

# 2025 Section 106/ER Workshop

Hosted by the  
North Carolina  
Historic Preservation Office  
&  
Office of State Archaeology



# Welcome!

With

Chris Southerly, State Archaeologist

&

Renee Gledhill-Earley, Environmental Review Coordinator



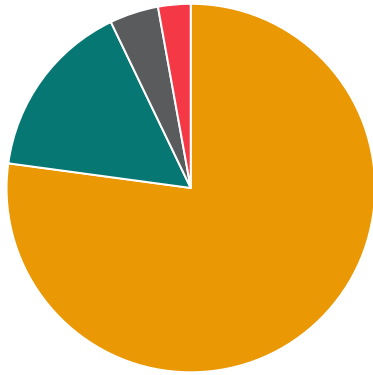
Please hold your questions until the end of the presentation. If you happen to think of any after we have concluded, you are welcome to bring them up during the panel discussion.

*Photo - A Map of North Carolina c. 1832, By A. Finley, Young & Delleker, SC*  
(<https://dc.lib.unc.edu/cdm/singleitem/collection/ncmaps/id/623/rec/38>)

# ER Branch Project Updates

Digitizing the Report Library

## ER Digitization Project



■ Already digitized ■ Needs scanning ■ Missing letters ■ Missing reports



- Project started in 2018
  - "Baton was passed" in 2024
- 1400 Historic Structure Survey Reports total in Library
- 320 needed digitization
  - 220: simple scanning
  - 60: missing Determination of Eligibility letters
  - 40: completely missing

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As the archivist of SHPO, I not only help my team with processing incoming reports (all the records are spick and span)

Main goal: Broaden access

Why? The reports you send to us aren't just analytical data,  
it's our cultural heritage. Y'all are creating a historical record

## Challenges to the digitization process

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- Screening of confidential data
- Varying records retention policies
  - Department of Transportation, Federal Highway Administration
- Convoluted organization of prior reports
- Differing procedures for each kind of record
  - Maps, photos, bound copies, etc...
  - Large-format scanner, Zeutschel scanner
- Miscellaneous older reports not being added to ER Library



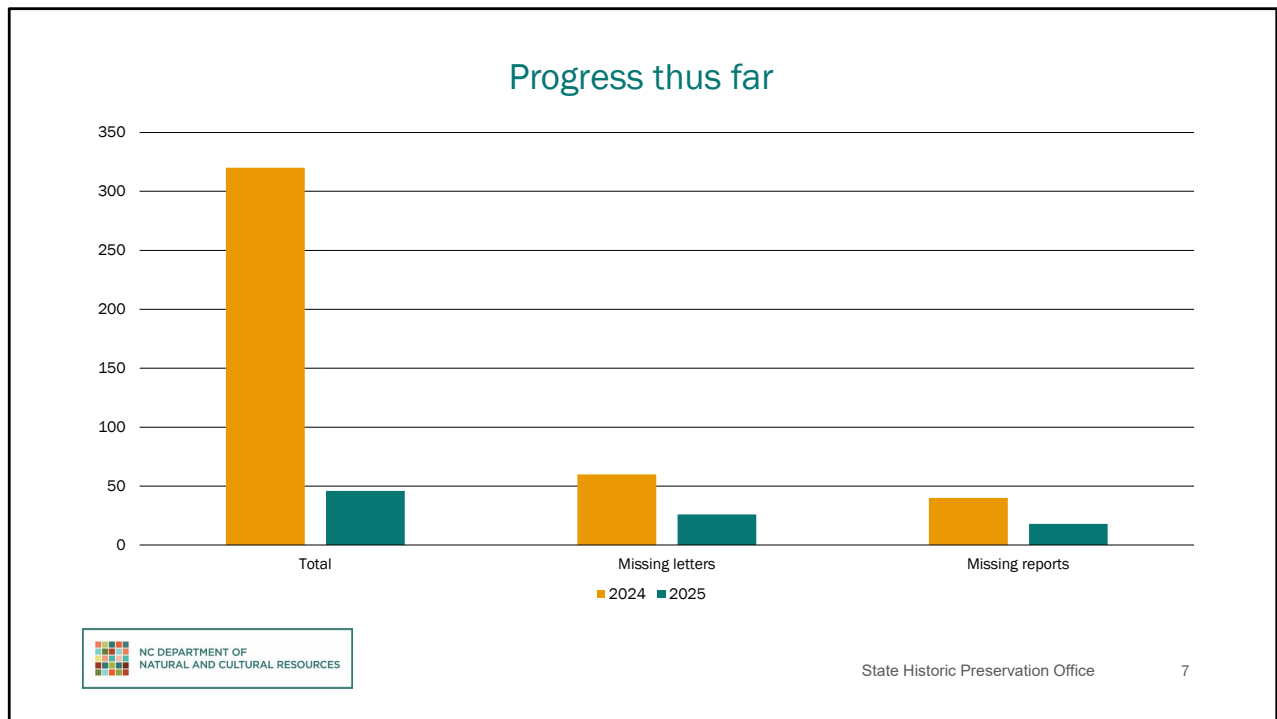
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2021: US 19 project near Bryson City) Kituwah in Swain County, location/pin information redacted

Inactive records are discarded depending on the organization

Complicated because older reports (ancient history) only have 2-4 copies in existence. To SHPO, they have permanent value due to research potential  
Dogwood Inn in Rutherford County (Beth from survey), DOE in 1994



Total: From 320 to 44

Missing DOE letters: From 60 to 26

Missing: From 40 to 18

The 26 reports with Missing DOE letters are already digitized.

# ER Branch Project Updates

Moving to Laserfiche



## Laserfiche® Development and Implementation

Process began 2021 to transition our system from Microsoft Access Database to dynamic platform  
Platform developed to maintain Office of State Archaeology's Site Forms and Environmental Review data-bases

The process, from scope of work to completed database, took four years. Completed May 2024.

### Pros

- Every reviewer has a task list with the due date listed
- We can assign priority levels

### Cons

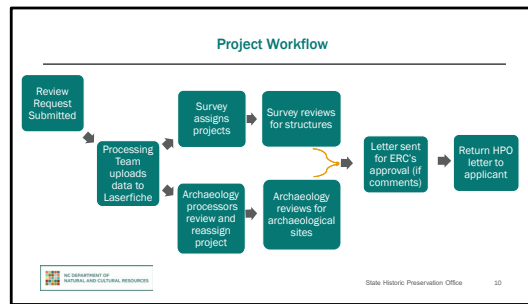
- Not much easier to relocate projects/information
- Compiling data takes just as long as before



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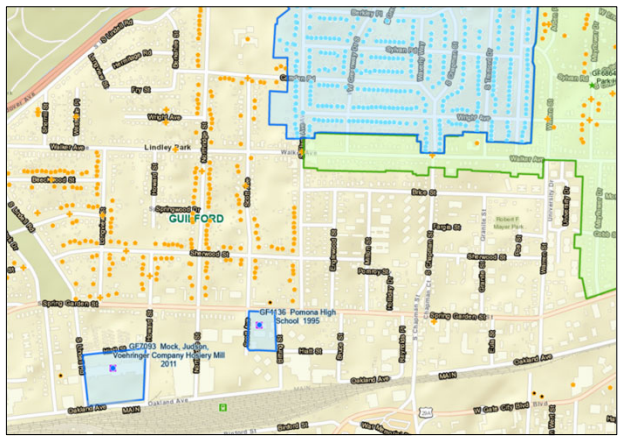
A year after I started in this position, we began the transition from a Microsoft Access database and spreadsheet based notification system to a dynamic database. Our office landed on Laserfiche, a program administered through MCCi. Overall, the process from start to finish took three years. We developed the scope of work, lead the team on developing the database, and implemented the changes. We are still in the process of cleaning up the data to this day while also making sure that all aspects of the environmental review process are tended to. [READ PROS AND CONS] Otherwise, everything is about the same. Ideally, we would also have a submission portal for everyone to submit their projects through, but funding cuts and the costs to maintain the form preclude implementation.



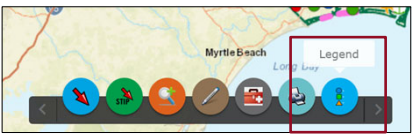
The introduction of laserfiche has not substantially changed our workflow. The review request is submitted and logged in by my team. The archaeology processors double check the submission and pass it along to the archaeology reviewers. Then, survey and archaeology concurrently review the projects. If there are any specific comments, Renee reviews the letter and approves the language. Finally, the completed letter is returned.

## HPO WEB and GIS

# HPOWEB/GIS



NC DEPARTMENT OF  
NATURAL AND CULTURAL RESOURCES



(2 of 3)

<b>CH0841   Harland Creek Bridge (DOE: 2005)</b>	
Site ID	CH0841
Status	DOE
Site Name	Harland Creek Bridge
Description	1921 reinforced concrete thru girder bridge (DOT 18043)
Notes	Crit C; ER 01-7132; Multi Co Rpt #257
Internal	
Year SL	
Year DOE	2005
Year Designated	
Journal Chapter	None
<a href="#">Zoom to</a>	...

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## HPOWEB/GIS

### The Basics

- Maps and Data available online on HPOWEB + Our Website
  - Link: <https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>
- Includes basic glossary of terms, i.e. SO, SL, DOE, NR, etc.
- Resource type have a specific color and shapes
- HPOWEB does **NOT** include archaeological sites



Home > Survey and National Register > GIS Maps and Data

### GIS Maps and Data

While the North Carolina State Historic Preservation office GIS program is officially housed within the Survey & National Register Branch, the GIS team functionally supports all the geographic needs of the HPO and, by extension, architectural historians, consultants, researchers, and the general public, through:

- the creation of authoritative map data (historic resource locations and boundaries, historic rehabilitation tax credit project locations, environmental review project boundaries, certified local government jurisdictions, grant project locations, historic covenants and easements, and more)

#### Designated Historic resources and Historic District boundaries (with center points)

- ★ National Register
  - ★ Study List
  - ▲ ★ Determined Eligible
  - ▲ ★ Study List & Determined Eligible
  - ★ Local Landmark / District
- Historic resources within NRHDs**
- + Surveyed Only and Blockface (multiple resources)
- Historic resources outside NRHDs**
- + Surveyed Only and Blockface (multiple resources)
  - ★ Surveyed Area center point (boundary not displayed)
- A black dot inside any symbol indicates the resource is gone

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<https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>

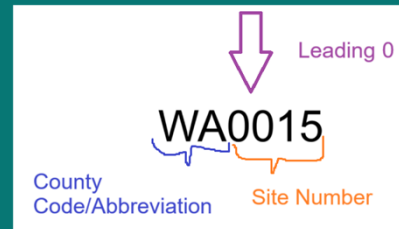
## HPOWEB/GIS

### The Basics

- HPOWEB displays non-archaeological recorded properties and historic properties (36 CFR 800.16(l))
- If it has a **Survey Site Number (SSN)**, there is a file and database record at SHPO. What is in the file varies greatly.
- A property screened by SHPO does not get an SSN by default
- Gone properties are confirmed completely gone with no above-ground remnants



### Anatomy of an SSN



### Anatomy of an Archaeological Site Number



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## HPOWEB/GIS

- Surveyed Only (SO; Tan Color; Pentagon)
  - A surveyed property is NOT a historic property (36 CFR 800.16(l))
  - Surveyed properties simply means there is a file at SHPO
    - Files may include full database entries with photos, plan drawings/sketches or as little as a newspaper clipping or handwritten notes
  - Notes field in **HPOWEB** will indicate if an evaluation or other event has occurred
  - Surveyed Only properties in Historic Districts may be contributing properties, check Notes or the NR nomination!



### Surveyed

Surveyed individual resources & centerpoints

Status, LocalStat, HDstatus

- Surveyed Only
- Surveyed in NRHD
- Surveyed Only, Gone
- Surveyed in NRHD, Gone
- ✚ Blockface- Multiple properties
- ✚ Blockface in NRHD
- ★ Surveyed Area, No designation
- ★ Surveyed Area in NHRD



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## HPOWER/GIS

- **Determined Eligible (DOE; Orange Color; Triangle)**
  - SHPO has determined a property eligible for listing in the NRHP (36 CFR 800.16(l))
- **Study Listed (SL; Green Color, Square)**
  - Potentially eligible
  - Codified in state administrative code
  - Reviewed by National Register Advisory Committee (NRAC).
  - No mechanism to remove a property from the SL, check GIS notes for more info if any available
  - Not formally a part of ER review
- **For Section 106 purposes, DOE and SL properties are historic properties**



### Determined Eligible

#### DOE individual resources & centerpoints

##### Status, LocalStat, HDstatus

- ▲ Determined Eligible
- ▲ DOE, Gone
- ▲ SL and DOE
- ▲ SL and DOE, Gone
- ★ DOEHD Center Point
- ★ SLDOEHD Center Point

#### WA0328 | Yeargan House (DOE: 2014)

Site Name	Yeargan House
Quad Name	Garner
Description	c. 1900 1 1/2-story Triple A frame house w/ hip roof front po
Status	DOE
Site ID	WA0328
Notes	Crit C; CH 98-0457; WA Co Rpt #540

### Study List

#### SL individual resources & centerpoints

##### Status, LocalStat, HDstatus

- SL Individual Entry
- ▲ SL and DOE entry
- Study List Entry, Gone
- ▲ SL and DOE, Gone
- ★ SLHD Center Point
- ★ SLDOEHD Center Point

(1 of 2)	
JT0902   Penny-Atkinson Farm (Gone) (SL: 1983)	
Site ID	JT0902
Status	SLD
Site Name	Penny-Atkinson Farm (Gone)
Description	c. 1870 frame farmhouse
Notes	New development at site

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DOE is usually the result of a DOE request on a property, or as a result of a requested HSSR as part of Environmental Review.



## HPOWER/GIS

- National Register-listed Properties (NR, Blue Color, Circle)
  - Full NR Nomination form
  - Reviewed by NRAC
  - Forwarded to the Keeper
  - Eligible for grants, tax credits, etc.
- Surveyed Only properties in Historic Districts may be contributing properties, check the NR nomination!



### National Register

NR individual resources & centerpoints

Status, LocalStat, HDstatus

- NR Individual Listing
- NR Listing, Gone
- ★ NRHD Center Point

2 of 5)

#### WA5104 | Meadowbrook Country Club (NR: 2009)

Site ID	WA5104
Status	NR
Site Name	Meadowbrook Country Club
Description	1961-1970 African American golf course, country club
Notes	Crit A; CH 98-0457; WA Co Rpt #540.1; R-2721

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## HPOWEB/GIS

- Locally Listed (LL; Purple Color; Large Square)
  - Certified Local Government Program
  - Locally Listed by themselves are not historic properties for Section 106 compliance
  - How they are involved with Section 106 discussed towards the end of session



### Local Landmarks and Districts

Local individual resources & centerpoints

LocalStat

- Local Landmark
- Local Landmark, Gone
- ★ Local HD Center Point

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## Submissions & Review

## How is ER/Section 106 Different in NC

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- Projects may be submitted for review in anticipation of Section 106 compliance, "Due Diligence"
- Anyone can initiate project review, SOI-qualified individuals not required
- Background research for archaeological sites is not required for initial project review initiation
- SHPO and OSA screens the project area and determines if an historic structures survey and/or archaeological survey is required
- Assessment of Effects not required unless you're a Federal Agency
- State-funded projects are reviewed under G.S. 121-12(a) and only need to consider effects on already listed National Register of Historic Places historic properties.





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See Slide - Verbatim

## Environmental Review Submissions and Processing

- Check out the project review checklist! 99% of your questions are answered there!  
[www.hpo.nc.gov](http://www.hpo.nc.gov)
- Submit all projects to [environmental.review@dncr.nc.gov](mailto:environmental.review@dncr.nc.gov)
  - Submitting to reviewers, Renee Gledhill-Earley, Ramona Bartos, or Dr. Darin Waters  WILL CAUSE DELAYS! 

### By US Postal Service:

Environmental Review  
State Historic Preservation Office  
4617 Mail Service Center  
Raleigh, NC 27699-4617

### By FedEx, UPS, or courier:

Environmental Review  
State Historic Preservation Office  
109 East Jones Street, Room 255  
Raleigh, NC 27601

Faxed submittals will **not** be accepted.



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I just want to give a quick overview of the ER submission process and expectations. First off, please be sure to check out our project checklist on our website. We do not believe anything is optional within the checklist and we will turn around projects if we do not have the requested information. I will discuss that later in this presentation. All projects should be submitted to our environmental review email inbox at [environmental.review@dncr.nc.gov](mailto:environmental.review@dncr.nc.gov). If you are submitting project materials via the regular mail, please make sure you address Renee Gledhill-Earley. Sending projects to reviewers, Renee Gledhill-Earley, Ramona Bartos or Dr. Darin Waters will cause delays as they have to turn around and route the projects back to me. We outline the submittal process in our checklist and all of our letters.

## Reasons why submissions are rejected before review begins

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- Poor maps/maps missing on original submissions
  - Maps showing the APE in conjunction with parcel data preferred
- Not providing the acreage of the Area of Potential Effects (APE)
- Not providing the applicant contact information (Name, company, email)
- Listing potential funding/permitting or if it is due diligence.
- Missing deliverables for Historic Structure Survey Reports (HSSRs) and Archaeological Survey Reports
  - Specifics covered in Session 3



I also wanted to outline the reasons why submissions are rejected. Until we receive all required information, we do not start the 30 calendar-day review period. Our top rejection reasons are.... [read the things].

## How to Interpret SHPO Letters

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- What does the no comment letter language mean?

**"We have conducted a review of the project and are aware of no historic resources which would be affected by the project. Therefore, we have no comment on the project as proposed."**

- Accounts for architectural and archaeological resources (SHPO + OSA comments)
  - No further work
  - If a historic property or recorded property is within the APE or adjacent, the project will have No Effect on them
- Request for Information (RFI), survey requests, evaluations, No Adverse Effect, Adverse Effect will not use the "No Comment" language above.



## Section 106 Odds and Ends



## FCC Submissions

### Two forms for cell tower submission



Updated this week!



#### Communications Tower Information Form

- New cell towers, co-locations, and single small-cell poles
- FCC 620/621 form is not required
- Do not need to identify archaeological sites on the form
- No archaeological surveys needed unless requested by OSA
  - All archaeological surveys need to be submitted through OSA ShareFile

#### Small-Cell Batch Form

- Small-cell poles under 50' in height
- Poles within 1 square mile
  - Can exceed distance if requested before submission



Forms Link: <https://www.hpo.nc.gov/environmental-review/environmental-review-project-submittal/forms-guidance-and-toolkits>

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Use the most recent form! We just updated them this week!

<https://www.hpo.nc.gov/environmental-review/environmental-review-project-submittal/forms-guidance-and-toolkits>

## Solar Farms and FERC Form 556

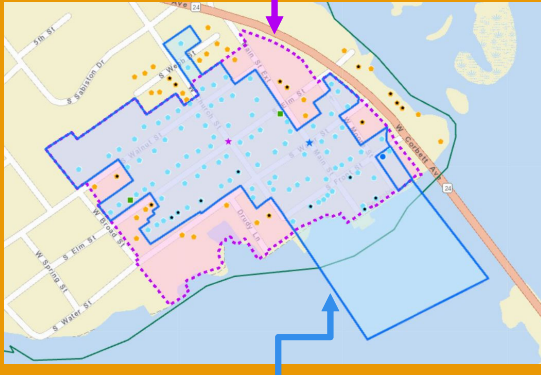
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Per Advisory Council on Historic Preservation comments, Federal Energy Regulatory Commission (FERC) Form 556 is not an undertaking.

- Solar farms typically fall under Qualifying small power production facilities (QF;  $\leq 80$  MW), which uses for FERC Form 556
- FERC Form 556 is self-certifying and therefore FERC **does not take any discretionary action**
- Projects that come through the SCH typically only identify FERC Form 556 and other state permits and therefore fall under State Review: G.S. 121-12(a).
- The size of solar farms often require ACOE permit which then triggers Section 106 and the APE may be smaller than the overall solar farm footprint



### Locally Designated Historic District (LHD)



### National Register-listed Historic District (NRHD)



## Working with CLGs & HPCs

- Project is within LHD or is individually landmarked and there are Historic Properties
  - SHPO will note in our letter that the designation exists, encourage the applicant to reach out for COA requirements and provide contact information for the local commission
  - Local commission POC will be copied on the letter
- What if the locally designated property is not considered historic by the NC SHPO?
  - SHPO will determine that there are “No Historic Properties Affected” but will still provide the information above.
- Minimizing or Resolving Adverse Effects
  - SHPO will often defer to the preferences of the local community and commission for strategies to minimize or resolve effects

## Disaster Recovery

- Prioritized and Expedited review
- Recovery reviews can add 1-2k reviews/yr
- Who submits? Mostly federal or state agencies but the type of emergency may result in different funding paths & review requirements. Ex. COVID-19 > ARPA
- NC disaster-specific PA with FEMA since 2020
- Working to execute statewide PA to cover all disasters as they occur; Goal is Summer 2025.
- New PA would allow other agencies, like DHUD, to use the PA's outlined processes to complete their Section 106 reviews.



Helene Flooding levels at Biltmore gate,  
Photo by Matt Henson, 2024

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## Tropic Storm Helene Recovery

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Chimney Rock, Rutherford County, NC pre and post Helene. Imagery from the [NOAA Hurricane Helene Before and After Viewer](#)



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## Tropical Storm Helene Recovery

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- NCDEQ Division of Waste Management Temporary Debris and Reduction Sites
  - 186 sites reviewed to date
- Transportation Projects
  - I-40, temporary bridges, bridge inspections, 90%+ roads reopened, 200+ bridges + 800+ culverts repaired, most Section 106 review will be covered under our PA with USACE, NCDOT, and FHWA
- NPS and Blue Ridge Parkway
  - Linville Falls building, historic property/contributing resources losses
  - 157 out of 252 miles of road open (60%+)
- FEMA
  - 200+ acquisitions or elevations



## Section 106 and FHWA Section 4(f)


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- Section 4(f) a part of USDOT Act of 1966
  - Section 4(f) applies to projects that receive funding from or require approval by an agency of the U.S. DOT.
  - Implemented by FHWA and FTA– [https://www.environment.fhwa.dot.gov/env\\_topics/4f\\_tutorial/](https://www.environment.fhwa.dot.gov/env_topics/4f_tutorial/)
- FHWA must determine that there is **no feasible and prudent alternative that avoids the Section 4(f) properties** and that the project **includes all possible planning to minimize harm** to the **Section 4(f) properties** (Adverse Effect); or FHWA makes a finding that the project has a *de minimis* impact on the Section 4(f) property (No Adverse Effect/No Effect)
  - **Section 4(f) Properties:** Parks, Recreation Areas, Refuges, Historic Sites, + Others
- Transportation projects are typically covered under SHPO's PA with FHWA, NCDOT, and ACOE.
- Locally Administered Projects (LAP) go through the normal Section 106 review



## Section 106 and FHWA Section 4(f)

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- If the project is a LAP, we recommend you follow the NCDOT guide for LAP projects
  - LINK: [https://connect.ncdot.gov/municipalities/Funding/Documents/LAP%20Guidance\\_1.25.2022.pdf](https://connect.ncdot.gov/municipalities/Funding/Documents/LAP%20Guidance_1.25.2022.pdf)
- Initiate project review with SHPO
  - Determine if survey or evaluation is required
  - Determine effects
  - No comment/No effect  Section 106 complete
- What Next if Adverse Effect or Potential Adverse Effect?
  - Contact NCDOT Project Manager who will contact FHWA
  - FHWA Effects Assessment/Consultation with SHPO





## IMPORTANT LINKS

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- ER Project Review Checklist: <https://www.hpo.nc.gov/environmental-review/environmental-review-project-submittal/project-review-checklist>
- HPOWEB and GIS Data: <https://www.hpo.nc.gov/survey-and-national-register/gis-maps-and-data>
- FHWA Section 4(f) and Section 106 Toolkit: [https://www.environment.fhwa.dot.gov/env\\_topics/4f\\_tutorial/](https://www.environment.fhwa.dot.gov/env_topics/4f_tutorial/)
- NCDOT LAP  
Procedure: [https://connect.ncdot.gov/municipalities/Funding/Documents/LAP%20Guidance\\_1.25.2022.pdf](https://connect.ncdot.gov/municipalities/Funding/Documents/LAP%20Guidance_1.25.2022.pdf)
- SESSION 1 Youtube Video LINK: [https://youtu.be/DxX18xKw1-4?si=Mr7aaA0l48\\_nyJ9N&t=1](https://youtu.be/DxX18xKw1-4?si=Mr7aaA0l48_nyJ9N&t=1)



# Questions?

## With Team ER & OSA

### Questions Received:

- **Viewshed/APE Boundaries for Transmission Lines**
  - See minute mark [47:42](#) of the recorded video for more information.

Session 1 is Concluded

Take a 15 minute break!



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