SECTION 106 PROJECT REVIEW MEMORANDUM

To: Rob Sikora, FHWA
Date: August 12, 2019
Subject: NO ADVERSE EFFECT
Project Name: Georgia (Bridge Replacement)
Project Number: BF 023-1(7)
Location: VT RT 104A, approximately 1.1 miles east of US 7, Georgia, Franklin County, VT
Distribution: Laura Trieschmann, State Historic Preservation Officer
                Jeff Ramsey, VTrans Environmental Specialist Supervisor
                Rob Young, VTrans Project Manager

The Vermont Agency of Transportation (VTrans) is receiving funding for the above-referenced project from the Federal Highway Administration’s (FHWA) Federal-Aid Highway Program in Vermont. To assist FHWA with its responsibilities under Section 106 of the National Historic Preservation Act, VTrans’ 36-CFR qualified staff have reviewed the project and have made the following recommendations based on their findings. Project review consists of identifying historic and archaeological resources within the project's Area of Potential Effect and the project’s potential impacts to historic buildings, structures, historic districts, historic landscapes, and settings, and known or potential archeological resources. The information provided herein substantiates VTrans’ findings and recommended determination of No Historic Properties Affected for this project.

Project Description:
Work to be performed under Georgia BF 023-1(7) consists of replacement of the existing Bridge No. 1 and damaged guardrail with a new bridge, new guardrail and related roadway work. Bridge No. 1 is a 74-foot long, single span, rolled steel beam bridge with concrete abutments and a concrete cast-in-place deck constructed in 1937. Bridge No. 1 carries VT Rt. 104A over a stem of Arrowhead Mountain Lake, close to the confluence of the Lamoille River, which lies southwest to the project.
In defining the project Area of Potential Effect (APE) and determining appropriate identification efforts, VTrans considered the potential direct, indirect, and cumulative effects of the project, including the possible effects to known or potential historic and/or archaeologically sensitive properties and their aspects of integrity both within and beyond the project limits based on the scope, scale, nature, setting, topography, and other environmental factors associated with the project, such as views from and towards the project area and the potential for long-term effects.

The APE for direct effects includes the project limits for direct impacts. The direct impacts for this bridge replacement project consist of roadway approach work beginning at station 58+50 and extend eastward to station 65+00. Impacts also extend both north and south along the roadway slopes of VT 104A but are confined to the roadway slopes and bridge abutments. The APE for direct effects is indicated by the red line on the plan sheets below.

Due to the nature of the project and proximity of buildings to the project APE for direct effects, there is potential for additional, reasonably foreseeable impacts to historic resources associated with this project. Consequently, VTrans has determined that an APE for indirect effects extends to existing properties that are adjacent to the APE for direct effects. VTrans has limited the APE for indirect effects to adjacent properties only as the surrounding area is rural and there is only one property within visual range, thus there is minimal potential for the proposed project to affect distant properties. The APE for indirect effects is indicated by the area shown in transparent yellow on the plan sheets below.

VT RT 104A will be closed during construction and all activities will take place within the project limits shown on the accompanying Preliminary Plans dated 4-2-2019.

**Above-Ground Historic Resources**

VTrans Historic Preservation Staff conducted background and desk review to assess the historic sensitivity of the project by consulting VTrans records and the Vermont Division for Historic Preservation Online Resource Center (ORC). To identify potential historic significance in the project APE, the VTrans Historic Preservation Officer consulted the National and State Registers, Historic Surveys, Historic Maps, and the draft *Metal Truss, Masonry and Concrete Bridges of Vermont 1820-1978*.

VTrans identified two structures and/or buildings within the preliminary Area of Potential Effect:

1. **Bridge No. 1:**
   - VTrans reviewed the Registration Requirements listed in the *Metal Truss, Masonry and Concrete Bridges of Vermont, 1820 – 1978* and determined that Bridge No. 1 does not meet the requirements listed therein to be considered historic. VTrans therefore determined that Bridge No. 1 in Georgia is not eligible for listing on the National Register of Historic Places under Criteria for Evaluation A or C. Specifically, Bridge No. 1 is not eligible under Criterion A as it is not the first crossing at this location; it did not establish a new transportation corridor nor was it the direct cause of significant development or changes in land use; it was not built as part of a major state highway project or bridge building initiative; and it does not possess special characteristics, associations, or integrity...
that distinguishes it as an exceptional representative of a type. Bridge No. 1 is not eligible under Criterion C as it is not an early example of a Simple Span Concrete Bridge, a rare survivor of a type of bridge, an exceptional example of work, an innovative design, considered to be exceptional length, nor considered aesthetically important.

2. The Kemp-Sheppard House- A two-story, residential, brick building and farm built in 1830, with property dating back to the 1790s, making the home one of the earliest settlements in Georgia. Levi N. Kemp, a well-known brick mason, built his home in the Greek Revival style, which includes “gable front form, prominent side-hall entrance with surrounding pilasters and a large inted, shallow overhangs, cornice returns, and a gable peak window in the ell”. A decorative brick diamond is centered in the gable. The 1 x 4 bay, two-story back wing contains more modern additions such as wooden clapboards and trim, a high watertable, and boxed-in cornices, added during the mid-1980s.

The Kemp-Sheppard House is approximately 50 meters from the project location. The Kemp-Sheppard House is architecturally significant for its influence on later homes that were also built in the Greek Revival style cross Franklin and Lamoille counties, dating back to the 1830s and throughout the nineteenth century. The property remains a significant historic resource that was originally listed on the National Register of Historic Places in 1997. As noted in the National Register, “Despite changes…the property retains a high degree of integrity and remains as a rare surviving example of its type and period. It serves as a visual reminder of Levi N. Kemp’s work as a master craftsman and builder, and as an excellent example of Vermont’s vernacular farmhouse architecture.”

Last, this project is in the southeast section of Georgia, placing it outside boundaries of the Georgia Historic District. There are no buildings in three of the four bridge quadrants as the only developed property lies to the northeast of the bridge.

Archaeological Resources:
VTrans Archaeology Staff performed a desk review and background research using the Environmental Predictive Model, ArcMap and Google Earth data as well as information from the ORC on known sites. Archaeology staff also conducted a field visit that occurred during the summer of 2018 to further assess the area. The project area is located near the confluence of the Lamoille River and Arrowhead Mountain Lake. The bridge spans an outlet of the lake and a significant wetland area fed by multiple streams. The immediate areas north and south of the bridge are surrounded by wetlands. Areas further to the west and east consist mostly of alluvium deposits.

Several known archaeological sites have been previously identified in the general area including VT-FR-27 which UVM identified in 1978 and exists just west of the project location on a low terrace adjacent to the wetland. A parking lot has been constructed within this area and there are paths leading from the parking area through the woods to the edge of the lake/wetland. It is presumed that that areas to the east and north of this lot remain archaeologically sensitive where previous disturbance has not occurred. The area to the southwest consists of very shallow,
compact soils with numerous large root structures and densely populated conifers. The northeast quadrant consists of a small yard area surrounding an historic property that appears on the Wallings and Beers maps (1850 and 1872 respectively). West of the house, the land slopes steeply to the west into the wetland. The southeast quadrant consists primarily of very low wetland soils adjacent to the bridge and extending eastward past the end of the existing guardrail. The landform then rises about 3 feet and consists of alluvium soils in the vicinity of the existing utility pole. This area is relatively small but undisturbed other than the area of the pole. Drainage ditches exist within three of the four quadrants adjacent to the roadway. Please see attached map illustrating areas of archaeological sensitivity. Numerous sites are scattered around the edge of the lake and further to the east along the Lamoille River.

Public Consultation:
This project has been the subject of a warned public meeting explaining the project and seeking public comment, which was favorable to the proposed design. A Public Information Meeting was held on January 28, 2019.

Analysis:
Above-Ground Historic Resources: As Bridge No. 1 is not considered historic, removing it and constructing a new bridge in its place is not considered an adverse effect. However, because of the proximity of the Kemp-Sheppard property to Bridge No. 1, VTrans worked to ensure the property would not be impacted during construction or by the design of the new bridge. Safety design guidelines would have required an extensive run of guardrail in front of the entire Kemp-Sheppard property, but after reviewing the safety requirements and the project area features, VTrans determined it would be possible to greatly reduce the length of guardrail and minimize any visual impacts its installation would have on the historic property. While there will be a length of w-beam guardrail in front of the historic property towards the west, it is located between the road and the property’s fence and is in front of heavy brush so does not diminish the view of the historic property from the travelling public. VTrans Historic Preservation Officer determined that neither removal of Bridge No. 1 nor installation of guardrail Kemp-Sheppard property will adversely affect historic resources.

Archaeology: Although the area is considered to have very high archaeological sensitivity, the limits for this project are restricted to the existing roadway and slopes and immediate areas around the bridge as noted by the cut limits in the plans. Additionally, the road will be closed during the replacement so there is no need for a temporary bridge. These restrictions are in place to avoid impacts to archaeological areas and significantly reduce impacts to the wetlands and existing waterways. The project as currently designed avoids the archaeologically sensitive areas and therefore will have no effect on archaeological resources.

Based on the above analysis for above-ground historic and archaeological resources, VTrans concluded that the overall determination of effect for this bridge replacement project is No Adverse Effect.

If project plans change to include new activities outside the previously reviewed APE or if the project changes significantly to increase or relocate the APE, VTrans project managers will re-submit the project for further cultural resource evaluation.

Stipulations:
1. Protective fencing will be placed along project limits in the areas indicated by red lines on figures 5 and 6 of this letter to protect arch sensitive areas during construction.

**Vermont Agency of Transportation:**
The above information substantiates VTrans’ findings and recommended determination of NO ADVERSE EFFECT for the above project.

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[Signatures]

Archaeology  
Historic Preservation

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**Attachments:**

- [ ] Survey Form(s)
- [x] Photos
- [x] Map
- [x] Report(s)
- [x] Plan Set Date: 4-2-2019
- [ ] Other:
Project location map

Project location and detailed view of surrounding area and project proximity to Georgia and Milton border.
ArcMap showing project location
Plan sheet 1 of 2 illustrating the project APE’s. Plan sheet 1 above shows the western side of the project. The APE for direct effects is indicated by the red line on the plan sheet above.
Plan sheet 2 of 2 illustrating the project APE’s. Plan sheet 2 above shows the eastern side of the project. The APE for direct effects is indicated by the red line on the plan sheet above while the APE for indirect effects is indicated by the area shown in transparent yellow.
ArcMap showing arch sensitive areas. Known site location in vicinity of existing parking area in NW quad.

Google Earth Aerial Image. Kemp-Sheppard property is shown at the right.
Red line indicates area of protective fencing for archaeology along project limits.
Red line indicates location of protective fencing for archaeology along project limits.
Guardrail layout per current design criteria. Design for a 137' 4 5/8" length of guardrail was rejected due to potential adverse impacts to historic property.
Guardrail layout proposal with reduced length. Design for a 62’ length of guardrail was rejected due to potential adverse impacts to historic property.
Final guardrail design proposal showing a 12.5' length of guardrail, which was considered appropriate.
Google Earth image of Kent-Sheppard house. Note existing guardrail behind temporary traffic signal. The proposed new guardrail will terminate approximately in front of the large tree, thus minimizing the visual effects to this significant property.