

INITIATE

IDENTIFY

ASSESS

RESOLVE

PROCEED

- **ARCHITECTURAL INTENSIVE-LEVEL SURVEY**

- Assessed NRHP-eligibility of Former Holy Church of Jesus Christ at 216 Marstellar Street
- Assessed NRHP-eligibility of area near southern end of WHD roughly between Wright Street, South Front Street and South 3<sup>rd</sup> Street/Burnett Boulevard



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## FORMER HOLY CHURCH OF JESUS CHRIST

- Took additional exterior photographs and did additional local research on September 30 and October 1, 2021
  - Research included viewing newspaper clippings, insurance maps and city directories at NH County Library's North Carolina Room
- Viewed church interior on November 7, 2021
- Visited approximately 30 potentially comparable area churches on November 7 to establish context
  - Located churches through NC Historic Preservation Office/NH County GIS maps and databases, and driving older neighborhoods





## FORMER HOLY CHURCH OF JESUS CHRIST

- Built ca. 1926
- Rare local example of basic, traditional, rectangular form and frame construction of late 19<sup>th</sup>-/early 20<sup>th</sup>-century Protestant meetinghouses
- Retains form; German siding, friezeboards, windows and surrounds; beaded-board ceiling/walls, wooden floor and original or early pews
- Retains a high degree of integrity
- Recommended eligible under NRHP Criteria C and Criterion Consideration A for its architecture



<b>Resource Name</b>	Former Holy Church of Jesus Christ
<b>HPO Survey Site #</b>	WA2591 (block face inventory form)
<b>Location</b>	216 Marstellar Street
<b>Parcel No.</b>	R05413-033-024-000
<b>Construction Date</b>	Ca. 1926
<b>Recommendation</b>	Eligible for NRHP listing under Criterion C/ Criterion Consideration A



# FORMER HOLY CHURCH OF JESUS CHRIST

Former Holy Church of Jesus Christ		
Element of Integrity	Level of Integrity	Assessment
Location	High	The church stands on the site where it was built, thereby retaining its integrity of location.
Design	High	The church has a high degree of design integrity, retaining its original single-story, rectangular, gable-front, frame form, bays, and materials, with no additions other than a small bathroom at the rear.
Setting	Medium/ High	The church continues to face Marstellar Avenue in a largely residential neighborhood dating from the early through the mid-twentieth century; two commercial buildings to its east were erected in the 1950s. It therefore retains a medium/high degree of integrity of setting.
Materials	High	The church has a high degree of material integrity, retaining its original exterior trim, windows, and German siding, as well as its original wooden floors and beaded-board walls and ceiling.
Workmanship	High	The retention of its integrity of design and workmanship results in the church having high integrity of workmanship.
Feeling	High	High integrity of location, design, materials, and workmanship, accompanied by a medium/high degree of setting, result in high integrity of feeling.
Association	High	High integrity of location, design, materials, and workmanship, accompanied by a medium/high degree of setting, result in high integrity of association.



## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

- Surveyed 129 resources, including vacant lots and park land, within area partially framed by southern end of WHD
  - Area was historically known as Dry Pond
- Insurance maps, city directories and tax records especially useful in identifying build dates, original owners, and alterations
- Entire survey area walked and photographs taken of each resource
- Emphasis placed on determining whether the resources
  - Individually and as a group retained their integrity
  - Were built after the end date of WHD's period of significance
  - Would or would not contribute to a potentially expanded historic district

	<b>Resource Name</b>	Wilmington Historic District — Potential Expansion
	<b>HPO Survey Site #</b>	Multiple block-face forms in potential expansion area
	<b>Location of Potential Expansion Area</b>	S of Wright Street, E of S Front St, W of Burnett Blvd/S 3rd St, N of Greenfield St, and W of S 4th St
	<b>Parcel No.</b>	Multiple
	<b>Construction Date</b>	Ca.1900-2020
	<b>Recommendation</b>	Not eligible for NRHP listing under any NRHP Criteria

## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

- Developed table including resource's address; type/name; date; brief description; and recommended status (potentially contributing, non-contributing, vacant lot)
- Created three 11" x 17" maps with addresses, lots, graphic representations of recommended status, other information
- See handouts





# WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION



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# WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION





## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION





## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

- 21 of the 98 resources were built within WHD's period of significance and retain their integrity; therefore, believed to contribute to a potential expansion of the WHD
- 77 resources would not contribute to a potential expansion of the WHD (42 due to lost integrity; 34 to age; and one moved)



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## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

- Consideration also given to vacant lots and prominently located noncontributing resources, which have an additional negative impact on the area's integrity



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## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

- About 3,250 resources in current WHD; approximately 78% identified as contributing, other 22% as noncontributing
- Percentage exactly flipped in potential expansion area
- 2003 WHD expansion includes part of Dry Pond; excludes studied area
  - Area excluded “due to loss of integrity along South Second and Third streets, [and] presence of modern residential and commercial buildings”
- Since 2003
  - loss of integrity has continued throughout the studied area
  - additional modern buildings have been built and lots cleared
- Assessed resources are believed, overall, to have low integrity





# WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

Wilmington Historic District—Potential Expansion Area		
Element of Integrity	Level of Integrity	Assessment
Location	High	The southern APE area resources stand on the sites where they were built, thereby retaining their integrity of location.
Design	Low	The southern APE area resources have an overall low degree of design integrity due to the many alterations to, or losses of, their original design features, including cladding, windows, entries, surrounds, woodwork, and porches.
Setting	Low	Due to the large number of vacant lots and resources erected after the end of the historic district's period of significance, a number of which stand on prominent corner lots, the southern APE area resources have an overall low degree of setting.
Materials	Low	The southern APE area resources have an overall low degree of integrity of materials due to the many alterations to, or losses of, their original materials, including cladding, windows, entries, surrounds, woodwork, and porches.
Workmanship	Low	The southern APE area resources have an overall low degree of integrity of workmanship due to the many alterations to, or losses of, their original features, including cladding, windows, entries, surrounds, woodwork, and porches.
Feeling	Low	High integrity of location and low integrity of design, setting, materials, and workmanship result in low integrity of feeling.
Association	Low	High integrity of location and low integrity of design, setting, materials, and workmanship result in low integrity of association.



## WILMINGTON HISTORIC DISTRICT – POTENTIAL EXPANSION

- Recommendation: resources within potential expansion area not believed to retain sufficient overall integrity to support significance and do not merit NRHP listing
- The resources within the study area are not believed to represent, in the words of the WHD NRHP nomination “the intact components of the residential, industrial, institutional, and commercial developments important to the history of Wilmington's working class.”

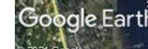




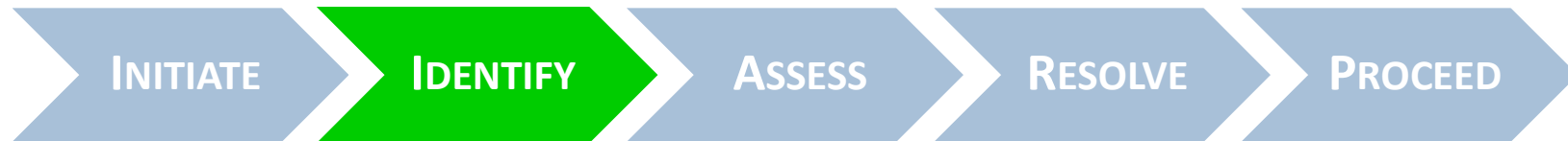




- APE is largely tidal marsh not conducive to presence of archaeological sites
- Revisited one previously recorded archaeological site **31NH686**
- Identified one new archaeological site **31NH895**
- Both archaeological sites located in northern portion of project; no resources identified on Eagles Island or in Wilmington







## APE CONDITIONS



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## APE OVERVIEW – DREDGE SPOIL



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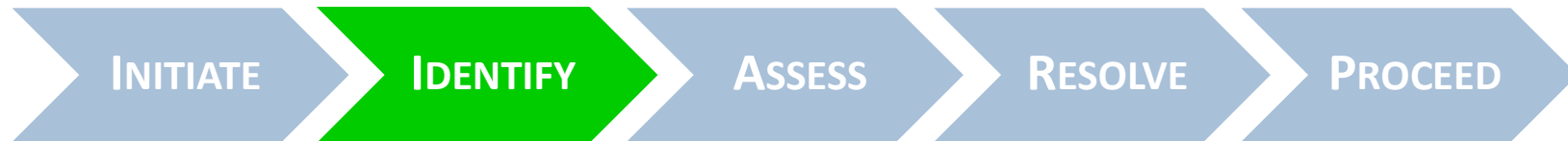
PROCEED

## APE OVERVIEW – WILMINGTON



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- **SITE 31NH686**

- Recorded in 1992 by OSA
- Historic Site
  - Railroad related
- Recommended not NRHP eligible in 1992
- Situated on sandy rise
- Current work identified surface traces of site including railroad spike in tree (see right) and granite fragment with drilled holes (see next slide)
- Shovel testing during current project recovered mix of historic items and a few prehistoric ceramic sherds





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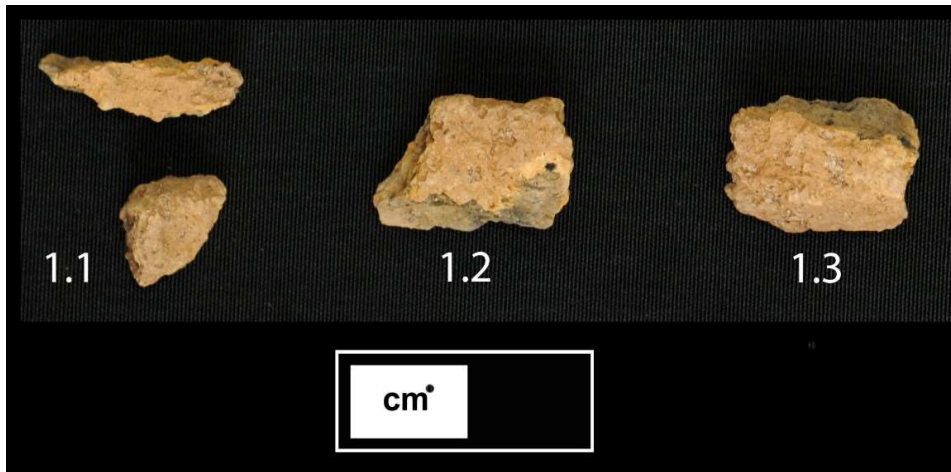
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## 31NH686 – ARTIFACTS

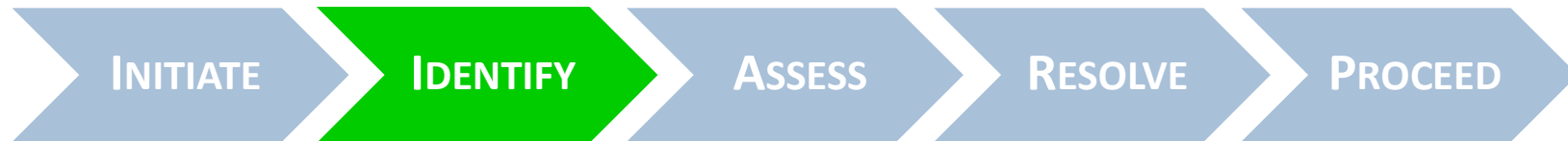


- Prehistoric ceramics: Cape Fear fabric impressed (Middle Woodland)
- Historic artifacts: window glass, brick fragments, coal, slate, lead
- Artifacts from upper 30cm from disturbed surface contexts



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## • **SITE 31NH686 RECOMMENDATIONS**

- Previously recommended not eligible for NRHP in 1992
- Current results indicate site lacks intact deposits and does not exhibit the potential to provide significant data
- Site 31NH686 is recommended as not eligible for NRHP





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## • SITE 31NH895

- Recorded during this project
- Historic Site
  - Residential related
  - Railroad related subsequently
- Corresponds to structure depicted on 1888 Geodetic Survey map of Cape Fear River
- Situated along linear rises in marsh
  - Some historic origin as access road (1888 map)
  - Railroad constructed across site in 1889
  - Large dikes created by USACE for dredge spoil dewatering ca. 1950s



View west along narrow dike



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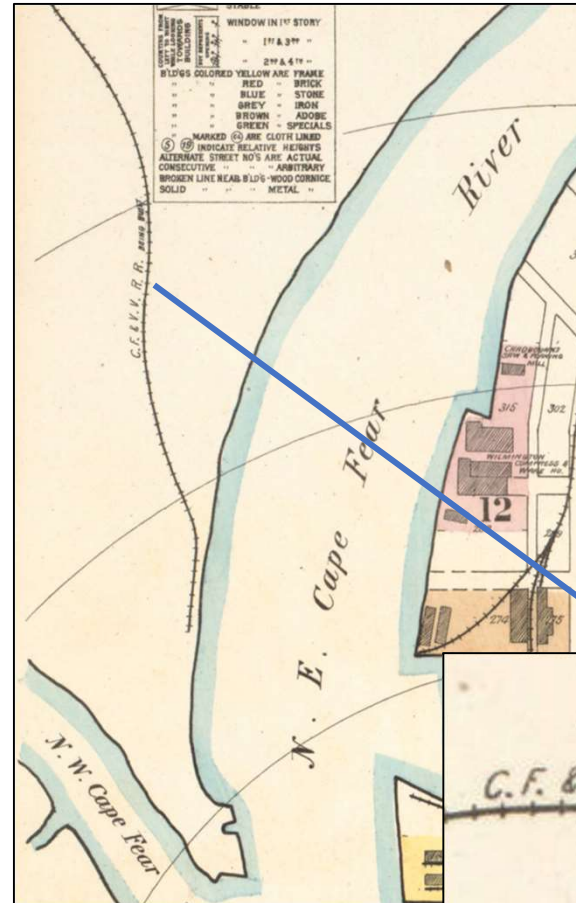
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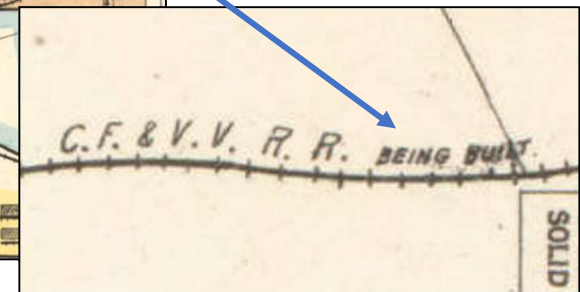
## 31NH895 – HISTORIC MAPS



1888 Geodetic Survey



1889 Sanborn Map  
railroad "being built"



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## • **SITE 31NH895**

- Reported to archaeological team by New Hanover County Sherriff Lt. W. L. "Lee" Garriss, Jr.
- Lt. Garriss identified the site in 2016 while doing hurricane damage clean up on the Sherriff's training facility property
- Lt. Garriss noted a brick rectangular ruin and recovered several artifacts from the site
  - Lt. Garriss had artifacts identified by history museum staff
  - Artifacts were also photographed by archaeology team and incorporated into the current site's catalog
- Current survey work relocated the site. Site is situated along two narrow rises above the tidal marsh
  - tall east-west berm at north end of site is USACE dike from 1950s
  - short north-south berm extending southward from dike related to historic road and later railroad



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## 31NH895 – 2016 ARTIFACTS



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## 31NH895 – 2016 ARTIFACTS



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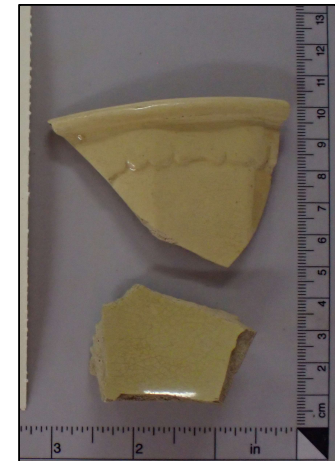
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## 31NH895 – 2016 ARTIFACTS



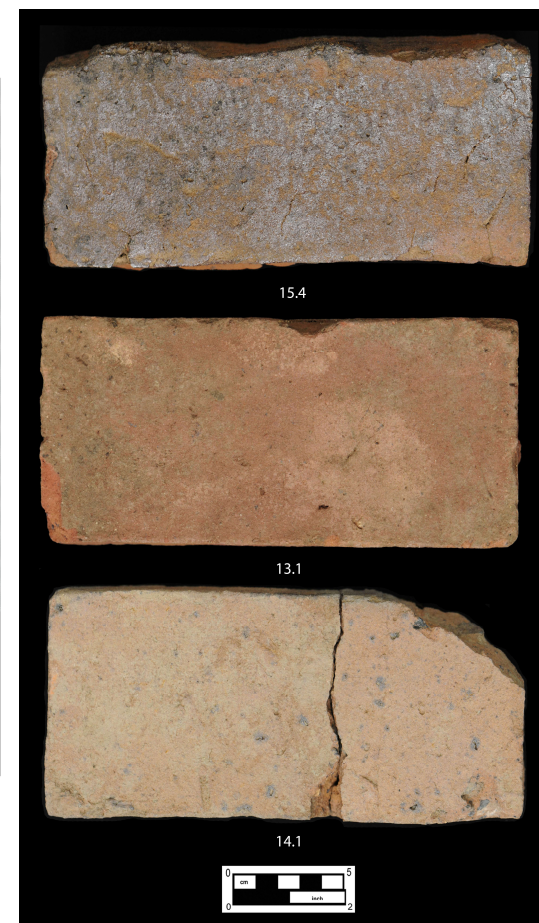
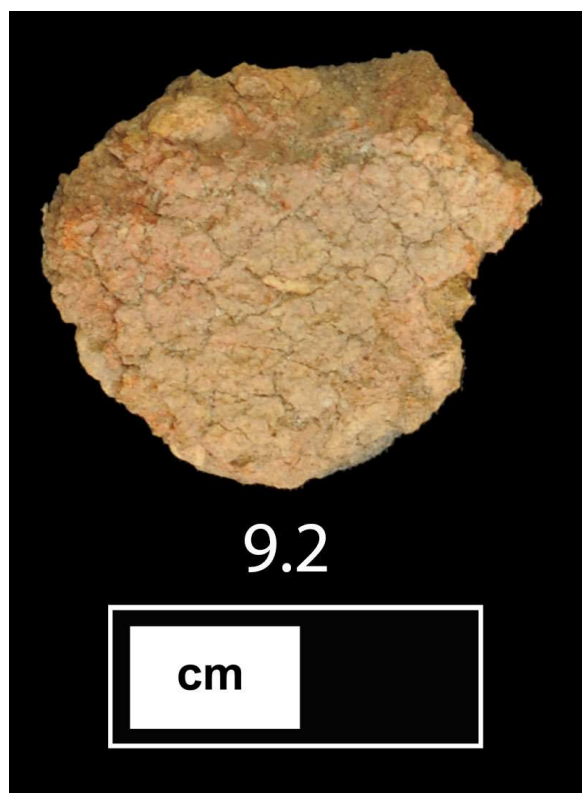
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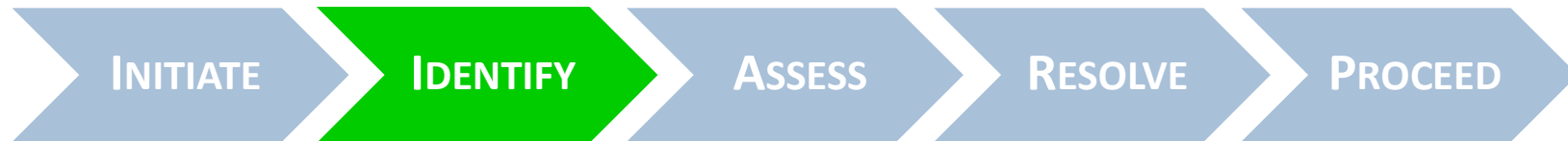
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## 31NH895 – 2021 ARTIFACTS





## • **SITE 31NH895 RECOMMENDATIONS**

- Artifacts from disturbed contexts – for example prehistoric ceramic from surface soil layer overlying stratum with historic items
- Did not relocate brick structure Lt. Garriss reported; only identified piles of bricks
- Site lacks intact deposits and does not exhibit the potential to provide significant data
- Site 31NH895 is recommended as not eligible for NRHP





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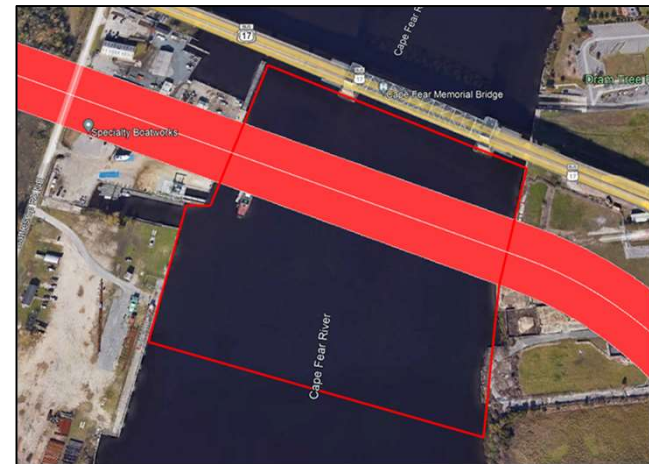
ASSESS

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## MARINE ARCHAEOLOGY

- Conducted to identify submerged archaeological sites (i.e., shipwrecks)
- Two bridge crossings of the Cape Fear River were surveyed
- The survey areas are large enough to include all potential construction impacts (i.e., barge anchoring)
- The marine remote sensing survey included:
  - Side-scan sonar (to identify surficial physical features)
  - Magnetometer (to identify metallic items)
  - Sub-bottom Profiler (to identify buried surfaces and objects)
  - GPS navigation (for locational positioning of remote sensing anomalies)



Southern Survey Area



Northern Survey Area



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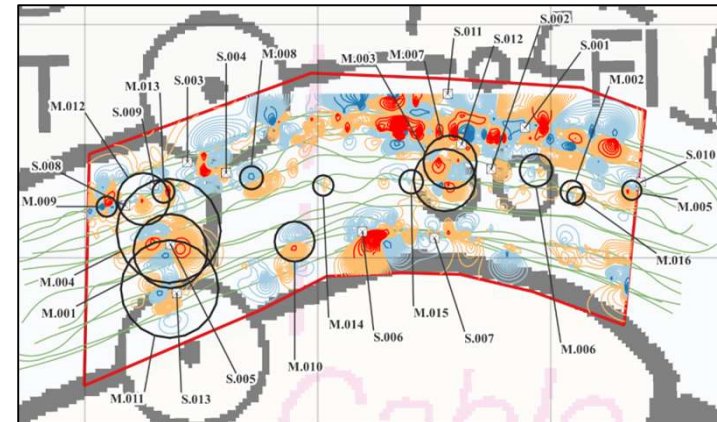
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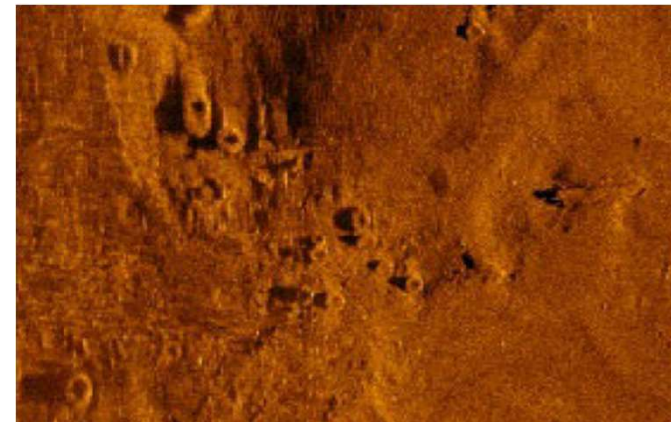
PROCEED

## MARINE ARCHAEOLOGY

- A boat towed equipment at 50-foot intervals across the survey areas
- Remote sensing data were processed in Hypack and SonarWiz software packages.
- The survey identified 24 magnetic anomalies (areas with a high magnetic response) and 25 side-scan targets (physical objects on the river bottom).
- These anomalies and targets consist of dock structures, trees, debris scatters, buried linear anomalies, and unknown buried anomalies not consistent with cultural resources
- None of the anomalies or targets represent shipwrecks or historic marine remains



Magnetic Anomalies



Side-scan sonar target S.0016 (tires)



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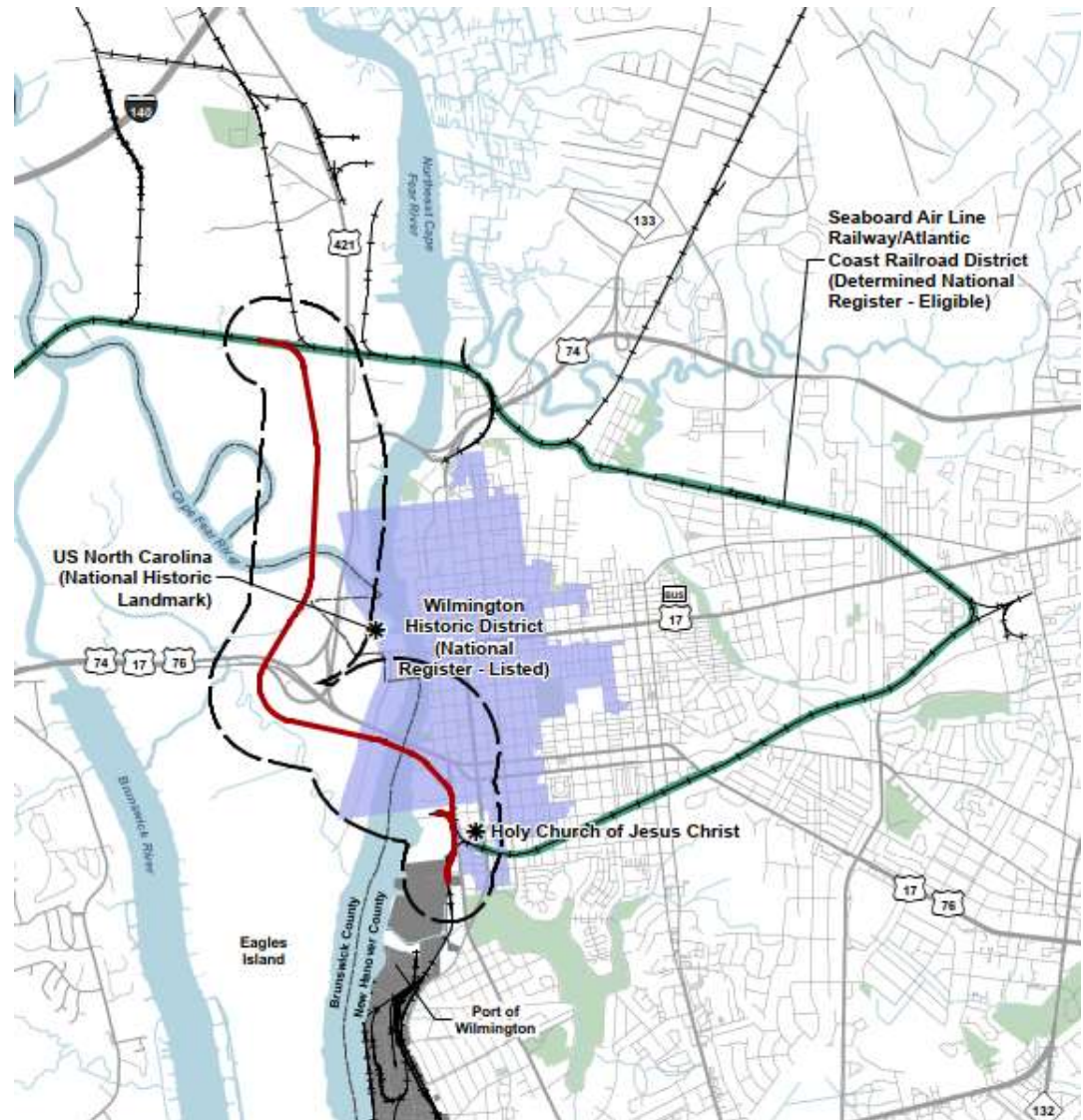
- **RECOMMENDATIONS**

- Former Holy Church of Jesus Christ recommended eligible for NRHP listing under Criterion C and Criterion Exception A
- Wilmington Historic District-Potential Expansion area: recommended that these resources should not be added to the Wilmington HD
- No new archaeological sites recommended eligible for NRHP listing



# HISTORIC PROPERTIES TO BE ASSESSED – PENDING SHPO CONCURRENCE

- Wilmington Historic District
- Holy Church of Jesus Christ
- USS North Carolina
- Seaboard Air Line Railway/Atlantic Coast Railroad District

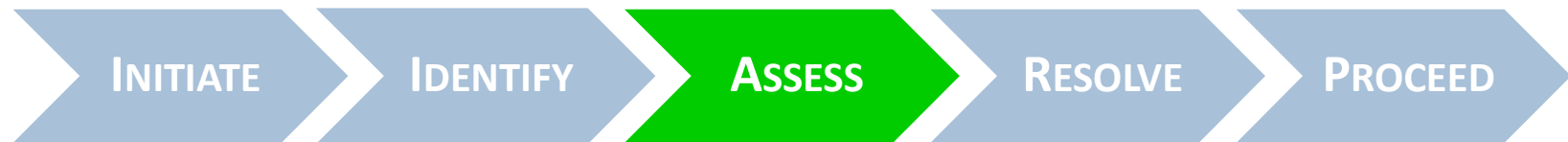


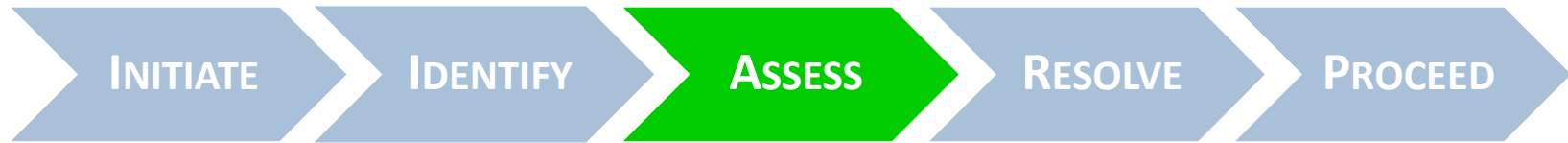
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# ASSESSMENT METHODOLOGY





- **ASSESS POTENTIAL EFFECTS**

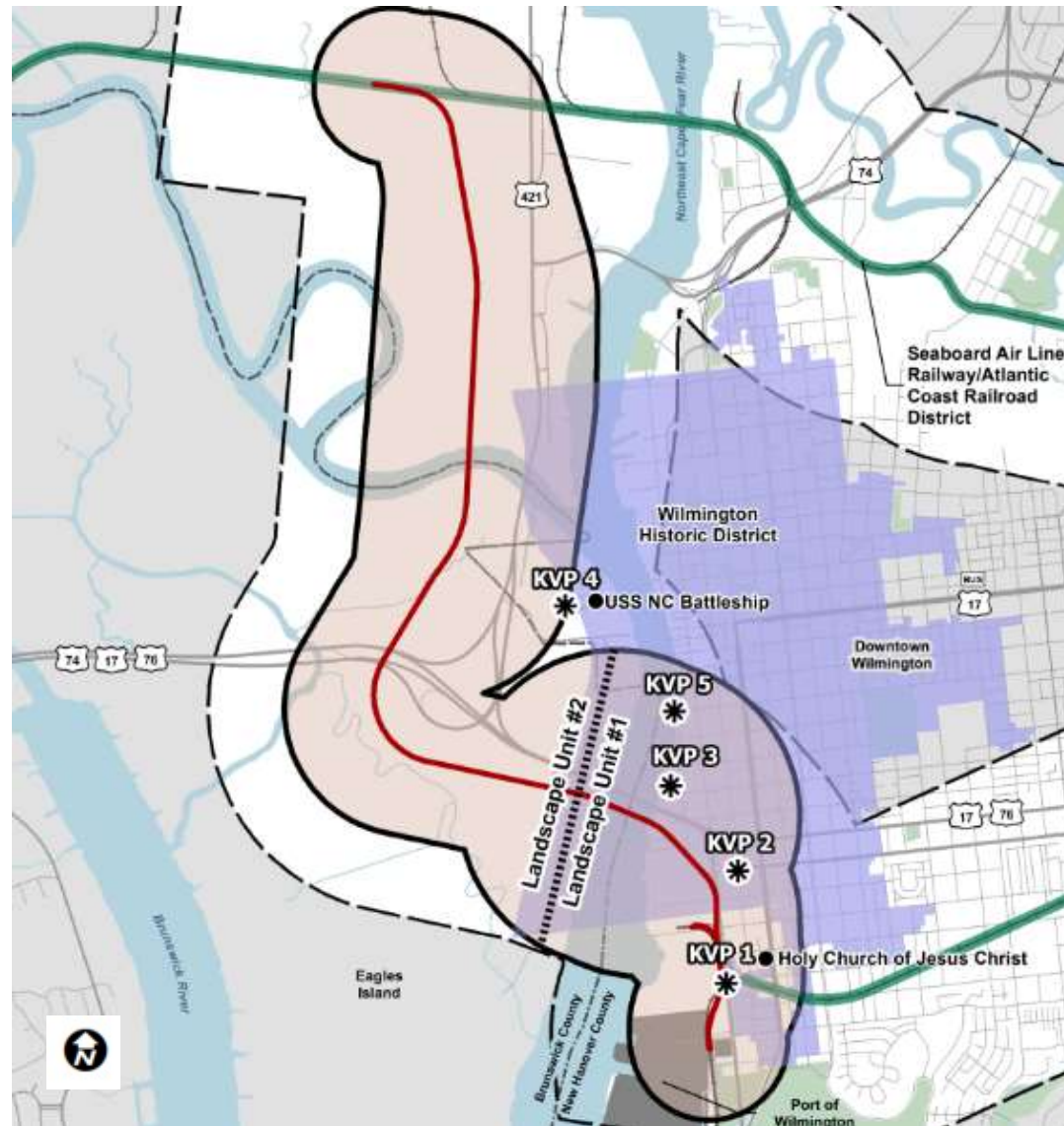
- Apply the criteria of adverse effect on historic properties See: 36 CFR 800.5[a]
- Development of visualizations to support effects assessment
- Consider views provided by consulting parties
- Propose finding:
  - no effect to historic properties
  - no adverse effect to historic properties
  - adverse effect to historic properties
    - If there is an adverse effect FRA continues consultation to avoid, minimize, or mitigate the effect
    - Develops a Programmatic Agreement or Memorandum of Agreement

Aspects of Integrity:  
Location  
Design  
Setting  
Materials  
Workmanship  
Feeling  
Association





# VISUALIZATIONS METHODOLOGY



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# EXAMPLE VISUALIZATION – DRAM TREE PARK

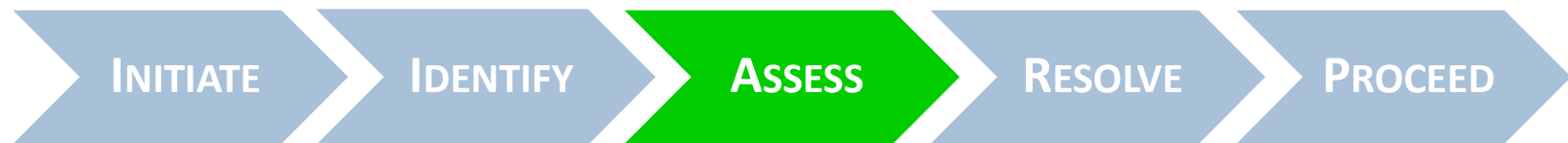


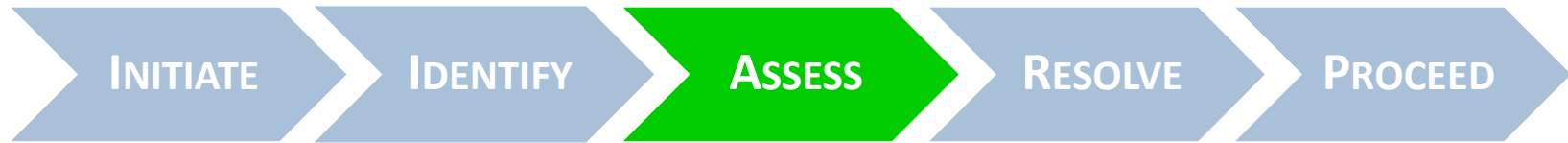
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# NEXT STEPS

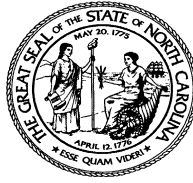




- **CONSULTING PARTY COMMENTS ON IDENTIFICATION OF HISTORIC PROPERTIES AND EFFECTS ASSESSMENT METHODOLOGY – DUE MARCH 9**
- **FRA WILL REVIEW CONSULTING PARTY COMMENTS, AND WILL SUBMIT THE PHASE I AND INTENSIVE-LEVEL SURVEY TO HPO FOR 30-DAY REVIEW**
- **ASSESS EFFECTS TO HISTORIC PROPERTIES**
- **NEXT CONSULTING PARTIES MEETING PLANNED FOR SPRING 2022 TO DISCUSS ASSESSMENT OF EFFECTS**







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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

March 4, 2022

Amanda Murphy, Deputy FPO  
Federal Railroad Administration  
1200 New Jersey Avenue Southeast  
Washington, DC 20003

[amanda.murphy2@dot.gov](mailto:amanda.murphy2@dot.gov)

RE: Wilmington Rail Realignment, Wilmington, New Hanover County, ER 19-2629

Dear Ms. Murphy:

This letter is to follow up on my comments during the February 23, 2022, meeting, concerning the above-referenced undertaking, and your request for them in writing. The comments were offered near the end of the meeting in response to a photograph used to suggest what visualizations might bring to the discussion of the project's effects. It showed the Cape Fear Memorial Bridge next to an image of a potential railroad bridge. Seeing the visualization, reminded me that there has been no evaluation of the bridge as a historic property and that the State Historic Preservation Office considers it eligible for listing in the National Register of Historic Places (NRHP). The following is to explain this oversight and offer reasons for our Determination of Eligibility.

The bridge is located within the Wilmington NRHP Historic District (NH0003), which was listed in 1974 and updated in 2003 with a period of significance up to 1971. The bridge, placed into service in 1969, is shown as a non-contributing resource in the nomination and update as it did not reach the fifty-year mark until 2019. The bridge's change in status would have come to light, had the extension of the Cape Fear Skyway from US 71 to US 421 (U-4738) not been placed on hold. Further, the North Carolina Department of Transportation is in the process of updating its inventory of historic bridges and will recommend that the bridge is eligible for the NRHP at the statewide level of significance as the only bridge of its type within North Carolina. Given these developments, we would anticipate its being included in the intensive architectural survey report and judged eligible.

Regarding the review of the intensive architectural survey, it was not our intention to short-circuit Mr. Brown's presentation of the results of his intensive evaluation efforts. We simply believed that a review of his report, submitted in accord with our Historic Structures Survey Report guidelines, and provided to the consulting parties would be adequate. However, we now understand that his intent was to provide the information and elicit any immediate reactions from the consulting parties. Thus, we look forward to receipt and review of the report and to the comments that will be offered by the other parties to the consultation.

We also wish to reiterate that while the remnants of dikes and other landforms in the open areas north of the USS North Carolina may not be considered significant archaeological features, there is value in evaluating whether they with other such features represent a historic landscape that may be eligible for NRHP listing.

As noted above, we look forward to receipt and review of the several reports prepared for the subject project as well as the comments of the consulting parties. Should there be any questions concerning the above, please contact me at 919-814-6579 or [renee.gledhill-earley@ncdcr.gov](mailto:renee.gledhill-earley@ncdcr.gov).

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.

Sincerely yours,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Aubrey Parsley, City of Wilmington  
Kevin Wright, Federal Railroad Administration  
Travis Gilbert, Historic Wilmington Foundation  
Terry Bragg, NCDCCR – NC Battleship  
Joanna Rocco, AECOM

[Aubrey.Parsley@wilmingtonnc.gov](mailto:Aubrey.Parsley@wilmingtonnc.gov)  
[kevin.wright@dot.gov](mailto:kevin.wright@dot.gov)  
[gilbert@historicwilmington.org](mailto:gilbert@historicwilmington.org)  
[terry.bragg@ncdcr.gov](mailto:terry.bragg@ncdcr.gov)  
[joanna.rocco@aecom.com](mailto:joanna.rocco@aecom.com)





U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

March 31, 2022

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

**RE: Section 106 Consultation: Wilmington Rail Realignment Project  
Terrestrial & Underwater Archaeological Surveys: Identification of Historic Properties  
New Hanover and Brunswick Counties, North Carolina (ER 19-2629)**

Dear Ms. Gledhill-Earley:

As part of on-going National Historic Preservation Act Section 106 review for the Wilmington Rail Realignment (WRR) Project, additional archaeological survey work was completed for the Preferred Alternative. The City of Wilmington is the project sponsor, and the Federal Railroad Administration (FRA) is the lead federal agency for Section 106 consultation. The purpose of this letter is to seek concurrence on the identification of historic archaeological properties for the Project.

The surveys resulted in: (a) two (2) terrestrial archaeological sites being documented (31NH686, 31NH895) and (b) 24 magnetic anomalies and 25 side-scan sonar targets being identified. The two terrestrial archaeological resources were not found to retain integrity and further work at them would not provide significant data pertaining to the prehistoric or historic past. The underwater survey data was processed and analyzed and none of the magnetic anomalies or side-scan sonar targets represent archaeological resources. Further, no subbottom paleoforms were identified to suggest buried archaeological deposits. FRA determined there are no underwater resources eligible for the National Register of Historic Places (NRHP) within the APE.

In addition, the comments in your letter dated March 4, 2022 regarding the ca. 1950s dike related to U.S. Army Corps of Engineers dredging spoil documented at 31NH895 was considered for NRHP eligibility as a landscape feature associated with those mid-20th century activities. The site does not retain the integrity necessary to be considered eligible for the NRHP under any of its criteria of significance. From a broader perspective, including outside the Project's Area of Potential Effects, the overall remnants of dredging activity in that area have been negatively impacted by development of the New Hanover County Sheriff's training facility, and further subjected to impacts by recent hurricanes, particularly hurricane Matthew in 2016. These significant alterations to the overall dredging landscape elements have resulted in a loss of integrity. While the remains of the dredging activity still can portray their location, the resource lacks setting, design, materials, workmanship, feeling, and association. FRA recommends that no further study is needed.

As part of our Consulting Party coordination, the Historic Wilmington Foundation submitted comments, in a letter dated March 9, 2022 from Mr. Travis Gilbert to the FRA, regarding additional investigations of archaeological site 31NH895. While the Historic Wilmington Foundation agreed that the site was not eligible for the NRHP and required no additional work; they suggested that the site be studied further by

Public Archaeology Corps. The FRA does not recommend further investigations since the Project is still in the early phases of development. Additionally, such work falls outside the scope of Section 106 and the purview of the FRA.

Please find enclosed copies of the archaeological report and site forms detailing the results of archaeological studies for the Project. In accordance with 36 CFR Part 800.4, FRA requests concurrence within 30 calendar days from the date on this letter with our determination that there are no known archaeological historic properties in the APE. Thank you for your continued cooperation on this important project.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Murphy', written in a cursive style.

Amanda Murphy  
Deputy Federal Preservation Officer  
Federal Railroad Administration

CC: Kevin Wright, Acting Supervisory Environmental Protection Specialist, FRA  
Aubrey Parsley, Director of Rail Realignment, City of Wilmington

Attachments: Terrestrial and Underwater Archaeological Survey for Wilmington Rail Realignment, City of Wilmington, Brunswick and New Hanover Counties, North Carolina

Digital site forms



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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

May 5, 2022

Amanda Murphy  
Deputy Federal Preservation Officer  
Federal Railroad Administration

[Amanda.murphy2@dot.gov](mailto:Amanda.murphy2@dot.gov)

RE: *Historic Structures Survey Report: Wilmington Rail Realignment, Wilmington, Brunswick and New Hanover Counties*, ER 19-2629

Dear Ms. Murphy:

Thank you for your April 1, 2022, letter concerning the above-referenced undertaking and providing a digital copy of the Historic Structures Survey Report. We received the required hard copy deliverables on April 5, 2022 and began our thirty-day review. Having completed that review, we provide the following comments.

We concur with the recommendations concerning the National Register of Historic Places (NRHP) eligibility that the:

- (former) Holy Church of Jesus Christ (NH3680) is eligible for listing in the NRHP under Criterion C and Criterion Consideration A.
- The resources within the Wilmington Historic District – Potential Expansion Area (NH3681) are not eligible for listing as outlined in the report.

We would also note that there are several items within the report that warrant attention and/or correction to meet our reporting standards. They are:

- Lack of a management summary, including a single listing of all the evaluated properties and their eligibility determinations.
- Language within the Recommendations Section (Section 4.0; p. 4-73) for the (former) Holy Church of Jesus Christ that needs editing. Some key words appear to be missing in the last sentence of the paragraph. Please review and revise to be in line with the eligibility recommendation.
- No mention of the Cape Fear/Wilmington Memorial Bridge (NH2326) although the parties had been made aware of our and NCDOT's considering it eligible for the NRHP by our March 10, 2022, email.



That the FRA did not give more consideration to Historic Wilmington Foundation's request/recommendation to reconsider the eligibility of Greenfield Lake and Gardens (NH1381) is disappointing. The determination that the area is not eligible for listing is based on a 2015 Historic Structures Survey Report for the Cape Fear Crossing project, the same report that did not evaluate the Cape Fear/Wilmington Memorial Bridge. Given the passage of seven years and our standard request for federal agencies to update their project records and findings after five years, we request that FRA reconsider the Foundation's request for an eligibility re-evaluation and determination.

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 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Aubrey Parsley, WRR  
Kevin Wright, FRA  
Joanna Rocco, AECOM

[aubrey.parsley@wilmingtonnc.gov](mailto:aubrey.parsley@wilmingtonnc.gov)  
[kevin.wright@dot.gov](mailto:kevin.wright@dot.gov)  
[Joanna.rocco@aecom.com](mailto:Joanna.rocco@aecom.com)



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 12, 2022

Renee Gledhill-Earley  
North Carolina State Historic Preservation Office  
4617 Mail Service Center  
Raleigh, NC 27609-4617

**RE:** Section 106 Consultation: Wilmington Rail Realignment  
Final Intensive-Level Historic Architectural Survey Report,  
Brunswick and New Hanover Counties, North Carolina (ER 19-2629)

Dear Ms. Gledhill-Earley:

Thank you for your May 5, 2022 letter commenting upon the initial submission of the above-referenced Historic Architectural Survey Report (Report) for the Wilmington Rail Realignment Project (Project). The purpose of this letter is to respond to your comments on the draft Report, provide copies of the final Report, and request concurrence on our final identification of architectural historic properties within the APE.

Comments on Report

- Added a management summary that includes a listing of the evaluated resources and their NRHP eligibility determinations;
- Amended the language of the Recommendation Section for the Church to clarify the NRHP-eligibility recommendation;
- Updated the survey numbers for the Church and WHD-Potential Expansion area to reflect new numbers assigned to them after our submittal of the initial report, and updated the name of the WHD-Potential Expansion area to match the one associated with its number.

Comments on Greenfield Lake and Gardens

You asked that FRA reconsider the Historic Wilmington Foundation's request for an eligibility reevaluation and determination of Greenfield Lake and Gardens (NH1381) (Greenfield). FRA finds Greenfield was determined to not be eligible for NRHP listing due to a loss of integrity. This determination is conveyed in a June 13, 2016 letter from your office to the North Carolina Department of Transportation. The letter was based upon an evaluation of the revised intensive-level 2016 "Historic Architecture Eligibility Evaluation Report for the Cape Fear Crossing, New Hanover and Brunswick County (STIP No. U-4738)." That report identifies the loss of integrity of East Lake Shore Drive and West Lake Shore Drive due to widening, installation of curbs, and construction of parking areas. It further notes the construction of many resources in Greenfield within the past 45 years, outside of its period of significance. These include the amphitheater stage house, band shell and restrooms (2008); bike path (1978); wooden bridges (1978); picnic pavilions (1978); fishing docks (ca. 1978); playgrounds (1998); skate park (2001); and tennis courts (2006). FRA finds all of these resources that affect the resource's integrity are still present today. For this reason, FRA finds that Greenfield is ineligible for NRHP because it does not retain sufficient overall integrity to support significance.

### Comments Cape Fear Memorial Bridge (Bridge)

In FRA's April 1, 2022 letter to your office, we noted that "Due to its design, the FRA has determined that the Cape Fear Memorial Bridge is eligible for NRHP listing under Criterion C, for embodying the distinctive characteristics of a type of construction." As discussed with you following your May 5<sup>th</sup> letter, survey and eligibility assessment of this Bridge was not part of the agreed to scope for the Intensive Level Architectural Survey. For this reason, the Bridge is not included in the Report. This letter and our April 1, 2022 letter constitutes FRA's determination that the Bridge is eligible for the NRHP under Criterion C.

### Seaboard Air Line Railway/Atlantic Coast Line Railroad (Beltline)

In a letter from FRA to your office dated November 17, 2020 for the Proposed Improvements to the CSX Railroad SE Line [the "Beltline"] Railroad and Crossings Project, FRA stated it considered the Beltline to be NRHP-eligible *for the purposes of that project*. In a December 15, 2020 letter to the FRA, your office concurred with the Beltline's eligibility. FRA will continue to treat this property as eligible for the purposes of the Wilmington Rail Relocation Project, however we ask that you please send us any information you have on why this property is eligible that will help inform our assessment of effect.

### Historic Property Identification

To confirm, FRA will assess effects to the following architectural historic properties within the Project APE in our upcoming Assessment of Effect Report: Wilmington Historic District, USS North Carolina Battleship Memorial State Historic Site, Seaboard Air Line Railway/Atlantic Coast Railroad District (Beltline), the former Holy Church of Jesus Christ, and the Cape Fear Memorial Bridge. FRA requests SHPO concurrence on the identification of architectural historic properties within 30 calendar days from the date on this letter. Per SHPO request, archaeological survey reports and findings will be presented in a separate submission. Please provide your response to me at: [Amanda.Murphy2@dot.gov](mailto:Amanda.Murphy2@dot.gov). If we do not receive a response within calendar 30 days, we will assume concurrence. Thank you for your continued cooperation on this important project.

Sincerely,



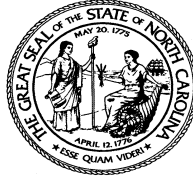
Amanda Murphy  
Acting Federal Preservation Officer  
Federal Railroad Administration

CC: Kevin Wright, Environmental Protection Specialist, FRA  
Aubrey Parsley, Director of Rail Realignment, City of Wilmington

### Attachments:

One hard copy and one digital copy of Final Intensive-Level Historic Architectural Survey Report, Brunswick and New Hanover Counties, North Carolina





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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

August 4, 2022

Amanda Murphy, Acting FPO  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

[Amanda.Murphy2@dot.gov](mailto:Amanda.Murphy2@dot.gov)

RE: Wilmington Rail Realignment, Final Intensive-Level Historic Architecture Survey Report,  
Brunswick and New Hanover Counties, ER 19-2629

Dear Ms. Murphy:

Thank you for your July 12, 2022, letter concerning the above-referenced report and our comments of May 5, 2022. Having reviewed the information provided by the Federal Railroad Administration (FRA), we provide the following comments.

We note and appreciate that the Final Intensive Level Historic Architecture Survey Report:

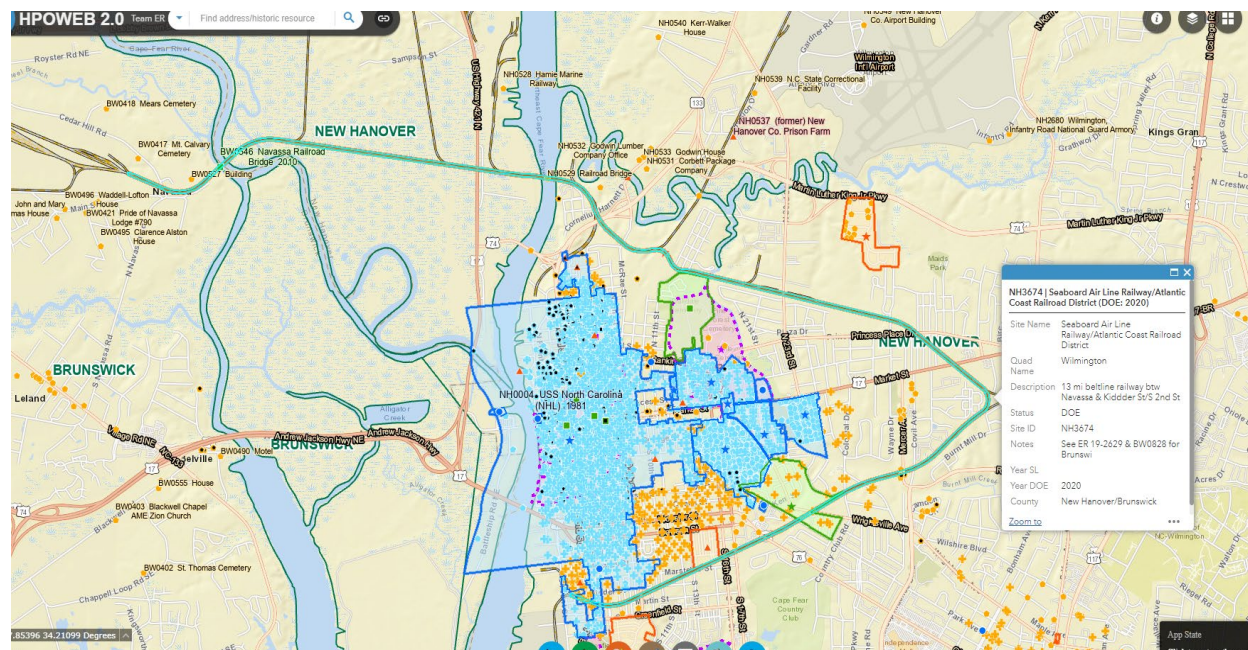
- Added a management summary that includes a listing of the evaluated resources and their National Register of Historic Places (NRHP) eligibility determinations.
- Amended the language of the Recommendation Section for the former Holy Church of Jesus Christ to clarify the NRHP-eligibility recommendation.
- Updated the survey numbers for the former Holy Church of Jesus Christ and Wilmington Historic District-Potential Expansion area to reflect the new numbers assigned to them after FRA's submittal of the initial report and updated the name of the Wilmington Historic District Potential Expansion area to match the one associated with its number.

Based on the reassessment of eligibility for the Greenfield Lake and Gardens (NH1381), we concur with FRA's finding that Greenfield is not eligible for listing in the NRHP as it no longer retains sufficient overall integrity to convey historical significance.

In response to your request that we provide additional information about our concurrence with FRA's earlier Determination of Eligibility for the Wilmington Beltline, we provide the following.

The North Carolina State Historic Preservation Office considers the **Seaboard Air Line Railway/Atlantic Coast Railroad Beltline with its connection to Navassa (NH3674)** (as shown on the map below) a linear historic district eligible for listing in the National Register of Historic Places under Criterion A for Transportation, Development, and Industry. The system through various mergers and consolidations provided trade and transportation routes mainly to southern and middle Atlantic seaboard states and early

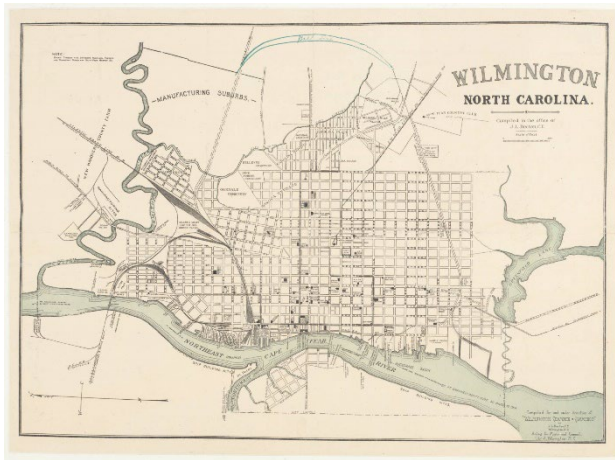
twentieth century cities and towns. These connections boosted regional economies and encouraged Wilmington's shipyards as well as other local and regional industries. The Seaboard Air Line Railway/Atlantic Coast Railroad Beltline contributed to the early 20th-century growth in Wilmington by providing trade links with major cities and stimulating local industrial and commercial enterprises through improved transportation services and passenger railways. Indeed, this historic district continues as a major factor in the economic wellbeing of the city and region.



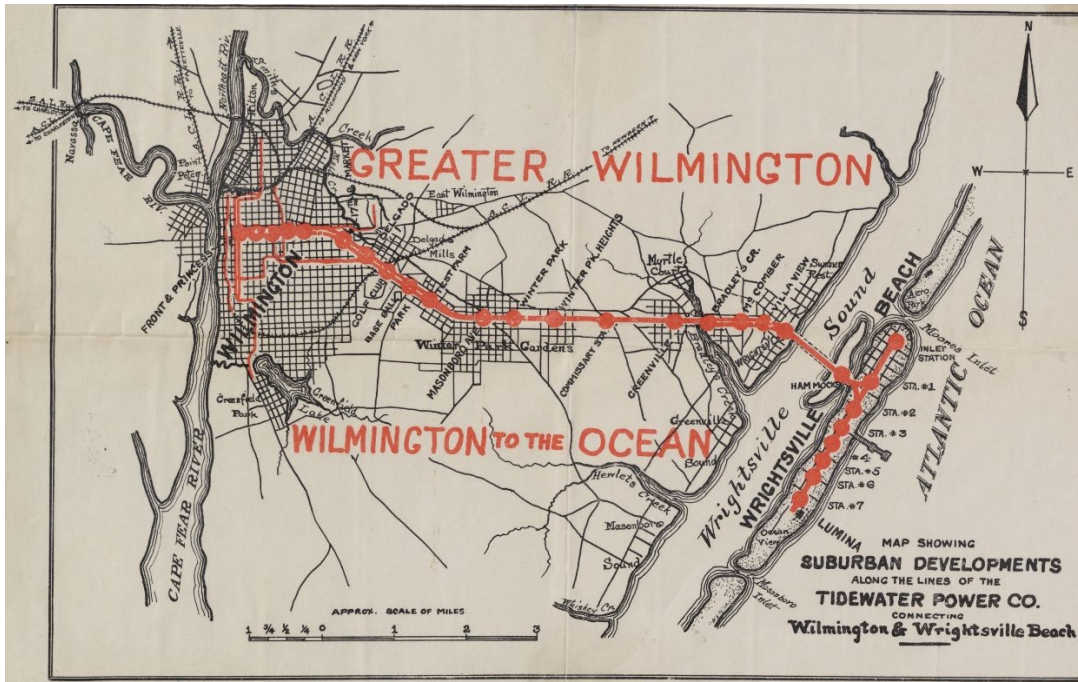
### NH3674 | Seaboard Air Line Railway/Atlantic Coast Railroad Historic District (DOE 2020) - in turquoise

As background to our 2020 concurrence with FRA, we provide the following.

1. A November 14, 1906 news item from the *Wilmington Messenger* describes construction of the southern section of the beltline and an issue with the crossing of the beltline with the electric car line at Delgado Mills in southeast Wilmington. The crossing was at what was formerly Colwell Avenue, which may have been the route of the trolley line to the beach. The article states that the beltline being constructed by ACL made use of parts of a previously built line that had been abandoned, and that work had started recently and would be completed once the crossing issue was resolved. It concludes, "The completion of the beltline will be a wonderful help to the wholesale merchants along Water Street" by improving the movement of freight cars around the city.
2. A map of Wilmington from the NC Maps website, undated but believed to be about 1918, shows the configuration of the railroad encircling Wilmington at that time, including the "Belt Line" (drawn and labeled in pencil on the far east side, at the top of the map). It largely follows the Beltline as it is today, with changes on the north side, mostly in removal of some track that extended into the north side of downtown to Water Street, and some realignment. (**Note:** The map is turned so east is at the top.)



3. A circa 1940 streetcar map that shows essentially the same configuration.



We also believe the Seaboard Air Line Railway/Atlantic Coast Railroad Beltline, with its bridges crossing the Cape Fear and Northeast Cape Fear and connecting with the Navassa Yard, retains integrity of setting/location, design, and materials, understanding that while tracks, crossties, signals, etc. are continuously replaced, they are essentially the same as those used in early construction and well into the twentieth century.

We understand and agree that FRA will assess effects to the following historic architectural properties within the Undertaking's Area of Potential Effects (APE).

- Wilmington Historic District,
- USS North Carolina Battleship Memorial State Historic Site
- Seaboard Air Line Railway/Atlantic Coast Railroad District (Beltline)
- former Holy Church of Jesus Christ, and
- Cape Fear Memorial Bridge.



We look forward to receipt of the revised archaeological survey report under separate cover.

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 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Wright, Kevin. FRA  
Aubrey Parsley, Wilmington  
Jessica Baldwin, Wilmington HPC  
Joanna Rocco, AECOM  
Travis Gilbert, HWF

[kevin.wright@dot.gov](mailto:kevin.wright@dot.gov)  
[Aubrey.Parsley@wilmingtonnc.gov](mailto:Aubrey.Parsley@wilmingtonnc.gov)  
[Jessica.Baldwin@wilmingtonnc.gov](mailto:Jessica.Baldwin@wilmingtonnc.gov)  
[Joanna.rocco@aecom.com](mailto:Joanna.rocco@aecom.com)  
[gilbert@historicwilmington.org](mailto:gilbert@historicwilmington.org)



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

August 10, 2022

Renee Gledhill-Earley  
North Carolina State Historic Preservation Office  
4617 Mail Service Center  
Raleigh, NC 27609-4617

**RE:** Section 106 Consultation: Wilmington Rail Realignment  
Terrestrial & Underwater Archaeological Surveys: Identification of Historic Properties,  
Brunswick and New Hanover Counties, North Carolina (ER 19-2629)

Dear Ms. Gledhill-Earley:

Thank you for your May 5, 2022 letter commenting on the initial submission of the above-referenced Archaeological Survey Report (Report) for the Wilmington Rail Realignment Project (Project). The purpose of this letter is to submit the final Report on terrestrial and marine archaeological survey and to provide a summary of the changes from its draft version.

Response to Comments on Terrestrial Archaeology

- Additional information added to the Report that explains the history of the area south of the Northwest Cape Fear River and Point Peter as well as the importance of the maritime trade that influenced the development of Eagles Island's eastern shoreline.
- Additional information added to the Report that references previous terrestrial archaeological work within one mile of the Project.
- In consultation with the SHPO and OSA during a meeting on June 10, 2022 it was agreed that access to the specific area of higher ground vegetation on Eagles Island noted in your May 5 letter is (a) generally inaccessible and (b) traditional shovel testing methods may not be adequate to evaluate the presence/absence of archaeological remains. Therefore, it was agreed this item would be best addressed at a later time in the design process but well in advance of construction to adequately address any findings. This commitment would be stated in the Environmental Assessment for the Project.

Response to Comments on Underwater Archaeology

- Additional information added to the Report detailing review of known shipwreck resources including NOAA's AWOIS and ENC databases and the Global Marine Wrecks Database.
- Additional information added to the Report on previous marine archaeological investigations and previously identified maritime archaeological sites.
- The revised Report contains avoidance buffers and recommendations for specific targets to have diver evaluation performed, as well as more descriptive information on why other targets should not have any diver evaluation performed. In consultation with OSA during a meeting on July 20, 2022, it was agreed the specific dive targets would include assessment of Targets N.2, N.3, and S.3, as these three targets were found to share some potential characteristics with other known and verified submerged resources. As discussed, and agreed to with OSA, the results of this investigation will be included in an addendum report and are not presented in this final Report.

Based on the findings presented in this Report, FRA finds that the two documented terrestrial archaeological resources (31NH686 and 31NH895) are not eligible for the NRHP. FRA also concurs with the Report that there are seven marine targets that may represent historic resources, and four of the marine targets will be avoided by design while three of the marine targets will receive diver evaluation as soon as possible (late-summer 2022). FRA requests SHPO concurrence with our findings. Please provide your response to me at: [Amanda.Murphy2@dot.gov](mailto:Amanda.Murphy2@dot.gov) within 30 calendar days of the date on this letter. Thank you for your continued cooperation on this important project.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Murphy'.

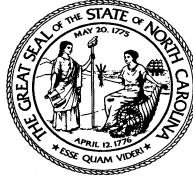
Amanda Murphy  
Acting Federal Preservation Officer  
Federal Railroad Administration

CC: Kevin Wright, Environmental Protection Specialist, FRA  
Aubrey Parsley, Director of Rail Realignment, City of Wilmington

Attachments:

One hard copy and one digital copy of Terrestrial & Underwater Archaeological Survey Report,  
Brunswick and New Hanover Counties, North Carolina





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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

September 14, 2022

Amanda Murphy  
Deputy Federal Preservation Officer  
Federal Railroad Administration

[Amanda.murphy2@dot.gov](mailto:Amanda.murphy2@dot.gov)

RE: Archaeological Report: *Terrestrial and Underwater Archaeological Survey for Wilmington Rail Realignment, Wilmington, Brunswick and New Hanover Counties*, ER 19-2629

Dear Ms. Murphy:

We have reviewed the above-referenced archaeological survey report, that presents AECOM, Inc's. archaeological investigations of a portion of the Wilmington Rail Realignment (WRR) project for which we received the initial draft on April 5, 2022. This report, which includes additions recommended by our office, contains additional background information concerning the historical context of the Wilmington area as it relates to the rail construction project as well as previous archaeological work that has taken place. In addition, the findings of the underwater remote sensing survey of the proposed rail crossings over the Cape Fear River were explored in much greater detail. AECOM, Inc. has produced a excellent report that is in keeping with the exceptional nature of the Eagles Island and Wilmington waterfront community that was the focus of their research.

As part of the report, recommendations were made concerning seven "Targets of Interest" recorded during the underwater remote sensing survey. These targets produced magnetic anomalies or sonar images that, while not confirmed, were consistent with those produced by known shipwrecks. These targets, four in the northern crossing and three in the southern crossing, were each recommended for avoidance by a 100-foot buffer.

While such a recommendation may be appropriate for terrestrial sites, it is our opinion that all seven "Targets of Interest"/sites should be evaluated for their National Register eligibility at this stage. Given that construction plans are only for 30% at this point as well as the potential for future changes in design and construction techniques, the seven sites should be identified through targeted diving and conducting additional archaeological background information on the sites to prepare a Determination of Eligibility for each. Minus such an evaluation, it appears difficult to accurately assess the effects of the proposed undertaking. By delaying the determinations of eligibility for the seven sites, the parties could well be confronted with having to do the additional work under tight deadlines, at additional costs, and with limited possibilities to adjust the plans to avoid adverse effects to eligible properties.

We request that AECOM submit a research proposal for the targeted diver investigations, the project goals, methodology, and crew experience in assessing underwater archaeological sites. While a State ARPA or

NCDNCR Underwater Research Permit are not typically required for compliance projects, we do ask that a formal research proposal be submitted to minimize the need for follow-up fieldwork. This proposal should be submitted early enough to allow for review and comment prior to the beginning of the fieldwork.

The results of the diving assessment should be presented as a section of the overall, formatted archaeological report instead of as a target diving addendum.

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 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Aubrey Parsley, WRR  
Kevin Wright, FRA  
Mathew Jorgenson, AECOM

[aubrey.parsley@wilmingtonnc.gov](mailto:aubrey.parsley@wilmingtonnc.gov)  
[kevin.wright@dot.gov](mailto:kevin.wright@dot.gov)  
[matt.jorgenson@aecom.com](mailto:matt.jorgenson@aecom.com)



U.S. Department  
of Transportation

**Federal Railroad  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

March 22, 2023

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

**RE: Section 106 Assessment of Effects for Architecture/History Historic Properties Report,  
Wilmington Rail Realignment, Brunswick and New Hanover Counties (ER 19-2629)**

Dear Ms. Gledhill-Earley:

By way of this letter, the U.S. Department of Transportation's (DOT) Federal Railroad Administration (FRA) is continuing consultation under Section 106 of the National Historic Preservation Act (NHPA) (36 CFR § 800.3). The Project, referred to as the Wilmington Rail Realignment, involves realigning an existing CSX Transportation (CSXT) freight rail line that traverses through the City of Wilmington ("City") limits as well as unincorporated areas of Brunswick and New Hanover counties to a new bypass route. The Project is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR Part 800 (Section 106). Our office issued prior letters initiation consultation with your office and related to the identification and evaluation efforts for historic properties.

Currently, there is no construction funding for the Project; however, FRA is conducting Section 106 consultation because the agency may provide such funding in the future. Should the Project receive future federal funding for construction, the intent is that FRA or any other lead federal agency could rely on the environmental analysis and Section 106 consultation that has been conducted at this preliminary engineering stage.

Effects to archaeological historic properties will be documented in a separate report and FRA will issue its overall findings of effect to all historic properties for the Project in a subsequent findings letter.

#### **Project Background and Description**

Freight rail traffic between the Port and Davis Yard in the Town of Navassa currently travels through the City along the existing Transportation Inc (CSX) line, commonly referred to as the "Beltline." This freight rail line was historically part of the Seaboard Air Line Railway/Atlantic Coast Railroad. The Preferred Alternative for the Project includes construction of a new rail bypass west of the City that provides for a more direct connection between the Port of Wilmington Port (Port) and Davis Yard.



The purpose of the Project is to improve safety, regional transportation mobility, and freight rail operations, while also improving resiliency from storms, regional travel reliability, and operational fluidity of the sole freight rail route connecting the Port and southeastern North Carolina with the national freight rail network.

### **Consulting Party Outreach**

FRA initiated Section 106 consultation with the NCHPO and the North Carolina Office of State Archaeology (OSA) in a letter dated February 19, 2021. On February 22, 2021, FRA, in cooperation with the City, also invited the NCHPO and OSA to become Participating Agencies in the development of the EA under NEPA. FRA and the City subsequently worked with the NCHPO to identify Consulting Parties to the Section 106 consultation process: the City, the Historic Wilmington Foundation, the North Carolina Commission of Indian Affairs, the US Coast Guard, the US Army Corps of Engineers, the USS North Carolina Commission, the Surface Transportation Board/Office of Environmental Analysis (STB/OEA), the New Hanover County Soil and Water Conservation District, and the Gullah Geechee Cultural Heritage Corridor Commission. Formal acceptance was received from the Historic Wilmington Foundation, the USS North Carolina Commission, the STB/OEA, and the New Hanover County Soil and Water Conservation District.

FRA also invited the following federally recognized Indian tribes to participate in consultation by separate letter:

- Catawba Indian Nation
- Lumbee Tribe of North Carolina
- Tuscarora Nation
- Waccamaw-Siouan Indian Tribe

The Catawba Indian Nation was the only tribe to respond. They noted that they had no immediate concerns regarding traditional properties, sacred sites or Native American archaeological sites within the boundary of the APE. However, they request that they be notified if Native American artifacts and/or human remains are located during the ground disturbance phase of this project. They did not accept the invitation to be a Consulting Party.

FRA and the City jointly conducted two Section 106 Consulting Party meetings, the first on November 17, 2021 and the second on February 23, 2022. It is anticipated the next Consulting Party meeting will occur next month.

### **Area of Potential Effects**

The Area of Potential Effects (APE), as defined in 36 CFR Part 800.16(d), is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The APE consists of the area where the Project has the potential to cause effects on historic properties. FRA delineated the APE to reflect the nature, scale, and location of the entire Project. FRA initially established an APE that extended 0.25 miles on either side of the centerline of the Preferred Alternative. Based on feedback from NCHPO at the November 17, 2021, Consulting Party meeting, FRA increased the APE to 0.5 miles on either side of the proposed bridge’s centerline as well as a one-mile buffer around the towers of the proposed southerly crossing of the Cape Fear River to account for potential visual effects from the height of the proposed rail bridge (Attachment 1).

### **Identification of Architecture/History Historic Properties**

Section 106 regulations define a historic property as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in” the NRHP. FRA and the City, with the support of AECOM, identified architecture/history historic properties within the APE, in consultation with the NCHPO and the Consulting Parties. AECOM conducted reconnaissance- and intensive-level field surveys and reported upon them. FRA submitted an initial Reconnaissance-Level Historic Architectural Survey Report to the NCHPO for review on July 27, 2021, and the final Intensive-Level Historic Architectural Survey Report to the NCHPO on July 12, 2022. The final submittal identified five architecture/history historic properties within the APE: the NRHP-listed Wilmington Historic District; the NRHP-listed USS North Carolina Battleship Memorial Site (Battleship), which is also a National Historic Landmark (NHL); the Seaboard Air Line Railway/Atlantic Coast Railroad District (Beltline District), which is assumed eligible for the purposes of this Project only; the NRHP-eligible Holy Church of Jesus Christ; and the NRHP-eligible Cape Fear Memorial Bridge (Memorial Bridge). On August 4, 2022, the NCHPO agreed by letter with the FRA’s determinations of eligibility for architecture/history properties.

### **Assessment of Effects for Architecture/History Historic Properties**

In accordance with 36 CFR Part 800.5, FRA finds that the proposed Project will have **No Adverse Effect** on architecture/history historic properties. No historic properties will be destroyed, moved, neglected, repaired or rehabilitated, or have a change of use. The Project will not diminish the seven aspects of integrity identified by the NRHP—location, design, setting, materials, workmanship, feeling, and association—of architecture/history historic properties. The FRA made the following additional findings regarding potential visual, noise, and vibration effects for the architecture/history historic properties within the APE. See the *Wilmington Rail Realignment Section 106 Assessment of Effects for Architecture/History Historic Properties* report submitted with this letter for additional details on the analysis of effects (Attachment 2).

#### Wilmington Historic District

The Project construction, including the entirety of the bridge over the Cape Fear River, will occur within the boundaries of the Wilmington Historic District, but the Project will not demolish, destroy, or move any contributing resources to the district. Because the Beltline traverses the Wilmington Historic District, it can be predicted that the Wilmington Historic District would experience an increase in noise by up to 10 percent due to the increase in operations and speed under the future No Build conditions. For the Preferred Alternative, the increase in rail traffic would be rerouted to the new bypass. This would introduce noise impacts at residential properties near the wye junction that abuts the future rail line due to the sounding of warning horns along South Front Street. Twelve out of the 2,530 contributing elements to the Wilmington Historic District were identified as being impacted by increased noise in the area along South Front Street. Additionally, noise and vibration from impact devices such as pile drivers could also affect residences farther away along the current Beltline corridor; however, these impacts would be temporary, sporadic, and variable throughout the duration of the construction period. Construction activities are not predicted to exceed the Federal Transit Administration ‘daytime’ or ‘nighttime’ noise impact criteria at any of the contributing elements to the Wilmington Historic District. The additions of the rail line and of the proposed rail bridge will have an overall minor visual effect to the Wilmington Historic District. The Project will not introduce visual and atmospheric elements that diminish the integrity of the historic property’s significant historic features. FRA finds that the Project will not adversely affect the Wilmington Historic District.

USS North Carolina Battleship Memorial Site (Battleship)

The towers of the proposed bridge will be almost imperceptible on the horizon to the southeast of the Battleship due to distance, their location beyond (south of) the Cape Fear Memorial Bridge, and their height, which is lower than those of the Memorial Bridge. The proposed rail line will also not be visible due to distance and tree coverage. The Project will not change the physical features within the property's setting that contributes to its historic significance or introduce visual and atmospheric elements that diminish the integrity of the historic property's significant historic features; therefore, the Project will not adversely affect the Battleship's integrity of setting, feeling, and association. FRA finds that the Project will not adversely affect the Battleship.

Beltline District

The proposed rail bridge and the rail line on the west side of the Cape Fear River will not be visible from the Beltline District. On the east side of the Cape Fear River, a small portion of the new line running adjacent to South Front Street between Marstellar Street and Laughing Oak Lane will be visible from within the Beltline District's boundary. However, most of the Project work will be constructed along South Front Street along portions of the Beltline that are not included within the Beltline District. Since no Project elements will be visible from the Beltline, the Project will not have a visual effect upon the Beltline's integrity of location, design, setting, materials, workmanship, feeling, and association. FRA finds that the Project will not adversely affect the Beltline District.

Holy Church of Jesus Christ

The top of the east tower of the proposed rail bridge would be located more than 3,000 feet northwest of the church's NRHP-eligible boundaries. Three blocks of residential and industrial development, two largely vacant lots, and mature trees obscure the bridge site from the church. No part of the bridge would be visible from the church at any time of the year. At its closest point, the rail line portion of the Project will run about 700 feet west of the church, to the west of South Front Street. Rail traffic will be distant, but partially visible, from the northern edge of the church, looking west. The visible portion of the proposed rail line will parallel the line that has run along and west of South Front Street since the late nineteenth century. This rail line was a fixture when the church was built and has continued to be so to the present. The proposed new bridge will not be visible from the church, but a small portion of the proposed rail line will be visible in the distance from the northern edge its NRHP-eligible boundary. That portion of the rail line will run along or immediately adjacent to the Beltline, a historic rail corridor that continues to carry trains. Trains remain active here and will continue to run along South Front Street under the Build Alternative. As no new visual element will be introduced, the Project will not have a visual effect upon the Church's integrity of setting, feeling, and association. FRA finds the Project will not adversely affect the Holy Church of Jesus Christ.

Memorial Bridge

The Memorial Bridge is significant for its notable engineering features under NRHP Criterion C. These features are its through-truss, vertical lift span; the two steel towers upon which that span can be raised and lowered; the wide concrete piers that support the towers; and the cantilevered extensions beyond both towers that hold traffic control gates and parking platforms for the bridge tender and work vehicles. The approaches beyond these elements are constructed in standard NCDOT fashion for the time. They are not distinctive characteristics of the lift-bridge's notable type of construction. The boundary for the Memorial Bridge are delineated by its notable engineering features (lift span, steel towers, concrete piers, cantilevered extensions) and its approaches, which are its key physical features. Due to the importance of these engineering features,



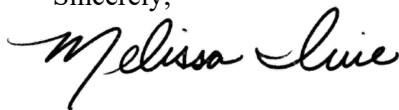
the retention of location, design, material, and workmanship are critical to its retention of significance. Further, the Memorial Bridge will also continue to cross the Cape Fear River, as it was intended to; therefore, the integrity of its feeling and association will also remain intact even if its setting is altered. The Memorial Bridge was erected within an industrial environment to its immediate north and south on both banks of the Cape Fear. When it was constructed, rail lines on the east side of the river extended up to either side of its eastern approach span. The proposed new bridge and rail line will not change the character of the Memorial Bridge's use or of its physical features that contribute to its historic significance. While the Project will introduce a new element in the bridge's setting, based on the property type, the physical features of its setting are less important than other aspects of integrity and will not introduce a visual element that will diminish the integrity of the historic property's significant historic features. The proposed line and bridge will therefore not alter the characteristics of the Memorial Bridge that qualified it for NRHP eligibility in a manner that would diminish its NRHP integrity of location, design, setting, materials, or workmanship, and, by extension, its integrity of feeling and association. FRA finds that the Project will not adversely affect the Memorial Bridge.

**Finding of Effect to Architecture/History Historic Properties**

FRA herein determines that the Project as currently proposed will not adversely affect the architecture/history historic properties within the Project's APE. Effects to archaeological historic properties will be documented in a separate report and FRA will issue its overall findings of effect to all historic properties for the Project in a subsequent findings letter.

FRA requests your response and seeks your concurrence within 30 days of receipt of this letter. Please e-mail your response to Kristen Zschomler, Environmental Protection Specialist at [kristen.zschomler@dot.gov](mailto:kristen.zschomler@dot.gov). If you have any questions or need additional information about this undertaking, please contact Ms. Zschomler. Thank you for your cooperation on the Project.

Sincerely,



Melissa Ivie  
Deputy Federal Preservation Officer  
Federal Railroad Administration

**Enclosures:**

Attachment 1: Figure of Area of Potential Effects

Attachment 2: Wilmington Rail Realignment Section 106 Assessment of Effects for Architecture/History Historic Properties (digital and hard copy)

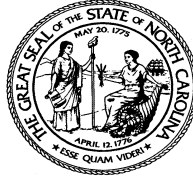
**cc:**

Diana Wood – Surface Transportation Board

Travis Gilbert – Historic Wilmington Foundation

Evan Folds – New Hanover County Soil & Water Conservation District

Captain Terry Bragg - USS North Carolina Battleship Commission



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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

June 30, 2023

Melissa Ivie  
Deputy Federal Preservation Officer  
Federal Railroad Administration

[Melissa.Ivie@dot.gov](mailto:Melissa.Ivie@dot.gov)

Re: Revised Report (May 2023) for Terrestrial and Underwater Archaeological Surveys, Wilmington Rail Realignment and Right of Way Use P-5740, New Hanover County, ER 19-2629

Dear Ms. Ivie:

Thank you for transmitting the archaeological report for the above-referenced undertaking that we received on May 31, 2023. Having reviewed the report, which meets our standards and those of the Department of the Interior, we offer the following comments.

The archaeological survey resulted in the following:

- The terrestrial survey revisited one previously recorded site and identified one new archaeological site. Site 31NH686, originally defined as a 20th century railroad causeway and turntable, was revisited during this project.
- Site 31NH895 is a newly identified 19th century domestic scatter and 20th century railroad causeway with an isolated prehistoric component.
- Sites 31NH686 and 31NH895 are recommended as not eligible for the National Register of Historic Places (NRHP). No further work is recommended at these two sites.
- The underwater survey identified a total of 46 magnetic anomalies, 25 side-scan sonar targets, and no sub-bottom, paleo features. Correlated datasets resulted in the identification of seven targets, N.1-N.4 and S.1-S.3, which may represent submerged cultural resources.
- These seven targets were investigated by AECOM scientific divers in March 2023. The likely sources for all seven targets were determined to be either modern debris or natural features on the riverbed.
- All seven targets do not meet criteria to be considered archaeological or historic in nature. No further work is recommended at any of the seven identified marine archaeological targets.

We agree with the Federal Railroad Administration's (FRA) recommendation that sites 31NH686 and 31NH895 are not eligible for the NRHP, that no further work is recommended at these two sites, and that no further work is recommended at any of the seven identified marine archaeological targets either. Based on the information provided, we concur with the FRA's finding that no historic resources are present within the archaeological APE for the project's two river crossings. As noted in your letter, we are awaiting the information about the architecture-history assessment of effects report and other information requested at the April 20, 2023, meeting before offering further comments on those 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 919-814-6579 or [environmental.review@ncdcr.gov](mailto:environmental.review@ncdcr.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Kristen Zscholmer, FRA  
Aubrey Parsley, Wilmington/Rail Realignment  
Jessica Baldwin, Wilmington HPC  
Alan Tabachnick, FPO/STB  
Evan Folds, New Hanover/Soil & Water Conservation  
Capt. Terry Bragg, USS NC Battleship Commission  
Travis Gilbert, Historic Wilmington Foundation  
Joanna H. Rocco, AICP

[Kristen.zscholmer@dot.gov](mailto:Kristen.zscholmer@dot.gov)  
[Aubrey.Parsley@wilmingtonnc.gov](mailto:Aubrey.Parsley@wilmingtonnc.gov)  
[Jessica.Baldwin@wilmingtonnc.gov](mailto:Jessica.Baldwin@wilmingtonnc.gov)  
[Alan.tabachnick@stb.gov](mailto:Alan.tabachnick@stb.gov)  
[evan@beagriculture.com](mailto:evan@beagriculture.com)  
[terry.bragg@ncdcr.gov](mailto:terry.bragg@ncdcr.gov)  
[gilbert@historicwilmington.org](mailto:gilbert@historicwilmington.org)  
[Joanna.rocco@aecom.com](mailto:Joanna.rocco@aecom.com)





U.S. Department  
of Transportation

1200 New Jersey Avenue, SE  
Washington, DC 20590

**Federal Railroad  
Administration**

July 3, 2023

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

**RE: Section 106 Assessment of Effects for Architecture/History Historic Properties Report and Finding of Effect for the Project, Wilmington Rail Realignment, Brunswick and New Hanover Counties (ER 19-2629)**

Dear Ms. Gledhill-Earley:

The Federal Railroad Administration (FRA) is providing financial assistance to the City of Wilmington (City) to complete the preliminary engineering and environmental process for the proposed Wilmington Rail Realignment Project (Project). Funding for final design and construction has not been identified.

The Project is an undertaking subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations 36 CFR Part 800 (Section 106). FRA initiated Section 106 consultation with the North Carolina State Historic Preservation Office (NCHPO) and the North Carolina Office of State Archaeology (OSA) in a letter dated February 19, 2021. The purpose of this letter is to continue Section 106 consultation for the Project and seek your concurrence with FRA's findings of effects for the Project.

**Project Background and Description**

Freight rail traffic between the Port and Davis Yard in the Town of Navassa currently travels through the City, along the existing Transportation Inc (CSX) line, commonly referred to as the "Beltline." The Preferred Alternative is the construction of a new rail line to bypasses the City to provide for a more direct connection between the Port and Davis Yard. The purpose of the Project is to improve safety, regional transportation mobility, and freight rail operations, while also improving resiliency from storms, regional travel reliability, and operational fluidity of the sole freight rail route connecting the Port of Wilmington (Port) and southeastern North Carolina with the national freight rail network.

**Area of Potential Effects and Identification of Historic Properties**

Defining of the Project's Area of Potential Effects (APE) and the identification of historic properties is complete, as documented in letters and supporting reports from our agency dated July 27, 2021 (Identification of Known and Potential Historic Properties); April 6, 2022 (Archaeology and Historic Structures Survey results) and July 12, 2022 (Final Historic Structures Survey results); and concurrence from your office on May 5, 2022 (Terrestrial Archaeology and Historic Structures Survey results), and August 4, 2022 (Final Architecture/History survey results). FRA's last determination that there were no underwater archaeological sites that are historic properties was documented in a letter dated May 15, 2023, with hard copy submittal on May 24, 2023, that was concurred upon by your office June 30, 2023.

As per our previous correspondence and in consultation with your office and the consulting parties, the identified historic properties within the Project APE therefore are the Wilmington Historic District, the

USS North Carolina Battleship Memorial Site (Battleship), the Beltline District, the Holy Church of Jesus Christ, and the Cape Fear Memorial Bridge.

### **Consulting Party Outreach**

As mentioned above, FRA initiated Section 106 consultation with the NCHPO and the North Carolina OSA in a letter dated February 19, 2021. FRA and the City subsequently worked with your office to identify potential consulting parties to the Section 106 consultation process which consisted of the City of Wilmington, the Historic Wilmington Foundation, the North Carolina Commission of Indian Affairs, the U.S. Coast Guard, the New Hanover County Soil and Water Conservation District, and the Gullah Geechee Cultural Heritage Corridor Commission. Formal acceptance of consulting party status was received from the Historic Wilmington Foundation, the USS North Carolina Commission, and the New Hanover County Soil and Water Conservation District.

FRA also invited the following federally recognized Native American tribes to participate in consultation by separate letter dated July 29, 2021.

- Catawba Indian Nation
- Lumbee Tribe of North Carolina
- Tuscarora Nation
- Waccamaw-Siouan Indian Tribe

The Catawba Indian Nation was the only tribe to respond. They noted that they had no immediate concerns regarding traditional properties, sacred sites, or Native American archaeological sites within the boundary of the APE; however, they requested that they be notified if Native American artifacts and/or human remains are located during the ground disturbance phase of this project. They did not accept the invitation to be a Consulting Party. Since the archaeological survey work for the Project did not identify any Native American-related properties, FRA has not re-initiated consultation with the identified federally recognized tribes.

On February 22, 2021, FRA invited the NCHPO and OSA, along with the U.S. Army Corps of Engineers (USACE) and the Surface Transportation Board/Office of Environmental Analysis (STB/OEA) to become Participating Agencies in the development of an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA). The USACE and STB recognized FRA as the lead federal agency for the Project under NEPA but have not commented on if they will recognize FRA as the lead federal agency under Section 106. **Via copy on this letter, we invite the USACE and STB to notify our office in writing if they wish to recognize FRA as the lead federal agency under Section 106 for the Project, thereby fulfilling the collective responsibilities under Section 106.** If USACE and STB do not designate FRA as the lead Federal agency, they will remain individually responsible for their compliance with this 36 CFR 800.

### **Consulting Party Meetings**

FRA and the City jointly conducted three Section 106 consulting party meetings: November 17, 2021; February 23, 2022; and April 20, 2023. The April 20, 2023, meeting focused on receiving consulting party comments on FRA's assessment and finding of effects to architecture-history historic properties based on our finding letter dated March 21, 2023. Your office and the consulting parties requested additional information. FRA determined that your office and the consulting parties did not need to respond to the March 21, 2023, letter and that FRA would submit an updated findings of effects letter with the requested information and addressing the concerns raised about potential effects to the Wilmington Historic District and the Memorial Bridge.

This letter, therefore, documents FRA's consideration of your comments from that meeting in the finding of effects and transmits the additionally requested information, consisting of the *Revised Wilmington Rail*

*Realignment Section 106 Assessment of Effects for Architecture/History Historic Properties* (Revised AOE Report) prepared by AECOM Technical Services, Inc. (AECOM) (Attachment 1); the 30% Design Plan Progress Prints (Attachment 2); larger print outs of the Project Visualizations (Attachment 3); and the Noise and Vibration Technical Memorandum (Attachment 4). In addition, we have enclosed the consulting party meeting summary for the meeting on April 20, 2023 (Attachment 5).

The assessment of effects discussion below has been updated to address concerns raised in the meeting specific to the Wilmington Historic District and the Memorial Bridge. The text for the Battleship, Beltline, and Holy Church of Jesus Christ is the same as the March 21, 2023, letter.

### **Assessment of Effects**

Utilizing the examples of adverse effects from 36 CFR 800.5(a)(2), FRA continues to find that none of the five historic properties will be destroyed, moved, neglected, repaired, or rehabilitated, or have a change of use. Below is the assessment regarding potential visual, noise, and vibration effects. See the AOE Report submitted with this letter for additional details on the analysis of effects (Attachment 1).

#### Wilmington Historic District (Revised from March 21, 2023, Findings Letter)

The AOE Report has been revised to address concerns raised at the April 20, 2023, consulting parties meeting over noise impacts and concerns about vibration near one building that contributes to the Wilmington Historic District.

The Project construction, including the entirety of the proposed rail bridge over the Cape Fear River, will occur within the boundaries of the Wilmington Historic District; however, the Project will not demolish, destroy, or move any contributing resources to the historic district. Construction within the historic district boundaries is limited to non-contributing properties, except for the Cape Fear River which is a resource type typically excluded from the definition of a site by the National Register.<sup>1</sup> Regardless, FRA

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<sup>1</sup> The 1974 Wilmington Historic District nomination had a period of significance from c.1740 to 1924 and the boundaries included small portions of the eastern banks of the Cape Fear River north of the Memorial Bridge, but the river was not listed a contributing resource, as is consistent with National Register policy that natural waterways be excluded from the definition of a site. As per the National Park Service's (NPS) Bulletin 15 *How to Apply the National Register Criteria for Eligibility*:

A site may be a natural landmark strongly associated with significant prehistoric or historic events or patterns of events if the significance of the natural feature is well documented through scholarly research. Generally, though, the National Register excludes from the definition of "site" natural waterways or bodies of water that served as determinants in the location of communities or were significant in the locality's subsequent economic development. While they may have been "avenues of exploration," the features most appropriate to document this significance are the properties built in association with the waterways (page 5).

The 2003 National Register nomination update expanded the end of the historic district's period of significance to 1945 to include events and architecture from the 20<sup>th</sup> Century, mainly associated with African American history, and with two later dates associated with specific buildings outside the Project APE. The boundaries for the historic district were also expanded to the south of the Memorial Bridge and to the west bank of the Cape Fear River, although there are no contributing properties in this expanded area associated with the expanded period of significance. The Cape Fear River was included as a contributing resource in the 2003 nomination update, which stated: "This wide, navigable river has played a crucial role in the historical development of Wilmington and is one of the most important features within the district (Section 4, Page 244)." While the river was noted as having played a crucial role in the City's settlement and development and is an important feature, nothing in the nomination demonstrates how the expanded period of significance equals the expansion of the boundaries to include a natural waterway, which are typically excluded from the National Register. The only mention of the Cape Fear River in the 2003 nomination focuses on properties already captured within the original nomination and to the north, which is outside the Project APE.

... [The] Cape Fear River was the site of many industrial and commercial concerns including saw and planing mills, lumber yards, distilleries, warehouses, and the cotton compress located at Harnett and Nutt streets (all within the existing district boundaries). Farther north, in the expansion area, warehouses and lumber yards lined the Cape Fear River. The proximity of the expansion area to these businesses led to the growth of residential areas for railroad and industrial workers (Section 8; Page 20).



is responsible for assessing effects to the historic property, which is the Wilmington Historic District, not the Cape Fear River individually.

The Project reduces noise within the Wilmington Historic District. If the project is not constructed (i.e., the No Build Alternative), the Wilmington Historic District would experience an increase in severe noise by up to 10 percent due to the increase in rail operations and speed on the existing Beltline. Warning horns would occur at each of the existing 32 at-grade crossings on the Beltline, including in the Wilmington Historic District, resulting in severe noise impacts to approximately 1,500 residences, particularly at night. For the Preferred Alternative, the increase in rail traffic would be rerouted to the bypass. While the Project's noise report identified the need to sound warning horns at the Wright and Dawson Streets grade crossings along South Front Street, which would create severe noise impacts to 12 contributing properties to the Wilmington Historic District, representing less than 0.005 percent of the contributing resources, the Project would eliminate current and projected adverse noise effects by 97 percent by moving train operations to the Preferred Alternative.

Our office found in our letter dated March 21, 2023, that severe noise impacts to a very small number of contributing resources did not rise to the level of adversely affecting the Wilmington Historic District, as per 36 CFR 800.5, specifically that the audible element would not diminish the integrity of the property's significant historic features as defined in the National Register nomination. This finding was made with consideration to the substantial noise reduction that the Project would provide to the entire historic district.

After concerns about the noise impacts to these 12 contributing resources raised at the consulting party meeting on April 20, 2023, FRA and the City reviewed potential noise mitigation that could be employed to eliminate the noise impacts identified along South Front Street, even though this type of analysis is typically performed during the final design process. Based on that discussion, the City committed to addressing severe noise impacts through appropriate noise mitigation in the EA for the Project. Mitigation measures likely will include closing Dawson Street and reassigning Wright Street to private driveways to eliminate the need for sounding warning horns along the bypass. Such measures require City Council approvals, which would be obtained during the final design process. Additional mitigation measures for the Preferred Alternative may also be considered during the final design process. As mentioned above, there is no funding for the completion of final design and construction; however, if such funds are provided in the future by FRA, our agency will reinitiate Section 106 consultation with your office and the consulting parties to review the final plan development, including noise impact mitigation. Based on the information available from the current Project design, it is the finding of our agency that the project will substantially eliminate noise impacts within the Wilmington Historic District by moving freight traffic to the Preferred Alternative and that, through the implementation of identified noise mitigation measures, there would be no noise impacts to the Wilmington Historic District from the Project.

The consulting parties also noted concern for potential vibration effects to the property at 1121 South Front Street, which is a contributing resource to the Wilmington Historic District. This property is currently used for several small commercial businesses, including the Sol Bear Winery/restaurant and, due to its commercial nature, is not considered a sensitive vibration receptor per FTA's Transit Noise and Vibration Impact Assessment Manual (September 2018). Even though this building is not classified as a sensitive receptor, operation and construction noise and vibration levels were evaluated based on the concerns raised by consulting parties at the April 20<sup>th</sup>, 2023, meeting. The analysis provided in the enclosed Noise and Vibration Technical Report found that neither noise or vibration related to operations

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The inclusion of this natural waterway as a contributing resource is inconsistent with NPS guidance and the nomination is silent on why a typically excluded property type was included as a contributing resource.

or construction exceed the federal criteria for temporary or permanent impacts to the building or activities associated with the building (see Attachment 5).

While our previous letter dated March 21, 2023, stated pile drivers might be used, FRA and the City confirmed in recent conversations that pile drivers will not be used proximate to any contributing resource to the historic district, other than the Cape Fear River. Even though natural waterways are excluded as sites under the National Register, the Wilmington Historic District 2003 nomination update listed it as a contributing resource. Regardless, natural waterways are not defined by design, material, and workmanship that could be affected by noise and vibration. Therefore, based on the analysis presented above and in the Revised AOE Report, the Project will not have adverse effects that are auditory, atmospheric, or physical in nature from noise or vibration. In fact, the Project will reduce auditory effects to the Wilmington Historic District.

Using 36 CFR 800.5 examples, consideration was also given to if the Project would change the physical features within the historic district's setting that contribute to its historic significance or introduce visual elements that diminish the integrity of the historic district's significant historic features. The proposed rail line and rail bridge will introduce new elements to the southwest side of the Wilmington Historic District. As stated previously, the new railroad line is being constructed on non-contributing properties and is being moved farther away from contributing properties, such as the property at 1121 South Front Street, so its presence will not change the physical features within the historic district's setting that contribute to its historic significance or introduce visual elements that diminish the integrity of the historic district's significant historic features. The new bridge is a minor addition within a historic district that includes 2,500 contributing resources and covers 170 acres. Further, the new bridge was designed to minimize its visual presence. A Preliminary Navigational Clearance Determination from the U.S. Coast Guard established a horizontal navigational clearance of 250 feet and a vertical clearance of 135 feet above mean high tide. The reduced horizontal clearance requirement allows for the proposed bridge's vertical lift span towers to be inset from the Memorial Bridge's towers making its massing and scale comparable to the Memorial Bridge but with a lower profile. Its approaches and movable span will be about 40 feet above the river in the resting position, lower than the 65-foot height above the river of the Memorial Bridge's span in the resting position. In all key viewpoints of the proposed bridge north of the Memorial Bridge from within the historic district, the Memorial Bridge minimizes views to the proposed bridge. The built-up character of the historic district, the height of the buildings along Front Street, the presence of numerous mature shade trees, and the distance of the historic district's contributing resources limits key views to the proposed bridge. In locations where it is visible, the proposed bridge will be largely shielded from view and visually minimized by the extant bridge.

FRA applied the criteria of adverse effect under 36 CFR 800.5(a)(1) and finds that the Project will not diminish the location, setting, design, material, workmanship, feeling, and association of the Wilmington Historic District and therefore will not adversely affect the Wilmington Historic District.

USS North Carolina Battleship Memorial Site (Battleship) (Same as the March 21, 2023, findings letter)

The towers of the proposed bridge will be almost imperceptible on the horizon to the southeast of the Battleship due to distance, their location beyond (south of) the Cape Fear Memorial Bridge, and their height, which is lower than those of the Memorial Bridge. The proposed rail line will also not be visible due to distance and tree coverage. The Project will not change the physical features within the property's setting that contributes to its historic significance or introduce visual and atmospheric elements that diminish the integrity of the historic property's significant historic features; therefore, the Project will not adversely affect the Battleship's integrity of setting, feeling, and association. FRA applied the criteria of adverse effect under 36 CFR 800.5(a)(1) and finds that the Project will not adversely affect the Battleship.

Beltline District (Same as the March 21, 2023, findings letter)

The proposed rail bridge and the rail line on the west side of the Cape Fear River will not be visible from the Beltline District. On the east side of the Cape Fear River, a small portion of the new line running adjacent to South Front Street between Marstellar Street and Laughing Oak Lane will be visible from within the Beltline District's boundary. However, most of the Project work will be constructed along South Front Street along portions of the Beltline that are not included within the Beltline District. Since no Project elements will be visible from the Beltline, the Project will not have a visual effect upon the Beltline's integrity of location, design, setting, materials, workmanship, feeling, and association. FRA applied the criteria of adverse effect under 36 CFR 800.5(a)(1) and finds that the Project will not adversely affect the Beltline District.

Holy Church of Jesus Christ (Same as the March 21, 2023, findings letter)

The top of the east tower of the proposed rail bridge would be located more than 3,000 feet northwest of the church's NRHP-eligible boundaries. Three blocks of residential and industrial development, two largely vacant lots, and mature trees obscure the bridge site from the church. No part of the bridge would be visible from the church at any time of the year. At its closest point, the rail line portion of the Project will run about 700 feet west of the church, to the west of South Front Street. Rail traffic will be distant, but partially visible, from the northern edge of the church, looking west. The visible portion of the proposed rail line will parallel the line that has run along and west of South Front Street since the late nineteenth century. This rail line was a fixture when the church was built and has continued to be so to the present. The proposed new bridge will not be visible from the church, but a small portion of the proposed rail line will be visible in the distance from the northern edge its NRHP-eligible boundary. That portion of the rail line will run along or immediately adjacent to the Beltline, a historic rail corridor that continues to carry trains. Trains remain active here and will continue to run along South Front Street under the Build Alternative. As no new visual element will be introduced, the Project will not have a visual effect upon the Church's integrity of setting, feeling, and association. FRA applied the criteria of adverse effect under 36 CFR 800.5(a)(1) and finds the Project will not adversely affect the Holy Church of Jesus Christ.

Memorial Bridge (Revised from the March 21, 2023, findings letter)

The Memorial Bridge is significant for its notable engineering features under NRHP Criterion C. These features are its through-truss, vertical lift span; the two steel towers upon which that span can be raised and lowered; the wide concrete piers that support the towers; and the cantilevered extensions beyond both towers that hold traffic control gates and parking platforms for the bridge tender and work vehicles. The approaches beyond these elements are constructed in standard NCDOT fashion for the time. They are not distinctive characteristics of the lift-bridge's notable type of construction. The boundary for the Memorial Bridge is delineated by its notable engineering features (lift span, steel towers, concrete piers, cantilevered extensions) and its approaches, which are its key physical features. Due to the importance of these engineering features, the retention of location, design, material, and workmanship are critical to its retention of significance. Further, the Memorial Bridge will also continue to cross the Cape Fear River, as it was intended to; therefore, the integrity of its feeling and association will also remain intact even if its setting is altered. The Memorial Bridge was erected within an industrial environment to its immediate north and south on both banks of the Cape Fear. When it was constructed, rail lines on the east side of the river extended up to either side of its eastern approach span. The proposed new bridge and rail line will not change the character of the Memorial Bridge's use or of its physical features that contribute to its historic significance. While the Project will introduce a new element in the bridge's setting, based on the property type, since the physical features of the bridge's setting are less important than other aspects of integrity, it will not introduce a visual element that will diminish the integrity of the historic property's significant historic features.

Your office stated at the Consulting Parties meeting that you believe the placement of the Project bridge downstream from the Memorial Bridge would be an adverse effect to the Memorial Bridge. Our office

acknowledged that while the placement of a new bridge would affect the setting of the Memorial Bridge, such a change to its setting did not rise to the level of adverse effects as demonstrated through the analysis presented in the original AOE report dated March 2023. During the meeting, FRA requested details on why your office believed this change to the Memorial Bridge's setting was adverse, but no information was provided for our agency's consideration. Therefore, FRA continues to find that the proposed line and bridge will not alter the characteristics of the Memorial Bridge that qualified it for NRHP eligibility in a manner that would diminish its NRHP integrity of location, design, setting, materials, or workmanship, and, by extension, its integrity of feeling and association. FRA applied the criteria of adverse effect under 36 CFR 800.5(a)(1) and finds that the Project will not adversely affect the Memorial Bridge.

#### **Finding of Effects for the Wilmington Rail Realignment Project and Request for Concurrence**

In accordance with 36 CFR Part 800.5, FRA continues to find that the proposed Project will have **No Adverse Effect** on historic properties, as documented herein and in the attachments and in consideration of the concerns raised by consulting parties at the meeting on April 20, 2023. FRA requests your detailed response and seeks concurrence within 30 days of receipt of this letter. Please e-mail your response to Kristen Zschomler, Environmental Protection Specialist at [Kristen.zschomler@dot.gov](mailto:Kristen.zschomler@dot.gov). If you have any questions or need additional information about this undertaking, please contact Ms. Zschomler. Thank you for your cooperation on the Project.

Sincerely,



Melissa Ivie  
Deputy Federal Preservation Officer  
Federal Railroad Administration

CC:

Kristen Zschomler, FRA  
Alan Tabachnick, Federal Preservation Officer, Surface Transportation Board  
Mickey Sugg, Chief, Wilmington Regulatory Field Office, USACE  
Aubrey Parsley, Director of Rail Realignment, City of Wilmington, NC  
Evan Folds, New Hanover County Soil & Water Conservation District  
Captain Terry Bragg, USS North Carolina Battleship Commission  
Travis Gilbert, Historic Wilmington Foundation

Attachments:

Attachment 1: One hard copy and one digital copy of the Revised Assessment of Effects for Architecture/History Historic Report for the Wilmington Rail Realignment Project, Brunswick and Hanover Counties, North Carolina  
Attachment 2: 30% Design Plan Progress Prints  
Attachment 3: Project Visualizations  
Attachment 4: Noise and Vibration Technical Memorandum  
Attachment 5: 4/20/23 Consulting Party Meeting Summary





***SURFACE TRANSPORTATION BOARD***  
*Washington, DC 20423*

*Office of Environmental Analysis*

July 14, 2023

Laura Shick  
Acting Federal Preservation Officer  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590  
[Laura.Shick@dot.gov](mailto:Laura.Shick@dot.gov)

**Re: Wilmington Rail Realignment (ER 19-2629) of the CSX Transportation, Inc.  
Beltline in the City of Wilmington, North Carolina**

Dear Ms. Shick:

Pursuant to 36 C.F.R. § 800.2 (a)(2), I am writing to delegate the Federal Railroad Administration (FRA) as the lead federal agency under Section 106 of the National Historic Preservation Act, 54 U.S.C. § 306108, (Section 106) for the above-referenced rail realignment project (the Project). On February 22, 2021, FRA as lead federal agency, invited the Surface Transportation Board (Board) to become a participating agency in the preparation of an environmental assessment for the Project, pursuant to the National Environmental Policy Act, 42 U.S.C. §§ 4321-4370m-12. FRA is providing funding to the City of Wilmington (City) to complete the environmental review and preliminary engineering, and the proposed rail line construction and operation may require a license from the Board.

The Project involves the realignment of freight rail traffic from the CSX Transportation, Inc. (CSX) Beltline in the City to between the Port of Wilmington (Port) and the CSX Davis Yard in the Town of Navassa, North Carolina. The proposed new rail line would bypass the City and provide a more direct connection between the Port and Davis Yard. The purpose of the Project is to improve safety, regional transportation mobility, and freight rail operations, while also improving resiliency from storms, regional travel reliability, and operational fluidity of the sole freight rail route connecting the Port and southeastern North Carolina with the national freight rail network.

FRA and the City identified the Board's Office of Environmental Analysis (OEA) as a potential Section 106 consulting party early in the process, and OEA has participated in two of the three outreach meetings, with a fourth scheduled for July 25, 2023. This letter officially

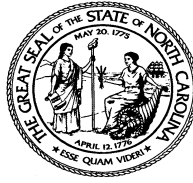
acknowledges OEA's role as a consulting party and designates FRA as the lead agency in the Section 106 review.

If you have any questions, please feel free to contact Alan Tabachnick, STB's Federal Preservation Officer for the Section 106 review at 202-934-8469 ([Alan.Tabachnick@stb.gov](mailto:Alan.Tabachnick@stb.gov)), or Diana Wood, OEA's Project Manager for the environmental review, at 202-934-0388 or by email at [Diana.Wood@stb.gov](mailto:Diana.Wood@stb.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Gosselin". The signature is fluid and cursive, with the first name "Danielle" written in a larger, more prominent script than the last name "Gosselin".

Danielle Gosselin  
Director  
Office of Environmental Analysis



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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary D. Reid Wilson

Office of Archives and History  
Deputy Secretary, Darin J. Waters, Ph.D.

August 9, 2023

Melissa Ivie  
Deputy Federal Preservation Officer  
Federal Railroad Administration  
1200 New Jersey Avenue, SE  
Washington, DC 20590

[melissa.ivie@dot.gov](mailto:melissa.ivie@dot.gov)

RE: Wilmington Rail Realignment and Right of Way Use P-5740, Wilmington, New Hanover County,  
ER 19-2629

Dear Ms. Ivie:

Thank you for your letter of July 5, 2023, providing the Federal Railroad Administration's (FRA) *Section 106 Assessment of Effects for Architecture/History Historic Properties Report and Finding of Effect* for the above-referenced undertaking and for FRA's Kristen Zschomler hosting a July 25, 2023, on-line meeting of the consulting parties to further discuss the Assessment and Finding of Effects (A/F of Effects). We appreciate, Ms. Zschomler's granting us an extension until August 9, 2023, to reply to the FRA's A/F of Effects and the information exchanged on-line.

Having reviewed the A/F of Effects and additional information as well as consulting with staff of the National Register of Historic Places, we provide the following comments for the above-ground properties as the parties have agreed that there are no National Register-eligible terrestrial or underwater archaeological properties/sites within the Area of Potential Effects (APE).

The North Carolina State Historic Preservation Office (HPO) concurs with the FRA's finding that the following properties will not be adversely affected by the proposed undertaking:

- USS North Carolina Battleship Memorial Site (Battleship),
- Beltline District,
- Holy Church of Jesus Christ, and
- Memorial Bridge.

However, as outlined below, we are concerned about several contributing properties within the Wilmington Historic District for which there is the potential of an adverse effect minus the additional considerations.

While the project will reduce noise levels in the majority of the historic district, the report indicates that there will be *severe noise impacts to twelve (12) contributing resources in the historic district*. To minimize or avoid an adverse effect to these resources, the City of Wilmington has committed to addressing severe noise impacts through appropriate noise mitigation in the Environmental Assessment (EA) for the project.

FRA has suggested that mitigation measures to address these concerns likely will include closing Dawson Street and reassigning Wright Street to private driveways to eliminate the need for sounding warning horns along the bypass. However, such measures require City Council approvals, which would be obtained during the final design process. Additional mitigation measures for the Preferred Alternative may also be considered during the final design process.

The HPO and consulting parties are also concerned about potential *vibration effects to the property at 1121 South Front Street*, a contributing resource to the Wilmington Historic District. FRA and the City have confirmed that pile drivers will not be used proximate to any contributing resource to the historic district, other than the Cape Fear River. However, we believe that additional monitoring and possible remediation efforts may be needed once more detailed design plans are prepared and provided for our review and comment.

Understanding there is no funding for completion of final design of the proposed undertaking, and should such funds be provided in the future by FRA, that FRA will reinitiate Section 106 consultation with the HPO and the consulting parties to review the final plan development, including noise impact mitigation and vibration effects within the Wilmington National Register Historic District, we concur with FRA's finding of No Adverse Effect on the district.

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 919-814-6579 or [environmental.review@dncr.nc.gov](mailto:environmental.review@dncr.nc.gov). In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Kristen Zschomler, FRA  
Mickey Sugg, USACE  
Aubrey Parsley, Wilmington  
Jessica Baldwin, Wilmington HPC  
Capt. Terry Bragg, USS North Carolina  
Travis Gilbert, HWF  
Joanna Rocco, AECOM  
Alan Tabachnick, STB  
Evan Folds, S&W Conservation District

[Kristen.zschomler@dot.gov](mailto:Kristen.zschomler@dot.gov)  
[Mickey.t.sugg@usace.army.mil](mailto:Mickey.t.sugg@usace.army.mil)  
[Aubrey.Parsley@wilmingtonnc.gov](mailto:Aubrey.Parsley@wilmingtonnc.gov)  
[Jessica.Baldwin@wilmingtonnc.gov](mailto:Jessica.Baldwin@wilmingtonnc.gov)  
[Terry.Bragg@dncr.nc.gov](mailto:Terry.Bragg@dncr.nc.gov)  
[gilbert@historicwilmington.org](mailto:gilbert@historicwilmington.org)  
[joanna.rocco@aecom.com](mailto:joanna.rocco@aecom.com)  
[alan.tabachnick@stb.gov](mailto:alan.tabachnick@stb.gov)  
[evansoilwater@gmail.com](mailto:evansoilwater@gmail.com)



## **APPENDIX B2: INTENSIVE-LEVEL HISTORIC ARCHITECTURAL SURVEY**

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# **Wilmington Rail Realignment Intensive-Level Historic Architectural Survey**

**Prepared For:**  
**Federal Railroad Administration and  
the City of Wilmington**

**Prepared By:**  
**AECOM**

**July 2022**

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## MANAGEMENT SUMMARY

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The City of Wilmington proposes the Wilmington Rail Realignment Project (the Project) which is receiving financial assistance from the Federal Railroad Administration (FRA). The Project is a rail route to bypass the existing freight rail route between Navassa (Davis Yard) and the Port of Wilmington (Port). The result would create a new freight rail alignment that would improve public safety, freight rail operations, and regional mobility. The Project Study Area extends approximately one-half mile on either side of the existing CSXT Transportation (CSXT) rail line from east of Navassa in Brunswick County to the Port of Wilmington through downtown Wilmington in New Hanover County (Beltline) and along the proposed alignment west of the Cape Fear River.

This report is prepared in compliance with Section 106 of the National Historic Preservation Act (NHPA), which requires that federal agencies consider the effects of their funded, permitted, licensed, or approved projects on historic properties. A historic property—as defined by Section 106—is any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP).

FRA initiated consultation and defined an Area of Potential Effects (APE) in consultation with the NCHPO. An initial Reconnaissance-Level Historic Architectural Survey report was prepared for the project in July 2021 and submitted to the NCHPO for review and comment. The Reconnaissance-Level report recommended that one individual resource and one group of resources within the APE be further assessed at the intensive level, to determine whether they might be eligible for NRHP listing: (1) the former Holy Church of Jesus Christ (NH3680) at 216 Marstellar Street; and (2) the Wilmington Historic District Potential Expansion (NH3681). In a letter dated August 23, 2021 to the FRA, the NCHPO concurred with the recommendation of additional assessment of these two resources at the intensive level. This Intensive-Level Historic Architectural Survey report addresses these resources. FRA held a consulting parties meeting in November 2021 and confirmed the scope of the Intensive Level Survey would only be for NH3680 and NH3681.

The following table identifies the resources requiring evaluation and summarizes the recommendations regarding their NRHP eligibility based on the findings of this report:

RESOURCE NAME	NCHPO SURVEY SITE #	NRHP ELIGIBILITY RECOMMENDATION AND CRITERIA
(Former) Holy Church of Jesus Christ	NH3680	Recommended NRHP Eligible under Criterion C/Criterion Consideration A for its architecture

RESOURCE NAME	NCHPO SURVEY SITE #	NRHP ELIGIBILITY RECOMMENDATION AND CRITERIA
Wilmington Historic District— Potential Expansion	NH3681	Recommended not NRHP Eligible under any Criteria



## 1.0 INTRODUCTION

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The Federal Railroad Administration (FRA) and the City of Wilmington propose a route to bypass the existing freight rail route between Navassa (Davis Yard) and the Port of Wilmington (Port). The result would create a new freight rail alignment that would improve freight rail operations, regional mobility and public safety. The Study Area extends approximately one-half mile on either side of the existing CSXT Transportation (CSXT) rail line from east of Navassa in Brunswick County to the Port of Wilmington through downtown Wilmington in New Hanover County (Beltline) and along the proposed alignment west of the Cape Fear River (Figure 1).

The North Carolina State Historic Preservation Office (NCHPO) is tracking this project as ER 19-2629. Based on the data collected and analyzed for six (6) Build Alternatives in the recently completed Alternatives Analysis<sup>1</sup>, the City and FRA identified Alternative 2 as the Preferred Alternative (Figure 2).

This report is prepared in compliance with Section 106 of the National Historic Preservation Act (NHPA), which requires that federal agencies consider the effects of their funded, permitted, licensed, or approved projects on historic properties. A historic property—as defined by Section 106—is any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places (NRHP).

The Section 106 implementing regulations in 36 CFR Part 800 define a four-step process for compliance with Section 106. The four steps are:

1. Initiate consultation;
2. Identify historic properties that may be affected by the project and determine if the property or properties are eligible for or listed in the National Register of Historic Places (NRHP);
3. Determine if the undertaking will have an effect on those historic properties; and
4. Resolve any identified adverse effects on historic properties by developing and evaluating alternatives that could avoid, minimize, or mitigate those effects.

FRA initiated consultation and defined an Area of Potential Effects (APE) in consultation with the NCHPO. An APE is the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The FRA initially suggested an APE of 0.25 mile centered on the centerline of the Build Alternatives. In consultation with the NCHPO, the FRA expanded the APE to 0.50 mile around the towers for the lift span for the main Cape Fear River crossing, due to their proposed height range of 150 to 200 feet. While the lift span may not be visible from 0.50 miles away, this distance is consistent with the APE established nationwide for telecommunication towers of a similar height. This

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<sup>1</sup> AECOM, 2021, Wilmington Rail Realignment Alternatives Analysis Report. November 2021.

report is part of the historic property identification efforts required by the second step of the Section 106 process.

## 2.0 METHODOLOGY

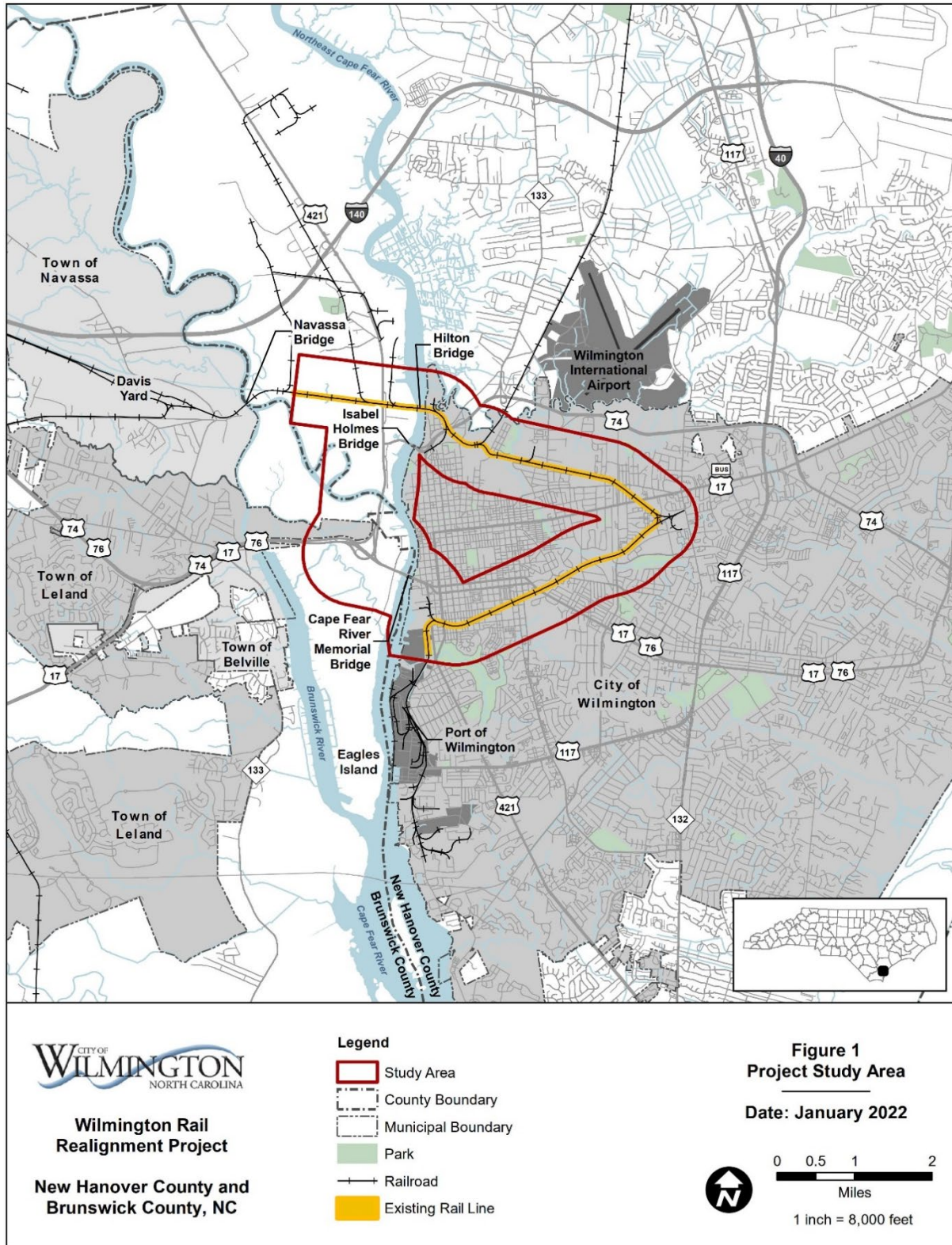
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### 2.1 RECONNAISSANCE-LEVEL HISTORIC ARCHITECTURAL SURVEY

A reconnaissance-level historic architectural survey was conducted as part of the effort to identify historic properties that may be affected by the project and determine what properties are eligible for or listed in the NRHP. A record search identified two such properties within the project's proposed historic architecture Area of Potential Effects (APE): (1) the Wilmington Historic District (HD), listed in the NRHP in 1974 and expanded in 2003; and (2) the Seaboard Air Line Railway/Atlantic Coast Railroad District, determined eligible for NRHP listing in 2020. On March 24 and 25, 2021, the streets within the edges of the irregularly shaped southernmost portion of the Wilmington HD and the proposed historical architectural APE were walked. Resources within this portion of the APE that appeared to be 50 years old or older, or of exceptional importance, were photographed. The grounds of the Port of Wilmington and the industrial liquid bulk storage facilities of Colonial Terminals, Inc. were not reviewed. The portion of the Port of Wilmington that is within the APE does not have any structures. The age of the Colonial Terminals storage tanks is undetermined, and the lot was inaccessible, therefore, storage tanks on the Colonial property were not assessed.

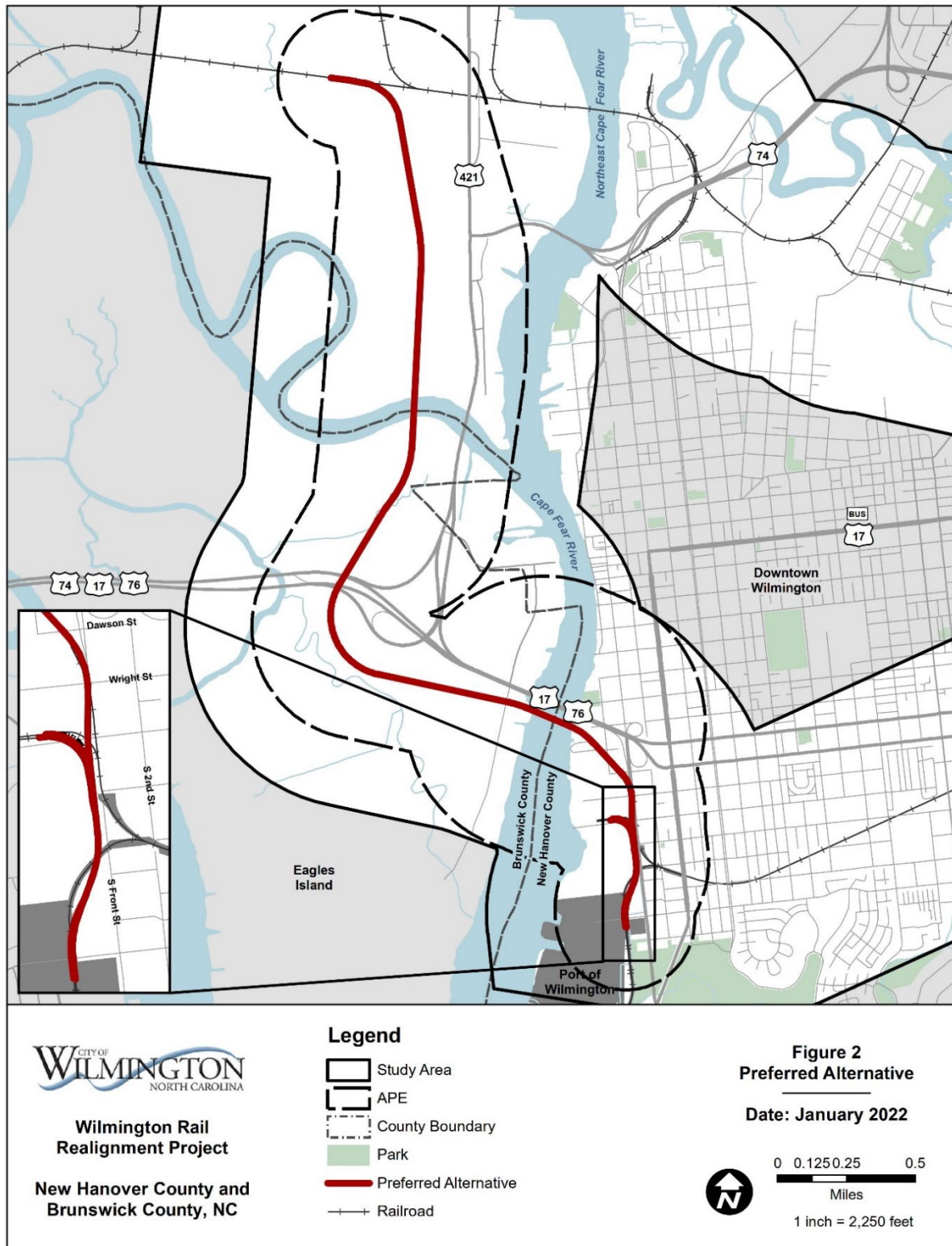
An initial Reconnaissance-Level Historic Architectural Survey report was prepared for the project in July 2021 and submitted to the NCHPO for review and comment. The Reconnaissance-Level report recommended that one individual resource and one group of resources be further assessed at the intensive level to determine whether they might be eligible for NRHP listing: (1) the former Holy Church of Jesus Christ (NH3680) at 216 Marstellar Street; and (2) the Wilmington Historic District Potential Expansion (NH3681) within the project's APE to the south of Wright Street, east of South Front Street, west of Burnett Boulevard/South 3rd Street, north of Greenfield Street and west of South 4th Street. In a letter dated August 23, 2021 to the FRA, the NCHPO agreed with the recommendation of additional assessment of these two resources at the intensive level.

**Figure 1: Project Study Area**





**Figure 2: Preferred Alternative**





## 2.2 INTENSIVE-LEVEL HISTORIC ARCHITECTURAL SURVEY

To further evaluate the NRHP eligibility of the church and the potential expansion of the Wilmington HD, AECOM senior architectural historian Marvin A. Brown, who meets the Secretary of Interior's qualifications for architectural history (CFR 36 CFR Part 61), conducted fieldwork and research, analyzed the two resources, and developed this report. (Mr. Brown also completed the Reconnaissance-Level Report.) On September 30 and October 1, 2021, the resources were revisited and additional photographs were taken. On November 7, coordination occurred with members of the former Holy Church of Jesus Christ. During this visit, resources were located using the NCHPO's GIS map and database of New Hanover County, and all late-nineteenth and early twentieth-century churches throughout the Wilmington area were photographed. At the North Carolina Room of the New Hanover County Public Library in Wilmington, newspaper clippings, original copies of City of Wilmington Sanborn fire insurance maps, and twentieth-century city directories were evaluated. Additional Wilmington Sanborn maps were accessed online as well as other relevant newspapers, New Hanover County deeds, GIS data, plat maps, property and tax records, and other similar historical research.

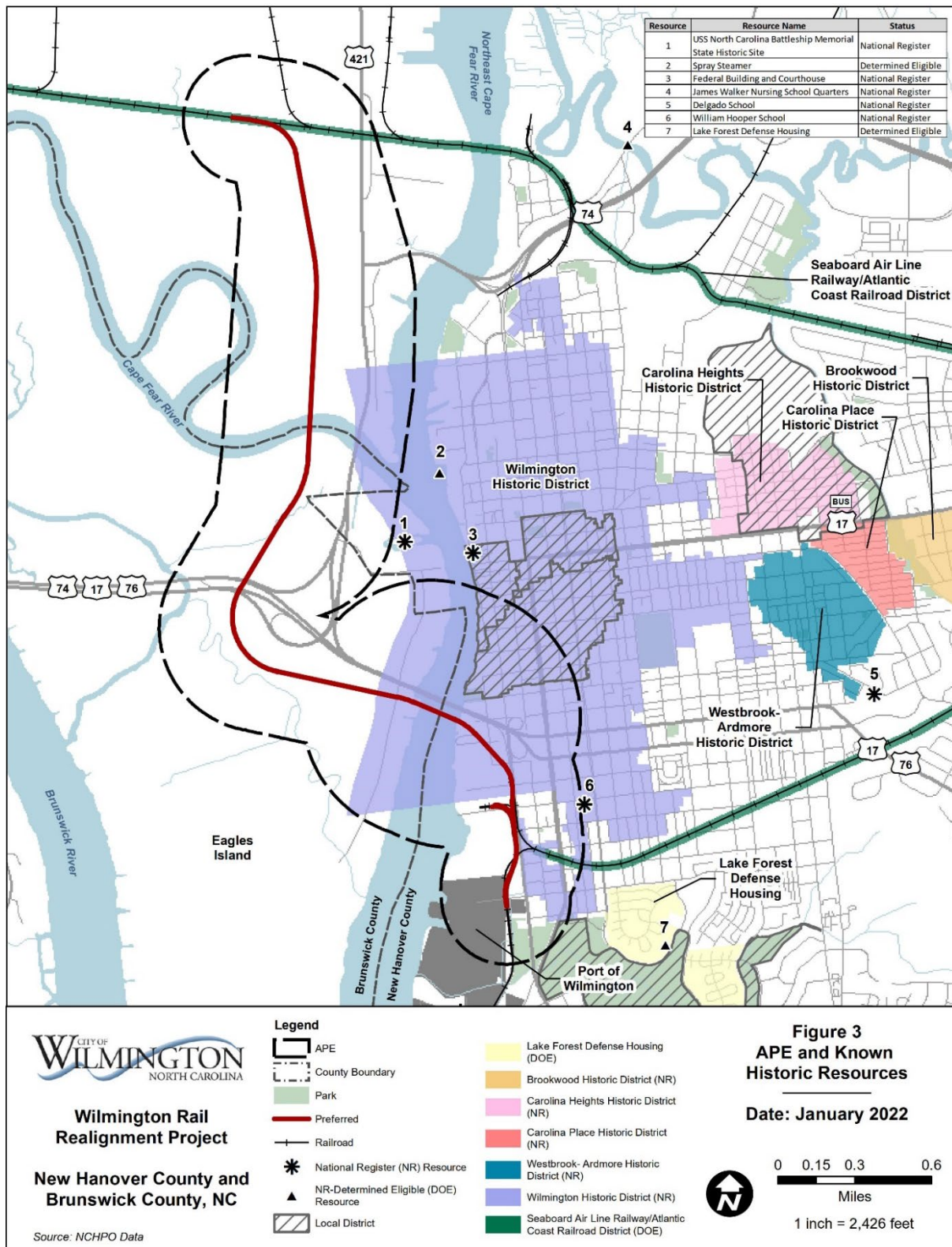
## 2.3 AREA OF POTENTIAL EFFECTS

The reconnaissance-level effort for historic architectural resources took place within the proposed APE of 0.25 miles buffered on the centerline of the Build Alternatives. In a meeting with the Section 106 consulting parties on November 17, 2021, the NCHPO and the FRA agreed to an increase in the size of the APE, which included the addition of a one-mile buffer around the southerly crossing of the Cape Fear River, to account for visual impacts from the height of the proposed rail bridge. This increase extended into a larger portion of the Wilmington HD, but did not add any additional potentially NRHP-eligible resources (Figure 3).<sup>2</sup> This report therefore only addresses the NRHP eligibility of the former Holy Church of Jesus and the potential for an expansion of the Wilmington HD.

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<sup>2</sup> The roads within the proposed APE located on the west bank of the Cape Fear River were reviewed in the field during the reconnaissance-level effort. This area included no previously identified historic properties, with the exception of the USS North Carolina, which contributes to the Wilmington HD and will be addressed during a subsequent phase of the Project. The increased portion of the APE on the west bank of the river included no additional potential historic resources not already addressed during the reconnaissance-level field study.

**Figure 3: APE and Known Historic Resources**



## 3.0 INTENSIVE-LEVEL INVENTORY, EVALUATIONS, AND RECOMMENDATIONS

### 3.1 INTRODUCTION

This chapter describes the resources that were evaluated as part of the intensive-level inventory: Former Holy Church of Jesus Christ and Wilmington HD.

### 3.2 FORMER HOLY CHURCH OF JESUS CHRIST (NH3860)



<b>Resource Name</b>	Former Holy Church of Jesus Christ
<b>HPO Survey Site #</b>	NH3680
<b>Location</b>	216 Marstellar Street
<b>Parcel No.</b>	R05413-033-024-000
<b>Construction Date</b>	Ca. 1926
<b>Recommendation</b>	Eligible for NRHP listing under Criterion C/ Criterion Consideration A

#### 3.2.1 Architectural Description

The former Holy Church of Jesus Christ (currently Spirit of Truth Ministries – NH3680) is a little-altered, rectangular, one-story frame building (Exhibit 1 through Exhibit 4). Clad in original German siding, it is edged by wooden cornerboards that rise from a single-board plinth to the eaves. A stuccoed masonry foundation supports the building and an asphalt-shingled, gable-front roof underpinned by exposed rafter tails tops it. The church has a north-facing front elevation and is three bays wide. A pair of doors, each with five stacked flat panels, is centered in the facade. A wooden stoop with a stair climbing from the east and a ramp from the west provides access to the entry. Single wooden, six-over-six, double-hung sash windows are set to either side of the entry. Plain surrounds frame the double doors and these windows.

Four evenly spaced windows, and the boarded-over opening of a fifth cross the east side elevation. At the west elevation, all five windows are exposed. All nine side-elevation windows match those of the façade and are framed by identical surrounds. The south rear elevation has an original surround framing a boarded-over window, a centered single-door entry and a tiny shed-roofed ell at its east end that holds a bathroom. Most of the window glass is transparent, but some panes are textured and opaque. Exterior alterations are few, consisting of the rails, balusters, and ramp at the entry; bars over all but one of the side-elevation windows; the concrete stairs and handrail at the rear entry; and the bathroom ell addition.



The church interior was viewed on November 7, 2021 and not photographed.<sup>3</sup> The church has no vestibule; one enters directly into the sanctuary. Original beaded boards clad the ceiling and walls. The wooden floor, which appears to be original, is laid on the diagonal. Twelve plain wooden pews set in two rows are also likely original. They face a platform at the south that is elevated above the floor level. A door to the east side of the platform leads to the church's rear room and later-added bathroom, neither of which were viewed.



**Exhibit 1: Former Holy Church of Jesus Christ, west side elevation, at left; north façade and west elevation, at right**



**Exhibit 2: Former Holy Church of Jesus Christ, north facade, at left; east side elevation and north facade, at right**

<sup>3</sup> The church was first visited while fieldwork was conducted on March 24-25. Subsequent visits occurred on September 30 and October 1, 2021. On November 7 the church was visited again, before Sunday services were to start. Member Denise Hewett responded to a request to take photographs by calling Chief Apostle, Vivian B. Whitehead Barrett, for permission. Ms. Barrett asked that no photographs be taken.





**Exhibit 3: Former Holy Church of Jesus Christ, façade and east side elevation, at left; rear and west side elevations, at right**



**Exhibit 4: Former Holy Church of Jesus Christ, south rear elevation facade, at left; facade window, surround, and ramp railing, at center; German siding and eaves at southwest corner of facade, at right**

### 3.2.2 Historical Background

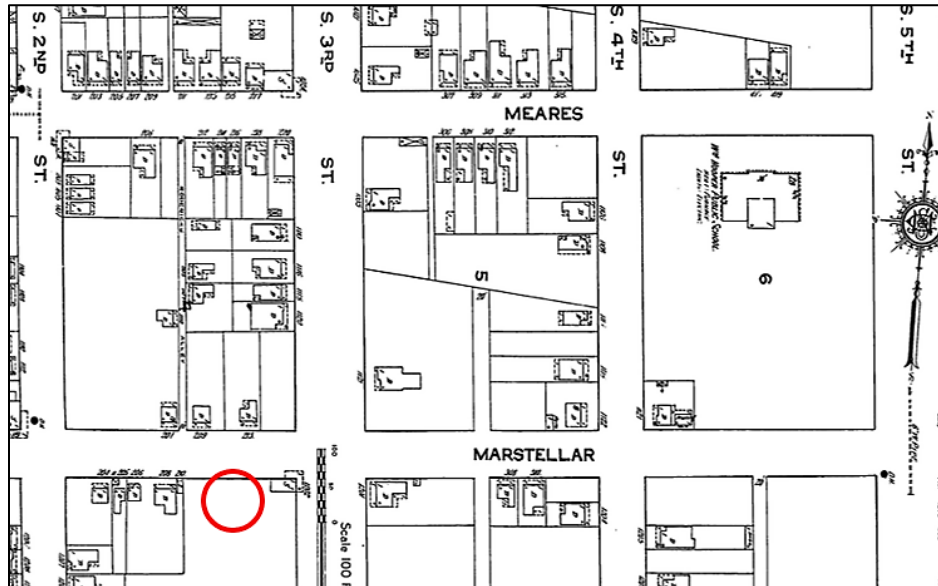
New Hanover County property assessment records assign the church a 1910 construction date.<sup>4</sup> Its physical appearance suggests that it could date to the early-twentieth century. However, its lot is vacant on the 1915 Wilmington Sanborn map and it first appears on that map's 1951 update (Figure 4 and Figure 5).<sup>5</sup> The earliest located reference to the church is in

<sup>4</sup> New Hanover Property Assessment of 216 Marstellar Street, 2021.

<sup>5</sup> Sanborn Map Company, 1915 *Insurance Maps of Wilmington, North Carolina* and 1951 update of 1915 *Maps*.

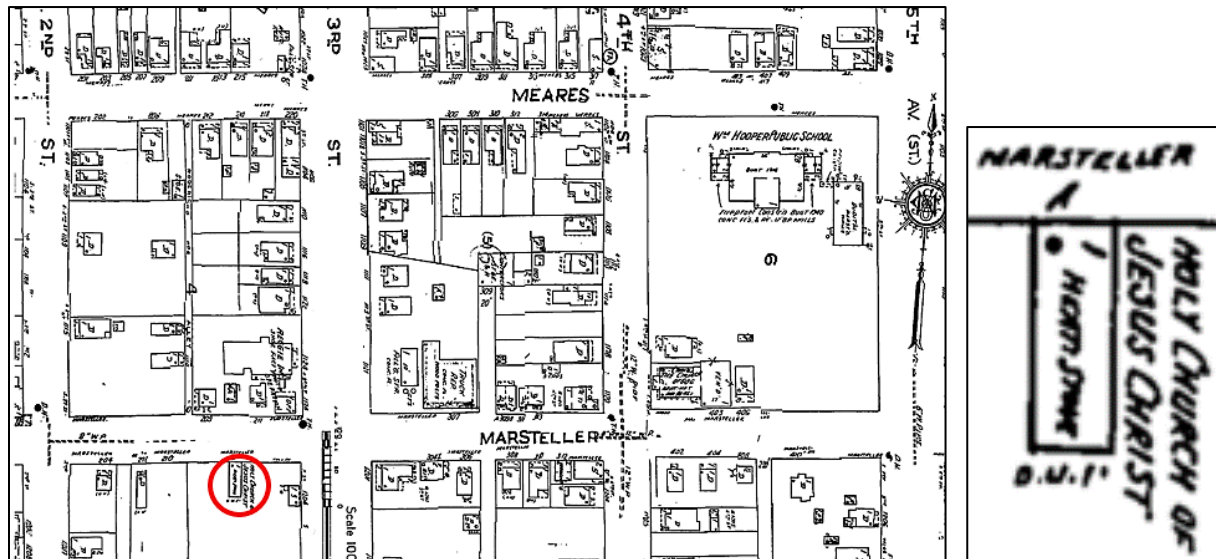
the 1924 Wilmington city directory. It places it on the 200 block of Marstellar Street with Reverend G.L. Pridgen as its pastor.<sup>6</sup> Listed under the Holiness denomination, its name is given simply as "Holiness," in one place in the directory, and "Holiness Mission," in another. While the church is identified as having a white congregation, the city's other two Holiness churches were African American. The 1926 directory classifies it as one of four Holiness churches in the city, all of which it denotes as African American. It further identifies Reverend Pridgen as white at his home address, but as Black where he is referred to as pastor. It gives the church's name as Holy Church of Jesus Christ. The 1928 directory lists Reverend Pridgen, in all places where he is named, as white. The church's name is the same, but is categorized as an "undenominational" church, along with the Salvation Army Citadel. Both of these are identified as white.

**Figure 4: 1915 Wilmington Sanborn Map, Sheet 41, with Vacant Site of Church Circled in Red**



<sup>6</sup> Hill Directory Co., *Wilmington N.C. City Directory*, 1924, 1926, and 1928.

**Figure 5: 1951 Update of 1915 Wilmington Sanborn Map, Sheet 41, with Church Circled in Red, at Left, and Blown-Up Section, at Right**



Censuses and the various jobs that Pridgen held to make ends meet make it clear that he was white, as was his congregation, which is consistently identified as such in post-1926 directories.<sup>7</sup> The 1926 directory's confusion may have stemmed from the divisions within the Holiness Church in North Carolina in the late nineteenth and early twentieth centuries, when the denomination transformed from an outgrowth of Methodist to Pentecostalism, including the African-American Pentecostal Holiness Church. The congregation of the Holy Church of Jesus Christ was apparently finding its way in its early years, shifting from Holiness to undenominational.<sup>8</sup>

Garris Lee or G.L. Pridgen was born in Kelly in Bladen County, North Carolina in 1886. A brief biographical account states: "He was called from a denominational church in 1909 at Kelly after a revelation from the Word of God, of the oneness of God. He went to Monroe, La. after much persecution for teaching this doctrine." He returned to Kelly in 1911 and continued "preaching the Apostolic Message" at the Holy Church of Jesus Christ, which he founded. He preached until his death in May 1941.<sup>9</sup>

Deeds suggest the church building was erected in 1925 or 1926. In November 1925 the church trustees purchased the lot upon which the building stands for \$200, to be paid off in weekly 50

<sup>7</sup> Federal censuses from 1900 through 1940 identify Pridgen as white. The jobs he held with the city in the 1920s and 1930s according to various city directories—including phone man and timekeeper with the city street department, and clerk for the department's superintendent—would not have been held by a Black man in Wilmington during those decades.

<sup>8</sup> Louis P. Towles, "Holiness Church," 2006; "Karen Lorene Zipf, "Pentecostal Holiness Church," 2006.

<sup>9</sup> *Wilmington Morning Star*, December 13, 1980.



cent increments. The deed was not filed, however, until April 1926.<sup>10</sup> In 1938, the church acquired an additional lot on its east, at the southwest corner of the intersection of Marsteller and South 3rd Street.<sup>11</sup>

The first non-directory mention of the church is found in Raleigh's *News and Observer* of December 31, 1926.<sup>12</sup> It notes that the Holy Church of Jesus Christ of Wilmington had been incorporated as a non-stock entity by five Wilmington men, including pastor Garris L. Pridgen. The Raleigh paper mentioned the church again in an announcement of a wedding held there on February 28, 1927.<sup>13</sup> The first two mentions of the church identified in Wilmington newspapers date from 1935 and 1940. Both call it the Holy Church of Christ, as does the 1951 Sanborn map.<sup>14</sup>

The last two individuals carried on the Holy Church of Jesus Christ membership rolls—Wanda Cherry and Terry O'Sullivan—gifted the church building parcel and the adjacent tract to the United Pentecostal Church of Wilmington in 1995.<sup>15</sup> The property was then transferred to private hands, but the building remains a church, currently serving the congregation of the Spirit of Truth Ministries.

### 3.2.3 NRHP Evaluation and Recommendation

#### Context

To assess the Holy Church of Jesus Christ's NRHP eligibility, a context for local church buildings of similar scale, form, finish, and/or date was created. Two principal means were used to identify similar structures: (1) the North Carolina State Historic Preservation Office (HPO) Geographic Information Systems (GIS) website; and (2) field survey. The HPO GIS website was used to develop a preliminary list of churches including their name, location, status and, where available, description and date. More than three-quarters of the approximately 85 previously inventoried churches were located within various NRHP-listed Wilmington historic districts. As these included little descriptive information, the churches were searched in the nominations. A winnowed-down list of churches was then generated and mapped. Additional churches were

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<sup>10</sup> New Hanover County Deed Book 170/Page 266 (1926).

<sup>11</sup> Deed Book 273/Page 255 (1938).

<sup>12</sup> Hill Directory Co., *Wilmington N.C. City Directory*, 1926; *News and Observer* [Raleigh], December 31, 1926.

<sup>13</sup> *News and Observer* [Raleigh], March 1, 1927.

<sup>14</sup> *Union Labor Record and The Carolina Farmer* [Wilmington], September 27, 1935; *Star-News* [Wilmington], June 23, 1940; Sanborn Map Company, 1951 update, *Insurance Maps of Wilmington, North Carolina*. Volume 1.

<sup>15</sup> Deed Book 1857/Page 902 (Cherry affidavit); Deed Book 1857/Page 903 (O'Sullivan affidavit); Deed Book 1857/Page 904 (corner lot deed); Book 1862/Page 925 (church building lot deed). All four deeds were dated and filed in 1995.



located by driving down main thoroughfares in neighborhoods outside of the historic districts that were established at the turn of the nineteenth century and by remaining alert to other churches passed while traveling from point to point. About 30 churches were visited. Photos were taken of most of these.

Many of Wilmington's grand churches were erected in the 1920s. They are contemporary with the former Holy Church of Jesus Christ building, but otherwise not comparable. The four depicted below are representative of these: the Neoclassical Revival-style, brick Trinity United Methodist Church (1921) at 1403 Market Street (NH1372); the double-towered, African American, brick Ebenezer Baptist Church, now Templo Adoración y Alabanza (1927) at 209 South 7th Street (NH2072); the Gothic Revival-style, stone First Presbyterian Church (1927) at 125 South 3rd Street (NH0085); and the Neoclassical Revival-style, brick First Church of Christ, Scientist (1928) at 1620 Chestnut Street (NH1704) (Exhibit 5 and Exhibit 6).<sup>16</sup>



**Exhibit 5: Trinity Methodist Church (1921), at left, and Ebenezer Baptist Church (1927), at right**



**Exhibit 6: First Church of Christ, Scientist (1928), at left, and First Presbyterian Church (1927), at right**

Eight other Wilmington churches are more comparable to the former Holy Church of Jesus Christ. They vary in size, orientation, and date, but are relatively modest in form and, generally,

<sup>16</sup> Beth Keane, "Carolina Heights Historic District" NRHP nomination form, 1998 (Trinity Methodist Church and First Church of Christ, Scientist); Sherry Joines Wyatt and L. Robbie King, "Wilmington Historic District Boundary Expansion and Additional Documentation" NRHP nomination form, 2003 (First Presbyterian Church and former Ebenezer Baptist Church).

finish. Their salient characteristics are summarized as follows in the remainder of this subsection

The former Ironside Baptist or Primitive Baptist Church (NH0170) was erected at 507 Castle Street between about 1877 and 1882.<sup>17</sup> In form, materials, and finish, it is more comparable to the Holy Church of Jesus Christ than any other church identified in the city, even though it is almost a half-century older. The frame building is a one-story, gable-front rectangle clad in weatherboards. Its pointed-arch transoms, filled with tracery, are relatively stylish, but its wood floors and beaded-board walls and ceilings are similar to those inside the Holy Church of Jesus Christ ( Exhibit 7 and Exhibit 8). It currently houses the Tierra Sol Sanctuary (a yoga studio) and lacks pews, but otherwise appears to be remarkably intact.



**Exhibit 7: Former Ironside Baptist or Primitive Baptist Church, west side and south front elevations, at right, and west side and north rear elevations, at left**



**Exhibit 8: Former Ironside Baptist or Primitive Baptist Church, interior**

<sup>17</sup> Terra Sol Sanctuary website and a plaque inside the church provide this historic information, which is credited to the Historic Wilmington Foundation. The building appears on the 1904 Sanborn map, the earliest to cover its block. It also referenced, but not depicted, on the 1898 Sanborn-Perris map.



Mt. Ararat AME Zion Church (NH0565) at 7061 Market Street is a frame, one-story, gable-front rectangular church like the Holy Church of Jesus Christ (Exhibit 9 and Exhibit 10). It additionally has pointed-arch transoms and a central projecting entrance tower crowned by a pyramidal-roofed steeple. Its original weatherboards are vinyl-sided and its interior, in 2010, retained original wood trim, original wood floors beneath carpeting and altered paneled walls. A concrete-block wing was extended across its rear in 1973. A cornerstone dates the church to 1878. Some of the graves in its associated cemetery have in the past been decorated with shells and shards of glass which was a common African American practice along the Southeast coast. The church was determined eligible for NRHP-listing in 2010.<sup>18</sup>



**Exhibit 9: Mt. Ararat AME Zion Church, southwest side and southeast front elevation, at left; southeast front and northeast side elevations, at right**



**Exhibit 10: Mt. Ararat AME Zion Church, interior in 2010 (photographer: Kate Husband)**

<sup>18</sup> Mattson, Alexander and Associates, 2010, "Historic Architectural Resources Survey Report, Military Cutoff Road and Hampstead Bypass"; Kate Husband, 2010, NCDOT Memorandum re: Mattson, Alexander and Associates, 2010, "Historic Architectural Resources Survey Report, Military Cutoff Road and Hampstead Bypass."

New Jerusalem Missionary Baptist Church was built at 540 6th Street in about 1895. Its basic, rectangular, gable-front form and frame construction is like that of the others in the group of eight churches discussed here (Exhibit 11 and Exhibit 12). More finely finished and quite intact on the exterior, it retains a corner tower, weatherboard and scalloped-shingle siding, pointed-arched windows and transoms with tracery and an ornate facade. An undated online image depicts an altered interior with acoustic ceiling tiles, paneled walls and carpeting. The church is a contributing resource to the Wilmington Historic District.<sup>19</sup>



**Exhibit 11: New Jerusalem Missionary Baptist Church, south side and east front elevations, at left; detail of east-facing façade, at right**



**Exhibit 12: New Jerusalem Missionary Baptist Church, undated, composite, interior photograph (source: locationshub.com website)**

Beneath its brick-veneered shell, which was added in 1948, St. Matthews AME Church (NH1404) is a basic, gable-front rectangular building (Exhibit 13 and Exhibit 14). The frame church was erected in 1909 at 6809 Wrightsville Avenue. Its pointed-arch windows are original, as are its interior wood trim and beaded-board walls and ceiling. Its projecting front tower appears original as well, although the crenelations may date to 1948. A later-added L-shaped addition or additions on the northwest gives the building a "Π"-shaped footprint, but the original

<sup>19</sup> Wyatt and King, 2003, "Wilmington Historic District Boundary Expansion and Additional Documentation" NRHP nomination form.



rectangular church building, along with its more than 70-year-old brick veneer is considerably intact.



**Exhibit 13: St. Matthews AME Church, northwest side and southwest front elevations, at left; southwest front and northeast side elevations, at right**



**Exhibit 14: St. Matthews AME Church, interior**

A largely altered example of the type is Federal Point Pentecostal Church (NH3654) at 629 Piner Road (Exhibit 15). Its frame rectangular body has been vinyl sided and its windows replaced; a tall columned portico has been added to its façade along with a large lantern atop its gable-front façade; and a wing larger than its original block wings has been extended across its rear,

giving it a T-shaped footprint. Nonetheless, the church retains its basic, gable-front, rectangular frame form. The building was erected in 1930 according to tax records.



**Exhibit 15: Federal Point Pentecostal Church, west side and south front elevations, at left; south front and east side elevations, at right**

Mt. Pilgrim Baptist Church at 7500 Carolina Beach Road is also assigned a 1930 construction date by tax records. However, it may date to as early as 1922, the year the parcel was donated to the congregation for a "permanent church site."<sup>20</sup> The one-story, frame, gable-front building is vinyl sided, but retains pointed-arch transoms with tracery topping double-hung sash with colored-glass panes (Exhibit 16). The original or early ell across the rear retains matching windows and transoms. A large later addition extends to its rear.



**Exhibit 16: Mt. Pilgrim Missionary Baptist Church, south side and east front elevations, at left; south front and west side elevations, at right**

Pilgrim Rest Baptist Church (no survey number; not in HPO database) was erected at 6761 Wrightsville Avenue about 1935, across from St. Matthews AME Zion Church. It is constructed of concrete block, rather than frame, but otherwise utilizes the form under consideration. In

<sup>20</sup> *Wilmington Morning Star*, March 7, 1922.



addition to its gable-front, rectangular body, it has pointed-arch windows and a projecting front tower topped by a pyramidal roof ( Exhibit 17). A mid-twentieth-century photograph indicates changes to windows and the entry as well as the early presence of the northwest addition.<sup>21</sup>



**Exhibit 17: Pilgrim Rest Baptist Church: northwest side and southwest front elevations, at left; southwest front and southeast side elevations, at right**

The date of construction of the former Castle Heights Methodist (now St. Mark Free Will Baptist) Church (NH1404) at 1801 Castle Street is unclear. A 1913 newspaper story mentions its erection and it appears on the 1915 Sanborn map. However, tax records date it to 1940; the Westbrook-Ardmore Historic District NRHP nomination, to which it contributes, places its construction around 1945 and the 1951 update of the 1915 Sanborn shows the church's footprint altered. The building was likely extended to the rear and elevated in 1940-45, but its gable-front, frame, rectangular form probably dates to 1913 (Exhibit 18). It retains original pointed-arch windows and surrounds and continues to be clad in weatherboards. The portico and squat belfry are later additions.<sup>22</sup>

<sup>21</sup> Wilmington Planning Commission, 2011, "Wrightsville Sound Small Area Plan" presentation.

<sup>22</sup> Sanborn Map Company, 1915 *Insurance Maps of Wilmington, North Carolina* and 1951 update of 1915 *Maps*; Janet Seapker and Ed Turberg, "Westbrook-Ardmore Historic District" NRHP nomination, 2009.



**Exhibit 18: Former Castle Heights Methodist Church, south front and east side elevation, at left; north rear and west side elevations, at right**

***NRHP Eligibility Evaluation of Architectural Significance (Criterion C and Criterion Consideration A)***

The former Holy Church of Jesus Christ is a rare surviving example in the Wilmington area of the basic, traditional, rectangular form and frame construction of Protestant meetinghouses of the late nineteenth and early twentieth centuries. Of the small number of these churches that survive locally, it is the most straightforward and intact. It retains its rectangular, single-story, gable-front shape; its uncomplicated bays lacking pointed arches, tracery, or even colored glass; its elementary exterior trim and German siding; and its plainly finished interior of beaded boards, wooden floors and a double-row of early (or original) pews. The former Holy Church of Jesus Christ has no wings or additions (other than a rear bathroom) and no tower or steeple.

The former Holy Church of Jesus Christ is recommended eligible for NRHP listing under Criterion C for embodying the distinctive characteristics of its type. The property meets the requirement of Criterion Consideration A as a religious property that derives its significance from its architecture. Furthermore, it retains all seven elements of NRHP integrity — location, design, setting, materials, workmanship, feeling, and association — in support of its significance (Table 1).

**Table 1: Former Church of Jesus Christ Elements of Integrity**

<b>Former Holy Church of Jesus Christ</b>		
<b>Element of Integrity</b>	<b>Level of Integrity</b>	<b>Assessment</b>
Location	High	The church stands on the site where it was built, thereby retaining its integrity of location.
Design	High	The church has a high degree of design integrity, retaining its original single-story, rectangular, gable-front, frame form, bays, and materials, with no additions other than a small bathroom at the rear.



Former Holy Church of Jesus Christ		
Element of Integrity	Level of Integrity	Assessment
Setting	Medium/High	The church continues to face Marstellar Avenue in a largely residential neighborhood dating from the early through the mid-twentieth century; two commercial buildings to its east were erected in the 1950s. It therefore retains a medium/high degree of integrity of setting.
Materials	High	The church has a high degree of material integrity, retaining its original exterior trim, windows, and German siding, as well as its original wooden floors and beaded-board walls and ceiling.
Workmanship	High	The retention of its integrity of design and workmanship results in the church having high integrity of workmanship.
Feeling	High	High integrity of location, design, materials, and workmanship, accompanied by a medium/high degree of setting, result in high integrity of feeling.
Association	High	High integrity of location, design, materials, and workmanship, accompanied by a medium/high degree of setting, result in high integrity of association.

### ***NRHP Eligibility Evaluation of Historic, Associational and Information-Potential Significance (Criteria A, B and D)***

The church is not recommended as NRHP-eligible under Criterion A as it has no known connection with significant historic events. It is also not recommended as NRHP-eligible under Criterion B for it has no known association with the lives of persons significant in our past. Additionally, it is not recommended as NRHP-eligible under Criterion D as it is unlikely to yield important information based on its appearance or construction.

#### **3.2.4 Proposed NRHP Boundary**


The recommended NRHP boundary of the former Holy Church of Jesus Christ encompasses the 0.053-acre parcel (ID# R05413-033-024-000) that the church trustees acquired in 1925 and upon which they erected the church building ca.1926 (Figure 6). Associated with the church since its beginnings, the parcel includes a grassy area framing the church building and no resources other than that building which provides the former Holy Church of Jesus Christ with an appropriate historic setting.

**Figure 6: Proposed NRHP Boundary Former Church of Jesus Christ, New Hanover County**  
**ID# R05413-033-024-000**



The vacant 0.06-acre lot to the church's east (at the southwest corner of Marstellar and South 2nd Street), which the trustees acquired in 1938, is not included within the proposed NRHP boundary. The church building is not located on this parcel and there is no evidence — from the 1951 and 1955 Sanborn maps, tax records, or the physical site — that the church ever erected anything upon it.

### 3.3 WILMINGTON HISTORIC DISTRICT POTENTIAL EXPANSION (NH3681)

	<b>Resource Name</b>	Wilmington Historic District — Potential Expansion
	<b>HPO Survey Site #</b>	NH3681
	<b>Location of Potential Expansion Area</b>	S of Wright Street, E of S Front St, W of Burnett Blvd/S 3rd St, N of Greenfield St, and W of S 4th St
	<b>Parcel No.</b>	Multiple
	<b>Construction Date</b>	Ca.1900-2020
	<b>Recommendation</b>	Not eligible for NRHP listing under any NRHP Criteria

#### 3.3.1 Architectural Description

##### *Introduction and Inventory*

The resources within the APE located to the south of Wright St, east of S Front St, west of Burnett Blvd/S 3rd St, north of Greenfield St, and west of S 4th St are similar to adjacent areas that are part of the Wilmington HD. (This area excluded from, but partially framed by, the district is referred to here as the "southern APE area." It is part of the Dry Pond community.) Like those within the historic district, these southern APE area resources largely date from the early and mid-twentieth centuries and are predominantly frame residences. They are generally similar to the district resources in developmental history, scale and relationship to each other as well as to the street. However, many of these resources were built after 1945, the end date of the district's period of significance.<sup>23</sup> A number of these post-1945 resources are commercial buildings erected within the past 50 years on prominent corners of Front, 2nd, and 3rd streets, the area's principal north-south thoroughfares. Furthermore, there are many vacant lots within the southern APE area that were previously occupied by buildings.

<sup>23</sup> Two additional periods of significance—1953 and 1968 through 1971—are particular to the African American Williston School.

Within the southern APE area, 129 resources were surveyed. These are comprised of individual or small groups of standing resources, vacant lots, parking lots, and parks. The surveyed resources are mapped on Figures 7, 8, and 9, which identify them by parcel boundary, address, and a recommendation of whether a standing resource or group of standing resources would be potentially contributing (shaded in green) or noncontributing (shaded in red) if the historic district were to be expanded. Vacant lots, parks, and parking lots are discretely color-coded. The southern portion of the Wilmington HD is shaded purple; the boundaries of the southern portion of the APE are outlined in blue.

Each resource is also assessed in a table that includes its salient characteristics (Table 2). Address, type and/or name, date and a brief description were obtained and recorded for each through a combination of field appraisal and a study of Sanborn maps, city directories, tax records, and newspapers. In the case of lots and parks, information on what once stood on the land was also identified wherever possible. Each recommendation of status is accompanied by a brief statement supporting that recommendation. Vacant lots, parking lots, and parks are identified as such, rather than given a recommended status. Photographs of the resources are also included (Figure 7 through Figure 9 and Exhibit 19 through Exhibit 135). The photographs follow the order of the resources as listed in the table.

Following the figures, table, and photographs, the report addresses the characteristics of resources that could potentially contribute, or do not contribute, if the Wilmington HD were to be expanded. It considers integrity, age, and alterations, as well as vacant lots and the locations of noncontributing resources. It also summarizes the history of the southern APE area and Dry Pond, and the assessment of Dry Pond in the Wilmington HD's NRHP nomination. It concludes with an NRHP evaluation and recommendation.



Figure 7: Sheet 1 of 3, Map of Potential Wilmington Historic District Boundary Increase Resources with their Recommended Potentially Contributing/Noncontributing Status





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Figure 8: Sheet 2 of 3, Map of Potential Wilmington Historic District Boundary Increase Resources with their Recommended Potentially Contributing/Noncontributing Status

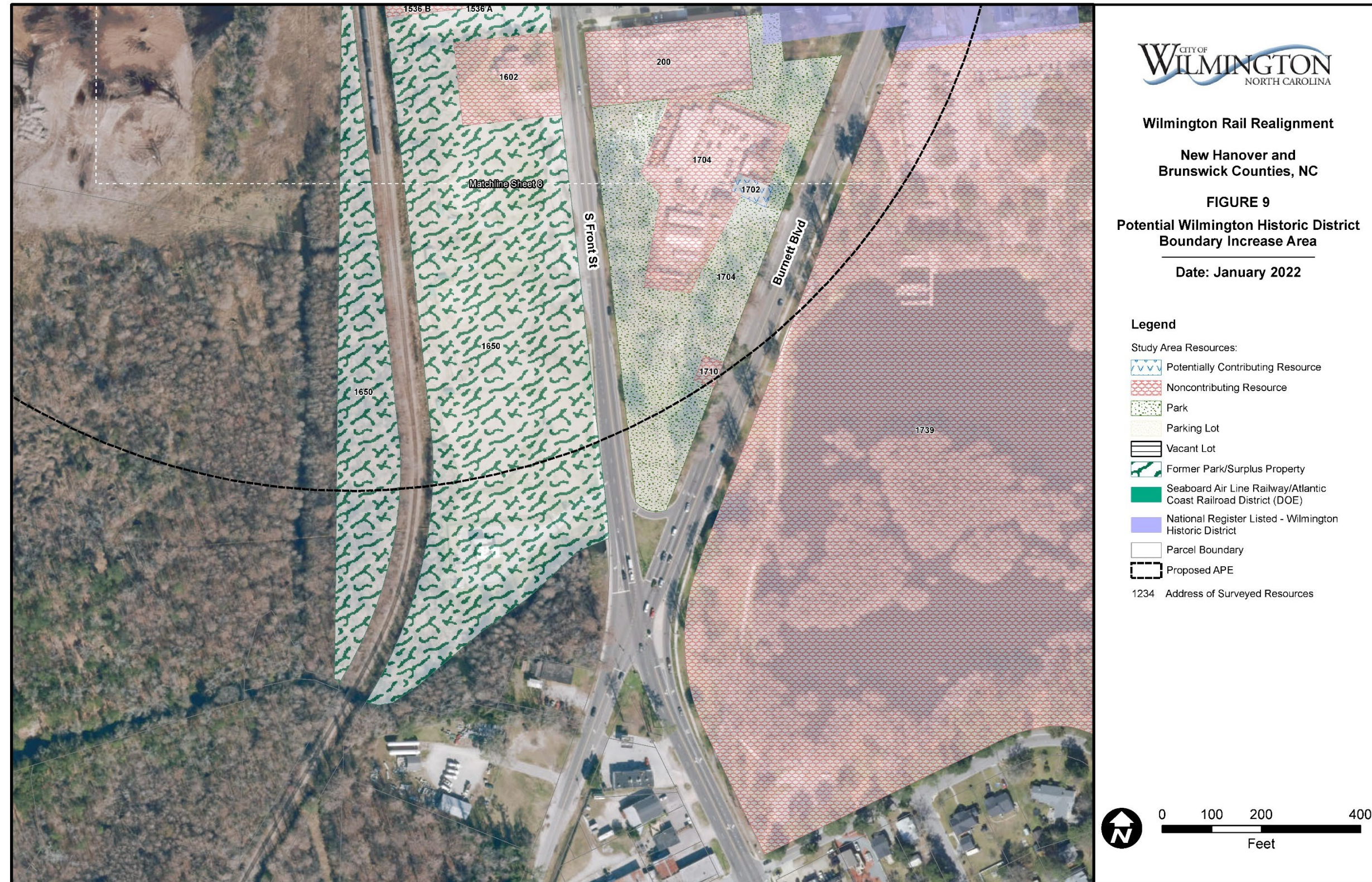




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Figure 9: Sheet 3 of 3, Map of Potential Wilmington Historic District Boundary Increase Resources with their Recommended Potentially Contributing/Noncontributing Status





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**Table 2: Inventory of Resources Within Potential Wilmington HD Boundary Increase Area**

ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
<b>South Front Street (W side)</b>			
1202 S Front St (Fig #7/Exh #19)	Former oil warehouse (1946 tax date)	1 story, steel-and-concrete industrial building with front parapet	NC – altered front elevation, bays, and parapet front
1402 S Front St (Fig #7/Exh #20)	Watson's Portable Welding (1962-tax date)	1-story, masonry-and-brick veneer industrial building	NC – age, outside HD's period of significance
1404 S Front St (Fig #7/Exh #21)	Vacant lot (vacant on 1955 Sanborn)	Vacant industrial lot	V
1530 S Front St (Fig #7/Exh #22)	Vacant lot (vacant on 1955 Sanborn)	Vacant industrial lot	V
1536A S Front St (Fig #7/Exh #23)	Former auto repair shop (1954 tax date)	1-story, concrete block-and-brick veneer industrial building	NC – age, outside HD's period of significance; has further lost integrity
1536B S Front St (Fig #7/Exh #24)	Former auto repair shop (1957 tax date)	1-story, concrete block-and-brick veneer industrial building	NC – age, outside HD's period of significance; has further lost integrity
1602 S Front St (Fig #8/Exh #25)	Former Optimist Club (1963 tax date)	1-story, frame-and-stucco, gable-end clubhouse	NC – age, outside HD's period of significance
1650 S Front St (Fig #9/Exh #26)	Former Optimist Park (ca. 1960s)	Unmaintained former city park declared surplus property in 2020	NC – age, outside HD's period of significance; has further lost integrity
<b>South Front Street (E side)</b>			
NE corner of S Front & Meares St/102 Wright St (Fig #7/Exh #27)	Vacant house lots	Vacant lots that held six houses on 1955 Sanborn	V
SE corner of S Front & Meares St (Fig #7/Exh #28)	Vacant house lot	Vacant house lot	V
1105 S Front St (Fig #7/Exh #29)	House (1910 tax date)	1-story, frame, asbestos-sided house with seam-metal gable-front roof	PC – intact sash, surrounds, front door, corner post, boxed eaves, and form
1107 S Front St (Fig #7/Exh #30)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
1109 S Front St (Fig #7/Exh #30)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
NE corner of S Front & Kidder St/ 1212 S Front St (Fig #7/Exh #31)	Vacant lot (vacant on 1955 Sanborn)	Vacant industrial lot	V
1525 S Front St (Fig #8/Exh #32)	Self-storage building (1967 tax date)	Repurposed, long, rectangular, brick-veneered, masonry building	NC – age, outside HD's period of significance; has further lost integrity
<b>South 2nd Street (W side)</b>			
1014 S 2nd St (Fig #7/Exh #33)	House (1910 tax date)	1-story, gable-front, frame house	NC – altered sash, surrounds, porch, vinyl siding

ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
1016 S 2nd St (Fig #7/Exh #34)	House (1959 tax date)	1-story, concrete-block, gable-end building used as house with frame garage	NC – age, outside HD's period of significance; additionally, siding and sash altered
1104 S 2nd St (Fig #7/Exh #35)	House (1945 tax date)	2-story, gable-front, masonry-and-asbestos sided house	NC – altered sash, surrounds, stoop, entry, asbestos siding
1106 S 2nd St (Fig #7/Exh #36)	Commercial garage (post-1955 Sanborn)	1-story, metal sided garage with brick-veneered parapet front	NC – age, outside HD's period of significance
1112 S 2nd St (Fig #7/Exh #37)	Commercial garage (1986 tax date)	1-story, gable-end, brick garage	NC – age, outside HD's period of significance
1206 S 2nd St (Fig #7/Exh #38)	House (1910 tax date)	1-story, hip-roofed, frame house	PC – intact weatherboards, surrounds, cornerboards and friezeboards, front gable with imbricated shingles and ventilator
1208 S 2nd St (Fig #7/Exh #39)	House (on 1915 Sanborn)	1-story, hip-roofed, frame house	PC – intact weatherboards, surrounds, cornerboards and friezeboards, front gable with imbricated shingles and ventilator
1210 S 2nd St (Fig #7/Exh #40)	Vacant house lot	Vacant lot with house on 1955 Sanborn	V
1216 S 2nd St (Fig #7/Exh #41)	House (on 1915 Sanborn)	1-story, frame, gable-front house with engaged full-façade porch	PC – intact weatherboards, brick foundation piers, engaged porch overhang with ventilator
1218 S 2nd St (Fig #7/Exh #42)	House (on 1915 Sanborn)	1-story, frame, gable-front house with engaged full-façade porch	NC – altered metal porch, asbestos and asphalt siding
1220 S 2nd St (Fig #7/Exh #43)	House (1947 tax date)	2-story, frame, gable-end house built with full-façade front porch	NC – altered sash, bays, metal porch posts, aluminum siding
1540 S 2nd St (Fig #7/Exh #44)	Retail building (2018 tax date)	2-story, metal, flat-roofed building with shipping containers incorporated	NC – age, outside HD's period of significance
<b>South 2nd Street (W side)</b>			
1013 S 2nd St (Fig #7/Exh #45)	House (1901 tax date)	2-story, frame, gable-front house	NC – altered porch, aluminum siding, surrounds, sash, bays
1015 S 2nd St (Fig #7/Exh #46)	House (1917 tax date)	1-story, gable-end frame house with façade gable	NC – altered full-façade porch, vinyl siding, surrounds, sash
1017 S 2nd St (Fig #7/Exh #47)	House (1912 tax date)	1-story, cross-gable, vinyl-sided, frame house	PC – intact triangular kneebraces, porch columns and brick piers, surrounds, most of sash
1103 S 2nd St (Fig #7/Exh #48)	House (1915 tax date)	1-story, frame, gable front house with replaced sash	PC – intact weatherboards, bays, door, surrounds, overhanging roof with gable window at altered full-façade porch
1105 S 2nd St (Fig #7/Exh #49)	House (1915 tax date)	1-story, frame, gable-front house	NC – altered vinyl siding, sash, porch



ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
1107 S 2nd St (Fig #7/Exh #50)	House (1915 tax date)	1-story, frame, gable-front house	NC – altered vinyl siding and modern front shingles, sash, surrounds, porch
1109 S 2nd St (Fig #7/Exh #51)	House (1942 tax date)	1-story, frame, gable-end house	NC - altered asbestos siding, sash, enclosed porch
1111 S 2nd St (Fig #7/Exh #52)	House (1936 tax date)	1-story, frame, gable-front house	NC - altered Masonite siding, sash, enclosed porch
1125 S 2nd St (Fig #7/Exh #53)	New Kelly's Chapel AME Church (1999 date stone)	1-story, gable-front, stuccoed masonry, rebuilt church	NC – age, outside HD's period of significance
1207 S 2nd St (Fig #7/Exh #54)	House (2002 tax date)	1-story, frame, vinyl-sided, Habitat for Humanity house	NC – age, outside HD's period of significance
1209 S 2nd St (Fig #7/Exh #55)	House (2003 tax date)	1-story, frame, vinyl-sided, Habitat for Humanity house	NC – age, outside HD's period of significance
1211 S 2nd St (Fig #7/Exh #56)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
1215 S 2nd St (Fig #7/Exh #56)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
1219 S 2nd St (Fig #7/Exh #56)	House (2006 tax date)	1-story, frame, vinyl-sided, Habitat for Humanity house	NC – age, outside HD's period of significance
<b>South 3rd Street (W side)</b>			
1014 S 3rd St (Fig #7/Exh #57)	Car sales office (1920 tax date)	1-story, frame, gable-front, former house	NC - altered vinyl siding, sash, porch, and bays
1016 S 3rd St (Fig #7/Exh #57)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
1024 S 3rd St (Fig #7/Exh #58)	Auto repair (1955 tax date)	1-story, concrete-block, former service station	NC – altered garage bays, plate glass windows; northern three bays later added
1102 S 3rd St (Fig #7/Exh #59)	Vacant restaurant (1983 tax date)	1-story, gable-end, concrete-block former restaurant	NC – age, outside HD's period of significance
1110 S 3rd St (Fig #7/Exh #60)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
1116 S 3rd St (Fig #7/Exh #61)	House (1897 tax date)	1-story, gable-front, frame house with altered sash and porch	PC – retains beaded-board siding, cornerboards and surrounds, front door and transom flanked by paired window bays
1118 S 3rd St (Fig #7/Exh #62)	House (1901 tax date)	1-story, gable-front, frame house with altered sash and porch balustrade, HardiPlank siding and shingles	PC – retains cornerboards and surrounds, full-façade porch with wooden posts on brick piers, paired front window bays
1120 S 3rd St (Fig #7/Exh #63)	House (1912 tax date)	1-story, gable-front, frame house with altered sash and porch balustrade, HardiPlank siding and shingles	PC – retains wraparound porch with wooden posts, entry with transom and sidelights, cornerboards and surrounds, front bay window
1122 S 3rd St (Fig #7/Exh #64)	Axe-throwing bar (1987 tax date)	1-story, gable-front, frame commercial building	NC - age, outside HD's period of significance

ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
1126 S 3rd St (Fig #7/Exh #64)	Parking lot	Site of neon sign shop and office on 1955 Sanborn map	Paved lot
120_ S 3rd St (Fig #7/Exh #65)	Vacant lot	Open lot on 1955 Sanborn map	V
1206 S 3rd St (Fig #7/Exh #65)	Commercial building (1952 tax date)	1-story, concrete-block, flat-roofed building with front brick parapet	NC – age; also altered bays, store fronts, sash and doors
1208 S 3rd St (Fig #7/Exh #66)	Former A&P market (1952 tax date)	1-story, brick and steel, parapet-front thrift store with paved parking lot	NC – age; also altered and filled-in bays and entries
1302 S 3rd St (Fig #7/Exh #67, 68)	Former McKee Ice and Coal Company (1945 tax date)	L-shaped, 1-story, concrete-block warehouse	NC – bays altered and former north wing that gave building an H-shaped footprint removed
1400 S 3rd St (Fig #7/Exh #69)	Parking lot for Nesbitt Court Apartments (ca. 1940)	Altered paved and landscaping parking lot	Parking lot; note—2003 boundary expansion of the Wilmington HD includes ca. 1940 Nesbitt Court (ca. 1940), but excludes this lot
<b>South 3rd Street (E side)</b>			
1103 S 3rd St (Fig #7/Exh #70)	Office (1978 tax map)	1-story, gable-front, frame, T-111 sided office and paved lot	NC - age, outside HD's period of significance
1107 S 3rd St (Fig #7/Exh #71)	House (1918 tax date, but on 1915 Sanborn map)	1-story, hip-roofed, frame house with original bay window and surrounds	NC – altered asbestos siding, porch, front door
1109 S 3rd St (Fig #7/Exh #72)	House (1901 tax date, but not on 1915 Sanborn map)	1-story, frame, gable-end bungalow with altered sash and later-enclosed porch	PC – retains weatherboard siding, projecting front gable, wooden cornerboards and surrounds, decorative rafter ends
1111 S 3rd St (Fig #7/Exh #73)	House (1901 tax date, but not on 1915 Sanborn map)	1-story, frame, gable-front house with aluminum siding, partly enclosed porch	PC – retains 9/1 sash, Craftsman-style tapered posts on brick piers at porch, corbelled chimney stack, decorative rafter ends
1115 S 3rd St (Fig #7/Exh #74)	Commercial building (1997 tax date)	Long, 1-story, flat-roofed, metal-sided building	NC - age, outside HD's period of significance
1203 S 3rd St (Fig #7/Exh #75)	House (2015 tax date)	1-story, frame, gable-front Habitat for Humanity house	NC - age, outside HD's period of significance
1207 S 3rd St (Fig #7/Exh #76)	House (1940 tax date)	1-story, gable-end, frame house	NC – altered porch, sash, asbestos siding
1209 S 3rd St (Fig #7/Exh #77)	House (1940 tax date, but may be on 1915 Sanborn map)	1-story, gable-front, frame house	NC – altered porch, entry, sash, vinyl siding, enclosed side porch
120_ S 3rd St (Fig #7/Exh #78)	Vacant lot	Open lot on 1955 Sanborn map	V
1215 S 3rd St (Fig #7/Exh #78)	Former Bordeaux Grocery Store (1959 tax date)	1-story, gable-front, concrete-block building with cinder-block additions to north side and rear	NC - age, outside HD's period of significance; additionally has large filled bays and concrete-block alterations/additions

ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
1227 S 3rd St (Fig #7/Exh #79)	Heating and air conditioning office (1982 tax date)	1-story building with walls and mansard-like roof sided with metal	NC - age, outside HD's period of significance
1303 S 3rd St (Fig #7/Exh #80)	House (1920 tax date, but on 1915 Sanborn map and outside coverage of earlier maps)	2-story, frame, gable-front, aluminum- and asbestos-sided house with altered sash, added rear stair leading to upper apartment	PC – retains wraparound Colonial Revival/Victorian porch, wood surrounds (upper front sash with spandrels), projecting side bay, diamond ventilator, rear ell
1305 S 3rd St (Fig #7/Exh #81)	House (2006 tax date, perhaps earlier but thoroughly renovated then)	1-story, gable-front, frame, vinyl-sided house	NC - age, outside HD's period of significance
1307 S 3rd St (Fig #7/Exh #82)	House (2006 tax date, perhaps earlier but thoroughly renovated then))	1-story, gable-front, frame, vinyl-sided house	NC - age, outside HD's period of significance
1309 S 3rd St (Fig #7/Exh #83)	House (1920 tax date)	1-story, hip-roofed, frame house with full façade porch with thick wooden posts	NC – altered sash, added picture window, vinyl siding
1371-1381 S 3rd St (Fig #7/Exh # 84)	Townhouses (2019 tax date)	Five 2-story, frame and metal, gable-front townhouses	NC - age, outside HD's period of significance
1401 S 3rd St (Fig #8/Exh #85)	Church (1973 tax date) (Greenfield Baptist Church)	1-story, gable-front, metal-sided church	NC - age, outside HD's period of significance
1403 S 3rd St (Fig #8/Exh #86)	Vacant lot	Vacant lot with concrete-block stairs and partial wall from demolished house	V
1415 S 3rd St (Fig #8/Exh #87)	House (1922 tax date)	1-story, gable-end, frame house with paired front windows and entry with sidelights	NC – altered sash, porch, vinyl siding
1423 S 3rd St (Fig #8/Exh #88)	Restaurant (1973) (The Harp)	1-story, concrete-block restaurant with mansard-like roof and plate-glass windows at front block	NC - age, outside HD's period of significance
<b>Burnett Boulevard (W and E sides)</b>			
1702 Burnett Blvd (Fig #9/Exh #89)	Former house now offices of City Parks Maintenance Division (1923 tax date)	1-story, gable-end, frame, vinyl-sided bungalow	PC – retains paired 2/2 windows, corner porch with wooden posts on brick piers, front dormer, and vinyl-clad triangular knee braces
1704 Burnett Blvd – Maintenance (Fig #9/Exh #90, 91)	City Parks Maintenance buildings (largely ca.1951-1955, per Sanborn maps, and later)	Eight functional, 1-story, concrete-block, steel, sheet metal, brick, plexiglass, and frame storage buildings, equipment sheds, cold frames and greenhouses	NC - age, outside HD's period of significance



ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
1704 Burnett Blvd – Park (Fig #9/Exh #92)	Park land	Undeveloped park land containing City Parks maintenance, offices, and forestry offices	Park land
1710 Burnett Blvd (Fig #9/Exh #93)	City Urban Forestry Division offices (ca. 1950s)	1-story, functional, gable-end, concrete-block building	NC - age, outside HD's period of significance
1739 Burnett Blvd (Fig #9/Exh #94)	Greenfield Lake Park (ca. 1925-1965)	195-acre city park with lake, gardens, fountains, cultural, and recreational resources	NC – not within HD's areas of significance (local landmark but found not individually NR-eligible)
<b>Simon Street (W and E sides)</b>			
1310 Simon St (Fig #7/Exh #95)	House (1910 tax date, but not on 1951 or 1955 Sanborns, so likely moved here)	1-story, frame, gable-end house with weatherboards, 2/2 sash, wooden surrounds	NC – altered by multiple additions including shed-roofed wing at north side and two-story addition at rear; altered front porch
1305 Simon St (Fig #7/Exh #96)	House (1930 tax date, but on 1915 Sanborn map)	1-story, gable-front, frame house with altered sash	PC – retains weatherboards, gable ventilator, wooden surrounds and cornerboards, (altered) full-façade porch, and small rear ell
<b>South 4th Street (W sides)</b>			
Northwest corner of junction of S 4th St and Martin St (Fig #8/Exh #97, 68)	Seaboard Air Line Railway/ Atlantic Coast Railroad District (NH3674)	100-foot-wide railroad right-of-way and tracks	PC - portion of 13-mile-long resource (determined eligible for NR listing in 2020) already included within Wilmington HD
<b>Meares Street (N side)</b>			
105 Meares St (Fig #7/Exh #98)	House (1907 tax date)	1-story, frame, gable-front house with intact triangular knee braces and transom over entry	NC – altered sash, aluminum siding, replaced posts and balusters at full-façade porch
111 Meares St (Fig #7/Exh #99)	House (1907 tax date)	1-story, frame, gable-front house with intact ventilator, surrounds, and returns	NC – altered asbestos siding, full façade porch posts, sash
113 Meares St (Fig #7/Exh #100)	House (1907 tax date)	1-story, gable-front, frame house with intact ventilator	NC – altered asbestos and Masonite siding, sash; half of porch enclosed, other half with later members
115 Meares St (Fig #7/Exh #101)	House (1917 tax date, but on 1915 Sanborn)	1-story, frame, gable-end house with vinyl over weatherboards and cornerboards	PC – intact 6/6 sash, wooden surrounds, porch posts; weatherboards visibly in place beneath vinyl siding
117 Meares St (Fig #7/Exh #102)	House (1937 tax date)	1-story, frame, multi-gabled, Craftsman bungalow	PC – intact weatherboards, 4/1 sash, wood surrounds and cornerboards, Craftsman porch with tapered posts on brick piers, decorative purlins and exposed rafter ends at wide roof overhang
119 Meares St (Fig #7/Exh #103)	Former corner store and, later, church (1937 tax date)	1-story, gable-front, weatherboarded, former store	NC – converted to church after 1955, store front windows

ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
			replaced by T-111 siding, doors changed, steeple added
201 Meares St (Fig #7/Exh #104)	House (1925 tax date, but on 1915 Sanborn)	1-story, gable-roofed, L-plan, frame house	NC – altered sash, doors, porch, vinyl siding
205 Meares St (Fig #7/Exh #105)	House (1925 tax date, but on 1915 Sanborn)	1-story, gable-front, frame house with later-added brick veneer	NC – altered sash, porch, brick-veneered after 1955
209 Meares St (Fig #7/Exh #106)	House (1917 tax date, but on 1915 Sanborn)	1-story, gable-front, frame house with wooden cornerboards	NC – altered sash, entry, porch posts, Masonite siding
211 Meares St (Fig #7/Exh #107)	Vacant lot	House lot on 1955 Sanborn map	V
213 Meares St (Fig #7/Exh #107)	Vacant lot	Part of 1024 S 3rd St lot on 1955 Sanborn map	V
<b>Meares Street (S side)</b>			
106 Meares St (Fig #7/Exh #108)	House (1920 tax date, but on 1910 Sanborn)	1-story, gable-end, frame house partially Masonite sided	PC – retains German siding at rear ell and central portion of front façade, which also retains some weatherboards, intact wood surrounds, most 6/1 sash intact
108 Meares St (Fig #7/Exh #108)	Vacant lot	House lot on 1955 Sanborn map	V
110 Meares St (Fig #7/Exh #109)	House (1902 tax date)	1-story, gable-front, frame house	NC – windows, Masonite siding, porch, surrounds date from 2018 renovation
114 Meares St (Fig #7/Exh #110)	House (1902 tax date)	1-story, frame, hipped-roof-with-façade-gable house	NC – modern windows, vinyl siding, porch, surrounds
118 Meares St (Fig #7/Exh #111)	House (1910 tax date)	1-story, gable-end, frame house	NC – altered sash, surrounds, bays, siding, porch
120 Meares St (Fig #7/Exh #112)	House (1945 tax date)	1-story, gable-end, frame house	NC – aluminum-siding, replaced sash, altered porch
202 Meares St (Fig #7/Exh #113)	House (1950 tax date)	1-story, frame, gable-end house	NC – replaced windows, Masonite siding, porch, room extended off of east side
208 Meares St (Fig #7/Exh #114)	House (1901 tax date)	1-story, frame, gable-end house with intact porch posts and cornice returns	NC -altered aluminum siding and surrounds, porch balustrade, snap-in 1/1 sash
210 Meares St (Fig #7/Exh #115)	House (2000 tax date)	1-story, frame, vinyl-sided, gable-front house	NC – modern Habitat for Humanity house
212 Meares St (Fig #7/Exh #116)	House (1901 tax date)	1-story, front-gabled, aluminum-sided house	NC – altered porch, sash, surrounds, porch
214 Meares St (Fig #7/Exh #117)	House (1901 tax date)	1-story, frame, gable-front house with full-façade porch with triangular knee braces in gable	NC – replaced sash, surrounds, vinyl siding, porch members
<b>Marstellar Street (N side)</b>			

ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
Vacant lots between 101 and 115 Marsteller St (Fig #7/Exh #118)	Vacant lots	Grassy lot held house and gravel lot held auto repair shop on 1955 Sanborn	V
115 Marsteller St (Fig #7/Exh #119)	House (1910 tax date)	1-story, gable-front, frame house with intact transom and pointed-arch front-gable window	NC – replaced siding, sash, porch members;
209 Marsteller St (Fig #7/Exh #120)	House (1927 tax date)	1-story, gable-end, frame house with original surrounds and 6/6 sash	NC – replaced asbestos siding, porch members; long east-facing porch on 1995 Sanborn removed
211 Marsteller St (Fig #7/Exh #121)	House (1927 tax date)	1-story, gable-end, frame house with altered two-bay porch, some modern sash	PC – intact German siding, wooden surrounds, triangular knee braces, and most 6/6 sash
<b>Marsteller Street (S side)</b>			
108 Marsteller St (Fig #7/Exh #122)	Vacant lot	Vacant lot on 1955 Sanborn	V
112 Marsteller St (Fig #7/Exh #122)	Vacant lot	Vacant lot on 1955 Sanborn	V
114 Marsteller St (Fig #7/Exh #122)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
116 Marsteller St (Fig #7/Exh #122)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
202 Marsteller St (Fig #7/Exh #123)	Pocket park	Pocket park on former house lot at southeast corner of junction of Marsteller St and S 2nd St	N – modern park on site of house on 1955 Sanborn map
208 Marsteller St (Fig #7/Exh #124)	House (2017 tax date)	Modern 1-story, gable-front, frame house with side dormers, full-façade porch	NC - age, outside HD's period of significance
210 Marsteller St (Fig #7/Exh #124)	Vacant lot	Vacant lot on 1955 Sanborn	V
214 Marsteller St (Fig #7/Exh #125)	Vacant lot	Vacant lot on 1955 Sanborn	V
216 Marsteller St (Fig #7/Exh #125)	Former Holy Church of Jesus Christ (1910 tax date, but newspapers indicate built ca. 1926)	1-story, frame, gable-front church with few alterations	PC – retains original German siding, 6/6 sash, surrounds, exposed rafter ends; interior retains original wood floor and beaded-board walls and ceiling
<b>Kidder Street (N side)</b>			
309 Kidder St (Fig #7/Exh #126)	Vacant house lot	Vacant lot that held one house on 1955 Sanborn	V
311 Kidder St (Fig #7/Exh #127)	House (1943 tax date)	1-story, frame, gable-front house	NC – altered siding, sash, fully enclosed front porch
<b>Kidder Street (S side)</b>			



ADDRESS (FIGURE NUMBER/EXHIBIT NUMBER)	TYPE AND/OR NAME (DATE)	DESCRIPTION	RECOMMENDED STATUS [PC=POTENTIALLY CONTRIBUTING; NC=NON-CONTRIBUTING; V=VACANT LOT]
304 Kidder St (Fig #7/Exh #128)	A house on 1955 Sanborn gone by early 2021, then a house moved to lot late 2021	1-story, frame, gable-front house up on blocks on lot in late 2021	NC – not on original site
306 Kidder St (Fig #7/Exh #129)	House (1945 tax date)	1-story, concrete-block, gable-front house	PC – intact stuccoed concrete-block house with two-bay front porch, original 6/6 sash
308 Kidder St (Fig #7/Exh #130)	House (1930 tax date)	1-story, gable-end, frame house	NC – altered sash, aluminum siding, porch
<b>Martin Street (N and S sides)</b>			
301-305 Martin St (Fig #8/Exh #131)	Townhouses (2019 tax date)	Three 2-story, frame and metal, gable-front townhouses	NC - age, outside HD's period of significance
307 Martin St (Fig #8/Exh #132)	Professional office (1948 tax date)	1-story, concrete-block, former warehouse or shop with bowstring truss roof	NC – front elevation and bays altered; shipping containers affixed to rear elevation
310 Martin St (Fig #8/Exh #133)	House (1955 tax date; 2019 tax date for remodeling)	1-story, gable-end, frame house with modern porch, vinyl siding, sash	NC - age, outside HD's period of significance
<b>Greenfield Street (S side)</b>			
110 Greenfield St (Fig #8/Exh #134)	New Anthem Brewery (1986 tax date)	Large, modern, steel brewery/warehouse/restaurant	NC - age, outside HD's period of significance
<b>Willard Street (S side)</b>			
200 Willard St (Fig #8/Exh #135)	Former Block Shirt/Southland Manufacturing Co (1957 tax date)	Surviving 1-story, flat-roofed, brick-veneered, masonry portion of once much-larger factory, which extended further east to Burnett Blvd, south, and north to site of New Anthem building complex (see 1955 Sanborn map, which does not include this building)	NC - age, outside HD's period of significance; also altered through changes to bays, entries, and windows

**South Front Street (from south of Wright St to south of Willard St—west side)**



**Exhibit 19: 1202 S Front St, facing southwest**



**Exhibit 20: 1402 S Front St, facing northwest**



**Exhibit 21: vacant lot at northwest corner of junction of S Front St and Greenfield St (1404 S Front St), facing south**



**Exhibit 22: vacant lot at southwest corner of junction of S Front St and Greenfield St (1530 S Front St), facing southwest**



**Exhibit 23: 1536A S Front St, facing southwest**



**Exhibit 24: 1536B S Front St, facing northwest**





**Exhibit 25: 1602 S Front St, facing northwest**



**Exhibit 26: former Optimist Park between Willard St and junction of S Front and Burnett Blvd (1650 S Front St), facing south**

**South Front Street (from south of Wright St to south of Willard St—east side)**



**Exhibit 27: six vacant former house lots (102 Wright St) at northeast corner of junction of S Front St and Meares St, facing north**



**Exhibit 28: vacant lot at top center (no address) at southeast corner of junction of S Front St and Meares St, facing northeast**



**Exhibit 29: 1105 S Front St, facing southeast**



**Exhibit 30: two vacant former house lots between 1105 S Front St and 101 Marsteller St, facing northeast (source: Google Maps)**





**Exhibit 31: vacant lot at northeast corner of junction of S Front St and Kidder St, facing southeast**



**Exhibit 32: 1525 S Front St, facing southeast**

**South 2nd Street (from south of Wright St to north of Kidder St—west side)**



**Exhibit 33: 1014 S 2nd St (NH2062), facing northwest**



**Exhibit 34: 1016 S 2nd St (NH2062), facing northwest**



**Exhibit 35: 1104 S 2nd St (NH2603), facing northwest**



**Exhibit 36: 1106 S 2nd St (NH2603), facing southwest**





**Exhibit 37: 1112 S 2nd St (NH2603), facing southwest**



**Exhibit 38: 1206 S 2nd St (NH2604), facing southwest**



**Exhibit 39: 1208 S 2nd St (NH2604), facing northwest**



**Exhibit 40: vacant house lot between 1208 and 1216 S 2nd St (1210 S 2nd St) (NH2604), facing southwest**



**Exhibit 41: 1216 S 2nd St (NH2604), facing northwest**



**Exhibit 42: 1218 S 2nd St (NH2604), facing southwest**