

**Categorical Exclusion**  
**Appendix C**  
**Early Coordination**

March 13, 2020

**Example Early Coordination Letter**

«Agency\_1»  
«Agency\_2»  
«Address\_1»  
«Address\_2»  
City», «State» «Zip»

Re: Agencies Early Coordination  
Des. Number 1700121  
Road Rehabilitation Project  
US 231, from approximately 0.03 mile south of SR 240 to Frazier Street along US 231  
Greencastle, Putnam County, Indiana

Dear «Position»,

The Indiana Department of Transportation (INDOT) Crawfordsville District and the Federal Highway Administration (FHWA) propose to proceed with a road rehabilitation project located on United States Highway (US) 231 through the City of Greencastle in Putnam County, Indiana (Des. Number 1700121). The FHWA is providing funds and is designated as the lead Federal agency. This letter is part of the early coordination phase of the environmental review process; we are requesting comments from your area of expertise regarding any possible environmental effects associated with this project. **Please use the above Des. Number and description in your reply** and we will incorporate your comments into the formal environmental study.

The project is located on US 231 (also identified locally as Bloomington Street, Jackson Street, and Washington Street) and will extend from approximately 0.03 mile south of State Road (SR) 240 northward to Frazier Street, for a total length of approximately 1.64 miles. The project is within Greencastle Township, Sections 16,21, and 28 of Township 14 North, and Range 4 West of the Greencastle U.S. Geological Survey (USGS) Quadrangle. See Appendix A for project area maps.

This section of US 231 is classified as Other Principal Arterial and is part of the National Highway System (NHS). US 231 is also on the National Truck Network. Within the project area, US 231 consists of two 12-foot wide travel lanes with 1 to 2-foot wide curb offsets, and 1-foot to 4-foot 9-inch wide paved shoulders. At the intersecting roadways, the right and left turn lanes of US 231 are a minimum 11-foot wide. On the north approach to Elizabeth Street, an existing 12-foot wide right turn lane with 1-foot wide paved shoulder is present. Sidewalks are present throughout the project area and vary in width from 4-feet to 10-feet. An at-grade railroad crossing is located at the north end of the project area. Existing drainage is primarily conveyed by curb and gutter sections that drain into an enclosed storm sewer system. The existing right-of-way width along US 231 is approximately 60-feet wide throughout the project area.

The need for the project is due to the deteriorating condition of the existing pavement and poor drainage within the project area. From the beginning of the project north to Washington Street (approximately 0.67 mile in length), there is fatigue cracking in the wheel path and near the curb line of the roadway pavement, and reflective cracking from the underlying concrete and age hardening of the asphalt surface material. From Washington Street north to the at-grade railroad crossing (approximately 0.80 mile in length), there is severe pavement distress due to an old deteriorating water line utility and problems with the existing storm water drainage system. The pavement has been patched on a regular basis because of utility line failures. Recent maintenance paving activities have improved the pavement, but fatigue cracking and pumping of the subgrade material has been evident since maintenance work was completed two years ago. From the at-grade railroad crossing north to the end of the project (approximately

0.17 mile in length), there is fatigue cracking in the wheel path of the roadway pavement. Some of the existing sidewalks and curb ramps within the project area are deteriorated. The purpose of the project is to improve the condition of the pavement and drainage issues.

The current proposed project would involve a functional Hot Mix Asphalt (HMA) overlay from the beginning of the project northward to Washington Street and pavement replacement from Washington Street north to the at-grade railroad crossing. Due to the increase in profile grade within the limits of the functional overlay, curb and gutter replacement would be needed. From the at-grade railroad crossing north to the end of the project, pavement would be milled, patched, and resurfaced. All existing pedestrian facilities within the project area would be analyzed to determine if they meet current ADA criteria. The existing water main located under US 231 along Jackson and Washington Streets would be replaced. No work within the railroad right-of-way will take place. See Appendix C for preliminary design plans.

Approximately 0.2 acre of permanent and 1.6 acres of temporary right-of-way would be needed for the project. Construction is anticipated to be let in 2022. The maintenance of traffic (MOT) from the beginning of the project to Washington Street and from the at grade railroad crossing to the end of the project would consist of phased construction to allow for a one-lane, two-way operation utilizing a flagger. The MOT from Washington Street north to the at-grade railroad crossing would utilize state and local detour routes along with the allowance for one-way travel along US 231 during construction. Construction along this segment would be phased to ensure this segment of roadway is not under construction all at once.

To identify potential environmental concerns within the project vicinity, a Red Flag Investigation was performed for a 0.5 mile radius of the project area by RQAW. The Red Flag Investigation noted the following:

- St. Paul the Apostle Church, St. Andrew's Episcopal Church, and Cornerstone Baptist Church are adjacent to the project area
- Putnam County Airport within 3.8 miles of the project area
- DePauw University is adjacent to the project area
- Robe Ann Park is within the project area
- Two pipeline segments cross the project area
- One railroad is located within the project area
- Five trail segments, one under development and four planned, are within the project area
- The project area is within an urbanized area boundary (UAB)
- Several hazardous material concerns are mapped within and/or adjacent to the project area

Coordination with respective agencies/owners of the above is occurring. Multiple Phase II Environmental Site Assessments (ESAs) are recommended due to the presence of several hazardous material concerns within and/or adjacent to the project area. See Appendix A for the Red Flag Investigation Maps.

RQAW performed field visits on August 10, 2018 and April 22, 2019 to identify any ecological resources present within the project area. No streams or wetlands were observed adjacent to or within the project area. The project will take place within a developed area surrounded by commercial, residential, recreational (Robe Ann Park), and educational (DePauw University) properties.

The project qualifies for the application of the U.S. Fish and Wildlife Service (USFWS) range-wide programmatic informal consultation for the Indiana bat and northern long-eared bat. Project information is being submitted through the USFWS Information for Planning and Consultation (IPaC) separately.

RQAW is also investigating the Area of Potential Effect (APE) for archaeological and historic resources for compliance with Section 106. Coordination with the Indiana State Historic Preservation Officer (SHPO) will occur.

If we do not receive your response within 30 calendar days from the date of this letter, it will be assumed your agency feels there will be no adverse effects incurred because of the project. However, if you feel an extension to the response time is necessary, a reasonable amount may be granted upon request. If a questionnaire follows this letter, please complete. If you have any questions regarding this matter, please contact Stephanie Verhoff of the Environmental Department at RQAW, at 317.588.1798 or at [sverhoff@rqaw.com](mailto:sverhoff@rqaw.com), or the INDOT Project Manager, Steven Walls, at 765-361-5237 or at [swalls@indot.in.gov](mailto:swalls@indot.in.gov). Thank you in advance for your input.

Sincerely,



Stephanie Verhoff  
RQAW Environmental Department

Appendices: **Omitted to avoid duplication. See graphics in Appendices B and E of this CE document.**

- Appendix A: Red Flag Investigation Maps
- Appendix B: Photograph Key and Photographs
- Appendix C: Preliminary Plans

Cc:

- INDOT Crawfordsville District (electronic coordination)
- Federal Highway Administration (electronic coordination)
- Natural Resources Conservation Service (electronic coordination)
- Indiana Geological Survey (electronic submission)
- IDNR Division of Fish and Wildlife (electronic coordination)
- IDEM (electronic submission)
- IDEM Ground Water Section (electronic query)
- INDOT Office of Public Involvement (electronic coordination)
- U.S. Department of Housing and Urban Development (electronic coordination)
- INDOT Office of Aviation (electronic coordination)
- IDNR Division of Outdoor Recreation (electronic coordination)
- National Park Service, Midwest Regional Office (U.S. Postal Service)
- Putnam County Council (U.S. Postal Service)
- Putnam County Board of Commissioners (U.S. Postal Service)
- Putnam County Surveyor's Office (U.S. Postal Service)
- Putnam County Highway Department (U.S. Postal Service)
- City of Greencastle Mayor's Office (U.S. Postal Service)
- City of Greencastle Department of Public Works (U.S. Postal Service)
- St. Paul the Apostle Church (U.S. Postal Service)
- St. Andrew's Episcopal Church (U.S. Postal Service)
- Cornerstone Baptist Church (U.S. Postal Service)
- DePauw University (U.S. Postal Service)
- City of Greencastle Park Board (U.S. Postal Service)
- People Pathways (U.S. Postal Service)
- City of Greencastle Municipal Separate Storm Sewer System (MS4) Coordinator (U.S. Postal Service)
- West Central Indiana Economic Development District, Inc. (U.S. Postal Service)
- U.S. Fish and Wildlife Service (electronic coordination) (sent on June 25, 2020)



# Indiana Department of Environmental Management

*We Protect Hoosiers and Our Environment.*

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100 North Senate Avenue - Indianapolis, IN 46204  
(800) 451-6027 - (317) 232-8603 - [www.idem.IN.gov](http://www.idem.IN.gov)

INDOT Crawfordsville

41 West 300 North  
Crawfordsville , IN 47933

Date: March 13, 2020

To Engineers and Consultants Proposing Roadway Construction Projects:

RQAW

Stephanie Verhoff  
8770 North St.  
Ste. 110  
Fishers , IN 46038

RE: The Indiana Department of Transportation (INDOT) Crawfordsville District and the Federal Highway Administration (FHWA) propose to proceed with a road rehabilitation project located on United States Highway (US) 231 through the City of Greencastle in Putnam County, Indiana (Des. Number 1700121). The project is located on US 231 (also identified locally as Bloomington Street, Jackson Street, and Washington Street) and will extend from approximately 0.03 mile south of State Road (SR) 240 northward to Frazier Street, for a total length of approximately 1.64 miles. Within the project area, US 231 consists of two 12-foot wide travel lanes with 1 to 2-foot wide curb offsets, and 1-foot to 4-foot 9-inch wide paved shoulders. At the intersecting roadways, the right and left turn lanes of US 231 are a minimum 11-foot wide. On the north approach to Elizabeth Street, an existing 12-foot wide right turn lane with 1-foot wide paved shoulder is present. Sidewalks are present throughout the project area and vary in width from 4-feet to 10-feet. An at-grade railroad crossing is located at the north end of the project area. Existing drainage is primarily conveyed by curb and gutter sections that drain into an enclosed storm sewer system. The existing right-of-way width along US 231 is approximately 60-feet wide throughout the project area. Construction is anticipated to be let in 2022. The current proposed project would involve a functional Hot Mix Asphalt (HMA) overlay from the beginning of the project northward to Washington Street and pavement replacement from Washington Street north to the at-grade railroad crossing. Due to the increase in profile grade within the limits of the functional overlay, curb and gutter replacement would be needed. From the at-grade railroad crossing north to the end of the project, pavement would be milled, patched, and resurfaced. All existing pedestrian facilities within the project area would be analyzed to determine if they meet current ADA criteria. The existing water main located under US 231 along Jackson and Washington Streets would be replaced. No work within the railroad right-of-way will take place. Approximately 0.2 acre of permanent and 1.6 acres of temporary right-of-way would be needed for the project. The maintenance of traffic (MOT) from the beginning of the project to Washington Street and from the at grade railroad crossing to the end of the project would consist of phased construction to allow for a one-lane, two-way operation utilizing a flagger. The MOT from Washington Street north to the at-grade railroad crossing would utilize state and local detour routes along with the allowance for one-way travel along US 231 during construction. Construction along this segment would be phased to ensure this segment of roadway is not under construction all at once. RQAW performed a site visit and no streams or wetlands were observed within the project area.

This letter from the Indiana Department of Environmental Management (IDEM) serves as a standardized response to enquiries inviting IDEM comments on roadway construction, reconstruction, or other improvement projects within existing roadway corridors when the proposed scope of the project is beneath the threshold requiring a formal National Environmental Policy Act-mandated Environmental Assessment or Environmental Impact Statement. As the letter attempts to address all roadway-related environmental topics of potential concern, it is possible that not every topic addressed in the letter will be applicable to your particular roadway project.

For additional information on specific roadway-related topics of interest, please visit the appropriate Web pages cited below, many of which provide contact information for persons within the various program areas who can answer questions not fully addressed in this letter. Also please be mindful that some environmental requirements may be subject to change and so each person intending to include a copy of this letter in their project documentation packet is advised to download the most recently revised version of the letter; found at: <http://www.in.gov/idem/5283.htm> (<http://www.in.gov/idem/5283.htm>).

To ensure that all environmentally-related issues are adequately addressed, IDEM recommends that you read this letter in its entirety, and consider each of the following issues as you move forward with the planning of your proposed roadway construction, reconstruction, or improvement project:

## WATER AND BIOTIC QUALITY

1. Section 404 of the Clean Water Act requires that you obtain a permit from the U.S. Army Corps of Engineers (USACE) before discharging dredged or fill materials into any wetlands or other waters, such as rivers, lakes, streams, and ditches. Other activities regulated include the relocation, channelization, widening, or other such alteration of a stream, and the mechanical clearing (use of heavy construction equipment) of wetlands. Thus, as a project owner or sponsor, it is your responsibility to ensure that no wetlands are disturbed without the proper permit. Although you may initially refer to the U.S. Fish and Wildlife Service National Wetland Inventory maps as a means of identifying potential areas of concern, please be mindful that those maps do not depict jurisdictional wetlands regulated by the USACE or the Department of Environmental Management. A valid jurisdictional wetlands determination can only be made by the USACE, using the 1987 Wetland Delineation Manual.

USACE recommends that you have a consultant check to determine whether your project will abut, or lie within, a wetland area. To view a list of consultants that have requested to be included on a list posted by the USACE on their Web site, see USACE Permits and Public Notices (<http://www.lrl.usace.army.mil/orf/default.asp>) (<http://www.lrl.usace.army.mil/orf/default.asp>) and then click on "Information" from the menu on the right-hand side of that page. Their "Consultant List" is the fourth entry down on the "Information" page. Please note that the USACE posts all consultants that request to appear on the list, and that inclusion of any particular consultant on the list does not represent an endorsement of that consultant by the USACE, or by IDEM.

Much of northern Indiana (Newton, Lake, Porter, LaPorte, St. Joseph, Elkhart, LaGrange, Steuben, and Dekalb counties; large portions of Jasper, Starke, Marshall, Noble, Allen, and Adams counties; and lesser portions of Benton, White, Pulaski, Kosciusko, and Wells counties) is served by the USACE District Office in Detroit (313-226-6812). The central and southern portions of the state (large portions of Benton, White, Pulaski, Kosciusko, and Wells counties; smaller portions of Jasper, Starke, Marshall, Noble, Allen, and Adams counties; and all other Indiana counties located in north-central, central, and southern Indiana ) are served by the USACE Louisville District Office (502-315-6733).

Additional information on contacting these U.S. Army Corps of Engineers (USACE) District Offices, government agencies with jurisdiction over wetlands, and other water quality issues, can be found at <http://www.in.gov/idem/4396.htm> (<http://www.in.gov/idem/4396.htm>). IDEM recommends that impacts to wetlands and other water resources be avoided to the fullest extent.

2. In the event a Section 404 wetlands permit is required from the USACE, you also must obtain a Section 401 Water Quality Certification from the IDEM Office of Water Quality Wetlands Program. To learn more about the Wetlands Program, visit: <http://www.in.gov/idem/4384.htm> (<http://www.in.gov/idem/4384.htm>).

3. If the USACE determines that a wetland or other water body is isolated and not subject to Clean Water Act regulation, it is still regulated by the state of Indiana . A State Isolated Wetland permit from IDEM's Office of Water Quality (OWQ) is required for any activity that results in the discharge of dredged or fill materials into isolated wetlands. To learn more about isolated wetlands, contact the OWQ Wetlands Program at 317-233-8488.
4. If your project will involve over a 0.5 acre of wetland impact, stream relocation, or other large-scale alterations to water bodies such as the creation of a dam or a water diversion, you should seek additional input from the OWQ Wetlands Program staff. Consult the Web at: <http://www.in.gov/idem/4384.htm> (<http://www.in.gov/idem/4384.htm>) for the appropriate staff contact to further discuss your project.
5. Work within the one-hundred year floodway of a given water body is regulated by the Department of Natural Resources, Division of Water. The Division issues permits for activities regulated under the follow statutes:
  - IC 14-26-2 Lakes Preservation Act 312 IAC 11
  - IC 14-26-5 Lowering of Ten Acre Lakes Act No related code
  - IC 14-28-1 Flood Control Act 310 IAC 6-1
  - IC 14-29-1 Navigable Waterways Act 312 IAC 6
  - IC 14-29-3 Sand and Gravel Permits Act 312 IAC 6
  - IC 14-29-4 Construction of Channels Act No related code

For information on these Indiana (statutory) Code and Indiana Administrative Code citations, see the DNR Web site at: <http://www.in.gov/dnr/water/9451.htm> (<http://www.in.gov/dnr/water/9451.htm>) . Contact the DNR Division of Water at 317-232-4160 for further information.

The physical disturbance of the stream and riparian vegetation, especially large trees overhanging any affected water bodies should be limited to only that which is absolutely necessary to complete the project. The shade provided by the large overhanging trees helps maintain proper stream temperatures and dissolved oxygen for aquatic life.

6. For projects involving construction activity (which includes clearing, grading, excavation and other land disturbing activities) that result in the disturbance of one (1), or more, acres of total land area, contact the Office of Water Quality – Watershed Planning Branch (317/233-1864) regarding the need for of a Rule 5 Storm Water Runoff Permit. Visit the following Web page
  - <http://www.in.gov/idem/4902.htm> (<http://www.in.gov/idem/4902.htm>)

To obtain, and operate under, a Rule 5 permit you will first need to develop a Construction Plan (<http://www.in.gov/idem/4917.htm#constreq> (<http://www.in.gov/idem/4917.htm#constreq>)), and as described in 327 IAC 15-5-6.5 (<http://www.in.gov/legislative/iac/T03270/A00150> [PDF] (<http://www.in.gov/legislative/iac/T03270/A00150.PDF>), pages 16 through 19). Before you may apply for a Rule 5 Permit, or begin construction, you must submit your Construction Plan to your county Soil and Water Conservation District (SWCD) (<http://www.in.gov/isda/soil/contacts/map.html> (<http://www.in.gov/isda/soil/contacts/map.html>)).



Upon receipt of the construction plan, personnel of the SWCD or the Indiana Department of Environmental Management will review the plan to determine if it meets the requirements of 327 IAC 15-5. Plans that are deemed deficient will require re-submittal. If the plan is sufficient you will be notified and instructed to submit the verification to IDEM as part of the Rule 5 Notice of Intent (NOI) submittal. Once construction begins, staff of the SWCD or Indiana Department of Environmental Management will perform inspections of activities at the site for compliance with the regulation.

Please be mindful that approximately 149 Municipal Separate Storm Sewer System (MS4) areas are now being established by various local governmental entities throughout the state as part of the implementation of Phase II federal storm water requirements. All of these MS4 areas will eventually take responsibility for Construction Plan review, inspection, and enforcement. As these MS4 areas obtain program approval from IDEM, they will be added to a list of MS4 areas posted on the IDEM Website at: <http://www.in.gov/idem/4900.htm> (<http://www.in.gov/idem/4900.htm>).

If your project is located in an IDEM-approved MS4 area, please contact the local MS4 program about meeting their storm water requirements. Once the MS4 approves the plan, the NOI can be submitted to IDEM.

Regardless of the size of your project, or which agency you work with to meet storm water requirements, IDEM recommends that appropriate structures and techniques be utilized both during the construction phase, and after completion of the project, to minimize the impacts associated with storm water runoff. The use of appropriate planning and site development and appropriate storm water quality measures are recommended to prevent soil from leaving the construction site during active land disturbance and for post construction water quality concerns. Information and assistance regarding storm water related to construction activities are available from the Soil and Water Conservation District (SWCD) offices in each county or from IDEM.

7. For projects involving impacts to fish and botanical resources, contact the Department of Natural Resources - Division of Fish and Wildlife (317/232-4080) for addition project input.
8. For projects involving water main construction, water main extensions, and new public water supplies, contact the Office of Water Quality - Drinking Water Branch (317-308-3299) regarding the need for permits.
9. For projects involving effluent discharges to waters of the State of Indiana , contact the Office of Water Quality - Permits Branch (317-233-0468) regarding the need for a National Pollutant Discharge Elimination System (NPDES) permit.
10. For projects involving the construction of wastewater facilities and sewer lines, contact the Office of Water Quality - Permits Branch (317-232-8675) regarding the need for permits.

## **AIR QUALITY**

The above-noted project should be designed to minimize any impact on ambient air quality in, or near, the project area. The project must comply with all federal and state air pollution regulations.

Consideration should be given to the following:

1. Regarding open burning, and disposing of organic debris generated by land clearing activities; some types of open burning are allowed (<http://www.in.gov/idem/4148.htm> (<http://www.in.gov/idem/4148.htm>)) under specific conditions. You also can seek an open burning variance from IDEM.

However, IDEM generally recommends that you take vegetative wastes to a registered yard waste composting facility or that the waste be chipped or shredded with composting on site (you must register with IDEM if more than 2,000 pounds is to be composted; contact 317/232-0066). The finished compost can then be used as a mulch or soil amendment. You also may bury any vegetative wastes (such as leaves, twigs, branches, limbs, tree trunks and stumps) onsite, although burying large quantities of such material can lead to subsidence problems, later on.

Reasonable precautions must be taken to minimize fugitive dust emissions from construction and demolition activities. For example, wetting the area with water, constructing wind barriers, or treating dusty areas with chemical stabilizers (such as calcium chloride or several other commercial products). Dirt tracked onto paved roads from unpaved areas should be minimized.

Additionally, if construction or demolition is conducted in a wooded area where blackbirds have roosted or abandoned buildings or building sections in which pigeons or bats have roosted for 3-5 years precautionary measures should be taken to avoid an outbreak of histoplasmosis. This disease is caused by the fungus *Histoplasma capsulatum*, which stems from bird or bat droppings that have accumulated in one area for 3-5 years. The spores from this fungus become airborne when the area is disturbed and can cause infections over an entire community downwind of the site. The area should be wetted down prior to cleanup or demolition of the project site. For more detailed information on histoplasmosis prevention and control, please contact the Acute Disease Control Division of the Indiana State Department of Health at (317) 233-7272.

2. The U.S. EPA and the Surgeon General recommend that people not have long-term exposure to radon at levels above 4 pCi/L. (For a county-by-county map of predicted radon levels in Indiana, visit: <http://www.in.gov/idem/4145.htm> (<http://www.in.gov/idem/4145.htm>).)

The U.S. EPA further recommends that all homes (and apartments within three stories of ground level) be tested for radon. If in-home radon levels are determined to be 4 pCi/L, or higher, EPA recommends a follow-up test. If the second test confirms that radon levels are 4 pCi/L, or higher, EPA recommends the installation of radon-reduction measures. (For a list of qualified radon testers and radon mitigation (or reduction) specialists visit:

[http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon\\_testers\\_mitigators\\_list.pdf](http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon_testers_mitigators_list.pdf) ([http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon\\_testers\\_mitigators\\_list.pdf](http://www.in.gov/isdh/regsvcs/radhealth/pdfs/radon_testers_mitigators_list.pdf))). It also is recommended that radon reduction measures be built into all new homes, particularly in areas like Indiana that have moderate to high predicted radon levels.

To learn more about radon, radon risks, and ways to reduce exposure visit:

<http://www.in.gov/isdh/regsvcs/radhealth/radon.htm> (<http://www.in.gov/isdh/regsvcs/radhealth/radon.htm>), <http://www.in.gov/idem/4145.htm> (<http://www.in.gov/idem/4145.htm>), or <http://www.epa.gov/radon/index.html> (<http://www.epa.gov/radon/index.html>).

3. With respect to asbestos removal: all facilities slated for renovation or demolition (except residential buildings that have (4) four or fewer dwelling units and which will not be used for commercial purposes) must be inspected by an Indiana-licensed asbestos inspector prior to the commencement of any renovation or demolition activities. If regulated asbestos-containing material (RACM) that may become airborne is found, any subsequent demolition, renovation, or asbestos removal activities must be performed in accordance with the proper notification and emission control requirements.

If no asbestos is found where a renovation activity will occur, or if the renovation involves removal of less than 260 linear feet of RACM off of pipes, less than 160 square feet of RACM off of other facility components, or less than 35 cubic feet of RACM off of all facility components, the owner or operator of the project does not need to notify IDEM before beginning the renovation activity.

For questions on asbestos demolition and renovation activities, you can also call IDEM's Lead/Asbestos section at 1-888-574-8150.

However, in all cases where a demolition activity will occur (even if no asbestos is found), the owner or operator must still notify IDEM 10 working days prior to the demolition, using the form found at <http://www.in.gov/icpr/webfile/formsdiv/44593.pdf> (<http://www.in.gov/icpr/webfile/formsdiv/44593.pdf>).

Anyone submitting a renovation/demolition notification form will be billed a notification fee based upon the amount of friable asbestos containing material to be removed or demolished. Projects that involve the removal of more than 2,600 linear feet of friable asbestos containing materials on pipes, or 1,600 square feet or 400 cubic feet of friable asbestos containing material on other facility components, will be billed a fee of \$150 per project; projects below these amounts will be billed a fee of \$50 per project. All notification remitters will be billed on a quarterly basis.

For more information about IDEM policy regarding asbestos removal and disposal, visit: <http://www.in.gov/idem/4983.htm> (<http://www.in.gov/idem/4983.htm>).

4. With respect to lead-based paint removal: IDEM encourages all efforts to minimize human exposure to lead-based paint chips and dust. IDEM is particularly concerned that young children exposed to lead can suffer from learning disabilities. Although lead-based paint abatement efforts are not mandatory, any abatement that is conducted within housing built before January 1, 1978 , or a child-occupied facility is required to comply with all lead-based paint work practice standards, licensing and notification requirements. For more information about lead-based paint removal visit: <http://www.in.gov/isdh/19131.htm> (<http://www.in.gov/isdh/19131.htm>).
5. Ensure that asphalt paving plants are permitted and operate properly. The use of cutback asphalt, or asphalt emulsion containing more than seven percent (7%) oil distillate, is prohibited during the months April through October. See 326 IAC 8-5-2 , Asphalt Paving Rule (<http://www.ai.org/legislative/iac/T03260/A00080.PDF> (<http://www.ai.org/legislative/iac/T03260/A00080.PDF>)).
6. If your project involves the construction of a new source of air emissions or the modification of an existing source of air emissions or air pollution control equipment, it will need to be reviewed by

the IDEM Office of Air Quality (OAQ). A registration or permit may be required under 326 IAC 2 (View at: [www.ai.org/legislative/iac/t03260/a00020.pdf](http://www.ai.org/legislative/iac/t03260/a00020.pdf) (<http://www.ai.org/legislative/iac/t03260/a00020.pdf>.) New sources that use or emit hazardous air pollutants may be subject to Section 112 of the Clean Air Act and corresponding state air regulations governing hazardous air pollutants.

7. For more information on air permits visit: <http://www.in.gov/idem/4223.htm> (<http://www.in.gov/idem/4223.htm>), or to initiate the IDEM air permitting process, please contact the Office of Air Quality Permit Reviewer of the Day at (317) 233-0178 or OAMPROD [atdem.state.in.us](mailto:atdem.state.in.us).

## LAND QUALITY

In order to maintain compliance with all applicable laws regarding contamination and/or proper waste disposal, IDEM recommends that:

1. If the site is found to contain any areas used to dispose of solid or hazardous waste, you need to contact the Office of Land Quality (OLQ) at 317-308-3103.
2. All solid wastes generated by the project, or removed from the project site, need to be taken to a properly permitted solid waste processing or disposal facility. For more information, visit <http://www.in.gov/idem/4998.htm> (<http://www.in.gov/idem/4998.htm>).
3. If any contaminated soils are discovered during this project, they may be subject to disposal as hazardous waste. Please contact the OLQ at 317-308-3103 to obtain information on proper disposal procedures.
4. If PCBs are found at this site, please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding management of any PCB wastes from this site.
5. If there are any asbestos disposal issues related to this site, please contact the Industrial Waste Section of OLQ at 317-308-3103 for information regarding the management of asbestos wastes (Asbestos removal is addressed above, under Air Quality).
6. If the project involves the installation or removal of an underground storage tank, or involves contamination from an underground storage tank, you must contact the IDEM Underground Storage Tank program at 317/308-3039. See: <http://www.in.gov/idem/4999.htm> (<http://www.in.gov/idem/4999.htm>).

## FINAL REMARKS

Should you need to obtain any environmental permits in association with this proposed project, please be mindful that IC 13-15-8 requires that you notify all adjoining property owners and/or occupants within ten days your submittal of each permit application. However, if you are seeking multiple permits, you can still meet the notification requirement with a single notice if all required permit applications are submitted with the same ten day period.

Should the scope of the proposed project be expanded to the extent that a National Environmental Policy Act Environmental Assessment (EA) or Environmental Impact Statement (EIS) is required, IDEM will actively participate in any early interagency coordination review of the project.

Meanwhile, please note that this letter does not constitute a permit, license, endorsement or any other form of approval on the part of the Indiana Department of Environmental Management regarding any project for which a copy of this letter is used. Also note that it is the responsibility of the project engineer or consultant using this letter to ensure that the most current draft of this document, which is located at <http://www.in.gov/idem/5284.htm> (<http://www.in.gov/idem/5284.htm>), is used.

---

## Signature(s) of the Applicant

I acknowledge that the following proposed roadway project will be financed in part, or in whole, by public monies.

## Project Description

The Indiana Department of Transportation (INDOT) Crawfordsville District and the Federal Highway Administration (FHWA) propose to proceed with a road rehabilitation project located on United States Highway (US) 231 through the City of Greencastle in Putnam County, Indiana (Des. Number 1700121). The project is located on US 231 (also identified locally as Bloomington Street, Jackson Street, and Washington Street) and will extend from approximately 0.03 mile south of State Road (SR) 240 northward to Frazier Street, for a total length of approximately 1.64 miles. Within the project area, US 231 consists of two 12-foot wide travel lanes with 1 to 2-foot wide curb offsets, and 1-foot to 4-foot 9-inch wide paved shoulders. At the intersecting roadways, the right and left turn lanes of US 231 are a minimum 11-foot wide. On the north approach to Elizabeth Street, an existing 12-foot wide right turn lane with 1-foot wide paved shoulder is present. Sidewalks are present throughout the project area and vary in width from 4-feet to 10-feet. An at-grade railroad crossing is located at the north end of the project area. Existing drainage is primarily conveyed by curb and gutter sections that drain into an enclosed storm sewer system. The existing right-of-way width along US 231 is approximately 60-foot wide throughout the project area. Construction is anticipated to be let in 2022. The current proposed project would involve a functional Hot Mix Asphalt (HMA) overlay from the beginning of the project northward to Washington Street and pavement replacement from Washington Street north to the at-grade railroad crossing. Due to the increase in profile grade within the limits of the functional overlay, curb and gutter replacement would be needed. From the at-grade railroad crossing north to the end of the project, pavement would be milled, patched, and resurfaced. All existing pedestrian facilities within the project area would be analyzed to determine if they meet current ADA criteria. The existing water main located under US 231 along Jackson and Washington Streets would be replaced. No work within the railroad right-of-way will take place. Approximately 0.2 acre of permanent and 1.6 acres of temporary right-of-way would be needed for the project. The maintenance of traffic (MOT) from the beginning of the project to Washington Street and from the at grade railroad crossing to the end of the project would consist of phased construction to allow for a one-lane, two-way operation utilizing a flagger. The MOT from Washington Street north to the at-grade railroad crossing would utilize state and local detour routes along with the allowance for one-way travel along US 231 during construction.

Construction along this segment would be phased to ensure this segment of roadway is not under construction all at once. RQAW performed a site visit and no streams or wetlands were observed within the project area.

With my signature, I do hereby affirm that I have read the letter from the Indiana Department of Environment that appears directly above. In addition, I understand that in order to complete that project in which I am interested, with a minimum of impact to the environment, I must consider all the issues addressed in the aforementioned letter, and further, that I must obtain any required permits.

Date: 07/20/2020

Signature of the INDOT

Project Engineer or Other Responsible Agent



\_\_\_\_\_  
(Lisa Casler)

Date: 07/13/2020

Signature of the  
For Hire Consultant



\_\_\_\_\_  
Stephanie Verhoff



INDIANA  
GEOLOGICAL SURVEY

## Organization and Project Information

**Project ID:**  
**Des. ID:** Des. Number 1700121  
**Project Title:** US 231 Greencastle  
**Name of Organization:** RQAW  
**Requested by:** Stephanie Verhoff

## Environmental Assessment Report

### 1. Geological Hazards:

- Potential Karst
- High liquefaction potential
- Floodway

### 2. Mineral Resources:

- Bedrock Resource: High Potential
- Sand and Gravel Resource: Low Potential

### 3. Active or abandoned mineral resources extraction sites:

- Petroleum Exploration Wells

\*All map layers from Indiana Map ([maps.indiana.edu](http://maps.indiana.edu))

#### **DISCLAIMER:**

This document was compiled by Indiana University, Indiana Geological Survey, using data believed to be accurate; however, a degree of error is inherent in all data. This product is distributed "AS-IS" without warranties of any kind, either expressed or implied, including but not limited to warranties of suitability to a particular purpose or use. No attempt has been made in either the design or production of these data and document to define the limits or jurisdiction of any federal, state, or local government. The data used to assemble this document are intended for use only at the published scale of the source data or smaller (see the metadata links below) and are for reference purposes only. They are not to be construed as a legal document or survey instrument. A detailed on-the-ground survey and historical analysis of a single site may differ from these data and this document.

This information was furnished by Indiana Geological Survey

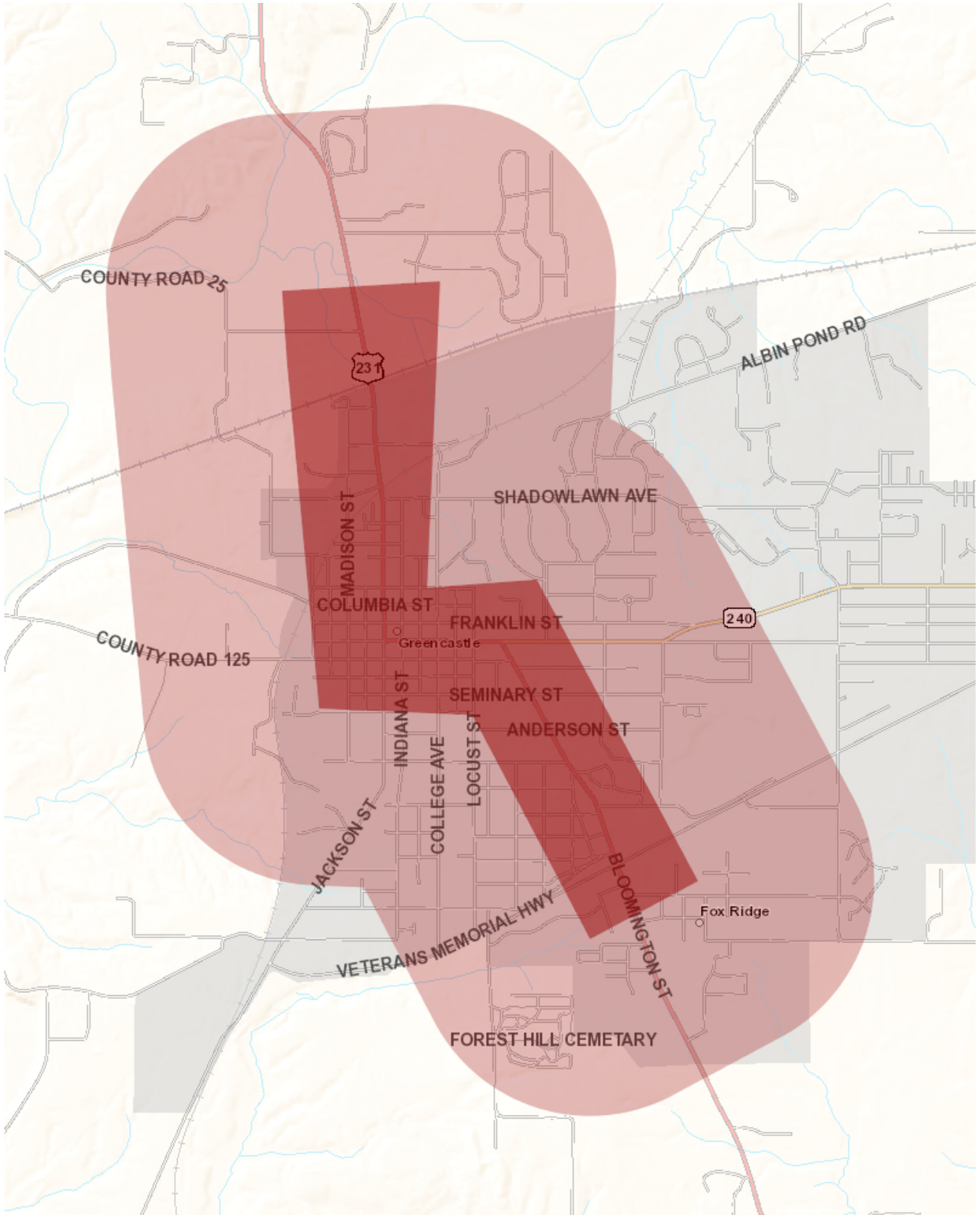
Address: 420 N. Walnut St., Bloomington, IN 47404

Email: IGSEnvir@indiana.edu

Phone: 812 855-7428

Date: March 16, 2020







## Metadata:

- [https://maps.indiana.edu/metadata/Hydrology/Karst\\_Cave\\_Density.html](https://maps.indiana.edu/metadata/Hydrology/Karst_Cave_Density.html)
- [https://maps.indiana.edu/metadata/Geology/Petroleum\\_Wells.html](https://maps.indiana.edu/metadata/Geology/Petroleum_Wells.html)
- [https://maps.indiana.edu/metadata/Geology/Seismic\\_Earthquake\\_Liquefaction\\_Potential.html](https://maps.indiana.edu/metadata/Geology/Seismic_Earthquake_Liquefaction_Potential.html)
- [https://maps.indiana.edu/metadata/Geology/Industrial\\_Minerals\\_Sand\\_Gravel\\_Resources.html](https://maps.indiana.edu/metadata/Geology/Industrial_Minerals_Sand_Gravel_Resources.html)
- [https://maps.indiana.edu/metadata/Hydrology/Floodplains\\_FIRM.html](https://maps.indiana.edu/metadata/Hydrology/Floodplains_FIRM.html)
- [https://maps.indiana.edu/metadata/Geology/Bedrock\\_Geology.html](https://maps.indiana.edu/metadata/Geology/Bedrock_Geology.html)

## Stephanie Verhoff

---

**From:** Courtade, Julian <JCourtade@indot.IN.gov>  
**Sent:** Monday, March 16, 2020 8:09 AM  
**To:** Stephanie Verhoff  
**Subject:** RE: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Stephanie –

After reviewing the Early Coordination Letter, I have determined that if any object, obstruction, or equipment will exceed 100 ft. in height, further coordination will be required with our office. This is due to the close proximity of Putnam County Airport and the need for any obstructions within 5 miles to meet a 100:1 glideslope to the nearest runway. Please let me know if you have any questions!

Best,

**Julian L. Courtade**  
Chief Airport Inspector  
INDOT, Office of Aviation  
IGCN Room N955  
100 North Senate Avenue  
Indianapolis, IN 46204  
**Office:** (317) 232-1477  
**Email:** [jcourtade@indot.in.gov](mailto:jcourtade@indot.in.gov)



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**From:** Stephanie Verhoff <sverhoff@rqaw.com>  
**Sent:** Friday, March 13, 2020 2:08 PM  
**To:** Courtade, Julian <JCourtade@indot.IN.gov>  
**Subject:** Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

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Director,

Attached, please find an early coordination letter and appendices regarding the above referenced project. If you choose, these materials are for your review and comment for the environmental document.

**THIS IS NOT A PERMIT**

**State of Indiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**Division of Fish and Wildlife**  
**Early Coordination/Environmental Assessment**

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**DNR #:** ER-22334

**Request Received:** March 13, 2020

**Requestor:** RQAW Environmental  
Stephanie Verhoff  
9770 North Street, Suite 110  
Fishers, IN 46038

**Project:** US 231 roadway rehabilitation from about 0.03 mile south of SR 240 to Frazier Street, Greencastle; Des #1700121

**County/Site info:** Putnam

The Indiana Department of Natural Resources has reviewed the above referenced project per your request. Our agency offers the following comments for your information and in accordance with the National Environmental Policy Act of 1969.

If our agency has regulatory jurisdiction over the project, the recommendations contained in this letter may become requirements of any permit issued. If we do not have permitting authority, all recommendations are voluntary.

**Regulatory Assessment:** Formal approval by the Department of Natural Resources under the regulatory programs administered by the Division of Water is not required for this project.

**Natural Heritage Database:** The Natural Heritage Program's data have been checked. Greencastle Park Board's Robe Ann Park, a Land & Water Conservation Fund site, is located within 1/2 mile of the project area.

**Fish & Wildlife Comments:** Avoid and minimize impacts to fish, wildlife, and botanical resources to the greatest extent possible, and compensate for impacts. The following are recommendations that address potential impacts identified in the proposed project area:

1) Drainage & Stormwater Management:

Drainage and stormwater management were briefly mentioned in the information submitted. The Division of Fish & Wildlife recommends considering a more sustainable approach to stormwater management if upgrades are required. The traditional model of stormwater management aims to drain urban runoff as quickly as possible with the help of channels and pipes, which increases peak flows and costs of stormwater management. This type of solution only transfers flood problems from one section of the basin to another section. A more sustainable approach aims to rebuild the natural water cycle by using storage techniques (retention basins, constructed wetlands, raingardens, etc.), recharging groundwater using infiltration techniques (infiltration basins or trenches, pervious pavement, etc.), and reusing runoff for irrigation elsewhere in the basin. The following links give a good overview of traditional and sustainable stormwater management systems and their pros and cons for consideration during the design of the proposed project:

<https://www.epa.gov/greeningepa/epa-facility-stormwater-management>;  
<https://www.epa.gov/greeningepa/stormwater-management-practices-epa-facilities>.

2) Urban Tree Habitat:

Tree removal was not mentioned in the information submitted. If tree removal is needed, the Division of Fish & Wildlife recommends avoiding removing urban trees to the greatest extent possible and replacing trees that must be removed. Street trees are important to fish and wildlife resources in urban areas. Indiana's street trees also provide millions of dollars of tangible benefits to Indiana communities by their presence in the urban environment. Their shade and beauty contribute to the quality of life. They

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**State of Indiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**Division of Fish and Wildlife**  
**Early Coordination/Environmental Assessment**

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provide significant increases in real estate values, create attractive settings for commercial businesses, and improve community neighborhood appeal. Trees decrease energy consumption by providing shade and acting as windbreaks. They reduce water treatment costs and impede soil erosion by slowing the runoff of stormwater. Trees also cool the air temperature, cleanse pollutants from the air, and produce oxygen while absorbing carbon dioxide. Trees are an integral component of the urban environment. Proactively managing and maintaining a street tree population will ultimately maximize the benefits afforded by their aesthetic and ecological functions. The following links give a good overview of the benefits of a street tree program and how to select the right species to avoid the negative impacts of non-native invasive species such as the common and popular Bradford pear: <https://www.in.gov/dnr/forestry/3605.htm> > Community & Urban Forestry > Tree Species Lists.

Trees removed in an urban setting should be mitigated by planting five trees, at least 2 inches in diameter-at-breast height (dbh), for each tree which is removed that is 10" dbh or greater (5:1 mitigation based on the number of large trees) or by using the 1:1 replacement ratio based on area depending on the type of habitat impacted (individual canopy tree removal in an urban streetscape or park-like environment versus removal of habitat supporting a tree canopy, woody understory, and herbaceous layer). Impacts under 0.10 acres may still involve the replacement of large diameter trees but typically do not require any additional mitigation or additional plantings beyond seeding and stabilizing disturbed areas. There are exceptions for high quality habitat sites however.

3) LED Lighting:

The need for new lighting was not mentioned in the submitted information, but could potentially be needed in certain areas. Most transportation corridor designers and municipalities are trending toward LED lighting. Certain types of LED lighting can have negative impacts on both human and wildlife health and safety. The Division of Fish and Wildlife strongly encourages visiting the International Dark-Sky Association's website to learn more about the potential negative impacts of improperly selected LED lighting systems, if applicable: <http://darksky.org/lighting/led-practical-guide/>.

The additional measures listed below should be implemented to avoid, minimize, or compensate for impacts to fish, wildlife, and botanical resources:

1. Revegetate all bare and disturbed areas that are not currently mowed and maintained with a mixture of grasses, sedges, and wildflowers native to Central Indiana as soon as possible upon completion; turf-type grasses (including low-endophyte, friendly endophyte, and endophyte free tall fescue but excluding all other varieties of tall fescue) may be used in currently mowed areas only.
2. Minimize and contain within the project limits all tree and brush clearing.
3. Do not cut any trees suitable for Indiana bat or Northern Long-eared bat roosting (greater than 5 inches dbh, living or dead, with loose hanging bark, or with cracks, crevices, or cavities) from April 1 through September 30.
4. Appropriately designed measures for controlling erosion and sediment must be implemented to prevent sediment from entering the stream or leaving the construction site; maintain these measures until construction is complete and all disturbed areas are stabilized.
5. Seed and protect all disturbed streambanks and slopes not protected by other methods that are 3:1 or steeper with erosion control blankets that are heavy-duty, biodegradable, and net free or that use loose-woven / Leno-woven netting to minimize the entrapment and snaring of small-bodied wildlife such as snakes and turtles (follow manufacturer's recommendations for selection and installation); seed and apply mulch on all other disturbed areas.

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**State of Indiana**  
**DEPARTMENT OF NATURAL RESOURCES**  
**Division of Fish and Wildlife**  
Early Coordination/Environmental Assessment

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**Contact Staff:**

Christie L. Stanifer, Environ. Coordinator, Fish & Wildlife  
Our agency appreciates this opportunity to be of service. Please contact the above staff member at (317) 232-4080 if we can be of further assistance.

*Christie L. Stanifer*

---

**Date:** April 9, 2020

Christie L. Stanifer  
Environ. Coordinator  
Division of Fish and Wildlife

## Jaime Byerly

---

**From:** Bronson, Bob <bbronson@dnr.IN.gov>  
**Sent:** Tuesday, September 29, 2020 1:36 PM  
**To:** Stephanie Verhoff  
**Cc:** Jaime Byerly; Herber, Lisa; Joseph Dabkowski  
**Subject:** [EXT] RE: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

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All, There is no LWCF funding in these trail projects. Robe Ann Park has received LWCF in the past and is protected under 6(f)3 but rails only enhance the outdoor recreation utility of the park and would have no negative effect on the park siter.

Sincerely

Bob Bronson  
Grants Section Chief  
Division of Outdoor Recreation  
Department of Natural Resources  
402 W. Washington St. W271  
Indianapolis, IN 46204  
317-232-4075  
[www.dnr.IN.gov](http://www.dnr.IN.gov)

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---

**From:** Stephanie Verhoff [mailto:sverhoff@rqaw.com]  
**Sent:** Tuesday, September 29, 2020 12:11 PM  
**To:** Bronson, Bob <bbronson@dnr.IN.gov>  
**Cc:** Jaime Byerly <jbyerly@RQAW.com>; Herber, Lisa <LHerber1@dnr.IN.gov>; Joseph Dabkowski <jdabkowski@RQAW.com>  
**Subject:** RE: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

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Mr. Bronson,

We are now putting together the environmental document for this project and realized we are not fully able to address one comment received from the National Park Service (see attached for their early coordination response). The NPS specifically asks if the five planned trail segments within the project area and as shown in the attached Red Flag Investigation map, are funded by LWCF monies. These trail segments are proposed and are discussed as planned trails in the Greencastle Parks and Recreation Master Plan (2018-2022). The master plan only mentions established funding for

the Campus Link Trail (southernmost trail) through an INDOT TEA-21 TE grant. No permanent right-of-way will be needed from any of these five proposed trails.

Would the IDNR Division of Outdoor Recreation please respond to the NPS's question so we can incorporate your response in the environmental document?

Thanks (again),

**Stephanie Verhoff**

NEPA Specialist

O: 317.588.1765

[www.rqaw.com](http://www.rqaw.com)

---

**From:** Bronson, Bob <[bbronson@dnr.IN.gov](mailto:bbronson@dnr.IN.gov)>

**Sent:** Tuesday, May 5, 2020 11:17 AM

**To:** Stephanie Verhoff <[sverhoff@rqaw.com](mailto:sverhoff@rqaw.com)>

**Cc:** Jaime Byerly <[jbyerly@RQAW.com](mailto:jbyerly@RQAW.com)>; Herber, Lisa <[LHerber1@dnr.IN.gov](mailto:LHerber1@dnr.IN.gov)>

**Subject:** RE: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

If there is no taking of property and only temporary right of way then there is no issue with 6(f)3 and Robe Ann Park.  
Thanks Bob

---

**From:** Stephanie Verhoff [<mailto:sverhoff@rqaw.com>]

**Sent:** Tuesday, May 05, 2020 11:10 AM

**To:** Bronson, Bob <[bbronson@dnr.IN.gov](mailto:bbronson@dnr.IN.gov)>

**Cc:** Jaime Byerly <[jbyerly@RQAW.com](mailto:jbyerly@RQAW.com)>; Herber, Lisa <[LHerber1@dnr.IN.gov](mailto:LHerber1@dnr.IN.gov)>

**Subject:** RE: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

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Mr. Bronson,

Thank you for the below information. We wanted to clarify what work is being done for this project regarding Robe Ann Park, a recipient of LWCF funding. Currently, the project will require approximately 0.04 acre of permanent right-of-way and 0.09 acre of temporary right-of-way from Robe Ann Park which is owned/managed by the City of Greencastle.

The permanent right-of-way is located at the US 231 entrance to the park and contains two approximately 3-foot wide sidewalks and two curb ramps (one north and south of the entrance drive) and mowed grass. The permanent right-of-way is needed to replace both curb ramps and upgrade them to meet current ADA standards, replace the existing 3-foot wide sidewalk segments in-kind, connect both upgraded curb ramps to the sidewalks, and reconstruct the park access drive (see attached aerials). Currently, plans are still being developed regarding the amount of permanent right-of-way required at the US 231 entrance to the park. In this area, the designer is trying to minimize permanent right-of-way requirements and it is possible it could change to temporary right-of-way.

The temporary right-of-way is along the western park boundary and the east side of US 231 and will be needed for grading purposes to replace approximately 500 linear feet of the existing 3-foot wide sidewalk (see attached aerials). The existing sidewalk will be widened to 4 feet wide and upgraded to meet current ADA standards. The widened sidewalk will be within existing US 231 right-of-way. Up to three trees (one alive silver maple, one damaged elm, and

one dead ash) will need to be removed within the temporary right-of-way. The temporary right-of-way consists of mowed grass and trees (see attached aerials).

After review of this information, would you please comment if the proposed work within Robe Ann Park would result in a Section 6(f) conversion?

We will be communicating with the Greencastle Parks and Recreation Department and People Pathways regarding Section 4(f) resources within the project area.

Thank you in advance and let us know if you need additional information or have any questions,

**Stephanie Verhoff**

NEPA Specialist

O: 317.588.1765

[www.rqaw.com](http://www.rqaw.com)

---

**From:** Bronson, Bob <[bbronson@dnr.IN.gov](mailto:bbronson@dnr.IN.gov)>

**Sent:** Wednesday, April 29, 2020 2:39 PM

**To:** Stephanie Verhoff <[sverhoff@rqaw.com](mailto:sverhoff@rqaw.com)>

**Cc:** Jaime Byerly <[jbyerly@RQAW.com](mailto:jbyerly@RQAW.com)>; Herber, Lisa <[LHerber1@dnr.IN.gov](mailto:LHerber1@dnr.IN.gov)>

**Subject:** FW: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

---

**From:** Bronson, Bob

**Sent:** Wednesday, April 29, 2020 2:36 PM

**To:** 'Stephanie Verhoff' <[sverhoff@rqaw.com](mailto:sverhoff@rqaw.com)>

**Cc:** Jaime Byerly <[jbyerly@RQAW.com](mailto:jbyerly@RQAW.com)>; Herber, Lisa <[LHerber1@dnr.IN.gov](mailto:LHerber1@dnr.IN.gov)>

**Subject:** RE: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

Stephanie, If this project is taking part of Robe Ann Park for road it is more than likely a 4f and 6(f)3 taking. I know that INDOT allows small taking of property. The Land and Water Conservation Fund does not and a small 6(f)3 conversion takes place if you are taking park land. We recommend shifting and not taking property from the park and if not you will need to go through the 6(f)3 conversion process

Bob Bronson

Grants Section Chief

Division of Outdoor Recreation

Department of Natural Resources

402 W. Washington St. W271

Indianapolis, IN 46204

317-232-4075

[www.dnr.IN.gov](http://www.dnr.IN.gov)

*Please let us know about the quality of our service by taking this [brief customer survey](#).*

Sincerely



---

**From:** Stephanie Verhoff [<mailto:sverhoff@rqaw.com>]

**Sent:** Wednesday, April 29, 2020 1:07 PM

**To:** Bronson, Bob <[bbronson@dnr.IN.gov](mailto:bbronson@dnr.IN.gov)>

**Cc:** Jaime Byerly <[jbyerly@RQAW.com](mailto:jbyerly@RQAW.com)>; Herber, Lisa <[LHerber1@dnr.IN.gov](mailto:LHerber1@dnr.IN.gov)>

**Subject:** FW: Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

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Good Afternoon,

I wanted to follow up with you regarding the above referenced project since RQAW has recently received a response from the National Park Service. The response noted that there are five trail segments within the project area in addition to Robe Ann Park. The Indiana Department of Natural Resources was identified as a resource to assist in determining if Federal monies were utilized for these resources. Any guidance you can provide is much appreciated.

Thanks,

**Stephanie Verhoff**

NEPA Specialist

O: 317.588.1765

[www.rqaw.com](http://www.rqaw.com)

---

**From:** Stephanie Verhoff

**Sent:** Friday, March 13, 2020 2:11 PM

**To:** [bbronson@dnr.IN.gov](mailto:bbronson@dnr.IN.gov)

**Subject:** Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

Hello,

Attached, please find an early coordination letter and appendices regarding the above referenced project. If you choose, these materials are for your review and comment for the environmental document.

Thank you,  
Stephanie



**Stephanie Verhoff**

NEPA Specialist

8770 North St., Ste. 110

Fishers, IN 46038

O: 317.588.1765

[www.rqaw.com](http://www.rqaw.com)



*Best Places to Work in Indiana, 2018-2020  
IndyStar's Top Workplaces, 2019*

## Stephanie Verhoff

---

**From:** Johnson, Leigh E <Leigh\_Johnson@nps.gov>  
**Sent:** Tuesday, April 28, 2020 12:03 PM  
**To:** Stephanie Verhoff  
**Cc:** Walls, Steven  
**Subject:** Re: Des. Number 1700121 (Road Rehab Project US 321, from approx 0.03 mile S of SR240 to Frazier St along US 231 Greencastle, Putnum County, Indiana))

Ms. Verhoff,

Thank you for the opportunity to review the project noted in the subject line.

Your "Red Flag Investigation" noted five (5) trail segments within the project area. Please verify these trails were not funded with Federal monies (i.e. Land Water Conservation Fund (LWCF)) or similar grants. If Federal monies were used or plan to be used on these trails or segments of trails, then additional follow up may be necessary. If follow up is necessary, the Indiana Department of Natural Resources would be the best source to assist you, as they serve as the LWCF grant administer for the state.

(<https://www.in.gov/dnr/outdoor/4071.htm>)

It is possible Robe Ann Park had federal dollars used during its development, but the roadwork described is unlikely to have an impact on the park itself. I do not see the need for additional follow up for this park.

Otherwise, I see no NPS related concerns for this project.

Thanks,  
Leigh

----

Leigh Ellen Johnson, AICP  
Community Planner  
National Park Service  
DOI Unified Regions 3, 4, 5  
office: ~~402-661-1740~~ *please use email for now*  
email: leigh\_johnson@nps.gov

The Planning and Compliance Division helps parks identify and address their key needs through project scoping, interdisciplinary plans, and decision documents that guide management actions.



United States Department of Agriculture

March 30, 2020

Stephanie Verhoff  
RQAW Corporation  
8770 North Street, Suite 110  
Fishers, Indiana 46038

Dear Ms. Verhoff:

The proposed project to rehabilitate US 231 from south of State Road 240 to Frazier Street in Greencastle, Putnam County, Indiana (Des No. 1700121), as referred to in your letter received on March 13, 2020, will not cause a conversion of prime farmland.

If you need additional information, please contact John Allen at 317-295-5859.

Sincerely,

RICK NEILSON  
State Soil Scientist

## Stephanie Verhoff

---

**From:** McWilliams, Robin <robin\_mcwilliams@fws.gov>  
**Sent:** Tuesday, July 21, 2020 1:27 PM  
**To:** Stephanie Verhoff  
**Subject:** Re: [EXTERNAL] Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

Dear Stephanie,

This responds to your recent letter requesting our comments on the aforementioned project.

These comments have been prepared under the authority of the Fish and Wildlife Coordination Act (16 U.S.C. 661 et. seq.) and are consistent with the intent of the National Environmental Policy Act of 1969, the Endangered Species Act of 1973, and the U. S. Fish and Wildlife Service's Mitigation Policy.

The project is within the range of the Indiana bat (*Myotis sodalis*) and northern long-eared bat (*Myotis septentrionalis*) and should follow the new Indiana bat/northern long-eared bat programmatic consultation process, if applicable (i.e. a federal transportation nexus is established). The Service has 14 days after a "Not Likely to Adversely Affect" determination letter is generated to review the project and provide additional comments or request additional information; if you do not receive a response from us within 14 days, we have no additional comments.

Based on a review of the information you provided, the U.S. Fish and Wildlife Service has no other comments on the project as currently proposed. However, should new information arise pertaining to project plans or a revised species list be published, it will be necessary for the Federal agency to reinitiate consultation. Standard recommendations are provided below.

We appreciate the opportunity to comment at this early stage of project planning. If you have any questions about our recommendations, please call (812) 334-4261 x. 207.

Sincerely,  
Robin McWilliams Munson

### **Standard Recommendations:**

1. Do not clear trees or understory vegetation outside the construction zone boundaries. **(This restriction is not related to the "tree clearing" restriction for potential Indiana Bat habitat.)**
2. Restrict below low-water work in streams to placement of culverts, piers, pilings and/or footings, shaping of the spill slopes around the bridge abutments, and placement of riprap. Culverts should span the active stream channel, should be either embedded or a 3-sided or open-arch culvert, and be installed where practicable on an essentially flat slope. When an open-bottom culvert or arch is used in a stream, which has a good natural bottom substrate, such as gravel, cobbles and boulders, the existing substrate should be left undisturbed beneath the culvert to provide natural habitat for the aquatic community.
3. Restrict channel work and vegetation clearing to the minimum necessary for installation of the stream crossing structure.

4. Minimize the extent of hard armor (riprap) in bank stabilization by using bioengineering techniques whenever possible. If riprap is utilized for bank stabilization, extend it below low-water elevation to provide aquatic habitat.
5. Implement temporary erosion and sediment control methods within areas of disturbed soil. All disturbed soil areas upon project completion will be vegetated following INDOT's standard specifications.
6. Avoid all work within the inundated part of the stream channel (in perennial streams and larger intermittent streams) during the fish spawning season (April 1 through June 30), except for work within sealed structures such as caissons or cofferdams that were installed prior to the spawning season. No equipment shall be operated below Ordinary High Water Mark during this time unless the machinery is within the caissons or on the cofferdams.
7. Evaluate wildlife crossings under bridge/culverts projects in appropriate situations. Suitable crossings include flat areas below bridge abutments with suitable ground cover, high water shelves in culverts, amphibian tunnels and diversion fencing

Robin McWilliams Munson  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
620 South Walker Street  
Bloomington, IN 46142  
812-334-4261

Mon-Tues 8-3:30p  
Wed-Thurs 8:30-3p Telework

---

**From:** Stephanie Verhoff <sverhoff@rqaw.com>  
**Sent:** Thursday, June 25, 2020 12:05 PM  
**To:** McWilliams, Robin <robin\_mckilliams@fws.gov>  
**Cc:** Aaron Lawson <alawson@rqaw.com>  
**Subject:** [EXTERNAL] Agencies Early Coordination: US 231 Greencastle Road Rehabilitation Project in Putnam County, Indiana (Des 1700121)

Hello Robin,

Attached, please find an early coordination letter and appendices regarding the above referenced project. These materials are for your review and comment for the environmental document. Coordination regarding this project is being initiated due to tree clearing exceeding 0.5 acre, thus the Programmatic Coordination via the Interim Policy does not apply. It is anticipated that tree clearing will not exceed 0.65 acre.

Thank you,  
Stephanie



**Stephanie Verhoff**

NEPA Specialist  
8770 North St., Ste. 110  
Fishers, IN 46038  
O: 317.588.1765  
[www.rqaw.com](http://www.rqaw.com)



*Best Places to Work in Indiana, 2018-2020  
IndyStar's Top Workplaces, 2019*



## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

Indiana Ecological Services Field Office

620 South Walker Street

Bloomington, IN 47403-2121

Phone: (812) 334-4261 Fax: (812) 334-4273

<http://www.fws.gov/midwest/Endangered/section7/s7process/step1.html>



In Reply Refer To:

November 23, 2020

Consultation Code: 03E12000-2020-SLI-2057

Event Code: 03E12000-2021-E-01009

Project Name: US 231 Greencastle Road Rehabilitation Project in Putnam County (DES 1700121)

Subject: Updated list of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The attached species list identifies any federally threatened, endangered, proposed and candidate species that may occur within the boundary of your proposed project or may be affected by your proposed project. The list also includes designated critical habitat if present within your proposed project area or affected by your project. This list is provided to you as the initial step of the consultation process required under section 7(c) of the Endangered Species Act, also referred to as Section 7 Consultation.

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service if they determine their project "may affect" listed species or critical habitat.

Under 50 CFR 402.12(e) (the regulations that implement Section 7 of the Endangered Species Act) the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally. You may verify the list by visiting the ECOS-IPaC website <http://ecos.fws.gov/ipac/> at regular intervals during project planning and implementation and completing the same process you used to receive the attached list. As an alternative, you may contact this Ecological Services Field Office for updates.

Please use the species list provided and visit the U.S. Fish and Wildlife Service's Region 3 Section 7 Technical Assistance website at - <http://www.fws.gov/midwest/endangered/section7/s7process/index.html>. This website contains step-by-step instructions which will help you

determine if your project will have an adverse effect on listed species and will help lead you through the Section 7 process.

For all **wind energy projects** and **projects that include installing towers that use guy wires or are over 200 feet in height**, please contact this field office directly for assistance, even if no federally listed plants, animals or critical habitat are present within your proposed project or may be affected by your proposed project.

Although no longer protected under the Endangered Species Act, be aware that bald eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*) and Migratory Bird Treaty Act (16 U.S.C. 703 *et seq.*), as are golden eagles. Projects affecting these species may require measures to avoid harming eagles or may require a permit. If your project is near an eagle nest or winter roost area, see our Eagle Permits website at <http://www.fws.gov/midwest/midwestbird/EaglePermits/index.html> to help you determine if you can avoid impacting eagles or if a permit may be necessary.

We appreciate your concern for threatened and endangered species. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

## Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Indiana Ecological Services Field Office**

620 South Walker Street

Bloomington, IN 47403-2121

(812) 334-4261



## Project Summary

Consultation Code: 03E12000-2020-SLI-2057

Event Code: 03E12000-2021-E-01009

Project Name: US 231 Greencastle Road Rehabilitation Project in Putnam County (DES 1700121)

Project Type: TRANSPORTATION

Project Description: The project (DES 1700121) is located on US 231 (also identified locally as Bloomington Street, Jackson Street, and Washington Street) and will extend from approximately 0.03 mile south of SR (State Road) 240 northward to Frazier Street, for a total length of approximately 1.64 miles in the City of Greencastle, Putnam County, Indiana.

The proposed project would involve a functional Hot Mix Asphalt (HMA) overlay from the beginning of the project north to Washington Street and pavement replacement from Washington Street north to the at-grade railroad crossing. From the at-grade railroad crossing north to the end of the project, pavement would be milled, patched, and resurfaced. Due to the increase in profile grade within the limits of the functional overlay, curb and gutter replacement would be needed. All existing pedestrian facilities within the project area would be analyzed to determine if they meet current ADA criteria. The existing water main located under US 231 along Jackson and Washington Streets would be replaced. The project will require approximately 0.2 acre of permanent and 1.55 acre of temporary right-of-way for the project.

Suitable summer habitat is located adjacent to the project area. Approximately 0.65 acre of trees are anticipated to be cleared within the project area. The dominant tree species to be removed consist of silver maple (*Acer saccharinum*) and red oak (*Quercus rubra*). Trees will be removed during the inactive season. A review of the USFWS Database by INDOT Crawfordsville District on June 10, 2019 did not indicate the presence of endangered bat species in or within 0.5 mile of the project area. No small structures are anticipated to be impacted. RQAW preformed a site visit on August 10, 2018 and April 22, 2019 to identify any ecological resources present. No bats or evidence of bats were seen or heard during the site visits. Temporary lighting may be utilized during construction. The project will not involve the replacement or installation of permanent lighting. Construction is anticipated to begin in Summer of 2022.

**Project Location:**

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/39.64076874636406N86.85687734458753W>



Counties: Putnam, IN

## Endangered Species Act Species

There is a total of 2 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 1 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

- 
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

## Mammals

NAME	STATUS
Indiana Bat <i>Myotis sodalis</i> There is <b>final</b> critical habitat for this species. Your location is outside the critical habitat. Species profile: <a href="https://ecos.fws.gov/ecp/species/5949">https://ecos.fws.gov/ecp/species/5949</a> Species survey guidelines: <a href="https://ecos.fws.gov/ipac/guideline/survey/population/1/office/31440.pdf">https://ecos.fws.gov/ipac/guideline/survey/population/1/office/31440.pdf</a>	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none"> <li>▪ Incidental take of the NLEB is not prohibited here. Federal agencies may consult using the 4(d) rule streamlined process. Transportation projects may consult using the programmatic process. See <a href="http://www.fws.gov/midwest/endangered/mammals/nleb/index.html">www.fws.gov/midwest/endangered/mammals/nleb/index.html</a></li> </ul> Species profile: <a href="https://ecos.fws.gov/ecp/species/9045">https://ecos.fws.gov/ecp/species/9045</a>	Threatened

## Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

## Stephanie Verhoff

---

**From:** Curry, Jennifer <JCurry1@indot.IN.gov>  
**Sent:** Tuesday, June 30, 2020 8:36 AM  
**To:** Stephanie Verhoff  
**Cc:** Hinkle, Meghan; Khan, Asfahan  
**Subject:** RE: Stephanie Verhoff invited you to join an IPaC project

Thanks Stephanie for the email.

INDOT has reviewed the determination key and has completed the verification process to forward the project to USFWS for review.

Thanks,

Jenni Curry  
Environmental Manager II  
Indiana Department of Transportation  
32 South Broadway  
Greenfield, IN 46140  
317-467-3929

-----Original Message-----

From: Stephanie Verhoff <sverhoff@rqaw.com>  
Sent: Tuesday, June 30, 2020 8:27 AM  
To: Curry, Jennifer <JCurry1@indot.IN.gov>  
Cc: Hinkle, Meghan <MHinkle@indot.IN.gov>; Koehlinger, Aaron <AKoehlinger@indot.IN.gov>  
Subject: RE: Stephanie Verhoff invited you to join an IPaC project

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

Good morning,

I've attached a PDF of the USFWS bat database check email. Let me know if you need anything else!

Thanks,

Stephanie Verhoff  
NEPA Specialist  
O: 317.588.1765  
www.rqaw.com

-----Original Message-----

From: Curry, Jennifer <JCurry1@indot.IN.gov>  
Sent: Tuesday, June 30, 2020 7:34 AM  
To: Stephanie Verhoff <sverhoff@rqaw.com>  
Cc: Hinkle, Meghan <MHinkle@indot.IN.gov>; Koehlinger, Aaron <AKoehlinger@indot.IN.gov>  
Subject: RE: Stephanie Verhoff invited you to join an IPaC project



## United States Department of the Interior



### FISH AND WILDLIFE SERVICE

Indiana Ecological Services Field Office

620 South Walker Street

Bloomington, IN 47403-2121

Phone: (812) 334-4261 Fax: (812) 334-4273

<http://www.fws.gov/midwest/Endangered/section7/s7process/step1.html>

In Reply Refer To:

June 30, 2020

Consultation Code: 03E12000-2020-I-2057

Event Code: 03E12000-2020-E-08287

Project Name: US 231 Greencastle Road Rehabilitation Project in Putnam County (DES 1700121)

Subject: Concurrence verification letter for the 'US 231 Greencastle Road Rehabilitation Project in Putnam County (DES 1700121)' project under the revised February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat.

To whom it may concern:

The U.S. Fish and Wildlife Service (Service) has received your request to verify that the **US 231 Greencastle Road Rehabilitation Project in Putnam County (DES 1700121)** (Proposed Action) may rely on the concurrence provided in the February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat (PBO) to satisfy requirements under Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 *et seq.*).

Based on the information you provided (Project Description shown below), you have determined that the Proposed Action is within the scope and adheres to the criteria of the PBO, including the adoption of applicable avoidance and minimization measures, and may affect, but is not likely to adversely affect (NLAA) the endangered Indiana bat (*Myotis sodalis*) and/or the threatened Northern long-eared bat (*Myotis septentrionalis*).

The Service has 14 calendar days to notify the lead Federal action agency or designated non-federal representative if we determine that the Proposed Action does not meet the criteria for a NLAA determination under the PBO. If we do not notify the lead Federal action agency or designated non-federal representative within that timeframe, you may proceed with the Proposed Action under the terms of the NLAA concurrence provided in the PBO. This verification period allows Service Field Offices to apply local knowledge to implementation of the PBO, as we may identify a small subset of actions having impacts that were unanticipated. In such instances,

Service Field Offices may request additional information that is necessary to verify inclusion of the proposed action under the PBO.

**For Proposed Actions that include bridge/structure removal, replacement, and/or maintenance activities:** If your initial bridge/structure assessments failed to detect Indiana bats, but you later detect bats during construction, please submit the Post Assessment Discovery of Bats at Bridge/Structure Form (User Guide Appendix E) to this Service Office. In these instances, potential incidental take of Indiana bats may be exempted provided that the take is reported to the Service.

If the Proposed Action is modified, or new information reveals that it may affect the Indiana bat and/or Northern long-eared bat in a manner or to an extent not considered in the PBO, further review to conclude the requirements of ESA Section 7(a)(2) may be required. If the Proposed Action may affect any other federally-listed or proposed species, and/or any designated critical habitat, additional consultation between the lead Federal action agency and this Service Office is required. If the proposed action has the potential to take bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act may also be required. In either of these circumstances, please contact this Service Office.

## Project Description

The following project name and description was collected in IPaC as part of the endangered species review process.

### Name

US 231 Greencastle Road Rehabilitation Project in Putnam County (DES 1700121)

### Description

The project (DES 1700121) is located on US 231 (also identified locally as Bloomington Street, Jackson Street, and Washington Street) and will extend from approximately 0.03 mile south of SR (State Road) 240 northward to Frazier Street, for a total length of approximately 1.64 miles in the City of Greencastle, Putnam County, Indiana.

The proposed project would involve a functional Hot Mix Asphalt (HMA) overlay from the beginning of the project north to Washington Street and pavement replacement from Washington Street north to the at-grade railroad crossing. From the at-grade railroad crossing north to the end of the project, pavement would be milled, patched, and resurfaced. Due to the increase in profile grade within the limits of the functional overlay, curb and gutter replacement would be needed. All existing pedestrian facilities within the project area would be analyzed to determine if they meet current ADA criteria. The existing water main located under US 231 along Jackson and Washington Streets would be replaced. The project will require approximately 0.2 acre of permanent and 1.55 acre of temporary right-of-way for the project.

Suitable summer habitat is located adjacent to the project area. Approximately 0.65 acre of trees are anticipated to be cleared within the project area. The dominant tree species to be removed consist of silver maple (*Acer saccharinum*) and red oak (*Quercus rubra*). Trees will be removed during the inactive season. A review of the USFWS Database by INDOT Crawfordsville District on June 10, 2019 did not indicate the presence of endangered bat species in or within 0.5 mile of the project area. No small structures are anticipated to be impacted. RQAW performed a site visit on August 10, 2018 and April 22, 2019 to identify any ecological resources present. No bats or evidence of bats were seen or heard during the site visits. Temporary lighting may be utilized during construction. The project will not involve the replacement or installation of permanent lighting. Construction is anticipated to begin in Summer of 2022.

## Determination Key Result

Based on your answers provided, this project(s) may affect, but is not likely to adversely affect the endangered Indiana bat and/or the threatened Northern long-eared bat, therefore, consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required. However, also based on your answers provided, this project may rely on the concurrence provided in the revised February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat.

## Qualification Interview

1. Is the project within the range of the Indiana bat<sup>[1]</sup>?

[1] See [Indiana bat species profile](#)

**Automatically answered**

Yes

2. Is the project within the range of the Northern long-eared bat<sup>[1]</sup>?

[1] See [Northern long-eared bat species profile](#)

**Automatically answered**

Yes

3. Which Federal Agency is the lead for the action?

A) *Federal Highway Administration (FHWA)*

4. Are *all* project activities limited to non-construction<sup>[1]</sup> activities only? (examples of non-construction activities include: bridge/abandoned structure assessments, surveys, planning and technical studies, property inspections, and property sales)

[1] Construction refers to activities involving ground disturbance, percussive noise, and/or lighting.

No

5. Does the project include *any* activities that are **greater than** 300 feet from existing road/rail surfaces<sup>[1]</sup>?

[1] Road surface is defined as the actively used [e.g. motorized vehicles] driving surface and shoulders [may be pavement, gravel, etc.] and rail surface is defined as the edge of the actively used rail ballast.

No



6. Does the project include *any* activities **within** 0.5 miles of a known Indiana bat and/or NLEB hibernaculum<sup>[1]</sup>?

[1] For the purpose of this consultation, a hibernaculum is a site, most often a cave or mine, where bats hibernate during the winter (see suitable habitat), but could also include bridges and structures if bats are found to be hibernating there during the winter.

*No*

7. Is the project located **within** a karst area?

*Yes*

8. Will the project include *any* type of activity that could impact a **known** hibernaculum<sup>[1]</sup>, or impact a karst feature (e.g., sinkhole, losing stream, or spring) that could result in effects to a **known** hibernaculum?

[1] For the purpose of this consultation, a hibernaculum is a site, most often a cave or mine, where bats hibernate during the winter (see suitable habitat), but could also include bridges and structures if bats are found to be hibernating there during the winter.

*No*

9. Is there *any* suitable<sup>[1]</sup> summer habitat for Indiana Bat or NLEB **within** the project action area<sup>[2]</sup>? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

[2] The action area is defined as all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 CFR Section 402.02). Further clarification is provided by the [national consultation FAQs](#).

*Yes*

10. Will the project remove *any* suitable summer habitat<sup>[1]</sup> and/or remove/trim any existing trees **within** suitable summer habitat?

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

*Yes*

11. Will the project clear more than 20 acres of suitable habitat per 5-mile section of road/rail?

*No*

12. Have presence/probable absence (P/A) summer surveys<sup>[1][2]</sup> been conducted<sup>[3][4]</sup> **within** the suitable habitat located within your project action area?

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

[2] Presence/probable absence summer surveys conducted within the fall swarming/spring emergence home range of a documented Indiana bat hibernaculum (contact local Service Field Office for appropriate distance from hibernacula) that result in a negative finding requires additional consultation with the local Service Field Office to determine if clearing of forested habitat is appropriate and/or if seasonal clearing restrictions are needed to avoid and minimize potential adverse effects on fall swarming and spring emerging Indiana bats.

[3] For projects within the range of either the Indiana bat or NLEB in which suitable habitat is present, and no bat surveys have been conducted, the transportation agency will assume presence of the appropriate species. This assumption of presence should be based upon the presence of suitable habitat and the capability of bats to occupy it because of their mobility.

[4] Negative presence/probable absence survey results obtained using the [summer survey guidance](#) are valid for a minimum of two years from the completion of the survey unless new information (e.g., other nearby surveys) suggest otherwise.

*No*

13. Does the project include activities **within documented Indiana bat habitat**<sup>[1][2]</sup>?

[1] Documented roosting or foraging habitat – for the purposes of this consultation, we are considering documented habitat as that where Indiana bats and/or NLEB have actually been captured and tracked using (1) radio telemetry to roosts; (2) radio telemetry biangulation/triangulation to estimate foraging areas; or (3) foraging areas with repeated use documented using acoustics. Documented roosting habitat is also considered as suitable summer habitat within 0.25 miles of documented roosts.)

[2] For the purposes of this key, we are considering documented corridors as that where Indiana bats and/or NLEB have actually been captured and tracked to using (1) radio telemetry; or (2) treed corridors located directly between documented roosting and foraging habitat.

*No*

14. Will the removal or trimming of habitat or trees occur **within** suitable but **undocumented Indiana bat** roosting/foraging habitat or travel corridors?

*Yes*

15. What time of year will the removal or trimming of habitat or trees **within** suitable but **undocumented Indiana bat** roosting/foraging habitat or travel corridors occur<sup>[1]</sup>?

[1] Coordinate with the local Service Field Office for appropriate dates.

*B) During the inactive season*

16. Does the project include activities **within documented NLEB habitat**<sup>[1][2]</sup>?

[1] Documented roosting or foraging habitat – for the purposes of this consultation, we are considering documented habitat as that where Indiana bats and/or NLEB have actually been captured and tracked using (1) radio telemetry to roosts; (2) radio telemetry biangulation/triangulation to estimate foraging areas; or (3) foraging areas with repeated use documented using acoustics. Documented roosting habitat is also considered as suitable summer habitat within 0.25 miles of documented roosts.)

[2] For the purposes of this key, we are considering documented corridors as that where Indiana bats and/or NLEB have actually been captured and tracked to using (1) radio telemetry; or (2) treed corridors located directly between documented roosting and foraging habitat.

*No*

17. Will the removal or trimming of habitat or trees occur **within** suitable but **undocumented NLEB** roosting/foraging habitat or travel corridors?

*Yes*

18. What time of year will the removal or trimming of habitat or trees **within** suitable but **undocumented NLEB** roosting/foraging habitat or travel corridors occur?

*B) During the inactive season*

19. Will *any* tree trimming or removal occur **within** 100 feet of existing road/rail surfaces?

*Yes*

20. Will *any* tree trimming or removal occur **between** 100-300 feet of existing road/rail surfaces?

*No*

21. Are *all* trees that are being removed clearly demarcated?

*Yes*

22. Will the removal of habitat or the removal/trimming of trees include installing new or replacing existing **permanent** lighting?

*No*

23. Does the project include wetland or stream protection activities associated with compensatory wetland mitigation?  
*No*
24. Does the project include slash pile burning?  
*No*
25. Does the project include *any* bridge removal, replacement, and/or maintenance activities (e.g., any bridge repair, retrofit, maintenance, and/or rehabilitation work)?  
*No*
26. Does the project include the removal, replacement, and/or maintenance of *any* structure other than a bridge? (e.g., rest areas, offices, sheds, outbuildings, barns, parking garages, etc.)  
*No*
27. Will the project involve the use of **temporary** lighting *during* the active season?  
*Yes*
28. Is there *any* suitable habitat **within** 1,000 feet of the location(s) where **temporary** lighting will be used?  
*Yes*
29. Will the project install new or replace existing **permanent** lighting?  
*No*
30. Does the project include percussives or other activities (**not including tree removal/trimming or bridge/structure work**) that will increase noise levels above existing traffic/background levels?  
*No*
31. Are *all* project activities that are **not associated with** habitat removal, tree removal/trimming, bridge and/or structure activities, temporary or permanent lighting, or use of percussives, limited to actions that DO NOT cause any additional stressors to the bat species?

Examples: lining roadways, unlighted signage , rail road crossing signals, signal lighting, and minor road repair such as asphalt fill of potholes, etc.

*Yes*

32. Will the project raise the road profile **above the tree canopy**?

No

33. Are the project activities that are not associated with habitat removal, tree removal/trimming, bridge and/or structure activities, temporary or permanent lighting, or use of percussives consistent with a No Effect determination in this key?

**Automatically answered**

*Yes, other project activities are limited to actions that DO NOT cause any additional stressors to the bat species as described in the BA/BO*

34. Is the habitat removal portion of this project consistent with a Not Likely to Adversely Affect determination in this key?

**Automatically answered**

*Yes, because the tree removal/trimming that occurs outside of the Indiana bat's active season occurs greater than 0.5 miles from the nearest hibernaculum, is less than 100 feet from the existing road/rail surface, includes clear demarcation of the trees that are to be removed, and does not alter documented roosts and/or surrounding summer habitat within 0.25 miles of a documented roost.*

35. Is the habitat removal portion of this project consistent with a Not Likely to Adversely Affect determination in this key?

**Automatically answered**

*Yes, because the tree removal/trimming that occurs outside of the NLEB's active season occurs greater than 0.5 miles from the nearest hibernaculum, is less than 100 feet from the existing road/rail surface, includes clear demarcation of the trees that are to be removed, and does not alter documented roosts and/or surrounding summer habitat within 0.25 miles of a documented roost.*

36. **General AMM 1**

Will the project ensure *all* operators, employees, and contractors working in areas of known or presumed bat habitat are aware of *all* FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable Avoidance and Minimization Measures?

Yes

**37. Hibernacula AMM 1**

Will the project ensure that on-site personnel will use best management practices<sup>[1]</sup>, secondary containment measures, or other standard spill prevention and countermeasures to avoid impacts to possible hibernacula?

[1] Coordinate with the appropriate Service Field Office on recommended best management practices for karst in your state.

Yes

**38. Hibernacula AMM 1**

Will the project ensure that, where practicable, a 300 foot buffer will be employed to separate fueling areas and other major containment risk activities from caves, sinkholes, losing streams, and springs in karst topography?

Yes

**39. Tree Removal AMM 1**

Can *all* phases/aspects of the project (e.g., temporary work areas, alignments) be modified, to the extent practicable, to avoid tree removal<sup>[1]</sup> in excess of what is required to implement the project safely?

Note: Tree Removal AMM 1 is a minimization measure, the full implementation of which may not always be practicable. Projects may still be NLAA as long as Tree Removal AMMs 2, 3, and 4 are implemented and LAA as long as Tree Removal AMMs 3, 5, 6, and 7 are implemented.

[1] The word “trees” as used in the AMMs refers to trees that are suitable habitat for each species within their range. See the USFWS’ current summer survey guidance for our latest definitions of suitable habitat.

Yes

**40. Tree Removal AMM 3**

Can tree removal be limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits)?

Yes

**41. Tree Removal AMM 4**

Can the project avoid cutting down/removal of *all* (1) **documented**<sup>[1]</sup> Indiana bat or NLEB roosts<sup>[2]</sup> (that are still suitable for roosting), (2) trees **within** 0.25 miles of roosts, and (3) documented foraging habitat any time of year?

[1] The word documented means habitat where bats have actually been captured and/or tracked.

[2] Documented roosting or foraging habitat – for the purposes of this consultation, we are considering documented habitat as that where Indiana bats and/or NLEB have actually been captured and tracked using (1) radio telemetry to roosts; (2) radio telemetry triangulation/triangulation to estimate foraging areas; or (3) foraging areas with repeated use documented using acoustics. Documented roosting habitat is also considered as suitable summer habitat within 0.25 miles of documented roosts.)

Yes

**42. Lighting AMM 1**

Will *all* **temporary** lighting be directed away from suitable habitat during the active season?

Yes

## Project Questionnaire

1. Have you made a No Effect determination for *all* other species indicated on the FWS IPaC generated species list?

N/A

2. Have you made a May Affect determination for *any* other species on the FWS IPaC generated species list?

N/A

3. How many acres<sup>[1]</sup> of trees are proposed for removal between 0-100 feet of the existing road/rail surface?

[1] If described as number of trees, multiply by 0.09 to convert to acreage and enter that number.

0.65

## Avoidance And Minimization Measures (AMMs)

This determination key result includes the commitment to implement the following Avoidance and Minimization Measures (AMMs):

**GENERAL AMM 1**

Ensure all operators, employees, and contractors working in areas of known or presumed bat habitat are aware of all FHWA/FRA/FTA (Transportation Agencies) environmental commitments, including all applicable AMMs.

**HIBERNACULA AMM 1**

For projects located within karst areas, on-site personnel will use best management practices, secondary containment measures, or other standard spill prevention and countermeasures to avoid impacts to possible hibernacula. Where practicable, a 300 foot buffer will be employed to separate fueling areas and other major containment risk activities from caves, sinkholes, losing streams, and springs in karst topography.

**LIGHTING AMM 1**

Direct temporary lighting away from suitable habitat during the active season.

**TREE REMOVAL AMM 1**

Modify all phases/aspects of the project (e.g., temporary work areas, alignments) to avoid tree removal.

**TREE REMOVAL AMM 2**

Apply time of year restrictions for tree removal when bats are not likely to be present, or limit tree removal to 10 or fewer trees per project at any time of year within 100 feet of existing road/rail surface and **outside of documented** roosting/foraging habitat or travel corridors; visual emergence survey must be conducted with no bats observed.

**TREE REMOVAL AMM 3**

Ensure tree removal is limited to that specified in project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits).

**TREE REMOVAL AMM 4**

Do not remove **documented** Indiana bat or NLEB roosts that are still suitable for roosting, or trees within 0.25 miles of roosts, or **documented** foraging habitat any time of year.



## **Determination Key Description: FHWA, FRA, FTA Programmatic Consultation For Transportation Projects Affecting NLEB Or Indiana Bat**

This key was last updated in IPaC on December 02, 2019. Keys are subject to periodic revision.

This decision key is intended for projects/activities funded or authorized by the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), and/or Federal Transit Administration (FTA), which may require consultation with the U.S. Fish and Wildlife Service (Service) under Section 7 of the Endangered Species Act (ESA) for the endangered **Indiana bat** (*Myotis sodalis*) and the threatened **Northern long-eared bat** (NLEB) (*Myotis septentrionalis*).

This decision key should only be used to verify project applicability with the Service's [February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects](#). The programmatic biological opinion covers limited transportation activities that may affect either bat species, and addresses situations that are both likely and not likely to adversely affect either bat species. This decision key will assist in identifying the effect of a specific project/activity and applicability of the programmatic consultation. The programmatic biological opinion is not intended to cover all types of transportation actions. Activities outside the scope of the programmatic biological opinion, or that may affect ESA-listed species other than the Indiana bat or NLEB, or any designated critical habitat, may require additional ESA Section 7 consultation.

**Categorical Exclusion**

# **Appendix D**

**Section 106 of the National Historic  
Preservation Act (NHPA)**

# US 231 Road Rehabilitation

Greencastle, Putnam County, Indiana

INDOT Des. No.: 1700121

Indiana DHPA No.: 23587



10/5/2020

## Section 106, 800.11 Documentation

Prepared for:  
The Federal Highway Administration  
and Crawfordsville District, Indiana  
Department of Transportation

Prepared by:

  
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**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  
US 231 Road Rehabilitation Project  
DES. NO.: 1700121  
DHPA NO.: 23587**

**AREA OF POTENTIAL EFFECTS  
(Pursuant to 36 CFR Section 800.4(a)(1))**

The Area of Potential Effects (APE) for this project is an irregular polygon. Most of the APE extends one property from the project area (approximately 110 feet from either side of the roadway). It is wider (approximately 180 feet from the roadway) where additional project impacts may occur and where views to the project are increased by open viewsheds. Please see Appendix A for project area maps.

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

As a result of the identification and evaluation efforts for this project, three properties are identified as listed in, eligible for, or potentially eligible for the National Register of Historic Places (NRHP) within the APE for this undertaking.

**Robe Ann Park (IHSSI # 133-250-69053)**

Robe Ann Park is located northeast of Bloomington Street and Tennessee Street in southeastern Greencastle. Robe Ann Park is eligible for the NRHP under Criterion A because it is associated with community and recreational development in Greencastle. The park is an excellent example of a twentieth-century community park continuously used by Greencastle and Putnam County residents and visitors in a variety of ways since 1928. Additionally, it features Works Progress Administration (W.P.A.) elements.

**Eastern Enlargement Historic District (NR-2230)**

The Eastern Enlargement Historic District is roughly bounded by East Franklin Street to the north, Wood Street to the east, rear parcel lines of properties on the south side of Anderson Street to the south, and College Street to the west. The Eastern Enlargement Historic District was listed on the NRHP in 2011 under Criteria A and C in the areas of community planning and development and architecture.

### **Courthouse Square Historic District (NR-0656)**

The Courthouse Square Historic District is located around the Greencastle Courthouse and roughly bounded by Franklin Street to the north, College Avenue to the east, Walnut Street to the south, and Market Street to the west. The Courthouse Square Historic District was listed on the NRHP in 1984 under Criteria A and C in the areas of community planning and development and architecture.

### **EFFECT FINDING**

Robe Ann Park - No Adverse Effect

Eastern Enlargement Historic District - No Adverse Effect

Courthouse Square Historic District - No Adverse Effect

The Indiana Department of Transportation (INDOT), acting on Federal Highway Administration (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)**

**Robe Ann Park (IHSSI # 133-250-69053)** - This undertaking will temporarily occupy land from the Robe Ann Park, a Section 4(f) historic property. INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect". FHWA believes that the temporary occupancy will not constitute a Section 4(f) use because all of the conditions listed in 23 CFR 774.13(d) are satisfied:

1. Duration must be temporary, i.e., less than the time needed for construction of the project, and there should be no change in ownership of the land;
2. Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
4. The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
5. There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

The fulfillment of conditions 1-4 are detailed in Section 4 of the attached documentation, "Describe the Undertaking's Effects on Historic Properties." With regard to condition 5, FHWA respectfully requests the Indiana State Historic Preservation Officer provide written concurrence that they are in agreement that the above criteria have been met and that the impacts to Robe Ann Park constitute a temporary occupancy.

**Eastern Enlargement Historic District (NR-2230)** - This undertaking will convert property from the Eastern Enlargement 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 Eastern Enlargement Historic District pursuant to SAFETEA-LU, thereby satisfying FHWA's responsibilities under Section 4(f) for this historic property.

**Courthouse Square Historic District (NR-0656)** - This undertaking will temporarily occupy land from the Courthouse Square Historic District, a Section 4(f) historic property. INDOT, acting on FHWA's behalf, has determined the appropriate Section 106 finding is "No Adverse Effect". FHWA believes that the temporary occupancy will not constitute a Section 4(f) use because all of the conditions listed in 23 CFR 774.13(d) are satisfied:

1. Duration must be temporary, i.e., less than the time needed for construction of the project, and there should be no change in ownership of the land;
2. Scope of the work must be minor, i.e., both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
3. There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
4. The land being used must be fully restored, i.e., the property must be returned to a condition which is at least as good as that which existed prior to the project; and
5. There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

The fulfillment of conditions 1-4 are detailed in Section 4 of the attached documentation, "Describe the Undertaking's Effects on Historic Properties." With regard to condition 5, FHWA respectfully requests the Indiana State Historic Preservation Officer provide written concurrence that they are in agreement that the above criteria have been met and that the impacts to the Courthouse Square Historic District constitute a temporary occupancy.

**Susan R. Branigin** Digitally signed by Susan R.  
Branigin for  
Date: 2020.10.23 12:43:46 -04'00'  
for \_\_\_\_\_  
Anuradha V. Kumar, for FHWA  
Manager  
INDOT Cultural Resources

\_\_\_\_\_  
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)  
US 231 Road Rehabilitation Project  
DES. NO.: 1700121  
DHPA NO.: 23587**

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

The Indiana Department of Transportation (INDOT) and the Federal Highway Administration (FHWA) intend to proceed with the US 231 road rehabilitation project in Greencastle, Putnam County, Indiana (Des. No.: 1700121). Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertakings on historic properties. The federal involvement in the project is funding received from the FHWA.

The project is on US 231 (locally known as Bloomington Street, Washington Street, and Jackson Street) and extends from SR 240 (Veterans Memorial Highway) north to approximately 35 feet north of Frazier Street in the City of Greencastle, Putnam County, Indiana. It is within Greencastle Township, Greencastle United States Geological Survey (USGS) Topographic Quadrangle, Sections 16 and 21, Township 14 North, Range 4 West. The setting is overall urban and land use adjacent to the project is commercial and residential. Please see project graphics in Appendices A, B, and F.

The primary need for the project is based on the deteriorated pavement structure and poor stormwater drainage along the project route. Currently, US 231 through Greencastle can be broken into southern and northern halves. The southern half includes the Washington Street/Bloomington Street intersection to the southern project terminus (0.9 mile). The northern half includes the northern project terminus to Washington Street/Bloomington Street intersection (0.9 mile). The pavement in the southern half of the project area (Bloomington Street) is experiencing fatigue-cracking in the wheel path and near the curb line, reflective-cracking from the underlying concrete, and age-hardening of the asphalt surface material. The northern half of the project area (Washington and Jackson streets) is experiencing severe pavement distresses due in part to an antiquated water line utility. Furthermore, the existing stormwater drainage system gets overwhelmed during heavy rain events, resulting in poor drainage with ponding. Thus, the engineering assessment has recorded the overall condition of US 231 in Greencastle as poor. An additional need for the project is that curb ramps do not meet current Americans with Disabilities Act (ADA) compliance standards.

The purpose of the project is to improve existing drainage issues and pavement conditions. An additional purpose is to improve curb ramps for pedestrian accessibility.

The preferred alternative can be divided into approximately three sections; **1.)** SR 240 north to the Washington Street/Bloomington Street intersection; **2.)** the Washington Street/Bloomington Street intersection west and north to approximately 100 feet north of Shadowland Avenue; and **3.)** approximately 100 feet north of Shadowland Avenue to 35 feet north of Frazier Street. The recommended alternative involves minor structural overlay through the first section (SR 240 to the Washington Street/Bloomington Street intersection), full depth pavement replacement through the second section (the Washington Street/Bloomington Street intersection to approximately 100 feet north of Shadowland Avenue), and pavement overlay through the third section (approximately 100 feet north of Shadowland Avenue to 35 feet north of Frazier Street).

**Section 1** includes minor structural overlay: milled to a two (2) inch depth and overlaid with four (4) inches of pavement. This will result in pavement that is two (2) inches above the existing grade. Additional work will include: **1)** Replacing the curb and gutters; **2)** Modifying curb ramps; **3)** Regrading driveway approaches; **4)** Replacing sidewalks that are currently adjacent to the back of the curb, and; **5.)** Removing three (3) trees in Robe Ann Park and trees in the grass buffer (lawn between the back of the curb and sidewalk) along Bloomington Street that would not likely survive curb replacement. The concrete steps leading into Robe Ann Park and the dry-stacked stone retaining wall will be avoided. However, the contemporary concrete landing on top of the steps will be replaced in kind. The stone steps in front of the caretaker's house (405 Bloomington Street) will be reset further back and possibly flipped or patched following sidewalk reconstruction. The concrete steps in the southeast quadrant of the Bloomington Street/Washington Street intersection may be replaced in-kind. The stone sidewalk above the steps will not be impacted.

Additionally, along Bloomington Street, drainage structures will not be impacted except to adjust casting elevations. The stamped concrete at the US 231 and Anderson Street intersection will remain in place. Full-depth pavement replacement will occur adjacent to this intersection to properly tie in pavement elevations.

**Section 2** includes replacing the pavement in full depth. The roadway footprint and elevation grade will be perpetuated for the full depth replacement. Associated work includes the following: **1)** Replacing the curbs and gutters at current locations; **2)** Replacing the storm sewer and installing new inlets; **3)** Modifying all curb ramps that do not meet current ADA standards; **4)** Replacing sidewalks that are currently adjacent to the back of curb; **5)** Replacing and moving the water line to the outside of the roadway and below the grass buffer or the sidewalk (any sidewalk replacement will be minimized and in kind), and; **6)** Replacing trees in the grass buffer and sidewalk tree grates with the same species and variety.

The stone drainage structure that was identified below Washington Street, east of Locust Street is anticipated to be avoided, if possible. Mitigation efforts will commence if the structure is encountered during construction. Please see *Section 6. Summary of Consulting Parties and Public Views* of this document for more information.

Additionally in Section 2, the project will involve the following work around the courthouse square (including crosswalks, sidewalks, and an ADA-compliant route with curb ramps to the courthouse): **1)** Removing the crosswalks in the center of the block (west and south of the Putnam County Courthouse); **2)** Maintaining the concrete wall along the inside edge of Jackson and Washington Streets, near the courthouse. Any work to the concrete wide curb will be minimized and replaced in kind; **3)** Encouraging pedestrians to access the courthouse via the ADA-compliant mid-block crosswalk on Indiana Street by improving the crosswalk across Washington Street at the east side of Indiana Street to current ADA-compliant standards; **4)** Replacing the concrete sidewalks up to the commercial buildings along the west side of Jackson Street and the south side of Washington Street; **5)** Replacing the concrete pavers with matching or similar pavers in the same locations, and; **6)** Replacing the trees within the sidewalk tree gates with the same species and variety. Note that the ornamental lights and other landscape amenities such as benches, planters, and trash receptacles around the courthouse square and along Washington Street are anticipated to be salvaged and reset following construction or provided to the City for relocation. Finally, note that it is anticipated that the overhead sign structures will likely be removed.

**Section 3** includes milling the existing pavement to a depth of 1.5 inches and overlay of 1.5 inches with some patching to occur within the existing pavement limits. The roadway footprint and elevation grade will be perpetuated for the pavement overlay. There are no curbs present within these project limits.



Through-traffic will be maintained with a detour and local traffic will be maintained with phased construction. It is anticipated at this time that northbound traffic will be maintained on the northbound side of US 231 while the southbound side is under construction. Then the northbound traffic will be switched to the southbound side while the northbound side is under construction. Southbound US 231 traffic that does not follow an official detour around the city will likely be encouraged to use an established truck route on South Jackson Street. The overlay construction in Section 3 will occur under flagging operations. Access to residences and businesses along US 231 will be continuously maintained during construction.

Please see Sections 4 and 5 of this document for descriptions of more specific project activities within/adjacent to historic properties. Approximately 0.15 acre of permanent and 0.70 acre of temporary right-of-way is anticipated for this undertaking. Permanent right-of-way is needed for curb ramp modification and reacquiring right-of-way in existing sidewalks and curb ramps. The project is anticipated to be let in 2022.

Per 36 CFR 800.9(a), the Area of Potential Effects (APE) is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The APE is influenced by the scale and nature of an undertaking...” The APE encompasses the entire project site, including all locations where the project may be visible; all locations where ground-disturbing activity may result in changes in traffic patterns, land use, or public access; and all areas where there may be direct or indirect effects due to the ground-disturbing elements of the project. The APE for this project is an irregular polygon. The APE boundaries were established using guidance in the INDOT Cultural Resources Manual. Most of the APE extends one property from the project area (approximately 110 feet from either side of the roadway). It is wider (approximately 180 feet from either side of the roadway) where additional project impacts may occur and where views to the project are increased by open viewsheds. Please see Appendices A and B for additional maps of the APE.

## 2. EFFORTS TO IDENTIFY HISTORIC PROPERTIES

The National Register of Historic Places (NRHP) and the Indiana Register of Historic Sites and Structures (State Register) were checked using the State Historic Architectural and Archaeological Research Database (SHAARD) and the Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBCM). Two resources are listed in the NRHP within the APE: Courthouse Square Historic District (NR-0656) and Eastern Enlargement Historic District (NR-2230). The Indiana Historic Sites and Structures Inventory (IHSSI) *Putnam County Interim Report* (1982) data were examined and identified six previously surveyed properties within the APE. The *Indiana Historic Bridge Inventory Volume 2: Listing of Historic and Non-Historic Bridges* (February 2009) by Mead and Hunt was also reviewed. No bridges eligible for listing in the NRHP were identified within the APE.

Early coordination for this project was initiated on March 4, 2019. The agencies/individuals/Tribes (1-27 listed below) were mailed or sent an email with an early coordination letter inviting them to become Section 106 consulting parties. All consulting parties were invited to view the early coordination letter on IN SCOPE (INDOT’s online portal for public viewing Section 106 documents at <http://erms.indot.in.gov/Section106Documents/>). Also, a hard copy of the early coordination letter was mailed to the Indiana State Historic Preservation Office (SHPO). The organizations identified in bold responded and agreed to be consulting parties. Please see Appendix C for a table of consulting parties and Appendix D for correspondence.

- 1. Chad Slider, for Indiana State Historic Preservation Officer (SHPO)**
2. Emily Royer, Indiana Landmarks, Western Regional Office
- 3. Lisa Mock, Putnam County Museum Executive Director**
- 4. Heritage Preservation Society of Putnam County**
5. Larry Tippin, Putnam County Historian
6. Marilyn Clearwaters, Putnam County Historical Society

7. Lorie L. Hallet, Putnam County Auditor
8. Rick Woodall, Putnam County Commissioner (President)
9. David Berry, Putnam County Commissioner
10. Donald Walton, Putnam County Commissioner
11. Michael Ricketts, Putnam County Highway Supervisor
- 12. William A. Dory, Greencastle Mayor**
- 13. Mike Richmond, Main Street Greencastle, Inc.**
14. Brad Phillips, Greencastle Superintendent, Dept. of Public Works
15. Adam Cohen, Common Council (City Council)
16. Stacie Langdon, Common Council (City Council)
17. Steve Fields, Common Council (City Council)
18. Tyler Wade, Common Council (City Council)
19. Mark N. Hammer, Common Council (City Council)
20. Gary Lemon, Common Council (City Council)
21. Dave Murray, Common Council (City Council)
22. Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.
23. Eastern Shawnee Tribe of Oklahoma
- 24. Forest County Potawatomi Community**
- 25. Miami Tribe of Oklahoma**
26. Peoria Tribe of Indians of Oklahoma
27. Pokagon Band of Potawatomi Indians
28. Greencastle School Corporation (see \* below)
29. Depauw University (see \* below)
30. Greencastle Parks & Recreation Department (see \*\* below)

In an email dated March 4, 2019, Greencastle's Mayor Bill Dory agreed to be a consulting party. Mayor Dory noted the two NRHP districts within the project area: the Eastern Enlargement Historic District and the Courthouse Square Historic District. He stated that "A simple resurfacing project should not have an adverse impact on any historic resources as US 231 has been resurfaced several times over the years." Mayor Dory additionally noted that the new sidewalks installed between Bloomington Street and Vine Street were part of a Stellar Communities project.

Additional consulting party responses were received but did not provide content regarding historic properties. In an email dated March 8, 2019, Mike Richmond, Executive Director of Main Street Greencastle Inc., responded to the early coordination letter and requested that he be the contact person for Main Street Greencastle.

In an email dated March 12, 2019, the contact person for the Heritage Preservation Society of Putnam County sent the early coordination letter to the current President and Secretary. The Society's contact information was updated so that they could receive subsequent Section 106 correspondence.

In a letter dated March 19, 2019, Diane Hunter on behalf of the Miami Tribe of Oklahoma accepted the consulting party invitation.

In an email dated May 22, 2020, Michael LaRonge on behalf of the Forest County Potawatomi Community, accepted the consulting party invitation. Both Tribal Historic Preservation Officers expressed that the project would not likely affect historic resources.

\*In a letter dated April 4, 2019, the Indiana SHPO staff recommended inviting Greencastle Community School Corporation and DePauw University to be consulting parties, because of the potential for disruption of traffic to and from their facilities. Per the Indiana SHPO staff recommendation, the Greencastle Community School Corporation, and DePauw University were emailed the coordination letter and the Historic Property Report (HPR) on July 16, 2019. No response was received from either party. The Indiana

SHPO also commented “when a proposed area of potential effects (“APE”) is being developed, it would be advisable to consider whether either the official detour or unofficial detours would likely send greatly increased traffic into areas where there might be historic buildings or districts and whether the APE boundaries should be adjusted to take the effects of that increased traffic into account.” Please see additional correspondence regarding the APE below and in Section 6, *Summary of Consulting Parties and Public Views* later in this document.

No other correspondence was received in response to the ECL. Please see all correspondence in Appendix D.

An HPR (Boot, July 16, 2019) was completed for this project. Please see Appendix E for an excerpt from the HPR. On April 19, 2019, the Qualified Professional (QP) staff at RQAW Corporation performed a site inspection of the APE. The QP architectural historians walked through the project area within the APE and photographed all resources that will be 50 years of age or older at the anticipated letting date (2022). As a result of this field survey and associated documentary research, RQAW’s historian recommended one property as eligible for listing in the NRHP: Robe Ann Park/D.A.R. Log Cabin (IHSSI # 133-250-69053). On July 16, 2019, a hard copy of a coordination letter and HPR were mailed to the Indiana SHPO while other consulting parties were informed via email that the coordination letter and HPR could be viewed electronically by accessing IN SCOPE.

\*\*INDOT’s Section 106 guidance recommends that owners of recommended historic resources be invited to become consulting parties. Therefore, the owner of Robe Ann Park (Greencastle Parks & Recreation Department) was emailed the coordination letter and the HPR on July 16, 2019. The park superintendent was asked to review the early coordination letter on IN SCOPE and invited to become a consulting party. No response was received from the Greencastle Parks & Recreation Department.

In a letter dated August 14, 2019, the Indiana SHPO staff concurred with the historic property recommendations in the HPR. The staff stated, “We agree with the HPR, that the NRHP-listed Courthouse Square Historic District [(NR-0656)] and Eastern Enlargement Historic District [(NR-2230)] retain sufficient integrity to remain eligible for listing... We also agree with the HPR, for the purposes of the Section 106 review of this project, that Robe Ann Park [(IHSSI No. 133-250-69053)] is eligible for the NRHP under Criterion A.”

In the same letter dated August 14, 2019, the Indiana SHPO staff concurred that the APE described in the HPR “appears to be of adequate size to encompass the geographic area in which foreseeable effects of this project on historic properties could occur, based on where excavation and construction activities have been described generally to occur.” The Indiana SHPO staff continued with a restatement of the April 4, 2019, suggestion to consider establishing an APE for detoured traffic. In response, please note that maintenance of traffic was subsequently discussed during the Section 106 process, particularly during the consulting party meeting which took place on May 11, 2020. Please see *Section 6. Summary of Consulting Parties and Public Views* in this document for more information regarding the consulting party meeting and please see Appendix D for all correspondence.

An archaeology report (Phase Ia Archaeology Reconnaissance) was completed by Cultural Resource Analysts, Inc. (CRA) on June 21, 2019 (Curran, June 21, 2019). The tribes listed above were invited to review the report via IN SCOPE while a hard copy was sent to the Indiana SHPO on July 16, 2019. Please see Appendix E for an excerpt from the archaeology report. The archaeological reconnaissance located no archaeological sites within the project area, and it is recommended that the project be allowed to proceed as planned.

In a letter dated August 14, 2019, the Indiana SHPO staff concurred with the archaeology report stating “we have not identified any currently known archaeological resources listed in or eligible for inclusion in the

National Register of Historic Places (“NRHP”) within the proposed project area... It is our opinion that no further archaeological investigations appear necessary at this proposed project area.”

A letter sent on April 23, 2020, invited all consulting parties (including those that previously did not respond) to comment in response to an increase in the project area beyond the previously established APE. This letter also noted a stone drainage structure within the Eastern Enlargement Historic District (below Washington Street, east of Locust Street) that was discovered after the HPR.

On April 30, 2020, a response was received from Indiana Landmarks stating their belief that no historic properties would be negatively affected by the proposal, and that they no longer needed to serve as a consulting party.

On May 11, 2020, a virtual Consulting Party Meeting was held via Microsoft Teams in accordance with public health requirements per the Covid-19 pandemic. During the Consulting Party Meeting, Mr. John Carr of the Indiana Division of Historic Preservation and Archaeology commented on stone drainage structures in Madison and Aurora, Indiana, that are resources considered contributing to historic districts. INDOT suggested that since the subject stone drainage structure is not visible from street-level, it is comparable to brick pavers or cisterns below modern road pavement in terms of Section 106 evaluations and analysis.

In an email and letter sent on May 20, 2020, additional research regarding the stone drainage structure was shared along with meeting minutes from the virtual Consulting Party Meeting that was held on May 11, 2020.

In a letter dated May 26, 2020, the Indiana SHPO staff stated, “it strikes us as unusual, and its construction and materials (stone blocks and slabs) strongly suggest that it dates from the middle or late 19<sup>th</sup> century, within the period of significance of the Eastern Enlargement Historic District (1840-1961).” The Indiana SHPO staff continued, “We, however, think the stone drainage structure is more like a cistern or a coal cellar – an in-ground structure meant to serve over, above-ground properties but never intended to be easily seen. It is part of the built environment of the Eastern Enlargement Historic District... Whether the stone drainage structure is long enough and has sufficient integrity either to be individually eligible for the NHRP or to contribute to the significance of the district (even though not mentioned in the nomination) cannot be determined from the information currently available, but our lack of knowledge does not mean the structure is necessarily insignificant. The structure is unusual enough that something might be learned from it about the construction of that early type of infrastructure in Indiana that is not already widely known or documented.” Please see additional details regarding potential impacts and treatments of the stone drainage structure in Section 6, *Summary of Consulting Parties and Public Views* later in this document.

No other consulting parties provided comments/questions concerning the identification of historical properties. Please see all correspondence in Appendix D.

### 3. DESCRIBE AFFECTED HISTORIC PROPERTIES

#### A. Courthouse Square Historic District (NR-0656)

The Courthouse Square Historic District was listed in the NRHP in 1984 for significance under Criteria A and C in the areas of community planning and development and architecture. The Courthouse Square Historic District is located around the Putnam County Courthouse roughly bounded by Franklin Street to the north, College Avenue to the east, Walnut Street to the south, and Market Street to the west. The district is generally composed of two- and three-story brick and limestone commercial buildings constructed between c. 1870 and 1939, and featuring the following architectural styles: Italianate, Nineteenth-Century Functional, Victorian Renaissance, Queen Anne, Neo-classical, Art Modern, and Federal. Although demolitions and other changes to the district, such as streetscape improvements to Washington, Vine, and Indiana streets, have occurred since its NRHP listing, the characteristics of the district that make it eligible as a whole have not diminished.

#### B. Eastern Enlargement Historic District (NR-2230)

The Eastern Enlargement Historic District was listed in the NRHP in 2011 for significance under Criteria A and C in the areas of community planning and development and architecture. The Eastern Enlargement Historic District is roughly bounded by East Franklin Street to the north, Wood Street to the east, rear parcel lines of properties on the south side of Anderson Street to the south, and College Street to the west. The district is generally composed of residential buildings constructed between c. 1840 and the 1950s, and includes architectural styles that demonstrate change over time, such as Civil War-era Greek Revival, Victorian mainstays such as Queen Anne and Italianate, the more middle-class vernacular type of homes of the turn-of-the-century, simple bungalows from the 1920s and 1930s, and Minimal Traditional and Ranch-style homes from the late 1940s and 1950s. The architectural integrity of the residences is very high; other than a few buildings that have been demolished since the listing, much of the building integrity is intact. The Eastern Enlargement Historic District retains the characteristics that made it eligible for listing in the NRHP.

#### C. Robe Ann Park (IHSSI # 133-250-69053)

For the Section 106 purposes of this project, Robe Ann Park is recommended eligible for the NRHP under Criterion A because it is associated with community and recreational development in Greencastle. The park is an excellent example of a twentieth-century community park continuously used by Greencastle and Putnam County residents and visitors in a variety of ways since 1928. Additionally, it features Works Progress Administration (W.P.A.) elements. The park is located south of the Eastern Enlargement Historic District and east of Bloomington Street in southeastern Greencastle, Indiana.

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

The three above-mentioned properties listed or eligible for listing in the NRHP within the APE are located along US 231. The project is anticipated to generally include the following within and adjacent to the historic properties:

- pavement replacement and overlay on the current alignment and maintaining the current footprint with curb line along US 231. The pavement may be replaced at full-depth or milled and overlaid, depending on existing conditions or associated excavation needs;
- curb and gutter replacement at current locations;

- curb ramp modification to meet current ADA standards;
- in-kind sidewalk replacement may occur in some locations, and;
- driveway approach reconstruction.

Please see Appendix F for relevant sheets from the current plan set with the NRHP-eligible resources highlighted.

**A. Robe Ann Park (IHSSI # 133-250-69053)**

Project impacts along the west boundary of Robe Ann Park will be limited to the existing and approximately 0.10 acre of temporary right-of-way for sidewalk reconstruction and curb ramp modification. No permanent right-of-way is anticipated from Robe Ann Park. The project proposes to mill two (2)-inches in depth and overlay with four (4) inches of pavement, replace the curb and gutters, modify curb ramps at the park entrance, reconstruct and widen the narrow and deteriorated sidewalks to 4-feet wide, and remove three trees: a mature elm in poor condition, a small diseased ash, 75% of which is currently estimated to be dead, and a mature silver maple in good condition, in the park along US 231. Additionally, the stone steps in front of the Caretaker's house will be salvaged and reused. The concrete steps leading into the park, and the dry-stacked stone retaining wall will be avoided.

**B. Eastern Enlargement Historic District (NR-2230)**

Project impacts within the historic resource boundary of the Eastern Enlargement Historic District will be primarily limited to the existing right-of-way. Approximately 0.07 acre of temporary and 0.01 acre of permanent right-of-way are anticipated from the Eastern Enlargement Historic District for curb ramp modification and driveway approach reconstruction. Along Bloomington Street, the project proposes to mill the pavement two (2)-inches in depth and overlay with four (4) inches of pavement, reconstruct drive approaches, replace the curb, modify curb ramps, and remove approximately six (6) trees in the grass buffer along Bloomington Street that would not likely survive curb replacement. Note that the stamped concrete at the Anderson Street intersection will be avoided. Additionally, along Bloomington Street, drainage structures will not be impacted except to adjust casting elevations. The concrete steps in the southeast quadrant of the Bloomington Street/Washington Street intersection may be replaced in-kind. The stone sidewalk above the steps will not be impacted.

Along Washington Street, the project proposes to replace the pavement in full depth, reconstruct drive approaches, replace the curb and gutters at current locations, replace the storm sewer and install new inlets, modify curb ramps that do not meet current ADA standards, and move the water line out of the roadway to below the sidewalk or grass buffer. In addition, project activities will include sidewalk and tree replacement in kind as needed to move the water line out of the roadway (location to be determined).

The stone drainage structure that was identified below Washington Street, east of Locust Street, is anticipated to be avoided, if possible. Mitigation efforts will commence if the structure is encountered during construction. Please see Section 6. *Summary of Consulting Parties and Public Views* of this document for more information.

**C. Courthouse Square Historic District (NR-0656)**

Project impacts within the historic resource boundary of the Courthouse Square Historic District will be primarily limited to the existing right-of-way. Approximately 0.20 acre of temporary right-of-way is anticipated from the Courthouse Square Historic District for curb and gutter replacement and

curb ramp modification. The project proposes to replace the pavement in full depth, replace the curb and gutters at current locations, replace the storm sewer and install new inlets, replace drive entrances, modify curb ramps that do not meet current ADA standards, and replace trees within the sidewalk tree grates with the same species and variety. The project also proposes to move the water line out of the roadway to below the sidewalk or grass buffer (location to be determined). Any sidewalk or tree replacement needed to move the water line out of the roadway will be completed in kind.

In addition, around the courthouse square, the project proposes to maintain the short retaining wall around the courthouse while replacing the curb and gutter, removing the crosswalks in the center blocks of Jackson Street and Washington Street, and replacing concrete pavers with matching or similar pavers in the same locations. Please note that pedestrians will be encouraged to access the courthouse via the ADA-compliant mid-block crosswalk on Indiana Street. This will be supported by curb ramp and crosswalk improvements on Washington Street at the east side of Indiana Street to current ADA-compliant standards. Finally, note that the ornamental lights and other landscape amenities such as benches, planters, and trash receptacles around the courthouse square and along Washington Street are anticipated to be salvaged and reset following construction or provided to the City for relocation.

## **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.”

### **A. Robe Ann Park (IHSSI # 133-250-69053)**

According to 36 CFR 800.5(a)(1) the criteria of adverse effect do not apply.

Per 36 CFR 800.5(a)(2)(i), there will not be physical damage to the portion of the property that contributes to its historic integrity. Physical impacts will be limited to the transportation features (roadway and sidewalk) along the historic property boundary’s west edge and removing three trees within Robe Ann Park. The three trees include: a mature elm in poor condition, a small diseased ash, 75% of which is currently estimated to be dead, and a mature silver maple in good condition. Their removal will not diminish the integrity of the park as it will maintain a good tree canopy. Furthermore, the replacement of concrete pavement and curbs, and modification of curb ramps will not alter the characteristics of the property that qualify it for inclusion in the NRHP in a manner that diminishes the property’s integrity. The contributing features such as stone walls, stone columns, and steps will not be impacted.

Per 36 CFR 800.5(a)(2)(ii): 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” will not occur. The only alterations to the property will include replacing concrete curbs and sidewalks, modifying curb ramps, and removing three trees along the western edge. The project will have not negatively impact Robe Ann Park’s historic integrity.

Per 36 CFR 800.5(a)(2)(iii), the “Removal of the property from its historic location” will not occur. The project will not remove any portion of Robe Ann Park from its historic location.

Per 36 CFR 800.5(a)(2)(iv), due to the roadway and curb reconstruction, curb ramp modification, tree removal, and sidewalk reconstruction, a change of the character of the property's use or of physical features within the property's setting may occur; however, the changes will not alter the property's setting in a way that diminishes the historic features that contribute to its historic significance. Robe Ann Park is significant under Criterion A for its association with community and recreational development in Greencastle. Alterations to the property's setting along the park's west edge will be minor with a perpetuated road footprint. Overall, the minor alterations as part of the US 231 undertaking will not have a significant negative impact on the property's historic park setting and will not affect the property's ability to convey its historic significance. Thus, the impacts do not rise to the level of being adverse.

Per 36 CFR 800.5(a)(2)(v), the "Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" will not occur. The roadway width will be perpetuated; therefore, there will be no introduction of visual elements and the undertaking will not provide increased capacity for vehicular noise. Thus, the alterations will not diminish the integrity of the property's significant historic features. The marginal visual setting, atmospheric, and audible changes will not rise to the level of being an adverse effect because they will not diminish the resource's integrity or its ability to portray historic significance.

Per 36 CFR 800.5(a)(2)(vi), the "Neglect of a property which causes its deterioration..." will not occur as a result of the project. The undertaking will not cause the deterioration of any aspect of the Robe Ann Park.

Per 36 CFR 800.5(a)(2)(vii), the "Transfer, lease, or sale of property out of federal ownership or control..." will not occur. Ownership of the resource will not change as a result of this project.

## **B. Eastern Enlargement Historic District (NR-2230)**

According to 36 CFR 800.5(a)(1) the criteria of adverse effect do not apply.

Per 36 CFR 800.5(a)(2)(i), there will not be physical damage to part of the property that contributes to its historic integrity. Physical impacts will be limited to the US 231 corridor (roadway, driveway approaches, curbs, curb ramps, and some trees). The buildings will not be altered. The replacement of pavement and curbs, modification of curb ramps, and sidewalk transitions in kind will not alter the characteristics of the property that qualify it for inclusion in the NRHP in a manner that diminishes the property's integrity. The contributing historic landscape features such as stone walls and stone sidewalk will not be impacted.

Per 36 CFR 800.5(a)(2)(ii): 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" will not occur. The only alterations to the property will occur to some trees and the transportation facilities (roadway, driveway approaches, curbs, curb ramps, and some sidewalk transitions, which will be replaced in-kind). The project will have no direct impact on the historic features of the Eastern Enlargement Historic District.

Per 36 CFR 800.5(a)(2)(iii), the "Removal of the property from its historic location" will not occur. The project will not remove any portion of the Eastern Enlargement Historic District from its historic location.

Per 36 CFR 800.5(a)(2)(iv), due to the roadway and curb reconstruction, driveway approach reconstruction, curb ramp modification, and sidewalk transition reconstruction, a change of the character of the property's use or of physical features within the property's setting may occur;



however, the changes will not alter the property's setting in a way that diminishes the historic features that contribute to its historic significance. The Eastern Enlargement Historic District is significant under Criterion A for its importance in the areas of community planning and development, and under Criterion C for its architecture. The property's setting in this area along US 231 will remain the same with a perpetuated road footprint. Overall, the minor alterations as part of the US 231 undertaking will not have a significant negative impact on the Eastern Enlargement Historic District's setting and will not affect the property's ability to convey its historic significance. Thus, the impacts do not rise to the level of being adverse.

Per 36 CFR 800.5(a)(2)(v), the "Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" will not occur. The roadway and sidewalk widths will be perpetuated; therefore, there will be no introduction of visual elements and the undertaking will not provide increased capacity for vehicular noise. Thus, the alterations will not diminish the integrity of the property's significant historic features. The marginal visual setting, atmospheric, and audible changes will not rise to the level of being an adverse effect because they will not diminish the resource's integrity or its ability to portray historic significance.

Per 36 CFR 800.5(a)(2)(vi), the "Neglect of a property which causes its deterioration..." will not occur as a result of the project. The undertaking will not cause the deterioration of any aspect of the Eastern Enlargement Historic District.

Per 36 CFR 800.5(a)(2)(vii), the "Transfer, lease, or sale of property out of federal ownership or control..." will not occur. Ownership of the resource will not change as a result of this project.

### **C. Courthouse Square Historic District (NR-0656)**

According to 36 CFR 800.5(a)(1) the criteria of adverse effect do not apply.

Per 36 CFR 800.5(a)(2)(i), there will not be physical damage to part of the property that contributes to its historic integrity. Physical impacts will be limited to the transportation facilities (roadway, driveway approaches, curb ramps, crosswalks and sidewalks) between the contributing buildings. The buildings will not be altered. Replacing the pavement, curbs, drainage inlets, sidewalk transitions, and trees, and modifying curb ramps, and removing mid-block crosswalks will not alter the characteristics of the property that qualify it for inclusion in the NRHP in a manner that diminishes the property's integrity.

Per 36 CFR 800.5(a)(2)(ii): 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" will not occur. The only minor alterations to the property will occur to the roadway, driveway approaches, curbs, curb ramps, trees, and sidewalks which will be replaced in kind. The project will have no direct impact on the Courthouse Square Historic District or any historic features on the property.

Per 36 CFR 800.5(a)(2)(iii), the "Removal of the property from its historic location" will not occur. The project will not remove any portion of the Courthouse Square Historic District from its historic location.

Per 36 CFR 800.5(a)(2)(iv), due to the roadway and curb reconstruction, driveway approach replacement, curb ramp modification, tree replacement, sidewalk reconstruction, and potential removal of overhead signs, a change of the character of the property's use or of physical features within the property's setting will occur; however, the changes will not alter the property's setting in a way that diminishes the historic features that contribute to its historic significance. The

Courthouse Square Historic District is significant under Criterion A for its importance to community planning and development, and under Criterion C for its architecture. The property's setting in this area along US 231 will remain largely the same with the removal of the crosswalk in the center of the block west and south of the courthouse, and modified curb ramps. Overall, the minor alterations as part of the US 231 undertaking will not have a significant negative impact on the Courthouse Square Historic District's setting and will not affect the property's ability to convey historic significance. Thus, the impacts do not rise to the level of being adverse.

Per 36 CFR 800.5(a)(2)(v), the "Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features" will not occur. The roadway and sidewalk widths will be perpetuated, and trees replaced; therefore, there will be no introduction of visual elements and the undertaking will not provide increased capacity for vehicular noise. Thus, the alterations will not diminish the integrity of the property's significant historic features. The marginal visual setting, atmospheric, and audible changes will not rise to the level of being an adverse effect because they will not diminish the resource's integrity or ability to portray historic significance.

Per 36 CFR 800.5(a)(2)(vi), the "Neglect of a property which causes its deterioration..." will not occur as a result of the project. The undertaking will not cause the deterioration of any aspect of the Courthouse Square Historic District.

Per 36 CFR 800.5(a)(2)(vii), the "Transfer, lease, or sale of property out of federal ownership or control..." will not occur. Ownership of the resource will not change as a result of this project.

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

In response to the Indiana SHPO staff letters, dated April 4, 2019, and August 14, 2019, requesting "feedback on whether consideration of effects of likely detours has been taken into account," the maintenance of traffic and local detours were discussed in the consulting party letter distributed on April 23, 2020. Also, unofficial local detours were also discussed in the consulting party meeting on May 11, 2020. Through-traffic will be maintained with a detour and local traffic will be maintained with phased construction. It is anticipated at this time that northbound traffic will be maintained on the northbound side of US 231 while the southbound side is under construction. Then the northbound traffic will be switched to the southbound side while the northbound side is under construction. Southbound US 231 traffic that does not follow an official detour around the city will likely be encouraged to use an established truck route on South Jackson Street. Please see the consulting party meeting minutes in Appendix D and the correspondence described below.

In response to the Indiana SHPO staff letter, dated August 14, 2019, requesting additional information "in order to assess the project's effects" a consulting party letter was completed by the Qualified Professional (QP) staff at RQAW Corporation. On April 23, 2020, a hard copy of the consulting party letter was mailed to the Indiana SHPO while other consulting parties were informed via email that the letter could be viewed electronically by accessing IN SCOPE. This letter notified all potential consulting parties again to communicate a potential change in project scope and altered project limits, which extended beyond the previously-established APE; specifically an increase to the northern project limits. The letter communicated the potential minor changes in the scope of work (such as replacing all sidewalks along Bloomington Street, thus removing/replacing trees in the grass buffer (lawn between the back of curb and sidewalk)) and the identification of a stone drainage structure within the APE. Finally, the letter invited the consulting parties (including representatives from FHWA and INDOT) to attend a consulting party meeting on Monday, May 11, 2020, to discuss the project in more detail, particularly regarding the potential to impact historic resources. Please see Appendix D for the consulting party letter.

In an email dated May 1, 2020, on behalf of Indiana Landmarks, Emily Eckardt responded to the April 23, 2020 letter “I do not believe the historic properties in the APE will be negatively affected by the proposal” and “Indiana Landmarks does not need to serve as a consulting party.” RQAW responded in an email dated May 1, 2020, acknowledging the comment that Indiana Landmarks believes that historic properties will not be negatively affected and Indiana Landmarks “will not receive subsequent correspondence unless the project changes.”

Prior to the consulting party meeting, an email invitation, dated May 4, 2020, was sent to consulting parties (including representatives from FHWA and INDOT) notifying them the meeting will be held virtually through Microsoft Teams Meetings instead of in person at the Greencastle City Hall due to the Coronavirus Disease (COVID-19) health concerns. The invitation included the link to participate in the meeting online with video and/or phone. In a subsequent email, dated May 8, 2020, the agenda and Preliminary Field Check (PFC) plans were sent for review by consulting parties ahead of the meeting. Please see Appendix D for a copy of the invitation, agenda, and Preliminary Field Check (PFC) plans.

The consulting party meeting was held virtually on May 11, 2020, at 1:30 PM (EST) using Microsoft Teams. The meeting included representatives from FHWA, INDOT, RQAW, and the following consulting parties: Mayor Bill Dory, City of Greencastle; Michael Ricketts, Putnam County Highway; Susan Gick, Heritage Preservation Society of Putnam County; Mike Richmond, Greencastle Street, Inc.; and Beth McCord and John Carr, Department of Natural Resources, Division of Historic Preservation and Archeology (DNR-DHPA), representing the Indiana Historic Preservation Officer (SHPO).

The discussion during the meeting involved the project’s purpose and need, existing conditions, preliminary alternative, maintenance of traffic, previous Section 106 process, identified historic resources within the APE, and potential effects. Some of the meeting highlights are discussed below. The consulting party meeting minutes were uploaded to IN SCOPE and emailed to the consulting parties for review and comment on May 20, 2020.

Questions raised during the meeting include the following:

- Mr. Carr, representing the Indiana Historic Preservation Officer (SHPO), inquired about expanding the APE to incorporate potential impacts to historic resources due to an increase in traffic, particularly truck traffic, utilizing unofficial local detours. RQAW explained that unofficial local detours cannot be determined, but the official state detour for all through traffic will utilize SR 240 and SR 71 north to US 36. Mayor Dory followed up by stating that the local ordinance established Jackson Street (east of the historic resources and through DePauw University Campus) as a truck route and should handle the southbound traffic as well as the bulk of the local truck traffic.
- Regarding Robe Ann Park, Mayor Dory stated the existing sidewalk west of the park is very narrow and should be widened for pedestrian access. INDOT-CRO commented no retaining wall would be necessary for the wider sidewalk, all grading activities required for a wider sidewalk would be within temporary right-of-way, and the work would not impact the stone retaining walls or other WPA features. In addition, SHPO and RQAW discussed resetting the stone steps in front of the caretaker’s house further back and possible flipping or patching. The tree removal was also discussed. Consulting parties agreed that the park has a good tree canopy, especially in the west half near the project area; therefore, removing a few trees would not likely diminish the integrity of the park. The curb ramps were also discussed and RQAW confirmed that no permanent right-of-way would be needed, only temporary right-of-way will be used and the stone columns at the park entrance would also be avoided. During the discussion of the undertaking’s potential impacts to Robe Ann Park, a consensus emerged among consulting parties that the proposed project would not have an “adverse effect” on Robe Ann Park.

- Regarding the Eastern Enlargement Historic District, RQAW discussed the potential tree removal involved with curb ramp modification and sidewalk replacement, identifying that most of the street trees along Bloomington Street are smaller ornamental varieties likely planted after the period of significance, along with a few mature maple and sycamore trees. RQAW went on to explain that the district is fairly covered with a tree canopy, so the removal of some trees along Washington Street would not significantly impact the district's integrity. INDOT-CRO continued that no sidewalk replacement would only involve removing a few trees, but total sidewalk replacement would involve removing most, if not all, of the trees along Bloomington Street. Mayor Dory inquired about INDOT replacing portions of the sidewalks that are in poor condition as part of the project. In response, INDOT and RQAW designers stated they would discuss Mayor Dory's suggestion, but it is not likely sidewalk replacement along Bloomington Street will take place if it involves additional tree removal within the historic district. SHPO followed up by commenting that the period of significance for the Eastern Enlargement Historic District may not necessarily end at 1961 (50 years prior to the National Register listing), so some of the younger trees may be contributing and removing the trees along Bloomington Street could be an "adverse effect". SHPO alluded to minimizing impacts to curb ramps and minimizing tree removal being a "no adverse effect." During the discussion of the undertaking's potential impacts to Eastern Enlargement Historic District, a consensus emerged among consulting parties that the proposed project along Bloomington Street, would not have an "adverse effect" on Eastern Enlargement Historic District.
- Also regarding the Eastern Enlargement Historic District, the SHPO questioned whether the stone drainage structure identified below Washington Street, east of Locust Street, contributed or not to the Eastern Enlargement Historic District and asked if it would be impacted by full-depth reconstruction. RQAW indicated that it was not mentioned in the National Register nomination and suspects that it is an early stone structure not likely to be explicitly associated with the district. INDOT-CRO further suggested that the stone structure does not contribute to the Historic District, similar to the way historic brick pavers beneath modern asphalt roadways generally do not contribute to historic districts. The SHPO, however, discussed examples of more visible limestone structures in Madison and Aurora, Indiana, which are considered contributing resources. RQAW designers explained that pavement design is under development and impacts to the structure will be determined, but it is likely that the inlets would be capped, and the new storm sewer would run below the eastbound traffic lane.
- Regarding the Courthouse Square Historic District, RQAW explained the proposed improvements and Mayor Dory provided that the existing right-of-way goes up to the front of the buildings and no right-of-way would need to be purchased for sidewalk reconstruction. There was no further discussion of potential effects and there appeared to be consensus that the proposed project would not have an "adverse effect" on the Courthouse Square Historic District.

Following the consulting party meeting, an email dated May 20, 2020, was sent to consulting parties (including representatives from FHWA and INDOT) with a distribution letter providing additional information regarding the stone drainage structure identified within the Eastern Enlargement Historic District and the minutes from that meeting. Please see Appendix D for the distribution letter and the consulting party meeting minutes.

In a letter dated May 26, 2020, the Indiana SHPO staff responded to the information presented before, during, and after the consulting party meeting. The letter clarified INDOT's request for Dual Review, Pursuant to 312 Indiana Administrative Code ("IAC") 20-4-11.5 after the initial stage of Section 106 review, and provides notification of the commencement of the Dual Review to interested persons and members of the Indiana Historic Preservation Review Board. Thus, the comment period for the previous subject matter was extended to 30 days after the Indiana SHPO comments, and ended on June 25, 2020. No other comments in response to the previous letters or consulting party meeting were received.

In addition, the Indiana SHPO staff letter dated May 26, 2020, clarified Point 7 of the consulting party meeting minutes. The letter states. "We [Indiana SHPO] do recall saying that we do think that certain elements of the project's scope would adversely [impact] certain historic districts. We also explained that, if we issue a Director's Letter of Clearance, the Dual Review rule provides interested persons with 15 days from receipt of the letter to ask that the Indiana Historic Preservation Review Board review the project to determine whether or not a certificate of approval should be granted, in spite of the Director's Letter of Clearance."

In the same letter dated May 26, 2020, the Indiana SHPO commented regarding the Area of Potential Effects and changes to the design, stating, "the revised area of potential effects ('APE') presented appears to be of adequate size".

In the same letter dated May 26, 2020, the Indiana SHPO staff commented on the meeting minutes regarding Robe Ann Park stating "we do not think the removal of three trees... will adversely affect the historic park" and "we appreciate the intention to avoid the concrete steps leading from the sidewalk to the park, except for replacing the more modern, concrete landing." In addition, SHPO commented that they "think it would be appropriate to move, repair, turn over to reveal a smoother walking surface if necessary, and reset those limestone steps" that lead to the house north of the main entrance to Robe Ann Park.

In the same letter dated May 26, 2020, the Indiana SHPO staff commented on the meeting minutes regarding to the Eastern Enlargement Historic District. The Indiana SHPO staff provided further discussion on the possible effects of the tree removal along Bloomington Street and then stated, "The removal of a relatively few street trees ..., along with the street pavement milling and overlay and curb, gutter, and curb ramp and driveway approach replacement, would not appear to us to change the Eastern Enlargement Historic District's appearance significantly or to adversely affect the district." The Indiana SHPO staff continued, "even if most or all of the trees within the curb lawn along Bloomington Street were removed ..., we do not think it would have an adverse effect on the Eastern Enlargement Historic District. However, we value the opinions of consulting parties and other interested parties... on whether the street trees contribute to the significance of the district or its setting and whether their removal would adversely affect the district." Please note that no responses from consulting parties or other interested parties have been received.

Additionally, in the same letter dated May 26, 2020, and regarding the Eastern Enlargement Historic District, the Indiana SHPO staff commented on the concrete steps at 3 Bloomington Street (Elisha Braman House in the southeast quadrant of the Washington Street and Bloomington Street intersection. The Indiana SHPO staff stated, "It is proposed that if the concrete steps are to be replaced, they will be replaced 'in kind'... If what is meant here is that if the concrete steps are to be replaced, they would be replaced in concrete and in a configuration as similar as possible to their current configuration, then we do not think their replacement would have an adverse effect on the Eastern Enlargement Historic District."

Additionally, in the same letter dated May 26, 2020, and regarding the Eastern Enlargement Historic District, the Indiana SHPO staff discussed and commented on the stone drainage structure below Washington Street, east of Locust Street. The Indiana SHPO staff stated, "it strikes us as unusual, and its construction and materials (stone blocks and slabs) strongly suggest that it dates from the middle or late 19<sup>th</sup> century, within the period of significance of the Eastern Enlargement Historic District (1840-1961)." The Indiana SHPO staff continued, "We, however, think the stone drainage structure is more like a cistern or a coal cellar – an in-ground structure meant to serve over, above-ground properties but never intended to be easily seen. It is part of the built environment of the Eastern Enlargement Historic District... Whether the stone drainage structure is long enough and has sufficient integrity either to be individually eligible for the NHRP or to contribute to the significance of the district (even though not mentioned in the nomination) cannot be determined from the information currently available, but our lack of knowledge does not mean the structure is necessarily insignificant. The structure is unusual enough that something might be learned from it about the construction of that early type of infrastructure in Indiana that is not already widely known or documented." The Indiana SHPO staff recommended documenting the structure, stating, "If the structure

is uncovered, excavated, or severed by full-depth street replacement or by relocation to the curb lawn or sidewalk of the more modern storm sewer running under the street, we ask that as much of the exterior or interior of the stone structure becomes visible be photographed and interior views be photographed and, if possible that at least its location be sketched on a plan and its interior and exterior cross section measured and sketched to create a permanent record of what was found.”

In response to the SHPO’s request to document the stone drainage structure if it becomes visible during excavation, INDOT plans to implement a Unique Special Provision (USP) in the bid documentation to cover the historic documentation by a qualified historian including; photographs, location plan, cross section sketch, measured plans, and three copies of the previously stated items on archive gold CDs or DVDs. The archive gold CDs or DVDs should then be presented to the SHPO’s staff, the Indiana State Archives, and one or more Putnam County public or not-for-profit entities that are willing to retain the CD or DVD indefinitely.

Lastly, regarding the Eastern Enlargement Historic District, the Indiana SHPO commented in the same letter dated May 26, 2020, that they “do not think that their [trees along Washington Street] replacement will have an adverse effect on the historic district.”

In the same letter dated May 26, 2020, the Indiana SHPO staff commented regarding the Courthouse Square Historic District, stating, “The improvements within this historic district would be similar to those along Washington Street within the Eastern Enlargement Historic District, with the addition of sidewalk replacement up to the edge of the right-of-way at either the front of buildings or at retaining walls and the possible removal of overhead signage and of mid-block pedestrian crosswalks leading to the courthouse. We do not foresee that any of the proposed improvements within the part of the project area lying within the Greencastle Courthouse Square Historic District will adversely affect the district.”

In the same letter dated May 26, 2020, the Indiana SHPO staff commented regarding Archaeology stated, “we agree that no further archaeological investigations are necessary within the expanded project area.”

In an email dated June 19, 2020, Michael LaRonge, on behalf of the Forest County Potawatomi Community, responded to the May 20, 2020, distribution letter and consulting party meeting minutes “offering a finding of no historic properties affected.”

No additional comments/questions were received during Section 106 consultation. Please see Appendix D for all Section 106 correspondence.

A public notice of the FHWA finding of “No Adverse Effect” will be published in *Banner Graphic*. Additionally, the finding and supporting documents will be posted on IN SCOPE. A 30-day comment period will be given, and this document will be updated to reflect any comments received.

## **APPENDICES**

APPENDIX A: Project Area Maps

APPENDIX B: General Photographs

APPENDIX C: Consulting Parties List

APPENDIX D: Consulting Parties Correspondence

APPENDIX E: Historic Property Report and Archeology Summaries

APPENDIX F: Preliminary Plans

US 231 Road Rehabilitation Project  
Greencastle, Putnam County Indiana; Des. No.: 1700121  
Section 106, 800.11

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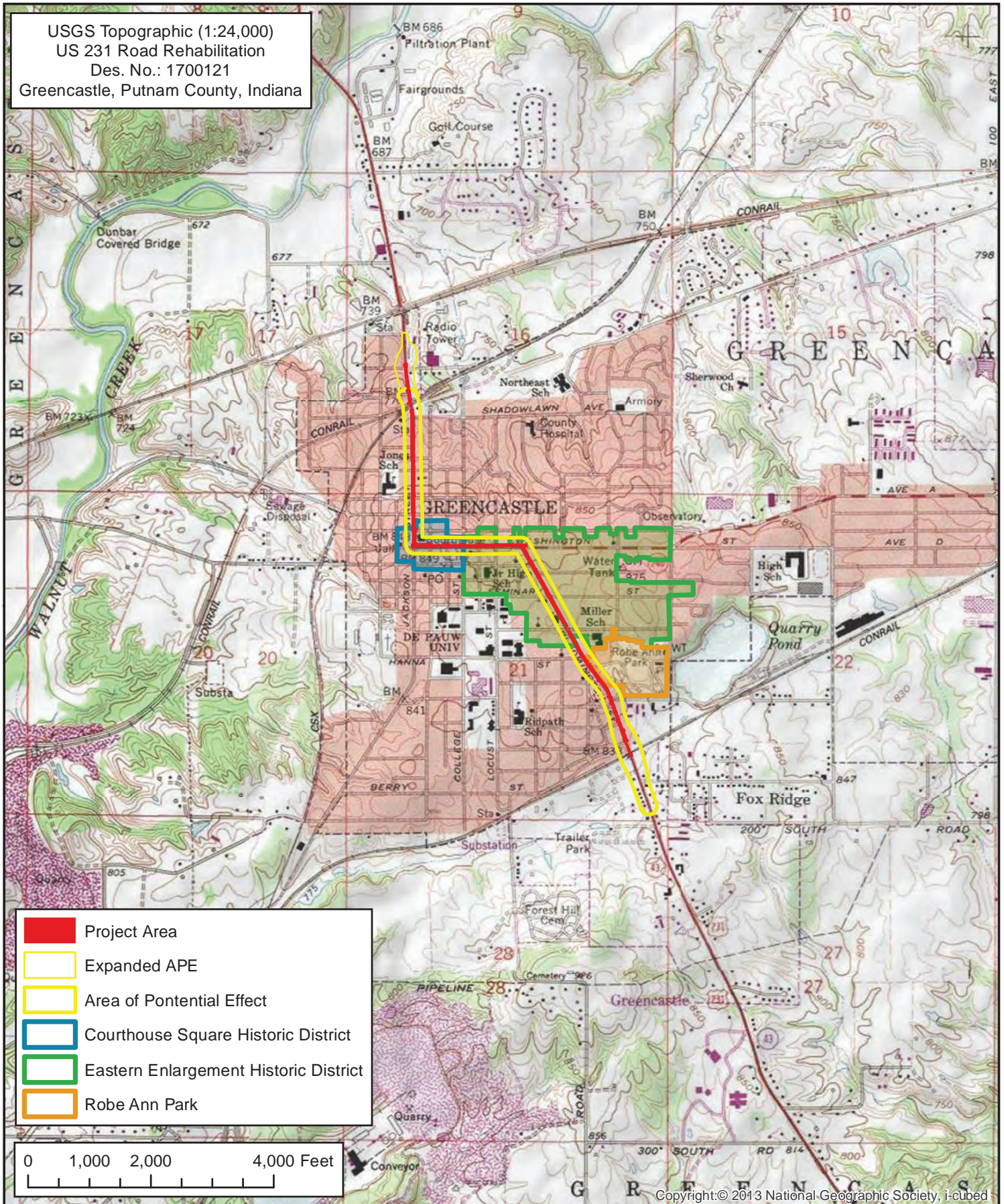
## Appendix A:

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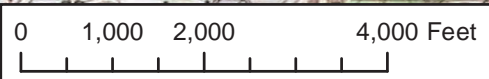
# Project Area Maps

Some project area maps omitted to avoid duplication. See graphics in Appendix B of this CE document.

USGS Topographic (1:24,000)  
 US 231 Road Rehabilitation  
 Des. No.: 1700121  
 Greencastle, Putnam County, Indiana



- Project Area
- Expanded APE
- Area of Pontential Effect
- Courthouse Square Historic District
- Eastern Enlargement Historic District
- Robe Ann Park



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8770 North Street, Suite 110  
 Fishers, IN 46038

This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

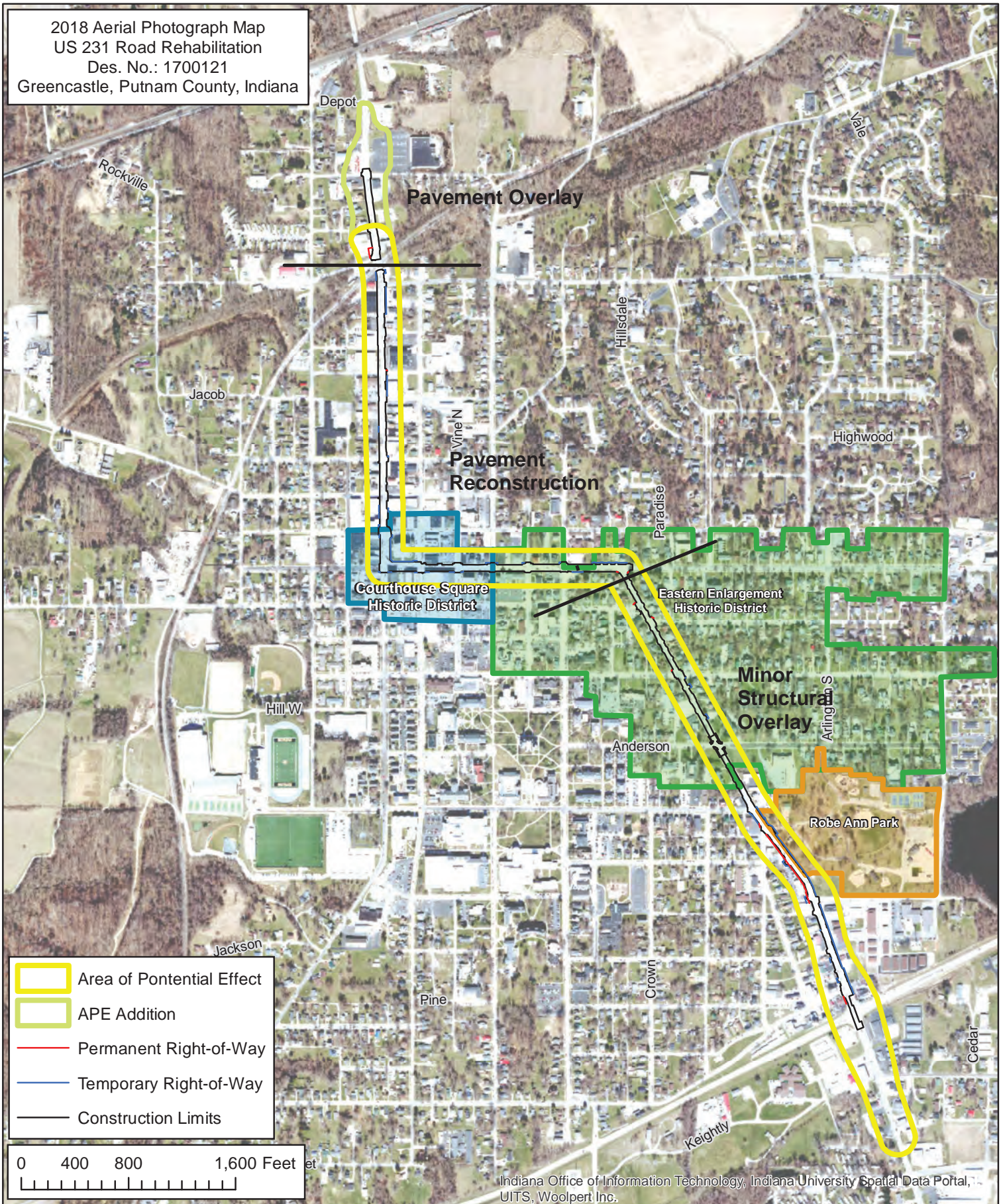
Topographic Quadrangle obtained from USGS (Greencastle Quadrangle)

Map Datum: NAD 83  
 Map Projection: UTM Zone 16 North

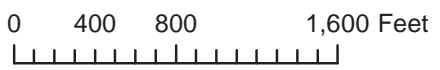




2018 Aerial Photograph Map  
 US 231 Road Rehabilitation  
 Des. No.: 1700121  
 Greencastle, Putnam County, Indiana



- Area of Potential Effect
- APE Addition
- Permanent Right-of-Way
- Temporary Right-of-Way
- Construction Limits



Indiana Office of Information Technology, Indiana University Spatial Data Portal, UITS, Woolpert Inc.



8770 North Street, Suite 110  
 Fishers, IN 46038

This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

Map Datum: NAD 83  
 Map Projection: UTM Zone 16 North



## Appendix B:

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# General Photographs

Photographs omitted to avoid duplication. See graphics in Appendix B of this CE document.

US 231 Road Rehabilitation Project  
Greencastle, Putnam County Indiana; Des. No.: 1700121  
Section 106, 800.11

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## Appendix C:

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# Consulting Parties List

LIST OF INDIVIDUALS/AGENCIES/ORGANIZATIONS  
INVITED TO BE SECTION 106 CONSULTING PARTIES

Position	Agency 1	Agency 2	Address 1	Address 2	City	State	Zip	Email	Notes
Manager of Cultural Resources Section	Indiana Department of Transportation	Office of Environmental Services	100 N. Senate Ave.	Room N642	Indianapolis	IN	46204		
State Historic Preservation Officer	Division of Historic Preservation & Archaeology	Indiana Department of Natural Resources	402 W. Washington St.	Room W274	Indianapolis	IN	46204	JCarr@dnr.IN.gov; BMccord@dnr.in.gov	
Emily Royer	Indiana Landmarks	Western Regional Office	669 Ohio Street		Terre Haute	IN	47807	eroyer@indianalandmarks.org	812-232-4534
Lisa Mock	Putnam County Museum Executive Director	Putnam County Museum	1105 North Jackson Street		Greencastle	IN	46135	lmock@putnamcountymuseum.org	765-653-8419 Verbal acceptance 4/19/2019
	Heritage Preservation Society of Putnam County		941 Evensview Drive		Greencastle	IN	46135	mmkenton@yahoo.com; susanvmurray5@gmail.com; cross2972@yahoo.com	
Larry Tippin	Putnam County Historian		10968 N. 650 E.		Roachdale	IN	46172	ltippin@tds.net	765-522-4156
Lorie L. Hallet	Putnam County Auditor		1 Courthouse Square St.	Suite 20	Greencastle	IN	46135	putnamco.auditor@gmail.com	765-653-5513
Rick Woodall	Putnam County Commissioner (President)		307 Greenwood Ave		Greencastle	IN	46135		765-653-3757
David Berry	Putnam County Commissioner		6912 E St. Rd. 236		Roachdale	IN	46172		765-653-1775
Donald Walton	Putnam County Commissioner		8 N Main St, PO Box 114		Cloverdale	IN	46120		765-653-4449
Michael Ricketts	Putnam County Highway Supervisor		1624 W. CR 225 S		Greencastle	IN	46135	mike@pchwydept.com	765-653-4714
William A. Dory	Greencastle Mayor		1 North Locust Street	P.O. Box 607	Greencastle	IN	46135	bdory@cityofgreencastle.com	765-653-3100
Mike Richmond and Kristin Clary	Main Street Greencastle, Inc.		2 S. Jackson St.		Greencastle	IN	46135	mike@infinitemarketing.co; kristin@gcpcdc.com	765-620-4653
Brad Phillips	Greencastle Superintendent, Dept. of Public Works		502 N. College Street		Greencastle	IN	46135	bphillips@cityofgreencastle.com	765-653-3391
Adam Cohen	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	acohen@cityofgreencastle.com	765-721-3168
Stacie Langdon	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	slangdon@cityofgreencastle.com	765-719-1635

**LIST OF INDIVIDUALS/AGENCIES/ORGANIZATIONS  
INVITED TO BE SECTION 106 CONSULTING PARTIES**

Position	Agency 1	Agency 2	Address 1	Address 2	City	State	Zip	Email	Notes
Steve Fields	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	sfields@cityofgreencastle.com	765-721-2278
Tyler Wade	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	twade@cityofgreencastle.com	765-247-9531
Mark N. Hammer	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	mhammercpa@gmail.com	765-653-6941
Gary Lemon	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	glemon@cityofgreencastle.com	765-653-8574
Dave Murray	Common Council (City Council)		1 North Locust Street		Greencastle	IN	46135	dmurray@collegecosts.com	765-653-7877
Ron Hinsenkamp	West Central Indiana Economic Development District, Inc.		1718 Wabash Ave.		Terre Hatue	IN	47807	rhinsenkamp@westcentralin.com	812-238-1561
	Eastern Shawnee Tribe of Oklahoma								
<b>Diane Hunter</b>	<b>Miami Tribe of Oklahoma</b>							<b>dhunter@miamination.com</b>	<b>918-541-8966</b>
	Peoria Tribe of Indians of Oklahoma								
	Pokagon Band of Potawatomi Indians								
<b>Michael LaRonge</b>	<b>Forest County Potawatomi Community</b>							<b>Michael.LaRonge@fcpotawatomi-nsn.gov</b>	<b>715-478-7354</b>
Rob Weinschenk	Greencastle Parks & Recreation Department		405 W. Bloomington St.		Greencastle	IN	46135	rweinschenk@cityofgreencastle.com	765-653-3395
Jeff Hubble	Greencastle Community School Corporation		1002 Mill Pond Lane		Greencastle	IN	46135	jhubble@greencastle.k12.in.us	765-653-9771
Mark McCoy	DePauw University		Studebaker Administration Building	313 South Locust St.	Greencastle	IN	46135	president@depauw.edu	765-658-4800

Note: Federal Highway Administration (FHWA), INDOT Cultural Resources Office (INDOT-CRO), and the State Historic Preservation Officer (SHPO) are automatically consulting parties. Consulting parties that responded are in **bold** and highlighted.

US 231 Road Rehabilitation Project  
Greencastle, Putnam County Indiana; Des. No.: 1700121  
Section 106, 800.11

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## Appendix D:

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# Consulting Parties Correspondence



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness, Commissioner**

March 4, 2019

This letter was sent to the listed parties.

RE: DES Number 1700121  
US 231 Road Rehabilitation Project  
Greencastle, Putnam County, Indiana

Dear Consulting Party (see attached list),

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 Road Rehabilitation Project, Des. No. 1700121. RQAW is under contract with INDOT 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 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 US 231 and extends approximately 1.7 miles from South Street (approximately 1,200 feet south of SR 240) north to approximately 100 feet north of Shadowlawn Ave. in Putnam County, Indiana. It is within Greencastle Township, Greencastle USGS Topographic Quadrangle, in Sections 16 & 21, Township 14 North, Range 4 West.

The primary need for the project is based on the deteriorated pavement structure and poor storm water drainage. The pavement in the southern half of the project area is experiencing fatigue cracking in the wheel path and near the curb line, reflective cracking from the underlying concrete and age hardening of the asphalt surface material. The northern half of the project area is experiencing severe pavement distresses due in part to an antiquated water line utility. Furthermore, the existing storm water drainage system does not adequately convey storm water during heavy rain events, resulting in poor drainage with ponding. The overall condition of US 231 in Greencastle is recorded as poor. A secondary need is that curb ramps do not meet current Americans with Disabilities Act (ADA) standards.

The primary purpose is to address pavement and drainage issues and a secondary purpose is to provide ADA compliant pedestrian facilities. The proposed alternative for this project includes rehabilitating or replacing the pavement, replacing the storm sewer, reconstructing the shoulders, curbs, gutters, inlets and curb ramps to meet current ADA regulations. The project is anticipated to be let in 2022. Temporary and permanent right-of-way is anticipated. Access to residences and businesses along US 231 will be continuously maintained during construction.

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 <http://www.achp.gov/citizensguide.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.

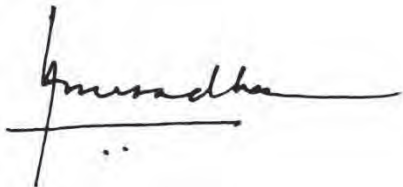
Please review the information and comment within thirty (30) calendar days of receipt. If you indicate that you do not desire to be a consulting party, or if you do not respond, you will not be included on the list of consulting parties for this project. If we do not receive your response in the time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

For questions concerning specific project details, you may contact Kyle Boot of RQAW at 317-588-1762 or [kboot@rqaw.com](mailto:kboot@rqaw.com). All future responses regarding the proposed project should be forwarded to RQAW at the following address:

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, IN 46038  
[kboot@rqaw.com](mailto:kboot@rqaw.com)

Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services



Enclosures: General Location Map  
USGS Topographic Map

Distribution List: Chad Slider, for Indiana State Historic Preservation Officer (SHPO)  
Emily Royer, Indiana Landmarks, Western Regional Office  
Lisa Mock, Putnam County Museum Executive Director  
Kenneth Eitel, Heritage Preservation Society of Putnam County  
Larry Tippin, Putnam County Historian  
Marilyn Clearwaters, Putnam County Historical Society  
Lorie L. Hallet, Putnam County Auditor  
Rick Woodall, Putnam County Commissioner (President)  
David Berry, Putnam County Commissioner  
Donald Walton, Putnam County Commissioner  
Michael Ricketts, Putnam County Highway Supervisor  
William A. Dory, Greencastle Mayor  
Gary Barcus or Lisa Gibson, Main Street Greencastle, Inc.  
Brad Phillips, Greencastle Superintendent, Dept. of Public Works  
Adam Cohen, Common Council (City Council)  
Stacie Langdon, Common Council (City Council)  
Steve Fields, Common Council (City Council)  
Tyler Wade, Common Council (City Council)  
Mark N. Hammer, Common Council (City Council)  
Gary Lemon, Common Council (City Council)  
Dave Murray, Common Council (City Council)  
Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.  
Eastern Shawnee Tribe of Oklahoma  
Forest County Potawatomi Community  
Miami Tribe of Oklahoma  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indians

## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Monday, March 4, 2019 8:35 AM  
**To:** 'eroyer@indianalandmarks.org'; 'lmock@putnamcountymuseum.org'; 'ltippin@tds.net'; 'loriehallettpcauditor@yahoo.com'; 'putnamco.auditor@gmail.com'; 'mike@pchwydept.com'; 'bdory@cityofgreencastle.com'; 'mike@infinitemarketing.co'; 'mainstreetgreencastle@airhop.com'; 'bphillips@cityofgreencastle.com'; 'acohen@cityofgreencastle.com'; 'slangdon@cityofgreencastle.com'; 'sfields@cityofgreencastle.com'; 'twade@cityofgreencastle.com'; 'mhammercpa@gmail.com'; 'glemon@cityofgreencastle.com'; 'dmurray@collegcosts.com'; 'rhinsenkamp@westcentralin.com'  
**Cc:** 'Alexander, Kelyn'; 'Branigin, Susan'; Shaun Miller (smiller@indot.IN.gov); 'Joseph Dabkowski'; Aaron Lawson; Lisa Casler; Haylee Moscato; Jaime Byerly  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231RdRehab\_Des1700121\_ECL\_2019-03-04.pdf

**Des. No.: 1700121**

**Project Description: US 231 Road Rehabilitation**

**Location: Greencastle, Putnam County, Indiana**

The Indiana Department of Transportation, with funding from the Federal Highway Administration, proposes to proceed with the US 231 Road Rehabilitation Project, Des. No. 1700121.

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:

Chad Slider, for Indiana State Historic Preservation Officer (SHPO)  
Emily Royer, Indiana Landmarks, Western Regional Office  
Lisa Mock, Putnam County Museum Executive Director  
Kenneth Eitel, Heritage Preservation Society of Putnam County  
Larry Tippin, Putnam County Historian  
Marilyn Clearwaters, Putnam County Historical Society  
Lorie L. Hallet, Putnam County Auditor  
Rick Woodall, Putnam County Commissioner (President)  
David Berry, Putnam County Commissioner  
Donald Walton, Putnam County Commissioner  
Michael Ricketts, Putnam County Highway Supervisor  
William A. Dory, Greencastle Mayor  
Gary Barcus or Lisa Gibson, Main Street Greencastle, Inc.  
Brad Phillips, Greencastle Superintendent, Dept. of Public Works  
Adam Cohen, Common Council (City Council)  
Stacie Langdon, Common Council (City Council)  
Steve Fields, Common Council (City Council)  
Tyler Wade, Common Council (City Council)  
Mark N. Hammer, Common Council (City Council)  
Gary Lemon, Common Council (City Council)  
Dave Murray, Common Council (City Council)  
Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.  
Eastern Shawnee Tribe of Oklahoma  
Forest County Potawatomi Community

Miami Tribe of Oklahoma  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indians

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 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 letter 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. If we do not receive a response from an invited consulting party in the time allotted, the project will proceed consistent with the proposed design. **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 may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,  
Kyle Boot



**Kyle Boot | Architectural Historian**

8770 North St., Ste. 110

Fishers, IN 46038

O: 317.588.1798

C: 317.410.0845

[www.rqaw.com](http://www.rqaw.com)



## Kyle J. Boot

---

**From:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Sent:** Monday, March 4, 2019 8:47 AM  
**To:** thpo@estoo.net; dhunter@miamination.com; lpappenfort@peoriatribe.com; Matthew.Bussler@pokagonband-nsn.gov; Allison.Daniels@fcpotawatomi-nsn.gov  
**Cc:** Miller, Shaun (INDOT); Kumar, Anuradha; Branigin, Susan; michelle.allen@dot.gov; Kyle J. Boot; Walls, Steven  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231RdRehab\_Des1700121\_ECL\_2019-03-04.pdf

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

**Des. No.: 1700121**

**Project Description: US 231 Road Rehabilitation**

**Location: Greencastle, Putnam County, Indiana**

The Indiana Department of Transportation, with funding from the Federal Highway Administration, proposes to proceed with the US 231 Road Rehabilitation Project, Des. No. 1700121.

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:

Chad Slider, for Indiana State Historic Preservation Officer (SHPO)  
Emily Royer, Indiana Landmarks, Western Regional Office  
Lisa Mock, Putnam County Museum Executive Director  
Kenneth Eitel, Heritage Preservation Society of Putnam County  
Larry Tippin, Putnam County Historian  
Marilyn Clearwaters, Putnam County Historical Society  
Lorie L. Hallet, Putnam County Auditor  
Rick Woodall, Putnam County Commissioner (President)  
David Berry, Putnam County Commissioner  
Donald Walton, Putnam County Commissioner  
Michael Ricketts, Putnam County Highway Supervisor  
William A. Dory, Greencastle Mayor  
Gary Barcus or Lisa Gibson, Main Street Greencastle, Inc.  
Brad Phillips, Greencastle Superintendent, Dept. of Public Works  
Adam Cohen, Common Council (City Council)  
Stacie Langdon, Common Council (City Council)  
Steve Fields, Common Council (City Council)  
Tyler Wade, Common Council (City Council)  
Mark N. Hammer, Common Council (City Council)  
Gary Lemon, Common Council (City Council)  
Dave Murray, Common Council (City Council)  
Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.  
Eastern Shawnee Tribe of Oklahoma  
Forest County Potawatomi Community  
Miami Tribe of Oklahoma  
Peoria Tribe of Indians of Oklahoma

Pokagon Band of Potawatomi Indians

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 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 letter 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. If we do not receive a response from an invited consulting party in the time allotted, the project will proceed consistent with the proposed design. **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 may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,

**Kelyn Alexander**  
*Historian*  
*Cultural Resources Office*  
*Environmental Services*  
100 N. Senate Ave., Room N642  
Indianapolis, IN 46204  
**Office:** (317) 234-4147  
**Email:** [kalexander3@indot.in.gov](mailto:kalexander3@indot.in.gov)



**\*\*Updated Historic Property Report (HPR) guidelines can be found [here](#)**

## Kyle J. Boot

---

**From:** Bill Dory <bdory@cityofgreencastle.com>  
**Sent:** Monday, March 4, 2019 8:54 AM  
**To:** Kyle J. Boot  
**Subject:** RE: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Kyle:

The proposed project is located in two National Register historic districts. US 231 east of College Street runs through the Eastern Enlargement Historic District. US 231 west of College to just north of Franklin Street runs through the Courthouse Square Historic District. A simple resurfacing project should not have an adverse impact on any historic resources as US 231 has been resurfaced several times over the years. Note that from Bloomington Street to Vine Street, new sidewalks were installed as part of the Stellar Communities efforts. There should be some Section 106 documentation on file with DNR for the project.

As I am sure you are aware, the district location information is available on DNR's SHAARD website.

This winter has been rough on the pavement.

Thank you for reaching out to the city on this project.

Bill Dory  
Mayor  
City of Greencastle  
765-653-3100

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**City Of  
Greencastle**

Go Green! Save a tree – print this e-mail only if necessary.

---

**From:** Kyle J. Boot [mailto:KBoot@RQAW.com]  
**Sent:** Monday, March 04, 2019 8:35 AM  
**To:** eroyer@indianalandmarks.org; lmock@putnamcountymuseum.org; ltippin@tds.net; loriehallettpcauditor@yahoo.com; putnamco.auditor@gmail.com; mike@pchwydept.com; bdory@cityofgreencastle.com; mike@infinitemarketing.co; mainstreetgreencastle@airhop.com; bphillips@cityofgreencastle.com; acohen@cityofgreencastle.com; slangdon@cityofgreencastle.com; sfields@cityofgreencastle.com; twade@cityofgreencastle.com; mhammercpa@gmail.com; glemon@cityofgreencastle.com; dmurray@collegecosts.com; rhinsenkamp@westcentralin.com  
**Cc:** Alexander, Kelyn; Branigin, Susan; Shaun Miller (smiller@indot.IN.gov); Joseph Dabkowski; Aaron Lawson; Lisa Casler; Haylee Moscato; Jaime Byerly  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

**Des. No.: 1700121**

## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Friday, March 8, 2019 12:10 PM  
**To:** 'Michael Richmond'  
**Cc:** 'Alexander, Kelyn'  
**Subject:** RE: US 231 Road Rehabilitation, Des. No. 1700121

Dear Mike,

Thanks for your response. I've updated our records with the contact information that you've provided below and are including Main Street Greencastle, Inc. as a consulting party in this Section 106 process. You should receive subsequent Section 106 correspondence via email when it comes available.

Thanks again for the updated information and have a great weekend!  
Kyle

### Kyle Boot | Architectural Historian

O: 317.588.1798

C: 317.410.0845

[www.rqaw.com](http://www.rqaw.com)

---

**From:** Michael Richmond <mike@infinitimarketing.co>  
**Sent:** Friday, March 8, 2019 12:01 PM  
**To:** Kyle J. Boot <KBoot@RQAW.com>  
**Subject:** US 231 Road Rehabilitation, Des. No. 1700121

Good afternoon Kyle,

My name is Mike Richmond, I represent Main Street Greencastle as the Executive Director. I just received, by mail, the letter regarding the Road Rehabilitation in Greencastle. It appears the contact information is very outdated - I would like to get it updated if possible. Gary Barcus & Lisa Gibson have not been involved with Main Street for a number of years. Would you please change the contact information to the following:

Mike Richmond

765-620-4653

[mike@infinitimarketing.co](mailto:mike@infinitimarketing.co)

Main Street Greencastle, Inc - Executive Director.

Thank you!

## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Tuesday, March 12, 2019 8:54 AM  
**To:** 'Phillip Gick'; Ken Eitel  
**Cc:** mmkenton@yahoo.com; susanvmurray5@gmail.com; 'kristin@gpcpcdc.com'; 'Alexander, Kelyn'; Haylee Moscato; 'Michael Richmond'  
**Subject:** RE: DES Number 1700121, US 231 Road Rehabilitation Project

Please note that no response from the Heritage Preservation Society accepting CP status was received.

Dear Ken and Phil,

Thank you for passing this along to the current President and Secretary of the Heritage Preservation Society. I've updated our current contact information for the society to their email addresses. [mmkenton@yahoo.com](mailto:mmkenton@yahoo.com) and [susanvmurray5@gmail.com](mailto:susanvmurray5@gmail.com) should receive subsequent Section 106 correspondence via email when it comes available.

In regards to the Main Street Greencastle, Inc., I received an email from Mike Richmond on March 8, 2019, accepting to be a consulting party and providing his current contact information. We'll go ahead and include Ms. Clary's email address as an additional contact for Main Street Greencastle, Inc.

Thanks again,  
Kyle

### Kyle Boot | Architectural Historian

O: 317.588.1798  
C: 317.410.0845  
[www.rqaw.com](http://www.rqaw.com)

---

**From:** Phillip Gick <phillipgick@hotmail.com>  
**Sent:** Tuesday, March 12, 2019 8:19 AM  
**To:** Ken Eitel <keneitel@gmail.com>; Kyle J. Boot <KBoot@RQAW.com>  
**Cc:** mmkenton@yahoo.com; susanvmurray5@gmail.com; Phillip Gick <phillipgick@hotmail.com>  
**Subject:** Re: DES Number 1700121, US 231 Road Rehabilitation Project

Ken:  
Thanks for passing this along. I have included the current President and Secretary of Heritage Preservation Society on this email.  
Phil

Sent from [Outlook](#)

---

**From:** Ken Eitel <[keneitel@gmail.com](mailto:keneitel@gmail.com)>  
**Sent:** Monday, March 11, 2019 4:36 PM  
**To:** [kboot@rqaw.com](mailto:kboot@rqaw.com)  
**Cc:** Gick Phillip - Hotmail Account; Bill Dory; Kristin Clary  
**Subject:** RE: DES Number 1700121, US 231 Road Rehabilitation Project

Mr. Boot,



I have received the consultation party notice on this project. I am advising you I no longer represent the Heritage Preservation Society of Putnam County. I've copied Phil Gick who will be able to obtain the name of a representative.

Related, the representation for Main Street Greencastle, Inc. is Ms. Kristin Clary., 2 S. Jackson St., Greencastle, IN 46135. I've also copied her on the email.

Thank you, Kenneth Eitel

--

**Ken Eitel**  
Greencastle, IN 46135  
[765.721.7985](tel:765.721.7985) (C)

This e-mail is intended for the original recipient(s). This communication is for use by the intended recipient(s) and contains information that may be confidential.



## 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](http://www.miamination.com)



March 19, 2019

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

Re: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana –  
Comments of the Miami Tribe of Oklahoma

Dear Mr. Miller:

Aya, kikwehsitoole – I show you respect. My name is Diane Hunter, and I am the Tribal Historic Preservation Officer for the Federally Recognized Miami Tribe of Oklahoma. In this capacity, I am the Miami Tribe's point of contact for all Section 106 issues.

The Miami Tribe offers no objection to the above-mentioned 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, as this site is within the aboriginal homelands of the Miami Tribe, 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](mailto: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 Natural Resources

Eric Holcomb, Governor  
Cameron F. Clark, 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



April 4, 2019

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, Indiana 46038

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

Re: Early Coordination Letter for the US 231 Road Rehabilitation Project, in Greencastle,  
Putnam County, Indiana (Designation No. 1700121; DHPA No. 23587)

Dear Mr. Boot:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the "Programmatic Agreement among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation, 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 has conducted an analysis of the materials dated March 4, 2019 and received on March 11, 2019, for the above indicated project in the City of Greencastle, Greencastle Township, Putnam County, Indiana.

Thank you for notifying our office of the proposed pavement and stormwater drainage system replacement and ADA-compliant pedestrian facilities project, which will extend from South Street (1,200 feet south of SR 240) to approximately 100 feet north of Shadowlawn Avenue.

The only additional parties we would recommend be invited to become consulting parties for the purposes of the Section 106 review of this project, beyond those whom INDOT already has invited are the Greencastle Community School Corporation and DePauw University, because of the potential for disruption of traffic to and from their facilities.

For future reference, it probably is not necessary to invite members of the county council, in addition to the county commissioners and either the county engineer or the county highway supervisor, to become consulting parties to represent county government in a Section 106 consultation. The county commissioners are responsible for supervising the construction and maintenance of roads and bridges. Please refer to <https://www.pfw.edu/dotAsset/c78253c7-7f49-4d54-b3aa-6c44ccd4d8db.pdf>.

We realize that access to businesses and residences along SR 231 within the project area will be maintained during the project. However, it is unclear whether other local or non-local traffic would be diverted by an official detour or would seek unofficial detours during construction. Consequently, when a proposed area of potential effects ("APE") is being developed, it would be advisable to consider whether either the official detour or unofficial detours would likely send

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Kyle Boot  
April 4, 2019  
Page 2

greatly increased traffic into areas where there might be historic buildings or districts and whether the APE boundaries should be adjusted to take the effects of that increased traffic into account.

It is our understanding that additional information regarding historic and archaeological resources in the area of potential effects will be forthcoming.

*A copy of the revised 36 C.F.R. Part 800 regulations that took effect on August 5, 2004 may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference.* The archaeological reviewer for this project on the Indiana SHPO staff is Beth McCord, and the structures reviewer is John Carr. However, if you have questions about our comments or about the review process, please contact initially the INDOT Cultural Resources Office staff members assigned to this project.

In all future correspondence regarding the US 231 Road Rehabilitation Project in Greencastle (Des. No. 1700121), please refer to DHPA No. 23587.

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:JLC:jlc

emc: Robert Dirks, P.E., FHWA  
Michelle Allen, P.E., FHWA  
Anuradha Kumar, INDOT  
Shaun Miller, INDOT  
Susan Branigin, INDOT  
Shirley Clark, INDOT  
Kyle Boot, RQAW  
Beth K. McCord, INDNR-DHPA  
John Carr, INDNR-DHPA



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness, Commissioner**

July 16, 2019

This letter was sent to the listed parties.

RE: US 231 Road Rehabilitation Project  
Greencastle, Putnam County, Indiana  
Des. No. 1700121  
DHPA No. 23587

Dear Consulting Party (see attached list),

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration (FHWA), proposes to proceed with US 231 Road Rehabilitation project, Des. No. 1700121. RQAW is under contract with INDOT to advance the environmental documentation for the referenced project.

This letter is part of the Section 106 review process for this project. A Section 106 early coordination letter was distributed on March 4, 2019.

The proposed undertaking is on US 231 and extends approximately 1.7 miles from South Street (approximately 1,200 feet south of SR 240) north to approximately 100 feet north of Shadowlawn Ave. in the City of Greencastle, Putnam County, Indiana. It is within Greencastle Township, Greencastle USGS Topographic Quadrangle, in Sections 16 & 21, Township 14 North, Range 4 West.

The primary need for the project is based on the deteriorated pavement structure and poor storm water drainage along the project route. Currently US 231 through Greencastle can be broken into northern and southern halves. The northern half includes the project beginning to Washington Street/Bloomington Street intersection (0.87 miles). The southern half includes the Washington Street/Bloomington Street intersection to the project end (0.80 mile). The pavement in the southern half of the project area (Bloomington Street) is experiencing fatigue cracking in the wheel path and near the curb line, reflective cracking from the underlying concrete and age-hardening of the asphalt surface material. The northern half of the project area (Washington and Jackson streets) is experiencing severe pavement distresses due in part to an antiquated water line utility. Furthermore, the existing storm water drainage system does not adequately convey storm water during heavy rain events, resulting in poor drainage with ponding. Thus, the draft engineering assessment has recorded the overall condition of US 231 in Greencastle as poor. A secondary need for the project is that curb ramps do not meet current Americans with Disabilities Act (ADA) compliance standards.

The primary purpose for the project is to address pavement and drainage issues and a secondary purpose is to provide ADA-compliant pedestrian facilities. The project is anticipated to be let in 2022. Temporary and permanent right-of-way are anticipated, but amounts are unknown at this time. Access to residences and businesses along US 231 will be continuously maintained during construction.

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The proposed alternative for this project includes the following according to the two different pavement condition areas. The southern half will receive a minor structural overlay: milled to a two-inch depth and overlaid with four inches of pavement. This will result in pavement that is two inches above existing grade. Therefore, additional work will include: 1) replacing the curb and gutters; 2) replacing curb ramps not meeting current ADA regulations; 3) replacing sidewalks that are adjacent to replaced curbs. These sidewalks may be increased to current ADA-width standards. Sidewalks behind a grass buffer (lawn between the back of curb and sidewalks) will remain in place and are not anticipated to receive work at this time. The grass buffer will remain in place. Drainage structures will not be impacted except to adjust casting grades. The stamped concrete at the US 231 and Anderson Street intersection will remain in place. Full-depth pavement replacement will occur adjacent to this intersection to properly tie in pavement elevations.

The pavement will be replaced at full-depth in the northern half of the project area. The roadway foot print and grade will stay the same. Additional work will include the following: 1) replacing the curbs and gutters at current location; 2) replacing the storm sewer and installing new inlets; 3) replacing all curb ramps and sidewalks that do not meet current ADA regulations; 4) replacing sidewalks adjacent to the back of curb; 5) replacing and moving the water line outside of the roadway to below the grass buffer or the sidewalk (location to be determined later in design).

The crosswalks, sidewalks, and an ADA-compliant route to the Putnam County Courthouse are to be determined during design. At this time, it is anticipated that the project will involve the following: 1) removing the crosswalks in the center of the block (west and south of the Putnam County Courthouse); 2) maintaining the wide curb along the inside of edge of Jackson and Washington streets; 3) removing the overhead sign structures west and south of the courthouse; and 4) supporting the ADA-compliant access to the courthouse in the middle of the Indiana Street block with an ADA-compliant crosswalk across Washington Street at the east side of Indiana Street.

Finally, construction anticipates avoiding impacts to trees within grass buffers because work to those sidewalks is not anticipated. However, where sidewalks may be replaced (along areas where no grass buffer is present), trees immediately adjacent to those sidewalks may be impacted.

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 were invited to become a consulting party as part of the Section 106 process. Entities that have accepted consulting party status are identified in the attached list.

In their April 4, 2019 response to the prior invitation, the Indiana State Historic Preservation Office (SHPO) staff recommended inviting the Greencastle Community School Corporation and DePauw University. Additionally, INDOT's Section 106 guidance recommends that owners of recommended historic resources be invited to become consulting parties. Robe Ann Park is owned and managed by the Greencastle Parks & Recreation Department and is recommended eligible for listing in the National Register of Historic Places (NRHP). As such, the three parties mentioned above are being sent this correspondence, asked to review the early coordination letter dated March 4, 2019 on IN SCOPE (see below), and invited to become a consulting party.

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. The APE contains two resources (Courthouse Square Historic District, and Eastern Enlargement Historic District) 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, Robe Ann Park (IHSSI #133-250-69053) is recommended as eligible for listing in the NRHP under Criterion A.

With regards to archaeological resources, an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards identified no sites within the project area and no further work is recommended.

The Historic Property Report and Archaeology Report (Tribes only) are available for review in IN SCOPE at <http://erms.indot.in.gov/Section106 Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). You are invited to review these documents and 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 within seven (7) days.

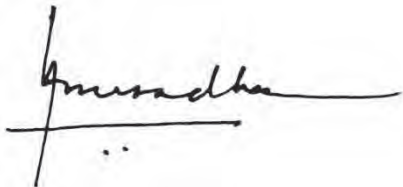
Please review the information and comment within thirty (30) calendar days of receipt.

For questions concerning specific project details, you may contact Kyle Boot of RQAW at 317-588-1762 or [kboot@rqaw.com](mailto:kboot@rqaw.com). All future responses regarding the proposed project should be forwarded to RQAW at the following address:

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, IN 46038  
[kboot@rqaw.com](mailto:kboot@rqaw.com).

Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

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Enclosures: Topographic map showing project area

Removed to reduce the size of  
the 800.11 document.

Distribution List: Chad Slider, for Indiana State Historic Preservation Officer (SHPO)  
Lisa Mock, Putnam County Museum  
Heritage Preservation Society of Putnam County  
Mayor Dory, Greencastle  
Mike Richmond, Main Street Greencastle, Inc.  
Miami Tribe of Oklahoma  
Greencastle School Corporation  
DePauw University  
Greencastle Parks & Recreation Department



## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Tuesday, July 16, 2019 2:32 PM  
**To:** 'Slider, Chad (DNR (CSlider@dnr.IN.gov))'; lmock@putnamcountymuseum.org; mmkenton@yahoo.com; susanvmurray5@gmail.com; Susan Price Gick; Bill Dory; rweinschenk@cityofgreencastle.com; jhubble@greencastle.k12.in.us; president@depauw.edu; Michael Richmond  
**Cc:** Alexander, Kelyn; 'mcoon@indot.in.gov'; Branigin, Susan; Shaun Miller (smiller@indot.IN.gov); 'akumar@indot.in.gov'; Lisa Casler; 'Joseph Dabkowski'; Aaron Lawson  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231RdRehab\_Des1700121\_HPRLtr\_2019-07-16.pdf

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a Historic Property Report and Archaeology Report (Tribes only) 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,  
Kyle Boot



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*Indy Star's Top Workplaces, 2019*



## Kyle J. Boot

---

**From:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Sent:** Tuesday, July 16, 2019 2:59 PM  
**To:** dhunter@miamination.com  
**Cc:** Miller, Shaun (INDOT); Branigin, Susan; Kumar, Anuradha; michelle.allen@dot.gov; Kyle J. Boot; Coon, Matthew; Lisa Casler; Joseph Dabkowski; Aaron Lawson; Carr, John; McCord, Beth K; Walls, Steven  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231RdRehab\_Des1700121\_HPRLtr\_2019-07-16.pdf

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a Historic Property Report and Archaeology Report (Tribes only) 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,

**Kelyn Alexander**

*Historian*

*Cultural Resources Office*

*Environmental Services*

100 N. Senate Ave., Room N642

Indianapolis, IN 46204

**Office:** (317) 234-4147

**Email:** [kalexander3@indot.in.gov](mailto:kalexander3@indot.in.gov)



**\*\* Historic Property Report (HPR) guidelines can be found [here](#)**



Indiana Department  
of Natural Resources

Eric Holcomb, Governor  
Cameron F. Clark, 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



August 14, 2019

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, Indiana 46038

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

Re: Archaeology short report (Curran 6/21/2019) and historic property report (Boot 7/16/2019)  
for the US 231 Road Rehabilitation Project, in Greencastle, Putnam County, Indiana  
(Designation No. 1700121; DHPA No. 23587)

Dear Mr. Boot:

Pursuant to Section 106 of the National Historic Preservation Act (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 ("INDNR-DHPA staff" or "INDNR-DHPA") has conducted an analysis of the materials dated July 16, 2019 and received on July 18, 2019, for the above indicated project within the City of Greencastle, Putnam County, Indiana.

Thank you for inviting the additional consulting parties we had recommended in our April 4 letter. We will take note of which invited parties are copied in INDOT's next letter on this project, as an indication of those who have accepted consulting party status, and we may adjust accordingly the list of parties that we copy electronically in the future.

The area of potential effects ("APE") proposed in the historic property report ("HPR"; Boot 7/16/2019) appears to be of adequate size to encompass the geographic area in which foreseeable effects of this project on historic properties could occur, based on where excavation and construction activities have been described generally to occur. Both of INDOT's letters so far (March 4, 2019, and July 16) have stated that "[a]ccess to businesses and residences along US 231 will be continuously maintained during construction." We are hopeful that such maintenance of access will avoid adverse effects on the historic properties identified in the HPR from the construction's causing impediments to, or changes in, their use, but maintenance of access could simply mean that residents, business people, and customers will be allowed to drive around barricades for short distances. In our April 4 letter, however, we urged that consideration be given to how official and unofficial detours for non-local traffic (i.e., through traffic) might cause traffic to divert to other areas where historic districts or individual historic properties might exist and where increased traffic could make access to those historic properties difficult (e.g., if the

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Kyle Boot  
August 14, 2019  
Page 2

detours would include narrow streets where congestion is likely to occur). In such a case, establishing an APE for a likely detour route might be in order. We would appreciate receiving feedback on whether consideration of effects of likely detours has been taken into account.

Based upon the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places ("NRHP") within the proposed project area. As documented in the archaeological report (Curran 6/21/2019), the proposed project area lies within areas disturbed by previous construction of a recent and non-historical nature except for the northern portion of Robe Ann Park and no archaeological resources were identified. It is our opinion that no further archaeological investigations appear necessary at this proposed project area.

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 must be reported to the INDNR-DHPA 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 Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.

We agree with the HPR that the NRHP-listed Courthouse Square Historic District and Eastern Enlargement Historic District retain sufficient integrity to remain eligible for listing.

We also agree with the HPR, for the purposes of the Section 106 review of this project, that Robe Ann Park (Indiana Historic Sites and Structures Inventory No. 133-250-69053) is eligible for the NRHP under Criterion A.

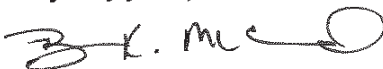
Based on the information in the HPR, we agree that there do not appear to be any other, above-ground properties within the APE that would be eligible for the NRHP.

INDOT's July 16 letter says it is anticipated that both temporary and permanent right-of-way will be required, but the amount is not yet known. Accordingly, we will need to see plans showing right-of-way acquisition, excavation, construction work, and tree removal and planting for those sections of the project area where work will occur within the historic districts and adjacent to Robe Ann Park, in order to assess the project's effects. It would be helpful if, along with the plans, a narrative description of the project's anticipated effects on those historic properties were included.

The archaeological reviewer for this project on the Indiana SHPO staff is Beth McCord, and the structures reviewer is John Carr. However, if you have questions about our comments or about the review process, please contact initially the INDOT Cultural Resources Office staff members assigned to this project.

In all future correspondence regarding the US 231 Road Rehabilitation Project in Greencastle (Des. No. 1700121), please refer to DHPA No. 23587.

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:JLC:jlc

emc: Michelle Allen, P.E., FHWA  
Robert Dirks, P.E., FHWA  
Anuradha Kumar, INDOT

Shaun Miller, INDOT  
Susan Branigin, INDOT  
Kelyn Alexander, INDOT  
Matthew Coon, Ph.D., INDOT  
Shirley Clark, INDOT  
Steven Walls, INDOT, Crawfordsville District  
Kyle Boot, RQAW  
Andrew Martin, RPA, Cultural Resource Analysts, Inc.  
Miami Nation of Oklahoma  
The Honorable William A. Dory, Jr., Mayor of Greencastle  
Brad Phillips, Superintendent, Greencastle  
Department of Public Works  
Rob Weinschenk, Greencastle Parks & Recreation Department  
Board of Commissioners of Putnam County,  
c/o Lorie Hallett, County Auditor  
Putnam County Museum  
Heritage Preservation Society of Putnam County  
Main Street Greencastle  
Dr. Mark McCoy, President, DePauw University  
Jeffrey Hubble, Superintendent, Greencastle Community  
School Corporation  
Emily Royer, Indiana Landmarks, Western Regional Office  
Beth K. McCord, INDNR-DHPA  
John Carr, INDNR-DHPA



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness,**  
**Commissioner**

April 23, 2020

This letter was sent to the listed parties.

RE: Dual Review Project:  
US 231 Road Rehabilitation Project  
Greencastle, Putnam County, Indiana  
Des. No. 1700121  
DHPA No. 23587

Dear Consulting Party,

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration (FHWA), proposes to proceed with US 231 Road Rehabilitation project, Des. No. 1700121.

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 March 4, 2019, inviting you to participate in Section 106 consultation. In addition, a letter distributed on July 16, 2019, notified consulting parties that a historic property report and archaeology report were available for review and comment.

The proposed undertaking is on US 231 and extends from SR 240 (Veterans Memorial Highway) north to approximately 35 feet north of Frazier Street in the City of Greencastle, Putnam County, Indiana. It is within Greencastle Township, Greencastle USGS Topographic Quadrangle, in Sections 16 & 21, Township 14 North, Range 4 West.

Note that the project limits have been revised since previous correspondence dated March 4, 2019, and July 16, 2019. The northern project limits have increased from 100 feet north of Shadowlawn Ave. to approximately 35 feet north of Frazier Street. This additional work is described below. The southern project limits have been reduced and the project now begins at SR 240 (Veterans Memorial Highway). Please see the enclosed maps showing the updated project area.

The primary need for the project is based on the deteriorated pavement structure and poor storm water drainage along the project route. Currently US 231 through Greencastle can be broken into northern and southern halves. The northern half includes the northern project terminus to Washington Street/Bloomington Street intersection (0.9 mile). The southern half includes the Washington Street/Bloomington Street intersection to the southern

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project terminus (0.9 mile). The pavement in the southern half of the project area (Bloomington Street) is experiencing fatigue-cracking in the wheel path and near the curb line, reflective-cracking from the underlying concrete and age-hardening of the asphalt surface material (Figure 1 and Figure 2). The northern half of the project area (Washington and Jackson streets) is experiencing severe pavement distresses due in part to an antiquated water line utility (Figure 3 and Figure 4). Furthermore, the existing storm water drainage system does not adequately convey storm water during heavy rain events, resulting in poor drainage with ponding. Thus, the engineering assessment has recorded the overall condition of US 231 in Greencastle as poor. An additional need for the project is that curb ramps do not meet current Americans with Disabilities Act (ADA) compliance standards.

The purpose for the project is to improve existing drainage issues and pavement conditions. An additional purpose is to improve curb ramps for accessibility. The project is anticipated to be let in 2022. At this time, right-of-way (ROW) amounts are anticipated to include approximately 1.5 acres of temporary and 0.2 acre of permanent right-of-way. Anticipated right-of-way amounts are likely to reduce as the project design progresses. Access to residences and businesses along US 231 will be continuously maintained during construction. See details about the anticipated maintenance of traffic on the following pages.

As previously referenced, some details regarding the scope of work have changed since the correspondence dated March 4, 2019, and July 16, 2019. Please see the following paragraphs and enclosed maps for more information.



**Figure 1: Looking east at the typical pavement condition and existing curb ramps along Bloomington Street and within the Eastern Enlargement Historic District.**



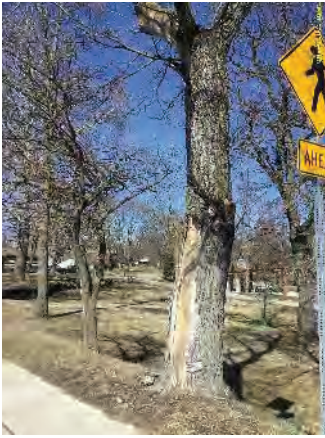
**Figure 2: Looking northwest at the typical pavement condition of Bloomington Street within the Eastern Enlargement Historic District.**



**Figure 3: Looking northwest at the typical pavement condition of Washington Street and improved sidewalks within the Courthouse Square Historic District.**



**Figure 4: Looking south at a typical view of the pavement condition on Jackson Street.**



**Figure 5: Looking northeast at damaged Elm tree and dead Ash tree in Robe Ann Park anticipated to be removed.**



**Figure 6: Looking north at Silver Maple tree in Robe Ann Park anticipated to be removed.**



**Figure 7: Looking east at two of the most mature street trees along Bloomington Street within the Eastern Enlargement Historic District.**

Currently it is anticipated that the southern half will receive a minor structural overlay: milled to a two (2)-inch depth and overlaid with four (4) inches of pavement. This will result in pavement that is two (2) inches above existing grade. Additional work will include: 1) Replacing the curb and gutters; 2) Replacing all curb ramps; 3) Regrading driveway approaches; 4) Removing/replacing up to three trees in Robe Ann Park (Figure 5 and Figure 6); and 5) Removing/replacing some trees in the grass buffer (lawn between back of curb and sidewalk) along Bloomington Street that would not likely survive curb replacement.

It does not appear that street trees were planted along Bloomington Street as a specific design feature within the Eastern Enlargement Historic District. Other than a few mature maple trees and a large sycamore tree (Figure 7), most of trees along Bloomington Street within the Eastern Enlargement Historic District appear to be ornamental species planted after the period of significance (1840-1961). Please see the enclosed plan sheets identifying tree species, size and whether replacement is currently anticipated.

Note that sidewalks north of Hanna Street to Washington Street are not anticipated to be replaced but are currently being evaluated as the project design progresses. They are currently shown on the plan sheets (enclosed) as “worst-case” if replacement is required. It is anticipated that the stone walls, concrete curbs, and concrete steps along the back of sidewalks will be avoided (Figure 9). Additionally, the concrete steps leading into Robe Ann Park and the dry-stacked stone retaining wall will be avoided (Figure 10). However, the contemporary



**Figure 9: Looking northwest across Bloomington Street at typical ornamental street trees within the Eastern Enlargement Historic District.**



**Figure 8: Looking south at an example of a concrete curb and stone retaining wall along the back of sidewalks within the Eastern Enlargement Historic District. Impacts to these features are not anticipated.**





**Figure 10: Looking northeast at stone retaining wall within Robe Ann Park to be avoided.**



**Figure 11: Looking northeast at contemporary concrete landing to be replaced in kind and concrete steps to be avoided.**

concrete landing on top of the steps will be replaced in kind (Figure 11).

Additionally along Bloomington Street, drainage structures will not be impacted except to adjust casting elevations. The stamped concrete at the US 231 and Anderson Street intersection will remain in place (Figure 12). Full depth pavement replacement will occur adjacent to this intersection to properly tie in pavement elevations.



**Figure 12: Looking northwest at stamped concrete at the Bloomington Street and Anderson Street intersection to remain in place.**

Currently, it is anticipated that the northern half of the project will replace the pavement in full depth, except for the increased project limits from 100 feet north of Shadowlawn Ave. to 35 feet north of Frazier St. The roadway footprint and elevation grade will be perpetuated. Associated work includes the following: 1) Replacing the curbs and gutters at current locations; 2) Replacing the storm sewer and installing new inlets; 3) Replacing all curb ramps that do not meet current ADA standards; 4) Replacing sidewalks adjacent to the back of curb; 5) Replacing and moving the water line to outside of the roadway and below the grass buffer or the sidewalk (the exact location to be determined later in design); and 6) Replacing trees in the grass buffer and sidewalk tree grates with the same species and variety.

At this time, it is anticipated that the project will involve the following work around the courthouse square (including crosswalks, sidewalks, and an ADA-compliant route with curb ramps to the courthouse): 1) Removing the crosswalks in the center of the block (west and south of the Putnam County Courthouse) (Figure 13); 2) Maintaining the wide curb near the courthouse along the inside edge of Jackson and Washington streets (Figure 14); 3) Removing the overhead sign structures



**Figure 13: Looking northeast at midblock crosswalk to the Putnam County Courthouse.**



**Figure 15: Looking northeast at the wide curb surrounding the Putnam County Courthouse. The curb and wall are anticipated to be maintained.**



**Figure 14: Looking northwest at the wide sidewalk, ornamental streetlights, and trees along the west side of Jackson Street within the Courthouse Square Historic District.**

west and south of the courthouse; 4) Supporting the ADA-compliant access to the courthouse in the middle of the Indiana Street block with an ADA-compliant crosswalk across Washington Street at the east side of Indiana Street; 5) Replacing the concrete sidewalks up to the commercial buildings along the west side of Jackson Street and the south side of Washington Street (Figure 15); 6) Replacing the concrete pavers with matching or similar pavers in the same locations; and 7) Replacing the trees within the sidewalk tree grates with the same species and variety. Finally, note that the ornamental lights and other landscape amenities such as benches, planters, and trash receptacles around the courthouse square and along Washington Street are anticipated to be salvaged and reset following construction or provided to the City for relocation.

In order to best maintain traffic and minimize potential temporary effects to historic resources, an access study should be performed and discussions with property owners should occur during the design phase to ensure that access to local businesses is maintained. Specialized signage should be incorporated into the maintenance of traffic plans to direct the travelling public to business access points. A Traffic Management Plan will also be developed to ensure that access for emergency services is provided during each phase of construction. An official state route detour will be signed for all through traffic to avoid the project area. Finally, the project will be phased and at least one lane of traffic will always be maintained in the north-bound direction. Any identified local detours will not be signed. In addition to maintenance of traffic for vehicles, a pedestrian maintenance of traffic plan will be developed during plan development.

The proposed alternative for the increased project limits from 100 feet north of Shadowlawn Ave. to 35 feet north of Frazier Street includes milling the existing pavement to a depth of 1.5 inches and overlay of 1.5 inches with some patching within the existing pavement limits. No curbs are present in this extended project area. Because of the minor scope of work involved the overlay in this section of increased project limits, the maintenance of traffic plan for this section will be performed by phased construction with a moving operation utilizing a flagger. Providing flagger control will allow a one-lane, two-way operation for this patching, milling, and overlay section. Please see the enclosed photographs and photo location map of this increased project limits area.

RQAW is under contract with INDOT to advance the environmental documentation for the referenced project. Cultural Resource Analysts, Inc. (CRA) has been subcontracted to complete the archaeology portion of 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 at the end of this letter. Parties that previously accepted invitation to participate in Section 106 consultation are identified in bold.

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>.

Please note that, per the permanent rule issued by the Indiana Department of Natural Resources effective August 14, 2013 (312 IAC 20-4-11.5), INDOT is requesting that this project be subjected to "dual review"; that is, reviewed by the Division of Historic Preservation and Archaeology simultaneously under 54 U.S.C. 306108 (Section 106) and IC 14-21-1-18 (Indiana Preservation and Archaeology Law dealing with alterations of historic sites and structures requiring a Certificate of Approval). Pursuant to Section 11.5(f) of this rule, at the conclusion of the review process we anticipate that the Division Director would issue a letter of clearance exempting this project from obtaining a Certificate of Approval under IC 14-21-1-18. Enclosed with this letter is a detailed list of the consulting parties with contact information, including email addresses, for processing the dual review submission. This request is now being made due to the potential changes in project scope which will increase the scope within National Register of Historic Places (NRHP)-listed historic districts

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 two (2) resources (Courthouse Square Historic District, NR-0656, and Eastern Enlargement Historic District, NR-2230) listed in the 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, Robe Ann Park (IHSSI #133-250-69053) is recommended as eligible for listing in the NRHP under Criterion A. For purposes of the Section 106 review of this project, the Indiana SHPO concurred with the NRHP-eligibility of Robe Ann Park in a letter dated August 14, 2019. Please see the Historic Property Report distributed in the correspondence dated July 16, 2019, for additional information, and the Indiana SHPO's letter in enclosed. Please also see the enclosed maps for the locations of all three historic resources within the APE.

With regard to archaeological resources, an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards identified no sites within the project area and no further work is recommended.

As a result of the project area extension (described above), the APE was extended to the north and surveyed by qualified professional historians on August 9, 2019. The historians did not identify any resources listed in or eligible for listing in the NRHP within the expanded APE. Please see results of this investigation in photos of the expanded APE enclosed at the end of this letter. With regard to archaeology, this portion of US 231 lies within a combined commercial and residential area, and the project boundaries are



**Figure 16: View inside stone drainage structure.**

limited to the existing pavement limits and small areas of visibly disturbed soils directly adjacent to the pavement. According to SHAARD, there are no archaeological sites within or adjacent to the project area extension. Therefore, additional investigations are not required for the extended project area.

Further coordination with the design engineers revealed a stone drainage structure within the APE (Figure 16). It is located within the Eastern Enlargement Historic District and below Washington Street approximately 90 feet east of Locust Street. Please see its location on the enclosed maps. The stone drainage structure is not visible from the street level and continues to convey storm water. It is believed that this structure continues to the northwest and southeast, but locations of other stone drainage structures in Greencastle are unknown. Because the structure is below ground and remains in use it is not considered an archaeological resource or an above-ground resource contributing to the Eastern Enlargement Historic District.

Following the early coordination letter, responses accepting to be consulting parties were received from the Greencastle Mayor Dory, Main Street Greencastle, Inc., the Miami Tribe of Oklahoma, and Indiana SHPO. The Executive Director of Main Street Greencastle, Inc. accepted consulting party status in an email dated March 8, 2019 and provided no comment regarding the project. The Miami Tribe of Oklahoma offered no objection to the project in a letter dated March 19, 2019. No official response from the Heritage Society accepting consulting party status was received but correspondence regarding contact information was received (enclosed). They will be informed of subsequent correspondence to maintain an opportunity to participate.

Mayor Dory wrote in his email dated March 4, 2019, that “A simple resurfacing project should not have an adverse impact on any historic resources as US 231 has been resurfaced several times over the years.” Furthermore, he noted that new sidewalks were installed between Bloomington Street and Vince Street as part of the Stellar Communities project. Note that it is intended that all aspects of the Stellar Communities project be replaced in-kind. Please see all previous correspondence enclosed at the end of this letter.

In a letter dated April 4, 2019, the Indiana SHPO staff recommended that the Greencastle Community Schools and DePauw University be invited to participate in Section 106 consultation “because of the potential for disruption of traffic to and from their facilities.” In the letter distributing the HPR to consulting parties on July 16, 2019, both Greencastle Community Schools and DePauw University were invited participate in Section 106 consultation. Responses from Greencastle Community Schools or DePauw University were not received. In that same letter dated April 4, 2019, the Indiana SHPO staff advised considering whether either the official detour or unofficial detours would likely send greatly increased traffic into areas where there might be historic buildings or districts and whether the APE boundaries should be adjusted to take the effects of that increased traffic into account.” Please see all previous correspondence enclosed at the end of this letter.

In response to the consulting party letter distributing the HPR on July 16, 2019, a letter was received from the Indiana SHPO on August 14, 2019. The Indiana SHPO staff concurred with the recommendations in the HPR that the Courthouse Square Historic District, Eastern Enragement Historic District, and Robe Ann Park are the only above-ground resources within the APE listed in or eligible for listing in the National Register of Historic Places. The Indiana SHPO staff also concurred with the archaeology report stating that, “we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places within the proposed project area.” In this letter, the Indiana SHPO staff generally concurred with the APE stating it “appears to be of adequate size to encompass the geographic area in which foreseeable effects of this project on historic properties could occur, based on where excavation and construction activities have been described generally to occur.” The Indiana SHPO staff again discussed the potential for the project detours to impact historic resources outside of the APE and stated, “establishing an APE for likely detour route might be in order. We would appreciate receiving feedback on whether consideration of effects of likely detours has

been taken into account.” Please see maintenance of traffic discussed on page 5 of this letter, and see all previous correspondence enclosed at the end of this letter.

During a visit to the Putnam County Museum on August 9, 2019, Kyle Boot, of RQAW, spoke with the Museum’s Executive Director, Lisa Mock, about the early coordination letter and the letter distributing the HPR. Ms. Mock verbally accepted continued participation in Section 106 consultation and offered no concerns about the project. No formal response accepting the consulting party invitation was received from the Museum. Please see all other consulting party correspondence enclosed at the end of this letter.

According to the early coordination letter dated March 4, 2019, if the project changes all previously invited consulting parties will be included in distribution of further information about the project. Due to the changes in the project since the previous correspondence, all previously invited consulting parties are included in this correspondence.

As the designers and engineers are developing this project, RQAW and INDOT, on behalf of FHWA, are inviting the consulting parties to a meeting to discuss the identified historic resources and the undertaking’s potential impacts to them. The meeting will take place on Monday May 11, 2020 at 1:30 PM Eastern Time in Greencastle, Indiana. The meeting location is:

Greencastle City Hall  
1 North Locust Street  
Greencastle, IN 46936

For those that cannot attend the meeting in person, a video conference may be available with a link to be emailed, and the following call-in information can be used to join the discussion:

Dial-in number: +1 317 643-7993  
Conference ID: 726 937 426#

We look forward to discussion and input from consulting parties regarding the improvements to US 231 through Greencastle. Comments can be made at the meeting and/or written comments provided. If you wish to provide written comments, please do so within two weeks after the meeting (COB, Monday May 25, 2020).

This letter and enclosures are available for review in IN SCOPE at <http://erns.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 within seven (7) days.

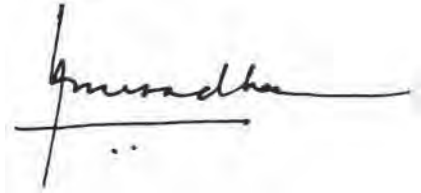
Please review the information at your earliest convenience. If you indicate that you do not desire to be a consulting party or if you have not previously accepted consulting party status and you do not respond to this letter, you will not be included on the list of consulting parties for this project and will not receive further information about the project unless the design changes. We hope to have your participation in the meeting on May 11, 2020. In preparation for the meeting discussion, additional information regarding potential impacts to historic resources will be distributed, and a video conference link will be provided to parties that RSVP ‘yes.’

To RSVP whether or not you will be attending the meeting, and for questions concerning specific project details, you may contact Kyle Boot of RQAW at 317-588-1762 or [kboot@rqaw.com](mailto:kboot@rqaw.com). All future responses regarding the proposed project should be forwarded to RQAW at the following address:

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, IN 46038  
kboot@rqaw.com.

Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

Enclosures:

Project graphics  
Consulting party correspondence

Removed to reduce the size of  
the 800.11 document.

Distribution List: (consulting parties that previously accepted invitation to participate in Section 106 consultation are in **bold**)

**John Carr and Beth McCord, for Indiana State Historic Preservation Officer (SHPO),**  
**JCarr@dnr.IN.gov; BMccord@dnr.in.gov**

Emily Royer, Indiana Landmarks, Western Regional Office, [eroyer@indianalandmarks.org](mailto:eroyer@indianalandmarks.org)

**Lisa Mock, Putnam County Museum Executive Director, [lmock@putnamcountymuseum.org](mailto:lmock@putnamcountymuseum.org)**

**Heritage Preservation Society of Putnam County, [mmkenton@yahoo.com](mailto:mmkenton@yahoo.com);**

**[susanvmurray5@gmail.com](mailto:susanvmurray5@gmail.com); [cross2972@yahoo.com](mailto:cross2972@yahoo.com)**

Larry Tippin, Putnam County Historian, [ltippin@tds.net](mailto:ltippin@tds.net)

Lorie L. Hallet, Putnam County Auditor, [loriehallettpcauditor@yahoo.com](mailto:loriehallettpcauditor@yahoo.com);  
[putnamco.auditor@gmail.com](mailto:putnamco.auditor@gmail.com)

Rick Woodall, Putnam County Commissioner (President), 307 Greenwood Ave. Greencastle, IN 46135

David Berry, Putnam County Commissioner, 6912 E St. Rd. 236, Roachdale, IN 46172

Donald Walton, Putnam County Commissioner, 8 N. Main Street, PO Box 114, Cloverdale, IN 46120

Michael Ricketts, Putnam County Highway Supervisor, [mike@pchwydept.com](mailto:mike@pchwydept.com)

**William A. Dory, Greencastle Mayor, [bdory@cityofgreencastle.com](mailto:bdory@cityofgreencastle.com)**

**Mike Richmond and Kristen Clary, Main Street Greencastle, Inc, [mike@infinitimarketing.co](mailto:mike@infinitimarketing.co);**  
**[kristin@gpcdc.com](mailto:kristin@gpcdc.com)**

Brad Phillips, Greencastle Superintendent, Dept. of Public Works, [bphillips@cityofgreencastle.com](mailto:bphillips@cityofgreencastle.com)

Adam Cohen, Common Council (City Council), [acohen@cityofgreencastle.com](mailto:acohen@cityofgreencastle.com)

Stacie Langdon, Common Council (City Council), [slangdon@cityofgreencastle.com](mailto:slangdon@cityofgreencastle.com)

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Steve Fields, Common Council (City Council), [sfields@cityofgreencastle.com](mailto:sfields@cityofgreencastle.com)  
Tyler Wade, Common Council (City Council), [twade@cityofgreencastle.com](mailto:twade@cityofgreencastle.com)  
Mark N. Hammer, Common Council (City Council), [mhammercpa@gmail.com](mailto:mhammercpa@gmail.com)  
Gary Lemon, Common Council (City Council), [glemon@cityofgreencastle.com](mailto:glemon@cityofgreencastle.com)  
Dave Murray, Common Council (City Council), [dmurray@collegecosts.com](mailto:dmurray@collegecosts.com)  
Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.,  
[rhinsenkamp@westcentralin.com](mailto:rhinsenkamp@westcentralin.com)  
Greencastle School Corporation, [jhubble@greencastle.k12.in.us](mailto:jhubble@greencastle.k12.in.us)  
DePauw University, [president@depauw.edu](mailto:president@depauw.edu)  
Greencastle Parks & Recreation Department, [rweinschenk@cityofgreencastle.com](mailto:rweinschenk@cityofgreencastle.com)  
Eastern Shawnee Tribe of Oklahoma  
Forest County Potawatomi Community  
**Miami Tribe of Oklahoma**  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indians

## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Thursday, April 23, 2020 8:22 AM  
**To:** 'Carr, John (JCarr@dnr.IN.gov)'; McCord, Beth K; Emily Royer; lmock@putnamcountymuseum.org; mmkenton@yahoo.com; susanvmurray5@gmail.com; Susan Price Gick; Itippin@tds.net; lorihallettpcauditor@yahoo.com; putnamco.auditor@gmail.com; mike@pchwydept.com; Bill Dory; Kristin Clary; mike@infinitymarketing.com; bphillips@cityofgreencastle.com; acohen@cityofgreencastle.com; slangdon@cityofgreencastle.com; sfields@cityofgreencastle.com; twade@cityofgreencastle.com; mhammercpa@gmail.com; glemon@cityofgreencastle.com; dmurray@collegcosts.com; rhinsenkamp@westcentralin.com; jhubble@greencastle.k12.in.us; president@depauw.edu; rweinschenk@cityofgreencastle.com  
**Cc:** Alexander, Kelyn; Branigin, Susan; Miller, Shaun (INDOT); Coon, Matthew; 'Kumar, Anuradha (akumar@indot.IN.gov)'; Lisa Casler; Walls, Steven; Bishop, Ann; 'Joseph Dabkowski (jdabkowski@RQAW.com)'; Aaron Lawson; Haylee Moscato  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231Greencastle\_Des1700121\_ConsultationLtr\_2020-04-23.pdf

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a consulting party letter with a meeting invitation has 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,  
Kyle Boot



**Kyle Boot**  
Architectural Historian  
8770 North St., Ste. 110  
Fishers, IN 46038  
O : 317.588.1762  
[www.rqaw.com](http://www.rqaw.com)



*Best Places to Work in Indiana, 2018-2020*  
*Indy Star's Top Workplaces, 2019*



## Kyle J. Boot

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**From:** Miller, Shaun (INDOT) <[smiller@indot.IN.gov](mailto:smiller@indot.IN.gov)>  
**Sent:** Thursday, April 23, 2020 8:27 AM  
**To:** Diane Hunter  
**Cc:** Kyle J. Boot; Alexander, Kelyn; Michelle (FHWA) Allen  
**Subject:** FW: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231Greencastle\_Des1700121\_ConsultationLtr\_2020-04-23.pdf

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

Dear Diane,

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Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,

Shaun Miller  
INDOT, Cultural Resources Office  
Archaeology Team Lead  
(317)233-6795

## Kyle J. Boot

---

**From:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Sent:** Thursday, April 23, 2020 9:11 AM  
**To:** Carmany-George, Karstin (FHWA); michael.laronge@fcpotawatomi-nsn.gov; thpo@estoo.net; Matthew.Bussler@pokagonband-nsn.gov; lpappenfort@peoriatribes.com  
**Cc:** Miller, Shaun (INDOT); Kumar, Anuradha; Branigin, Susan; Kyle J. Boot  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231Greencastle\_Des1700121\_ConsultationLtr\_2020-04-23.pdf

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a consulting party letter with a meeting invitation has 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,

**Kelyn Alexander**

*Historian*

*Cultural Resources Office*

*Environmental Services*

100 N. Senate Ave., Room N642

Indianapolis, IN 46204

**Office:** (317) 234-4147

**Email:** [kalexander3@indot.in.gov](mailto:kalexander3@indot.in.gov)

**\*\* Historic Property Report (HPR) guidelines can be found [here](#)**

## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Friday, May 1, 2020 7:32 AM  
**To:** Emily Eckardt  
**Cc:** Alexander, Kelyn  
**Subject:** RE: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

Hi Emily,

Thank you for your response and comment that you do not believe the historic properties in the APE will be negatively affected by the proposal. We will include this response in the environmental document and note that Indiana Landmarks will not receive subsequent correspondence unless the project changes.

We appreciate Indiana Landmark's involvement in Section 106.

Thanks again,  
Kyle

**Kyle Boot**  
Architectural Historian  
O : 317.588.1762  
[www.rqaw.com](http://www.rqaw.com)

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**From:** Emily Eckardt <eeckardt@indianalandmarks.org>  
**Sent:** Thursday, April 30, 2020 2:13 PM  
**To:** Kyle J. Boot <KBoot@RQAW.com>  
**Subject:** Re: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

Kyle,

Thank you for providing me with information regarding the proposed US 231 road rehabilitation project in Putnam County. I appreciate your consideration in involving our organization in the review of this expanded project. After surveying the project and the changes since the March 2019 Early Coordination Letter, I do not believe the historic properties in the APE will be negatively affected by the proposal. Indiana Landmarks does not need to serve as a consulting party.

If you have any questions or if you make changes to the current project, please notify my office.

Best,  
Emily

**Subject:** Consulting Party Meeting – US 231 Greencastle (Des. 1700121)  
**Location:** Microsoft Teams Meeting

**Start:** Mon 5/11/2020 1:30 PM  
**End:** Mon 5/11/2020 3:30 PM

**Recurrence:** (none)

**Meeting Status:** Accepted

**Organizer:** Joseph Dabkowski  
**Required Attendees:** Joseph Dabkowski; Kyle J. Boot  
**Optional Attendees:** JCarr@dnr.IN.gov; BMccord@dnr.IN.gov; eroyer@indianalandmarks.org; lmock@putnamcountymuseum.org; mmkenton@yahoo.com; susanvmurray5@gmail.com; cross2972@yahoo.com; ltippin@tds.net; loriehallettpcauditor@yahoo.com; putnamco.auditor@gmail.com; mike@pchwydept.com; bdory@cityofgreencastle.com; kristin@gpcpcdc.com; mike@infinitemarketing.co; bphillips@cityofgreencastle.com; acohen@cityofgreencastle.com; slangdon@cityofgreencastle.com; sfields@cityofgreencastle.com; twade@cityofgreencastle.com; mhammercpa@gmail.com; glemon@cityofgreencastle.com; dmurray@collegecosts.com; rhinsenkamp@westcentralin.com; jhubble@greencastle.k12.in.us; president@depauw.edu; rweinschenk@cityofgreencastle.com; KAlexander3@indot.IN.gov; Lisa Casler; Walls, Steven; ABishop@indot.IN.gov; Haylee Moscato; k.carmanygeorge@dot.gov; SBranigin@indot.IN.gov; smiller@indot.in.gov; mcoon@indot.in.gov; akumar@indot.IN.gov; Ryan Keller; Madison Story; Michelle.allen@dot.gov

**OnlineMeetingConfLink:** [conf:sip;jdabkowski@RQAW.com;gruu;opaque=app:conf:focus:id:teams:2:0!19:meeting\\_MGJiMGIwMTUtYWU1ZS00OWNkLTIhZDQtZWUzMDI5ZGYzMjgx-thread.v2!0ee8fbff-b2974bef971aee613bd03def!56e7165c41694e6896c025c600451ffc](https://teams.microsoft.com/jdabkowski@RQAW.com;gruu;opaque=app:conf:focus:id:teams:2:0!19:meeting_MGJiMGIwMTUtYWU1ZS00OWNkLTIhZDQtZWUzMDI5ZGYzMjgx-thread.v2!0ee8fbff-b2974bef971aee613bd03def!56e7165c41694e6896c025c600451ffc)

**SchedulingServiceMeetingOptionsUrl:** [https://teams.microsoft.com/meetingOptions/?organizerId=0ee8fbff-b297-4bef-971a-ee613bd03def&tenantId=56e7165c-4169-4e68-96c0-25c600451ffc&threadId=19\\_meeting\\_MGJiMGIwMTUtYWU1ZS00OWNkLTIhZDQtZWUzMDI5ZGYzMjgx@thread.v2&messageId=0&language=en-US](https://teams.microsoft.com/meetingOptions/?organizerId=0ee8fbff-b297-4bef-971a-ee613bd03def&tenantId=56e7165c-4169-4e68-96c0-25c600451ffc&threadId=19_meeting_MGJiMGIwMTUtYWU1ZS00OWNkLTIhZDQtZWUzMDI5ZGYzMjgx@thread.v2&messageId=0&language=en-US)

**SchedulingServiceUpdateUrl:** [https://scheduler.teams.microsoft.com/teams/56e7165c-4169-4e68-96c0-25c600451ffc/0ee8fbff-b297-4bef-971a-ee613bd03def/19\\_meeting\\_MGJiMGIwMTUtYWU1ZS00OWNkLTIhZDQtZWUzMDI5ZGYzMjgx@thread.v2/0](https://scheduler.teams.microsoft.com/teams/56e7165c-4169-4e68-96c0-25c600451ffc/0ee8fbff-b297-4bef-971a-ee613bd03def/19_meeting_MGJiMGIwMTUtYWU1ZS00OWNkLTIhZDQtZWUzMDI5ZGYzMjgx@thread.v2/0)

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Dear Consulting Party,

Due to the COVID-19 pandemic, the above-referenced consulting party meeting will be held virtually instead of at the Greencastle City Hall. The meeting will take place on Monday, May 11, 2020 at 1:30 PM. Please use the below Microsoft Teams link to participate in the meeting online with video option or call the below phone number and conference ID to join via conference call.

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## [Join Microsoft Teams Meeting](#)

+1 317-643-7993 United States, Indianapolis (Toll)

Conference ID: 726 937 426#

[Local numbers](#) | [Reset PIN](#) | [Learn more about Teams](#) | [Meeting options](#)

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Thank you,  
Kyle



**Kyle Boot**  
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8770 North St., Ste. 110  
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O: 317.588.1762  
C: 317-410-0845  
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*Best Places to Work in Indiana, 2018-2020*  
*Indy Star's Top Workplaces, 2019*

## Haylee Moscato

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**From:** Kyle J. Boot  
**Sent:** Friday, May 8, 2020 10:15 AM  
**To:** 'Carr, John (JCarr@dnr.IN.gov)'; BMccord@dnr.IN.gov; lmock@putnamcountymuseum.org; bdory@cityofgreencastle.com; Alexander, Kelyn; Lisa Casler; Walls, Steven; ABishop@indot.IN.gov; rkeller@westcentralin.com; Joseph Dabkowski  
**Cc:** k.carmanygeorge@dot.gov; Haylee Moscato  
**Subject:** Consulting Party Meeting Agenda and Plans – US 231 Greencastle (Des. 1700121)  
**Attachments:** US231Greencastle\_Des1700121\_Agenda\_2020-05-11.pdf; US231Greencastle\_Des1700121\_PlanSet\_2020-05-11.pdf

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

Dear Consulting Party,

We look forward to your participation in the online meeting on Monday (5/11/2020) at 1:30 pm. In preparation, please find the agenda and a Preliminary Field Check (PFC) plan set attached to this email. Please note that the plan set is preliminary worst-case and for this Section 106 coordination, not to be shared at this time.

Additionally note that the individuals who have already accepted the meeting invitation at this time are identified in the *To:* above. Please don't hesitate to let me know if you have any questions.

Thanks in advance for your participation,  
Kyle

**RQAW** | **Kyle Boot**  
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**ENVIRONMENTAL**



*Best Places to Work in Indiana, 2018-2020*  
*Indy Star's Top Workplaces, 2019*



**Fishers, IN - Corporate**  
8770 North St., Ste 110  
Fishers, IN 46038  
317.588.1798

**Consulting Party Meeting Agenda**  
Video Conference Call  
Monday, May 11, 2020, 1:30 p.m. EST

**US 231 Road Rehabilitation**  
INDOT Designation Number 1700121  
DHPA Number 23587

- I. **Welcome and Introductions**
- II. **Section 106 Consultation and Purpose of the Meeting**
- III. **Proposed Project Description**
- IV. **Historic Properties in Area of Potential Effect (APE)**
  - a. Courthouse Square Historic District
  - b. Eastern Enlargement Historic District
  - c. Robe Ann Park
- V. **Potential effects to Historic Properties Discussion**
- VI. **Next Steps**



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 234-5168

**Eric Holcomb, Governor**  
**Joe McGuinness,**  
**Commissioner**

May 20, 2020

This letter was sent to the listed parties.

RE: Dual Review Project:  
US 231 Road Rehabilitation Project  
Greencastle, Putnam County, Indiana  
Des. No. 1700121  
DHPA No. 23587

Dear Consulting Party,

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration (FHWA), proposes to proceed with US 231 Road Rehabilitation project, Des. No. 1700121.

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 March 4, 2019, inviting you to participate in Section 106 consultation. A letter distributed on July 16, 2019, notified consulting parties that a historic property report and archaeology report were available for review and comment. Additionally, a letter distributed on April 23, 2020, notified consulting parties of revised project limits and invited consulting parties to participate in a meeting on May 11, 2020, to discuss the undertaking and potential impacts to historic resources.

The proposed undertaking is on US 231 and extends from SR 240 (Veterans Memorial Highway) north to approximately 35 feet north of Frazier Street in the City of Greencastle, Putnam County, Indiana. It is within Greencastle Township, Greencastle USGS Topographic Quadrangle, in Sections 16 & 21, Township 14 North, Range 4 West. Please see the April 23, 2020 letter and enclosures for a description of the undertaking's purpose, need, and project description.

RQAW is under contract with INDOT to advance the environmental documentation for the referenced project. Cultural Resource Analysts, Inc. (CRA) has been subcontracted to complete the archaeology portion of 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 are identified in the attached list at the end of this letter. Parties that previously accepted invitation to participate in Section 106 consultation are identified in bold.

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>.

This letter provides additional information following the Consulting Party Meeting on May 11, 2020 and distributes the minutes from that meeting to consulting parties. Please find the meeting minutes enclosed with this letter and the additional information as follows.

It was noted in INDOT's April 23, 2020 letter that a stone drainage structure was identified within the Eastern Enlargement Historic District (below Washington Street, east of Locust Street). This structure was discussed during the Consulting Party Meeting and additional research conducted following the meeting. RQAW researched historic maps (including Sanborn fire insurance maps), city and county histories, and newspaper articles. The Sanborn maps (1892, 1898, 1907, 1913) do not indicate any such stone drainage structures in Greencastle. Articles in the *Greencastle Herald*, the *Greencastle Banner*, the Eastern Enlargement Historic District National Register Nomination, and the City's website indicate construction of sanitary sewers during the first quarter of the 20<sup>th</sup> century, but little was found regarding storm sewer or drains. However, an article in the *Greencastle Banner* on July 7, 1887 (page 4), notified the public that proposals were being received "for the construction of a sewer from the east side of Locust street, in the city of Greencastle . . ." (Figure 1). It is inconclusive whether the stone drainage structure within the Eastern Enlargement Historic District is the same that proposals were accepted for in 1887, but it indicates such structures were being constructed in Greencastle during the late nineteenth century and during the Eastern Enlargement Historic District's period of significance, beginning in 1840. Furthermore, a *Greencastle Banner* article from 1899 mentions that a "sewer gutter is being put in on Locust Street between Anderson and Seminary," which suggests that the gutter will likely connect to an existing storm drainage system.

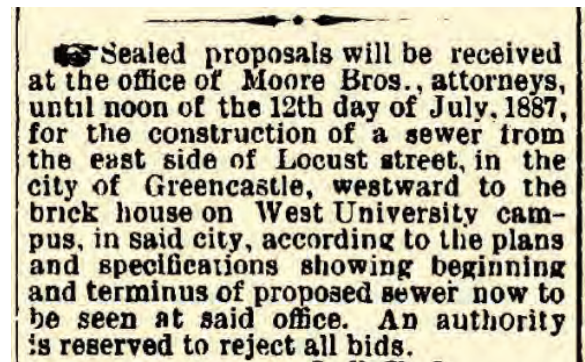


Figure 1: *Greencastle Banner*, page 4, July 7, 1887.

During the Consulting Party Meeting, Mr. John Carr of the Indiana Division of Historic Preservation and Archaeology commented on stone drainage structures in Madison and Aurora, Indiana, that are resources considered contributing to historic districts. The structure in Madison is an open gutter that is visible from street-level while the structure in Aurora is similar to the structure in the Eastern Enlargement Historic District but with a limestone cap that also serves as a sidewalk and is visible from street-level. INDOT suggests that since the subject stone drainage structure is not visible from street-level, it is more comparable to brick pavers or cisterns below modern road pavement in terms for Section 106 evaluations and analysis.

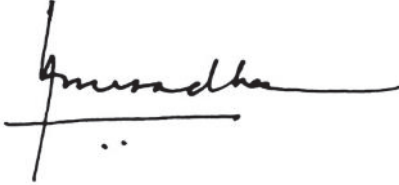
This letter and consulting party meeting minutes are available for review in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/> (the Des. No. is the most efficient search term, once in IN SCOPE). You are invited to review these documents and to respond with comments on any historic resource 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 immediately.

Please review the information and comment by COB Tuesday, May 26, 2020. For questions concerning specific project details, you may contact Kyle Boot of RQAW at 317-588-1762 or [kboot@rqaw.com](mailto:kboot@rqaw.com). All future responses regarding the proposed project should be forwarded to RQAW at the following address:

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, IN 46038  
[kboot@rqaw.com](mailto:kboot@rqaw.com).

Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Sincerely,



Anuradha V. Kumar, Manager  
Cultural Resources Office  
Environmental Services

Enclosure:

Consulting party (May 11, 2020) meeting minutes

Distribution List: (consulting parties that previously accepted invitation to participate in Section 106 consultation are in **bold**)

**John Carr and Beth McCord, for Indiana State Historic Preservation Officer (SHPO),**  
**JCarr@dnr.IN.gov; BMccord@dnr.in.gov**

Emily Royer, Indiana Landmarks, Western Regional Office, [eroyer@indianalandmarks.org](mailto:eroyer@indianalandmarks.org)

**Lisa Mock, Putnam County Museum Executive Director, [lmock@putnamcountymuseum.org](mailto:lmock@putnamcountymuseum.org)**

**Heritage Preservation Society of Putnam County, [mmkenton@yahoo.com](mailto:mmkenton@yahoo.com);**

**[susanvmurray5@gmail.com](mailto:susanvmurray5@gmail.com); [cross2972@yahoo.com](mailto:cross2972@yahoo.com); [phillipgick@hotmail.com](mailto:phillipgick@hotmail.com)**

Larry Tippin, Putnam County Historian, [ltippin@tds.net](mailto:ltippin@tds.net)

Lorie L. Hallet, Putnam County Auditor, [loriehallettpcauditor@yahoo.com](mailto:loriehallettpcauditor@yahoo.com);  
[putnamco.auditor@gmail.com](mailto:putnamco.auditor@gmail.com)

Rick Woodall, Putnam County Commissioner (President), 307 Greenwood Ave. Greencastle, IN 46135

David Berry, Putnam County Commissioner, 6912 E St. Rd. 236, Roachdale, IN 46172

Donald Walton, Putnam County Commissioner, 8 N. Main Street, PO Box 114, Cloverdale, IN 46120

Michael Ricketts, Putnam County Highway Supervisor, [mike@pchwydept.com](mailto:mike@pchwydept.com)

**William A. Dory, Greencastle Mayor, [bdory@cityofgreencastle.com](mailto:bdory@cityofgreencastle.com)**

**Mike Richmond and Kristen Clary, Main Street Greencastle, Inc, [mike@infinitimarketing.co](mailto:mike@infinitimarketing.co);  
[kristin@gcpcdc.com](mailto:kristin@gcpcdc.com)**

Brad Phillips, Greencastle Superintendent, Dept. of Public Works, [bphillips@cityofgreencastle.com](mailto:bphillips@cityofgreencastle.com)

Adam Cohen, Common Council (City Council), [acohen@cityofgreencastle.com](mailto:acohen@cityofgreencastle.com)

Stacie Langdon, Common Council (City Council), [slangdon@cityofgreencastle.com](mailto:slangdon@cityofgreencastle.com)

Steve Fields, Common Council (City Council), [sfields@cityofgreencastle.com](mailto:sfields@cityofgreencastle.com)

Tyler Wade, Common Council (City Council), [twade@cityofgreencastle.com](mailto:twade@cityofgreencastle.com)

Mark N. Hammer, Common Council (City Council), [mhammercpa@gmail.com](mailto:mhammercpa@gmail.com)

Gary Lemon, Common Council (City Council), [glemon@cityofgreencastle.com](mailto:glemon@cityofgreencastle.com)

Dave Murray, Common Council (City Council), [dmurray@collegecosts.com](mailto:dmurray@collegecosts.com)

Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.,  
[rhinsenkamp@westcentralin.com](mailto:rhinsenkamp@westcentralin.com)

Greencastle School Corporation, [jhubble@greencastle.k12.in.us](mailto:jhubble@greencastle.k12.in.us)

DePauw University, [president@depauw.edu](mailto:president@depauw.edu)

Greencastle Parks & Recreation Department, [rweinschenk@cityofgreencastle.com](mailto:rweinschenk@cityofgreencastle.com)

Eastern Shawnee Tribe of Oklahoma

Forest County Potawatomi Community

**Miami Tribe of Oklahoma**

Peoria Tribe of Indians of Oklahoma

Pokagon Band of Potawatomi Indians

## Consulting Party Meeting Minutes

Re: US 231 Rehabilitation Project  
 Greencastle, Putnam County, Indiana  
 Des. No.: 1700121, DHPA No.: 23587

A virtual meeting was held at 1:30 p.m. on Monday, May 11, 2020 via Microsoft Teams. Kyle Boot of RQAW facilitated the meeting from their office in Fishers, Indiana.

Those in attendance were as follows:

<b>Name</b>	<b>Representing</b>
Ann Bishop	Indiana Department of Transportation (INDOT)
Kari Carmony-George	Federal Highway Administration (FHWA)
Mayor Bill Dory	City of Greencastle
Michael Ricketts	Putnam County Highway
Susan Gick	Heritage Preservation Society of Putnam County
Mike Richmond	Greencastle Main Street, Inc.
Kelyn Alexander	INDOT Cultural Resources
Anuradha Kumar	INDOT Cultural Resources
Beth McCord	Indiana DNR, Division of Historic Preservation and Archaeology (DHPA)
John Carr	Indiana DNR, Division of Historic Preservation and Archaeology (DHPA)
Lisa Casler	RQAW
Joe Dabkowski	RQAW
Kyle Boot	RQAW
Madison Story	RQAW

The following was discussed:

### Project Overview

1. Welcome
  - a. RQAW welcomed everyone, introduced the project, and participants introduced themselves
2. Section 106 and Purpose of the Meeting
  - a. RQAW shared the meeting agenda and explained the Section 106 process.
  - a. Main purpose of meeting was to discuss historic properties and potential effects of the project on those properties. INDOT is currently looking at a "No Adverse Effect" finding.



3. Proposed Project Description

- a. RQAW presented maps of the project area and explained the project extents along US 231 from SR 240 (Veterans Memorial Highway) to Frazier Street. The project will take place on streets locally known as Bloomington, Washington, and Jackson. Generally, the project area can be divided into two areas – northern (Jackson and Washington Streets) and southern (Bloomington Street).
- b. Purpose & Need
  - i. Need: deteriorated pavement structure and poor storm water drainage
    1. South half has fatigue cracking the wheel path and near curb line, reflective cracking in the underlying concrete and age hardening in the asphalt surface material
    2. North half has severe pavement distress due in part to an antiquated water line and storm water drainage does not adequately convey storm water during heavy rain events, resulting in ponding
    3. The overall condition is rated poor
    4. Additionally, curb ramps do not meet current ADA standards
  - ii. Purpose: address pavement and drainage issues and to provide ADA-compliant curb ramps
- c. Generally, the project includes road rehabilitation
  - i. South half: minor structural overlay
    1. Mill 2" and overlay with 4" of pavement = 2" higher grade
    2. Additional work includes replacing curb and gutters, curb ramps, drive approaches, and some trees in the grass buffer
    3. Drainage structures will not be impacted (other than to adjust castings elevations)
    4. Stamped concrete section at Anderson Street will be avoided and remain in place. Full-depth pavement reconstruction will occur adjacent to this intersection to avoid the stamped concrete.
  - ii. Northern half: full-depth reconstruction, except additional northern limits which will receive a mill and resurface of 1.5" of pavement
    1. Existing roadway width and grade will be replaced to the same width and elevation. Additional work includes:
      - a. Replace curb and gutters
      - b. Replace storm sewer and installing new inlets
      - c. Replace curb ramps that do not meet current ADA standards
      - d. Replace sidewalks adjacent to back of curb
      - e. Replace and move water line to outside of roadway

- f. Replace trees in grass buffer and sidewalk tree grates with same species and variety
  - d. Maintenance of Traffic
    - i. RQAW explained the state detour route for all through traffic to avoid the project area during construction. This will utilize SR 240 and SR 71 north to US 36.
    - ii. RQAW explained that maintenance of traffic was discussed during the Preliminary Field Check held in the morning (May 11, 2020). It is anticipated to keep one lane of northbound traffic open during a phased construction while diverting southbound traffic to Jackson Street along the west side of Greencastle.
    - iii. Access to businesses will be maintained and signage incorporated to direct public to business access points. Additionally, a traffic management plan will be developed for emergency services during each phase of the construction.
- 4. Historic Properties in Area of Potential Effects (APE)
  - a. RQAW explained the APE as drawn in the HPR
  - b. Mr. Carr inquired about expanding the APE to incorporate potential impacts to historic resources due to an increase in traffic, particularly truck traffic, utilizing unofficial local detours.
    - i. A discussion was held pointing out that unofficial local detours cannot be determined. However, Mayor Dory discussed that a local ordinance designates Jackson Street as a truck route and local industries split the bulk of the north/south truck traffic between Bloomington and Jackson Streets. Jackson Street is east of the historic resources but running through the current DePauw University campus.
    - ii. The Walmart distribution center has several hundred trucks traveling through Greencastle daily.
    - iii. The Veterans Memorial Highway and Jackson Street should handle the southbound traffic and majority of the local truck traffic.
    - iv. INDOT, Mayor Dory, and RQAW will further discuss local detours and agreed to maintain access to businesses and minimize any increase to traffic, particularly truck traffic, through historic districts during construction.
- 5. Historic resources identified in APE:
  - a. Greencastle Commercial Historic District – RQAW explained its significance for the collection of fine buildings from early eras that portray the growth and development of Greencastle. It was listed in 1984 under Criteria A and C, contains 2 to 3-story buildings constructed between 1870 and 1939 in popular styles, National Register listing identified a total of 76 contributing and 4 non-contributing structures.

- b. Eastern Enlargement Historic District – RQAW explained its significance for its architectural evolutionary progression during the 20<sup>th</sup> century. The architectural integrity remains high. Listed in 2011 under Criteria A and C, it is a large residential district included 272 contributing and 23 non-contributing resources in the NR listing
    - i. Note that the National Register listing does not explicitly mention trees or landscape features as elements of design or significant to the district
  - c. Robe Ann Park – HPR determined eligible for the National Register. Significant as an excellent example of 20<sup>th</sup> century community park continuously used since 1928. Features WPA improvements and includes c. 1840s reconstructed cabin and c. 1860 caretakers Greek Revival-style house
6. Potential effects to Historic Properties
- a. RQAW explained criteria of “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.
  - b. RQAW suggested asking: “Will the impacts demonstrably diminish the integrity of any characteristics of the property that make it significant?”
  - c. **Robe Ann Park** - potential effects to Robe Ann Park were discussed and displayed through Google Earth Streetview screen sharing by RQAW.
    - i. RQAW explained the existing sidewalk is very narrow and the existing right-of-way is approximately 2 or 3 feet behind the back of sidewalk.
    - ii. Anticipated work within and adjacent to Robe Ann Park includes:
      - 1. Pavement mill and overlay with curb replacement
      - 2. Widen the sidewalk to the ADA standards
      - 3. Replace curb ramps at park entrance
      - 4. Remove three trees: a mature elm in poor condition, a small ash with 75% dead, and a mature Silver Maple in good condition
      - 5. Replace the contemporary concrete landing on top of the WPA concrete steps. Steps will be avoided
    - iii. Mayor Dory expressed the existing sidewalk is very narrow and should be widened, especially along the park for pedestrian access.
    - iv. Ms. Alexander identified that no retaining wall would be necessary and that all grading activities for the wider sidewalk would be within temporary right-of-way and not impact the stone retaining walls or other WPA features.
    - v. Mr. Carr and RQAW discussed resetting the stone steps in front of the caretaker’s house further back and possible flipping or patching them.

- vi. The tree removal was discussed. The park has good tree canopy, especially in the west half near the project area. Removing three trees, a couple in poor condition, would not likely diminish the integrity of the park.
- vii. The curb ramps at the park entrance were discussed and RQAW confirmed that no permanent right-of-way would be needed. Only temporary right-of-way will be used. The stone columns at the park entrance would also be avoided.
- viii. There appeared to be consensus of "No Adverse Effect" to Robe Ann Park
- d. **Eastern Enlargement Historic District** - potential effects to Eastern Enlargement Historic District were discussed and displayed through Google Earth Streetview screen sharing by RQAW.
  - i. Anticipated work along Bloomington street includes:
    1. Pavement mill and overlay resulting in net increase of 2" in grade elevation
    2. Curb and curb ramp replacement
    3. Stamped concrete at the Anderson Street intersection will be avoided
    4. The plans show worst-case scenario of sidewalk replacement, but sidewalk replacement is not anticipated due to the increased potential for an "adverse effect" to the Eastern Enlargement Historic District because of the additional tree removal.
      - a. The potential tree removal involved with curb ramp replacement (i.e. no sidewalk replacement) is indicated in the plans distributed in INDOT's letter dated April 23, 2020.
      - b. RQAW identified that most of the street trees along Bloomington Street are smaller ornamental varieties likely planted after the period of significance and only a few mature maple and sycamore trees are located along Bloomington Street within the district.
      - c. RQAW explained that the district is fairly covered with a tree canopy so the removal of some trees along Washington Street would not significantly impact the district's integrity.
      - d. Ms. Alexander reiterated that no sidewalk replacement would involve removing a few trees, but total sidewalk replacement would remove most if not all the street trees ("a significant number") along Bloomington Street.
      - e. Mayor Dory asked about INDOT replacing portions of the sidewalks that are in poor condition as part of this project.
        - i. Ms. Bishop and Ms. Casler will discuss, but not likely to perform sidewalk replacement if it involved additional tree removal within the historic district.



- f. Mr. Carr commented that the period of significance may not necessarily end at 1961 (50 years prior to the National Register listing) so some of the younger trees may be contributing.
    - g. Mr. Carr will continue looking at the tree situation and if removing the trees along Bloomington Street would be an "adverse effect". He alluded to minimizing impacts to curb ramps and minimizing tree removal should be a "no adverse effect."
  - 5. The stone and concrete walls, curbs, and steps behind the back of sidewalk would be avoided.
  - 6. Potential impacts to concrete steps and drive approaches (including the brick drive adjacent to the Elisha Braman House) will be avoided or minimized by not replacing sidewalks.
  - 7. The concrete steps and limestone sidewalk leading to the Elisha Braman house in the southeast quadrant of the Bloomington and Washington Street intersection was discussed. RQAW confirmed on the plans that only the bottom concrete step would be replaced in-kind. The limestone sidewalk on top will be avoided.
- ii. Anticipated work along Washington Street includes:
  - 1. Full-depth pavement replacement maintaining current width and bumpouts.
  - 2. Curb, curb ramp, and drive approach replacement
  - 3. Replacing the storm sewer and moving the water line out of the roadway to below the sidewalk or grass buffer area.
  - 4. Replacing trees with same varieties
- iii. Mr. Carr indicated that he is still pondering whether the stone drainage structure identified below Washington Street, east of Locust Street, contributes or not to the Eastern Enlargement Historic District and asked if it would be impacted by full-depth reconstruction.
  - 1. RQAW believed that it was not mentioned in the National Register nomination and suspects that it is an early stone structure not likely to be explicitly associated with the district.
  - 2. Ms. Casler explained that the pavement design is under development and impacts to the structure will be determined. It is likely that the inlets would be capped, and the new storm sewer would run below the eastbound traffic lane
  - 3. Mr. Carr explained that more visible limestone structures in Madison and Aurora, Indiana are considered contributing resources.

4. Ms. Alexander explained the CRO's belief that the stone structure does not contribute to the Historic District similarly to the way historic brick pavers beneath modern asphalt roadways do not contribute to historic districts.
  5. Mayor Dory was unsure about the history of this structure.
- e. **Greencastle Commercial Historic District** - potential effects to Greencastle Commercial Historic District were discussed and displayed through Google Earth Streetview screen sharing by RQAW.
- i. The work on Washington Street would be the same as the work on Washington Street within the Eastern Enlargement Historic District
  - ii. Work around the courthouse square would include:
    1. Removing the center block crosswalks
      - a. It was discussed during the Preliminary Field Check (morning of May 11, 2020) that the large overhead sign structures may remain.
    2. Maintaining the wide curb along the inside of the courthouse square
    3. Supporting ADA-compliant access to the courthouse from Indiana Street with crosswalks at Indiana Street and Washington Street
    4. Replacing the sidewalks up to the commercial buildings and replacing the concrete pavers to match
    5. The trees within the sidewalk grates would be replaced to match while site amenities would be salvaged and reset following construction: ornamental lights, benches, planters, trash receptacles, etc.
  - iii. Mayor Dory explained that the existing right-of-way goes up to the front of buildings and no right-of-way would need to be purchased for sidewalk reconstruction
  - iv. There was no discussion of potential effects and there appeared to be consensus of "No Adverse Effect" to the Greencastle Commercial Historic District

#### 7. Next Steps

- a. Any additional comments in response to the April 23, 2020 letter or the consulting party meeting are due by May 26, 2020.
- b. Mr. Carr and RQAW discussed the Division of Historic Preservation and Archaeology's dual review process following INDOT's request in their April 23, 2020 letter. The dual review was not initially requested during early coordination because the original project scope had less potential for negative impacts to historic resources. The request was made with the increased scope which possibly included sidewalk replacement within the Eastern Enlargement Historic District along Bloomington Street. Mr. Carr explained that a Director's Letter of Clearance would be issued with a "No Adverse Effect" finding, but interested parties need to be provided an opportunity review and/or request the State Historic Preservation Review Board



review the project. Mr. Carr requested that INDOT provide an additional 30-days for interested parties to review the project after the SHPO's next response.

- i. INDOT-CRO agreed to provide the additional 30-day comment period provided the schedule allowed.
- c. RQAW explained that the official finding will be documented in the 800.11(e) Section 106 Effect Finding documentation. This documentation will be provided to consulting parties and available to the public for comment.
- d. Project development will proceed concurrently with Section 106 and followed by NEPA documentation.

The meeting adjourned at approximately 3:30 p.m.

Action Items:

- INDOT, Mayor Dory, and RQAW to discuss local detours.
- INDOT and RQAW to discuss extent of sidewalk reconstruction along Bloomington Street.
- The Indiana SHPO will provide a response letter by May 26, 2020 and interested parties, contacted for the dual-review, will be given an additional 30-days to comment.

If there are any errors or omissions to these minutes, please contact Kyle Boot at RQAW.

Sincerely,

A handwritten signature in black ink that reads 'Kyle S. Boot'. The signature is written in a cursive style with a long horizontal line extending from the end.

Kyle Boot  
RQAW

## Kyle J. Boot

---

**From:** Kyle J. Boot  
**Sent:** Wednesday, May 20, 2020 9:59 AM  
**To:** 'Carr, John (JCarr@dnr.IN.gov)'; BMccord@dnr.IN.gov; eroyer@indianalandmarks.org; lmock@putnamcountymuseum.org; mmkenton@yahoo.com; susanvmurray5@gmail.com; cross2972@yahoo.com; Phillip Gick; ltippin@tds.net; loriehalletpcauditor@yahoo.com; putnamco.auditor@gmail.com; mike@pchwydept.com; bdory@cityofgreencastle.com; mike@infinitimarketing.co; kristin@gcpcdc.com; bphillips@cityofgreencastle.com; acohen@cityofgreencastle.com; slangdon@cityofgreencastle.com; sfields@cityofgreencastle.com; twade@cityofgreencastle.com; mhammercpa@gmail.com; glemon@cityofgreencastle.com; dmurray@collegcosts.com; rhinsenkamp@westcentralin.com; jhubble@greencastle.k12.in.us; president@depauw.edu; rweinschenk@cityofgreencastle.com  
**Cc:** ABishop@indot.IN.gov; Alexander, Kelyn; Branigin, Susan; 'Kumar, Anuradha (akumar@indot.IN.gov)'; Shaun Miller (smiller@indot.IN.gov); k.carmanygeorge@dot.gov; Lisa Casler; 'Joseph Dabkowski (jdabkowski@RQAW.com)'; Haylee Moscato; Madison Story; Walls, Steven; 'Coon, Matthew (mcoon@indot.IN.gov)'; Aaron Lawson  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231Greencastle\_Des1700121\_CPMtgAddInfoLtrAndMnts\_2020-05-20.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a consulting party meeting was held on May 11, 2020. Meeting minutes have been prepared and are ready for review and comment by consulting parties.

Please review a distribution letter and the minutes 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 immediately.

Consulting parties have until COB May 26, 2020 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](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,  
Kyle Boot

## Kyle J. Boot

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**From:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Sent:** Wednesday, May 20, 2020 10:07 AM  
**To:** thpo@estoo.net; Diane Hunter; lpappenfort@peoriatribe.com; Matthew.Bussler@pokagonband-nsn.gov; michael.laronge@fcpotawatomi-nsn.gov  
**Cc:** Allen, Michelle (FHWA); Miller, Shaun (INDOT); Kyle J. Boot; Branigin, Susan  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana  
**Attachments:** US231Greencastle\_Des1700121\_CPMtgAddInfoLtrAndMnts\_2020-05-20.pdf  
**Follow Up Flag:** Follow up  
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Thank you in advance for your input,

**Kelyn Alexander**

*Historian*

*Cultural Resources Office*

*Environmental Services*

100 N. Senate Ave., Room N642

Indianapolis, IN 46204

**Office:** (317) 234-4147

**Email:** [kalexander3@indot.in.gov](mailto:kalexander3@indot.in.gov)

**\*\* Historic Property Report (HPR) guidelines can be found [here](#)**

## Kyle J. Boot

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**From:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Sent:** Tuesday, May 26, 2020 7:40 AM  
**To:** Kyle J. Boot  
**Subject:** FW: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Kyle,

Please see below a response from the Forest County Potawatomi Community.

Kelyn Alexander  
Historian  
INDOT-Cultural Resources Office  
317.234.4147  
[KAlexander3@indot.in.gov](mailto:KAlexander3@indot.in.gov)

---

**From:** Michael LaRonge <Michael.LaRonge@fcpotawatomi-nsn.gov>  
**Sent:** Friday, May 22, 2020 6:30 PM  
**To:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Subject:** RE: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

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

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RE: INDOT Project ID #1700121, US 231 road rehabilitation project, Putnam County, Indiana.

Dear Ms. Alexander,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community, a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act.

Based on the information provided in the archaeological report, it appears that the project is not likely to affect any historic properties. Thus, the Tribal Historic Preservation Office is pleased to offer a finding of no historic properties affected with two conditions. First should the SHPO comment differ the Tribe reserves the right to reconsider this finding based on new evidence. Next, in the event that human remains or archaeological materials are exposed as a result of project activities work must halt and the Tribe must be included in any consultation regarding treatment and disposition of the find prior to removal.

Your interest in protecting cultural and historic properties is appreciated. If you have any questions or concerns, please contact me at the email address or phone number listed below.

Respectfully,

Michael LaRonge  
Tribal Historic Preservation Officer  
Cultural Preservation Division  
Forest County Potawatomi Community  
8130 Mish ko Swen Drive  
P.O. Box 340  
Crandon, Wisconsin 54520  
Phone: 715-478-7354  
Email: [Michael.LaRonge@FCPotawatomi-nsn.gov](mailto:Michael.LaRonge@FCPotawatomi-nsn.gov)

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**From:** Alexander, Kelyn <[KAlexander3@indot.IN.gov](mailto:KAlexander3@indot.IN.gov)>  
**Sent:** Thursday, April 23, 2020 8:11 AM  
**To:** Carmany-George, Karstin (FHWA) <[k.carmanygeorge@dot.gov](mailto:k.carmanygeorge@dot.gov)>; Michael LaRonge <[Michael.LaRonge@fcpotawatomi-nsn.gov](mailto:Michael.LaRonge@fcpotawatomi-nsn.gov)>; [thpo@estoo.net](mailto:thpo@estoo.net); [Matthew.Bussler@pokagonband-nsn.gov](mailto:Matthew.Bussler@pokagonband-nsn.gov); [lpappenfort@peoriatribe.com](mailto:lpappenfort@peoriatribe.com)  
**Cc:** Miller, Shaun (INDOT) <[smiller@indot.IN.gov](mailto:smiller@indot.IN.gov)>; Kumar, Anuradha <[akumar@indot.IN.gov](mailto:akumar@indot.IN.gov)>; Branigin, Susan <[SBranigin@indot.IN.gov](mailto:SBranigin@indot.IN.gov)>; Kyle J. Boot <[KBoot@RQAW.com](mailto:KBoot@RQAW.com)>  
**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a consulting party letter with a meeting invitation has 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 within seven (7) days.

Consulting parties have thirty (30) calendar days from receipt of this information to review and provide comment. Tribal contacts may contact Shaun Miller at [smiller@indot.in.gov](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,

**Kelyn Alexander**

*Historian*

*Cultural Resources Office*

*Environmental Services*

100 N. Senate Ave., Room N642

Indianapolis, IN 46204

**Office:** (317) 234-4147

**Email:** [kalexander3@indot.in.gov](mailto:kalexander3@indot.in.gov)

**\*\* Historic Property Report (HPR) guidelines can be found [here](#)**



May 26, 2020

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, Indiana 46038

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

Re: DUAL REVIEW: Additional project information for the May 11, 2020, Section 106 consulting parties meeting, consulting party correspondence, and minutes of the May 11 meeting, for the US 231 Road Rehabilitation Project, in Greencastle, Putnam County, Indiana (Des. No. 1700121; DHPA No. 23587)

Dear Mr. Boot:

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, the Section 106 “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 Office Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana,” Indiana Code 14-21-1-18, and 312 Indiana Administrative Code (“IAC”) 20-4, the staff of the Indiana State Historic Preservation Officer (“Indiana SHPO staff” or “INDNR-DHPA”) has conducted an analysis of the materials dated April 23, 2020 and received electronically on the same date, and the minutes of the May 11 meeting, which we received on May 20, for the above-indicated project within the City of Greencastle, Putnam County, Indiana.

Thank you for providing the additional information prior to the consulting parties meeting held on May 11, 2020, as well as the meeting minutes more recently.

### Dual Review Proposal

Due to changes in the US 231 Road Rehabilitation Project design that will increase the scope within National Register Historic Register-listed historic districts, INDOT has requested that the project, which is to be funded by both FHWA and INDOT, now be made subject to Dual Review, Pursuant to 312 Indiana Administrative Code (“IAC”) 20-4-11.5. The project is to be funded by both FHWA and INDOT, so, ostensibly it could qualify for Dual Review. However, the wording of the Dual Review rule strongly implies that Dual Review is to be requested at the outset of the federal Section 106 review process. We believe the purpose of that timing is to ensure that all interested persons (which includes Section 106 consulting parties) and members of the Indiana Historic Preservation Review Board (“Review Board”) are notified of the project early on, so that they can follow along at each step of the review process. Eventually, if INDNR-DHPA issues a Director’s Letter of Clearance under 312 IAC 20-4-11, which would exempt the project from needing a certificate of approval from the Review Board, then interested persons have a right to object to that determination by



requesting that the Review Board consider the project sponsor's certificate of approval application at a regular meeting of the Review Board.

At the May 11, 2020, Section 106 consulting parties meeting, INDNR-DHPA indicated that if the comment period regarding the subject matter of the May 11 meeting would be extended to 30 days after the date on which the Indiana SHPO comments, then interested persons would have adequate time to become familiar with the issues in this project, and we would agree that the review process could proceed from this point forward as a Dual Review. INDOT's representative indicated that it is acceptable to extend the comment period regarding the May 11 meeting to 30 days after the Indiana SHPO comments.

Accordingly, by copy of this letter, **INDNR-DHPA is providing notification of the commencement of the Dual Review to interested persons and members of the Review Board.** Notice of the commencement will also be posted on the division's website ([www.in.gov/dnr/historic/7440.htm](http://www.in.gov/dnr/historic/7440.htm)).

For the benefit of those recipients of this letter who are not Section 106 consulting parties, please be aware **that a copy of INDOT's April 23 letter and additional information, along with all previous submissions on this project by INDOT, can be found online at <http://erms.indot.in.gov/Section106Documents/>. From there, search by this project's designation number: 1700121.**

Based on the understanding described above and in the May 11 meeting minutes, **the deadline for providing comments to you ([kboot@rqaw.com](mailto:kboot@rqaw.com)) on the subject matter of the May 11 consulting parties meeting regarding the US 231 Road Rehabilitation in Greencastle, is 30 days from the date of this letter.**

It should be understood for future reference, however, that ordinarily a Dual Review proposal should be made at the outset of the Section 106, and that INDNR-DHPA will not necessarily agree that it is appropriate to commence Dual Review after the Section 106 review has advanced beyond the initiation stage of Section 106 review.

#### Clarification of minutes of the May 11 consulting parties meeting

Point 7. of the minutes states that we said, for state law purposes under the Dual Review rule, "a Director's Letter of Clearance would be issued with a 'No Adverse Effect's' finding, but interested parties need to be provided an opportunity review and/or request the State Historic Preservation Review Board review the project." That statement seems to imply that we anticipate the Section 106 finding will be No Adverse Effect and that we will be issuing a Director's Letter of Clearance. We do not recall saying anything that definite about the overall project finding or that we necessarily anticipate issuing a Director's Letter of Clearance. We do recall saying that we do think that certain elements of the project's scope would adversely certain historic districts. We also explained that, if we issue a Director's Letter of Clearance, the Dual Review rule provides interested persons with 15 days from receipt of the letter to ask that the Indiana Historic Preservation Review Board review the project to determine whether or not a certificate of approval should be granted, in spite of the Director's Letter of Clearance..

#### Area of Potential Effects

Concerning the changes to the design of the project by lengthening the northern terminus and shortening the southern terminus, the revised area of potential effects ("APE") presented appears to be of adequate size. As the meeting minutes indicate, southbound US 231 traffic that does not follow an official detour around the city during project construction may be encouraged to use an established truck route on South Jackson Street during construction, while northbound traffic continues to use one lane on Bloomington and Washington streets.

#### Robe Ann Park (eligible for the National Register of Historic Places ["NRHP"])

We do not think that the removal of three trees along the east side of Bloomington Street (US 231) from the grounds of Robe Ann Park will adversely affect the historic park. The mature elm tree already has been damaged (we suspect by a vehicle or by wind), and the ash tree is thought to be dead. The mature silver maple tree appears to be well but, like the other two, very close to the existing sidewalk, and its removal would not change the

appearance of the park significantly, given the presence of many other trees. We appreciate the intention to avoid the concrete steps leading from the sidewalk to the park, except for replacing the more modern, concrete landing at sidewalk level.

At the May 11 meeting, it was explained that the limestone steps leading to the first house on the east side of Bloomington Street north of the main entrance to Robe Ann Park would need to be moved and reset farther to the east. The steps appear to be damaged and are sitting somewhat loosely in place. We think it would be appropriate to move, repair, turn over to reveal a smoother walking surface if necessary, and reset those limestone steps.

#### Eastern Enlargement Historic District (listed in the NRHP)

There was a discussion in the May 11 in the May 11 meeting about whether the sidewalks along Bloomington Street within this historic district need to be, or could be, replaced as part of this project. It is our understanding that we have been asked to comment on two scenarios: (1) limited tree removal along Bloomington Street, along with street milling and pavement overlay and replacement of curbs, gutters, curb ramps, and driveway approaches, and (2) in addition to the pavement milling and overlay and curb, gutter, curb ramp, and driveway approach replacements in (1), also replacing all sidewalks along both sides of Bloomington Street. Based on the road plans submitted here by INDOT, it appears that under scenario (1), only four trees along Bloomington Street and within the district “may be removed” or are “anticipated to be removed,” and that 20 trees are “anticipated to remain.” It is our understanding from the May 11 meeting that if all of the sidewalks are replaced under scenario (2), then most or all of the street trees (trees growing in the curb lawn between the street and the private properties outside the sidewalks) would have to be removed. The trees along Bloomington Street are described as ornamental and are not mentioned in the district’s NRHP nomination.

Based on our examination of an online streetview photography resource, it appears that many of the street trees, especially along the west side of Bloomington Street, already grow through utility lines, and it probably is only a matter of time before a utility company performs an unsympathetic trimming of them to protect the electric power lines or telephone lines. Some trees are relatively small or appear to be ornamental, but many appear to be mature and are tall. NRHP district nominations, which tend to focus on contributing buildings, do not always identify every contributing resource in the district or significant characteristic of its setting. Many of the trees along Bloomington Street stand within front yards, outside the right-of-way, and would not be removed by this project. The existing trees within the curb lawn are not continuous and do not display an overall plan of planting.

The removal of a relatively few street trees under scenario (1), along with the street pavement milling and overlay and curb, gutter, and curb ramp and driveway approach replacement, would not appear to us to change the Eastern Enlargement Historic District’s appearance significantly or to adversely affect the district.

Furthermore, based on what we have seen and heard so far, even if most or all of the trees within the curb lawn along Bloomington Street were removed by this project under scenario (2), we do not think it would have an adverse effect on the Eastern Enlargement Historic District. However, we value the opinions of consulting parties and interested persons, especially if those parties live or work near the project area, and our opinion on the effect of removal of most or all street trees along Bloomington Street might be influenced by their comments on whether the street trees contribute to the significance of the historic district or its setting and whether their removal would adversely affect the district.

There was discussion at the May 11 meeting about whether the concrete steps at the southeast corner of Bloomington Street and Washington Street would have to be replaced. Those steps are at the end of a limestone sidewalk we believe to be associated with a contributing house at 3 Bloomington Street. According to the plans, the limestone sidewalk would be avoided by project work. It is proposed that if the concrete steps are to be replaced, they would be replaced “in kind.” The term “in kind” tends to be used differently in different contexts. If what is meant here is that if the concrete steps are to be replaced, they would be replaced in concrete and in a

configuration as similar as possible to their current configuration, then we do not think their replacement would have an adverse effect on the Eastern Enlargement Historic District.

Full-depth pavement replacement is now proposed for Washington Street within the project area. In connection with that, INDOT has reported that a stone storm water sewer has been discovered below a storm water inlet on the south side of Washington, east of Locust Street. We have rarely, if ever before, encountered a storm water sewer quite like this stone drainage structure that apparently crosses under Washington Street from near the gas station at the intersection with Locust Street toward City Hall. We cannot say that it is unique in Indiana, but it strikes us as unusual, and its construction and materials (stone blocks and slabs) strongly suggest that it dates from the middle or late 19<sup>th</sup> century, within the period of significance of the Eastern Enlargement Historic District (1840 to 1961). We appreciate the research that RQAW has done. Although the research did not conclusively determine the year in which the drainage structure was built, it suggests that construction took place in the late 19<sup>th</sup> century.

INDOT does not consider the stone drainage structure to be historic, reasoning that it is similar to a brick street hidden by one or more later layers of asphalt. A brick street that has been paved over, however, was originally a highly visible driving surface that became part of the substructure of the street over time. We, however, think the stone drainage structure is more like a cistern or a coal cellar—an in-ground structure meant to serve other, above-ground properties but never intended to be easily seen. It is part of the built environment of the Eastern Enlargement Historic District. The engineers think it runs perpendicularly under Washington Street, but its condition, other than at the one storm sewer inlet from which it apparently was photographed, and whether it extends outside the right-of-way are unknown. Whether the stone drainage structure is long enough and has sufficient integrity either to be individually eligible for the NRHP or to contribute to the significance of the district (even though not mentioned in the nomination) cannot be determined from the information currently available, but our lack of knowledge does not mean the structure is necessarily insignificant. The structure is unusual enough that something might be learned from it about the construction of that early type of infrastructure in Indiana that is not already widely known or documented.

RQAW was uncertain at the May 11 consulting parties meeting whether the full-depth pavement replacement that is now proposed for Washington Street or the relocation of the modern storm sewer from under the street to a location under the curb or the sidewalk along the south side would either uncover or remove the stone drainage structure or require cutting through it horizontally. It seems to us that any of those is a possibility.

The stone drainage structure occupies a relatively small part of the project area, and it does not seem to us necessary to investigate further and to determine with certainty its significance to the Eastern Enlargement Historic District, prior to the commencement of construction. However, we think it would be valuable to document the structure if it becomes visible during excavation. If the structure is uncovered, excavated, or severed by full-depth street replacement or by relocation to the curb lawn or sidewalk of the more modern storm sewer running under the street, we ask that as much of the exterior or interior of the stone structure becomes visible be photographed and interior views be photographed and, if possible that at least its location be sketched on a plan and its interior and exterior cross section measured and sketched to create a permanent record of what was found. The photographs, location plan, cross section sketch, and dimensions of the stone arch drainage structure should be recorded on an archival gold CD or DVD, and one copy presented to our office, another copy presented to the Indiana State Archives, and at least one other copy be provided to one or more Putman County public or not-for-profit entities that would be willing to retain the CD or DVD indefinitely for the benefit of researchers.

According to the plans, numerous trees would be removed along both sides of Washington Street within the Eastern Enlargement Historic District. The plans indicate they would be replaced “in kind,” and the minutes state they would be replaced” with the same varieties.” We sense that most of the existing trees along Washington are only a few decades old. Consequently, we do not think that their replacement will have an adverse effect on the historic district.

Greencastle Courthouse Square Historic District (listed in the NRHP)

The improvements within this historic district would be similar to those along Washington Street within the Eastern Enlargement Historic District, with the addition of sidewalk replacement up to the edge of the right-of-way at either the fronts of buildings or at retaining walls and the possible removal of overhead signage and of mid-block pedestrian crosswalks leading to the courthouse. We do not foresee that any of the proposed improvements within the part of the project area lying within this Greencastle Courthouse Square Historic District will adversely affect the district.

Archaeology

Based upon the additional information submitted, we understand that the expanded area at the north end of the project lies within areas disturbed by previous construction of a recent and non-historical nature. We agree that no further archaeological investigations are necessary within the expanded project area.

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 must be reported to the INDNR-DHPA 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 Indiana Code 14-21-1-29 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 archaeological reviewer for this project on the Indiana SHPO staff is Beth McCord, and the structures reviewer is John Carr. However, if you have questions about our comments or about the review process, please contact initially the INDOT Cultural Resources Office staff members assigned to this project.

Future correspondence

Some recipients of a copy of this letter have received it because they were invited by INDOT to become “consulting parties” in this Section 106 consultation or because we, INDNR-DHPA, believe they potentially are “interested persons” in this partly state-funded project under the state law part of the Dual Review. **We will continue to copy invited parties who have accepted INDOT’s consulting party invitation by responding to you. We also will continue to copy other organizations or individuals who advise John Carr of my staff (jcarr@dnr.in.gov or 317-233-1949) that they are interested in, or concerned about, the project or otherwise want to continue to be copied. However, individuals, organizations, or agencies (other than federal or state government agency staff members, Review Board members, and consultants for INDOT) who neither accept the INDOT’s consulting party invitation nor advise us of their interest or concern will NOT receive copies of our correspondence on this project in the future.**

In all future correspondence regarding the US 231 Road Rehabilitation Project in Greencastle (Des. No. 1700121), please continue to refer to DHPA No. 23587.

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:JLC;jlc

Paper copies to consulting parties and potentially interested persons:

Greencastle Common Council, c/o Lynda Dunbar,  
Clerk Treasurer  
Board of Commissioners of Putnam County  
c/o Lori Hallett, County Auditor  
Owner of house at 3 Bloomington Street

E-mail copies to consulting parties, consultants, and potentially interested persons:

Michelle Allen, P.E., FHWA  
Robert Dirks, P.E., FHWA  
Anuradha Kumar, INDOT  
Shaun Miller, INDOT  
Susan Branigin, INDOT  
Kelyn Alexander, INDOT  
Matthew Coon, Ph.D., INDOT  
Shirley Clark, INDOT  
Steven Walls, INDOT, Crawfordsville District  
Kyle Boot, RQAW  
Lisa Casler, RQAW  
Joe Dabkowski, RQAW  
Andrew Martin, RPA, Cultural Resource Analysts, Inc.  
William A. Dory, Jr., Mayor of Greencastle  
Brad Phillips, Superintendent, Greencastle  
Department of Public Works  
Rob Weinschenk, Greencastle Parks & Recreation Department,  
operator of Robe Ann Park and house north of park main entrance  
Board of Commissioners of Putnam County,  
c/o Lorie Hallett, County Auditor  
Michael Ricketts, Putnam County Highway Supervisor  
Miami Tribe of Oklahoma  
Eastern Shawnee Tribe of Oklahoma  
Forest County Potawatomi Community  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indiana  
Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.  
Putnam County Museum  
Heritage Preservation Society of Putnam County  
Main Street Greencastle  
Dr. Mark McCoy, President, DePauw University  
Jeffrey Hubble, Superintendent, Greencastle Community  
School Corporation  
Main Street Greencastle  
Putnam County Chamber of Commerce  
Putnam County Visitor Bureau  
Putnam County Community Foundation, Inc.  
Emily Eckardt, Indiana Landmarks, Western Regional Office  
Beth K. McCord, INDNR-DHPA  
John Carr, INDNR-DHPA

E-mail copies to Indiana Historic Preservation Review Board members:

J. Scott Keller, Review Board  
Anne Shaw Kingery, Review Board  
Daniel Kloc, AIA, Review Board  
Jason Larrison, AIA, Review Board  
Chandler Lighty, Review Board  
Joshua Palmer, AIA, Review Board  
April Sievert, Ph.D., Review Board  
Christopher Smith, Deputy Director, INDNR, and Chairman, Review Board

## Kyle J. Boot

---

**From:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Sent:** Friday, June 19, 2020 12:13 PM  
**To:** Kyle J. Boot  
**Subject:** FW: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Kyle,

Please see below, a response from the Forest County Potawatomi Community.

-Kelyn

**Kelyn Alexander**  
*Historian*  
*Cultural Resources Office*  
*Environmental Services*  
100 N. Senate Ave., Room N642-ES  
Indianapolis, IN 46204  
**Office:** (317) 234-4147  
**Email:** [kalexander3@indot.in.gov](mailto:kalexander3@indot.in.gov)

**\*\* Historic Property Report (HPR) guidelines can be found [here](#)**

---

**From:** Michael LaRonge <Michael.LaRonge@fcpotawatomi-nsn.gov>  
**Sent:** Friday, June 19, 2020 11:56 AM  
**To:** Alexander, Kelyn <KAlexander3@indot.IN.gov>  
**Subject:** RE: FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

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

---

RE: INDOT Project Des. No.1700121, US 231 Road Rehabilitation Project, Putnam County, Indiana.

Dear Kelyn,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community, a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act.

This response is regarding the project mention above. Tribal Historic Preservation Office (THPO) staff has reviewed the materials you provided for the project. The FCPC THPO is pleased to offer a finding of no historic properties affected, with two conditions. First, should the SHPO comments differ the Tribe reserves the right to reconsider based on the new information provided. Second, in the event that human remains or archaeological materials are exposed as a result

of project activities work must halt and the Tribe must be included in any consultation regarding treatment and disposition of the find prior to removal.

Your interest in protecting cultural and historic properties is appreciated. If you have any questions or concerns, please contact me at the email address or phone number listed below.

Respectfully,

Michael LaRonge  
Tribal Historic Preservation Officer  
Cultural Preservation Division  
Forest County Potawatomi Community  
8130 Mish ko Swen Drive  
P.O. Box 340  
Crandon, Wisconsin 54520  
Phone: 715-478-7354  
Email: [Michael.LaRonge@FCPotawatomi-nsn.gov](mailto:Michael.LaRonge@FCPotawatomi-nsn.gov)

---

**From:** Alexander, Kelyn <[KAlexander3@indot.IN.gov](mailto:KAlexander3@indot.IN.gov)>

**Sent:** Wednesday, May 20, 2020 9:07 AM

**To:** [thpo@estoo.net](mailto:thpo@estoo.net); Diane Hunter <[dhunter@miamination.com](mailto:dhunter@miamination.com)>; [lpappenfort@peoriatribe.com](mailto:lpappenfort@peoriatribe.com);  
[Matthew.Bussler@pokagonband-nsn.gov](mailto:Matthew.Bussler@pokagonband-nsn.gov); Michael LaRonge <[Michael.LaRonge@fcpotawatomi-nsn.gov](mailto:Michael.LaRonge@fcpotawatomi-nsn.gov)>

**Cc:** Allen, Michelle (FHWA) <[michelle.allen@dot.gov](mailto:michelle.allen@dot.gov)>; Miller, Shaun (INDOT) <[smiller@indot.IN.gov](mailto:smiller@indot.IN.gov)>; Kyle J. Boot <[KBoot@RQAW.com](mailto:KBoot@RQAW.com)>; Branigin, Susan <[SBranigin@indot.IN.gov](mailto:SBranigin@indot.IN.gov)>

**Subject:** FHWA Project: Des. No. 1700121; US 231 Road Rehabilitation, Greencastle, Putnam County, Indiana

**Des. No.:** 1700121

**Project Description:** US 231 Road Rehabilitation Project

**Location:** Greencastle, Putnam County, Indiana

The Indiana Department of Transportation (INDOT), with funding from the Federal Highway Administration, proposes to proceed with the US 231 road rehabilitation project, Des. No. 1700121. The Section 106 Early Coordination Letter for this project was distributed on March 4, 2019.

As part of Section 106 of the National Historic Preservation Act, a consulting party meeting was held on May 11, 2020. Meeting minutes have been prepared and are ready for review and comment by consulting parties.

Please review a distribution letter and the minutes 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 immediately.

Consulting parties have until COB May 26, 2020 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](mailto:smiller@indot.in.gov) or 317-233-6795 or Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344.

Thank you in advance for your input,

**Kelyn Alexander**  
*Historian*

US 231 Road Rehabilitation Project  
Greencastle, Putnam County Indiana; Des. No.: 1700121  
Section 106, 800.11

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## Appendix E:

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# Historic Property Report & Archaeology Report Summaries



# US 231 Road Rehabilitation

## Greencastle, Putnam County, Indiana

INDOT Des. No.: 1700121

Indiana DHPA No.: 23587



7/16/2019

## Historic Property Report

Prepared for:

The Federal Highway Administration  
and Crawfordsville District, Indiana

Department of Transportation

Prepared by:

Handwritten signature of Kyle J. Boot

Kyle J. Boot

KBoot@RQAW.com



8770 North Street, Suite 110  
Fishers, IN 46038  
Phone: (317) 588-1762  
[www.rqaw.com](http://www.rqaw.com)

# US 231 Road Rehabilitation Greencastle, Putnam County, Indiana INDOT Des. No.: 1700121 Indiana DHPA No.: 23587

## HISTORIC PROPERTY REPORT

### I. MANAGEMENT SUMMARY

This report documents the identification and evaluation efforts for properties included in the Area of Potential Effects (APE) for the US 231 Road Rehabilitation Project in Greencastle, Putnam County, Indiana. Aboveground 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 listed in the National Register of Historic Places (NRHP). As this project is receiving funding from the Federal

Highway Administration (FHWA), it is subject to a Section 106 review.

The APE contains two properties listed in the NRHP:

- Courthouse Square Historic District (NR-0656/ IHSSI # 133-250-65001) (roughly bound by Franklin, College, Walnut, and Market Streets), and
- Eastern Enlargement Historic District (NR-2230/ IHSSI # 133-250-68001) (roughly bound by Franklin, Wood, Anderson, Seminary, and College Streets).

The APE contains one property that is recommended eligible for listing in the NRHP:

Robe Ann Park (IHSSI # 133-250-69053) at South Bloomington Street (US 231).



# INDIANA ARCHAEOLOGICAL SHORT REPORT

State Form 54566 (1-11)

## 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.

Author: Michael J. Curran

Date (month, day, year): June 21, 2019

Project Title: A Phase Ia Archaeological Field Reconnaissance for Proposed U.S. 231 Improvements in Greencastle, Putnam County, Indiana (Des. No. 1700121) (CRA Contract Publication Series 19-504)

### PROJECT OVERVIEW

**Project Description:** The Indiana Department of Transportation (INDOT) is proposing road improvements to U.S. 231 in the town of Greencastle, Putnam County, Indiana (Figure 1). The study was conducted at the request of RQAW Corporation. The primary need for the project is based on the deteriorated pavement structure and poor storm water drainage. The secondary purpose is to provide American Disability Act (ADA) compliant pedestrian facilities. Proposed construction associated with the project includes: 1) a minor structural overlay in the southern half and pavement replacement in the northern half of the project; 2) replacing the curb and gutters; 3) replacing curb ramps not meeting ADA regulations; 4) replacing sidewalks adjacent to replaced curbs; 5) replacing and moving a water line outside of the roadway to below the grass buffer or the sidewalk. Sidewalks behind the grass buffer (lawn between the back of the curb and sidewalks) will remain in place. The project will require temporary and permanent right-of-way (ROW). The survey area for the proposed undertaking measures approximately 2,927 m (9,603 linear ft) in length along U.S. 231, and covers approximately 6.7 ha (16.6 acres) (Figures 2 and 3a-3d).

INDOT Designation Number/ Contract Number: Des. No. 1700121 Project Number: CRA No. I19R006

DHPA Number: N/A Approved DHPA Plan Number: N/A

Prepared For: RQAW Corporation

Contact Person: Joe Dabkowski

Address: 10401 North Meridian Street, Suite 401

City: Indianapolis State: IN ZIP Code: 46290

Telephone Number: (317) 815-7232 Email Address: JDabkowski@rqaw.com

Principal Investigator: Andrew V. Martin, RPA 61710

Signature:

Company/Institution: Cultural Resource Analysts, Inc. (CRA)

Address: 201 Northwest 4th Street, Suite 204

## Results

- Archaeological records check has determined that the project area does not have the potential to contain archaeological resources.
- Archaeological records check has determined that the project area has the potential to contain archaeological resources.
- Phase Ia reconnaissance has located no archaeological resources in the project area.
- Phase Ia reconnaissance has identified landforms conducive to buried archaeological deposits.

Actual Area Surveyed hectares:  acres:

Comments:

Due to previous construction activities, at least 95 percent of the survey area was disturbed. Shovel testing in Robe Ann Park was positioned as far from utility and other disturbances as possible. Disturbed shovel test profiles conformed most closely to urban land (Udorthents) soils and typically consisted of a brown (10YR 4/3) silt loam sod-cap that contained many angular gravels. The underlying Bt-horizon was abruptly encountered at depths between 12 and 20 cm bgs, and consisted of a brownish yellow (10YR 6/6) silt loam with many angular gravels. Undisturbed soil profiles were encountered in the northern portion of the park on a landform mapped as Xenia silt loam and consisted of a dark grayish brown (10YR 4/2) silt loam Ap-horizon to depths between 15 and 25 cm bgs, overlying a yellowish brown (10YR 5/6) silt loam Bt-horizon (Soil Survey Staff 2019a). These soils were consistent to the Xenia soil series (Soil Survey Staff 2019b).

### Recommendation

- The archaeological records check has determined that the project area has the potential to contain archaeological resources and a Phase Ia archaeological reconnaissance is recommended.
- The archaeological records check has determined that the project area does not have the potential to contain archaeological resources and no further work is recommended before the project is allowed to proceed.
- The Phase Ia archaeological reconnaissance has located no archaeological sites within the project area and it is recommended that the project be allowed to proceed as planned.

The Phase Ia archaeological reconnaissance has determined that the project area includes landforms which have the potential to contain buried archaeological deposits. It is recommended that Phase Ic archaeological subsurface reconnaissance be conducted before the project is allowed to proceed.

The Phase Ia archaeological reconnaissance has determined that the project area is within 100 feet of a cemetery and a Cemetery Development Plan is required per IC-14-21-1-26.5.

Cemetery Name:

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.**

## Appendix F:

---

# Preliminary Plans

Plans omitted to avoid duplication. See graphics in Appendix B of this CE document.

RECEIVED NOV 11 2020

**PUBLISHER'S AFFIDAVIT**

**State of Indiana  
Putnam County**

**SS:**

Personally appeared before the undersigned, who, being duly sworn, says that he is Publishers Representative of The Banner Graphic, a newspaper of general circulation, printed and published in the city of Greencastle, Indiana in the county aforesaid, and upon his oath further saith that the notice, of which the attached 30<sup>th</sup> day of October, 2020.

Diana Dick *Diana Dick*

Subscribed and sworn to before me, this 30<sup>th</sup> day of October, 2020.

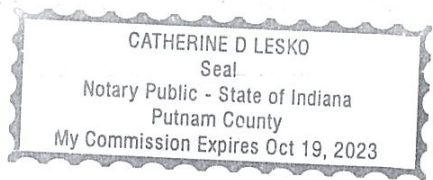
Catherine D. Lesko *Catherine D. Lesko*  
Notary Public

My Commission Expires: **October 19, 2023**

**51 Dollars and 68 Cents** in full for publishing the above notice.

**Date: November 2, 2020**

Amount taxed: \$ \_\_\_\_\_



Public Notice  
Des. No. 1700121

The Indiana Department of Transportation (INDOT) is planning to undertake a Road Rehabilitation Project, funded in part by the Federal Highway Administration (FHWA). The project is located on US 231 and extends from SR 240 (Veterans Memorial Highway) north to approximately 35 feet north of Frazier Street in the City of Greencastle, Putnam County, Indiana.

Under the preferred alternative, the proposed project would involve minor structural overlay from SR 240 to the Washington Street/Bloomington Street intersection, full-depth pavement replacement from the Washington Street/Bloomington Street intersection to approximately 100 feet north of Shadowland Avenue, and pavement overlay from approximately 100 feet north of Shadowland Avenue to 35 feet north of Frazier Street. At the current design phase, approximately 0.70 acre of temporary and 0.15 acre of permanent right-of-way is anticipated. The project is anticipated to be let in 2022.

Properties listed in or eligible for the National Register of Historic Places (NRHP) located within the Area of Potential Effects (APE) include Courthouse Square Historic District, Eastern Enlargement Historic District, and Robe Ann Park. The proposed action impacts properties listed in or eligible for the NRHP. INDOT, on behalf of the FHWA, has issued a "No Adverse Effect" finding for the project because the project will not diminish the integrity of the characteristics that qualify the historic properties within the APE for inclusion in the NRHP. In accordance with the National Historic Preservation Act, the views of the public are being sought regarding the effect of the proposed project on the historic elements as per 36 CFR 800.2(d), 800.3(e) and 800.6(a)(4). Pursuant to 36 CFR 800.4(d)(2), the documentation specified in 36 CFR 800.11(e) is available for inspection in RQAW's office. Additionally, this documentation can be viewed electronically by accessing INDOT's Section 106 document posting website IN SCOPE at <http://erms.indot.in.gov/Section106Documents>. This documentation serves as the basis for the "No Adverse Effect" finding. The views of the public on this effect finding are being sought. Please reply with any comments to Kyle Boot of RQAW, 8770 North St., Ste. 110, Fishers, IN 46038, 317-588-1762 or [kboot@rqaw.com](mailto:kboot@rqaw.com) no later than November 30, 2020.

The undertaking will convert property from the Eastern Enlargement Historic District, a Section 4(f) property, to a transportation use. All alternatives were considered to avoid and minimize impacts to the property. The designed action will not adversely impact the activities, features, or attributes that qualify the property for protection under Section 4(f) of the Department of Transportation Act of 1966 and in accordance with SAFETEA-LU Section 6009 (a). As such, it is the intent of INDOT, along with FHWA, to issue a finding of de minimis. In accordance with SAFETEA-LU Section 6009 (a), the views of the public are being sought regarding the effect of the proposed project on this historic property.

In accordance with the "Americans with Disabilities Act", if you have a disability for which INDOT needs to provide accessibility to the document(s) such as interpreters or readers, please contact Ann Bishop at 419-934-5559 or [abishop@indot.in.gov](mailto:abishop@indot.in.gov).  
hspxlp October 30-1t

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



November 20, 2020

Kyle Boot  
Architectural Historian  
RQAW  
8770 North Street, Suite 110  
Fishers, Indiana 46038

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

Re: DUAL REVIEW: Indiana Department of Transportation’s finding of “no adverse effect” on  
behalf of the Federal Highway Administration for the US 231 Road Rehabilitation Project,  
in Greencastle, Putnam County, Indiana (Des. No. 1700121; DHPA No. 23587)

Dear Mr. Boot:

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, the Section 106 “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 Office Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana,” Indiana Code 14-21-1-18, and 312 Indiana Administrative Code (“IAC”) 20-4, the staff of the Indiana State Historic Preservation Officer (“Indiana SHPO staff” or “DNR-DHPA) has reviewed INDOT’s October 26, 2020 letter and enclosed finding which was received by our office on the same day.

For the benefit of those recipients of a copy of this letter who are not Section 106 consulting parties, please be aware that the documents discussed here can be found online in IN SCOPE at <http://erms.indot.in.gov/Section106Documents/>. From there, search by one of this project’s designation numbers, such as 1700811.

As stated in our previous correspondence, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the National Register of Historic Places (“NRHP”) within the proposed project area. However, this identification is subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature.

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 Indiana Code 14-21-1-29) requires that the discovery be reported to DNR-DHPA 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 Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal statutes and regulations, including but not limited to 36 C.F.R. Part 800.

We agree that the scope of work should have no adverse effect on Robe Ann Park, the Eastern Enlargement Historic District, and the Courthouse Square Historic District.



Accordingly, we concur with INDOT's October 23, 2020, Section 106 finding, on behalf of FHWA, of "No Adverse Effect" for this federal undertaking. Furthermore, we agree in regards to the Section 4(f) use of the Courthouse Square Historic District that it constitutes a temporary occupancy.

INDOT's April 23, 2020 letter requested that this project be subject to a Dual Review pursuant to 312 Indiana Administrative Code ("IAC") 20-4-11 due to changes in the US 231 Road Rehabilitation Project design that would increase the scope within National Register Historic Register-listed historic districts. According, in regard to the application for a Certificate of Approval from the Indiana Historic Preservation Review Board for the above indicated project, although the project area is within the Courthouse Square Historic District and the Eastern Enlargement Historic District that are listed in the National Register of Historic Places, and within Robe Ann Park that is considered eligible for inclusion in the National Register of Historic Places, based on what we currently know, there will be no adverse impact on any known historic site or historic structure that is state owned. Therefore, under Subsection 11(c) of 312 IAC 20-4, a certificate of approval will not be necessary from the Indiana Historic Preservation Review Board for this project.

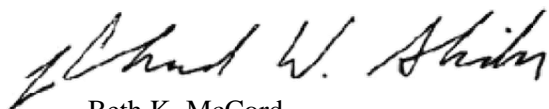
Pursuant to 312 IAC 20-4-11(g), within fifteen (15) days after this determination, an interested person may request a member of the review board to provide public hearing and review under 312 IAC 2-3. The designated member shall issue a determination whether an application for a certificate of approval must be filed. If the designated member determines an application must be filed, the division shall place the completed application on the agenda of the review board's next meeting. If the designated member determines that an application for a certificate is not required, the division director's letter of clearance is affirmed. A determination under this subsection is not effective until the later of the following:

- (1) fifteen (15) days after issuance of the determination; or
- (2) the day resulting from a notice given under 312 IAC 2-3-7(d).

The archaeological reviewer for this project on the Indiana SHPO staff is Beth McCord. Please note that the structures reviewer is now Chad Slide. However, if you have questions about our comments or about the review process, please contact initially the INDOT Cultural Resources Office staff members assigned to this project.

In all future correspondence regarding the US 231 Road Rehabilitation Project in Greencastle (Des. No. 1700121), please continue to refer to DHPA No. 23587.

Very truly yours,



Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:CWS:cws

Paper copies to consulting parties and potentially interested persons:

Greencastle Common Council, c/o Lynda Dunbar,  
Clerk Treasurer  
Board of Commissioners of Putnam County  
c/o Lori Hallett, County Auditor  
Owner of house at 3 Bloomington Street

E-mail copies to consulting parties, consultants, and potentially interested persons:

Michelle Allen, P.E., FHWA  
Robert Dirks, P.E., FHWA

Kyle Boot  
November 20, 2020  
Page 3

Anuradha Kumar, INDOT  
Shaun Miller, INDOT  
Susan Branigin, INDOT  
Kelyn Alexander, INDOT  
Matthew Coon, Ph.D., INDOT  
Shirley Clark, INDOT  
Steven Walls, INDOT, Crawfordsville District  
Kyle Boot, RQAW  
Lisa Casler, RQAW  
Joe Dabkowski, RQAW  
Andrew Martin, RPA, Cultural Resource Analysts, Inc.  
William A. Dory, Jr., Mayor of Greencastle  
Brad Phillips, Superintendent, Greencastle  
Department of Public Works  
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operator of Robe Ann Park and house north of park main entrance  
Board of Commissioners of Putnam County,  
c/o Lorie Hallett, County Auditor  
Michael Ricketts, Putnam County Highway Supervisor  
Miami Tribe of Oklahoma  
Eastern Shawnee Tribe of Oklahoma  
Forest County Potawatomi Community  
Peoria Tribe of Indians of Oklahoma  
Pokagon Band of Potawatomi Indiana  
Ron Hinsenkamp, West Central Indiana Economic Development District, Inc.  
Putnam County Museum  
Heritage Preservation Society of Putnam County  
Main Street Greencastle  
Dr. Mark McCoy, President, DePauw University  
Jeffrey Hubble, Superintendent, Greencastle Community  
School Corporation  
Putnam County Chamber of Commerce  
Putnam County Visitor Bureau  
Putnam County Community Foundation, Inc.  
Emily Eckardt, Indiana Landmarks, Western Regional Office  
Beth K. McCord, DNR-DHPA  
Chad Slider, DNR-DHPA

E-mail copies to Indiana Historic Preservation Review Board members:

J. Scott Keller, Review Board  
Anne Shaw, Review Board  
Daniel Kloc, AIA, Review Board  
Jason Larrison, AIA, Review Board  
Chandler Lighty, Review Board  
April Sievert, Ph.D., Review Board  
Christopher Smith, Deputy Director, INDNR, and Chairman, Review Board