

INDOT-Cultural Resources Listserv Index

Updated October 2023

Content has not been edited to reflect current INDOT-CRO policy. Please use to most recent post if there is a discrepancy. If you have questions please contact our office.

From: [Indiana Department of Transportation](#)
Subject: INDOT Cultural Resources Office - New Submission Procedure
Date: Thursday, August 10, 2023 2:03:48 PM

Greetings,

The INDOT Cultural Resources Office is implementing new measures in an effort to reduce our response times for submissions, and ultimately to reduce our overall turnaround times for reviews. Most of these changes are internal and will not affect current procedures.

However, we are announcing a significant change in the procedure for new submissions: the esdcro@indot.in.gov email address.

Starting immediately, all new document submissions (MPPAs, ECLs, HPRs, Phase Ia reports, etc.) should be sent to esdcro@indot.in.gov. **Please note that it is no longer necessary to copy the Team Leads or the CRO Manager on new submissions, as all will monitor the inbox.**

The esdcro@indot.in.gov email address is strictly for initial submissions and should not be copied on follow-up correspondence.

Since esdcro@indot.in.gov is an inbox only, you will not receive responses from that address. All responses from CRO, including our comments on review documents, will come from CRO staff as usual. **All inquiries and project related correspondence should be addressed to the assigned CRO staff as usual.**

Again, the esdcro@indot.in.gov email address is for initial submissions only and should not be copied on any other correspondence. Failure to send new submissions to the esdcro@indot.in.gov email address may result in delays in new submissions being assigned to CRO staff for review.

Thank you in advance for your assistance and cooperation with this new procedure!

Matt Coon
Manager, Cultural Resources Office
Indiana Department of Transportation
100 North Senate Ave., N758 — Environmental Services
Indianapolis, IN 46204
Phone: 317-697-9752
Email: mcoon@indot.in.gov

From: [Indiana Department of Transportation](#)
Subject: Limited Vertical Clearance Bridge Warning System Study
Date: Tuesday, April 25, 2023 2:34:37 PM

INDOT-CRO is pleased to announce that a Limited Vertical Clearance Bridge Warning System Study has been completed in compliance with the Memorandum of Agreement (MOA) for the US 41 Southbound Bridge over Pigeon Creek project. The bridge was a Parker through truss that required immediate closure and eventual replacement due to the severity of damage sustained from a vehicle collision. The study was developed as part of the MOA to mitigate for the loss of that historic bridge.

Vertical clearance through and below bridge structures is a statewide asset maintenance issue. Even when the vertical clearance meets standards but is limited, vehicle collisions remain a risk for these structures because of the potential for human error, such as oversized vehicles traveling without permits or off the approved route. The intent of the study is to provide general guidance to bridge asset owners and an escalating menu of available additional warning measures, to alert motorists to the presence of limited vertical clearance. The study examines the means available to Indiana bridge asset owners to alert drivers to limited clearance bridges with the goal of reducing or eliminating vehicle bridge strikes. It is up to the asset owner to weigh the benefits, drawbacks, installation costs and maintenance of each additional measure that may be suitable to the individual site conditions.

The study is available for download from the INDOT Historic Bridge Inventory webpage (under Historic Bridge Project Development Process Documents) at <https://www.in.gov/indot/current-programs/green-initiatives/indiana-historic-bridges-inventory/historic-bridges-inventory-summary-and-results/>

It can also be directly downloaded from the following link:
https://www.in.gov/indot/files/FinalReport_LimitedVerticalClearanceBridgeWarningSystemStudy_11-29-2022.pdf

Any questions can be sent to INDOTHistoricBridges@indot.IN.gov

Thank you,

Matt Coon
Manager, Cultural Resources Office
Indiana Department of Transportation
100 North Senate Ave., N758 - ES
Indianapolis, IN 46204
Phone: 317-697-9752
Email: mcoon@indot.in.gov

From: [Indiana Department of Transportation](#)
To: [Coon, Matthew](#)
Subject: INDOT Cultural Resources Staffing Updates
Date: Friday, March 10, 2023 2:56:12 PM

Greetings!

First, I need to correct a misstatement in my previous update: CRO turnaround times are running at around 30 business days (not calendar days as I had incorrectly written). I apologize for creating confusion with my error!

Second, I am pleased to announce some recent additions to our CRO staff:

Dawn Alexander

Dawn received her Master's in Archaeology from Texas A&M University. Her study of natural formation processes at the Gault Clovis Site aligned her primary research interests: understanding site context, post-depositional influences, and Clovis stone tool technology. Her work with Section 106 began in Indiana and the Midwest, eventually expanding to international experience managing cultural heritage resources within the energy sector. Her volunteer highlights include recording rock art in Arizona and multidisciplinary archaeological survey in Western New South Wales.

Haley Brinker

Haley received her B.S. in Classical Cultures from Ball State University and her M.A. in History with a Concentration in Public History from Indiana University. Her research interests include community trauma and reconciliation, community memory, and memorialization practices.

David Walton

David is a specialist in prehistoric archaeology broadly trained across the Americas with expertise in household excavations and stone tool analyses. David began his career in archaeology at The College of Wooster ('09) studying Late Woodland period (ca. AD 550–1150) rockshelter sites in northeast Ohio and the [Johnson's Island Civil War Prison site](#) along Lake Erie. His PhD [research](#) at Boston University ('17) focused on obsidian tool economies and households in central Mexico. Before joining INDOT, David spent six years in central Florida as a college professor and a year in Richmond as a research fellow with Earlham College working to analyze and digitize their museum's Native American artifacts collection. David is passionate about bringing archaeology to the public audience, recently appearing in an [episode](#) of *The UnXplained with William Shatner* (2022) on History channel and as a co-host of [Lost Pyramids of the Aztecs \(2020\)](#), a documentary that aired on the Science Channel ([Discovery Network](#)).

Finally, I would like to announce a job opening for the **Archaeology Team Lead** position:
<https://workforindiana.in.gov/job-invite/422037/>

This position supervises a staff of three archaeologists, manages INDOT's on-call archaeology contracts, and serves as a primary contact and subject matter expert for INDOT personnel, consultants, outside agencies, and consulting parties. Applicants should have supervisory/management experience, experience in interpreting and applying Section 106 and other historic preservation laws, and should meet the State of Indiana's requirements for a Qualified Professional Principal Investigator as per 312 IAC 21-3-4(b). Familiarity with INDOT CRO standards and procedures is a strong plus.

Salary range starts at \$67,314 but will be commensurate with education, job experience, and Qualified Professional status.

This position is rarely vacant, so please help us spread the word about this opportunity:
<https://workforindiana.in.gov/job-invite/422037/>

From: [Indiana Department of Transportation](#)
Subject: Courtesy Copy: INDOT Cultural Resources Office Updates: IN SCOPE, Archaeology Permit, Review Times
Date: Wednesday, January 18, 2023 10:37:32 AM

Greetings - Our first CRO update for 2023 rounds up some overdue announcements from late 2022:

1. IN SCOPE has migrated to a new system with the potential for increased future functionality. Please note the updated URL: <http://erms12c.indot.in.gov/Section106Documents/>

The old URL will automatically redirect to the correct address, but please be sure to use the updated templates that include the new URL: <https://www.in.gov/indot/crm/part-5-forms/>

2. A new archaeology blanket permit for 2023 allowing Phase Ia investigations on INDOT property is available at the previous link ([Part 5 - Forms](#)), or directly here: https://www.in.gov/indot/crm/files/INDOT_PhaseIa_archaeology_permit_2023.pdf

This update is long overdue, as our previous permit was from 2009. We will be renewing this permit every calendar year moving forward, so please be sure to always use the current permit.

3. Due to our ongoing staffing shortage, we are increasing our Turnaround Time (TAT) to 30 calendar days until further notice. Please note that this is likely to be a minimum TAT - if we receive 15 new submissions in a single day, some of them are necessarily going to be assigned for more than 30 calendar days in order to maintain a practicable and balanced staff workload.

The archaeology unit currently has a backlog that is more than 30 calendar days old. We are working to get through this and get back on schedule. I truly appreciate your patience during this time - we definitely look forward to being fully staffed and on schedule again as soon as possible!

Sincerely,

Matt Coon

Acting Manager, Cultural Resources Office

Archaeology Team Lead

Acting Tribal Liaison

INDOT Environmental Services

100 North Senate Avenue N758-ES

Indianapolis, IN 46204

Phone: 317-697-9752

Email: mcoon@indot.in.gov

From: [Indiana Department of Transportation](#)

Subject: INDOT Cultural Resources Office: The I-69 Audio Tour website is live!

Date: Tuesday, September 20, 2022 11:51:07 AM

INDOT-CRO is pleased to announce that the I-69 Audio Tour website has been completed in compliance with several Memoranda of Agreement (MOAs) for the I-69 Evansville to Indianapolis project. These audio tours are a series of vignettes that were produced as a unique mitigation effort to underscore the importance of the cultural resources present throughout I-69 Sections 1-4.

From the rolling landscape of the Buffalo Trace to the history of the Native American tribes that first inhabited the region, the 94 miles of terrain traversed by I-69 from I-64 to Bloomington holds stories that detail its history and settlement. The twelve tour segments were developed in coordination with consulting parties and highlight a variety of topics including Native American Tribes, the Wabash & Erie Canal, the Underground Railroad, Coal Mining, and Limestone, to name a few. To listen to the tours, please visit this website:

<https://www.in.gov/indot/projects/i69/audio-tour/>

From: [Indiana Department of Transportation](#)
Subject: INDOT-Cultural Resources-Updated Templates
Date: Wednesday, July 20, 2022 11:27:42 AM

INDOT-Cultural Resources Office is pleased to announce that we have updated our templates <https://www.in.gov/indot/crm/part-5-forms/>

The following templates have been updated:

- [CP and Tribal ECL Template](#)
- [ECL Submission](#)
- [Finding/800.11 Submission](#)
- [Post ECL Submission](#)
- [Section 106 MOA Template](#)
- [Section 106 Report Distribution Letter Template](#)

Effective immediately all new submissions should use the updated templates.

Thank you!

From: [Indiana Department of Transportation](#)
Subject: INDOT-Cultural Resources Office-Updated DHPA "Minimum Architectural Documentation Standards"
Date: Monday, May 9, 2022 3:08:08 PM
Attachments: [DNR_Minimum_Architectural_Documentation_Standards_041322.pdf](#)

The Indiana Department of Natural Resources-Division of Historic Preservation and Archaeology (DNR-DHPA) has updated the "Minimum Architectural Documentation Standards." Please see below the message from DHPA below regarding the updated Standards. The Standards are attached.

Please let your CRO reviewer know if you have any questions about the Standards, if applicable to your project.

The attached "Minimum Architectural Documentation Standards" are utilized to record significant buildings and structures that are either listed in or eligible for inclusion in the Indiana Register of Historic Sites and Structures or the National Register of Historic Places. DHPA staff may recommend consultants follow these standards to create a record of a resource in the event that it is altered or demolished as part of an environmental review or as mitigation for adverse effects.

Since the last Standards were adopted in 2011, changes in technology and the increase of digital submissions have necessitated adjustments. DHPA has removed references to film photography as digital images are widely accepted by DHPA, NPS, and the Indiana State Archives. Providing hard copy prints of digital photography remains an option, but DHPA has added electronic transfers of digital images as the preferred method. The general description has been expanded to account for the increased amount of bridge documentation, requirements about a photo log and photo key are clarified, and noted the updated digital requirements of file type and size. Please contact DHPA if you have questions about following these documentation standards as part of your environmental review submission.

- [DNR Minimum Architectural Documentation Standards 041322.pdf](#)
-

From: [Indiana Department of Transportation](#)
Subject: INDOT Cultural Resources Office-Update to Minor Projects PA Submittal Form
Date: Wednesday, April 20, 2022 11:29:26 AM
Attachments: [MPPA_SubmittalandAssessmentForm_Section1_April2022.docx](#)

Good morning!

INDOT-Cultural Resources Office is pleased to announce that we have updated our procedures for Minor Projects PA submittals to help streamline INDOT CRO's review and approval. Effective immediately all new submissions should be provided using the new MPPA Submittal and Assessment Form Section 1 attached and found on our website here: [INDOT: Cultural Resources Manual: Part 5 - Forms](#).

The MPPA Submittal and Assessment Form will allow the applicant to fill out the project information details on the same form that CRO will use to complete our approval. Therefore, the submittal and approval will be included on the same form. No separate forms are needed (unless Section 2 and Section 3 are required per the applicable category). Please note that Sections 2 and 3 have been updated and are also available on our website. After CRO's assessment is complete, the Submittal and Assessment Form will be returned to the applicant for inclusion in the NEPA document.

Please remember to submit the projects by posting the forms and associated documentation to Projectwise and using the email submittal template when notifying CRO of the submission.

Thank you.

- [MPPA_SubmittalandAssessmentForm_Section1_April2022.docx](#)
-

From: [Indiana Department of Transportation](#)

Subject: INDOT Cultural Resources Office-Historic Bridge Information Database

Date: Friday, April 8, 2022 11:10:55 AM

Good morning!

The Cultural Resources Office is pleased to announce that INDOT has a new Historic Bridge Information application available through INDOT's Technical Application Pathway (ITAP). It is an upgraded version of the database that was developed by INDOT's consultant as part of the Indiana Historic Bridge Inventory. The original database was created and developed in Microsoft Access 2000 format between 2006 and 2010. It was used as a tool to apply the National Register criteria and to apply the methodology to identify Select and Non-Select bridges. INDOT migrated the database information in 2021-2022 to an Oracle-based application with a web-based interface accessible via ITAP for better long-term maintenance of the information and easier access.

If not already an ITAP user, to gain access to ITAP, follow the instructions in the Quick Start Guide found at the Doing Business with INDOT page: <https://www.in.gov/indot/doing-business-with-indot/>. Within ITAP, you must request access to the Historic Bridge Information application via the Enroll New Application function (found under the Menu in the top left corner and/or under the Action Links on the right side of the page). After enrollment, the Historic Bridge Information database will appear in the list of applications on the ITAP dashboard as "Historic Bridge." Hitting the "Launch" button to the right of the application name will open the database. Upon entering the Historic Bridge Information database, you will see the Dashboard page from which you can search for bridges. A user manual is located within the application via the Help button in the top right corner.

Please direct any questions to Mary Kennedy, Historic Bridge Specialist, at 317-694-3607 or mkennedy@indot.in.gov.

From:

To: Courtesy Copy: INDOT-CRO Updated Section 106 Correspondence Templates
Friday, February 18, 2022 10:17:41 AM

Subject:

Date:

INDOT-CRO has updated its Section 106 Correspondence Templates and they are effective immediately. The updated templates include the following changes:

- Contact information for CRO's new Tribal Liaison Patty Jo Korzeniewski
- New INDOT Commissioner Michael Smith in letterhead

The updated templates can be found here: [INDOT: Cultural Resources Manual: Part 5 - Forms](#)

Thank you.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-Section106 Document Submittals via Projectwise: TEST
Date: Friday, October 29, 2021 10:28:32 AM

Good morning,

INDOT's Cultural Resources Office is hereby requiring that all Section 106 documents submitted for INDOT-CRO review be done via Projectwise. ProjectWise is a suite of software provided by Bentley Systems which is used to transfer, share, and store files associated with various INDOT projects. ProjectWise is being used by INDOT as a project lifecycle tool and is the location of all active project data, including email communications, project-specific files, Geographic Information Systems (GIS) layers, maps, permits, and approved reports.

Obtaining access and using ProjectWise will:

- Provide access to shared files
- Standardize the method of document submittals
- Reduce the number of emails containing large files
- Remove the need for file share websites
- Reduce the potential for document loss or misplacement
- Assist with document review (i.e., access to multiple document versions)

To obtain access to ProjectWise-please follow the instructions provided at <http://www.in.gov/indot/3116.htm>.

A copy of the INDOT Consultant Quick Start User Guide can be accessed using the following link: http://www.in.gov/indot/div/cad/pubs/INDOT_Consultant_New_User.pdf

Please continue to follow the same CRO document naming conventions when adding documents to ProjectWise-[INDOT-CRO-Document-Naming-Conventions.pdf](#) .

After a document is added to ProjectWise, the link can be provided to the appropriate INDOT-CRO staff following typical document transmittal guidelines.

As a reminder, to ensure submittals are routed to the proper staff as quickly as possible, please remember to adhere to the following protocols. **Indicate in the subject line of your email if you're submitting an LPA or historic bridge project.**

- Send all review requests to Archaeology Team Lead Shaun Miller (smiller@indot.in.gov) and History Unit Team Lead Susan Branigin (sbranigin@indot.in.gov)
- For LPA projects (including Community Crossings and Local Trax reviews) add LPA Program Administrator Anthony Ross (aross3@indot.in.gov) as a cc.
- For historic bridge projects add Historic Bridge Specialist Mary Kennedy (mkenedy@indot.in.gov) as a cc.

Please note that it is not necessary to cc the INDOT-CRO Manager unless given guidance to do so by INDOT-CRO staff.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-Updates to Cultural Resources Manual
Date: Tuesday, October 26, 2021 10:41:37 AM

INDOT's Cultural Resources Office (INDOT-CRO) has updated several chapters in the Cultural Resources Manual primarily regarding guidance for consulting party meetings and Effects Reports.

A summary of the updates is below:

CRM Chapter	Revision
Part 2, Chapter 2	Updated Section 106 Timelines; edited to reflect where guidance for consulting party meetings can be found; Updated Links throughout
Part 2, Chapter 8	Added guidance for preparing Effects Reports; edited to reflect where guidance for consulting party meetings can be found
Part 2, Chapter 9	Edited to reflect where guidance for consulting party meetings can be found
Part 2, Chapter 13	New chapter on conducting consulting party meetings added to the CRM
Part 4, Chapter 2	Edited to reflect where guidance for consulting party meetings can be found
Effects Report Sample Format & Guidance	New form added to the CRM

The updated chapters can be found in the links and will be posted to INDOT's website soon. We appreciate your attention to preparing documents and navigating the Section 106 process in accordance with these updated chapters.

- [P2-Chapter 8-Assessment of Effects_UpdatedOct2021.pdf](#)
- [EffectsReport_Oct2021.pdf](#)
- [P2-Chapter 13-Procedures for Consulting Party Meetings_Oct2021.pdf](#)
- [P4-Chapter 2-Historic Bridge Project Development Process_UpdatedOct2021.pdf](#)
- [P2-Chapter 9-Resolving Adverse Effects_UpdatedOct2021.pdf](#)
- [P2-Chapter 2-FHWA,INDOT Section 106 Consultation Process Overview_UpdatedOct2021.pdf](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-INDOT Design Memo 21-19: Historic Bridge Review Submittals: TEST
Date: Thursday, September 16, 2021 2:35:23 PM

INDOT's Cultural Resources Office (CRO) wants to make consultants aware that recently issued INDOT Design Memo 21-19 pertains to Historic Bridge Review Submittals. The memo, effective immediately, notes that updates have been made to Chapters 14 and 412 of the Indiana Design Manual (IDM) to clarify the requirements of Bridge Preservation Projects on historic bridges. These updates apply to both rehabilitation and preventive maintenance work types, when they are processed through the *Programmatic Agreement Among the Federal Highway Administration, the Indiana Department of Transportation, the Indiana State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation Regarding the Management and Preservation of Indiana's Historic Bridges (Historic Bridges PA)*.

Please read, distribute, and implement the design memo as appropriate: [21-19 Updating Historic Bridge Design Review Submittal](#).

Design memos are available at: [INDOT: Doing Business with INDOT](#).

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Subject: INDOT-Cultural Resources-Increased Document Review Times
Date: Monday, May 24, 2021 1:21:58 PM

Due to our increased workload, INDOT's Cultural Resource Office is increasing our review times for certain documents. Please see below for an updated list of document review times:

1. Early coordination letters--10 business days;
2. MPPAs--20 business days;
3. HPR (long and short-form) reviews--20 business days;
4. All 800.11 reviews-- 20 business days;
5. Effects Analysis documents--20 business days;
6. Historic Bridge Alternative Analysis (HBAA) documents--20 business days

Please reach out to your CRO reviewer if you have any questions.

Thank you,

INDOT-CRO

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Subject: INDOT Cultural Resources Office-Updated Tribal Coordination-Archaeology Reports
Date: Thursday, April 15, 2021 9:55:34 AM

We have recently been informed by some of our Tribal partners that they would like to receive the results of archaeological fieldwork even though they may have not responded to the Section 106 Early Coordination Letter. THPOs are often inundated with requests to review Section 106 documents from several federal agencies and DOTs across many states. All too often, ECLs are overlooked or simply ignored because some THPOs simply do not have time to respond in the allotted 30 days. Based on discussions with some of our more active THPOs, FHWA and INDOT-CRO have decided to modify how they implement Tribal consultation. Archaeology reports will now be sent to all Tribes claiming an interest in the county, or counties, in which a project occurs regardless of whether the Tribe responded to the ECL. HPR's, Effect Letters, Findings, etc. will still only be sent to those Tribes that responded to the ECL. **Report Distribution Letters accompanying archaeology reports will now need to list the appropriate Tribes using the Tribal Contact table available on our website.** This guidance is effective immediately.

Thank you for your continued assistance in helping to administer FHWA and INDOT Tribal consultation!

If you have any questions regarding this policy, please contact Shaun Miller at smiller@indot.in.gov.

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Subject: INDOT-Cultural Resources Office-New Archaeology Guidance-Archaeological Short Reports and Linear Overlay Projects: TEST
Date: Friday, March 12, 2021 10:28:11 AM

Greetings from the Archaeology Unit of INDOT's Cultural Resources Office!

The Archaeology Unit is pleased to provide guidance documents for the Indiana Archaeological Short Report and linear overlay projects. Please see the attached guidance documents for more information. The guidance documents are also located on the INDOT Cultural Resources Office website at <https://www.in.gov/indot/2521.htm>.

Please contact Archaeology Unit Team Lead Shaun Miller at smiller@indot.in.gov or (317) 416-0876 if you have any questions.

- [LinearOverlayProjects_Archaeological_Guidance_March 2021.pdf](#)
- [ArchaeologicalShortReport_Guidance_March 2021.pdf](#)

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Subject: INDOT-CRO Updated Section 106 Email Templates and MPPA Submission Form_February 2021
Date: Friday, February 12, 2021 11:00:35 AM

Good morning,

Please see below information regarding updates to INDOT-CRO Email Templates and the MPPA Submission Form and Flowchart:

- The INDOT-CRO Email Templates have been revised to include “Document Type” in the subject heading to help with filing/organizing electronic communications. Additionally, a statement has also been added to indicate when archaeological assessments are included in Report Distribution Letters.
- The MPPA submission form has been modified so that consultants no longer have to make the decision of whether or not soils are disturbed, but need only to select soils are presumed to be disturbed with the understanding that CRO will notify them if soils are undisturbed and require an archaeological reconnaissance. Check boxes are now also incorporated to indicate if an archaeological report is included in the submission or is forthcoming.

The following forms and templates have been updated:

INDOT-CRO Consultation Email Templates:

ECL Submission: https://www.in.gov/indot/crm/files/INDOT-CRO%20Consultation%20Email%20Template-ECL%20Submission_2021-02-03.docx

Finding/800.11 Submission: <https://www.in.gov/indot/crm/files/INDOT-CRO%20Consultation%20Email%20Template%20-%20Finding-800.11%20Submission-2021-02-03.docx>

Post ECL Submission: https://www.in.gov/indot/crm/files/INDOT-CRO%20Consultation%20Email%20Template%20-%20Post-ECL%20Submissions_2021-02-03.docx

MPPA Submission Form and Flowchart:

https://www.in.gov/indot/crm/files/MPPA_Submission_Form_and_Flowchart_RevisedFebruary2021.docx

Please use these updated forms for all future submissions and correspondence.

Thank you.

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Subject: INDOT Cultural Resources Office-DHPA Document Submittal Policy Reminder and Update
Date: Tuesday, February 2, 2021 3:44:50 PM

Good afternoon!

Please see below the dashed line for an update from DHPA (SHPO) regarding their document submittal policy. No changes for FHWA/INDOT document submittals, except please note the change of email address for electronic submittals-see highlighted sentence.

As a reminder for FHWA/INDOT project submittals, if it is not possible to send a hard copy at this time, then DHPA will accept electronic email copies as formal submittals under the following conditions:

- Documents should be submitted as PDFs.
- For documents over 35 MB, IN SCOPE is acceptable. In these cases, attach the DHPA submittal form and include IN SCOPE directions. One exception-archaeology reports should always be attached.
- DHPA does not consider being cc'd on emails with other consulting parties as a formal submittal. **Please send submittals directly to DHPA, specifically to Miriam Burkett at dhpareview@dnr.IN.gov.**
- Hard copies should be provided to DHPA for their records as soon as feasible.
- CC the relevant CRO reviewer(s) on all emails to DHPA.

DHPA's review begins when they receive the electronic copy with PDFs or the completed hard copy in the office. Please contact the relevant CRO reviewer if you have any questions.

Submission of Projects for Review - The DHPA has made some changes in the submission process for Section 106, IC 14-21-1 and other federal and state regulatory review requests. We continue to require and process paper hard copy submissions and mail as received, and we understand that in some cases electronic review may be necessary for applicants and reviewers due to mandatory actions and remote work conditions.

To provide maximum flexibility, we request that all submissions to DHPA be provided in **BOTH electronic and paper copies**. **Send the electronic copy to Miriam Burkett at dhpareview@dnr.IN.gov**. The paper hard copy of the submission can be mailed as usual to 402 W. Washington Street, Room W274, Indianapolis, IN 46204. For State and National Register nominations, continue to follow standard procedures.

The Review Request Submittal, Application for Certificate of Approval (state project) and other review forms can be located on our website at dnr.IN.gov/historic.

We request that the electronic copy of the review submission include the appropriate form(s). Acceptable format for the attached documents, reports, photos, and plans is Portable Document Format (PDF). Please note that there is a 35 MB size limit for the electronic email copy of the submission. If your submittal is larger than 35 MB, try to minimize or reduce the size or quality. If necessary, the submission may also be split into two or more emails. For each message, be sure to reference in your subject line 1 of 2, 2 of 3, etc., if sending more than one email for a single review. Photos, maps, plans or other drawings/ graphics shall also be in PDF format and COLOR if possible. Please do not send each photograph as a separate file. If a different format is necessary for a particular type of review, we will contact you. Continue to submit structures and archaeological information as separate reports. These reports can be attached to the same email message if size allows, but we ask that there be one PDF of the Historic Property Report AND a separate PDF for the Archaeology Report. If the collective review materials are too large to reasonably be transmitted via email, we will continue to review based on the hard copy alone.

Thank you for your cooperation and patience as we adjust to some changes in our work processes. Please stay safe and healthy!

From: [Indiana Department of Transportation](#)
To: Courtesy Copy: INDOT-Cultural Resources Office-New Guidance for Historic Bridge Documentation
Tuesday, December 29, 2020 3:02:21 PM
Subject:
Date:

Good afternoon!

INDOT-CRO has an announcement regarding new guidance for historic bridge documentation. For any project processed through the Historic Bridges Programmatic Agreement (HBPA), SHPO may request photographic documentation as mitigation per Attachment B. Typically, this is in the form of color, digital images that provide overviews of the resource, along with detailed shots of character-defining features. These photos are prepared in accordance with the "Indiana DNR – Division of Historic Preservation and Archaeology Minimum Architectural Documentation Standards."

Moving forward, SHPO will also be requesting that a photo log that corresponds to the photographs, a photo key, and an overview thumbnail sheet be provided. This will help provide a more complete record of the resource, that will in turn, be uploaded by SHPO into SHAARD as part of the Historic Bridges files. PDF files of the photo log, photo key, and thumbnail sheet should be combined into one document to save space in SHAARD. Please see the link for an example.

Typically, upon approval, SHPO has requested that the documentation be provided to a local public or not-for-profit organization that is willing to accept a copy of the documentation and make it available to the public. This is still the case, and SHPO should be informed as to which organization is willing to accept the documentation.

Upon approval of the documentation, SHPO will submit a copy to the Indiana State Archives, which is different from recent years in which the bridge owner or their consultant had been responsible for submitting the documentation to the Archives. SHPO submittal of the documentation to the Archives will ensure a consistent process for these files to be grouped together accordingly at the Archives.

Draft and final copies of the documentation may be submitted to the SHPO on CD, DVD, or flash drive. Please reach out to the SHPO staff reviewer if considering an electronic file delivery site transfer to ensure it is accessible through the state system.

Although INDOT does not typically review historic bridge photo documentation before it is submitted to the SHPO and this is still the case, please copy the INDOT Historic Bridge Specialist, Mary Kennedy, on all correspondence with the SHPO staff regarding photo documentation submittals. INDOT does track compliance with this mitigation item.

Please contact Historic Bridge Specialist Mary Kennedy at 317-694-3607 or mkennedy@indot.in.gov with any questions.

- [SampleHistoricBridgePhotoDocumentation.pdf](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-FHWA Tribal Liaison Update
Date: Monday, December 28, 2020 2:33:52 PM

Greetings from the INDOT Cultural Resources Office (INDOT-CRO)!

Kari Carmany-George is the new Tribal liaison for the FHWA Indiana Division. Please make sure that Kari's name, number and email is included on all Section 106 correspondence. Section 106 forms and templates have been updated on our website to reflect this change: <https://www.in.gov/indot/crm/2341.htm>

All correspondence from this point forward should follow the updated templates with Kari's contact information.

Thank you.

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From: [Indiana Department of Transportation](#)
To: INDOT Cultural Resources Office-CRO-Map
Subject: Thursday, October 15, 2020 3:09:50 PM
Date:

Good afternoon,

INDOT-CRO is excited to announce the CRO-Public Web Map Application (CRO Map). This map provides a digital record of projects reviewed by INDOT-CRO. It is web-based, free, and completely open to the public.

We are continually updating the map, which is why we have asked for submissions to CRO to include shapefiles of project areas as well as APEs and NRHP-eligible property boundaries for full 106 projects. Please note though that the map does not represent the entirety of CRO reviews, present or historical.

It consists of four layers: Project Area, Area of Potential Effect (APE), Determined NRHP Eligible; and Determined Not NRHP Eligible.

- Project Area: general project areas for all projects reviewed by INDOT-CRO, including Excess Parcel reviews, Historic Bridge PAs (HBPA), Minor Projects PA (MPPA) determinations, and Full Section 106 reviews (indicated in the Attribute Table). These are for general reference; they do not represent actual construction limits.
- APE: APEs for projects that have gone through Full Section 106 review. The overall Finding for the project is indicated in the Attribute Table. If this is blank, the project may be ongoing.
- Determined NRHP Eligible: individual properties or districts that were recommended eligible through the Full Section 106 process and SHPO concurred. NOTE—these determinations are only indications of eligibility and the property/district may need to be reevaluated for each project.
- Determined Not NRHP Eligible: individual properties or districts that were determined not eligible to the National Register through the Full Section 106 process. NOTE—these determinations are only indications of eligibility and the property/district may need to be reevaluated for each project

The CRO Map can be a useful reference tool in conjunction with other sources, such as SHAARD and the IHBBM, for consultants, LPAs, and Project Managers in scoping the Section 106 process.

To learn more about the features and uses of the CRO Map, please join us in our next Brown Bag Session on October 30th. An invitation to the next Brown Bag Session will be sent out shortly. If you are not currently on the email list for the Brown Bag Sessions, please contact Anthony Ross at aross3@indot.in.gov and/or Patrick Carpenter at pacarpenter@indot.in.gov and they'll add you to the recipient list.

The map can be accessed through the following link: <https://arcg.is/OfnTn>

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-4th Virtual Brown Bag Session-Archaeology
Date: Thursday, September 10, 2020 11:28:37 AM

Greetings!

INDOT's Cultural Resources Office is holding its 4th Virtual Brown Bag Session on **Friday September 25th, 2020 at 12pm.**

In appreciation of Archaeology Month, for our September session we are going to focus on archaeology topics:

- Archaeological Survey Area and Phase Ia Best Practices
- Soil/Landform Identification and Phase Ic recommendation
- Cemetery Development Plans, Archaeology Assessments, and need for Resurvey/Addendums
- A Review of Recent Indiana Department of Transportation NRHP-Eligible Archaeological Sites

If you are interested in participating in this session and have not already signed up for this or other sessions, please send an email to aross3@indot.in.gov and/or pacarpenter@indot.in.gov.

Please forward this announcement to anyone who may be interested in participating.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Post-War Windshield Survey and HBAA/NEPA documents
Date: Tuesday, September 08, 2020 1:58:09 PM

Greetings!

INDOT-CRO has two announcements:

Windshield Survey of Post-War Neighborhoods

DHPA has published a sampling of neighborhoods that have been determined to be eligible for the National Register of Historic Places. These windshield survey forms were generated and evaluated as part of the Multiple Property Documentation Form (MPDF), *Residential Planning and Development in Indiana, 1940-1973*. Per DHPA, these are not all the neighborhoods that are eligible under the MPDF, but, they provide a spectrum of neighborhoods that will be useful to evaluation efforts. The windshield survey district examples have been determined eligible based on the registration requirements set out in the MPDF. These survey forms are reconnaissance level. Boundaries are preliminary and may be revised upon receipt of additional information. DHPA concentrated on districts since determinations of eligibility for individual post-war houses are reasonably straight-forward.

The windshield forms are grouped by the Indiana regions used as an analytical tool within the MPDF: Calumet, Falls of the Ohio, Indianapolis Metro, Vanderburgh County, and Vigo County. You can access the windshield forms through SHAARD: <https://secure.in.gov/apps/dnr/shaard/welcome.html>. You can search for the *Residential Planning and Development in Indiana* MPDF in the NRHP files. Once the MPDF entry has been selected, go to the "Photos & PDFs" tab on the far right, and PDF documents for the five regions are available for download. You can also directly download the PDFs through the links below.

<https://secure.in.gov/apps/dnr/shaard/r/e863b/N/Calumet.pdf>

https://secure.in.gov/apps/dnr/shaard/r/e863c/N/Falls_of_the_Ohio.pdf

https://secure.in.gov/apps/dnr/shaard/r/e863d/N/Indianapolis_Metro.pdf

https://secure.in.gov/apps/dnr/shaard/r/e863e/N/Vanderburgh_County.pdf

https://secure.in.gov/apps/dnr/shaard/r/e863f/N/Vigo_County.pdf

DHPA reports that eventually these forms will be augmented by newer county surveys that will have official Indiana Historic Sites and Structures Inventory (IHSSI) forms. The following counties already have post-war IHSSI data available in SHAARD: Adams, Allen, Bartholomew, Clark, Daviess, Franklin, Gibson, Greene, LaGrange, Martin, Monroe, Steuben, Warrick, and Wells. The IHSSI data coupled with the new windshield survey forms provides a broad sampling of data regarding housing in the 1940-1973 period for Indiana.

Please contact the DHPA staff directly with any general questions regarding the windshield forms.

If you have questions about evaluating post-war neighborhoods for an INDOT or LPA project, please contact:

History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov

And

LPA Program Administrator at 317-234-0142 or aross3@indot.in.gov

HBAA Information and Subsequent Environmental Documents

The Cultural Resources Office staff and Environmental Policy staff have noticed inconsistency in carrying forward Purpose and Need (P&N) Statements, descriptions of alternatives, and analysis of alternatives from

the Historic Bridge Alternatives Analysis (HBAA) document to other documents in the environmental process, such as Section 106 800.11 Documentation and CE documents. Please be sure your project team carries forward the P&N and other information, which has been reviewed by CRO, NEPA, and Bridge staff, from the HBAA document into the subsequent environmental documents. If nothing has changed, cutting and pasting the information is the easiest route (with minor format changes due to reference location changes). It is understood that minor changes may occur as the project develops, but deviations that are not minor could require reopening the Section 106 process.

If you have any questions about HBAA's and subsequent environmental documents, please contact:

Historic Bridge Specialist Mary Kennedy at 317-232-5215 or mkennedy@indot.in.gov

And

Environmental Policy Team Lead Brandon Miller at 317-234-5108 or bramiller1@indot.in.gov

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From: [Indiana Department of Transportation](#)
To: INDOT-Cultural Resources Office-Updates
Subject: Tuesday, June 23, 2020 3:47:17 PM
Date:

Greetings!

INDOT-CRO has updates on two items:

2nd INDOT-CRO Virtual Brown Bag Session

INDOT-CRO is hosting another virtual brown bag session on July 15 at 12:00pm (EST).

We will be discussing topics related to the intersectionality of NEPA and Section 106- including:

- Purpose and Need- we'll discuss tips and suggestions for making an effective purpose and need
- Public Involvement during Covid-19-Examples of strategies for holding public hearings/meetings
- Other topics as time permits

If you have already requested participation in the previous virtual brown bag session, then no further action is needed. If you did not previously make a request, you can do so by sending an email to Anthony Ross: ARoss3@indot.in.gov and Patrick Carpenter: pacarpenter@indot.in.gov. We'll add you to the list and make sure you receive an invitation for this virtual brown bag session and future ones as well.

Updated Section 4(f) MOU

The Section 4(f) MOU has been updated (June 2020) to clarify that the MOU also applies to projects that fall under the list of minor projects in the Minor Project Programmatic Agreement (MPPA). As a reminder, the Section 4(f) MOU establishes a programmatic approach for FHWA's determination of Section 4(f) de minimis use for historic properties. The updated MOU is available here- [https://www.in.gov/indot/files/section%204\(f\)%20MOU_2020_06%20signed.pdf](https://www.in.gov/indot/files/section%204(f)%20MOU_2020_06%20signed.pdf) and is attached for easier reference.

If you have any questions about application of the Section 4(f) MOU for current projects please contact:

Cultural Resources Manager Anu Kumar at 317-234-5168 or akumar@indot.in.gov

And

Environmental Policy Manager, Ron Bales at 317-234-4916 or rbales@indot.in.gov

- [section 4\(f\) MOU_2020_06 signed.pdf](#)

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From: [Indiana Department of Transportation](#)
To: Courtesy Copy: INDOT Cultural Resources Office-100% State Funded Project Guidance
Subject: Wednesday, June 10, 2020 9:16:58 AM
Date:

Greetings!

In response to inquiries we've received regarding CRO's review of 100% state funded projects please see below for guidance.

CRO only needs to review projects that:

*Require acquisition of right-of-way; or
Do not fit within the project types covered under Category A of the Minor Projects Programmatic Agreement (MPPA)*

If either of these conditions apply, then the project should be submitted to CRO for review. In these cases, submit the District Submission Form for CRO Review of 100% State Funded State Projects-available here: <https://www.in.gov/indot/crm/2341.htm>.

Thank you.

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From: [Indiana Department of Transportation](#)
To: [Carpenter, Patrick A](#)
Subject: INDOT-Cultural Resources Office-Virtual Brown Bag Session
Date: Thursday, May 21, 2020 3:03:40 PM

Greetings!

INDOT-CRO is hosting a virtual brown bag session on **June 10 at 11:30am** to connect with our Section 106 practitioner community and anyone involved or affected by Section 106 projects (project sponsors, project managers, consulting parties, anyone!) to share experiences and strategies for working through Section 106 during the COVID-19 pandemic. CRO will also provide the latest Section 106 updates, especially those related to changes brought by COVID-19. Additionally, we'll make time for any general Section 106 topics. Questions to CRO and other participants are encouraged.

This is a relaxed, open meeting-our primary goal is connecting and sharing! Bring your lunch and join us for a virtual get together. Pets are encouraged to participate also.

If you are interested in participating in this virtual brown bag session , please send an RSVP by **June 3** to Anthony Ross: ARoss3@indot.in.gov and Patrick Carpenter: pacarpenter@indot.in.gov. If you have any general Section 106 questions you want CRO to discuss at the session, please direct those to Anthony or Patrick.

Ahead of the meeting we will send an invitation with specific meeting log-in instructions.

We hope you can join us!

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From: [Indiana Department of Transportation](#)
To: [Carpenter, Patrick A](#)
Subject: INDOT-Cultural Resources Office-FHWA-INDOT Modified Tribal Consultation Procedures-Update
Date: Wednesday, May 20, 2020 1:27:34 PM

Good afternoon,

As an update to our previous guidance regarding tribal consultation procedures, we want to clarify that Early Coordination Letters (ECL) should still be attached to consulting party ECL emails. Attaching the ECL to the emails provides the easiest way for consulting parties to review the ECL.

Please see attached the updated procedures reflecting this guidance.

Again, please let your CRO reviewer know if you have any questions regarding tribal reviews and timelines on your projects.

- [FHWA-INDOT Modified Tribal Consultation Procedures_Final.docx](#)

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From: [Indiana Department of Transportation](#)
To: [Carpenter, Patrick A](#)
Subject: INDOT Cultural Resources Office-FHWA-INDOT Modified Tribal Consultation Procedures
Date: Monday, May 11, 2020 10:06:05 AM

Good morning,

Due to the COVID-19 pandemic, many tribal offices are closed and resultingly those tribes are not able to participate as consulting parties in the Section 106 process. Therefore, FHWA and INDOT have developed procedures to address tribal consultation while tribal offices may be closed.

From this point forward, please follow the procedures outlined in the attached FHWA-INDOT Modified Tribal Consultation Procedures. These procedures are in effect until such time the tribal offices have reopened and have commenced their Section 106 reviews.

For more information regarding tribal consultation of Section 106 reviews during the COVID-19 pandemic, please refer to the ACHP's recent guidance: <https://www.achp.gov/digital-library-section-106-landing/section-106-and-coronavirus-impacts>

Please let your CRO reviewer know if you have any questions regarding tribal reviews and timelines on your projects.

- [FHWA-INDOT Modified Tribal Consultation Procedures_Final.docx](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-Tribal Consultation Updates
Date: Thursday, April 23, 2020 4:01:12 PM

Good afternoon,

We are sharing an update regarding Tribal consultation:

Please make sure to invite the Shawnee Tribe to become a consulting party on all Section 106 Early Coordination Letters (ECL) from this point forward. The Shawnee Tribe has expressed interest in all Indiana Counties.

Remember to refer to the Tribal Contacts on our website when preparing project ECLs-https://www.in.gov/indot/files/Tribal%20Contacts%20for%20Website_April2020.pdf. Updates to the Tribal Contacts list may occur without a listserv announcement, so please check each time when preparing the ECL.

The ACHP recently released guidance on impacts from the coronavirus (COVID-19) outbreak on Section 106 reviews. While the ACHP's reviews should not be affected, our Tribal consulting parties may not be able to participate in consultation. In that case, the ACHP has directed that Section 106 deadlines will be paused if the Tribes are unable to carry out their Section 106 duties and statutory rights during this time. Please let your CRO reviewer know if you have any questions regarding Tribal reviews and timelines on your projects. Please see the ACHP's full message here:
<https://www.achp.gov/digital-library-section-106-landing/section-106-and-coronavirus-impacts>.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Historic Bridge Marketing Updates: TEST
Date: Wednesday, April 22, 2020 9:31:44 AM

Good morning,

Please see below for new requirements for historic bridge marketing signs, effective immediately. For any signs already in place, no changes are required. For all signs yet to be installed, the following language **must be included** on the signs:

This is a historic bridge that may be available for reuse. The status of the bridge is currently "pending," meaning its future is undetermined as the Section 106 review process is on-going. Depending on the outcome of Section 106 consultation, interested parties may be able to acquire the bridge. For more information, please visit <https://www.in.gov/indot/2532.htm> or contact: [insert contact name, phone number, and/or email address].

This new requirement is a result of recent conversations between FHWA, SHPO, and INDOT staff to address concerns expressed by consulting parties that some elements of the marketing procedures appear to predetermine bridge replacement. Incorporation of this language into the marketing signs provides a consistent message across all forms of historic bridge marketing. As part of this update, the historic bridge marketing legal notice template and the bridge marketing website data form have been revised and are linked below. Please use these revised documents effective immediately.

Those involved in the project development process for a historic bridge are reminded that the allowance of marketing activities to commence does not constitute approval of a bypass or replacement alternative. A preferred alternative is not developed until the preparation of the Historic Bridges Alternatives Analysis (HBAA), and final approval of the HBAA and preferred alternative does not occur until FHWA approval of the environmental document.

The relevant chapters of the Cultural Resources Manual and other historic bridge guidance documents have been updated to reflect the new signage requirement and will be available on INDOT's website soon. Please contact Historic Bridge Specialist Mary Kennedy at 317-232-5215 or mkennedy@indot.in.gov with any questions.

- [Blank_Bridge_Marketing_Website_Data_FormApril2020.docx](#)
- [Historic_Bridge_Marketing_Legal_Notice_TemplateApril2020.docx](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: DHPA (SHPO) Section 106/State Review Submittals-Update
Date: Wednesday, April 01, 2020 8:56:57 AM

Good afternoon. We hope everyone is staying healthy.

Please see below a slightly updated message from DHPA regarding their document submittal policy. Please see the bold and highlighted sentence for the update.

In further consultation with DHPA regarding FHWA/INDOT project submittals, if it is not possible to send a hard copy at this time, then DHPA will accept electronic email copies as formal submittals under the following conditions:

- Documents should be submitted as PDFs.
- For documents over 35 MB, IN SCOPE is acceptable. In these cases, attach the DHPA submittal form and include IN SCOPE directions. One exception-archaeology reports should always be attached.
- DHPA does not consider being cc'd on emails with other consulting parties as a formal submittal. Please send submittals directly to DHPA, specifically to Miriam Burkett at mburkett@dnr.in.gov.
- Hard copies should be provided to DHPA for their records as soon as feasible.
- CC the relevant CRO reviewer(s) on all emails to DHPA.

DHPA's review begins when they receive the electronic copy with PDFs or the completed hard copy in the office. Please contact the relevant CRO reviewer if you have any questions.

*With the encouragement to work remotely to the greatest extent possible, DHPA staff will be working from home the majority of the next few weeks or longer. We will continue to process paper hard copy submissions and mail as received; however, this effort could be hampered in the interim period by mandatory actions beyond our control. Starting today we request that all submissions be provided in **BOTH electronic and paper copies**. For the electronic copy, please send it to Miriam Burkett at mburkett@dnr.in.gov. The paper hard copy of the submission can be mailed as usual to: 402 W. Washington Street, Room W274, Indianapolis, IN 46204. For State and National Register nominations, continue to follow standard procedures.*

The Review Request Submittal, Application for Certificate of Approval (state project) and other review forms can be located on our website at: <https://www.in.gov/dnr/historic/>

*We request that the electronic copy of the review submission include the appropriate form(s). Acceptable format for the attached documents, reports, photos, plans is Portable Document Format (PDF). Please note that there is a 35 MB size limit for the electronic email copy of the submission. If your submittal is larger than 35 MB, try to minimize or reduce the size or quality. If necessary, the submission may also be split into two or more emails. For each message, be sure to reference in your subject line (1 of 2, 2 of 3, etc., if sending more than one email for a single review). Photos, maps, plans or other drawings/ graphics shall also be in PDF format and COLOR if possible. Please do not send each photograph as a separate file. If a different format is necessary for a particular type of review, we will contact you. Continue to submit structures and archaeological information as separate reports. These reports can be attached to the same email message if size allows, but we ask that there be one PDF of the Historic Property Report AND a separate PDF for the Archaeology Report. **If the collective review materials are too large to reasonably be transmitted via email, we will continue to review based on the hard copy alone.***

Thank you for your cooperation and patience as we adjust to some changes in our work processes. Please stay safe and healthy!

Chad Slider

Assistant Director for Environmental Review
Indiana Department of Natural Resources
Division of Historic Preservation & Archaeology
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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-CRO-Recommended Email Submission Template
Date: Monday, March 16, 2020 12:22:47 PM

Good afternoon,

In order to further facilitate project reviews, INDOT-CRO has developed an optional template for use by consultants. A recommended email submission template has been developed that consultants can utilize when submitting project documents for review for the first time to INDOT-CRO (ECL, MPPA submission). It can also be used for subsequent submittals (HPR, archaeology report, etc.), but is especially helpful if any of the project information has changed since the previous submittal. The use of this template is optional at this time. However, it is intended to be a tool that will ensure the relevant information is routed to the appropriate staff as early in the process as possible, which should benefit the entire project team.

The template is attached and can be found at: <https://www.in.gov/indot/crm/2341.htm>.

- [CROEmailSubmissionTemplate-2020-03-11.pdf](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Updated Minor Projects PA Guidance-New Right-of-Way
Date: Wednesday, March 11, 2020 10:52:24 AM

Good morning,

In order to clear up some misunderstanding of the Minor Projects PA and misapplication of Category A work types, INDOT-CRO is providing the following guidance:

All projects requiring new right-of-way acquisition, but otherwise meeting the conditions of any MPPA Category, must be submitted to INDOT-CRO using the MPPA Submission Form (Section 1). INDOT-CRO will determine whether Category A or B is applicable and either respond with an email--if Category A--or with a completed MPPA Determination Form, if Category B. Though new right-of-way may consist of previously disturbed soils, CRO is entrusted to review its acquisition to ensure there are no archaeological or 4(f) resources.

Part II, Chapter 3 of the Cultural Resources Manual (Minor Projects Programmatic Agreement) and the INDOT CRO MPPA Submission Form and Flowchart for Category B Projects have been revised to require CRO's review of projects in which new right-of-way is to be acquired.

INDOT-CRO does not need to review projects that are limited to the existing road right-of-way and meet the conditions of Category A work types. Questions regarding Category A applicability in these situations should still be directed towards the appropriate INDOT District environmental staff.

The revised MPPA Submission Form and Flowchart is attached.

Any questions regarding the updated guidance should be directed towards Archaeology Team Lead Shaun Miller at 317-233-6795 or smiller@indot.in.gov or History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov.

- [MPPA_Submission_Form_and_Flowchart_RevisedFebruary2020.docx](#)

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From: [Indiana Department of Transportation](#)
To: Section 4(f) MOU-For Historic Properties
Subject: Monday, January 13, 2020 12:05:10 PM
Date:

Good afternoon!

INDOT is pleased to announce the execution of a Memorandum of Understanding (MOU) regarding Section 4(f) between FHWA-IN Division, IN SHPO and INDOT. The Section 4(f) MOU establishes a programmatic approach for FHWA's determination of Section 4(f) de minimis use for historic properties. Please see the Section 4(f) MOU attached.

In summary, the Section 4(f) MOU stipulates that FHWA intends to determine Section 4(f) de minimis use on historic properties for projects in which SHPO has concurred with a finding of "No Adverse Effect" or "No Historic Properties Affected." The Section 4(f) MOU satisfies the notification requirements specified in 23 CFR 774 for all projects where there is a determination of "No Adverse Effect" or that there are "No Historic Properties Affected" associated with a Section 4(f) historic property except those that are also National Historic Landmarks (NHLs). As a result, FHWA will not have to individually approve each Section 4(f) de minimis determination on historic properties through CE document review except in the case of NHLs. In effect, the Section 4(f) MOU will reduce FHWA's review of CE documents that had previously required FHWA's approval of the Section 4(f) de minimis determination for historic properties.

Please keep in mind:

- The Section 4(f) MOU only pertains to de minimis use(s) on historic properties. No other Section 4(f) properties are included under this MOU.
- The Section 4(f) MOU will not affect the Section 106 consultation process. Section 106 forms will be updated in the near future to recognize the Section 4(f) MOU.

INDOT CRO and Environmental Policy will be releasing updated forms and guidance as appropriate to reflect the execution of the Section 4(f) MOU. In the meantime, if you have any questions about application of the Section 4(f) MOU for current projects please contact:

Cultural Resources Manager Anu Kumar at 317-234-5168 or akumar@indot.in.gov
And
Environmental Policy Manager, Ron Bales at 317-234-4916 or rbales@indot.in.gov

- [Section 4\(f\) MOU.pdf](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Updated Section 106 Forms and Submittal Protocol Reminders
Date: Monday, November 04, 2019 3:13:19 PM

Good afternoon,

INDOT's Cultural Resources Office (INDOT-CRO) has several announcements/reminders:

Updated Section 106 Forms

INDOT-CRO has updated three forms related to making Section 106 findings of effect and preparing the accompanying Section 106 documentation. The forms have been updated to include specific guidance for incorporating information for historic bridge projects. Additionally minor updates have been made throughout the forms to provide clarity.

The updated forms can be found in the links below and on our website (<https://www.in.gov/indot/crm/2341.htm>).

- [October 2019 Sample format for a Section 106 recommendation](#)
- [October 2019 No Historic Properties Affected Finding Documentation](#)
- [October 2019 No Adverse Affect or Adverse Affect Finding Documentation](#)

Submittals to INDOT-CRO

To ensure submittals are routed to the proper staff as quickly as possible, please remember to adhere to the following protocols. We are also asking that you now indicate in the subject line of your email if you're submitting an LPA or historic bridge project.

- Send all review requests to Archaeology Team Lead Shaun Miller (smiller@indot.in.gov) and History Unit Team Lead Susan Branigin (sbranigin@indot.in.gov) and cc CRO Manager Anuradha Kumar (akumar@indot.in.gov).
- For LPA projects (including Community Crossings and Local Trax reviews) add LPA Program Administrator Anthony Ross (aross3@indot.in.gov) as a cc. Also, please indicate in the subject line that it is an LPA project.
- For historic bridge projects add Historic Bridge Specialist Mary Kennedy (mkennedy@indot.in.gov) as a cc. Also, please indicate in the subject line that it is a historic bridge project.

Historic Bridge Alternatives Analysis (HBAA) Submittals-ERMS

We have been having issues with the proper file naming convention not being used for ERMS for HBAA submittals. When this occurs, documents are not always routed to the appropriate staff, which can cause significant delays in review time. A link to all project file naming conventions can be found here: <https://www.in.gov/dot/div/contracts/design/dmforms/EdDoc103-02-02NamingConventions.pdf>. In order to readily identify HBAA files within ERMS, the following naming convention should be used: *ENV DraftHBAA 0000000 for Bridge Services*. Even though the HBAA serves as the bridge inspection (bridge scoping) report for historic bridges, please do not use the "BrInsp" naming convention. Using the ENV HBAA naming convention signifies that both Bridge and CRO staff will review the document.

For any questions please contact History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov or Archaeology Team Lead Shaun Miller at 317-233-6795 or smiller@indot.in.gov or Historic Bridge Specialist Mary Kennedy at 317-232-5215 or mkennedy@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-Consulting Party and Transmittal Letter updates
Date: Thursday, September 26, 2019 2:26:55 PM

Good Afternoon!

Please see below for updates from INDOT's Cultural Resources Office (INDOT-CRO):

Historic Bridges Consulting Parties

INDOT's Cultural Resources Office (INDOT-CRO) has identified three additional consulting parties to invite on all historic bridge projects moving forward. Effective immediately, for all projects for which early coordination has not yet been sent out, these three entities should be added to the consulting party list:

- Historic Hoosier Bridges
- [Historicbridges.org](#)
- Historic Bridge Foundation

Part II, Chapter 4 of the Cultural Resources Manual has been updated with this information. These three entities are currently reviewing information for projects already in the consultation process, and could make a request to INDOT-CRO to become a consulting party for specific ongoing projects. If a request is made, INDOT-CRO will reach out with appropriate guidance to the consultant team for that project. Contact information for each entity is available from INDOT-CRO staff.

Please contact Historic Bridge Specialist Mary Kennedy at 317-232-5215 or mkennedy@indot.in.gov for the contact information or with any other questions.

Section 106 Report Distribution Letter Template Updates

INDOT-CRO has updated its [Section 106 Report Distribution Letter Template](#). The template can be used for most post-ECL correspondence in instances when a transmittal letter is needed, including distribution of HPRs, archaeology reports, HBAAs, historic bridge plan transmittals, effects reports, and 800.11 documentation. The template provides guidance for inviting additional consulting parties, responding to consulting party comments/questions, and including appropriate attachments. Other minor revisions have been made.

For any questions please contact History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov or Archaeology Team Lead Shaun Miller at 317-233-6795 or smiller@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To: [Carpenter, Patrick A](#)
Subject: INDOT-Cultural Resources Office- CRM Chapter Updates and New GIS Requirements
Date: Thursday, August 29, 2019 12:22:21 PM

Good Afternoon,

INDOT's Cultural Resources Office (INDOT-CRO) is pleased to provide updates to our Cultural Resources Manual (CRM) that provide additional guidance and efficiencies to the FHWA/INDOT Section 106 process. Please see below for a brief summary of Chapter updates:

Part IV Chapters 1- 3: Historic Bridges

- **Chapter 1:** Overview of Historic Bridges Program
 - Minor edits and clarifications.
- **Chapter 2:** Historic Bridge Project Development Process
 - Major revisions to reflect the current project development process incorporating the Historic Bridge Alternative Analysis (HBAA) process to provide consistency with Design Memorandum 18-02.
 - All three plan reviews specified in the Historic Bridges PA (approx. 30%; approx. 60%; final) MUST be completed before approval of the Environmental Consultation Form (ECF) can occur.
 - FAQ Appendix includes revisions and clarifications to many previous questions and answers/adds several new questions and answers.
 - Examples of marketing signs in Appendix.
 - Examples of plan submittal transmittal letters in Appendix.
- **Chapter 3:** Procedures for Public Hearings under the Historic Bridges PA
 - Minor edits and clarifications.
 - All originally invited consulting parties should receive hearing notification.

Shapefiles for LPA Projects

- The History Unit will now require GIS polygon shapefiles or KMZ files (shapefiles preferred) for all submissions, including submissions for LPA-sponsored projects.
 - Shapefiles should use "NAD_1983_UTM_Zone_16N" projected coordinate system.
 - For projects submitted under the MPPA, a project area shapefile should be submitted.
 - For projects submitted for full Section 106, a project area shapefile should be submitted along with the ECL and the following additional shapefiles should be submitted with the Historic Property Report: a polygon shapefile for the APE and polygon shapefiles for any properties that are being recommended eligible for the NRHP. **If an ECL was submitted prior to this updated guidance and a project area shapefile was not submitted to INDOT-CRO, the project area shapefile should be submitted with the HPR.**
 - All shapefiles should contain the following text attribute field: DES_NO. The project des. no. should be entered in this field.
- In order to reflect the above changes, revisions have been made to the MPPA Submission Form and Flowchart as well as **Part 2 Chapter 4** and **Part 2 Chapter 6** of the CRM.
- Beginning Monday, September 9th, INDOT-CRO will return any submissions for LPA-sponsored projects that do not include the above shapefiles.

Other Updates

- **Part 1 Chapter 3** of the CRM has been updated to reflect staff changes.
- Other revisions to **Part 2 Chapter 4**
 - The local Chamber of Commerce should be added to the list of consulting parties in instances when a project takes place within a downtown commercial historic district.
 - When a consultant submits an ECL to INDOT-CRO they must provide the reason that the

project cannot meet the conditions of the MPPA.

The Cultural Resources Manual updates are now available on our website: <https://www.in.gov/indot/crm/>. Please contact Historic Bridge Specialist Mary Kennedy at 317-232-5215 or mkennedy@indot.in.gov or LPA Program Administrator Anthony Ross at 317-234-0142 or aross3@indot.in.gov with any questions.

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From: [Indiana Department of Transportation](#)
To:
Subject: Historic Bridge Alternatives Analysis-New Performance Type-Consultant Performance Evaluation
Date: Monday, June 24, 2019 1:00:28 PM

Good afternoon!

A new performance type has been added to the PSCS Consultant Performance Evaluation application for Historic Bridge Alternatives Analysis. Evaluations will be performed utilizing this new performance type effective Friday, June 21, 2019. The evaluations will not count toward RFP selection scoring at this time until enough data has been collected.

Attached is the Performance Criteria Report for your review.

For questions about the criteria or approved evaluations, you may contact Mary Kennedy at (317) 232-5215 or at mkennedy@indot.in.gov.

For questions about the PSCS Consultant Performance Evaluation application, you may contact Sherri Koch at (317) 232-8362 or at skoch@indot.in.gov.

- [Historic Bridge Criteria Report.pdf](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-CRO-Additional Guidance for New Section 106 ECL Procedures
Date: Monday, June 03, 2019 3:03:12 PM

Good afternoon!

INDOT's Cultural Resources Office (INDOT-CRO) is providing additional guidance regarding Section 106 Early Coordination Letter (ECL) preparation and distribution. As a reminder-as of June 1, 2019, all Section 106 ECLs must be submitted prior to the initiation of above-ground and archaeological surveys.

The early submission of ECLs will not add time to the Section 106 timeline, but it will generally shorten the Section 106 process by:

- Reducing unnecessary work-such as the preparation of an HPR or archaeology report when the MPPA would apply.
- Allowing CRO to provide assistance during the identification phase and flagging problematic projects.
- Providing Tribes and other consulting parties with an opportunity to indicate any properties or locations of concern before the HPR or archaeology report is completed.

When preparing Section 106 ECLs keep in mind that:

- ECLs should be prepared at the early stages of project development, soon after the notice to proceed.
- ECLs do not have to be prepared by a Section 106 QP.
- A preliminary purpose and need statement should be provided with the ECL. The purpose and need statement can evolve and be updated as the project develops.

The ECL template has been updated to reflect this new policy. A new template, the Section 106 Report Distribution Letter, should be used for distribution of HPRs, archaeology reports, HBAAAs, and other reports. All correspondence templates can be found at <https://www.in.gov/indot/crm/2341.htm>.

When submitting ECLs and other Section 106 documents for CRO review, please adhere to the following protocols:

- Send all review requests to Archaeology Team Lead, Shaun Miller (smiller@indot.in.gov) and History Unit Team Lead Susan Branigin (sbranigin@indot.in.gov) and cc CRO Manager, Anuradha Kumar (akumar@indot.in.gov).
- For LPA projects (including Community Crossings and Local Trax reviews) add LPA Program Administrator Anthony Ross (aross3@indot.in.gov) as a cc.
- For historic bridge projects add Historic Bridge Specialist Mary Kennedy (mkenedy@indot.in.gov) as a cc.

For any questions please contact History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov or Archaeology Team Lead Shaun Miller at 317-233-6795 or smiller@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-Staff Organizational Changes
Date: Thursday, May 16, 2019 11:17:49 AM

Good morning!

INDOT'S Cultural Resources Office (INDOT-CRO) is pleased to announce organizational changes that will help facilitate review and approval of Section 106 for INDOT and LPA projects.

- Anthony Ross has transitioned into the newly created Local Public Agency (LPA) Program Administrator for CRO. Anthony will be the primary CRO reviewer for major LPA projects, Community Crossings and Local Trax projects. While Anthony's focus will be on major LPA projects, he will continue to complete the reviews of INDOT projects that he has already begun and will continue to provide support on other INDOT projects as needed.
- With Anthony's transition, Kelyn Alexander will be assuming Section 106 responsibilities for Vincennes District projects. Clint Kelly will be assuming Section 106 responsibilities for Seymour District projects.

Contact Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov for any questions.

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From: Monday, May 13, 2019 11:32:26 AM
To:
Subject:
Date:

Good morning,

INDOT's Cultural Resources Office (INDOT-CRO) is providing a reminder of our new Section 106 ECL procedures beginning on June 1, 2019. Please see below for a summary of the ECL process changes:

- **Beginning 6/1/2019**, all Section 106 Early Coordination Letters (ECL) must be submitted prior to the initiation of above-ground and archaeological surveys. Preparing and submitting an ECL to CRO should be the first step that a consultant takes after they determine that the project needs full Section 106 consultation (i.e. it does not meet the conditions of the MPPA) and they identify potential consulting parties. Consultants should begin preparing Historic Property Reports (HPRs) and archaeological reports after they have submitted the ECL to INDOT-CRO, but they should not submit a report to INDOT-CRO until after the 30-day ECL comment period has ended. This will allow potential consulting parties--especially Tribes--to indicate if there are properties or locations of concern in the project area before an HPR or archaeological report is completed. **The early submission of ECLs will generally shorten Section 106 timelines by allowing CRO to provide assistance during the identification phase and flag problematic projects early on.**
- During the transitional period, from the date of this listserv announcement to 6/1/2019, we encourage you to follow the above guidance if you have not already submitted your Section 106 ECL on your active projects.
- The ECL template has been updated to reflect this new policy. A new template, the Section 106 Report Distribution Letter, should be used for distribution of HPRs, archaeology reports, HBAAAs, and other reports. All correspondence templates can be found at <https://www.in.gov/indot/crm/2341.htm>.
- The new ECL policy is further explained in revisions to the following Cultural Resource Manual (CRM) chapters: Pt. II Ch. 4, Pt. II Ch. 6, and Pt. II Ch. 7.

Please see the updated Section 106 Consultation Steps for Consultants (<https://www.in.gov/indot/files/INDOT-CRO%20Consultation%20Steps.pdf>) for quick reference.

For any questions please contact History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov or Archaeology Team Lead Shaun Miller at 317-233-6795 or smiller@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT-Cultural Resources Office-Updated Guidance and Revised CRM chapters
Date: Wednesday, March 20, 2019 11:02:42 AM

Good morning,

INDOT's Cultural Resources Office (INDOT-CRO) is pleased to provide updates to our Cultural Resources Manual that provide additional guidance and efficiencies to the FHWA/INDOT Section 106 process. Please see below for a brief summary of chapter updates and corresponding process changes:

New ECL and report distribution guidance:

See updated Section 106 Consultation Steps for Consultants (<https://www.in.gov/indot/files/INDOT-CRO%20Consultation%20Steps.pdf>)

- **Beginning 6/1/2019**, all Section 106 Early Coordination Letters (ECL) must be submitted prior to the initiation of above-ground and archaeological surveys. Preparing and submitting an ECL to CRO should be the first step that a consultant takes after they determine that the project needs full Section 106 consultation (i.e. it does not meet the conditions of the MPPA) and they identify potential consulting parties. Consultants should begin preparing Historic Property Reports (HPRs) and archaeological reports after they have submitted the ECL to INDOT-CRO, but they should not submit a report to INDOT-CRO until after the 30-day ECL comment period has ended. This will allow potential consulting parties--especially Tribes--to indicate if there are properties or locations of concern in the project area before an HPR or archaeological report is completed. **The early submission of ECLs will generally shorten Section 106 timelines by allowing CRO to provide assistance during the identification phase and flag problematic projects early on.**
- During the transitional period, from the date of this listserv announcement to 6/1/2019, we encourage you to follow the above guidance if you have not already submitted your Section 106 ECL on your active projects.
- The ECL template has been updated to reflect this new policy. A new template, the Section 106 Report Distribution Letter, should be used for distribution of HPRs, archaeology reports, HBAAs, and other reports. All correspondence templates can be found at <https://www.in.gov/indot/crm/2341.htm>.
- The new ECL policy is further explained in revisions to the following Cultural Resource Manual (CRM) chapters: Pt. II Ch. 4, Pt. II Ch. 6, and Pt. II Ch. 7.

Including SHPO on emails from consultants to non-tribal consulting parties:

- Going forward, INDOT-CRO asks that consultants include SHPO on all notification emails to non-tribal consulting parties (ECL, post-ECL, 800.11, etc.). Emails should be sent to the assigned SHPO reviewers, if the project has been assigned to a reviewer. If a project has not been assigned to a SHPO reviewer yet, emails should be sent to DHPA's Assistant Director for Environmental Review. **Please note, SHPO still requires hardcopies of all Section 106 documents for review.**
- Please note that this not a new rule, but rather a clarification of a rule that has been in place since the Tribal MOU went into effect, i.e. that the consultant should send email notifications to all non-tribal consulting parties, which would include SHPO since they are a non-tribal consulting party.

Revised guidance for identifying consulting parties can be found in updated CRM Pt. II. Ch. 4.

Part II Chapter 7 Historic Property Identification and Evaluation-Archaeology was updated to:

- Replace the outdated record check report policy with guidance on preparing Archaeological Assessments during early coordination;
- Revise and update standard Phase Ia methodologies and provide best practices;
- Update Phase Ia and Phase II report review and distribution policy; and
- Provide links to Roadway Treatment Plan and AASHTO Guide to Incorporating Geophysical Remote Sensing in Transportation Archaeological Investigations.

The Cultural Resources Manual updates are now available on our website- <https://www.in.gov/indot/crm/>

Please contact History Unit Team Lead Susan Branigin at 317-232-2969 or sbranigin@indot.in.gov or Archaeology Team Lead Shaun Miller at 317-233-6795 or smiller@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Updated Archaeology Guidance
Date: Wednesday, March 13, 2019 11:08:25 AM

Good morning,

We are making a correction to the announcement sent on March 11 regarding the GIS shapefile instructions. See the revised section highlighted below.

Archaeology Shapefiles

The INDOT-CRO Archaeology Unit now requires consultants to attach separate GIS polygon shapefiles of project and survey areas and site boundaries when submitting reports for our review. Shapefiles should use "NAD_1983_UTM_Zone_16N" projected coordinate system. Project and survey area files should contain the following *text* attribute field: PROJECT_NO. The project designation number should be entered in this field. **Site area files should contain the following *text* attribute field: SITE_NO.** The full state trinomial number should be entered in this field in the format 12-Xx-0123.

If project area and survey area are the same, only one shapefile is needed with polygon depicting the project area. Generally, survey areas should be larger in size than project areas and be drawn as a separate polygon.

Polygons for isolated finds should be represented as a circle with a 0.5 m radius (1 m diameter).

Archaeological Assessment in ECL:

INDOT-Cultural Resources Office is providing additional guidance with regards to the content of the brief archaeological assessment (taking the place archaeological records check reports) included in the body of the Early Coordination Letter for undertakings requiring full Section 106 but limited to work in disturbed soils. Please note that the archaeological assessment must be prepared by a Qualified Professional and should include the following information:

- 1) Name of QP who reviewed the project area
- 2) Results of SHAARD review noting the presence or absence of archaeological resources *within or adjacent* to the project area
- 3) A description of what the project area consists of and ground disturbances visible in desktop review that limit the potential for intact archaeological resources to be present.
- 4) A statement that the project has no potential to impact previously unrecorded or recorded sites within or adjacent to the project area
- 5) A recommendation for no further work;
- 6) Accidental discovery statement.

Example:

With regards to archaeological resources, Jane Doe, an INDOT Qualified Professional archaeologist reviewed the proposed project area and determined that the US 41 HMA Overlay, Preventative Maintenance project will not likely affect archaeological resources due to the project scope and setting. All work will occur in previously disturbed soils, which in the rural portions, consist of the 4-lane divided highway and paved shoulders, raised road berm, median and roadside ditches, lane tapering, and utility easements. Within Muncie, the project area consists of two traffic lanes, turn lanes, curb and curb ramps, sidewalks, storm sewers, cut soils, traffic/pedestrian poles and boxes, and utility easements. The majority of curb ramps within the project area have been previously updated and any work to improve the selected intersection curb ramps will not extend deeper than previous construction of curbs and sidewalks. According to SHAARD, there are no archaeological sites recorded within or adjacent to the project area. Since the proposed project is

confined to repaving US 41 and to excavation work in previously disturbed soils, there are no archaeological concerns and no further work is recommended. However, state law (Indiana Code 14-21-1-27 and -29) requires that if any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earth moving activities, that the discovery must be reported to the Department of Natural Resources within two (2) business days.

Are you covered? When to perform an addendum archaeological survey.

Sometimes the scope of a project changes after the Phase Ia archaeological reconnaissance survey has already been completed, and additional right-of-way (r/w) is needed. When is an addendum archaeological survey necessary, and when can the added r/w be considered to have been covered by the previous survey?

Our usual advice is that we consider additional areas that are less than a standard transect interval in width to fall within the original survey universe. That is, you would typically only need to survey areas of added r/w that extend 15 m or more beyond the original survey limits for shovel probed areas, or that extend 10 m or more for pedestrian survey areas.

However, there are some exceptions to this general guidance:

1) Previously recorded sites

A reduced 5 m survey interval is required within previously recorded archaeological sites. Therefore, if a site was previously recorded within or adjacent to the original survey area and may therefore extend into the new r/w, then the cutoff would be 5 m instead of one standard transect interval. In other words, if the additional r/w extends 5 m or more beyond what was originally tested, then that added area must be surveyed at a 5 m interval per DHPA guidelines.

2) Areas that were not tested during the original survey due to buried utilities or other disturbance

If there is apparently undisturbed, testable land within the new added r/w adjacent to any of those areas, then it must be tested even if it is less than one transect interval in width. For example, if the original survey area was visually inspected because it consisted of a ditch and buried utility corridor, but the new added r/w extends 3 m into agricultural fields or residential yards, then that 3 m wide undisturbed area should be tested.

These general guidelines cover the most common situations, but if you should ever have questions regarding the needs for a particular project, please don't hesitate to contact CRO *prior to conducting any additional survey* and we will be happy to discuss the project specifics.

If you have any questions about content of the archaeological assessment or whether additional archaeological survey is needed after a change in scope, please contact Shaun Miller, INDOT Archaeological Team Lead at smiller@indot.in.gov or 317-233-6795.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office- Historic Bridges Guidance
Date: Monday, March 04, 2019 3:01:25 PM

Good afternoon!

The INDOT-Cultural Resources Office has several announcements related to historic bridges.

Select and Non-Select Bridges now on Indiana Historic Buildings, Bridges and Cemeteries Map

In collaboration with INDOT-CRO, DNR-DHPA has incorporated Select and Non-Select Bridges into the Indiana Historic Buildings, Bridges, and Cemeteries Map (IHBBC Map). On the upper, right hand side of the screen, click on the “Layer List,” and you’ll find a layer is available for both Select and Non-Select Bridges. Each layer must be turned on individually for each type of bridge to be shown in the map. These layers are not displayed by default and must be turned on each time you access the map. These layers are not associated with SHAARD. When you click on the icon, it will show the basic bridge ID information, but there is not a link to learn more from the database – this is informational data only. The IHBBC Map can be accessed here: <https://www.in.gov/dnr/historic/4505.htm>. DHPA’s plan is to add more resource layers to help CRM firms, agencies, and staff when conducting reviews for projects. If you know of other resource layers the map should have, send your ideas to [Jeannie Regan-Dinius](#) at DHPA, and she will see what they can do to make it happen.

Plan Review Requirements

Please be sure to incorporate the plan submittal requirements per the Historic Bridges Programmatic Agreement (HBPA) into the project development process for historic bridge projects receiving federal aid for which the preferred alternative is rehabilitation of the bridge. INDOT has seen issues on many recent projects with the process not being followed for the plan submittals specified in Attachment B of the HBPA at approximately 30% complete, approximately 60% complete, and final plans. Recent conversations with FHWA staff have prompted us to send a reminder that **ALL THREE** of these plan review submittals **ARE REQUIRED** for all projects for which the preferred alternative is rehabilitation of the historic bridge.

For many projects, the design does not progress beyond Stage 1 (approximately 30% complete) plans before environmental document completion. Therefore, the 60% complete & final plan submittals often will occur after the environmental document has been approved. As a result, these plan submittals must be listed as commitments in the environmental document and the Project Commitments Database. These submittals should be completed prior to the submittal of the Environmental Consultation Form (ECF). Per the HBPA, **SHPO has 30 days to comment on each plan submittal**. Before each submittal is sent to SHPO, please send them to INDOT-CRO for review. The submittal should include a cover letter to the SHPO that highlights key changes in the plans from the previous submittal(s), and answers any questions SHPO staff posed in the previous review letter(s). For state-owned bridges, project clearance under state law should also be addressed in the letter as appropriate. Example submittal letters will be incorporated into the Cultural Resources Manual in the future, but until that time, several are available in IN SCOPE when searching for the “Bridge Plan Review” document type (<http://erms.indot.in.gov/Section106Documents/>). To view the entire HBPA, click here: https://www.in.gov/indot/files/Historic_Bridge_ProgrammaticAgreement.pdf.

Historic Bridge Alternatives Analysis (HBAA) Submittals-ERMS

All Historic Bridge Alternatives Analysis (HBAA) documents submitted to INDOT for review must be submitted through ERMS. The file naming convention and abbreviations are essential for locating specific types of submittals within ERMS. Failure to use the proper file naming convention can result in the document not being routed to proper staff, and can cause significant delays in review time. A link to all project file naming conventions can be found here: <https://www.in.gov/dot/div/contracts/design/dmforms/EdDoc103-02-02NamingConventions.pdf>. In order to readily identify HBAA files within ERMS, the following naming convention should be used: *ENV DraftHBAA 0000000 for Bridge Services*.

Please direct any questions about historic bridge projects to Mary Kennedy, Historic Bridge Specialist, at 317-232-5215 or mkennedy@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-New Archaeologist Staff Member
Date: Tuesday, February 26, 2019 11:44:12 AM

INDOT-CRO is very happy to announce the hiring of Patricia Jo (Patty Jo) Korzeniewski as our new Environmental Manager 2-Archaeologist. Patty Jo received her MA in Archaeology and Geography from Valparaiso University in 2015. She brings over 10 years of fieldwork experience in prehistoric archaeology, geophysics, GIS mapping, and museum curation. She has participated in excavations at significant and complex archaeological sites such as Angel Mounds, Buckeye Bend, Morton Village at Dickson Mounds, and Collier Lodge at Baum's Bridge. In addition, Patty Jo has conducted archaeological work in the Caribbean Islands, Hawaii, and Australia. Her wide-ranging experience with remote sensing instruments and software will provide valuable assistance in conducting geophysical investigations. Patty Jo is the INDOT archaeology liaison for the Fort Wayne and Greenfield Districts.

Please join INDOT-CRO in welcoming Patty Jo to our staff at PKorzeniewski@indot.IN.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Section 106 Minor Projects PA Updates
Date: Thursday, February 21, 2019 3:14:05 PM

The INDOT Cultural Resources Office (INDOT-CRO) is pleased to release an update to Appendix A and Appendix B of our Minor Projects Programmatic Agreement (MPPA). Appendix A and B are now dated February 13, 2019. The updated Appendix A and B includes amendments to existing minor project categories and the addition of new categories-Category A-14, B-15 & B-16. The MPPA updates were developed in consultation between FHWA, SHPO, Native American Tribes and INDOT. The MPPA update reflects our continuing efforts to make the Section 106 process more efficient and concentrate our efforts on projects that may have impacts to historic properties.

Implementation of the updated MPPA is effective immediately. We will be updating the Cultural Resources website shortly to include the February 13, 2019 appendix updates. The updated MPPA is attached.

As a reminder, all Category B MPPA requests should always be accompanied by a MPPA Submission Form-<https://www.in.gov/indot/crm/2341.htm>

Please direct any questions to Anuradha Kumar, CRO manager at 317-234-5168 or akumar@indot.in.gov

- [Minor Projects PA with Revised Appendices_February 13, 2019.pdf](#)

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From: [Indiana Department of Transportation](#)
To:
Subject: Environmental Services-Cultural Resources Office-Governor's Summer Intern Opportunities
Date: Tuesday, January 22, 2019 11:24:17 AM

Good morning!

INDOT's Cultural Resources Office has two Governor's Summer Intern positions available for summer 2019:

Archaeology Intern-Job Opening ID: 620928

History Unit Intern-Job Opening ID: 620929

Applications must be received through the state job bank (<http://www.in.gov/spd/careers/>) to be considered. The closing date for applications is February 1, 2019.

Please share with anyone who might be interested! For any questions about the intern positions, please contact Cultural Resources Office Manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Environmental Services-Cultural Resources Office Job Posting
Date: Tuesday, November 13, 2018 10:36:57 AM

Good Morning!

The Cultural Resources Office in the Environmental Services Division of the Indiana Department of Transportation has an opening for an Archaeologist at the Environmental Manager 2 level. The job ID is 619596. Applications must be received through the state job bank (<http://www.in.gov/spd/careers/>) to be considered. The closing date for the application is December 6, 2018.

Please share with anyone who might be interested!

For any questions about the position, please contact Cultural Resources Office Manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To: Courtesy Copy: Post-War Residential Development & Planning Workshop-Registration Open
Subject: Tuesday, October 02, 2018 4:00:09 PM
Date:

This is a courtesy copy of an email bulletin sent by Patrick Carpenter.

This bulletin was sent to the following groups of people:

Subscribers of Cultural Resources or DOT - Environmental Services (2875 recipients)

Please see details below for registering for the Post-War Residential Development & Planning Workshop-sponsored by DNR's Division of Historic Preservation and Archaeology and INDOT's Cultural Resources Office.

Post-War Residential Development & Planning Workshop-Registration Open

Workshop Topic:

Guidance for identifying and evaluating properties following the *Residential Planning and Development in Indiana, 1940-1973 National Register of Historic Places Multiple Property Documentation Form*

Date:

November 8, 2018

Location:

INDOT's Traffic Management Center-Indianapolis, Indiana

Who should attend:

National Register preparers, Section 106 practitioners, government planning and environmental staff

How to register:

Send an email to Patrick Carpenter at pacarpenter@indot.in.gov with name, organization (if any), email and phone number. Please cc Anuradha Kumar at akumar@indot.in.gov on all correspondence. You will receive a confirmation email once registered.

Due to space constraints, we ask that only one representative from each organization register for the workshop. If additional staff would like to attend, please let us know and we'll add these to a waiting list. If room allows, we will begin registering people from the waiting list. A confirmation email will be sent to those registered from the waiting list.

Additional meeting details and location information will be provided after registration.

From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office- Training Opportunities and Historic Roadway Treatment Plan
Date: Monday, September 17, 2018 11:56:15 AM

The INDOT-Cultural Resources Office is pleased to announce training opportunities and a new guidance document regarding historic roadways:

Post-War Residential Development & Planning Workshop

Save the Date: DNR-DHPA and INDOT will be hosting a Residential Development & Planning Workshop in Indianapolis on **November 8**. The workshop will provide guidance for following the *Residential Planning and Development in Indiana, 1940-1973 National Register of Historic Places Multiple Property Documentation Form*. INDOT Qualified Professional consultants are encouraged to attend this workshop to better understand how to adopt the identification and evaluation methods set forth in the MPDF to INDOT Section 106 documentation. DNR or INDOT will be providing more specific workshop details, including exact time and place in the near future.

IN SCOPE Training through INDOT University:

INDOT is offering a free training course on IN SCOPE, our Section 106 electronic coordination website, through INDOT University. The course provides instruction and guidance on using IN SCOPE from different perspectives, from viewers only to consultants checking-in documents. The course is available for free to the Public, Consulting Parties, Tribal Consulting Parties and Consultants. We ask that all consultants who use IN SCOPE complete the course.

If interested in registering for the training, please contact Patrick Carpenter at pacarpenter@indot.in.gov. Please provide your name, agency/organization, mailing address, phone, and e-mail.

Historic Roadway Treatment Plan

The Indiana Department of Transportation, Cultural Resources Office (INDOT, CRO) has developed the following historic roadway treatment plan for use on all INDOT and Local Public Agency (LPA) sponsored projects. The purpose of the plan is to provide guidance for the identification, documentation and evaluation of historic roads within Indiana according to established criteria for above-ground and below-ground resources set forth in the National Register of Historic Places (NRHP) and the Indiana Register of Historic Sites and Structures (IRHSS). This document is intended to address specific issues related to the identification and evaluation of historic roads on Federal Highway Administration (FHWA), INDOT undertakings only. Specifically, this document will assist in accomplishing these goals by providing guidance in three key areas:

- Compliance with federal and state preservation laws and regulations that include the National Historic Preservation Act (NHPA) of 1966; the U.S. Department of Transportation Act of 1966 and Indiana Code (IC) 14-21-1 and 312 IAC 21;
- Development of an efficient, consistent and systematic approach to identify, document and evaluate historic roads listed on or eligible for listing on the NRHP or IRHSS encountered on United States Department of Transportation Federal Highway Administration (FHWA) undertakings or state and local projects within the archaeological and above-ground Area of Potential Effects (APE); and
- Determine which roads in Indiana should be considered historically significant based upon the NRHP/IRHSS Criteria and how these roads will be evaluated in relation to each of the criteria based upon a general contextual framework

The basis of the plan includes the use of a flow chart initiated by the particular road type (above-ground, above-ground in a historic district or below ground [buried]) identified within the Area of Potential Effects as part of cultural resource investigations or as an accidental discovery.

The treatment plan may be accessed on the INDOT-CRO website at <https://www.in.gov/indot/2521.htm> under the Documents heading, titled *Treatment Plan for Historic Roads 2018*.

From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-MPPA Submission Form Update
Date: Thursday, May 24, 2018 11:17:29 AM

Good morning,

Please note that there has been a minor update to the MPPA Submission Form and Flowchart that was sent out last week. When a GIS shapefile is required for a submission, it should include a text attribute field with the title DES_NO. (The previous version had requested a field entitled INDOT_DES_NO). The form has been updated on the CRO website: <https://www.in.gov/indot/crm/2341.htm>.

For any questions please contact CRO manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office- Section 106 Minor Projects PA Submission Form: TEST
Date: Wednesday, May 16, 2018 3:42:34 PM

Good afternoon!

INDOT's Cultural Resources Office (INDOT-CRO) has developed a Section 106 Minor Projects Programmatic Agreement (MPPA) Submission Form to accompany all MPPA Category B submission requests. The MPPA Submission Form includes guidance and a flowchart explaining the MPPA approval process. The MPPA Submission Form will streamline the MPPA approval process - reducing unnecessary and redundant documentation.

The MPPA Submission Form is required to accompany all future MPPA requests. For MPPA requests currently being reviewed or processed, the Submission Form requirement will be waived.

The MPPA Submission Form is attached. It is also available on our Cultural Resources Manual (CRM) website here: <https://www.in.gov/indot/crm/2341.htm>. Please also note that CRM-Part II Chapter 3 has been updated to reflect these updates- https://www.in.gov/indot/crm/files/P2-Chapter_3-Minor_Projects_PA.pdf.

For any questions please contact CRO manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Section 106 Consulting Parties
Date: Tuesday, March 20, 2018 2:29:49 PM

Good afternoon,

A note from INDOT's Cultural Resources Office (INDOT-CRO) regarding Section 106 consulting party identification and coordination.

Please ensure that all three county commissioners within a project's county receive Section 106 Early Coordination. In cases where commissioner emails are not identified, direct the email to the county auditor if known. Where no emails are located, proceed to send a hard copy. Additionally, the relevant city/county highway engineer or superintendent, if those positions exist within the county, shall also be invited to be a Section 106 consulting party. Please consult the latest version of the *Directory of Indiana State, County, City and Town Officials* for city/county contact information: <http://wpvecnltp01.itap.purdue.edu/LTAP/main.php>. A spreadsheet with contact information can be downloaded on the website.

Please note that the email addresses for the chair of the Historic Spans Task Force and Dr. James Cooper, who must be invited to be consulting parties on all projects involving historic bridges, can be obtained by contacting CRO staff.

When submitting the Early Coordination Letter for INDOT-CRO review, please remember to submit the list of invited consulting parties and their emails. This will help save time and effort later in the process.

Please contact CRO manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov if any questions.

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Subject: INDOT Cultural Resources Office-Minor Projects PA-Category A
Date: Wednesday, February 28, 2018 3:47:58 PM

Good afternoon,

In recent months the INDOT-Cultural Resources Office (INDOT-CRO) has been inundated with requests from consultants to approve projects under Category A of the Minor Projects Programmatic Agreement (MPPA). As a reminder, Category A projects are considered minor projects that do not require approval by CRO. When CRO is asked to review Category A projects, it reduces the streamlining features of the MPPA. Therefore, in an effort to streamline the Section 106 process, reduce associated project costs, and focus CRO staff time on projects that have impacts to cultural resources, please adhere to the following guidance:

- Consultant/INDOT engineers, cultural resource and environmental specialists, and project managers can make Category A determinations.
- Section 106 Qualified Professionals are not required to prepare or apply Category A determinations.
- Questions regarding Category A applicability should be directed towards the appropriate INDOT District Environmental staff.
- If there are questions about applying Category A in unique situations or where the level of soil disturbance is unclear, then please continue to direct those to CRO.

Please contact CRO manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov if any questions.

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From: [Indiana Department of Transportation](#)
To:
Subject: INDOT Cultural Resources Office-Policy Change Regarding Archaeological Records Check
Date: Tuesday, January 02, 2018 11:19:25 AM

Happy New Year!

In coordination with the Indiana SHPO, INDOT-Cultural Resources Office is providing notification of a policy change regarding archaeological records checks. Starting January 1, 2018, archaeological records check reports are not required when the proposed work is occurring in disturbed soils. Instead, a brief archaeological assessment prepared by a Qualified Professional archaeologist, explaining that the work occurs in disturbed soils and that no further work is recommended must be included in the body of the Early Coordination Letter. The archaeological assessment will also be summarized in the finding/800.11 once prepared.

If you have any questions about application of the archaeological assessment, please direct those to Shaun Miller, INDOT Archaeological Team Lead at smiller@indot.in.gov or 317-233-6795.

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From: [Indiana Department of Transportation](#)
To: Courtesy Copy: INDOT Environmental Services-Cultural Resources Office Job Posting
Subject: Thursday, December 28, 2017 3:01:04 PM
Date:

This is a courtesy copy of an email bulletin sent by Patrick Carpenter.

This bulletin was sent to the following groups of people:

Subscribers of Cultural Resources or DOT - Environmental Services (2453 recipients)

Good Afternoon!

The Cultural Resources Office in the Environmental Services Division of the Indiana Department of Transportation has an opening for a Historian at the Environmental Manager 2 level. The job ID is 613026. Applications must be received through the state job bank (<http://www.in.gov/spd/careers/>) to be considered. The closing date for the application is January 11, 2018.

Please share with anyone who might be interested! For any questions about the position, please contact Cultural Resources Office Manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov.

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From: [Indiana Department of Transportation](#)
To:
Subject: Environmental Services-Cultural Resources Office Job Posting and Staffing Updates
Date: Tuesday, November 14, 2017 3:18:07 PM

Good afternoon!

CRO Staffing Updates

New History Unit Team Lead

Beginning November 20, 2017, Susan Branigin is the new History Unit Team Lead. Please contact her with general Section 106 questions related to above-ground resources, historic property report submittals, application of the Minor Projects PA, etc. Please send Ms. Branigin all new Section 106 requests starting on November 20, 2017. Her contact information is: sbranigin@indot.in.gov or 317-232-2969.

Historic Bridge Specialist

Mary Kennedy has transitioned into a new position as Historic Bridge Specialist. Please contact her with any questions related to historic bridge projects. Ms. Kennedy will continue to review projects that she has already been assigned as the CRO reviewer until completion of Section 106. Her contact information remains the same: mkennedy@indot.in.gov or 317-232-5215.

Job Posting for Historian-Environmental Manager 2

The Cultural Resources Office in the Environmental Services Division of the Indiana Department of Transportation has an opening for a Historian at the Environmental Manager 2 level. The job ID is 612318. Applications must be received through the state job bank (<http://www.in.gov/spd/careers/>) to be considered. The closing date for the application is November 28, 2017.

Please share with anyone who might be interested!

For any questions about the job posting or other CRO staffing updates, please contact Cultural Resources Office Manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov.

Thank you.

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INDOT-CRO listserv posting up to 10/24/2017.

Tue 10/17/2017 2:25 PM

Good Afternoon!

INDOT's Cultural Resources Office has updated our Section 106 correspondence templates. Specifically, existing Early Coordination Letter (ECL) and ECL email templates have been customized to include Dual Review verbiage, address previous omissions and provide more descriptive language to aid in review by consulting parties. Additionally, new email templates have been created for Post-ECL submissions and Finding/800.11 Documentation submissions. These additional email templates will help provide consistency and reduce confusion by consulting parties.

The new templates are effective immediately. Please review and apply the appropriate template for the corresponding submission type.

The updated templates are attached and will be available on the Cultural Resources Manual website shortly: <http://www.in.gov/indot/crm/2341.htm>.

Please contact CRO manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov if any questions.

Thank you!

- [CP+and+Tribal+ECL+Template with 106 docs 2017-10-16.doc](#)
- [INDOT-CRO+Consultation+Email+Template+-+Finding-800.11+Submission 2017-10-16.doc](#)
- [INDOT-CRO+Consultation+Email+Template+-+Post-ECL+Submissions 2017-10-16.doc](#)
- [CP+and+Tribal+ECL+Template without 106 docs 2017-10-16.doc](#)
- [INDOT-CRO+Consultation+Email+Template+-+ECL+Submission 2017-10-16.doc](#)

Thu 8/24/2017 2:25 PM

The INDOT Cultural Resources Office (INDOT-CRO) is pleased to release an update of Appendix A and B of our Minor Projects Programmatic Agreement (MPPA). Appendix A and B are now dated August 23, 2017. The updated Appendix A and B includes amendments to existing minor project categories and brand new categories. The MPPA updates were developed in consultation between FHWA, SHPO, Native American Tribes and INDOT. The MPPA update reflects our continuing efforts to make the Section 106 process more efficient and concentrate our efforts on projects that may have impacts to historic properties.

Implementation of the updated MPPA is effective immediately. We will be updating the Cultural Resources Manual and Tribal MOU shortly to include the August 23, 2017 appendix updates. In the meantime please make sure to refer to the MPPA version located on the CRO website here:

<http://www.in.gov/indot/files/Minor%20Projects%20PA%20with%20Revised%20Appendices.pdf>-- with Appendix A and B dated August 23, 2017.

Please direct any questions to Anuradha Kumar, CRO manager at 317-234-5168 or akumar@indot.in.gov

Mon 5/15/2017

Good Afternoon,

INDOT's Cultural Resources Office (INDOT CRO), in consultation with the State Historic Preservation Officer (SHPO), has updated our Historic Property Report (HPR) outline to streamline preparation and improve content. The updated HPR outline is effective from this point forward for any HPR submitted for INDOT review.

A summary of significant updates:

- **National Register of Historic Places Evaluations:** Only those properties that the qualified professional has determined warrant an Indiana Historic Sites and Structures Inventory (IHSSI) rating of "Notable" or "Outstanding"-using the IHSSI criteria-will be formally evaluated for the NRHP.
- **Historic Contexts:** Guidance for tailoring historic contexts to the themes most relevant to the built environment in the APE.

For any questions please contact Anuradha Kumar, CRO Manager at akumar@indot.in.gov / 317-234-5168 or Mary Kennedy, History Unit Team Lead at mkennedy@indot.in.gov / 317-232-5215.

Thank you.

Wed 5/10/2017 4:12 PM

Good Afternoon,

With apologies-attachments are now included.

In consultation with Native American Tribes and FHWA, INDOT's Cultural Resources Office has updated our Section 106 consultation procedures that are effective immediately for new document submittals. These updated procedures fulfill INDOT's and FHWA's commitments set forth in the recently executed Tribal Memorandum of Understanding (MOU) between FHWA, INDOT and Native American Tribes and streamline our consultation practices.

Attached are four documents implementing the new procedures and are described as follows

"INDOT-CRO Consultation Steps": Summarizes the updated consultation procedures.

"INDOT-CRO Consultation Email Template": Please use this template for emails transmitting Early Coordination Letters to consulting parties.

“CP and Tribal ECL Template_without_106_docs_2017-04-26”: Please use this template for Early Coordination Letters when HPRs or archaeology reports have not been prepared and will be forthcoming.

“CP and Tribal ECL Template_with_106_docs_2017-04-26”: Please use this template for Early Coordination Letters when HPR and/or archaeology reports have been posted to IN SCOPE.

The Cultural Resources Manual (CRM) will be updated to reflect these changes. In the meantime, please refer to these documents.

If you have questions on these updated Section 106 procedures, please contact Shaun Miller, Archaeology Team Lead at 317-233-6795 or at smiller@indot.in.gov or Mary Kennedy, History Team Lead, at 317-232-5215 or at mkennedy@indot.in.gov.

Thank you.

- [INDOT-CRO+Updated+Consultation+Steps_2017-05-10.doc](#)
- [CP+and+Tribal+ECL+Template_without_106_docs_2017-04-26.doc](#)
- [CP+and+Tribal+ECL+Template_with_106_docs_2017--04-26.doc](#)
- [INDOT-CRO+Consultation+Email+Template.doc](#)

Thu 4/27/2017 1:56 PM

Good afternoon,

As the new fieldwork season rolls on, INDOT-CRO asks that following points be kept in mind during archaeological investigations and reporting. We have noticed a developing trend in which project areas and sites are having to be revisited because adequate information to clear a project area or evaluate a site was not gathered during the initial reconnaissance. To lessen these occurrences from happening we recommend following the guidance provided in points 4-10 below. **Please wear your personal protective equipment in the field and have a safe and enjoyable season.**

- Reports with more than 1 or 2 oversized pages (larger than 8.5 x 11) or more than 50 pages in length will need to be printed, bound, and provided to our office after the report has been approved by DHPA.
- Photographs included in archaeological reports must be in focus, without excessive glare from sunlight or flash, and with generally natural colors (i.e. no orange tint from fluorescent lighting).
- It is not necessary or desirable to use the maximum date range possible for historic artifacts. For example, square nails are still available today, but their use is limited to a few specific activities. Therefore, in the absence of some extenuating circumstance, a terminal 19th century end date end date is better than a modern end date.

- Fill can look like disturbance in many situations. In locations like urban areas or the base of slopes it may be necessary to excavate through apparently disturbed sediments to check for undisturbed soils below.
- It is still required that no-till fields are shovel tested regardless of surface visibility. Please state whether fields examined through pedestrian survey have been plowed recently and adequately rain washed.
- For linear project areas, like road widening projects, the best practice is to work from the outside of the project area proceeding inward toward the road. This will ensure that the area with the least potential to be disturbed is examined, and therefore that the good faith effort to locate cultural resources has been completed.
 - If the project area extends into a wooded area, then the survey transect should go into the wooded area.
 - If the project area extends to the top of a road cut, then it is necessary to examine the top of the road cut.
- At least one shovel test is required on sites discovered through pedestrian survey. One shovel test is the minimum requirement; additional shovel tests can and should be excavated based on variables such as:
 - Site size.
 - Landform: different topographic areas within a site should be tested.
 - Known or suspected intrasite areas:
 - House area vs. yard in historic sites.
 - Artifact concentrations and possible features vs. other areas of a site.
 - Areas of suspected disturbance vs. potentially undisturbed areas.
- When defining site boundaries, additional radial shovel probes must be excavated around positive radials near the site margins.
- Additional radial probes are recommended around any positive probe that (for example) contains an unusually high number of artifacts for the site, contains prehistoric pottery, or exhibits evidence of a possible buried horizon, even if that probe is not located at the site boundary.
- While shovel probing historical sites, additional shovel probes within the site interior may need to be excavated off of the 15 m grid in order to test foundations or cellar interiors, depressions and other surface features, and the locations of historically mapped structures that were identified during the records check.

In general, DHPA's Guidebook for Indiana Historic Sites and Structures Inventory – Archaeological Sites and INDOT's Cultural Resources manual lay out the minimum standard methodologies required to conduct archaeological investigations for INDOT. While these minimum standards are typically sufficient, it is not uncommon that additional work may be necessary. The purpose of the archaeological Phase I reconnaissance is to demonstrate that a good faith effort has been made to locate and evaluate archaeological resources that may be

impacted by an undertaking. INDOT, CRO requires that the level of effort to be equal to this goal.

Please direct any questions to Shaun Miller, INDOT Archaeological Team Lead at smiller@indot.in.gov or (317) 233-6795.

Thu 1/5/2017 11:49 AM

Good Morning,

Updated Section 106 Public Notice Templates

The Section 106 public notice templates have been updated and are customized according to the finding that is being made. Please choose the template for a “no historic properties affected,” “no adverse effect,” or “adverse effect” finding accordingly. The updated templates also include references to IN SCOPE and include the required “Americans with Disabilities Act” verbiage. Updated public notice templates for historic bridge projects are currently under development and will be distributed upon completion.

Updated Sample Format for a Section 106 Recommendation

The sample format for a Section 106 recommendation has been updated to reflect the current appropriate signatories for INDOT and FHWA. Additionally, a new Section 4(f) compliance statement option has been added to address when historic properties are present and land within a historic property is temporarily occupied. Per 23 CFR 774.13(d), a temporary occupancy of land (such as temporary right of way) that is so minimal may not constitute a use within the meaning of Section 4(f). For a temporary occupancy to be exempted, the following conditions must be 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 appropriate Section 4(f) compliance statement from the template should be used. The fulfillment of conditions 1-4 must be detailed in Section 4 of the accompanying documentation specified at 36 CFR 800.11(e), “Describe the Undertaking’s Effects on Historic Properties.” To

fulfill condition 5, the transmittal letter to the State Historic Preservation Officer should explain the temporary occupancy and ask for their written concurrence.

The new templates are effective immediately. They are attached and can be found on the Cultural Resources Manual website: <http://www.in.gov/indot/crm/2341.htm>.

Please contact CRO manager Anuradha Kumar at 317-234-5168 or akumar@indot.in.gov if any questions.

- [2017 Sample format for a Section 106 recommendation.docx](#)
- [Section 106 Public Notice Template NHPA FINALJan2017.doc](#)
- [Section 106 Public Notice Template AE FINALJan2017.doc](#)
- [Section 106 Public Notice Template NAE FINALJan2017.doc](#)

Wed 12/28/2016 3:45 PM

Good Afternoon!

The Indiana Historic Bridge Programmatic Agreement states, in part, in Stipulation II.C.2 that “At least every ten (10) years, FHWA, INDOT, and the Indiana SHPO will consult to determine if conditions have changed that would require updating the list of bridges eligible for the NRHP, the criteria for identifying Select and Non-Select Bridges, and the list of Select and Non-Select Bridges.” Please find a letter attached from the FHWA Indiana Division regarding this matter. The letter and an Excel spreadsheet version of Appendix A of the letter are available for download on INDOT’s *Historic Bridge Inventory Summary and Results* webpage: <http://www.in.gov/indot/2531.htm>.

(Direct links: <http://www.in.gov/indot/files/2016-12-28HBPARReviewLetterMMsigned.pdf> & http://www.in.gov/indot/files/Select_Non-SelectList_Updated_Dec2016.xls).

Please feel free to distribute this information to others who may be interested. If you have any questions, please contact Mary Kennedy, INDOT Architectural Historian (317-232-5215 or mkennedy@indot.in.gov) and/or Michelle Allen, FHWA Planning & Environmental Specialist (317-226-7344 or michelle.allen@dot.gov).

- [2016-12-28HBPARReviewLetterMMsigned.pdf](#)

Thu 12/8/2016

Several items from the Cultural Resources Office:

Project Review Updates

- Please ensure that Section 106 Early Coordination Letters and Historic Property Reports are sent to us simultaneously for review. Also, the public notices and the Section 106 finding and accompanying 800.11 documentation must be sent to us for review in one combined submission.
- Due to current workloads and short staffing, all INDOT-CRO reviews, except those pertaining to archaeological investigations, are taking 15 business days to complete. Any

queries regarding the status of reviews should be made only if you have not heard back from us after the passage of 15 business days.

- Any combined submission or expedited review requests – either by CRO or the SHPO staff - should come to INDOT-CRO from the INDOT Project Manager, if they deem the request appropriate.

SHAARD GIS Updates

- If you find an error in SHAARD or SHAARD GIS, contact DHPA's SHAARD manager, Jeannie Regan-Dinius: jrdinius@dnr.in.gov. She can fix the error before your project is turned into INDOT so that your map or the information in SHAARD is correct. Most fixes can be done immediately, but at times, if Jeannie is in the field, it may take 2-3 days, so let her know when you find the error, not the day your project is due to INDOT. DHPA wants SHAARD and SHAARD GIS to be accurate and they are working daily to fix errors.

Correspondence/Consulting Party Updates

- For any projects with an “adverse effect” finding, consultants should now fill out the Electronic Section 106 Documentation Submittal System (e106) Form (linked below) to aid FHWA in formally notifying the ACHP of a project’s “adverse effect” finding. After INDOT-CRO has reviewed an “adverse effect” finding and the supporting documentation and is ready to forward the information to FHWA for review and approval, INDOT-CRO will notify the consultant that preparation of the e106 form can be completed. The e106 form will need to be prepared and submitted to INDOT-CRO before the documentation is sent to FHWA. <http://www.achp.gov/docs/e106-instructions-form.pdf>.
- INDOT-CRO must be provided copies of all consulting party correspondence or responses to public notices received during the Section 106 consultation process as soon as they are received in order to assist in formulating an appropriate response where necessary. If INDOT-CRO is not aware of this information, the completion of the Section 106 process could be delayed.
- Please note that it is not necessary to include a copy of every letter sent to every consulting party. A “generic” or template copy of the Early Coordination Letter may be uploaded into IN SCOPE that is addressed “Dear Consulting Party.” To save time and reduce confusion, we recommend that one letter version be used for all consulting parties including the SHPO.
- Indiana Landmarks, an organization that FHWA requires to be invited as a Section 106 consulting party on all projects, has recently revised some of the mapping for their regional and field offices. Please be sure to check the map at the following link to find the correct office to invite: <https://www.indianalandmarks.org/news/in-your-area/>

Please direct any questions to Anuradha Kumar, CRO manager at 317-234-5168 or akumar@indot.in.gov.

Wed 9/21/2016 1:16 PM

Good afternoon!

Please see below for guidance on environmental review for INDOT's Community Crossings program.

Community Crossings projects funded with only state and local money are not federal actions and therefore NEPA does not apply. The recipient unit of government is the project proponent and is responsible for documenting how the project meets the requirements of the State Environmental Policy Act (SEPA). Many projects will be exempted under the rule.

- Check 327 IAC 11-1-3 <http://www.in.gov/legislative/iac/T03270/A00110.PDF> for exclusions and the INDOT CE Manual (2013) pg. 10 http://www.in.gov/indot/files/ES_2013CEManual.pdf for exemptions. If the project meets either of these requirements, document this in a memorandum to the project file. This documentation may be required later in project development.
- Projects that are not exempted or excluded will require a SEPA document. Please contact Ron Bales, Environmental Policy Manager, INDOT Environmental Services Division at rbales@indot.in.gov to discuss further.
- Compliance with NEPA or SEPA does not excuse a project's compliance with state historic preservation laws. Included here is a link from INDOT's Cultural Resources Manual that highlights those state regulations that are most likely to apply to transportation projects- http://www.in.gov/indot/crm/files/Chapter_1-Overview.pdf. Projects that are limited to existing roadway footprint, such as resurfacing or patching, would likely not impact any historic properties and therefore not require coordination. If a Community Crossings project goes beyond the existing footprint or there are questions about impacts to historic properties, the project sponsor or consultant can send INDOT's Cultural Resource Office (INDOT-CRO) a project description and aerial map, and INDOT-CRO will provide guidance on any actions that should occur concerning state preservation law compliance. Contact Anu Kumar, Cultural Resources Manager, at 317-234-5168 if you have questions.

A project's federal permits are actually a **separate federal action by the permitting agency, and that agency (e.g. USACE) is the lead agency for that federal action**. Follow the federal agency's requirements for investigations and documentation to meet their requirements. This will likely include demonstrating compliance with Section 106 and Endangered Species Act, and possibly other federal laws. It is the project proponent's responsibility to identify the need for federal permits early in project development, demonstrate compliance with these federal laws, and execute any required mitigation. Contact Sandy Bowman, Ecology and Waterway Permitting Manager, at 317-233-5568 if you have questions.

Mon 6/20/2016 11:19 AM

Good Morning,

INDOT's Cultural Resources Office has begun implementation of IN SCOPE, INDOT's Section 106 electronic coordination website. IN SCOPE will be used to post all Section 106 documents for INDOT and LPA projects. IN SCOPE is intended to reduce the environmental footprint associated with Section 106 documentation, minimize administrative costs, while also improving and facilitating consulting party and public access to Section 106 documents. IN SCOPE is located here: <http://erms.indot.in.gov/Section106Documents/>.

Please find attached the IN SCOPE Guidance Document dated June 2016. The IN SCOPE Guidance Document provides instructions for consultant registration to use IN SCOPE and post documents. For consultants participating in Section 106 coordination and completing Section 106 documentation, please familiarize yourself with the IN SCOPE Guidance Document. If you have any questions concerning IN SCOPE, please direct those to Patrick Carpenter at 317-233-2061 or pacarpenter@indot.in.gov.

Fri 10/9/2015

Updates from the Cultural Resources Office:

Effective immediately, prior to distributing Section 106 Early Coordination or any Section 106 correspondence, please provide to the Cultural Resources Office for formal review and approval. For correspondence that accompanies reports or other documentation, please submit simultaneously so we can combine reviews in the same time period. The purpose of this review is to ensure that the appropriate consulting parties are being reached and other facets of the correspondence adequately convey the appropriate project and procedural information as appropriate. This review step will help facilitate the process and avoid potential problems later in project development.

Please note that INDOT is currently developing an electronic web portal for posting Section 106 documents for all INDOT and LPA projects. The web portal will be a tool for disseminating Section 106 documents and reducing administrative time and costs associated with mailing paper copies. As we transition to this system, approval of correspondence will be a necessary component to posting to the web portal.

Please email Early Coordination correspondence to: culturalresources@indot.in.gov. A reviewer will be assigned to the project and respond after their review. Once you have an assigned reviewer on the project, you may proceed to email them follow-up correspondence, reports and other documentation directly.

We will update the Cultural Resources Manual to reflect this change and will be providing ongoing updates as we roll out our Section 106 web portal.

For any questions please contact Patrick Carpenter, Manager of the Cultural Resources Office at 317-233-2061 or pacarpenter@indot.in.gov

Wed 10/10/2012

Hi All--two items from our cultural resources group:

1. NCHRP Report 723: A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing

The Transportation Research Board's National Cooperative Highway Research Program (NCHRP) has published (NCHRP) Report 723: A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing provides an approach to the identification and evaluation of postwar housing resources that can be used within the framework of Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. The report includes a methodology for identification and evaluation of the National Register eligibility and non-eligibility of single-family housing built between 1946 and 1975. The report also includes a national context to understand the development of postwar housing and to help guide the evaluation of postwar residential types.

The report is now available in the TRB bookstore: <http://www.trb.org/Finance/Bookstore.aspx>. The cost is \$68 for hard copies (unless you are with a state DOT) or it can be downloaded for free. If you want to order copies it is recommended to *call* the TRB Bookstore at 202-334-3213 and place your order that way. You can also get to the report from the NCHRP 08-77 project webpage: <http://apps.trb.org/cmsfeed/TRBNetProjectDisplay.asp?ProjectID=2706> The webpage also includes a PowerPoint presentation.

The research team is planning to present the report at a TRB webinar tentatively scheduled for the afternoon of January 7, 2013. Please check back with the TRB website for specific information and updates. We will try and update as well.

For QP historians/architectural historians, please familiarize yourself with the report as you survey and evaluate post-WWII houses. Please let us know if you have any questions or recommendations concerning utilizing the report for INDOT/FHWA surveys.

2. Historic Property Report Guidance

When preparing HPRs, please limit overly detailed project descriptions and finding effect finding recommendations. In consultation with SHPO, they have pointed out that later changes in the project or effect findings may cause procedural confusion if a HPR contains different or contradictory information than that of the eventual finding/800.11 documentation. Please focus the HPR on the identification and evaluation of properties, and not project and effects related discussions. A enough project information should be conveyed to support the APE delineation, but otherwise please keep the HPR targeted to identification and evaluation. Details concerning project scope, an update of where you are in the 106 process, your expectations for SHPO's review (your requesting SHPO's concurrence, etc.), can all be contained within the transmittal letter. Transmittal letters should convey the necessary information to aide in SHPO's review and keep the process moving on schedule.

Please do not hesitate to contact Patrick Carpenter at 317-233-2061 or pacarpenter@indot.in.gov if you have any questions.

Tue Mar 6 11:55:42 EST 2012

Good morning.

We have these announcements from INDOT Environmental Services:
Cultural Resources Office:

Landowner notification

A reminder to archaeologists and historians: as stated in the INDOT Notice of Entry Letter, an attempt must be made to notify the landowner before entering private property; also, safety vests are required when performing work for INDOT.

Consultant contact with SHPO

INDOT Cultural Resources Office again reminds consultants to not contact DHPA/SHPO on behalf of FHWA/INDOT without prior coordination with INDOT CRO.

Consultation with Tribes

Authority to initiate or carry out any Sec. 106 consultation with tribes has not been delegated to FHWA/INDOT consultants. If you are contacted by a tribe, please do not consult but instead contact our office for guidance. If you are already working with tribes on behalf of FHWA outside of this restriction please contact CRO for further guidance.

New ACHP guidance on efforts to identify historic properties

The ACHP released new guidance to Section 106 users on meeting the regulatory requirement that federal agencies make a "reasonable and good faith effort" to identify historic properties as part of the Section 106 process. The guidance sets forth criteria the ACHP will use when it is asked to provide its advisory opinion on whether a specific identification effort was both reasonable in terms of intensity and scale, and carried out in good faith through its development and execution. The document can be found on the ACHP's website at http://www.achp.gov/docs/reasonable_good_faith_identification.pdf.

Mon Sep 19 09:12:49 EDT 2011

Good morning!

We have several items for you today from the Environmental Policy Office of INDOT Environmental Services.

Additional Early Coordination Request: We would appreciate it if you could include a "cc" list on all early coordination letters. This helps verify that all appropriate stakeholders are being contacted, and can cut down on redundant or conflicting responses from different agencies.

Section 4(f) for Reacquired Right of Way: We have had further discussions with the Federal Highway Administration regarding applicability of Section 4(f) to reacquisition of apparent right of way. As a result, we need to revise our policy on how to handle those situations. When it is necessary to reacquire land from a property which is eligible for the National Register of Historic Places, Section 4(f) will apply, although in most cases a de minimis finding will be appropriate. When it is necessary to reacquire land from a publicly-owned recreational property, you should take a look at the usage of the affected acreage. In most cases the area to be reacquired will not be in recreational use, and Section 4(f) will not apply. Please feel free to contact us for project-specific interpretations.

Fri May 20 12:25:12 EDT 2011

Greetings!

One announcement today, in response to questions from multiple sources, about the heavily restricted use of Google Earth and Google Maps in INDOT documents. We're concurrently providing this interim guidance to our legal group for review, and we'll revise it if necessary.

Appropriate Use of Google Earth and Google Maps for INDOT Projects

In general, Google Maps (and other related online spatial content such as Bing Maps, Yahoo Maps, etc.) are appropriate for simple searches, driving directions and uses that are not printed/published material. Examples of printed or published material include using a copy of a map in an electronic or printed document (ex. Waters Report, CE Document, Historic Property Report, etc.), a poster, electronic or printed communication and other similar uses. Per Google's "Permission Guidelines for Google Maps and Google Earth," (www.google.com/permissions/geoguidelines.html<<http://www.google.com/permissions/geoguidelines.html>>) Google does not permit most static, extracted or copied versions of their maps without licensing for those specific uses. In addition, unless a licensed copy of Google Earth has been purchased for business use, its use is prohibited on State computers.

The only situation in which a map from Google could be used in a print publication is if the material was derived from a purchased/licensed copy of Google Earth, in which case, it would need to be noted in the attribution that the data was derived from a licensed copy of Google Earth. This would apply only to consultant derived material, as there are no known instances of the State participating in any single use or enterprise licensing from Google at this time.

There is a "Special Use Cases" caveat in Google's guidelines for "contractors' or environmental consultants' reports," however, the stipulation that they impose on this specific use eliminates it from INDOT projects falling under this "Special Use Case." The last sentence states:

"You may not extract Content for derivative uses that do not relate to the products, such as for further editing within another drafting, desktop publishing, or GIS application."

Since maps are typically used as part of a larger document, and often with added notation to the maps to indicate site specific information, INDOT's use would no longer qualify under this "Special Use Cases."

As alternatives, ESRI, the State's GIS software standard, has several software and web options for use, including ArcExplorer (www.esri.com/software/arcgis/explorer<<http://www.esri.com/software/arcgis/explorer>>), with a variety of data sources, including the State GIO Library of GIS Data. The IndianaMap (indianamap.org<<http://indianamap.org>>) also has online mapping software to use with their extensive database of spatial information, most of which is also available for download. In addition, the GIO SharePoint Site is a one stop shop for templates, Agency server connections, layer (.lyr) files and other GIS news and events (myshare.in.gov/gis<<http://myshare.in.gov/gis>>). Please note that proper attribution as to the source of data used should be included in every map document.

This information is being provided as general guidance and is based on interpretation of the end user agreements for the respective websites. Please consult the end user agreements and permissions for any websites that are used for further information and specific legal limitations of data usage.

Wed Mar 2 15:18:14 EST 2011

Good afternoon.

We have two items for you today.

Environmental Services

Consultant Submittal Evaluations: Design Memoranda 11-03 and 11-04 Technical Advisories, both regarding the Consultant Performance Evaluation Manual, have been posted on the Department website at:

<http://www.in.gov/dot/div/contracts/standards/memos/memos.html>

Please note that the Consultant Performance Evaluation scores may be used for scoring responses to RFPs, and may affect prequalification status. If you have any questions about the process, they may be directed to Laura Hilden, Ben Lawrence, Staffan Peterson or Nathan Saxe. If you have questions about the review of a particular submittal, please contact the reviewer directly.

Environmental Policy

MPO Early Coordination: This is a reminder that you should include the Metropolitan Planning Organization (MPO) in your early coordination for all projects within their boundaries. We understand there have been a few projects recently where the MPO was missed.

Thu Jan 13 08:09:25 EST 2011

Cultural Resources Section

This is a reminder that consultants working on FHWA/INDOT projects must follow all DHPA guidelines for Phase 1a survey. In particular, any decisions about survey and testing must recognize and document the type of disturbance, surface visibility, and survey conditions:

- 1) The new DHPA guidelines for shovel probing state that probes should extend into "undisturbed soils," or else to a maximum depth of 50 cm. Archaeologists working on FHWA/INDOT shall interpret "undisturbed soils" to mean sterile subsoil.
- 2) "Residential use" is not a type of ground disturbance, and is not by itself an adequate reason to avoid shovel probing an area.
- 3) DHPA guidelines for Phase 1a surface survey require both adequate surface visibility and adequate survey conditions for detecting archaeological sites. Survey conditions are inadequate when "cultural materials would not be expected to be readily exposed on the surface" (typically the case in unplowed, freshly plowed, or no-till fields). If surface

visibility and survey conditions are not both adequate, then "shovel probing must be employed."

If in doubt, please contact Mr. Shaun Miller for guidance at [smiller at indot.in.gov](mailto:smiller@indot.in.gov) <mailto:[smiller at indot.in.gov](mailto:smiller@indot.in.gov)> .

Thu Mar 4 14:42:35 EST 2010

Hello - INDOT OES has the following updates. The first concerns changes in the documentation for 4(f). The second contains a clarification of earlier guidance on the use of the Historic Property Short Report. The final is an a release of the draft Project Development Process (PDP) for historic bridges, and an invitation to review and comment by March 23, 2010. Please direct any comments or questions to the contact listed within each update.

4(f) Documentation Change:

At the request of the Federal Highway Administration, all environmental documents with any 4(f) involvement should now be managed as a CE-4. This is a change from the previous policy, under which projects with de minimis or programmatic evaluations could proceed as a CE-3 document. As a result, it is no longer necessary to produce stand-alone 4(f) documents for those projects. The necessary information may be included in the text of the CE, and turned in for review at the time of environmental document submittal. However we do encourage you to seek a preliminary review and concurrence on the type of 4(f) evaluation to pursue. This can save surprises late in project development when the project timeline may be tighter.

This change only applies to documents which have not yet received 4(f) approval. If you have a project which has already been reviewed and approved, it is not necessary to rewrite or resubmit that portion of the document again.

Historic Property Report Guidance

The Cultural Resources Section would like to make a clarification to the updated historic property report guidance announced on this listserve on February 11, 2010. We have reworded the guidance to be sure it is understood that we are not intending to ignore historic properties that are less than 50 years of age (i.e., eligible under National Register Criteria Consideration G).

The guidance has been updated and the additions are provided in all caps below.

In addition to the scenarios currently described in the Cultural Resources Manual, an abbreviated historic property report may be prepared under the following circumstances:

*The only above-ground resource fifty years old or older within the APE is a bridge that has been evaluated in the latest historic bridge inventory.

*The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a

bridge that has been evaluated in the latest historic bridge inventory. (If resources other than the bridge warrant at least a Contributing rating, or if a property is less than 50 years old but meets National Register Criteria Consideration G (properties that have achieved significance within the last fifty years), a full report must be prepared in order to properly evaluate those resources).

*The only above-ground resource fifty years old or older within the APE is a property that is listed in the National Register of Historic Places.

*The only above-ground resource fifty years old or older present within the APE, that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a property that is listed in the National Register of Historic Places (If resources other than the National Register listed property warrant at least a Contributing rating, or if a property is less than 50 years old but meets National Register Criteria Consideration G (properties that have achieved significance within the last fifty years), a full report must be prepared in order to properly evaluate those resources).

Please note that some properties less than fifty years old may be eligible or listed on the National Register of Historic Places under National Register Criteria Consideration G (properties that have achieved significance within the last fifty years).

In the text of the report, the following considerations should be given:

*For bridges evaluated in the latest historic bridge inventory, provide appropriate references to the inventory and the recommendations made in the inventory.

*For properties listed in the National Register of Historic Places, provide appropriate references to when the property was listed and under what criterion. Provide a brief analysis of whether maintenance of the National Register listing is appropriate.

This new guidance will be included in an updated Cultural Resources Manual, to be released later this year.

If you have any questions about this particular item, please contact Mary Kennedy at mkennedy@indot.in.gov <mailto:mkennedy@indot.in.gov> .

Thu Feb 11 15:46:24 EST 2010

We have one update for you today from the Office of Environmental Services:

Cultural Resources

The Cultural Resources Section is pleased to announce updated historic property report guidance to aid in streamlining the Section 106 process. This guidance, which outlines new circumstances under which a short format historic property report can be produced, is due in part to consultant feedback and in anticipation of the finalization of the Indiana Historic Bridge Inventory project and full implementation of the Historic Bridge Programmatic Agreement. In addition to the

scenarios currently described in the Cultural Resources Manual, an abbreviated historic property report may be prepared under the following circumstances:

- * The only above-ground resource fifty years old or older within the APE is a bridge that has been evaluated in the latest historic bridge inventory.
- * The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a bridge that has been evaluated in the latest historic bridge inventory. (If resources other than the bridge warrant at least a Contributing rating, a full report must be prepared in order to properly evaluate those resources).
- * The only above-ground resource fifty years old or older within the APE is a property that is listed in the National Register of Historic Places.
- * The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a property that is listed in the National Register of Historic Places (If resources other than the National Register listed property warrant at least a Contributing rating, a full report must be prepared in order to properly evaluate those resources).

In the text of the report, the following considerations should be given:

- * For bridges evaluated in the latest historic bridge inventory, provide appropriate references to the inventory and the recommendations made in the inventory.
- * For properties listed in the National Register of Historic Places, provide appropriate references to when the property was listed and under what criterion. Provide a brief analysis of whether maintenance of the National Register listing is appropriate.

This new guidance will be included in an updated Cultural Resources Manual, to be released later this year.

If you have any questions about this particular item, please contact Mary Kennedy at mkennedy@indot.in.gov

Fri Jan 22 07:39:32 EST 2010

Good morning! We hope everyone's new year is off to a good start. We have three updates for you today from the Office of Environmental Services:

Cultural Resources

Archaeological Short Report: In an effort to reduce time and paper, the DHPA archaeological staff, with the assistance of the INDOT CRS archaeological staff, has developed an Archaeological Short Report format. This format may be used for archaeological records checks

and Phase Ia Reconnaissance regardless of acreage provided that no previously recorded sites are present and that no new sites are found. Further guidance and the form itself are at:
<http://www.in.gov/indot/2521.htm>.

Thu Dec 10 12:42:58 EST 2009

-INDOT OES - Cultural Resources Section requests that practitioners no longer contact DHPA in regard to review timelines or schedules for INDOT projects but instead to direct such inquiries to CRS. Please contact Mr. Shaun Miller <mailto:smiller@indot.in.gov> for questions regarding archaeological documents and Mr. Patrick Carpenter <mailto:pcarpenter@indot.in.gov> regarding historical documents.

Wed Aug 12 14:31:22 EDT 2009

Cultural Resources:

It has been brought to our attention that occasionally consulting parties are not always copied when consultants communicate with SHPO. Please remember to keep Consulting Parties abreast of any changes in the project. The goal is to keep Consulting Parties involved as decisions are being made, not after they are made. This includes responses to SHPO comments or other substantive discussions with SHPO. Please see p. 28 of the INDOT Cultural Resources Manual for additional guidance on this topic. The manual can be found on the [INDOT Cultural Resources website](#).

Wed Jan 28 11:45:03 EST 2009

Cultural Resources

Section 106 Tips and Reminders:

- Feel free to run any correspondence and documents related to the process by the INDOT Cultural Resources Section for review before sending them out. INDOT-CRS review of certain items first, such as historic property and archaeology reports, is required, but we are always available to provide comments on other documents as the process unfolds. We try to provide input on how to make the review as smooth as possible.
- Always clearly inform INDOT-CRS and the SHPO which consulting parties are receiving the information for review either through a cc list on the letter or an attachment of names of all parties that received the information.
- All correspondence should clearly indicate the current step of the Section 106 process. If you would like INDOT-CRS, the SHPO, and/or consulting party comments on an APE, eligibility determinations, or effect (or even all three in one submission on simple projects), the letter should ask for comments on those specific items.
- Public notices to fulfill Section 106 public involvement requirements should state the appropriate agency undertaking the project, either INDOT or the LPA. Notices for LPA projects

should not state that INDOT is undertaking the project. We realize the public notice template in the Cultural Resources Manual might not be clear on this point, and it will be revised in 2009.

- The contact person for public notices should be the consultant conducting the Section 106 process. INDOT-CRS or the District environmental sections should not be listed unless you have arranged with these offices first for them to be the contact person. The contact person should be someone familiar with the project that is able to answer questions related to the Section 106 process.