



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

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary D. Reid Wilson

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

October 10, 2022

Susan Miller
Uwharrie Ranger District
U.S. Forest Service
789 Biscoe Road
Troy, NC 27371

susan.l.miller@usda.gov

Re: Draft EA for the Moccasin Creek, Dutch John, and Green Gap Road Improvements Project,
Uwharrie National Forest, Montgomery County, ER 20-1621

Dear Ms. Miller:

Thank you for your letter of August 24, 2022, concerning the above-referenced undertaking. We have reviewed the materials submitted and offer the following comments.

According to the new Draft Environmental Assessment, the Uwharrie National Forest (Uwharrie NF) has deleted Alternative 2 and is considering the new Alternative 3 (half paved). Under Alternative 3, the Uwharrie NF recommends the following measures to mitigate the adverse effects on NRHP-eligible archaeological sites, including:

- Phase III data recovery/research design is recommended. This will require a Memorandum of Agreement (MOA) among the lead federal agency, SHPO, other agencies and/or consulting parties prior to the development of a detailed data recovery plan and field investigations.
- Erosion control measures between the intact portion of data recovered sites and the portion of those sites being removed. These measures are meant to ensure the remainder of the sites are left as intact as possible.
- Cemetery boundary determination at 31MG686 and 31MG2194 by Ground Penetrating Radar (GPR) and a cemetery removal/preservation plan in accordance with state laws is recommended.
- Annual monitoring of data recovered sites to review potential impacts from looting, erosion or further damage is recommended.

We expect that Alternative 3, as described, will have adverse effects on four NRHP-eligible archaeological sites (31MG136, 31MG145/258, 31MG1519, and 31MG2121) as well as potential impacts to two State-protected cemeteries (31MG686 and 31MG2194). If Alternative 3 is selected and avoidance of these sites is not possible, we concur with Uwharrie NF on the need of a MOA and development of detailed data recovery plans and/or removal/preservation plans for each of these sites.

We look forward to hearing from you concerning the final Alternative selection and working with you to develop an MOA at that time.

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

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or environmental.review@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,



for Ramona Bartos, Deputy
State Historic Preservation Officer

cc: Crystal Best, NC DOA

crystal.best@doa.nc.gov