

## Type III Categorical Exclusion Action Classification Form

STIP Project No.	<b>B-4442</b>
WBS Element	38368.1.2
Federal Project No.	N/A

### A. Project Description:

The North Carolina Department of Transportation (NCDOT) proposes to replace Bridges 100370 and 100373 on US 19/23/25/70 (Future I-26) over Reems Creek and Quarry Road in Buncombe County. Refer to Figure 1, Project Study Area.

Bridge Number 100370 and 100373 are each 270 feet long with a deck width of 33 feet 3 inches (28-foot clear roadway width). The structure is steel beams with cast-in-place concrete substructure on spread footings at interior bents and steel piles at end bents. The existing roadway is a four-lane, median-divided freeway with full control of access.

The NCDOT proposes to construct one 290-foot-long structure with a deck width of 125 feet 3 inches (120-foot clear roadway width). The structure proposed is prestressed concrete girders with cast-in-place concrete substructure on drilled shafts at interior bents and steel piles at end bents. NCDOT proposed to widen to include six lanes with a 26-foot median, 12-foot paved shoulders, and a design speed of 70 miles per hour (mph). The bridge is proposed to be replaced on-site by reducing lanes and shifting traffic from one bridge to the other during construction; therefore, a detour is not planned. Project B-4442 will replace the bridges with a wider bridge and widen a short segment of existing U.S. 19/23/25/70 to accommodate six lanes in the future, consistent with the proposed A-0010A improvements in this area. The widened portion of the roadway and bridge will continue to maintain two travel lanes in each direction until the proposed A-0010A improvements have been constructed.

### B. Description of Need and Purpose:

The purpose of the proposed project is to replace deficient bridges. Bridges 100370 and 100373 were constructed in 1962 and are considered structurally deficient with sufficiency ratings of 30.63 and 35.45 out of 100 points, respectively. Being structurally deficient does not mean that the bridges are unsafe but does mean the bridges need repair or replacement. As bridges age, the cost of repairs and continued maintenance eventually necessitates the need for replacement.

### C. Categorical Exclusion Action Classification:

**Type III**

### D. Proposed Improvements:

N/A

### E. Special Project Information:

These bridges were previously included as part of NCDOT State Transportation Improvement Program (STIP) project A-0010A, upgrade existing US 19/23 (Future I-26) from north of I-240 to Exit 13 – Forks of Ivy (SR 2148/Stockton Road) in Buncombe County. A-0010A was delayed in the latest STIP update and project development is currently on hold; however, due to the condition of Bridges 100370 and 100373, STIP project B-4442 is being advanced independent of A-0010A. A-0010A was being

developed through the NEPA/Section 404 Merger Process. Concurrence Points (CP) 1, 2, and 2A have been achieved, and applicable commitments made as part of that process will be applied to B-4442. NCDOT is proposing not to advance B-4442 through the Merger Process.

**Alternatives:** In addition to the No Build Alternative, one build alternative was considered.

**No Build Alternative:** No changes to the existing bridges and the need would not be addressed.

**Build Alternative:** Originally the typical section for the Build Alternative closely followed the typical section for A-0010A, which was the best-fit widening to six lanes with a 46-foot grassed median. At the June 17, 2021 NCDOT Monthly Coordination Meeting, the typical section was revised to six lanes with a 26-foot paved median to reduce the overall project footprint.

**Selected Alternative:** The Build Alternative has been selected because it best fulfills the purpose and need for the proposed project. The Selected Alternative minimizes environmental and property impacts by reducing the typical section and replacing the two existing bridges with one structure.

**Right-of-Way Impacts:** The Build Alternative would incorporate approximately 0.4 acre of permanent right-of-way impacts and 0.11 acre of temporary easements. Right-of-way impacts are anticipated in the northwest (0.32 acre) and southwest (0.08 acre) quadrants of the bridge. Temporary easement impacts are assumed in the southeast quadrant. There are no property takes anticipated for the Build Alternative.

**Estimated Costs:**

	Selected Alternative
Roadway Construction Cost <sup>1</sup>	\$26,500,000
Right-of-Way Cost <sup>2</sup>	\$190,000
Utility Relocation and Construction Cost <sup>1</sup>	\$234,000
<b>Alternative Total</b>	<b>\$27,000,000</b>

<sup>1</sup> Data is based on cost estimates completed in August 2021.

<sup>2</sup> Data is based on updated ROW cost estimates completed in October 2021.

**Estimated Traffic:**

Let Year (2023): 55,400 vpd  
Design Year (2043): 75,400 vpd

**Summary of Impacts:**

Impacts are calculated using the slope stakes plus a 25-foot buffer.

	Selected Alternative
Length (ft)	290
Streams (lf)	Intermittent: 81 Perennial: 469
Wetlands (ac)	<0.1
100-year, excluding floodway (ac)	0
Floodway (ac)	0
500-year (ac)	0
Terrestrial Communities (Montane Oak Hickory) (ac)	4.0
Terrestrial Communities (Rich Cove) (ac)	1.2
Terrestrial Communities (maintained disturbed) (ac)	13.2
Terrestrial Communities (Montane/Alluvial) (ac)	0.5
Parcels	4
Relocations	0

**Detour Route:** Replace-in-place construction. Traffic will be maintained on site during construction.

**Route Information:**

Route	Federal Functional Classification	Roadway Characteristics	
		Current – 2021	MTP Proposed – by 2040
US 19/23/25/70	Other Freeways & Expressways	4-lane divided	6-lane divided
Quarry Road	Local	2-lane undivided	2-lane undivided

**Public Involvement:** No public meetings were held. A postcard notifying nearby residents of the project was mailed on October 22, 2021. The mailing list included 93 properties within a 500-foot buffer surrounding the project study area.

**Other Agency Comments:** A start of study letter was sent to state and local agencies on July 16, 2021. The following comments were received:

**US Forest Service: Received 07/20/21**

The US Forest Service noted there are no impacts to land managed by the US Forest Service, therefore additional coordination with the agency is not needed.

*Response: Comment has been noted.*

**USFWS: Received 08/02/21**

USFWS comments noted surveys should be completed as suitable habitat is present for gray bat (*Myotis grisescens*) and Appalachian elktoe (*Alasmidonta raveneliana*). Additionally, the USFWS provided the following general recommendations:

- To avoid impacts to migratory birds, conduct a visual inspect of the structures to be demolished or maintained and other migratory bird nesting habitat within the work area during migratory bird nesting season of March through September.
- The use of clear-spanning bridge structures designed, at a minimum, to accommodate the active channel width.
- Deck drains should not discharge directly into streams.
- Armoring of the bank with riprap should be minimized.
- New structures should be constructed without the use of in-stream causeways or work pads whenever possible.
- All equipment should be refueled and receive maintenance outside of the riparian zone.
- Erosion and sedimentation control best management practices should be utilized.

*Response: Biological surveys for the gray bat and Appalachian elktoe have been completed. Species were not identified during surveys; however, habitat is present, therefore biological conclusions have been determined to be **May Affect Not Likely to Adversely Affect**.*

**USEPA: Received 08/13/21**

USEPA comments noted the presence of streams and riverine wetlands within the project study area. The following recommendations were included in their comments:

- Any contractor working on-site use best management practices and address any potential impacts to off-site streams and waterways.
- Site grading, excavation, and construction plans include implementable measures to prevent erosion and sediment runoff from the project site during and after construction.
- Include a stormwater prevention plan for the project in the future environmental impact analysis.

*Response: Comment has been noted.*

**‘Catawba Indian Nation: Received 09/10/21**

The Catawba Indian Nation noted no immediate concerns within the boundaries of the proposed project. They requested to be notified if Native American artifacts and/or human remains are located during ground disturbing activities.

*Response: Comment has been noted.*

**Muscogee (Creek) Nation: Received 09/14/21**

The Muscogee (Creek) Nation noted the project was previously included in studies for the A-0010A project and that the project is located within the Tribes historic area of interest. The response noted there should be no effects to any known historic properties, however, if any discoveries of cultural materials and/or human remains and/or funerary objects are found, they should be contacted. Additionally, if there are changes to the project they request to be contacted.

*Response: Comment has been noted.*

F. Project Impact Criteria Checklists:

<b>F3. Type III Actions</b>			
Proposed improvement(s) that fit Type III Actions (NCDOT-FHWA CE Programmatic Agreement, Appendix C) answer questions below.			
<ul style="list-style-type: none"> <li>• <i>NCDOT will certify the Categorical Exclusion for FHWA approval.</i></li> <li>• <i>If any questions are marked "Yes" then additional information will be required for those questions in Section G.</i></li> </ul>			
		Yes	No
1	Does the project involve potential effects to Threatened or Endangered species listed by the US Fish and Wildlife Service (USFWS) or National Marine Fisheries Service (NMFS)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2	Does the project result in impacts subject to the conditions of the Bald and Golden Eagle Protection Act (BGEPA)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	Does the project generate substantial controversy or public opposition, for any reason, following appropriate public involvement?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4	Does the project cause disproportionately high and adverse impacts relative to low-income and/or minority populations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5	Does the project involve substantial residential or commercial displacements or right of way acquisition?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6	Does the project include a determination under Section 4(f)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7	Is a project-level analysis for direct, indirect, or cumulative effects required based on the NCDOT community studies screening tool?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8	Does the project impact anadromous fish spawning waters?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
9	Does the project impact waters classified as Outstanding Resource Waters (ORW), High Quality Waters (HQW), Water Supply Watershed Critical Areas, 303(d)-listed impaired water bodies, buffer rules, or submerged aquatic vegetation (SAV)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10	Does the project impact Waters of the United States in any of the designated mountain trout streams?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11	Does the project require a US Army Corps of Engineers (USACE) Individual Section 404 Permit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
12	Will the project require an easement from a Federal Energy Regulatory Commission (FERC) licensed facility?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
13	Does the project include Section 106 of the National Historic Preservation Act (NHPA) effects determination other than a No Effect, including archaeological remains?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
14	Does the project involve GeoEnvironmental Sites of Concerns such as gas stations, dry cleaners, landfills, etc.?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
15	Does the project require work encroaching and adversely effecting a regulatory floodway or work affecting the base floodplain (100-year flood) elevations of a water course or lake, pursuant to Executive Order 11988 and 23 CFR 650 subpart A?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
16	Is the project in a Coastal Area Management Act (CAMA) county and substantially affects the coastal zone and/or any Areas of Environmental Concern (AEC)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Type III Actions (continued)</u>		Yes	No
17	Does the project require a US Coast Guard (USCG) permit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
18	Does the project involve construction activities in, across, or adjacent to a designated Wild and Scenic River present within the project area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
19	Does the project involve Coastal Barrier Resource Act (CBRA) resources?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
20	Does the project impact federal lands (e.g. US Forest Service (USFS), US Fish and Wildlife Service (USFWS), etc.) or Tribal (Trust) Lands?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
21	Does the project involve any changes in access control or the modification or construction of an interchange on an interstate?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
22	Does the project have a permanent adverse effect on local traffic patterns or community cohesiveness?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
23	Will maintenance of traffic cause substantial disruption?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
24	Is the project inconsistent with the STIP, and where applicable, the Metropolitan Planning Organization's (MPO's) Transportation Improvement Program (TIP)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
25	Does the project require the acquisition of lands under the protection of Section 6(f) of the Land and Water Conservation Act, the Federal Aid in Fish Restoration Act, the Federal Aid in Wildlife Restoration Act, TVA, Tribal Lands, or other unique areas or special lands that were acquired in fee or easement with public-use money and have deed restrictions or covenants on the property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
26	Does the project involve Federal Emergency Management Act (FEMA) buyout properties under the Hazard Mitigation Grant Program (HMGP)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
27	Is the project considered a Type I under the NCDOT's Noise Policy?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
28	Is there prime or important farmland soil impacted by this project as defined by the Farmland Protection Policy Act (FPPA)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
29	Is the project in an Air Quality non-attainment or maintenance area for a National Ambient Air Quality Standard (NAAQS)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
30	Are there other issues that arose during the project development process that affected the project decision?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

G. Additional Documentation as Required from Section F (ONLY for questions marked 'Yes'):

1. The proposed project has been reviewed for effects on the northern long-eared bat (NLEB), gray bat, and Appalachian elktoe. NCDOT has determined that the proposed action does not require separate consultation for the NLEB on the grounds that the proposed action is consistent with the final Section 4(d) rule. Based on the bridge type, and the lack of caves or mines in the project vicinity, the proposed project will have a biological conclusion of **May Affect Not Likely to Adversely Affect** for gray bats. While no mussels of any species were found within the project vicinity, there is habitat present within the survey reach. Therefore, the proposed project will have a biological conclusion of **May Affect Not Likely to Adversely Affect** for Appalachian elktoe.

15. The proposed project is not anticipated to impact floodway or floodplain elevation, however, there may be unintended consequences of removing existing bridge piers or adding riprap bank stabilization. Adverse impacts are not expected.

H. Project Commitments (attach as Green Sheet to CE Form):

## **NCDOT PROJECT COMMITMENTS**

STIP Project No. **B-4442**

Replace Bridges 100370 and 100373 on U.S. 19/23/25/70 (Future I-26) over  
Reems Creek and Quarry Road  
Buncombe County  
Federal Aid Project No. N/A  
WBS Element 38368.1.2

### **NCDOT Division 13 – Continued Coordination with Local Officials**

NCDOT should coordinate with the Buncombe County Emergency Services (Van Taylor Jones, ES Director, 828-250-6600) at least one month prior to construction.

NCDOT should coordinate with North Buncombe Public Schools (Fonda Durner, Director of Transportation, 828-232-4240) at least one month prior to construction.

### **NCDOT Hydraulics & Division 13 – FEMA Coordination**

The Hydraulics Unit will coordinate with the NC Floodplain Mapping Program (FMP), to determine status of 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 FEMA-regulated stream(s). Therefore, the Division shall submit sealed as-built construction plans to the Hydraulics Unit upon complete of project construction, certifying that the drainage structure(s) and roadway embankment that are located within the 100-year floodplain were built as shown in the construction plans, both horizontally and vertically.

I. Categorical Exclusion Approval:

STIP Project No.	<b>B-4442</b>
WBS Element	38368.1.2
Federal Project No.	N/A

**Prepared By:**

10/28/2021	<small>DocuSigned by:</small> <i>Celia Miars</i>
<u>                    </u>	<small>486519A84D364AC...</small>
Date	Celia Miars, AICP, Project Manager AECOM

**Prepared For:**

	<small>DocuSigned by:</small> <i>Verril</i>
	<small>292116A0688D4FC...</small>
	Verril McLeary, Project Manager NCDOT

**Reviewed By:**

10/28/2021	<small>DocuSigned by:</small> <i>Nathan Adima</i>
<u>                    </u>	<small>B239FBE49FF347A...</small>
Date	Nathan Adima, Senior Project Manager NCDOT

**Approved**

**Certified**      • If classified as Type III Categorical Exclusion.

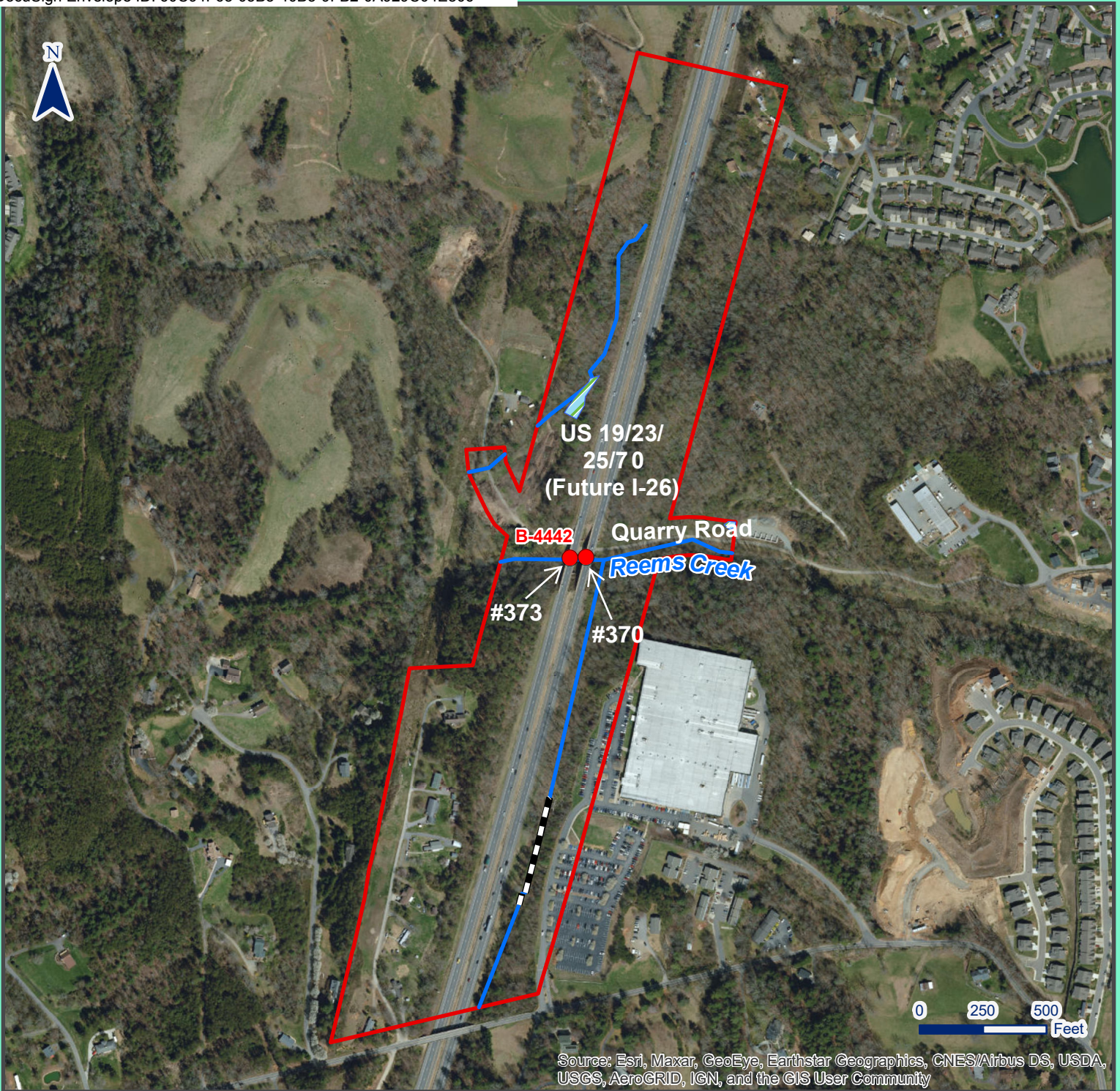
10/28/2021	<small>DocuSigned by:</small> <i>Beverly G. Robinson</i>
<u>                    </u>	<small>AD3EDBA89DAE4CD...</small>
Date	Beverly G. Robinson, CPM, Team Lead North Carolina Department of Transportation

FHWA Approved: For Projects Certified by NCDOT (above), FHWA signature required.

10/29/2021	<small>DocuSigned by:</small> <i>George Hoops</i>
<u>                    </u>	<small>9268FA57988149B...</small>
Date	for John F. Sullivan, III, PE, Division Administrator Federal Highway Administration

*Note: Prior to ROW or Construction authorization, a consultation may be required (please see Section VII of the NCDOT-FHWA CE Programmatic Agreement for more details).*





**B-4442:  
Replace Bridge 100370  
And Bridge 100373  
Over Reems Creek**



**Study Area  
Map**

**Figure 1**

January 2021

**Legend**

- Project Location
- Stream
- Culvert
- Wetland
- Study Area



This map is for reference only.  
Sources: Data was received by  
NC Department of Transportation,  
ESRI, NCFPM, AECOM



STATE OF NORTH CAROLINA  
DEPARTMENT OF TRANSPORTATION

ROY COOPER  
GOVERNOR

J. ERIC BOYETTE  
SECRETARY

September 9, 2021

**TO:** Jeff Hemphill, Environmental Senior Specialist  
Environmental Coordination & Permitting Group, EAU

**FROM:** Melissa Miller, Environmental Program Consultant  
Biological Surveys Group, EAU

**SUBJECT:** Section 7 survey results for the northern long-eared bat (*Myotis septentrionalis*), and gray bat (*Myotis grisescens*) associated with the replacement of Bridge Nos. 370 (EBL) and 373(WBL) over Reems Creek on US 19/23, US 25 and US 70 in Buncombe County, **TIP No. B-4442.**

The North Carolina Department of Transportation (NCDOT, Division 13) proposes to replace Bridge Nos. 370 and 373 over Reems Creek on US 19/23, US 25 and US 70 in Buncombe County, TIP No. B-4442. Characteristics for both bridges are the same. Both are four span structures with steel beams, concrete deck and end walls and metal guardrails. The overall length of each structure is 270 feet.

Northern long-eared bat

The project to replace Bridge Nos. 370 and 373 has been reviewed for effects on the northern long-eared bat (NLEB). As of May 4, 2015, NLEB is listed by the U.S. Fish and Wildlife Service (USFWS) as "Threatened" under the Endangered Species Act of 1973. As of September 9, 2021, NLEB is listed in IPaC (<https://ecos.fws.gov/ipac/>) as occurring in Buncombe County. USFWS also established a final rule under the authority of section 4(d) of the Endangered Species Act that provides measures for the conservation of NLEB. The USFWS has tailored the final 4(d) rule to prohibit the take of NLEB from certain activities within areas where they are in decline. This incidental take protection applies only to known NLEB occupied maternity roost trees and known NLEB hibernacula. Effective February 16, 2016, incidental take resulting from tree removal is prohibited if it 1) occurs within a ¼ mile radius of known NLEB hibernacula; or 2) cuts or destroys known occupied maternity roost trees or any other trees within a 150-foot radius from the known maternity tree during the pup season (June 1-July 31).

According to the North Carolina Natural Heritage Program (NHP) Biotics Database, most recently updated July 2021, **the nearest NLEB hibernacula record is 18 miles northeast of the project and no known NLEB roost trees occur within 150 feet of the project area.**

NCDOT has also reviewed the USFWS Asheville Field office website ([http://www.fws.gov/asheville/htmls/project\\_review/NLEB\\_in\\_WNC.html](http://www.fws.gov/asheville/htmls/project_review/NLEB_in_WNC.html)) for consistency with NHP records. This project is located entirely outside of the red highlighted areas (12-digit HUC) that the USFWS Asheville Field Office has determined to be representative of an area that may require consultation. The closest 12 digit (060101080301) red HUC is approximately 18.5 miles away (Headwaters Cane River).

For the proposed action, NCDOT has committed to the conservation measures listed below:

- 1) No alterations of a known hibernacula entrance or interior environment if it impairs an essential behavioral pattern, including sheltering northern long-eared bats (January 1 through December 31);
- 2) No tree removal within a 0.25 mile radius of a known hibernacula (January 1 through December 31); and
- 3) No cutting or destroying a known, occupied maternity roost tree, or any other trees within a 150-foot radius from the known, occupied maternity tree during the period from June 1 through and including July 31.

**NCDOT has determined that the proposed action does not require separate consultation on the grounds that the proposed action is consistent with the final Section 4(d) rule**, codified at 50 C.F.R. § 17.40(o) and effective February 16, 2016. NCDOT may presume its determination is informed by best available information and consider Section 7 responsibilities fulfilled for NLEB.

#### Gray bat

The project to replace Bridge Nos. 370 and 373 has also been reviewed for effects on the gray bat (MYGR). As of April 28, 1976, the gray bat was listed by the U.S. Fish and Wildlife Service (USFWS) as “Endangered” under the Endangered Species Act of 1973. As of September 9, 2021, MYGR is listed in IPaC (<https://ecos.fws.gov/ipac/>) as occurring in Buncombe County.

According to the North Carolina Natural Heritage Program (NHP) Biotics Database, most recently updated in July 2021, MYGR have been documented in Buncombe County. USFWS, North Carolina Wildlife Resources Commission (WRC) and NHP data indicate that **the closest known occurrence of MYGR is approximately 3 miles northeast of the project site.**

On June 9, 2021, NV5 biologists assessed bridge Nos. 370 and 373 for potential gray bat habitat. Suitable roosting crevices were present. No evidence of bats (bats, staining, or guano) was observed. Both bridges were previously surveyed in 2019 by NV5 biologists as part of A-10. No evidence of bats in any form (bats, guano, staining) was observed during that survey. No caves or mines are located within the project footprint or within line of sight of the bridge. Based on the bridge type, and the lack of caves or mines in the project vicinity, the proposed project will have a biological conclusion of ***MAY AFFECT NOT LIKELY TO ADVERSELY AFFECT*** for gray bats.

If you need any additional information, please contact Melissa Miller at 919-707-6127.

21-05-0004



## HISTORIC ARCHITECTURE AND LANDSCAPES NO HISTORIC PROPERTIES AFFECTED 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-4442	<b>County:</b>	Buncombe
<b>WBS No.:</b>	38368.1.2	<b>Document Type:</b>	CE
<b>Fed. Aid No:</b>	unassigned	<b>Funding:</b>	<input checked="" type="checkbox"/> State <input checked="" type="checkbox"/> Federal
<b>Federal Permit(s):</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<b>Permit Type(s):</b>	USACE

**Project Description:**

Replace Bridges 370 and 373 on I-26 (US 19/23/25/70) over Reems Creek and Quarry Road in Buncombe County. The study area is an approximate 4,000-foot long corridor running north of Aiken Road to Salem Road. While currently state-funded, Federal funds may be used during construction of this project. Once part of the A-0010A project, the two bridges are being pulled out to be replaced since the A-0010A is progressing slowly.

**Description of review activities, field surveys, results, and conclusions:**

Review of extended project area on HPOWeb GIS data was conducted in June 2021. There are no existing NR, SL, DE, LD or SS properties in the project area. The entire study area was surveyed for historic resources in 2017 during the studies for A-0010A and no historic resources were identified in this area. The two bridges were also evaluated for NR eligibility and determined to be not eligible. There is no need to conduct further surveys and the subsequent effects consultations with HPO confirm that there are no historic resources in this study area that would be affected by the project.

### SUPPORT DOCUMENTATION

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



**FINDING BY NCDOT ARCHITECTURAL HISTORIAN**

Historic Architecture and Landscapes – **NO HISTORIC PROPERTIES AFFECTED**

**Mary Pope Furr**

**7/1/2021**

NCDOT Architectural Historian

Date



## Background Research

A site files search was conducted using data from the Office of State Archaeology (OSA) on May 27, 2021 (HPOWEB 2021). No previous archaeological investigations have been carried out within the project limits, and no recorded archaeological sites are within the area. However, the larger I-26 improvement corridor (TIP A-0010A) was recommended for survey by the State Historic Preservation Office (SHPO) in April 2020 (see Attachment 1). The site file review also identified six known sites (31BN7, 31BN11, 31BN19, 31BN285, 31BN860, and 31BN861) are within a mile project. Information is limited at all the site as three (31BN7, 31BN11, and 31BN19) were recorded by the University of North Carolina at Chapel Hill in the 1960s, one (31BN285) by the Office of State Archaeology in 1985, and two (31BN860 and 31BN861) by an amateur archaeologist. All the sites show evidence of precontact occupations and have yet to be assessed for the National Register. Portion of at least three sites (31BN7, 31BN11, and 31BN860) reside or extend on to ridge or hill tops made up of Clifton clay loam (CkC2), while another two (31BN7 and 31BN19) are situated partially on floodplains composed of Rosman fine sandy loam (RsA) before they continue onto terraces or ridges. These known archaeological sites, found in a setting similar to the current project area, suggest unrecorded archaeological resources may be present. As a result, an investigation for the B-4442 project area was recommended.

According to the North Carolina State Historic Preservation Office online data base (HPOWEB 2021), there are no known historic architectural resources within the APE that may yield intact archaeological deposits.

An examination of historic maps concerning this project failed to find any significant features within APE. The 1901 USGS Asheville topographic map is one of the first to display a reliable location for the project (Figure 2). This map depicts Reems Creek with no crossing at the current bridge site. Nearby structures are outside of the project area to the south, east, and west. The later 1920 *Soil Map for Buncombe County* illustrates the same picture (Perkins et al. 1920) (Figure 3). Finally, the 1938 *North Carolina State Highway Map for Buncombe County* displays the first modern road alignments for the county (NCSHPWC 1938) (Figure 4). However, no roads or crossings are in the vicinity. Overall, the historic resources suggest that no historic deposits will be encountered.

The USDA soil survey shows the newly revised APE composed of six soil types (USDA NRCS 2021) (Figure 5). The hillsides are made up of Clifton clay loam (CkD2), the Evard-Cowee complex (EvD2), and the Walnut-Oteen-Mars Hill complex (WaD2). They encompass about 28 percent of the current APE. These are well drained soils with a slope of 15 to 30 percent. Soil erosion is also moderate. No significant archaeological deposits are expected on landforms with a slope of 15 percent or more, and therefore no subsurface tests are required on these series. The ridge tops consist also of Clifton clay loam (CkC2) but have a more gradual slope of 8 to 15 percent. Soil erosion is still considered moderate. The floodplain is of Rosman fine sandy loam (RsA). This is a well drained soil with a slope of less than 3 percent. It is subject to occasional flooding. These level soils make up about 10 percent of the current APE. They are well suited for evidence of early habitation if ground disturbance is low. Subsurface testing is recommended for these locations. Finally, the area along I-26 and a ridge top to the northwest consist of Udorthents loam (Ud) and the Udorthents-Urban land complex (UhE). These are disturbed soils in which their original characteristics have been altered by earth moving activities. They represent 62 percent of the current APE. Significant archaeological sites are not likely to be present on these soils.

## Fieldwork Results

The archaeological field reconnaissance and survey for the proposed replacement of Bridge Nos. 370 and 373 on I-26 over Reems Creek was conducted on July 13, 2021. The investigation included a visual inspection and the excavation of five shovel tests (STPs) (see Figure 5). Shovel tests were judgmentally placed on landforms that were fairly level including ridge tops and the floodplain. No additional STPs were excavated on steep slopes or in areas that showed signs of obvious ground disturbance.

The project area is situated roughly north to south crossing Reems Creek, which meanders west emptying into the French Broad River. The area consists mostly of ridge tops and very steep hillside slopes; but a narrow floodplain runs along the north side of Reems Creek, while a drainageway for an unnamed tributary is in the southeast quadrant adjacent to I-26 (see Figure 5). The floodplain is entirely disturbed within the APE from a sewage pipeline running next to the creek (Figures 6 and 7). This was confirmed with the excavation of two STPs (#1 and 2), which produced only fill material. The adjacent tributary also appears to have been modified and straighten with the construction of I-26. Properties alongside I-26 are mostly densely vegetated with some residential lawns in the southwest quadrant along S. Haven Road. In general, soils were either greatly disturbed or steeply sloped.

The field investigations consisted of visually inspection of the APE with a walk-over. Fairly level locations were identified and judgmental STPs were excavated. The first two STPs were in the floodplain and confirmed the presents of a buried sewage pipeline. Manholes were found a considerable distance to the west. STPs 3 and 4 were excavated on ridge tops in the northeast quadrant. STP 3 displayed a disturbed upper soil layer of approximately 40 cm followed by very compact layer of fill. STP 4 produced a 20 cm thick layer of brown (10YR 4/3) sandy loam at the surface followed by subsoil, which is a yellow brown (10YR 5/6) clay loam. STP 5 is on a ridge top to the southwest. The upper soil layer at this test was a 25 cm thick brown (10YR 4/4) loam. Below this is subsoil, which again is a yellow brown (10YR 5/6) clay loam. No cultural material was identified in any of the shovel tests. In addition, no artifacts were seen on the surface, and no surface features such as rock shelters or standing ruins were observed during the visual inspection.

### Recommendations

The archeological investigations for the proposed replacement of Bridge Nos. 370 and 373 on I-26 over Reems Creek in Buncombe County identified no archaeological sites. All STPs were negative for cultural material, and no resources were seen above ground. It is very unlikely significant archaeological sites are present as disturbance is high and landforms are steeply sloped. No further archaeological work is recommended for this project. However, if design plans change to impact areas outside of the archaeological APE, then further consultation might be necessary.


This project falls within a North Carolina County in which the Catawba Indian Nation, the Eastern Band of Cherokee Indians, the Cherokee Nation, the United Keetoowah Band of Cherokee Indians, and Muscogee (Creek) Nation have expressed an interest. We recommend that you ensure that this documentation is forwarded to these tribes using the process described in the current NCDOT Tribal Protocol and PA Procedures Manual.

### SUPPORT DOCUMENTATION

See attached:  Map(s)     Previous Survey Info     Photos     Correspondence

Other: historic map images

Signed:



7/20/21

C. Damon Jones  
NCDOT ARCHAEOLOGIST

Date



**REFERENCES CITED****HPOWEB**

- 2021 North Carolina State Historic Preservation Office GIS Web Service.  
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1938 *North Carolina State Highway Map for Buncombe County*. North Carolina State Highway and Public Works Commission, Raleigh.
- Perkins, Samuel, Robert Devereux, Samuel Davidson, and William Davis  
1920 *Soil Map for Buncombe County, North Carolina*. U.S. Department of Agriculture, Government Printing Office, Washington D.C.
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<http://webosilsurvey.nrcs.usda.gov/app/>. Accessed May 26, 2021.
- United States Geological Survey (USGS)  
1901 Asheville, North Carolina-Tennessee 30 minute quadrangle map. Reprinted in 1907.  
2016 Asheville, North Carolina 7.5 minute quadrangle map.

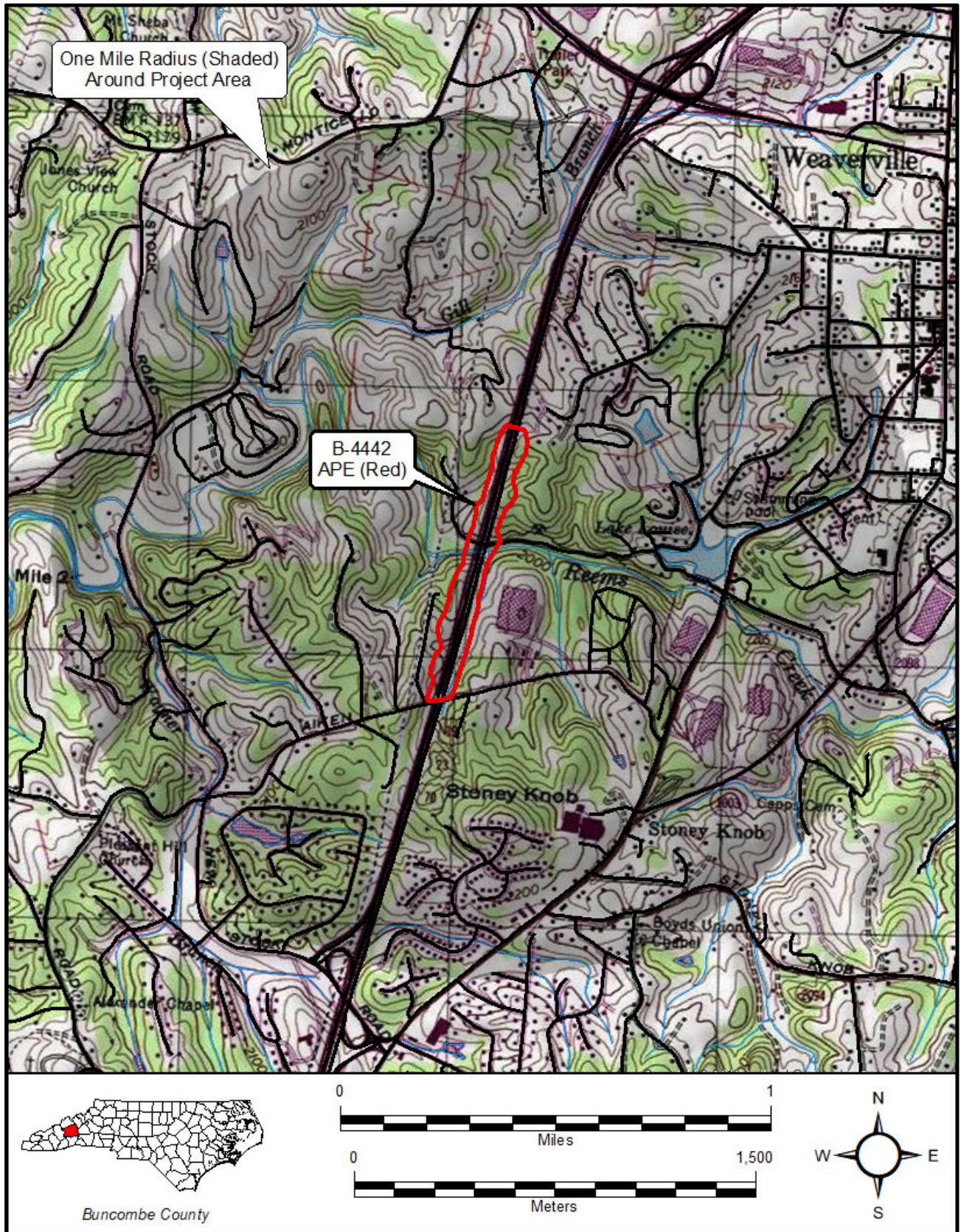


Figure 1. Topographic Setting of the Project Area, Asheville (2016) NC USGS 7.5' Topographic Quadrangle.

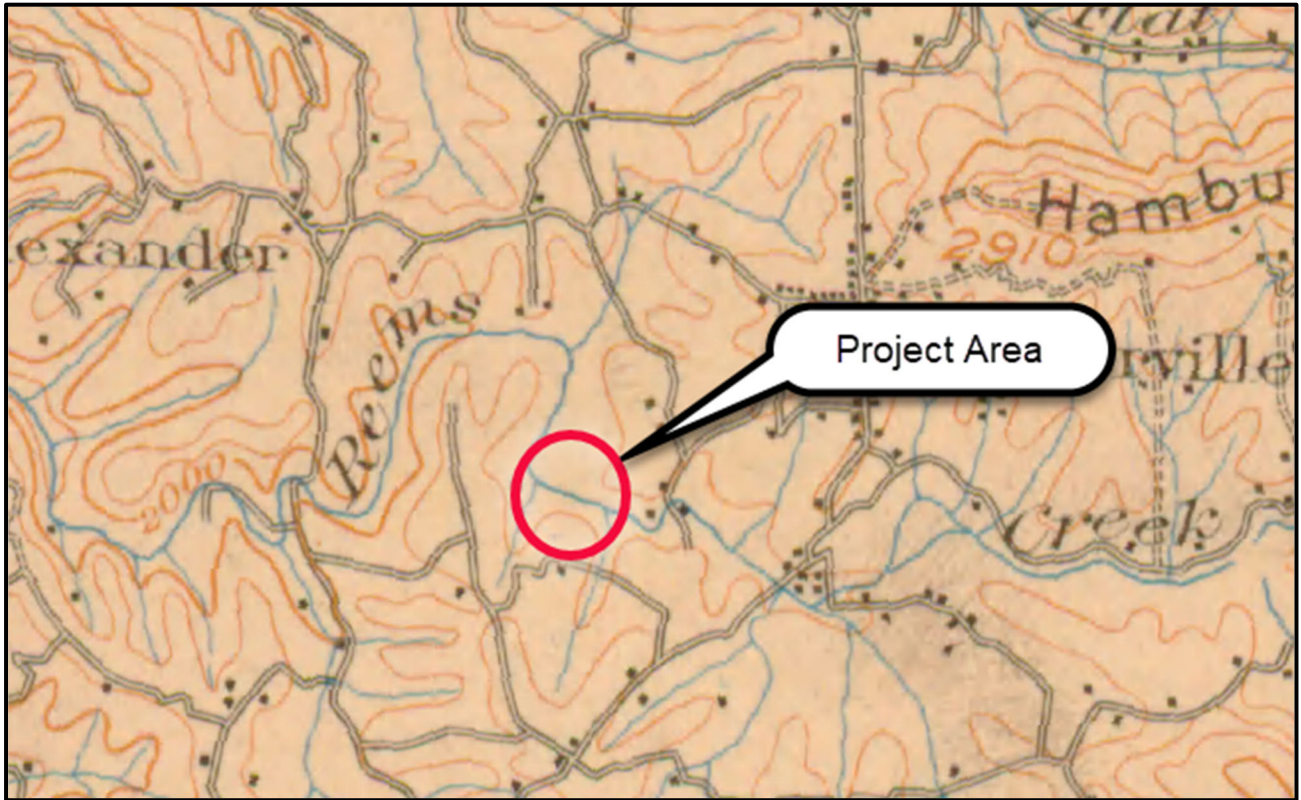


Figure 2. The 1901 USGS Asheville topographic map showing the location of the project area.

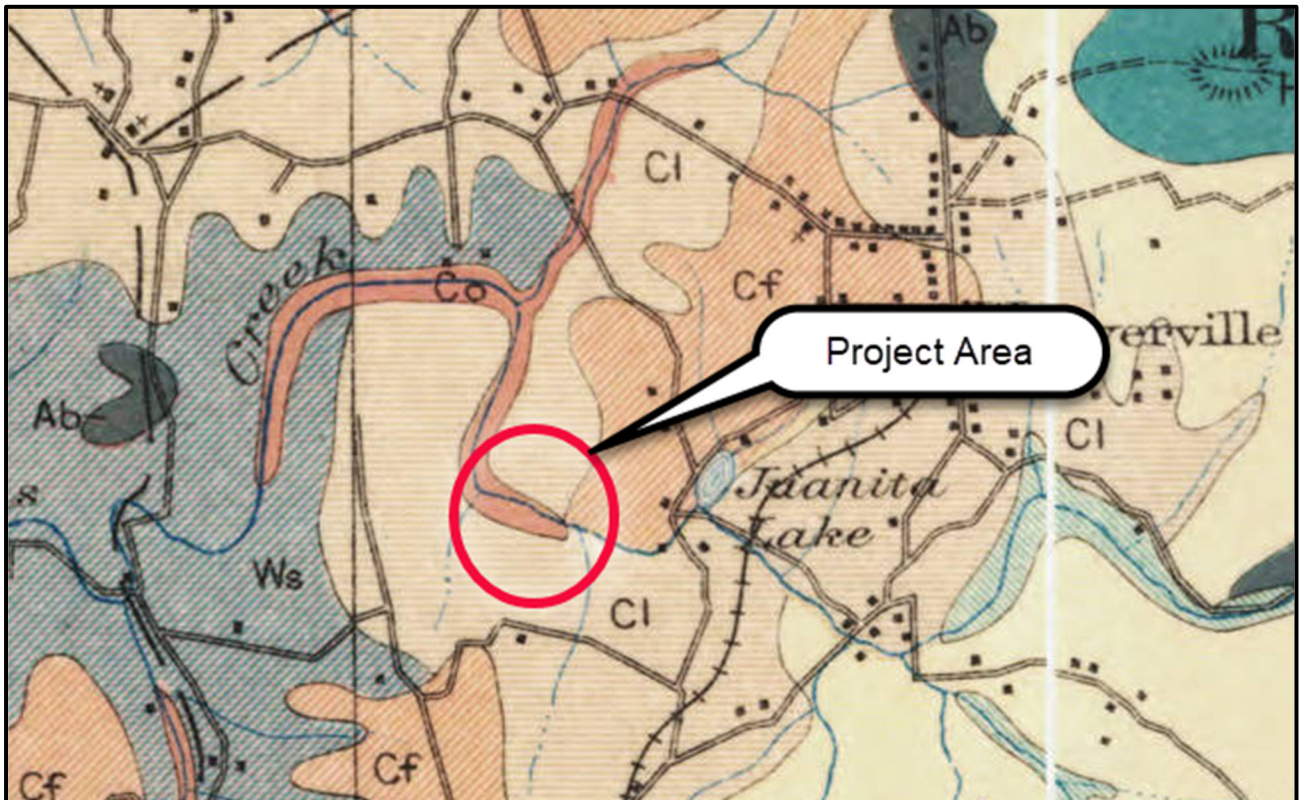


Figure 3. The 1920 Soil Map for Buncombe County showing the location of the project area.

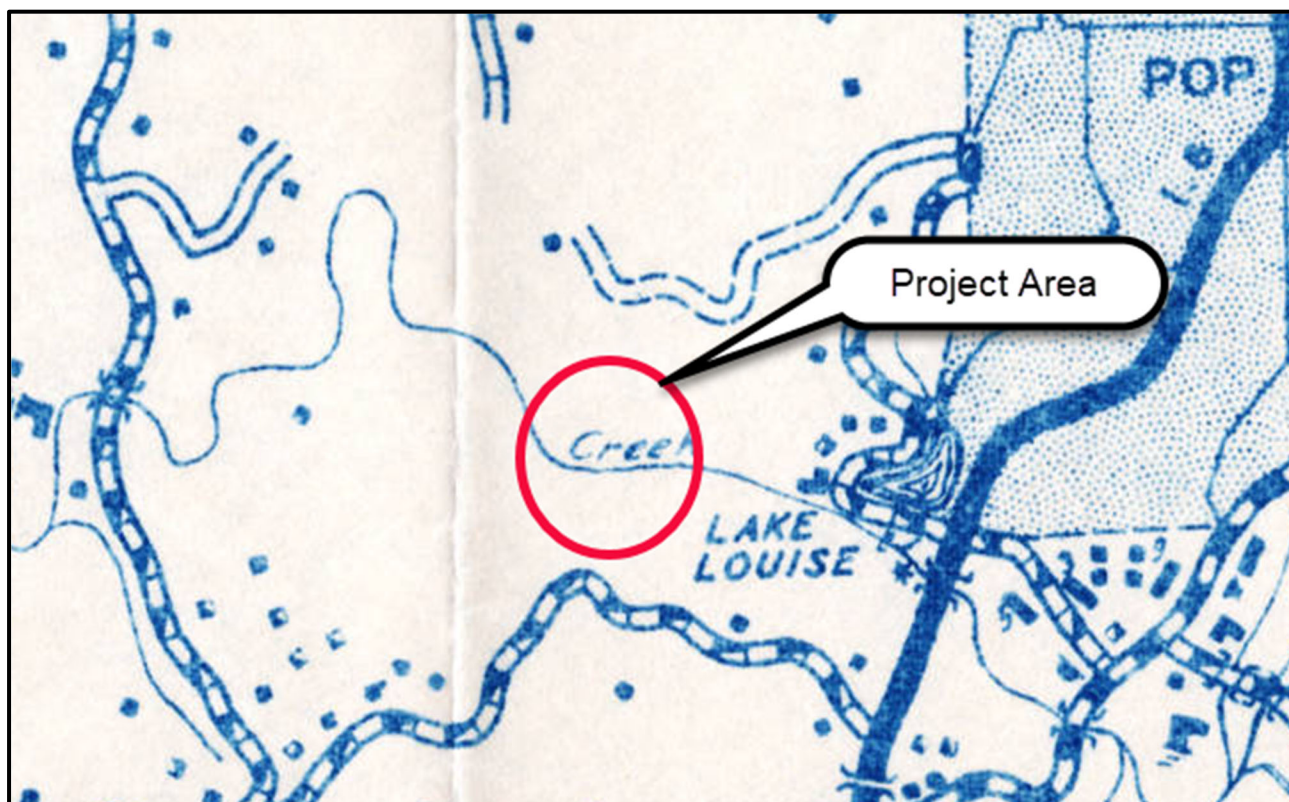


Figure 4. The 1938 *North Carolina State Highway Map for Buncombe County* showing the location of the project area.

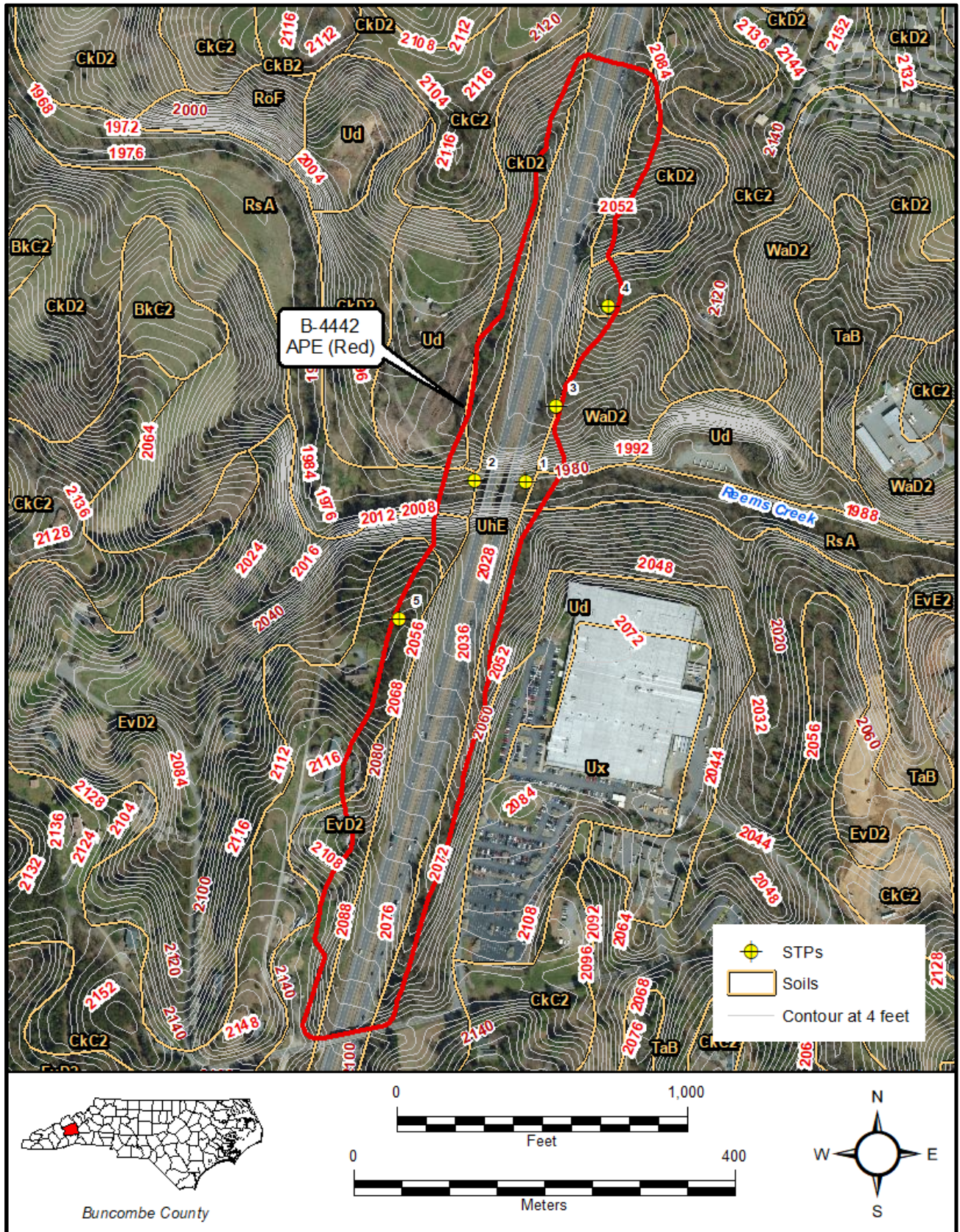


Figure 5. Aerial view of the project area showing landforms, contours, and STPs.



Figure 6. General view of the sewage pipeline in the floodplain looking west from under the bridges.



Figure 7. General view of the sewage pipeline in the floodplain looking east from under the bridges.



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

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Governor Roy Cooper  
Secretary Susi H. Hamilton

Office of Archives and History  
Deputy Secretary Kevin Cherry

April 29, 2020

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Re: US 19/23, Future I-26, Improvements, A-0010A, Buncombe County, ER 13-2173

Dear Ms. Workman-Maurer:

Thank you for your email of March 16, 2020, reinitiating the archaeological review for the above-referenced project. We have reviewed the materials provided and offer the following comments.

We recommend that a comprehensive archaeological survey be conducted prior to the initiation of any ground disturbing activities within the project area. The purpose of this survey is to locate archaeological sites and make recommendations regarding their eligibility status in terms of the National Register of Historic Places.

The work should be conducted by an experienced archaeologist who meets the Secretary of the Interior professional qualification standards. A list of archaeological consultants who have conducted or expressed an interest in contract work in North Carolina is available at <https://archaeology.ncdcr.gov/archaeological-consultant-list>. The archaeologists listed, or any other experienced archaeologist, may be contacted to conduct the recommended survey. Please note that our office now requests consultation with the Office of State Archaeology Review Archaeologist to discuss appropriate field methodologies prior to the archaeological field investigation.

One paper copy and one digital copy (PDF) of all resulting archaeological reports, as well as a digital copy (PDF) of the North Carolina Site Form for each site recorded, should be forwarded to the Office of State Archaeology (OSA) through this office, for review and comment as soon as they are available and in advance of any construction or ground disturbance activities. OSA's *Archaeological Standards and Guidelines for Background Research, Field Methodologies, Technical Reports, and Curation* can be found online at: [https://files.nc.gov/dncr-arch/OSA\\_Guidelines\\_Dec2017.pdf](https://files.nc.gov/dncr-arch/OSA_Guidelines_Dec2017.pdf).

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.


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Location: 109 East Jones Street, Raleigh NC 27601 Mailing Address: 4617 Mail Service Center, Raleigh NC 27699-4617 Telephone/Fax: (919) 807-6570/807-6599

Attachment 1. Copy of SHPO letter recommending an archaeological survey for the TIP A-0010A.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

  
for Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Matt Wilkerson, NCDOT

[mtwilkerson@ncdot.gov](mailto:mtwilkerson@ncdot.gov)

Attachment 1. Copy of SHPO letter recommending an archaeological survey for the TIP A-0010A (continued).