

**FEDERAL HIGHWAY ADMINISTRATION'S  
SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties) AND  
SECTION 106 FINDINGS AND DETERMINATIONS  
AREA OF POTENTIAL EFFECT  
ELIGIBILITY DETERMINATIONS  
EFFECT FINDING  
COUNTY LINE ROAD ADDED TRAVEL LANES PROJECT (DPW PROJECT ST-45-067),  
PERRY TOWNSHIP, MARION COUNTY AND WHITE RIVER TOWNSHIP, JOHNSON COUNTY  
DES. NO.: 2002553**

**AREA OF POTENTIAL EFFECTS**

**(Pursuant to 36 CFR Section 800.4(a)(1))**

The above-ground resources Area of Potential Effects (APE) extends from the west side of State Road (SR) 37 in the west to the east side of SR 135/Meridian Street in the east. The width of the APE is generally one or two parcels deep, but extends farther at intersections where sight lines along the intersecting roads are deeper (Appendix A: Maps 2–3). The archaeological APE is defined by a survey area encompassing approximately 70 acres that includes all of the existing and proposed right-of-way required for the undertaking.

**ELIGIBILITY DETERMINATIONS**

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

*Carefree Subdivision Historic District*

The Carefree Subdivision Historic District was determined eligible under Criteria A and C under Community Planning and Development and Architecture. It is a Custom Development, as defined in the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form. The Carefree Subdivision is composed of approximately 700 houses, including a variety of period architecture types and styles, curving streets and culs-de-sac, a clubhouse and pool, with a public school abutting the plat. It is located along a major roadway with easy access to churches and commercial buildings. The northernmost edge of the Carefree Subdivision along County Line Road is included within the APE for this project.

*Ridge Hill Trails, Plat 1 Historic District*

The Ridge Hill Trails, Plat 1 Historic District was determined eligible under Criterion C under Architecture. It is a Custom Development subdivision, as defined in the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form, with a curvilinear plan with a variety of styles and types of houses. The Ridge Hill Trails, Plat 1 is located along a major roadway with easy access to churches and commercial buildings. The southernmost edge of the Ridge Hill Trails, Plat 1 along County Line Road is included within the APE for this project.

*John Sutton House, 988 North (N.) Bluff Road (IHSSI #081-392-10002)*

The John Sutton House at 988 N. Bluff Road (IHSSI #081-392-10002) is an Italianate style house that was constructed ca. 1875. It was determined eligible for the NRHP under Criterion C as an excellent example of the Italianate style in White River Township, Johnson County, Indiana.

## **EFFECT FINDING**

Carefree Subdivision Historic District: No Adverse Effect

Ridge Hill Trails, Plat 1 Historic District: No Adverse Effect

John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002): No Adverse Effect

The Indiana Department of Transportation (INDOT), acting on the Federal Highway Administration's (FHWA's) behalf, has determined a "No Adverse Effect" finding is appropriate for this undertaking.

INDOT respectfully requests the Indiana State Historic Preservation Officer provide written concurrence with the Section 106 determination of effect.

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

CAREFREE SUBDIVISION HISTORIC DISTRICT - This undertaking will convert property from CAREFREE SUBDIVISION HISTORIC DISTRICT, a Section 4(f) historic property, to a transportation use; the INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect"; therefore FHWA hereby intends to issue a "de minimis" finding for the CAREFREE SUBDIVISION HISTORIC DISTRICT, pursuant to SAFETEA-LU, thereby satisfying FHWA's responsibilities under Section 4(f) for this historic property.

RIDGE HILL TRAILS, PLAT 1 HISTORIC DISTRICT - This undertaking will convert property from RIDGE HILL TRAILS, PLAT 1 HISTORIC DISTRICT, a Section 4(f) historic property, to a transportation use; the INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect"; therefore FHWA hereby intends to issue a "de minimis" finding for the RIDGE HILL TRAILS, PLAT 1 HISTORIC DISTRICT, pursuant to SAFETEA-LU, thereby satisfying FHWA's responsibilities under Section 4(f) for this historic property.

JOHN SUTTON HOUSE, 988 N. Bluff Road (IHSSI #081-392-10002) - This undertaking will not convert property from the JOHN SUTTON HOUSE, 988 N. Bluff Road (IHSSI #081-392-10002), a Section 4(f) historic property, to a transportation use; the INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is No Adverse Effect; therefore, no Section 4(f) evaluation is required for the JOHN SUTTON HOUSE, 988 N. Bluff Road (IHSSI #081-392-10002).



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Matthew S. Coon, for FHWA  
Manager  
INDOT Cultural Resources

October 13, 2023

Approved Date

**FEDERAL HIGHWAY ADMINISTRATION  
DOCUMENTATION OF SECTION 106 FINDING OF  
NO ADVERSE EFFECT  
SUBMITTED TO THE STATE HISTORIC PRESERVATION OFFICER  
PURSUANT TO 36 CFR Section 800.5(c)**

**COUNTY LINE ROAD ADDED TRAVEL LANES PROJECT, PERRY TOWNSHIP, MARION COUNTY AND  
WHITE RIVER TOWNSHIP, JOHNSON COUNTY, INDIANA  
DES. NO.: 2002553**

## **1. DESCRIPTION OF THE UNDERTAKING**

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 (INDOT Des. No. 2002553; DPW Project ST-45-067; DHPA No. 27053) in Perry Township, Marion County and White River Township, Johnson County, Indiana. The proposed undertaking is located on County Line Road and begins 0.30 mile west of Morgantown Road and extends east to State Road (SR) 135/Meridian Street (Appendix A: Maps 1–3).

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 onto Meridian Street) between Illinois Street and SR 135/Meridian Street. 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 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 Run Creek (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 (Appendix B). 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 and an 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 North (N.) Bluff Road, and additional drainage areas along Railroad Road. The project requires the acquisition of 22.635 acres of permanent right-of-way and 31.440 acres of temporary right-of-way.

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.

Because this project is receiving funds from FHWA, it is a federal undertaking subject to Section 106 of the National Historic Preservation Act as defined in 36 CFR 800.16(y).

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. Based on the scope and nature of the project, the APE boundary for above-ground properties for this project was determined by sight lines to and from the project. The APE extends from the west side of SR 37 in the west to the east side of SR 135/Meridian Street in the east. The width of the APE is generally one or two parcels deep, but extends farther at intersections where sight lines along the intersecting roads are deeper (Appendix A: Map 3). The archaeological APE is defined by a survey area encompassing approximately 70 acres that includes all of the existing and proposed right-of-way required for the undertaking.

The project area is located in an area of extensive late-twentieth century suburban development. Subdivisions platted from the 1960s to the present day are located along much of County Line Road, although individual houses of similar age are also found along portions of County Line Road. Commercial development is located around the intersection of County Line Road and SR 135/Meridian Street (Appendix C: Photographs 1–28).

## **2. EFFORTS TO IDENTIFY HISTORIC PROPERTIES**

The State Historic Preservation Officer (SHPO) is entitled to participate in the Section 106 process as a consulting party. The following other individuals and organizations were invited by letter or email dated February 16, 2021, to be consulting parties (Appendix D: D-4 to D-15).

Beth K. McCord, Deputy State Historic Preservation Officer  
Joseph O'Connor, Marion County Board of Commissioners  
Barbara Lawrence, Marion County Board of Commissioners  
Julie Voorhies, Marion County Board of Commissioners  
Anna Gremling, Indianapolis Metropolitan Planning Organization  
Sean Northup, Indianapolis Metropolitan Planning Organization  
Indianapolis Department of Metropolitan Development  
Dan Parker, Indianapolis Department of Public Works  
Elizabeth Nowak, Indianapolis Historic Preservation Commission  
Joe Hogsett, Mayor, City of Indianapolis  
Brian Baird, Johnson County Commissioner, District 1  
Kevin Walls, Johnson County Commissioner, District 2  
Ron West, Johnson County Commissioner, District 3

James Ison, Johnson County Commissioner, District 4  
Mark Myers, Mayor, City of Greenwood  
Daniel Johnston, Greenwood Community Development Services  
Dale C. Davis, AICP, Greenwood Planning Director  
Dave Hittle, Johnson County Planning and Zoning  
Luke Mastin, Johnson County Highway Department  
Neil VanTrees, Johnson County Highway Department  
Joshua Biggs, Indiana Landmarks, Central Regional Office  
Chad Lethig, Indiana Landmarks, Central Regional Office  
Steven Barnett, Marion County Historian  
Carol A. Hall, President, Marion County Historical Society  
Keith Brown, President, Perry Township-Southport Historical Society  
Max Fitzpatrick, Johnson County Historian  
David Pfeiffer, Director, Johnson County Historical Society and Museum  
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

By letter and email dated February 16, 2021, Indiana Landmarks accepted consulting party status (Appendix D: D-16 to D-17).

SHPO responded by letter dated February 25, 2021, and requested to be notified of those who accepted consulting party status with the next correspondence (Appendix D: D-18 to D-19).

The Miami Tribe of Oklahoma responded by letter dated March 18, 2021, and accepted consulting party status (Appendix D: D-20).

No other consulting party responses were received.

Efforts to identify historic properties in the APE included a check of data available online at the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) and the Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBC Map), a review of the *Johnson County Interim Report* (1985) and the *Marion County: Decatur, Perry, and Franklin Townships Interim Report* (1992), historical/architectural and archaeological fieldwork, and communication with consulting parties. Sources of information examined included NRHP listings, Indiana Register of Historic Sites and Structures (IRHSS) listings, the Indiana Historic Bridge Inventory, archaeological site maps, cultural resources management reports, and cemetery records.

There are no NRHP- or IRHSS-listed properties within the APE. No historic bridges, cemeteries, or previously recorded archaeological sites are located within the APE. No properties in the APE have been recorded in the Indiana Historic Sites and Structures Inventory.

The results of the field surveys were reported in a Historic Property Report (HPR) [Konicki and Terpstra 2021] and a Phase Ia Archaeological Records Check and Reconnaissance Survey Report (Crider and Terheide 2021). The principal investigators for these reports meet the Secretary of the Interior's

Professional Qualification Standards as per 36 CFR Part 61. The HPR recommended no properties as eligible for listing in the NRHP.

The archaeology survey identified six new sites: 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. 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 was recommended for the portion of the sites 12-Ma-1077 and 12-Ma-1078 within the current survey boundary.

A copy of the abstracts and summaries for the HPR and Phase Ia archaeology report are included in Appendix E.

A letter distributed on June 3, 2021, notified consulting parties that a historic property report (HPR) and an archaeology report (Tribes only) were available for review and comment (Appendix D: D-21 to D-26).

In its response to the HPR dated July 6, 2021 (revised July 15, 2021) [Appendix D: D-27 to D-32], the Indiana State Historic Preservation Office (SHPO) stated that five subdivisions located within the APE for this project were eligible for the NRHP, as listed below:

- Richards and Landers Mount Pleasant Subdivision
- Wood Creek Estates
- Carefree Subdivision
- Ridge Hill Trails
- Royal Meadows/Hill Valley Estates<sup>1</sup>

With regard to archaeological resources, in its July 6, 2021 (revised July 15, 2021), response (Appendix D: D-27 to D-32), SHPO stated its concurrence “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.” The letter went on to state that, “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.” SHPO requested that 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.”

By letter dated August 3, 2021, the Eastern Shawnee Tribe of Oklahoma stated, in part, that “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned” (Appendix D: D-33).

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<sup>1</sup> 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. This subdivision will be referred to as Hill Valley Estates for the remainder of this document.

No other consulting party comments were received in response to the HPR or archaeology report.

Subsequently, an Addendum to the HPR (Konicki, Terheide, Hillard, and Terpstra 2021) was prepared, both to assess the NRHP-eligibility of the five subdivisions identified by SHPO (Richards and Landers Mount Pleasant Subdivision; Wood Creek Estates; Carefree Subdivision; Ridge Hill Trails; and Hill Valley Estates), as well as to address above-ground cultural resources within areas added 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 County Line Road north and south of the original APE.

By letter dated November 23, 2021, this Addendum to the HPR was distributed to consulting parties (Appendix D: D-34 to D-38). Within the additional APE for the Bluff Road Connector, one property—the John Sutton House at 988 N. Bluff Road—was recommended eligible for the NRHP. Within the original APE for the project, it was found that no properties were listed in the NRHP, and no properties, i.e., the five subdivisions identified by SHPO, were recommended eligible for listing in the NRHP as a result of the Addendum to the HPR.

An Addendum to the Phase Ia Archaeological Records Check and Reconnaissance Survey Report (Terheide 2021) also was prepared to address archaeology resources within the area added to the project footprint. This addendum report identified one additional archaeological site, but recommended new site 12Ma1082 as not eligible for the NRHP.

A letter dated December 20, 2021, was distributed by email dated December 21, 2021, advising consulting parties (tribes only) that the Addendum to the Phase Ia archaeological report was available (Appendix D: D-39 to D-43).

In its response to the Addendum to the HPR dated December 21, 2021 (Appendix D: D-44 to D-47), SHPO reiterated its recommendation that the five subdivisions (Richards and Landers Mount Pleasant Subdivision; Wood Creek Estates; Carefree Subdivision; Ridge Hill Trails; and Hill Valley Estates) “within the project’s area of potential effects are eligible for inclusion in the NRHP.”

By letter dated December 28, 2021, the Eastern Shawnee Tribe of Oklahoma stated, in part, that “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe” (Appendix D: D-48).

By letter dated December 29, 2021, the Peoria Tribe of Indians of Oklahoma stated “The Peoria Tribe has no objection at this time to the proposed project” (Appendix D: D-49).

SHPO responded by letter dated January 10, 2022 (Appendix D: D-50 to D-51), stating that:

*“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.”*

In its January 10, 2022, letter, SHPO went on to reiterate its comments regarding the previously recorded archaeological resources, that “*the newly identified archaeological 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.*” SHPO went on to state that 12Ma1077 and 12Ma1078 should be avoided by all ground-disturbing project activities, and that if avoidance is not feasible, a plan for further archaeological investigations of the two sites must be submitted to the Indiana SHPO for review and comment prior to further field investigations.

By letter dated January 12, 2022, the Eastern Shawnee Tribe of Oklahoma responded, stating that, “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe” (Appendix D: D-52).

On February 9, 2022, INDOT-Cultural Resource Office (CRO) sent a letter to the Indiana Division of the FHWA with documentation regarding the eligibility for NRHP listing for the five residential subdivisions: 1) Richards and Landers Mount Pleasant Subdivision; 2) Wood Creek Estates; 3) Carefree Subdivision; 4) Ridge Hill Trails; and 5) Hill Valley Estates. 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 (Appendix D: D-53 to D-76).

By letter dated May 9, 2022, the Indiana Division of FHWA submitted a letter and documentation to the Keeper of the National Register of Historic Places requesting that it provide a “determination of eligibility for the inclusion of four residential subdivisions in Indianapolis, Indiana in the National Register of Historic Places (NRHP) [Appendix D: D-77 to D-89]. All of 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 Mount Pleasant Subdivision, 2) Wood Creek Estates, 3) Ridge Hill Trails, and 4) Hill Valley Estates.”

Determination of Eligibility Notifications dated June 27, 2022, were received from the office of the Keeper of the National Register (Appendix D: D-90 to D-99). In summary, the Determinations of Eligibility for the four subdivisions pursuant to the Notifications are:

- Mount 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

A Second Addendum to the Phase Ia Archaeological Records Check and Reconnaissance Survey Report (Crider 2023) also was prepared to address archaeology resources within areas added to the project footprint. This archaeological survey did not identify any sites. This report will be provided to SHPO and the Tribes for review and comment concurrent with this documentation.

A copy of the abstracts and summaries for the addendum HPR and addendum Phase Ia archaeology reports are included in Appendix E.

No other consulting party responses were received.

### **3. DESCRIBE AFFECTED HISTORIC PROPERTIES**

#### *Carefree Subdivision Historic District*

The Carefree Subdivision Historic District was determined eligible under Criteria A and C under Community Planning and Development and Architecture. It is a Custom Development, as defined in the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form. The Carefree Subdivision is composed of approximately 700 houses, including a variety of period architecture types and styles, curving streets and culs-de-sac, a clubhouse and pool, with a public school abutting the plat. It is located along a major roadway with easy access to churches and commercial buildings. The northernmost edge of the Carefree Subdivision along County Line Road is included within the APE for this project.

The characteristics that qualify the historic district for the NRHP are the features delineated on the various plat plans that make up the subdivision, including the curving roadways and culs-de-sac and the subdivision's ingress/egress points; the large size of the subdivision in terms of number of houses spread across multiple plats; the variation in the types and styles of the houses; the predominantly residential use of land in the historic district; and the presence of a community amenity (the clubhouse and pool).

#### *Ridge Hill Trails, Plat 1 Historic District*

The Ridge Hill Trails, Plat 1 Historic District was determined eligible under Criterion C under Architecture. It is a Custom Development subdivision, as defined in the *Residential Planning and Development in Indiana, 1940-1973* Multiple Property Documentation Form, with a curvilinear plan with a variety of styles and types of houses. The Ridge Hill Trails, Plat 1 is located along a major roadway with easy access to churches and commercial buildings. The southernmost edge of the Ridge Hill Trails, Plat 1 along County Line Road is included within the APE for this project. The characteristics that qualify the historic district for the NRHP are the features delineated on Plat 1, including the network of curving roadways, the subdivision's ingress/egress points, and the large and irregularly sized lots that follow the contours of the hilly terrain, as well as the variation in the types and styles of the houses.

#### *John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002)*

The John Sutton House at 988 N. Bluff Road (IHSSI #081-392-10002) is an Italianate style house that was constructed ca. 1875. It was determined eligible for the NRHP under Criterion C as an excellent example of the Italianate style in White River Township, Johnson County, Indiana.

### **4. DESCRIBE THE UNDERTAKING'S EFFECTS ON HISTORIC PROPERTIES**

#### *Carefree Subdivision Historic District*

In the vicinity of the Carefree Subdivision, the project will widen the existing roadway from two 11-foot-lanes 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. It is anticipated that 0.402 acre of permanent and 0.225 acre of temporary right-of-way will be acquired for the portion of the project within the Carefree Subdivision Historic District. The house lots east of Leisure Lane along this portion of County Line Road are part of the Carefree Subdivision, but are oriented north to County Line Road rather than south into the subdivision. Driveways off of County Line Road connect the houses to the existing roadway.

Right-of-way will be acquired from the lots on the south side of County Line Road; curbs, gutters, and driveway aprons will be built and/or rebuilt as needed. Final right-of-way will be 66 feet from the centerline of County Line Road. Currently the fronts of the houses are approximately 85 feet from the edge of pavement. The project will result in the fronts of the houses being 55 feet from the closest edge of the sidewalk. Trees within 45 feet of the existing edge of pavement in this area will be removed. The number of trees to be removed is estimated at eight (8), but will be finalized as the project design advances. Any trees outside of the 45 feet will remain. The planting of smaller street trees in the grass buffer between the road and sidewalk is under consideration. None of the trees to be impacted in this area are known to pre-date the subdivision; all have grown up since the houses were constructed. None of the trees are present as the result of an overall landscaping plan for the subdivision.

New concrete curb and gutter will be constructed, with curb ramps installed at the southeast and southwest corners of Clubhouse Court and County Line Road. A 150-foot retaining wall is also to be constructed along the south side of County Line Road in front of the clubhouse. The maximum height of the retaining wall will be 8 feet above the existing clubhouse parking lot. County Line Road is at a greater elevation than the parking lot, with a grass side slope as the current embankment. The retaining wall will be visible from the clubhouse, but will have minimal visibility from houses further within the subdivision. No other amenities are proposed in this location. The bridge carrying County Line Road over Buffalo Creek (Structure No. 49-4510F) is adjacent to the northern boundary of the Carefree Subdivision Historic District. This bridge will be replaced with a wider structure to accommodate the wider section of County Line Road.

#### *Ridge Hill Trails, Plat 1 Historic District*

In the vicinity of the Ridge Hill Trails, Plat 1, the project will widen the existing roadway from two 11-foot lanes 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 proposed multi-purpose trail will be asphalt. The new permanent right-of-way will be 65 feet from the centerline of County Line Road, while temporary right-of-way will be 75 feet. Concrete curbs and gutters will be installed on both Ridge Hill Drive and County Line Road. The work along Ridge Hill Drive will not require the removal of any trees lining Ridge Hill Drive. Curb ramps will be installed on the northwest and northeast corners of Ridge Hill Drive and County Line Road. A detention basin is planned on the south side of County Line Road just to the west of Ridge Hill Trails, Plat 1, in what is presently a cultivated field. No other amenities are proposed in this location. It is anticipated that 0.509 acre of permanent and 0.168 acre of temporary right-of-way will be acquired for the portion of the project within the Ridge Hill Trails, Plat 1 Historic District.

The proposed improvements of this undertaking will result in loss of frontage along County Line Road for five contributing lots in Ridge Hill Trails, Plat 1. The lots are part of the original design of the plat, although three of the five houses were built post-1972 and are not yet 50 years of age. The County Line Road frontage actually forms part of the rear or side yards of these lots and will not change the setback of the houses where they face into the subdivision. Therefore, the loss of frontage along County Line Road will not diminish the integrity of the characteristics that qualify the Ridge Hill Trails, Plat 1 Historic District for the NRHP. Trees presently line County Line Road at the rear or side of the contributing lots. These trees appear to have been planted as privacy or noise screening along County Line Road, rather than retained as part of the natural environment within the subdivision or planted as part of an overall landscaping plan for the subdivision, and do not contribute to the significance of the historic district. Many of the trees along County Line Road will be removed. However, property owners will be offered the opportunity to

have new trees planted beyond the new right-of-way to offset the loss of the existing trees. In addition, existing Ridge Hill Trails signs located on either side of Ridge Hill Drive at County Line Road will need to be relocated out of the construction limits. Moving these signs to a new location, but still comparable in relation to each roadway as previous, will not diminish the character of these features.

*John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002)*

The undertaking will not directly affect the John Sutton House. One of the existing entrances to the Richards and Landers Mount Pleasant Subdivision, located to the east, is being removed as a result of this project. A new connector road is being planned to create safe ingress and egress for the Richards and Landers Mount Pleasant Subdivision, which will be an extension of Mount Pleasant South Street west to Bluff Road. The proposed connector road will intersect Bluff Road opposite the John Sutton House. As no road is currently present at this location, the proposed connector road will be a new visual element in the setting of the John Sutton House. The undertaking will acquire no right-of-way from the John Sutton House.

The newly constructed road will extend approximately 425 feet west from the intersection of Mount Pleasant West Street and Mount Pleasant South Street, where it will connect with N. Bluff Road immediately opposite of the John Sutton House at 988 N. Bluff Road. The road will have two 11-foot lanes. In addition to the road, a 70-foot by 50-foot infiltration pond will be built at the southwest corner of the newly created intersection of Mount Pleasant West Street and Mount Pleasant South Street. The construction of the intersection will require right-of-way from each of the four corners, as well as right-of-way from the lots at 975 N. Bluff Road and 953 N. Bluff Road, the parcels to the north and south, respectively, of the planned access road. No right-of-way will be needed from the John Sutton House.

**5. EXPLAIN APPLICATION OF CRITERIA OF ADVERSE EFFECT -- INCLUDE CONDITIONS OR FUTURE ACTIONS TO AVOID, MINIMIZE OR MITIGATE ADVERSE EFFECTS**

According to 36 CFR 800.5(a)(1), “an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” The criteria of adverse effect as defined in 36 CFR 800.5(a)(1) do not apply to this project. The citations included below are examples of Adverse Effects and not the criteria. Adverse Effects are not limited to these examples.

*Carefree Subdivision Historic District*

Per 36 CFR 800.5(a)(2)(i), the undertaking will not result in the “physical destruction of or damage to all or part of the property.” The undertaking will not cause physical destruction or damage to any contributing resource of the Carefree Subdivision Historic District. The properties from which right-of-way will be acquired contribute to the historic district. The right-of-way acquisition will not result in the removal of any of the contributing houses. None of the trees to be impacted are specimen trees retained during the construction of the subdivision, nor were any planted as part of an overall landscaping plan for the subdivision. The construction of the retaining wall will not remove any contributing feature of the subdivision, nor will the wall impact the clubhouse or its recreational activities. The acquisition of right-of-way from the north edge of the subdivision will not destroy, remove, or alter physical features that contribute to its significance.

Per 36 CFR 800.5(a)(2)(ii), the undertaking will not result in the “alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties and/or other applicable guidelines.” The undertaking will not physically alter any contributing resource of the Carefree Subdivision Historic District.

Per 36 CFR 800.5(a)(2)(iii), the undertaking will not result in the “removal of the property from its historic location.” The project will not remove any contributing resource of the Carefree Subdivision Historic District from its historic location.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.” The undertaking will not change the use of any contributing resource within the Carefree Subdivision Historic District, nor will the project require the removal or alteration of any physical features that contribute to the historic district’s significance. The properties from which right-of-way will be acquired contribute to the historic district. Although the right-of-way acquisition will diminish the depth of the houses’ front yards, their setback from County Line Road is not a physical feature that contributes to their significance. Some trees will be removed, but the trees are not physical features that contribute to the houses’ significance. In addition, none of the trees predate the subdivision or were planted as part of an overall landscape design for the subdivision. The trees are not physical features that contribute to the subdivision’s historic significance. The undertaking will not impact the layout of curvilinear roads and culs-de-sac that characterize the subdivision, nor will the undertaking alter the use of the community clubhouse and pool or the residential use of any of the houses. The bridge carrying County Line Road over Buffalo Creek (Structure No. 49-4510F) is not part of the design of the subdivision and does not contribute to the historic significance of the subdivision.

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” The project will not introduce new atmospheric or audible elements into the historic district. There will be visual changes with the changes in the road width, the replacement of the existing County Line Road bridge over Buffalo Creek (Structure No. 49-4510F), and the addition of a 6-foot-wide sidewalk. County Line Road will be wider as a result of this project, but it is already a busy arterial road bordering the subdivision on its north end, which is not characteristic of the narrow curving internal roadways that characterize the subdivision. The retaining wall supporting County Line Road in front of the clubhouse will be visible to only a very small portion of the subdivision, mostly the clubhouse. The elevation of County Line Road is already higher than the parking lot; replacement of the existing side slope with a retaining wall will not further restrict views looking north from the subdivision. These elements will not have an adverse effect on the district.

Per 36 CFR 800.5(a)(2)(vi), the undertaking will not cause the “neglect of a property which causes its deterioration...” The undertaking will not cause neglect of any contributing resource of the Carefree Subdivision Historic District.

Per 36 CFR 800.5(a)(2)(vii), the undertaking will not cause the “transfer, lease, or sale of property out of Federal ownership or control...” Ownership of contributing resources of the Carefree Subdivision Historic District will not change as a result of this project.

Therefore, the undertaking will have No Adverse Effect on the Carefree Subdivision Historic District.

*Ridge Hill Trails, Plat 1 Historic District*

Per 36 CFR 800.5(a)(2)(i), the undertaking will not result in the “physical destruction of or damage to all or part of the property.” The undertaking will not cause physical destruction or damage to any contributing resource of the Ridge Hill Trails, Plat 1 Historic District. The five lots that adjoin County Line Road contribute to the significance of the historic district. However, none of the houses on these lots will be destroyed or damaged, nor will their spatial relation to the interior roads of the subdivision change. The acquisition of right-of-way along County Line Road will not remove a character-defining setback from the road. The trees that will be impacted by the project do not contribute to the significance of the historic district. The Ridge Hill Trails signs will be moved out of the new right-of-way and will not be destroyed.

Per 36 CFR 800.5(a)(2)(ii), the undertaking will not result in the “alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties and/or other applicable guidelines.” The undertaking will not physically alter any contributing resource of the Ridge Hill Trails, Plat 1 Historic District. The five lots that adjoin County Line Road contribute to the significance of the historic district. However, none of the houses on these lots will be altered. The size of the lots will be reduced, but the houses’ setback and orientation to the interior roads within the subdivision will not change. The trees along County Line Road do not contribute to the historic district’s significance.

Per 36 CFR 800.5(a)(2)(iii), the undertaking will not result in the “removal of the property from its historic location.” The project will not remove any contributing resource of the Ridge Hill Trails, Plat 1 Historic District from its historic location.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.” The undertaking will not change the use of any contributing resource within the Ridge Hill Trails, Plat 1 Historic District, nor will the project require the removal or alteration of any physical features that contribute to the historic district’s significance. Although right-of-way along County Line Road will be acquired from the rear or side of the contributing lots along the south edge of the subdivision, the depth of these yards along County Line Road is not a physical feature that contributes to the historic character of the subdivision. The size of the lots will be diminished a small amount, but will still retain enough size to be distinguishable from the much smaller lots of the later plats of the subdivision. The trees along County Line Road appear for the most part to have been planted as visual and noise screening and not retained from the earlier landscape. These trees are not physical features that contribute to the historic character of the historic district. However, the option of having replacement trees planted will be offered to the property owners to replicate the function of the removed trees. The subdivision signs located at County Line Road and Ridge Hill Drive will be moved to a comparable location in relation to the roadways as the existing, and the undertaking will not diminish the character of these features.

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” The project will not introduce new atmospheric or audible elements into the historic district. There will be visual changes with the changes in the road width along the south edge of the subdivision, and the addition of a 10-foot-wide multi-purpose trail along the north side of County Line Road. However, County Line Road is not in the primary view from any of the five houses, all of which face internally into the subdivision. Similarly, the detention basin planned on the south side of County Line Road is not in the primary view of

the houses closest to the road. The location of the detention basin is currently part of an agricultural field and does not provide a significant southward vista as viewed from Ridge Hill Drive. Trees will be removed from the south edge of these lots; however, these trees are not physical features that contribute to the significance of the historic district, and property owners will have the opportunity to have new trees planted outside of the new right-of-way.

Per 36 CFR 800.5(a)(2)(vi), the undertaking will not cause the “neglect of a property which causes its deterioration...” The undertaking will not cause neglect of any contributing resource of the Ridge Hill Trails, Plat 1 Historic District.

Per 36 CFR 800.5(a)(2)(vii), the undertaking will not cause the “transfer, lease, or sale of property out of Federal ownership or control...” Ownership of contributing resources of the Ridge Hill Trails, Plat 1 Historic District will not change as a result of this project.

Therefore, the undertaking will have No Adverse Effect on the Ridge Hill Trails, Plat 1 Historic District.

*John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002)*

Per 36 CFR 800.5(a)(2)(i), the undertaking will not result in the “physical destruction of or damage to all or part of the property.” The undertaking will not physically affect the John Sutton House. The proposed connector road will end opposite the John Sutton House, and, as a result, the project will not result in physical destruction or damage to this house.

Per 36 CFR 800.5(a)(2)(ii), the undertaking will not result in the “alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties and/or other applicable guidelines.” The undertaking will not physically affect the John Sutton House.

Per 36 CFR 800.5(a)(2)(iii), the undertaking will not result in the “removal of the property from its historic location.” The project will not remove this house from its historic location.

Per 36 CFR 800.5(a)(2)(iv), the undertaking will not result in the “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance.” The undertaking will not cause a change in use of the John Sutton House. The location of the proposed connector road is on the opposite side of Bluff Road, and therefore, the connector road will not impact physical features that contribute to the house’s historic significance.

Per 36 CFR 800.5(a)(2)(v), the undertaking will not result in the “Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features.” As the connector road will be used primarily by existing residents of the Richards and Landers Mount Pleasant Subdivision, it is anticipated that there will be only a slight increase in traffic on Bluff Road in this vicinity. However, Bluff Road currently is open to through traffic, and the undertaking will not introduce an intrusive new visual element that will diminish the integrity of setting of the John Sutton House. The infiltration pond will be set back from Bluff Road with the houses of the Richards and Landers Mount Pleasant Subdivision as a backdrop. As a result, the pond will not be a prominent visual element in the landscape as viewed from the west. In addition, the Mount Pleasant subdivision and most or all of the houses on the east side of Bluff Road are significantly younger than the John Sutton House, and therefore

do not contribute to its setting. As a result, an alteration such as a new connector road or the infiltration pond does not diminish the setting of the John Sutton House, nor will the project introduce new atmospheric or audible elements to the setting of this house.

Per 36 CFR 800.5(a)(2)(vi), the undertaking will not cause the “neglect of a property which causes its deterioration...” The undertaking will not cause neglect of the John Sutton House.

Per 36 CFR 800.5(a)(2)(vii), the undertaking will not cause the “transfer, lease, or sale of property out of Federal ownership or control...” Ownership of the John Sutton House will not change as a result of this project.

Therefore, the undertaking will have No Adverse Effect on the John Sutton House.

## **6. SUMMARY OF CONSULTING PARTIES AND PUBLIC VIEWS**

The early coordination letter was distributed to potential consulting parties on February 16, 2021 (Appendix D: D-4 to D-15). By letter and email dated February 16, 2021, Indiana Landmarks accepted consulting party status (Appendix D: D-16 to D-17). SHPO responded by letter dated February 25, 2021, and requested to be notified of those who accepted consulting party status with the next correspondence (Appendix D: D-18 to D-19). The Miami Tribe of Oklahoma responded by letter dated March 18, 2021, and accepted consulting party status (Appendix D: D-20). The list of consulting parties included in Appendix D (Appendix D: D-2 to D-3) has been annotated to indicate those consulting parties that accepted consulting party status, as requested by the SHPO in its letter.

No other consulting party responses were received.

A letter distributed on June 3, 2021, notified consulting parties that a historic property report (HPR) and an archaeology report (tribes only) were available for review and comment (Appendix D: D-21 to D-26).

In its response to the HPR dated July 6, 2021 (revised July 15, 2021) [Appendix D: D-27 to D-32], the Indiana State Historic Preservation Office (SHPO) stated that five subdivisions located within the APE for this project were eligible for the NRHP, as listed below:

- Richards and Landers Mount Pleasant Subdivision
- Wood Creek Estates
- Carefree Subdivision
- Ridge Hill Trails
- Royal Meadows/Hill Valley Estates

With regard to archaeological resources, in its July 6, 2021 (revised July 15, 2021), response (Appendix D: D-27 to D-32), SHPO stated its concurrence “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.” The letter went on to state that, “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.” SHPO requested that 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.”

By letter dated August 3, 2021, the Eastern Shawnee Tribe of Oklahoma stated, in part, that “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe. Please continue project as planned” (Appendix D: D-33).

By letter dated November 23, 2021, the Addendum to the HPR was distributed to consulting parties (Appendix D: D-34 to D-38).

A letter dated December 20, 2021, was distributed by emails dated December 21, 2021, advising consulting parties (tribes only) that the Addendum to the Phase Ia archaeological report was available (Appendix D: D-39 to D-43).

In its response to the Addendum to the HPR dated December 21, 2021 (Appendix D: D-44 to D-47), SHPO reiterated its recommendation that the five subdivisions (Richards and Landers Mount Pleasant Subdivision; Wood Creek Estates; Carefree Subdivision; Ridge Hill Trails; and Hill Valley Estates) “within the project’s area of potential effects are eligible for inclusion in the NRHP.”

By letter dated December 28, 2021, the Eastern Shawnee of Oklahoma stated, in part, that “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe” (Appendix D: D-48).

By letter dated December 29, 2021, the Peoria Tribe of Indians of Oklahoma stated “The Peoria Tribe has no objection at this time to the proposed project” (Appendix D: D-49).

SHPO responded by letter dated January 10, 2022 (Appendix D: D-50 to D-51), stating that:

*“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.”*

In its January 10, 2022, letter, SHPO went on to reiterate its comments regarding the previously recorded archaeological resources, that *“the newly identified archaeological 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.”* SHPO went on to state that 12Ma1077 and 12Ma1078 should be avoided by all ground-disturbing project activities, and that if avoidance is not feasible, a plan for further archaeological investigations of the two sites must be submitted to the Indiana SHPO for review and comment prior to further field investigations.

By letter dated January 12, 2022, the Eastern Shawnee Tribe of Oklahoma responded, stating that, “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe” (Appendix D: D-52).

No other consulting party comments were received in regard to the addendum reports.

On February 9, 2022, INDOT-Cultural Resource Office (CRO) sent a letter to the Indiana Division of the FHWA with documentation regarding the eligibility for NRHP listing for the five residential subdivisions: 1) Richards and Landers Mount Pleasant Subdivision; 2) Wood Creek Estates; 3) Carefree Subdivision; 4) Ridge Hill Trails; and 5) Hill Valley Estates. 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 (Appendix D: D-53 to D-76).

By letter dated May 9, 2022, the Indiana Division of FHWA submitted a letter and documentation to the Keeper of the National Register of Historic Places requesting that it provide a “determination of eligibility for the inclusion of four residential subdivisions in Indianapolis, Indiana in the National Register of Historic Places (NRHP) [Appendix D: D-77 to D-89]. All of 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 Mount Pleasant Subdivision, 2) Wood Creek Estates, 3) Ridge Hill Trails, and 4) Hill Valley Estates.”

Determination of Eligibility Notifications dated June 27, 2022, were received from the office of the Keeper of the National Register (Appendix D: D-90 to D-99). In summary, the Determinations of Eligibility for the four subdivisions pursuant to the Notifications are:

- Mount 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

By letter and email dated January 17, 2023, an Assessment of Effects report was distributed to the consulting parties (Appendix D: D-100 to D-107).

By letter dated February 13, 2023, the Eastern Shawnee Tribe of Oklahoma responded, stating that, “the project proposes No Adverse Effect or endangerment to known sites of interest to the Eastern Shawnee Tribe” (Appendix D: D-108).

By letter dated February 14, 2022 [an error for 2023], the SHPO concurred that the following historic properties are located within the APE: Carefree Subdivision Historic District; Ridge Hill Trails, Plat 1 Historic District; and the John Sutton House, 988 N. Bluff Road (IHSSI #081-392-10002) [Appendix D: D-109 to D-110]. The SHPO also concurred that the project as proposed will not adversely affect the historic properties. The SHPO repeated its previous comments regarding the archaeological resources, namely that there is insufficient information to determine whether or not sites 12Ma1077, 12Ma1078, and 12Ma1082 are eligible for the NRHP as their site boundaries extend beyond the limits surveyed. The SHPO asked that the surveyed limits be clearly marked so that the unsurveyed portions of these sites are avoided by all ground-disturbing activities.

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

## **APPENDIX**

- Appendix A: Maps
- Appendix B: Plan sheets
- Appendix C: Photographs
- Appendix D: Consulting Parties List and Correspondence
- Appendix E: Abstracts and Summaries for HPR, Addendum HPR, Phase Ia Archaeological Report, and Addendum Archaeological Reports