



*Preserving America's Heritage*

**Advisory Council on Historic Preservation  
Electronic Section 106 Documentation Submittal System (e106) Form  
MS Word format**

**Send to: *e106@achp.gov***

**I. Basic information**

- 1. Name of federal agency** (If multiple agencies, state them all and indicate whether one is the lead agency):

Federal Highway Administration

- 2. Name of undertaking/project** (Include project/permit/application number if applicable):

NCDOT STIP# I-2513, FA# MANHF-26-1(53)

- 3. Location of undertaking** (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

Asheville, Buncombe County, North Carolina

- 4. Name and title of federal agency official and contact person for this undertaking**, including email address and phone number:

Mr. Edward T. Parker, Acting Division Administrator,

310 New Bern Avenue, Suite 410, Raleigh, NC 27601

Contact Person: Mr. Felix Davila, (919) 747-7021 E-mail: [felix.davila@dot.gov](mailto:felix.davila@dot.gov)

- 5. Purpose of notification.** Indicate whether this documentation is to:

- notify the ACHP of a finding that an undertaking may adversely affect historic properties, and/or

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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Phone: 202-517-0200 □ Fax: 202-517-6381 □ [achp@achp.gov](mailto:achp@achp.gov) □ [www.achp.gov](http://www.achp.gov)

- invite the ACHP to participate in a Section 106 consultation, and/or
- propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3).

## **II. Information on the Undertaking\***

### **6. Describe the undertaking and nature of federal involvement** (if multiple federal agencies are involved, specify involvement of each):

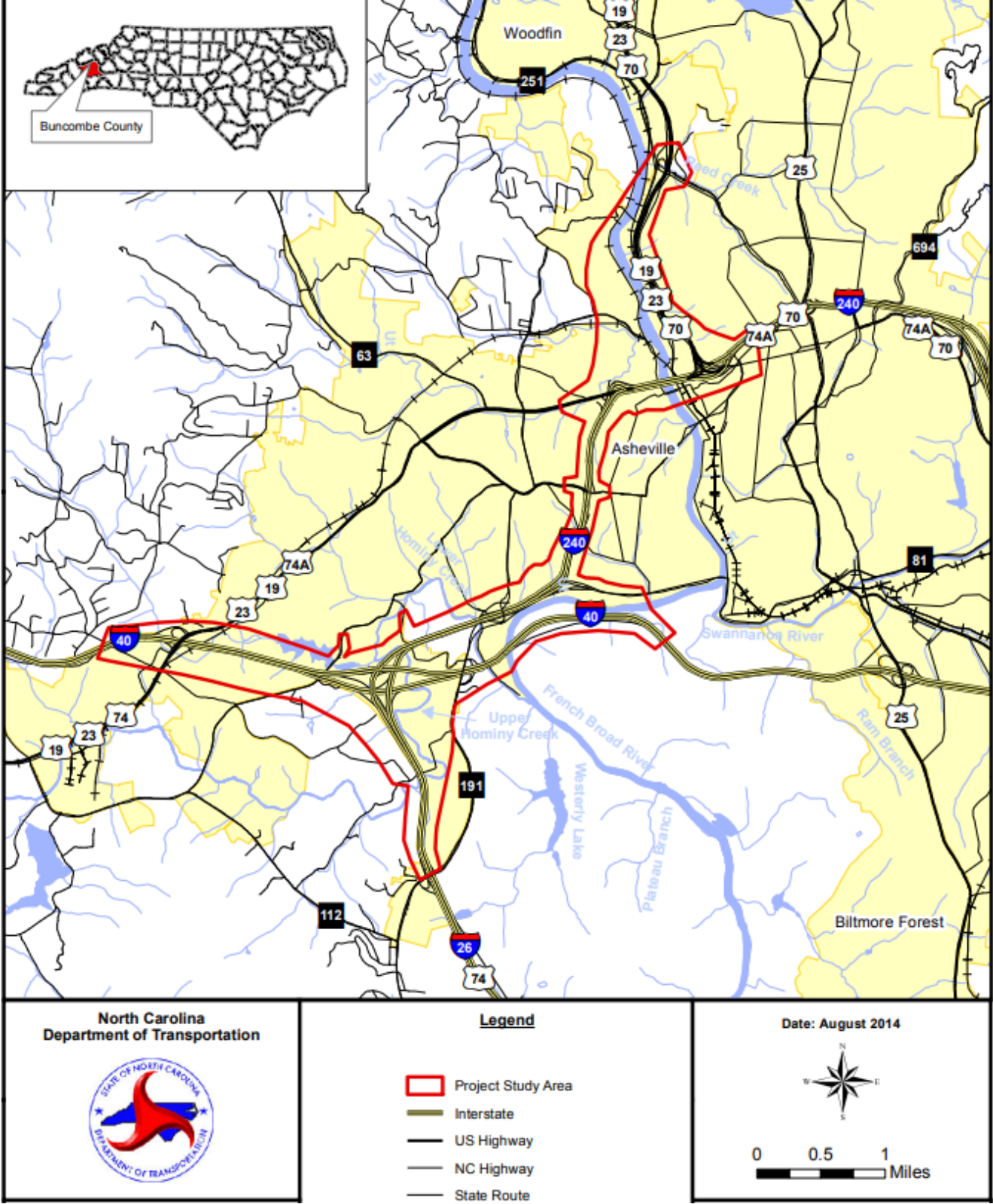
The undertaking/proposed project is located in Asheville, North Carolina, within Buncombe County and commonly referred to as the I-26 Connector. It is intended to provide a link between existing I-26 south of Asheville and US 19-23-70 north of Asheville, filling an existing gap in the I-26 Corridor. The primary purposes of the proposed project are:

- Upgrade the interstate corridor from I-26 south of Asheville through the US 19-23 interchange to meet design standards for the interstate system
- Provide a link in the transportation system connecting a direct, multi-lane freeway facility meeting interstate standards from the Port of Charleston, South Carolina, to I-81 near Kingsport, Tennessee
- Improve the capacity of existing I-240 west of Asheville to accommodate the existing and forecasted (2040 design year) traffic in this growing area
- Reduce traffic delays and congestion along the I-240 crossing of the French Broad River, which currently operates at capacity
- Increase the remaining useful service of the existing Captain Jeff Bowen Bridges by substantially reducing the volume of traffic on this vital crossing of the French Broad River

FHWA is providing funding for the project and is the lead Federal agency for the project. NCDOT has coordinated with the US Army Corps of Engineers, US Fish and Wildlife Service, and the US Environmental Protection Agency throughout the planning phase of this project.

### **7. Describe the Area of Potential Effects:**

The Area of Potential Effects (APE) for the project generally encompasses the Project Study Area as illustrated below. It includes the proposed improvements to I-40 and I-26 west and south of Asheville, the widening of I-240, and the construction of a new connection to US 19/23/70 to the north of Asheville. The project limits extend approximately five miles and the full extent of the APE has been intensively surveyed over many years for both historic architectural and archaeological resources.



## **8. Describe steps taken to identify historic properties:**

### Historic Architecture

A Historic Architectural Resources Survey Update Report was prepared for this project in March 2015 based on previous historic architectural resources survey reports from 1999, 2001, and 2006. All surveys were conducted with the following goals: (1) to determine the historic architectural area of potential effects (APE) for the project, (2) to identify all resources of at least 50 years of age within the historic architectural APE; and (3) to evaluate these resources according to NRHP criteria (36 CFR 60). The results of the 2015 survey confirmed there are fifteen listed or eligible resources in the APE as well as one National Historic Landmark. The North Carolina State Historic Preservation Office (NC HPO) concurred with these findings in a letter dated April 24, 2015. An additional report was generated in June 2016 to evaluate the Burton Street neighborhood at the residents' request. The report found that the neighborhood did not qualify as a NRHP-eligible property or district and the NC HPO concurred via letter dated July 21, 2016.

### Archaeology

Prior to archaeological field work, the Eastern Band of Cherokee Indians (EBCI) were asked to participate as a consulting party in a letter from NC DOT dated March 4, 2004. The Biltmore Estate was also asked to participate. Meetings with the Biltmore Estate were held on January 24 and April 19, 2006, to discuss the proposed impacts to the Biltmore Estate properties and access to these properties. A systematic and intensive archaeological survey was performed in 2005 and 2006. That survey relocated or identified 29 archaeological resources (28 sites and one isolated find) within the proposed APE for the project's alternatives. Of these, four sites (31BN623, 31BN825, 31BN826, and 31BN828) are eligible for the National Register of Historic Places (NRHP). Also, seven other archaeological sites (31BN814, 31BN823, 31BN867, 31BN868, 31BN870, 31BN871, and 31BN873) will require additional investigations to provide conclusive recommendation regarding their eligibility, should they be impacted by the project. Additional investigations may consist of limited mechanized stripping or deep trench testing. While stripping and deep trench testing would normally have been conducted as part of the initial investigation, it was postponed due to the uncertainty concerning the choice of the project alternative. Finally, additional geomorphic investigations were recommended for eleven other locations within the project area for further study, which could not be fully investigated due to deep alluvium deposits or fill material. Copies of the technical report were provided to the Biltmore Estate, EBCI, NC HPO, Tennessee Valley Authority (TVA), and United States Army Corps of Engineers (USACE) for review and comments. In a letter dated September 10, 2007, NC HPO concurred with the eligibility of the four sites and the recommendation of additional testing. EBCI also concurred in a letter dated June 16, 2008. From 2015 to 2018 it was determined upon review of the design plans that only one of the sites (31BN826) will be adversely affected. Sites 31BN825 and 31BN828 are to be avoided during the construction phase, while a "No Adverse Effect" was determined for 31BN623. Additional investigations (limited mechanized stripping or deep trench testing) are also needed at four other sites (31BN823, 31BN868, 31BN870, and 31BN873) in order to provide conclusive eligibility recommendations since ground-disturbing activities are planned at these locations. Only a minimal portion of these sites will be impacted by the project. Lastly, deep testing is required in five locations covering approximately 22 acres in order to remove historic alluvium or fill material.

**9. Describe the historic property** (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

Historic Architecture Listed and Eligible Resources

<b>Resource Name</b>	<b>Status</b>	<b>Significance</b>
<b>Biltmore Estate</b>	National Historic Landmark	Criteria A, B, & C
<b>Asheville School</b>	NR-Listed	Criteria A & C
<b>Buncombe Bridge 216</b>	NR-Eligible	Criterion C
<b>Calvary Baptist Church</b>	NR-Eligible	Criterion C
<b>Baker Building (formerly Friendly Grocery Store)</b>	NR-Eligible	Criteria A & C
<b>West Asheville/Aycock School Historic District</b>	NR-Listed	Criteria A & C
<b>Freeman House</b>	NR-Eligible	Criterion C
<b>William Worley House</b>	NR-Eligible	Criterion C
<b>Buncombe Bridge 323 (Great Smoky Mountains Park Bridge)</b>	NR-Eligible	Criterion C
<b>Southern Railroad Bridge</b>	NR-Eligible	Criteria A & C
<b>Montford Area Historic District</b>	NR-Listed Local Landmark	Criteria A & C
<b>Montford Hills</b>	NR-Eligible	Criteria A & C
<b>Montford Hills &amp; Hibriten Drive Boundary Expansion</b>	NR-Eligible	Criteria A & C
<b>Mrs. Minnie Alexander Cottage</b>	NR-Listed	Criterion C
<b>Whiteford G. Smith House</b>	NR-Eligible	Criterion C
<b>Haywood Street United Methodist Church</b>	NR-Eligible	Criterion C

### Archaeological Sites Recommended NRHP-Eligible

Site 31BN623, the Lower Hominy Hydroelectric Power Plant site, is recommended NRHP-eligible under Criterion A due to its association with the early hydroelectric and streetcar industries. It was likely in operation from 1902 until 1916 and was one of the earlier hydroelectric facilities in western North Carolina. The site contains several above-ground structural features, including remains of the dam and presumed powerhouse. However, site 31BN623 does not appear to retain intact archaeological research potential. On June 30, 2015, a meeting was held with HPO and FHWA staff to discuss effect to the site. Fill associated with the project will cover a small portion of one wall feature associated with the hydroelectric facility. NC DOT plans to drive iron markers on each end of the fill adjacent to the wall to mark its extent prior to the placement of fill at this location. Based upon review of the current project design plans, the I-2513 project was determined to have “No Adverse Effect” upon site 31BN623 and concurrence was reached during the June 30 effects meeting.

Site 31BN826 consist of an upland lithic scatter overlooking Ragsdale Creek (formerly Lake Ashnoca). It appears to date primarily to the Late Archaic period (although no diagnostic artifacts were found). The eastern portion of the site falls within the newly proposed right-of-way. Artifact density is high and may represent multiple and intensive occupations. The survey investigations indicate that significant artifact deposits are intact below the plow zone, suggesting that hearths and other features may be present as well. Analysis of horizontal artifact distributions should allow separation of components and, perhaps, individual activity areas. The site could offer important information regarding Archaic period activities in upland settings. At the regional scale, data from these sites could provide a valuable complement to available data from lowland riverine sites, such as the Ravensford site, and sites in cove settings, such as the Cold Canyon site in Swain County (Shumate and Kimball 2016, Webb et al. 2005). At a larger scale, data on the organization of settlements and activities could be profitably compared with data from contemporaneous sites in the sandhills and elsewhere, leading to an increased understanding of the nature of hunter-gatherer settlement organization in the Southeast (e.g McNutt 2006). For these reasons, 31BN826 is recommended as NRHP-eligible under Criterion D.

### Archaeological Sites Requiring Additional Work to Establish Eligibility

Sites 31BN823 and 31BN870 are situated on the French Broad River floodplain at locations that contain substantial historic alluvium. Site 31BN823 yielded Woodland period artifacts, but work was constrained by the presence of a RV park with associated fill, gravel areas, and buried utilities. Site 31BN870 consists of unidentified prehistoric components as well as recent historic refuse. A geomorphic reconnaissance along with a floodplain setting suggests the potential for deeply buried deposits. Mechanized deep trench testing would be needed at these sites to identify and assess possible buried archaeological resources.

Site 31BN868 is composed of an unknown prehistoric component and broken bottle glass fragments derived from the early to mid-20<sup>th</sup> century Biltmore Creamery. Like the previous two sites, 31BN868 is situated on the French Broad floodplain and covered by alluvium. This alluvium may be protecting cultural deposits. This site is also within a National Historic Landmark boundary and buried deposits associated with Creamery if present could represent a contributing resource. Mechanized stripping followed by deep trench testing is recommended to search for and assess likely features for NRHP eligibility.

Sites 31BN873 is prehistoric sites that probable represent multiple Late Archaic to Middle Woodland components. Results of the survey suggest that intact pit features may be present. Mechanized stripping is recommended to identify and evaluate likely features and to establish a definitive characterization of the NRHP eligibility.

## 10. Describe the undertaking's effects on historic properties:

### Historic Architecture

Prior to completion of the 2015 DEIS, the potential effects of the preferred alternative on historic architectural resources were assessed in accordance with Section 106 of the NHPA. The NC HPO, NCDOT and FHWA concurred with the effects determinations at a meeting held on May 24, 2015. Additional design changes were made after 2015 in order to reduce impacts to historic properties and required additional meetings with NC HPO, NCDOT and FHWA. A supplemental effects form was signed November 27, 2018 that updated the effects calls for several historic properties in the APE after the DEIS published and the preferred alternative identified. The current effects determinations are summarized in the table below.

Resource Name	Preferred Alternative and Effect	Reasons/ Conditions
<b>Biltmore Estate</b>	Section C: Alt. F-1 No adverse effect	No construction work or temporary construction easements outside the existing ROW and no retaining walls.
<b>Asheville School</b>	Section C: Alt. F-1 No adverse effect with environmental commitments <i>De minimis</i> under Section 4(f)	The DEIS reported 2.79 acres of right-of-way impacts and 0.58 acre of construction easement impacts. Revised designs reduced the amount of right-of-way impacts to 0.51 acre. The amount of construction easement required for this property increased from 0.58 acre to 1.48 acres for the reconstruction of small section of soil path/driveway near corner of I-40 and Sand Hill Road.
<b>Buncombe Bridge 216</b>	Section A No adverse effect	No construction work or temporary construction easements will impact the structure despite its location under the new facility. Bridge will remain in place and closed to motorized vehicles.
<b>Calvary Baptist Church</b>	Section A No effect	No construction work within property boundary. Church parking and access are unaffected.
<b>Baker Building (formerly Friendly Grocery Store)</b>	Section A No adverse effect	Small easement to modify the sidewalks in front of building required to accommodate the revised grade of Haywood Road. On-street parking spaces in front of structure (Haywood Road) will be eliminated, but access to parking behind building remains unchanged.
<b>West Asheville/Aycock School Historic District</b>	Section A No adverse effect with environmental	The DEIS reported 0.35 acre of right-of-way impacts and 0.25 acre of construction easement impacts to the school. Revised designs reduced the amount of impacts to 0.15 acre and 0.10 acre,

	<p>commitments</p> <p><i>De minimis</i> under Section 4(f)</p>	<p>respectively. However, after speaking with school administration, redesign of the school's traffic pattern and purchase of a vacant lot on Argyle Lane could recoup the parking spaces impacted and alleviate the access issues. Construction easements would increase with this scenario but NCDOT investigating the constructability and design details for the new parking lot in consultation with the school and HPO.</p> <p>Commitments:</p> <ul style="list-style-type: none"> <li>• Recoup the school's loss of 25 parking spaces with a new parking lot</li> <li>• Screening trees preserved along west side of classrooms.</li> <li>• Fencing (a minimum of 6 feet in height and of the school's chosen materials) installed between the Greenway and school yard.</li> <li>• Along Haywood Road, the trees and Arrowhead monument on school grounds protected during construction.</li> </ul>
<b>Freeman House</b>	<p>Section B, Alt 4B</p> <p>No adverse effect with environmental commitments</p>	<p>After publication of the DEIS, NCDOT contacted the property owner to explain proposed audible and visual impacts resulting from the project and potential abatement measures. The property owner indicated that they would like NCDOT to provide funding for appropriate abatement measures.</p> <p>Commitments:</p> <ul style="list-style-type: none"> <li>• NCDOT will reimburse the property owner for the costs to install central heat/AC, storm windows, and insulation based on the lowest of 3 bids provided to NCDOT by the property owner. If the property owner chooses, NCDOT will make payment directly to a third-party contractor(s) upon satisfactory completion of the work.</li> </ul> <p>Install landscaping along the edges of their property facing the new facility.</p>
<b>William Worley House</b>	<p>Section B, Alt 4B</p> <p>No adverse effect with environmental commitments</p> <p><i>De minimis</i> under Section 4(f)</p>	<p>Revised designs reduced the amount of right-of-way impacts to 0.05 acre and increased the amount of permanent underground easement slightly to 0.26 acre to construct the retaining wall. After publication of the DEIS, NCDOT contacted the property owner to explain proposed audible impacts resulting from the project and potential abatement measures. The property owner indicated that they would like NCDOT to provide funding for appropriate abatement measures.</p> <p>Commitments:</p>



		<ul style="list-style-type: none"> <li>NCDOT will reimburse the property owner for the costs to install central heat/AC, storm windows, and insulation based on the lowest of 3 bids provided to NCDOT by the property owner. If the property owner chooses, NCDOT will make payment directly to a third-party contractor(s) upon satisfactory completion of the work.</li> </ul>
<b>Buncombe Bridge 323 (Great Smoky Mountains Park Bridge)</b>	Section B, Alt 4B No effect	No construction work or temporary construction easements will impact the structure.
<b>Southern Railroad Bridge</b>	Section B, Alt 4B No effect	No construction work or temporary construction easements will impact the structure.
<b>Montford Area Historic District</b>	Section B, Alt 4B <b>Adverse Effect</b>	No construction work or temporary construction easements will impact the district, however two elevated bridges and a retaining wall over 600 feet in length will create visual impacts to Riverside Cemetery within the district. Revised designs do not require the underground easement and further reduce impacts to the district. NCDOT is working with the newly-formed Asheville Aesthetics Advisory Committee to design appropriate landscaping measures to minimize the visual effects of the elevated roadway adjacent to Riverside Cemetery.
<b>Montford Hills</b>	Section B, Alt 4B No adverse effect	Revised designs do not require the underground easement to accommodate the retaining wall; therefore, there are no temporary or permanent easements within the district's boundaries.
<b>Montford Hills &amp; Hibriten Drive Boundary Expansion</b>	Section B, Alt 4B No effect	No construction work or temporary construction easements will impact the district.
<b>Mrs. Minnie Alexander Cottage</b>	Section B, Alt 4B No effect	No construction work or temporary construction easements will impact the structure.
<b>Whiteford G. Smith House</b>	Section B, Alt 4B No effect	No construction work or temporary construction easements will impact the structure.
<b>Haywood Street</b>	Section B, Alt 4B	Originally, no construction work or temporary

<b>United Methodist Church</b>	No adverse effect	construction easements would impact the church or its parking. However, the construction of a sidewalk in front of the church is currently proposed and supported by the congregation.
	<i>De minimis</i> under Section 4(f)	

### Archaeology

Of the four NRHP eligible sites (31BN623, 31BN825, 31BN826, and 31BN828), sites 31BN825 and 31BN828 are being avoided. Although portion of 31BN828 are within existing right-of-way, construction activities will not affect this site. It is separated from the I-2513 project by Hominy Creek.

For site 31BN623, no ground disturbing activities will occur. That section of site within the right-of-way and easement will be covered in fill creating a “No Adverse Effect.” Concurrence was reached during a June 30, 2015, meeting with NC DOT, HPO, and FHWA staff.

Impacts to sites 31BN826 have been reduced. The majority of this site will remain intact on private property.

Of the seven other archaeological sites (31BN814, 31BN823, 31BN867, 31BN868, 31BN870, 31BN871, and 31BN873) that will require additional investigations to determine eligibility, all have had impacts reduced or avoided. Sites 31BN814 and 31BN867 will be avoided and are not included within right-of-way or easements for the preferred alternatives. A section of site 31BN871, however, is within existing right-of-way, but no construction activities will occur in this area. Impacts to site 31BN823, 31BN868, 31BN870, and 31BN873 will be minimal with most of the sites remaining intact.

## **11. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):**

### Historic Architecture

Montford Area Historic District -- No construction work or temporary construction easements will impact the district, however two elevated bridges and a retaining wall over 600 feet in length will create visual impacts to Riverside Cemetery within the district. (See page 9, Reasons/Conditions column)

### Archaeology

The eastern section of 31BN826 is within the newly proposed right-of-way and easement for I-2513 and could not be avoided due to its close proximity to the current roads. Ground disturbance from slope cutting, vehicle access, and other construction activities will adversely affect this site. These activities will impact intact cultural deposits and destroy any integrity the site might possess for future study.

Portions of sites 31BN823, 31BN868, 31BN870, 31BN873, and any newly identified sites within the 22 acres recommended for deep testing may also be adversely affected by construction if determined eligible for the NRHP during the next phase of testing. Small portions of each of these sites fall within the newly proposed right-of-way or easements and cannot be avoided. Planned construction activities may impact possible significant deposits at these sites.

## **12. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai’ian organizations, or the public, including any correspondence from the SHPO**

and/or THPO.

#### Historic Architecture

William Worley House -- After publication of the DEIS and selection of the preferred alternative, NCDOT met with the property owner of the William Worley House on September 19, 2016. The purpose of the meeting was to explain proposed impacts resulting from the project and potential noise abatement measures such as installation by NCDOT of insulation and central air and any other actions that would reduce noise. NCDOT will continue to coordinate with the property owner to determine the appropriate mitigation measures.

Freeman House -- After publication of the DEIS and selection of the preferred alternative, NCDOT contacted the property owner of the Freeman House. The purpose of the contact was to explain proposed impacts resulting from the project and potential noise abatement measures such as installation by NCDOT of insulation and central air and any other actions that would reduce noise. NCDOT will continue to coordinate with the property owner to determine the appropriate mitigation measures.

Montford Area Historic District – Several neighborhood meetings have been attended by NCDOT, FHWA, and local officials to discuss the impacts to this district and possible landscaping and aesthetic treatments to mitigate for the anticipated impacts caused by the large retaining wall and bridges. NCDOT will continue to coordinate with the neighborhood and city of Asheville to determine the appropriate mitigation measures.

### **III. Optional Information**

**13. Please indicate the status of any consultation that has occurred to date.** Are there any consulting parties involved other than the SHPO/THPO? Are there any outstanding or unresolved concerns or issues that the ACHP should know about in deciding whether to participate in consultation?

No one has formally requested to become a consulting party; however, there are several property owners or organizations that have been consulted for their views about the impacts of the project and potential mitigation. They are:

- Eastern Band of the Cherokee Indian
- Biltmore Estate
- Asheville/Buncombe County Historic Preservation Commission
- Montford Neighborhood Association
- Owners of the William Worley House
- Owners of the Freeman House
- Aesthetics Advisory Committee – established by the City of Asheville to work with NCDOT and the city throughout the planning and design of the project

**14. Does your agency have a website or website link where the interested public can find out about this project and/or provide comments?** Please provide relevant links:

<https://www.ncdot.gov/projects/asheville-i-26-connector/Pages/default.aspx>

**15. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard or other federal interagency project tracking system?** If so, please provide the link or reference number:

**The following are attached to this form** (check all that apply):

Section 106 consultation correspondence

Maps, photographs, drawings, and/or plans

Additional historic property information

Other: