



January 10, 2022

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 to Phase Ia archaeological report (Crider, 11/12/2021) 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 December 21, 2021, submission which enclosed the addendum archaeology report (Crider, 11/12/2021), received by our office December 21, 2021, for this project in White River Township of Johnson County and Perry Township of Marion County, Indiana.

Please see our December 21, 2021 correspondence regarding aboveground resources. This letter is only providing comments on the archaeological resources.

Thank you submitting the addendum archaeology report (Crider, 11/12/2021). There is insufficient information to determine whether or not archaeological site 12Ma1082 is eligible for inclusion in the NRHP as the site boundaries may extend beyond the limits surveyed. However, it appears that the portion of site 12Ma1082 within the project area is not eligible for inclusion in the NRHP. The surveyed limits should be clearly marked so that unsurveyed portions of the site are avoided by all ground-disturbing project activities. If avoidance is not feasible, a plan for further archaeological investigations and evaluation of site 12Ma1082 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).

Please note that site form for site 12Ma1082 has **not** been submitted in SHAARD. Now would be an appropriate time to submit the form for review and approval. Please send an email notification to Beth McCord once the form has been submitted.

We reiterate our comments regarding the previously recorded 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

BKM:bmk

emc: Kari Carmany-George, FHWA
Erica Tait, FHWA
Anuradha Kumar, INDOT
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