



## **APPENDIX M**

### **Section 106 Documentation**

#### **Tier 2 Environmental Impact Statement**

#### **I-69 Section 6**

#### **Martinsville to Indianapolis**

**FEDERAL HIGHWAY ADMINISTRATION'S  
SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties) AND  
SECTION 106 FINDINGS AND DETERMINATIONS  
AREA OF POTENTIAL EFFECTS  
ELIGIBILITY DETERMINATIONS  
EFFECT FINDING  
I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDY:  
SECTION 6, SR 39 TO I-465  
DES NO.: 0300382**

**AREA OF POTENTIAL EFFECTS**

(Pursuant to 36 CFR Section 800.4(a)(1)), the Area of Potential Effects (APE) for aboveground resources is centered on a 2,000-foot wide corridor that was selected at the end of Tier 1 to advance to the Tier 2 Study. The Section 6 corridor begins on SR 37 just south of SR 39 near Martinsville and extends north to I-465 at Indianapolis, a distance of some twenty-six miles. The width of the APE varies from a maximum of two miles (one mile on either side of SR 37) to a minimum of just over 4,000 feet (roughly 2,000 feet on either side of SR 37). Just south of the city of Martinsville, the APE extends for one mile on either side of SR 37 except in locations where the topography limits the view to and from SR 37. Along I-465, the APE extends to 1,000 feet on either side of the already existing highway (See Appendix M-1: Maps).

The APE for the Phase Ia literature review for archaeology is the 2,000-foot corridor. The APE for the Phase Ia reconnaissance is the footprint of the preferred alternative.

**ELIGIBILITY DETERMINATIONS**

(Pursuant to 36 CFR 800.4(c)(2)), sixteen properties listed in, or eligible for listing in, the National Register of Historic Places (NRHP) have been identified within the APE.

**Morgan County Bridge 224 (Indiana Historic Sites and Structures Inventory [IHSSI] No. 109-386-60030; National Bridge Inventory [NBI] No. 5500142)** is a three-span Warren pony truss with concrete deck, abutments, wingwalls, and piers that was completed in 1925. Morgan County Bridge No. 224 was determined eligible as a Select Bridge in the *Indiana Statewide Historic Bridge Inventory* under Criterion C. The period of significance is 1925, the year of construction identified in the Inventory.

**Top Notch Farm (IHSSI No. 108-386-60028)** is located around the base of Pollard Hill near SR 37 at Mahalasville Road in Martinsville. The property includes a simple one- and one-half story, frame farmhouse and several outbuildings relating to dairy farming. The house and garage were built in 1932. Most of the outbuildings date to the 1930s. Top Notch Farm is eligible for inclusion in the NRHP under Criterion A. The period of significance is 1932 to circa 1950.

**East Washington Street Historic District (National Register [NR] 1313)** is located in the city of Martinsville. Prevalent architectural styles include Queen Anne and Colonial Revival. Also represented are the Second Empire, Craftsman, Free Classic, Bungalow, Italianate, Stick, Shingle, and Prairie styles. Vernacular types include gable-front, gabled-ell, and double-pen houses. Mature shade trees extend on both sides of Washington Street. Other contributing elements are sandstone curbs, iron fences, and brick and stone retaining walls. The East Washington Street Historic District was listed in the NRHP in 1997 and is significant under Criteria A and C. The period of significance is 1869 to circa 1940.

**W.E. Nutter House (IHSSI No.109-386-64053)** appears to be unaltered, is in excellent condition, and is distinctive for its degree of architectural detail. The two-story, three-bay house is basically an American Foursquare in massing, with a sun porch and a porte cochere. Noteworthy architectural details include leaded glass windows and doors, stone accents, modillions under the eaves, and a pantile roof. The W. E. Nutter House retains integrity and is eligible for listing in the NRHP under Criterion C. The period of significance is circa 1915.

**Pearcy Farm and Clear Creek Fisheries (IHSSI No. 109-386-60015)** consists of a Central Passage House (circa 1870) and five agricultural buildings dating to the historic period including a smokehouse, tool shed/corn crib, small barn, and two utility sheds (all circa 1920); the large fishery (1934) includes a barn and complex of ponds east of the main outbuildings with intact transportation networks. The fishery includes eighty-eight actively farmed ponds containing eight varieties of commercial game fish. This property is eligible for listing in the NRHP under Criteria A and C (house only) for significance in the areas of Agriculture and Architecture. The period of significance is circa 1870 to 1972.

**Grassyfork Fisheries Farm No. 1 (NR-2209)** consists of a main building, several accessory buildings and structures, and dozens of goldfish breeding and hatching ponds. The Office and Display Room Building, built in 1936, is located near Old 37 (also known as Morgan Road) within the APE for this project and is a two-story commercial structure with Prairie-style massing and details. Grassyfork Fisheries Farm No. 1 was listed in the NRHP in 2012. It is significant under Criteria A, B, and C with a period of significance from 1936 to 1960.

**Reuben Aldrich Farm (IHSSI No. 109-428-30009)** (also known as Big Bend Farm) consists of three buildings: an Italianate-style house, a barn, and a garage. The house dates from 1869; the barn is antebellum, with post-Civil War improvements and additions; and the garage appears to date from circa 1915. The Reuben Aldrich Farm is eligible for listing in the NRHP under Criteria A and C, for Agriculture and Architecture. The period of significance is circa 1869 to 1915.

**Morgan County Bridge No. 166 (IHSSI No. 109-428-30017; NBI No. 5500153)** is a two-span, reinforced concrete slab. The deck is thirty-seven feet long and thirty-six feet wide, with two lanes. The bridge was determined eligible for listing in the NRHP as a Select bridge per the *Indiana Statewide Historic Bridge Inventory*. Bridge No. 166 is eligible under Criteria C, and the period of significance is 1925, the date of construction.

**Travis Hill Historic District** (developed in 1962) consists of five houses on five lots radiating from the Travis Place cul-de-sac atop Travis Hill. Each lot is about an acre in size. The houses are located close to the street, Travis Place, providing large backyards that follow the slope of Travis Hill with sweeping vistas. Travis Hill Historic District is eligible for listing in the NRHP under Criteria A and C. The period of significance begins in 1962, the date that the first house was constructed, and ends in 1968, the date that the last house was constructed.

**John Sutton House (IHSSI No. 081-031-10002)**, constructed in 1875, is a two-story, brick, Italianate-style dwelling once part of a large Johnson County farm. It exhibits most of the hallmarks of the Italianate style, such as a low-pitched, hipped roof, bracketed cornice, and round arched windows. Noteworthy details include the spiral molding around window frames, keystones in arched openings, and detailed scrollwork on brackets. The property is eligible under Criterion C for Architecture, and the period of significance is 1875, the year of construction.

**Marion County Bridge No. 4513 F (NBI No. 4900484)** is a reinforced concrete bridge constructed in 1954. The bridge, which has an open concrete balustrade, was determined NRHP eligible as a Non-Select Bridge in the *Indiana Statewide Historic Bridge Inventory*. The bridge is eligible under Criterion C, for

Engineering, because it features variable depth construction, which “is an important innovation in bridge construction to achieve greater span distances than can be achieved with a traditional form.” The period of significance is 1954, the date of construction.

**Cleary-Barnett House** is a classic Ranch house sited at the apex of a small hill and built into the slope to take advantage of the uneven terrain. Built in the 1950s, the Cleary-Barnett House is a one-story house faced with random-coursed limestone ashlar resting on a full basement. A broad low chimney, also faced with limestone, punctuates the roof. The Cleary-Barnett House retains high integrity and is eligible for listing in the NRHP under Criterion C for Architecture. The period of significance is circa 1955, the date of construction.

**Glenn’s Valley Nature Park Retreat House (IHSSI No. 097-392-85416)** is located in the center of Glenn’s Valley Nature Park north and east of the village of Glenn’s Valley. It is a two-story Colonial Revival-style house dating to 1935. The house and twenty-seven acres of meadows and woods became part of the Indianapolis park system in 1992. The Retreat House has a side gable roof and is clad in bricks painted white. The house features such typical Colonial Revival details as a symmetrical façade, a two-story, Mount Vernon-style porch, an exterior end chimney, and sidelights bordering a central entrance. Glenn’s Valley Nature Park Retreat House is eligible for the NRHP under Criterion C for Architecture. The period of significance is 1935, the date of construction.

**Glennwood Homes Association Historic District** is an excellent example of a post-war residential neighborhood as expressed in the outstanding examples of Modern and Ranch houses in Marion County, Indiana. Glennwood Homes Association neighborhood consists of twenty-six irregularly shaped lots conforming to the rugged terrain of the 46.5 acres accessed by two curvilinear private roads that terminate into three cul-de-sacs. The neighborhood consists of 23 houses, 20 of which were constructed in the 1950s and 1960s and were designed and built in the popular Ranch style and the less common Modern style. The Glennwood Homes Association Historic District is eligible under Criteria A and C. The period of significance is 1949, the date that the community was platted, and ends in the 1960s when it reached its present size.

**Le Ciel (Charles Laughner House)**, a circa 1967 New Traditional French house, occupies the crown of the hill and is approached by a long, steep, serpentine, wooded driveway from Belmont Avenue. The house has three levels distinguished by three different materials, color, and textures: the brick first floor, the half-timbered second floor, and the massive steeply pitched hipped roof that is clad with asphalt shingles resembling slate. Le Ciel is eligible for the NRHP under Criterion C. The date of significance is circa 1967, the date of construction.

**Southside German Market Gardeners Historic District** is comprised of the small field/garden patterns, greenhouses, barns, sheds, and houses along Bluff Road that when combined, or taken as a whole, creates a definite “feeling” and “association” of a way of life. Market gardeners, as they were called in the twentieth century, lived and worked in a distinct community on the south side of Indianapolis; a portion of this community is located along Bluff Road within a section of the expanded APE (2015). A market garden property might include a house or houses, barns, greenhouses, and fields/gardens. The Southside German Market Gardeners District is eligible for the NRHP Criteria A and C. The period of significance is circa 1900 to 1972.

Eligibility for any archaeological resources identified within the APE will be determined at a later date.

## **EFFECT FINDING**

Morgan County Bridge 224 – No Adverse Effect

Top Notch Farm – No Adverse Effect

East Washington Street Historic District – No Effect

W.E. Nutter House – No Effect

Pearcy Farm and Clear Creek Fisheries – No Effect

Grassyfork Fisheries Farm No. 1 – No Adverse Effect

Reuben Aldrich Farm – Adverse Effect

Morgan County Bridge No. 166 – No Effect

Travis Hill Historic District – No Adverse Effect

John Sutton House – No Adverse Effect

Marion County Bridge No. 4513 F – No Adverse Effect

Cleary-Barnett House – No Adverse Effect

Glenn’s Valley Nature Park Retreat House – No Adverse Effect

Glennwood Homes Association Historic District – No Adverse Effect

Le Ciel (Charles Laughner House) – No Adverse Effect

Southside German Market Gardeners Historic District – Adverse Effect

FHWA has determined an Adverse Effect finding is appropriate for this undertaking. FHWA respectfully requests the Indiana State Historic Preservation Officer provide written concurrence with the Section 106 determination of effect for each property and the project’s overall effect finding.

## **SECTION 4(F) COMPLIANCE REQUIREMENTS (for historic properties)<sup>1</sup>**

**Morgan County Bridge No. 224** - This resource is used for transportation purposes. This undertaking will have “No Adverse Effect” on Morgan County Bridge No. 224, a Section 4(f) historic property. FHWA has determined the appropriate Section 106 finding is "No Adverse Effect"; no Section 4(f) evaluation is required for Morgan County Bridge No. 224.

**Top Notch Farm** - This undertaking will not convert property from Top Notch Farm, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for Top Notch Farm.

**East Washington Street Historic District** - This undertaking will not convert property from East Washington Street Historic District, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Effect”; no Section 4(f) evaluation is required for East Washington Street Historic District.

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<sup>1</sup> A full discussion of Section 4(f) compliance may be found in the Environmental Impact Study (EIS), Chapter 8; a full discussion of the effects of the undertaking on listed and eligible resources may be found in sections 4 and 5 of this document.

**W.E. Nutter House** - This undertaking will not convert property from W.E. Nutter House, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Effect”; no Section 4(f) evaluation is required for W.E. Nutter House.

**Pearcy Farm and Clear Creek Fisheries** - This undertaking will not convert property from Pearcy Farm and Clear Creek Fisheries, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Effect”; no Section 4(f) evaluation is required for Pearcy Farm and Clear Creek Fisheries.

**Grassyfork Fisheries Farm No. 1** - This undertaking will not convert property from Grassyfork Fisheries Farm No. 1, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for Grassyfork Fisheries Farm No. 1.

**Reuben Aldrich Farm** - This undertaking will not convert property from Reuben Aldrich Farm, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “Adverse Effect.” Because there will be no direct use of the property, there will be no temporary occupancy of the property that is adverse to the resource, and there was no determination of constructive use<sup>2</sup>, no Section 4(f) evaluation is required for Reuben Aldrich Farm.

**Morgan County Bridge No. 166** - This resource is used for transportation purposes. This undertaking will have a “No Effect” on Morgan County Bridge No. 166, a Section 4(f) historic property. FHWA has determined the appropriate Section 106 finding is "No Effect"; no Section 4(f) evaluation is required for Morgan County Bridge No. 166. [I](#)

**Travis Hill Historic District** - This undertaking will not convert property from Travis Hill Historic District, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for Travis Hill Historic District.

**John Sutton House** – This undertaking will not convert property from the John Sutton House, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for John Sutton House.

**Marion County Bridge No. 4513 F** – This resource is used for transportation purposes. This undertaking will have “No Adverse Effect” on Marion County Bridge No. 4315F, a Section 4(f) historic property. FHWA has determined the appropriate Section 106 finding is "No Adverse Effect"; no Section 4(f) evaluation is required for Marion County Bridge No. 4315F.

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<sup>2</sup> The setting of the Reuben Aldrich Farm would be impacted by an increase in traffic in front of the Reuben Aldrich Farm resulting in an adverse effect on this property. However, as the Reuben Aldrich Farm is located on Old SR 37 which historically was the main route past this farm, the change in setting is not large enough that the resource will experience an impact which would be so severe that it would substantially impair the protected activities, features, or attributes that qualify the resource for Section 4(f) protection, therefore there is no Section 4(f) constructive use. See Chapter 8 of the EIS for additional details.

**Cleary-Barnett House** – This undertaking will not convert property from Cleary-Barnett House, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for Cleary-Barnett House.

**Glenn’s Valley Nature Park Retreat House** – This undertaking will not convert property from Glenn’s Valley Nature Park Retreat House, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; therefore, no Section 4(f) evaluation is required for Glenn’s Valley Nature Park Retreat House.

**Glennwood Homes Association Historic District** – This undertaking will not convert property from Glennwood Homes Association Historic District, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for Glennwood Homes Association Historic District.

**Le Ciel (Charles Laughner House)** – This undertaking will not convert property from Le Ciel (Charles Laughner House, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is “No Adverse Effect”; no Section 4(f) evaluation is required for Le Ciel (Charles Laughner House).

**Southside German Market Gardeners Historic District** – This undertaking will convert property from Southside German Market Gardeners Historic District, a Section 4(f) historic property, to a transportation use. FHWA has determined the appropriate Section 106 finding is "Adverse Effect." Because land will be acquired for transportation right of way, a Section 4(f) evaluation is required for Southside German Market Gardeners Historic District.

FHWA respectfully requests the Indiana State Historic Preservation Officer to provide written concurrence on the adverse effect finding to aboveground resources. Eligibility of individual archaeological sites will be addressed at a later date. FHWA intends to address any archaeological work that may need to be completed after the Record of Decision through stipulations in a Memorandum of Agreement.



 Michelle Allen  
Mayela Sosa  
Division Administrator  
FHWA-IN Division

Feb. 14, 2017

Approved Date

**1.0 DESCRIPTION OF THE UNDERTAKING**

- 1.1 Project Description
- 1.2 Area of Potential Effects

**2.0 EFFORTS TO IDENTIFY HISTORIC PROPERTIES**

- 2.1 Data Collection
  - 2004-2008 Study*
  - 2015-2016*
  - Archaeology*
- 2.2 Timeline of Consultation
- 2.3 Consulting Parties
  - Identification of Consulting Parties*
- 2.4 Consulting Party Meetings
  - First Consulting Party Meeting*
  - Second Consulting Party Meeting*
  - Third Consulting Party Meeting*
  - Fourth Consulting Party Meeting*

**3.0 DESCRIPTION OF HISTORIC PROPERTIES**

- 3.1 Morgan County Bridge No. 224 (NBI No.: 5500142; Select)
- 3.2 Top Notch Farm
- 3.3 East Washington Street Historic District
- 3.4 W.E. Nutter House
- 3.5 Percy Farm and Clear Creek Fisheries
- 3.6 Grassyfork Fisheries Farm No. 1
- 3.7 Reuben Aldrich Farm
- 3.8 Morgan County Bridge No. 166 (NBI No.: 5500153; Select)
- 3.9 Travis Hill Historic District
- 3.10 John Sutton House
- 3.11 Marion County Bridge No. 4315 F (NBI No.: 4900484; Non-Select)
- 3.12 Cleary-Barnett House
- 3.13 Glenn's Valley Nature Park Retreat House
- 3.14 Glenwood Homes Association Historic District
- 3.15 Le Ciel (Charles Laughner House)
- 3.16 Southside German Market Gardeners Historic District
- 3.17 Archaeology Site 12-Mg-0556
- 3.18 Alluvial Floodplain Test Area

**4.0 DESCRIPTION OF THE UNDERTAKING'S EFFECTS ON HISTORIC PROPERTIES**

- 4.1 Morgan County Bridge No. 224 (NBI No.: 5500142; Select)
- 4.2 Top Notch Farm
- 4.3 East Washington Street Historic District
- 4.4 W.E. Nutter House

- 4.5 Percy Farm and Clear Creek Fisheries
- 4.6 Grassyfork Fisheries Farm No. 1
- 4.7 Reuben Aldrich Farm
- 4.8 Morgan County Bridge No. 166 (NBI No.: 5500153; Select)
- 4.9 Travis Hill Historic District
- 4.10 John Sutton House
- 4.11 Marion County Bridge No. 4315 F (NBI No.: 4900484; Non-Select)
- 4.12 Cleary-Barnett House
- 4.13 Glenn's Valley Nature Park Retreat House
- 4.14 Glennwood Homes Association Historic District
- 4.15 Le Ciel (Charles Laughner House)
- 4.16 Southside German Market Gardeners Historic District
- 4.17 Archaeology Site 12-Mg-0556
- 4.18 Alluvial Floodplain Test Areas

**5.0 EXPLAIN APPLICATION OF CRITERIA OF ADVERSE EFFECT – INCLUDE CONDITIONS OF FUTURE ACTIONS TO AVOID, MINIMIZE OR MITIGATE ADVERSE EFFECTS**

- 5.1 Morgan County Bridge 224 (NBI No.: 5500142; Select Bridge)
- 5.2 Top Notch Farm
- 5.3 East Washington Street Historic District
- 5.4 W.E. Nutter House
- 5.5 Percy Farm and Clear Creek Fisheries
- 5.6 Grassyfork Fisheries Farm No. 1
- 5.7 Reuben Aldrich Farm
- 5.8 Morgan County Bridge 166 (NBI No.: 550153 Select)
- 5.9 Travis Hill Historic District
- 5.10 John Sutton House
- 5.11 Marion County Bridge 4513 F (NBI No.: 4900484; Non-Select)
- 5.12 Cleary-Barnett House
- 5.13 Glenn's Valley Nature Park Retreat House
- 5.14 Glennwood Homes Association Historic District
- 5.15 Le Ciel (Charles Laughner House)
- 5.16 Southside German Market Gardeners Historic District
- 5.17 Archaeology Site 12-Mg-0556
- 5.18 Alluvial Floodplain Test Areas
- 5.19 Actions to Avoid, Minimize, and Mitigate Adverse Effects  
*Memorandum of Agreement (MOA)*

**6.0 SUMMARY OF CONSULTING PARTIES AND PUBLIC VIEWS**

## **36 CFR 800.11(e) -- ADDENDUM**

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The addendum documentation summarizes the consultation that took place after the publication of the Draft Environmental Impact Statement (DEIS) and distribution of the “Section 4(f) Compliance Requirements (for Historic Properties) and Section 106 Findings and Determinations: Area of Potential Effects, Eligibility Determinations, Effect Finding” and the “800.11 Documentation of Section 106 Finding of Adverse Effect” to consulting parties and Tribal Consultants.

### **2.0 EFFORTS TO IDENTIFY HISTORIC PROPERTIES**

2.2 Timeline of Consultation

### **4.0 DESCRIBE THE UNDERTAKING’S EFFECT ON HISTORIC PROPERTIES**

4.9 Travis Hill Historic District

4.10 John Sutton House

### **6.0 SUMMARY OF CONSULTING PARTIES AND PUBLIC VIEWS**

## APPENDICES

(Appendix items for individual reports have been removed from that report if they are duplicated as an appendix item in this document)

### M-1 MAPS

APE Map 1 of 4  
APE Map 2 of 4  
APE Map 3 of 4  
APE Map 4 of 4  
Morgan County Bridge No. 224  
Top Notch Farm  
East Washington Street Historic District  
W.E. Nutter House  
Pearcy Farm and Clear Creek Fisheries  
Grassyfork Fisheries Farm No. 1  
Reuben Aldrich Farm  
Morgan County Bridge 166 (NBI No.: 5501531 Select)  
Travis Hill Historic District  
John Sutton House  
Marion County Bridge 4513 F (NBI No.: 4900484; Non-Select)  
Cleary-Barnett House  
Glenn's Valley Nature Park Retreat House  
Glennwood Homes Association Historic District  
Le Ciel (Charles Laughner House)  
Southside German Market Gardeners Historic District

### M-2 REPORTS

July 31, 2006	<i>DRAFT Phase Ia Literature Review Section 6, SR 39 to I-465 at Indianapolis</i>
June 23, 2008	<i>Historic Property Report, SR 39 to I-465</i>
September 2, 2015	<i>Historic Property Report Additional Information, State Road 37 Alternatives (also referred to as "AI No. 1")</i>
November 13, 2015	<i>Phase Ia Archaeological Literature Review for Section 6 Preliminary Alternatives in Hendricks, Johnson, Marion and Morgan Counties</i>
February 29, 2016	<i>Phase Ia Archaeology Survey 1 for Section 6, Indian Creek South of Martinsville to Teeters Road</i>
June 2016	<i>Additional Information Memorandum—No. 2, State Road 37 Alternatives (also referred to as "AI No. 2")</i>
August 1, 2016	<i>Identification of Effects Report</i>

### **M-3 SHPO and THPO Coordination**

June 14, 2004	Letter to DHPA-SHPO describing the APE for Section 6
June 25, 2004	Letter from DHPA-SHPO commenting on APE
June 29, 2004	Letter from Prairie Band Potawatomi Nation regarding Section 106 correspondence
June 29, 2004	Letter to DHPA-SHPO regarding consulting party invitations
July 1, 2004	Letter from Prairie Band Potawatomi Nation regarding correct contact information
July 23, 2004	Invitation to Kick-Off Meeting for Review Agencies
August 12, 2004	Agency Coordination Meeting Agenda and Minutes
January 25, 2005	Invitation to Agency Coordination Meeting
February 23-24, 2005	Agency Coordination Meeting Agenda and Minutes
February 15, 2005	Section 106 Meeting Minutes with DHPA-SHPO, INDOT, and consultants
September 7, 2005	DHPA-SHPO response to Draft HPR
October 24, 2005	Letter to DHPA-SHPO regarding information on Old SR 37 Bridge over Crooked Creek
November 21, 2005	DHPA-SHPO response to additional information regarding Old SR 37 Bridge over Crooked Creek
January 9, 2006	Summary of field tour of historic properties with DHPA-SHPO, INDOT, and consultants
August 24, 2006	I-69 Section 6 Literature Review transmitted to DHPA-SHPO
December 21, 2006	DHPA-SHPO letter responding to Draft Phase Ia Literature Review
June 25, 2008	Letter transmitting HPR to DHPA-SHPO and consulting parties
July 25, 2008	DHPA-SHPO response to the HPR
January 13, 2015	Section 106 Meeting Minutes with DHPA-SHPO, INDOT, and consultants
February 5, 2015,	Letter to DHPA-SHPO regarding revision to the APE, methodology of survey for AI study, and meeting minutes
February 17, 2015	Draft Resource Agency Scoping Meeting Minutes
March 10, 2015	DHPA-SHPO response to meeting minutes, revision to APE, and methodology for survey
March 12, 2015	DHPA-SHPO response to Indianapolis Resource Agency Scoping Meeting
April 27, 2015	DHPA-SHPO transmittal of Section 6 Existing SR 37 Right-of-Way Disturbance Documentation Memorandum and Memorandum on Archaeology Predictive Modeling Methodology Memorandum
May 14, 2015	Meeting Summary of Section 6 site visit
May 15, 2016	DHPA-SHPO letter regarding Draft Purpose & Need statement and conceptual alternatives
May 19, 2015	DHPA-SHPO email regarding properties viewed during site visit on May 14, 2015
May 26, 2015	Existing SR 37 Right-of-Way Disturbance Documentation Memorandum and Memorandum on Archaeology Predictive Modeling Methodology Memorandum

June 30, 2015	Email conveying the Preliminary Alternatives Selection Report via the INDOT website
July 30, 2015	DHPA-SHPO response to Preliminary Alternatives
October 15, 2015	Letter to DHPA-SHPO conveying the renewed invitation to join consultation and a list of invited consulting parties
October 26, 2015	Email from Tribal Archaeologist with Chippewa Cree
November 4, 2015	DHPA-SHPO response to consulting party invitation and list of invited parties
December 2, 2015	Email from Acting THPO United Keetoowah Band of Cherokee Indians in Oklahoma regarding consulting party meeting attendance
December 11, 2015	Email to Acting THPO Miami Tribe of Oklahoma
December 21, 2015	DHPA-SHPO response to December 7, 2015, consulting party meeting and AI No. 1
January 4, 2016	Letter transmitting Phase Ia Archaeological Literature Review to DHPA-SHPO
February 4, 2016	DHPA-SHPO response to Phase Ia Literature Review
March 14, 2016	Letter and transmittal to DHPA-SHPO conveying Phase Ia Archaeology Survey 1 report (Example)
March 23, 2016	Letter to THPOs conveying Phase Ia Archaeology Survey 1 report
March 30, 2016	Transmittal of Preliminary Alternatives Screening Report (PASR): Tier 2 Environmental Impact Statement
April 5, 2016	Email from Miami Tribe of Oklahoma acting THPO regarding the Phase Ia Archaeology Survey 1 report
April 14, 2016	DHPA-SHPO response to Phase Ia Survey 1 report
April 20, 2016	Draft Meeting Minutes from Section 6 Resource Agency Meeting
April 21, 2016	Section 106 Meeting Minutes with DHPA-SHPO Registration and Survey staff, DHPA-SHPO, INDOT, and consultants
May 2, 2016	Section 106 Site visit with INDOT, FHWA, DHPA-SHPO, and consultants
May 11, 2016	DHPA-SHPO letter responded to the Preliminary Screening Report and May 2, 2016, site visit
May 27, 2016	Email from DHPA-SHPO responding to the May 2, 2016, meeting minutes
June 15, 2016	Transmittal conveying AI No. 2
July 14, 2016	DHPA-SHPO response to AI No. 2
August 2, 2016	Effects Report transmitted to DHPA-SHPO
August 26, 2016	Email from DHPA-SHPO regarding Marion County Bridge 4315 F
August 29, 2016	Email to DHPA-SHPO regarding Marion County Bridge 4315 F
September 1, 2016	Letter from DHPA-SHPO regarding the Identification of Effects Report, consulting party meeting, and Marion County Bridge 4315 F
October 28, 2016	Letter conveying additional information about alternatives for the northeast quadrant of I-465 and Bluff Road and Meeting Summary of October 4, 2016

November 28, 2016 DHPA-SHPO response to information about alternative for the northeast quadrant of I-465 and Bluff Road

## **M-4 CONSULTING PARTIES**

### **Consulting Party Meeting Packets**

#### *Consulting Party Meeting No. 1*

June 16, 2004 Invitation to Meeting  
July 2, 2004 Meeting Agenda  
Meeting Slides  
Meeting Summary

#### *Consulting Party Meeting No. 2*

August 15, 2005 Invitation to Meeting  
August 31, 2005 Meeting Agenda  
Meeting Slides  
Meeting Summary

#### *Consulting Party Meeting No. 3*

November 19, 2015 Invitation to Meeting (Consulting Parties and DHPA-SHPO, conveying HPR)  
November 19, 2015 Invitation to Meeting (THPOs, also conveying the archaeology report)  
December 7, 2015 Meeting Agenda  
Meeting Slides  
Meeting Summary  
December 22, 2015 Email conveying meeting summary

#### *Consulting Party Meeting No. 4*

August 2, 2016 Invitation to Meeting (also conveying Effects Reports)  
August 17, 2016 Meeting Agenda  
Meeting Slides  
Meeting Summary  
September 1, 2016 Email conveying meeting summary

#### *Southside German market Gardeners Historic District Meeting*

September 23, 2016 Invitation to property owners (Example)  
October 4, 2016 Meeting Summary  
Sign-in Sheet  
Graphics

### **Consulting Party Correspondence**

May 18, 2004 FHWA Invitation to Potential Consulting Parties  
Postcard Responses  
June 25, 2008 Letter transmitting HPR to DHPA-SHPO and consulting parties (See Appendix D)  
June 21, 2010 Email from Joanne Stuttgen  
October 15, 2015 Invitation to join consultation (See Appendix D)

October 21, 2015	Email from Ann Bilodeau
November 19, 2015	Email to Indiana Landmarks Southwest Field Office
January 26, 2016	I-69 Section 6 and Link Observatory Meeting Minutes
April 7, 2016	Summary of Conversation with owner of the John Sutton House (See Appendix F)
April 19, 2016	Letter acknowledging consulting party acceptance of Charles and Elizabeth Laughner
June 15, 2016	Letter conveying AI No. 2 (See Appendix D)
October 28, 2016	Email conveying availability of consulting party letter

**M-5 CORRESPONDENCE/COMMENTS RECEIVED FROM CONSULTING PARTIES**

September 13, 2005	Letter from Morgan County Historic Preservation Commission
September 13, 2005	Letter from Morgan County Historian
September 14, 2005	Email from Traditional Arts Indiana
December 15, 2015	Letter from Indiana Landmarks
April 7, 2016	Summary of Conversation with owner of the John Sutton House
July 15, 2016	Letter from Joanne Stuttgen
October 6, 2016	Comment from Judy Brehob
October 14, 2016	Comment from Mary Kocher
	Summary of Responses to Consulting Party Comments

**M-6 REPORTS FOLLOWING SECTION 106 FINDING OF ADVERSE EFFECT (MARCH 2017 TO SEPTEMBER 2017)**

June 21, 2017	Phase Ia Archaeological Survey 2 for Section 6
September 8, 2017	Memorandum, Refined Preferred Alternative

**M-7 CORRESPONDENCE/COMMENTS RECEIVED/TRANSMITTED FOLLOWING SECTION 106 FINDING OF ADVERSE EFFECT (MARCH 2017 TO SEPTEMBER 2017)**

March 17, 2017	Email transmitting a letter from FHWA and the “Section 4(f) Compliance Requirements (of Historic Properties) and Section 106 Findings and Determinations: Area of Potential Effects, Eligibility Determinations, Effect Finding” with the 800.11 Documentation of Section 106 Finding of Adverse Effect (Effect Finding and 800.11 Documentation)
March 20, 2017	Email conveying Effect Finding and 800.11 Documentation to THPOs
March 20, 2017	Email transmitting the “e800” document to the Advisory Council on Historic Preservation (ACHP)
April 4, 2017	Signed Publisher’s Affidavit, <i>Daily Journal</i> (Johnson County)
April 4, 2017	Signed Publisher’s Affidavit, <i>Indianapolis Star</i> (Marion County)

April 4, 2017	Signed Publisher's Affidavit, <i>Martinsville Reporter</i> (Morgan County)
April 6, 2017	Letter from the ACHP commenting on Effect Finding and 800.11 Documentation
April 13, 2017	Letter from DHPA-SHPO commenting on Effect Finding and 800.11 Documentation
May 5, 2017	Letter from DHPA-SHPO commenting on Draft Environmental Impact Statement (DEIS)
May 8, 2017	Letter from Indiana Landmarks commenting on Effect Finding and 800.11 Documentation
May 17, 2017	Phase Ia Archaeological Survey 2 transmittal to SHPO
May 18, 2017	Phase Ia Archaeological Survey 2 email transmittal to THPOs
May 18, 2017	Letter from INDOT-CRO to Indiana Landmarks regarding project effects
May 31, 2017	Response letter from Indiana Landmarks to INDOT-CRO
June 6, 2017	Email and letter from the Miami Tribe of Oklahoma
June 12, 2017	Summary of Meeting and Site Visit with Indiana Landmarks
June 19, 2017	Letter from DHPA-SHPO responding to the Phase Ia Archaeological Survey 2 for Section 6
June 27, 2017	Resource Agency Comment/Response Meeting
June 30, 2017	Email to Indiana Landmarks conveying meeting summary
July 5, 2017	Email from Indiana Landmarks acknowledging receipt of meeting summary
July 6, 2017	Email conveying additional information to Indiana Landmarks
July 7, 2017	Letter transmitting revised Phase Ia Archaeological Survey 2 (report dated June 21, 2017)
July 17, 2017	Letter from Indiana Landmarks on project effects
July 26, 2017	Letter from FHWA to the ACHP conveying information packet on objection to individual effect finding
July 27, 2017	Email to consulting parties conveying availability of ACHP packet on INSCOPE
July 27, 2017	Email to THPOs conveying availability of ACHP packet on INSCOPE
July 27, 2017	Email comment from consulting party Marcia Smith
July 27, 2017	Response to Marcia Smith
August 4, 2017	Email from INDOT to IDNR
August 7, 2017	DHPA-SHPO response to revised Phase Ia Archaeological Survey 2
August 14, 2017	Resource Agency Comment/Response Meeting No. 2 Summary and Presentation Materials
August 17, 2017	Response from ACHP regarding review of Criteria for Adverse Effects to Section 6
September 1, 2017	Email from INDOT to IDNR conveying meeting minutes and information

September 13, 2017	Letter from FHWA conveying the Memorandum on the Refined Preferred Alternative (RPA), dated September 8, 2017, and Draft Memorandum of Agreement (MOA), dated September 11, 2017
September 13, 2017	Email to consulting parties conveying the availability of FHWA letter, Memorandum on the RPA, and Draft MOA on INSCOPE
September 13, 2017	Email to THPOs conveying the availability of FHWA letter, Memorandum on the RPA, and Draft MOA on INSCOPE
September 14, 2017	Email comment from consulting party Mel Crichton
September 14, 2017	Letter from DHPA-SHPO commenting on Resource Agency Comment Response Meeting 2 presentation and minutes and written responses to state and federal agency comments, and final meeting minutes of June 27, 2017, DEIS Comment Resolution Meeting Minutes
September 30, 2017	Email from consulting party Marcia Smith
October 3, 2017	Email to consulting party Marcia Smith
October 27, 2017	Letter from FHWA conveying the revised MOA and additional information
October 27, 2017	Additional information letter from FHWA
October 27, 2017	Email conveying the revised MOA and additional information letter from FHWA letter to consulting parties
October 27, 2017	Email conveying the revised MOA to THPOs
November 3, 2017	Letter from DHPA-SHPO concurring with MOA revisions and conveying MOA signature

Summary of Responses to Consulting Party Comments

**M-8 MEMORANDUM OF AGREEMENT**

November 13, 2017 Executed MOA

**FEDERAL HIGHWAY ADMINISTRATION  
DOCUMENTATION OF SECTION 106 FINDING OF ADVERSE EFFECT  
SUBMITTED TO THE STATE HISTORIC PRESERVATION OFFICER  
PURSUANT TO 800.6(a)(3)  
I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDY:  
SECTION 6, SR 39 TO I-465  
DES NO.: 0300382**

## **1.0 DESCRIPTION OF THE UNDERTAKING**

### **1.1 Project Description**

The project is the construction of Section 6 of Interstate 69 (I-69) Evansville to Indianapolis. The Section 6 corridor is located along the State Road (SR) 37 and covers a distance of approximately twenty-six miles through Morgan, Johnson, and Marion Counties before terminating at I-465 in Indianapolis, Indiana. The project also proposes to improve I-465 from approximately Mann Road to United States (US) 31. The I-69 Evansville to Indianapolis project, which is approximately 142 miles in length, is a component of the congressionally designated national I-69 corridor extending more than 2,100 miles from the Canadian border to the Mexican border.

The project area for the SR 37 alternatives of Section 6 is comprised of rural and urban/suburban environments. Those portions of Martinsville and Indianapolis contained within Section 6 are characterized as being predominately clustered modern suburban residential developments along major roads with retail, commercial, and industrial nodes at major intersections and along SR 37. The area becomes more commercial and industrial near Indianapolis. Rural areas of the SR 37 alternatives for Section 6 are characterized by a scattering of commercial and retail businesses along SR 37, with a mix of agricultural land occupied by small farms, modern houses and modern residential developments, and forested land.

The Tier 1 Environmental Impact Statement (EIS) for the I-69 Evansville to Indianapolis project concluded in March 2004. The Federal Highway Administration (FHWA) selected a corridor—Alternative 3C—in its Record of Decision (ROD) and divided the corridor into six Tier 2 sections for detailed study. Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (16 U.S.C. 470f), mandates federal agencies to take into account the effects of their undertakings—i.e., projects wholly or partially funded, permitted, or licensed by a Federal agency—on historic properties. FHWA has allocated federal funds to the Indiana Department of Transportation (INDOT) to use for the Tier 2 Studies of the I-69 Evansville to Indianapolis Project.

On April 29, 2004, FHWA issued a Notice of Intent (NOI) for Section 6 of I-69. In 2006, environmental efforts in I-69 Section 6 were minimized to include only critical management and public outreach activities while other sections of the I-69 undertaking were being completed. On October 15, 2014, FHWA published a revised NOI in the *Federal Register* to advise the public and resource agencies that Tier 2 studies in I-69 Section 6 were resuming. The revised NOI indicated that the range of alternatives may include alternatives outside of the corridor selected in the Tier 1 ROD. All alternatives evaluated connect Section 5 of I-69 in Martinsville with I-465 in Indianapolis. On March 29, 2016, INDOT and FHWA announced that Section 6 would follow the SR 37 corridor.

## 1.2 Area of Potential Effects

Area of Potential Effects (APE): The APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” [36 § CFR 800.16(d)]. The APE for this undertaking incorporates the project area and those areas that might reasonably be affected by the undertaking, using guidance recommended by the INDOT’s Cultural Resources Manual.

In 2004, FHWA in consultation with the Division of Historic Preservation and Archaeology-State Historic Preservation Officer (DHPA-SHPO), utilized an aboveground APE for I-69 Section 6 that centered on the Tier 1 Corridor (Alternative 3C), a 2,000-foot-wide corridor on either side of current SR 37. This APE was expanded or contracted based on topography. It took into account possible interchanges, grade separations, and local access road locations that were known at that time. In some areas of relatively flat relief, the APE was expanded to incorporate any potential physical, temporary and long term visual, atmospheric, or audible impacts or alterations to aboveground resources eligible to be listed in, or listed in, the National Register of Historic Places (NRHP). As required by the Tier 1 ROD and the Tier 1 Memorandum of Agreement (MOA) for Section 106, the southern terminus of the I-69 Section 6 APE overlapped the adjoining APE of I-69 Section 5. DHPA-SHPO concurred with the APE in a letter dated June 25, 2005.

In 2015, after the NOI was issued, the APE from 2004 was re-evaluated. As a basis for expanding or reducing the APE, the historians utilized the largest footprint for all of the SR 37 alternatives, provided on January 30, 2015. After a review of the area, the historians recognized that any reduction of the APE from 2004 would be relatively minor; therefore, historians recommended that the APE established in 2004 should not be reduced since it had been reviewed by consulting parties and concurred with by the DHPA-SHPO in a letter dated June 25, 2004. Along SR 37, where there was less than a 2,000 foot buffer from the most recent SR 37 alternatives, the APE was expanded to approximately 2,000 feet from the mainline so as to take into account possible effects at these locations. In general, the areas of expansion in 2015 occurred where overpasses and interchanges might be built. Along I-465 (an already existing highway), the APE was drawn to be only 1,000 feet on either side of the interstate, a methodology consistent with the Tier 1 APE. (The Tier 1 APE was drawn 1,000 feet on either side of I-70.) DHPA-SHPO concurred with the revised APE in a letter dated March 10, 2015.

When design plans were further refined in 2016, project historians again examined the appropriateness of the APE. Consistent with the methodology utilized during the previous surveys for I-69 Studies, in areas where a new terrain road was introduced, historians extended the APE one mile initially and then reduced the APE as the topography and other environmental factors warranted. Historians drew the APE to extend at least 1,000 feet along I-465 and 1,000 feet from any access road that was included in the new design plans.

Modifications to the APE in 2016 took into account interchanges, overpasses, and changes to the project footprint not previously shown on plans for Alternatives C1, C2, and C3. The APE from 2015 was modified in areas where revised plans showed right-of-way extending beyond the boundary of the APE, or where the proposed new right-of-way was closer than 1,000 feet to the outer edge of the APE, or where a new potential detour route for local traffic might occur outside the APE. Specifically, the APE was expanded at I-465, Smith Valley Road to Morgantown Road, Travis Road to Mullinix Road, Egbert Road, Robin Run Court, and Jordan Road/Burton Lane. (See Appendix M-1: Maps.) DHPA-SHPO concurred with the modified APE in a letter dated July 14, 2016.

The APE for archaeological resources, per 36 CFR 800.16(d), has been defined through consultation with the DHPA-SHPO as the right-of-way for the preferred alternative; thus, the archaeological APE is the project footprint.

## **2.0 EFFORTS TO IDENTIFY HISTORIC PROPERTIES**

Historic property evaluations for I-69 Section 6 have been conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, 54 U.S.C. 302, and its implementing regulations, 36 CFR Part 800 (2016). Historic properties include buildings, structures, sites, objects, and/or districts. All work described in this section was conducted by qualified professionals who meet the standards set forth by the U.S. Department of the Interior in 36 CFR Parts 61 and 68 and the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (48 FR 44716). These qualified professionals are registered with DHPA-SHPO.

### **2.1 Data Collection**

#### *2004-2008 Study*

Pursuant to 36 CFR § 800.4(b), project historians conducted a literature review to identify previously inventoried aboveground resources located in the APE of Section 6 in May and June 2004. The historic context for Southwestern Indiana and data on potentially eligible aboveground resources from the I-69 Tier 1 Study formed the baseline for the study. Historians reviewed published literature for information pertinent to the history and architecture of Morgan, Johnson, and Marion Counties before delving into more specific research topics. They conducted research in the Indiana Historic Sites and Structures Inventory (IHSSI) located at the DHPA-SHPO, the list of properties included in the NRHP and the Indiana Register of Historic Sites and Structures (State Register), and DHPA surveys of historic bridges and railroad resources. Research was conducted at the Indiana State Library, Indiana State Archives, Indiana Historical Society, Marion County Public Library in Indianapolis, Morgan County Public Library in Martinsville, and Johnson County Library in Franklin. Project historians reviewed primary and secondary resources, such as state and county histories, atlases, and maps, newspaper clipping files, historic aerial photographs, and the United States Census records. Interviews were conducted in some cases with local historians or residents who were knowledgeable about the history of a particular resource or area.

Ongoing consultation occurred with the staff of the DHPA-SHPO, with respect to eligibility and to specific types of historic resources. Other individuals and organizations were consulted for specific information or for knowledge of historic trends and resources. Consultation occurred with the Morgan County Historian, Traditional Arts Indiana, and the Morgan County Historic Preservation Society.

On July 2, 2004, a consulting party<sup>3</sup> meeting was held, at which time the project team asked consulting parties for information regarding known historic properties. See Appendix M-4: Consulting Parties, for a copy of the invitation, agenda, presentation materials, and meeting minutes; the first consulting party meeting is briefly summarized below.

To conduct the survey, project historians drove all the roads in the APE to identify and document aboveground resources. Aboveground resources were examined to determine whether they were of an age to be eligible for listing in the NRHP, i.e., at least fifty years of age (built before 1955). Then

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<sup>3</sup> Section 2.3 and Appendix M-3 of this document contain a list of tribes and consulting parties that agreed to join in consultation.

aboveground resources were further examined to determine whether they retained sufficient integrity to receive a rating, per the IHSSI. Resources with sufficient integrity were photographed and surveyed, and location notes were recorded. A total of 113 resources were identified as meriting a Contributing, Notable, or Outstanding rating, including sixty-four properties that had not been previously documented. Ten IHSSI properties were found to be demolished. Historians carefully reviewed the field data, looking for concentrations of similarly styled buildings or structures that might be connected by historic theme. They found a number of historic farmsteads but none in such proximity and with such integrity that the collection would constitute a historic district. Further, they encountered the resources related to fisheries in and around Martinsville and explored the Bill Diddle-designed golf course at the Martinsville County Club along SR 37.

In July through December 2004, supplementary research was conducted as more intensive fieldwork progressed to gather additional information on individual properties and to develop the historic context for the APE (1800 to 1955). On January 10, 2005, an informal discussion was held with the Chief of Registration and Survey at the DHPA-SHPO to discuss integrity and significance of the following property types or specific properties: bridges, Aldrich Farm, Sutton House, Nutter House, Top Notch Farm, and Grassyfork Fisheries.

A Draft Historic Property Report (HPR) was published in summer 2005 and discussed at the Second Consulting Party Meeting held August 31, 2005. See section 2.4 of this document for a brief meeting summary and Appendix M-4: Consulting Parties for a copy of the invitation, agenda, presentation materials, and meeting minutes. Historians noted that the East Washington Street Historic District (NR-1313) was listed in the NRHP in 1997 and recommended the following properties as eligible for listing in the NRHP:

- Morgan County Bridge No. 224 (NBI No. 55001421; IHSSI No. 109-386-60030);
- Top Notch Farm (IHSSI No. 109-386-60028);
- W.E. Nutter House (IHSSI No. 109-386-64053);
- Grassyfork Fisheries (IHSSI No. 109-386-60012);
- Stockwell Bridge (IHSSI No.: 109-386-60053; NBI No.: 5500043);
- Morgan County Bridge No. 166 (109-428-30017; NBI No.: 5500153); and
- John Sutton House (IHSSI No. 081-031-10002).

In a letter dated September 7, 2005, DHPA-SHPO requested additional data as to why the Old SR 37 Bridge over Crooked Creek<sup>4</sup> had been not considered eligible. On October 24, 2005, additional data was provided to the DHPA-SHPO. On November 21, 2005, DHPA-SHPO replied that based on the additional information, the office did not have “any further concerns regarding the bridge.” See Appendix M-3: DHPA-SHPO and Tribal Historic Preservation Officer (THPO) Coordination.

On August 28, 2006, a Draft Phase Ia [Archaeological] Literature Review Section 6, SR 39 to I-465 (Trader 7/31/06) was received by the DHPA-SHPO. On December 21, 2006, DHPA-SHPO responded to that report with comments and questions. See Appendix M-2: Reports, and Appendix M-3: DHPA-SHPO and THPO Coordination.

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<sup>4</sup> Note that this bridge does not have an NBI number or a county bridge number because it is located on an abandoned stretch of Old SR 37.

The final HPR published in 2008, formalized the recommendations of the draft Historic Property Report. See Appendix M-2: Reports for the Historic Property Report published in 2008.

On July 25, 2008, DHPA-SHPO responded that the staff agreed “with the recommendations in the HPR regarding the eligibility or ineligibility” of resources in Section 6. See Appendix M-3: DHPA-SHPO and THPO Coordination.

No other comments were received at that time.

### *2015-2016 Study*

As noted above, the NOI was issued on October 15, 2014. In 2015, in advance of re-initiating consultation, INDOT charged historians with conducting an Additional Information (AI) Study, with the purpose of identifying and evaluating properties that had come “of age” since the last survey or properties that may have achieved significance in the past ten years. In order to initiate the AI survey, project historians met with staff of the DHPA-SHPO, INDOT-Cultural Resources Office (CRO) and FHWA on January 13, 2015, to discuss an identification and evaluation methodology of the recent past properties prior to beginning the survey. Then on February 17, 2015, additional information regarding the project was provided to the DHPA-SHPO staff at a Resource Agency Meeting. See Appendix M-3: DHPA-SHPO and THPO Coordination for a copy of the meeting minutes.

On March 10, 2015, the staff of the DHPA-SHPO sent a letter that expressed concern about using the guidelines in the 3.C.1 National Cooperative Highway Research Program (NCHRP) Report 723, “A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing” that historians had proposed using and asked that the guidelines prepared by the DHPA-SHPO be followed as well. A follow up conference call on March 13, 2015, resulted in agreement to use “Guidelines for Evaluating National Register Eligibility of Mid Century Modern Housing and Post-War Suburbs,” a handout about eligibility of recent past properties, provided by DHPA as part of Section 106 Seminar on February 20, 2015, instead of NCHRP Report 723. See Appendix M-3: DHPA-SHPO and THPO Coordination for letter from the DHPA-SHPO.

As part of the AI Study, historians conducted a review of the NRHP, National Historic Landmark (NHL) Program, State Register, Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER), State Historical Architectural and Archaeological Research Database (SHAARD), IHSSI, *Morgan County: Interim Report*, *Johnson County: Interim Report*, *Marion County, Decatur, Perry, and Franklin Townships: Interim Report*, and the *Indiana Historic Bridge Inventory* for previously identified properties. Historians carefully reviewed the I-69 Section 6 Tier 2 HPR (2008) and the results of the Section 106 consultation for this undertaking. The historians further reviewed the prior AI studies for other sections of I-69 for relevant historical and architectural trends within the I-69 APE.

In conducting research for the AI study, historians examined primary and secondary resources. Historians conducted research at the Indiana State Library, Indiana Historical Society Library, Johnson County Public Library, Johnson County Historical Society, Indianapolis Historic Preservation Commission, the Department of Metropolitan Development for the City of Indianapolis, Marion County Assessor’s Office, Marion County Clerk’s Office (microfilm records), Indianapolis Division of Planning, Indianapolis Division of Parks and Recreation, Johnson County Plat Office, and Johnson County Recorder’s Office.

Documentary research for the project included a review of county histories, city directories, historic photographs, county historic topographical maps (USGS), historic aerials, historic fire insurance maps, plat maps, and online resources. Mapping and aerial photographs available through Indiana University Libraries and City of Indianapolis websites were especially helpful.

Consultation occurred with the Eli Lilly & Company Archivist; a representative from the Perry Township/Southport Historical Society; seven property owners of homes in the Glennwood Homes Association neighborhood; the president of Glenn's Valley Conservation Club; the pastor and a board member of Glenn's Valley United Methodist Church; a representative of the Indianapolis Division of Planning; a representative of the Indianapolis Department of Parks and Recreation; the Chief of Registration and Survey at the DHPA-SHPO; the staff of the SHPO; and fifteen private citizens with an interest in the project.

In order to begin identification, the historians assembled data from the 2004/2005 survey, SHAARD, and other Section 106 projects that historians had conducted over the past years. In addition, they geo-rectified and reviewed historic-era and modern topographical quadrangle maps in order to collect known data that would serve as a baseline for the survey. This assemblage of data helped identify subdivisions constructed between 1955 and 1972.<sup>5</sup> Topographical maps were compared to available Geographic Information System (GIS) data to determine date of construction for properties built between 1955 and 1980 that are not in subdivisions. Note that quadrangle maps for much of this area are based on a 1965 map, "Photo Revised" to 1980. In order to further refine the number of properties to survey, W&A researched county GIS databases to define those properties constructed during, or prior to, 1972.

Sample research was conducted on identified subdivisions constructed between 1965 and 1980 to ascertain those with the majority of homes constructed during, or prior to, 1972. The staff reviewed available USGS aerial photographs (available at <http://earthexplorer.usgs.gov/>) and obtained select historic aerials for the APE for Morgan, Johnson, and Marion Counties to augment the data on the topographical maps and county GIS. In this way, they were able to identify individual properties constructed between 1955 and 1972 as much as possible prior to survey.

Then a reconnaissance-level survey was conducted to verify the existence and general status of properties rated Contributing or higher in the previous survey (2004/2005; HPR, 2008) and to survey properties constructed during, or prior to, 1972 in parts of the APE that been expanded since the earlier survey. The historians took photos with embedded Global Positioning System (GPS) data of properties built between 1955 and 1972 within the original APE. Historians used ArcGIS Collector to record location information and tie that information with photographs of properties. ArcGIS Collector assigned a numeric identification (Field Identification Number [FID]) to each recorded location, which was used as the survey number for new or previously unrecorded properties.

Historians reviewed all properties included in the 2004/2005 survey from public right of way to ascertain if there were obvious changes in status. (It was during this endeavor that historians recognized that the status of the Reuben Aldrich Farm had changed as the pool of nearby existing agricultural resources had diminished.) It was also during this survey that they identified and documented properties within the 2004 APE that had been surveyed in the IHSSI but not documented in the HPR (2008).

Per discussions with DHPA-SHPO, historians evaluated subdivisions and neighborhoods as a whole for NRHP eligibility. This began with a reconnaissance-level survey considering each development as a district. Staff took representative photos of buildings, streets, and landscape elements within the subdivision, sometimes video recording the district in order to document the relationships between the buildings, streets, and landscape elements. They also made notes on building forms, styles, layout, and design, when appropriate. Historians noted for further study those subdivisions and neighborhoods that

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<sup>5</sup> In consultation with INDOT-CRO, the historians utilized the date of 1972 because it is 50 years prior to the issuance of the NOI, plus five years to account for the likely time for the process for the National Environmental Policy Act (NEPA) process to be concluded and for the I-69 Section 6 project to be approved.

appeared to possess a higher level of integrity. In all, the historians recorded 1,047 individual resources and created 115 recordings of subdivisions.

Keeping in mind prior consultation with the staff of DHPA-SHPO, historians then began a review of the reconnaissance-level photographs and digital video recordings taken of all properties constructed between 1955 and 1972 in the APE. Staff members individually evaluated the rating of the properties that had been assigned in the field and then met to discuss any changes in rating that ought to be made. For individual resources of Mid-Century Modern or Ranch styles, historians looked for properties with a high level of integrity; most properties of this vintage have been modified with modern vinyl garage doors, replacement windows, and/or new entry doors. These changes seemed very evident, given the relatively modest architectural scale and profile of many of these properties. However, minor changes did not disqualify a property if it appeared to be a good example of type, architect-designed, or to present more architectural refinements than one would anticipate in a standard house from the period.

More intensive research began then as historians updated the historic context for the recent past to ascertain historic significance for properties that might be eligible for Criteria A and B. Field visits were conducted on properties that might be eligible or that could not be viewed during the reconnaissance-level survey from public right of way.

Historians also conducted an intensive-level survey of subdivisions or neighborhoods that appeared to possess integrity in terms of individual dwellings but also in terms of design trends (such as common setbacks and landscaping). Where appropriate, historians conducted background research on the neighborhood/subdivision, its occupants, and/or the neighborhood's builder/developer and/or compared it to others previously listed in the NRHP in Indiana in order to establish and evaluate significance under Criteria A and C. At times this took the form of looking at the "core"—the architectural or design essence of a subdivision—as requested by the DHPA-SHPO. For significance under Criterion C, this core reflects a style or design trend, has high integrity, is architect or master-builder designed, has few "typical stock designs," and can be quantified as locally significant. Those subdivisions that appeared to possess a moderate or higher eligibility potential were marked for consultation with the DHPA-SHPO.

During this evaluation, a field meeting with the agencies, including the staff of DHPA-SHPO was held on May 14, 2015. The purpose of this visit was to discuss field methodology and to review those individual resources and districts that could be eligible for listing in the NRHP and to contrast those with individual resources and districts the historians considered not eligible. After this meeting, the historians conducted targeted research to answer questions that arose during the field visit. See Appendix M-3: DHPA-SHPO and THPO Coordination, for meeting summary.

Finally, historians reviewed all surveyed properties once more and documented those individual resources receiving a Contributing rating (consistent with DHPA survey standards) or higher in a property table.

In keeping with survey methodology of the DHPA, neighborhoods were considered either eligible or not eligible for listing in the NRHP and no neighborhood is considered to have Contributing status. NRHP-eligible neighborhoods were discussed in *Historic Property Report Additional Information* ("AI No. 1").

Historians published the *Historic Property Report Additional Information* ("AI No. 1") on September 2, 2015, and the report was made available to consulting parties, the THPOs who had accepted consultation, and the DHPA-SHPO on November 19, 2015.<sup>6</sup> The report identified the resources recommended as

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<sup>6</sup> Section 2.3 and Appendix M-3 of this document contain of list of tribes and consulting parties that agreed to join in consultation.

eligible for listing in the NRHP in the HPR (2008) and noted that the Grassy Forks Fisheries had been listed in the NRHP as the Grassyforks Fisheries Farm No. 1 since the publication of the HPR in 2008. Also, since the publication of the HPR, the *Indiana Historic Bridge Inventory* (2009) had identified the following bridges as NRHP-eligible: Marion Co. Br. 4513F (NBI No. 4900484), Morgan Co. Br. 166 (IHSSI No.: 109-428-30017; NBI No. 5500153), Morgan Co. Br. 224 (IHSSI No.: 109-386-60030; NBI No. 5500142), and Stockwell Bridge/Morgan Co. Br. 56 (IHSSI No.: 109-386-60053; NBI No.: 5500049)<sup>7</sup>. Additionally, the following resources were recommended eligible for listing in the NRHP: Southside German Market Gardeners Historic District, Glennwood Homes Association Historic District, Travis Hill Historic District, Le Ciel (Charles Laughner House), Cleary-Barnett House, Glenn's Valley Nature Park Retreat House (IHSSI No.: 097-392-85416), and Reuben Aldrich Farm (IHSSI No.: 109-428-30009). See Appendix M-2: Reports, for the AI No. 1.

SHPO agreed with the recommendations of eligibility in the report in a letter dated December 21, 2015. See Appendix M-3: DHPA-SHPO and THPO Coordination.

In 2016, the APE was expanded to account for impacts that might occur as a result of design changes to Alternatives C1, C2, and C3. Historians utilized the same methodology as previously used in 2015, taking into account interchanges, overpasses, and changes to the project footprint not previously shown on plans for the three alternatives, especially in those areas where design plans extended beyond the boundary of the APE, or where the proposed new right of way is closer than 1,000 feet to the outer edge of the APE, or where the potential detour route for local traffic would occur outside the APE.

Historians employed the research and survey methodology utilized in the AI No. 1 (2015). The historic context from that report informed the evaluations for this project. Since the areas of expanded APE had not been surveyed or documented in the HPR (2008), any property constructed prior to 1955 meriting a rating of Contributing or higher was documented and photographed. Any housing addition constructed between 1955 and 1972 was digitally recorded on video.

Historians again reviewed the NRHP, NHL Program, State Register, HABS/HAER, SHAARD, IHSSI, *Morgan County: Interim Report*, *Johnson County: Interim Report*, *Marion County, Decatur, Perry, and Franklin Townships: Interim Report*, the *Indiana Historic Bridge Inventory*, I-69 Section 6 Tier 2 HPR (2008), AI No.1 (2015), and the results of the Section 106 consultation for this undertaking. Documentary research for the project included a review of county histories, historic photographs, county historic topographical maps (USGS), historic aerials, plat maps, and on-line resources. Mapping and aerial photographs available through Indiana University Libraries and the City of Indianapolis websites were especially helpful.

Historians obtained information from the owner of the Percy House and Clear Creek Fisheries (IHSSI No.: 109-386-60015). Further, historians consulted with the Chief of Registration & Survey at the DHPA-SHPO about eligibility in a meeting held April 21, 2016, and later with the staff of DHPA-SHPO in a site visit held May 2, 2016. (See Appendix M-3: DHPA-SHPO or THPO Coordination, for the summary of that site visit.)

A reconnaissance-level survey was conducted in March 2016 and concluded with an intensive-level survey in April 2016. The historians took photos with embedded GPS data of all surveyed properties within the expanded APE and used ArcGIS Collector to record location information and tie that information to photographs of properties. ArcGIS Collector assigned a numeric identification to each recorded location, which was used as the survey number for new or previously unrecorded properties. For

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<sup>7</sup> Note that during a site visit in March 2016, historians found that the Stockwell Bridge had been demolished and replaced.

subdivisions and neighborhoods, a reconnaissance-level survey was conducted to assess the area's potential as a district, using the same methodology as employed in 2015. Those resources that did not meet at least one of the NRHP criteria and/or did not retain integrity were recommended not to be eligible for listing in the NRHP during this evaluation process.

Following the reconnaissance, consultants met with staff of INDOT and DHPA-SHPO to discuss a potentially eligible resource within the expanded APE on April 21, 2016. (That meeting also included a discussion of the status of the Southside German Market Gardeners Historic District identified in AI No. 1.) On May 2, 2016, a Section 106 tour was provided to the DHPA-SHPO to review the relationship of the undertaking to historic resources, to discuss properties within the expanded APE, and to review the Southside German Market Gardeners Historic District. At that meeting, historians conveyed the results of research conducted on the history of the houses surrounding I-465 in the Southside German Market Gardeners Historic District. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a meeting summary.

The AI Memorandum No. 2 ("AI No. 2") was completed in June 2016 and made available to SHPO, THPOs, and consulting parties on June 15, 2016. The historians identified fifty-seven resources considered or rated Contributing or higher and recommended the Percy Farm and Clear Creek Fisheries (IHSSI No. 109-386-60015) as eligible for listing in the NRHP. See Appendix M-2: Reports, for AI No. 2.

SHPO concurred with the recommendation of the AI No. 2 in a letter dated July 14, 2016. See Appendix M-3: DHPA-SHPO and THPO Coordination, for letter.

### *Archaeology*

Per 36 CFR 800.4(b)(2), a phased approach has been developed and used to accomplish Tier 2 archaeological research and evaluation tasks. For the I-69 Tier 2 EIS, archaeological research included literature review, background research, and site files research at DHPA-SHPO and other pertinent repositories. Information pertaining to previously recorded sites within a 2,000-foot-wide study corridor, identified in the Tier 1 EIS, was gathered in 2006. The information was updated and expanded in 2015 to include previously documented archaeological sites within the Section 6 Preliminary Alternatives study area encompassed by the five Preliminary Alternatives B, D, C, K3 and K4 and a 1.5-mile (mi) buffer.

Information gathered during the archaeological literature review of the DHPA-SHPO site files indicated that there are 496 previously-recorded archaeological sites within the Section 6 Preliminary Alternatives study area. Site type, defined in the Tier 1 study, refers to the general period (prehistoric, historical, or both) of the site. If a site file did not list a temporal period, it was categorized as unidentified. Examination of the site types within Section 6 revealed that they span prehistoric, historical, and multicomponent prehistoric/historical periods.

The November 2015 *Phase Ia Archaeological Literature Review for Section 6, Preliminary Alternatives in Hendricks, Johnson, Marion and Morgan Counties* detailed the results of the archaeological literature review for the Section 6 Preliminary Alternatives study area. This information was incorporated into the February 2016 *Phase Ia Archaeological Survey 1 for Section 6, Indian Creek South of Martinsville to Teeters Road, Morgan County*. See Appendix M-2: Reports, for a Management Summary.

A Phase Ia archaeological survey of portions of the Section 6 APE common to Alternatives B, D, K3, and K4 and Preferred Alternative C through Martinsville was conducted in 2015–2016. The Phase Ia field investigations employed a combination of field methods. These methods, along with the results of the archaeological survey are presented in the Phase Ia archaeological report.

*Shovel Testing* was utilized in areas where ground surface visibility was less than 30%. This method consists of excavating 30-centimeter (cm) diameter shovel tests at 10-meter (m) or 15-m intervals (the intervals were decreased to 5 m when delineating the perimeter of an archaeological site). Intervals of 30 m were used in instances to confirm existing disturbances, such as road shoulders and residential landscaped yards. Shovel tests were excavated to a depth that penetrated subsoil by a depth of 10 cm or the maximum possible depth. The fill from these shovel tests was screened through 0.25-inch (in), hardware cloth; all artifacts encountered were collected and provenienced to the shovel test and in relation to the soil horizons. A record was kept for all shovel tests excavated. This record includes soil profile, soil texture, Munsell soil color, and presence/absence of cultural materials. Landform boundaries, negative shovel probes, or project area limits determined recorded site boundaries. In areas of subsurface disturbance, the interval between shovel tests was increased or soil coring was substituted at the discretion of the field supervisor.

*Surface Survey/Collection* was utilized in areas where the ground surface permitted at least 30% visibility. In most of these areas, the tilled fields exhibited ground surface visibility exceeding 80%. This method consists of visually examining the ground surface at a maximum of 10-m intervals. Once cultural materials were discovered, intervals no greater than 5 m were utilized in the site area and its vicinity. Typically, one or more shovel tests were excavated in the sites identified during the surface collection to better characterize soil conditions and artifact distributions in those site areas.

Field notes and map notations were employed to record area designations, field conditions, located sites, and methods of investigation. Similar notes were taken for each site and included observations, methods of investigation, site size, and slope gradient, and direction. Notes were retained for all shovel probes, and include information on Munsell soil color, soil texture, presence/absence of cultural materials, and stratigraphy. All artifacts located in the field were bagged, with the date and provenience marked on the bag. At least one shovel test was excavated at every site surveyed, even if it was discovered by surface survey, in an effort to gain information on site stratigraphy. All site boundaries were recorded by GPS to sub-meter accuracy.

The 2015/2016 Phase Ia archaeological investigations within portions of the project area common to Alternatives B, D, K3, and K4 and preferred alternative C identified seven previously unrecorded archaeological sites. The sites included: three prehistoric isolated finds, one prehistoric artifact scatter, one historical artifact scatter, one historical house site, and one multicomponent prehistoric/historical scatter. One previously unrecorded site, a historic school, was located immediately adjacent to the northern end of the survey area but was not intensively investigated. One previously recorded Late Prehistoric village site, the Martinsville Plaza site (12-Mg-0052), was mapped within the APE but the site area was found in disturbed area and no cultural material was observed. Of the nine sites examined during the 2015-2016 archaeological investigations, seven were recommended as not eligible for inclusion in the NRHP (36 CFR 60.4[d]), and no additional archaeological investigations were recommended for these sites. Site 12-Mg-0556 was identified immediately adjacent to the survey area and was not intensively investigated or evaluated. Site 12-Mg-0556 had insufficient data for an eligibility determination, and additional investigation was recommended if it cannot be avoided by the project. Phase Ia investigation and NRHP evaluation of this site will be undertaken by future survey. Portions of Site 12-Mg-0052 within the APE were found unlikely to contain intact deposits and no further investigation was necessary within the APE. However, the site boundaries should be marked and identified as a sensitive resource. One area south of Martinsville in the White River valley was identified with a high potential for buried cultural deposits, and a Phase Ic subsurface investigation was recommended. (See Appendix M-2: Reports, for a management summary.) It is anticipated that the Phase Ic survey will be developed in consultation with the DHPA-SHPO.

Those portions of the I-69 Section 6 archaeological APE that have not yet been surveyed for archaeological sites will be investigated through a Phase Ia archaeological survey prior to preparation of the Final EIS (FEIS). Should potentially significant sites be identified during the Phase Ia surveys, additional testing through Phase Ib, Ic, or Phase II may be recommended to evaluate eligibility for the NRHP. The 2015-2016 Phase Ia survey identified one area south of Martinsville in the White River valley that requires a Phase Ic subsurface investigation. Site 12-Mg-0556 was encountered immediately adjacent to the northern end of the survey area that remains unevaluated and will require additional investigation during the next Phase Ia survey. The Phase Ia, Ib, Ic, or Phase II surveys may be completed prior to the publication of the FEIS. If they are not completed before the FEIS is published, the FEIS will include an MOA or Programmatic Agreement (PA) developed in consultation with the DHPA-SHPO. The MOA would include commitments to complete these Phase Ib, Ic, or Phase II surveys, including appropriate mitigation commitments in the event that NRHP-eligible sites are identified and would be adversely impacted or if additional archaeological survey work is warranted. If the results of this additional testing show that a Phase III is warranted, that work will be completed before construction on the project could begin at that site.

## **2.2 Timeline of Consultation<sup>8</sup>**

**May 18, 2004:** FHWA sent letter and response card to potential consulting parties, including Native American Tribes, inviting them to participate as consulting parties for Tier 2. The letter directed invitees to the Advisory Council on Historic Preservation (ACHP) website to obtain more information about the Section 106 process.

**May-July 2004:** FHWA received postcard and general responses from prospective consulting parties, including Native American Tribes.

**June 14, 2004:** Letter sent to DHPA-SHPO describing the APE for the Section 6 undertaking.

**June 16, 2004:** Invitation to the first consulting party meeting on July 2, 2004; included was map of the APE and list of potentially eligible properties identified in the Tier 1 study included.

**June 25, 2004:** DHPA-SHPO sent letter stating that the APE “appears to be appropriate.”

**June 29, 2004:** Letter sent to DHPA-SHPO with list of consulting parties for review and inviting DHPA-SHPO to submit additional consulting parties.

**June 29, 2004:** Letter from Prairie Band Potawatomi Nation stated they had “no objections” to the I-69 Section 6 project.

**July 2, 2004:** Consulting party meeting held to discuss the Section 106 process, the role of consulting parties, the APE, and next steps.

**July 23, 2004:** Early coordination with the SHPO: first environmental resource agency coordination meeting invitation sent, with all Tier 2 project sections.

**August 12, 2004:** Environmental resource agency meeting.

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<sup>8</sup> Copies of correspondence with agencies may be found in Appendix M-3: DHPA-SHPO and THPO Coordination; copies of correspondence with consulting parties may be found in Appendix M-4: Consulting Parties.

**January 10, 2005:** Meeting held with DHPA-SHPO to discuss: eligibility of bridges, Reuben Aldrich Farm, John Sutton House, W. E. Nutter House, Top Notch Farm, and Grassyfork Fisheries.

**January 25, 2005:** Invitation to environmental resource agency coordination meeting and field trip sent.

**February 15, 2005:** Meeting held with DHPA-SHPO to discuss documentation to be included in the forthcoming HPRs for all sections.

**February 23-24, 2005:** Coordination continued with the DHPA-SHPO via second environmental resource agency coordination meeting and field trip.

**August 15, 2005:** Invitation sent for a consulting party meeting on August 31, 2005, to discuss properties listed or eligible for listing in the NRHP. Enclosures included appropriate sections of the HPR. A full draft HPR was provided to DHPA-SHPO.

**August 31, 2005:** Consulting party meeting held to discuss the Section 106 – Findings of Eligibility for Section 6.

**September 7, 2005:** DHPA-SHPO responded to the HPR; staff expressed concerns for the Morgan County Bridge carrying Old SR 37 Bridge over Crooked Creek<sup>9</sup> and requested additional information.

**October 24, 2005:** Letter with additional information sent to the Indiana DHPA-SHPO responding to concerns with the Morgan County Bridge carrying Old SR 37 over Crooked Creek.

**November 21, 2005:** DHPA-SHPO responded to additional materials provided in correspondence of October 24, 2005, and stated they had no further concerns.

**January 9, 2006:** Field review held to assess preliminary project effects on historic resources and cemeteries.

**August 24, 2006:** *Draft Phase Ia [Archaeological] Literature Review Section 6, SR 39 to I-465* submitted to the DHPA-SHPO.

**December 21, 2006:** DHPA sent a letter highlighting issues to address in the *Draft Phase Ia [Archaeological] Literature Review Section 6, SR 39 to I-465*.

**June 25, 2008:** Letter sent to consulting parties with a CD copy of the revised HPR.

**July 25, 2008:** DHPA-SHPO concurred with the eligibility and ineligibility recommendations in the HPR.

**January 13, 2015:** Meeting held with INDR-DHPA-SHPO to discuss the project approach for the SR 37 AI Study.

**February 5, 2015:** Meeting summary, revised APE, and Memorandum on Methodology for AI Study sent to DHPA-SHPO.

**February 17, 2015:** Resource agency scoping meeting/webinar held to review and receive resource agency comments purpose and need and preliminary alternatives.

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<sup>9</sup> This bridge does not have an NBI of Bridge number because it is located on an abandoned stretch of Old SR 37.

**March 10, 2015:** DHPA-SHPO responded to materials transmitted on February 5, 2015, and offered comments on survey methodology and NRHP evaluation guidelines for recent past properties.

**March 12, 2015:** DHPA-SHPO responded to meeting held February 17, 2015. No comments offered on the I-69 Section 6 draft purpose and need but stated significant cultural resources are within and near the SR 37 corridor.

**April 27, 2015:** Memorandum on Existing SR 37 Right-of-Way Disturbance and Memorandum on Archaeology Predictive Modeling sent to the DHPA-SHPO.

**May 14, 2015:** Site visit held with agencies to review select recent past individual resources and subdivisions/neighborhoods in the APE.

**May 15, 2015:** DHPA-SHPO responded to the “Draft Purpose & Need Statement and Conceptual Alternatives for I-69 Studies for Section from Martinsville to Indianapolis.”

**May 19, 2015:** DHPA-SHPO Survey and Registration staff responded to the properties presented at the site visit on May 14, 2015.

**May 26, 2015:** DHPA-SHPO agreed with Memorandum on Existing SR 37 Right-of-Way Disturbance and Memorandum on Archaeology Predictive Modeling.

**June 30, 2015:** INDOT emailed web site link to the I-69 Section 6 Preliminary Alternatives Screening Report to resource agencies.

**July 30, 2015:** DHPA-SHPO sent a letter to FHWA regarding the preliminary alternatives. It was stated that not enough information was submitted with four of the five alternatives. No specific comments about the preliminary alternatives were made.

**October 15, 2015:** FHWA re-initiated consultation with a group of former and newly identified parties with a demonstrated interest to join in consultation.

**October 15, 2015:** DHPA-SHPO sent a copy of the consulting party invitation and the list of potential consulting parties.

**October-December 2015:** FHWA received postcard and general responses from prospective consulting parties, including Native American Tribes.

**November 4, 2015:** DHPA-SHPO provided comments on the consulting party list.

**November 19, 2015:** Consulting parties notified that AI No. 1 was available on INDOT’s website IN-SCOPE and invited to a consulting party meeting on December 7, 2015, to discuss project updates and the AI No. 1. A separate letter was sent to Native American Tribes that also included the results of the *Phase Ia Archaeological Literature Review, Section 6 Preliminary Alternatives in Hendricks, Johnson, Marion and Morgan Counties, Indiana, I-69 Tier 2 Studies, Evansville to Indianapolis*.

**December 7, 2015:** I-69 Section 6 consulting party meeting held to discuss the results of the AI No. 1 and to provide an update on archaeology.

**December 21, 2015:** DHPA-SHPO concurred with recommendations of the AI No. 1.

**December 22, 2015:** Meeting minutes (December 7) sent via email to consulting parties; paper copies distributed to those who did not provide an email address.

**January 4, 2016:** *Phase Ia Archaeological Literature Review* sent to DHPA-SHPO for review and comment.

**February 4, 2016:** DHPA-SHPO concurred with the recommendations in the Phase Ia Archaeological Literature Review, stating that once an alternative has been chosen, a Phase Ia archaeological reconnaissance should be conducted.

**March 14, 2016:** *Phase Ia Archaeological Survey Report* mailed to DHPA-SHPO.

**March 23, 2016:** *Phase Ia Archaeological Survey Report* mailed to Tribal Consultants.

**March 30, 2016:** Invitation sent via email to resource agencies for Resource Agency Meeting on the *Preliminary Alternatives Screening Report (PASR)* on April 20, 2016.

**April 5, 2016:** Tribal Historic Preservation Officer (THPO) of Miami Tribe of Oklahoma responded to *Phase Ia Archaeological Survey Report*.

**April 5, 2016:** A public meeting held concerning the I-69 Section 6 project.

**April 14, 2016:** DHPA-SHPO responded to the *Phase Ia Archaeological Survey Report*.

**April 20, 2016:** Resource Agency Coordination meeting held to provide update to I-69 Section 6 and how alternatives were eliminated to retain C1, C2, and C3.

**April 21, 2016:** Meeting held with INDOT, consultants, and DHPA-SHPO to discuss a potentially eligible resource within expanded APE and status of the Southside German Market Gardeners Historic District.

**May 2, 2016:** Section 106 tour held with DHPA-SHPO to review the relationship of the undertaking to historic resources and the potential effects of the undertaking upon them.

**May 11, 2016:** DHPA-SHPO responded to site visit and a separate tour.

**May 27, 2016:** DHPA-SHPO provided comments on the meeting summary for the May 2, 2016, site visit.

**June 15, 2016:** AI No. 2 transmitted to consulting parties via IN-SCOPE; a paper copy was transmitted to DHPA-SHPO.

**July 14, 2016:** DHPA-SHPO concurred with the recommendation of AI No. 2.

**August 2, 2016:** Consulting parties notified of availability of the Effects Report on INDOT's website IN-SCOPE and invited to attend a consulting party meeting on August 17, 2016, to discuss the report and updates to archaeology; DHPA-SHPO provided a paper copy of the Effects Reports.

**August 17, 2016:** Consulting party meeting held to discuss the Additional Information No. 2 Memorandum, the Effects Report and updates on archaeology.

**August 26, 2016:** DHPA-SHPO emailed questions about the undertaking's proximity to Marion County Bridge No. 4315 F.

**August 29, 2016:** The project team responded to SHPO's questions regarding Marion County Bridge No. 4315 F.

**September 1, 2016:** Meeting minutes (August 17) sent via email to consulting parties; paper copies distributed to those parties who did not provide an email address.

**September 1, 2016:** DHPA-SHPO responded to the Effects Report and consulting party meeting. DHPA-SHPO concurred with an adverse effect for the Rueben Aldrich Farm and the Southside German Market Gardeners Historic District and discussed mitigation for those properties.

**October 4, 2016:** Meeting held with property owners within the Southside German Market Gardeners Historic District to discuss impacts to the historic district and potential mitigation measures.

**October 28, 2016:** FHWA transmitted a letter to the DHPA-SHPO and consulting parties that summarized comments following the October 4, 2016, meeting and also transmitted information about noise levels for historic properties as a result of the undertaking.

**November 28, 2016:** DHPA-SHPO sent letter commenting on "the alternatives for the northeast quadrant of I-465 and Bluff Road, as they would affect the house at 4401 Bluff Road."

### **2.3 Consulting Parties**

In accordance with Section 106 requirements, the general public, local governments, recognized Native American Tribes with an interest in the area, and members of the community knowledgeable about its history were invited to consult on this project. All consulting parties from the Tier 1 EIS were invited to become consulting parties in the Section 6 Tier 2 Study. Representatives of organizations with an interest in historic properties as well as representatives of local governmental bodies were invited to become consulting parties. INDOT-CRP provided a list of Native American Tribes with an interest in the project area.

#### *Identification of Consulting Parties:*

In mid-May 2004, identification of consulting parties for Section 6 began. The Tier 1 list of consulting parties included individuals, representatives of government jurisdictions, Native American tribes, and representatives of various historical groups and other organizations with an interest in historic resources in the Tier 1 26-county study area. This list formed the basis for identifying those with an interest in consulting party status for the Tier 2 Section 6 study. In addition, consultants identified others located in the Section 6 study area who might have an interest in participating as consulting parties. On May 18, 2004, in compliance with Section 106, letters were sent to these potential consulting parties, Native American Tribes, and the DHPA-SHPO.

The Section 106 process requires coordination with recognized Native American tribes with an interest in the project area. The following tribes were invited to join in 2004: Delaware Nation, Peoria Tribe of Indians of Oklahoma, Miami Tribe of Oklahoma, Prairie Band of Potawatomi Nation, Shawnee Tribe of Oklahoma, Citizen Potawatomi Nation, Wyandotte Tribe of Oklahoma, Kickapoo Tribe of Oklahoma, Hannahville Indian Community Council, Pokagon Band of Potawatomi Indians, and Ottawa Tribe of Oklahoma. Thirteen tribes were identified and included in the invitations to become consulting parties in Section 6 in 2015. Invited tribes were: Delaware Nation, Delaware Nation of Oklahoma, Peoria Tribe of

Indians of Oklahoma, Prairie Band Potawatomi Nation, Shawnee Tribe, United Keetoowah Band of Cherokee Indians, Absentee Shawnee Tribe of Oklahoma, Eastern Shawnee Tribe of Oklahoma, Red Cliff Band of Lake Superior Chippewas, Grand Traverse Band of Ottawa and Chippewa Indians, Michigan, Chippewa Cree, and Saginaw Chippewa Tribe of Michigan. The tribes identified in the paragraphs below responded affirmatively to the invitation. (See Appendix M-4: Consulting Parties, for invitation and postcard responses.)

In addition to the SHPO, affirmative initial responses were received from Marion County Historian, Mayor of Southport, Morgan County Commissioner, Citizens for Appropriate Rural Roads (CARR), Traditional Arts Indiana, Historic Landmarks Foundation of Indiana (now Indiana Landmarks) Southwest Field Office, Owen County CARR/Owen County Preservations, Morgan County Historian, Historic Landmarks Foundation of Indiana (Indiana Landmarks) Central Office, Historic Landmarks Foundation of Indiana (Indiana Landmarks) Western Regional Office, Hoosier Environmental Council, Morgan County Historic Preservation Society, and Franklin Heritage. The following tribes accepted the invitation to join consultation: Shawnee Tribe, Delaware Nation, Peoria Tribe of Indians of Oklahoma, Miami Tribe of Oklahoma, Prairie Band Potawatomi Nation. (Note that the Prairie Band Potawatomi Nation provided updated contact information in July 2004 and Shawnee Tribe clarified their correct name in May 2005.) During this initial Section 106 process, Pauline Spiegel joined consultation.

Consultation for Section 106 was reinitiated in October 2015, following the issuance of the NOI. In consultant with INDOT-CRO, invitees included a group of former and newly identified consulting parties who would have a demonstrated interest in the project along or near the SR 37 corridor. In addition to the SHPO, the following individuals or agencies accepted the invitation to join consultation: Indiana Historic Spans Taskforce, Johnson County Historian, James L. Cooper Ph.D., Indiana Landmarks—Central Office, Morgan County Historic Preservation Society & Martinsville Plan Commission, Morgan County Historian, Morgan County Commissioners, City of Martinsville Engineer, Indiana Landmarks—Western Regional Office, Indianapolis Historic Preservation Commission, and Pauline Spiegel. (Note that consultants contacted Indiana Landmarks—Southwest Regional Office on November 19, 2015 explaining that the invitation to join consultation had been sent to an incorrect email address. Consultants invited the Southwest Regional Office to participate in Section 6 consultation. No response to this request was received.) (See Appendix M-4: Consulting Parties for invitation issued in 2015 and correspondence affirming or declining consulting party status.)

The following Native American Tribes accepted the invitation to join consultation: Peoria Tribe of Indians of Oklahoma, Chippewa Cree, United Keetoowah Band of Cherokee Indians in Oklahoma, and Miami Tribe of Oklahoma.

The following property owners of listed or eligible historic properties accepted invitations to join in consultation: Henry and Mary Sheid (Glennwood Homes Association, via post card), John W. Demaree (Summitt Realty Group, Lane Bluff, LLC via post card), Lonnie Smith (Reuben Aldrich Farm via post card), City of Indianapolis: Department of Public Works (Glenn's Valley Nature Park Retreat House via post card), Ann Bilodeau (Glennwood Homes Association via email and post card), Melvin J. Crichton (Glennwood Homes Association via post card), Beth Bylsma (Travis Hill via request at Public Meeting), N. Beth Line (Glennwood Homes Association via post card), Joseph Cleveland (Ozark Fisheries, Inc./Grassyforks Fisheries Farm No. 1 via post card), Debra Underwood (John Sutton House via request at Public Meeting), Charles and Elizabeth Laughner (Le Ciel [Charles Laughner House], via phone request). See Appendix M-4: Consulting Parties, for consultation and postcards relating to the invitation to join consultation.

## **2.4 Consulting Party Meetings**

### *First Consulting Party Meeting*

On June 16, 2004, FHWA invited consulting parties to the first consulting party meeting for Section 6. The meeting was held on July 2, 2004, at the Section 6 Project Office (Indianapolis, IN) to discuss the Section 106 process, review and obtain comments on the APE, and share information about the potential for historic properties within the APE. Representatives of FHWA, INDOT and its consultants, SHPO, and four other consulting parties attended the meeting. The team presented an overview of the Section 106 process and reviewed the four primary steps including initiating the process, identifying and evaluating historic properties, assessing the effects of the undertaking on historic properties, and resolving adverse effects to historic properties. The consultants presented information about the current efforts, including preparation of the historic context.

The consultants described the APE and some of the historic resources identified within the APE. Consulting parties were then asked to comment on the APE and the list of potentially eligible properties developed during the Tier 1 study. At the meeting, consulting parties asked questions about the process and identified cemeteries and folkways to examine during the survey. The first consulting party meeting concluded with statements from FHWA regarding next steps, which would include another consulting party meeting after resources had been identified. See Appendix M-4: Consulting Parties, for a copy of the invitation, agenda, presentation materials, and meeting minutes.

### *Second Consulting Party Meeting*

On August 15, 2005, FHWA invited consulting parties to the second consulting party meeting for Section 6. The meeting was held on August 31, 2005, at the Section 6 Project Office (Indianapolis, IN) to discuss findings of eligibility of historic properties identified in the study. Agents from FHWA, INDOT and its consultants, SHPO, and two other consulting parties attended the meeting. The project historian presented on the basic steps of the Section 106 process and the National Historic Preservation Act. The properties eligible for listing in the NRHP were further discussed.

A consulting party asked how the APE had been selected and consultants answered the APE was based on topography and view shed. A consulting party expressed concern for the ponds associated with the Grassyfork Fisheries. Archaeology was discussed; attendees were informed that background research had been conducted and fieldwork on undisturbed areas would be initiated in 2006. The second consulting party meeting concluded by giving attendees the location of where the Draft HPR would be located for review and comment and where to send comments. See Appendix M-4: Consulting Parties, for a copy of the invitation, agenda, presentation materials, and meeting minutes.

### *Third Consulting Party Meeting*

On November 19, 2015, FHWA invited consulting parties to the third consulting party meeting for Section 6. The meeting was held on December 7, 2015, at Southland Church to discuss the Section 106 process, properties eligible for inclusion in the NRHP, the extended APE, and survey methodology. Representatives of SHPO, FHWA, INDOT and its consultants, the acting THPO for the Miami Tribe of Oklahoma, and six other consulting parties attended the meeting. Resources that were recommended eligible for the NRHP as part of the AI study were presented including three districts and four individual resources: Southside German Market Growers Historic District, Glennwood Homes Association Historic District, Travis Hill Historic District, Le Ciel, Cleary-Barnett House, Glenn's Valley Nature Park Retreat House, and Reuben Aldrich Farm.

The archaeology consultants then discussed the updated archaeological records check mentioning twenty-one archaeological sites were potentially eligible under Criterion D located within the one mile buffer

surrounding the study area. Consultants then went over the idea of different alternatives and what would happen if a different alternative becomes the preferred. Undergoing analysis and efforts at the same level for any alternative was ensured. DHPA-SHPO and other consulting parties were asked to add any additional comments for discussion. No comments were offered. See Appendix M-4: Consulting Parties, for documents associated with this meeting including invitation, agenda, minutes, and consulting party comments.

#### *Fourth Consulting Party Meeting*

On August 2, 2016, FHWA invited consulting parties to the fourth consulting party meeting for Section 6. The meeting was held on August 17, 2016, at Southland Church. Representatives from FHWA, INDOT and its consultants, SHPO, and five other consulting parties attended the meeting. Eligible properties from the 2004-2008 study were presented and eligible properties from the 2015 and 2016 surveys followed along with a discussion of project activities in relation to those properties. The archaeology consultants provided an overview of the archaeological efforts for this project. Phase Ia survey was conducted in an area common to alternatives C1, C2, and C3. Eight sites were uncovered, determining one site to be potentially eligible. In addition, a sensitive area was noted and one section recommended for further work. See Appendix M-4: Consulting Parties, for documents associated with this meeting including invitation, agenda, minutes, and consulting party comments.

### **3.0 DESCRIPTION OF HISTORIC PROPERTIES**

#### **3.1 Morgan County Bridge 224 (NBI No.: 5500142; Select)**

Morgan County Bridge No. 224 is a three-span, Warren pony truss with concrete deck, abutments, wingwalls, and piers that was completed in 1925. Each span has seven panels. The length of the riveted structure is approximately 236 feet. Morgan County Bridge No. 224 was determined eligible as a Select Bridge in the *Indiana Statewide Historic Bridge Inventory* under Criterion C. The period of significance is 1925, the year of construction identified in the Inventory.

#### **3.2 Top Notch Farm**

Top Notch Farm is located around the base of Pollard Hill near SR 37 at Mahalasville Road in Martinsville. The property includes a simple one- and one-half story, frame farmhouse and several outbuildings relating to dairy farming. The house and garage were built in 1932. Most of the outbuildings date to the 1930s. The farm no longer functions as a dairy operation, but continues to be the center of a 576-acre crop farm. Top Notch Farm retains integrity and is eligible for inclusion in the NRHP under Criterion A. The period of significance is 1932 to circa 1950.

#### **3.3 East Washington Street Historic District**

The East Washington Street Historic District is a residential extension of a main commercial street in the town of Martinsville. Much of the area was developed between about 1880 and 1930. The most prevalent architectural styles are Queen Anne and Colonial Revival. Also represented are the Second Empire, Craftsman, Free Classic, Bungalow, Italianate, Stick, Shingle, and Prairie styles. Vernacular types include gable-front, gabled-ell, and double-pen houses. Mature shade trees extend on both sides of Washington Street and are important in defining the district's character. Other contributing elements are sandstone curbs, iron fences, and brick and stone retaining walls. The East Washington Street Historic District was

listed in the NRHP in 1997 and is significant under Criteria A and C. The period of significance is 1869 to circa 1940.

### **3.4 W.E. Nutter House**

The W. E. Nutter House appears to be unaltered, is in excellent condition, and is distinctive for its degree of architectural detail. The two-story, three-bay house is basically an American Foursquare in massing, with a sun porch extending on the west side of the house and a porte cochere on the east side. Noteworthy architectural details include leaded glass windows and doors, stone accents, modillions under the eaves, and a pantile roof. There is a small, unattached garage to the rear of the property that matches the style and materials of the house. The W. E. Nutter House retains integrity and is eligible for listing in the NRHP under Criterion C. The period of significance is circa 1915.

### **3.5 Percy Farm and Clear Creek Fisheries**

The Percy Farm and Clear Creek Fisheries complex is situated on the east side of Hess Road, approximately 0.33 miles south of SR 44. The property consists of a Central Passage House (circa 1870) and five agricultural buildings dating to the historic period including a smokehouse, tool shed/corn crib, small barn, and two utility sheds (all circa 1920); the large fishery (1934) includes a barn and complex of ponds east of the main outbuildings. Intact transportation networks show the relationship between the house, the small collection of agricultural outbuildings, and the fisheries. The fishery includes eighty-eight actively farmed ponds containing eight varieties of commercial game fish. A modern pole barn southwest of the earlier fishery barn dates to circa 2010. This property is eligible for listing in the NRHP under Criteria A and C (house only) for significance in the areas of Agriculture and Architecture. The period of significance is circa 1870 to 1972.

### **3.6 Grassyfork Fisheries Farm No. 1**

The Grassyfork Fisheries Farm No. 1 consists of a main building, several accessory buildings and structures, and dozens of goldfish breeding and hatching ponds. The Office and Display Room, built in 1936, is located near Old 37 (also known as Morgan Road) within the APE for this project and is a two-story commercial structure with Prairie-style massing and details. The Office and Display Room was constructed along Old SR 37 as a sales and service building. It was expected to “draw hundreds of visitors each week” according to a newspaper article quoted in the NRHP nomination form. Grassyfork Fisheries Farm No. 1 was listed in the NRHP in 2012. It is significant under Criteria A, B, and C with a period of significance from 1936 to 1960.

### **3.7 Reuben Aldrich Farm**

The Reuben Aldrich Farm (also known as Big Bend Farm) consists of three buildings: an Italianate-style house, a barn, and a garage. The house dates from 1869; the barn is antebellum, with post-Civil War improvements and additions; and the garage appears to date from circa 1915. The house is prominently sited on a rise and bend of Old SR 37. It is constructed of red brick laid in common bond with limestone details, such as round-arched windows with corbels, keystones, and spring stones. The barn, located southwest of the house, was built as a bank barn and was enlarged around 1869 at the time that the house was built. There may be an unmarked cemetery a short distance west of the house and north of the barn. The Reuben Aldrich Farm is eligible for listing in the NRHP under Criteria A and C, for Agriculture and Architecture. The period of significance is circa 1869 to 1915.

### **3.8 Morgan County Bridge No. 166 (NBI No.: 5500153; Select)**

Morgan County Bridge No. 166 is a two-span, reinforced concrete slab. The deck is thirty-seven feet long and thirty-six feet wide, with two lanes. The bridge was determined eligible for listing in the NRHP as a Select bridge per the *Indiana Statewide Historic Bridge Inventory*. Bridge No. 166 is eligible under Criteria C, and the period of significance is 1925, the date of construction.

### **3.9 Travis Hill Historic District**

Travis Hill Historic District (developed in 1962) was the first residential development in this area to take advantage of a vista provided by the hilltop location and the proximity of SR 37. The neighborhood district consists of five houses on five lots radiating from the Travis Place cul-de-sac atop Travis Hill. Each lot is about an acre in size. The houses are located close to the street, Travis Place, providing large backyards that follow the slope of Travis Hill with sweeping vistas. Travis Hill Historic District is eligible for listing in the NRHP under Criteria A and C. The period of significance begins in 1962, the date that the first house was constructed, and ends in 1968, the date that the last house was constructed.

### **3.10 John Sutton House**

The John Sutton House, constructed in 1875, is a two-story, brick, Italianate-style dwelling once part of a large Johnson County farm. It exhibits most of the hallmarks of the Italianate style, such as a low-pitched, hipped roof, bracketed cornice, and round arched windows. Noteworthy details include the spiral molding around window frames, keystones in arched openings, and detailed scrollwork on brackets. The house has a high degree of integrity, with original windows, doors, and porches all intact. The property is eligible under Criterion C for Architecture, and the period of significance is 1875, the year of construction.

### **3.11 Marion County Bridge No. 4513 F (NBI No.: 4900484; Non-Select)**

Marion County No. 4513 F is a reinforced concrete bridge constructed in 1954. The bridge, which has an open concrete balustrade, was determined NRHP eligible as a Non-Select Bridge in the *Indiana Statewide Historic Bridge Inventory*. The bridge is eligible under Criterion C, for Engineering, because it features variable depth construction, which “is an important innovation in bridge construction to achieve greater span distances than can be achieved with a traditional form.” The period of significance is 1954, the date of construction.

### **3.12 Cleary-Barnett House**

The Cleary-Barnett House is located at the southwest corner of Stop 11 Road where it intersects with the diagonal Bluff Road. This classic Ranch house is sited at the apex of a small hill and built into the slope to take advantage of the uneven terrain. Built in the 1950s, the Cleary-Barnett House is a one-story house faced with random-coursed limestone ashlar resting on a full basement. A broad low chimney, also faced with limestone, punctuates the roof. Both the garage and the house are built into the slope of the lot with only the southwest corner of the basement exposed. The Cleary-Barnett House retains high integrity and is eligible for listing in the NRHP under Criterion C for Architecture. The period of significance is circa 1955, the date of construction.

### **3.13 Glenn’s Valley Nature Park Retreat House**

The Glenn's Valley Nature Park Retreat House is located in the center of Glenn's Valley Nature Park north and east of the village of Glenn's Valley. It is a two-story Colonial Revival-style house dating to 1935. The house and twenty-seven acres of meadows and woods became part of the Indianapolis park system in 1992. The Retreat House is sited on high ground in a clearing surrounded by woodland. It has a side gable roof and is clad in bricks painted white. The house features such typical Colonial Revival details as a symmetrical façade, a two-story, Mount Vernon-style porch, an exterior end chimney, and sidelights bordering a central entrance. Most windows and doors are original. Glenn's Valley Nature Park Retreat House is eligible for the NRHP under Criterion C for Architecture. The period of significance is 1935, the date of construction.

### **3.14 Glennwood Homes Association Historic District**

The Glennwood Homes Association neighborhood is an excellent example of a post-war residential neighborhood as expressed in the outstanding examples of Modern and Ranch houses in Marion County, Indiana. Houses are of two styles of the era: Ranch and Modern. Glennwood Homes Association neighborhood consists of twenty-six irregularly shaped lots conforming to the rugged terrain of the 46.5 acres. The lots are accessed by two curvilinear private roads that terminate into three cul-de-sacs. Three lots are designated as "Commons" providing for community use as gardens, recreation, and wildlife habitat. The neighborhood consists of twenty-three houses, twenty of which were constructed in the 1950s and 1960s. Three houses were constructed in the 1990s. Stylistically, 87 percent of the twenty-three houses, as they were originally built, reflect the era of development of Glennwood Homes Association. They were designed and built in the popular Ranch style and the less common Modern style. These houses are sited to maximize the terrain of the lots providing vistas and privacy for their inhabitants. The Glennwood Homes Association Historic District is eligible under Criteria A and C. The period of significance is 1949, the date that the community was platted, and ends in the 1960s when it reached its present size.

### **3.15 Le Ciel (Charles Laughner House)**

Le Ciel, the Charles Laughner House, a circa 1967 New Traditional French house, occupies the crown of a hill and is approached by a long, steep, serpentine, wooded driveway from Belmont Avenue. The house has three levels distinguished by three different materials, color, and textures: the brick first floor, the half-timbered second floor, and the massive steeply pitched hipped roof that is clad with asphalt shingles resembling slate. The core of the house is rectangular in plan crowned by the hipped roof. Two, one-story wings project north and south from the rectangular core of the house. Other noteworthy features and details include the exclusive use of casement windows; wrought-iron bombe-shaped dormer balcony railings; a series of massive wooden corbels supporting the cantilevered second-story; a paved courtyard on the back (west) side of the house; and first-floor oriels on the north wall and north wing. Two, small free-standing companion outbuildings are also topped by steep hipped roofs with dormers and faux half-timber wall cladding. Le Ciel is eligible for the NRHP under Criterion C. The date of significance is circa 1967, the date of construction.

### **3.16 Southside German Market Gardeners Historic District**

Southside German Market Gardeners Historic District is comprised of the small field/garden patterns, greenhouses, barns, sheds, and houses along Bluff Road that when combined, or taken as a whole, creates a definite "feeling" and "association" of a way of life. Market gardeners, as they were called in the twentieth century, lived and worked in a distinct community on the south side of Indianapolis; a portion of this community is located along Bluff Road within a section of the expanded APE (2015). A market garden property might include a house or houses, barns, greenhouses, and fields/gardens. The Southside

German Market Gardeners Historic District is eligible for the NRHP under Criteria A and C. The period of significance is circa 1900 to 1972.

### **3.17 Archaeology Site 12-Mg-0556**

Site 12-Mg-0556 is a late nineteenth to twentieth century historical school house. A brick foundation of the school and two wood frame structures were encountered immediately adjacent to the northern end of the area survey in 2015–2016. The site was photographed but not evaluated for eligibility. The DHPA-SHPO has stated that “insufficient information” is available for this site to determine if it is eligible for inclusion in the NRHP. Avoidance or additional investigation is recommended to determine if the site is NRHP eligible.

### **3.18 Alluvial Floodplain Test Area**

An alluvial floodplain area lies south of Martinsville in the White River valley and has the potential to contain buried archaeological sites. Phase Ic studies were recommended for this area. The DHPA-SHPO has concurred that if these areas cannot be avoided by all project activities, the affected area will be subject to additional investigation to determine NRHP eligibility. In that case, a plan for additional investigation will be submitted to the DHPA-SHPO for review and comment.

## **4.0 DESCRIBE THE UNDERTAKING’S EFFECTS ON HISTORIC PROPERTIES**

### **4.1 Morgan County Bridge 224 (NBI No.: 5500142; Select)**

Morgan County Bridge No. 224 is currently closed to traffic. Project improvements under the preferred alternative are located nearly 600 feet from the location of Bridge No. 224 and will take place along the existing SR 37. Under the preferred alternative, Old SR 37 will be permanently closed to the new I-69 and the connecting pavement removed. Noise will not affect the integrity of this property since bridges are by their very nature intended to be in environments of traffic noise. The bridge will have a view to the undertaking.

The undertaking will have an effect on Morgan County Bridge No. 224, but that effect will not be adverse.

### **4.2 Top Notch Farm**

The preferred alternative located approximately 700 feet from Top Notch Farm, would include an interchange at SR 37 and Ohio Street/Mahalasville Road approximately 1,000 feet from the property. Ohio Street would be raised approximately twenty-five feet as it crosses I-69. Mahalasville Road would also be reconfigured north of its current location, and Southview Drive would be relocated adjacent to the historic property boundary. The existing intersection of Southview Drive and Commercial Boulevard at Ohio Street would be closed. The ambient noise reading for the farm is 49.6 A-weighted decibels (dBA); in the design year 2045, noise modelers project an increase of 8.3 dBA to reach a 57.9 dBA with the construction of I-69. Neither the increase nor the projected design year noise level are considered an adverse effect, per INDOT’s noise policy.

The effects of the undertaking will not alter the characteristics of the Top Notch Farm that are cause for its eligibility in the NRHP. The property is already in a disturbed setting with modern non-agricultural

buildings in proximity. It is the significance of the farm property itself rather than the setting that renders this resource eligible. The integrity of the farm will not be adversely impacted as a result of this project.

### **4.3 East Washington Street Historic District**

The preferred alternative is located more than 4,000 feet from the boundary of the East Washington Street Historic District. The district is located in a dense, urban area of Martinsville and thus would not have a view to the undertaking. Noise and traffic increases would not occur as a result of the undertaking.

The undertaking would have no effect of the East Washington Street Historic District.

### **4.4 W.E. Nutter House**

The preferred alternative is located approximately 3,500 feet from the W.E. Nutter House. The Nutter House is located in a dense, urban area of Martinsville and thus, would not have a view to the undertaking. Noise and traffic increases would not occur as a result of the undertaking under any of the alternatives.

The undertaking would have no effect on the W.E. Nutter House.

### **4.5 Percy Farm and Clear Creek Fisheries**

The mainline of the preferred alternative is located over 3,000 feet from the Percy Farm and Clear Creek Fisheries. No improvements are planned along Hess Road as part of the construction, although traffic is projected to decrease over the “No Build” alternative as a result of this undertaking.

The undertaking will not affect the Percy Farm and Clear Creek Fisheries.

### **4.6 Grassyfork Fisheries Farm No. 1**

The preferred alternative will take place nearly 1,300 feet from the boundary of Grassyfork Fisheries Farm No. 1 along SR 37. The I-69 mainline will maintain the general elevation of existing SR 37 which is depressed in the area; SR 37 is not currently visible from the property, and the undertaking would not be elevated as part of the improvements to the mainline.

Morgan Street will be reconstructed to join Old SR 37 north of the Country Club Road and Teeters Road will include an overpass. Traffic will increase in front of Grassyfork Fisheries Farm No. 1. There will be a change in view produced by increasing traffic along Teeters Road. The ambient noise level at Grassyfork Fisheries Farm No. 1 is 48.2 dBA; that level will increase to 55.7 dBA, a change of 7.5 dBA, which is not considered adverse per INDOT’s noise policy.

Grassyfork Fisheries Farm No. 1 is not sensitive to noise and would not be affected by traffic changes that would result from the construction of this undertaking. These changes will not constitute an adverse effect.

### **4.7 Reuben Aldrich Farm**

The I-69 Section 6 mainline would be located approximately 1,300 feet from the boundary of the farm, and the nearest project component would be the addition of an overpass connecting Big Bend Road and Tunnel Road. The overpass would tie into Big Bend Road approximately 650 feet from the historic property boundary. The overpass would be a local service road and would likely not be visible from the

historic property boundary. Traffic is anticipated to increase as a result of the undertaking, particularly truck traffic. Old SR 37 was designed as a state road and can accommodate the traffic. However, the road would no longer be a low volume road and there are no plans to improve the road. Traffic levels are forecasted to increase from a base model year (2010) daily traffic count of 170 vehicles per day (VPD) to 1,410 VPD in the year 2045. Daily truck traffic would increase from 20 to 30 vehicles. The ambient noise level for the Reuben Aldrich Farm is 50.1 dBA, a level that is expected to increase to 52.6 dBA, an increase that will not be perceptible to the human ear. Therefore, there is not an adverse noise impact, per INDOT's noise policy.

The setting will be impacted: with the construction of an overpass over I-69, traffic will be redirected, resulting in an increase in traffic in front of the Reuben Aldrich Farm. The setting of this property is an aspect of its integrity that allows it to convey its significance. Therefore, the undertaking will have an adverse effect.

#### **4.8 Morgan County Bridge 166 (NBI No.: 5500153; Select)**

Mainline construction for the preferred alternative will take place approximately 3,500 feet from this property. An interchange improvement will occur along SR 144/CR 144, approximately 4,500 from the bridge. No traffic increases along the Old SR 37, the roadway Morgan Co. Br. 166 carries, are anticipated. Noise will not affect the integrity of this property since bridges are by their very nature intended to be in environments of traffic noise

The undertaking will have no effect on Morgan County Bridge No. 166.

#### **4.9 Travis Hill Historic District**

A local access overpass is planned for Stones Crossing Road over proposed I-69 for the preferred alternative. These improvements will terminate adjacent to the historic property boundary. Travis Hill is located along a rise above the intersection of SR 37 and Stones Crossing Road. Trees would be cleared adjacent to the neighborhood and Stones Crossing would be re-aligned, altering the setting of the district. The Travis Hill Historic District would be affected by traffic changes and visual impacts that result from the construction of an overpass built as part of the undertaking and the clearing of about twenty trees lying outside the historic boundary. However, houses within the district are on heavily wooded lots and would not have a view to the undertaking during much of the year. Noise will increase from 53.9 dBA to 60.6 dBA at one of the receivers in the district. (The other receiver would experience a decrease in dBA.) The projected noise levels at these receivers do not rise to the level of an adverse effect, per INDOT's noise policy.

Therefore, these changes will not constitute an adverse effect on the Travis Hill Historic District.

#### **4.10 John Sutton House**

The undertaking will take place approximately 500 feet from the house under the preferred alternative. In addition, an interchange at County Line Road, situated nearly 1,700 feet from the John Sutton House, is proposed under the Preferred Alternative C4. The undertaking will result in a change of setting from the construction of the interchange. The ambient noise reading for the John Sutton House is 57.4 dBA; in the design year 2045, noise modelers project a noise reading of 64.0 dBA or an increase of 6.6 dBA, which is below INDOT criteria for an adverse effect. However, setting is not key to the integrity and significance of this property; SR 37 and modern intrusions are already extant and these have not diminished its integrity.

The undertaking would not adversely affect the John Sutton House.

#### **4.11 Marion County Bridge 4513 (NBI No.: 4900484; Non-Select)**

The undertaking would take place within approximately 126 feet from the center of the bridge under Preferred Alternative C4. No traffic impacts are anticipated as part of this undertaking. The setting does not contribute to the engineering significance. Noise and traffic would not affect the integrity of this property since bridges are by their very nature intended to be in environments of traffic noise.

The undertaking would have an effect on Marion County Bridge 4315 F due to the increased travel time to access the bridge, but that change will constitute a No Adverse Effect because it does not inhibit the ability of the resource to convey its engineering significance.

#### **4.12 Cleary-Barnett House**

The undertaking is located approximately 1,900 feet from the property under Preferred Alternative C4. Noise will increase from 49.9 dBA in the current year to 55.2 dBA in design year 2045; this is not considered an adverse impact per INDOT's noise policy. The Cleary-Barnett House is set on a heavily wooded lot with limited visibility to the undertaking.

The topography and vegetation of the setting is not expected to change given the wooded setting of the property and the distance to the undertaking; therefore, the effect will not be adverse.

#### **4.13 Glenn's Valley Nature Park Retreat House**

The undertaking is located approximately 1,670 feet from the property under Preferred Alternative C4. Noise will increase from 47.5 dBA in the current year to 54.5 dBA in design year 2045; this is not considered an adverse impact per INDOT's noise policy. The Retreat House is set on a heavily wooded lot with limited visibility to the undertaking. Therefore, no change to the setting is anticipated.

The undertaking will have no adverse effect on the Glenn's Valley Nature Park Retreat House.

#### **4.14 Glennwood Homes Association Historic District**

The undertaking is located 578 feet from the property under Preferred Alternative C4. The district is set on a heavily wooded tract of land along Bluff Road. The neighborhood is accessed via Bluff Road and traffic is expected to decrease as a result of the undertaking at Bluff Road north of Stop 11 Road, which is the entrance/access to the majority of resources within the district. The undertaking will be visible from the highest point of the neighborhood during times of the year without leaf cover. Vegetation will partially screen the undertaking from the district while the distance will further reduce its effects. Ambient noise levels have been measured at 54.3 dBA; these levels are predicted to increase to 63.0 dBA at the receiver closest to the undertaking in the design year 2045, which is not considered adverse per INDOT's noise policy.

Therefore, the undertaking will have No Adverse Effect on the Glenwood Homes Association.

#### **4.15 Le Ciel (Charles Laughner House)**

The mainline of Preferred Alternative C4 is located approximately 70 feet from the historic boundary of the home. In addition, Belmont Avenue, which passes in front of the property, will be closed to traffic and will be turned to a cul-de-sac. Le Ciel is set on a heavily wooded tract of land on a high elevation but the

home is visible during the winter months; thus, during part of the year the home will have a view of the undertaking and perhaps to the Southport Road interchange. Ambient noise levels have been measured at 56.9 dBA; these levels are predicted to increase to 65.9 dBA in the design year 2045; which is not considered an adverse effect per INDOT's noise policy.

The property is presently located along Belmont Road and parallel to SR 37, but it is screened from these roadways much of the year. Although access to Belmont Road and SR 37 will change, the proximity of the house to the roadways will not be affected. Therefore, Le Ciel will be affected by the undertaking, but not adversely.

#### **4.16 Southside German Market Gardeners Historic District**

The district is located along the undertaking on both the north and the south side. The project would replace and widen the I-465 bridge over Bluff Road, which is located within the district. Mechanically stabilized earth (MSE) retaining walls would be used along the south side of I-465. A vegetated side-slope would be constructed along the north side I-465, west of Bluff Road. A combination of a vegetated side-slope and MSE walls would be constructed along north side of I-465, east of Bluff Road to avoid impacting electric transmission towers. The Contributing house located at 4401 Bluff Road would be removed as part of the side-slope construction. The project would acquire a total of approximately 6.0 acres from the historic district in the four quadrants. Traffic along Bluff Road would decrease from 11,500 VPD in 2010 to 9,890 VPD in the year 2045. Daily truck traffic along Bluff Road would decrease from 240 to 105. The ambient noise level is 69.7 dBA; in the design year 2045, the noise level would increase to 70.1 dBA, a difference of 0.4. Noise at the Southside German Market Gardeners Historic District will not increase such that it will constitute an adverse impact, per INDOT's noise policy.

Therefore, the Southside German Market Gardeners Historic District will experience an adverse effect from this undertaking.

#### **4.17 Archaeology Site 12-Mg-0556**

Site 12-Mg-0556 has insufficient information to determine if it is eligible for inclusion in the NRHP and is located within Preferred Alternative C4 right of way. If the site cannot be avoided, it will be subject to additional investigation to determine if it is eligible for the NRHP. The additional investigation may be completed prior to the publication of the FEIS. If it is not completed before the FEIS is published, the FEIS will include a MOA or PA developed in consultation with the DHPA-SHPO.

#### **4.18 Alluvial Floodplain Test Areas**

An alluvial floodplain south of Martinsville in the White River valley and has the potential to contain buried archaeological sites and is located within Preferred Alternative C4 right of way. Phase Ic studies were recommended for this area. The additional investigation may be completed prior to the publication of the FEIS. If it is not completed before the FEIS is published, the FEIS will include a MOA or PA developed in consultation with the DHPA-SHPO.

### **5.0 EXPLAIN APPLICATION OF CRITERIA OF ADVERSE EFFECT – INCLUDE CONDITIONS OF FUTURE ACTIONS TO AVOID, MINIMIZE, OR MITIGATE ADVERSE EFFECTS**

36 CFR § 800.5(a)(1) states: "An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting,

materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.”

With regard to consideration of noise effects discussed below, and also discussed briefly in Part 4.0 above, the updated INDOT Traffic Noise Analysis Procedure (approved by the FHWA and effective July 2011) was utilized. Title 23 of the Code of Federal Regulations Part 772 (Procedures for Abatement of Highway Traffic Noise and Construction Noise) requires a highway noise study to determine the potential impacts to noise-sensitive land uses for Type I projects. The INDOT Traffic Noise Analysis Procedure has adopted the seven activity categories and respective Noise Abatement Criteria (NAC) defined by the FHWA in 23 CFR 772. The NAC for Category B (residential) is the most commonly used. The NAC for this category has an hourly sound level  $Leq(h)$  of 67 dBA and typically applies to exterior areas of frequent human use residential areas. For the purpose of this preliminary noise study, the historic properties were included in this classification. Additionally, a noise analysis was not conducted for areas such as the bridges because noise is not a component to their setting and noise is also a consequence of their functions.

The INDOT Traffic Noise Analysis Procedure states that highway noise impacts occur if either of two conditions is met: 1) the predicted  $Leq(h)$  levels “approach” or “exceed” the appropriate noise abatement criteria for the land use identified, or 2) the predicted highway  $Leq(h)$  noise levels substantially exceed the existing noise level. “Approach or exceed” is defined as levels that are within 1 dBA  $Leq(h)$  of the appropriate NAC or higher. The NAC for Category B land use is 67 dBA. Accordingly, 66 dBA is the level at which highway noise impacts occur. “Substantially exceed” means predicted traffic noise levels exceed existing noise levels by 15 dBA or more. Note that if the existing ambient noise level currently approaches or exceeds the criteria, then predicted increases are not considered effects unless there is an increase of 15 dBA.

Existing and design year 2045, sound levels were determined using sound level meters and/or FHWA TNM 2.5 modeling, as applicable. According to the INDOT Traffic Noise Analysis Procedure, all receptors must be identified within 500 feet from each reasonable alternative (edge of the outside travel lane) considered in the NEPA evaluation. If during the identification of impacted receptors, it is shown that receptors are being impacted at 500 feet, the corridor of study will be extended to 800 feet from each reasonable alternative. According to INDOT policy, noise receptor locations located more 800 feet from the project roadway are not evaluated for highway traffic noise effects.

FHWA has not validated the TNM model for accurate results beyond 800 feet, per FHWA’s “Addendum to Validation of FHWA’s Traffic Noise Model® TNM: Phase 1.” For purposes of this preliminary analysis, a conservative approach of capturing potential noise impacts for those properties within an 800-foot distance from the mainline was used. At other times, noise modeling was conducted for resources along local access roads where traffic could increase and therefore, had the potential to affect historic properties.

For the purpose of this study, noise effects on historic properties attributable to the undertaking were assessed in the following manner: A TNM-predicted noise impact, as defined in the INDOT Traffic Noise Analysis Procedure, was considered an adverse effect. Noise effects were not considered adverse if the undertaking would result in a change in noise levels (i.e., if an audible increase in noise levels was predicted, or, if traffic noise would be introduced or added to the historic property), but a noise impact per the noise policy was not predicted. Additionally, if the existing ambient noise level currently meets the criteria, then predicted increases are not considered an adverse effect unless there is an increase of 15

dba. Noise effects were also considered not to be present if it was determined that the undertaking would cause no change in noise levels or would not introduce or add to traffic noise.

This preliminary noise analysis was performed based on the best available traffic and design data to satisfy the needs of the effects report. The preferred alternative with detailed design and updated traffic volumes is identified in the EIS, and the sound level effects of that alternative are fully evaluated in the noise technical document. Nonetheless, based on the preliminary analysis, it is not expected that there will be a highway traffic noise “impact” as defined by FHWA for the various historic properties’ NAC. Many of the properties are generally too far away from the alternatives. The remaining properties’ sound level results are either below the criteria or approached or exceeded the NAC in the existing condition. Note, sound levels are added logarithmically and not linearly. As a result, it would take a subsequent “doubling” of present traffic volumes to increase the predicted noise levels by 3 decibels, which is the smallest change perceptible to the human ear.

The criteria of adverse effect do not apply to: Morgan County Bridge 224, Top Notch Farm, East Washington Street Historic District, W.E. Nutter House, Percy Farm and Clear Creek Fisheries, Grassyfork Fisheries Farm No. 1, Morgan County Bridge 166, Travis Hill Historic District, John Sutton House, Marion County Bridge 4513 F, Cleary-Barnett House, Glenn’s Valley Nature Park Retreat House, Glennwood Homes Association Historic District, and Le Ciel (Charles Laughner House).

The criteria of adverse effect do apply to the Reuben Aldrich Farm and Southside German Market Gardeners Historic District.

At this time, only a portion of the archaeological investigations have been conducted within the Section 6 archaeological APE; therefore, it is presupposed that the project will have an adverse effect on archaeological resources.

The Phase Ia studies revealed the presence of nine archaeological sites within portions of the Section 6 APE in Preferred Alternative C4. Of these, one site (12-Mg-0556) has insufficient data for an eligibility determination and additional investigation is recommended for Site 12-Mg-0556 if it cannot be avoided by the project. Site 12-Mg-0052 within the APE was found unlikely to contain intact deposits, and no further investigation was necessary within the APE. However, the site boundaries will be marked and identified as a sensitive resource. The remaining seven identified archaeological sites have been recommended as not eligible for listing in the NRHP. One area south of Martinsville in the White River valley was identified with a high potential for buried cultural deposits and Phase Ic subsurface investigation was recommended.

The criteria of adverse effect may apply to site 12-Mg-0556 and an Alluvial Area south of Martinsville which are within, or in proximity to, Preferred Alternative C4. At this time not all Phase Ia archaeological investigations have been conducted within Preferred Alternative C4. Therefore, it is presupposed that the project will have an adverse effect on archaeological resources.

The remaining Phase Ia archaeological investigations for the APE occurred in November 2016. Once those investigations are concluded, the Phase Ia archaeological report for that portion of the project will be submitted to DHPA-SHPO and the effect of the project on archaeological resources will be reassessed.

## **5.1 Morgan County Bridge 224 (NBI No.: 5500142; Select Bridge)**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Morgan County Bridge 224. The Bridge will not be affected adversely by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” Existing pavement of Old SR 37 to the new I-69 will be removed but the pavement will still connect to local roadways. This does not constitute an adverse effect.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” as the Bridge will have a distant view to the improved interstate but that view will not adversely affect the defining characteristics of the property. Noise will not affect the integrity of this property since bridges are by their very nature intended to be in environments of traffic noise.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.2 Top Notch Farm**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Top Notch Farm. The property will not be affected adversely by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.” The preferred alternative located approximately 700 feet from Top Notch Farm, would include an interchange at SR 37 and Ohio Street/Mahalasville Road approximately 1,000 feet from the property. Southview Drive would be relocated adjacent to the historic property boundary.

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” Improvements to Ohio Street/Mahalasville Road will take place adjacent to, but not within, the property’s boundary. Southview Road will be realigned adjacent to the historic property boundary.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements.” The following changes will occur. Ohio Street will be raised twenty-five feet where it crosses I-69. Top Notch Farm will have a view to this new construction. However, since the property is already in a

disturbed location with modern construction; therefore, this visual effect will not be considered adverse. The ambient noise reading for the farm is 49.6 dBA; in the design year 2045, noise modelers project an increase of 8.3 dBA to reach a 57.9 dBA with the construction of I-69. Neither the increase nor the projected design year noise level are considered an adverse effect, per INDOT's noise policy.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no "transfer, lease, or sale of the property out of Federal ownership or control."

### **5.3 East Washington Street Historic District**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the East Washington Street Historic District. The district will not be affected by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause "physical destruction of or damage to all or part of the property." The undertaking is more than 4,000 feet from the historic property boundary.

Per 36 CFR 800.5(a)(2)(ii), there will be no "restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines."

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change "of the character of the property's use or of physical features within the property's setting." The preferred alternative is located more than 4,000 feet from the district boundary.

Per 36 CFR 800.5(a)(2)(v), there will be not be an "introduction of visual, atmospheric or audible elements" since the undertaking is located at a distance of more than 4,000 feet from the East Washington Street Historic District and since no traffic increases will take place.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no "transfer, lease, or sale of the property out of Federal ownership or control."

### **5.4 W.E. Nutter House**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the W.E. Nutter House. The property will not be affected by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause "physical destruction of or damage to all or part of the property."

Per 36 CFR 800.5(a)(2)(ii), there will be no "restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the

Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines."

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change "of the character of the property's use or of physical features within the property's setting." The preferred alternative is located more than 3,500 feet from the property.

Per 36 CFR 800.5(a)(2)(v), there will be not be an "introduction of visual, atmospheric or audible elements" since the undertaking is located at a distance of approximately 3,500 feet from the W.E. Nutter House and since no traffic increases will take place.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no "transfer, lease, or sale of the property out of Federal ownership or control."

## **5.5 Percy Farm and Clear Creek Fisheries**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Percy Farm and Clear Creek Fisheries. The property will not be affected by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause "physical destruction of or damage to all or part of the property."

Per 36 CFR 800.5(a)(2)(ii), there will be no "restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines."

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change "of the character of the property's use or of physical features within the property's setting." The preferred alternative is located more than 3,000 feet from the property.

Per 36 CFR 800.5(a)(2)(v), there will be not be an "introduction of visual, atmospheric or audible elements" since the undertaking is located at a distance of more than 3,000 feet from the Percy Farm and Clear Creek Fisheries. Traffic is also expected to decrease under the preferred alternative in comparison to projected traffic numbers in the "No Build" alternative. Since there was expected to be a change in traffic due to the undertaking, noise modeling was conducted. The ambient noise reading at Percy Farm and Clear Creek Fisheries is 41.6 dBA; the projected noise reading in the design year of 2045 is 44.9 for an increase of 3.3 dBA, a level that is not considered adverse, per INDOT's noise policy.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no "transfer, lease, or sale of the property out of Federal ownership or control."

## **5.6 Grassyfork Fisheries Farm No. 1**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Grassyfork Fisheries Farm No. 1. The property will be affected by the undertaking, but the effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is located nearly 1,300 feet from the property’s boundary, and improvements to Morgan Street will take place outside of the historic property boundary.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” since traffic along Morgan Street would increase as a result of the undertaking. The ambient noise level at Grassyfork Fisheries Farm No. 1 is 48.2 dBA; that level will increase to 55.7 dBA, a change of 7.5 dBA, which is not considered adverse per INDOT’s noise policy. In addition, the property is not sensitive to noise and traffic since the Office and Display Room were originally constructed at the location near Morgan Street (Old SR 37) to attract customers.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.7 Reuben Aldrich Farm**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), apply to the Reuben Aldrich Farm. The property will be adversely affected by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.” The overpass will tie into Big Bend Road approximately 650 feet from the historic property boundary.

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is located approximately 1,300 feet from the property and a local overpass will tie into the Big Bend Road more than 650 feet from the property.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements.” As noted previously, Big Bend Road will pass over I-69 and direct traffic onto Old SR 37; as a result of the possible change in traffic in this area, noise modeling was conducted. The ambient noise level for the Reuben Aldrich Farm is 50.1 dBA, a level that is expected to increase to 52.5 dBA, an increase that will not be perceptible to the human ear. Therefore, there is not an adverse noise impact, per INDOT’s noise policy. However, traffic is anticipated to increase and Old SR 37 will no longer be a low volume road as it is classified today. Setting is an aspect of integrity for this historic farm and thus the introduction of increased traffic will be an adverse effect.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.8 Morgan County Bridge 166 (NBI No.: 5500153; Select)**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to Morgan County Bridge 166. The bridge will not be affected by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.” The property is located approximately 3,500 feet from the undertaking.

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is located more than 3,500 feet from the bridge.

Per 36 CFR 800.5(a)(2)(v), there will be not be an “introduction of visual, atmospheric or audible elements” since the undertaking is located at a distance of approximately 3,500 feet from the bridge. At this distance view of the interstate will not affect this resource. Noise will not affect the integrity of this property since bridges are by their very nature intended to be in environments of traffic noise.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.9 Travis Hill Historic District**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Travis Hill Historic District. The district will be affected by the undertaking, but the effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.” Tree clearing and the improvement to Stones Crossing Road do not encroach into the historic property boundary.

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting;” however, improvements to Stones Crossing Road will occur adjacent to the historic property boundary.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” as the district would have a view to tree clearing outside the district and noise will increase from 53.9 dBA to 60.6 dBA at one of the receivers in the district. A second, more remote location within the district will experience a decrease in dBA. The projected noise levels at these receivers do not rise to the level of an adverse effect, per INDOT’s noise policy. In addition, Stones Crossing Road would be realigned farther to the south introducing visual changes to the area. However, homes within the district are on heavily wooded lots and would not have a view to the undertaking. Therefore, the effect is not considered adverse.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.10 John Sutton House**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the John Sutton House. The property will be affected by the undertaking but not adversely.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.” The mainline will be located about 500 feet from the house.

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is approximately 500 feet from the house, but the property is presently along a busy highway.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” with the construction of the undertaking and an interchange to the north. However, modern intrusions—including modern buildings and SR 37—are already present around the property. The ambient noise reading for the John Sutton House is 57.4 dBA; in the design year 2045, noise modelers project a noise reading of 64.0 dBA or an increase of 6.6 dBA, which is below INDOT criteria for an adverse effect. Per this policy, the effect will not be considered adverse.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

### **5.11 Marion County Bridge 4513F (NBI No.: 4900484; Non-Select)**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Marion County Bridge 4513F. The bridge will be affected by the undertaking, but the effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is no closer to the bridge than is present SR 37, but Preferred Alternative C4 will be elevated above SR 37’s present elevation. The preferred alternative does not adversely affect the qualities for which this bridge was determined eligible.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” with the construction of new, raised bridge near the existing bridge. Access to the bridge will also take longer due to the construction of the limited access interstate. These changes will not affect the ability of the bridge to convey its engineering significance; therefore, the effect is not considered adverse. Noise will not affect the integrity of this property since bridges are by their very nature intended to be in environments of traffic noise.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.12 Cleary-Barnett House**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Cleary-Barnett House. The House will be affected by the undertaking, but that effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is located approximately 1,900 feet from the undertaking and is set on a heavily wooded lot.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements.” Noise will increase from 49.9 dBA in the current year to 55.2 dBA in design year 2045; this is not considered an adverse impact per INDOT’s noise policy. Furthermore, the undertaking is located at a distance of approximately 1,900 feet.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.13 Glenn’s Valley Nature Park Retreat House**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Glenn’s Valley Nature Park Retreat House. The House will be affected by the undertaking, but the effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The preferred alternative is located approximately 1,670 feet from the undertaking and is set on a heavily wooded lot.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements”. The undertaking is located at a distance of approximately 1,670 feet. However, traffic could potentially change along Bluff Road; therefore, noise modeling was conducted to ascertain the effect. Noise is projected to increase from 47.5 dBA in the current year to 54.5 dBA in design year 2045; this is not considered an adverse impact per INDOT’s noise policy.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

#### **5.14 Glennwood Homes Association Historic District**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to the Glennwood Homes Association Historic District. The district will be affected by the undertaking, but the effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The undertaking is located 578 feet from the nearest point of the historic district.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” as the undertaking will be visible during certain times of the year with limited leaf cover but visual effects will not be adverse. Ambient noise levels have been measured at 54.3 dBA; these levels are predicted to increase to 63.0 dBA at the receiver closest to the undertaking in the design year 2045, which is not considered adverse per INDOT’s noise policy.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

#### **5.15 Le Ciel (Charles Laughner House)**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), do not apply to “Le Ciel” (Charles Laughner House). The property will be affected by the undertaking, but the effect will not be adverse.

Per 36 CFR 800.5(a)(2)(i), the undertaking will not cause “physical destruction of or damage to all or part of the property.”

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property will not be removed from its historic location.

Per 36 CFR 800.5(a)(2)(iv), there will not be a change “of the character of the property’s use or of physical features within the property’s setting.” The undertaking is located approximately 70 feet from the historic property boundary at its nearest point. The property’s access to SR 37 from Belmont will be changed with the construction of a cul de sac north of the Laughner House.

Per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements” as the undertaking will be visible, especially with the acquisition of Aspen Lakes Apartments just north of the property, during certain times of the year with limited leaf cover. However, the proximity of the property to the undertaking will not change. Ambient noise levels have been measured at 56.9 dBA; these levels are predicted to increase to 65.9 dBA in the design year 2045; which is not considered an adverse effect per INDOT’s noise policy.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no “transfer, lease, or sale of the property out of Federal ownership or control.”

## **5.16 Southside German Market Gardeners Historic District**

The criteria of adverse effect, as defined and described in 36 CFR 800.5(a)(1) and in 36 CFR 800.5(a)(2)(i) through (v), apply to the Southside German Market Gardeners Historic District. The district will be adversely affected by the undertaking.

Per 36 CFR 800.5(a)(2)(i), the undertaking will cause “physical destruction of or damage to all or part of the property.” The undertaking will remove a house located at 4401 Bluff Road, which is considered contributing to the district. Further, the undertaking will result in an acquisition of approximately six acres of land within the district.

Per 36 CFR 800.5(a)(2)(ii), there will be no “restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines.”

Per 36 CFR 800.5(a)(2)(iii), the property (in this case, the historic district) will not be removed from its historic location. However, the Contributing house at 4401 Bluff Road will be removed from its historic location as a part of the slide-slope construction.

Per 36 CFR 800.5(a)(2)(iv), there will be a change “of the character of the property’s use or of physical features within the property’s setting” as the I-465 bridge over Bluff Road will be replaced, widened, and elevated. The house at 4401 Bluff Road, a Contributing resource, will also be acquired, which will change the setting within the district. This will result in an adverse effect to the district.

Further, per 36 CFR 800.5(a)(2)(v), there will be an “introduction of visual, atmospheric or audible elements.” The project would replace and widen the I-465 bridge over Bluff Road. MSE retaining walls

would be used along the south side of I-465. A vegetated side-slope would be constructed along the north side I-465, west of Bluff Road. A combination of a vegetated side-slope and MSE walls would be constructed along north side of I-465, east of Bluff Road to avoid impacting electric transmission towers. The Contributing house located at 4401 Bluff Road would be removed as part of the side-slope construction. The introduction of MSE walls and the elevation of the bridge will constitute a visual adverse effect. With a retaining wall and safety barrier, the level of noise will decrease slightly (-2.7 dBA) and without it, it will rise slightly (0.4 dBA). However, this is presently a noisy district with an ambient noise reading of 69.7 dBA; changes in noise as a result of the undertaking will not constitute an adverse effect, per INDOT's noise policy.

Per 36 CFR 800.5(a)(2)(vi), there will be no neglect or deterioration of the property.

Per 36 CFR 800.5(a)(2)(vii), there will be no "transfer, lease, or sale of the property out of Federal ownership or control."

### **5.17 Archaeology Site 12-Mg-0556**

Site 12-Mg-0556 is located within Preferred Alternative right of way and has insufficient information to determine if it is eligible for inclusion in the NRHP. If the site cannot be avoided, it will be subject to additional investigation to determine if it is eligible for the NRHP. The additional investigation may be completed prior to the publication of the FEIS. If it is not completed before the FEIS is published, the FEIS will include a MOA or PA developed in consultation with the DHPA-SHPO.

### **5.18 Alluvial Floodplain Test Areas**

An alluvial floodplain south of Martinsville in the White River valley is located within Preferred Alternative right of way and has the potential to contain buried archaeological sites. Phase Ic studies were recommended for this area. If this area cannot be avoided, additional investigation will be conducted in the affected area(s) to further assess the nature of buried deposits and the probability of the area to contain buried cultural resources that could be eligible for the NRHP. The additional investigation may be completed prior to the publication of the FEIS. If it is not completed before the FEIS is published, the FEIS will include a MOA or PA developed in consultation with the DHPA-SHPO.

### **5.19 Actions to Avoid, Minimize, or Mitigate Adverse Effects**

Throughout the development of the project, engineers sought ways to minimize effects on historic properties. Specifically, to avoid adverse impacts to the following resources.

- Morgan County Bridge No. 224: project engineers did not cul de sac this bridge; public access is still maintained and the existing roadbed for Old SR 37 will be preserved.
- Top Notch Farm: engineers shifted the connection of Southview Drive and Mahalaville Road to the northwest to avoid the farm.
- Travis Hill Historic District: engineers aligned the Stones Crossing Road to avoid acquisition of property from the district and to minimize the tree cutting.
- Southside German Market Gardeners Historic District: engineers included MSE walls to avoid acquisition of additional property from the district. FHWA, INDOT, and their consultants met with residents to garner input regarding the introduction of a vegetated slide-slope or a wall along the north side of I-465. Comments received during that consultation are described in below.

### *Consulting Party Meeting Discussion*

At the Consulting Party Meeting held on August 17, 2016, Consultants discussed the kinds of effects that were studied and eligible properties, Percy Farm and Clear Creek Fisheries. Mitigation discussion followed. See Appendix M-4: Consulting Parties, for documents associated with this meeting including invitation, agenda, minutes, and consulting party comments.

### *Memorandum of Agreement (MOA)*

FHWA determined an Adverse Effect finding is appropriate for the I-69 Section 6 undertaking; therefore, a MOA will be executed. To mitigate the adverse effects on the Reuben Aldrich Farm, consultation with the property owner and consulting parties is being undertaken to evaluate vegetative screening, preparation of a NRHP nomination form, or other suitable mitigation. To mitigate the adverse effects on the Southside German Market Gardeners Historic District, consultation with property owners in the district and consulting parties has been undertaken to evaluate the use of retaining walls, vegetative screening and/or MSE wall treatments, preparation of a NRHP nomination form, signage, or other suitable mitigation.

To resolve any potential effects on archaeological resources, the MOA will stipulate the identification and evaluation efforts as well as any additional testing that should occur. If an eligible archaeological site is located, the MOA will stipulate avoidance or mitigation procedures. The MOA will be developed and signed by all appropriate signatories. FHWA will invite other consulting parties to sign the executed document as concurring parties

## **6.0 SUMMARY OF CONSULTING PARTIES AND PUBLIC VIEWS**

The following is a summary of the views of the consulting parties. Comments from consulting parties received prior to the publication of the DEIS and 800.11(e) documentation, and responses to these comments, are listed in the Consulting Party Comment/Response Form. See Appendix M-5: Correspondence/Comments Received. The following is a summary of all comments.

On June 25, 2004, the DHPA-SHPO responded to a submission (dated June 14, 2004) that detailed the proposed APE for the Section 6 project. DHPA-SHPO stated the proposed APE “appears to be appropriate.” DHPA-SHPO also noted that the APE may need to be adjusted in the future if “specific kinds of effects or geographic issues...come to light.” See Appendix M-3: DHPA-SHPO and THPO Coordination.

On June 29, 2004, Zach Pahmahmie, the Tribal Chairman of the Prairie Band Potawatomi Nation, responded to the invitation to join consultation sent by FHWA on May 18, 2004. Pahmahmie stated “we have no objections” to the project and “we are unaware of any historical cultural resources in the proposed development area.” However, Pahmahmie requested “to be immediately contacted if any inadvertent discoveries are uncovered at any time throughout the various phases of the project.” See Appendix M-5: Correspondence/Comments Received, for a copy of the letter.

On July 2, 2004, the first consulting party meeting was held. Consultants discussed the role of consulting parties in the Section 106 review process, the APE, and the potential historic properties within the APE. A representative from INDOT asked about the qualifications for a “master” builder, as described in Criterion C. The project team responded that there must be some documentation to help establish information of the builder as a master and that most would agree on the designation once made. The Morgan County Historian asked about the MOA process for the project and voiced concerns regarding the protection of cemeteries (specifically that many are unmarked and/or easily missed). Project team

members responded that research continued to document area cemeteries. Consulting parties also inquired about access to the fire station on SR 44, to the hospital, and to local access roads (all of which are not Section 106 issues). Finally, the representative from Traditional Arts Indiana asked questions about the 50-year age window for surveyed properties and potential project delays and requested consideration of resources such as orchards and fish ponds. Project team members responded that properties might need to be reconsidered if delays occur and that the Section 106 process is bound by the National Register criteria. See Appendix M-4: Consulting Parties for invitation, agenda, presentation materials, and a summary of the meeting.

A second consulting party meeting was held on August 31, 2005; this meeting focused on discussion of the draft HPR, which identified and evaluated the eligibility of properties in the APE for inclusion in the NRHP. The Morgan County Commissioner asked how the APE was developed and why the Nutter House was included in the survey due to its distance from SR 37. It was noted that the survey area was wider than that 1,000-foot corridor due to the potential for effects. Consulting parties also asked why no information on the East Washington Street Historic District within Martinsville, Indiana was included in the consulting party packet. It was noted that the draft HPR included information on the East Washington Street Historic District. Pauline Spiegel asked why the Ozark fisheries and ponds were not included in the historic property boundaries. The project team showed that the draft HPR did include contributing ponds from the Ozark property. See Appendix M-4: Consulting Parties for invitation, agenda, presentation materials, and a summary of the meeting.

On September 7, 2005, DHPA-SHPO provided comments on the draft HPR sent on August 15, 2005, with the invitation to the second consulting party meeting. DHPA-SHPO agreed with the eligibility and non-eligibility assessments for the properties identified in the report. However, the DHPA-SHPO noted “the concrete girder bridge carrying Old SR 37 over crooked Creek appears to be very similar to Morgan County Bridge #166” which had been previously determined eligible. DHPA-SHPO asked for additional information as to why the concrete girder was not individually eligible for the NRHP. (See Appendix M-3: DHPA-SHPO and THPO Coordination for a copy of the letter.)

In a letter dated September 13, 2005, the Morgan County Historic Preservation Society responded to the draft HPR and provided information on the former Morgan County Home, the Gano Greenhouse, and a property located at 1009 South Ohio Street. The Society was dissatisfied with the lack of an interview with the Ed Ferguson, as “[h]e’s the only one who would really know what kind of alterations have occurred on the property.” The Society added that “the ponds alone are historically significant even if the attendant Grassyfork building no longer exist [sic].” Lastly, the Society stated that the rating for the Reuben Aldrich Farm should be elevated to “C[ontributing] if not O[utstanding]” and called the barn “truly remarkable and quite unusual.” The Society requested that the historians justify the rating for the Aldrich Farm. See Appendix M-5: Correspondence/Comments Received, for a copy of the letter.

In a letter dated September 13, 2005, and prepared in response to the draft HPR and Consulting Party Meeting held August 31, 2005, Morgan County Historian questioned the absence of some cemeteries involved in the report and noted five cemeteries within the corridor in Morgan County. The Morgan County Historian said that the Mitchell Cemetery was within the wooded area excluded from the recommended property boundary for Top Notch Farm and asked, “Why was that area really excluded? Do you intend to ignore the involved cemeteries and merely bulldoze your way through them?” See Appendix M-5: Correspondence/Comments Received, for a copy of the letter.

In an email dated September 14, 2005, and prepared in response to the HPR and Consulting Party Meeting held August 31, 2005, Traditional Arts Indiana provided comments relating to resources within the APE (and also included the comments of the Morgan County Historian, the Morgan County Historic Preservation Society and Dale Drake with her email). She requested that project team members go inside

the barn on the Reuben Aldrich Farm property, noting that the barn's hay loft is suspended by iron rods. She added that the house could be of greater significance than its Notable rating. The email included a thread of emails with comments from two other consulting parties that were also delivered in letter form on September 13, 2016. There was also a note from Dale Drake which stated that he agreed the Reuben Aldrich farm is a significant historic property. He also stated that "there is an unmarked family cemetery between the house and river. The Aldrich family members were moved from that cemetery to ... the nearby IOOF cemetery, but the workers and servants buried there were not." See Appendix M-5: Correspondence/Comments Received, for a copy of the letter.

In a letter dated November 21, 2005, DHPA-SHPO responded to the additional information provided by the project team on October 24, 2005, regarding the concrete girder bridge carrying Old SR 37 over Crooked Creek. DHPA-SHPO agreed with the assessment and had no further concerns regarding the bridge. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On January 9, 2006, DHPA-SHPO staff members attended a field tour with project team members, visiting several structures that were surveyed within the project APE. DHPA-SHPO offered guidance for evaluating properties and on the potential effects from the project going forward. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a meeting summary.

On December 21, 2006, DHPA-SHPO responded to a draft version of the *I-69 Phase Ia [Archaeological] Literature Review* for Section 6. DHPA-SHPO suggested citation additions and corrections, in addition to suggesting some alterations to the contextual information. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On July 25, 2008, DHPA-SHPO concurred with the HPR sent on June 25, 2008, regarding the eligibility or ineligibility for the NRHP of the properties identified in the Section 6 APE. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On January 13, 2015, a meeting was held between the project team and the DHPA-SHPO to address the methodology and eligibility criteria for the AI study for the I-69 Section 6 alternatives. It was agreed that the project team would use the previous established methodology for the project's preliminary new terrain alternatives. DHPA-SHPO indicated that SR 37 would likely look similar after the project "except in areas where there will be interchanges and access roads" so it "may not be as necessary to look as far as a new terrain road," however, locations with access roads may require an expanded survey area. See Appendix M-3: DHPA-SHPO and THPO Coordination for a summary of the meeting.

On March 10, 2015, DHPA-SHPO responded to the meeting minutes, revision to the APE, and methodology for the AI study. DHPA-SHPO asked for clarification as to whether FHWA and INDOT intended to adopt the DHPA's draft "Guidelines for Evaluating National Register Eligibility of Mid-Century Modern Housing and Post-War Suburbs." If FHWA and INDOT had not agreed to adopt those guidelines, DHPA-SHPO stated that "then we would renew our request now." In response to the memorandum entitled "Methodology for Section 6 Aboveground Survey & Reporting," DHPA-SHPO expressed concern over the usage of the National Cooperative Highway Research Program Report 723 and requested instead that DHPA-SHPO mid-century and post-war guidelines be followed. DHPA-SHPO understood that methodologies for archaeological predictive modeling and windshield surveys would be submitted for review and comment before implementation. DHPA-SHPO accepted the proposed APE (dated January 26, 2015), "subject to later revisions that would be reasonable or necessary." See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On May 14, 2015, members of DHPA-SHPO joined project team members for a Section 106 site visit of properties within the project's APE. The purpose of this site visit was to re-examine select properties

originally surveyed in 2004, to evaluate properties in the HPR (2008) that merited re-evaluation, and view properties newly surveyed as part of the AI study. During the visit, DHPA-SHPO offered guidance for evaluating properties and on the potential effects from the project. See Appendix M-3: DHPA-SHPO and THPO Coordination for a meeting summary.

DHPA-SHPO responded to the *Draft Purpose and Need Statement and Conceptual Alternatives for I-69 Tier 2 Studies for Section 6* in correspondence dated May 15, 2015. DHPA-SHPO stated that it would be “appropriate to compare at least such performance measures as driving time savings and accessibility (and other measures—or impacts—as appropriate) for the Tier 1 Preferred Alternative 3C and Tier 1 non-preferred alternatives that were discarded after the Tier 1 Draft EIS (DEIS) ... [i]f some impacts are included, we would be especially interested in seeing projections for impacts on other kinds of resources included.” DHPA-SHPO also stated that “without more information about the locations of the alternative corridors in relation to historic properties, we are unable to offer comments on the relative advantages or disadvantages or any of the conceptual alternatives in regard to foreseeable impacts on historic sites/districts or archaeological sites.” Finally, DHPA-SHPO noted that most of its comments may come during the Section 106 process, but “it will be incumbent upon INDOT or its consultants to ensure that those Section 106 comments are taken into account during the NEPA review process, as well. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

In a May 19, 2015 email, DHPA-SHPO responded with comments regarding the May 14 site visit to the Section 6 APE. DHPA-SHPO offered eligibility opinions on several properties in the project APE. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

DHPA-SHPO responded to an archeological memorandum regarding existing SR 37 right-of-way disturbance documentation and a predictive modeling methodology in a letter dated May 26, 2015. DHPA-SHPO staff concurred with the memorandum’s conclusion “that the area (Section 6, along SR 37) ... is disturbed and as such will not require archaeological investigation unless deemed necessary in the field during an investigation to be conducted in adjacent areas.” DHPA-SHPO also agreed with the use of predictive modeling to develop survey methods. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

In correspondence dated July 30, 2015, DHPA-SHPO responded to the *Preliminary Alternatives for the I-69 Tier 2 Studies for Section 106*, which they received via email from the INDOT project manager on June 30, 2015. DHPA-SHPO noted that while cemeteries are often of interest to historians, they “generally are not considered eligible for the National Register, except in unusual cases.” “[I]mpacts or the lack thereof on cemeteries were not mentioned as disadvantages or advantages in Appendix E.” Consequently, DHPA-SHPO surmised that “impacts on historic properties played no role in the winnowing of alternatives played no role in the winnowing of alternatives that has occurred to this point.” DHPA-SHPO also stated that it had “no comments about the Preliminary Alternatives at this time” and that it was “unable to draw conclusions about which alternatives might result in either more or fewer impacts to historic properties.” Finally, DHPA-SHPO hoped that “sufficient flexibility had been built into the alternatives to allow for avoidance of at least direct impacts on any historic properties that may lie within or nearby them.” See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On November 4, 2015, DHPA-SHPO responded to the invitation to become a consulting party and list of invited consulting parties, which was sent to them on via email on June 30, 2015 and formally provided via paper copy on October 15, 2015. DHPA-SHPO suggested that the Indianapolis Metropolitan Planning Organization and a representative from the City of Martinsville should be added as consulting parties, unless no alternatives pass through the city limits of Martinsville. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On December 2, 2015, the Acting THPO for the United Keetoowah Band responded to the invitation to attend the December 7, 2015 consulting party meeting (which was sent on November 19, 2015) by stating that the tribe would be unable to attend. The tribe hoped to continue consulting “through email or an individual government-to-government consultation.” See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

The third consulting party meeting held on December 7, 2015 was attended by representatives of DHPA-SHPO, FHWA, INDOT, the acting THPO for the Miami Tribe of Oklahoma, and six other consulting parties. Consulting parties asked how eligible properties would affect the building of roads in the area. Project team members responded that DHPA-SHPO will respond to any eligibility recommendation; then FHWA will issue a determination of eligibility. Afterward, the effect of the project upon the property will be assessed. If there is an adverse effect finding, a MOA will be negotiated. A property owner (Glennwood Homes Association) asked if both listed and eligible resources would receive the same level of scrutiny for effects. The project team said they would. Indiana Landmarks (formerly Historic Landmarks Foundation of Indiana) asked if any properties from the 2008 report were no longer recommended as eligible in the new survey. Project team members indicated that no historic property had been removed from eligibility status as a result of the new identification and evaluation efforts. Indiana Landmarks requested a contact person for concerns about project effects on historic properties. Indianapolis Historic Preservation Commission inquired about the dissemination of project updates. Project team members stated that all major updates are announced on the listserv and listed on the I-69 Section 6 website. See Appendix M-4: Consulting Parties for invitation, agenda, presentation materials, and a summary of the meeting.

On December 15, 2015, Indiana Landmarks responded to the AI No. 1. Landmarks concurred with the findings in the report regarding eligible properties in the APE. Landmarks noted that their foundation holds a Protective Covenant on the Grassyfork Fisheries Display and Showroom Building at 2902 E. Morgan St., Martinsville, which is located within the APE. Also, the letter noted that the Link Observatory, located west of the APE, “could potentially be adversely affect[ed]” by the project and requested that the project team determine the effects of increased light pollution of the undertaking on the observatory and its functions. Landmarks believed that the observatory was eligible for the NRHP. Landmarks noted that it appeared that project “Alternative C will best minimize harm to historic properties as outlined in the evaluation methods shared at the December 2015 Public Hearings.” Additionally, Landmarks expressed concern about effects to the NRHP-listed Nicholson-Rand House (5010 West Southport Road), which is outside the project APE for Alternative C but would be included in Alternatives K3 and K4. Landmark holds a Protective Covenant on the Nicholson-Rand House. The foundation requested “all efforts to minimize effects to this historic property.” See Appendix M-5: Correspondence/Comments Received, for a copy of the letter.

On December 21, 2015, DHPA-SHPO responded to AI No 1. and the information presented at the December 7, 2015, Consulting Party Meeting. DHPA-SHPO agreed with the conclusions stated in the report regarding the eligibility/ineligibility of properties for inclusion in the NRHP. DHPA-SHPO noted that it had received a copy of Landmark’s letter and that its concern regarding potential light pollution affecting the Goethe Link Observatory seemed “plausible.” It agreed that “consideration should be given to whether the APE should in some way be expanded to allow this kind of effect to be taken into account.” DHPA-SHPO also stated that Alternative C was the least likely to affect the use of the observatory because I-69 would be farther from the observatory than the other alternatives.” See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On January 26, 2016, INDOT met with representatives of the Goethe Link Observatory to discuss the concerns of the representatives regarding specific alternatives (B, D, K3, K4 and C) that were under consideration at that time. It was the understanding of the representatives that the observatory is NRHP

eligible. They expressed a concern about the effect of light on the observatory and the potential light that an interchange may bring: interstate lighting and car headlights as well as possible additional development and associated lighting. They explained that if Alternative B were selected it could affect the existing facility as well as the planned future use. The representatives indicated Alternative C, representing alternatives along SR 37, is not a concern due to the distance from the observatory and there would be enough filters between the two facilities; in addition, there is an existing roadway there. See Appendix M-5: Correspondence/Comments Received.

On February 4, 2016, DHPA-SHPO responded to the Archaeological Literature Review, submitted on January 4, 2016. DHPA-SHPO concurred with the opinions of the archaeologist as expressed in the Phase Ia Archaeological Literature Review for Section 6 Preliminary Alternatives in Hendricks, Johnson, Marion, and Morgan Counties (McCord and Baltz, 11/13/2015) “that significant archaeological resources occur within the Section 6 study area” and that after alternatives are chosen an archaeological reconnaissance survey of the proposed project area should be conducted.” DHPA-SHPO noted that once the archaeological reconnaissance survey report was submitted, staff would “resume identification and evaluation procedures for this project.” See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On April 5, 2016, the Acting THPO for the Miami Tribe of Oklahoma responded to the Phase Ia Archaeological Survey 1 for Section 6 that was sent on March 23, 2016. The Tribe stated that it had no objection to the project at this time “as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site.” However, the letter continued, since “this site is within the aboriginal homelands of the Miami Tribes, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery.” Finally, the Miami Tribe requested to continue serving as a consulting party. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On April 5, 2016, a project team member received a telephone call from the owner of the John Sutton House, who stated that she had not received an invitation to join in consultation on the Section 6 project and asked to be added to the consulting party list. The owner said that her property was not listed in the NRHP and she did not want it listed. She also indicated that she leases part of her property to a cell tower company and that they might move the tower if the interstate will impact it. See Appendix M-5: Correspondence/Comments Received, for documentation regarding this conversation.

On April 14, 2016, DHPA-SHPO responded to the *Phase Ia Archaeological Survey 1 for Section 6, Indian Creek South of Martinsville to Teeters Road, Morgan County*, which was sent to them on March 14, 2016. DHPA-SHPO concurred with the archaeologists’ conclusions that sites 12-Mg-0551, 12-Mg-0552, 12-Mg-0553, 12-Mg-0554, 12-Mg-0555, 12-Mg-0557, and 12-Mg-0558 are not eligible for inclusion on the NRHP and that there was insufficient information regarding site 12-Mg-0556 to determine if it is eligible. DHPA-SHPO also stated that Field 1 of Segment 2 was suitable to contain buried cultural remains and should be subjected to Phase Ic investigations. DHPA-SHPO also concurred that there is insufficient information to determine if site 12-Mg-0525 is eligible for the NRHP but the staff understood that the site was to be avoided by all project ground-disturbing activities. DHPA-SHPO stated that site 12-Mg-0525 must either be avoided by all project activities or subjected to further archaeological investigations in accordance with the Secretary of the Interior’s Standards and Guidelines. DHPA-SHPO also reiterated their previous opinion that there was insufficient information to determine if site 12-Mg-0052 is eligible for the NRHP or to what extent the site has been destroyed by modern development, but that the portions that are within the proposed project area do not appear likely to contain intact archaeological deposits. DHPA-SHPO stated that no further investigations of these portions of the site

were necessary but the site should be marked so that it is avoided by all ground-disturbing project activities. If avoidance was not feasible, further archaeological investigations must be done. DHPA-SHPO also stated that it had not previously received a copy the Phase Ia Interim Report (Anderson, 2006), which is located in Appendix A of this report, for review and concurrence, although some of the site records associated with those archaeological investigations were submitted to the SHAARD database. DHPA-SHPO had not reviewed the sites for an NRHP-eligibility determination. Finally, DHPA-SHPO noted that sites 12-Mg-0551-12-Mg-0558 were now entered into the SHAARD database and would be reviewed and specified that the resurvey record for site 12-Mg-0052 should be submitted to the SHAARD database also. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On April 20, 2016, a Section 6 Resource Meeting was held. DHPA-SHPO attended this meeting with other resource agencies. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a summary of the meeting.

On April 21, 2016, members of the project team met with the survey and registration staff of DHPA and a DHPA-SHPO staff member to discuss a potentially eligible resource in the expanded APE and the status of the Southside German Market Gardeners Historic District. Regarding the property in the expanded APE, DHPA staff agreed that the Percy House & Clear Creek Hatchery (later called Percy House & Clear Creek Fishery) would be eligible under Criterion A and suggested that the house could also be considered eligible under Criterion C. The DHPA staff concurred that the Southside German Market Gardeners Historic District was eligible for the NRHP and exhibited a phenomenon of small truck farms. DHPA-SHPO also noted that I-465 creates a “dead zone” that splits the district into north and south sections but that nothing was gained by dividing the district into two smaller districts. A Contributing house at 4401 Bluff Road in the northwest quadrant of the district is located on the I-465 right of way line, but it was agreed that its positioning in the right of way did not change its Contributing status. DHPA-SHPO staff said that the house should be considered Contributing if a connection with the market gardeners could be demonstrated. The project team arranged with DHPA-SHPO to set up a field visit the first week in May to review the district and other properties in the AI No. 2 study and to discuss the effects of the undertaking. Project team members agreed to research a connection between the house and the Southside German Market Growers Association. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a summary of the meeting.

On May 2, 2016, representatives of FHWA and INDOT accompanied staff from the SHPO’s office on a site visit to discuss effects of the project on historic properties. At the Southside German Market Gardeners Historic District, DHPA-SHPO asked if right of way would be required under all the alternatives. DHPA-SHPO noted that the existing interstate already created an intrusion on the Southside Market Gardeners Historic District, but the project would have an adverse impact on the house at 4401 Bluff Road because of the planned addition of a new wall and removal of vegetative screening. DHPA-SHPO also noted that the project might not have an adverse impact on the house at 4425 Bluff Road because the installation of a new wall or slope might not make a notable difference to the property. DHPA-SHPO staff also stated that the district could be split into two (north and south) but little would be gained by doing so. DHPA-SHPO also reviewed potential effects to the Glennwood Homes Association, Cleary-Barnett House, and Glenn’s Valley Nature Park Retreat House, Marion County Bridge No. 4315 F, John Sutton House, Reuben Aldrich Farm, Top Notch Farm, Morgan County Bridge No. 224, Percy Farm & Clear Creek Fisheries, Travis Hill Historic District, and the Charles Laughner House (Le Ciel). Consultants provided information on May 3, 2016. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a summary of the meeting.

On May 11, 2016, DHPA-SHPO responded to the Preliminary Alternatives Screening Report, which it received as an email hyperlink on March 30, 2016, and to the May 2, 2016, site visit. DHPA-SHPO noted that Southside German Market Gardeners Historic District was the most likely to incur adverse effects,

especially the house at 4401 Bluff Road and possibly the house at 4425 Bluff Road. DHPA-SHPO stated that the setting of Marion County Bridge No. 4315F could be adversely affected, depending upon the height of any new bridge built to allow I-69 to cross the Pleasant Run Creek and the distance of the undertaking from the historic bridge. DHPA-SHPO offered an initial opinion that it did not appear the undertaking would adversely impact Travis Hill Historic District, but added “[d]etermining whether that effect would be adverse would require more detailed information about the nature of improvements to that part of Stone’s Crossing Road.” Likewise, DHPA-SHPO stated that to assess the projects effect on the Percy Farm & Clear Creek Fisheries, they would need to know the “nature and extent” of road improvements; DHPA-SHPO requested “more precise information” so that their office could offer more specific comments on effects. DHPA-SHPO also noted that while the other properties discussed during the site visit may incur visual effects, they were less likely to suffer adverse effects than those noted above. DHPA-SHPO reminded that their most recent comments on archaeology were provided in letters dated February 6, 2016, and April 14, 2016. DHPA-SHPO also noted that certain tables in the screening report identified only one historic property impact for each alternative alignment and stated, “[w]e sense that perhaps only direct, physical impacts on historic above-ground properties have been identified so far.” DHPA-SHPO also noted that the Stockwell Bridge (Morgan County Bridge No. 56) appeared on mapping in the screening report, that bridge has been demolished by the county. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On June 1, 2016, DHPA-SHPO staff commented on the summary of meeting/meeting minutes from the May 2, 2016 site visit. DHPA-SHPO noted that the Southside Market Gardeners Historic District section needed clarifying language concerning the walls that might be constructed as part of the project. Also, DHPA-SHPO clarified its statements regarding the areas around the Top Notch Farm being already heavily altered. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the email.

On July 14, 2016, DHPA-SHPO responded to the Section 6 Eligibility Determinations of the AI No. 2, which it was sent on June 15, 2016. DHPA-SHPO was satisfied with the APE offered in the memo. DHPA-SHPO concurred that the Percy Farm and Clear Creek Fisheries was eligible for the NRHP under Criterion A and that the farmhouse would be individually eligible under Criterion C. Further, DHPA-SHPO agreed that the Percy Farm and Clear Creek Fisheries is the only aboveground property in the newly expanded APE that is eligible for the NRHP. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

On July 15, 2016, the Morgan County Historian sent a letter to project team members stating that she concurred with the conclusions of AI No. 2 finding that the Percy Farmstead and Clear Creek Fisheries are eligible for the NRHP. She also requested information about all possible I-69-related projects that may impact the property and indicated that she would be assisting the owners of the Percy Farmstead in nominating their property for the NRHP. See Appendix M-5: Correspondence/Comments Received, for a copy of the letter.

A consulting party meeting held on August 17, 2016, discussed the Findings of Effects for properties identified in the AI No. 1 and AI No. 2. (All reports had been made available on INDOT’s IN-SCOPE website and when requested, paper copies had been sent to consulting parties.) In addition to representatives from FHWA, INDOT, and SHPO, five consulting parties attended. An overview of archaeological efforts was presented. The recommended effect for the project was “Adverse Effect” since adverse effects were noted for the Southside German Market Gardeners Historic District and the Reuben Aldrich Farm. DHPA-SHPO asked why traffic would increase in the area around the Reuben Aldrich Farm and project team members noted that the area would carry local traffic after the limited access interstate was constructed. The tree clearing near Travis Hill Historic District was discussed since traffic and visual changes would constitute an indirect effect that could be concealed by the trees. DHPA-SHPO asked where Belmont Avenue would be closed after construction; the project team indicated that it would

be south of the Aspen Lake Apartments. The Southside German Market Gardeners Historic District would incur an adverse effect under all alternatives but INDOT asked that discussion focus upon which option—walls or earthen slopes—would cause less harm along I-465 at Bluff Road. DHPA-SHPO said that they thought walls would be less harmful since they would not extend as far into the district as an earthen slope would. The property owner of the Sutton House indicated that a landscaped slope might be more conducive to a garden district. A property owner along Bluff Road inquired about the reported future decrease in traffic along Bluff Road since she believed that there would be more local traffic; an INDOT representative said that he would check on that. DHPA-SHPO indicated that additional questions may be posed via email regarding Marion County Bridge No. 4315F; even though setting may be a lesser consideration for Criterion C properties, DHPA-SHPO indicated that it was not an irrelevant aspect of integrity. It was asked if Bridge No. 4315F would remain open to provide access for Bluff Road property owners and was told it would. It was then asked if INDOT would be open to possibly using a wall material that would be conducive to the growth of vegetation in the Southside German Market Gardeners Historic District. See Appendix M-4: Consulting Parties for invitation, agenda, presentation materials, and a summary of the meeting.

On August 26, 2016, DHPA-SHPO emailed the project consultants to ask questions about Marion County Bridge No. 4315F in response to information presented at the August 17, 2016, consulting party. Specifically, DHPA-SHPO asked for approximate distances for the following points: “1) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 ROW. 2) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 northbound bridge (or roadway, if applicable, but I’m thinking it’s on the SR 37 bridge). 3) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge ROW. 4) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge or roadway. 5) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C3 northbound bridge ROW.” See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the email.

On September 1, 2016, DHPA-SHPO responded to the I-69 Section 6 Identification of Effects Report, Consulting Party Meeting minutes, and W&A responses to previous questions about Alternatives C2 and C3 relative to Marion County Bridge No. 4513F, which were submitted on August 4, 2016 and via email on August 29, 2016. DHPA-SHPO agreed with the finding of adverse effect for the Reuben Aldrich Farm due to the proposed increase in traffic along I-69; however, DHPA-SHPO also noted it was hard to gauge how burdensome the traffic increases would be to the property. For mitigation, DHPA-SHPO suggested that the project team obtain input from the owners of the farm and perhaps pursue vegetative screening since “meaningful mitigation for that particular adverse effect seems to be difficult.” DHPA-SHPO also stated that it did not believe that Marion County Bridge No. 4315F would suffer an adverse effect from any of the project alternatives, because its distance (of at least 71 feet) would be sufficient to avoid adversely affecting the historic bridge’s setting or viewshed. DHPA-SHPO also noted that it did not have a preference between a mechanically stabilized earth retaining wall or a sloped earthen embankment along I-465 at the Bluff Road overpass, but stated that a textured or scored surface might be best, especially one treated with a graffiti-resistant coating. In addition, DHPA-SHPO stated that “if the house at 4401 Bluff road is removed, the district will lose a contributing building, but, as a practical matter, it is difficult to foresee that house being considered suitable for human habitation and continuing to exist in the long run, due to its proximity to the highway and the existing traffic noise.” DHPA-SHPO stated that another mitigation measure for the Southside Market Gardeners Historic District might be to widen the opening under I-465 to reduce the visual effect of the highway as a barrier between the north and south sections of the district, although this would necessitate lengthening the bridges and increase project costs. Finally, DHPA-SHPO noted that it agreed with the Effects Report that any alternatives of the I-69 Section 6 project would have an overall adverse effect on historic properties. See Appendix M-3: DHPA-SHPO and THPO Coordination, for a copy of the letter.

At a meeting held October 4, 2016, for residents of the Southside German Market Gardeners Historic District, representatives of FHWA and INDOT and nine property owners attended the meeting. Attendees asked questions and provided comments about the project activities that would take place within the eligible historic district. One property owner expressed concern over the level of noise, especially since “noise is very loud and almost unbearable in the summer” and asked if a retaining wall is the same as a noise wall. It was explained at the meeting (and noted in the meeting summary) that a retaining wall is not the same thing as a sound barrier. It was also noted that a noise analysis will be completed and included in the DEIS. One person asked what made the area historic. The project team explained it is eligible for listing in the NRHP because of its long association with German Market Gardening/Farming. Properties eligible for listing are treated the same as properties already listed in the NRHP. Another asked how listing the district in the NRHP would affect the area. That project team explained that if there is a federal action, such as the construction of a federally funded highway project, the effects of that project on the historic district must be taken into account. If there are too many alterations to properties within the historic district, it could be delisted. Restrictions of use could come from its designation as a local district but that is not known to be the case in this area now. A copy of the meeting summary and a summary of the noise analysis were sent to consulting parties on October 28, 2016. See Appendix M-5: Correspondence/Comments Received, for a copy of the cover letter to consulting parties, the meeting, and exhibits from the meeting sent on October 28, 2016.

On October 6, 2016, Southside German Market Gardeners Historic District resident Judy Brehob expressed a preference for a slope instead of a wall to be used in construction of the project. (See Appendix M-5: Correspondence/Comments Received, for a copy of the email.)

On October 14, 2016, Southside German Market Gardeners Historic District resident Mary Kocher offered the following concerns about the project: “NOISE LEVEL will increase even more. We are not a densely populated area, and we do not fit the normal criteria for soundwalls. FLOODING with the possibility of more water being pushed to the creek which already is unable to handle the water runoff. LANE EXPANSION effect on the area property and homes. We are strongly in favor of a sound barrier wall so we would like to know with the expansion is this a possibility?” She also asked about the area being eligible for a historic district. See Appendix M-5: Correspondence/Comments Received, for a copy of the email.

INDOT met with the property owners of 4401 Bluff Road on October 17, 2016, to discuss the MSE wall versus side-slope design options. The owners indicated they would rather INDOT acquire the house if the MSE wall was selected. They noted the vibration and sound would not make living in the house a reasonable and practical option with a wall 35 feet from the house. The owners stated that the house was built of unreinforced masonry (not frame) and cannot be moved. They also indicated the house could potentially be damaged during construction due to the vibration from construction machinery.

On November 28, 2016, DHPA-SHPO responded to INDOT’s letter containing noise data and the request for comment on the “preferred option in the northeast corner of Bluff Road and I-465” which had been sent on October 28, 2016. DHPA-SHPO stated “[w]e accept the recommendation that an earthen slope be constructed east of Bluff Road and north of I-465 within the Southside German Market Gardeners Historic District, with MSE (i.e., mechanically stabilized earth) retaining walls being constructed around the electric transmission towers to the east of the house at 4401 Bluff Road.” Although this would result in the acquisition of a contributing property at 4401 Bluff Road, leaving the house in place by utilizing the retaining wall “does not appear to be prudent.” DHPA-SHPO concluded that: “For these reasons, we are not asking that this project avoid taking the house at 4401 Bluff Road by constructing an MSE wall as close as 35 feet away from the house.” (See Appendix M-5: Correspondence/Comments Received.)

No other comments were received.

A public notice of “Adverse Effect” will be posted in a local newspaper and the public will be afforded thirty (30) days to respond. If appropriate, this document will be revised after the expiration of the public comment period.

**ADDENDUM**  
**FEDERAL HIGHWAY ADMINISTRATION DOCUMENTATION OF SECTION 106**  
**FINDING OF ADVERSE EFFECT SUBMITTED TO THE STATE HISTORIC**  
**PRESERVATION OFFICER**  
**PURSUANT TO 800.6(a)(3)**  
**I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDY: SECTION 6, SR 39 TO I-465**  
**DES NO.: 0300382**

The following document summarizes the consultation that took place after the publication of the Draft Environmental Impact Statement (DEIS) and distribution of the “Section 4(f) Compliance Requirements (for Historic Properties) and Section 106 Findings and Determinations: Area of Potential Effects, Eligibility Determinations, Effect Finding” and the “800.11 Documentation of Section 106 Finding of Adverse Effect” to consulting parties and Tribal Consultants.

## **2.0 EFFORTS TO IDENTIFY HISTORIC PROPERTIES**

### **2.2 Timeline of Consultation**

- **February 14, 2017:** FHWA signed a “Historic Properties Affected: Adverse Effect” finding for the undertaking, as documented in “Section 4(f) Compliance Requirements (for Historic Properties) and Section 106 Findings and Determinations: Area of Potential Effects, Eligibility Determinations, Effect Finding.”
- **March 17, 2017:** Notification of the availability of “Section 4(f) Compliance Requirements (for Historic Properties) and Section 106 Findings and Determinations: Area of Potential Effects, Eligibility Determinations, Effect Finding” and the “800.11 Documentation of Section 106 Finding of Adverse Effect” were sent via email for access on INSCOPE to consulting parties and to SHPO/DHPA. SHPO/DHPA was sent a paper copy of these items.
- **March 20, 2017:** INDOT-CRO transmitted the “Section 4(f) Compliance Requirements (for Historic Properties) and Section 106 Findings and Determinations: Area of Potential Effects, Eligibility Determinations, Effect Finding” and the “800.11 Documentation of Section 106 Finding of Adverse Effect” via email and INSCOPE to Tribal contacts.
- **March 20, 2017:** FHWA transmitted the 800.11(e) and “e106” submission form to the ACHP.
- **March 21, March 28, and April 4, 2017:** Legal Notice of Availability of I-69 Section 6 Tier 2 DEIS, Section 4(f) Compliance Requirements, Section 106 Findings and Determinations and Public Hearing was published in the *Daily Journal* (Johnson County), the *Indianapolis Star* (Marion County), the *Martinsville Reporter* (Morgan County).
- **April 6, 2017:** ACHP responded to the Finding of Effect and 800.11 Documentation and declined to participate in consultation at the time.
- **April 13, 2017:** SHPO/DHPA concurred with the Section 106 finding of Adverse Effect.

- **May 5, 2017:** SHPO/DHPA responded to the Draft Environmental Impact Statement (DEIS), which included the Finding of Effect and 800.11 Documentation, and requested revisions to the DEIS document based on the archaeology findings.
- **May 17, 2017:** The “I-69 Tier 2 Studies, Evansville to Indianapolis: Phase Ia Archaeological Survey 2 for Section 6” was mailed to DHPA/SHPO.
- **May 18, 2017:** Native American Tribes notified that the “I-69 Tier 2 Studies, Evansville to Indianapolis: Phase Ia Archaeological Survey 2 for Section 6” was available on INSCOPE.
- **June 6, 2017:** The Miami Tribe of Oklahoma responded to “I-69 Tier 2 Studies, Evansville to Indianapolis: Phase Ia Archaeological Survey 2 for Section 6.”
- **June 19, 2017:** SHPO/DHPA responded to “I-69 Tier 2 Studies, Evansville to Indianapolis: Phase Ia Archaeological Survey 2 for Section 6” and requested revisions.
- **June 27, 2017:** An agency meeting held for DEIS comment resolution.
- **July 7, 2017:** The revised “I-69 Tier 2 Studies, Evansville to Indianapolis: Phase Ia Archaeological Survey 2 for Section 6” sent to DHPA-SHPO for their records.
- **July 26, 2017:** FHWA notified ACHP that Indiana Landmarks had objected to the finding of No Adverse Effect on Travis Hill Historic District and the John Sutton House in correspondence in May and July 2017. FHWA requested that ACHP “review the finding and offer an opinion on the effects of the undertaking on the John Sutton House and Travis Hill Historic District.”
- **August 14, 2017:** Section 6 Resource Agency meeting was held to discuss the Refined Preferred Alternative (RPA).
- **August 17, 2017:** ACHP offered the opinion that “FHWA applied the Criteria of Adverse Effect correctly... on the two historic properties.”
- **September 13-14, 2017:** Letter was sent to SHPO/DHPA and to consulting parties summarizing how the comments of ACHP were considered. A memorandum discussing the RPA and its effects on historic properties was included. The finding remained Historic Properties Affected: Adverse Effect. The draft Memorandum of Agreement (MOA) was included with the letter and memorandum.
- **September 14, 2017:** SHPO/DHPA responded to materials discussed on August 14, 2017.
- **October 16, 2017:** SHPO/DHPA responded to the memorandum and draft MOA.
- **October 27, 2017:** Revised MOA sent to SHPO/DHPA and to consulting parties
- **October 27, 2017:** Native American tribes informed of the availability of the revised MOA.
- **November 3, 2017:** DHPA/SHPO concurred with revised MOA and sent signature

- **November 13, 2017:** MOA has been signed by all required and invited signatories.

#### **4.0 DESCRIPTION OF THE UNDERTAKING'S EFFECT ON HISTORIC PROPERTIES**

Since the publication of the DIES, INDOT has provided additional information about the undertaking in the vicinity of the Travis Hill Historic District and the John Sutton House. This additional information will not change the individual effect finding for either historic property.

##### **4.9 Travis Hill Historic District**

The refined preferred alternative includes Stones Crossing Road overpassing I-69 at the current Stones Crossing Road/SR 37 intersection. No retaining walls will be required for this option outside the immediate vicinity of the bridge. The existing Stones Crossing Road descends approximately 40 feet in elevation from Travis Hill as it approaches State Road (SR) 37. In the overpass option, Stones Crossing Road will descend approximately 30 feet in elevation from Travis Hill before it flattens out and climbs to overpass I-69. No work would take place within the boundaries of the Travis Hill Historic District. Trees would be cleared as a result of the undertaking under either option, and the northernmost homes on the west side of the district would likely experience some change in view.

The undertaking would affect, but not adversely, the Travis Hill Historic District.

##### **4.10 John Sutton House**

I-69 will cross over existing County Line Road. The grade difference between existing SR 37 and proposed I-69 will be approximately 0 to 5 feet in height where the roadway is closest to the Sutton House property. Side slopes will be grassed.

The undertaking will affect, but not adversely, the John Sutton House.

#### **6.0 SUMMARY OF CONSULTING PARTIES AND PUBLIC VIEWS**

A "Legal Notice of Availability of I-69 Section 6 Tier 2 DEIS, Section 4(f) Compliance Requirements, Section 106 Findings and Determinations and Public Hearing" was posted in the *Daily Journal* (Johnson County), the *Indianapolis Star* (Marion County), and the *Martinsville Reporter* (Morgan County) on March 21, March 28, and April 4, 2017. The public was afforded thirty (30) days to respond. No comments in response to the public notice were received. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

The ACHP responded to the Effect Finding (signed by FHWA on February 14, 2016) and 800.11 Documentation, and stated that "we do not believe our participation in the consultation to resolve adverse effects is needed." The Council added, "However, if we receive a request for participation from the . . . SHPO. . . Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision." The ACHP further requested to be notified "should circumstances change, and it is determined that our participation is needed to conclude the consultation process." Finally, the ACHP noted that filing of the MOA with the Council "is required in order to complete the requirements of Section 106 of the

National Historic Preservation Act.” (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

The SHPO concurred with the Effect Finding for the project, as well as the individual findings of effect for each historic property, in a letter dated April 13, 2017. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

In a letter dated May 5, 2017, the SHPO concurred with the DEIS conclusions that the Southside German Market Gardeners Historic District and the Reuben Aldrich Farm are the only aboveground resources that would be adversely affected as a result of the undertaking. Regarding archaeology, SHPO reiterated statements included in an April 14, 2016 letter. SHPO requested that the DEIS be revised to include the following:

- Site 12-Mg-0556 should be clearly marked and avoided by all ground-disturbing project activities or subjected to additional work if avoidance is not feasible.
- Field 1 of Segment 2 is suitable to contain intact buried cultural deposits, and should be subjected to Phase Ic archaeological investigations.
- Site 12-Mg-0525 will be avoided or subjected to additional testing if the proposed project area will include it.

(See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

Indiana Landmarks (Landmarks) responded to the Effect Finding and 800.11 Documentation in a letter dated May 8, 2017. Landmarks concurred with the NRHP eligibility findings and asked further questions about the undertaking as it related to the Travis Hills Historic District and the John Sutton House.

Regarding Travis Hills, Landmarks asked “whether the realignment of Stones Crossing Road would require the construction of a retaining wall where the road abuts the district.” Regarding the John Sutton House, Landmarks stated “we believe that the significant increase in elevation of the adjacent section of I-69 will have an adverse effect on the setting of the property and thus that the finding for this resource should be ‘adverse effect.’”

Landmarks concurred with the individual effect findings for the Reuben Aldrich Farm and the Southside German Market Gardens Historic District. Landmarks recommended FHWA fund the preparation of an NRHP nomination and the planting of vegetative screening for the Reuben Aldrich Farm. Similarly, Landmarks recommended preparation of an NRHP nomination and vegetative screening (as desired by the property owners) and that FHWA or their agents “ensure that all retaining walls conform to principles of context-sensitive design.” (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

In a letter dated May 31, 2017, Landmarks responded to the additional information provided by INDOT-CRO (May 18, 2017). Their letter stated, “Although we are pleased to learn that there will be no retaining walls added where Stones Crossing Road abuts the district, we are still concerned that the construction of an elevated access bridge might dramatically alter the approach to the district and thus impact the setting of multiple historic properties.” Regarding the John Sutton House, Landmarks contended that “under Criterion C, the setting, feeling, and association are still important” and that “the construction of I-69 represents a more drastic

alteration of the resource's setting, as the undertaking will require a major change in the elevation of the land surrounding the site." Further, Landmarks noted, "the construction of I-69 would also appear to require the destruction of trees that currently serve as a visual buffer and organic sound barrier. . ." Therefore, Landmarks maintained the project would have an adverse effect on the John Sutton House.

In the same letter, Landmarks concurred with the proposed mitigation measures for the Reuben Aldrich Farm and the Southside German Market Gardeners District and requested to be part of the Advisory Team. Landmarks also requested "a formal commitment from INDOT/FHWA to fund the preparation of a NRHP nomination for the Southside German Market Gardeners Historic District, contingent upon the consent of more than 50% of the property owners in the district." (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

A site visit was held with Indiana Landmarks, FHWA, INDOT, and INDOT's consultants to discuss the concerns raised by Landmarks in their letters of March 8 and May 31, 2017. During the meeting, Landmarks stated that their staff believes that the rate of assent on the new alignment of Stones Crossing Road from the new I-69 would constitute an adverse effect on the Travis Hill Historic District. Landmarks stated that their organization believes that the elevation of the undertaking and the removal of vegetation between the historic property boundary and the undertaking will constitute an adverse effect on the John Sutton House. Landmarks requested information on the number of acquisitions associated with the proposed Stones Crossing Road overpass. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

Indiana Landmarks acknowledge receipt of the Meeting Summary (June 12, 2017) in an email on July 5, 2017. In addition, Landmarks requested, "clarification on one point. Between the two alternatives for rerouting the entrance to Travis Hill, am I correct that only the second option would require the demolition of a house?" (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

Indiana Landmarks sent another letter regarding effects after receiving additional information on the project. Landmarks stated that the staff believed the project would continue to have an adverse effect on the John Sutton "as it will alter the character of the setting." Landmarks continued, "[a]lthough neighboring contemporary buildings may initially block parts of the ramp from view, our hope is that the John Sutton House will have a longer lifespan than some of the more recent and less significant buildings in its surroundings, and we want to anticipate the long-term effects of the I-69 ramp may have on this historic house's view-shed after some of the nearby structures are gone." Regarding Travis Hill, Landmarks expressed favor the option that would not require the additional relocation of a property. They added that "we still find that the change to the approach will have an adverse effect on the district insofar as it will alter the character of its setting." (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

On July 27, 2017, consulting party Marcia Smith asked for a paper copy of the information conveyed to the ACHP (July 26, 2017) and asked if, as the owner of the Reuben Aldrich Farm,

they would receive a plaque. Ms. Smith also inquired as to the status of noise studies and vegetative screening. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

The DHPA-SHPO stated in an email on August 7, 2017, that the revised Phase Ia Archaeological Survey 2 was “acceptable.” (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

The ACHP sent a letter dated August 17, 2017 stating that it was their opinion that “the FHWA has applied the Criteria of Adverse Effect correctly in this case and this letter provides the ACHP’s reasoning for this opinion” with regards to the individual effect findings for Travis Hill Historic District and the John Sutton House. Specifically, the Council added, “FHWA applied the Criteria of Adverse Effect correctly as the undertaking will not alter the character defining elements or the integrity of these two historic properties at the time it is implemented or in the future.” The ACHP concluded the letter by reminding, “In accordance with 36 CFR 800.5(c)(3), the FHWA is required to take into account this advisory opinion in reaching a final decision on its finding of effect, and to provide to the ACHP, Indiana SHPO, Indiana Landmarks, and any other consulting parties a summary of how these advisory comments were considered by FHWA. Once the summary of the decision has been sent to the ACHP and other parties, the FHWA’s responsibilities are fulfilled for this step in the Section 106 process.” (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

In an email on September 14, 2017, consulting party Melvin Crichton requested INDOT “do whatever is necessary to minimize...negative effects during construction.” Crichton also stated, “We hope that INDOT will use "quiet" road surfacing and even noise barriers, and have signs banning engine brakes in residential areas. That's probably an issue that has not yet been addressed, but I am putting our concerns forward now.” (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

SHPO sent a letter on September 14, 2017, responding to information discussed in resource agency meetings. SHPO offered no comments on the meeting minutes but noted, “the proposed project area appear to lie within 100 feet of Old Mount Olive Cemetery (CR-55-64 in the Indiana DHPA SHAARD database system) and within 100 feet of Bell Cemetery (CR-49-57 in the Indiana DHPA SHAARD database system). Please note that, if the proposed project area includes any areas within 100 feet of a cemetery, then a cemetery development plan may be necessary under IC 14-21-1-26.5.” (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

September 30, 2017 Marcia Smith, owner of the Reuben Aldrich Farm, asked if there would be an adverse effect at her property and if anything was required of her at this stage. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

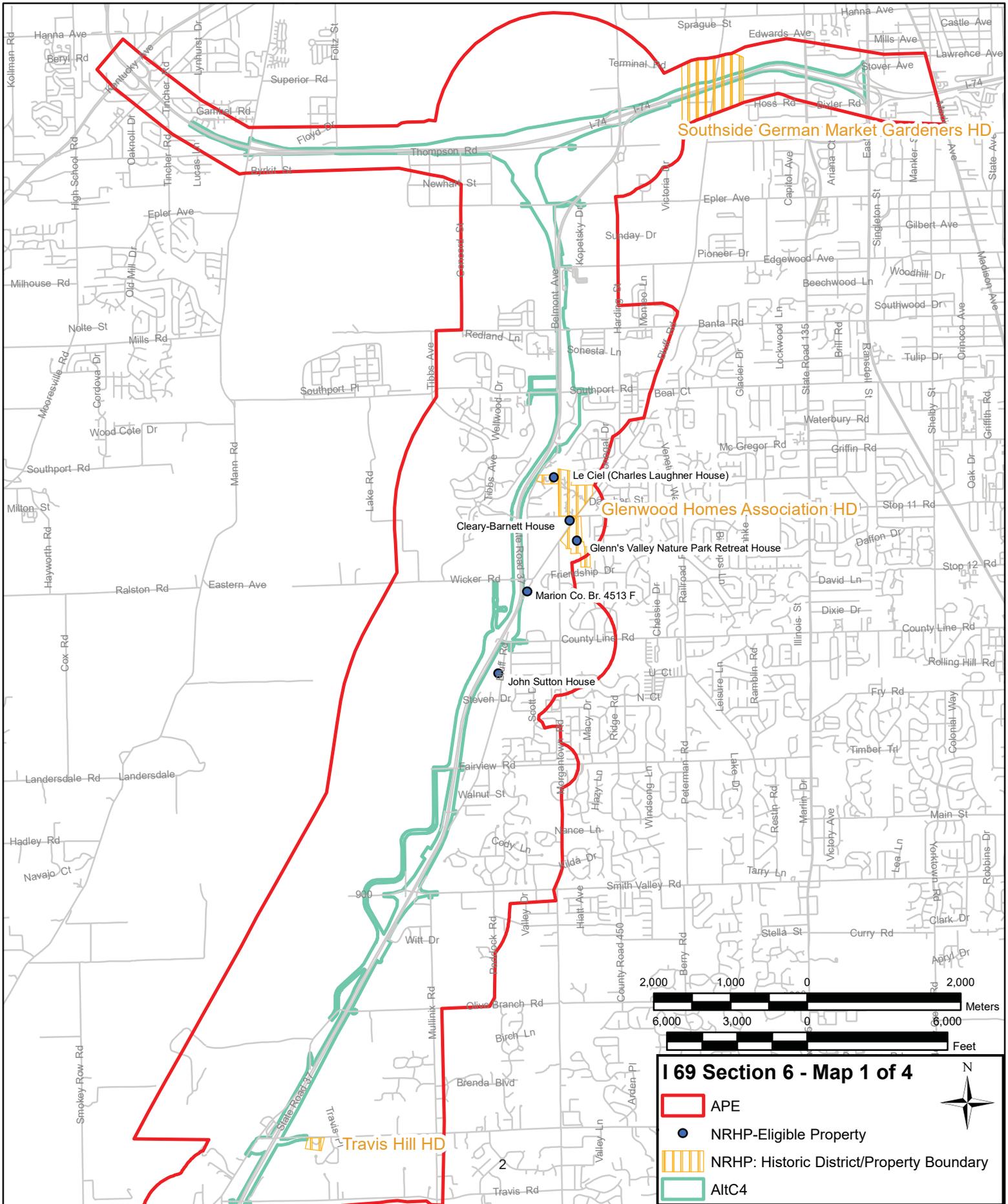
October 16, 2017, the SHPO responded to the draft MOA and refined preferred alternative. SHPO commented that the adverse effect would not be any greater under the RPA. SHPO asked questions and requested revisions to the draft MOA. SHPO also referenced earlier comments regarding archaeology and noted that if the project area would take place within 100 feet of the

Old Mount Olive Cemetery and Bell Cemetery, a cemetery development plan would be necessary. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

SHPO concurred with the revisions of the MOA in a letter dated November 3, 2017. (See Appendix M-7: Correspondence/Comments Received after Section 106 Review Period.)

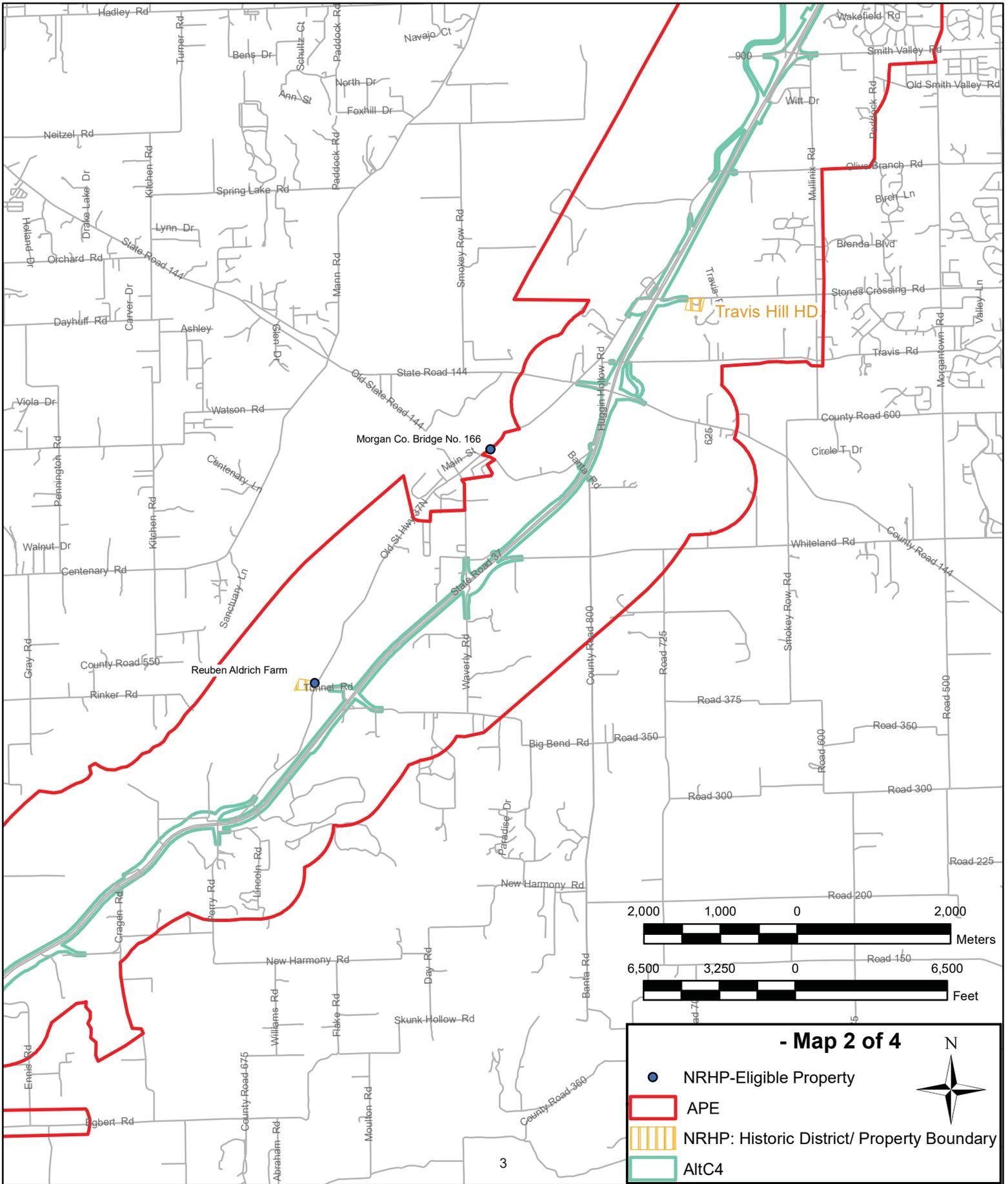
No additional comments were received.

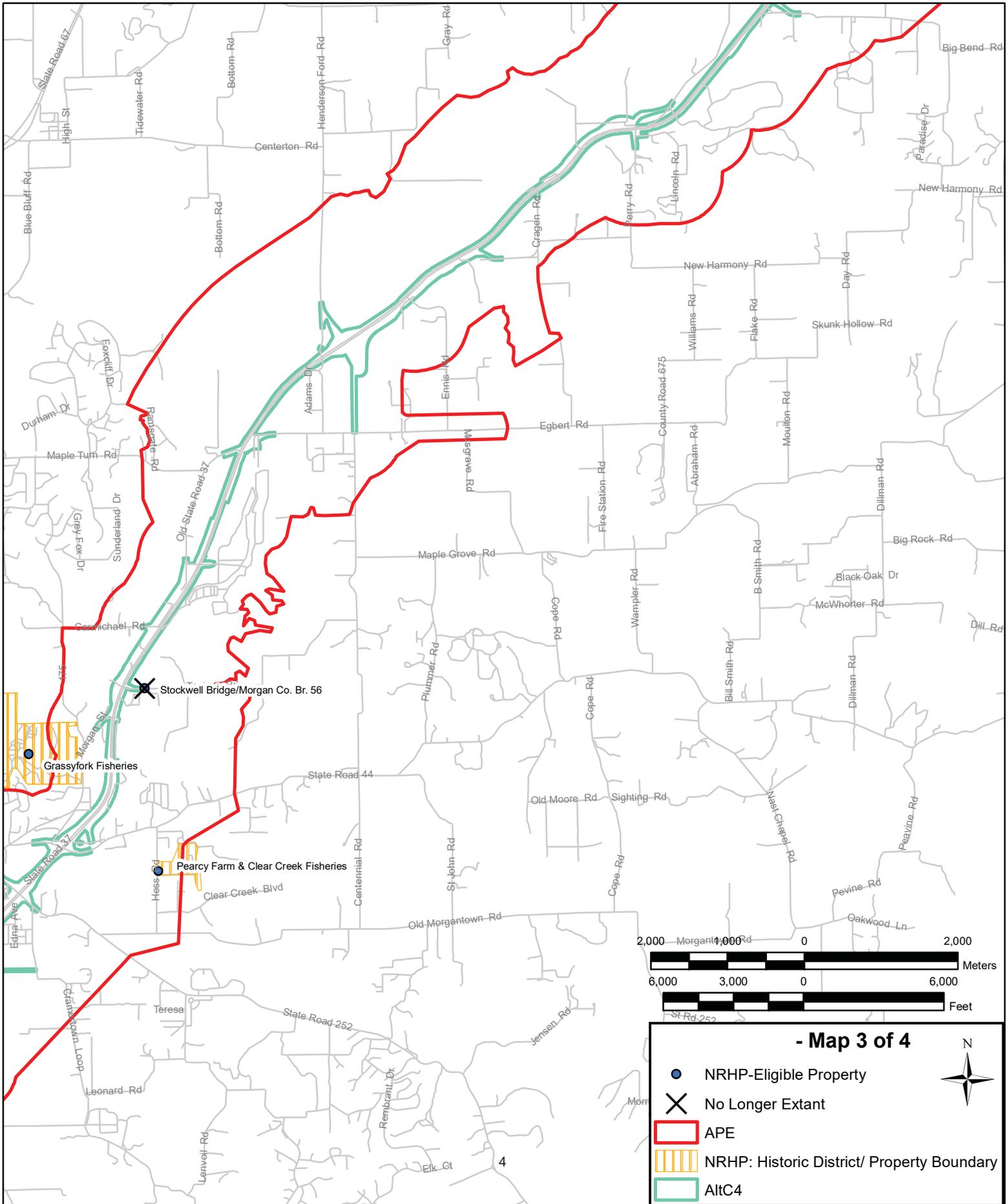
**APPENDIX M-1**  
**Area of Potential Effect Maps**  
**Preferred Alternative Maps**



**I 69 Section 6 - Map 1 of 4**

- APE
- NRHP-Eligible Property
- NRHP: Historic District/Property Boundary
- AIC4

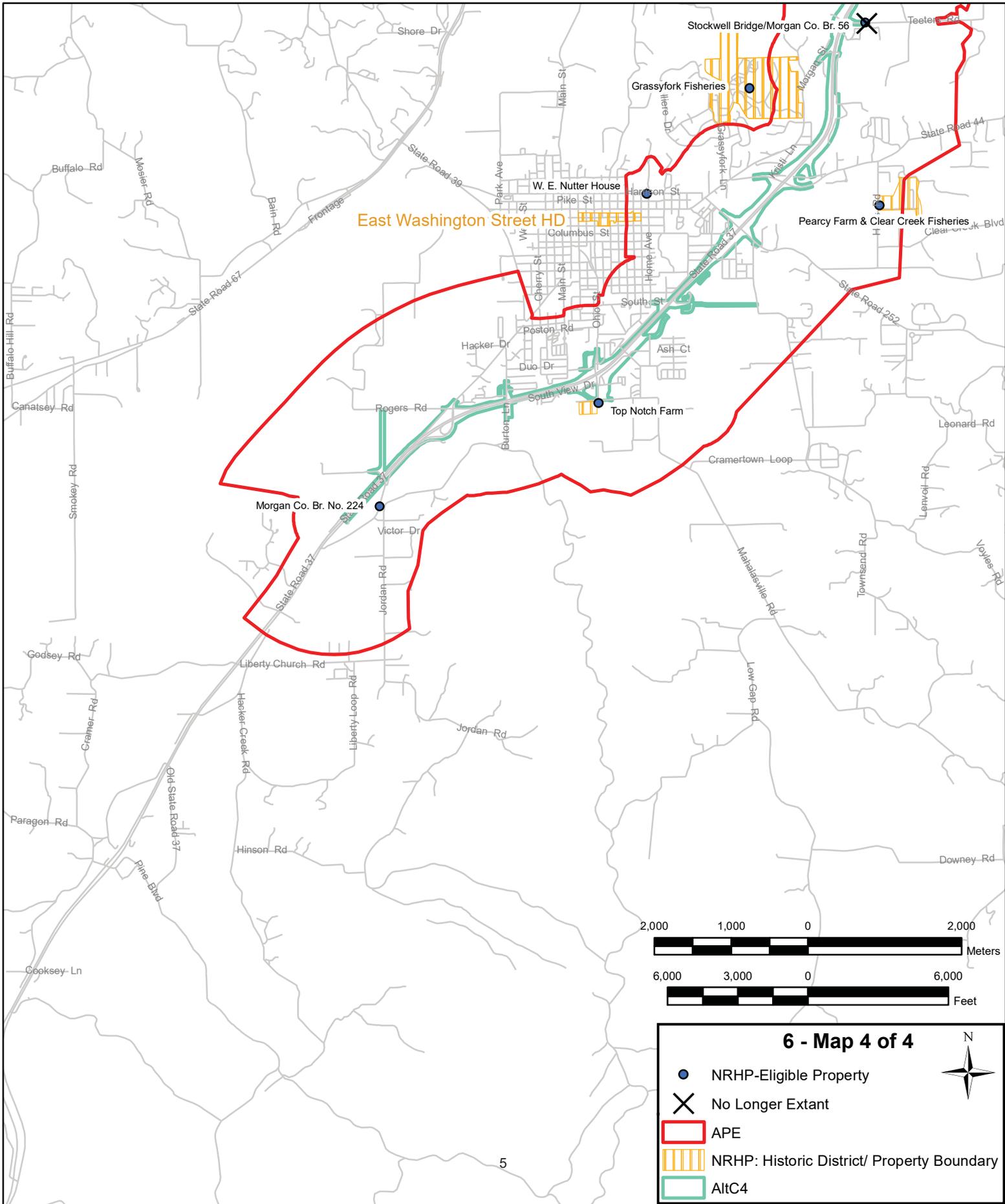


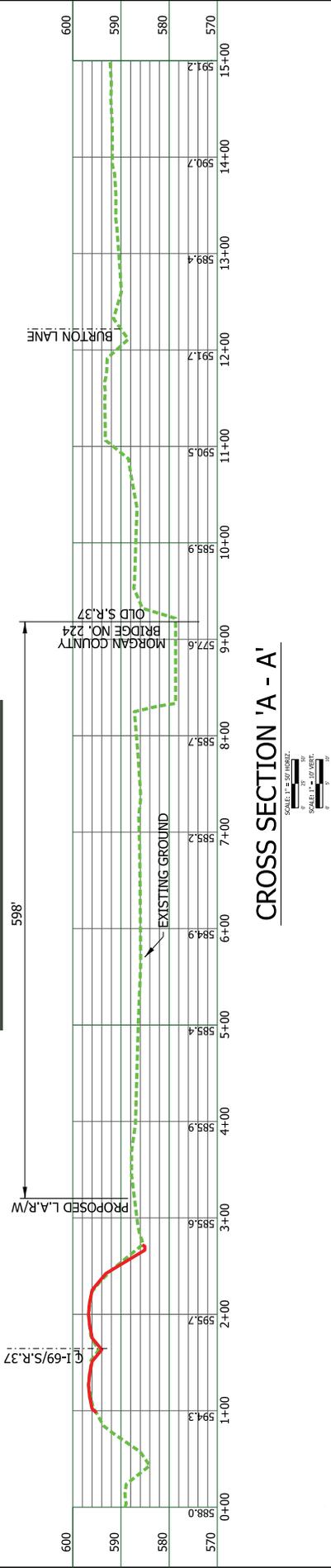
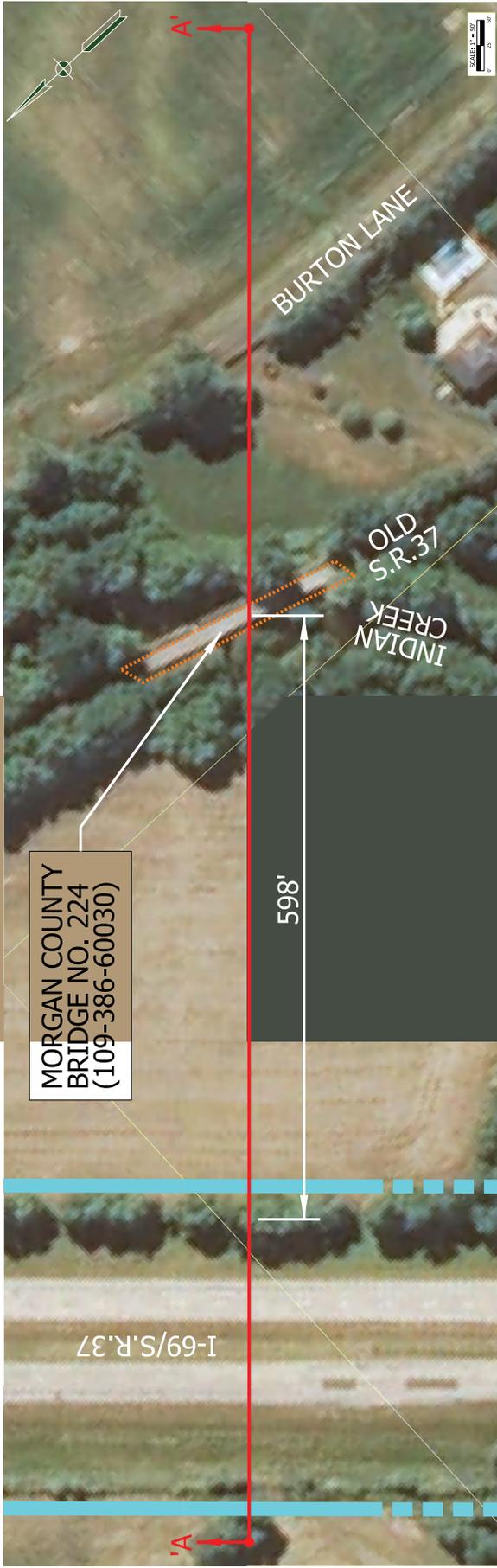


**- Map 3 of 4**

- NRHP-Eligible Property
- ✕ No Longer Extant
- APE
- NRHP: Historic District/ Property Boundary
- AltC4



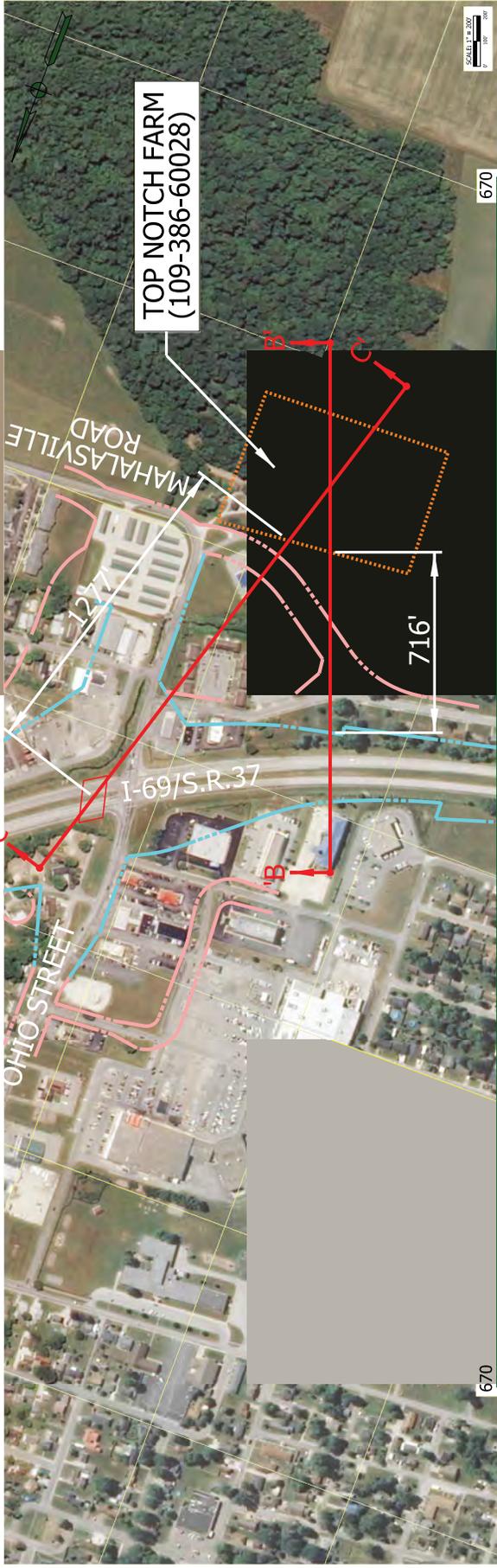




**CROSS SECTION 'A - A'**

<p>I-69 EVANSVILLE TO INDIANAPOLIS STUDY SECTION 6 (FROM S.R.39 TO I-465)</p>	
<p>PLAN VIEW ALTERNATIVE C4 ALIGNMENT AND RESOURCE LOCATION PLANS</p>	

	SECTION REFERENCE		EXISTING GROUND
	PROPOSED L.A./R.W.		PROPOSED IMPROVEMENT
	PROPOSED R/W		LINE OF SITE
	HISTORIC PROPERTY		



670  
660  
650  
640  
630  
620  
610  
600  
590  
580  
570

**CROSS SECTION 'B - B'**



640  
630  
620  
610  
600  
590  
580

**CROSS SECTION 'C - C'**



SCALE: 1" = 100' HORIZ.  
SCALE: 1" = 20' VERT.

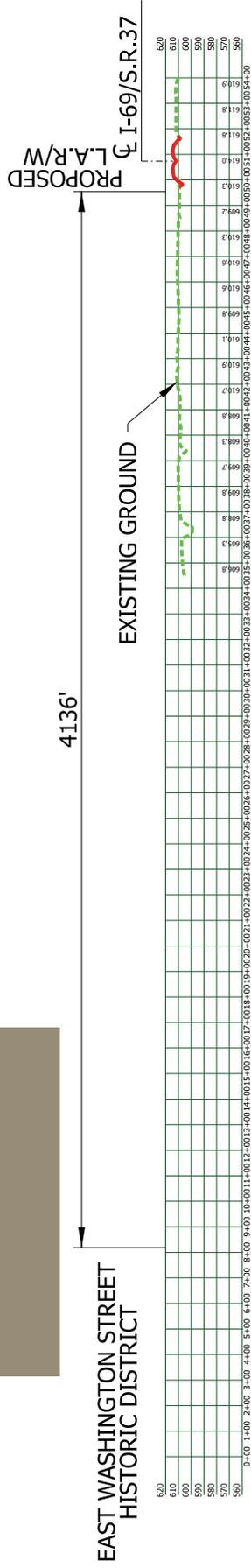
I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

SECTION REFERENCE  
PROPOSED L.A./R.W.  
PROPOSED R/W  
HISTORIC PROPERTY

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



**EAST WASHINGTON STREET  
HISTORIC DISTRICT  
(NR-1313)**



**SECTION 'D - D'**

SCALE: H = 1" = 100' HORIZ.  
SCALE: V = 1" = 40' VERT.

- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED I.A./R/W
  - PROPOSED IMPROVEMENT
  - LINE OF SITE
  - HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R. 39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS

W.E. NUTTER HOUSE  
(109-386-64053)

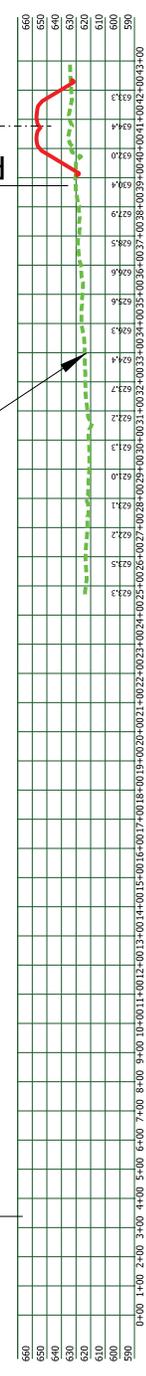


W.E. NUTTER HOUSE

3533'

EXISTING GROUND

PROPOSED L.A.R/W  
I-69/S.R.37



SECTION 'E - E'

SCALE: 1" = 200' HORIZ.  
1" = 20' VERT.  
SCALE: 1" = 40' HORIZ.  
1" = 2' VERT.

- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED IMPROVEMENT
  - PROPOSED L.A.R/W
  - PROPOSED R/W
  - LINE OF SITE
  - HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



PEARCY FARM AND  
CLEAR CREEK FISHERIES  
(109-386-60015)

CIKANA FISH  
HATCHERY  
SOUTH

TWIN BRANCH  
ROAD CONNECTOR

HESS RD.  
S.R.44  
3231'

MORGAN ST.

GRASSYFORKS  
FISHERIES

SHERMAN BLVD.

I-69/S.R.37

<p>I-69 EVANSVILLE TO INDIANAPOLIS STUDY SECTION 6 (FROM S.R.39 TO I-465)</p>	
<p>PLAN VIEW ALTERNATIVE C4 ALIGNMENT AND RESOURCE LOCATION PLANS</p>	
<p><b>LEGEND</b></p> <ul style="list-style-type: none"> <li> SECTION REFERENCE</li> <li> EXISTING GROUND</li> <li> PROPOSED I.A. R/W</li> <li> PROPOSED R/W</li> <li> LINE OF SITE</li> <li> HISTORIC PROPERTY</li> </ul>	



1282'

GRASSYFORKS FISHERIES

EXISTING GROUND

PROPOSED L.A.R.W. CL-1-69/S.R.37



SECTION 'F-F'

SCALE: 1" = 200' HORIZ.  
SCALE: 1" = 40' VERT.

- SECTION REFERENCE
- EXISTING GROUND
- PROPOSED L.A.R.W.
- PROPOSED R/W
- LINE OF SITE
- HISTORIC PROPERTY
- PROPOSED IMPROVEMENT

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS

REUBEN ALDRICH FARM  
(109-428-30009)

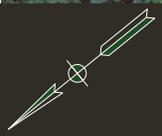
OLD S.R.37

1702'

REUBEN DRIVE

I-69/S.R.37

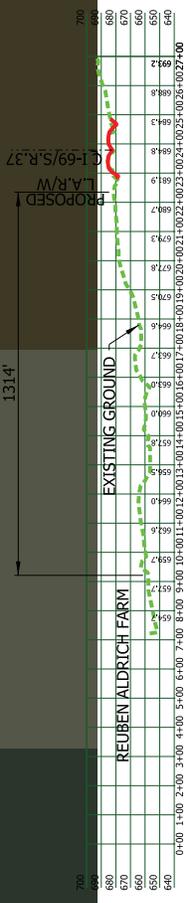
BIG BEND ROAD



G  
H

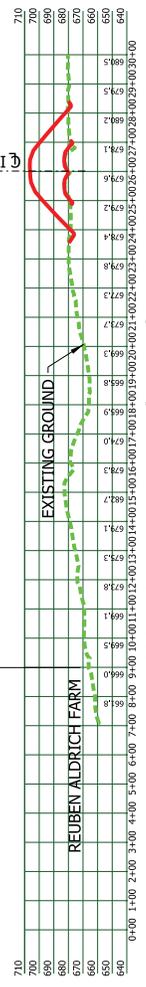
1314'

1314'



CROSS SECTION 'G - G'

1702'

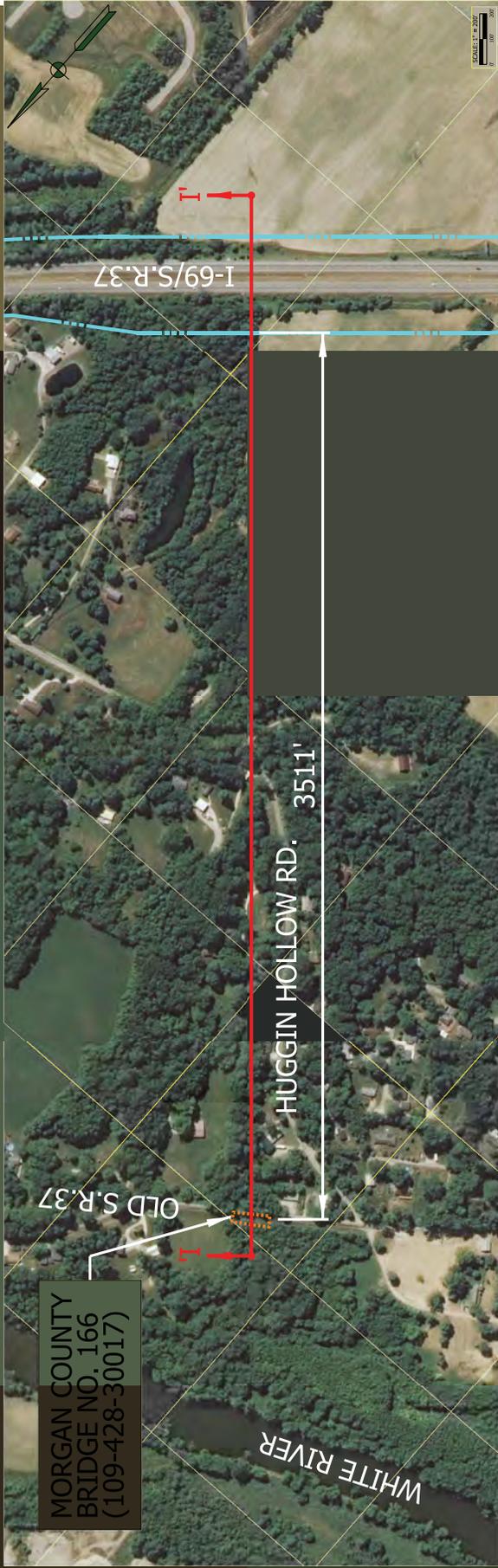


CROSS SECTION 'H - H'

- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED IMPROVEMENT
  - PROPOSED L.A./R.W.
  - PROPOSED R/W
  - LINE OF SITE
  - HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



MORGAN COUNTY  
BRIDGE NO. 166  
(109-428-30017)

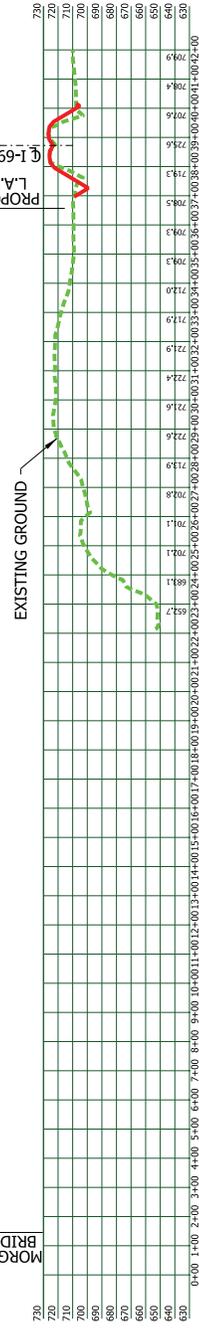
OLD S.R.37

HUGGIN HOLLOW RD. 3511'

MORGAN COUNTY  
BRIDGE NO. 166

3511'

PROPOSED  
L.A./R/W  
I-69/S.R.37



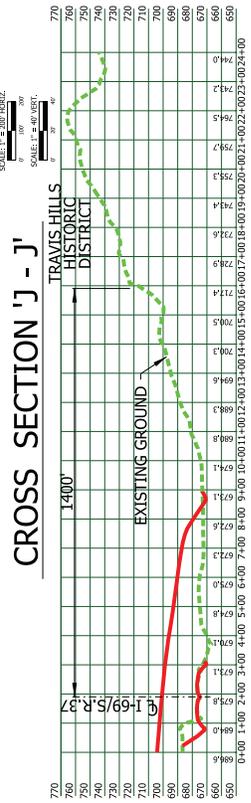
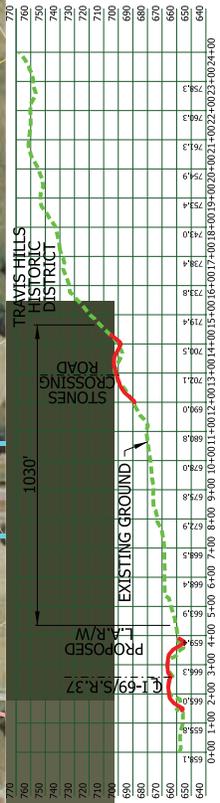
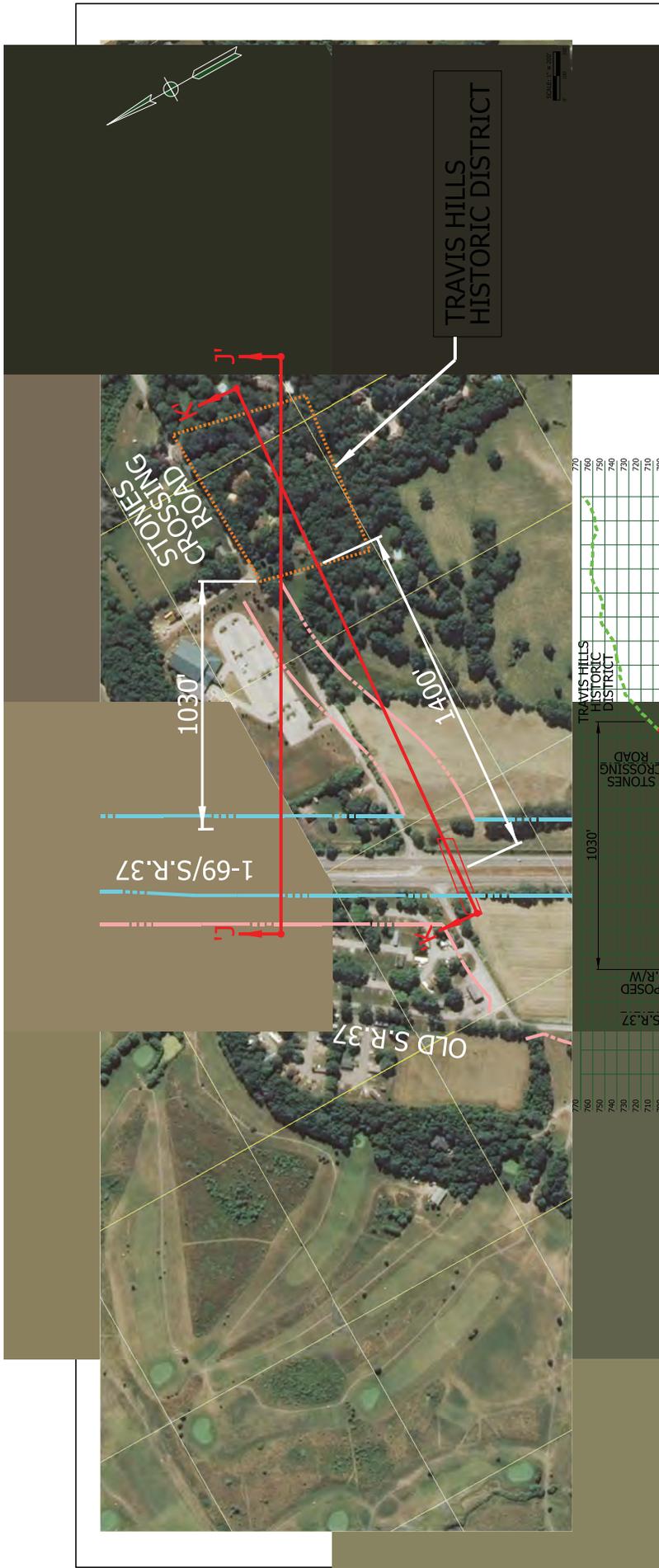
### CROSS SECTION 'I - I'

SCALE: H = 200' HORIZ.  
SCALE: V = 40' VERT.  
0 100 200

- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED L.A./R/W
  - PROPOSED IMPROVEMENT
  - PROPOSED R/W
  - LINE OF SITE
  - HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

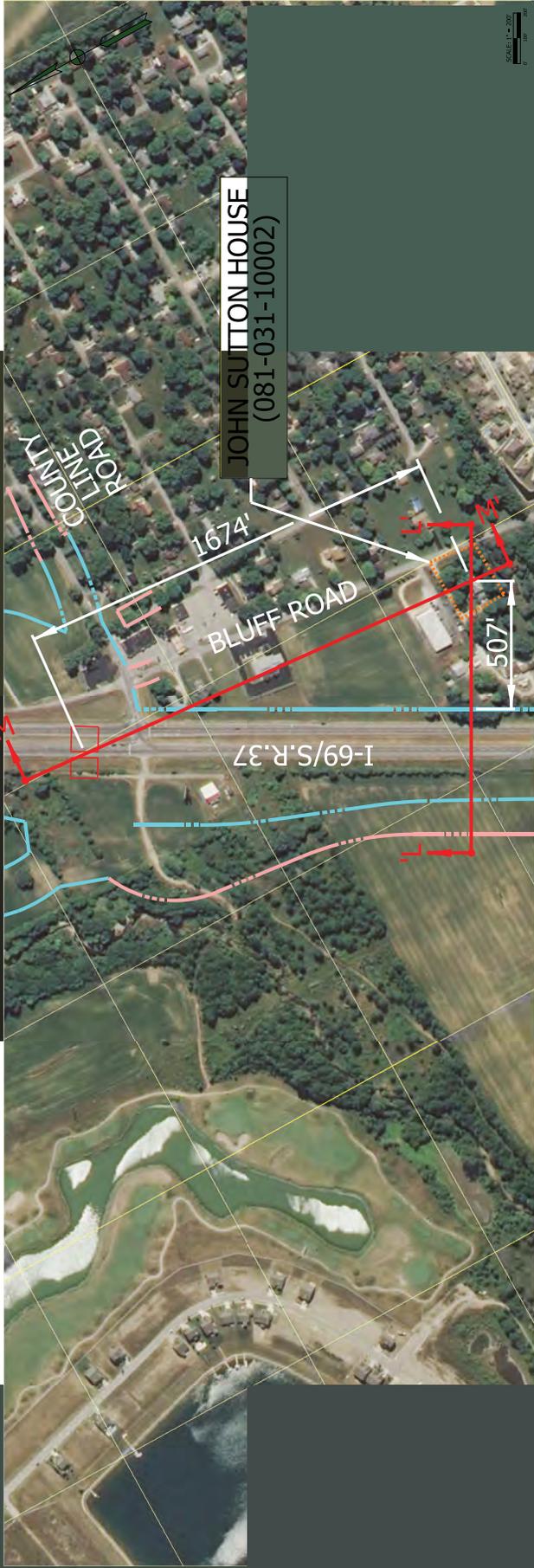
PLAN VIEW ALTERNATIVE C  
ALIGNMENT AND RESOURCE LOCATION PLANS



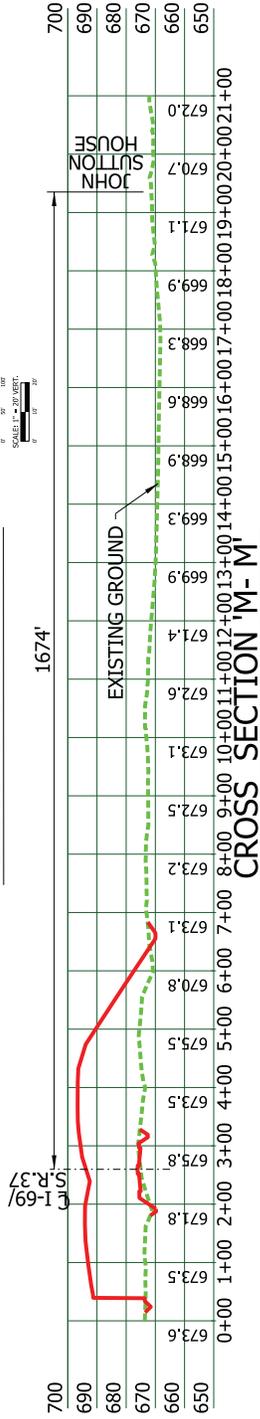
- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED I.A.R/W
  - PROPOSED R/W
  - HISTORIC PROPERTY
  - EXISTING IMPROVEMENT
  - LINE OF SITE

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



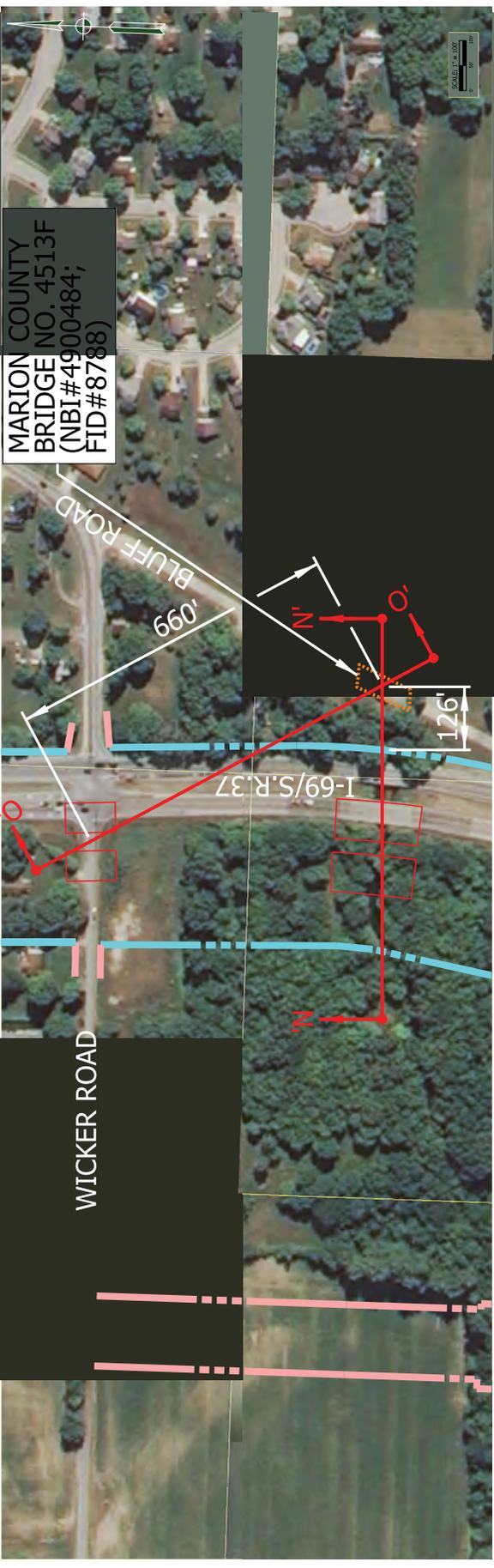
CROSS SECTION 'L - L'



- LEGEND
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED IMPROVEMENT
  - PROPOSED L.A. R/W
  - PROPOSED R/W
  - LINE OF SITE
  - HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS

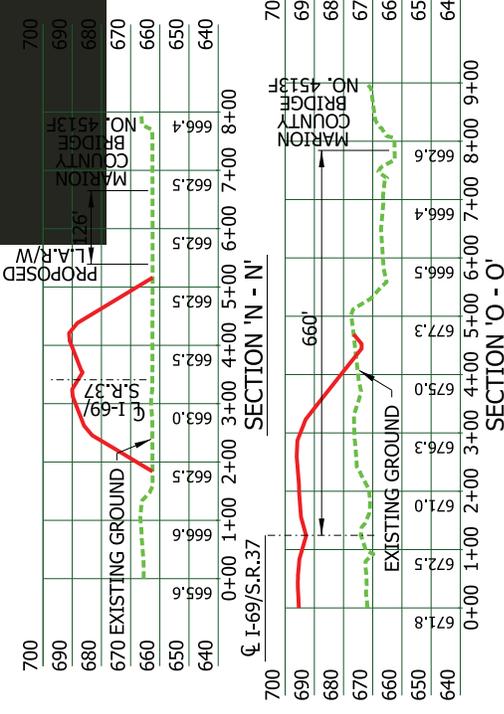


MARION COUNTY  
BRIDGE NO. 4513F  
(NBI#4900484;  
FID#8788)

BLUFF ROAD

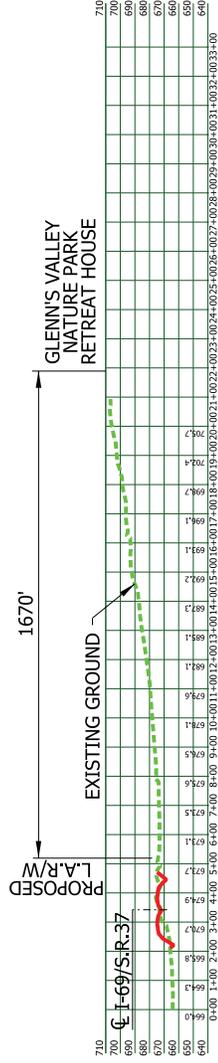
WICKER ROAD

I-69/S.R.37



I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



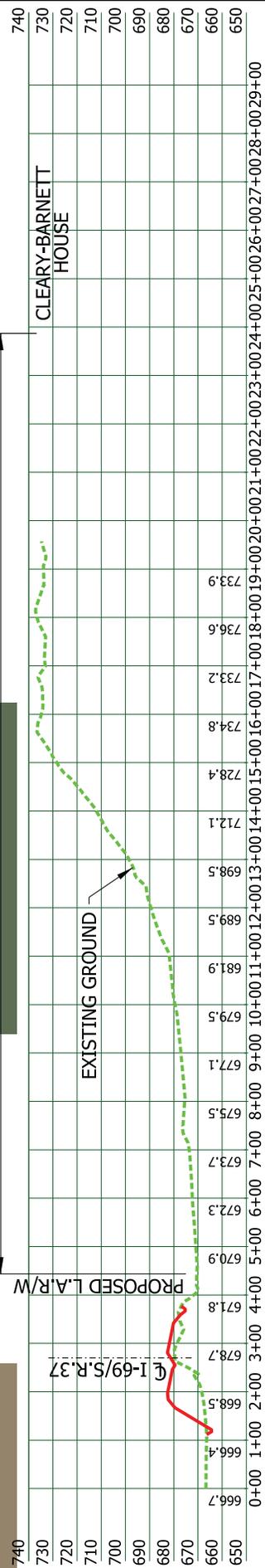
SECTION 'P - P'

SCALE: AS SHOWN  
SCALE: 1" = 20' HORIZ.  
SCALE: 1" = 2' VERT.

- LEGEND**
- SECTION REFERENCE
  - PROPOSED L.A./R/W
  - PROPOSED R/W
  - HISTORIC PROPERTY
  - EXISTING GROUND
  - PROPOSED IMPROVEMENT
  - LINE OF SITE

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



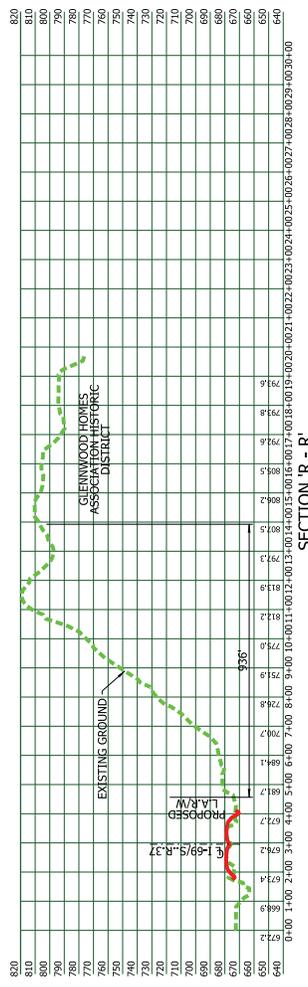
SECTION 'Q - Q'



- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED L.A./R/W
  - PROPOSED IMPROVEMENT
  - PROPOSED R/W
  - LINE OF SITE
  - HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS

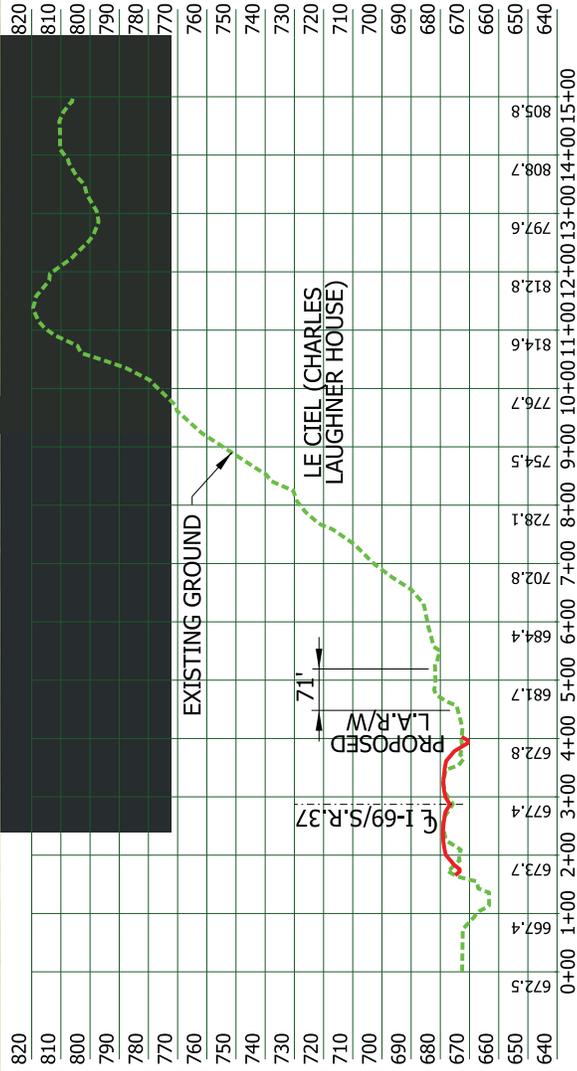
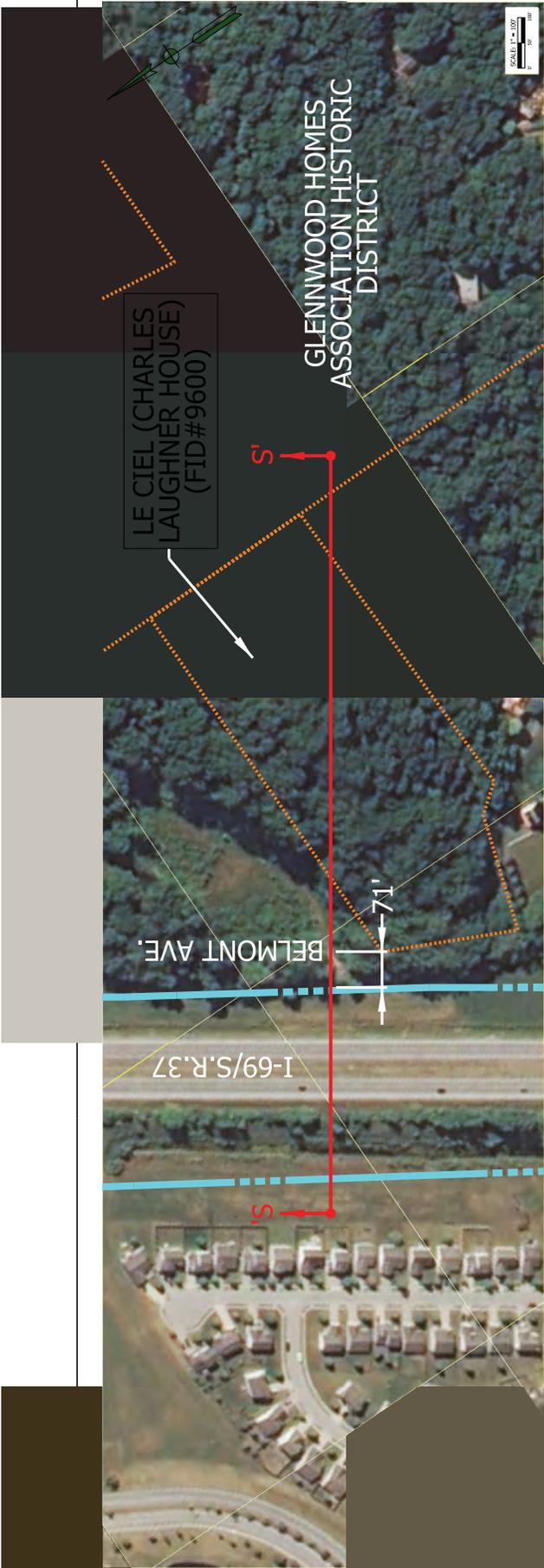


**LEGEND**

- SECTION REFERENCE
- EXISTING GROUND
- PROPOSED IMPROVEMENT
- PROPOSED R/W
- PROPOSED R/W
- HISTORIC PROPERTY

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS



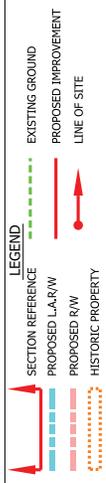
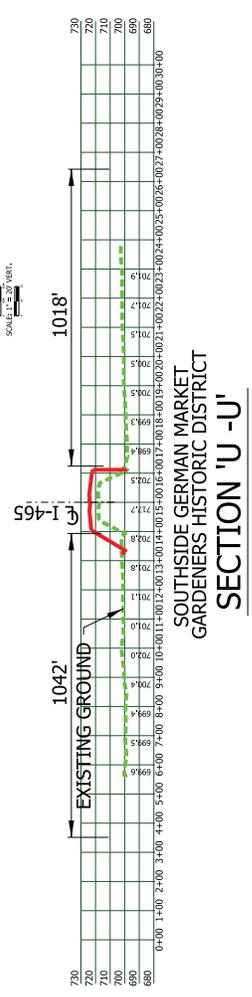
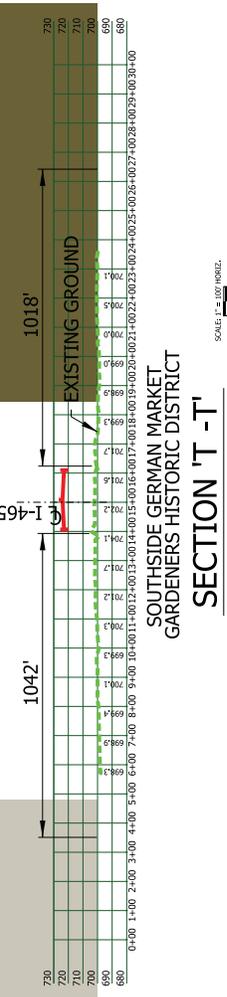
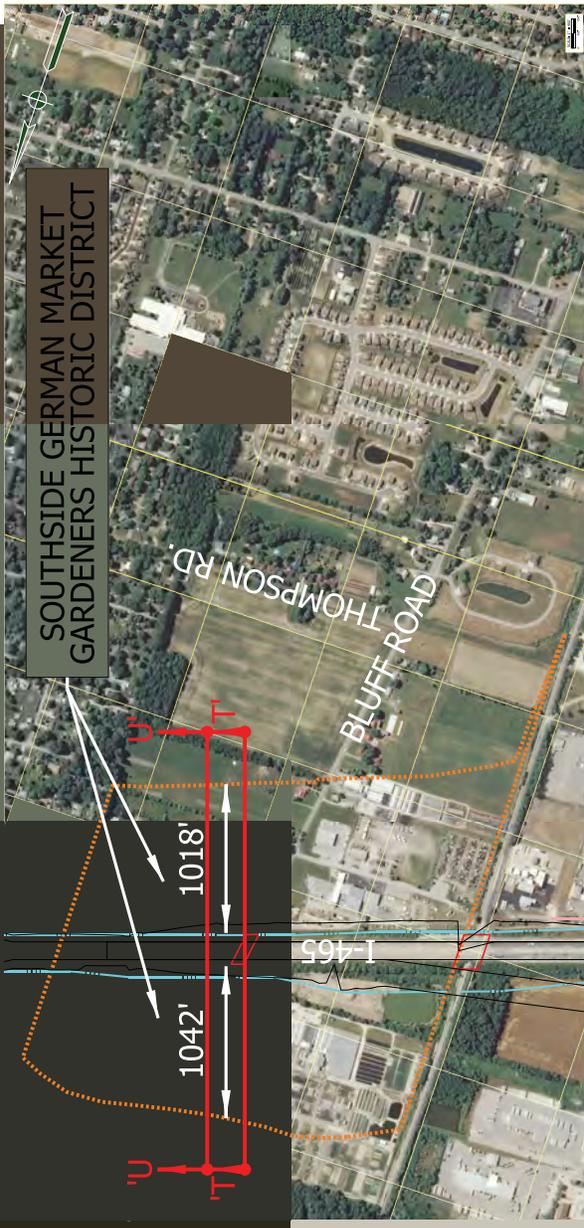
**SECTION 'S - S'**

SCALE: 1" = 100'  
SCALE: 1" = 200'

I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS

- LEGEND**
- SECTION REFERENCE
  - EXISTING GROUND
  - PROPOSED IMPROVEMENT
  - PROPOSED L.A.R/W
  - PROPOSED R/W
  - LINE OF SITE
  - HISTORIC PROPERTY



I-69 EVANSVILLE TO INDIANAPOLIS STUDY  
SECTION 6 (FROM S.R.39 TO I-465)

PLAN VIEW ALTERNATIVE C4  
ALIGNMENT AND RESOURCE LOCATION PLANS

# **APPENDIX M-2**

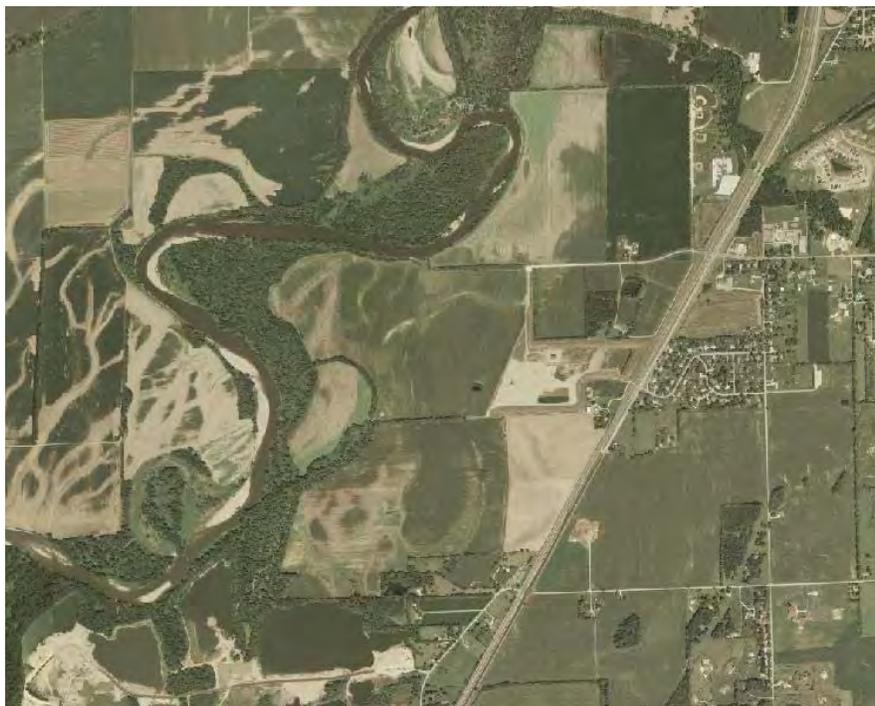
## **Report Summaries**

**I-69 CORRIDOR TIER 2 STUDIES**  
**Evansville to Indianapolis**  
*DRAFT Phase Ia Literature Review*  
*Section 6, SR39 to I-465 at Indianapolis*  
*Marion, Johnson, Morgan Counties*

July 31, 2006

*Prepared By*

University of Kentucky  
Program of Archaeological Research  
1020A Export St.  
Lexington, KY 40506



*Prepared for*  
Federal Highway Administration and  
Indiana Department of Transportation



**I-69 CORRIDOR TIER 2 STUDIES**  
**Evansville to Indianapolis**  
*Phase Ia Archaeological Investigations*  
*Section 6, SR39 to I-465 at Indianapolis*  
*Marion, Johnson, Morgan Counties*

July 31, 2006

*By*

Tanya M. Peres, Ph.D., Patrick D. Trader, Scott Jones,  
Eric Schlarb, and Andrew Madsen

*Prepared By*

University of Kentucky  
Program of Archaeological Research  
1020A Export St.  
Lexington, KY 40506



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**Patrick D. Trader, MA**  
*Principal Investigator*

*Prepared for:*

Federal Highway Administration and  
Indiana Department of Transportation

## Abstract

On behalf of HNTB, Inc., the University of Kentucky's Program for Archaeological Research (UKPAR) conducted a Phase Ia literature review and records check for I-69 Section 6. The Phase Ia study was conducted in compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800, as part of the Tier 2 environmental impact analysis for the project. The purpose of the Phase Ia literature review was to examine data pertaining to previously recorded archaeological sites and the extant documentary and cartographic sources pertaining to the study corridor. The information reviewed here will facilitate the design and completion of a Phase Ia archaeological survey of the I-69 Section 6 study corridor.

The Section 6 study corridor follows the existing SR 37 alignment from SR39 in Martinsville to I-465 at Indianapolis. Improvements will be made along SR 37 to bring it up to interstate standards. In Marion County the Section 6 alignment leaves existing SR 37 north of Edgewood Avenue for the proposed interchange connection to I-465, which would be just west of the present SR 37 interchange.

New or upgraded Morgan County interchanges are being considered at SR 39, Ohio Street, SR252, Egbert Road, Henderson Ford and SR 144. Other proposed interchanges in Johnson and Marion counties are being considered at Smith Valley Road, County Line Road, Southport Road and I-465.

Background research involved sites files and archival research at the Indiana Division of Historic Preservation and Archaeology. Research was also conducted at Indiana State Archives, Indiana Historical Society, and research facilities at Ball State University and Indiana University. Archaeological site data and historical background were collected to prepare a cultural overview and historical context for the Section 6 study area.

Twenty-nine previously identified sites are located within the I-69 Section 6 study corridor. Of these, 27 are prehistoric, one is historic, and one has both prehistoric and historic components. Of the 28 sites with prehistoric components, 17 have unidentified components. Of the remaining 11 prehistoric sites, six are single components, while the remaining five have multiple components. Prehistoric components identified include one Paleoindian component, two Early Archaic components, one Middle Archaic components, six Late Archaic components, two with unspecified Archaic components, three Early Woodland components, two Middle Woodland components, one undefined Woodland component, and one Late Prehistoric, Oliver Phase component. In addition, the historic site dates from the late nineteenth through early twentieth century.

To assess the likelihood that unrecorded prehistoric and historic archaeological sites could be present in the study corridor, locational data on recorded prehistoric and historic sites outside the study corridor within a 1-mile radius of the project study corridor were also researched. These data have been incorporated into the cultural overview section.

**I-69 CORRIDOR TIER 2 STUDIES**  
**Evansville to Indianapolis**  
*Historic Property Report*  
*Section 6, SR 39 to I-465*

June 23, 2008



*Prepared for*

Federal Highway Administration and  
Indiana Department of Transportation





### **Executive Summary**

This Historic Property Report documents the methodology and findings of eligibility as part of the Section 106 process for I-69 Section 6 Tier 2 Study. Historic properties were identified and evaluated in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966, as amended, and CFR Part 800 (Revised January 2001), Final Rule on Revision of Current Regulations dated December 12, 2000 and incorporating amendments effective August 5, 2004.

Project historians identified and evaluated historic properties in consultation with the Indiana State Historic Preservation Officer (SHPO) and the consulting parties for this project.

The project historians performed a field survey and documentary research to complete the above-ground resources survey for Section 6. They documented 113 above-ground resources located within the Area of Potential Effects (APE). Of these, sixty-four above-ground resources were not previously identified in county surveys for Morgan, Johnson, and Marion counties. The remaining forty-nine properties were previously identified in surveys for these counties.

The present survey found that ten previously identified resources have been demolished (Morgan 60020, 60029, 64105, 64197, 35006, 35007, 30010; and Marion 85409, 85411, 85415). Eleven previously identified properties were found to be extensively altered since the county survey was conducted and were not included in the present survey (Morgan 60021, 60031, 64006, 64007, 64043, 64044, 64050, 64055, 64061, 64196, 64199). Seven properties that were previously surveyed individually are now listed in the NRHP as part of the East Washington Street Historic District, and were not surveyed individually as part of the present survey (Morgan 64096, 64099, 64100, 64101, 64106, 64107, 64108).

One property that was previously identified in the county survey for Marion County (Marion 85311) was identified as potentially eligible in the Tier 1 Study. This property was inventoried as part of the present survey, but was later demolished. It is included in this report as one of the 113 properties surveyed.

## **I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES**



### **Historic Property Report, Section 6**

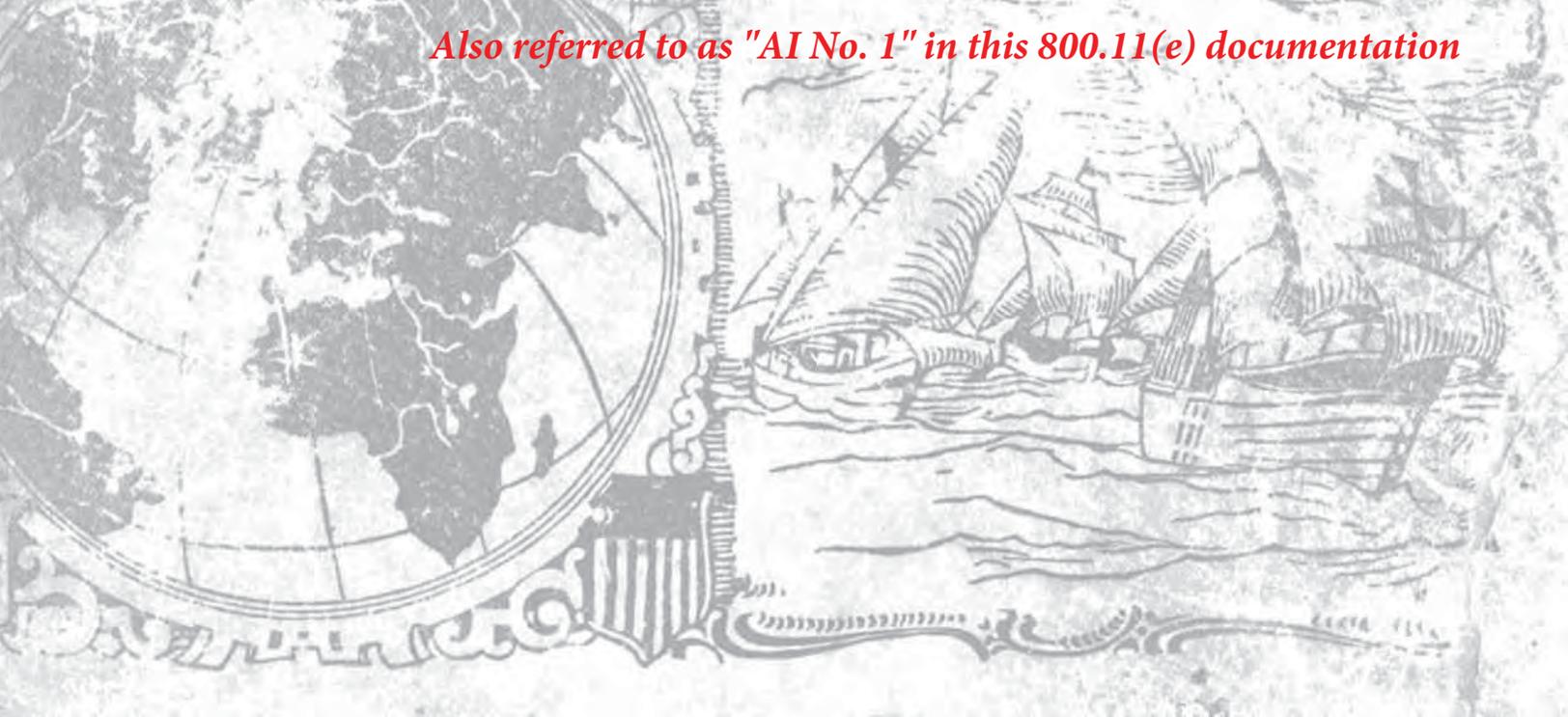
There are no properties listed in the Indiana Register of Historic Sites and Structures that are not also listed in the NRHP.

There is one property listed in the National Register of Historic Places (NRHP) in the APE for Section 6.

- *East Washington Street Historic District (Martinsville, Morgan County)*

As a result of identification and evaluation efforts for this project, seven individual historic properties and no districts are being recommended as eligible for listing in the NRHP:

- *Morgan County Bridge No. 224 (Morgan 60030)*
- *Top Notch Farm (Morgan 60028)*
- *W.E. Nutter House (Morgan 64053)*
- *Grassyfork Fisheries (Morgan 60012)*
- *Stockwell Bridge (Morgan 60053)*
- *Morgan County Bridge No. 166 (Morgan 30017)*
- *John Sutton House (Johnson 10002)*



## **Historic Property Report Additional Information**

**I-69 Evansville to Indianapolis: Tier 2 Studies | Section 6**

**State Road 37 Alternatives**

**DES No.: 0300382; DHPA No.: 4615**

**Morgan, Johnson, and Marion Counties, Indiana**

Prepared for  
**Federal Highway Administration/Indiana Department of Transportation**

Prepared by  
**WEINTRAUT & ASSOCIATES, INC.**  
Principal Investigator: Dr. Linda Weintraut  
Principal Authors: Bethany Natali, William Selm, and Linda Weintraut  
With contributions from: Craig Arnold, Jason Goldbach, and Bethany Hughes

PO Box 5034  
Zionsville, Indiana  
(317) 733-9770  
(Linda@weintrautinc.com)

**September 2, 2015**

## Executive Summary

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This federally-funded undertaking is the construction of Section 6 of Interstate 69 (I-69) Evansville to Indianapolis. This Additional Information (AI) Report is for the alternatives along the State Road (SR) 37 corridor and covers a distance of approximately twenty-six miles through Morgan, Johnson, and Marion counties in southwestern Indiana. The I-69 Evansville to Indianapolis project, which is approximately 142 miles in length, is a component of the congressionally designated national I-69 corridor extending more than 2,100 miles from the Canadian border to the Mexican border.

Section 6 begins at SR 37, south of SR 39 in Martinsville, Indiana. Other alternatives are being studied in Section 6, but this AI report discusses the efforts to identify historic properties for those alternatives centering on and continuing in a northerly direction along current SR 37 to I-465 in Indianapolis, Indiana, for a distance of approximately twenty-six miles. This report provides additional information to the Historic Property Report (HPR) for the I-69 Section 6 Tier 2 Report (Thayer 2008). In 2004 and 2005, Indiana Department of Transportation (INDOT) Consultant Laura Thayer conducted a survey to identify and evaluate properties more than fifty years of age within the Area of Potential Effects (APE).

In 2015, INDOT initiated an additional information study to update the identification and evaluation efforts for Section 6. In Spring 2015, Weintraut & Associates (W&A) conducted and updated the survey from 2004/2005 by reviewing the status of properties identified as Contributing in that survey and surveying properties constructed between 1955 and 1972 (projected construction date of 2022). In areas where the APE has been expanded, W&A surveyed properties constructed in, or prior to, 1972.

The APE, surveyed in 2004/2005 and identified in the 2008 HPR, had been drawn to generally include Alternative 3C, the corridor selected at the conclusion of the Tier 1 study as the preferred alternative to be studied in Tier 2. (See Appendix 4: Supporting Documents.) The APE has been further refined in 2015 through consultation with INDOT and the State Historic Preservation Officer (SHPO). In general, the APE for Section 6 is approximately 4,000 feet wide and is centered on the present SR 37. In some areas, the APE was expanded to take into account any potential physical, temporary and long-term visual, atmospheric, or audible impacts or alterations that may affect a property listed or eligible for listing in the National Register of Historic Places (NRHP). (See Appendix 2: Maps.)

Project historians who meet or exceed the Secretary of the Interior’s Standards for Section 106 work identified and evaluated historic properties within the APE for this project. Historic properties were identified and evaluated in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966, as amended, and CFR Part 800 (Revised January 2015), Final Rule on Revision of Current Regulations, December 12, 2000, and incorporating amendments effective August 5, 2004.

As a result of identification and evaluation efforts for the 2004/2005 survey, the following resources were identified as listed or were recommended as eligible for listing in the NRHP in the HPR in 2008:

- East Washington Street Historic District (NR-1313)
- John Sutton House [Indiana Historic Sites and Structures Inventory (IHSSI) No.: 081-031-10002]
- Morgan Co. Br. 166 [IHSSI No.: 109-428-30017; Historic Bridge (HB) No.: 2214 National Bridge Inventory (NBI) No.:5500153]
- Stockwell Bridge/Morgan Co. Br. 56 (IHSSI No.: 109-386-60053; HB No.: 2211; NBI No.: 5500049)

- Grassyfork Fisheries (IHSSI No.: 109-386-60012)
- W.E. Nutter House (IHSSI No.: 109-386-64053)
- Top Notch Farm (IHSSI No.: 109-386-60028)
- Morgan Co. Br. 224 (IHSSI No.: 109-386-60030; HB No. 1253; NBI No.: 5500142).

Since the release of the HPR in 2008, the *Indiana Historic Bridge Inventory* (2009) has identified the following bridges as NRHP-eligible:

- Marion Co. Br. 4513 F (NBI No.: 4900484; Field Identification Number (FID) No.: 8788)
- Morgan Co. Br. 166 (IHSSI No.: 109-428-30017; NBI No.: 5500153)
- Morgan Co. Br. 224 (IHSSI No.: 109-386-60030; NBI No.: 5500153)
- Stockwell Bridge/Morgan Co. Br. 56 (IHSSI No.: 109-386-60053; HB-2211; NBI No.: 5500049)

Further, in 2012, the Grassy Forks Fisheries was listed in the NRHP as Grassyforks Farm No. 1 (NR-2209).

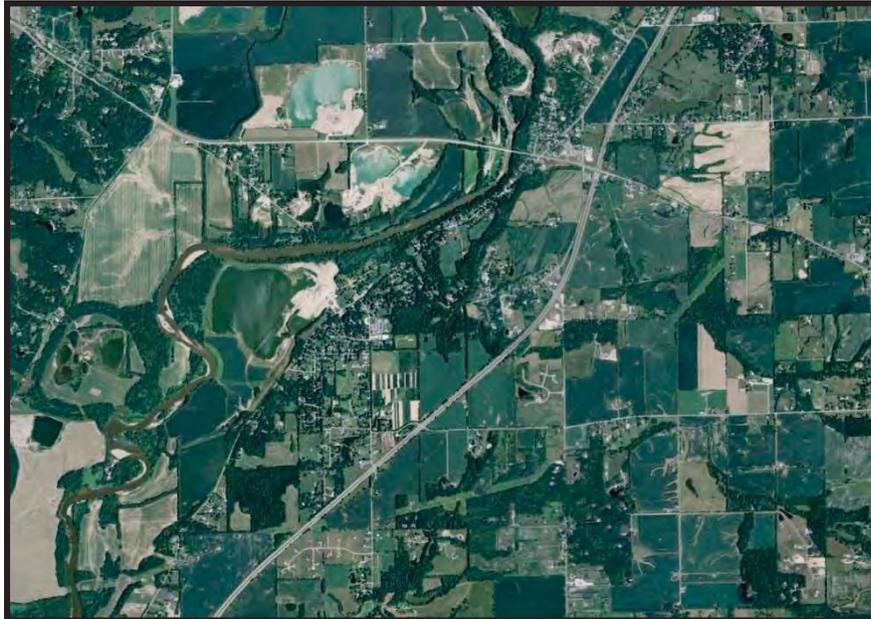
All NRHP-listed or eligible properties identified in the HPR (2008) are in existence; recommendations for those properties made in the HPR remain appropriate.

In addition to those properties surveyed in 2004/2005 and documented in the 2008 HPR, historians for W&A identified a total of 107 individual properties or districts considered Contributing or higher within the APE. Of those, one resource, the Fowler-Mundy Cemetery (FID: 2029) is listed in the Indiana Register of Historic Sites and Structures. In addition, the following are recommended as eligible for listing in the NRHP:

- Southside German Market Gardeners Historic District
- Glennwood Homes Association Historic District
- Travis Hills Historic District
- Le Ciel (Charles Laughner House), 7719 Belmont Avenue (FID No.: 9600 )
- Cleary-Barnett House, 8000 Bluff Road (FID No.: 9569)
- Glenn's Valley Nature Park Retreat House (IHSSI No.: 097-392-85416)
- Reuben Aldrich Farm (IHSSI No.: 109-428-30009)

**I-69 TIER 2 STUDIES**  
**Evansville to Indianapolis**  
*Phase Ia Archaeological Literature Review for Section 6*  
*Preliminary Alternatives in Hendricks, Johnson,*  
*Marion and Morgan Counties*  
*Des. No. 0300382*

November 13, 2015



*Prepared by:*  
Gray & Pape, Inc.  
5807 N. Post Road  
Indianapolis, Indiana 46216

*Prepared for:*  
Federal Highway Administration and  
Indiana Department of Transportation



**Phase Ia Archaeological Literature Review  
Section 6 Preliminary Alternatives in  
Hendricks, Johnson, Marion and Morgan Counties, Indiana  
I-69 Tier 2 Studies  
Evansville to Indianapolis**

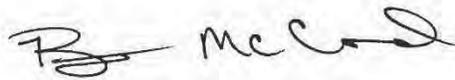
**Lead Agency: FHWA**

**Prepared For:**

**Indiana Department of Transportation  
Indiana Government Center North, N642  
Indianapolis, Indiana 46204**

**Prepared By:**

**Beth K. McCord  
Christopher J. Baltz  
Gray & Pape, Inc.  
5807 N. Post Road  
Indianapolis, Indiana 46216**



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**Beth McCord  
Principal Investigator  
November 13, 2015**



## ABSTRACT

Gray & Pape, Inc., under contract with HNTB, Inc. and Lochmueller Group, conducted an archaeological literature review for the I-69 Section 6 Preliminary Alternatives study area. The literature review was conducted in compliance with Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800, as part of the Tier 2 environmental impact study for the project. The purpose of the literature review was to update previous background research and examine data on previously recorded archaeological sites, documentary sources, and cartographic sources pertaining to the Preliminary Alternatives study area. The information reviewed here will facilitate the alternatives analysis and design of Section 6 corridor.

The Section 6 Preliminary Alternatives study area presented in this document includes the five Preliminary Alternatives (Alternatives B, D, C, K3 and K4) and a 2.41-kilometer (1.5-mile) buffer. The study area encompasses 50,394 hectares (124,527 acres). In general, the Section 6 study area follows the existing SR 37 alignment from just south of the SR 37/SR 39 intersection in Martinsville and either continues northward to I-465 at Indianapolis or diverges west around SR 144 to terminate at I-70 or to terminate at I-465. Portions of Hendricks, Johnson, Marion, and Morgan counties are included in the study area.

Background research identified 496 previously recorded archaeological sites within the Section 6 Preliminary Alternatives study area. Twenty-one of these lie within Hendricks County, 111 in Johnson County, 179 in Marion County, and 185 in Morgan County. The documented sites range from Paleoindian to Historical twentieth century. Several of the sites are multicomponent. The National Register of Historic Places eligibility of 208 sites is unevaluated and 254 sites were determined to be not eligible. Thirteen sites have been reported as destroyed. In total, 21 sites are within the Section 6 Preliminary Alternatives study area that have been recommended as potentially eligible for listing on the National Register of Historic Places.

**I-69 TIER 2 STUDIES**  
**Evansville to Indianapolis**  
*Phase Ia Archaeological Survey 1 for Section 6,  
Indian Creek South of Martinsville to Teeters Road,  
Morgan County, Des. No. 0300382*

February 29, 2016



*Prepared by:*

**Gray & Pape, Inc.**

**5807 N. Post Road**

**Indianapolis, Indiana 46216**

*Prepared for:*

**Federal Highway Administration and  
Indiana Department of Transportation**



**Phase Ia Archaeological Survey 1 for Section 6,  
Indian Creek South of Martinsville to Teeters Road,  
Morgan County, Indiana  
I-69 Tier 2 Studies  
Evansville to Indianapolis**

Lead Agency: FHWA

Prepared for:

Indiana Department of Transportation  
Indiana Government Center North, N642  
Indianapolis, Indiana 46204

Prepared by:

Beth K. McCord

Christopher J. Baltz

Gray & Pape, Inc.

5807 N. Post Road

Indianapolis, Indiana 46216



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Beth McCord

Principal Investigator

February 29, 2016



## Abstract

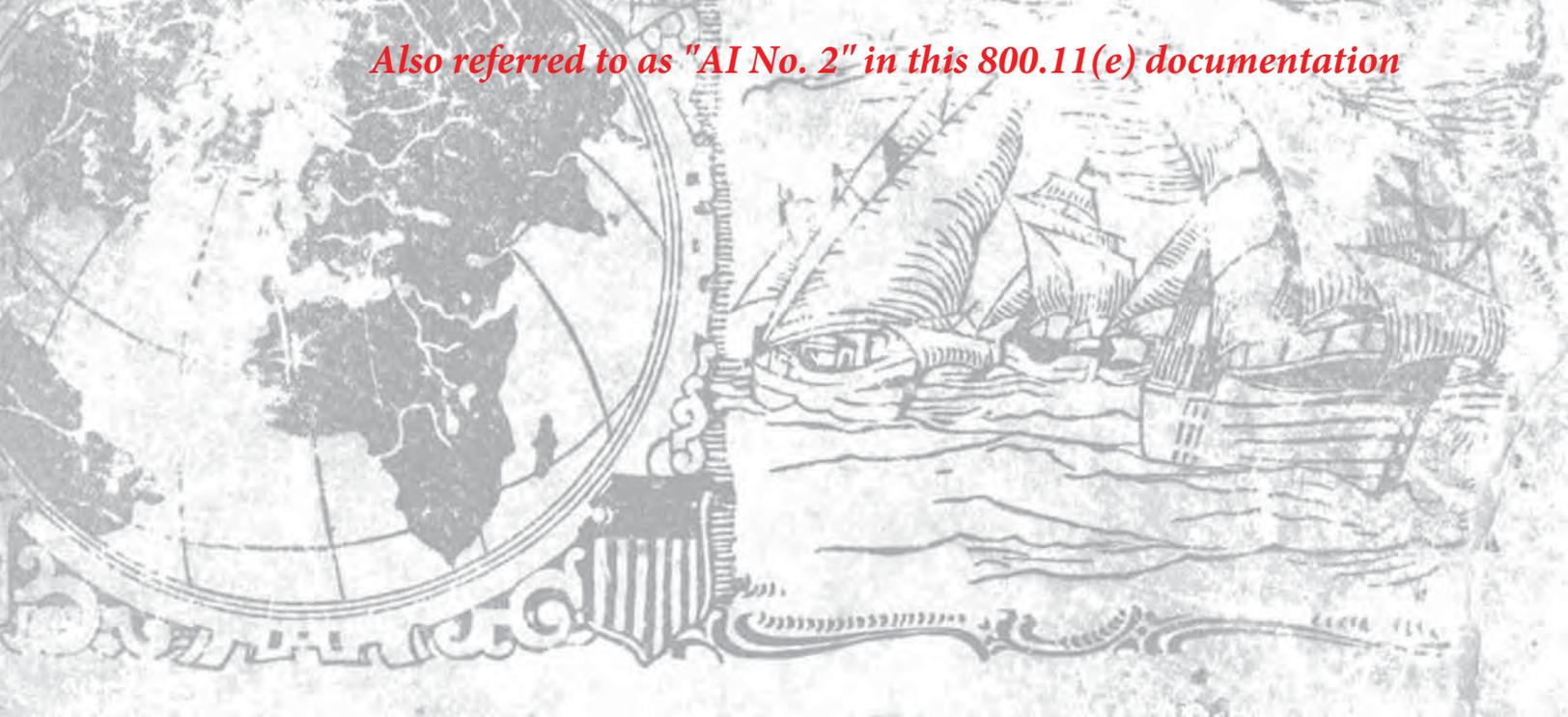
Gray & Pape, Inc., under contract with HNTB, Inc., conducted a Phase Ia archaeological survey for the southern portion of the I-69 Section 6 corridor. The project is in compliance with Section 106 of the National Historic Preservation Act, as amended. The goal of the investigation was to determine if archaeological resources are present within the proposed Section 6 corridor, and to determine if such resources might be eligible for inclusion in the National Register of Historic Places.

The southern portion of the Section 6 project area presented in this report extends from the end of Section 5 near Indian Creek at the south end to Teeters Road at the north end, a distance of 10.10 kilometers (6.28 miles). The study area encompasses 202.4 hectares (500.2 acres). In this portion of the Section 6 corridor, it follows the existing SR 37 alignment for its length. The entire project area lies within Morgan County.

Seven previously undocumented archaeological sites (12Mg551 to 12Mg555, 12Mg557 and 12Mg558) were recorded within the survey area. These include one prehistoric lithic scatter (Site 12Mg552), three prehistoric isolated find sites (12Mg554, 12Mg557, and 12Mg558), one historical artifact scatter (12Mg551), one historical house site (12Mg555), and a historical and prehistoric artifact scatter (12Mg553). All of these sites are recommended as not eligible for the National Register of Historic Places, and no further work is recommended. An eighth site, 12Mg556, represents an old school. It lies immediately adjacent to the northern end of the survey area, within a location that likely will fall within the next portion of work for Section 6. This site was not evaluated relative to eligibility for inclusion in the National Register of Historic Places, as additional archaeological and archival work is necessary to assess its eligibility.

The topographic setting and soils encountered in most of the project area were not found to be conducive for the identification of intact buried cultural resources. One area (Segment 2, Field 1), located south of Martinsville in the White River valley, is located within an expanse of Genesee silt loam. This setting has a high potential for buried cultural deposits and it is recommended for Phase Ic investigation.

*Also referred to as "AI No. 2" in this 800.11(e) documentation*



**Additional Information Memorandum--No. 2  
I-69 Evansville to Indianapolis: Tier 2 Studies  
Section 6  
State Road 37 Alternatives**

DES No.: 0300382; DHPA No.: 4615  
Morgan, Johnson, and Marion Counties, Indiana

Prepared for  
**Federal Highway Administration/Indiana Department of Transportation**

Prepared by  
**WEINTRAUT & ASSOCIATES, INC.**

Principal Investigator: Dr. Linda Weintraut

Principal Author: Bethany Natali

PO Box 5034 | Zionsville, Indiana | (317) 733-9770 | (Linda@weintrautinc.com)

June 2016

# Executive Summary: I-69 Evansville to Indianapolis: Tier 2 Studies, Section 6 | DES No.: 0300382; DHPA No.: 4615 | Morgan, Johnson, and Marion Counties

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This federally-funded undertaking is the construction of Section 6 of Interstate 69 (I-69) Evansville to Indianapolis. This Additional Information (AI) Memorandum — No. 2 describes changes to the Area of Potential Effects (APE) that have occurred since the publication of the AI Historic Property Report (HPR) for the State Road (SR) 37 Alternatives (September 2, 2015) and identifies and evaluates historic properties within that new APE in accordance with Section 106 of the National Historic Preservation Act (1966).

The APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking” [36 § CFR 800.16(d)].

In 2016, the APE was expanded to account for impacts that might occur as a result of design changes to Alternatives C1, C2, and C3. The 2016 APE modifications take into account interchanges, overpasses, and changes to the project footprint not previously shown on plans for the three alternatives, especially in those areas where design plans extend beyond

the boundary of the SR 37 Alternatives APE (2015), or where the proposed new right-of-way is closer than 1,000 feet to the outer edge of the SR 37 Alternatives APE (2015), or where the potential detour route for local traffic would occur outside the SR 37 Alternatives APE. This is consistent with the methodology utilized in all of the Tier 2 Studies for I-69.

Project personnel for Weintraut & Associates, Inc. (W&A), who meet the Secretary of the Interior’s Professional Standards and who are historians listed as Qualified Professionals by the Indiana Department of Natural Resources (IDNR), Indiana Division of Historic Preservation & Archaeology (DHPA), identified and evaluated historic properties within the APE for this project in accordance with Section 106 of the National Historic Preservation Act (1966), as amended and the regulations implementing Section 106 (36 C.F.R. Part 800).

Historians identified fifty-seven resources considered or rated Contributing or higher in the expanded APE, per the rating standards established for the Indiana Historic Sites and Structures Inventory (IHSSI). No properties within the expanded APE have been previously recorded in the National Register of Historic

Places (NRHP). As part of the identification and evaluation efforts for the Section 106 study of this undertaking, historians are recommending one property as eligible for listing in the NRHP: **Pearcy Farm and Clear Creek Fisheries (IHSSI No.: 109-386-60015).**



**Identification of Effects Report  
I-69 Evansville to Indianapolis: Tier 2 Studies  
Section 6  
DES No.: 0300382; DHPA No.: 4615  
Morgan, Johnson, and Marion Counties, Indiana**

Prepared for  
**Federal Highway Administration/Indiana Department of Transportation**

Prepared by  
**WEINTRAUT & ASSOCIATES, INC.**  
Principal Investigator: Dr. Linda Weintraut  
Authors: Bethany Natali, M.A. and Linda Weintraut, Ph.D.  
PO Box 5034 | Zionsville, Indiana | (317) 733-9770 | (Linda@weintrautinc.com)

**August 1, 2016**

# Identification of Effects Report | I-69 Evansville to Indianapolis: Tier 2 Studies, Section 6 | DES No.: 0300382; DHPA No.: 4615 | Executive Summary

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The Indiana Department of Transportation, (INDOT) with funding from the Federal Highway Administration (FHWA), proposes the construction of Section 6 of Interstate 69 (I-69) Evansville to Indianapolis. The I-69 Evansville to Indianapolis project, which is approximately 142 miles in length, is a component of the congressionally designated national I-69 corridor extending more than 2,100 miles from the Canadian border to the Mexican border. This report examines the effects of the alternatives for Section 6 of the I-69 Evansville to Indianapolis Project on historic properties along the State Road (SR) 37 corridor for a distance of approximately twenty-seven miles through Morgan, Johnson, and Marion Counties in central and southwestern Indiana.

Section 6 begins at SR 37, south of SR 39 in Martinsville, Indiana, and terminates along I-465. The project area for the SR 37 alternatives of Section 6 is comprised of rural and urban/suburban environments. Those portions of Martinsville and Indianapolis contained within Section 6 are characterized as being predominately clustered modern suburban residential developments along major roads with retail, commercial, and industrial nodes at major intersections and along SR 37. The area becomes more commercial and industrial near Indianapolis. Rural areas of the SR 37 alterna-

tives for Section 6 are characterized by a scattering of commercial and retail businesses, with a mix of agricultural land occupied by small farms, modern houses and modern residential developments, and forested land.

This Identification of Effects Report documents the methodology and findings of effects as part of the Section 106 process for the Section 6 Tier 2 Study of the I-69 Evansville to Indianapolis Project. All work was conducted in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966, as amended, and 36 CFR Part 800 (Revised January 2016), Final Rule on Revision of Current Regulations dated December 12, 2000, and incorporating amendments effective August 5, 2004.

Sixteen historic properties<sup>1</sup> have been identified within the Area of Potential Effects (APE) for Section 6. Three alternative alignments (C1, C2, and C3) were examined as part of this analysis. Historians are making the following recommendations for the effects of the undertaking on each historic property and for the overall undertaking under each alignment:

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<sup>1</sup> *Note:* The Stockwell Bridge/Morgan Co. Br. 56 (IHSSI No.: 109-386-60053; HB-2211; NBI No.: 5500049) was determined eligible as part of *Statewide Historic Bridge Inventory* and was documented for this project. That bridge was demolished and replaced sometime between March 2015 and March 2016. Therefore, effects to Stockwell Bridge will not be considered or discussed within the body of this report.

**TABLE I. RECOMMENDED EFFECT FINDING**

<b>Historic Property</b>	<b>Alternative C1</b>	<b>Alternative C2</b>	<b>Alternative C3</b>
Morgan Co Br 224 (NBI No. 5500142)	No Adverse Effect	No Adverse Effect	No Adverse Effect
Top Notch Farm	No Adverse Effect	No Adverse Effect	No Adverse Effect
East Washington Street Historic District	No Effect	No Effect	No Effect
W.E. Nutter House	No Effect	No Effect	No Effect
Pearcy Farm and Clear Creek Fisheries	No Effect	No Effect	No Effect
Grassyfork Fisheries Farm No. 1	No Adverse Effect	No Adverse Effect	No Adverse Effect
Reuben Aldrich Farm	Adverse Effect	Adverse Effect	Adverse Effect
Morgan Co. Br. 166 (NBI No. 5500153)	No Effect	No Effect	No Effect
Travis Hill Historic District	No Adverse Effect	No Adverse Effect	No Adverse Effect
John Sutton House	No Adverse Effect	No Adverse Effect	No Adverse Effect
Marion Co Br 4513F (NBI No. 4900484)	No Adverse Effect	No Adverse Effect	No Adverse Effect
Cleary-Barnett House	No Effect	No Effect	No Effect
Glenn's Valley Nature Park Retreat House	No Effect	No Effect	No Effect
Glennwood Homes Association Historic District	No Adverse Effect	No Adverse Effect	No Adverse Effect
Le Ciel (Charles Laughner House)	No Adverse Effect	No Adverse Effect	No Adverse Effect
Southside German Market Gardeners Historic District	Adverse Effect	Adverse Effect	Adverse Effect
<b>Project Finding</b>	<b>Adverse Effect</b>	<b>Adverse Effect</b>	<b>Adverse Effect</b>

## **APPENDIX M-3**

### **SHPO and THPO Coordination**



June 14, 2004

Jon Smith  
State Historic Preservation Office  
402 West Washington Street, W274  
Indianapolis, Indiana

Re: Areas of Potential Effects  
Tier 2: I-69 Evansville to Indianapolis Study: Section 6

Dear Mr. Smith:

Pursuant to Section 106 of the National Historic Preservation Act, Weintraut & Associates Historians, Inc. is conveying the Area of Potential Effects (APE) for Section 6 for the I-69 Evansville to Indianapolis Study.

Per Section II, A, 3 of the Memorandum of Agreement (MOA) for the Tier 1 I-69 Evansville to Indianapolis Study, "In general the range of alternatives considered in a Tier 2 study will be confined to the corridor selected in Tier I." Although the MOA preserved the flexibility to move outside that corridor, for the purposes of this APE, it is assumed that all alternatives will be located within the corridor. In general that corridor is 2,000-foot wide, but it has been narrowed in certain locations. In the event that the range of alternatives is located outside the corridor for either of these sections, a revised APE will be submitted.

In preliminary discussions with the staff of SHPO, it was agreed to begin with each APE being one mile on either side of the corridor and to widen or narrow based on the potential for effect.

Weintraut & Associates has conducted a preliminary field review with Laura Thayer, the sub consultant for this section. Thayer has submitted the enclosed maps and the following justification for narrowing or widening the Area of Potential Effects for Section 6.

Based on a field view of the project area on May 24, 2004 and inspection of 7.5' USGS topographic maps, the APE was defined as follows. Beginning with the preliminary APE with the boundary corresponding to the area 1.0 mi from the 2000-ft wide study corridor, the criteria employed are as follows:

Description:

The APE runs along State Road 37, from 1 mile south of State Road 39 in Morgan County, Indiana, to 1 mile north of I-465 in Marion County, Indiana. The width of the APE varies from a maximum of 2 miles (1 mile on either side of State Road 37) to a minimum of just over 4,000 feet (roughly 2,000 feet on either side of State Road 37). Just south of the city of Martinsville, the APE extends for 1 mile on either side of State Road 37 except in locations where the topography limits the viewshed from State Road 37. Within the city of Martinsville the APE maintains a distance of 1 mile on the east side of State Road 37 while it follows the streets within the city of Martinsville in a zigzag pattern that does not encroach within 2,000 feet of the west side of State Road 37. Specifically, the APE follows State Road 39 to Dickson Street and then zigzags its way to Colfax Street, which it follows until it meets the hill just north of the city. North

of Martinsville, the width of the APE varies with the terrain (yet does not extend further than 1 mile or closer than 2000 feet from State Road 37) and follows roads in areas beyond the view of State Road 37.

The APE maintains a distance of 1 mile on the west side of State Road 37 from the Stone Crossing grade crossing to Banta Road. At Banta Road the APE turns eastward until Concord Street and then turns north and follows Concord to I-465, but excludes the Sunshine Gardens subdivision. On the east side of State Road 37 between Stone Crossing and I-465 the APE follows streets where buildings are assumed to block the viewshed. However, the APE does extend further out than 2,000 feet in locations where there are potential interchanges and grade separations. The terminus of the APE extends 1,000 foot south of I-465 for 1 mile on the east side of State Road 37, but abuts I-465 to the west of State Road 37. On the north side of I-465 the APE follows a 1 mile semi-circle originating from the end point of State Road 37.

Why Created:

This APE was created to show areas, which could potentially be affected by the proposed I-69 highway along section 6 (Martinsville to Indianapolis).

How Created:

For the Tier 2 Section 6 Study, the Draft APE is based on several factors, including location of resources in the Tier 1 Study, as well as the potential for additional resources that were overlooked in earlier inventories, or that have achieved significance since those inventories were completed.

Topography was also considered, both in regards to the impact on cultural resources with the potential to be seen from the new roadway, and in regards to extensive hilly or forested areas that block areas beyond the corridor. Regardless of the presence or absence of known resources, areas were included in the APE if there existed a potential for effect on the physical context caused by factors such as increased traffic, lighting, change in access, increased noise, visibility of the roadway, and alterations of viewsheds.

Within Martinsville and southern Marion County, the APE followed streets where buildings were assumed to be blocking the viewshed; however, the APE did not encroach within 2,000 feet of State Road 37.

The Draft APE will be refined as further fieldwork is conducted. It may be expanded or narrowed as potential impacts are considered along the corridor relating to variables such as season and time of day.

If you have any questions, please feel free to call.

Best regards,

Linda Weintraut, Ph.D.

Cc: Anthony DeSimone, FHWA  
Janice Osadczuk, INDOT  
Thomas Cervone, Ph.D., Bernardin Lochmueller & Associates  
Tim Miller, HNTB  
Laura Thayer  
Mary Crowe, INDOT



RECEIVED JUN 23 2004

Joseph E. Kernan, Governor  
John R. Goss, Director

Indiana Department of Natural Resources

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



June 25, 2004

Linda Weintraut, Ph.D.  
Weintraut & Associates Historians, Inc.  
16 Boone Woods  
Zionsville, Indiana 46077

Federal agency: Federal Highway Administration

Re: Your letter of June 14, 2004; area of potential effects for Section 6 of the Tier 2, I-69 Evansville to Indianapolis Study.

Dear Dr. Weintraut:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470f), and implementing regulations at 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of your June 14, 2004, letter and enclosures, which we received on June 18.

Based on information that you have provided and that otherwise is currently available to us, the proposed area of potential effects ("APE") for Section 6 appears to be appropriate. However, if specific kinds of effects or geographic factors that come to light later in the Section 106 consultation suggest otherwise, it may be appropriate at that time to consider making adjustments to the APE.

You may direct questions about our comments to Karie A. Brudis of my staff at 317-232-1646.

Thank you for your cooperation.

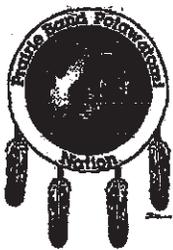
Very truly yours,

Jon C. Smith  
Deputy State Historic Preservation Officer

JCS:KAB:kab

cc: Robert F. Tally, Jr., P.E., Federal Highway Administration, Indiana Division  
Janice Osadczuk, Indiana Department of Transportation

emc: Anthony DeSimone, Federal Highway Administration, Indiana Division  
Lyle Sadler, Indiana Department of Transportation  
Mary Crowe, Indiana Department of Transportation  
Linda Weintraut, Ph.D., Weintraut & Associates Historians, Inc.



Prairie Band Potawatomi Nation  
Government Center

June 29, 2004

Robert F. Tally, Jr., P.E., Division Administrator  
Indian Division Federal Highway Administration  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

RECEIVED FHWA  
JUL 26 04  
INDIANA DIVISION

Dear Mr. Tally:

I am writing to inform you that I am in receipt of your recent National Historic Preservation Act (NHPA), Section 106 and Section 110 correspondence.

After reviewing the contents of your recent mailing we would like to inform that we have no objections to the following project(s):

**Project(s): I-69 North Tier 2, Section 6**

At this time we are unaware of any historical/cultural resources in the proposed development area. However, we do request to be immediately contacted if any inadvertent discoveries are uncovered at anytime throughout the various phases of the project.

Please feel free to call me at (785) 966-4007 or additional information can be faxed to (785) 966-4009. We look forward to working with you.

Respectfully,

Zach Pahmahmie  
Tribal Chairman  
NAGPRA Representative  
Prairie Band Potawatomi Nation

ZP/vrs



June 29, 2004

Jon Smith  
State Historic Preservation Office  
402 West Washington Street, W274  
Indianapolis, Indiana 46204

Re: Consulting Parties  
Tier 2 I-69 Evansville to Indianapolis Study: Invitations

Dear Mr. Smith:

Pursuant to Section 800.3 of 36 CFR Part 800, the Federal Highway Administration has initiated consultation for the I-69 Evansville to Indianapolis Tier 2 Study.

FHWA has issued an invitation to all consulting parties who participated in the Tier 1 Section 106 consultation; section consultants for the Tier 2 study have supplied the names and addresses of some additional consulting parties. I have enclosed a copy of the invitation and a list of all who have been mailed an invitation for your review.

If you wish to submit names of additional consulting parties, please send that information to Weintraut & Associates, 1555 West Oak Street, Suite 20, Zionsville, Indiana 46077 or email [lweintraut@ameritech.net](mailto:lweintraut@ameritech.net).

Best regards,

Linda Weintraut, Ph.D.



Prairie Band Potawatomi Nation  
Government Center

July 1, 2004

Robert F. Tally, Jr.  
Indiana Division Federal Highway Administration  
575 N. Pennsylvania St., Room 254  
Indianapolis, Indiana 46204

Dear Sir or Madam:

We have received correspondence from your office addressed to the former administration or to an incorrect address. Please update your records to reflect the current administration and correct address:

Zachariah Pahmahmie  
Tribal Chairman  
Prairie Band Potawatomi Nation  
Government Center  
16281 Q Road  
Mayetta, Kansas 66509

Chairman Pahmahmie also serves as the Native American Graves Protection and Repatriation Act tribal representative.

Thank you

Sincerely,

Verna Simon  
Legislative Assistant

cc: Correspondence



## I-69 EVANSVILLE TO INDIANAPOLIS TIER 2

---

### Meeting Minutes-Section 106

February 15, 2005

#### Attendance:

Frank Hurdis, DHPA/SHPO  
John Carr, DHPA/SHPO  
Karie Brudis, DHPA/SHPO  
Rick Jones, DHPA/SHPO  
Mary Kennedy, INDOT  
Linda Weintraut, Weintraut & Associates  
Connie Zeigler, Weintraut & Associates

**IHSSI Cards:** While the descriptions were good and for the most part the cards were satisfactory, the following problems should be addressed on the cards for Section 1.

- 1) No UTM coordinates are recorded; Weintraut said either the UTM coordinates or GPS number would be added. This was agreeable to SHPO. Karie Brudis indicated that a list of survey numbers with GPS points would be acceptable.
- 2) The number of resources shown on the site plan isn't always reflected in the contributing and non-contributing numbers noted by the surveyor in sections 25 and 26 of the forms. Weintraut said this would be checked and corrected.
- 3) Sometimes the property is rated contributing but there are no contributing resources shown. Weintraut said the consultants were asked to record a card on all resources formerly rated contributing, even if they had fallen into the non-contributing category; this might account for the discrepancies. This will be checked.
- 4) Sometimes the resource count is missing. Weintraut: this will be corrected.
- 5) Sometimes the descriptions indicate that a property might be Notable, yet it is rated Contributing. An example is the Vincent Georges property #35032. Weintraut asked if the consultants should be rating the properties since they haven't viewed all the properties in the township. Hurdis said yes they could assign that rating; it was agreed that Weintraut & Associates would review all ratings and could attach a post-it note indicating the property was worthy of a Notable or Outstanding rating.

Weintraut said that all the survey cards will be checked and corrected as necessary at Weintraut & Associates offices.

#### Historic Property Report: Section 1

- 1) Specific questions about the Henry Bessing farmstead: the property was not deemed eligible, and yet, it seemed good enough to have been considered. In that case, it should have been one of the selected ineligibles described in the report so that the consultant could justify the ineligible designation.
- 2) John Carr noted that it was good to see specific properties cited in the context.

- 3) SHPO agreed with the assessment that there are no eligible properties in Section 1.

### **Historic Property Reports-In General**

- 1) SHPO requested the survey forms for each section so they can review them as they read the reports.
- 2) It was decided that the selected ineligible sections of the Historic Property Reports should include the best of the properties that are not deemed eligible as well as all properties formerly rated Notable or Outstanding and the introduction to each ineligible section should include a paragraph why these particular properties had been singled out for discussion. This paragraph should also indicate those properties that were “borderline.”
- 3) The historic property reports (future ones) will include a photograph and brief description of integrity of all properties that were not previously inventoried. It was agreed that a photograph and a notes on integrity could be added to the existing table format.

### **Quarries:**

John Carr asked that Rick Jones join the group.

Issues of quarries will need to be addressed by Sections 4 and 5. Section 4 has quarries in the APE but not in the corridor. Section 5 has at least one quarry in the corridor, the Vernia quarry.

- 1) The consultants will evaluate the integrity and resources at the quarries, but the PMC wants to create a methodology so they will be consistent in evaluation.
- 2) Weintraut referred to the NR nomination of the Woolery site, which provides a model. The nomination compares the Woolery to other sites in a table format. SHPO and Weintraut agreed that this would be a useful way to look at the quarries in these sections. It was agreed that the Woolery site would be the standard with which the other sites will be compared.
- 3) The Vernia site was discussed. Rick Jones said that Tom Beard did the initial archaeological reconnaissance of the site and concluded only that it should be looked at in the future. Jones said the next step would be some sort of archaeology at the site.
- 4) Bob Bernacki has told Rick Jones that the Woolery nomination would provide context for the mills/quarries.
- 5) Hurdis said an eligible mill would have a “more complete above-ground picture” and not just remnants.

- 6) Jones said he could contact a couple of industrial archaeologists and get an idea of what to look for at quarries. He thought it would be a good idea to compare the milestones in the industry, which Weintraut has begun to compile from secondary sources, with the resources extant at Vernia. He doesn't believe the Vernia site was excavated with a plan, but rather simply followed the vein of limestone.
- 7) John Carr and Frank Hurdis were agreeable to participating in a tour of the quarry sites, if it was appropriate.

**Eligibility issues: Pleasant View**

The final issue was to ask SHPO for an opinion on the Pleasant View (Monroe 30055). The property is in the overlap area between Sections 4 and 5; the two consultants disagree as to its status.

Hurdis indicated that the property was "borderline" but would give it the benefit of the doubt for inclusion due to the large number of extant outbuildings and the dwindling number of similar resources in the township. However, the interior plan characteristics need to be extant for inclusion.

Weintraut thanked SHPO for ongoing consultation.

Meeting concluded.

*Details discussed in this meeting are subject to change, but are a reflection of how things stood at the close of the meeting.*

*Note: This meeting summary documents ongoing, internal agency deliberations. Accordingly, the information contained in this summary is considered to be pre-decisional and deliberative.*



RECEIVED SEP 9 2005

Mitchell E. Daniels, Jr., Governor  
Kyle J. Hupler, Director

Indiana Department of Natural Resources

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



September 7, 2005

Robert F. Tally, Jr., P.E.  
Division Administrator  
U.S. Department of Transportation  
Federal Highway Administration, Indiana Division  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration

Re: I-69 Evansville to Indianapolis executive summary and historic properties draft report for Tier 2, Section 6 (SR 39 to I-465)

Dear Mr. Tally:

Pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated August and 15, 2005, and received on August 15 and 17, 2005, for the above indicated project.

We have reviewed the Draft of Tier 2 Historic Property Report for the I-69 Indianapolis to Evansville project – Section 6 and we agree with the proposed findings of eligibility and non-eligibility for the properties identified in the report. However, based upon the photographs provided, the concrete girder bridge carrying Old SR 37 over Crooked Creek appears to be very similar to Morgan County Bridge #166 carrying Old SR 37 over Bluff Creek, which has been determined eligible for inclusion in the National Register of Historic Places. Please provide additional explanation as to why the bridge over Crooked Creek is not individually eligible for inclusion in the National Register.

*A copy of the revised 36 C.F.R. Part 800 regulations that went into effect on August 5, 2004, may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference.* If you have questions about our comments, please call Karie A. Brudis of our office at (317) 232-1646.

Very truly yours,

Jon C. Smith  
Deputy State Historic Preservation Officer

JCS:KAB:kab

- cc: Linda Weintraut, Ph.D., Weintraut & Associates Historians, Inc.
- emc: Janice Osadczuk, Indiana Department of Transportation
- Anthony DeSimone, Federal Highway Administration, Indiana Division
- Ben Lawrence, Indiana Department of Transportation
- Mary Crowe, Indiana Department of Transportation
- Thomas Cervone, Ph.D., Bernardin, Lochmueller & Associates, Inc.



October 24, 2005

Jon Smith  
State Historic Preservation Office  
402 West Washington Street, W274  
Indianapolis, Indiana 46204

**Re: Morgan 30025, Old State Road 37 Bridge over Crooked Creek  
Tier 2, I-69 Evansville to Indianapolis Study: Section 6**

Dear Mr. Smith:

In response to a letter dated September 7, 2005, from your office with respect to the Historic Property Report for Section 6 of the Tier 2 Study of the I-69 project, specifically questioning the eligibility status of the Morgan County Bridge over Crooked Creek at Old SR 37, we are conveying the following additional explanation/information that you requested.

The Old State Road 37 Bridge over Crooked Creek was identified in the Historic Property Report as a reinforced concrete girder. This bridge is of T-beam construction with two spans, each approximately 30 feet long, and a 20-foot roadway. Nine beams on concrete piers support the deck. The bridge has concrete rails with bush-hammered panels, and concrete wing walls. The bridge was built as part of the new state road between Bloomington and Indianapolis c.1925. It was bypassed in the 1970s when State Road 37 was re-routed and is now on a dead end road.

Numerous T-beam bridges on county roads, state highways, and former state highways were identified in *Artistry and Ingenuity in Artificial Stone*. Generally, the T-beams included in this publication are skewed, noted for their length, or have some other distinguishing feature. No distinguishing features were observed for the Old State Road 37 Bridge over Crooked Creek, which was not included in *Artistry and Ingenuity in Artificial Stone*. The bridge was also not identified in the *Morgan County Interim Report*.

Two T-beams in Morgan County were identified in *Artistry and Ingenuity in Artificial Stone*. These are Morgan County Bridge No. 162 (Old State Road 37 over Clear Creek, 1925), and Morgan County Bridge No. 1560 (State Road 67 over Fall Creek, c.1939).

The Crooked Creek Bridge and Morgan County Bridge #166 are both concrete spans, but are different types. Bridge #166 is a slab. Slabs were also common on state highways, but Bridge #166 is significant as the oldest unaltered slab of state design, and also as a rare example of a slab designed to carry fill over the deck; it was found eligible in the Historic Property Report.

The Crooked Creek Bridge is a common concrete span T-beam bridge with no distinguishing features and, aside from its location on old SR 37, no significant historical associations.

As a result, the historian for Section 6 of the project, determined that the bridge (Morgan 30025) did not possess the qualities necessary for listing in the National Register of Historic Places. If you have further questions, please do not hesitate to call.

Best regards,

Linda Weintraut, Ph.D.  
Weintraut & Associates

emc: Janice Osadczuk, Indiana Department of Transportation  
Anthony DeSimone, Federal Highway Administration, Indiana Division  
Tom Seeman, Indiana Department of Transportation  
Joe Gustin, Indiana Department of Transportation  
Michelle Hilary, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Thomas Cervone, Ph.D., Bernardin, Lochmueller & Associates, Inc.



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Indiana Department of Natural Resources

Mitchell E. Daniels, Jr. Governor  
Kyle J. Hupler, Director

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



November 21, 2005

Linda Weintraut, Ph.D.  
Weintraut & Associates, Inc.  
33 East Cedar Street  
Zionsville, Indiana 46077

Federal Agency: Federal Highway Administration

Re: Response to request for additional information concerning Old SR 37 bridge over Crooked Creek in relation to I-69 Evansville to Indianapolis Tier 2, Section 6 (SR 39 to I-465)

Dear Dr. Weintraut:

Pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated October 24, 2005, and received on October 27, 2005, for the above indicated project.

Thank you for providing additional information regarding the eligibility of the concrete girder bridge carrying Old SR 37 over Crooked Creek. We agree with the assessment and do not have any further concerns regarding the bridge.

*A copy of the revised 36 C.F.R. Part 800 regulations that went into effect on August 5, 2004, may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference. If you have questions about our comments, please call Karie A. Brudis of our office at (317) 232-1646.*

Very truly yours,

Jon C. Smith  
Deputy State Historic Preservation Officer

JCS:KAB:kab

- cc: Robert F. Tally, Federal Highway Administration, Indiana Division
- emc: Janice Osadczuk, Indiana Department of Transportation
- Anthony DeSimone, Federal Highway Administration, Indiana Division
- Ben Lawrence, Indiana Department of Transportation
- Mary Crowe, Indiana Department of Transportation
- Thomas Cervone, Ph.D., Bernardin, Lochmueller & Associates, Inc.

**Section 6, Field Tour – Historic Properties**  
**January 9, 2006**

**Attendance:**

John Carr, IDNR-DHPA  
Karie Brudis, IDNR-DHPA  
Mary Kennedy, INDOT  
Tony DeSimone, FHWA  
Kia Gillette, Bernardin Lochmueller and Associates  
Linda Weintraut, Weintraut & Associates  
Connie Zeigler, Weintraut & Associates  
Tim Miller, HNTB  
Laura Thayer, Section 6 Historian

**Sutton House, 988 N. Bluff Road, Johnson County – (Johnson 10002)**

- *Background:* The Sutton House property, two parcels, sold in one lot for \$330,000 in a recent auction. The house is being renovated for an office building. The remodeling is not expected to include window replacement, but will include adding insulation and improvements to the lighting. The exterior of the house is expected to remain the same.
- *Undertaking at current SR 37 and County Line Road:* Alternatives at this location may include shifting existing SR37 to the west (opposite of the property). It is possible no right of way would be required from the east side of the roadway. The historic boundary is approximately 375 feet from the existing roadway.

There is a proposed diamond interchange at County Line Road. The ramps of the interchange may elevate County Line Road to about the height of the current traffic lights.

1. It is approximately 1000 feet to the interchange; the maps handed out are not necessarily showing the preferred alternative, they are simply a guide.
2. County Line Road will likely be shifted to the north a bit. SHPO asked if all alternatives include shifting County Line Road to the north. Section 6 indicated that two alternatives include a relocated County Line Road to the north and one alternative maintains the existing County Line Road alignment.
3. The question of *integrity* regarding the property arose, especially concerning any re-evaluation once the current renovations are finished.
  1. SHPO said that, since it is listed under Criterion C for architecture, there would be no need to reexamine it unless the exterior is changed.
  2. Only the smoke house is contributing.

**Morgan County Bridge 166, Old State Road 37, Morgan 30017**

- *Background:* The bridge was built around 1925 and is the oldest unaltered slab design.
- There may be an increase in traffic on old SR 37.
- There were no expressed concerns about effects on this property.

#### **Cemetery at Henderson Ford Road**

- One alternative includes an interchange at Henderson Ford road. However, the interchange will be slightly to the north of the existing intersection. This northern shift allows any new required right of way to be well beyond 100 feet of the cemetery.
- There were no expressed concerns or questions about this property.

#### **Stockwell Bridge, Teeters Road, Morgan 60053**

- *Background:* This is a Luten truss bridge. The truss appears to be inside the beams.
- The project may relocate Teeters Road to the north in order to stay away from the fish hatchery ponds to the south.
- A cul-de-sac would most likely be constructed just west of the bridge; thus decreasing traffic on the bridge. Traffic numbers will be important for this bridge.
- The amount of revised traffic that the bridge will carry will most likely determine the effect. If traffic projections indicate less traffic on the project, no adverse effect is likely as long as the bridge continues in use. Existing and project bridge traffic numbers will be evaluated during the effects evaluation. The effects report will include all alternatives so consulting parties will have an opportunity to comment on all alternatives.

#### **Grassyforks Fisheries, 2195 Old SR37, Morgan 60012**

- *Background:* The property is owned by the Ozark fishery, which is located on SR 37 and occupies ponds on SR 37 that were also, at one time, part of Grassyforks. Ozark currently uses some of the ponds on the historic property. Cikana fishery, now operated by the state, was also part of Grassyforks at one time. Some historical societies have expressed interest in acquiring a building on the property.
- *Consensus:* the project will have no impact on the property unless the toll option significantly increases traffic on old SR37.

#### **Nutter House, 1089 East Harrison Street, Martinsville, Morgan 64053**

- *Consensus:* No concerns about the effects of the undertaking on the Nutter House due to the distance from the proposed project (approximately 1 mile).
- Question was raised why the Queen Anne house across the street from the Nutter House was not eligible. The Section 6 Historian said that the porch was replaced and the siding is vinyl and there have been additions.

#### **East Washington Street Historic District**

- *Consensus:* No effect due to the distance from the proposed project.

**Morgan County Bridge 224, Old SR37 over Bluff Creek, Morgan 60030**

- *Background:* This bridge was constructed about 1926 and is a 3 span pony truss on a skew. It has a slight bow at the top. The inspection report suggests that it is pass due for replacement. This bridge is in the overlap with Section 5.
- *Likely scenario:* road will be a cul de sac before it reaches current SR 37 and will serve local traffic only. The traffic will decrease significantly.
- There were no additional questions or concerns.

**Wilson Family Cemetery**

- The Wilson Family Cemetery is now located behind a Holiday Inn. The cemetery will not be affected by the project, but is especially close to the new motel.
- The cemetery is not eligible for the National Register.

**Top Notch Farm, 351 E. Mahalasville Road, Martinsville, Morgan 60028**

- *Background:* This farm was built in the 1930s as investment to be a dairy farm. It includes a livestock barn, dairy barn, house, garage, and milk house. The house has been altered.
- The city of Martinsville wants an interchange at Ohio Street and I69 (current day SR 37 alignment), about 1000 feet from Top Notch. If this interchange is carried forward, the private unpaved lane that runs in front of the property to the south will be paved and widened to 2 lanes in order to serve as an access road to the south. The apartments and Shell gas station that currently are between Top Notch and existing SR37 will likely be acquired if an interchange is constructed.
- Much discussion occurred. Section 6 recommended it eligible under Criterion A. The existing setting has somewhat been compromised with urban development. [Information gathered after the meeting has determined that a light retail center is planned for an open field in front of the property. A dirt drive will be paved in order to carry traffic to the center.]
- Potential effects from an interchange: increase in traffic and a change in view shed.
- PMC questioned the feeling and association of the property with the present commercial development in close proximity.
- There was some discussion comparing the Sutton House to Top Notch. Both already have compromised setting due to commercial encroachment.
- There was no consensus as to effect.
- Regarding potential mitigation (if this property has an adverse effect), it will be difficult to lessen the impact on the property so alternative mitigation (such as public interpretation) may be appropriate.



**TRANSMITTAL**

**To: Dr. James R. Jones III, State Archaeologist  
Indiana Division of Historic Preservation and Archaeology**  
**From: Alice Roberts, Gray & Pape, Inc., for  
Project Management Consultant**  
**Date: 24 August 2006**  
**Re: I69 Section 6 Literature Review Document**

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Enclosed please find a copy of the Section 6 literature review document, prepared by University of Kentucky, Program of Archaeological Research for your review and comment. Please return all comments to me. Thank you. Alice.

Cc: Chris Koeppel, INDOT  
Curtis Tomak, INDOT  
Jason Dupont, BLA  
Don Cochran, BSU

# DNR

Indiana Department of Natural Resources

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



December 21, 2006

Alice Roberts  
Consulting Archaeologist  
Gray & Pape, Inc.  
1318 Main Street  
Cincinnati, OH 45202

Federal Agency: Federal Highway Administration

Re: *Draft Phase Ia Literature Review Section 6, SR 39 to I-465 (Trader 7/31/06), Marion, Johnson, and Morgan counties, Indiana.*

Dear Ms. Roberts:

Pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated July 31, 2006 and received on August 28, 2006 for the above indicated project in Marion, Johnson and Morgan counties, Indiana.

Our office has a number of comments and questions regarding the draft report. The clarifications and questions will need to be addressed regarding the draft archaeological records check. Our office will await revisions to the archaeological records check.

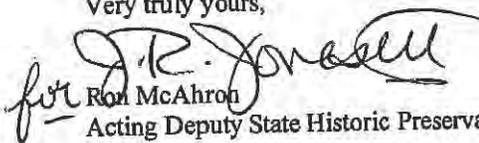
1. On page 17, it is stated that "Urban land complex soil types are typically disturbed and have a low potential for intact archaeological sites." Yet, historical archaeological sites may be present in areas designated as urban soils.
2. Under Section 3.1, Physiography and Topography, we suggest also citing Homoya (1985) for describing the physiography and topography, as well as for floral and faunal resources in Section 3.5.
3. In Section 5.0, Cultural Overview, the work of early archaeologists in the project area counties, such as Eggan (1930) and Householder (e.g., 1941) should be mentioned in reference to the nature of the archaeological resources and notable archaeological sites in the vicinity and region of the project area.
4. Under Section 5.1.1, "Paleoindian," the works of White (2005; 2006) should be cited.
5. In Section 5.1.2, Early Archaic, for the Kirk Tradition, characteristics of Kirk from the Swan's landing site and archaeological site 12Hr520, the Kirk site at Caesar's World, should be included.
6. Under Late Archaic, what are the cemetery/mortuary/burial mound characteristics of regional Late Archaic sites? Under the same section, for Terminal Late Archaic, for the Riverton culture, it is worth, for comparison, mentioning the characteristics of the Riverton site in Greendale, Indiana. This site also has mortuary remains and characteristics. What mortuary characteristics are there for the Riverton culture? Ellis et al. (1990) might also be consulted for background on Late Archaic.
7. In Section 5.1.3, under Middle Woodland, the discussion should include some mention of Streuver's contributions, such as in Streuver (1964, 1968) and Streuver and Houart (1968). Also, Mark Schurr and William Mangold (e.g., 2006) have conducted a number of recent studies of the Goodall sites in northern Indiana, which might be useful for comparison. Likewise, Crab Orchard might be mentioned for comparison purposes.
8. Under the sub-heading "Allison-Lamotte" on page 42, the discussion then goes on to central, east central sites and the Mann Site, leading one, inaccurately, to associate these with Allison-Lamotte. What comparable Mann Phase settlement patterns did Ruby describe? Also, in the discussion of Mann Site, Ruby (1997) should be cited.
9. Under "Albee Phase," page 43, the more recent study by McCord et al. (2005) should be cited. For Late

- Woodland, David Brose's writing on Late Woodland subsistence and technological changes in ceramics may be elucidating in the discussion on Late Woodland.
10. McCullough et al. (2005) provides additional up-to-date information on Late Prehistoric sites in central Indiana. Brian Redmond provides information on different settlement patterns on the forks of the White River.
  11. The White et al. reference in the References Cited section may be misdated. There is also a more recent White et al. (2003) reference that should be mentioned in the Late Prehistoric section.
  12. On page 53, third paragraph: The Wea are definitely referenced as being on the Wabash in 1708, and in 1715, they requested a French officer and missionary to come live among them (e.g., Jones 1984). In the fourth paragraph, it might be more accurate to note that the Delaware followed the White River, and were not just to the west of the study corridor.
  13. On page 54, Fort Ouiatenon was established in 1717 (Krauskopf 1955).
  14. On page 76, referring to aerial photographs for Marion County, there are more recent aeriels available for Marion County than 1962.
  15. On page 77, there is a statement about "a historic ca. 1750 Delaware village/French Trading Post." What evidence is there for this, and how reliable is the evidence?
  16. Under the "Historic Archaeology Survey Predictions . . .," the Jones (1997) citation is nine years old. Is there more recent historic information to contribute to the predictions?
  17. On page 79, while discussing history in the last paragraph, there is no mention of the Fowler-Mundy cemetery, which is shown in Figure A7 as within the proposed project corridor in Marion County. Also, the paragraph refers to Figures 7-9, but there are no Figures 8 and 9 in the report. Also, does Cochran and Maust's GLO study contain any information relevant to the historic resources of the project area?

Once the indicated information is received, the Indiana SHPO will resume review and comment for this project. Please keep in mind that additional information may be requested in the future.

*A copy of the revised 36 C.F.R. Part 800 that went into effect on August 5, 2004, may be found on the Internet at [www.achp.gov](http://www.achp.gov) for your reference. If you have questions about our comments, please call our office at (317) 232-1646. Questions about archaeological issues should be directed to Christopher Koepfel or Dr. Rick Jones.*

Very truly yours,

  
for Ron McAhron  
Acting Deputy State Historic Preservation Officer

RM:JRJ:jj

cc: Robert F. Tally, Jr., P.E., Federal Highway Administration, Indiana Division  
Christopher Koepfel, Indiana Department of Transportation  
Curtis Tomak, Indiana Department of Transportation  
Christie Stanifer, Indiana Department of Natural Resources, Division of Water  
Linda Weintraut, Ph.D., Weintraut & Assocs. Historians, Inc.  
Anthony DeSimone, Federal Highway Administration, Indiana Division  
Thomas Cervone, Ph.D., Bernardin, Lochmueller & Associates, Inc.

emc: Mary Kennedy, Indiana Department of Transportation



## I-69 Evansville to Indianapolis Tier 2 Studies

June 25, 2008

Dear Consulting Party:

**RE: I-69 Evansville to Indianapolis Tier 2 Study, Section 6  
Section 106: Historic Property Report**

The Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation, is preparing an Environmental Impact Statement (EIS) for Section 6 of the I-69 Evansville to Indianapolis Tier 2 project. Section 6 follows SR 37 from just south of Martinsville to I-465 in Indianapolis. Section 106 of the National Historic Preservation Act (1966) requires Federal agencies to take into account the effects of their undertakings on historic and archaeological properties.

Because you have agreed to be a willing consulting party, we are sending you a revised copy of the Historic Property Report on CD. If you wish to see a paper copy of the Historic Property Report, please contact:

**I-69 Section 6 Project Office  
7550 South Meridian Street, Suite B  
Indianapolis, Indiana 46217  
(317) 881-6408**

The Section 6 Project Office is open on Tuesday from 8:00 am to 5:00 pm. If these hours are not convenient, the Project Manager will make the report available to you at a mutually convenient time. The report will also be available at the Section 5 Project Office located in Bloomington, Indiana. Please see the website [www.i69indyenv.org](http://www.i69indyenv.org) for directions and hours.

If you should have any questions, comments, or written correspondence, please direct them to the I-69 Project 6 Project Office (see address above) by July 30, 2008.

Sincerely yours,

Tim N. Miller, CEP  
I-69 Section 6 Project Manager

Enclosure  
cc: Tony DeSimone, FHWA  
Christopher Koepfel, INDOT

# DNR

Indiana Department of Natural Resources

Mitchell E. Daniels, Jr., Governor  
Robert E. Carter, Jr., Director



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

July 25, 2008

Tim N. Miller, CEP  
I-69 Section 6 Project Office  
7550 South Meridian Street, Suite B  
Indianapolis, Indiana 46217

Federal Agency: Federal Highway Administration

Re: "I-69 Corridor Tier 2 Studies, Evansville to Indianapolis, Historic Property Report, Section 6, SR 39 to I-465," June 23, 2008 (Des. No. 0300382; DHPA #4615)

Dear Mr. Miller:

Pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f) and implementing regulations at 36 C.F.R. Part 800 and pursuant to the National Environmental Policy Act (42 U.S.C. § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the compact disc containing the June 23, 2008 historic property report ("HPR"), which was submitted with your June 25, 2008 cover letter, and which was received on June 26, and the paper copy of that same report, transmitted under a memorandum from Dr. Linda Weintraut dated July 15, 2008 and received on July 21, regarding the aforementioned project in Morgan, Johnson, and Marion counties in Indiana.

We agree with the recommendations in the HPR regarding the eligibility or ineligibility for the National Register of Historic Places of the properties in Section 6 that were identified in that document.

If you have questions regarding our comments, please contact John Carr at (317) 233-1949 or [jcarr@dnr.IN.gov](mailto:jcarr@dnr.IN.gov). In all future correspondence regarding the above indicated project, please refer to DHPA #4615.

Very truly yours,

James A. Glass, Ph.D.  
Deputy State Historic Preservation Officer

JAG:JLC:jlc

cc: Robert F. Talty, Jr., P.E., Division Administrator, Indiana Division, Federal Highway Administration  
Michelle Allen, Manager, Office of Environmental Services, Indiana Department of Transportation

emc: Anthony DeSimone, Federal Highway Administration, Indiana Division  
Christopher Koeppel, Administrator, Cultural Resources Section, Office of Environmental Services, Indiana Department of Transportation  
Mary Kennedy, Cultural Resources Section, Office of Environmental Services, Indiana Department of Transportation  
Thomas Cervone, Ph.D., Bernardin, Lochmueller & Associates, Inc.  
Jason DuPont, P.E., Bernardin, Lochmueller & Associates, Inc.  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.



## MEETING MINUTES

***Section 6 Section 106 Meeting***  
 INDOT, Room N642  
 January 13, 2015 at 1:00 p.m. EDT

Attendee	Organization
Paul Diebold	IDNR DHPA
John Carr	IDNR DHPA
Wade Tharp	IDNR DHPA
Chad Slider	IDNR DHPA
Mitch Zoll	IDNR DHPA
Patrick Carpenter	INDOT
Mary Kennedy	INDOT
Shaun Miller	INDOT
Matt Coon	INDOT
Chris Meador	HNTB Corporation
Kia Gillette	Lochmueller Group
Linda Weintraut	Weintraut & Associates
Beth McCord	Gray & Pape

- I. Introductions – Patrick Carpenter/Kia Gillette
  - a. Patrick Carpenter welcomed all attendees and thanked them for participating in the meeting.
  - b. Kia Gillette asked all participants to introduce themselves.
  
- II. Project Approach – Kia Gillette
  - a. Section 6 of I-69 may be different than the previous sections because INDOT may be exploring alternatives outside of the SR 37 corridor that was identified in the Tier 1 Record of Decision (ROD).
  - b. A Notice of Intent for Section 6 was published in the Federal Register on October 15, 2014.
  
- III. Above-Ground Resources – Linda Weintraut
  - a. Status of Previous Work
    - i. Linda Weintraut summarized the identification and evaluation efforts for above-ground resources to date. A Draft Historic Property Report (HPR) was published in 2005 for the SR 37 alternatives and a Final HPR was sent to SHPO and consulting parties in July 2008.



- ii. Weintraut & Associates (W&A) will be conducting an Additional Information (AI) study of the SR 37 alternatives that will cover the years from 1955 to 1972 (with 2022 the estimated construction date).
- iii. W&A has drawn a preliminary Area of Potential Effects (APE) for the SR 37 alternatives that utilizes the previous SR 37 APE and modifies that APE to include buffers to interchanges, overpasses and access roads that extend outside of the previous APE.
- iv. INDOT indicated that for the Section 6 alternatives on SR 37, there may be opportunities to reexamine the APE. Linda Weintraut indicated that if she were drawing the APE today, without the previous APE, she would have narrowed it in areas where the alignments will be on SR 37 but there are no overpasses or interchanges.
- v. IDNR DHPA indicated the highway will likely look similar except in areas where there will be interchanges and access roads. It may not be as necessary to look as far as a new terrain road. In areas where access to historic properties may be affected, there may be a need to look at a wider area for access purposes.
- vi. It was agreed that W&A will revisit the APE to ascertain if there are areas where it would make sense to narrow it for the SR 37 alternatives. For new terrain alternatives, the previously established methodology will be used for the APE (start with a one-mile buffer on either side of the alternative and narrow it where warranted due to visual intrusions).

b. Survey Methodology

- i. For the survey of recent past properties (1955-1972), W&A originally intended to use aerial photographs to identify recent past construction; however, this approach was found to be cost prohibitive due to the cost of the historic aerial photographs. Rather, W&A is proposing to use historic topographical mapping, which exists for most of the area for 1955 and 1965 “marked up” to 1980. The “mark up” map means that there are properties that fall into a range that additional research may need to be conducted to discern age.
- ii. W&A is using on-line county GIS and other information gathering sites to ascertain the date of construction for subdivisions in order to direct the field survey once it begins. The field survey is on hold until a methodology for the Notice of Survey letters is developed.
- iii. There are a number of properties that fall into the 1955-1972 date range. As part of record keeping for non-contributing properties, W&A recommended that photographic documentation with embedded GPS coordinates to record the location of properties, rather than a traditional photo log of each property. This would save time by not requiring labeling each property with an address in a photo log, while still keeping a record of the information. INDOT and IDNR DHPA agreed that this was a good way of retaining a record of the properties surveyed. Contributing properties would be fully logged and labeled.



c. Eligibility Criteria

- i. The methodology for determining eligibility for recent past properties was discussed. Regarding the characteristics that an individual, contributing, recent past resource should possess, W&A suggested it should have extremely high integrity in terms of cladding, windows and doors, massing, and roof line. If it has something “special” about it, then it could be elevated to eligible. IDNR DHPA discussed some of the Registration & Survey’s thoughts on eligibility and provided a handout on some of their eligibility guidelines.
- ii. After discussion, meeting participants generally agreed with the premise; however, after the reconnaissance, a meeting could be held in which photographs could illustrate the range of integrity. Or, if appropriate, a field meeting could be held to review potential resources.
- iii. Regarding subdivisions, W&A asked if these could be identified as a whole, especially if no individual property possessed sufficient integrity to be classified as eligible. Photographs would be taken of streetscapes and notes taken about the integrity of the district as supporting documentation if it was not eligible. If a district is believed to be eligible, representative photographs would be taken of houses. If a house within a subdivision was thought to be individually eligible, that would be noted as well. Meeting participants agreed this methodology should be pursued.
- iv. IDNR DHPA added a caveat, for post war housing, some districts will only meet criterion A. This will only be known if research is completed. It is similar to the bungalow neighborhoods 15-20 years ago.
- v. W&A suggested that those properties previously surveyed would be re-surveyed during the reconnaissance to ascertain whether there had been changes in integrity that would affect status. During the survey, the historians would also look to see if the changing environmental has affected the eligibility of properties. For example, good farmsteads are rarer than 10 years ago (when the original survey was completed). Meeting participants agreed that historians should make recommendations about changes in eligibility.

d. Historic Property Cards

- i. No Historic Sites and Structures cards will be prepared since they are no longer being used by the IDNR DHPA. [A review of the Tier 1 Memorandum of Agreement (MOA) after the meeting did not include preparation of these cards as a requirement of the project.]

IV. Archaeology – Beth McCord

a. Status of Previous Work

- i. Gray & Pape (G&P) indicated an archaeological records check was completed by the University of Kentucky in 2006. IDNR DHPA provided



comments, but the records check has not yet been revised to address these comments. That will be completed in the survey report.

- ii. The previous survey, conducted by CRA, consisted of about 185 acres and 12 archaeological sites were identified. A management summary was prepared, but it was not submitted to IDNR DHPA.

b. Survey Methodology

- i. G&P will complete a desk top assessment and literature review for the SR 37 alternatives and update the previously completed documentation.
- ii. A field survey of the SR 37 alternative up to SR 144 will be completed this spring/summer. The remaining portion of the preferred alternative will be surveyed next year.
- iii. G&P suggested that for the existing SR 37 right-of-way, per discussions with INDOT, only portions that do not appear disturbed would be surveyed. The existing right-of-way generally includes pavement, grass median, ditches and a fence line.
- iv. IDNR DHPA indicated they were ok with not surveying existing disturbed soils. INDOT suggested conducting a windshield survey to eliminate the disturbed areas. INDOT and DHPA should be invited to attend this survey. A methodology should be developed for the windshield survey and included in the Phase Ia report. Ideally this would be completed while the leaves are off the trees.
- v. G&P added that if it cannot be determined visually if the soils are disturbed, a pedestrian survey or shovel tests will be completed.

c. Archaeology Predictive Model

- i. G&P asked if a predictive model was developed for archaeology, could it be used to expand the width of transects in low probability areas? IDNR DHPA agreed, but said to make sure the methodology was approved by their agency before the survey.

V. Next Steps

- a. W&A will review the APE and suggest any revisions with a justification. W&A will also develop a methodology for the above-ground resources survey for INDOT and IDNR DHPA review.
- b. G&P will develop a methodology for the windshield survey for INDOT and IDNR DHPA review.
- c. G&P will develop a methodology for the archaeology predictive model for INDOT and IDNR DHPA review.

*Details discussed in this meeting are subject to change. This summary is a reflection of the status of these items at the close of the meeting.*



*These meeting minutes represent the understanding of the events that occurred. Please forward any comments or revisions to the attention of Kia Gillette.*

**Note: This meeting summary documents ongoing, internal agency deliberations. Accordingly, the information contained in this summary is considered to be pre-decisional and deliberative.**



# REVIEW REQUEST SUBMITTAL

State Form 55031 (7-12)

Indiana Department of Natural Resources

Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



**Please complete this form and attach it to front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review.**

Date: February 5, 2015

Is this a new submission?       Yes       No

Reference for previous submittals: DHPA # \_\_\_\_\_ Des. No. \_\_\_\_\_

### **THIS REVIEW REQUEST SUBMITTED BY:**

Name: Linda Weintraut

Company/Organization: Weintraut & Associates, Inc.

Address: P.O. Box 5034

Telephone number: 317-733-9700      Email address: linda@weintrautinc.com

### **PROJECT NAME & LOCATION** *[Please attach a map with location(s) marked]*

Project Name/Reference: I-69, Section 6      Project/ Des # 0300382

Project Address/Location: Martinsville to Indianapolis, Indiana

City: Martinsville to Indianapolis      Township(s): Perry, White River, Washington, Green, Clay

County/COUNTIES: Morgan, Johnson, Marion

### **STATE OR FEDERAL AGENCY INVOLVEMENT**

Agency: Federal Highway Administration      Program: \_\_\_\_\_

Type of funds, license, or permit to be obtained (if applicable): \_\_\_\_\_

Name(s) of Agency Contact: Michelle Allen

Address: 575 North Pennsylvania Street, Room 254, Indianapolis, Indiana 46204

Telephone number: (317) 226-7344      Email address: michelle.allen@dot.gov

### **APPLICANT (if different than Federal Agency)** *If available, please attach copy of authorization letter from federal agency*

Applicant: Indiana Department of Transportation

Name of Contact: Patrick Carpenter

Address: 100 North Senate Avenue, IGCN 642, Indianapolis, IN 46204

Telephone number: 317-233-2061      Email address: 317-233-2061

**CONSULTANT FOR THE APPLICANT OR AGENCY (IF APPLICABLE)**

Consultant: Lochmueller Group

Name of Contact: Kia Gillette

Address: 3502 Woodview Trace, Suite 150 Indianapolis, Indiana 46268

Telephone number: 317-222-3878 Email address: KGillette@lochgroup.com

**Contact for DHPA questions regarding this review request:** Linda Weintraut

Comments:

***Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:***

- Full contact information for person/entity submitting form, including phone number and email *(if available)*
- Map of project location with project area(s) clearly marked *(provided in current or previous submission)*
- Clear photographs of project area and surroundings
- Project description
- Description of any proposed ground disturbance
- Name of Federal agency/agencies and program providing funds, license, or permit
- Letter of authorization from Federal agency/agencies *(if applicable)*

**Return this Form and Attachments to:**

**Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, Indiana 46204**

**<http://www.in.gov/dnr/historic>**



February 5, 2015

Mitch Zoll  
Division Director  
Indiana Division of Historic Preservation and Archaeology  
402 West Washington Street, W274  
Indianapolis, Indiana

Re: I-69 Evansville to Indianapolis Tier 2 Study: Section 6  
Meeting Minutes, Revision to Area of Potential Effects (APE), and  
Methodology of Survey for Additional Information Study  
(Des. No.: 0300382; DHPA No.: 4615)

Dear Mr. Zoll:

The Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation (INDOT), is conducting Section 106 consultation as part of the I-69 Evansville to Indianapolis Tier 2 Studies, Section 6.

To summarize the status of Section 106 efforts for Section 6: the aboveground survey was conducted in 2004 and the final Historic Property Report for this survey was published in 2008. To date, FHWA has not issued a Findings and Determinations of Area of Potential Effects (APE) and Eligibility for this section.

As we have discussed, FHWA and INDOT have charged consultants for Section 6 with the task of conducting an Additional Information (AI) Survey and preparing an AI Report for the SR 37 Alternatives. As the first step in this effort, consultants for Section 6 have reviewed the APE from the 2004 survey and made modifications to it based on present information. They have also prepared a methodology for the AI Survey based on the consultation with you and your staff on January 13, 2015.

The minutes of the meeting held on January 13, 2015, a map of the modified APE, and a methodology for the survey are attached for your review and comment.

Thank you in advance for all of your help with this project.

Sincerely,

Linda Weintraut, Ph.D.  
President, Weintraut & Associates, Inc.

Enclosures



Cc: Michelle Allen, FHWA  
Patrick Carpenter, INDOT  
Mary Kennedy, INDOT  
William Wiedelman, HNTB  
Tim Miller, Lochmueller Group  
Kia Gillette, Lochmueller Group



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## MEMORANDUM

**To:** Mitchell Zoll, Office of the State Historic Preservation Officer

**From:** Linda Weintraut, Weintraut & Associates, Inc.

**Date:** February 4, 2015

**Re:** Methodology for Section 6 Aboveground Survey & Reporting

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This memo formalizes the methodology for survey and reporting those activities as discussed during an agency meeting January 13, 2015.

### SR 37 Additional Information (AI) Report

- **Re-establish the Area of Potential Effects (APE) for SR 37:**
  1. Review the largest footprint for all of the most recent SR 37 Alternatives, as of January 30, 2015.
  2. Review the APE established in 2004; re-examine to see if should be reduced or expanded based on the current SR 37 Alternatives.
    - a. The historians recommend that the 2004 APE should not be reduced since this is an APE that has been reviewed by consulting parties and concurred upon by the State Historic Preservation Officer. In addition, the areas of possible reduction were minor; the reduction in APE would not significantly reduce field time.
    - b. Along SR 37, where there is less than a 2000 foot buffer from the most recent SR 37 Alternatives, the APE is expanded to include a 2000 foot buffer; this takes into account effects where there may be overpasses and interchanges.
    - c. Along I- 465 where there footprint of the most recent SR 37 Alternatives has expanded, the APE is only 1,000 feet on either side of the interstate, a methodology consistent with the Tier 1 APE, which was established along I-70.
  
- **Basic Premise of AI Survey and AI Report for SR 37:**
  1. The AI survey will address those properties in the APE constructed between the years 1955 and 1972 (year of cutoff for the 2004 survey for Section 6 or that will come of age by the year 2022, the projected construction date for the undertaking).
  2. W&A will survey aboveground resources with excellent integrity constructed prior to 1972 in any areas where the APE has been expanded since the 2004 survey.
  3. Since the DHPA is no longer using paper survey forms, these forms will not be filled out during the Section 6 survey; the DHPA's survey forms will not be a deliverable.
  4. W&A will review previously-surveyed properties to ascertain if there has been a change in status; status will be updated in the AI Report to reflect changes. Historians will not re-evaluate every property previously surveyed or those properties rated Non-contributing, unless there has been a visible, apparent change in status.
  5. The historic context will include the years 1955-1972 and will examine selected themes relevant to APE.
  6. AI Report will be prepared (see detail below) for the SR 37 Alternatives.



- **Identification of Historic Properties, Survey and Reporting for SR 37:**

1. Geo-rectify and review historic-era and modern topographical quadrangle maps for the APE to ascertain those areas where additional research is needed.
2. Compare topographical maps to available GIS data to determine date of construction for properties constructed between 1965 and 1980 that are not in subdivisions. Note that quadrangle maps for much of this area are available in a version that is a 1965 map, “marked-up” to 1980. This enables W&A to ascertain those properties constructed between those two dates; W&A will conduct other research to ascertain just those properties constructed during, or prior to, 1972.
3. Conduct sample research on identified subdivisions constructed between 1965 and 1980 to ascertain those with the majority of homes constructed prior to 1972.
4. Review available USGS aerial photographs (available at <http://earthexplorer.usgs.gov/>) and/or purchase select historic aerials for the APE for Morgan, Johnson, and Hendricks counties to augment the data on the topographical maps and county GIS.
5. Identify individual properties constructed between 1955 and 1972 as much as possible prior to survey.
6. Conduct a reconnaissance-level survey to:
  - a. Verify the existence and general status of properties rated Contributing or higher in the previous survey (HPR, 2008),
  - b. Survey properties constructed prior to 1972 in parts of the APE has been expanded since the 2004 survey.
  - c. Take photos with embedded GPS data of properties built between 1955 and 1972 within the original APE (*Survey methodology for these properties is described at the end of this memorandum.*)
7. Update historic context based on new pool of properties.
8. Conduct field visits on properties that may be eligible or that cannot be viewed during the reconnaissance-level survey from public right of way.
9. If necessary, a meeting (including field visit) with the staff of SHPO/ National Register staff will be held to discuss field methodology and/or identification and evaluation efforts, especially as they relate to recent past properties.
10. Prepare an AI Report that will include the following: project description, methodology, historic context update (1955-1972), discussion of APE and changes to integrity of properties identified in the last report, discussion of newly identified eligible properties, discussion of representative newly identified Contributing properties, recommendations/summary, references cited, and appendix items (maps, historic maps, updated properties table, site plans of any eligible properties).
11. Enter Contributing or NRHP-eligible properties into a GIS database, and
12. Conduct a consulting party meeting two weeks after AI Report is released.

### **Methodology for the evaluation of Recent Past (1955-1972) Properties:**

- **Subdivisions and Neighborhoods**

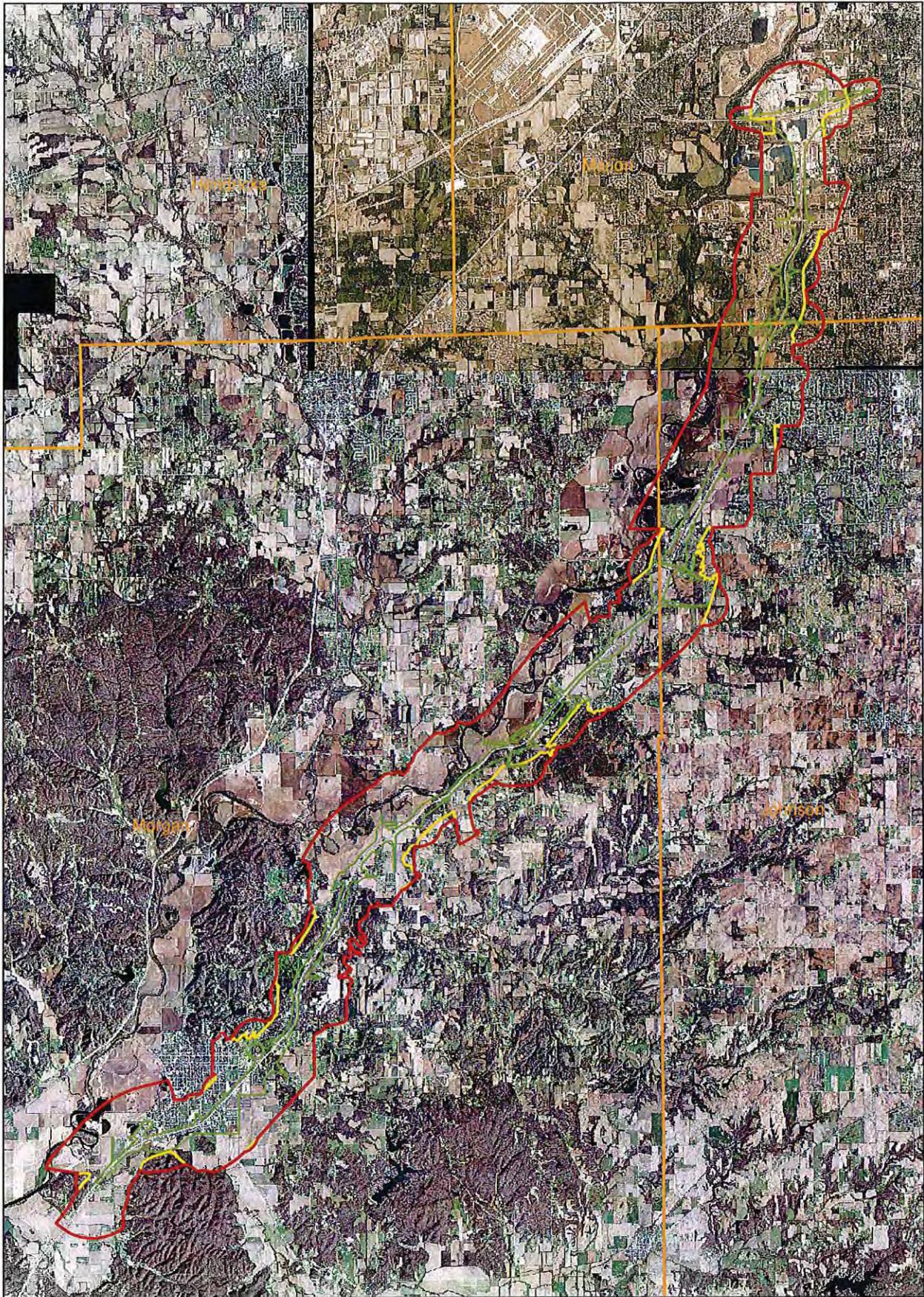
1. Conduct reconnaissance-level survey of subdivisions and neighborhoods (concentrations of similar properties) collectively as a district, generally following the guidelines in 3.C.1 of National Cooperative Highway Research Program (NCHRP) Report 723, “A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing”
  - a. Take representative photos of buildings, streets, and landscape elements within the subdivision
  - b. Make notes on building forms/styles, layout, and design



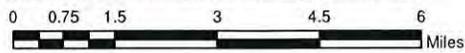
2. Evaluate properties within historic context and using National Park Service (NPS) guidelines for NRHP eligibility
3. Conduct an intensive-level survey of subdivisions or neighborhoods that appear to possess integrity. This may include but not be limited to: establishing a Contributing versus a Non-contributing ratio, conducting background research on the neighborhood/subdivision, its specific architectural style, or its builder/developer, and/or comparing this neighborhood/subdivision to others previously listed in the NRHP in Indiana
4. Recommend neighborhoods/subdivisions with a favorable ratio of Contributing to Non-contributing resources and that possess significance under the NPS evaluation criteria as eligible for listing in the NRHP

• **Individual Resources:**

1. Conduct reconnaissance-level survey of properties constructed from 1955 to 1972 (date of construction ascertained from research prior to reconnaissance-level survey or based on a surveyor's best judgment during reconnaissance).
2. Evaluate properties within historic context, using the NPS guidelines for NRHP eligibility.
3. Recommend properties with a high level of architectural integrity (original materials, workmanship, design, setting, location, feeling, and association) as Contributing to the historic fabric of the larger geographic region.
4. Conduct intensive-level of survey of any Contributing property that appears to possess exceptional integrity and merit NRHP eligibility evaluation. This may include but not be limited to: conducting a site visit, discussing the property with the owner, researching the property/architectural style/architect, and/or comparing this property to similar properties previously listed in the NRHP in Indiana.
5. Recommend properties with exceptional integrity as eligible for listing in the NRHP.



Sources: 2005 Aerial Photo -INDOT via IndianaMap, Counties, ESRI



**I-69 Section 6**  
Proposed Area of Potential Effects

January 26, 2015  
WORK IN PROGRESS  
NOT FOR PUBLIC RELEASE



- Proposed APE January 26, 2015
- Approximate SR 37 Alternatives January 23, 2015
- APE June 18, 2004





**Resource Agency Scoping Meeting Minutes I-69**  
**Section 6**  
**IGCN South Conference Room B**  
**February 17, 2015 at 9 a.m. EDT**

<b>Attendee</b>	<b>Organization</b>
Kenneth Westlake	U.S. Environmental Protection Agency (USEPA)
Virginia Laszewski	USEPA
Karen Bobo	Federal Highway Administration (FHWA)
Julie Dingle	FHWA
Michelle Allen	FHWA
Janice Osadczyk*	FHWA
Eryn Fletcher	FHWA
Rick Marquis	FHWA
Al Ferlo*	Perkins Coie*
Scott Pruitt	U.S. Fish and Wildlife Service (USFWS)
Robin McWilliams-Munson	USFWS
Deborah Snyder	U.S. Army Corps of Engineers (USACE)
Randy Braun	Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ)
Jason Randolph	IDEM OWQ
Jim Sullivan	IDEM Ground Water Division (GWD)
Matt Buffington	Indiana Department of Natural Resources (IDNR) Division of Fish and Wildlife (DFW)
Mitchell Zoll	IDNR Division of Historic Preservation and Archaeology (DHPA)
John Carr	IDNR DHPA
Chad Slider	IDNR DHPA
Wade Tharp	IDNR DHPA Archaeology
John Steinmetz	Indiana Geological Survey (IGS)
Todd Thompson	IGS
Sarah Rubin	Indiana Department of Transportation (INDOT) Project Management (PM)
Kevin Hetrick	INDOT PM
Laura Hilden	INDOT Environmental Services (ES)
Ron Bales	INDOT ES
Marlene Mathas	INDOT ES
Steve Sperry	INDOT ES
Chrystal Rehder	INDOT Ecology and Waterway Permitting
Michael Buening	INDOT Multimodal
Marcus Dial	INDOT Aviation
Patrick Carpenter	INDOT Cultural Resources (CR)



Tim Miller	Lochmueller Group
Michael Grovak	Lochmueller Group
Kia Gillette	Lochmueller Group
Bill Wiedelman	HNTB
Chris Meador	HNTB
Rich Connolly	HNTB

\*via teleconference

The purpose of the scoping meeting was to provide an update to the resource agencies regarding the project and gather their input on the project.

### I. Introductions- FHWA

- A. FHWA introduces the project and welcomes everyone to the meeting.
- B. FHWA is looking forward to working with everyone on the project.

### II. Meeting Purpose – INDOT PM

- A. There will be Co-project managers with INDOT.
- B. INDOT gives a brief up date of the current status of I-69 Sections 1-5. INDOT is getting closer to completing all segments of I-69.
- C. The initial Notice of Intent (NOI) for the Tier 2 was posted in 2004. Since that time, INDOT has focused on completing the Tier 2 EISs for Sections 1-5 and the design and construction of those segments. The Tier 2 DEIS for Section 6 has been on hold since 2008.
- D. INDOT reinitiated the Section 6 Tier 2 EIS by posting a NOI in October 2014. The NOI indicated that the Tier 1 ROD permitted alternatives outside the selected corridor to be considered when necessary to avoid significant impacts within the corridor while still connecting the Tier 2 termini designated in the Tier 1 ROD. Development in the corridor, legislation affecting Perry Township, and the completion of the Indianapolis International Airport Midfield Terminal are three items which could alter the anticipated impacts associated with the project.
- E. USEPA asked for further clarification on the legislation regarding I-69 through Perry Township.
- F. INDOT explains that in 2006 an amendment to Major Moves would prohibit INDOT from using private funding or tolling to construct I-69 through Perry Township in Marion County.
- G. USEPA asks if legislative approval would be needed to build I-69 around Perry Township or build it with traditional funding sources.
- H. INDOT explains that building the road around Perry Township or through it with non-private funding sources may meet the letter of the law; however, INDOT is being respectful of the legislation and will work with the legislature as the project continues.
- I. FHWA adds that this legislation does not force the project to go around Perry Township or use non Public/Private/Partnership (PPP) funding. What it does require FHWA and INDOT to obtain legislative approval of the project prior to determining the



final route and funding source. This legislation came out after the Tier 1 EIS was completed. This legislation is part of why the team is exploring other alternatives, but is not the only reason.

J. INDOT provides an introduction of the project team. Each attendee introduces themselves.

### III. I-69 Project Update-INDOT

A. Describes the general scope of NEPA describing the alternatives analysis process.

B. Provides a description of impact considerations that will be utilized during the alternative screening process.

C. INDOT provides a description of the goals and measurements highlighted in the Tier 1 Purpose and Need and explain the core goals.

D. USEPA asks what the core goals mean.

E. INDOT explains that the core goals were slightly elevated from the rest of the goals although all goals were considered.

F. Lochmueller Group explains that for an alternative to move forward the core goals must all have been met and the alternative needed to “move the needle” in those areas an appreciable amount.

G. INDOT stated that the last document the agencies had seen for Section 6 was the Section 6 Tier 2 goals which were published in 2005. After that the project was put on a temporary hold.

H. INDOT stated that we are requesting additional goals from the agencies.

I. USEPA asked if the project was still looking at personal accessibility from Evansville to Indianapolis.

J. INDOT responded that we are but this Section of the project is more focused on personal accessibility from the southern project termini to I-465.

K. IDNR asked what will constitute the Section 6 study area – will it still be the SR 37 corridor or will it be wider?

L. INDOT responded by stating that this will be discussed later in the presentation.

M. A revised Purpose and Need will be provided in spring 2015.

### IV. I-69 Section 6-Lochmueller Group

A. Lochmueller Group provides a description of the NOI and what is being evaluated in this section.

B. The intent is to get agency and public feedback on what considerations should be taken into account when determining if alternatives outside of the SR 37 corridor will be evaluated.

C. Lochmueller Group describes the new development within and outside the SR 37 corridor that will factor in to the current study and introduces the potentially expanded study area.

D. USEPA asks where Perry Township is in relationship to the study area shown in the figure.



- E. Lochmueller Group provides a description of where Perry Township falls on the map.
- F. IDEM asks for a description of the southern start point of the study area and where the potential deviations from the SR 37 corridor would start.
- G. Lochmueller Group responded that the southern boundary has not been specifically defined nor has where the potential deviations from the SR 37 corridor would start. We are looking for agency input. INDOT states that this study area is potential and subject to comment.
- H. Lochmueller Group describes general project constraints, development in Marion County, some of what we are looking at as potential areas to avoid.
- I. Some of these constraints include Environmental Justice (EJ) communities, White River, wetland complexes, mussels, Indiana bat and northern long-eared bat (NLEB) habitat, managed lands, Southwestway Park, and IDNR fish hatcheries. Lochmueller provides a general location of some of these resources.
- J. IDNR DHPA asks why the expanded study area does not start south of Martinsville.
- K. Lochmueller Group responded that this study area is draft and subject to change. This study area assumed the Tier 1 corridor (SR 37) would extend north through Martinsville. INDOT could consider a further expansion of the study area.
- L. Lochmueller Group clarifies that the SR 37 corridor will be taken through the alternative screening process regardless of what other alternatives may be developed.
- M. USEPA asks why we need to go outside the SR 37 corridor. What has happened? What is wrong with this corridor?
- N. Lochmueller Group responds that due to the passage of time we feel it would be the most responsible thing to re-evaluate the corridor.
- O. USEPA stated that the remaining sections were evaluated assuming that the I-69 Section 6 would utilize the SR 37 corridor. Any changes here could have affected the decisions made on previous sections.
- P. INDOT responded that there were deviations allowed in the Tier 2 DEIS for the previous sections.
- Q. USEPA asked what are the key changes along SR 37 that warrant the revision to the study area?
- R. INDOT responded by stating that we are looking at additional alignments along with looking at the existing corridor and asking the public for their input.
- S. INDOT adds that looking off alignments is the most responsible thing to do.
- T. USEPA stated that during the Tier 1 study there were several alternatives that were off the SR 37 corridor that were studied. She asked that since these were looked at, why continue to look off alignment.
- U. INDOT, with the help of Lochmueller Group responded by stating that there were off SR 37 alignments and that these alignments consisted of an alternative that utilized Mann Road. Additional alternatives other than Mann Road could be evaluated during the next phase.



V. USEPA stated that at the time the Tier 1 ROD was signed that the staying on the SR 37 with some deviation was the best alternative with the lowest impacts to the environment. USEPA asked for more detail about what has changed?

W. FHWA responded that we want to make the right decision. This includes gathering information on what has changed from 2004 to now. The team will be gathering that information. This information will inform our decision making process. The ultimate outcome may not change.

X. IDNR noted that it seems there is a very rough idea of where the alignments may go, have there been alternatives considered that go outside of the study area shown on the map?

Y. Lochmueller Group responded, yes we have generally looked at potential alternatives on and outside of the corridor. We are currently in the process of looking for the alternative that best meet the need of the project.

Z. IDNR DHPA asked if there was any reason why it appears that Martinsville was excluded from the study area. Why does the study area not widen south of Martinsville?

AA. Martinsville was not excluded, this study area may change. At the Community Advisory Committee (CAC) meeting, Martinsville representatives did indicate that they have planned for the interstate to go along SR 37 for a long time.

### V. I-69 Section 6 Schedule

A. Lochmueller Group provides an overview of the NEPA schedule.

B. USEPA asked if we are anticipating conducting wetland work for off SR 37 corridor alternatives.

C. Lochmueller Group responded by stating that we will be conducting windshield survey level studies, determinations, for any off SR 37 corridor and that they will be screened down to the best possible alternatives before any field wetland survey is completed. Wetland determinations will be completed for the current alternatives along SR 37.

D. HNTB added that it is possible that after conducting these wetland determinations and taking into consideration other resources, that off SR 37 alternatives may be screened out prior to any field work being completed.

E. USEPA asks if there will be a 404/NEPA merger process utilized for this project.

F. USACE responded by stating that there is no merger in place in Indiana. USACE then asked if this process could be expedited in any way. Would this project feel political pressure from people on SR 37 who may be upset with the added traffic on SR 37?

G. IDEM stated that having so many stoplights and the increased congestion is likely to cause political pressure. Is it possible that once Section 4 and 5 are open to traffic that would be enough political pressure to drop the consideration of off SR 37 alignments and just move forward with the SR 37 option?

H. Lochmueller Group responded by stating that while off SR 37 corridor alternatives will be considered it is very possible that they could be dismissed or screened out prior to detailed studies, leaving the SR 37 corridor as the best alternative. INDOT added that INDOT is already under pressure to complete this as soon as possible.



- I. HNTB stated that a traffic model will be developed to study the existing and proposed no build traffic condition and that the traffic is likely to worsen after Sections 4 and 5 are opened.
- J. USEPA asked if there are bonds or other funding in place to fund the construction of this segment of I-69.
- K. Lochmueller Group responded that at this time there has not been funding identified for Section 6 but that this is not unusual for other I-69 segments. There were no construction funds for the other I-69 sections but funding was obtained. Construction, mitigation, real estate costs, will be taken into consideration when developing an alternative.
- L. INDOT added that funding has not been identified yet.

### VI. I-69 Public Involvement Opportunities

- A. INDOT provides an overview of the public involvement process that is underway for this project.
- B. USEPA asked if EJ communities were asked to provide input for the project. These communities should be provided a special opportunity to be involved in the process.
- C. INDOT responded that yes, EJ communities were invited through the United Way and there has been no response to date. We will do everything we can do to involve EJ communities.
- D. INDOT explains the role of the CAC and what feedback we have received from them.
- E. USEPA stated that MSATs and children's health are important issues that should be carefully considered.
- F. Lochmueller Group responded by stating that these are all issues that will be given careful consideration.
- G. IDEM stated that the social impacts of the project should be weighed against the natural resource impacts. The public should be reminded that there is an opportunity cost to avoiding the social impacts and those are the natural resource impacts.
- H. INDOT responded by stating that the list of considerations shown is condensed and all impacts will be taken into consideration. INDOT will convey to the public that to make SR 37 limited access significant modifications to the existing facility will be required to incorporate interchanges and overpasses.
- I. USEPA stated that INDOT should have interpreters at these public meetings if it is needed. The also stated that INDOT should really substantiate the studies done for EJ communities.
- J. INDOT and Lochmueller Group responded that in the meeting invite we provided the opportunity for an interpreter if needed and there were no responses received. We are not planning on having an interpreter at this point.
- K. IDNR asks for clarification on the Section 6 study area, specifically, where is the study area? He would like a more defined study area which to provide comments.



- L. Lochmueller Group and INDOT stated that there is still some flexibility of the study area and we are open to revisions/input on where the study are should be.
- M. USEPA asked what is the primary, underlying need of the project. Is NAFTA still a primary need of the project? Is completing the entire corridor from Canada to Mexico still a need?
- N. INDOT responded by stating that the Tier 1 purpose and need are still relevant and applicable to the Tier 2 DEIS. This revision recognizes that there is a 10 year lag and revisions may need to be made.
- O. FHWA added that all we want from the agencies is to identify any concerns the agency has based on what was presented at the meeting. We want to hear from the resource agencies and the public.
- P. USEPA indicated that the Tier 1 study stated that I-69 would use the SR 37 corridor unless there was a significant impact identified on the SR 37 corridor.
- Q. INDOT stated that that is exactly why we are taking such a hard look at the SR 37 corridor to determine if there are impacts that are significant.
- R. IDEM added that the continued development along the corridor is driving the decision to look off the SR 37 alignment.
- S. USACE encouraged INDOT to evaluate wetlands to determine the least environmentally damaging practicable alternative.
- T. IDEM asked how far south the I-65 added travel lane project will extend.
- U. The answer was given that the southern terminus is just south of project. This is documented in the long range transportation plan.

### VII. Questions/Comments

- A. INDOT provides the agencies with contact information for the project managers
- B. Meeting minutes will be provided within a week.

*Details discussed in the meeting are subject to change. This summary is a reflection of the status of these items at the close of the meeting. These meeting minutes represent the understanding of the events that occurred. Please forward any comments or revisions to the attention of Rich Connolly at [rconnolly@HNTB.com](mailto:rconnolly@HNTB.com) or at 317-636-4682.*

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



March 10, 2015

Linda Weintraut, Ph.D.  
Weintraut & Associates, Inc.  
Post Office Box 5034  
Zionsville, Indiana 46077

Federal Agency: Federal Highway Administration ("FHWA")

Re: Meeting minutes, revision to area of potential effects, and methodology of survey for additional information study, pertaining to I-69 Evansville to Indianapolis Tier 2 study: Section 6

Dear Dr. Weintraut:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (recently recodified at 54 U.S.C. § 306108), 36 C.F.R. Part 800, and the "Programmatic Agreement Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana," the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed the enclosures with your letter dated February 5, 2015, and received on February 9, 2015, for the aforementioned project in Morgan, Johnson, and Marion counties in Indiana.

In section III.c.i. of the minutes from the January 13, 2015, meeting at the Indiana Department of Transportation ("INDOT"), there is a reference to my staff's having discussed our "thoughts on eligibility and provided a handout on some of their eligibility guidelines." We take that reference to guidelines to mean the 2014 draft "Guidelines for Evaluating National Register Eligibility of Mid-Century Modern Housing and Post-War Suburbs," which our office had developed earlier. Section III.c.ii. of the minutes says, "After discussion, meeting participant generally agreed with the premise; . . ." Does that mean that FHWA and INDOT have agreed to adopt those guidelines, as we had requested at the meeting? If not, then we would renew our request now. We have enclosed a copy of those guidelines with this letter.

Furthermore, in the February 4, 2015, memorandum "Methodology for Section 6 Aboveground Survey & Reporting," Section 1. under the Subdivisions and Neighborhoods part of the Methodology for the evaluation of Recent Past (1955-1972) Properties," we find a citation to the guidelines in 3.C.1. National Cooperative Highway Research Program (NCHRP) Report 723, "A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing." We recall having expressed concern at the January 13 meeting that some aspects of those guidelines oversimplify the analysis. As indicated above, we had asked that our draft "Guidelines for Evaluating National Register Eligibility of Mid-Century Modern Housing and Post-War Suburbs" be followed, as well.

In regard to archaeological resources within the proposed project area, it is our understanding that information pertaining to proposed methodologies for windshield survey and for archaeological predictive modeling to be implemented during the archaeological reconnaissance survey for this project will be provided to the DHPA for its review and approval prior to implementation in the field. Once this information is received, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.

The January 26, 2015, proposed area of potential effects ("APE") for all effects on above-ground properties is acceptable, subject to later revisions that would be reasonable or necessary. It is our understanding that examples of possible later revisions could include narrowing the APE where the alignment is on SR 37 and no overpasses or

interchanges would be built (see sections III.a.iv. and vi. in the January 13 minutes), widening the APE in areas where access to properties (which could include historic properties) might be affected by the new construction and limiting access to I-69 (see section III.a.iv. in the January 13 minutes), and extending the APE if one or more new terrain alternatives will be studied (see section III.a.vi. in the January 13 minutes).

In all other respects, we agree with the discussion at the January 13 meeting, as recorded in the minutes and in the "Methodology for Section 6 Aboveground Survey & Reporting."

If you have questions regarding our comments on surveying Mid-Century Modern housing and post-World War II suburbs, please contact Paul Diebold at (317) 232-3493 or PDiebold@dnr.IN.gov. Questions about other aspects of the above-ground survey and about the APE should be directed to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeology should be directed to Wade Tharp at (317) 232-1650 or WTharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Evansville to Indianapolis Tier 2 Study: Section 6 (Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:WTT:wtt

Enclosure

- cmc: Michelle Allen, Federal Highway Administration, Indiana Division (with copy of enclosure)  
Sarah Rubin, Indiana Department of Transportation (with copy of enclosure)  
Kevin Hetrick, Indiana Department of Transportation (with copy of enclosure)  
Laura Hilden, Indiana Department of Transportation (with copy of enclosure)  
Patrick Carpenter, Indiana Department of Transportation (with copy of enclosure)  
Mary Kennedy, Indiana Department of Transportation (with copy of enclosure)  
Shann Miller, Indiana Department of Transportation (with copy of enclosure)  
Shirley Clark, Indiana Department of Transportation (with copy of enclosure)  
William Wiedelman, P.E., HNTB Corporation (with copy of enclosure)  
Christine Meador, HNTB Corporation (with copy of enclosure)  
Rich Connolly, HNTB Corporation (with copy of enclosure)  
Jason DuPont, P.E., Lochmueller Group (with copy of enclosure)  
Timothy Miller, Lochmueller Group (with copy of enclosure)  
Kia Gillette, Bernardin, Lochmueller Group (with copy of enclosure)  
Connie Zeigler, Bernardin, Lochmueller Group (with copy of enclosure)  
Kyle Boot, Lochmueller Group (with copy of enclosure)  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc. (with copy of enclosure)  
Beth McCord, Gray & Pape, Inc. (with copy of enclosure)

Indiana DNR - Division of Historic Preservation & Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, IN 46204  
October 2014

## Guidelines for Evaluating National Register Eligibility of Mid Century Modern Housing and Post-War Suburbs

Increasingly, consultants in the field and preservation planners are finding a need to evaluate post-war suburbs and housing types. The need is sometimes practical, as Section 106 calls for agencies and those utilizing Federal funds, or undertaking licensed activities, to evaluate the impact on historic areas. In other cases, communities hope to identify previously overlooked historic resources.

The following guide is intended as a framework to assist in evaluating the potential eligibility for the National Register of Historic Places, for areas that may have concentrations of Ranch housing. For the most part, these resources date from the 1941-1970 time period. While the National Register of Historic Places, Criteria for Evaluation (see sidebar) are the basis for any opinion of eligibility, this document is intended to specifically apply the criteria to post-war architecture. In all cases, DHPA will consult with you to provide a final assessment of eligibility.

(sidebar section)

### The National Register of Historic Places Criteria for Evaluation

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

#### Criterion A

That are associated with events that have made a significant contribution to the board patterns of our history.

#### Criterion B

That are associated with the lives of persons significant in our past.

#### Criterion C

The embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components lack individual distinction.

#### Criterion D

That have yielded, or may be likely to yield, information important in prehistory or history.

### Criteria Considerations

Ordinarily cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

A: A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

B: A building or structure removed from its original location but which is primarily significant for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

C: A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building associated with his or her productive life; or

D: A cemetery that derives its primary importance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

E: A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

F: A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

G: A property achieving significance within the past 50 years if it is of exceptional importance.

(end sidebar section)

#### Mid Century Modern and Ranch House Historic Districts

Criterion A – districts that have close association with patterns of history or development trends.

Districts that are eligible will have many of these qualities:

- 1) They have a distinct place in the history of the development of the community (e.g., “one of the first,” “one of the best,”) to implement a type of development.
- 2) They can be linked to particular significant developer, builder, or planner in a significant way (e.g. “one of Mr. Smith’s best examples of a cul-de-sac ranch house development”)
- 3) They reflect design trends in a significant way in a community, such as cul-de-sacs, the “rural lane,” common setbacks, acreage of yards, plantings, or other collective community building guidelines described or set forth in writing at the time.
- 4) They may have a set of guidelines or mechanism to control aesthetics, such a peer design review committees, deed restrictions, etc.
- 5) They may have been planned for a particular socio-economic or even ethnic group that had an impact on a community (G.I.s, areas like Flanner House Homes in Indianapolis, or factory housing).

#### Criterion C

Mid Century Modern or Ranch house districts that are eligible should have a distinct core of superior-design homes or buildings:

- 1) The “core” may be difficult to quantify in percentage, but, visually, has a decided impact on the aesthetics of the area or neighborhood as one walks or travels through the area.
- 2) The core of significant houses reflect tenets of Modernism or other design trends in a substantial way.
- 3) The core and other houses are architect or master builder-designed.

- 4) The core houses have a high level of physical integrity.
- 5) The district as a whole has a minimum of typical, stock designs
- 6) The district can be quantified as at least locally significant, compared to similar areas within the community.

#### Individual listings for Mid Century Modern and Ranch Housing

DHPA expects individually eligible houses to embody Modernism or other facets of post-war design in a clearly distinguishable manner:

- 1) Individually eligible buildings will be architect or master-builder designed and documented as such (This may not be possible immediately for in-the-field findings, but, should be researched whenever feasible).
- 2) Individually eligible buildings will have a very high level of integrity. No (non-original) siding, no or very few window replacements, and an intact interior.
- 3) Individually eligible buildings probably have architectural refinements and materials that enhance the aesthetics of the property (e.g., Roman brick that enhances the horizontal nature of a ranch design; a marble foyer that reflects the Miesian qualities of an office building).
- 4) Individually eligible buildings reflect tenets of a particular, significant, and scholarly-recognized design idiom to a high degree. While one can list and to some degree quantify elements of such styles, it may be that the design as a whole sufficiently represents its defined idiom.
- 5) Individually eligible buildings should retain a setting, landscaping, outbuildings, or structures that enhance the total design of the property.



April 27, 2015

Mr. Mitch Zoll  
Division Director  
Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 West Washington Street, W274  
Indianapolis, Indiana 46204

Re: I-69 Evansville to Indianapolis Tier 2 Study: Section 6  
Existing SR 37 Right-of-Way Disturbance Documentation Memorandum  
Archaeology Predictive Modeling Methodology Memorandum  
(DES No.: 0300382; DHPA No.: 4615)

Dear Mr. Zoll,

The Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation (INDOT), is conducting Section 106 consultation as part of the I-69 Evansville to Indianapolis Tier 2 Studies, Section 6.

Per the meeting with INDOT and Division of Historic Preservation and Archaeology (DHPA) staff on January 13, 2015, enclosed please find two methodology memoranda for your review and comment. One memorandum explains the methodology for documenting disturbance for the existing SR 37 right-of-way. A memorandum dated 8/26/04 documenting the results of a field visit at that time is also included for reference. The second memorandum explains the proposed methodology for the use of predictive modeling on this project.

If you have any questions please contact Kia Gillette with Lochmueller Group at 317.222.3880 or [kgillette@lochgroup.com](mailto:kgillette@lochgroup.com) or Beth McCord at Gray & Pape at 317.541.8200 or [bmccord@graypape.com](mailto:bmccord@graypape.com).

Sincerely,

Kia M. Gillette  
Environmental Manager  
Lochmueller Group

Enclosures



Emc: Michelle Allen, FHWA  
Patrick Carpenter, INDOT  
Matt Coon, INDOT  
Sarah Rubin, INDOT  
Kevin Hetrick, INDOT  
Bill Wiedelman, HNTB  
Beth McCord, Gray & Pape  
Linda Weintraut, Weintraut & Associates  
Tim Miller, Lochmueller Group

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## MEMORANDUM

**To:** Mitchell Zoll, Office of the State Historic Preservation Officer

**From:** Beth McCord, Gray & Pape, Inc.

**Date:** March 16, 2015

**Re:** Section 6 Alternative Archaeology Methodology

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The memo requests approval for an alternative methodology for the archaeological survey of existing SR 37 right-of-way (ROW) as discussed at the agency meeting January 13, 2015.

### Existing SR 37 Right-of-Way

When the I-69 project Tier II studies were first initiated, a field review of Section 6 along SR 37 was undertaken. This field review was completed on August 26, 2004. The purpose of the review was to determine the extent of disturbance within the existing right of way (ROW). Attendants for the field review included Curtis Tomak (INDOT archaeologist), Tim Miller (HTNB Section 6 Project Manager), Dave Hunter (Wilbur Smith engineer), Pat Trader (University of Kentucky archaeologist for Section 6), and Don Cochran and Alice Roberts (PMC archaeologists). A memo generated from the field visit indicated that, with the exception of a couple of small areas, the existing SR 37 ROW is disturbed (See attachment). The memo was never submitted to Indiana Department of Natural Resources (IDNR) Division of Historic Preservation and Archaeology (DHPA) staff for comment.

The existing ROW is defined as the area owned by the State of Indiana from county GIS data. SR 37 is a divided four-lane highway and the ROW encompasses the north and south bound roads, a grass covered median and grass buffers exterior to the roadway. The buffers typically include visually noticeable ditches and utilities. Most of these disturbances are evident on a review of aerial maps. The extent of the ROW is visually delimited in most locations by fencing or tree lines. The ROW is typically between 55 and 75 meters in width but can be larger at intersections. Beyond the ROW, land use includes residential homes, commercial or industrial development, urban areas or agricultural land.

Upon further verbal consultation with INDOT CRO staff and DHPA staff in March 2015, a field meeting and windshield survey to review existing SR 37 has not been found necessary. The 2004 review found the majority of the SR 37 to be disturbed. Since Phase Ia field surveys will be conducted adjacent to existing SR 37 ROW, disturbances within the existing ROW can be visually assessed at that time. Disturbed areas will not be further investigated. Any areas that do not visually appear to be disturbed within the existing SR 37 will be investigated using standard

Phase Ia methods. Digital photographs will be taken to provide examples of the types of disturbance encountered and will be included in the Phase Ia archaeology report.

If previously recorded sites fall within the existing ROW or if newly identified sites extend into the existing ROW, the site boundary will be investigated to determine the level of disturbance. If intact deposits are encountered, the site will be surveyed using standard survey methods during the field work. In areas with greater than 30% visibility, the site area will be surveyed by pedestrian transects spaced at 5 m intervals. In areas with less than 30% visibility, the site area will be surveyed via the excavation of 30-cm diameter shovel test pits at an interval of 5 m. All excavated soil will be screened through 0.64 cm wire mesh. The results will be included in the Phase Ia archaeology report.

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## MEMORANDUM

**To:** Mitchell Zoll, Office of the State Historic Preservation Officer

**From:** Beth McCord, Gray & Pape, Inc.

**Date:** March 13, 2015

**Re:** Section 6 Alternative Archaeology Methodology

---

The memo requests approval for the use of predictive modeling as discussed at the agency meeting January 13, 2015.

### Predictive Model of Study Corridor

Should multiple alternatives be selected outside of the SR 37 corridor, a predictive model is proposed for a study corridor encompassing the selected alternatives and presumably involves several thousand acres. The predictive model could assist in alternative selection by identifying areas sensitive for cultural resources to be avoided. The predictive model could also be utilized for a more efficient field survey effort by concentrating the survey effort on high probability areas and reducing the effort in locations with a low potential for cultural resources.

The southern portion of Section 6 is located within the Brown County Hills natural region (Homoya et al. 1985). This area lies south of the Wisconsin glaciation and is characterized by deeply dissected uplands with siltstone, shale and sandstone found near the surface. Soils are well drained silt loams with minor amounts of loess.

The northern portion lies in the Tipton Till Plain natural region (Homoya et al. 1985). The Tipton Till Plain is characterized by a mostly un-dissected glacial plain with silt and silty clay loam soils. Several large scale archaeological surveys conducted within the Tipton Till Plain have provided site and artifact density information (Angst 1997; Burkett and Hicks 1986; Cochran 1994; Conover 1988; Cree 1991, Cree et al. 1994; James and Cochran 1985; McCord 2007) (Table 1). Site densities are similar by landform, but appear to be the lowest in outwash plain settings. There is a higher density of artifacts per acre surveyed and artifacts per site on floodplain and terrace landforms. Higher site densities on better drained soils are also documented in the till plain region (Cochran 1994:6, McCord 2007:109). Cochran (1994:6) summarized prehistoric settlement of the till plain region as:

- Dispersed due to dispersed resources, but more intense at focal resources,
- Low in artifact density, and
- Higher site frequency and artifact density on well drained soils.

<b>County</b>	<b>Landform</b>	<b>Acres Surveyed</b>	<b>Sites per Acre</b>	<b>Artifacts per Acre</b>	<b>Artifacts per Site</b>
Marion <sup>1</sup>	Till Plain	40	1.33	1.78	2.367
Hamilton <sup>1</sup>		33	4.71	0.52	2.429
Madison <sup>3</sup>		233	1.32	--	--
Henry <sup>4</sup>		280	4.59	1.05	4.36
Rush <sup>5</sup>		218.7	3.0	6.36	19.04
Jay <sup>7</sup>		173	5.0	1.5	3.3
Marion <sup>1</sup>	Terrace	5	5.0	1.6	8
Hamilton <sup>1</sup>		152.5	2.21	5.16	11.4
Hamilton <sup>2</sup>		87	2.9	5.46	15.83
Madison <sup>3</sup>		259	2.42	--	--
Henry <sup>4</sup>		230	5.23	0.27	18.75
Rush <sup>5</sup>		276	4.06	3.99	16.19
Delaware <sup>6</sup>		70	2.8	0.65	--
Hamilton <sup>1</sup>	Floodplain	8	2.0	1.38	2.75
Hamilton <sup>2</sup>		276	4.76	6.57	34.18
Madison <sup>3</sup>		140	3.11	--	--
Rush <sup>5</sup>		169.3	6.05	12.12	73.28
Delaware <sup>6</sup>		170	1.93	5.50	--
Hamilton <sup>2</sup>	Outwash Plain	106	11.78	--	1.778
Henry <sup>4</sup>		100	5.00	1.35	3.7
Delaware <sup>6</sup>		100	2.04	0.65	--

<sup>1</sup>Cree 1991, <sup>2</sup>McCord and Cochran 2003, <sup>3</sup>Conover 1988, <sup>4</sup>Burkett and Hicks 1986, <sup>5</sup>Angst 1997, <sup>6</sup>Cree 1994, <sup>7</sup>James and Cochran 1985

Archaeological predictive models are tools for projecting known settlement patterns into unknown areas and assume that archaeological sites tend to recur in environmental settings favorable to human settlement (Warren and Asch 2000:7). A predictive model would consider environmental factors that are assumed to influence human habitation, both for pre-contact and historical periods. For the Tipton Till Plain region, previous recorded archaeological information can be used to help refine the predictive model.

The four main environmental criteria considered for this predictive model would include landform, soil drainage, distance to streams or other water bodies and proximity to roads primarily for historical era sites. The model would be constructed in ArcGIS using existing datasets. Data is readily available for soils from the Soil Survey Geographic (SSURGO), surface landforms from the Quaternary Geological Map compiled by the Indiana Geological Survey, water information from the National Hydrological Dataset and National Wetlands Inventory, and roads from various base map files available from ESRI.

The criteria and proposed sampling method for the proposed probability model is presented in Table 2. Once the study area is selected, a model will be constructed in ArcGIS. The model will be constructed with either the ArcGIS Predictive Analysis Tools (Query Factor Input Table and Query Expression Editor) or ModelBuilder. These ArcGIS tools allow for statistical calculations based on minimum distance algorithms. The model will first be constructed using only the

environmental criteria. Each environmental factor will be partitioned and can be easily added, deleted or weighted to test the model in ArcGIS. The model will be evaluated and validated with the introduction of known site and non-site data. DHPA has provided shape files for recorded cultural sites. The site locations will be checked for accuracy and survey locations will be digitized during the literature review. To further validate and select the appropriate model, Kvamme's Gain Statistic (1-[% area/% known sites]) will be utilized (Kvamme 1988). If the Gain is near 1, the model will have predictive utility. The final model and mapping will be provided to INDOT CRO and DHPA staff for approval prior to use in field work.

Site Probability	Soil Drainage	Landforms	Distance to Water	Distance to Roads	Recommended Survey Interval (Surface/STP)
Low	Very Poor, Poor Moderately Poor	Till Plain, Outwash Plain, Lake Plain, Flood Plain	> 400 m	> 400 m	20/30 m
Moderate	Moderately Well, Well	Till Plain, Outwash Plain, Residual Upland	> 300 m	> 300 m	15/20 m
High	Moderately Well, Well, Very Well	Flood Plain, Outwash Terrace, Dune	< 300 m	< 300 m	10/15 m

A description of the final predictive model and its application will be included in the Phase Ia archaeology report. The report will include an assessment of the field results and determination for the effectiveness of the model. If applicable, correlations between cultural remains and features of the environment will be proposed for different cultural manifestations.

## References Cited

Angst, Michael G.

1997 Rush County, Indiana: Predicting the Potential for Surface and Subsurface Archaeological Sites. Reports of Investigation 46. Archaeological Resources Management Service, Ball State University.

Burkett, Frank M. and Ronald Hicks

1986 Archaeological Investigations of the Upper Big Blue River Glacial Sluiceway. Reports of Investigation 21. Archaeological Resources Management Service, Ball State University.

Cochran, Donald R.

1994 Prehistoric Settlement in the Tipton Till Plain. In, Historic and Prehistoric Contexts in the Tipton Till Plain. Reports of Investigation 36, Archaeological Resources Management Service, Ball State University, Muncie.

Conover, Diana R.

1988 A Reconnaissance Level Survey of the Valley Corridor of the Upper West Fork of the White River in Madison County, Indiana. Archaeological Resources Management Service, Ball State University.

Cree, Donald W.

1991 An Archaeological Database Enhancement Project: A Survey of Hamilton and Marion Counties, Indiana. Reports of Investigation 31. Archaeological Resources Management Service, Ball State University.

Cree, Donald W., Randy Gaw, Gerald Waite, Lisa Paylo and Donald R. Cochran

1994 Historic and Prehistoric Contexts in the Tipton Till Plain. Reports of Investigation 36. Archaeological Resources Management Service, Ball State University.

Homoya, Michael A., Brian Abrell, James R. Aldrich and Thomas W. Post

1985 The Natural Regions of Indiana. *Proceedings of the Indiana Academy of Science*, 94:245-268.

James, Mary Lou and Donald R. Cochran

1985 An Archaeological Survey of Jay County, Indiana. Reports of Investigation 18. Archaeological Resources Management Service, Ball State University.

Kvamme, Kenneth L.

1988 Development and Testing of Quantitative Models. *In Quantifying the Present and Predicting the Past: Theory, Method and Application of Archaeological Predictive Modeling*, edited by W. James Judge and Lynne Sebastian, pp. 325-428. U. S. Department of the Interior, Bureau of Land Management Service Center, Denver, Colorado.

McCord, Beth K.

2007 A Profile of Till Plain Archaeology: A Survey of Hancock County Indiana. Reports of Investigation 36, Archaeological Resources Management Service, Ball State University, Muncie.

Warren, Raber E. and David L. Asch

2000 A Predictive Model of Archaeological Site Location in the Eastern Prairie Peninsula. In *Practical Applications of GIS for Archaeologists: A Predictive Modeling Toolkit*, edited by Konnie L. Wescott and R. Joe Brandon. Taylor & Francis, Inc., Philadelphia.



## MEETING MINUTES

### *Section 6 Project, Section 106 Site Visit*

Various Locations—Marion, Johnson, and Morgan Counties

May 14, 2015 at 8:30 am to 4:00 pm EDT

Des. No.: 0300382; DHPA No.: 4615

Attendee	Organization
Kia Gillette	Lochmueller Group
Paul Diebold	Indiana Department of Natural Resources (IDNR), Division of Historic Preservation and Archaeology (DHPA)
Holly Tate	IDNR, DHPA
John Carr	IDNR, DHPA
Mary Kennedy	Indiana Department of Transportation (INDOT)— Cultural Resources Office (CRO)
Chris Meador	HNTB
Patrick Carpenter	INDOT—CRO
Chad Slider	IDNR, DHPA
Kelly Molloy,	Weintraut & Associates, Inc. (W&A)
Michelle Allen	Federal Highway Administration (FHWA)
Linda Weintraut	W&A
Bethany Natali	W&A

### I. Gather & Site Visit Overview

- The group met in the parking lot at Southport Road & Bluff Road.
- Linda Weintraut explained the purpose of the site visit was to view representative properties from the Additional Information (AI) Study Survey as well as those properties that may be eligible for listing the National Register of Historic Places (NRHP).
- The site visit would also include re-examination of select properties that were originally surveyed in 2004 and evaluated in the Historic Property Report (HPR, 2008) that may now merit re-evaluation.

### II. 6528 Bluff Crest Court

- This Gothic Revival house is set within the Bluff Crest neighborhood off Bluff and Banta Roads. It pre-dates the other residences in the neighborhood, and W&A speculated that it was moved to this location.
- DHPA viewed the house and confirmed the foundation appeared to be a bit newer.
- W&A will contact Indiana Landmarks to see if there is any information about this house.



## Section 6 – Site Visit Summary

### III. Isaac Sutton House (1846 Banta Road):

- Rated Outstanding in the Indiana Historic Sites and Structures Inventory (IHSSI) for Perry Township, Marion County.
- HPR (2008) recommended property not eligible due to the presence of two NRHP-listed Italianate houses in Perry Township and due to the loss of integrity/associated agricultural resources.
- Today, the house displays new windows and an updated porch but still retains its rural setting, even though some of the agricultural buildings are no longer extant.
- The historians asked the group to consider if this property would be eligible today due to the increasingly diminished presence of late 19<sup>th</sup> century agricultural resources on the landscape of southwest Indiana.
- The IDNR, DHPA staff asked for time to consider the property.

### IV. Linear Development along West Stop 11 Road & Belmont Street

- In general, houses along these roads date to the 1960s or early 1970s.
- Houses are situated on large lots (including the majority along or on hills/rises) with high style examples of Ranch or New Traditional residences.
- Historians have not been able to establish a connection at this time regarding the development of these parcels.
- The group visited the following individual properties:
  - 7729 Belmont Street
    - New Traditional/French; built in 1966
    - Set on large lot and sited on hill facing Belmont
    - Early twentieth century barn on site
  - 7719 Belmont Street (Ciel)
    - Constructed in 1964; New Traditional/French with Tudor elements
    - Reportedly the second highest point in Marion County
    - Owned by Charles and Betty Laughner of Laughner's cafeteria
    - Architect was the same who designed the Laughner cafeterias
  - 7835 Belmont Street
    - Constructed in 1966; New Traditional/Classical
    - Some original and some replacement doors and windows
  - 8000 Bluff Street (Entrance on West Stop 11)
    - Constructed circa 1955; Limestone veneer Ranch style

### V. Glennwood Homes Association

- The Glennwood Homes Association (GHA) neighborhood is one of the earliest known, post-World War II residential developments in Marion County. The neighborhood was created in 1949, with most development completed by the 1960s.
- Some later infill (three properties) occurred (circa 1980s and 1990s)
- 26 lots on 46.5 acres, including three “community spaces”



- A cooperative neighborhood started by Lilly Employees (and reportedly given the nickname “Pill Hill”) that reflects some of the trends of Frank Lloyd Wright’s cooperative communities in Michigan.
- The group visited the following individual properties:
  - Sheid House
    - Constructed by Howard F. Foltz (son of Herbert Folt) in 1951 for J.P. Enright
    - Concrete and steel with ashlar veneer
  - Baecke House
    - Built in 1960 entirely of wood; original owner/builder was D.B. Baecke
    - Was part of a separate addition north of the original GHA, but members of this addition eventually joined with GHA
    - Attendees viewed the inside of this house, which retains many original elements.
  - Rice House
    - Constructed circa 1952 in U-shape
    - Most reflective of the “Usonian” house style
    - Garage is somewhat unusual feature but was added (instead of a carport) reportedly at the insistence of the original property owner
  - Shepard House
    - Constructed in 1950 by Howard F. Foltz for Edwin R. Shepard
    - The “sister house” of the Sheid House
    - Concrete and steel construction
- It was the consensus of the group that this is a district that warrants further investigation and would likely be considered NRHP eligible.

#### **VI. Aldrich Farm**

- Was rated Notable in the IHSSI and recommended not eligible for listing in the NRHP in 2004-2008 study due to the removal of outbuildings and additions to the house.
- The farm still has its barn (in good condition) and smaller field patterns near the farmstead; it is evocative of 19<sup>th</sup> century agriculture.
- The house has additions that are generally not visible from the road; it does have a Craftsman porch.
- The historians postulated that this property would be considered for NRHP eligibility given the diminishing presence of farmsteads on the landscape.
- IDNR, DHPA would like time to consider this property and to talk internally.

#### **VII. St. Martin of Tours**

- The church was constructed in 1962; the complex includes a cemetery, additional church buildings and a rectory.
- It is not a high-style example; it is constructed of cement blocks faced with brick.
- Since this is a common type, it will not be considered eligible.

**Section 6 – Site Visit Summary****VIII. Suburban Development—Other Examples in the APE**

- Woodcrest Subdivision
  - Constructed in the 1950s and 1960s off of E. Morgan Street, north of Martinsville
  - Generally a neighborhood of traditional Ranch houses with some Contemporary styles interspersed.
  - Following a brief tour of this neighborhood, staff of IDNR, DHPA commented that for this type of resource, it is important to view the neighborhood comprehensively, to think about the development as a whole (setting, lot size, set-back, roadway designs), and to not become overly concerned only with individual resources.
- IDNR, DHPA would like time to consider this property and to talk internally.
  
- Hillview Neighborhood
  - Located off Morgan Street/Old State Road 37 near Reuben Drive
  - Houses in this neighborhood date to the 1960s and 1970s and show a higher number of integrity alterations than the Woodcrest Subdivision.
- IDNR, DHPA would like time to consider this property and to talk internally.
  
- Parkview Neighborhood
  - Located north of E. Harrison Street
  - Houses date to the 1950s and 1960s with some infill; the neighborhood is sited on a rise north of E. Harrison Street with a curving streets and uniform set-backs.
- IDNR, DHPA would like time to consider this resource and to talk internally.
  
- Port Royal
  - Located off of Old SR 37 north of SR 144
  - IDNR, DHPA noted the neighborhood is an example of tract housing.

**IX. Travis Hills**

- Located on the south side of Stones Crossing Road (White River Township, Johnson County)
- Platted in 1962 on 40-acres by Federick Heger
- Five lots on larger parcels clustered on a rise with a curving street; no sidewalks.
- The IDNR, DHPA would like time to consider this resource and to talk internally.

**X. Glens Valley**

- Farm (85411)
  - Inventoried in the IHSSI but was not included in the HPR [Note: since the meeting, historians have discovered that this property was identified as “demolished” in the 2008 HPR.]
  - This farm is a remaining example of a residence/farm from the Glens Valley community, one of two southern Perry Township communities from the 19<sup>th</sup> century.



- The House was, at one time, a post office for the community.
- While it has alterations that would preclude it from being considered eligible under Criterion C, the historians have been looking at Criterion A significance.
- The Glens Valley Methodist Church was constructed in 1962
  - According to a late nineteenth century history of Marion County, the Methodist congregation was the only congregation of Glens Valley, but is not the oldest Methodist congregation in Perry Township,
  - Since the church is a common type, it will not be considered eligible under Criterion C.

**XI. Wrap Up and Next Steps**

- The group discussed consideration of neighborhood integrity over individual buildings for residential neighborhoods
- The AI HPR will include a discussion of the mapping, aerials, and GIS data consulted
- Mid-twentieth century churches should be researched for significance beyond Criterion C.
- The group discussed briefly if it would be appropriate to include a discussion in the AI HPR about neighborhoods that were surveyed, but ultimately considered Non-Contributing or Not Eligible. W&A has photographs and videos of these neighborhoods tied to GIS mapping but it is beyond the scope to discuss Non-contributing resources, individually. A discussion may be included in the “Discussion of the APE” section of the report, if appropriate.
- IDNR, DHPA would like a few days to discuss the integrity and eligibility of the Isaac Sutton House and Aldrich Farm and the subdivisions.
- INDR, DHPA requested photographs of properties in the Woodcrest neighborhood, Travis Hills, Stop 11 & Belmont, and E. Harrison Street neighborhood (Parkview) (Sent via FTP site on May 18, 2015)
- Regarding the German Nurseries along Bluff Road in the area of expanded APE, it would be appropriate to estimate the Contributing to Non-Contributing ratio of properties and note any modern in-fill. This resource type may be appropriate for a Multiple Property Nomination

<b>Action Item</b>	<b>Responsible Party</b>	<b>Due Date</b>
Photographs to DHPA	W&A	Completed May 18, 2015
Contact Indiana Landmarks regarding house on Bluff Crest	W&A	As soon as possible
Comment on visited resources, including NRHP eligibility	IDNR, DHPA	Week ending May 22, 2015
Complete AI HPR	W&A	Late Summer/Early Fall 2015 for Consulting Parties
Invite property owners to join consultation	W&A	Concurrent with publication of AI



Section 6 – Site Visit Summary

		HPR
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*Details discussed in this meeting are subject to change. This summary is a reflection of the status of these items at the close of the meeting.*

*These meeting minutes represent the understanding of the events that occurred. Please forward any comments or revisions to the attention of Linda Weintraut, [linda@weintrautinc.com](mailto:linda@weintrautinc.com) and copy Patrick Carpenter, [pacarpenter@indot.in.gov](mailto:pacarpenter@indot.in.gov).*

**Note: This meeting summary documents ongoing, internal agency deliberations. Accordingly, the information contained in this summary is considered to be pre-decisional and deliberative.**

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



May 15, 2015

Richard J. Marquis  
Division Administrator  
Federal Highway Administration, Indiana Division  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Draft purpose and need statement and conceptual alternatives for I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Mr. Marquis:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*) the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed the aforementioned documents for the project in Morgan, Hendricks, Johnson, and Marion counties in Indiana.

Some of the agency representatives at the April 30, 2015, Resource Agency Meeting #2 asked that the various alternatives being considered for Section 6 of I-69 Evansville to Indianapolis Tier 2 be compared with the Tier 1 alternatives. As my staff understood the request, at least those Tier 1 alternatives that had been carried into the Tier 1 environmental impact statement ("EIS") would be compared at some point during the Tier 2 alternatives study (e.g., the DEIS stage) with the Tier 2 alternatives still under consideration. The other agency representatives expressed uncertainty about why multiple alternatives outside the SR 37 corridor are now being considered for Section 6, when there seemed to be less flexibility in considering new alternatives during the EIS studies of the first five sections of I-69.

We, also, are interested in comparing the Tier 1 alternatives with those of Tier 2 Section 6 but perhaps for a somewhat different reason. It seems obvious to us that a no-build alternative is not viable for I-69 Section 6, because it would result in interstate traffic having to use non-interstate highway (existing SR 37) to connect with the rest of I-69 between Martinsville and Indianapolis. It also seems obvious that I-69 Section 6 must be built through Morgan County and Hendricks County, Johnson County, and/or Marion County, rather than along one of the other, more westerly alignments that was considered in Tier 1, such as US 41/I-70.

However, the I-69 Evansville to Indianapolis Tier 1 Alternative 3C, which was deemed the Preferred Alternative by FHWA and the Indiana Department of Transportation ("INDOT") was not one of the Tier 1 alternatives that was least expensive or had the fewest environmental impacts, yet it was deemed superior to the other alternatives. We think that in the interest of transparency and to demonstrate that Tier 2 will complete the I-69 Evansville to Indianapolis projects in keeping with the expectations of Tier 1, it would be appropriate to compare at least such performance measures as driving time savings and accessibility (and other measures—or impacts—as appropriate) for the Tier 1 Preferred Alternative 3C and the Tier 1 *non*-preferred alternatives that were discarded after the Tier 1 Draft EIS ("DEIS") with the same performance measures for Tier 2 sections 1-5 *plus* each of the alternatives for Section 6 that will be carried into the Tier 2 DEIS. We understand that such distance and cost comparisons will be made *among* the Section 6 alternatives that are thoroughly studied. However, simply comparing the alternatives for Section 6 that are carried to the Tier 2 DEIS would not demonstrate to the resource agencies and the public that the Tier 1 Preferred Alternative 3C ("Evansville-Washington-Bloomington-Martinsville and Indianapolis via SR 37"), in its entirety (all six sections) not only was

*predicted* to be the superior alternative but *actually will be* the superior alternative, once Section 6 is completed, based on whichever Section 6 alternative is selected.

In other words, the projected benefits (driving time saved and accessibility) and perhaps impacts of each of the Tier 2 Section 6 alternatives still under consideration at the time of the Tier 2 DEIS would be added separately to the same projected factors for Alternative 3C for sections 1-5 and compared in a table similar to Table S-9 in the Tier 1 Final EIS, along with the discarded Tier 1 non-preferred alternatives: 1, 2A, 2B, 3A, 4A, 5A, and 5B (see Table S-10 in the Tier 1 FEIS). If some impacts are included, we would be especially interested in seeing projections for impacts on historic sites/districts and archaeological sites, but we realize that other resource agencies would want to see impacts on other kinds of resources included.

Without more information about the locations of the alternative corridors in relation to historic properties, we are unable to offer comments on the relative advantages or disadvantages of any of the conceptual alternatives in regard to foreseeable impacts on historic sites/districts or archaeological sites.

Although we have found paper reports easier to navigate and to mark for comment in the past, we are willing to try eNEPA as a means of reviewing and commenting on documents in the future during the course of the Tier 2 study of Section 6. Because of certain issues—such as our staff reviewers' limited authority to submit comments or difficulty in maneuvering through electronic documents, given our current software—it might turn out that you will continue to receive Indiana SHPO comments in the form of formal, written letters, rather than subject-specific comments submitted at various points by individual reviewers on my staff during their review of various sections of documents.

It also might be the case that most of our comments will be issued during the parallel review process under Section 106 of the National Historic Preservation Act of 1966, as amended, because Section 106 deals exclusively with historic properties and because we anticipate that most reports and findings in the Section 106 process will be submitted to our office on paper. If it proves true that most of the Indiana SHPO's comments are in response to submissions specifically prepared for the Section 106 process, it will be incumbent upon INDOT or its consultants to ensure that those Section 106 comments are taken into account during the NEPA review process, as well.

If there are any future, paper (or compact disc) submissions to the Indiana SHPO for this project, *one copy* would be sufficient, and it may be addressed to me, as follows:

Mitchell K. Zoll  
Deputy State Historic Preservation Officer  
Division of Historic Preservation and Archaeology  
402 West Washington Street  
Indianapolis, Indiana 46204

Other offices of the Indiana Department of Natural Resources, such as that of Matt Buffington in the Division of Fish and Wildlife, should receive their own copy or copies.

E-mail notices of meetings or developments in the review of the project of the availability of documents for review through eNEPA should be sent to *each* of the following:

- Mitch Zoll (MZoll@dnr.in.gov)
- Chad Slider (CSlider@dnr.in.gov)
- Wade T. Tharp (WTharp1@dnr.in.gov)
- John Carr (JCarr@dnr.in.gov).

Please direct questions about above-ground properties (such as buildings and structures) to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeology should be directed to Wade T. Tharp at (317) 232-1650 or WTharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382), please refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:jlc

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
Kevin Hetrick, P.E., Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
William Wiedelman, P.E., HNTB Corporation  
Christine Meador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Jason DuPont, P.E., Lochmueller Group  
Timothy Miller, Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Lochmueller Group  
Kyle Boot, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Department of Natural Resources  
Mitchell Zoll, Deputy State Historic Preservation Officer, Department of Natural Resources  
Chad Slider, Department of Natural Resources  
Wade Tharp, Department of Natural Resources  
John Carr, Department of Natural Resources



Bethany Natali &lt;bethany@weintrautinc.com&gt;

## I 69 Section 6 Site Visits Thursday May 14 - DHPA opinions

1 message

**Diebold, Paul** <PDiebold@dnr.in.gov>

Tue, May 19, 2015 at 4:06 PM

To: Linda Weintraut <linda@weintrautinc.com>, "Carpenter, Patrick A" <PACarpenter@indot.in.gov>, "Kennedy, Mary" <MKENNEDY@indot.in.gov>, "michelle.allen@dot.gov" <michelle.allen@dot.gov>, "Slider, Chad (DNR)" <CSlider@dnr.in.gov>, "Carr, John" <JCarr@dnr.in.gov>, "Tate, Holly" <HTate@dnr.in.gov>, "Borland, Amy" <ABorland@dnr.in.gov>

Cc: "Gillette, Kia" <KGillette@lochgroup.com>, "wwiedelman@hntb.com" <wwiedelman@hntb.com>, Bethany Natali <bethany@weintrautinc.com>, Christine Meador <CMeador@hntb.com>, "Miller, Tim" <TMiller@lochgroup.com>, Kelly Molloy <kelly@weintrautinc.com>, "i-69s6record@hntb.com" <i-69s6record@hntb.com>

We met today, reviewed the ftp photos (thanks) and some of the photos that we took during the site visit, as well as materials submi. ed in 2008 regarding properties in the area. Here are our opinions of the properties:

6528 Bluff Crest Ct: This frame Gothic Revival cottage has some potential, but appears to have been moved to the site. We lack enough context (information-wise) to decide if this house is eligible for the NR.

Isaac Sutton House, 1846 Banta: Due to the alteration of the porch, and the construction of non-contributing buildings on the parcel, we believe that this property has lost sufficient integrity, so as to be ineligible for the NR.

Stop 11 – Belmont district: We believe that this area lacks any common development history or pattern to be considered a district. We would recommend that the large estates near and including the Laughner property be researched to see if they might be individually eligible under Criterion A or B. We do believe that the house at 8000 Bluff Rd. has sufficient architectural interest to be considered eligible for the NR. Mainly, we believe that the builder/architect's inventive use of the site and building materials created a well-crafted example of a Ranch house in the case of 8000 Bluff Rd.

Glennwood Homes: We believe that the Glennwood Homes area, including the NW end of the development which was a separate neighborhood at f rst, to be eligible for the NR as a historic district. We believe that Glennwood Homes meets Criteria A (community development, social history) and C (good examples of Modernism).

Aldrich Farm: We believe that the Aldrich Farm is eligible for the NR. The boundary should include the pastures adjacent to the barn (between the barn and house), probably to the tree line to the west, depending on legal parcels. DHPA views the property as a farm that has evolved over time; the barn and porches on the house are part of the historic development of the farm. Therefore, we do not believe that the porches detract greatly from the eligibility of the property. The house itself retains a preponderance of its Italianate massing and detail.

St. Martin of Tours: DHPA felt that this was a fairly unremarkable example of post-war religious architecture.

Woodcrest: We do not believe Woodcrest has sufficient signif cance to be identif ed as an eligible district.

Hillview: We do not believe Hillview has sufficient signif cance to be identif ed as an eligible district.

Parkview: We do not believe Parkview has sufficient signif cance to be identif ed as an eligible district.

Port Royal: We do not believe Port Royal has sufficient signif cance to be identif ed as an eligible district.

Travis Hills: We believe that this small development is eligible for the NR as a historic district.

Glenn's Valley properties: The farmhouse and barn (#85411) are too altered to be NR eligible. DHPA staff felt that the Glenn's Valley ME Church was a fairly unremarkable example of post-war church architecture.

I think that wraps up nearly everything that we toured last Thursday. Thanks for the information and for organizing the tour. It was a real treat and very helpful to be able to have the level of access to the properties that you (Linda et al.) arranged.

**PAUL C. DIEBOLD**

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ASSISTANT DIRECTOR OF PRESERVATION SERVICES | **INDIANA DNR - DIVISION OF HISTORIC PRESERVATION & ARCHAEOLOGY** | 402 W. WASHINGTON ST. RM W274, INDIANAPOLIS IN 46204  
| P: [317.232.3493](tel:317.232.3493) | F: [317.232.0693](tel:317.232.0693) | [www.in.gov/dnr/historic](http://www.in.gov/dnr/historic) | FIND US ON FACEBOOK | *Discover the real Indianapolis!* [www.nps.gov/history/nr/travel/indianapolis](http://www.nps.gov/history/nr/travel/indianapolis)

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Cameron F. Clark, Director

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



May 26, 2015

Kia M. Gillette  
Environmental Manager  
Lochmueller Group  
3502 Woodview Trace, Suite 150  
Indianapolis, Indiana 46268

Federal Agency: Federal Highway Administration ("FHWA")

Re: A memorandum on existing SR 37 right-of-way disturbance documentation (McCord 3/16/2015) and a memorandum on archaeology predictive modeling methodology (McCord, 3/13/2015) for I-69 Evansville to Indianapolis Tier 2 study: Section 6

Dear Ms. Gillette:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, et seq.), the staff of the Indiana State Historic Preservation Officer has reviewed the aforementioned documents that were submitted under your April 27, 2015, cover letter, which we received on April 29, for the aforementioned project in Morgan, Hendricks, Johnson, and Marion counties in Indiana.

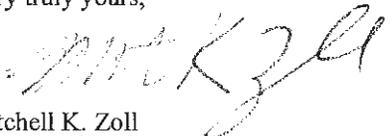
We agree that the area (Section 6, along SR 37) which was examined on August 26, 2004 is disturbed and as such will not require archaeological investigation unless deemed necessary in the field during an investigation to be conducted in adjacent areas.

We also agree with the use of a predictive model for developing survey methods to address the archaeology within Section 6.

Questions about archaeology should be directed to Mitch Zoll at (317) 232-3492 or [mzoll@dnr.in.gov](mailto:mzoll@dnr.in.gov) or Wade Tharp at (317) 232-1650 or [WTharp1@dnr.in.gov](mailto:WTharp1@dnr.in.gov).

In all future correspondence regarding the I-69 Evansville to Indianapolis Tier 2 Study: Section 6 (Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,

  
Mitchell K. Zoll  
Deputy State Historic Preservation Officer  
MKZ:JLC:mkz

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarab Rubin, Indiana Department of Transportation  
Kevin Hetrick, P.E., Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation

Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
William Wiedelman, P.E., HNTB Corporation  
Christine Meador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Jason DuPont, P.E., Lochmueller Group  
Timothy Miller, Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Lochmueller Group  
Kyle Boof, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Department of Natural Resources  
Mitchell Zoll, Deputy State Historic Preservation Officer, Department of Natural Resources  
Chad Slider, Department of Natural Resources  
Wade Tharp, Department of Natural Resources  
John Carr, Department of Natural Resources

## Gillette, Kia

---

**From:** Rubin, Sarah <SRubin@indot.IN.gov>  
**Sent:** Tuesday, June 30, 2015 3:36 PM  
**To:** CLARK METTLER, MARTHA; SULLIVAN, JAMES; Braun, Randy; RANDOLPH, JASON; Buffington, Matt; Zoll, Mitchell K; Carr, John; Slider, Chad (DNR); Tharp, Wade; 'jsteinm@indiana.edu'; 'tthomps@indiana.edu'; 'Deborah.D.Snyder@usace.army.mil'; 'scott\_pruitt@fws.gov'; 'robin\_mcwilliams@fws.gov'; 'Westlake.Kenneth@epamail.epa.gov'; 'Laszewski.Virginia@epamail.epa.gov'; 'Willie\_Taylor@ios.doi.gov'; 'cam\_sholly@nps.gov'; 'John\_R.\_Hall@hud.gov'; 'david.m.frank@uscg.mil'  
**Cc:** HETRICK, KEVIN; 'michelle.allen@dot.gov'; 'Rick.Marquis@dot.gov'; Miller, Tim; 'William Wiedelman'; '(I-69S6Record@HNTB.com)'; 'karen.bobo@dot.gov'; 'eryn.fletcher@dot.gov'; 'julie.dingle@dot.gov'; 'Janice.Osadczyk@dot.gov'; 'cmeador@hntb.com'; 'rconnolly@hntb.com'; Grovak, Michael; Gillette, Kia; Hilden, Laura; Carpenter, Patrick A; Bales, Ronald; Mathas, Marlene; Dial, Marcus; Sperry, Steve; Rehder, Crystal; Buening, Michael  
**Subject:** RE: I69 S6 - Preliminary Alternatives  
**Attachments:** I-69 S6 Preliminary Alternatives Map.pdf; I69 S6 - Preliminary Alternatives Press Release 6-30-15.pdf

All:

This afternoon we will be issuing a press release about the refinement of the conceptual alternatives to preliminary alternatives. A copy of the press release and the map of preliminary alternatives are attached for your reference.

We are also issuing our 'Preliminary Alternatives Selection Report', press release and map via our website [http://secure-web.cisco.com/1X2\\_WP\\_lveFLouYdPeKogYY4JwQO-50iZoZaf6H4qIJED1HKSAGPvM15\\_UmnUNXwX7e4-DEU-ByYxmA4J80EERNUo1nnfw-jjFfr4XAERC2gqfgcLA4ZVFZgiY\\_DNzNuk4AFkSD8cVAJu0G780PZkpVupES5fnB9uFzBEGxCFRjXd51OD1bs3CG-5WqeEv-/http%3A%2F%2Fwww.i69indyevn.org](http://secure-web.cisco.com/1X2_WP_lveFLouYdPeKogYY4JwQO-50iZoZaf6H4qIJED1HKSAGPvM15_UmnUNXwX7e4-DEU-ByYxmA4J80EERNUo1nnfw-jjFfr4XAERC2gqfgcLA4ZVFZgiY_DNzNuk4AFkSD8cVAJu0G780PZkpVupES5fnB9uFzBEGxCFRjXd51OD1bs3CG-5WqeEv-/http%3A%2F%2Fwww.i69indyevn.org). This report explains the process and information used to screen to the preliminary alternatives. We still plan to issue the Alternatives Screening Packet for your review this fall.

Best,  
Sarah

**Sarah Rubin**  
*Deputy Director of Public-Private Partnerships*  
*Project Manager, I-69 Section 6*  
**Office:** (317) 234-5282



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



July 30, 2015

Richard J. Marquis  
Division Administrator  
Federal Highway Administration, Indiana Division  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Preliminary Alternatives for the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis  
(HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Mr. Marquis:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer has reviewed the aforementioned document, which we received by e-mail from Sarah Rubin of the Indiana Department of Transportation on June 30, 2015, for the project in Morgan, Hendricks, Johnson, and Marion counties in Indiana.

Thank you for providing the information on the Preliminary Alternatives. The "Preliminary Alternatives Selection Report for Tier 2, Section 6 (Martinsville to Indianapolis) of the I-69 Evansville to Indianapolis Project, June 30, 2015)" explains that only sites (presumably meaning individual properties) and districts that already have been listed in the National Register of Historic Places within a 400-foot-wide footprint for each alternative were considered in winnowing the Conceptual Alternatives down to the smaller group of Preliminary Alternatives. Because the preparation and submission of an application to have a property nominated for listing in the National Register is usually a voluntary activity, it tends to be the case that within an area as large as a civil township, the numbers of properties that have been listed in the National Register (if any) typically represent only a fraction of the properties that would be eligible for listing. Table A-2 states that no National Register listed properties were found. One cemetery was identified in each of three Conceptual Alternatives: D, F1, and F2. Cemeteries often are of interest to archaeologists, historians, or architectural historians, but they generally are not considered eligible for the National Register, except in unusual cases, such as where they contain very early burials in the history of that community or where they display unusual artistry. Alternative D is the only one of the three alternatives containing a known cemetery that is being studied further as a Preliminary Alternative, but impacts or the lack thereof on cemeteries were not mentioned as disadvantages or advantages in Appendix E. Consequently, we surmise that impacts on historic properties played no role in the winnowing of alternatives that has occurred to this point.

The schematic information that has been provided so far about the locations of four of the five Preliminary Alternatives is not specific enough to enable us to draw any conclusions about impacts to above-ground properties (such as buildings and structures) or to archaeological resources that might be eligible for inclusion in the National Register of Historic Places. Although we have considerably more information about above-ground properties within and along the corridor for the Tier 1 Selected Alternative (C) than we have about the other four alternatives, it is our understanding that the surveys of properties in or along that corridor are ongoing. Accordingly, we do not have any specific comments to offer about any of the Preliminary Alternatives at this time, and we are unable to draw any conclusions about which alternatives might result in either more or fewer impacts to historic properties.

The "Preliminary Alternatives Selection Report" indicates that the results of previous surveys of above-ground properties and archaeological resources, as well as windshield surveys, will be used to identify and evaluate historic properties during the analysis of the Preliminary Alternatives. Investigations of that level of intensity should be fairly helpful in identifying at least those above-ground properties that are most likely to be eligible for the National Register. However, previous archaeological surveys have examined only a fraction of the State of Indiana and any given county, and windshield surveys are unlikely to identify many potentially significant archaeological sites. We hope that sufficient flexibility has been built into the alternatives to allow for avoidance of at least direct impacts on any historic properties that may lie within or nearby them.

We have been advised that responses to our comments in our May 15, 2015, letter on the Draft Purpose and Need statement and the Conceptual Alternatives will be provided at a later date. We need not repeat those comments here, but we look forward to receiving responses

Please direct questions about above-ground properties to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeology should be directed to Wade T. Tharp at (317) 232-1650 or WTharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382), please refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:WTT:wt

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
Kevin Hetrick, P.E., Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
William Wiedelman, P.E., HNTB Corporation  
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Jason DuPont, P.E., Lochmueller Group  
Timothy Miller, Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Lochmueller Group  
Kyle Boot, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Department of Natural Resources  
Mitchell Zoll, Deputy State Historic Preservation Officer, Department of Natural Resources  
Chad Slider, Department of Natural Resources  
Wade Tharp, Department of Natural Resources  
John Carr, Department of Natural Resources



# REVIEW REQUEST SUBMITTAL

State Form 55031 (7-12)  
Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



**Please complete this form and attach it to front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review.**

Date: October 15, 2015

Is this a new submission?       Yes       No

Reference for previous submittals: DHPA # 4615      Des. No. 0300382

### **THIS REVIEW REQUEST SUBMITTED BY:**

Name: Linda Weintraut

Company/Organization: Weintraut & Associates, Inc.

Address: PO Box 5034, Zionsville, Indiana

Telephone number: 317-733-9770      Email address: linda@weintrautinc.com

### **PROJECT NAME & LOCATION** *[Please attach a map with location(s) marked]*

Project Name/Reference: I-69 Tier 2 Studies: Section 6      Project/ Des # 0300382

Project Address/Location: SR 37 from south of SR 39 to I-465

City: \_\_\_\_\_ Township(s): \_\_\_\_\_

County/Countries: Morgan, Johnson, Marion

### **STATE OR FEDERAL AGENCY INVOLVEMENT**

Agency: Federal Highway Administration      Program: \_\_\_\_\_

Type of funds, license, or permit to be obtained *(if applicable)*: \_\_\_\_\_

Name(s) of Agency Contact: Michelle Allen

Address: 575 North Pennsylvania Street, Room 254, Indianapolis, IN 46204

Telephone number: 317-226-7344      Email address: michelle.allen@dot.gov

### **APPLICANT (if different than Federal Agency) if available, please attach copy of authorization letter from federal agency**

Applicant: Indiana Department of Transportation

Name of Contact: Patrick Carpenter

Address: 100 North Senate Avenue, IGCN 642, Indianapolis, IN 46204

Telephone number: 317-233-2061      Email address: pacarpenter@indot.in.gov

**CONSULTANT FOR THE APPLICANT OR AGENCY (IF APPLICABLE)**

Consultant: HNTB

Name of Contact: Christine Meador

Address: 111 Monument Circle, Suite 1200, Indianapolis, Indiana 46204

Telephone number: 317-636-4682 Email address: CMeador@hntb.com

**Contact for DHPA questions regarding this review request:** Christine Meador, Linda Weintraut

Comments:  
Enclosed is the invitation to join consultation for this project along with a list of individuals, groups, and organization invited to join consultation.

***Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:***

- Full contact information for person/entity submitting form, including phone number and email (if available)
- Map of project location with project area(s) clearly marked (provided in current or previous submission)
- Clear photographs of project area and surroundings
- Project description
- Description of any proposed ground disturbance
- Name of Federal agency/agencies and program providing funds, license, or permit
- Letter of authorization from Federal agency/agencies (if applicable)

**Return this Form and Attachments to:**

**Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, Indiana 46204**

**<http://www.in.gov/dnr/historic>**



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

**Indiana Division** 576 North Pennsylvania Street, Room 254  
Indianapolis, IN 46204  
(317) 228-7476

October 15, 2015

In Reply Refer To:  
HDA-IN

Dear Invited Consulting Party,

The Indiana Division of the Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation (INDOT), is preparing an Environmental Impact Statement (EIS) for Section 6 of the I-69 Evansville to Indianapolis Tier 2 Studies. Section 6, which begins at SR 37, south of SR 39 in Martinsville, Indiana, is approximately twenty-six miles in length and will connect to I-465 in Indianapolis.

Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their undertaking on historic properties (both archaeological and structures). Pursuant to 36 CFR 800.2(c), you are hereby invited to be a consulting party to participate in efforts to identify historic properties that may be affected by the undertaking, assess the effects of the undertaking on historic properties, and seek ways to avoid, minimize, or mitigate adverse effects on historic properties. Historic Properties are properties that are listed or eligible for listing in the National Register of Historic Places. The intent of this letter is to provide you an opportunity to become a consulting party by responding to the invitation via the enclosed post card. This invitation is being sent because you were previously a consulting party on this project, are a representative of a historic organization, own a potentially historic property, or are a public official within the project area.

Section 106 for I-69 Section 6 was originally initiated in 2004; however, due to the time that has passed invitations to be consulting parties are being sent out again. For additional information on the Section 106 consultation process please visit the Advisory Council on Historic Preservation's *Protecting Historic Properties: A Citizen's Guide to Section 106 Review* at <http://www.achp.gov/citizensguide.html>.

To facilitate the development of this project, please respond with your returned postcard to this consulting party invitation **within thirty (30) days** from the date of receipt of this letter. We look forward to hearing from you.

For general questions, please contact the I-69 Project Office at 317-881-6408. Tribal contacts for the project are Patrick Carpenter at INDOT ([pcarpenter@indot.in.gov](mailto:pcarpenter@indot.in.gov) or (317) 233-2061) or Michelle Allen at FHWA ([michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or (317) 226-7344).

Sincerely,



 Rick Marquis  
Division Administrator

Enclosure

Emc: INDOT - CRO  
Christine Meador, HNTB  
Kia Gillette, Lochmueller Group  
Dr. Linda Weintraut, Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape

Name	Company	Address	Email	Phone	Fax	Did not respond to invitation	Tier 2 2004 CP	New CP
Tamara Francis, NAGPRA Director	Delaware Nation	PO Box 925 Anadarko, OK 78005	francis@delawarenation.gov	405-247-2449 ext. 1403	405-247-9393		X	
John P. Froman, Chief	Pearla Tribe of Indians of Oklahoma	PO Box 1627 Miami, OK 74355	jfroman@pearlanbo.com	918-540-2835	918-540-2539		X	
Mr. Zachariah Pahnahmie, Chairperson	Prairie Band Potawatomi Nation	Government Center 16261 Q Road Mayetta, KS 66509-6970	zachp@pbnation.org	785-966-4007	785-966-4009		X	
Mr. Ron Sparkman, Chairperson	Shawnee Tribe	PO Box 189 Miami, OK 74355	sparkman@shawnee-tribe.com	918-542-2441	918-542-3922		X	
Mr. George Strack	Miami Tribe of Oklahoma	PO Box 1328 Miami, OK 74355	strack@miamination.com	918-542-1445	918-542-7280		X	
Mark Dollase	Indiana Landmarks-Central Regional Office	1201 Central Avenue Indianapolis, IN 46202	mdollase@indianalandmarks.org	317-639-4534	317-639-6734		X	
Mr. Stewart Sebrea	Indiana Landmarks-Southwestern Regional Office	PO Box 20215 Evansville, IN 47705					X	
Mr. Mark Dollase, Vice President of Preservation Services	Indiana Landmarks-Central Regional Office	1201 Central Ave. Indianapolis, IN 46202					X	
Mr. Marsh Davis, President	Indiana Landmarks-Central Regional Office	1201 Central Ave. Indianapolis, IN 46202					X	
Mr. Greg Sakuta, Director	Historic Landmarks Foundation of Indiana-Southern office	113 West Chestnut Street Jeffersonville, IN 47130					X	
Mr. Tommy Klockner, Director	Historic Landmarks Foundation of Indiana-Western office	609 Ohio Street Terre Haute, IN 47607					X	
Ms. Edith Serra	Owen County CARR/Owen County Preservations	1816 Concord Rd. Gosport, IN 47493	eserra@owncarr.org	812-829-0461			X	
Ms. Joanne Reetz Stuttgart		798 E. Washington St. Marionville, IN 46151	stuttgart@owncarr.org	785-349-1637			X	
Ms. Sandra Tokarski	CARR	PO Box 54 Stanford, IN 47483		812-826-9555	812-826-9555		X	
Mr. Mitch Zoll	IDNR Division of Historic Preservation & Archeology/SHPO	402 W. Washington St. W274 Indianapolis, IN 46204					X	
Mr. John Carr	IDNR Division of Historic Preservation & Archeology/SHPO	402 W. Washington St. W274 Indianapolis, IN 46204					X	
Mr. Tim Maloney	Hoosier Environmental Council	1915 W. 16th Street, Suite A Indianapolis, IN 46202		317-685-8800	317-688-4764		X	
Pauline Spiegel		4410 North Pennsylvania Indianapolis Indiana 46205					X	
Paul Brandenburg	Historic SPANs Task Force	Indianapolis, Indiana 46254		(317) 232-1882				X
Mr. David Baker, Administrator	Indianapolis Historic Preservation Commission	200 East Washington Street City-County Building, Ste 1821 Indianapolis, IN 46204					X	
Mr. David Vanderstel	Merion County Historian	4415 Broadway Street Indianapolis, IN 46205					X	
James Cooper		628 East Seminary Street Greencastle, IN 46135					X	
Dr. Francis Parker	Professor of Urban Planning-Ball State University	Architecture Building (AB), Room 327 Ball State University Muncie, IN 47306		765-285-1893			X	
Mayor Robert Howard	Mayor of Southport	6901 Derbyshire Road Indianapolis, IN 46227		317-783-3685				X
Jon Kay	Traditional Arts Indiana	804 North Fess Avenue Bloomington, Indiana 47408		812-855-0418	812-855-4008		X	
<b>Morgan County</b>								
Joe Mills, President	Morgan County Historic Preservation Society	P. O. Box 1377 Marionville, IN 46151		765-349-1637			X	
Joanna R. Stuttgart	Morgan County Historian	798 E. Washington St. Marionville, IN 46151		(765) 349-1637				X
Anita Zike, President	Morgan County History and Genealogy Association	P.O. Box 1012 Marionville, IN 46151		(765) 342-0391				X
Morgan County Commissioner	Morgan County Commissioner	180 South Main Street Marionville, IN 46151					X	
<b>Johnson County</b>								

Max Fitzpatrick	Johnson County Historian	875 Smock Drive Greenwood, IN 46143						X
Lyman Synder, President	Johnson County Historical Society/Johnson County Museum of History	155 North Main Street Franklin, IN 46131		317-346-4600				X
Ms. Eva Shiley	Hillard Lyons Trust Company	500 West Jefferson Street, Suite 700, Louisville, Kentucky 40202						X
Mr. Brian Baird, Chairman	Board of Commissioners	86 West Court Street Franklin, IN 46131						X
[REDACTED]								
Brehob Nursery Inc.		4316 Bluff Road Indianapolis, IN 46217						X
Mega Properties, LLC Attn: Paul Schlegel		705 Sprague Road Indianapolis, IN 46217						X
Pepper & Proctor Real Estate LLC 1/2INT & Paul W II & Carlean Pepper & Mary S & Ronald G Kochoer 1/2INT		4855 Allan Drive Carmel, IN 46033						X
Evelyn Novicki Trust and Trustees		4800 Bluff Road Indianapolis, IN 46217						X
Lane Bluff LLC		241 N Pennsylvania Street, Ste 300 Indianapolis, IN 46204						X
Scott Greenhouse LLC		3527 W 700 S Trabalgar, IN 46161						X
Brehob Nursery Inc.	Wegehoff House & Nursery	4320 Bluff Road Indianapolis, IN						X
Julie and Ryan Gettum	Brehob House	4310 Bluff Road Indianapolis, IN 46217						X
Mark and Anne Blodreau	Glenwood Homes Association HD & Beecke House	7838 Timber Hill North Drive Indianapolis, IN 46217						X
Melvin and Catherine Adrook	Shepard House	2028 Timber Hill Trail Indianapolis, IN 46217						X
Henry and Mary Scheld	Enright House	1810 Timber Hill Trail Indianapolis, IN 46217						X
Jeffrey and Beth Line	Rice House	7802 Timber Hill Drive Indianapolis, IN 46217						X
Raymond and Linda Plonkewek		4508 Fairhope Drive Indianapolis, IN 46237						X
Todd Blyma and Beth Dillman		8782 Travis Place Greenwood, IN 46143						X
Kent and Kelly Fights		8717 Travis Place Greenwood, IN 46143						X
Jerome and Linda Sue Koester		6771 Travis Place Greenwood, IN 46143						X
Jerry D. and Karen Y. Rumble		6799 Travis Place Greenwood, IN 46143						X
Charles F Laughner	"Le Clef"	7719 Belmont Avenue Indianapolis, IN 46217						X
Jerry L. Barnett	Cleary-Barnett House	8000 Bluff Road Indianapolis, IN 46217						X
City of Indianapolis, Department of Parks and Recreation Glenns	Glenns Valley Nature Park Retreat House	200 E Washington Street, Suite 2301 Indianapolis, IN 46204						X
Lonnie and Marcia Smith	Reuben Aldrich Farm	7020 Old SR 37 Martinsville, IN 46161						X
Innovative Construction Services Inc.	John Sutton House	865 N. Bluff Road Greenwood, IN 46142						X
Ozark Fisheries Inc.	Grassyfork Fisheries	1100 Ozark Fisheries Rd Stouland, MO 65587						X
M. Duane and C. Dean Leonard	Top Notch Farm	851 E. Mahalaville Road Martinsville, IN 46161						X
Ginger Fitzpatrick	W.E. Nutter House	1088 E. Hamison Street Martinsville, IN 46161						X

<b>Consultants</b>			
William Wiedelman	HNTB	111 Monument Cir #1200, Indianapolis, IN 46204	
Christine Meador	HNTB	111 Monument Cir #1200, Indianapolis, IN 46204	
Ms. Kia Gillette	Lochmueller Group	3502 Woodview Trace, Suite 150 Indianapolis, Indiana 46268	<a href="mailto:kgillette@blainc.com">kgillette@blainc.com</a>
Beth McCord	Gray & Pape	5807 N. Post Road, Indianapolis, IN 46216	<a href="mailto:bmccord@graypape.com">bmccord@graypape.com</a>
Dr. Linda Weintraut	& Associate	PO Box 5034, Zionsville, IN 46077	<a href="mailto:linda@weintrautinc.com">linda@weintrautinc.com</a>
<b>INDOT</b>			
Mr. Patrick Carpenter	INDOT-CRO	642 Indiana Government Center North, Indianapolis, IN 46204	
<b>FHWA</b>			
Ms. Michelle Allen	FHWA	Room 254, Federal Office Bldg 575 N. Pennsylvania St. Indianapolis, IN 46204	<a href="mailto:Michelle.Allen@dot.gov">Michelle.Allen@dot.gov</a>

----- Forwarded message -----

From: <[michelle.allen@dot.gov](mailto:michelle.allen@dot.gov)>

Date: Mon, Oct 26, 2015 at 11:28 AM

Subject: I69 Consulting Party

To: [smiller@indot.in.gov](mailto:smiller@indot.in.gov), [pacarpenter@indot.in.gov](mailto:pacarpenter@indot.in.gov), [SRubin@indot.in.gov](mailto:SRubin@indot.in.gov), [linda@weintrautinc.com](mailto:linda@weintrautinc.com)

Cc: [MKENNEDY@indot.in.gov](mailto:MKENNEDY@indot.in.gov)

All,

I received a call from Kelsey Noack Myers, Tribal Archaeologist with the Chippewa Cree, who confirmed they would like to be a consulting party for the I69 Project.

Also, Shaun---Kelsey mentioned that the mailings has her listed as "Mr." and Alvin's was also addressed to "Mr. Boy" instead of Mr. Windy Boy. Can you check the spreadsheet columns to make sure they match up correctly? It's probably in the auto generated last names and headers that we need to make sure they are correct.

Thanks,

Michelle Allen

FHWA-IN

--

Linda Weintraut, Ph.D.  
Weintraut & Associates, Inc.  
PO Box 5034  
4649 Northwestern Drive  
Zionsville, Indiana 46077  
[317.733.9770](tel:317.733.9770) ext. 310

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

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Cameron F. Clark, Director

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



November 4, 2015

Richard J. Marquis  
Division Administrator  
Federal Highway Administration, Indiana Division  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Invitation to become a consulting party and list of invited parties for the I-69 Tier 2 Studies for Section 6, from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Mr. Marquis:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer has reviewed the aforementioned document, which we received by e-mail from Sarah Rubin of the Indiana Department of Transportation on June 30, 2015, for the project in Morgan, Johnson, and Marion counties in Indiana.

Thank you for providing us with a list of parties who have been invited to participate in the Section 106 consultation on this federal undertaking. We noticed that the only local government contacts identified in Marion County are the mayor of Southport, the administrator of the Indianapolis Historic Preservation Commission ("IHPC"), and the City of Indianapolis Department of Parks and Recreation (as owner of the Glenns Valley Nature Park Retreat House). We did not see the Indianapolis Metropolitan Planning Organization on the list. However, we realize that the administrator of IHPC may have been designated to represent all other City of Indianapolis and Marion County governmental interests. We did not see any governmental official from the City of Martinsville on the list, but perhaps none of the alternatives under consideration would cross the city limits of Martinsville, or perhaps the Board of Commissioners of Morgan County, which has been invited, would represent the City's interests.

In addition to including John Carr and me on your list of agency contacts for the Indiana State Historic Preservation Officer, please also include Chad Slider (317-234-5366 or CSlider@dnr.in.gov) and Wade T. Tharp, (317-232-1650 or WTharp1@dnr.in.gov).

Please direct questions about above-ground properties to Mr. Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeology should be directed to Mr. Tharp.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,

Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:jlc

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
William Wiedelman, P.E., HNTB Corporation  
Christine Meador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Timothy Miller, HNTB Corporation  
Jason DuPont, P.E., Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources  
Mitchell Zoll, Deputy State Historic Preservation Officer, Indiana Department of Natural Resources  
Chad Slider, Indiana Department of Natural Resources  
Wade Tharp, Indiana Department of Natural Resources  
John Carr, Indiana Department of Natural Resources

----- Forwarded message -----

From: **Lisa LaRue-Baker - UKB THPO** <ukbthpo-larue@yahoo.com>  
Date: Wed, Dec 2, 2015 at 9:39 AM  
Subject: Re: Consultation - INDOT  
To: Linda Weintraut <linda@weintrautinc.com>  
Cc: ebird@unitedkeetoowahband.org

It is just 'too close,' I have other commitments already booked. Here's hoping we can consult through email or an individual government-to-government consultation.  
Thank you,

Lisa C. Baker  
Acting THPO  
United Keetoowah Band of Cherokee Indians in Oklahoma  
PO Box 746  
Tahlequah, OK 74465

c 918.822.1952  
ukbthpo-larue@yahoo.com

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Please FOLLOW our historic preservation page and LIKE us on FACEBOOK

----- Forwarded message -----

From: **Miller, Shaun (INDOT)** <[smiller@indot.in.gov](mailto:smiller@indot.in.gov)>

Date: Fri, Dec 11, 2015 at 9:39 AM

Subject: contact info and I69 Section 6 records check report

To: Diane Hunter <[dhunter@miamination.com](mailto:dhunter@miamination.com)>

Cc: "michelle.allen@dot.gov" <[michelle.allen@dot.gov](mailto:michelle.allen@dot.gov)>, "linda@weintrautinc.com" <[linda@weintrautinc.com](mailto:linda@weintrautinc.com)>, "Rubin, Sarah" <[SRubin@indot.in.gov](mailto:SRubin@indot.in.gov)>

Good morning Diane,

Would you prefer correspondence to go to your Ft. Wayne address rather than the Oklahoma Office? I was told that you'd like a copy of the I-69 Section 6 Archaeological Literature Review. The cd containing the report and consulting party invitation letter were sent to the Oklahoma office on November 19<sup>th</sup> or 20<sup>th</sup>. If you have not received this material and would like the cd and letter be sent to you at the Ft. Wayne Office, please respond with the address and our consultant, Weintraut and Associates, will resend the information to you. I also need the address and your current phone number (office, cell or both) to update our Tribal table.

Thank you very much,

Shaun Miller

Archaeological Team Lead

INDOT, Cultural Resources Office

[smiller@indot.in.gov](mailto:smiller@indot.in.gov)

(317) 233-6795

--

Linda Weintraut, Ph.D.  
Weintraut & Associates, Inc.  
PO Box 5034  
4649 Northwestern Drive

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Cameron F. Clark, Director

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



December 21, 2015

Linda Weintraut, Ph.D.  
Weintraut & Associates, Inc.  
Post Office Box 5034  
Zionsville, Indiana 46077

Federal Agency: Federal Highway Administration ("FHWA")

Re: Invitation to the December 7, 2015, consulting parties meeting and "Historic Property Report Additional Information, I-69 Evansville to Indianapolis: Tier 2 Studies, Section 6, State Road 37 Alternatives" (Natali, Selm, and Weintraut, 9/2/2015 (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Dr. Weintraut:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C. § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer has reviewed the Indiana Department of Transportation's letter of invitation dated November 19, 2015, and the aforementioned report submitted under your transmittal letter of November 19, 2015, all of which we received on November 20, for the aforementioned project in Morgan, Johnson, and Marion counties in Indiana.

The historic context and the analyses of individual properties and districts in the historic property report additional information ("HPRAI") are well-reasoned and helpful. We appreciate the thoroughness with which the original historic property report (Thayer, 2008), which also was well-reasoned, has been updated in this additional information report.

We agree with the conclusions stated in the HPRAI regarding the eligibility or ineligibility of properties for inclusion in the National Register of Historic Places.

Your November 19 letter indicated that the archaeology report would be sent to us by Gray & Pape, but we can find no record of our having received that report.

We have received a copy of Indiana Landmarks' December 15, 2015, letter to you about the HPRAI. Among other comments, the letter raises an issue regarding the potential for light pollution from I-69 affecting the use of the Goethe Link Observatory, which may be eligible for the National Register. The letter raises a reasonable question about a kind of effect that only occasionally is an issue in highway projects. The potential problem here, as we understand it, is the artificial brightening of the night sky, as distinguished from the casting of artificial light onto buildings or structures on the ground. The historic observatory may be close enough to one or more of the non-State Road 37 alternatives that it should be considered to fall within the area of potential effects ("APE") for one or more of those alternatives. We think that light pollution of this sort from could result from an increase in the number of vehicles or from interchanges or other fixed highway lighting, as well as from foreseeable development along the proposed I-69 (especially at interchanges). It is our impression that light pollution of this sort already is a problem at the Goethe Link Observatory, and the possibility that additional light resulting from the presence of a new interstate highway in the area could further diminish the usefulness of the observatory seems plausible, even if the observatory is located farther from any of the alternative alignments than would justify bringing it within the APE for other kinds of indirect effects, such as visual or audible effects. Indiana Landmarks' letter expressed concern in regard to alternatives B and D but indicated that alternatives K3, K4, and C (which we understand to be what the HPRAI calls the SR 37 Alternatives) might also produce additional light of a kind that could affect the observatory.

We agree with Indiana Landmarks that consideration should be given to whether the APE should in some way be expanded to allow this kind of effect to be taken into account. We realize, however, that Alternative C is probably the least likely of all the Preliminary Alternatives to produce light pollution that would affect use of the Goethe Link Observatory, because Alternative C would keep I-69 farther away from the observatory than the other four.

Please direct questions about above-ground properties to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeology should be directed to Mr. Tharp.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:WTT:JLC:jlc

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
William Wiedelman, P.E., HNTB Corporation  
Christine Meador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Timothy Miller, HNTB Corporation  
Jason DuPont, P.E., Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources, Division of Fish and Wildlife  
Wade T. Tharp, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology  
John Carr, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology



# REVIEW REQUEST SUBMITTAL

State Form 55031 (7-12)

Indiana Department of Natural Resources

Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



**Please complete this form and attach it to front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review.**

Date: 1/4/2016

Is this a new submission?  Yes  No

Reference for previous submittals: DHPA # 4615 Des. No. 0300382

### **THIS REVIEW REQUEST SUBMITTED BY:**

Name: Kia Gillette

Company/Organization: Lochmueller Group

Address: 3502 Woodview Trace, Suite 150, Indianapolis, IN 46268

Telephone number: 317-222-3880 Email address: kgillette@lochgroup.com

### **PROJECT NAME & LOCATION [Please attach a map with location(s) marked]**

Project Name/Reference: I-69 Tier 2 Section 6 Preliminary Alternatives Project/ Des # 0300382

Project Address/Location: Hendricks, Johnson, Marion, Morgan Counties

City: \_\_\_\_\_ Township(s): (Multiple)

County/Countries: Hendricks, Johnson, Marion, Morgan

### **STATE OR FEDERAL AGENCY INVOLVEMENT**

Agency: FHWA Program: \_\_\_\_\_

Type of funds, license, or permit to be obtained (if applicable): \_\_\_\_\_

Name(s) of Agency Contact: Shaun Miller, INDOT

Address: 100 N. Senate Ave, IGCN-Rm. N-642

Telephone number: 317-233-2216 Email address: smiller@indot.IN.gov

### **APPLICANT (if different than Federal Agency) If available, please attach copy of authorization letter from federal agency**

Applicant: \_\_\_\_\_

Name of Contact: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Email address: \_\_\_\_\_

**CONSULTANT FOR THE APPLICANT OR AGENCY (IF APPLICABLE)**

Consultant: same as submitted by

Name of Contact: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Email address: \_\_\_\_\_

**Contact for DHPA questions regarding this review request:** Kia Gillette

Comments:

Enclosed please find a copy of I-69 Tier 2 Studies Evansville to Indianapolis: Phase Ia Archaeological Literature Review; Section 6 Preliminary Alternatives in Hendricks, Johnson, Marion, and Morgan Counties, Indiana. Des. No.: 0300382 (McCord/Baltz, 11/13/2015) for your review and comment.

***Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:***

- Full contact information for person/entity submitting form, including phone number and email *(if available)*
- Map of project location with project area(s) clearly marked *(provided in current or previous submission)*
- Clear photographs of project area and surroundings
- Project description
- Description of any proposed ground disturbance
- Name of Federal agency/agencies and program providing funds, license, or permit
- Letter of authorization from Federal agency/agencies *(if applicable)*

**Return this Form and Attachments to:**

**Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, Indiana 46204**

<http://www.in.gov/dnr/historic>



**T R A N S M I T T A L**

**DATE:** January 4, 2016  
**TO:** Mr. Chad Slider  
Assistant Director for Environmental Review  
Division of Historic Preservation & Archaeology  
Indiana Department of Cultural Resources  
402 West Washington Street, Room W274  
Indianapolis, IN 46204

**ATTENTION:** Mr. Wade Tharp

**WE TRANSMIT:**

Attached       Under Separate Cover       In Accordance With Your Request

**VIA:**

UPS       Overnight UPS       Personal Delivery       Other: USPS

Number of Copies	Date	Description
1	11/13/2015	I-69 Tier 2 Studies Evansville to Indianapolis: Phase Ia Archaeological Literature Review; Section 6 Preliminary Alternatives in Hendricks, Johnson, Marion, and Morgan Counties, Indiana. Des. No. 0300382 (McCord/Baltz, 11/13/2015): DHPA No. 4615

**REMARKS:**

Dear Mr. Slider and Mr. Tharp,

Enclosed for your review and comment is a copy of the archaeological literature report for the above-referenced project.

Please let me know if you have questions.

Sincerely,

Lochmueller Group, Inc.

By: Kia Gillette, Environmental Manager

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Cameron F. Clark, Director

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



February 4, 2016

Kia Gillette  
Environmental Manager  
Lochmueller Group, Inc.  
3502 Woodview Trace, Suite 150  
Indianapolis, Indiana 46268

Federal Agency: Federal Highway Administration ("FHWA")

Re: I-69 Tier 2 Studies: Evansville to Indianapolis: Phase Ia Archaeological Literature Review for Section 6 Preliminary Alternatives, in Hendricks, Johnson, Marion, and Morgan Counties (McCord, and Baltz, 11/13/2015) (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Ms. Gillette:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer has reviewed the aforementioned report submitted under your transmittal letter dated January 4, 2016, and received on January 5, 2016, for the aforementioned project in Hendricks, Johnson, Marion, and Morgan Counties, in Indiana.

Based upon the submitted information and the documentation available to the staff of the Indiana SHPO, we concur with the opinion of the archaeologist, as expressed in the Phase Ia Archaeological Literature Review (McCord, and Baltz, 11/13/2015), that potentially significant archaeological resources occur within the Section 6 study area; and that once the preferred alternative has been chosen, a Phase Ia archaeological reconnaissance survey of the proposed project area should be conducted.

Once the archaeological reconnaissance survey report is received for this proposed project, the Indiana SHPO will resume identification and evaluation procedures for this project. Please keep in mind that additional information may be requested in the future.

Please direct questions about archaeology to Wade Tharp (317) 232-1650 or [wtharp1@dnr.in.gov](mailto:wtharp1@dnr.in.gov). Questions about above-ground properties should be directed to John Carr at (317) 233-1949 or [JCarr@dnr.in.gov](mailto:JCarr@dnr.in.gov).

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,

  
Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:WTT:wtt

Kia Gillette  
February 4, 2016  
Page 2

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
William Wiedclman, P.E., HNTB Corporation  
Christine Mcador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Timothy Miller, HNTB Corporation  
Jason DuPont, P.E., Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Ziegler, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources, Division of Fish and Wildlife  
Wade T. Tharp, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology  
John Carr, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology



# REVIEW REQUEST SUBMITTAL

State Form 55031 (7-12)  
Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



**Please complete this form and attach it to front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review.**

Date: 3/14/2016

Is this a new submission?  Yes  No

Reference for previous submittals: DHPA # 4615 Des. No. 0300382

### **THIS REVIEW REQUEST SUBMITTED BY:**

Name: Kia Gillette

Company/Organization: Lochmueller Group

Address: 3502 Woodview Trace, Suite 150, Indianapolis, IN 46268

Telephone number: 317-222-3880 Email address: kgillette@lochgroup.com

### **PROJECT NAME & LOCATION** *[Please attach a map with location(s) marked]*

Project Name/Reference: I-69 Tier 2 Section 6 Project/ Des # 0300382

Project Address/Location: Morgan County, Indian Creek South of Martinsville to Teeters Road

City: \_\_\_\_\_ Township(s): (Multiple)

County/COUNTIES: Morgan

### **STATE OR FEDERAL AGENCY INVOLVEMENT**

Agency: FHWA Program: \_\_\_\_\_

Type of funds, license, or permit to be obtained (if applicable): \_\_\_\_\_

Name(s) of Agency Contact: Shaun Miller, INDOT

Address: 100 N. Senate Ave, IGCN-Rm. N-642

Telephone number: 317-233-2216 Email address: smiller@indot.IN.gov

### **APPLICANT (if different than Federal Agency)** *If available, please attach copy of authorization letter from federal agency*

Applicant: \_\_\_\_\_

Name of Contact: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Email address: \_\_\_\_\_

**CONSULTANT FOR THE APPLICANT OR AGENCY (IF APPLICABLE)**

Consultant: same as submitted by

Name of Contact: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone number: \_\_\_\_\_ Email address: \_\_\_\_\_

**Contact for DHPA questions regarding this review request:** Kia Gillette

Comments:

Enclosed please find a copy of I-69 Tier 2 Studies Evansville to Indianapolis: Phase Ia Archaeological Survey 1 for Section 6, Indian Creek South of Martinsville to Teeters Road, Morgan County. Des. No.: 0300382 (McCord/Baltz, 2/29/2016) for your review and comment.

***Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:***

- Full contact information for person/entity submitting form, including phone number and email *(if available)*
- Map of project location with project area(s) clearly marked *(provided in current or previous submission)*
- Clear photographs of project area and surroundings
- Project description
- Description of any proposed ground disturbance
- Name of Federal agency/agencies and program providing funds, license, or permit
- Letter of authorization from Federal agency/agencies *(if applicable)*

**Return this Form and Attachments to:**

**Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, Indiana 46204**

**<http://www.in.gov/dnr/historic>**



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 233-6795  
FAX: (317) 233-4929

**Michael R. Pence, Governor**  
**Brandye L. Hendrickson,**  
**Commissioner**

March 23, 2016

In Reply Refer To:  
HDA-IN

Logan Pappenfort (Special Projects Managers/NAGPRA Representative)  
Peoria Tribe of Indians of Oklahoma  
PO Box 1527  
Miami, OK 74355

Dear Logan Pappenfort,

The Indiana Division of the Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation (INDOT), is preparing an Environmental Impact Statement (EIS) for Section 6 of the I-69 Evansville to Indianapolis Tier 2 Studies. Section 6, which begins at SR 37, south of SR 39 in Martinsville, Indiana, is approximately twenty-six miles in length and will connect to I-465 in Indianapolis.

A Phase Ia Archaeological Survey was completed for the portions of the Section 6 alternatives through Martinsville, Indiana. The report documenting the survey findings, Phase Ia Archaeological Survey 1 for Section 6, Indian Creek South of Martinsville to Teeters Road, Morgan County, Des. No. 0300382 (McCord and Baltz, February 29, 2016), is enclosed for your review and comment.

*If you wish to provide written comments, please send them by post to Linda Weintraut, Weintraut & Associates, P.O. Box 5034, Zionsville, Indiana, 46077 or by email to [linda@weintrautinc.com](mailto:linda@weintrautinc.com).*

To facilitate the development of this project, please respond with any comments **within thirty (30) days** from the date of receipt of this letter. We look forward to hearing from you.

For general questions, please contact the I-69 Project Office at 317-881-6408. Tribal contacts for the project are Shaun Miller at INDOT ([smiller@indot.in.gov](mailto:smiller@indot.in.gov)) or (317) 233-6795) or Michelle Allen at FHWA ([michelle.allen@dot.gov](mailto:michelle.allen@dot.gov)) or (317) 226-7344).

Sincerely,

Shaun Miller,  
Cultural Resources Office, Acting Manager



## INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 233-6795  
FAX: (317) 233-4929

**Michael R. Pence, Governor**  
**Brandye L. Hendrickson,**  
**Commissioner**

Enclosure

Emc: INDOT – CRO  
Christine Meador, HNTB  
Kia Gillette, Lochmueller Group  
Dr. Linda Weintraut, Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape

## Gillette, Kia

---

**From:** Earl, James <JEARL@indot.IN.gov>  
**Sent:** Wednesday, March 30, 2016 1:47 PM  
**To:** CLARK METTLER, MARTHA; SULLIVAN, JAMES; Braun, Randy; RANDOLPH, JASON; Buffington, Matt; Zoll, Mitchell K; Carr, John; Slider, Chad (DNR); Tharp, Wade; 'jsteinm@indiana.edu'; 'tthomps@indiana.edu'; 'Deborah.D.Snyder@usace.army.mil'; 'scott\_pruitt@fws.gov'; 'robin\_mcwilliams@fws.gov'; 'Westlake.Kenneth@epamail.epa.gov'; 'Laszewski.Virginia@epamail.epa.gov'; 'Willie\_Taylor@ios.doi.gov'; 'cam\_sholly@nps.gov'; 'John\_R.\_Hall@hud.gov'; 'david.m.frank@uscg.mil'; Thomas, Ashley; Stanifer, Christie  
**Cc:** 'michelle.allen@dot.gov'; 'Rick.Marquis@dot.gov'; 'eryn.fletcher@dot.gov'; 'julie.dingle@dot.gov'; 'Janice.Osadczyk@dot.gov'; 'cmeador@hntb.com'; 'rconnolly@hntb.com'; 'mgrovak@lochgroup.com'; 'kgillette@lochgroup.com'; Timothy Miller; Hilden, Laura; Bales, Ronald; Mathas, Marlene; I-69S6Record@HNTB.com  
**Subject:** I-69 Section 6 - Resource Agency Meeting on PASR

All,

This email message is intended to provide a brief overview of the proposed schedule for the upcoming resource agency meetings with regards to the I-69 Section 6 project. It is anticipated that there will be two separate meetings. The first meeting is scheduled for 4/20 at 9:30 AM ET, and the second meeting is intended to be a field visit within two weeks of the 4/20 meeting.

The meeting on 4/20 will be conducted at HNTB for those that want to attend in person, but we will send out a WebEx invitation shortly before the meeting as well for those that wish to participate remotely. The intent of the meeting on 4/20 is to focus on the Preliminary Alternatives Screening Report (PASR), discuss its findings and any concerns with those findings, identify mitigation opportunities, and plan for the follow-up field meeting to look at the potential mitigation locations as well as any areas of concern that anyone may have. During the meeting on 4/20, we will have a "virtual tour" of the corridor to aid in the discussion and determination of any possible site visits. We will then schedule the follow-up field meeting that will be conducted as a bus tour, so please be aware of your availability during those two weeks (4/25 through 5/6). INDOT would encourage the agencies to provide comments at their earliest possible convenience as the public comment period will conclude on 4/29, but INDOT also understands if the agencies wish to hold on their comments until after the bus tour. INDOT would rather extend that time than have everyone hold comments for the next report. This can be discussed more at the 4/20 meeting.

It is crucial for us to optimize time in the field during the second meeting, and it is necessary to plan it more carefully especially considering the nature of the "field". For the most part, we will be looking at sites along a very busy highway and I want safety to be a major component in how the field tour is planned. INDOT will put together a list of potential sites to visit, and it is anticipated that the agencies will have additional locations of concern. Please bring your list of potential site visits to the meeting on 4/20. Having these discussions in advance on 4/20 will help us plan accordingly to identify locations that are safe to stop. Also, considering the varying complexities of the corridor, it may be necessary to consider more than one day for field visits. I'm hopeful this is not the case, but if there are a number of sites identified, it may not be a bad idea to have everyone visit some sites one afternoon, and the remaining sites the next day. Again, this can be discussed more at the 4/20 meeting.

To prepare for the upcoming meetings, I encourage everyone to [click here](#) to visit the I-69 Section 6 website to view the PASR. The report can be found at the bottom of the page. The report will also be uploaded to the eNEPA site within the next couple of days.

If you have any questions, please don't hesitate to contact me. Thank you, and I look forward to seeing you on 4/20.

Jim

**Jim Earl, P.E.**

***Project Manager***

Indiana Department of Transportation

**Office:** (317) 233-2072

**Cell:** (317) 450-7783

**From:** Diane Hunter [mailto:[dhunter@miamination.com](mailto:dhunter@miamination.com)]  
**Sent:** Tuesday, April 05, 2016 11:43 AM  
**To:** Miller, Shaun (INDOT)  
**Subject:** HDA-IN I-69 Evansville to Indianapolis Section 6

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

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Dear Mr. Miller:

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

After reviewing "I-69 Tier 2 Studies Evansville to Indianapolis Phase Ia Archaeological Survey 1 for Section 6," the Miami Tribe offers no objection to the above-mentioned project at this time, as we are not currently aware of existing documentation directly linking a specific Miami cultural or historic site to the project site. However, as this site is within the aboriginal homelands of the Miami Tribe, if any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966, by email at [dhunter@miamination.com](mailto:dhunter@miamination.com), or by mail at the address listed below to initiate consultation.

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

Respectfully,

Diane Hunter  
Acting Tribal Historic Preservation Officer  
Miami Tribe of Oklahoma  
P.O. Box 1326  
Miami, OK 74355

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Camron F. Clark, Director

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



April 14, 2016

Kia Gillette  
Environmental Manager  
Lochmueller Group, Inc.  
3502 Woodview Trace, Suite 150  
Indianapolis, Indiana 46268

Federal Agency: Federal Highway Administration ("FHWA")

Re: "I-69 Tier 2 Studies: Evansville to Indianapolis: Phase Ia Archaeological Survey 1 for Section 6, Indian Creek South of Martinsville to Tecters Road, Morgan County, Des. No. 0300382" (McCord, and Baltz, 02/29/2016) (DHPA No. 4615)

Dear Ms. Gillette:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C. § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed the aforementioned report submitted under your transmittal memorandum dated March 14, 2016, and received on March 15, for a part of the I-69 Section 6 project, which is proposed to be built in Morgan County, Johnson County, and Marion County; in Indiana.

Based upon the submitted information and the documentation available to the staff of the Indiana SHPO, we concur with the opinion of the archaeologist, as expressed in the archaeological reconnaissance survey report (McCord, and Baltz, 02/29/2016) that archaeological sites 12-Mg-0551, 12-Mg-0552, 12-Mg-0553, 12-Mg-0554, 12-Mg-0555, 12-Mg-0557, and 12-Mg-0558 (all of which were which were identified during the archaeological investigations) are not eligible for inclusion in the National Register of Historic Places ("NRHP").

Additionally, we concur with the opinion of the archaeologist, that there is insufficient information regarding archaeological site 12-Mg-0556 (which was identified during these archaeological investigations; and which, although located outside of the portion of the proposed project area presently surveyed, is likely to be within the portion of the proposed project area next surveyed) to determine whether it is eligible for inclusion in the NRHP. The site should be clearly marked so that it is avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the DHPA for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archeology and Historic Preservation" (48 F.R. 44716).

Furthermore, we concur with the opinion of the archaeologist, that Field 1 of Segment 2 (as indicated in *Survey Coverage Map 3 of 39, Survey Coverage Map 4 of 39, and Survey Coverage Map 5 of 39*) is suitable to contain intact buried cultural deposits, and should be subjected to Phase Ic archaeological investigations.

Moreover, in regard to archaeological site 12-Mg-0525 (which is mentioned on page 25), as previously indicated in our May 26, 2015, letter to Patrick Carpenter (INDOT), we concur with the opinion of the archaeologist, as expressed in the earlier Phase Ia archaeological reconnaissance survey report (McCord, 04/14/2015), that there is insufficient information regarding archaeological site 12-Mg-0525 (which was identified during those archaeological investigations) to determine whether it is eligible for inclusion in the NRHP. However, it is our understanding, from the submission that accompanied that report, that archaeological site 12-Mg-0525 will be avoided by all project-related ground-disturbing activities. Archaeological site 12-Mg-0525 must either be avoided by all project activities, or subjected to further archaeological investigations. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation" (48 F.R. 44716).

Additionally, there is insufficient information regarding archaeological site 12-Mg-0052 (a portion of which was resurveyed during these archaeological investigations) to determine whether it is eligible for inclusion in the NRHP; and it is unclear to us to what extent the entirety of the site has been destroyed by modern development. (We note that the original 1982 archaeological site survey record

indicates not that the site was destroyed, but rather that the area was then being developed.) However, the portions of site 12-Mg-0052 that lie within the proposed project area do not appear likely to contain intact archaeological deposits, and no further archaeological investigations of these portions of the site appear necessary. The site should be clearly marked so that it is avoided by all ground-disturbing project activities. If avoidance is not feasible, then a plan for subsurface archaeological investigations must be submitted to the DHPA for review and comment. Any further archaeological investigations must be done in accordance with the "Secretary of the Interior's Standards and guidelines for Archeology and Historic Preservation" (48 F.R. 44716).

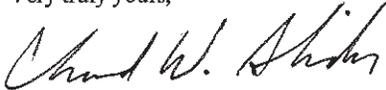
Furthermore, we note the inclusion, as *Appendix A* of the archaeological reconnaissance survey report, of a Phase Ia Interim Report (Anderson, 2006). Please note that we can find no record that we were ever provided with that document (or a final report) for review and concurrence; and, although some of the site records associated with those archaeological investigations have been submitted to the Indiana DHPA SHAARD database system, we have not reviewed the sites for NRHP-eligibility.

Moreover, thank you for entering the archaeological site survey records for sites 12-Mg-0551—12-Mg-0558 into the Indiana DHPA SHAARD database system. They will be reviewed. As a reminder, an archaeological site resurvey record for archaeological site 12-Mg-0052 should be submitted to the Indiana DHPA SHAARD system database.

Please direct questions about archaeology to Wade Tharp (317) 232-1650 or [wtharp1@dnr.in.gov](mailto:wtharp1@dnr.in.gov). Questions about above-ground properties should be directed to John Carr at (317) 233-1949 or [JCarr@dnr.in.gov](mailto:JCarr@dnr.in.gov).

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:WTT:wt

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Janice Osadczuk, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
James Earl, P.E., Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
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Connie Zeigler, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources, Division of Fish and Wildlife  
Wade T. Tharp, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology  
John Carr, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology



**MEETING MINUTES**

**Section 6 Resource Agency Meeting**

HNTB Corporation

111 Monument Circle, Suite 1200

Indianapolis, IN 46204

April 20, 2016 from 9:30 a.m. – 12:30 p.m. EDT

<b>Attendee</b>	<b>Organization</b>
Ken Westlake (via conference call)	USEPA Region 5
Virginia Laszewski (via conference call)	USEPA Region 5
Deb Snyder	USACE
Scott Pruitt (via conference call)	USFWS
Robin McWilliams	USFWS
Jason Randolph	IDEM
Jim Sullivan (via conference call)	IDEM
Matt Buffington	IDNR
Samantha Groce	IDEM
John Carr	IDNR-SHPO
Wade Tharp (via conference call)	IDNR-SHPO
Jim Earl	INDOT
Laura Hilden	INDOT
Ron Bales (via conference call)	INDOT
Janelle Lemon (via conference call)	INDOT
Eryn Fletcher	FHWA
Michelle Allen	FHWA
Kia Gillette	Project Team
Jason DuPont	Project Team
Jenifer Goins	Project Team
Tim Miller	Project Team
Chris Meador	Project Team
Tom Cervone (via conference call)	Project Team
Daniel Townsend (via conference call)	Project Team
Mike Grovak (via conference call)	Project Team
Eric Swickard (via conference call)	Project Team
Al Ferlo (via conference call)	Project Team

- I. Welcome
- II. Introductions
- III. PowerPoint Presentation
  - a. Jim Earl (INDOT) provided an update on the overall status of I-69, Section 6. This included a brief history of how INDOT developed and eliminated project alternatives to retain C1, C2 and C3. He also noted that a Draft EIS is expected to be released in the first quarter of 2017.
- IV. Questions/statements related to the PowerPoint Presentation
  - Q. Do you envision identifying a preferred alternative in the Draft EIS (USEPA)?
    - A. Yes, INDOT will issue a combined FEIS/ROD similar to other I-69 Sections.
  - Q. You indicated Alternative C had strong public support. Is that uniform throughout the corridor or more / less in other areas (USEPA)?



- A. INDOT characterized opposition to other routes (B, D, K3 and K4) as consistently strong.
- Q. Are you aware of the well field located near the SR 144 interchange in Bargersville? There is also one located near the Smith Valley Road and Southport Road interchanges (IDEM).
- A. The project team will note this accordingly. We do have mapped wellhead protection areas and will confirm that what we have is the most current information.
- S. Jim Earl stated that INDOT anticipated the proposed I-69 right of way would be approximately 400 feet. The existing SR 37 right of way encompasses approximately 250 to 300 feet.
- V. Alternatives Fly-Through Questions/Answers or Comments
- Q. Do any Alternatives encroach on a historic bridge?
- A. I-69 is not anticipated to have direct impacts to historic bridges. There are several bridges that are eligible for inclusion on the National Register of Historic Places adjacent to the project corridor. However, at this time we do not anticipate any use of these structures.
- S. Jen Goins explained that C1 is elevated through Martinsville. At Burton Lane, C1 calls for I-69 over Burton Lane. For C2, Burton Lane is over I-69. For C3, there is no grade separation at Burton Lane. There are more commercial impacts for C2.
- Q. Is there any funding for local communities to help upgrade their local road network as a result of I-69?
- A. INDOT will work with local communities to help identify funding assistance.
- S. Ohio Street Interchange – The right of way comes very close to Top Notch farm, a historic property. There are also a mobile home parks west of SR 37. INDOT also noted that this area floods. It might be seen as a benefit to the EJ community to relocate them outside a floodplain.
- S. Grand Valley Boulevard – A grade separation is being considered in this area. It could accommodate cars and pedestrians. South Street will likely need some improvements as it is a very narrow local road without sidewalks. It is important to note that a sidewalk must have logical termini similar to a roadway.
- S. South Street – There is a Section 8 housing development along South Street near Harmon Road. It contains a low income population. Residents have limited transportation options. In Alternative C2, Grand Valley would go over I-69 with a connection to Cramertown Loop. In C3, Grand Valley would also go over I-69, but there would not be a connection to Cramertown Loop. It was noted that the areas around South Street had been identified as a low income neighborhood. Traffic from other areas could use South Street to obtain access to commercial areas on the east side of SR 37. The connection to Cramertown Loop would provide a second access to the SR 252 interchange.
- S. SR 252/SR 44 – A split diamond interchange is proposed in all three Alternatives.
- S. Teeters Road – The historic bridge near the proposed Teeters Road grade separation has been removed by Morgan County. It has been replaced with a modern structure.
- S. Myra Lane – A description of the typical section at Myra Lane was provided.



S. Egbert Road – Meeting participants from the resource agencies would like to see the right of way brought in closer to the mainline at Myra Lane near Clear Creek.

S. Henderson Ford Road – An interchange is proposed at Henderson Ford road for all three Alternatives. All three include an extension to Centennial Road. Local access to New Harmony Road does differ between Alternatives.

S. New Harmony Road – Constructing a new bridge over Stotts Creek here would benefit approximately 3 homes.

S. Cragen Road – Cemetery access options are being investigated to maintain access to the property. The cemetery is maintained by the township trustees.

S. Big Bend Road – All three alternatives provide a grade separation to Tunnel Road.

S. Waverly/Whiteland Road – Alternatives include a grade separation at Waverly Road with none at Whiteland Road or a grade separation at Whiteland Road and none at Waverly Road. A connector road is included east of I-69 for each scenario. Local residents prefer the grade separation at Waverly Road.

S. SR 144 – The mainline transitions to three lanes in each direction to the north to Southport Road. All three interchange configurations are similar in this location.

S. Olive Branch Road – The project team noted concerns raised by a local farmer who harvests land in this area.

S. Fairview Road – Meeting attendees noted utility concerns in this area.

Southport Road – C1 is further from the wellhead. C2 and C3 are within 500 feet. Meeting attendees also noted concerns with the connection in the southeast quadrant.

S. I-465 – The project team identified issues related to the Southside German Market Gardeners Historic District and a potential 4(f) impact.

## VI. Environmental Justice (EJ)

a. Chris Meador stated that INDOT used 2010 census data and the American Community Survey to identify EJ populations. There had been some changes in the census data since the previous study.

b. INDOT reached out to social services along the SR 37 corridor. This included contacting schools, churches and subsidized or low income housing developments. INDOT distributed flyers in advance of the latest Public Information Meeting. It encouraged people to visit the project office and check the project website for more information.

c. INDOT expects to have neighborhood meetings with neighborhoods or other areas where there may be more concentrated low income or minority populations. This includes having meetings at churches or schools. Areas which contain low income populations at a higher percentage than the Community of Comparison (COC) are found throughout the project corridor but are concentrated in central and southern Morgan County. There are only a few minority and limited English proficiency communities which have been identified and those tend to be at the very northern part of the project area.



VII. Mitigation

- a. INDOT would like to begin initiating conversations with USFWS and other resource agencies regarding project mitigation. This includes mitigation for streams, wetlands, forest, riparian resources. At this point mitigation amounts are based on GIS data. As the project is located along the exiting roadway, impacts to existing ditches which demonstrate characteristics of either wetlands or streams will also be included in impact calculations. Impacts and mitigation amounts will be refined as the field data is available.
- b. INDOT would like to combine mitigation into large blocks of land. Specifically, focus areas should include the White River floodplain and landlocked parcels near Stotts Creek.
- c. INDOT would like to know if USFWS is interested in mitigation in the following locations: Waverly Bog, Berean Valley, Ravinia Woods and Blue Heron colony.
- d. INDOT had a mitigation station at the April Public Information Meetings. Many attendees took information sheets and sign-up sheets for the program.

VIII. An Agency Bus Tour is planned for Thursday, May 5.

IX. Adjourn



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## MEETING MINUTES

### DHPA Conference Room April 21, 2016 at 1:30 p.m. EDT

#### Attendees:

- Paul Diebold Indiana Division of Historic Preservation & Archaeology (DHPA), National Register & Survey staff
- John Carr – DHPA/ State Historic Preservation Officer staff
- Mary Kennedy – INDOT-CRO
- Linda Weintraut – Weintraut & Associates

#### **I. Purpose of the Meeting**

- The purpose of the meeting is to discuss a potentially eligible resource that is located within the Area of Potential Effects (APE) that was expanded as a result of design changes and to talk about the status of the Southside German Market Growers Historic District since the group had not visited it during our site visit held last year with the DHPA.

#### **II. Percy House & Clear Creek Hatchery owned by Hess Family (IHSSI 109-386-6005)**

- In order to orient everyone to the property, Weintraut showed the location of the property on project mapping and several photographs of the farm portion of the property and the hatchery.
- Diebold said that he was favorably impressed with the property; he could see the two environments, the farm from the 19<sup>th</sup> century and the fish hatchery that dates to 1934. He could see how the living and working environments connected.
- Diebold indicated that this whole property would be eligible under A and the house alone under C.

#### **III. Southside German Market Gardeners Historic District**

- The portion of the district within the APE is located north and south of I-465, and east and west of Bluff Road. Weintraut showed the group historic aerials from 1962 (before I-465) and from 1972 (end of the study period for this project.)
- The district was identified as eligible for the National Register during the 2015 Additional Information Report and the SHPO concurred. The district is comprised of small field/garden patterns, greenhouses, barns, sheds, and houses.
- Diebold said that he is familiar with the area and he agreed that it exhibits a phenomenon of small truck farms.
- Diebold also noted that I-465 creates a dead zone. He said that there could be a north district and a south district or we could consider it all one district. The group seemed to have a consensus that nothing is gained by dividing it into two districts.



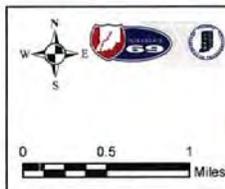
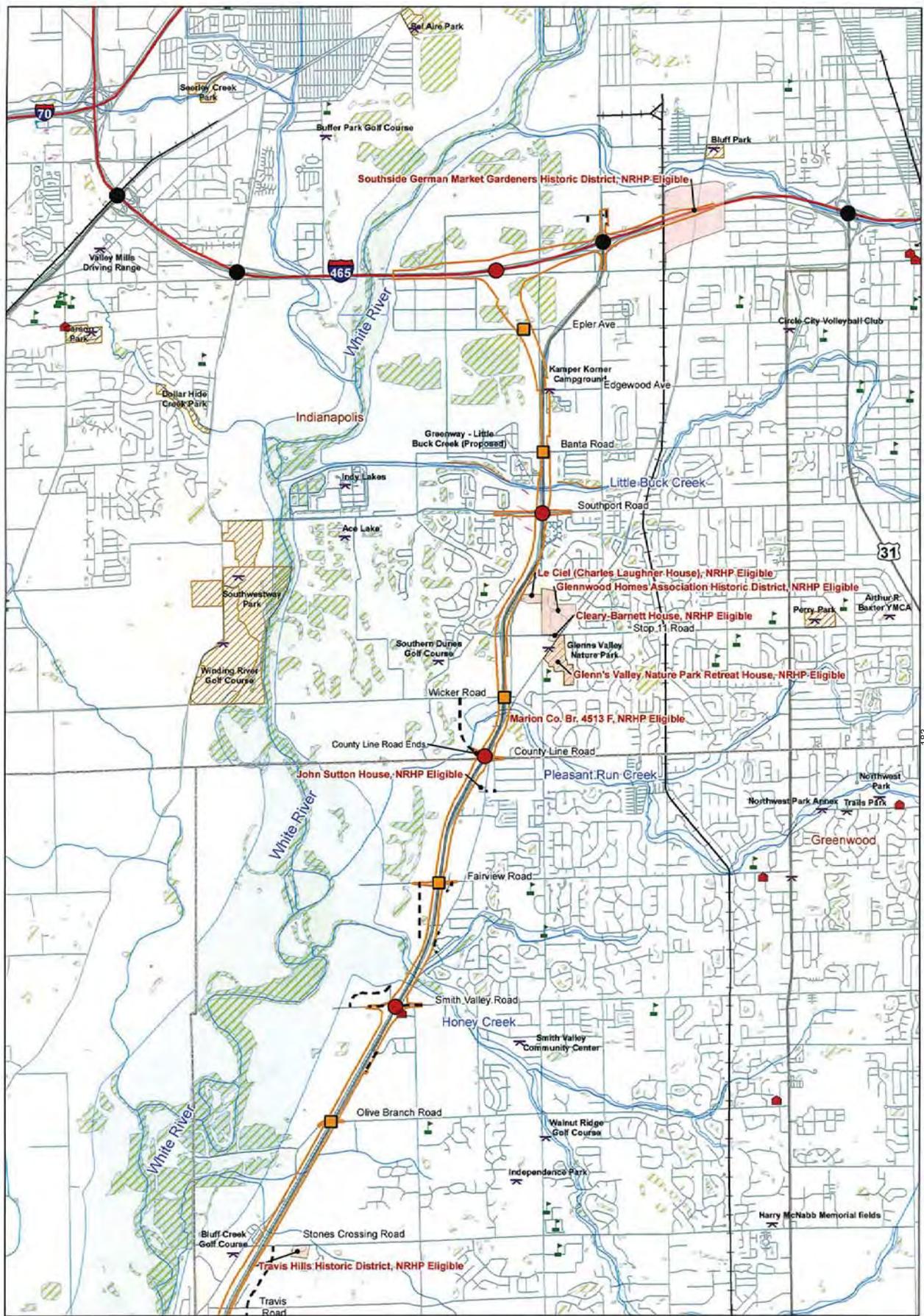
## Section 6 – Document Title

- There is a contributing house in the northeast quadrant that appears to be on the I-465 right of way line. Diebold said that as long as research shows a connection with the market gardeners, the house should be considered contributing. He did not express concern with the fact that the corner of the roof appears to be cut at an angle along the right of way line.

### IV. Next Steps

- A field meeting will be set up with the SHPO reviewer the first week in May to review the Southside German Market Gardeners Historic District as well as some potentially eligible property identified in the second Additional Information Report.
- W&A will review research to verify the historic connection of the contributing house (referenced above) to the Southside German Market Growers Association.

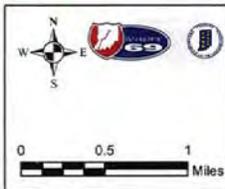
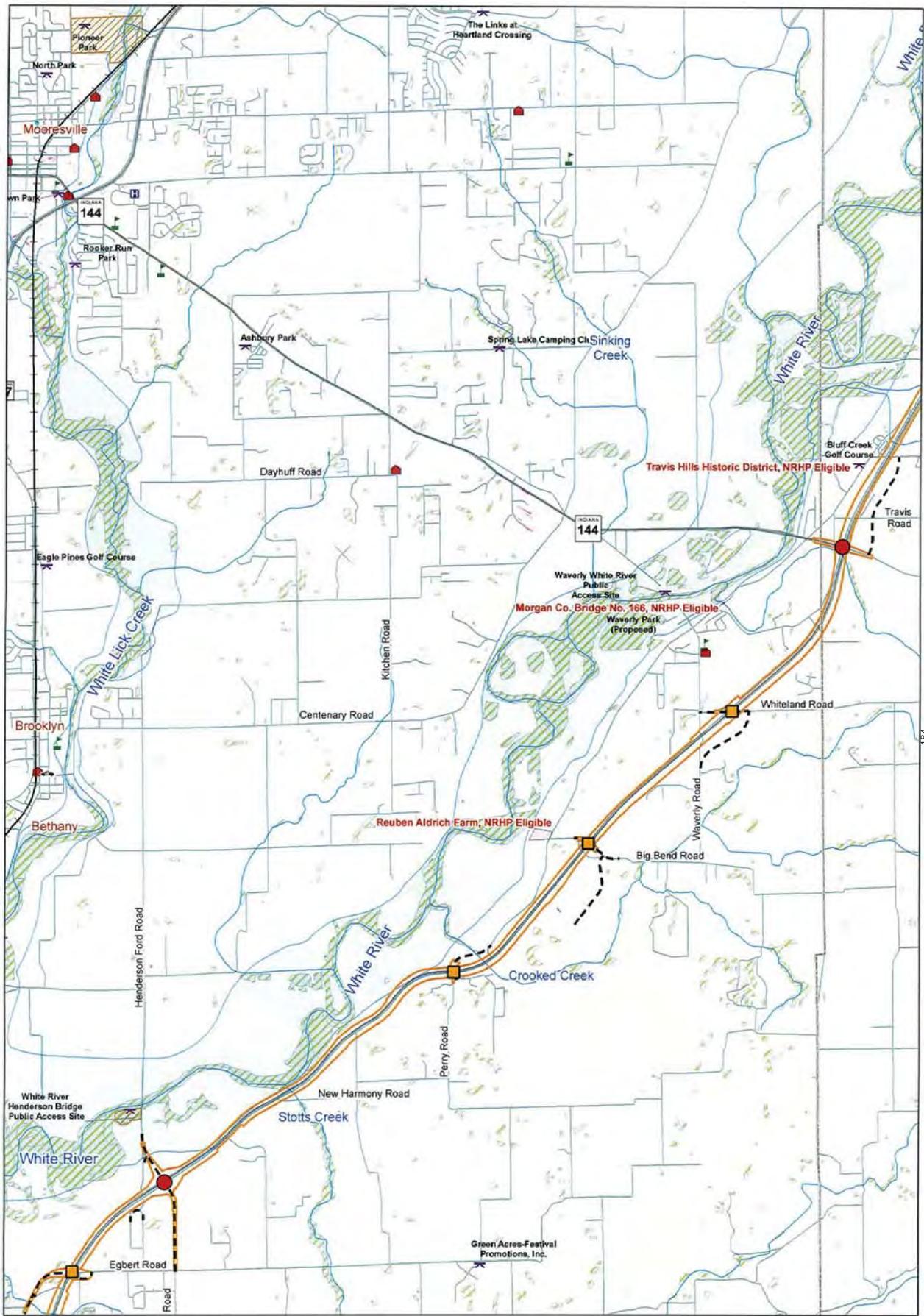
**Note: This meeting summary documents ongoing, internal agency deliberations. Accordingly, the information contained in this summary is considered to be pre-decisional and deliberative.**



Legend		
Alternative C	Interstate Highways	Rec. Facilities
Potential Local Access	US and State Highways	Hospitals
Potential Interchange	Local Roads	Police Stations
Potential Grade Separation	Railroad	Fire Stations
Existing Interchanges	Incorporated Places	Potential Historic Property
	County Line	IDNR Managed Lands
		Forested Area
		Rivers/Streams
		NWI Wetlands
		Floodway
		Floodplain

**I-69 Section 6**  
**Preliminary Alternatives**  
**Alternative C**

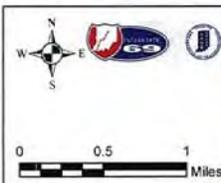
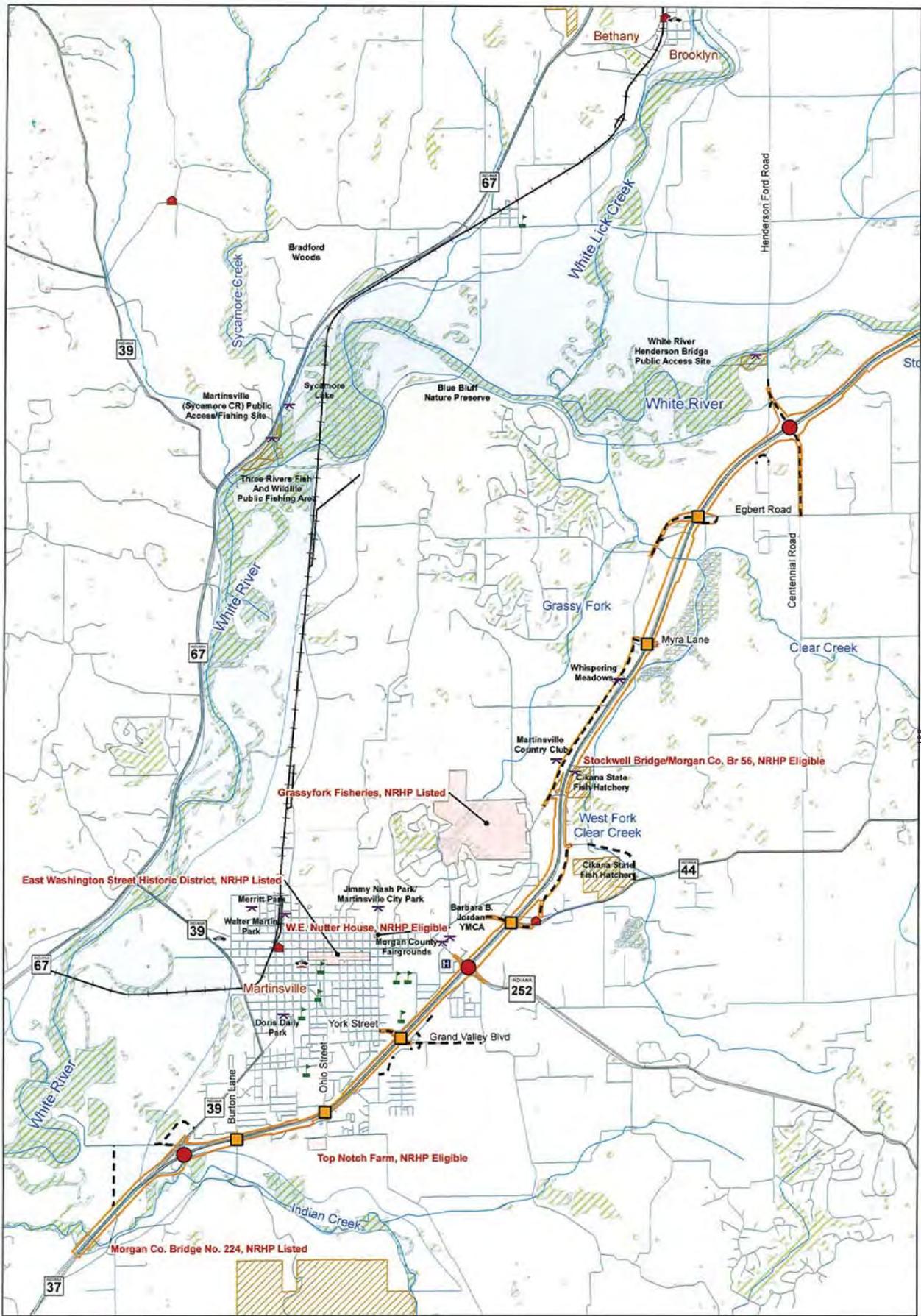
Page 1 of 3



Legend		
Alternative C	Interstate Highways	Rec. Facilities
Potential Local Access	US and State Highways	Schools
Potential Interchange	Local Roads	Rivers/Streams
Potential Grade Separation	Railroad	NWI Wetlands
Existing Interchanges	Incorporated Places	Floodway
	County Line	Floodplain
		Forested Area
		Hospitals
		Police Stations
		Fire Stations
		Potential Historic Property
		IDNR Managed Lands

**I-69 Section 6**  
**Preliminary Alternatives**  
**Alternative C**

Page 2 of 3



Legend			
Alternative C	Interstate Highways	Rec. Facilities	Forested Area
Potential Local Access	US and State Highways	Schools	Hospitals
Potential Interchange	Local Roads	Rivers/Streams	Police Stations
Potential Grade Separation	Railroad	NWI Wetlands	Fire Stations
Existing Interchanges	Incorporated Places	Floodway	Potential Historic Property
	County Line	Floodplain	IDNR Managed Lands

**I-69 Section 6**  
**Preliminary Alternatives**  
**Alternative C**

Page 3 of 3



## MEETING SUMMARY

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### *Section 6 Project: Section 106 Site Visit*

Various Locations—Marion, Johnson, and Morgan Counties

May 2, 2016 at 8:30 am to 3:15 pm EDT

Des. No.: 0300382; DHPA No.: 4615

Attendee	Organization
Patrick Carpenter	Indiana Department of Transportation (INDOT)— Cultural Resources Office (CRO)
Chris Meador	HNTB
John Carr	Indiana Department of Natural Resources (IDNR), Division of Historic Preservation and Archaeology (DHPA), Staff of the State Historic Preservation Officer (SHPO)
Michelle Allen	Federal Highway Administration (FHWA)
Kia Gillette	Lochmueller Group
Mary Kennedy	INDOT—CRO
Tabitha Enyart	HNTB
Linda Weintraut	Weintraut & Associates (W&A)
Bethany Natali	W&A

#### **I. Gather & Site Visit Overview**

- The group met in the parking lot at Southport Road & Bluff Road.
- Linda Weintraut, W&A, explained the purpose of the site visit was to consider effects of the undertaking on historic properties and to consider properties within the expanded Area of Potential Effects (APE) that may be eligible for listing in the National Register.

#### **II. Southside German Market Gardeners Historic District**

- Two Contributing properties within the recommended district have a potential for impact and were discussed in detail: 4401 Bluff Road (Northeast Quadrant of I-465 and Bluff Road), 4425 Bluff Road (Southeast Quadrant). Bethany Natali, W&A, provided background research for 4401 Bluff Road: The parcel was originally 14 acres in the 1920s and included property to the south (4425 Bluff Road). Louis Westhal or Westfall, a fruits and vegetables producer, owned the property in the 1920s and 1930s; his lot had one of highest assessed values in the neighborhood. In later years, the house was occupied by Weimar Pierson, in the trucking industry, Ishmall Ferguson, a florist for Wegehof. In the 1960s, the house was also a project office for the State Highway



Department, likely in connection to the construction of I-465. (A third parcel, 4450 Bluff Road in the southwest quadrant, was discussed later as having a potential for impact.)

- Tabitha Enyart, HNTB, discussed the alternatives under consideration at this location. The I-465 bridge crossing Bluff may need to be raised from 14'2" to 16'6." The profile of I-465 would change and be widened by 1-3 lanes, depending on traffic.
- At 4401 Bluff, a wall may be installed. It would be 25 feet from the house under Alternative C1, and 35 feet from the house under C2 and C3.
- No new right-of-way along Bluff Road is anticipated where I-465 crosses Bluff Road unless the road would be lowered under the existing I-465 bridge to achieve a required bridge height.
- It is unknown if the vegetative barrier would remain. In the worst-case scenario, construction activities would encroach as far as the ditch near the garden between I-465 and the house/driveway.
- The question was raised if a 15 dBA noise increase would occur with the additional lanes and moving I-465 closer to the Contributing house at 4401 Bluff. Noise analysis will be completed for project, including this area.
- At 4425 Bluff Road, the undertaking would require a sliver of property acquisition and acquire a portion of an existing parking lot. A wall would be installed along the interstate but the north drive would remain. The group questioned if visibility from the wall would render the north drive unsafe.
- A wall may be installed near 4450 Bluff Road, in the southwest quadrant. However, it may not be necessary to use a wall along the parcel located at 4450 Bluff Road to avoid impacts to existing structures. There maybe fill slopes which would affect this parcel.
- The group questioned if the walls would perceptibly decrease the amount of noise in the area.
- John Carr, DHPA, asked if right-of-way would be required under all alternatives; Enyart said she would check on the alternatives, but if a fourth lane was not needed on I-465, additional right-of-way may not be required.
- Michelle Allen, FHWA, stated that the right-of-way acquisition would require a 4(f) analysis. If the impacts at this district are adverse, then the 4(f) would not be considered *de minimis*.
- In addition to noise studies, Carpenter asked if lights may impact the property at 4401 Bluff Road.
- Carr noted that the existing interstate was already an intrusion on the district. The undertaking would have an adverse impact on 4401 Bluff Road through the removal of vegetative screening and the imposing nature of the wall close to the house. Impacts to 4425 Bluff Road may not be adverse. The installation of a wall or slope may not make a notable difference to the current setting.
- Carr noted that in the meeting held at the DHPA last week (attended by INDOT and W&A) with Paul Diebold (Survey and Registration Staff), Diebold had said that we could either consider the district as one entity or a north district and a south district. However, there did not seem to be much to be gained by dividing the district into two smaller districts.



- Allen noted FHWA has an initiative to connect communities that have been split by interstates in the past. Carr noted that replacing the interstate with a structure rather than fill and adding sidewalks along Bluff Road would help the neighborhood seem more connected.

### **III. Glennwood Homes Association, Cleary-Barnett House, Glenn’s Valley Nature Park Retreat House:**

- The group then drove southwest on Bluff Road. Weintraut noted that during a field survey in March, historians were able to view a portion of the undertaking from two houses in the Glennwood Homes Association, though tree cover would prevent views in the spring, summer, and early fall. The Cleary-Barnett House and Glenn’s Valley Nature Park Retreat House would not have views to the undertaking. All three properties are greater than 800 feet from the undertaking, so noise modeling would not be used.

### **IV. Marion County Bridge No. 4315F**

- The undertaking would result in the I-69 being somewhat closer to the bridge than it is currently. Pavement widening would be about fourteen feet. The existing cul-de-sac at Bluff Road would be maintained to allow access to the property owners south of the bridge.
- Carr noted that the undertaking would have No Adverse Effect unless it came closer to the bridge than anticipated or if the undertaking would result in the interstate bridge being significantly higher than Marion County Bridge 4315 F.
- Enyart noted that elevation changes between County Line Road and Wicker Road are likely (Wicker will be an underpass).
- Area of concern for SHPO would be: would I-69 be elevated to such an extent that Marion County Bridge No. 4315F could not be viewed to the west. Carr indicated that this might constitute an Adverse Effect.
- Marion County Bridge 4315F is Non-Select and eligible for the National Register of Historic Places (NRHP) under Criterion C.

### **V. John Sutton House**

- There would be some changes to the visual setting.
- Under C2 and C3, Bluff Road would be realigned at its connection to County Line Road (north of the Sutton House). Also, the County Line interchange would be elevated (with either County Line Road or I-69 being elevated depending on the alternative). In two of the alternatives, Bluff Road will be re-aligned to connect with Morris Road due to the inability to maintain Bluff Road at the interchange.

### **VI. Reuben Aldrich Farm**

- The group then drove past the Reuben Aldrich Farm. The undertaking calls for an overpass at Big Bend Road and Tunnel Road. In the winter, there may be a view from this property to the undertaking.



- However, this view would not constitute an Adverse Effect.

## **VII. Top Notch Farm**

- Alternatives C1 and C3 include an interchange at Ohio/ Mahalasville, while Alternative C2 includes a grade separation. The City has requested an interchange at this location. There are two different interchange options that have I-69 at-grade and Ohio/ Mahalasville elevated. Alternative C3, which includes Ohio going over I-69, is the likely layout and would not include roundabouts.
- Local access roads come almost up to the Top Notch property, near the edge of the tree line; however, no right-of-way would be acquired from the property. A realignment of the drive would take place outside the property line. The address of the property would change due to the drive realignment.
- Carr stated that given the modern, existing intrusion at SR 37, there does not appear to be an adverse effect to the this property. The undertaking would effectively replace the existing modern intrusions observed during the site visit, including: a modern storage unit facility on the east side of South Ohio Street and the north side of Mahalasville Road, a modern commercial building, a modern apartment complex beyond it on the west side of South Ohio Street, and the apparent reconfiguration fo the intersection immediately in front of the property’s house. Collectively, these modern intrusions would render an elevated South Ohio over I-69 or an elevated I-69 over South Ohio an insignificant change to the already-extensively-altered setting north of Top Notch Farm.

## **VIII. Morgan County Bridge No. 224**

- Morgan County Bridge No. 224 was closed by the county a few years ago. No overpasses or interchanges are planned near this location. One of the alternatives includes a new bridge crossing of Indian Creek. The anticipated preferred alternative for this area would keep the area as is, with the road remaining closed to traffic and no new bridge. Meador noted that a nearby field could be used for mitigation and the setting could change from agricultural to forest.
- Carr asked if the bridge was too narrow to use. Meador did not know if anyone had looked into the cost of using this bridge. Allen noted that if a bridge bypass is an option, there would need to be a discussion/documentation of why reuse of this bridge would not be an option. Since the project did not close the bridge, it would not cause the adverse effect.
- The group then traveled north on SR 37. Meador explained that the Burton Lane location of the undertaking would have to consider a church, elementary school, and Holiday Inn Express. Environmental Justice concerns were also present along SR 37 near two mobile home communities. A grade separation is planned for Grandview. At the high school, the project would minimize impacts parking areas utilized by the school band. Access to car dealership is another consideration. The project may also require the acquisition of some homes, as the City of Martinsville wants State Road 252 to travel under I-69

## **IX. Percy Farm & Clear Creek Fisheries**



- The group then traveled to the Percy Farm and Clear Creek Fisheries. The house is listed in the Indiana Historic Sites and Structures Inventory (IHSSI) as constructed circa 1880, though it seems more consistent with a circa 1860-1870 construction. The house has been owned by the Percy-Hess family since the construction of the house, according to current owner Larry Hess. T. Dougherty originally owned land, followed in later years by George Percy, and then George Hess. In 1934, the family cleared the marshy land to the east of their house to start a fishery. The historians believe the property's setting, buildings, and pond configuration are evocative of a family farm that transitioned to fish production in the twentieth century.
- No overpasses or interchanges would occur along Hess Road; Carr wondered if Hess Road would need to be improved or widened as a result of the undertaking.

#### **X. Travis Hills**

- An overpass at Stones Crossing will tie into existing grade just past the church parking lot along SR 37. No right-of-way would be acquired from the district.
- Some tree/vegetation clearing may be necessary.
- Gillette said that it is not reasonably foreseeable that additional improvements would be needed along the roadway unless the local authorities express concern at a location.
- Some ditching may be needed as well. If ditching is needed, then vegetative clearing may occur, which will alter the setting of the district.

#### **XI. Charles Laughner House (La Ciel)**

- a. Belmont Avenue would cul-de-sac under all three alternatives and would no longer connect to SR 37/I-69.
- b. The historic property boundary is close enough to the undertaking that noise modeling will be conducted, although all participants commented on the level of ambient noise.
- c. The undertaking is visible from the rear of the house. According to the property owner, the Southport Road intersection is visible at night from the upper floor, but usually not during the day.
- d. Carr noted that changes from the undertaking would not make a significant change in view. There may be an effect, but it would not be adverse.

#### **XII. Wrap-Up and Next Steps**

- Traffic counts are expected in the next two weeks. Meador will make sure the traffic counts and noise studies will look at the specific affected areas discussed in this meeting.
- W&A will prepare an eligibility report for the expanded APE area, which will be submitted to INDOT CRO, DHPA, SHPO and consulting parties for review and comment.
- W&A will prepare an effects report on all three alternatives under consideration
- A consulting party meeting will be scheduled once the effects report is distributed.

*Details discussed in this meeting are subject to change. This summary is a reflection of the status of these items at the close of the meeting.*



**Note: This meeting summary documents ongoing, internal agency deliberations. Accordingly, the information contained in this summary is considered to be pre-decisional and deliberative.**

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



May 11, 2016

James Earl, P.E.  
Project Manager  
I-69 Section 6 Project Office  
7847 Waverly Road  
Martinsville, Indiana 46151

Federal Agency: Federal Highway Administration ("FHWA")

Re: "Preliminary Alternatives Screening Report: Tier 2 Environmental Impact Statement, Section 6, Martinsville to Indianapolis" (March 29, 2016) and May 2 Section 106 site visit (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Mr. Earl:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed, selectively, the aforementioned report, accessed through a hyperlink in your March 30, 2016, e-mail message, for I-69 Section 6, which is proposed to be built in Morgan, Johnson, and Marion counties in Indiana.

As you know, my staff did not participate in the May 5, 2016, bus tour, but John Carr of my staff did participate in a site visit led by project consultants for the benefit of FHWA, Indiana Department of Transportation, and Indiana SHPO staff on May 2, 2016. The May 2 site visit focused on specific, historic above-ground properties that might be adversely impacted by one or more of the alternative alignments (C1, C2, or C3) that are still under consideration. It was helpful to have not only historical consultants but also a consulting engineer participating in the May 2 tour.

Based on observations and discussions during the May 2 tour, it appears to us that the historic above-ground property most likely to incur adverse effects from one or more of the alternative alignments is the Southside German Market Gardeners Historic District, especially a contributing house at 4401 Bluff Road in Indianapolis, immediately north of the existing I-465 overpass, and possibly a contributing house at 4425 Bluff Road, a short distance south of that overpass. The adverse effects on 4401 Bluff Road are likely to be visual effects of a retaining wall on the setting and possibly physical encroachment on the side yard. If 4425 Bluff Road were adversely affected, it likely would be due to visual effects on the setting resulting from the slope of the I-465 embankment coming closer to the side of the house. We are unable to detect a difference in the degree of effect among alternative alignments C1, C2, and C3, based on the maps in Appendix F of the preliminary alternatives screening report.

The setting of Marion County Bridge No. 4315F on Bluff Road over Pleasant Run Creek potentially could be adversely affected, depending on how tall a new bridge on I-69 over Pleasant Run Creek would stand and how close it would be built to the historic bridge. The proximity of the new I-69 bridge to the historic bridge also could limit the ability of the public to enjoy a lateral view of the historic bridge.

It does not appear that elevating Stones Crossing Road over I-69 would have a physical impact the Travis Hills Historic District. However, the elevation of, and perhaps other improvements to, Stones Crossing Road would begin just outside the district, and if large trees bordering the district would have to be removed, then the setting likely would be affected.

Determining whether that effect would be adverse would require more detailed information about the nature of the improvements to that part of Stones Crossing Road.

The potential for adverse effects on the Percy Farm & Clear Creek Fisheries at 295 Hess Road, outside Martinsville, depends on whether the I-69 Section 6 project would make improvements to Hess Road in front of the property and the nature and extent of those improvements. Effects could be physical, if part of the yard or barn lot is taken, or visual, if the relationship of the road to the house is altered significantly. The consultants were uncertain during the site visit as to whether improvements to that part of Hess Road for use as an access road would be included in any of the three alternative alignments, but maps in Appendix F of preliminary alternatives screening report do not show improvements being proposed there.

To enable us to offer more specific comments on the project's effects on any of the aforementioned properties, we would need more precise information about the proximity to the particular historic property and the size and description of proposed construction. It was difficult during the site visit to visualize the changes that would occur based only on verbal descriptions of the construction provided. Schematic plans and elevations of new construction or other proposed improvements in the immediate vicinity of each of those properties would be helpful.

The other historic above-ground properties that were visited during the May 2 site visit (La Ciel [Charles Laughner House] at 7719 Belmont Avenue in Indianapolis, John Sutton House at 988 North Bluff Road near Greenwood, Reuben Aldrich Farm at 7020 Old SR 37 in Morgan County, Top Notch Farm at 352 East Mahalasville Road near Martinsville, and Morgan County Bridge No. 224 on a closed section of Old SR 37 over Indian Creek southwest of Martinsville) may incur some visual effects but appear less likely than most of the properties discussed above to be adversely affected, based on our current understanding of the alternative alignments.

It is our impression that archaeological resources are still in the process of being identified and evaluated within the Section 6 project area. Our most recent comments on archaeological issues can be found in our letters to Kia Gillette of Lochmueller Group dated February 4, 2016, and April 14, 2016.

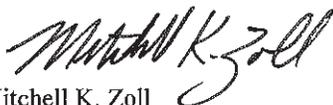
We noticed that Table 2-7 on page 2-38 and Table 2-10 on page 2-43 of the preliminary alternatives screening report identify only one historic property impact for each alternative alignment (C1, C2, C3), and that impact would be the acquisition of five acres from the Southside German Market Gardeners Historic District. We sense that perhaps only direct, physical impacts on historic above-ground properties have been identified so far.

The maps in the preliminary alternatives screening report still show the historic Stockwell Bridge (Morgan County Bridge No. 56) on Teeters Road over West Fork of Clear Creek. However, as the historical consultants have explained, within the last year or so the county demolished and replaced it with a new bridge.

Please direct questions about our comments on above-ground properties, such as buildings and structures, to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeological issues should be directed to Wade Tharp (317) 232-1650 or wtharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (Des. No. 0300382), please refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:jlc

emc: Richard Marquis, Division Administrator, Federal Highway Administration, Indiana Division  
Janice Osadczuk, Federal Highway Administration, Indiana Division

Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
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Connie Zeigler, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources, Division of Fish and Wildlife  
Wade T. Tharp, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology  
John Carr, Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology

**From: Carr, John [mailto:JCarr@dnr.IN.gov] Sent: Friday, May 27, 2016 1:53 PM**

**To: Rubin, Sarah**

**Cc: Allen, Michelle (FHWA); Tharp, Wade; Slider, Chad (DNR); Zoll, Mitchell K**

**Subject: FW: I-69 Section 6 - Section 106 Site Visit - Meeting Minutes**

Sarah,

Thanks for asking for my comments on the draft minutes. For the most part, I agree with the substance of the minutes. There are a few places that might benefit from clarification, but I don't want to suggest specific language, because I'm unsure of the intent of the draft language, how detailed minutes should be, and whether others on the site visit remember the discussion as I do.

## II. Southside German Market Gardeners Historic District

I can't tell whether the following paragraphs in the middle of page 2 are referring to the same wall that might need to be built along I-465 at Bluff Road or two different walls:

- At 4425 Bluff Road, the undertaking would require a sliver of property acquisition and acquire a portion of an existing parking lot. *A wall would be installed along the but the north drive would remain.* The group question if visibility from the wall would render the north drive unsafe.
- *A wall would also be installed west of 4425 Bluff Road.*

"West of 4425 Bluff Road" would seem to be either (1) between the house and Bluff Road (which I don't recall having been discussed and which doesn't seem likely to be needed); (2) across Bluff Road (which is covered in the next paragraph: "A wall may be installed near 4450 Bluff Road, in the southwest quadrant."); or (3) as an I-465 bridge abutment—or southward extension of the existing abutment—to the northwest of the house, under a widened I-465, on the east side of Bluff Road (which I don't recall having been discussed, but perhaps I've forgotten). So, a little elaboration on what kind of wall would be installed west of 4425 Bluff Road and clarification of its location relative to the house would help.

Minor editorial comment: In the last sentence of the paragraph beginning, "A wall may be installed near 4450 Bluff Road, in the southwest quadrant," I think "maybe" really means "may be."

## V. John Sutton House

The third point lacks a bullet. Was text accidentally omitted?

## VII. Top Notch Farm

The first sentence of the third bullet point is accurate, as far as it goes, *to wit*. "Carr stated that given the modern, existing intrusion at SR 37, there does not appear to be an adverse effect to the this [*sic*] property." However, it's a remarkably concise comment, considering its source. I can't recall whether the SHPO was asked to comment on the

I-69 Section 5 overlap's effects on Top Notch Farm (and I'd probably waste too much time trying to track down an answer), but I seem to recall that the significance of that property and possibly the I-69 constructions effects on it were considered during the Section 5 study. Given that my statement might represent, at least informally, a 180-degree turn regarding the project's effects on Top Notch Farm since the SHPO considered it several years ago, I think I should elaborate here on my reasoning, even if it isn't deemed necessary to include this elaboration in the minutes (I'll leave that to the project team's judgment).

I recall that, at the time I made the comment about the modern intrusions, I gestured toward a modern storage unit facility on the east side of South Ohio Street and the north side of Mahalasville Road and also toward a modern commercial building and a modern apartment complex beyond it on the west side of South Ohio Street. I also recall having mentioned that it appeared that the intersection immediately in front of the farmhouse (*i.e.* where South Ohio Street curves eastward 90 degrees onto Mahalasville Road) seems to have been reconfigured in recent years, when the road (or perhaps actually a private driveway) coming in from the west was angled to the northeast to meet South Ohio to the north of Mahalasville. Those are the modern intrusions to which I referred during the site visit and which I still believe collectively would render either an elevated South Ohio over I-69 or an elevated I-69 over South Ohio an insignificant change to the already-extensively-altered setting north of Top Notch Farm.

Let me know if you or anyone else has questions.

John

John L. Carr

Team Leader for Historic Structures Review

Division of Historic Preservation and Archaeology

Indiana Department of Natural Resources

402 W. Washington St., Room W274

Indianapolis, IN 46204

Ph. No.: 317-233-1949 Fax No.: 317-232-0693



# REVIEW REQUEST SUBMITTAL

State Form 55031 (7-12)

Indiana Department of Natural Resources

Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



**Please complete this form and attach it to front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review.**

Date: June 15, 2016

Is this a new submission?       Yes       No

Reference for previous submittals: DHPA # 4615      Des. No. 0300382

### **THIS REVIEW REQUEST SUBMITTED BY:**

Name: Linda Weintraut, Ph.D.

Company/Organization: Weintraut & Associates

Address: PO Box 5034, Zionsville, Indiana 46077

Telephone number: 317-733-9770      Email address: linda@weintrautinc.com

### **PROJECT NAME & LOCATION** *[Please attach a map with location(s) marked]*

Project Name/Reference: I-69 Evansville to Indianapolis Tier 2 - Section 6 Project      Project/ Des # 0300382

Project Address/Location: \_\_\_\_\_

City: \_\_\_\_\_      Township(s): \_\_\_\_\_

County/COUNTIES: Morgan, Johnson, and Marion

### **STATE OR FEDERAL AGENCY INVOLVEMENT**

Agency: FHWA      Program: \_\_\_\_\_

Type of funds, license, or permit to be obtained (if applicable): \_\_\_\_\_

Name(s) of Agency Contact: Michelle Allen

Address: 575 North Pennsylvania Street Room 254, Indianapolis, Indiana 46204

Telephone number: 317-226-7344      Email address: Michelle.Allen@dot.gov

### **APPLICANT (if different than Federal Agency)** *If available, please attach copy of authorization letter from federal agency*

Applicant: Indiana Department of Transportation

Name of Contact: Anuradha Kumar

Address: 100 North Senate Ave., IGCN 642, Indianapolis, IN 46204

Telephone number: 317-234-5168      Email address: akumar@indot.in.gov

**CONSULTANT FOR THE APPLICANT OR AGENCY (IF APPLICABLE)**

Consultant: HNTB

Name of Contact: Tim Miller

Address: 111 Monument Circle, Suite 1200, Indianapolis, IN 46204

Telephone number: 317-636-4682 Email address: tnmiller@hntb.com

**Contact for DHPA questions regarding this review request:** \_\_\_\_\_

Comments:  
Section 6 Additional Information Memorandum No. 2 for review and comment

***Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:***

- Full contact information for person/entity submitting form, including phone number and email *(if available)*
- Map of project location with project area(s) clearly marked *(provided in current or previous submission)*
- Clear photographs of project area and surroundings
- Project description
- Description of any proposed ground disturbance
- Name of Federal agency/agencies and program providing funds, license, or permit
- Letter of authorization from Federal agency/agencies *(if applicable)*

**Return this Form and Attachments to:**

**Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, Indiana 46204**

**<http://www.in.gov/dnr/historic>**



# INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue  
Room N642  
Indianapolis, Indiana 46204

PHONE: (317) 233-2061  
FAX: (317) 232-4929

**Michael R. Pence, Governor**  
**Brandye L. Hendrickson,**  
**Commissioner**

June 15, 2016

Dear Consulting Party:

The Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation (INDOT), is preparing an Environmental Impact Statement (EIS) for Section 6 of the I-69 Evansville to Indianapolis Tier 2 Studies (Des. No. 0300382; DHPA No.: 4615). Section 106 of the National Historic Preservation Act (1966) requires Federal agencies to take into account the effects of their undertakings on historic properties. Historic properties are those properties that are listed in, or eligible for listing in, the National Register of Historic Places.

On October 16, 2015, FHWA re-initiated consultation for the I-69 Section 6 Study by extending invitations to join in consultation to those who had previously been consulting parties and to those individuals, groups, and tribes with a demonstrated interest in the project. In November 2015, consulting parties were provided a copy of the Historic Property Report Additional Information (AI) for the State Road 37 Alternatives. On December 7, 2015, a consulting party meeting was held to review the Section 106 process to date, provide an update on archaeology, and discuss the eligibility recommendations in the HPR Additional Information Report.

Since that time, the project consultants have prepared an Additional Information (AI) Memorandum—No. 2 to describe changes that have occurred since the publication of the AI Historic Property Report (2015). As a willing consulting party, you are invited to review and comment on this memorandum.

You may access the eligibility recommendations for this aboveground study: AI Memorandum— No. 2 for the State Road 37 Alternatives at the IN-SCOPE website located at the following link.

<http://netservices.indot.in.gov/Section106Documents/Default.aspx>

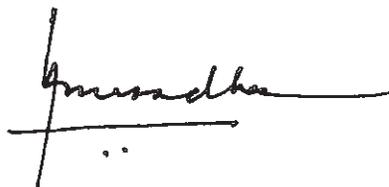
The Des No. is the most efficient search term, once in IN-SCOPE. Any invited consulting party who makes such a request to Weintraut & Associates within seven (7) days of receipt of this notification will receive a hard copy of this material.

*If you wish to request a hard copy or to provide written comments on the AI Memorandum No. 2, please send them by post to: Weintraut & Associates, P.O. Box 5034, Zionsville, Indiana, 46077 or by email to: [linda@weintrautinc.com](mailto:linda@weintrautinc.com).*

For questions regarding Section 106, Tribal contacts may contact Michelle Allen at FHWA at [michelle.allen@dot.gov](mailto:michelle.allen@dot.gov) or 317-226-7344 or Shaun Miller at [smiller.indot.in.gov](mailto:smiller.indot.in.gov) or 317-233-2061.

To facilitate the development of this project, please respond with your comments on the AI Memorandum No. 2 **within thirty (30) days** from the date of receipt of this letter. Should you find that an extension to the response time necessary, a reasonable amount may be granted upon request.

Best regards,

A handwritten signature in black ink, appearing to read "Anuradha", written over a horizontal line. The signature is fluid and cursive.

Anuradha Kumar  
Manager, INDOT Cultural Resources

Cc: Michelle Allen, FHWA  
Christine Meador, HNTB  
Kia Gillette, Lochmueller Group.  
Dr. Linda Weintraut, Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Cameron F. Clark, Director

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



July 14, 2016

Anuradha Kumar  
Manager, Cultural Resources Office  
Environmental Services  
Indiana Department of Transportation  
100 North Senate Avenue, Room N642  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Additional Information (AI) Memorandum No. 2 (Natali, 6/2016), describing changes since publication of the Historic Property Report Additional Information (AI) for the State Road 37 Alternatives (2015), for I-69 Evansville to Indianapolis: Tier 2 Studies Section 6 (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Ms. Kumar:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed your cover letter of June 15, 2016, with the aforementioned document enclosed, for I-69 Section 6, which is proposed to be built in Morgan, Johnson, and Marion counties in Indiana.

We are satisfied with the area of potential effects ("APE"), as it has been expanded in 2016.

For the purposes of the Section 106 review of this project, we agree that the Percy Farm and Clear Creek Fisheries (Indiana Historic Sites and Structures Inventory No. 109-386-60015) at 295 Hess Road (possibly a Martinsville postal address) is eligible for inclusion in the National Register of Historic Places under Criterion A, and that the farmhouse, in addition, is eligible under Criterion C. We also agree that this property is the only above-ground property within the areas into which the APE has most recently been expanded that appears to be eligible for the National Register.

Please direct questions about our comments on above-ground properties, such as buildings and structures, to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeological issues should be directed to Wade Tharp (317) 232-1650 or wtharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (Des. No. 0300382), please refer to DHPA No. 4615.

Very truly yours,

Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:jlc

cc: Linda Weintraut, Ph.D., Weintraut & Associates, Inc.

emc: Janice Osadczuk, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation  
James Earl, P.E., Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Anuradha Kumar, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
I-69 Section 6 Project Office  
William Wiedelman, P.E., HNTB Corporation  
Christine Meador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Timothy Miller, HNTB Corporation  
Michael Grovak, Lochmueller Group  
Jason DuPont, P.E., Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Bernardin, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources, Division of Fish and Wildlife  
Wade T. Tharp, Department of Natural Resources, Division of Historic Preservation and Archaeology  
John Carr, Department of Natural Resources, Division of Historic Preservation and Archaeology



# REVIEW REQUEST SUBMITTAL

State Form 55031 (7-12)  
Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology, Indiana State Historic Preservation Office (SHPO)



**Please complete this form and attach it to front of all submittals, along with any reports or supplemental materials you are providing to the Indiana DHPA for review.**

Date: August 2, 2016

Is this a new submission?       Yes       No

Reference for previous submittals: DHPA # 4615      Des. No. 0300382

### **THIS REVIEW REQUEST SUBMITTED BY:**

Name: Linda Weintraut

Company/Organization: Weintraut & Associates, Inc.

Address: PO Box 5034, Zionsville, Indiana

Telephone number: 317-733-9770      Email address: linda@weintrautinc.com

### **PROJECT NAME & LOCATION** *[Please attach a map with location(s) marked]*

Project Name/Reference: I-69 Tier 2 Studies: Section 6      Project/ Des # 0300382

Project Address/Location: SR 37 from south of SR 39 to I-465

City: \_\_\_\_\_ Township(s): \_\_\_\_\_

County/COUNTIES: Morgan, Johnson, Marion

### **STATE OR FEDERAL AGENCY INVOLVEMENT**

Agency: Federal Highway Administration      Program: \_\_\_\_\_

Type of funds, license, or permit to be obtained (if applicable): \_\_\_\_\_

Name(s) of Agency Contact: Michelle Allen

Address: 575 North Pennsylvania Street, Room 254, Indianapolis, IN 46204

Telephone number: 317-226-7344      Email address: michelle.allen@dot.gov

### **APPLICANT (if different than Federal Agency)** *If available, please attach copy of authorization letter from federal agency*

Applicant: Indiana Department of Transportation

Name of Contact: Patrick Carpenter

Address: 100 North Senate Avenue, IGCN 642, Indianapolis, IN 46204

Telephone number: 317-233-2061      Email address: pacarpenter@indot.in.gov

**CONSULTANT FOR THE APPLICANT OR AGENCY (IF APPLICABLE)**

Consultant: HNTB

Name of Contact: Christine Meador

Address: 111 Monument Circle, Suite 1200, Indianapolis, Indiana 46204

Telephone number: 317-636-4682 Email address: CMeador@hntb.com

**Contact for DHPA questions regarding this review request:** Christine Meador, Linda Weintraut

Comments:  
Enclosed is the transmittal letter and Effects Report for your review.

**Please note that incomplete submissions may result in delays. To ensure an expeditious review, please be sure that the following has been provided:**

- Full contact information for person/entity submitting form, including phone number and email (if available)
- Map of project location with project area(s) clearly marked (provided in current or previous submission)
- Clear photographs of project area and surroundings
- Project description
- Description of any proposed ground disturbance
- Name of Federal agency/agencies and program providing funds, license, or permit
- Letter of authorization from Federal agency/agencies (if applicable)

**Return this Form and Attachments to:**  
  
**Indiana Department of Natural Resources  
Division of Historic Preservation and Archaeology  
402 W. Washington Street, Room W274  
Indianapolis, Indiana 46204**  
  
<http://www.in.gov/dnr/historic>

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## Questions about I-69 Sec 6 and Marion Co Br No 4513F

1 message

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**Carr, John** v>  
To:

Fri, Aug 26, 2016 at 1:17 PM

Linda,

I apologize for my delay in getting back to you. I got side-tracked by reviews of other projects coming due this week (Imagine that!), but Mary Kennedy kindly reminded me yesterday.

After the August 17 consulting parties meeting, I stopped at Bridge No. 4513F to refresh my memory of the setting and the bridge's current proximity to the existing SR 37 bridge over Pleasant Run. That helped, but I'm not sure I can accurately visualize the horizontal distances between the nearest point on No. 4513F and the proposed ROWs and nearest points on the bridges proposed for alternatives C2 and C3.

I don't think I have any reason to be concerned about an adverse effect from Alternative 1, even though the deck and rail on the northbound I-69 bridge would be 10-15 feet higher (as I recall) than the deck on the SR 37 northbound bridge, because the northbound I-69 bridge would be about where the southbound SR 37 bridge is now, and, as far as I can tell, the I-69 right-of-way (and whatever grading, filling, etc., goes on within it) would not get much, if any, closer to No. 4513F than it is now.

However, the northbound bridges for both C2 and C3 and the I-69 ROW would get somewhat closer to No. 4513F, as well as being 10-15 feet higher, and I'm trying to visualize whether the C2 and C3 bridges and embankments would appear to "loom over" No. 4513F. As I said at the August 17 meeting, our National Register experts in the SHPO's office have told me a number of times that while setting may not be as important to a property eligible only under Criterion C as it would be to a property eligible under Criterion A, that doesn't mean that setting is irrelevant to a Criterion C-only property. I believe the same would be true for visual effects.

It appeared to me when I was last at No. 4513F that the nearest point on that bridge to the nearest part of any part of the SR 37 northbound bridge or roadway would be the end of the rail at the southwest corner of No. 4513F. I estimated roughly that the nearest point on the SR 37 bridge or roadway would be a point about 10-15 feet north of the end of the rail on the southeast corner of the SR 37 bridge.

So, without going out into the field and taking measurements, and without generating any new, formal drawings (other than perhaps schematic sketches, if you think that would help), can you give me an approximate distance between the following points:

- 1) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 ROW.

- 2) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 northbound bridge (or roadway, if applicable, but I'm thinking it's on the SR 37 bridge).
  
- 3) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge ROW.
  
- 4) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge or roadway.
  
- 5) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C3 northbound bridge ROW.
  
- 6) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge or roadway.

If it's too hard to come up with even approximations of these figures within the next few days, then I'll just comment as best I can by September based on my recollection and a few photos I took during my August 17 stop at No. 4513F.

Thanks!

John

John L. Carr

Team Leader for Historic Structures Review

Division of Historic Preservation and Archaeology

Indiana Department of Natural Resources

402 W. Washington St., Room W274

Indianapolis, IN 46204

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## Fwd: Questions about I-69 Sec 6 and Marion Co Br No 4513F

1 message

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>

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From: Linda Weintraut [mailto:linda@weintrautinc.com]  
Sent: Monday, August 29, 2016 8:42 AM  
To: Carr, John  
Cc:

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

---

John,

Please attached answers in red. To be as accurate as possible, HNTB used CAD to determine answers to questions that you posed on Friday afternoon. I hope this helps. Linda

- 1) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 ROW. – 36 feet from approximate existing ROW
  
- 2) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 northbound bridge (or roadway, if applicable, but I'm thinking it's on the SR 37 bridge). - 105 feet from the existing SR 37 bridge to the existing bridge
  
- 3) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge ROW. – 36 feet; same as existing
  
- 4) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge or roadway. - 71 feet
  
- 5) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C3 northbound bridge ROW. -36 feet, same as existing
  
- 6) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C3 northbound bridge or roadway. - 71 feet

- 2) The end of the rail on the southwest corner of No. 4513F and the nearest point on the SR 37 northbound bridge (or roadway, if applicable, but I'm thinking it's on the SR 37 bridge).
  
- 3) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge ROW.
  
- 4) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge or roadway.
  
- 5) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C3 northbound bridge ROW.
  
- 6) The end of the rail on the southwest corner of No. 4513F and the nearest point on the I-69 Alternative C2 northbound bridge or roadway.

If it's too hard to come up with even approximations of these figures within the next few days, then I'll just comment as best I can by September based on my recollection and a few photos I took during my August 17 stop at No. 4513F.

Thanks!

John

John L. Carr

Team Leader for Historic Structures Review

Division of Historic Preservation and Archaeology

Indiana Department of Natural Resources

402 W. Washington St., Room W274

Indianapolis, IN 46204

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
Cameron F. Clark, Director

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



September 1, 2016

Jermaine R. Hannon  
Acting Division Administrator  
Federal Highway Administration, Indiana Division  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Identification of effects report (Natali and Weintraut, 8/1/2016); August 17, 2016, consulting parties meeting; and Weintraut & Associates' August 29, 2016, e-mail response to our questions about alternatives C2 and C3 relative to Marion County Bridge No. 4513F; all with regard to I-69 Evansville to Indianapolis: Tier 2 Studies Section 6 (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Mr. Hannon:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed your cover letter of August 2, 2016, with the aforementioned report enclosed, which we received in paper form on August 4, and Weintraut & Associates' aforementioned August 29 e-mail, regarding I-69 Section 6, which is proposed to be built in Morgan, Johnson, and Marion counties in Indiana.

The adverse effect identified for the historic Reuben Aldrich Farm is based on changes to the historic farmstead's setting, as a result of projected doubling (Alternative C3), tripling (Alternative C2), or quadrupling (Alternative C) the volume of traffic on Old SR 37 between 2010 and 2045, including at least a six-fold increase in truck traffic for any of those alternatives. Any of those levels of increase likely would be noticeable to the owners of the farmstead both visually and audibly (even if the potential for increased noise does not warrant mitigation under FHWA or Indiana Department of Transportation standards). How burdensome those increases would be is difficult to gauge. Because such increases would be sizeable, we are willing to agree that they may have an adverse effect, although we would recommend attempting to obtain the owners' input on what they think the impact on the property would be.

Devising meaningful mitigation for that particular adverse effect seems to be difficult, as the discussion at the August meeting indicated. John Carr of my staff thought he heard it suggested that the possibility of vegetative screening might be investigated. That could soften the effects of the increased traffic, but on the downside, screening would make it harder to enjoy the historic property from the public right-of-way. Input from the owners should be obtained, if possible, as to whether they think vegetative screening would be beneficial. Even if the owners think it would be beneficial, there would remain the question of whether to plant it on the Old SR 37 right-of-way (which presumably is county-owned) or on the farmstead side of the right-of-way line; it appears that the consent and cooperation of either the county or the private property owner would be necessary. If this project does have an adverse effect as a result of the increased traffic, it might be that it is of a degree and a kind that cannot specifically and meaningfully be mitigated.

We appreciate having received from Weintraut & Associates the approximate distances, at the closest points, between historic Marion County Bridge No. 4513F and the existing SR 37 bridge over Pleasant Run and the SR 37 right-of-way and between the historic bridge and the proposed I-69 bridges and rights-of-way for alternatives C2 and C3. Because Alternative C1 would move the new bridge farther away from the historic bridge than the existing SR 37 is, we do not think C1 could have an adverse effect. As we understand it, the right-of-way for both C2 and C3 would be the same distance

away from the historic bridge as the SR 37 right-of-way is. Either the C1 or the C2 bridge, however, would be about 71 feet from the historic bridge, whereas the existing SR 37 bridge is about 105 feet away. It is our understanding that the new, northbound bridge (*i.e.*, the bridge that would be closer to the historic bridge) for C1, C2, or C3 would stand about 10 to 15 feet higher than the historic bridge. Although the new C2 or C3 bridge would be about 34 feet closer, we think the 71-foot space between either of them and the historic Marion County Bridge No. 4513F would be sufficient to avoid adversely affecting the setting or viewshed of the historic bridge.

The question was raised at the August 17 meeting about whether it would be preferable to use a mechanically stabilized earth ("MSE") retaining wall along I-465 in the northeast and northwest quadrants of that highway's over pass of Bluff Road or to use a sloped, earthen embankment, as is proposed in the variation of Alternative C2. An MSE wall has the advantage of occupying less space and not extending as far into the Southside German Market Gardeners Historic District, but, as another consulting party noted at the meeting, a grassy slope would be somewhat more in keeping with the emphasis on green plants that give the district part of its character.

We do not have a preference between the MSE wall and the sloped, earthen embankment. The construction of I-465 through what only later was recognized as a historic district had a greater impact than any of the alternatives for improving that part of I-465 would. Elevating the I-465 bridges over Bluff Road will tend to aggravate the intrusive nature of the highway. If the house at 4401 Bluff Road is removed, the district will lose a contributing building, but, as a practical matter, it is difficult to foresee that house being considered suitable for human habitation and continuing to exist in the long run, due to its proximity to the highway and the existing traffic noise.

If an MSE wall is used, some kind of textured or scored surface might be less stark than a plain, concrete wall, although, as someone mentioned at the meeting, it would be best if it were by nature or by application of a coating relatively resistant to graffiti.

The only other, possibly beneficial mitigation or minimization measure that would directly address and alleviate some aspect of the impact of changes to I-465 on the Southside German Market Gardeners Historic District would be to widen the opening under I-465, in an effort to reduce the visual effect of the highway's being a barrier between the north and south parts of the district. However, that would mean lengthening the bridges, and it is our understanding that building structures such as bridges is more expensive than building a roadway atop earthen fill.

We agree with the identification of effects report that any of the alternatives of I-69 Section 6 would have an overall adverse effect on historic properties.

Please direct questions about our comments on above-ground properties, such as buildings and structures, to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeological issues should be directed to Wade Tharp (317) 232-1650 or wtharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,

  
Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:jlc

cc: Linda Weintraut, Ph.D., Weintraut & Associates, Inc.

emc: Janice Osadczuk, Federal Highway Administration, Indiana Division  
Michelle Allen, Federal Highway Administration, Indiana Division  
Sarah Rubin, Indiana Department of Transportation

James Earl, P.E., Indiana Department of Transportation  
Laura Hilden, Indiana Department of Transportation  
Anuradha Kumar, Indiana Department of Transportation  
Patrick Carpenter, Indiana Department of Transportation  
Mary Kennedy, Indiana Department of Transportation  
Shaun Miller, Indiana Department of Transportation  
Shirley Clark, Indiana Department of Transportation  
I-69 Section 6 Project Office  
Christine Meador, HNTB Corporation  
Rich Connolly, HNTB Corporation  
Timothy Miller, HNTB Corporation  
Michael Grovak, Lochmueller Group  
Jason DuPont, P.E., Lochmueller Group  
Kia Gillette, Lochmueller Group  
Connie Zeigler, Bernardin, Lochmueller Group  
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape, Inc.  
Matt Buffington, Indiana Department of Natural Resources, Division of Fish and Wildlife  
Wade T. Tharp, Department of Natural Resources, Division of Historic Preservation and Archaeology  
John Carr, Department of Natural Resources, Division of Historic Preservation and Archaeology



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

**Indiana Division** 575 North Pennsylvania Street, Room 254  
Indianapolis, IN 46204  
(317) 226-7475

October 28, 2016

In Reply Refer To:  
HDA-IN

Dear Consulting Party:

The Federal Highway Administration (FHWA), in cooperation with the Indiana Department of Transportation (INDOT), is preparing a Tier 2 Environmental Impact Statement (EIS) for Section 6 of the I-69 Evansville to Indianapolis project (Des. No. 0300382; DHPA No.: 4615). Section 106 of the National Historic Preservation Act (1966) requires Federal agencies to take into account the effects of their undertakings on historic properties. Historic properties are those properties that are listed in, or eligible for listing in, the National Register of Historic Places.

On October 16, 2015, FHWA re-initiated consultation for the I-69 Section 6 evaluation of cultural resources under Section 106 by extending invitations to join in consultation to those who had previously been consulting parties and those individuals, groups, and tribes with a demonstrated interest in the project. Since that time, the following above-ground reports have been disseminated to those who accepted consulting party status: *Historic Property Report Additional Information No. 1*; *Historic Property Report Additional Information No. 2*; and *Identification of Effects Report*.

You may access these reports at INDOT's Section 106 document posting website, IN-SCOPE, at <http://erms.indot.in.gov/Section106Documents/>. The Des. No. is the most efficient search term, once in IN-SCOPE.

The *Historic Property Report Additional Information No. 1* identified the area both north and south of I-465 along Bluff Road as the Southside German Market Gardeners Historic District. This area had not previously been identified as a historic district and is referred to as the Southside German Market Gardeners Historic District for the purposes of this I-69 Section 6 study. The Southside German Market Gardeners Historic District has been recommended eligible for listing in the National Register of Historic Places. The *Identification of Effects Report* (August 1, 2016) recommended an Adverse Effect finding for the Southside German Market Gardeners Historic District for the following reasons: the home at 4401 Bluff Road may be demolished, land will be acquired from the district, and I-465 will be widened resulting in the construction of mechanically stabilized earth (MSE) retaining walls along the south side I-465 and MSE retaining walls and/or an earthen slope along the north side of I-465 within the district.

Since the publication of the *Identification of Effects Report*, INDOT and FHWA invited property owners within the Southside German Market Gardeners Historic District to a meeting to discuss the project, including the option of a MSE retaining wall or a possible slope within the District. That meeting occurred on the evening of October 4, 2016, at the German American Klub at 8602 South Meridian Street. The purpose of the meeting was to update residents on the status of I-69 Section 6, discuss potential impacts and potential mitigation measures to historic properties, answer questions regarding the project and historic properties, and solicit feedback. INDOT discussed potential impacts to the district, including the effects of widening I-465, and the potential use of MSE retaining walls or earthen slopes along I-465. A meeting summary and graphics presented at the meeting are attached.

I-465 will be widened to accommodate additional capacity between approximately U.S. 31 and Mann Road and the I-465 bridge over Bluff Road will be raised by approximately two feet in order to meet current bridge clearance standards. Both the north and south sides of I-465 are currently fronted by an earthen slope.

Along the south side of I-465 within the historic district, current design options are an MSE retaining wall or an earthen slope. Use of an MSE retaining wall would avoid direct impacts to two contributing residential structures within the District and would minimize acquisition of new right of way. The existing earthen embankment is approximately 18 to 20 feet in height and the proposed MSE retaining wall would be approximately 20 to 22 feet high at Bluff Road and extend to the Harding Street ramps on the west and the US 31 ramps on the east. The MSE retaining wall is the recommended alternative at this location.

Along the north side of I-465 within the historic district, current design options also include an MSE retaining wall, earthen slope, or a combination of the two. The house at 4401 Bluff Road is contributing to the historic district and is located on the existing right of way line for I-465. The earthen slope would impact the house located at 4401 Bluff Road resulting in its removal and would impact two electric transmission towers located east of Bluff Road, potentially requiring their relocation.

The MSE retaining wall would be 35 feet south of the corner of the house and 25 to 45 feet south of the electric transmission towers. The house and electric transmission towers could remain in place. The MSE retaining wall would be approximately 22 feet high at Bluff Road and extend either the entire width of the District or from Bluff Road east past the eastern edge of the District with an earthen slope west of Bluff Road. The MSE retaining wall would not directly impact the house or electric transmission towers, but the use of the wall might not be sufficient to avoid impacts. The MSE retaining wall could result in physical impacts to 4401 Bluff Road during construction and future livability concerns based on the proximity of the house to I-465.

A combination of MSE retaining wall and earthen slope is recommended in this location. The earthen slope would be used on the west side of Bluff Road within the historic district. The earthen slope with MSE retaining wall around the electric transmission towers would be used on

the east side of Bluff Road within the historic district. The MSE walls around the towers would be up to 14 feet in height and gradually slope to existing ground level.

Two comments were received subsequent to the October 4, 2016 meeting. One expressed a preference for the slope. The second expressed a concern for the potential increase in flooding from highway run off and for the potential increase in noise levels. The submitter asked if a sound wall is a possibility. These comments are attached for reference.

In addition to the October 4, 2016 public meeting, INDOT met with the property owners of 4401 Bluff Road on October 17, 2016 to discuss the wall versus slope option. The owners agreed that the wall would not be “reasonable and prudent” and requested that they be relocated. The owners stated that the house was built of unreinforced masonry (not frame) and cannot be moved. They also indicated the house could potentially be damaged during construction due to the vibration from construction machinery. Additionally, INDOT and HNTB conducted a on-site assessment of the house at 4401 Bluff Road on October 25, 2016. It was confirmed that the house was constructed of unreinforced masonry.

Since the publication of the *Identification of Effects Report*, additional information regarding noise impacts on historic properties has become available. The *Identification of Effects Report* was based on the best information available at the time of preparation. Since the publication of that report, preliminary noise information has been refined for properties within 800 feet of the I-69 Section 6 mainline or of a local road that will experience increased traffic as a result of the undertaking.

The INDOT Traffic Noise Analysis Procedure states that highway noise impacts occur if either of two conditions is met: 1) the predicted Leq(h) levels “approach” or “exceed” the appropriate noise abatement criteria for the land use identified, or 2) the predicted highway Leq(h) noise levels substantially exceed the existing noise level. “Approach or exceed” is defined as levels that are within 1 decibels dBA Leq(h) of the appropriate Noise Abatement Criteria (NAC) or higher. The NAC for Category B land use (residential properties) is 67 dBA. Accordingly, 66 dBA is the level at which highway noise impacts occur. “Substantially exceed” means predicted traffic noise levels exceed existing noise levels by 15 dBA or more. Please note that if the existing ambient noise level currently approaches or exceeds the criteria, then predicted increases are not considered effects unless there is an increase of 15 dBA. Existing, and design year 2045, sound levels were determined by noise level measurement and/or FHWA TNM 2.5 modeling, as applicable.

Table 1 presents the existing modeled noise levels (“Before”) at the historic properties and the design year modeled noise levels (“After”) with I-69 Section 6 in place. The historic properties listed in the table are already located along a highly traveled state road. INDOT and FHWA have determined that the INDOT Traffic Noise Analysis Procedure would, therefore, apply.

The predicted noise levels are below the stated criteria of 66 dBA and do not exceed an increase of 15 dBA. Based on the analysis, the predicted noise levels will not cause any additional adverse effect. Additionally, since sound levels are added logarithmically and not linearly, it

would take a subsequent “doubling” of present traffic volumes to increase the predicted noise levels by 3 decibels. A 3 dB(A) increase in the Leq noise level is barely perceptible to the human ear in the natural environment.

<b>Table 1. Modeled Noise Levels for Historic Properties</b>			
<b>Historic Property</b>	<b>Existing Noise, Leq, dBA (Before)</b>	<b>Design Year Noise, Leq, dBA (After)</b>	<b>Noise Difference, Leq, dBA</b>
John Sutton House	57.4	64.0	6.6
Southside German Market Historic District	69.7	67.0/70.1*	-2.7/0.4
Glenwood Homes Association Historic District #1	54.3	63.0	8.7
Glenwood Homes Association Historic District #2	52.1	56.6	4.5
Travis Hills Historic District #1	53.9	60.6	6.7
Travis Hills Historic District #2	57.5	56.9	-0.6
Le Ciel (Laughner House)	56.9	65.9	9.0
Cleary-Barnett House	49.9	55.2	5.3
Glenn’s Valley Nature Park Retreat House	47.5	54.5	7.0
Top Notch Farm	49.6	57.9	8.3
Grassyfork Fisheries Farm No. 1	48.2	55.7	7.5
Pearcy Farm & Clear Creek Fisheries	41.6	44.9	3.3
Reuben Aldrich Farm	50.1	52.6	2.5

\* Noise level with retaining wall and safety barrier/Noise level without retaining wall and safety barrier

We are sending this additional information regarding noise modeling and meetings with the property owners of the Southside German Market Gardeners Historic District as part of our ongoing consultation for this project. We ask that you please comment if you have a preferred option in the northeast corner of Bluff Road and I-465 (i.e. an MSE retaining wall or earthen slope). We respectfully request any comments you have on this information no later than 30 days of the date of this letter.

Best regards,



Mayela Sosa  
Division Administrator

Attachment: Meeting Summary, Graphics, and Comments

cc: Michelle Allen, FHWA  
Sarah Rubin, INDOT  
James Earl, INDOT  
Christine Meador, HNTB  
Kia Gillette, Lochmueller Group.  
Dr. Linda Weintraut, Weintraut & Associates, Inc.  
Beth McCord, Gray & Pape

# DNR Indiana Department of Natural Resources

Michael R. Pence, Governor  
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November 28, 2016

Mayela Sosa  
Division Administrator  
Federal Highway Administration, Indiana Division  
575 North Pennsylvania Street, Room 254  
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Information about alternatives for the northeast quadrant of I-465 and Bluff Road, as they would affect the house at 4401 Bluff Road in Marion County, in connection with the I-69 Evansville to Indianapolis: Tier 2 Studies Section 6 (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Ms. Sosa:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 306108), 36 C.F.R. Part 800, and the National Environmental Policy Act of 1969 (42 U.S.C § 4321, *et seq.*), the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed your letter of October 28, 2016, with enclosures, which we received on October 31, regarding I-69 Section 6, which is proposed to be built in Morgan, Johnson, and Marion counties in Indiana.

The narrow issue on which the October 28 letter asked us to comment is "if you have a preferred option in the northeast corner of Bluff Road and I-465 (i.e. an MSE retaining wall or earthen slope." As you know, we had attempted to answer that question previously, both formally and informally, but apparently our response was not precise enough to provide the feedback that FHWA needs. Since then, you have provided the information included in and enclosed with your October 28 letter for our general information and to aid us in developing a more precise answer.

We accept the recommendation that an earthen slope be constructed east of Bluff Road and north of I-465 within the Southside German Market Gardeners Historic District, with MSE (*i.e.*, mechanically stabilized earth) retaining walls being constructed around the electric transmission towers to the east of the house at 4401 Bluff Road. We realize that this alternative probably would result in the total loss of that house, which contributes to the significance of the historic district, because we infer from the information you provided that moving the house is not feasible in light of its unreinforced masonry construction. Allowing the house to remain in place by constructing an MSE wall instead of an earthen slope does not appear to be prudent, because the information provided states that the current owners of the house "agreed that the wall would not be 'reasonable and prudent' and requested they be relocated." The current owners' comments could lead one to conclude that if the house were to be left standing, it might be abandoned. We recall that one consulting party had recommended a grassy slope at the August 17, 2016, consulting parties meeting, and your information indicates that another property owner within the historic district recently expressed a similar preference. For these reasons, we are not asking that this project avoid taking the house at 4401 Bluff Road by constructing an MSE wall as close as 35 feet away from the house.

Please direct questions about our comments on above-ground properties, such as buildings and structures, to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeological issues should be directed to Wade Tharp (317) 232-1650 or wtharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (Des. No. 0300382), please continue to refer to DHPA No. 4615.

Very truly yours,



Mitchell K. Zoll  
Deputy State Historic Preservation Officer

MKZ:JLC:jlc

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Michelle Allen, Federal Highway Administration, Indiana Division  
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