

**Public Notice**  
**Section 106 Finding of Effect**

The Indianapolis Public Transportation Corporation (IndyGo) is planning to undertake development of a fleet terminal and maintenance facility (Project) funded in part by the Federal Transit Administration. The project is located at 9503 and 9625 East 33rd Street, Indianapolis, Indiana.

The Project would involve renovations and construction of a new fleet terminal and maintenance facility at their East Campus location to provide bus storage, maintenance bays, and supporting spaces for offices, driver support areas, parts storage, and similar supporting functions.

The Project does not impact properties listed in or eligible for the National Register of Historic Places. IndyGo, on behalf of the FTA, has issued a “No Historic Properties Affected” finding for the project due to the fact that no historic properties are present within the Area of Potential Effects (APE).

In accordance with the National Historic Preservation Act, the views of the public are being sought regarding the effect of the proposed project on the historic elements as per 36 CFR 800.2(d), 800.3(e) and 800.6(a)(4). Pursuant to 36 CFR 800.4(d)(1), the documentation specified in 36 CFR 800.11(d) is available for inspection at IndyGo’s website at <https://www.indygo.net/projects/>. This documentation serves as the basis for the “No Historic Properties Affected” finding.

Please reply with any comments to LaTeeka Washington at [lwashington@indygo.net](mailto:lwashington@indygo.net) no later than May 9, 2023.

In accordance with the “Americans with Disabilities Act”, if you have a disability for which IndyGo needs to provide accessibility to the document such as interpreters or readers, please contact LaTeeka Washington at [lwashington@indygo.net](mailto:lwashington@indygo.net) or (317) 614-9304.



# INDIANA ARCHAEOLOGICAL SHORT REPORT

State Form 54566 (R3 / 3-22)

## INDIANA DEPARTMENT OF NATURAL RESOURCES DIVISION OF HISTORIC PRESERVATION AND ARCHAEOLOGY

402 West Washington Street, Room W274

Indianapolis, Indiana 46204-2739

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

|   |                      |                                      |
|---|----------------------|--------------------------------------|
| Name(s) of author(s)<br>Jocelyn Connolly  |                      | Date (month, day, year)<br>1/10/2023 |
| Title of project<br>IndyGo East Campus Expansion in Indianapolis, Marion County, Indiana  |                      |                                      |
| This document is being used to report on the results of:<br><input checked="" type="checkbox"/> Records check only <input type="checkbox"/> Records check and Phase 1a archaeological reconnaissance<br><input type="checkbox"/> An addendum to a previous archaeological report. For an addendum, provide the following information. |                      |                                      |
| Name(s) of author(s) of previous report   |                      |                                      |
| Title of previous report  |                      |                                      |
| Date of previous report (month, day, year)  | DHPA number<br>30100 |                                      |

### PROJECT OVERVIEW

IndyGo's existing headquarters, located just west of downtown Indianapolis at 1501 W. Washington Street, has been determined to be inadequate to accommodate growth resulting from implementation of the Marion County Transit Plan. The facility currently houses administrative staff, a bus garage and maintenance facility under one roof. An engineering review of the existing facility plans, combined with IndyGo's experiences trying to accommodate the already expanding fleet within the current footprint provide the basis for this conclusion.

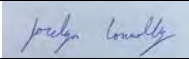
IndyGo therefore purchased the property at 9503 E. 33<sup>rd</sup> Street in 2020 with local funds (see Figures 1, 2, and 5 for project area and property details). The site will become IndyGo's new headquarters and "East Campus". The existing facility at 1501 W. Washington will continue to operate as a garage and maintenance facility with some administrative staff remaining for support.

Two existing buildings have been renovated at the 9503 E 33<sup>rd</sup> Street property to house administrative staff. The majority of that work occurred in 2022 and will be fully completed in early 2023. Administrative staff will move to the site this summer. IndyGo next desires to construct a new fleet terminal and maintenance facility on the site to accommodate its growing fleet and their operational needs. The new facility will provide bus storage, maintenance bays, and supporting spaces for offices, driver support areas, parts storage, and similar supporting functions.

IndyGo's original plan was to design the fleet terminal and maintenance facility within the boundaries of the 9503 E. 33<sup>rd</sup> Street property. However, it has become clear that there is not adequate space to fully meet IndyGo's needs. IndyGo is now considering purchase of the adjacent property at 9625 E. 33<sup>rd</sup> Street to accommodate the extents of the new fleet terminal and operations facility. Additionally, this new property would contain an operator training track and employee parking. It is intended for this to be surface parking, although there may be a long-term need for structured parking as the site is built out. A Master Plan for the site is underway now and expected to be completed in late spring/early summer 2023, at which point design activities will begin for the new fleet terminal. The new fleet terminal and maintenance facility is expected to span the two parcels.

The property at 9625 E. 33<sup>rd</sup> Street is not currently owned by IndyGo. The current property owners have not been willing to grant access to the site for surveys or other field work. Both the 9503 and 9625 E 33<sup>rd</sup> Street parcels were formerly owned by truckload shipping company Celadon, which used the site for its headquarters, storage of vehicles, vehicle maintenance, fueling and training. The NEPA evaluation that is currently underway – as well as the assessment detailed in this document – covers the proposed work associated with both parcels.

|  |  |                      |                  |
|--|--|----------------------|------------------|
| INDOT designation number(s)  | Project number<br>22-2805.001              | DHPA number<br>30100 | DHPA plan number |
| Prepared for: (Company / Institution / Agency)<br>IndyGo   |  |                      |                  |
| Name of contact<br>Jennifer Pyrz P.E.  |  |                      |                  |
| Address (number and street, city, state, and ZIP code)<br>1501 West Washington Street, Indianapolis, Indiana 46222 |  |                      |                  |
| Telephone number<br>(317)559-4178  | E-mail address<br>Jennifer.Pyrz@IndyGo.net |                      |                  |
| Name of principal investigator<br>Jocelyn Connolly   |  |                      |                  |

|   |  |
|---|--|
| Name of company / institution<br>Gray & Pape, Inc.  |  |
| Address (number and street, city, state, and ZIP code)<br>1318 Main St, Fl 1, Cincinnati, OH 45202                                  |  |
| Telephone number<br>(614)619-0281   | E-mail address<br>jconnolly@graypape.com |
| Signature of principal investigator (Required)<br> | Date (month, day, year)                  |

| PROJECT LOCATION   |  |     |     |         |                          |       |
|--|--|-----|-----|---------|--------------------------|-------|
| County<br>Marion   | USGS 7.5' series topographic quadrangle<br>Indianapolis, East, and Cumberland, Indiana |     |     |         | Civil township<br>Warren |       |
| Legal Location   |  |     |     |         |                          |       |
| Grid alignment   |  |     |     |         |                          |       |
| 1/4  | 1/4  | 1/4 | 1/4 | Section | Township                 | Range |
|  |  |     | SE  | 20      | 16 N                     | 5 E   |
|  |  | NE  | SW  | 20      | 16 N                     | 5 E   |
|  |  |     |     |         |                          |       |
|  |  |     |     |         |                          |       |
|  |  |     |     |         |                          |       |
| Comments See Figures 1 and 2 for the project location  |  |     |     |         |                          |       |
| Property ownership (Check all that apply)<br><input checked="" type="checkbox"/> Private <input type="checkbox"/> Local Government <input type="checkbox"/> State Government <input type="checkbox"/> Federal Government <input checked="" type="checkbox"/> Other |  |     |     |         |                          |       |
| Name of owner<br>Indianapolis Public Transportation Corporation (IPTC, dba IndyGo) Ascona REM Corp   |  |     |     |         |                          |       |
| Address of owner (number and street, city, state, and ZIP code)<br>1501 W. Washington St., Indianapolis, IN 46222 150 Hedgesdale Road, Brampton, ON L6T 5N5, Canada  |  |     |     |         |                          |       |

| PROJECT AREA DETAILS  |                                      |
|---|--------------------------------------|
| See Short Report instructions for required references to be consulted.  |                                      |
| Size of project area (hectares)<br>12.5   | Size of project area (acres)<br>30.9 |
| Natural region<br>Tipton Till Plain Section   | Topography<br>Upland Flat            |
| Soil(s) information<br>Multiple, see Comments   | Watershed<br>Driftwood               |
| Current land usage<br>Mixed Industrial, Civic   |                                      |
| Comments<br>UbaA Urban land-Brookston complex, 0 to 2 percent slopes<br>UcfA Urban land-Crosby silt loam complex, fine-loamy subsoil, 0 to 2 percent slopes<br>UcmB2 Urban land-Crosby-Miami silt loams complex, 2 to 4 percent slopes, eroded<br>UkbB2 Urban land-Miami silt loam complex, 2 to 6 percent slopes, eroded<br>YbvA Brookston silty clay loam-Urban land complex, 0 to 2 percent slopes |                                      |

| RECORDS CHECK   |   |
|---|---|
| <input checked="" type="checkbox"/> Records check only; no field investigation conducted.   | Date of records check (month, day, year)<br>January 5, 2023 |
| Records consulted (Check all that apply)<br><input checked="" type="checkbox"/> Archaeological site forms, reports in SHAARD, and SHAARD Archaeology and Structures Map Web Application<br><input type="checkbox"/> Cultural Resource Management reports, other research reports, etc., on file in locations other than SHAARD<br><input checked="" type="checkbox"/> Historical documents and maps from other institutions / resources<br><input type="checkbox"/> IHSSI / NRHP structures records in SHAARD<br><input checked="" type="checkbox"/> Cemetery records in SHAARD |   |
| <b>Within the Project Area</b>  |   |
| Previously recorded archaeological sites (Include citations)  |   |

|  |
|--|
| Previous archaeological studies within the project area <i>(Include citations)</i>   |
| Name(s) of previously recorded cemetery(ies)   |
| Cemetery registry number(s)  |
| <b>Outside the Project Area</b>  |
| Distance from boundary <i>(Check one)</i><br><input checked="" type="checkbox"/> Area researched was a half (½) mile radius from the boundary of the project area.<br><input type="checkbox"/> Area researched was a one (1) mile radius from the boundary of the project area.<br><input type="checkbox"/> Area researched was a two (2) mile radius from the boundary of the project area. |
| Previously recorded archaeological sites <i>(Include citations)</i>  |
| Previous archaeological studies <i>(Include citations)</i>   |
| ASC Group, Inc., (Snell 2011) completed Phase Ia survey on 15-ac along 38 <sup>th</sup> Street, north of the current project. No sites were documented, and no additional investigation was recommended.   |
| Name(s) of previously recorded cemetery(ies)   |
| Cemetery registry number(s)  |

| FIELD INVESTIGATION  |  |
|--|--|
| Date(s) of field investigation <i>(month, day, year)</i>   | Name of field supervisor                             |
| Names of field crew  |  |
| <b>Field Conditions</b>  |  |
| Surface visibility   | Factors affecting visibility                         |
| Slope  | Environmental (weather) conditions during the survey |
| <b>Methods</b>   |  |
| Surface survey <i>(Check all that apply)</i><br><div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Visual walkover<br/> <input type="checkbox"/> Pedestrian survey         </div> <div>           Interval: <input type="checkbox"/> Thirty (30) meters<br/> <input type="checkbox"/> Five (5) meters         </div> <div> <input type="checkbox"/> Other <i>(Describe below.)</i><br/> <input type="checkbox"/> Ten (10) meters<br/> <input type="checkbox"/> Other <i>(Describe below.)</i> </div> </div> |  |
| Describe methods.  |  |
| Shovel probes <i>(Check all that apply)</i>  |  |
| <input type="checkbox"/> Shovel probes      Interval: <input type="checkbox"/> Five (5) meters <input type="checkbox"/> Ten (10) meters <input type="checkbox"/> Fifteen (15) meters <input type="checkbox"/> Other <i>(Describe below)</i>  |  |
| The standard is screened shovel probes using ¼" size mesh. If shovel probes were not screened, or a different size mesh was utilized, an explanation must be provided in the methods below.  |  |
| Describe methods.  |  |
| Cores / auger probes <i>(Check all that apply)</i>   |  |
| <input type="checkbox"/> Cores / auger probes      Interval: <input type="checkbox"/> Five (5) meters <input type="checkbox"/> Ten (10) meters <input type="checkbox"/> Fifteen (15) meters <input type="checkbox"/> Other <i>(Describe below)</i>   |  |
| The standard is screened cores / auger probes using ¼" size mesh. If cores / auger probes were not screened, or a different size mesh was utilized, an explanation must be provided in the methods below.  |  |
| Describe methods.  |  |
| Additional field investigation comments  |  |

| RESULTS   |  |
|---|--|
| <p>Summary of relevant regional culture background</p> <p>The prehistoric peoples of Indiana follow the same general cultural sequence found in the surrounding Eastern Woodlands area of the United States. During the historical period, Delaware, Potawatomi, Shawnee, and particularly Miami populations occupied the central portion of the state (Barnhart and Riker 1971), many of whom were fleeing violence and oppression in other parts of the country. In 1816, the year Indiana gained statehood, the U.S. Congress donated four sections of federal land to establish a permanent seat of state government (Howard 1857). Two years later, under the 1818 Treaty of St. Mary's, the Delaware relinquished title to their tribal lands in central Indiana, agreeing to leave the area by 1821 (Bodenhammer and Barrows 1994). The availability of new federal lands for purchase in central Indiana attracted settlers, many of them descendants of families from northwestern Europe. Although many of these first European and American settlers were Protestants, a large proportion of the early Irish and German immigrants were Catholics (Howard 1857). Relatively few Black African Americans lived in Indianapolis before 1840. Indianapolis became a seat of county government on December 31, 1821, when Marion County, was established. Following the Civil War—and in the wake of the Second Industrial Revolution—Indianapolis experienced tremendous growth and prosperity. In 1880, Indianapolis was the world's third largest pork packing city, after Chicago and Cincinnati, and the second largest railroad center in the United States by 1888 (Bodenhammer &amp; Barrows 1994:23, 1483). By 1890, the city's population surpassed 100,000 (Britannica 2022). Some of the city's most notable businesses were founded during this period of growth and innovation, including L. S. Ayres (1872), Eli Lilly and Company (1876), Madam C. J. Walker Manufacturing Company (1910), Allison Transmission (1915), and 60 automakers. The city was also an early focus of labor organization (Britannica 2022).</p> |  |
| <p>Records check (<i>Check all that apply</i>)</p> <p><input checked="" type="checkbox"/> The project area does not have the potential to contain archaeological resources. <i>Provide explanation / justification.</i></p> <p><input type="checkbox"/> There are previously recorded archaeological resources within the project area, but those resources do not warrant additional archaeological investigation. <i>Provide explanation / justification.</i></p> <p><input type="checkbox"/> The project area contains previously recorded archaeological resources that warrant additional investigation and/or the project area has the potential to contain archaeological resources. <i>Provide explanation / justification.</i></p> <p style="padding-left: 20px;"><input type="checkbox"/> Based upon the records check results, a reconnaissance has been conducted.</p> <p><input type="checkbox"/> A cemetery is located within or adjacent to the project area.</p>  |  |
| <p>Explanation / justification</p> <p>The project area is located east and south of the eastern terminus of East 33<sup>rd</sup> Street, west of North Mitthoefer Road in Indianapolis (Figures 1 and 2). This location is characterized by patchy mixed industrial-commercial and residential developments, and is north of the former Cleveland, Columbus, Cincinnati and Indianapolis Railway corridor (Olson 2016). The specific project area is currently occupied by structures, pavement, sidewalks, and a pond. Google Earth's Wayback Imagery shows that since the mid-1990s, the project area has been fully developed and constructed upon (Google 2023). The project area appears to be entirely disturbed from the construction of buildings, utilities, and a man-made stormwater detention pond.</p>   |  |
| <p>Phase 1a archaeological reconnaissance (<i>Check all that apply</i>)</p> <p><input checked="" type="checkbox"/> No Phase 1a reconnaissance was conducted.</p> <p><input type="checkbox"/> Phase 1a reconnaissance located no archaeological resources.</p> <p><input type="checkbox"/> Previously recorded sites were in the project area.</p> <p style="padding-left: 20px;"><input type="checkbox"/> Artifacts and/or features at a previously recorded site(s) within the project area were not discovered. <i>List the site(s) below.</i></p> <p><input type="checkbox"/> Phase 1a reconnaissance has identified landforms conducive to buried archaeological deposits. <i>Describe below.</i></p>   |  |
| <p><i>List sites.</i></p><br><br><br>   |  |
| <p><i>Describe landforms.</i></p><br><br><br>   |  |
| <p>Number of shovel probes excavated</p>  | <p>Number of cores / auger probes</p>      |
| <p><i>Describe disturbances. Attach photographs documenting disturbances.</i></p> <p>The project area is located in a complex of industrial and retail buildings, north of the East 30<sup>th</sup> Street corridor (Figures 1 and 2). Given the well-documented history of ground disturbance at this area, the chances of field survey locating in situ archaeological remains is extremely low. As such, no sub-surface investigation was conducted.</p>   |  |
| <p>Actual area surveyed (<i>hectares</i>)</p>   | <p>Actual area surveyed (<i>acres</i>)</p> |
| <p><i>Explain results of fieldwork.</i></p><br><br><br>   |  |

|                 |
|-----------------|
| RECOMMENDATIONS |
|-----------------|

Records check (Check all that apply)

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

Phase 1a archaeological reconnaissance (Check all that apply)

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

Other recommendations / commitments

It is recommended that the project be allowed to proceed without further investigations.

**Pursuant to IC-14-21-1, if any archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and 29) requires that the discovery must be reported to the Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646.**

REQUIRED ATTACHMENTS

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

Other attachments

Above-ground cultural resources assessment.

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

Barnhart, John D., and Dorothy L. Riker

1971 Indiana to 1816: The Colonial Period. Indiana Historical Bureau and Indiana Historical Society, Indianapolis, Indiana.

Bodenhamer, David J. and Robert G. Barrows, editors

1994 The Encyclopedia of Indianapolis. Indiana University Press, Indianapolis.

Britannica, The Editors of Encyclopaedia.

2023 Indianapolis. Encyclopedia Britannica. <https://www.britannica.com/place/Indianapolis-Indiana>. Accessed January 2023.

Google

2023 Google Earth Wayback Imagery. Accessed January 2023.

Howard, A. C.

1857 A. C. Howard's Directory for the City of Indianapolis: Containing a Correct List of Citizens' Names, Their Residence, and Place of Business, with a Historical Sketch of Indianapolis from its Earliest History to the Present Day. A. C. Howard, Indianapolis.

Olson, Arthur Andrew, III

2016 Forging the Bee Line Railroad, 1848–1889: The Rise and Fall of the Hoosier Partisans and Cleveland Clique. Kent State University Press, Kent, Ohio.

Snell, Samuel P.

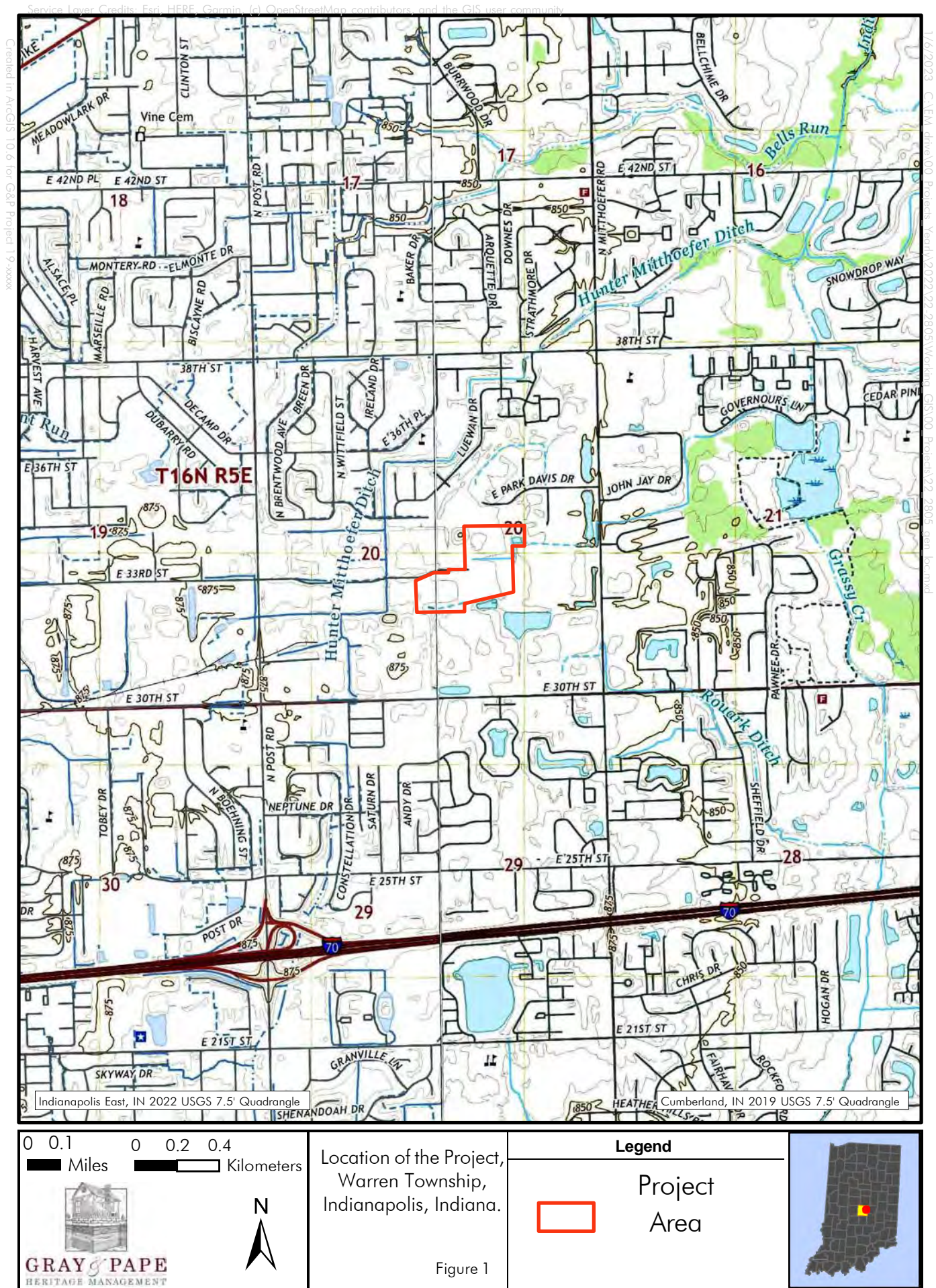
2011 Phase Ia Archaeological Survey for the Proposed 38<sup>th</sup> Street Improvements between Post Road and Mitthoeffer Road (Des. No. 1173051, DPW Project No. ST-20-046) in Indianapolis, Warren and Lawrence Townships, Marion County, Indiana. Prepared by ASC Group, Inc., Indianapolis. Prepared for Crawford, Murphy & Tilly, Inc., Indianapolis, Indiana.

Comments

CURATION

Location of project documentation

IDNR-DHPA



Created in ArcGIS 10.8 for G&P Project 22-2805.001

1/10/2023 C:\EM\_drive\00 Projects Yearly\2022\22-02805\Working GIS\00 Projects\22-2805\_001\_1fr\_review.mxd

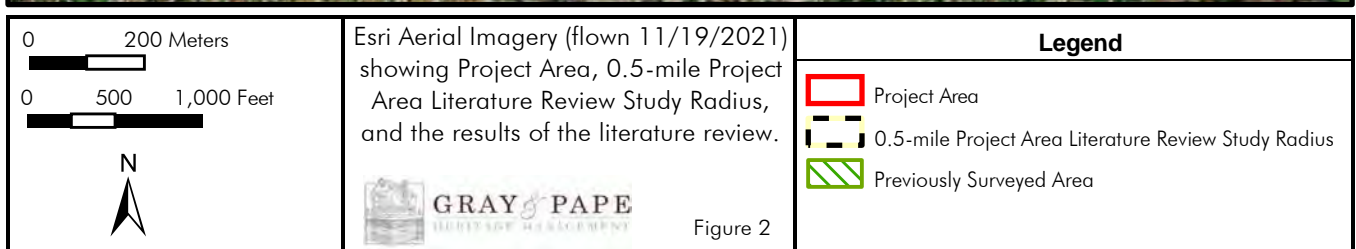




Figure 3. Google Earth Imagery flown 3/22/1992 showing Project Area location in orange.

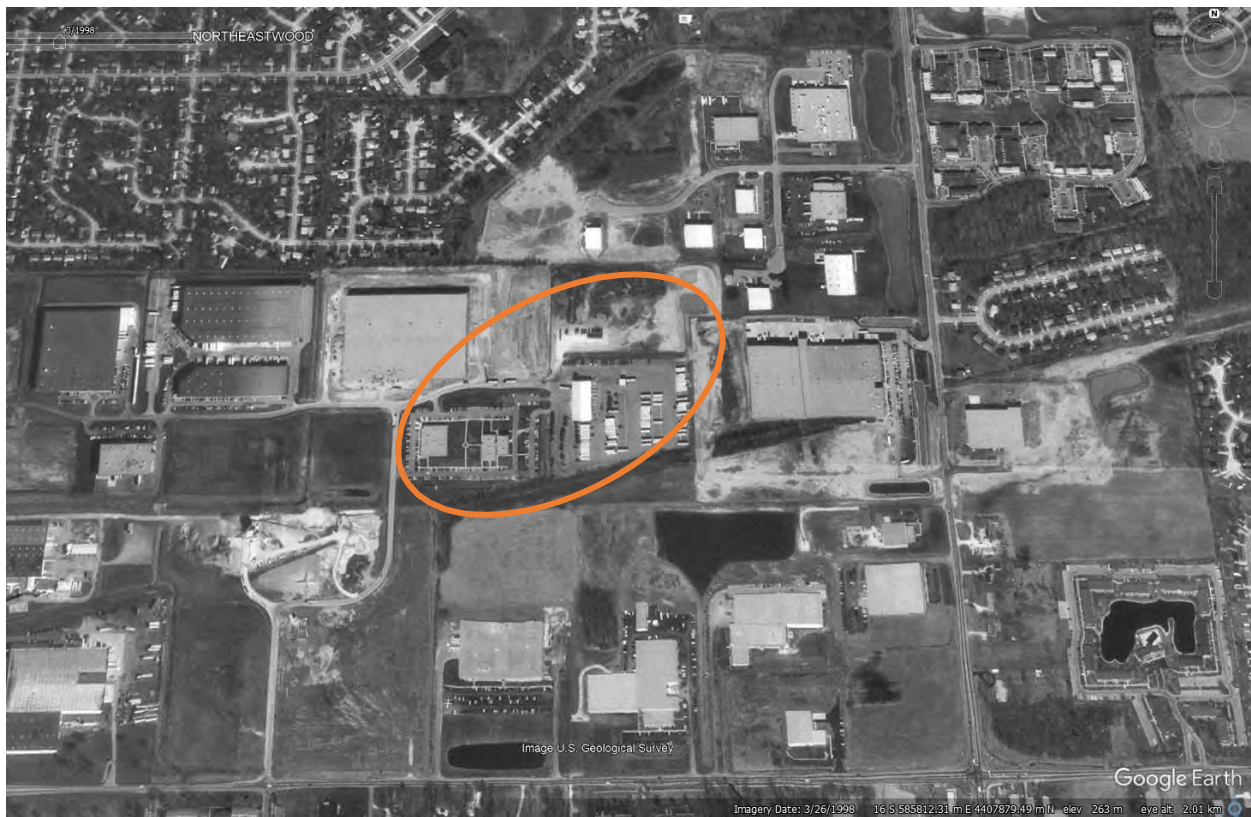


Figure 4. Google Earth Imagery flown 3/26/1996 showing Project Area location in orange. Note the ongoing industrial construction in the Project Area.

Indianapolis Public Transportation Corporation (IPTC, dba IndyGo), with funding from the Federal Transit Administration (FTA), proposes improvements to and expansion of the IndyGo East Campus, located at 9503 E. 33<sup>rd</sup> Street off Post Road, in Indianapolis, Marion County, Indiana. Pursuant to 36 CFR Section 800.4(d)(1) of the Section 106 of the National Historic Preservation Act (NHPA), the following documentation is being provided to support a finding of “No Historic Properties Affected” for this undertaking.

## 1. DESCRIPTION OF THE PROJECT UNDERTAKING

IndyGo’s existing headquarters, located just west of downtown Indianapolis at 1501 W. Washington Street, has been determined to be inadequate to accommodate growth resulting from implementation of the Marion County Transit Plan. The facility currently houses administrative staff, a bus garage and maintenance facility under one roof. An engineering review of the existing facility plans, combined with IndyGo’s experiences trying to accommodate the already expanding fleet within the current footprint provide the basis for this conclusion.

IndyGo therefore purchased the property at 9503 E. 33<sup>rd</sup> Street in 2020 with local funds (see Figures 1, 2, and 5 for project area and property details). The site will become IndyGo’s new headquarters and “East Campus”. The existing facility at 1501 W Washington will continue to operate as a garage and maintenance facility with some administrative staff remaining for support.

Two existing buildings have been renovated at the 9503 E 33<sup>rd</sup> St property to house administrative staff. The majority of that work occurred in 2022 and will be fully completed in early 2023. Administrative staff will move to the site this summer. IndyGo next desires to construct a new fleet terminal and maintenance facility on the site to accommodate its growing fleet and their operational needs. The new facility will provide bus storage, maintenance bays, and supporting spaces for offices, driver support areas, parts storage, and similar supporting functions.

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The property at 9625 E. 33<sup>rd</sup> Street is not currently owned by IndyGo. The current property owners have not been willing to grant access to the site for surveys or other field work. Both the 9503 and 9625 E 33<sup>rd</sup> Street parcels were formerly owned by truckload shipping company Celadon, which used the site for its headquarters, storage of vehicles, vehicle maintenance, fueling and training. The NEPA evaluation that is currently underway – as well as the assessment detailed in this document – covers the proposed work associated with both parcels.

Please refer to the IndyGo East Campus Conceptual Site Layout on Figure 5.

## 2. EFFORTS TO IDENTIFY HISTORIC PROPERTIES

Qualified Professional architectural historians with Gray and Pape Heritage Management (Carpenter), meeting the Secretary of Interior’s Professional Qualification standards [48 Federal Register (FR) 44716] reviewed the project undertaking and conducted a site visit to determine the Area of Potential Effects (APE). *The APE is defined as the “geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The APE is influenced by the scale and nature of an undertaking...”* (36 C.F.R. 800.9 [a]), in which to identify any properties listed on or eligible for listing on the National Register of Historic Places (National Register).

The IndyGo East Campus Expansion project area is located within a complex of manufacturing and industrial facilities and corporate offices that primarily date to the late 20<sup>th</sup> century. The proposed APE for the undertaking

was drawn to include areas of potential physical, visual, auditory, and atmospheric effects that may result from the undertaking. As the project occurs in a modern non-residential setting, effects are not expected to extend beyond the facilities neighboring the existing and proposed IndyGo improvements. Specifically, the APE extends beyond the project area past other structures and features that block views of the proposed actions. At its southern boundary, the APE runs along 30<sup>th</sup> Street, before zigzagging northward behind offices and manufacturing facilities towards Mitthoefer Road, the eastern boundary of the APE. From Mitthoefer Road, the APE extends north beyond additional manufacturing facilities and turns west along a tree line and follows those trees to the southwest, and then extends southward behind more structures, a concrete plant, and a large parking lot before meeting 30<sup>th</sup> Street. The existing buildings surrounding the project and vegetation at the northwest section of the APE provided visual screening of the project. Further, the APE extends beyond the noise screening distances prescribed by FTA, for the operations and maintenance functions of the facility.

The FTA provided an *Initiation of Section 106 Consultation Process and Area of Potential Effects (APE) Determination* to the Indiana State Historic Preservation Officer (IN SHPO) in a letter dated November 23, 2022 (see Appendix B). In the correspondence, the FTA described the undertaking and requested SHPO's comments on the determination of the APE. In a letter dated December 22, 2022, the IN SHPO responded that they were in concurrence with the suggested APE.

#### *Above-Ground Resource Assessment*

Pursuant to 36 CFR § 800.4(b), Gray & Pape architectural historians referenced the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) of the Division of Historic Preservation and Archaeology (DHPA). SHAARD includes a database of previously surveyed above-ground resources, including data from the Indiana Historic Sites and Structures Inventory (IHSSI), the State and National Register of Historic Places (NRHP) inventory, the 2009 INDOT-sponsored Historic Bridge Inventory (HBI), and the Indiana Cemetery and Burial Ground Registry. Further, the literature review included review of the Indiana Historic Buildings, Bridges and Cemeteries Map (IHBBC Map) that provides geospatial representation of the inventory data in SHAARD.

Based on review of SHAARD and the IHBBC Map, two previously surveyed properties were identified, and they include: IHSSI Site #097-144-65007 (house) and IHSSI Site #097-144-65008 (farm). These properties are no longer extant. No other surveyed properties are located within the APE.

Historic aerial mapping, available on MapIndy ([MapIndy](#)) and accessed on November 15, 2022, shows the APE was in primarily agricultural use until at least 1979 (Figure 6). The two demolished properties are still extant in 1979, located at the east quadrant of the APE off Mitthoefer Road. The 1979 shows residential and industrial development surrounding the APE and some early construction activity occurring on the southern boundary of the APE at 30<sup>th</sup> Street. No structures extant today appear on the 1979 aerial. By 1986, a concrete plant and a Finish Line distribution center are the only structures located within the APE.

While there are residential developments surrounding the APE older than 50-years old, due to the dense built environment, including existing manufacturing and industrial facilities, and vegetation screening particularly at the northern boundary of the APE, these were deemed to not be within the APE.

Gray & Pape architectural historians, confirmed through a site visit conducted on November 16, 2022, that no structures located within the APE were older than 50 years old. The oldest structures in the APE, the concrete plant and Finish Line distribution center, were built after 1980, making them approximately 42 years old. No structures within the APE exhibit a requisite level of significance to be evaluated under the National Register Criteria Consideration G for properties having achieved significance within the last fifty years.

Therefore, based on the information obtained from the literature review and confirmed by the site visit, no structures within the APE were formally evaluated for the National Register.

Representative photographs of the APE and structures within are located in Appendix A.

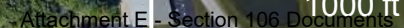
### 3. BASIS FOR FINDING

A finding of "No Historic Properties Affected" is appropriate for this undertaking because there are no resources listed in, or eligible for listing in, the National Register within the APE.

The public will be afforded an opportunity to comment by publication of the Section 106 finding and project description on the IndyGo website simultaneously with SHPO's review. If appropriate, this document will be revised after the expiration date of the public comment period.



# NORTHEASTWOOD



# IndyGo East Campus-1979 Aerial



1979 Aerial Photography

High : 255

Low : 35

1:9,028  
0 0.075 0.15 0.3 mi  
0 0.1 0.2 0.4 km

Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community




Figure 6. Project APE on 1979 aerial map.

**Appendix A:**  
**IndyGo East Campus Expansion-Photographs of Views  
and Select Resources within the APE**




| Photograph  |  | View Description  |
|---|--|---|
|    |  | <p>Photo 1: Charnock Street from 30<sup>th</sup> Street; Looking north</p>                          |
|   |  | <p>Photo 2: Charnock Street from 30<sup>th</sup> Street; Looking northeast towards project area</p> |
|  |  | <p>Photo 3: Concrete plant; Looking north</p>   |

| Photograph  | View Description  |
|---|---|
|    | <p>Photo 4: Specialties Company from Charnock Street; Looking East</p>                          |
|   | <p>Photo 5: Gordon Food Service from E. 33<sup>rd</sup> Street; Looking South</p>               |
|  | <p>Photo 6: E. 33<sup>rd</sup> Street; Looking East Towards IndyGo East Campus/Project Area</p> |

| Photograph  | View Description  |
|---|---|
|    | <p>Photo 7: H.T. Hackney Company Building from E. 33<sup>rd</sup> Street; Looking Northeast</p>                 |
|   | <p>Photo 8: IndyGo East Campus from E. 33<sup>rd</sup> Street; Looking Southeast</p>                            |
|  | <p>Photo 9: Looking East Towards the Proposed IndyGo Maintenance Facility at 9625 E. 33<sup>rd</sup> Street</p> |

| Photograph  | View Description   |
|---|--|
|    | <p>Photo 10: E. 33<sup>rd</sup> Street; Looking Southeast towards Proposed IndyGo Fleet Terminal/Operations Center</p> |
|   | <p>Photo 11: Finish Line Distribution from E.33<sup>rd</sup> Street; Looking Northeast</p>                             |
|  | <p>Photo 12: Kenworth Building from E. 33<sup>rd</sup> Street; Looking Northeast</p>                                   |

| Photograph  | View Description   |
|---|--|
|    | <p>Photo 13: Superior Metals; Looking Northeast</p>  |
|   | <p>Photo 14: Superior Metals Building to Right; Looking North Towards Proposed IndyGo Maintenance Facility</p> |
|  | <p>Photo 15: FinishLine Building from Mitthoefer Road; Looking Northeast</p>                                   |

| Photograph  | View Description   |
|---|--|
|    | <p>Photo 16: System Technologies from Conveyer Drive and Mitthoefer Drive; Looking Southwest</p> |
|   | <p>Photo 17: Sports Graphics Inc. Building from Mitthoefer Road; Looking Southwest</p>           |
|  | <p>Photo 18: United Hospital Services, LLC from E. Park Davis Drive; Looking Northwest</p>       |

| Photograph  | View Description   |
|---|--|
|    | <p>Photo 19: E. Park Davis Drive; Looking West</p>   |
|   | <p>Photo 20: E. Park Davis Drive; Looking East</p>   |
|  | <p>Photo 21: Fabricated Steel Corporation Building from E. Park Davis Drive; Looking South</p> |

| Photograph  | View Description   |
|---|--|
|    | <p>Photo 22: Pure Water Partners Building from E. Park Davis Drive; Looking South</p>                |
|   | <p>Photo 23: View of Northwest Corner of APE; H.T. Hackney Building in background; Looking West.</p> |
|  | <p>Photo 24: View of Treeline that Defines Northwest Corner of APE; Looking Northwest</p>            |

| Photograph  | View Description   |
|---|--|
|    | <p>Photo 25: Smock Material Handling Co. Building; Looking South</p> |
|   | <p>Photo 26: View of Park Davis Circle: Looking North</p>            |
|  | <p>Photo 27: Performance Tire Service Co.; Looking Northwest</p>     |

| Photograph   | View Description   |
|--|--|
|   | <p>Photo 28: Northern APE Boundary<br/>From; From Outside APE; Looking<br/>Southeast</p> |
|  | <p>Photo 29: Northern APE Boundary;<br/>From Outside APE; Looking East</p>               |

## Appendix B: Correspondence



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

REGION V  
Illinois, Indiana,  
Michigan, Minnesota,  
Ohio, Wisconsin

200 West Adams Street  
Suite 320  
Chicago, IL 60606-5253  
312-353-2789  
312-886-0351 (fax)

November 23, 2022

Beth K. McCord  
Director for Environmental Review  
Division of Historic Preservation and Archaeology  
Indiana Department of Natural Resources  
402 W. Washington Street, W274  
Indianapolis, Indiana 46204

RE: Initiation of Section 106 Consultation Process and Area of Potential Effects (APE)  
Determination for the IndyGo East Campus Project in Indianapolis, Indiana

Dear Ms. McCord:

As part of its responsibilities under 36 CFR Part 800 – Protection of Historic Properties and the National Historic Preservation Act (NHPA), the Federal Transit Administration (FTA) is initiating a Section 106 Consultation Process for the East Campus Project, proposed by IndyGo. FTA has determined that the proposed project will be a Federal undertaking as defined in 36 CFR § 800.16(y) and that it is a type of activity that has the potential to cause effects on historic properties.

IndyGo's existing headquarters, located just west of downtown Indianapolis at 1501 W. Washington Street, has been determined to be inadequate to meet these needs on its own. The facility houses administrative staff, a bus garage and maintenance facility under one roof. An engineering review of the existing facility plans, combined with IndyGo's experiences trying to accommodate the already expanding fleet within the current footprint provide the basis for this conclusion. IndyGo desires to use the 9625 E. 33rd Street property to construct the fleet terminal and maintenance facility that was originally being designed to fit within the boundaries of the 9503 E. 33rd St property. Additionally, this new property would accommodate operator training track and employee parking. It is intended for this to be surface parking, although there may be a long term need for structured parking as the site is built out. The fleet terminal is expected to span the two parcels. The new operations and maintenance facility will be used seven days a week, with individuals arriving as early as 3:00 am on weekdays to begin each day's operations. Vehicles will be arriving back at the site as late as 1:00 am to end each 'day'. Weekend operating hours will be shorter. The administrative functions in Buildings A and B will operate during regular working

hours (generally 8 am to 5 pm) on weekdays.

In compliance with Section 106 of the NHPA, and in accordance with the procedures related to the identification of historic properties described in the implementing regulations at 36 CFR Part 800, FTA has determined the attached Area of Potential Effects (APE) accounting for direct effects at the proposed Project location and indirect visual effects within the viewshed of the proposed Project location. This correspondence serves as documentation of our determination of the APE, pursuant to 36 CFR § 800.4(a)1.

FTA requests you provide any comments on our determination of the APE following your review of the enclosures. Your timely response will greatly help us incorporate your concerns into the development of the project. For that purpose, we respectfully request that you provide comments within 30 days of receiving this correspondence. Thank you in advance for your assistance on this project. Please contact me at 312-353-1653 or [jason.ciavarella@dot.gov](mailto:jason.ciavarella@dot.gov) with any questions.

Sincerely,

Jay M. Ciavarella  
Director, Office of Planning and Program Development

cc: Cecilia Crenshaw, FTA Region V  
Jocelyn Hoffman, FTA Region V  
Jennifer Pyrz, IndyGo

Enclosure:  
APE Map

**IndyGo East Campus-Draft APE**  
NORTHEAST WOOD



APE

New Test Track

Employee Parking

Maintenance Facility

Fleet Terminal/  
Operations Center

IndyGo East Campus 9625 E 33rd  
Street Proposed Acquisition

IndyGo East Campus 9503 E 33rd  
Street Purchased in 2020

**Legend**



Renovation-existing building



Proposed new building,  
conceptual

Google Earth

IndyGo East Campus Expansion

E-29

Attachment E - Section 106 Documents

1000 ft



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 22, 2022

Jay Ciavarella  
Director, Office of Planning and Program Development  
Federal Transit Administration, Region V  
200 West Adams Street, Suite 320  
Chicago, Illinois 60606-5253

Federal Agency: Federal Transit Administration ("FTA")

Re: Initiation of Section 106 Consultation Process and Area of Potential Effects (APE) Determination for the  
IndyGo East Campus Project at 9625 East 33rd Street (DHPA No. 30100)

Dear Mr. Ciavarella:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. §306108), and implementing regulations of 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO" or "DNR-DHPA") has reviewed your November 23, 2022, letter, with enclosures, which we received the same day for the above-indicated project in the City of Indianapolis, Marion County, Indiana.

In your next correspondence on this project, please let us know who has been invited to participate in the Section 106 consultation on this federal undertaking and which of the invited consulting parties have accepted FTA's invitation.

For the purposes of the Section 106 review of this undertaking, the proposed above-ground area of potential effects appears to be appropriate, given our current understanding of the project.

We note that the submission did not include information regarding potential project impacts to archaeological resources. Once the indicated 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.

If you have questions about archaeological matters pertaining to this project, please contact Wade Tharp at (317) 232-1650 or wtharp1@dnr.in.gov. Questions about buildings or structures should be directed to Toni Lynn Giffin at (317) 233-2803 or tgiffin@dnr.in.gov.

In all future correspondence regarding the IndyGo East Campus Project, please refer to DHPA No. 30100.

Very truly yours,

Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:TLG:WTT:wt

emc: Jay Ciavarella, FTA Region V  
Cecilia Crenshaw, FTA Region V  
Jocelyn Hoffman, FTA Region V, FTA Region V  
Jennifer Pyrz, IndyGO  
Austin Gible, IndyGo Super-Stops Project Manager  
Chad Slider, Indiana DNR-DHPA  
Toni Giffin, Indiana DNR-DHPA  
Danielle Kauffmann, Indiana INDNR-DHPA  
Wade T, Tharp, Indiana DNR-DHPA

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 13, 2023

Jay Ciavarella  
Director, Office of Planning and Program Development  
Federal Transit Administration, Region V  
200 West Adams Street, Suite 320  
Chicago, Illinois 60606-5253

Federal Agency: Federal Transit Administration (“FTA”)

Re: Section 106 Determinations of Eligibility and Effects, Indiana archaeological short report (Connolly, 01/10/2023), and Identification of Historic Properties; for the IndyGo East Campus Project at 9625 East 33rd Street, in the City of Indianapolis, Marion County, Indiana (DHPA No. 30100)

Dear Mr. Ciavarella:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. §306108), and implementing regulations of 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer (“Indiana SHPO” or “Indiana DNR-DHPA”) has reviewed your November 23, 2022, letter, with enclosures, which we received November 23, 2022, for the above-indicated project in the City of Indianapolis, Marion County, Indiana (DHPA No. 30100).

For the purposes of the Section 106 review of this undertaking and based on the information provided in the Above Ground Assessment attachment, we agree that there are no NRHP-eligible or listed above-ground resources in the APE. Additionally, we agree that no new potentially eligible resources were identified.

In terms of impacts of proposed project-related ground-disturbing activities to archaeological resources, based upon the submitted information and the documentation available to the staff of the Indiana SHPO, we have not identified any currently known archaeological resources listed in or eligible for inclusion in the NRHP within the proposed project area. However, this identification is subject to the ground-disturbing project-related activities remaining within areas disturbed by previous construction of a recent and non-historical nature. If archaeological deposits are encountered from the post-contact period, they will be evaluated regarding their eligibility for the NRHP in consultation with the staff of the Indiana SHPO. Please contact our office if such deposits are encountered. The archaeological recording must be done in accordance with the Secretary of the Interior’s “Standards and Guidelines for Archaeology and Historic Preservation” (48 F.R. 44716) and a report of the archaeological documentation must be submitted to our office for review and comment.

If any prehistoric or historic archaeological artifacts or human remains are uncovered during construction, demolition, or earthmoving activities, state law (Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29) requires that the discovery be reported to the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology within two (2) business days. In that event, please call (317) 232-1646. Be advised that adherence to Indiana Code 14-21-1-27 and Indiana Code 14-21-1-29 does not obviate the need to adhere to applicable federal

statutes and regulations, including but not limited to 36 C.F.R. Part 800.

If you have questions about buildings, structures, or districts pertaining to this project, please contact Toni Lynn Giffin at (317) 233-2803 or [tgiffin@dnr.in.gov](mailto:tgiffin@dnr.in.gov). Questions about archaeological matters should be directed to Wade T. Tharp at (317) 233-1650 or [wtharp1@dnr.in.gov](mailto:wtharp1@dnr.in.gov).

In all future correspondence regarding the IndyGo East Campus Project, please refer to DHPA No. 30100.

Very truly yours,

A handwritten signature in black ink, appearing to read "B. K. McCord". The signature is fluid and cursive, with the first name "Beth" and last name "McCord" clearly distinguishable.

Beth K. McCord  
Deputy State Historic Preservation Officer

BKM:TLG:WTT:wt

emc: Jay Ciavarella, FTA Region V  
Cecilia Crenshaw, FTA Region V  
Anshu Singh, FTA Region V  
Jennifer Pyrz, IndyGO  
Toni Giffin, Indiana DNR-DHPA  
Wade T, Tharp, Indiana DNR-DHPA