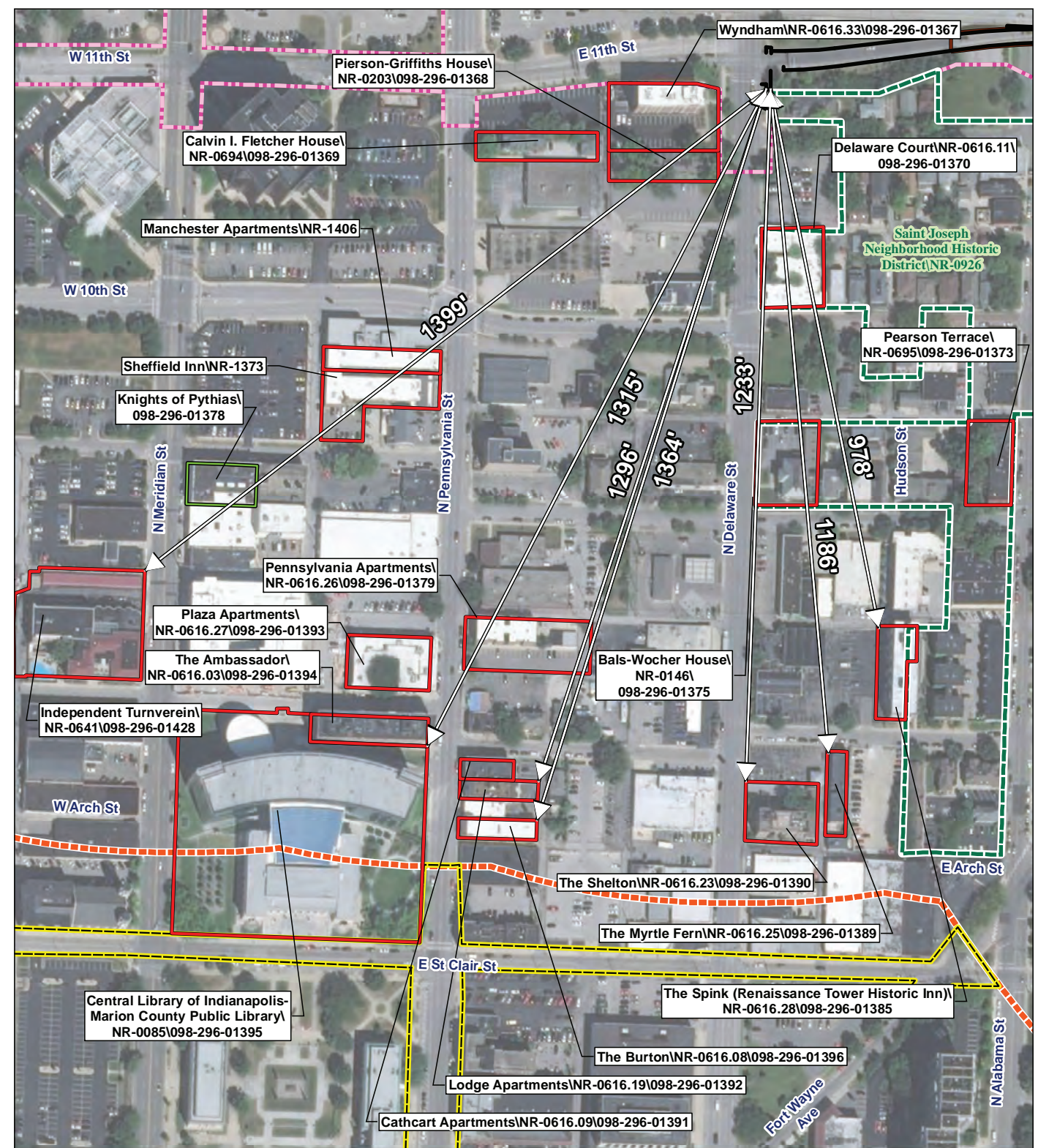


Figure 3 **Sheet 7 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

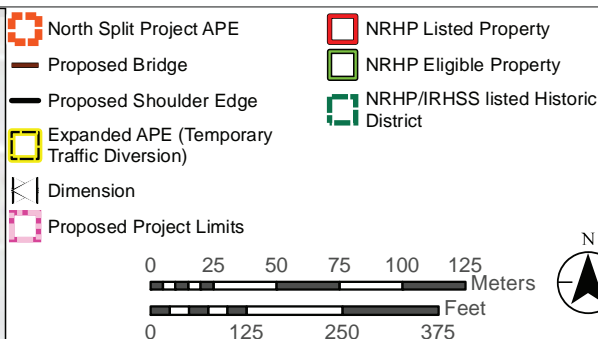
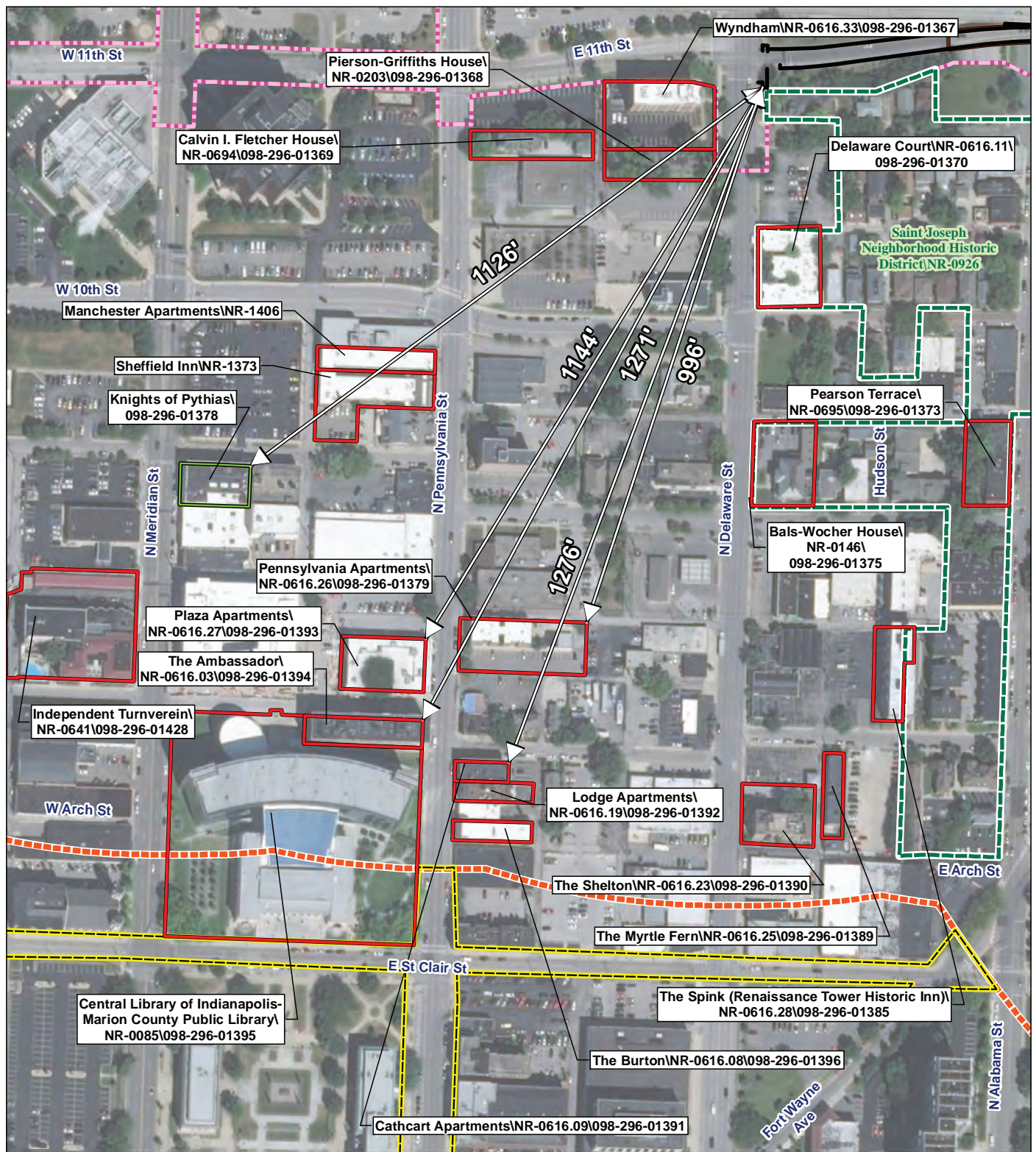


Figure 3 **Sheet 8 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

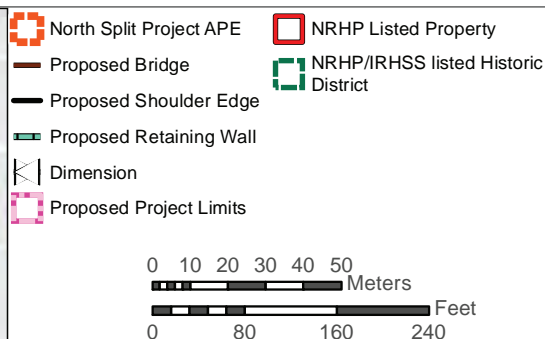
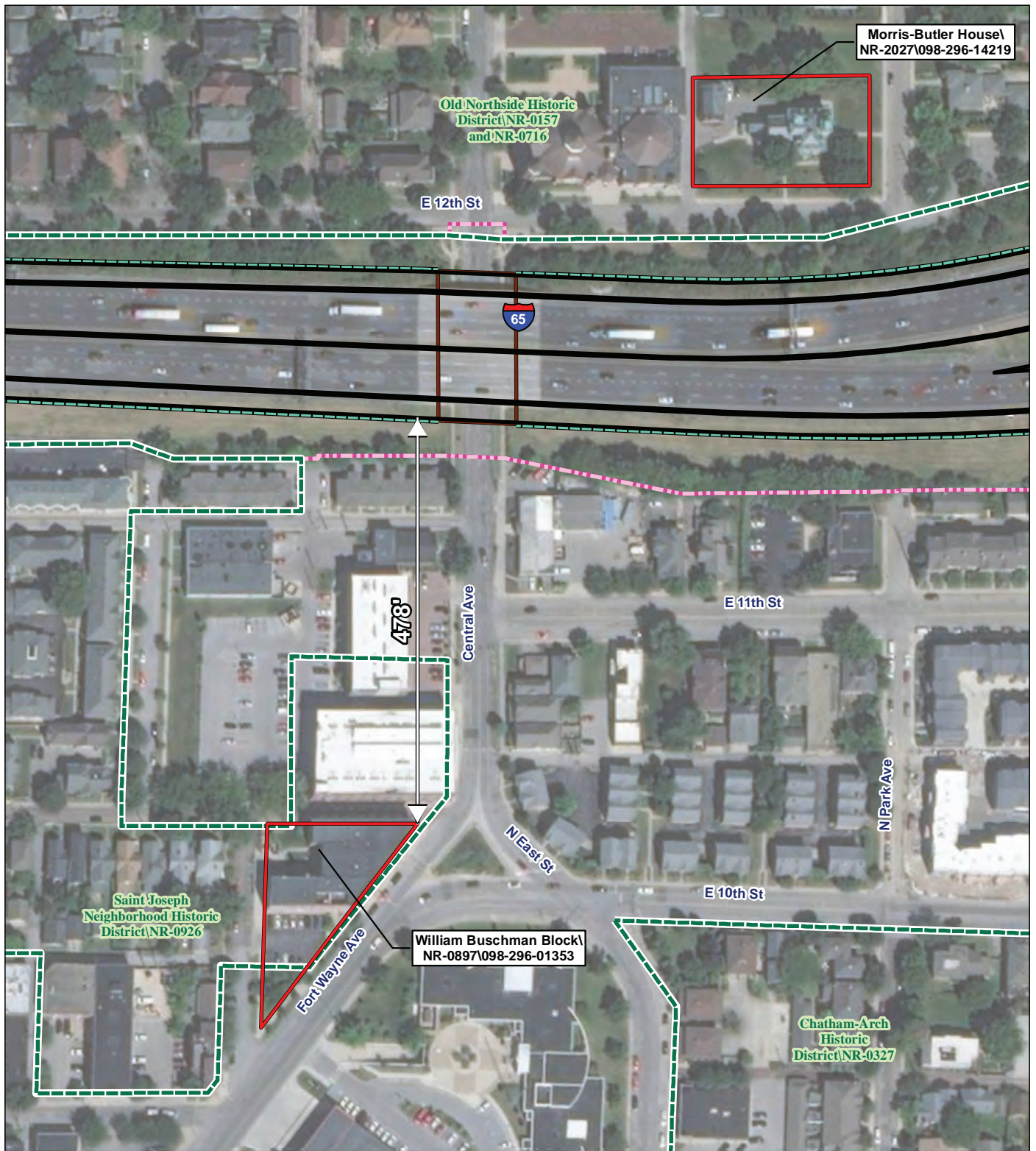
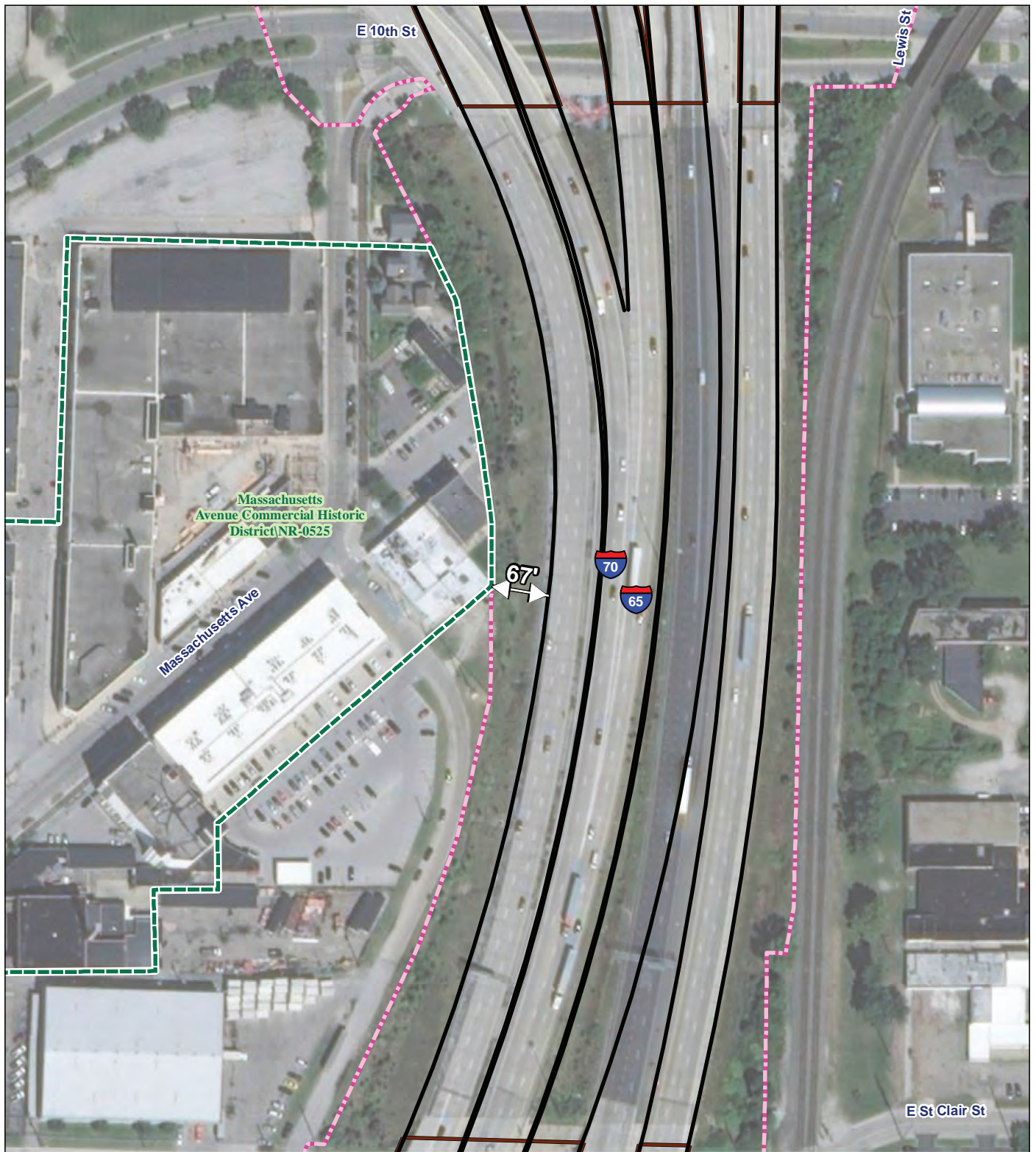


Figure 3 **Sheet 9 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017



- North Split Project APE
- Proposed Bridge
- Proposed Shoulder Edge
- Dimension
- Proposed Project Limits
- NRHP/IRHSS listed Historic District

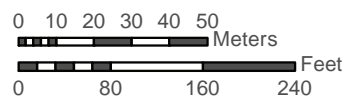


Figure 3

Sheet 11 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

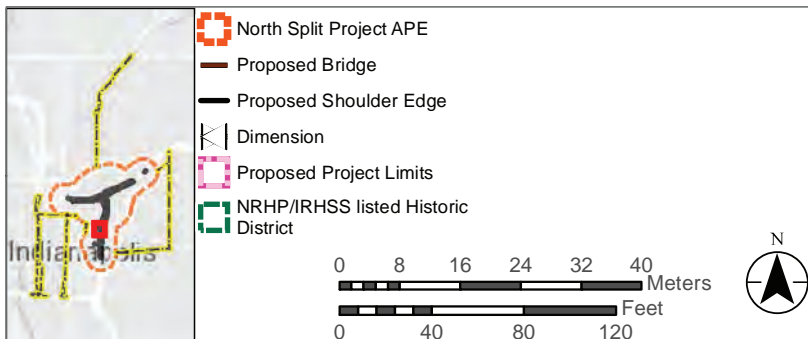


Figure 3 **Sheet 12 of 21**

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

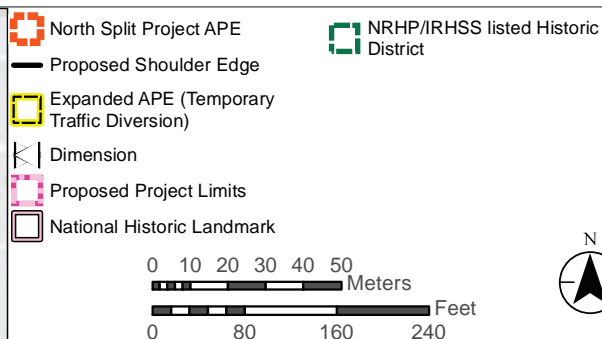
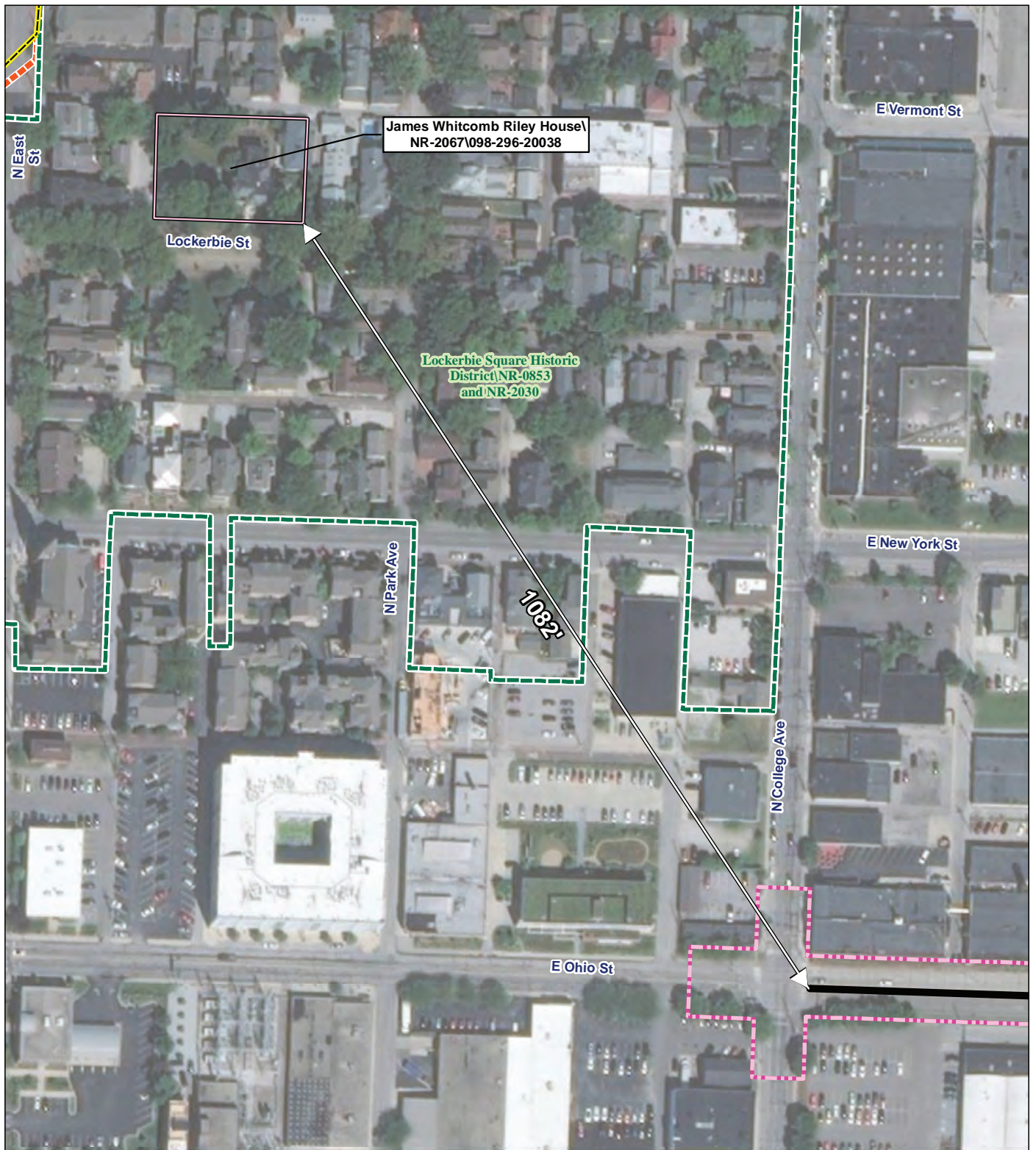


Figure 3

Sheet 13 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

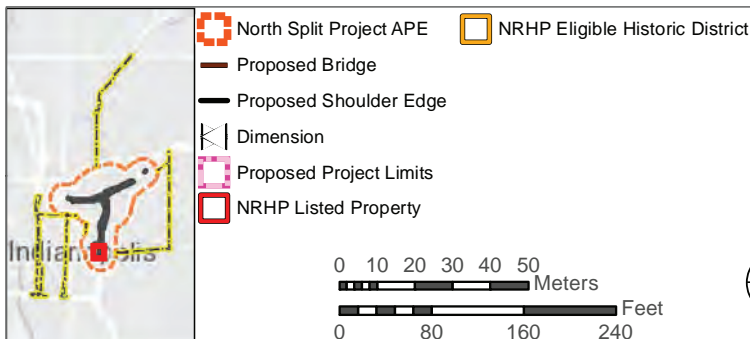
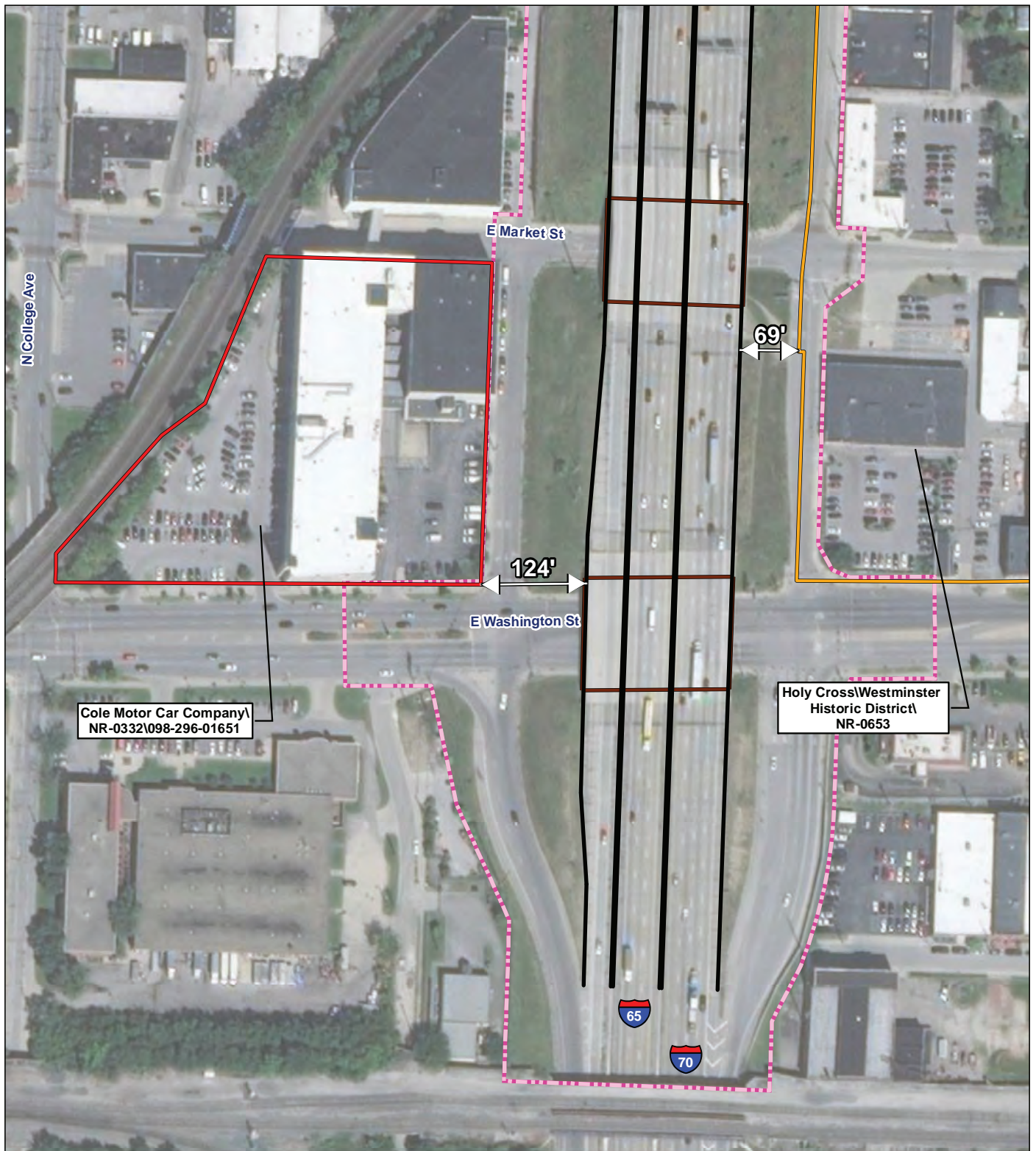
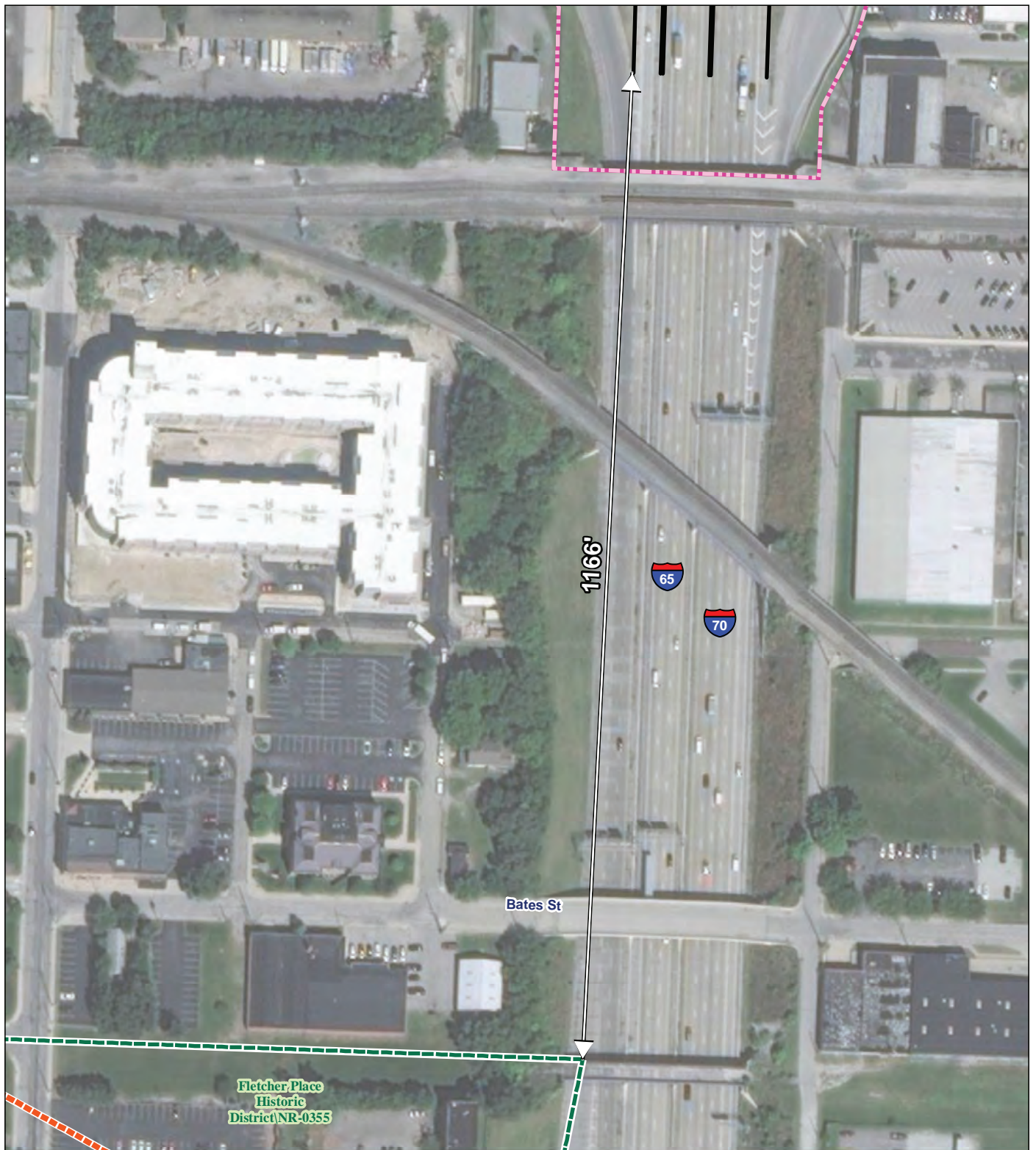


Figure 3

Sheet 14 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017



- North Split Project APE
- Proposed Shoulder Edge
- | Dimension
- Proposed Project Limits
- NRHP/IRHSS listed Historic District

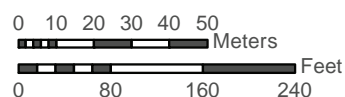


Figure 3

Sheet 15 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

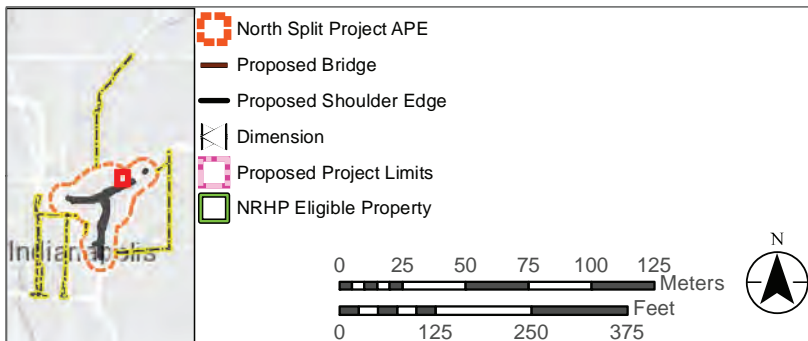
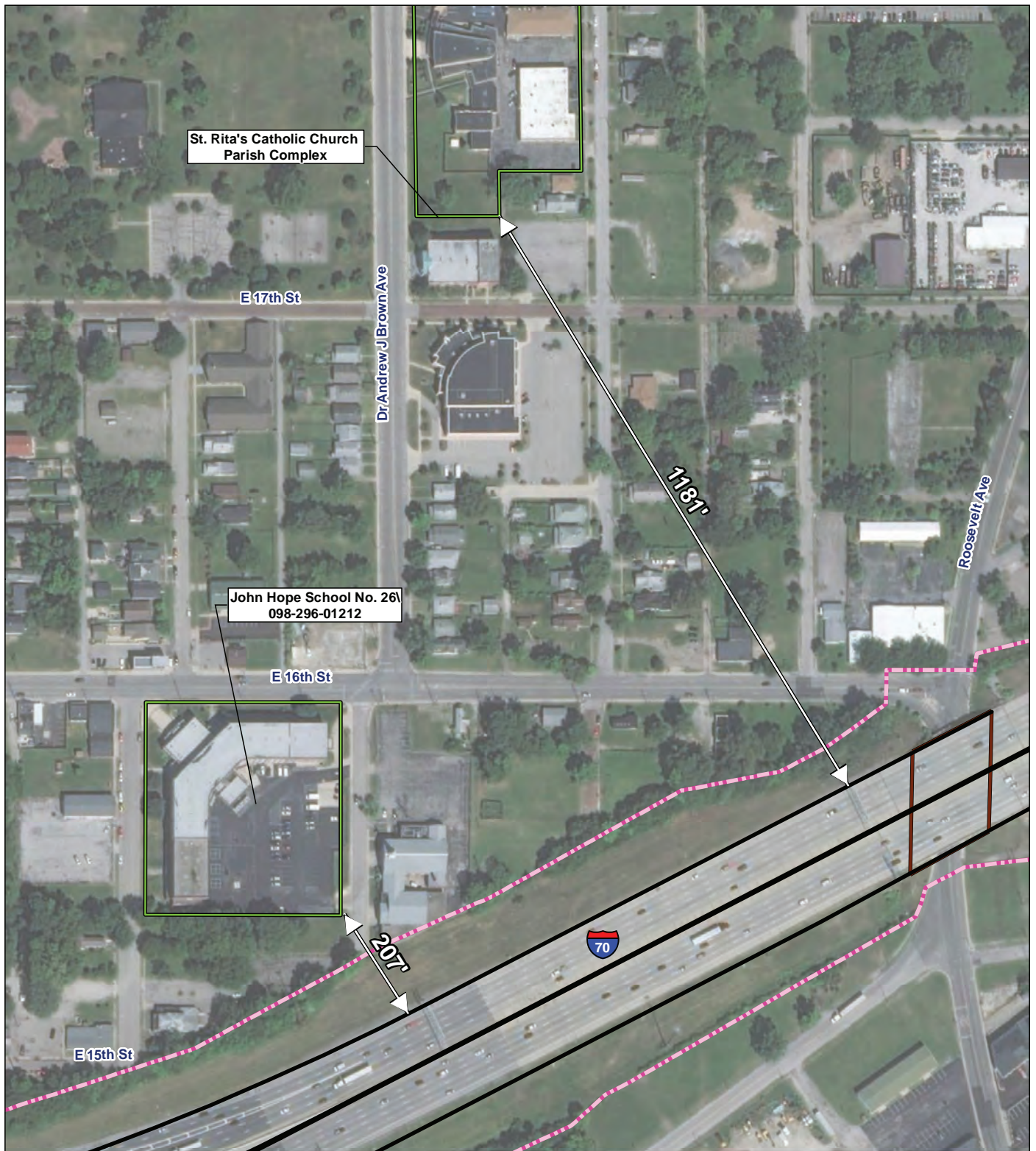


Figure 3

Sheet 16 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

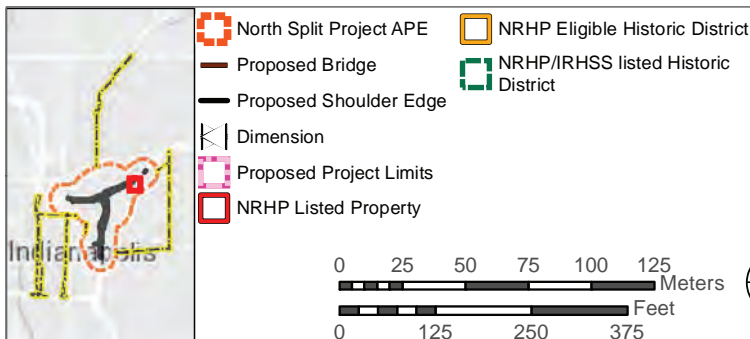
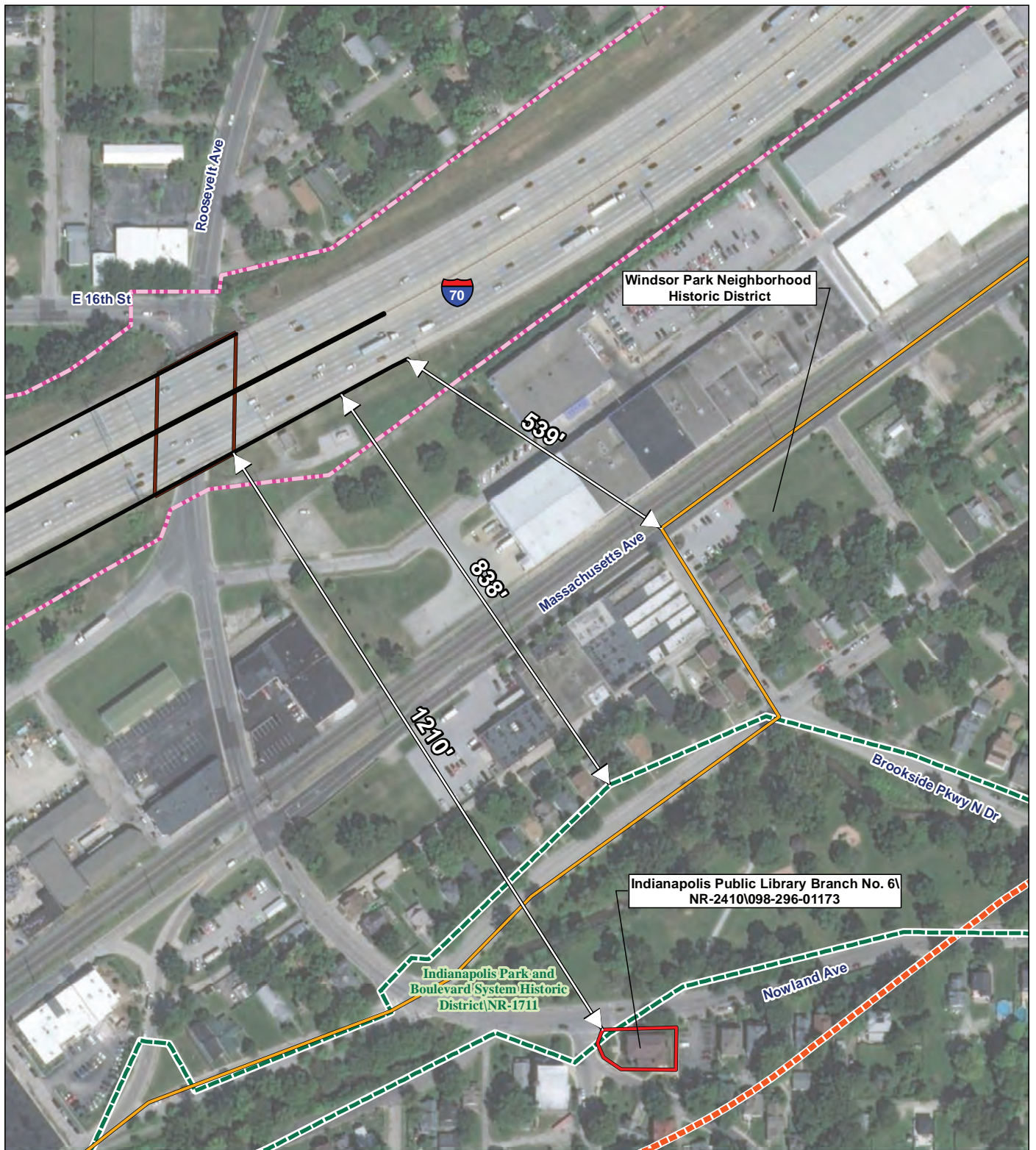


Figure 3

Sheet 17 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

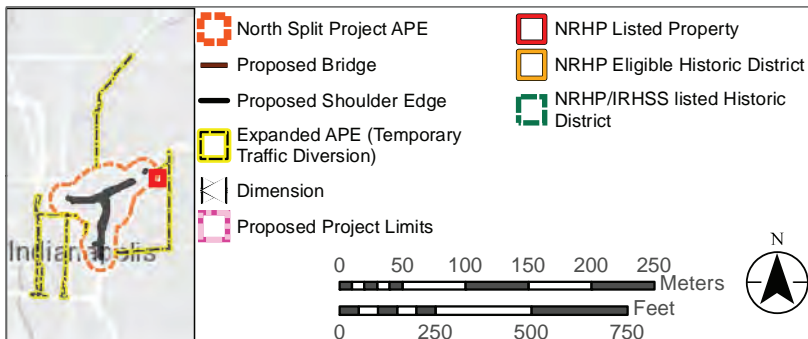


Figure 3

Sheet 18 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

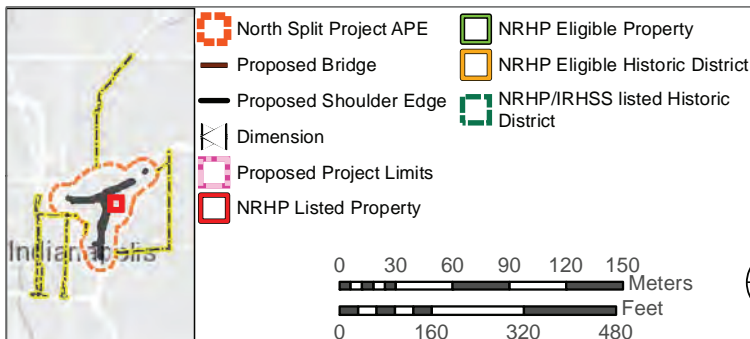


Figure 3

Sheet 19 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

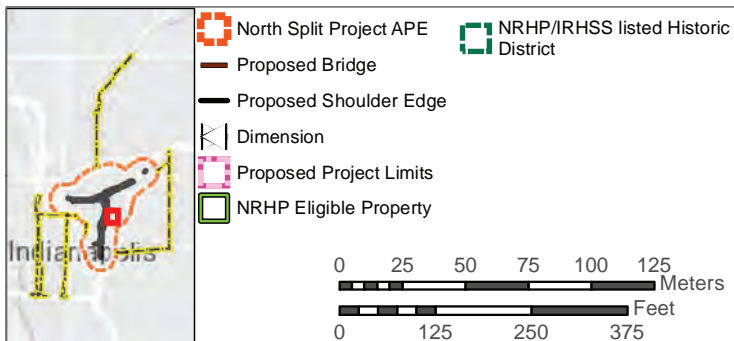
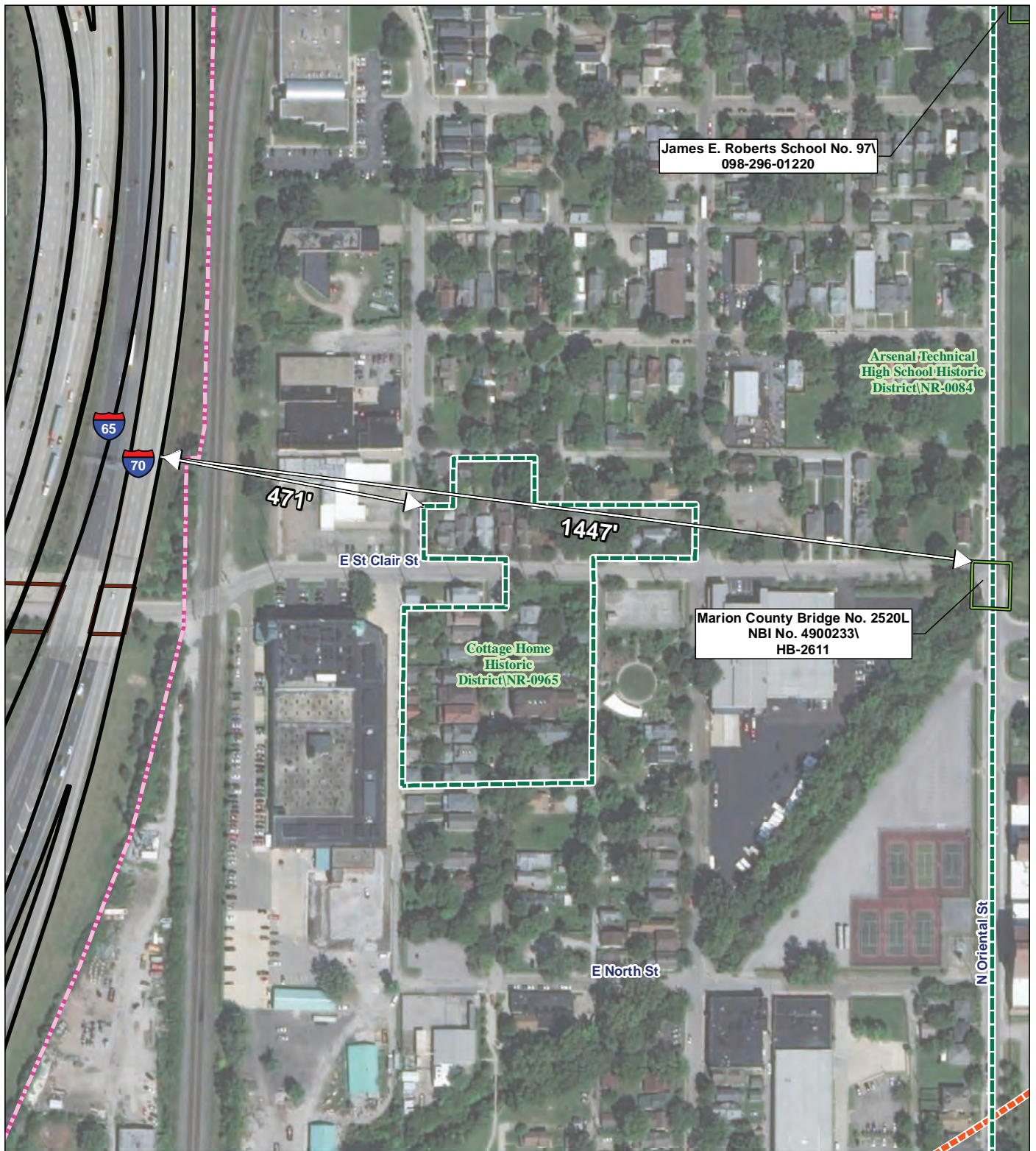


Figure 3

Sheet 20 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

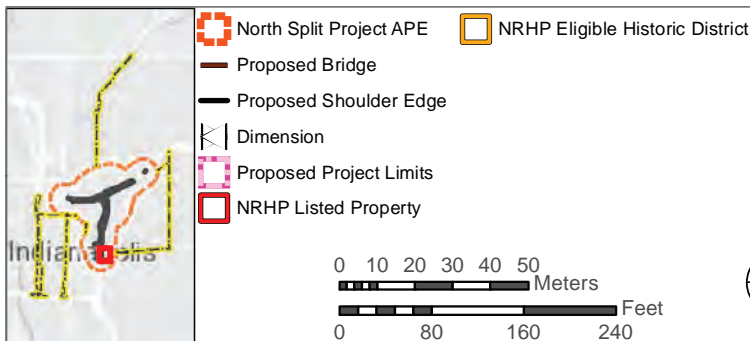
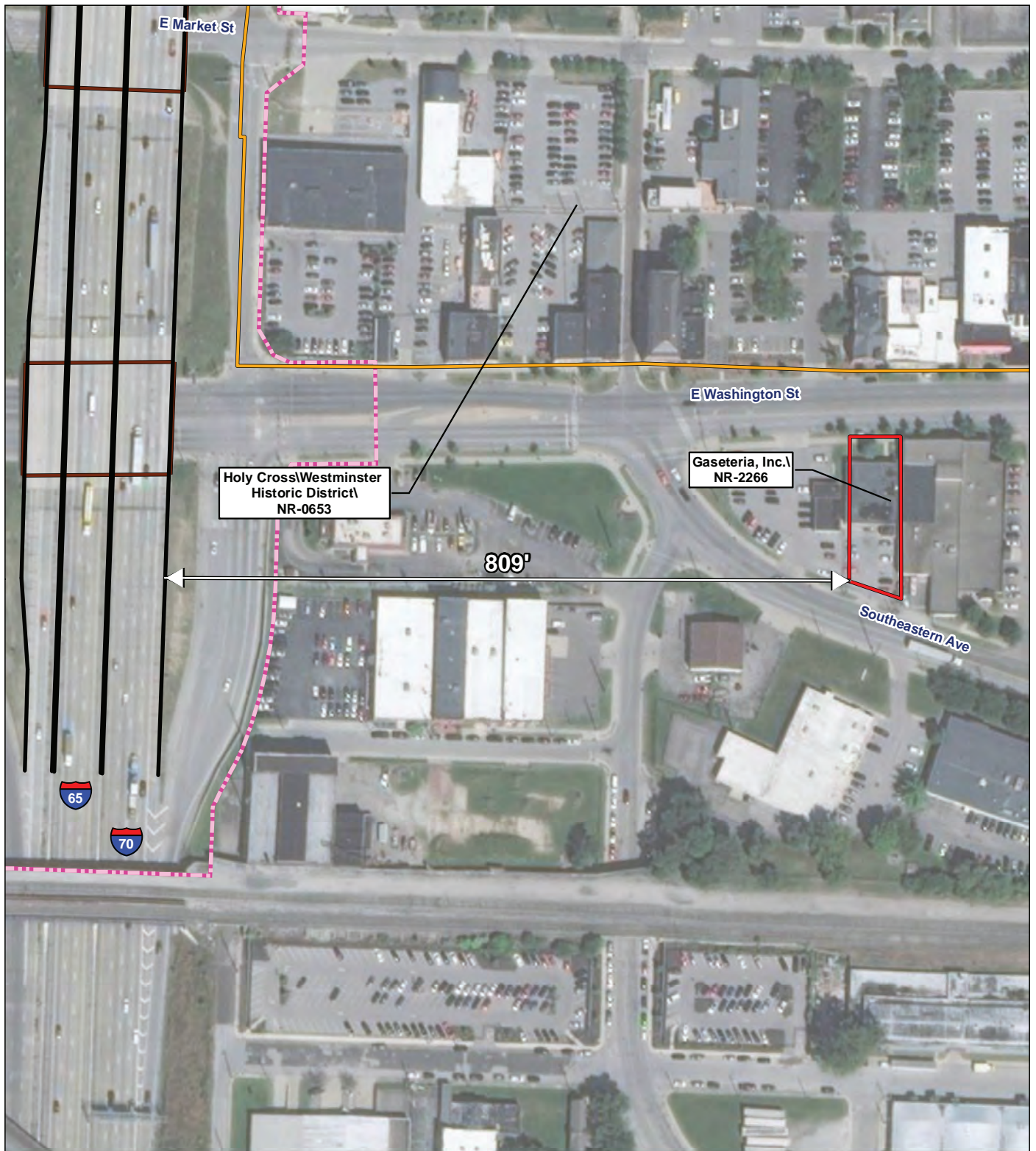


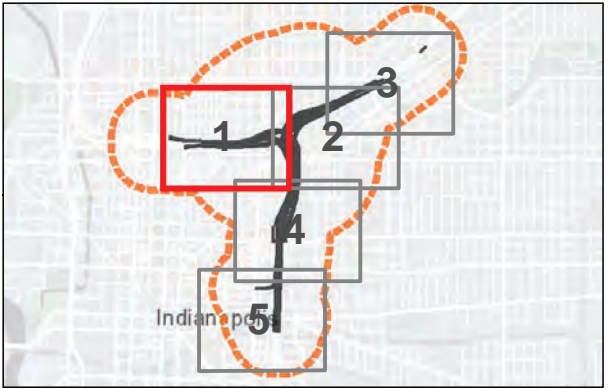
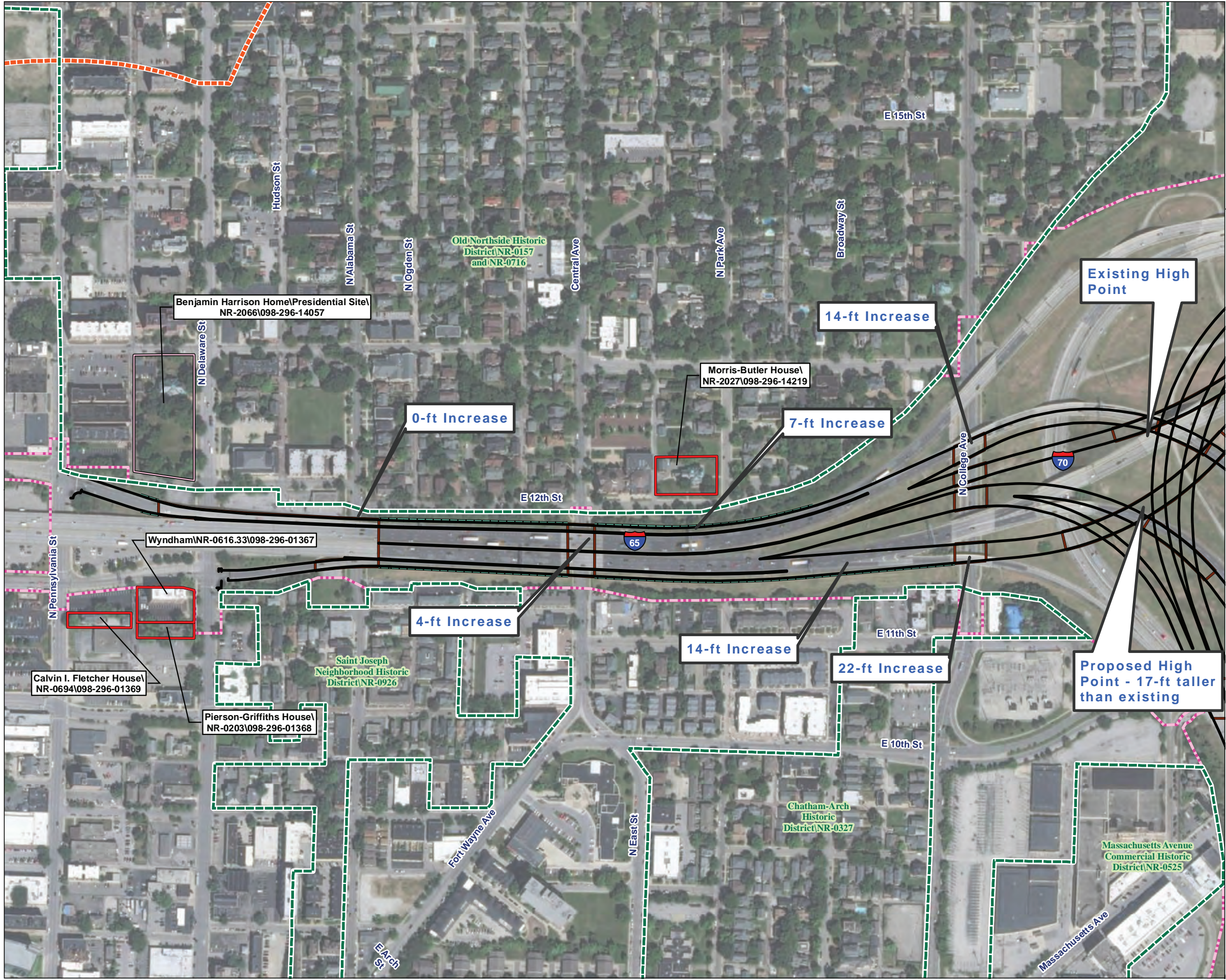
Figure 3

Sheet 21 of 21

Aerial photograph showing the APE, the expanded APE for temporary traffic diversion, the NRHP-listed or determined eligible resources, and graphical depictions of the closest distance from each historic resource to the proposed shoulder edge of the undertaking. (21 Sheets)

Base: Aerial photograph 2017

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- North Split Project APE
- Proposed Bridge
- Proposed Shoulder Edge
- Proposed Retaining Wall
- Proposed Project Limits
- National Historic Landmark
- NRHP Listed Property
- NRHP/IRHSS listed Historic District

Note: Only the affected properties/historic districts are displayed on this map.

Base: Aerial photograph 2017

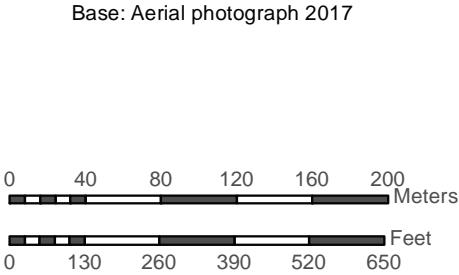
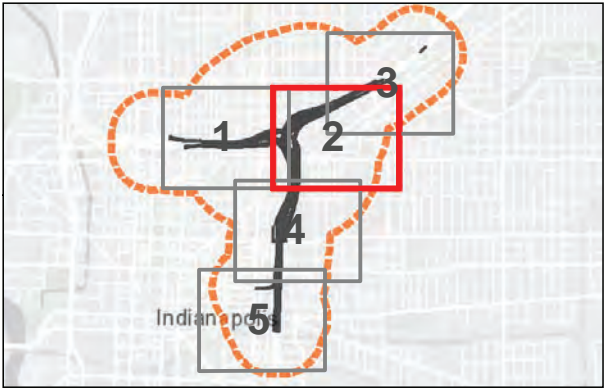
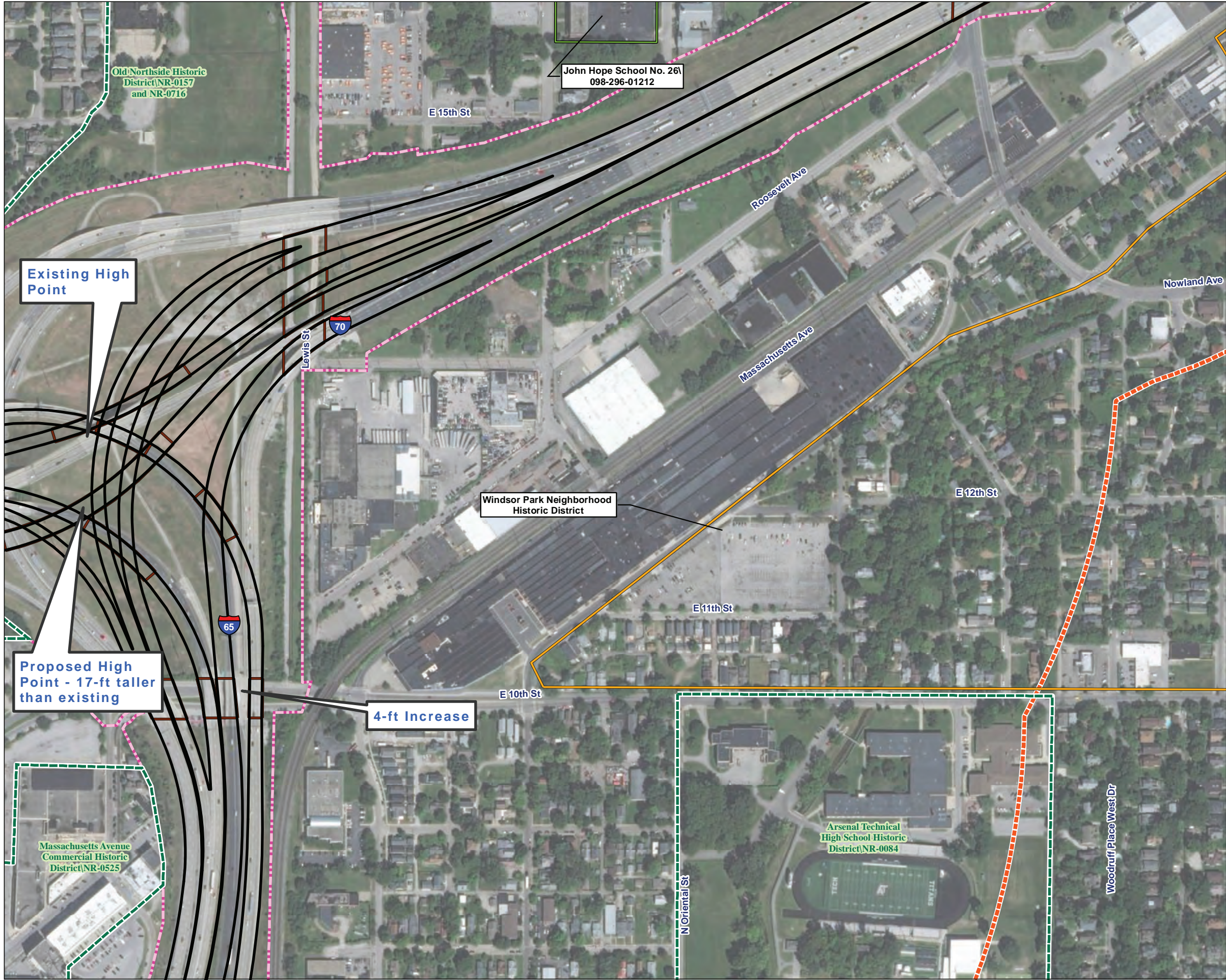


Figure 4 **Sheet 1 of 5**
Aerial photograph showing anticipated elevation changes of the North Split Project. (5 Sheets)

Created by JVT; last saved: 11/22/2019 11:53:04 AM



- North Split Project
- Proposed Bridge
- Proposed Shoulder Edge
- Proposed Project Limits
- NRHP eligible
- NRHP eligible Historic District
- NRHP/IRHSS listed Historic District

Note: Only the affected properties/historic districts are displayed on this map.

Base: Aerial photograph 2017

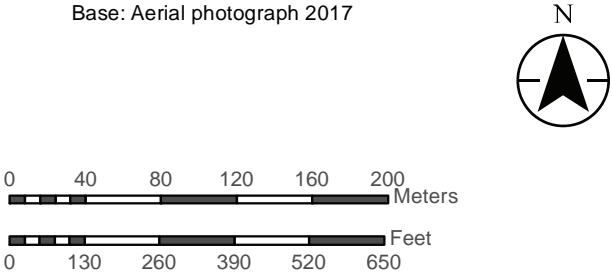
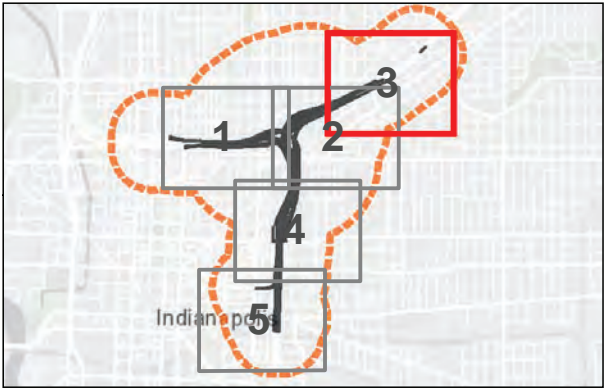
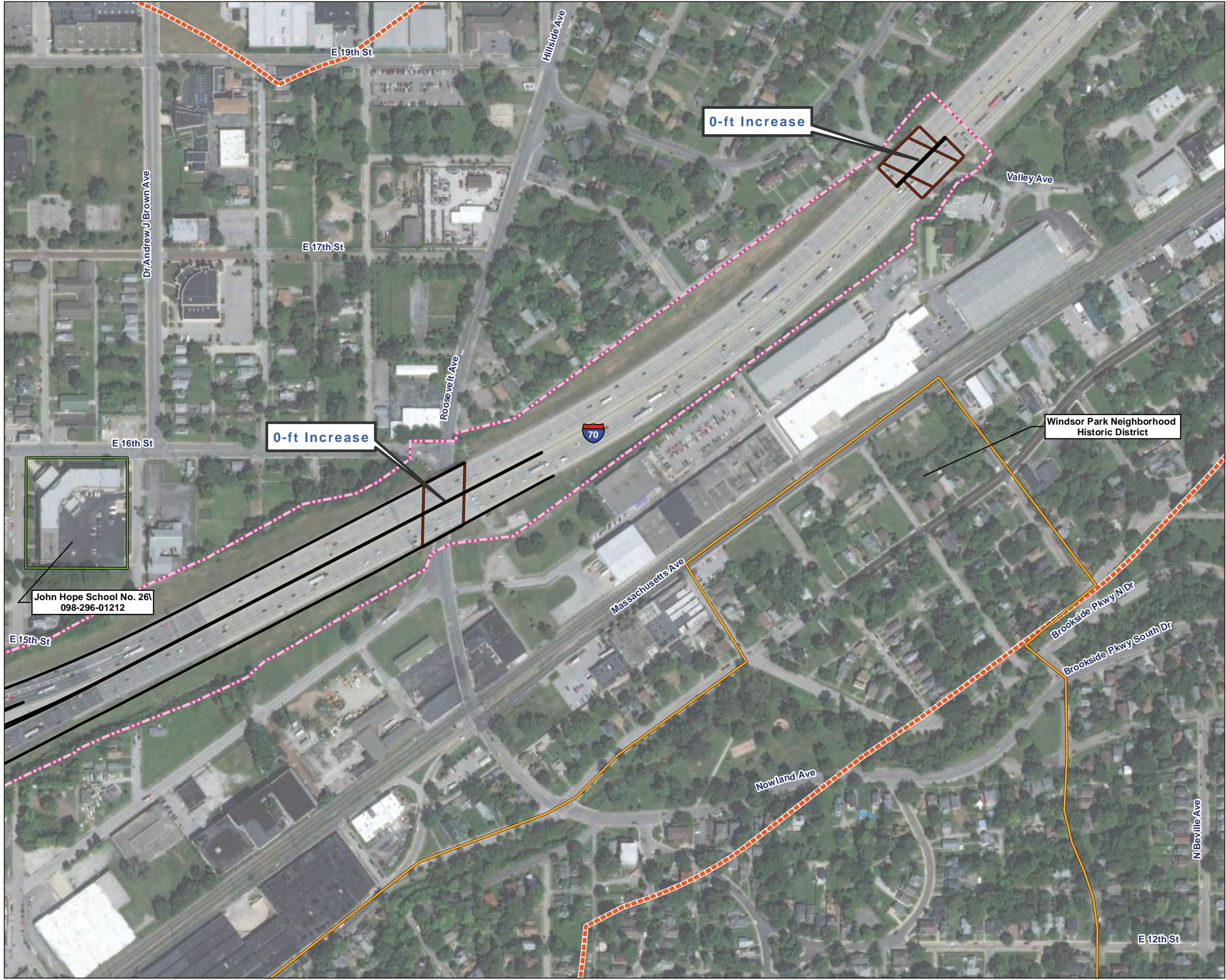


Figure 4 **Sheet 2 of 5**
Aerial photograph showing anticipated elevation changes of the North Split Project. (5 Sheets)

Created by JVT; last saved: 11/22/2019 11:53:04 AM



- North Split Project APE
- Proposed Bridge
- Proposed Shoulder Edge
- Proposed Project Limits
- NRHP eligible
- NRHP eligible Historic District

Note: Only the affected properties/historic districts are displayed on this map.

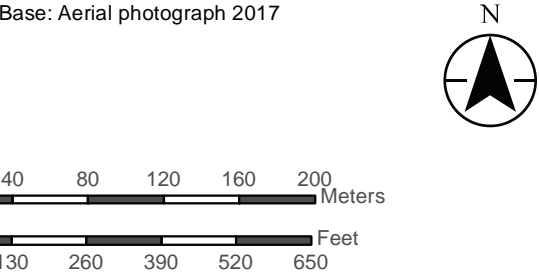
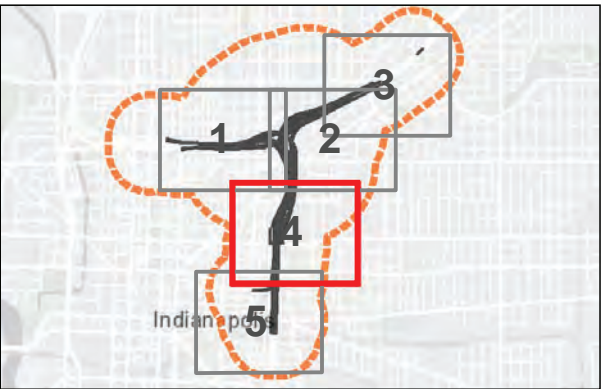


Figure 4 **Sheet 3 of 5**

Aerial photograph showing anticipated elevation changes of the North Split Project. (5 Sheets)



- North Split Project APE
- Proposed Bridge
- Proposed Shoulder Edge
- Proposed Project Limits
- NRHP eligible Historic District
- NRHP/IRHSS listed Historic District

Note: Only the affected properties/historic districts are displayed on this map.

Base: Aerial photograph 2017

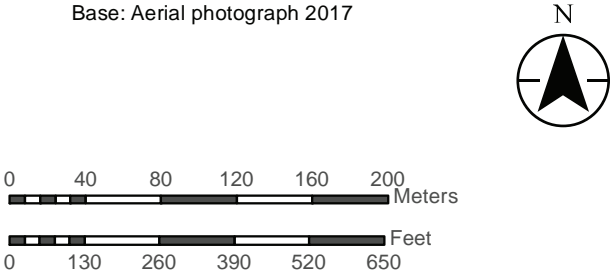
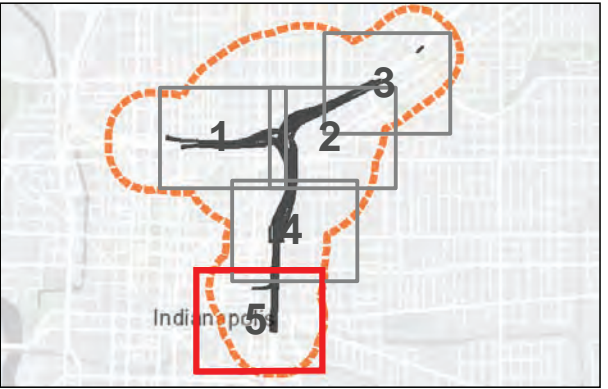
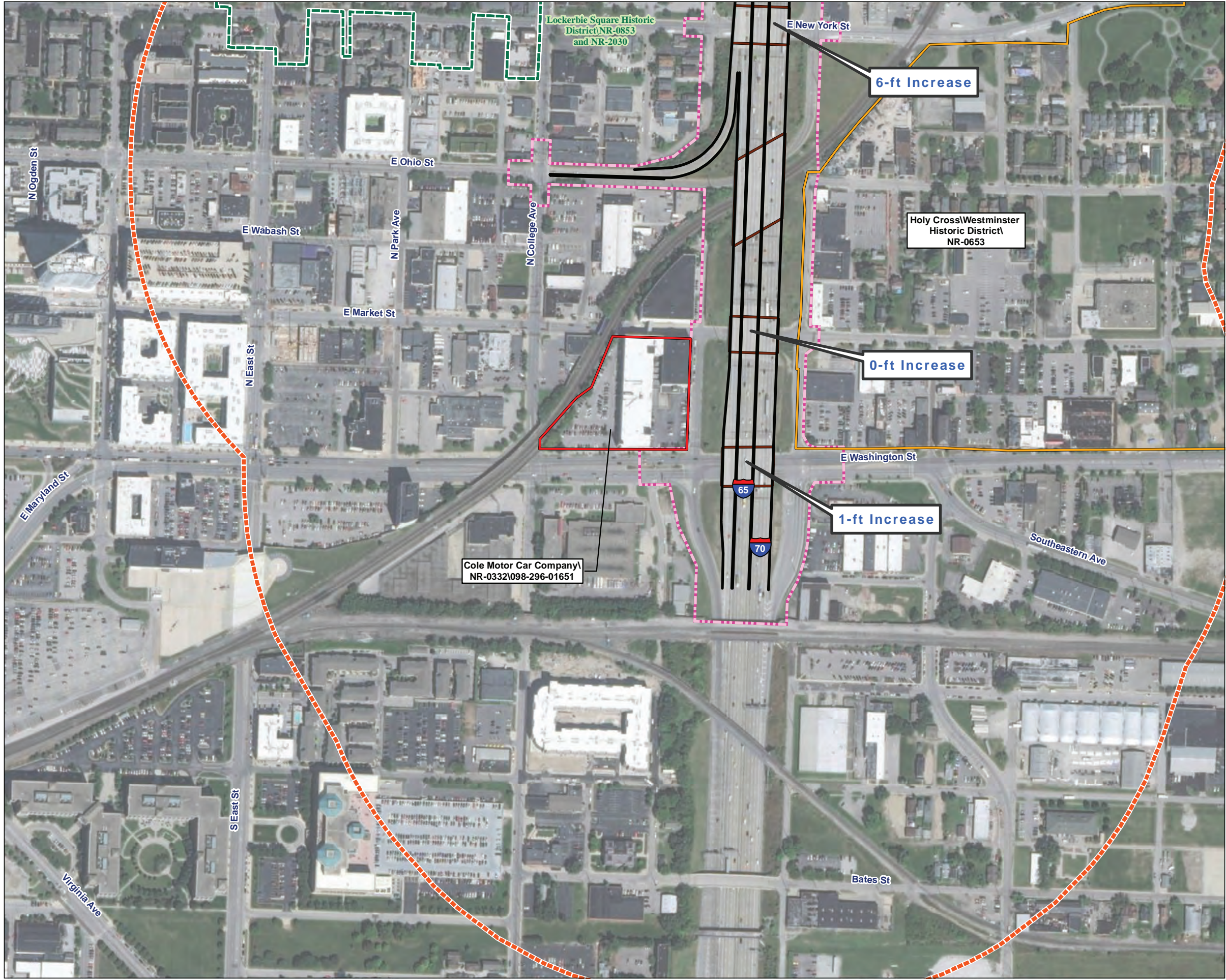


Figure 4 **Sheet 4 of 5**
Aerial photograph showing anticipated elevation changes of the North Split Project. (5 Sheets)

Created by JVT; last saved: 11/22/2019 11:53:04 AM



- North Split Project APE
- Proposed Bridge
- Proposed Shoulder Edge
- Proposed Project Limits
- NRHP Listed Property
- NRHP eligible Historic District
- NRHP/IRHSS listed Historic District

Note: Only the affected properties/historic districts are displayed on this map.

Base: Aerial photograph 2017

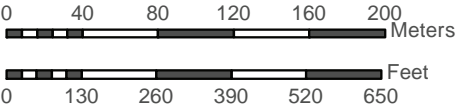
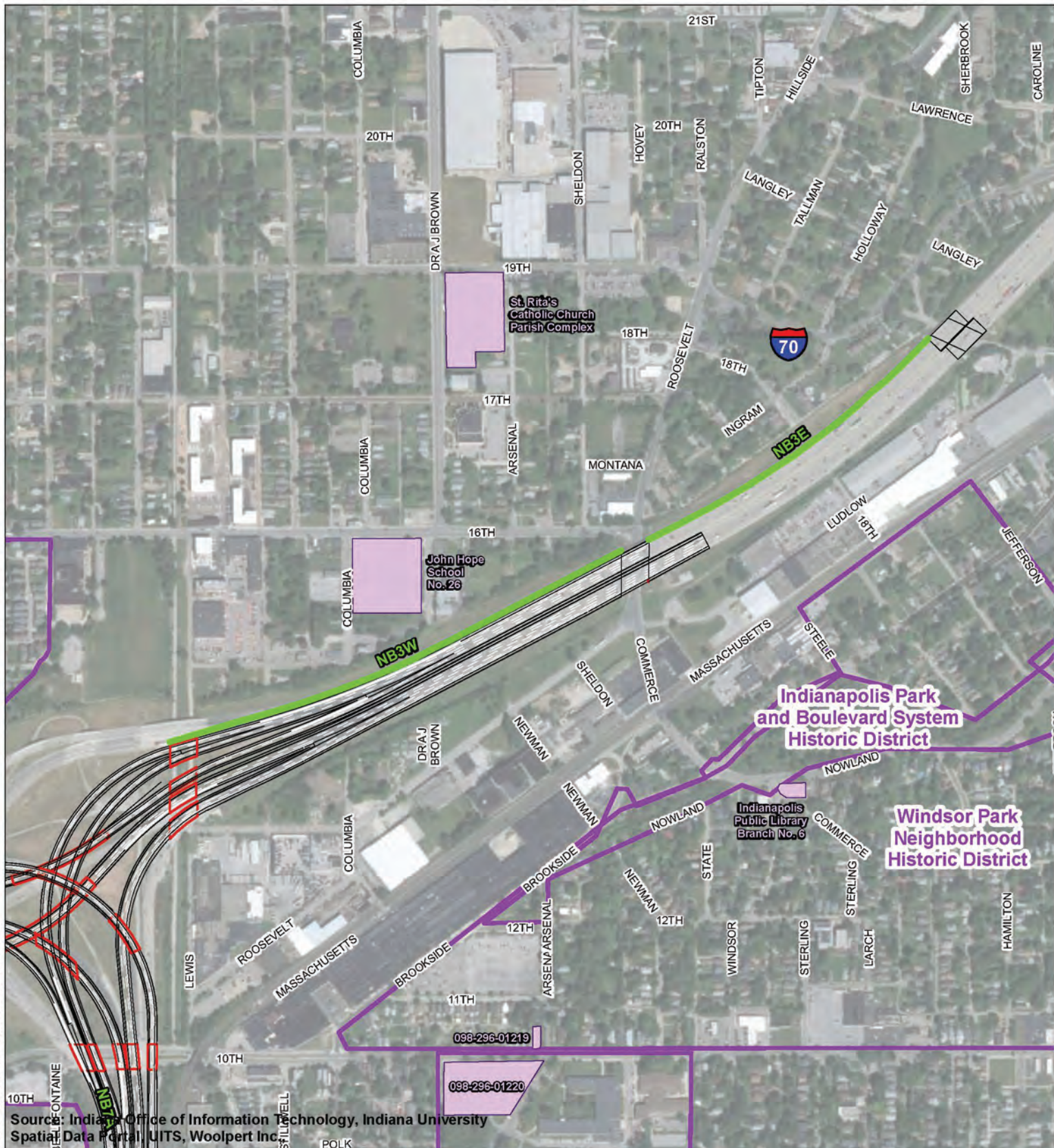





Figure 4 **Sheet 5 of 5**
Aerial photograph showing anticipated elevation changes of the North Split Project. (5 Sheets)



Legend

-  Historic Property
-  Historic District
-  Feasible and Reasonable Noise Barrier

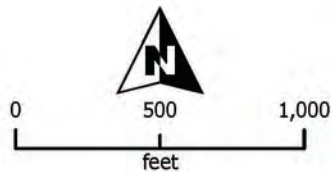
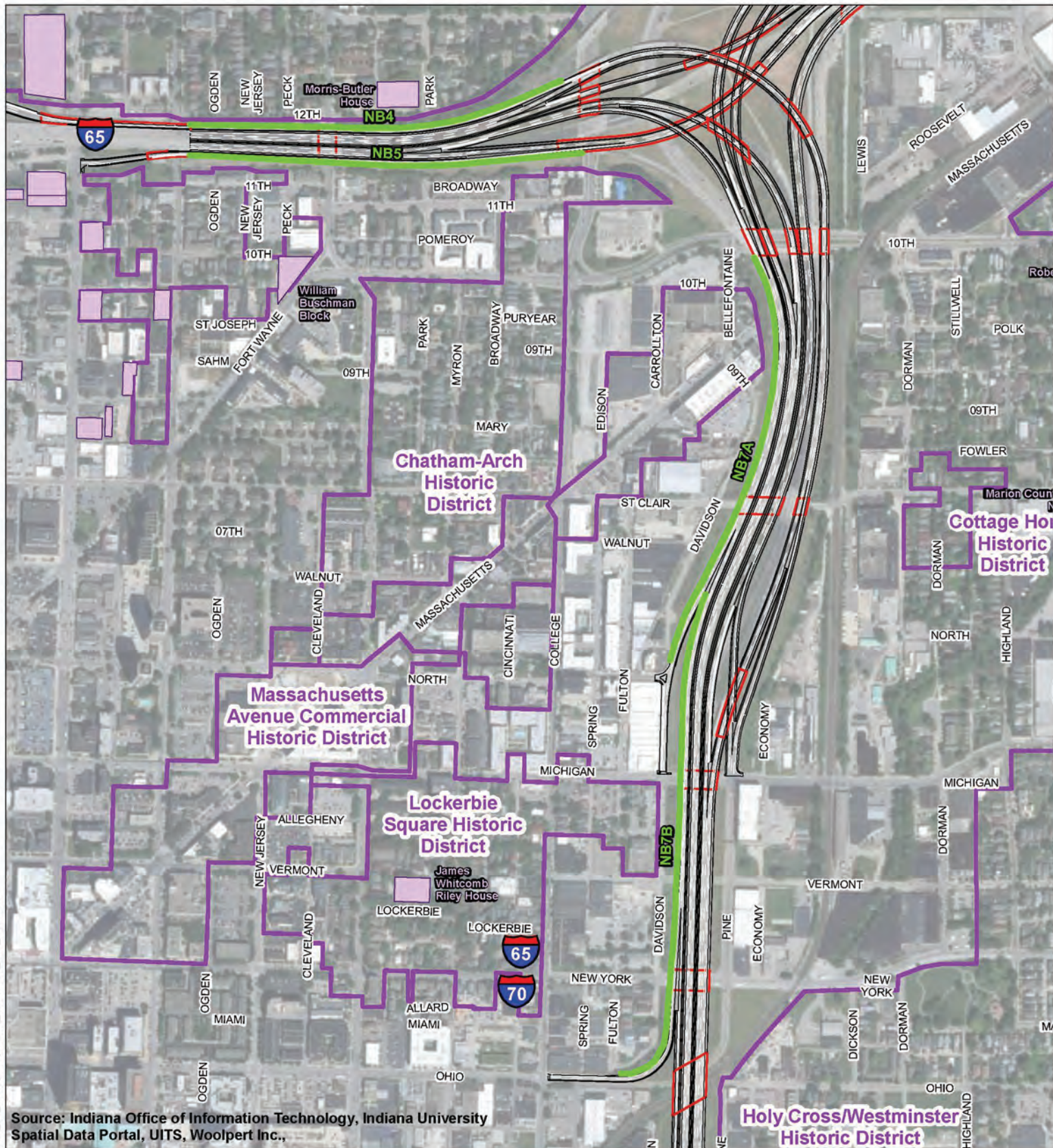


Figure 5 **North Split**
Historic Properties and Districts
Des No. 1592385 and 1600808





Sheet 2 of 3

Marion County, IN
Revised: 11/5/2019



Source: Indiana Office of Information Technology, Indiana University Spatial Data Portal, UITS, Woolpert Inc.,

Legend

-  Bridge
-  Historic Property
-  Historic District
-  Feasible and Reasonable Noise Barrier

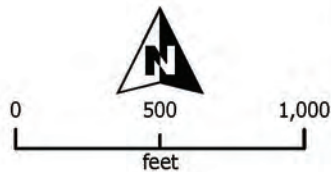


Figure 5

Sheet 3 of 3

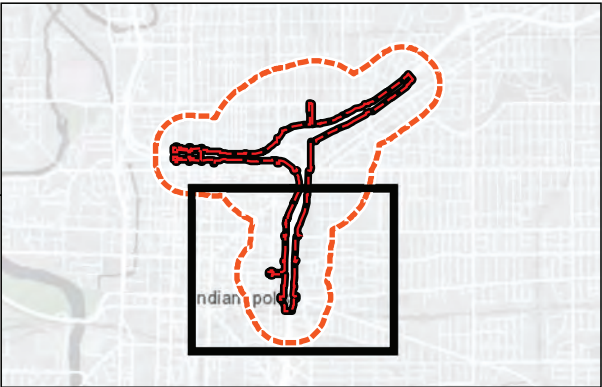
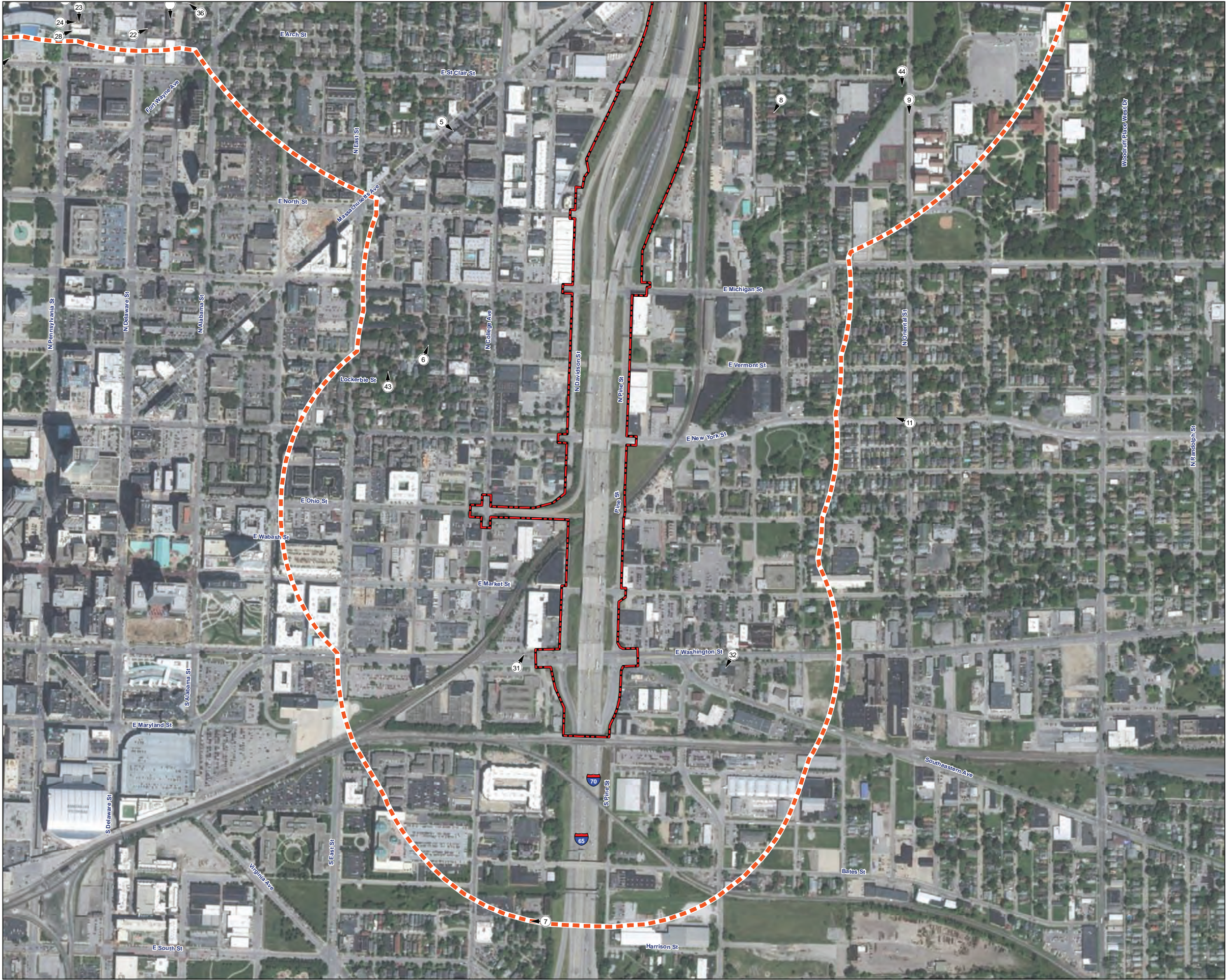
North Split Historic Properties and Districts

Des No. 1592385 and 1600808

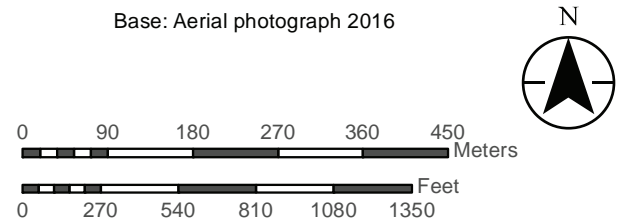
Marion County, IN
Revised: 9/18/2019

APPENDIX B: PHOTOGRAPHS

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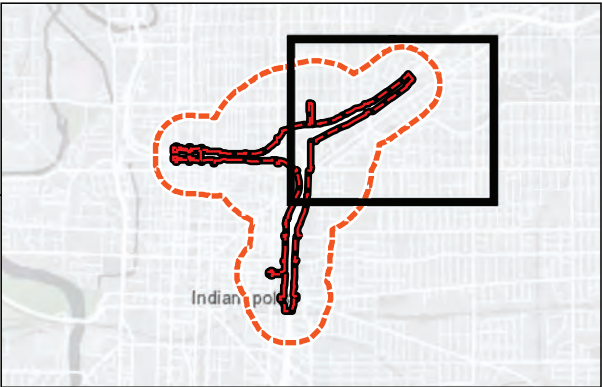
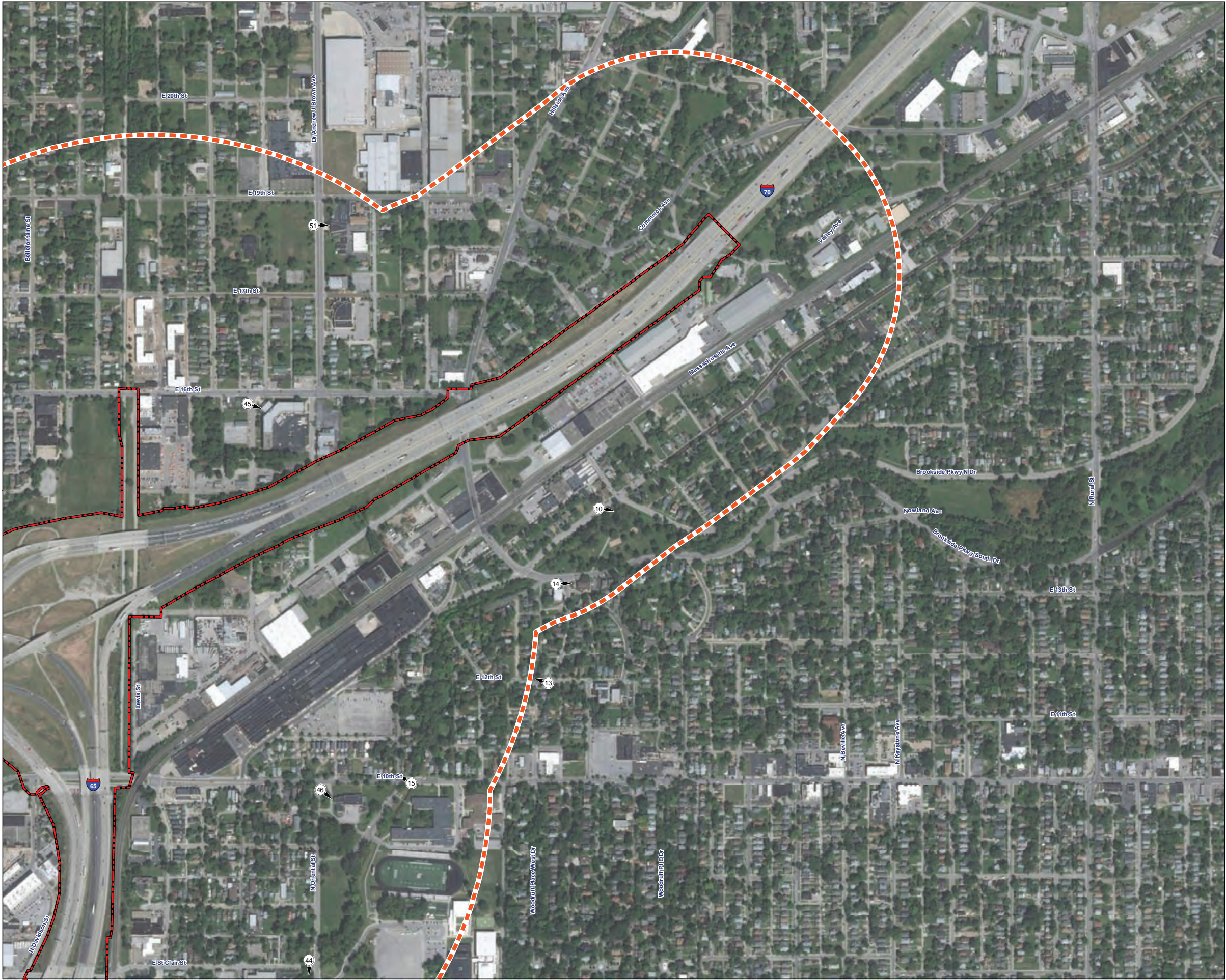
- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Photograph location



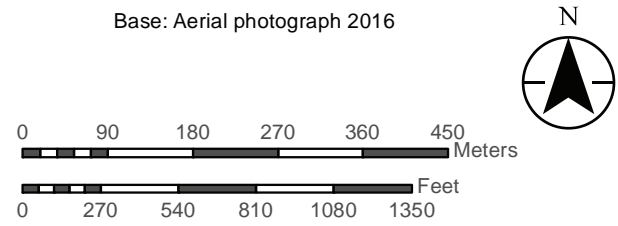
Appendix B **Sheet 2 of 3**

Aerial photograph showing the I-65/I-70 North Split Interchange Interchange Project, Indianapolis, Marion County (Des. Nos. 1592385 and 1600808) photograph locations. (10 Sheets)

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- I-65/I-70 North Split Interchange Reconstruction Project Area
- I-65/I-70 North Split Interchange Reconstruction Project APE
- Photograph location



Appendix B Sheet 3 of 3

Aerial photograph showing the I-65/I-70 North Split Interchange Interchange Project, Indianapolis, Marion County (Des. Nos. 1592385 and 1600808) photograph locations. (10 Sheets)



Photo 1. Herron-Morton Place Historic District, N. Central Avenue north of E. 16th Street, looking northwest.



Photo 2. Old Northside Historic District, corner of N. Park Avenue and E. 15th Street, looking northeast.



Photo 3. Saint Joseph Neighborhood Historic District, E. 10th Street at N. Alabama Street, looking northwest.



Photo 4. Chatham-Arch Historic District, N. College Avenue at E. 10th Street, looking southwest.



Photo 5. Massachusetts Avenue Commercial Historic District, 719–725 Massachusetts Avenue, looking southeast.



Photo 6. Lockerbie Square Historic District, N. Park Avenue at E. Vermont Street, looking northeast.



Photo 7. Fletcher Place Historic District, Lord Street at Davidson Street, looking west.



Photo 8. Cottage Home Historic District, Dorman Street south of E. St. Clair Street, looking southwest.



Photo 9. Arsenal Technical High School Historic District, Old Shop Building (IHSSI #098-296-23007), looking south-southeast from N. Oriental Street.



Photo 10. Indianapolis Park and Boulevard System Historic District, Spades Place, looking east-southeast from E. Brookside Avenue.



Photo 11. Holy Cross/Westminster Historic District, E. New York Street at N. Oriental Street, looking northwest.



Photo 12. Saints Peter and Paul Cathedral Parish Historic District, Cathedral of Saints Peter and Paul (IHSSI #098-296-01345), 1341 N. Meridian Street.



Photo 13. Windsor Park Neighborhood Historic District,
Streetscape of 12th Street, looking northwest.



Photo 14. Indianapolis Public Library Branch No. 6 (NR-2410;
IHSSI #098-296-01173), 1801 Nowland Avenue.



Photo 15. Prosser House (NR-0090; IHSSI #098-296-01219), 1454 E. 10th Street.



Photo 16. View of the façade (west elevation) of the Bals-Wocher House (NR-0146; IHSSI #098-296-01375), located at 951 N. Delaware Street.



Photo 17. Wyndham (NR-0616.33; IHSSI #098-296-01367), 1040 N. Delaware Street.



Photo 18. Pierson-Griffiths House (NR-0203; IHSSI #098-296-01368), 1028 N. Delaware Street.



Photo 19. Calvin I. Fletcher House (NR-0694; IHSSI #098-296-01369), 1031 N. Pennsylvania Street.



Photo 20. Pennsylvania Apartments (NR-0616.26; IHSSI #098-296-01379), 919 N. Pennsylvania Street.



Photo 21. The Myrtle Fern (NR-0616.25; IHSSI #098-296-01389), 221 E. 9th Street.



Photo 22. The Shelton (NR-0616.23; IHSSI #098-296-01390), 825 N. Delaware Street.



Photo 23. Cathcart Apartments (NR-0616.09; IHSSI #098-296-01391), 103 E. 9th Street.



Photo 24. Lodge Apartments (NR-0616.19; IHSSI #098-296-01392), 829 N. Pennsylvania Street.



Photo 25. Plaza Apartments (NR-0616.27; IHSSI #098-296-01393),
902 N. Pennsylvania Street.



Photo 26. The Ambassador (NR-0616.03; IHSSI #098-296-01394),
39 E. 9th Street.



Photo 27. Central Library of Indianapolis-Marion County Public Library (NR-0085; IHSSI #098-296-01395), 40 E. St. Clair Street.



Photo 28. The Burton (NR-0616.08; IHSSI #098-296-01396), 821–823 N. Pennsylvania Street.



Photo 29. The Vera and The Olga (NR-0725; IHSSI #098-296-01415), 1440–1446 N. Illinois Street.



Photo 30. Independent Turnverein (NR-0641; IHSSI #098-296-01428), 902 N. Meridian Street.



Photo 31. Cole Motor Car Company (NR-0332; IHSSI #098-296-01651), 730 E. Washington Street.



Photo 32. Gaseteria, Inc. (NR-2266), 1031 E. Washington Street.



Photo 33. Manchester Apartments (NR-1406), 960–962 N. Pennsylvania Street, on the right and Sheffield Inn (NR-1373), 956–958 N. Pennsylvania Street, on the left.



Photo 34. Sheffield Inn (NR-1373), 956–958 N. Pennsylvania Street, on the left, and Manchester Apartments (NR-1406), 960–962 N. Pennsylvania Street, on the right.



Photo 35. View of the façade (west elevation) and side (north elevation) of Delaware Court apartment building (NR-0616.11; IHSSI #098-296-01370), 1005 N. Delaware Street.



Photo 36. View of the façade (east elevation) and side (south elevation) of The Spink (Renaissance Tower Historic Inn) [NR-0616.28; IHSSI #098-296-01385], 230 E. 9th Street.



Photo 37. View of the façade (east elevation) of the William Buschman Block (NR-0897; IHSSI #098-296-01353), 968–972 Fort Wayne Avenue.



Photo 38. View of the façade (east elevation) and side (north elevation) of the Morris-Butler House (NR-2027; IHSSI #098-296-14219), 1204 E. 12th Street.



Photo 39. View of the John W. Schmidt House (The Propylaeum) [NR-2043; IHSSI #098-296-14063], 1410 N. Delaware Street.



Photo 40. View of the façade (east elevation) and side (north elevation) of Pearson Terrace (NR-0695; IHSSI #098-296-01373), 928–940 N. Alabama Street.



Photo 41. School #27—Charity Dye Elementary School (NR-1560; IHSSI #098-296-01309), 545 E. 17th Street, detail of nineteenth century façade.



Photo 42. View of the façade and south elevation of the Benjamin Harrison Home/Presidential Site (NR-2066; IHSSI #098-296-14057), 1230 N. Delaware Street.



Photo 43. View of the façade (south elevation) of the James Whitcomb Riley House (NR-2067; IHSSI #098-296-20038), 528 Lockerbie Street.



Photo 44. Marion County Bridge No. 2520L (HB-2611), N. Oriental Street over Pogue's Run, curved corner and railing at N. Oriental Street and E. St. Clair Street.



Photo 45. John Hope School No. 26 (IHSSI #098-296-01212), 1301 E. 16th Street, detail of main entrance and office wing.



Photo 46. James E. Roberts School No. 97 (IHSSI #098-296-01220), 1401 E. 10th Street, façade.



Photo 47. Knights of Pythias (IHSSI #098-296-01378), 941 N. Meridian Street.



Photo 48. Fame Laundry (IHSSI #098-296-01421), 1352 N. Illinois Street.



Photo 49. Stutz Motor Car Company (IHSSI #098-296-01426),
1002–1008 N. Capital Avenue, façade.



Photo 50. Martin Luther King, Jr. Park, 1702 Broadway Street,
view of the Landmark for Peace Memorial from south, looking
northwest.



Photo 51. St. Rita's Catholic Church Parish Complex,
1733 Dr. Andrew J. Brown Avenue, façade of church.

APPENDIX C: ABSTRACTS AND SUMMARIES

The full report is available on IN SCOPE.

**Historic Property Report for the
I-65/I-70 North Split Interchange Reconstruction Project
(Des. Nos. 1592385 and 1600808) in
Indianapolis, Marion County, Indiana**

By

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Leah J. Konicki, Principal Investigator

**Lead Agency: Federal Highway Administration and
Indiana Department of Transportation**

December 29, 2017



MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Corporation (HNTB), has completed a historic properties report (HPR) for the proposed I-65/I-70 North Split Interchange Reconstruction Project (Des. Nos. 1592385 and 1600808) in Indianapolis, Marion County, Indiana. This report documents the identification and evaluation efforts for properties included in the Area of Potential Effects (APE) for this project. Aboveground resources located within the project APE were identified and evaluated in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966, as amended, and the regulations implementing Section 106 (36 CFR Part 800).

As a result of the NHPA, as amended, and CFR Part 800, federal agencies are required to take into account the impact of federal undertakings upon historic properties in the area of the undertaking. Historic properties include buildings, structures, sites, objects, and/or districts that are eligible for or listed in the National Register of Historic Places (NRHP) and/or the Indiana Register of Historic Sites and Structures (IRHSS). All properties listed in the NRHP are automatically included in the IRHSS; however, some properties are listed only in the IRHSS. Because this project is receiving funding from the Federal Highway Administration (FHWA), it is subject to a Section 106 review.

The survey examined all buildings and structures within the APE. NRHP regulations establish a minimum age of 50 years for a building to be generally eligible for the NRHP, although for the purpose of this survey, properties built by 1971 were considered for NRHP eligibility, which include buildings that will be 50 years old at the time of the anticipated contract issuance in 2021.

All buildings and structures meeting the age criteria were photographed, recorded on maps, and evaluated for NRHP eligibility. This included:

- Ten existing NRHP-listed historic districts
- Twenty-seven individually NRHP-listed resources
- One resource determined NRHP eligible
- One IRHSS-listed historic district that is not listed in the NRHP
- Two individually IRHSS-listed resources that are not listed in the NRHP
- Two National Historic Landmarks (NHL)
- One NRHP eligible bridge
- Seven resources recommended individually eligible
- Two recommended eligible NRHP districts

The 10 NRHP-listed historic districts retain their integrity, and no change to their NRHP status is recommended. The historic district listed only in the IRHSS is recommended to be eligible for inclusion in the NRHP. The two NHL resources are located within NRHP-listed historic districts and retain a high level of integrity; no change in their NHL status is recommended. No change in the NRHP status is recommended for the individually NRHP-listed resources. One bridge has previously been determined eligible for inclusion in the NRHP; no change in its NRHP-eligible status is recommended (see list below). As a result of this study, two historic districts are recommended as eligible for inclusion in the NRHP. In addition, eight individual resources,

including one previously listed individually in the IRHSS, are recommended as eligible for inclusion in the NRHP.

NRHP-listed Historic Districts

- Herron-Morton Place Historic District
- Old Northside Historic District
- Saint Joseph Neighborhood Historic District
- Chatham-Arch Historic District
- Massachusetts Avenue Commercial Historic District
- Lockerbie Square Historic District
- Fletcher Place Historic District
- Cottage Home Historic District
- Arsenal Technical High School Historic District
- Indianapolis Park and Boulevard System Historic District

Individually NRHP-listed Resources

- Indianapolis Public Library Branch No. 6 (NR-2410; IHSSI # 098-296-01173)
- Prosser House (NR-0090; IHSSI # 098-296-01219)
- Bals-Wocher House (NR-0146; IHSSI # 098-296-01375)
- Wyndham (NR-0616.33; IHSSI # 098-296-01367)
- Pierson-Griffiths House (Kemper House) [NR-0203; IHSSI # 098-296-01368]
- Calvin I. Fletcher House (NR-0694; IHSSI # 098-296-01369)
- Pennsylvania Apartments (NR-0616.26; IHSSI # 098-296-01379)
- The Myrtle Fern (NR-0616.25; IHSSI # 098-296-01389)
- The Shelton (NR-0616.23; IHSSI # 098-296-01390)
- Cathcart Apartments (NR-0616.09; IHSSI # 098-296-01391)
- Lodge Apartments (NR-0616.19; IHSSI # 098-296-01392)
- Plaza Apartments (NR-0616.27; IHSSI # 098-296-01393)
- The Ambassador (NR-0616.03; IHSSI # 098-296-01394)
- Central Library of Indianapolis-Marion County Public Library (NR-0085; IHSSI # 098-296-01395)
- The Burton (NR-0616.08; IHSSI # 098-296-01396)
- The Vera and The Olga (NR-0725; IHSSI # 098-296-01415)
- Independent Turnverein (NR-0641; IHSSI # 098-296-01428)
- Cole Motor Car Company (NR-0332; IHSSI # 098-296-01651)
- Gaseteria, Inc. (NR-2266)
- Manchester Apartments (NR-1406)
- Sheffield Inn (NR-1373)
- Delaware Court (NR-0616.11; IHSSI # 098-296-01370)
- The Spink (Renaissance Tower Historic Inn) [NR-0616.28; IHSSI # 098-296-01385]
- William Buschman Block (NR-0897; IHSSI # 098-296-01353)

- Morris-Butler House (NR-2027; IHSSI # 098-296-14219)
- John W. Schmidt House (The Propylaeum) [NR-2043; IHSSI # 098-296-14063]
- Pearson Terrace (NR-0695; IHSSI # 098-296-01373)

NRHP Determined Eligible Resource

- Martin Luther King, Jr. Park

IRHSS Listed Resources

- School #27–Charity Dye Elementary School (NR-1560; IHSSI # 098-296-01309)
- General Motors Buick Showroom Building (NR-0956)
- Holy Cross/Westminster Historic District

National Historic Landmarks (NHL)

- Benjamin Harrison Home/Presidential Site (NR-2066; IHSSI # 098-296-14057)
- James Whitcomb Riley House (NR-2067; IHSSI # 098-296-20038)

NRHP Eligible Bridge

- Marion County Bridge No. 2520L; NBI No. 4900233

Individual Resources Recommended Eligible

- John Hope School No. 26 (IHSSI # 098-296-01212)
- James E. Roberts School No. 97 (IHSSI # 098-296-01220)
- School #27–Charity Dye Elementary School (NR-1560; IHSSI # 098-296-01309)
- Knights of Pythias (IHSSI # 098-296-01378)
- Fame Laundry (IHSSI # 098-296-01421)
- Stutz Motor Car Company (IHSSI # 098-296-01426)
- St. Rita’s Catholic Church Parish Complex (AL062)

Historic Districts Recommended Eligible for NRHP

- Saints Peter and Paul Cathedral Parish Historic District
- Windsor Park Neighborhood Historic District

CONCLUSIONS

All or portions of 10 NRHP-listed historic districts and one IRHSS-listed historic district fall within the APE; all of these historic districts retain integrity. The IRHSS-listed historic district is recommended to be eligible for inclusion on the NRHP.

- Herron-Morton Place
- Old Northside
- Saint Joseph Neighborhood
- Chatham-Arch
- Massachusetts Avenue Commercial
- Lockerbie Square
- Fletcher Place

- Cottage Home
- Arsenal Technical High School
- Indianapolis Park and Boulevard System
- Holy Cross/Westminster (IRHSS-listed and recommended NRHP-eligible)

Two NHLs are within the APE, and are located in the Old Northside and Lockerbie Square NRHP-listed historic districts. Both structures retain integrity.

- Benjamin Harrison Home/Presidential Site (NR-2066; IHSSI # 098-296-14057)
- James Whitcomb Riley House (NR-2067; IHSSI # 098-296-20038)

The following 27 resources are located in the APE, are individually listed in the NRHP but located outside of NRHP- and IRHSS-historic districts, and retain integrity:

- Indianapolis Public Library Branch No. 6 (NR-2410; IHSSI # 098-296-01173)
- Prosser House (NR-0090; IHSSI # 098-296-01219)
- Bals-Wocher House (NR-0146; IHSSI # 098-296-01375)*
- Wyndham (NR-0616.33; IHSSI # 098-296-01367)
- Pierson-Griffiths House (Kemper House) [NR-0203; IHSSI # 098-296-01368]
- Calvin I. Fletcher House (NR-0694; IHSSI # 098-296-01369)
- Pennsylvania Apartments (NR-0616.26; IHSSI # 098-296-01379)
- The Myrtle Fern (NR-0616.25; IHSSI # 098-296-01389)
- The Shelton (NR-0616.23; IHSSI # 098-296-01390)
- Cathcart Apartments (NR-0616.09; IHSSI # 098-296-01391)
- Lodge Apartments (NR-0616.19; IHSSI # 098-296-01392)
- Plaza Apartments (NR-0616.27; IHSSI # 098-296-01393)
- The Ambassador (NR-0616.03; IHSSI # 098-296-01394)
- Central Library of Indianapolis-Marion County Public Library (NR-0085; IHSSI # 098-296-01395)
- The Burton (NR-0616.08; IHSSI # 098-296-01396)
- The Vera and The Olga (NR-0725; IHSSI # 098-296-01415)
- Independent Turnverein (NR-0641; IHSSI # 098-296-01428)
- Cole Motor Car Company (NR-0332; IHSSI # 098-296-01651)
- Gaseteria, Inc. (NR-2266)
- Manchester Apartments (NR-1406)
- Sheffield Inn (NR-1373)
- Delaware Court (NR-0616.11; IHSSI # 098-296-01370)*
- The Spink (Renaissance Tower Historic Inn) [NR-0616.28; IHSSI # 098-296-01385]*
- William Buschman Block (NR-0897; IHSSI # 098-296-01353)*
- Morris-Butler House (NR-2027; IHSSI # 098-296-14219)*
- John W. Schmidt House (The Propylaeum) [NR-2043; IHSSI # 098-296-14063]*
- Pearson Terrace (NR-0695; IHSSI # 098-296-01373)*

*Note: These resources are located within a NRHP-listed historic district.

One property was recently determined eligible for listing in the NRHP.

- Martin Luther King, Jr. Park, 17th Street to 21st Street (S to N) and Park Avenue to Broadway Street (W to E)

One bridge located in the APE outside of a historic district has been determined eligible for inclusion in the NRHP through the Indiana Historic Bridge Inventory and retains integrity. For purposes of the Indiana Historic Bridge Inventory, the bridge was given a rating of non-select.

- Marion County Bridge No. 2520L; NBI No. 4900233

Two historic districts, not previously recorded in the NRHP or IRHSS, are recommended as eligible for inclusion in the NRHP under Criteria A and C and Criteria Consideration A. One is the Windsor Park Neighborhood, which is recommended eligible for inclusion under Criteria A and C; and the second is the Saints Peter and Paul Cathedral Parish Historic District, which consists of the following resources:

- Cathedral of Saints Peter and Paul (IHSSI # 098-296-01345), 1341 N. Meridian Street
- SS Peter and Paul Rectory (IHSSI # 098-296-01344), 1347 N. Meridian Street
- SS Peter and Paul School (IHSSI # 098-296-01343), 1350 N. Pennsylvania Street
- Cathedral High School (IHSSI # 098-296-01419), 1400 N. Meridian Street
- St. Agnes Academy (IHSSI # 098-296-01420), 1350 N. Meridian Street.

The following seven resources located outside of a historic district are recommended individually eligible for inclusion in the NRHP:

- John Hope School No. 26 (IHSSI # 098-296-01212), Criterion C
- James E. Roberts School No. 97 (IHSSI # 098-296-01220), Criteria A and C
- School #27–Charity Dye Elementary School (NR-1560; IHSSI # 098-296-01309), Criteria A and C
- Knights of Pythias (IHSSI # 098-296-01378), Criterion C
- Fame Laundry (IHSSI # 098-296-01421), Criterion C
- Stutz Motor Car Company (IHSSI # 098-296-01426), Criteria A and C
- St. Rita's Catholic Church Parish Complex (AL062), 1733 Dr. Andrew J. Brown Avenue

The remaining resources located in the APE outside of a historic district lack significance and/or integrity and are recommended to be not eligible for inclusion in the NRHP. The General Motors Buick Showroom Building (NR-0956) is listed in the IRHSS, but has undergone alterations that has diminished its integrity.

The full report is available on IN SCOPE.

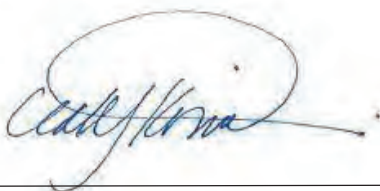
**Addendum to
Historic Property Report for the
I-65/I-70 North Split Interchange Project
(Des. Nos. 1592385 and 1600808) in
Indianapolis, Marion County, Indiana**

By

Leah J. Konicki

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Leah J. Konicki, Principal Investigator

**Lead Agency: Federal Highway Administration and
Indiana Department of Transportation**

September 19, 2018



MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Corporation (HNTB), completed an addendum to the Historic Property Report (HPR) for the proposed I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) in Indianapolis, Center Township, Marion County, Indiana. The HPR was released and consulting parties notified of its availability on September 19, 2017; the Indiana State Historic Preservation Officer (SHPO) concurred with the findings in the report by letter dated February 8, 2018 (DHPA 21534). This addendum does not change any of the findings of the original report. The addendum report documents the identification and evaluation efforts for properties included in the Expanded Area of Potential Effects (Expanded APE) for this project, which is divided into 12 segments. This HPR addendum is independent of any alternative selected, and does not mean that a specific build alternative has been selected. The expanded APE was discussed at a meeting with the SHPO on December 7, 2017, and at the January 26, 2018, Consulting Parties (CP) meeting. Traffic models indicated these segments could see a meaningful temporary increase in truck traffic during the construction phase of the project if there is a full closure of the North Split interchange. Full closure of the interchange is anticipated to be a worst-case scenario for truck traffic diversion during construction. The 12 segments are:

1. Fall Creek Parkway Segment from 38th Street south to College Avenue
2. College Avenue Segment from Fall Creek Parkway south to original APE
3. West Street Segment from the I-65 interchange south to the I-70 interchange
4. Missouri Street Segment from West Street south to the I-70 interchange
5. Pennsylvania Street Segment south from original APE to Madison Avenue
6. Madison Avenue Segment from Pennsylvania Street to I-70
7. St. Clair Street Segment from original APE west to West Street
8. Fort Wayne Avenue Segment from original APE south to St. Clair Street
9. East Street Segment from original APE south to original APE
10. Washington Street Segment from Rural Street west to original APE
11. Rural Street Segment from the I-70 interchange south to Washington Street
12. Massachusetts Avenue Segment from original APE east to Rural Street

Identification of aboveground resources within the Expanded APE was completed using a two-step approach. Step 1 involved surveying the existing right-of-way of each segment as described above to identify historic or unique features, including brick or stone streets, limestone curbs, stone walls, historic bridges, and any other features that would contribute to a historic property, if present. These types of features, if present, could potentially be affected by heavy trucks diverted during construction. No improvements are planned for these segments at this time. Following Step 1 survey, in Step 2, segments with any of the unique features noted above were reviewed to determine if the features are contributing to a National Register of Historic Places (NRHP)-listed or NRHP-eligible historic district or property.

The Step 1 survey identified three segments with one or more of the unique features outlined above; i.e., the College Avenue Segment, the Rural Street Segment, and the Massachusetts Avenue Segment. In Step 2, aboveground resources to which the identified unique features might contribute were identified and evaluated in accordance with Section 106, National

Historic Preservation Act (NHPA) of 1966, as amended, and the regulations implementing Section 106 (36 CFR Part 800).

As a result of the NHPA, as amended, and CFR Part 800, federal agencies are required to take into account the impact of federal undertakings upon historic properties in the area of the undertaking. Historic properties include buildings, structures, sites, objects, and/or districts that are eligible for or listed in the NRHP and/or the Indiana Register of Historic Sites and Structures (IRHSS). All properties listed in the NRHP are automatically included in the IRHSS; however, some properties are listed only in the IRHSS. Because this project is receiving funding from the Federal Highway Administration (FHWA), it is subject to a Section 106 review.

NRHP regulations establish a minimum age of 50 years for a building to be generally eligible for the NRHP, although for the purpose of this survey, properties built by 1971 were considered for NRHP eligibility so as to include buildings that will be 50 years old at the time of the anticipated project letting in 2021.

The three aboveground resources that were examined within these three segments are: Marion County Bridge No. 1803F (IHSSI No. 098-296-00741) in the College Avenue Segment; Marion County Bridge No. 2514F over Pogue's Run in the Rural Street Segment; and the buildings adjoining brick pavement at Massachusetts Avenue and Valley Avenue in the Massachusetts Avenue Segment. The buildings adjoining the brick pavement at Massachusetts Avenue and Valley Avenue were determined to be not eligible for the NRHP. Marion County Bridge No. 1803F is a contributing resource in the Indianapolis Park & Boulevard System Historic District, and is listed in the Indiana Historic Bridge Inventory as historic and Select. Marion County Bridge No. 2514F is also a contributing resource in the Indianapolis Park & Boulevard System Historic District, and was also identified in the Indiana Historic Bridge Inventory as historic and Select. These two historic properties identified in the expanded APE may be affected by the temporary diversion of truck traffic during construction.

CONCLUSIONS

ASC Group, Inc., under contract with HNTB, has completed an Addendum to the Historic Property Report for the I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808). Twelve segments of roadway comprising the Expanded APE for this project were evaluated for the presence of unique features such as brick or stone streets, limestone curbs, stone walls or other potentially contributing features, including bridges. For the nine segments of the Expanded APE listed below, no unique features or bridges were identified.

- Fall Creek Parkway Segment
- West Street Segment
- Missouri Street Segment
- Pennsylvania Street Segment
- Madison Avenue Segment
- St. Clair Street Segment
- Fort Wayne Avenue Segment
- East Street Segment
- Washington Street Segment

Three segments of the Expanded APE, listed below, were found to contain such features and were elevated to a Step 2 evaluation.

- College Avenue Segment
- Rural Street Segment from the I-70 interchange south to Washington Street
- Massachusetts Avenue Segment from original APE east to Rural Street

A bridge is located in the College Avenue Segment at N. College Avenue at Fall Creek: Marion County Bridge No. 1803F (IHSSI No.098-296-00741). This bridge is a contributing resource in the NRHP-listed Indianapolis Park & Boulevard System historic district and was rated Outstanding in the IHSSI.

In the Rural Street Segment, Marion County Bridge No. 2514F at Rural Street over Pogue's Run is a contributing resource in the NRHP-listed Indianapolis Park & Boulevard System historic district.

In the Massachusetts Avenue Segment, brick paving was observed under the asphalt paving on Valley Avenue northeast of the intersection with Massachusetts Avenue. The Massachusetts Avenue and Valley Avenue neighborhood includes two houses previously identified as Contributing for the IHSSI, which were examined for NRHP eligibility, and the area was recommended not eligible for the NRHP. No other previously identified historic resources were identified in the Massachusetts Avenue Segment of the Expanded APE.

In conclusion, there are two historic properties identified in the expanded APE that may be affected by the temporary diversion of truck traffic during construction. These two properties are Marion County Bridge No. 1803F in the College Avenue Segment and Marion County Bridge No. 2514F in the Rural Street Segment.

**Phase Ib Archaeological Records Check and Reconnaissance Survey for the
I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) in
Indianapolis, Center Township, Marion County, Indiana**

By

**Sean P. Coughlin, MA, and
Damian Shaun Miller, MA**

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Lead Agency: Indiana Department of Transportation

December 3, 2018



Sean P. Coughlin, MA, Principal Investigator



MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Indiana, Inc., has completed a Phase Ib Archaeological Records Check and Reconnaissance Survey report for the proposed I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) in Indianapolis, Center Township, Marion County, Indiana. The project includes reconstruction of the I-65/I-70 North Split interchange as well as bridge and pavement replacement south along I-65/I-70 to the Washington Street interchange, west along I-65 to approximately Meridian Street, and east along I-70 to approximately the bridge over Valley Avenue (west of the Keystone Avenue/Rural Street interchange).

The purpose of this Phase Ib survey was to evaluate the potential for intact buried archaeological deposits to persist in the area of the interchange, specifically the infield area between the interstates. Prior to the construction of I-65 and I-70 and their interchanges, the area of the North Split, known as the Old Northside, was defined by residential neighborhoods and light industry. The Old Northside was occupied from the 1850s until the construction of the interchange beginning in 1960 and ending in 1974. The Phase Ib investigation was conducted within the I-65/I-70 North Split interchange. Ten trenches of various lengths were excavated within a 2.8-acre (1.1-hectare) area, with a maximum depth of 1.2 meters (4 feet) in order to expose and document any historic archaeological strata in the infield. In total, 50 square meters (538 square feet) was excavated.

The archaeological fieldwork was conducted in accordance with the *Indiana Cultural Resources Manual* (Indiana Department of Transportation ([INDOT] 2014) and the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology ([IDNR, DHPA] 2008) archaeology guidelines. A work plan to conduct archaeological investigations was submitted to and approved by Mitchell Zoll, Deputy State Historic Preservation Officer (SHPO) at the IDNR, DHPA, on August 29, 2017 (DHPA# 21534). Fieldwork was also in accordance with the Indiana Historic Preservation Act (312 IAC 21 and 312 IAC 22), and pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and regulations found at 36 C.F.R. Part 800. All personnel conducting field and laboratory work meet professional qualification standards. Sean P. Coughlin, MA, served as principal investigator. Erin Donovan, Scott Hipskind, Joshua Myers, and Damian Shaun Miller, MA, served as field archaeologists. Scott Hipskind and Damian Shaun Miller, MA, processed and analyzed the artifacts. Harry Nikides served as project manager.

The Phase Ib investigation of the interchange area identified site 12Ma1024, a mid-twentieth-century site that includes a cistern. Although, the cistern represents an intact archaeological feature, it is clear that the demolition of the neighborhood prior to the construction of the highway system was fairly thorough and destructive. Artifacts found in and around the cistern appear to have been deposited during the neighborhood demolition event prior to the construction of the modern highways. The site is, in effect, a trash dump associated with the mid-twentieth-century rather than with the earlier occupations of the site. The cistern itself appears to be associated with the twentieth-century occupation of the site, and it does not appear to be contemporaneous with earlier periods. Additional evidence of the large scale demolition event was found across the eastern portion of 12Ma1024, where trenches documented significant disturbance associated with the demolition of the neighborhood and the construction of the highways (e.g.,

Trench 3, Figures 19–21). Lacking intact, sealed archaeological deposits that predate the neighborhood demolition event, the cistern and associated deposits coupled with the massive disturbance documented in the eastern portion of the site, indicate 12Ma1024 possesses a very low potential probability for intact archaeological data associated with the occupation of the neighborhood versus its destruction. Data related to the mid-twentieth-century demolition event is unlikely to be considered significant to local or regional history. Because of the lack of this research potential, the site is recommended not eligible for the National Register of Historic Places (NRHP) or the Indiana Register of Historic Sites and Structures (IRHSS). No further work in the site area is recommended.

Overall the deposits were heavily disturbed by the razing and removal of the neighborhood prior to the construction of the highway system. The presence of the cistern feature indicates that some deeper intact deposits might be present in this area, but these features are isolated among the disturbance caused through demolition of the neighborhood, construction of the interstate system, and probably represent a temporal mixture of deposits given that this neighborhood was occupied almost continuously between the late 1800s to just prior to the construction of the highways beginning in the 1960s. Based on the results of this Phase Ib survey, no further work is recommended within the preliminary archaeological survey area due to the disturbances encountered during this archaeological study.

In the event that archaeological deposits or human remains are encountered during the construction phase of the project, all work must cease and archaeologists from the IDNR, DHPA and the INDOT-Cultural Resources Office (CRO) must be notified.

CONCLUSIONS AND RECOMMENDATIONS

ASC Group, Inc., under contract with HNTB Indiana, Inc., has completed a Phase Ib Archaeological Records Check and Reconnaissance Survey report for the proposed I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808) in Indianapolis, Center Township, Marion County, Indiana. One new archaeological site was located: 12Ma1024. In establishing a recommendation for eligibility for the IRHSS and the NRHP, the significance and integrity must be addressed.

Site 12Ma1024 was part of a twentieth-century neighborhood destroyed in the 1960s as part of the construction of the I-65 and I-70 interchange (North Split). The objective of this survey was to determine if there was potential for nineteenth-century deposits or early twentieth-century deposits to persist below the demolition and fill strata associated with the destruction of the neighborhood prior to the 1960s and early 1970s construction of the modern interstates. If such features or deposits were encountered, that would suggest a potential for similar levels of preservation across other portions of the proposed project limits. The findings from this investigation would then be used to guide any subsequent work recommended within the interchange based on the depth and extent of any disturbance encountered, the locations for additional work, and the types of deposits that remain and the best methods for their identification.

The 10 trenches excavated during this survey were aligned with buildings and houses depicted on Sanborn Fire Insurance maps (Figure 10). The trenches exhibited disturbance related to the removal and subsequent construction of the highway system. In Trench 10, evidence of intact deposits were identified. Overall the deposits were heavily disturbed by the razing and

removal of the neighborhood prior to the construction of the highway system. The presence of the cistern feature indicates that some intact deposits might be present in this area, but these features are isolated among the disturbance caused through demolition of the neighborhood, construction of the interstate system, and probably represent a temporal mixture of deposits given that this neighborhood was occupied almost continuously between the late 1800s to just prior to the beginning of highway construction in the 1960s. Although the cistern was intact and associated with the twentieth-century occupation of this site, the information within the cistern and in the surrounding stratigraphy does not appear to be contemporaneous with earlier periods. The data preserved at this site is connected to the mid-twentieth century occupation and demolition events and is unlikely to be considered significant to local or regional history. Because of the lack of research potential, the site is recommended not eligible for the NRHP or the IRHSS.

Based on the results of this Phase Ib survey, no further work is recommended within the interchange area due to the disturbances encountered during the preliminary archaeological study and the isolated nature of intact features without additional context. It is unlikely that the observed disturbances related to the razing and removal of the neighborhood are isolated to the interchange; it is likely that areas that cannot be assessed through this Phase Ib survey, i.e., under the current highway infrastructure, exhibit the same level of disturbance seen during this survey. Therefore, no further work is recommended for the area encompassing the preliminary archaeological survey area for the proposed I-65/I-70 North Split Interchange Project (Des. Nos. 1592385 and 1600808).

The full report is available on IN SCOPE.

INDIANA SHORT REPORT

**Phase Ia Archaeological Records Check and Reconnaissance Survey for the
Proposed I-65/I-70 North Split Interchange Reconstruction Project
(Des. Nos. 1592385 and 1600808),
City of Indianapolis, Center Township, Marion County, Indiana**

By

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June 13, 2019



Kevin Schwarz, PhD, RPA, Principal Investigator



The proposed project, I-65/I-70 North Split Project, is located in the City of Indianapolis, Center Township, Marion County, Indiana (Figures 1 and 2). The North Split Project extends south along I-65/I-70 to Washington St., west along I-65 to approximately Meridian St., and east along I-70 to the bridge over Valley Ave. The Indiana Department of Transportation (INDOT) completed an Alternatives Screening Report for the I-65/I-70 North Split Project as part of the National Environmental Policy Act (NEPA) process on September 21, 2018. The Alternative Screening Report identified Alternative 4c as the INDOT's preferred alternative. Alternative 4c, as described in the Alternatives Screening Report, has been refined since the report was published and is now referred to as the refined preliminary preferred alternate. No new right-of-way will be required for the project.

The refined preliminary alternate includes the following project elements:

- Reconstruction of the I-65/I-70 North Split interchange to correct the top four safety concerns.
- Replacement or rehabilitation of bridges throughout the survey area; replacement of the pavement through the survey area.
- Reconstruction of the Pennsylvania St. and Delaware St. exit ramps.
- Change which side of I-65 and I-70 enter the North Split from the south, eliminating the need for the interstates to cross paths from the South Split to the North Split.
- Modify the Pine St. entrance to I-65 northbound to provide a one-lane ramp on the right of I-65, replacing the existing two-lane ramp entering I-65 from the left.
- Construction of retaining walls or vegetated slopes along the interstate sideslopes.
- Landscaping within the exiting right-of-way.
- Possible construction of noise barriers.
- Traffic signal modifications at 12th St. and Pennsylvania St., 12th St. and Illinois, 11th St. and Delaware St., I-65/I-70 at Pine St. and Michigan St., and I-65/I-70 at Ohio St. and College Ave.
- Possible construction of detention ponds or other drainage treatments.
- Replacement of light poles and high mast light towers along the interstate.
- Relocation of the Intelligent Transportation System (ITS) tower within the interchange and installation of ITS signage within the survey area.
- Replacement of existing signage along the interstates and wayfinding signage along local streets.
- Relocation of overhead power lines and installation of large, metal utility poles.
- Relocation of existing utilities and storm sewers within the existing right-of-way.
- Installation of fiber optic conduits and access faults within the existing right-of-way.

The purpose of this project is to rehabilitate and improve the existing interstate facilities within the North Split project area. This is needed to correct the deteriorated bridge conditions, correct deteriorated pavement conditions, improve safety, and to improve interchange operations and reduce congestion.

Coughlin and Miller (2018; AR-49-00814) completed an archaeological investigation to evaluate the potential for intact buried archaeological deposits within the North Split interchange. Coughlin and Miller (2018) discovered that the entire area was heavily disturbed by the razing and removal of the neighborhood prior to the construction of the interstate. The authors recommended no further archaeological work within the preliminary archaeological area between the interstates in the North Split. The current archaeological survey area is based upon locations requiring additional survey as identified by the INDOT, Cultural Resources Office (INDOT, CRO).

The archaeological survey area is located in the City of Indianapolis, adjacent to either the I-65 or I-70 interstate system as they converge in downtown Indianapolis in a location known locally as the "North Split." The interstates were built on man-made berms in an area of neighborhoods that were removed completely beginning in the early 1960s for the construction of the highways. Coughlin and Miller (2018; AR-49-00814)

conducted a Phase Ib archaeological survey in the infield of the North Split, an area between where I-65 and I-70 converge on the north side of downtown Indianapolis. The survey discovered that the neighborhoods removed for the construction of the interstate system were heavily disturbed by the razing and removal of known structures. The construction of the berms supporting the interstate system has left a layer of historic deposits throughout the current archaeological survey area. An effort was made to excavate beneath these deposits to investigate the possibility that an intact horizon is not hidden beneath this layer of historic deposits. The project area length, width, and area is based upon areas requiring additional survey as identified by the INDOT, CRO and the IDNR, DHPA.

The Phase Ia archaeological reconnaissance located no archaeological sites within the project area and it is recommended that the project be allowed to proceed as planned.

The full report is available on IN SCOPE.

**Assessment of Effects Report for the
I-65/I-70 North Split Interchange Reconstruction Project
(Des. Nos. 1592385 and 1600808) in
Indianapolis, Marion County, Indiana**

By

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Leah J. Konicki, Principal Investigator

**Lead Agency: Federal Highway Administration and
Indiana Department of Transportation**

August 9, 2019



EXECUTIVE/MANAGEMENT SUMMARY

This Assessment of Effects Report documents the methodology and assessment of effects to National Register of Historic Places (NRHP)-listed and -eligible properties as part of the Section 106 process for the I-65/I-70 North Split Interchange Reconstruction Project (North Split Project) (Des. Nos. 1592385 and 1600808) in Indianapolis, Marion County, Indiana. The project includes reconstruction of the I-65/I-70 North Split interchange as well as bridge and pavement replacement south along I-65/I-70 to the Washington Street interchange, west along I-65 to approximately Meridian Street, and east along I-70 to approximately the bridge over Valley Avenue (west of the Keystone Avenue/Rural Street interchange).

Since the Federal Highway Administration (FHWA) is providing funding for the proposed project, it is subject to compliance with the National Historic Preservation Act of 1966 (NHPA), as amended (16 U.S.C. 470 et seq.), and its implementing regulations (36 CFR 800). Specifically, Section 106 of the NHPA requires FHWA, as the lead Federal agency, to consider the effects of its undertakings on historic properties.

The following resource types are within the Area of Potential Effects (APE) for this project:

- Ten NRHP-listed historic districts
- Twenty-seven individually NRHP-listed resources
- Seven individual resources determined NRHP-eligible
- Two National Historic Landmarks (NHL)
- One bridge determined individually NRHP-eligible
- Two districts determined NRHP-eligible
- Two resources that are Indiana Register of Historic Sites and Structures (IRHSS)-listed and NRHP-eligible

The following table lists the historic properties, their NRHP status, and their individual effects findings.

Assessments of effects were completed for each of the NRHP-listed and -eligible historic properties. The North Split Project would have 22 No Effect findings, 26 No Adverse Effect findings, and 3 Adverse Effect findings.

An Adverse Effect for one historic property means the entire project receives an Adverse Effect finding. As a result of the Adverse Effect findings for three resources for this project, FHWA has made a determination that the North Split Project would have an adverse effect to historic properties.

Summary of Effect Findings for the North Split Project.

NRHP No./ HB No./IHSSI No.	Name and Address of Resource	Effect Finding
NRHP-Listed Historic Districts		
NR-0438	Herron-Morton Place Historic District	No Adverse Effect
NR-0157 and NR-0716	Old Northside Historic District	Adverse Effect
NR-0926	Saint Joseph Neighborhood Historic District	No Adverse Effect
NR-0327	Chatham-Arch Historic District	Adverse Effect
NR-0525	Massachusetts Avenue Commercial Historic District	No Adverse Effect
NR-0853 and NR-2030	Lockerbie Square Historic District	No Adverse Effect
NR-0355	Fletcher Place Historic District	No Adverse Effect
NR-0965	Cottage Home Historic District	No Adverse Effect
NR-0084	Arsenal Technical High School Historic District	No Adverse Effect
NR-1711	Indianapolis Park and Boulevard System Historic District	No Adverse Effect
Individually NRHP-Listed Resources		
NR-2410/098-296-01173	Indianapolis Public Library Branch No. 6, 1801 Nowland Avenue	No Effect
NR-0090/098-296-01219	Prosser House, 1454 E. 10 th Street	No Effect
NR-0146/098-296-01375	Bals-Wocher House, 951 N. Delaware Street	No Effect
NR-0616.33/ 098-296-01367	Wyndham, 1040 N. Delaware Street	No Adverse Effect
NR-0203/098-296-01368	Pierson-Griffiths House, 1028 N. Delaware Street	No Adverse Effect
NR-0694/098-296-01369	Calvin I. Fletcher House, 1031 N. Pennsylvania Street	No Adverse Effect
NR-0616.26/ 098-296-01379	Pennsylvania Apartments, 919 N. Pennsylvania Street	No Effect
NR-0616.25/ 098-296-01389	The Myrtle Fern, 221 E. 9 th Street	No Effect
NR-0616.23/ 098-296-01390	The Shelton, 825 N. Delaware Street	No Adverse Effect
NR-0616.09/ -296-01391	Cathcart Apartments, 103 E. 9 th Street	No Effect
NR-0616.19/ 098-296-01392	Lodge Apartments, 829 N. Pennsylvania Street	No Effect
NR-0616.27/ 098-296-01393	Plaza Apartments, 902 N. Pennsylvania Street	No Effect
NR-0616.03/ 098-296-01394	The Ambassador, 39 E. 9 th Street	No Adverse Effect
NR-0085/098-296-01395	Central Library of Indianapolis-Marion County Public Library, 40 E. St. Clair Street	No Effect
NR-0616.08/ 098-296-01396	The Burton, 821-823 N. Pennsylvania Street	No Effect

Summary of Effect Findings for the North Split Project.

NRHP No./ HB No./IHSSI No.	Name and Address of Resource	Effect Finding
NR-0725/098-296-01415	The Vera and The Olga, 1440–1446 N. Illinois Street	No Effect
NR-0641/098-296-01428	Independent Turnverein, 902 N. Meridian Street	No Effect
NR-0332/098-296-01651	Cole Motor Car Company, 730 E. Washington Street	No Adverse Effect
NR-2266	Gaseteria, Inc., 1031 E. Washington Street	No Adverse Effect
NR-1406	Manchester Apartments, 960–962 N. Pennsylvania Street	No Adverse Effect
NR-1373	Sheffield Inn, 956–958 N. Pennsylvania Street	No Adverse Effect
NR-0616.11/ 098-296-01370	Delaware Court, 1005 N. Delaware Street	No Adverse Effect
NR-0616.28/ 098-296-01385	The Spink (Renaissance Tower Historic Inn), 230 E. 9 th Street	No Adverse Effect
NR-0897/098-296-01353	William Buschman Block, 968–972 Fort Wayne Avenue	No Adverse Effect
NR-2027/098-296-14219	Morris-Butler House, 1204 E. 12 th Street	Adverse Effect
NR-2043/098-296-14063	John W. Schmidt House (The Propylaeum), 1410 N. Delaware Street	No Effect
NR-0695/098-296-01373	Pearson Terrace, 928–940 N. Alabama Street	No Adverse Effect
IRHSS-Listed and NRHP-Eligible Resources		
NR-1560*/ 098-296-01309	School #27–Charity Dye Elementary School, 545 E. 17 th Street	No Effect
NR-0653*	Holy Cross/Westminster Historic District	No Adverse Effect
National Historic Landmarks		
NR-2066/098-296-14057	Benjamin Harrison Home/Presidential Site, 1230 N. Delaware Street	No Adverse Effect
NR-2067/098-296-20038	James Whitcomb Riley House, 528 Lockerbie Street	No Effect
Bridge Determined NRHP-Eligible		
HB-2611	Marion County Bridge No. 2520L, N. Oriental Street over Pogue’s Run	No Effect
Individual Resources Determined Eligible		
098-296-01212	John Hope School No. 26, 1301 E. 16 th Street	No Adverse Effect
098-296-01220	James E. Roberts School No. 97, 1401 E. 10 th Street	No Effect
098-296-01378	Knights of Pythias, 941 N. Meridian Street	No Effect
098-296-01421	Fame Laundry, 1352 N. Illinois Street	No Effect
098-296-01426	Stutz Motor Car Company, 1002–1008 N. Capital Avenue	No Effect

Summary of Effect Findings for the North Split Project.

NRHP No./ HB No./IHSSI No.	Name and Address of Resource	Effect Finding
N/A	Martin Luther King, Jr. Park, 17 th Street to 21 st Street (S to N) and Park Avenue to Broadway Street (W to E)	No Effect
N/A	St. Rita's Catholic Church Parish Complex, 1733 Dr. Andrew J. Brown Avenue	No Effect
Historic Districts Determined NRHP-Eligible		
N/A	Saints Peter and Paul Cathedral Parish Historic District	No Adverse Effect
N/A	Windsor Park Neighborhood Historic District	No Adverse Effect
*Properties listed in the IRHSS but not the NRHP are assigned NRHP numbers.		

The full report is available on IN SCOPE.

**I-65/I-70 North Split Project
Indianapolis, Indiana**

Des. Nos. 1592385 and 1600808

TRAFFIC NOISE BARRIER ADDENDUM TO ASSESSMENT OF EFFECTS REPORT

October 11, 2019



Figure 10: I-65/I-70 Embankment along Davidson Street with Noise Barrier



4 CONCLUSION

Predicted noise changes are anticipated to be minor at the historic properties within 800 feet of the proposed roadway improvements. Although most historic properties showed a decrease or only a slight increase in noise according to INDOT's noise policy, a barrier analysis was still warranted because the noise values in the noise analysis exceed the noise abatement criteria.

Four possible noise barriers were evaluated for effects to historic properties. NB4 would contribute to an Adverse Effect finding that was previously recommended for the Old Northside Historic District and the Morris-Butler House. NB5 would contribute to an Adverse Effect finding that was previously recommended for the Chatham-Arch Historic District. NB5 would also contribute to an Adverse Effect finding that was recommended in the Section 106 Update Memorandum #6 for the Saint Joseph Neighborhood Historic District. NB7 would be visible from the Massachusetts Avenue Commercial Historic District and Lockerbie Square Historic District and is anticipated to impact the characteristics that qualify these two historic districts for the NRHP in a manner that diminishes their integrity. The previously recommended No Adverse Effect findings for the Massachusetts Avenue Commercial Historic District and the Lockerbie Square Historic District will be changed to Adverse Effect if noise barriers are constructed. If noise barriers are not constructed the recommended findings for the Massachusetts Avenue Commercial Historic District and the Lockerbie Square Historic District remain No Adverse Effect. **Table 1** includes a revised summary of effect findings for the North Split Project if noise barriers are constructed.



Table 1: Summary of Effect Findings for North Split Project if Noise Barriers are Constructed

NRHP No./ HB No./IHSSI No.	Name and Address of Resource	Effect Finding
NRHP-Listed Historic Districts		
NR-0438	Herron-Morton Place Historic District	No Adverse Effect
NR-0157 and NR-0716	Old Northside Historic District	Adverse Effect
NR-0926	Saint Joseph Neighborhood Historic District	Adverse Effect
NR-0327	Chatham-Arch Historic District	Adverse Effect
NR-0525	Massachusetts Avenue Commercial Historic District	Adverse Effect
NR-0853 and NR-2030	Lockerbie Square Historic District	Adverse Effect
NR-0355	Fletcher Place Historic District	No Adverse Effect
NR-0965	Cottage Home Historic District	No Adverse Effect
NR-0084	Arsenal Technical High School Historic District	No Adverse Effect
NR-1711	Indianapolis Park and Boulevard System Historic District	No Adverse Effect
Individually NRHP-Listed Resources		
NR-2410\098-296-01173	Indianapolis Public Library Branch No. 6, 1801 Nowland Avenue	No Effect
NR-0090\098-296-01219	Prosser House, 1454 E. 10th Street	No Effect
NR-0146\098-296-01375	Bals-Wocher House, 951 N. Delaware Street	No Effect
NR-0616.33\098-296-01367	Wyndham, 1040 N. Delaware Street	No Adverse Effect
NR-0203\098-296-01368	Pierson-Griffiths House, 1028 N. Delaware Street	No Adverse Effect
NR-0694\098-296-01369	Calvin I. Fletcher House, 1031 N. Pennsylvania Street	No Adverse Effect
NR-0616.26\098-296-01379	Pennsylvania Apartments, 919 N. Pennsylvania Street	No Effect
NR-0616.25\098-296-01389	The Myrtle Fern, 221 E. 9th Street	No Effect



NRHP No./ HB No./HSSI No.	Name and Address of Resource	Effect Finding
NR-0616.23\098-296-01390	The Shelton, 825 N. Delaware Street	No Adverse Effect
NR-0616.09\098-296-01391	Cathcart Apartments, 103 E. 9th Street	No Effect
NR-0616.19\098-296-01392	Lodge Apartments, 829 N. Pennsylvania Street	No Effect
NR-0616.27\098-296-01393	Plaza Apartments, 902 N. Pennsylvania Street	No Effect
NR-0616.03\098-296-01394	The Ambassador, 39 E. 9th Street	No Adverse Effect
NR-0085\098-296-01395	Central Library of Indianapolis-Marion County Public Library 40 E. St. Clair Street	No Effect
NR-0616.08\098-296-01396	The Burton, 821–823 N. Pennsylvania Street	No Effect
NR-0725\098-296-01415	The Vera and The Olga, 1440–1446 N. Illinois Street	No Effect
NR-0641\098-296-01428	Independent Turnverein, 902 N. Meridian Street	No Effect
NR-0332\098-296-01651	Cole Motor Car Company, 730 E. Washington Street	No Adverse Effect
NR-2266	Gaseteria, Inc., 1031 E. Washington Street	No Adverse Effect
NR-1406	Manchester Apartments, 960–962 N. Pennsylvania Street	No Adverse Effect
NR-1373	Sheffield Inn, 956–958 N. Pennsylvania Street	No Adverse Effect
NR-0616.11\098-296-01370	Delaware Court, 1005 N. Delaware Street	No Adverse Effect
NR-0616.28\098-296-01385	The Spink (Renaissance Tower Historic Inn), 230 E. 9th Street	No Adverse Effect
NR-0897\098-296-01353	William Buschman Block, 968–972 Fort Wayne Avenue	No Adverse Effect



NRHP No./ HB No./IHSSI No.	Name and Address of Resource	Effect Finding
NR-2027\098-296-14219	Morris-Butler House, 1204 N. 12th Street	Adverse Effect
NR-2043\098-296-14063	John W. Schmidt House (The Propylaeum), 1410 N. Delaware Street	No Effect
NR-0695\098-296-01373	Pearson Terrace, 928–940 N. Alabama Street	No Adverse Effect
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NR-0653*	Holy Cross\Westminster Historic District	No Adverse Effect
National Historic Landmarks		
NR-2066\098-296-14057	Benjamin Harrison Home\Presidential Site, 1230 N. Delaware Street	No Adverse Effect
NR-2067\098-296-20038	James Whitcomb Riley House, 528 Lockerbie Street	No Effect
Bridge Determined NRHP-Eligible		
HB-2611	Marion County Bridge No. 2520L, N. Oriental Street over Pogue's Run	No Effect
Individual Resources Determined Eligible		
098-296-01212	John Hope School No. 26, 1301 E. 16 th Street	No Adverse Effect
098-296-01220	James E. Roberts School No. 97, 1401 E. 10 th Street	No Effect
098-296-01378	Knights of Pythias, 941 N. Meridian Street	No Effect
098-296-01421	Fame Laundry, 1352 N. Illinois Street	No Effect
098-296-01426	Stutz Motor Car Company, 1002–1008 N. Capital Avenue	No Effect
N/A	Martin Luther King, Jr. Park, 17 th Street to 21 st Street (S to N) and Park Avenue to Broadway Street (W to E)	No Effect



NRHP No./ HB No./HSSI No.	Name and Address of Resource	Effect Finding
N/A	St. Rita's Catholic Church Parish Complex, 1733 Dr. Andrew J. Brown Avenue	No Effect
Historic Districts Determined NRHP-Eligible		
N/A	Saints Peter and Paul Cathedral Parish Historic District	No Adverse Effect
N/A	Windsor Park Neighborhood Historic District	No Adverse Effect
*Properties listed in the IRHSS but not the NRHP are assigned NRHP numbers.		

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Traffic Noise Analysis Procedure, Indiana Department of Transportation, 2017.

<http://www.in.gov/indot/files/2017%20INDOT%20Noise%20Policy.pdf>

The full report is available on IN SCOPE.

**Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey for the
Proposed I-65/I-70 North Split Interchange Reconstruction Project
(Des. Nos. 1592385 and 1600808), City of Indianapolis, Center Township,
Marion County, Indiana**

By

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December 13, 2019



Kevin Schwarz, PhD, RPA, Principal Investigator



MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Indiana, Inc., has completed an Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey report for the proposed I-65/I-70 North Split Interchange Reconstruction Project (Des. Nos. 1592385 and 1600808) in the City of Indianapolis, Center Township, Marion County, Indiana. The project includes reconstruction of the I-65/I-70 North Split interchange as well as bridge and pavement replacement south along I-65/I-70 to the Washington Street interchange, west along I-65 to approximately Meridian Street, and east along I-70 to approximately the bridge over Valley Avenue (west of the Keystone Avenue/Rural Street interchange).

The archaeological fieldwork was done in compliance with the *Indiana Cultural Resource Manual* (Indiana Department of Transportation, Cultural Resources Office [INDOT, CRO] 2019) and the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (IDNR, DHPA) archaeological guidelines of 2019. Additionally, fieldwork was in acquiescence with the Indiana Historic Preservation Act (312 IAC 21 and 312 IAC 22), and consistent with Section 106 of the National Historic Preservation Act (54 U.S.C. 306108) and regulations found at 36 C.F.R. Part 800. All staff members involved met or exceeded professional qualification standards.

The Addendum Phase Ia survey resulted in the documentation of site 12Ma1062, an abandoned rail bed with associated ties and rail extending south 484.14 meters (m) [1,588.4 feet (ft)] along Lewis Street from 16th Street and the main line truncating just north of the southern underpass, with one rail line passing beneath the second underpass and curving over to 13th Street. This rail line is located in a historic industrial context. Additionally, this is the last of five rail lines left in a relatively intact context, with what appears to be a switch line for loading freight from the surrounding factories. In the northern portion of 12Ma1062, there are two historic buildings that date back to 1887 and 1915, and were associated with the rail lines. It appears that both buildings were directly involved in the loading of materials onto the railroad. Although the discovery and documentation of the switch timbers makes a small contribution to Indiana's railroad history, it does not appear that significant or important information resides at the site. Additionally, the integrity of materials at 12Ma1062 is lacking. Therefore, no further archaeological work is recommended for 12Ma1062 and the site is recommended to be not eligible for listing on the National Register of Historic Places and Indiana Register of Historic Sites and Structures. The remaining portions of the project area were already heavily disturbed by pavement, roadway and pathway buildup, and buried utilities. The areas that were accessible for shovel test pits further supported the disturbed and urbanized context of the soils with the proliferation of gravel present. No further archaeological work is recommended for these areas either.

In the event that archaeological materials or human remains are unearthed during the construction phase of the project, all work must halt and archaeologists from the IDNR, DHPA and the INDOT, CRO must be notified immediately.

CONCLUSIONS AND RECOMMENDATIONS

ASC Group, Inc., under contract with HNTB Indiana, Inc., has completed an Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey report for the proposed I-65/I-70 North Split Interchange Reconstruction Project (Des. Nos. 1592385 and 1600808) in the City of Indianapolis, Center Township, Marion County, Indiana. One new archaeological site was located, 12Ma1062.

Most of the addendum project area is already heavily disturbed by pavement, roadway and pathway buildup, and buried utilities. The areas that were accessible for STPs further supported the disturbed and urbanized context of the soils with the proliferation of gravel present. Therefore, in reference to Areas 1–7, the recommendation is that no additional work is needed and the project can proceed as planned.

Site 12Ma1062 is located in Area 8 (Figure 5, Sheets 1 and 2). It was part of a multi-railed industrial transport system that carried goods and materials from local producers to Chicago, Illinois; Louisville, Kentucky; and beyond. Out of the five rail lines that were present, plus a rail spur, there appears to be the remains of one rail line and a switch. Only scant documentation exists of the Monon Railroad in this industrial area. There are two remaining structures, which can be found on the Sanborn maps. The first structure (IHSSI # 098-296-01207) can be found on the 1887 and 1898 Sanborn maps (Figures 6 and 7). The second structure (IHSSI # 098-295-01208) can be found on the 1915 Sanborn map (Figure 8). The two structures are also documented in SHAARD.

Site 12Ma1062 was discussed above with regards to listing on the IRHSS and the NRHP; the latter under Criterion D, important information yield. The above discussion indicates that the rail line and switch represented by 12Ma1062 are lacking in significance for listing on the IRHSS and NRHP (i.e., under NHPA Criterion D), and the site's integrity is limited, due to the fact that cross-ties are the only railroad element remaining in abundance. As such, no further archaeological work is recommended for 12Ma1062. The site is recommended not eligible for listing on the IRHSS and NRHP.

APPENDIX D: LIST OF CONSULTING PARTIES

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 & 1600808
Consulting Parties List (10/22/2019)

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

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 & 1600808
Consulting Parties List (10/22/2019)

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

I-65/I-70 North Split Interchange Reconstruction
Des. Nos. 1592385 & 1600808
Consulting Parties List (10/22/2019)

Organization	Contact Name	Title	E-Mail
Property Owners	Patricia and Charles Perrin		pperrin@indy.rr.com
North Square Neighborhood Association	Jordan Ryan		jordanblairryan@gmail.com
Keep Indianapolis Beautiful, Inc.	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

APPENDIX E: CONSULTING PARTY MEETING PRESENTATIONS AND MINUTES

CONSULTING PARTIES MEETING NO. 1, OCTOBER 6, 2017

I-65/I-70 North Split Interchange Reconstruction

Section 106 Consulting Parties Meeting Agenda

Indiana Historical Society – 9:30 a.m. – 11:30 a.m. – October 6, 2017

1. Welcome & Introductions (FHWA & INDOT) (10 minutes)
2. Purpose of Meeting (HNTB) (5 minutes)
3. Section 106 Consultation Process (HNTB) (10 minutes)
 - a. What is Section 106?
 - b. Role of Consulting Party
 - c. Section 106 Steps for North Split Project
4. Project Overview (HNTB) (20 minutes)
5. Area of Potential Effects (ASC Group) (10 minutes)
6. Archaeology Update (ASC Group) (10 minutes)
7. Next Steps (HNTB) (10 minutes)
8. Consulting Party Feedback (HNTB) (15 minutes)
 - a. Other Consulting Parties
 - b. Meeting Location
 - c. Area of Potential Effects
 - d. Other
9. Questions? (20 minutes)



INDIANA DEPARTMENT OF TRANSPORTATION

MEETING SUMMARY

Date: October 6, 2017

Time: 9:30 – 11:30 a.m.

Meeting: Section 106 Consulting Parties I-65/I-70 North Split Interchange Reconstruction Project

Location: Indiana Historical Society, Indianapolis, IN

Attendees:

Name	Organization	Email
Charles Hyde	Benjamin Harrison Presidential Site	cyhde@bhpsite.org
Jim Jessee	Cottage Home Board of Directors	Jamesjessee102@gmail.com
Meredith Klekotka	Indianapolis Department of Metropolitan Development (DMD)	Meredith.klekotka@indy.gov
Chris Myers	Indianapolis Historic Preservation Commission (IHPC)	Chris.myers@indy.gov
Jason Rowley	Holy Cross Neighborhood Association	jrowley@hanson.inc.com
Kelly Wensing	Holy Cross Neighborhood Association	kellywensing@gmail.com
Mitch Zoll	Indiana Department of Natural Resources (IDNR) – Division of Historic Preservation and Archaeology	mzoll@dnr.in.gov
Chad Slider	IDNR – Division of Historic Preservation and Archaeology	cslider@dnr.in.gov
Michelle Allen	Federal Highway Administration (FHWA)	Michelle.allen@dot.gov
Laura Hilden	Indiana Department of Transportation (INDOT)	lhilden@indot.in.gov
Anuradha Kumar	INDOT	akumar@indot.in.gov
Shaun Miller	INDOT	smiller@indot.in.gov
Anthony Ross	INDOT	Aross3@indot.in.gov
Runfa Shi	INDOT	rshi@indot.in.gov
David Cleveland	Corradino Group	dcleveland@corradino.com
Sean Coughlin	ASC Group	scoughlin@ascgroup.net
Kia Gillette	HNTB	kgillette@hntb.com
Ali Hernandez	Borshoff	Ali.hernandez@borshoff.biz
Emily Kibling	Borshoff	Emily.kibling@borshoff.biz
Harry Nikides	ASC Group	hnikides@ascgroup.net
Doug Terpstra	ASC Group	dterpstra@ascgroup.net

Name	Organization	Email
Seth Schickel	HNTB	sschickel@hntb.com
Eryn Fletcher (via phone)	FHWA	Eryn.Fletcher@dot.gov
Diane Hunter (via phone)	Miami Tribe of Oklahoma	dhunter@miamination.com
David Pflugh (via phone)	Chatham Arch Neighborhood Association	canaindy@gmail.com

1. Welcome

FHWA opened the meeting by thanking consulting party representatives in attendance. FHWA explained that because federal funds were being used for the project, it must follow the Section 106 consultation process.

2. Introduction of Project Team

Project Team – Several representatives from the Project Team and INDOT were present (see attached attendee list)

Guests – Six consulting party representatives were present, while three were on the phone (see attendee list above)

3. Section 106 Consultation Process (see attached presentation)

Section 106 is part of the National Historic Preservation Act (NHPA) of 1966 and considers effects of actions on properties listed in or eligible for National Register of Historic Places (NRHP). Section 110 requires federal agencies to minimize harm to National Historic Landmarks, consider all prudent and feasible alternatives to avoid an adverse effect to them, and give the Advisory Council on Historic Preservation (ACHP) an opportunity to consult on projects.

As part of the Section 106 process, consulting parties are invited to consult on the project. Consulting parties are individuals and organizations with demonstrated legal, economic or historic preservation interest in an undertaking are formed. The consulting party reviews information about the project, provides input at different steps of the process, shares views, offers ideas and solutions, and considers possible ways to avoid, minimize, and/or mitigate effects on historic properties.

The Section 106 timeline for the I-65/I-70 North Split Reconstruction project is as follows:

- Initiate consultation – Sept/Oct 2017
- Identify historic properties – winter 2017/2018 through spring 2018
- Assess effects on historic properties – summer and fall 2018
- Resolve any adverse effects – winter 2018 through spring 2019

4. Project Overview (see attached presentation)

INDOT is proposing to reconstruct the I-65/I-70 North Split, as part of our Next Level initiative.

The I-65/I-70 North Split is one of the most heavily-traveled interchanges in the state of Indiana, accommodating about 170,000 vehicles per day and requires a complete reconstruction. Portions of the current interchange were built 50 years ago, and it is nearing the end of its useful life and operating at full capacity.

As a result, INDOT's Project Team for the I-65/I-70 North Split Reconstruction Project recently began work on the Environmental Assessment (EA), as required by the National Environmental Policy Act (NEPA). INDOT is planning a robust public involvement campaign that will include a wide variety of stakeholders, including employers, local/state officials, civic organizations and neighborhoods.

Over the next year and a half, the Project Team will develop the procurement documents that will allow INDOT to select a contractor in 2019. Construction costs and dates will be determined when we have the bids from potential contractors, and construction may not begin until late 2019 at the earliest.

Q: Will there be any right-of way acquisition? (*DMD*)

A: I don't have an answer now. However, our designers are looking to minimize right-of-way needs, and because we're not moving the interstates, we expect it to be minimal.

5. Area of Potential Effects (see attached presentation)

The Area of Potential Effects (APE) is the geographic area within which an undertaking may directly or indirectly change the character or use of historic properties, if any such properties exist. Both direct effects – ground disturbance, right-of-way acquisition, demolition and alteration – and indirect effects – visual and noise – are considered when developing the APE.

The I-65/I-70 North Split Reconstruction Project proposed APE includes:

- ½-mile buffer of North Split interchange
- ¼-mile buffer of proposed work on interstates and local roads
- Accounts for possible 48-foot increase in bridge height (conservative estimate)

National Historic Landmarks in the APE are the Benjamin Harrison Home and James Whitcomb Riley House.

There are 39 NRHP-listed resources in the APE (complete list in attached presentation).

6. Archaeology Update (see attached presentation)

Evidence for archaeological deposits will be attained through two phases. Phase 1a will include shovel testing for previously undisturbed areas (if needed) and Phase 1b will include backhoe trenching.

The Phase 1b work was done in September 2017 in the interchange infield. Areas chosen for backhoe trenching were done to not impact existing infrastructure. Sanborn Fire Insurance maps (ca. 1914) were used to guide trench placement.

10 trenches of various size were excavated. Trenches 1-9 showed evidence of disturbance. A brick-lined cistern was identified in trench 10. The bottles recovered from the cistern indicate a portion was filled circa the 1950s.

Q: Are you looking further south in the impact area?

A: We're looking everywhere in the impact area we can, but there are a lot of areas that have been paved or previously disturbed. We have to work around utilities, for example. We are evaluating any areas that have not been previously disturbed.

7. Next Steps (see attached presentation)

In the coming months, we will complete the Historic Property Report for aboveground resources, analyze traffic pattern data once available from traffic model, evaluate the project area for the need to do Phase 1a archaeological testing, complete Phase 1b archaeological investigation report, and hold the next Consulting Party meeting in two to three months.

8. Consulting Party Feedback

Comments are due by October 20, 2017. The Project Team is looking for feedback on any additional consulting parties, the meeting location (needs conference phone, internet, U-shaped tables), the proposed APE, and any other concerns consulting parties may have at this time.

9. Questions and Answers

Q: The Cottage Home neighborhood backs up to the interstate. If the road is widened, is this going to impact the railroad in that area? (*Cottage Home NA*)

A: Right now, the design intention is not to impact the railroad at all. In fact, it's very challenging to do so and we would like to stay away from it. We do cross a little south of where the railroad goes under the interstate, so we will have impacts to the area during construction while we work on the areas over it, but we have no intention of permanently impacting the railroad.

Q: Does this map reflect the current right of way? (*IHPC*)

A: For the most part it does show existing right-of-way but there are some areas where it extends outside of it. We've asked designers to give us the worst-case footprint and that is what they provided. We wanted to make sure our APE was as big as needed.

Q: Many urban cities are doing away with interstates. Have there been any thoughts of burying the interstate instead? We all know that CSX is untouchable and will never stop going through our neighborhood, so if we could somehow bury Michigan and New York it would keep traffic moving for us, make the highway not as high, and not block our views of downtown. (*Holy Cross NA*)

A: The current scope does not include any lowering or burying of the interstate. I would encourage you to write this down into your comments, though. In terms of the 48-foot high bridges, I want to stress that we were being conservative with that. We just drew a buffer around the interchange and said the entire area will be raised 48 feet. In reality, that's not the case. If it is raised that high, it may only be one bridge while the rest are lower.

- Q: I've done a lot of work in Texas, and they don't have the ice we do here. Is it smart to be doing flyovers and are you taking into account the maintenance of that in general? (*Holy Cross NA*)
- A: We are trying to provide the best design we can in the current footprint. We could design flat, but then our footprint gets even wider and the impacts are greater.
- Q: I see this as a real opportunity to make aesthetic improvements. There is no reason the bridges can't enhance the neighborhoods. How do you incorporate aesthetic considerations as an opportunity to elevate the city through the bridge? I think often the bridges are a mental barrier for people because they look dark and scary. Is there a possibility to add lighting? (*Benjamin Harrison Presidential Site*)
- A: I think this is something that INDOT can consider in the minimization and mitigation measures. INDOT will have to determine what we are mitigating for, and that's an ongoing process as we move along, but hearing your thoughts and concerns at this stage in the process is very helpful.
- Q: Will the current parking under some bridges remain? (*Charles Hyde, Benjamin Harrison Presidential Site*)
- A: We don't anticipate impacts to parking under the mainline interstate; however, there could be impacts to parking under the exit/entrance ramps [note, this was clarified after the meeting].
- Q: Should the neighborhoods be reaching out to the historic properties to make sure they are aware of this project, or will INDOT? (*Cottage Home NA*)
- A: Oftentimes, we invite the owners to be a part of the process, but since there are so many we thought we would wait and see what type of effects the project may have. You're welcome to mention it and if they are interested in being part of Section 106, we're happy to add them. One of the reasons we invited representatives from the neighborhoods first was to keep the size of the group smaller. We weren't sure if we'd be able to have an effective consulting parties meeting if we invited everyone. That would be great for a public meeting. We're also willing to come out to neighborhood meetings in the future.
- Q: How would we go about setting that up? (*Cottage Home NA*)
- A: Go ahead and contact me, Kia.
- Q: Will we have an opportunity to comment on the APE after we've seen the noise study or other impacts? (*IHPC*)

- A: The APE could evolve over time as more design information becomes available. I wouldn't say the APE is static. If something happens in design that changes things, we understand that the APE may also need to be adjusted. I don't know that we're going to ask for comment on it each time, but if you see something stand out as we provide additional information and alternatives, please let us know.
- Q: When do you anticipate sharing the design with consulting parties? *(DMD)*
- A: We hope to be able to share some preliminary design information at either the next meeting or the one after.
- Q: I would like to request that we can more formally comment on the APE once we've had a chance to look at the designs. *(IHPC)*
- A: Ok, we will include a formal request for comments on the APE.
- Q: Have you done studies on properties that are eligible for the Historic List? *(DMD)*
- A: We are doing a study but it is not yet completed.
- Q: We are seen as the crossroads of America. Semi traffic is really high and our neighbors at Windsor Park have issues too. We lose traffic signs, mirrors on cars, etc. The streets aren't wide enough for parking and two-way traffic. What is the plan for detouring that kind of commercial traffic around? *(Holy Cross NA)*
- A: We don't have maintenance of traffic figured out yet. However, we will encourage through trucks to go on I-465. Some trucks will have to detour downtown for deliveries. We will be looking at maintenance of traffic in the next few months to come up with solutions that keep trucks out of the neighborhoods they shouldn't be in.
- Q: The access roads on Pine and Davidson, and the connecting roads of Meridian and Pennsylvania, are those INDOT jurisdiction and will they be touched as part of this project? Now is the ideal time to rebuild those. *(Holy Cross NA)*
- A: We don't know the total impacts at this time, so I can't tell you for sure yes or no. In terms of jurisdiction, the city owns the streets as far as I understand. We've completed our field study and part of the other work is to determine existing property lines. We are still working on that this week, so I can't tell you an answer. Currently, there is no plan to reconstruct Pine and Davidson. There will be some impacts along 11th and 12th streets that border I-65. Ramps there have conditional and operational issues so there will be changes in that area. The plan is to squeeze the project into property that INDOT owns if possible.
- Q: Do you anticipate having the same entrance and exit points, or are you going to expand/limit any points of accessibility? *(Benjamin Harrison Presidential Site)*

- A: Yes, where we have entrances, exits and access points today will remain. We're not taking away or adding new access. However, the existing may be slightly tweaked.
- Q: Going back to the APE, the left side splits around I-65 and extends to Meridian. The ramp there currently stops at Pennsylvania. Can you help me understand this? (*IHPC*)
- A: There are utilities in that area that might be moved, traffic signal work or even turn lane work. We are not anticipating work on the highway in the area, but could have work on the local roads and signals.
- Q: Are you considering rapid transit on Meridian? (*DMD*)
- A: Yes.
- Q: The MPO did a freight study and determined on I-70 that dedicated truck lanes were the most effective use of interstate. It would mean a dedicated truck lane along I-70. HNTB did the analysis I believe. Is this being considered? (*DMD*)
- A: We will look into this.
- Q: What questions should we be asking? (*Benjamin Harrison Presidential Site*)
- A: We don't want to put words in your mouth. If there is something you feel strongly about, we want you to voice it.
- Q: Are there any state requirements for greenspace or art? (*Holy Cross NA*)
- A: We are not aware of any requirements in Indiana.
- Q: What about the paving surface? We already know the roads are paved so high that trucks hit the bridges. Will you use something that doesn't have to be redone so often? (*Holy Cross NA*)
- A: One of the things we're considering is pavement that lasts longer. Reinforced concrete pavement is used to the south and it extends the life. It costs more to construct, but lasts longer. INDOT is considering the value, including not having to come out as often for repairs, when examining options.
- Q: Is it true that FHWA interstates are exempt from being listed on the register? Are there certain roadways that are exempt from being national register eligible? (*Chris Myers, IHPC*)
- A: Interstates do have that exception, but not all federally-funded roads do.
- Q: Hearing that the bridges are huge barriers in highly dense areas, how do we mitigate the impact of this, the bridges not the barriers? Whether it's park space, beautification – what does this look like to make it more of an amenity than a barrier? (*DMD*)

- A: One of the unique features planned that the City and INDOT agreed to years ago is to eliminate traffic on Vermont under the bridge so it can be a pedestrian area. That's currently planned as one of the connection opportunities.
- Q: Are sound barriers being considered? (*IDNR DHPA*)
- A: We are doing a noise study to see if they are feasible and reasonable. Part of the INDOT and FHWA policy is to allow property owners of benefitted receptors to have input as to whether they would like them or not. There are two sides to noise barriers, they will block the noise but they will also block the view.
- Q: Where in your considerations do beautification of the space (sound barriers included) fall? What consideration is given to the people driving through our city? (*Benjamin Harrison Presidential Site*)
- A: We are looking at all of that. We haven't made determinations at this point, but in terms of community impacts, there are people who live and drive through so we'll be looking at both.

10. Adjourn

I-65/I-70 North Split Interchange Reconstruction Project

Section 106 Consulting Parties Meeting

October 6, 2017

Agenda



- Welcome/Introductions
- Purpose of Meeting
- Section 106 Consultation Process
- Project Overview
- Area of Potential Effects (APE)
- Archaeology Update
- Next Steps
- Consulting Party Feedback
- Questions

Section 106 Consultation Process

What is Section 106?

- Part of National Historic Preservation Act (NHPA) (1966)
- Considers effects of actions on properties listed in or eligible for National Register of Historic Places (NRHP)
- Gives Advisory Council on Historic Preservation (ACHP) opportunity to consult



3

Section 106 Consultation Process

Section 110(f) of the NHPA

- Minimizes harm to National Historic Landmarks
- Considers all prudent and feasible alternatives to avoid an adverse effect
- Gives ACHP opportunity to consult



§ 306107. Planning and actions to minimize harm to National Historic Landmarks

Prior to the approval of any Federal undertaking that may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall to the maximum extent possible undertake such planning and actions as may be necessary to minimize harm to the landmark. The head of the Federal agency shall afford the Council a reasonable opportunity to comment with regard to the undertaking.

4

Section 106 Consultation Process



Consulting party: Individuals and organizations with demonstrated legal, economic, or historic preservation interest in an undertaking

Roles of consulting party

- Review information about the project
- Provide input at different steps of the process
- Share views, offer ideas and solutions
- Consider possible ways to avoid, minimize, and/or mitigate effects on historic properties

Section 106 Steps for North Split Project

1. Initiate Consultation

- ~~Early Coordination/APE Letter (Sept. 19, 2017)~~
- Consulting Parties Meeting (Oct. 6, 2017)



We are here

2. Identify Historic Properties

- Historic Property Report/Consulting Parties Meeting (winter 2017/2018)
- Historic Property Report Additional Information for Traffic/Consulting Parties Meeting (spring 2018)

3. Assess Effects of Undertaking on Historic Properties

- Effects Report/Consulting Parties Meeting (summer 2018)
- 800.11(e) Document/Finding/Mitigation/Consulting Parties Meeting (fall 2018)

4. Resolve any Adverse Effects

- Draft Memorandum of Agreement (MOA) for Review (winter 2018)
- Final MOA for Signatures (spring 2019)

Project Overview

I-65/I-70 North Split Interchange Reconstruction Project

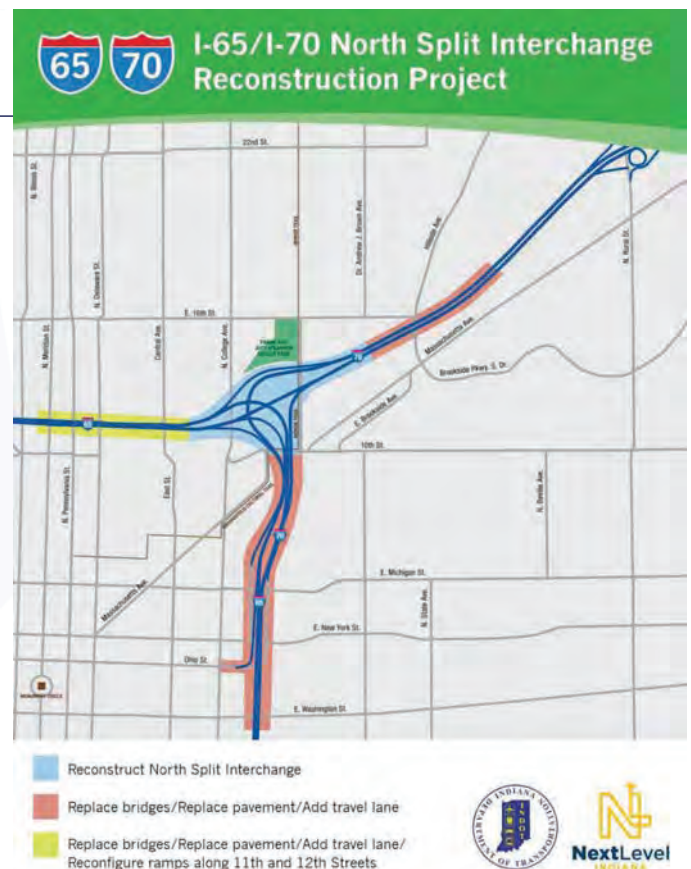


- Reconstruct the North Split Interchange
- Rehabilitate, replace and/or widen 32 bridges
- Reconstruct pavement
- Reconfigure I-65 exit/entrance ramps along 11th and 12th streets
- Additional through lanes on I-65 and I-70

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Project Limits

- One mile of I-65/I-70, from the North Split to the Washington Street interchange (northern and southern limits)
- Along I-65 from Meridian Street to the North Split (western limit)
- On I-70 from the North Split to just west of the Keystone/Rural interchange (eastern limit)



8

Need for Project



North Split Interchange

- One of the most heavily traveled interchanges in the state
- Accommodates 170,000 vehicles per day
- Operating at full capacity
- Portions constructed almost 50 years ago

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Need for Project

- Many of the existing **32 bridges** need rehabilitation or replacement due to structural conditions
- Deteriorating **pavement conditions** require constant repair and patching for roadway and shoulders
- Current I-65/I-70 North Split interchange has many **complex lane change configurations**
- Reconstructed interchange will minimize the number of lane changes drivers must maneuver to get to their destination

10

Environmental Assessment



Environmental Assessment (EA) will study:

- **Impacts** on homes, businesses and the natural environment
- **Cultural resources** – Historic sites and districts (Section 106)
- **Environmental justice** – Minority and low-income populations
 - Additional public outreach conducted in low-income and minority communities

11

Environmental Assessment

- Projected changes of noise levels and their effects on local neighborhoods
- How to maintain connectivity to local roads, trails, and pedestrian and bicycle facilities
- Input from state, local and federal resource and permitting agencies, e.g. IDNR, IDEM, et al.



12

Traffic Maintenance and Impacts



Factors to consider:

- Travel demands of regional commuters and through traffic
- State and local construction project schedules
- Safety of motorists and workers during construction

Possible impacts:

- Temporary closure
- Re-routed traffic
- Cross streets

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Finances / Delivery

- Part of Indiana's Next Level Roads initiative
- Project fully funded
- Design-Build Best Value design procurement
 - Accelerates project schedule by allowing successful contractor team to finalize design plans and construct simultaneously
 - Encourages contractors to propose value-added construction solutions that may accelerate construction and reduce costs and impacts



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Project Schedule – Next Steps

2018

- **Early 2018** – First public open houses held
- **Mid-2018**
 - Preliminary design completed
 - Draft project information published for contractor team review
- **Late 2018** – Final project information advertised

2019

- Public hearing held
- EA completed
- Final contractor proposals submitted
- INDOT selects winning contractor team
- **Late 2019** – Earliest construction begins

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Public Involvement

Robust public involvement plan includes numerous stakeholders, including employers, local/state officials and neighborhoods

- Project website, social media, texts and e-newsletters
- Media relations
- Public meetings
- Advisory committees
- Presentations to local groups



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Area of Potential Effects

- Geographic area within which an undertaking may directly or indirectly change the character or use of historic properties, if any such properties exist
- APE is influenced by scale and nature of undertaking
- Can be different for different kinds of effects caused by undertaking



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Potential Effects

Direct effects

- Ground disturbance
- Right-of-way acquisition
- Demolition
- Alteration

Indirect effects

- Visual
- Noise

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Proposed Area of Potential Effects

- ½-mile buffer of North Split Interchange
- ¼-mile buffer of proposed work on Interstates and local roads
- Possible 48-foot increase in bridge height (conservative estimate)
- Reviewed I-74/I-465 interchange (east side) in the field
- Reviewed North Split interchange in the field
 - Intelligent Transportation Systems tower is about 15 feet higher than the top of a 13.5-foot-tall truck on tallest proposed bridge (used as a visual guide)
 - Due to development density, interchange would not be or only minimally visible at ½ mile
- Qualified professional drove APE to make sure it's appropriate
- Does NOT include traffic pattern changes

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Known Historic Resources in APE

National Historic Landmarks:

Nationally significant historic places designated by the Secretary of the Interior because of exceptional value or quality in illustrating or interpreting U.S. heritage

- Benjamin Harrison Home
- James Whitcomb Riley House



Known Historic Resources in APE

National Register of Historic Places (NRHP): Official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture



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Known Historic Resources in APE

NRHP-Listed Resources

1. Old Northside H.D.
2. St. Joseph Neighborhood H.D.
3. Chatham Arch H.D.
4. Massachusetts Ave. H.D.
5. Herron-Morton Place H.D.
6. Lockerbie Square H.D.
7. Cottage Home H.D.
8. Arsenal Tech High School
9. Fletcher Place H.D.
10. Indianapolis Parks and Blvds. System
11. Central Library of Indianapolis
12. Prosser House
13. Bals-Wocher House
14. Pierson-Griffiths House
15. Cole Motor Car Company
16. The Ambassador
17. The Harriet
18. The Burton
19. The Cathcart Apartments
20. Delaware Court

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Known Historic Resources in APE

NRHP-Listed Resources

- | | |
|------------------------------|--|
| 21. Lodge Apartments | 31. Pearson Terrace |
| 22. The Shelton | 32. The Vera and The Olga |
| 23. The Myrtle Fern | 33. William Buschman Block |
| 24. Pennsylvania Apartments | 34. Sheffield Inn |
| 25. Plaza Apartments | 35. Manchester Apartments |
| 26. The Spink | 36. Morris-Butler House |
| 27. Wyndham | 37. The Propylaeum |
| 28. The Chadwick | 38. Gaseteria, Inc. |
| 29. Independent Turnverein | 39. Indianapolis Public Library Branch |
| 30. Calvin I. Fletcher House | |

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Archaeology

Evidence for archaeological deposits will be attained through two phases

- Phase 1a
 - Shovel testing for previously undisturbed areas (if needed)
- Phase 1b
 - Backhoe trenching



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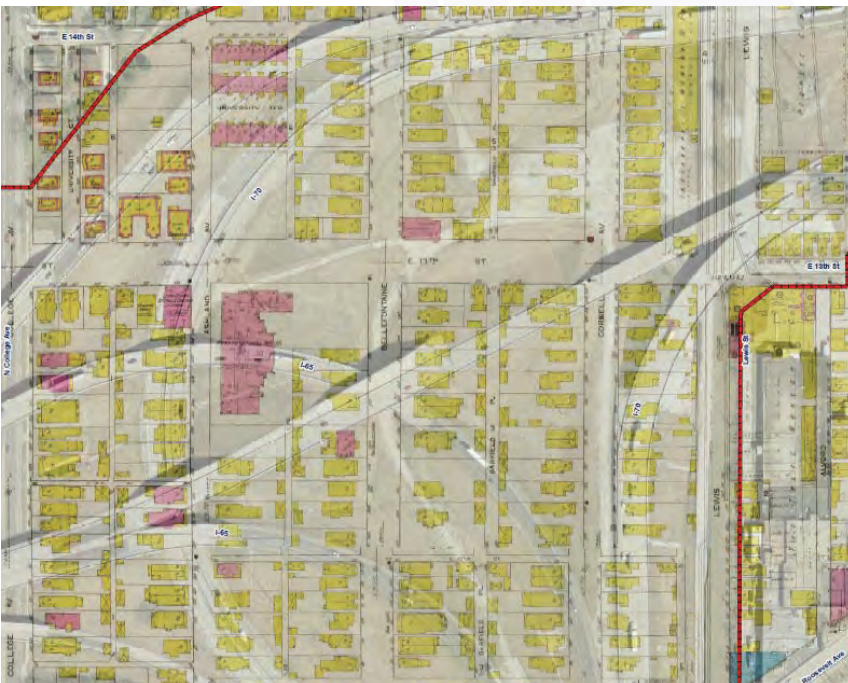
Archaeology Phase 1b Investigation



- Phase 1b work done in September 2017 in interchange infield
- Areas chosen for backhoe trenching would not impact existing infrastructure

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Archaeology Phase 1b Investigation



- Sanborn Fire Insurance Maps (ca. 1914) were used to guide trench placement

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Archaeology Phase 1b Investigation



- 10 trenches of various sizes were excavated

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Archaeology Phase 1b Investigation



- Trenches 1 thru 9 showed evidence of disturbance
- Much effort was taken to remove buildings in portion infield before interchange construction

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Archaeology Phase 1b Investigation



- Brick-lined cistern identified in Trench 10
- The bottles recovered from cistern indicate portion was filled in mid-1900s

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Section 106 Next Steps

- Complete Historic Property Report for aboveground resources
- Analyze traffic pattern data once available from traffic model
- Evaluate project area for need for Phase 1a archaeological shovel testing investigation
- Complete Phase 1b archaeological investigation report
- Next Consulting Party Meeting in 2-3 months

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Consulting Party Feedback

- Please provide comments by **Oct. 20, 2017**
- Please provide feedback about:
 - Other consulting parties?
 - Meeting location
(speaker phone, wifi, U-shaped tables)
 - Area of Potential Effects
 - Other?



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Questions/Comments

Project Contact

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CONSULTING PARTIES MEETING NO. 2, JANUARY 26, 2018



NORTH SPLIT SECTION 106 CONSULTING PARTIES MEETING AGENDA
JANUARY 26, 2018
BENJAMIN HARRISON PRESIDENTIAL SITE/WEBEX – 9:00 A.M. TO 11:00 A.M.

- I. Welcome & Introductions (FHWA & INDOT – 10 minutes)
- II. Purpose of Meeting (HNTB – 5 minutes)
 - a. Meeting Ground Rules
- III. Section 106 Consultation Process (HNTB – 5 minutes)
 - a. What is Section 106?
 - b. Role of Consulting Party
 - c. Section 106 Steps for North Split Project
- IV. Project Overview (HNTB – 10 minutes)
 - a. Project Needs
 - b. Alternatives Development Process
 - c. Project Intent Report
- V. Original Area of Potential Effects (APE) (HNTB – 10 minutes)
- VI. Historic Properties (ASC Group – 15 minutes)
 - a. What is a historic property?
 - b. Listed in the National Register of Historic Places
 - c. Recommended eligible for the National Register of Historic Places
 - d. Listed in the Indiana Register of Historic Sites and Structures
- VII. State Certificate of Approval Dual Review Process (ASC Group – 5 minutes)
- VIII. Archaeology Update (ASC Group – 5 minutes)
- IX. Traffic Diversion & APE Expansion Methodology (HNTB – 10 minutes)
- X. Consulting Party Comments & Responses (HNTB – 10 minutes)
- XI. Next Steps (HNTB – 5 minutes)
- XII. Questions? (25 minutes)



MEETING SUMMARY

Date: January 26, 2018
Time: 9:00-11:00 a.m.
Meeting: I-65/I-70 North Split Project Section 106 Consulting Parties Meeting #2
Location: Benjamin Harrison Presidential Site, Indianapolis, IN (also via WebEx)

Attendees:

Name	Agency/Organization	Email
Runfa Shi	INDOT	rshi@indot.in.gov
Andy Dietrick	INDOT	adietrick@indot.in.gov
Kia Gillette	HNTB	kgillette@hntb.com
Seth Schickel	HNTB	sschickel@hntb.com
Susan Harrington	HNTB	sharrington@hntb.com
Emily Kibling	Borshoff	Emily.kibling@borshoff.biz
Michelle Allen	FHWA	Michelle.allen@dot.gov
Patrick Carpenter	INDOT	Pacarpenter@indot.in.gov
David Cleveland	Corradino Group	dcleveland@corradino.com
Isaac Bamgbose	Hendricks Commercial Properties	Isaac.bamgbose@hendricksgroup.net
Hillary Barnes	Old Northside Neighborhood Rep	travis@hoteltangowhiskey.com
Lindsay Crespo	John Boner Neighborhood Center	lcrespo@jbncenters.org
Sean Coughlin	ASC Group	scoughlin@ascgroup.net
Marsh Davis	Indiana Landmarks	mdavis@indianalandmarks.org
Pat Dubach	Holy Cross Neighborhood Rep	pdubach@redev.net
David Forsell	Keep Indianapolis Beautiful	dforsell@kibi.org
Pete Haupers	St. Joseph Neighborhood Rep	Haupers3@gmail.com
Laura Hilden	INDOT	lhilden@indot.in.gov
Lynn Molson	Old Northside Neighborhood Rep	nsinui@ameritech.net
Jim Jessee	Cottage Home Neighborhood Rep	Jamesjessee102@gmail.com
Marjorie Kienle	HUNI	mlkienle@indy.rr.com
Leah Konicki	ASC Group	lkonicki@ascgroup.net
Anuradha Kumar	INDOT	akumar@indot.in.gov
Jeffrey Laswell	INDOT	jlaswell@indot.in.gov
Chad Lethig	HUNI/Indiana Landmarks	clethig@indianalandmarks.org

Name	Agency/Organization	Email
Chris Myers	IHPC	Chris.myers@indy.in.gov
Meredith Klekotka	Indy DMD	Meredith.klekotka@indy.gov
Harry Nikides	ASC Group	hnikides@ascgroup.net
Patti Perrin	Property Owner	pperrin@indy.rr.com
David Pflugh	Chatham Arch Neighborhood Rep	cahaindy@gmail.com
Anthony Ross	INDOT	Aross3@indot.in.gov
Jason Rowley	Holy Cross Neighborhood Rep	jrowley@hanson.inc.com
Jordan Ryan	North Square Neighborhood Rep	jordanblairryan@gmail.com
Charles Hyde	Benjamin Harrison Presidential Site	chide@bhpsite.org
Chad Slider	IDNR-DHPA	cslider@dnr.in.gov
Mitchell Zoll	IDNR-DHPA	mzoll@dnr.in.gov
Mark Zwoyer	Indianapolis DPW	Mark.zwoyer@indy.gov
Charlotte Arkuah	Resident	Not provided
Clayton Cavell	Resident	clayton@cavellandcavell.org
Robert Newport	McGowan Hall	director@mcgowanhall.org
Dan Mullendore	Old Northside BOD	Bookem4096@gmail.com
Rod and Ann Taylor	Old Northside residents	Annelise520@gmail.com
Kevin Osburn	Old Northside resident	kosburn@reasite.com
Robert Kennedy	Old Northside resident	bob@thefinaldomain.com
Chris Mann	IHPC	Not provided
Stephanie Belch	Indianapolis MPO	Stephanie.belch@indympo.org
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Ben Marks	Marks Co.	bmarks@markscompanies.com
Joseph Jarzen	Keep Indianapolis Beautiful	jjarzen@kibi.org
Paul Ayers	Property owner	payers@markscompanies.com
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Meg Storrow	Downtown resident	storrow@storrowkinsella.com
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Seth Patton	316 N. College Avenue	seth@luxcityrealty.com
Chuck Williams	1548 Broadway Street	Cwradio1@gmail.com
Mary Williams	1548 Broadway Street	mwsurbie@gmail.com
Tim Faluey	Old Northside resident	twfaluey@gmail.com
Amy Bartner	Indy Star	Amy.bartner@indystar.com
Eryn Fletcher (via phone)	FHWA	Eryn.fletcher@dot.gov
Diane Hunter (via phone)	Miami Tribe of Oklahoma	dhunter@miamination.com

1. Welcome

The Federal Highway Administration (FHWA) opened the meeting by thanking consulting party representatives for their participation, as well as members of the public who joined the meeting. FHWA explained that because federal funds are being used for the project, it must follow the Section 106 consultation process.

2. Introductions

Project Team – The representatives of the Project Team and the Indiana Department of Transportation (INDOT) introduced themselves (see attached attendee list).

Guests – Consulting parties and members of the public introduced themselves. More than 30 consulting party representatives were present, while two were on the phone (see attached attendee list).

Public – Roughly 20 members of the public were present (see attached attendee list, some signed in and some did not).

3. Purpose of Meeting

The purpose of this meeting was to provide a Section 106 consulting party update.

Meeting ground rules outlined are as follows:

- Consulting parties encouraged to participate
- Not intended to be a public information meeting
- If space allows, members of the public may observe but not participate
- Save questions until the end
- Be respectful of other consulting parties
- Submit written questions/comments

4. Section 106 Consultation Process (see attached)

Section 106 is part of the National Historic Preservation Act (NHPA) of 1966 and requires the consideration of the effects of federal actions on properties listed in or eligible for National Register of Historic Places (National Register). Section 106 gives the Advisory Council on Historic Preservation (ACHP) the opportunity to participate in consultation with the federal agency, project sponsor, and consulting parties regarding impacts to historic properties. Section 110 requires federal agencies to minimize harm to National Historic Landmarks, consider all prudent and feasible alternatives to avoid an adverse effect to them, and also gives the ACHP an opportunity to consult.

A consulting party is an individual or organization with demonstrated legal, economic or historic preservation interest in an undertaking. As part of the Section 106 process, consulting parties are invited to consult on the project. The consulting party reviews information about the project, provides input at different steps of the process, shares views, offers ideas and solutions, and considers possible ways to avoid, minimize and/or mitigate effects on historic properties.

The Section 106 timeline for the I-65/I-70 North Split Project is as follows:

- Initiate consultation
 - Early Coordination/APR Letter (Sept. 19, 2017)
 - Consulting Parties Meeting #1 (Oct. 6, 2017)
- Identify historic properties
 - Historic Property Report/Consulting Parties Meeting #2 (Winter 2018 – we are here)
 - Historic Property Report Additional Information for Traffic/Consulting Parties Meeting #3
- Assess effects of undertaking on historic properties
 - Effects Report/Consulting Parties Meeting #4
 - 800.11(e) Document/Finding/Mitigation/Consulting Parties Meeting #5
- Resolve any adverse effects
 - Draft Memorandum of Agreement (MOA) for Review
 - Final MOA for Signatures

5. Project Overview (see attached)

The I-65/I-70 North Split interchange is one of the most heavily-traveled interchanges in the state, accommodating more than 170,000 vehicles per day. It is operating beyond full traffic capacity and was constructed between 40 and 50 years ago. All of the existing 32 bridges need rehabilitation or replacement due to structural conditions and deteriorating pavement conditions which require constant repair and patching for roadway and shoulders. In addition, the current I-65/I-70 North Split interchange has many complex lane configurations. The reconstructed interchange will minimize the number of lane changes drivers must maneuver to get to their destination.

A general diagram shows the environmental review process broken down into seven stages – planning studies, identify purpose and need, develop alternatives, screen alternatives, reasonable alternatives, publication of the preferred alternative in an environmental assessment (EA), and, if appropriate, a finding by FHWA accepting the preferred alternative (called a FONSI, for finding of no significant impact). The project team is currently refining the purpose and need and developing alternatives.

The Project Intent Report was completed by the INDOT Corridor Development Office in July 2016. This preliminary document evaluates traffic operations and is used to identify project needs, develop possible traffic solutions and establish a preliminary project budget. It does not contain design plans and does not present a preferred alternative.

The I-65/I-70 North Split Project includes a robust public involvement plan with numerous stakeholders, including employers, local/state officials and neighborhoods. Anticipated public involvement activities include a project website, social media, text notifications, e-newsletters, media relations, public meetings, advisory committees and presentations to local groups.

6. Original Area of Potential Effects (see attached presentation)

The Area of Potential Effects (APE) is the geographic area within which an undertaking may directly or indirectly change the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of the undertaking, and can be different for different kinds of effects caused by the undertaking.

It is important to note that alternatives are still under development and therefore the APE could change.

The I-65/I-70 North Split Project original APE includes:

- ½-mile buffer of North Split interchange
- ¼-mile buffer of proposed work on interstates and local roads
- Possible 48-foot increase in bridge height (worst-case scenario)

The project team reviewed the I-74/I-465 interchange (east side of Indianapolis) in the field as well as the North Split interchange in the field. The current communications tower in the North Split interchange is about 15 feet higher than the top of a 13.5-foot-tall truck on the tallest proposed bridge (used as a visual guide). Due to development density, it was also determined that the Interchange would be minimally visible at 0.5 mile if visible at all. A Qualified Professional Historian (QP) drove the APE to make sure it was appropriate. This review did not include temporary traffic pattern changes.

A comment was received on the original APE which was, “Given the density of the corridor (residential and commercial) we should increase the area of impact around the entire project to 0.5 mile not 0.25 mile as was proposed.” The project team (including a Qualified Professional Historian) took a second look at the APE which included taking photos at 0.25-mile APE line. It was determined that the 0.25-mile APE line is still appropriate with current assumptions. The project team reviewed this with the State Historic Preservation Officer (SHPO), who agreed this APE is likely appropriate under current assumptions.

It is important to note that if design changes occur and assumptions are no longer accurate, the APE will be re-examined.

7. Historic Properties (see attached presentation)

The National Register of Historic Places (National Register) is an official federal list of districts, sites, buildings, structures and objects significant in American history, architecture, archaeology, engineering and culture.

A historic property is one that is listed individually on or eligible for listing on the National Register, or a property listed in or eligible for the National Register as part of a historic district. To be listed on the National Register, properties must meet certain criteria:

- Typically, 50 years old or older
- Associated with significant events in history
- Associated with the lives of people significant to the past
- Embodies distinctive architectural characteristics or construction techniques

- Must retain sufficient integrity (ability to convey its significance)
- May yield important information

There are 10 National Register-listed districts in the APE. There are 27 National Register-listed properties in the APE (complete list in attached presentation).

National Historic Landmarks in the APE are the Benjamin Harrison Home and James Whitcomb Riley House.

There are three historic districts recommended eligible for the National Register, seven properties recommended individually eligible for the National Register and two properties listed only in the Indiana Register of Historic Sites and Structures in the APE (complete list in attached presentation). In addition, the Martin Luther King, Jr. Park and Marion County Bridge No. 252L were previously determined eligible.

8. State Certificate of Approval Dual Review Process (see attached presentation)

A Certificate of Approval (COA) from the Indiana Historic Preservation Review Board is required before using state funds to alter, demolish or remove a historic site or structure owned by the state or listed in the State or National Registers. It is not currently known whether a COA will be required for the I-65/I-70 North Split Project.

Dual language alerts Division of Historic Preservation & Archaeology to review project information under both Section 106 and the state law concurrently.

9. Archaeology Update (see attached presentation)

Phase 1b survey work was completed in September 2017 by backhoe trenching in the interchange infield. The report is being revised per INDOT comments and once approved will be sent to SHPO and Tribes.

10. Traffic Diversion & APE Expansion Methodology (see attached presentation)

The project team is proposing the APE be expanded based on anticipated temporary truck traffic increases on city streets during construction. This project has unique circumstances including its downtown Indianapolis location, the density of historic properties within the original APE, and the potential duration for construction. INDOT and FHWA do not intend to expand the APE for potential traffic diversion during construction for all projects in the future.

Effects are the alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register. This project may have temporary impacts to the community beyond the scope of Section 106 consultation process. INDOT and FHWA will work to minimize these impacts while the focus for Section 106 is on historic properties.

An adverse effect is when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association.

One example of adverse effect per 36 CFR 800.5 (a) (2) is the physical destruction of or damage to all or part of the property (A longer list of examples can be found in the attached presentation). The project team recognizes that there will be increases in heavy truck traffic diverted during construction – those making local deliveries in or near downtown. In addition, there may be physical impacts to contributing features within historic districts/properties such as brick/stone streets, limestone curbs and stone walls and impacts of heavy trucks on historic bridges. The APE expansion is not based on passenger vehicle traffic – most city streets are designed to accommodate passenger vehicle traffic.

The APE expansion methodology is a two-tiered approach. Tier 1 includes surveying the existing right-of-way for historic or unique features such as brick or stone streets, limestone curbs, stone walls or other potentially contributing feature, as well as historic bridges. Tier 2 will occur if historic or unique features are identified. During this time, the QP will determine if these features are contributing to a National Register-listed or National Register-eligible historic district or property. Typically, these features are not individually National Register-listed or National Register-eligible unless they contribute to a National Register-listed or National Register-eligible historic district or property.

11. Consulting Party Comments & Responses

Comments received during the initial consulting parties comment period pertained generally to the APE, aesthetics and visual impacts, noise, lighting, pedestrian/bicycle connectivity and traffic during construction.

A comment was received on the previously-conducted I-70 Dedicated Truck Lanes (DTLs) Feasibility Study. This high-level planning study was prepared for Missouri, Illinois, Indiana and Ohio DOTs and was completed in 2011. At this time, INDOT is not pursuing DTLs.

12. Next Steps

In the coming months, the project team will complete the Phase 1b archaeological investigation report. The next consulting parties meeting is expected to be held in the next three-to-four months to discuss alternatives.

13. Consulting Party Feedback

Comments are due by February 9, 2018. The project team is looking for additional feedback on historic properties, traffic diversion and APE expansion methodology, the meeting location, and any other concerns consulting parties may have at this time.

It is important to note that alternatives are under development and will be presented at a later meeting for review and comment.

14. Questions

The Question and Answer portion of the consulting parties meeting was a time for consulting party members and members of the public to ask questions. The Project Team provided responses. Consulting party members and members of the public were also able to make comments for the public record during this time.

Q: What does it mean to create an Area of Potential Effect for roads, in particular as it relates to weight limit on these? Do you need weight limits from us? CSX may have concerns about bridges. *(Indianapolis Department of Metropolitan Development (DMD))*

A: CSX has been contacted regarding bridges, but we do not have a response from them yet. Weight limits have not been examined. If there are reasons that trucks don't use these streets now, we will work with law enforcement to make sure they don't use them during construction. If you have weight limits you can share, that would be great. *(Project Team)*

Q: Our organization's members line the route and we're concerned about the impact on historic properties. Six of our member neighborhoods are definitely on the National Register. Some of us have lived there more than 40 years, and we've seen the impact of the interstate from when it was built to today. Our concerns aren't just traffic-related but livability-related. We've taken a position *(handed forward position statement)* and would like to know why, when you know these areas are on the National Register, would you not include a Section 4f? What makes this a requirement? *(HUNI)*

A: If a Section 4f evaluation is required, we will complete one. Much of the work currently being done is procedural, whereas Section 4f evaluation is different. A Section 4f evaluation is a federal requirement for the Department of Transportation and has to do with adverse effect and use of property – often because of property acquisition. Right now, we don't know the effect since we're still exploring alternatives. When we get to that point in the project, we will reexamine the need for a Section 4f evaluation. INDOT is the project sponsor and FHWA is here to make sure INDOT follows regulations and requirements. FHWA has final approval to make sure all federal requirements are met. *(Project Team)*

Q: I am concerned that the idea of looking at impacts seems to be very literally in the right-of-way. Is the APE looking at the non-traffic issues including noise? Will that be considered both during construction and after? *(Indiana Landmarks)*

A: A noise study will be completed for the project. The study will look at operations after construction and determine whether sound barriers are warranted.

Q: Does that study extend beyond INDOT right-of-way? *(Indiana Landmarks)*

A: Yes, the noise study will extend beyond the existing right-of-way. There are specific procedures that take place in a noise study, and we can talk through those further during the next meeting. *(Project Team)*

Q: Are noise and vibration considered in a Section 4f evaluation? *(Consulting Party Member)*

A: A noise study will be completed for the project. There is some guidance provided by the ACHP regarding noise effects in historic areas, and INDOT has its own noise policy. The project team is also considering vibration. We are required to look at what is there now and what the project will do. It's what's existing and what's coming. *(Project Team)*

Q: When it was built, what capacity was planned for? *(Consulting Party Member)*

A: The original interchange layout has not changed since it was built. We are required to design for 20 years in the future, so the design year for the original interchange was about 1996. The interstates in downtown are currently operating above the original design capacity. *(Project Team)*

Q: What is the number you are anticipating traffic will go to? *(Consulting Party Member)*

A: The traffic study is not completed, so there isn't a figure to release yet. We do not have final concepts or designs to know what it will look like at this point, so we cannot predict what the increased capacity will be. We just don't have the traffic numbers yet. *(Project Team)*

Q: When you're developing design alternatives, are any being created that would look to reduce capacity in that area knowing that through traffic has alternative options? *(Consulting Party Member)*

A: We are looking at a design year of 2041. The design has specific requirements to meet with regards to traffic, so to reduce the existing capacity is not something we are looking at specifically. INDOT is just now starting to look at tolling which could impact capacity needs, but we don't know if that's something that will be chosen. *(Project Team)*

Q: Are there interim traffic studies that can be done? It would be helpful if we knew what would happen if the Council would say that 18-wheelers aren't allowed to make deliveries downtown, or at least limit their weights. What would the Council do? What would this look like? *(Public Participant)*

A: We're not sure they can do this, but we can look into it. *(Project Team)*

Q: What is the budget for this project? *(Consulting Party Member)*

A: The approved budget is approximately \$250,000,000 and that's a starting point for construction dollars of the North Split interchange. When we begin talking about expanded areas, there is nothing approved for a higher cost. *(Project Team)*

Q: Is that Federal and State money? *(Consulting Party Member)*

A: Yes. *(Project Team)*

Q: In these historic districts, the tree-lined streets are a big part of that and removal of these trees would impact a lot of our investment, air quality and fresh air. What impacts are you looking at? *(Keep Indianapolis Beautiful (KIB))*

A: Mark Adler from KIB gave us a map with all of the tree and mural data. Since we don't know the alternative at this point, we don't know what the impact will be. INDOT would like to work with KIB as the project progresses. *(Project Team)*

Q: Is there any role for community centers with disseminating information and bringing input back? *(John Boner Neighborhood Center)*

A: Yes. We envision the Community Advisory Committee and Section 106 having different members, and want to provide information to those members to help share information with neighborhoods. *(Project Team)*

Q: I have legitimate concerns around air quality. I understand this isn't on the list of adverse effects, but will there be an opportunity for public involvement around this topic? Section 106 focuses on historic properties, but there are some properties in this area that aren't historic and issues that aren't part of the adverse effect findings – increased particulate matter for example. Will there be documentation on these? *(John Boner Neighborhood Center)*

A: This will be part of NEPA and we will work with the Indiana Department of Environmental Management (IDEM) and the United States Environmental Protection Agency (USEPA). If you make a comment whether in this Section 106 process or not, we will still consider it for the project. The comment as a whole will be taken into account. *(Project Team)*

Q: Does INDOT have a long-term strategic plan to address the I-65 corridor and I-465 in terms of handling through traffic? To me, that seems like a bigger issue than the bridges. It would seem like you could divert a lot of the traffic coming downtown if the I-465 system was enhanced. *(Consulting Party Member)*

A: INDOT is almost always looking at plans for their roads and interstates. For instance, the type of early analysis that happened in 2016 came from someone whose job is to look at these issues. If we have to look at something outside of the North Split area, we would have to analyze that. *(Project Team)*

Q: In the preliminary planning, was there any consideration given to reduction including removal of the interstate? *(Indiana Landmarks)*

A: I don't believe it was considered in 2016, but we are taking a look at that and replacing with a boulevard now. *(Project Team)*

Q: When we're sitting on our patios, we hear constant noise from the interstate. Do they also consider when 18-wheelers downshift in the noise study? *(HUNI)*

A: I believe it's just noise overall, but we will talk with the noise team and let you know. *(Project Team)*

Q: In addition to noise from the interstate, CSX runs through the Cottage Home neighborhood. With the talk about an increase in train frequency, are your noise studies going to take into account what happens when you build a big concrete wall – and put a noise barrier on top of it – and the noise just bounces further back into the neighborhood? *(Cottage Home Neighborhood)*

A: We will include a noise modeling discussion to our next meeting. *(Project Team)*

Q: What's the current timeline of the project? Can there be a split between repairs that are needed and a full-on solution? *(Hendricks Commercial Properties)*

A: Repairs are currently underway. There are some very urgent needs that we are addressing this year. As you've seen in the news, chunks of interstate bridges are falling down. We are doing some of the more urgent work now to get a few years of service until we get to construction. There are also other operational issues that come into the purpose and need which would require the full reconstruction, such as correcting the weaving patterns. In terms of schedule, we are currently working on the Environmental Assessment and taking a step up to add and address new alternatives. Following alternative analysis, we will do preliminary design (about 30 percent). This is a design-build project, so final design will happen in conjunction with construction in the future. To be clear, we are not performing final design now – we are developing alternatives. *(Project Team)*

Q: I have concerns over the transparency of this project. You are asking consulting parties to comment, but holding meetings at 9 a.m. when people work. You need to make these meetings more available for people. This setup is not suitable for proper viewing. Why are you asking for comments when there are no drawings to look at? *(Public Participant)*

A: We are happy to meet at other times or locations, and are going to have a number of meetings for the public to comment. This meeting is specifically for the identification of historic properties which is a step in the Section 106 process. Alternatives are not yet available for review. *(Project Team)*

Q: Will any alternatives being looked at change the APE? *(Consulting Party Member)*

A: Possibly. The APE will be re-examined if the original assumptions change. *(Project Team)*

Q: What other alternatives are you looking at? *(Consulting Party Member)*

A: A boulevard, tunnel and others. We hope to be able to tell you more about these at the next meeting. The only thing INDOT has put out to date in terms of drawings was the Project Intent Report, which is a planning-level study to determine range of costs for budget purposes, not to act as a design or a preferred alternative. *(Project Team)*

Q: I'd like to hear an explanation of the design-build process. As I understand this, the main reason for doing a design-build is to do things more quickly and cheaply. By its nature, the process disincentivizes creativity and extra expense, which a more comprehensive look would require. I have concern that this project is the opposite of the project you would want to use a design-build for. How would you incentivize creative thinking and context sensitive thinking in this method? *(Public Participant)*

A: The design-build best-value method allows INDOT to evaluate bids on whatever they determine is of value. For example, aesthetics, how much they involve the community in the design, how long the bridges will last, how quickly they can build it – those are all factors that can be judged. INDOT has an opportunity in this method to define and require these things, and much more. INDOT has experience with this method – Ohio River Crossing for example – where

aesthetics were built in as a specific requirement. The items that have been brought up today can be evaluated as part of the process. *(Project Team)*

Q: We all think we have a better situation and something more pedestrian friendly, but how are we going to pay for this? The feds have \$250 million, so if we're going to do this we have to have more. How are we going to pay for it? I hate to bring up the sports complexes, but we raise funds for those. How do we get the people in this room to put the pressure on to raise these funds? *(Public Participant)*

A: As we develop other alternatives, INDOT will have a better understanding of cost and may investigate further, but we just don't know cost yet. *(Project Team)*

Q: I wish I would see more city involvement. INDOT has to use city infrastructure, so why isn't the city more involved in the process? *(Public Participant)*

A: From INDOT's perspective, we've been engaged with the city since the project started with HNTB coming on board to work for INDOT six months ago. Over the past six months, the project team has been meeting with the city at least monthly. *(Project Team)*

Q: Is there any public information available on this city involvement? *(Consulting Party Member)*

A: No. *(Project Team)*

Q: In terms of alternatives, how many of the other cities around the country that have worked to reduce, eliminate are you looking at? Those are best practices. This is an opportunity for people across the U.S. to look at Indy as a best practice, to show how it can really be done. *(Consulting Party Member)*

A: We are looking at what other cities are doing. *(Project Team)*

15. Comments

- Those who live in the area appreciate that you're looking to replace bridges, and appreciate the project. We are encouraged you are looking at alternatives to expanding. We've lived with that slice through our neighborhood and we don't want to expand that negative impact further. We think we can work together to find alternative solutions to make it more livable.
- Noise, air quality, health issues and vibration all need to rise in this discussion.
- If we're designing for the next 20 years, can someone tell me what the City needs to do to reduce the traffic demand on the road? Are there other things (like taxes) to reduce the traffic? Can we chop off all through traffic? We've got to figure out how to reduce traffic demand or we're sunk. Increased pollution will ruin the whole area. You can't open your window in the summer because it's not fresh air. Someone needs to tell the City that if they want to keep it the way it is, and reduce traffic; here is what they need to do.
- The Old Northside is concerned with the scope of the project – that you are only looking at ways to redesign and only looking at the North Split, rather than a larger scope to look at ways to reduce. We are concerned about noise and vibration. Property values are a concern. There are homes on 12th Street between New Jersey and Alabama that are abandoned. When you're confronted with a solid wall instead of a green buffer, it diminishes value. We're concerned with the pedestrian and visual setting of the district. Newer and larger bridges will make it harder to get pedestrian traffic because instead of a 90-second walk under a bridge it's a 120-second walk. You are affecting the visual feel of neighborhoods. Dust is a big deal. Noise is also a strange

thing off the interstate. Sometimes when you're 50 feet away it's fairly quiet but you get another half block down the street and it's rattling all over. *(Project team clarified that a broader scope outside the interchange is currently being looked at)*

- There is a lot of movement in other cities, including removal, and I think it will have a greater prominence in the near future. They need to be considered.
- The Interurban was a great solution to a lot of the issues we're facing today. You drive in your car and take up a hundred square feet. We need to think of a way to compress the amount of space you're taking up. We need to begin thinking collectively – not me, my convenience – instead of taking up more space. Dallas is considering taking away interstates. We need to look at quality of life. A reduced footprint will be more space efficient. I know it costs a lot more money, but you have to look at the long-term costs and quality of life.
- I do not like the term “we” because I don't know who “we” is. It would seem to be that it would be appropriate for the “we” to include the people in this audience to bring perspective to the meeting in terms of how the scope is determined.
- In Holy Cross, we are hearing consistent patterns that this is the existing condition and you aren't going to make it worse. We don't want you to not make it worse; we want you to improve on what's not meeting the needs of the neighborhood today – noise, air, visibility, connectivity, etc. We don't want you to follow the process; we want you to improve on the process.
- I think an expansion would be worse.
- My limited understanding of design-build, best-value is that a point system is used and certain point are higher than others. That's how a contractor is selected. It's important that the criteria we're concerned about (connectivity, quality of life) have a high value on the point award system. There needs to be a focus on more than how quick and cheap it can happen.
- I'd like to suggest that because of the importance of this project the City and State work together to find common ground on what meets the transportation needs but also what the city needs for vitality and economic development. I think there are creative tools the City could provide. If the consideration could be made to include the City deeply in finding a solution that meets these needs, I think creative funding would be revealed.
- Those of us who have met with the City have found there is no opinion in City Hall. They know of the project but have no opinion.
- Those of us at the AIA meeting last night heard the letter read by the deputy mayor. I'd like to reiterate that there should be a relationship between INDOT, the City and the MPO.
- We would like to make sure you are listening very carefully – we know you are today – and this has to go up the chain at INDOT and the City. There was a mistake made 50 years ago when the interstate was built, where people had no voice. This has changed over the past 30 years. So we implore you to do everything you can to not make this a canyon city. We need to accommodate needs for transportation to get people to and from their homes. We want the city to be connected, not disrupted. There are high

emotions about this. Everyone has been pretty sedate in this room and I want the emotion to come across.

- I recognize that there is a high regulatory component, but I encourage you to look at high quality alternatives. Our neighborhood doesn't see looking at other alternatives as a bad thing.
- Seattle has Amazon's first headquarters and they have drastically changed their interstate through the city. Maybe we should be the headquarters too and change drastically.

I-65/I-70 North Split Interchange
Reconstruction Project

Section 106
Consulting Parties Meeting #2

January 26, 2018

Agenda



- Welcome & Introductions
- Purpose of Meeting
- Section 106 Consultation Process
- Project Overview
- Original Area of Potential Effects (APE)
- Historic Properties
- State Certificate of Approval Dual Review Process
- Archaeology Update
- Traffic Diversion & APE Expansion Methodology
- Consulting Party Comments & Responses
- Next Steps
- Questions

Meeting Purpose/Ground Rules

Purpose of the Meeting

- Section 106 Consulting Party update

Meeting Ground Rules

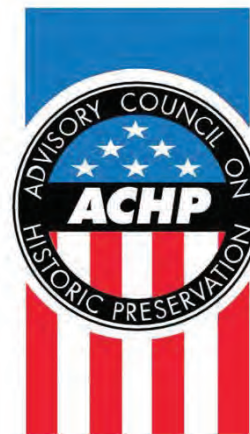
- Consulting Parties encouraged to participate
- Not intended to be a public information meeting
- If space allows, members of the public may observe but not participate
- Please save your questions until the end
- Be respectful of other Consulting Parties
- Submit written questions/comments

3

Section 106 Consultation Process

What is Section 106?

- Part of National Historic Preservation Act (NHPA) (1966)
- Considers effects of actions on properties listed in or eligible for National Register of Historic Places (National Register)
- Gives Advisory Council on Historic Preservation (ACHP) opportunity to consult



4

Section 106 Consultation Process

Section 110(f) of the NHPA

- Minimizes harm to National Historic Landmarks
- Considers all prudent and feasible alternatives to avoid an adverse effect
- Gives ACHP opportunity to consult



§ 306107. Planning and actions to minimize harm to National Historic Landmarks

Prior to the approval of any Federal undertaking that may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall to the maximum extent possible undertake such planning and actions as may be necessary to minimize harm to the landmark. The head of the Federal agency shall afford the Council a reasonable opportunity to comment with regard to the undertaking.

5

Section 106 Consultation Process



Consulting Party: Individuals and organizations with demonstrated legal, economic, or historic preservation interest in an undertaking

Roles of Consulting Party

- Review information about the project
- Provide input at different steps of the process
- Share views, offer ideas and solutions
- Consider possible ways to avoid, minimize, and/or mitigate effects on historic properties

****If you are not already represented by a current Consulting Party and would like to request Consulting Party status, please send an email to kgillette@hntb.com**

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Section 106 Steps for North Split Project

1. Initiate Consultation

- ~~Early Coordination/APE Letter (Sept. 19, 2017)~~
- ~~Consulting Parties Meeting (Oct. 6, 2017)~~

2. Identify Historic Properties

- Historic Property Report/Consulting Parties Meeting #2 (winter 2018)
- Historic Property Report Additional Information for Traffic/Consulting Parties Meeting



3. Assess Effects of Undertaking on Historic Properties

- Effects Report/Consulting Parties Meeting
- 800.11(e) Document/Finding/Mitigation/Consulting Parties Meeting

4. Resolve any Adverse Effects

- Draft Memorandum of Agreement (MOA) for Review
- Final MOA for Signatures

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Need for Project



North Split Interchange

- One of the most heavily traveled interchanges in the state
- Accommodates over 170,000 vehicles per day
- Operating at full capacity
- Portions constructed almost 50 years ago

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Need for Project

- Many of the existing **32 bridges** need rehabilitation or replacement due to structural conditions
- Deteriorating **pavement conditions** require constant repair and patching for roadway and shoulders
- Current I-65/I-70 North Split interchange has many **complex lane change configurations**
- Reconstructed interchange will **minimize the number of lane changes** drivers must maneuver to get to their destination

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Alternatives Development Process



Project Intent Report

- Completed by INDOT Corridor Development Office in July 2016
- **Preliminary** document that evaluated traffic operations
- Used to identify project needs, develop a **possible traffic** solution, and establish a project budget
- It **is not**:
 - Design plans
 - Preferred alternative

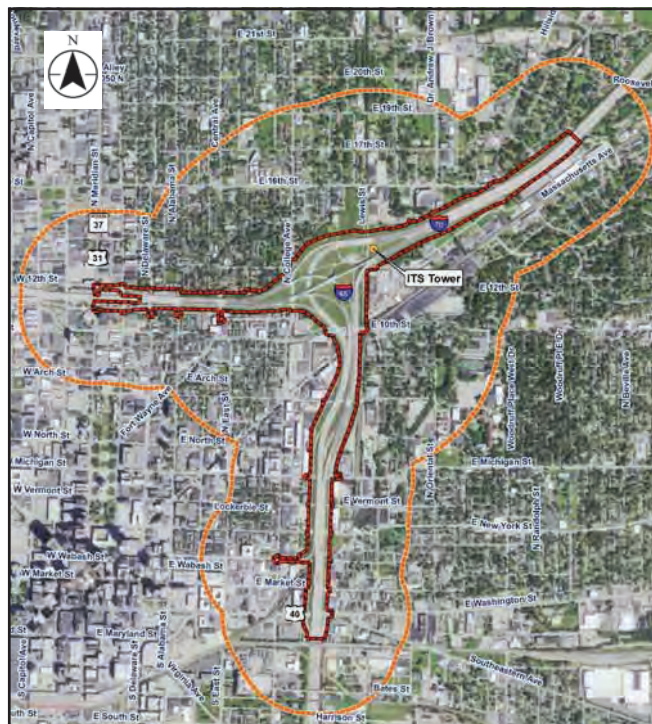


Public Involvement

Robust public involvement plan includes numerous stakeholders, including employers, local/state officials and neighborhoods

- Project website, social media, texts and e-newsletters
- Media relations
- Public meetings
- Advisory committees
- Presentations to local groups





Area of Potential Effects (APE)

- Geographic area within which an undertaking may directly or indirectly change the character or use of historic properties, if any such properties exist
- APE is influenced by scale and nature of undertaking
- Can be different for different kinds of effects caused by undertaking

 I-65/I-70 North Split Interchange Reconstruction Project APE
  I-65/I-70 North Split Interchange Reconstruction Project boundary

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Original APE

- Alternatives are still under development and APE could change
- ½-mile buffer of North Split Interchange
- ¼-mile buffer of proposed work on Interstates and local roads
- Possible 48-foot increase in bridge height (worst-case estimate)
- Reviewed I-74/I-465 interchange (east side) in the field
- Reviewed North Split interchange in the field
 - Communications tower is about 15 feet higher than the top of a 13.5-foot-tall truck on tallest proposed bridge (used as a visual guide)
 - Due to development density, interchange would be minimally visible at ½ mile if visible at all
- Qualified Professional Historian (QP) drove APE to make sure it was appropriate
- Did NOT include temporary traffic pattern changes

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Comment on Original APE

- “Given the density of the corridor (residential and commercial) we should increase the area of impact around the entire project to ½ mile not a ¼ mile as was proposed”
- Project team (including a Qualified Professional Historian (QP)) took a second look at the APE
 - Took photos at 0.25-mile APE line
 - Determined 0.25-mile APE line still appropriate with current assumptions
 - Reviewed with State Historic Preservation Officer, agreed likely appropriate under current assumptions
- If design changes occur and assumptions no longer accurate, APE will be re-examined

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Known Historic Resources in APE

National Register of Historic Places: Official federal list of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture



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What is a historic property?

- Listed individually in or eligible for the National Register of Historic Places (National Register)
- Listed in or eligible for the National Register as part of a historic district
- **Must meet certain criteria**
 - Typically, **50 years** old or older
 - Associated with **significant events** in history
 - Associated with the lives of **people significant** to the past
 - Embodies **distinctive architectural characteristics** or **construction techniques**
 - Must retain **sufficient integrity** (ability to convey its significance)
 - May yield **important information**

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Districts listed in the National Register

- Arsenal Technical High School
- Chatham Arch
- Cottage Home
- Fletcher Place
- Indianapolis Park and Boulevard System
- Herron-Morton Place
- Lockerbie Square
- Massachusetts Ave.
- Old Northside
- St. Joseph Neighborhood



Properties Listed in the National Register

1. Indianapolis Public Library Branch No. 6
2. Prosser House
3. Bals-Wocher House
4. Wyndham
5. Pierson-Griffiths House (Kemper House)
6. Calvin I. Fletcher House
7. Pennsylvania Apartments
8. The Myrtle Fern
9. The Shelton
10. Cathcart Apartments
11. Lodge Apartments
12. Plaza Apartments



Properties Listed in the National Register

- | | |
|--|--|
| 13. The Ambassador | 23. The Spink (Renaissance Tower Historic Inn) |
| 14. Central Library of Indianapolis – Marion County Public Library | 24. William Buschman Block |
| 15. The Burton | 25. Morris-Butler House |
| 16. The Vera and The Olga | 26. John W. Schmidt House (The Propylaeum) |
| 17. Independent Turnverein | 27. Pearson Terrace |
| 18. Cole Motor Car Company | |
| 19. Gaseteria, Inc. | |
| 20. Manchester Apartments | |
| 21. Sheffield Inn | |
| 22. Delaware Court | |

Other National Register Properties

- **National Historic Landmarks**

1. Benjamin Harrison Home
2. James Whitcomb Riley House

- **Previously determined eligible**

1. Martin Luther King, Jr. Park
2. Marion County Bridge No. 252L



Historic Districts Recommended Eligible for the National Register

1. Saints Peter and Paul Cathedral Parish Historic District
2. Windsor Park Neighborhood Historic District
3. Holy Cross/Westminster Historic District



Recommended Individually Eligible for the National Register

1. John Hope School No. 26
2. James E. Roberts School No. 97
3. School #27–Charity Dye Elementary School
4. Knights of Pythias
5. Fame Laundry
6. Stutz Motor Car Company
7. St. Rita's Catholic Church Parish Complex



Listed Only in Indiana Register of Historic Sites and Structures

1. School #27 – Charity Dye Elementary School
2. General Motors Buick Showroom Building



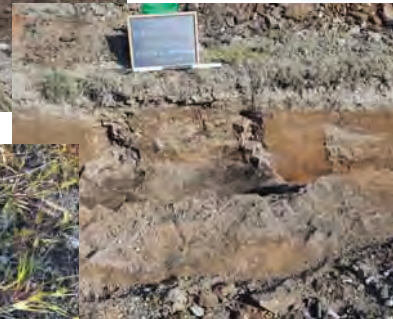
State Certificate of Approval Dual Review Process

- Certificate of Approval (COA) from the Indiana Historic Preservation Review Board required before using state funds to alter, demolish, or remove a historic site or structure if owned by the state or listed in the State or National Registers
- Currently do not know if a COA will be required
- Dual review language alerts Division of Historic Preservation & Archaeology to review project information under both Section 106 and the state law concurrently

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Archaeology Update

- **Phase 1b Survey**
 - Backhoe trenching
 - Completed in interchange infield
 - Report is being revised per INDOT comments
 - Once approved Report will be sent to SHPO & Tribes



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Traffic Diversion & APE Expansion Methodology

- Propose to expand the APE based on anticipated temporary truck traffic increases on city streets during construction
- Unique circumstances of this project:
 - Located in downtown Indianapolis
 - Density of historic properties within the original APE
 - Potential duration for construction
- INDOT and FHWA do **not** intend to expand the APE for potential traffic diversion during construction for all projects in the future.

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Traffic Diversion & APE Expansion Methodology

“Effect”

- “Alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register of Historic Places”
- Temporary impacts to the community beyond the scope of the Section 106 consultation process
 - INDOT & FHWA will work to minimize these impacts
 - Focus for Section 106 is on historic properties

“Adverse effect”

- “When an undertaking may alter, directly or indirectly, any of the characteristics of a historic property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.”

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Traffic Diversion & APE Expansion Methodology

Examples of adverse effect per 36 CFR 800.5(a)(2)

- i. **Physical destruction of or damage to all or part of the property**
- ii. Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties [36CFR part 68] and applicable guidelines
- iii. Removal of the property from its historic location
- iv. Change of the character of the property's use or of the physical features within the property's setting that contribute to its historic significance
- v. Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features
- vi. Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized as qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization
- vii. Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

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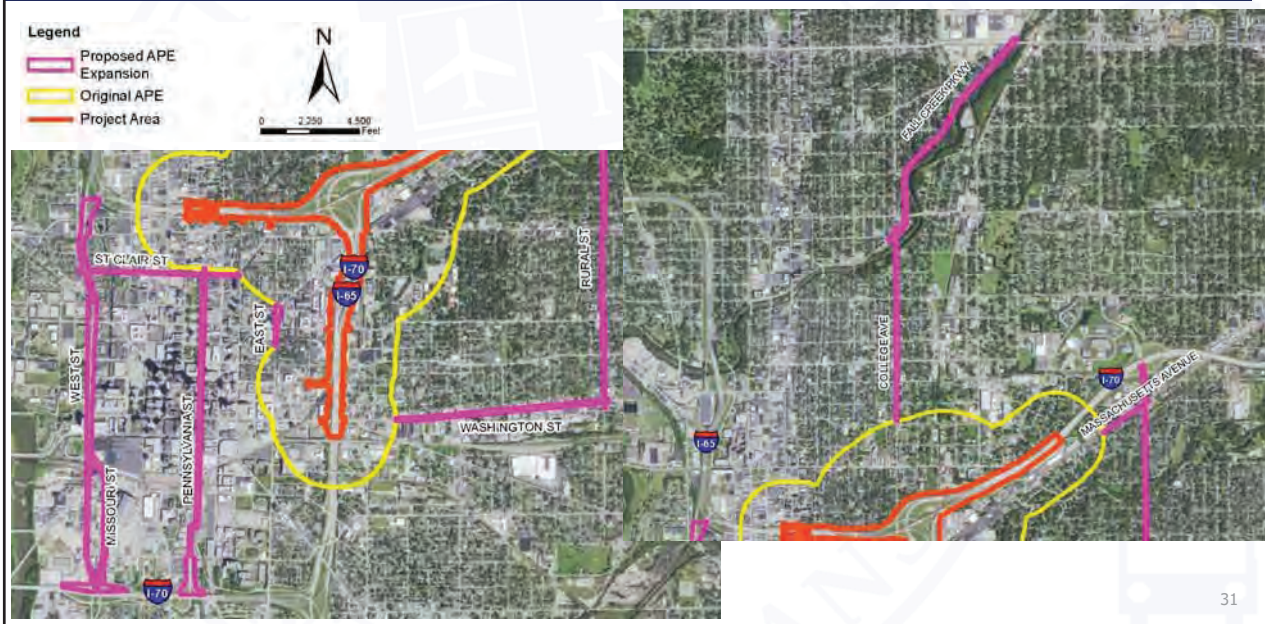
Traffic Diversion & APE Expansion Methodology

- i. **Physical destruction of or damage to all or part of the property**
 - Increases in heavy truck traffic diverted during construction (those making local deliveries in or near downtown)
 - Physical impacts to contributing features within historic districts/properties
 - Brick/stone streets
 - Limestone curbs
 - Stone walls
 - Impacts of heavy trucks on historic bridges
 - APE expansion *not* based on passenger vehicle traffic - most city streets designed to accommodate passenger vehicle traffic



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Traffic Diversion & APE Expansion Methodology



APE Expansion Methodology (continued)

- Two-Tiered Approach

- Tier 1 – Survey the existing right-of-way for:

- Historic or unique features such as brick or stone streets, limestone curbs, stone walls or other potentially contributing features
 - Historic bridges

- Tier 2 – If historic or unique features are identified:

- QP will determine if these features are contributing to an National Register-listed or National Register-eligible historic district or property.
 - Typically these features are not individually National Register-listed or National Register-eligible unless they contribute to a National Register-listed or National Register-eligible historic district or property

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Consulting Party Comments

- Thank you to everyone who provided comments and for the examples
- Comments generally pertained to:
 - APE
 - Aesthetics and visual impacts
 - Noise
 - Lighting
 - Pedestrian/bicycle connectivity
 - Traffic during construction

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Consulting Party Comments

- I-70 Dedicated Truck Lanes (DTLs) Feasibility Study
 - Prepared for Missouri, Illinois, Indiana, and Ohio DOTs
 - Final Report completed in 2011
 - High level planning study
 - INDOT is not pursuing DTLs

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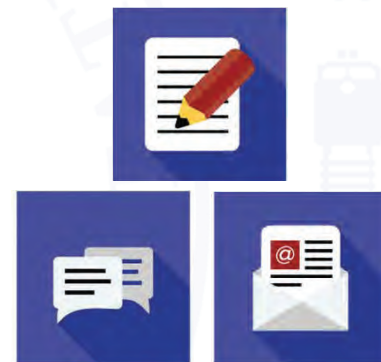
Section 106 Next Steps

- Complete Phase 1b archaeological investigation report
- Next Consulting Party Meeting in ~3-4 months to discuss alternatives

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Consulting Party Feedback

- Please provide comments by **Feb 9, 2018**
- Please provide feedback about:
 - Historic Properties
 - Traffic Diversion & APE Expansion Methodology
 - Meeting location
(speaker phone, wifi, U-shaped tables)
 - Other?
- IN SCOPE –
<http://erms.indot.in.gov/Section106Documents/>
- **Alternatives are under development and will be presented at a later meeting for review and comment**



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Questions/Comments

Project Contact

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CONSULTING PARTIES MEETING NO. 3, MAY 21, 2018



MEETING AGENDA

Date: May 21, 2018
Time: 6 p.m. to 7:30 p.m.
Meeting: North Split Consulting Parties Meeting #3
Location: Indiana State Museum, Indianapolis, IN

1. Welcome & Introductions
2. Purpose of Meeting
3. Section 106 Consultation Process
 - What is Section 106?
 - Role of a Consulting Party
 - Section 106 Steps for North Split Project
4. Need for the Project and Project Evolution
5. System-Level Analysis
 - Key Considerations
 - 7 Concepts Evaluated
 - Concept Comparison
 - Conclusions
6. Next Steps
7. Discussion and Questions
8. Adjourn



MEETING SUMMARY

Date: May 21, 2018
Time: 6:00 p.m. – 7:30 p.m.
Meeting: Consulting Parties Meeting #3
Location: Indiana State Museum, Indianapolis

**Complete attendee list begins on page 7*

1. Introductions

Kia Gillette from HNTB started the meeting by thanking everyone for joining. Consulting Parties and Project Team members went around the room and introduced themselves as did those who participated via phone.

2. System-Level Analysis Overview (see attached presentation)

Kia Gillette and John Myers, also from HNTB, walked attendees through a presentation that overviewed the System-Level Analysis and provided details on each concept.

The Project Team then opened the Question and Answer portion of the meeting.

3. Question (Q) and Answer (A) Period

The Question and Answer portion of the consulting parties meeting was a time for consulting party members and members of the public to ask questions. The Project Team provided responses. Consulting party members and members of the public were also able to make comments for the public record during this time.

(Q) What will happen as part of the North Split project and how will the System-Level Analysis guide the project?

(A) The System-Level Analysis looked at the entire downtown interstate system, recognizing that the North Split has the urgent need to be addressed. The team is just now starting to develop alternatives for the North Split interchange. Through the Environmental Assessment (EA), which is approximately a two-year process, a range of alternatives will be presented, then those will be narrowed down, and finally a preferred alternative will be selected. The Project Team reiterated they do not know what the preferred alternative will be, and there will be multiple opportunities for public involvement throughout the process.

(Q) How does the \$250 million currently allocated for the North Split project compare to the costs shown in the System-Level Analysis. Specifically, how much larger are the footprints of those concepts compared to the North Split.

(A) The physical boundaries are very different. The System-Level Analysis examined the entire downtown interstate system. INDOT does not currently have money budgeted for the entire system. The cost ranges in the analysis do not represent budgeted and funded costs but rather represent estimated costs for the concept in the entire system. The North Split project is already budgeted and funded.

(Q) Is the budgeted cost for the North Split to simply fix what's currently there?

(A) The budget is based on the upgrade option INDOT was considering in 2016. Other alternatives are currently being developed. The final cost may be less or more than the \$250-\$300 million, depending on what the preferred alternative includes.

(Q) Something must be done because there is a safety issue, so is the No-Build a real option and why there is no cost associated with it in the comparison chart?

(A) The No-Build concept was looked at because it's a requirement of the National Environmental Policy Act (NEPA) process and it provides a point of comparison. The No-Build includes projects that are already planned and funded. For example, work will be done this summer on a handful of bridges in the North Split to put band-aids on them as the NEPA process is completed. There would be dollars spent in the No-Build, but it would only be planned projects.

(Q) What items are included in the maintenance costs in the No-Build?

(A) Over time with a No-Build situation, INDOT would still have to do some maintenance work. Travel lanes would have to close to do this work. There would be impacts to traffic. For the North Split alternatives, the No-Build option will carry a zero construction dollar cost because it will only include planned projects with already programmed costs.

(Q) Is there is a difference between the No-Build – or doing nothing/doing no harm – and stabilizing for a period of time?

(A) As the North Split alternatives are developed, there will be a No-Build option, as well as options that include just replacing what is already there. Alternatives will be presented at a future meeting.

(Q) Will the North Split remain the exact same as it is today? There is concern over more noise, higher walls, and a larger footprint with more lanes.

(A) The Project Team reiterated that they are currently in the process of developing alternatives. The Consulting Parties will know details about the alternatives once they are available.

(Q) What is the band-aid work on the bridges mentioned earlier?

(A) Within the North Split there are 32 bridges and late this summer INDOT will be doing maintenance on seven of them. The fixes being performed will allow INDOT to get a few more years out of the bridges for a nominal cost. This work will get the bridges to the point of doing the complete North Split project.

(Q) How can the North Split be segmented as a single project and not require a much larger review through the EA to look at the system as an entire project? Since they are linked, how will that be handled from a technical and legal process.

(A) INDOT must demonstrate that a project has independent utility, or can function by itself. This will be addressed in the Purpose and Need for the project.

(Q) Can you provide further description of what is meant by “independent utility”?

(A) Part of FHWA’s decision-making process is to determine whether a project has independent utility, meaning it is a stand-alone project and provides benefits without forcing adjacent projects. In addition, there must be logical termini – a start and an end. Often for interstates the logical termini is from interchange to interchange.

As the team is looking at the North Split, we will be determining what makes sense – whether there is independent utility. The team will ask themselves whether there could be different solutions within the project termini.

Consulting Parties will learn more about the Purpose and Need when it is released to the public. It identifies why a project is being done. The alternatives are developed to meet those needs and solve the problems identified.

(Q) The North Split will have an impact on historic structures and neighborhoods, and that is a concern. Why expand lanes if the problem being solved is to fix aging bridges? Is expanding traffic necessary?

(A) No decisions have been made at this point, so it is unknown whether added lanes will be proposed. Alternatives are just now being developed. There is a process to follow. Consulting Parties will have the opportunity to review the alternatives and comment on effects to historic properties.

(Q) What assumptions was the traffic analysis based on and what time of day is being looked at, because based on what I see from home, Indianapolis only has a rush half-hour?

(A) The traffic analysis was based on morning and evening peak periods. Traffic counts show the peaks to be longer than one-half hour. Information will be shared as alternatives are developed.

(Q) Why are the through traffic numbers in the System-Level Analysis around 10 percent when previous materials showed 25-30 percent? Did the location-based services look at a smaller area and that's what skewed the numbers?

(A) The 25-30 percent was based on a preliminary estimate, not the traffic model used in the System-Level Analysis. The 10 percent surprised the Project Team as well but it was approached using three different methods and each produced the same result. The location-based services data from cell phones used about a 20 percent sample so there could always be a slight variability.

(Q) How accurate can the traffic model be when looking at options as different as freeway expansion or boulevards?

(A) The tools used for the System-Level Analysis are the best tools available for analyzing networks with different types of roadways. These models are very effective for looking at different facility types in the same network.

(Q) Does INDOT plan to study economic development since some of the numbers are so large they are intimidating, and it would be helpful to know what funds could be allocated to each concept through property tax, sales tax, home tax, etc.

(A) INDOT does not plan to do an economic development study that looks at the redevelopment of excess right-of-way, nor any additional system-level studies. At this point, it is not known who will take the study forward. Economic development is one of many topics that deserves more study.

(Q) When people attend the public open house and see the \$5.5 billion price tag they will get scared and not understand that there could be creative funding options. Will there be someone on-site to talk about this?

(A) There will be multiple people at the public open house for people to talk with and ask questions. We hope people will attend the open house and ask questions for a good dialogue. The System-Level Analysis looked at the most basic issues. It was not intended to answer all questions about these concepts. INDOT did not pick or eliminate an option because it recognized an additional study was needed. That study could be led by the City, the Indianapolis Metropolitan Planning Organization (MPO), or another planning organization.

(Q) Is it correct that no financial expert or economist reviewed the seven concepts?

(A) That is correct. Consistent with the intent of the study, specialists looked at performance, cost, and impact which the team believes to be a good start.

(Q) What percentage of the 10 percent through traffic was traveling to a different state and what is the significance of that number?

(A) The study did not look at what percentage of through traffic was traveling to a different state. The data was used to get a general idea of how much traffic could be diverted to I-465 and whether that volume would be significant enough allow boulevards, which can handle much less volume than interstates, to function effectively. The data gave a point of reference with respect to these diversion opportunities.

(Q) The 10 percent number was surprising, could you confirm that if a person entered I-465 from 71st Street on the northwest side, traveled on I-70 to the other side of I-465, they wouldn't be counted in that 10 percent? It was noted that a motorist could backtrack only slightly to go around on I-465 and avoid I-70 altogether.

(A) Some trips could do that. These would not be identified in the first two analysis methods, but the model would account for this option in the third method. There are some offsetting factors in the other direction as well. For instance, it is unlikely that every single through trip would divert to I-465. Most of the numbers were actually lower and were rounded up to 10 percent. The 10 percent is an approximation and point of reference. It is not intended to be precise.

(Q) Regarding the location-based service data, if a person has a flip phone and drives a FedEx truck through Indianapolis, would that person have been counted? Do non-smartphones get counted?

(A) No, not every driver is counted. The location-based service data has a 20 percent sampling rate. This is an acceptable percentage for comparison.

(Q) I was astonished after reading the report and finding a small improvement in performance with the most aggressive expansion (Concepts #3 and #4). Was this a surprise to the Project Team?

(A) Concepts 3 and 4 are identical in performance, this was not a surprise. The reduction percentage was based on the entire study area – freeways and local roads, not just the interstates. Actual reduction in delay would be more significant in various areas.

(Q) Recognizing that the Project Intent Report included a plan with more lanes, wouldn't there be a commitment to expand the entire system if expansion occurs in the North Split?

(A) It is not known at this point whether any expansion will occur. The Project Intent Report was done by INDOT to estimate future funding. The Project Team is now investigating the Purpose and Need, conducting public involvement activities, and developing a range of alternatives. More information will be available once alternatives are developed.

(Q) Will INDOT look seriously at environmental impacts, economic development impacts, community impacts, and pollution as they move forward with designing alternatives for the North Split? If these are going to be looked at, who will be brought to the table to make those assessments?

(A) As the project moves into the EA phase, the Project Team will begin looking at a full range of impacts. INDOT works with the Indianapolis MPO, Indiana Department of Environmental Management (IDEM), and the U.S. Environmental Protection Agency (USEPA) to determine what air quality studies are required. Connectivity both across and under the interstates will be considered. For aesthetics, the Project Team will look at whether there would be retaining walls, or whether other options can be used. The Project Team includes a range of qualified professionals to assist with these analyses.

(Q) What about the role of CSX? How does that come into play for what INDOT is doing and how do the two interact?

(A) The railroad does impact the project as it causes pinch points within the North Split project. INDOT will avoid impacting the railroad.

(A) Consulting Party suggested depressing the interstate on the east side and elevating the CSX rail line to solve the current issues with trains in that area.

(Q) During HyperFix people survived that closure. Couldn't we simply remove the interstates?

(A) During HyperFix, only the mainline of the east leg was closed. Many portions of the interstate, including the entire north and south legs of the inner loop and the majority of east leg exits, were still open.

(Q) What impacts would the system-level concepts have on historical properties?

(A) The System-Level Analysis looked at direct impacts to historic properties at a high-level but further studies would be needed to better define the impacts. Moving forward with the North Split project, effects to historic properties will be evaluated as part of the Section 106 consultation process.

Additional comment from a Consulting Party: Overall preference would be the No-Build within the System-Level Analysis. Address safety concerns but slow down the North Split project.

4. Closing

The meeting concluded with a reminder of the June 7 comment period and reminder of the public open house on May 23 from 3-7 p.m. at the Biltwell Event Center.

Attendees:

Consulting Parties	
Alicia Baker	John Boner Neighborhood Centers
Glenn Blackwood	Fletcher Place Neighborhood Association
Desiree Calderella	Fountain Square Neighborhood Association
John Carr	IDNR – Division of Historic Preservation and Archaeology
Garry Chilluffo	Historic Urban Neighborhoods of Indianapolis (HUNI)
Jeffrey Cristoffersen	Lockerbie Square People’s Club
Marsh Davis	Indiana Landmarks
Pat Dubach	Holy Cross Neighborhood Association
Denise Halliburton	Ransom Place Neighborhood Association
Pete Haupers	St. Joseph Neighborhood Association
Charlie Hyde	Benjamin Harrison Presidential Site
Joe Jarzen	Keep Indianapolis Beautiful
Jim Jessee	Cottage Home Neighborhood Association
Danielle Kauffmann	IDNR – Division of Historic Preservation and Archaeology
Marjorie Kienle	Historic Urban Neighborhoods of Indianapolis
Paul Knapp	Interstate Business Group
Jennifer Milikin	Urban League of Indianapolis
Patricia Perrin	Property Owner
Charles Perrin	Property Owner
Jordan Ryan	North Square Neighborhood Association
Tony S.	St. Joseph Neighborhood

Project Team	
Michelle Allen	FHWA
Patrick Carpenter	INDOT
David Cleveland	Corradino Group
Andy Dietrick	INDOT
Kia Gillette	HNTB
Ali Hernandez	Borshoff
Emily Kibling	Borshoff
Leah Konicki	ASC Group
Scott Manning	INDOT
Laura Morales	HNTB
John Myers	HNTB
Anthony Ross	INDOT
Seth Schickel	HNTB
Scott Siefker	TSW
Ron Taylor	TSW



Welcome

- Since we met in January:
 - Conversations with elected officials, neighborhood groups, Rethink 65/70 Coalition, business organizations and others
 - INDOT directed the Project Team to develop a System-Level Analysis for downtown interstates
- Today we are sharing the results of the System-Level Analysis with Consulting Parties



Section 106 Consultation Process

What is Section 106?

- Part of National Historic Preservation Act (NHPA) (1966)
- Considers effects of actions on properties listed in or eligible for National Register of Historic Places (National Register)
- Gives Advisory Council on Historic Preservation (ACHP) opportunity to consult



Section 106 Consultation Process



Consulting Party: Individuals and organizations with demonstrated legal, economic, or historic preservation interest in an undertaking

Roles of Consulting Party:

- Review information about the project
- Provide input at different steps of the process
- Share views, offer ideas and solutions
- Consider possible ways to avoid, minimize, and/or mitigate effects on historic properties



Section 106 Steps for North Split Project

1. Initiate Consultation

- Early Coordination/APE Letter (Sept. 19, 2017)
- Consulting Parties Meeting (Oct. 6, 2017)

2. Identify Historic Properties

- Historic Property Report/Consulting Parties Meeting #2 (Jan. 26, 2018)
- North Split Alternatives/Historic Property Report Additional Information for Traffic/Consulting Parties Meeting (summer/fall 2018)

3. Assess Effects of Undertaking on Historic Properties

- Effects Report/Consulting Parties Meeting
- 800.11(e) Document/Finding/Mitigation/Consulting Parties Meeting

4. Resolve any Adverse Effects

- Draft Memorandum of Agreement (MOA) for Review
- Final MOA for Signatures



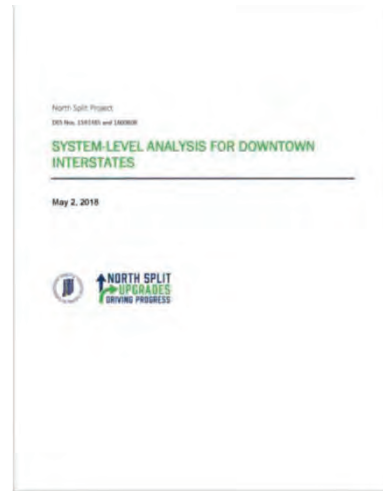
Project Evolution

- Following federal environmental review (NEPA) process for the North Split Project
- Project introduction, public involvement and early coordination with agencies initiated as a part of NEPA
- **System-Level Analysis** for downtown interstates developed as fact finding study by INDOT in response to public comments
- Analysis published at www.northsplit.com



System-Level Analysis

- Studies all downtown interstates
- Not intended to answer all questions or address all issues
- Focus on basic parameters: performance, cost, and impacts
- Does not identify a specific plan for downtown interstates
- Provides a starting point for possible future studies



Components Reviewed



Performance – How well does the roadway system function (current conditions)?



Cost – How much will it cost to construct?



Impacts – How will it affect the community?

- local street and neighborhood traffic
- construction/MOT
- neighborhood connectivity/visual continuity
- right-of-way needs
- historic resources
- recreational areas and trails
- natural resources



Decommissioning Existing Interstates

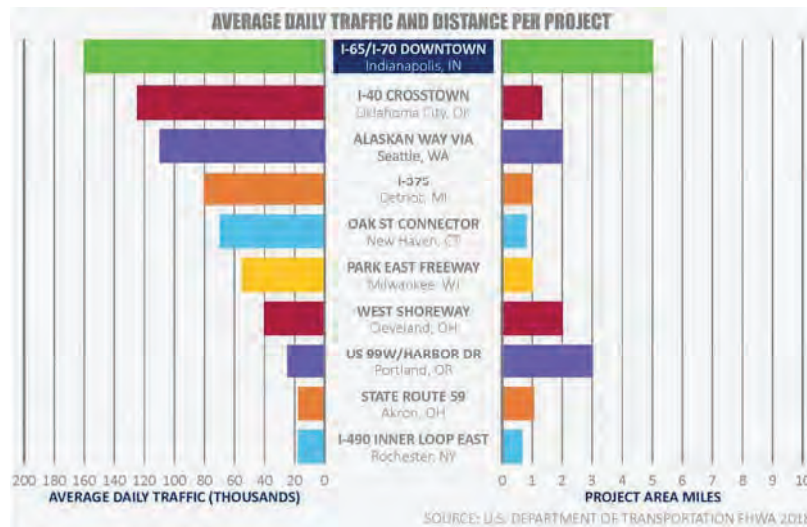
- Reviewed urban freeway treatments nationwide
- Where decommissioning works
 - Low traffic volumes
 - Short sections of uncompleted freeways
 - Barriers to waterfronts
 - Remaining segments after realignment
 - Parallel with other freeways
- Focus of System-Level Analysis is, "What works in Indianapolis?"

DECOMMISSIONING PROJECT EXAMPLES

- US 99W/Harbor Drive, Portland, OR
- Park East Freeway, Milwaukee, WI
- I-490 Inner loop East, Rochester, NY
- State Route 59, Akron, OH
- West Shoreway, Cleveland, OH
- I-375, Detroit, MI
- Route 34/Oak Street Connector, New Haven, CT
- I-40 Crosstown Expressway, Oklahoma City, OK
- Route 99/Alaskan Way Viaduct, Seattle, WA
- Scajaquada Expressway, Buffalo, NY
- I-345, Dallas, TX
- I-375, Detroit, MI
- I-980, Oakland, CA
- Route 710, Pasadena, CA
- I-490 Inner Loop North, Rochester, NY
- I-280 Spur, San Francisco, CA
- I-81, Syracuse, NY
- Route 29, Trenton, NJ



Decommissioning Existing Interstates



Concepts

1. No-Build (maintain existing)
2. Transportation System Management (TSM)
- divert traffic to I-465 or to transit*
3. Upgrade existing interstates
4. Depress downtown interstates*
5. Replace interstates with at-grade boulevards*
6. Construct at-grade boulevards + interstates in tunnels*
7. Construct new interstate link – new I-65 west leg tunnel



** Suggested by community groups*



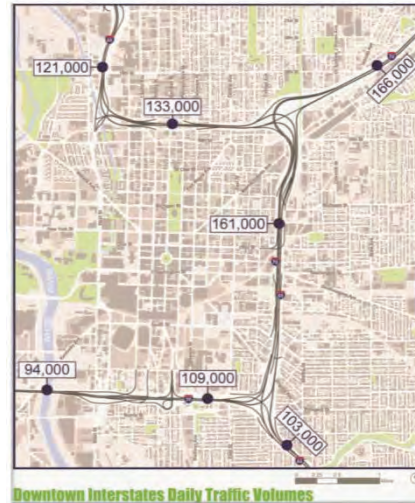
CONCEPT 1

No-Build

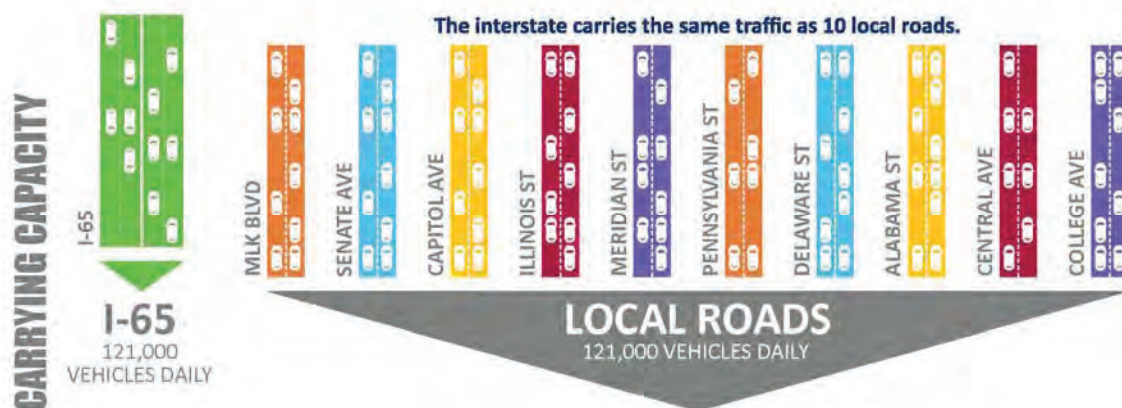


Concept 1: No-Build

- Maintain the existing interstate system with no operational improvements
- Preserve number and location of lanes
- Keep existing ramp connections to local streets
- Basis of comparison for other concepts



Concept 1: No-Build



Concept 1: No-Build

- **Performance**

- Total delay is baseline for other concepts
 - 21,346 hours (AM peak)
 - 23,471 hours (PM peak)

- **Cost**

- Cost to maintain inner loop over next 30 years is approximately \$437M

- **Impacts**

- Regular traffic disruption due to interstate closures to replace pavement and bridges



CONCEPT 2

Transportation System Management



Concept 2: Transportation System Management

- Reduce traffic demand on downtown interstates
- Three potential actions
 - Divert through trips* to I-465
 - Divert downtown interstate trips to transit
 - Divert trips with tolling

**Through trips = Interstate trips from outside I-465, through downtown, to outside I-465*



Concept 2: Transportation System Management

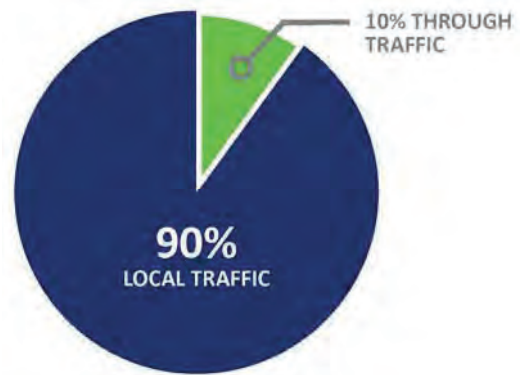
- **Diversion to I-465**
 - Through trips estimated 3 ways
 - Trace trips using IMPO travel demand model
 - Trace trips using location-based services of smartphones
 - Test unlimited capacity on I-465 using IMPO travel demand model



Concept 2: Transportation System Management

• Diversion to I-465

- Through trips estimated 3 ways
 - Trace trips using IMPO travel demand model
 - Trace trips using location-based services of smartphones
 - Test unlimited capacity on I-465 using IMPO travel demand model
- Each estimate showed around 10% through trips on downtown interstates in peak periods
- Diverting through trips to I-465 would not materially affect performance of concepts



2: Transportation System Management

• Diversion to Transit or Tolling

- Transit: Analysis of bus rapid transit (BRT) ridership shows inner loop traffic reduction less than 1%. Most traffic diversion to BRT will be from local streets, not interstates
- Tolls: Could only be effective for diverting through trips to I-465 if there were more through trips.

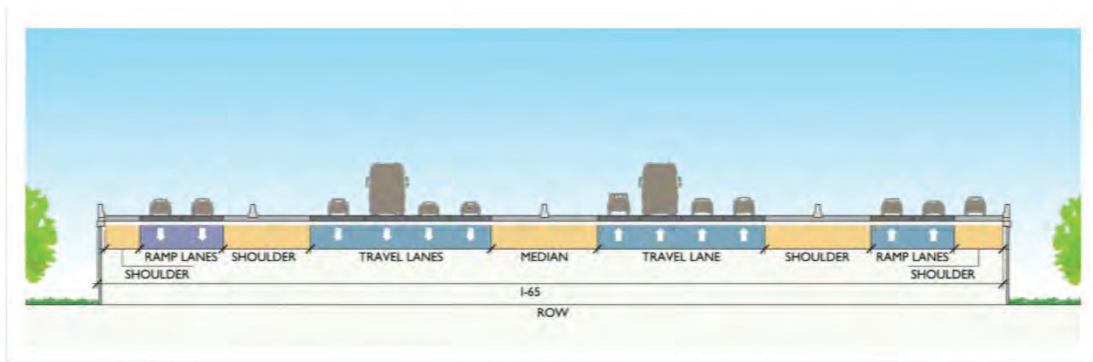


CONCEPT 3

Upgrade Existing Interstate System



Concept 3: Upgrade Existing Interstate System



Concept 3: Upgrade Existing Interstate System

- **Performance**

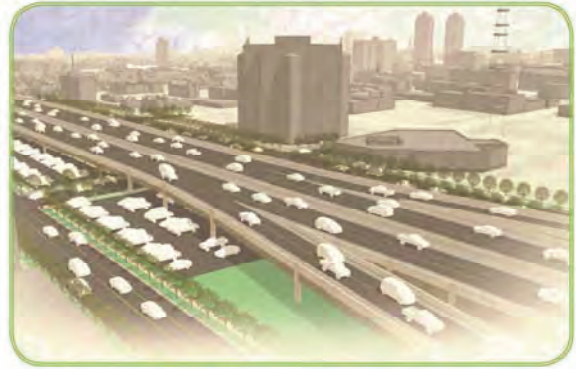
- Total delay is REDUCED compared to existing
 - 10% less in AM peak, 6% less in PM peak
- Reduced congestion on interstates

- **Cost**

- Construction = \$900M - \$1.6B

- **Impacts**

- Local street traffic generally unchanged
- 5 years of construction
- 1 to 5 acres new right of way; 5 to 10 relocations
- Visual quality mixed, connectivity good

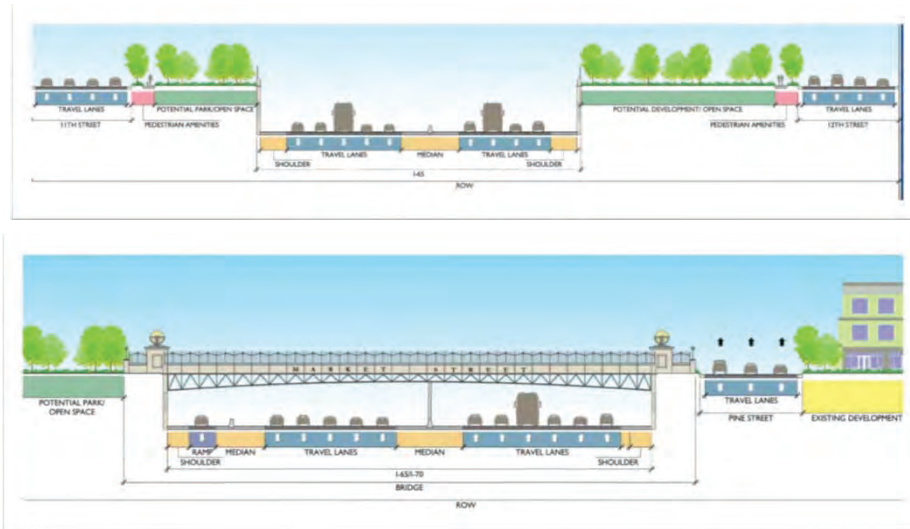


CONCEPT 4

Depress Downtown Interstates



Concept 4: Depress Downtown Interstates



Concept 4: Depress Downtown Interstates

- **Performance**

- Total delay is REDUCED compared to existing
 - 10% less in AM peak, 6% less in PM peak
- Reduced congestion on interstates

- **Cost**

- Construction = \$1.5B - \$2.4B

- **Impacts**

- Local street traffic generally unchanged
- 6 years of construction
- 5 to 10 acres new right-of way; 10 to 15 relocations
- Visual quality and connectivity good



CONCEPT 5

Replace Interstates with Boulevards



Concept 5: Replace Interstates with Boulevards



Concept 5: Replace Interstates with Boulevards

- **Performance**

- Total delay is MUCH HIGHER than existing
 - 40% more in AM peak, 145% more in PM peak
- High level of congestion on all boulevards

- **Cost**

- Construction = \$500M - \$900M
- Local street investments not included

- **Impacts**

- Large traffic increases on streets, interstate queues
- 4 years of construction
- 1 to 5 acres new right of way; 1 to 5 relocations
- Potential for excess right of way
- Visual quality good, connectivity affected by traffic levels

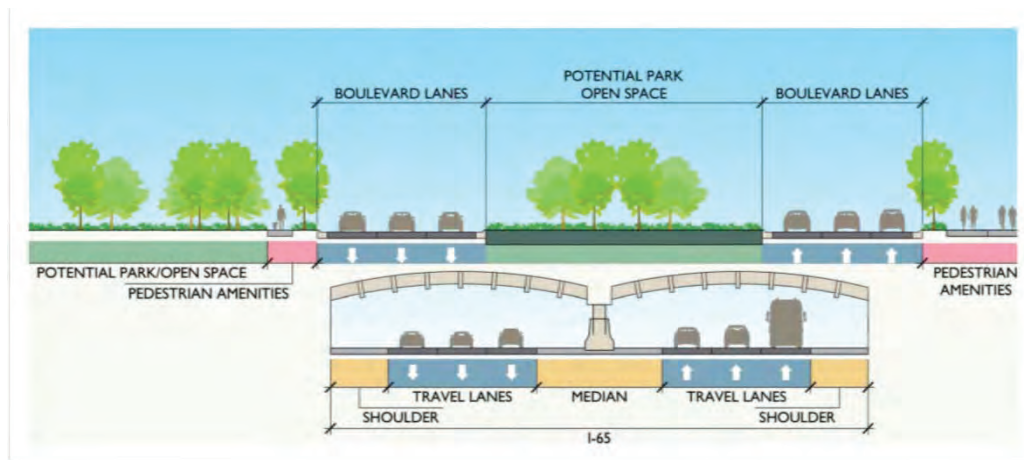


CONCEPT 6

Replace with Boulevards & Tunnels



Concept 6: Replace with Boulevards and Tunnels



Concept 6: Replace with Boulevards and Tunnels

- **Performance**

- Total delay is SIMILAR to existing
 - 9% less in AM peak, **3% more** in PM peak
- High congestion levels on boulevards

- **Cost**

- Construction = \$3.3B - \$5.5B

- **Impacts**

- Local street traffic generally unchanged
- 10 years of construction
- 5 to 10 acres new right-of way; 5 to 10 relocations
- Visual quality good, connectivity mixed

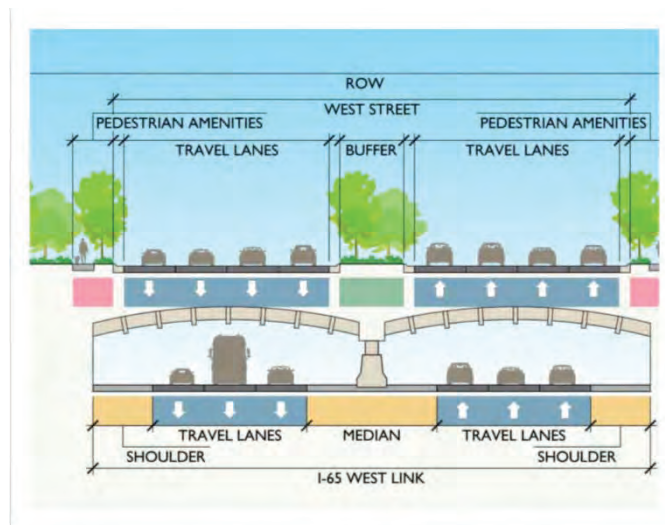


CONCEPT 7

Construct New Interstate Link

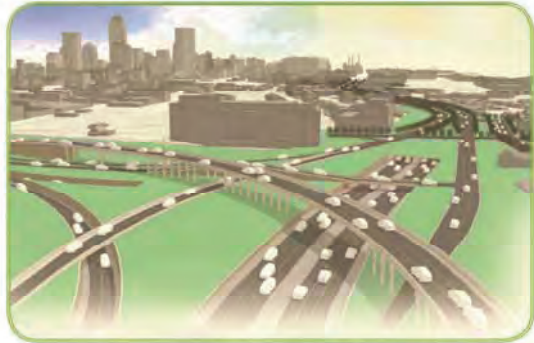


Concept 7: Construct New Interstate Link



Concept 7: Construct New Interstate Link

- **Performance**
 - Total delay is HIGHER than existing
 - 23% more in AM peak, 24% more in PM peak
 - North boulevard highly congested
- **Cost**
 - Construction = \$1.6B - \$2.6B
- **Impacts**
 - Traffic increase on streets, south and east
 - 7 years of construction
 - 40 to 50 acres new right of way; 30 to 40 relocations
 - Visual quality and connectivity mixed



Concepts at a Glance

Concept	Performance	Costs	Impacts			
	Total Network Delay (compared to existing)	Estimated Costs	Time of Construction	Visual/ Connectivity	ROW/ Total Area	Relocations (Properties)
1 - No Build	No change	No change	--	No change	No change	No change
2 - TSM	--	--	--	--	--	--
3 - Upgrade Existing Interstates	10% less delay (AM) 6% less delay (PM)	\$900M - \$1.6B	5 years	Mixed/Good	1-5 acres	5-10
4 - Depress Downtown Interstates	10% less delay (AM) 6% less delay (PM)	\$1.5B - \$2.4B	6 years	Good/Good	6-10 acres	10-15
5 - Boulevards to Replace Interstates	40% more delay (AM) 145% more delay (PM)	\$500M - \$900M	4 years	Good/Mixed	1-5 acres	1-5
6 - Boulevards and Tunnels	9% less delay (AM) 3% more delay (PM)	\$3.3B - \$5.5B	10 years	Good/Mixed	5-10 acres	5-10
7 - West St. Interstate Tunnel and Boulevard	23% more delay (AM) 24% more delay (PM)	\$1.6B - \$2.6B	7 years	Mixed/Mixed	40-50 acres	30-40



What does this mean for downtown interstates?

- Many issues to consider in defining the future of downtown interstates
 - System-Level Analysis looked at core issues of performance, cost, and impacts
 - A starting point for future studies
 - The community should take the time necessary to decide the future of downtown interstates.
-
- Please submit comments on System-Level Analysis by June 7.



What does this mean for the North Split Project?

- The North Split interchange needs to be reconstructed in 2 to 4 years due to bridge and pavement conditions.
 - Given this timeframe, the interchange will need to connect with existing interstates.
 - The cost of reconstructing the North Split interchange now does not automatically preclude future options for the downtown interstate system.
 - The Project Team is now starting to develop alternatives for the North Split Project.
-
- Public comment opportunities will continue throughout the North Split Project.
 - Public comment period for alternatives anticipated late summer/fall 2018.



North Split Project Next Steps

- Environmental assessment (EA) for the North Split
 - Develop alternatives
- Continue public involvement and feedback
 - Alternatives
 - Neighborhood identity, bicycle/pedestrian connectivity, aesthetics, lighting, public art, landscaping, and noise
 - Section 106 consultation with Consulting Parties



Public Open House

- May 23, 2018
- Biltwell Event Center – 950 S. White River Pkwy Dr.
- Open house: 3 – 7 p.m.
- Presentations at 4 and 6 p.m.
- June 7: Public comment period for System-Level Analysis ends



Questions

Report Available: www.northsplit.com

Submit Comments: info@northsplit.com

Contact:

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Public Involvement

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Indianapolis, IN 46244

Phone: 317.749.0309

