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July 6, 2021

Revised July 15, 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: Historic property report (Konicki/Terpstra, 4/13/2021) and archaeological records check and reconnaissance survey report (Crider/Terheide, 5/27/2021) for the County Line Road Added Travel Lanes project in Indianapolis, Marion & Johnson counties, Indiana (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 June 4, 2021 submission, which enclosed the aforementioned reports, received by our office the same day for this project in Perry Township, Marion County and White River Township, Johnson County, Indiana.

The proposed area of potential effects (“APE”) presented in the historic property report (“HPR”; Konicki/Terpstra, 4/13/2021) appears to be of adequate size to encompass the geographic area in which direct and indirect effects of a project of this nature could occur.

As part of mitigation for the I-69 project in Indiana, our office is in the pre-planning phase for the Johnson County survey. Thus, after consultation with staff from our Survey/Register section, we wish to provide the following comments regarding historic resources located within the project’s APE.

For the purposes of the Section 106 review of this federal undertaking, we respectfully disagree with the conclusions of the HPR that there are no resources listed in or eligible for inclusion in the National Register of Historic Places (“NRHP”) within the project’s APE.

In Johnson County, we believe that the Richards and Landers Mt. Pleasant subdivision, Wood Creek Estates, and Carefree subdivision are eligible for inclusion in the NRHP utilizing information from the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form. The Richards and Landers Mt. Pleasant

subdivision is a good example of 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 Criterion 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. As it was not surveyed in the HPR, 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 Criterion A and C under Community Planning & Development and Architecture. It is a Custom Development composed of approximately 700 houses including a variety of architecture types and styles, curving streets and culs-de-sacs, a central clubhouse and pool. 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 Criterion 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 (originally platted as Hill Valley Estates) is eligible under Criterion 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. This subdivision was not identified in the HPR and 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.

We agree with the HPR that Glens Valley and Meridian Park that are detailed in the HPR are not eligible for inclusion in the NRHP.

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).

Thank you for submitting the archaeological site survey forms for sites 12Ma1075, 12Ma1076, 12Ma1077, 12Ma1078, 12Jo736 and 12Jo737 to SHAARD. They have been approved.

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. If you have a question about the eligibility of resources located within the APE, please contact Paul Diebold. In all future correspondence about the County Line Road Added Travel Lanes project in Marion and Johnson 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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