

Appendix F

Coordination Relating to Section 4(f) *de Minimis*

This page intentionally left blank.

Federal Aid #: **MANHF26-1(53)**

TIP#: **I-2513B**

County: **Buncombe**

CONCURRENCE FORM FOR ASSESSMENT OF EFFECTS

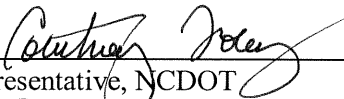
Project Description: Proposed I-26 Connector in Asheville

On 16 February 2010, representatives of the

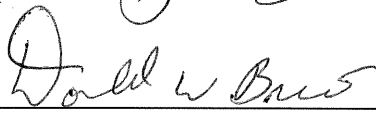
- North Carolina Department of Transportation (NCDOT)
- Federal Highway Administration (FHWA)
- North Carolina State Historic Preservation Office (HPO)
- Other

Reviewed the subject project and agreed on the effects findings listed within the table on the reverse of this signature page.

Signed:



Representative, NCDOT 27 APRIL 2010
Date



FHWA, for the Division Administrator, or other Federal Agency 4-27-10
Date

Representative, HPO Date



State Historic Preservation Officer 4.27.10
Date

Federal Aid #: **MANHF26-1(53)**

TIP#: **I-2513B**

County: **Buncombe**

Property and Status	Alternative	Effect Finding	Reasons
Buncombe County Bridge No. 216 (DE)	Section A All alternatives	No Adverse Effect	The bridge will remain in place and protective measures will be utilized during construction.
Friendly Grocery Store (DE)	Section A All alternatives	No Adverse Effect	There will be no direct impacts to the structure and NCDOT agrees to seek comments from HPO on the final plans of the retaining wall and/or the sidewalk as well as the drainage plans.
West Asheville/ Aycock School Historic District (DE)	Section A All alternatives	Adverse Effect	Project requires direct impacts to the property of the Aycock School as well as potential impacts to the existing stone wall, arrowhead monument, and several trees at the school. Additional right-of-way will need to be acquired within the district's boundaries.
Asheville School (NR)	Section C All alternatives	No Adverse Effect	There are minimal right-of-way acquisitions. Taken as a whole, they do not significantly diminish the integrity or significance of the property.
Biltmore Estate (NR, NHL)	Section C All alternatives	Adverse Effect	Each alternative requires widening existing Interstate 40 within the boundaries of the National Historic Landmark.
Buncombe County Bridge No. 151 (Great Smoky Mountain Park Bridge) (DE)	Section B Alternatives 3, 4, & 4B	No Effect	There will be no construction activities that directly impact the bridge on the listed alternatives.
C. G. Worley House (DE)	Section B Alternatives 3, 4, & 4B	No Adverse Effect	Each alternative will require some right-of-way acquisition and a permanent underground easement for a soil-nail retaining wall will utilize top down construction. Clearing will only occur to the right-of-way limits.

Initialed: **NCDOT *CH***

FHWA

RB

HPO *Rye*

FHWA intends to use SHPO's concurrence as a basis of a "de minimis" finding for the following properties, pursuant to Section 4(f): *Asheville School*
13B Concurrence Form For Assessment of Effects

C.G. Worley House

Federal Aid #: **MANHF26-1(53)**

TIP#: **I-2513B**

County: **Buncombe**

Property and Status	Alternative	Effect Finding	Reasons
Mrs. Minnie Alexander Cottage (NR)	Section B Alternatives 3, 4, & 4B	No Effect	There will be no construction activities that directly impact the house on the listed alternatives.
Haywood Street United Methodist Church (DE)	Section B Alternatives 3, 4, & 4B	No Effect	There will be no construction activities that directly impact the property on the listed alternatives.
Whiteford G. Smith House (NR)	Section B Alternatives 3, 4, & 4B	No Effect	There will be no construction activities that directly impact the house on the listed alternatives.
Freeman House (DE)	Section B Alternative 3	No Adverse Effect	There will be a change in noise levels but not enough to adversely affect the property. No construction activities will directly impact the property on this alternative.
Freeman House (DE)	Section B Alternatives 4 & 4B	Adverse Effect	Alignment is not within the property boundary but four new elevated bridges will be constructed that will be visible from the house.
Montford Area Historic District (NR) and Boundary Expansion (DE)	Section B Alternatives 3 & 4	No Effect	There will be no construction activities that directly impact the district on the listed alternatives. Alternatives are on the other side of the French Broad River.
Montford Area Historic District (NR) and Boundary Expansion (DE)	Section B Alternative 4B	Adverse Effect	Permanent easements will be needed for construction of earth retaining walls, although there is no right-of-way acquisition. Retaining walls create visual impacts to historic district.

Initialed: CPH NCDOT

DB FHWA

RSE HPO



September 12, 2007

Vincent J. Rhea, PE
Project Development Engineer
PDEA Branch
NCDOT
1548 Mail Service Center
Raleigh, NC 27699-1548

RE: *De minimis* impact statement for project I-2513

Mr. Rhea,

It is my understanding that the I-26 connector project will include widening and improvements to exiting I-240 and Amboy Road in the vicinity of Carrier Park. The proposed preliminary plans for this project will effect both the proposed French Broad River Greenway extension (FBRG) and Carrier Park. As these are public recreational facilities, I understand the project is subject to the requirements of United States Code (USC) Title 23 in Section 138 (Section 4(f)), the United States Department of Transportation (USDOT), known as Section 4(f) of the DOT Act.

As stated in Section 4(f) of the above, "the United States Department of Transportation (USDOT) shall not approve any program or project which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State or local significance as determined by the Federal, State, or local officials having jurisdiction thereof unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge resulting from such use".

It is my understanding that the preliminary plans for the project have been revised to minimize the impacts to the FBRG and Carrier Park. The widening would shift the proposed FBRG slightly southward for a modest portion, but not adversely affect its use. The widening would also encroach into the parking area in front of the Carrier Park restroom facility as well as a short section of the FBRG. The department planned to remove the parking area in the future so it will not adversely affect this function. The State expressed a willingness to remove the parking lot area and landscape it in an attractive manner. The state would work with City staff on the overall design which includes minimizing potential retaining walls that would be required with the widening.

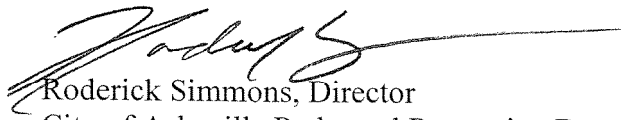
P.O. Box 7148 • Asheville, N.C. 28802 • 828-259-5800 • www.ashevilleparks.org

Access to the existing parking lots north and south of the restroom facility would be maintained.

My staff as well as the Greenway Commission and Parks and Recreation Advisory Board has reviewed the preliminary plans and have concluded that the proposed I-2513 project will not adversely affect the activities, features, and attributes of Carrier Park and the existing and proposed FBRG. The City expects the State to rebuild and relocate any portion of greenway trail that is negatively impacted by this widening project at the States expense, including, but not limited to re-negotiating easements.

This letter shall not be interpreted as giving consent for the City to enter into land negotiations with the State. City Council approval must be obtained for any land transaction involving City-owned land. Preferably, we would like to approach City Council with land transaction proposals for all properties slated to be effected by the widening project at one time. Lastly, please present the preliminary drawings to Karen Cragolin, Executive Director of RiverLink, for her comments. RiverLink donated the Carrier Park property to the City and as a courtesy we like to include RiverLink in conversations about future park development.

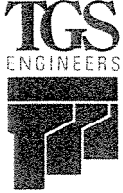
Sincerely,


Roderick Simmons, Director
City of Asheville Parks and Recreation Department

Cc: Ken Burleson, Al Kopf, Seth Hendler

Suite 141
975 Walnut Street
Cary, North Carolina 27511
Phone 919 319 8850
Fax 919 319 6999

April 20, 2007



Mr. Jim Orr, Superintendent
Parks and Public Facilities Division
City of Asheville
Parks and Recreation Department
PO Box 7148
Asheville, NC 28802

Subject: New Route, Asheville, NC, I-26 Connector along I-240 from existing I-26 to US 19-23-70 in Buncombe County, NCDOT Division 13, NC TIP No. I-2513, BSIP WBS Element 34165.1.2, State Project 8.U843 701, Federal No. MANHF 26-1 (53)

Dear Mr. Orr:

Thank you for taking the time to meet with me on Friday, April 13 to review the proposed modifications to the subject project preliminary plans in order to minimize effects on the Carrier Park and French Broad River Greenway. We have added the driveway connection we discussed and sent Al Kopf a copy of the revised plans with cross sections in the area along Amboy Road in front of Carrier Park.

To keep the project on schedule, NCDOT needs to document your concurrence that the proposed project plans will not adversely affect the activities, features, and attributes of Carrier Park and the existing and proposed French Broad River Greenway. NCDOT will be sending you a letter informing you of the Section 4(f) evaluation procedures necessary for the project use of the park property and greenway alignment.

If you have any questions or I can provide additional information, please let me know as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Kenneth Burleson', written over a horizontal line.

J. Kenneth Burleson, P.E.
TGS Engineers

JKB:jdw
cc: File



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

MICHAEL F. EASLEY
GOVERNOR

LYNDO TIPPETT
SECRETARY

April 18, 2007

Mr. Jim Orr, Superintendent
Parks and Public Facilities Division
City of Asheville
Parks and Recreation Department
PO Box 7148
Asheville, NC 28802

Subject: New Route, Asheville, NC, I-26 Connector along I-240 from existing I-26 to US 19-23-70 in Buncombe County, NCDOT Division 13, NC TIP No. I-2513, BSIP WBS Element 34165.1.2, State Project 8.U843701, Federal No. MANHF 26-1 (53)

Dear Mr. Orr:

The North Carolina Department of Transportation is writing a Draft Environmental Statement for the I-26 Connector. The project will include widening and improvements to exiting I-240 and Amboy Road in the vicinity of Carrier Park. The proposed preliminary plans for this project will affect both the proposed French Broad River Greenway extension and Carrier Park. As these are public recreational facilities, the project is subject to the requirements of United States Code (USC) Title 23 in Section 138 (Section 4(f)), the United States Department of Transportation (USDOT), known as Section 4(f) of the DOT Act.

As stated in Section 4(f) of the above, "the United States Department of Transportation (USDOT) shall not approve any program or project... which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State or local significance as determined by the Federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State or local significance as so determined by such officials unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use".

MAILING ADDRESS:
NC DEPARTMENT OF TRANSPORTATION
PROJECT DEVELOPMENT AND ENVIRONMENTAL ANALYSIS
1548 MAIL SERVICE CENTER
RALEIGH NC 27699-1548

TELEPHONE: 919-733-7844
FAX: 919-733-9794

WEBSITE: WWW.DOH.DOT.STATE.NC.US

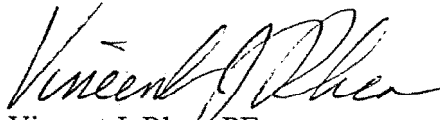
LOCATION:
TRANSPORTATION BUILDING
1 SOUTH WILMINGTON STREET
RALEIGH NC

We understand that you have had an opportunity to review the project preliminary plans that have been revised to minimize effects to these facilities. *De minimis* impacts on publicly owned parks, recreation areas, and wildlife and waterfowl refuges are defined as those that do not "adversely affect the activities, features and attributes" of the Section 4(f) resource. If the City official(s) with jurisdiction over the property will provide written concurrence that the proposed I-2513 project will not "adversely affect the activities, features, and attributes that qualify" Carrier Park and the existing and proposed French Broad River Greenway for protection under Section 4(f), the Federal Highway Administration intends to make a *de minimis* finding regarding these facilities. A letter to me stating concurrence would be sufficient.

Please note that the coordination efforts with the City to minimize project impacts to these facilities will be continued throughout the project planning and design process. We will also provide an opportunity for public involvement during the public hearing once the 4(f) *de minimis* documentation requirements are satisfied.

The NCDOT looks forward to working with you and your staff to minimize any effects on these recreational facilities with the proposed project. If I can provide additional information, please let me know.

Sincerely,



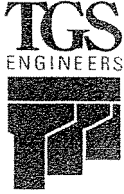
Vincent J. Rhea, PE
Project Planning Engineer

Cc: Jake Riggsbee, PE, FHWA
Files

Suite 141
975 Walnut Street
Cary, North Carolina 27511
Phone 919 319 8850
Fax 919 319 6999

Page 1 of 2

April 10, 2007



Mr. Jim Orr, Superintendent
Parks and Public Facilities Division
City of Asheville
Parks and Recreation Department
PO Box 7148
Asheville, NC 28802

Subject: New Route, Asheville, NC, I-26 Connector along I-240 from existing I-26 to US 19-23-70 in Buncombe County, NCDOT Division 13, NC TIP No. I-2513, BSIP WBS Element 34165.1.2, State Project 8.U843701, Federal No. MANHF 26-1 (53)

Dear Mr. Orr:

The NC Department of Transportation is planning the proposed I-26 Connector which will include widening and improvements to exiting I-240 in the vicinity of SR 3556, Amboy Road. The improvements as currently planned will affect both the proposed French Broad River Greenway extension and Carrier Park near the Amboy Road interchange. As these are public recreational facilities, the project is subject to the requirements of United States Code (USC) Title 23 in Section 138 (Section 4(f)), the United States Department of Transportation (USDOT), known as Section 4(f) of the DOT Act. According to Section 4(f) the United States Department of Transportation (USDOT):

...shall not approve any program or project...which requires the use of any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State or local significance as determined by the Federal, State, or local officials having jurisdiction thereof, or any land from an historic site of national, State or local significance as so determined by such officials unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, wildlife and waterfowl refuge, or historic site resulting from such use.

We have identified the park facilities and boundaries as well as the proposed alignment of the greenway and included them on our base plans for the improvements to I-240 and Amboy Road in the area. As a result, we have included several modifications to our plans to avoid these facilities. However, these plans indicate a small amount of right of way and easement will be required from Carrier Park and approximately 300 feet of the proposed French Broad River Greenway extension will need to be reconstructed by our project.

The principal purpose of the scheduled April 13 meeting with you and your staff is to present our preliminary plans with these proposed modifications and to document your comments and suggestions. I have assembled the following questions concerning these facilities that we can hopefully address at this meeting.

1. Were there any LWCF funds used in the development of either of these facilities? (The Land

and Water Conservation Fund Act (Section 6(f)) at 16 USC 460 is a primary funding source of the US Department of the Interior for outdoor recreation development and land acquisition by local governments and state agencies. The National Park Service, U.S. Department of the Interior, administers the program on behalf of the federal government. Authority for the program at the state level is vested in the N.C. Department of Environment and Natural Resources and the State Liaison Officer appointed by the Governor.)

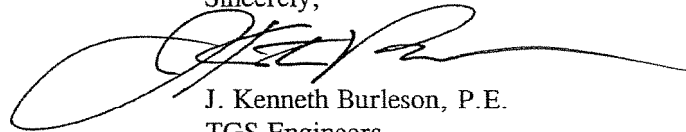
2. Are there any restrictive covenants attached to the deeds for these facilities? If so, we may need to obtain copies of these restrictions.
3. Are there documented future plans for improvements to Carrier Park? If so, we would like to discuss these plans and if possible obtain copies of plans locating any proposed facilities.
4. Of the several routes available, is there an official routing of the French Broad River Greenway through Carrier Park?
5. Has the right of way for the proposed French Broad River Greenway been obtained? If so, was it purchased fee simple or obtained through easement?
6. What are the horizontal clearance requirements for the proposed French Broad River Greenway?

To satisfy Section 4(f), NCDOT must document the coordination with the City to minimize impacts to these facilities. The goal is to obtain and document the City's concurrence that the project includes all possible planning to minimize harm to these recreational facilities.

We look forward to working with you and your staff to minimize any effects on these recreational facilities with the construction of this important transportation improvement.

If I can provide additional information, please let me know.

Sincerely,



J. Kenneth Burlison, P.E.
TGS Engineers

JKB: jdww

cc: File

Federal Aid #: MANHF26-1(53)

TIP#: I-2513

County: Buncombe

CONCURRENCE FORM FOR ASSESSMENT OF EFFECTS

Project Description: Proposed I-26 Connector from I-40/I-26 in southwestern Asheville to US 19-23-70 in northwest Asheville for total length of approximately 7 miles

On *May 19, 2015*, representatives of the

- North Carolina Department of Transportation (NCDOT)
- Federal Highway Administration (FHWA)
- North Carolina State Historic Preservation Office (HPO)
- Other

Reviewed the subject project and agreed on the effects findings listed within the table on the reverse of this signature page.

Signed:

Mary Pope *5/21/2015*
Representative, NCDOT Date

John Burt *5-21-15*
FHWA, for the Division Administrator, or other Federal Agency Date

Renée Beedkill-Early *5.21.15*
Representative, HPO Date

Federal Aid #:MANHF26-1(53)

TIP#: I-2513

County: Buncombe

Property and Status	Alternative	Effect Finding	Reasons
Asheville School (BN1232) NR-Criteria A&C	Section C Alt. A-2	No Adverse Effect with commitments **4(f) <i>de minimis</i>	New ROW required to accommodate cut and fill slope and construct 2 retaining walls. Control of Access fencing will be relocated as needed in these areas. Does not impact contributing resources but requires reconstruction of small section of soil path/driveway near corner of I-40 and Sand Hill Road. No service roads be placed on the property.
	Section C Alt. C-2	No Adverse Effect with commitments **4(f) <i>de minimis</i>	New ROW required to accommodate cut and fill slope and construct 2 retaining walls. Control of Access fencing will be relocated as needed in these areas. Does not impact contributing resources but requires reconstruction of small section of soil path/driveway near corner of I-40 and Sand Hill Road. No service roads be placed on the property.
	Section C Alt. D-1	No Adverse Effect with commitments **4(f) <i>de minimis</i>	New ROW required to accommodate cut and fill slope and construct 2 retaining walls. Control of Access fencing will be relocated as needed in these areas. Does not impact contributing resources but requires reconstruction of small section of soil path/driveway near corner of I-40 and Sand Hill Road. No service roads be placed on the property.
	Section C Alt. F-1	No Adverse Effect with commitments **4(f) <i>de minimis</i>	New ROW required to accommodate cut and fill slope and construct 1 retaining wall. Control of Access fencing will be relocated as needed in these areas. Does not impact contributing resources but requires reconstruction of small section of soil path/driveway near corner of I-40 and Sand Hill Road. No service roads be placed on the property.
Biltmore Estate (BN0004) NR-Criteria A,B,C National Historic Landmark	Section C Alt. A-2	No Adverse Effect **4(f) <i>de minimis</i>	Small section (less than 1 acre) of new ROW required on north side of I-40 to accommodate cut and fill slopes and the Control of Access fencing will be relocated as needed in these areas. Requires minimal tree removal along interstate. Does not impact contributing resources
	Section C Alt. C-2	No Adverse Effect **4(f) <i>de minimis</i>	Larger section (about 2 acres) of new ROW required on north side of I-40 to accommodate cut and fill slopes and the Control of Access fencing will be relocated as needed in these areas. Requires minimal tree removal along interstate. Does not impact contributing resources.
	Section C Alt. D-1	No Adverse Effect	No construction work or temporary construction easements outside the existing APE.

	Section C Alt. F-1	No Adverse Effect	No construction work or temporary construction easements outside the existing APE.
Buncombe County Bridge 216 (BN2471) DE-Criterion C	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.
Calvary Baptist Church (BN4921) DE-Criterion C	Section A	No Effect	No construction work within property boundary. Church parking and access are unaffected.
Baker Building (formerly Friendly Grocery Store) (BN2200) DE-Criteria A&C	Section A	No Adverse Effect	No construction work within property boundary. Sidewalks on sides of building will be reconstructed, as needed. On-street parking spaces in front of structure (Haywood Road) will be eliminated, but access to parking behind building remains unchanged.
West Asheville/Aycock School HD and Expansion (BN1839 and BN5951) NR-Criteria A&C	Section A	Adverse Effect **4(f) Noise, visual, parking	Small portion (less than 1/2 acres) ROW required at Aycock School parking lot to accommodate cut and fill slope and construct retaining wall. Two-way ramp will be eliminated and screening trees will be removed along west side of classrooms. Some parking spaces may be lost at school and along Haywood Road. The trees and Arrowhead monument on school grounds will be protected during construction. Traffic noise analysis indicates that a noise wall could reduce levels at school, but would be a visual impact to school.
William Worley House (formerly C.G. Worley House) (BN2442) DE-Criterion C	Section B Alt. 3	No Adverse Effect with commitments **4(f) de minimis	New ROW required to accommodate a long retaining wall which necessitates a permanent underground easement. Control of Access fencing will be relocated as needed. Clearing will only be required within the ROW limits. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation.
	Section B Alt. 3C	No Adverse Effect with commitments **4(f) de minimis	New ROW required to accommodate a long retaining wall which necessitates a permanent underground easement. Control of Access fencing will be relocated as needed. Clearing will only be required within the ROW limits. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation.

	Section B Alt. 4	No Adverse Effect with commitments **4(f) de minimis	New ROW required to accommodate a long retaining wall which necessitates a permanent underground easement. Control of Access fencing will be relocated as needed. Clearing will only be required within the ROW limits. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation.
	Section B Alt. 4B	No Adverse Effect with commitments **4(f) de minimis	New ROW required to accommodate a long retaining wall which necessitates a permanent underground easement. Control of Access fencing will be relocated as needed. Clearing will only be required within the ROW limits. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation.
Freeman House (BN2470) DE-Criterion C	Section B Alt. 3	No Adverse Effect with commitments	No construction work or temporary construction easements will impact the property; however the new facility will be constructed at approximately the same elevation as the house and at an approximate distance of 156' from the structure. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation. NCDOT will also speak with the property owners about the visual impacts of the new facility and discuss landscaping measures.
	Section B Alt. 3C	No Adverse Effect with commitments	No construction work or temporary construction easements will impact the property; however the new facility will be constructed at approximately 20' lower than the elevation of the house and at an approximate distance of 40' from the structure. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation. NCDOT will also speak with the property owners about the visual impacts of the new facility and discuss landscaping measures.
	Section B Alt. 4	No Adverse Effect with commitments	No construction work or temporary construction easements will impact the property; however the new facility will be constructed at approximately 24' lower than the elevation of the house and at an approximate distance of 67' from the structure. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation. NCDOT will also speak with the property owners about the visual impacts of the new facility and discuss landscaping measures.

	Section B Alt. 4B	No Adverse Effect with commitments	No construction work or temporary construction easements will impact the property; however the new facility will be constructed at approximately 30' lower than the elevation of the house and at an approximate distance of 159' from the structure. Traffic noise analysis indicates that a noise wall could reduce levels at the house and NCDOT will contact the property owners to discuss abatement measures such as a noise wall, storm windows, or insulation. NCDOT will also speak with the property owners about the visual impacts of the new facility and discuss landscaping measures.
Buncombe County Bridge 323 (formerly Great Smoky Mtn. Bridge) (BN2469) DE-Criterion C	Section B Alts. 3, 3C, 4, & 4B	No Effect	No construction work or temporary construction easements will impact the structure.
Southern RR Bridge (BN5928) DE-Criteria A&C	Section B Alts. 3, 3C, 4, & 4B	No Effect	No construction work or temporary construction easements will impact the structure.
Montford Area HD (BN0022) NR-Criteria A&C Local Landmark HD	Section B Alt. 3	No Effect	No construction work or temporary construction easements will impact the district.
	Section B Alt. 3C	No Effect	No construction work or temporary construction easements will impact the district.
	Section B Alt. 4	No Adverse Effect	No construction work or temporary construction easements will impact the district, but a retaining wall approximately 230' long will be constructed along the western boundary.
	Section B Alt. 4B	Adverse Effect Visual	No construction work or temporary construction easements will impact the district; however two elevated bridges and a retaining wall approximately 687' long along the western boundary will have visual impacts on the district.
Montford Hills HD (BN1152) DE-Criteria A&C	Section B Alt. 3	No Effect	No construction work or temporary construction easements will impact the district.

	Section B Alt. 3C	No Effect	No construction work or temporary construction easements will impact the district.
	Section B Alt. 4	No Effect	No construction work or temporary construction easements will impact the district.
	Section B Alt. 4B	No Adverse Effect **4(f) <i>de minimis</i>	Permanent underground easement required to accommodate a long retaining wall adjacent to Westover Drive
Montford Hills & Hibritren Dr. Expansion (BN2468) DE-Criteria A&C	Section B Alt. 3	No Adverse Effect **4(f) <i>de minimis</i>	Small section (approximately 0.03acres) of new ROW required to accommodate cut and fill slopes and the Control of Access fencing will be relocated as needed in these areas. Requires minimal tree removal. Does not impact contributing resources.
	Section B Alt. 3C	No Adverse Effect **4(f) <i>de minimis</i>	Small section (approximately 0.04acres) of new ROW required to accommodate cut and fill slopes and the Control of Access fencing will be relocated as needed in these areas. Requires minimal tree removal. Does not impact contributing resources.
	Section B Alt. 4	No Adverse Effect with commitments **4(f) <i>de minimis</i>	Approximately 0.16 acres of new ROW required to construct and maintain retaining wall along western boundary. NCDOT will place the Control of Access fencing no more than 15' from the retaining wall to reduce permanent easements and tree clearing.
	Section B Alt. 4B	No Effect	No construction work or temporary construction easements will impact the district.
Mrs. Minnie Alexander Cottage (BN0195) NR-Criterion C	Section B Alts. 3, 3C, 4, & 4B	No Effect	No construction work or temporary construction easements will impact the house.
Whiteford G. Smith House (BN1829) NR-Criterion C	Section B Alts. 3, 3C, 4, & 4B	No Effect	No construction work or temporary construction easements will impact the house.

Haywood Street United Methodist Church (BN2212) DE-Criterion C	Section B Alts. 3, 3C, 4, & 4B	No Effect	No construction work or temporary construction easements will impact the church or its parking.
--	-----------------------------------	-----------	---

Initialed: NCDOT MPA FHWA DJB HPO Rgg

FHWA Intends to use the HPO's concurrence as a basis for a "de minimis" finding for the following properties, pursuant to Section 4(f):

1. Asheville School (BN1232)
2. Biltmore Estate (BN0004)
3. William Worley House (formerly C.G. Worley House) (BN2442)
4. Montford Hills HD (BN1152)
5. Montford Hills & Hibritren Dr. Expansion (BN2468)