



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

Ramona M. Bartos, Administrator

Governor Roy Cooper  
Secretary Susi H. Hamilton

Office of Archives and History  
Deputy Secretary Kevin Cherry

June 6, 2019

MEMORANDUM

TO: Vanessa Patrick  
Human Environment Unit  
NC Department of Transportation

FROM: Renee Gledhill-Earley *Renee Gledhill-Earley*  
Environmental Review Coordinator

SUBJECT: Replace Pomona Block Culvert on SR 2735 (Sockwell Road) carrying an Unnamed Tributary of Reedy Fork under SR 2735, 15-12-0009, Guilford County, ER 19-1707

Thank you for your May 6, 2019, memorandum concerning the above-referenced undertaking and the discovery of a Pomona-Block culvert used in road construction. Based on the information provided, we agree that the culvert is eligible for listing in the National Register of Historic Places under Criteria C and D. While we understand that the resource has been assigned the site number 31GF561\*\* by the Office of State Archaeology, we will assign it a structures number so that it appears on our HPOWEB map on-line.

We also agree that with the finding of adverse effect and look forward to reviewing your draft Memorandum of Agreement and accompanying Data Recovery Plan as this is a federal action requiring a permit from the Army Corps of Engineers and their compliance with Section 106 of the National Historic Preservation Act.

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

Sincerely,

*Renee Gledhill-Earley*

*for* Ramona Bartos, Deputy  
State Historic Preservation Officer

cc: Mary Pope Furr, NCDOT, [mfurr@ncdot.gov](mailto:mfurr@ncdot.gov)  
Paul Mohler, NCDOT, [pjmohler@ncdot.gov](mailto:pjmohler@ncdot.gov)



Received: 05/14/2019  
State Historic Preservation Office

STATE OF NORTH CAROLINA  
DEPARTMENT OF TRANSPORTATION

ROY COOPER  
GOVERNOR

JAMES H. TROGDON, III  
SECRETARY

To: Renee Gledhill-Earley

ER 19-1707

From: Vanessa E. Patrick

Date: May 6, 2019

Due -- 5/30/19

Subject: *National Register of Historic Places Eligibility Recommendation.  
Pomona-Block Culvert, SR 2735 (Sockwell Road), Guilford County.  
WBS No. 17BP.7.C.17. PA Tracking No. 15-12-0009.*

H-

ER letters  
BSE  
5/24/19

NCDOT Highway Division 7 proposes to replace the culvert carrying an unnamed tributary of Reedy Fork under SR 2735 (Sockwell Road) in Guilford County (see attached maps). Proving, once again, that the simplest and most straightforward projects often reveal resources of considerable significance, the culvert in question is built of segmental and rectangular block manufactured by the Pomona Terra-Cotta Company (1886-1975) near Greensboro. It is a virtually unaltered example of a short-lived construction method based on hollow structural tile favored by some central North Carolina road builders during the early years of the twentieth century. You will recall that in 2010 NCDOT Archaeology and Historic Architecture conducted field investigation and documentary research of Pomona-block culverts as part of the mitigation for replacing a 1916 example in Randolph County.<sup>1</sup> Needless to say, we are delighted to add the Sockwell Road culvert to our list of such structures documented in the Piedmont.

316F 5/6/19\*\*

The report we prepared in 2010 is the only study of culverts from a material cultural vantage point to be undertaken in North Carolina and, to my knowledge, one of the few such investigations available nationally. The history of culvert construction and, specifically, early-twentieth-century roadbuilding in Piedmont North Carolina presented in the report established contexts for identifying and evaluating any remaining examples of the structure type that may be discovered in future. More immediately, our study found that the Randolph County culvert which inspired it was eligible for listing in the

<sup>1</sup> Mohler, Paul J., Penne Sandbeck, and Vanessa E. Patrick, "Creative Mitigation at Site 31RD1470\*\*:  
Removal of Pomona Terra-Cotta Tile Culvert along Unnamed Tributary of Polecat Creek under SR 2116  
(New Salem Road) in Randolph County, North Carolina, WBS No. 8C.076113, ER 07-1169" (Raleigh:  
North Carolina Department of Transportation, October 2010).

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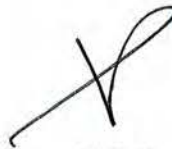
Location:  
1020 BIRCH RIDGE DRIVE  
RALEIGH, NC 27610

Website: www.ncdot.gov

National Register of Historic Places under Criterion C for its distinctive mode of construction and Criterion D for its potential to yield new information about the industrial history of its region. Like the Randolph County example, the Sockwell Road culvert (see attached photographs) is composed principally of segmental terra-cotta block, but of the “Pomona 84” rather than the “Pomona 48” variety (numbers refer to the circumference in inches the blocks create). Unlike the Randolph County example, the Sockwell Road culvert employs rectangular Pomona block rather than mortared stone for its foundation walls. The latter also dispenses with Randolph County’s wing walls, but its head walls are of a similar stone rubble composition. The Sockwell Road culvert thus displays the same qualities and level of integrity that defined the significance of the Randolph County culvert. It also offers another opportunity to record and analyze an example of what appears to have been a comparatively rare structural type, nevertheless important in the transportation history of North Carolina. Of the eleven Pomona-block culverts identified in the field or in the historical record during the 2010 investigation, most are now no longer extant.

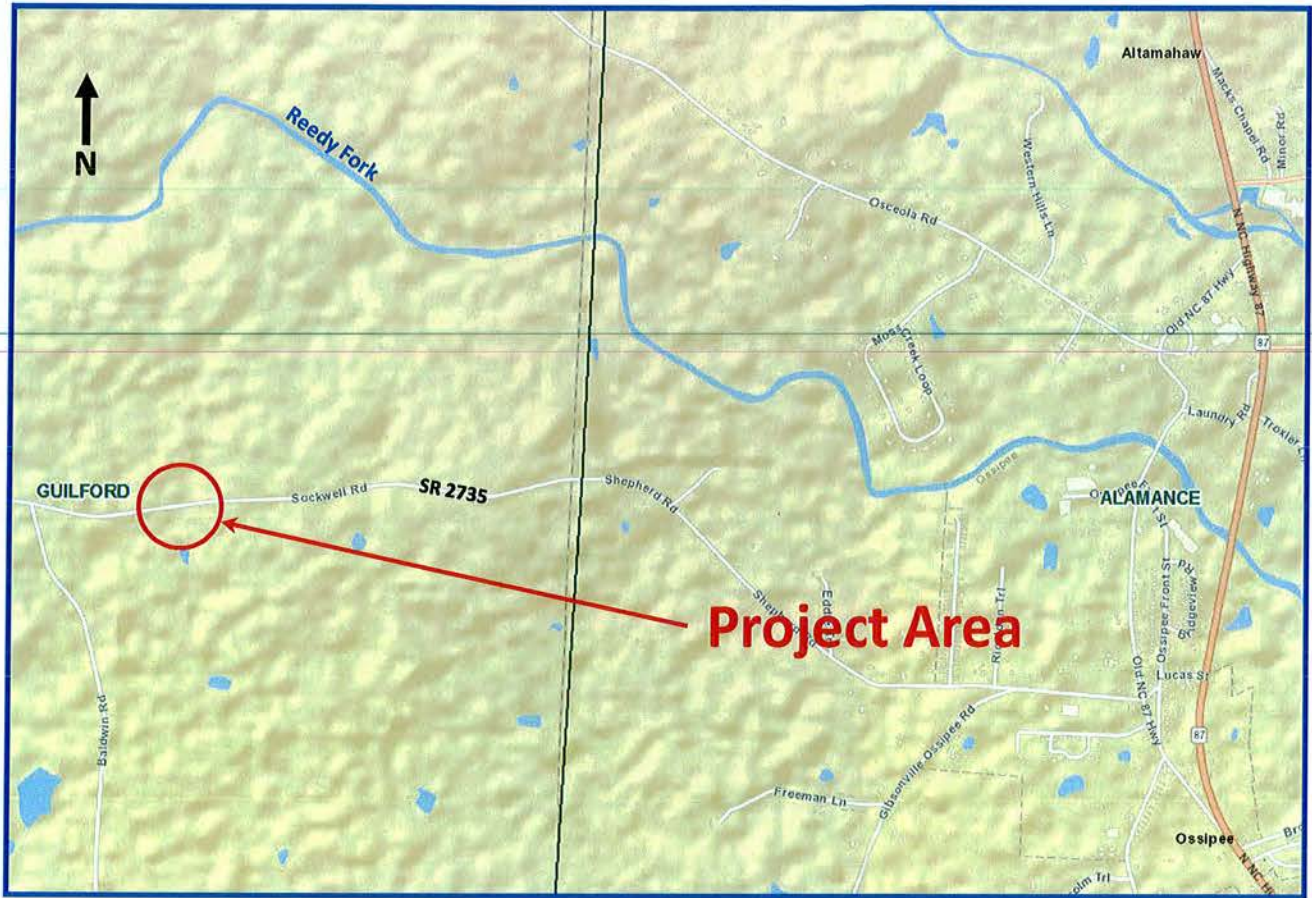
The proposed Guilford County project calls for the replacement of the existing culvert with a 66-foot-long, corrugated metal pipe with headwalls in the same location. As it necessitates the demolition of the Pomona-block culvert, the project clearly will impose an adverse effect on the resource, assuming it to be determined eligible for the National Register. The project is state funded and will require a federal (USACE) permit, so it is subject to Section 106 compliance. In anticipation of confirmed eligibility and adverse effect findings, Paul Mohler and I have assembled a mitigation plan including full photodocumentation, as well as partial excavation, retrieval, and curation of representative Pomona blocks. We also have met with staff of the NCDOT Photogrammetry Unit, who will carry out terrestrial LiDAR scans of the culvert and produce 3-D renderings that may be used to produce as-built drawings to HABS/HAER standards. The Office of State Archaeology has agreed that the Sockwell Road culvert is eligible for listing in the National Register under Criteria C and D and that it will be adversely affected by the proposed project; OSA has assigned the site number 31GF561\*\* to the culvert. Given the extensive research and evaluation already in hand and the character and integrity of the resource in question, NCDOT Historic Architecture also recommends the Sockwell Road culvert as eligible under Criteria C and D.

Thank you for considering our recommendation. Should you have questions or need additional materials, please let me know.

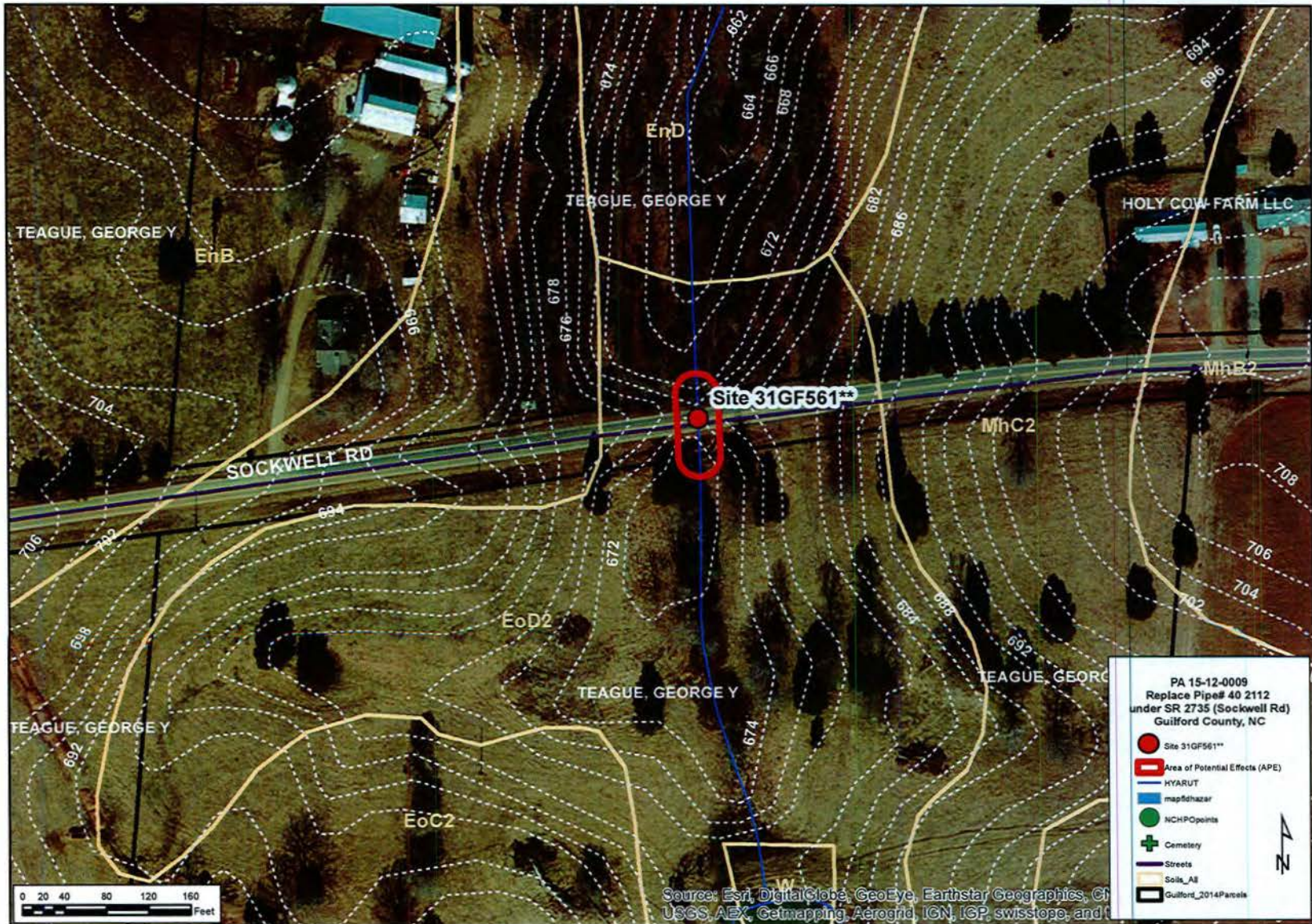


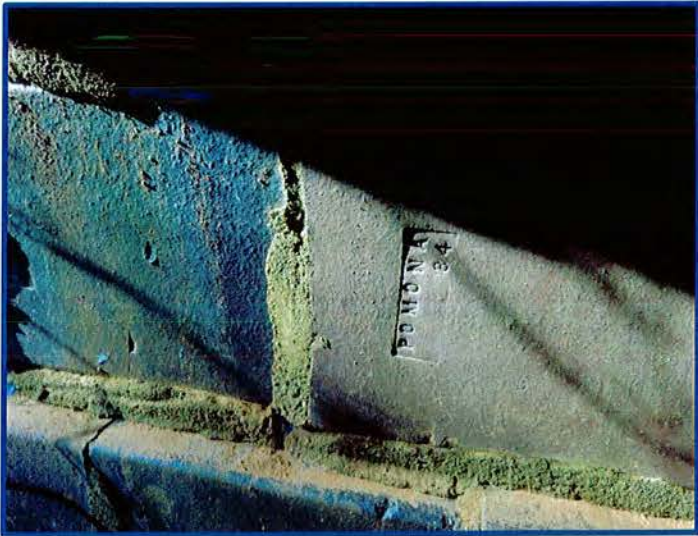
V.E.P.

Attachments



Replacement of Pipe No. 402112      Guilford County  
SR 2735 (Sockwell Road)      Base map: HPOWeb, nts





**Arch Culvert (Pipe #402112)      SR 2735 (Sockwell Road)      Guilford County**  
**Looking north (above). Details of Pomona block and headwall at south end (below).**  
**Photographed 13 January 2016.**



**Arch Culvert (Pipe #40 2112) SR 2735 (Sockwell Road) Guilford County  
Looking south (above).**

**Detail of segmental and rectangular Pomona block at south end (below).  
Photographed 13 January 2016.**



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**Looking north (above). Details of Pomona block and headwall at south end (below).**  
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