SECTION 6.4.1
HISTORIC AND CULTURAL RESOURCES

6.4.1.1 SECTION 106 REVIEW

As a Federally funded project requiring federal approval, the Project is subject to review under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulation, 36 CFR Part 800. The following subsections describe the steps undertaken in compliance with Section 106 review and consultation.

REGULATORY CONTEXT

Under Section 106, Federal agencies, including FHWA, are required to take into account the effects of their undertakings on historic properties and afford the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on such undertakings. A historic property is defined in 36 CFR Part 800.16(l)(1) as any prehistoric or historic district, site, building, structure or object included in, or eligible for inclusion in, the National Register of Historic Places (NR) maintained by the Secretary of the Interior. Consultation with the New York State Historic Preservation Officer (SHPO), Federally recognized Indian tribes, and other designated Consulting Parties is also required as part of the Section 106 process.

SECTION 106 PROCESS

The Section 106 process for the I-81 Viaduct Project included:

- The definition of the Area of Potential Effect (APE) for the build alternatives (Viaduct and Community Grid Alternatives);
- Identification of historic resources in the APE;
- Evaluation of effects on historic properties within the APE;
- Consideration of measures to avoid and minimize adverse effects caused by the Project on the resources within the APE;
- Documentation of an effect finding; and
- Consultation to resolve adverse effects.

INITIATION OF SECTION 106 PROCESS

FHWA issued a notice in the Federal Register on August 26, 2013, advising the public of the preparation of an EIS and initiating the Section 106 process. In a letter dated June 16, 2014, FHWA invited ACHP to participate in the process**.** The following meetings took place to initiate the project:

- June 27, 2014: Project Initiation Field Meeting with SHPO and FHWA

- June 24, 2015: Meeting with SHPO and FHWA to discuss existing conditions and Section 106 consultation in coordination with NEPA.
- September 23, 2015 Project Field Meeting

NYSDOT, on behalf of FHWA, sent a letter to the Onondaga Nation, the Federally recognized Native American that has cultural interests in the study areas for this Project. No other tribal interests were identified for lands within the Project Area.

Invitations to participate in Section 106 consultation were also extended to public agencies, preservation groups, and other stakeholders to invite them to participate as Consulting Parties. A public notice, in English and Spanish, was published in local newspapers to advise parties with a demonstrated interest that they could apply for Consulting Party status. Copies of *A Citizen's Guide to Section 106 Review,* published by the Advisory Council on Historic Preservation (ACHP), applications for Consulting Party status, and other information about the Section 106 process were available at the public meetings and project website. Through these means, parties expressed interest to serve as Consulting Parties.

FHWA and NYSDOT coordinated to identify, accept, and notify interested parties of their status as Section 106 Consulting Parties. In addition to the Onondaga Nation, representatives from thirteen organizations requested Consulting Party status and were approved by FHWA (see **Appendix E-5**, Correspondence). The list of Consulting Parties for the Project is appears in the Draft Finding Documentation, included in **Appendix E-3**. A Section 106 Consulting Parties meeting was held on June 29, 2016. Information presented to the Consulting Parties included the results of the historic and archaeological studies to date. The preliminary study areas were presented to the Consulting Parties and they were given an opportunity to provide information regarding known resources within the study area. Comments provided by the Consulting Parties were considered during the identification and evaluation of historic architectural resources.

The Section 106 review for this Project is being conducted in coordination with analyses conducted for the National Environmental Policy Act (NEPA). The Draft Finding Document (see **Appendix E-3**) includes a description of public involvement as it relates to public participation in Section 106 review for this project. Information concerning the assessment of effects on historic properties is being made available to the public by incorporating the Draft Finding Documentation in the Draft EIS. The public will be invited to submit comments at the public hearing and during the Draft EIS comment period (a minimum of 45 days), providing an opportunity for members of the public to express their views on the resolution of adverse effects in accordance with 36 CFR §800.6(a)(4). The public participation efforts being conducted for this Project are described in **Chapter 9, Agency Coordination and Public Outreach.**

IDENTIFICATION OF HISTORIC PROPERTIES

The Section 106 Exemption Regarding Effects to the Interstate Highway System (2005) relieves federal agencies of the requirement of taking into account the effects of their undertakings on the Interstate Highway System, except in regard to certain individual elements identified by the FHWA as exceptional in some way or meeting a national level of

significance. This exemption applies to the highways within the APE, I-81 and I-690, as elements of the Interstate Highway System that are not on the FHWA exclusion list. Therefore, the interstate highways within the APE are not considered historic properties for the purposes of Section 106 review.

Definition of the Area of Potential Effect

The Area of Potential Effects (APE) for the Project was established by NYSDOT and FHWA in consultation with the SHPO, in accordance with 36 CFR §800.4(a)(1), to incorporate "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 for the Project is based on the combined scope of work for both Build Alternatives under consideration, and it establishes the geographical scope of efforts for the identification of historic properties as follows:

- Archaeological resources within the APE associated with direct physical effects, and
- Architectural resources within the APE, including both direct and indirect effects.

FHWA and NYSDOT provided documentation illustrating and describing the APE to SHPO on September 6, 2016 (see **Appendix E-5)**. In a letter to NYSDOT dated September 27, SHPO concurred with the APE (see **Appendix E-5).**

Direct effects on architectural resources include demolition, alteration, or damage from construction—and indirect effects, such as the introduction of visual, audible, or atmospheric elements that may alter the characteristics of the historic property. As defined in 36 CFR 800.16(i), "Effect means an alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." Potential archaeological resources may be affected by construction activities resulting in disturbance to the ground surface (including buried ground surfaces) such as excavation, grading, pile-driving, cutting and filling, and staging.

The APE incorporates potential direct and indirect (visual and auditory) effects associated with the two alternatives currently under consideration. The existing topography and building heights have also been taken into consideration in the development of the APE. As distance and obstructions increase, the potential for adverse effects to a resource's setting due to visual and audible effects decreases. The APE includes areas that would have the most proximate and unobstructed views of the Project site and areas in which proposed project elements may alter the character or setting of historic properties.

Within the APE, a smaller area representing potential direct effects from physical alterations or ground disturbance associated with the Project has been identified. This area represents the combined limits of disturbance of the Viaduct and Community Grid Alternatives and includes the area in which their construction has the potential to result in direct effects to cultural resources.

The I-81 Viaduct Study Area is generally a dense urban environment characterized by buildings of varying height, scale, use, and style; surface streets and parking lots; pedestrian areas, public spaces, and sidewalks; and elevated interstate highway infrastructure (bridges

and ramps). The topography of the I-81 Viaduct Study Area ranges from relatively flat along the interstate corridors Downtown to more varied topography moving outward from the interstate corridors into surrounding neighborhoods. The I-481 South, I-481 East, and I-481 North Study Areas are less densely developed, with buildings typically one to three stories in height. The topography of the three outlying study areas is flat to moderately hilly.

The APE is illustrated and described in detail in a Documentation of APE memorandum included in the September 6, 2016 to SHPO noted above (see **Appendix E-5)**. The boundaries of the proposed APE are briefly summarized below. The Project has been divided into four areas including the I-81 Viaduct Study Area (the largest portion of the project site in Downtown Syracuse) and three outlying areas (the I-481 North, I-481 South, and I-481 East Study Areas) where interchange improvements would occur. The APE for the Viaduct Study Area is of variable width and extends approximately four miles, from East Colvin Street on the south to the Onondaga Lake Parkway's intersection with the City of Syracuse's municipal boundaries on the north. The Viaduct Study Area APE extends approximately two miles along I-690 from North Geddes Street on the west to Vine Street on the east. Three interchange areas that are not contiguous with the I-81 Viaduct Study Area described above include the I-481 South Study Area (the I-481/I-81 interchange south of Downtown Syracuse in the Outer Comstock area); the I-481 North Study Area (the I-481/I-81 interchange north of Syracuse in the Town of Cicero); and the I-481 East Study Area (the I-481/I-90 and the I-481/I-690 interchanges east of Syracuse in the Town of DeWitt). The APE for these three study areas includes only parcels that are in or adjacent to the project limits.

Archaeological Resources

A phased process is being used for the identification and evaluation of archaeological properties, pursuant to 36 CFR §800.4(b)(2). A Phase IA Archaeological Sensitivity Assessment for the APE was completed in September 2016 (see **Appendix E-2**). The purpose of the Phase IA Archaeological Sensitivity Assessment was to determine whether previously identified archaeological resources are located within the APE, and to evaluate the potential for previously unidentified archaeological resources to be located within the APE. The Phase IA study was conducted in accordance with established standards, including the New York Archaeological Council's (NYAC) *Standards for Cultural Resources Investigations and the Curation of Archaeological Collections in New York State* (NYAC 1994), the New York State Education Department's (NYSED) *Cultural Resources Survey Program Work Scope Specifications for Cultural Resources Investigations on New York State Department of Transportation Projects* (NYSED 2004), and the New York State Office of Parks, Recreation, and Historic Preservation's (NYSOPRHP) *Phase I Archaeological Report Format Requirements* (NYSOPRHP 2005). Per these standards and guidelines, the Phase IA report relies on background data and historical information specific to the project setting to assess the likelihood that archaeological resources are located in the APE. This includes detailed historic context narratives for the long period of Pre-Contact Native American settlement and use of the APE and vicinity, as well as descriptions of the settlement and development of the APE during the Historic Period. This site-specific historic context provides a foundation for the Section 106 evaluation of the potential for archaeological resources. The Phase IA also includes

documentation of the horizontal and vertical extent of prior ground disturbance within the APE, which effects the integrity of potential archaeological resources. The next steps in the phased approach to the identification of archaeological resources is to review the proposed locations of ground disturbance for the project and identify potential Phase IB archaeological testing methods (such as shovel testing, machine-aided excavation, and/or archaeological monitoring) that will be used in archaeologically sensitive areas where the proposed depth of ground disturbance exceeds the depth of existing ground disturbance.

The archaeological sensitivity assessment in the Phase IA evaluates the potential for archaeological sites to be located within the APE based on analysis of the following information:

- The environmental setting, geology, and soils within the APE and vicinity;
- Existing conditions within the APE, based on reconnaissance-level site visits and illustrated with representative photographs;
- The locations of previously identified archaeological sites located within and adjacent to the APE;
- The results of previous archaeological surveys and investigations within and adjacent to the APE; and
- Previous ground disturbance within the APE.

There are 14 previously recorded archaeological sites within or adjacent to the APE for direct effects. These include eight historic-period sites and six pre-contact Native American sites.

The APE is (for the most part) within a very developed urban area with a complicated history of prior ground disturbance that will affect the integrity of potential archaeological deposits. Sources of previous ground disturbance within the APE for direct effects include land filling activities associated with nineteenth-century urban development in the City of Syracuse; demolition and construction associated with mid-twentieth-century highway construction; disturbance associated with construction, expansion, or modification of buildings; areas of cut and fill associated with road and highway construction; and installation of underground utilities. The Phase IA report documents the extent of previous ground disturbance within the APE. This analysis includes consideration of mapped soils, buried utilities, demolished structures (as determined by geo-referencing historic maps and NYSDOT demolition/construction plans), GIS analysis of 955 soil borings to estimate depth of fill/disturbed soils within the APE, and identification of highway cut-and-fill embankment areas based on review of NYSDOT demolition and construction plans, aerial imagery (including oblique views and historical imagery), and field reconnaissance/confirmation.

Based on these data sources, the Phase IA includes an evaluation of the potential for the following types of archaeological resources to be located within the APE:

- Pre-Contact Native American Archaeological Senility:
- Historic-Period Archaeological Sensitivity:
  - Contact and Colonial Period Native American Archaeological Sensitivity;
  - Erie and Oswego Canal-Related Archaeological Sensitivity;
  - Potential for Large-Scale Commercial, Industrial, and Institutional Archaeological Sites;
  - Potential for Residential and Small-Scale Commercial Archaeological Sites;
  - Military Sites Archaeological Sensitivity;
- Potential for Human Remains and Cemeteries:
  - Potential for Native American Human Remains; and
  - Cemeteries.

The extent of previous disturbance in many areas within the APE for direct effects limits the potential for archaeological resources to be present. Potential Pre-Contact Native American archaeological sites within the APE would necessarily pre-date the significant filling and engineering of the landscape that took place as part of the development of the City of Syracuse throughout the nineteenth and twentieth centuries. Therefore, potential Native American archaeological sites are anticipated to be located only in areas with undisturbed soils. Potential historic-period archaeological resources in the APE include sites and features related to the Erie and Oswego Canals; large-scale commercial, industrial, and institutional sites; residential and small-scale commercial sites; and military sites (although none of the latter are known to be located within the project limits). As described in the Phase IA report, approximately 19.1 acres within the APE for direct effects is undisturbed, or disturbance cannot be documented, and therefore potentially sensitive for Native American archaeological resources. There is a potential for historic-period archaeological resources to be located throughout portions of the APE for direct effects; however, the APE is mostly within a heavily disturbed highway corridor.

Based on the results of the research conducted as part of the Phase IA Archaeological Sensitivity Assessment and through consultation with the Onondaga Nation, there is a potential for human remains to be located (or to be formerly located) within the APE. Historical accounts described Native American human remains that were disturbed during nineteenth-century construction activities in one location with the APE. In addition, three historic-period cemeteries (one of these is the former site of a relocated cemetery) are located adjacent to (but outside) the APE. These include the NR-listed Oakwood Cemetery, the former site of Old St. Mary's Cemetery, and the House Family Cemetery. No disturbance to any of these three cemeteries is anticipated as part of the Project.

The Phase IA Archaeological Sensitivity Assessment was completed in consultation with the SHPO and the Onondaga Nation, and the report was provided for their review in advance of developing a scope of work for Phase IB archaeological survey. The SHPO concurred

with the recommendation for Phase IB testing in a letter dated September 22, 2016 (see **Appendix E-5).**

A scope of work for archaeological investigations is being developed in accordance with established standards for Phase IB archaeological surveys, in consultation with the SHPO and Onondaga Nation. The Phase 1B archaeological work plan will be incorporated as an appendix to the Draft MOA for the Project.

The schedule and timing of the Phase 1B archaeological field investigations, particularly in areas where the removal of pavement and other machine-aided testing will be necessary, will be coordinated to minimize multiple episodes of soil disturbance and disruption of existing land uses. It is anticipated that archaeological monitoring during construction will be restricted to those areas where removal of pavement in advance of construction is not feasible (such as within active roadways).

Architectural Resources

Architectural resources in the APE were identified in consultation with the SHPO and other Consulting Parties, and documented in an Architectural Resources Survey prepared in accordance with New York State Education Department's (NYSED's) *Cultural Resources Survey Program Work Scope Specifications for Cultural Resources Investigations on New York State Department of Transportation Projects* (NYSED, 2004). The Architectural Resources Survey is included in **Appendix E-1**). Information on properties previously evaluated for NR eligibility were collected from SHPO's online Cultural Resource Information Systems (CRIS) database. Properties that were previously determined Eligible, Not Eligible, or listed in the NR were compiled, tabulated, and mapped.

Subsequent to the inventory of previous evaluated properties, architectural historians meeting the National Park Service (NPS) Professional Qualification Standards for Architectural History (36 CFR Part 61) conducted field surveys within the APE to inventory and evaluate previously unevaluated properties over 50 years in age. Properties over 50 years old in the APE were photographed and evaluated for the NR according to the *Criteria for Evaluation*, which are found in 36 CFR Part 60.4. Information collected during the field survey was supplemented by research, including consultation with local historical societies, local libraries, municipal historians, and historic preservation organizations to gather data on historic resources in the APE. Properties currently designated as City of Syracuse Landmarks and properties determined eligible for such listing were inventoried for reference only. Research was conducted at multiple repositories in Syracuse as well as online. Comments and information provided by Consulting Parties were considered as part of the identification of architectural resources.

NYSDOT consulted with SHPO for review of the documents prepared as part of the evaluation of architectural resources in addition to subsequent consultation to finalize the identification of historic resources. The final list of NR listed and eligible properties identified in the APE is documented in correspondence between NYSDOT and SHPO **(see Appendix E-5).**

Three historic districts and 88 individually NR-listed or eligible properties are located within the APE **[CONFIRM]**. Information regarding these architectural resources is provided in the Architectural Resources Survey (**Appendix E-1**) and summarized in the Draft Finding Documentation (**Appendix E-3**). The locations of the properties are also identified in Figure 2 of Attachment A of the Finding Document (see **Appendix E-3**).

EVALUATION OF EFFECTS

Archaeological Resources

In accordance with 36 CFR §800.5(a)(3), a phased process is being used to evaluate the Project's effects on archaeological resources, consistent with the phased process for identification and evaluation (36 CFR §800.4(b)(2)). The NYSDOT in coordination with the FHWA will provide information and carry out consultation with the SHPO to determine the eligibility of any archaeological resources encountered as a result of Phase IB field investigations. In addition, the FHWA in coordination with the NYSDOT will provide the same information and consult with the Onondaga Nation to seek their opinion regarding any Native American or Precontact period resources. Any archaeological resource identified during field investigations in advance of construction, as a result of archaeological monitoring during construction, or as an unanticipated discovery during construction will be the subject of consultation to consider measures that would avoid, minimize, or mitigate adverse effects on the site.

Architectural Resources

As noted above, three historic districts and 88 individually NR-listed or eligible properties are located within the APE **[CONFIRM].** The assessment of effects is documented in the Draft Finding Documentation; Table 1 of that document (see **Appendix E-3**) lists each of these resources and describes the proposed changes under each alternative.

Under the Viaduct Alternative, adverse effects would result from the proposed demolition and removal of ten (10) historic architectural properties. These include:

- The North Salina Street Historic District (HD-2). Two contributing resources, the Britton Block at 319-325 North Salina Street and the Learbury Center at 329 North Salina Street, would be removed;
- The New York Central Railroad Passenger & Freight Station complex at 400 Burnet Avenue and 515 Erie Boulevard East (Building 11) would be directly affected by the removal of the freight station, one of the buildings that contributes to the complex;
- The Veteran's Fastener Supply Corp. building at 117 Butternut Street (Building 15) would be removed;
- Smith Restaurant Supply at 500 Erie Boulevard (Building 24) would be removed;
- Peck Hall and Reid Hall at 601 Genesee Street East (Building 36) would be removed;
- The Syracuse Herald Building at 212 Herald Place (Building 45);

- 471-81 Oswego Boulevard (aka 1 Webster's Landing or VIP Structures) (Building 52) would be removed;
- Wag Foods at 909 North State Street (Building 72) would be removed;
- 105-109 S. Townsend Street including 105 S. Townsend Street (aka 500 Water Street)(Building 76), which would be removed; and 107-109 S. Townsend Street (Phoenix Foundry) (Building 77), whose second-story walkway connecting to 105 S. Townsend Street would be removed;
- 123-129 Willow Street East (the Howard & Jennings Pump Factory) (Building 88) would be removed.

Under the Community Grid Alternative, adverse effects would result from the proposed demolition and removal of two historic properties. These include:

- The North Salina Street Historic District and Boundary Expansion (HD-2). One contributing resource, the Learbury Center at 329 North Salina Street, would be removed; and
- The Veteran's Fastener Supply Corp. building at 117 Butternut Street (Building 15), which would be removed.

FHWA in coordination with NYSDOT, and in consultation with the SHPO, has applied the Criteria of Adverse Effect (36 CFR 800.5(a)(1)) to identified historic properties within the APE, and finds the Project will have an Adverse Effect under both the Community Grid and Viaduct Alternatives due to the unavoidable effects associated with the proposed removal and demolition of architectural resources. Regardless of the presence or absence of archaeological resources within the APE, the Project as a whole will have an Adverse Effect on historic properties, due to the known effects on architectural resources under both Build Alternatives.

RESOLUTION OF ADVERSE EFFECTS

Section 106 Consulting Parties are being provided a package of Section 106 materials, including this Finding Documentation, as an opportunity to review and comment on the evaluation of effects, including measures to avoid, minimize, or mitigate adverse effects on historic properties.

- The APE Documentation Memorandum;
- Architectural Resources Survey;
- Phase IA Archaeological Sensitivity Assessment;
- Finding Documentation Report;
- Draft MOA; and
- Associated Agency Correspondence.

The Draft MOA (see **Appendix E-4**) proposes measures to mitigate the Project's adverse effects on historic properties. These measures are subject to change based on continuing consultation among the FHWA, NYSDOT, SHPO, and other Consulting Parties. Potential mitigation includes traditional measures such as the documentation of adversely affected properties following Historic American Building Survey (HABS) standards. Additional mitigation could take the form of historic interpretive signage along the Onondaga Creekwalk, which would be extended as part of the Project, or within the newly created Canal District near the James Street interchange under the Community Grid Alternative.

The Draft MOA will include stipulations to complete the identification and evaluation of archaeological resources, in accordance with an approved Phase IB work plan. In addition, the Draft MOA will include a consultation protocol to consider measures to avoid, minimize, or mitigate adverse effects on archaeological properties identified as a result of the implementation of the Phase IB work plan.

6.4.1.2 NO BUILD ALTERNATIVE

The No Build Alternative would not affect historic resources as no Project-related disturbances or property acquisitions would occur.

6.4.1.3 ENVIRONMENTAL CONSEQUENCES OF THE VIADUCT ALTERNATIVE

The effects discussed in the sections that follow were identified as part of the Section 106 process described above and are not in addition to the information described above. The Project as a whole will have one effect (an adverse effect) on historic properties.

PERMANENT/OPERATIONAL EFFECTS

Construction of the Viaduct Alternative would involve ground disturbance, which has the potential to disturb archaeological resources. The presence or absence of archaeological resources will be determined through Phase IB testing and additional field investigations as needed to evaluate National Register eligibility in consultation with the SHPO and Onondaga Nations (for Native American sites). If eligible sites are identified, the FHWA in coordination with NYSDOT will carry out consultation with the SHPO and the Onondaga Nation to consider measures that would avoid, minimize, or mitigate adverse effects on the integrity of the archaeological property.

The Viaduct Alternative would result in the demolition of 24 buildings that would need to be acquired for the construction of the Viaduct Alternative. Ten (10) of the 24 structures that would be removed are NR resources, and as such, the Project would have an adverse effect on historic resources.

CONSTRUCTION EFFECTS

No temporary construction-period impacts to historic properties were identified. Changes in traffic and noise during construction would not alter the characteristics of the historic properties that qualify them for the NR in a manner that would constitute an adverse effect.

In accordance with standard construction management practices, measures will be developed and implemented to protect certain properties (to be determined) from vibration, excavation, and potential damage from heavy equipment during construction. As design advances, specific properties will be identified based on potential risks associated with construction activities. SHPO will be afforded the opportunity to review these protective measures before construction commences.

INDIRECT EFFECTS

As discussed in the Finding Document (see **Appendix E-3**), the Viaduct Alternative would result in changes of varying magnitude to the setting of architectural resources within the APE, but these changes would not alter the qualifying characteristics of these properties. In many cases, the setting of historic properties within the APE would be changed somewhat by proposed Project elements under the Viaduct Alternative, such as the reconstruction of the I-690 and I-81 viaducts at higher elevations, reconstruction of bridges, and construction or alteration of ramps. However, in general, the existing setting of the historic properties already includes proximate views of comparable transportation infrastructure. Thus, the Viaduct Alternative would not result in adverse indirect effects on historic resources.

CUMULATIVE EFFECTS

The initial construction of the existing highway viaducts in the APE in the middle of the twentieth century resulted in the demolition of numerous buildings and divisions and changes in the character of many of the neighborhoods in the APE. As described in **Section 6.2.1, Land Use**, a number of developments are planned or ongoing in the vicinity of the APE. The majority of planned developments within the I-81 Viaduct Study Area are residential and mixed use residential structures located in two clusters—Downtown and University Hill—several blocks from the elevated highway. This pattern is likely to continue given existing market demand is for pedestrian-oriented, mixed use neighborhoods. None of the known concurrent or planned developments would result in substantial changes to historic districts or individual historic properties in the APE for this Project. Historic Preservation regulations are in place that require agencies to consider the effects of their undertakings on cultural resources.

Under the Viaduct Alternative, elevated highway infrastructure would continue to impede views and noise would continue. Although bicycle and pedestrian improvements included in the Viaduct Alternative, combined with those planned by the City of Syracuse, would improve connections between neighborhoods on either side of the highway, the replacement viaduct would continue to be a physical and visual barrier. However, the Viaduct Alternative would not change or further divide neighborhoods.

As described above, the Viaduct Alternative would have an adverse effect on the North Salina Street Historic District due to the proposed demolition of two contributing properties within that Historic District and would adversely affect other historic properties. Because none of the planned or concurrent projects would result in additional substantial changes to resources within or setting of the North Salina Street Historic District or other properties in

the APE for this project, there would not be an adverse cumulative impact as a result of the Viaduct Alternative.

MITIGATION

With respect to archaeological resources, as described in the Finding Documentation (see **Appendix E-3),** the identification, avoidance, minimization of impacts, and/or mitigation of impacts to archaeological resources will continue under a phased approach prior to the initiation of construction for the Project. The Phase 1B work and other stipulations related to the avoidance, minimization, or mitigation of adverse effects on archaeological resources is described in the Draft MOA (see **Appendix E-4**).

With respect to architectural resources, NYSDOT and its project team have worked to minimize and avoid adverse effects through an examination of design requirements and refinements to roadway alignments. In some cases, it was possible to avoid the historic structures, although a portion of the undeveloped portion of the property was required. In other cases, it was possible to avoid the property altogether. As such, NYSDOT and its project team were able to refine its design for the Viaduct Alternative and eliminate potential adverse effects to certain historic properties. (Refer to **Chapter 3, Alternatives** for more information about design refinements during alternatives development.)

The Draft MOA (see **Appendix E-4**) proposes measures to mitigate the Project's adverse effects on historic properties. These measures are subject to change based on continuing consultation among the FHWA, NYSDOT, SHPO, and other Consulting Parties. Potential mitigation includes traditional measures such as the documentation of adversely affected properties following Historic American Building Survey (HABS) standards. Additional mitigation could take the form of historic interpretive signage along the Onondaga Creekwalk, which would be extended as part of the Project.

6.4.1.4 ENVIRONMENTAL CONSEQUENCES OF THE COMMUNITY GRID ALTERNATIVE

PERMANENT/OPERATIONAL EFFECTS

Construction of the Community Grid Alternative would involve ground disturbance, which has the potential to disturb archaeological resources. The presence or absence of archaeological resources will be determined through Phase IB testing and additional field investigations as needed to evaluate National Register eligibility in consultation with the SHPO and Onondaga Nations (for Native American sites). If eligible sites are identified, the FHWA in coordination with NYSDOT will carry out consultation with the SHPO and the Onondaga Nation to consider measures that would avoid, minimize, or mitigate adverse effects on the integrity of the archaeological property.

Under the Community Grid Alternative, an adverse effect would result from the proposed demolition of two architectural properties.

CONSTRUCTION EFFECTS

No temporary construction-period impacts to historic properties were identified. Changes in traffic and noise under the Community Grid Alternative would not alter the characteristics of the historic properties that qualify them for the NR in a manner that would constitute an adverse effect.

In accordance with standard construction management practices, measures will be developed and implemented to protect certain properties (to be determined) from vibration, excavation, and potential damage from heavy equipment during construction. As design advances, specific properties will be identified based on potential risks associated with construction activities. SHPO will be afforded the opportunity to review these protective measures before construction commences.

INDIRECT EFFECTS

As discussed in the Finding Document (see **Appendix E-3**), the Community Grid Alternative would result in changes of varying magnitude to the setting of architectural resources within the APE, but these changes would not alter the qualifying characteristics of these properties. In many cases, the setting of historic properties within the APE would be changed somewhat by proposed Project elements under the Community Grid Alternative, such as the reconstruction of the I-690 at a higher elevation, reconstruction of bridges, and construction or alteration of ramps. However, in general, the existing setting of the historic properties already includes proximate views of comparable transportation infrastructure. Thus, the Community Grid Alternative would not result in adverse indirect effects on historic resources, and in some cases, the Community Grid Alternative would have a beneficial effect by removing the existing I-81 viaduct from the setting.

CUMULATIVE EFFECTS

The initial construction of the existing highway viaducts in the APE in the middle of the twentieth century resulted in the demolition of numerous buildings and divisions and changes in the character of many of the neighborhoods in the APE. As described in **6.2.1, Land Use**, a number of developments are planned or ongoing in the vicinity of the APE. None of the known concurrent or planned developments would result in substantial changes to historic districts or individual historic properties in the APE. The majority of planned developments within the I-81 Viaduct Study Area are residential and mixed use residential structures located in two clusters—Downtown and University Hill—several blocks from the elevated highway. This pattern is likely to continue given existing market demand is for pedestrian-oriented, mixed use neighborhoods. None of the known concurrent or planned developments would result in substantial changes to Historic Districts or individual historic properties in the APE. Historic Preservation regulations are in place that require agencies to consider the effects of their undertakings on cultural resources.

The Community Grid Alternative could produce benefits to buildings and neighborhoods in the APE by improving connections between existing neighborhoods and removing a physical barrier that was introduced when the highways in the APE were constructed.

Therefore, there would not be a measurable cumulative impact beyond those identified as part of the Community Grid Alternative.

MITIGATION

With respect to archaeological resources, as described in the draft Section 106 Effect Finding Documentation (see **Appendix E-3),** the identification, avoidance, minimization of impacts, and/or mitigation of impacts to archaeological resources will continue under a phased approach prior to the initiation of construction for the Project.

With respect to architectural resources, NYSDOT and its project team have worked to minimize and avoid adverse effects through an examination of design requirements and refinements to roadway alignments. In some cases, it was possible to avoid the historic structures, although a portion of the undeveloped portion of the property was required. In other cases, it was possible to avoid the property altogether. Furthermore, the Community Grid Alternative would avoid many of the impacts of other alternatives that have been explored for the I-81 Viaduct Project.

The Draft MOA (see **Appendix E-4**) proposes measures to mitigate the Project's adverse effects on historic properties. These measures are subject to change based on continuing consultation among the FHWA, NYSDOT, SHPO, and other Consulting Parties. Potential mitigation includes traditional measures such as the documentation of adversely affected properties following Historic American Building Survey (HABS) standards. Additional mitigation could take the form of historic interpretive signage along the Onondaga Creekwalk and within the Canal District near the James Street interchange, both of which would be enhancements created as part of the Community Grid Alternative.