



Phase I Background Investigation for the Hulsey Yard Tower

TCNS 267278

Fulton County, Georgia

May 2023



Phase I Background Investigation for the Hulsey Yard Tower, Fulton County, Georgia

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Abstract

Under contract to CSX Transportation, Inc. (CSX), HDR conducted a Phase I background investigation for the Hulsey Yard Tower (TCNS 267278), Fulton County, Georgia (Latitude 33.75066, Longitude -84.37196; UTM Zone 16S, 743433.52 E, 3737613.27 N). The proposed tower is a 60-foot-tall mast self-supporting structure with a 10-foot antenna. The direct Area of Potential Effects (APE) is less than 100 square feet within existing railroad right-of-way. The purpose of the investigation was to identify previously recorded historic properties within designated APEs and recommend follow-up survey if necessary. The investigation was completed to assist CSX in meeting its regulatory obligations pursuant to the Nationwide Programmatic Agreement for the Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA; FCC 2004).

In May 2023, HDR requested data from the Georgia Archaeological Site File (GASF) on all archaeological sites within 1 mile of the proposed project. The search for aboveground historic properties consisted of desktop research, including online resources provided by Georgia's Natural, Archaeological, and Historic Resource Geographic Information System (GNAHRGIS), the National Park Service's (NPS) National Register of Historic Places (NRHP) GIS dataset, and Georgia's Statewide Railroad Context (GDOT 2018).

This report presents the results of the cultural resources literature search completed for the proposed **Hulsey Yard Tower** in **Fulton County**, Georgia. HDR understands that the Federal Communications Commission (FCC) will be the federal agency responsible for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, and implementation of regulations found at 36 Code of Federal Regulations (CFR) 800. The project's APE is defined here as the footprint of the proposed tower for direct effects and a 0.5-mile radius from the proposed tower location for visual effects, as defined in the 2004 NPA.

The Phase I background investigation of the Hulsey Yard Tower project identified nine previously recorded archaeological sites within a 1-mile radius of the direct APE. No archaeological sites have been recorded within the direct APE. Due to the disturbed nature of the project location and the small area of ground disturbance required, there is little to no potential to impact intact archaeological resources. For built resources, the NRHP-eligible Georgia Railroad (GAR) corridor intersects the APE. The proposed tower's presence within an active railroad ROW would not diminish the rail corridor's setting or limit the ability of the NRHP-eligible corridor to convey its historic, architectural, and engineering significance. Additionally, seven NRHP-listed historic districts, two individually NRHP-listed buildings, and seventeen NRHP-eligible buildings are located within the 0.5-mile visual APE. The proposed tower's presence would not diminish these resources or limit their ability to convey their historic significance. The project, therefore, will have no adverse effect on any previously recorded historic properties. HDR recommends a finding of **No Adverse Effect** for this project and additionally recommends no further cultural resources work for the Hulsey Yard Tower project, as defined in this report.



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Introduction

Under contract to CSX Transportation, Inc. (CSX), HDR conducted a Phase I background investigation for the Hulsey Yard Tower (TCNS 267278), Fulton County, Georgia (Latitude 33.75066, Longitude -84.37196; UTM Zone 16S, 743433.52 E, 3737613.27 N). The purpose of the investigation was to identify previously recorded historic properties within designated Areas of Potential Effects (APEs). The investigation was completed to assist CSX in meeting its regulatory obligations pursuant to the Nationwide Programmatic Agreement for the Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission (NPA; FCC 2004).

Area of Potential Effects

The process for determining APEs (direct and visual) is outlined in the 2004 NPA between the FCC, the Advisory Council on Historic Preservation (ACHP), and the National Conference of State Historic Preservation Officers (NCSHPO) in Section VI: Identification, Evaluation, and Assessment of Effects. The project's direct APE is defined here as the footprint of the proposed tower. The direct APE is less than 100 square feet within existing railroad right-of-way (ROW). In Section VI.C.3, the APE for visual effects is defined as "the geographic area in which the Undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, where the setting is a character-defining feature of a Historic Property that makes it eligible for listing in the National Register" (FCC 2004). The proposed tower is a 60-foot-tall mast self-supporting structure with a 10-foot-tall antenna. In accordance with the NPA, a 0.5-mile visual APE was used to assess visual impacts on aboveground historic properties. A 1-mile study area was assessed for previously identified archaeological sites and previously conducted surveys (Appendix A, Figure 1 and Figure 2).

Section VI.D.1 of the NPA states that only the records at the state historic preservation office (SHPO) are to be reviewed, "with respect to these properties, Applicants are not required to undertake a Field Survey or other measures other than reviewing these records in order to identify Historic Properties" (FCC 2004:17). HDR cultural resources specialist Amy Leuchtmann began the Phase I background investigation by requesting data on all archaeological sites within 1 mile of the proposed project from the Georgia Archaeological Site File (GASF) in May 2023. Ms. Leuchtmann reviewed the results of the archaeological data request in May 2023. HDR architectural historian Marcus Huerta conducted the Phase I background investigation for aboveground historic properties in May 2023, using Georgia Natural, Archaeological, and Historic Resources Geographical Information System (GNAHRGIS), the National Park Service's (NPS) National Register of Historic Places (NRHP) dataset, and Georgia's Statewide Railroad Context (GDOT 2018) for information on previous historic surveys and previously recorded historic properties.



Previous Investigations and Known Archaeological Sites

Twenty-one surveys have been conducted within 1 mile of the direct APE (Table 1), none of which intersect the direct APE. Nine archaeological sites have been recorded within 1 mile of the project location (Table 2). One site, 9FU245, was recommended as eligible for the NRHP, two sites were recommended as ineligible for the NRHP, and six sites have an undetermined NRHP status. GASF data indicates that no archaeological sites have been recorded within the direct APE.

Table 1. Previous Surveys within 1 Mile of Project

| Survey No. | Agency | Project | Contractor | Author | Year |
|------------|------------|--|--|--------------------------------|------|
| 2031 | GA DNR HPD | A Cultural Resources Survey of the Proposed Improvements to Six Bridges, Atlanta, Fulton County, Georgia | Southeastern Archeological Services, Inc. | Thomas J. Pluckhahn | 2000 |
| 3511 | GDOT | Phase I Archaeological Survey of Georgia State University Improvements Project, Piedmont Avenue, Atlanta, Fulton County, Georgia | EDAW, Inc. | ** | 2006 |
| 4124 | GA DNR HPD | Archaeological and Architectural Evaluation of the Atlanta Police Headquarters Block, Fulton County, Georgia | Brockington and Associates, Inc. | ** | 1998 |
| 5487 | GDOT | Archaeological Assessment of Project NH-7141-00(100), DeKalb County | n/a | Paul McIntosh and Eric Anthony | 2001 |
| 5740 | GDOT | Projects DPI-0010(001)CT 19, CM-00MS(119) & DPI-0010(001)CT 31, Fulton County: Advanced Traffic Management System | n/a | Gail A. D'Avino and Bob Entorf | 1995 |
| 5770 | GDOT | Archaeological Assessment of Project IR-20-2(75), Fulton-DeKalb Counties | n/a | William R. Bowen | 1985 |
| 5924 | GDOT | Signal Upgrades at Nineteen Intersections in the City of Atlanta | HNTB Corp. and Southeastern Archeological Services, Inc. | ** | 2010 |
| 7029 | GDOT | Phase I Archaeological Survey of the Marta I-20 East Corridor Alternatives, DeKalb and Fulton Counties, Georgia | Edwards-Pitman Environmental, Inc. | ** | 2013 |
| 7434 | GDOT | Intersection Improvement at SR 10/Freedom Parkway and Boulevard | n/a | P. Baughman | 2013 |



Table 1. Previous Surveys within 1 Mile of Project

| Survey No. | Agency | Project | Contractor | Author | Year |
|------------|------------|---|--|--------------------|------|
| 7647 | GDOT | SR 154/Memorial Dr. Pedestrian Connectivity from Fraser Street to Connally Street, Fulton County, Georgia | n/a | Heather Mustonen | 2012 |
| 8499 | NPS | Monitor of Statue Foundation Excavation, Martin Luther King, Jr. National Historic Site | n/a | Harry Scheele | 1989 |
| 8554 | GA DNR HPD | Cultural Resources Assessment of 148 and 158 Edgewood Avenue, Atlanta, Georgia | Brockington and Associates, Inc. | ** | 2006 |
| 8978 | GDOT | Second Addendum to the Phase I Archaeological Survey Courtland Street Bridge at the CSX Railroad Bridge Replacement, Fulton County, Georgia | Edwards-Pitman Environmental, Inc. | ** | 2012 |
| 10258 | GDOT | Archaeological Assessment of Project STP-9124(10), Fulton County | n/a | Rick R. Richardson | 1998 |
| 11859 | GDOT | Bridge Categorical Exclusion – BRMLB-9007(12), Fulton County | n/a | ** | ** |
| 12998 | GDOT | Phase I Archaeological Survey of Proposed Maintenance Improvements along Sr 154/Memorial Drive from its Intersection with Pearl Street to its Intersection with Candler Road Southeast in DeKalb and Fulton Counties, Georgia | n/a | Michael Carlock | 2018 |
| 13459 | GDOT | Archaeological Assessment of a Fulton County Resurfacing Project | n/a | Eric A. Duff | 2007 |
| 13747 | GA DNR HPD | Section 106 Review: TCNS ID 162870, Proposed 49-foot Overall Height Pole Structure | Environmental Corporation of America | ** | 2017 |
| 14033 | | | | | |
| 14033 | GDOT | Signal Upgrades at Nineteen Intersections in the City of Atlanta | Southeastern Archeological Services, Inc | Thomas Gresham | 2010 |

** Information not provided in GASF data

Table 2. Recorded Archaeological Sites within 1 Mile of Project

| Site No. | Type | NRHP Status |
|----------|------------------|--------------|
| 9FU106 | Oakland Cemetery | Undetermined |



Table 2. Recorded Archaeological Sites within 1 Mile of Project

| Site No. | Type | NRHP Status |
|----------|--|--------------------------|
| 9FU195 | Architectural remains of Atlanta Milling Company | Recommended Ineligible |
| 9FU245 | Historic trolley line | Recommended Eligible |
| 9FU536 | Historic artifact scatter | Undetermined |
| 9FU549 | Architectural remains of warehouse | Undetermined |
| 9FU577 | Historic trolley line | Undetermined - destroyed |
| 9FU687 | 20 th century railroad coal yard | Undetermined |
| 9FU756 | Historic artifact redeposit | Undetermined |
| 9FU786 | Urban residential and commercial | Recommended Ineligible |

Known Aboveground Historic Properties Investigations

The record search revealed that the direct APE is located within the former Georgia Railroad (GAR) Mainline corridor, a contributing resource to the NRHP-eligible GAR corridor. Twenty-six NRHP-listed, contributing, or eligible properties are located within the 0.5-mile visual APE (Table 3).

Table 3. Previously Recorded Historic Properties within 0.5 Mile of Project

| NRHP Reference Number/GNHRGIS number | Resource | Address | NRHP Status/GNHRGISStatus |
|--------------------------------------|--|--|-----------------------------|
| 76000623 | Cabbagetown District | Bounded by Boulevard, Pearl St., Memorial Dr., and railroad tracks | Listed (1976) |
| 76000627/80674 | Oakland Cemetery | 248 Oakland Ave., SE | Listed (1976) |
| 86000462 | Grant Park North | Roughly bounded by Woodward Ave., Boulevard, I-20, and Hill St. | Listed (1986) |
| 74000677 | Martin Luther King, Jr. Historic District | Bounded roughly by Irwin, Randolph, Edgewood, Jackson, and Auburn Aves. | NHL; Listed (1974) |
| 00000741 | Martin Luther King, Jr. Historic District (Boundary Increase) | Roughly bounded by Freedom Pkwy., John Wesley Dobbs Ave., Decatur St., Southern RR tracks, and I-75/85 | Listed (2001) |
| 80000435 | Martin Luther King, Jr. National Historic Site and Preservation District | Roughly bounded by Courtland, Randolph, Chamberlain Sts. and Irwin Ave. | Listed (1980) |
| 76000631 | Sweet Auburn Historic District | Along Auburn Avenue | NHL; Listed (1976) |
| 95001135 | Orr, J. K., Shoe Company | 16 William Holmes Borders, Sr. Avenue | Listed (1995); Contributing |
| 07000088 | Southern Spring Bed Company | 300 Martin Luther King, Jr. Drive | Listed (2007) |



Table 3. Previously Recorded Historic Properties within 0.5 Mile of Project

| NRHP Reference Number/GNHRGIS number | Resource | Address | NRHP Status/GNHRGIS Status |
|--------------------------------------|------------------------------------|--|----------------------------|
| N/A | Georgia Railroad | Former Georgia Railroad Mainline alignment (present-day CSXT Atlanta Terminal Subdivision) | Eligible (GDOT 2018) |
| 274761 | Domestic multiple dwelling | 319 Auburn Ave | Eligible |
| 274764 | Domestic multiple dwelling | 14 Hilliard Drive NE | Eligible |
| 32097 | Commercial building | 321-325 Edgewood Ave SE (originally 287-289 Edgewood) | Eligible* |
| 32108 | Commercial building | 363-367 Edgewood Ave SE | Eligible* |
| 32164 | Domestic single dwelling | 367 Edgewood Ave SE | Eligible* |
| 32110 | Bentons Auto Service | 377 Edgewood Ave SE | Eligible* |
| 32115 | Commercial building | 382-384 Edgewood Ave | Eligible* |
| 31924 | Southern Stamp and Stencil Company | 428 Edgewood Ave | Eligible* |
| 31817 | Commercial building | 443-445 Edgewood Ave, SE | Contributing/Eligible |
| 31818 | Commercial building | 444-446 Edgewood Ave, NE | Contributing/Eligible |
| 31823 | FKA Danneman's Supermarket | 466 Edgewood Ave SE | Contributing/Eligible |
| 31824 | Brown Hayes Department Store | 467 Edgewood Ave SE | Contributing/Eligible |
| 31825 | Commercial building | 476 Edgewood Ave NE | Contributing/Eligible |
| 31832 | Commercial building | 488-490 Edgewood Ave, NE | Contributing/Eligible |
| 31834 | The Edgewood Lofts | 510 Edgewood Ave NE | Contributing/Eligible |
| 31837 | Roane Building | 541 Edgewood Ave, SE | Contributing/Eligible |
| 32034 | F.K.A. Atlanta Cabinet Shop | 591-595 Edgewood Ave | Eligible* |

*These buildings presumably contribute to the Martin Luther King, Jr. Historic District (Boundary Increase), see explanation below.



Effects Discussion

Archaeological Resources

No previously identified archaeological resources are located within the direct APE. The location's soil consists of Lawrence silt loam, 0 to 4 percent slopes, rarely flooded; a shallow, somewhat poorly drained soil found within stream terraces (USDA 2023). The 100-square-foot direct APE (Appendix B, Figure 5 through Figure 8) is located within the active CSX ROW that has been the site of construction activities including grading/leveling, compaction, and the replacement of ballast, ties, and rails since the mid- nineteenth century. There is little to no potential for tower installation to impact intact subsurface archaeological deposits due to the disturbed nature of the project area.

Related to direct effects, Section VI.D.2(a) of the 2004 NPA states that the Applicant should make a good faith effort to identify sites/properties in the direct APE, which may include field survey, and Section VI.D.2(b) allows for a Secretary of the Interior (SOI) qualified individual to determine that a field survey is not required as long as such evidence is provided to meet criteria in Section VI.D.2(c). These criteria are: 1) the depth of previous disturbance exceeds the proposed construction depth (excluding footings and other anchoring mechanisms) by at least 2 feet as documented in the Applicant's siting analysis; or 2) geomorphological evidence indicates that cultural resource-bearing soils do not occur within the project area or may occur but at depths that exceed 2 feet below the proposed construction depth. Information supporting these criteria is presented throughout this report. Should an interested party possess information supporting a high probability of the presence of intact archaeological sites within the APE for direct effects, HDR must be notified of such information pursuant to Section VI.D.2(e) of the 2004 NPA.

Aboveground Resources

According to the 2004 NPA, Stipulation VI.A.3, "the APE for visual effects is the geographic area in which the Undertaking has the potential to introduce visual elements that diminish or alter the setting, including the landscape, *where the setting is a character-defining feature of a Historic Property* (emphasis added) that makes it eligible for listing on the National Register" (FCC 2004:16). Under this guidance, if setting is not a contributing element to the eligibility of a historic property, potential adverse effects resulting from changes within a property's viewshed are limited, as those changes are less likely to impact the property's ability to convey its historic, architectural, and/or engineering significance.

The direct APE (which measures less than 100 square feet) is located within the former GAR Mainline corridor, a contributing resource to the NRHP-eligible GAR system (Appendix B, Figure 9 and Figure 10). Additionally, seven NRHP-listed historic districts, two individually NRHP-listed buildings, and seventeen NRHP-eligible buildings are located within the 0.5-mile visual APE.

GAR Mainline Corridor

The former GAR corridor extends northeast–southwest through the APE. The direct APE is located on the south side of the rail alignment west of Boulevard Southeast and the CSX railyard driveway. GDOT has recommended the former GAR Mainline a contributing resource to the

NRHP-eligible GAR system, eligible under Criterion A in the areas of Commerce, Community Planning and Development, Exploration/Settlement, Transportation, and Military; and under Criterion C in the areas of Engineering and Architecture (GDOT 2018: Appendix E, GAR 18). The proposed NRHP boundary of the GAR corresponds to the “...current and historic railroad corridor rights-of-way of all contributing lines and/or sections,” and “...any locations along each of the corridors where there are intact depots located outside of rail rights-of-way...as well as any intact platforms or docks, and any intact sidings or rail yards” (GDOT 2018: Appendix E, GAR 18). As such, the proposed tower site within the former GAR ROW (now owned and operated by CSX), is located within the NRHP boundary of the GAR corridor. GDOT identified 1833 to 1982 as the period of significance for the GAR corridor.

The addition of a communications tower within the current railroad ROW is a component of regular maintenance that railroad companies undertake to maintain safe and efficient rail operations. Though the proposed tower introduces a modern infrastructure element within the boundary of the NRHP-eligible GAR corridor, the tower’s presence within an active railroad ROW would not diminish the rail corridor’s setting (not noted as a character-defining feature) or limit the ability of the NRHP-eligible corridor to convey its significance. The project would introduce one modern component into the corridor in order to maintain ongoing rail function. Therefore, the project would neither diminish the integrity of the historic property nor diminish the historic property’s ability to convey its significance.

Historic Districts in the 0.5-mile Visual APE

The boundaries of three NRHP-listed historic districts—Oakland Cemetery (Lyon and Combs 1975), Cabbagetown District (Brook et al. 1975), and the Martin Luther King, Jr. Historic District (Boundary Increase) (Kissane 1998)—are adjacent to the CSX ROW at the Hulsey Yard, but do not overlap it. Four of the districts, including Martin Luther King, Jr. Historic District (Macgregor and Summers 1974), the Martin Luther King, Jr. National Historic Site and Preservation District (Blythe, Carroll, and Moffson 1993), Sweet Auburn Historic District (Gomez-Graves 1976), and Grant Park North Historic District (Thomas 1986) have boundaries within the project’s 0.5-mile visual APE.

OAKLAND CEMETERY

The NRHP-listed Oakland Cemetery (NRHP# 76000627) is historically significant in the areas of Art, Landscape Architecture, Sculpture, and Cultural History, with a period of significance from 1850 to 1935. The district’s nomination does not indicate its NRHP Criteria, which are presumed to be Criteria A and C, nor does it indicate its level of significance, which is presumed to be local. The 88-acre cemetery is in a hilly section east of downtown Atlanta, and with its abundance of Magnolia and Chestnut trees is noted as a landscape ideal of nineteenth century cemetery-park design (Appendix B, Figure 11) (Lyon and Combs 1975). The CSX railyard is immediately adjacent to the cemetery on its northern perimeter and the proposed antenna site is 175 feet (0.03 mile) from the cemetery’s north wall.

Although the proposed antenna would be plainly visible from the cemetery, several circumstances would attenuate its potential effect. As the railroad’s construction in 1837 precedes the establishment of the Oakland Cemetery by thirteen years, the proximity of rail and rail-related infrastructure has always been part of the district’s surrounding setting (Appendix B, Figure 12).



Similarly, the Fulton Bag and Cotton Mills complex, which contributes to the NRHP Cabbagetown District, is across Boulevard Southeast from the cemetery and includes several multi-story buildings and two ca. 1899 brick masonry smokestacks visible from throughout the park (Appendix B, Figure 13) (Brooks, et al., 1975). The cemetery's long-time proximity to such resources is well established and did not preclude it from NRHP eligibility and listing.

Per NRHP Criterion Consideration D regarding the qualification of cemeteries based on design values, including landscape architecture, Oakland Cemetery's nomination discusses its design as a break from previous attitudes towards death and the deceased, and a turn towards cemeteries as pleasant places of visitation and reflection through carefully composed natural landscapes. Specifically, Oakland's design is significant for the manner in which its romantic features such as hilly topography, winding drives, secluded groves, naturalistic clumps of trees and foliage enhance its rich collection of Victorian cemetery art (Lyon and Combs 1975). The proposed Hulsey Yard Tower would not alter these internal design relationships, nor would it diminish the cemetery's integrity or ability to convey its historic significance under Criteria A and C.

CABBAGETOWN DISTRICT

The NRHP Cabbagetown District (NRHP# 76000623) is west of the CSX ROW and partially within the 0.5-mile visual APE. The district is historically significant in the areas of Architecture, Commerce, Community Planning, Industry, and Social History, and its period of significance is from 1881 to 1956. Based on the identified areas of significance, the district is presumably historic under Criteria A and C at the local level of significance. The district is historically significant as a mill town complex that exemplifies late nineteenth and early twentieth century development of manufacturing mills with associated mill villages in Georgia (Brook et al 1975). The district's west end is immediately adjacent to the CSX ROW and approximately 430 feet (0.08 mile) east of the proposed tower site. Setting is not identified or implied as one of the district's character-defining features. The district is comprised of two elements—the industrial mill complex on the far west side of the irregularly-shaped district, and the residential mill town neighborhood to the east. The mill complex is comprised of several multistory industrial buildings, including two approximately 10-story smokestacks. The nomination notes that there was no landscaping at the mill site during the period of significance. Although the proposed tower would be plainly visible from the west side of the historic district, its size and scale is consistent with the Cabbagetown mill complex's industrial character (Appendix B, Figure 14). Further, the mill complex would block view of the proposed antenna from the residential section to the east. The proposed tower's presence would not diminish the district's setting (not noted as a character-defining feature) or limit its ability to convey its significance under Criterion A and C.

MARTIN LUTHER KING, JR. HISTORIC DISTRICT (BOUNDARY INCREASE)

The 280-acre Martin Luther King, Jr. Historic District (Boundary Increase) (00000741) is north of the CSX ROW within the 0.5-mile visual APE. The proposed antenna site is 486 feet (0.09 mile) from Todd Street, the district's southern boundary. The district entirely encompasses the original 76-acre Martin Luther King, Jr. Historic District (1974), the 15.4-acre Martin Luther King, Jr., National Historic Landmark (1977), and portions of the 38-acre Martin Luther King, Jr., National

Historic Site and Preservation District (1980). The district, which amends and expands upon the 1974 Martin Luther King, Jr. Historic District (NRHP# 74000677), is historically significant under Criteria A, B, and C in the areas of Black Ethnic Heritage; Social History; Community Planning and Development; Commerce, Architecture, Religion, Landscape Architecture, Education, Industry, and Transportation. The district is recognized at the national, state, and local levels of historic significance, its period of significance is ca. 1853 to 1968, and it recognizes multiple significant dates and persons (Moffson and Kissane 2001).

The district's nomination indicates its historic landscape architecture is related to its residential landscaping and streetscape treatments throughout the Auburn Avenue Community. In terms of landscaping, residential yard spaces define relationships between buildings in the district and include character defining features such as front walks centered on front doors and perpendicular to streets, front yards enclosed by hedges or fences, narrow side yards, and fairly large utilitarian rear yards enclosed with fences. Characteristics of the district's historic streetscape include consistent building setbacks that create a rhythm of uninterrupted porches and main facades, streets of varying width, sidewalk widths, and the two-way traffic flow (Kissane 1998: 15-16, 27).

Intervening buildings, infrastructure, and vegetation obscures views from much of the Martin Luther King, Jr. Historic District (Boundary Increase) to the proposed tower site, and views from its southern boundary (Todd Street) are also partially obscured by the piers supporting the elevated MARTA tracks (Appendix B, Figure 15). Regarding landscape architecture, the proposed Hulsey Yard Tower would not alter character defining landscaping and streetscape treatments. The nomination indicates the rail corridor has been an integral part of the neighborhood since the beginning of the twentieth century, and the proposed tower would not diminish the district's integrity or ability to convey its historic significance under Criteria A, B, and C.

MARTIN LUTHER KING, JR. NATIONAL HISTORIC SITE AND PRESERVATION DISTRICT

The NRHP Martin Luther King, Jr. National Historic Site and Preservation District (NRHP# 80000435), which is partially within the 0.5-mile visual APE, is historically significant under Criteria A, B, and C in the areas of Black Ethnic Heritage, Social History, Commerce, and Architecture. Its southern boundary along Edgewood Avenue is approximately 1,300 feet (0.25 mile) north of the proposed tower site. The district's period of significance is from ca. 1880 to 1968 (Blythe et al, 1993). Setting is not identified or implied as one of the district's character-defining features. The district is comprised of buildings that are historically domestic, religious, and commercial in use. The district's setting has been historically urban in character and the view of the project site is largely or entirely obstructed (Appendix B, Figure 16). The proposed tower would not diminish the district's integrity or ability to convey its historic significance under Criteria A, B, and C.

SWEET AUBURN HISTORIC DISTRICT

The NRHP Sweet Auburn Historic District (NRHP# 76000631) is northwest of the CSX ROW and partially within the 0.5-mile visual APE. The irregularly shaped district's east end along Southeast Edgewood Avenue is approximately 2,560 feet (0.49 mile) northwest of the proposed tower site. The district is historically significant in the areas of Commerce, Economics, Social History, and Black History, and its period of significance is from 1865 to 1930 (Gomez-Graves 1976). Based on the identified areas of significance, the district is presumably historic under Criteria A and C at the local level of significance. Setting is not identified or implied as one of the



district's character-defining features. The district is comprised of buildings historically in commercial, educational, entertainment, and religious use. It is urban in character and the elevated Interstate Highway 85, along with intervening buildings, infrastructure, and vegetation obscures views from the district to the proposed tower site (Appendix B, Figure 17). The proposed tower's presence would not diminish the district's setting (not noted as a character-defining feature) or limit its ability to convey its significance under Criterion A and C.

GRANT PARK NORTH DISTRICT

The NRHP-listed Grant Park North District (NRHP# 86000462) is south of the CSX ROW and partially within the 0.5-mile visual APE. The irregularly shaped district's north end along Southeast Woodward Avenue is approximately 1,890 feet (0.36 mile) south of the proposed tower site. The district is historically significant under Criteria A and C in the areas of Architecture, Community Planning, and Landscape Architecture. Its period of significance is from ca. 1880 to 1930 and it is presumably historic at the local level of significance (Thomas 1986). The district's nomination indicates its landscape architecture is historically significant for its street trees, sidewalk paving, retaining walls, plantings, and street grid pattern that exemplify turn of the century neighborhood design. This combination of small to large-scale elements and their relationships with each other are internal to the neighborhood and the proposed tower's presence would not diminish the district's setting. Furthermore, the industrial area north of the district, including the NRHP Cabbagetown District's smokestacks, has been a part of the landscape since the 1930s. Although the proposed tower site would be plainly visible from Southeast Woodward Avenue (Appendix B, Figure 18), the district's ability to convey its significance under Criteria A and C would not be impaired.

NRHP-Listed Buildings in the 0.5-mile Visual APE

NRHP J.K. ORR SHOE COMPANY

The NRHP-listed J.K. Orr Shoe Company building (NRHP #95001135) is northwest of the CSX ROW within the 0.5-mile visual APE. It is approximately 1,560 feet (0.30 mile) northwest of the proposed tower site. The building is historically significant under Criteria A, B, and C in the areas of Architecture and Industry at the local level of significance. The building's period of significance is from 1907 to 1937 and its setting is not indicated or implied as a character defining feature (Raflo 1995). In 2001 the building was designated as contributing to the Martin Luther King, Jr. Historic District (Moffson and Kissane 2001). The building is described as a good representative example of early twentieth century functional design for large industrial buildings and was designed by architect A. Francis Walker. View of the proposed tower site is obscured by intervening buildings, infrastructure, and vegetation (Appendix B, Figure 19). The obscured view limits the potential effects resulting from the proposed tower.

NRHP SOUTHERN SPRING BED COMPANY

The NRHP-listed Southern Spring Bed Company (NRHP# 07000088) is southwest of the CSX ROW within the 0.5-mile visual APE. It is approximately 2,000 feet (0.38 mile) northwest of the proposed tower site. The complex is historically significant under Criteria A and C in the areas of Architecture and Industry at the local level of significance. The building's period of significance is from 1920 to 1956 and its setting is not indicated or implied as a character defining feature (Brock and Ray 2006). In terms of architecture, the four-building complex is described as a

good example of an early to mid-twentieth century fireproof manufacturing complex. The buildings' design is strictly functional with an exterior comprised of smooth-finish concrete and steel casement windows. View of the proposed tower site is obscured by intervening buildings, infrastructure, and vegetation (Appendix B, Figure 20). The obscured view limits the potential effects resulting from the proposed tower.

NRHP-Eligible and -Contributing Buildings in the 0.5-mile Visual APE

A total of 17 buildings in the visual APE are identified in GNAHRGIS as eligible for listing in the NRHP. GNAHRGIS identifies explicit eligibility criteria, areas of significance, and periods of significance for two of these buildings (274761 and 274764). Eight of the buildings (31817, 31818, 31823, 31824, 31825, 31832, 31834, and 31837) contribute to the NRHP Martin Luther King, Jr. National Historic Site And Preservation District per the district's NPS nomination form. The remaining 7 buildings (32097, 32108, 32164, 32110, 32115, 31924, and 32034) are within the expanded Martin Luther King, Jr. Historic District and, as they meet district eligibility requirements, presumably contribute to the historic district.

The apartment buildings at 319 Auburn Avenue (274761) and 14 Hilliard Drive Northeast (274764) have been determined eligible for inclusion in the NRHP under Criterion A in the area of Community Planning and Development with a period of significance from 1917 to 1939. The buildings are historically significant examples of the duplex house form that provided a smaller scale alternative to large apartment complexes for workforce families (Simo 2020a, 2020b). Their settings are not identified or implied as a character-defining feature. The buildings are approximately 2,340 feet (0.44 mile) northwest of the proposed tower site. Views of the proposed tower site are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

NRHP MARTIN LUTHER KING, JR. NATIONAL HISTORIC SITE AND PRESERVATION DISTRICT

The building at 443-445 Edgewood Ave SE (31817) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The one-part commercial block was constructed ca. 1909 but is not designed in any specific academic style (Moffson 1992a). The building is 1,300 feet (0.25 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 444-446 Edgewood Avenue (31818) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The Italianate-style two-part commercial block was constructed in 1909 (Moffson 1992b). The building is 1,430 feet (0.27 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.



The building at 466 Edgewood Avenue (31823) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The two-part commercial block was constructed in 1909 (Carroll 1992a). The building is 1,410 feet (0.27 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 467 Edgewood Avenue (31824) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The two-part commercial block was constructed in 1899 (Carroll 1992b). The building is 1,260 feet (0.24 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 476 Edgewood Avenue (31825) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The Romanesque Revival-style two-part commercial block was constructed in 1909 (Carroll 1992c). The building is 1,390 feet (0.26 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 488-490 Edgewood Avenue (31832) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The two-part commercial block was constructed in 1909 (Carroll 1992d). The building is 1,386 feet (0.26 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 510 Edgewood Avenue (31834) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The former light industrial building was constructed in 1947 and has International-style design details (Moffson 1992c). The building is 1,450 feet (0.27 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 541 Edgewood Avenue (31837) contributes to the NRHP Martin Luther King, Jr. National Historic Site and Preservation District and is identified in GNAHRGIS as NRHP-eligible. The Roane Building, an Italian Renaissance Revival two-part commercial block was constructed

in 1906 (Moffson 1992d). The building is 1,417 feet (0.27 mile) from the proposed tower site. The building's GNAHRGIS record does not indicate or imply its setting is a character defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

MARTIN LUTHER KING, JR. HISTORIC DISTRICT (BOUNDARY INCREASE)

The following buildings within the 0.5-mile visual APE are within the Martin Luther King, Jr. Historic District (Boundary Increase). The nomination's supporting documentation does not indicate contributing and non-contributing buildings specifically by street address. Concerning status, the nomination's supporting documentation states, "[c]ontributing resources in this district are those constructed between c.1853 and 1968 that retain all or most aspects of historic integrity and are associated with a historic theme for which the historic district is significant. Noncontributing resources are those constructed after 1968 and those that no longer add to the historic district's sense of time and place and historical development because of additions, alterations, or destruction after 1968" (Moffson and Kissane 2001:24). Based on a conservative approach and the criteria listed in the nomination form, they are presumed to be contributing to the Martin Luther King, Jr. Historic District (Boundary Increase), though they are not identified as such in GNAHRGIS.

The building at 321-325 Edgewood Avenue (32097) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The two-part commercial block was constructed ca. 1909 and has light Colonial Revival styling (Mizell Rivers 1993b). The building is 2,000 feet (0.38 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 363-367 Edgewood Ave SE (32108) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The two-part commercial block was constructed ca. 1897 but is not designed in any specific academic style (Mizell Rivers 1993c). The building is 1,710 feet (0.32 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 367 Edgewood Ave SE (32164) (formerly 11 Yonge Street) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The two-story Queen Anne-style dwelling was constructed ca. 1900 (Mizell Rivers 1993a). The building is 1,660 feet (0.31 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.



The building at 377 Edgewood Ave SE (32110) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The building is an Art Deco-style former gasoline station constructed in 1931 (Mizell Rivers 1993d). The building is 1,610 feet (0.31 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 382-384 Edgewood Avenue (32115) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The Romanesque Revival-style two-part commercial block was constructed in 1900 (Mizell Rivers 1993e). The building is 1,670 feet (0.32 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 428 Edgewood Avenue (31924) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The industrial building is of no academic style and was constructed in 1954 (Mizell Rivers 1993f). It is notable for being one of the few buildings along Edgewood Avenue that includes a setback with sufficient space for parking. The building is 1,520 feet (0.29 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

The building at 591-595 Edgewood Avenue (32034) has been determined eligible for inclusion in the NRHP and presumably contributes to the NRHP Martin Luther King, Jr. Historic District (Boundary Increase). The former industrial building was constructed in 1929 (Mizell Rivers 1993g). The building is 1,690 feet (0.32 mile) from the proposed tower site. Its setting is not identified or implied as a character-defining feature and views of the proposed tower site from Edgewood Avenue are obscured by intervening buildings, infrastructure, and vegetation. The obscured view limits the potential effects resulting from the proposed tower.

Conclusions and Recommendations

Relative to the scale and nature of this proposed monopole's potential for impacts (a 70-foot-tall mast self-supporting structure), HDR's cultural resources experts have assessed the location's geomorphology, topographic setting, history, and the potential for direct and visual impacts. Due to the disturbed nature of the project area and the small area of ground disturbance required for the proposed project, there is little to no potential to impact intact archaeological resources. For built resources, the NRHP-eligible Georgia Railroad (GAR) corridor intersects the APE. The proposed tower's presence within an active railroad ROW would not diminish the rail corridor's setting or limit the ability of the NRHP-eligible corridor to convey its historic, architectural, and engineering significance. Additionally, seven NRHP-listed historic districts, two individually



NRHP-listed buildings, and seventeen NRHP-eligible buildings are located within the 0.5-mile visual APE. The proposed tower's presence would not diminish these resources or limit their ability to convey their historic significance. The project, therefore, will have no adverse effect on any previously recorded historic properties.

HDR recommends a finding of **No Adverse Effect** for this project and additionally recommends no further cultural resources work for the Hulsey Yard Tower project, as defined in this report.



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Appendix A: Project Maps



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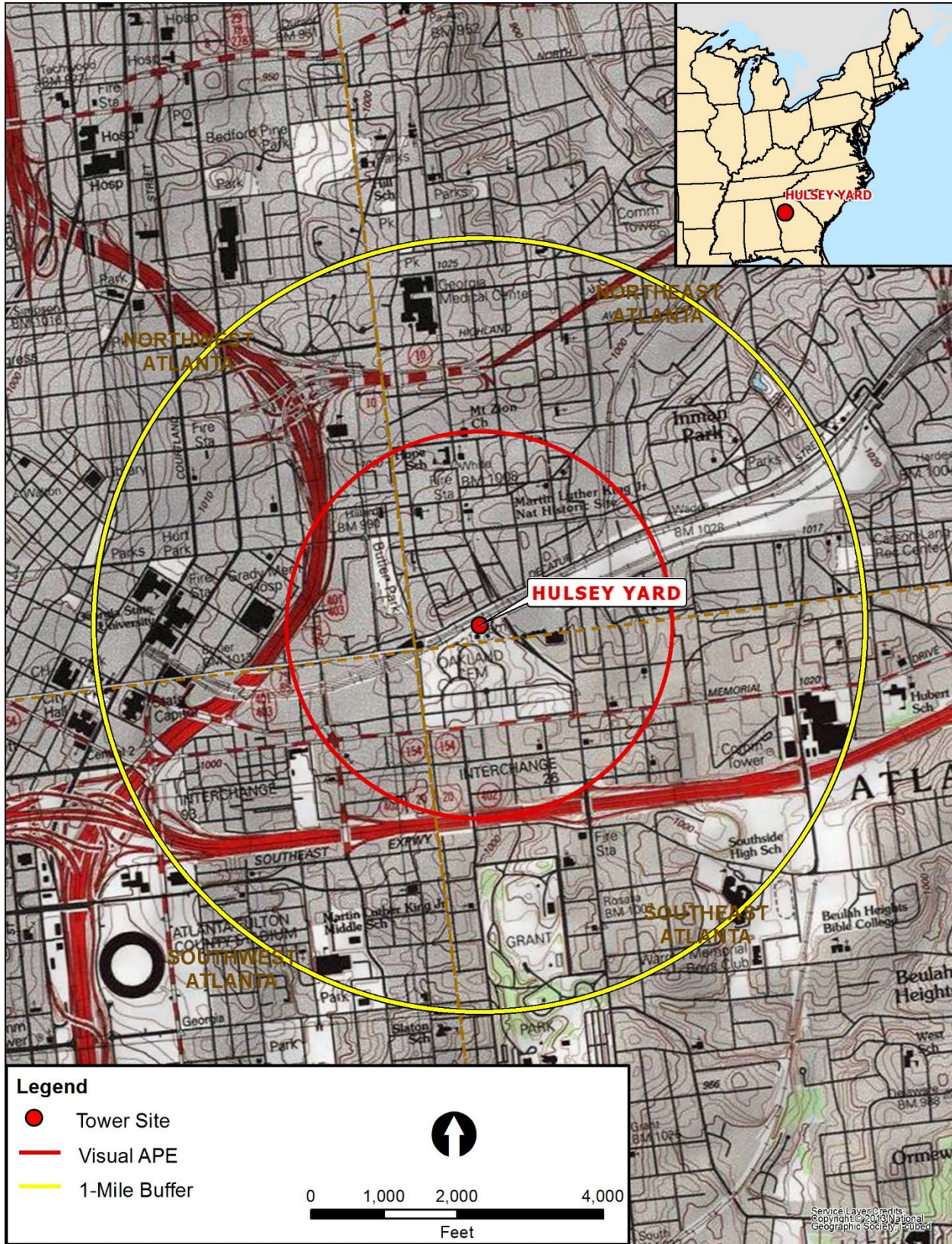


Figure 1. Topographical map depicting the proposed project location, visual APE, and 1-Mile Buffer.

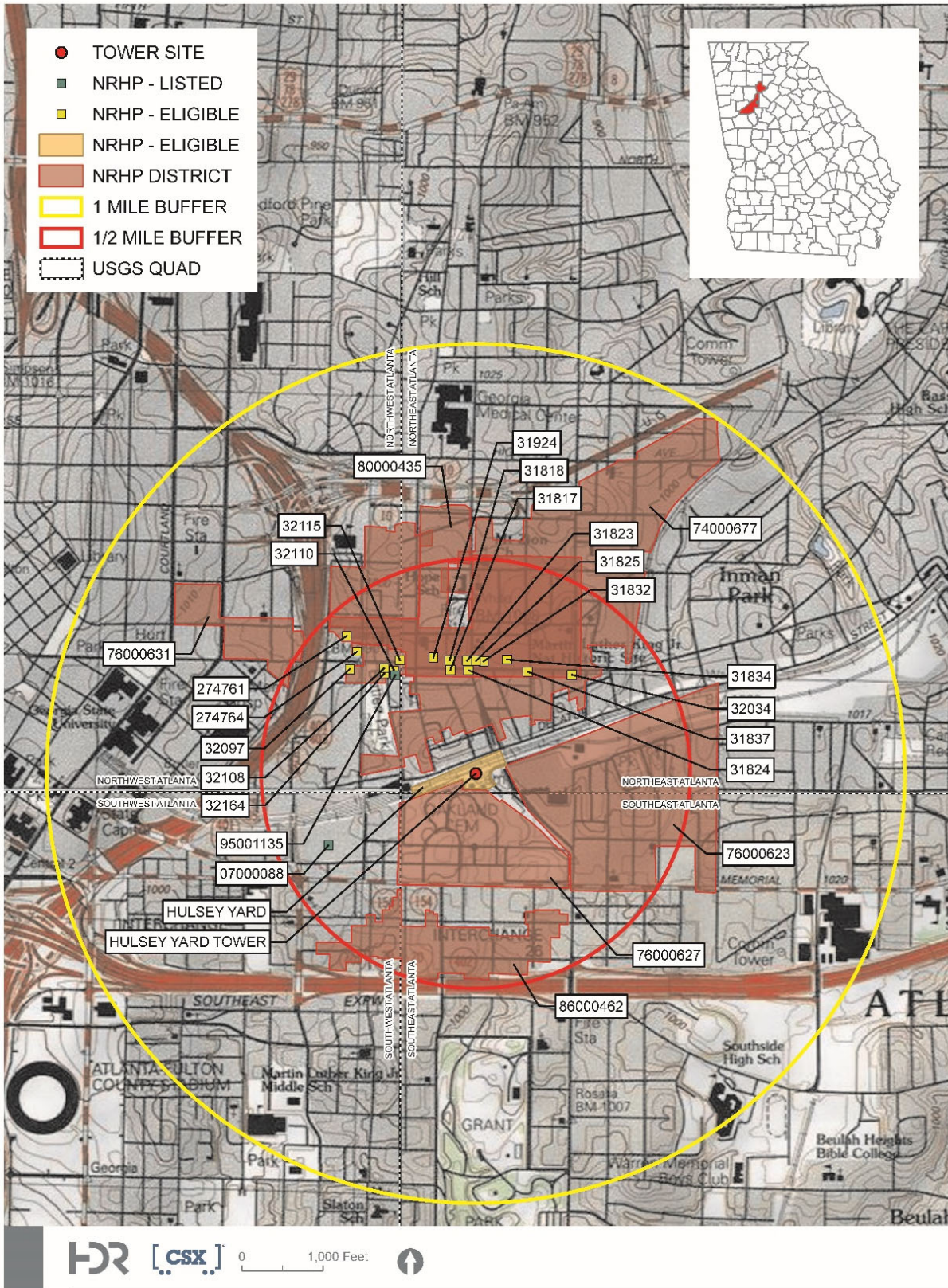


Figure 3. NRHP-listed and NRHP-eligible properties within 0.5 mile visual APE.

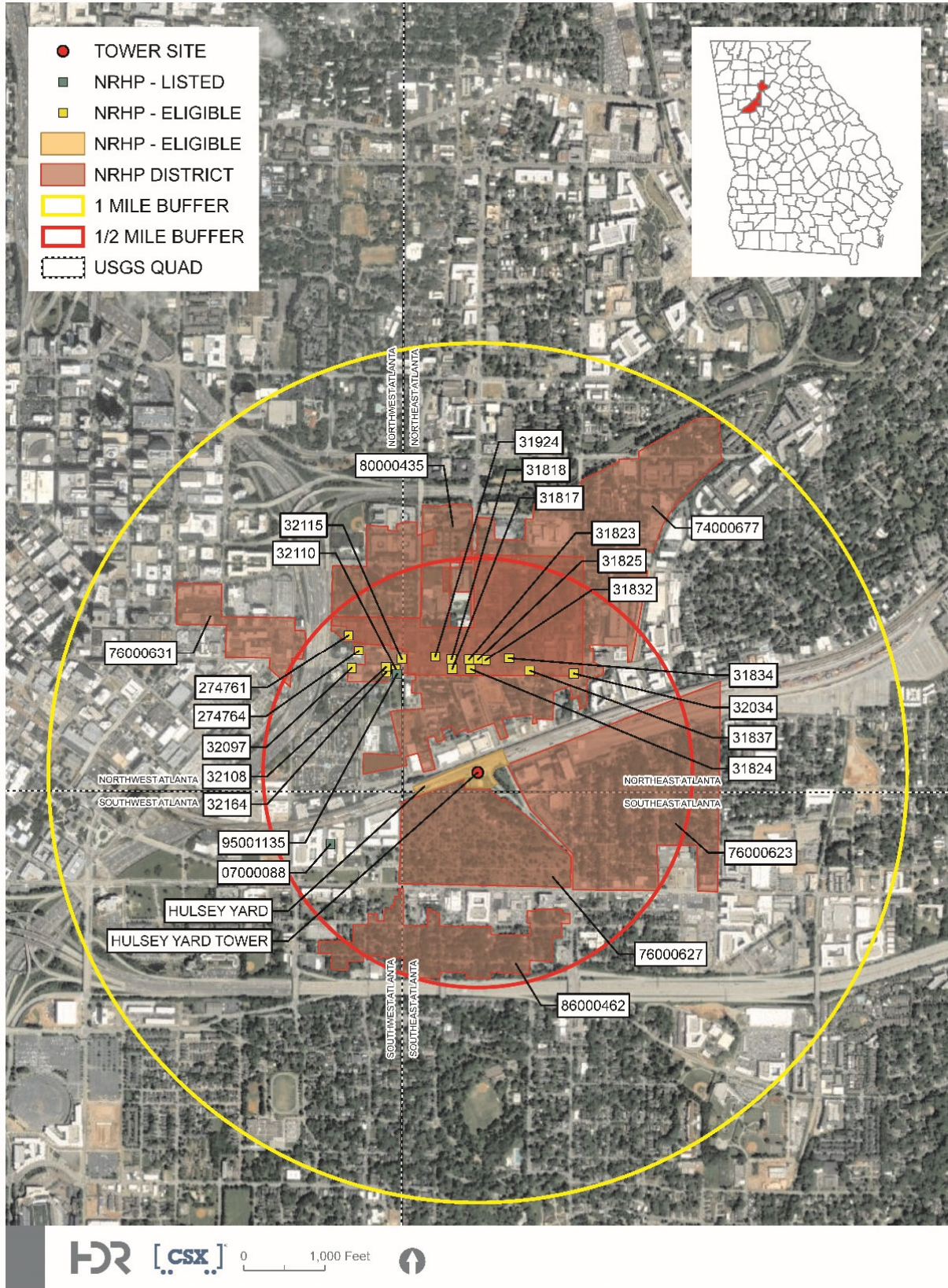


Figure 4. NRHP-listed and NRHP-eligible properties within 0.5-mile visual APE.



Appendix B: Project Location Photographs



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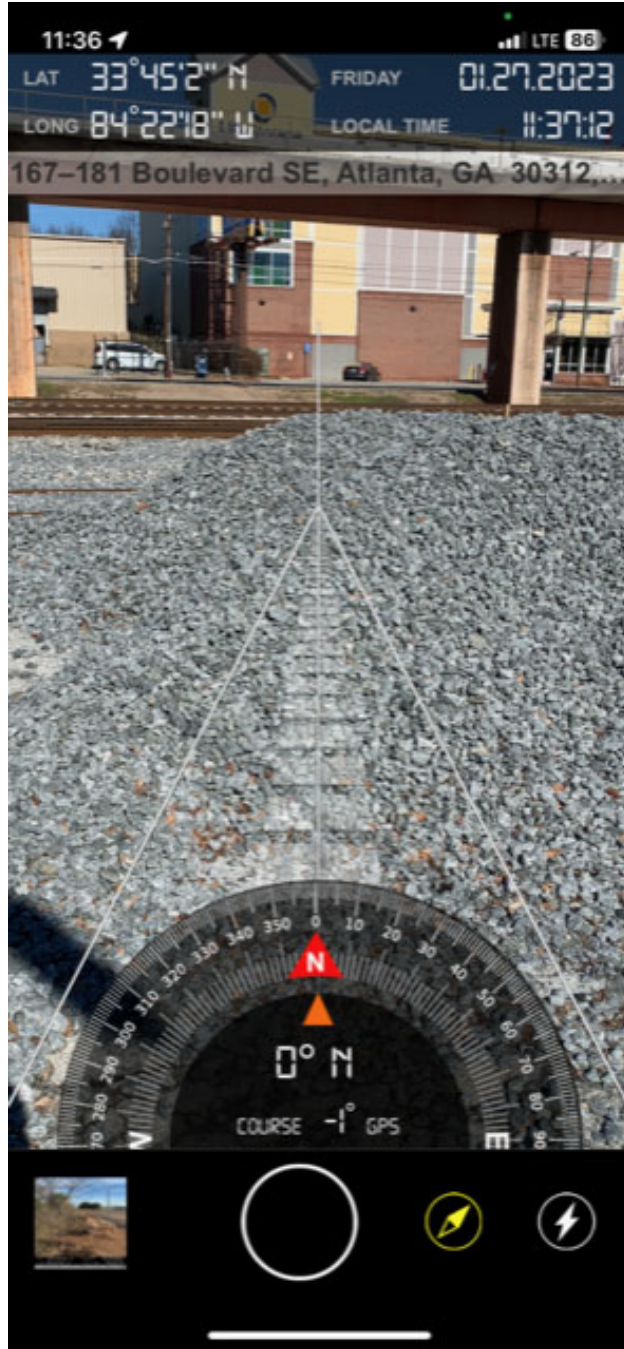


Figure 5. Location of the proposed Hulsey Yard RPTR Tower, view north.

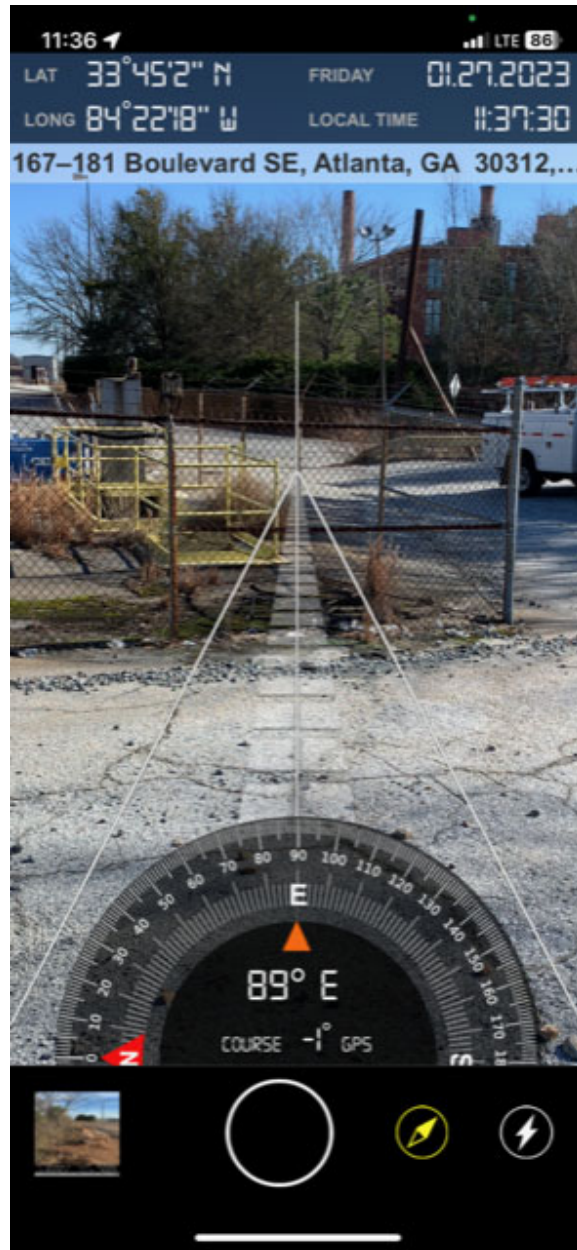


Figure 6. Location of the proposed Hulsey Yard RPTR Tower, view east.



Figure 7. Location of the proposed Hulsey Yard RPTR Tower, view south.

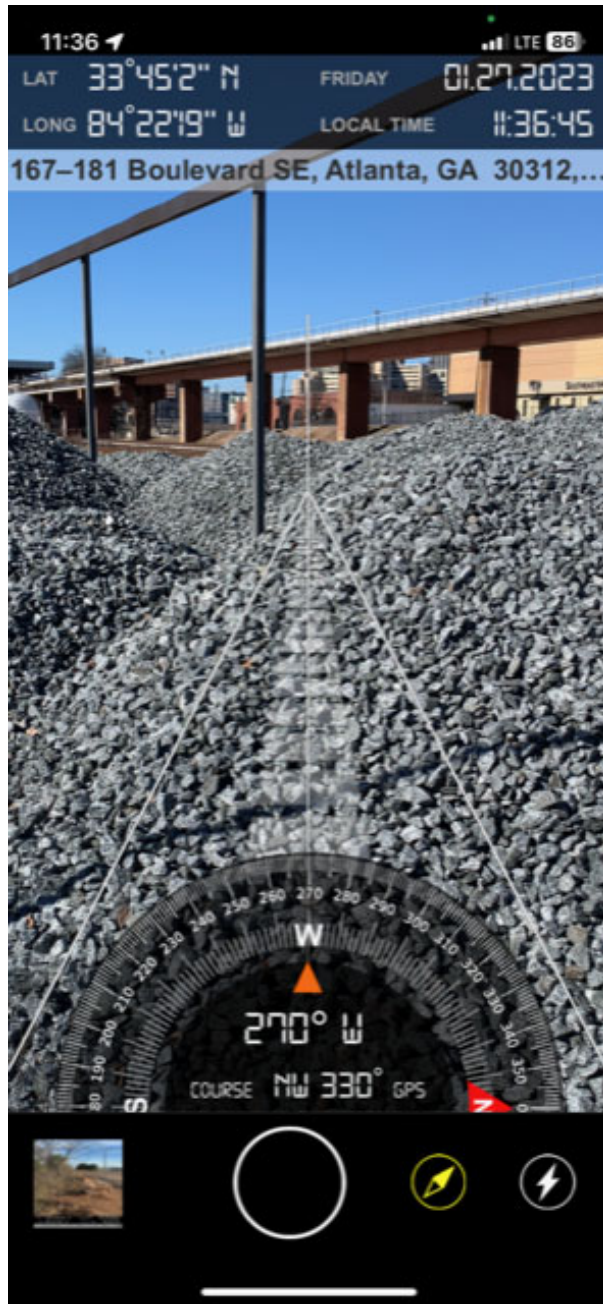


Figure 8. Location of the proposed Hulsey Yard RPTR Tower, view west.

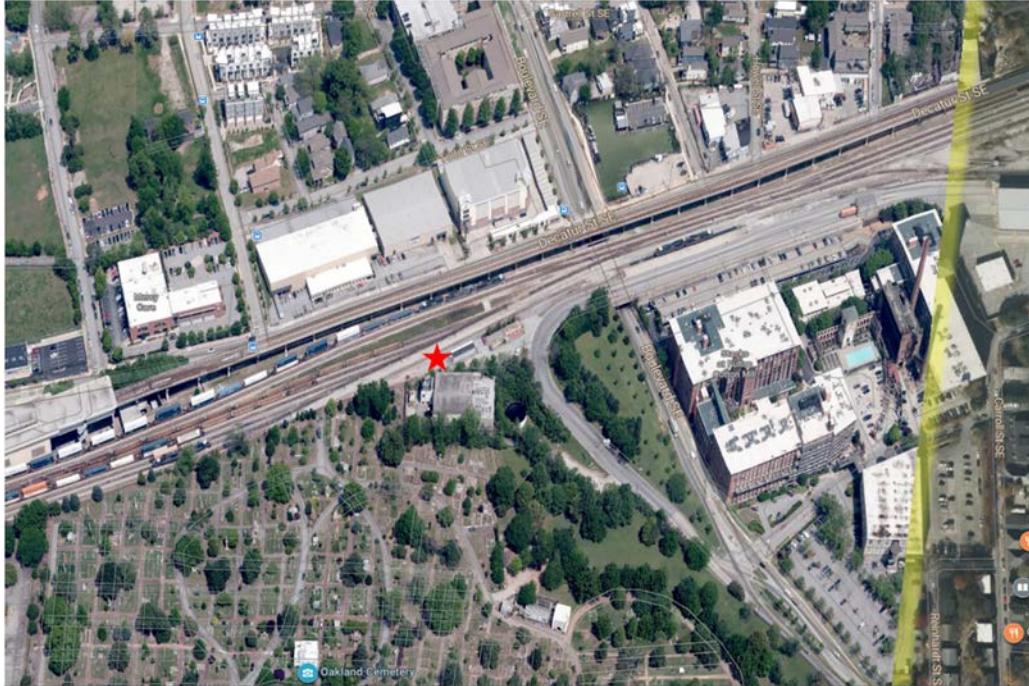


Figure 9. Aerial image showing location of the proposed Hulsey Yard Tower (red pin), view north (Bing 202).

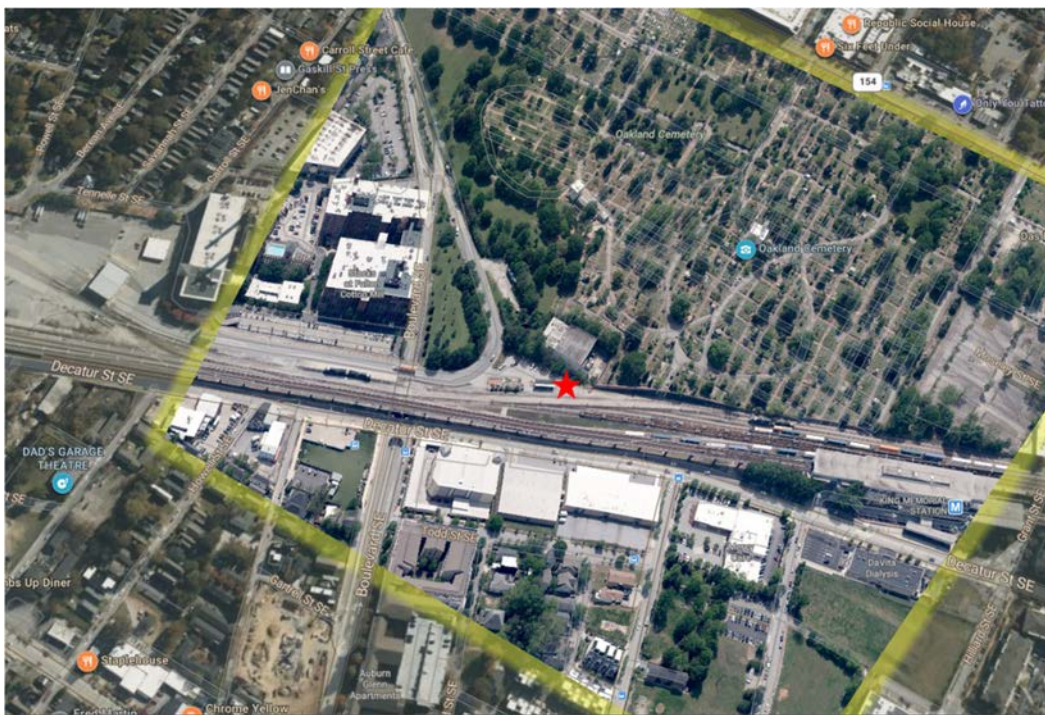


Figure 10. Aerial image showing location of the proposed Hulsey Yard Tower (red pin), view south (Bing 2023).



Figure 11. Image showing Oakland Cemetery internal relationships, view northeast towards proposed Hulsey Yard Tower (Google Street View 2012).



Figure 12: 1975 image showing proximity of CSX railyard to Oakland Cemetery; facing north (Lyon and Combs 1975).



Figure 13. 1975 image showing Oakland Cemetery internal relationships within view of adjacent NRHP Cabbagetown District smokestacks, view east (Lyon and Combs 1975).



Figure 14. Street View image from NRHP Cabbagetown District towards proposed Hulsey Yard Tower (Google Street View 2022).



Figure 15. Street View image from NRHP Martin Luther King, Jr. Historic District (Boundary Increase) from Todd Street towards proposed Hulsey Yard Tower (Google Street View 2022). Red arrow indicates existing cell tower southeast of proposed site.

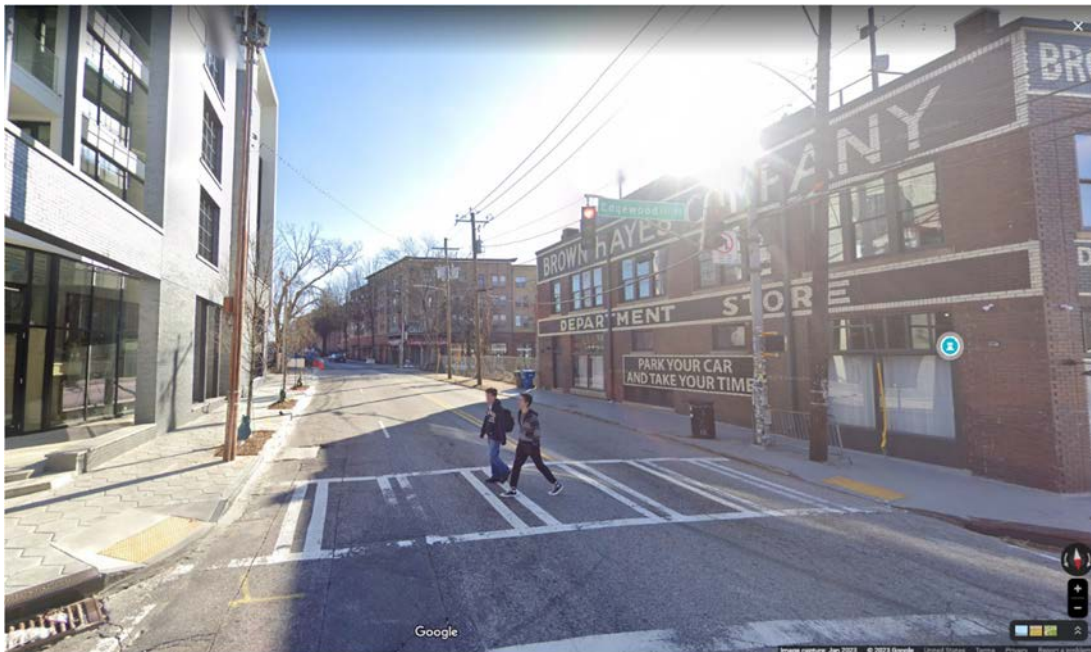


Figure 16. Street View image from NRHP Martin Luther King, Jr. National Historic Site and Preservation District at Edgewood Avenue towards proposed Hulsey Yard Tower (Google Street View 2023).



Figure 17. Street View image from NRHP Sweet Auburn Historic District at Edgewood Avenue towards proposed Hulsey Yard Tower (Google Street View 2023).



Figure 18. Street View image from NRHP Grant Park North District from Southeast Woodward Avenue towards proposed Hulsey Yard Tower (Google Street View 2022). Yellow arrow indicates location of proposed Hulsey Yard Tower, red arrow indicates NRHP Cabbagetown District smokestacks.



Figure 19. Street View image from NRHP J.K. Orr Shoe Company building at William Holmes Borders Senior Drive towards proposed Hulsey Yard Tower (Google Street View 2023).



Figure 20. Street View image from NRHP Southern Spring Bed Company building at Martin Luther King, Jr. Drive towards proposed Hulsey Yard Tower (Google Street View 2023).



Appendix C: Key Staff Resumes



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Marcus Huerta

Architectural Historian

Mr. Huerta brings 5 years of experience in historical studies with a particular emphasis on the built environment. He meets the Secretary of the Interior's Professional Qualification Standards for architectural history. His experience includes architectural and historic sites surveys, National Register of Historic Places (NRHP) eligibility evaluations and nominations, Historic American Buildings Survey (HABS) documentation, historic structure reports, conditions assessments, disaster recovery, and archival research. Mr. Huerta has experience on projects for the Texas and Oklahoma Departments of Transportation, Oklahoma Historical Society, the U.S. Army Corps of Engineers (USACE), the City of San Antonio, a range of municipal transit agencies, and other governmental and private entities. Mr. Huerta is a registered Federal Railroad Administration roadway worker.

EDUCATION

Master of Science, Architecture,
University of Texas-San Antonio,
2018

Bachelor of Arts, Organizational
Development, University of the
Incarnate Word, 2014

REGISTRATIONS

Federal Railroad Administrations
Roadway Worker Protection, U.S.
National Registration, No. 2394148
Issued: 9/9/2015, Expires: 8/24/2017

INDUSTRY TENURE

5 years

HDR TENURE

January 2023

OFFICE LOCATION

San Antonio, TX

PROFESSIONAL EXPERIENCE

Selected experience, prior to employment with HDR.

Historical Resources Studies: Cliffside Gas Field and Crude Helium Enrichment Unit (Vicinity of Amarillo, Texas), the Satanta Maintenance Station (Satanta, Kansas), and the Federal Helium Pipeline (Texas, Oklahoma, and Kansas) (2022). Project Historian for cultural resources study related to the United States Bureau of Land Management's disposal of certain properties associated with the United States Federal Helium Reserve in Texas, Oklahoma, and Kansas. As a result of the survey, one resource was recommended eligible for the NRHP. Mr. Huerta completed background and archival research, field survey, context development, resource assessment, and preparation of survey report.

VIA Advanced Rapid Transit North/South Corridor Project Non-Archeological Historic Resources Survey Report (2022). Project Historian for cultural resources study of VIA Metropolitan Transit's proposed north/south bus rapid transit line. A total of 389 historic-age resources were recorded, and four extraordinary non-historic age resources were recorded and evaluated for historic significance achieved within the past fifty years. As a result of the survey twenty resources were recommended individually eligible for the NRHP, five were recommended contributing to existing NRHP districts, and four were recommended contributing to potential districts. Mr. Huerta completed background research, field survey, resource assessment, and preparation of survey report.

Zarzamora from US 90 to Jennings Avenue (2022). Project Historian for City of San Antonio proposed roadway bridge on Zarzamora Street over the Union Pacific Railroad. A total of 96 historic-age resources were surveyed and a single property was recommended eligible for the NRHP. Mr. Huerta completed background research, field survey, resource assessment, and preparation of survey report.

Section 106 Evaluation for the Carnahan Canal and Curiosity Street Bridge, San Antonio, Bexar County, TX (2021)

Project historian for Section 106 eligibility and effects evaluation for the

Carnahan Canal (Witte Channel) and Curiosity Street bridge, structures built in the 1930s and 1940s. Project required a permit from the USACE, triggering compliance with Section 106 of the NHPA. Evaluated significance and integrity to make NRHP eligibility recommendation and applied criteria of adverse effects for the undertaking.

Reconnaissance Historic Resources Survey of US 190 from San Saba County Line to US 183, Lampasas County, TX (2021)

Reconnaissance survey of 99 resources and Section 106 evaluation for project proposing improvement to US 190 in western Lampasas County. Investigations resulted in the affirmation of one NRHP-listed property and recommendation of one property as eligible for the NRHP. Evaluated potential adverse effects to the properties recommended eligible. Assessed use under Section 4(f) and found no adverse effect and no Section 4(f) use of the sites. 2021.

Intensive Archival Research for Northern Brackenridge Park, San Antonio, Bexar County, TX (2021)

Project historian for a project to analyze a large volume of primary and secondary source material regarding certain features in Brackenridge Park. The City of San Antonio proposes improvements to an area of northern Brackenridge Park and wishes to understand the historical significance and integrity of several features of interest, including the 19th century Pump House #1, the Lily Pond, Upper Labor Acequia, Raceway, Raceway bridge, and Lambert Beach. Reviewed, cataloged, and analyzed archival material. A background report on the features of interest was produced, and an annotated database of sources.

Historic Resources Survey for Midtown Drainage Improvements, San Marcos, Hays County, TX (2021). Section 106 historic resources survey for a project proposing stormwater infrastructure improvements partially funded by HUD. Coordinated with the Texas Historical Commission to establish the area of potential effects and documented historic-age resources. As a result of the survey, the 1928 Union Pacific railroad bridge over the Blanco River and River Road, was recommended as eligible for listing in the NRHP. Mr. Huerta made a recommendation of no adverse effect under Section 106 and received THC concurrence.

Historic Resources Survey for US 90 from SH 211 to IH 410, San Antonio, Bexar County, TX (2020). Project Historian for cultural resources survey conducted of 56 historic-age resources. Completed background research, field survey, resource assessment, and preparation of survey report. The assessment included determination of form, style, materials, and changes to the surveyed resources; and National Register of Historic Places (NRHP) eligibility.

Cultural Resources Survey Report for Lake Ralph Hall, Fannin County, TX (2020). Project Historian for cultural resources survey conducted of 189 historic-age resources. Completed background research, field survey, resource assessment, and preparation of survey report. The assessment included determination of form, style, materials, and changes to the surveyed resources; and National Register of Historic Places (NRHP) eligibility. Also prepared the associated survey forms.

Captain Creek Bridge SH-66B Mitigation Documentation, Wellston, Lincoln County, OK (2020) Prepared HAER documentation for a NRHP



listed bridge over Captain Creek, in the vicinity of Wellston, Oklahoma. As a part of a MOA to improve fracture-critical aspects of the bridge, character defining features significant to the bridge's nomination would be lost. The documentation recorded the bridge's historic significance and included HAER Level II photography.

Thematic Survey of Route 66, Tulsa County, OK (2020) Project historian for a thematic survey of Route 66-related resources through Tulsa County. Mr. Huerta worked closely with the Oklahoma Historical Society, local preservation groups, and Route 66 experts. The survey report included a context for Route 66 and its development in Tulsa County, as well as recommendations for properties that have potential for NRHP designation. The project included 125 recorded properties and was completed in accordance with the Oklahoma Historical Society's requirements for architectural/ historic surveys.

Hurricane Harvey Disaster Recovery Homeowner Reimbursement Program, TX (2019-2020). Project Historian for identification of historic properties, evaluation of effects to historic properties, and coordination with Texas Historical Commission under Section 106 of the National Historic Preservation Act.

Historic Building Survey for North Loop, Hancock, and Upper Boggy Creek Neighborhoods, City of Austin, Travis County, TX (2019-2020). Survey of over 4,000 resources constructed prior to 1974 in the northeast half of North Central Austin. Project included field survey, historic context development, public outreach, oral history interviews, archival research, and development of recommendations regarding historic districts, individual landmarks and NRHP properties, and potential heritage tourist destinations. The contexts addressed major development, architecture, transportation, economic, and social trends in the history of the city and neighborhoods. A historic district summary was prepared for potential districts (eight total), which will serve as the foundation for neighborhood groups that wish to pursue formal designation.

Historic Structure Report, Route 66 "Ribbon Road," Ottawa County, OK (2019). Project Historian for a historic structure report of the 9-foot-wide former section of Route 66, known as the "Ribbon Road," in Ottawa County, Oklahoma. The report included developmental history, historical background and context, chronology of development and use, physical description, evaluation of significance, condition assessment, historic preservation objectives, requirements for work, and work recommendations and alternatives.

Memorandum Regarding Section 106 Evaluation of Parcels within Oklahoma City Northwest Bus Rapid Transit (BRT) Area of Potential Effect; Central Oklahoma Transportation and Parking Authority, Oklahoma County, OK (2019). Served as Project Historian for cultural resource survey conducted May 2019 of 10 historic-age resources dating from 1915 to 1974. Completed background research, field survey, resource assessment, and preparation of memorandum to the Oklahoma Historical Society. The assessment included determination of form, style, materials, and changes to the surveyed resources; and NRHP eligibility. As a result of

the survey, Mr. Huerta recommended one previously unrecorded resource eligible for inclusion in the NRHP.

Intensive Level Survey of Guthrie Historic District, Guthrie, Logan County, OK (2019). Project Historian for an intensive level architectural/historic resources survey of the National Historic Landmark Guthrie Historic District in Guthrie, Oklahoma. Resources on 132 parcels were evaluated, focusing on the 69 contributing and 42 noncontributing resources identified in the Guthrie Historic District NHL nomination. Each resource in the district was reevaluated for contributing or noncontributing status. Mr. Huerta also reevaluated the NHL district's areas of significance, period of significance, and boundaries. Completed background research, field survey, survey forms, and preparation of survey report.

Cultural Resources Survey Report for Proposed Improvements to SH-28 over Pensacola Dam for Oklahoma Department of Transportation (J/P 31884(05)), Mayes County, OK (2019). Project Historian for cultural resources survey of 95 historic-age resources dating from 1897 to c.1975. Completed background research, field survey, resource assessment, and preparation of survey report. The assessment included determination of form, style, materials, and changes to the surveyed resources; and National Register of Historic Places (NRHP) eligibility. The survey included re-evaluation of the NRHP-listed Pensacola Dam Historic District and the individually listed 1942 Disney Jail building. As a result of the survey, Mr. Huerta recommended two previously unrecorded resources eligible for inclusion in the NRHP.

Historic Resources Survey for FM 1518 from FM 78 to IH 10 for the TxDOT San Antonio District, Bexar County, TX (2018). Historic Resources Reconnaissance Survey for a project northeast of San Antonio proposed to widen FM 1518 from FM 78 to IH 10, for a length of approximately 5.5 miles. The project required developing a historic context and research design, field survey, and making recommendations regarding NRHP eligibility and effect. In all, 75 historic-age resources were documented, including 3 that were determined eligible for the National Register of Historic Places (WPA-built resources on Joint Base San Antonio – Randolph and two late nineteenth-century farmsteads). Project also included preparing documentation to support a de minimis finding under Section 4(f) for direct impacts at two of the eligible properties.

Historic Structure Report for the San Antonio Missions National Historical Park, San Antonio, Bexar County, TX (2018). Project Historian for preparation of developmental histories for the Mission San José and Mission Concepción conventos, including historical background and context. Also authored HSR chronology of development and use.



Amy Leuchtmann

Archaeology Project Director

Ms. Leuchtmann has ten years of experience working on professional archaeological projects, both terrestrial and underwater. She has experience working on cultural resource management projects in the North-Central United States, Central United States, the Midwest, Texas, as well as on the Gulf Coast. As a Maritime Archaeologist with HDR, she is responsible for maritime site assessment and consultation, and contributed subject matter expertise during the BP Deepwater Horizon oil spill cleanup.

Ms. Leuchtmann's experience includes conducting background research, Phase I and Phase II surveys. She also has maritime archaeology field experience in both salt and freshwater environments. Ms. Leuchtmann has written or contributed to numerous technical reports submitted to local, state, and federal government entities.

EDUCATION

M.A., Maritime Archaeology, East Carolina University, 2011

B.A., Liberal Arts/Sciences (Liberal Arts & Sciences- Concentration: Biology), Florida Atlantic University, 2004

PROFESSIONAL AFFILIATIONS

Society for Historical Archaeology, 2005-Present

INDUSTRY TENURE

10 years

HDR TENURE

7.5 years

OFFICE LOCATION

Dallas, Texas

RELEVANT EXPERIENCE

BNSF, Positive Train Control Tower Compliance AL, AR, AZ, CA, CO, IA, ID, IL, KS, LA, MN, MO, MS, MT, ND, NE, NM, OK, OR, SD, TX, TN, WA, and WI, 08/2013–Present. Archaeology Project Director. Working with Native American tribes and SHPOs to identify historic properties and areas of Indian heritage that may be affected by tower construction. Workflow involves gathering and processing of background information, GIS data, state archaeological and historic site data, and preparation of cultural resource memos and reports compliant with the FCC's Program Comment to be provided to Indian tribes and other interested parties on short notice. Also responsible for distributing data packages to SHPOs, participating tribes, and local government contacts. Complete and submit FCC 620 forms for towers. Maintain clear records for tower tracking purposes.

CSX Transportation, CSX Positive Train Control Tower Compliance AL, DC, DE, FL, GA, IL, IN, KY, LA, MA, MD, MI, MS, NC, NJ, NY, OH, PA, SC, TN, VA, and WV, 08/2013–Present. Archaeology Project Director. Working with Native American tribes and the various SHPOs to identify historic properties and areas of Indian heritage that may be affected by tower construction. Workflow involves gathering and processing of background information, GIS data, state archaeological and historic site data, and preparation of cultural resource memos and reports provided to Indian tribes and other interested parties on short notice. Complete and submit FCC 620 forms for towers. Also responsible for distributing data packages to SHPOs, participating tribes, and local government contacts. Maintain clear records for tower tracking purposes.

Ash Grove Cement Company, Ash Grove, Chantue, KS, 11/2018-12/2018. Archaeologist Field Director. Ash Grove Cement Company proposed an expansion of their existing limestone mining efforts. Ms. Leuchtmann led the field crew which performed a Phase I cultural resource survey, including pedestrian survey and shovel testing. She was also



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responsible for authoring the technical report for the client and submission to KS SHPO.

Port of Brownsville, USACE Easement Transfer, Brownsville, TX, 11/15/2018-11/16-2018. Archaeologist. The USACE was scheduled to release easements within the Port of Brownsville to the Port. Ms. Leuchtmann conducted a site visit to summarize the cultural resources within the easement.

GBRA, Carrizo Groundwater Supply Project, TX, 09/2018-10/2018. Archaeologist. GBRA proposed improvements to within the groundwater supply of Caldwell and Gonzales counties. Ms. Leuchtmann was part of the cultural resource crew that completed a Phase I survey of approximately 1,080 acres which included pedestrian survey and shovel testing.

TXDOT, I-35 Denton, TX, 04/2018-05/2018. Archaeologist. TXDOT proposes to widen and reconstruct Interstate Highway 35 from four to six lanes for a total distance of approximately 15 miles. Ms. Leuchtmann performed a Phase I cultural resource survey including pedestrian survey and shovel testing.

Union Pacific Railroad, Brazos Yard Monitoring, TX. 03/2018. Archaeologist. UPRR is constructing a new rail yard in Robertson County. Part of the construction includes a large canal, draining into the Brazos River. Ms. Leuchtmann acted as a monitor during the construction of the canal.

NextEra Energy Resources, Crowned Ridge Wind Farm Project, SD. 08/2017-11/2017. Archaeologist. NextEra proposes to construct a 600 MW wind farm in Codington, Deuel, and Grant counties, South Dakota. Ms. Leuchtmann worked with representatives from the Sisseton-Wahpeton-Oyate, Spirit Lake, and Yankton tribes in the field, and helps provide coordination between the tribal representatives, the client, and their archaeological contractor in order to facilitate a joint archaeological-TCP field survey for the project.

Phase I Archaeological Survey for the NICTD West Lake Corridor Project, Lake County, Indiana. 04/17-05/17. Crew Chief. Ms. Leuchtmann conducted background research, led the field survey, acted as lead author of the survey report.

Archaeological Survey for the Selfridge Air National Guard (ANG) Station, Harrison Township, Michigan. 2/2017. Ms. Leuchtmann conducted the background investigation. Was part of the field survey team at the ANG installation, which included pedestrian survey and shovel testing.

Archaeological Survey for the Georgia Air National Guard (ANG) Savannah IAP and Glymco Air National Guard Station, Savannah, Georgia. 12/2016. Ms. Leuchtmann conducted the field survey at the ANG installations, which included pedestrian survey and shovel testing.

Phase II Archaeological Survey at Log Cabin Site, Minnesota Power, Great Northern Transmission Line, Northern Minnesota, 03/2016. Archaeologist. Ms. Leuchtmann performed a Phase II at a newly recorded historical site. The survey included shovel testing, excavation of test units, and survey with a metal detector.



BKI, Highway LA3132 Extension Project, Shreveport, LA, October, 2016. Crew Chief. Ms. Leuchtmann performed a cultural resources inventory covering approximately 10 miles of a 150-ft corridor for the proposed construction of an expansion for Highway LA3132 south of Shreveport, LA.

Minnesota Power, Great Northern Transmission Line, Northern Minnesota, 07/2016-09/2016. Archaeologist. Ms. Leuchtmann performed a cultural resources survey for Minnesota Power's proposed construction of a 224-mile 500k high-voltage transmission line originating in Manitoba, Canada. The survey included shovel testing at 15m intervals in areas of high and mid-level probability.

Ameren Transmission Company of Illinois, Spoon River Transmission Line Project, Galesburg to Peoria, IL, 05/2016-11/2016. Archaeologist. Performed a cultural resources inventory of the 45-mile Project ROW, which includes a 150-ft corridor, as well as access roads and staging areas. Shovel testing was done in areas of high probability. The survey recorded 27 new archaeological resources.

CDM Smith, Port Bienville, Port Bienville, LA, April 2016. Archaeologist. Performed a cultural resources inventory for the proposed construction of a main line of track leading into Port Bienville, LA.

Dickinson Bypass, ND, NDDOT, June 2015. Project Director. Conducted a file search at the ND SHPO and a Phase I cultural resources inventory of a 2.74-acre study area as an addendum to a previous inventory of a 4,462-acre study done in 2012.

Canadian Pacific Railway, Brownsville Siding, MN, May 2015. Archaeologist. Performed Phase I cultural resources inventory and Phase II archaeological evaluation on Canadian Pacific Railway's proposed new 11,000-foot long siding infrastructure which runs through south eastern Minnesota along the Mississippi River south of the city of La Crescent, in Houston, Minnesota. Phase I survey identified five archaeological sites and one historic property, the RR line itself. Phase II studies were completed for the RR line and for two of the five archaeological sites. One site was determined eligible for the National Register of Historic Places and would be adversely affected by the project.

BNSF, Pleasant Dale to Milford Ravenna Subdivision Capacity Expansion, Pleasant Dale and Milford, NE, April 2015. Archaeologist. Performed a cultural resources inventory of approximately 35 acres for BNSF's proposed construction of a second main line of track between Pleasant Dale and Milford, Nebraska. The survey recorded one archaeological resource and eleven aboveground resources, seven of which were recommended as NRHP eligible as an historic district.

BP Exploration & Production, Inc. and NOAA, Natural Resources Damage Assessment (NRDA) Cultural Resources Assessment, LA, MS, AL, FL, 09/2012-02/2014. Maritime Archaeologist. Conducted archaeological monitoring of biota and submerged oil sampling throughout the area affected by the Deepwater Horizon oil spill. Provided treatment recommendations to SHPO and federal trustee representatives throughout the four states for NHPA Section 106 compliance. \$282,809.

BP Exploration & Production, Inc., MC 252 Response Cultural Resources Assessment Program, LA, MS, AL, FL, 06/2011-06/2014.

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Maritime Archaeologist for the HDR team that provided cultural resources support for the Deepwater Horizon oil spill cleanup. Responsible for the archaeological monitoring of operations associated with the cleanup process. Conducts site assessments for maritime related sites on land (shipwrecks and isolated finds such as anchors or piers). Prepares reports detailing results of work conducted for the Section 106 process. \$10,000,000.

London State Fish Hatchery, Ohio Department of Natural Resources, Phase I Archaeological Survey for the London State Fish Hatchery Capital Project, Union Township, Madison County, Ohio, Madison County, OH, 12/2014. Crew Chief. Led crew during a Phase I archaeological survey in advance of electric line replacement at London State Fish Hatchery. Conducted pedestrian and subsurface testing while using iPad field recording techniques for data collection.

NPS, Photogrammetry Project on the USS Arizona, Pearl Harbor HI, 11/2014. Maritime Archaeologist. Acted as on-site maritime archaeologist during experimental testing of new photogrammetry software in a challenging underwater environment.

Eastern Gulf Crude Access, Phase I Archaeological Survey for the Patoka to Trunkline Pipeline Project, Marion, Wayne, and Clay Counties, IL, 07/2014. Crew Chief. Led crews for a Phase I Archaeological survey in advance of pipeline in southern Illinois. Conducted pedestrian and subsurface testing while using iPad field recording data collection and maintenance.

BP Exploration & Production, Inc., Cat Island Archaeological Investigation, MS, Feb-May 2012. Assisted in a Phase I survey of Cat Island, Mississippi. Excavated shovel tests along the island's shoreline and delineated both previously and newly recorded sites.

NON-HDR EXPERIENCE

FEMA, DR-1955-UT, St. George, UT, 03/2011-04/2011. Historic Preservation Specialist. Acts as FEMA liaison for local SHPOs and THPOs. Oversee compliance of FEMA funded projects with the NHPA and Section 106. Act as leader for cultural resource survey and testing projects conducted by FEMA. Review reports submitted by hired consultants detailing the results of work conducted for the Section 106 process.

FEMA, DR-1907-ND, Bismarck, ND, 08/2010-12/2010. Historic Preservation Specialist. Acts as FEMA liaison for local SHPOs and THPOs. Oversee compliance of FEMA funded projects with the NHPA and Section 106. Act as leader for cultural resource survey and testing projects conducted by FEMA. Review reports submitted by hired consultants detailing the results of work conducted for the Section 106 process.

Kadmas, Lee & Jackson, Inc., Miscellaneous Projects, Bismarck, ND, 08/2008-08/2010. Crew Chief. Acted as leader for cultural resource survey and testing project field crews for oil and natural gas pipelines, oil well pads, access roads, wind farms, DOT projects, and community improvement projects. Provided recommendations to clients and lead agencies on cultural resource eligibility. Prepared, reviewed, and submitted reports to clients and lead agencies detailing the results of work conducted for the Section 106 process. Created maps for fieldwork and final reports using ArcGIS software.



Vasa Beakhead Recording Project/Archaeological field school run by East Carolina University, 2007. Student Archaeologist. Responsibilities included recording the structural elements of the beakhead are of the Swedish warship Vasa, both manually and digitally. Create a digital model of beakhead using software Rhino.

Ivanhoe Underwater Recording Project/Archaeological field school run by East Carolina University, 2007. Student Archaeologist. Responsibilities included mapping a 160-foot iron-hulled vessel using triangulation method. Created shoreline map using total station equipment.

Washington Park Vessel Underwater Recording Project/Archaeological field school run by East Carolina University, 2006. Student Archaeologist. Responsibilities included mapping a 60-foot wooden schooner using both baseline offset method and Site Recorder software. Created shoreline map using total station equipment.

Roanoke and Perquimans River – Phase I survey/East Carolina University, 2006. Student Archaeologist. Used sonar and magnetometer to survey the Roanoke and Perquimans Rivers. Received training on Hypack and SonarWiz software.

Continental Underwater Recording Project/Archaeological field school run by East Carolina University, 2007. Student Archaeologist. Responsibilities included mapping a 250-foot wooden bulk carrier using baseline offset method. Created shoreline map using total station equipment.

Master's Thesis

2011 *The Central Places of Albemarle Sound: Examining Transitional Maritime Economies through Archaeological Site Distribution*, Unpublished M.A. Thesis. Department of History, East Carolina University, Greenville, NC.

Professional Reports

- 2010 *Fort Berthold Rural Water - New Town 1 Pipeline: A Class III Cultural Resource Inventory in Mountrail County, North Dakota.* Manuscript on file at the State Historical Society of North Dakota, Bismarck.
- 2010 *Watford City Fiber Optic Cable: A Class III Cultural Resource Inventory, McKenzie County, North Dakota.* Manuscript on file at the State Historical Society of North Dakota, Bismarck.
- 2010 *City of Mandan Cell Tower: A Class III Cultural Resource Inventory, Morton County, North Dakota.* Manuscript on file at the State Historical Society of North Dakota, Bismarck.
- 2009 *Highway 1804 HES-1-804(039)61: PCN 18023: A Class III Cultural Resource Inventory, Burleigh County, North Dakota.* Manuscript on file at the State Historical Society of North Dakota, Bismarck.
- 2009 *Fort Berthold Reservation Waterline: A Class III Cultural Resource Inventory, Dunn County, North Dakota.* Manuscript on file at the State Historical Society of North Dakota, Bismarck.
- 2008 *Two Shield Butte 2-28H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.*



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- Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Tall Bear 4-85H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Skunk Creek 14-3-13H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Baker 44-25H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Charging Eagle 2-22H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Charging Eagle 13-22H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Charging Eagle 15-14H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Jay Sandstrom 34-31H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Two Shields Butte 14-33H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Two Shields Butte 16-8H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Two Shields Butte 16-12H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.
- 2008 *Walker 11-36H Well Pad and Access Road: A Class III Cultural Resource Inventory, Mountrail County, North Dakota.* Manuscript on file at State Historical Society of North Dakota, Bismarck.

Professional Presentations



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- 2009 The Vasa Beakhead Recording Project. Paper presented at the Society for Historical Archaeology Annual Conference, Toronto, ON.
- 2008 Perquimans River Survey. Paper presented at the Perquimans County Restoration Association Annual Meeting, Hertford, NC.
- 2007 Students Teaching Students: East Carolina University's Maritime Studies Association Outreach Program. Paper presented at the California Maritime Education Conference, San Francisco, CA and the Maritime Heritage Conference, San Diego, CA.
- 2007 Perquimans River Survey. Paper presented at the North Carolina Maritime History Conference, Edenton, NC.



Appendix D: FCC Form 620



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