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

Memphis Airports District Office
2600 Thousand Oaks Blvd., Suite 2250
Memphis, TN 38118-2486

Phone: 901-322-8180

September 30, 2016

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

RE: Request for Advisory Council Review of FAA Determination of No Adverse Effect - Bowman Field Airport (LOU), Louisville, KY

Dear Mr. Nelson:

The Federal Aviation Administration (FAA) Memphis Airports District Office has been involved in consultation, under Section 106 of the National Historic Preservation Act, for an undertaking around the Bowman Field Airport in Louisville, KY. The undertaking consists of easement acquisition and tree trimming/replacement around the airport. A thorough description of the undertaking is included in the enclosed documentation.

The FAA initiated consultation under Section 106 beginning in 2015 and held three consultation meetings with consulting parties. After careful consideration of the undertaking, potential effects, and comments from the consulting parties, the FAA issued a Determination of No Adverse Effect on May 24, 2016. After releasing the determination, multiple consulting parties objected. Therefore, in accordance with 36 Code of Federal Regulations (CFR) § 800.5(c)(2)(i), the FAA requests that the Advisory Council review the FAA finding pursuant to 36 CFR § 800.5(c)(3(i). To assist in your review, the following items are enclosed:

1. FAA Determination of No Adverse Effect, which includes a description of the undertaking specifying the FAA's involvement, its area of potential effect, including photographs and maps, steps taken to identify historic properties, an assessment of effects on historic properties and the FAA's finding of No Adverse Effect.
2. Memo from Katherine Andrus, FAA Federal Preservation Officer, which explains in greater detail why the criteria of adverse effect were found to be inapplicable.
3. Conditional concurrence letter from the Kentucky Heritage Council.
4. Section 106 Documentation.
5. Comments from Section 106 Consulting Parties.

The FAA appreciates the Advisory Council's participation in this matter. Our plan was to submit this request to you earlier this year; however, due to the applicant's indecision on whether to continue the process, our submittal has been delayed.

As you conduct the review, please feel free to contact me with questions and/or concerns. You may reach me by phone at (901) 322-8181 or by email at Phillip.Braden@FAA.gov.

Sincerely,

Phillip J. Braden
Manager, Memphis Airports District Office

FAA Determination of No Adverse Effect

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

Memphis Airports District Office
2600 Thousand Oaks Blvd, Suite 2250
Memphis, TN 38118

Phone: 901-322-8180

May 24, 2016

Mr. Craig Potts
Executive Director and State Historic Preservation Officer
Kentucky Heritage Council
300 Washington Street
Frankfort, KY 40601

Dear Mr. Potts:

RE: DETERMINATION OF EFFECTS
BOWMAN FIELD AIRPORT, AREA SAFETY PROGRAM
LOUISVILLE, KY
KHC # 45249

The Federal Aviation Administration (FAA) Memphis Airports District Office (ADO) is proposing a "Determination of No Adverse Effect" under Section 106 of the National Historic Preservation Act (NHPA) for the undertaking at the Bowman Field Airport (LOU) in Louisville, KY. As you are aware, the undertaking consists of easement acquisition and tree trimming/replacement. The purpose of the undertaking is to enhance safety by removing tree obstructions and restore the airport's capabilities for nighttime instrument approach procedures.

After careful consideration of the information provided by the project proponent, the Louisville Regional Airport Authority, the Kentucky Heritage Council (State Historic Preservation Office), and consulting parties during the Section 106 consultation process, the FAA has concluded the undertaking would not adversely affect historic properties. This conclusion is predicated on our assessment that the impacts to the trees are not a contributing element to the historic resources. I respectfully request your review and concurrence or objection to the enclosed determination.

In closing, I would like to mention that your office, along with the other consulting parties in this undertaking, will soon be receiving a hard copy of documents related to the proposed project. The documents are being provided in accordance with our discussions at the last Section 106 consultation on March 31, 2016.

Thank for your participation in the consultation. If you have any questions, please feel welcome to contact me at (901) 322-8181 or Aaaron Braswell of my staff at (901) 322-8192.

Sincerely,

Phillip J. Braden
Manager, Memphis Airports District Office

Enclosures

cc: Bowman Field Airport Section 106 Consulting Parties

Section 106 Effects Determination

Federal Aviation Administration (FAA)
Memphis Airports District Office
2600 Thousand Oaks Boulevard, Suite 2250
Memphis, TN 38118
May 24, 2016

Section I. Airport and Project Proponent Information:

Airport: Bowman Field Airport (LOU), 2815 Taylorsville Road, Louisville, KY 40205

Project Proponent: Louisville Regional Airport Authority, 600 Terminal Drive, Louisville, KY 40209

Section II. Description of Proposed Undertaking:

The Louisville Regional Airport Authority (LRAA) is proposing a project that would involve reducing tree heights so that nighttime instrument approach capabilities would be restored to the Bowman Field Airport. Specifically, the project would enable the airport to re-establish nighttime instrument approach procedures which have been temporarily suspended due to obstructions within FAA airspace surfaces. The proposed undertaking involves the following elements:

1. Easement acquisition for 44 residential parcels near the Bowman Field Airport.
2. The trimming or replacement (as determined by property owner) of 104 trees located on the easement acquisition properties as well as Seneca Park and Big Springs Golf Course. Tree trimming would be completed by arborists. This includes reducing tree heights below applicable FAA airspace surfaces. Tree replacement would be accomplished at a 2:1 ratio (planting of two trees for every tree removed). The replacement trees will be of species that will not grow to the same height as the tree being replaced so as to prevent future airspace obstructions.
3. The removal of trees would involve cutting trees near the surface elevation. Project specifications would require stump removal to a depth of six inches below surface elevation. Existing tree roots would remain in place.

The FAA Memphis Airports District (MEM-ADO) determined that the proposed undertaking had the potential to cause effects on potentially eligible historic properties. Therefore, the Section 106 consultation process was initiated.

Section III. Determination and Description of the Area of Potential Effects (APE):

The FAA sent invitations to 18 different agencies and local property owners to join the process as Section 106 Consulting Parties. Twelve accepted the invitation. During the consultation process, the FAA worked

with the consulting parties, including the Kentucky Heritage Council (KHC) and the project proponent, to develop the area of potential effects (APE). The APE is based on the project area with a sufficient buffer to account for direct and indirect effects. The FAA submitted a letter to the KHC on September 22, 2015, recommending the adoption of the APE. The KHC responded on October 9, 2015, requesting additional information, and subsequently requested that the FAA solicit comments from all consulting parties. After providing additional information and soliciting comments on the APE, the FAA re-submitted the proposed APE to the KHC on March 18, 2016. The KHC issued a letter on April 7, 2016, which concurred with the definition of the APE. The APE is graphically depicted in the attached document.

Section IV. Steps Taken to Identify Historic Properties in the APE:

A draft Cultural Resources Evaluation (CRE) was completed by Brockington and Associates, Inc., a subcontractor to Hanson, Inc. in December of 2014 based on a preliminary APE. Consulting parties were afforded an opportunity to review and comment on this report and as a result, a draft Supplement to the CRE was prepared in March 2016. The Final CRE and Supplement documents are attached to this determination.

As part of the preparation of the CRE, Brockington and Associates, Inc. conducted archival research to identify listed resources on the National Register of Historic Places (NRHP). One resource, the Bowman Field Historic District, was identified as it is listed for NRHP criteria[1] A and C. Brockington and Associates, Inc. then completed field research to identify potentially eligible resources within the APE. Thirteen resources were identified as potentially eligible under criteria A, B, and/or C and consist of: two golf courses, six districts, and five individual structures. Seven of the 13 resources were deemed eligible for the NRHP. The resources are listed below along with the associated eligibility criteria.

(1) Seneca Park-Criteria A
(2) Seneca Vista Historic District-Criteria A, B, and C
(3) Seneca Manor Historic District-Criteria A and C
(4) McCoy Manor Historic District-Criteria A and C
(5) Kingsley Historic District-Criteria A, B, and C
(6) Seneca Village Historic District-Criteria A and C
(7) Seneca Village No. 2 Historic District-Criteria A and C

Section V. Assessment of Effects

The CRE contains the assessment of effects on the resources described above in Section IV. The following paragraphs summarize the undertaking and effects analysis.

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[1]NRHP criteria for evaluation consists of four categories. These are: "A" associated with events that have made a significant contribution to the broad patterns of our history; "B" associated with the lives of significant persons in our past; "C" embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; "D" have yielded or may be likely to yield, information important in history or prehistory.

The undertaking would affect 37 trees at Seneca Park. The CRE notes the vegetative landscape for the park developed organically and much of the golf course landscape was altered by the development of I-64 during the 1960s. No trees were identified that would qualify as character-defining features for the golf course, and as such, the undertaking would have no adverse effect on the resource.

The undertaking would involve the acquisition of eight easements to trim/replace 11 trees in the Seneca Vista District. The CRE indicates that the neighborhood did not appear to be developed with a design specific to vegetation. Plantings appear to have developed organically or by individual property owners. In addition, neither the type nor overall height of the trees is considered to be a contributing element of the neighborhood. Therefore, the proposed undertaking would have no adverse effect.

The undertaking includes acquisition of one easement in the Seneca Manor District to trim/replace one tree. Plantings in the neighborhood appear to have developed organically or by property owners, although there is some uniformity of high canopy oak trees west Valletta Road north of the APE. Neither the type nor overall height of the trees is considered to be a contributing element of the neighborhood. Therefore, the proposed undertaking would have no adverse effect on the resource.

No easements or tree trimming/replacement is proposed in the Kingsley or McCoy Manor Districts. The undertaking would have no adverse effect on these resources.

The undertaking includes acquisition of 25 easements to trim/replace 28 trees within the Seneca Village District. The CRE notes the neighborhood did not appear to be developed with a design specific to vegetation. Vegetation plantings appear to have developed organically or by property owners. Neither the type nor overall height of the trees is considered to be a contributing element to the neighborhood. Based on this information, the undertaking would have no adverse effect on the resource.

The undertaking includes acquisition of nine easements in the Seneca Village No. 2 District and the trimming/replacement of 10 trees. The CRE states the neighborhood did not appear to be developed with a design specific to vegetation. The only existing vegetation design element is the tree lined streets, which consist of Bradford Pear Trees planted around 1990; none of those trees are part of the undertaking. Neither the type nor overall height of the trees is considered to be a contributing element. As such, the undertaking would have no adverse effect on the resource.

Section VI. Summary and Conclusions:

- The undertaking consists of acquisition of 44 property easements to trim and replace trees. A total of 104 trees have been identified for trimming/replacement.
- There is one National Register –listed historic district within the APE, the Bowman Field Historic District. However, no trees are proposed to be affected within the District.
- Thirteen (13) additional resources were identified within the APE. Seven (7) were determined to be eligible under NRHP criteria A, B, and/or C.
- The undertaking would have no adverse effect on eligible resources as the vegetative plantings are not a contributing element to eligibility of any of the resources.

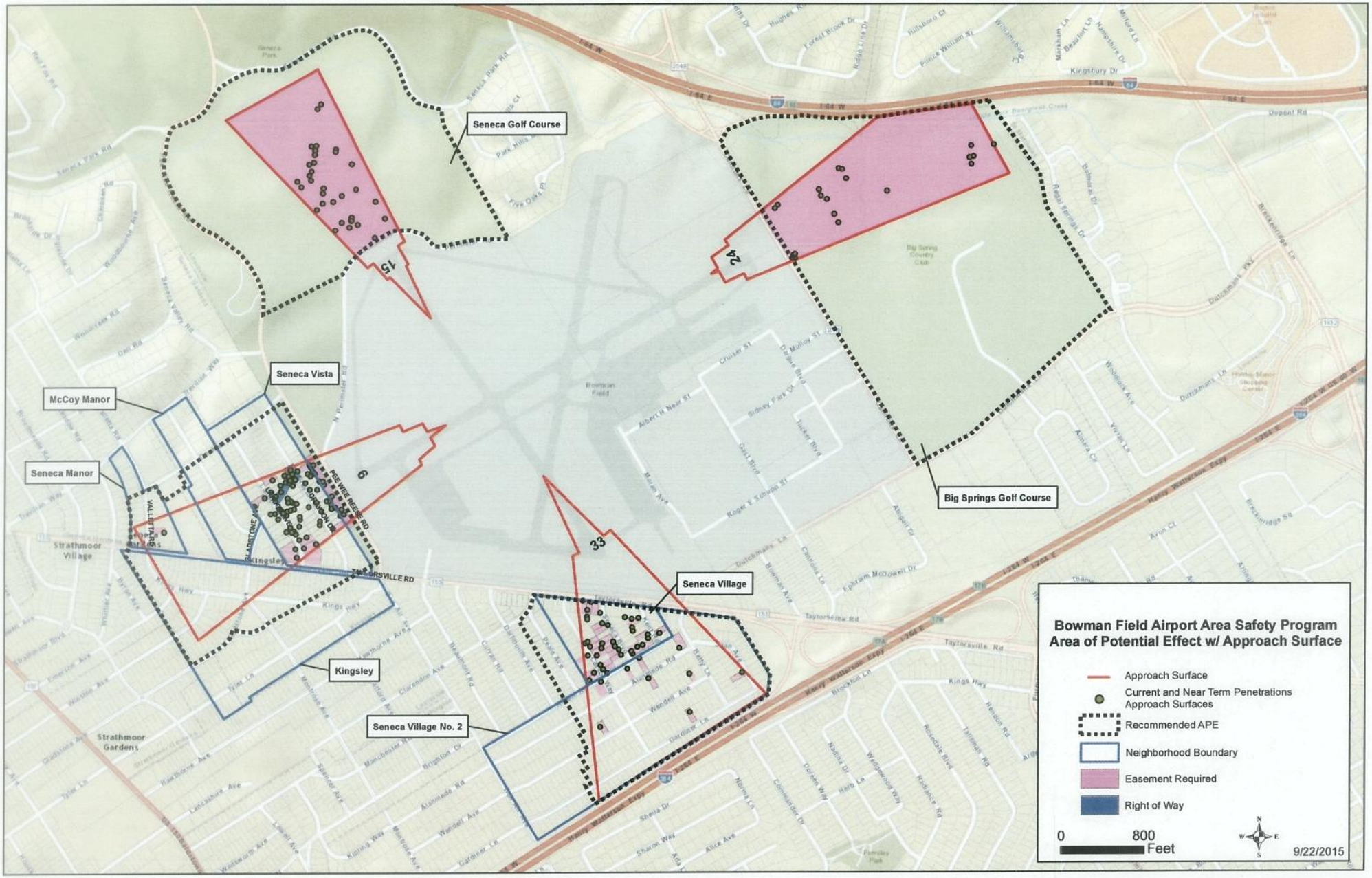
- Viewshed impacts would only be temporary. Trimmed trees would not be reduced to a height that would alter the viewshed of eligible resources. Replacement trees would provide coverage similar to trees being replaced.
- Impacts to potential below ground resources are not likely to occur as stump removal will be limited to a depth of six inches below surface elevation and tree roots will remain in place.

Section VII. FAA Determination of No Adverse Effect under NHPA:

Based on the research completed and documented in the Cultural Resource Evaluation, and the Section 106 consultation process, the FAA has concluded that the undertaking/proposed action would have no adverse effect on eligible resources within the APE. This determination concludes the consultation under Section 106 and constitutes the FAA's finding of no adverse effect under 36 C.F.R. Part 800.

Phillip J. Braden, Manager
Federal Aviation Administration
Memphis Airports District Office

May 24, 2016
Date


Seneca Golf Course
Seneca Vista
McCoy Manor
Seneca Manor
Big Springs Golf Course
Seneca Village
Seneca Village No. 2
Kingsley
15
24
6
33
Bowman Field Airport Area Safety Program
Area of Potential Effect w/ Approach Surface
Approach Surface
Current and Near Term Penetrations Approach Surfaces
Recommended APE
Neighborhood Boundary
Easement Required
Right of Way
0
800
Feet
9/22/2015

MEMO From Katherine Andrus

Federal Aviation Administration

Memorandum

Date: July 8, 2016

To: Phillip J. Braden, Manager, Memphis Airports District Office

From: Katherine Andrus, Federal Preservation Officer, AEE-400 KBA

Subject: Updated Review of Findings Under Section 106 of the National Historic Preservation Act for the Bowman Field Airport Area Safety Program

The FAA is considering the grant application of the Louisville Regional Airport Authority (LRAA) for funding to address obstructions to air navigation posed by trees that penetrate the critical Terminal Instrument Procedure (TERPS) approach surfaces of Bowman Field Airport. The LRAA proposes to acquire avigation easements for the trimming or removal and replacement of trees that have or may become an obstruction to the TERPS Approach Surfaces to Runways 06, 15, 24 and 33. The FAA's Airports District Office followed the process set forth in regulations at 36 CFR part 800 and in FAA guidance to evaluate the effect of this undertaking on historic properties, and proposed a finding of "No Adverse Effect."

As the FAA's Federal Preservation Officer, I reviewed the basis and justification for this finding and provided you with a memorandum dated June 17, 2016. Subsequent to transmitting that memorandum, the FAA received comments from consulting parties on the proposed finding. I appreciate the information and views provided by the consulting parties; however, after a thorough review and reconsideration of my earlier analysis in light of those comments I am confirming my initial conclusion that the proposed finding of "No Adverse Effect" is appropriate and consistent with the requirements of the applicable regulations and guidance. I have amended the analysis below to reflect the additional information provided by consulting parties since my previous memorandum.

I reviewed the final Cultural Resources Evaluation (CRE) and supplement prepared by Brockington and Associates, Inc. as well as information provided during the consultation process. This included a report dated October 21, 2015 prepared by David L. Ames on behalf of Plea for the Trees ("Ames Report"). In addition, I reviewed other available materials such as the National Register of Historic Places Multiple Property Documentation Form for the historic context of "Suburban Development in Louisville and Jefferson County, 1868-1940; the National Register nominations for Bowman Field and the Olmsted Park System; and the Louisville Survey East Report. Although I was

not able to conduct a site visit, I supplemented the photographic documentation in the CRE with Google Maps Street View, which afforded a visual survey of near-current conditions.

I have not reviewed information on Seneca Park in the files of the Louisville Metro Parks and Recreation Department, the Filson Historical Society, the Olmsted National Historical Site in Brookline, MA or the Library of Congress, as suggested by the Louisville Olmsted Parks Conservancy and several other consulting parties. This type of archival research, while extremely valuable for scholarship and preservation purposes, goes well beyond the "Reasonable and Good Faith" identification standard for Section 106 review in 36 CFR §800.4(b)(1). I note that I studied landscape history at Boston University as part of my Masters in Preservation Planning and worked with the Massachusetts Association of Olmsted Parks, the Olmsted National Historic Site, and many of the leading scholars cited in the comments submitted by consulting parties, so I am conversant with the work of Frederick Law Olmsted and his successor firm, Olmsted Brothers. I was able to bring this knowledge to bear on my evaluation of eligibility of Seneca Park for the National Register of Historic Places and the implications of its potential eligibility on the assessment of effects.

I was guided in my evaluation of the eligibility of these properties and the characteristics that would qualify each historic property for inclusion in the National Register by National Register Bulletins "*How to Apply the National Register Criteria for Evaluation*," "*How to Complete the National Register Registration Form*," "*How to Evaluate and Nominate Designed Historic Landscapes*" and "*Historic Residential Suburbs – Guidelines for Evaluation and Documentation for the National Register of Historic Places*." I then applied the Advisory Council's regulatory definition of effect and criteria for adverse effects to reach a conclusion about the impact of this undertaking on each of these properties.

Identification of Historic Properties

In conducting its review of historic properties, the FAA is guided by the Advisory Council on Historic Preservation's *Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review*. The LRAA, as project sponsor, commissioned Brockington and Associates, Inc., a subcontractor to Hanson, Inc., to prepare the CRE. An initial draft was completed in December of 2014. The FAA proposed an Area of Potential Effect (APE) in September 2015; after further consultation and input from the consulting parties, the FAA proposed a revised APE on March 18, 2016; the KHC concurred on April 7, 2016. Based on input from consulting parties and the revised APE, a supplement to the CRE was issued in March 2016. The final CRE and supplement, along with additional material provided by consulting parties, informed the FAA's proposed findings with respect to the eligibility of properties for the National Register of Historic Places.

One property, the **Bowman Field Historic District**, is listed in the National Register. The CRE recommended seven additional properties as eligible for the National Register: **Seneca Golf Course** and the neighborhoods of **Seneca Vista, McCoy Manor, Seneca Manor, Kingsley, Seneca Village** and **Seneca Village No. 2**. The supplement identified an additional neighborhood, **Hathaway**, and recommended it as National Register-eligible. I agree with these recommendations as discussed below. I also agree with the recommendation that Big Spring Country Club is not eligible for the National Register, due to extensive alterations in the first decade of the 21st century.

For purposes of evaluating the effect of this undertaking it is important to identify the characteristics that make each property potentially eligible for the National Register. The CRE contains a thorough description of these properties and a discussion of their historic significance. Consulting party comments emphasize the contribution of the landscape to the historic setting of the neighborhoods and to the significance of Seneca Park. I have considered these characteristics in assessing the effects of the undertaking on these resources. Consulting parties also raised questions about the appropriate periods of significance, boundaries and contributing status of infill parcels; I considered each of these comments and concluded that any changes to the eligibility analysis in these areas would not affect the assessment of effects. Similarly, I considered the recommendation of Dr. Ames and several consulting parties that much larger areas be evaluated as potential historic districts. Although these larger potential districts may also be eligible, it was unnecessary to evaluate them because the all of the relevant properties within the APE are already being treated as eligible and there is no indication that viewing these areas as part of a larger district would change the assessment of effects. Additional analysis and documentation, including boundary justifications, would be required to nominate these properties to the National Register, which is beyond the scope of this identification effort.

Many of the consulting parties have requested further investigation and documentation of the history and significance of these resources, particularly Seneca Park. Nothing in the FAA's assessment or findings would preclude further research or the future nomination of Seneca Park or any of the historic neighborhoods to the National Register of Historic Places; and the documentation supporting the FAA's findings, which has been made publicly available, could be useful in this effort. However, under Section 106, the FAA is not obligated to conduct additional research on these properties or pursue their nomination to the National Register. In keeping with the FAA's standard practice, we rely on 36 CFR § 800.4(c)(2), which states that "if the agency official determines any of the criteria are met and the SHPO/THPO agrees, the property shall be considered eligible for the National Register for section 106 purposes. If the agency official determines that the criteria are not met and the SHPO/THPO agrees, the property shall be considered not eligible." (These regulations also provide for the agency official to obtain a determination of eligibility from the Keeper of the National Register where there is disagreement between the agency and the SHPO/THPO, or if the ACHP or Secretary of Interior so request.) In this case, the FAA and the KHC have reached general agreement on the nature and location of eligible properties. Consulting parties have not raised any

objections to the eligibility of these properties, and have not identified any additional resources as potentially eligible (as discussed above, in some cases consulting parties have suggested larger districts encompassing one or more of the eight properties identified, but none of these would result in additional historic properties within the APE and would not affect the assessment of effects). The FAA is treating these eight properties as eligible for purposes of this Section 106 review.

Assessment of Effects

36 CFR § 800.16(i) defines "effect" as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." In order to determine if historic properties may be affected by an undertaking, it is necessary to understand the characteristics that make it significant. Because this undertaking involves tree-trimming and removal, I focused my analysis on the contribution of landscape elements, and particularly trees, to the characteristics and setting of each property and specifically whether the proposed removal of trees would alter the characteristics of each historic property in the APE that qualify it for the National Register. I have highlighted those characteristics in the following discussion of effects on each of these properties.

The effect of an undertaking is *adverse* if it alters any of the characteristics that qualify the property for inclusion in the NRHP in a way that diminishes the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. 36 CFR § 800.5(a)(1). Examples of adverse effects include changes to "physical features within the property's setting that contribute to its historic significance." 36 CFR § 800.5(a)(2)(iv). I specifically considered whether removal of these trees would affect the integrity of the landscape setting.

I examined the eight identified properties and reached a conclusion for each one based on its characteristics and the trees proposed to be removed or trimmed in that area. I have provided a separate analysis for each property below.

Seneca Golf Course appears eligible for listing as a district under Criterion A for its association with the Works Progress Administration (WPA). Three buildings dating from the 1930s – the clubhouse, the old caddy shack, and the maintenance building – are contributing elements to this potential district.

The golf course itself, which has been significantly altered since its completion in 1934, does not appear to have retained sufficient integrity of design, materials or workmanship to make it a contributing element of the Seneca Golf Course Historic District or to be individually eligible as a site under Criterion C. (Note that "landscape" is not a separate property type defined under National Register regulations – historic landscapes must be listed as a site, as a district, or as a contributing element of a district.)

The Louisville Olmsted Parks Conservancy states that the Golf Course was an element of the original Olmsted design, but did not provide documentation of this original design. As mentioned, I did not have access to the archives that might contain the original Olmsted Brothers plan for Seneca Park and I was not able to locate a copy via the Internet. Although the original design of Seneca Golf Course was not available for this analysis, there is evidence that the course layout was substantially redesigned at least once within the past 50 years and the property boundaries were changed as part of construction of I-64 in the late 1960s. Even if the 1955 "new layout" were considered significant in its own right, it has been dramatically altered.

National Register guidance notes that features that a designed historic landscape must retain will differ for various landscape types, but may include spatial relationships, vegetation, original property boundary, topography/grading, site furnishings, design intent, architectural features, and circulation system. (*Designed Historic Landscapes*, p. 6). In the case of the Seneca Golf Course, the course does not appear to retain its original vegetation, boundaries, grading, or design intent. For a golf course, the design intent (i.e., the layout of the holes and greens) is of particular significance, because it distinguishes this type of landscape from a park or other open expanse of turf. The original design intent has been compromised by changes to the course layout and a change in how vegetation is used to frame holes.

National Register guidance acknowledges that vegetation, although an important feature of most landscapes, is not stable and is always changing by season, maturation, pruning, removal, neglect, and other forces, but cautions that it is first necessary to determine that the more stable elements of the designed landscape are sufficiently intact to represent the original design intent. (*Designed Historic Landscapes*, p. 7) In this case, the most stable element of the landscape design – the layout of the course – has been altered. Furthermore, historic aerial photographs show that the earlier layout featured an open expanse for play, with limited vegetation and few trees. Much of the current vegetation was planted in the past three decades to provide screening for errant shots for greater player safety between holes. However, while the features of the golf course have been altered, it continues to provide an appropriate setting for the group of buildings, and might be included in the boundaries of a district encompassing the associated buildings.

The Golf Course is located within Seneca Park, one of 18 parks and 6 parkways that make up the Louisville park system, and the last component of the system to be designed by the Olmsted landscape architecture firm. The original components of the Louisville park system, consisting of Cherokee, Iroquois and Shawnee Parks and Algonquin, Eastern, Northwestern, Southwestern and Southern parkways, were listed in the National Register as "The Olmsted Park System" in 1982. The nomination does not mention Seneca Park. F.L. Olmsted & Co. received the commission for the Louisville park system in 1891, and Frederick Law Olmsted was personally involved in in the development of the Master Plan and the first three components of the park system (Cherokee, Iroquois and Shawnee Parks). After his retirement in 1895 and death in 1903,

the continuing development of the Louisville park system, including the development of Seneca Park in 1928, was overseen by his successor firm, Olmsted Brothers, which consisted of his stepson/nephew, John Charles Olmsted and his son, Frederick Law Olmsted, Jr. John Charles Olmsted died in 1920, so the 1928 plan for Seneca Park would have been overseen by Frederick Law Olmsted, Jr., who in addition to carrying on the legacy and vision of his father was an important figure in landscape architecture in his own right.

The Louisville Board of Parks Commissioners purchased 540 acres to expand park space in 1928. This property included 200 acres that had been leased for use as an airfield to Abram H. Bowman, an aviation enthusiast, who began offering airplane rides to the public from this site in approximately 1919. In 1922 Bowman's lease on the property was taken over by the U.S. Army and Bowman Field, a military/civilian facility, was formally dedicated on August 25, 1923. (See National Register nomination for Bowman Field and *Aviation: From Sand Dunes to Sonic Booms, A National Register of Historic Places Travel Itinerary* at https://www.nps.gov/nr/travel/aviation/bow.htm) . Upon purchase of the larger property, the Louisville Parks Commissioners leased 200 acres to Bowman Field and commissioned the Olmsted Brothers firm to design a park on the remainder. This property was expanded two years later to connect Seneca Park to Cherokee Park. According to the Louisville Olmsted Parks Conservancy's web site: "The design plan for Seneca was in stark contrast to neighboring Cherokee Park because of its formal style and also because the plan included an 18-hole golf course along with many other recreation facilities." (http://www.olmstedparks.org/our-parks/seneca-park/) Its history and development is closely linked to that of Bowman Field and played a role in the subsequent suburban development of the area. It is likely that Seneca Park is eligible for listing in the National Register, either individually or as part of the Louisville park system, under criteria A and C.

The Golf Course might be included in the boundaries of a historic district encompassing the entirety of Seneca Park. According to the Louisville Olmsted Parks Conservancy, the Golf Course was an element of the original Olmsted design (presumably the 1928 Olmsted Brothers plan for Seneca Park rather than the 1891 Master Plan), but it is unclear whether it was actually laid out at that time. Other evidence indicates that it was laid out in 1933 and completed in 1934. It is possible that the Olmsted Brothers 1928 plan indicated a golf course but that the specific layout of the holes was left to others to design. Even assuming that it formed an integral part of the original Seneca Park, the Golf Course's loss of integrity would likely render it non-contributing as a designed landscape element to a larger potential historic district encompassing the entire park. Due to the extensive alterations in the 1960s, the Golf Course does not reflect the original design intent or plant material. The current vegetation of Seneca Park – consisting of open areas of mown grass punctuated by stands of trees –is in keeping with the overall character of Seneca Park and might be viewed as part of the setting of the larger park.

Consulting parties also pointed out that Pee Wee Reese Road forms part of the original automotive corridor or concourse associated with Seneca Park. This may be a contributing element to a potential Seneca Park Historic District. Because the only portion of Pee Wee Reese Road within the APE runs along the border of the Seneca Vista subdivision, I have addressed effects to Pee Wee Reese Road in my assessment of effects to Seneca Vista, below.

The LRAA proposes removing approximately 34 trees within Seneca Golf Course. My assessment of the effects of the undertaking on the characteristics of the portion of the park within the APE is the same whether the Golf Course is considered as a discrete district or as part of a larger district encompassing the entire park. Based on what is known about the historic characteristics of the landscape during its period of significance (1928/1934 – c.1966), trees in the APE are not character-defining features of the property qualifying it for the National Register. Therefore, I conclude that the undertaking would have ***no effect*** on Seneca Golf Course or on Seneca Park as a whole.

Subdivisions

The remaining seven properties are subdivisions laid out between 1925 and 1951, and reflect various phases in the suburban development of Louisville. The Ames Report suggests organizing these areas into two suburban properties: Garden Suburb and Early Freeway. National Register guidelines identifies legally recorded boundaries of a subdivision as a factor to consider in establishing the boundaries of a historic district (*How to Complete the National Register Registration Form*,p. 57); but elsewhere notes that "[f]or residential suburbs that developed in several stages . . . boundaries are generally drawn to encompass the largest area that took form during the historic period and that possesses historic importance." (*Historic Residential Suburbs*, p. 107). Although these neighborhoods share a broad historic context, they have different dates of platting and construction (and therefore different periods of significance) and were developed by different companies, and boundaries could be justified based on the historic subdivision plats. Expanding the identification of historic properties to encompass neighborhoods outside the APE would go beyond the "reasonable and good faith" identification standard under Section 106, which defines the geographic limits of federal responsibility as the APE and does not require that the agency search for all historic properties in a given area. (*Meeting the "Reasonable and Good Faith" Identification Standard in Section 106 Review*, p. 3). Therefore, for the purposes of Section 106 I have treated these areas as distinct districts and assessed effects on each individual subdivision taking into consideration any distinctive characteristics. I did consider whether any of my findings regarding eligibility or effects would be affected by viewing these properties as part of a larger district and concluded that the overall outcome would be the same.

National Register guidance on Historic Residential Suburbs explains that subdivision developments can be "read" as a series of layers imprinted on the land: The first layer is geographical location and its relationship to natural topography and cultural factors; the

second is the subdivision design, and the third is the arrangement of elements on each lot, including buildings, driveways, fences and plantings. (*Historic Residential Suburbs*, p. 8). This guidance cross-references the National Register guidance on Designed Historic Landscapes discussed above, which suggests that if the more stable elements of the designed landscape are sufficiently intact, the relevant question is whether the existing vegetation taken as a whole reinforces or supports the original design intent. (*Designed Historic Landscapes*, p. 7)

The first and second layers of all of these subdivisions can still be easily read. They were laid out on land that was previously in agricultural use, adjacent to or near Bowman Field. The growing transportation network, including the airfield, the extension of the streetcar lines, and the roadways contributed to the development of this area. The construction of both the airport and the subdivision was made easier by the relatively flat land cleared of virgin forest (see historic context "*Agriculture in Louisville and Jefferson County, Kentucky 1800-1930*" Multiple Property Documentation Form, Addendum to Context (1990), Section E, p.11). Each of the subdivisions retains its spatial organization including its original street layout and circulation, lot sizes and set-backs.

The third layer – the overall arrangement of elements within this design – is generally consistent with the character of early-to-mid-20th century suburbs. There is no evidence of an original planting scheme for any of the subdivisions; rather, the vegetation appears to have been planted by property-owners over time and likely has evolved with changing tastes and availability of plant material. In this respect, the subdivisions evaluated here are probably best understood as designed historic landscapes, in the form of subdivisions, overlaid with a vernacular landscape in the form of residential plantings.

National Register guidance on designed historic landscapes suggests the following questions as relevant to evaluating the integrity of a designed historic landscape: 1) To what degree does the landscape convey its historic character? 2) To what degree has the original fabric been retained? 3) Are changes to the landscape irrevocable or can they be corrected so that the property retains integrity? (*Designed Historic Landscapes*, p. 6). Each of these subdivisions still conveys its historic character, with much of the original hardscaping and architectural elements intact. To the extent that trees or other plant material have been changed or removed, these are reversible changes that have not irrevocably changed the character of the neighborhoods.

The current landscape in all of these districts consists of mown lawns, flower beds and foundation plantings and a broad variety of ornamental shrubs and trees. Some lots have hedges marking property lines or bordering the street, but most houses are set on open lawns that merge into one another, forming a continuous park-like expanse characteristic of suburban landscapes of this era. Low-canopy trees or large shrubs typically are planted on front and side lawns; taller shade trees are found primarily in backyards or in open areas along the streets and other public-rights-of-way. Most of these appear to have been planted as specimen trees on lawns or in regular intervals along streets, though others are

likely "volunteers" that have grown up in less-intensively landscaped areas as part of a natural succession. Some of the taller trees show evidence of pruning to avoid interference with utility lines, particularly those along the streets.

National Register guidance explains that a designed historic landscape need not exist today exactly as it was first executed if integrity of location and visual effect has been preserved. Moreover, if the more stable elements of the designed landscape are sufficiently intact to represent the original design intent, the absence of original vegetation may not diminish integrity if the same or similar species of appropriate size have been replanted to replace dead, diseased or mature specimens. (*Designed Historic Landscapes*, p. 7). The historic character and setting of these subdivisions is the result of a variety of trees, shrubs and open lawn, rather than the contribution of specific trees or types of trees. The species and age of individual trees is therefore less important than the overall effect. To the extent that tree species or type is relevant, ornamental non-native cultivars of low-canopy trees are as likely to be in keeping with the historic character of these subdivisions as native species.

Although most of the plant material does not appear to be original, changes over time in the plantings are consistent with the natural and expected cycle of growth, and the existing vegetation taken as a whole reinforces the original design intent of a "Garden Suburb." The layout of streets, lawns and vegetation in each of these subdivisions forms "an open, parklike setting" creating a semi-rural environment within commuting distance of Louisville. (*Historic Residential Suburbs*, p. 103)

The distinguishing characteristics of each subdivision are described below.

South of Seneca Golf Course and immediately west of Bowman Field at the end of Runway 6 three subdivisions – Seneca Vista, McCoy Manor and Seneca Manor – make up what is today called the Seneca Gardens Neighborhood. Because these were developed as individual subdivisions we evaluated them separately.

Seneca Vista, platted in 1937 and developed through the early 1940s, appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of early automobile suburban development in Louisville, and under Criterion C in the area of architecture and landscape design as a collection of early to mid-twentieth century residential architecture set within a street and lot pattern representative of suburban development of the pre-World War II era. The district may also be eligible under Criterion B for its association with developer William H. Randolph, whose career made a significant impact on the built environment of suburban Louisville.

The eastern boundary of Seneca Vista is Pee Wee Reese Road, which forms part of the original parkway associated with Seneca Park, and could be included in a potential Seneca Park Historic District. The road is bordered by mown grass, punctuated by trees

and shrubs. Although some stretches of the road are planted with species trees at regular intervals, the portion within the APE is more open and varied, with low shrubs planted along the airport fence line on one side and a mix of large shrubs, low-canopy and high-canopy trees on the other side.

There are no sidewalks either in the original plan or today. The platted design for the extension of Gladstone Avenue, which would have connected through to Drayton Avenue to form a curvilinear spine of the subdivision, was never implemented and the public rights-of-way for the unbuilt avenue have been maintained as green space. Seneca Vista features uniform setbacks and lot sizes, with some broader lots along Landor Avenue. Nine lots purchased by Jefferson County early in the development of Seneca Vista to protect airspace for Runway 6 flight paths are maintained as a strip of mown grass edged by trees forming an allée; however, this was not part of the original layout of the subdivision and is not a design feature characteristic of this type of cultural landscape. There is evidence that trees were a valued feature early in the development of Seneca Vista – the deed conveying the nine lots for airport easements stipulated that "the only tree to be destroyed is the burnt one. Other [trees] shall not be trimmed lower than the top of the Evans house."

The general contribution of trees to the park-like setting of Seneca Vista, one of the characteristics qualifying it for the National Register, leads me to conclude that trimming or removal of any trees would affect this historic property. The next step is to determine if that effect is adverse – that is, if it diminishes the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Within Seneca Vista, 29 parcels are already subject to an avigation easement that has meant periodic trimming or removal of tall trees. The addition of eight additional parcels being placed under avigation easement and the subsequent trimming or removal of approximately 17 of the tallest trees would not affect the location, design, materials, workmanship or association of this district and would not alter the setting or feeling to the point of diminishing its integrity. The undertaking would not eliminate the mature tree canopy throughout the property or eradicate any species of tree, and would not replace trees with open lawn, shrubs or hardscaping. Rather, the undertaking will result in a change in the mixture of tree species, age and height which is consistent with the natural cycle and historic pattern of this landscape. The fact that the remaining vegetation and replacement plantings will continue to provide an appropriate park-like setting supports a finding of ***no adverse effect*** on Seneca Vista.

Seneca Manor, like Seneca Vista, was platted in 1937, but its development occurred more gradually over a longer span through the mid-1950s. It appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of early automobile suburban development in Louisville, and under Criterion C in the area of architecture and landscape design as a collection of early to mid-twentieth century residential architecture set within a street and lot pattern representative of

suburban development of the pre- and post-World War II era. The subdivision consists of 21 individual single-family residences on Valetta Road and two parcels on Taylorsville Road, with mid-twentieth century residential architecture, mostly two-story Colonial Revivals and a few one-story Colonial Revival homes. The lots in the immediate vicinity of Taylorsville Road include some later infill, including examples of Ranch and Split Level. The neighborhood does not have sidewalks. Oak trees planted at regular intervals along a portion of Valetta Road may be part of a formal planting scheme, although it is uncertain if this was original to the subdivision design.

Only one tree has been identified as requiring trimming or removal, and the LRAA is proposing placing a single parcel under an avigation easement. The general contribution of trees to the park-like setting of Seneca Manor, one of the characteristics qualifying it for the National Register, leads me to conclude that trimming or removal of any trees would affect this historic property. However, this action will not affect the location, design, materials, workmanship or association of this district and will not alter the setting or feeling to the point of diminishing its integrity. The Safety Program would have ***no adverse effect*** on Seneca Manor.

McCoy Manor, platted in 1949 as infill between Seneca Vista and Seneca Manor and developed over the next eight years, appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of post-World War II and Early Freeway suburban development in Louisville, and under Criterion C in the area of architecture and landscape design as a collection of mid-twentieth century residential architecture set within a street and lot pattern representative of suburban development of the post-World War II era. The buildings consist of small-scale mid-twentieth century homes constructed of brick, brick with Bedford stone highlighting, or all Bedford stone. Each property features a driveway as well as a front walk connecting the front of the house with either the driveway or the street; there are no sidewalks. Trees are generally smaller and set back further from the street than in Seneca Vista or Seneca Manor.

No trees within McCoy Manor have been identified as requiring trimming or removal and none of the parcels are proposed for avigation easements. Therefore, this undertaking would have ***no effect*** on McCoy Manor.

Kingsley, located south of Seneca Gardens on the other side of Taylorsville Road, was one component of a broader development platted in 1925. Development occurred regularly through the 1930s and into the 1950s. It appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of suburban development in Louisville spanning the Streetcar to Early Freeway Era, and under Criterion C in the area of architecture and landscape design as a collection of early to mid-twentieth century residential architecture set within a street and lot pattern representative of suburban development of the pre- and post-World War II era. The district may also be eligible under Criterion B for its association with developer C.C.

Hieatt, whose career made a significant impact on the development of suburban Louisville.

The Kingsley neighborhood generally consists of detached one-to-two story single-family residences in a park-like setting. Building styles include Bungalow, Cape Cod, Colonial Revival, Tudor Revival, Minimal Traditional and Ranch. Building materials largely consist of brick, rusticated limestone, and some replacement vinyl siding in gabled ends. The subdivision layout employs a system of curvilinear streets, sidewalks and a centralized public park planted with specimen trees.

No trees within Kingsley have been identified as requiring trimming or removal and none of the parcels are proposed for avigation easements. Therefore, this undertaking would have ***no effect*** on Kingsley.

Farther to the east along Taylorsville Road and directly south of Bowman Field at the end of Runway 33 are three more subdivisions: Hathaway, Seneca Village and Seneca Village No. 2.

Hathaway was laid out in 1926, but the housing appears to have been constructed post-World War II. It appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of post-World War II and Early Freeway suburban development in Louisville, and under Criterion C in the area of architecture and landscape design as a collection of early to mid-twentieth century residential architecture set within a street and lot pattern representative of suburban development of the pre- and post-World War II era. The building stock consists of small-scale brick houses in a Cape Cod or Cape Cod/front gable form. Brick or concrete walkways lead from the front doors to narrow driveways; the subdivision does not have sidewalks but many lots have paved parking pads along the street.

No trees within Hathaway have been identified as requiring trimming or removal and none of the parcels are proposed for avigation easements. Therefore, this undertaking would have ***no effect*** on Hathaway.

Seneca Village was platted in1929 but construction did not begin until after the war and then it developed rapidly, with all lots were built out by 1951. It appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of post-World War II and Early Freeway suburban development in Louisville, and under Criterion C in the area of architecture and landscape design as a collection of mid-twentieth century residential architecture set within a street and lot pattern representative of suburban development of the pre- and post-World War II era. A total of 64 homes built in four or five designs similar to the Hathaway development make up the housing stock. Unlike Hathaway, Seneca Village has sidewalks set off from the street by a wide strip of mown grass. Lots along the east side of Seneca Boulevard and Taylorsville Road between Seneca Boulevard and Kent Road were purchased by the

airport and never developed. They have been maintained as open lawn to protect airspace for Runway 33.

The LRAA proposes placing another 23 parcels under avigation easements, with the subsequent trimming or removal of approximately 26 of the tallest trees. The contribution of trees to the park-like setting of Seneca Village, one of the characteristics qualifying it for the National Register, leads me to conclude that trimming or removal of any trees would affect this historic property. Ten to twelve parcels within Seneca Village are owned by the LRAA and an additional four have existing avigation easements. The addition of 23 more lots placed under avigation easements and the subsequent trimming or removal of trees would not affect the location, design, materials, workmanship or association of this district. The undertaking would not eliminate the mature tree canopy throughout the property or eradicate any species of tree, and would not replace trees with open lawn, shrubs or hardscaping. Rather, the undertaking will result in a change in the mixture of tree species, age and height which is consistent with the natural cycle and historic pattern of this landscape. The remaining vegetation and replacement plantings will continue to provide an appropriate park-like setting, supporting a finding of ***no adverse effect*** on Seneca Village.

Seneca Village No. 2, was platted and developed in 1948 with revisions in 1950 and 1951. Development occurred rapidly between 1951 and 1955, and the apartment buildings in the northern quadrant were completed by 1959. Despite the demolition of 31 houses along Gardner Lane for the widening of Watterson Expressway in the late 1980s, Seneca Village No. 2 appears eligible for listing as a district under Criterion A in the area of community planning and development as an example of post-World War II and Early Freeway suburban development in Louisville, and under Criterion C in the area of architecture and landscape design as a collection of early to mid-twentieth century residential homes utilizing a new form of mass-produced pre-fabricated housing set within a street and lot pattern representative of suburban development of the post-World War II era. The neighborhood consists of pre-fabricated Gunnison housing, with a limited number of styles and floor plans. The houses along Joan Avenue and Betty Lane feature brick siding (partial or whole) and somewhat larger lots. In general, the homes have a Cape Cod form. Bradford Pear trees, planted c. 1990, line several of the streets within the neighborhood.

The Safety Program would place nine parcels under avigation easements, and requiring the trimming or removal of approximately 10 trees. The general contribution of trees to the park-like setting of Seneca Village No. 2, one of the characteristics qualifying it for the National Register, leads me to conclude that trimming or removal of any trees would affect this historic property. However, this action will not affect the location, design, materials, workmanship or association of this district. The undertaking would not eliminate the mature tree canopy throughout the property or eradicate any species of tree, and would not replace trees with open lawn, shrubs or hardscaping. Rather, the undertaking will result in a change in the mixture of tree species, age and height which is

consistent with the natural cycle and historic pattern of this landscape. The fact that the remaining vegetation and replacement plantings will continue to provide an appropriate park-like setting supports a finding of ***no adverse effect*** on Seneca Village No. 2.

Conclusion

Based on the foregoing considerations, I agree with the proposed finding that the Bowman Field Airport Area Safety Program would have ***no adverse effect*** on any historic property.