

**Appendix E-4**  
**Finding Documentation**

**Part 4 of 5**

# **APPENDIX C**

## **Correspondence**

# **APPENDIX C**

## **Correspondence**

From FHWA to Onondaga Nation, Section 106 Consultation, June 16, 2014

From FHWA to ACHP, Section 106 Consultation, June 16, 2014

From NYSDOT to FHWA, Section 106 Consulting Party Status, November 12, 2014

From FHWA to NYSDOT, Section 106 Consulting Party Status, November 19, 2014

From FHWA to ACHP, Section 106 Consultation Process, April 11, 2016

From NYSDOT to Consulting Parties, Sample Consulting Party Meeting Invitation, June 15, 2016

From NYSDOT to SHPO, Section 106 Area of Potential Effects, September 6, 2016

From SHPO to NYSDOT, Section 106 APE, Architectural Resources Report, Phase IA Archaeological Sensitivity Assessment, September 22, 2016

From NYSDOT to FHWA, Phase IA Archeological Sensitivity Assessment, Architectural Resources Report, September 27, 2016

From NYSDOT to Onondaga Nation, Phase IA Archaeological Sensitivity Assessment, Architectural Resources Survey, September 30, 2016

From Onondaga Nation to NYSDOT, Phase IA Archaeological Sensitivity Assessment, November 14, 2016

From NYSDOT to SHPO, Continuing Consultation Architectural Resources Survey, November 21, 2016

From SHPO to NYSDOT, Response to Continuing Consultation Architectural Resources Survey, December 7, 2016

From NYSDOT to SHPO, Continuing Consultation Architectural Resources Survey, December 21, 2016

From Onondaga Nation to NYSDOT, Pre-DDR/DEIS comments, March 1, 2017

From NYSDOT to Onondaga Nation, Phase IA Archaeological Sensitivity Assessment, May 19, 2017

From NYSDOT to Onondaga Nation, Transmit draft Phase IB Work Plan, June 7, 2017

From NYSDOT to SHPO, Transmit draft Phase IB Work Plan, June 7, 2017

From SHPO to NYSDOT, Phase IB Work Plan comments, July 19, 2017

From Onondaga Nation to NYSDOT, Phase IB Work Plan comments, July 23, 2017

From NYSDOT to SHPO, Information letter about Phase IA Archaeological Sensitivity Report upload to CRIS to keep CRIS information up to date, September 14, 2017

From NYSDOT to SHPO, Informational letter about Architectural Resources Survey Report upload to CRIS to keep CRIS information up to date, September 25, 2017

From SHPO to NYSDOT, Response regarding Phase IA Archaeological Sensitivity Report upload to CRIS, October 2, 2017

From NYSDOT to SHPO, Transmit final Phase IB Work Plan, October 10, 2017

From NYSDOT to FHWA, Transmit final Phase IB Work Plan, October 10, 2017

From NYSDOT to Onondaga Nation, Transmit final Phase IB Work Plan, October 10, 2017

From NYSDOT to FHWA, Section 106 Consulting Party Status- Wright, October 30, 2017

From SHPO to NYSDOT, no comments for final Phase IB Work Plan, November 3, 2017

From FHWA to NYSDOT, Section 106 Consulting Party Status- Wright, November 7, 2017

From FHWA to Tuscarora Nation, Initiate Consultation, September 13, 2018

From NYSDOT to FHWA, Section 106 Consulting Party Status – Armstrong, September 21, 2018



From FHWA to NYSDOT, Section 106 Consulting Party Status- Armstrong, October 4, 2018

From NYSDOT to Consulting Parties, Sample Consulting Party meeting invitation, July 10, 2019

From NYSDOT to SHPO, Transmit draft Phase IB Survey, July 23, 2019

From NYSDOT to Tuscarora Nation, Transmit Archaeological reports, August 2, 2019

From NYSDOT to Onondaga Nation, Transmit draft Phase IB Survey, August 2, 2019

From NYSDOT to Consulting Parties, Sample Transmit draft Finding Documentation, August 15, 2019

From NYSDOT to Onondaga Nation, Transmit draft Finding Documentation, August 15, 2019

From NYSDOT to Tuscarora Nation, Transmit draft Finding Documentation, August 16, 2019

From NYSDOT to ACHP Transmit draft Finding Documentation and draft Phase IB Survey report, August 16, 2019

From Onondaga Nation to NYSDOT, Transmit draft Phase IB Survey comments, September 4, 2019

From CP-CCC to NYSDOT, comment on draft Finding Documentation, September 11, 2019

From CP-DAB to NYSDOT, comment on draft Finding Documentation, September 12, 2019

From CP-KA to NYSDOT, comment on draft Finding Documentation, September 12, 2019

From Onondaga Nation to NYSDOT, development of Programmatic Agreement, November 8, 2019

From NYSDOT to Onondaga Nation, development of Programmatic Agreement, November 26, 2019

From NYSDOT to SHPO, Section 106 Consultation, December 3, 2019

From SHPO to NYSDOT, Section 106 Consultation, February 24, 2020

From NYSDOT to SHPO, Transmit Phase IB Survey, September 25, 2020

From NYSDOT to Tuscarora Nation, Transmit Phase IB Survey, September 25, 2020

From NYSDOT to Onondaga Nation, Transmit Phase IB Survey, September 25, 2020

From NYSDOT to SHPO, Transmit Architectural Resources Survey Addendum, October 1, 2020

From SHPO to NYSDOT, Architectural Resources Survey Addendum, October 14, 2020

From NYSDOT to ACHP, Transmit Architectural Resources Survey Addendum, October 20, 2020

From NYSDOT to FHWA, Transmit Architectural Resources Survey Addendum, October 20, 2020

From SHPO to NYSDOT, comments on Phase IB Survey, September 26, 2020

From NYSDOT to Onondaga Nation, Transmit SHPO comments on Phase IB Survey, October 30, 2020

From Onondaga Nation to NYSDOT, comments on Phase IB Survey, November 4, 2020

From Onondaga Nation to NYSDOT, comments on Site Monitoring and Worker Training, November 4, 2020

From FHWA to NYSDOT, concur Architectural Resources Survey Addendum, November 7, 2020

From NYSDOT to FHWA, Request for Approval of Section 106 Consulting Party, December 2, 2020

From FHWA to NYSDOT, Approval of Section 106 Consulting Party, December 4, 2020

From NYSDOT to Onondaga Nation, response to Phase IB Survey comments,  
December 18, 2020

From NYSDOT to Onondaga Nation, response to comments on Site Monitoring  
and Worker Training, December 21, 2020

From NYSDOT to SHPO, request concurrence Phase IB Survey, January 8, 2021

From SHPO to NYSDOT, concurrence Phase IB Survey, January 11, 2021





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

**New York Division**

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
New York.FHWA@dot.gov

In Reply Refer To:  
HED-NY

June 16, 2014

Kelly Fanizzo, Historic Preservation Specialist  
Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
The Old Post Office Building, Suite 809  
1100 Pennsylvania Avenue NW  
Washington, DC 20004

Subject: PIN 3501.60, Interstate 81 Viaduct Project  
City of Syracuse  
Onondaga County, New York

Dear Ms. Fanizzo:

We would like to formally invite the Advisory Council on Historic Preservation (Council) to participate in the Section 106 consultation process for the subject project.

The Federal Highway Administration (FHWA), in cooperation with the New York State Department of Transportation (NYSDOT), is preparing an Environmental Impact Statement (EIS) for the Interstate 81 (I-81) Viaduct Project in accordance with the National Environmental Policy Act (NEPA). The Notice of Intent to prepare an EIS for the Project was published in the *Federal Register* on August 26, 2013.

The purpose of the I-81 Viaduct Project is to address the structural deficiencies and nonstandard highway features in the I-81 corridor while creating an improved corridor through the City of Syracuse that meets transportation needs and provides the transportation infrastructure to support long-range planning efforts (i.e., Syracuse Metropolitan Transportation Council Long Range Transportation Plan and Syracuse Comprehensive Plan). The I-81 Viaduct Project objectives that have been established to support the Project's purpose and need are to:

- Address structural deficiencies and improve bridge ratings in the I-81 viaduct priority area;
- Address identified geometric and operational deficiencies in the I-81 viaduct priority area;
- Maintain the connections within the local street network within or adjacent to the I-81 viaduct priority area;
- Provide enhanced bicycle and pedestrian surface connections on streets across and along the I-81 viaduct;

- Maintain or enhance vehicle access to the interstate highway network and key destinations (i.e., central business district, hospitals and institutions) within the I-81 viaduct priority area.

The purpose, need and objectives are the basis for determining a reasonable range of alternatives for the I-81 Viaduct Project.

Alternatives under consideration in the scoping process are the No Build Alternative; Viaduct (including rehabilitation or reconstruction of the existing highway); Street-level (includes conversion of the existing highway to a non-interstate facility); Tunnel; Depressed Highway; Western Bypass; and West Street. The EIS will include a reasonable range of alternatives that meet the project purpose and need and are considered feasible and practical based on engineering, cost, and social, economic and environmental considerations.

There are several historic resources in the vicinity of the project area that will be considered and analyzed under the Section 106 process for the subject project. In addition, the local community is very active in participating in the NEPA/EIS and Section 106 consultation process.

We strongly encourage and request the Council to participate in the Section 106 consultation process in order to ensure that the EIS adequately address potential impacts, if any, that our project may have on the historic resources in the vicinity of the project area.

If you have any questions or would like to discuss the project, please contact Tricia Millington at (518) 431-8844.

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Davies", with a stylized flourish at the end.

Robert M. Davies  
District Engineer

cc: Ruth Pierpont, OPRHP  
Mark Frechette, Project Director, Region 3, NYSDOT  
Daniel Hitt, Director, Environmental Science Bureau, NYSDOT





STATE OF NEW YORK  
DEPARTMENT OF TRANSPORTATION  
ALBANY, N.Y. 12232

WWW.DOT.NY.GOV

JOAN McDONALD  
COMMISSIONER

ANDREW M. CUOMO  
GOVERNOR

November 12, 2014

Tricia Millington  
Area Engineer  
Federal Highway Administration  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, New York 12207

**RE: REQUEST FOR APPROVAL OF SECTION 106 CONSULTING PARTY STATUS  
INTERSTATE 81 (I-81) VIADUCT PROJECT  
CITY OF SYRACUSE, ONONDAGA COUNTY, NEW YORK  
PIN 3501.60**

Dear Ms. Millington:

Please find enclosed for consideration by the Federal Highway Administration (FHWA), requests for Section 106 Consulting Party status for the I-81 Viaduct Project, submitted to the New York State Department of Transportation (NYSDOT) in accordance with 36 CFR Part 800.2(c)(5):

*Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.*

The enclosed requests were submitted in response to a letter, dated June 16, 2016, NYSDOT sent to regional organizations with an interest in historic resources to inform them of the potential opportunity to participate as a Consulting Party. A public notice was also published in the *Post Standard* on June 15, 2014, and a Public Scoping meeting held in Syracuse, New York on June 26, 2014, informing the public of the opportunity to participate in the Section 106 consultation

process. The enclosures include copies of all written requests received by NYSDOT as formal letters, forms and e-mails, as well as a comprehensive list prepared by NYSDOT in a table format for your convenience.

The NYSDOT Office of Environment, in coordination with Region 3, has reviewed the enclosed requests and recommends the following individuals and organizations for Consulting Party status, based on their written statements of interest.

1. **Andrew Maxwell** (Director) – *Syracuse-Onondaga County Planning Agency*
2. **Owen Kerney** (Assistant Director) – *Syracuse-Onondaga County Planning Agency*
3. **Kate Auwaerter** (Preservation Planner) – *Syracuse-Onondaga County Planning Agency*
4. **Bill Simmons** (Director) – *Syracuse Housing Authority*
5. **Craig L. Corriders** (Housing Property Manager) – *Syracuse Housing Authority*
6. **James D'Agostino** (Director) – *Syracuse Metropolitan Transportation Council*
7. **Eleanor L. Johnson** (Town of DeWitt Historian) – *Historical Preservation Society*
8. **Daniel Mackay** (Director of Public Policy) – *Preservation League of New York State*
9. **Mary Robison, P.E.** (City Engineer) – *City of Syracuse, Department of Engineering*
10. **Merike Treier** (Executive Director) – *Downtown Committee of Syracuse*
11. **Murray F. Gould** (President) – *Preservation Association of Central New York*
12. **Dean Biancavilla** (Chairman) – *AIA Central New York Chapter of The American Institute of Architects*
13. **David Bottar** (Executive Director) – *Central New York Regional Planning and Development Board (CNYRPDB)*
14. **Diana Goodsight** (Executive Director) – *The Erie Canal Museum*
15. **Jonathan Logan** (Program Manager) – *The Northside Urban Partnership*
16. **Michael La Flair** (Executive Director) – *Northeast Hawley Development Association, Inc.*



The Onondaga Nation has been identified as having a consultative role in accordance with 36 CFR Part 800.2(c)(ii), since they have previously identified a geographical area of interest for Section 106 consultation that includes the Project location in the City of Syracuse, Onondaga County, New York.

We respectfully request FHWA approval of the sixteen (16) above-referenced individuals and organizations, granting Consulting Party status for participation in the Section 106 process.

If you have any questions, please feel free to contact Jessica Andersen at [Jessica.Andersen@dot.ny.gov](mailto:Jessica.Andersen@dot.ny.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Dan Hitt", with a stylized flourish at the end.

DANIEL P. HITT, RLA  
(Acting) Co-Director, Office of Environment

Enclosures

cc: Robert Davies, FHWA  
John Bonafide, OPRHP / SHPO  
Chris Wilson, ACHP  
Mark Frechette, NYSDOT



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

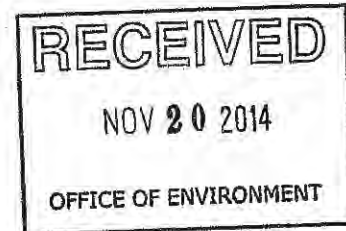
**New York Division**

November 19, 2014

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
New York.FHWA@dot.gov

In Reply Refer To:  
HED-NY

Daniel P. Hitt, RLA  
Acting Co-Director, Office of the Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232



Subject: PIN 3501.60 – Interstate 81 Viaduct Project  
City of Syracuse, Onondaga County  
Section 106 Consulting Party Status

Dear Mr. Hitt:

We have received your November 12 letter transmitting a request for Section 106 consulting party status on the Interstate 81 Viaduct Project. After reviewing the information contained in the individual request, we have approved the following to be consulting parties to the Section 106 process for the subject project:

1. Andrew Maxwell, Director, Syracuse-Onondaga County Planning Agency
2. Owen Kerney, Assistant Director, Syracuse-Onondaga County Planning Agency
3. Kate Auwaerter, Preservation Planner, Syracuse-Onondaga County Planning Agency
4. Bill Simmons, Director, Syracuse Housing Authority
5. Craig L. Corriders, Housing Property Manager, Syracuse Housing Authority
6. James D'Agostino, Director, Syracuse Metropolitan Council
7. Eleanor L. Johnson, Town of DeWitt Historian, Historical Preservation Society
8. Daniel Mackay, Director of Public Policy, Preservation League of New York State
9. Mary Robinson, P.E., City Engineer, City of Syracuse, Department of Engineering
10. Merike Treier, Executive Director, Downtown Committee of Syracuse
11. Murray F. Gould, President, Preservation Association of Central New York
12. Dean Biancavilla, Chairman, Central New York Chapter of the American Institute of Architects
13. David Bottar, Executive Director, Central New York Regional Planning and Development Board
14. Diana Goodsight, Executive Director, The Erie Canal Museum
15. Jonathan Logan, Program Manager, The Northside Urban Partnership
16. Michael La Flair, Executive Director, Northeast Hawley Development Association, Inc.

Furthermore, we acknowledge that the Onondaga Nation has previously been identified as having a consultative role in accordance with 36 CFR Part 800.2(c)(ii), since they previously identified a geographical area of interest for Section 106 consultation that includes the project location.

We would like to stress the importance of defining the roles and responsibilities of the respective parties. Consulting party status entitles these individuals/organizations to share views, receive and review pertinent information, offer ideas, and consider possible solutions together with the Federal Highway Administration or other consulting parties. Please ensure each consulting party has a copy of the Advisory Council on Historic Preservation's (ACHP) guide entitled "Protecting Historic Properties: A Citizen's Guide to Section 106 Review". A future meeting may be beneficial to review the roles and responsibilities, provide a project overview and to address any expectations consulting party members may have.

If you have any questions, please feel free to contact me at (518) 431-8844.

Sincerely,



Patricia M. Millington  
Area Engineer

cc: Ruth Pierpont, NYS Office of Parks, Recreation, and Historic Preservation  
Chris Wilson, Advisory Council on Historic Preservation



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

**New York Division**

April 11, 2016

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
518-431-4121  
NewYork.FHWA@dot.gov

In Reply Refer To:  
HED-NY

Mr. Reid Nelson  
Director of Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
401 F Street NW, Suite 308  
Washington, DC 20001-2637

Attention: Mr. Christopher Wilson, Program Analyst

Subject: PIN 3501.60 I-81 Viaduct Project  
City of Syracuse, Onondaga County  
Section 106 Consultation Process

Dear Mr. Nelson:

With reference to the provisions of 36 CFR 800.6(a)(1)(i)(A) and our previous telephone conversation with Mr. Wilson of your staff, we would like to formally invite the Advisory Council on Historic Preservation to participate in the Section 106 consultation process for the subject project.

The Federal Highway Administration (FHWA) has yet to make a formal Section 106 determination regarding this project. However, in consultation with the New York Department of Transportation (NYSDOT) and New York State Historic Preservation Officer (SHPO), and with the confining transportation right-of-way the urban setting of the project offers, we anticipate that all of the alternatives being studied in the Environmental Impact Statement (EIS) will have an adverse effect on properties on or determined to be eligible for the National Register of Historic Places.

This project has several complex and challenging issues associated with it primarily due to its location in an urban neighborhood setting. An extensive scoping and alternative development process has been undertaken over the last several years to identify potential alternatives which will be advanced in an Environmental Impact Statement (EIS) under NEPA. This EIS process has now been expedited to meet a deadline established by the project sponsor of publishing the Draft EIS by the close of 2016.

FHWA believes that every reasonable effort has been made to date in the development and refinement of the various alternatives to minimize impacts on historic resources. However, there are indications that this project may be subject to potential litigation. Consequentially, we are requesting your participation in the on-going consultation process in order to provide additional guidance and assessment that the Section 106 process is being implemented properly and that the views and opinions of all consulting party members are being considered fairly and

appropriately. Our expectation is that through the Council's participation in the process, we will ensure that the views of consulting party members are appropriately considered in the development of measures to avoid, minimize, and mitigate adverse effects on historic properties, and that the Memorandum of Agreement accurately reflects the outcome of consultation for the resolution of adverse effects.

NYSDOT is currently in the process of developing the area of potential effect for each of the alternatives after which we expect to receive information regarding the recommended historic properties. Once a project schedule has been provided, we will share that with you. In the interim, we invite you to participate in the next Cooperating Agency meeting which is currently scheduled for May 11 at 11:00 am. In addition, if it is of interest, there is a project site visit tentatively planned for July 13 with each of the Cooperating Agencies.

If you have any questions, please feel free to me at (518) 431-8844.

Sincerely,



Patricia M. Millington  
Area Engineer

cc: M. Frechette, NYSDOT Region 3, I-81 Viaduct Project Director  
D. Hitt, Director, NYSDOT Office of the Environment  
R. Pierpont, Deputy Commissioner for Historic Preservation, NYSHPO



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

**New York Division**

June 15, 2016

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
New York.FHWA@dot.gov

In Reply Refer To:  
HED-NY

[Recipient Name]  
[Recipient Title]  
[Recipient Company]  
[Recipient Street Address]  
[Recipient City, STATE Zip]

**RE: Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York (PIN 3501.60)  
US National Historic Preservation Act, Section 106 Participation  
Consulting Party Meeting**

Dear [Mr./Ms. Recipient Last Name]:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project, the Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), cordially invites you to participate in a meeting to be held on Wednesday, June 29, 2016 at 10:00 a.m. at the Carnegie Building located at 335 Montgomery Street, Syracuse. A map is enclosed for your convenience.

The purpose of this meeting is to engage Consulting Parties in the Section 106 process for the I-81 Viaduct Project by providing an overview of the Project, the current status of Section 106 review, and to provide the Consulting Parties with an opportunity to provide input on the historic nature of the properties within the study area. Consulting Parties will also have an opportunity to discuss the upcoming assessment of effects with representatives from the FHWA and NYSDOT at a future meeting to be held later this year.

The Section 106 process and role of Consulting Parties is described in the enclosed publication of the Advisory Council on Historic Preservation (ACHP), "Protecting Historic Properties: A Citizen's Guide to Section 106 Review." In accordance with Section 106 of the National Historic Preservation Act, and regulations issued by the ACHP, Consulting Parties have a designated role in Section 106 review separate from the general public.

**Please RSVP no later than the close of business on June 23, 2016** by contacting the NYSDOT Main office: Anne Bortle, Secretary, at (518) 457-5672 or via e-mail at [Anne.Bortle@dot.ny.gov](mailto:Anne.Bortle@dot.ny.gov). If you are unable to attend in person but would like to participate via conference call, a number will be generated and provided for your use.

If you have any questions or would like additional information, please feel free to contact Jessica Prockup, NYSDOT, at (518) 417-6642 or [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov).

Sincerely,

Robert M. Davies  
District Engineer

RMD/LOS/MS/

Encl: *Protecting Historic Properties: A Citizen's Guide to Section 106 Review*, ACHP  
Map to the Carnegie Building

cc: Ruth Pierpont, Deputy Commissioner/ Deputy SHPO, NYSOPRHP  
Christopher Wilson, Program Analyst, Advisory Council on Historic Preservation  
Daniel P. Hitt, RLA, Director, Office of Environment, NYSDOT  
Mark Frechette, Project Director, NYSDOT  
Joseph Flint, Project Manager, NYSDOT  
Jonathan Adams, NYSDOT





September 6, 2016

Mr. John A. Bonafide  
Director, Technical Preservation Services Bureau  
Division for Historic Preservation  
New York State Office of Parks, Recreation and Historic Preservation  
Peebles Island State Park  
P.O. Box 190  
Waterford, NY 12188-0189

RE: Interstate 81 (I-81) Viaduct Project  
(PIN 3501.60)  
City of Syracuse, Onondaga County  
Section 106 Review Process – Area of Potential Effects

Dear Mr. Bonafide:

The Federal Highway Administration (FHWA), in coordination with the New York State Department of Transportation (NYSDOT), is initiating consultation with the New York State Historic Preservation Office (SHPO), for the I-81 Viaduct Project (Project), in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulation, 36 CFR Part 800.

The primary need of the Project is to address community and agency concern about ongoing congestion, safety issues, and aging infrastructure. Highway design features along I-81 pre-date current design standards and, coupled with heavy traffic volumes, have led to recurring congestion and high accident rates. In addition, the highway infrastructure is nearing the end of its intended design life, and the viaduct and other highway bridges have deteriorated due to age, wear, and harsh winter weather conditions. The purpose of the Project is to address the structural deficiencies and non-standard highway features in the I-81 corridor while creating an improved corridor through the City of Syracuse that meets transportation needs and provides the transportation infrastructure to support long-range planning efforts.

Attached for your review is a document establishing the Project's area of potential effects (APE), as defined in 36 CFR Part 800.16(d). The APE incorporates a geographical area that includes both direct and indirect effects associated with various alternatives including rebuilding the viaduct at its current location or redesignating I-481 as I-81 and re-classifying portions of I-81 as an urban arterial.

Please forward any questions or comments to [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov). We respectfully request the written concurrence of the SHPO with the APE by September 20, 2016.

Sincerely,

Daniel P. Hitt, RLA  
Director, Office of Environment



DH/LOS/JP

Encl: Documentation of Area of Potential Effects

cc: J. Adams, NYSDOT Region 7  
M. Frechette, NYSDOT Region 3  
N. Herter, OPRHP/SHPO  
C. Wilson, ACHP  
R. Davies, FHWA  
T. Millington, FHWA



## Parks, Recreation and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

September 22, 2016

Daniel P. Hitt, RLA  
Director, Office of Environment  
NYS Department of Transportation  
50 Wolf Road  
Albany, NY 12232  
(via email only)

Re: FHWA/NYS DOT  
Interstate 81-Viaduct Project/PIN 3501.60  
Towns of Salina, Cicero and Dewitt/City of Syracuse, Onondaga County  
16PR006314 (13PR05089 and 13PR05437)

Dear Mr. Hitt:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We continue to review this undertaking in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

First, on September 12 our office received material defining the proposed Area of Potential Effects (APE) for this undertaking. We have reviewed this information and concur with your recommendations to the Federal Highway Administration.

This office has also recently completed its review of the report titled: *Architectural Resources Survey, I-81 Viaduct Project- Existing Conditions Survey* (September 2015), which was received by our office on September 19.

This report documents 722 built resources that have been identified as being within the proposed project APE. Within this number we concur with the recommendations of your agency that 77 properties had previously been listed to the National Register of Historic Places (includes 5 non-contributing features). We note that 78 properties had previously been determined National Register eligible (NRE) by our office and we concur with the recommendations of an additional 26 properties being determined NRE.

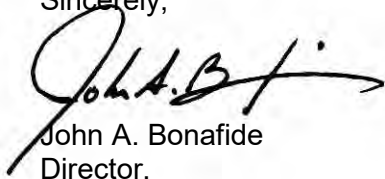
However, the NYSHPO also found that 9 of the 302 properties newly identified in the report as not being eligible for the National Register did, in our opinion, meet the National Register eligibility criteria. This change raises the total number of NRE resources from the proposed 104 to 113.

An additional 93 properties had previously been determined as Not NRE, 139 buildings were found to be less than 50 years old and determined to be not NRE, two previously determined NRE properties were demolished and 5 addresses identified in the report had no information. A full list of the properties and our findings is appended.

The NYSHPO also received a copy of the archaeological report titled: *Phase 1A Archaeological Sensitivity Assessment, I-81 Viaduct Project* (September 2016). Based on our review, we concur with your agency's recommendation to FHWA. We have no issues or concerns with the Phase IB archaeology testing and reporting recommendations provided on pages 234 and 235 of the Phase IA Report. We look forward to continuing consultation on the Phase IB archaeology scope of work once the vertical Area of Potential Effects has been clarified.

If I can be of any further assistance please do not hesitate to contact me at (518) 268-2166 or [john.bonafide@parks.ny.gov](mailto:john.bonafide@parks.ny.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Bonafide", with a stylized flourish extending from the end.

John A. Bonafide  
Director,  
Technical Preservation Services Bureau  
Agency Historic Preservation Officer

Cc: Robert Davies, FHWA (*via email*)

Attachment: Building Eligibility Assessment

# NYSHPO Building Eligibility Assessment

MCD	Property Name/Address		Study Area	Existing NR Status/ USN Number	Description of Historic Property/ Applicable NR Criteria	< 50 Years Old	Recommended Not Eligible	Recommended Eligible	SHPO Recommendation
Cicero	6067	BOURDAGE RD	North				X		Not NRE
Cicero	5903	BRIGADIER DR	North			X			Not NRE
Cicero	5914	BRIGADIER DR	North			X			Not NRE
Cicero	5916	BRIGADIER DR	North			X			Not NRE
Cicero	5918	BRIGADIER DR	North			X			Not NRE
Cicero	5920	BRIGADIER DR	North			X			Not NRE
Cicero	5924	BRIGADIER DR	North			X			Not NRE
Cicero	5928	BRIGADIER DR	North			X			Not NRE
Cicero	5932	BRIGADIER DR	North			X			Not NRE
Cicero	5936	BRIGADIER DR	North			X			Not NRE
Cicero	5938	BRIGADIER DR	North			X			Not NRE
Cicero	5940	BRIGADIER DR	North			X			Not NRE
Cicero	5944	BRIGADIER DR	North			X			Not NRE
Cicero	5858	DEER SPRINGS RD	North			X			Not NRE
Cicero	7170	EASTMAN RD	North				X		Not NRE
Cicero	7178	EASTMAN RD	North			X			Not NRE
Cicero	6217	KENLAREN CIR	North			X			Not NRE
Cicero	6219	KENLAREN CIR	North			X			Not NRE
Cicero	6223	KENLAREN CIR	North			X			Not NRE
Cicero	6225	KENLAREN CIR	North			X			Not NRE
Cicero	6227	KENLAREN CIR	North			X			Not NRE
Cicero	6229	KENLAREN CIR	North			X			Not NRE
Cicero	6233	KENLAREN CIR	North			X			Not NRE
Cicero	6078	KENNETH DR	North			X			Not NRE
Cicero	5895	PINE GROVE RD	North				X		Not NRE
Cicero	5899	PINE GROVE RD	North				X		Not NRE
Cicero	6104	RIDGECREST DR	North			X			Not NRE
Cicero	6108	RIDGECREST DR	North			X			Not NRE
Cicero	6153	SMITH RD	North			X			Not NRE
Cicero	6179	SMITH RD	North				X		Not NRE
Cicero	6187	SMITH RD	North				X		Not NRE
Cicero	5840	SOUTH BAY RD	North			X			Not NRE

Cicero	5845	SOUTH BAY RD	North				X		Not NRE
Cicero	6096	SUNSET PL	North			X			Not NRE
Cicero	6100	SUNSET PL	North			X			Not NRE
Cicero	5892	SUTTON DR	North				X		Not NRE
Cicero	5896	SUTTON DR	North				X		Not NRE
Cicero	5900	SUTTON DR	North			X			Not NRE
Cicero	7620	THOMPSON RD	North				X		Not NRE
Cicero	7623	THOMPSON RD	North				X		Not NRE
Cicero	7578	TOTMAN RD	North				X		Not NRE
Cicero	7604	TOTMAN RD	North			X			Not NRE
Cicero	5866	TULLER RD	North			X			Not NRE
Cicero	5882	TULLER RD	North			X			Not NRE
Cicero	5888	TULLER RD	North			X			Not NRE
Cicero	5894	TULLER RD	North			X			Not NRE
Cicero	5900	TULLER RD	North			X			Not NRE
Cicero	5910	TULLER RD	North				X		Not NRE
Cicero	5922	TULLER RD	North			X			Not NRE
Cicero	5946	TULLER RD	North			X			Not NRE
Dewitt	6232	FLY RD	East				X		Not NRE
Dewitt	6780	MANLIUS CENTER RD	East			X			Not NRE
Dewitt	6801	MANLIUS CENTER RD	East			X			Not NRE
Dewitt	6450	PHEASANT RD	East				X		Not NRE
Dewitt	6451	PHEASANT RD	East				X		Not NRE
Dewitt	6559	PHEASANT RD	East			X			Not NRE
Dewitt	*****	SUBSTATION	East			X			Not NRE
Dewitt	6018	WILBUR RD	East				X		Not NRE
East Syracuse	6773	MANLIUS CENTER RD	East			X			Not NRE
North Syracuse	154	SLINDES WOODS CIR	North			X			Not NRE
North Syracuse	156	SLINDES WOODS CIR	North			X			Not NRE
North Syracuse	158	SLINDES WOODS CIR	North			X			Not NRE
Syracuse	701-809	ADAMS ST E & ALMOND ST &	Viaduct				X		Not NRE
Syracuse	507-23	ADAMS ST E & TOWNSEND ST	Viaduct				X		Not NRE
Syracuse	701-809	ADAMS ST E REAR	Viaduct				X		Not NRE
Syracuse	525-619	ADAMS ST E TO HARRISON ST	Viaduct				X		Not NRE

Syracuse	238	AINSLEY DR REAR	South				X		Not NRE
Syracuse	915	ALMOND ST	Viaduct			X			Not NRE
Syracuse	1207-11	ALMOND ST	Viaduct	Not Eligible (6740.003975)					Not NRE
Syracuse	601-07	ALMOND ST & CEDAR ST TO I	Viaduct			X			Not NRE
Syracuse	701-57	ALMOND ST & MADISON ST TO	Viaduct			X			Not NRE
Syracuse	1001	ALMOND ST & MONROE ST & R	Viaduct				X		Not NRE
Syracuse	145	ARSENAL DR REAR/ Onondaga Hollow Bur	South		The cemetery is eligible for the National Register of Historic Places under Criterion A as a burial ground associated with the early hamlet of Onondaga Hollow which serves as a final resting place for some of the area's earliest settlers. It is also eligible under Criterion C for its early vernacular funerary art, including the 1812 gravestone of Eunis Gage with its variation on the willow and urn motif (Letter ID A).			X	NRE
Syracuse	111	ASH ST	Viaduct				X		Not NRE
Syracuse	103	ASH ST & STATE ST N	Viaduct				X		Not NRE
Syracuse	210	BASIN ST	Viaduct				X		Not NRE
Syracuse	212	BASIN ST	Viaduct	Not Eligible (6740.008262)					Not NRE
Syracuse	216	BASIN ST	Viaduct	Not Eligible (6740.004809)					Not NRE
Syracuse	304	BASIN ST	Viaduct				X		Not NRE
Syracuse	306	BASIN ST	Viaduct	Not Eligible (6740.003346)					Not NRE
Syracuse	316	BASIN ST	Viaduct			X			Not NRE
Syracuse	318	BASIN ST	Viaduct				X		Not NRE
Syracuse	320	BASIN ST	Viaduct				X		Not NRE
Syracuse	204	BEECH ST N	Viaduct	Not Eligible (6740.013773)					Not NRE
Syracuse	207	BEECH ST N	Viaduct	Not Eligible (6740.013832)					Not NRE
Syracuse	102-08	BEECH ST N & CANAL ST	Viaduct				X		Not NRE
Syracuse	103	BEECH ST N TO CANAL ST	Viaduct				X		Not NRE
Syracuse	200-04	BELDEN AVE E	Viaduct	NR-eligible (within the North Salina Street HD 2016 Expansion)				NRE	NRE
Syracuse	804	BELDEN AVE W	Viaduct				X		*NRE
Syracuse	806	BELDEN AVE W	Viaduct	Not Eligible (6740.008645)					Not NRE
Syracuse	808	BELDEN AVE W	Viaduct	Not Eligible (6740.013605)					Not NRE
Syracuse	629-31	BELDEN AVE W	Viaduct				X		Not NRE
Syracuse	701-09	BELDEN AVE W	Viaduct				X		Not NRE
Syracuse	814-16	BELDEN AVE W	Viaduct			X			Not NRE

Syracuse	820-26	BELDEN AVE W	Viaduct			X			Not NRE
Syracuse	802	BELDEN AVE W & LEAVENWORT	Viaduct	Not Eligible (6740.010012)					Not NRE
Syracuse	706-08	BELDEN AVE W & LEAVENWORT	Viaduct				X		Not NRE
Syracuse	702-04	BELDEN AVE W & MALTBIIE ST	Viaduct				X		Not NRE
Syracuse	600	BRIGHTON AVE E	South				X		Not NRE
Syracuse	821	BRIGHTON AVE E	South	Not Eligible (6740.00467)					Not NRE
Syracuse	890	BRIGHTON AVE E	South			X			Not NRE
Syracuse	125	BURNET AVE	Viaduct	Not Eligible (6740.000256)					Not NRE
Syracuse	205	BURNET AVE	Viaduct				X		Not NRE
Syracuse	207	BURNET AVE	Viaduct				X		Not NRE
Syracuse	210	BURNET AVE	Viaduct				X		*NRE
Syracuse	212	BURNET AVE	Viaduct				X		*NRE
Syracuse	215	BURNET AVE	Viaduct				X		Not NRE
Syracuse	305	BURNET AVE	Viaduct				X		Not NRE
Syracuse	306	BURNET AVE	Viaduct			X			Not NRE
Syracuse	307	BURNET AVE	Viaduct				X		Not NRE
Syracuse	308	BURNET AVE	Viaduct				X		Not NRE
Syracuse	312	BURNET AVE	Viaduct				X		Not NRE
Syracuse	314	BURNET AVE	Viaduct		314 Burnet Avenue is eligible for the National Register under Criteria A and C as an intact example of an Italianate-style rowhouse serving working-class residents of downtown Syracuse in the late 19th and early 20th century (Letter ID D).			X	NRE
Syracuse	316	BURNET AVE	Viaduct				X		*NRE
Syracuse	319	BURNET AVE	Viaduct	Not Eligible (6740.007283)					Not NRE
Syracuse	320	BURNET AVE	Viaduct				X		Not NRE
Syracuse	429	BURNET AVE	Viaduct				X		Not NRE
Syracuse	435	BURNET AVE	Viaduct				X		Not NRE
Syracuse	437	BURNET AVE	Viaduct	Not Eligible (6740.0072)					Not NRE
Syracuse	443	BURNET AVE	Viaduct				X		Not NRE
Syracuse	507	BURNET AVE	Viaduct				X		Not NRE
Syracuse	509	BURNET AVE	Viaduct				X		Not NRE
Syracuse	511	BURNET AVE	Viaduct	Not Eligible (6740.006103)					Not NRE
Syracuse	517	BURNET AVE	Viaduct				X		Not NRE
Syracuse	525	BURNET AVE	Viaduct				X		Not NRE

Syracuse	527	BURNET AVE	Viaduct				X		Not NRE
Syracuse	529	BURNET AVE	Viaduct				X		Not NRE
Syracuse	604	BURNET AVE	Viaduct	Not Eligible (6740.010808)					Not NRE
Syracuse	605	BURNET AVE	Viaduct				X		Not NRE
Syracuse	606	BURNET AVE	Viaduct	Not Eligible (6740.005458)					Not NRE
Syracuse	607	BURNET AVE	Viaduct			X			Not NRE
Syracuse	608	BURNET AVE	Viaduct				X		Not NRE
Syracuse	616	BURNET AVE	Viaduct				X		Not NRE
Syracuse	625	BURNET AVE	Viaduct				X		Not NRE
Syracuse	642	BURNET AVE	Viaduct				X		Not NRE
Syracuse	646	BURNET AVE	Viaduct				X		Not NRE
Syracuse	648	BURNET AVE	Viaduct				X		Not NRE
Syracuse	111-15	BURNET AVE	Viaduct		The single building at 111-115 Burnet Avenue is composed of three residences. It is eligible for the National Register under Criteria A and C, as an intact row of connected Italianate-style residences serving working-class residents of downtown Syracuse (Letter ID B).			X	NRE
Syracuse	309-13	BURNET AVE	Viaduct				X		Not NRE
Syracuse	315-17	BURNET AVE	Viaduct				X		Not NRE
Syracuse	405-09	BURNET AVE	Viaduct				X		Not NRE
Syracuse	411-13	BURNET AVE	Viaduct				X		Not NRE
Syracuse	417-21	BURNET AVE	Viaduct				X		Not NRE
Syracuse	425-27	BURNET AVE	Viaduct				X		Not NRE
Syracuse	431-33	BURNET AVE	Viaduct				X		Not NRE
Syracuse	503-05	BURNET AVE	Viaduct				X		Not NRE
Syracuse	513-15	BURNET AVE	Viaduct				X		Not NRE
Syracuse	519-23	BURNET AVE	Viaduct			X			Not NRE
Syracuse	531-35	BURNET AVE	Viaduct				X		Not NRE
Syracuse	610-14	BURNET AVE	Viaduct				X		Not NRE
Syracuse	632-40	BURNET AVE	Viaduct				X		Not NRE
Syracuse	658-60	BURNET AVE	Viaduct				X		Not NRE
Syracuse	808-22	BURNET AVE	Viaduct				X		Not NRE
Syracuse	834	BURNET AVE & BEECH ST N	Viaduct				X		Not NRE
Syracuse	824-28	BURNET AVE & BEECH ST N	Viaduct	Not Eligible (6740.013829)					Not NRE
Syracuse	323	BURNET AVE & CATHERINE ST	Viaduct				X		Not NRE
Syracuse	322-24	BURNET AVE & CATHERINE ST	Viaduct				X		Not NRE



Syracuse	400	BURNET AVE & CATHERINE ST/ New York	Viaduct	NR-listed (94NR00743)				NRL	NRL
Syracuse	600	BURNET AVE & CROUSE AVE N	Viaduct				X		Not NRE
Syracuse	546-48	BURNET AVE & CROUSE AVE N	Viaduct				X		Not NRE
Syracuse	547-49	BURNET AVE & CROUSE AVE N	Viaduct				X		Not NRE
Syracuse	122-24	BURNET AVE & DECKER ST/ Brayton- Folk	Viaduct	NR-eligible (06740.000261)	The Cabinet Fabrication Group property located at 122-124 Burnet Avenue was constructed between 1864 and 1940s. The complex is eligible under Criterion A and C; the 1940s cinder block addition is not considered eligible for the NR. (Building 3)			NRE	NRE
Syracuse	734	BURNET AVE & ELM ST TO LO	Viaduct			X			Not NRE
Syracuse	501	BURNET AVE & HOWARD ST	Viaduct				X		Not NRE
Syracuse	467-71	BURNET AVE & HOWARD ST	Viaduct				X		Not NRE
Syracuse	664-66	BURNET AVE & LODI ST	Viaduct				X		Not NRE
Syracuse	219	BURNET AVE & MCBRIDE ST Dollard House	Viaduct		The Edmund Dollard House at 219 Burnet Avenue is eligible for the National Register under Criterion C as a relatively intact example of Second Empire-style domestic architecture in downtown Syracuse (Letter ID E).			X	NRE
Syracuse	216	BURNET AVE & MCBRIDE ST N	Viaduct				X		Not NRE
Syracuse	300	BURNET AVE & MCBRIDE ST N	Viaduct			X			Not NRE
Syracuse	301-03	BURNET AVE & MCBRIDE ST N	Viaduct				X		Not NRE
Syracuse	200	BURNET AVE & TOWNSEND ST/ Lammert H	Viaduct		The Lammert House at 200 Burnet Avenue is eligible for the National Register of Historic Places under Criteria A and C as a relatively intact example of Italianate-style residential architecture associated with the Lammert family and other middle-class working families in late 19 <sup>th</sup> and early 20 <sup>th</sup> century downtown Syracuse (Letter ID F).			X	NRE
Syracuse	132	BURNET AVE TO BROWN ST	Viaduct				X		Not NRE
Syracuse	204	BURNET AVE/ Corner Block Factory Shop/ T	Viaduct	NR-eligible (06740.000385)	The Syracuse Corner Block Company factory is a three-story red brick factory located at 204 Burnet Avenue and constructed in 1895. The factory is significant under Criterion C for its associated with the Industrial Boom and Diversification period. (Building 2)			NRE	NRE
Syracuse	211	BURNET AVE/ Doll House	Viaduct		211 Burnet Avenue, the Doll House, is eligible for the National Register under Criterion C as a relatively intact example of transitional Italianate-Neo Grec-style middle-class domestic architecture (Letter ID C).			X	NRE
Syracuse	112-16	BURNET AVE/ Michael Dolpin Building/ Bar	Viaduct	NR-eligible (06740.000260)	The Michael Dolpin Rowhouse, located at 112-116 Burnet Avenue is a two-story Italianate brick building constructed in 1872. The house is eligible under Criterion C as a rare surviving example of an unaltered Victorian rowhouse. (Building 1)			NRE	NRE
Syracuse	516	BURT ST	Viaduct	Not Eligible (6740.004479)					Not NRE
Syracuse	507	BURT ST TO MCBRIDE ST S	Viaduct				X		Not NRE

Syracuse	512	BURT ST TO VANBUREN ST	Viaduct	Not Eligible (6740.003044)					Not NRE
Syracuse	204	BUTTERNUT ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	206	BUTTERNUT ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	117	BUTTERNUT ST & SALT ST	Viaduct			X			Not NRE
Syracuse	117	BUTTERNUT ST & SALT ST/ Veterans Fastener Supply Corp	Viaduct		The Veteran's Fastener Supply Corp building meets National Register of Historic Places Criteria A and C as a relatively intact circa 1927 Neoclassical-style municipal building constructed by the City of Syracuse to house a City meat inspection facility as a response to health concerns related to the industry, which was a regionally important economic engine. The building also housed a municipal archery facility, and later served as the Syracuse Transportation Department's offices (Letter ID G).			X	NRE
Syracuse	903-35	CANAL ST	Viaduct				X		Not NRE
Syracuse	790	CANAL ST & WALNUT AVE	Viaduct				X		Not NRE
Syracuse	110	CATAWBA ST & LOCK ALY	Viaduct	Not Eligible (6740.006107)					Not NRE
Syracuse	204	CATHERINE ST	Viaduct				X		Not NRE
Syracuse	206	CATHERINE ST	Viaduct				X		Not NRE
Syracuse	202	CATHERINE ST & BURNET AVE	Viaduct				X		Not NRE
Syracuse	998	CLINTON ST N	Viaduct			X			Not NRE
Syracuse	207-11	CLINTON ST N	Viaduct	Not Eligible (6740.011671)					Not NRE
Syracuse	221-23	CLINTON ST N	Viaduct	Not Eligible (6740.010502)					Not NRE
Syracuse	901	CLINTON ST N & COURT ST W	Viaduct	Not Eligible (6740.003729)					Not NRE
Syracuse	669-81	CLINTON ST N & DIVISION S	Viaduct			X			Not NRE
Syracuse	717	CLINTON ST N & DIVISION S Simonds Building	Viaduct	NR-eligible (06740.001458)	The Elgin A. Simonds Company Building located at 212 West Division Street and was constructed ca. 1908 and is eligible under Criterion C as a significant example of early twentieth century industrial/manufacturing architecture. (Building 7)			NRE	NRE
Syracuse	101	CLINTON ST N & GENESEE ST/ Syracuse Post Office	Viaduct	<b>NR-listed (91NR00249)</b>	The Syracuse Post Office and Courthouse is a Neo-Classical style building constructed between 1926 and 1928 located at 101 North Clinton Street. It is significant under Criterion C as an outstanding example of monumental twentieth century architectural design. (Building 8)			NRL	NRL
Syracuse	321-27	CLINTON ST N & HERALD PL	Viaduct				X		Not NRE
Syracuse	800	CLINTON ST N & SPENCER ST	Viaduct	(previously NRE, now demolished)		X			Demolished

Syracuse	706-16	CLINTON ST N & SPENCER ST	Viaduct				X		Not NRE
Syracuse	233	CLINTON ST N & WILLOW ST	Viaduct				X		Not NRE
Syracuse	721	CLINTON ST N & SPENCER ST/ FormerButle	Viaduct	06740.001456 (previously NRE, now demolished)		X			Demolished
Syracuse	936	CLINTON ST N TO OSWEGO BL	Viaduct				X		Not NRE
Syracuse	1000	CLINTON ST N TO OSWEGO BL	Viaduct			X			Not NRE
Syracuse	667	CLINTON ST N/ Amphion Piano Player Build	Viaduct	NR-eligible (06740.001455)	The Amphion Piano Player Building is a two- and three-story building eligible under Criterion C as a significant example of early twentieth century industrial/manufacturing architecture. (Building 5)			NRE	NRE
Syracuse	315	CLINTON ST N/ Residence (Paul Cowley & A	Viaduct	NR-eligible (06740.001406)	The two-story, Queen Anne style residence at 315 North Clinton Street was constructed in 1880 and is eligible under Criterion C as an intact example of a late nineteenth century Queen Anne Style residence. (Building 4)			NRE	NRE
Syracuse	100-34	CLINTON ST S & WASHINGTON	Viaduct	Not Eligible (6740.00309)					Not NRE
Syracuse	940	COMSTOCK AVE & COLVIN ST/ Oakwood	Viaduct	<b>NR-Listed (90NR03310)</b>	The Oakwood Cemetery (1859-1940) was determined eligible under Criterion C for its landscape architecture, art, and funerary architecture. Originally designed by Howard Daniels, the entire site encompasses approximately 160 acres with 86 contributing elements. Monuments and mausoleums represent a variety of architectural styles including Gothic Revival, Baroque, Romanesque, Egyptian Revival, Classical Revival, Neoclassical, and Art Deco. (Building 8)			NRL	NRL
Syracuse	151-59	COURT ST	Viaduct				X		Not NRE
Syracuse	146	COURT ST & SUNSET AVE	Viaduct				X		Not NRE
Syracuse	147	COURT ST & SUNSET AVE	Viaduct				X		Not NRE
Syracuse	100	COURT ST W & CLINTON ST N	Viaduct				X		Not NRE
Syracuse	206	CROUSE AVE N	Viaduct				X		Not NRE
Syracuse	207-09	CROUSE AVE N	Viaduct	Not Eligible (6740.000859)					Not NRE
Syracuse	309	CROUSE AVE S	Viaduct				X		Not NRE
Syracuse	313-23	CROUSE AVE S	Viaduct				X		Not NRE
Syracuse	410-18	CROUSE AVE S	Viaduct		410-418 South Crouse Avenue, a late 19th century residential row located on the west side of South Crouse Avenue exists in a heavily altered context that includes institutional and commercial buildings and associated parking, and is a surviving remnant of Syracuse's late 19th century residential fabric on South Crouse Avenue. The row is eligible for the National Register under Criterion C as row of late 19th century residential buildings (Letter ID H).			X	NRE
Syracuse	704	CROUSE AVE S & ADAMS ST E	Viaduct			X			Not NRE
Syracuse	637-49	CROUSE AVE S & ADAMS ST E	Viaduct			X			Not NRE

Syracuse	701-05	CROUSE AVE S & ADAMS ST E	Viaduct				X		Not NRE
Syracuse	601-15	CROUSE AVE S & HARRISON S/ 601 South	Viaduct	NR-eligible (06740.004699)	The former Temple Adath Yeshurun is eligible under Criterion C as an example of Neo-Classical architecture. The former synagogue, located at 610-15 South Crouse Avenue, was built in 1921. (Building 9)			NRE	NRE
Syracuse	501-15	CROUSE AVE S & MADISON ST	Viaduct			X			Not NRE
Syracuse	310	CROUSE AVE S TO IRVING AV	Viaduct				X		Not NRE
Syracuse	205	DANFORTH ST	Viaduct				X		Not NRE
Syracuse	201	DANFORTH ST & SUNSET AVE	Viaduct				X		Not NRE
Syracuse	215-21	DIVISION ST W	Viaduct	Not Eligible (6740.00414)					Not NRE
Syracuse	102	DIVISION ST W & CLINTON S/ Oak Knitting	Viaduct	NR-eligible (06740.001306)	The Oak Knitting Company Mill Building located at 102 West Division Street is a four-story industrial building constructed in 1899. It is eligible under Criteria B and C as an example of early 20th century industrial/manufacturing architecture and as an example work of architect Archimedes Russell, a regionally prominent architect. (Building10)			NRE	NRE
Syracuse	1001-03	ERIE BLVD E & CROUSE AVE	Viaduct			X			Not NRE
Syracuse	921-43	ERIE BLVD E & CROUSE AVE	Viaduct			X			Not NRE
Syracuse	910	ERIE BLVD E & FORMAN AVE	Viaduct				X		Not NRE
Syracuse	500	ERIE BLVD E & TOWNSEND ST/ Smith Res	Viaduct	NR-eligible (06740.000636)	The Smith Restaurant Supply Building located at 500 Erie Boulevard East was constructed in 1876. It is eligible under Criteria A and C as one of the few canal-era manufacturing/warehousing buildings remaining in downtown Syracuse and as the oldest surviving building of any type in the Central Business District. (Building 12)			NRE	NRE
Syracuse	1043-51	ERIE BLVD E & UNIVERSITY	Viaduct			X			Not NRE
Syracuse	1101-43	ERIE BLVD E & UNIVERSITY	Viaduct			X			Not NRE
Syracuse	1145-53	ERIE BLVD E & WALNUT AVE	Viaduct				X		Not NRE
Syracuse	330	ERIE BLVD E / Strempel's Locksmiths	Viaduct	NR-eligible (within the Hanover Square Historic District) (06740.000632)				NRE	NRE
Syracuse	1215-25	ERIE BLVD E TO CANAL ST	Viaduct				X		Not NRE
Syracuse	911	ERIE BLVD E TO CANAL ST &	Viaduct				X		Not NRE
Syracuse	1231	ERIE BLVD E TO LODI ST &	Viaduct			X			Not NRE
Syracuse	740	ERIE BLVD E TO WATER ST E/ Terminal Bu	Viaduct	NR-eligible (6740.011626)	The Terminal Building Warehouse is an eight-story brick warehouse located at 740 East Erie Boulevard constructed in 1930. The warehouse is associated with the industrial and commercial growth of the city during the Depression Era (1930-1941) and is significant under Criteria A and C. (Building 13)			NRE	NRE

Syracuse	815	ERIE BLVD E/ New York Central Railroad Pa	Viaduct	NR-listed (94NR00743)	The New York Central Railroad Passenger and Freight Station located at 815 Erie Boulevard East and 400 Burnet Avenue was designed by J.P. Gallagher and constructed ca. 1934. It is eligible under Criteria A and C for its place in the history of railroads in Syracuse, and as an outstanding example of the Art Deco style. (Building 11)			NRL	NRL
Syracuse	711-21	ERIE BLVD E/ New York Central Railroad Pa	Viaduct	NR-listed (94NR00743)	The New York Central Railroad Passenger and Freight Station located at 815 Erie Boulevard East and 400 Burnet Avenue was designed by J.P. Gallagher and constructed ca. 1934. It is eligible under Criteria A and C for its place in the history of railroads in Syracuse, and as an outstanding example of the Art Deco style. (Building 11)			NRL	NRL
Syracuse	1207-13	ERIE BLVD TO CANAL ST	Viaduct				X		Not NRE
Syracuse	400-30	ERIE BLVD W & PLUM ST & T	Viaduct				X		Not NRE
Syracuse	300-20	ERIE BLVD W/ The Niagara Hudson Building	Viaduct	NR-listed (09NR06067)	The Niagara Hudson Building consists of two adjoined structures located at 300-320 West Erie Boulevard constructed between 1930 and 1932 in the Art Deco and Art Modern styles. The buildings are significant under Criterion A, as a symbol of the Age of Electricity, and Criterion C, as an outstanding example of Art Deco architecture. (Building 14)			NRL	NRL
Syracuse	144	EVANS ST	Viaduct				X		Not NRE
Syracuse	447	FAYETTE ST E	Viaduct	Not Eligible (6740.000625)					Not NRE
Syracuse	507	FAYETTE ST E	Viaduct			X			Not NRE
Syracuse	603	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	705	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	713	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	1014-16	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	1031-35	FAYETTE ST E	Viaduct			X			Not NRE
Syracuse	501-05	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	511-15	FAYETTE ST E	Viaduct			X			Not NRE
Syracuse	712-14	FAYETTE ST E	Viaduct			X			Not NRE
Syracuse	725-27	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	801-49	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	900-16	FAYETTE ST E	Viaduct				X		Not NRE
Syracuse	701-03	FAYETTE ST E & ALMOND ST	Viaduct				X		Not NRE
Syracuse	1001	FAYETTE ST E & CROUSE AVE	Viaduct				X		Not NRE

Syracuse	938	FAYETTE ST E & CROUSE AVE/ The Sylvester Apartment	Viaduct	NR-eligible (6740.013452)	The Sylvester Apartment building at 900 East Fayette Street was constructed in the first decades of the 20th century and designed by Charles Erastus Colton. It is eligible under Criteria A, for its association with the Progressive Era, and Criterion C, as an example of an early twentieth century apartment building. (Building 16)			NRE	NRE
Syracuse	711	FAYETTE ST E/ People's African Methodist Zion Church	Viaduct	NR-listed (11NR06227)	The People's African Methodist Episcopal (AME) Zion Church located at 711 East Fayette Street is a Gothic Revival style church constructed in 1910-11. The building is eligible under Criteria A and C as the oldest standing African American church in the City of Syracuse. (Building 15)			NRL	NRL
Syracuse	382-88	FAYETTE ST W	Viaduct				X		Not NRE
Syracuse	319	FILLMORE AVE	South	Not Eligible (072.-08-10.0)					Not NRE
Syracuse	325	FILLMORE AVE	South				X		Not NRE
Syracuse	312	FILLMORE AVE/ The Heritage at Loretto	South		The Loretto Rest Roman Catholic Home for the Aged, built in 1926, is located at 312 Fillmore Avenue (also using the address 750 East Brighton Avenue). It is significant under Criterion A for its association with the social trends of elder care across the country during this time. In addition, it is significant under Criterion C as an intact example of a Neoclassical style institutional building (Letter ID I).			X	NRE
Syracuse	501	FORMAN AVE & GENESEE ST E	Viaduct				X		Not NRE
Syracuse	101	FORMAN AVE REAR	Viaduct				X		Not NRE
Syracuse	212	FRANKLIN ST N	Viaduct	Not Eligible (6740.001215)					Not NRE
Syracuse	214	FRANKLIN ST N	Viaduct				X		Not NRE
Syracuse	418	FRANKLIN ST N	Viaduct				X		Not NRE
Syracuse	428	FRANKLIN ST N	Viaduct				X		Not NRE
Syracuse	460	FRANKLIN ST N	Viaduct			X			Not NRE
Syracuse	420-24	FRANKLIN ST N	Viaduct			X			Not NRE
Syracuse	438-46	FRANKLIN ST N & GENANT DR/ 446 North Franklin	Viaduct	NR-eligible (06740.011640)	The one-story brick warehouse was determined eligible for the NR under Criterion C, as a significant example of early twentieth century industrial/manufacturing architecture in upstate New York. (Building 17)			NRE	NRE
Syracuse	501	FRANKLIN ST N & PLUM ST	Viaduct				X		Not NRE
Syracuse	455	FRANKLIN ST N & PLUM ST/ Regal Textile	Viaduct	NR-eligible (06740.001461)	The Regal Textile Company Building at 455 North Franklin Street was constructed ca. 1904 and designed by James Randall & Asa Merrick. It is eligible under Criterion C as a significant example of early twentieth century industrial/manufacturing architecture. (Building 19)			NRE	NRE

Syracuse	432	FRANKLIN ST N TO CLINTON/ C.C. Bradley	Viaduct	NR-eligible (06740.001460)	The C.C. Bradley Plant Building at 432 North Franklin Street was constructed in 1903. It is eligible under Criterion C as a significant example of early twentieth century industrial/manufacturing architecture. (Building 20)			NRE	NRE
Syracuse	600	FRANKLIN ST N TO SOLAR ST	Viaduct				X		Not NRE
Syracuse	429	FRANKLIN ST N/ Remington Monarch Typew	Viaduct	NR-eligible (06740.001213)	The Remington (Monarch) Typewriter Company Building at 429 North Franklin Street was constructed ca. 1903. It is eligible under Criterion C, as a significant example of early twentieth century industrial/manufacturing architecture. (Building 18)			NRE	NRE
Syracuse	127	GARFIELD AVE	Viaduct	Not eligible (6740.011172)					Not NRE
Syracuse	205	GARFIELD AVE	Viaduct				X		Not NRE
Syracuse	221	GARFIELD AVE	Viaduct	Not eligible (6740.01072)					Not NRE
Syracuse	207-09	GARFIELD AVE	Viaduct	Not eligible (6740.011597)					Not NRE
Syracuse	211-17	GARFIELD AVE	Viaduct	Not eligible (6740.00377)					Not NRE
Syracuse	131	GARFIELD AVE & WOODLAND	Viaduct				X		Not NRE
Syracuse	201	GARFIELD AVE & WOODLAND A	Viaduct	Not eligible (6740.004411)					Not NRE
Syracuse	215	GENANT DR	Viaduct				X		Not NRE
Syracuse	647	GENANT DR & CLINTON ST N	Viaduct				X		Not NRE
Syracuse	651	GENANT DR & CLINTON ST N	Viaduct			X			Not NRE
Syracuse	431	GENANT DR & DIVISION ST W	Viaduct			X			Not NRE
Syracuse	311	GENANT DR TO CLINTON ST N/ Syracuse L	Viaduct	NR-eligible (06740.001463)	The Syracuse Lighting Company Building at 311 Genant Street was constructed in 1911. It is eligible under Criteria B and C as the only remaining intact structure representing upstate New York utility services in the 20th century. (Building 21)			NRE	NRE
Syracuse	118	GENESEE ST E	Viaduct	NR-eligible (within the Hanover Square Historic District)				NRE	NRE
Syracuse	140	GENESEE ST E	Viaduct	NR-eligible (within the Hanover Square Historic District)				NRE	NRE
Syracuse	225	GENESEE ST E	Viaduct	<b>NR-listed (Non-Contributing within the Hanover Square Historic District 2014 Expansion)</b>				NRL N/C	NRL N/C
Syracuse	550	GENESEE ST E	Viaduct			X			Not NRE
Syracuse	600	GENESEE ST E	Viaduct			X			Not NRE
Syracuse	711	GENESEE ST E	Viaduct				X		Not NRE
Syracuse	818	GENESEE ST E	Viaduct				X		Not NRE

Syracuse	907	GENESEE ST E	Viaduct				X		Not NRE
Syracuse	713-15	GENESEE ST E	Viaduct		713-715 Genesee Street East, now the Parkview Hotel, is a six-story, 14-bay wide Renaissance Revival-style building. It was constructed circa 1928 as a Medical Arts Building, designed by Wolfe Markham (Letter ID J).			X	NRE
Syracuse	701-05	GENESEE ST E & ALMOND ST	Viaduct	Not Eligible (6740.00412)					Not NRE
Syracuse	1000	GENESEE ST E & CROUSE AVE	Viaduct			X			Not NRE
Syracuse	1001-19	GENESEE ST E & CROUSE AVE	Viaduct				X		Not NRE
Syracuse	941-49	GENESEE ST E & CROUSE AVE	Viaduct	Not Eligible (6740.012948)					Not NRE
Syracuse	721	GENESEE ST E & FORMAN AVE	Viaduct			X			Not NRE
Syracuse	728	GENESEE ST E & FORMAN AVE	Viaduct		Now the Syracuse Federal Credit Union, the former First Church of Christ Scientist is located at 728 East Genesee Street. The property includes a main building with rotunda, built in 1923; and a smaller Neoclassical building added in 1949 (Letter ID K).			X	NRE
Syracuse	801	GENESEE ST E & FORMAN AVE	Viaduct				X		Not NRE
Syracuse	900	GENESEE ST E & IRVING AVE	Viaduct				X		Not NRE
Syracuse	820-24	GENESEE ST E & IRVING AVE	Viaduct	Not Eligible (6740.008658)					Not NRE
Syracuse	827-33	GENESEE ST E & IRVING AVE	Viaduct	Not Eligible (6740.01255)					Not NRE
Syracuse	901-05	GENESEE ST E & IRVING AVE	Viaduct				X		Not NRE
Syracuse	571-81	GENESEE ST E & MC BRIDE S	Viaduct	Not Eligible (6740.006166)					Not NRE
Syracuse	601	GENESEE ST E & MCBRIDE ST/ Peck Hall/H	Viaduct	NR-eligible (06740.001422)	Peck Hall at University College located at 309 South McBride Street was designed by Albert Brockway of Benson and Brockway and constructed in 1896 in a modified Renaissance style. It is eligible under Criterion A for its association with local medicine and education and under Criterion Cas a fine example of late 19th century Renaissance style architecture. Reid Hall located at 610 East Fayette Street was constructed in 1914 in the Neoclassical style. It is eligible under Criterion A for its association with local medicine and education and under Criterion C as an intact example of early 20th century Neoclassical architecture. (Building 22)			NRE	NRE
Syracuse	201-19	GENESEE ST E & WARREN ST	Viaduct	NR-eligible (within the Hanover Square Historic District)				NRE	NRE
Syracuse	800-14	GENESEE ST E TO CEDAR ST	Viaduct	Not Eligible (6740.012381)					Not NRE
Syracuse	555	GENESEE ST E TO FAYETTE S	Viaduct			X			Not NRE
Syracuse	709	GENESEE ST E TO FAYETTE S	Viaduct	Not Eligible (6740.005263)					Not NRE
Syracuse	825	GENESEE ST E TO IRVING AV	Viaduct				X		Not NRE
Syracuse	717	GENESEE ST E TO ORANGE AL	Viaduct				X		Not NRE



Syracuse	719	GENESEE ST E TO ORANGE AL/ National	Viaduct	NR-eligible (06740. 001212)	The National Casket Company building constructed in the early 20th century in the Art Deco style is eligible under Criterion C for its architectural design. (Building 24)			NRE	NRE
Syracuse	522	GENESEE ST E TO TOWNSEND	Viaduct			X			Not NRE
Syracuse	811	GENESEE ST E TO WELLINGTO	Viaduct				X		Not NRE
Syracuse	815	GENESEE ST E TO WELLINGTO	Viaduct				X		Not NRE
Syracuse	817	GENESEE ST E TO WELLINGTO	Viaduct				X		Not NRE
Syracuse	805-09	GENESEE ST E TO WELLINGTO	Viaduct				X		Not NRE
Syracuse	237-43	GENESEE ST E/ Courier Building	Viaduct	<b>NR-listed (Individually) and NR-eligible (Contributing to the Hanover Square Historic District 2014 Expansion)</b>	The Courier Building at 237-43 East Genesee Street was built in 1844 in the Greek Revival style and updated in 1918 with Chicago Commercial style design elements. It is eligible under Criterion A and C for its association with events that galvanizing opposition to slavery in Central New York and as an early surviving building. (Building 23)			NRL	NRL
Syracuse	128	GENESEE ST E/ Franklin Building	Viaduct	<b>NR-listed (Contributing to the Hanover Square Historic District)</b>				NRL	NRL
Syracuse	132	GENESEE ST E/ Franklin Building	Viaduct	<b>NR-listed (Contributing to the Hanover Square Historic District)</b>				NRL	NRL
Syracuse	122-26	GENESEE ST E/ Franklin Building	Viaduct	<b>NR-listed (Contributing to the Hanover Square Historic District)</b>				NRL	NRL
Syracuse	134-36	GENESEE ST E/ Franklin Building (134) Pos	Viaduct	<b>NR-listed (Contributing to the Hanover Square Historic District)</b>				NRL	NRL
Syracuse	200	GENESEE ST E/ Granger Block	Viaduct	<b>NR-listed (Contributing to the Hanover Square Historic District) (06740. 013179)</b>				NRL	NRL
Syracuse	514	GENESEE ST W	Viaduct				X		Not NRE
Syracuse	615	GENESEE ST W	Viaduct			X			Not NRE
Syracuse	617	GENESEE ST W	Viaduct				X		Not NRE
Syracuse	627	GENESEE ST W	Viaduct				X		Not NRE
Syracuse	208-12	GENESEE ST W	Viaduct				X		Not NRE
Syracuse	234-44	GENESEE ST W	Viaduct			X			Not NRE
Syracuse	252-58	GENESEE ST W	Viaduct				X		Not NRE
Syracuse	260-64	GENESEE ST W & FRANKLIN S	Viaduct				X		Not NRE

Syracuse	523	GENESEE ST W & PLUM ST	Viaduct				X		Not NRE
Syracuse	524	GENESEE ST W & PLUM ST	Viaduct				X		Not NRE
Syracuse	600-08	GENESEE ST W & PLUM ST	Viaduct	Not Eligible (6740.004555)					Not NRE
Syracuse	400	GENESEE ST W & WALLACE ST/ Engine Co	Viaduct	NR-eligible (06740.001415)	The Engine Company #12 Fire Station located at 400 West Genesee Street was constructed in 1923 in the Colonial Revival architecture. It is eligible under Criterion C as a significant example of early twentieth century architecture and as one of two remaining historic fire stations in downtown Syracuse. (Building 25)			NRE	NRE
Syracuse	501	GENESEE ST W & WEST ST N	Viaduct				X		Not NRE
Syracuse	500-08	GENESEE ST W & WEST ST N	Viaduct				X		Not NRE
Syracuse	344	GENESEE ST W & WILLOW ST	Viaduct				X		Not NRE
Syracuse	621	GENESEE ST W REAR	Viaduct			X			Not NRE
Syracuse	638	GENESEE ST W TO BELDEN AV	Viaduct				X		Not NRE
Syracuse	620	GENESEE ST W TO BELDEN AV/ First Pres	Viaduct		The First Presbyterian Church, at 620-622 West Genesee Street, was designed by Tracy and Swartwout of New York in 1904. The Parish House associated with the First Presbyterian Church was originally built as an Italianate-style residence circa 186. It is significant under Criteria A and C (Letter ID L).			X	NRE
Syracuse	216-18	GENESEE ST W TO CLINTON S	Viaduct				X		Not NRE
Syracuse	226-30	GENESEE ST W TO CLINTON S/ FOE #53	Viaduct	NR-eligible (06740.000685)	The F.O.E. #53 building at 220-226 West Genesee Street was constructed in 1924 in the Georgian Revival style. It is eligible under Criterion C as an important example of Georgian Revival commercial architecture. (Building 26)			NRE	NRE
Syracuse	409	GENESEE ST W TO CRK	Viaduct				X		Not NRE
Syracuse	605	GENESEE ST W TO PLUM ST	Viaduct			X			Not NRE
Syracuse	308	GENESEE ST W TO WILLOW ST	Viaduct		The Byrne Block, which occupies a triangular-shaped parcel formed by North Franklin Street, West Genesee Street, and West Willow Street, is a terra cotta-clad Beaux-Arts-style building was the birthplace and one-time headquarters of Byrne Dairy. It is significant under Criteria A and C (Letter ID M).			X	NRE
Syracuse	248-50	GENESEE ST W TO WILLOW ST	Viaduct				X		Not NRE
Syracuse	413	GLEN AVE E	South			X			Not NRE
Syracuse	763-97	HARRISON ST & IRVING AVE	Viaduct			X			Not NRE
Syracuse	725	HARRISON ST & MADISON ST/ Washington	Viaduct	NR-eligible (06740.006714)	The Washington Irving School located at 725 Harrison Street was constructed in 1926 in the Georgian Revival style. It is eligible under Criteria A for its association with educational facilities and under Criterion C as an example of a large Georgian Revival style neighborhood school. (Building 27)			NRE	NRE
Syracuse	513-27	HARRISON ST & TOWNSEND ST	Viaduct			X			Not NRE

Syracuse	235	HARRISON ST & WARREN ST S	Viaduct			X			Not NRE
Syracuse	207-11	HERALD PL	Viaduct				X		Not NRE
Syracuse	213-19	HERALD PL	Viaduct				X		Not NRE
Syracuse	221-23	HERALD PL & FRANKLIN ST N	Viaduct				X		Not NRE
Syracuse	212	HERALD PL & FRANKLIN ST N/ Syracuse H	Viaduct	NR-eligible (06740.000640)	The Syracuse Herald Building at 220 Herald Place is a Classical Revival style building constructed in 1928. It is eligible under Criteria A and C for its association with the newspaper, The Herald, and as an example of industrial design. (Building 28)			NRE	NRE
Syracuse	205	HICKORY ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	204	HOWARD ST	Viaduct				X		Not NRE
Syracuse	445	IRVING AVE	Viaduct	Not Eligible (6740.013669)					Not NRE
Syracuse	505	IRVING AVE	Viaduct			X			Not NRE
Syracuse	722-48	IRVING AVE	Viaduct	Not Eligible (6740.007113)					Not NRE
Syracuse	701	IRVING AVE & ADAMS ST E	Viaduct			X			Not NRE
Syracuse	601	IRVING AVE & HARRISON ST	Viaduct			X			Not NRE
Syracuse	800	IRVING AVE & VANBUREN ST	Viaduct						No Information
Syracuse	900-06	IRVING AVE & VANBUREN ST	Viaduct			X			Not NRE
Syracuse	603	IRVING AVE TO CROUSE AVE	Viaduct			X			Not NRE
Syracuse	325-27	IRVING AVE TO GENESEE ST	Viaduct				X		Not NRE
Syracuse	310	IRVING AVE TO WELLINGTON	Viaduct				X		Not NRE
Syracuse	108	ISABELLA ST	Viaduct				X		Not NRE
Syracuse	110	ISABELLA ST	Viaduct				X		Not NRE
Syracuse	112	ISABELLA ST	Viaduct				X		Not NRE
Syracuse	423	JAMES ST	Viaduct				X		Not NRE
Syracuse	434	JAMES ST	Viaduct				X		Not NRE
Syracuse	440	JAMES ST	Viaduct	Not Eligible (6740.001298)					Not NRE
Syracuse	457	JAMES ST	Viaduct		The Joseph Newell House located at 457 James Street has undergone alterations, however, it is eligible for the National Register under Criteria A and C as an example of a distinguished Second Empire-style rowhouse that was home to several prominent residents of Syracuse in the late 19th and early 20th centuries (Letter ID P).			X	NRE
Syracuse	121-27	JAMES ST	Viaduct				X		Not NRE
Syracuse	447-53	JAMES ST	Viaduct			X			Not NRE
Syracuse	469-71	JAMES ST	Viaduct				X		Not NRE

Syracuse	477-79	JAMES ST	Viaduct				X		Not NRE
Syracuse	408-22	JAMES ST & BURNET AVE/ The Snowden H	Viaduct	NR-eligible (06740.000251)	The Snowden Hotel was constructed in 1902 by Henry J. Ryan and designed by Archimedes Russell in an eclectic style. It is eligible under Criteria A and C as the only surviving example of an apartment building designed by Russell. (Building 29)			NRE	NRE
Syracuse	407	JAMES ST & STATE ST N	Viaduct			X			Not NRE
Syracuse	323-35	JAMES ST & STATE ST N	Viaduct		The building at 323-325 James Street was originally known as the "Crichton Apartments," or the "Crichton Flats," is eligible for the National Register of Historic Places under Criterion C as a relatively intact example of a Romanesque Revival-style mixed use commercial and apartment building in downtown Syracuse (Letter ID Q).			X	NRE
Syracuse	454	JAMES ST TO BURNET AVE	Viaduct			X			Not NRE
Syracuse	437	JAMES ST/ Church of the Saviour	Viaduct		Church of the Saviour (Saint James Episcopal Church) is eligible for the National Register of Historic Places under Criterion C as a Gothic Revival style church expressing multiple periods of development and reflecting the work of distinguished architects including local Asa L. Merrick and Boston-based Ralph Adams Cram. It is also eligible under Criterion A for its continuous association with one of Syracuse's earliest Episcopal congregations (Letter ID O).			X	NRE
Syracuse	429	JAMES ST/ Norton House	Viaduct		The residence at 427-429 James Street was constructed for John D. Norton in 1842. It is eligible under Criteria A and C as a particularly fine example of high-style Greek Revival domestic architecture in an urban context and for its association with one of Syracuse's most prominent mid-19 <sup>th</sup> century families, the Nortons (Letter ID N).			X	NRE
Syracuse	311	KENNEDY ST E	Viaduct				X		Not NRE
Syracuse	312	KENNEDY ST E	Viaduct				X		Not NRE
Syracuse	100	KIRKPATRICK ST & BASIN ST	Viaduct				X		Not NRE
Syracuse	101	KIRKPATRICK ST & BASIN ST	Viaduct				X		Not NRE
Syracuse	101	KIRKPATRICK ST W & CLINTO	Viaduct				X		Not NRE
Syracuse	256	LAFAYETTE RD	South				X		Not NRE
Syracuse	304	LAFAYETTE RD	South				X		Not NRE
Syracuse	308	LAFAYETTE RD	South				X		Not NRE
Syracuse	452	LAFAYETTE RD	South				X		*NRE
Syracuse	100	LANDMARK PL & TOWNSEND ST	Viaduct			X			Not NRE
Syracuse	104-06	LAUREL ST E & STATE ST N	Viaduct				X		Not NRE
Syracuse	230	LEON ST	Viaduct				X		Not NRE
Syracuse	260	LEON ST	Viaduct				X		Not NRE

Syracuse	264	LEON ST	Viaduct	Not Eligible (6740.006364)					Not NRE
Syracuse	280	LEON ST	Viaduct	Not Eligible (6740.00404)					Not NRE
Syracuse	284	LEON ST	Viaduct				X		Not NRE
Syracuse	208-12	LEON ST	Viaduct				X		Not NRE
Syracuse	234-36	LEON ST	Viaduct	Not Eligible (6740.008089)					Not NRE
Syracuse	268-70	LEON ST	Viaduct				X		Not NRE
Syracuse	274-76	LEON ST	Viaduct				X		Not NRE
Syracuse	105	LOCK ALLEY	Viaduct				X		Not NRE
Syracuse	125	LOCK ALLEY	Viaduct	Not Eligible (6740.010641)					Not NRE
Syracuse	127	LOCK ALLEY	Viaduct	Not Eligible (6740.003562)					Not NRE
Syracuse	101	LODI ST & CANAL ST	Viaduct				X		Not NRE
Syracuse	125	LYNN CIR	South	Not Eligible (6740.011844)					Not NRE
Syracuse	129	LYNN CIR	South				X		Not NRE
Syracuse	133	LYNN CIR	South				X		Not NRE
Syracuse	200	MADISON ST & STATE ST S &	Viaduct				X		Not NRE
Syracuse	426-502	MADISON ST TO HARRISON ST	Viaduct			X			Not NRE
Syracuse	320	MARTIN LUTHR KING E	Viaduct				X		Not NRE
Syracuse	404	MARTIN LUTHR KING E & LEO	Viaduct				X		Not NRE
Syracuse	1425	MCBRIDE ST S	Viaduct	Not Eligible (6740.007431)					Not NRE
Syracuse	1427	MCBRIDE ST S	Viaduct	Not Eligible (6740.001483)					Not NRE
Syracuse	1429	MCBRIDE ST S	Viaduct	Not Eligible (6740.002251)					Not NRE
Syracuse	901-1055	MCBRIDE ST S & ADAMS ST E	Viaduct				X		Not NRE
Syracuse	1101	MCBRIDE ST S & JACKSON ST	Viaduct				X		Not NRE
Syracuse	1435	MCBRIDE ST S & RAYNOR AVE	Viaduct	Not Eligible (6740.003507)					Not NRE
Syracuse	1423	MCBRIDE ST S & SIZER ST	Viaduct	Not Eligible (6740.007432)					Not NRE
Syracuse	1419-21	MCBRIDE ST S & SIZER ST	Viaduct	Not Eligible (6740.007433)					Not NRE
Syracuse	110	MCBRIDE ST S REAR	Viaduct				X		Not NRE
Syracuse	201	MENLO DR	South	Not Eligible (072.-08-05.0)					Not NRE
Syracuse	600	MONTGOMERY ST	Viaduct				X		Not NRE
Syracuse	6801	MYERS RD					X		Not NRE
Syracuse	6849	MYERS RD					X		Not NRE
Syracuse	6861	MYERS RD					X		Not NRE
Syracuse	6865	MYERS RD					X		Not NRE

Syracuse	100	OAK ST & LODI ST	Viaduct	Not Eligible (6740.006546)					Not NRE
Syracuse	142	OAKLAND ST	Viaduct			X			Not NRE
Syracuse	143	OAKLAND ST&STADIUM PL	Viaduct			X			Not NRE
Syracuse	515	OAKWOOD AVE	Viaduct			X			Not NRE
Syracuse	637-39	OAKWOOD AVE	Viaduct	Not Eligible					Not NRE
Syracuse	100-08	ONONDAGA ST E	Viaduct			X			Not NRE
Syracuse	111-13	ONONDAGA ST E	Viaduct		X				Not NRE
Syracuse	130-44	ONONDAGA ST W	Viaduct	NR-eligible (within the South Salina Street Downtown Historic District)				NRE	NRE
Syracuse	514	OSWEGO BLVD	Viaduct	NR-eligible (within the North Salina Historic District)				NRE	NRE
Syracuse	493	OSWEGO BLVD REAR	Viaduct			X			Not NRE
Syracuse	497	OSWEGO BLVD REAR	Viaduct		X				Not NRE
Syracuse	471-81	OSWEGO BLVD/ 1 Webster's Landing/VIP S	Viaduct	NR-eligible	The Marshall & Sons Warehouse constructed in 1893 was designed by Archimedes Russell in the Romanesque Revival style. It is eligible under Criteria A and C as one of few canal-era manufacturing/ warehousing buildings remaining in downtown Syracuse and a fine example of Russell's commercial architecture. (Building 30)			NRE	NRE
Syracuse	107	PARK AVE	Viaduct			X			Not NRE
Syracuse	109	PARK AVE	Viaduct			X			Not NRE
Syracuse	111	PARK AVE	Viaduct	Not Eligible (6740.010644)					Not NRE
Syracuse	113	PARK AVE	Viaduct	Not Eligible (6740.004133)					Not NRE
Syracuse	200-232	PARK AVE & PLUM ST	Viaduct		The former George Washington Public School, built in 1915, is significant under Criterion A as an early surviving public school in downtown Syracuse and under Criterion C as unusual early 20th century variation on the Neoclassical style applied to an institutional building (Letter ID R).			X	NRE
Syracuse	400	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	404	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	410	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	412	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE

Syracuse	416	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	418	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	500	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	320-24	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	502-04	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	506-24	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	504	PEARL ST REAR	Viaduct						No Information
Syracuse	124	PLUM ST	Viaduct	Not Eligible (6740.002323)					Not NRE
Syracuse	308	PLUM ST	Viaduct			X			Not NRE
Syracuse	310	PLUM ST	Viaduct			X			Not NRE
Syracuse	500	PLUM ST & ONONDAGA CRK	Viaduct		X				Not NRE
Syracuse	208	PLUM ST & PARK AVE	Viaduct			X			Not NRE
Syracuse	104-18	PLUM ST & TRACY ST TO WES	Viaduct		X				Not NRE
Syracuse	301	PROSPECT AVE TO LAUREL ST/ Saint Joseph	Viaduct	NR-eligible (06740.001331)	St. Joseph's Hospital Nurses Home at 321-323 Prospect Avenue was built in 1910 and designed by Archimedes Russell in the Neo-Classical style. It is eligible under Criterion C as an example of the institutional architecture by a locally prominent architect. (Building 31)			NRE	NRE
Syracuse	416	RAYNOR AVE E	Viaduct			X			Not NRE
Syracuse	605-11	RAYNOR AVE E & HENRY ST &	Viaduct			X			Not NRE
Syracuse	325	RENWICK AVE	Viaduct			X			Not NRE
Syracuse	500	RENWICK AVE	Viaduct			X			Not NRE
Syracuse	99	SALINA ST N	Viaduct		Clinton Square, an early park in downtown Syracuse is dominated by the Soldiers and Sailors Monument designed by sculptor Cyrus Edwin Dallin circa 1910. It is eligible for the National Register under Criteria A and C (Letter ID S).			X	NRE

Syracuse	330	SALINA ST N	Viaduct	NR-listed (Non-Contributing to the North Salina Street Historic District 1999 Expansion)				NRL N/C	NRL N/C
Syracuse	344	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL N/C	NRL N/C
Syracuse	429	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	435	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	437	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	443	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	447	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	449	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	466	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	478	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL



Syracuse	484	SALINA ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	488	SALINA ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	500	SALINA ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	517	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	523	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	530	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	539	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	547	SALINA ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	553	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	557	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	601	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	613	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	619	SALINA ST N	Viaduct	NR-listed (Non-contributing to the North Salina Street Historic District)				NRL	NRL

Syracuse	649	SALINA ST N	Viaduct			X			Not NRE
Syracuse	101-239	SALINA ST N	Viaduct			X			Not NRE
Syracuse	401-11	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	413-15	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	417-19	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	423-25	SALINA ST N	Viaduct	NR-listed (Non-contributing to the North Salina Street Historic District 1999 Expansion)				NRL N/C	NRL N/C
Syracuse	472-74	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District 1999 Expansion)				NRL	NRL
Syracuse	501-05	SALINA ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	507-13	SALINA ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	522-24	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	525-27	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	526-28	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL

Syracuse	529-35	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	541-45	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	561-63	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	567-81	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	603-05	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	607-09	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	615-17	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	633-39	SALINA ST N	Viaduct	NR-listed (Contributing to the North Salina Street Historic District)				NRL	NRL
Syracuse	108-12	SALINA ST N & JAMES ST/ Community Ch	Viaduct	NR-listed (90NR02101)	The Third National Bank located at 107 James Street was constructed in 1885 in the Queen Anne style. It is significant under Criterion A for its associated with the late nineteenth commercial district of Syracuse, and Criterion C as an example of restrained High Victorian architectural style designed by Archimedes Russell. (Building 35)			NRL	NRL
Syracuse	100	SALINA ST N & JAMESST/ Syracuse Savings	Viaduct	NR-listed (90NR02096)	The Syracuse Savings Bank located at 102 North Salina Street was originally constructed in 1876 and designed by Joseph Lyman Silsbee with coordinated electric clocks by Charles Fasoldt of Albany. It is significant under Criterion C as an example of commercial architecture designed by Joseph Lyman Silsbee. (Building 36)			NRL	NRL
Syracuse	539	SALINA ST N REAR	Viaduct				X		Not NRE

Syracuse	120-22	SALINA ST N/ 100 Clinton Square Commercial	Viaduct	NR-eligible (06740.001425)	100 Clinton Square located at 120-124 North Salina Street was constructed in 1927. It is eligible under Criterion C as a significant example of twentieth century commercial architecture in downtown Syracuse. (Building 33)			NRE	NRE
Syracuse	319-25	SALINA ST N/ 315 North Salina Street	Viaduct	<b>NR-listed(within the North Salina Street Historic District 1999 Expansion) (06740.001732)</b>				NRL	NRL
Syracuse	329	SALINA ST N/ Learbury Center	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	114-18	SALINA ST N/ One Clinton Square Commercial	Viaduct	NR-eligible (06740.001424)	One Clinton Square located at 114-118 North Salina Street was constructed in 1893 in the Romanesque Revival style. It is eligible under Criterion C as a significant example of nineteenth century commercial architecture. (Building 32)			NRE	NRE
Syracuse	126-28	SALINA ST N/Commercial Building	Viaduct	NR-eligible (06740.001426)	The building located at 128 North Salina Street was constructed ca. 1852 in the Italianate style. It is eligible under Criterion C as one of the oldest examples of early commercial Italianate architectural design in Syracuse. (Building 34)			NRE	NRE
Syracuse	98	SALINA ST S	Viaduct				X		Not NRE
Syracuse	101	SALINA ST S	Viaduct	NR-eligible (within the Hanover Square Historic District)				NRE	NRE
Syracuse	131	SALINA ST S	Viaduct			X			Not NRE
Syracuse	100-36	SALINA ST S	Viaduct			X			Not NRE
Syracuse	484-98	SALINA ST S	Viaduct	<b>NR-listed (Non-contributing to the South Salina Street Downtown Historic District 2014 Expansion)</b>				NRL	NRL
Syracuse	501-23	SALINA ST S	Viaduct			X			Not NRE
Syracuse	500-50	SALINA ST S/ Chimes Building	Viaduct	<b>NR-listed (Contributing to the South Salina Street Downtown Historic District 2014 Expansion)</b>				NRL	NRL
Syracuse	107	SATURN DR	South			X			Not NRE
Syracuse	390	SENECA TNPK E	South				X		Not NRE
Syracuse	401	SENECA TNPK E	South				X		Not NRE
Syracuse	468	SENECA TNPK E	South			X			Not NRE
Syracuse	485	SENECA TNPK E	South				X		NRE
Syracuse	491	SENECA TNPK E	South	Not Eligible (6740.010559)					Not NRE

Syracuse	362-72	SENECA TNPK E	South	Not Eligible (6740.013397)					Not NRE
Syracuse	382	SENECA TNPK E/ House	South		The residence associated with Newell House at 382 East Seneca Turnpike in the former hamlet known as Onondaga Hollow, south of downtown Syracuse. The property meets National Register Criteria A and C as a mid-19th century vernacular residence associated with a prominent local family. It is noted as one of the earliest remaining houses in the hamlet of Onondaga Hollow (Letter ID T).			X	NRE
Syracuse	140	SLINDES WOODS CIR				X			Not NRE
Syracuse	142	SLINDES WOODS CIR				X			Not NRE
Syracuse	144	SLINDES WOODS CIR				X			Not NRE
Syracuse	146	SLINDES WOODS CIR				X			Not NRE
Syracuse	148	SLINDES WOODS CIR				X			Not NRE
Syracuse	150	SLINDES WOODS CIR				X			Not NRE
Syracuse	152	SLINDES WOODS CIR				X			Not NRE
Syracuse	128	SPENCER ST TO SOLAR ST &	Viaduct	Not Eligible (6740.00248)					Not NRE
Syracuse	106MONTGOMERY ST/ Engine House #1		Viaduct	<b>NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 000646)</b>				NRL	NRL
Syracuse	413	STATE ST N	Viaduct	Not Eligible (6740.002423)					Not NRE
Syracuse	503	STATE ST N	Viaduct				X		Not NRE
Syracuse	505	STATE ST N	Viaduct				X		Not NRE
Syracuse	507	STATE ST N	Viaduct	Not Eligible (6740.010674)					Not NRE
Syracuse	509	STATE ST N	Viaduct				X		<b>*NRE</b>
Syracuse	515	STATE ST N	Viaduct	Not Eligible (6740.006889)					Not NRE
Syracuse	602	STATE ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	606	STATE ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	610	STATE ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	910	STATE ST N	Viaduct	Not Eligible (6740.004217)					Not NRE
Syracuse	912	STATE ST N	Viaduct				X		Not NRE
Syracuse	914	STATE ST N	Viaduct				X		Not NRE

Syracuse	924	STATE ST N	Viaduct				X		Not NRE
Syracuse	1025	STATE ST N	Viaduct				X		Not NRE
Syracuse	1032	STATE ST N	Viaduct				X		Not NRE
Syracuse	1034	STATE ST N	Viaduct				X		Not NRE
Syracuse	1104	STATE ST N	Viaduct				X		Not NRE
Syracuse	1106	STATE ST N	Viaduct	Not Eligible (6740.002721)					Not NRE
Syracuse	1108	STATE ST N	Viaduct	Not Eligible (6740.002276)					Not NRE
Syracuse	1112	STATE ST N	Viaduct	Not Eligible (6740.006053)					Not NRE
Syracuse	1114	STATE ST N	Viaduct	Not Eligible (6740.012531)					Not NRE
Syracuse	1120	STATE ST N	Viaduct				X		Not NRE
Syracuse	1122	STATE ST N	Viaduct				X		Not NRE
Syracuse	1124	STATE ST N	Viaduct				X		Not NRE
Syracuse	1126	STATE ST N	Viaduct				X		Not NRE
Syracuse	1128	STATE ST N	Viaduct				X		Not NRE
Syracuse	1006-08	STATE ST N	Viaduct				X		Not NRE
Syracuse	301-19	STATE ST N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	409-11	STATE ST N	Viaduct	Not Eligible (6740.002421)					Not NRE
Syracuse	417-19	STATE ST N	Viaduct				X		*NRE
Syracuse	511-13	STATE ST N	Viaduct				X		*NRE
Syracuse	521-23	STATE ST N	Viaduct		The residence at 521-523 North State Street is a late 19th century, two-and-a-half-story double house located on the west side of North State Street, south of East Laurel Street. Like its nearly identical neighbor at 525-527 North State Street, it is eligible for the National Register under Criterion C as an intact example of a late 19th century double house drawing on Queen Anne and Italianate-style architectural sources (Letter ID U).			X	NRE
Syracuse	525-27	STATE ST N	Viaduct		The residence at 525-527 North State Street is a late 19th century, two-and-a-half-story double house located on the west side of North State Street, south of East Laurel Street. Like its nearly identical neighbor at 521-523 North State Street, it is eligible for the National Register under Criterion C as an intact example of a late 19th century double house drawing on Queen Anne and Italianate-style architectural sources (Letter ID V).			X	NRE
Syracuse	622-30	STATE ST N	Viaduct	NR-eligible (within the North Salina Street District 2016 Expansion)				NRE	NRE

Syracuse	820-28	STATE ST N	Viaduct		The building meets National Register Criteria A and C as an early 19th century commercial building with a distinctive architectural style, long associated with the meat industry (Letter ID X).X			X	NRE
Syracuse	904-06	STATE ST N	Viaduct				X		Not NRE
Syracuse	832-46	STATE ST N & ASH ST	Viaduct				X		Not NRE
Syracuse	1121	STATE ST N & BASIN ST	Viaduct				X		Not NRE
Syracuse	501	STATE ST N & BELDEN AVE E	Viaduct				X		Not NRE
Syracuse	429	STATE ST N & BELDEN AVE E/ A. Angeloro	Viaduct	NR-eligible (06740.002425)	The Angeloro commercial building located at 421-425 North State Street was constructed in 1904. It is eligible under Criterion A for its association with the history of the Italian-American community, and under Criterion C as a distinctive and intact example of a turn-of-the-century commercial building. (Building 37)			NRE	NRE
Syracuse	1042	STATE ST N & CATAWBA ST	Viaduct						No Information
Syracuse	1100	STATE ST N & CATAWBA ST	Viaduct						No Information
Syracuse	1425	STATE ST N & DANFORTH ST	Viaduct				X		Not NRE
Syracuse	1001	STATE ST N & DIVISION ST	Viaduct				X		Not NRE
Syracuse	401	STATE ST N & HICKORY ST	Viaduct	Not Eligible (6740.010678)					Not NRE
Syracuse	1130	STATE ST N & ISABELLA ST	Viaduct				X		Not NRE
Syracuse	214	STATE ST N & WILLOW ST E/ Saint John the	Viaduct	NR-eligible (06740.000137)	The St. John the Evangelist Rectory located at 214 North State Street was constructed in 1874 in the Italianate style. It is eligible under Criterion C as a distinctive example of the architecture of Archimedes Russell and is the earliest Russell designed residence in Syracuse. (Building 38)			NRE	NRE
Syracuse	215	STATE ST N & WILLOW ST E/ St John the E	Viaduct		Saint John the Evangelist Church is eligible for the National Register of Historic Places under Criteria A and C as a largely intact, prominent Gothic Revival-style church representative of Syracuse's mid-nineteenth century development (Letter ID W)			X	NRE
Syracuse	1201	STATE ST N TO BASIN ST	Viaduct				X		Not NRE
Syracuse	1207	STATE ST N TO BASIN ST	Viaduct				X		Not NRE
Syracuse	1313	STATE ST N TO BASIN ST	Viaduct				X		Not NRE
Syracuse	1010-14	STATE ST N TO LOCK ALY	Viaduct				X		Not NRE
Syracuse	1016-20	STATE ST N TO LOCK ALY	Viaduct				X		Not NRE
Syracuse	1022-28	STATE ST N TO LOCK ALY	Viaduct	Not Eligible (6740.002546)					Not NRE
Syracuse	901	STATE ST N TO OSWEGO BLVD	Viaduct				X		Not NRE
Syracuse	915	STATE ST N TO OSWEGO BLVD	Viaduct				X		Not NRE

Syracuse	909	STATE ST N TO OSWEGO BLVD/ Wag Food	Viaduct		The former Wag Foods warehouse at 909 North State Street is eligible for the National Register of Historic Places under Criteria A and C as a relatively intact example of an early 20 <sup>th</sup> century grocery warehouse associated with a major Syracuse-based grocery distributor (Letter ID Y).			X	NRE
Syracuse	701	STATE ST N TO SALT ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	705	STATE ST N TO SALT ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	707-09	STATE ST N TO SALT ST	Viaduct	NR-eligible (6740.003233)	The brick commercial building at 707-09 North State Street was built in the early 19th century and is eligible under Criterion C. (Building 39)			NRE	NRE
Syracuse	117	STATE ST S	Viaduct				X		Not NRE
Syracuse	727	STATE ST S	Viaduct			X			Not NRE
Syracuse	900	STATE ST S & ADAMS ST E	Viaduct	Not Eligible (6740.012115)					Not NRE
Syracuse	817-35	STATE ST S & ADAMS ST E	Viaduct			X			Not NRE
Syracuse	800	STATE ST S & HARRISON ST	Viaduct			X			Not NRE
Syracuse	99	STATE ST S & WATER ST E &	Viaduct			X			Not NRE
Syracuse	701-23	STATE ST S TO HARRISON ST	Viaduct				X		Not NRE
Syracuse	1118	STATE STN	Viaduct				X		Not NRE
Syracuse	133	SUNRISE DR	South			X			Not NRE
Syracuse	139	SUNRISE DR	South			X			Not NRE
Syracuse	145	SUNRISE DR	South			X			Not NRE
Syracuse	151	SUNRISE DR	South			X			Not NRE
Syracuse	157	SUNRISE DR	South			X			Not NRE
Syracuse	163	SUNRISE DR	South			X			Not NRE
Syracuse	169	SUNRISE DR	South	Not Eligible (6740.013481)					Not NRE
Syracuse	115	SUNRISE DR REAR	South				X		Not NRE
Syracuse	208	SUNSET AVE	Viaduct	Not Eligible (6740.011236)					Not NRE
Syracuse	210	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	220	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	304	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	306	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	308	SUNSET AVE	Viaduct	Not Eligible (6740.013166)					Not NRE
Syracuse	310	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	312	SUNSET AVE	Viaduct	Not Eligible (6740.006268)					Not NRE



Syracuse	316	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	318	SUNSET AVE	Viaduct	Not Eligible (6740.009042)					Not NRE
Syracuse	320	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	402	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	418	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	420	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	204-06	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	212-14	SUNSET AVE	Viaduct	Not Eligible (6740.013311)					Not NRE
Syracuse	406-14	SUNSET AVE	Viaduct	Not Eligible (6740.007548)					Not NRE
Syracuse	111-13	SUNSET AVE & BASIN ST	Viaduct				X		Not NRE
Syracuse	424	SUNSET AVE & BEAR ST	Viaduct	Not Eligible (6740.004058)					Not NRE
Syracuse	400	SUNSET AVE & TURTLE ST	Viaduct				X		Not NRE
Syracuse	101	SUNSET AVE TO BASIN ST	Viaduct				X		Not NRE
Syracuse	103	SUNSET AVE TO BASIN ST	Viaduct	Not Eligible (6740.004059)					Not NRE
Syracuse	500	TAYLOR ST E & MCBRIDE ST	Viaduct			X			Not NRE
Syracuse	301-11	TAYLOR ST E & STATE ST S	Viaduct			X			Not NRE
Syracuse	204	TOWNSEND ST N	Viaduct	Not Eligible (6740.000369)	The two-story residence at 204 North Townsend Street was built in 1929 and is an example of 1920s vernacular architecture. (Building 40)				Not NRE
Syracuse	117	TOWNSEND ST N & BROWN ST	Viaduct				X		Not NRE
Syracuse	201	TOWNSEND ST N & BURNET AV/ Benjamin	Viaduct	Not Eligible(6740.000255)	The residence at 201 North Townsend Street was built in the late 19th century. It is eligible under Criterion C as an intact example of a wood frame Victorian residence. (Building 44)				Not NRE
Syracuse	202	TOWNSEND ST N & BURNET AV/ Samuel S	Viaduct	NR-eligible (6740.000368)	The Samuel Stapely House located at 202 North Townsend Street was constructed ca. 1850 in the Italianate style. It is eligible under Criterion C as an example of Italianate-style residential architecture. (Building 45)			NRE	NRE
Syracuse	206	TOWNSEND ST N/ Frederick Featherly House	Viaduct	NR-eligible (6740.00037)	The Frederick Featherly House located at 206 North Townsend Street was constructed in 1852 in the Greek Revival style. It is eligible under Criterion C as an example of nineteenth century Greek Revival architecture. (Building 42)			NRE	NRE
Syracuse	207	TOWNSEND ST N/ Spaulding House	Viaduct	Not Eligible (6740.000253)	The Spaulding House located at 207 North Townsend Street was constructed ca. 1885. The house is eligible under Criterion B for its association with prominent Syracuse clergyman, the Reverend George B. Spaulding, and under Criterion C, as an example of late nineteenth residential architecture. (Building 43)				Not NRE

Syracuse	205	TOWNSEND ST N/ Wolverine Apartments	Viaduct	NR-listed (6740.000254)	The Wolverine Apartments located at 205 North Townsend Street were constructed in 1929. They are eligible under Criterion C as an example of early twentieth century apartment architecture. (Building 41)			NRL	NRL
Syracuse	115	TOWNSEND ST S	Viaduct				X		Not NRE
Syracuse	507-17	TOWNSEND ST S	Viaduct			X			Not NRE
Syracuse	1031-59	TOWNSEND ST S & ADAMS ST	Viaduct	Not Eligible (6740.00446)					Not NRE
Syracuse	301	TOWNSEND ST S & FAYETTE S/ Park Cent	Viaduct	NR-eligible (06740.000624)	The Park Central Presbyterian Church located at 310 South Townsend Street was constructed in 1872-1873 in the Gothic Revival style by Archimedes Russell. It is eligible under Criterion C as an example of the Gothic Revival style of architecture designed by Archimedes Russell. (Building 47)			NRE	NRE
Syracuse	307	TOWNSEND ST S & GENESEE S/ Hamilton	Viaduct	NR-listed (90NR02105)	The Hamilton White House was constructed in 1845 in the Greek Revival style. It is significant under Criterion B for its association with Hamilton White, and Criterion C as an example of Greek Revival architecture. (Building 48)			NRL	NRL
Syracuse	601	TOWNSEND ST S & MCCARTHY	Viaduct			X			Not NRE
Syracuse	105	TOWNSEND ST S & WATER ST/ 500 East V	Viaduct	NR-eligible (06740.011635)	The commercial building located at 105 South Townsend Street was constructed circa 1865. It is eligible under Criterion C. (Building 49)			NRE	NRE
Syracuse	205	TOWNSEND ST S/ 205 South Townsend Str	Viaduct	NR-eligible (06740.000668)	205 South Townsend Street is a Greek Revival style residence constructed ca. 1850. Determined NR-eligible under Criterion C, it is the only remaining example of a modest Greek Revival style house, a once common type, in what is now the central business district of Syracuse. (Building 46)			NRE	NRE
Syracuse	107-109	TOWNSEND ST/ Phoenix Foundry & Machin	Viaduct		107-109 South Townsend Street is eligible for the National Register of Historic Places under Criteria A and C for its association with several prominent local manufacturing companies in the late 19 <sup>th</sup> and early 20 <sup>th</sup> centuries and as an intact example of late 19 <sup>th</sup> century industrial architecture.			X	NRE
Syracuse	110-12	TOWNSEND STS & WATER ST	Viaduct				X		Not NRE
Syracuse	132	TURTLE ST & SUNSET AVE	Viaduct				X		Not NRE
Syracuse	103	UNION AVE REAR	Viaduct			X			Not NRE
Syracuse	401	VAN BUREN ST	Viaduct				X		Not NRE
Syracuse	126-34	WARREN ST N	Viaduct				X		Not NRE
Syracuse	601-77	WARREN ST S & ADAMS ST E	Viaduct	Not Eligible (6740.013668)					Not NRE
Syracuse	415	WASHINGTON ST E	Viaduct				X		Not NRE
Syracuse	441-43	WASHINGTON ST E	Viaduct				X		Not NRE
Syracuse	521-27	WASHINGTON ST E	Viaduct				X		Not NRE
Syracuse	712-16	WASHINGTON ST E	Viaduct				X		Not NRE
Syracuse	301	WASHINGTON ST E & MARKET/ Sen. Hugh	Viaduct				X		Not NRE

Syracuse	506-18	WASHINGTON ST E & TOWNSEN	Viaduct				X		Not NRE
Syracuse	447-49	WASHINGTON ST E & TOWNSEND	Viaduct				X		Not NRE
Syracuse	511-19	WASHINGTON ST E TO BLOCK	Viaduct						No Information
Syracuse	430	WASHINGTON ST E TO LANDMA	Viaduct				X		Not NRE
Syracuse	727	WASHINGTON ST E TO WATER	Viaduct			X			Not NRE
Syracuse	501	WASHINGTON ST E/ Brown Place	Viaduct	NR-eligible (06740.000494)	The four-story Brown Place was constructed in 1890 by builder John A. Gee in the Queen Anne Style. It is eligible under Criteria A and C as one of the few remaining examples of eclectic Victorian architecture in Syracuse. (Building 51)			NRE	NRE
Syracuse	233	WASHINGTON ST E/ Syracuse City Hall	Viaduct	<b>NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (90NR02109)</b>	The Syracuse City Hall located at 233 East Washington Street was constructed between 1889 through 1893. It is eligible under Criterion C as an excellent example of Romanesque Revival architecture. (Building 50)			NRL	NRL
Syracuse	360	WASHINGTON ST W & WEST S	Viaduct			X			Not NRE
Syracuse	100	WATER ST E	Viaduct	NR-eligible (within the Hanover Square Historic District)				NRE	NRE
Syracuse	250	WATER ST E	Viaduct	<b>NR-listed (Contributes to Hanover Square Historic District 2014 Expansion)</b>				NRL	NRL
Syracuse	257	WATER ST E	Viaduct	<b>NR-listed (Open space within Hanover Square Historic District [no Contributing status])</b>				NRL	NRL
Syracuse	301	WATER ST E & ERIE BLVD E/ Weighlock B	Viaduct	<b>NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (90NR02097)</b>	The Weighlock Building located at 301 East Water Street was built in 1850 and is listed under Criterion A and C for its association with the Erie Canal and as an intact example of industrial architecture. (Building 52)			NRL	NRL
Syracuse	730	WATER ST E & FORMAN AVE	Viaduct				X		Not NRE
Syracuse	800-16	WATER ST E & FORMAN AVE	Viaduct			X			Not NRE
Syracuse	421	WATER ST E & TOWNSEND ST	Viaduct			X			Not NRE
Syracuse	1011	WATER ST E & UNIVERSITY A	Viaduct				X		Not NRE

Syracuse	319-21	WATER ST E / 319 East Water Street	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 004565)				NRL	NRL
Syracuse	207-33	WATER ST E TOERIE BLVD E/ Former 4stor	Viaduct	NR-eligible (within the Hanover Square Historic District) (06740. 013092)				NRE	NRE
Syracuse	246-48	WATER ST E/ 246 East Water Street	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 011724)				NRL	NRL
Syracuse	251	WATER ST E/ 251 East Water Street	Viaduct	NR-eligible (within the Hanover Square Historic District) (06740. 013177)				NRE	NRE
Syracuse	258	WATER ST E/ 258 East Water Street	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 003584)				NRL	NRL
Syracuse	311-17	WATER ST E/ 311- 317 East Water Street	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2104 Expansion) (06740. 005893)				NRL	NRL
Syracuse	327-35	WATER ST E/ 327 East Water Street	Viaduct	NR-listed (Non-Contributing in the Hanover Square Historic District 2104 Expansion) (06740. 013180)				NRL N/C	NRL N/C
Syracuse	203	WATER ST E/ Bress Chevrolet	Viaduct	NR-listed (Contributing to the Hanover Square Historic District)				NRL	NRL
Syracuse	235	WATER ST E/ Commercial Building	Viaduct	NR-eligible (within the Hanover Square Historic District) (06740. 001449)				NRE	NRE
Syracuse	239	WATER ST E/ Commercial Building	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2104 Expansion) (06740. 001450)				NRL	NRL

Syracuse	135	WATER ST E/ Dana Building	Viaduct	NR-listed (Contributing to the Hanover Square Historic District)				NRL	NRL
Syracuse	119-21	WATER ST E/ Gere (Robert) Bank Building	Viaduct	NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District) (90NR02099)	The Gere Bank Building located at 119-21 East Water Street was constructed in 1894 by architect, Charles Colton. It is eligible under Criterion C. (Building 54)			NRL	NRL
Syracuse	101-13	WATER ST E/ Onondaga County Savings Ba	Viaduct	NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District) (90NR02098)	The Onondaga County Savings Bank Gridley Building located at 10113 East Water Street was constructed in 1867 in the Second Empire style and designed by architect, Horatio N. White. It is eligible under Criterion C. (Building 53)			NRL	NRL
Syracuse	123	WATER ST E/ Phoenix Buildings	Viaduct	NR-listed (Contributes to Hanover Square Historic District)				NRL	NRL
Syracuse	325	WATER ST E/ Warehouse	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740.000633)				NRL	NRL
Syracuse	243-49	WATER ST E/Commercial Building	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740.001451)				NRL	NRL
Syracuse	125-31	WATER ST E/Phillips Block (125-127)Phoeni	Viaduct	NR-listed (Contributing to the Hanover Square Historic District)				NRL	NRL
Syracuse	324	WATER ST W TO ERIE BLVD W	Viaduct	Not Eligible (6740.013738)					Not NRE
Syracuse	376	WATER ST W TO ERIE BLVD W/ Commerci	Viaduct	NR-eligible (06740.000568)	A large brick industrial building, 376 Water Street is eligible under Criterion C as a relatively intact example of late 19th century industrial/ commercial architecture. (Building 56)			NRE	NRE
Syracuse	208	WATER ST W/ Amos Block	Viaduct	NR-listed (90NR02112)	The Amos Block located at 210-216 West Water Street was constructed in 1878 and designed by Joseph Lyman Silsbee. It is listed under Criterion B for its association with Jacob Amos, and Criterion C as an example of Romanesque architecture designed by Joseph Lyman Silsbee. (Building 55)			NRL	NRL
Syracuse	205	WEST ST N	Viaduct				X		Not NRE
Syracuse	215-17	WEST ST N	Viaduct				X		Not NRE

Syracuse	111-13	WILLOW ST E	Viaduct				X		Not NRE
Syracuse	123-29	WILLOW ST E/ Howard & Jennings Pump Fa	Viaduct	NR-eligible (06740.000635)	The Colella Galleries Building was constructed in 1879 and designed by Charles E. Colton in the Gothic Revival style. It is eligible under Criterion C as one of the few Victorian Gothic commercial building facades remaining in Syracuse. (Building 57)			NRE	NRE
Syracuse	234-48	WILLOW ST W & FRANKLIN ST	Viaduct				X		Not NRE
Syracuse	230	WILLOW ST W/ C.W. Snow & Company Wa	Viaduct	<b>NR-listed (06NR05624)</b>	The C.W. Snow & Company Warehouse located at 230 West Willow Street was constructed in 1913 and designed by Archimedes Russell. It is eligible under Criterion C as an excellent local example of an early modern poured-in-place concrete building designed by Archimedes Russell. (Building 58)			NRL	NRL

\* NYS Department of Transportation has determined these properties to not be eligible for inclusion in the National Register of Historic Places but the NY State Historic Preservation Office has found that they **do meet** the eligibility criteria.



Department of  
Transportation

ANDREW M. CUOMO  
Governor

MATTHEW J. DRISCOLL  
Commissioner

Cathy Calhoun  
Chief of Staff

September 27, 2016

Robert Davies, District Engineer  
Federal Highway Administration, NY Division  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

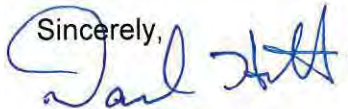
RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
*Phase 1A Archaeological Sensitivity Assessment*  
*Architectural Resources Survey*  
OPRHP 16PR06314

Dear Mr. Davies:

For your information, enclosed are the *Phase 1A Archaeological Sensitivity Assessment* and the *Architectural Resources Survey* reports, prepared for the I-81 Viaduct Project (the Project) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). On September 19, 2016, the New York State Department of Transportation (NYSDOT), Office of Environment, transmitted these reports to the New York State Historic State Historic Preservation Office. A typographical error in the date on the cover of the *Architectural Resources Survey* report has since been revised to accurately reflect the completion date of September 16, 2016.

Also enclosed is a copy of an updated letter with attached Building Eligibility Assessment from the SHPO, dated September 22, 2016, which you received electronically via email. This letter states that the SHPO has received, reviewed and concurs with the NYSDOT recommendations regarding the *area of potential effects* (APE) for the Project, as defined in the document submitted for SHPO review on September 12, 2016.

If you have any questions or would like additional information, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

Sincerely,  


Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/jp/ms

Encl: I-81 Viaduct Project – Phase 1A Archaeological Sensitivity Assessment  
I-81 Viaduct Project - Architectural Resources Survey  
SHPO letter dated September 22, 2016 w/attachment

cc: C. Wilson, Program Analyst, Advisory Council on Historic Preservation (w/ encl)  
J. Bonafide, NYS Office of Parks, Recreation, and Historic Preservation (w/out encl)  
M. Frechette, Project Director, NYSDOT (w/out encl)  
J. Flint, Project Manager, NYSDOT (w/out encl)  
J. Adams, NYSDOT (w/out encl)





September 30, 2016

Tony Gonyea  
c/o Law Office of Joseph Heath  
512 Jamesville Avenue  
Syracuse, NY 13210

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
*Phase 1A Archaeological Sensitivity Assessment*  
*Architectural Resources Survey*  
OPRHP 16PR06314

Dear Mr. Gonyea:

As part of continuing consultation between the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the New York State Department of Transportation (NYSDOT), and the Federal Highway Administration (FHWA) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800), NYSDOT is transmitting to the Onondaga Nation the following materials as they relate to the I-81 Viaduct project:

1. The *Phase 1A Archaeological Sensitivity Assessment*
2. The *Architectural Resources Survey*
3. A letter dated September 22, 2016 from the SHPO to NYSDOT with attached Building Eligibility Assessment table

Copies of these reports have been transmitted to the SHPO and FHWA. SHPO has provided comments, as noted in their September 22, 2016 letter (attached).

The *Phase 1A Archeological Sensitivity Assessment* provides an assessment of the potential presence of archaeological resources within the project's area of potential effect (APE), as the initial phase of a phased approach to the identification and evaluation of archaeological properties. NYSDOT, on behalf of FHWA, is soliciting the views of the Onondaga Nation regarding the results of this study and preliminary recommendations for archaeological investigations.

If you have any questions or would like additional information, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA and in coordination with NYSDOT, thank you for taking part in Section 106 consultation for this project.

Sincerely,  


Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/jp

Encl: I-81 Viaduct Project – Phase IA Archaeological Sensitivity Assessment  
(1 hard copy and 3 electronic copies in .pdf format on CD)  
I-81 Viaduct Project - Architectural Resources Survey  
(1 electronic copy in .pdf format on CD)  
SHPO letter dated September 22, 2016 w/attachment  
(3 hard copies)

cc: Chief Irving Powless, Jr., Onondaga Nation (w/encl)  
Thane Joyal, Law Offices of Joseph Heath, Onondaga Nation (w/ electronic encl)  
Steve Thomas, Onondaga Nation (w/ electronic copy)  
Nancy Herter, NYSOPRHP/SHPO (w/out encl)  
Robert Davies, FHWA (w/out encl)  
Patricia Millington, FHWA (w/out encl)  
Mark Frechette, Project Director, NYSDOT (w/out encl)  
Joseph Flint, Project Manager, NYSDOT (w/out encl)  
Jon Adams, NYSDOT (w/out encl)

512 Jamesville Avenue  
Syracuse, NY 13210

November 14, 2016

Mr. Daniel P. Hitt  
Director, Office of the Environment  
NYS Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Dear Mr. Hitt,

Tony Gonyea asked me to convey his comments on these documents to you. He is very grateful for the opportunity to review this document on behalf of the Onondaga Nation, and looks forward to continuing to work with you all on this project.

The Phase IA was extremely difficult to review because the vertical extent of the proposed project has not yet been defined. Therefore it is hard to give more than general feedback on the specific proposals—there just is not enough to go on. Despite, or perhaps because of the lack of specificity there are some very specific concerns, as follows.

The Nation's overwhelmingly strong preference is to avoid disturbing human remains, and this needs to be accounted for in the report. This means that should human remains be encountered during construction through inadvertent excavation, all construction will need to stop, so that the Nation can be consulted and measures designed and taken to avoid disturbing the remains. Remains must not be excavated or moved. Remains must be protected from compression damage.

The report is very vague about the process that will be followed should human remains be encountered during construction, and refers generally to a "temporary cessation of construction". See pp. 235-236. This approach is simply not acceptable: in the event human remains are located during construction it will be necessary to stop construction and consult with the Nation about the appropriate next steps, specifically to redesign and/or potentially relocate the project to protect the remains in situ. The reference to the Haudenosaunee Protocol on Human remains on p. 236 alone is not sufficient to ensure that the necessary consultation will occur. The report should be revised to indicate both that DOT will undertake consultation, and will take appropriate measures to respect the protocol and the Nation's wishes with regard to any human remains.



This discussion underscores the tremendous importance of doing as much archeological investigation prior to initiation of construction as possible. This is true whether or not the area to be investigated is currently accessible or is currently under pavement or other impervious surface, and it is of critical importance to avoid delays due to inadvertent discovery of human remains during construction.

It is simply not possible or adequate to rely on archeological monitoring during construction to adequately protect human remains. This is not only true of those remains which could be disturbed by excavation during construction, but also for those remains which could be damaged by compression. Monitoring during construction will be wholly ineffective in protecting remains which could be damaged by compression during construction, and in those areas where such damage is possible, we request that thorough testing and investigation be completed prior to construction.

The report also does not appear to take into account the potential for the presence of undisturbed, natural soils to be present below fill layers, or below buildings or other anthropogenic features. Without the vertical extent of the project fully defined this is understandable, however, it is also unacceptable. The report needs to be revised to provide clear guidance for how any area where natural soils may be present will be investigated to determine whether archeological resources or human remains are present.

There are also substantial concerns about the way in which known archeological sites are both identified and described in the report. Could you please provide the actual NYS Museum or OPRHP site forms document for each known site identified in the report, and for Parker sites please provide the original site reference? Without that information it's not possible to interpret the conclusions drawn about sensitivity both for the potential for human remains, i.e. burial sites, as well as for other types of archeological resources, and further not possible to assess whether accurate buffers are provided.

The scale of the map labelled Appendix A, Map 11 is very difficult to review. How does it relate to the plan for investigation prior to construction? It would be very helpful to have a map that clarifies the location of known sites in relation to the APE, perhaps on a simpler background map and in a larger scale. Where is shovel testing happening? What are the mechanical methods proposed for use in the paved areas and under buildings? And how will they be determined? In what timing and following what consultation?

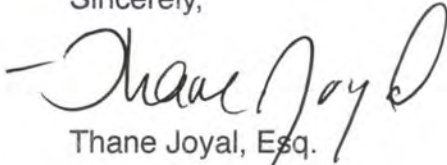
On p. 189 and throughout the document it would be appreciated if you could please avoid the term "Onondaga Indians". Perhaps Onondaga People could be substituted?

Finally, as this process moves forward, it is clear, as we discussed at our in person meeting, that much of the detail around the archeological investigation will be worked out through negotiation of the programmatic agreement for this project between NYSDOT, FHWA and

OPRHP. Although the Nation does not expect or intend to be a party to that agreement, it would be extremely helpful to see an early draft of that document and Tony specifically requests that the Nation be given an opportunity to comment on that document before it is executed.

Thank you very much for your consideration and attention to these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Thane Joyal". The signature is fluid and cursive, with a long horizontal stroke at the beginning and a large, looped "J" for the last name.

Thane Joyal, Esq.

cc: Tony Gonyea  
Joseph Heath, Esq.  
Nancy Herter, OPRHP  
Patricia Millington, FHWA  
Jessica Prockup, NYSDOT



## Department of Transportation

ANDREW M. CUOMO  
Governor

MATTHEW J. DRISCOLL  
Commissioner

Cathy Calhoun  
Chief of Staff

November 21, 2016

John Bonafide  
Director, Bureau of Technical Preservation Services  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
P.O. Box 189 - Peebles Island State Park  
Waterford, New York 12188-09

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
*Architectural Resources Survey*  
OPRHP 16PR06314

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is submitting the enclosed information to the New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act, as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties* as part of continuing consultation to complete and clarify the eligibilities for properties within the APE for the I-81 Viaduct Project.

As a supplement to the inventory and evaluation of historic properties documented in the *Architectural Resources Survey* report (September 16, 2016), the NYSDOT is seeking SHPO concurrence on eligibility recommendations for the following additional properties (see Attachment 1: Additional Properties Map):

- **511-519 Washington Street East:** The Central NY Eye and Tissue Bank building was constructed in 1961 and is recommended Not Eligible. Lacking distinctive characteristics of type, period, and style, the building does not meet the National Register Criteria for Evaluation. See Attachment 2, Photo 1.
- **1042 North State Street:** This two-story brick structure was built circa 1880. Based on historic Sanborn maps, historic directories, and historic newspapers, the property was mainly occupied by boarders in the late 19<sup>th</sup> and early 20<sup>th</sup> centuries. Although it retains an original cornice, it has been highly altered with extensive changes to the fenestration. Due to the loss of historic integrity, this building is recommended Not Eligible. See Attachment 2, Photo 2 & 3.



- **1100 North State Street:** This two-story brick residential structure may date as early as the mid 19<sup>th</sup> century. Alterations include the replacement of original windows, door, and door surround; the modern addition of front steps; and the enclosure of the cornice with vinyl siding. Due to a loss of integrity of design, materials, and workmanship, this building is recommended Not Eligible. See Attachment 2, Photos 4 & 5.
- **Pioneer Homes:** Pioneer Homes occupies eight square blocks of downtown Syracuse, with approximately 60 buildings and a park located within the complex. Constructed between 1938 and 1940, this development was among the earliest federally funded public housing projects in the state of New York following the passage of the United States Housing Act of 1937.

Pioneer Homes is recommended Eligible as a historic district representing a planned community within the context of the "public housing project" property type, meeting National Register Criterion A under Community Planning and Development. The property also qualifies for eligibility under Criterion C for its distinctive features of design. As a planned community, the assemblage of multi-family buildings displays an ordered residential environment characterized by the spatial arrangement of buildings and open space, repetition of design and form, and internal circulation pattern. Despite architectural alterations to individual buildings, the complex retains essential physical features of the original site plan, conveying a visual sense of the Pioneer Homes as a cohesive entity, distinct from the surrounding neighborhood. See Attachment 3, Historic Resource Inventory Form for Pioneer Homes.

Based on additional information received about the North Salina Street Historic District 2016 Expansion, NYSDOT is looking to confirm the status of previously identified buildings within this historic district:

- **204 Butternut Street, 500 North Salina Street and 501-505 North Salina Street:** These buildings were initially considered NRE because they fall within the boundary of the North Salina Street Historic District 2016 Expansion. However, these properties were not included on the National Register nomination form. These buildings are recommended Non-contributing resources within the NRE district. See Attachment 2, Photos 6, 7 and 8.
- **507-513 North Salina Street (USN 06740.123783):** This building was initially considered NRE because it falls within the boundary of the North Salina Street Historic District 2016 Expansion. However, this property was not included on the National Register nomination form. This building is recommended as NRE within the Historic District. See Attachment 2, Photo 9.

Based on review of the provided information, we respectfully request the SHPO's comments and concurrence with recommendations for 511-519 Washington Street East, 1042 North State Street, 1100 North State Street, 204 Butternut Street, 500 North

Salina Street, 501-505 North Salina Street, 507-513 North Salina Street and Pioneer Homes. Once NYSDOT receives SHPO's input we will revise and forward a copy of the updated Building Eligibility Assessment Table.

If you have any questions or would like additional information, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or 518-417-6642.

Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/ms

Encl: Attachment 1 - Additional Properties Map  
Attachment 2 - Photos  
Attachment 3 - Historic Resource Inventory Form for Pioneer Homes

cc: R. Davies, FHWA NY Division (w/encl)  
T. Millington, FHWA NY Division (w/encl)  
C. Wilson, Program Analyst, Advisory Council on Historic Preservation (w/encl)  
M. Frechette, Project Director, NYSDOT (w/out encl)  
J. Flint, Project Manager, NYSDOT (w/out encl)  
J. Adams, NYSDOT (w/out encl)





## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

December 07, 2016

Ms. Jessica Prockup  
Environmental Specialist II  
NYS DOT  
50 Wolf Road  
Albany, NY 12232

Re: FHWA  
Interstate 81 (I-81) Viaduct Project PIN #3501.60  
I-81 at 690  
Towns of Salina, Cicero and Dewitt/City of Syracuse, Onondaga Co.  
16PR06314 (13PR05089 and 13PR05437)  
3501.60

Dear Ms. Prockup:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We continue to review this undertaking in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

We have reviewed the documentation submitted to us dated November 21, 2016 on additional properties as a supplement to the inventory of historic properties documented in the *Architectural Resources Survey Report* (September 16, 2016).

We have reviewed this information and concur with your recommendations to the Federal Highway Administration that the following three properties do not meet the National Register eligibility criteria:

- 511-519 Washington Street East
- 1042 North State Street
- 1100 North State Street

Upon careful review of the documentation on Pioneer Homes it is the SHPO's opinion that this housing complex is not National Register-eligible. Although Pioneer Homes is one of the earliest public housing projects in New York State and was constructed under the National Housing Act of 1934, it is not National Register-eligible due to a significant loss of integrity.

In regard to clarification of the status of buildings in the National Register-eligible North Salina Street Historic District Expansion (Boundary Increase) nos. 204 Butternut Street, 500 North Salina Street and 501 North Salina Street are non-contributing properties whereas 507-513 North Salina Street contributes to the district expansion.

---

### Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [www.nysparks.com](http://www.nysparks.com)

If I can be of any further assistance please do not hesitate to contact me at (518) 268-2168 or [kathy.howe@parks.ny.gov](mailto:kathy.howe@parks.ny.gov).

Sincerely,

A handwritten signature in dark ink that reads "Kathleen A. Howe". The signature is written in a cursive, flowing style.

Kathleen A. Howe  
Survey and Evaluation Coordinator



## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**MATTHEW J. DRISCOLL**  
Commissioner

**Cathy Calhoun**  
Chief of Staff

December 21, 2016

John Bonafide  
Director, Bureau of Technical Preservation Services  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
P.O. Box 189 - Peebles Island State Park  
Waterford, New York 12188-09

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
*Architectural Resources Survey*  
OPRHP 16PR06314

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is submitting the enclosed information in accordance with Section 106 of the National Historic Preservation Act, as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties* to the New York State Historic Preservation Office (SHPO) as part of continuing consultation to complete and clarify the eligibilities for properties within the APE for the I-81 Viaduct Project.

For your information, the NYSHPO Building Eligibility Assessment Table has been updated to reflect the most current information as provided in SHPO's letter dated December 7, 2016. See Attachment 2, Updated Building Eligibility Assessment Table. Further updates were made to clarify the status of the following properties:

- **800 Irving Avenue** (USN 06740.007221): This building has previously been determined Not Eligible. NYSDOT is not recommending a change to its eligibility status.
- **504 Pearl Street (Rear)**: This entry has been consolidated with the table entry for 502-504 Pearl Street, a National Register Eligible (NRE) building within the North Salina Street Historic District Expansion 2016. 504 Pearl Street (Rear) is physically connected to the contributing building at 502-504 Pearl Street, with its own entrance. 504 Pearl Street (Rear) is estimated to date to ca. 1900; it is a square-plan masonry building with a hipped roof. See Attachment 2, Photo 1.

- **105 South Townsend Street and 107-109 South Townsend Street:** Two separate entries have been combined as a single entry, consistent with the CRIS identification of 105-109 South Townsend Street as a NRE property (USN 06740.011635).
- **417-19 State Street North:** This property was recommended as Not Eligible in the *Architectural Resources Survey* report. However, an incorrect photo (showing 425 State Street North, an NRE property) was used for 417-19 State Street North and based on this photo SHPO recommended the property to be NRE. An updated photo for 417-19 State Street North is shown in Attachment 2, Photo 2 showing the property as a vacant parcel. NYSDOT is recommending this property to be removed from consideration in the Building Eligibility Assessment.
- **206 Butternut Street:** This building was initially identified as NRE because it falls within the boundary of the North Salina Street Historic District 2016 Expansion. However, this building had been previously determined Not Eligible (USN 06740.008643). NYSDOT is not recommending a change to its eligibility status.
- **205 Hickory Street, 514 Oswego Boulevard, 484 North Salina Street, 130-44 West Onondaga Street, 484-98 South Salina Street, 100 East Water Street, 257 East Water Street, 606 North State Street, and 506-24 Pearl Street** have been removed from consideration in the Building Eligibility Assessment because they were found to be vacant or parking lots. See Attachment 2, Photos 3 - 11.
- **557 North Salina Street, 601 North Salina Street, and 438-446 North Franklin Street** are on the tables as either NR listed or eligible; the table has been edited to reflect that these buildings have been demolished. See Attachment 2, Photos 12 - 14.
- Upon clarification of the current status of the **North Salina Street District 1999 Expansion** as NRE, all relevant properties were updated on the table from NRL to NRE.
- Upon clarification of the **Hanover Square Historic District 2014 Expansion** being listed on January 25, 2015, all relevant properties were updated on the table from NRE to NRL.
- Several entries on the table were consolidated to reflect one entry to represent single NRL or NRE properties. If multiple addresses are associated with the NR properties all of the addresses are noted within the one entry.
- Street addresses for properties within historic districts have been revised on the table to reflect the addresses contained on the nomination form rather than different addresses, such as mailing addresses.



The numbers have been recalculated and the revised table documents 695 inventoried buildings and structures within the project APE including three Historic Districts and 82 individually eligible or listed properties on the National Register of Historic Places. The last column (SHPO Recommendation) on the table represents the final eligibility status based on consultation with the SHPO.

If you have any questions or would like additional information, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Hitt".

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/ms

Encl: Attachment 1: Photos  
Attachment 2: Updated Building Eligibility Assessment table

cc: R. Davies, FHWA NY Division (w/encl)  
T. Millington, FHWA NY Division (w/encl)  
C. Wilson, Program Analyst, Advisory Council on Historic Preservation (w/encl)  
M. Frechette, Project Director, NYSDOT (w/out encl)  
G. Doucette, NYSDOT (w/out encl)  
J. Adams, NYSDOT (w/out encl)

512 Jamesville Avenue Syracuse,  
NY 13210

March 1, 2017

Ms. Patricia Millington  
Federal Highway Administration  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

Dear Ms. Millington,

I am writing on behalf of Tony Gonyea, of the Onondaga Nation, to provide feedback on the I-81 Viaduct Project Pre-Draft Design Report/Draft Environmental Impact Statement, and specifically on the aspects of those documents and the proposed undertaking that may affect cultural resources, including archeological sites including burials.

I regret the late response to your request for comments. We were expecting to receive a response to the comments we provided on the Draft Phase IA Archeological Sensitivity Assessment, without which it was necessary to make a second and more detailed review of this document. Nonetheless it is clear that adjustments have been made to the current document to reflect Tony's previous comments, and we appreciate those revisions as discussed below.

We would again note that despite the effort put into the substantial and comprehensive literature review for the project, the Phase IA remains extremely difficult to review because it appears that the vertical extent of the proposed project has still not yet been defined. Therefore it is still not possible to give more than general feedback on the specific proposals-there just is not enough to go on. Despite, or perhaps because of the lack of specificity there are some very specific concerns, which we hope to see addressed in the Phase IB Workplan and the MOA or Programmatic Agreement developed for the project, which we note, are not part of the current submission.

The absence of the Phase IB Workplan and either a draft MOA or Programmatic Agreement indicating how adverse effects will be resolved makes it further difficult to adequately review this document and difficult to understand what the adverse effects of the proposed project will or may be on cultural resources, and how they will be mitigated.

As we discussed in person, Tony is expecting and planning to be involved in the Phase IB Workplan

formulation, and to monitor the archeological work including any borings conducted under that workplan to determine 1) the extent to which the project has the potential to encounter or impact natural (undisturbed soils); 2) the archeological sensitivity of those undisturbed areas; and 3) the potential for the presence of cultural resources including human remains in those areas. And, as we discussed, we understand Tony will be actively involved in and consulted regarding the formulation of the MOA or Programmatic Agreement for this project. Any information you can provide about the schedule for the development of these documents would be greatly appreciated.

#### **Draft Section 4(f) Evaluation**

The Draft Section 4(f) Evaluation required in accordance with 49 U.S.C. 303 does not contain any discussion of the potential project impacts on archeological sites in the area potentially impacted by the I-81 Viaduct Project. 23 CFR Sec. 774.11(f) provides "(f) Section 4(f) applies to all archeological sites on or eligible for inclusion on the National Register, including those discovered during construction, except as set forth in §774.13(b)." Note that 23 CFR Sec. 774.13(b) provides an exception only for those sites where the archeological value is determined by FHWA to be minimal, and where the officials with jurisdiction over the resource have been consulted and have not objected to such determination.

Here, where no adequate investigation has occurred and no documentation about the potential for encountering such sites has been provided, it appears to be premature for FHWA and NYSDOT to make the determination required by Section 4(f).

#### **Phase IA Archeological Assessment**

The Phase IA Archeological Assessment provided to us is labeled "Redacted Version—November 2016". The document indicates on p. 29 that "more detailed descriptions of the NYSM sites within the APE are provide in the copy of the Phase IA report provided to NYSOPHRP and the Onondaga Nation but have been redacted from this report. Presumably this refers to the draft copy which we were previously provided with? Reviewing the portion of the document on behalf of the Nation without a current copy of this map is difficult, and even that map, is of such a scale as to make review extremely difficult.

As requested previously, please provide maps printed at an easily legible scale of the impact footprints of all construction related impacts, including the prospective impacts due to diversion routes and detours, the possible new railroad bridge anticipated by the Community Grid alternative. Overlays of these maps with the archeological sensitivity maps and the identification of undisturbed/natural soils would be extremely helpful in advancing the consultation with respect to this project. We do note with appreciation the effort has clearly made to incorporate the Nation's concerns, including in the maps (as indicated by the caption; unfortunately because we did not have the full copy it wasn't possible to see some of those changes).

The Nation's overwhelmingly strong preference is to avoid disturbing human remains, and this still needs to be unequivocally accounted for in the project documentation. The preference for avoidance means that should human remain s be encountered during construction through inadvertent excavation, all construction will need to stop, so that the Nation can be consulted and measures designed and taken to avoid disturbing the remains. Remains must not be excavated or moved. Remains must be protected from compression damage.

At present the report acknowledges this strong preference in the first bulleted item on p. 233 under Cemeteries and Potential for Human Burials, by noting that future archeological and/or construction monitoring will be conducted in accordance with the OPRHP's Human Remains Discovery Protocol, Haudeosaunee Protocol and Policy on Human Remains, and NAGPRA. It is important to note that those documents generally speak not to the process of monitoring, but specify protocols upon discovery. A clear statement is needed of intent not to disturb or move human remains during or as a result of construction.

We note with appreciation that throughout the document the term Onondaga Nation appears to have been substituted for the term "Onondaga Indians" as we requested in our earlier comments.

### **Conclusion**

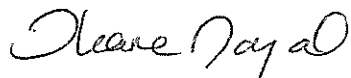
We appreciate that the document has been revised to acknowledge and account for the tremendous importance of doing as much archeological investigation prior to initiation of construction as possible, by acknowledging the need for a Phase IB Archeological Survey to identify the potential for undisturbed soils. Please also add to the Phase IA a clear statement of intent to avoid any human remains inadvertently encountered during construction.

As we have discussed, this Phase IB investigation is important to pursue whether or not the area to be investigated is currently accessible or is currently under pavement or other impervious surface, and it is of critical importance to ensure identification of human remains prior to final project design to avoid delays due to inadvertent discovery of human remains during construction. Tony looks forward to being involved in the review of the workplan and monitoring of the Phase IB work.

Finally, given that much of the detail around the evaluating any adverse impacts from construction on cultural resources will be worked out through negotiation of the programmatic agreement for this project between NYSDOT, FHWA and OPRHP, we look forward to continued discussion and involvement in that process.

Thank you very much for your consideration and attention.

Sincerely,

— 

Thane Joyal, Esq.

Cc: Joseph Heath, Esq. General Counsel, Onondaga Nation  
Tony Gonyea, Onondaga Nation  
Jessica Prockup, NSYDOT  
Dan Hitt, NYSDOT  
Nancy Herter, NYSOPRHP





## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**MATTHEW J. DRISCOLL**  
Commissioner

**Cathy Calhoun**  
Chief of Staff

May 19, 2017

Faithkeeper Anthony Gonyea  
DYODIHWASNYE'NHA  
Administration Building  
4040 Route 11  
Onondaga Nation  
Via-Nedrow, NY 13120

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
OPRHP 16PR06314

Dear Mr. Gonyea:

Thank you for the November 14, 2016 letter from Ms. Thane Joyal, Esq., providing comments from the Onondaga Nation on the *Phase IA Archaeological Sensitivity Assessment* for the I-81 Viaduct Project ("the Project"). The Federal Highway Administration (FHWA) has also shared the letter from Ms. Joyal dated March 1, 2017, with comments on the Pre-Draft Design Report/ Draft Environmental Impact Statement (DEIS) for the Project.

In response, the New York State Department of Transportation (NYSDOT), in coordination with FHWA, would like to provide updated information and clarification of next steps as part of the continuing consultation for the Project in accordance with Section 106 of the National Historic Preservation Act.

The Phase IA study (September 2016) presented information about the physical, environmental, and cultural setting of the Project's location, serving as the context for the archaeologists' assessment of sensitivity. This information was provided to the Onondaga Nation early in the project development process as an opportunity to express your views on the identification of sensitive areas and potential resources prior to refining the design of the Project alternatives or initiating archaeological fieldwork.

Based on the November 2016 and March 2017 correspondence, the Project team has considered your questions regarding the vertical APE, proposed methods of archaeological investigation, known site information, mapping, and procedures in the event that human remains are encountered during construction. These topics have been taken into account in the development of the *Phase IB Archaeological Survey Work Plan: I-81 Viaduct Project*, and the appropriate information is being incorporated in the Work Plan as the next step in the identification of archaeological resources within the APE.

### *Vertical APE*

The vertical APE was not known at the time the Phase IA report was prepared. Since that time, the project design has continued to advance, and additional detail is now available regarding the anticipated depth of soil disturbance for each of the two Build (Viaduct and Community Grid) alternatives presented in the DEIS for the Project. Based on currently available information, the design engineering team has estimated the potential depth of soil disturbance associated with various construction activities throughout the APE for Direct Effects. Maps showing the anticipated depth of disturbance are being prepared and will be included in the Phase IB Work Plan.

- All areas within the APE for Direct Effects were first designated as having the potential for disturbance to a minimum depth of 0 to 2 feet (0 to 61 cm) below the ground surface.
- Using the preliminary project plans for each alternative, the design engineer delineated approximate areas within the APE for Direct Effects of each project Alternative where proposed construction and/or demolition is expected to cause soil disturbance beyond a depth of 2 feet, including construction and/or relocation of underground utilities, sewers, bridge supports, and new highway right-of-way.
- Anticipated depths of disturbance will not be mapped for those areas characterized by previous cut and fill disturbance from the original construction of existing highway structures and embankments. As described in the Phase 1A report, the extent of previous disturbance in these areas eliminates any possibility for archaeological sensitivity.

### *Phase IB Field Investigations*

The assessment of archaeological sensitivity and development of historic contexts provided the basis for a preliminary identification of potential resource types. The appropriate methods for Phase 1B archaeological investigations within the APE are variable and dependent on the archaeological sensitivity of different portions of the APE, the extent of prior ground disturbance, the anticipated depth of soil disturbance, and logistical considerations associated with the existing land uses and timing of construction activities throughout the APE.

The *Phase IB Archaeological Survey Work Plan*, currently under development, will build upon the information and analyses in the Phase IA report to provide a more detailed description of field methods for subsurface testing to determine the presence or absence of archaeological sites within the portion of the APE associated with direct effects. Prior to the start of construction, archaeological fieldwork will be conducted through a combination of shovel testing and machine-aided excavation in areas of sensitivity, to investigate locations where the anticipated depth of project impacts (the vertical APE) will occur in undisturbed soils, or will exceed the depth of previous disturbance. Shovel tests will be excavated in unpaved areas and/or where deep fill



deposits are not documented or anticipated. In locations where the anticipated depth of impact is greater than two (2) feet, machine-aided excavation will be used to determine if natural soils are present beneath fill deposits.

Archaeological monitoring during construction will be limited to portions of the APE that are currently inaccessible due to pavement and other impervious surfaces associated with existing transportation facilities, buildings or structures. For these locations, monitoring during construction is the only feasible and practical method of archaeological investigation that accommodates the presence of existing pavement and utilities, safety issues, and the need to maintain the existing public roadways and services. In general, archaeological monitoring is planned where the proposed depth of construction is anticipated to be greater than two (2) feet, and where there is a potential for significant archaeological resources to be present.

#### *Archaeological Site Inventory Forms and Mapping*

In response to concerns about known archaeological sites, Section 2.2 of the *Phase 1A Archaeological Sensitivity Assessment* report includes a tabular inventory of previously reported archaeological sites within 0.5-mile of the APE for Direct Effects. These include sites listed in the New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP) archaeological site inventory and the New York State Museum (NYSM) archaeological site files. In addition, the Phase 1A report describes (in greater detail) those sites located within or adjacent to the APE for Direct Effects (i.e., within 500 feet of the APE for Direct Effects).

Enclosed for your information are PDF copies of the NYSOPRHP archaeological site inventory forms, as well as the available descriptions of the NYSM sites listed in the report in tabular format. There is no additional information for these sites. For those sites that were listed in Arthur Parker's (1922) *Archaeological History of New York State*, references to the applicable page numbers of site identifiers in Parker's text are included in Tables 2.2-1 and 2.2-2 of the Phase 1A report.

Maps 3 and 11 in Appendix A of the Phase 1A report include the locations of the previously reported archaeological sites within and adjacent to (i.e. within approximately 500 feet of) the APE for Direct Effects. Map 3 depicts these sites relative to the locations of prior archaeological surveys. Enclosed are revised maps that show the locations of previously identified archaeological sites relative to the APE for Direct Effects for the Viaduct and Community Grid Alternatives, to clarify the locations of previously reported sites relative to each Build Alternative and to supplement the information that was included in the Phase 1A Archaeological Sensitivity Assessment.

#### *Human Remains*

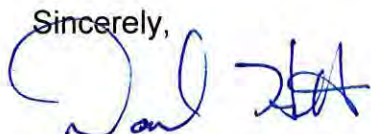
Archaeological investigations to determine the potential presence of human remains will be carried out through a combination of field methods, including subsurface examination in advance of construction, and archaeological monitoring of construction

activities in currently inaccessible locations. The Phase IB Work Plan will outline a sampling strategy that prioritizes areas where there is a potential for human remains to be present. To address the Nation's concerns, the historic alignment of Onondaga Creek has been mapped with a 50 foot buffer and depicted among the areas that are considered archaeologically sensitive due to the potential for buried human remains.

In response to concerns regarding the potential discovery of human remains during construction, established protocols will be included in the Phase IB Work Plan: *NYSDOT Procedures in the Event of the Inadvertent Discovery of Human Remains during Construction*; the *NYSOPRHP Human Remains Discovery Protocol* and the *Haudenosaunee Protocol for Handling Discovery of Human Remains*. The NYSDOT procedures were developed in coordination with the New York State Historic Preservation Office (SHPO), and are consistent in calling for an immediate suspension of construction activity, protection of the discovered remains, notification to the SHPO and Native American representatives, and consultation to determine an appropriate treatment.

The *Draft Phase IB Archaeological Survey Work Plan* for the I-81 Viaduct Project will be provided to you in advance of the consultation meeting scheduled for May 31, 2017. We anticipate the Work Plan will address many of the issues summarized in this letter, and provide a more detailed description of the strategy for archaeological investigations.

If you have any questions concerning the provided information or next steps, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA, we look forward to continuing consultation for this project.

Sincerely,  


Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms

Encl: NYSOPRHP Archaeological Site Inventory Forms  
Archaeological Site File Records (table)  
Archaeological Site Maps (February 6, 2017)

cc: Chief Irving Powless, Jr., Onondaga Nation  
Thane Joyal, Esq.  
Mark Frechette, NYSDOT  
Jon Adams, NYSDOT  
Nancy Herter, NYSOPRHP/SHPO  
Robert Davies, FHWA-NY  
Patricia Millington, FHWA-NY





## Department of Transportation

ANDREW M. CUOMO  
Governor

MATTHEW J. DRISCOLL  
Commissioner

Cathy Calhoun  
Chief of Staff

June 7, 2017

Faithkeeper Anthony Gonyea  
DYODIHWASNYE'NHA  
Administration Building  
4040 Route 11  
Onondaga Nation  
Via-Nedrow, NY 13120

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
*Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring  
During Construction Including Data Recovery*  
OPRHP 16PR06314

Dear Mr. Gonyea:

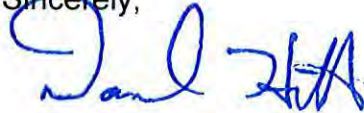
As part of continuing consultation between the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the New York State Department of Transportation (NYSDOT), and the Federal Highway Administration (FHWA) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800), the NYSDOT is transmitting to the Onondaga Nation the *Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* (Draft Work Plan) for the I-81 Viaduct Project. A copy of this report has also been transmitted to the SHPO and the FHWA.

The *Phase IA Archaeological Sensitivity Assessment* (September 2016) established the potential presence of archaeological resources within the project's Area of Potential Effects (APE) and identified areas of archaeological sensitivity, in consultation with the SHPO and Onondaga Nation. Following the completion of the Phase IA study, a vertical APE has been defined in association with the anticipated depth of various construction activities. Based on existing conditions, archaeological sensitivity, and proposed depth of disturbance, the Draft Work Plan describes methods for subsurface testing to determine the presence or absence of archaeological sites within the portion of the APE for direct effects.

The NYSDOT is providing the Draft Work Plan for your review and discussion at the Section 106 Consultation Meeting scheduled for June 13, 2017. At that time, we hope to address any questions regarding the proposed methods and procedures for archaeological survey. In addition, we invite you to provide written comments on the Draft Work Plan by July 10, 2017.

If you have any questions or would like additional information, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA in coordination with the NYSDOT, thank you for taking part in Section 106 consultation for this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel Hitt", with a stylized flourish at the end.

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/jp/bb

Encl: I-81 Viaduct Project – *Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery*  
(1 hard copy and 3 electronic copies in .pdf format on CD)

cc: Chief Irving Powless, Jr., Onondaga Nation (w/encl)  
Thane Joyal, Law Offices of Joseph Heath, Onondaga Nation (w/ electronic encl)  
Steve Thomas, Onondaga Nation (w/ electronic copy)  
John Bonafide, NYSOPTHP/SHPO (w/out encl)  
Nancy Herter, NYSOPRHP/SHPO (w/out encl)  
Robert Davies, FHWA (w/out encl)  
Patricia Millington, FHWA (w/ encl)  
Chris Wilson, Advisory Council on Historic Preservation (w/out encl)  
Mark Frechette, Project Director, NYSDOT (w/out encl)  
George Doucette, Project Manager, NYSDOT (w/out encl)  
Jonathan Adams, NYSDOT (w/out encl)





June 7, 2017

John Bonafide  
Director, Bureau of Technical Preservation Services  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
P.O. Box 189 - Peebles Island State Park  
Waterford, New York 12188-09

**UPLOADED VIA CRIS**

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
*Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring  
During Construction Including Data Recovery*  
OPRHP 16PR06314

Dear Mr. Bonafide:

As part of continuing consultation between the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the New York State Department of Transportation (NYSDOT), and the Federal Highway Administration (FHWA) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800), the NYSDOT is transmitting to SHPO the *Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* (Draft Work Plan) for the I-81 Viaduct Project. A copy of this report has also been transmitted to the Onondaga Nation.

The *Phase IA Archaeological Sensitivity Assessment* (September 2016) established the potential presence of archaeological resources within the project's Area of Potential Effects (APE) and identified areas of archaeological sensitivity, in consultation with the SHPO and Onondaga Nation. Following the completion of the Phase IA study, a vertical APE has been defined in association with the anticipated depth of various construction activities. Based on existing conditions, archaeological sensitivity, and proposed depth of disturbance, the Draft Work Plan describes methods for subsurface testing to determine the presence or absence of archaeological sites within the portion of the APE for direct effects.

The NYSDOT is providing the Draft Work Plan for your review and discussion at the Section 106 Consultation Meeting scheduled for June 13, 2017. At that time, we

hope to address any questions regarding the proposed methods and procedures for archaeological survey. In addition, we respectfully request your written comments on the *Draft Plan for Phase IB Archaeological Monitoring During Construction Including Data Recovery Work Plan* by July 10, 2017.

If you have any questions or would like additional information, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA and the NYSDOT, we look forward to continuing consultation with the SHPO for this project.

Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/jp/bb

Encl: I-81 Viaduct Project – *Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery*

cc: Nancy Herter, NYSOPRHP/SHPO (w/ encl)  
Robert Davies, FHWA (w/ encl)  
Patricia Millington, FHWA (w/out encl)  
Chris Wilson, Advisory Council on Historic Preservation (w/encl)  
Mark Frechette, Project Director, NYSDOT (w/ encl)  
George Doucette, Project Manager, NYSDOT (w/ encl)  
Jonathan Adams, NYSDOT (w/ encl)





# Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

July 19, 2017

Ms. Jessica Prockup  
Environmental Specialist II  
NYS DOT  
50 Wolf Road  
Albany, NY 12232

Re: FHWA  
Interstate 81 (I-81) Viaduct Project PIN 3501.60  
I-81 Viaduct Project, City of Syracuse, Towns of Salina, Cicero, and Dewitt  
Onondaga County  
16PR06314

Dear Ms. Prockup:

Thank you for requesting the comments of the New York State Historic Preservation Office (SHPO). We have reviewed the *Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery (Plan)*, prepared by edr and dated May 2017, in accordance with Section 106 of the National Historic Preservation Act of 1966. The SHPO would like to note that this Plan is well thought out and organized.

Based on this review, the SHPO concurs with the proposed Phase IB archaeological survey, archaeological monitoring and Phase III Data Recovery recommendations and requests that the Plan be revised to address the following minor comments.

- It is noted in Section 3.1.2 that testing is for the purpose of identifying significant archaeological sites in previously disturbed areas. Please elaborate on why testing is necessary in disturbed areas.
- In Section 3.1.2, it is unclear how many soil samples will be screened. The SHPO recommends that a soil sampling interval be specified such as 5m or 7.5m since some of the trenches may be as long as 15m.
- On page 22 the first sentence includes the phrase "resource". It is unclear if this phrase means an archaeological feature or site. Please clarify.

The SHPO looks forward to receiving a copy of the final Plan. If you have any questions, I can be reached at (518) 268-2179.

---

## Division for Historic Preservation

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [www.nysparks.com](http://www.nysparks.com)

Sincerely,

A handwritten signature in black ink that reads "Nancy Herter". The signature is written in a cursive style with a large, stylized 'N' and 'H'.

Nancy Herter  
Archaeology Unit Program Coordinator  
e-mail: [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov)

---

**Division for Historic Preservation**

P.O. Box 189, Waterford, New York 12188-0189 • (518) 237-8643 • [www.nysparks.com](http://www.nysparks.com)

**From:** Thane Joyal [<mailto:thanejoyal@gmail.com>]

**Sent:** Sunday, July 23, 2017 2:21 PM

**To:** Prockup, Jessica (DOT) <[Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov)>

**Cc:** Millington, Tricia (FHWA) <[patricia.millington@dot.gov](mailto:patricia.millington@dot.gov)>; Davies, Robert (FHWA) <[Robert.Davies@dot.gov](mailto:Robert.Davies@dot.gov)>; Hitt, Dan (DOT) <[Dan.Hitt@dot.ny.gov](mailto:Dan.Hitt@dot.ny.gov)>; Adams, Jon (DOT) <[Jon.Adams@dot.ny.gov](mailto:Jon.Adams@dot.ny.gov)>; Herter, Nancy (PARKS) <[Nancy.Herter@parks.ny.gov](mailto:Nancy.Herter@parks.ny.gov)>; [steve.thomas808@yahoo.com](mailto:steve.thomas808@yahoo.com); Joseph Heath <[jjheath1946@gmail.com](mailto:jjheath1946@gmail.com)>; Alma Lowry <[alma.lowry@gmail.com](mailto:alma.lowry@gmail.com)>

**Subject:** Re: I-81 Viaduct Project: Draft Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery

**ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.**

Dear Jessica,

I am very sorry for the delay. Overall the document appears to have substantially accounted for the concerns we have raised in previous comments and discussed in our meetings. It does appear that a few clarifications would be helpful, as noted specifically below in the specific comments.

These clarifications address two basic points:

1. Please modify the document to provide that a representative from the Onondaga Nation will be given the opportunity to be present for the shovel and mechanical testing and to observe and participate in any monitoring during construction.
2. Please modify the document so that the procedures to be followed in the event human remains are encountered, as described in Section V, are referenced through-out, as noted below, to ensure that there is no confusion. The discussion of Phase III data recovery is particularly concerning in that it does not specifically acknowledge that data recovery is inappropriate for human remains and funerary objects, and that avoidance might be required. This omission might lead a lay reader to misunderstand the correct procedures to be followed in the case of an inadvertent discovery. Even a parenthetical reference would be helpful and reassuring.

Specific comments on report language:

#### 3.1 Archeological Field Methods.

- Page 10. Second full paragraph should, as discussed in item 2 above, clarify that in the event human remains are encountered, the protocols specified in Section V will be followed.

#### 3.1.1 and 3.1.2 Shovel Testing and Mechanical Testing.

- Pages 11 and 13. Both sections 3.1.1 and 3.1.2 should refer to the procedures that will be followed in the event human remains are encountered.

#### 3.1.3 Archeological Monitoring During Construction.

- Page 18. Para 2. Insert language indicating that in addition to notifying NYSDOT in the event human remains are encountered, that Tony Gonyea ([315-952-3109](tel:315-952-3109)) of the Onondaga Nation will be contacted as well as the Onondaga Nation's General Counsel Joseph Heath ([315-475-2559](tel:315-475-2559)).
- Page 19. What happens if a work stoppage of 1-4 hours is not adequate to assess the material found? Please specify that the Onondaga Nation representative present on-site may in consultation with the archeologist, request that additional time for assessment be provided.
- Page 20. Given the emphasis on the short time frames, it is important to clarify that these do not apply if it appears that human remains are or may be present in the excavation.
- Page 20. It is important that the document acknowledge that data recovery is not appropriate in the event human remains are discovered.

#### 4.2 Contractor Assistance and Considerations

Pages 22 & 23. The lists for Archeological Monitoring and Contractor General Considerations on p. 22 and for Construction Contractor Responsibilities on p. 23 should be modified to add the responsibility to cease construction pending consultation with the Onondaga Nation as provided in Section V in the event of the discovery of human remains.

Please contact Tony Gonyea at [315-952-3109](tel:315-952-3109) well in advance of any planned field work to discuss arrangements for him or another representative of the Nation to monitor the archeological work, including arrangements for reimbursement of costs and fees associated with the monitoring. If you are unable to reach Tony directly, you may contact me, Stephen Thomas, or the Nation's General Counsel Joseph Heath both of whom are copied above.

Thank you for your consideration and assistance with these concerns.

Sincerely,  
-Thane Joyal



September 14, 2017

**UPLOADED VIA CRIS**

John Bonafide  
Director, Technical Preservation Services Bureau  
Agency Historic Preservation Officer  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
P.O. Box 189 - Peebles Island State Park  
Waterford, New York 12188-09

RE: PIN 3501.60 I-81 Viaduct Project (16PR06314)  
City of Syracuse  
Onondaga County  
Phase IA Archaeological Sensitivity Report CRIS Submission

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is submitting via the Cultural Resource Information System (CRIS), the *Phase IA Archaeological Sensitivity Report for the I-81 Viaduct Project* (September 2016) to the New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act, as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties*.

As you know, the CRIS was not functioning properly when the NYSDOT originally submitted the *Phase IA Archaeological Sensitivity Report for the I-81 Viaduct Project* in September 2016. Please note that this report has not been revised and does not include any new information not previously reviewed by the SHPO. The purpose of this submission is to update the CRIS with the information previously provided as a hardcopy document to the SHPO on September 19, 2016. The Phase IA report was also transmitted to the FHWA and the Onondaga Nation at that time.

On September 22, 2016, the SHPO concurred with the Phase IB archaeology testing and reporting recommendations contained in the Phase IA report. The Onondaga Nation conveyed comments on the report in a letter dated November 14, 2016. In response to the Nation's concerns, the NYSDOT provided updated information and clarification of next steps in a letter dated May 19, 2017, and through the development

of a *Draft Plan for Phase IB Archeological Survey and Archaeological Monitoring During Construction Including Data Recovery*. These letters and the draft Phase IB Work Plan are already in the CRIS.

If you have any questions or would like additional information, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or 518-417-6642.

Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/ms/bb

Att: *Phase IA Archaeological Sensitivity Report for the I-81 Viaduct Project (September 2016)*

cc: (w/out attachment)  
N. Herter, SHPO (e-mail)  
R. Davies, FHWA NY Division  
T. Millington, FHWA NY Division (e-mail)  
M. Frechette, NYSDOT (e-mail)





September 25, 2017

**UPLOADED VIA CRIS**

John Bonafide  
Director, Technical Preservation Services Bureau  
Agency Historic Preservation Officer  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
P.O. Box 189 - Peebles Island State Park  
Waterford, New York 12188-09

RE: PIN 3501.60 I-81 Viaduct Project (16PR06314)  
City of Syracuse  
Onondaga County  
Architectural Resources Survey Report CRIS Submission

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is submitting via the Cultural Resource Information System (CRIS), the *Architectural Resources Survey: I-81 Viaduct Project* (September 16, 2016) to the New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act, as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties*.

As you know, the CRIS was not functioning properly when the NYSDOT originally submitted the hardcopy of the *Architectural Resources Survey: I-81* in September 2016. Subsequent to the submission of the original document, NYSDOT has submitted supplemental information to the inventory and evaluation of historic properties in the letters dated November 21, 2016 and December 21, 2016. Please note that this current submission contains the information found in the original *Architectural Resources Survey* and the two letters and does not include any new information not previously reviewed by the SHPO. The purpose of this submission is to update the CRIS with the information previously provided to the SHPO in 2016.

On September 22, 2016, the SHPO concurred with recommendations for properties previously listed NRE and the addition of 26 properties being determine NRE. The SHPO also found additional newly identified properties from the report met the National Register eligibility criteria. After further clarification in the two letters dated November

21, 2016 and December 21, 2016 the numbers of properties have been recalculated and the revised table documents 695 inventoried building and structures within the project APE including three Historic Districts and 82 individually eligible or listed properties on the National Register of Historic Places. These letters and the table are already in the CRIS.

If you have any questions or would like additional information, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Hitt".

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/jp

Att: *Architectural Resource survey: I-81 Viaduct Project* (September 16, 2016)

cc: (w/out attachment)

N. Herter, SHPO (e-mail)  
R. Davies, FHWA NY Division  
T. Millington, FHWA NY Division (e-mail)  
M. Frechette, NYSDOT (e-mail)  
J. Adams, NYSDOT (e-mail)





## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

October 2, 2017

Ms. Jessica Prockup  
Environmental Specialist II  
NYS DOT  
50 Wolf Road  
Albany, NY 12232

Re: FHWA  
Interstate 81 (I-81) Viaduct Project PIN #3501.60  
I-81 at 690, Syracuse, NY  
16PR06314

Thank you for uploading the *Phase IA Archaeological Sensitivity Assessment I-81 Viaduct Project Report*, prepared by EDR and dated September 2016, to the State Historic Preservation Office's Cultural Resource Information System (CRIS). We have no questions or concerns regarding this document.

If you have any questions, I can be reached at (518) 268-2179.

Sincerely,

Nancy Herter  
Archaeology Unity Program Coordinator  
e-mail: [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov)



October 10, 2017

**UPLOADED VIA CRIS**

John Bonafide  
Director, Technical Preservation Services Bureau  
Agency Historic Preservation Officer  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
P.O. Box 189 - Peebles Island State Park  
Waterford, New York 12188-09

RE: PIN 3501.60 I-81 Viaduct Project (16PR06314)  
City of Syracuse  
Onondaga County  
*Plan for Phase IB Archaeological Survey and Archaeological Monitoring During  
Construction including Data Recovery*

Dear Mr. Bonafide:

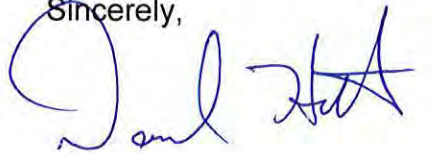
The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is submitting via the Cultural Resource Information System (CRIS), the final *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery* (Plan), prepared for the I-81 Viaduct Project, to the New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act, as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties*.

The Plan was previously provided to the SHPO and the Onondaga Nation as a draft in May 2017. The SHPO provided comments in a letter dated July 19, 2017, concurring with the Phase IB archaeological survey, archaeological monitoring and Phase III Data Recovery recommendations. The Onondaga Nation provided comments by email on July 23, 2017. The final document includes revisions to address the SHPO comments and, at the request of the Onondaga Nation, incorporates additional references to procedures regarding the inadvertent discovery of human remains.

The NYSDOT will implement Phase IB archaeological survey in accordance with the final Plan, starting with shovel testing anticipated to begin later in October 2017.

If you have any questions or would like additional information, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or (518) 417-6642.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Hitt", with a stylized flourish at the end.

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/ms/bb

Encl: *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery*

cc: (w/out attachment)  
N. Herter, SHPO  
R. Davies, FHWA NY Division  
P. Millington, FHWA NY Division  
M. Frechette, NYSDOT





October 10, 2017

Robert Davies, District Engineer  
Federal Highway Administration, NY Division  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

RE: PIN 3501.60 I-81 Viaduct Project (16PR06314)  
City of Syracuse  
Onondaga County  
*Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery*

Dear Mr. Davies:

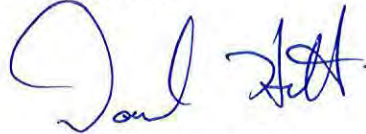
For your information, enclosed is the final *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery* (Plan), prepared for the I-81 Viaduct Project in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). The New York State Department of Transportation (NYSDOT), Office of Environment, is transmitting this Plan to the New York State Historic Preservation Office (SHPO) and the Onondaga Nation.

The draft *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery* was previously provided to the SHPO and the Onondaga Nation as a draft in May 2017. The final document includes revisions to address SHPO comments and, at the request of the Onondaga Nation, incorporates additional references to procedures regarding the inadvertent discovery of human remains.

The NYSDOT is moving forward with the shovel testing based on SHPO's concurrence, in a letter dated July 19, 2017, with the proposed Phase IB archaeological survey, archaeological monitoring and Phase III Data Recovery recommendations as found in the draft *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery*.

If you have any questions or would like additional information, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or (518) 417-6642.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Hitt".

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/ms/bb

Encl: *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery*

cc: (w/out attachment)  
J. Bonafide, SHPO  
P. Millington, FHWA NY Division  
M. Frechette, NYSDOT

October 10, 2017

Ms. Thane Joyal, Esquire  
512 Jamesville Ave.  
Syracuse, NY 13210  
[thanejoyal@gmail.com](mailto:thanejoyal@gmail.com)

RE: PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County  
Phase IB Archaeological Survey Work Plan  
OPRHP Project Review 16PR06314

Dear Ms. Joyal,

Thank you for the comments you provided by electronic mail (email) on July 23, 2017 regarding the *Draft Plan for Phase 1B Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* for the I-81 Viaduct Project. Several specific comments on the report language (with page numbers) and two general comments were included in that correspondence:

- a request to modify the document to provide that a representative from the Onondaga Nation would be given the opportunity to be present for the shovel and mechanical testing and to observe and participate in any monitoring during construction; and
- a request to modify the document so that the procedures to be followed in the event that human remains are encountered, as described in Section 5.0, are referenced throughout the report.

Enclosed please find a copy of the final Phase IB Archaeological Survey Work Plan. Please note that changes addressing comments received from the Onondaga Nation can be found on pages 10, 11, 12, 13, 15, 17, 20, 25, and 26 of the enclosed report. Also, as requested, the Onondaga Nation's General Counsel, Joseph Heath, has been added to the list of *Contact Personnel for I-81 Viaduct Project Archaeological Monitoring During Construction*, attached to the Work Plan as Appendix D.

The Onondaga Nation is hereby invited to have a representative present during the upcoming archaeological fieldwork to be implemented in accordance with the Phase IB



Archaeological Survey Work Plan. Approximately one week prior to the initiation of archaeological fieldwork, the New York State Department of Transportation (NYSDOT) will notify the Onondaga Nation (Thane Joyal, Anthony Gonyea, and Joseph Heath) via email, describing the nature, extent, and timing of the planned fieldwork to the greatest extent practicable. The email will also contain contact information for the appropriate NYSDOT personnel as well as the archaeological contractor who will be conducting the fieldwork. It is currently expected that Phase 1B shovel testing will begin later this month.

We respectfully request that representatives of the Onondaga Nation coordinate with the NYSDOT if you anticipate having a representative present on-site. For safety purposes, coordination with the NYSDOT is necessary for any individuals accessing the State highway rights-of-way. If you have any questions, please contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) or (518) 417-6642.

On behalf of the Federal Highway Administration (FHWA), we appreciate your interest in this Project, and look forward to continuing consultation with the Onondaga Nation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Daniel P. Hitt', is written over the word 'Sincerely,'.

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/jp/bb

Encl: I-81 Viaduct Project Phase IB Archaeological Survey Work Plan (electronic copy)

**cc:** Faithkeeper Anthony Gonyea, Onondaga Nation (w/ hard copy encl.)  
Chief Irving Powless, Jr., Onondaga Nation (w/ hard copy encl.)  
Stephen Thomas, Onondaga Nation (w/ electronic encl.)  
Nancy Herter, NYSOPRHP/SHPO (w/out encl.)  
Robert Davies, FHWA (w/out encl.)  
Patricia Millington, FHWA (w/out encl.)  
Mark Frechette, Project Director, NYSDOT (w/out encl.)



October 30, 2017

Tricia Millington  
Area Engineer  
NY Division Tribal Nation Coordinator  
Federal Highway Administration  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, New York 12207

**RE: REQUEST FOR APPROVAL OF SECTION 106 CONSULTING PARTY  
STATUS  
INTERSTATE 81 (I-81) VIADUCT PROJECT  
CITY OF SYRACUSE, ONONDAGA COUNTY, NEW YORK  
PIN 3501.60**

Dear Ms. Millington:

Please find enclosed for consideration by the Federal Highway Administration (FHWA), a request for Section 106 Consulting Party status for the I-81 Viaduct Project, submitted to the New York State Department of Transportation (NYSDOT) in accordance with 36 CFR Part 800.2(c)(5):

*Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.*

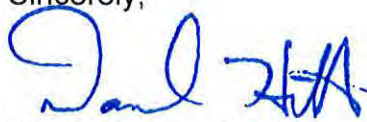
The enclosed request was received by the NYSDOT on July 21, 2017. The NYSDOT Office of Environment, in coordination with the NYSDOT Region 3, has reviewed the enclosed request and recommends that Quante Wright receive Consulting Party status based on his written statement of interest.

We respectfully request FHWA approval of Quante Wright, granting Consulting Party status for participation in the Section 106 process.

If you have any questions, please feel free to contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov).



Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/jp/bb

Encl: Quante Wright Section 106 application

cc: R. Davies, FHWA  
J. Bonafide, OPRHP/SHPO  
C. Wilson, ACHP  
M. Frechette, NYSDOT



## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ROSE HARVEY  
Commissioner

November 3, 2017

Ms. Jessica Prockup  
Environmental Specialist II  
NYS DOT  
50 Wolf Road  
Albany, NY 12232

Re: FHWA  
Interstate 81 (I-81) Viaduct Project  
I-81 at 690, City of Syracuse, Onondaga County, NY  
16PR06314  
PIN 3501.60

The New York State Historic Preservation Office (SHPO) has reviewed the final *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery*, prepared by edr and dated October 2017, in accordance with Section 106 of the National Historic Preservation Act of 1966. These comments are those of the SHPO and relate only to Historic/Cultural resources.

The SHPO is appreciative that all the comments provided in our July 19, 2017 letter were addressed and we have no further concerns with this document.

If you have any questions, I can be reached at (518) 268-2179.

Sincerely,

Nancy Herter  
Archaeology Unit Program Coordinator  
e-mail: [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov)



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

**New York Division**

November 7, 2017

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
New York.FHWA@dot.gov

In Reply Refer To:  
HED-NY

Daniel P. Hitt, RLA  
Director, Office of the Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Subject: PIN 3501.60 – Interstate 81 Viaduct Project  
City of Syracuse, Onondaga County  
Section 106 Consulting Party Status

Dear Mr. Hitt:

We have received your October 30 letter transmitting a request for Section 106 consulting party status on the Interstate 81 Viaduct Project. After reviewing the information contained in the individual request, we have approved the following to be a consulting party to the Section 106 process for the subject project:

- Quante Wright, City of Syracuse resident with expressed concern with the undertaking's effects on historic properties

Consulting party status entitles this individual to share views, receive and review pertinent information, offer ideas and consider possible solutions together with the Federal Highway Administration, NYSDOT and other consulting parties.

If you have any questions, please feel free to contact me at (518) 431-8844.

Sincerely,

Patricia M. Millington  
Area Engineer

cc: M. Lynch, Division Director, NYSHPO  
C. Wilson, Advisory Council on Historic Preservation



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

**New York Division**

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
New York.FHWA@dot.gov

In Reply Refer To:  
HED-NY

September 13, 2018

Mr. Bryan Printup  
Tuscarora Environment Office  
5226 E. Walmore Road  
Tuscarora Nation  
via Lewiston, New York 14092

Subject: Section 106 Consultation  
Interstate 81 Viaduct Project  
City of Syracuse, Onondaga County, NY  
OPRHP Project Review 16PR06314  
PIN 3501.60

Dear Mr. Printup:

The Federal Highway Administration (FHWA) would like to initiate consultation with the Tuscarora Nation for the proposed Interstate 81 (I-81) Viaduct Project, an undertaking subject to Section 106 of the National Historic Preservation Act (NHPA), as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties*. The Project is in the City of Syracuse, Onondaga County, within the area of interest identified by the Tuscarora Nation for Section 106 consultation. Attached, please find the Project Location Map.

The New York State Department of Transportation (NYSDOT), in cooperation with the FHWA, is preparing an Environmental Impact Statement (EIS) for the I-81 Viaduct Project in accordance with the National Environmental Policy Act (NEPA). The Notice of Intent to prepare an EIS for the Project was published in the *Federal Register* on August 26, 2013.

The purpose of the I-81 Viaduct Project is to address the structural deficiencies and nonstandard highway features in the I-81 corridor while creating an improved corridor through the City of Syracuse that meets transportation needs and provides the transportation infrastructure to support long-range planning efforts (i.e., Syracuse Metropolitan Transportation Council Long Range Transportation Plan and Syracuse Comprehensive Plan). The I-81 Viaduct Project objectives that have been established to support the Project's purpose and need 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, 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 EIS will evaluate two Build Alternatives that have been deemed to meet the project purpose and need and are considered feasible and practical based on engineering, cost, and social, economic and environmental considerations. The Viaduct Alternative proposes the rehabilitation or reconstruction of the existing highway; and the Community Grid Alternative proposes conversion of the existing highway to a non-interstate facility.

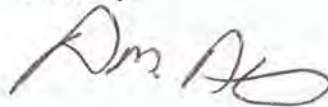
The NYSDOT has initiated Section 106 consultation with the New York State Historic Preservation Office (SHPO), the Onondaga Nation, and other Consulting Parties with an interest in the undertaking's effects on historic properties. The following three reports have been completed and will be provided to you by the NYSDOT under separate cover:

- *Architectural Resources Survey: I-81 Viaduct Project* (September 2016);
- *Phase IA Archaeological Sensitivity Assessment* (September 2016); and
- *The Phase IB Archaeological Survey and Monitoring During Construction Including Data Recovery* (October 2017).

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, pursuant to 36 CFR §800.4(b)(2). The initial stage of archaeological field investigations, Phase IB shovel testing, was completed in November 2017. No pre-contact Native American artifacts or potential cultural features were observed or encountered during the Phase IB shovel testing fieldwork. Preparation of *The Phase IB Archaeological Survey Report* is currently in progress, and the report will be provided for your review and comment when it is complete.

On behalf of the FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the I-81 Viaduct Project. If you have any questions or would like to discuss the Project, please contact me at (518) 431-8880.

Sincerely,

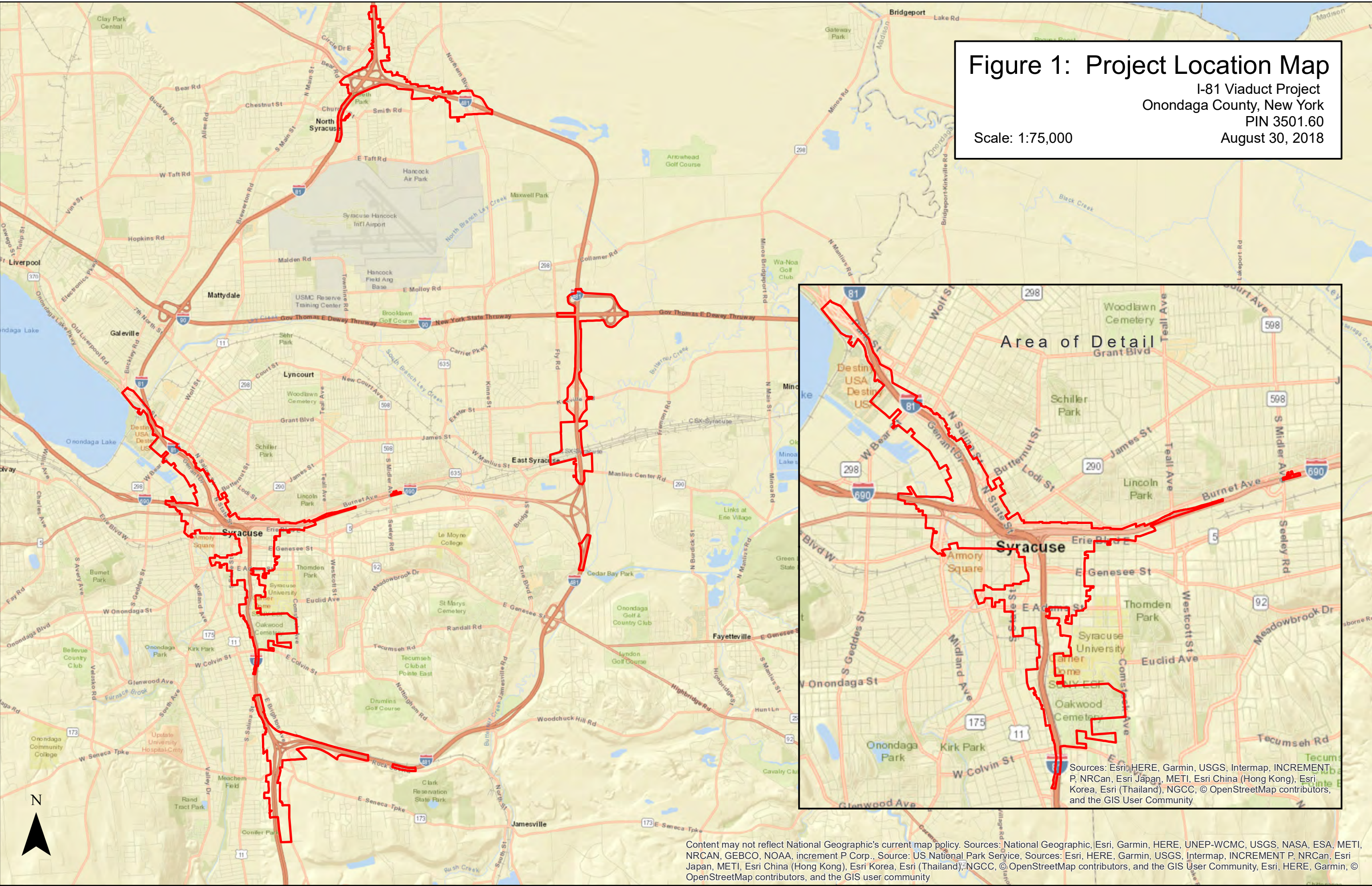


Robert M. Davies  
District Engineer

Encl: Project Location Map

cc: Sarah Stokely, ACHP  
John Bonafide, OPRHP/SHPO  
Nancy Herter, OPRHP/SHPO  
Mark Frechette, Project Director, Region 3, NYSDOT  
Daniel Hitt, Director, Office of Environment, NYSDOT









## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**PAUL A. KARAS**  
Acting Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

September 21, 2018

Robert M. Davies  
District Engineer  
Federal Highway Administration  
New York Division  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, New York 12207

RE: PIN 3501.60  
Request for Approval of Section 106 Consulting Party Status Interstate 81 (I-81)  
Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP Project Review 16PR06314

Dear Mr. Davies:

Please find enclosed for consideration by the Federal Highway Administration (FHWA), a request for Section 106 Consulting Party status for the I-81 Viaduct Project, submitted to the New York State Department of Transportation (NYSDOT) in accordance with 36 CFR Part 800.2(c)(5):

*Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.*

The enclosed request was submitted via e-mail on January 24, 2018. The NYSDOT Office of Environment, in coordination with the NYSDOT Region 3 office, has reviewed the enclosed request and recommends that Douglas Armstrong be granted Consulting Party status based on his written statement of interest.

We respectfully request the FHWA approval of granting Douglas Armstrong Consulting Party status for participation in the Section 106 process.

If you have any questions, please feel free to contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov).

Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/cl/bb

Encl: Douglas Armstrong, Section 106 Consulting Party e-mail request, January 24, 2018

cc: John Bonafide, OPRHP (w/ encl.)  
Mandy Ranslow, ACHP (w/ encl.)  
Mark Frechette, NYSDOT (w/ encl.)



**From:** Douglas V Armstrong [<mailto:dvarmstr@maxwell.syr.edu>]

**Sent:** Wednesday, January 24, 2018 10:13 AM

**To:** Mills, Doug (DOT) <[Doug.Mills@dot.ny.gov](mailto:Doug.Mills@dot.ny.gov)>

**Subject:** Urban Archaeology and Cultural Heritage of the I 81 Corridor - your assistance would be helpful

Doug Mills, NYDOT

Doug - I seek your assistance related to the I-81 corridor in Syracuse. I was given your name by Dr. Holly Norton, one of my former students who is the SHPO Archaeologist for the State of Colorado.

I am an archaeologist at Syracuse University that is part of a group of faculty interested in developing an Urban Archaeology and Heritage that revolves around cultural resource and archaeological planning, mitigation, evaluation, historical ethnography and curation related to I-81 corridor. The University has set up some internal seed grant funding aimed at efforts focusing on developing "smart cities". We are applying for these internal funds so that we can organize efforts aimed at quality heritage based data recovery in the I-81 corridor of the City of Syracuse, an area that centers on but is not restricted to the city's old 15<sup>th</sup> Ward. Our goal would be to position ourselves to be part of the study process for the purpose of generating data on the City's past in a way that will have a positive impact on its future.

We would like to find out the NYDOT procedures for becoming engaged in Section 106 compliance initiatives and how best to become engaged in the planning and research process. Our goal is a high quality data recovery and community based interpretive project that looks in-depth at this area. The freeway was built prior to the passage of the Historic Preservation Act and with the exception of standing architectural structures the area and the many historic and perhaps prehistoric eras of use of the area have never been fully examined. We are modeling our project after work on a current Urban Archaeology project in Detroit; and the successful data recovery and community engagement programs associated with West Oakland (Cyprus Freeway I-880 - overseen by CALTRANS), recent cultural resource studies on I-95 (Delaware DOT), and selected best practices from post Katrina studies of New Orleans (Goodwin and Associates - FEMA); and the City of Indianapolis Indiana...among others.

I have several questions about getting started in this:

How do we gain Consulting Party status from NYDOT for the Section 106 compliance?

1. Who are the lead agencies and what is the chain of communication and decision making?
2. Have any Section 106 reviews been completed? - if so are they accessible
3. Who should we be contacting?

The tentative title of our seed grant proposal (funding from SU) is *Urban Archaeology and Cultural Heritage of the I 81 Corridor: Recovering the Past as We Plan for the Future*.

If done correctly, the I-81 study has the potential to be significant to the City and region.

Thank you for your assistance (a quick brief on archaeology at Syracuse University is below)

Doug

**Douglas Armstrong**, PhD, RPA  
Professor and Chair, Anthropology  
Maxwell School  
209 Maxwell Hall, Syracuse, New York 13244-1020

**cell 315 2430138 (preferred) work 315.443.2405**

[darmstrong@maxwell.syr.edu](mailto:darmstrong@maxwell.syr.edu)  
**Syracuse University**

A bit about Historical Archaeology and local public archaeology at Syracuse: Syracuse University is one of the leading centers of historical archaeology. I teach public policy archaeology and a class on world heritage sites. I am a Past President of the Society of Historical Archaeology and we have four historical archaeologists on our faculty all of whom are also trained in indigenous archaeology. I am a long time member of the Preservation Association of Central New York (with which I served as President and Board members for several years. In the past I have been very active in the city as a past member of the City of Syracuse Landmark Preservation Board (Vice-President) and of the Onondaga Historical Society's board. I also co-authored a book on "Archaeological Sites and Preservation Planning in Central New York" (NYSDPNR 2000), and headed up the study of "Save the Faces" project, which involved an archaeological and historical study of the Wesleyan Methodist Church in Syracuse. As president of PACNY I moved the organization forward with several "Freedom Trail" initiatives, one of which resulted in signage across the city. Most recently, I have been carrying out archaeological and historic studies of the Harriet Tubman Home in Auburn, New York and assisted in the establishment of Harriet Tubman National Historic Park.





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

New York Division

October 4, 2018

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
New York.FHWA@dot.gov

In Reply Refer To:  
HED-NY

Mr. Daniel P. Hitt  
Director, Office of Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Subject: PIN 3501.60 – Interstate 81 (I-81) Viaduct Project, City of Syracuse,  
Onondaga County (OPRHP 16PR06314)

Dear Mr. Hitt:

We have received your September 21 letter requesting our approval of the granting of Mr. Douglas Armstrong Consulting Party Status for participation in the Section 106 process for the subject project. Based on our review of the information provided, we approve Mr. Douglas Armstrong as a member of the Section 106 Consulting Party for this project. Please notify Mr. Armstrong of our approval and his status.

If you have any questions, please contact me at (518) 431-8880.

Sincerely,

Robert M. Davies  
District Engineer

cc: John Bonafide, OPRHP  
Mandy Ranslow, ACHP  
Mark Frechette, NYSDOT Region 3



# Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

WAHID ALBERT, P.E.  
Chief Engineer

July 10, 2019

Dan Kwasnowski, Director  
Syracuse-Onondaga County Planning Agency  
233 E. Washington Street  
Syracuse, NY 13202

**RE: *National Historic Preservation Act, Section 106 Consulting Party Meeting***  
Interstate 81 (1-81) Viaduct Project (PIN 3501.60)  
City of Syracuse, Onondaga County, New York

Dear Mr. Kwasnowski:

As a Section 106 Consulting Party for the Interstate 81 (1-81) Viaduct Project (the "Project"), the New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), cordially invites you to participate in a meeting to be held on Monday, August 12, 2019 from 11:00 a.m. to 12:30 p.m. at the NYSDOT Regional Office, 333 E Washington Street, Syracuse, New York. A map is enclosed for your convenience.

The purpose of this meeting is to engage Consulting Parties in the Section 106 process for the 1-81 Viaduct Project by providing an update on the Project and the current status of Section 106 review. The meeting will provide the Consulting Parties with an opportunity to offer input on the effects to identified historic properties and participate in the consideration of measures to avoid, minimize, or mitigate adverse effects on identified historic properties within the Area of Potential Effect (APE).

Enclosed with this letter is a portable flash drive containing the following documents:

- Justification for the Determination of the APE Boundary;
- Map of the APE;
  - Architectural Resource Survey (September 16, 2016);
- State Historic Preservation Office (SHPO) Concurrence Letter (September 22, 2016);
- Transmittal letter from NYSDOT to SHPO (November 21, 2016) providing supplemental information to the inventory and evaluation of historic properties in the Architectural Resource Survey;
  - SHPO Concurrence Letter (December 7, 2016); and
- Transmittal letter from NYSDOT to SHPO (December 21, 2016) clarifying the status of properties within the APE.

**Please RSVP no later than the close of business on July 19, 2019** by contacting the NYSDOT Main Office: Jessica Prockup, NYSDOT, at (518) 417-6642 or [Jessie .Prockup@dot.ny.gov](mailto:Jessie.Prockup@dot.ny.gov).

If you would like to receive paper copies of the documents noted above, or if you have any questions, please contact Jessica Prockup.

Sincerely,

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/bb

Encl: Flash Drive containing "Section 106 Consultation Package"  
Map to the NYSDOT Regional Office, Syracuse

cc: R. Davies, FHWA (w/ encl.)  
D. Mackay, NYSOPRHP (w/ encl.)  
M. Ranslow, ACHP (w/ encl.)  
M. Frechette, NYSDOT (w/out encl.)





**Department of  
Transportation**

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

July 23, 2019

John Bonafide  
Director, Bureau of Technical Preservation Services  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
Peebles Island State Park - P.O. Box 189  
Waterford, New York 12188-0189

RE: ***National Historic Preservation Act, Phase IB Archaeological Survey: Shovel Testing (OPRHP 16PR06314)***  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT) is submitting the enclosed draft *Phase IB Archaeological Survey: Shovel Testing* for the I-81 Viaduct Project, for review by the New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

The final *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* was previously provided to the SHPO in October 2017.

If you have any questions, please feel free to contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov).

Sincerely,

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/jp/bb

Encl: *Phase IB Archaeological Survey: Shovel Testing*

cc: N. Herter, SHPO (w/o encl.)  
M. Frechette, NYSDOT (w/o encl.)

**From:** Herter, Nancy (PARKS)

**Sent:** Thursday, July 25, 2019 2:19 PM

**To:** Hitt, Dan (DOT) <[Dan.Hitt@dot.ny.gov](mailto:Dan.Hitt@dot.ny.gov)>

**Cc:** Frechette, Mark (DOT) <[Mark.Frechette@dot.ny.gov](mailto:Mark.Frechette@dot.ny.gov)>; Prockup, Jessica (DOT) <[Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov)>; Bonafide, John (PARKS) <[John.Bonafide@parks.ny.gov](mailto:John.Bonafide@parks.ny.gov)>

**Subject:** RE: PIN 3501.60 I-81 Viaduct Project: Letter Transmitting Phase IB Archaeological Report to SHPO

Dan,

I have reviewed the draft *Phase IB Archaeological Survey: Shovel Testing Report* and I have no concerns or comments regarding this report. The SHPO concurs that no additional Phase IB shovel testing is warranted and that the Britton Lime Works Historic Site is not National Register eligible. The report is well-organized and thorough and I look forward to the Section 106 meeting on August 12.

Sincerely,  
Nancy

**Nancy Herter, Ph.D.**

Archaeology Unit Program Coordinator

New York State Parks, Recreation & Historic Preservation

PO Box 189, Peebles Island, Waterford, New York 12188-0189

(518) 268-2179 | [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov)

<https://parks.ny.gov/shpo>



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

WAHID ALBERT, P.E.  
Chief Engineer

August 2, 2019

Mr. Bryan Printup  
Tuscarora Environment Office  
5226 E. Walmore Road  
Tuscarora Nation  
Via Lewiston, NY 14092

RE: **Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Mr. Printup:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting to the Tuscarora Nation materials prepared for the I-81 Viaduct project for consultation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). The following documents are enclosed:

1. The *Phase IA Archaeological Sensitivity Assessment*
2. The *Phase IB Archaeological Survey Work Plan*
3. The *Draft Phase IB Archaeological Survey: Shovel Testing*

The NYSDOT, in coordination with the New York State Historic Preservation Office (SHPO), has established the Project's area of potential effects (APE) along with maps depicting the Project's APE which are included within the *Architectural Resources Survey* document, mailed separately on July 10, 2019. Copies of the enclosed *Phase IA Archaeological Sensitivity Assessment* and the *Phase IB Archaeological Survey Work Plan* reports have been transmitted previously to the SHPO, the FHWA, and the Onondaga Nation.

The objective of the *Phase IA Archaeological Sensitivity Assessment* was to determine whether known archaeological resources are located in the APE, and to evaluate the potential for previously unidentified archaeological resources to be located within the APE. The *Phase 1B Archaeological Survey Work Plan (Work Plan)* describes field methods for subsurface testing to determine the presence or absence of archaeological sites within the portion of the APE associated with direct effects.

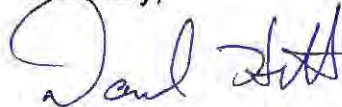


The initial stage of the Phase IB archaeological survey has been completed and a copy of the draft report entitled *Phase IB Archaeological Survey: Shovel Testing* has been transmitted to the SHPO. The SHPO has reviewed the document, has no concerns or comments regarding the report, and concurs with the recommendation that no additional Phase IB shovel testing is warranted. As outlined in the *Work Plan*, the remaining methods for archaeological investigations, mechanical excavation and archaeological monitoring during construction, will be carried out as the project progresses.

The NYSDOT proposes an opportunity to discuss and hear the views of the Tuscarora Nation on the results of archaeological shovel testing at a meeting with the Nations on August 12, 2019 at 2:00 p.m. Following the meeting, the NYSDOT respectfully requests any written comments from the Tuscarora Nation on the draft *Phase IB Archaeological Survey: Shovel Testing* by September 4, 2019.

If you have any questions or would like additional information, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA and in coordination with the NYSDOT, thank you for taking part in Section 106 consultation for this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Hitt".

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/bb

Encl: I-81 Viaduct Project – *Phase IA Archaeological Sensitivity Assessment*  
I-81 Viaduct Project – *Phase 1B Archaeological Survey Work Plan*  
I-81 Viaduct Project – *Draft Phase IB Archaeological Survey: Shovel Testing*

cc: R. Davies, FHWA (w/out encl.)  
P. Millington, FHWA (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

WAHID ALBERT, P.E.  
Chief Engineer

August 2, 2019

Faithkeeper Anthony Gonyea  
DYODIHWASNYE'NHA  
Administration Building  
4040 Route 11  
Onondaga Nation  
Via Nedrow, New York 13120

RE: ***Draft Phase IB Archaeological Survey: Shovel Testing***  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Faithkeeper Gonyea:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting the draft report entitled *Phase IB Archaeological Survey: Shovel Testing*, prepared for the I-81 Viaduct project for review by the Onondaga Nation for consultation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

The final *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* was previously provided to the Onondaga Nation in October 2017.

The initial stage of the Phase IB archaeological survey has been completed and a copy of the draft report entitled *Phase IB Archaeological Survey: Shovel Testing* has been transmitted to the New York State Historic Preservation Office (SHPO). The SHPO has reviewed the document, has no concerns or comments regarding the report, and concurs with the recommendation that no additional Phase IB shovel testing is warranted. As outlined in the *Work Plan*, the remaining methods for archaeological investigations, mechanical excavation and archaeological monitoring during construction, will be carried out as the project progresses.

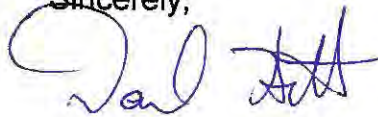
The upcoming meeting with the Nations on August 12, 2019 at 2:00 pm will provide an opportunity for the NYSDOT to discuss and hear the views of the Onondaga Nation on the results of archaeological testing. Following the meeting, the NYSDOT



respectfully requests any written comments from the Onondaga Nation on the draft *Phase IB Archaeological Survey: Shovel Testing* by September 4, 2019.

If you have any questions or would like additional paper or electronic copies, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA, we appreciate your interest in this project, and look forward to continuing consultation with the Onondaga Nation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dan Hitt', is written over the word 'Sincerely,'.

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/jp/bb

Encl: I-81 Viaduct Project – draft *Phase IB Archaeological Survey: Shovel Testing*

cc: Chief S. Hill, Onondaga Nation (w/out encl.)  
A. Lowry, Onondaga Nation (w/ encl.)  
R. Davies, FHWA (w/out encl.)  
P. Millington, FHWA (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)



## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

August 15, 2019

[Recipient Name]  
[Recipient Title]  
[Recipient Company]  
[Recipient Street Address]  
[Recipient City, STATE Zip]

**RE: Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
Draft *Finding Documentation*

Dear [Mr./Ms. Recipient Last Name]:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing the enclosed draft *Finding Documentation* for your review and comment in accordance with Section 106 of the National Historic Preservation Act, as amended, and implementing regulations at 36 CFR Part 800: *Protection of Historic Properties*. Please note the draft *Finding Documentation* includes several attachments, including a supplemental Historic Resources Screening of an amended area of potential effects (APE), and additional information and clarification of previously evaluated properties.

The purpose of the *Finding Documentation* is to evaluate the Project's effects on identified historic properties. Based on archaeological investigations completed to date, no archaeological resources have been identified within the Project's APE at this time. Therefore, the assessment of effects is based on an assessment of the Project's effects on architectural properties (buildings, structures and districts) that are eligible for or listed in the National Register of Historic Places.

The NYSDOT respectfully requests written comments on the draft *Finding Documentation*, including any additional information you may have regarding the buildings listed on the Updated Building Eligibility Assessment Table found in Appendix C of the draft *Finding Documentation* by **September 19, 2019**.

Please contact Jessica Prockup at (518) 417-6642 or [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) if you have questions or would like additional information.

Sincerely,

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/los/ms

Encl: Flash Drive containing draft *Finding Documentation I-81 Viaduct Project*

cc: R. Davies, FHWA NY Division (w/out encl.)  
P. Millington, FHWA NY Division (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
D. Mackay, NYSOPRHP (w/out encl.)  
J. Bonafide, SHPO (w/out encl.)



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

WAHID ALBERT, P.E.  
Chief Engineer

August 15, 2019

Faithkeeper Anthony Gonyea  
DYODIHWASNYE'NHA  
Administration Building  
4040 Route 11  
Onondaga Nation  
Via Nedrow, New York 13120

RE: **Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Faithkeeper Gonyea:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), would like to thank you for participating in the Section 106 Tribal Nations meeting for the I-81 Viaduct Project (Project) on Monday, August 12, 2019. An electronic copy of the draft *Finding Documentation* was distributed to attendees at Section 106 Consulting Parties meetings held on August 12, 2019. To follow up on our meeting, the NYSDOT is transmitting a hard copy of the draft *Finding Documentation*, per your request, and in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

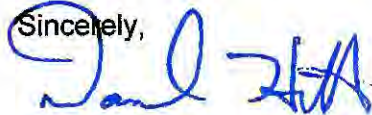
As requested, due to recent staff changes, the NYSDOT is providing additional electronic and hard copies of two reports previously sent for review by the Onondaga Nation: the *Phase 1A Archaeological Sensitivity Assessment* and the *Phase 1B Archaeological Survey Work Plan*.

The *Phase 1A Archaeological Sensitivity Assessment* provides an assessment of the potential presence of archaeological resources within the project's area of potential effects (APE). The Phase 1A report was sent to the Onondaga Nation for review on September 30, 2016. The views and concerns of the Onondaga Nation, expressed by you through a letter from Thane Joyal, dated November 14, 2016, were considered during the development of the *Phase 1B Archaeological Survey Work Plan*. The *Work Plan* builds upon the information and analysis in the Phase 1A report and provides a detailed description of field methods for subsurface testing to determine the presence or absence of archaeological sites within the portion of the APE associated with direct effects. A draft of the *Phase 1B Archaeological Survey Work Plan* was provided to the Onondaga Nation in May 2017. The Onondaga Nation provided comments via a letter from Thane Joyal, dated July 23, 2017. The final *Phase 1B Archaeological Survey Work Plan* incorporated changes to address your comments and was provided to the Onondaga Nation in October 2017.



As discussed at the August 12, 2019 Tribal Nations meeting, the NYSDOT respectfully requests any written comments from the Onondaga Nation on the draft *Phase 1B Archaeological Survey: Shovel Testing* report by **September 4, 2019**. The NYSDOT respectfully requests comments on the draft *Finding Documentation* by **September 19, 2019**. The NYSDOT appreciates your interest in the Project and welcomes hearing your views on the results of the archaeological testing and the draft *Finding Documentation*.

If you have any questions, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA, we appreciate your interest in this project, and look forward to continuing consultation with the Onondaga Nation.

Sincerely,  


Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/bb

Encl: I-81 Viaduct Project – draft *Finding Documentation*  
I-81 Viaduct Project – *Phase 1A Archaeological Sensitivity Assessment*  
I-81 Viaduct Project – *Phase 1B Archaeological Survey Work Plan*

cc: Chief S. Hill, Onondaga Nation (w/out encl.)  
A. Lowry, Onondaga Nation (w/ electronic encl.)  
T. Lee, Onondaga Nation (w/ paper and electronic encl.)  
R. Davies, FHWA (w/out encl.)  
P. Millington, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
D. Mackay, NYSOPRHP/SHPO (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)





## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

August 16, 2019

Mr. Bryan Printup  
Tuscarora Environment Office  
5226 E. Walmore Road  
Tuscarora Nation  
Lewiston, NY 14092

RE: **Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Mr. Printup:

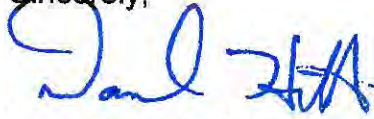
The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting to the Tuscarora Nation an electronic copy of the draft *Finding Documentation* prepared for the I-81 Viaduct Project for consultation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). An electronic copy of the draft *Finding Documentation* was distributed to attendees at Section 106 Consulting Parties meetings held on August 12, 2019.

The purpose of the *Finding Documentation* is to evaluate the Project's effects on identified historic properties. Based on archaeological investigations completed to date, no archaeological resources have been identified within the Project's APE at this time. Therefore, the draft document summarizes an assessment of the Project's effects on architectural properties (buildings, structures and districts) that are eligible for or listed in the National Register of Historic Places.

The NYSDOT respectfully requests any written comments from the Tuscarora Nation on the draft *Finding Documentation* by **September 19, 2019**.

If you have any questions or would like additional information or a hard copy of this document, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or (518) 417-6642. On behalf of the FHWA, thank you for taking part in Section 106 consultation for this project.

Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/bb

Encl: Flash Drive containing draft *Finding Documentation I-81 Viaduct Project*

cc: R. Davies, FHWA (w/out encl.)  
P. Millington, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
D. Mackay, NYSOPRHP/SHPO (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)





**Department of  
Transportation**

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

August 16, 2019

Mandy Ranslow  
Program Analyst  
Advisory Council on Historic Preservation  
FHWA Liaison  
401 F Street, NW  
Washington, D.C. 20001-2637

**RE: Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
Draft *Finding Documentation*

Dear Ms. Ranslow:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), would like to thank you for participating via WebEx in the Section 106 Consulting Parties meetings for the I-81 Viaduct Project (Project) on Monday, August 12, 2019. An electronic copy of the draft *Finding Documentation* was distributed to attendees at Section 106 Consulting Parties meetings held on August 12, 2019. To follow up on our meetings, the NYSDOT is transmitting an electronic copy of the draft *Finding Documentation* and the draft *Phase 1B Archaeological Survey: Shovel Testing*, per your request, and in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

Following the documentation standards outlined in 36 CFR 800.11(e), the draft *Finding Documentation* evaluates the Project's effects on identified historic properties, using a phased process to apply the *criteria of adverse effect*, consistent with the phased identification and evaluation efforts being conducted pursuant to 36 CFR §800.4(b)(2). Based on archaeological investigations completed to date, no archaeological resources have been identified within the Project's APE at this time. Therefore, the draft document summarizes an assessment of the Project's effects on architectural properties (buildings, structures and districts) that are eligible for or listed in the National Register of Historic Places.

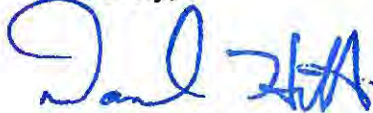
The initial stage of the Phase IB archaeological survey has been completed and a copy of the draft report entitled *Phase IB Archaeological Survey: Shovel Testing* has been transmitted to the Onondaga Nation, the Tuscarora Nation, and the New York State Historic Preservation Office (SHPO). The SHPO has reviewed the document, has no concerns or comments regarding the report, and concurs with the recommendation

that no additional Phase IB shovel testing is warranted. As outlined in the *Phase 1B Archaeological Survey Work Plan*, the remaining methods for archaeological investigations, mechanical excavation and archaeological monitoring during construction, will be carried out as the project progresses.

The NYSDOT respectfully requests written comments on the draft *Finding Documentation* and the draft *Phase 1B Archaeological Survey: Shovel Testing* by **September 19, 2019**.

Please contact Jessica Prockup at (518) 417-6642 or [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov) if you have questions or would like additional information.

Sincerely,



Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/bb

Encl: Flash Drive containing draft *Finding Documentation I-81 Viaduct Project* and draft *Phase 1B Archaeological Survey: Shovel Testing*

cc: R. Davies, FHWA NY Division (w/out encl.)  
P. Millington, FHWA NY Division (w/out encl.)  
D. Mackay, NYSOPRHP/SHPO (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)

**From:** Alma Lowry <[alma.lowry@gmail.com](mailto:alma.lowry@gmail.com)>

**Date:** September 4, 2019 at 1:50:33 PM EDT

**To:** "Millington, Tricia (FHWA)" <[patricia.millington@dot.gov](mailto:patricia.millington@dot.gov)>

**Cc:** Wendy Gonyea <[wendygonyea@yahoo.com](mailto:wendygonyea@yahoo.com)>, Karen F <[karen3farmer@gmail.com](mailto:karen3farmer@gmail.com)>, [Dan.Hitt@dot.ny.gov](mailto:Dan.Hitt@dot.ny.gov)

**Subject: Onondaga Nation Concurrence with I-81 Shovel Test Pit Comments from Tiffany Lee**

*ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.*

Dear Tricia and Dan:

On Monday, September 2, Tiffany Lee, who has been working with Tony Gonyea on the I-81 Viaduct project, submitted several questions and comments on the Draft Phase IB Archaeological Survey Shovel Testing report. Tony Gonyea and I have reviewed those comments and questions and agree with the concerns raised.

Accordingly, the Nation concurs with these questions and comments and adopts those questions as the Nation's formal submission on the Draft Phase IB Archaeological Survey Shovel Testing report.

We look forward to seeing the answers to these questions.

Sincerely,

Alma Lowry

--

Alma Lowry, Of Counsel  
Law Office of Joseph Heath  
General Counsel to the Onondaga Nation



**From:** Tiffany Lee [<mailto:tlee7@hawaii.edu>]  
**Sent:** Monday, September 2, 2019 10:27 PM  
**To:** Millington, Tricia (FHWA) <[patricia.millington@dot.gov](mailto:patricia.millington@dot.gov)>  
**Cc:** [wendygonyea@yahoo.com](mailto:wendygonyea@yahoo.com)  
**Subject:** I-81 Project

Good afternoon Tricia-

I met with you briefly at the last I-81 Viaduct Project meeting this past August. I accompanied members of the Onondaga Nation to the meeting to review the data retrieved during the Shovel Testing stage of the archaeological assessment. As such I have included Wendy Gonyea on this email for their records as well.

I have had a chance to further review the documents you had mailed to me and I wanted to inquire about a few items that need further clarification. First, in the I-81/I-481 North Interchange survey zone, STP N4.01 and N4.02 were labelled undisturbed. N4.01 had two stratigraphic layers recorded (I. 0-29 10YR 2/2; II. 29-49 10YR 5/4), while N4.02 had similar data recorded for the first stratigraphic layer (I. 0-25 10YR 2/2) but a second stratigraphic layer was not recorded. Due to the depth of N4.02 being so shallow, I would like to know why shovel testing was halted at ~25 cmbs.

Secondly, in the I-481 East Improvements survey zone, shovel test pits E3.15 and E3.16 did not have a maximum depth recorded. I would like to know what the maximum depth of excavation for these two shovel tests were and why this data was not recorded.

I would also like clarification for the maximum excavated depth recorded for shovel test pit E5.17 (17cm), when surrounding shovel test pits are more than 30 cm deeper (E5.16: 48cm; E5.18: 53 cm). Why was this shovel test not excavated to a depth that is comparable to the others in the area?

Thirdly, in the I-81/I-481 South Interchange survey zone, the shovel test pit S5.05 exhibited coarse sand with small chert cobbles and was labelled as naturally occurring sediment. However, this is the only shovel test pit with this type of sediment present and would like clarification on why it was determined to be natural without further investigation.

Finally, I would like clarification on why shovel testing was not done at shorter intervals in areas that may have warranted further investigation.

I would like to thank you for your assistance in clarifying these points for me. If you need any clarification on my inquiries, I would be happy to provide you with more details regarding my inquiries.

Best regards-

--

Tiffany Lee  
University of Hawaii



September 11, 2019

To the New York State Department of Transportation:

The Preservation Association of Central New York (PACNY), a Consulting Party in the Section 106 Process for the Interstate 81 Viaduct Project, is pleased to provide the following comments on the *Preliminary Draft Design Report/Draft Environmental Impact Statement* (April 2019). PACNY's mission is to advocate for preservation and viable use of historic resources in the five-county Central New York region.

1. 3.2.3, Community Grid Alternative: PACNY strongly supports the Community Grid Alternative as the best option for minimizing adverse effects on historic resources while enhancing the historic urban fabric of the City of Syracuse. However, PACNY urges DOT to consider extending the project area to the I-81 embankment south of the viaduct, preferably to Brighton Avenue, but at least to Colvin Street. Extending the Community Grid to connect with city streets south of the viaduct through removal of the embankment could have the following benefits to historic resources:
  - a. It would disperse traffic before getting to downtown and avoid having all traffic dump directly into the historic Pioneer Homes complex (see following comments on Historic and Cultural Resources).
  - b. It would help address the economic damage done with the original construction of I-81 that diverted traffic from South Salina Street, and would thereby enhance the viability of National Register-listed and eligible resources including the South Salina Street Historic District, South Presbyterian Church, and the Sears Building.
  - c. It would restore access to the original entrance to National Register-listed, nationally significant Oakwood Cemetery, which was cut-off by the construction of I-81. This highway barrier severed the cemetery from the city and has directly led to ongoing deterioration in the oldest parts of the cemetery due to lack of access and visibility. Providing access to the cemetery along a new boulevard in place of I-81 would provide renewed prominence and relevance to Oakwood Cemetery. In addition, converting I-81 to a lower, slower road would reduce ongoing high levels of noise pollution in the cemetery.
2. 6-4-1.1.4 Identification of Historic Properties:
  - a. PACNY refers to the recommended corrections to the historic properties list provided by the City of Syracuse Preservation Planner.
  - b. PACNY urges DOT and the New York SHPO to reconsider the evaluation of the Pioneer Homes complex as not eligible for listing in the National Register. PACNY believes the complex is historically significant and retains integrity. Similar public housing complexes in Buffalo and elsewhere across the country have been determined eligible for National Register listing and have gone on to be redeveloped using the federal historic tax credits.

- c. Area of Potential Effects (Appendix E-1): The APE should be expanded around the I-81/I-481 interchange and elsewhere along I-481 to address potential secondary effects on historic properties. Historic properties within an expanded APE in this area should include the historic Jewish cemeteries along Jamesville Road in the Town of Onondaga (Workmen's Circle, Anshe Sford, Ahavath Achim, and Chevra Shas). The elevation of the cemeteries on a hillside that faces I-481 could expose them to increased noise and pollution from a busier I-481. In addition, Clark Reservation, a historic New York State Park, and the Old Erie Canal State Historic Park should also be included in the APE for the same reasons.
3. 6-4-1.3.5, Mitigation: Although the Community Grid Alternative will greatly reduce damaging effects of I-81 on circulation, noise levels, and pollution within Syracuse, there will still remain adverse effects from the remaining highway, especially if the embankment section south to Colvin Street is maintained (see prior comment 1-c). PACNY strongly recommends that the past and ongoing effects from the highway be considered in any proposed program of mitigation for the project. Since its construction over 50 years ago, I-81 has had devastating effect on the nationally significant Oakwood Cemetery that has exacerbated the deterioration of the historic landscape, including its vegetation, road system, buildings, and monuments. I-81 has also greatly impacted the viability and use of the oldest section of the cemetery closest to I-81, an area plagued by vandalism and deterioration.

The I-81 Viaduct project has the potential to affect numerous historic resources in the City of Syracuse in a positive way. PACNY looks forward to your agency's consideration of our concerns in the next draft of the Environmental Impact Statement.

Sincerely,

A handwritten signature in blue ink that reads "Cynthia Carrington Carter". The signature is fluid and cursive, with the first name "Cynthia" being the most prominent.

Cynthia Carrington Carter  
Secretary  
Preservation Association of Central New York





12 September 2019

Ms. Jessica L. Prockup  
Environmental Specialist 3  
Environmental Impact Statements & Special Projects Bureau,  
New York State Department of Transportation  
Office of Environment  
50 Wolf Road, POD 4-1  
Albany, NY 12232

The American Institute of Architects  
Central New York

Syracuse Coworks  
201 E. Jefferson St.  
Suite #200  
Syracuse, NY 13202  
T (315) 333 2421

[aiaony@aiaony.org](mailto:aiaony@aiaony.org)  
[www.aiaony.org](http://www.aiaony.org)

Re: FHWA/NYS DOT  
Interstate 81-Viaduct Project /PIN 3501.60  
Section 106 process / Consulting Party comments  
on preliminary DEIS; *SHPO 16PR006314*

Dear Ms. Prockup,

The American Institute of Architects Central New York Chapter is an official Consulting Party in accordance with Section 106 of the National Historic Preservation Act of 1966 and per our letter received from Mr. Daniel Hitt, RLA, Director of the Office of the Environment, NYSDOT and per direction from FHA as lead agency dated January 2015. This current letter is to submit commentary on the preliminary historic resources information supplied to us regarding the above project received July of 2019.

First let us state that we are pleased that NYSDOT has come out in favor of the "Community Grid Alternative" in the preliminary DEIS. This option if sanctioned has the opportunity for the City of Syracuse to undertake revitalization programs for the city as a whole and for these neighborhoods specifically.

We have reviewed the Architectural Resource Survey (Sept. 2016), the supplemental information to the inventory and evaluation of historic properties in the survey transmitted via the letter by NYSDOT (Nov. 2016) and the additional clarification of the status of certain properties within the APE via the NYSDOT letter (Dec. 2016).

Additional information was provided on Monday August 12, 2019 at a meeting of Consulting Parties at the local offices of the NYSDOT in Syracuse. This was the 'DRAFT Finding Document / Section 106 Effect Finding' (Nov. 2018) with the attached supporting materials. This was also provided in the 19 April 2019 - released preliminary DEIS under Appendix E-4.



We do not support the ‘Viaduct Alternative’ due to the required demolition of 10 buildings eligible or listed on the National Historic Register of Historic Places that would be acquired and removed per statements on pg. 16 of the DRAFT finding document.

In particular the loss of the Freight Station adjacent to the Interstate 690 and currently listed on the National Register of Historic Places and as a locally Eligible/ Architecturally Significant site in the City of Syracuse, would be unacceptable since it is part of the whole remaining complex of the ‘former NY Central RR Passenger and Freight Station complex’, 94NR00743.

Another loss would be Peck Hall and Reid Hall which would be demolished and are part of the historic architectural legacy of Syracuse University downtown.

Another proposed demolition of the National Register eligible Syracuse Herald Place building at 212 Herald Place would be a huge mistake. This building recently completed an adaptive reuse project of conversion into apartments under the approval of the National Park Service and the historic preservation tax credit program.

And finally through this review, we find an opportunity to support a local housing development venture still in the planning stage. In considering the unique historic significance of the “Pioneer Homes” complex, we can recommend an advantageous reevaluation of the recent “non-eligible” designation. There is precedent to remove “alterations” to the original complex which could open an additional 40% tax credits [20% federal and 20% state] to this major, city & community-supported housing revitalization project. We believe the “alterations” to the original design can be removed under a possible historic preservation tax credit project under National Park Service supervision. The offending elements of gabled roofs, front and rear porches or canopies, and the windows which were replaced sometime in the past could all be proposed for removal under a tax credit project.

After a preliminary consultation with the review unit of SHPO that oversees the tax credit projects in advance of NPS review we found that this opinion was shared as to the viability of such a project. In addition such a project would return the complex to National Register eligibility and with a completed project it would earn the National Register listing.

A reversal of the determination of eligibility would allow the Syracuse Housing Authority Development Team an alternative of offering the complex to private developers who in turn could take advantage of the tax credit program to renovate the complex for mixed use development that would compliment the proposed Blueprint 15 planning goals.

The American Institute of Architects  
Central New York

Syracuse Coworks  
201 E. Jefferson St.  
Suite #200  
Syracuse, NY 13202  
T (315) 333 2421

[aiaony@aiaony.org](mailto:aiaony@aiaony.org)  
[www.aiaony.org](http://www.aiaony.org)





We agree with the findings of 'Adverse Effect' for the 'Viaduct Alternative' as stated in the DRAFT finding document on pg 24.

We support the 'Community Grid Alternative' not only because there would be no required demolitions of historic buildings but also because of the potential for the City of Syracuse to receive land back from the removal of I-81 Viaduct. The return of such land offers a long-term, economic based mechanism for the growth and revitalization of the city and the region.

Sincerely,

The American Institute of Architects  
Central New York

Syracuse Coworks  
201 E. Jefferson St.  
Suite #200  
Syracuse, NY 13202  
T (315) 333 2421

[aiaony@aiaony.org](mailto:aiaony@aiaony.org)  
[www.aiaony.org](http://www.aiaony.org)

Dean A. Biancavilla, AIA  
AIA CNY I-81 Task Force  
AIA Central New York

Anthony E. Rojas, AIA, president  
AIA Central New York

DB/db

cc: Mark Frechette, Project Engineer, NYSDOT



# DIVISION OF CITY PLANNING

CITY OF SYRACUSE, MAYOR BEN WALSH

September 12, 2019

**Owen Kerney**  
Assistant Director

Ms. Jessica Prockup  
Environmental Specialist II  
NYSDOT  
50 Wolf Street  
Albany, NY 12232

Dear Ms. Prockup:

Thank you for the opportunity to provide comments on the *Section 106 Finding Documentation* for the Interstate I-81 Viaduct Project. The following comments are based on the documents provided at the Section 106 Consulting Parties meeting held at the Senator Hughes State Office Building on August 12, 2019.

### ***Building Eligibility Assessment***

This office has carefully reviewed the *Updated Building Eligibility Assessment Table (November 2018)* as well as the other supplemental materials provided. The following properties located within the Area of Potential Effect (APE) have been determined “not eligible” for listing in the National Register by the State Historic Preservation Office (SHPO). We respectfully request that SHPO reconsider the eligibility of the following properties:

- 1) Pioneer Homes (S. Townsend St, E. Adams St, Monroe St, Raynor Ave, and E. Taylor St): In a letter dated December 7, 2016, SHPO determined that Pioneer Homes is not eligible for the National Register of Historic Places due to “loss of integrity”. It is this office’s opinion that Pioneer Homes retains sufficient integrity of site and design to be eligible for the National Register under Criteria A and C. The construction of the viaduct over Almond Street resulted in the removal of no more than 10% of the original building fabric of the housing development. In addition, alterations to the individual buildings are primarily additive in nature and do not substantially detract from the overall integrity of the development.
- 2) Presidential Plaza (E. Genesee, S. Townsend and Adams Sts): It is the opinion of this office that Presidential Plaza is eligible for the National Register under Criteria A and C. It is the only intact example of an Urban Renewal-era, superblock development in downtown Syracuse. In 1963, the City selected the team of Reynolds Aluminum Service Corporation of Washington D.C. and Eagen Real Estate of Syracuse to develop the 13.5-acre site that the city had cleared using federal “slum clearance” dollars. At its completion, Presidential Plaza included three high-rise apartments -- Jefferson Towers at 507-17 S. Townsend St (1967), Harrison House at 426-502 Madison St (1974), and Madison Hall at 601 S. Townsend St (1975); the Madison Townhouses also at 601 S. Townsend St (1975); and four office buildings, including the former Marine Midland Bank at 522 E.

**Division of City Planning**  
201 E. Washington St.  
City Hall Commons,  
Room 512  
Syracuse, N.Y. 13202

Office 315 448 8160

**[www.syr.gov.net](http://www.syr.gov.net)**

**GROWTH. DIVERSITY. OPPORTUNITY FOR ALL.**

Genesee St (1970), 550 E. Genesee St (1973), the Presidential Plaza Medical Office Building at 600 E. Genesee St (1964), and the former American General Life Insurance Building (now SUNY Upstate Medical building) at 513-17 Harrison Pl (1974). The majority of the buildings were designed by a single architecture firm: Keyes, Lethbridge and Condon of Washington D.C. (Note: Although a number of the individual buildings in Presidential Plaza are less than 50 years old, by the end of construction of the I-81 Viaduct Project, these buildings will have crossed the 50-year threshold.)

- 3) Other comments/revisions regarding eligibility determinations:
  - a. Franklin Square Historic District: As a result of the first phase of a comprehensive, reconnaissance-level survey of the city's historic resources (initiated in 2019), the boundaries for a new historic district within the Franklin Square area have been identified. The district boundaries are attached.
  - b. 215 Burnet Ave: This property was recently determined eligible for the National Register as a result of the above-noted historic resources survey. The survey form is attached.
  - c. North Salina Street Historic District Boundary Increase. In regard to the footnote on page 35 of the eligibility assessment table, the district expansion was listed in the National Register on 4/5/2019.
  - d. Everson Museum: The Everson Museum turned 50 years old in 2018. (The table indicates that it is less than 50 years old.)

#### ***Direct and Indirect Effects Assessment***

In regard to *Appendix D: Proposed Changes to Historic Properties in the APE*, this office has the following comments.

- 1) Indirect effects assessment: The consultant has provided a detailed assessment of the direct, physical effects that the Viaduct and Community Grid alternatives will have on historic resources. However, the consultant has provided little analysis of indirect effects. For example, the removal of the viaduct as part of the grid alternative will have a major (potentially positive) effect on the visual character surrounding Smith Restaurant Supply Building (500 E Water St), Reed and Peck Halls (601 E. Genesee St) and other resources located in the immediate vicinity. A similar analysis would be helpful surrounding the new interchange at Crouse and Irving Avenues, which will be in close proximity to the former NY Central Railroad Passenger Station. We request that NYSDOT include a thorough analysis of the indirect effects to historic resources as part of the Section 106 documentation.
- 2) Oakwood Cemetery: The consultants find that there will be "no adverse effect" to Oakwood Cemetery as a result of either the Viaduct or the Community Grid options. It is worth noting that the original construction of the highway had and continues to have a profound negative impact on this nationally significant, historic landscape. The construction of the highway embankment eliminated the main, west entrance to the cemetery off Oakwood Ave and forced the abandonment of the stone entrance gate, the original administration building and the main chapel. The western section of the cemetery has since been subject to ongoing vandalism and deterioration due to its isolation and lack of visibility. In addition, the visual impacts of the

highway on the cemetery as well as noise and pollution have been significant. As the I-81 Viaduct Project progresses, we request that NYSDOT take into consideration mitigation measures to reduce the existing and ongoing adverse impacts of the roadway on this National Register-listed resource.

Thank you for your consideration of these comments. We appreciate the effort that NYSDOT has taken throughout this process to identify historic resources and to seek measures and design alternatives that avoid potential impacts to those resources.

If this office can be of any further assistance, please do not hesitate to contact me at 315-448-8108 or [kauwaarter@syrgov.net](mailto:kauwaarter@syrgov.net).

Sincerely,



Kate Auwaeter  
Preservation Planner

Attachments



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

WAHID ALBERT, P.E.  
Chief Engineer

October 25, 2019

Jared Gross  
Federal Highway Administration, NY Division  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

RE: **Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Mr. Gross:

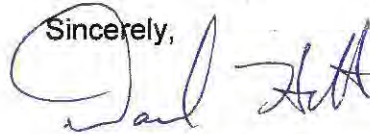
The New York State Department of Transportation (NYSDOT) is writing in response to comments and questions submitted to the Federal Highway Administration (FHWA) by the Onondaga Nation, based on review of the *Phase IB Archaeological Survey: Shovel Testing* report (Phase IB report) for the I-81 Viaduct Project. As part of continuing Section 106 consultation between the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the NYSDOT and FHWA in accordance with 36 CFR Part 800, we would like to provide clarification regarding questions and concerns raised by Ms. Tiffany Lee on September 2, 2019, and adopted as the Nation's formal submission on the Phase IB report.

The NYSDOT forwarded the Onondaga Nation's comments to the archaeological consultant, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR), requesting additional information regarding certain decisions that were made in the field and clarification of the stratigraphic profiles encountered during Phase IB shovel testing at three specific locations. Enclosed please find a letter from EDR dated September 12, 2019, providing responses to each question raised by the Onondaga Nation. In addition, EDR has revised Appendix IV of the Phase IB report, to include additional notes and clarification of shovel test pit data referenced in Ms. Lee's comments.

The NYSDOT has reviewed and supports EDR's response, including the revised record of shovel testing (Appendix IV). We respectfully request that the FHWA forward a copy of this letter along with the enclosed correspondence from EDR dated September 12, 2019 and the attached Appendix IV: Shovel Test Stratigraphic Profiles (revised September 2019) to the Onondaga Nation and the Tuscarora Nation. The revised Appendix IV replaces the existing Appendix IV in the Phase IB report.

If you have any questions, or if the Onondaga Nation has any additional concerns regarding the Phase IB shovel testing, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. The NYSDOT would like to express our appreciation of the Onondaga Nation's thoughtful review of the Phase IB report and continuing interest in this project.



Sincerely,  


Daniel P. Hitt, RLA  
Director, Office of Environment

DH/jp

Encl: Letter from Nick Freelend, EDR to NYSDOT, September 12, 2019  
I-81 *Phase IB Archaeological Survey: Shovel Testing*, Appendix IV: Shovel Test  
Stratigraphic Profiles (revised September 2019)

cc: M. Frechette, NYSDOT (w/encl.)  
R. Davies, FHWA (w/encl.)  
M. Ranslow, ACHP (w/encl.)  
J. Bonafide, NYS OPRHP/SHPO (w/ encl.)  
N. Herter, NYS OPRHP/SHPO (w/encl.)



**Environmental Design & Research,**  
Landscape Architecture, Engineering & Environmental Services, D.P.C.  
217 Montgomery Street, Suite 1000, Syracuse, New York 13202  
P. 315.471.0688 • F. 315.471.1061 • [www.edrdpc.com](http://www.edrdpc.com)

September 12, 2019

Ms. Jessica Prockup  
Environmental Specialist 3  
Environmental Impact Statements & Special Projects Bureau  
New York State Department of Transportation  
Office of Environment  
Sent via email to: [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov)

RE: **Response to the Onondaga Nation's Comments on the** *Phase IB Archaeological Survey: Shovel Testing, I-81 Viaduct* report.

Dear Ms. Prockup:

Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR) conducted a Phase IB archaeological shovel testing survey for the I-81 Viaduct Project during November 2017 and November 2018. The Phase IB shovel testing was based on a sensitivity model presented in the *Phase IA Archaeological Sensitivity Assessment* (EDR, 2016) and in accordance with the methodology presented in the *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery* (EDR, 2017). The Phase IB work plan was developed in consultation with the Onondaga Nation and SHPO/NYSOPRHP. SHPO/NYSOPRHP reviewed and approved the Phase IA report and Phase IB work plan on September 22, 2016 and July 19, 2017, respectively (Bonafide, 2016; Herter, 2017). The results of the Phase IB shovel testing survey were presented in the *Phase IB Archaeological Shovel Testing* report (EDR, 2019) which was reviewed and approved by SHPO/NYSOPRHP on July 25, 2019 (Herter, 2019).

This memorandum provides responses to the comments provided on September 2, 2019 by Tiffany Lee of the Onondaga Nation to Patricia Millington of the Federal Highway Works Administration regarding the 2019 *Phase IB Archaeological Survey: Shovel Testing, I-81 Viaduct* report (the Phase IB Report). The comments were forwarded to EDR by Jessica Prockup of the New York State Department of Transportation (NYSDOT) via email on September 5, 2019.

The comments from the Onondaga Nation on the Phase IB report are reproduced in their entirety below, followed by responses to each individual comment. The comments state:

"I have had a chance to further review the documents you had mailed to me and I wanted to inquire about a few items that need further clarification. First, in the I-81/I-481 North Interchange survey zone, STP N4.01 and N4.02 were labelled undisturbed. N4.01 had two stratigraphic layers recorded (I. 0-29 10YR 2/2; II. 29-49 10YR

5/4), while N4.02 had similar data recorded for the first stratigraphic layer (I. 0-25 10YR 2/2) but a second stratigraphic layer was not recorded. Due to the depth of N4.02 being so shallow, I would like to know why shovel testing was halted at ~25 cmbs.

Secondly, in the I-481 East Improvements survey zone, shovel test pits E3.15 and E3.16 did not have a maximum depth recorded. I would like to know what the maximum depth of excavation for these two shovel tests were and why this data was not recorded. I would also like clarification for the maximum excavated depth recorded for shovel test pit E5.17 (17cm), when surrounding shovel test pits are more than 30 cm deeper (E5.16: 48cm; E5.18: 53 cm). Why was this shovel test not excavated to a depth that is comparable to the others in the area?

Thirdly, in the I-81/I-481 South Interchange survey zone, the shovel test pit S5.05 exhibited coarse sand with small chert cobbles and was labelled as naturally occurring sediment. However, this is the only shovel test pit with this type of sediment present and would like clarification on why it was determined to be natural without further investigation.

Finally, I would like clarification on why shovel testing was not done at shorter intervals in areas that may have warranted further investigation.”

**Response to the Onondaga Nation’s comments** are presented below:

Comment 1. First, in the I-81/I-481 North Interchange survey zone, STP N4.01 and N4.02 were labelled undisturbed. N4.01 had two stratigraphic layers recorded (I. 0-29 10YR 2/2; II. 29-49 10YR 5/4), while N4.02 had similar data recorded for the first stratigraphic layer (I. 0-25 10YR 2/2) but a second stratigraphic layer was not recorded. Due to the depth of N4.02 being so shallow, I would like to know why shovel testing was halted at ~25 cmbs.

Response 1. **As noted in the “comments/artifacts” column of the shovel test stratigraphic profiles table** (Appendix IV in the Phase IB report), shovel test N4.02 encountered a rock impasse at 25 cm below surface (cmbs) which physically prohibited further excavation beyond this point. **In EDR’s field notes, a rock impasse indicates bedrock or an otherwise sizable rock or boulder that prevents further excavation.**

Comment 2. Secondly, in the I-481 East Improvements survey zone, shovel test pits E3.15 and E3.16 did not have a maximum depth recorded. I would like to know what the maximum depth of excavation for these two shovel tests were and why this data was not recorded. I would also like clarification for the maximum excavated depth recorded for shovel test pit E5.17 (17cm), when surrounding shovel test pits are more than 30 cm deeper (E5.16: 48cm; E5.18: 53 cm). Why was this shovel test not excavated to a depth that is comparable to the others in the area?

Response 2. EDR reviewed the field notes for shovel tests E3.15 and E3.16, which indicate that excavators encountered standing water at the maximum depths indicated in Appendix IV (43 cmbs and 28 cmbs, respectively). In both shovel tests, the excavator reached the top of the subsoil and was able to document the color and texture before the shovel test began to fill with water but was not able to

excavate deeper due to the inundation. The stratigraphic records for these two shovel tests have been revised in the attached version of Appendix IV from the Phase IB report (revisions highlighted).

The field notes for shovel test E5.17 indicate that excavators encountered a root impasse (a large tree root) at 17 cmbs. This note has been added to the stratigraphic records for shovel test E5.17 in the attached revised version of Appendix IV from the Phase IB report (revisions highlighted).

Comment 3. Thirdly, in the I-81/I-481 South Interchange survey zone, the shovel test pit S5.05 exhibited coarse sand with small chert cobbles and was labelled as naturally occurring sediment. However, this is the only shovel test pit with this type of sediment present and would like clarification on why it was determined to be natural without further investigation.

Response 3. Although shovel test S5.05 was surrounded by shovel tests containing slightly different stratigraphy, coarse sand or sand (often a component of a coarse sandy loam or clay in surrounding tests) was present throughout the area, as were variable concentrations of pebbles and gravels (see shovel tests S5.02 through S5.07). Therefore, EDR did not feel that the soils encountered in shovel test S5.05 differed sufficiently from the surrounding shovel tests to warrant additional investigation. As described in the Phase IB Report (page 31) the chert cobbles and gravels encountered in shovel test S5.05 were examined closely and were not cultural modified. Chert outcrops in Onondaga limestone are present throughout the surrounding area and our staff routinely note the presence of naturally occurring chert when observed.

Comment 4. Finally, I would like clarification on why shovel testing was not done at shorter intervals in areas that may have warranted further **investigation.”**

Response 4. As described in the Phase IB Report (page 32), nine shovel tests (XA.01 through XA.09) were excavated at 7.5 meter intervals in the vicinity of the Onondaga Arsenal Site (Unique Site Number A06740.000389) and New York State Museum (NYSM) Area 4192 in the I-81/I-481 Southern Interchange, because this area was sensitive to contain historic-period and pre-contact Native American archaeological materials. As described in the Phase IB Report (EDR, 2019:27):

“Research conducted for the Phase IA Report (EDR, 2016) identified two previously reported archaeological sites in the vicinity of the I-81/I-481 Southern Interchange: USN A06740.000389 (“Old Arsenal Site,” **site of an arsenal used during the War of 1812, known as the Onondaga Arsenal**) and NYSM Area 4192, **described as ‘many early articles...near the old arsenal on the east side of the valley, lot 121, Onondaga’ by Parker (1922:641).** Regarding the potential for historic-period archaeological materials related to the Onondaga Arsenal, **EDR (2016:218) noted: ‘it is anticipated that there is a high potential for intact archaeological resources to be located at the Onondaga Arsenal Site. It is unknown whether these resources extend within the APE for Direct Effects.’**

Regarding the NYSM sites located within or adjacent to the APE for Direct Effects, EDR (2016:33) noted in the Phase IA Report that:

The NYSM Sites consist of broad areas defined by Parker (1922) often on the basis of second-hand reports. Whereas NYSOPRHP Sites could be considered to represent specific resources (which may or may not be extant), NYSM Sites represent broadly defined areas of elevated prehistoric archaeological sensitivity which may or may not contain extant resources within their boundaries. NYSM Sites are not considered to be equivalent to formally defined archaeological site boundaries and, therefore, they are treated here only as areas of elevated prehistoric archaeological sensitivity.”

ER’s Phase IB shovel testing was conducted in accordance with the Phase IB Work Plan (EDR, 2017), which included reference to the **New York Archaeological Council’s (NYAC’s)** 1994 *Standards for Cultural Resource Investigations and the Curation of Archaeological Collections in New York State* (“the NYAC Standards”; NYAC, 1994) and relevant portions of **the NYSOPRHP’s 2005 Phase I Archaeological Report Format Requirements** (“the NYSOPRHP Guidelines”; NYSOPRHP, 2005). Regarding Phase IB survey, the NYAC Standards (NYAC, 1994:3) state: “where surface visibility is impaired (e.g. grass lawns, wooded areas), the field survey consists of the excavation of 30 to 50-centimeter minimum diameter test units to undisturbed or non-artifact bearing subsoil at a maximum of 15-meter intervals.” Regarding the need for additional testing at smaller intervals, the NYAC Standards (NYAC, 1994:3) state: “when cultural materials are discovered in isolated shovel-test units, a minimum of four additional units should be dug in the vicinity or the initial test units should be expanded to insure against mistaking evidence of actual sites for “stray finds.” and the 2005 NYSOPRHP Guidelines (NYSOPRHP, 2005:3) state: “when artifacts are discovered in an isolated shovel test context, a minimum of eight (8) additional shovel tests at 1 m (3.3 ft) and 3 m (10 ft) intervals must be excavated” and “if the project area includes a standing historic structure or an MDS within its boundaries, the shovel testing interval must be 7.5 m (25 ft) or less in the suspected yard area.”

Based on the guidelines cited above, additional shovel tests at shorter intervals were not determined to be warranted in areas other than the vicinity of the Onondaga Arsenal, as discussed above. Shorter-interval shovel tests were not excavated at the Britton Limeworks Site because the site boundary was based primarily on features visible on the ground surface and the shovel tests excavated at 15-meter intervals throughout the site encountered disturbed soils. In accordance with the 2005 NYSOPRHP Guidelines, had pre-contact Native American materials or other historic-period materials been encountered in other shovel tests during the survey, then additional shovel tests would have been excavated at shorter intervals around the positive shovel tests.

We hope that the responses and additional information provided herein facilitate your review of the Phase IB report. If you have any questions/concerns, please contact Patrick Heaton ([pheaton@edrdpc.com](mailto:pheaton@edrdpc.com)) at 315-471-0688 or Nick Freeland ([nfreeland@edrdpc.com](mailto:nfreeland@edrdpc.com)) at 307-349-0417.

Sincerely,





Nick Freeland, RPA  
Senior Cultural Resources Specialist  
Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C.

Attachments:

Revised Appendix IV: Shovel Test Stratigraphic Profiles

References Cited:

Bonafide, John A. 2016. Re: FHWA/NYS DOT Interstate 81-Viaduct Project/PIN 3501.60, Towns of Salina, Cicero and Dewitt/City of Syracuse, Onondaga County: 16PR006314 (13PR05089 and 13PR05437). Review correspondence from John Bonafide (NYSOPRHP) to Daniel Hitt (NYSDOT). New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. September 22, 2016.

Environmental Design and Research Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR). 2016. *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 EDR, Syracuse, NY.

EDR. 2017. *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction Including Data Recovery: I-81 Viaduct Project, City of Syracuse and Towns of Salina, Cicero, and Dewitt, Onondaga County, New York*. 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., Syracuse, NY.

EDR. 2019. *Phase IB Archaeological Survey: Shovel Testing, I-81 Viaduct Project, City of Syracuse and Towns of Salina, Cicero, and Dewitt, Onondaga County, New York*. 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., Syracuse, NY.

Herter, Nancy. 2017. Re: FHWA Interstate 81 (i-81) Viaduct Project, PIN 3501.60: I-81 Viaduct Project, City of Syracuse, Towns of Salina, Cicero, and Dewitt, Onondaga County, 16PR06314. Review correspondence from Nancy Herter (NYSOPRHP) to Daniel Hitt (NYSDOT). New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. July 19, 2017.

Herter, Nancy. 2019. RE: PIN 3501.60 I-81 Viaduct Project: Letter Transmitting Phase IB Archaeological Report to SHPO. Review correspondence from Nancy Herter (NYSOPRHP) to Jessica Prockup (NYSDOT). New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. July 25, 2019.

New York Archaeological Council (NYAC). 1994. *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State*. New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY.

New York State Office of Parks, Recreation, and Historic Preservation (NYSOPRHP). 2005. *New York State Historic Preservation Office (SHPO) Phase I Archaeological Report Format Requirements*. On file, New York State Office of Parks, Recreation, and Historic Preservation, Waterford, NY. Available at <https://cris.parks.ny.gov/>.

Parker, Arthur C. 1922. *The Archaeology of the State of New York*. Bulletins No. 237 and 238, The University of the State of New York, New York State Museum, Albany.

**LAW OFFICE OF JOSEPH J. HEATH**  
GENERAL COUNSEL FOR THE ONONDAGA NATION  
512 JAMESVILLE AVENUE  
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315-447-4851  
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November 8, 2019

Daniel Hitt  
Office of Environment  
NYS Department of Transportation  
50 Wolf Road  
Albany, NY 12232

**Re: Sensitivity Designations, Site Monitoring, and Worker Training  
I-81 Viaduct Project**

Dear Mr. Hitt:

Recently, Tony Gonyea, Onondaga Nation Faithkeeper, Tiffany Lee, and I met with representatives of the Federal Highway Administration (FHWA) and the State Historic Preservation Office (SHPO) to get a better sense of the next stages in the I-81 Viaduct project. During that meeting, we identified three specific issues that may be important in the development of a Programmatic Agreement for this project and for planning related to the on-going archaeological assessment during project construction. Specifically, we wanted to raise concerns related to archaeological sensitivity determinations of areas that will be disturbed during construction, monitoring of active construction areas, and training for construction workers and on-site supervisors.

While the Onondaga Nation recognizes that complete and intact archaeological sites are unlikely to be found in previously disturbed soils, cultural artifacts and even human remains may still be present in these areas. As noted in the Phase IA report, during the early stages of development in Syracuse, it was common practice to cut back hillsides and ridges and use that material as fill in valleys and marshes. Some areas of present-day Salina Street received as much as five feet of fill, while steep slopes rising along present-day Onondaga Street were cut back by 6 to 8 feet to allow for easier construction. (Phase IA Report, p. 147). The transported soils may well have contained cultural artifacts. If these soils were not carefully screened at the time, these cultural artifacts may now have come to rest in areas that would be considered "previously disturbed." Again, while this practice would not yield intact archaeological sites, individual artifacts or even human remains may have survived the transfer.

In addition, our experience teaches us that even areas with extensive construction and prior development may house cultural artifacts. The Nation continues to be contacted about human remains discovered in areas that were considered “previously disturbed” and therefore did not warrant pre-construction archaeological assessment. Just in the last year, human remains identified as Native American have been found during utility installation in an area with existing development (parking lots, a building, and additional utility lines) and along a heavily trafficked roadway. In both cases, the areas had been previously studied or were considered too heavily disturbed to warrant additional archaeological assessment.

Given this history, the Nation urges careful assessment even in areas recognized as “previously disturbed” and therefore not considered “sensitive” or likely to contain cultural artifacts or human remains. This does not necessarily mean conducting pre-construction investigations throughout the project footprint. However, the areas that are excluded from archaeological investigation should be limited. In addition, if NYS DOT is going to rely on visual monitoring of construction sites to protect cultural artifacts and/or human remains, that monitoring must be highly focused and carefully tailored to ensure adequate protection.

The Nation’s strong preference is to have a cultural monitor, chosen or approved by the Nation, at all active construction sites. Certainly, this is necessary in any areas already identified as culturally sensitive. However, it is also warranted in “non-sensitive” or previously disturbed areas. As discussed above, there are reasons to believe that cultural resources or human remains may have been transported to these areas or may lie undiscovered just outside the parameters of previous disturbance. This is particularly true, since there do not appear to have been monitors on-site for previous work. Cultural artifacts or skeletal remains that are not obviously human may well have been overlooked or ignored during this earlier work. Given the value provided by this monitor, this cost should be incorporated into the project budget.

At minimum, NYS DOT should ensure that monitors chosen by the Onondaga Nation are present during active construction in areas already identified as culturally sensitive. These areas include, but are not limited, the Park Street/Old Liverpool/Onondaga Lake Parkway; the Onondaga Trough; the current and former channels of Onondaga Creek, Limestone Creek, and Butternut Creek; and the Cicero Swamp area. Monitors provided by the Onondaga Nation will be more likely to identify potentially overlooked artifacts both because they will be focused on this task, rather than splitting attention between construction and monitoring, and because they have extensive experience with and special expertise in identifying cultural artifacts. It is far too easy for untrained construction workers to miss or ignore cultural materials that deserve protection or incomplete skeletal remains. Again, given the value of Nation-designated monitors to the I-81 Viaduct project, we expect that they will be compensated from project funds for the time spent on site.

If it is not possible to have a Nation-designated or approved monitor at every one of the multiple construction sites that may be active on any given day within this large project, field staff should be equipped to recognize cultural artifacts and incomplete skeletal remains. And to properly respond. At minimum, all field staff can and should receive basic training in how to

**Re: Sensitivity Designations, Monitoring, and Training for I-81 Viaduct Project**

November 8, 2019

Page 3

recognize cultural artifacts or incomplete human remains that may be encountered during construction. The training should emphasize the need to stop work immediately upon such discovery to allow assessment of the find and to prepare a response plan. Field supervisors should receive additional training in how to respond to the unexpected discovery of This training should be done by or include Nation representatives, who can provide clear and detailed information on the materials that might be discovered and insight into the importance of respectful treatment of these artifacts. As with the monitoring services, trainers provided by the Nation are providing a benefit to the project and should be compensated using project funds.

Thank you for your attention to these comments. We look forward to discussing these proposals in more detail in the near future.

Sincerely,

*Alma L. Lowry*

Alma L. Lowry, Of Counsel

cc: Onondaga Council of Chiefs  
Anthony Gonyea, Onondaga Nation Faith Keeper  
Joe Heath, General Counsel/Onondaga Nation  
Jared Gross, Federal Highway Administration, New York Division  
Nancy Herter, New York State Historic Preservation Office





**Department of  
Transportation**

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

November 26, 2019

Ms. Alma L. Lowry, Esq.  
Law Office of Joseph J. Heath  
General Counsel for the Onondaga Nation  
512 Jamesville Avenue  
Syracuse, New York 13210-1502

RE: ***Sensitivity Designations, Site Monitoring, and Worker Training***  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Ms. Lowry:

Thank you for your letter dated November 8, 2019 regarding issues identified in relation to the development of a Section 106 agreement document for the I-81 Viaduct Project and ongoing archaeological assessment during the Project's construction. Specifically, your letter articulated the concerns of the Onondaga Nation with respect to the archaeological sensitivity of areas that will be disturbed during construction of the Project, proposed monitoring of active construction areas, and proposed training for construction workers and on-site supervisors.

The New York State Department of Transportation (NYSDOT) will consider and discuss your proposal with the New York State Historic Preservation Office (SHPO) and the Federal Highway Administration (FHWA) in the very near future. Following these discussions, we will reach out in response to your concerns.

Sincerely,

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/bb

Encl: Letter from Alma L. Lowry (November 8, 2019)

cc: Onondaga Council of Chiefs (w/out encl.)  
Anthony Gonyea, Onondaga Faith Keeper (w/out encl.)  
Joe Heath, General Counsel / Onondaga Nation (w/out encl.)

Robert M. Davies, FHWA (w/ encl.)  
Jared Gross, FHWA (w/out encl.)  
John Bonafide, NYSOPRHP (w/ encl.)  
Nancy Herter, NYSOPRHP (w/out encl.)  
Wahid Albert, P.E., NYSDOT 6<sup>th</sup> floor (w/ encl.)  
George Doucette, NYSDOT Region 3 (w/ encl.)  
Mark Frechette, NYSDOT Region 3 (w/ encl.)

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## Department of Transportation

**ANDREW M. CUOMO**  
Governor

**MARIE THERESE DOMINGUEZ**  
Commissioner

**WAHID ALBERT, P.E.**  
Chief Engineer

December 3, 2019

John Bonafide  
Director, Bureau of Technical Preservation Services  
Division for Historic Preservation  
NYS Office of Parks, Recreation & Historic Preservation  
Peebles Island State Park - P.O. Box 189  
Waterford, New York 12188-0189

RE: **Section 106 Consultation**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Bonafide:

On August 12, 2019, as part of Section 106 consultation for the I-81 Viaduct Project, the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), held a meeting to engage Consulting Parties in the assessment of effects on identified historic properties. At this meeting, the NYSDOT provided a copy of the draft Finding Documentation for the Consulting Parties' review and comment. The documentation, prepared in accordance with the standards specified in 36 CFR §800.11(e), included a description of steps taken to identify historic properties.

In response, several of the Consulting Parties provided written comments on the assessment of the Pioneer Homes (USN 06740.014017), noting the opinion that the Pioneer Homes warrants reconsideration as a historic property eligible for the National Register of Historic Places. As described in a letter from the City of Syracuse, Division of City Planning, "...Pioneer Homes retains sufficient integrity of site and design to be eligible for the National Register under Criteria A and C" (K. Auwaerter, September 12, 2019).

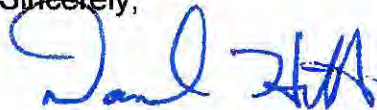
In response to a request from the NYSDOT on November 21, 2016, the State Historic Preservation Office (SHPO) had previously considered the potential eligibility of the Pioneer Homes as a historic district representing a planned community within the context of the "public housing project" property type, meeting National Register Criterion A under Community Planning and Development. The NYSDOT also recommended Pioneer Homes as eligible under Criterion C for its distinctive features of design. On December 7, 2016, the SHPO provided the opinion that the Pioneer Homes housing complex is not National Register-eligible, citing a significant loss of integrity.



To ensure that the views of Section 106 Consulting Parties are given due consideration, the NYSDOT, in coordination with the FHWA, respectfully requests comments from the SHPO regarding the merit of reconsidering the eligibility of the Pioneer Homes for the National Register, as suggested in the enclosed Consulting Party correspondence.

If you have any questions, please feel free to contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or (518) 417-6642.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel P. Hitt", with a stylized flourish at the end.

Daniel P. Hitt, RLA  
Director, Office of Environment

DH/ms/bb

Encl: Letter from Cynthia Carrington Carter, Preservation Association of Central New York, September 11, 2019

Letter from Kate Auwaerter, City of Syracuse, September 12, 2019

Letter from Dean Biancavilla, The American Institute of Architects Central New York, September 12, 2019

cc: R. Davies, FHWA NY Division (w/ encl.)  
H. Anker, FHYWA NY Division (w/ encl.)  
M. Lynch, OPRHP / SHPO (w/ encl.)  
K. Howe, OPRHP / SHPO (w/ encl.)  
M. Ranslow, ACHP (w/ encl.)  
M. Frechette, NYSDOT (w/ encl.)



## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ERIK KULLESEID  
Commissioner

February 24, 2020

Mary Santangelo  
Environmental Specialist II  
NYSDOT  
50 Wolf Rd  
Albany, NY 12054

Re: FHWA  
Interstate 81 (I-81) Viaduct Project/PIN 3501.60  
I-81 at 690, City of Syracuse, Onondaga County, NY  
16PR06314  
PIN 3501.60

Dear Mary Santangelo:

The Office of Environment submitted correspondence dated December 3, 2019, requesting SHPO comments regarding a reassessment of NR eligibility for Pioneer Homes. The NYSDOT letter and associated materials uploaded to CRIS have been evaluated by this office.

Despite being one of the first public housing projects in New York State, Pioneer it is not National Register eligible because of loss of integrity. According to the Multiple Property Document called "Public Housing in the United States," prepared by the National Park Service, Pioneer would not meet the Registration Requirements for eligibility.

- First, two ranges of the complex were destroyed for the construction of I-81, resulting in the loss of significant elements of the symmetrical site plan of the project. This has resulted in not only the loss of some of the components of the project, but also drastic change in Pioneer's setting.
- Second, there has been alteration of key character-defining architectural features of the property, including installation of entirely different roof structures, inappropriate window replacement and alteration of building entries.

These alterations have been deemed disqualifying for listing in the NPS document in other similar properties in other parts of the United States and are important enough to cause the property to be not eligible for the National Register.

Sincerely,

James Finelli, Historic Preservation Program Analyst





## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

September 25, 2020

John A. Bonafide  
Director, Technical Preservation Services Bureau  
Division for Historic Preservation  
Agency Historic Preservation Officer  
NYS Office of Parks, Recreation & Historic Preservation  
Peebles Island State Park - P.O. Box 189  
Waterford, New York 12188-0189

RE: **Section 106 Consultation: Phase IB Archaeological Survey: Shovel Testing**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting the report entitled *Phase IB Archaeological Survey: Shovel Testing*, prepared for the I-81 Viaduct project (the Project) for review by New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

The NYSDOT previously provided the draft *Phase IB Archaeological Survey: Shovel Testing* to the SHPO on July 23, 2019. The SHPO responded in an e-mail dated July 25, 2020 stating that it had no concerns or comments regarding the report.

In October 2019 and July 2020, the Project's Area of Potential Effects for direct effects was amended as a result of changes to the project design. Additional shovel testing was conducted in two small areas using the established methodology presented in the approved *Phase IB Archaeological Survey Work Plan*. The results are presented in the updated *Phase IB Archaeological Survey: Shovel Testing* report (enclosed), completing the initial stage of the Phase IB archaeological survey for the Project. The *Phase IB Archaeological Survey: Shovel Testing* report is being transmitted to the Onondaga Nation and the Tuscarora Nation. As outlined in the *Phase IB Archaeological Survey Work Plan*, the remaining archaeological investigations, using mechanical excavation and archaeological monitoring during construction, will be carried out as the project progresses.

The NYSDOT respectfully requests written comments from the SHPO on the *Phase IB Archaeological Survey: Shovel Testing* by October 9, 2020. If you have any questions concerning review of this report, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

*Angelo Trichilo*

9/25/2020

Angelo Trichilo, PE  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

Encl: *Phase IB Archaeological Survey: Shovel Testing (September 2020)*

cc: R. Davies, FHWA (w/out encl.)  
J. Gross, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

September 25, 2020

Mr. Bryan Printup  
Tuscarora Environment Office  
5226 E. Walmore Road  
Tuscarora Nation  
Via Lewiston, NY 14092

RE: ***Section 106 Consultation: Phase IB Archaeological Survey: Shovel Testing***  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Printup:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting the report entitled *Phase IB Archaeological Survey: Shovel Testing*, prepared for the I-81 Viaduct project (the Project) for review by the Tuscarora Nation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

The NYSDOT previously provided the draft *Phase IB Archaeological Survey: Shovel Testing* to the Tuscarora Nation on August 2, 2019. In October 2019 and July 2020, the Project's Area of Potential Effects for direct effects was amended as a result of changes to the project design. Additional shovel testing was conducted in two small areas using the established methodology presented in the approved *Phase IB Archaeological Survey Work Plan*. The results are presented in the updated *Phase IB Archaeological Survey: Shovel Testing* report (enclosed), completing the initial stage of the Phase IB archaeological survey for the Project. As outlined in the *Phase IB Archaeological Survey Work Plan*, the remaining archaeological investigations, using mechanical excavation and archaeological monitoring during construction, will be carried out as the project progresses.

The *Phase IB Archaeological Survey: Shovel Testing* has been transmitted to the New York State Historic Preservation Office (SHPO), and we will share any comments that the SHPO provides based on review of the report. The NYSDOT respectfully requests written comments from the Tuscarora Nation on the *Phase IB Archaeological Survey: Shovel Testing* by October 27, 2020.

If you have any questions concerning review of this report, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA, we appreciate your interest in this project, and look forward to continuing consultation with the Tuscarora Nation.

Sincerely,

*Angelo Trichilo*

9/25/2020

Angelo Trichilo, PE  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

Encl: *Phase IB Archaeological Survey: Shovel Testing (September 2020)*

cc: R. Davies, FHWA (w/out encl.)  
J. Gross, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)



September 25, 2020

Faithkeeper Anthony Gonyea  
DYODIHWASNYE'NHA  
Administration Building  
4040 Route 11  
Onondaga Nation  
via-Nedrow, NY 13120

RE: **Section 106 Consultation: Phase IB Archaeological Survey: Shovel Testing**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Faithkeeper Gonyea:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting the report entitled *Phase IB Archaeological Survey: Shovel Testing*, prepared for the I-81 Viaduct project (the Project) for review by the Onondaga Nation in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

The NYSDOT previously provided the draft *Phase IB Archaeological Survey: Shovel Testing* to the Onondaga Nation on August 2, 2019. The Onondaga Nation provided written comments to the FHWA and NYSDOT in an e-mail from Alma Lowry dated September 4, 2019, requesting clarification about the testing and results at a few discrete shovel test pits. In response to the Onondaga's request, the shovel test pit record (Appendix IV of the report) was revised.

In October 2019 and July 2020, the Project's Area of Potential Effects for direct effects was amended as a result of changes to the project design. Additional shovel testing was conducted in two small areas using the established methodology presented in the approved *Phase IB Archaeological Survey Work Plan*. The results are presented in the updated *Phase IB Archaeological Survey: Shovel Testing* report (enclosed), completing the initial stage of the Phase IB archaeological survey for the Project. As outlined in the *Phase IB Archaeological Survey Work Plan*, the remaining archaeological investigations, using mechanical excavation and archaeological monitoring during construction, will be carried out as the project progresses.

The *Phase IB Archaeological Survey: Shovel Testing* has been transmitted to the New York State Historic Preservation Office (SHPO), and we will share any comments the SHPO provides based on review of the report. The NYSDOT respectfully requests written comments from the Onondaga Nation on the *Phase IB Archaeological Survey: Shovel Testing* by October 27, 2020.

If you have any questions concerning review of this report, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. On behalf of the FHWA, we appreciate your interest in this project, and look forward to continuing consultation with the Onondaga Nation.



Sincerely,

*Angelo Trichilo*

9/25/2020

Angelo Trichilo, PE  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

Encl: *Phase IB Archaeological Survey: Shovel Testing (September 2020)*

cc: Onondaga Council of Chiefs (w/out encl.)  
A. Lowry, Onondaga Nation (w/ encl.)  
R. Davies, FHWA (w/out encl.)  
J. Gross, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

October 1, 2020

John A. Bonafide  
Director, Technical Preservation Services Bureau  
Division for Historic Preservation  
Agency Historic Preservation Officer  
NYS Office of Parks, Recreation & Historic Preservation  
Peebles Island State Park - P.O. Box 189  
Waterford, New York 12188-0189

RE: **Section 106 Consultation: Architectural Resources Survey Addendum**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting the report entitled *Architectural Resources Survey Addendum: I-81 Viaduct Project*, prepared for the I-81 Viaduct project (the Project), for review by the New York State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800).

The NYSDOT previously provided the *Architectural Resources Survey: I-81 Viaduct Project* to the SHPO in September 2016 with additional consultation occurring on November 21, 2016, December 7, 2016, and December 21, 2016. Since 2016, the evaluation of architectural properties has been updated to incorporate proposed project modifications and refinements, updated information from the SHPO's Cultural Resource Information System (CRIS), and changes in existing conditions. These changes are summarized in the enclosed *Architectural Resources Survey Addendum*.

The final list of National Register-listed and eligible properties identified in the Project's area of potential effects (APE) is documented in the Updated Building Eligibility Assessment Table found in Appendix A of the enclosed *Architectural Resources Survey Addendum*. The NYSDOT respectfully requests written concurrence from the SHPO with the eligibility recommendations for the additional properties identified in the Architectural Resources Survey Addendum by October 15, 2020.

If you have any questions concerning review of this report, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

*Angelo Trichilo*

10/1/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

Encl: *Architectural Resources Survey Addendum: I-81 Viaduct Project (September 2020)*

cc: R. Davies, FHWA (w/out encl.)  
J. Gross, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
M. Frechette, NYSDOT (w/out encl.)



## Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO  
Governor

ERIK KULLESEID  
Commissioner

October 14, 2020

Ms. Mary Santangelo  
Environmental Specialist II  
NYSDOT  
50 Wolf Rd  
Albany, NY 12054

Re: FHWA  
Interstate 81 (I-81) Viaduct Project/PIN 3501.60  
I-81 at 690, City of Syracuse, Onondaga County, NY  
16PR06314  
PIN 3501.60

Dear Ms. Santangelo:

Our office has reviewed the final list of National Register-listed and eligible properties identified in the Project's area of potential effects (APE) as documented in the Updated Building Eligibility Assessment Table found in Appendix A of the *Architectural Resources Survey Addendum* submitted on October 1, 2020. The SHPO concurs with the eligibility recommendations for the additional properties identified in the *Architectural Resources Survey Addendum*.

Sincerely,

A handwritten signature in black ink that reads "James Finelli".

James Finelli  
Historic Preservation Program Analyst



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

October 20, 2020

Mandy Ranslow  
Program Analyst  
Advisory Council on Historic Preservation  
FHWA Liaison  
401 F Street, NW  
Washington, D.C. 20001-2637

RE: **Section 106 Consultation: Architectural Resources Survey Addendum**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Ms. Ranslow:

For your information, enclosed is the *Architectural Resources Survey Addendum: I-81 Viaduct Project*, prepared for the I-81 Viaduct project (the Project) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). The New York State Department of Transportation (NYSDOT) is transmitting this report to the Federal Highway Administration (FHWA).

The addendum survey report supplements the evaluation of historic resources presented in the report entitled *Architectural Resources Survey: I-81 Viaduct Project*, dated September 2016. The *Architectural Resources Survey Addendum* takes into account proposed project modifications and refinements, updated information from the New York State Historic Preservation Office (SHPO) Cultural Resource Information System (CRIS), and changes in existing conditions since 2016. These changes and updates to the previous evaluation of historic resources are summarized in the enclosed addendum report.

In a letter dated October 14, 2020 (enclosed), the SHPO concurred with the eligibility recommendations for the additional properties identified in the *Architectural Resources Survey Addendum*. Appendix A of the enclosed report, the Updated Building Eligibility Assessment Table, represents the final list of National Register-listed and eligible buildings, structures and historic districts within the area of potential effects (APE) for the Project.

If you have any questions, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

*Angelo Trichilo*

10/20/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment



AT/cl/bb

Encl: *Architectural Resources Survey Addendum: I-81 Viaduct Project (September 2020)*  
Letter from the SHPO, October 14, 2020

cc: R. Davies, FHWA (w/out encl.)  
J. Gross, FHWA (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
M. Frechette, NYSDOT (w/out encl.)



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

October 20, 2020

Jared A. Gross, P.E.  
Area Engineer  
Federal Highway Administration, NY Division  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

RE: **Section 106 Consultation: Architectural Resources Survey Addendum**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Gross:

Enclosed is the *Architectural Resources Survey Addendum: I-81 Viaduct Project*, prepared for the I-81 Viaduct project (the Project) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). The New York State Department of Transportation (NYSDOT) is transmitting this report to the Advisory Council on Historic Preservation (ACHP).

The addendum survey report supplements the evaluation of historic resources presented in the report entitled *Architectural Resources Survey: I-81 Viaduct Project*, dated September 2016. The *Architectural Resources Survey Addendum* takes into account proposed project modifications and refinements, updated information from the New York State Historic Preservation Office (SHPO) Cultural Resource Information System (CRIS), and changes in existing conditions since 2016. These changes and updates to the previous evaluation of historic resources are summarized in the enclosed addendum report.

In a letter dated October 14, 2020 (enclosed), the SHPO concurred with the eligibility recommendations for the additional properties identified in the *Architectural Resources Survey Addendum*. Appendix A of the enclosed report, the Updated Building Eligibility Assessment Table, represents the final list of National Register-listed and eligible buildings, structures, and historic districts within the area of potential effects (APE) for the Project. Based on the provided documentation and consultation with the SHPO, the NYSDOT respectfully requests the concurrence of the Federal Highway Administration (FHWA) that the identification of historic architectural properties within the APE has been completed.

If you have any questions, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

*Angelo Trichilo*

10/20/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

Encl: *Architectural Resources Survey Addendum: I-81 Viaduct Project (September 2020)*  
Letter from the SHPO, October 14, 2020

cc: R. Davies, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
M. Frechette, NYSDOT (w/out encl.)



**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

October 26, 2020

Mr. Angelo Trichilo, PE  
Acting Director, Office of Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Re: FHWA  
Interstate 81 (I-81) Viaduct Project/PIN 3501.60  
I-81 at 690, City of Syracuse, Onondaga County, NY  
16PR06314  
PIN 3501.60

Dear Mr. Trichilo, PE:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the submitted materials in accordance with Section 106 of the National Historic Preservation Act of 1966.

Based upon the review, the SHPO has no concerns or comments regarding *the EDR Phase IB Archaeological Survey: Shovel Testing Report (Revised September 2020)*. The SHPO concurs 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.

If you have any questions, I can be reached at [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov).

Sincerely,

A handwritten signature in cursive script that reads "Nancy Herter".

Nancy Herter  
Archaeology Unit Program Coordinator



Department of  
Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

October 30, 2020

Faithkeeper Anthony Gonyea  
DYODIHWASNYE'NHA  
Administration Building  
4040 Route 11  
Onondaga Nation  
via-Nedrow, NY 13120

RE: **Section 106 Consultation: Phase IB Archaeological Survey: Shovel Testing**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Faithkeeper Gonyea:

On September 25, 2020, the New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), transmitted the report entitled *Phase IB Archaeological Survey: Shovel Testing* for the I-81 Viaduct Project (the Project) for concurrent review by the Onondaga Nation and the State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800). Comments were requested by October 27, 2020.

Attached, please find a copy of the SHPO's letter on the *Phase IB Archaeological Survey: Shovel Testing*. The SHPO has no concerns or comments regarding the report and concurs that no additional testing is warranted.

The NYSDOT respectfully requests comments from the Onondaga Nation based on your review of the *Phase IB Archaeological Survey: Shovel Testing* report. If you have any questions concerning Phase IB shovel testing or the content of this report, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

On behalf of the FHWA, we appreciate your continued participation in the Section 106 process for this project and look forward to continuing consultation with the Onondaga Nation.

Sincerely,

*Angelo Trichilo*

10/30/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb



Encl: Letter from Nancy Herter, NYSOPRHP/SHPO, October 26, 2020

cc: Onondaga Council of Chiefs (w/ encl.)  
Chief Sidney Hill (w/ encl.)  
A. Lowry, Onondaga Nation (w/ encl.)  
R. Davies, FHWA (w/out encl.)  
J. Gross, FHWA (w/out encl.)  
M. Ranslow, ACHP (w/out encl.)  
J. Bonafide, NYSOPRHP/SHPO (w/out encl.)  
N. Herter, NYSOPRHP/SHPO (w/out encl.)  
M. Frechette, NYSDOT (w/out encl.)

**LAW OFFICE OF JOSEPH J. HEATH**  
GENERAL COUNSEL FOR THE ONONDAGA NATION  
512 JAMESVILLE AVENUE  
SYRACUSE, NEW YORK 13210-1502  
315-447-4851  
Facsimile  
315-475-2465

November 4, 2020

Angelo Trichilio  
Deputy Chief Engineer/Acting Director, Office of Environment  
NYS Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Re: Onondaga Nation Comments on Phase IB Archaeological Survey Shovel Tests  
(Revised) for I-81 Viaduct Project

Dear Mr. Trichilio:

After discussing this report with Anthony Gonyea, I am providing the following comments on behalf of the Onondaga Nation. Specifically, the Nation objects to the decision not to conduct shovel tests in areas that were identified as “previously disturbed” or that include fill material. For reasons discussed in prior correspondence, the Nation believes that even previously disturbed areas and areas containing fill material, including “cut and fill embankments,” may contain cultural artifacts that could be further damaged or destroyed during construction. Shovel tests should be conducted in these areas to protect any cultural artifacts that may be present.

Over the past two years, the New York State Department of Transportation (NYS DOT) has conducted pre-construction investigation in the form of shovel tests within the Area of Potential Effects (APE) for direct effects for the I-81 Viaduct project. According to the Revised Phase IB Archaeological Survey report, shovel tests were limited to sensitive areas that were not previously disturbed and were not covered by fill material (specifically, fill material extending to or below the deepest point of excavation). Based on document review, 66 acres within the APE were initially identified as requiring shovel tests. However, based on a subsequent walkover, NYS DOT excluded 53 of the initially identified 66 acres from pre-construction investigation (shovel tests) because the areas were identified as previously disturbed or as being composed of fill. In addition, 347 acres were recently added to the project’s APE and the bulk of these supplemental areas (338.5 acres) were excluded from pre-construction assessment for the same reasons. The Nation does not agree with this decision.

In our experience, cultural artifacts and human remains are frequently encountered in areas of historic Onondaga activity, even where soils have previously been disturbed. Within the past

two years alone, human remains were discovered on at least two sites undergoing construction that had not been considered sensitive, in part, because of prior construction in or near the site. The APE for this project includes areas around Onondaga Lake and the original configuration of Onondaga Creek that have been central to the Onondaga Nation from time immemorial. These areas are particularly likely to have hosted villages, fishing and hunting camps, and primary travel routes and to contain the cultural artifacts and burial sites typically associated with those uses.

In addition, as documented in archaeological surveys done for this project, early construction in Syracuse by European settlers involved cutting away hilltops within and adjacent to the City and using those unscreened soils to build roadways, level construction areas, or serve as fill in wetlands or low-lying areas. Excavation in this older fill material may uncover cultural artifacts or partial human remains that were moved with hill-top soils to their current locations. These cultural artifacts may have been scattered during transport, meaning that they may be in smaller pieces or isolated from each other and therefore easily overlooked or not recognized as cultural artifacts by untrained workers.

This concern about transportation of cultural artifacts within unscreened fill material is not without precedent or basis. Within the last few days, Nancy Herter of the State Historic Preservation Office (SHPO) notified Mr. Gonyea that human remains believed to be Onondaga were discovered under a house in Cicero, New York. The homeowner encountered the remains when he was digging beneath the house to install insulation. Given the composition of the surrounding materials, those remains appear to have been transported to that location in a load of unscreened fill used to build up the area beneath the home. The potential for cultural artifacts to be transported in unscreened fill was also highlighted in a 2005 Supplemental Phase 1A Report for the Proposed Highland Meadows Subdivision in Lysander, NY (OPRHP Project Review # 05PR0373) by Alliance Archaeological Services. In this report, archaeologist Nikki Waters found a soil borrow pit on the likely site of an historic Onondaga village. She suggested that the cultural artifacts normally associated with a village site were absent because they were removed with the soil fill – and, arguably, transported to wherever that fill was used. Both of these incidents support the Nation’s concerns that unscreened fill materials taken from areas in and around Syracuse may contain cultural artifacts or human remains. For that reason, excluding areas from assessment because they include fill deposits, such as the multiple “cut-and-fill highway embankment areas” excluded from review in this project, is not warranted.

The Nation strongly recommends that the NYS DOT revisit its decision to exclude previously disturbed areas, particularly areas with unscreened fill materials, from direct pre-construction investigation. Shovel tests should be extended to these areas. If not, special precautions should be taken during construction to ensure that any cultural artifacts or human remains that may be present are properly identified and protected. At minimum, as suggested in prior letters from the Nation, the NYS DOT should commit to incorporating on-site Cultural Resource Monitors on all open construction sites and to training construction workers to recognize the soils and other physical characteristics of areas likely to contain cultural artifacts or human

Re: Revised Phase 1B Archaeology Survey for I-81 Viaduct Project

November 4, 2020

Page 3

remains, to recognize the types of artifacts most likely to be encountered, and to respond appropriately if artifacts or human remains are encountered.

Sincerely,

*Alma L. Lowry*

Alma L. Lowry, Of Counsel

cc: Onondaga Council of Chiefs  
Anthony Gonyea, Section 106 Representative/Onondaga Nation  
Joe Heath, General Counsel/Onondaga Nation  
Jared Gross, Federal Highway Administration, New York Division

**LAW OFFICE OF JOSEPH J. HEATH**  
GENERAL COUNSEL FOR THE ONONDAGA NATION  
512 JAMESVILLE AVENUE  
SYRACUSE, NEW YORK 13210-1502  
315-447-4851  
Facsimile  
315-475-2465

November 4, 2020

Angelo Trichilio  
Acting Director, Office of Environment  
NYS Department of Transportation  
50 Wolf Road  
Albany, NY 12232

**Re: Site Monitoring and Worker Training  
I-81 Viaduct Project**

Dear Mr. Trichilio:

In a March 17, 2020 letter to Dan Hitt, then-Director of the Office of Environment, the Onondaga Nation requested that, given concerns about the archaeological sensitivity of many areas within the I-81 project and the limited pre-construction shovel testing being done, the New York State Department of Transportation (NYS DOT) hire Cultural Resource Monitors (CRMs) from the Nation to be present at all active construction sites and, particularly, construction in sensitive areas. In addition, we requested that the NYS DOT hire Nation staff and/or consultants to train construction workers to recognize areas of potential cultural importance. This was our second request for on-site monitors and worker training (see Letter of November 8, 2019 from Alma Lowry to Dan Hitt). Since we have not received a final response to either letter, we are renewing this request and clarifying that we believe both the on-site monitoring and worker training should be done by consultants chosen or recommended by the Nation.

As indicated in our earlier letter, the Nation believes that a Cultural Resource Monitor (CRM) chosen or approved by the Nation should be present at all active construction locations and that a supervising archaeologist chosen by the Nation should be available for consultation and immediate response if artifacts are encountered. As the NYS DOT acknowledges, the I-81 project is taking place in areas of moderate to high sensitivity for Native artifacts. The Area of Potential Effects (APE) includes New York State Museum sites associated with the Onondaga Nation, areas of known Native American habitation based on other historic records, and areas that the Nation recognizes as sensitive due to their proximity to historic waterways. As a result, there is a significant possibility of cultural artifacts or human remains being present within the



**Re: Cultural Resource Monitors and Trainers for I-81 Viaduct Project**

November 4, 2020

Page 2

construction area. Given the level of prior disturbance, these artifacts may be scattered or appear isolated, making them more difficult for non-experts to identify.

Dedicated CRMs chosen by or from the Nation will be more likely to observe and properly identify cultural artifacts, particularly scattered or isolated artifacts, for three reasons. First, they will be focused exclusively on this task rather than dividing their attention between construction and monitoring. Second, they will have the necessary experience and/or training to make the appropriate call. Third, CRMs from the Onondaga Nation will bring an added level of familiarity with the soils and other characteristics of areas most likely to contain cultural artifacts and with the kinds of cultural artifacts that might be encountered. All these characteristics make Nation-chosen CRMs particularly valuable to the I-81 project and the cost of their work should be borne by the project applicant and incorporated into the project budget.

In addition, because there may be multiple areas of active construction during this project and Nation-selected CRMs may not be available to observe all of them, the Nation is also requesting that NYS DOT provide training for its construction crews. This training would give workers a basic understanding of the soil types and physical characteristics of areas likely to contain artifacts, the types of artifacts mostly likely to be encountered, and the proper response to finding obvious or possible cultural artifacts or human remains. As noted in our prior letter, Tiffany Lee would be an ideal candidate to design and conduct this training. She is a Nation citizen who has been working with Anthony Gonyea on this project and is familiar with the area and the assessments that have already been done. She is currently finishing her doctorate in archaeology, has specialized in bioarchaeology and the identification of human remains, and has previous experience as a CRM for construction sites. Her educational background, field experience, and skills make her invaluable as a trainer.

More detail about the reasons behind our request for Nation-selected CRMs and trainers can be found in our March 17, 2020 and November 8, 2019 letters. We look forward to discussing these proposals in more detail in the near future.

Sincerely,

*Alma L. Lowry*

Alma L. Lowry, Of Counsel

cc: Onondaga Council of Chiefs  
Anthony Gonyea, Section 106 Representative/Onondaga Nation  
Joe Heath, General Counsel/Onondaga Nation  
Jared Gross, Federal Highway Administration, New York Division  
Tricia Millington, Federal Highway Administration



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

**New York Division**

November 7, 2020

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
NewYork.FHWA@dot.gov

In Reply Refer To:  
HPD-NY

Angelo Trichilo, P.E.  
Deputy Chief Engineer, Acting Director, Office of Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Subject: PIN 3501.60 - Architectural Resources Survey Addendum  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse  
Onondaga County

Dear Mr. Trichilo:

Please reference your October 20 letter requesting our review of the Architectural Resources Survey Addendum (ARSA) prepared for the subject project and concurrence that the identification of historic architectural properties with the area of potential effects (APE) has been completed. The New York State Department of Transportation (NYSDOT) requested the New York State Historic Preservation Office (SHPO) provide concurrence with the eligibility recommendations for the additional properties identified in the ARSA in a letter dated October 1, 2020. The SHPO concurred with the eligibility recommendations for the additional properties identified in the ARSA in a letter dated October 14.

Based on our review and subsequent telephone discussion on October 29, the ARSA satisfactorily meets the requirements of 36 CFR 800.4(a-c) regarding the identification and evaluation of historic architectural properties. Since the alternatives under consideration consist of corridors or large land areas, including areas currently inaccessible for archaeological investigations, the identification and evaluation of all historic properties cannot be completed at this time. As such, a phased approach to identify and evaluate archaeological resources will be required as allowed by 36 CFR 800.4(b)(2). It is the Federal Highway Administration's (FHWA) understanding the phased identification and evaluation of historic properties is limited to archaeological properties, and therefore concurs that the identification of architectural properties within the APE as documented in the ASRA is complete.

It is the FHWA's expectation that a Programmatic Agreement executed pursuant to 36 CFR 800.14(b)(1)(ii) will clearly document previously identified historic architectural properties and

archaeological properties for which final identification is being deferred, as well as protocols to reassess the APE and scope of identification efforts in the event of design changes.

If you have any questions, please feel free to contact me at (518) 431-8855.

Sincerely,

Jared A. Gross, P.E.  
Area Engineer

cc: J. Bonafide, NYSHPO (16PR06314)  
M. Ranslow, ACHP  
M. Frechette, I-81 Project Director, NYSDOT, Region 3  
J. Prockup, Office of Environment, NYSDOT  
R. Davies, District Engineer, FHWA, HPD-NY



## Department of Transportation

ANDREW M. CUOMO  
Governor

MARIE THERESE DOMINGUEZ  
Commissioner

December 2, 2020

Jared A. Gross, P.E.  
Area Engineer  
Federal Highway Administration, NY Division  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207

RE: **SECTION 106 CONSULTATION: REQUEST FOR APPROVAL OF SECTION 106  
CONSULTING PARTY STATUS**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Gross:

Please find enclosed for consideration by the Federal Highway Administration (FHWA), a request for Section 106 Consulting Party status for the I-81 Viaduct Project, submitted to the New York State Department of Transportation (NYSDOT) in accordance with 36 CFR Part 800.2(c)(5):

*Certain individuals and organizations with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties, or their concern with the undertaking's effects on historic properties.*

The enclosed request was submitted via e-mail on November 17, 2020. The NYSDOT Office of Environment, in coordination with the NYSDOT Region 3 office, has reviewed the enclosed request and recommends that John Auwaerter, acting on behalf of the Historic Oakwood Cemetery Preservation Association (HOCPA), be granted Consulting Party status based on his written statement of interest.

We respectfully request FHWA approval of John Auwaerter and the HOCPA, granting Consulting Party status for participation in the Section 106 process.

If you have any questions, please feel free to contact Jessica Prockup at [Jessica.Prockup@dot.ny.gov](mailto:Jessica.Prockup@dot.ny.gov).

Sincerely,

*Angelo Trichilo*  
12/2/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

Encl: John Auwaerter, Section 106 Consulting Party e-mail request, November 17, 2020

cc: R. Davies, FHWA (w/out encl.)

M. Ranslow, ACHP (w/out encl.)

J. Bonafide, NYSOPRHP/SHPO (w/out encl.)

M. Frechette, NYSDOT (w/out encl.)





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

**New York Division**

December 4, 2020

Leo W. O'Brien Federal Building  
11A Clinton Avenue, Suite 719  
Albany, NY 12207  
518-431-4127  
Fax: 518-431-4121  
NewYork.FHWA@dot.gov

In Reply Refer To:  
HPD-NY

Angelo Trichilo, P.E.  
Deputy Chief Engineer, Acting Director, Office of Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Subject: PIN 3501.60 - Section 106 Consulting Party Status  
Interstate 81 Viaduct Project  
City of Syracuse, Onondaga County

Dear Mr. Trichilo:

We have received your December 2 letter transmitting a request for Section 106 consulting party status on the Interstate 81 Viaduct Project. After reviewing the information contained in the individual request, we have approved the following to be a consulting party to the Section 106 process for the subject project:

- John Auwaerter, Board Member, and acting on behalf, of the Historic Oakwood Cemetery Preservation Association (HOCPA) with expressed concern with the undertaking's effects on the historic Oakwood Cemetery

Consulting party status entitles this individual to share views, receive and review pertinent information, offer ideas and consider possible solutions together with the Federal Highway Administration, New York State Department of Transportation, and other consulting parties.

If you have any questions, please feel free to contact me at (518) 431-8855.

Sincerely,

Jared A. Gross, P.E.  
Area Engineer

cc: J. Bonafide, OPRHP  
M. Ranslow, ACHP  
M. Frechette, Project Director, NYSDOT, Region 3  
R. Davies, FHWA, HPD-NY



December 18, 2020

Alma L. Lowry, Esq.  
Law Office of Joseph J. Heath  
General Counsel for the Onondaga Nation  
512 Jamesville Avenue  
Syracuse, NY 13210-1502

RE: **Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Ms. Lowry:

As part of continuing consultation among the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the Federal Highway Administration (FHWA), and the New York State Department of Transportation (NYSDOT) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800), thank you for providing comments on behalf of the Onondaga Nation based on review of the report entitled *Phase IB Archaeological Survey: Shovel Testing* (October 2020), prepared for the I-81 Viaduct Project (the Project).

In your letter dated November 4, 2020, the Onondaga Nation recommends that shovel testing should be conducted in areas identified as “previously disturbed” and areas that include fill material as outlined and depicted in the *Phase IB Archaeological Survey Work Plan* (Work Plan, October 2017), and updated with the identification of previous disturbance in additional areas resulting from a subsequent walkover reconnaissance survey by archaeologists. The Onondaga Nation cites examples of recent discoveries of cultural artifacts and human remains encountered in areas of historic Onondaga activity where soils have been previously disturbed.

The NYSDOT acknowledges the Nation’s concern regarding the potential presence of cultural artifacts or human remains in previously disturbed soils or in fill materials transported from other locations. Regarding this issue, we recognize that the Nation has a different perspective from that presented in the archaeological reports prepared in accordance with Section 106 requirements for the identification of historic and archaeological resources.

Historic properties subject to Section 106 review include artifacts that are related to and located within archaeological sites that meet the criteria for National Register of Historic Places eligibility (36 CFR 800.16(l)(1)). In order to be eligible for the National Register, 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. Instead, testing occurs only when the depth of project impacts may exceed the depth of fill or ground disturbance, indicating potential impacts to intact underlying soils.

This approach is consistent with established archaeological standards, including the *State Historic Preservation Office Phase I Archaeological Report Format Requirements* and the Work Plan developed as part of Section 106 consultation for this Project.

The *Phase 1A Archaeological Sensitivity Assessment: I-81 Viaduct Project* (September 2016) confirmed disturbance in large portions of the Project's area of potential effects (APE), informing a testing strategy that eliminated specified areas from shovel testing. In areas of identified sensitivity where the depth of project-related impacts exceeds the depth of documented disturbance or fill, and also exceeds the limits of hand testing, the Work Plan incorporates machine-assisted excavation prior to construction.

The Project's team of archaeologists has completed the pre-construction shovel testing portion of archaeological investigations and the *Phase 1B Archaeological Survey: Shovel Testing* report summarizes the findings. To date, no National Register eligible archaeological sites have been identified. In a letter dated October 26, 2020, the SHPO indicated that it has no concerns or comments regarding the report and concur that no additional shovel testing is warranted. The NYSDOT therefore does not support further preconstruction shovel testing in areas of previous ground disturbance.

In your letter, the Onondaga Nation recommends incorporating on-site Cultural Resource Monitors on all open construction sites and training for construction workers to recognize the soils and other physical characteristics of areas likely to contain cultural artifacts and human remains. The NYSDOT also received the Nation's separate letter dated November 4, 2020 with a similar request for on-site monitors and worker training and plans to address that request under separate cover.

If the Onondaga Nation has any additional concerns, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. Thank you for your interest and continuing participation in Section 106 consultation for this Project.

Sincerely,

*Angelo Trichilo*

12/18/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

cc: Onondaga Council of Chiefs  
Chief Sidney Hill  
A. Gonyea, Onondaga Nation Faith Keeper  
R. Davies, FHWA  
J. Gross, FHWA  
M. Ranslow, ACHP  
J. Bonafide, NYSOPRHP/SHPO  
N. Herter, NYSOPRHP/SHPO  
M. Frechette, NYSDOT



December 21, 2020

Alma L. Lowry, Esq.  
Law Office of Joseph J. Heath  
General Counsel for the Onondaga Nation  
512 Jamesville Avenue  
Syracuse, NY 13210-1502

RE: **Section 106 Consultation**  
PIN 3501.60  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York  
OPRHP 16PR06314

Dear Ms. Lowry:

As part of continuing consultation for the I-81 Viaduct Project (the Project) among the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the Federal Highway Administration (FHWA), and the New York State Department of Transportation (NYSDOT) in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800), the NYSDOT would like to address the Nation's proposal regarding on-site monitoring and cultural resource training for construction workers.

In your letter dated November 4, 2020, the Onondaga Nation requests that the NYSDOT hire Cultural Resource Monitors and trainers from the Nation and/or consultants chosen by the Nation due to concerns regarding the potential presence of cultural artifacts or human remains within the construction area for the Project. In response to your letter, the NYSDOT would appreciate the opportunity to hear more about the Nation's perspective and to discuss the proposal to provide on-site construction monitors and training.

In coordination with the FHWA, we would like to schedule a conference call in January 2021 to consider and discuss ways to address the Nation's concerns as the Project moves forward. Please let us know the availability of the Nation's representatives to meet via conference call on the following dates or offer alternate dates for a virtual meeting at your convenience.

January 20, 2:30 pm – 4:00 pm  
January 22, 10:00 am – 11:30 am

We look forward to a meeting in the next few weeks. If you have questions, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642. Thank you for your interest and continuing participation in Section 106 consultation for this Project.

Sincerely,

*Angelo Trichilo*

12/21/2020

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/jp/bb

cc: Onondaga Council of Chiefs  
Chief Sidney Hill  
A. Gonyea, Onondaga Nation Faith Keeper  
R. Davies, FHWA  
J. Gross, FHWA  
M. Ranslow, ACHP  
J. Bonafide, NYSOPRHP/SHPO  
N. Herter, NYSOPRHP/SHPO  
M. Frechette, NYSDOT





January 8, 2021

John A. Bonafide  
Director, Technical Preservation Services Bureau  
Division for Historic Preservation  
Agency Historic Preservation Officer  
NYS Office of Parks, Recreation & Historic Preservation  
Peebles Island State Park - P.O. Box 189  
Waterford, New York 12188-0189

RE: **Section 106 Consultation: Phase IB Archaeological Survey: Shovel Testing**  
PIN 3501.60 (OPRHP 16PR06314)  
Interstate 81 (I-81) Viaduct Project  
City of Syracuse, Onondaga County, New York

Dear Mr. Bonafide:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), and in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementing regulations (36 CFR Part 800), is writing to inform the New York State Historic Preservation Office (SHPO) that the report entitled *Phase IB Archaeological Survey: Shovel Testing* (September 2020), prepared for the I-81 Viaduct Project, has been finalized.

The NYSDOT provided the *Phase IB Archaeological Survey: Shovel Testing* to the SHPO, the Onondaga Nation, and the Tuscarora Nation on September 25, 2020. The SHPO responded on October 26, 2020 that the SHPO had no concerns or comments regarding the report. The Tuscarora Nation did not provide any comments. The Onondaga Nation, in a letter dated November 4, 2020, provided no comments regarding the report; however, they recommended that shovel testing should be conducted in areas identified as “previously disturbed.” The NYSDOT and the FHWA have considered the Nation’s recommendation to extend shovel testing to previously disturbed areas and areas with fill materials. Based on established standards for archaeological survey, the approved *Phase IB Archaeological Survey Work Plan* for the Project, and the opinion of the SHPO that no additional shovel testing is warranted, the NYSDOT, in coordination with the FHWA, concluded that systematic efforts to locate cultural artifacts in disturbed soils or soils composed of fill would be outside the scope of Section 106 review. Therefore, the NYSDOT does not support further preconstruction shovel testing in areas of previous ground disturbance. The NYSDOT considers the *Phase IB Archaeological Survey: Shovel Testing* finalized and no changes to the report have been made since the SHPO’s previous review.

With the conclusion of Phase IB shovel testing, additional archaeological investigations will be carried out as outlined in the *Phase IB Archaeological Survey Work Plan* using mechanical excavation and archaeological monitoring during construction.

The NYSDOT respectfully requests written concurrence from the SHPO on the results of the shovel testing as presented in the *Phase IB Archaeological Survey: Shovel Testing*. If you have

any questions concerning review of this report, please contact Jessica Prockup at [jessica.prockup@dot.ny.gov](mailto:jessica.prockup@dot.ny.gov) or 518-417-6642.

Sincerely,

Angelo Trichilo, P.E.  
Deputy Chief Engineer  
Acting Director, Office of Environment

AT/cl/bb

cc: R. Davies, FHWA  
J. Gross, FHWA  
M. Ranslow, ACHP  
N. Herter, NYSOPRHP/SHPO  
M. Frechette, NYSDOT



**Parks, Recreation,  
and Historic Preservation**

**ANDREW M. CUOMO**  
Governor

**ERIK KULLESEID**  
Commissioner

January 11, 2021

Mr. Angelo Trichilo, PE  
Acting Director, Office of Environment  
New York State Department of Transportation  
50 Wolf Road  
Albany, NY 12232

Re: FHWA  
Interstate 81 (I-81) Viaduct Project/PIN 3501.60  
I-81 at 690, City of Syracuse, Onondaga County, NY  
16PR06314  
PIN 3501.60

Dear Mr. Trichilo, PE:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed your January 8, 2021 *Section 106 Consultation: Phase IB Archaeological Survey: Shovel Testing Letter* in accordance with Section 106 of the National Historic Preservation Act of 1966.

Based upon this review, the SHPO concurs with the results of the Phase IB Archaeological Survey Report: Shovel Testing. Based on these results, no further Phase IB shovel testing is warranted and additional archaeological survey work will be carried out using mechanical excavation and archaeological monitoring during construction.

If you have any questions, I can be reached at [nancy.herter@parks.ny.gov](mailto:nancy.herter@parks.ny.gov).

Sincerely,

A handwritten signature in black ink that reads "Nancy Herter".

Nancy Herter  
Archaeology Unit Program Coordinator