

# Appendix E

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## SECTION 106 CONSULTATION



NEBRASKA STATE HISTORICAL SOCIETY

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February 1, 2001

Mr. Edward Kosola  
Federal Highway Administration-Nebraska Division  
Federal Building, Room 220  
100 Centennial Mall North  
Lincoln, NE 68508

RE: Lincoln South and East Beltways- Draft *Defining Boundaries of NRHP-Eligible Properties Located Within the South and East Beltway Study Area* (October 31, 2000)

Dear Mr. Kosola:

We have reviewed the referenced draft report, which has incorporated our comments on the draft dated October 17, 2000. We concur with the findings and editorial changes made for the October 31 2000 report.

We believe that this letter, along with our November 27, 2000 letter, should make our comments on all materials related to the Preliminary Draft Environmental Impact Statement (November 13, 2000) up to date. Please let us know if you disagree.

Thank you once again for the opportunity to comment on these documents. If you have any questions, please call Bill Callahan at 471-4788.

Sincerely,

L. Robert Puschendorf  
Deputy State Historic Preservation Officer  
Nebraska State Historic Preservation Office

Cc: Roger Figard  
Cindy Veys  
Ed Zimmer  
Amy Zlotzky



NEBRASKA STATE HISTORICAL SOCIETY

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November 27, 2000

Mr. Edward Kosola  
Federal Highway Administration-Nebraska Division  
Federal Building, Room 220  
100 Centennial Mall North  
Lincoln, NE 68508

RE: Lincoln South and East Beltways- Draft *Defining Boundaries of NRHP-Eligible Properties Located Within the South and East Beltway Study Area* (October 17, 2000)

*Draft Assessment of Adverse Effects to NRHP and NRHP-Eligible Sites, Lincoln South and East Beltways Study, Lincoln, Nebraska* (October, 2000)

*Preliminary Draft Environmental Impact Statement and 4(f) Statement-South and East Beltways, Lincoln, NE* (November 13, 2000)

Dear Mr. Kosola:

We have reviewed the referenced draft reports which follow up on comments received by consulting parties in response to the *Preliminary Assessment of Adverse Effects* dated December, 1999. We have recently provided Olsson Environmental Sciences with editorial comments on the *Defining Boundaries* report. These comments are not substantive in terms of the report's findings however, hopefully, they will clarify some of the more arcane National Register evaluation issues.

We understand the *Defining Boundaries* report to be an addendum to the various cultural resources survey reports that have been provided to us and to which we have concurred upon over the past three years. We believe an accounting of the reports produced to identify historic properties for the Beltways project includes:

- *Lincoln South and East Beltways Historic Survey Report* (Elliott and Dirr, 1998)
- *Evaluation of the Hulda Otto House for Eligibility to the National Register Of Historic Places* (Stupka-Burda, 1999. This report includes, in addition to the Otto House, evaluations of the Guenzel Farmstead and the Wunibald Farmstead)
- *Archeological Inventory and Evaluation of Lincoln's South and East Beltway: Investigation Along the Southern Route SM-4, Lancaster County, Nebraska* (Parks and Stupka-Burda, January, 1998)

- *Archeological Inventory and Evaluation of Lincoln's South and East Beltway: Investigation and Testing Along the Eastern Routes EF-1, EM-1, EC-1. Lancaster County, Nebraska* (Parks and Stupka-Burda, November 1998)
- *Archeological Inventory and Testing of Lincoln's South and East Beltway Alternatives SM-4, EC-1, EM-1 and EF-1 Lancaster County Nebraska*, (Parks and Stupka-Burda, 2000).

After taking into account all the documentation provided and after careful review of the draft *Defining Boundaries* report, we concur with the findings therein. In addition, we have been provided copies of memos from UN-L (Stupka-Burda) to Olsson Environmental Sciences (Zlotsky) dated 9/19/00, 10/13/00 and 10/17/00. These memos clarify and reevaluate previous assessments made by Parks/Stupka-Burda and Elliot/Dirr on archeological properties and standing structures. The clarifications and reevaluations were made in accordance with comments and inquiries from consulting parties, and we concur with both memo's findings.

After taking into account the findings of the additional documentation provided in the *Defining Boundaries* report and the UN-L memos, we concur with the findings of the October, 2000 draft *Assessment of Adverse Effects*.

Our concurrence with these findings is given with the understanding that our edits on the draft *Defining Boundaries* report will be taken into account when the final draft is produced.

Finally, we appreciate the opportunity to review and comment upon the Preliminary Draft Environmental Impact Statement (PDEIS). We understand this document to be a work in progress, and is for internal review only.

In Appendix E we notice that copies of our letters dated June 10 1997 and July 22 1997 to the City of Lincoln have been omitted. In order to reflect an accurate synopsis of Section 106 consultation, we believe those letters should be made part of the public record. Similarly, in Appendix F we note that the October 13, 2000 UN-L memo to Olsson Environment Sciences referenced above has been omitted, and should be included in this appendix.

We concur with the findings of the main body of the PDEIS (current Section 3.23) and, with the exception of comments above as appropriate, we concur with the findings of the appendices as they relate to Section 106 consultation.

Thank you once again for the opportunity to comment on these documents. If you have any questions, please call Bill Callahan at 471-4788.

Sincerely,



L. Robert Puschendorf  
Deputy State Historic Preservation Officer  
Nebraska State Historic Preservation Office

Cc: Roger Figard  
Cindy Veys  
Ed Zimmer  
Amy Zlotsky



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

100 Centennial Mall North, Room 220  
Lincoln, NE 68508-3851  
Nebraska.FHWA@FHWA.DOT.GOV

November 14, 2000

NEBRASKA DIVISION FHWA

In Reply Refer To:  
HRW-NE

Mr. Robert Puschendorf  
Deputy State Historic Preservation Officer  
Nebraska State Historical Society  
P. O. Box 82554  
Lincoln, NE 68501

Dear Mr. Puschendorf:

**Preliminary Draft Environmental Impact Statement (DEIS) - South and East Beltway,  
Lincoln - Project DPU-3300(1)**

Attached is a copy of the Preliminary DEIS for the subject project. We are attaching a copy of the letter we sent to various other state and Federal agencies requesting their concurrence in the alternatives carried forward.

We would like your early review of the Preliminary DEIS so that we can proceed toward completion and circulation of a DEIS. If you have any questions please contact me at 437-5973. We appreciate the time and effort you and your staff have the invested in this project to date.

Sincerely yours,

Edward W. Kosola  
Environmental/Realty Officer

Enclosures

cc: Len Sand, Nebraska Department of Roads  
Amy Zlotzky, Olsson Associates



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

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SEP 27 2000

Nebraska Division Office  
Federal Building, Room 220  
100 Centennial Mall North  
Lincoln, NE 68508-3851  
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September 26, 2000

OCT 12 2000

copy to  
Sand  
+ Zlotzky  
10-19-00

NEBRASKA DIVISION

Mr. Robert Puschendorf  
State Historic Preservation Office  
Nebraska State Historical Society  
P.O. Box 82554  
Lincoln, Nebraska 68501-2554

In Reply Refer To:  
HRW-NE

Dear Mr. Puschendorf:

0009-077-01

**Concurrence on No Adverse Effect with conditions  
for NRHP-Eligible Site: LC00: E-118 (Road Sign at 112<sup>th</sup> and Adams)  
DPU-3300(1) South and East Beltways Study, Lincoln, Nebraska**

In compliance with Section 106 of the National Historic Preservation Act, the Federal Highway Administration identified 34 sites in the Lincoln South and East Beltways Study area which are either listed in or eligible for listing in the National Register of Historic Places and the SHPO has concurred upon their eligibility. A concrete directional road sign located at 112<sup>th</sup> and Adams (LC00: E-118) was one property the SHPO and FHWA agreed was eligible.

During the assessment of adverse effects for the beltway project, it was determined that LC00: E-118 would not be adversely affected by the Beltway project if the following conditions are met:

If either alternative EM-1 or EF-1 is selected as the preferred alternative, LC00:E118 will be protected from damage during construction of the Beltway and repaving and upgrade of Adams Street.

Additionally, in consultation with the SHPO, LC00:E-118 will be repositioned about 20 feet from the upgraded road and as near its current location as is practicable (assuming the County roads have not been upgraded prior to beltway construction). These conditions will be incorporated into the Draft Environmental Impact Statement and Draft 4(f) Statement for the project.

Because the historic boundaries of the road signs have been recommended as a 5-foot radius around the sign, the beltway alternatives will require incorporation of land from a historic property and must therefore be addressed in the Draft 4(f) Statement.

We are requesting your concurrence that implementing the conditions described will result in "no adverse effects" to the historic property LC00:E-118.

Sincerely yours,

Edward W. Kosola  
Realty/Environmental Officer

cc:  
Amy Zlotzky, OES  
Jim Linderholm, HWS  
Roger Figard, City of Lincoln  
Len Sand, NDOR

**CONCUR**

DEPUTY STATE HISTORIC PRESERVATION OFFICER

DATE: 10/5/00



**NEBRASKA STATE HISTORICAL SOCIETY**

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June 2, 2000

Mr. Ed Kosola  
Federal Highway Administration-Nebraska Division  
Federal Building, Room 220, 100 Centennial Mall North  
Lincoln, NE 68508

RE: Review of Final Archeological report, South and East Beltways (Parks, Stupka-Burda-Jan. 2000)

Dear Mr. Kosola:

We have reviewed the referenced document, which included additional testing of sites and geomorphological testing requested by our office. We apologize as, although the SHPO archeologist responded verbally and in memo form in February, we have yet to respond to the report's findings in writing. We trust our late response will cause a minimum of inconvenience.

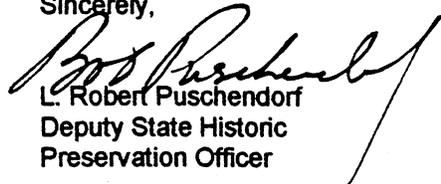
We concur with the findings of the report, as follows:

We agree that archeological sites 25LC115, 25LC143, 25LC144, 25LC157, 25LC158 and 25LC160 are not eligible for listing on the National Register of Historic Places. We agree that 25LC147 is eligible for listing on the National Register under criterion D. We note that 25LC159 was not further investigated, as it falls outside the project APE. All other sites within the report have previously been reviewed and commented upon by our office.

The report's upland sample indicates that there is low probability of significant sites being found in this topographic situation. Therefore, further survey is not recommended for upland areas of the final project route. However, the report points out that there remain some areas, due to landowner permission problems, that were not surveyed. We recommend that any areas of the final selected route that cross stream courses which have not been surveyed be surveyed for archeological resources. This should include the report's recommended subsurface testing in Trench areas 3 and 6, if the project includes these areas in the final route selection. We also concur with the report's recommendation that all future borrow areas be surveyed as appropriate. Finally, we once again reiterate the need for the development and implementation of a monitoring and contingency plan for on-site monitoring during construction.

If you have any questions, please do not hesitate to call me at 471-4788.

Sincerely,



L. Robert Puschendorf  
Deputy State Historic  
Preservation Officer

Cc: Amy Zlotzky  
Cindy Veys  
Roger Figard  
Ed Zimmer



U.S. Department  
of Transportation

**Federal Highway  
Administration**

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**OCT 08 1999**

**JLSSON ASSOCIATES**

Nebraska Division Office  
Federal Building, Room 220  
100 Centennial Mall North  
Lincoln, NE 68508-3851  
Nebraska.FHWA@FHWA.DOT.GOV

October 7, 1999

In Reply Refer To:  
HRW-NE

NEBRASKA DIVISION

Mr. Bob Puchendorf  
State Historic Preservation Office  
Nebraska State Historical Society  
P.O. Box 82554  
Lincoln, NE 68501-2554

Dear Mr. Puchendorf:

Concurrence on Historic Properties  
South and East Beltway Study, Lincoln, Nebraska

In compliance with Section 106 of the National Historic Preservation Act, the Federal Highway Administration has identified 34 sites in the Lincoln South and East Beltways Study area which are either on or eligible for listing on the National Register of Historic Places (see attached Table 1). This list of sites is based on the recommendations of the Historic Survey Report, Archeological Evaluation, and supplemental investigations requested by the State Historic Preservation Office (SHPO) for this project. These include 30 historic and four (4) archeological sites. Your office has already concurred with the recommendations of eligibility found in these reports (letters dated 3 June 1998, 11 June 1998, 7 December 1998, and 7 September 1999).

Based on our determination, these 34 sites will be evaluated for adverse effects as part of the Section 106 consultation for the Lincoln South and East Beltways Study.

Sincerely yours,

Edward W. Kosola  
Realty Officer

Attachment

cc:  
Amy Zlotsky, OES  
Jim Linderholm, HWS  
Roger Figard, City of Lincoln  
Len Sand, NDOR  
Cindy Veys, NDOR

**Table 1**  
**LIST OF SITES ON OR ELIGIBLE FOR**  
**THE NATIONAL REGISTER OF HISTORIC PLACES**  
**Lincoln South and East Beltways Study**

**FARMYARDS**

LC00: S-15	Del O'Brien Farmyard
LC00: S-143	Henry Wunibald Farmstead
LC00: E-52	Steve Johnson Farmyard
LC00: E-53	Penterman Farmyard, "Penterman Farm"
LC00: E-56	Michael Smith Farmyard
LC00: E-61	Elaine and Owen Herter Farmyard
LC00: E-62	Joel and Kathy Sartore Farm, "Herter's-Hagaman Farm"
LC00: E-69	Arthur Monahan Farmyard, "Haeger Dairy"
LC00: E-72	Lyle and Maveme Mayer Farmyard
LC00: E-87	Theresa Retzlaff Farmyard, "Forest Brook Farm"
LC00: E-88	Stevens Creek Stock Farm, Mardale Farm
LC00: E-134	Laura Reed Farmyard, "Reed Homestead"

**BARNES**

LC00: S-6	David McEwen Gable Roof Barn
LC00: S-31	Steve Speidel Gothic Arch Roof Laminated Truss Barn
LC00: S-47	Margene Zachek Gable Roof Connected Barn
LC00: S-127	Ehler's Round Barn
LC00: E-57	Elton Haase Gable Roof Mortise and Peg Barn, "Haase Farm"
LC00: E-67	Shirley Retzlaff Gable Roofed Banked Barn and Silos, "Retzlaff Farm"
LC00: E-102	Donna Keane Gambrel Roof Barn, "Kettlehut Farm"
LC00: E-132	Lynn Lenhoff Gambrel Roof Concrete Block Barn

**RESIDENCES**

LC00: S-23	Forest Nicely Residence, "Jensen Homeplace"
LC00: E-81	Chuck Hobka Residence, "Jacoby Homestead"
LC00: E-99	Norma and Bob Lemke Residence, "Karl Lemke Farm"
LC00: E-141	William Fagen Residence, "Fagen's Acres"

**SCHOOL**

LC00: S-41	"Cheney School"
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**GRAIN ELEVATORS**

LC00: S-40	Circle 4 Feed and Grain Elevator, Cheney
LC00: E-106	Farmers Coop Grain Elevator, Walton

**ROAD SIGNS**

LC00: S-42	Road Sign at 1 <sup>st</sup> and 91 <sup>st</sup> , Cheney
LC00: S-135	Road Sign at Saltillo and 56 <sup>th</sup>
LC00: E-118	Road Sign at 112 <sup>th</sup> and Adams

**ARCHEOLOGICAL SITES**

25LC1	Schrader Site--Small Late Prehistoric Village, Smokey Hill Phase
25LC125	Lithic Scatter
25LC129	Lithic and Ceramic Scatter
25LC147	Euroamerican Trail, ca. 1850-1880

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OLSSON ASSOCIATES



NEBRASKA STATE HISTORICAL SOCIETY  
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September 7, 1999

Edward Kosola-Realty Officer  
Federal Highways Administration  
100 Centennial Mall North, Rm. 220  
Lincoln NE 68508-3851

RE: South and East Lincoln beltways, additional evaluation for NRHP eligibility:  
Hulda Otto House; John Guenzel Farmstead; Wunibald Farmstead

Dear Mr. Kosola:

We have reviewed additional documentation provided by the City for the referenced properties, and have visually inspected all three. We concur with the findings of the City's report. In our opinion, the Hulda Otto house is not significantly associated with any person, event or pattern of events that may make it eligible for listing on the National Register. Additionally, in our opinion, the Otto house does not embody the distinctive characteristics of a construction type, period or method of construction nor does it retain sufficient physical historic integrity to allow consideration of Register eligibility for design or construction.

The Guenzel Farmstead, in our opinion, is not a good candidate for listing on the Register for reasons identical to the Otto house. Several of the outbuildings on the Guenzel Farmstead appear to have good physical historic integrity (although the main house does not), but do not embody sufficiently distinctive design or construction characteristics to allow for their consideration individually.

In our opinion, the Wunibald Farmstead is eligible for listing on the National Register. The main house and outbuildings embody the distinctive characteristics of an early 20<sup>th</sup> century farmstead with good historic integrity. The farmstead also reflects the evolution of farming practices from the construction of the earliest building (the house, c. 1901) to the latest, a mid-century quonset-style machine shed. In our opinion, all of the extant structures on the farmstead contribute to the historic character of the complex. Additionally, the setting of the Wunibald Farmstead is a significant feature of the historic property. The farmstead's isolation, its location in mid-section and its commanding viewshed of the surrounding countryside not only contributed to its inadvertent exclusion from the original Beltway study, but also demonstrates a conscious effort of the Wunibald family to locate the farmstead to allow for such visual and physical characteristics.

If you concur with our findings, the Wunibald Farmstead should be included in consultation about project effects to historic properties. Additionally, we believe all consulting parties should be made aware of the addition of the Wunibald Farmstead to the list of eligible properties located within the boundaries of the Beltway study area.

If you have any questions, please do not hesitate to call me at 471-4769 or Bill Callahan at 471-4788.

Sincerely,

L. Robert Puschendorf  
Deputy State Historic  
Preservation Officer

Cc: Amy Zlotzky  
Ed Zimmer  
Cindy Veys  
Roger Figard

3500 (13)  
Pam Doc FEB 19 1999



**NEBRASKA STATE HISTORICAL SOCIETY**

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February 17, 1999

Mr. Ed Kosola  
Federal Highway Administration-Nebraska Division  
Federal Building, Room 220, 100 Centennial Mall North  
Lincoln, NE 68508

RE: Lincoln Beltway-National Trust for Historic Preservation request for determination of eligibility-Hulda Otto House

Dear Mr. Kosola:

We have received a copy of a letter to you from the National Trust regarding the referenced property. In order to assist the FHWA in determining the eligibility of the Hulda Otto House, we suggest the City of Lincoln provide the following information:

- 1) Current, clear photographs of the property, including perspectives from all four facades, representative detail shots and photos of any associated outbuildings. If possible, representative interior photos should be included. The photographs should be labeled and keyed to a site plan, and a floor plan if interior photos are taken. The photos may be in either color or black and white.
- 2) A map locating the property on an East Beltway map that will place the Otto house in geographic context with the EF-1 corridor and previously identified historic properties.
- 3) A history of the house including its construction date, builder if known and whether George Retzlaff did, indeed give the property to Hulda Otto. This history should take into account the Stevens Creek Stock Farm National Register nomination, and place the Otto house in context with properties included in that nomination.
- 4) The City should ask the Trust where it received its information about the Otto House and pursue that avenue of inquiry. The City should find out as much as possible about Hulda Otto herself, as well as the circumstances by which the house was built for her. This investigation should take into account the Trust's statement concerning: "...the role of women in the establishment of the Stevens Creek Stock Farm and the development of the first permanent agricultural community in the Lancaster County area."

FHWA, of course, will make the determination of eligibility for the Otto house. However, since our office is required to be consulted in determinations of this nature, we respectfully submit the above requirements in order that we may make informed comments to FHWA. If you have any questions, please do not hesitate to call me at 471-4788.

Yours Truly,

Bill Callahan  
Public Programs and Resource  
Planning Program Associate

Cc: NTHP-Rob Nieweg  
Roger Figard  
Amy Zlotsky



**NEBRASKA STATE HISTORICAL SOCIETY**

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December 7, 1998

Mr. Roger Figard, City Engineer  
Lincoln Public Works and Utilities Dept.  
555 South 10<sup>th</sup> Street  
Lincoln, NE 68508

Post-it® Fax Note	7671	Date	12/7/98	# of pages	2
To	Amy Zlatky	From	Bob Maschendorf		
Co./Dept.		Co.	Nebr. SHPO		
Phone #		Phone #			
Fax #	474-5160	Fax #			

*Advance copy*

RE: East Beltway Archeological Survey draft report review

Dear Mr. Figard:

We have completed our review of the referenced document. We generally concur with the findings of the report. We agree that sites 25LC125 and 25LC129 are eligible for listing on the National Register of Historic Places. In our opinion, however, site 25LC147 is also eligible for listing on the Register. Excepting the four sites discussed below, we concur that none of the other archeological sites identified in this investigation are eligible for the National Register.

In our opinion, sites 25LC115, 25LC143 and 25LC144 require further testing in order to determine whether they are eligible for listing on the National Register. The testing required for these sites would require a great deal of ground disturbance, consisting of blading strips of topsoil below the plow zone. As this type of testing is very intrusive and is also quite costly, we agree that testing of this nature may be delayed until a single corridor is chosen for further study. Our reasoning in this instance is the same as that in regards to geomorphological testing. The cost and intrusive nature of this type of testing do not justify their implementation until a single corridor is chosen. If these three sites lie within a corridor chosen for further study, then this more extensive testing will be necessary.

Similarly, we are sympathetic with the difficulties that have arisen with the identification and location of archeological features possibly associated with the Shirley Road Ranch (AKA Shirley Station). We believe that further work should be completed in an attempt to pin down where or if there are archeological features associated with this property. If a corridor is chosen for further study that may affect features associated with this resource, more intensive efforts will be necessary to identify their existence and location.

If you agree to the addition of 25LC147 as a National Register eligible site, and if you agree to complete testing and investigation on 25LC115, 143, 144 and the Shirley Station as discussed, we will concur with the findings of the report. As we have discussed, the final report should be made public, with the precise locations of the inventoried sites withheld per archeological protection laws.

*EM*      *EF*

*EC*

For the purposes of Section 106 review, and with the exception of standard pre-construction archeological monitoring and investigation, the City has completed its cultural resources inventory of the proposed Lincoln Beltway area of potential effect. We have previously concurred with the findings of the standing historic structures report completed by On Site Photography and Preservation, and with the South Beltway archeological investigation completed by UNL Department of Anthropology. The City and the Federal Highways Administration have now completed the first crucial step in insuring that the Section 106 review process may proceed smoothly and effectively. The next step of the process, assessing the effects of the project on known cultural resources, will begin once a final corridor is chosen for study.

If you have any questions, please do not hesitate to call me at 417-4769 or Bill Callahan at 471-4788.

Sincerely,

L. Robert Puschendorf  
Associate Director/Deputy State  
Historic Preservation Officer

Cc: Ed Kosola  
Ed Zimmer  
Amy Zlotky  
Jim Linderholm

# LINCOLN



DEPARTMENT OF PUBLIC WORKS  
DEPARTMENT OF PUBLIC UTILITIES

NEBRASKA'S CAPITAL CITY

MIKE JOHANNIS, MAYOR

September 17, 1998

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OLSSON ASSOCIATES

Mr. L. Robert Puschendorf  
Associate Director/Deputy State Historic Preservation Officer  
Nebraska State Historical Society  
1500 'R' Street  
Lincoln, NE 68501-2554

RE: South and East Beltway Study

Dear Mr. Puschendorf:

Thank you for your July 31, 1998, letter regarding the final draft of the East and South Beltway Historic Building Survey report. We appreciate your concerns and will certainly respect your wishes regarding characterizations of formal comments about the report prior to its release. We agree that a period of public review is needed before any action is taken as a result of the report.

Your letter also mentioned the next step in the 106 process which is to complete a programmatic agreement. At our August 13, 1998, meeting with the FHWA and representatives from your office, it was agreed that instead of using a programmatic agreement, we will continue consultation with your office on a case by case basis. The fact that the beltway corridors and potential impacts have been fairly well defined would indicate that each site can be examined individually. Please let me know if this is not consistent with your understanding of the most appropriate approach.

Thank you again for your continued support.

Sincerely,

Roger A. Figard  
Project Manager

C: Beltway Management Committee  
Ed Kosala  
Ed Zimmer  
Beltway Consultants

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AUG 04 1998

OLSSON ASSOCIATES

July 31, 1998

Mr. Roger Figard, City Engineer  
Lincoln Public Works and Utilities Dept.  
555 South 10<sup>th</sup> Street  
Lincoln, NE 68508

RE: Final Draft, East and South Beltway cultural resources survey

Dear Mr. Figard:

As you know, we recently reviewed a second draft of the cultural resources inventory completed by On Site Preservation and Photography. This draft was significantly different from the first draft: it was limited to a discussion of the Section 106 process, historic building survey methodology, and the results of applying National Register evaluation criteria to properties discovered by the On Site survey. The second draft report eliminated all but the most cursory discussion of the effects potential beltway construction would have on historic properties. This major change in the focus of the report was, as you know, done at our request. For a number of reasons it was and is still premature for formal discussions of beltway effects on historic properties.

Foremost, the cultural resources inventory completed by On Site is only part of the total inventory required by Section 106. Archeological investigation of the beltway corridor is ongoing, and any discussion of effects the project may have on historic properties or possible mitigation of effects would be premature prior to the completion of the full scope of cultural resource investigation. Second, although we have given preliminary comment on the On Site report, we have not seen a final draft, and have not given the City of Lincoln our formal comments on the On Site report. Any characterization of our formal comments prior to their release should be avoided. Third, as we have discussed many times, the fully completed final draft of the On Site report should be made available for public review and comment prior to any formal discussion or action taken as a result of the findings of the report. We look forward to receiving public comment on the report, and to reviewing it ourselves.

As we have indicated in meetings and previous correspondence, the next step in the 106 process should be to complete a programmatic agreement that will allow the City to continue its planning process while taking into account effects the beltway project may have on historic properties. We urge the City to begin work with our office on a programmatic agreement that will prevent any further delays in the beltway planning process. If you have any questions, please do not hesitate to call me at 417-4769 or Bill Callahan at 471-4788.

Sincerely,



L. Robert Puschendorf  
Associate Director/Deputy State  
Historic Preservation Officer

Cc: Ed Kasola  
Ed Zimmer  
Amy Zlotzky  
Jim Linderholm



**NEBRASKA STATE HISTORICAL SOCIETY**

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June 11, 1998

Ms. Amy Zlotsky  
Olsson Environmental Sciences  
1111 Lincoln Mall  
Lincoln, NE 68508

RE: Review of 2<sup>nd</sup> draft historic buildings survey final report-East and South Beltways

Dear Ms. Zlotsky:

Thank you for giving us the opportunity to review the referenced 2<sup>nd</sup> draft. Overall, we concur with the findings of the draft report. I have enclosed marked-up copies of the draft. My comments are in pencil, and the pages have been marked with yellow stick-ons. Generally, the draft is in good shape. The inclusion of extensive methodology sections, discussion of National Register and survey evaluation criteria and an overview of the Section 106 process should make the report self-explanatory.

The only outstanding determination of eligibility is for LC00:E-141. Please note our comments on this property on all three appropriate appendices. In short, without further explanation of the "irreversible" deterioration, in our opinion, given the information we have, the site is a good candidate for listing on the Register. Additionally, the survey form for E-99 seems to indicate that the property is eligible for the National Register, however Appendix B indicates that it is not. Given the information we have been provided, we feel the building is a good candidate for the Register under criterion C. Once these issues are rectified, and our comments and your comments are incorporated along with the City of Lincoln's comments, we feel the report will be ready for wider review.

If you have any questions, please do not hesitate to call me at 471-4788.

Yours Truly,

Bill Callahan  
Public Programs and Resource  
Planning Program Associate

Cc: Ed Zimmer



**NEBRASKA STATE HISTORICAL SOCIETY**

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June 3, 1998

Ms. Amy Zlotzky  
Olsson Environmental Sciences  
1111 Lincoln Mall  
Lincoln, NE 68508

**RECEIVED**  
**JUN 08 1998**

**OLSSON ASSOCIATES**

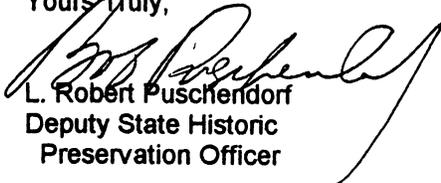
RE: Review of "Archeological Inventory and Evaluation of Lincoln's South and East Beltway: Investigation along the South route SM-4, Lancaster County, NE-by Stan Parks and Stacy Stupka-Burda"

Dear Ms. Zlotzky:

Thank you for providing us the referenced report. We concur with the findings of the report: sites 25LC93, 25LC94, 25LC95, 25LC96 and 25LC97 are not eligible for listing in the National Register of Historic Places. Site SOAP97-2 will require further testing to determine whether it is a good candidate for the Register. Additionally, we concur with the report's recommendation for geomorphological studies of the stream valleys for the potential of buried cultural resources.

Our concurrence and comment on this report apply only to the subjects of the report. All outstanding archeological and geomorphological investigations are still subject to our review. If you have any questions, please do not hesitate to call me at 471-4769 or Terry Steinacher at 308-665-2918.

Yours Truly,



L. Robert Puschendorf  
Deputy State Historic  
Preservation Officer

Cc: Terry Steinacher

FEB 23 1998

Lincoln, Neb.


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February 19, 1998

 Mr. Roger Figard, City Engineer  
 Lincoln Public Works and Utilities Dept.  
 555 South 10<sup>th</sup> Street  
 Lincoln, NE 68508

RE: Review of draft historic buildings survey final report-East and South Beltways

Dear Mr. Figard:

Thank you for giving us the opportunity to review the referenced draft. Our comments on federally assisted projects are required by Section 106 of the National Historic Preservation Act, and implementing regulations of 36 CFR Part 800. Section 106 is a consultation process by which federal agencies are required to seek ways to avoid or reduce adverse effects their undertakings may have on historic properties; and to afford the Advisory Council on Historic Preservation an opportunity to comment on the undertaking. The first requirement of the Section 106 process is to identify historic properties in the area of project effect. Part 800 requires this step to be completed in consultation with our office. This draft report was developed in response to our request for the identification of historic properties within the Beltway project area.

Generally speaking, we believe this report adequately documents historic properties in the project area. In fact, in many ways, the report exceeds our expectations, and we appreciate the efforts of the City of Lincoln and its consultants in developing the document. There are, however, some significant issues to be addressed prior to our concurrence with the findings of the report. These issues are as follows:

**Report definition**

The report should include a fairly detailed description of its purpose. This "introduction" should tell who wrote the report, who paid for it, why it was written, and what the anticipated federal assistance will be. It is crucial that a fairly detailed definition and explanation of the Section 106 process be included. The introduction should emphasize that 106 applies to properties eligible for listing on the National Register of Historic Places, as well as those that are listed; and should explain how the Register criteria are used in the 106 process. A definition of Register evaluation criteria and aspects of physical integrity is necessary. These definitions may be quoted directly from National Register Bulletin 15. Additionally, it may be prudent to discuss criteria considerations as defined in Bulletin 15. For example, according to the report, no churches are considered eligible, however a grave site/cemetery may be eligible for the Register.

**Reconnaissance survey methodology**

There needs to be a clearer definition of the reconnaissance survey methodology. This is very important to both the consulting party's and the public's understanding of the 106 process. The methodology definition should include a clear delineation of the survey area (which already exists in the report), how it was physically investigated, a discussion of the Secretary's Standards for survey and evaluation, and the type and scope of preliminary research completed. The methodology should clearly explain (in lay terms) why so many properties were *not* surveyed, why so many were and why, of those properties surveyed, relatively few are considered eligible for the Register.

This section should define the procedures used to compare farmsteads, residences and barns when determining which were considered eligible, and which were not. There needs to be a more detailed contextual explanation of why one farmstead, barn or residence is a "better" example than another. This section should also explain how neglect and deterioration of a property as well as inappropriate additions or intrusions are evaluated, and what

effect these factors have on whether or not a property is considered eligible for the Register. This comparative discussion should be rather detailed, but may use generic examples. It is not necessary to explain, building by building, how these evaluations are made. If the explanation of the methodology is sufficiently clear, a reader may be referred back to this section when comparative issues arise.

When discussing survey methodology, include the extensive public input and participation that was part of the process. Besides being a key tool of the survey methodology, Part 800 requires that a federal agency and the State Historic Preservation Office seek and consider the views of the public when taking steps to identify historic properties, evaluate effects on historic properties, and when developing alternatives to adverse effects (800.1[2]{iv}). The City's effort to provide the public an opportunity to assist in the identification of historic properties helped satisfy both the letter and intent of Section 106. Additionally, this effort to include the public in the process from the beginning helps create a working foundation and an atmosphere of trust through which later public participation may be more easily achieved. Always the most difficult aspect of Section 106 to accomplish satisfactorily, we commend the City on its commitment to date to include the public in the Section 106 process.

### **Intensive survey methodology**

In addition to defining the methodology of the reconnaissance survey of the report, it is necessary to further define the methodology of the intensive survey of the Steven's Creek Bottoms area. Besides reiterating much of the above, it is necessary to define the reasons for intensively surveying the area, and to explain the methods used to identify and evaluate possible historic properties there. We are somewhat concerned since there is no mention whatever of cultural landscapes in the report, and we specifically asked for an evaluation of the area as a cultural landscape or rural historic district. Additionally, the evaluation of the properties within the intensive survey area appears to miss the point of evaluating the area as a cultural landscape or rural historic district.

Although individual buildings and farmsteads within the intensive survey area may contribute to the significance of a cultural landscape or rural historic district, they do not necessarily define it. Further, in the context of a landscape or rural district, individual buildings need not be individually eligible for the Register. Though potentially contributing elements, buildings would not be the only components in a cultural landscape or rural district...they may not even be the most important. Cultivation patterns, windbreaks, road and trail patterns, tree plantings, farmstead orientation and visible waterway alterations should all be considered when evaluating the area as a cultural landscape or rural historic district.

In order to evaluate the intensive survey area in this context, it is imperative to: a) establish the historic context of early settlement in the area (which is already well done); b) using the historic context, establish a period of significance and physical boundary; c) establish whether these historic settlement patterns are *significant* in National Register terms; d) identify potential cultural elements that remain from the period of significance; e) if these elements remain, evaluate them using Register evaluation criteria, and then; f) evaluate the physical integrity of those elements using the Register aspects of integrity, keeping in mind that the elements need not be individually eligible. In order to accomplish d-f above, it is necessary, at minimum, to review GLO maps, plat maps, USGS maps and aerial photography. Of course, written archival and documentary material should also be reviewed, but it appears many of those resources have been studied. If the evaluation for the intensive survey area has taken place as described above, that needs to be documented. If not, then it must be done in order to satisfactorily complete the document.

### **Assessment of effects and the next step**

Finally, it is premature to assess the Beltway project effects on individual historic properties, possible mitigation strategies and especially route selection. Completion of the Beltway planning process: environmental review, details of funding opportunities, route selection, engineering studies and eventual construction are sufficiently distant in time to make this level of evaluation, at this point in the 106 process, unnecessary and inadvisably inflexible. We may assume, of course, that a project of this magnitude may have adverse effects on historic properties. The next step in the 106 process should be to develop a programmatic memorandum of agreement (PMOA) that will allow project planning to continue while taking into account all historic properties.

A PMOA will define procedures that will allow the consulting parties as well as the public to take into account historic properties as the planning process continues. It is during the consultation process defined by the PMOA that we will identify and discuss alternatives to adverse effects on individual historic properties. We remind the City

that historic properties include those with archeological significance. Although archeological investigation of the project area has begun, it has not been completed, and archeological properties must be taken into account when developing the PMOA.

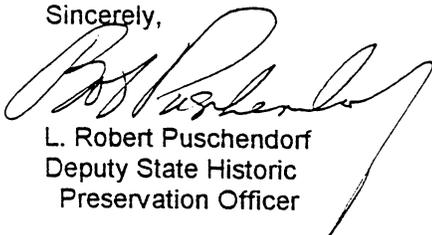
Although it is premature to discuss project effects on an individual property basis, it is timely to define project effects in the broader context of Section 106 compliance. The report should explain and define what is meant by no effect, no adverse effect and adverse effect, using the definitions at 800.9. Generic examples are probably useful as an instructional tool but, as before, specific examples using surveyed properties are not necessary at this time. We do, however, appreciate the effort put forward in an attempt to identify individual property effects. We believe using this section of the report as a starting point in the context of a PMOA would be a prudent use of resources, and save time during future consultation.

We have forwarded an informal memo that highlights some of the issues discussed above, some issues of detail we noticed in the report, and a marked-up copy of the report to your consultants. Portions of the memo may seem redundant, as it was developed during real-time review of the report. If you wish a copy of these materials, please let us know.

We would like to emphasize once again that the National Historic Preservation Act, and specifically Section 106 of that act, was passed to provide the public an opportunity to have a voice in how federally assisted projects affect historic properties in their communities. Public participation, seeking the views of the public and at times requesting public involvement in the consultation process is required throughout Part 800. This process is designed to give the public voice in a sometimes unsympathetic bureaucratic process, and it is imperative the public be given that voice *at least* when called for in regulation. In expectation of continued public cooperation and input, we hope that this document will be made available to the public at large, and specifically to those groups and individuals that have expressed a desire to participate in the 106 consultation process.

Part 800 requires that the Section 106 process be initiated early in the planning stages of the undertaking, when the widest feasible range of alternatives is open for consideration. Last year at this time, we were very concerned that the Beltway planning process was far outstripping Section 106 review, and was possibly foreclosing on FHWA's opportunity to comply with 106. Given the current status of project planning as we understand it, and provided archeological investigations are completed as planned, and provided the remainder of the 106 process is adhered to, we believe consultation may now proceed concurrently with project planning without risking non-compliance. We commend the City for its efforts at "catching up" the 106 process with the remainder of project planning, and look forward to continuing the consultation process.

Sincerely,



L. Robert Puschendorf  
Deputy State Historic  
Preservation Officer

cc: Ed Kosola-FHWA  
Art Yonkey-DOR  
Ed Zimmer  
Amy Zlotsky-Olsson Environmental  
Jim Linderholm-HWS  
Melissa Dirr-On Site  
Claudia Nissely-ACHP



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**COPY**

July 22, 1997

Mr. Roger Figard, City Engineer  
Lincoln Public Works and Utilities Dept.  
555 South 10th Street  
Lincoln, NE 68508

RE: East and South Beltway Study, Section 106 review-Draft Interim Report #3

Dear Mr. Figard:

We last wrote your office June 10, 1997 (copy enclosed) concerning Federal Section 106 regulatory requirements. That letter was to inquire as to the status of the City's responsibilities as outlined in our April 1996 letter to you (copy enclosed). To date, we have received no response from the City. The City's consultant, apparently responding to our June letter, did forward copies of Beltway study documents. This was the first opportunity our office has had to review these documents, some over one year old. On July 21 of this year we received the above referenced document from the consultant as part of a mass mailing.

We are extremely disappointed in draft Interim Report #3. This document affirms that the City has not taken into account its Section 106 obligations. To begin, Chapter 5, pp. 4-5 indicates that the consultant has used the City's GIS system to identify cultural resources in the project area. We know, from dealing with the City on other issues, that cultural resources are not included in the GIS system. To then therefore claim in table 5-1 that virtually no cultural resources exist in the project area is specious to the point of being dishonest.

The three paragraphs devoted to Section 106 review on pages 5112-13 are insufficient to address the complexity of this project and its potential to effect cultural resources. These paragraphs also appear to misrepresent our position regarding this issue. The March 1996 meeting referenced at page 5-12 addressed significantly broader issues than the single issue referenced in the draft report #3 (see our April 1996 letter). The draft report also references known cultural resources. The entire point of both our previous letters was to address unknown cultural resources. As we indicated in our April 1996 letter, neither our office nor anyone else has a clear idea of the number or nature of cultural resources in the potential area of project effect.

Additionally, as we stated in both our April 1996 and June 1997 letters, limiting a cultural resources investigation to a 1/4 mile wide corridor for a project of this nature is woefully insufficient. If the City had deigned to inquire, this reasoning is quite clear. In relation to cultural resources, the City's selection of a project corridor is arbitrary. An arbitrarily defined 1/4 mile wide corridor does not, cannot, and will not ever sufficiently address long term, indirect and aggregate effects a project of this size and complexity will have on cultural resources. We based the boundaries for cultural resource investigation on

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the City's own study area (our April, 1996 letter). We know of no other logical, defensible criteria for a project with such enormous potential for long term, indirect and aggregate adverse effects to cultural resources (4/96).

Finally, the draft report seems to imply that Section 106 consultation has begun in regard to this project, and that the City has "coordinated" with our office. We have never, throughout the life of this project, received communication from the City of Lincoln. In the past year and one-half we have met with the consultant's sub-contractor twice, and have very recently had an informal meeting with FHWA and NDOR. As referenced, we have twice asked the City, in writing, to begin addressing Section 106 issues and have received no response. We do not view events to date as "coordination with the SHPO." We have attempted, in good faith, to assist the City with its Section 106 obligations in a timely, methodical, defensible and professional manner. We attempted to do so in order to prevent a situation that would cause lengthy, costly and potentially contentious project delays. By being unresponsive, the City has come to the brink of self-inflicting just such a situation; of foreclosing on the Advisory Council and Historic Preservation's opportunity to comment on this project; and to preclude the ability of the project's sponsors to comply with federal law.

There is still opportunity for the City to comply with the intent and letter of Section 106 and Part 800. We advise the City to scrap the inaccurate and potentially damaging cultural resource evaluation in the draft Interim Report #3, and to immediately begin good faith, defensible and coordinated consultation with this office, FHWA and NDOR. Additionally, we request that this letter, as well as our letters of April 23, 1996 and June 10, 1997 be included in the final Interim Report #3 to ensure an accurate public record of our desire to address this issue.

We reiterate that consultation with the State Historic Preservation Office has not been initiated, and that failure to do so may lead to foreclosure of the ability of a federal agency to assist the project. Our obligation remains to aid FHWA and the City with their Section 106 responsibilities. We urge the City to accept this assistance while all parties are still in a position to move forward.

Yours Truly,

L. Robert Puschendorf  
Deputy State Historic  
Preservation Officer

cc: FHWA-Ed Kosola  
NDOR-Bill Hurst  
HWS-Jim Linderholm  
Olsson Environmental-Amy Zlotzky  
Hon. Mike Johanns-wencl.  
Claudia Nissley-Advisory Council  
on Historic Preservation-wencl.



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June 10, 1997

Mr. Roger Figard, City Engineer  
Lincoln Public Works and Utilities Dept.  
555 South 10th Street  
Lincoln, NE 68508

RE: East and South Beltway Study, Section 106 review

Dear Mr. Figard:

In April of last year we provided your office our comments (copy enclosed) on Interim Report Number One for the referenced project. We provided additional comments regarding the larger issues and difficulties inherent in a project the magnitude of the East and South Beltway. These comments were copied to the Federal Highway Administration, EA Engineering and staff from the Lincoln/Lancaster Planning department. Our comments are required on federally assisted, licensed or funded undertakings pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, and the Section 106 implementing regulations, 36 CFR Part 800.

The bulk of our April 1996 letter outlined the documentation our office would require in order to adequately comment on the Beltway project as required by 800.4(a)(ii). Interim Report Number One, provided to our office in March of 1996, illustrated a large project study area which included a number of broadly defined potential corridors for the Beltway project. At that time, our office indicated that the FHWA or its designee, presumably the City of Lincoln, should undertake cultural, historical and archeological investigations of the entire project area. The scope of these investigations were detailed in our April letter. To date, we have received no response of any kind to our letter from the City, EA Engineering or the FHWA. We have, however, received a number of calls and letters from citizens concerned about the potential of the Beltway to adversely effect significant cultural properties.

We have been made aware, through local media, of progress made by the City and its consultant regarding the Beltway corridor selection process. According to published reports, the City and the consultant have eliminated all but three (one southern and two eastern) alternatives for the Beltway corridor, including elimination of the no-build alternative. To our knowledge, the selection process has not addressed the potential for effects on cultural resources. No consultation has taken place with our office since our April 1996 correspondence, as required by Section 106 regulations. If these reports are accurate, and significant cultural resources exist within the proposed corridors, it may be extremely difficult for our office to assist the FHWA in completing their responsibilities pursuant to Section 106. Unfortunately, that circumstance may foreclose the Advisory Council on Historic Preservation's opportunity to comment on the project, and preclude FHWA's compliance with federal law.

As indicated in our April 1996 letter, our office desires to assist the FHWA and the City in completing their responsibilities pursuant to Section 106. It is difficult for our office to provide that assistance if we are not consulted as part of the process, and if our recommendations have not been addressed. If the City or FHWA has completed the cultural resource inventories requested by our office last year, we would appreciate being provided the conclusions and recommendations of those inventories. If all but one project alternative has been eliminated, and the recommended cultural inventories have not been completed, please inform us how the City and FHWA intend to complete their Section 106 responsibilities without consultation with this office and the Advisory Council on Historic Preservation.

Yours Truly,

L. Robert Puschendorf  
Deputy State Historic  
Preservation Officer

cc: Amy Zlotky-EA Engineering  
Phil Barnes-FHWA  
Claudia Nissley-Advisory Council  
on Historic Preservation

LRP\WJC



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April 23, 1996

Mr. Roger Figard, City Engineer  
Lincoln Public Works and Utilities Dept.  
555 South 10th Street  
Lincoln, NE 68508

**RECEIVED**

APR 25 1996

EA Engineering, Science, and Technology  
Lincoln, NE

RE: East and South Beltway Study: cultural resource review,  
Interim Report No. 1

Dear Mr. Figard:

We have reviewed the referenced document. We understand this interim report to be a preliminary effort at providing data and analyses about the feasibility of and alternatives to the beltway project; and to document work completed as the study advances. We also understand this preliminary process is intended, in part, to determine what levels of investigation would be required to satisfy local, state and federal approvals for this project, if the project is determined to be feasible and necessary. Although we understand that the City of Lincoln is the primary contact, we assume that the Federal Highway Administration is providing funding, and will be the lead federal agency for this project.

The intent of this letter is to assist the City of Lincoln in determining what preliminary steps are necessary to begin the Section 106 review process. Section 106 of the National Historic Preservation Act of 1966 and its implementing regulations, 36 CFR Part 800 (copy enclosed) requires, among other things, that Federal agencies:

- 1) Identify historic properties within the area of an undertaking's area of potential effects (APE);
- 2) Determine what effects an undertaking may have on historic properties within the APE, and;
- 3) Seek ways to avoid or reduce adverse effects an undertaking may have on historic properties.

Section 106 and Part 800 also require that Federal agencies consult with the State Historic Preservation Office throughout the 106 process, and provide the federal Advisory Council on Historic Preservation an opportunity to comment on the undertaking. In Nebraska, the Preservation Division of the State Historical Society is the SHPO.

East and South Beltway  
Mr. Roger Figard  
Page Two

Part 800 defines a federal undertaking as a federally assisted or licensed project (800.1). Historic properties are those listed on or eligible for listing on the National Register of Historic Places (800.2{e}). APE is the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties (800.2{c}). Adverse effects to historic properties are defined at 800.9.

In order for the Section 106 process to begin for the beltway project, historic properties within the APE must be identified. This requirement should be fulfilled as early in the planning process as is feasible. Early identification of significant historic, architectural and archeological properties can help avoid lengthy, costly delays in later project planning and approval. To date, EA Engineering has identified previously surveyed archeological properties and properties already listed on the National Register of Historic Places. In order to completely satisfy the identification needs of the Section 106 process, the following additional investigations should be completed:

1) A complete architectural\historic building survey of the entire study area, planned and completed in consultation with this office.

Rural Lancaster County has never been completely surveyed for historic properties with architectural or historic significance. In order to understand what historic properties may be affected by the project, we require a complete accounting of potentially significant properties. Additionally, indirect and long term effects of the beltway undertaking must be taken into account. Therefore, the entire project area should be surveyed and not limited to a narrow area identified as potential right-of-way.

2) An intensive historic survey of the Stevens Creek bottoms area. This survey should take into account the potential for a rural historic district and\or a cultural landscape district. This survey should also be planned and completed in consultation with this office.

The Stevens Creek bottoms area was the first part of Lancaster county to be settled by Euro-Americans. Except for the Stevens Creek Stock Farm, which is listed on the National Register, we have little information about the existence and\or integrity of structures that may be associated with early settlers. With the Stevens Creek Farm as our only example, there appears to be the potential for a rural historic district in the area.

Historic cultural landscapes are those that have been shaped by cultural forces. Again, we have little information as to the existence or integrity of potentially significant cultural landscape features created during the settlement era.

3) An archeological investigation of the entire study area, planned and completed in consultation with this office.

A literature and records search concerning archeological properties has been completed (Barton,

East and South Beltway  
Mr. Roger Figard  
Page Three

1996). We recommend that an intensive survey of all potential stream crossings from valley margin to valley margin should be completed, and that a ten-percent sample of all upland areas should be intensively surveyed.

It is necessary to perform the surveys described in 1&2 above for the entire beltway study area. In the long term, waiting until a preferred route is chosen before completing these surveys could result in lengthy, costly delays. At minimum, to seek alternatives to potential adverse effects; or to determine if there are feasible and prudent alternatives to adverse effects (Section 4(f) also applies to historic properties), the entire beltway study area should be considered the APE.

Additionally, as indirect and long term effects of a project of this magnitude must be taken into account, a large study area must be examined. Issues such as visual effects, long-term changes in land use and associated transportation upgrades must be considered. This can only be accomplished by identifying an area of potential effects at least as large as the entire study area.

Thank you for allowing us to review interim report No. 1. We would be pleased to meet with you or your representatives to discuss the methodology, scope and need of the survey requirements discussed above. If you have any questions, about the architectural\historical components of this letter, or would like to set up a meeting, please do not hesitate to call me at 471-4788. For questions about the archeological components, please call Terry Steinacher, 308\665-2918.

Yours Truly,



Bill Callahan  
Historic Buildings Survey  
Program Associate\National  
Register Coordinator

cc: Amy Zlotsky  
Phil Barnes  
Ed Zimmer  
Mike Rindone  
Terry Steinacher