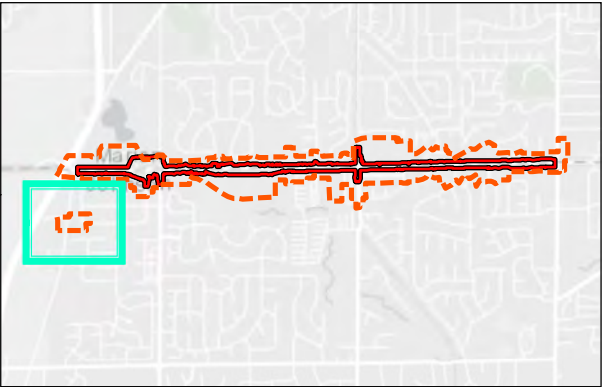


APPENDIX C: PHOTOGRAPHS



- Project area
- APE
- Photograph location

Base: Aerial photograph
2016

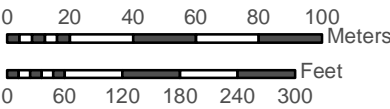
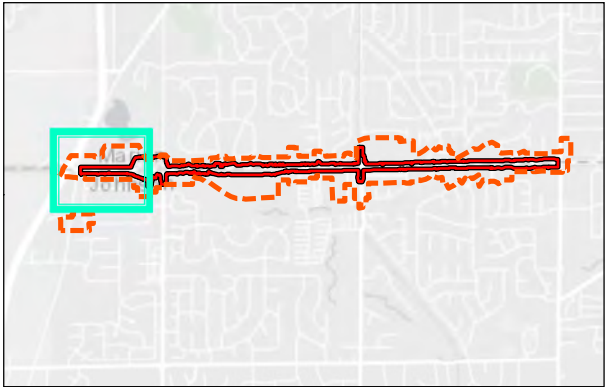
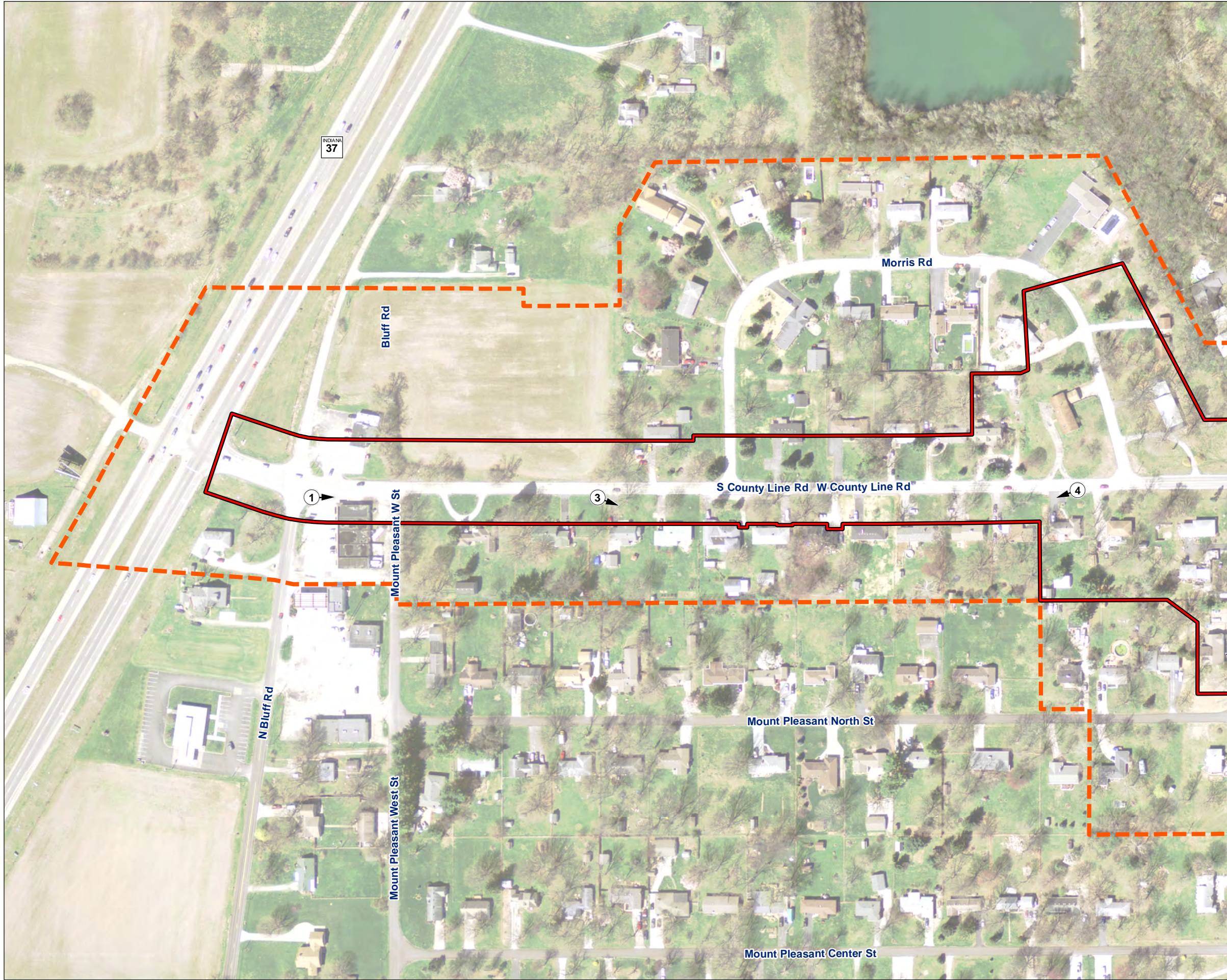





Photo Key **Sheet 1 of 7**

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



-  Project area
-  APE
-  Photograph location

Base: Aerial photograph
2016

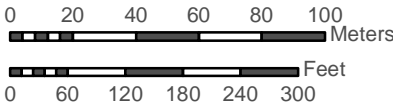
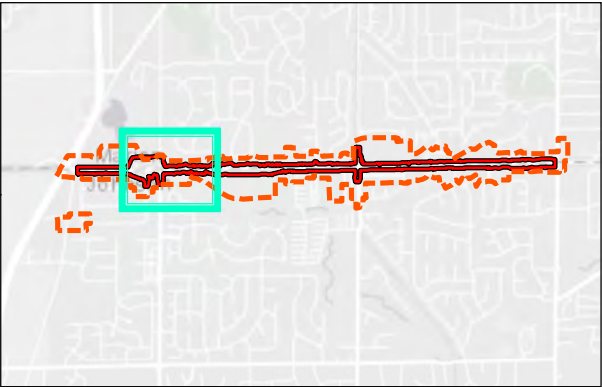
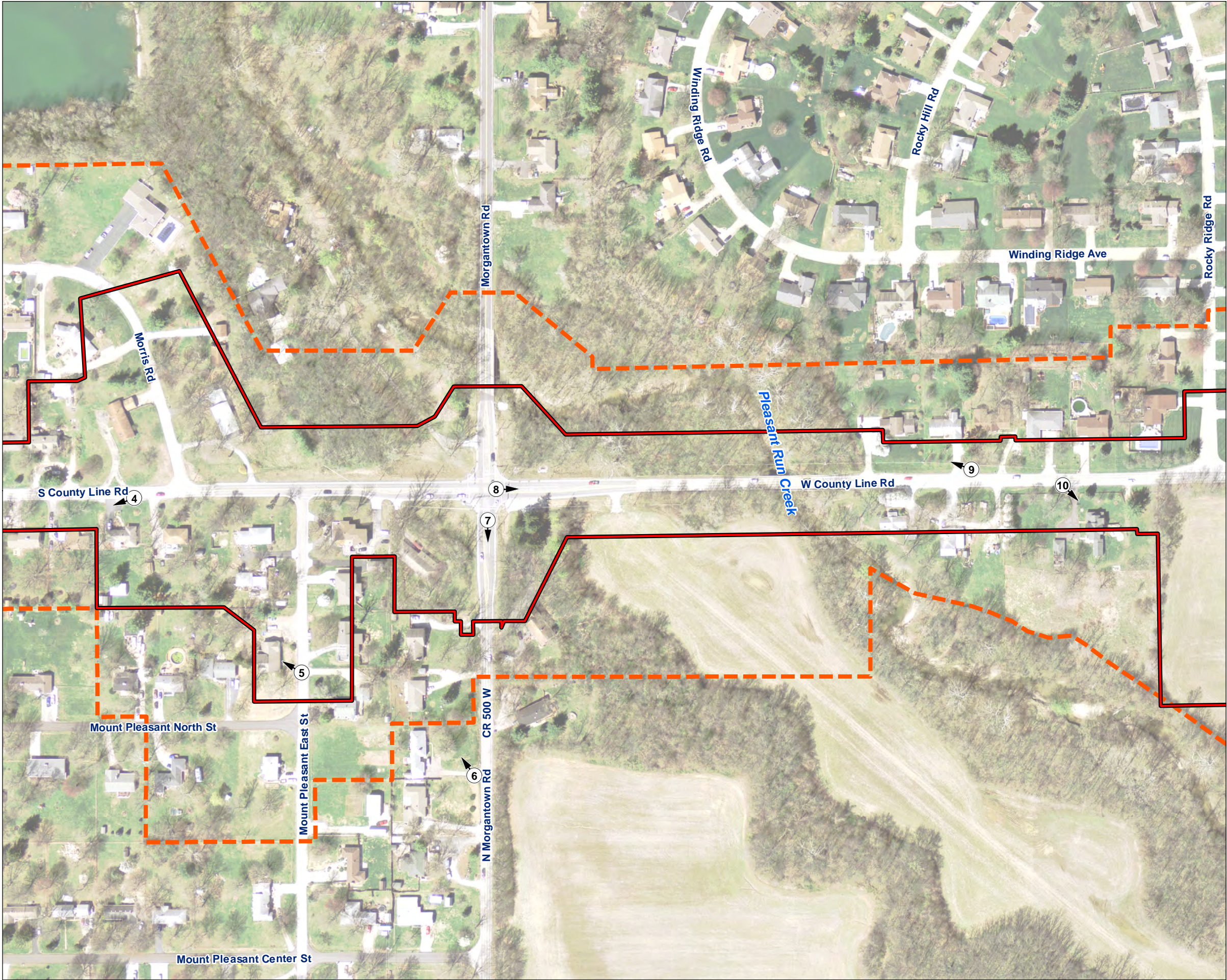


Photo Key

Sheet 2 of 7

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



- Project area
- APE
- Photograph location

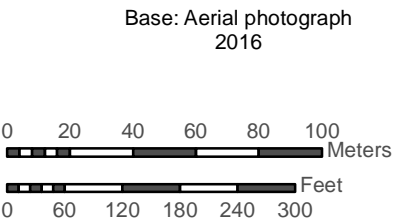
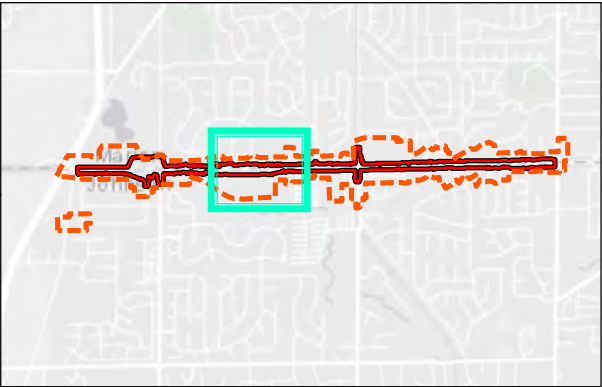
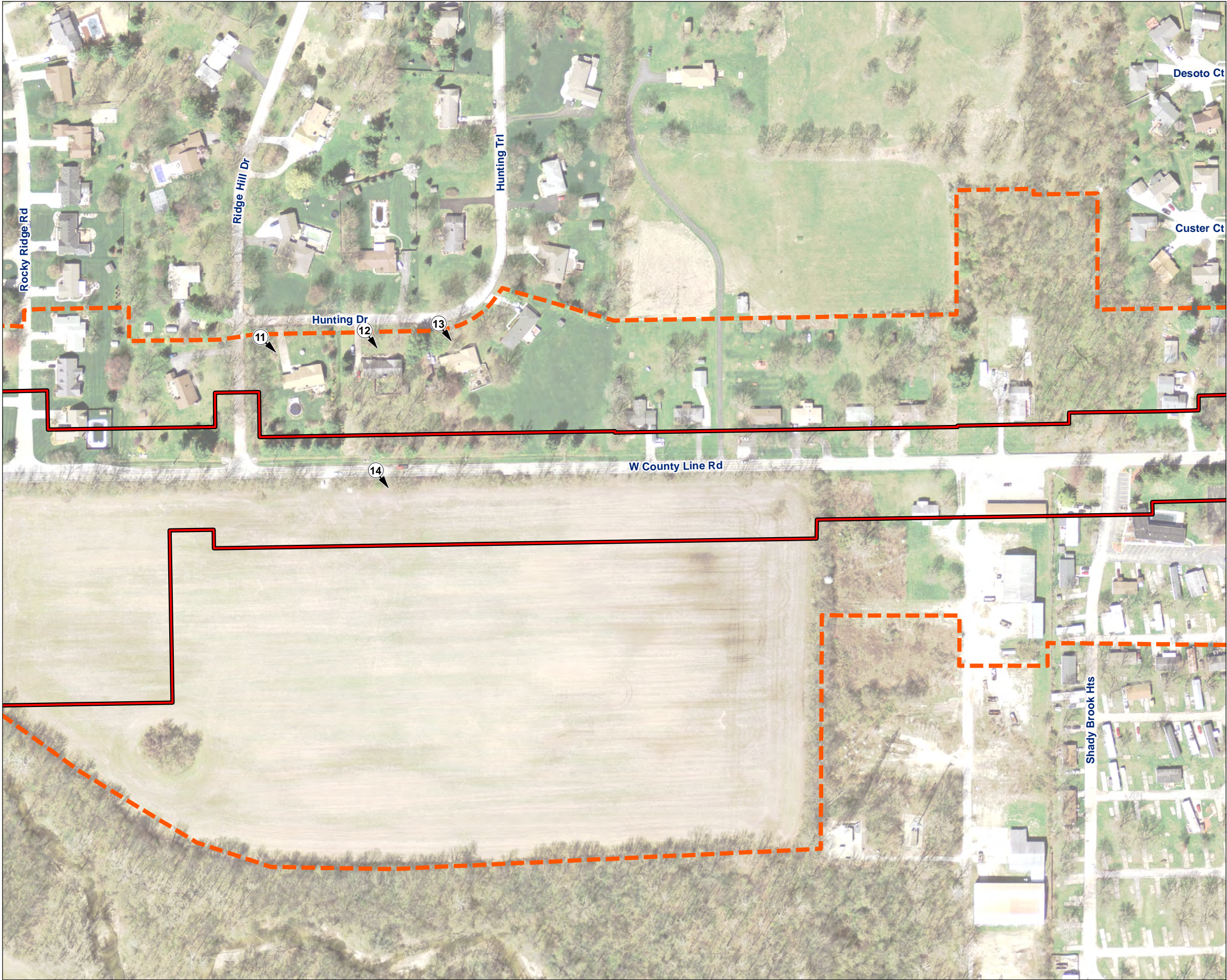


Photo Key **Sheet 3 of 7**

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



- Project area
- APE
- Photograph location

Base: Aerial photograph
2016

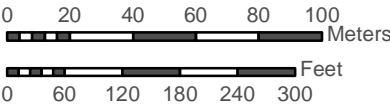
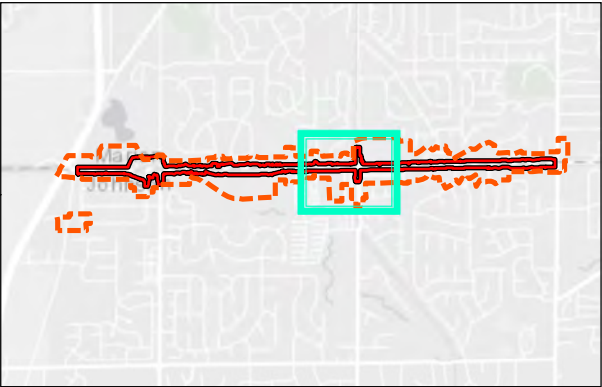
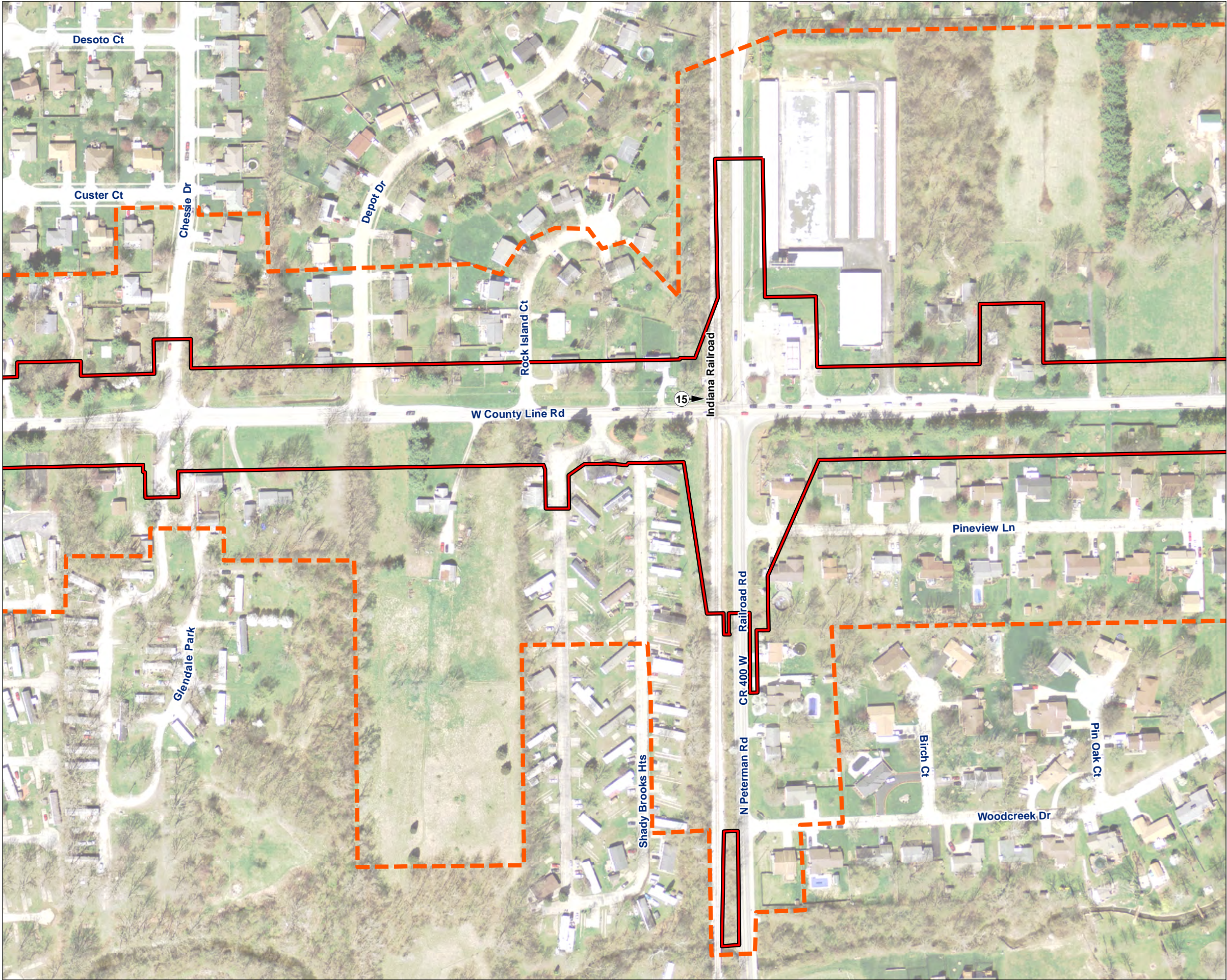


Photo Key **Sheet 4 of 7**

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



- Project area
- APE
- Photograph location

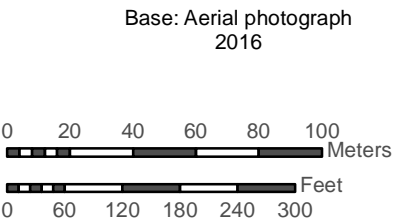
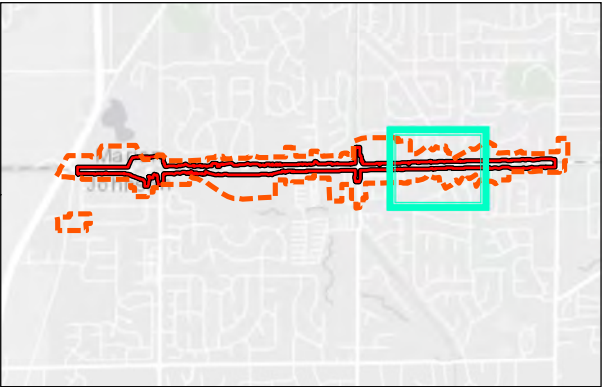
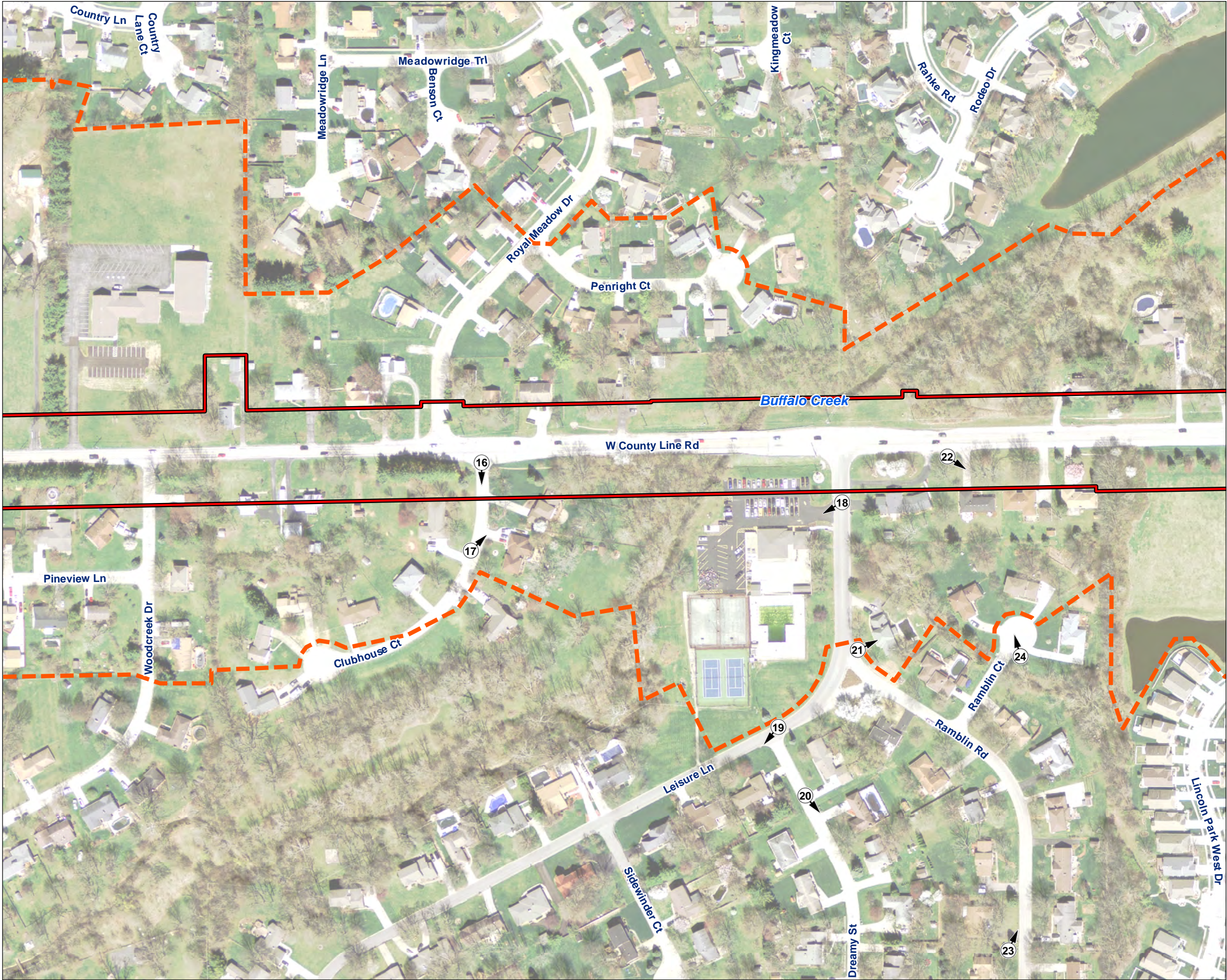


Photo Key **Sheet 5 of 7**

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



- Project area
- APE
- Photograph location

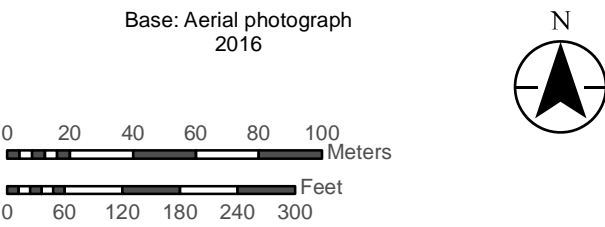
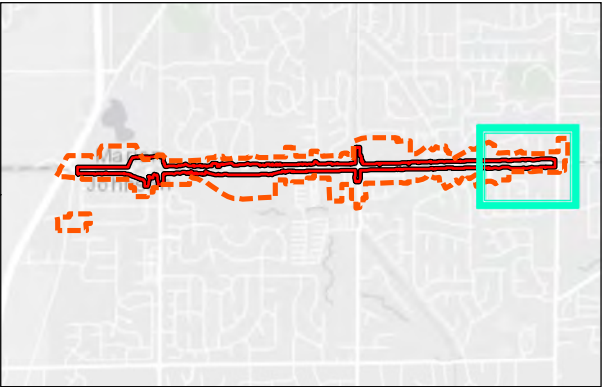
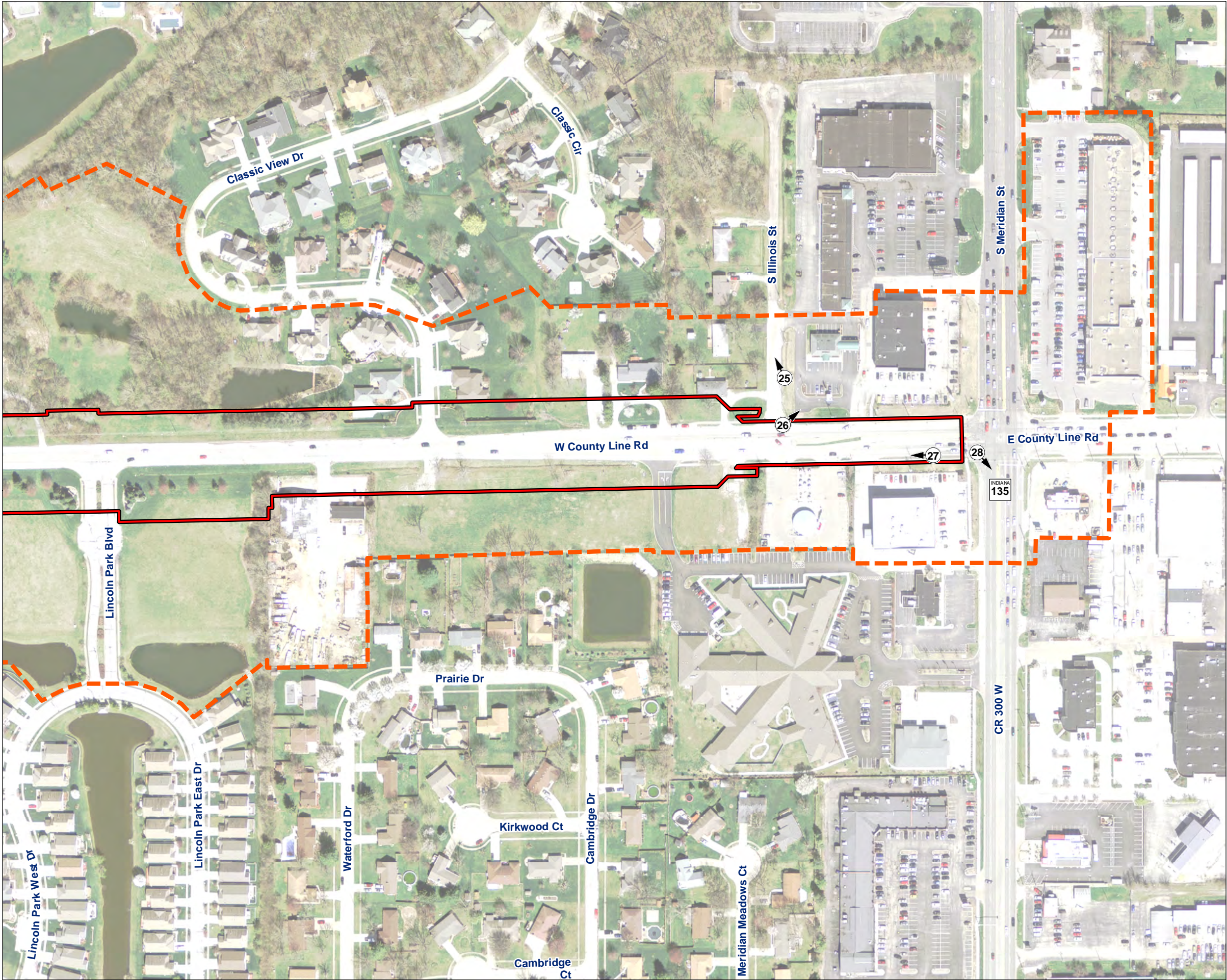


Photo Key **Sheet 6 of 7**

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



- Project area
- APE
- Photograph location

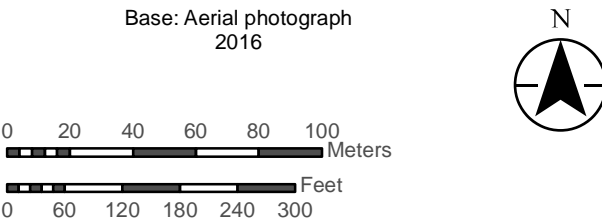


Photo Key

Aerial photograph showing the project area, APE, and photograph locations for the County Line Road Added Travel Lanes Project (Des. No. 2002553). (7 Sheets)



Photograph 1. View looking east and showing County Line Road east of Bluff Road at the western end of the APE.



Photograph 2. View looking northwest and showing John Sutton House at 988 N. Bluff Road.



Photograph 3. View looking southeast and showing typical houses along County Line Road in the Richards and Landers Mount Pleasant Subdivision.



Photograph 4. View looking southwest and showing typical houses along County Line Road in the Richards and Landers Mount Pleasant Subdivision.



Photograph 5. View looking northwest and showing a typical house (1278 Mount Pleasant East Road) along Mount Pleasant East Road in the Richards and Landers Mount Pleasant Subdivision.



Photograph 6. View looking northwest and showing typical houses along Morgantown Road in the Richards and Landers Mount Pleasant Subdivision.



Photograph 7. View looking south and showing Morgantown Road south of County Line Road.



Photograph 8. View looking east and showing County Line Road east of Morgantown Road.



Photograph 9. View looking northwest and showing typical houses (1908 and 1920 County Line Road) along County Line Road.



Photograph 10. View looking southeast and showing an enlarged and altered early twentieth century house (4811 County Line Road) along County Line Road.



Photograph 11. View looking southeast and showing 1635 Hunting Drive in Plat 1 of the Ridge Hill Trails Subdivision.



Photograph 12. View looking southeast and showing 1625 Hunting Drive in Plat 1 of the Ridge Hill Trails Subdivision.



Photograph 13. View looking southeast and showing 1615 Hunting Drive in Plat 1 of the Ridge Hill Trails Subdivision.



Photograph 14. View looking southeast and showing a remnant of the agricultural land that once lined County Line Road and now slated for residential development.



Photograph 15. View looking east and showing the intersection of County Line Road with the Indiana Railroad and Railroad Road/Peterman Road.



Photograph 16. View looking south and showing Clubhouse Court in Section 20 of the Carefree Subdivision (ca. 1978).



Photograph 17. View looking north-northeast and showing at typical house (3817 Clubhouse Court) in Section 20 of the Carefree Subdivision (ca. 1978).



Photograph 18. View looking southwest and showing the Carefree Club building (built 1971) in the Carefree Subdivision.



Photograph 19. View looking southwest and showing typical houses along Leisure Lane in the Carefree Subdivision.



Photograph 20. View looking southeast and showing typical houses along Dreamy Street in the Carefree Subdivision.



Photograph 21. View looking northeast of 1107 Leisure Lane in the Carefree Subdivision.



Photograph 22. View looking southeast and showing typical houses along County Line Road in the Carefree Subdivision.



Photograph 23. View looking northeast and showing typical houses along Ramblin Road in the Carefree Subdivision.



Photograph 24. View looking northwest and showing typical houses along Ramblin Court in the Carefree Subdivision.



Photograph 25. View looking northwest and showing typical houses along South Illinois Street in the Meridian Park Subdivision.



Photograph 26. View looking northeast and showing modern commercial development along West County Line Road in the Meridian Park Subdivision.



Photograph 27. View looking west along County Line Road from SR 135/Meridian Street.



Photograph 28. View looking southeast and showing modern commercial development around the intersection of County Line Road and SR 135/Meridian Street.

APPENDIX D: CONSULTING PARTIES LIST AND CORRESPONDENCE

**County Line Road Added Travel Lanes
Marion and Johnson Counties, Indiana
Des. No. 2002553, DPW Project ST-45-067
Section 106 Consulting Parties List (yellow
highlights indicate accepted Consulting
Party status)**

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Preservation Officer

Indiana DNR Division of Historic
Preservation and Archaeology
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Commissioners

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Barbara Lawrence, Marion County Board
of Commissioners

mytaxes@indy.gov

Julie Voorhies, Marion County Board of
Commissioners

auditorcustomerservice@indy.gov

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Indianapolis, IN 46204

Indianapolis Metropolitan Planning
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Sean Northup

Sean.northup@indympo.org

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Indianapolis Historic Preservation
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elizabeth.nowak@indy.gov

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Joe Hogsett, City of Indianapolis Mayor
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Ron West, District 3,

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mayor@greenwood.in.gov

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Daniel Johnston, Greenwood Community
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Greenwood, IN 46142

Dale C. Davis, AICP, Greenwood Planning
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Neil VanTrees, Johnson County Highway
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Calvin Nguyen, Indianapolis Preservation
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Indiana Landmarks Center
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Perry Township-Southport Historical Society
Keith Brown, President
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Indianapolis, IN 46227-4820

Johnson County Historian
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Greenwood, IN 46143-2424

Johnson County Historical Society and
Museum
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dpfeiffer@co.johnson.in.us
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Franklin, IN 46131-1720

Tribes

Eastern Shawnee Tribe of Oklahoma
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Pokagon Band of Potawatomi Indians
Shawnee Tribe
Delaware Tribe of Indians, Oklahoma



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-ES
Indianapolis, Indiana 46204

PHONE: (317) 296-0799

Eric Holcomb, Governor
Joe McGuinness, Commissioner

February 16, 2021

This letter was sent to the listed parties.

RE: County Line Road Added Travel Lanes, Marion and Johnson Counties (Des. No. 2002553; DPW Project ST-45-067)

Dear Consulting Party (see attached list),

The City of Indianapolis, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553). ASC Group, Inc. is under contract with HNTB, which is under contract with the City of Indianapolis, to advance the environmental documentation for the referenced project.

This letter is part of the early coordination phase of the environmental review process requesting comments associated with this project. We are requesting comments from you in your area of expertise regarding any possible environmental effects associated with this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

The proposed undertaking is on County Line Road, and begins 0.30 mile west of Morgantown Road and extends east to SR 135/Meridian Street in Marion and Johnson counties, Indiana. It is within Wayne Township, Maywood USGS Topographic Quadrangle, in Sections 21, 22, 23, 26, 27, and 28, Township 14 North, Range 3 East.

County Line Road is classified as a two-lane primary arterial roadway through the majority of the project corridor. The road expands to five lanes (two lanes in each direction with a turning lane to Meridian Street) between South Illinois Street and SR 135. The majority of the project area does not have pedestrian facilities, curb and gutter, or shoulders. Sidewalks, curb and gutter, and shoulders are only associated with the five lane section of County Line Road between South Illinois Street and Royal Meadow Drive.

There are two major intersections along County Line Road within the project limits: Morgantown Road and Railroad Road/Peterman Road. The Morgantown Road intersection is controlled by a traffic signal and has left turn lanes in all directions. There is a steep hill on County Line Road just west of this intersection, with an existing roadway grade of approximately 9 percent.

The Railroad Road/Peterman Road intersection is controlled by a 4-way stop sign, with a single approach lane from all four directions. The Indiana Railroad has a single-track rail line immediately adjacent to Railroad Road/Peterman Road, with an at-grade crossing of County Line Road less than 50 feet west of the intersection. The crossing has overhead flashers but no gates.

The existing structure over Pleasant Creek Run (Structure No. 49-4503F) is approximately 650 feet east of the Morgantown Road intersection. It is a 3-span concrete box beam bridge approximately 135 feet in length. The second existing structure over Buffalo Creek (Structure No. 49-4510F) is located just west of Leisure Lane on County Line Road. It is a 3-span reinforced concrete slab approximately 81 feet in length.

The proposed project includes County Line Road being expanded to a five-lane road (two 11 foot lanes in each direction and a 13 foot two-way left turn lane) with a 10-foot multi-purpose trail on the north side, 6-foot grass buffers on either side and a 6-foot sidewalk on the south side of the roadway. The two existing bridges will also be replaced to accommodate the additional travel lanes. The proposed bridge structures will accommodate the proposed roadway with the only modification to the typical section being that the grass buffers will be 2 feet per side within the bridge structure limits. The project will also construct stormwater detention, enclosed stormwater system, and address the sharp vertical curve at Morgantown Road.

The purpose of the South County Line Road project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor. The need for this project is the existing and future capacity restrictions as the projected traffic demands will exceed the capacity of the existing two-lane configuration. Additionally, there are no pedestrian or bicycle facilities associated with the existing roadway which is in a high density residential area.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. In accordance with 36 CFR 800.2 (c), you are hereby requested to be a consulting party to participate in the Section 106 process. Entities that have been invited to participate in the Section 106 consultation process for this project are identified in the attached list. Per 36 CFR 800.3(f), we hereby request that the Indiana State Historic Preservation Officer (SHPO) notify this office if the SHPO staff is aware of any other parties that may be entitled to be consulting parties or should be contacted as potential consulting parties for the project.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. At this time, no cultural resource investigations have occurred; however, the results of cultural resource identification and evaluation efforts, both above-ground and archaeological, will be forthcoming. Consulting parties will receive notification when these reports are completed.

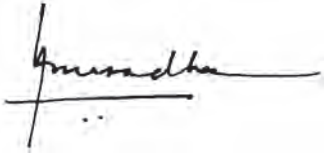
Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party, or if you do not respond, you will not be included on the list of consulting parties for this project. If we do not receive your response in the time allotted, the project will proceed consistent with the proposed design and you will not receive further information about the project unless the design changes. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

For questions concerning specific project details, you may contact Leah J. Konicki of ASC Group, Inc. at 317-915-9300, ext. 103, or lkonicki@ascgroup.net. All future responses regarding the proposed project should be forwarded to ASC Group, Inc. at the following address:

Leah J. Konicki
Principal Investigator – Architectural Historian
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, IN 46256
lkonicki@ascgroup.net

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Sincerely,



Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

Topographic map showing project area

Distribution List:

Beth K. McCord, Deputy State Historic Preservation Officer
Joseph O'Connor, Marion County Board of Commissioners, assessor@indy.gov
Barbara Lawrence, Marion County Board of Commissioners, mytaxes@indy.gov
Julie Voorhies, Marion County Board of Commissioners, auditorcustomerservice@indy.gov
Anna Gremling, Indianapolis Metropolitan Planning Organization, Anna.gremling@indympo.org
Sean Northup, Indianapolis Metropolitan Planning Organization, Sean.northup@indympo.org
Indianapolis Department of Metropolitan Development, DMDCommunications@indy.gov
Dan Parker, Indianapolis Department of Public Works, Daniel.Parker@indy.gov
Elizabeth Nowak, Indianapolis Historic Preservation Commission, elizabeth.nowak@indy.gov
Joe Hogsett, Mayor, City of Indianapolis
Brian Baird, Johnson County Commissioner, District 1, bbaird@co.johnson.in.us
Kevin Walls, Johnson County Commissioner, District 2, kwalls@co.johnson.in.us
Ron West, Johnson County Commissioner, District 3, rwest@co.johnson.in.us
James Ison, Johnson County Council, District 4, jison@co.johnson.in.us
Mark Myers, Greenwood Mayor, mayor@greenwood.in.gov
Daniel Johnston, Greenwood Community Development Services, johnstond@greenwood.in.gov
Dale C. Davis, AICP, Greenwood Planning Director, davisd@greenwood.in.gov
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Neil VanTrees, Johnson County Highway Department, lmastin@co.johnson.in.us
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Chad Lethig, Indiana Landmarks, Central Regional Office, clethig@indianalandmarks.org
Steven Barnett, Marion County Historian, srbarnett44@yahoo.com
Carol A. Hall, President, Marion County Historical Society

Keith Brown, President, Perry Township-Southport Historical Society
Max Fitzpatrick, Johnson County Historian, maxlois@sbcglobal.net
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Eastern Shawnee Tribe of Oklahoma
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Pokagon Band of Potawatomi Indians
Shawnee Tribe
Delaware Tribe of Indians, Oklahoma

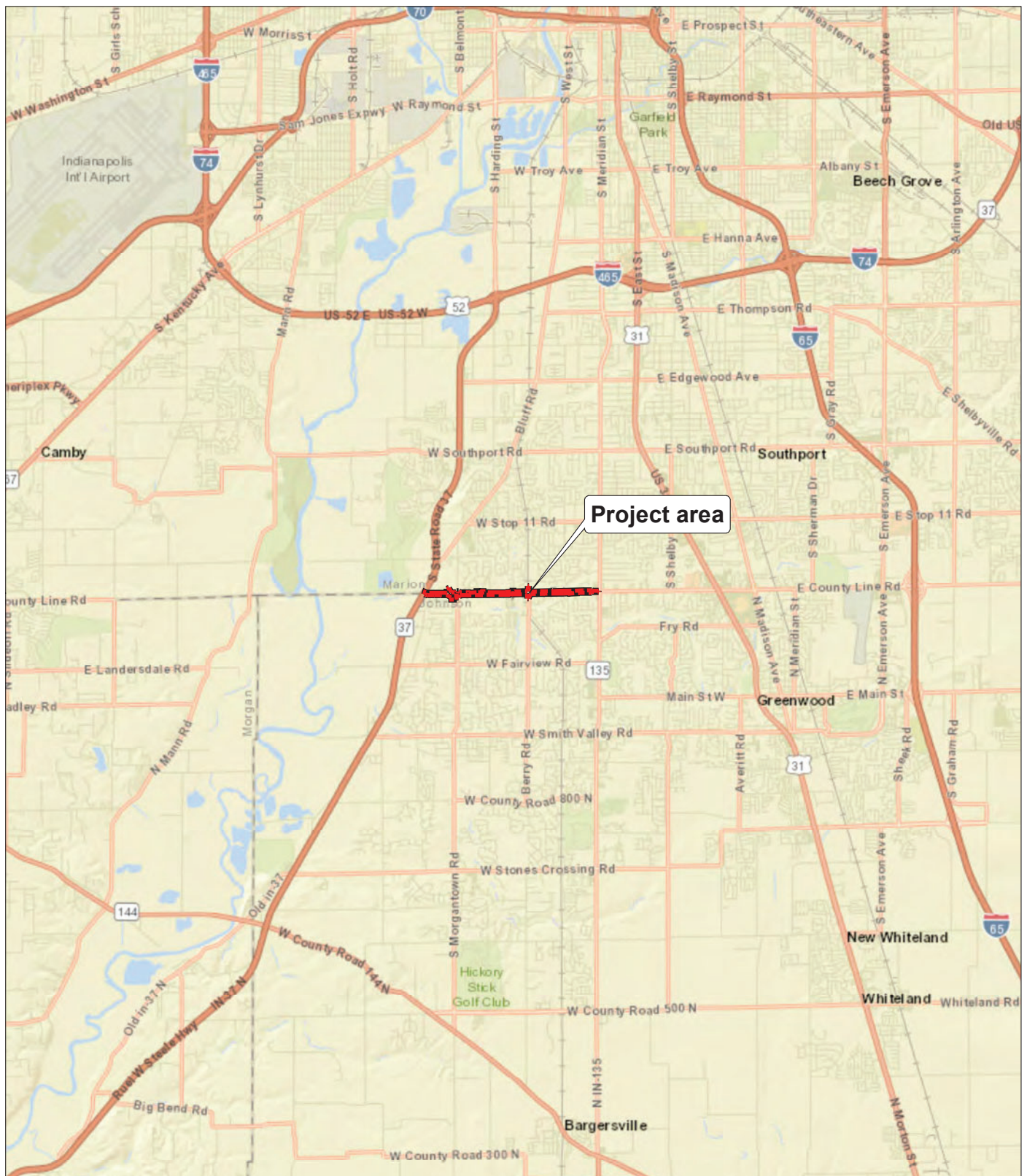


Figure 1

Portion of the ESRI World Street Map showing the vicinity of the project area.

Base: ESRI World Street Map

**County Line Road Added Travel Lanes
Marion and Johnson Counties, Indiana
Des. No. 2002553, DPW Project ST-45-067
Section 106 Consulting Parties List**

Beth K. McCord, Deputy State Historic
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Barbara Lawrence, Marion County Board of
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Tribes

Eastern Shawnee Tribe of Oklahoma
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Pokagon Band of Potawatomi Indians
Shawnee Tribe
Delaware Tribe of Indians, Oklahoma

From: [Leah Konicki](#)
To: ["BMccord@dnr.IN.gov"](#); ["assessor@indy.gov"](#); ["mytaxes@indy.gov"](#); ["auditorcustomerservice@indy.gov"](#); ["Anna.gremling@indympo.org"](#); ["Sean.northup@indympo.org"](#); ["DMDCommunications@indy.gov"](#); ["Daniel.Parker@indy.gov"](#); ["elizabeth.nowak@indy.gov"](#); ["bbaird@co.johnson.in.us"](#); ["kwalls@co.johnson.in.us"](#); ["rwest@co.johnson.in.us"](#); ["jison@co.johnson.in.us"](#); ["mayor@greenwood.in.gov"](#); ["johnstond@greenwood.in.gov"](#); ["davisd@greenwood.in.gov"](#); ["planning@co.johnson.in.us"](#); ["lmastin@co.johnson.in.us"](#); ["lmastin@co.johnson.in.us"](#); ["jbiggs@indianalandmarks.org"](#); ["clethig@indianalandmarks.org"](#); ["srbarnett44@yahoo.com"](#); ["maxlois@sbcglobal.net"](#); ["dpfeiffer@co.johnson.in.us"](#)
Cc: ["Christine Meador"](#); [Chris Schultz](#); [Adin McCann](#); [Harry Nikides](#); [Carpenter, Patrick A](#); ["Branigin, Susan"](#); ["Ross, Anthony"](#); ["Miller, Shaun \(INDOT\)"](#); ["erika.miller@indy.gov"](#)
Subject: FHWA Project: Des. No. 2002553; ECL, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Tuesday, February 16, 2021 4:00:12 PM
Attachments: [County Line Rd ATL DN 2002553 ECL.PDF](#)

Des. No.: 2002553, DPW Project ST-45-067

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties, Indiana

The City of Indianapolis, with funding from the Federal Highway Administration and administrative oversight from the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067).

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. The following agencies/individuals are being invited to become consulting parties:

Beth K. McCord, Deputy State Historic Preservation Officer
Joseph O'Connor, Marion County Board of Commissioners, [assessor@indy.gov](#)
Barbara Lawrence, Marion County Board of Commissioners, [mytaxes@indy.gov](#)
Julie Voorhies, Marion County Board of Commissioners, [auditorcustomerservice@indy.gov](#)
Anna Gremling, Indianapolis Metropolitan Planning Organization, [Anna.gremling@indympo.org](#)
Sean Northup, Indianapolis Metropolitan Planning Organization, [Sean.northup@indympo.org](#)
Indianapolis Department of Metropolitan Development, [DMDCommunications@indy.gov](#)
Dan Parker, Indianapolis Department of Public Works, [Daniel.Parker@indy.gov](#)
Elizabeth Nowak, Indianapolis Historic Preservation Commission, [elizabeth.nowak@indy.gov](#)
Joe Hogsett, Mayor, City of Indianapolis
Brian Baird, Johnson County Commissioner, District 1, [bbaird@co.johnson.in.us](#)
Kevin Walls, Johnson County Commissioner, District 2, [kwalls@co.johnson.in.us](#)
Ron West, Johnson County Commissioner, District 3, [rwest@co.johnson.in.us](#)
James Ison, Johnson County Council, District 4, [jison@co.johnson.in.us](#)
Mark Myers, Greenwood Mayor, [mayor@greenwood.in.gov](#)
Daniel Johnston, Greenwood Community Development Services, [johnstond@greenwood.in.gov](#)
Dale C. Davis, AICP, Greenwood Planning Director, [davisd@greenwood.in.gov](#)
Dave Hittle, Johnson County Planning and Zoning, [planning@co.johnson.in.us](#)
Luke Mastin, Johnson County Highway Department, [lmastin@co.johnson.in.us](#)
Neil VanTrees, Johnson County Highway Department, [lmastin@co.johnson.in.us](#)
Joshua Biggs, Indiana Landmarks, Central Regional Office, [jbiggs@indianalandmarks.org](#)
Chad Lethig, Indiana Landmarks, Central Regional Office, [clethig@indianalandmarks.org](#)
Steven Barnett, Marion County Historian, [srbarnett44@yahoo.com](#)
Carol A. Hall, President, Marion County Historical Society
Keith Brown, President, Perry Township-Southport Historical Society
Max Fitzpatrick, Johnson County Historian, [maxlois@sbcglobal.net](#)
David Pfeiffer, Director, Johnson County Historical Society and Museum, [dpfeiffer@co.johnson.in.us](#)

Eastern Shawnee Tribe of Oklahoma
Miami Tribe of Oklahoma
Peoria Tribe of Indians of Oklahoma
Pokagon Band of Potawatomi Indians
Shawnee Tribe
Delaware Tribe of Indians, Oklahoma

This letter is part of the early coordination phase of the environmental review process requesting comments associated with this project. We are requesting comments from you in your area of expertise regarding any possible environmental effects associated with this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

Please review the attached letter, which is also located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE), and respond with your comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If a hard copy of the materials is needed, please respond to this email with your request as soon as you can.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comments. If we do not receive a response from an invited consulting party within the time allotted, the project will proceed consistent with the proposed design. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.
Thank you in advance for your input,

Leah J. Konicki
Project Manager/Principal Investigator - Architectural Historian

ASC Group, Inc.

9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300 ext. 103 (office)
317.565.9100 (cell)

[Facebook](#) | [LinkedIn](#) | [Web](#)



From: [Miller, Shaun \(INDOT\)](#)
To: [thpo@estoo.net](#); [Diane Hunter](#); [lpappenfort@peoriatribe.com](#); [matthew.bussler@pokagonband-nsn.gov](#); [tonya@shawnee-tribe.com](#); [lheady@delawaretribe.org](#)
Cc: [Leah Konicki](#); [Ross, Anthony](#); [Carpenter, Patrick A](#)
Subject: FW: FHWA Project: Des. No. 2002553; ECL, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Wednesday, February 17, 2021 7:53:34 AM
Attachments: [County Line Rd ATL DN 2002553 ECL.PDF](#)

Des. No.: 2002553, DPW Project ST-45-067

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties, Indiana

The City of Indianapolis, with funding from the Federal Highway Administration and administrative oversight from the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067).

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Joseph O'Connor, Marion County Board of Commissioners, assessor@indy.gov
Barbara Lawrence, Marion County Board of Commissioners, mytaxes@indy.gov
Julie Voorhies, Marion County Board of Commissioners, auditorcustomerservice@indy.gov
Anna Gremling, Indianapolis Metropolitan Planning Organization, Anna.gremling@indympo.org
Sean Northup, Indianapolis Metropolitan Planning Organization, Sean.northup@indympo.org
Indianapolis Department of Metropolitan Development, DMDCommunications@indy.gov
Dan Parker, Indianapolis Department of Public Works, Daniel.Parker@indy.gov
Elizabeth Nowak, Indianapolis Historic Preservation Commission, elizabeth.nowak@indy.gov
Joe Hogsett, Mayor, City of Indianapolis
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Ron West, Johnson County Commissioner, District 3, rwest@co.johnson.in.us
James Ison, Johnson County Council, District 4, jison@co.johnson.in.us
Mark Myers, Greenwood Mayor, mayor@greenwood.in.gov
Daniel Johnston, Greenwood Community Development Services, johnstond@greenwood.in.gov
Dale C. Davis, AICP, Greenwood Planning Director, david@d@greenwood.in.gov
Dave Hittle, Johnson County Planning and Zoning, planning@co.johnson.in.us
Luke Mastin, Johnson County Highway Department, lmastin@co.johnson.in.us
Neil VanTrees, Johnson County Highway Department, lmastin@co.johnson.in.us
Joshua Biggs, Indiana Landmarks, Central Regional Office, jbiggs@indianalandmarks.org
Chad Lethig, Indiana Landmarks, Central Regional Office, clethig@indianalandmarks.org
Steven Barnett, Marion County Historian, srbarnett44@yahoo.com
Carol A. Hall, President, Marion County Historical Society
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Eastern Shawnee Tribe of Oklahoma
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Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Shaun Miller
INDOT, Cultural Resources Office
Archaeology Team Lead
(317)416-0876

From: [Joshua Biggs](#)
To: [Leah Konicki](#)
Cc: [Mark Dollase](#); [Chad Lethig](#)
Subject: RE: FHWA Project: Des. No. 2002553; ECL, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Tuesday, February 16, 2021 7:23:36 PM
Attachments: [Des. No 2002553 - Early Coordination Response.pdf](#)

Good evening, Ms. Konicki:

Thank you for your email. Indiana Landmarks agrees to be a consulting party project (see attached letter). We look forward to working with you on this project.

Best regards,

.....
Joshua Biggs
Community Preservation Specialist

.....
Indiana Landmarks
1201 Central Avenue
Indianapolis, IN 46202
Ph. 317-822-7908, 800-450-4534
Fax: 317-639-6734
www.indianalandmarks.org

Indiana Landmarks revitalizes communities, reconnects us to our heritage, and saves meaningful places.

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From: Leah Konicki <lkonicki@ascgroup.net>
Sent: Tuesday, February 16, 2021 4:00 PM
To: 'BMccord@dnr.IN.gov' <BMccord@dnr.IN.gov>; 'assessor@indy.gov' <assessor@indy.gov>; 'mytaxes@indy.gov' <mytaxes@indy.gov>; 'auditorcustomerservice@indy.gov' <auditorcustomerservice@indy.gov>; 'Anna.gremling@indympo.org' <Anna.gremling@indympo.org>; 'Sean.northup@indympo.org' <Sean.northup@indympo.org>; 'DMDCcommunications@indy.gov' <DMDCcommunications@indy.gov>; 'Daniel.Parker@indy.gov' <Daniel.Parker@indy.gov>; 'elizabeth.nowak@indy.gov' <elizabeth.nowak@indy.gov>; 'bbaird@co.johnson.in.us' <bbaird@co.johnson.in.us>; 'kwalls@co.johnson.in.us' <kwalls@co.johnson.in.us>; 'rwest@co.johnson.in.us' <rwest@co.johnson.in.us>; 'jison@co.johnson.in.us' <jison@co.johnson.in.us>; 'mayor@greenwood.in.gov' <mayor@greenwood.in.gov>; 'johnstond@greenwood.in.gov' <johnstond@greenwood.in.gov>; 'david@greenwood.in.gov' <david@greenwood.in.gov>; 'planning@co.johnson.in.us' <planning@co.johnson.in.us>; 'lmastin@co.johnson.in.us' <lmastin@co.johnson.in.us>; 'lmastin@co.johnson.in.us' <lmastin@co.johnson.in.us>; Joshua Biggs <jbiggs@indianalandmarks.org>; Chad Lethig <CLethig@indianalandmarks.org>; 'srbarnett44@yahoo.com' <srbarnett44@yahoo.com>; 'maxlois@sbcglobal.net' <maxlois@sbcglobal.net>; 'dpfeiffer@co.johnson.in.us' <dpfeiffer@co.johnson.in.us>
Cc: 'Christine Meador' <CMeador@HNTB.com>; Chris Schultz <cjschultz@HNTB.com>; Adin McCann

February 16, 2021

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

RE: County Line Road Added Travel Lanes, Marion and Johnson Counties (Des. No. 2002553; DPW
Project ST-45-067)

Dear Ms. Konicki:

Thank you for the opportunity to comment on the above undertaking. Indiana Landmarks agrees to be a consulting party for this project.

We have reviewed the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) to learn more about historic resources in the area that may be affected by this project. While we did not locate any previously surveyed historic resources within the proposed project area, we do wish to bring to your attention an unsurveyed single-family residence, located at 3827 W. County Line Rd., Greenwood, IN 46142. This brick Tudor Revival residence was built in 1930 (according to Johnson County records) and retains a great deal of historic integrity. We believe this structure may have enough significance to be eligible for the National Register of Historic Places.

We appreciate your consideration and will look forward to remaining involved in the Section 106 process for this project.

Sincerely,



Joshua Biggs
Community Preservation Specialist

Division of Historic Preservation & Archaeology · 402 W. Washington Street, W274 · Indianapolis, IN 46204-2739
Phone 317-232-1646 · Fax 317-232-0693 · dhpa@dnr.IN.gov · www.IN.gov/dnr/historic



February 25, 2021

Leah J. Konicki
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: Early coordination letter 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 February 16, 2021 submission which enclosed INDOT's early coordination letter, received by our office the same day for this project in Marion and Johnson counties.

We are not aware of any parties who should be invited to participate in the Section 106 consultation on this federal undertaking, beyond those whom INDOT already has invited. However, if right-of-way is likely to be taken from a potentially historic property, it might be advisable to invite the owner of that property as soon as possible. In your next regular correspondence on this project, please advise us as to which of the invited consulting parties has accepted the invitation.

We look forward to reviewing the proposed area of potential effects and the reports on investigations of above-ground cultural resources and archaeological resources that the early coordination letter indicated will be forthcoming.

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. 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,

A handwritten signature in black ink, appearing to read "Beth K. McCord".

Beth K. McCord
Deputy State Historic Preservation Officer

BKM:DMK:dmk

Leah J. Konicki
February 25, 2021
Page 2

emc: Anuradha Kumar, INDOT
Shaun Miller, INDOT
Susan Branigin, INDOT
Anthony Ross, INDOT
Leah J. Konicki, ASC Group, Inc.
Beth McCord, DNR-DHPA
Danielle Kauffmann, DNR-DHPA



Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
www.miamination.com



Via email: smiller@indot.in.gov

March 18, 2021

Shaun Miller
Archaeological Team Lead, Cultural Resources Office
Indiana DOT
575 North Pennsylvania Street
Indianapolis, IN 46204

Re: Des. No. 2002553; County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana – Comments of the Miami Tribe of Oklahoma

Dear Mr. Miller:

Aya, kikwehsitoole – I show you respect. The Miami Tribe of Oklahoma, a federally recognized Indian tribe with a Constitution ratified in 1939 under the Oklahoma Indian Welfare Act of 1936, respectfully submits the following comments regarding Des. No. 2002553.

The Miami Tribe offers no objection to the above-referenced project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, given the Miami Tribe's deep and enduring relationship to its historic lands and cultural property within present-day Indiana, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966 or by email at dhunter@miamination.com to initiate consultation.

The Miami Tribe accepts the invitation to serve as a consulting party to the proposed project. In my capacity as Tribal Historic Preservation Officer, I am the point of contact for consultation.

Respectfully,

Diane Hunter
Tribal Historic Preservation Officer



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-ES
Indianapolis, Indiana 46204

PHONE: (317) 296-0799

Eric Holcomb, Governor
Joe McGuinness, Commissioner

June 3, 2021

This letter was sent to the listed parties.

RE: County Line Road Added Travel Lanes, Marion and Johnson Counties (Des. No. 2002553; DPW Project ST-45-067; DHPA No. 27053)

Dear Consulting Party (see attached list),

The City of Indianapolis Department of Public Works, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067).

This letter is part of the Section 106 review process for this project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. We are requesting comments from you regarding the possible effects of this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

A Section 106 early coordination letter was distributed on February 16, 2021.

The proposed undertaking is on County Line Road, and begins 0.30 mile west of Morgantown Road and extends east to SR 135/Meridian Street in Marion and Johnson counties, Indiana. It is within Wayne Township, Maywood USGS Topographic Quadrangle, in Sections 21, 22, 23, 26, 27, and 28, Township 14 North, Range 3 East.

County Line Road is classified as a two-lane primary arterial roadway through the majority of the project corridor. The road expands to five lanes (two lanes in each direction with a turning lane to Meridian Street) between South Illinois Street and SR 135. The majority of the project area does not have pedestrian facilities, curb and gutter, or shoulders. Sidewalks, curb and gutter, and shoulders are only associated with the five lane section of County Line Road between South Illinois Street and Royal Meadow Drive.

There are two major intersections along County Line Road within the project limits: Morgantown Road and Railroad Road/Peterman Road. The Morgantown Road intersection is controlled by a traffic signal and has left turn lanes in all directions. There is a steep hill on County Line Road just west of this intersection, with an existing roadway grade of approximately 9 percent.

The Railroad Road/Peterman Road intersection is controlled by a 4-way stop sign, with a single approach lane from all four directions. The Indiana Railroad has a single-track rail line immediately adjacent to Railroad Road/Peterman Road, with an at-grade crossing of County Line Road less than 50 feet west of the intersection. The crossing has overhead flashers but no gates.

The existing structure over Pleasant Creek Run (Structure No. 49-4503F) is approximately 650 feet east of the Morgantown Road intersection. It is a 3-span concrete box beam bridge approximately 135 feet in length. The second existing structure over Buffalo Creek (Structure No. 49-4510F) is located just west of Leisure Lane on County Line Road. It is a 3-span reinforced concrete slab approximately 81 feet in length.

The proposed project includes County Line Road being expanded to a five-lane road (two 11 foot lanes in each direction and a 13-foot two-way left turn lane) with a 10-foot multi-purpose trail on the north side, 6-foot concrete buffers on either side and a 6-foot sidewalk on the south side of the roadway. The two existing bridges will also be replaced to accommodate the additional travel lanes. The proposed bridge structures will accommodate the proposed roadway with the only modification to the typical section being that the concrete buffers will be 2 feet per side within the bridge structure limits. The project will also construct stormwater detention, enclosed stormwater system, and address the sharp vertical curve at Morgantown Road.

The purpose of the South County Line Road project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor. The need for this project is the existing and future capacity restrictions as the projected traffic demands will exceed the capacity of the existing two-lane configuration. Additionally, there are no pedestrian or bicycle facilities associated with the existing roadway which is in a high density residential area.

HNTB is under contract with the City of Indianapolis to advance the environmental documentation for the referenced project. ASC Group, Inc. has been subcontracted to complete the Section 106 documentation for the project.

In accordance with 36 CFR 800.2 (c), you were invited to become a consulting party as part of the Section 106 process, or you are hereby invited to become a consulting party as part of the Section 106 process. Entities that have previously accepted consulting party status – as well as additional entities that are currently being invited to become consulting parties – are identified in the attached list.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, to assess the undertaking's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE contains no resources listed in the National Register of Historic Places (NRHP).

A historian who meets the Secretary of the Interior's Professional Qualification Standards identified and evaluated above-ground resources within the APE for potential eligibility for the NRHP. As a result of the historic property identification and evaluation efforts for the project, no above-ground resources are recommended as eligible for listing in the NRHP.

With regard to archaeological resources, an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards identified six new archaeological sites within the project area. As a result of these efforts, sites 12-Ma-1075, 12-Ma-1076, 12-Ma-1077, 12-Ma-1078, 12-Jo-0736, and 12-Jo-0737 were

recommended as not eligible for listing in the NRHP. No further work is recommended provided that the project area does not change.

The Historic Property Report and Archaeology Report (Tribes only) are 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 these documents and to respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If you prefer a hard-copy of this material, please respond to this email with your request as soon as you can.

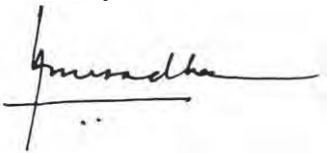
Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party or if you have not previously accepted consulting party status and you do not respond to this letter, you will not be included on the list of consulting parties for this project and will not receive further information about the project unless the design changes. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

For questions concerning specific project details, you may contact Leah J. Konicki of ASC Group, Inc. at 317-915-9300, ext. 103, or lkonicki@ascgroup.net. All future responses regarding the proposed project should be forwarded to ASC Group, Inc. at the following address:

Leah J. Konicki
Principal Investigator – Architectural Historian
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, IN 46256
lkonicki@ascgroup.net.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Sincerely,



Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Enclosures:

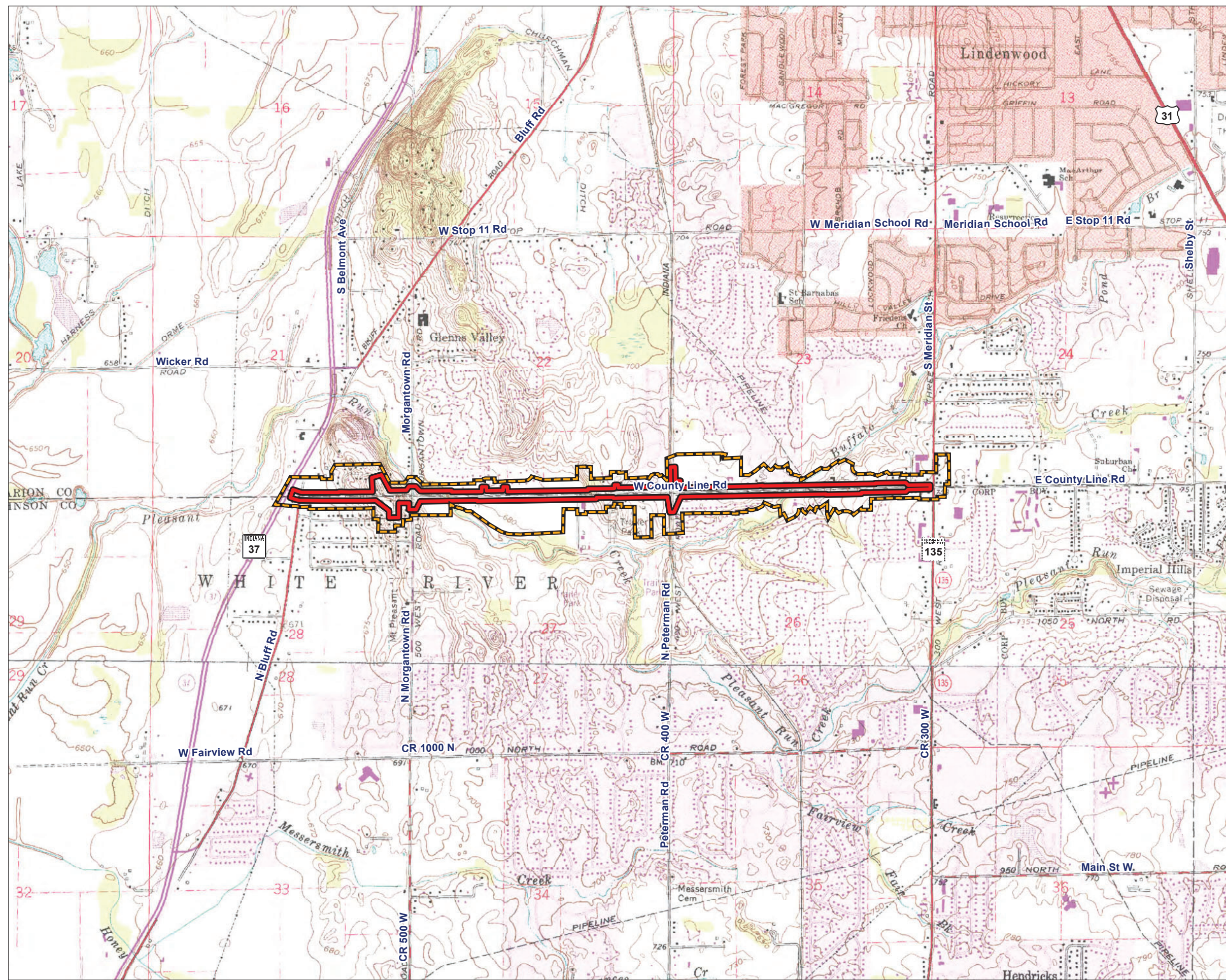
Topographic map showing project area

Distribution List:

Beth K. McCord, Deputy State Historic Preservation Officer

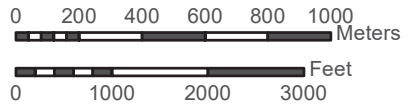
Joshua Biggs, Indiana Landmarks, Central Regional Office, jbiggs@indianalandmarks.org

Miami Tribe of Oklahoma



-  Project area
-  APE

Base: USGS Bargserville and Maywood, Indiana, 7.5' series quadrangles



Portions of the 1992 Bargserville and 1998 Maywood, Indiana quadrangles (USGS 7.5' topographic maps) showing the project area and APE for the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067).

From: [Leah Konicki](#)
To: ["BMccord@dnr.IN.gov"; "jbiggs@indianalandmarks.org"](#)
Cc: ["Christine Meador"; Adin McCann; Chris Schultz; Doug Terpstra; Carpenter, Patrick A; "Korzeniewski, Patricia J"; Miller, Shaun \(INDOT\); Branigin, Susan; Kumar, Anuradha; "ericka.miller@indy.gov"; Wallace, Jonathan N; Harry Nikides](#)
Subject: FHWA Project: Des. No. 2002553; HPR and Archaeology Report, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Friday, June 4, 2021 8:12:24 AM

Des. No.: 2002553, DPW Project ST-45-067

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties, Indiana

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067).

As part of Section 106 of the National Historic Preservation Act, a Historic Property Report and an Archaeology Report have been prepared and are ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (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 as soon as you can.

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Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Leah J. Konicki
Project Manager/Principal Investigator - Architectural Historian

ASC Group, Inc.

9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300 ext. 103 (office)
317.565.9100 (cell)

[Facebook](#) | [LinkedIn](#) | [Web](#)

From: [Korzeniewski, Patricia J](#)
To: [thpo@estoo.net](#); [Diane Hunter](#); [lpappenfort@peoriatribe.com](#); [matthew.bussler@pokagonband-nsn.gov](#); [tonya@shawnee-tribe.com](#); [epaden@delawarenation-nsn.gov](#); [lheady@delawaretribe.org](#)
Cc: [Miller, Shaun \(INDOT\)](#); [Korzeniewski, Patricia J](#); [Carmany-George, Karstin \(FHWA\)](#); [Carpenter, Patrick A](#); [Leah Konicki](#); [Ross, Anthony](#)
Subject: FHWA Project: Des. No. 2002553; HPR and Archaeology Report, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Friday, June 4, 2021 8:22:12 AM

Des. No.: 2002553, DPW Project ST-45-067

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties, Indiana

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067).

As part of Section 106 of the National Historic Preservation Act, a Historic Property Report and an Archaeology Report have been prepared and are ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (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 as soon as you can.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Patricia Jo Korzeniewski
Archaeologist and Environmental Manager
INDOT, Cultural Resources Office
100 North Senate Avenue, N758-ES
Indianapolis, Indiana 46204
PKorzeniewski@indot.in.gov
1-317-416-4377



July 6, 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 Glenns 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 newly identified archaeological sites 12Ma1077 and 12Ma1078 are eligible for inclusion in the NRHP. Sites 12Ma1077 and 12Ma1078 should be clearly marked and must be 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

BKM:DMK:PCD:dmk

emc: Anuradha Kumar, INDOT
Shaun Miller, INDOT
Susan Branigin, INDOT
Anthony Ross, INDOT
Leah J. Konicki, ASC Group, Inc.
Indiana Landmarks Central Regional Office
Miami Tribe of Oklahoma
Beth McCord, DNR-DHPA
Paul Diebold, DNR-DHPA
Danielle Kauffmann, DNR-DHPA



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 Glenns 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

BKM:DMK:PCD:dmk

emc: Anuradha Kumar, INDOT
Shaun Miller, INDOT
Susan Branigin, INDOT
Anthony Ross, INDOT
Leah J. Konicki, ASC Group, Inc.
Indiana Landmarks Central Regional Office
Miami Tribe of Oklahoma
Beth McCord, DNR-DHPA
Paul Diebold, DNR-DHPA
Danielle Kauffmann, DNR-DHPA



**EASTERN SHAWNEE
CULTURAL PRESERVATION DEPARTMENT**

70500 East 128 Road, Wyandotte, OK 74370

August 3, 2021

INDOT Indiana Department of Environmental Services
100 N. Senate Ave
Indianapolis, IN 46204

RE: DES. No. 2002553, DPW Project ST-45-067, Marion and Johnson County, Indiana

Dear Ms. Korzeniewski,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Marion and Johnson County, Indiana. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

Paul Barton, Tribal Historic Preservation Officer (THPO)
Eastern Shawnee Tribe of Oklahoma
(918) 666-5151 Ext:1833



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-ES
Indianapolis, Indiana 46204

PHONE: (317) 296-0799

Eric Holcomb, Governor
Joe McGuinness, Commissioner

November 23, 2021

This letter was sent to the listed parties.

RE: County Line Road Added Travel Lanes Project; HPR Addendum (Des. No. 2002553; DPW Project ST-45-067; DHPA Project 27053)

Dear Consulting Party,

The City of Indianapolis, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553).

This letter is part of the Section 106 review process for this project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. We are requesting comments from you regarding the possible effects of this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

A Section 106 early coordination letter was distributed on February 16, 2021. In addition, a letter distributed on June 3, 2021 notified consulting parties that a historic property report and an archaeology report were available for review and comment.

The proposed undertaking is on County Line Road, and begins 0.30 mile west of Morgantown Road and extends east to SR 135/Meridian Street in Marion and Johnson counties, Indiana. It is within Wayne Township, Maywood USGS Topographic Quadrangle, in Sections 21, 22, 23, 26, 27, and 28, Township 14 North, Range 3 East.

HNTB is under contract with the City of Indianapolis to advance the environmental documentation for the referenced project. ASC Group, Inc. has been subcontracted to complete the Section 106 documentation for the project.

In accordance with 36 CFR 800.2 (c), you were invited to become a consulting party as part of the Section 106 process, or you are hereby invited to become a consulting party as part of the Section 106 process. Entities that have previously accepted consulting party status--as well as additional entities that are currently being invited to become consulting parties--are identified in the attached list.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, to assess the undertaking's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory

Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE contains no resources listed in the National Register of Historic Places (NRHP).

In its response dated July 6, 2021 (Revised July 15, 2021), the Indiana State Historic Preservation Office (SHPO) stated that five subdivisions located within the APE for this project were eligible for the NRHP, stating, in part:

"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.

"In Marion County, we believe Ridge Hill Trails and Royal Meadows are eligible for the NRHP."

The Historic Property Report Addendum (HPR Addendum) is being submitted to provide SHPO with additional research and analysis following the *Residential Planning and Development in Indiana, 1940–1973 Multiple Property Documentation Form (MPDF)*. We would appreciate SHPO's reconsideration of these neighborhoods' eligibility based on this additional evaluation. Further, we would welcome the opportunity to meet with SHPO either on site in the neighborhoods or in a virtual meeting to aid in their review and the evaluation discussion.

In addition, this HPR Addendum addresses above-ground cultural resources in areas that have been added to the project footprint as a result of project refinements. One property within the additional APE, the John Sutton House at 988 N. Bluff Road, is recommended eligible for the NRHP.

The HPR Addendum 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 these documents and to respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If you prefer a hard-copy of this material, please respond to this email with your request as soon as you can.

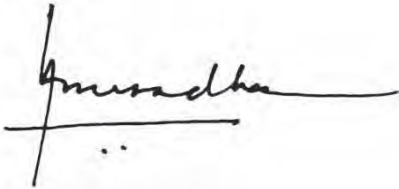
Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party or if you have not previously accepted consulting party status and you do not respond to this letter, you will not be included on the list of consulting parties for this project and will not receive further information about the project unless the design changes. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

For questions concerning specific project details, you may contact Leah J. Konicki of ASC Group, Inc. at 317-915-9300, ext. 103, or lkonicki@ascgroup.net. All future responses regarding the proposed project should be forwarded to ASC Group, Inc. at the following address:

Leah J. Konicki
Principal Investigator – Architectural Historian
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, IN 46256
lkonicki@ascgroup.net.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Sincerely,

A handwritten signature in black ink, appearing to read "Anuradha", with a horizontal line drawn underneath it.

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Distribution List:

Beth K. McCord, Deputy State Historic Preservation Officer
Joshua Biggs, Indiana Landmarks, Central Regional Office, jbiggs@indianalandmarks.org
Miami Tribe of Oklahoma

From: [Leah Konicki](#)
To: [McCord, Beth K](#); "ibiggs@indianalandmarks.org"
Cc: "[Carpenter, Patrick A](#)"; [Ross, Anthony](#); "[Christine Meador](#)"; [Adin McCann](#); [Chris Schultz](#); [Harry Nikides](#); "ericka.miller@indy.gov"; [Kumar, Anuradha](#); [Miller, Shaun \(INDOT\)](#); [Branigin, Susan](#)
Bcc: [Clerical](#)
Subject: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana
Date: Wednesday, November 24, 2021 9:38:47 AM
Attachments: [Co Line Rd ATL DN2002553 HPR Add RDL 11.23.2021.pdf](#)

Des. No.: 2002553

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson counties

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067, DHPA No. 27053).

As part of Section 106 of the National Historic Preservation Act, an Addendum to the Historic Property Report has been prepared and is ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (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 as soon as you can.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Leah J. Konicki
Principal Investigator - Architectural Historian
Cultural Resources Manager

ASC Group, Inc.

9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300 ext. 103 (office)
317.565.9100 (cell)

[Facebook](#) | [LinkedIn](#) | [Web](#)

From: [Miller, Shaun \(INDOT\)](#)
To: [Diane Hunter](#); "thpo@estoo.net"
Cc: [Ross, Anthony](#); [Korzeniewski, Patricia J](#); [Leah Konicki](#)
Subject: FW: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana
Date: Wednesday, November 24, 2021 4:43:06 PM
Attachments: [Co Line Rd ATL DN2002553 HPR Add RDL 11.23.2021.pdf](#)

Des. No.: 2002553

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson counties

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067, DHPA No. 27053).

As part of Section 106 of the National Historic Preservation Act, an Addendum to the Historic Property Report has been prepared and is ready for review and comment by consulting parties.

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Thank you in advance for your input,

Shaun Miller
INDOT, Cultural Resources Office
Archaeology Team Lead
(317)416-0876



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-ES
Indianapolis, Indiana 46204

PHONE: (317) 296-0799

Eric Holcomb, Governor
Joe McGuinness, Commissioner

December 20, 2021

This letter was sent to the listed parties.

RE: County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067;
DHPA Project 27053

Dear Consulting Party,

The City of Indianapolis, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553).

This letter is part of the Section 106 review process for this project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. We are requesting comments from you regarding the possible effects of this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

A Section 106 early coordination letter was distributed on February 16, 2021. In addition, a letter distributed on June 3, 2021 notified consulting parties that a Historic Property Report (HPR) and a Phase Ia archaeology report were available for review and comment. A letter distributed on November 24, 2021, notified consulting parties that an addendum to the HPR was available for review and comment.

The proposed undertaking is on County Line Road, and begins 0.30 mile west of Morgantown Road and extends east to State Route (SR) 135/Meridian Street in Marion and Johnson counties, Indiana. It is within City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Maywood USGS Topographic Quadrangle, in Sections 21, 22, 23, 26, 27, and 28, Township 14 North, Range 3 East.

County Line Road is classified as a two-lane primary arterial roadway through the majority of the project corridor. The road expands to five lanes (two lanes in each direction with a turning lane to Meridian Street) between South Illinois Street and SR 135. The majority of the project area does not have pedestrian facilities, curb and gutter, or shoulders. Sidewalks, curb and gutter, and shoulders are only associated with the five lane section of County Line Road between South Illinois Street and Royal Meadow Drive.

There are two major intersections along County Line Road within the project limits: Morgantown Road and Railroad Road/Peterman Road. The Morgantown Road intersection is controlled by a traffic signal and has left turn lanes in all directions. There is a steep hill on County Line Road just west of this intersection, with an existing roadway grade of approximately 9 percent.

The Railroad Road/Peterman Road intersection is controlled by a 4-way stop sign, with a single approach lane from all four directions. The Indiana Railroad has a single-track rail line immediately adjacent to Railroad Road/Peterman Road, with an at-grade crossing of County Line Road less than 50 feet west of the intersection. The crossing has overhead flashers but no gates.

The existing structure over Pleasant Creek Run (Structure No. 49-4503F) is approximately 650 feet east of the Morgantown Road intersection. It is a 3-span concrete box beam bridge approximately 135 feet in length. The second existing structure over Buffalo Creek (Structure No. 49-4510F) is located just west of Leisure Lane on County Line Road. It is a 3-span reinforced concrete slab approximately 81 feet in length.

The proposed project includes County Line Road being expanded to a five-lane road (two 11 foot lanes in each direction and a 13-foot two-way left turn lane) with a 10-foot multi-purpose trail on the north side, 6-foot grass buffers on either side and a 6-foot sidewalk on the south side of the roadway. The two existing bridges will also be replaced to accommodate the additional travel lanes. The proposed bridge structures will accommodate the proposed roadway with the only modification to the typical section being that the grass buffers will be 2 feet per side within the bridge structure limits. The project will also construct stormwater detention, enclosed stormwater system, and address the sharp vertical curve at Morgantown Road.

The purpose of the South County Line Road Project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor. The need for this project is the existing and future capacity restrictions as the projected traffic demands will exceed the capacity of the existing two-lane configuration. Additionally, there are no pedestrian or bicycle facilities associated with the existing roadway which is in a high density residential area.

HNTB is under contract with the City of Indianapolis to advance the environmental documentation for the referenced project. ASC Group, Inc., has been subcontracted to complete the Section 106 documentation for the project.

In accordance with 36 CFR 800.2 (c), you were invited to become a consulting party as part of the Section 106 process, or you are hereby invited to become a consulting party as part of the Section 106 process. Entities that have previously accepted consulting party status—as well as additional entities that are currently being invited to become consulting parties—are identified in the attached list.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, to assess the undertaking's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* available online at <https://www.achp.gov/sites/default/files/documents/2017-01/CitizenGuide.pdf>.

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE contains no resources listed in the National Register of Historic Places (NRHP).

With regard to archaeological resources, an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards identified one site within the project area. As a result of these efforts, site 12-Ma-1082 was recommended not eligible for listing in the NRHP and no further work is recommended.

The archaeology report addendum is available for review in IN SCOPE (Tribes only) 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 these documents and to respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If you prefer a hard-copy of this material, please respond to this email with your request as soon as you can.

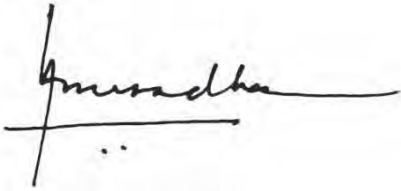
Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party or if you have not previously accepted consulting party status and you do not respond to this letter, you will not be included on the list of consulting parties for this project and will not receive further information about the project unless the design changes. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

For questions concerning specific project details, you may contact Leah J. Konicki of ASC Group, Inc. at 317-915-9300, ext. 103, or lkonicki@ascgroup.net. All future responses regarding the proposed project should be forwarded to ASC Group, Inc. at the following address:

Leah J. Konicki
Principal Investigator – Architectural Historian
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, IN 46256
lkonicki@ascgroup.net.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Sincerely,



Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Distribution List:

Beth K. McCord, Deputy State Historic Preservation Officer
Joshua Biggs, Indiana Landmarks, Central Regional Office, jbiggs@indianalandmarks.org
Miami Tribe of Oklahoma

From: [Leah Konicki](#)
To: ["McCord, Beth K"; "jbiggs@indianalandmarks.org"](#)
Cc: ["Carpenter, Patrick A"; "Ross, Anthony"; "Christine Meador"; "Adin McCann"; "Chris Schultz"; Harry Nikides; "ericka.miller@indy.gov"; "Kumar, Anuradha"; "Miller, Shaun \(INDOT\); "Branigin, Susan"; "Korzeniewski, Patricia J"; Andrea Crider; Sarah Terheide](#)
Bcc: [Clerical](#)
Subject: RE: FHWA Project: Des. No. 2002553; Archaeology Report Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana
Date: Tuesday, December 21, 2021 11:00:32 AM
Attachments: [County Line Rd ATL Des 2002553 PhIa Add RDL.PDF](#)

Des. No.: 2002553, DPW Project ST-45-067, DHPA No. 27053

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties, Indiana

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067; DHPA 27053).

As part of Section 106 of the National Historic Preservation Act, an addendum to the archaeology report has been prepared and is ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (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 as soon as you can.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Leah J. Konicki
Principal Investigator - Architectural Historian
Cultural Resources Manager

ASC Group, Inc.

9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300 ext. 103 (office)
317.565.9100 (cell)

[Facebook](#) | [LinkedIn](#) | [Web](#)

From: [Korzeniewski, Patricia J](#)
To: [thpo@estoo.net](#); [Diane Hunter](#); [lpappenfort@peoriatribes.com](#); [matthew.bussler@pokagonband-nsn.gov](#); [tonya@shawnee-tribe.com](#); [lheady@delawaretribe.org](#); [Kstand@Peoriatribes.com](#)
Cc: [Miller, Shaun \(INDOT\)](#); [Korzeniewski, Patricia J](#); [Carmany-George, Karstin \(FHWA\)](#); [Leah Konicki](#); [Ross, Anthony](#); [Carpenter, Patrick A](#)
Subject: FHWA Project: Des. No. 2002553; Archaeology Report Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana
Date: Tuesday, December 21, 2021 11:08:42 AM
Attachments: [County Line Rd ATL Des 2002553 PhIa Add RDL.PDF](#)

Des. No.: 2002553, DPW Project ST-45-067, DHPA No. 27053

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties, Indiana

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067; DHPA 27053).

As part of Section 106 of the National Historic Preservation Act, an addendum to the archaeology report has been prepared and is ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (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 as soon as you can.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Patricia Jo Korzeniewski
Archaeologist and Environmental Manager
INDOT, Cultural Resources Office
100 North Senate Avenue, N758-ES
Indianapolis, Indiana 46204
PKorzeniewski@indot.in.gov

1-317-416-4377

M-F 8:00 - 4:00



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

BKM:DMK:PCD:HAT:dmk

emc: Kari Carmany-George, FHWA
Erica Tait, FHWA
Anuradha Kumar, INDOT
Shaun Miller, INDOT
Susan Branigin, INDOT
Anthony Ross, INDOT
Patrick Carpenter, INDOT
Leah J. Konicki, ASC Group
Indiana Landmarks Central Regional Office
Amy Borland, DNR-DHPA
Paul Diebold, DNR-DHPA
Danielle Kauffmann, DNR-DHPA
Beth McCord, DNR-DHPA
Chad Slider, DNR-DHPA
Holly Tate, DNR-DHPA



**EASTERN SHAWNEE
CULTURAL PRESERVATION DEPARTMENT**

70500 East 128 Road, Wyandotte, OK 74370

December 28, 2021

INDOT - Indiana Department of Transportation
100 N. Senate Ave. IGCN642
Indianapolis, IN 46201

RE: County Line Road Added Travel Lanes Project; HPR Addendum Des No. 2002553; DPW Project ST-45-067; DHPA Project 27053, Marion and Johnson County, IN

Dear Mr. Miller,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Marion and Johnson County, IN. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

Paul Barton, Tribal Historic Preservation Officer (THPO)
Eastern Shawnee Tribe of Oklahoma
(918) 666-5151 Ext:1833



PEORIA TRIBE OF INDIANS OF OKLAHOMA

118 S. Eight Tribes Trail (918) 540-2535 FAX (918) 540-2538

P.O. Box 1527

MIAMI, OKLAHOMA 74355

CHIEF
Craig Harper

SECOND CHIEF
Rosanna Dobbs

December 29, 2021

Patricia Korzeniewski
Archaeologist & Environmental Manager
INDOT
100 N Senate Ave., N758 – ES
Indianapolis, IN 46204

Re: DES#2002553 County Line Road Added Travel Lanes Project, IN

Thank you for providing notice of the referenced project. The Peoria Tribe of Indians of Oklahoma is unaware of a direct link to the newly proposed project location.

The Peoria Tribe of Indians of Oklahoma is also unaware of items covered under Native American Graves Protection and Repatriation Act (NAGPRA) to be associated with the proposed project site, including funerary or sacred objects; objects of cultural patrimony; or ancestral human remains.

The Peoria Tribe has no objection at this time to the proposed project. If, however, at any time items are discovered which fall under the protection of NAGPRA, the Peoria Tribe requests immediate notification and consultation. In addition, state, local and tribal authorities should be advised as to the findings and construction halted until consultation with all concerned parties has occurred.

Please feel free to contact me directly at the number above if additional consultation is necessary. Thank you again for your consideration with this matter.

Sincerely,

Charla K. EchoHawk
Director of Cultural Preservation

TREASURER
Hank Downum

SECRETARY
Tonya Mathews

FIRST COUNCILMAN
Carolyn Ritchey

SECOND COUNCILMAN
Kara North

THIRD COUNCILMAN
Isabella Burrell



Division of Historic Preservation & Archaeology · 402 W. Washington Street, W274 · Indianapolis, IN 46204-2739
Phone 317-232-1646 · Fax 317-232-0693 · dhpa@dnr.IN.gov



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:bnk

emc: Kari Carmany-George, FHWA
Erica Tait, FHWA
Anuradha Kumar, INDOT
Shaun Miller, INDOT
Susan Branigin, INDOT
Anthony Ross, INDOT
Patrick Carpenter, INDOT
Leah J. Konicki, ASC Group
Indiana Landmarks Central Regional Office
Danielle Kauffmann, DNR-DHPA
Beth McCord, DNR-DHPA



**EASTERN SHAWNEE
CULTURAL PRESERVATION DEPARTMENT**

70500 East 128 Road, Wyandotte, OK 74370

January 12, 2022

INDOT - Indiana Department of Transportation
100 N. Senate Ave. IGCN642
Indianapolis, IN 46201

RE: *Des No. 2002553, Marion and Johnson County, Indiana*

Dear Ms. Korzeniewski,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Marion and Johnson County, Indiana. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

Paul Barton, Tribal Historic Preservation Officer (THPO)
Eastern Shawnee Tribe of Oklahoma
(918) 666-5151 Ext:1833



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-ES
Indianapolis, Indiana 46204

PHONE: (317) 296-0799

Eric Holcomb, Governor
Joe McGuinness,
Commissioner

February 9, 2022

Kari Carmany-George
Planning and Environmental Specialist
Federal Highway Administration – Indiana Division
575 N. Pennsylvania St., Room 254
Indianapolis, IN 46204

Dear Ms. Carmany-George,

The INDOT-Cultural Resources Office (INDOT-CRO) respectfully requests that FHWA review the enclosed documentation regarding the eligibility for listing in the National Register of Historic Places (NRHP) of the following five (5) residential subdivisions in Indianapolis, Indiana: 1) Richards and Landers Mt. Pleasant Subdivision; 2) Wood Creek Estates; 3) Carefree Subdivision; 4) Ridge Hill Trails; and 5) Hill Valley Estates.¹ The subdivisions are located within the Section 106 Area of Potential Effect (APE) for the County Line Road Added Travel Lanes project (INDOT Des No. 2002553) in Indianapolis, Marion and Johnson Counties, Indiana.

If FHWA-Indiana Division deems it to be appropriate, INDOT-CRO requests that this information be forwarded to the FHWA Federal Preservation Officer for review.

INDOT-CRO would be happy to provide additional information upon request. All questions regarding this matter should be directed to Patrick Carpenter at pacarpenter@indot.in.gov or 317-416-7960.

Background and Timeline of Consultation with SHPO

A Section 106 early coordination letter was distributed to consulting parties on February 16, 2021. The IN-SHPO responded in a letter dated February 25, 2021 with no substantive comments or indication they had previously identified National Register eligible subdivisions along the corridor.

A Historic Property Report (HPR) and archaeological records check and reconnaissance survey report were distributed on June 3, 2021. The HPR was prepared by historians with ASC Group, Inc. who meet the Secretary of the Interior's Professional Qualification Standards. The HPR recommended the following subdivisions were not eligible for listing in the National Register of Historic Places (NRHP):

Richards and Landers Mount Pleasant Subdivision

¹ In their July 15, 2021 and December 21, 2021 letters, SHPO refers to this subdivision as Royal Meadows/Hill Valley Estates. Project consultants and INDOT-CRO have not identified the use of Royal Meadows in plats or covenants for the subdivision. There is no reference to Royal Meadows on the Hill Valley Homeowner's Association website. Therefore, INDOT-CRO will continue to refer to subdivision as Hill Valley Estates.

Glenns Valley Addition
Ridge Hill Trails
Carefree Subdivision
Meridian Park

In their July 6, 2021 response letter, as revised July 15, 2021, the SHPO stated its disagreement with the HPR's recommendations for Richards and Landers Mount Pleasant Subdivision, Ridge Hill Trails and Carefree Subdivision. The SHPO advised that these three subdivisions were eligible for the NRHP, along with two additional subdivisions, Wood Creek Estates and Royal Meadows/Hill Valley Estates².

In coordination with INDOT-CRO, the qualified professional consultant prepared an Addendum HPR, which provided additional research and analysis and responded to the points raised by IN-SHPO in their response letter. The Addendum HPR is enclosed for your reference. The Addendum was distributed to consulting parties on November 24, 2021. INDOT-CRO staff followed-up with the IN-SHPO in an email on November 29, 2021 writing that:

However, as we continue to have conversations about evaluation of post-war neighborhoods for this project and others, including several we are reviewing internally now, we would appreciate any further opportunity to discuss these evaluations with SHPO, virtually, in person-in office, or on site since the neighborhoods are relatively close by. If you all are open to a meeting, please let us know if you have a preference of venue and we can schedule one in the upcoming weeks.

The IN-SHPO responded via email on December 2, 2021:

If the meeting for this project is to debate the eligibility of resources, that might not be a productive use of everyone's time. Since Johnson County is in the next stages for the upcoming survey, subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section via desktop survey and on-site visits. Additional meetings may simply result in the recommendation that FHWA ask NPS for a formal determination of eligibility.

INDOT-CRO responded via email on December 13, 2021:

Thank you for your response and for sharing your thoughts on the value of a meeting for this project prior to your completing the review of submitted additional materials either on-site or in the office (through Teams or at the HiPriPro³). We understand that staff time prior to the holidays is limited and it might be more valuable to meet, if necessary, after SHPO staff had the opportunity to review the additional materials that we have provided.

In the meantime, however, we would really appreciate your sharing with us any information you may have on the Johnson County Survey. References to identification and eligibility determination have been made not just in the email below but also on a couple of other projects that your office has reviewed this year (Des. No. 2100071 & 1800082). It would be really useful to us to understand which "subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section".

Please see email chain in Appendix.

² See previous.

³High Priority Projects Meeting-a regularly recurring meeting between INDOT and IN-SHPO staff to discuss specific projects and general topics.

Subsequently, during the December 14, 2021 HiPriPro meeting, INDOT asked IN-SHPO if they would be willing to provide information related to the Johnson County Survey. The IN-SHPO declined to share the findings from the Johnson County Survey (See meeting summary in appendix). No further correspondence or consultation specific to this project occurred until IN-SHPO's formal comments on the Addendum HPR were received on December 21, 2021. In their response letter, the IN-SHPO continued to disagree with the eligibility recommendations for the subdivisions and advised that the following subdivisions are eligible for the NRHP:

Johnson County

Richards and Landers Mt. Pleasant Subdivision-under Criterion A

Wood Creek Estates-under Criteria A and C

Carefree Subdivision-under Criteria A and C

Marion County

Ridge Hill Trails-under Criteria A and C

Royal Meadows/Hill Valley Estates-under Criteria A and C

IN-SHPO's specific opinions for each subdivision are provided below in more detail. Correspondence with SHPO is also attached for your reference.

After further consideration, INDOT-CRO is willing to concede the eligibility of the Carefree Subdivision, as explained later in more detail. Nevertheless, we continue to believe that the remaining four subdivisions are not eligible for listing in the NRHP according to the requirements found in the "Residential Planning and Development in Indiana, 1940-1973" NRHP Multiple Property Documentation Form (MPDF). The MPDF was approved by the Keeper of the NRHP in 2018. IN-SHPO has indicated that the MPDF is the preferred document to reference when evaluating the NRHP eligibility of residential properties constructed between 1940 and 1973 in Indiana, excluding public and multifamily housing, which are not addressed in the MPDF.

Responses to SHPO's December 21 Letter

In their December 21, 2021 letter, the IN-SHPO provides some general observations on the Addendum HPR's approach to the evaluations and offers a few specific comments. Instead of rebutting or commenting on each SHPO statement, we want to address those that are most pertinent and reflect the ongoing overarching themes of the disagreements between SHPO and INDOT. In particular, we want to establish a contextual understanding to inform the specific subdivision evaluation disagreements that follow.

The December 21, 2021 letter from the IN-SHPO makes the following statements, "*First, many parts of the Addendum HPR were contradictory and the overall methodology presented is not consistent with past guidance*" and *Moreover, we observed multiple inconsistencies and contradictory statements within the Addendum HPR.*" INDOT-CRO disagrees with SHPO's broad portrayal of the Addendum HPR as being inconsistent or contradictory. The SHPO offered two specific instances of what they consider contradictory statements, both involving the evaluation for the Richards and Landers Mt. Pleasant Subdivision. These statements will be rebutted specifically in the subdivision eligibility disagreement section that follows. No other examples of inconsistencies or contradictions were noted by SHPO.

The IN-SHPO also states:

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 for an extensive pool of potentially eligible resources. We notice throughout the Addendum HPR 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 Addendum HPR.

SHPO's statement mischaracterizes the evaluations and is mixing the concepts of the subtype characteristics with the significance considerations and registration requirements. The Addendum HPR evaluations first compare the subdivisions to the subtype characteristics to understand how well they typify those traits. There are no statements indicating that all characteristics are necessary to be eligible. Once a subtype is identified, the evaluations proceed to apply the significance considerations and registration requirements defined in the MPDF to determine potential significance. The MPDF does provide specific registration requirements, "*In order to be eligible for listing, a historic district must generally meet the following requirements...*"(274) to which the Addendum HPR adheres. These registration requirements are distinct from determining the subtype characteristics.

Classifying a subdivision as a subtype is the first step in the analysis of whether a subdivision is eligible for listing in the NRHP. As described in *National Register Bulletin 16B: How to Complete the National Register Multiple Property Documentation Form*, "property type analysis is a tool for evaluating related properties." Type analysis is based on the identification of "physical and/or associative attributes" and may include the identification and analysis of subtypes, which "will be more detailed, and therefore more useful for the evaluation of identified properties" (14). In the case of this MPDF, two primary types are identified: "World War II-Era and Post-War Residential Development" and the "Single-family Residential Dwelling." Under the former type, five subtypes are identified.

In accordance with the guidelines set forth in *National Register Bulletin 16B*, the associative and physical attributes/characteristics of the development subtypes are related to the areas of historic significance under which a development may be evaluated. The typology itself was constructed with historic significance in mind. Each subtype revolves around historically significant trends, and the attributes are based on these trends. The subtypes are a tool to help guide determining significance. Thus, the first step in evaluating a subdivision according to the MPDF is to identify it as a type and subtype, based on the subtype attributes, followed by determining if it has significance under the National Register criteria. Simply being an example of a type is not enough to warrant eligibility. In regards to significance under Criterion A, the MPDF states:

Contextual information must be presented to differentiate a historic district from similar examples under the same theme and demonstrate importance within the appropriate level of significance (local, state, or national) under Criterion A. For example, a historic district may be found to be the first of a particular type of development or a planning model that influenced subsequent developments in the same context.

A historic district eligible under the MPDF is likely to be evaluated under Criterion A in the area of COMMUNITY PLANNING AND DEVELOPMENT in consideration of its contribution to land use, growth, and development within the applicable context or efforts to take advantage of housing provisions or legislation in the establishment of communities (270).

In the discussion of significance under Criterion C, the MPDF states:

In the context of COMMUNITY PLANNING AND DEVELOPMENT, a historic district must reflect, through its physical qualities, important design principles within the established level of

significance. It must possess distinctive characteristics of a particular type of development and period and be identifiable as a noteworthy entity compared to others in the same context (272).

Thusly, following the MPDF, the Addendum HPR identifies the most appropriate property type and applies the registration requirements to determine significance.

SHPO also provides this observation, “*Several generalizations are repeated throughout the Addendum HPR. The argument that these subdivisions can’t be significant because they are motivated by profit stands out to us.*” The Addendum HPR does not make this assertion. Rather, as a specific example, this is how the Addendum HPR refers to the profit aspect:

Judging from various newspaper advertisements, the reason for the planning and establishment of the development was to profit from selling lots and/or building houses (*The Indianapolis Star* 1961a). Hill Valley Estates is not associated with specific initiatives to provide housing to veterans or industrial workers. Hill Valley Estates was no more or less successful in meeting its intended purpose than any other of the vast number of residential subdivisions that arose in this area after World War II (121).

Rather than saying that this or other subdivisions can’t be eligible because they were motivated by profit, the evaluation is indicating that this is not a determining factor or consideration for significance. The Addendum HPR was pointing out that the other less-profit driven considerations listed in the MPDF, including housing geared toward veterans or WWII industrial workers did not apply in this case.

Another SHPO statement:

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.

While the Addendum HPR does not make the claim that a subdivision must be the first, best, or biggest of its kind, we understand SHPO’s point regarding exceptionalism in general. Nevertheless, just being an example of subtype does not equate to significance as the MPDF states:

While all developments of the period can broadly be considered associated with World War II-era and post-war era housing trends, mere occurrence during this period or vague association with residential planning and development trends of the era are not sufficient to warrant eligibility as a historic district. Eligible historic districts must clearly and explicitly demonstrate association with a particular theme or trend that is important in the applicable context (local, state, or national) and the total of its individual components must represent a cohesive, identifiable entity within that particular context (271).

And towards the end of their comments in the letter, SHPO makes the following points regarding subdivision ages:

Another concept we noticed while reviewing the Addendum HPR 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 consider SHPO's above-statement to be inconsistent with the MPDF. As the MPDF states under the list of requirements for eligibility: *"Developed primarily between 1940 and 1973, with the majority of individual resources and integral landscape-level features (e.g. configuration of the street network) dating to this period of development"* (274). For instance, in Wood Creek Estates approximately 65% of the houses were built after 1973. In Ridge Hill Trails, 77% of the houses were built after 1973. While we understand that individual properties that fall outside the 1940-1973 window may contribute to a potential district under certain circumstances, we contend that when the vast majority of a subdivision's houses fall outside that time period, then it would not be eligible.

Further, the MPDF did not arbitrarily determine 1973 as its end date. Regarding the MPDF's study period, it considers 1973 as a "distinct break." More specifically it states:

The growth of the national and Hoosier housing markets were steady and remarkable through 1973. In that year, several dramatic events sharply curtailed housing expansion both nationally and locally. Most notably, a severe recession emerged that lasted until 1975-1976, exacerbated by the Oil Embargo of 1973. The impact of the latter on the housing industry was particularly devastating as rising gas prices stunted the growth of the transportation network and the pervasiveness of the automobile culture upon which suburbanization depended. The resulting sharp decrease in housing starts provides a distinct break, nearly 50 years ago, which serves as a suitable end point for the context (1).

If a majority of a subdivision's houses were built after 1973 then it would need to meet Criteria Consideration G to be eligible.

The MPDF does address the application of Criteria Consideration G for evaluating properties that extend into the 1970s. Per the MPDF:

For example, a historic district developed over several years may include properties less than 50 years of age and/or have a period of significance extending into the 1970s or beyond. However, such districts need not possess (sic) exceptional significance and thus meet Criteria Consideration G if the majority of properties are more than 50 years of age or the primary period of significance is 50 years or more in the past (291).

The majority of the houses in Wood Creek Estates and Ridge Hill Trails were built after 1973. Therefore, following the reasoning spelled out in the MPDF, these subdivisions would have to possess exceptional significance under Criteria Consideration G if they are to be treated as National Register eligible. As shown in the Addendum HPR, there is no evidence that these subdivisions exhibit any exceptional importance as is required under Criteria Consideration G.

Therefore, for those subdivisions built primarily after 1973, there is no basis for them to be evaluated under the MPDF unless Criteria Consideration G is applied. Again, there is no supporting evidence in the Addendum HPR that any of these subdivisions have exceptional importance under Criterion Consideration G.

See more about these points in the following section.

Specific Subdivision Eligibility Disagreements

The full evaluations are provided in the enclosed Addendum HPR and the comments from SHPO are included in the attached correspondence. The previous section summarized the overarching disagreements between SHPO and INDOT on these evaluations, but there are a couple of key points for each subdivision that we consider important for FHWA's consideration.

Richards and Landers Mt. Pleasant Subdivision

Statement from 12/21/2021 SHPO letter:

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.

Prior to offering this opinion, earlier in the same letter, referring to “multiple inconsistencies and contradictory statements”, the SHPO states, “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 quoted part of SHPO's statement, not actually found in the Addendum HPR as quoted, seemingly refers to a passage from the Addendum HPR that states: “Given that not quite half of the residential lots had been built on through 1955 shows that the subdivision was not particularly attractive to builders looking to quickly construct housing” (13). Another statement from the Addendum HPR addressing the rate of construction, “Given this fact and the relatively slow build-out of the subdivision, the subdivision did not play an important role in providing economical housing in the readjustment era” (15).

How one interprets the rate of construction can be subjective. However, these statements in the Addendum are not inconsistent or contradictory. Our contention is that in the suburban housing market detailed in the MPDF, 13 years between when the subdivision was platted in 1947 and when the majority of it had been constructed in 1960 does not reflect a “brief period.” As a comparison, over 600 houses were built in the Carefree Subdivision in a span of 9 years between 1967 and 1976. Regardless, this argument is not a critical aspect of the evaluation; it is just part of the Transitional Development characteristic analysis. The length of the subdivision's build-out raises the question of whether it can truly convey the historical significance of the postwar readjustment period—when builders rushed to meet demand in the aftermath of the war—but the Addendum evaluation does not rest the eligibility argument on this aspect alone.

SHPO also offers this instance as an example of an inconsistency and/or contradictory statement:

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.

The exact phrase from the Addendum HPR is:

Use and influence of government provisions and standards:

The subdivision has a simple rectangular layout despite having ample room for FHA recommended traffic calming measures such as culs-de-sac. There were no earlier plats or road networks forcing this choice. This subdivision does not demonstrate particular significance in the use of government provisions or standards (16)

The phrase “Use and influence of government provisions and standards” is in the list of considerations for significance in the MPDF (270). SHPO’s paraphrasing adds in “projects” where it doesn’t appear in the Addendum HPR or MPDF in this context. “Projects” as used by SHPO in their letter adds a different context and meaning beyond “government provisions and standards” listed in the MPDF. The Addendum HPR is applying this latter concept from the MPDF to government programs specifically targeting housing development. Ultimately, the MPDF does not include proximity to major roadways as a consideration of significance. Therefore, the proximity to and view of SR 37 does not have any bearing on this subdivision’s NRHP eligibility.

INDOT-CRO agrees that this subdivision has some of the characteristics laid out in the MPDF of the Transitional Development subtype, but it is missing some of the key traits. For instance, the neighborhood is not located within or adjacent to the community core as outlined in the MPDF (267), as it is more than four miles from Greenwood’s center. SHPO mentions that the subdivision utilizes a grid plan as one of its defining characteristics. The MPDF states regarding the grid plan: “*Transitional Subdivisions were typically laid out on a grid and made use of existing plats, street layout and municipal services....*” (267). The MPDF also states: “*Using traditional street networks but incorporating modern housing and emergent concepts of planning and subdivision design.....*” (267). Again, the Richards and Landers Mt. Pleasant subdivision did not use a traditional street network-it was a wholly new and isolated neighborhood, and the use of a grid plan only reflects traditional design, there is no evidence of *emergent concepts of planning and subdivision design* nor did it make *use of existing plats, street layout and municipal services*.

Beyond the absence of some of the more key characteristics of the Transitional Development subtype, the consultant did not find any evidence that this subdivision contributed to the *land use, growth, and development within the applicable context or efforts to take advantage of housing provisions or legislation in the establishment of communities* as defined in the MDPF as a consideration for significance under Criterion A.

Wood Creek Estates

Statement from 12/21/2021 SHPO letter:

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.

As previously discussed, a majority of the houses (65%) in this subdivision were not constructed until after 1973. As a late example of the Custom Development subtype within the MPDF, and one that where the majority was built after the MPDF timeframe and are less than 50 years old, there is no research to indicate that the subdivision *made a contribution to land use, growth, and development within the*

applicable context as defined in the MPDF for Criterion A significance. We understand SHPO's contention that houses constructed after the endpoint of the MPDF timeframe in 1973 may be contributing to a potential district, but in this case, a majority of the subdivision was not built within the MPDF timeframe. It is a late example with no evidence that it contributed to the trends laid out in the MPDF.

Notwithstanding the majority of houses being constructed after 1973, there are other factors which we feel would make Wood Creek Estates not eligible. Primarily, the northern and southern sections of the subdivision are not connected by an interior road. Moreover, a circa 2000 subdivision known as Abbey Villa is situated between the two sections. As indicated in the Addendum HPR, the separation of the sections goes against FHA guidelines of planning a cohesive subdivision. Further, the MPDF states that, *"By nature, evaluation should focus on an identifiable development (e.g., a particular subdivision or planned development) defined by a common context and cohesive physical characteristics"* (269).

Further, as a means of comparative analysis, two other Custom Developments were considered as a comparison in the Addendum HPR, Colonial Meadows and Meridian Woods Park. Both subdivisions possess a greater degree of architectural variety, emphasized an integration of the neighborhood with natural features in advertising and were built primarily within the timeframe of the MPDF as opposed to Wood Creek Estates.

Carefree Subdivision

Statement from 12/21/2021 SHPO letter:

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.

While INDOT-CRO disagrees with some of the underpinnings of SHPO's reasoning for Carefree being eligible, for instance SHPO's statement that being "along a major roadway and easy access to churches or commercial buildings" is an aspect of significance, we do recognize that it exhibits more of the characteristics expected for an eligible Custom Development. Carefree is a cohesive neighborhood built primarily within the MDPF timeframe. Additionally, the inclusion of the pool and clubhouse is a unique feature of subdivisions in this locality. After further consideration, and although there are still some concerns about Carefree's eligibility, the consensus of INDOT-CRO and the Qualified Professional consultants is that this subdivision more closely exhibits its comparative subtype characteristics, the Custom Development, than the other subdivisions evaluated in the Addendum HPR.

Moreover, when considering the registration requirements, Carefree meets enough of these criteria that it should be considered an eligible historic district. Nevertheless, while INDOT-CRO is no longer recommending that Carefree is not eligible, the evaluation in the Addendum HPR contains valuable and pertinent information that should be considered for any future discussions of this and other similar subdivisions.

Ridge Hill Trails

Statement from 12/21/2021 SHPO letter:

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.

Similar to Wood Creek Estates, the majority of houses in the subdivision were built after the MPDF end point of 1973. Per the Addendum HPR, the subdivision was platted in five sections, between 1969 and 1977. Plats 3, 4 and 5 were not platted until 1974. Thus, three of the subdivision’s five sections were not platted until after the end point of the MPDF with 77 % of the subdivision’s houses not built until after 1974.

Regarding SHPO’s classification of this as an “Entry-level” Custom Development, “Entry-level Custom Development” does not appear in the MPDF and appears the SHPO is expanding upon the MPDF at their discretion. To that point, there are many ways in which working-class or lower-middle-class neighborhoods could be considered eligible for the NRHP per the registration guidelines described in the MPDF, such as an association with a particular ethnic group or factory or as a particularly good example of a Tract or Transitional development.

The characteristics of the Custom Development type, as described in the MPDF, were more difficult to achieve within less affluent neighborhoods. The presence of amenities, variation, and architect-designed or custom-built homes typically required more money than was affordable for working-class or lower-middle-class communities. According to the MPDF, Custom Developments were targeted at a new type of “sophisticated consumer.” They were *“tailored to meet a variety of needs and preferences.”* They are *“more distinguished in their design, layout, and configuration than Tract Developments and are typically carefully crafted to accommodate variations in topography, natural settings, or manmade features such as lakes and golf courses, which became critical selling points.”* Because of this, they were *“more expensive to develop than a Tract Subdivision”* (268). As the MPDF states, *“Custom Developments spanned a variety of economic ranges, although they were most typically associated with middle-class and upper-class populations”* (250).

The MPDF indicates that it is less likely—though not impossible—for a working-class or lower-middle-class neighborhood to possess the characteristics necessary to be considered a good example of the Custom Development subtype.

Moreover, under Criterion C specifically, the Ridge Hill Trails neighborhood does lack necessary cohesion, an important consideration in the MPDF. The Addendum HPR states:

However, it seems that the Ridge Hill Trails Subdivision only makes use of culs-de-sac in the later sections of the subdivision. The cul-de-sac type street can be seen in sections three and four, but not in sections one, two, or five (Figure RH 2). The difference in streetstyles gives the youngest sections on the west side of the subdivision a different feeling than the older sections. The different appearance and feel of sections three and four make them read like a different subdivision than the earlier platted sections one and two, which do not use culs-de-sac (93).

Hill Valley Estates

Statement from 12/21/2021 SHPO letter:

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.

Please refer to our previous response to SHPO’s use of “entry-level.”

Hill Valley Estates is a sprawling subdivision including 1,006 homes built in 29 sections, developed in successive plats from 1960 through 1978. The portion of the subdivision within the project’s APE is Section 28 which was not platted until 1977. The houses within this section were primarily built in the 1980s.

Due to the broad timeframe and sprawling size of the subdivision, there appear to be enough variations in house types and layout that identifying this as a single, cohesive entity would be difficult. For instance, US 135, a five-lane road extends through the subdivision, separating Sections 1-8 from the western sections. Due to the successive development by different builders, the sections exhibit varying characteristics, including differing sidewalk installation practices (some sections with sidewalks on each side of street, while others have only sidewalks on one side), housing types and tree density. As an example, West Valley View Drive in Section 22 features a more uniform building stock with a stretch of split-levels that appear more as tract housing than that of other sections of the subdivision.

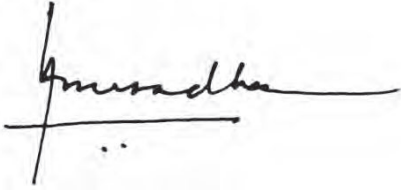
Due to the size of the subdivision, with only a small portion within the APE, INDOT-CRO acknowledges that there may be sections of the subdivision that are eligible for the National Register, but that evaluation is beyond the scope of this project. Section 28 contained within the APE should not be considered contributing to a district as it was not platted until 1977 well outside the MPDF timeframe. While a continuation of the overall successive plats of the Hill Valley Estates, many of the houses within this 1977 plat were not constructed until the mid-1980s.

In summary, INDOT-CRO disagrees with SHPO’s opinions on four of the five subdivisions evaluated in the Addendum HPR.

Although the SHPO developed the MPDF and advised its application to evaluate post-WWII subdivisions, there seems to be a disconnect in its use by the SHPO. In particular, SHPO includes a type that is not discussed in the MPDF (“entry-level” Custom Developments) for Hill Valley Estates. Further, they commingle typology and significance, most notably regarding the evaluation of the Richards and Landers Mt. Pleasant subdivision. In addition, the SHPO, counter to the information provided in the MPDF, is arguing for the eligibility of subdivisions, in particular Wood Creek Estates and Ridge Hill Trails, that have a majority of structures built after the MPDF’s end date of 1973. These specific disagreements reflect a larger pattern with SHPO’s interpretation and application of the MPDF that will have significant implications for all future evaluations involving Post-WW II subdivisions.

We appreciate FHWA's consideration of these disagreements with IN-SHPO. Please let us know if you have any questions. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Anuradha", with a horizontal line drawn underneath it.

Anuradha V. Kumar, Manager
Cultural Resources Office
Environmental Services

Attachments:

Attachment A: SHPO Response Letter (December 21, 2021)

Attachment B: Email Correspondence Between INDOT-CRO and SHPO (Various-November-December 2021)

Attachment C: Summary of December 21, 2021 HiPriPro Meeting

Attachment D: Addendum to Historic Property Report (November 24, 2021)



Indiana Department
of Natural Resources

Eric Holcomb, Governor
Daniel W. Bortner, Director

Division of Historic Preservation & Archaeology · 402 W. Washington Street, W274 · Indianapolis, IN 46204-2739
Phone 317-232-1646 · Fax 317-232-0693 · dhpa@dnr.IN.gov ·



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

Leah J. Konicki
December 21, 2021
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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

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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

Leah J. Konicki
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Page 4

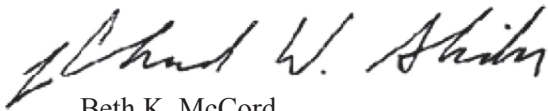
further field investigations. Further archaeological investigations must be conducted in accordance with the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716).

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:DMK:PCD:HAT:dmk

emc: Kari Carmany-George, FHWA
Erica Tait, FHWA
Anuradha Kumar, INDOT
Shaun Miller, INDOT
Susan Branigin, INDOT
Anthony Ross, INDOT
Patrick Carpenter, INDOT
Leah J. Konicki, ASC Group
Indiana Landmarks Central Regional Office
Amy Borland, DNR-DHPA
Paul Diebold, DNR-DHPA
Danielle Kauffmann, DNR-DHPA
Beth McCord, DNR-DHPA
Chad Slider, DNR-DHPA
Holly Tate, DNR-DHPA

From: [Kumar, Anuradha](#)
To: [Kauffmann, Danielle M](#)
Cc: [Branigin, Susan](#); [Ross, Anthony](#); [Diebold, Paul](#); [Carpenter, Patrick A](#); [McCord, Beth K](#); [Slider, Chad \(DNR\)](#)
Subject: RE: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana
Date: Monday, December 13, 2021 11:06:51 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
Importance: High

Danielle:

Thank you for your response and for sharing your thoughts on the value of a meeting for this project prior to your completing the review of submitted additional materials either on-site or in the office (through Teams or at the HiPriPro). We understand that staff time prior to the holidays is limited and it might be more valuable to meet, if necessary, after SHPO staff had the opportunity to review the additional materials that we have provided.

In the meantime, however, we would really appreciate your sharing with us any information you may have on the Johnson County Survey. References to identification and eligibility determination have been made not just in the email below but also on a couple of other projects that your office has reviewed this year (Des. No. 2100071 & 1800082). It would be really useful to us to understand which "subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section".

We would appreciate your response to this email and look forward to continuing collaboration between our two agencies on postwar resources and other preservation related issues.

Thank you

Anuradha V. Kumar

Manager, Cultural Resources Office

Environmental Services

Indiana Department of Transportation

Indianapolis, IN 46204

Office: 317-296-0799

Core Office Hours - Mon. to Friday 8.00 am to 4.00 pm



From: Kauffmann, Danielle M <DKauffmann@dnr.IN.gov>

Sent: Thursday, December 2, 2021 8:07 AM

To: Carpenter, Patrick A <PACarpenter@indot.IN.gov>; McCord, Beth K <BMccord@dnr.IN.gov>; Slider, Chad (DNR) <CSlider@dnr.IN.gov>

Cc: Kumar, Anuradha <akumar@indot.IN.gov>; Branigin, Susan <SBranigin@indot.IN.gov>; Ross, Anthony <ARoss3@indot.IN.gov>; Diebold, Paul <PDiebold@dnr.IN.gov>

Subject: RE: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana

Hi Patrick,

Thanks for your message. I understand your point as to not needing a formal CP meeting as there is no other consulting party input for this project. It would also be extremely difficult to schedule one within the comment period as the holidays are fast approaching and staff time in the office is limited/dwindling. This project is not at the top of my queue as of today, but I wanted to answer your email rather than leaving it in limbo until I begin to review the materials.

However, I'll pass along some thoughts from Paul regarding an additional meeting to discuss eligibility of resources pertaining to this project. If it is an opportunity to discuss what we are seeing in these districts, there may be some value in the idea of meeting. However, the uptick of meetings lately result in a remarkably long amount of time spent on both sides that seem to reach the same impasse. If the meeting for this project is to debate the eligibility of resources, that might not be a productive use of everyone's time. Since Johnson County is in the next stages for the upcoming survey, subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section via desktop survey and on-site visits. Additional meetings may simply result in the recommendation that FHWA ask NPS for a formal determination of eligibility.

Thank you,

Danielle M Kauffmann
Historic Structures Team Leader
Indiana Department of Natural Resources
Division of Historic Preservation and Archaeology
402 W. Washington St., Rm W274
Indianapolis, IN 46204
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From: Carpenter, Patrick A <PA_Carpenter@indot.IN.gov>

Sent: Monday, November 29, 2021 10:32 AM

To: McCord, Beth K <BMccord@dnr.IN.gov>; Slider, Chad (DNR) <CSlider@dnr.IN.gov>; Kauffmann, Danielle M <DKauffmann@dnr.IN.gov>

Cc: Kumar, Anuradha <akumar@indot.IN.gov>; Branigin, Susan <SBranigin@indot.IN.gov>; Ross, Anthony <ARoss3@indot.IN.gov>

Subject: FW: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana

Dear SHPO,

The HPR Addendum reflects a small expansion of the APE, incorporating additional properties including one previously identified as NRHP eligible in I69 Section 6. The HPR Addendum also provides additional analysis/evaluation of the five post-war neighborhoods (further specific comparison to MPDF, property age breakdown and comparative analysis) that SHPO previously indicated were eligible based on their review of the original HPR. We would appreciate SHPO's further consideration based on the additional information contained in the addendum HPR.

Since to this point we haven't had any other consulting party input on the neighborhoods' eligibility we don't think a formal CPs meeting would be useful during the HPR Addendum comment period. However, as we continue to have conversations about evaluation of post-war neighborhoods for this project and others, including several we are reviewing internally now, we would appreciate any further opportunity to discuss these evaluations with SHPO, virtually, in person-in office, or on site since the neighborhoods are relatively close by. If you all are open to a meeting, please let us know if you have a preference of venue and we can schedule one in the upcoming weeks.

Thank you,

Patrick Carpenter
Section 106 Specialist, Cultural Resources Office
Environmental Services
Indiana Department of Transportation
100 N Senate Ave., IGCN- Room N758-ES
Indianapolis, IN 46204-2216
317-416-7960

From: Leah Konicki <lkonicki@ascgroup.net>
Sent: Wednesday, November 24, 2021 9:43 AM
To: DNR DHPARReview <DHPARReview@dnr.IN.gov>
Cc: Carpenter, Patrick A <PACarpenter@indot.IN.gov>; Ross, Anthony <ARoss3@indot.IN.gov>; Christine Meador <CMeador@hntb.com>; Adin McCann <amccann@hntb.com>; Chris Schultz <cjschultz@HNTB.com>; hNikides <hnikides@ascgroup.net>; 'ericka.miller@indy.gov' <ericka.miller@indy.gov>; Kumar, Anuradha <akumar@indot.IN.gov>; Miller, Shaun (INDOT) <smiller@indot.IN.gov>; Branigin, Susan <SBranigin@indot.IN.gov>; 'jbiggs@indianalandmarks.org' <jbiggs@indianalandmarks.org>; McCord, Beth K <BMccord@dnr.IN.gov>
Subject: RE: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Ms. Burkett,

We have completed an addendum to the HPR for the above-referenced project, which we are hereby submitting for review.

Because of the size of the document, it has been saved for you at an ftp site, log in information below. We will also prepare a hard copy to be sent via regular mail or UPS.

The best way to access the ftp site is to use either File Explorer, and enter <ftp.ascgroup.net> or to use Internet Explorer. We apologize for any inconvenience. Please let me know if there are any difficulties in accessing or downloading.

Thank you, and happy Thanksgiving.

To retrieve your file, click on the following link or copy it into your browser and sign in using the Username and Password. If you have any problems retrieving the files, try copying it into Internet Explorer. Please let us know if you can't retrieve it. This access expires on 12/06/2021.

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Username: ASC02

Password: sUbmerge7

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Leah J. Konicki

Principal Investigator - Architectural Historian

Cultural Resources Manager

ASC Group, Inc.

9376 Castlegate Drive

Indianapolis, Indiana 46256

317.915.9300 ext. 103 (office)

317.565.9100 (cell)

From: Leah Konicki

Sent: Wednesday, November 24, 2021 9:39 AM

To: McCord, Beth K <BMccord@dnr.IN.gov>; 'jbiggs@indianalandmarks.org' <jbiggs@indianalandmarks.org>

Cc: 'Carpenter, Patrick A' <PACarpenter@indot.IN.gov>; Ross, Anthony <ARoss3@indot.IN.gov>;

'Christine Meador' <CMeador@HNTB.com>; Adin McCann <amccann@HNTB.com>; Chris Schultz <cjschultz@HNTB.com>; Harry Nikides <hNikides@ascgroup.net>; 'ericka.miller@indy.gov' <ericka.miller@indy.gov>; Kumar, Anuradha <akumar@indot.IN.gov>; Miller, Shaun (INDOT) <smiller@indot.IN.gov>; Branigin, Susan <SBranigin@indot.IN.gov>

Subject: FHWA Project: Des. No. 2002553; HPR Addendum, County Line Road Added Travel Lanes, Marion and Johnson counties, Indiana

Des. No.: 2002553

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson counties

The City of Indianapolis Department of Public Works, in coordination with the Federal Highway Administration and the Indiana Department of Transportation, proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067, DHPA No. 27053).

As part of Section 106 of the National Historic Preservation Act, an Addendum to the Historic Property Report has been prepared and is ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (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 as soon as you can.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal consulting parties may enter the process at any time and are encouraged to respond to this notification with any comments or concerns at their earliest convenience.

Tribal contacts may contact Shaun Miller at smiller@indot.in.gov or 317-416-0876 or Kari Carmany-George at FHWA at K.CarmanyGeorge@dot.gov or 317-226-5629.

Thank you in advance for your input,

Leah J. Konicki

Principal Investigator - Architectural Historian

Cultural Resources Manager

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December 14, 2021 HiPriPro Meeting Agenda

1. Update on MidStates Project and the associated PA – Patrick Carpenter—Patrick provided an update on the project including what to expect in the PA. Specifically, the PA will have provisions to clear “spin-off” projects under the Minor Projects PA if they qualify. Patrick explained that under the umbrella of the Mid-States project, in addition to the corridor project, other smaller projects will be developed. In response to a question from SHPO-Patrick clarified that other “spin-off” projects will have independent utility. The PA will be included with the DEIS and provided to SHPO and CPs for review and comment. Patrick will continue to update SHPO.
2. Update on Des. No. 1700195 – Brookville Wall Reconstruction – No Build
3. Thoughts on Nathan Holth’s comments on the HBAA for SR 933 Bridge Rehab, St. Joseph County (Des. No. 1900011; DHPA 26693) & whether the preferred alternative should be labeled a rehab. We suggest just adding to the current title to indicate it does NOT meet the SOI standards. --- Action item: Mary will coordinate with Kari Carmany-George about change in title of preferred alternative and issuing updated HBAA with the new preferred alternative title acknowledging it doesn't meet the SOI standards for rehab. Will also coordinate with District to see if they'd be open to any interpretive signage to explain the bridge's history and would acknowledge a reconstruction has occurred. SHPO noted that the HBPA says in the Standard Treatment Approach that the bridge owner will develop plans to rehabilitate the bridge in accordance with the Secretary of the Interior's Standards for Rehabilitation, *or as close to the Standards as is practicable*. This would seem to be an instance of “as close as is practicable.”
4. Update on LPA Exchange Program -- Anthony
5. General topic for discussion: recently, many CRO-SHPO discussions have focused on eligibility disagreements (where CRO thinks something isn't eligible). We don't discuss the many instances where CRO thinks something is eligible (sometimes disagreeing with consultants). CRO wants to make sure that SHPO doesn't have false impression that CRO is biased against eligibility (including postwar stuff). Should/how can CRO address this issue?
 - CRO referenced an email sent the day before requesting SHPO share the forthcoming Johnson County IHSSI survey.
 - SHPO has cited the survey as a basis for issuing eligibility opinions on several recent projects. In an 11/23 letter for Des No. 2100071, SHPO stated that the survey was in the “pre-planning phase.” The letter went on to state that, as part of the survey, SHPO staff had already identified a historic district located within the APE for the project.
 - In a 12/3 email regarding its eligibility opinions for 2002553, SHPO stated, "Since Johnson County is in the next stages for the upcoming survey, subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section via desktop survey and on-site visits."
 - At the 12/14 HiPriPro meeting, CRO hoped to clarify the status of the survey since it seemed unusual for SHPO to make determinations as part of a "pre-planning phase" of a survey. Normally, it would seem that the determinations would be made later in the process. If on the other hand, research, field work, and other documentation had been prepared--as would be expected as part of the NRHP determination process--CRO hoped that SHPO would share that information so that it could be taken into account for future transportation planning purposes.

- At the meeting, however, SHPO stated that the survey as it currently existed was based on “sketchy” information that was mostly in “[DHPA Survey and Registration staff member] Amy [Borland’s] mind” so it could not share the information. Even if it did exist in a documented format, SHPO expressed concerns about sharing it with CRO, because then they might feel compelled to share the information more broadly and that was something they did not want to do and/or did not feel prepared to do.
- CRO expressed concern that NRHP determinations were being made on the basis of non-public information. Federal regulations require CRO, acting on behalf of FHWA, to explain the reasons for their eligibility determinations within the public documents that are produced in the Section 106 process. It's unclear how CRO would be able to fulfill such requirements if SHPO is unwilling to share documentation regarding NRHP determinations that it has already made.
- Even if SHPO would not share the survey results, CRO requested that if a similar situation arises in the future, SHPO alert CRO to the presence of a property that has been determined eligible during the early coordination phase of the project. If CRO was aware of the presence of such properties before a historic property report was prepared, it could save a significant amount of time and money and reduce risk/uncertainty.
- SHPO said that they would probably not be able to alert CRO in such circumstances because in order to do so, they would have to ask their NR staff about the presence of such properties for every project, something that is not practicable in their view.

**Addendum to
Historic Property Report for the
County Line Road Added Travel Lanes Project,
Perry Township, Marion County and White River Township, Johnson County, Indiana
(Des. No. 2002553; DPW Project ST-45-067; DHPA No. 27053)**

By

**Leah J. Konicki, MEd, Sarah Terheide, MA,
Nora Hillard, and Douglas Terpstra, MS**

**Submitted By:
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**This report is available
on InScope**

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Indianapolis, Indiana 46204
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Leah J. Konicki, Principal Investigator

November 23, 2021



**CULTURAL • ENVIRONMENTAL • HAZARDOUS
EVALUATION & CONSULTING**



U.S. Department
of Transportation
**Federal Highway
Administration**

Indiana Division

May 9, 2022

575 N. Pennsylvania Street, Room 254
Indianapolis, IN 46204
Main (317) 226-7475
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In Reply Refer To:
HDA-IN

Ms. Joy Beasley, Keeper
National Register of Historic Places
National Park Service
1849 C Street, NW (MS2280)
Washington DC 20240

Subject: Request for Determination of Eligibility

The Federal Highway Administration (FHWA), in coordination with the Indiana Department of Transportation (INDOT), is requesting that the Keeper of the National Register provide a determination of eligibility for the inclusion of four (4) residential subdivisions in Indianapolis, Indiana, in the National Register of Historic Places (NRHP). All the subdivisions were built in the period following World War II and are referred to as post-World War II residential resources. The subdivisions are named 1) Richards and Landers Mt. Pleasant Subdivision, 2) Wood Creek Estates, 3) Ridge Hill Trails, and 4) Hill Valley Estates¹. There is a question regarding the eligibility of these four neighborhoods for listing on the NRHP, and therefore, FHWA is submitting this request pursuant to 36 CFR 63.2 (c) and (d).

The subdivisions are located in the area of potential effect (APE) for the County Line Road Added Travel Lanes project (INDOT Des No. 2002553) in Indianapolis, Marion and Johnson Counties, Indiana. The project involves adding an additional travel lane along this road along with intersection improvements at intersecting roadways. The subdivisions are located within the project limits adjacent to County Line Road.

Background and Timeline of Consultation with Indiana State Historic Preservation Office (IN-SHPO)

A Section 106 early coordination letter was distributed to consulting parties on February 16, 2021. The IN-SHPO responded in a letter dated February 25, 2021, with no substantive comments or indication they had previously identified National Register eligible subdivisions along the corridor.

A Historic Property Report (HPR) and archaeological records check and reconnaissance survey report were distributed on June 3, 2021. The HPR was prepared by historians with ASC Group,

¹ In their July 15, 2021 and December 21, 2021 letters, SHPO refers to this subdivision as Royal Meadows/Hill Valley Estates. Project consultants and INDOT-CRO have not identified the use of Royal Meadows in plats or covenants for the subdivision. There is no reference to Royal Meadows on the Hill Valley Homeowner's Association website. Therefore, INDOT-CRO will continue to refer to subdivision as Hill Valley Estates.

Inc. who meet the Secretary of the Interior's Professional Qualification Standards. The HPR recommended the following subdivisions were not eligible for listing in the National Register of Historic Places (NRHP): Richards and Landers Mt. Pleasant Subdivision, Wood Creek Estates, Ridge Hill Trails, Hill Valley Estates, and Carefree Subdivision.

In their July 6, 2021, response letter, as revised July 15, 2021, the SHPO stated disagreement with the HPR's recommendations for Richards and Landers Mount Pleasant Subdivision, Ridge Hill Trails Subdivision, and Carefree Subdivision² advising these three subdivisions were eligible for the NRHP, along with two additional subdivisions: Wood Creek Estates and Royal Meadows/Hill Valley Estates³.

In coordination with INDOT-Cultural Resource Office (CRO), the qualified professional consultant prepared an Addendum HPR, which provided additional research and analysis and responded to the points raised in IN-SHPO response letter. The Addendum HPR is enclosed for reference. The Addendum was distributed to consulting parties on November 24, 2021. INDOT-CRO staff followed-up with the IN-SHPO in an email on November 29, 2021, asking for a meeting to discuss these resources as well as the evaluation of post-war subdivisions in general.

The IN-SHPO responded via email on December 2, 2021:

If the meeting for this project is to debate the eligibility of resources, that might not be a productive use of everyone's time. Since Johnson County is in the next stages for the upcoming survey, subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section via desktop survey and on-site visits. Additional meetings may simply result in the recommendation that FHWA ask NPS for a formal determination of eligibility.

INDOT-CRO responded via email on December 13, 2021, acknowledging the value in potentially waiting until after the IN-SHPO had time to review the additional information and requesting that the IN-SHPO share with INDOT-CRO "any information you may have on the Johnson County Survey. References to identification and eligibility determination have been made not just in the email below but also on a couple of other projects that your office has reviewed this year (Des. No. 2100071 & 1800082). It would be really useful to us to understand which subdivisions have been identified county-wide and have already been researched, examined, and determined eligible by the Survey/Register section". INDOT-CRO made the same request during the December 14, 2021, HiPriPro⁴ meeting. The IN-SHPO declined to share the findings from the Johnson County Survey (See meeting summary in appendix).

IN-SHPO's formal comments on the Addendum HPR were received on December 21, 2021. The IN-SHPO continued to disagree with the eligibility recommendations for the subdivisions and advised that the following subdivisions are eligible for the NRHP:

² Initially FHWA/INDOT and IN-SHPO disagreed regarding the eligibility of this subdivision but FHWA/INDOT eventually agreed this resource is eligible.

³ See previous

⁴ High Priority Projects Meeting-a regularly recurring meeting between INDOT and IN-SHPO staff to discuss specific projects and general topics.

Johnson County

Richards and Landers Mt. Pleasant Subdivision-under Criterion A
Wood Creek Estates-under Criteria A and C
Carefree Subdivision-under Criteria A and C

Marion County

Ridge Hill Trails-under Criteria A and C
Royal Meadows/Hill Valley Estates-under Criteria A and C

IN-SHPO's specific opinions for each subdivision are provided below in more detail. Correspondence with SHPO is also attached for reference.

After further consideration, INDOT-CRO agrees with the eligibility of the Carefree Subdivision, as explained later in more detail. However, INDOT-CRO and FHWA continue to assert the remaining four subdivisions are not eligible for listing in the NRHP according to the requirements found in the "Residential Planning and Development in Indiana, 1940-1973" NRHP Multiple Property Documentation Form (MPDF⁵). The MPDF was approved by the Keeper of the NRHP in 2018. IN-SHPO has indicated that the MPDF is the preferred document to reference when evaluating the NRHP eligibility of residential properties constructed between 1940 and 1973 in Indiana, excluding public and multifamily housing, which are not addressed in the MPDF.

Responses to SHPO's December 21, 2021, Letter

In their December 21, 2021, letter, the IN-SHPO provides some general observations on the Addendum HPR's approach to the evaluations and offers a few specific comments. Instead of rebutting or commenting on each SHPO statement, this will focus on the most pertinent and reflect the ongoing overarching themes of the disagreements between SHPO and FWHA / INDOT and establish a contextual understanding to inform the specific subdivision evaluation disagreements that follow.

The December 21, 2021, letter from the IN-SHPO states, "First, many parts of the Addendum HPR were contradictory and the overall methodology presented is not consistent with past guidance" and "Moreover, we observed multiple inconsistencies and contradictory statements within the Addendum HPR." The IN-SHPO offered two specific instances both involving the evaluation for the Richards and Landers Mt. Pleasant Subdivision. These statements will be rebutted specifically in the subdivision eligibility disagreement section that follows. No other examples of inconsistencies or contradictions were noted by IN-SHPO.

The IN-SHPO also states:

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 for an extensive pool

⁵ Found here: [https://www.in.gov/indot/files/ResidentialPlanningandDevelopmentinIndiana%2C1940-1973%20\(1\).pdf](https://www.in.gov/indot/files/ResidentialPlanningandDevelopmentinIndiana%2C1940-1973%20(1).pdf)

of potentially eligible resources. We notice throughout the Addendum HPR 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 Addendum HPR.

This statement may mischaracterize the evaluations and mix the concepts of the subtype characteristics with the significance considerations and registration requirements. The Addendum HPR evaluations first compare the subdivisions to the subtype characteristics to understand how well they typify those traits, but does not state that all characteristics are necessary to be eligible. Once a subtype is identified, the evaluations proceed to apply the significance considerations and registration requirements defined in the MPDF to determine potential significance. The MPDF does provide specific registration requirements, “In order to be eligible for listing, a historic district must generally meet the following requirements...”(274) to which the Addendum HPR adheres. These registration requirements are distinct from determining the subtype characteristics.

Classifying a subdivision as a subtype is the first step in the analysis of whether a subdivision is eligible for listing in the NRHP. As described in *National Register Bulletin 16B: How to Complete the National Register Multiple Property Documentation Form*, “property type analysis is a tool for evaluating related properties.” Type analysis is based on the identification of “physical and/or associative attributes” and may include the identification and analysis of subtypes, which “will be more detailed, and therefore more useful for the evaluation of identified properties” (14). In the case of this MPDF, two primary types are identified: “World War II-Era and Post-War Residential Development” and the “Single-family Residential Dwelling.” Under the former type, five subtypes are identified.

In accordance with the guidelines set forth in *National Register Bulletin 16B*, the associative and physical attributes/characteristics of the development subtypes are related to the areas of historic significance under which a development may be evaluated. The typology itself was constructed with historic significance in mind. Each subtype revolves around historically significant trends, and the attributes are based on these trends. The subtypes are a tool to help guide a determination of significance. Thus, the first step in evaluating a subdivision according to the MPDF is to identify it as a type and subtype, based on the subtype attributes, followed by determining if it has significance under the National Register criteria. Simply being an example of a type is not enough to warrant eligibility. Regarding significance under Criterion A, the MPDF states:

Contextual information must be presented to differentiate a historic district from similar examples under the same theme and demonstrate importance within the appropriate level of significance (local, state, or national) under Criterion A. For example, a historic district may be found to be the first of a particular type of development or a planning model that influenced subsequent developments in the same context.

A historic district eligible under the MPDF is likely to be evaluated under Criterion A in the area of COMMUNITY PLANNING AND DEVELOPMENT in consideration of its contribution to land use, growth, and development within the applicable context or efforts to take advantage of housing provisions or legislation in the establishment of communities (270).

In the discussion of significance under Criterion C, the MPDF states:

In the context of COMMUNITY PLANNING AND DEVELOPMENT, a historic district must reflect, through its physical qualities, important design principles within the established level of significance. It must possess distinctive characteristics of a particular type of development and period and be identifiable as a noteworthy entity compared to others in the same context (272).

Following the guidance in the MPDF, the Addendum HPR identifies the most appropriate property type and applies the registration requirements to determine significance.

SHPO also stated “Several generalizations are repeated throughout the Addendum HPR. The argument that these subdivisions can’t be significant because they are motivated by profit stands out to us.” The Addendum HPR does not make this assertion. Rather, as a specific example, this is how the Addendum HPR refers to the profit aspect:

Judging from various newspaper advertisements, the reason for the planning and establishment of the development was to profit from selling lots and/or building houses (*The Indianapolis Star* 1961a). Hill Valley Estates is not associated with specific initiatives to provide housing to veterans or industrial workers. Hill Valley Estates was no more or less successful in meeting its intended purpose than any other of the vast number of residential subdivisions that arose in this area after World War II (121).

Rather than saying subdivisions can’t be eligible because they were motivated by profit, the evaluation indicates profit is not a determining factor or consideration for significance. The Addendum HPR was pointing out that the other less-profit driven considerations listed in the MPDF, including housing geared toward veterans or WWII industrial workers, did not apply in this case.

The IN-SHPO also stated:

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.

The IN-SHPO's point regarding exceptionalism is a valid statement; however, as supported by the MPDF, just being an example of subtype does not equate to significance:

While all developments of the period can broadly be considered associated with World War II-era and post-war era housing trends, mere occurrence during this period or vague association with residential planning and development trends of the era are not sufficient to warrant eligibility as a historic district. Eligible historic districts must clearly and explicitly demonstrate association with a particular theme or trend that is important in the applicable context (local, state, or national) and the total of its individual components must represent a cohesive, identifiable entity within that particular context (271).

The IN-SHPO makes the following points regarding subdivision ages:

Another concept we noticed while reviewing the Addendum HPR 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.

This statement is inconsistent with the MPDF. The MPDF list of requirements for eligibility includes this: "Developed primarily between 1940 and 1973, with the majority of individual resources and integral landscape-level features (e.g. configuration of the street network) dating to this period of development" (274). In Wood Creek Estates, approximately 65% of the houses were built after 1973. In Ridge Hill Trails, 77% of the houses were built after 1973. While individual properties may fall outside the 1940-1973 window and may contribute to a potential district under certain circumstances, when the vast majority of a subdivision's houses fall outside that time period, a subdivision would generally not be eligible under this property type.

Furthermore, the MPDF explains 1973 as a "distinct break" by stating:

The growth of the national and Hoosier housing markets were steady and remarkable through 1973. In that year, several dramatic events sharply curtailed housing expansion both nationally and locally. Most notably, a severe recession emerged that lasted until 1975-1976, exacerbated by the Oil Embargo of 1973. The impact of the latter on the housing industry was particularly devastating as rising gas prices stunted the growth of the transportation network and the pervasiveness of the automobile culture upon

which suburbanization depended. The resulting sharp decrease in housing starts provides a distinct break, nearly 50 years ago, which serves as a suitable end point for the context (1).

If most of a subdivision's houses were built after 1973 then it would need to meet Criteria Consideration G to be eligible. The MPDF addressed the application of Criteria Consideration G for evaluating properties that extend into the 1970s. Per the MPDF:

For example, a historic district developed over several years may include properties less than 50 years of age and/or have a period of significance extending into the 1970s or beyond. However, such districts need not possess (sic) exceptional significance and thus meet Criteria Consideration G if the majority of properties are more than 50 years of age or the primary period of significance is 50 years or more in the past (291).

The majority of the houses in Wood Creek Estates and Ridge Hill Trails were built after 1973; therefore, following the reasoning spelled out in the MPDF, these subdivisions would have to possess exceptional significance under Criteria Consideration G if they are to be treated as National Register eligible. There is no evidence that these subdivisions exhibit any exceptional importance as is required under Criteria Consideration G (see Addendum HPR).

Specific Subdivision Eligibility Disagreements

The full evaluations are provided in the enclosed Addendum HPR and the comments from SHPO are included in the attached correspondence. The previous section summarized the overarching disagreements between SHPO and INDOT on these evaluations, but there are a couple of key points for each subdivision that are important.

Carefree Subdivision

In the December 21, 2021, letter, the IN-SHPO asserts the Carefree subdivision is eligible under Criteria A and C under Community Planning & Development and Architecture as a Custom Development with assorted architectural styles, curving streets and cul-de-sacs, and other amenities. And the subdivision has easy access to churches or commercial buildings.

While FHWA and INDOT disagree with some of the underpinnings of SHPO's reasoning for Carefree being eligible, it exhibits more of the characteristics expected for an eligible Custom Development. And after further consideration, FHWA and INDOT agree that Carefree meets enough of these criteria that it should be considered an eligible historic district. Nevertheless, the evaluation in the Addendum HPR contains valuable and pertinent information that should be considered for any future discussions of this and other similar subdivisions. In addition, there are references to this subdivision in some of the other discussions outlined here.

Richards and Landers Mt. Pleasant Subdivision

The December 21, 2021, SHPO letter states this subdivision utilizes a grid plan and is located along a major highway providing easy access to the city. Despite the alterations, the IN-SHPO indicated

it retains integrity making it 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.”

In the same letter, the SHPO refers to “multiple inconsistencies and contradictory statements” and states, “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 quoted portion of this statement, is not found in the Addendum HPR as quoted, but may refer to a passage from the Addendum HPR that states: “Given that not quite half of the residential lots had been built on through 1955 shows that the subdivision was not particularly attractive to builders looking to quickly construct housing” (13). Another statement from the Addendum HPR addressing the rate of construction, “Given this fact and the relatively slow build-out of the subdivision, the subdivision did not play an important role in providing economical housing in the readjustment era” (15).

Interpretation of the rate of construction can be subjective, but the statements in the Addendum are not inconsistent or contradictory. The point being made is in the suburban housing market as detailed in the MPDF, 13 years between the platting of the subdivision and when the majority of it had been constructed in 1960 is not a “brief period.” In comparison, over 600 houses were built in the Carefree Subdivision in a span of 9 years between 1967 and 1976. Regardless, this argument is not a critical aspect of the evaluation; it is just part of the Transitional Development characteristic analysis. The length of the subdivision’s build-out raises the question of whether it can truly convey the historical significance of the postwar readjustment period— when builders rushed to meet demand in the aftermath of the war—but the Addendum evaluation does not rest the eligibility argument on this aspect alone.

SHPO also offers this as an example of an inconsistency and/or contradictory statement:

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.

The exact phrase from the Addendum HPR is:

Use and influence of government provisions and standards:

The subdivision has a simple rectangular layout despite having ample room for FHA recommended traffic calming measures such as culs-de-sac. There were no earlier plats or road networks forcing this choice. This subdivision does not demonstrate particular significance in the use of government provisions or standards (16)

The phrase “Use and influence of government provisions and standards” is in the list of considerations for significance in the MPDF (270). SHPO’s paraphrasing adds in “projects” where it doesn’t appear in the Addendum HPR or MPDF in this context. “Projects” as used by SHPO in their letter adds a different context and meaning beyond “government provisions and standards” listed in the MPDF. The Addendum HPR is applying this latter concept from the

MPDF to government programs specifically targeting housing development. Ultimately, the MPDF does not include proximity to major roadways as a consideration of significance. Therefore, the proximity to and view of SR 37 does not have bearing on this subdivision's NRHP eligibility.

This subdivision has some of the characteristics laid out in the MPDF of the Transitional Development subtype, but it is missing some of the key traits. At more than four miles from Greenwood's center, the neighborhood is not located within or adjacent to the community core as outlined in the MPDF (267). As the IN-SHPO points out, subdivision utilizes a grid plan. The MPDF states, "Transitional Subdivisions were typically laid out on a grid and made use of existing plats, street layout and municipal services...." (267) and goes on to state this subtype uses "traditional street networks but incorporating modern housing and emergent concepts of planning and subdivision design...." (267). The Richards and Landers Mt. Pleasant subdivision did not use a traditional street network. It was a wholly new and isolated neighborhood, and the use of a grid plan reflects traditional design, but there is no evidence of emergent concepts of planning and subdivision design nor does it make use of existing plats, street layout and municipal services.

Beyond the absence of some of the more key characteristics of the Transitional Development subtype, the no evidence was found that this subdivision contributed to the land use, growth, and development within the applicable context or efforts to take advantage of housing provisions or legislation in the establishment of communities as defined in the MDPF as a consideration for significance under Criterion A.

Wood Creek Estates

The December 21, 2021, IN-SHPO letter argues the Wood Creek Estates is eligible under Criteria A and C under Community Planning & Development and Architecture as a Custom Development mostly consisting of ranches, stacked ranches, bi-levels, and split-levels built in the mid-1970s. The subdivision has curving streets and cul-de-sacs is near churches and commercial development.

As noted above, sixty-five percent (65%) of the houses in this subdivision were not constructed until after 1973. The research does not indicate the subdivision made a contribution to land use, growth, and development within the applicable context as defined in the MPDF for Criterion A significance. The SHPO's contention that houses constructed after the endpoint of the MPDF timeframe in 1973 may be contributing to a potential district is valid, but in this case, a majority of the subdivision was outside the MPDF defined timeframe and there is no evidence that it contributed to the trends laid out in the MPDF.

Other factors contributing to the ineligibility of Wood Creek Estates include the fact the northern and southern sections of the subdivision are not connected by an interior road. In addition, a circa 2000 subdivision known as Abbey Villa is situated between the northern and southern sections of Wood Creek Estates, a separation that goes against FHA guidelines of planning a cohesive subdivision. Further, the MPDF states that, "By nature, evaluation should focus on an identifiable development (e.g., a particular subdivision or

planned development) defined by a common context and cohesive physical characteristics” (269).

As a means of comparative analysis, two other Custom Developments were considered as a comparison in the Addendum HPR, Colonial Meadows and Meridian Woods Park. Both subdivisions possess a greater degree of architectural variety, emphasized an integration of the neighborhood with natural features in advertising and were built primarily within the timeframe of the MPDF as opposed to Wood Creek Estates.

Carefree Subdivision

In the December 21, 2021, letter, the IN-SHPO asserts the Carefree subdivision is eligible under Criteria A and C under Community Planning & Development and Architecture as a Custom Development with assorted architectural styles, curving streets and cul-de-sacs, and other amenities. The subdivision also has easy access to churches or commercial buildings.

After further consideration, FHWA and INDOT-CRO agree that Carefree meets enough of these criteria that it should be considered an eligible historic district. Nevertheless, the evaluation in the Addendum HPR contains valuable and pertinent information that should be considered for any future discussions of this and other similar subdivisions.

Ridge Hill Trails

In December 21, 2021, letter, the IN-SHPO stated their opinion the Ridge Hill Trails and Royal Meadows subdivisions are eligible for the NRHP. They consider the Ridge Hill Trails a Custom Development on a curvilinear plan that is a cohesive, uniform and intact “entry-level” Custom Development. The letter indicted the neighborhood is eligible under Criteria A and C under Community Planning & Development and Architecture. The letter went on to state “*that that Custom Developments do not have to be architect-designed alone, they can be Custom by way of the subdivision builder.*”

Similar to Wood Creek Estates, the majority of houses in the subdivision were built after the MPDF end point of 1973. Per the Addendum HPR, the subdivision was platted in five sections, between 1969 and 1977 with plats 3, 4 and 5 not being platted until 1974 resulting in three of the subdivision’s five sections not being platted until after the end point of the MPDF. Seventy-seven percent (77%) of the subdivision’s houses were built after 1974.

Although the IN-SHPO classified it as an “Entry-level” Custom Development, “Entry-level Custom Development” does not appear in the MPDF and appears the IN-SHPO is expanding upon the MPDF at their discretion. To that point, there are many ways in which working-class or lower-middle-class neighborhoods could be considered eligible for the NRHP per the registration guidelines described in the MPDF, such as an association with a particular ethnic group or factory or as a particularly good example of a Tract or Transitional development.

The characteristics of the Custom Development type, as described in the MPDF, were more difficult to achieve within less affluent neighborhoods. The presence of amenities, variation, and

architect-designed or custom-built homes typically required more resources than were available to working-class or lower-middle-class communities. According to the MPDF, Custom Developments were targeted at a new type of “sophisticated consumer” and were “tailored to meet a variety of needs and preferences.” They are “more distinguished in their design, layout, and configuration than Tract Developments and are typically carefully crafted to accommodate variations in topography, natural settings, or manmade features such as lakes and golf courses, which became critical selling points.” Because of this, they were “more expensive to develop than a Tract Subdivision” (268). As the MPDF states, “Custom Developments spanned a variety of economic ranges, although they were most typically associated with middle-class and upper-class populations” (250).

The MPDF indicates that it is less likely—though not impossible—for a working-class or lower-middle-class neighborhood to possess the characteristics necessary to be considered a good example of the Custom Development subtype.

Moreover, under Criterion C specifically, the Ridge Hill Trails neighborhood lacks the necessary cohesion; an important consideration in the MPDF. The Addendum HPR points out the Ridge Hill Trails Subdivision only uses cul-de-sacs in the later sections of the neighborhood. The differences in street styles between the younger and older sections result in a different feeling between them making the more recently platted sections 3 and 4 ones seem almost like a different subdivision than the earlier platted sections one and two that do not have cul-de-sacs (93).

Hill Valley Estates

In the SHPO letter dated December 21, 2021, they argue the Royal Meadows/Hill Valley Estates is eligible under Criteria A and C under Community Planning & Development and Architecture as an example of a Custom Development with a wide variety of types and styles and curvilinear streets with sidewalks and curbs. The SHPO states it has integrity as an intact “entry-level” Custom Development. Please refer to the Ridge Hill Trails response above for a discussion of “entry-level” Custom Developments.

Hill Valley Estates is a sprawling subdivision including 1,006 homes built in 29 sections, developed in successive plats from 1960 through 1978. The portion of the subdivision within the project’s APE is Section 28 which was not platted until 1977. The houses within this section were primarily built in the 1980s.

Due to the broad timeframe and sprawling size of the subdivision, there is enough variations in house types and layout that identifying this as a single, cohesive entity would be difficult. For instance, US 135, a five-lane road extends through the subdivision, separating Sections 1-8 from the western sections. Due to the successive development by different builders, the sections exhibit varying characteristics, including differing sidewalk installation practices (some sections with sidewalks on each side of street, while others have only sidewalks on one side), housing types and tree density. As an example, West Valley View Drive in Section 22 features a more uniform building stock with a stretch of split-levels that appear more as tract housing than that of other sections of the subdivision.

Due to the size of the subdivision, with only a small portion within the APE, INDOT-CRO acknowledges that there may be sections of the subdivision that are eligible for the National Register, but that evaluation is beyond the scope of this project. Section 28 contained within the APE should not be considered contributing to a district as it was not platted until 1977 well outside the MPDF timeframe. While a continuation of the overall successive plats of the Hill Valley Estates, many of the houses within this 1977 plat were not constructed until the mid- 1980s.

Conclusion

The MPDF was developed, in part by the IN-SHPO, as a tool to evaluate post-WWII subdivisions and provides valuable information regarding subtypes of housing developments found in Indiana and guidance regarding how to assess a subdivision's significance. The IN-SHPO has directed INDOT and other to use the MPDF as the primary reference when evaluating the eligibility of post-WWII subdivisions for eligibility for listing on the NRHP. However, the IN-SHPO comments regarding the resources outlined in above seem to espouse the addition of new subtypes (e.g. "Entry-level Custom Developments") and, in some instances, run counter to the guidance in the MPDF (e.g. regarding construction dates for subdivisions considered as post-WWII resources). These specific disagreements reflect a larger pattern with IN-SHPO's interpretation and application of the MPDF that will have significant implications for all future evaluations involving Post-WW II subdivisions.

Specifically, FHWA and INDOT disagree, for the reasons summarized above, with the IN-SHPO's assessment that the 1) Richards and Landers Mt. Pleasant Subdivision; 2) Wood Creek Estates; 3) Ridge Hill Trails; and 4) Hill Valley Estates are eligible for listing on the NRHP. To aid in the review of these properties, relevant information is enclosed including: Addendum HPR report (including maps and pictures) and the correspondence between FHWA, INDOT-CRO and the IN-SHPO.

FHWA is asking the Keeper to please review this letter and attached information and make a determination of eligibility. Please feel free to reach out with and questions you may have. Regardless of your finding, we will be grateful for a detailed explanation of the basis for the decision, which will be helpful in the evaluation of similar properties in the future. The FHWA point of contact for this request is Karstin Carmany-George at 317-226-5629 or k.carmanygeorge@dot.gov.

Sincerely,

JERMAINE
R HANNON

Digitally signed by
JERMAINE R HANNON
Date: 2022.05.09
13:11:29 -04'00'

Jermaine R. Hannon
Division Administrator

Attachments:

Attachment A: SHPO Response Letter (December 21, 2021)

Attachment B: Email Correspondence Between INDOT-CRO and SHPO (Various-November-December 2021)

Attachment C: Summary of December 21, 2021 HiPriPro Meeting

Attachment D: Addendum to Historic Property Report (November 24, 2021)

cc: David Clarke, FHWA Federal Preservation Officer
Karstin Carmany-George, FHWA Indiana Division
Beth McCord, Indiana Department of Historic Preservation and Archaeology
Anu Kumar, Indiana Department of Transportation



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places National Park Service

Name of Property: County Line Road Added Travel Lanes Project

Location: County Line Road, Johnson and Marion Counties **State:** IN

Request submitted by:

Jermaine R. Hannon
Division Administrator
US Department of Transportation/Indiana Division
575 N Pennsylvania St, Room 254
Indianapolis, IN 46204

Date received: 5/11/2022 **Additional information received**

Opinion of the State Historic Preservation Officer:

☒ **Eligible** ☐ **Not Eligible** ☐ **No Response** ☐ **Need More**
information

Comments:

This project includes four properties: Richards and Landers Mt. Pleasant Subdivision, Wood Creek Estates, Ridge Hill Trails, and Hill Valley Estates.

The Secretary of the Interior has determined that this property is:

☐ **Eligible** ☐ **Not Eligible** ☐ **Need More**
Information

Applicable criteria:

Comment:

The basis for evaluation of these districts is the Multiple Property Documentation Form "Residential Planning and Development in Indiana, 1940-1973", which was submitted to the national Register in 2018 and accepted as a vehicle for evaluating and nominating resources on March 5, 2018.

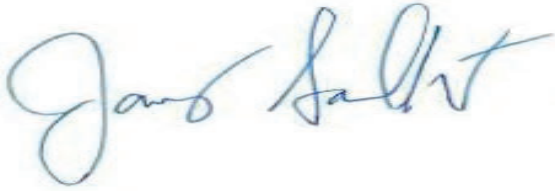
Please refer to the individual property notification forms for details.

Mt. Pleasant Subdivision: Not Eligible
Wood Creek Subdivision: Not Eligible

Ridge Hill Trails: Not Eligible as submitted – should re-evaluate Plat 1
Hill Valley Estates: Eligible property with modified boundaries; Portion in APE not eligible

For: Keeper of the National Register

Date

A handwritten signature in blue ink, appearing to read "Jim Gabbert". The signature is written in a cursive, flowing style.

Jim Gabbert, Historian
National Register of Historic Places
6/27/2022



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places National Park Service

Name of Property: County Line Road Added Travel Lanes **Project:** Richards and Landers Mt. Pleasant Subdivision

Location: Johnson County

State: IN

Request submitted by:

Jermaine R. Hannon
Division Administrator
US Department of Transportation/Indiana Division
575 N Pennsylvania St, Room 254
Indianapolis, IN 46204

Date received: 5/11/2022 **Additional information received**

Opinion of the State Historic Preservation Officer:

☒ **Eligible** ☐ **Not Eligible** ☐ **No Response** ☐ **Need More**
information

Comments:

SHPO supports eligibility of the district as an example of a “Transitional Development” as defined in the Multiple Property Documentation Form (MPDF) for Residential Planning and Development in Indiana, 1940-1973. The SHPO opinions relied on use of this MPS as the basis for evaluating the affected properties. SHPO opinion cites the grid patterns of the development and the mixture of American small houses and ranch houses and the plat date as aspects of the subtype that the subdivision demonstrates.

The MPDF defines these neighborhoods as typically platted before 1955, and *usually* located within or adjacent to the community core. Transitional Subdivisions were *typically* laid out on a grid and made use of existing plats, street layout, and municipal services.

The SHPO justification also includes the location of the subdivision along a major roadway (Highway 37) as further evidence of its significance. This location may serve as a substitute for the “usually located within or adjacent to the community core” characteristic since the easy access to a major transportation route can substitute for the proximity of being located adjacent to established areas of in the “first-tier growth area”.

The Secretary of the Interior has determined that this property is:

☐ Eligible

☒ Not Eligible

☐ Need More
Information

Applicable criteria: N/A

Comment:

While the MPDF does allow for some flexibility in the definition of the subtypes – using words like “usually” and “typically” – there is still the basic understanding that some level of significance must be demonstrated. It is not sufficient for a subdivision to simply be an example of one of the property types, some effort must be made to place it in its appropriate context. The SHPO response letter to the Addendum Historic Property Report, which serves as the basis for the Agency’s opinions, makes reference to a pending survey of Johnson County and that the SHPO’s opinions for the districts that are part of this project are based on preliminary research and remote survey. While this is a good start, there might not be sufficient information gleaned from this preliminary work to establish the necessary context. This area of Marion/Johnson County saw explosive growth in the 1960-80 period (and beyond). The MPDF suggests that “in all instances, specific links must be drawn between the development of residential architecture in the state of Indiana, local homebuilding practices, and development trends in the particular community in which the property is located, and trends within the particular context under which the property is nominated” (F-265). This level of analysis is missing from the SHPO opinion. There is no discussion of planning, zoning, or other governmental incentives or policies that might have influenced development in this area.

It appears from aerial images that the Mt. Pleasant subdivision was an outlier, not really a pioneer. The subdivision took a relatively long span of time to fill out. Casting aside the general requirements for a Transitional Development to be close/adjacent to an established core, in order for it to be considered significant under Criterion A, one would expect that its plat and eventual build-out would be over a relatively short time, demonstrating the need and popularity of the development. Mt. Pleasant saw slow, steady growth after the initial first 5 years after the plat, hardly evidence that the subdivision was an important response to the housing shortage of the post WWII era. So, absent an overall contextual framework for suburban development in the Greenwood/Southport area and absent any obvious evidence that this was an influential, pioneer development that might have served as a magnet for subsequent subdivisions/amenities/development, we conclude that the Richards and Landers Mt. Pleasant Subdivision is **not eligible** for the National Register.

For: Keeper of the National Register / Date



Jim Gabbert, Historian
National Register of Historic Places
6/27/2022



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places National Park Service

Name of Property: County Line Road Added Travel Lanes Project: Wood Creek Subdivision

Location: Johnson County

State: IN

Request submitted by:

Jermaine R. Hannon
Division Administrator
US Department of Transportation/Indiana Division
575 N Pennsylvania St, Room 254
Indianapolis, IN 46204

Date received: 5/11/2022 **Additional information received**

Opinion of the State Historic Preservation Officer:

☒ **Eligible** ☐ **Not Eligible** ☐ **No Response** ☐ **Need More information**

Comments:

SHPO opinion is that this meets the registration requirements of the Residential Planning and Development in Indiana, 1940-1973 MPS under Criteria A & C, as a "Custom Development" subtype. "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."

The MPDF puts the timeframe for Custom Developments as c. 1950-1973, and provides aspects of this type of development that are *typically* (but not always) present. These include smaller size developments, use of natural and man-made features, and a variety of custom-built homes, designed by architects or builders. Layout and design are important aspects, including lot size and setbacks.

The Secretary of the Interior has determined that this property is:

☐ **Eligible** ☒ **Not Eligible** ☐ **Need More Information**

Applicable criteria: N/A

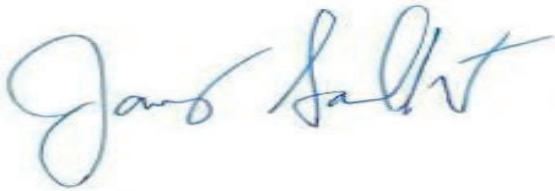
Comment:

The MPDF is very well written, and is particularly clear in its registration requirements. The end of the thematic era for this MPS is 1973, and this end is well-thought out and well-justified in the MPDF based on conditions in the housing market.

The SHPO's opinion that the date range is meant to reflect a general timeframe in which these subdivisions were primarily built, and that the "National Park Service will accept beginning and end dates outside the dates listed in the MPDF with adequate documentation...". While it is true that the NPS will accept date ranges that exceed the MPDF range by a few years, this would be in cases where our guidance in Bulletins 15, 16, and *Historic American Suburbs* are followed – that is, where development overlaps the stated period, but where the preponderance of resources fall within the period. As noted on page F-274, the MPDF acknowledges this, but still requires that "the majority of resources and integral landscape-level features" date to the period of development.

Wood Creek Estates was platted in 1972, but the vast majority of resources within the development post-date 1973. Despite the plat being over 50 years old, the build-out occurred within the last 50 years, which means that the development would have to satisfy Criteria Consideration G. There is no justification for exceptional importance provided for this subdivision, therefore based on the evidence available, the Keeper has determined that Wood Creek Estates is **not eligible** for listing in the National Register of Historic Places.

For: Keeper of the National Register / Date

A handwritten signature in blue ink, appearing to read "Jim Gabbert". The signature is fluid and cursive, with the first name "Jim" being more prominent than the last name "Gabbert".

Jim Gabbert, Historian
National Register of Historic Places
6/27/2022

WASO-28



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places National Park Service

Name of Property: County Line Road Added Travel Lanes Project: Ridge Hill Trails

Location: Marion County

State: IN

Request submitted by:

Jermaine R. Hannon
Division Administrator
US Department of Transportation/Indiana Division
575 N Pennsylvania St, Room 254
Indianapolis, IN 46204

Date received: 5/11/2022 **Additional information received**

Opinion of the State Historic Preservation Officer:

☒ **Eligible** ☐ **Not Eligible** ☐ **No Response** ☐ **Need More**
information

Comments:

SHPO opinion is that this meets the registration requirements of the Residential Planning and Development in Indiana, 1940-1973 MPS under Criteria A & C, as a "Custom Development" subtype. "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."

The Secretary of the Interior has determined that this property is:

☐ **Eligible** ☒ **Not Eligible** ☒ **Need More Information**

Applicable criteria: N/A

Comment:

The MPDF is very well written, and is particularly clear in its registration requirements. The end of the thematic era for this MPS is 1973, and this end is well-thought out and well-justified in the MPDF based on conditions in the housing market.

The SHPO's opinion that the date range is meant to reflect a general timeframe in which these subdivisions were primarily built, and that the "National Park Service will accept

beginning and end dates outside the dates listed in the MPDF with adequate documentation...". While it is true that the NPS will accept date ranges that exceed the MPDF range by a few years, this would be in cases where our guidance in Bulletins 15, 16, and *Historic American Suburbs* are followed – that is, where development overlaps the stated period, but where the preponderance of resources fall within the period. As noted on page F-274, the MPDF acknowledges this, but still requires that “the majority of resources and integral landscape-level features” date to the period of development.

The MPDF suggests that “in all instances, specific links must be drawn between the development of residential architecture in the state of Indiana, local homebuilding practices, and development trends in the particular community in which the property is located, and trends within the particular context under which the property is nominated” (F-265 and 270). This level of analysis is missing from the SHPO opinion. There is no discussion of planning, zoning, or other governmental incentives or policies that might have influenced development in this area.

Ridge Hill Trails was platted in sections beginning in 1969 with the fifth plat being filed in 1977. When viewed as a whole entity, the great majority of the Ridge Hills Subdivision was platted and built-out after the end of the 1973 end date for the MPS. Exceptional importance for the entirety of Ridge Hill Trails is not claimed nor is it demonstrated. The Keeper has determined that Ridge Hill Trails is **not eligible** for listing in the National Register of Historic Places.

* However, the Keeper also suggests re-evaluation of Plat 1 as a stand-alone district. The MPDF, when discussing alterations and other considerations (pages 276-277), does allow for “Diminished integrity of associated plats in a related development”: Many developments are comprised of multiple plats...When evaluating the NRHP eligibility of a multi-plat development, the *character* (emphasis mine) of the plats and their relationship to and impact on one another must be carefully evaluated... Emphasis should be placed on the entirety of related components in a district that share a common context and physical characteristics unless there is a demonstrated reason why this is not practical or prudent.”

The look and feel of Plat 1 is differentiated from the subsequent plats in the size of lots and the qualities of the houses. The Keeper suggests that this plat be re-evaluated in keeping with the spirit of the MPDF.

For: Keeper of the National Register / Date



Jim Gabbert, Historian
National Register of Historic Places
6/27/2022



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, D.C. 20240

DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places National Park Service

Name of Property: County Line Road Added Travel Lanes Project: Hill Valley Estates

Location: Marion County

State: IN

Request submitted by:

Jermaine R. Hannon
Division Administrator
US Department of Transportation/Indiana Division
575 N Pennsylvania St, Room 254
Indianapolis, IN 46204

Date received: 5/11/2022 **Additional information received**

Opinion of the State Historic Preservation Officer:

☒ **Eligible** ☐ **Not Eligible** ☐ **No Response** ☐ **Need More information**

Comments:

SHPO opinion is that this district (also referred to as Royal Meadows) meets the registration requirements of the Residential Planning and Development in Indiana, 1940-1973 MPS under Criteria A & C, as a "Custom Development" subtype. "It is a good example of a Custom Development composed of a variety of styles and types (ranch, bi-level, split-level, stacked ranch) with Neo-Eclectic and Mansard details among others."

The Secretary of the Interior has determined that this property is:

☒ **Eligible** ☐ **X* Not** ☐ **Need More Information**

Eligible Applicable criteria: Criterion A

Comment:

Hill Valley Estates has 29 sections platted between 1960 and 1978. It is expansive, consisting of over 1000 houses. As with Wood Creek Estates and Ridge Hill Trails, Much of the built environment for the district post-dates the 1973 end date, especially in the area contained within the APE of the project.

The historic development of the proposed district seems to have come in three stages – Section 1-15 developed by the Hill Valley Development Corporation (except for Section

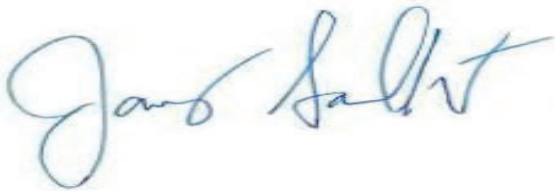
7C); the Yeager Contractor's development of Sections 16-27 and then other, smaller developers in Sections 7C, 28, and 29.

It is unclear from the information presented if the Hill Valley and Yeager developments were considered a continuation of the same, initial development but there is definitely a continuation of the look and feel of the houses in Sections 1-27. There is, however, a subtle shift in the look and feel the houses in Section 28. Sections 29 and 7C are disconnected from the rest of the development; there are no internal roadways connecting them.

The Hill Valley Estates does appear to meet the registration requirements of the MPDF under Criterion A (Community Planning & Development), although the "Custom Development" versus "Tract Development" lines are blurred and we feel that it better falls into the "Tract Development" subtype, despite the later date of some of the plats. However, we do not believe that the boundaries as chosen are appropriate. We believe that Sections 7C, 28, and 29 are inappropriately attached to this large development (despite belonging within the purview of the HOA). The development, especially the initial plats 1-17, broke with the grid pattern developments that had been constructed immediately to the north. The development utilized new ideas of residential planning and stood out as a distinctive entity along this southern portion of the county. The later, Yeager plats (15-27) continued that development with common lot sizes, curved streets, and uniform setbacks.

Therefore, it is the decision of the Keeper that Hill Valley Estates is **eligible** for inclusion in the National Register of Historic Places under Criterion A, but that *sections 7C, 28, and 29 are **not eligible** as part of that district.

For: Keeper of the National Register / Date

A handwritten signature in blue ink, appearing to read "Jim Gabbert". The signature is fluid and cursive, with the first name "Jim" being more prominent than the last name "Gabbert".

Jim Gabbert, Historian
National Register of Historic Places
6/27/2022

WASO-28



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-ES
Indianapolis, Indiana 46204

PHONE: (855) 463-6848

Eric Holcomb, Governor
Michael Smith, Commissioner

January 17, 2023

This letter was sent to the listed parties.

RE: County Line Road Added Travel Lanes Project; Effects (Des. No. 2002553; DPW Project ST-45-067; DHPA Project 27053)

Dear Consulting Party,

The City of Indianapolis Department of Public Works, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553).

This letter is part of the Section 106 review process for this project. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic and archaeological properties. We are requesting comments from you regarding the possible effects of this project. Please use the above Des. Number and project description in your reply and your comments will be incorporated into the formal environmental study.

A Section 106 early coordination letter was distributed on February 16, 2021. In addition, a letter distributed on June 3, 2021, notified consulting parties that a historic property report (HPR) and an archaeology report were available for review and comment. A letter distributed on November 24, 2021, notified consulting parties that an addendum HPR was available for review and comment. In addition, a letter distributed on December 21, 2021, notified consulting parties that an addendum archaeology report was available for review and comment.

The proposed undertaking is on County Line Road, and begins 0.30 mile west of Morgantown Road and extends east to State Road (SR) 135/Meridian Street in Marion and Johnson counties, Indiana. It is within the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Maywood USGS topographic quadrangle, in Sections 21, 22, 23, 26, 27, and 28, Township 14 North, Range 3 East. The project area can be viewed online at <https://arcg.is/jqueP> (the Des. No. is the most efficient search term once in the CRO – Public Web Map App).

County Line Road is classified as a two-lane primary arterial roadway through the majority of the project corridor. The road expands to five lanes (two lanes in each direction with a turning lane to Meridian Street) between South Illinois Street and SR 135. The majority of the project area does not have pedestrian facilities, curb and gutter, or shoulders. Sidewalks, curb and gutter, and shoulders are only associated with the five lane section of County Line Road between South Illinois Street and Royal Meadow Drive.

There are two major intersections along County Line Road within the project limits: Morgantown Road and Railroad Road/Peterman Road. The Morgantown Road intersection is controlled by a traffic signal and has left turn lanes in all directions. There is a steep hill on County Line Road just west of this intersection, with an existing roadway grade of approximately 9 percent.

The Railroad Road/Peterman Road intersection is controlled by a 4-way stop sign, with a single approach lane from all four directions. The Indiana Railroad has a single-track rail line immediately adjacent to Railroad Road/Peterman Road, with an at-grade crossing of County Line Road less than 50 feet west of the intersection. The crossing has overhead flashers but no gates.

The existing structure over Pleasant Creek Run (Structure No. 49-4503F) is approximately 650 feet east of the Morgantown Road intersection. It is a 3-span concrete box beam bridge approximately 135 feet in length. The second existing structure over Buffalo Creek (Structure No. 49-4510F) is located just west of Leisure Lane on County Line Road. It is a 3-span reinforced concrete slab approximately 81 feet in length.

The proposed project includes County Line Road being expanded to a five-lane road (two 11-foot lanes in each direction and a 13-foot two-way left turn lane) with a 10-foot multi-purpose trail on the north side, 6-foot grass buffers on either side and a 6-foot sidewalk on the south side of the roadway. The two existing bridges will also be replaced to accommodate the additional travel lanes. The proposed bridge structures will accommodate the proposed roadway with the only modification to the typical section being that two-foot-wide concrete buffers will replace the grass buffers within the bridge structure limits. The project will also construct stormwater detention, enclosed stormwater system, and address the sharp vertical curve at Morgantown Road. In addition, the project was amended to include additional areas due to proposed changes to the project footprint; namely, the construction of a connector road between Mount Pleasant South Street and N. Bluff Road, and additional drainage areas along Railroad Road.

The purpose of the County Line Road Project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor. The need for this project is due to existing and future capacity restrictions as the projected traffic demands will exceed the capacity of the existing two-lane configuration. Additionally, there are no pedestrian or bicycle facilities associated with the existing roadway which is in a high density residential area.

HNTB is under contract with the City of Indianapolis to advance the environmental documentation for the referenced project. ASC Group, Inc. has been subcontracted to complete the Section 106 documentation for the project.

In accordance with 36 CFR 800.2 (c), you were invited to become a consulting party as part of the Section 106 process, or you are hereby invited to become a consulting party as part of the Section 106 process. Entities that have previously accepted consulting party status—as well as additional entities that are currently being invited to become consulting parties—are identified in the attached list.

The Section 106 process involves efforts to identify historic properties potentially affected by the undertaking, to assess the undertaking's effects and to seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. For more information regarding the protection of historic resources, please see the Advisory Council on Historic Preservation's guide: *Protecting Historic Properties: A Citizen's Guide to Section*

The Area of Potential Effects (APE) is the area in which the proposed project may cause alterations in the character or use of historic resources. The APE contains no resources listed in the National Register of Historic Places (NRHP).

A historian who meets the Secretary of the Interior's Professional Qualification Standards identified and evaluated above-ground resources within the APE for potential eligibility for the NRHP. As a result of the historic property identification and evaluation efforts, three above-ground resources are recommended as eligible for listing in the NRHP: Carefree Subdivision; Ridge Hill Trails, Plat 1; and the John Sutton House, 988 N. Bluff Road.

With regard to archaeological resources, an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards identified a total of seven sites within the project area. As a result of these efforts, sites 12Ma1075, 12Ma1076, 12Ma1077, 12Ma1078, 12Jo0736, and 12Jo0737 and site 12Ma1082 were recommended not eligible for listing in the NRHP and no further work is recommended.

An Addendum to the HPR was distributed to consulting parties by letter dated November 23, 2021. This Addendum assessed the NRHP-eligibility of the five subdivisions identified by the Indiana State Historic Preservation Office (SHPO) in its review of the HPR, as well as above-ground cultural resources within areas added to the project footprint for the construction of a connector road and for additional drainage areas along County Line Road. The Addendum recommended one additional property as eligible, the John Sutton House, but continued to recommend that the five subdivisions are not eligible for listing in the NRHP. The SHPO responded to the Addendum to the HPR by letter dated December 21, 2021, and reiterated its recommendation that the five subdivisions (Richards and Landers Mt. Pleasant Subdivision; Wood Creek Estates; Carefree Subdivision; Ridge Hill Trails; and Royal Meadows/Hill Valley Estates) are eligible for inclusion in the NRHP.

On February 9, 2022, INDOT-Cultural Resource Office (CRO) sent documentation to the Indiana Division of the FHWA regarding the eligibility of the five residential subdivisions listed above. The letter requested that, if appropriate, the information be forwarded to the FHWA Federal Preservation Officer for review. In that letter, INDOT-CRO agreed with the recommendation of eligibility for the Carefree Subdivision.

The Indiana Division of FHWA submitted a letter and documentation to the Keeper of the National Register of Historic Places by letter dated May 9, 2022. This letter requested that the Keeper provide a determination of eligibility for the remaining four subdivisions (Richards and Landers Mt. Pleasant Subdivision; Wood Creek Estates; Ridge Hill Trails; and Hill Valley Estates). The documentation noted that the subdivisions were all built in the period following World War II and are referred to as post-World War II residential resources.

Determination of Eligibility Notifications dated June 27, 2022, were received from the office of the Keeper of the National Register. In summary, the Determinations of Eligibility for the four subdivisions pursuant to the Notifications are:

Mt. Pleasant Subdivision: Not Eligible
Wood Creek Subdivision: Not Eligible

Ridge Hill Trails: Not Eligible as submitted – should re-evaluate Plat 1

Hill Valley Estates: Eligible property with modified boundaries; portion in APE not eligible

For purposes of Section 106 for this project, the Ridge Hill Trails Plat 1 is considered eligible for the NRHP. As a whole, Ridge Hill Trails consists of five plats recorded between 1969 and 1977, with a total of 213 lots. Of the houses in the subdivision, 77 percent were built after 1974 and are less than 50 years of age. Plat 1 of Ridge Hill Trails (1969) has lots that are large and irregularly sized, but generally one acre, and the plat follows the contours of the hilly terrain in this area. The lots in Plats 2–5, platted between 1972 and 1977, are smaller and more uniform in size, but generally one-half acre, and the terrain is relatively flat. Homes in Plat 1 of Ridge Hill Trails are characterized by a notable amount of variety, including Builder Modern, Massed Two-story, and Neo-Tudor, as well as ranch houses, while those in the subsequent plats are mostly ranch house variants. A 1972 aerial photograph of the subdivision shows the presence of 14 houses in Plat 1, while just 5 houses are located in Plat 2, and the remainder of the subdivision had not yet been platted.

Ridge Hill Trails as a complete subdivision was recommended as not eligible for the NRHP due to the majority of the houses being constructed outside the time frame for Custom Development (1950-1973) outlined in the Multiple Property Documentation Form (MPDF) NRHP listing for *Residential Planning and Development in Indiana, 1940-1973*. The subdivision also was recommended not eligible due to the distinct difference between Plat 1 and the later plats of the subdivision in regard to lot sizes and house styles, thus the subdivision lacks cohesion in design. The subdivision also was recommended not eligible due to lack historical significance in the area of post-World War II suburban residential development. However, the Keeper of the National Register suggested that Plat 1 be re-evaluated as a standalone historic district due to the difference in look and feel of Plat 1 compared to the later plats in regard to lot size and the quality of the house.

Characteristics of the Custom Development type as given in the MPDF include the following that are pertinent to Plat 1 of Ridge Hill Trails, but not the later plats: “typically carefully crafted to accommodate variations in topography, natural settings, or manmade features...”; “typically exhibit more variation than housing stock associated with Transitional and Tract Developments”; and “Ranch houses, Split-levels, Bi-levels, and Massed Two-story houses are common, as are Contemporary, Builder Modern, and Neo-Eclectic dwellings.” Plat 1, like the rest of the subdivision lacks a direct relationship to specific trends such as the growth of bedroom communities, provisions for veterans’ or minority housing, or community planning; does not have a significant relationship to other contemporaneous developments; does not significantly display the use and influence of government provisions or standards, community planning efforts, zoning, local building codes, or other regulations; does not use innovative practices or methods; does not have a significant place in a developer’s portfolio; and/or does not influence other development initiatives or spur associated development. However, Plat 1 in containing varied house styles on large irregularly-shaped lots and taking advantage of hilly terrain for maximum exploitation of the natural landscape, offers an exceptional example of the Custom Development subdivision type in comparison to the other subdivisions observed in the vicinity, embodying the distinctive characteristics of the type under Criterion C. Plat 1 of Ridge Hill Trails meets the requirements for eligibility for listing in the NRHP.

Following the receipt of the Determinations of Eligibility from the Keeper of the National Register, HNTB commenced final plan development for the project. During this process, several areas of permanent or temporary right-of-way to be acquired were identified which have not previously been subject to archaeological investigation. A total of 3.707 acres of permanent right-of-way are located outside of the previously surveyed area, and a total of 19.19 acres of temporary right-of-way are located outside of the

previously surveyed area. The largest of these areas is an agricultural field east of Pleasant Run, but also includes land adjacent to the proposed connector road at Bluff Road and adjacent to Morgantown Road south of County Line Road. These areas are all located within the existing APE for above-ground resources, and no additional investigation for such resources will be needed.

An addendum archaeological report will be prepared, and additional coordination will be conducted with the Tribes and SHPO if additional archaeological sites are identified. If any newly identified sites are identified and determined eligible for listing in the NRHP, then the Assessment of Effects report will be revised as needed to address the additional resources.

The Assessment of Effects report is available for review in IN SCOPE at <http://erms12c.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). You are invited to review these documents and to respond with comments on any historic resource impacts incurred as a result of this project so that an environmental report can be completed. We also welcome your related opinions and other input to be considered in the preparation of the environmental document. If a hard copy of the materials is needed, please respond to this email with your request within seven (7) days.

Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party or if you have not previously accepted consulting party status and you do not respond to this letter, you will not be included on the list of consulting parties for this project and will not receive further information about the project unless the design changes.

For questions concerning specific project details, you may contact Douglas Terpstra of ASC Group, Inc. at 614-268-2514 or dterpstra@ascgroup.net. All future responses regarding the proposed project should be forwarded to ASC Group, Inc. at the following address:

Douglas S. Terpstra
Principal Investigator – Architectural Historian
ASC Group, Inc.
800 Freeway Drive North, Suite 101
Columbus, OH 43229
dterpstra@ascgroup.net

Tribal Contacts please respond to INDOT's Acting Tribal Liaison, Matt Coon at mcoon@indot.in.gov (317-697-9752) with any responses pertaining to this project including to provide INDOT/Indiana FHWA additional information about Tribal resources/concerns and questions/comments regarding cultural resources. The FHWA point of contact is Kari Carmany-George at K.CarmanyGeorge@dot.gov (317-226-5629).

Sincerely,



Matthew S. Coon, Acting Manager
Cultural Resources Office
Environmental Services

Enclosures: Assessment of Effects Report

Distribution List:

Beth K. McCord, Deputy State Historic Preservation Officer

Alex Brooks, Indiana Landmarks, Central Regional Office, abrooks@indianalandmarks.org

Miami Tribe of Oklahoma

Eastern Shawnee Tribe of Oklahoma

Peoria Tribe of Indians of Oklahoma

From: [Doug Terpstra](#)
To: ["abrooks@indianalandmarks.org"](#); ["bmccord@dnr.in.gov"](#)
Cc: ["Alexander, Kelyn"](#); ["Christine Meador"](#); [Branigin, Susan](#); ["amccann@hntb.com"](#); ["cjschultz@hntb.com"](#); ["ericka.miller@indy.gov"](#); ["Coon, Matthew"](#)
Subject: FHWA Project: Des. No. 2002553, DHPA Project 27053; Assessment of Effects, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Tuesday, January 17, 2023 4:22:23 PM

Des. No.: 2002553

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties

The City of Indianapolis Department of Public Works, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067, DHPA No. 27053).

As part of Section 106 of the National Historic Preservation Act, an Assessment of Effects Report has been prepared and is ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms12c.indot.in.gov/Section106Documents/> (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. Therefore, if we do not receive a response within thirty (30) days, your agency or organization will not receive any further information on the project unless the scope of work changes.

Tribal Contacts please respond to INDOT's Acting Tribal Liaison, Matt Coon at mcoon@indot.in.gov (317-697-9752) with any responses pertaining to this project including to provide INDOT/Indiana FHWA additional information about Tribal resources/concerns and questions/comments regarding cultural resources. The FHWA point of contact is Kari Carmany-George at K.CarmanyGeorge@dot.gov (317-226-5629).

Thank you in advance for your input,

Douglas Terpstra
Project Manager/Principal Investigator-Architectural History

ASC Group, Inc.

800 Freeway Drive North, Suite 101
Columbus, Ohio 43229
614.268.2514 (office)
614.396.7367 (direct)
614.586.6367 (cell)

[Facebook](#) | [LinkedIn](#) | [Web](#)

From: [Alexander, Kelyn](#)
To: THPO@MiamiNation.com; thpo@estoo.net; [Charla EchoHawk](#)
Cc: [Doug Terpstra](#); [Coon, Matthew](#); [Carmany-George, Karstin \(FHWA\)](#)
Subject: FHWA Project: Des. No. 2002553, DHPA No. 27053; Assessment of Effects, County Line Road Added Travel Lanes, Marion and Johnson Counties, Indiana
Date: Wednesday, January 18, 2023 8:39:17 AM

Des. No.: 2002553

Project Description: County Line Road Added Travel Lanes

Location: Marion and Johnson Counties

The City of Indianapolis Department of Public Works, with funding from the Federal Highway Administration (FHWA) and administrative oversight from the Indiana Department of Transportation (INDOT), proposes to proceed with the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067, DHPA No. 27053).

As part of Section 106 of the National Historic Preservation Act, an Assessment of Effects Report has been prepared and is ready for review and comment by consulting parties.

Please review this documentation located in IN SCOPE at <http://erms12c.indot.in.gov/Section106Documents/> (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. Therefore, if we do not receive a response within thirty (30) days, your agency or organization will not receive any further information on the project unless the scope of work changes.

Tribal Contacts please respond to INDOT's Acting Tribal Liaison, Matt Coon at mcoon@indot.in.gov (317-697-9752) with any responses pertaining to this project including to provide INDOT/Indiana FHWA additional information about Tribal resources/concerns and questions/comments regarding cultural resources. The FHWA point of contact is Kari Carmany-George at K.CarmanyGeorge@dot.gov (317-226-5629).

Thank you in advance for your input,

Kelyn Alexander

Major Projects/LPA Review Liaison

Cultural Resources Office

Environmental Services

100 N. Senate Ave., Room N758-ES

Indianapolis, IN 46204

Office: (317) 519-7759

Remote: 8am-4pm

Email: kalexander3@indot.in.gov

****Link to the CRO-Public Web Map App can be found [here](#)**



**EASTERN SHAWNEE
CULTURAL PRESERVATION DEPARTMENT**

70500 East 128 Road, Wyandotte, OK 74370

February 13, 2023

INDOT - Indiana Department of Transportation
100 N. Senate Ave. IGCN642
Indianapolis, IN 46201

RE: Des No. 2002553, Marion and Johnson County, IN

Dear Mr. Coon,

The Eastern Shawnee Tribe has received your letter regarding the above referenced project(s) within Marion and Johnson County, IN. The Eastern Shawnee Tribe is committed to protecting sites important to Tribal Heritage, Culture and Religion. Furthermore, the Tribe is particularly concerned with historical sites that may contain but not limited to the burial(s) of human remains and associated funerary objects.

As described in your correspondence, and upon research of our database(s) and files, we find our people occupied these areas historically and/or prehistorically. However, the project proposes **NO Adverse Effect** or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned. However, should this project inadvertently discover an archeological site or object(s) we request that you immediately contact the Eastern Shawnee Tribe, as well as the appropriate state agencies (within 24 hours). We also ask that all ground disturbing activity stop until the Tribe and State agencies are consulted. Please note that any future changes to this project will require additional consultation.

In accordance with the NHPA of 1966 (16 U.S.C. § 470-470w-6), federally funded, licensed, or permitted undertakings that are subject to the Section 106 review process must determine effects to significant historic properties. As clarified in Section 101(d)(6)(A-B), historic properties may have religious and/or cultural significance to Indian Tribes. Section 106 of NHPA requires Federal agencies to consider the effects of their actions on all significant historic properties (36 CFR Part 800) as does the National Environmental Policy Act of 1969 (43 U.S.C. § 4321-4347 and 40 CFR § 1501.7(a)). This letter evidences NHPA and NEPA historic properties compliance pertaining to consultation with this Tribe regarding the referenced proposed projects.

Thank you, for contacting the Eastern Shawnee Tribe, we appreciate your cooperation. Should you have any further questions or comments please contact our Office.

Sincerely,

Paul Barton, Tribal Historic Preservation Officer (THPO)
Eastern Shawnee Tribe of Oklahoma
(918) 666-5151 Ext:1833
THPO@estoo.net



February 14, ~~2022~~ 2023

Douglas Terpstra
Principal Investigator
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: Assessment of effects report for the County Line Road Added Travel Lanes project, Marion and
Johnson counties (Des. No. 2002553; DHPA No. 27053)

Dear Mr. Terpstra:

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 January 17, 2023 submission, received by our office the same day for this project in Marion and Johnson counties, Indiana.

Thank you for providing a thorough summary of correspondence between the last submission that included the addendum historic property report (received by our office November 24, 2021) to now, which included the determinations from the Keeper for the four mid-century residential subdivisions within this project’s area of potential effects (“APE”). Following the Keeper’s determinations, we agree that the following historic properties are located within this project’s APE.

- Carefree Subdivision Historic District
- Ridge Hill Trails, Plat 1 Historic District
- John Sutton House, 988 N. Bluff Road (Indiana Historic Sites & Structures Inventory #081-392-10002)

Regarding the effects submission, we agree that the project as proposed will not adversely affect these historic properties.

We reiterate our comments regarding the archaeological resources. 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 archaeological sites 12Ma1077, 12Ma1078, and 12Ma1082 are eligible for inclusion in the NRHP as the site boundaries extend beyond the limits surveyed. However, it appears that the portions of these sites within the project area are not eligible for inclusion in the NRHP. The surveyed limits should be clearly marked so that unsurveyed portions of sites 12Ma1077, 12Ma1078, and 12Ma1082 are avoided by all ground-disturbing project activities. If avoidance is not feasible, further archaeological investigations and evaluation will be necessary. 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).

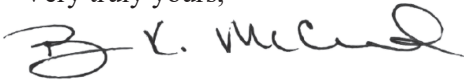
If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and -29) requires that the discovery be reported to the Indiana SHPO within two (2) business days. In that event, please 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.

Unless another consulting party expresses a different opinion about this project's effects, it might now be appropriate to ask INDOT for a finding.

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.

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

BKM:DMK:dmk:bkm

emc: Kari Carmany-George, FHWA
Erica Tait, FHWA
Matt Coon, INDOT
Susan Branigin, INDOT
Kelyn Alexander, INDOT
Douglas Terprstra, ASC Group, Inc.
Leah Konicki, ASC Group, Inc.
Indiana Landmarks Central Regional Office
Beth McCord, DNR-DHPA
Danielle Kauffmann, DNR-DHPA

**APPENDIX E: ABSTRACTS AND SUMMARIES FOR HPR, ADDENDUM HPR, PHASE IA ARCHAEOLOGICAL
REPORT, AND ADDENDUM ARCHAEOLOGICAL REPORTS**

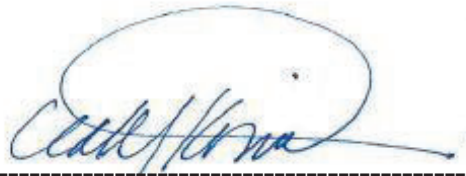
**Historic Property Report for the
County Line Road Added Travel Lanes Project,
Perry Township, Marion County and White River Township, Johnson County, Indiana
(Des. No. 2002553; DPW Project ST-45-067)**

By

Leah J. Konicki and Douglas Terpstra, MS

**Submitted By:
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300**

**Submitted To:
HNTB Corporation
111 Monument Circle, Suite 1200
Indianapolis, Indiana 46204
317.917.5325**



Leah J. Konicki, Principal Investigator

April 13, 2021



**CULTURAL • ENVIRONMENTAL • HAZARDOUS
EVALUATION & CONSULTING**

MANAGEMENT SUMMARY

This report documents the identification and evaluation efforts for properties included in the Area of Potential Effects (APE) for the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067) in Perry Township, Marion County and White River Township, Johnson County. Above-ground 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 listing in the National Register of Historic Places (NRHP). As this project is receiving funding from the Federal Highway Administration, it is subject to a Section 106 review.

The APE contains no properties listed in the NRHP. The APE contains no properties that are recommended eligible for listing in the NRHP.

CONCLUSIONS

The APE contains no properties listed in the NRHP. As a result of identification and evaluation efforts for this project, no properties are recommended eligible for listing in the NRHP.

**Addendum to
Historic Property Report for the
County Line Road Added Travel Lanes Project,
Perry Township, Marion County and White River Township, Johnson County, Indiana
(Des. No. 2002553; DPW Project ST-45-067; DHPA No. 27053)**

By

**Leah J. Konicki, MEd, Sarah Terheide, MA,
Nora Hillard, and Douglas Terpstra, MS**

**Submitted By:
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300**

**Submitted To:
HNTB Corporation
111 Monument Circle, Suite 1200
Indianapolis, Indiana 46204
317.917.5325**



Leah J. Konicki, Principal Investigator

November 23, 2021



**CULTURAL • ENVIRONMENTAL • HAZARDOUS
EVALUATION & CONSULTING**

MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Corporation (HNTB), completed an addendum to the Historic Property Report (HPR) for the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067; DHPA No. 27053) in Perry Township, Marion County and White River Township, Johnson County. The HPR was released and consulting parties notified of its availability on June 3, 2021; the Indiana State Historic Preservation Officer (SHPO) responded to the findings in the report by letter dated July 6, 2021, as revised July 15, 2021.

In its response, SHPO stated its disagreement with the recommendations in the HPR, and advised that the five subdivisions listed below are eligible for inclusion in the National Register of Historic Places (NRHP), based on information from the *Residential Planning and Development in Indiana, 1940–1973* Multiple Property Documentation Form (MPDF) [Higgins 2018].

Johnson County

Richards and Landers Mt. Pleasant Subdivision
Wood Creek Estates
Carefree Subdivision

Marion County

Ridge Hill Trails
Hill Valley Estates

This HPR Addendum also addresses above-ground cultural resources within areas added to the project footprint as a result of changes to the project footprint: the construction of a connector road between Mount Pleasant South Street and N. Bluff Road, and additional drainage areas along County Line Road north and south of the original APE .

Within the additional APE for the Bluff Road Connector, one property – the John Sutton House at 988 N. Bluff Road – was recommended eligible.

As a result of the National Historic Preservation Act, 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. As this project is receiving funding from the Federal Highway Administration, it is subject to a Section 106 review.

This addendum report documents additional research, historic context development, and evaluation of these five subdivisions. As a result of this investigation, the Area of Potential Effects (APE) contains no properties listed in the NRHP. The APE contains no properties that are recommended eligible for listing in the NRHP.

CONCLUSIONS

ASC, under contract with HNTB, has completed an Addendum to the HPR for the County Line Road Added Travel Lanes Project (Des. No. 2002553; DPW Project ST-45-067; DHPA No. 27053). For this addendum, five subdivisions were evaluated for NRHP Eligibility.

- Richards and Landers Mt. Pleasant Subdivision
- Wood Creek Estates
- Carefree Subdivision
- Ridge Hill Trails
- Hill Valley Estates

Within the additional APE for the Bluff Road Connector, one property – the John Sutton House at 988 N. Bluff Road – was recommended eligible.

Based on the analysis and evaluation efforts in this document, none of the subdivisions are recommended eligible for listing in the NRHP.

In conclusion, there is one historic property identified in the APE.

**Phase Ia Archaeological Records Check and Reconnaissance Survey for the
Proposed County Line Road Added Travel Lanes Project from 0.30 Mile West of
Morgantown Road to SR 135/South Meridian School Road in the
City of Indianapolis, Perry Township, Marion County and the
City of Greenwood, White River Township, Johnson County, Indiana
(Des. No. 2002553; DPW Project ST-45-067)**

By

Andrea D. Crider, MA, RPA and Sarah Terheide, MA

**Submitted By:
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300**

**Submitted To:
HNTB Corporation
111 Monument Circle, Suite 1200
Indianapolis, Indiana 46204
317.829.9600**

Lead Agency: LPA

May 27, 2021



Andrea D. Crider, MA, RPA, Principal Investigator



**CULTURAL • ENVIRONMENTAL • HAZARDOUS
EVALUATION & CONSULTING**

MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Corporation, has completed a Phase Ia Archaeological Records Check and Reconnaissance Survey report for the proposed County Line Road Added Travel Lanes Project from 0.48 kilometer (km) [0.30 mile (mi)] west of Morgantown Road to State Route (SR) 135/South Meridian Street (Des. No. 2002553; DPW Project ST-45-067) in the City of Indianapolis, Perry Township, Marion County, and the City of Greenwood, White River Township, Johnson County, Indiana. The project is located along the common line of the SE ¼ of Section 21 and the NE ¼ of Section 28, continuing along the common line of Sections 22 and 27; and Sections 23 and 26 within Township 14N, Range 3E of the Maywood, Indiana topographic quadrangle. The project is being coordinated with the Federal Highway Administration (FHWA) and the Indiana Department of Transportation.

The proposed project includes the expansion of County Line Road to a five-lane road, with two 3.4 meter (m) [11-foot (ft)] lanes in each direction and a 3.96 m (13-ft) two-way left turn lane. The project also includes a 3.08 m (10-ft) multi-purpose trail on the north side, 1.82 m (6-ft) concrete buffers on either side, and a 1.82 m (6-ft) sidewalk on the south side of the roadway. Two existing bridges will also be replaced to accommodate the additional travel lanes. The proposed bridge structures will accommodate the proposed roadway with the only modification to the typical section being that the concrete buffers will be 0.61 m (2 ft) per side within the bridge structure limits. The project will also construct stormwater detention and an enclosed stormwater system, and will address the sharp vertical curve at Morgantown Road. Approximately 6.07 hectares (ha) [15 acres (ac)] of new permanent or temporary right-of-way (ROW) will be needed for this project. The survey area is approximately 3,998.5 m (13,118.4 ft) long and ranges from 27.5 m (90.2 ft) to 64 m (209 ft) wide, with the width increasing to 283.6 m (930.4 ft) at major road intersections. The survey area totaled 26.5 ha (65.5 ac).

The archaeological fieldwork was conducted in accordance with the *INDOT Cultural Resources Manual* (Indiana Department of Transportation [INDOT] 2019) and the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (2019) archaeology guidelines. 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.

The survey resulted in the documentation of six new archaeology sites. These included three prehistoric lithic scatters (12-Ma-1075, 12-Ma-1077, and 12-Jo-0736), one prehistoric lithic scatter with a historic component (12-Ma-1078), one historic artifact scatter (12-Jo-0737), and one prehistoric isolated find (12-Ma-1076). Sites 12-Ma-1075, 12-Ma-1076, 12-Jo-0736, and 12-Jo-0737 were recommended as not eligible for the NRHP or IRHSS. No additional archaeological assessment is recommended at these sites. Sites 12-Ma-1077 and 12-Ma-1078 may extend north beyond current survey area boundaries. The portions of both of these sites located within the current survey corridor area would not contribute to the eligibility of the site for inclusion on the NRHP or the IRHSS. No further assessment is recommended for the portion of the sites 12-Ma-1077 and 12-Ma-1078 within the current survey boundary. If the survey area should change, then further archaeological survey may be warranted at these sites. It is recommended that the proposed project can proceed within the current survey area.

CONCLUSIONS AND RECOMMENDATIONS

ASC Group, Inc., under contract with HNTB Corporation, has completed a Phase Ia Archaeological Records Check and Reconnaissance Survey report for the proposed County Line Road Added Travel Lanes Project from 0.48 km (0.30 mi) west of Morgantown Road to SR 135/South Meridian Street (Des. No. 2002553; DPW Project ST-45-067) in the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Indiana. The survey area is approximately 3,998.5 m (13,118.4 ft) long and ranging from 27.5 m (90.2 ft) to 64 m (209 ft) wide, with the width bumping out at up to 283.6 m (930.4 ft) at major road intersections. The survey area totaled 26.5 ha (65.5 ac).

The survey resulted in the documentation of six new archaeology sites. These included three prehistoric lithic scatters (12-Ma-1075, 12-Ma-1077, and 12-Jo-0736), one prehistoric lithic scatter with historic artifact scatter component (12-Ma-1078), one historic artifact scatter (12-Jo-0737), and one prehistoric isolated find (12-Ma-1076). Sites 12-Ma-1075, 12-Ma-1076, 12-Jo-0736, and 12-Jo-0737 were recommended as not eligible for the NRHP or IRHSS. No additional archaeological assessment is recommended at these sites. Sites 12-Ma-1077 and 12-Ma-1078 may extend north beyond current survey area boundaries. The portions of both these sites located within the current survey corridor area would not contribute to the eligibility of the site for inclusion on the NRHP or the IRHSS. No further assessment is recommended for the portion of sites 12-Ma-1077 and 12-Ma-1078 within the current survey boundary. If the survey area should change, then further archaeological survey may be warranted at these sites. It is recommended that the proposed project can proceed within the current survey area.

In the unlikely event that archaeological deposits or human remains are encountered during the construction of the proposed project, all work must cease within 30 m (100 ft) of the discovery and archaeologists from the IDNR, DHPA and the INDOT Cultural Resources Office must be notified.

**Addendum to a Phase Ia Archaeological Records Check and Reconnaissance Survey for
the Proposed County Line Road Added Travel Lanes Project from 0.30 Mile West of
Morgantown Road to SR 135/South Meridian Street in the
City of Indianapolis, Perry Township, Marion County and the
City of Greenwood, White River Township, Johnson County, Indiana
(Des. No. 2002553; DPW Project ST-45-067)**

By

Sarah Terheide, MA

**Submitted By:
ASC Group, Inc.
9376 Castlegate Drive
Indianapolis, Indiana 46256
317.915.9300**

**Submitted To:
HNTB Corporation
111 Monument Circle, Suite 1200
Indianapolis, Indiana 46204
317.829.9600**

Lead Agency: LPA

November 12, 2021



Andrea D. Crider, MA, RPA, Principal Investigator



**CULTURAL • ENVIRONMENTAL • HAZARDOUS
EVALUATION & CONSULTING**

MANAGEMENT SUMMARY

ASC Group, Inc., under contract with HNTB Corporation, has completed an Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey report for the proposed County Line Road Added Travel Lanes Project from 0.48 kilometer (km) [0.30 mile (mi)] west of Morgantown Road to State Route (SR) 135/South Meridian Street (Des. No. 2002553; DPW Project ST-45-067) in the City of Indianapolis, Perry Township, Marion County, and the City of Greenwood, White River Township, Johnson County, Indiana. The project is located along the common line of the SE $\frac{1}{4}$ of Section 21 and the NE $\frac{1}{4}$ of Section 28, continuing along the common line of Sections 22 and 27; and Sections 23 and 26 within Township 14N, Range 3E of the Maywood, Indiana topographic quadrangle. The project is being coordinated with the Federal Highway Administration (FHWA) and the Indiana Department of Transportation (INDOT).

The original project plans included the expansion of County Line Road to a five-lane road, with two 3.4-meter (m) [11-foot (ft)] lanes in each direction and a 3.96-m (13-ft) two-way left turn lane. The project also included a 3.08-m (10-ft) multi-purpose trail on the north side, 1.82-m (6-ft) concrete buffers on either side, and a 1.82-m (6-ft) sidewalk on the south side of the roadway. The plans for the initial work also involved the replacement of two existing bridges and the construction of stormwater detention and an enclosed stormwater system. The original survey area totaled 26.5 hectares (ha) [65.5 acres (ac)] (Crider and Terheide 2021). Recently, additional areas have been included in the project area to address drainage concerns along the project corridor and access concerns for the Richard-Landers Mt. Pleasant Subdivision. The additional drainage areas are located adjacent to the original project area from Bluff Road to SR 135/South Meridian Street. The additional area for the connector road is adjacent to Bluff Road and Mt. Pleasant West Street, approximately 0.42 km (0.26 mi) south of South County Line Road. The additional survey areas totaled 1.772 ha (4.378 ac).

The archaeological fieldwork was conducted in accordance with the *INDOT Cultural Resources Manual* (INDOT 2014) and the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (2019) archaeology guidelines. 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.

The Addendum Phase Ia survey resulted in the documentation of one new archaeology site. This site was an unidentified prehistoric isolated find (12-Ma-1082). Site 12-Ma-1082 is recommended as not eligible for the National Register of Historic Places (NRHP) or the Indiana Register of Historic Sites and Structures (IRHSS). No additional archaeological assessment is recommended at this site. It is recommended that the proposed project can proceed within the current survey area.

CONCLUSIONS AND RECOMMENDATIONS

ASC Group, Inc., under contract with HNTB Corporation, has completed an Addendum Phase Ia Archaeological Records Check and Reconnaissance Survey report for the proposed County Line Road Added Travel Lanes Project from 0.48 km (0.30 mi) west of Morgantown Road to SR 135/South Meridian Street (Des. No. 2002553; DPW Project ST-45-067) in the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Indiana. The addendum survey area consisted of multiple additional drainage areas which were extensions of the original corridor, as well as a separate area for a proposed connector road between Bluff Road and Mt. Pleasant West Street. The addendum survey area totaled 1.772 ha (4.378 ac).

The addendum survey resulted in the documentation of one new archaeological site. This site (12-Ma-1082) is an unidentified prehistoric isolated find. Site 12-Ma-1082 was recommended as not eligible for the NRHP or IRHSS. No additional archaeological assessment is recommended at this site. It is recommended that the proposed project can proceed within the current survey area.

In the unlikely event that archaeological deposits or human remains are encountered during the construction of the proposed project, all work must cease within 30 m (100 ft) of the discovery and archaeologists from the IDNR, DHPA and the INDOT Cultural Resources Office must be notified.



INDIANA ARCHAEOLOGICAL SHORT REPORT

State Form 54566 (R3 / 3-22)

INDIANA DEPARTMENT OF NATURAL RESOURCES DIVISION OF HISTORIC PRESERVATION AND ARCHAEOLOGY

402 West Washington Street, Room W274

Indianapolis, Indiana 46204-2739

Telephone Number: (317) 232-1646

Fax Number: (317) 232-0693

E-mail: dhpa@dnr.IN.gov

Where applicable, the use of this form is recommended but not required by the Division of Historic Preservation and Archaeology (DHPA).

Name(s) of author(s) Andrea Crider, MA, RPA	Date (month, day, year) August 3, 2023
Title of project Second Addendum to a Phase Ia Archaeological Records Check and Reconnaissance Survey for the Proposed County Line Road Added Travel Lanes Project from 0.30 Mile West of Morgantown Road to SR 135/South Meridian Street in the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Indiana (INDOT Des. No. 2002553; DPW Project ST-45-067)	
This document is being used to report on the results of: <input type="checkbox"/> Records check only <input checked="" type="checkbox"/> Records check and Phase 1a archaeological reconnaissance <input checked="" type="checkbox"/> An addendum to a previous archaeological report. For an addendum, provide the following information.	
Name(s) of author(s) of previous report Andrea Crider and Sarah Terheide (Original Report); Sarah Terheide (First Addendum Report)	
Title of previous report Phase Ia Archaeological Records Check and Reconnaissance Survey for the Proposed County Line Road Added Travel Lanes Project from 0.30 Mile West of Morgantown Road to SR 135/South Meridian Street in the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Indiana (Des. No. 2002553; DPW Project ST-45-067) [Original Report] Addendum to a Phase Ia Archaeological Records Check and Reconnaissance Survey for the Proposed County Line Road Added Travel Lanes Project from 0.30 Mile West of Morgantown Road to SR 135/South Meridian Street in the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Indiana (Des. No. 2002553; DPW Project ST-45-067) [First Addendum Report]	
Date of previous report (month, day, year) May 27, 2021 (Original Report); November 12, 2021 (First Addendum Report)	DHPA number 27053

PROJECT OVERVIEW

Description of project This report is a second addendum report for the proposed County Line Road Added Travel Lanes Project from 0.48 kilometer (km) [0.30 mile (mi)] west of Morgantown Road to State Route (SR) 135/South Meridian Street (Indiana Department of Transportation [INDOT] Des. No. 2002553; DPW Project ST-45-067) in the City of Indianapolis, Perry Township, Marion County and the City of Greenwood, White River Township, Johnson County, Indiana (Figures 1–3). The original project plans included the expansion of County Line Road to a five-lane road, with two 3.4-meter (m) [11-foot (ft)] lanes in each direction and a 3.96-m (13-ft) two-way left turn lane. The project also included a 3.08-m (10-ft) multi-purpose trail on the north side, 1.82-m (6-ft) concrete buffers on either side, and a 1.82-m (6-ft) sidewalk on the south side of the roadway. The plans for the initial work also involved the replacement of two existing bridges and the construction of stormwater detention and an enclosed stormwater system. The original survey area totaled 26.5 hectares (ha) [65.5 acres (ac)] (Crider and Terheide 2021). The first addendum report addressed additional areas included in the project area to address drainage concerns throughout the project corridor and access concerns for the Richard-Landers Mt. Pleasant Subdivision. The additional survey included 1.772 ha (4.378 ac) [Terheide 2021]. The survey area for this second addendum included a widened footprint for this project, predominately for two additional drainage areas. The wider footprint for the connector road to Bluff Road will accommodate a new drainage area. The wider footprint in the agricultural field will accommodate new drainage, a retention pond, and soil disposal. The purpose of the County Line Road Project is to address capacity deficiencies, improve east-west mobility, and improve safety within the corridor. The additional areas will address further drainage concerns. The need for this project is the existing and future capacity restrictions as the projected traffic demands will exceed the capacity of the existing two-lane configuration. Additionally, there are no pedestrian or bicycle facilities associated with the existing roadway, which is in a high density residential area.			
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Prepared for: (Company / Institution / Agency) HNTB Corporation			

at a slow pace until 1847, when the first locomotives on the Madison and Indianapolis Railroad reached the city (HLFI 1991). From the center of Indianapolis, the city first grew eastward along the National Road to capitalize on the migration of settlers heading westward. With the advent of the railroad, Indianapolis became a major railroad hub connecting the nation, ultimately becoming the first city in which all trains arrived and left from a single central station, the original Union Terminal was built in 1857. The influx of railroad transportation spurred growth that created new industries, commercial enterprises, and residences along these rail corridors from the center of the city outwards. After World War II, the boundaries of Indianapolis continued to expand into areas along the boundaries of Marion County. The passage of the Federal Aid Highway Act of 1956 harkened the construction of the Interstate Highway System, including I-65 and I-70. The construction of I-65 and I-70 from 1960 to 1974 reshaped Indianapolis, demolishing entire neighborhoods within older districts such as the Old Northside (HLFI 1991).

The historic map review included an examination of the Baskin, Forster & Company's Map of Johnson County (1876); Duckworth's Johnson County map (1912); Indiana Highway Survey Commission's (IHSC's) Map of Johnson County, Cultural (1936a); Wilson, Fuller's Illustrated Plat Book of Shelby and Johnson Counties, Indiana (1900); W.W. Hixson's Plat Book of Johnson County, Indiana (1926); and the 1948 and 1967 Maywood, Indiana USGS 7.5' topographic maps (USGS 1948, 1967). The 1876 and 1900 maps show sparse development along County Line Road, with large parcels and no buildings depicted adjacent to the survey area (Baskin, Forster 1876; Wilson, Fuller 1900). The 1912 and 1926 maps show a smaller division of parcels and the construction of a railroad intersection with Railroad Road (Duckworth 1912; W.W. Hixson 1926). The maps spanning from 1936 to 1967 indicate an increase in residential development along County Line Road adjacent to the survey area (IHSC 1936a; USGS 1948, 1967).

Several historic maps from Marion County were examined (A.C. Wagner 1931; Fatout and Bohn 1889; IHSC 1936b; National Map 1917; Palmer and Bauer Engineering 1895; W.W. Hixson 1938). These maps largely reflected the trends discussed in the map review above.

According to SHAARD, there are no county survey sites, historic bridges, national register sites, or any other historic resources within or adjacent to the survey area.

Records check (Check all that apply)

- ☐ The project area does not have the potential to contain archaeological resources. *Provide explanation / justification.*
- ☐ There are previously recorded archaeological resources within the project area, but those resources do not warrant additional archaeological investigation. *Provide explanation / justification.*
- ☒ The project area contains previously recorded archaeological resources that warrant additional investigation and/or the project area has the potential to contain archaeological resources. *Provide explanation / justification.*
- ☒ Based upon the records check results, a reconnaissance has been conducted.
- ☐ A cemetery is located within or adjacent to the project area.

Explanation / justification

The records check indicates that the survey area has been in use historically both residentially and commercially extending westward from the Greenwood town center. There are also recorded prehistoric sites located within 0.8 km (0.5 mi) of the survey area. This suggests that there is a potential for historic or prehistoric archaeological sites in the survey area.

Phase 1a archaeological reconnaissance (Check all that apply)

- ☐ No Phase 1a reconnaissance was conducted.
- ☒ Phase 1a reconnaissance located no archaeological resources.
- ☐ Previously recorded sites were in the project area.
- ☐ Artifacts and/or features at a previously recorded site(s) within the project area were not discovered. *List the site(s) below.*
- ☐ Phase 1a reconnaissance has identified landforms conducive to buried archaeological deposits. *Describe below.*

List sites.

Describe landforms.

Number of shovel probes excavated
9

Number of cores / auger probes
2

Describe disturbances. Attach photographs documenting disturbances.
Roadside drainage, pavement, agricultural activity

Actual area surveyed (hectares)
9.17

Actual area surveyed (acres)
22.67

Explain results of fieldwork.

The survey area runs predominately along the north and south sides of South County Line Road and consists of residential neighborhoods and agricultural fields. These new added areas are labeled Areas 1 through 7. Area 3 was covered by previous surveys (Crider and Terheide 2021; Terheide 2021).

Area 1 is located between North Bluff Road and Mount Pleasant South Street and is intended as drainage improvement for the proposed new access road immediately to the north. Shovel probes in this area revealed a dark yellowish brown (10YR 4/4) sandy silt loam extending to 50 centimeters below the surface (cmbs) [19.7 inches below the surface (inbs)]. This stratum was underlain by a dark yellowish brown (10YR 3/4) sandy silt loam subsoil with iron staining.

Area 2 is located on both sides of North Morgantown Road west of Pleasant Run Creek. Shovel probes in this area displayed a brown (10YR 4/3) sandy clay loam ranging from 24 to 50 cmbs (9.4 to 19.7 inbs) underlain by a strong brown (7.5YR 4/6) sandy loam. As this area was mapped within a soil complex with alluvial soils, Shovel Probe 2 was continued with a bucket auger. The auger revealed a very dark brown (7.5YR 2.5/2) sand from 61 to 100 cmbs (23.6 to 39.4 inbs) above a dark brown (7.5YR 3/4) sand mottled with strong brown (7.5YR 5/8) sand. These soils were present to the extent of the auger at 150 cmbs (59.1 inbs). There was no evidence for buried cultural deposits or a buried A horizon.

Area 4 is a large, cultivated field on the south side of County Line Road. Visibility was greater than 30 percent thus the field was subject to pedestrian survey. Two small wooded areas were subject to shovel probing. Shovel Probes 1 and 2 were excavated near Pleasant Run Creek revealing a brown (10YR 4/3) sandy clay loam to 27 cmbs (10.6 inbs) over a yellowish brown (10YR 5/8) clay loam. Shovel Probe 1 was continued with a bucket auger which was met with a rock impasse at 74 cmbs (29.1 inbs). Shovel Probes 3 and 4 were excavated within a copse in the agricultural field. These shovel probes presented a mixed soil of brown (10YR 4/3) sandy clay mixed with yellowish brown (10YR 5/8) sandy clay for approximately 20 cmbs (7.9 inbs) over a rock impasse. This disturbance would be consistent with a rock/debris pile from field clearing.

Areas 5, 6, and 7 have all been previously disturbed by ditches, utilities, and other associated urban infrastructure.

No archaeological sites were identified during the survey.

RECOMMENDATIONS

Records check *(Check all that apply)*

- ☐ No archaeological investigation is recommended before the project is allowed to proceed because the records check has determined that the project area does not have the potential to contain archaeological resources.
- ☐ A Phase 1a archaeological reconnaissance is recommended.
- ☒ Based upon the records check results, a Phase 1a archaeological reconnaissance was recommended and has been conducted.
- ☐ A cemetery development plan may be required under Indiana Code 14-21-1-26.5 because project ground disturbance will be within 100 feet of a cemetery.

Phase 1a archaeological reconnaissance *(Check all that apply)*

- ☒ It is recommended that the project be allowed to proceed as planned because the Phase 1a archaeological reconnaissance has located no archaeological sites within the project area and/or previously recorded sites that were investigated warrant no additional investigation.
- ☐ It is recommended that Phase 1c archaeological subsurface reconnaissance be conducted before the project is allowed to proceed. The Phase 1a archaeological reconnaissance has determined that the project area includes landforms which have the potential to contain buried archaeological deposits.

Other recommendations / commitments

Pursuant to IC-14-21-1, if any 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 must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646.

REQUIRED ATTACHMENTS

- ☒ Figure showing project location within Indiana
- ☒ USGS topographic map showing the project area *(1:24,000 scale)*
- ☒ Aerial photograph showing the project area, land use and survey methods
- ☒ Photographs of the project area, including, if applicable, photographs documenting disturbances
- ☐ Project plans *(if available)*

Other attachments

Appendix A: Legal Locations

Appendix B: Sites and Previous Archaeological Studies within 0.8 km (0.5 mi)

References cited *(See short report instructions for required references to be consulted)*

A.C. Wagner Co.

1931 Wagner's Map of Marion County, Indiana. A.C. Wagner Co. Map Collection, Indiana Division, Indiana State Library.

Electronic document, <https://indianamemory.contentdm.oclc.org/digital/collection/p15078coll8/id/1079/rec/7>, accessed June 1, 2023.