Appendix E-7
Correspondence

Table of Contents

From USDOT FHWA to Onondaga Nation, regarding Section 106 Consultation for Interstate 81 Viaduct Project; June 16, 2014
From USDOT FHWA to Advisory Council on Historic Preservation (ACHP), regarding PIN 3501.60 Interstate 81 Viaduct Project; June 16, 2014
From USDOT FHWA to NYSDOT, regarding PIN 3501.60 Interstate 81 Viaduct Project Section 106 Consulting Party Status; November 19, 2014
From USDOT FHWA to ACHP, regarding PIN 3501.60 Interstate 81 Viaduct Project Section 106 Consultation Process; April 11, 2016
From NYSDOT to OPRHP, regarding I-81 Viaduct Project Section 106 Review Process - Area of Potential Effects; September 6, 2016
From OPRHP to NYSDOT, regarding APE, Architectural Resources Survey, and Phase 1A Archaeological Study; September 22, 2016
From NYSDOT to FHWA, regarding Phase 1A Archeological Sensitivity Assessment, Architectural Resources Survey; September 27, 2016
From NYSDOT to Law Office of Joseph Heath, regrading regarding Phase 1A Archeological Sensitivity Assessment, Architectural Resources Survey; September 30, 2016
From Onondaga Nation to NYSDOT, regarding I-81 Project; November 14, 2016
From NYSDOT to OPRHP, regarding Architectural Resources Survey; November 21, 2016
From OPRHP to NYSDOT, regarding review of additional Architectural Resources; December 7, 2016
From NYSDOT to OPRHP, regarding Architectural Resources Survey; December 21, 2016
From NYSDOT to Onondaga Nation, regarding Interstate 81 Project OPRP 16 PRO6314; May 19, 2017
From OPRHP to NYSDOT, regarding Phase 1B Work Plan; July 19, 2017
From NYSDOT to OPRHP, regarding Phase 1A Archaeological Sensitivity Report CRIS Submission; September 14, 2017
From NYSDOT to OPRHP, regarding Phase 1A Archaeological Resources Survey Report CRIS Submission; September 25, 2017
From OPRHP to NYSDOT, regarding FHWA I-81 Viaduct Project; October 2, 2017
From NYSDOT to OPRHP, regarding Plan for Phase 1B Archaeological Survey and Archaeological Monitoring During Construction including Data Recover; October 10, 2017
From NYSDOT to FHWA, regarding Plan for Phase 1B Archaeological Survey and Archaeological Monitoring During Construction including Data Recover; October 10, 2017
From NYSDOT to Thane Joyal, Esquire, regarding Phase 1B Archaeological Survey Work Plan OPRHP Project Review 16PRO6314; October 10, 2017
From NYSDOT to FHWA, Request for Approval of Section 106 Consultation Party Status; October 30, 2017
From OPRHP to NYSDOT, regarding Phase 1B Work Plan; November 3, 2017
From FHWA to NYSDOT OOE, regarding Section 106 Consulting Party Status; November 7, 2017
From FHWA to Tuscarora Environment Office, regarding Section 106 Consultation; September 13, 2018
From NYSDOT to FHWA, regarding Request for Approval of Section 106 Consulting Party Status I-81 Viaduct Project; September 21, 2018
From Douglas Armstrong to NYSDOT, regarding Urban Archaeology and Cultural Heritage of the I-81 Corridor; January 24, 2018
From Onondaga Nation to NYSDOT, concerning Sensitivity Designations, Site Monitoring, and Worker Training, November 8, 2019
From Onondaga Nation to NYSDOT, concerning Site Monitoring and Worker Training, March 17, 2020
From NYSDOT to OPRHP, regarding Phase 1B Archaeological Survey; September 25, 2020
From NYSDOT to Onondaga Nation, regarding Phase 1B Archaeological Survey; September 25, 2020
From NYSDOT to Tuscarora Nation, regarding Phase 1B Archaeological Survey; September 25, 2020
From NYSDOT to Onondaga Nation, regarding Additional Copies of Phase 1B Work Plan; September 25, 2020
From NYSDOT to OPRHP, regarding Section 106 Consultation: Architectural Resources Survey Addendum; October 1, 2020
From OPRHP to NYSDOT, regarding Architectural Resources Survey Addendum; October 14, 2020
From NYSDOT to ACHP, transmitting Architectural Resources Survey Addendum; October 20, 2020
From NYSDOT to FHWA, transmitting Architectural Resources Survey Addendum; October 20, 2020
From OPRHP to NYSDOT, comments on Phase IB Survey, October 26, 2020
From NYSDOT to Onondaga Nation, transmitting OPRHP comments on Phase 1B Archeological Survey; October 30, 2020

From Onondaga Nation to NYSDOT, regarding Site Monitoring and Worker Training for I-81 Viaduct Project; November 4, 2020
From Onondaga Nation to NYSDOT, regarding Onondaga Nation Comments on Phase 1B Survey; November 4, 2020
From FHWA to NYSDOT, concurrence with Architectural Resources Survey Addendum for I-81 Project; 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, comments on Site Monitoring and Worker Training, December 21, 2020
From NYSDOT to OPRHP, request for concurrence with Phase IB Survey, January 8, 2021
From OPRHP to NYSDOT, concurrence with Phase IB Survey, January 11, 2021
From NYSDOT to OPRHP, Request concurrence with Finding Document, February 10, 2021
From OPRHP to NYSDOT, Concurrence with Finding Document, March 4, 2021
From NYSDOT to Consulting Parties, Sample letter, Invitation to Consulting Party Meeting, March 12, 2021
From NYSDOT to Onondaga Nation, Invitation to Consulting Party Meeting, March 15, 2021
From NYSDOT to Tuscarora Nation, Invitation to Consulting Party Meeting, March 15, 2021
From NYSDOT to FHWA, Transmit Finding Document, March 22, 2021
From NYSDOT to OPRHP, regarding Section 106 Consultation: Finding Document; April 8, 2021
From OPRHP to NYSDOT, Concurrence Finding Document updates, April 12, 2021
From NYSDOT to FHWA, Request for Approval of Section 106 Consultation Party Status, April 14, 2021
From OPRHP to NYSDOT, 4(f) Properties, April 15, 2021
From FHWA to NYSDOT, Section 106 Consulting Party Status, April 16, 2021
From NYSDOT to FHWA, Request 4(f) Determination, April 20, 2021
From FHWA to ACHP, Section 106 Coordination, April 23, 2021
From FHWA to NYSDOT, Concurrence Finding Document, April 23, 2021
From FHWA to NYSDOT, concerning Section 4(f) De Minimis Consultation, May 4, 2021
From Onondaga Nation to FHWA, regarding the Draft Programmatic Agreement Outline, May 12, 2021
From NYSDOT to OPRHP, regarding Section 106 Supplement – Noise Barrier 16A&B, May 28, 2021 (Memo enclosed from EDR to NYSDOT for the I-81 Viaduct Project dated May 14, 2021)
From NYSDOT to FHWA, regarding Response to Onondaga Nation Comments, June 18, 2021 (Memo enclosed from EDR to NYSDOT dated May 21, 2021)
From OPRHP to NYSDOT, Concurrence regarding Section 106 Supplement – Noise Barrier 16A&B, June 21, 2021
From FHWA to Onondaga Nation, concerning Section 106 Consultation Response to Comments, June 21, 2021
From NYSDOT to FHWA, concerning a new representative change of a Consulting Party, July 26, 2021 (Correspondence enclosed from AIA CNY dated July 15, 2021).
From NYSDOT to FWHA, Response to Consulting Party Comments, August 19, 2021
From NYSDOT to Consulting Parties, regarding Finding Documentation and Programmatic Agreement, November 9, 2021
From NYSDOT to Onondaga Nation, concerning Section 106 Consultation: Revised Draft Programmatic Agreement, November 10, 2021
From NYSDOT to Onondaga Nation, submission of revised Section 106 Consultation: Revised Draft Programmatic Agreement, based on Onondaga Nation Comments, December 3, 2021
From Onondaga Nation to NYSDOT, concerning Revised Draft Programmatic Agreement, December 23, 2021
From NYSDOT to Onondaga Nation, send Revised Draft Programmatic Agreement, January 20, 2022
From Onondaga Nation to NYSDOT, concerning Revised Draft Programmatic Agreement, February 24, 2022

U.S. Department of Transportation
Federal Highway Administration

New York Division

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Albany, NY 12207
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Fax: 518-431-4121
New York.FHWA@dot.gov

In Reply Refer To:
HED-NY

June 16, 2014

Chief Irving Powless, Jr.
Onondaga Nation
Box 319B
Nedrow, New York 13120

Subject: Section 106 Consultation
Interstate 81 Viaduct Project
City of Syracuse
Onondaga County, New York

Dear Chief Irv Powless:

The Federal Highway Administration (FHWA) would like to initiate consultation with the Onondaga Nation for the proposed Interstate 81 (I-81) Viaduct Project, an undertaking subject to Section 106 of the National Historic Preservation Act. 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). Enclosed for your information is a map showing the project study area.

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; and other alternatives such as the Western Bypass and West Street (includes converting the existing highway to a non-interstate facility and realigning I-81 along a new right of way). 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.

We invite you to meet with FHWA and NYSDOT representatives to discuss and consider your views about the project and its potential to affect properties of religious and cultural significance to the Onondaga Nation. Based on the current project schedule, we anticipate a meeting at the NYSDOT Region 3 office in Syracuse toward the end of the summer. NYSDOT staff will contact you shortly to confirm a date and time, based on your availability.

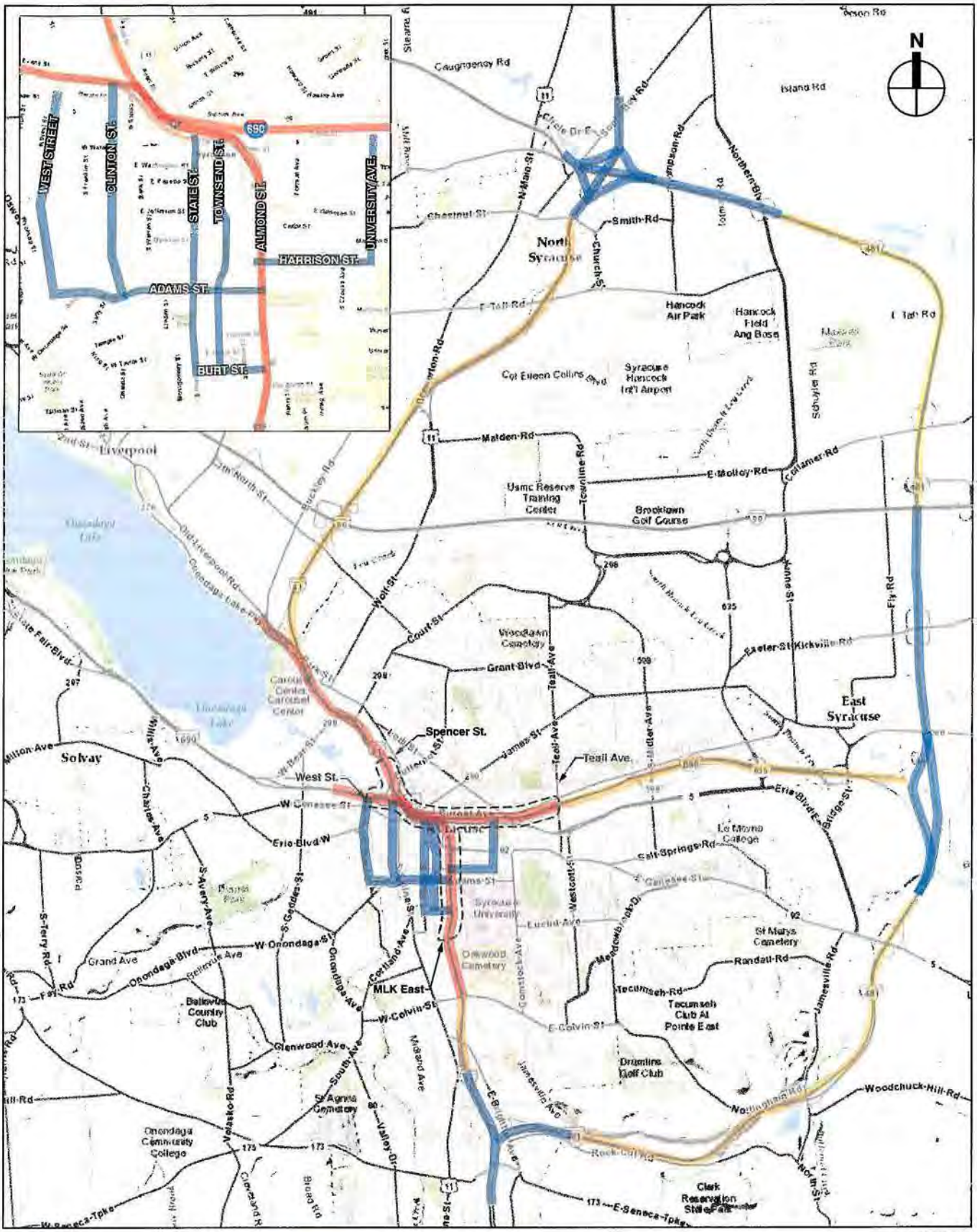
On behalf of FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the I-81 Viaduct Project. If you have any questions or would like to discuss the project, please contact Tricia Millington at (518) 431-8844.

Sincerely,

Robert M. Davies
District Engineer

Encl: Project Location Maps showing Area of Potential Effect (APE) for Direct Effects

cc: Ruth Pierpont, OPRHP
Kelly Fanizzo, ACHP
Mark Frechette, Project Director, Region 3, NYSDOT
Daniel Hitt, Director, Environmental Science Bureau, NYSDOT
John Bonafide, OPRHP/SHPO
Tony Gonyea, Onondaga Nation


N
VEST STREET
CLINTON ST.
STATE ST.
TOWNSEND ST.
ALMOND ST.
UNIVERSITY AVE.
HARRISON ST.
ADAMS ST.
BURT ST.
690
Caughdenoy Rd
Island Rd
Chestnut St
Smith Rd
North Syracuse
Hancock Air Park
Hancock Field Ang Base
Col Eileen Collins Blvd
Syracuse Hancock Int'l Airport
Malden Rd
E Molloy Rd
Usmc Reserve Training Center
Brooklawn Golf Course
Liverpool
Onondaga Lake
Onondaga Lake Pkwy
Solvay
Milton Ave
West St.
W Genesee St
Erie Blvd W
Spencer St.
Teall Ave.
Grant Blvd
Court St
North St
Woodlawn Cemetery
Exeter St
Kirkville Rd
East Syracuse
Erie Blvd E
Bridge St
Le Moyne College
Salt Springs Rd
James St
Westcott St
Euclid Ave
Syracuse University
Oakwood Cemetery
St Marys Cemetery
Randall Rd
Tecumseh Rd
Tecumseh Club At Pointe East
Jamesville Rd
Onondaga Blvd
W Onondaga St
Grand Ave
Bellevue Ave
Fay Rd
Ballantyne Country Club
MLK East
W Colvin St
E Colvin St
Glenwood Ave
Drumlins Golf Club
Woodchuck Hill Rd
St Agnes Cemetery
Onondaga Community College
Valley Dr
Velasko Rd
Rock Cut Rd
Clark Reservation State Park
E Seneca Tpke
W Seneca Tpke
I-81 Viaduct Priority Area
Project Limits (All Alternatives)
Potential Expanded Project Limits for Street-Level Alternatives
Potential Additional Analysis areas for Street-Level Alternatives
0
3 MILES
SCALE

U.S. Department of Transportation
Federal Highway Administration

New York Division

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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,

Robert M. Davies
District Engineer

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

U.S. Department of Transportation
Federal Highway Administration

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November 19, 2014

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

RECEIVED
NOV 20 2014
OFFICE OF ENVIRONMENT

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

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April 11, 2016

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

NEW YORK STATE OF OPPORTUNITY
Department of Transportation

ANDREW M. CUOMO
Governor

MATTHEW J. DRISCOLL
Commissioner

Cathy Calhoun
Chief of Staff

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. 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

50 Wolf Road Albany, NY 12232 | www.dot.ny.gov

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

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/NYSDOT
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.

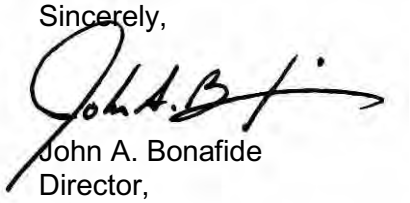
However, the NYSHPO also found that 9 of the 302 properties newly identified in the report as not being eligible for the National Register did, in our opinion, meet the National Register eligibility criteria. This change raises the total number of NRE resources from the proposed 104 to 113.

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.

Sincerely,



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

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

Attachment: 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 Buri	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 & MALTBIE 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- Folke	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 F	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 19th and early 20th 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 Dolphin 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 Faste	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 Build	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 P	Viaduct	**NR-listed (91NR00249)**	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 C	Viaduct	**NR-Listed (90NR03310)**	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 or 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 Sylves	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 E	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 F	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 F	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	**NR-listed (Non-Contributing within the Hanover Square Historic District 2014 Expansion)**				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/R	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 C	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	**NR-listed (Individually) and NR-eligible (Contributing to the Hanover Square Historic District 2014 Expansion)**	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	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	132	GENESEE ST E/ Franklin Building	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	122-26	GENESEE ST E/ Franklin Building	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	134-36	GENESEE ST E/ Franklin Building (134) Pos	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	200	GENESEE ST E/ Granger Block	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District) (06740. 013179)**				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 C	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 Snowdon 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-19th 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 Jose	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 Ches	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 Commerci	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	**NR-listed(within the North Salina Street Historic District 1999 Expansion) (06740.001732)**				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 Commerc	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	**NR-listed (Non-contributing to the South Salina Street Downtown Historic District 2014 Expansion)**				NRL	NRL
Syracuse	501-23	SALINA ST S	Viaduct			X			Not NRE
Syracuse	500-50	SALINA ST S/ Chimes Building	Viaduct	**NR-listed (Contributing to the South Salina Street Downtown Historic District 2014 Expansion)**				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	106MONT(	ST/ Engine House #1	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 000646)**				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		***NRE**
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 th	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 Foo	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 20th 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 Hous	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 W	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 19th and early 20th centuries and as an intact example of late 19th 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	**NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (90NR02109)**	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	**NR-listed (Contributes to Hanover Square Historic District 2014 Expansion)**				NRL	NRL
Syracuse	257	WATER ST E	Viaduct	**NR-listed (Open space within Hanover Square Historic District [no Contributing status])**				NRL	NRL
Syracuse	301	WATER ST E & ERIE BLVD E/ Weighlock Bu	Viaduct	**NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (90NR02097)**	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 War	Viaduct	**NR-listed (06NR05624)**	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.

NEW YORK STATE OF OPPORTUNITY | 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 IA 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 or 518-417-6642.

Sincerely,

Daniel P. Hitt, RLA
Director, Office of Environment

DH/los/jp/ms

Encl: I-81 Viaduct Project – Phase IA 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)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MATTHEW J. DRISCOLL
Commissioner

Cathy Calhoun
Chief of Staff

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 IA 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 IA 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 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.

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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 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,

Thane Joyal, Esq.

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

NEW YORK STATE OF OPPORTUNITY. 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 19th and early 20th 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 19th 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 or 518-417-6642.

Sincerely,

Daniel P. Hitt, RLA
Director, Office of Environment

DH/los/ms

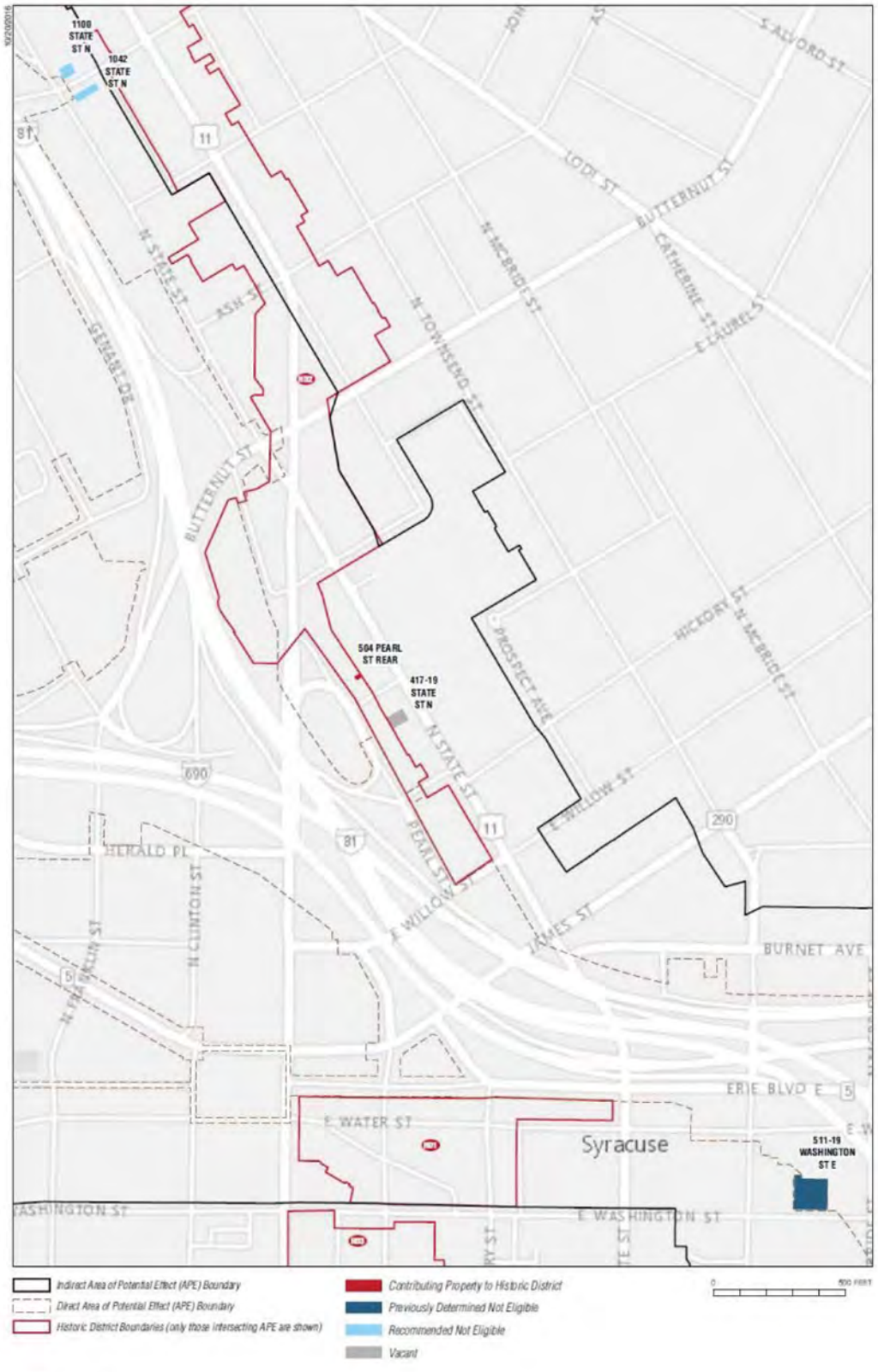
Encl: Attachment 1 - Additional Properties Map
Attachment 2 - Photos
Attachment 3 - Historic Resource Inventory Form for Pioneer Homes

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)

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Attachment 1: Additional Properties Map

Attachment 1



I-81 Viaduct Project

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Attachment 2: Photos

Attachment 2



Photo 1: 511-519 Washington Street East



Photo 2: 1042 North State Street


Photo 3: Another view of 1042 North State Street

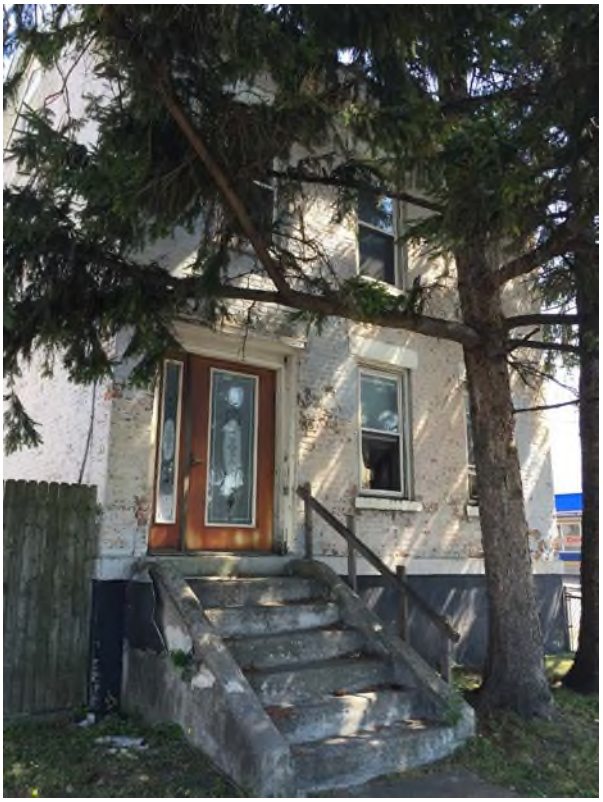


Photo 4: View 1 of 1100 North State Street



Photo 5: View 2 of 1100 North State Street



Photo 6: 204 Butternut Street



Photo 7: 500 North Salina Street



Photo 8: 501-505 North Salina Street



Photo 9: 507-13 North Salina Street

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Attachment 3: Historic Resource Inventory Form for Pioneer Homes

HISTORIC RESOURCE INVENTORY FORM

For NYSDOT Projects
New York State Education Department Cultural Resources Survey Program Work Scope Specifications

NYS OFFICE OF PARKS, RECREATION
& HISTORIC PRESERVATION
P.O. BOX 189, WATERFORD, NY 12188
(518) 237-8643

Bernadette Castro
Commissioner

OFFICE USE ONLY

USN:

IDENTIFICATION

PROPERTY NAME (if any): Pioneer Homes

ADDRESS OR STREET LOCATION: Bounded by Adams Street, S. Townsend St, E. Taylor St, and Renwick Ave

COUNTY: Onondaga TOWN: Syracuse VILLAGE:

ORIGINAL USE: Public housing project CURRENT USE: Public housing project

ARCHITECT/BUILDER (if known): Randall King Vedder & King Date Built: 1938-1940

DESCRIPTION

Please check those that are applicable

Exterior Walls:	☐ wood clapboard	☐ wood shingle	☐ vertical boards	☐ stone
☒ brick	☐ poured concrete	☐ concrete block	☐ vinyl siding	☐ aluminum siding
☐ cement-asbestos	☐ not applicable			
Roof: ☒ asphalt	☐ wood shingle	☐ metal	☐ slate	☐ unknown
Foundation:	☐ stone	☐ brick	☒ poured concrete	☐ concrete block
	☐ not applicable			

Alterations: Roof alterations, porch alterations, window replacements, construction of I-81 which traverses complex

Condition:	☐ excellent	☒ good	☐ fair	☐ overgrown
Associated Building:	☐ garage	☐ barns	☐ shed	☐ silo
☐ carriage house	☐ privy	☒ other		
Landscape Features:	☒ mature trees	☐ smaller trees	☒ bushes, hedges	
☐ slate sidewalk	☒ concrete sidewalk	☐ walls	☒ lawn	
Building Surroundings:	☐ open land	☐ woodland	☐ scattered buildings	☒ densely built-up
☐ commercial	☐ industrial	☐ residential	☐ agricultural	☐

PREPARED BY: NYSDOT Office of Environment, 50 Wolf Road, Albany, NY 12232
DATE: November 21, 2016
PIN: 3501.60
Form and Narrative Description Prepared By: Molly McDonald & Cameron Robertson, AKRF, Inc., 440 Park Avenue South, 7th Floor, New York, NY 10016

Narrative Description of Property:

The Pioneer Homes housing complex occupies eight square blocks of downtown Syracuse defined by East Taylor Street on the south, East Adams Street on the north, Renwick Avenue on the east, and South Townsend Street on the west. McBride Street and Almond Street/ Interstate [I]-81 run through the complex on a north-south orientation and Jackson Street and Monroe Street intersect it on an east-west orientation. Approximately 60 buildings and a park are located within the complex.

The two- and three-story brick buildings within the complex are generally rectangular in plan and are arranged in rows. The rows are placed along multiple small streets or "courts" that do not extend beyond the housing complex. Pairs of buildings along the terminus of each court have L-shaped plans facing inwards to contribute to the insular feeling of the complex. The section of the complex located to the east of I-81 includes several rows of residential buildings that run at an angle to the other buildings in the complex. The landscape includes trees, grass, and bushes. Concrete sidewalks lead to the doors of each housing unit and concrete sidewalks also run along the street frontages. Grassy areas are located along the street frontages within the complex as well as in the spaces between rows of buildings. A playground known as Wilson Park is located within the complex bounded by East Taylor, South McBride, Jackson Street, and Almond Street. The playground features play equipment and tennis courts as well as two buildings, which differ in style from the other buildings within the complex. One is a brick building located in the western portion of the park which has a flat roof and several modern features such sections of wall constructed of glass. The other building is a pavilion located in the southern portion of the park which is of relatively recent construction. A small flat-roofed brick Administration building, which is an original feature and is of a similar style and materials to the rest of the complex, is located at the intersection of Monroe and Almond Streets.

The vast majority of buildings within the complex are two- and three-story brick residential buildings. The rectangular-plan residential units are generally two stories in height and have gable roofs; the L-plan residential units are generally three stories in height and have hipped roofs. The gable ends of the roofs are sided in clapboard. The buildings are regularly fenestrated, typically with paired single-light sash. The entries to each unit are generally arranged in pairs; each pair of entrances is sheltered under a single gable-roofed entry porch. In some cases, these porches are enclosed features that project from the brick façade of the building; in some cases, the porches are open, with roofs supported by simple wood columns. While the buildings display minimal ornamentation, they do typically feature bands of darker colored brick and segments of dark-colored projecting bands beneath windows. These features lend the otherwise plain exteriors a textured, polychrome aspect.

Narrative Description of National Register Eligibility:

A Multiple Property Documentation Form (MPDF) prepared by the National Park Service (NPS) entitled "Public Housing in the United States, 1933-1949," provides a historic context and standards for evaluating housing projects built during that time period. The document identifies approximately 700 housing projects nationwide that were erected during this time period and reviews historical themes relevant to the evaluation of public housing projects. The MPDF notes that in general, housing projects built by the federal government during this period were intended to create "a new ordered environment, distinct from the squalor of the slums," as evinced through their design, form, and layout. Architectural styles include "functional modernism" as well as decorative styles such as Colonial, Georgian, and Spanish Colonial Revivals. Complexes typically exhibit order and repetition of design within the complex and include substantial open space elements. Federal public housing complexes constructed after 1937 (the period relevant to Pioneer Homes) "were generally built in the International Style, as the USHA found its 'no-frills architecture' well suited to both their agency's legislative and administrative cost restrictions. As a result, flat roofs, uniform fenestration, and little or no exterior ornamentation became defining features of the USHA-funded public housing complexes" (NPS 2004: E48).

The MPDF examines the criteria under which such properties may be eligible, including Criterion A for Social History, Politics/Government, and Community Development; Criterion B for association with an important national or local figure; Criterion C for Design/Construction, and Criterion D for Information Potential.

History of Pioneer Homes

With the National Housing Act of 1934, the practice of 'redlining' instituted informal discriminatory and segregational regulations in neighborhoods across the country. The 15th Ward of Syracuse, NY, the future site of the

Pioneer Homes, was one of these neighborhoods. The city government saw "not only the opportunity to acquire cheap land necessary for the projects but also unrepresented individuals who could not put much of a fight against their urban renewal plans" (Cortez 2013). Construction began in 1938, with the project taking a little over a year to complete. It was officially occupied in February of 1940. The Pioneer Homes were among the earliest federally funded public housing projects in the state of New York and the first in Syracuse. Many federally funded projects were constructed nationally during the years immediately preceding Pioneer Homes' construction and several preceded Pioneer Homes' construction in New York State. Federally funded housing projects that were built in New York State prior to Pioneer Homes include several examples in New York City, two in Buffalo, one in Lackawanna, and one in Schenectady. Several additional federal housing projects in New York State were completed in the same year as Pioneer Homes, including examples in Utica, Yonkers, and Buffalo (NPS 2004: Appendix I, p.17).

The homes were designed by architects Randall King Vedder & King, at the time a newly formed Syracuse partnership between two architecture firms of the city (Hardin & Crispin 1993: 131-132). The Pioneer Homes were initially built to house 678 units. These units, a mixture of 2- and 3-story walk ups, flats and row homes, were available to both families and the elderly (SHA, Hamlin 1944: 13-15). The project replaced four city blocks in the 15th Ward, "displacing nearly three thousand people and 314 homes and buildings (Case 2009: 118)." This project has been seen as being instrumental in the end of the area formerly known as 15th Ward of the city.

The project was designed in a manner so that the "buildings had neither fronts nor backs;" the architects wanted to make the space a useful feature for both the homes and the occupants (Hamlin 1944: 4). The row houses were built with relatively shallow porches. The apartment units themselves were critiqued by Talbot Hamlin, a respected New York architect and academic. He stated that:

> "they seem to have been designed with the standards and ideals of ordinary middle-class urban private rental developments in mind, rather than the effort to shelter the greatest number of persons adequately but with the greatest economy and the smallest area compatible with USHA standards" (Hamlin 1944: 14).

Looking into the actual construction of all the units within the Pioneer Homes project, the apartments, as well as the row homes and flats were built with maple parquet tiled styled flooring throughout every room, except for the kitchen and bathrooms. The flats and row houses were built using frame construction, finishing the buildings with a brick veneer (Hamlin 1944: 17). The second floor and the roof were finished with wood-joist construction. The walls, when the project was originally completed, were finished with a sand-finished plaster in the living rooms, bedrooms, and hallways. In the kitchens and bathrooms of the apartment units, washable plaster was used; however, this plaster was not used in those particular rooms of the flats or row homes (Hamlin 1944: 19).

When Hamlin looked at the details of the Pioneer Homes buildings, he stated that the apartments' facades gave a sufficient amount of contouring to make the buildings interesting at all times of day/year, yet, the row homes' and flats' exterior designs seemed to be forced (Hamlin 1944: 21). Overall though, he congratulated the architects of the project on the scale of all the buildings. Hamlin said that the "sizes and general arrangements seem all geared to human beings; to homes…everything has a certain intimacy" (Hamlin 1944: 22).

As illustrated in historic photographs of the complex taken in 1944, the original design included uniformly designed buildings with brick facades, concrete belt courses, flat roofs, and metal casement sash windows. Most of the buildings featured a slightly decorative wood pentice roof over the doorway to each unit; adding a slightly rustic quality to the otherwise modern buildings. In some cases, a small shallow hip-roofed porch sheltered paired entrances. The hipped-roof porches were clad in standing-seam metal and are supported by what appears to be metal supports featuring a diamond-shaped lattice. The historic photographs illustrate the original landscape of the complex as having concrete sidewalks leading to each unit door, as well grassy areas in front of and between buildings, trees, and bushes. The 1944 General Landscape Plan labels many of these grassy areas as "Drying Yards," presumably for laundry, and others as "Play" areas. Parking areas are also indicated on the plan. The plan indicates Wilson Park as being vacant of structures or other mapped features. However, a 1953 Sanborn fire insurance map illustrates a single-story "Wilson Recreation Center" building in the eastern portion of the park and a bath house flanked by two swimming pools in the southern portion of the park.

Evaluation

Pioneer Homes was constructed between 1938 and 1940 and 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. The complex relates to themes identified in the MPDF under Criterion A, under Social History and Community Planning and Development, as a federal planning effort to eliminate slums and provide low-cost housing for the urban poor at a local level. It also relates to Criterion C under Community Planning and Development as representing "an important or exemplary illustration of early large-scale housing development in which uniformity of design, low ground coverage, and precise spatial relationships and traffic patterns were combined to create a new environment for the urban poor in place of the squalor and congestion of the slums" (NPS 2004: F93-94).

A comparison of the original "General Landscape Plan" for the complex indicates that the layout of the buildings and the general landscape plan remain largely intact. The residential buildings that were originally constructed for the complex remain standing and few new structures have been added. Wilson Park, the recreational component of Pioneer Homes, has undergone some slight changes and is now a public facility. A building indicated in the plan as an Administration building at the corner of Almond and Monroe Streets remains in place. Therefore, the housing complex retains its original layout to a large extent and preserves a sense of the relationship of the buildings to each other. The original landscape too remains largely intact, including features such as concrete sidewalks, trees, and grassy areas. The setting of the complex was altered somewhat with the construction of I-81 viaduct, however, 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.

Comparison of the series of 1944 photographs with the present conditions indicates some alterations to the individual residential buildings. The original flat roof of each building within the complex has been replaced with a gable or hipped roof. Window openings throughout the complex have been retrofitted with single-light sash, which replace the original multi-light metal casement sash. In addition, the porches throughout the complex have been replaced. In place of the small pentice roofs sheltering individual unit doorways and shallow hipped roofs sheltering pairs of unit doorways, the current porches are gable-roofed features that extend further from each building and in many cases are enclosed with clapboard. Original features that survive include the red brick exterior accented with darker colored brick and dark-colored bands at the building corners.

Historic Maps: 1944 General Landscape Plan included in *Review and Report on Pioneer Homes, a Housing Development of the Syracuse Housing Authority*; and 1953 Sanborn Fire Insurance map.

Other Sources:

"Brief History of Syracuse Housing Authority."
n.d.*History of SHA*. Syracuse Housing Authority, n.d. Accessed online 15 Aug. 2016.

Case, Dick.
2009. *Remembering Syracuse*. Charleston.

Cortez, Leandro.
2013 "The 15th Ward: A History in the Shadows." *Upstate Modern*. Syracuse University, 23 Apr. 2013. Accessed online 15 Aug. 2016.

Hamlin, Talbot
1944 *Review and Report on Pioneer Homes, a Housing Development of the Syracuse Housing Authority*.

Hardin, Evamaria, and Jon Crispin.
1993 *Syracuse Landmarks: An AIA Guide to Downtown and Historic Neighborhoods*. Syracuse: Syracuse University Press.

National Park Service (NPS).
2004 *Multiple Property Documentation Form: Public Housing in the United States, 1933-1949*.

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Pioneer Homes Historic Resources Inventory Form Maps & Plans

11/17/2016



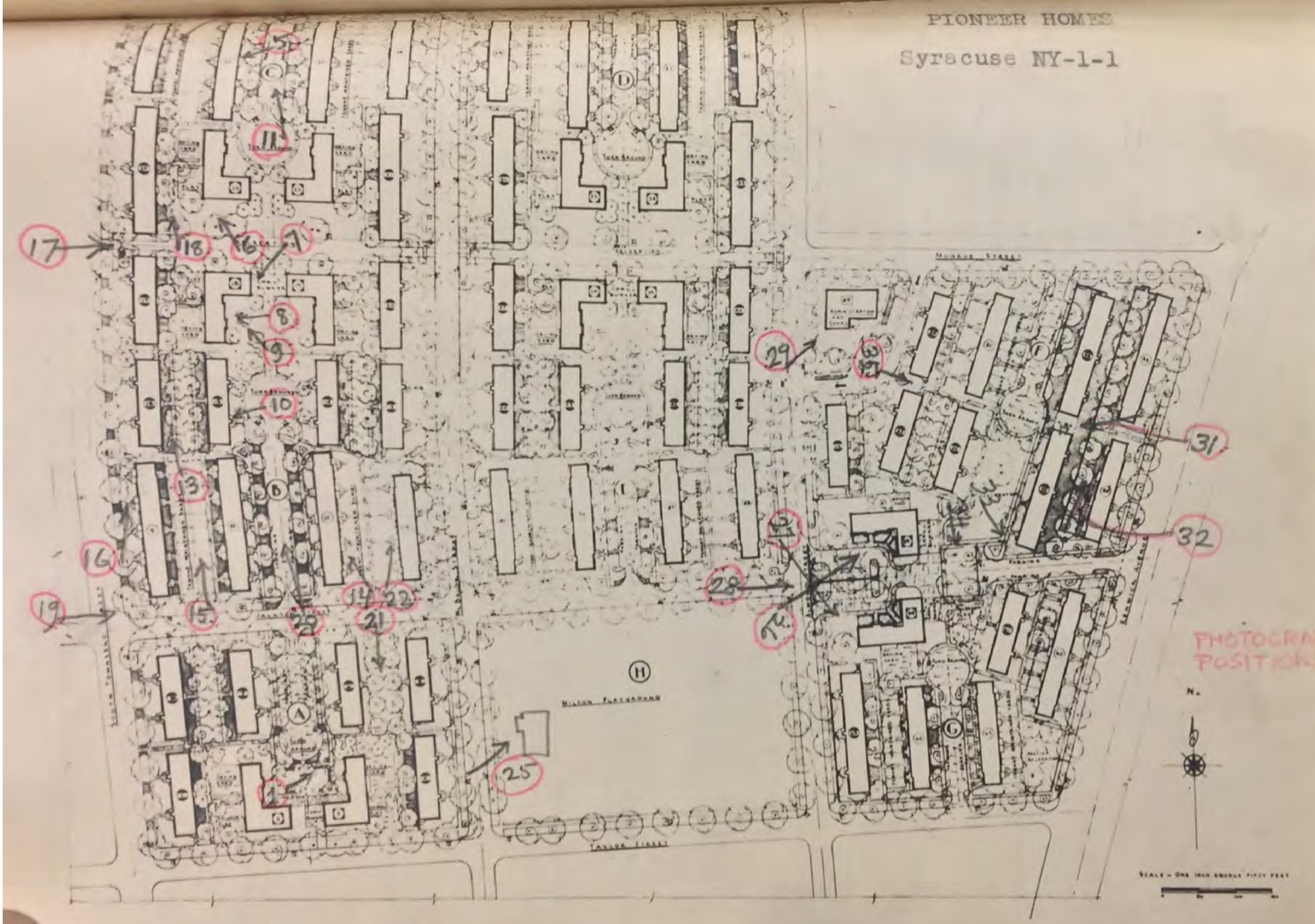
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Property Boundary

Pioneer Homes
Location Map

PIONEER HOMES

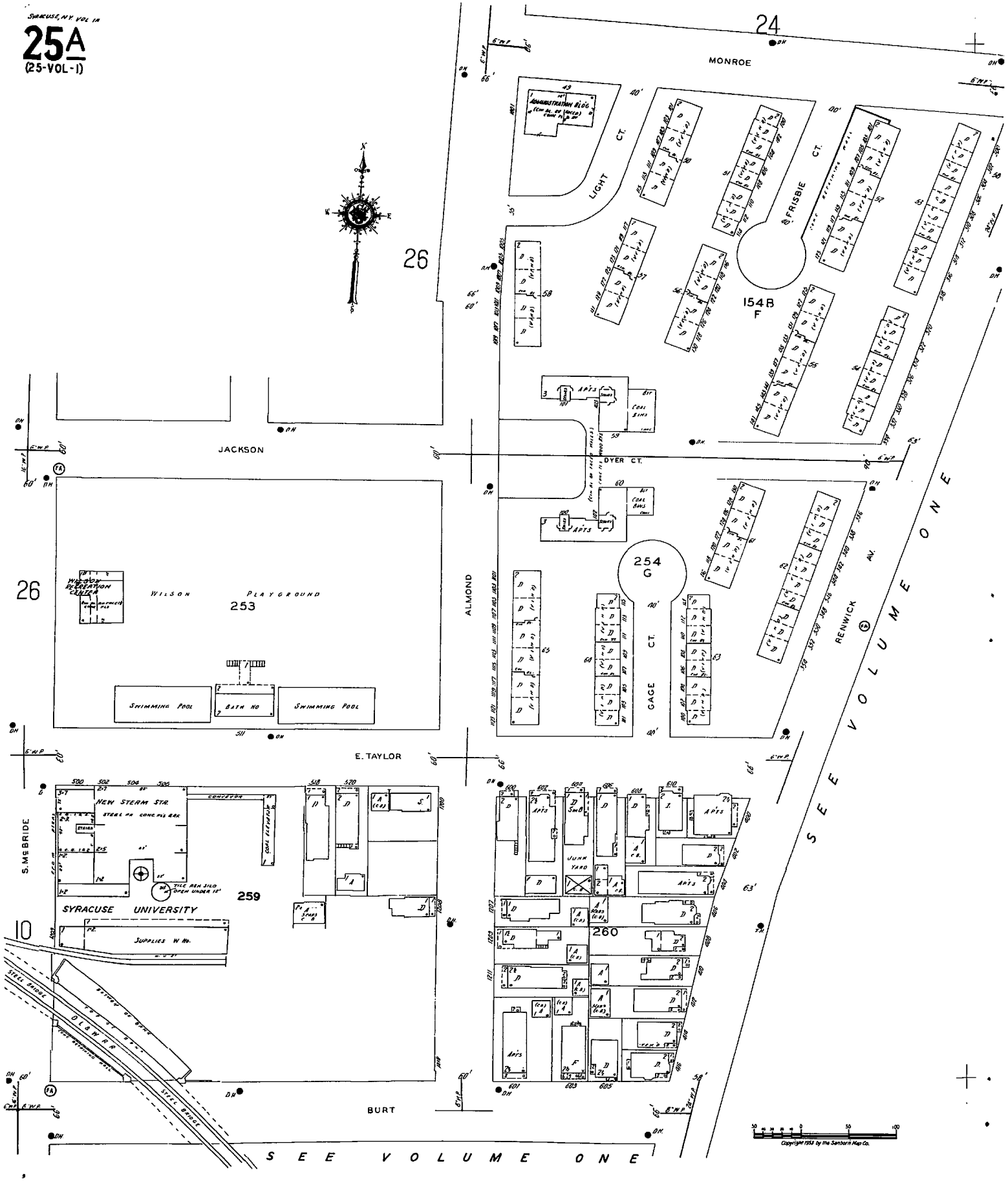
Syracuse NY-1-1

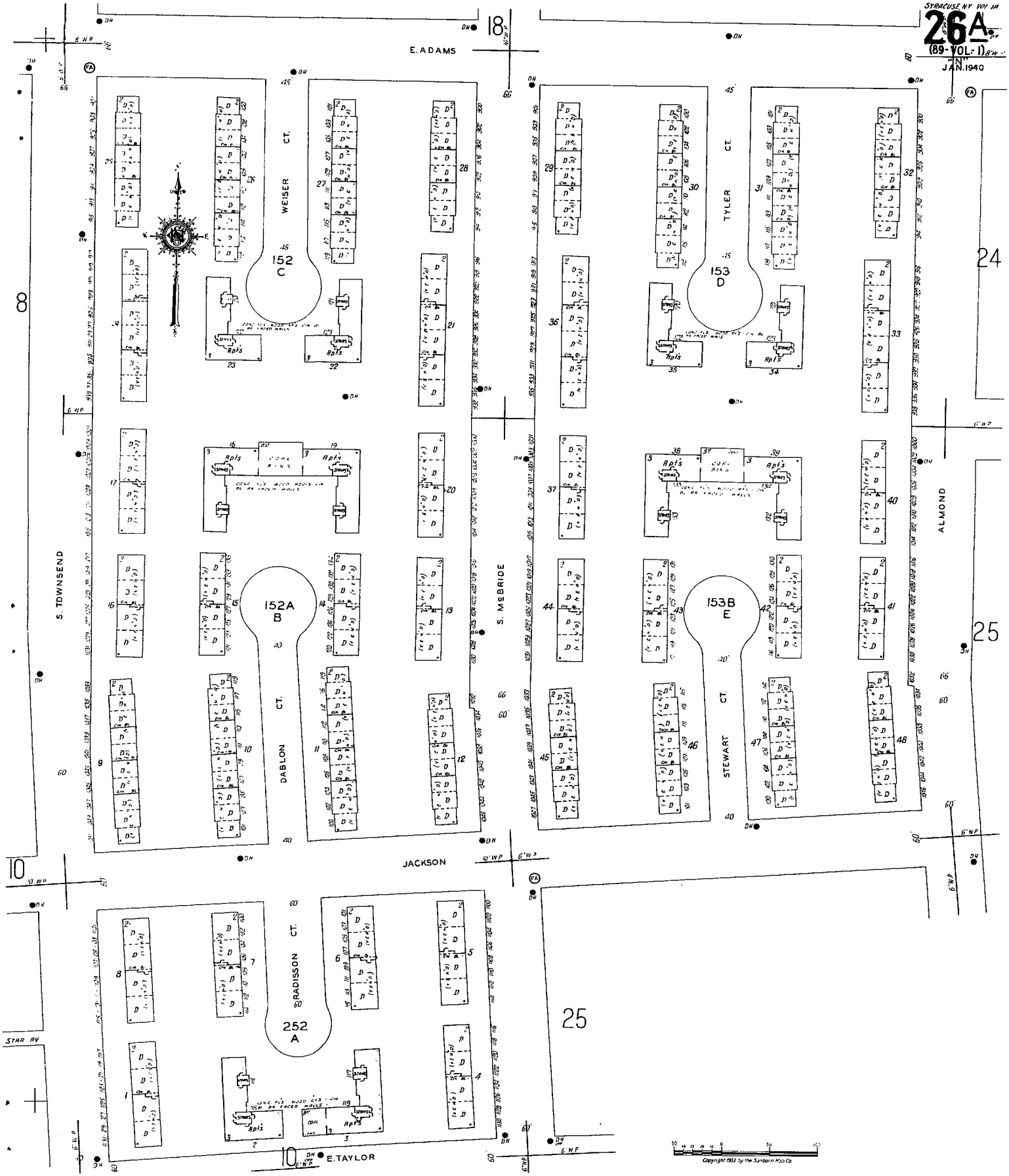


GENERAL NOTES.

GENERAL LANDSCAPE PLAN

REVISE


SYRACUSE, N.Y. VOL IA
25A
(25-VOL-1)
24
MONROE
LIGHT CT.
FRISBIE CT.
154B
F
26
JACKSON
DYER CT.
ALMOND
254
G
GAGE CT.
RENWICK AV.
WILSON RECREATION CENTER
WILSON PLAYGROUND
253
SWIMMING POOL
BATH HO
SWIMMING POOL
E. TAYLOR
S. McBRIDE
NEW STEAM STA.
SYRACUSE UNIVERSITY
259
SUPPLIES W HO.
10
JUNK YARD
260
BURT
SEE VOLUME ONE
SEE VOLUME ONE


SYRACUSE NY VOL 1A
26A
(89-VOL-1)
JAN. 1940
E. ADAMS
JACKSON
E. TAYLOR
S. TOWNSEND
S. McBRIDE
ALMOND
STAR AV
WEISER CT.
TYLER CT.
DABLON CT.
STEWART CT.
RADISSON CT.
152 C
153 D
152A B
153B E
252 A
18
24
25
8
10
Copyright 1951 by the Sanborn Map Co

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
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Pioneer Homes Historic Resources Inventory Form Photos


FIRST IN NEW YORK STATE
PIONEER HOMES
1939











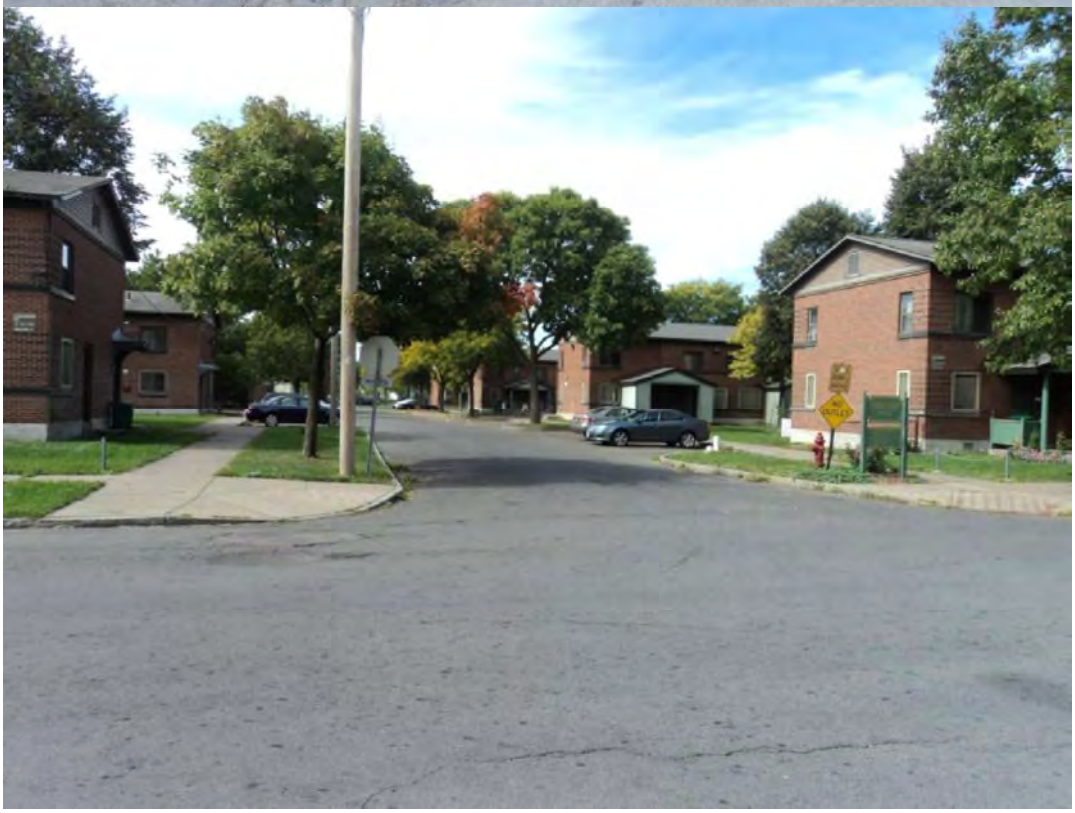


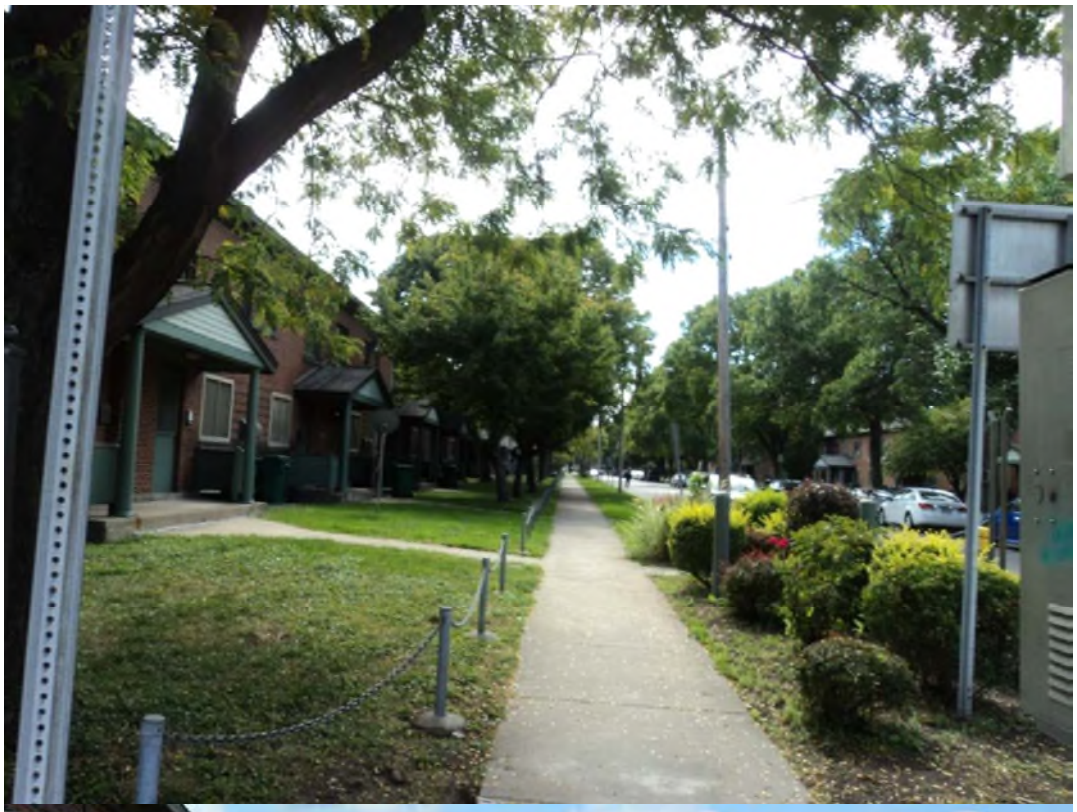



WILSON PARK
CITY OF SYRACUSE
DEPARTMENT OF
PARKS & RECREATION













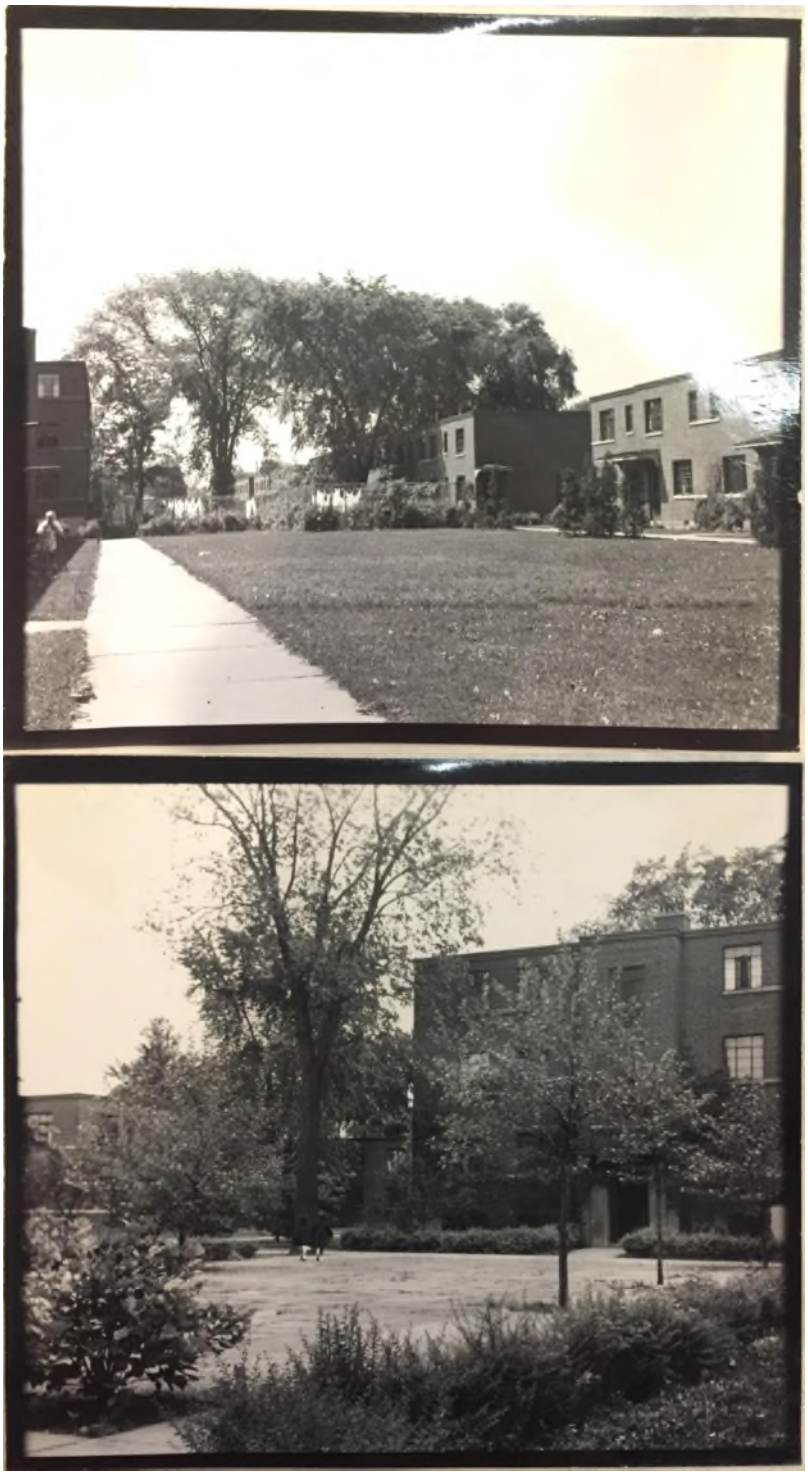

TO
SOUTH
81





Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Pioneer Homes Historic Photos















































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 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.

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.

Sincerely,



Kathleen A. Howe
Survey and Evaluation Coordinator

NEW YORK STATE OF OPPORTUNITY. 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 or 518-417-6642.

Sincerely,

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)

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Attachment 1: Photos

Attachment 1

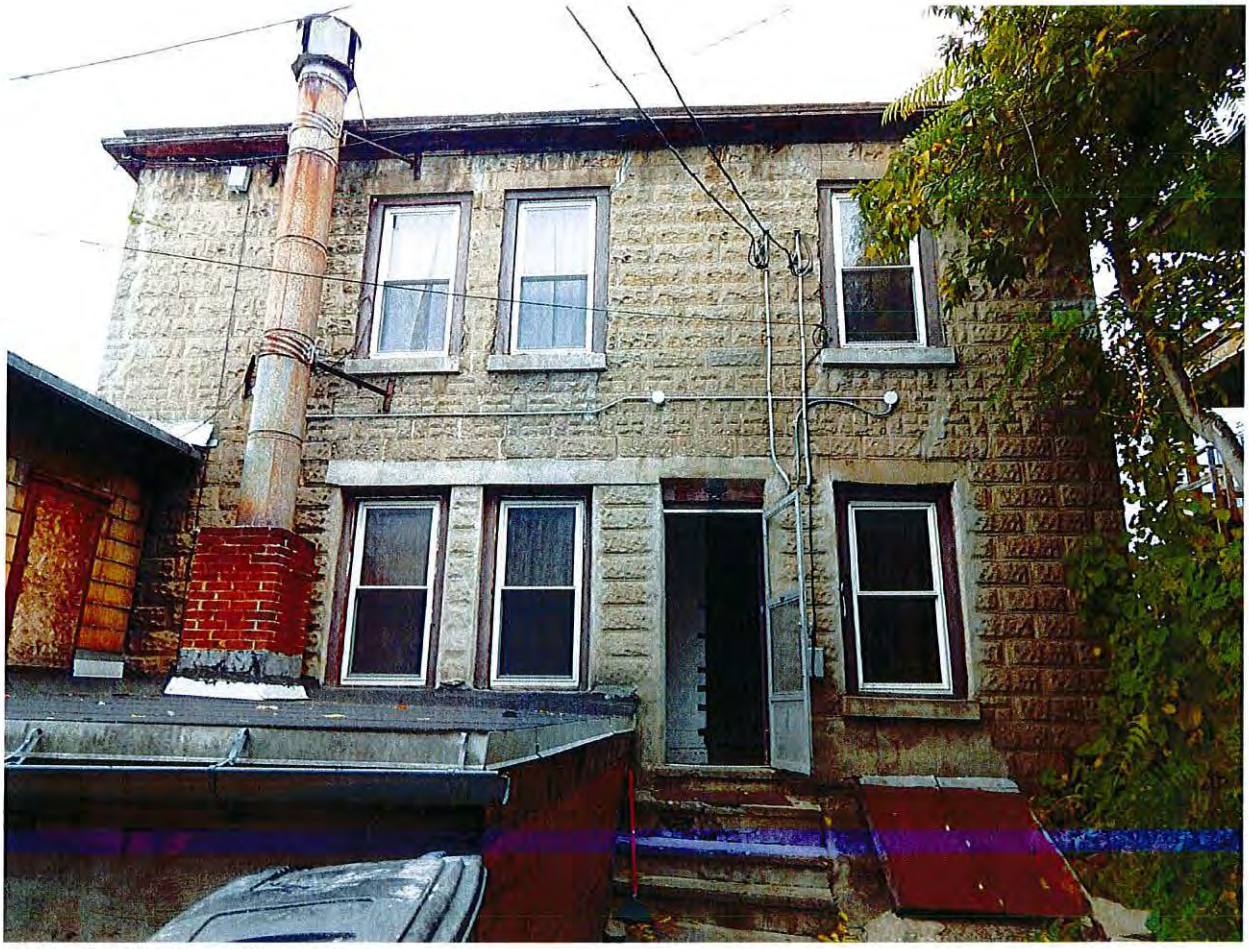


Photo 1: 504 Pearl Street Rear

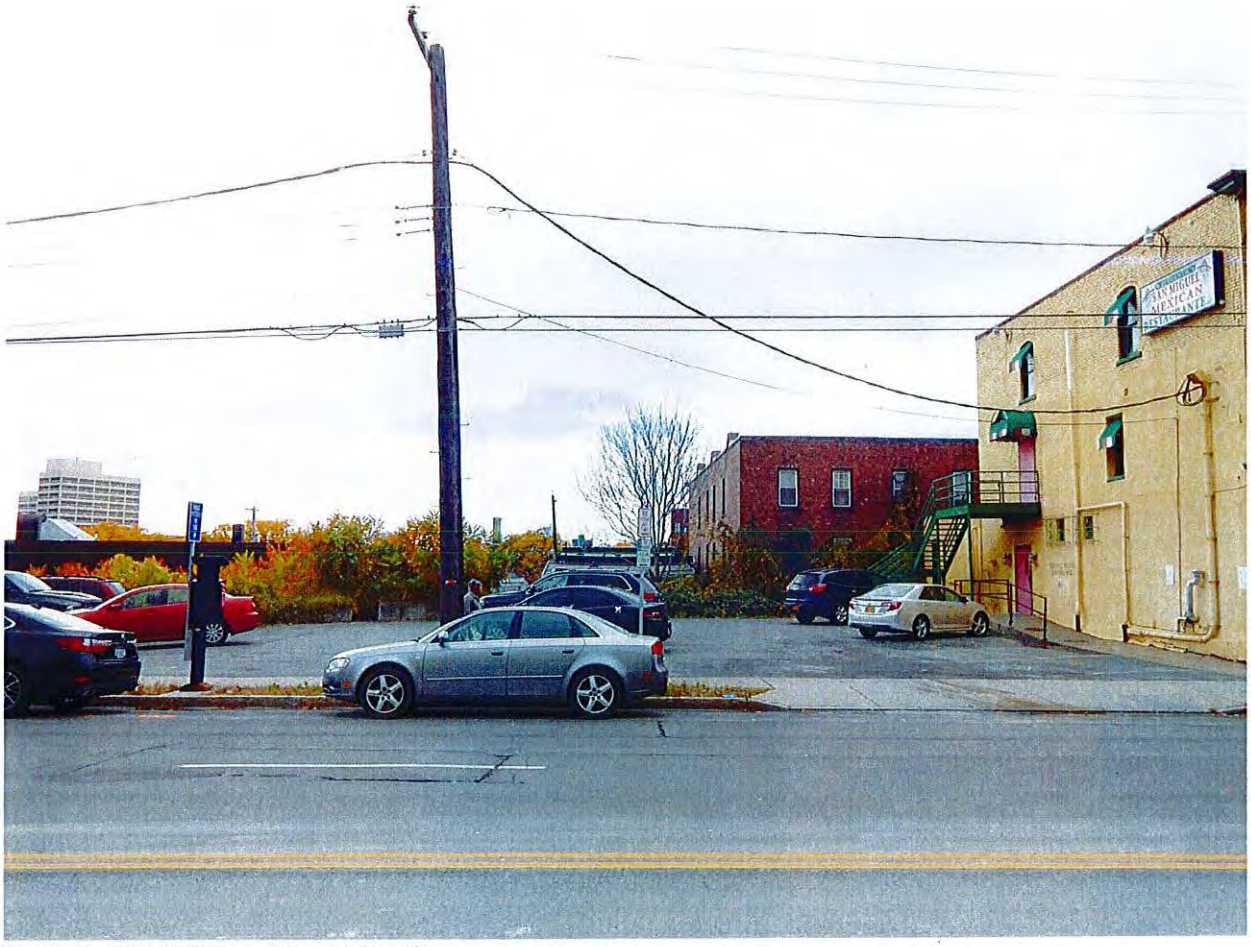


Photo 2: 417-419 State Street North



Photo 3: 205 Hickory Street

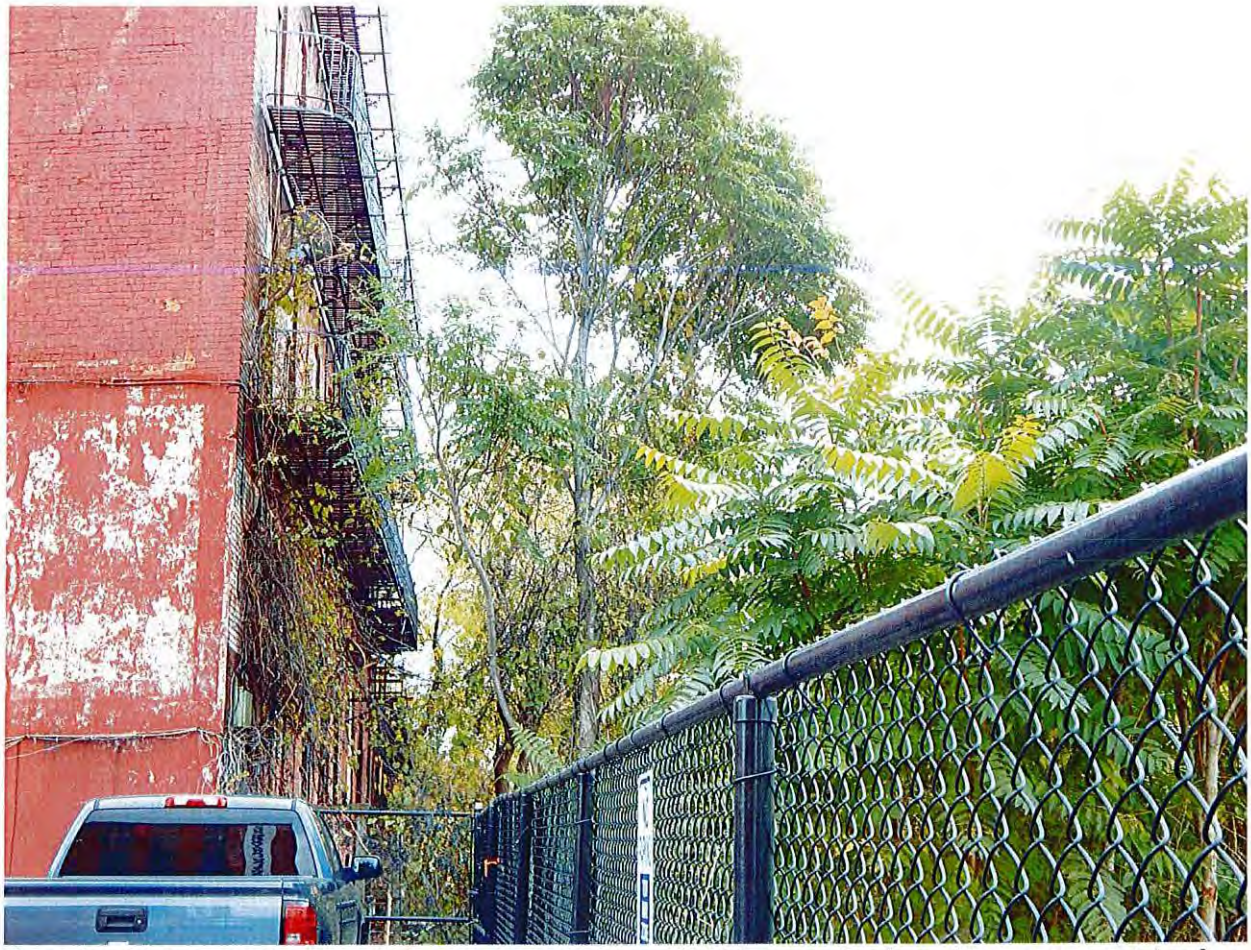


Photo 4: 514 Oswego Boulevard. The property address of 514 Oswego Boulevard is a remnant strip of land formed with the original construction of I-81. The property associated with 514 Oswego Boulevard is the forested area on the outside of the fence. The current I-81 viaduct lies just beyond the wooded area.



Photo 5: 484 North Salina Street



Photo 6: 130-44 West Onondaga Street



Photo 7: 484-98 South Salina Street



Photo 8: 100 East Water Street



Photo 9: 257 East Water Street

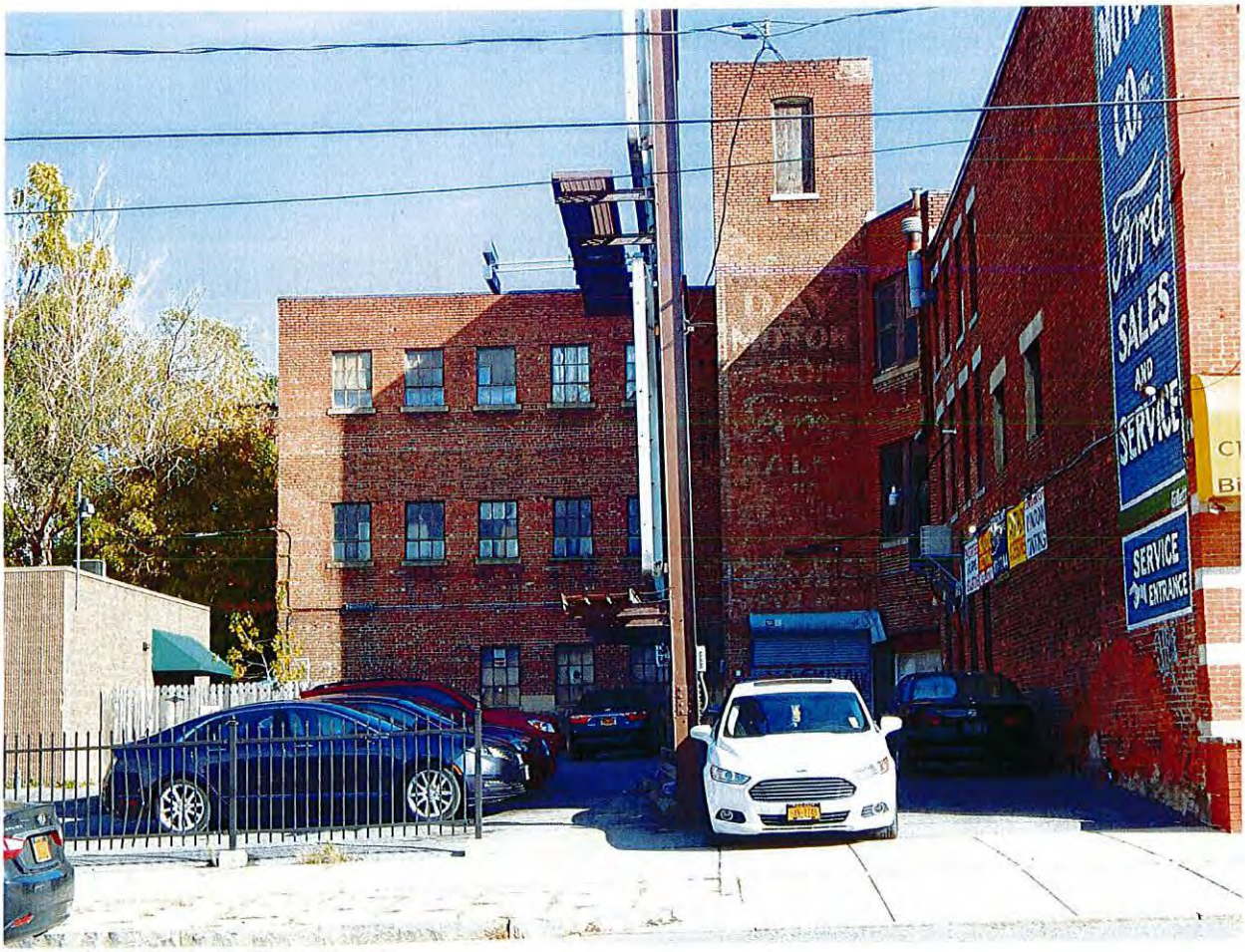


Photo 10: 606 North State Street

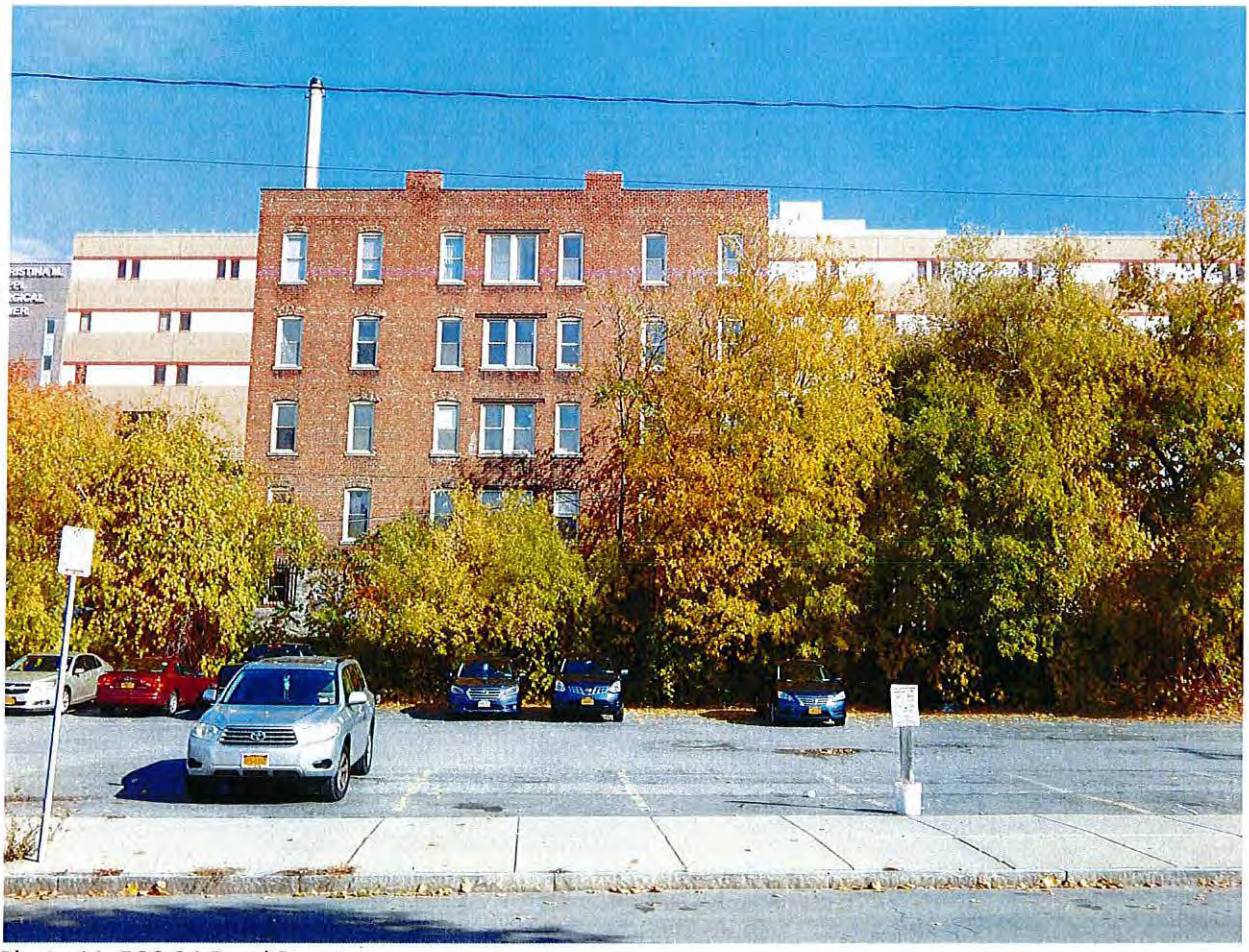


Photo 11: 506-24 Pearl Street



Photo 12: 557 North Salina Street



Photo 13: 601 North Salina Street



Photo 14: 438 – 446 North Franklin Street

Interstate 81- Viaduct Project
PIN 3501.60
SHPO # 16PR006314
Continuing Consultation For Historic Properties

Attachment 2: Updated Building Eligibility Assessment Table

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	RIDGECRESTDR	North			X			Not NRE
Cicero	6108	RIDGECRESTDR	North			X			Not NRE
Cicero	6153	SMITH RD	North			X			Not NRE
Cicero	6179	SMITH RD	North				X		Not NRE

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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	TULLERRD	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

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North Syracuse	156	SLINDES WOODS CIR	North			X			Not NRE
North Syracuse	158	SLINDES WOODS CIR	North			X			Not NRE
Syracuse		Pioneer Homes	Viaduct	Not Eligible (06740.014017)	Pioneer Homes: not National Register-eligible because of loss of integrity. Many address locations including the following: 1001 ALMOND ST & MONROE ST & R, 901-1055 MCBRIDE ST S & ADAMS STE, 1101 MCBRIDE ST S & JACKSON ST, 1031-59 TOWNSEND ST S & ADAMS ST		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 (06740.003975)					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	145	ARSENAL DR REAR/ Onondaga Hollow Burial Ground, House Family Cemetery	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 (06740.008262)					Not NRE
Syracuse	216	BASIN ST	Viaduct	Not Eligible (06740.004809)					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

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
Syracuse	204	BEECH ST N	Viaduct	Not Eligible (06740.013773)					Not NRE
Syracuse	207	BEECH ST N	Viaduct	Not Eligible (06740.013832)					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	804	BELDENAVEW	Viaduct				X		NRE
Syracuse	806	BELDEN AVE W	Viaduct	Not Eligible (06740.008645)					Not NRE
Syracuse	808	BELDEN AVE W	Viaduct	Not Eligible (06740.013605)					Not NRE
Syracuse	629-31	BELDENAVEW	Viaduct				X		Not NRE
Syracuse	701-09	BELDENAVEW	Viaduct				X		Not NRE
Syracuse	814-16	BELDENAVEW	Viaduct			X			Not NRE
Syracuse	820-26	BELDENAVEW	Viaduct			X			Not NRE
Syracuse	802	BELDEN AVE W & LEAVENWORT	Viaduct	Not Eligible (06740.010012)					Not NRE
Syracuse	706-08	BELDEN AVE W & LEAVENWORT	Viaduct				X		Not NRE
Syracuse	702-04	BELDEN AVE W & MALTBIE ST	Viaduct				X		Not NRE
Syracuse	600	BRIGHTON AVE E	South				X		Not NRE
Syracuse	821	BRIGHTON AVE E	South	Not Eligible (06740.00467)					Not NRE
Syracuse	890	BRIGHTON AVE E	South			X			Not NRE
Syracuse	125	BURNET AVE	Viaduct	Not Eligible (06740.000256)					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

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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 (06740.0072)					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 (06740.006103)					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 (06740.010808)					Not NRE
Syracuse	605	BURNET AVE	Viaduct				X		Not NRE
Syracuse	606	BURNET AVE	Viaduct	Not Eligible (06740.005458)					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

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
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 (06740.013829)					Not NRE
Syracuse	323	BURNET AVE & CATHERINE ST	Viaduct				X		Not NRE
Syracuse	322-24	BURNET AVE & CATHERINE ST	Viaduct				X		Not NRE
Syracuse	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-Folker House/Caldwell &Ward Brass Co Office/"Cab Fab"	Viaduct	NR-Eligible (06740.000261)	The Cabinet Fabrication Group property located at CabFab" 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

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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 Residence	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 19th and early 20th 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/Turack Motor Service	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 ItalianateNeo Grec-style middle-class domestic architecture (Letter ID C).			X	NRE
Syracuse	112-16	BURNET AVE/ Michael Dolphin Building/ Barboni Building	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 (06740.004479)					Not NRE
Syracuse	507	BURT ST TO MCBRIDE ST S	Viaduct				X		Not NRE
Syracuse	512	BURT ST TO VANBUREN ST	Viaduct	Not Eligible (06740.003044)					Not NRE
Syracuse	204	BUTTERNUT ST	Viaduct	NR-eligible (Non-contributing within the North Salina Street Historic District 2016 Expansion)				NRE N/C	NRE N/C
Syracuse	206	BUTTERNUT ST	Viaduct	Not Eligible (06740.008643)					Not NRE

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Syracuse	117	BUTTERNUT ST & SALT ST/ Veterans Fastener Supply Co	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 (06740.006107)					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 (06740.011671)					Not NRE
Syracuse	221-23	CLINTON ST N	Viaduct	Not Eligible (06740.010502)					Not NRE
Syracuse	901	CLINTON ST N & COURT ST W	Viaduct	Not Eligible (06740.003729)					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 and Courthouse	Viaduct	**NR-listed (91NR00249)**	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)					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/ Former Butler Mfg. Co Building	Viaduct	06740.001456 (previously NRE, now demolished)					Demolished

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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 Building	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 & Associates)	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 (06740.00309)					Not NRE
Syracuse	940	COMSTOCK AVE & COLVIN ST/ Oakwood Cemetery	Viaduct	**NR-Listed (90NR03310)**	The Oakwood Cemetery (1859-1 940) 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 (06740.000859)					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

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Syracuse	701-05	CROUSE AVE S & ADAMS ST E	Viaduct				X		Not NRE
Syracuse	601-15	CROUSE AVE S & HARRISON S/601 South Crouse Ave	Viaduct	NR-eligible (06740.004699)	The former Temple Adath Yeshurun is eligible under Criterion Cas 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 (06740.004140)					Not NRE
Syracuse	102	DIVISION ST W & CLINTON S/ Oak Knitting Co. Mill	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 Cas 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 Restaurant	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 Cas 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	1215-25	ERIE BLVD E TO CANAL ST	Viaduct				X		Not NRE
Syracuse	911	ERIE BLVD ETOCANAL ST&	Viaduct				X		Not NRE
Syracuse	1231	ERIE BLVD E TO LODI ST &	Viaduct			X			Not NRE

Page 39 of 220

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
Syracuse	740	ERIE BLVD E TO WATER ST E/ Terminal Building Warehouse (U Haul Warehouse)	Viaduct	NR-eligible (06740.011626)	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 (1 930-1941) and is significant under Criteria A and C. (Building 13)			NRE	NRE
Syracuse	815	ERIE BLVD E/400 Burnet Blvd/711-21 Erie Blvd New York Central Railroad Passenger and Freight Station	Viaduct	**NR-listed (90NR00743)**	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 or 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 (06740.000625)					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 STE & ALMOND ST	Viaduct				X		Not NRE

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Syracuse	1001	FAYETTE STE & CROUSE AVE	Viaduct				X		Not NRE
Syracuse	938	Fayette Street E & Crouse Ave/ The Sylvester	Viaduct	NR-eligible (06740.013452)	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 Episcopal Zion Church	Viaduct	**NR-listed (11 NR06227)**	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 (06740.013403) 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	FORMANAVEREAR	Viaduct				X		Not NRE
Syracuse	212	FRANKLIN ST N	Viaduct	Not Eligible (06740.001215)					Not NRE
Syracuse	214	FRANKLINSTN	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 St	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. Demolished			Demolished	
Syracuse	501	FRANKLIN ST N & PLUM ST	Viaduct				X		Not NRE

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Syracuse	455	FRANKLIN ST N & PLUM ST/ Regal Textile Plant	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 Plant	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 Typewriter Company Building/New Process Gear Plant #3	Viaduct	NR-eligible (06740.001213)	The Remington (Monarch) Typewriter Company ant #3 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 (06740.011172)					Not NRE
Syracuse	205	GARFIELDAVE	Viaduct				X		Not NRE
Syracuse	221	GARFIELD AVE	Viaduct	Not eligible (06740.010720)					Not NRE
Syracuse	207-09	GARFIELD AVE	Viaduct	Not eligible (06740.011597)					Not NRE
Syracuse	211-17	GARFIELD AVE	Viaduct	Not eligible (06740.003770)					Not NRE
Syracuse	131	GARFIELDAVE&WOODLAND	Viaduct				X		Not NRE
Syracuse	201	GARFIELD AVE & WOODLAND A	Viaduct	Not eligible (06740.004411)					Not NRE
Syracuse	215	GENANT DR	Viaduct				X		Not NRE
Syracuse	647	GENANT DR & CLINTON ST N	Viaduct				X		Not NRE
Syracuse	651	GENANTDR&CLINTONSTN	Viaduct			X			Not NRE
Syracuse	431	GENANT DR & DIVISION ST W	Viaduct			X			Not NRE
Syracuse	311	GENANT DR TO CLINTON ST N/ Syracuse Lighting Co. Plant	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	120/118	GENESEE ST E/Bank of Syracuse, Yackel and Rupp Insurance.	Viaduct	**NR-listed (within the Hanover Square Historic District)**				NRL	NRL
Syracuse	225	GENESEE ST E	Viaduct	**NR-listed (Non-Contributing within the Hanover Square Historic District 2014 Expansion)**				NRL N/C	NRL N/C

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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 (06740.004120)					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 STE & CROUSE AVE	Viaduct	Not Eligible (06740.012948)					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 (06740.008658)					Not NRE
Syracuse	827-33	GENESEE ST E & IRVING AVE	Viaduct	Not Eligible (06740.012550)					Not NRE
Syracuse	901-05	GENESEE ST E & IRVING AVE	Viaduct				X		Not NRE
Syracuse	571-81	GENESEE ST E & MCBRIDE S	Viaduct	Not Eligible (06740.006166)					Not NRE

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Syracuse	601	GENESEE ST E & MCBRIDE ST/ Peck Hall/Reid Hall	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	800-14	GENESEE ST E TO CEDAR ST	Viaduct	Not Eligible (06740.012381)					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 (06740.005263)					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 Casket Co.	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	**NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion)**	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	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	132	GENESEE ST E/ Franklin Building	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	122-26	GENESEE ST E/ Franklin Building	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL

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Syracuse	134-36	GENESEE ST E/ Franklin Building (134) Post-Standard Building (136)	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	200	GENESEE ST E/ Granger Block	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District) (06740.013179)**				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 (06740.004555)					Not NRE
Syracuse	400	GENESEE ST W & WALLACE ST/ Engine Company 12	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 Presbyterian Church and Belden House	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

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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 IDM).			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 Irving School	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 Herald Building	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		Vacant Parcel				
Syracuse	204	HOWARD ST	Viaduct				X		Not NRE
Syracuse	445	IRVING AVE	Viaduct	Not Eligible (06740.013669)					Not NRE
Syracuse	505	IRVING AVE	Viaduct			X			Not NRE
Syracuse	722-48	IRVING AVE	Viaduct	Not Eligible (06740.007113)					Not NRE
Syracuse	701	IRVING AVE & ADAMS ST E	Viaduct			X			Not NRE

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Syracuse	601	IRVING AVE & HARRISON ST	Viaduct			X			Not NRE
Syracuse	800	IRVING AVE & VANBUREN ST	Viaduct	Not Eligible (06740.007221)					Not NRE
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 (06740.001298)					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 Hotel/Apartments	Viaduct	NR-eligible (06740.000251)	The Snowdon 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

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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 IDO).			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-19th 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 (06740.006364)					Not NRE
Syracuse	280	LEON ST	Viaduct	Not Eligible (06740.004040)					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 (06740.008089)					Not NRE
Syracuse	268-70	LEON ST	Viaduct				X		Not NRE
Syracuse	274-76	LEON ST	Viaduct				X		Not NRE

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
Syracuse	105	LOCK ALLEY	Viaduct				X		Not NRE
Syracuse	125	LOCK ALLEY	Viaduct	Not Eligible (06740.010641)					Not NRE
Syracuse	127	LOCK ALLEY	Viaduct	Not Eligible (06740.003562)					Not NRE
Syracuse	101	LODI ST & CANAL ST	Viaduct				X		Not NRE
Syracuse	125	LYNN CIR	South	Not Eligible (06740.011844)					Not NRE
Syracuse	129	LYNNCIR	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 (06740.007431)					Not NRE
Syracuse	1427	MCBRIDE ST S	Viaduct	Not Eligible (06740.001483)					Not NRE
Syracuse	1429	MCBRIDE ST S	Viaduct	Not Eligible (06740.002251)					Not NRE
Syracuse	1435	MCBRIDE ST S & RAYNOR AVE	Viaduct	Not Eligible (06740.003507)					Not NRE
Syracuse	1423	MCBRIDE ST S & SIZER ST	Viaduct	Not Eligible (6740.007432)					Not NRE
Syracuse	1419-21	MCBRIDE ST S & SIZERST	Viaduct	Not Eligible (06740.007433)					Not NRE
Syracuse	110	MCBRIDESTSREAR	Viaduct				X		Not NRE
Syracuse	201	MENLO DR	South	Not Eligible (06740.002994) (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 (06740.006546)					Not NRE
Syracuse	142	OAKLAND ST	Viaduct				X		Not NRE
Syracuse	143	OAKLAND ST & STADIUM PL	Viaduct				X		Not NRE
Syracuse	515	OAKWOODAVE	Viaduct				X		Not NRE
Syracuse	637-39	OAKWOOD AVE	Viaduct	Not Eligible (06740.008390)					Not NRE
Syracuse	100-08	ONONDAGA ST E	Viaduct				X		Not NRE

Page 14 of 20

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
Syracuse	111-13	ONONDAGA STE	Viaduct			X			Not NRE
Syracuse	130-44	ONONDAGA ST W	Viaduct		Parking lot				
Syracuse	514	OSWEGO BLVD	Viaduct		Vacant parcel				
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 Structures	Viaduct	NR-eligible (06740.001340)	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 (06740.010644)					Not NRE
Syracuse	113	PARK AVE	Viaduct	Not Eligible (06740.004133)					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	402-406	PEARL ST/includes 400 Pearl St	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion). 400 Pearl St. is a non-contributing addition to 402-406 Pearl St.				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	422-42	PEARL ST/200-04 BELDEN AVE	Viaduct	NR-eligible (within the North Salina Street HD 2016 Expansion)				NRE	NRE
Syracuse	320-24	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE

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
Syracuse	502-04 500; 504 (rear)	PEARL ST	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	506-24	PEARL ST	Viaduct		Vacant/parking lot				
Syracuse	124	PLUM ST	Viaduct	Not Eligible (06740.002323)					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/St. Joseph's Hospital Nurse's Home	Viaduct	NR-eligible (06740.001331)	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-eligible (Non Contributing to the North Salina Street Historic District 1999 Expansion)				NRE N/C	NRE N/C
Syracuse	344	SALINA ST N	Viaduct	NR-eligible (Non Contributing to the North Salina Street Historic District 1999 Expansion)				NRE N/C	NRE N/C
Syracuse	429	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	435	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE

Page 51 of 222

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
Syracuse	437	SALINA ST N	Viaduct	NR eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	443	SALINA ST N	Viaduct	NR-eligiblw (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	447	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	449	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	466	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	478	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	484	SALINA ST N	Viaduct		Parking lot				
Syracuse	488	SALINA ST N	Viaduct	NR-eligible (Non Contributing within the North Salina Street Historic District 2016 Expansion)				NRE N/C	NRE N/C
Syracuse	500	SALINA ST N	Viaduct	NR-eligibleWNon-contributing within the North Salina Street Historic District 2016 Expansion				NRE N/C	NRE N/C
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	549/547	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

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
Syracuse	557	SALINA ST N	Viaduct	**NR-listed (Contributing to the North Salina Street Historic District)**	Demolished			demolished	
Syracuse	601	SALINA ST N	Viaduct	**NR-listed (Contributing to the North Salina Street Historic District)**	Demolished			demolished	
Syracuse	613	SALINA ST N	Viaduct	**NR-listed (Contributing to the North Salina Street Historic District)**				NRL	NRL
Syracuse	619	SALINASTN	Viaduct	**NR-listed(Non-contributing to the North Salina Street Historic District)**				NRL N/C	NRL N/C
Syracuse	649	SALINA ST N	Viaduct			X			Not NRE
Syracuse	101-239	SALINA ST N	Viaduct			X			Not NRE
Syracuse	401 Aka 329	SALINA ST N/329 Salina St N/ Learbury Centre	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	409-11	SALINA ST N	Viaduct	NR-eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	413-15	SALINA ST N	Viaduct	NR eligible Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	417-19	SALINA ST N	Viaduct	NR eligiblie (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	423-25	SALINA ST N	Viaduct	NR eligible (Non Contributing to the North Salina Street Historic District 1999 Expansion)				NRE N/C	NRE N/C
Syracuse	472-74	SALINA ST N	Viaduct	NR eligible (Contributing to the North Salina Street Historic District 1999 Expansion)				NRE	NRE
Syracuse	501-05	SALINA ST N	Viaduct	NR-eligible (Non-contributing within the North Salina Street Historic District 2016 Expansion.				NRE N/C	NRE N/C
Syracuse	507-13	SALINA ST N	Viaduct	NR-eligibleWithin the North Salina Street Historic District 2016 Expansion (06740.012783)				NRE	NRE
Syracuse	522-24	SALINA ST N	Viaduct	**NR listed (Contributing to the North Salina Street Historic District)**				NRL	NRL

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
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 Chest Building (Third National Bank)	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 byArchimedes Russell. (Building 35)			NRL	NRL
Syracuse	100	SALINA ST N & JAMES ST/ 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 Building	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

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
Syracuse	315-25	SALINA ST N/ 315 North Salina Street	Viaduct	NR-eligible (within the North Salina Street Historic District 1999 Expansion) (06740.001732)				NRE	NRE
Syracuse	114-18	SALINAST N/ One Clinton Square Commercial Building	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	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		Parking lot				
Syracuse	501-23	SALINA ST S	Viaduct			X			Not NRE
Syracuse	500-50	SALINA ST S/ Chimes Building	Viaduct	**NR listed (Contributing to the South Salina Street Downtown Historic District 2014 Expansion)**				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 (06740.010559)					Not NRE
Syracuse	362-72	SENECA TNPK E	South	Not Eligible (06740.013397)					Not NRE
Syracuse	382	SENECA TNPK E/ Hous e	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	SLINDESWOODS CIR				X			Not NRE
Syracuse	142	SLINDES WOODS CIR				X			Not NRE
Syracuse	144	SLINDES WOODS CIR				X			Not NRE

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
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	106	MONTGOMERY ST/ Engine House #1	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740.000646)**				NRL	NRL
Syracuse	413	STATE ST N	Viaduct	Not Eligible (06740.002423)					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 (06740.010674)					Not NRE
Syracuse	509	STATE ST N	Viaduct				X		NRE
Syracuse	515	STATE ST N	Viaduct	Not Eligible (06740.006889)					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		Vacant parcel				
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 (06740.002721)					Not NRE
Syracuse	1108	STATE ST N	Viaduct	Not Eligible (06740.002276)					Not NRE
Syracuse	1112	STATE ST N	Viaduct	Not Eligible (06740.006053)					Not NRE
Syracuse	1114	STATE ST N	Viaduct	Not Eligible (06740.012531)					Not NRE

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
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	409-11	STATE ST N	Viaduct	Not Eligible (06740.002421)					Not 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 & BASINST	Viaduct				X		Not NRE
Syracuse	501	STATE ST N & BELDEN AVE E	Viaduct				X		Not NRE

Page 5 of 20

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
Syracuse	429	STATE ST N & BELDEN AVE E/ A Angeloro Commercial Building	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				X		Not NRE
Syracuse	1100	STATE ST N & CATAWBA ST	Viaduct				X		Not NRE
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 (06740.010678)					Not NRE
Syracuse	1130	STATESTN&ISABELLAST	Viaduct				X		Not NRE
Syracuse	214	STATE ST N & WILLOW ST E/ Saint John the Evangelist Rectory	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 Evangelist Church	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 (06740.002546)					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 Foods	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 20th century grocery warehouse associated with a major Syracuse-based grocery distributor (Letter ID Y).			X	NRE

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
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 (06740.003233)	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 (06740.012115)					Not NRE
Syracuse	817-35	STATE ST S & ADAMS STE	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 ST N	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 (06740.013481)					Not NRE
Syracuse	115	SUNRISE DR REAR	South				X		Not NRE
Syracuse	208	SUNSET AVE	Viaduct	Not Eligible (06740.011236)					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 (06740.013166)					Not NRE
Syracuse	310	SUNSET AVE	Viaduct				X		Not NRE
Syracuse	312	SUNSET AVE	Viaduct	Not Eligible (06740.006268)					Not NRE
Syracuse	316	SUNSET AVE	Viaduct				X		Not NRE

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
Syracuse	318	SUNSET AVE	Viaduct	Not Eligible (06740.009042)					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 (06740.013311)					Not NRE
Syracuse	406-14	SUNSET AVE	Viaduct	Not Eligible (06740.007548)					Not NRE
Syracuse	111-13	SUNSET AVE & BASIN ST	Viaduct				X		Not NRE
Syracuse	424	SUNSET AVE & BEAR ST	Viaduct	Not Eligible (06740.004058)					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 (06740.004059)					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 (06740.000369)					Not NRE
Syracuse	117	TOWNSEND ST N & BROWN ST	Viaduct				X		Not NRE
Syracuse	201	TOWNSEND ST N & BURNET AV/ Benjamin Redmen House	Viaduct	Not Eligible (06740.000255)					Not NRE
Syracuse	202	TOWNSEND ST N & BURNET AV/ Samuel Stapely House	Viaduct	NR-eligible (06740.000368)	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 (06740.00037)	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 (06740.000253)					Not NRE
Syracuse	205	TOWNSEND ST N/ Wolverine Apartments	Viaduct	NR-eligible (06740.000254)	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)			NRE	NRE
Syracuse	115	TOWNSEND ST S	Viaduct				X		Not NRE
Syracuse	507-17	TOWNSEND ST S	Viaduct			X			Not NRE

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
Syracuse	301	TOWNSEND ST S & FAYETTE S/ Park Central Presbyterian Church/ Parish House	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 White House	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	205	TOWNSEND ST S/ 205 South Townsend St	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	105-109	TOWNSEND ST S/aka 500 Water St E/ Phoenix Foundry & Machine Co.	Viaduct	NR-eligible (06740.011635)	105-109 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 19th and early 20th centuries and as an intact example of late 19th century industrial architecture. (Building 49)			NRE	NRE
Syracuse	110-12	TOWNSEND ST S & 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	109	WARREN STREET S/201-19 Genesee St E/State Tower Building	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	114	WARREN STREET S/140 East Genesee Street/ Larned Building	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	126-34	WARREN ST N	Viaduct				X		Not NRE
Syracuse	601-77	WARREN ST S & ADAMS STE	Viaduct	Not Eligible (06740.013668)					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 STE	Viaduct				X		Not NRE
Syracuse	301	WASHINGTON ST E & MARKET/ Sen. Hughes NYS Office Building	Viaduct				X		Not NRE

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
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				X		Not NRE
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	**NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (90NR021 09)**	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		Open Space				
Syracuse	250	WATER ST E	Viaduct	**NR-listed (Contributes to Hanover Square Historic District 2014 Expansion)**				NRL	NRL
Syracuse	257	WATER ST E	Viaduct		Open space				
Syracuse	301	WATER ST E & ERIE BLVD E/ Weighlock Building	Viaduct	**NR-listed (Individually) and NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (90NR02097)**	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	323	WATER ST E/330 Erie Blvd E/ Strempel's Locksmiths	Viaduct	**NR-listed (contributes to the Hanover Square Historic District) (06740. 000632)**				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 STE & 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	215	WATER ST E TO ERIE BLVD E/ Former 4 story J&J Crouse Building	Viaduct	**NR-listed (Non-contributing to the Hanover Square Historic District 2014 Expansion) (06740.013092)**				NRL N/C	NRL N/C

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
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 Aka 253	WATER ST E/ 251 East Water Street	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 013177)				NRL	NRL
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 2014 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 2014 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	235/237	WATER ST E/ Commercial Building	Viaduct	NR-listed (Contributing to the Hanover Square Historic District 2014 Expansion) (06740. 001449)				NRL	NRL
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/(101 Salina Street South/Onondaga County Savings Bank	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

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
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)Phoenix Building (129)	Viaduct	**NR-listed (Contributing to the Hanover Square Historic District)**				NRL	NRL
Syracuse	324	WATER ST W TO ERIE BLVD W	Viaduct	Not Eligible (06740.013738)					Not NRE
Syracuse	376	WATER ST W TO ERIE BLVD W/ Commercial	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 STE	Viaduct				X		Not NRE
Syracuse	123-29	WILLOW ST E/ Howard & Jennings Pump Factory	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	313	WILLOW ST E/301-19 State Street N	Viaduct	NR-eligible (within the North Salina Street Historic District 2016 Expansion)				NRE	NRE
Syracuse	234-48	WILLOW ST W & FRANKLIN ST	Viaduct				X		Not NRE
Syracuse	230	WILLOW ST W/ C.W. Snow & Company Warehouse	Viaduct	**NR-listed (06NR05624)**	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 byArchimedes Russell. (Building 58)			NRL	NRL

NEW YORK STATE OF OPPORTUNITY. 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 IA 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 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

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.

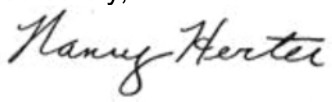
- It is noted in Section 3.1.2 that testing is for the purpose of identifying significant archaeological sites in previously disturbed areas. Please elaborate on why testing is necessary in disturbed areas.

- 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.

Sincerely,



Nancy Herter
Archaeology Unit Program Coordinator
e-mail: nancy.herter@parks.ny.gov

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 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

50 Wolf Road, Albany, NY 12232 | www.dot.ny.gov

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 or 518-417-6642.

Sincerely,

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)

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

Nancy Herter
Archaeology Unity Program Coordinator
e-mail: 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 or (518) 417-6642.

Sincerely,

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 or (518) 417-6642.

Sincerely,

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

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 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,

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.

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

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

Nancy Herter
Archaeology Unit Program Coordinator
e-mail: nancy.herter@parks.ny.gov

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

November 7, 2017

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 1B Archaeological Survey Report* is currently in progress, and the report will be provided for your review and comment when it is complete.

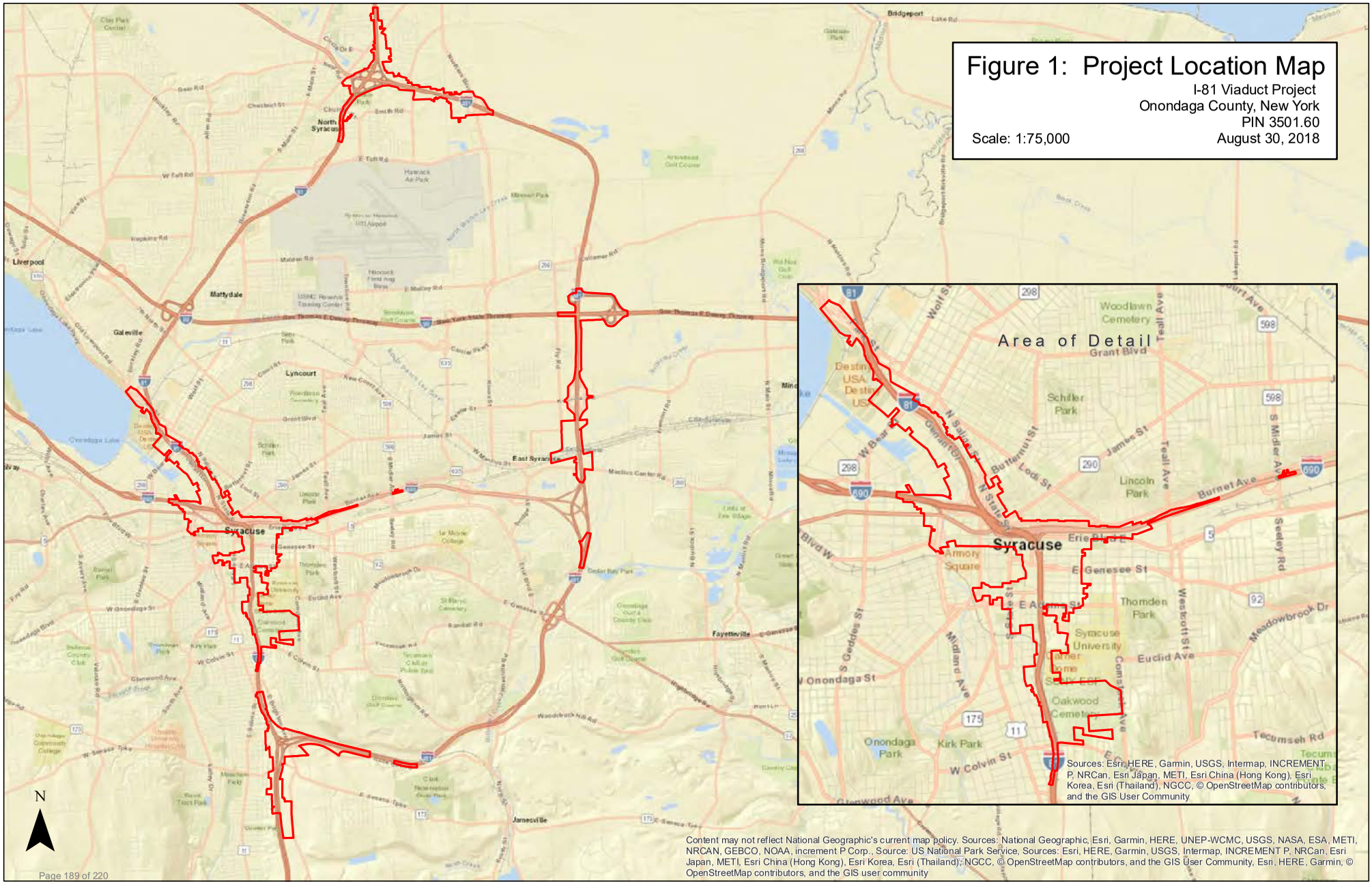
On behalf of the FHWA and NYSDOT, we look forward to your participation in Section 106 consultation for the I-81 Viaduct Project. If you have any questions or would like to discuss the Project, please contact me at (518) 431-8880.

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


Figure 1: Project Location Map
I-81 Viaduct Project
Onondaga County, New York
PIN 3501.60
Scale: 1:75,000
August 30, 2018
Area of Detail
Syracuse
East Syracuse
Lyncourt
Liverpool
Mattydale
Galeville
Fayetteville
Jamesville
N
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community
Content may not reflect National Geographic's current map policy. Sources: National Geographic, Esri, Garmin, HERE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, increment P Corp., Source: US National Park Service, Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

NEW YORK STATE OF OPPORTUNITY. 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.

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>
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 1-81 corridor of the City of Syracuse, an area that centers on but is not restricted to the city's old 15th 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 1-95 (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
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.

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 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

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

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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315-475-2465

March 17, 2020

Daniel Hitt
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. Hitt:

In a November 8, 2019 letter, the Onondaga Nation made several requests related to the cultural resource investigation and monitoring for the I-81 project. Specifically, the Nation raised concerns about the archaeological sensitivity determinations within the project area and asked that the Nation be directly involved in monitoring active construction areas and/or training construction workers and on-site supervisors to monitor active construction sites on their own. Your response was that the New York State Department of Transportation would take the request under advisement. Since no decision has been made, we are taking this opportunity to supplement the request for cultural monitors and/or worker training.

As indicated in our earlier letter, the Nation requests that a Cultural Resource Monitor (CRM) chosen or approved by the Nation be present at all active construction locations and that, to the extent possible, a supervising archaeologist chosen or approved by the Nation be available to consult with those monitors and to respond to any inadvertent discoveries of cultural resources or human remains during the I-81 construction period. Because this will provide value to a project being undertaken in a sensitive area, the cost of CRMs and an archaeologist, if needed, should be borne by the project applicant and incorporated into the project budget.

CRMs are certainly warranted whenever construction will occur in areas designated as sensitive, but the Nation firmly believes that such monitors are also valuable in "non-sensitive" or previously disturbed areas for this project. In our experience, any ground disturbing activities within the traditional Onondaga territory have the potential to disturb cultural artifacts or burial sites. Within the past 18 months alone, human remains were discovered at two sites undergoing

construction that were designated non-sensitive. In both cases, the remains were fairly obvious and difficult to overlook. That may not be the case for the I-81 project.

The Nation's concern about potential disruption of cultural artifacts from the I-81 project stems from two primary issues. First, the areas around Onondaga Lake and the original configuration of Onondaga Creek were central to the Onondaga Nation from time immemorial. Over time, many villages, fishing and hunting camps, and primary travel routes would have been established in this area and cultural artifacts and burial sites associated with those uses are extremely likely to have been present. Second, as documented in your own archaeological surveys, 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. Further, these cultural artifacts may have been scattered during this process, meaning that they may be in smaller bits or isolated and therefore easily overlooked or not recognized as cultural artifacts by untrained workers.

Dedicated CRMs will be more likely to observe and properly identify scattered or isolated artifacts both because they will be focused exclusively on this task and will have the necessary experience and/or training to recognize a range of CRMs employed on active construction sites have extensive training – at minimum, a bachelor's degree in a relevant subject and specialized field training – or many years of experience. The typical construction worker on the I-81 project would not meet those standards. The Nation can provide CRMs that do.

Anthony Gonyea, for example, has almost 25 years of field experience. In addition to his extensive familiarity with cultural artifacts and human remains as they present in the field, he has learned to recognize indicators of potentially sensitive areas, such as soil striations associated with potential burial sites and soil coloration that may indicate campfires associated with hunting or fishing villages. Tiffany Lee, a Nation citizen, will soon finish a doctorate in archaeology with specialized training in the identification and excavation of human remains. Additionally, she has previous experience as a CRM for construction sites. Several Nation citizens who could be tapped as monitors hold bachelor's degrees in archaeology, anthropology, museum studies, or related subjects. Coupled with their grounded knowledge of Onondaga culture, these Nation citizens are uniquely qualified to identify cultural artifacts within the construction areas.

Dedicated CRMs would be tasked with the following: observing open construction areas for cultural artifacts, human remains, or "sensitive area" indicators; examining questionable items uncovered by construction to determine if they constitute artifacts or remains; and, in consultation with the Nation-chosen archaeologist, supervising the excavation or appropriate handling of any artifacts or remains uncovered during construction. Based on rates on other projects, acceptable hourly rates for Nation CRMs would range from approximately $18 to $52 per hour depending on training and experience and travel expenses based on standard mileage rates, as needed. A detailed proposal for the positions, qualifications, salary requirements, and associated tasks for Nation staff sis included with this letter as Attachment 1.

For the I-81 project specifically, the Nation would propose using staff at the Junior-Level Archaeologist/CRM II, Senior-Level Archaeologist/Senior CRM, and Lead Archaeologist/CRM Coordinator level. Tony Gonyea, whose extensive field experience qualifies him as a Senior CRM, would focus on the most sensitive sites and be compensated at an hourly rate of $40.40. Due to the higher probability of finding human remains, Tiffany Lee would monitor project areas considered most sensitive and be compensated at an hourly rate of $52.50. At least three additional Nation citizens, based on undergraduate training and direct experience, qualify for CRM II positions. They would focus on areas expected to be less sensitive or work with Mr. Gonyea to monitor particularly large sites with more than one area of active ground disturbance. Their pay rate would be $23.23 per hour.

For all the reasons above, the Nation strongly prefers having its own paid monitors at open construction sites given their greater cultural competence. However, if there are many areas under construction at the same time, Nation monitors may not be available for all sites. For that reason, training of construction workers by Nation-designated or approved staff should also be required to ensure that project staff working on unmonitored sites recognize artifacts and know the appropriate procedure. 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.

Based on their years of experience, advanced training, and cultural knowledge, Onondaga Nation representatives such as Tony Gonyea and Tiffany Lee are best qualified to conduct this training. As with the monitoring services, trainers provided by the Nation are providing a benefit to the project and should be compensated using project funds. Hourly rates for trainers would range from $50 to $75, since trainers must have both the extensive training and/or field experience required for senior field staff and the additional skills necessary to design and deliver classroom and field instruction on the identification and proper handling of cultural resources.

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

Attachment 1: Archaeology Consultant/Cultural Resource Monitor
Position Descriptions and Salary Requirements
Onondaga Nation Historic Preservation Office

Lead Archaeologist/Cultural Resource Monitor Coordinator (Ex: Tiffany Lee - Senior Bioarchaeologist)

Experience/Training: Terminal degree (PhD) in relevant field; significant field experience

Salary Requirements: starting at $52.52/hour ($109,240 annually) plus per diem as needed

Tasks:

- Act as Onondaga Nation Lead Archaeological Consultant
- Review archaeological site survey reports to assess site sensitivity
- Serve as Human Remains Specialist: identification, excavation, repatriation
- Identify faunal remains
- Serve as Site Construction Consultant on excavation methods
- Act as Site Supervisor for projects with multiple Cultural Resource Monitors
- Assess cultural materials discovered on site
- Monitor construction at sensitive sites or sites with probable effects on cultural deposits
- Complete monitoring forms as needed: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Act as Lead Field Trainer for Cultural Resource Monitor I and II
- Catalog cultural materials

Senior-level Archaeologist/Senior Cultural Resource Monitor (Ex: Tony Gonyea - Regional Cultural Specialist)

Experience/Training: M.A./M.S. in relevant field **OR** 10+ years' field experience

Salary Requirements: starting at $40.40/hour ($84,040 annually) plus per diem as needed

Tasks:

- Act as Section 106 and NAGPRA Nation Representative
- Conduct site sensitivity assessment
- Serve as Site Construction Consultant on excavation methods
- Act as Site Supervisor for projects with multiple Cultural Resource Monitors
- Assess cultural materials discovered on site
- Monitor construction at sensitive sites or sites with probable effects on cultural deposits
- Complete monitoring forms as needed: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Identify archaeological features and cultural materials
- Act as Lead Field Trainer for Cultural Resource Monitor I and II
- Report to Lead Archaeologist upon inadvertent discovery of human remains

Mid-Level Archaeologist/Cultural Resource Monitor III

Experience/Training: B.A./B.S. in relevant field; 5+ years' experience

Salary Requirements: starting at 30.22/hour ($62,860 annually) plus per diem as needed

Tasks:

- Report to Regional Cultural Specialist or Lead Archaeologist
- Act as Site Supervisor
- Monitor construction on sites with potential effects on cultural deposits
- Complete monitoring forms: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Identify archaeological features and cultural materials
- Report to Lead Archaeologist upon inadvertent discovery of human remains

Junior-Level Archaeologist/Cultural Resource Monitor II

Experience/Training: B.A./B.S. in relevant field; limited experience

Salary requirements: starting at $23.14/hour ($48,130 annually) plus per diem as needed

Tasks:

- Report to Site Supervisor
- Monitor construction on sites with potential effects on cultural deposits
- Complete monitoring forms: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Identify archaeological features and cultural material
- Engage in ongoing field training
- Report to Lead Archaeologist upon inadvertent discovery of human remains

Entry Level Archaeologist/Cultural Resource Monitor I

Experience/Training: B.A./B.S. in relevant field; no experience

Salary Requirements: starting at $18.25/hour ($37,970 annually) plus per diem as needed

Tasks:

- Report to and assist senior cultural monitor on-site (Cultural Resource Monitor II or III; Senior Cultural Resource Monitor; or Cultural Resource Monitor Coordinator)
- Engage in on-going field training
- Monitor construction sites considered "Low probability of cultural effects"
- Complete monitoring forms: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Report to Lead Archaeologist inadvertent discovery of human remains

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 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.)

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 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.)

NEW YORK STATE OF OPPORTUNITY. 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 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.

50 Wolf Road, Albany, NY 12232 | www.dot.ny.gov

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.)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

September 25, 2020

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

RE: ***Section 106 Consultation: Additional copies of Phase IB Work Plan***
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 to the Onondaga Nation, per your request in March 2020, four hard copies of the *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery*, 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). A hard copy and electronic copies of this document were initially transmitted to the Onondaga Nation on October 10, 2017. An electronic copy was transmitted in March 2020 following your request.

If the Onondaga Nation has any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642. The NYSDOT would like to express its appreciation of the Onondaga Nation's continued interest in this project.

Sincerely,

Angelo Trichilo 9/25/2020

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

AT/cl/bb
Encl: *Plan for Phase IB Archaeological Survey and Archaeological Monitoring During Construction including Data Recovery* (October 2017)

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

50 Wolf Road, Albany, NY 12232 | www.dot.ny.gov

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-81Viaduct 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 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.)

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,

James Finelli
Historic Preservation Program Analyst

NEW YORK STATE OF OPPORTUNITY. 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-81Viaduct 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 or 518-417-6642.

Sincerely,

Angelo Trichilo 10/20/2020

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

50 Wolf Road, Albany, NY 12232 | www.dot.ny.gov

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.)

NEW YORK STATE OF OPPORTUNITY. 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-81Viaduct 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 or 518-417-6642.

50 Wolf Road, Albany, NY 12232 | www.dot.ny.gov

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.)

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.

Sincerely,

Nancy Herter

Nancy Herter
Archaeology Unit Program Coordinator

NEW YORK STATE OF OPPORTUNITY. 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 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

50 Wolf Road, Albany, NY 12232 | www.dot.ny.gov

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
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

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

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

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

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
NewYork.FHWA@dot.gov

November 7, 2020

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 FHWAs 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

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.

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

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

December 4, 2020

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

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 be eligible for the National Register, archeological 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 IA 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 IB 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 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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

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 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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

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 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

NEW YORK STATE OF OPPORTUNITY. | 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.

Sincerely,

Nancy Herter

Nancy Herter
Archaeology Unit Program Coordinator

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

February 10, 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: Finding Document***
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 submitting the enclosed *Finding Documentation* 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 identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. Applying the *criteria of adverse effect* (36 CFR Part 800.5(a)(1)), the NYSDOT has documented that the Viaduct Alternative would cause *adverse effects* on the National Register-listed North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of historic buildings. The Community Grid Alternative has been identified as the Project's preferred alternative, as indicated in the Draft Environmental Impact Statement (DEIS), and would cause no adverse effects on historic architectural properties identified within the Project's APE. Minor acquisitions of land from twelve (12) historic properties are proposed under the Community Grid Alternative, with no changes to the contributing features that qualify these properties for the National Register; therefore, the Project would have no adverse effects on the following historic properties based on the assessment of effects for the preferred alternative:

- Learbury Centre (329 North Salina Street), North Salina Street Historic District Expansion
- NY Central Railroad Complex (815 Erie Boulevard, 400 Burnet Avenue and 711-21 Erie Boulevard)
- Veteran's Fastener Supply Corporation Building (117 Butternut Street)
- Peck Hall (309 South McBride Street) - temporary easement only
- Reid Hall (610 East Fayette Street) - temporary easement only
- Howard & Jennings Pump Factory (123-29 Willow Street East)
- C.C. Bradley Plant (432 Franklin St North to Clinton)
- Syracuse Lighting Co. Plant (311 Genant Drive to Clinton Street North)

- Saint John the Evangelist Church (215 North State Street)
- Weighlock Building (301 East Water Street)
- Remington (Monarch) Typewriter Company Building (429 North Franklin Street)
- Former Easy Washing Machine Co. (currently Destiny Arms) (800 Clinton Street North)

In accordance with FHWA guidance and Section 6009 provisions of Public Law 109-59 (SAFETEA-LU), the NYSDOT is notifying the SHPO of the FHWA's intent to make Section 4(f) *de minimis* use findings for these individual properties based on Section 106 determinations of "no adverse effect" and the written concurrence of the SHPO.

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

Based on review of the enclosed document, the NYSDOT respectfully requests the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a PA to provide for a phased assessment of effects on archaeological resources.

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

Sincerely,

Angelo Trichilo 2/10/2021

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

AT/cl/bb
Encl: *Finding Documentation* for the I-81 Viaduct Project

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.)
M. Frechette, NYSDOT (w/out encl.)

NEW YORK STATE OF OPPORTUNITY. Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

March 4, 2021

Angelo Trichilo, P.E.
Acting Director, Office of Environment
NYS Department of Transportation
50 Wolf Road
Albany, NY 12232
(via email)

Re: FHWA/DOT
Interstate 81 (I-81) Viaduct Project/PIN 3501.60
Syracuse, Onondaga County
16PR06314

Dear Mr. Trichilo:

Thank you for your ongoing consultation with the State Historic Preservation Office (SHPO). We continue to review this project 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 are in receipt of your agency's Section 106 Finding Document (February 2021) prepared for this undertaking. After reviewing this material, our office concurs with the steps taken by the Federal Highway Administration (FHWA) to identify historic resources. This assessment reviewed information on 695 buildings and structures, which included 3 historic districts and 82 individual properties that were individually listed in or determined to be eligible for inclusion in the National Register of Historic Places.

Regarding potential archaeological resources within the project's area of potential effect, Phase I and Phase IB surveys have been completed in the accessible areas of the project's area of potential effect (APE). This work, to date, has not identified any sites that would be eligible for inclusion in the National Register. However, we do concur that additional survey work will be required as this undertaking progresses.

Regarding the proposed project alternatives, we note that the undertaking initially proposed several options. These various proposals were narrowed to a new Viaduct option, a Community Grid option, and a No-Build proposal. Based on our review of the construction options, we concur with your agency's potential individual resource effects found in Appendix B of the Finding Document.

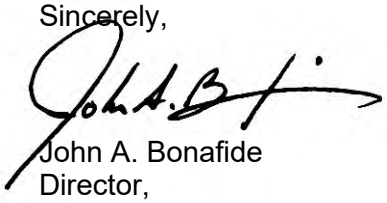
Based upon our review of this information, we concur with your recommendation that the Viaduct option would have an adverse effect on historic resources. Under this proposal, 11 buildings that are eligible for or listed in the National Register would be demolished. We also concur with the finding that the Street Grid proposal, which requires no historic building demolition, would not adversely affect historic above-ground resources.

However, the full potential effects of both options on archaeological resources remain unknown at this time.

As a result, the SHPO agrees with your agency's recommendation to FHWA that they seek to develop a Programmatic Agreement that would guide the remainder of the Section 106 consultation process as this undertaking proceeds. This approach will allow for the archaeological assessment to continue and will ensure ongoing and productive Consulting Party consultation on any sites that may be identified during this work.

If I can be of any further assistance, please do not hesitate to contact me at john.bonafide@parks.ny.gov.

Sincerely,



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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

March 12, 2021

John Auwaerter, Board Member
PO Box 15065
Syracuse, New York 13215

RE: ***National Historic Preservation Act, Section 106 Consulting Party Meeting Developing a Programmatic Agreement***
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear John Auwaerter:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), cordially invites you to participate in a virtual meeting to be held on March 31, 2021 at 2:00 p.m.

The purpose of this meeting is to engage Consulting Parties in the development of a Programmatic Agreement (PA) to move forward with the Section 106 process for the Project. The FHWA, in coordination with the NYSDOT and in consultation with the New York State Historic Preservation Office (SHPO), has determined the need for a PA pursuant to 36 CFR § 800.14(b)(1)(ii) because the Project's effects on historic properties cannot be fully determined prior to approval of the undertaking. A PA will provide a framework to complete the remaining steps in the process to consider effects on any archaeological properties that may be identified as the Project is advanced through construction.

Please respond to this invitation no later than the close of business on March 26, 2021 by contacting the NYSDOT Main Office: Jessica Prockup, NYSDOT, at (518) 417-6642 or Jessica.Prockup@dot.ny.gov. A WebEx invitation will be sent to you using the e-mail address provided in your response.

Sincerely,

Angelo Trichilo
3/12/2021

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

AT/cl/bb

SAMPLE

cc: R. Davies, FHWA
J. Gross, FHWA
M. Ranslow, ACHP
J. Bonafide, NYSOPRHP/SHPO
N. Herter, NYSOPRHP/SHPO
M. Frechette, NYSDOT

SAMPLE

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

March 15, 2021

Faithkeeper Anthony Gonyea
Rt 11A
Box 3236
Onondaga Nation
via Nedrow, NY 13120

RE: ***National Historic Preservation Act, Section 106 Consultation***
Developing a Programmatic Agreement
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear Faithkeeper Gonyea:

As part of continuing consultation for the Interstate 81 (I-81) Viaduct Project (the Project) among the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the Tuscarora 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 regulation (36 CFR Part 800), the NYSDOT, in coordination with the FHWA, cordially invites you to participate in a virtual meeting to be held on March 31, 2021 at 2:00 p.m.

The purpose of this meeting is to engage the Onondaga Nation, the Tuscarora Nation, and other Consulting Parties in the development of a Programmatic Agreement (PA) to move forward with the Section 106 process for the Project. The FHWA, in coordination with the NYSDOT and in consultation with the SHPO, has determined the need for a PA pursuant to 36 CFR § 800.14(b)(1)(ii) because the Project's effects on historic properties cannot be fully determined prior to approval of the undertaking. A PA will provide a framework to complete the remaining steps in the process to consider effects on any archaeological properties that may be identified as the Project is advanced through construction.

Please respond to this invitation no later than the close of business on March 26, 2021 by contacting the NYSDOT Main Office: Jessica Prockup, NYSDOT, at (518) 417-6642 or Jessica.Prockup@dot.ny.gov. A WebEx invitation will be sent to you using the e-mail address provided in your response.

Sincerely,

Angelo Trichilo 3/15/2021

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

AT/cl/bb

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

March 15, 2021

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

RE: ***National Historic Preservation Act, Section 106 Consultation***
Developing a Programmatic Agreement
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear Mr. Printup:

As part of continuing consultation for the Interstate 81 (I-81) Viaduct Project (the Project) among the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the Tuscarora 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 regulation (36 CFR Part 800), the NYSDOT, in coordination with the FHWA, cordially invites you to participate in a virtual meeting to be held on March 31, 2021 at 2:00 p.m.

The purpose of this meeting is to engage the Onondaga Nation, the Tuscarora Nation, and other Consulting Parties in the development of a Programmatic Agreement (PA) to move forward with the Section 106 process for the Project. The FHWA, in coordination with the NYSDOT and in consultation with the SHPO, has determined the need for a PA pursuant to 36 CFR § 800.14(b)(1)(ii) because the Project's effects on historic properties cannot be fully determined prior to approval of the undertaking. A PA will provide a framework to complete the remaining steps in the process to consider effects on any archaeological properties that may be identified as the Project is advanced through construction.

Please respond to this invitation no later than the close of business on March 26, 2021 by contacting the NYSDOT Main Office: Jessica Prockup, NYSDOT, at (518) 417-6642 or Jessica.Prockup@dot.ny.gov. A WebEx invitation will be sent to you using the e-mail address provided in your response.

Sincerely,

Angelo Trichilo 3/15/2021

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
J. Bonafide, NYSOPRHP/SHPO
N. Herter, NYSOPRHP/SHPO
M. Frechette, NYSDOT

April 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: Finding Document***
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), previously submitted the *Finding Documentation* 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) on February 10, 2021. On March 4, 2021, the SHPO provided a response, stating that "… we concur with your recommendation that the Viaduct option would have an adverse effect on historic resources. Under this proposal, 11 buildings that are eligible for or listed in the National Register would be demolished. We also concur with the finding that the Street Grid proposal, which requires no historic building demolition, would not adversely affect historic above-ground resources."

Since your review of the *Finding Documentation*, the NYSDOT has revised the document in two locations to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There have been no changes or updates to the assessment of effects on any of the identified historic properties.

In TABLE 1: Proposed Changes under Build Alternatives – Direct Effects, text has been added to identify the following three (3) properties as both individually eligible for or listed in the National Register of Historic Places, as well as contributing resources to the recently identified Franklin Square Historic District:

- #31 - Remington (Monarch) Typewriter Company Building (429 North Franklin Street)
- #33 - C.C. Bradley Plant (432 Franklin St North to Clinton)
- #34 - Syracuse Lighting Co. Plant (311 Genant Drive to Clinton Street North)

In addition, the bulleted list of historic properties that would experience no adverse effects under the Community Grid Alternative (page 26) has been revised for consistency with the existing Section 106 record, including the assessment of effects as recorded in the February 10, 2021 Finding Documentation, Table 1. The bulleted list on page 26 has been corrected to

include the following historic properties, which were inadvertently omitted from the list in the February 10, 2021 document.

- VIP Structures property (471-81 Oswego Boulevard)
- The Heritage at Loretto (312 Fillmore Avenue)
- Syracuse Herald Building (212 Herald Place)

The bulleted list on page 26 has been further corrected to remove the following historic property, which was inadvertently included within the list in the February 10, 2021 document.

- Weighlock Building (301 East Water Street)

The revised Finding Document concludes that minor acquisitions of land from fourteen (14) historic properties are proposed under the Community Grid Alternative, with no changes to the contributing features that qualify these properties for the National Register. Therefore, the Project would have no adverse effects on the following historic properties based on the assessment of effects for the preferred alternative:

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

In accordance with 23 CFR 774.5(b)(ii), the NYSDOT is notifying the SHPO of the FHWA's intent to make Section 4(f) de minimis use findings for these individual properties based on Section 106 determinations of "no adverse effect" and the written concurrence of the SHPO.

Enclosed, please find the revised *Finding Documentation* for the Project. The NYSDOT respectfully requests the written concurrence of the SHPO with NYSDOT recommendations regarding the assessment of effects for the updated (corrected) list of properties identified above.

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

Sincerely,

Angelo Trichilo

4/8/2021

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

AT/cl/bb
Encl: *Finding Documentation* for the I-81 Viaduct Project

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.)
M. Frechette, NYSDOT (w/out encl.)

March 22, 2021

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: Finding Documentation***
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear Mr. Gross:

Enclosed is the *Finding Documentation* prepared for the Interstate 81 (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), on behalf of the Federal Highway Administration (FHWA), transmitted this report to the New York State Historic Preservation Office (SHPO) on February 10, 2021. The *Finding Documentation* will also be distributed to Consulting Parties concurrent with the public comment period for the Draft Environmental Impact Statement (DEIS). This electronic copy of the Finding Documentation Report is provided for your use in coordinating with the Advisory Council on Historic Preservation (ACHP).

The identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT documented an assessment of effects, applying the *criteria of adverse effect* (36 CFR Part 800.5(a)(1)) to identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that are evaluated in the DEIS for the Project. In accordance with 36 CFR §800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. As described in the *Finding Documentation*, the development of a Programmatic Agreement is proposed pursuant to 36 CFR §800.14(b)(1)(ii) because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

The Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

As a result of design modifications and refinements, proposed changes to identified historic properties under the Community Grid Alternative are limited to minor acquisitions of land from twelve (12) properties as needed for proposed highway and ramp construction and realignment.

The Community Grid Alternative includes no changes to the contributing features that qualify these properties for the National Register. Therefore, the preferred alternative would have *no adverse effects* on the following historic properties based on the assessment of effects:

- Learbury Centre (329 North Salina Street), North Salina Street Historic District Expansion
- NY Central Railroad Complex (815 Erie Boulevard, 400 Burnet Avenue, and 711-21 Erie Boulevard)
- Veteran's Fastener Supply Corporation Building (117 Butternut Street)
- Peck Hall (309 South McBride Street) - temporary easement only
- Reid Hall (610 East Fayette Street) - temporary easement only
- Howard & Jennings Pump Factory (123-29 Willow Street East)
- C.C. Bradley Plant (432 Franklin Street North to Clinton Street)
- Syracuse Lighting Co. Plant (311 Genant Drive to Clinton Street North)
- Saint John the Evangelist Church (215 North State Street)
- Weighlock Building (301 East Water Street)
- Remington (Monarch) Typewriter Company Building (429 North Franklin Street)
- Former Easy Washing Machine Co. (currently Destiny Arms) (800 Clinton Street North)

In a letter dated March 4, 2021 (enclosed), the SHPO concurred with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE. The SHPO also agreed with the development of a Programmatic Agreement to guide the remainder of the Section 106 consultation process. At this time, the NYSDOT respectfully requests the concurrence of the FHWA with known effects on historic architectural properties, based on the provided documentation and consultation with the SHPO.

In accordance with 23 CFR § 774.3(b), the NYSDOT requests that the FHWA make Section 4(f) *de minimis* use determinations for the above-listed individual properties based on the written concurrence of the SHPO with Section 106 findings of *no adverse effect*.

If you have any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642.

Sincerely,

Angelo Trichilo 3/22/2021

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

AT/cl/bb
Encl: *Finding Documentation*
Letter from the SHPO, March 4, 2021

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.)

NEW YORK STATE OF OPPORTUNITY. Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

April 12, 2021

Angelo Trichilo, P.E.
Acting Director, Office of Environment
NYS Department of Transportation
50 Wolf Road
Albany, NY 12232
(via email)

Re: FHWA/DOT Interstate 81 (I-81) Viaduct Project/PIN 3501.60
Syracuse, Onondaga County
16PR06314

Dear Mr. Trichilo:

Thank you for your ongoing consultation with the State Historic Preservation Office (SHPO). We continue to review this project 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 are in receipt of the *updated* Finding Document and have reviewed the changes. The new documentation identifies 3 newly included historic buildings, the removal of one historic building from the list, and the addition of 14 minor land acquisitions that were not included in the previous version. After reviewing the new material, the NYSHPO finds no additional information that would alter our previous concurrence with your agency's findings. The comments in our letter of March 4, 2021 remain unchanged noting the amendments listed above.

If I can be of any further assistance, please do not hesitate to contact me at john.bonafide@parks.ny.gov.

Sincerely,

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

cc: CRIS Notification List

att: Letter, NYSHPO to NYSDOT, March 4, 2021

NEW YORK STATE OF OPPORTUNITY. Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

March 4, 2021

Angelo Trichilo, P.E.
Acting Director, Office of Environment
NYS Department of Transportation
50 Wolf Road
Albany, NY 12232
(via email)

Re: FHWA/DOT
Interstate 81 (I-81) Viaduct Project/PIN 3501.60
Syracuse, Onondaga County
16PR06314

Dear Mr. Trichilo:

Thank you for your ongoing consultation with the State Historic Preservation Office (SHPO). We continue to review this project 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 are in receipt of your agency's Section 106 Finding Document (February 2021) prepared for this undertaking. After reviewing this material, our office concurs with the steps taken by the Federal Highway Administration (FHWA) to identify historic resources. This assessment reviewed information on 695 buildings and structures, which included 3 historic districts and 82 individual properties that were individually listed in or determined to be eligible for inclusion in the National Register of Historic Places.

Regarding potential archaeological resources within the project's area of potential effect, Phase I and Phase IB surveys have been completed in the accessible areas of the project's area of potential effect (APE). This work, to date, has not identified any sites that would be eligible for inclusion in the National Register. However, we do concur that additional survey work will be required as this undertaking progresses.

Regarding the proposed project alternatives, we note that the undertaking initially proposed several options. These various proposals were narrowed to a new Viaduct option, a Community Grid option, and a No-Build proposal. Based on our review of the construction options, we concur with your agency's potential individual resource effects found in Appendix B of the Finding Document.

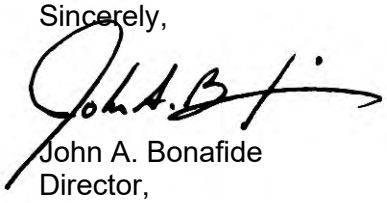
Based upon our review of this information, we concur with your recommendation that the Viaduct option would have an adverse effect on historic resources. Under this proposal, 11 buildings that are eligible for or listed in the National Register would be demolished. We also concur with the finding that the Street Grid proposal, which requires no historic building demolition, would not adversely affect historic above-ground resources.

However, the full potential effects of both options on archaeological resources remain unknown at this time.

As a result, the SHPO agrees with your agency's recommendation to FHWA that they seek to develop a Programmatic Agreement that would guide the remainder of the Section 106 consultation process as this undertaking proceeds. This approach will allow for the archaeological assessment to continue and will ensure ongoing and productive Consulting Party consultation on any sites that may be identified during this work.

If I can be of any further assistance, please do not hesitate to contact me at john.bonafide@parks.ny.gov.

Sincerely,



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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

April 14, 2021

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 April 1, 2021. The NYSDOT Office of Environment, in coordination with the NYSDOT Region 3 office, has reviewed the enclosed request and recommends that Michael La Flair, Director of Community and Government Relations, and acting on behalf of Housing Visions, be granted Consulting Party status based on his written statement of interest.

We respectfully request FHWA approval of Michael La Flair, Director of Community and Government Relations, and acting on behalf of Housing Visions, 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.

Sincerely,

Angelo Trichilo
4/14/2021

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

AT/cl/bb

Encl: Michael La Flair, Section 106 Consulting Party e-mail request, April 1, 2021

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.)

NEW YORK STATE OF OPPORTUNITY. Parks, Recreation and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

April 15, 2021

Angelo Trichilo, P.E.
Acting Director, Office of Environment
NYS Department of Transportation
50 Wolf Road
Albany, NY 12232
(via email)

Re: FHWA/DOT Interstate 81 (I-81) Viaduct Project/PIN 3501.60
Syracuse, Onondaga County
16PR06314

Dear Mr. Trichilo:

Thank you for your ongoing consultation with the State Historic Preservation Office (SHPO). We continue to review this project 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.

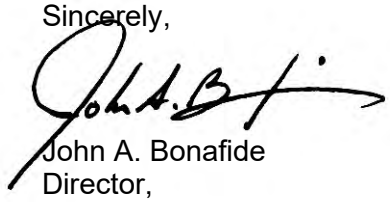
We are in receipt of the updated Finding Document and have reviewed the changes. The new information relates to minor property acquisitions involving National Register listed or eligible resources. The identified resources include associated with these changes include:

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

Based upon our review of the submitted information, the NYSHPO concurs with your agency's recommendation that the proposed actions will have No Adverse Effect upon these historic resources.

If I can be of any further assistance, please do not hesitate to contact me at john.bonafide@parks.ny.gov.

Sincerely,



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

cc: CRIS Notification list

U.S. Department of Transportation
Federal Highway Administration

New York Division

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NewYork.FHWA@dot.gov

April 16, 2021

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 April 14 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:

- Michael La Flair, Director of Community and Government Relations, and acting on behalf of Housing Visions with expressed concern with the undertaking's effects on providing quality affordable housing

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

April 20, 2021

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: Finding Documentation***
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear Mr. Gross:

Enclosed is the updated *Finding Documentation* prepared for the Interstate 81 (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), on behalf of the Federal Highway Administration (FHWA), also transmitted this updated report to the New York State Historic Preservation Office (SHPO) on April 8, 2021. This electronic copy of the Finding Documentation Report is provided for your use in coordinating with the Advisory Council on Historic Preservation (ACHP).

As described in the Finding Documentation dated April 2021, the Project's effects on historic properties cannot be fully determined at this time, pending the completion of additional archaeological investigations just before and during construction. Therefore, the revised Finding Documentation provides an evaluation of known effects on above-ground resources identified within the Project's area of potential effects (APE). The Viaduct Alternative would cause adverse effects on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause no adverse effects on historic architectural properties identified within the Project's APE.

The revised Finding Documentation concludes that minor acquisitions of land from fourteen (14) historic properties, as proposed under the Community Grid Alternative, would cause no changes to the contributing features that qualify these properties for the National Register. Therefore, the Project would have no adverse effects on the following historic properties based on the assessment of effects for the preferred alternative:

1. Learbury Centre (329 North Salina Street), North Salina Street Historic District & Expansion
2. NY Central Railroad Complex (815 Erie Boulevard, 400 Burnet Avenue, and 711-21 Erie Boulevard)
3. Veteran's Fastener Supply Corporation Building (117 Butternut Street)

4. Peck Hall (309 South McBride Street) - temporary easement only
5. Reid Hall (610 East Fayette Street) - temporary easement only
6. Syracuse Herald Building (212 Herald Place)
7. Howard & Jennings Pump Factory (123-29 Willow Street East)
8. C.C. Bradley Plant (432 Franklin St North to Clinton), Franklin Square Historic District
9. Syracuse Lighting Co. Plant (311 Genant Drive to Clinton Street North), Franklin Square Historic District
10. Saint John the Evangelist Church (215 North State Street)
11. VIP Structures (471-81 Oswego Boulevard)
12. Remington (Monarch) Typewriter Company Building (429 North Franklin Street), Franklin Square Historic District
13. Former Easy Washing Machine Co. (currently Destiny Arms) (800 Clinton Street North)
14. The Heritage at Loretto (312 Fillmore Avenue)

In a letter dated April 12, 2021, the SHPO found that no additional information provided in the updated Finding Documentation (April 2021) would alter the previous concurrence provided in its March 4, 2021 letter, which stated that the Community Grid Alternative would not adversely affect historic above-ground resources. The SHPO letter dated April 12, 2021 acknowledged the clarification of the final bulleted list noted above, which was revised for consistency with the existing Section 106 record. In a letter dated April 15, 2021, the SHPO concurred that the proposed actions will have No Adverse Effect upon the fourteen (14) National Register listed or eligible resources as a result of minor acquisitions of land proposed under the Community Grid Alternative.

In accordance with 23 CFR §774.11(e)(1), Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966 applies to the above-listed historic properties. Temporary construction easements consisting of minor strips of land along the edge of two properties, Peck Hall (#4) and Reid Hall (#5), are proposed to provide access for sidewalk reconstruction and demolition of the existing viaduct. The duration of the work would be temporary and less than the time needed for construction of the project. There would be no change in ownership of the land and no temporary or permanent physical impacts to the historic buildings or contributing features that qualify the properties for Section 4(f) protection. Following construction, the land would be returned to a condition at least as good as that which existed prior to the Project. Based on review of the Section 106 Finding Documentation, the SHPO concurs that the Project will have no adverse effects on Peck Hall and Reid Hall. The NYSDOT concludes that the conditions listed under 23 CFR §774.13(d) are satisfied, and that the temporary occupancies of land from Peck Hall and Reid Hall do not constitute a use of the Section 4(f) properties.

As described in the Section 106 Finding Documentation, the Community Grid Alternative would include the permanent incorporation of land from the remaining twelve (12) historic properties (#1-3 and #6-14) into the transportation facility.

At this time, the NYSDOT respectfully requests the concurrence of the FHWA with the evaluation of known effects on historic architectural properties, based on the provided documentation and consultation with the SHPO. In accordance with 23 CFR §774.3(b), the NYSDOT requests that the FHWA make Section 4(f) determinations of *de minimis* use for twelve (12) of the above-listed individual properties based on the written concurrence of the SHPO with Section 106 findings of *no adverse effect*.

If you have any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642.

Sincerely,

Angelo Trichilo 4/20/2021

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

AT/cl/bb
Encl: *Finding Documentation (April 2021)*
SHPO letter dated March 4, 2021
SHPO letter dated April 12, 2021
SHPO letter dated April 15, 2021

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

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NewYork.FHWA@dot.gov

April 23, 2021

In Reply Refer To:
HPD-NY

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

Attn: Mandy Ranslow, Program Analyst

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

Dear Mr. Nelson:

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 Advisory Council on Historic Preservation (ACHP) agreed to be a Cooperating Agency in accordance with the NEPA process on November 15, 2013.

The FHWA previously notified the ACHP of the undertaking and invited the ACHP to participate in the Section 106 consultation process due to the complex and challenging issues associated with the undertaking in letters dated June 16, 2014 and April 11, 2016. The ACHP agreed to participate in the Section 106 consultation process on November 27, 2017.

In accordance with the provisions of 36 CFR 800.6, we advise you that in consultation with the New York State Historic Preservation Office, we have determined that the Viaduct Alternative would result in an *adverse effect* to historic resources, and the Community Grid Alternative (preferred alternative) would have *no adverse effect* on historic architectural resources. A phased process to identify and evaluate archaeological resources will be completed during the construction phase per 36 CFR 800.5(a)(3). A Programmatic Agreement will be developed in accordance with 36 CFR 800.14(b)(1) to outline the continued Section 106 consultation process and assessment for archaeological resources.

In accordance with article 800.6(a)(1), we are enclosing the documentation specified in article 800.11(e), including a letter from the New York State Historic Preservation Office (SHPO) in which they provided an opinion that based on their review of the submitted information the Viaduct Alternative would have an *adverse effect* on historic resources and the Community Grid Alternative will have *no adverse effect* upon historic architectural resources. The SHPO also agreed with the recommendation to develop a Programmatic Agreement to guide the remainder of the Section 106 consultation process.

If you have any questions, please feel free to contact me at (518) 431-8855.

Sincerely,

Jared A. Gross, P.E.
Area Engineer

Enclosures:

Section 106 Finding Documentation (via File Transfer)
Section 106 Finding Documentation Appendices A thru D (via File Transfer)
NYSHPO Section 106 Letters (3) (via File Transfer)

cc: M. Lynch, Division Director, NYSHPO - 16PR06314 (w/o encl)
J. Bonafide, Director, Technical Preservation Services Bureau, NYSHPO (w/o encl)
M. Ranslow, ACHP (w/encl)
A. Trichilo, Deputy Chief Engineer, Office of Environment, NYSDOT (w/o encl)
J. Prockup, Office of Environment, NYSDOT (w/o encl)
M. Frechette, Project Director, NYSDOT, Region 3 (w/o encl)
R. Davies, FHWA, HPD-NY (w/o encl)
D. Clarke, FHWA, HEPE (w/o encl)

U.S. Department of Transportation
Federal Highway Administration

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April 23, 2021

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 Consultation
Interstate 81 Viaduct Project
City of Syracuse, Onondaga County

Dear Mr. Trichilo:

Please reference your letter dated April 20 requesting our review and concurrence with the known effects under 36 CFR Part 800 on historic architectural properties.

The New York State Department of Transportation (NYSDOT) applied the criteria of adverse effect in accordance with 36 CFR 800.5(a) to identified architectural properties within the area of potential effects (APE) for the Viaduct Alternative and Community Grid Alternative combined footprint. NYSDOT concluded that the Viaduct Alternative would result in an *adverse effect* on historic architectural properties listed or eligible for inclusion on the National Register (NR) of Historic Places. NYSDOT concluded that the Community Grid Alternative (preferred alternative) will have *no adverse effect* on NR-eligible or -listed historic architectural properties within the APE.

A phased process to identify and evaluate archaeological resources will be completed during the construction phase per 36 CFR 800.5(a)(3). A Programmatic Agreement will be developed in accordance with 36 CFR 800.14(b)(1) to outline the continued Section 106 consultation process and assessment for archaeological resources.

On March 4, the New York State Historic Preservation Office (SHPO) provided an opinion that based on their review of the submitted information the Viaduct Alternative would have an *adverse effect* on historic resources and the Community Grid Alternative will have *no adverse effect* upon historic architectural resources. The SHPO also agreed with the recommendation to develop a Programmatic Agreement to guide the remainder of the Section 106 consultation process. Additional information related to minor property acquisition was added to the Section 106 Finding Documentation following the initial SHPO review. The SHPO provided a letter dated April 15 confirming the previous opinions were still valid.

We notified and provided a copy of the Section 106 Finding Documentation to the Advisory Council on Historic Preservation (ACHP) by letter dated April 23 in which the NYSDOT was carbon copied. The ACHP has previously agreed to participate in the Section 106 consultation to resolve the potential effects and is a federal Cooperating Agency for the National Environmental Policy Act (NEPA) process.

We have reviewed the information provided and have determined that the Viaduct Alternative would result in an *adverse effect* to historic resources, and the Community Grid Alternative would have *no adverse effect* on historic architectural resources. The Federal Highway Administration (FHWA) concurs with developing a Programmatic Agreement to outline the continued Section 106 consultation process and assessment for archaeological resources.

If you have any questions, please feel free to contact me at (518) 431-8855.

Sincerely,

Jared A. Gross, P.E.
Area Engineer

cc: M. Lynch, Division Director, NYSHPO (16PR06314)
J. Bonafide, Director, Technical Preservation Services Bureau, NYSHPO
M. Ranslow, ACHP
J. Prockup, Office of Environment, NYSDOT
M. Frechette, Project Director, NYSDOT, Region 3
R. Davies, FHWA, HPD-NY
D. Clarke, FHWA, HEPE

U.S. Department of Transportation
Federal Highway Administration

New York Division

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NewYork.FHWA@dot.gov

May 4, 2021

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 4(f) *De Minimis* Consultation
Interstate 81 Viaduct Project
City of Syracuse, Onondaga County

Dear Mr. Trichilo:

Please reference your letter dated April 20 requesting that the Federal Highway Administration (FHWA) make a Section 4(f) *de minimis* use determination in accordance with 23 CFR Part 774 for twelve individual historic architectural properties for the subject project, listed below.

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

The New York State Historic Preservation Office (SHPO) has been informed of FHWAs intent to make a Section 4(f) *de minimis* use finding as a result of their concurrence with the *no adverse effect* determination for known effects under Section 106 for the Community Grid Alternative.

The proposed use of the Section 4(f) property for the subject project is considered minor and will not adversely affect the features, attributes, or activities that qualify for protection under Section 4(f). We have determined that the project will have a Section 4(f) *de minimis* use on the twelve historic architectural resources above.

Your letter also indicated that temporary construction easements will occur at two properties eligible for protection under Section 4(f):

- Peck Hall (309 South McBride Street)
- Reid Hall (610 East Fayette Street)

The duration of work at these properties will be temporary and no change in ownership of the property will occur and the scope of work is limited to minor strip takings at the edge of the properties. There are no anticipated permanent adverse physical impacts nor interference with the protected activities, features, or attributes of the property on a temporary or permanent basis and the land will be fully restored. The SHPO, as the official with jurisdiction over these Section 4(f) resources, has agreed with these conditions through their concurrence with the *no adverse effect* determination under Section 106. In accordance with 23 CFR 774.113(d), as a result of these conditions being satisfied, the temporary occupancies of land at Peck Hall and Reid Hall are considered minimal and there is *No Use* within the meaning of Section 4(f).

The requirements of 23 CFR Part 774 have been met for this project.

If you have any questions, please feel free to contact me at (518) 431-8855.

Sincerely,

Jared A. Gross, P.E.
Area Engineer

cc: M. Lynch, Division Director, NYSHPO (16PR06314)
J. Bonafide, Director, Technical Preservation Services Bureau, NYSHPO
J. Prockup, Office of Environment, NYSDOT
M. Frechette, Project Director, NYSDOT, Region 3
R. Davies, FHWA, HPD-NY
D. Clarke, FHWA, HEPE

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

May 12, 2021

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

Re: Draft Programmatic Agreement Outline for I-81 Project

Dear Jared:

After our meeting on April 27 to review the draft Programmatic Agreement (PA) outline and subsequent discussions with Anthony Gonyea and Tiffany Lee, the Onondaga Nation has a few comments on the outline. We appreciate the opportunity to be involved with the development of the PA at this initial stage. Given the limited information that can be included in an initial outline, however, we would like to stress that our comments are not comprehensive but reflect obvious concerns or flag issues that we expect will require additional discussion and negotiation as the PA is developed.

The draft PA uses the terms "tribe" and "tribal" repeatedly. The Onondaga Nation does not refer to itself in these terms. These references should be replaced with a variant of the appropriate term, which is "Native Nation." For example, Paragraph 10, which is currently titled "Tribal Consultation," should be revised to read "Native Nation Consultation."

In paragraph 2, the PA references professional standards set by the Department of the Interior (DOI) and other federal agencies for archaeologists. Based on our review, these standards focus on general academic training in archaeology with passing reference to field work, but do not require any region-specific or Native Nation-specific training or experience. In addition, these standards do not incorporate the experiential or academic training and cultural fluency that will be required for Cultural Resource Monitors (CRMs). To avoid confusion, this standard should recognize that CRMs will be held to different standards to be established by the Nation and that, in addition to the basic professional standards set by the DOI, archaeologists with training or experience in Haudenosaunee history and culture will be preferred, given the importance of this knowledge base to the project.

The paragraphs on consultation for pre- and post-review discoveries of archaeological artifacts and/or human remains are central to the Nation. With respect to Paragraph 4: Consultation on Archaeological Properties, we are unsure whether the decision to have CRMs on-site for construction also applies to any remaining pre-construction archaeological assessments. As we understand it, this involves "machine aided" testing, which is being proposed for sensitive areas that are currently inaccessible but will be uncovered prior to construction. If that is correct, CRMs should certainly be present on site during this work. Details of this agreement may not have to be part of the PA itself, but we wanted to flag this as an issue for future discussion.

Paragraph 6, which focuses on post-review archaeological discoveries, does not discuss Nation notification. The presence of CRMs on-site may resolve any issues with inadvertent discoveries of archaeological artifacts during construction. However, in the unlikely circumstance that archaeological materials are found during construction at a site without a CRM, the Nation should be notified and given an opportunity to inspect the site for indications that the artifacts are Haudenosaunee and to consult on the response. Materials that appear to be European at first glance may be present in Haudenosaunee sites as well. Brass buttons, for example, were used decoratively by the Haudenosaunee and their presence does not necessarily mean that an archaeological find is a European or settler site.

In Paragraph 7, the draft PA outline incorporates the New York State Department of Transportation (NYS DOT) policy on inadvertent discovery of human remains. Again, while the presence of CRMs should alleviate issues with inadvertent discoveries of remains and the NYS DOT policy generally conforms to Nation expectations, there are two points of concern. First, the policy uses the term "Indian tribes" rather than "Native Nations." Second, under the NYS DOT policy, consultation with Native Nations is only initiated when police or local authorities that the remains are not part of a criminal investigation. The Nation prefers the New York State Historic Preservation Office (NY SHPO) policy, which initiates consultation with all potentially interested parties, including Native Nations, immediately upon inadvertent discovery of human remains. This practice better ensures that, if the remains are Haudenosaunee, they are treated appropriately throughout the investigation process.

Finally, we wanted to flag two provisions where we would suggest specific provisions/protections in the complete version of the PA. The confidentiality provisions in Paragraph 8 should explicitly acknowledge that the location of Native burial sites, whether the remains are left in place or relocated, will be kept confidential under Section 304 of the National Historic Preservation Act. The dispute resolution provisions in Paragraph 11 should describe or reference the ways in which consulting parties or other non-signatories can challenge or enforce provisions in the PA.

Thank you for your attention to these comments. Again, we expect that additional questions and concerns will arise as the Draft PA and its appendices are developed. In particular, we anticipate that the final designation of archaeologically sensitive areas within the Phase IB Work Plan and the scope of work for CRMs will require significant discussion. We look forward to participating in those discussions.

Sincerely,

Alma L. Lowry, Of Counsel

cc: Onondaga Council of Chiefs
Anthony Gonyea, Section 106 Representative
Tiffany Lee, Section 106 Consultant

May 28, 2021

Nancy Herter
Archaeology Unit Program Coordinator
NYS Office of Parks, Recreation & Historic Preservation
Peebles Island State Park - P.O. Box 189
Waterford, New York 12188-0189

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

Dear Ms. Herter:

The New York State Department of Transportation (NYSDOT), on behalf of the Federal Highway Administration (FHWA), is transmitting the enclosed memorandum to 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 at 36 CFR Part 800: *Protection of Historic Properties,* as part of continuing consultation. The memorandum has been prepared by Environmental Design & Research (EDR) to describe a refinement to the Area of Potential Effects (APE) for the I-81 Viaduct Project (the Project), evaluate the likelihood for archaeological resources to be present and affected in this area, and evaluate the potential for effects on above-ground historic properties due to the inclusion of proposed Noise Barriers 16A and 16B (collectively referred to as Noise Barrier 16A&B) in the Project. This refinement to the APE was conducted using the same method that was used to define the Project's initial APE.

The NYSDOT evaluated the likelihood for archaeological resources to be present and affected in the APE for Noise Barrier 16A&B. The archaeological assessment identified evidence of substantial prior ground disturbance throughout the entirety of the APE for Direct Effects related to Noise Barrier 16A&B. As a result of prior highway construction, no National Register eligible archaeological sites are anticipated to be located within the APE and no Phase IB archaeological investigations are recommended within the APE for Direct Effects for Noise Barrier 16A&B.

An analysis to identify above-ground historic architectural properties was also conducted. No buildings or structures that are 50 years old or over were identified within the APE for Noise Barrier 16A&B. As such, the evaluation determined that there would be no potential for effects on above-ground historic properties in the APE for Noise Barrier 16A&B due to the absence of buildings and structures meeting the criteria for eligibility for the National Register of Historic Places.

The NYSDOT respectfully requests the written concurrence of the SHPO with its recommendations for no archaeological testing within the APE for Noise Barrier 16A&B.

If you have any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642.

Sincerely,

Angelo Trichilo
5/28/2021

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

AT/cl/bb
Encl: Memorandum from EDR to NYSDOT for the I-81 Viaduct Project, dated May 2021

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.)

Environmental Design & Research,
Landscape Architecture, Engineering & Environmental Services, D.P.C.
217 Montgomery Street, Suite 1000, Syracuse, New York 13202
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memorandum

To:	Ms. Jessica Prockup New York State Department of Transportation Office of Environment Sent via email to: Jessica.Prockup@dot.ny.gov	EDR Project No: 13051
From:	Patrick Heaton, RPA; Matthew Victor Weiss, RPA Environmental Design & Research (EDR) Molly McDonald (AKRF, Inc.)	
Date:	May 14, 2021	
Reference:	I-81 Viaduct Project Onondaga County, New York PIN 3501.60 Section 106 Supplement – Noise Barrier 16A&B	

Introduction

In May 2021, the New York State Department of Transportation (NYSDOT) and Federal Highway Administration (FHWA) recommended that the I-81 Viaduct Project (the Project) include Noise Barrier 16A&B along the east side of I-81 between Exits 25A (New York State Thruway) and 26 (Mattydale; see Figure 1). The purpose of this memorandum is to describe this addition to the Area of Potential Effects (APE) for the Project, evaluate the likelihood for archaeological resources to be present and affected in this area, and evaluate the potential for effects on above-ground historic properties due to the recommended installation of Noise Barrier 16A&B.

Area of Potential Effect

In accordance with 36 CFR §800.16(d), the area of potential effects (APE) is defined as "the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if such properties exist." The APE establishes the geographical area for the identification of historic properties, including both potential archaeological resources associated with direct ground disturbance, and architectural resources which may be subject to direct or indirect effects. Based on a combined scope of work for both the Viaduct and Community Grid Alternatives, the APE for the Project was established by the NYSDOT and the FHWA in consultation with the New York State Historic Preservation Office (SHPO).

Within the APE, a smaller area was defined representing potential direct effects from physical alterations or ground disturbance associated with the Project. This area represents the combined limits of disturbance (LOD) of the Viaduct and Community Grid Alternatives and includes the area in which they have the potential to cause direct effects on historic properties. In the vertical dimension, the APE is defined by the depth of ground disturbance associated with proposed construction-related activities.

The recommendation to include Noise Barrier 16A&B in the Project has resulted in the need to refine the APE, to incorporate anticipated direct and indirect effects in the immediate vicinity of Noise Barrier 16A&B, applying the same method used to define the initial APE.

The Project's APE for Direct Effects was revised to include the proposed limits of disturbance for Noise Barrier 16A&B, which extends approximately 1.2 miles along the eastern side of northbound I-81 and the eastern half of the I-81 interchange with I-90/the New York State Thruway (Exit 25A), including areas within and adjacent to the entrance and exit ramps (see Figure 2). The limits of disturbance for Noise Barrier 16A&B add an additional 23.4 acres to the APE for Direct Effects. It is anticipated that the noise barrier will be installed on posts or piers spaced at intervals along the proposed barrier; the posts will be installed in drilled shafts that would likely extend between 15 and 21 feet below the ground surface. The eastern side of the APE for Direct Effects for Noise Barrier 16A&B is bounded by the Bear Trap Creek Bikeway (see Figure 2). Noise Barrier 16A&B is proposed to be installed between I-81 and this bike trail.

The Project's APE was revised to include the entirety of the limits of disturbance as well as additional portions of the right-of-way immediately adjacent to the proposed noise barrier. The APE includes a segment of the Bear Trap Creek Bikeway, which is located within the highway right-of way.

Archaeological Assessment

The APE for Direct Effects for Noise Barrier 16A&B is located within the mapped area of a previously reported archaeological site (NYSM 4281), recorded by Arthur C. Parker (1922: Plate 196) as "traces of occupation." No additional information is available regarding this site, but "traces of occupation" as used by Parker refers to general areas where Native American artifacts were reported in the early-twentieth century. These types of sites typically indicate areas of elevated archaeological sensitivity and are not equivalent to archaeological sites defined by formal testing with delineated site boundaries. The APE for Direct Effects for Noise Barrier 16A&B is located along Beartrap Creek (see Figure 2). The proximity of this stream and nearby "traces of occupation" suggests that the APE for Direct Effects for Noise Barrier 16A&B is sensitive for Native American archaeological resources.

As documented by historical maps, the APE for Direct Effects for Noise Barrier 16A&B has undergone multiple episodes of historical development, particularly related to this area's use for residential occupation and the construction of I-81 and I-90. The 1852 Fagan *Map of Onondaga County, New York* and 1859 French *Map of Onondaga County, New York* depict that from at least the mid-nineteenth century, the vicinity of Noise Barrier 16A&B was utilized for residential purposes and farmland, located halfway between two primary north/south-running roads (now U.S. Route 11 and Buckley Road). The APE for Direct Effects for Noise Barrier 16A&B changed relatively little throughout the nineteenth century (Fagan, 1852; French, 1859; Sweet, 1874; USGS, 1898). Since the early twentieth century, however, the vicinity of Noise Barrier 16A&B has become increasingly developed with an increase in residences and commercial enterprises (USGS, 1939; 1958; 1973). The population in the vicinity of Noise Barrier 16A&B has steadily grown since this time, resulting in the construction of several housing developments, particularly following the construction of I-81 (see Figure 2; USGS, 1939; 1958; 1973; Google Earth, 2021). Based on past land use, historic-period archaeological sensitivity within the APE for Direct Effects for Noise Barrier 16A&B is largely limited to domestic and residential resources.

A review of historic maps and aerial photographs, 1-meter digital elevation model (DEM) data, 2-foot contour data, and soil data indicate that the entirety of the APE for Direct Effects for Noise Barrier 16A&B has been previously disturbed by multiple phases of interstate highway construction throughout the mid-to-late twentieth century. The 1958 USGS *Syracuse West, NY* 1:24000 Topographic Quadrangle indicates that the majority of the APE for Direct Effects for Noise Barrier 16A&B was disturbed by the initial construction of northbound I-81. This is evident in 1-meter DEM and 2-foot

contour data, which indicate that the entire length of Noise Barrier 16A&B along I-81 is located on cut-and-filled and engineered terrain within and adjacent to the interstate (see Figure 3).

The original I-81 interchange with the New York State Thruway did not include any entrance or exit ramps within the APE for Direct Effects for Noise Barrier 16A&B at the time the highway was constructed. What would become Exit 25A is first depicted on the 1973 USGS *Syracuse West, NY* 1:24000 Topographic Quadrangle, following redesign of this interchange. The alignment of the entrance and exit ramps of this redesigned interchange differs from what exists today and is visible in 1966 historic aerial photographs (see Figure 4). The original entrance and exit ramps within the APE for Direct Effects for Noise Barrier 16A&B were more ovoid in alignment and farther to the north relative to their position today. Since this time, the interchange has been redesigned to its current layout (see Figure 2).

The construction of two different interchange designs at the southern end of the APE for Direct Effects for Noise Barrier 16A&B would have disturbed areas adjacent to and within the entrance and exit ramps of Exit 25A. This is evident in 1-meter DEM and 2-foot contour data, which indicate that this area consists of engineered landforms, indicative of extensive grading and artificial contouring for road construction, realignment/re-channelization of Beartrap Creek, and promoting drainage within the interchange (see Figure 3). Vegetation growth within the interchange is dominated by *phragmites,* which suggests the presence of poorly drained and disturbed soils (Google Earth, 2021). Furthermore, soils data indicate that the southern end of the APE for Direct Effects for Noise Barrier 16A&B is located on "Made Land," which consists of artificially created or modified terrain/landforms, indicative of substantial prior ground disturbance (see Figure 2; ESRI and NRCS, 2021).

Disturbance within the APE for Direct Effects for Noise Barrier 16A&B was confirmed by a previous Phase I archaeological survey conducted in 1977 by the Public Archaeology Facility (PAF, 1977:36). This survey excavated a single transect of shovel tests immediately adjacent to the east side of northbound I-81, extending from the New York State Thruway up to the Roxboro Road Middle School (PAF, 1977: Section C, Sheets 2 &3). No archaeological sites were identified by this survey (PAF, 1977:36, 38). The archaeological assessment described herein identified evidence of substantial prior ground disturbance throughout the entirety of the APE for Direct Effects related to Noise Barrier 16A&B. This disturbance is the result of multiple episodes of interstate construction that have been ongoing since the mid-twentieth century. As a result of prior highway construction, no National Register eligible archaeological sites are anticipated to be located within the APE and no Phase IB archaeological investigations are recommended within the APE for Direct Effects for Noise Barrier 16A&B.

Above-Ground Historic Properties

An architectural historian meeting the Secretary of the Interior's professional qualification standards evaluated the APE for Noise Barrier 16A&B to identify any above-ground historic architectural properties that might be present. This evaluation used the same methodology for identification of historic architectural properties described in the Finding Documentation for the Project. No historic architectural properties listed in or previously determined eligible for the National Register are located within the APE for Noise Barrier 16A&B. Furthermore, no buildings or structures that are 50 years old or over were identified within the APE for Noise Barrier 16A&B. Therefore, no properties meeting the National Register criteria for listing were identified in the APE for Noise Barrier 16A&B. As determined through this evaluation, there would be no potential effects on above-ground properties in the APE for Noise Barrier 16A&B due to the absence of buildings and structures meeting the criteria for eligibility for the National Register of Historic Places.

Attachments:

- Figure 1. Area of Potential Effects (APE)
- Figure 2. Noise Barrier 16A&B (Aerial)
- Figure 3. Noise Barrier 16A&B (DEM)
- Figure 4. 1966 Historic Aerial Imagery

References Cited:

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Noise Barrier 16A&B

Area of Potential Effect (APE) for Direct Effects

Area of Potential Effect (APE) for Indirect Effects

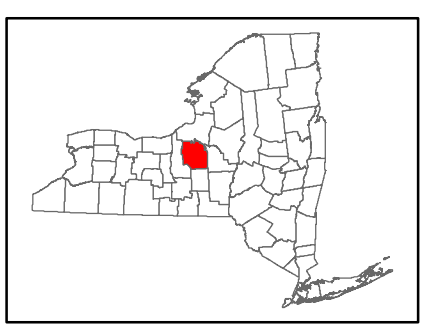
I-81 Viaduct Project

Onondaga County, New York

Figure 1: Area of Potential Effects (APE)

May 2021

Notes:
1. Basemap: ESRI ArcGIS Online "World Topographic Map" map service.
2. This is a color graphic. Reproduction in grayscale may misrepresent the data.



0 1,000 2,000 4,000 Feet

N W E S

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

U.S. Department of Transportation
Federal Highway Administration



I-81 Viaduct Project

Onondaga County, New York

Figure 2: Noise Barrier 16A&B (Aerial)

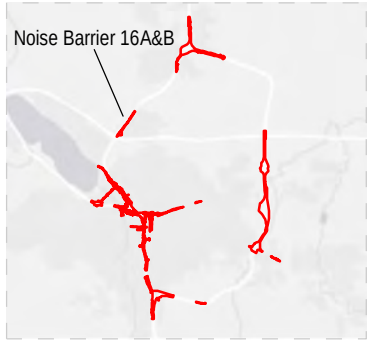
May 2021

Notes:
1. Basemap: ESRI ArcGIS Online "World Imagery" map service.
2. This is a color graphic. Reproduction in grayscale may misrepresent the data.

- Bear Trap Creek Bikeway

Mapped Soil Unit

- Cut and Fill Land
- Made Land
- Urban Land
- Area of Potential Effect (APE) for Direct Effects
- Area of Potential Effect (APE) for Indirect Effects



0 100 200 400 Feet

N W E S

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

U.S.Department of Transportation
Federal Highway Administration

Noise Barrier 16A&B

I-81 Viaduct Project

Onondaga County, New York

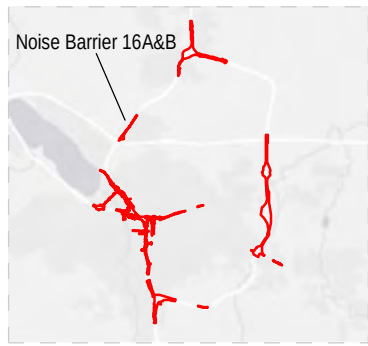
Figure 3: Noise Barrier 16A&B (DEM)

2-Foot Contour

Area of Potential Effect (APE) for Direct Effects

May 2021

Notes:
1. Basemap: 1-meter digital elevation model (DEM).
2. This is a color graphic. Reproduction in grayscale may misrepresent the data.

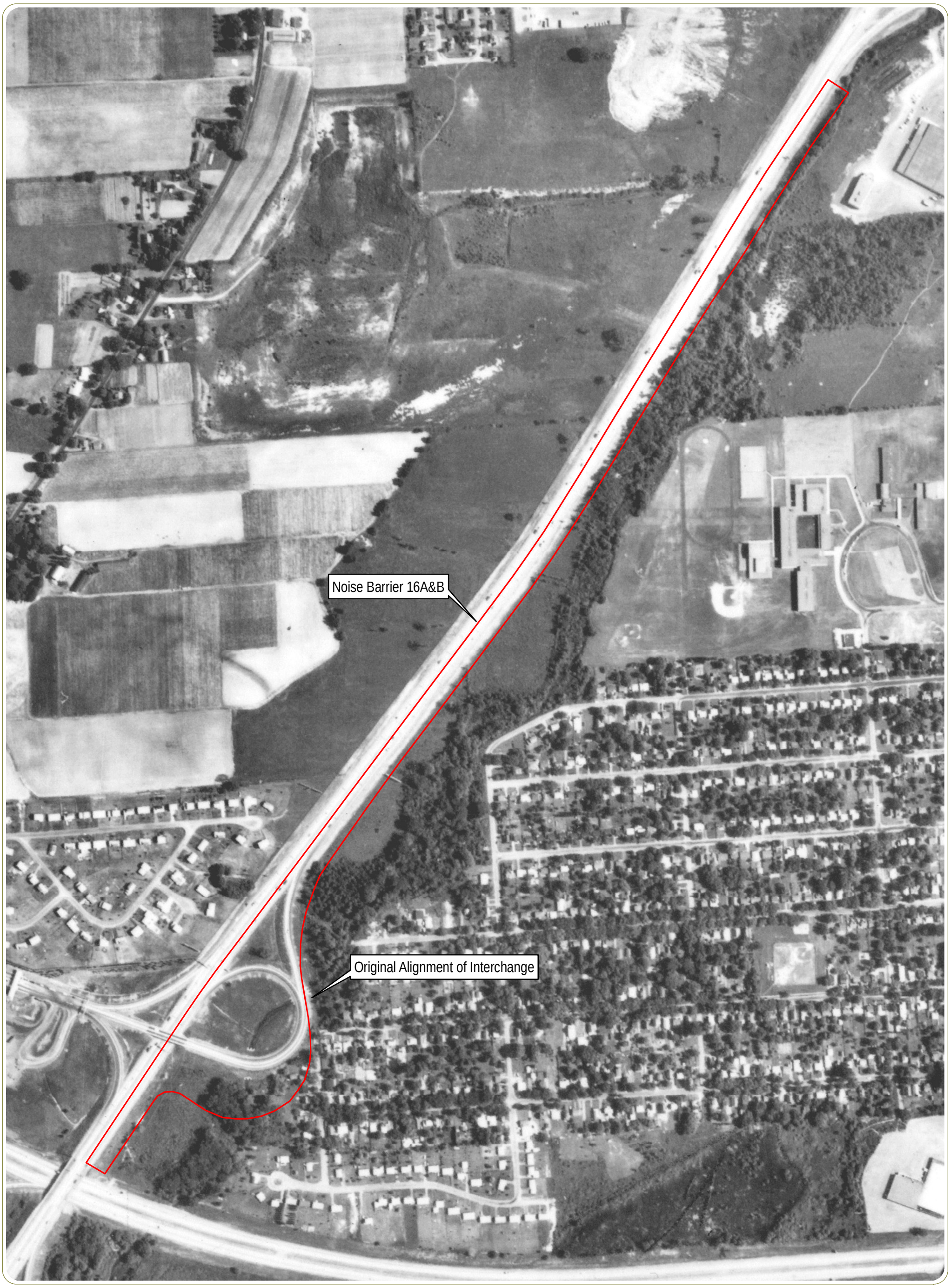


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N W E S

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

U.S. Department of Transportation
Federal Highway Administration



I-81 Viaduct Project

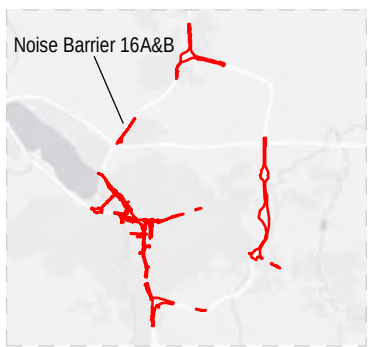
Onondaga County, New York

Figure 4: 1966 Historic Aerial Imagery

Area of Potential Effect (APE) for Direct Effects

May 2021

Notes:
1. Basemap: 1-meter digital elevation model (DEM).
2. This is a color graphic. Reproduction in grayscale may misrepresent the data.



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N W E S

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

U.S. Department of Transportation
Federal Highway Administration

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

June 18, 2021

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: RESPONSE TO ONONDAGA NATION COMMENTS***
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear Mr. Gross:

The New York State Department of Transportation (NYSDOT) is writing in response to comments and questions voiced by the Onondaga Nation during a Nation-to-Nation meeting with the Federal Highway Administration (FHWA) on April 14, 2021, as part of ongoing consultation for the development of a proposed Programmatic Agreement to advance the Section 106 process for the I-81 Viaduct Project (the Project), in Onondaga County, New York. As part of continuing Section 106 consultation among the New York State Historic Preservation Office (SHPO), the Onondaga Nation, the NYSDOT, and the FHWA, in accordance with 36 CFR Part 800, this correspondence provides responses and clarification to the Onondaga Nation's comments and questions.

The NYSDOT forwarded the Onondaga Nation's comments to the archaeological consultant for the Project, Environmental Design & Research, Landscape Architecture, Engineering, & Environmental Services, D.P.C. (EDR), requesting additional information regarding the mapping of the historic alignment of watercourses within and adjacent to the Project. In correspondence dated May 21, 2021, EDR provided responses to comments and questions raised by the Onondaga Nation (enclosed).

The NYSDOT has reviewed and supports EDR's responses. We respectfully request that the FHWA forward a copy of this letter along with the enclosed correspondence from EDR dated May 21, 2021 and the attached Map 1: Historic Locations of Streams to the Onondaga Nation.

If you have any questions, or if the Onondaga Nation has any additional concerns regarding the mapping of the historic alignment of watercourses within and adjacent to the Project, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642. The NYSDOT would like to express its appreciation of the Onondaga Nation's continuing interest in this Project.

Sincerely,

Angelo Trichilo 6/18/2021

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

AT/cl/bb

Encl: Memo from Patrick Heaton and Matthew Victor Weiss, EDR to NYSDOT, May 21, 2021

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

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memorandum

To: Ms. Jessica Prockup
New York State Department of Transportation
Office of Environment
Sent via email to: Jessica.Prockup@dot.ny.gov

EDR Project No: 13051

From: Patrick Heaton, RPA; Matthew Victor Weiss, RPA
Environmental Design & Research (EDR)

Date: May 21, 2021

Reference: I-81 Viaduct Project
City of Syracuse and Towns of Cicero, Dewitt, and Onondaga, Onondaga County, New York
PIN 3501.60
SHPO Project Review # 16PR06314
Continuing Nation-to-Nation Consultation: Meeting April 14, 2021 – Response to Comments

Introduction

On behalf of the New York State Department of Transportation (NYSDOT), Environmental Design & Research (EDR) has prepared this memorandum to respond to a request for additional detail from the Onondaga Nation regarding the historic alignment of watercourses within and adjacent to the I-81 Viaduct Project (the Project), in Onondaga County, New York. The Onondaga Nation presented this request during a Nation-to-Nation meeting with the Federal Highway Administration (FHWA) on April 14, 2021, as part of ongoing consultation for the development of a proposed Programmatic Agreement to advance the Section 106 process for the Project.

EDR previously prepared a memorandum/report (March 4, 2021), which included digital mapping of the historic alignment of watercourses within and adjacent to the Project's Area of Potential Effects for Direct Effects (hereafter, the "APE for Direct Effects"), as well as enclosed digital and hard copies of historic maps depicting historic stream alignments. This memorandum and enclosed mapping were provided to the Onondaga Nation on March 5, 2021. That report is referenced herein.

During the April 14, 2021 meeting, the FHWA recorded four comments or questions from the Onondaga Nation regarding the historic mapping of streams, specifically Mud Creek and Butternut Creek, and its implication on the archaeological sensitivity of the APE for Direct Effects. Responses to these comments include the following:

Comment 1: The Onondaga Nation asked that quarter-mile buffers be added around the historic alignment of watercourses depicted on the "1940s" mapping to identify areas that may be archaeologically sensitive.

> Response 1: EDR has updated the historic stream alignment mapping previously provided to the Onondaga Nation on March 5, 2021 in the aforementioned memorandum. This updated mapping is attached (see

attached Map 1) and delineates a quarter-mile buffer around the historic alignment of the following watercourses depicted on U.S. Geological Survey (USGS) topographic quadrangles dating from 1938 to 1943:

- Butternut Creek and its tributaries (I-481 Eastern Improvements – North and South),
- Tributaries of Mud Creek (I-81/I-481 Northern Interchange),
- Onondaga Creek (Central Study Area) and its tributaries (I-81/I-481 Southern Interchange),
- Ley (formerly Mud) Creek (Central Study Area) and its tributaries (I-481 Eastern Improvements – North),
- Beartrap Creek (I-81 North of the Central Study Area).

The attached mapping also highlights the portions of the APE for Direct Effects which fall within these buffers.

Comment 2: The Onondaga Nation commented that the Project's previous archaeological reports stated that the portion of the APE for Direct Effects along I-481 was not archaeologically sensitive.

Response 2: The *Phase IA Archaeological Sensitivity Assessment* (EDR, 2016; the "Phase IA Report") stated that in the absence of documented earth disturbance, the I-81/I-481 Southern Interchange possesses moderate to high sensitivity for Native American archaeological resources, due to the proximity of Onondaga Creek, while the I-81/I-481 Northern Interchange and I-481 Eastern Improvements area possess moderate sensitivity for Native American archaeological resources, due to the proximity of Cicero Swamp and Butternut Creek, respectively (EDR, 2016:160-161, 163). Based on this sensitivity, the *Phase IB Archaeological Survey Work Plan* (EDR, 2017; the "Phase IB Work Plan"), recommended shovel testing across those portions of the I-81/I-481 Northern and Southern Interchanges and I-481 Eastern Improvements area that were unpaved and where extensive previous disturbance was not documented or could not be readily determined, or where the depth of fill deposits, if present, would be unlikely to exceed the practical limits of hand excavation (EDR, 2017:12, Figure 5: Sheets 1 and 2). Machine-aided archaeological testing and archaeological monitoring during construction were not recommended along I-481 due to substantial previous disturbance resulting from interstate highway construction (EDR, 2017: Figure 2: Sheets 1 and 2). Those areas not located on "Cut-and-Fill Highway and Embankment Areas" (areas severely disturbed to such an extent that there is no potential for intact archaeological resources to be present [EDR, 2017:9]) were submitted to shovel testing, as described in the following paragraph.

The results of this shovel testing is reported on in the *Phase IB Archaeological Survey* report (EDR, 2020, the "Phase IB Report"), as are results of shovel testing for areas added to the APE for Direct Effects subsequent to the Phase IB Work Plan (EDR, 2017). These areas were assessed for previous disturbance and archaeological sensitivity following the previously established methodology for the Project, developed and described in the Phase IA Report (EDR, 2016) and the Phase IB Work Plan (EDR, 2017) (EDR, 2020:7, 12-13). Based on this methodology, EDR excavated 437 shovel tests in eight areas within the I-81/I-481 Northern Interchange, I-481 Eastern Improvements area, the I-81/I-481 Southern Interchange, and the Central Study Area that appeared to be potentially undisturbed and were considered to be sensitive for Native American archaeological resources and human burials due to the proximity of the historic alignments of unnamed tributaries of Mud Creek and Butternut Creek, respectively. No Native American archaeological resources were identified during shovel testing of these areas, or anywhere throughout the APE for Direct Effects.

Comment 3: The Onondaga Nation asked that the historic alignment of watercourses be overlaid with the APE for Direct Effects in mapping.

Response 3: Historic maps and/or data digitized from historic maps have been included in all of the archaeological reports prepared for the Project, including the Phase IA Report (EDR, 2016), and considered as part of archaeological evaluations conducted to date. Based on review of a draft of the Phase IA Report (EDR, 2016), the Onondaga Nation requested that the historic alignment of Onondaga Creek be more clearly delineated. The Onondaga Nation noted that all areas along the historic alignment of Onondaga Creek, and any other areas near historic watercourses/bodies, should be considered sensitive for potential human burials. To address these concerns, the mapped extent and path of all watercourses within and adjacent to the APE for Direct Effects were digitized and included in Figure 4: Sheets 1 and 2 within the Phase IB Work Plan (EDR, 2017). This map was also provided to the Onondaga Nation on March 5, 2021 as an attachment to a memorandum addressing the historic mapping of streams within and adjacent to the APE for Direct Effects. The digitized watercourses, maps used for digitization, and the methodology employed for digitizing watercourses was provided in this memorandum, as well as originally in the Phase IB Work Plan (EDR, 2017:8, Figure 4; Sheets 1 and 2). Subsequent to the Phase IB Work Plan (EDR, 2017), the Project's design continued to progress and additional areas for potential construction activities were defined along I-481, referred to herein as the I-481 Eastern Improvements. Additional GIS mapping of the historic alignments of watercourses within and adjacent to the portions of the APE for Direct Effects within the I-481 Eastern Improvements area was completed (consistent with the methodology described in the Phase IB Work Plan [EDR, 2017]) to identify areas of potential archaeological sensitivity. This mapping was provided to the Onondaga Nation on March 5, 2021 and is included herein as an attachment. The attached mapping includes digitized historic watercourse alignments that are proximate to all portions of the APE for Direct Effects. See the bulleted list in Response 1 above for a list of streams and their locations whose historic alignments intersect with, or are located within a quarter-mile of, the APE for Direct Effects.

Comment 4: The Onondaga Nation stated that after the historic alignment of watercourses is overlaid with the APE for Direct Effects in mapping, the Phase IB Work Plan (EDR, 2017) would need to be revised and agreed upon by the Onondaga Nation. The Onondaga Nation also asked that the Phase IB Work Plan (EDR, 2017) change "would/should" language to "will/shall."

Response 4: The historic alignment of watercourses within and adjacent to the APE for Direct Effects were digitized and included in the Phase IB Work Plan (EDR, 2017: Figure 4: Sheets 1 and 2) and were considered when developing archaeological testing strategies. Consideration of historic stream mapping as it relates to archaeological sensitivity has occurred concurrently throughout the design of the Project (i.e., changes to the APE for Direct Effects since 2017). Based on this mapping, machine-aided testing specifically targeting the historic alignment of Onondaga Creek, which, as previously noted is sensitive for human burials, Pre-Contact Native American cultural material, and historic-period structures, has been recommended. These GIS analyses also informed the shovel testing fieldwork conducted in areas located near existing and historically documented watercourses, which is described in the Phase IB Report (EDR, 2020). All areas suitable for shovel testing throughout the APE for Direct Effects, including areas proximate to the historic alignment of watercourses, have already been tested and reported on in the Phase IB Report (EDR, 2020). Shovel testing

has been conducted within portions of the APE for Direct Effects proximate to Butternut Creek throughout the I-481 Eastern Improvements area and proximate to unnamed tributaries of Mud Creek in the I-81/I-481 Northern Interchange, the results of which are described in the Phase IB Report (EDR, 2020). No Native American archaeological resources were identified during shovel testing of these areas, or anywhere throughout the APE for Direct Effects. No additional areas suitable for machine-aided archaeological testing or archaeological monitoring during construction were identified as a result of the shovel testing effort due to substantial previous disturbance (i.e., cut-and-filled terrain, ditches, "Cut-and-Fill Highway and Embankment Areas," etc.) and existing wetlands. However, one additional area suitable for machine-aided archaeological testing along West Bear Street was identified within the Central Study Area along the historic alignment of Onondaga Creek (EDR, 2020:41, Map 1: Sheet 72).

NYSDOT anticipates providing more detail concerning the proposed locations for machine-aided excavation prior to the initiation of construction. Those areas will be selected based on the sensitivity of areas as identified by the Onondaga Nation, the archaeological sensitivity assessment included in the Phase IA Report (EDR, 2016), evaluation of prior ground disturbance, and the proposed construction activities.

The Phase IB Work Plan (EDR, 2017) describes methodologies, procedures, and protocols for upcoming archaeological investigations, including machine-aided excavation and monitoring during construction. In this context, the words "would" and "should" occur in relation to possible future situations that may or may not occur in association with the project scope or design details, and possible events such as potential archaeological finds or inadvertent discoveries. This language offers a degree of flexibility to accommodate as yet unknown factors during implementation of established methodologies for archaeological investigations. For example, the Phase IB Work Plan states: "Changes to Project plans prior to or during construction would impact the APE which would necessarily impact the Phase IB archaeological survey and construction monitoring work plan" (EDR, 2017:2). In the description of construction monitoring, the Phase IB Work Plan states that "The timeframe outlined above would not apply in the case of a human remains discovery" (EDR, 2017:21). Statements such as these are not meant to be equivocal, but to clearly distinguish between what is known and what is not yet known at this time, consistent with the reason for the development of a Programmatic Agreement.

As a binding legal document, an executed Programmatic Agreement is a record of commitments to carry out measures developed during Section 106 consultation for the Project, using the words "will" and "shall" to indicate obligations for future action. For example, the opening statement under Stipulations in the Advisory Council on Historic Preservation (ACHP) model Memorandum of Agreement (MOA) / Programmatic Agreement (PA) template states: "[Agency abbreviation] shall ensure that the following measures are carried out." Therefore, the commitment for archaeological investigations is expressed in the "will / shall" language of the Programmatic Agreement, with the Phase IB Work Plan incorporated by reference in the stipulations and as an appendix to the Agreement document.

If you have any questions/concerns, please contact Patrick Heaton, RPA at pheaton@edrdpc.com, or Matthew Victor Weiss, RPA at mweiss@edrdpc.com, or (315) 471-0688.

Attachments:

- Map 1. Historic Locations of Streams

References Cited:

Environmental Design & Research, Landscape Architecture, Engineering, and Environmental Services, D.P.C. (EDR). 2016. *Phase 1A Archaeological Sensitivity Assessment: I-81 Viaduct Project, City of Syracuse and Towns of Salina, Cicero, and Dewitt, Onondaga County, New York, 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, 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. 2020. *Phase IB Archaeological Survey: Shovel Testing (Revised): I-81 Viaduct Project, City of Syracuse and Towns of Salina, Cicero, and Dewitt, Onondaga County, New York, 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.

Per consultation with the Onondaga Nation, all areas along the historic alignment of Onondaga Creek and any additional areas near the natural/original course of waterbodies within the APE should be considered sensitive for the potential to contain human burials. To address these concerns, the mapped extent and path of watercourses within the APE for Direct Effects were digitized and included in GIS mapping for the project. Historic maps from 1827, 1834, 1852, 1859, 1874, and 1938-1943 were digitally georeferenced using GIS software. All watercourses depicted on those maps within or immediately adjacent to the APE were traced, and buffered by 50 feet (15 meters) to account for uncertainty in the original cartographic depiction of watercourses and/or potential geo-referencing errors. Areas adjacent to the mapped former locations of these waterbodies represent areas that are considered archaeologically sensitive due to potential for buried human remains.

Historic Course of Ley (formerly Mud) Creek

Historic Course of Harbor Brook

Historic Course of Onondaga Creek

Central Study Area

I-81 Viaduct Project

Onondaga County, New York

Map 1: Historic Locations of Streams
Sheet 1: Central Study Area

May 2021

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" Map Service.
2. This is a color graphic. Reproduction in grayscale may misrepresent the data.
3. This map presents information originally presented in Figure 4 of the Phase IB Work Plan (EDR, 2017).

- APE for Direct Effects

Map Documented

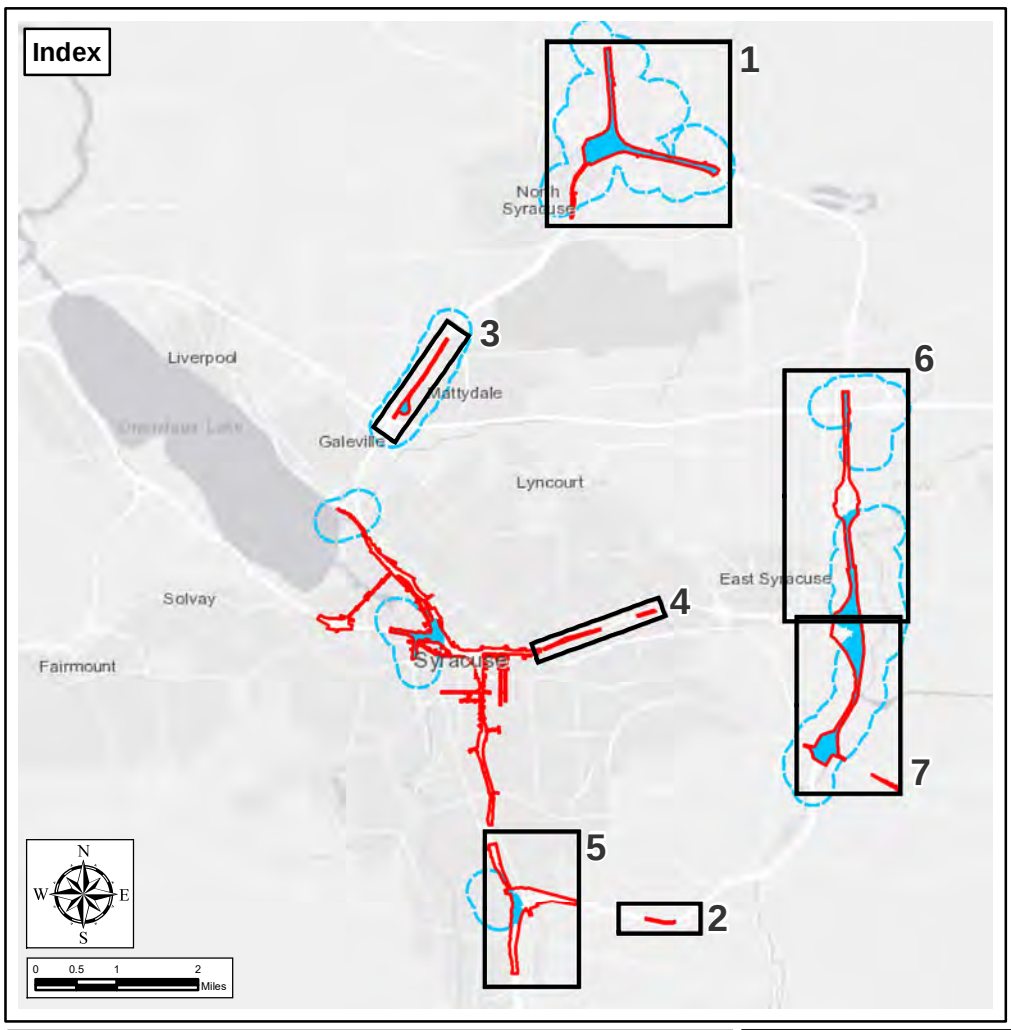
- 1827 Kellogg Map of a Part of the Onondaga Salt Springs Reservation
- 1834 Leavenworth & Clarke Map of the Village of Syracuse and the Village of Lodi
- 1852 Fagan Map of Onondaga County, New York
- 1859 French Map of Onondaga County, New York
- 1874 Sweet New Atlas of Onondaga Co., New York
- 1938-1943 USGS Topographic Quadrangles
- Quarter-Mile Buffer of 1938-1943 Watercourses
- Portions of APE for Direct Effects within Quarter-Mile Buffer

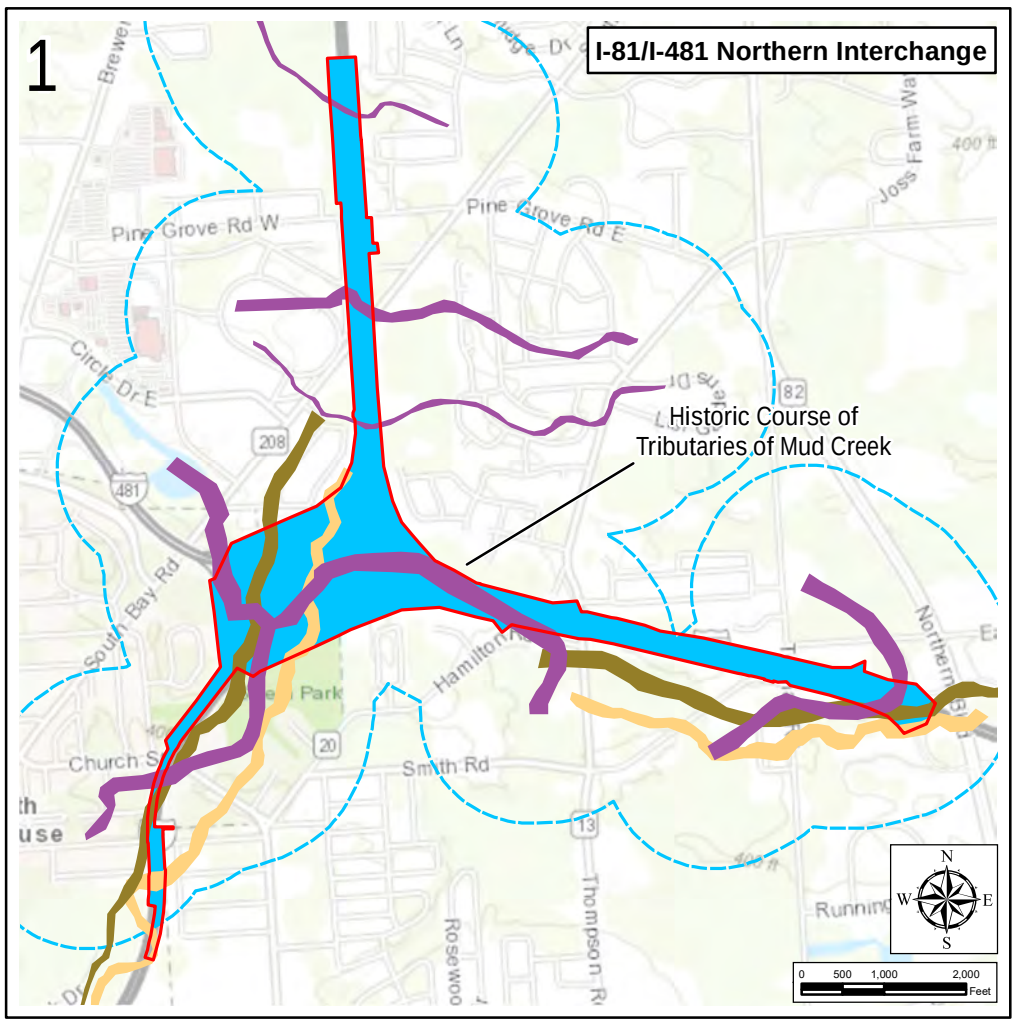
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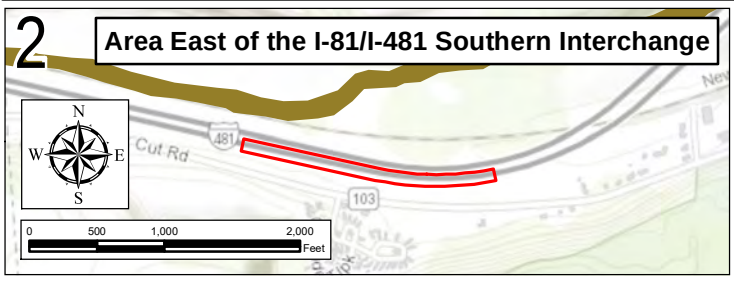
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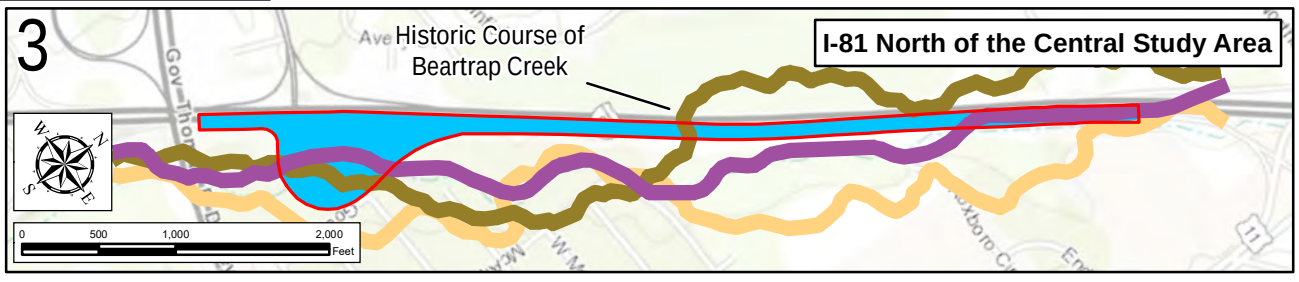
NEW YORK STATE OF OPPORTUNITY. Department of Transportation

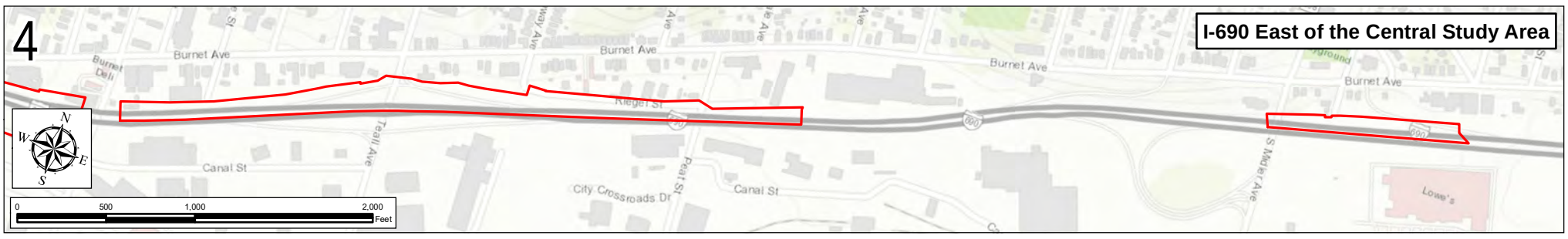
U.S.Department of Transportation
Federal Highway Administration

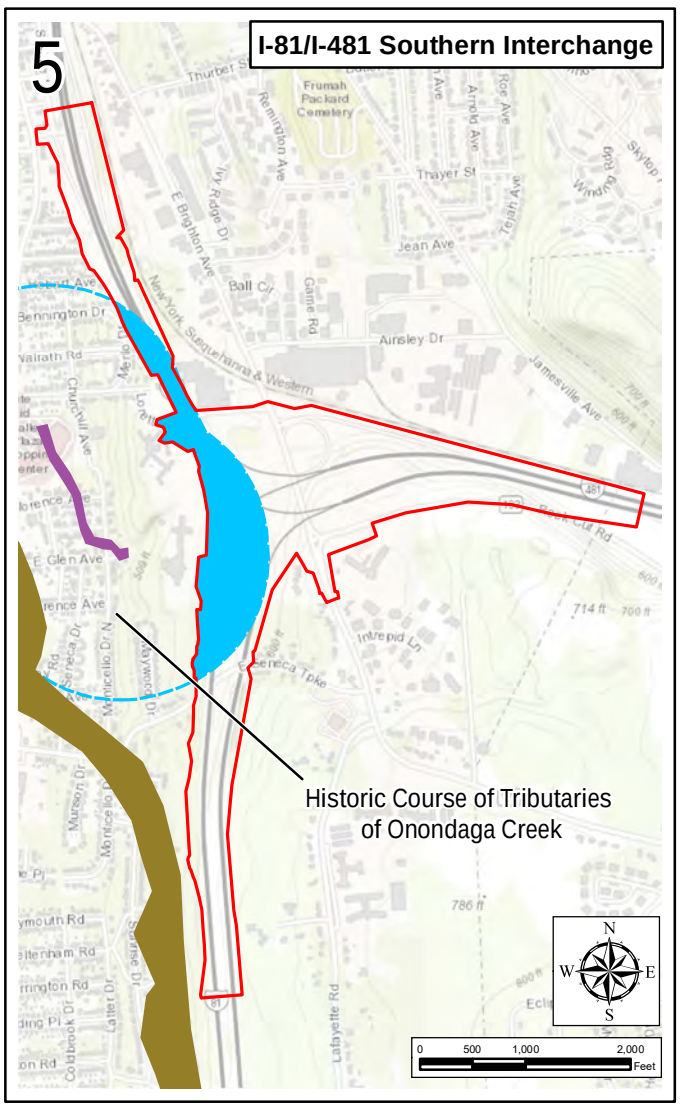


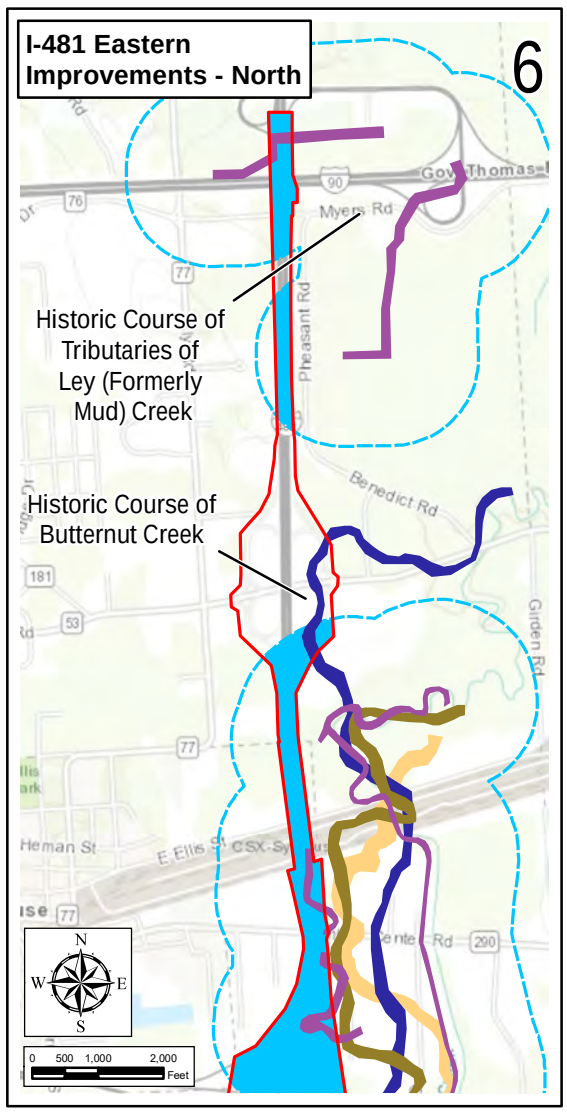


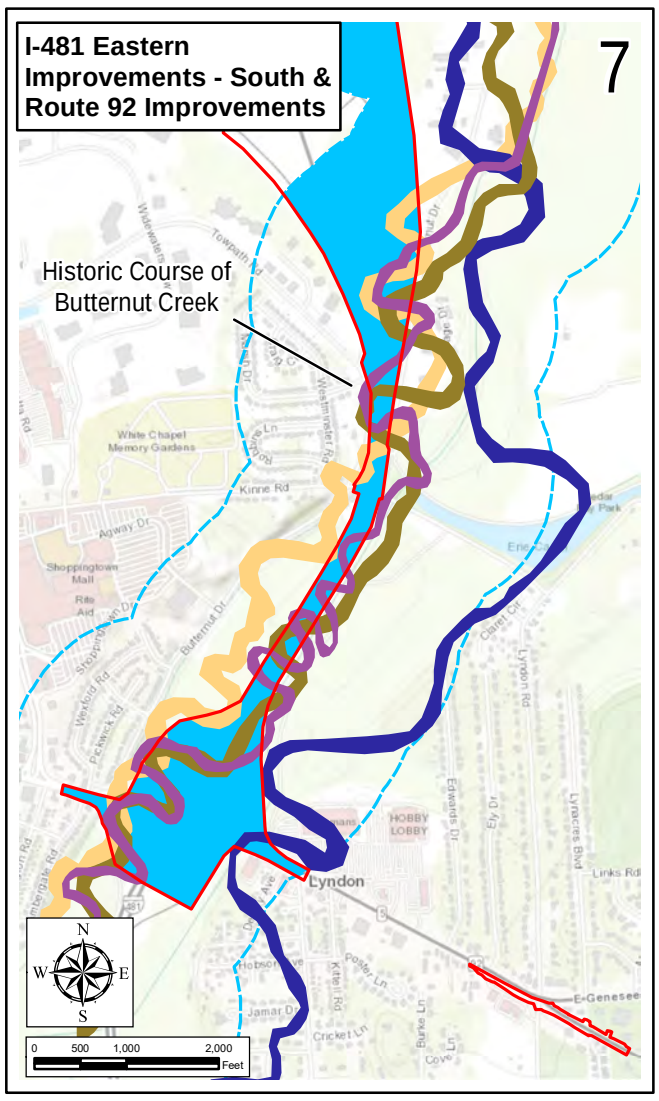












I-81 Viaduct Project

Onondaga County, New York

Map 1: Historic Locations of Streams
Sheet 2: Additional Areas

May 2021

Notes: 1. Basemap: ESRI ArcGIS Online "World Topographic Map" Map Service.
2. This is a color graphic. Reproduction in grayscale may misrepresent the data.
3. This map presents information originally presented in Figure 4 of the Phase IB Work Plan (EDR, 2017).

- APE for Direct Effects

Map Documented Watercourses

- 1827 Kellogg Map of a Part of the Onondaga Salt Springs Reservation
- 1834 Leavenworth & Clarke Map of the Village of Syracuse and the Village of Lodi
- 1852 Fagan Map of Onondaga County, New York
- 1859 French Map of Onondaga County, New York
- 1874 Sweet New Atlas of Onondaga Co., New York
- 1938-1943 USGS Topographic Quadrangles
- Quarter-Mile Buffer of 1938-1943 Watercourses
- Portions of APE for Direct Effects within Quarter-Mile Buffer

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

U.S.Department of Transportation
Federal Highway Administration

NEW YORK STATE OF OPPORTUNITY. | Parks, Recreation, and Historic Preservation

ANDREW M. CUOMO
Governor

ERIK KULLESEID
Commissioner

June 21, 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
City of Syracuse, Onondaga County, NY16PR06314
PIN 3501.60

Dear Mr. Trichilo, PE:

Thank you for requesting the comments of the State Historic Preservation Office (SHPO). We have reviewed the May 28, 2021 *Section 106 Consulation:APE Refinement Cover Letter* and the May 2021 *EDR Memo Regarding Nosie Barrier 16A&B* in accordance with Section 106 of the National Historic Preservation Act of 1966.

Based upon the review, the SHPO concurs with the recommendation for no archaeological testing within the Area of Potential Effects (APE) for Noise Barrier 16A&B because of the presence of documented previous ground disturbance.

If you have any questions, I can be reached at nancy.herter@parks.ny.gov.

Sincerely,

Nancy Herter

Nancy Herter
Archaeology Unit Program Coordinator

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
NewYork.FHWA@dot.gov

June 21, 2021

In Reply Refer To:
HPD-NY

Alma Lowry, Esq.
Law Office of Joseph Heath
General Counsel to the Onondaga Nation
512 Jamesville Avenue
Syracuse, NY 13210-1502

Subject: PIN 3501.60 - Section 106 Consultation Response to Comments
Interstate 81 Viaduct Project
City of Syracuse, Onondaga County

Dear Ms. Lowry:

The Federal Highway Administration (FHWA) is transmitting a letter prepared by NYSDOT and its consultant, providing responses and clarifications to four questions and comments made by the Onondaga Nation during our April 14, 2021 Nation-to-Nation meeting regarding the subject project. Due to the nature of some comments, the provided response also includes figures depicting a revised project Area of Potential Effects.

If you have any questions, please feel free to contact me at (518) 431-8855.

Sincerely,

Jared A. Gross, P.E.
Area Engineer

Enclosures

cc: A. Gonyea, Onondaga Nation
T. Lee, Onondaga Nation
A. Trichilo, Deputy Chief Engineer, Office of Environment, NYSDOT
J. Prockup, Office of Environment, NYSDOT
M. Frechette, Project Director, NYSDOT, Region 3
N. Herter, Archaeology Unit Program Coordinator, NYSHPO
M. Ranslow, ACHP
R. Davies, FHWA, HPD-NY
M. Toni, FHWA, HEA-NY
D. Clarke, FHWA, HEPE

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

July 26, 2021

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: 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:

This correspondence serves to notify the Federal Highway Administration (FHWA) of a change in the designated representative for the American Institute of Architects Central New York (AIA CNY) Chapter, a previously approved Section 106 Consulting Party member for the Interstate 81 (I-81) Viaduct Project.

Enclosed, please find correspondence from the AIA CNY, dated July 15, 2021, which names Mr. Robert Haley as their new designated representative.

If you have any questions, please feel free to contact Jessica Prockup at 518-417-6642, or via email at Jessica.Prockup@dot.ny.gov.

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/bb
Encl: AIA CNY Correspondence: Section 106 Consulting Party Representative, July 15, 2021

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

AIA Central New York

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

July 15, 2021

RE: FHWA/NYSDOT
Interstate 81-Viaduct Project/PIN 3501.60
Section 106 Process / Consulting Party Comments

Dear Ms. Prockup,

The American Institute of Architects Central New York Chapter is a previously appointed official Consulting Party in accordance with Section 106 of the National Historic Preservation Act of 1966. Per your email on June 17 requesting that we designate a new representative to participate In the Section 106 process on our behalf, we would like to name Mr. Robert Haley as our new representative.

ROBERT HALEY ARCHITECT AIA LEED AP
Sustainable Planning, Architecture & Urban Design
137 Buckingham Ave., Syracuse, New York 13210
rhaleyArch@gmail.com Cell 315-679-1009

Please notify the Federal Highway Administration of the change in the designated representative for AIA Central New York. If there are others working with you on this effort, please extend this update to them as well.

Sincerely,

Nicolette R. Havrish, AIA, President
AIA Central New York

cc: Robert Haley, AIA, LEED AP
Stephanie Wright, AIA, Secretary, AIA Central New York

AIA Central New York Chapter
351 S. Warren St, Suite 200
Syracuse, NY 13202

Phone (315) 475-8563
Fax (315) 475-8563
www.aia.org/centralnewyork

LAW OFFICE OF JOSEPH J. HEATH
GENERAL COUNSEL FOR THE ONONDAGA NATION
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315-447-4851
Facsimile
315-475-2465

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

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

LAW OFFICE OF JOSEPH J. HEATH
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315-475-2465

March 17, 2020

Daniel Hitt
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. Hitt:

In a November 8, 2019 letter, the Onondaga Nation made several requests related to the cultural resource investigation and monitoring for the I-81 project. Specifically, the Nation raised concerns about the archaeological sensitivity determinations within the project area and asked that the Nation be directly involved in monitoring active construction areas and/or training construction workers and on-site supervisors to monitor active construction sites on their own. Your response was that the New York State Department of Transportation would take the request under advisement. Since no decision has been made, we are taking this opportunity to supplement the request for cultural monitors and/or worker training.

As indicated in our earlier letter, the Nation requests that a Cultural Resource Monitor (CRM) chosen or approved by the Nation be present at all active construction locations and that, to the extent possible, a supervising archaeologist chosen or approved by the Nation be available to consult with those monitors and to respond to any inadvertent discoveries of cultural resources or human remains during the I-81 construction period. Because this will provide value to a project being undertaken in a sensitive area, the cost of CRMs and an archaeologist, if needed, should be borne by the project applicant and incorporated into the project budget.

CRMs are certainly warranted whenever construction will occur in areas designated as sensitive, but the Nation firmly believes that such monitors are also valuable in "non-sensitive" or previously disturbed areas for this project. In our experience, any ground disturbing activities within the traditional Onondaga territory have the potential to disturb cultural artifacts or burial sites. Within the past 18 months alone, human remains were discovered at two sites undergoing

construction that were designated non-sensitive. In both cases, the remains were fairly obvious and difficult to overlook. That may not be the case for the I-81 project.

The Nation's concern about potential disruption of cultural artifacts from the I-81 project stems from two primary issues. First, the areas around Onondaga Lake and the original configuration of Onondaga Creek were central to the Onondaga Nation from time immemorial. Over time, many villages, fishing and hunting camps, and primary travel routes would have been established in this area and cultural artifacts and burial sites associated with those uses are extremely likely to have been present. Second, as documented in your own archaeological surveys, 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. Further, these cultural artifacts may have been scattered during this process, meaning that they may be in smaller bits or isolated and therefore easily overlooked or not recognized as cultural artifacts by untrained workers.

Dedicated CRMs will be more likely to observe and properly identify scattered or isolated artifacts both because they will be focused exclusively on this task and will have the necessary experience and/or training to recognize a range of CRMs employed on active construction sites have extensive training – at minimum, a bachelor's degree in a relevant subject and specialized field training – or many years of experience. The typical construction worker on the I-81 project would not meet those standards. The Nation can provide CRMs that do.

Anthony Gonyea, for example, has almost 25 years of field experience. In addition to his extensive familiarity with cultural artifacts and human remains as they present in the field, he has learned to recognize indicators of potentially sensitive areas, such as soil striations associated with potential burial sites and soil coloration that may indicate campfires associated with hunting or fishing villages. Tiffany Lee, a Nation citizen, will soon finish a doctorate in archaeology with specialized training in the identification and excavation of human remains. Additionally, she has previous experience as a CRM for construction sites. Several Nation citizens who could be tapped as monitors hold bachelor's degrees in archaeology, anthropology, museum studies, or related subjects. Coupled with their grounded knowledge of Onondaga culture, these Nation citizens are uniquely qualified to identify cultural artifacts within the construction areas.

Dedicated CRMs would be tasked with the following: observing open construction areas for cultural artifacts, human remains, or "sensitive area" indicators; examining questionable items uncovered by construction to determine if they constitute artifacts or remains; and, in consultation with the Nation-chosen archaeologist, supervising the excavation or appropriate handling of any artifacts or remains uncovered during construction. Based on rates on other projects, acceptable hourly rates for Nation CRMs would range from approximately $18 to $52 per hour depending on training and experience and travel expenses based on standard mileage rates, as needed. A detailed proposal for the positions, qualifications, salary requirements, and associated tasks for Nation staff sis included with this letter as Attachment 1.

For the I-81 project specifically, the Nation would propose using staff at the Junior-Level Archaeologist/CRM II, Senior-Level Archaeologist/Senior CRM, and Lead Archaeologist/CRM Coordinator level. Tony Gonyea, whose extensive field experience qualifies him as a Senior CRM, would focus on the most sensitive sites and be compensated at an hourly rate of $40.40. Due to the higher probability of finding human remains, Tiffany Lee would monitor project areas considered most sensitive and be compensated at an hourly rate of $52.50. At least three additional Nation citizens, based on undergraduate training and direct experience, qualify for CRM II positions. They would focus on areas expected to be less sensitive or work with Mr. Gonyea to monitor particularly large sites with more than one area of active ground disturbance. Their pay rate would be $23.23 per hour.

For all the reasons above, the Nation strongly prefers having its own paid monitors at open construction sites given their greater cultural competence. However, if there are many areas under construction at the same time, Nation monitors may not be available for all sites. For that reason, training of construction workers by Nation-designated or approved staff should also be required to ensure that project staff working on unmonitored sites recognize artifacts and know the appropriate procedure. 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.

Based on their years of experience, advanced training, and cultural knowledge, Onondaga Nation representatives such as Tony Gonyea and Tiffany Lee are best qualified to conduct this training. As with the monitoring services, trainers provided by the Nation are providing a benefit to the project and should be compensated using project funds. Hourly rates for trainers would range from $50 to $75, since trainers must have both the extensive training and/or field experience required for senior field staff and the additional skills necessary to design and deliver classroom and field instruction on the identification and proper handling of cultural resources.

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

Attachment 1: Archaeology Consultant/Cultural Resource Monitor
Position Descriptions and Salary Requirements
Onondaga Nation Historic Preservation Office

Lead Archaeologist/Cultural Resource Monitor Coordinator (Ex: Tiffany Lee - Senior Bioarchaeologist)

Experience/Training: Terminal degree (PhD) in relevant field; significant field experience

Salary Requirements: starting at $52.52/hour ($109,240 annually) plus per diem as needed

Tasks:

- Act as Onondaga Nation Lead Archaeological Consultant
- Review archaeological site survey reports to assess site sensitivity
- Serve as Human Remains Specialist: identification, excavation, repatriation
- Identify faunal remains
- Serve as Site Construction Consultant on excavation methods
- Act as Site Supervisor for projects with multiple Cultural Resource Monitors
- Assess cultural materials discovered on site
- Monitor construction at sensitive sites or sites with probable effects on cultural deposits
- Complete monitoring forms as needed: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Act as Lead Field Trainer for Cultural Resource Monitor I and II
- Catalog cultural materials

Senior-level Archaeologist/Senior Cultural Resource Monitor (Ex: Tony Gonyea - Regional Cultural Specialist)

Experience/Training: M.A./M.S. in relevant field **OR** 10+ years' field experience

Salary Requirements: starting at $40.40/hour ($84,040 annually) plus per diem as needed

Tasks:

- Act as Section 106 and NAGPRA Nation Representative
- Conduct site sensitivity assessment
- Serve as Site Construction Consultant on excavation methods
- Act as Site Supervisor for projects with multiple Cultural Resource Monitors
- Assess cultural materials discovered on site
- Monitor construction at sensitive sites or sites with probable effects on cultural deposits
- Complete monitoring forms as needed: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Identify archaeological features and cultural materials
- Act as Lead Field Trainer for Cultural Resource Monitor I and II
- Report to Lead Archaeologist upon inadvertent discovery of human remains

Mid-Level Archaeologist/Cultural Resource Monitor III

Experience/Training: B.A./B.S. in relevant field; 5+ years' experience

Salary Requirements: starting at 30.22/hour ($62,860 annually) plus per diem as needed

Tasks:

- Report to Regional Cultural Specialist or Lead Archaeologist
- Act as Site Supervisor
- Monitor construction on sites with potential effects on cultural deposits
- Complete monitoring forms: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Identify archaeological features and cultural materials
- Report to Lead Archaeologist upon inadvertent discovery of human remains

Junior-Level Archaeologist/Cultural Resource Monitor II

Experience/Training: B.A./B.S. in relevant field; limited experience

Salary requirements: starting at $23.14/hour ($48,130 annually) plus per diem as needed

Tasks:

- Report to Site Supervisor
- Monitor construction on sites with potential effects on cultural deposits
- Complete monitoring forms: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Identify archaeological features and cultural material
- Engage in ongoing field training
- Report to Lead Archaeologist upon inadvertent discovery of human remains

Entry Level Archaeologist/Cultural Resource Monitor I

Experience/Training: B.A./B.S. in relevant field; no experience

Salary Requirements: starting at $18.25/hour ($37,970 annually) plus per diem as needed

Tasks:

- Report to and assist senior cultural monitor on-site (Cultural Resource Monitor II or III; Senior Cultural Resource Monitor; or Cultural Resource Monitor Coordinator)
- Engage in on-going field training
- Monitor construction sites considered "Low probability of cultural effects"
- Complete monitoring forms: Profile Map of Stratigraphic Layers, Photographs of Surface and Stratigraphic Profile, Soil Descriptions, Log Daily Activities
- Report to Lead Archaeologist inadvertent discovery of human remains

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

ANDREW M. CUOMO
Governor

MARIE THERESE DOMINGUEZ
Commissioner

August 19, 2021

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: RESPONSES TO CONSULTING PARTY COMMENTS RECEIVED***
PIN 3501.60 (OPRHP 16PR06314)
Interstate 81 (I-81) Viaduct Project
City of Syracuse, Onondaga County, New York

Dear Mr. Gross:

The New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), held a virtual meeting with Consulting Parties in the Section 106 process for the Interstate 81 (I-81) Viaduct Project (the Project) on March 31, 2021. The purpose of the meeting was to engage Consulting Parties in the development of a Programmatic Agreement (PA) to move forward with the Section 106 process for the Project. During the meeting, Consulting Party members made comments related to the following:

- Reconsideration of the National Register eligibility for Pioneer Homes
- Mitigation for past effects on Oakwood Cemetery entrance

The NYSDOT has considered the comments received and offers the responses below for consideration by the FHWA.

History of Section 106 Consultation for Pioneer Homes
During the March 31, 2021 meeting, Consulting Party members reiterated previous requests to reevaluate Pioneer Homes for National Register eligibility, expressing their belief that Pioneer Homes had been previously determined eligible for the National Register and citing examples from other states where public housing districts have been determined eligible.

In response, the NYSDOT offers the following chronological summary of Section 106 consultation regarding the National Register eligibility of Pioneer Homes:

- Correspondence from the NYSDOT to the New York State Historic Preservation Office (SHPO) (November 21, 2016); Requesting Concurrence on National Register Eligibility Determinations (Enclosure 1)

  In this letter, the NYSDOT seeks SHPO concurrence with the evaluation of National Register eligibility for several properties within the area of potential effects for the Project, including Pioneer Homes. The NYSDOT recommended that Pioneer Homes be determined National Register-eligible as a historic district representing a planned community under National Register Criterion A in the area of Community Planning and

Development and under Criterion C for Design. As described in the Historic Resource Inventory enclosed with the letter, the assemblage of multi-family buildings represents 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, it was recommended that 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.

- Correspondence from SHPO to NYSDOT (December 7, 2016); Response to Eligibility Determinations (Enclosure 2)

  Based on review of the materials submitted by the NYSDOT, the SHPO assigned Unique Site Number (USN) 06740.014017 to Pioneer Homes, created a record for this Building District in the Cultural Resource Information System (CRIS), and determined that the property is Not Eligible for the National Register. In a Resource Evaluation dated December 7, 2016, the SHPO cited the loss of "significant elements of the symmetrical site plan" of the complex and identified the "alteration of some key character-defining architectural elements of the property" as integrity issues that disqualify Pioneer Homes for National Register eligibility or listing in the Multiple Property Document prepared by the National Park Service, called "Public Housing in the United States."

- Consulting Parties Meeting (August 12, 2019); Discussion of Project Effects on Known Historic Properties

  The NYSDOT, in coordination with the FHWA, held a meeting to invite and consider the views of Consulting Parties on the assessment of the Project's 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 *Finding Documentation*, prepared in accordance with the standards specified in 36 CFR §800.11(e), included a description of steps taken to identify historic properties.

- Correspondence from Consulting Parties to NYSDOT; Responses to draft *Finding Documentation* (Enclosure 3)

  - Cynthia Carrington Carter, Preservation Association of Central New York to NYSDOT (September 11, 2019)
  - Kate Auwaerter, City of Syracuse to NYSDOT (September 12, 2019)
  - Dean Biancavilla, The American Institute of Architects Central New York to NYSDOT (September 12, 2019)

  These letters discuss the eligibility determination for the Pioneer Homes, expressing the opinion of several Consulting Parties that the Pioneer Homes warrants reconsideration as a historic property eligible for inclusion in the National Register of Historic Places. The letters express their opinion that Pioneer Homes retains sufficient integrity of site and design to be eligible for the National Register under Criteria A and C.

- Correspondence from the NYSDOT to SHPO (December 3, 2019); Request reconsideration of the eligibility of Pioneer Homes for the National Register (Enclosure 4, with associated attachments included as Enclosure 3)

In this letter, the NYSDOT requested comments from the SHPO regarding the merit of reconsidering the eligibility of Pioneer Homes for inclusion in the National Register to ensure that the views of Section 106 Consulting Parties were given due consideration.

- Correspondence from the SHPO to NYSDOT (February 24, 2020); Eligibility Determination for Pioneer Homes (Enclosure 5)

  This letter affirmed the opinion that Pioneer Homes is not National Register-eligible due to a loss of integrity.

The NYSDOT recommends that the above-referenced correspondence and associated documentation, also provided in Appendix C, Correspondence of the *Finding Documentation* (April 2021), represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes, in consultation with the SHPO. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT will provide the Consulting Parties a copy of the *Finding Documentation* (April 2021) as part of a Section 106 consultation package.

Oakwood Cemetery Entrance:
During the March 31, 2021 meeting, several Consulting Party members commented that the Project, as currently designed, does not mitigate for impacts that resulted from the original construction of I-81 in the early 1960s and requested that the Project incorporate design elements to facilitate the re-opening of the original main entrance, such as lowering I-81 to be at-grade and reestablishing access to the former entrance.

In response, the NYSDOT offers the below historical context and summary of design options considered in the vicinity of the former entrance to Oakwood Cemetery.

Oakwood Cemetery, located at 940 Comstock Avenue, encompasses approximately 160 acres of landscaped terrain and eight miles of circulating roadways with cobble-lined gutters. Originally designed by Howard Daniels, the Oakwood Cemetery is characterized by 86 contributing elements, including 4 buildings, 1 site (rural landscape design), 21 structures (vaults and mausoleums), and 60 objects (statuary and sculptures). The National Register listed property incorporates the original cemetery designed in 1859 and subsequent additions, purchased between 1869 and 1889, and was substantially developed between 1871 and ca. 1940. Oakwood Cemetery was listed on the National Register of Historic Places under Criterion C for its landscape architecture, art, and funerary architecture (National Register number: 90NR03310) on May 9, 1991, well after the construction of I-81 and the subsequent relocation of the original main entrance. The Oakwood Cemetery National Register Nomination Form is attached for your reference (Enclosure 6).

The portion of I-81 that is located along the western edge of Oakwood Cemetery was constructed on an earthen embankment in the early 1960s. Construction of the earthen embankment required the closure of the original main entrance along Oakwood Avenue (former entrance) and led to the abandonment of the cemetery's original stone entrance gate, administration building, and main chapel. While the former entrance remains closed, an alternate access located on Colvin Street remains open and serves as the current entrance to the cemetery.

As currently proposed, the Project would retain the existing horizontal and vertical alignment of I-81 and no construction activities are planned along the section of I-81 adjacent to the Oakwood Cemetery. Oakwood Cemetery's current entrance on Colvin Street would be retained

and access to the entrance would be improved by the construction of a new Business Loop (BL) 81 northbound exit ramp to Colvin Street.

The FHWA, in coordination with the NYSDOT and in consultation with the SHPO, applied the Criteria of Adverse Effect (36 CFR §800.5(a)(1)) to National Register listed and eligible architectural properties within the APE for the Project, including Oakwood Cemetery. As documented in the Finding Documentation, the Project would not involve the temporary or permanent acquisition of land from Oakwood Cemetery, there would be no changes to or removals of any building/structure or other contributing features of Oakwood Cemetery, and the Project would not alter the character of the setting compared to existing conditions. As a result, mitigation would not be required or warranted.

In consideration of the comments received from Consulting Parties, the NYSDOT reviewed an at-grade intersection with BL 81 concept and a grade-separated crossing concept carrying BL 81 over a reconnected Oakwood Avenue to re-establish the former entrance to the Oakwood Cemetery, as described below.

<u>At-Grade Intersection</u>

The At-Grade Intersection option would lower the proposed BL 81 (existing I-81) to the grade of the existing street network from approximately East Colvin Street to approximately MLK Jr. East (formerly East Castle Street) in order to create an at-grade, signalized intersection with the former cemetery entrance. BL 81 would include three through-lanes in the north- and southbound directions at this location. Northbound BL 81 would also include an acceleration lane for drivers accessing BL 81 from East Colvin Street. Under this option, a connection to the former cemetery entrance would be reestablished through the reconnection of Oakwood Avenue. Oakwood Avenue is a two-lane local street with very low traffic volume. An evaluation of the At-Grade Intersection option identified the following safety, operational, and geometric concerns:

- As currently proposed, BL 81 would begin to transition from its existing vertical elevation at approximately 1300 feet south of MLK Jr. East before reaching the existing city street grid elevation at approximately MLK Jr. East. The At-Grade Intersection option would require the removal of the earthen embankment adjacent to Oakwood Cemetery and as such, would extend the transition approximately 1700 feet to the south to approximately East Colvin Street.

  The existing speed limit along I-81 in this location is 55 miles per hour (MPH). As currently proposed, the speed limit along BL 81 would transition to 40 MPH approximately 2000 ft south of MLK Jr. East and then to 30 MPH approximately 300 ft south of MLK Jr. East. The addition of a new signalized intersection along this stretch of BL 81 would require the speed to transition to 40 MPH at East Colvin Street, which is approximately 2800 ft south of MLK Jr. East. The speed limit would then transition to 30 MPH approximately 300 ft south of the new signalized intersection at the entrance to Oakwood Cemetery.

- In addition to the three-though travel lanes in each direction, the Project would also include the construction of an acceleration lane allowing travelers to access BL 81 northbound from East Colvin Street. Constructing a new at-grade signalized intersection on BL 81 at the former cemetery entrance would introduce safety concerns for motorists using this acceleration lane. A signalized intersection would violate drivers' expectations as motorists entering from East Colvin Street would be focused on accelerating to highway speeds and attempting to merge into adjacent lanes. A signal would be unsafe as it would interfere with the orderly movement of through and merging traffic.

- Safety of motorists traveling in the through lanes of BL 81 also would be impacted by construction of the signalized intersection. Signal activations would be infrequent given the very low volumes of vehicles entering and leaving the cemetery. As a result, motorists on BL 81 would typically observe a green signal indication. The occasional red indication for this major movement would be unexpected and would lead to high speed, rear end collisions.

- Private driveways would be prohibited along the entire length of BL 81.

- The New York Susquehanna and Western (NYS&W) Railroad, also constructed on an earthen embankment, is located between the existing I-81 and Oakwood Cemetery. Rail operation must be maintained in this location and the horizontal and vertical alignment of the railroad tracks cannot be altered. Removing the earthen embankment to lower I-81 to the grade of the existing street network may require the construction of retaining walls to retain the railroad's earthen embankment and to avoid impacting rail operations. The construction of retaining walls to support the railroads earthen embankment would likely cause impacts to the cemetery.

Grade-Separated Crossing

The Grade-Separated Crossing option would raise the vertical alignment of BL 81, from approximately 1000 feet north of East Colvin Street to approximately 1100 feet south of MLK Jr. East (adjacent to the cemetery's original entrance), to provide sufficient vertical clearance and allow for the extension and reconnection of Oakwood Avenue under BL 81. An evaluation of the Grade-Separated Crossing option identified the following safety, operational, and geometric concerns:

- As currently proposed, BL 81 would begin to transition from its existing vertical elevation at approximately 1300 ft. south of MLK Jr. East before reaching the existing city street grid elevation at approximately MLK Jr. East. The Grade-Separated Crossing option would raise the vertical profile of BL 81 adjacent to Oakwood Cemetery and as such, extend the transition 1100 feet to the south to approximately 1000 ft north of East Colvin Street.

- Raising the vertical profile of BL 81 at this location would require construction of retaining walls to retain the roadway's earthen embankment and minimize impacts to adjacent residential properties. Due to the substantial grade change, reconnecting Oakwood Avenue under BL 81 and through the former entrance would require lowering the grade of the road through the former entrance by 7 – 10 ft. This grade change would extend into cemetery property. Impacts to the cemetery as a result of this, including those to the existing arch structure, would require further evaluation.

- The NYS&W Railroad, also constructed on an earthen embankment, is located between the existing I-81 and Oakwood Cemetery. Rail operation must be maintained in this location and the horizontal and vertical alignment of the railroad tracks cannot be altered. Raising the elevation of BL 81 could require the construction of retaining walls to support the BL 81's embankment and avoid impacting rail operations.

As stated above, the NYSDOT considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Following the March 31, 2021 meeting, several Consulting Party members reiterated their comments regarding Oakwood Cemetery in email correspondence to Assemblymembers Pamela Hunter and William Magnarelli and Senator Rachel May, dated June 17, 2021 (Enclosure 7). In response to that email, Oakwood Cemeteries, Inc. sent a letter to the NYSDOT, dated July 22, 2021, which served to provide clarification on Oakwood Cemetery's position on the matter (Enclosure 8). The correspondence states "...Oakwood is the sole entity authorized to take positions on behalf of the cemetery... it is unlikely that Oakwood would open up the main entrance any time soon because of the vandalism and public safety concerns acknowledged in the email."

If you have any questions, please feel free to contact Jessica Prockup at Jessica.Prockup@dot.ny.gov.

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb
Encl: Enclosure 1: (Correspondence and Attachment 3, NYSDOT to SHPO, November 21, 2016)
Enclosure 2: (Correspondence, SHPO to NYSDOT, December 7, 2016)
Enclosure 3: (Correspondence, Consulting Parties to NYSDOT, September 11, 2019 September 12, 2019, and September 12, 2019)
Enclosure 4: (Correspondence, NYSDOT to SHPO, December 3, 2019)
Enclosure 5: (Correspondence, SHPO to NYSDOT, February 24, 2020)
Enclosure 6: (Oakwood Cemetery National Register Nomination Form)
Enclosure 7: (Correspondence, Consulting Parties to Assemblymembers Hunter & Magnarelli & Senator May, June 17, 2021)
Enclosure 8: (Correspondence, Oakwood Cemetery, Inc. to NYSDOT, July 22, 2021)

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

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

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

Dear Dr. Armstrong:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
- SHPO to NYSDOT (April 12, 2021); The SHPO found no additional information that would alter their previous concurrence. The comments in the March 4, 2021 letter remain unchanged noting the amendments.
- SHPO to NYSDOT (April 15, 2021); The SHPO concurred with the recommendation that the proposed actions will have *no adverse effect* upon the historic resources listed in the NYSDOT April 8, 2021 letter.
- NYSDOT to FHWA (April 20, 2021); The NYSDOT requested that the FHWA make Section 4(f) determinations of *de minimis* use for twelve (12) properties based on the written concurrence of the SHPO with Section 106 findings of *no adverse effect* for the Community Grid Alternative.
- FHWA to NYSDOT (April 23, 2021); The FHWA issued a determination that the Viaduct Alternative would result in an *adverse effect* to historic architectural resources, and the Community Grid Alternative would have *no adverse effect* on historic architectural resources. The FHWA concurred with the development of a PA to outline the continued Section 106 consultation process and assessment for archaeological resources.

Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
- March 31, 2021 Meeting Summary/Notes

Response to concerns brought up by Consulting Parties at the March 31, 2021 meeting.

In response to concerns raised at the Consulting Parties meeting held on March 31, 2021, and written comments submitted based on review of the draft Finding Documentation, the NYSDOT sent a letter to the FHWA on August 19, 2021 with a chronological summary and results of Section 106 consultation with the SHPO regarding the National Register eligibility of the Pioneer Homes. Additionally, the letter documented a historical context and summary of the NYSDOT's consideration of design options in the vicinity of the former entrance to the Oakwood Cemetery. The NYSDOT letter to the FHWA concluded that the correspondence between the SHPO and the NYSDOT and the associated documentation represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT also considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
Finding Documentation I-81 Viaduct Project
Correspondence letter: NYSDOT to SHPO (February 10, 2021)
Correspondence letter: SHPO to NYSDOT (March 4, 2021)
Correspondence letter: NYSDOT to SHPO (April 8, 2021)
Correspondence letter: SHPO to NYSDOT (April 12, 2021)
Correspondence letter: SHPO to NYSDOT (April 15, 2021)
Correspondence letter: NYSDOT to FHWA (April 20, 2021)
Correspondence letter: FHWA to NYSDOT (April 23, 2021)
Correspondence letter: NYSDOT to FHWA (August 19, 2021) with 8 enclosures
Presentation 1 from March 31, 2021 Consulting Parties meeting
Presentation 2 from March 31, 2021 Consulting Parties meeting
March 31, 2021 Consulting Parties meeting summary
Draft Programmatic Agreement

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

John Auwaerter, Board Member
Historic Oakwood Cemetery Preservation Association
PO Box 15065
Syracuse, New York 13215

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

Dear Mr. Auwaerter:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

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Programmatic Agreement (PA)

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Kate Auwaerter
Preservation Planner
Syracuse-Onondaga County Planning Agency
201 E. Washington Street; Suite 500
Syracuse, NY 13202

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

Dear Ms. Auwaerter:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

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Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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cc: R. Davies, FHWA NY Division (w/out encl.)
J. Gross, FHWA NY Division (w/out encl.)
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N. Herter, NYSOPRHP/SHPO (w/ encl.)
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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

David Bottar, Executive Director
Central New York Regional Planning and Development Board (CNYRPDB)
126 N. Salina Street
Syracuse, NY 13202

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

Dear Mr. Bottar:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

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Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

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cc: R. Davies, FHWA NY Division (w/out encl.)
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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
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MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Craig L. Corriders
Housing Property Manager
Syracuse Housing Authority
516 Burt Street
Syracuse, NY 13202

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

Dear Mr. Corriders:

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Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
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Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

James D'Agostino
Director
Syracuse Metropolitan Transportation Council
126 N. Salina Street, Suite 100
Syracuse, NY 13202

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

Dear Mr. D'Agostino:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA

determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
- March 31, 2021 Meeting Summary/Notes

Response to concerns brought up by Consulting Parties at the March 31, 2021 meeting.

In response to concerns raised at the Consulting Parties meeting held on March 31, 2021, and written comments submitted based on review of the draft Finding Documentation, the NYSDOT sent a letter to the FHWA on August 19, 2021 with a chronological summary and results of Section 106 consultation with the SHPO regarding the National Register eligibility of the Pioneer Homes. Additionally, the letter documented a historical context and summary of the NYSDOT's consideration of design options in the vicinity of the former entrance to the Oakwood Cemetery. The NYSDOT letter to the FHWA concluded that the correspondence between the SHPO and the NYSDOT and the associated documentation represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT also considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Robert Haley
Sustainable Planning, Architecture and Urban Design
137 Buckingham Ave.
Syracuse, New York 13210

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

Dear Mr. Haley:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

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Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

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Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Eleanor L. Johnson
Town of DeWitt Historian
Historical Preservation Society
6497 Randall Road
DeWitt, NY 13214

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

Dear Ms. Johnson:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

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Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Grant Johnson, President
Preservation Association of Central New York
930 James Street
Syracuse, NY 13203

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

Dear Mr. Johnson:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

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NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Owen Kerney
Assistant Director
Syracuse-Onondaga County Planning Agency
201 E. Washington Street; Suite 500
Syracuse, NY 13202

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

Dear Mr. Kerney:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
- March 31, 2021 Meeting Summary/Notes

Response to concerns brought up by Consulting Parties at the March 31, 2021 meeting.

In response to concerns raised at the Consulting Parties meeting held on March 31, 2021, and written comments submitted based on review of the draft Finding Documentation, the NYSDOT sent a letter to the FHWA on August 19, 2021 with a chronological summary and results of Section 106 consultation with the SHPO regarding the National Register eligibility of the Pioneer Homes. Additionally, the letter documented a historical context and summary of the NYSDOT's consideration of design options in the vicinity of the former entrance to the Oakwood Cemetery. The NYSDOT letter to the FHWA concluded that the correspondence between the SHPO and the NYSDOT and the associated documentation represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT also considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
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cc: R. Davies, FHWA NY Division (w/out encl.)
J. Gross, FHWA NY Division (w/out encl.)
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N. Herter, NYSOPRHP/SHPO (w/ encl.)
M. Frechette, NYSDOT (w/out encl.)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

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

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

Dear Mr. Kwasnowski:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

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Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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cc: R. Davies, FHWA NY Division (w/out encl.)
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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
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MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Michael La Flair
Director of Community & Government Relations
Housing Visions
1201 East Fayette Street, Suite 26
Syracuse, New York 13210

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

Dear Mr. La Flair:

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Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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cc: R. Davies, FHWA NY Division (w/out encl.)
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MARIE THERESE DOMINGUEZ
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NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Jonathan Link Logan
Director of Northside Urban Partnership
CenterState CEO
115 W. Fayette Street
Syracuse, NY 13202

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

Dear Mr. Logan:

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Director, EIS and Special Projects Bureau

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NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Mary Robison, P.E.
City Engineer
City of Syracuse, Department of Engineering
233 E. Washington Street
Syracuse, NY 13202

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

Dear Ms. Robison:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
- SHPO to NYSDOT (April 12, 2021); The SHPO found no additional information that would alter their previous concurrence. The comments in the March 4, 2021 letter remain unchanged noting the amendments.
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- FHWA to NYSDOT (April 23, 2021); The FHWA issued a determination that the Viaduct Alternative would result in an *adverse effect* to historic architectural resources, and the Community Grid Alternative would have *no adverse effect* on historic architectural resources. The FHWA concurred with the development of a PA to outline the continued Section 106 consultation process and assessment for archaeological resources.

Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
- March 31, 2021 Meeting Summary/Notes

Response to concerns brought up by Consulting Parties at the March 31, 2021 meeting.

In response to concerns raised at the Consulting Parties meeting held on March 31, 2021, and written comments submitted based on review of the draft Finding Documentation, the NYSDOT sent a letter to the FHWA on August 19, 2021 with a chronological summary and results of Section 106 consultation with the SHPO regarding the National Register eligibility of the Pioneer Homes. Additionally, the letter documented a historical context and summary of the NYSDOT's consideration of design options in the vicinity of the former entrance to the Oakwood Cemetery. The NYSDOT letter to the FHWA concluded that the correspondence between the SHPO and the NYSDOT and the associated documentation represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT also considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
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cc: R. Davies, FHWA NY Division (w/out encl.)
J. Gross, FHWA NY Division (w/out encl.)
M. Ranslow, ACHP (w/out encl.)
N. Herter, NYSOPRHP/SHPO (w/ encl.)
M. Frechette, NYSDOT (w/out encl.)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Bill Simmons
Director
Syracuse Housing Authority
516 Burt Street
Syracuse, NY 13202

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

Dear Mr. Simmons:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

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Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
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cc: R. Davies, FHWA NY Division (w/out encl.)
J. Gross, FHWA NY Division (w/out encl.)
M. Ranslow, ACHP (w/out encl.)
N. Herter, NYSOPRHP/SHPO (w/ encl.)
M. Frechette, NYSDOT (w/out encl.)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
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MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Natalie Stetson, Executive Director
The Erie Canal Museum
318 Erie Blvd. East
Syracuse, NY 13202

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

Dear Ms. Stetson:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

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Programmatic Agreement preparation

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Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

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cc: R. Davies, FHWA NY Division (w/out encl.)
J. Gross, FHWA NY Division (w/out encl.)
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NEW YORK STATE OF OPPORTUNITY. Department of Transportation

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Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Erin M. Tobin
Vice President for Policy and Preservation
Preservation League of New York State
44 Central Avenue
Albany, NY 12206

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

Dear Ms. Tobin:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

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Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

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NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Merike Treier
Executive Director
Downtown Committee of Syracuse
115 W. Fayette Street
Syracuse, NY 13202

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

Dear Ms. Treier:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
- SHPO to NYSDOT (April 12, 2021); The SHPO found no additional information that would alter their previous concurrence. The comments in the March 4, 2021 letter remain unchanged noting the amendments.
- SHPO to NYSDOT (April 15, 2021); The SHPO concurred with the recommendation that the proposed actions will have *no adverse effect* upon the historic resources listed in the NYSDOT April 8, 2021 letter.
- NYSDOT to FHWA (April 20, 2021); The NYSDOT requested that the FHWA make Section 4(f) determinations of *de minimis* use for twelve (12) properties based on the written concurrence of the SHPO with Section 106 findings of *no adverse effect* for the Community Grid Alternative.
- FHWA to NYSDOT (April 23, 2021); The FHWA issued a determination that the Viaduct Alternative would result in an *adverse effect* to historic architectural resources, and the Community Grid Alternative would have *no adverse effect* on historic architectural resources. The FHWA concurred with the development of a PA to outline the continued Section 106 consultation process and assessment for archaeological resources.

Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA

determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
- March 31, 2021 Meeting Summary/Notes

Response to concerns brought up by Consulting Parties at the March 31, 2021 meeting.

In response to concerns raised at the Consulting Parties meeting held on March 31, 2021, and written comments submitted based on review of the draft Finding Documentation, the NYSDOT sent a letter to the FHWA on August 19, 2021 with a chronological summary and results of Section 106 consultation with the SHPO regarding the National Register eligibility of the Pioneer Homes. Additionally, the letter documented a historical context and summary of the NYSDOT's consideration of design options in the vicinity of the former entrance to the Oakwood Cemetery. The NYSDOT letter to the FHWA concluded that the correspondence between the SHPO and the NYSDOT and the associated documentation represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT also considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
Finding Documentation I-81 Viaduct Project
Correspondence letter: NYSDOT to SHPO (February 10, 2021)
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Draft Programmatic Agreement

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Andrea B. Wandersee, Executive Director
Northeast Hawley Development Association, Inc.
101 Gertrude Street
Syracuse, New York 13203

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

Dear Ms. Wandersee:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

As described in the enclosed Finding Documentation, the identification of historic architectural properties within the Project's area of potential effects (APE) has been completed. The NYSDOT applied the criteria of adverse effect (36 CFR Part 800.5(a)(1)) to document an assessment of effects on identified architectural properties within the APE for the two build alternatives, the Viaduct Alternative and the Community Grid Alternative, that have been evaluated in the Draft Environmental Impact Statement (DEIS) for the Project. An electronic copy of the draft Finding Documentation was distributed to Consulting Parties at the August 12, 2019 Consulting Parties meeting held in Syracuse, and then sent in the mail to those Consulting Party members who were not in attendance at the August 12, 2019 meeting. The assessment concludes that the Viaduct Alternative would cause *adverse effects* on the North Salina Street Historic District and nine (9) individual historic properties due to the proposed demolition and removal of buildings listed in or eligible for the National Register of Historic Places (National Register). The Community Grid Alternative, which is the preferred alternative for the Project, would cause *no adverse effects* on historic architectural properties identified within the Project's APE.

Correspondence documenting consultation among the State Historic Preservation Office (SHPO), the FHWA, and the NYSDOT for concurrence with the *Finding Documentation* is summarized as follows:

- NYSDOT to SHPO (February 10, 2021); Requested the written concurrence of the SHPO with the assessment of effects on identified National Register-eligible and National Register-listed architectural properties within the APE, and with the development of a Programmatic Agreement (PA) to provide for a phased assessment of effects on archaeological resources.
- SHPO to NYSDOT (March 4, 2021); The SHPO concurred with the recommendation that the Viaduct Alternative would have an *adverse effect* on historic architectural properties. The SHPO also concurred with the finding that the Community Grid Alternative, which requires no historic building demolition, would not adversely affect historic architectural properties. The SHPO agreed with the recommendation to FHWA for the development of a PA to guide the remainder of the Section 106 consultation process as the undertaking proceeds.
- NYSDOT to SHPO (April 8, 2021); Requested the written concurrence of the SHPO with the effect finding for the updated *Finding Documentation*. The document was updated to clarify the National Register status of three historic properties and to correct the summary list of effects on identified historic properties under the Community Grid Alternative. There were no changes or updates to the assessment of effects on any of the identified historic properties.
- SHPO to NYSDOT (April 12, 2021); The SHPO found no additional information that would alter their previous concurrence. The comments in the March 4, 2021 letter remain unchanged noting the amendments.
- SHPO to NYSDOT (April 15, 2021); The SHPO concurred with the recommendation that the proposed actions will have *no adverse effect* upon the historic resources listed in the NYSDOT April 8, 2021 letter.
- NYSDOT to FHWA (April 20, 2021); The NYSDOT requested that the FHWA make Section 4(f) determinations of *de minimis* use for twelve (12) properties based on the written concurrence of the SHPO with Section 106 findings of *no adverse effect* for the Community Grid Alternative.
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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
- March 31, 2021 Meeting Summary/Notes

Response to concerns brought up by Consulting Parties at the March 31, 2021 meeting.

In response to concerns raised at the Consulting Parties meeting held on March 31, 2021, and written comments submitted based on review of the draft Finding Documentation, the NYSDOT sent a letter to the FHWA on August 19, 2021 with a chronological summary and results of Section 106 consultation with the SHPO regarding the National Register eligibility of the Pioneer Homes. Additionally, the letter documented a historical context and summary of the NYSDOT's consideration of design options in the vicinity of the former entrance to the Oakwood Cemetery. The NYSDOT letter to the FHWA concluded that the correspondence between the SHPO and the NYSDOT and the associated documentation represent a good faith effort to consider and incorporate the views of Consulting Parties in the evaluation of the National Register eligibility of Pioneer Homes. The Section 106 record supports the Not Eligible determination for the Pioneer Homes. The NYSDOT also considered two concepts for reconnecting Oakwood Cemetery's former entrance to the street system in response to comments received from Section 106 Consulting Parties; however, neither of these options were determined to be reasonable.

Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
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cc: R. Davies, FHWA NY Division (w/out encl.)
J. Gross, FHWA NY Division (w/out encl.)
M. Ranslow, ACHP (w/out encl.)
N. Herter, NYSOPRHP/SHPO (w/ encl.)
M. Frechette, NYSDOT (w/out encl.)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 9, 2021

Quante Wright
145 Arsenal Dr
Syracuse, New York 13205

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

Dear Mr. Wright:

As a Section 106 Consulting Party for the Interstate 81 (I-81) Viaduct Project (the Project), the New York State Department of Transportation (NYSDOT), in coordination with the Federal Highway Administration (FHWA), is providing an update on the status of the Project's review 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*, including updated documentation.

Finding Documentation

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Programmatic Agreement preparation

In accordance with 36 CFR Part 800.5(a)(3), the final evaluation of historic properties is being deferred through a phased process consistent with the phased identification and evaluation efforts for archaeological resources, to be completed as the Project advances through construction. Pursuant to 36 CFR Part 800.14(b)(1)(ii), the FHWA determined the need for a PA because the Project's effects on historic properties cannot be fully determined prior to the approval of the undertaking.

On March 31, 2021, the NYSDOT, in coordination with FHWA, held a meeting with Consulting Parties in the Section 106 process for the Project. The purpose of the meeting was to engage Consulting Parties in the development of a PA to move forward with the Section 106 process for the Project. Attached for your information, please find the following items from the March 31, 2021 meeting:

- Presentation Slides from March 31, 2021 meeting (Project Status/Overview, Section 106 Status, Programmatic Agreement Background)
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Programmatic Agreement (PA)

The NYSDOT, in coordination with the FHWA, has drafted a PA in consultation with the Advisory Council on Historic Preservation, the SHPO and the Onondaga Nation. The draft PA is enclosed for your review and comment. The NYSDOT respectfully requests written comments on the draft PA by **December 9, 2021**. Written comments should be submitted to Jessica Prockup at the email address below.

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

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/ms/bb

Encl: Flash Drive containing:
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Draft Programmatic Agreement

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

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

November 10, 2021

Faithkeeper Anthony Gonyea
Rt 11A
Box 3236
Onondaga Nation
via Nedrow, NY 13120

RE: ***Section 106 Consultation: Revised Draft Programmatic Agreement***
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 revised draft Programmatic Agreement (PA), prepared for the Interstate 81 (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 PA was developed through a series of consultative meetings held among the NYSDOT, the FHWA, the New York State Historic Preservation Office (SHPO), the Advisory Council on Historic Preservation (ACHP), and the Onondaga Nation on March 31, 2021, April 27, 2021, June 22, 2021, and July 20, 2021, and stipulates the measures to be carried out to complete the phased process for determining the Project's effects on archaeological properties pursuant to 36 CFR §800.14(b)(1)(ii). The NYSDOT developed several appendices to supplement the body of the PA, in consultation with the FHWA, the SHPO, the ACHP, and the Onondaga Nation.

The NYSDOT will schedule a meeting to be held in the coming weeks to discuss the revised draft PA with the FHWA, the ACHP, the SHPO, and the Onondaga Nation. The NYSDOT respectfully requests any written comments from the Onondaga Nation on the draft PA by **December 10, 2021**. If the Onondaga Nation has any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642. The NYSDOT would like to express our appreciation of the Onondaga Nation's continuing interest in this Project.

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/jp/bb

Encl: Draft Programmatic Agreement and appendices

cc: Onondaga Council of Chiefs (w/ encl.)
Chief Sidney Hill (w/ encl.)
A. Lowry, Onondaga Nation (w/ encl.)
T. Lee, Onondaga Nation (w/ encl.)
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.)
M. Frechette, NYSDOT (w/out encl.)
M. Schreck NYSDOT (w/ encl.)

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

December 3, 2021

Faithkeeper Anthony Gonyea
Rt 11 A
Box 245
Onondaga Nation
via Nedrow, NY 13120

RE: ***Section 106 Consultation: Revised Draft Programmatic Agreement***
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 revised draft Programmatic Agreement (PA), prepared for the Interstate 81 (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 document and electronic files were originally transmitted on November 10, 2021 (see enclosed letter). However, based upon comments raised during the November 30, 2021 meeting, the NYSDOT is re-sending the hard copy of the revised draft Programmatic Agreement.

The NYSDOT originally requested any written comments from the Onondaga Nation on the draft Programmatic Agreement by December 10, 2021. In consultation with the FHWA, the NYSDOT is extending this period and respectfully requests comments from the Onondaga Nation on the draft Programmatic Agreement by **December 24, 2021**. If the Onondaga Nation has any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642. The NYSDOT would like to express our appreciation of the Onondaga Nation's continuing interest in this Project.

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/los/jp

Encl: Draft Programmatic Agreement and appendices

cc: Onondaga Council of Chiefs (w/out encl.)

Chief Sidney Hill (w/out encl.)
A. Lowry, Onondaga Nation (w encl.)
T. Lee, Onondaga Nation (w encl.)
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.)
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

December 23, 2021

Catherine Leslie
Director, EIS and Special Projects Bureau
New York State Department of Transportation
50 Wolf Road
Albany, NY 12232

Re: Revised Draft Programmatic Agreement for the I-81 Viaduct Project

Dear Ms. Leslie:

The Onondaga Nation has reviewed the Revised Draft Programmatic Agreement (RDPA) discussed during our November 30, 2021 conference call. In consultation with Anthony Gonyea, the Nation's Section 106/NAGPRA Representative, and Tiffany Lee, a Nation citizen and trained archaeologist, I am providing the following comments that identify several concerns and questions about the RPDA and propose some specific changes to its language.

I. Scope of Native Nation Monitoring:

Our primary concern is the scope of the Native Nation monitoring proposed in the RDPA. The Nation appreciates the decision to make Native Nation Monitors, paid through the project funds, a part of the project. I-81 construction will involve ground-disturbing activity along or near Onondaga Lake and Onondaga Creek, both of which were central to Onondaga ancestors, who have lived in this area since time immemorial.

Onondaga Lake is sacred to the Nation. Over 1,000 years ago, the Peacemaker came from Lake Ontario into Onondaga Lake, paddling in a white stone canoe. He brought a message of peace and unity to the Five Nations, who were then at war. His travels took him to the east end of Onondaga Lake and south along Onondaga Creek, making these areas of spiritual importance to the Nation. As a fishing people, the Onondaga traditionally centered their life around waterways. Onondaga villages were historically located on or near Onondaga Lake and Onondaga Creek, which was also

a primary fishing location and travel route. Other historic waterways, including Mud Creek and Butternut Creek, were also likely to host Onondaga fishers, fishing camps, and small or temporary dwellings. For these reasons, areas near Onondaga Lake, between the Lake and Onondaga Creek, or along the historic pathways of Onondaga Creek, Mud Creek and Butternut Creek are particularly sensitive for cultural artifacts. While Onondaga artifacts may be found anywhere within the project area, which encompasses the heart of the Onondaga's traditional territory, these defined areas require special care.

A. **Native Nation Monitors should be required during all ground-disturbing construction activity throughout the project area.**

The Nation has repeatedly raised concerns about the adequacy of the shovel test pits (STPs) already conducted in the project area, as well as the limits of the proposed machine-aided testing and construction monitoring. Because of these concerns, and because of the number of project areas close to historic or current waterways, known to have unscreened fill, or otherwise recognized by the Nation as of cultural or historic importance, the Nation has asked that Native Nation Monitors be present in all areas of ground disturbance <u>while excavation is occurring</u>. This expanded scope of investigation and the role of Native Nation Monitors should be incorporated into a revised Phase IB Work Plan.

As early as 2017, the Nation raised concerns about the adequacy of the initial portions of the Phase IB assessment, including the limited areas subjected to STPs and the limits of the STPs themselves in many areas. Items found during this investigation were sometimes simply described as "modern" without accompanying photographs. This is problematic since objects that might be considered "modern" (i.e., metal buttons or glass items) were often owned by "post-contact" Onondaga peoples and might indicate burials or other culturally important places. The exclusion of "cut-and-fill" areas from monitoring is also a concern. In our experience, burial objects, cultural artifacts, and even human remains may be present but scattered in previously disturbed soils or even in fill material, if the fill was not screened before placement. These scattered artifacts are much less easily identifiable by construction workers, who are not trained or experienced in these matters. Scattered cultural artifacts, funerary objects, and "modern" items that may have been acquired by Onondaga ancestors, along with the partial/full human remains that can be encountered in disturbed soil or fill, remain valuable and important to the Nation and should be considered eligible for additional evaluation and protection. Providing construction monitoring and ensuring that Native Nation monitors are present is the best way to ensure that this happens.

These concerns, along with the addition of Native Nation Monitors and the potential expansion of pre- and during-construction assessment based on the Nation's cultural knowledge, should have resulted in the issuance of a revised Phase IB Work Plan, a change which the Nation continues to support. In addition, we note that the Nation's on-going concerns about the adequacy of STPs and the limits of testing are not acknowledged in the "Whereas" clauses, which instead simply states that the New York State Historic Preservation Office (SHPO) has no outstanding concerns. The

Draft PA should be revised to include a "Whereas" clause that states that the Nation has raised concerns about prior archaeological work and about planned archaeological work, which have not been addressed.

Most importantly, for the reasons given above, the Revised Draft PA be revised to include Native Nation Monitors during all ground-disturbing activities. These Monitors might not remain on site throughout the excavation process if, based on the soil structure or other on-the-ground information revealed during initial stages of excavation and their own knowledge of Onondaga history and culture, they determined that a particular area was not sensitive for artifacts or human remains. Entirely above-ground construction would not require the presence of Native Nation Monitors.

B. The Scope of Native Nation Monitoring Should, At Minimum, Be Expanded to Include Additional Sensitive Areas.

If the DOT is unwilling to expand Native Nation Monitoring to all areas of ground-disturbance, monitoring should at least be expanded to additional sensitive areas. This includes areas near former waterways, areas known to the Nation as culturally sensitive, and any areas identified as potentially sensitive during construction.

The additional areas should include all areas of ground-disturbing activity that have, at any time, been designated as sensitive for Native American Archaeology at or for human remains (App 2: Phase IB Work Plan, Figure 4/Sheet 2). In addition, due to their cultural and historic significance to the Onondaga Nation, sensitive areas subject to Native Nation Monitoring should include all areas near Onondaga Lake, including areas along Onondaga Lake Parkway, Park Street, and Old Liverpool Road. Similarly, because of the cultural and historic centrality of waterways for fishing gathering, and habitation, all areas within ¼ mile of the current or historic paths of Onondaga Creek, Butternut Creek, and Mud Creek should be considered sensitive and require Native Nation Monitors. Finally, unexpected finds of artifacts or human remains strongly suggest that nearby areas are also sensitive. Native Nation Monitors should be present for ground-disturbing construction within 50 meters of any unexpected finds of artifacts or human remains.

For the reasons described in Section I.A., the Nation does not believe that areas with unscreened fill should be excluded from this additional monitoring. Expanding construction monitoring to include these additional sensitive areas will help ensure that Haudenosaunee artifacts, cultural objects, funerary objects, and intact or scattered remains are not overlooked during construction.

C. The RDPA should be revised to expand sensitivity indicators, clarify the scope of pre- and during-construction monitoring, and expand monitoring to newly discovered sensitive areas.

Whether or not additional areas are designated as sensitive and as requiring Native Nation Monitors, the Nation proposes several specific changes to the language of the RDPA and appendices with respect to the scope of pre-construction archaeological assessment and construction monitoring for clarity and consistency. These changes include recognizing the importance of oral history and indigenous knowledge on sensitivity determinations, clarifying the treatment of all areas designated as eligible for machine-aided testing, ensuring additional monitoring for areas that have proven to be sensitive, and ensuring that the role of Native Nation monitors is described consistently throughout the document.

First, the RDPA lists the factors to be considered in determining the archaeological sensitivity of areas within the project scope. The listed factors include existing conditions, depth of impacts, and type and extent of prior ground disturbance. These factors should be expanded to include both historic geology of the area, particularly proximity to current and historic waterways, and the Onondaga Nation's oral history or other knowledge of ancestral presence in the area. This amendment would affect the fourth full "Whereas" clause on page 3 of the RDPA, which should be amended to read:

> **WHEREAS, the Phase IA Assessment concluded that the potential presence of archaeological sites within the APE is highly variable, required different methods of archaeological investigation depending on existing conditions, the anticipated depth of proposed project impacts, and the type and extent of prior ground disturbance at specific locations and the NYSDOT along with FHWA recognizes that sensitivity for Haudenosaunee artifacts also depend on the proximity to current and historic waterways and the Onondaga Nation's oral history or other indigenous knowledge of ancestral presence in an area; and**

Second, neither the RDPA nor the Phase IB Work Plan is clear about the treatment of areas designated for machine-aided testing that are not actually subjected to examination. The Phase IB Work Plan indicates that "test trenches will be excavated within selected locations" to look for archaeological resources in sensitive areas currently covered by fill, pavement, or other overburden (App. 2: Phase IB Work Plan, p. 14). A limited number of locations within the designated sensitive areas will be tested, including a maximum of three locations along the historic alignment of Onondaga Creek. The test trenches themselves will be, at maximum, 10' wide by 50' long. This suggests that large portions of the area along the historic alignment of Onondaga Creek will not be directly investigated through the machine-aided testing.

The next phase of oversight, construction monitoring, is described as limited to "those areas where removal of pavement in advance of construction is not feasible (such as within active

roadways)" (App 2: Phase IB Work Plan, p. 16). This description suggests that areas which were potentially subject to machine-aided testing, but were not excavated and examined, would be outside the scope of construction monitoring. This is nonsensical, given the limited area actually investigated by machine-aided testing and the acknowledged sensitivity of these areas, particularly those within the historic pathway of Onondaga Creek. Either the Phase IB Work Plan itself or the RDPA should be amended to ensure that areas eligible for, but not investigated under, machine-aided testing undergo construction monitoring, which includes Native Nation Monitors.

The RDPA should also be amended to clarify that Native Nation Monitors will be present during Machine-Aided Testing. Native Nation Monitors are assumed to be part of machine-aided testing in Appendix 5, but Stipulation V.A does not specifically mention Native Nation Monitors, as is done in Section V.B.3 for monitoring during construction. This may cause confusion. The Nation proposes that the following sentence be added as the final sentence in Stipulation V.A.1:

> **V.A.I: Machine-aided testing will be conducted in advance of construction . . . . The Onondaga Nation will provide Native Nation Monitors to participate as described in Appendix 5 during machine-aided testing.**

Last, the RDPA should be amended to clarify that Native Nation Monitors will be present in all areas that are designated for archaeological monitoring before or during construction as well as areas that are determined to be sensitive for archaeological and cultural resources during construction as a result of unanticipated discovery of cultural artifacts or human remains. Specifically, the Nation proposes that Stipulation V.B.3 be amended to read as follows:

> **V.B.3: The Onondaga Nation will provide Native Nation Monitors to participate in archaeological monitoring during construction in locations specified in the approved *Phase IB Work Plan*, in any additional areas designated for archaeological monitoring in the Construction Phase Archaeological Work Plan, and in any areas where unanticipated discoveries of Haudenosaunee or potentially Haudenosaunee archaeological resources, cultural objects, including objects of cultural patrimony, sacred objects, and funerary objects, or human remains are made, as described in Appendix 5.**

These smaller changes will not ensure that Native Nation Monitors are present in all sensitive areas or in all locations where Native American artifacts or human remains are likely to be present. However, they will at least ensure that the monitoring protocols are internally consistent and that the RDPA acknowledges the value of Haudenosaunee cultural knowledge.

II. Curation of Archaeological Materials

The Nation recognizes that the Department of Transportation is bound by state law and cannot decide on its own to, for example, turn over any and all Haudenosaunee artifacts to the Nation

immediately upon discovery. Archaeological artifacts found on site are, under state law, considered the property of the state and must be processed and prepared for accession by the New York State Museum, pursuant to New York Education Law, Section 233 (RDPA, p. 3). However, the RDPA fails to acknowledge federal law obligations that may require the New York State Museum to repatriate cultural artifacts discovered on-site to the Nation upon request.

Under the Native American Graves Protection and Repatriation Act (NAGPRA), museums, including the New York State Museum, are required to inventory and offer for repatriation human remains and cultural objects, including objects of cultural patrimony, sacred objects, and funerary objects whether or not associated with a known burial, which are affiliated with a specific Native Nation and which the museum possesses or controls. 25 U.S.C. §§ 3003-3004. The RDPA acknowledges the Nation's interest in and affiliation with any and all Haudenosaunee artifacts discovered during construction, noting that the Nation has an interest in curating these items (RDPA, p. 3) and providing two options for such artifacts to be returned to the Nation (RDPA, Stipulation V.B.1, V.B.2). In addition, as recognized by the RDPA, under New York law, the New York State Museum "controls" artifacts of any sort found within the construction site. NY Educ, § 233; RDPA, Stipulation, V.B. Accordingly, any cultural objects that may be found on-site during the I-81 construction are subject to NAGPRA and must be expeditiously returned to the Nation upon request, 25 U.S.C. § 3005(a)(1).

This federal obligation takes precedence over state law and the RDPA should be revised to acknowledge that fact. Accordingly, the Nation suggests an addition to Stipulation III.B. We propose the following:

> **III.B.3: If any artifacts which may be or are determined to be cultural objects, as defined by the Native American Graves Protection and Repatriation Act, 25 U.S.C. § 3001 *et seq.*, are discovered, the NYSDOT shall notify the Onondaga Nation and the New York State Museum and the cultural objects shall be immediately offered to the New York State Museum for review, inventory/summary, publication of notice, and repatriation to the Nation, pursuant to NAGPRA. If the State Museum declines to take possession or control of cultural objects, the NYSDOT shall immediately offer to return the objects to the Onondaga Nation. If both the State Museum and the Onondaga Nation decline to take possession of artifacts that are or may be cultural objects, as defined by NAGPRA, these materials may be retained, processed, and prepared by the Archaeologist in the same manner as any other artifacts collected during construction.**

In addition, we ask that the NYSDOT recognize that the Onondaga Nation has the priority claim on any Haudenosaunee artifacts not covered by NAGPRA and not accessioned by the New York State Museum. Specifically, rather than allowing NYSDOT to offer Haudenosaunee artifacts

not claimed by the State Museum to the Nation, the RDPA should be revised to mandate that transfer. Specifically, we propose the following change:

> **III.B.2: If the State Museum declines to accession any Haudenosaunee artifact(s) or archaeological collections from state lands under the jurisdiction of the NYSDOT, the NYSDOT shall then offer these objects to the Onondaga Nation.**

III. The Role of Native Nation Monitors:

As currently described in the RDPA, Native Nation Monitors are essentially considered part of the archeological monitoring team. While Nation monitors generally work collaboratively with on-site archaeologists when in the field, additional clarity is needed in the RDPA on the authority of Native Nation Monitors to investigate, evaluate, and protect archaeological resources.

First, Native Nation Monitors must be able to halt or slow construction work to investigate potential archaeological or cultural resources. The Nation's preference would be to amend Appendix 4 and 5 to allow either the Archaeologist, in the form of the Crew Chief on site, or the Native Nation Monitor to call for a work stoppage/slowdown. While this would mean that two people, rather than one person, per site could make such a call, it seems unlikely that such a small change would create confusion. To effect this change, Appendix 4 could be amended to state that Crew Chiefs "will ensure that the [Engineer in Chief (EIC)] is fully informed and approves any request for a temporary halt in construction . . . to allow the Archaeologist to examine potential cultural materials and features" and to state that "Native Nation Monitor(s) . . . will communicate **to the EIC** any request for a temporary halt in construction to examine potential cultural materials, features, or human remains." The same change should be made to Appendix 6, p. 3.

Alternatively, if communication is required to go from the Native Nation Monitor to the Archaeological Crew Chief to the EIC, the RDPA should be amended to ensure that Native Nation Monitor requests are respected. Appendix 4 should be amended to state that the Crew Chiefs "will ensure that the EIC is **promptly** informed **of** and approves any request for a temporary halt in construction, **whether requested by the Archaeologist or the Native Nation Monitor**, as per the approved . . . ." In addition, the paragraph describing the roles and responsibilities of the EIC should add the following sentence: "**The EIC is responsible for ensuring that construction work is stopped or slowed promptly upon request by the Archaeologist or the Native Nation Monitor.**" A similar amendment should be made to Appendix 5. Specifically, an additional sentence should be added to the final paragraph on page 1, which reads "**The Archaeologist will promptly convey the Native Nation Monitor's request to the EIC, who will ensure that the requested action is taken.**" This type of change should also be made to Attachment 1: Archaeological Monitoring During Construction Process, which suggests that NYSDOT can deny requests for initial investigation (labeling them "requests) or extended investigation (noting under

Step 4 of the review process, that an extended investigation of up to 8 hours can be done "if. . . this request is approved by NYSDOT").

Second, Appendix 5 should be amended to recognize that artifacts may require additional investigation either because they are potentially National Register eligible, as per Section 106 of the National Historic Preservation, or because they are potentially related to or indicative of a burial site. In addition to the detailed investigation of potentially National Register eligible artifacts and the subsequent discussion of the response to the discovery of human remains or potential human remains, Appendix 5 should include time frames and procedures for investigating items observed during construction that could be considered funerary objects, including how to determine whether human remains are, in fact, present in the area and how the potential funerary items themselves should be handled.

Third, Appendix 5 states that "Native Nation Monitors will monitor locations in accordance with the approved *Phase IB Work Plan* and *Construction Phase Archaeological Work Plan* and will not direct the contractor to conduct field operations for the purposes of archaeological investigation at new locations." This intent of this provision is unclear. Does this mean that Native Nation Monitors must ignore potential artifacts that they may observe in areas within the APE, but outside the designated construction monitoring zones? Or that Monitors can't request investigation of artifacts that are observed in areas wholly outside the APE? Some additional clarification of this provision is required.

Last, we remain concerned that there are discrepancies between the NYS DOT Procedures for inadvertent discovery of human remains and the Haudenosaunee Protocol. For example, the DOT Procedure only requires notification of Native Nations after a police investigation, while the Haudenosaunee Protocol requires immediate notice and the presence of a Native monitor on site during the investigation of the remains. These discrepancies should be resolved in favor of the Haudenosaunee protocol.

IV. Communication About and Advance Notice of Monitoring Requirements

The Nation has committed to providing Native Nation Monitors for the remaining pre-construction assessment and construction monitoring related to the I-81 project. To meet this obligation, however, it is essential that the Nation receive sufficient notice of work plans. Appendix 6 should be amended to ensure that advance notice of all work requiring Native Nation Monitors is provided as far in advance as possible and, in all cases, with enough notice to allow Monitors to participate.

The notice described for machine-aided testing, in particular, is inadequate. Appendix 6 states that notice of the general location of this work may be provided to the Nation a mere week in advance of the planned start date with specific location updates provided only 12 hours in advance. This provision should be amended to specify that a tentative schedule for machine-aided testing,

including the number of machine-aided testing locations that may be active at the same time, be provided when the general construction schedule/construction milestones are developed and released. The proposed locations for assessment can be provided a week in advance with updates to those tentative plans provided 12 hours in advance, but the Nation must be informed at least two weeks in advance of the number of Monitors that may be required on specific dates or, at minimum, that their work will begin on or around a certain day.

Similarly, while one week's notice of the specific locations that will be under construction and will require construction monitoring involving Native Nation Monitors may be adequate, the Nation must have additional notice of the tentative schedule for construction and an estimate of the number of monitored construction sites that may be active at the same time. At minimum, the Nation should be provided two weeks' notice of the proposed schedule *or of any changes to that schedule*, as with the machine-aided testing.

Appendix 6 also discusses notice by the EIC of the locations and specific construction activity planned for a particular day, as well as the required time of arrival. This notice is to be provided "within a timeframe to be determined by the EIC/Supervisor" (App. 6, p. 2). This entirely discretionary notice is not acceptable. At minimum, the EIC should provide details on planned work locations and required times of arrival 24 hours in advance. If changes are made after that point, notice of the changes must be made by direct phone calls rather than e-mail or other indirect notice.

At several points, the Draft PA emphasizes that work may continue on site if Native Nation monitors are not present or do not arrive on site at the designated time. While the Nation recognizes its obligation to provide monitors, construction managers should have a comparable obligation to take minimal steps to ensure that necessary monitors are present. We note that Appendix 6 stipulates that, if the Archaeologist or the Native Nation Monitor does not check in to a construction site at the specified time, the EIC/Construction Manager is authorized to begin construction without the presence of the Native Nation Monitor. Appendix 6 does not provide a similar dispensation for the presence of the Archaeologist. This wording suggests that work would not begin without the Archaeologist and that some additional steps would be taken to ensure that there is an Archaeologist on site. The Draft PA should be revised to reflect the fact that Native Nation Monitor are just as necessary as Archaeologists and that the same steps would be taken to ensure that Native Nation Monitors are present as would be done to ensure that the Archaeologist is present.

At minimum, these statements in the Draft PA, Stipulations I.B and I.E; App. 5, p. 4; App. 6, p. 3 should be revised to allow work to continue without a Native Nation monitor if and only if DOT staff and/or construction managers have made at least one attempt to contact Nation representatives directly to inform them of the unmonitored site and to provide an opportunity to correct the issue. Specifically, the provisions should be modified as follows:

Stipulation IB: The NYSDOT's commitment and ability to complete implementation of the approved Phase IB Work Plan will not be impaired if the Native Nation Monitors do not participate in the full range of continuing archaeological investigations as long as the DOT and/or construction management have provided the notice required in Appendices 5 and 6.

Stipulation IE: Construction shall not be precluded from progressing if Native Nation Monitors are not present, as long as the DOT and/or construction management have provided the notice required in Appendices 5 and 6, as stipulated here.

Appendix 5 (p. 4): The Archaeologist will conduct Phase II investigations in coordination with Native Nation Monitor(s) for Native American sites, or Native American components of multicomponent sites. The Archaeologist will provide reasonable advance notice of Phase II investigations, but will in no case provide less than 24 hours notice. If the Native Nation Monitor is not present at the intended start of fieldwork, the Archaeologist will contact the Native Nation representative by phone to request the presence of a Native Nation Monitor. With proper advance notice and after providing direct notice of the unmonitored site, the Archaeologist may proceed with field work, if the Native Nation Monitor is not present.

Appendix 6 (p. 2): If the Archaeologists or the Native Nation Monitor(s) fail to report to the field office by the time specified, the EIS/Construction Manager will contact the Native Nation representative by phone to request the presence of a Native Nation Monitor. With proper advance notice and after providing direct notice of the unmonitored site, the EIS/Construction Manager may proceed with the day's planned construction activities without the presence of the Native Nation Monitor(s).

Communication with the Nation must be by phone and direct mail, not e-mail alone. Notification of construction milestones; of the dates and locations of machine-aided testing; of the dates, locations, and proposed work schedule for construction monitoring; of any discoveries of archaeological artifacts; and especially of any discovery of human remains must be done by phone with hard copies of this information sent by direct mail. Follow-up e-mails with additional details may be permissible, with the express permission of the Nation representative being contacted or notified. In addition, DOT should be sure to included updated contact information for Anthony Gonyea, rather than the dated information that is included in the Phase IB Work Plan.

Finally, the Draft PA envisions a 15-day review period for several documents, including Phase II Work Plans and Phase III Data Recovery Plans. This review period is inadequate, particularly

given that key Nation representatives require hard copies of such documents. The Draft PA should be revised to set the minimum review period at 30 days.

V. Contracting with Native Nation Monitors

The RDPA and its appendices are not consistent in their discussion of payment of Native Nation Monitors. Appendix 5 recognizes that Native Nation Monitors will be paid through a contract with the NYSDOT, but suggests that the contract will be negotiated with the Nation itself and that federal payments would go to the Nation, presumably for distribution to the Monitors. In Appendix 4, the Construction Contractor is designated as responsible for paying Native Nation Monitors, suggesting a direct contract or subcontract between the Construction Contractor and the Monitors.

As discussed in our most recent conference call, a contract between the NYSDOT and the Onondaga Nation as an entity is not a viable option. The Nation does not typically provide services under contract and does not currently have a process for doing so. Creating this process would be, at best, protracted and cumbersome. The better alternative would be individual subcontracts with designated Native Nation Monitors. These contracts could be directly between NYSDOT and the Native Nation Monitors or could be subcontracts through the archaeology firm. The latter option has been used successfully in the past. The Nation requests that Appendices 4 and 5 be amended to reflect this change in contracting methods.

Thank you for your attention to these comments. Please let us know if you have questions. We look forward to working with you both in resolving these concerns and in monitoring the I-81 project for potential impacts on archaeological and cultural resources.

Sincerely,

Alma L. Lowry, Of Counsel

cc: Council of Chiefs
Jared Gross, FHWA
David Clarke, FHWA
Mandy Ranslow, ACHP

NEW YORK STATE OF OPPORTUNITY. Department of Transportation

KATHY HOCHUL
Governor

MARIE THERESE DOMINGUEZ
Commissioner

NICOLAS A. CHOUBAH, P.E.
Acting Chief Engineer

January 20, 2022

Faithkeeper Anthony Gonyea
Rt 11 A
Box 245
Onondaga Nation
via Nedrow, NY 13120

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

Dear Faithkeeper Gonyea:

As requested, please find a hard copy of the sections of the draft Programmatic Agreement (PA), prepared for the Interstate 81 (I-81) Viaduct Project (the Project), showing revisions as displayed on-screen during our Section 106 Programmatic Agreement Working Group meeting on January 18, 2022.

If the Onondaga Nation has any questions, please contact Jessica Prockup at jessica.prockup@dot.ny.gov or 518-417-6642. The NYSDOT would like to express our appreciation of the Onondaga Nation's continuing interest in this Project.

Sincerely,

Catherine Leslie

Catherine Leslie
Director, EIS and Special Projects Bureau

CL/jp/bb
Encl: Revised Draft Programmatic Agreement (body)
Appendix 4: Roles and Responsibilities in Construction
Appendix 5: Native Nation Consultation and Attachment 1
Appendix 6: Coordination and Communication Protocols in Construction and Attachment 2
Historic Location of Streams and Surrounding Sensitivity and Maps

cc: Onondaga Council of Chiefs (w/out encl.)
Chief Sidney Hill (w/out encl.)
A. Lowry, Onondaga Nation (w/out encl.)
T. Lee, Onondaga Nation (w/out encl.)
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.)
M. Frechette, NYSDOT (w/out encl.)

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February 24, 2022

Catherine Leslie
Director, EIS and Special Projects Bureau
New York State Department of Transportation
50 Wolf Road
Albany, NY 12232

Re: Draft Programmatic Agreement for the I-81 Viaduct Project

Dear Ms. Leslie:

Over the past several months, the Onondaga Nation, the New York State Department of Transportation (NYSDOT), and the Federal Highway Administration (FHWA) have collaborated extensively to develop a Programmatic Agreement (PA) for on-going archaeological assessment of the I-81 project. The Nation appreciates the time and energy that NYSDOT and FHWA have invested in this work.

While we would have preferred an initial agreement to incorporate Native Nation monitors at every site of ground disturbance, the proposed PA will help to ensure that Native Nation monitors are present during ground-disturbing activities in sensitive areas of the project. These include the areas that have been selected for machine-aided testing or construction monitoring in the Phase IB Plan and those that will be identified in pre-construction consultation between NYSDOT, the State Historic Preservation Office (SHPO), and the Onondaga Nation regarding areas that the Nation defined as particularly sensitivity for Native artifacts (indicated by yellow hatching in the most recently circulated project maps). The Nation continues to believe that these sensitive areas require monitors and fully expects that, upon consultation, NYSDOT will agree that archaeological and Native Nation monitoring should be expanded into these recognized sensitive areas.

However, NYSDOT has also excluded many areas from archaeological or Native Nation monitoring because it has determined that these areas are composed of fill material or contain

highly disturbed soils. While the Nation is still convinced cultural artifacts or even human remains may be present in unscreened fill within these "disturbed" areas, we are also concerned that assessments of soil conditions based on historic records may not be accurate. To resolve this concern with minimal disruption to the current PA, the Nation proposes that Native Nation monitors perform "spot checks" on construction sites outside the areas of Native Nation monitoring. If the soil conditions are as described in the Phase IA and Phase IB assessment (i.e., fill material or disturbed soils with no sign of artifacts or remains), no further work will be undertaken. If the assumed conditions are not met, the site should be added to the areas of Native Nation monitoring.

Our understanding is that NYSDOT and its consultants made the initial determinations of areas that could be excluded based, in part, on historic coring data from other construction within the project area. The Nation is requesting copies of that coring data or any other historic data not available in the Phase IA and IB investigations for this project. That data will be useful both in the consultation around Native Nation monitoring in potentially sensitive area and in evaluating whether areas excluded from monitoring altogether are in the condition assumed in earlier assessments.

Despite prior comments, the language regarding contracting with Native Nation monitors in the draft PA has not changed. Given the difficulties of contracting with the Onondaga Nation directly, we again propose that this language be revised to indicate that Native Nation monitors will essentially be individually employed as subcontractors by either the NYSDOT or the archaeology contractor. While the details of the contracts may be negotiated with representatives of the Onondaga Nation, the contracts should be signed by the individual monitors and payments should go directly to them. In addition, given the relatively complex and fluid construction schedule and communication needs described in the draft PA and appendices, the Nation proposes that the subcontracts either include a "lead" monitor with the ability to bill for a defined range of administrative/management work (e.g., communicating with the construction and archaeological consultants, assigning Native Nation monitors to specific sites, managing time records) or include a supported part-time administrative/management position. Although we recognize that not all the details of these contracts will be part of the PA, we also want to flag some additional issues that will have to be considered during contracting, including payments for travel time, training, and overtime.

Finally, although these details are not necessary for the PA itself, it would be useful for planning purposes to get additional information now about any training requirements or opportunities, equipment requirements, and other logistics related to the Native Nation monitors. Specifically, are there any OSHA or general construction site safety training or certifications that will be required or would be beneficial for Native Nation monitors before beginning work? Would

hazardous material handling training be necessary or useful? If any of these types of training would be useful, does NYSDOT have any recommendations for training programs? What basic safety equipment (e.g., hard hats, steel toed shoes) will be required for monitors? Will those be provided by NYSDOT or the construction contractor or should they be purchased by the Nation or Nation monitors? Are such purchases typically reimbursed through the monitoring contract? If there is a possibility that construction or pre-construction machine-aided testing will begin in the fall, we'd like to start the preparation process soon.

Thank you for your attention to these comments. We look forward to a final working session to finalize these details.

Sincerely,

Alma L. Lowry

Alma L. Lowry

cc: Council of Chiefs
Anthony Gonyea, Section 106 and NAGPRA Representative/Onondaga Nation
Tiffany Lee, Archaeological Consultant/Onondaga Nation
Joe Heath, General Counsel/Onondaga Nation
Jessica Prockup, NYS DOT
Jared Gross, FHWA
Tricia Millington, FHWA
David Clarke, FHWA