

Appendix E-4
Finding Documentation

Part 1 of 5

**INTERSTATE 81 (I-81) VIADUCT PROJECT
ONONDAGA COUNTY
FINDING DOCUMENTATION
SECTION 106 EFFECT FINDING
PIN 3501.60
SHPO PROJECT REVIEW NUMBER: 16PR06314
April 2021**

1. PROJECT DESCRIPTION

OVERVIEW

The New York State Department of Transportation (NYSDOT) proposes the I-81 Viaduct Project (the Project) in coordination with the Federal Highway Administration (FHWA), serving as the federal lead agency under the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act. The Section 106 review process is being progressed in accordance with implementing regulations, 36 CFR Part 800 – *Protection of Historic Properties*, as amended, and in coordination with the preparation of an Environmental Impact Statement (EIS) under NEPA. This Finding Documentation has been prepared pursuant to the standards specified in 36 CFR §800.11(e), applicable to findings of no adverse effect and adverse effect.

The Project includes the proposed reconstruction or replacement of the elevated portions of Interstate 81 (the I-81 viaduct) through the City of Syracuse, in Onondaga County, New York as illustrated in Figure 1 (**see Appendix A, Figures**). The purpose of the Project is to address structural deficiencies and non-standard highway features while creating an improved transportation corridor through the City of Syracuse that meets the needs and provides the infrastructure to support long-range transportation planning efforts.

The objectives of the Project are to:

- Address the transportation network structural deficiencies, particularly associated with aging bridge structures and non-standard/non-conforming design features within the project limits along I-81 and I-690.
- Address vehicular, pedestrian, and bicycle geometric and operational deficiencies within the project limits.
- Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., business districts, hospitals, and institutions) within neighborhoods within and near Downtown Syracuse.
- Maintain or enhance the vehicular, pedestrian, and bicycle connections in the local street network within the project limits in and near Downtown Syracuse to allow for connectivity between neighborhoods, the business districts, and other key destinations.
- Maintain access to existing local bus service and enhance transit amenities within the project limits in and near Downtown Syracuse.

The Project involves segments of I-81 in Onondaga County, New York, as well as modifications to Interstate 690 (I-690), Interstate 481 (I-481), and related highway interchanges and local streets see Figure 1 in **Appendix A, Figures**. I-81 and I-690 are elevated through Downtown Syracuse. The I-81/I-690 interchange and viaduct comprise 33 highway bridges, with 17 additional bridges along the I-81/I-690 interchange approaches. These bridge structures were constructed primarily in the 1960s. Several local and regional long-range plans have established goals for the regional transportation network, and/or have identified I-81, particularly the I-81 viaduct, as an influential feature within Downtown Syracuse and adjacent neighborhoods. The I-81 viaduct and I-690 interchange are visually prominent elevated features in Downtown Syracuse.

DESCRIPTION OF BUILD ALTERNATIVES

The following summary describes the two Build alternatives that are evaluated in the Project Draft EIS. See Figures 3 and 4 in **Appendix A, Figures**.

Viaduct Alternative

The Viaduct Alternative would involve a full reconstruction of I-81 between approximately Colvin Street and Hiawatha Boulevard and full reconstruction of I-690 between Leavenworth Avenue and Lodi Street. The existing viaduct would be demolished and replaced by a new viaduct, which would provide four 12-foot travel lanes, as well as inside and outside shoulders. The new viaduct generally would be approximately 10 to 15 feet higher than the existing viaduct, which is approximately 20 feet tall, and it would have a wider transportation footprint than the 66-foot-wide existing viaduct.

Major elements of the Viaduct Alternative, such as interchange modifications, bridge replacements, and other features, include:

- A new partial interchange, with a northbound exit ramp and a southbound entrance ramp, would be constructed on I-81 at MLK, Jr. East.
- At I-81 Interchange 18 (Harrison/Adams Streets), a second exit lane to Harrison Street from southbound I-81 would be added.
- I-690 would be reconstructed from Leavenworth Avenue to Lodi Street. The existing ramps between I-690 and I-81 would be reconstructed. New ramps would be built to provide direct connections, which are unavailable today, between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690.
- I-81 Interchanges 19 (Clinton Street/Salina Street) and 20 (Franklin Street/West Street) would be combined into one partial interchange. This interchange consolidation would involve replacing the existing off-ramps with a single ramp that would serve Clinton Street, and the existing on-ramps with a single, two-lane ramp at Pearl Street.
- The Butternut Street overpass would be rebuilt in a new location, over existing Genant Drive, to connect to North Clinton and North Franklin Streets, and the existing bridge would be demolished. Existing Butternut Street would be removed from alt to Franklin Streets.

- North Clinton Street and portions of intersecting streets would be reconstructed from Bear Street to existing Genant Drive and extended to connect with North Franklin Street.
- The segment of I-81 from I-690 to Hiawatha Boulevard (Interchange 20 to Interchange 24) would be widened to provide four through lanes in each direction.
- The Court Street interchange (Interchange 21) would be reconstructed. The two northbound I-81 entrance and exit ramps would be lengthened; the two southbound I-81 ramps would be relocated to connect to North Clinton Street between Court Street and Bear Street.
- The Court Street, Bear Street, and Spencer Street bridges would be replaced with new structures.
- The Route 370 (Onondaga Lake Parkway) on-ramp (Interchange 24A) and Old Liverpool Road on-ramp (Interchange 24B) to southbound I-81 would be consolidated into a single ramp.
- I-690 Interchange 11/12 (West Street/West Genesee Street) would be replaced with a new interchange, controlled by a traffic signal on West Street. Just south of the new interchange, West Street would be lowered to meet West Genesee Street, creating an at-surface intersection. In addition, the ramp from West Street to Herald Place and the ramp from North Franklin Street to West Street would be removed.
- A new path along the west bank of Onondaga Creek between Erie Boulevard and Evans Street would be constructed, providing views, which are now obstructed, of a historic Erie Canal aqueduct and stone bridge over the Creek. Two ramps between northbound West Street and an elevated portion of Erie Boulevard would be replaced with a single connector roadway.
- The westbound exit ramp from I-690 to Townsend Street, and the existing on-ramp to eastbound I-690 from McBride Street, would be relocated to Catherine Street.

The Viaduct Alternative would include new bicycle and pedestrian facilities to improve connectivity between existing and proposed facilities within the project limits, as well as specific local street improvements.

Community Grid Alternative

The Community Grid Alternative would involve the demolition of the existing viaduct between the New York, Susquehanna and Western (NYS&W) Railway bridge and the I-81/I-690 interchange, and the replacement of the viaduct with a street-level arterial. The portion of existing I-81 between its northern and southern intersections with I-481 would be re-designated as a business loop of I-81 (BL 81). The section of I-81 between the southern I-81/I-481 interchange (Interchange 16A) and the I-81/I-481 northern interchange (Interchange 29) in Cicero would be de-designated as an interstate, and existing I-481 would be re-designated as the new I-81.

The new I-81 would carry a minimum of four travel lanes (two in each direction) of through traffic. The existing I-81/I-481 South Interchange (Interchange 16A) and I-81/I-481 North Interchange (Interchange 29) would be reconstructed. Other modifications, including the addition of auxiliary lanes, new signage, and renumbered interchanges, would be implemented as part of the re-designation.

Major elements of the Community Grid Alternative, such as interchange modifications, bridge replacements, and other features, include:

- BL 81 would come to grade just south of MLK, Jr. East, and a roundabout would be installed at MLK, Jr. East.
- A new northbound BL 81 exit ramp to East Colvin Street would be constructed between the highway and the NYS&W Railway bridge.
- The existing NYS&W Railway bridge would be reconstructed to accommodate the alignment of BL 81, which would pass beneath the bridge.
- I-690, including the former I-81/I-690 interchange, would be reconstructed from Leavenworth Avenue to Beech Street. Two of the existing six ramps between former I-81 and I-690 would be reconstructed, and the other four existing ramps would be removed.
- A new, full I-690 interchange would be constructed at Crouse and Irving Avenues.
- Interchange 13, which consists of an eastbound I-690 entrance ramp from McBride Street and the existing westbound I-690 exit ramp to Townsend Street, would be removed.
- Pearl Street would be extended from Willow Street to Erie Boulevard East, as it was historically, and Oswego Boulevard would be reconstructed, realigned, and extended to Willow Street as it was historically.
- Existing Interchanges 19 (Clinton Street/Salina Street) and 20 (Franklin Street/West Street) would be combined into one interchange. The existing off-ramps would be replaced with a single ramp that serves Clinton Street and Oswego Boulevard, and the existing on-ramps would be replaced by a single, two-lane ramp at Pearl Street.
- The Butternut Street overpass would be rebuilt in a location just north of the existing bridge, connecting at the same points it does today.
- North Clinton Street and portions of intersecting streets would be reconstructed from Bear Street to existing Genant Drive and extended to connect to a new intersection with Butternut Street.
- The westbound I-690 on-ramp from Bear Street would be lengthened, select portions of Bear Street and its intersections will be widened, raised medians will be added, left and right turn lanes at Spencer Street and Clinton Street will be added, sidewalk improvements will be made.
- The segment of I-81 from I-690 to Hiawatha Boulevard (Interchange 20 to Interchange 24) would be widened to provide four through lanes in the northbound direction; the southbound section would be maintained with three lanes.
- The Court Street interchange (Interchange 21) would be reconstructed. The two northbound BL 81 entrance and exit ramps would be lengthened; the two southbound BL 81 ramps would be relocated to connect to North Clinton Street between Court Street and Bear Street.
- The Court Street, Bear Street, and Spencer Street bridges would be replaced with new structures.

- The Route 370 (Onondaga Lake Parkway) on-ramp (Interchange 24A) and Old Liverpool Road on-ramp (Interchange 24B) to southbound BL 81 would be consolidated into a single ramp.
- I-690 Interchange 11/12 (West Street/West Genesee Street) would be replaced with a new interchange, controlled by a traffic signal on West Street. Just south of the new interchange, West Street would be lowered to meet West Genesee Street, creating an at-surface intersection. In addition, the ramp from West Street to Herald Place and the ramp from North Franklin Street to West Street would be removed.
- Existing I-481 would be reconfigured at Exit 3 (New York State Route 5/92). The existing I-481 southbound to westbound Route 5/92 exit ramp would be widened and improved to accommodate turns onto both westbound and eastbound Route 5/92.
- A new path along the west bank of Onondaga Creek between Erie Boulevard and Evans Street would be constructed, providing views, which are now obstructed, of a historic Erie Canal aqueduct and stone bridge over the Creek. Two ramps between northbound West Street and an elevated portion of Erie Boulevard would be replaced with a single connector roadway.

The Community Grid Alternative would include new bicycle and pedestrian facilities to improve connectivity between existing and proposed facilities within the project limits, as well as specific local street improvements.

AREA OF POTENTIAL EFFECTS

In accordance with 36 CFR §800.16(d), the area of potential effects (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, if such properties exist.” The APE establishes the geographical area for the identification of historic properties, including both potential archaeological resources associated with direct ground disturbance, and architectural resources which may be subject to direct or indirect effects. Based on a combined scope of work for both the Viaduct and Community Grid Alternatives, the APE for the Project was established by the NYSDOT and the FHWA in consultation with the New York State Historic Preservation Office (SHPO) and documented on September 6, 2016 (see **Appendix C, Correspondence**).

Factors considered in the development of the APE for the Project include the existing topography and building heights within the project limits. As distance and obstructions increase, the potential for adverse effects to a resource’s setting due to visual and audible effects decreases. Therefore, the APE includes areas that would have the most proximate and unobstructed views to the project site and areas in which proposed project elements may alter the character or setting of historic properties.

Within the APE, a smaller area was defined representing potential direct effects from physical alterations or ground disturbance associated with the project. This area represents the combined limits of disturbance (LOD) of the Viaduct and Community Grid Alternatives and includes the area in which they have the potential to cause direct effects on historic properties. In the vertical dimension, the APE is defined by the depth of ground disturbance associated with proposed construction-related activities. In September 2016, this information was not yet available, pending more detailed design and engineering work for the Project.

Initially, the Project was divided into four areas including the I-81 Viaduct Study Area (now the Central Study Area), the largest portion of the project site in downtown Syracuse, and three outlying areas (the North, South, and East Study Areas) where interchange improvements would occur. The Central Study Area is generally a dense urban environment characterized by buildings of varying height, scale, use, and style; surface streets and parking lots; pedestrian areas, public spaces, and sidewalks; and, elevated interstate highway infrastructure (bridges and ramps). The topography of the Central Study Area ranges from relatively flat along the interstate corridors downtown to more varied topography moving outwards from the interstate corridors into surrounding neighborhoods.

The North, South, and East Study Areas are less densely developed with buildings typically one to three stories in height. These areas are primarily residential in character but also include commercial, light-industrial, and institutional uses. The topography of the three outlying study areas is flat to moderately hilly.

I-81 Central Study Area

Where the project would result in street improvements limited in scope to changes in traffic direction, re-striping of roadways, changing traffic signals, and similar, the APE was delineated to include only properties that are either partially within or immediately adjacent to the project site boundaries. Along I-81 from Division Street north, the APE includes properties that are partially within or immediately adjacent to the project site to account for potential effects associated with road and bridge improvements, which would be constructed in locations and at elevations similar to existing.

Along West Street from I-690 to the southern terminus of the project limits along West Street, improvements would mainly consist of the replacement of existing infrastructure at a lower height than existing. In order to account for potential effects on historic resources, the APE was drawn to include properties within or adjacent to the project limits as well as properties within approximately one block of the project limits. Where structures or other physical features do not intervene between the project site and properties within immediately adjacent blocks, those parcels were included in the APE.

Additionally, the APE was delineated to include properties located beyond one block from the project site where intervening structures are either non-existent or small enough in scale that adjacent properties possess a proximate and unobstructed relationship to the project site. Portions of the Central Study Area for which this delineation methodology has been used include the following:

- The area in the vicinity of I-81 between I-690 and Burt Street where the height of the proposed viaduct would be up to 15 feet higher than existing; and
- The area in the vicinity of the I-690 interchange with I-81 where the proposed I-690 viaduct would be up to 15 feet higher than existing. The construction of new connector ramps would result in ramps up to 40 feet higher than existing I-690.

Along I-690 between McBride Street and the eastern end of the project limits, the APE has been delineated to include between one half block and one block from the project site to include areas with direct and proximate views of the project site. The change in height of the proposed viaduct along the eastern portion of I-690 would be minimal.

Along I-81 south of Burt Street, the APE includes properties within and adjacent to the project site. Additional properties beyond these were included where direct and proximate views of the project site are afforded because no structures or other physical features intervene between the project site and adjacent properties. The change in height of the proposed I-81 viaduct along the southern portion of the project site would be minimal.

North, South, and East Study Areas

Three interchange areas that are not contiguous with the Central Study Area described above include the South Study Area (the I-481/I-81 interchange south of downtown Syracuse in the Outer Comstock area); the North Study Area (the I-481/I-81 interchange north of Syracuse in the Town of Cicero); and the East Study Area (the I-481/ I-90 interchange east of Syracuse in the Town of DeWitt). In the South and East Study Areas, road and ramp improvements would be at heights similar to existing. In the I-481 North Study Area, road and ramp improvements would result in infrastructure at heights up to 30 feet higher than existing. Because all of these interchange areas are located in less developed areas and the visibility of the interchange areas is generally limited in scope, the APE in these study areas includes only properties that are within or adjacent to the project limits.

Based on review of the provided information, the SHPO concurred with the APE for the Project as described above in a letter dated September 22, 2016 (see **Appendix C, Correspondence**).

As a result of subsequent changes to the project design since the NYSDOT's last formal consultation regarding the APE with SHPO on December 21, 2016, the APE was refined to incorporate anticipated direct and indirect effects in discrete locations, applying the same method used to define the initial APE. In the vicinity where minor street or sidewalk improvements such as sidewalk reconstruction were incorporated into the project design, the APE was amended to include all areas that may be subject to temporary or permanent direct impacts. These impacts include ground disturbance or staging as well as easements or minor acquisitions.

Additionally, noise walls were proposed as project elements for the purpose of abatement for noise impacts. In the vicinity of proposed noise walls, the LOD was modified to include the footprint of the proposed noise walls and a ten-foot buffer for anticipated staging and adjacent ground disturbance. Modifications made to the LOD to account for noise wall construction was limited to the NYSDOT right-of-way, (ROW) except in the limited locations where property easements or acquisitions would be required. In these limited cases, the LOD was modified to encompass areas on adjacent properties where temporary or permanent direct impacts could result from noise wall construction. The APE was amended to reflect modifications made to the LOD associated with the proposed noise walls and to include the entirety of any property that would be subject to temporary or permanent direct impacts, including easements or acquisitions, and potential indirect (visual) effects.

In the North Study Area, the APE was amended to include the entire ROW of the I-81/I-481 interchange east along I-481 to the western ramps of the County Route 82 interchange and north on I-81 to include land adjacent to the highway - one entire parcel and a portion of a second parcel – south of East Pine Grove Road. to include the potential for temporary or permanent direct impacts resulting from noise wall construction. In the East Study Area, the APE was amended to incorporate the existing ROW and minor widening to the south and additional areas on I-481 south of the junction of I-481 and I-690 to include the footprint of the proposed

noise walls and a ten-foot buffer for anticipated staging and adjacent ground disturbance. In the South Study Area, the APE was modified to include the footprint of the proposed noise walls and a ten-foot buffer for anticipated staging and adjacent ground disturbance along Rock Cut Road.

The project design underwent additional modifications subsequent to the release of the preliminary Draft Design Report/Draft EIS in April 2019, some of which were in response to public comments received on the document. To reflect these design modifications, the APE was refined in consideration of direct and indirect effects in discrete locations, applying the same methodology used to define the initial APE. In the Central Study Area, design changes included the addition of a northbound Business Loop (BL) 81 off-ramp to Colvin Street and a southbound BL 81 to northbound I-81 freeway ramp. Design modifications also included integration of a variety of safety improvements and pedestrian accommodation improvements along the Bear Street corridor. In addition, the previously proposed signalized intersection at BL 81/ Martin Luther King, Jr. East was replaced with a proposed roundabout to improve traffic calming characteristics. The APE was also amended to include the intersection of Oakwood Avenue and Martin Luther King, Jr. East.

In the North Study area, the APE was amended to include the footprint of a proposed noise wall north of Farrington Road and a 10-foot buffer for anticipated staging and adjacent ground disturbance.

The APE within the East Study Area was amended to include the existing I-481/Route 5 interchange (Interchange 3). Proposed improvements to Interchange 3 include operational and safety improvements to the southbound I-481 off-ramp to eastbound Route 5, the northbound I-481 on-ramp from westbound Route 5, and operational improvements at the adjacent intersection of Route 5 and Route 92 (Lyndon Corners). The APE was also amended to include the I-690/I-481 interchange (Interchange 4), contiguously linking the previously disconnected portions of the APE within the East Study Area.

The maps included in **Appendix A, Figures** show the current APE.

2. STEPS TAKEN TO IDENTIFY HISTORIC PROPERTIES

The Interstate highways within the Project's APE (I-81, I-690, I-481, and I-90) are subject to the *Section 106 Exemption Regarding Effects to the Interstate Highway System (2005)*, which removes the majority of the Nation's Interstate Highway System from consideration as a historic property under Section 106. A similar provision under the *Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users* (SAFETEA-LU, Public Law 109-59, Aug. 10, 2005), Section 6007, exempts the bulk of the Interstate Highway System from consideration as a historic resource under Section 4(f) of the Department of Transportation Act of 1966.

Excluded from these exemptions are designated elements of the Interstate System that are exceptional in some way or meet a national level of significance under the criteria for the National Register of Historic Places. Since there are no excluded elements of I-81, I-690, I-481 or I-90 within the Project's APE, these Interstate highways are not considered historic properties for the purpose of Section 106 and Section 4(f).

ARCHAEOLOGICAL RESOURCES

The NYSDOT and the FHWA conducted a field meeting with the SHPO on June 27, 2014 to initiate consultation regarding appropriate steps for the identification of historic properties. Given the size of the

project area and existing conditions within an urban environment, a phased process is being used for the identification and evaluation of archaeological properties, establishing "... the likely presence of historic properties within the area of potential effects for each alternative or inaccessible area through background research, consultation and an appropriate level of field investigation..." (36 CFR §800.4(b)(2)). Following the guidelines of the New York SHPO *Phase I Archaeological Report Format Requirements* (2005)¹, a Phase IA investigation was deemed appropriate as the initial phase of investigation for this project due to the urban setting and extent of prior ground disturbance within the project area. The goals of a Phase IA investigation, as stated in the SHPO guidelines, are to "inform subsequent testing strategies and to provide the contextual framework within which to interpret identified historic properties" (page 1).

Phase IA Sensitivity Assessment

The *Phase IA Archaeological Sensitivity Assessment: I-81 Viaduct Project* (September, 2016)² (the "Phase IA Report, 2016"), completed in September 2016, was prepared by archaeologists meeting the National Park Service (NPS) Professional Qualification Standards for Archaeology (36 CFR Part 61) following established standards, including the New York Archaeological Council's (NYAC) *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York* (NYAC 1994)³ and the New York State Education Department (NYSED) *Cultural Resources Survey Program Work Scope Specifications for Cultural Resources Investigations on New York State Department of Transportation Projects* (NYSED Work Scope, 2004). The organization of the report is consistent with the SHPO report format requirements.

The Phase IA Report, 2016 gathered background data and historical information to assess the likelihood that archaeological resources are located in the APE. The report includes detailed historic context narratives for the period of Pre-Contact Native American settlement and occupation of the land comprised of the APE and vicinity, as well as descriptions of the settlement and development of the land during the Historic Period. This site-specific historic context provides a foundation for the identification and evaluation of potential archaeological resources in accordance with the requirements of Section 106.

Background research and information on known archaeological sites within or adjacent to the APE indicate varying levels of archaeological sensitivity for Pre-Contact Native American sites, ranging from small camps and scatters of artifacts to village sites. There is also a potential for the presence of Pre-Contact burial sites. Potential archaeological resources representing the Historic Period include artifact scatters, structural remains including building foundation and features such as privies and wells, and canal-related features.

¹ <https://parks.ny.gov/documents/shpo/environmental-review/PhaseIReportStandards.pdf>

² *Phase 1A Archaeological Sensitivity Assessment: I-81 Viaduct Project* (NYSDOT PIN 3501.60). Report prepared for the New York State Department of Transportation and the U.S. Department of Transportation, Federal Highway Administration by Environmental Design and Research Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR), Syracuse, NY, 2016.

³ <https://nysarchaeology.org/wp-content/uploads/2013/12/NYACStandards.pdf>⁴ *Phase IB Archaeological Survey Work Plan, I-81 Viaduct Project: Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery*. City of Syracuse and Towns of Salina, Cicero, and DeWitt, Onondaga County. Prepared for the New York State Department of Transportation and the Federal Highway Administration by Environmental Design & Research, Syracuse NY.

The Project is located primarily within a highly developed urban area with a complicated history of prior ground disturbance that affects the integrity of potential archaeological deposits. The Phase IA Report, 2016 documents prior ground disturbance within the APE, based on mapped soils, buried utilities, and demolished structures; GIS analysis of soil borings to estimate depth of fill and disturbed soils within the APE; and identification of highway cut and fill embankment areas. Moderate to severe disturbance is documented for approximately 67.7% of soils within the APE for direct effects. The total area of undisturbed soils, or areas where disturbance cannot be documented, is approximately 19 acres.

The report concludes that the potential for archaeological sites to be present within the APE is highly variable, requiring differing methods of investigation depending on existing conditions, the anticipated depth of proposed impacts, and extent of prior ground disturbance at different locations. The report recommended a review of Project design information to identify the extent of proposed construction-related disturbance within archaeologically sensitive areas, to serve as the basis for developing a Phase IB Archaeological Survey Work Plan.

In coordination with the FHWA, the NYSDOT submitted the Phase IA Report, 2016 to the SHPO for review, requesting comments on the results of the sensitivity assessment and preliminary recommendations for archaeological investigations. Based on review of the provided information, the SHPO concurred with the Phase IA Report, 2016 recommendations, and with continuing consultation for the development of a Phase IB archaeology work scope, once the vertical APE had been clarified (**Appendix C, Correspondence:** September 22, 2016).

The Phase IA Report, 2016 was also provided to the Onondaga Nation due to the project location within the geographical area of interest identified by the Nation for Section 106 consultation. The Onondaga Nation responded to the NYSDOT on November 14, 2016, and provided additional comments to the FHWA on March 1, 2017. The Nation requested additional information on the vertical APE, known archaeological sites, and a more detailed discussion of procedures for consultation in the event that human remains are encountered. The Onondaga Nation also stated a preference to avoid disturbing any human remains.

In response to requests for additional information, the NYSDOT provided archaeological site inventory forms and mapping, updated information on the estimated depth of soil disturbance, and clarification regarding the development of a plan for Phase IB archaeological investigations. The NYSDOT noted that the Onondaga Nation's questions and concerns were being considered in the development of a Phase IB Archaeological Survey Work Plan. Regarding the potential discovery of human remains, a Phase IB Archaeological Survey Work Plan would include a sampling strategy prioritizing areas where there is a potential for human remains to be present, and protocols established by the SHPO, the NYSDOT, and the Haudenosaunee for consultation when human remains are discovered (**Appendix C, Correspondence:** May 19, 2017).

Phase IB Archaeological Investigations

Based on the information and analysis documented in the Phase IA Report, 2016, archaeologists prepared a *Phase IB Archaeological Survey Work Plan*⁴ (October 2017) (the "Phase IB Work Plan, 2017"), describing

⁴ *Phase IB Archaeological Survey Work Plan, I-81 Viaduct Project: Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery.* City of Syracuse and Towns of Salina, Cicero, and DeWitt, Onondaga

various methods for subsurface testing to determine the presence or absence of archaeological sites within the portion of the APE for direct effects. The Phase IB Work Plan, 2017 was developed to investigate soils to the anticipated depth of disturbance, or vertical APE, in various locations as indicated by preliminary design information for the Viaduct and Community Grid Alternatives.

As outlined in the Phase IB Work Plan, 2017, the following areas within the APE for Direct Effects were eliminated from Phase IB field investigations, and from further consideration relative to archaeological resources:

- Cut-and-Fill Highway and Embankment areas in which substantial cutting and filling of sediment has occurred related to highway reconstruction. These areas have been determined to be severely disturbed to such an extent that there is no potential for intact archaeological resources to be present.
- Paved and/or previously disturbed areas where the proposed depth of construction is anticipated to be relatively minimal, within 2 feet (61 centimeters) of the existing ground surface. This would include areas where construction activities are limited to road re-surfacing or minor widening, curb replacements, streetscape improvements, and similar small-scale activities.

For remaining locations within the APE, the Phase IB Work Plan, 2017 describes three methods for archaeological investigations in identified areas of sensitivity: shovel testing, machine-aided excavation, and archaeological monitoring during construction.

- Shovel testing – in unpaved areas where no previous disturbance is documented or anticipated, and where the depth of fill deposits is unlikely to exceed the practical limits of hand excavation
- Mechanized excavation – in previously disturbed areas where the proposed depth of construction activities is anticipated to be greater than 2 feet below existing grade, due to the potential for intact archaeological deposits to exist under a layer of disturbed fill
- Archaeological monitoring during construction – restricted to existing public roadways where there is a potential for significant archaeological resources, and the removal of pavement in advance of construction is not feasible

In addition to methodology, the Phase IB Work Plan, 2017 outlines procedures and protocols for consultation among the SHPO, the Onondaga Nation, the FHWA and the NYSDOT to identify and evaluate archaeological resources, determine the need for additional investigations (Phase II Site Examination), and consider measures to avoid, minimize, or mitigate any adverse effects on identified archaeological sites.

On June 7, 2017, the draft Phase IB Work Plan was provided to the SHPO, the Onondaga Nation, and the FHWA for consideration at a June 13, 2017 consultation meeting to discuss the proposed methods and procedures for Phase IB archaeological investigations. The SHPO provided written comments to the NYSDOT

in letter dated July 19, 2017, requesting three minor revisions to the draft Phase IB Work Plan. Comments from the Onondaga Nation, provided by e-mail on July 23, 2017, included a request to be present for shovel and mechanical testing, and to observe and participate in archeological monitoring during construction. The Nation also requested revisions to include additional references to procedures regarding the potential discovery of human remains.

Following revisions requested by the SHPO and the Onondaga Nation, the NYSDOT finalized and distributed the Phase IB Work Plan, 2017 to the SHPO, the Onondaga Nation, and the FHWA on October 10, 2017. The SHPO responded by letter dated November 3, 2017, confirming that all comments provided in the July 19, 2017 letter have been addressed, and that the SHPO had no further concerns with the document (**Appendix C: Correspondence**).

The NYSDOT extended an invitation for a representative of the Onondaga Nation to be present during the first phase of archaeological fieldwork and notified the Nation that shovel testing was expected to begin in mid-November 2017. Representatives were provided the meeting location and start time in advance; however, archaeological field survey proceeded without the participation of the Onondaga Nation representatives.

Phase IB archaeological survey was initiated with surface reconnaissance and shovel testing in areas previously designated in the Phase IB Work Plan, 2017. Areas recommended for shovel testing in the Phase IB Work Plan, 2017 were first subjected to a walkover surface reconnaissance survey consisting of archaeologists walking along transects spaced at 3- to 5-meter intervals while inspecting the ground surface for obvious evidence of disturbance, artifacts, and/or archaeological features.

Based on the walkover surface reconnaissance survey, some areas initially recommended for shovel testing in the Phase IB Work Plan, 2017 were determined to have been substantially cut and/or filled to the extent that there was no potential for intact archaeological deposits to be present in these areas. Though not identified as cut and fill areas in the Phase IA Report, 2016 or Phase IB Work Plan, 2017, these areas were determined to be extensively disturbed due to visible surface indications (e.g., regular/engineered landforms, indications of grading, abrupt changes in topography or elevation relative to adjacent areas) during the Phase IB fieldwork. These locations were photographed and described in field notes and occasionally a small number of shovel tests were excavated on a judgmental basis to confirm the presence of disturbed soils. These areas were not subjected to systematic shovel testing.

Shovel tests were excavated in unpaved areas where extensive previous disturbance was not documented or anticipated and where the depth of fill deposits, if present, was unlikely to exceed the practical limits of hand excavation. Shovel tests were excavated at 50-foot (approximately 15-meter) intervals. Each shovel test measured approximately 12-20 inches (30-50 cm) in diameter and was excavated to a depth of at least 4 inches (10 cm) into the subsoil stratum or to the limits of practical hand excavation. The locations of all shovel tests were recorded with professional-grade GPS equipment and noted on field maps. Stratigraphic profiles, including depth, soil color, and texture, for all shovel tests were recorded on standardized field record sheets.

Based on the results of the shovel testing, archaeologists prepared a *Phase IB Archaeological Survey: Shovel Testing* (September 2020) (the “Phase IB Survey, 2020”). The draft Phase IB Survey was provided to the SHPO on July 23, 2019 (**Appendix C, Correspondence**). The SHPO responded in an e-mail dated July 25, 2019 that the SHPO had no concerns or comments regarding the report. The NYSDOT provided the draft Phase IB Survey to the Onondaga Nation and the Tuscarora Nation on August 2, 2019 (**Appendix C, Correspondence**). In the same transmittal letter, the NYSDOT provided the Tuscarora Nation with the Phase IA Report, 2016 and the Phase IB Work Plan, 2017, since both reports were completed prior to September 13, 2018, when the FHWA initiated consultation with the Tuscarora Nation (**Appendix C, Correspondence**). The Onondaga Nation provided written comments to the FHWA and NYSDOT in an e-mail dated September 4, 2019, requesting clarification about the testing and results at a few discrete shovel test pits. The NYSDOT corresponded with FHWA on October 25, 2019 (**Appendix C, Correspondence**) with a request to forward to the Onondaga Nation a response clarifying the testing and results at the discrete shovel test pits, along with a revised shovel test pit record (Appendix IV of the draft Phase IB Survey).

Subsequent to the completion of the draft Phase IB Survey, the Project’s APE for Direct Effects was revised in several locations. Additions to the APE for Direct Effects were evaluated on a case-by-case basis using the established methodology presented in the Phase IB Work Plan, 2017. Based on these evaluations, additional Phase IB archaeological surface reconnaissance and shovel testing was recommended for two areas.

Phase IB shovel testing was completed on September 3, 2020 and no National Register eligible sites have been identified to date. The Phase IB Archaeological Survey report, 2020 was finalized and provided to the SHPO, the Onondaga Nation, and the Tuscarora Nation for review on September 25, 2020.

Based upon review of the Phase IB Archaeological Survey report, 2020, the SHPO provided comments in a letter dated October 16, 2020, stating that the SHPO had no concerns or comments regarding the report. The SHPO concurred that no additional Phase IB shovel testing is warranted and that the Britton Lime Works Historic Site and the Crouse Road Historic Site are not National Register eligible.

The Onondaga Nation provided comments in a letter dated November 4, 2020, recommending additional shovel testing in areas associated with previously disturbed soils and areas that include fill material as identified in the Phase IB Work Plan. In a letter dated December 18, 2020, the NYSDOT in coordination with the FHWA recognized the Onondaga Nation’s concerns regarding the potential presence of cultural artifacts and human remains in previously disturbed areas. The NYSDOT also explained that the approach to eliminate these areas from Phase IB shovel testing is consistent with established standards for archaeological surveys. For National Register eligibility, archaeological sites must possess integrity, which generally means that sites must be intact and in their original location. Due to a loss of integrity, areas associated with fill materials or documented disturbance are generally not subject to archaeological testing. Based on accepted archaeological standards, SHPO concurrence that no additional shovel testing is warranted, and in coordination with the FHWA, the letter informed the Onondaga Nation that the NYSDOT does not support further preconstruction shovel testing in areas of previous ground disturbance.

The phased process for the identification of archaeological resources will be completed as the Project progresses through construction, through implementation of the approved Phase IB Work Plan, 2017 and continuing consultation with the SHPO, the Onondaga Nation and the Tuscarora Nation to evaluate

archaeological resources located within the APE for Direct Effects. If archaeological resources are identified as a result of Phase IB machine-aided testing or monitoring during construction, the NYSDOT in coordination with the FHWA, and in consultation with the SHPO, will consider options for avoidance. The Onondaga Nation and the Tuscarora Nation will be invited to consult on Native American sites. If the site(s) cannot be avoided, Phase II investigations may be needed to obtain sufficient information to evaluate eligibility by applying the National Register Criteria for Evaluation. Following procedures outlined in the Phase IB Work Plan, 2017, the NYSDOT and the FHWA in coordination with the NYSDOT will consult with the SHPO, the Onondaga Nation, and the Tuscarora Nation to consider measures to minimize or mitigate potential adverse effects on any National Register eligible archaeological properties identified through this process, including any archaeological sites discovered during construction.

ARCHITECTURAL RESOURCES

Information on properties previously evaluated for National Register eligibility was collected from the online SHPO Cultural Resource Information System (CRIS) database. Properties that were previously determined Eligible, Not Eligible, or listed in the National Register were compiled, tabulated, and mapped.

Following the inventory of previous evaluated properties, architectural historians meeting the NPS Professional Qualification Standards for Architectural History (36 CFR Part 61) conducted field surveys within the APE to inventory and evaluate previously unevaluated properties over 50 years in age. Information collected during the field survey was supplemented by research at various repositories in Syracuse, and consultation with local historical societies, local libraries, municipal historians, and historic preservation organizations to gather data on historic resources in the APE. Properties currently designated as City of Syracuse Landmarks and properties determined eligible for such listing were inventoried for reference only.

Architectural properties were evaluated for eligibility by applying the *National Register Criteria for Evaluation* (36 CFR Part 60.4). Districts, sites, buildings, structures, and objects are eligible for the National Register if they possess integrity of location, design, setting, materials, workmanship, feeling, and association, and meet the following Criteria:

- Criteria A: Are associated with historic events;
- Criteria B: Are associated with significant people;
- Criteria C: Embody distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic value, or are otherwise distinguished; or
- Criteria D: May yield information important in prehistory or history.

The results were documented in the *I-81 Viaduct Project Architectural Resources Survey: I-81 Viaduct Project* (September 2016) prepared in accordance with the NYSED Work Scope standards. Based on a review of this report, the SHPO provided comments in a letter dated September 22, 2016, along with a full list of inventoried properties and the SHPO assessment of building eligibilities. As part of the continuing consultation with the SHPO, the NYSDOT provided supplemental information in November and December 2016 to clarify the list of historic architectural properties within the APE, resulting in a total of 695 inventoried buildings and structures, including 3 historic districts and 82 individual National Register listed or eligible architectural properties. (**Attachment E, "Correspondence"**).

Since the last formal consultation with SHPO on December 21, 2016 regarding the evaluation of architectural properties within the APE, additional properties were considered and evaluated based on APE amendments resulting from design modifications. The *I-81 Viaduct Project Architectural Resources Survey Addendum* (September 2020) (the “Architectural Resources Survey Addendum 2020”) compiled the updated information. In addition to the evaluation of properties based on amendments to the APE, other updates to the properties within the APE are based on changes not related to the project. Several buildings have been demolished, updates have been made to the National Register status of historic districts, and other corrections to previous information were identified.

On October 1, 2020, the NYSDOT submitted the report entitled *Architectural Resources Survey Addendum: I-81 Viaduct Project* to the SHPO and FHWA for review. Based upon review of the report, the SHPO concurred with the eligibility recommendations for the additional properties identified in the *Architectural Resources Survey Addendum*. Based on review of the report and subsequent telephone discussion with the NYSDOT, the FHWA provided a determination by letter dated November 7, 2020 that the *Architectural Resources Survey Addendum* satisfactorily meets the requirements of 36 CFR 800.4 (a-c) regarding the identification and evaluation of historic architectural properties. The FHWA concurred that the identification of historic architectural properties within the APE as documented in the *Architectural Resources Survey Addendum* is complete, based on the understanding that the phased approach for the identification and evaluation of historic properties is limited to archaeological resources.

3. EVALUATION OF PROJECT IMPACT ON IDENTIFIED HISTORIC PROPERTIES

ARCHAEOLOGICAL RESOURCES

In accordance with 36 CFR 800.5(a)(3), the FHWA in coordination with NYSDOT is using a phased process to apply the criteria of adverse effect to archaeological resources, consistent with the phased identification and evaluation efforts described in the Phase IB Work Plan, 2017.

Archaeological studies conducted to date have established the likely presence of archaeological resources within the APE, and identified areas of sensitivity in association with Pre-Contact Native American and historic contexts. The initial phase of Phase IB field investigations, consisting of hand-excavated shovel tests, has been completed, and no National Register eligible sites have been identified. Archaeological sites identified through machine-aided archaeological testing and archaeological monitoring during construction will be subject to consultation among the SHPO, the FHWA, the Onondaga Nation and the NYSDOT, as outlined in the Phase IB Work Plan, 2017, to evaluate National Register eligibility and consider measures to avoid, minimize, or mitigate any adverse effects.

ARCHITECTURAL RESOURCES

Four historic districts, with 97 contributing resources, and 98 individually NR-listed or eligible properties, both outside the district and within the district where they have been identified as both contributing resources and individually eligible, have been identified within the APE. The identified historic properties represent the current count of all historic properties. The locations of identified historic properties are shown in Figures 2a

through 2h in **Appendix A, Figures**. Photographs of affected properties under the Viaduct Alternative are provided in **Appendix D Photographs and Visualizations**.

Measures to Avoid or Minimize Effects on Historic Properties

The NYSDOT, in coordination with the FHWA, has examined options to avoid and minimize adverse effects to historic properties throughout the development of the project. These options include design changes and refinements to roadway alignments, taking into consideration the applicable design requirements and standards approved by the FHWA. As such, current designs for both alternatives reflect an effort to meet the established design criteria while minimizing impacts to historic properties.

Under both the Viaduct and Community Grid Alternatives, alignment curves were tightened and non-standard highway features were justified within allowable parameters, given speed requirements, to reduce the roadway right-of-way impact. In addition, efforts were made to further reduce impacts to historic properties by shifting the alternatives' alignments (i.e., moving it further east or west or further north or south); however, given the proximity of the proposed right-of-way to historic resources, shifting the alignments would not fully avoid impacts to historic resources under the Viaduct Alternative.

For each of these alternatives, the Viaduct and Community Grid, the option with the alignment that caused the fewest impacts to historic resources was carried forward for further study in the Draft EIS, and the other options were dismissed from further consideration.

A critical factor in continuing efforts to avoid or minimize effects on historic properties is represented by design standards adopted by the FHWA that apply to highway construction and reconstruction projects on the Interstate System. As stated in the American Association of State Highway and Transportation Officials' (AASHTO) publication entitled *A Policy on Design Standards Interstate System* (January 2005), "Interchanges shall be provided between all intersecting interstate routes, between other selected access-controlled highways, and at other selected public highways to facilitate the distribution of traffic. Each interchange shall provide for all traffic movements." Per the FHWA, the Viaduct Alternative must provide new interchange connections at I-690 and I-81 where these connections do not currently exist, for consistency with the design standards.

Under the Community Grid Alternative, these design standards do not apply, since the existing intersection of two Interstate highways, I-690 and I-81, would be replaced by the intersection of I-690 with Business Loop (BL) 81. Previously, an option to build two new ramps providing direct connections between eastbound I-690 and northbound I-81, and between southbound I-81 and westbound I-690, was considered. This option would have required the acquisition and demolition of two historic properties, the Learbury Centre (329 North Salina Street), a contributing resource in the National Register listed North Salina Street Historic District, and the Veteran's Fastener Supply Corporation (117 Butternut Street), a National Register eligible property. With the designation of BL 81, the new interchange connections could be eliminated, and other alignment revisions became feasible, thereby avoiding the need for the acquisition and removal of any historic buildings or structures under the Community Grid Alternative.

Based on a balanced consideration of the need for safe and efficient transportation; the social, economic, and environmental effects of the project alternatives; and national, state, and local environmental protection

goals, the Community Grid Alternative has been identified as the Project's preferred alternative, as indicated in the Draft EIS.

Direct Effects

As described in the "Description of Build Alternatives" (pages 1-2 of this document), major elements of the Viaduct Alternative and the Community Grid Alternative, including interchange modifications, bridge replacements, and other features would cause direct, physical impacts to historic architectural properties.

Prior to design modifications, the Community Grid Alternative would have required the acquisition and demolition of two historic properties, the Learbury Centre (329 North Salina Street) and the Veteran's Supply Fastener Corporation (117 Butternut Street). As a result of recent design modifications to the Community Grid Alternative, the proposed demolition of historic buildings has been avoided.

The partial acquisition of land from twelve (12) historic properties would be required for construction of the Community Grid Alternative, but no historic buildings or structures would be removed or demolished.

Based on the current design of the Viaduct Alternative, eleven (11) buildings eligible for or listed in the National Register (NR) would be acquired and demolished, two of which are contributing resources in the National Register listed North Salina Street Historic District Expansion. Four (4) individually NR-listed or eligible properties would be subject to the partial acquisition of land with no physical impacts to the existing buildings or structures.

Table 1 summarizes changes to identified historic properties within the APE under the Viaduct Alternative and the Community Grid Alternative, reflecting recent design modifications.

TABLE 1: Proposed Changes under Build Alternatives – Direct Effects

Map Key	Property Name / Address	Viaduct Alternative	Community Grid Alternative
HD-2	North Salina Street Historic District (HD-2) NR Listed Boundary Expansion – 1999 & 2016 / NR Eligible 317-327 North Salina Street Britton Block 329 North Salina Street Learbury Centre	Proposed removal / demolition of two contributing resources (Britton Block and Learbury Centre), due to the improvement of the existing Pearl Street on-ramp to meet design standards. This short, non-standard ramp would be converted to a two-lane ramp to address capacity needs and meet design standards for acceleration lane length. The removal of these buildings would be required for the construction of the westbound I-690 to northbound I-81 connector ramp, and the eastbound I-690 to northbound I-81 ramp. The deep horizontal and ramp spacing criteria necessitate the alignment, which involves providing wider shoulders than exist today. In addition, a 0.3-acre vacant parcel at 514 Oswego Boulevard, within the district, would be acquired for the alignment of the eastbound I-690 to northbound I-81 ramp.	Minor strip taking from property at 329 North Salina Street, the Learbury Centre. No impact to the building. Ramp construction and grading for the ramp from westbound I-690 to BL-81. The deep horizontal and ramp spacing criteria necessitate this alignment, which involves wider shoulders than exist today.
#11	NY Central Railroad Passenger & Freight Station NR Listed 815 Erie Boulevard, 400 Burnet Avenue and 711-21 Erie Boulevard	Proposed removal of the freight station (400 Burnet Avenue), a contributing resource, and physical impacts to the upper portions of the existing freight tunnels to meet requirements pertaining to number of lanes and shoulder width for the westbound I-690 exit ramp to Catherine Street (replacing the existing Townsend ramp), and the reconstruction of the westbound I-690 to southbound I-81 ramp (to provide standard shoulder width). The passenger station (815 Erie Boulevard) would not be directly impacted.	Minor acquisitions from the NY Central Railroad complex, consisting of a portion of a parking lot on the east side of the passenger station (815 Erie Boulevard), for new eastbound off-ramp to Irving Avenue. Small wedge of property on the southeast side of the freight station (400 Burnet Avenue) for new westbound on-ramp from Crouse and Irving Avenues. In addition, the property would be subject to temporary construction easements for new on- and off-ramps. No physical impacts to buildings.

Map Key	Property Name / Address	Viaduct Alternative	Community Grid Alternative
#15	Veteran's Fastener Supply Corp. 117 Butternut Street NR Eligible	Proposed building removal due to Pearl Street on-ramp; westbound I-690 to southbound I-81 connection, and the eastbound I-690 to northbound I-81. Additionally, the realignment of Butternut Street overpass, required to allow the lowering of the eastbound I-690 to northbound I-81 ramp, which passes beneath the overpass, and to allow southbound I-81 to westbound I-690 ramp to be moved farther away from the Franklin Square neighborhood.	Minor acquisition would be required for the realignment of Butternut Street overpass, necessary to provide adequate vertical clearance over former I-81 which passes beneath the overpass.
#24	Smith Restaurant Supply 500 Erie Boulevard E NR Eligible	Proposed building removal due to proposed physical impacts at southwest corner by southbound I-81 viaduct. Placement of viaduct is dictated by horizontal geometry to meet the geometric design criterion for curve radius; need to eliminate nonstandard shoulder width.	No change
#30	Reid Hall 610 East Fayette Street NR Eligible	Proposed building removal of Reid Hall due to widening the southbound I-81 exit to Harrison Street, the westbound I-690 to southbound I-81 ramp, and the northbound I-81 and eastbound I-690 viaduct. The westward curve of the alignment, which dictates placement of this infrastructure, is necessary to meet horizontal geometric requirements.	No property acquisition. There would be a temporary construction easement of a strips along the edge of the property for sidewalk reconstruction and viaduct demolition. There would be no impacts to the resource.
#36	Peck Hall 309 South McBride Street NR Eligible	Proposed building removal of Peck Hall due to widening the southbound I-81 exit to Harrison Street, the westbound I-690 to southbound I-81 ramp, and the northbound I-81 and eastbound I-690 viaduct. The westward curve of the alignment, which dictates placement of this infrastructure, is necessary to meet horizontal geometric requirements.	No property acquisition. There would be a temporary construction easement of a strips along the edge of the property for sidewalk reconstruction and viaduct demolition. There would be no impacts to the resource.

Map Key	Property Name / Address	Viaduct Alternative	Community Grid Alternative
#45	Syracuse Herald Building 212 Herald Place NR Eligible	Proposed building removal due to two ramps: eastbound I-690 to southbound I-81 and eastbound I-690 to northbound I-81.	Minor acquisition for the new entrance ramp from West Street to eastbound I-690. A temporary easement is also required.
#52	VIP Structures 471-81 Oswego Boulevard / 1 Webster's Landing - NR Eligible	Proposed building removal. The southbound I-81 viaduct and westbound I-690 exit to West Street pass directly through this building.	Minor acquisition for the southbound Business Loop I-81 to eastbound I-690 ramp. A permanent easement of is also required.
#72	Wag Foods 909 North State Street NR Eligible	Proposed building removal due to alignment of the new connecting ramp from eastbound I-690 to northbound I-81, which is provided to meet interstate-to-interstate connectivity needs.	No change
#88	Howard & Jennings Pump Factory 123-129 Willow Street East	Proposed building removal. The southbound I-81 viaduct, as well as eastbound I-690 to southbound I-81 ramp and southbound I-81 to eastbound I-690 ramp, would pass through the location of this building.	Minor acquisition of land, due to the southbound BL-81 to eastbound I-690 ramp, would consist of a triangular taking along the north edge of the parcel in an area used as a parking lot. In addition, temporary construction easements of a small strip along Willow Street, would be required for sidewalk reconstruction and driveway relocation. There would be no physical impacts to the building.
#4	Michael Dolphin / Barboni Building NR Eligible 112-16 Burnet Avenue	N/A. Changes to this property avoided through design modifications. No right-of-way acquisition.	N/A. Changes to this property avoided through design modifications. No right-of-way acquisition.
#23	Oak Knitting Co. Mill 102 Division Street West & Clinton Street NR Listed	N/A. Changes to this property avoided through design refinements. All work to be completed within the existing highway right-of-way.	N/A. Changes to this property avoided through design refinements. All work to be completed within the existing highway right-of-way.
#26	Niagara Hudson Building 300-20 Erie Boulevard West NR Listed	N/A. Changes to this property avoided through design modifications. No right-of-way acquisition.	N/A. Changes to this property avoided through design modifications. No right-of-way acquisition.

Map Key	Property Name / Address	Viaduct Alternative	Community Grid Alternative
#33	C.C. Bradley Plant 432 Franklin Street North to Clinton Street NR Eligible (Individual Property and contributing resource to the Franklin Square Historic District)	Minor strip taking along the northern edge of the property where there is currently greenspace and a parking lot, due to the realignment of Butternut Street and a section of Genant Drive. In addition, there would be a temporary construction easement to construct retaining walls and driveway modifications. There would be no physical impacts to the building.	Minor strip taking along the eastern edge of the parcel, in an area which is currently greenspace and a parking lot, due to the construction of the North Clinton Street extension to Butternut Street. There would be no physical impact to the building.
#34	Syracuse Lighting Co. Plant 311 Genant Drive to Clinton Street North NR Listed (Individual Property and contributing resource to the Franklin Square Historic District)	Minor strip taking along the northeast and south edges of the parcel, currently greenspace and a parking lot. In addition, there would be a temporary easement in the same areas to allow reconstruction of a portion of Genant Drive and the addition of a continuous sidewalk. No physical impacts to the buildings.	Minor acquisition consisting of a small wedge in the northeast corner of the property to provide for sidewalk reconstruction. In addition, there would be temporary easements in the northeast and west edges of the parcel for sidewalk and retaining wall construction. These areas are currently greenspace and a parking lot. No physical impact to the buildings.
#40	Engine Company 12 400 Genesee Street West & Wallace Street NR Eligible	Changes to this property avoided through design modifications. Permanent work to remain within the existing highway right-of-way.	Changes to this property avoided through design modifications. Permanent work to remain within the existing highway right-of-way.
#25	Terminal Building Warehouse (U Haul Warehouse) 740 Erie Boulevard East to Water Street East NR Eligible	No change. No acquisition or easements.	Changes to this property avoided through design modifications. Permanent work to remain within the existing highway right-of-way. Sidewalk reconstruction work would be done under a temporary easement.
#64	Saint John the Evangelist Church 215 N State Street NR Eligible	No change. No acquisition or easements.	Minor strip taking for sidewalk work.
#86	Weighlock Building 301 East Water St NR-listed (Individual Property and Contributing Resource - Hanover Square Historic District Expansion)	No change. No acquisition or easements.	No change. No acquisition or easements.

Map Key	Property Name / Address	Viaduct Alternative	Community Grid Alternative
#31	Remington (Monarch) Typewriter Company Building 429 N Franklin Street (Individual Property and contributing resource to the Franklin Square Historic District)	Partial (fee) acquisition and a temporary easement needed to replace an existing non-ADA compliant connection between N. Franklin Street and the Creekwalk with a shared-use path that meets ADA accessibility standards.	Partial (fee) acquisition and a temporary easement of 0.01 acres needed to replace an existing non-ADA compliant connection between N. Franklin Street and the Creekwalk with a shared-use path that meets ADA accessibility standards.
#29	312 Fillmore Avenue The Heritage at Loretto	No change	Partial acquisition is required for the new southbound entrance ramp.
#94	Former Easy Washing Machine Co. 800 CLINTON ST N. (currently Destiny Arms)	Minor acquisition consisting of a narrow taking along the south edge of the parcel in an area that is now the perimeter of a parking lot. In addition, there would be a temporary construction easement located on a narrow strip along the west edge of the property for sidewalk reconstruction.	Minor acquisition consisting of a narrow taking along the south edge of the property in an area that is now the perimeter of a parking lot. In addition, there would be a temporary construction easement located on a narrow strip along the west edge of the property for sidewalk reconstruction.

Indirect Effects

The assessment of indirect effects, beneficial or adverse, includes a consideration of the introduction of visual or audible elements that may alter the character of historic properties, compared to existing conditions. Table 1 in **Appendix B, Proposed Changes to Historic Properties in the APE** summarizes changes to all identified architectural properties within the APE, including properties subject only to indirect effects.

Visual Elements

Under the **Viaduct Alternative**, the proposed demolition of the existing I-81 and reconstruction of a new viaduct would change the height and profile of elevated sections of the Interstate highway in the Downtown area and surrounding neighborhoods. On eastbound I-690, the difference in height between the existing viaduct and reconstructed viaduct would range from 9 feet at Townsend Street, to 35 feet at Salina Street. In

the area of Townsend Street, the setting of historic properties facing Burnet Avenue, with I-690 to the rear of these properties, would not be altered by the minor change in the highway's elevation.

Approximately 650 feet east of Salina Street, the existing I-81/ I-690 interchange is situated adjacent to the rear of the property of Saint John the Evangelist Church (215 State Street North and Willow Street East, Map ID 64). The reconstructed highway would cause no visual effects to the primary elevation of the building, and would not alter character-defining features of its setting, compared to existing conditions. In the vicinity of I-690 and Salina Street, the Howard & Jennings Pump Factory (123-29 Willow Street East, Map ID 88) would be removed under the Viaduct Alternative.

At the highest point of the I-81/I-690 interchange, between North Franklin Street and Clinton Street where it would cross over the reconstructed I-690, the new eastbound I-690 to northbound I-81 ramp would be approximately 44 feet higher than the existing westbound I-690 over Clinton Street. Nearby historic properties include the VIP Structures building (471-81 Oswego Boulevard, Map ID 52) and the Syracuse Herald Building (212 Herald Place and Franklin Street North, Map ID 45). Despite the increase in height, the reconstructed interchange would not alter the character of the property's setting, compared to existing conditions.

Depending on the location, the Viaduct Alternative would increase the highway infrastructure, compared to existing conditions, by adding new ramps, lanes or a wider footprint compared to the existing I-81 Viaduct. The Viaduct Alternative would construct new ramps to provide direct connections, which are unavailable today, between eastbound I-690 and northbound I-81 and between southbound I-81 and westbound I-690. In other locations, proposed interchange consolidation would replace the existing interchange. For example, the I-81 Interchanges 19 (Clinton Street/Salina Street) and 20 (Franklin Street/West Street) would be combined into one partial interchange by replacing the existing off-ramps with a single ramp that would serve Clinton Street, and the existing on-ramps with a single, two-lane ramp at Pearl Street.

South of the Downtown area, the changes in elevation would be minimal, gradually increasing from north to south. In the section from Burt Street to Fayette Street, the reconstructed viaduct would range from 2 feet above the elevation of the existing viaduct at the railroad, to 12 feet above existing just south of Adams Street. In the vicinity of Madison Street, the increase would be approximately 13.5 feet. There are no historic properties immediately adjacent to the viaduct in this area. The closest historic properties are located approximately 250 to 500 feet to the east, on Harrison and Genesee Streets: 713-15 Genesee Street East (Map ID 37), 728 Genesee Street East (Map ID 38) and the Washington Irving School (725 Harrison Street). Due to the distance, building orientation, and intervening properties, the minor change in height of the elevated roadway would cause no changes in the viewshed of these historic properties.

Overall, given the character of the existing built environment, in which the elevated I-81 highway is a prominent feature, visual changes associated with elements of the proposed Viaduct Alternative would not alter the features that qualify surrounding historic properties for the National Register of Historic Places.

The **Community Grid Alternative** would involve demolition of the existing viaduct between the New York, Susquehanna & Western Railway bridge and the I-81/I-690 interchange. On I-690 in the vicinity of Salina Street, the reconstructed highway would be approximately 20 feet higher than the existing eastbound I-690 bridge. The closest historic property, VIP Structures (471-81 Oswego Boulevard, Map #52), is roughly 300 feet to the northwest, surrounded by the existing elevated highway, ramps and bridges.

The Community Grid offers additional benefits by improving connectivity, substantially reducing the highway footprint, and re-establishing a portion of the historic street grid in the City. This would be achieved, in part, through new connections to and from BL 81 and Downtown Syracuse. These include a new exit from BL 81 connecting to the northern end of Oswego Boulevard, creating an entrance to Downtown that coincides with the historic alignment of the Oswego Canal, and the extension of Pearl Street south, re-establishing its historic alignment.

Throughout the area where the existing elevated highway would be removed, the Community Grid Alternative would reduce visual obstructions and create more extended views. As a result, visual and spatial relationships within the built environment would be restored between the Downtown area and adjacent neighborhoods that share a common history and pattern of development. In addition, replacing elevated portions of I-81 with a broader use of the existing street network offers the opportunity to reconnect established neighborhoods.

Considering mitigation and enhancements, the following work was incorporated in the Project. The proposed Project (Viaduct and Community Grid Alternatives) would include improvements to the Onondaga Creekwalk. Under existing conditions, the Creekwalk extends approximately 1.7 miles from its northern end on the Onondaga Lake front to Genesee Street, where it diverges away from Onondaga Creek. The removal of infrastructure in the West Street area would allow the creation of a new path along the west bank of Onondaga Creek between Erie Boulevard and Evans Street. Two ramps between northbound West Street and an elevated portion of Erie Boulevard would be replaced with a single connector roadway. The additional space would be used to accommodate a shared use (bicycle/pedestrian) path and sidewalk along the east side of West Street from Erie Boulevard to West Genesee Street. Connectivity would be enhanced in this area because of the links (via West Genesee Street) between the new shared use (bicycle/pedestrian) path on the west bank of the creek, the existing Creekwalk on the east bank, and the sidewalks along both West Street and West Genesee Street.

The proposed new segment would extend the Creekside portion of the existing network approximately 3,000 feet south from Genesee Street to Erie Boulevard, providing access to natural and historic resources and to views, which are now obstructed, of a historic Erie Canal aqueduct and stone bridge over the Creek.

Visual simulations of the Onondaga Creekwalk are provided in **Appendix D, Photographs and Visualizations**.

Auditory Elements

Noise modeling was conducted to analyze traffic noise levels under existing conditions (2013) for the Viaduct and Community Grid Alternatives (2050). Modeling was conducted at receivers in areas within and adjacent to historic properties, and the following characterizes noise changes at four representative locations in downtown Syracuse.

- In Franklin Square, the existing noise level is 60 decibels (dBA). Noise levels increase from 60 dBA to 64 dBA under the Viaduct Alternative, and they increase from 60 dBA to 63 dBA under the Community Grid Alternative. The change in noise level would be less than 3 dB under the Community Grid Alternative, which is not considered perceptible based on the FHWA's "Highway

Traffic Noise: Analysis and Abatement Guidance.” The change in noise level under the Viaduct Alternative (4 dBA) may be perceptible based on the FHWA guidance.

- In the vicinity of the Erie Canal Museum, the existing noise level is about 67 dBA. Noise levels would remain about the same under the Viaduct Alternative. They would increase by about 1 dB (68 dBA) under the Community Grid Alternative. These changes in noise levels would not be considered perceptible based on the FHWA’s “Highway Traffic Noise: Analysis and Abatement Guidance.”
- In front of Peck Hall, the existing noise level of 67 dBA would increase to 72 dBA under the Viaduct Alternative. The change in noise level under the Viaduct Alternative (5 dBA) may be perceptible based on the FHWA guidance. Under the Community Grid Alternative, noise levels would decrease to 62 dBA.
- At points near I-81 in the North Salina Street Historic District, the existing noise level is about 65 dBA. Under the Viaduct and Community Grid Alternatives, the predicted noise levels would increase to 66 dBA. These changes in noise levels would not be considered perceptible based on the FHWA’s “Highway Traffic Noise: Analysis and Abatement Guidance.”

Under the Viaduct and Community Grid Alternatives, the changes in highway traffic noise levels in areas within and adjacent to historic properties would be imperceptible or barely perceptible to the human ear, compared to existing conditions. Neither of the Build Alternatives would diminish the integrity of setting of historic properties through the introduction of audible elements.

4. BASIS FOR RECOMMENDED PROJECT FINDING

The FHWA, in coordination with the NYSDOT and in consultation with the SHPO, has applied the *Criteria of Adverse Effect* (36 CFR §800.5(a)(1)) to National Register listed and eligible architectural properties within the APE for the Viaduct Alternative and the Community Grid Alternative, the two Build alternatives that are evaluated in the Draft EIS for the Project. In accordance with 36 CFR §800.5(a)(3), a phased process will be used to apply the criteria of adverse effect to any National Register eligible archaeological properties that may be identified through the phased identification and evaluation process described in the Phase IB Work Plan, 2017.

Viaduct Alternative

The Viaduct Alternative would cause *adverse effects* on the National Register-listed North Salina Street Historic District (including 1999 and 2016 Expansions) resulting from the proposed removal and demolition of two contributing resources, the Britton Block at 317-327 North Salina Street and the Learbury Centre at 329 North Salina Street. In addition, the Viaduct Alternative would cause *adverse effects* on the following known individual historic properties due to the proposed demolition and removal of historic buildings:

- NY Central Railroad Freight Station (815 Erie Boulevard, 400 Burnet Avenue & 711-21 Erie Boulevard)
- Veteran’s Fastener Supply Corporation (117 Butternut Street)
- Smith Restaurant Supply (500 Erie Boulevard)

- Peck Hall (309 South McBride Street)
- Reid Hall (610 East Fayette Street)
- Syracuse Herald Building (212 Herald Place)
- VIP Structures (471-81 Oswego Boulevard)
- Wag Foods (909 N State Street)
- Howard & Jennings Pump Factory (123-129 Willow Street East)

Photographs of buildings and structures that would be affected under the Viaduct Alternative are provided in **Appendix D, Photographs and Visualizations.**

Additionally, minor acquisitions of land are proposed from the following four (4) historic properties under the Viaduct Alternative. The Project would have *no adverse effect* on the following historic properties:

- C.C. Bradley Plant (432 Franklin Street North to Clinton Street)
- Syracuse Lighting Co. Plant (311 Genant Drive to Clinton Street North)
- Remington (Monarch) Typewriter Company Building (429 N Franklin St)
- Former Easy Washing Machine Co. (currently Destiny Arms) (800 Clinton Street North)

Community Grid Alternative

The Community Grid Alternative has been identified as the Project's preferred alternative, as indicated in the Draft EIS. As a result of design modifications, the Community Grid Alternative would cause no adverse effects to known historic architectural properties. Table 1 identifies minor acquisitions of land as proposed from fourteen (14) historic properties under the Community Grid Alternative, with no changes to the contributing features that qualify these properties for the National Register. Therefore, the Project would have *no adverse effect* on the following historic properties:

- Learbury Centre (329 North Salina Street), North Salina Street Historic District & Expansion
- NY Central Railroad Complex (815 Erie Boulevard, 400 Burnet Avenue and 711-21 Erie Boulevard)
- Veteran's Fastener Supply Corporation Building (117 Butternut Street)
- Peck Hall (309 South McBride Street) temporary easement only
- Reid Hall (610 East Fayette Street) - temporary easement only
- Syracuse Herald Building (212 Herald Place)
- Howard & Jennings Pump Factory (123-29 Willow Street East)
- C.C. Bradley Plant (432 Franklin St North to Clinton), Franklin Square Historic District
- Syracuse Lighting Co. Plant (311 Genant Drive to Clinton Street North), Franklin Square Historic District
- Saint John the Evangelist Church (215 North State Street)
- VIP Structures (471-81 Oswego Boulevard)
- Remington (Monarch) Typewriter Company Building (429 North Franklin Street), Franklin Square Historic District
- Former Easy Washing Machine Co. (currently Destiny Arms) (800 Clinton Street North)
- The Heritage at Loretto (312 Fillmore Avenue)

Archaeological Resources

No National Register eligible archaeological properties have been identified within the APE as a result of the Phase IB archaeological survey completed to date, consisting of preconstruction shovel testing. The remaining steps to complete archaeological investigations, as described in the Phase IB Work Plan, will be carried out as access is gained to locations designated for machine-aided excavation and for archaeological monitoring during construction. The NYSDOT in coordination with the FHWA will provide information and consult with the SHPO to evaluate the eligibility of any identified archaeological resources. In addition, the FHWA in coordination with the NYSDOT will provide the same information and consult with the Onondaga Nation and the Tuscarora Nation to seek their opinions regarding the identification and evaluation of any Native American archaeological sites, cultural materials, or human remains encountered.

For any National Register eligible archaeological property identified during preconstruction investigations or archaeological monitoring during construction as described in the approved Phase IB Work Plan, 2017, or as an unanticipated discovery during construction, the FHWA in coordination with the NYSDOT will consult with the SHPO, the Onondaga Nation, and the Tuscarora Nation to consider measures that would avoid, minimize, or mitigate adverse effects. If human remains are discovered during construction, the FHWA in coordination with the NYSDOT will implement consultation with the SHPO, the Onondaga Nation, and the Tuscarora Nation as described in the *SHPO/ NYSOPRHP Human Remains Discovery Protocol*, the *Haudenosaunee Protocol for Handling Discovery of Human Remains*, and the *NYSDOT Procedures in the Event of the Inadvertent Discovery of Human Remains during Construction* (Phase IB Work Plan, 2017, Appendices A-C).

The final identification and evaluation of archaeological properties within the APE will be completed during construction of the Project. Therefore, the Project's effects on historic properties cannot be fully determined prior to approval of the Section 106 undertaking.

Section 106 Agreement Document

The FHWA, in coordination with the NYSDOT, proposes the development of a Programmatic Agreement (PA) pursuant to 36 CFR § 800.14(b)(1)(ii) in consultation with the SHPO, the Advisory Council on Historic Preservation (ACHP), the Onondaga Nation, the Tuscarora Nation, and other Consulting Parties to provide for a phased process to determine effects on any archaeological properties that may be identified as the Project is advanced through construction. The PA will ensure that the identification and evaluation of archaeological properties is completed by stipulating the implementation of the approved Phase IB Work Plan, 2017 and procedures for consultation with the SHPO, Onondaga Nation, and Tuscarora Nation. In addition, the PA will include a consultation protocol to consider measures to avoid, minimize, or mitigate adverse effects on any National Register eligible archaeological properties identified through that process.

In the event of future design changes, the PA would include a provision to assess the need for additional identification efforts to consider potential effects on additional historic properties that were not previously considered as part of the current evaluation.

As part of the continuing Section 106 consultation process, the FHWA in coordination with the NYSDOT, will provide an opportunity for the SHPO, Onondaga Nation, Tuscarora Nation, other Consulting Parties, and the public to review and comment on a draft PA.

5. SECTION 106 CONSULTING PARTIES

The NYSDOT and the FHWA initiated consultation with the SHPO in 2014, with a field meeting to provide an overview of the Project, observe existing conditions, and seek input on an approach for the identification of archaeological resources. The discussion also included the coordination of the Section 106 process with the NEPA.

The FHWA in coordination with the NYSDOT has conducted the following activities to identify additional Consulting Parties and invite their participation in the Section 106 process.

Advisory Council on Historic Preservation

In response to requests from the FHWA on June 16, 2014 and April 11, 2016, the ACHP is participating in Section 106 consultation for the Project. The ACHP is also a Cooperating Agency in accordance with the NEPA process.

Onondaga Nation and Tuscarora Nation

The Onondaga Nation has a consultation role in accordance with 36 CFR §800.2(c)(ii), having previously identified a geographical area of interest for Section 106 consultation that includes the project location. The FHWA formally initiated government-to-government consultation with the Onondaga Nation for the Project by letter dated June 16, 2014. On June 29, 2016, a representative of the Onondaga Nation participated in a general meeting of Section 106 Consulting Parties. The NYSDOT and the FHWA held three separate meetings⁵ with the Onondaga Nation representatives between July 2016 and June 2017 to provide an overview of the Project, hear the Nation's concerns regarding potentially sensitive locations, and discuss the approach for archaeological investigations. On August 12, 2019 the NYSDOT and the FHWA held a meeting with representatives of the Onondaga Nation to discuss the findings described in the draft Phase IB Survey.

In December 2017, the Tuscarora Nation notified the FHWA that Onondaga County is within their geographical area of interest for Section 106 consultation. The NYSDOT, on behalf of the FHWA, sent a letter to the Tuscarora Nation on September 13, 2018, initiating Section 106 consultation for the Project. The Tuscarora Nation was invited to participate in the August 12, 2019 meeting with the Onondaga Nation.

The NYSDOT and the FHWA provided the Onondaga Nation and Tuscarora Nation with copies of Phase IB Survey, 2020 on September 25, 2020.

⁵ The FHWA and NYSDOT held consultation meetings with the Onondaga Nation on July 14, 2016, October 6, 2016, and June 13, 2017. In addition, a representative of the Onondaga Nation participated in a general meeting of Section 106 Consulting Parties prior to the July 2016 meeting.

A Section 106 Documentation Package, consisting of the Architectural Resources Survey Addendum, 2020, the Finding Documentation, and the draft PA, will be provided to the Onondaga Nation and the Tuscarora Nation during the timeframe of the public comment period for the Draft EIS. Comments submitted by the Onondaga Nation and Tuscarora Nation within this timeframe will be considered by the FHWA, in consultation with the NYSDOT, the SHPO, and the ACHP. The FHWA and the NYSDOT will continue consultation with the Onondaga Nation and Tuscarora Nation throughout the Project's remaining archaeological field investigations, as outlined in the Phase IB Work Plan, 2017.

Other Consulting Parties

Invitations were extended to public agencies, preservation groups, and other stakeholders to identify additional Consulting Parties with a demonstrated interest in the Project due to a legal or economic relation to affected properties, or a concern with the Project's effects on historic properties, pursuant to 36 CFR §800.2(c)(5). A public notice, published in English and Spanish in local newspapers, advised individuals and organizations with a demonstrated interest of the opportunity to participate in the Section 106 process as a Consulting Party. Copies of *A Citizen's Guide to Section 106 Review*, published by the ACHP, applications for Consulting Party status, and other information about the Section 106 process were made available at the public meetings and Project website.

The FHWA and the NYSDOT coordinated to identify, approve, and notify applicants of their status as Section 106 Consulting Parties. The following organizations requested Consulting Party status and were approved by the FHWA:

- Syracuse-Onondaga County Planning Agency (SOCPA)
- Syracuse Housing Authority
- Syracuse Metropolitan Council
- Town of DeWitt Historian, Historical Preservation Society
- Preservation League of New York State
- City of Syracuse, Department of Engineering
- Downtown Committee of Syracuse
- Preservation Association of Central New York
- Central New York Chapter of the American Institute of Architects (AIA-CNY)
- Central New York Regional Planning and Development Board
- The Erie Canal Museum
- The Northside Urban Partnership
- Northeast Hawley Development Association, Inc.
- Quante Wright
- Douglas Armstrong
- Historic Oakwood Preservation Association

On June 29, 2016, the NYSDOT, in coordination with the FHWA, met with Section 106 Consulting Parties to present the results of preliminary historic resource and archaeological studies completed to date. Consulting Parties were provided a 30-day review period to comment and provide input on the identification of historic properties. On August 12, 2019, a second Consulting Parties meeting was held, and the draft Finding

Documentation was distributed to Consulting Party members to provide an opportunity for review and comment on the preliminary assessment of effects on historic properties. Comments received on the draft Finding Documentation were considered as part of Section 106 consultation for the Project (**Appendix C, Correspondence**).

A Section 106 Documentation Package will be distributed to Consulting Parties, providing a 30-day review period for comments on the draft PA concurrent with the public comment period for the Draft EIS. Comments submitted by Consulting Parties within this timeframe will be considered by the FHWA, in consultation with the NYSDOT, the SHPO, and the ACHP.

6. PUBLIC INVOLVEMENT

Public involvement in the Section 106 process is being carried out in coordination with the environmental review process under NEPA. Public outreach efforts, commensurate with the nature and complexity of the Project, have provided opportunities for public input regarding the Project alternatives and their potential effects on historic properties. These efforts include project update presentations, neighborhood meetings, individual stakeholder and stakeholder group meetings, a Project website and hot line, press releases, the distribution of informational materials, and outreach at local community events.

- A Project Outreach Center, established in conjunction with Onondaga County and the City of Syracuse, serves as a resource for members of the public to access information, ask questions, and learn about the Project.
- Local Project Repositories enable members of the public to examine Project documents, including EIS documents, and other informational materials. The repositories include agency and municipal offices, libraries, and community centers.
- During the Scoping phase of the Project, public meetings held on November 13, 2013 and on June 26, 2014 provided members of the public with early opportunities for input on potential alternatives under consideration at that time. Substantive comments submitted during the Scoping comment period, ending September 2, 2014, were summarized and responded to in the *Scoping Report*, which was made publicly available in April 2015.
- Public comments included a concern for the potential loss of historic resources, the fracturing of neighborhoods and loss of historic character. Comments received to date also indicate an interest in improving connectivity and community cohesion within the context of the Downtown's architectural heritage.
- Information concerning the assessment of effects on historic properties is being made available to the public by incorporating this Finding Documentation in the Draft EIS. A public hearing to be held following the publication of the Draft EIS will include an open house, a presentation, and a chance for attendees to submit comments on the Draft EIS orally and in writing. The public also will be invited to submit comments during the Draft EIS comment period (a minimum of 45 days), providing an opportunity for members of the public to express their views.

7. APPENDICES

A. Figures

Figure 1: Project Location Map

Figures 2a-2f:

- o Area of Potential Effects (APE) and Locations of Identified Historic Properties
- o Property Key

Figures 3: Viaduct Alternative Overview

Figure 4: Community Grid Alternative Overview

Figure 5: Area of Potential Effect

- B. Proposed Changes to Identified Historic Properties in the APE
- C. Correspondence
- D. Photographs and Visualizations