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December 21, 2021

Leah J. Konicki
Principal Investigator – Architectural Historian
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, Indiana 46256

Federal Agency: Indiana Department of Transportation (“INDOT”),
on behalf of Federal Highway Administration, Indiana Division (“FHWA”)

Re: Addendum historic property report (Konicki/Terheide/Hillard/Terpstra, 11/23/2021) for the
County Line Road Added Travel Lanes project (Des. No. 2002553; DHPA No. 27053)

Dear Ms. Konicki:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 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,” the staff of the Indiana State Historic Preservation Officer (“Indiana SHPO”) has reviewed your November 23, 2021, submission which enclosed the addendum historic property report (“HPR Addendum”; Konicki/Terheide/Hillard/Terpstra, 11/23/2021), received by our office November 24, 2021, for this project in White River Township of Johnson County and Perry Township of Marion County, Indiana.

Thank you for providing an Addendum to the original HPR (Konicki/Terpstra, 4/13/2021). In our previous response letter, we noted five historic districts determined eligible for inclusion in the National Register of Historic Places (“NRHP”), two in Marion County and three in Johnson County as part of pre-planning for the upcoming Johnson County survey. The HPR Addendum provides additional information to reconsider these eligibility determinations. However, staff from our Survey and Register section maintain that these three districts in Johnson County, in addition to the two districts in Marion County within the project’s area of potential effects are eligible for inclusion in the NRHP.

Rather than responding point by point about the HPR Addendum, we wish to provide the following comments that we believe are higher-level big picture items that would be helpful in evaluating post-war residential subdivisions utilizing information from the *Residential Planning and Development in Indiana 1940-1973* (“MPDF”).

First, many parts of the HPR Addendum were contradictory and the overall methodology presented is not consistent with past guidance. The National Cooperative Highway Research Program’s *A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing*, is utilized in the HPR Addendum for evaluation of mid-century resources in Indiana. While the HPR Addendum acknowledges that the MPDF supersedes this report, we wish to clarify that the national study should not be utilized for evaluation of post-war resources in Indiana. The MPDF has been thoroughly reviewed by

staff at the Indiana SHPO, approved by the Indiana Historic Preservation Review Board, and accepted by the National Register of Historic Places.

Furthermore, the collective statements about subdivision types within the MPDF are not meant to be a black and white checklist for evaluation. Instead, they are general guidance research suggestions that allow for evaluation of an extensive pool of potentially eligible resources. We notice throughout the HPR Addendum that the analysis will state that a subdivision possesses some characteristics of a certain subdivision type, but because it does not possess most or all of the characteristics enumerated in the MPDF, it is not eligible. It is not stated in the MPDF that a property or district must meet all the registration requirements in the manner assumed in this HPR Addendum.

Moreover, we observed multiple inconsistencies and contradictory statements within the HPR Addendum. For instance, the Richards & Landers subdivision was “not popular with builders” yet within a relatively brief period, 109 of its houses, a vast majority, were built by 1960. The Richards & Landers subdivision, to paraphrase, shows no influence from or connection to government assistance or projects, despite being within view of State Road 37 (now I-69), one of Indiana’s wholly public-funded main highways connecting Indianapolis to southern Indiana.

For the Carefree development, the HPR Addendum shows that Pleasant Run defines a boundary of the plat but says the plat does not respond to terrain. The HPR Addendum discounts the presence of a pool and clubhouse within the plat, a sure trait of a Custom Development, by creating a non-existent requirement that the common asset be centrally located (there is also a public school with ample green space at the south end of the development). Another response to natural conditions was overlooked; the entrance that uses what is likely flood-prone land near 407 Leisure Lane to create green space and a formal subdivision entrance. This is close to where a natural asset, Pleasant Run, is crossed by a small bridge. In general, the assertion made repeatedly in the HPR Addendum is that subdivisions are the “canvas” of the land, and that those in glaciated plains cannot be eligible. Though perhaps understated in the MPDF, there is no requirement for dramatic natural assets to be present, only that the planner used what terrain or natural elements were present to enhance the development. Due to changing topography throughout the State, this will vary from region to region and involves complex issues such as flood control.

Several generalizations are repeated throughout the HPR Addendum. The argument that these subdivisions can’t be significant because they are motivated by profit stands out to us. All private subdivisions are and were motivated by profit. The difference lies in how the developer sought to offer their product; some were aimed at the immediate post-war, starter-house market, while others sought to fill a different need.

The generalizations regarding exceptionalism (the subdivision must be the first, best, biggest, etc.) are in error. The National Register can recognize the first, biggest, and so forth of a particular type or style of property, but the National Register mainly recognizes properties that have sufficient traits of a significant property type. There is also no limit on the size of a historic district, whether too big or too small, as long as it conveys its significance. There has never been a set of requirements such as the consultant assumes. As with other parts of the MPDF, the registration requirements are guides to establishing significance, not hard and fast regulations.

Another concept we noticed while reviewing the HPR Addendum is that the beginning and end dates set out in the MPDF (1940 and 1973) were considered hard deadline dates. The time frame within the MPDF is meant to reflect the period of greatest development. Similar to evaluating individual building styles, the timeline is meant to reflect the general time period in which these subdivisions were primarily built, but there may be instances that construction began before or continued after that period due to a variety of circumstances (how long it took for a type to become popular in this part of the country, financial delays, etc.). For example, 75% of the housing was complete in the Wood Creek subdivision within two years of the end point of the MPDF. The National Park Service will accept beginning and end dates outside the dates listed in the MPDF with adequate documentation, thus many of the resources considered non-contributing in the report would be classified as contributing to the district.

We also note throughout the HPR Addendum the numerous subdivisions presented as part of a comparative analysis to the subdivisions within the project’s area of potential effects. In regard to comparative analysis, the goal of this exercise is to

establish a local context and point of comparison between neighborhoods in its proximity. Comparative analysis is used to establish a baseline or threshold for eligibility; once the threshold is established, based on the appropriate context, eligibility for each resource can be determined. Comparative analysis should not be used solely as a means to prove ineligibility.

Overall, we understand and appreciate the time and level of research undertaken to provide more information about these five subdivisions located within the project's area of potential effects. However, we feel that the information provided bolstered the arguments for eligibility rather than proving ineligibility for the NRHP. As previously stated, the planning phase for the resurvey of Johnson County included the identification of eligible historic districts. Based on precedent set for previous surveys, this is accomplished through information gathered from assessor's records, satellite imagery, street view imagery, and windshield survey of the county. The following comments from Survey and Register staff are based on that information:

The Richards and Landers Mt. Pleasant subdivision is a good example of a Transitional Development with American small houses and ranches and is eligible for the NRHP under Criterion A under Community Planning & Development. This subdivision utilizes a grid plan and is placed along a major roadway with easy access to the city. While there are some alterations, the subdivision retains integrity to convey the type of suburb it is.

Wood Creek Estates is eligible under Criteria A and C under Community Planning & Development and Architecture. It is a Custom Development of approximately 100 houses mostly dating to the mid-1970s, composed of ranches, stacked ranches, bi-levels, and split-levels. There are curving streets and culs-de-sac present, and this subdivision is located near churches and commercial development. Wood Creek Estates includes Woodcreek Drive, Pine Oak Court, Birch Court, Hickory Court, Wood Creek Place, Beech Court and Wood Creek Court.

The Carefree subdivision is eligible under Criteria A and C under Community Planning & Development and Architecture. It is a Custom Development composed of approximately 700 houses including a variety of period architecture types and styles, curving streets and culs-de-sacs, a clubhouse and pool, and a public school abuts the plat. It is located along a major roadway with easy access to churches or commercial buildings.

In Marion County, we believe Ridge Hill Trails and Royal Meadows are eligible for the NRHP. Ridge Hill Trails is eligible under Criteria A and C under Community Planning & Development and Architecture. It is a Custom Development subdivision with an interesting curvilinear plan, composed of a variety of styles and types. It remains as an intact "entry-level" Custom Development that is very cohesive and uniform. We wish to point out that Custom Developments do not have to be architect-designed alone, they can be Custom by way of the subdivision builder.

Royal Meadows/Hill Valley Estates is eligible under Criteria A and C under Community Planning & Development and Architecture. It is a good example of a Custom Development composed of a wide variety of types and styles (ranch, bi-level, split-level, stacked ranch) with Neo-Eclectic and Mansard details, among others. The subdivision boasts curvilinear streets with sidewalks and curbs and retains good integrity as an intact "entry-level" Custom Development. Its approximate boundaries include W. Ralston Drive to the north, Meadow Vista Drive to the east, W. County Line Road to the south, and Maple View Drive to the west. Royal Meadow Drive cuts through the middle of the subdivision.

As previously indicated, regarding the archaeological resources, based upon the submitted information and the documentation available to the staff of the Indiana SHPO, we concur with the opinion of the archaeologist, as expressed in the submitted archaeological reconnaissance survey report (Crider/Terheide, 5/27/2021), that the newly identified sites 12Ma1075, 12Ma1076, 12Jo736 and 12Jo737 do not appear eligible for inclusion in the NRHP and no further archaeological investigations are necessary. There is insufficient information to determine whether or not newly identified archaeological sites 12Ma1077 and 12Ma1078 are eligible for inclusion in the NRHP as the site boundaries extend beyond the limits surveyed. However, it appears that the portions of sites 12Ma1077 and 12Ma1078 within the project area are not eligible for inclusion in the NRHP. The surveyed limits should be clearly marked so that unsurveyed portions of these sites are avoided by all ground-disturbing project activities. If avoidance is not feasible, a plan for further archaeological investigations and evaluation of sites 12Ma1077 and 12Ma1078 must be submitted to the Indiana SHPO for review and comment prior to

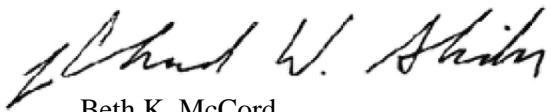
further field investigations. Further archaeological investigations must be conducted in accordance with the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716).

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 -29) requires that the discovery be reported to the Indiana SHPO 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 -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.

The Indiana SHPO staff's archaeological reviewer for this project is Beth McCord, and the structures reviewer is Danielle Kauffmann. However, if you have a question about the Section 106 process, please contact initially the INDOT Cultural Resources staff members who are assigned to this project. Questions about the eligibility of resources should be directed to Paul Diebold or Holly Tate.

In all future correspondence about the County Line Road added travel lanes project in Johnson and Marion counties (Des. No. 2002553), please refer to DHPA No. 27053.

Very truly yours,



Beth K. McCord
Deputy State Historic Preservation Officer

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