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**DEPARTMENT OF TRANSPORTATION
STATE OF GEORGIA**

INTERDEPARTMENT CORRESPONDENCE

FILE P.I. # 132980

OFFICE Environmental Services

FROM Chad Carlson

DATE June 28, 2013

TO Files

SUBJECT GDOT Project BRST0-0052-01(012); Walton County;
P.I. #132980 and HP #040507-003;
Re-evaluation

Project BRST-052-1(12), Walton County, consists of the proposed replacement of a structurally deficient bridge on SR 11 over CSX Railroad in Social Circle, Walton County. A historic resources survey was conducted in October 2005, and one property, the Social Circle Historic District, was identified within the proposed project's area of potential effect (APE). The Social Circle Historic District is listed in the National Register of Historic Places. The State Historic Preservation Office concurred with this finding by a memo dated January 3, 2006. A finding of Adverse Effect was determined for the Social Circle Historic District and SHPO concurred with this finding by a letter dated December 21, 2010. A Memorandum of Agreement (MOA) was signed on November 14, 2011. The following mitigation stipulations were proposed and agreed upon by the SHPO and the Federal Highway Administration (FHWA), in the MOA:

1. Prior to project implementation, GDOT will ensure that representative views of the Social Circle Historic District's setting within the project area, 304 S. Cherokee Road, and the setting around the bridge to be replaced will be photographed with high resolution digital photography per the National Register Photo Policy.
2. GDOT will ensure that Modified Texas Rail will be used in the design of the new bridge to minimize the visual effect of the bridge on the Social Circle Historic District.
3. GDOT will coordinate with the Historic Preservation Commission of Social Circle and sponsor an updated DNR survey for the City of Social Circle.

Reevaluations for the project were issued ⁱⁿ October 2011 and September 2012.

Since that time it has been determined that the sidewalk to be removed in the area of 261, 284, 292, 298, 301, 304, 305, 315, 364, and 392 S. Cherokee Road, and 127 Hickory Drive, is a historic feature that contributes to the National Register eligibility of the district. The September 4, 2012, reevaluation for the project (see attached) discussed the sidewalk replacement but did not identify the sidewalk as being historic and contributing to the district.

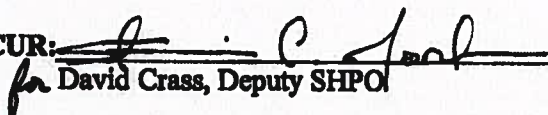
The sidewalk at 301, 305, 315, and 364 South Cherokee Road is currently below the grade of SR 11 (see attached photos); the new sidewalk at these locations would be constructed at the same grade as the new, reconstructed roadway. At all other locations where sidewalk is being replaced the sidewalk is currently at grade and would be replaced in kind, i.e., at the northeast, northwest (north of 301 S. Cherokee), and southeast (south of 364 S. Cherokee) sides of the bridge. There are no existing sidewalks on the southwest side of the bridge.

The impact of this historic sidewalk replacement would result in an additional adverse impact to the district because the historic design of the sidewalk—below grade—would be elevated to the level of the newly constructed roadway. However, because the original finding for the Social Circle Historic District was Adverse Effect, and mitigation is already being implemented as a result of this finding which also mitigates these additional impacts, the original finding of Adverse Effect is still valid and no additional documentation, including no additional mitigation, under Section 106 is required.

If your office agrees with this determination, please sign below. If additional information is required please contact Chad Carlson (404-631-1406 or ccarlson@dot.ga.gov) or Sandy Lawrence (404-631-1150 or slawrence@dot.ga.gov) of the Office of Environmental Services. We appreciate your assistance in this manner.

Attachments

cc: Rodney N. Barry, FHWA, w/attachments (attn: Kelly Wade and Katy Allen)
David Crass, Deputy SHPO, w/attachments

CONCUR:  DATE: 7.2.13
for David Crass, Deputy SHPO

cc: Sam Pugh, GDOT NEPA
Derrick Brown, GDOT Assistant Project Manager

Keith Golden, P.E., Commissioner



GEORGIA DEPARTMENT OF TRANSPORTATION

One Georgia Center, 600 West Peachtree Street, NW
Atlanta, Georgia 30308
Telephone: (404) 631-1000

September 7, 2012

Dr. David Crass, Director,
Deputy State Historic Preservation Officer,
and State Archaeologist
Historic Preservation Division/DNR
254 Washington Street, SW
Ground Level
Atlanta, GA 30334

Attn: Amanda Schraner

RE: GDOT Project BRST0-0052-01(012); Walton County,
PI #132980, HP #040307-003
Social Circle Historic District

Attached is a memorandum prepared by Erin Lane of the consulting firm URS of Atlanta, Georgia, for the subject project. In August 2012, the project was revised to install ADA compliant sidewalks. The APE of the project would not be increased, and no additional right-of-way or easement acquisition would be required; however, there are additional impacts to features that contribute to the National Register listed Social Circle Historic District. Because the original finding for the Social Circle Historic District was Adverse Effect, and mitigation is being implemented as result of this finding, the original finding of Adverse Effect is still valid and no additional documentation under Section 106 is required.

If your office agrees with this determination, please sign below. If additional information is required, please contact Chad Carlson (404-631-1406 or ccarlson@dot.ga.gov) or Sandy Lawrence (404-631-1150 or slawrence@dot.ga.gov) of the Office of Environmental Services. We appreciate your assistance in this matter.

Sincerely,

Glenn Bowman
Glenn Bowman, P.E.
State Environmental Administrator

GB/cbc
Enclosure

cc: Rodney N. Barry, P.E., FHWA, w/attachment (Attn: Kelly Wade)
Sam Pugh, GDOT NEPA, w/attachment
Northeast Georgia Regional Commission, w/attachment

CONCUR: *David Crass*
for David Crass, Deputy SHPO

DATE: 9/7/12



Memorandum

Date: September 4, 2012
To: Files
From: Erin Lane
Subject: *Walton County, BRST0-0052-01(012), PI No. 132980, HP No. 040507-003
Reevaluation No. 2*

The proposed project would consist of the replacement of a structurally deficient bridge on State Route (SR) 11 over CSX Railroad in Social Circle, Walton County (refer to Figure 1: Project and Resource Location Map). The existing bridge measures 151 feet with a deck width of 35.3 feet. The existing right-of-way is 60 feet. The replacement bridge would measure 160 feet in length with 44 feet of clear width. The right-of-way would be maintained at 60 feet. Replacement of the bridge requires that CSX Railroad height clearance standards be accommodated in the project; as such, the bridge clearance height would be raised by four feet to meet the standards. The bridge would be closed during construction and Social Circle Bypass would be used as a detour.

A historic resources survey was conducted in October of 2005, and one property was identified within the proposed project's area of potential effect (APE). The Social Circle Historic District is listed on the National Register of Historic Places (NRHP). The State Historic Preservation Officer (SHPO) concurred with this finding via a memo dated January 3, 2006. A finding of Adverse Effect was determined for the Social Circle Historic District, and SHPO concurred with this finding in a letter dated December 21, 2010. A Memorandum of Agreement (MOA) was signed on November 14, 2011. A reevaluation was completed in October 2011 to summarize the public involvement efforts undertaken for the proposed project. The reevaluation memo received concurrence from the Georgia Department of Transportation on October 18, 2011.

Since that time, the design of the project has been modified. Due to changes in the design of the sidewalks and guardrail along SR 11, it has been determined that five sets of historic steps that contribute to the eligibility of the district could not be avoided during construction. The steps are located at 301 South Cherokee Road, 305 South Cherokee Road, 315 South Cherokee Road, 364 South Cherokee Road, and 379 South Cherokee Road. In order to comply with the American with Disabilities Act (ADA), new sidewalks would be constructed along SR 11. As stated in the original AOE, land would be regraded for the construction of slopes in order to tie into SR 11 as it is elevated in order to accommodate the required clearance height of the bridge at the location of the steps. Additionally, the historic oak tree located on the property at 364 South Cherokee Road at the intersection of South Cherokee Road and Cannon Drive would continue to be avoided during the construction of the proposed project. Orange safety fencing would be placed the historic oak tree and will be instituted as general notes in the construction contract. The orange safety fencing around the tree would be placed at the back of the easement from Station 101+00 proceeding northward around the radius of Cannon Drive.

New sidewalks would be constructed along SR 11 at 301 South Cherokee Road and 305 South Cherokee Road. The existing steps at 301 South Cherokee Road and 305 South Cherokee Road would be located approximately two feet below the new roadway and sidewalk. The existing steps at both properties cannot be extended to meet the increased height of the new roadway and sidewalk, i.e. additional steps cannot be

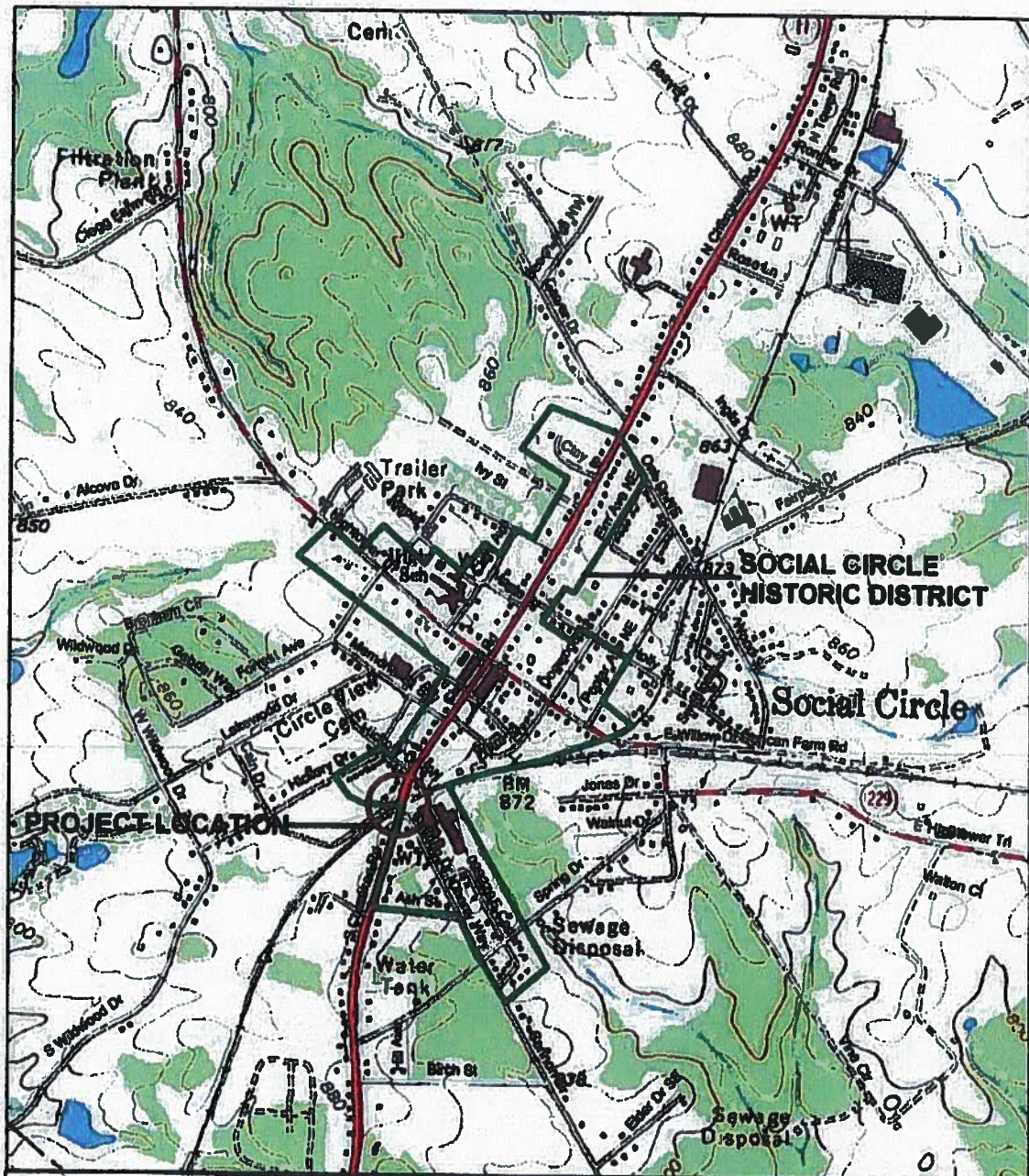


Figure 1: Project and Resource Location Map

Scale: 5 inches = 1 mile

**GDOT Project
BRST0-0052-
01(012),
P.L. No. 132980,
HP No. 040 507-**



constructed above the existing steps in order to reach the increased height of the new roadway and sidewalk. The existing steps would be removed. New steps would be constructed at both properties and tied back into the homeowner's existing walkway.

A new sidewalk would be constructed along SR 11 at 315 South Cherokee Road. A 31-inch tall, galvanized metal guardrail would be installed behind the new sidewalk. The purpose of the guardrail would be to prevent cars from crashing into the bridge parapets and properties adjacent to the ends of the bridge. Project construction limits would fill over the existing sidewalk and steps. Sidewalk access from the property would be eliminated and no steps would be replaced because a break in the guardrail to allow access for steps would pose a safety risk to motorists.

A new sidewalk would be constructed along SR 11 at 364 South Cherokee Road. The existing steps would be removed to allow the construction of the new sidewalk. New steps would not be necessary because the new sidewalk is being constructed at the roadway elevation.

A new sidewalk would be constructed along SR 11 at 379 South Cherokee Road. The existing steps at 379 South Cherokee Road would be located approximately five feet below the new roadway and sidewalk. The existing steps cannot be extended to meet the increase height of the new roadway and sidewalk, i.e. additional steps cannot be constructed above the existing steps in order to reach the increased height of the new roadway and sidewalk. The existing steps would be removed. New steps would be constructed and tied back into the homeowner's existing walkway.

As a result of the changes, the proposed project would continue to have an adverse effect on the Social Circle Historic District. Three alternatives to avoid adverse effect to the Social Circle Historic District were discussed in the Assessment of Effects (AOE): no build, construction of the Social Circle bypass route, and the rehabilitation of SR 11 over the CSX Railroad tracks. All three alternatives were determined not to be prudent and feasible alternatives to the proposed project. Additionally, planning to minimize harm was taken into consideration to the extent possible during project development. Originally, the proposed project included guardrails and retaining walls to avoid requiring the need to acquire land from any of the properties considered contributing to the Social Circle Historic District adjacent to the bridge. However, it was later determined that construction of the retaining walls would adversely affect historic features of the setting, as well as the view shed of the properties within the district.

As a result of the redesign of the project to incorporate ADA compliant sidewalks, one additional avoidance alternative was considered. The construction of retaining walls in order to avoid adverse effects to the historic steps has been reexamined. While constructing retaining walls would eliminate the need to acquire right-of-way from contributing properties in the historic district, and therefore, not require the removal of the historic steps from their existing locations, they would adversely affect the historic district as discussed above. Additionally, construction of the retaining walls would leave in place the existing steps and sidewalks that could not be effectively used by pedestrians as the project is designed. In places where the existing sidewalk and stairs are located below the existing roadway, new sidewalks would be constructed adjacent to the improved roadway and the existing sidewalk and stairs would be left in place. The existing sidewalk and stairs would dead-end into the retaining walls and would not allow pedestrians to effectively negotiate the new sidewalks and existing intersections along SR 11. Therefore, the construction of retaining walls would not be a prudent avoidance alternative for the proposed project.

Planning to minimize harm was taken into consideration to the extent possible during project development. In three locations where historic steps would be removed in order to meet ADA requirements that dictate that new sidewalks be constructed, new steps would be constructed and tied back into the homeowners' existing walkways. These new steps would allow pedestrians to continue to access both the properties and improved sidewalks along SR 11.

As a result of the 2010 finding of Adverse Effect to the Social Circle Historic District, the following mitigation stipulations were proposed, and agreed upon by the SHPO and the Federal Highway Administration (FHWA), in the AOE's MOA:

1. Prior to project implementation, GDOT will ensure that representative views of the Social Circle Historic District's setting within the project area, 304 South Cherokee Road, and the setting around the bridge to be replaced will be photographed with high resolution digital photography per the National Register Photo Policy.
2. GDOT will ensure that Modified Texas Rail will be used in the design of the new bridge to minimize the visual effect of the bridge on the Social Circle Historic District.
3. GDOT will coordinate with the Historic Preservation Commission of Social Circle and sponsor an updated DNR survey for the City of Social Circle.

No additional mitigation measures are being proposed.

**Walton County, P.I. # 132980
Social Circle Historic District**



Photo 1: Below grade sidewalk at 301, 305, and 315 South Cherokee Road, looking north.



Photo 2: Below grade sidewalk at 364 South Cherokee Road, looking north.