

Appendix N.1: Agency Correspondences

Durham-Orange Light Rail Transit Project



July 2015



CIN 120217

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

Ramona M. Bartos, Administrator

Governor Pat McCrory
Secretary Susan Kluttz

Office of Archives and History
Deputy Secretary Kevin Cherry

October 10, 2013

Juanita Swink
Triangle Transit
PO Box 13787
Research Triangle Park, NC 27709

Re: Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0738

Dear Ms. Swink:

Thank you for your email of September 19, 2013, transmitting the minutes resulting from the meeting and webinar of August 27, 2013, concerning the above project.

As noted during the meeting, staff of the Office of State Archaeology have reviewed the Environmental Methodology Report and concur that it is appropriate for the project. We look forward to working with your consultants, URS Corporation, on this project and sharing information with them. As also noted during the meeting, archaeological site location information is sensitive and is protected pursuant to NC General Statute 70-18. Archaeological site locations are not to be made available to the public nor included in documents available to the public due to the risk of harm to the resources.

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

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

Sincerely,

Renee Gledhill-Earley

for Ramona M. Bartos

Please note, the correct mailing address for environmental review projects is:

**Renee Gledhill-Earley
State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617**

**FedEx: Renee Gledhill-Earley
State Historic Preservation Office
109 East Jones Street, 2nd Floor
Raleigh, NC 27601**

Or you may submit by email to: environmental.review@ncdcr.gov

Using this address will help ensure our timely receipt. Otherwise, your submittal may be lost or delayed in reaching us.

01387



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
Kentucky, Mississippi,
North Carolina, Puerto
Rico, South Carolina,
Tennessee, Virgin Islands

230 Peachtree St.,
N.W., Suite 800
Atlanta, GA 30303
404-865-5600

October 8, 2014

Ms. Renee Gledhill-Earley
State Historic Preservation Office
4617 Mail Service Center
Raleigh, North Carolina 27699-4617

RE: Authorization to Initiate Section 106 Consultation with SHPO/THPO and Others

Dear Ms. Gledhill-Earley:

This letter is notify you that the Federal Transit Administration (FTA) in cooperation with Research Triangle Regional Public Transportation Authority (dba "Triangle Transit") is currently in the preliminary design phase for a proposed major transit investment in Durham and Orange Counties that will be a Federal undertaking should FTA provide financial assistance. As such, the proposed project is subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and associated implementing regulations 36 CFR 800.

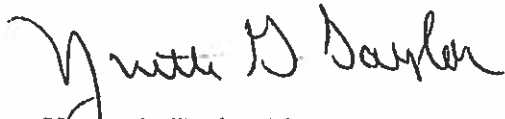
The proposed project would consist of the planning, development, and construction of a Light Rail Transit (LRT) system on double track alignment approximately 17.1 miles between east Durham (Alston Avenue/NCCU Station) and UNC Chapel Hill (UNC Hospitals Station). The proposed LRT alignment connects a range of activity centers including North Carolina Central University, east and downtown Durham, Duke University, Duke University Medical Center, Durham Veterans Administration Medical Center, the Friday Center, UNC Hospitals, and several park-and-ride lots. Convenient connections also will be made to Amtrak and local, regional, and intercity bus service in downtown Durham.

The exact locations of each element of the LRT are still to be determined however the LRT alignment generally follows the North Carolina Railroad Corridor, Erwin Road, US 15-501, I-40 and NC 54. A total of 17 stations are planned.

Per Subpart A, Section 800.2(a)(3) and 800.2(c)(4) of 36 CFR 800, FTA is authorizing TTA as an applicant for federal assistance, to prepare information, analyses, and recommendations regarding the Section 106 consultation process for the proposed project. The delegated authority to initiate consultation **does not extend** legal responsibility for any and all findings and determinations, **as this shall remain with FTA**. FTA will also remain responsible for all government-to-government relationships with all federally recognized tribes for the proposed project.

Thank you in advance for your assistance with the proposed project. Representatives from TTA and/or their consultants will be contacting your office as the project proceeds. Please contact Mr. Stan Mitchell of my staff at (404) 865-5643 or at stanley.a.mitchell@dot.gov should you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Yvette G. Taylor".

Yvette G. Taylor, Ph.D.
Regional Administrator

CC: Meghan Makoid, Triangle Transit Authority, P.O. Box 13787,
Research Triangle Park, NC 27709



November 6, 2014

Renee Gledhill-Earley, Environmental Review Coordinator
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617

RE: Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0378

Dear Ms. Gledhill-Earley:

Thank you for consulting with the Federal Transit Administration (FTA) and Triangle Transit (TTA) and for meeting with us on August 25, 2014. As you may recall, we reviewed the preliminary historic Area of Potential Effects (APE) that TTA submitted to the North Carolina State Historic Preservation Office (SHPO) for the proposed Durham-Orange Light Rail Transit (D-O LRT) project (an Undertaking pursuant to 36 CFR 800.4(a)(1) and 800.16(d)).

During this meeting SHPO agreed that the proposed APE encompassed the geographic area within which the D-O LRT project might directly affect historic properties. However, SHPO expressed concern regarding the width of the proposed APE around stations due to the potential for indirect effects upon historic properties through future induced development.

SHPO requested that FTA consider expanding the APE to ½ mile around five station areas:

- Patterson Place Station
- Ninth Street Station
- Buchanan Station
- Durham Station
- Dillard Station

As a result of this consultation, FTA and TTA considered suggestion to expand the APE for these stations to determine the most appropriate approach for addressing SHPO's concerns. FTA also reviewed TTA's *Durham-Orange Light Rail Transit Corridor Transit Oriented Development (TOD) Assessment Report* (July 2011). This document was prepared to provide an initial evaluation of the potential future TOD within and near the station areas. FTA believes that these projections identify the potential for induced growth within and around the station areas.

FTA and TTA concluded that the best approach for addressing the potential effects of induced growth on historic resources is through the Indirect and Cumulative impact analysis, which will be completed as part of the National Environmental Policy Act (NEPA) process and included in the Draft Environmental Impact Statement. The Indirect and Cumulative impact analysis in the NEPA document will use information as appropriate from the TOD report and will

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Gledhill-Earley
RE: D-O LRT ER-12-0378
Page 2

include an expanded discussion around the station areas where growth is anticipated directly, indirectly and cumulatively from the project. This analysis will consider the effects of potential growth from TOD on historic properties ½ mile around the stations. FTA and TTA will continue to consult with SHPO to address its concerns related to impacts on historic properties as part of the NEPA process.

In response to SHPO's concerns about the APE, FTA and TTA have revised the APE boundaries for historic properties along the entire D-O LRT project corridor. While the revised APE does not extend to ½ mile around the five stations, it follows property boundaries, includes the full boundaries of the National Register-listed or eligible properties/districts located partially or fully within the originally proposed APE, and considers physical barriers such as NC 147 to the south. These revisions are reflected in the updated APE maps and described in the enclosed revised Historic Resources – *Durham-Orange Light Rail Transit Historic Resources Area of Potential Effects Report*.

At the request of FTA, TTA submits this letter and the enclosed documents for your files. The enclosed APE for historic resources defines the APE for the Undertaking and will be used to evaluate and determine the effects. Please call Stan Mitchell with FTA Region IV at (404) 865-5643 or email stanley.a.mitchell@dot.gov if you have any questions about the enclosed APE.

Should you need any additional D-O LRT project information, please contact me at (919) 485-7554 or email me at mmakoid@triangletransit.org. We look forward to continued consultation with your office as the D-O LRT project progresses.

Sincerely,



Meghan Makoid, AICP
Environmental Planner

cc: David King, General Manager, Triangle Transit
Stan Mitchell, Environmental Protection Specialist, FTA Region 4

Enclosures:

- *October 2014 - Durham-Orange Light Rail Transit Historic Resources Area of Potential Effects*
- *July 2011 - Durham-Orange Light Rail Transit Corridor Transit Oriented Development (TOD) Assessment*

Dolores A. Hall, Deputy State Archaeologist
North Carolina Office of State Archaeology, Department of Cultural Resources
4619 Mail Service Center
Raleigh, NC 27699-4619

November 7, 2014

RE: Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0738.

Dear Ms. Hall:

Thank you for consulting with the Federal Transit Administration (FTA) and Triangle Transit (TTA) on August 25, 2014 and for meeting with us on August 25, 2014. As you may recall, we reviewed the preliminary archaeology Area of Potential Effects (APE) that TTA submitted to the North Carolina Historic Preservation Office for the proposed Durham-Orange Light Rail Transit (D-O LRT) project. SHPO agreed that the proposed APE encompassed the geographic area within which the D-O LRT project may affect archaeological resources. As such, FTA and TTA will use this APE to evaluate and determine the effects.

Also during the meeting on August 25, 2014, SHPO requested to meet with TTA's archaeological consultant, Matthew Jorgenson of URS Corporation (URS) to discuss the future archaeological fieldwork needs. The meeting between SHPO and Mr. Jorgenson occurred on September 14, 2014. During the meeting, SHPO identified the need for Phase I archaeological survey work along five sections of the D-O LRT project:

1. north of Mason Farm Road between UNC and US 15/501,
2. between George King Road and Interstate 40 (I-40),
3. the Leigh Village, Farrington Road, or Patterson Place Rail Operations and Maintenance Facility (ROMF) (if any of those options are chosen as the one ROMF planned for the entire project area),
4. the Gateway Park-and-Ride lot west of I-40 at the US 15/501 interchange, and
5. between US 15/501 and Erwin Road.

Further, it was agreed by SHPO that Phase II testing of site 31DH655**, which was previously recommended as potentially eligible for the National Register of Historic Places (NRHP) (Webb and Millis 1999:31), might be needed; however, re-locating and re-assessing the current state of the site would be the recommended first step to determining if this testing, recommended 15 years ago, is still warranted. Similarly, additional work in the form of mechanical removal of historic overburden/fill at potential site (PS) 1 (based on historic map evidence depicting a planning mill, office building, and a Durham Granite Company facility in the area) (Webb and Millis 1999:30), located immediately east of Buchanan Street and south of the North Carolina Rail Road (NCRR) right-of-way, may also be needed, depending on the relation of the chosen alignment of the D-O LRT and PS-1. Finally, similar mechanically-assisted overburden removal at PS-3 (based on historic map evidence depicting the Durham Bottling Works in that location) (Webb and Millis 1999:37), located west of Blackwell Street and south of the NCRR right-of-way, may be needed. PS-3 was initially assessed as not being adversely affected by the Wake-Durham Regional Rail project based on the plan to build the system on the existing gravel berm; however, as recommended by Webb and Millis (1999:37), the mechanical exposure

Hall
RE: D-O LRT ER-12 0738
Page 2

work may be needed if project plans include the removal or alteration of the berm, or if other ground disturbing activities are required.

As discussed in the meeting, the archaeological fieldwork tasks listed above would be performed at an undetermined future date during the final design phase of the project. TTA also understands that the archaeologist(s) involved in the fieldwork portion of the project would be required to obtain a permit from the state for any archaeological work performed on state-owned lands. Finally, TTA acknowledges that should significant changes to the D-O LRT alignment be made during the life cycle of the project, the above information would be amended as appropriate and further consultation with your office would be performed to address archaeological needs for any areas added to the project's APE.

At the request of FTA, TTA submits this letter and the enclosed document for your files. The enclosed document, *Archaeological Background Information: Durham-Orange Light Rail Transit Project*, summarizes known archaeological resources and past archaeological projects in relation to the archaeological APE for the proposed project. The document also makes recommendations regarding future fieldwork needs for the project as currently planned.

Please call Stan Mitchell with FTA Region IV at (404) 865-5643 or email stanley.a.mitchell@dot.gov if you have any questions about the APE for archaeological resources. Should you have any questions about the enclosed document or need any additional D-O LRT project information, please contact me at (919) 485-7554 or email me at mmakoid@triangletransit.org.

Again, thank you for meeting with our archaeological consultant on this matter. We look forward to continued consultation with your office as the D-O LRT project progresses.

Sincerely,



Meghan Makoid, AICP
Environmental Planner

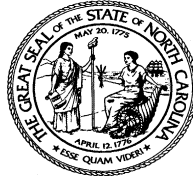
Cc: David King, General Manager, Triangle Transit
Stan Mitchell, Environmental Protection Specialist, FTA Region 4

Enclosure:

- *November 2014 - Archaeological Background Information: Durham-Orange Light Rail Transit Project*

References Cited:

Webb, Paul A., and Heather Millis
1999 *Archaeological Survey for Phase I of the proposed Triangle Transit Authority Regional Rail Project, Durham and Wake Counties, North Carolina*. Prepared by TRC Garrow Associates, Inc., Chapel Hill, North Carolina for Parsons Brinckerhoff Quade & Douglas, Inc., Morrisville, North Carolina. Manuscript on file, North Carolina Office of State Archaeology, Raleigh.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Pat McCrory
Secretary Susan Kluttz

Office of Archives and History
Deputy Secretary Kevin Cherry

January 6, 2015

Meghan Makoid
Triangle Transit
PO Box 13787
Research Triangle Park, NC 27709
mmakoid@triangletransit.org

Re: Architectural and Archaeological Area of Potential Effect Document and Archaeological Background Information Document, Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0738

Dear Ms. Makoid:

Thank you for your letters of November 6 and 7, 2014, transmitting the documents cited above for our review concerning the above project.

We appreciate your consideration of our concerns about the appropriate Area of Potential Effects (APE's).

We agree with your determination of APE for architectural resources.

The Archaeological Resources APE document accurately outlines the APE as developed and agreed upon during the August 25, 2014 meeting with the Federal Transit Administration, your agency and our office. On September 14, 2014, staff of the Office of State Archaeology met with Matthew Jorgenson of URS Corporation, your consultant, and reviewed previous archaeological investigations in the vicinity and delineated which areas of the proposed light rail transit project will require additional consideration of archaeological resources. The Archaeological Background Information document accurately reflects the results of that consultation.

We look forward to continued consultation and collaboration with you, your consultants and the Federal Transit Administration on this project.

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

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

Sincerely,



for Ramona M. Bartos



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IV
Alabama, Florida, Georgia,
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Atlanta, GA 30303
404-865-5600

Renee Gledhill-Earley
Environmental Review Coordinator
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617

Re: Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0378
Submission of Architectural History Survey for the Durham-Orange Light Rail Project,
Durham and Orange Counties, North Carolina: Durham – Orange Light Rail Transit
Project

Dear Ms. Gledhill-Earley:

This letter continues the Section 106 process for the proposed Durham-Orange Light Rail Transit (D-O LRT) project (an "Undertaking," pursuant to 36 CFR 800.4(a)(1) and 800.16(d)).

The attached documentation is the result of the *Architectural History Survey for the Durham-Orange Light Rail Project* that was undertaken in compliance with Section 106 of the National Historic Preservation Act of 1966. This survey was undertaken to identify historic resources listed in or eligible for listing in the National Register for Historic Places that may be affected by the proposed D-O LRT Project. The survey includes all resources within the defined Area of Potential Effects (APE) transmitted to you on November 6, 2014. This survey report and appendices were prepared by Marvin Brown of URS Corporation/AECOM, Triangle Transit's project consultant.

Triangle Transit and the FTA are in the process of preparing a Draft Environmental Impact Statement (DEIS). FTA is requesting your concurrence with our eligibility determinations for properties within the APE within 30 days.

Please call Stan Mitchell with FTA Region IV at (404) 865-5643 or via email at stanley.a.mitchell@dot.gov or Carrie Walker at FTA Region IV at (404) 865-5645 or via email at julia.walker@dot.gov, or my staff if you have any questions about the attached documents.

Re: Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0378
Submission of Architectural History Survey for the Durham-Orange Light Rail Project,
Durham and Orange Counties, North Carolina: Durham – Orange Light Rail Transit
Project

FTA and Triangle Transit look forward to continued consultation with SHPO to address its concerns related to impacts on historic properties as part of the NEPA process.

Sincerely,

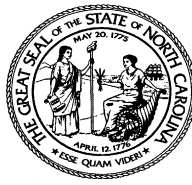


For Yvette G. Taylor, Ph.D.
Regional Administrator

Enclosures:

- *March 2015 – Architectural History Survey for the Durham-Orange Light Rail Project, Durham and Orange Counties, North Carolina: Durham – Orange Light Rail Transit Project*
- *March 2015 – Appendix A - Architectural History Survey for the Durham-Orange Light Rail Project, Durham and Orange Counties, North Carolina: Durham – Orange Light Rail Transit Project*
- *March 2015 – Appendix B – Resume of Principal Investigator for Architectural History Survey for the Durham-Orange Light Rail Project, Durham and Orange Counties, North Carolina: Durham – Orange Light Rail Transit Project*

cc: David King, General Manager, Triangle Transit
Stan Mitchell, Environmental Protection Specialist, FTA Region 4
Carrie Walker, Environmental Protection Specialist, FTA Region 4



North Carolina Department of Cultural Resources
State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Pat McCrory
Secretary Susan Kluttz

Office of Archives and History
Deputy Secretary Kevin Cherry

April 16, 2015

Yvette G. Taylor, Ph. D.
Region IV Administrator
Federal Transit Administration
230 Peachtree Street NW, Suite 1400
Atlanta, GA 30303

Attention: Stan Mitchell
Carrie Walker

Stanley.a.mitchell@dot.gov
Julia.walker@dot.gov

RE: Architectural History Survey for Durham-Orange Light Rail Transit Project,
Durham and Orange Counties, ER 12-0738

Dear Dr. Taylor:

Thank you for your recent letter, which we received on March 19, 2015 and which transmitted the above-referenced historic survey report for the Durham-Orange Light Rail Transit Project. We have reviewed the report and offer the following comments.

We concur with the report's determinations of eligibility with the following notes and/or exceptions.

p. xii: The paragraph in the middle of the page is confusing as it seemed to be missing something. We believe the missing element is the beginning of the fourth paragraph on p. 2-1 – that as a result of the post-reconnaissance presentation and input from the various parties, Marvin Brown conducted additional fieldwork at and research into 11 resources and groups of resources.

pp. xii and 3-16: The entries on the Downtown Durham Historic District should note the Additional Documentation nomination listed in 2012 that updated the inventory list.

p. 3-45: The National Register assessment of the Shankle House, 2nd paragraph: Association with significant people is Criterion B, not C; and association with an architect, unless the property was his personal residence, is always Criterion C, not B. The last five sentences of this paragraph are thus irrelevant as far as Criterion B is concerned and should be deleted or moved to the end of the first paragraph and rephrased (i.e., not under C as the work of a master).

p. 3-49: The reference to the survey more than ten years ago of modernist buildings in Chapel Hill, here and elsewhere in the report, should be amended to note that it was conducted by Diane Lea and Claudia Brown. Ruth Little did selective follow-up interviews, including one with the owner of the Bowers-Nelson House, but Lea and Brown did the survey work. The foreword of Little's book alludes to "a recently updated survey of the town's modern architecture" but does not identify the surveyors, and consequently Mr. Brown naturally assumed that the work was Little's minus a closer examination of the SHPO survey files.

p. 3-55, 2nd paragraph: Again (see comments on p. 3-45 above), the suggestion that the house could be eligible under Criterion B for its association with the architect is erroneous.

p. 3-75: The Highland Woods HD should be found eligible under Criteria A and C, not just A, as the modernist designs of the majority of the houses is an intrinsic aspect of the overall design of the neighborhood and the number of houses that are so altered that they are noncontributing is not great enough to preclude significance under Criterion C.

p. 3-104 (a minor point): Sentences 5 and 6 in the first paragraph about the Robersons' purchase of property in Forest Hills is confusing (sentence 6 is not an obvious conclusion) without the insertion of the streets on which the three lots purchased in 1923 and the Tudor Revival-style house are located (Hermitage Court and Briar Cliff Road, respectively).

p. 3-115: The conclusion of ineligibility under Criterion A cannot be supported without comparing and contrasting the Ruth-Sizemore Store to the county's four other one-story frame stores similar in date and form, particularly in terms of integrity. Simply stating that it must have a high degree of integrity because there are four other similar stores is not sufficient, especially considering that the alterations to the store do not seem to be extensive.

p. 3-151: The extensive interior alterations preclude eligibility under Criterion C and possibly under Criterion A as well. Is any interior integrity retained? More information is needed to support eligibility under Criterion A.

pp. 3-179 to 3-181: The NC Mutual Building is eligible under Criterion A but the case has not been made for eligibility under Criterion C. (Note, regarding first full paragraph on p. 3-180: significance for engineering is Criterion C, not A.) The building's engineering and architecture are inextricable, as noted in the second paragraph on p. 3-180. The fact that the engineering failed to the point that structural retrofitting was required in the late 1980s is noted but played down. The impact of the retrofitting on the appearance of the building is barely noted, even though the retrofitting eliminated the appearance of the cantilevering that was essential to the building's engineering and architectural significance. Retaining strong horizontal and vertical lines is not an adequate argument for retention of sufficient integrity for eligibility under Criterion C.

We would very much appreciate the above revisions be made to the report so that we can fully agree to the determinations of eligibility and the criteria on which the determinations are based. Errata pages that we can insert into our hard copy of the report as well as a corrected copy of the report on a CD would be acceptable. For ease of future reference, we would also appreciate a complete listing of all National Register-listed and eligible properties within the project's Area of Potential Effects. The list should include the name of each property, its survey site number, National Register status and the criterion or criteria for its eligibility. The model for this list is found on pp. xi-xii, with the addition of the survey site number and criteria. We have found that such a list proves very helpful when assessing the project's effect on the historic properties.

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

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

Sincerely,



for Ramona M. Bartos

cc: David King, TTA, dking@triangletransit.org
Marvin Brown, URS, marvin.brown@urs.com

June 25, 2015

Connecting all points of the Triangle

Renee Gledhill-Earley
 Environmental Review Coordinator
 North Carolina State Historic Preservation Office
 4617 Mail Service Center
 Raleigh, NC 27699

RE: Revised Architectural History Survey and Section 106 Assessment of Effects for Historic Properties for Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0738

Dear Ms. Gledhill-Earley,

Thank you for your letter dated April 16, 2015, written in response to the submittal of the Architectural History Survey for the Durham-Orange Light Rail Transit Project. GoTriangle (formerly Triangle Transit) delivered this report to the North Carolina State Historic Preservation Office (NC SHPO) on behalf of the Federal Transit Administration (FTA) on March 19, 2015.

The FTA acknowledges that in your letter you note the SHPO’s concurrence with the determinations of eligibility with notes and/or exceptions. As requested, the FTA is resubmitting the revised Architectural Historic Survey for the Durham-Orange Light Rail Transit Project to address your comments.

The table below notes the location of the SHPO comment in the report, the nature of the SHPO comment, and the response to address the comment. Due to the nature of the edits, a corrected hard copy of the report is being submitted along with the revised report on a CD.

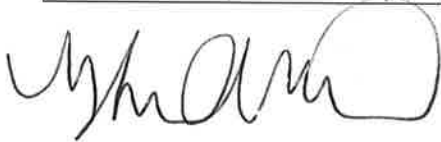
Page #/Comment	Response
Page xii – comment on unclear language	Language revised to clarify that Marvin Brown conducted fieldwork and research at 11 resources and groups of resources.
Pages xii and 3-16 – request to add 2012 reference	Reference to 2012 Additional Documentation for Downtown Durham Historic District added at both pages.
Page 3-45 – request for correction of NR Criterion cited	Reference to potential significance of architect Sumner Winn corrected from Criterion B to Criterion C and text concerning potential significance of Winn shifted to end of first paragraph.
Page 3-49 – additional citation request	Chapel Hill modernist survey completed by Claudia Brown and Diana Lea credited to them at this page; work also credited at page 2-1 and reference to it added to bibliography.
Page 3-55 -- request for correction of NR Criterion cited	Discussion of potential significance of architect Don Stewart corrected to refer to Criterion C rather than B.
Page 3-75 – comment on potential eligibility of resource	Architecture of resources reconsidered and eligibility assessment paragraphs revised to state that Highland Woods Historic District is National Register-eligible under Criteria A and C. Other reference to eligibility at Executive Summary table revised.
Page 3-104 – comment on unclear language	First paragraph revised to clarify that the Robersons owned two separate parcels/groups of parcels in Forest Hills.

(Continued on Page 2...)



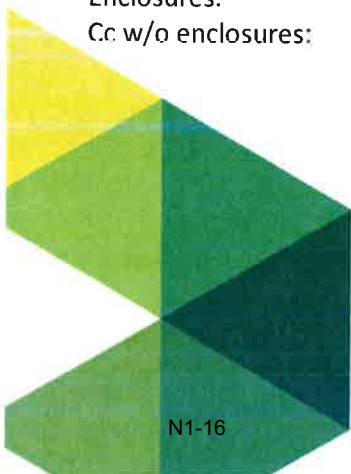
Page #/Comment	Response
Former page 3-115/revised-report page 3-114 – comment on potential eligibility of resource	Integrity of other country stores in Durham County reconsidered and eligibility assessment revised to state that Ruth-Sizemore Store is National Register-eligible under Criterion A. Map and narrative description of National Register-eligible boundaries of store added to revised-report at page 3-115. Other references to eligibility of store at Executive Summary table and at APE maps/Figures 9 and 10 revised.
Page 3-151 -- comment on potential eligibility of resource	Extensive nature of interior alterations reconsidered and eligibility assessment of Durham Coca-Cola Bottling Plant revised to state that the resource is not National Register-eligible under any Criteria due to loss of integrity. Map and narrative description of proposed National Register-eligible boundaries of plant removed. Other references to eligibility of plant at Executive Summary table and APE maps/Figures 18 and 19 revised.
Pages 3-179 to 3-181 -- comment on potential eligibility of resource	Extensive nature of exterior alterations/retrofitting of corner columns reconsidered and eligibility assessment of North Carolina Mutual Building revised to state that it is not National Register-eligible under Criterion C due to loss of integrity. Other reference to eligibility at Executive Summary table revised.
Page 3-180 -- request for correction of NR Criterion cited	Reference to potential engineering significance of North Carolina Mutual Building corrected from Criterion A to Criterion C. Language assessing potential engineering significance of building shifted to paragraph assessing Criterion C.
General comment regarding corrections to report	All comments have been addressed in a revised report that includes final National Register assessments.
General comment regarding addition of complete list of resources	A table of National Register-Listed and Eligible Resources within Area of Potential Effect added as Appendix D. It includes resource name, survey site number, National Register status, and eligibility Criteria.

Other Changes/Location	Nature of Change
Addition of sources at Bibliography	References added for Cynthia deMiranda's Additional Documentation for Downtown Durham Historic District and for personal communication with Dennis Hoyle regarding retrofitting of North Carolina Mutual Building.
Addition of correspondence at new Appendix C	Appendix C added, which includes SHPO/FTA correspondence up to and including SHPO comment letter of April 16, 2015.
Updated series of APE maps/Figures 2 to 21 added to replace earlier maps	Updated maps bring report up to date regarding the alignment; changes do not affect eligibility or assessment of any of the resources included in the report.



Meghan A. Makoid, AICP
Environmental Planner
mmakoid@gotriangle.org

Enclosures: Revised Architectural History Survey [One (1) hard copy and one (1) CD]
Cc w/o enclosures: Stanley A. Mitchell, Environmental Protection Specialist, FTA Region IV





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

Ramona M. Bartos, Administrator

Governor Pat McCrory
Secretary Susan Kluttz

Office of Archives and History
Deputy Secretary Kevin Cherry

July 17, 2015

Meghan A. Makoid
Environmental Planner
Go Triangle

mmakoid@gotriangle.org

RE: Revised Architectural Historic Survey and Section 106 Assessment of Effect for Historic Properties,
Durham-Orange Light Rail Transit Project, Durham and Orange Counties, ER 12-0738

Dear Ms. Makoid:

Thank you for your letter of June 25, 2015 documenting the submission of the above-referenced report for the Durham-Orange Light Transit Project. We have reviewed the revised report and find that all of the recommended changes have been made. The addition of Appendix D with the table of the National Register-listed and Eligible Resources within the APE is especially appreciated and serves to document the changes in criteria that we suggested for the eligible properties.

We note that the subject line for your letter reads "Revised Architectural Historic Survey and Section 106 Assessment of Effect for Historic Properties." However, having talked with you on July 9, 2015, we determined that the Assessment of Effects was not included as it is still under review by the Federal Transit Administration. Once it is available, we will promptly review it and comment.

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

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

Sincerely,


Ramona M. Bartos

cc: Marvin Brown, URS

August 11, 2015

Renee Gledhill-Earley
Environmental Review Coordinator
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617

**RE: Durham-Orange Light Rail Transit Project, Durham and Orange Counties, North Carolina,
ER 12-0378, Submission of Section 106 Preliminary Assessment of Effects for Historic Properties Report**

Dear Ms. Gledhill-Earley:

This letter continues the Section 106 of the National Historic Preservation Act of 1966 process for the proposed Durham-Orange Light Rail Transit (D-O LRT) project (an "Undertaking" pursuant to 36 CFR 800.4(a)(1) and 800.16(d)).

The attached *Section 106 Preliminary Assessment of Effects for Historic Properties for Durham-Orange Light Rail Project, Durham and Orange Counties, North Carolina* report was prepared in compliance with CFR 800.4 and 800.5. It includes FTA's preliminary assessment of the project's potential to have effects on 25 historic properties previously identified within the project's Area of Potential Effects and provides the State Historic Preservation Officer (SHPO) with the opportunity to review the FTA's preliminary finding of No Adverse Effect.

Triangle Transit and the FTA are in the process of preparing a Draft Environmental Impact Statement. FTA is requesting your consultation and concurrence with their effects findings within 30 days of receipt of this letter and the attached report.

Please contact Stan Mitchell with FTA Region IV at (404) 865-5642 or via email at stanley.a.mitchell@dot.gov, or Carrie Walker at FTA Region IV at (404) 865-5645 or via email at Julia.walker@dot.gov, if you have any questions about the attached documents.

FTA and Triangle Transit look forward to continued consultation with the SHPO to address its concerns related to potential impacts on historic properties as part of the NEPA process.

Regards,

A handwritten signature in blue ink that reads "David A. Charters, Jr." in a cursive script.

David A. Charters, Jr, PE
Manager, Design & Engineering
GoTriangle (formerly Triangle Transit)

Enclosures: *Section 106 Preliminary Assessment of Effects for Historic Properties for Durham-Orange Light Rail Project, Durham and Orange Counties, North Carolina*

cc: Stanley A. Mitchell, Environmental Protection Specialist, FTA Region IV (with one hard copy via overnight delivery)
Julia Carrie Walker, Environmental Protection Specialist, FTA Region IV