

Division of Historic Preservation & Archaeology 402 W. Washington Street, W274 Indianapolis, IN 46204-2739
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July 6, 2023

Craig Arnold
James R. Jones III, Ph.D.
Weintraut & Associates, Inc.
4649 Northwestern Drive
Zionsville, Indiana 46077

Federal Agency: U.S. Army Corps of Engineers

Re: Archaeological monitoring plan for the Henry Street Bridge Project within the old Greenlawn Cemetery (CR-49-6) in Marion County, Indiana (DHPA # 28221)

Dear Mr. Arnold and Dr. Jones:

Pursuant to Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108), 36 C.F.R. Part 800, and Indiana Code 14-21-1, the staff of the Indiana State Historic Preservation Officer (“Indiana SHPO”) has conducted an analysis the archaeological monitoring plan received by our office on June 14, 2023, for the above indicated project in Indianapolis, Center Township, Marion County, Indiana.

As previously recognized, portions of the project area lie within a cemetery that functioned from the early to late nineteenth century and numerous accidental discoveries of human remains have occurred in this area. The project area lies partially within the U.S. Army Corps of Engineers (“Corps”) Permit Area. Areas outside the Permit Area fall under the requirements outlined in IC-14-21-1-26.5. The project within the Corps Permit Area resulted in a Section 106 finding of Adverse Effect, and a Memorandum of Agreement (“MOA”) was executed on 11/2/2022 to resolve the effects of the undertaking subject to federal jurisdiction. We recognize that the City of Indianapolis has already approved a cemetery development plan (dated October 21, 2022) in accordance with IC-14-21-1-26.5. As Stipulation III. of the MOA and a requirement of IC-14-21-1-26.5(e), it is appropriate that an archaeological monitoring plan has been developed.

The methodology outlined in the monitoring plan is acceptable. However, we wish to clarify the areas that will require archaeological monitoring. We agree that monitoring will not be necessary during the demolition of structures that are above ground. Further, we agree that the areas identified have a high potential for encountering intact human remains and should be monitored:

- During demolition and removal of below grade footings, foundation walls, basements and subbasements, and subgrade floor slabs.
- During the removal and mitigation of existing subsurface utility lines or the installation of new lines associated with the Henry Street project.
- During the excavation of locations for new foundations or support piers.
- During the removal of all extant hard surfaces and during the excavation for the road footprint
- During any ground disturbances on the terrace slope of the White River

As stated in the plan, the potential exists for the accidental discovery of human remains, burial objects, grave goods or intact interments throughout the project footprint and we concur. While fill deposits of varying depths have been identified in the boring data, the origin of the fill is not documented. It is unclear if the fill deposits originated offsite (foreign) or represent onsite deposits that have been mixed. While intact burials or artifacts are unlikely to occur in infilled areas, disarticulated remains and/or disassociated artifacts have occurred in fill deposits that originated in mixed onsite contexts. Therefore, archaeological monitoring of all ground disturbing activities will be necessary until the archaeologist can assess the context of the infilled deposits. If it can be demonstrated that the fill deposits do not relate to the cemetery era, are of foreign origin, or

have otherwise been milled or so modified that human remains or artifacts would not be recoverable, then monitoring can be discontinued in that location.

Additionally, we note that should multiple intact graves be identified that suggest areas of the cemetery contain integrity, our office will need to be consulted on a plan for the systematic recovery of the remains. Monitoring is not a sufficient methodology to apply to the recovery and relocation of a historic cemetery.

The plan for archaeological monitoring is acceptable with the following conditions:

1. All archaeological investigations will be directly supervised in the field and laboratory by a qualified professional archaeologist who meets the qualification standards for a principal investigator or field or laboratory supervisor under 312 IAC 21. It is our understanding that Mr. Arnold or Dr. James R. Jones, III will be the Principal Investigator. We recognize that both have experience in historical archaeology and in the identification and recovery of human remains. If alternate staff will represent the qualified professional on site, please coordinate with our office prior to fieldwork.
2. The scientific investigations will conform to the current *Indiana Guidebook for Indiana Historic Sites and Structures Inventory—Archaeological Sites*. All human remains, artifacts and/or features will be recorded by GPS with submeter accuracy or in reference to a permanent datum.
3. Any proposed revisions to the plan must be submitted to the DHPA prior to implementation in the field.
4. If any human remains dating before December 31, 1939 are encountered, the discovery must be reported to the IDNR within two (2) business days. The discovery must be treated in accordance with IC 14-21-1 and 312 IAC 22. In that event, please call (317) 232-1646. The Marion County Coroner should also be contacted. If human remains are accidentally discovered during field investigations or related laboratory analyses and would be subject to the Native American Graves Repatriation Act (NAGPRA), the investigating or curation facility shall assure NAGPRA reporting and compliance.
5. All human remains will be temporarily housed in a secure location until a reburial location within a designated cemetery can take place.
6. Once the curation facility for non-burial materials has been determined, please notify our office.
7. A complete report must be submitted to the DHPA for review and comment within one (1) year of the completion of the fieldwork. In addition to the archaeological report, archaeological site forms will need to be submitted into SHAARD for any sites discovered.
8. We acknowledge that written landowner permission has been obtained to conduct fieldwork.
9. This plan is non-transferable.

With these conditions, the proposed plan is acceptable (#2023025). A copy of this letter, along with proper identification, should be carried by personnel in the field. This will ensure minimal confusion should they be requested to produce proper identification in the field by law enforcement personnel.

If you have any further questions regarding this matter, please contact the DHPA. Questions about archaeological issues should be directed to Beth McCord at (317) 232-3492 or bmccord@dnr.IN.gov. Additionally, in all future correspondence regarding the above indicated project, please refer to DHPA #28221.

Very truly yours,



Beth K. McCord
Deputy State Historic Preservation Officer
Director, Division of Historic Preservation and Archaeology

BKM:bkm

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