



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

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary Susi H. Hamilton

Office of Archives and History
Deputy Secretary Kevin Cherry

November 1, 2019

William Green
Terracon Consultants, Inc.
521 Clemson Road
Columbia, South Carolina 29229

Bill.Green@terracon.com

Re: Wetland Impacts for Publix Distribution Center, Burlington Road & US 70, Greensboro, Guilford County, ER 19-0930

Dear Mr. Green:

Thank you for your letter of September 6, 2019, transmitting the draft report, "Architectural Description of Structure GF9125 at the Birch Creek Road Site, Guilford County, North Carolina". We apologize for the delayed response and offer the following comments based on our review of the report.

The architectural survey report lacks the information necessary to properly evaluate the tobacco barn's eligibility for listing on the National Register of Historic Places (NRHP). However, due to the barn's potential relocation, as well as the lack of any associated farmhouse or outbuildings, we believe the barn does not retain sufficient integrity of feeling, setting, and association to meet the required criteria for listing.

Given that no historic structures or archaeological sites will be affected by the proposed project, we do not object to the project moving forward. However, as outlined below there are several revisions needed for the historic structures survey report about the barn.

- The report must discuss 2-3 comparable properties to ensure enough architectural context at the local and county level is present for adequate assessment.
- A boundary must also be included for any property recommended as eligible for the NRHP.

While the permitting agencies should have enough information from us to make a decision, we consider consultation with our office incomplete until we receive the revised/corrected historic structures survey report, survey database, and survey site form. We are also looking forward to receipt of the revised archaeological survey report per our letter of October 21, 2019.

We strongly recommend that your consultants review our *Historic Structure Survey Report Standards* page for more information on deliverable requirements (<https://www.ncdcr.gov/about/history/division-historical-resources/nc-state-historic-preservation-office/environmental-0>). Please direct any questions you may have about submittal of the revised report to Katie Harville, Environmental Review Specialist, at katie.harville@ncdcr.gov.

These comments are offered in accordance with Section 106 of the National Historic Preservation Act and the regulations of the Advisory Council on Historic Preservation at 36 CRF 800. Should you have any questions, please contact me at 919-814-6579 or renee.gledhill-earley@ncdcr.gov

Sincerely,



Renee Gledhill-Earley
Environmental Review Coordinator

cc David Bailey, USACE

David.E.Bailey2@usace.army.mil

ARCHITECTURAL DESCRIPTION OF STRUCTURE GF9125 AT
THE BIRCH CREEK ROAD SITE
GUILFORD COUNTY, NORTH CAROLINA

SHPO Review No. ER 19-0930

Lead Federal Agency
U.S. Army Corps of Engineers, Wilmington District
Permit No. SAW 2018-00240

Prepared For:

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Prepared By:

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Project No. 73197117

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William Green, M.A., RPA # 10387
Principal Investigator

September 2019

1.0 INTRODUCTION

Terracon Consultants, Inc. (Terracon), on behalf of Publix Super Markets, Inc. (Client), completed a Phase I Archaeological Survey of approximately 340 acres at the proposed Birch Creek Road Site in Guilford County, North Carolina (Figures 1 and 2). The purpose of the survey was to identify and evaluate archaeological and aboveground historic resources that could be eligible for inclusion in the National Register of Historic Places (NRHP). The project is being done for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) (54 U.S.C. § 300101 et seq.). The U.S. Army Corps of Engineers, Wilmington District (USACE), is the lead federal agency for the project (Permit No. SAW 2018-00240). The project was conducted under the terms and conditions of a Master Service Agreement (MSA) between Terracon and Publix Super Market, Inc., dated September 21, 2015, and in general accordance with Proposal No. P73197117 Rev. 2, dated July 1, 2019.

The project is a proposed 340-acre Publix Distribution Center located on both sides of Birch Creek Road, south of Burlington Road in Guilford County, North Carolina. The project area is roughly rectangular in shape and is bounded by Burlington Road to the north, and private property to the east, west, and south (Figure 1). Based on the nature of the undertaking, topography, as well as existing vegetation and land use, the Area of Potential Effects (APE) is considered to be the footprint of the 340-acre project area. In a letter from the North Carolina State Historic Preservation Office (SHPO) to the U.S. Army Corps of Engineers dated March 15, 2019, the SHPO determined that the proposed project would not have an effect any historic structures. Based on this, no architectural survey was conducted; however, one above-ground historic resource was identified within the project area.

This report contains the architectural description and evaluation for Structure GF9125. The results of the archaeological survey and background information are described in a separate report (Sain et al. 2019).

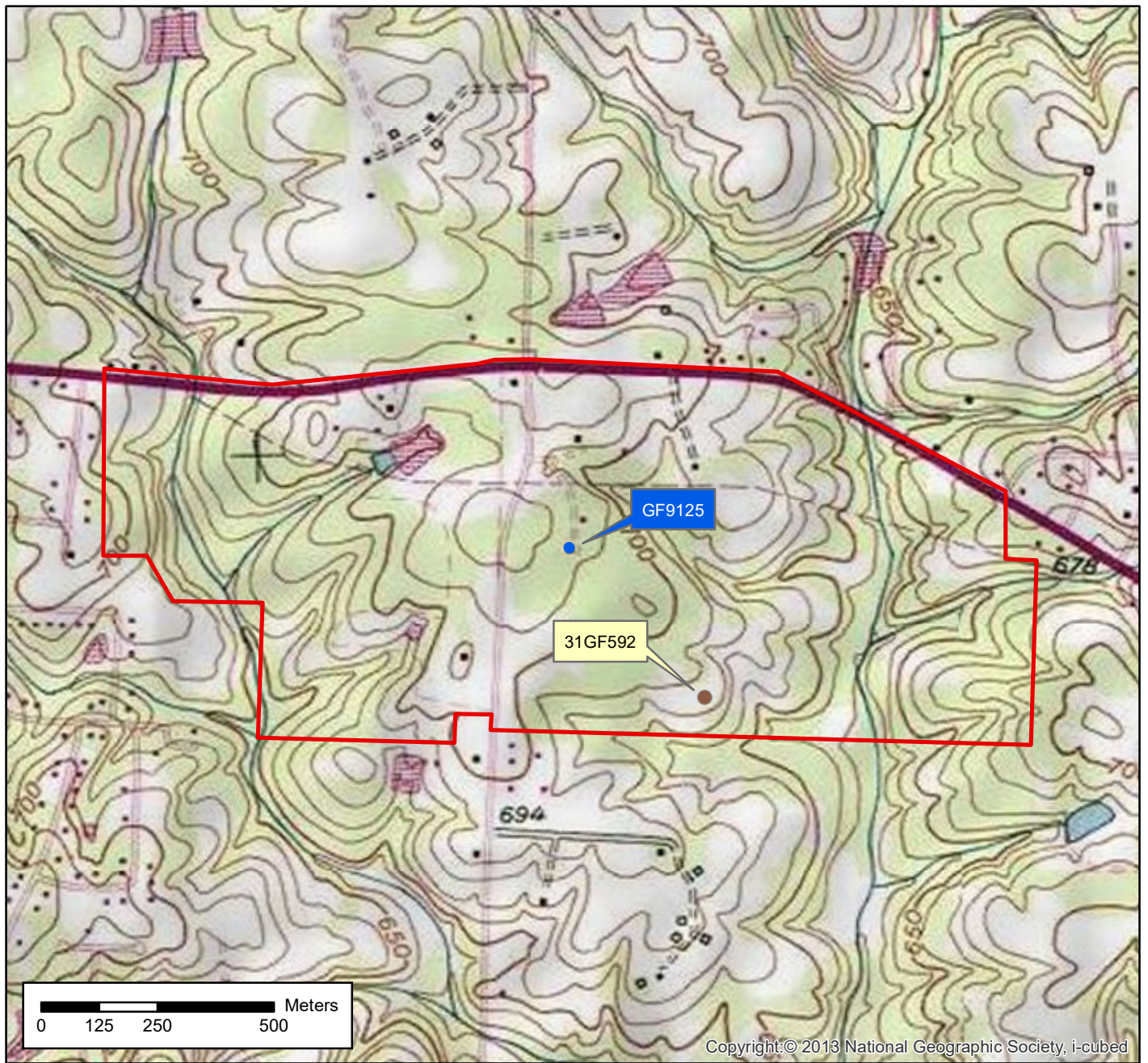
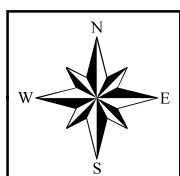
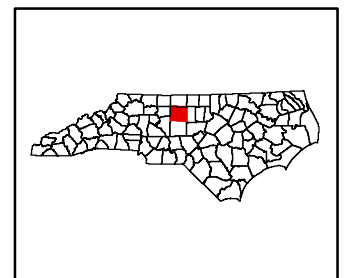
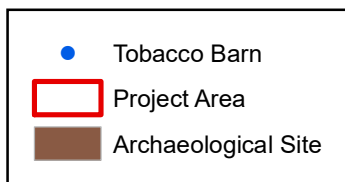


Figure 1. Project location and cultural resources in the project area.
Base Map: McCleansville (1979) 7.5' USGS topographic quadrangle.



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|--------------|-------------|
| Project No. | 73197117 |
| Date: | August 2019 |
| Drawn By: | BGG |
| Reviewed By: | BGG |

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USGS TOPOGRAPHIC MAP

BIRCH CREEK ROAD SITE
GUILFORD CO., NC

Figure

1

Structure GF9125

Birch Creek Road ■ Guilford Co, North Carolina
September 2019 ■ Terracon Project No. 73197117



2.0 STRUCTURE GF9125

Resource No. GF9125 is a ca. 1850s front gabled tobacco barn (Figure 2) located in the western portion of Area B near an unnamed dirt road (Figure 1). The structure has a rectangular plan shape and is constructed from hewn logs joined with half dove tail joints on each corner. A single-entry door is located on the south elevation of the structure and rectangular gable vents are located in both gables. Sheathing material on the gables of the structure consists of clapboard siding. The roof materials on the structure have been replaced with pressed sheet metal roofing with four metal stove pipe chimneys piercing the roof surface. Along the log portion of the structure is deteriorated fabric that was nailed to the structure. An addition was located on the east elevation of the structure that has deteriorated and collapsed but had not damaged the original structure. On the south corner of the west elevation is a small deteriorated section of the structure, consisting of water damage and rot. The interior of the structure consists of a large room with several logs intersecting the space from north to south.

The structure does not appear on the 1952 McCleansville USGS topographic (Figure 3) but does appear as a photorevised structure on the 1968 McCleansville topographic map (see Figure 4). This may indicate that it was moved to its current location sometime 1952 and 1968. Despite this, Terracon recommends that Resource GF9125 is significant under Criterion A for its association with agriculture and tobacco production in Guilford County, and under Criterion C for being an example of early tobacco barn construction.



Figure 2. Resource GF9125.

Structure GF9125

Birch Creek Road ■ Guilford Co, North Carolina

September 2019 ■ Terracon Project No. 73197117

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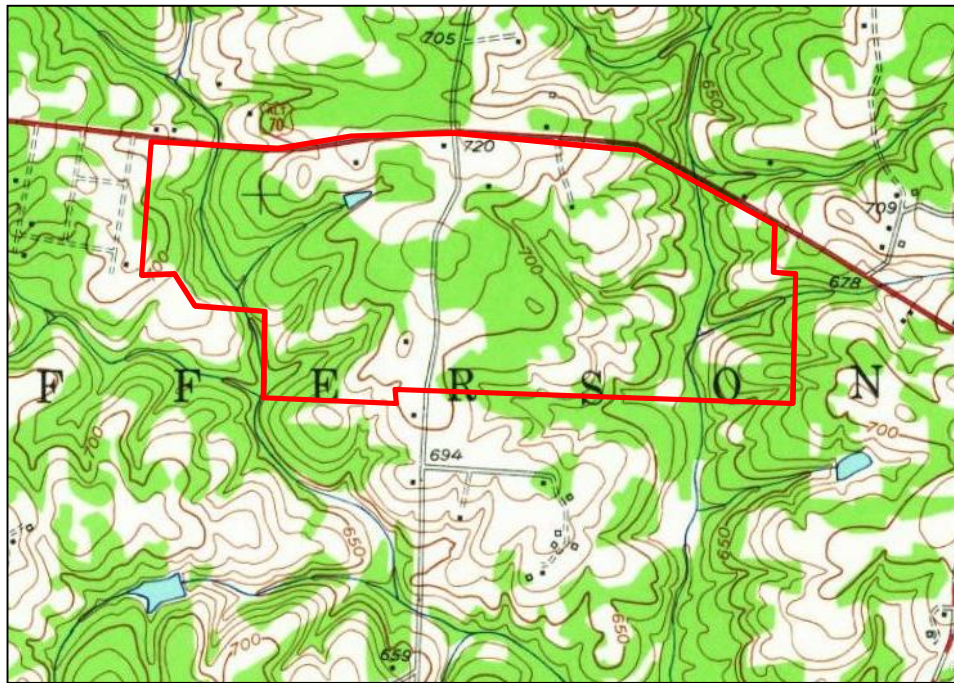


Figure 3. McLeansville (1952) USGS topographic map showing the location of the project area in red.



Figure 4. McLeansville (1968) USGS topographic map showing the location of the project area in red and Structure GF9125 circled in blue.

Structure GF9125

Birch Creek Road ■ Guilford Co, North Carolina

September 2019 ■ Terracon Project No. 73197117



3.0 CONCLUSIONS

Terracon has completed a Phase I Archaeological Survey of approximately 340 acres at the Birch Creek Road Site located approximately 1.5 miles south of McLeansville in Guilford County, North Carolina. As a result of the survey, one archaeological site, 31GF592, and one above-ground resource, GF9125, were identified (Figure 1). Archaeological site 31GF592 is a temporally non-diagnostic prehistoric lithic scatter that contains few artifacts, has no artifact diversity, and is a common site type. Based on these findings the site is recommended as being ineligible for inclusion in the NRHP. Resource GF9125 is a mid-nineteenth century tobacco barn located in the central portion of the project area that is recommended as being eligible for inclusion in the NRHP under Criteria A (Event) and C (Architecture).

Based on the results of the investigations, the proposed undertaking could have an adverse effect on Resource GF9125. Therefore, we recommend that the USACE and Publix Supermarkets, Inc., begin consultation with the SHPO and other consulting parties on ways to avoid, minimize, or mitigate the potential adverse effects on this resource. No additional archaeological investigations are recommended for the remaining portions of the 340-acre Birch Creek Road project area.