

## MINIMUM CRITERIA DETERMINATION CHECKLIST

**TIP Project No.:** B-5895  
**W.B.S. Project No.:** 48088.1.1

**Project Location:** Bridge No. 67 on US 25/US 70 over the French Broad River in Madison County

**Project Description:** The proposed project involves replacing Bridge No. 67 on US 25/US 70 over the French Broad River in Madison County (Figure 1). The proposed project is included in the Structures Management Unit (SMU) Bridge Program. Right of way acquisition and construction are scheduled for state fiscal years 2022 and 2023, respectively.

The replacement structure will be a bridge proposed to be 560 feet long (Figure 2) and will be replaced on new location south of the existing bridge. The bridge will be 32 feet wide (clear roadway width) with two 12-foot lanes, 4-foot bicycle lanes, and 5-foot 6-inch sidewalks on each side to accommodate for bicycle and pedestrian traffic to the Appalachian Trail. The bridge length is based on preliminary design information and is set by hydraulic requirements. The roadway grade of the new structure will be close to the existing structure, but slightly higher due to overtopping. Construction will be staged with two-lane two-way traffic maintained on the existing bridge; the existing bridge will be removed once construction is complete. The design speed will be 40 mph using American Association of State Highway and Transportation Officials (AASHTO) guidelines.

Traffic will be detoured on-site using the existing bridge and roadway alignment during construction.

**Purpose and Need:** The purpose of this project is to replace a bridge considered functionally obsolete, according to the bridge's 2020 *Structure Safety Report*. Bridge No. 67 was built in 1951 and has a sufficiency rating of 31.79 out of 100. The bridge is 529 feet long with 26 feet clear roadway width. The superstructure of the bridge is continuous arched reinforced concrete deck girders. The substructure of the bridge consists of reinforced concrete.

Components of the concrete superstructure have experienced an increasing degree of deterioration that can no longer be addressed by maintenance activities. Bridge No. 67 has an Average Annual Daily Traffic (AADT) volume of 3,800 vehicles per day (vpd) for the year 2016 and future traffic of 5,600 AADT for the year 2040. Replacement of the bridge will improve traffic operations.

**Anticipated Permit or Consultation Requirements:** A Nationwide or Regional General Permit and a Section 10 Permit from the United States Army Corps of Engineers (USACE), along with a corresponding 401 Certification is anticipated for this project.

**Special Project Information:**

**Environmental Commitments:** Green Sheet Commitments are located at the end of the checklist.

**Alternatives Discussion:** In addition to the proposed project, three alternatives were explored during the planning stage of the project.

The No Build Alternative would require the closing of US 25/US 70 in this location, which is unacceptable given the volume of traffic on this road.

The Rehabilitation Alternative, due to the age and extensive deterioration of the existing bridge, would require replacing the concrete and steel components – resulting in effectively replacing the bridge.

Offsite Detours were reviewed and considered unacceptable due to excessive detour lengths, causing significant delays for EMS providers and school buses. Furthermore, construction of an off-site detour would require a barrier at the French Broad River, which would impact pedestrians (hikers) on the Appalachian Trail. As such, Offsite Detour alternatives were considered not feasible.

**Estimated Costs:** The estimated costs are as follows:

Right of Way:	\$790,000 (as of July 2015)
Construction:	\$9,400,000 (As of January 2022)

**Agency Comments:** As part of project scoping, comments were requested from state, federal, and local agencies. Comments received are summarized below:

Cultural Resources: The Environmental Analysis Unit on behalf of the Human Environment Group performed historic surveys which determined that Bridge No. 67 and the Appalachian Trail (NC007) are eligible for the National Register of Historic Places. It was determined that removal of the existing bridge will have an Adverse Effect to Bridge No. 67 as well as the Appalachian Trail. The Memorandum of Agreement (MOA) for historic architecture was signed on October 13, 2020 by NCDOT, the State Historic Preservation Office, and the USACE Wilmington District. No archaeological survey is required.

At the request of USACE, an archaeological survey was conducted, including subsurface survey. No archaeological resources were identified, resulting in a finding of “No Historic Properties Affected” for archaeological resources.

The project cultural resources forms are included as Appendix D.

Tribal coordination with the Cherokee Nation, the Eastern Band of Cherokee Indians, the United Keetoowah Band of Cherokee Indians, the Catawba Indian Nation, and Muscogee (Creek) Nation was initiated on November 15, 2021. A response was received from the Catawba Indian Nation indicating the tribe had no immediate concerns but should be notified if Native American artifacts and/or human remains are located during the ground disturbance phase of the project. No other tribal responses were received.

Land of Sky RPO: The Land of Sky RPO noted on December 15, 2015 that the Blue Ridge Bike Plan recommends a bike lane along the bridge and that sidewalks along both sides of the bridge will be needed due to the bridge being within the municipal boundary of Hot Springs. The RPO also mentioned the new bridge is a gateway to the Town of Hot Springs. The proposed project accommodates these features.

NCDOT Bicycle and Pedestrian Division: In a letter dated February 1, 2016, NCDOT Bicycle and Pedestrian Division stated that US 25/US 70 is an important multi-modal connection with regional, state, and national significance. The Appalachian Trail utilizes Bridge No. 67 to cross the French Broad River. State Bicycle Route NC 2 (Mountains to Sea) runs on US 25/US 70 and crosses the bridge. In addition, a regional bicycle route, the Franklin Mountain Loop (Land of Sky RPO) also uses this facility. The Madison County Comprehensive Transportation Plan indicates that the sidewalk on the bridge needs improvement; the current sidewalk is substandard width. It is recommended that accommodations for both bicyclists and pedestrians are provided on the replacement bridge, considering the national, statewide, and regional importance of this multi-modal connection. The proposed project would include dedicated bicycle and pedestrian facilities.

**Complete Streets:** The Complete Streets Project Sheet for B-5895, outlining the inclusion of bicycle lanes and sidewalks, was approved on December 3, 2021.

**Protected Species:** The *Natural Resources Technical Memorandum* for the project, issued October 2016, noted two listed species in Madison County, the Gray bat and Northern Long-eared bat. An Information for Planning and Consultation (IPaC) report was run on November 5, 2021 for the project study area. The listed species in the project study areas remain the Gray bat and Northern Long-eared bat.

Gray bat: In a survey completed by NCDOT on May 16, 2019, neither habitat nor evidence of bats were observed.

Northern Long Eared Bat (NLEB): In a survey completed by NCDOT on May 16, 2019, neither habitat nor evidence of bats were observed.

NCDOT proposes that this project is consistent with the final Section 4(d) rule. The US Army Corps of Engineers will be responsible for final biological conclusions USFWS Concurrence, if required.

**GeoEnvironmental:** The Phase I GeoEnvironmental Report for the project, issued May 20, 2016, indicated two underground storage tanks (UST) that may contain petroleum are

present within the southwest quadrant of the project study area. These sites are identified in Figure 3 in Appendix B. Based on preliminary plans, ground disturbing activities may occur on the parcels that contain the USTs.

### Public Involvement:

Landowner notification letters were sent out February 16, 2016 to all property owners potentially affected by this project. To date, no comments have been received.

## **PART A: MINIMUM CRITERIA**

- |  | <b>YES</b>                          | <b>NO</b>                |
|--|-------------------------------------|--------------------------|
| 1. Is the proposed project listed as a type and class of activity allowed under the Minimum Criteria Rule in which environmental documentation is <u>not</u> required? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

If the answer to number 1 is “no”, then the project does not qualify as a minimum criteria project. A state environmental assessment is required.

If yes, under which category? 9 (Reconstruction of existing crossroad or railroad separations and existing stream crossings, including, but not limited to, pipes, culverts, and bridges)

*If either category #8, #12(i) or #15 is used complete Part D of this checklist.*

## **PART B: MINIMUM CRITERIA EXCEPTIONS**

- |  | <b>YES</b>               | <b>NO</b>                           |
|--|--------------------------|-------------------------------------|
| 2. Could the proposed activity cause significant changes in land use concentrations that would be expected to create adverse air quality impacts?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Will the proposed activity have secondary impacts or cumulative impacts that may result in a significant adverse impact to human health or the environment?   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Is the proposed activity of such an unusual nature or does the proposed activity have such widespread implications, that an uncommon concern for its environmental effects has been expressed to the Department?  | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 5. Does the proposed activity have a significant adverse effect on wetlands; surface waters such as rivers, streams, and estuaries; parklands; prime or unique agricultural lands; or areas of recognized scenic, recreational, archaeological, or historical value? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 6. Will the proposed activity endanger the existence of a species on the   | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



Department of Interior's threatened and endangered species list?

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
| 7. Could the proposed activity cause significant changes in land use concentrations that would be expected to create adverse water quality or ground water impacts?     | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|   | <b>YES</b>               | <b>NO</b>                           |
| 8. Is the proposed activity expected to have a significant adverse effect on long-term recreational benefits or shellfish, finfish, wildlife, or their natural habitats | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

### **PART C: COMPLIANCE WITH STATE AND FEDERAL REGULATIONS**

- |  |                                     |                                     |
|--|-------------------------------------|-------------------------------------|
|  | <b>YES</b>                          | <b>NO</b>                           |
| 9. Is a federally protected threatened or endangered species, or its habitat, likely to be impacted by the proposed action?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 10. Does the action require the placement of temporary or permanent fill in waters of the United States?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 11. Does the project require the placement of a significant amount of fill in high quality or relatively rare wetland ecosystems, such as mountain bogs or pine savannahs? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 12. Is the proposed action located in an Area of Environmental Concern, as defined in the coastal Area Management Act?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| 13. Does the project require stream relocation or channel changes?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

#### **Cultural Resources**

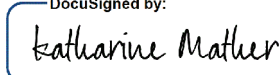
- |   |                                     |                                     |
|---|-------------------------------------|-------------------------------------|
| 14. Will the project have an "effect" on a property or site listed on the National Register of Historic Places?                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| 15. Will the proposed action require acquisition of additional right of way from publicly owned parkland or recreational areas? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

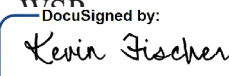
**Response to Question 10:** Temporary construction, such as stream dewatering, work bridges, or temporary causeways, are often used during bridge construction and rehabilitation and may be needed during construction of the project. Potential fill would be associated with a temporary causeway to get equipment to an interior bent which is in the water. The US Army Corps of Engineers hold the final discretion as to what permit will be required.

**Response to Question 14:** Bridge No. 67 and the Appalachian Trail are eligible for the National Register of Historic Places. The removal of the bridge and the impacts to the Appalachian Trail would have an Adverse Effect. A Memorandum of Agreement (MOA) for historic architecture was signed on October 13, 2020 by NCDOT, the State Historic Preservation Office, and the USACE Wilmington District listing mitigation measures. These measures are listed as project commitments in the attached Green Sheet.

**PART D:( To be completed when either category #8, 12(i) or #15 of the rules are used.)*****Items 16- 22 to be completed by Division Environmental Officer.***

- |  |            |
|--|------------|
| 16. Project length:                                | <u>N/A</u> |
| 17. Right of Way width:                            | <u>N/A</u> |
| 18. Project completion date:                       | <u>N/A</u> |
| 19. Total acres of newly disturbed ground surface: | <u>N/A</u> |
| 20. Total acres of wetland impacts:                | <u>N/A</u> |
| 21. Total linear feet of stream impacts:           | <u>N/A</u> |
| 22. Project purpose:                               | <u>N/A</u> |

Reviewed by:  B18EE2AE3E344D2... Date: 1/18/2022  
 Katharine Mather, AICP

 ED19A18D98EC496... Date: 1/19/2022  
 Kevin Fischer, PE  
 NCDOT SMU

**List of Appendices:**

- A. Project Green Sheet
- B. Figures
- C. Preliminary Plan Sheets
- D. Cultural Resource Forms (including MOA and tribal responses)

**Madison County**  
**Replace Bridge No. 67 on US 25/US 70 over French Broad River**  
**Federal Project No. N/A**  
**WBS No. 48088.1.1**  
**TIP No. B-5895**

**Hydraulics Unit, Division 13 Construction- FEMA**

The Hydraulics Unit will coordinate with the NC Floodplain Mapping Program to determine the status of the project with regard to applicability of NCDOT's Memorandum of Agreement, or approval of a Conditional Letter of Map Revision (CLOMR) and subsequent final Letter of Map Revision (LOMR).

This project involves construction activities on or adjacent to a FEMA-regulated stream. Therefore, the Division shall submit sealed as-built construction plans to the Hydraulics Unit upon project completion certifying the drainage structure(s) and roadway embankment located within the 100-year floodplain were built as shown on the construction plans, both horizontally and vertically.

**NCDOT Environment Analysis Unit - Historic Architecture, Division 13, Structures Management Unit.**

Bridge No. 67 on US 25/ US 70 over the French Broad River and the Appalachian Trail are determined eligible for the National Register of Historic Places. It was determined that the existing bridge will be removed after the new bridge is built and removing the structure will have an Adverse Effect to Bridge No. 67 as well as the Appalachian Trail. The Memorandum of Agreement was signed on October 13, 2020 listing mitigation measures for design and maintenance of operations during construction (included in the appendix). These mitigation efforts should be adhered to during final design and construction. These measures include, but are not limited to:

- Prior to the initiation of construction, NCDOT will record the existing condition of Bridge Number 67 and its surroundings in accordance with the attached Historic Structures and Landscape Recordation Plan. Copies of the documentation will be deposited in the files of the State Historic Preservation Office (SHPO), and the NCDOT Historic Architecture Section.
- The replacement bridge will mimic the original historic bridge details and will utilize a Texas Classic Bridge Rail. The bridge design will be provided to the SHPO and concurring parties for comment prior to finalization of the plan.
- Concrete steps with handrail will be provided at the east end of the new bridge approach to provide continued access to the Appalachian Trail. The design of the steps will be reviewed by the SHPO and concurring parties prior to construction. The steps will be maintained by NCDOT Division 13
- During the construction project, the contractor shall maintain a safe pedestrian route and environment for Appalachian Trail hikers, including wayfaring signs warning of construction ahead, a clearly marked route for hikers through or

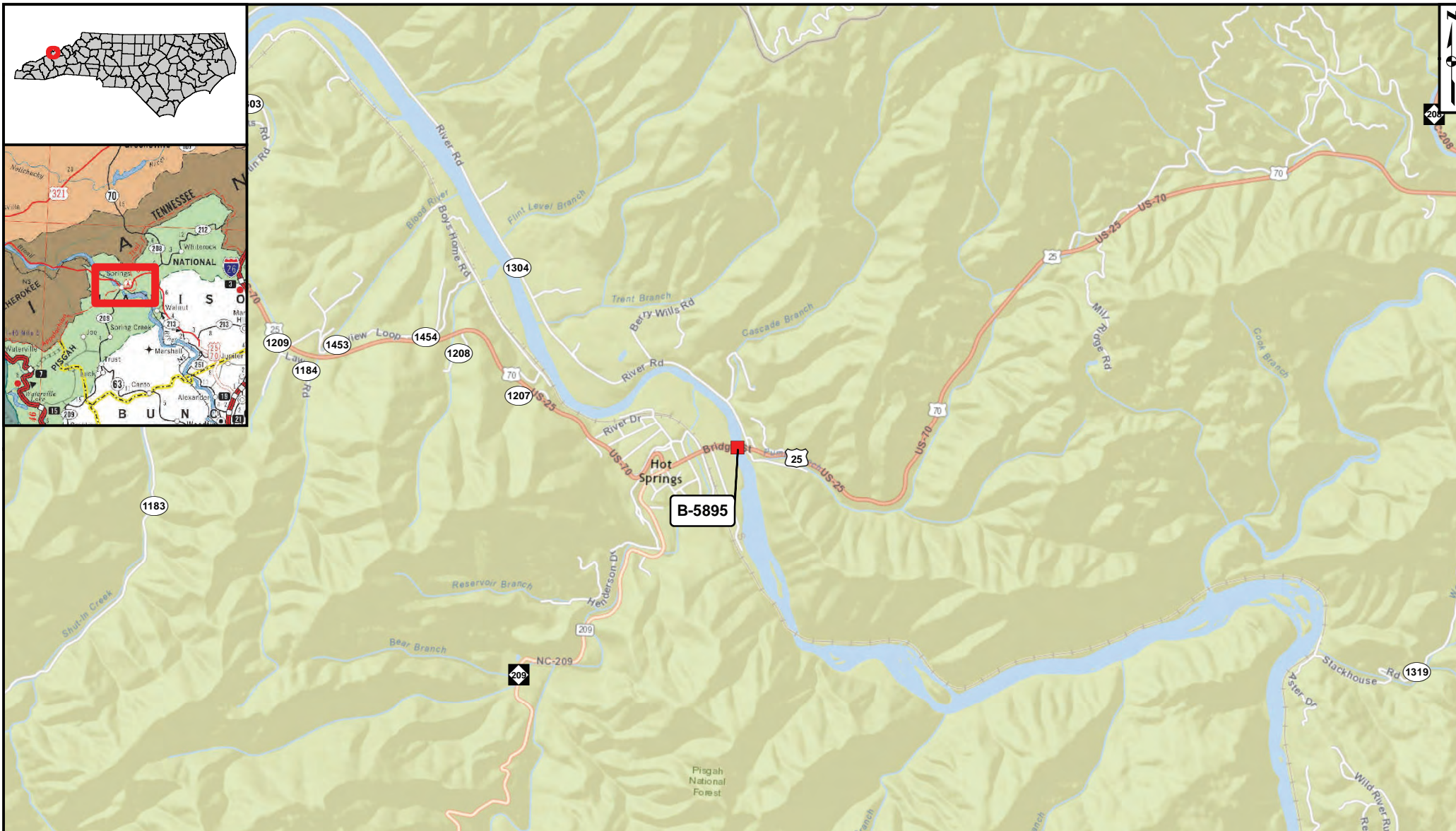
around the construction site, and when appropriate, flaggers to aid hikers in the construction zone. At the discretion of the contractor, and under the supervision of the NCDOT, flaggers will assure hikers do not pass through the construction site when there is potential danger. The construction contractor shall endeavor to minimize stoppage of hikers and regulate construction for hikers while ensuring safe passage.

- The NCDOT Resident Engineer shall conduct a pre-construction field meeting with representatives from the National Parks Service (NPS), Appalachian Trail Conservancy (ATC) and the contractor to discuss plans for hiker passage for the duration of the project and provide monthly status report of upcoming construction activities around the Appalachian Trail to the NPS Trail Superintendent and the Regional Director at the ATC in order to provide the NPS and ATC with information to disseminate to hikers including adequate warning about delays or possible reroutes. These monthly status reports will cease when the project is complete.
- A marked street crossing near the railroad tracks in Hot Springs will be retained for users to cross the street in a safe manner. NCDOT will design and erect signage and/or an informational kiosk at the crossing in consultation with the SHPO and the concurring parties within one year of completion of the new bridge.
- Markers for the Appalachian Trail, similar to what exists within Hot Springs, will be continued on the new bridge and concrete staircase to mark the trail

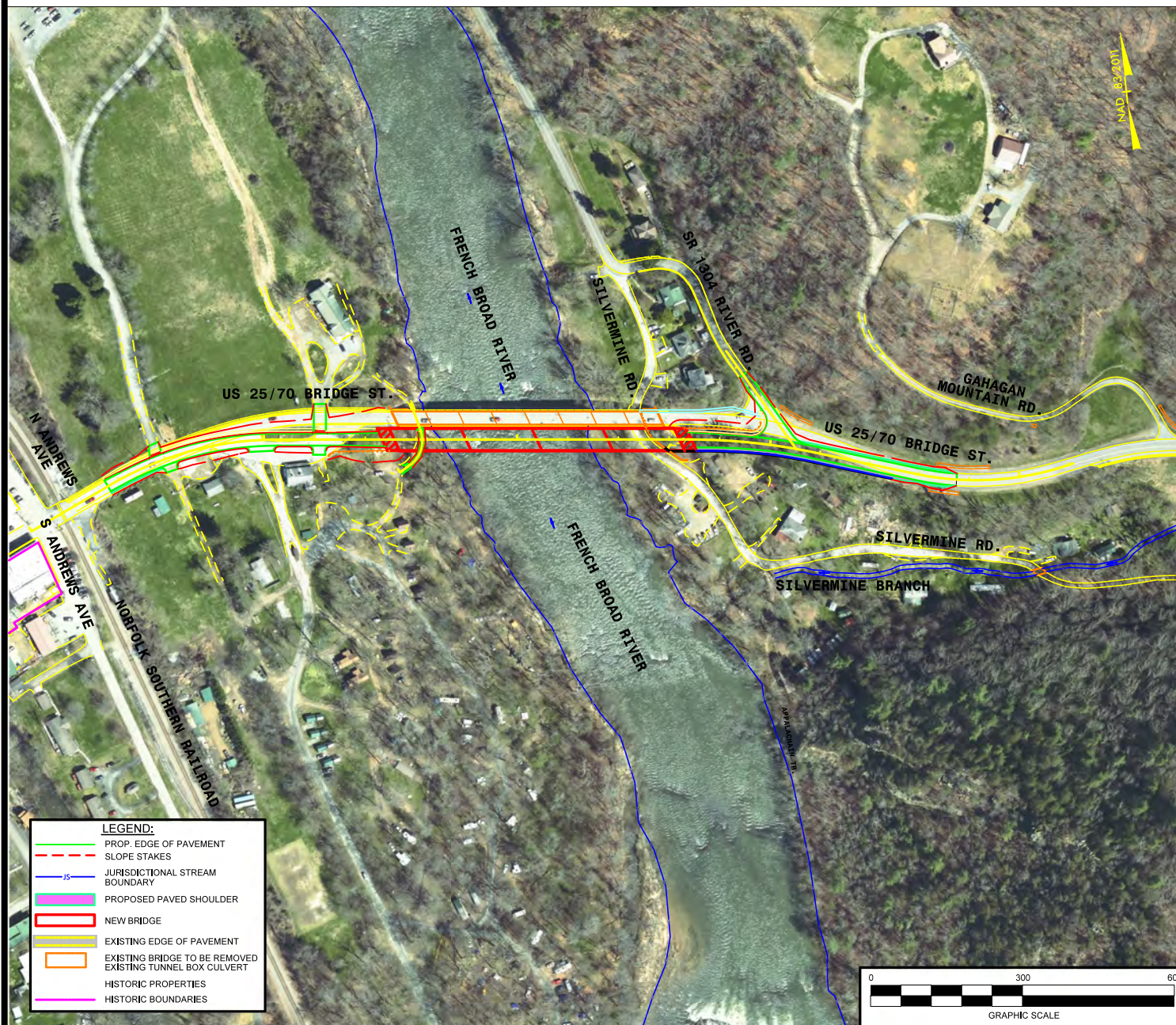
**NCDOT GeoEnvironmental Unit**

A workplan will be developed based on the final design to address any contaminated material that may be encountered at hazardous materials sites. Testing will occur prior to right of way acquisition such that cleanup costs due to hazardous materials may be considered at the time of right of way acquisition.









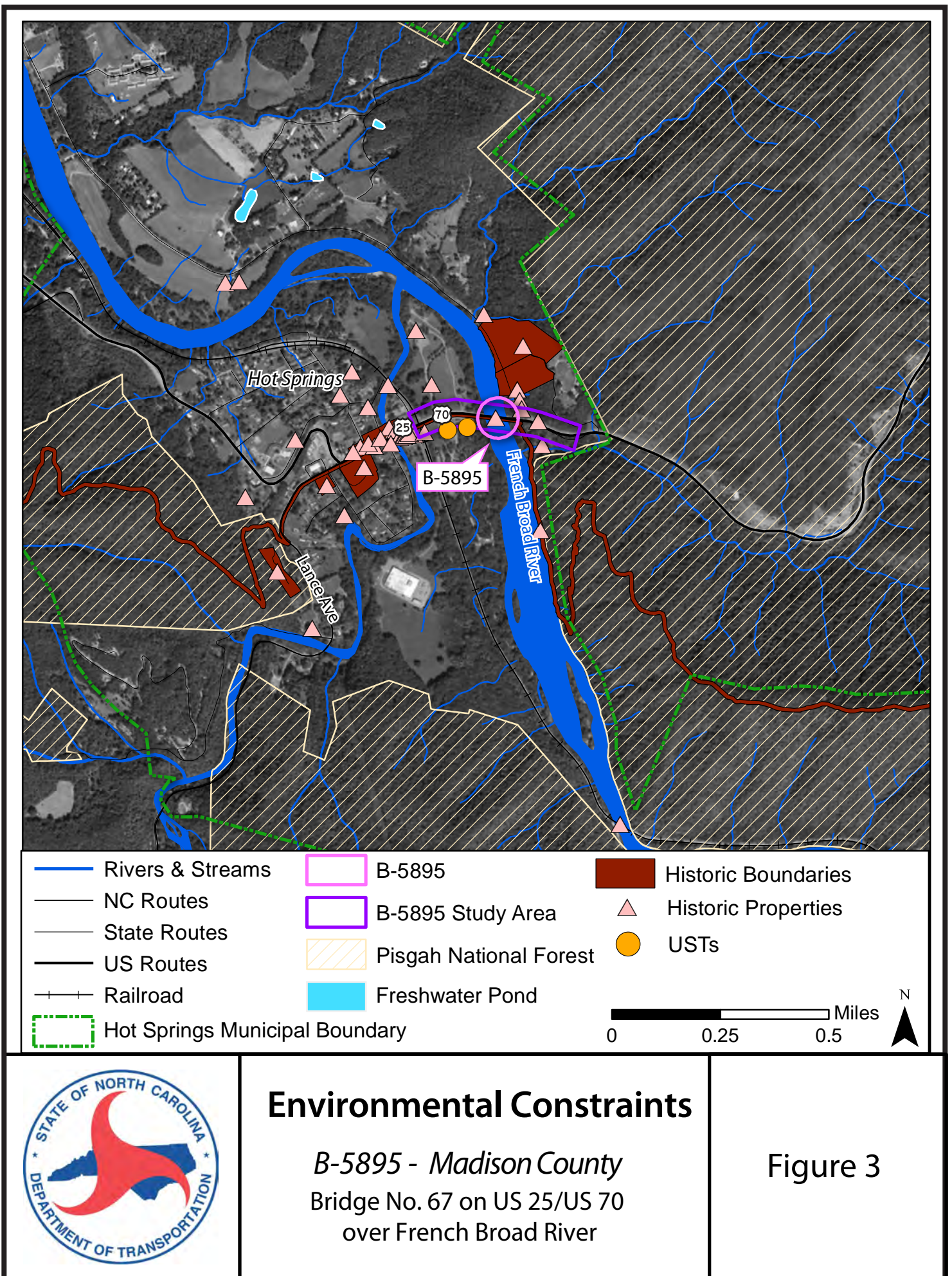
## Proposed Improvements

*B-5895 - Madison County*

Bridge No. 67 on US 25/US 70 over  
French Broad River  
New Alignment to the South  
Staged Construction

Figure 2









Bridge No. 67 Looking North



Bridge No. 67 Looking South



## Photos

*B-5895 - Madison County*  
 Bridge No. 67 on US 25/US 70  
 over French Broad River

Figure 4a





Stairs to Appalachian Trail in Northeast Quadrant of Bridge No. 67



East Face of Bridge No. 67

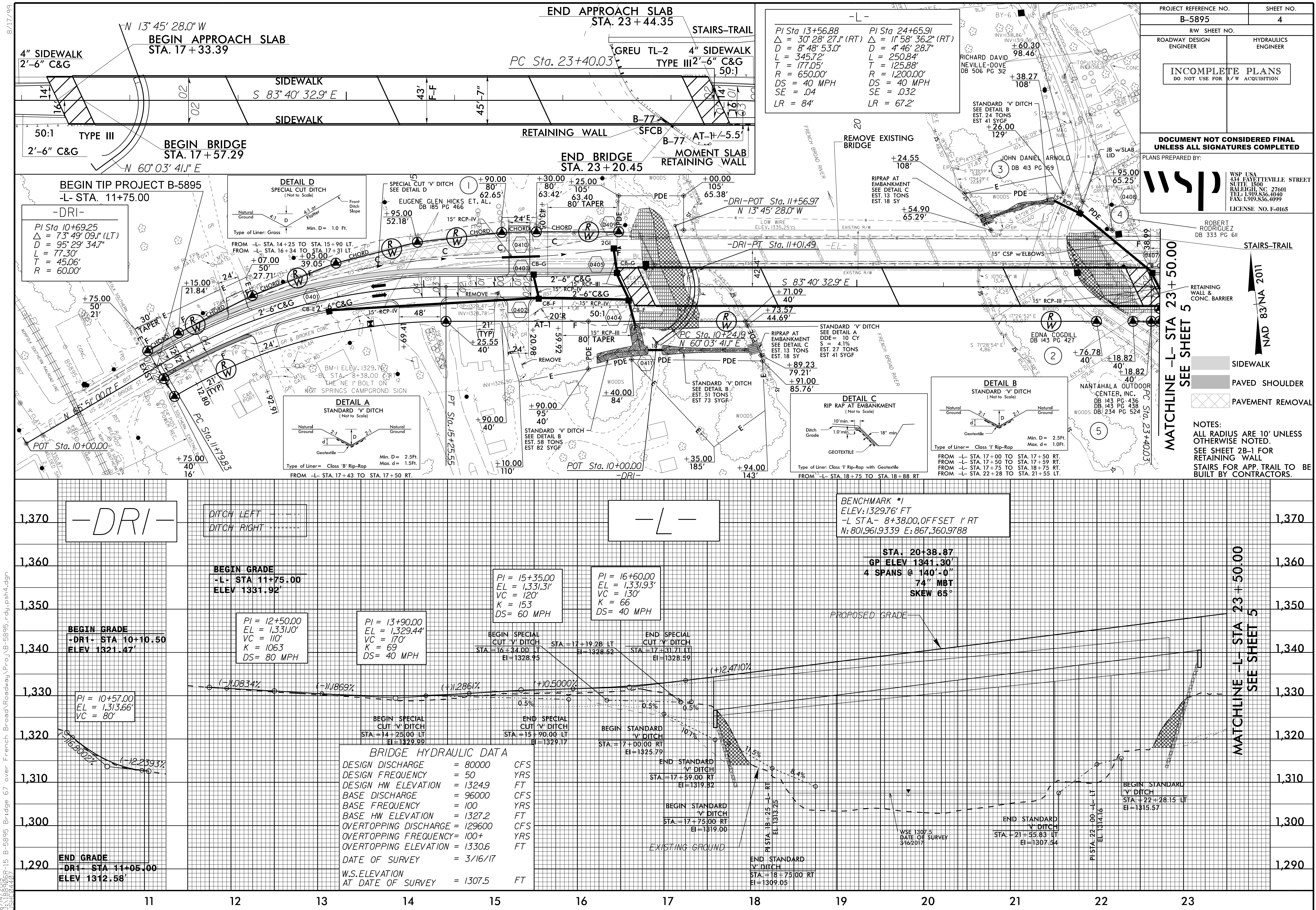


## Photos

*B-5895 - Madison County*  
 Bridge No. 67 on US 25/US 70  
 over French Broad River

Figure 4b







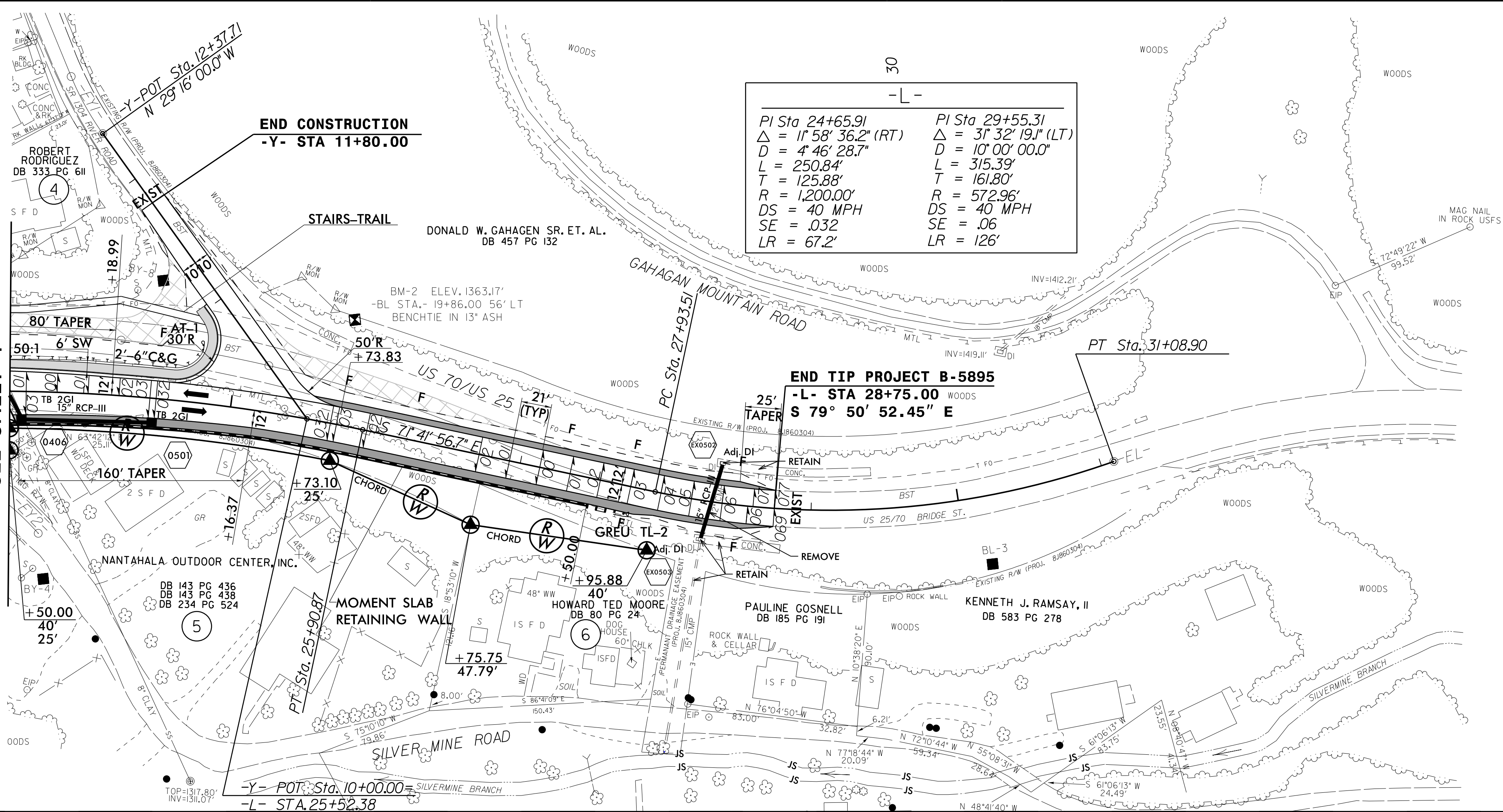
8/17/99

5/1/2018 1:54:04 PM  
S:\18895\B-5895 Bridge 67 over French Branch\Roadway\Proj\B-5895\_rdu.psh5.dgn

REVISIONS

MATCHLINE -L- STA 23+50.00  
SEE SHEET 4

MATCHLINE -L- STA 23+50.00  
SEE SHEET 4

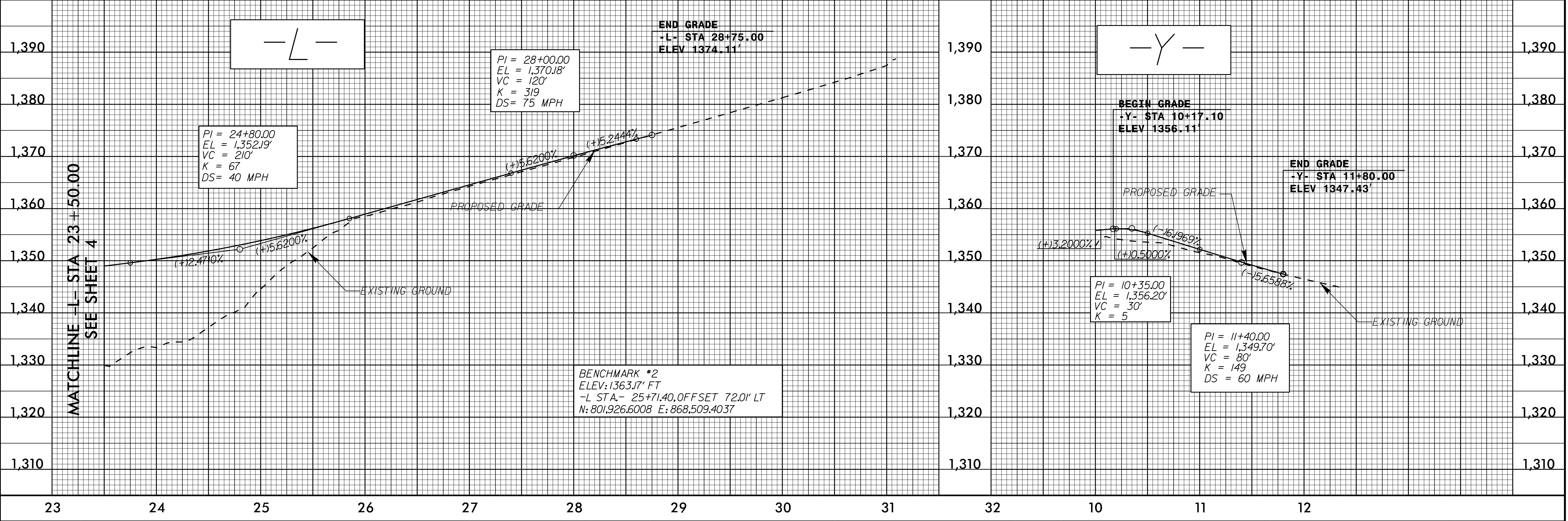


-L-	
PI Sta 24+65.91	PI Sta 29+55.31
$\Delta = 11^{\circ} 58' 36.2''$ (RT)	$\Delta = 31^{\circ} 32' 19.1''$ (LT)
D = 4' 46" 28.7"	D = 10' 00" 00.0"
L = 250.84'	L = 315.39'
T = 125.88'	T = 161.80'
R = 1,200.00'	R = 572.96'
DS = 40 MPH	DS = 40 MPH
SE = .032	SE = .06
LR = 67.2'	LR = 126'

NAD 83/NA 2011

- SIDWALK
- PAVED SHOULDER
- PAVEMENT REMOVAL

NOTES:  
ALL RADIUS ARE 10' UNLESS OTHERWISE NOTED.  
STAIRS FOR THE APP. TRAIL TO BE BUILT  
BY CONTRACTORS.



PROJECT REFERENCE NO.		SHEET NO.
B-5895		5
RW SHEET NO.		
ROADWAY DESIGN ENGINEER	HYDRAULICS ENGINEER	
INCOMPLETE PLANS DO NOT USE FOR R/W ACQUISITION		
DOCUMENT NOT CONSIDERED FINAL UNLESS ALL SIGNATURES COMPLETED		
PLANS PREPARED BY:		
WSP USA 434 FAYETTEVILLE STREET SUITE 1500 RALEIGH, NC 27601 TEL: 1919.836.4040 FAX: 1919.836.4099 LICENSE NO. F-0165		



16-01-0097

**HISTORIC ARCHITECTURE AND LANDSCAPES****\*\*SURVEY REQUIRED FORM\*\***

This form only pertains to Historic Architecture and Landscapes for this project. It is not valid for Archaeological Resources. You must consult separately with the Archaeology Group.

**PROJECT INFORMATION**

<b>Project No:</b>	B-5895	<b>County:</b>	Madison
<b>WBS No.:</b>	48088.1.1	<b>Document Type:</b>	CE
<b>Fed. Aid No:</b>	N/A	<b>Funding:</b>	<input checked="" type="checkbox"/> State <input type="checkbox"/> Federal
<b>Federal Permit(s):</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Permit Type(s):</b>	NWP
<b><u>Project Description:</u></b> Replace Bridge No. 67 on US 25/70 over French Broad River and Private Drive.			

**SUMMARY OF HISTORIC ARCHITECTURE AND LANDSCAPES REVIEW****Description of review activities, results, and conclusions:**

Review of HPO quad maps, HPO GIS information, historic designations roster, and indexes was undertaken on January 25, 2016. Bridge No. 67 is DETERMINED ELIGIBLE for National Register listing, and the APE contains several survey sites and borders the National Register Hot Springs Historic District. A survey and determination of Effects will be required.

**SUPPORT DOCUMENTATION**

☒ Map(s) ☐ Previous Survey Info. ☐ Photos ☐ Correspondence ☐ Design Plans

**FINDING BY NCDOT ARCHITECTURAL HISTORIAN**

Historic Architecture and Landscapes -- **\*\*SURVEY REQUIRED\*\***

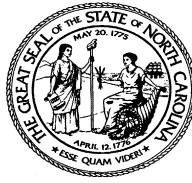
*Kate Hubbard*

NCDOT Architectural Historian

*1/25/2016*

Date

**Anticipated Fieldwork Completion Date:** September 2016



**North Carolina Department of Natural and Cultural Resources**  
**State Historic Preservation Office**

Ramona M. Bartos, Administrator

Governor Pat McCrory  
Secretary Susan Kluttz

Office of Archives and History  
Deputy Secretary Kevin Cherry

December 30, 2016

**MEMORANDUM**

**TO:** Kate Husband  
Office of Human Environment  
NCDOT Division of Highways

**FROM:** Renee Gledhill-Earley *Renee Gledhill-Earley*  
Environmental Review Coordinator

**SUBJECT:** Historic Structures Survey Report for Replacement of Bridge 67 on US 25/70 over  
French Broad River, B-5895, Madison County, ER 16-2118

Thank you for your November 14, 2016, memorandum transmitting the above-referenced report. We have reviewed the report and concur with its findings that the following properties are still eligible for listing in the National Register of Historic Places.

- Bridge 67 on US 25/70 over the French Board River
- French Board River Gauge Station (MD0255)
- Appalachian Trail (NC0007)

The following properties are not eligible for listing in the National Register.

- Paint Rock Historic Marker
- J. H. Sackett House (MD0297)
- John C. Sanders House (MD0178)
- Penland-Gentry House (MD0298)
- Silvermine Road Historic District (MD0299)

The William Ellerson House (MD0296) is eligible for listing in the National Register under Criterion C with boundaries shown as the 7.95 acres Parcel 8860829159.

The Jeff Bruce House (MD0074) is eligible for listing in the National Register under Criteria A and C with boundaries shown as the 5 acres Parcel 8860823349.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

cc: Mary Pope Furr, NCDOT, [mfurr@ncdot.gov](mailto:mfurr@ncdot.gov)





## NO ARCHAEOLOGICAL SURVEY REQUIRED FORM

This form only pertains to ARCHAEOLOGICAL RESOURCES for this project. It is not valid for Historic Architecture and Landscapes. You must consult separately with the Historic Architecture and Landscapes Group.



### PROJECT INFORMATION

Project No: **B-5895**

County: **Madison**

WBS No: **48088.1.1**

Document: **CE**

F.A. No:

Funding: ☒ State ☐ Federal

Federal Permit Required?

☒ Yes ☐ No Permit Type: **NWP**

**Project Description:** The replacement of Bridge No. 67 on US 25/70 over French Broad River in Madison County, North Carolina. The archaeological APE is centered upon the bridge structure and measures 1800ft in length and 300ft in width.

### SUMMARY OF CULTURAL RESOURCES REVIEW

#### **Brief description of review activities, results of review, and conclusions:**

Permitting and funding information was reviewed for determining the level of archaeological input required by state and federal laws. Based on the submitted "request for cultural resources review" form, the project is entirely state-funded with federal permit interaction. As such, Section 106 of the National Historic Preservation Act will apply and the United States Army Corp of Engineer will serve as the lead federal agency. Next, construction design and other data was examined (when applicable) to define the character and extent of potential impacts to the ground surfaces embracing the project locale. Once an APE was outlined, a map review and site file search was conducted at the Office of State Archaeology (OSA) on Monday, January 25, 2016. No previously documented archaeological sites are located in the APE limits or directly proximal.

An inspection of National Register of Historic Places (NRHP), State Study Listed (SL), Locally Designated (LD), Determined Eligible (DE), and Surveyed Site (SS) properties employing the NCSHPO website evidenced an absence of these historic resources within the immediate project area. In addition, historic maps of Madison County were appraised to further identify former structure locations, land use patterns, or other confirmation of historic occupation in the project vicinity. Archaeological/historical reference materials were inspected as well. In general, the cultural background review established that no NRHP listed properties, previously recorded archaeological sites, or cemeteries are located within the APE. Based on cultural-historical factors, the APE is considered to have a low potential for the documentation of archaeological resources.

Further, topographic, geologic, flood boundary, lidar and NRCS soil survey maps (Ud, Ue, BaA, UfB) were referenced to evaluate pedological, geomorphological, hydrological, and other environmental determinants that may have resulted in past occupation at this location. Aerial and on-ground photographs (NCDOT Spatial Data Viewer) and the Google Street View map application (when amenable) were also examined/utilized for additional assessment of disturbances, both natural and human induced, which compromise the integrity of archaeological sites.

16-01-0097

***Brief Explanation of why the available information provides a reliable basis for reasonably predicting that there are no unidentified historic properties in the APE:***

The APE and federal permit area are characterized by urban land complex soils or fill materials from earthy or mine spoil, cut and fill. The US 25/70 right-of-way through the project area is disturbed. NRHP eligible archaeological deposits are unlikely to be present or preserved in the presently defined APE. No further archaeological input or work will be necessary for this state-funded NCDOT project. A finding of "no archaeological survey required" is considered appropriate.

**SUPPORT DOCUMENTATION**

See attached: ☒ Map(s) ☒ Previous Survey Info ☐ Photos ☐ Correspondence  
☐ Photocopy of County Survey Notes Other:

**FINDING BY NCDOT ARCHAEOLOGIST****NO ARCHAEOLOGY SURVEY REQUIRED**

  
NCDOT

2/2/2016