



North Carolina Department of Cultural Resources
State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Pat McCrory
Secretary Susan Kluttz

Office of Archives and History
Deputy Secretary Kevin Cherry

August 28, 2014

MEMORANDUM

TO: Vanessa Patrick
Human Environment Unit
NC Department of Transportation

FROM: Renee Gledhill-Earley 
Environmental Review Coordinator

SUBJECT: Historic Structures Survey Report, Improve NC 150 from NC 16 Bypass to I-77, R-2307,
Multi County, ER 12-2211

Thank you for your August 15, 2014, memorandum concerning the above-referenced undertaking and Historic Structures Survey Report. We are pleased that our agencies concur on the historical and architectural significance of the Marshall Steam Plant and its eligibility for listing in the National Register of Historic Places. We will add this information to our files and update the GIS to indicate the property's being determined eligible for listing.

We appreciate your comments about the Terrell Historic District and will note them in our records. As with the review of all such reports, our staff is charged with not considering the potential effects of an undertaking on properties when evaluating their eligibility. Rather, their charge is to consider the information provided about specific properties, in accordance with the applicable regulations and guidance provided by the National Park Service in reaching a conclusion. Thus, as noted, we continue in our belief that the Terrell Historic District retains its integrity and adjusting the boundaries at this time is unwarranted.

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 919-807-6579 or renee.gledhill-earley@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

cc: Mary Pope Furr, NCDOT

mfurr@ncdot.gov



STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

PAT MCCRORY
GOVERNOR

ANTHONY J. TATA
SECRETARY

MEMORANDUM

To: Renee Gledhill-Earley

From: Vanessa E. Patrick

Date: August 15, 2014

Subject: Historic Architectural Resources Survey Report Review, T.I.P No. R-2307, Lincoln, Catawba, and Iredell Counties. ER 12-2211.

Thank you for your recent review of the R-2307 historic architectural resources survey report conveyed in your memorandum of May 12, 2014. We are pleased that you concur with our recommendations that the **Johnson Neel House** (ID0004) remains eligible for listing in the National Register of Historic Places and the **Berea Baptist Church and Cemetery** (ID1090) does not meet the criteria for eligibility. We have considered your comments about a proposed boundary reduction for the National Register-listed **Terrell Historic District** (CT0378) and the eligibility of the **Marshall Steam Station** (CT1303) and offer the following observations.

We accept that the case for reducing the National Register boundary of the **Historic Terrell District** is, as yet, not sufficiently proven. We feel compelled to emphasize that our argument for reducing the boundary is grounded in the undermining of visual, spatial, and functional connectivity through demolition of contributing resources and addition of intrusive elements, rather than the diminishing of individual building integrity. It seems precisely the loss of the outbuildings associated with the Walter Gabriel House and the James Gillin House, as well as other resources like the grist mill and cotton gin, coupled with the imposition of more recent construction that has compromised the settings of the properties and created discontinuities within the historic district. Please note that the construction dates for the "red-square" buildings are provided in the final paragraph of page 55 of the report. In future, we shall insure that any resources proposed for removal from or addition to an established historic district are fully represented photographically. Since the completion of the report, we have become acquainted with the range of design alternatives now under

consideration and can state that, with or without a boundary reduction, the Terrell Historic District likely will be affected by the R-2307 project. As is customary, we shall schedule a consultation with you if the selected alternative presents an effects situation.

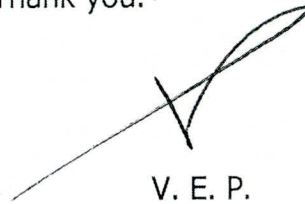
The eligibility assessment of the **Marshall Steam Station** presented in the report is based not only on chronology, but also rarity. Several other steam plants are identified on page 67, and the Allen Steam Station is specifically cited because it is the most similar to the Marshall structure in design and age. The recent decommissioning of coal-fired power facilities by Duke Energy is also noted and, admittedly, should have been more carefully considered when formulating the eligibility recommendation. We agree that a stronger context is needed and, to that end, we have revisited some of the relevant sources and assembled a brief, preliminary framework for evaluation.

The attached table presents fourteen coal-fired power plants owned by Duke Energy in North Carolina. Since 2011, eight have ceased operation and five of the eight have been demolished. The Marshall Steam Station is now one of the six remaining Duke Energy facilities and one of four built prior to 1966. The Global Energy Observatory databases (<http://globalenergyobservatory.org>) currently list a total of twenty-eight coal-fired power plants in North Carolina, including the Duke Energy fourteen. Ten of the "non-Duke" structures date to the 1970s-1990s, suggesting that the significance of the Marshall Steam Station is greater than initially calculated. The retrofitting, closure, and demolition of coal-fired power plants is intensifying both in North Carolina and nationally, thus insuring diminishing numbers of this particular industrial building type. Only a handful of steam plants and other power generating structures are represented in the state survey (Cape Fear (CH0676), Cliffside (CL0015), and Allen (GS1452) are minimally recorded) and elsewhere, including the Historic American Engineering Record, and they are virtually absent from the scholarly literature. Indeed, the industrial archaeology of the twentieth century is an increasingly urgent subject for historical investigation.

Given the imminent transformation, if not total disappearance of a building type of which the Marshall Steam Station is one of only a few standing examples, we wish to revise our recommendation and consider the resource eligible for the National Register. In the absence of a fully developed context for the building type, we nevertheless believe that the current decommissioning program adopted by Duke Energy provides adequate justification for recognizing a facility that also remains essentially intact, continues to fulfill its original function, and is one of the earliest such structures built in North Carolina. We agree with the

statement in your memorandum that "if the Marshall Steam Station is one of the oldest, then it would be of exceptional significance as a source of power needed for the growing state in the early 1960s." We suggest that the National Register boundary contain that part of the current tax parcel delineated on the survey map section in Figure 3 (page 4) of the report and follow the existing right-of-way along NC 150. Several of the proposed alternatives for the R-2307 project are located near the Marshall Steam Station. While it appears that the resource can be avoided, we shall, of course, discuss any possible effects with you when an alternative is selected.

Should you have any questions, please do not hesitate to contact me at 919-707-6082 or vepatrick@ncdot.gov. Thank you.



V. E. P.

Copy to: Zahid M. Baloch
John G. Conforti
Jennifer Harris

Duke Energy Coal-Fired Power Plants in North Carolina

ONLINE	NAME	COUNTY	RETIRED	DEMOLISHED
1923	Cape Fear Plant*	Chatham	2012	Pending
1926	Buck Steam Station*	Rowan	2011-2013	Pending
1929	Riverbend Steam Station	Gaston	2013	2013
1940	Cliffside Steam Station*	Cleveland	2011	2013
1949	Dan River Steam Station*	Rockingham	2012	2013
1949	W. H. Weatherspoon Plant	Robeson	2011	2013
1951	H. F. Lee Steam Station*	Wayne	2012	2013-2014
1954	Sutton Steam Station*	New Hanover	2013	
1957	Allen Steam Station	Gaston		
1964	Asheville Plant	Buncombe		
1965	Marshall Steam Station	Catawba		
1966	Roxboro Steam Plant	Person		
1974	Belews Creek Steam Station	Stokes		
1983	Mayo Plant	Person		

*replaced on-site by later, oil- or gas-fueled facilities retaining original name

Source: www.duke-energy.com/power-plants/frachised.asp and www.duke-energy.com/about-us/decommissioningprogram.asp, viewed August 2014