

# Assessment of Effects for the Phase II- RUS Bus Project

Raleigh, Wake County, North Carolina



New South Associates, Inc.



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Report submitted to:

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January 20, 2021 • Final Report  
New South Associates Technical Report 4106



# MANAGEMENT SUMMARY

New South Associates (New South) prepared this assessment of effects for the proposed Research Triangle Regional Public Transportation (dba GoTriangle) Phase II Raleigh Union Station (RUS) Bus Development in downtown Raleigh, Wake County, North Carolina. The prime consultant, WSP, is under contract with GoTriangle. The project may be partially funded by the Federal Transit Administration (FTA), which subjects the undertaking to the requirements of the National Environmental Policy Act (NEPA) of 1970 and Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended. The proposed project would construct a facility on three parcels (totaling approximately 1.72 acres) owned by GoTriangle at 200 South West Street, 206 South West Street, and 210 South West Street.

FTA defined the project's Area of Potential Effects (APE) for historic architecture in consultation with the North Carolina State Historic Preservation Office (HPO). The APE incorporates all new project construction and the surrounding viewshed which was defined as the areas adjacent to the project site due to the urban landscape, existing rail lines, and high traffic roadways that provide distinct visual boundaries (Figure 1). Project construction would include a proposed mixed-use bus transfer facility comprised of two towers with ground floor retail and structured parking: one residential tower would contain approximately 277 mixed-income residential units with ground floor retail, and the second 18-story tower would house a hotel and office space. The 18-story tower would be connected to the existing Union Station by a pedestrian bridge.

On behalf of GoTriangle, and in consultation with FTA and the HPO, New South completed a historic architecture survey of the APE that documented 17 architectural resources, 13 of which had been previously surveyed by the HPO. The APE contains portions of one district listed in the National Register of Historic Places (NRHP): the Depot Historic District (WA0724), which was expanded in 2017 with the Depot Historic District Boundary Increase (WA7774). An additional expansion area, the Depot Historic District Expansion (WA6524), was determined eligible for NRHP listing in 2013. As a result of New South's study, the Depot District Expansion (WA6524), was recommended not eligible for listing in the NRHP. Also, as a result of the 2020 study, two resources in the APE were recommended eligible for the NRHP: the Depot Historic District (WA0724) which was expanded in 2017 to include the Depot Historic District Boundary Increase (WA7774) and the previously recorded Dr. Hubert Royster House (WA3007) at 131 South Boylan Avenue. One additional resource, the Nash Square Fire Station (WA8078) at 220 South Dawson Street, was recommended eligible as a contributing resource to the Depot Historic District (WA0724). The HPO concurred with these eligibility findings and recommendations in a letter dated August 21, 2020 (Appendix A).

In consultation with the HPO, New South applied the Criteria of Effect as codified in 36 CFR 800.5 in compliance with Section 106 of the NHPA to assess the impacts of the proposed project on the NRHP-listed and eligible resources in the APE. As a result of this assessment, FTA determined that the proposed project would have **no adverse effect** on the NRHP-listed and eligible properties in the APE. No resources were determined to have a potential Section 4(f) use.

The following information was prepared in conjunction with the local government, GoTriangle, FTA, and HPO. Effects recommendations are presented in the table below.

*Effects Determinations*

Survey #	Name	Resource Type	NRHP Status	Effects Determination	4(f) Evaluation
WA0724	Depot Historic District	District	Listed (2002)	No Adverse Effect	No 4(f) use
WA3750	Dr. Hubert Royster House	Dwelling	Determined Eligible (2020)	No Adverse Effect	No 4(f) use

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# TABLE OF CONTENTS

MANAGEMENT SUMMARY .....	i
TABLE OF CONTENTS.....	iii
LIST OF FIGURES AND TABLES .....	v
I. INTRODUCTION .....	1
DESCRIPTION OF PROPOSED UNDERTAKING .....	3
II. METHODS.....	9
BACKGROUND RESEARCH .....	9
FIELD METHODS.....	9
III. RESULTS .....	11
SECTION 106 ASSESSMENT OF EFFECTS .....	12
DEPOT HISTORIC DISTRICT (WA0724).....	12
NRHP Determination .....	16
Section 106 Assessment of Effect.....	18
Section 4(F) Evaluation.....	28
DR. HUBERT ROYSTER HOUSE (WA3750).....	29
NRHP Determination .....	29
Section 106 Assessment of Effect.....	31
Section 4(F) Evaluation.....	37
VII. CONCLUSION .....	39
REFERENCES CITED.....	41
APPENDIX A: CORRESPONDENCE	



# LIST OF FIGURES AND TABLES

Figure 1.	Project Location and APE in Raleigh, North Carolina.....	2
Figure 2.	Conceptual Street Level Plan, RUS Bus Station Square Development Proposal, 2020 .....	4
Figure 3.	Conceptual Development Program, RUS Bus Development Proposal, 2020 .....	5
Figure 4.	Conceptual RUS Bus Project Rendering, RUS Bus Station Square Development Proposal, Facing Northwest, 2020 .....	7
Figure 5.	Photographs of the APE, 1 of 2 .....	14
Figure 6.	Photographs of the APE, 2 of 2 .....	15
Figure 8.	Map of the NRHP Boundary of the Depot Historic District (WA0724) and Depot Historic District Boundary Increase (WA7774) and the Proposed RUS Bus Project Location .....	19
Figure 9.	Depot Historic District (WA0724) and the proposed RUS Bus Development, Conceptual Rendering, Hoffman & Associates, Facing Northeast .....	20
Figure 10.	Depot Historic District NRHP Boundary (red) and the Civic Plaza Boarding, Kimley-Horn, 2020 .....	21
Figure 11.	Depot Historic District (WA0724) (Shown in Red) and the Raleigh Skyline, Conceptual Rendering, Hoffman & Associates, Facing East.....	23
Figure 12.	Depot Historic District (WA0724) and the Proposed RUS Bus Development, Conceptual Rendering, Hoffman & Associates, Facing Northeast .....	25
Figure 13.	Depot Historic District (WA0724) and the Proposed RUS Bus Development, Conceptual Rendering, Hoffman & Associates, Facing Northeast .....	26
Figure 14.	Dr. Hubert Royster House (WA3750), May 2020, Facing Northeast.....	30
Figure 15.	NRHP Boundaries of the Dr. Hubert Royster House (WA3750).....	32
Figure 16.	Dr. Hubert Royster House in Relation to the Proposed RUS Bus Development .....	33
Figure 17.	View East to the Proposed RUS Bus Development, April 2019.....	34
Figure 18.	Proposed RUS Bus Development from West of Downtown, Conceptual Rendering, Hoffman & Associates.....	35
Table 1.	Effects Determinations .....	3
Table 2.	Current NRHP Status of Surveyed Resource .....	11
Table 3.	Surveyed Resource Recommended NRHP-Eligible.....	12
Table 4.	Study Listed Resources in Both the Depot Historic District and the Project APE.....	13

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# I. INTRODUCTION

New South Associates (New South) prepared this assessment of effects for the proposed Research Triangle Regional Public Transportation (dba GoTriangle) Phase II Raleigh Union Station (RUS) Bus Station development in downtown Raleigh, Wake County, North Carolina. The presence of federal funding subjects the project to requirements of the National Environmental Policy Act (NEPA) of 1970 and Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended.

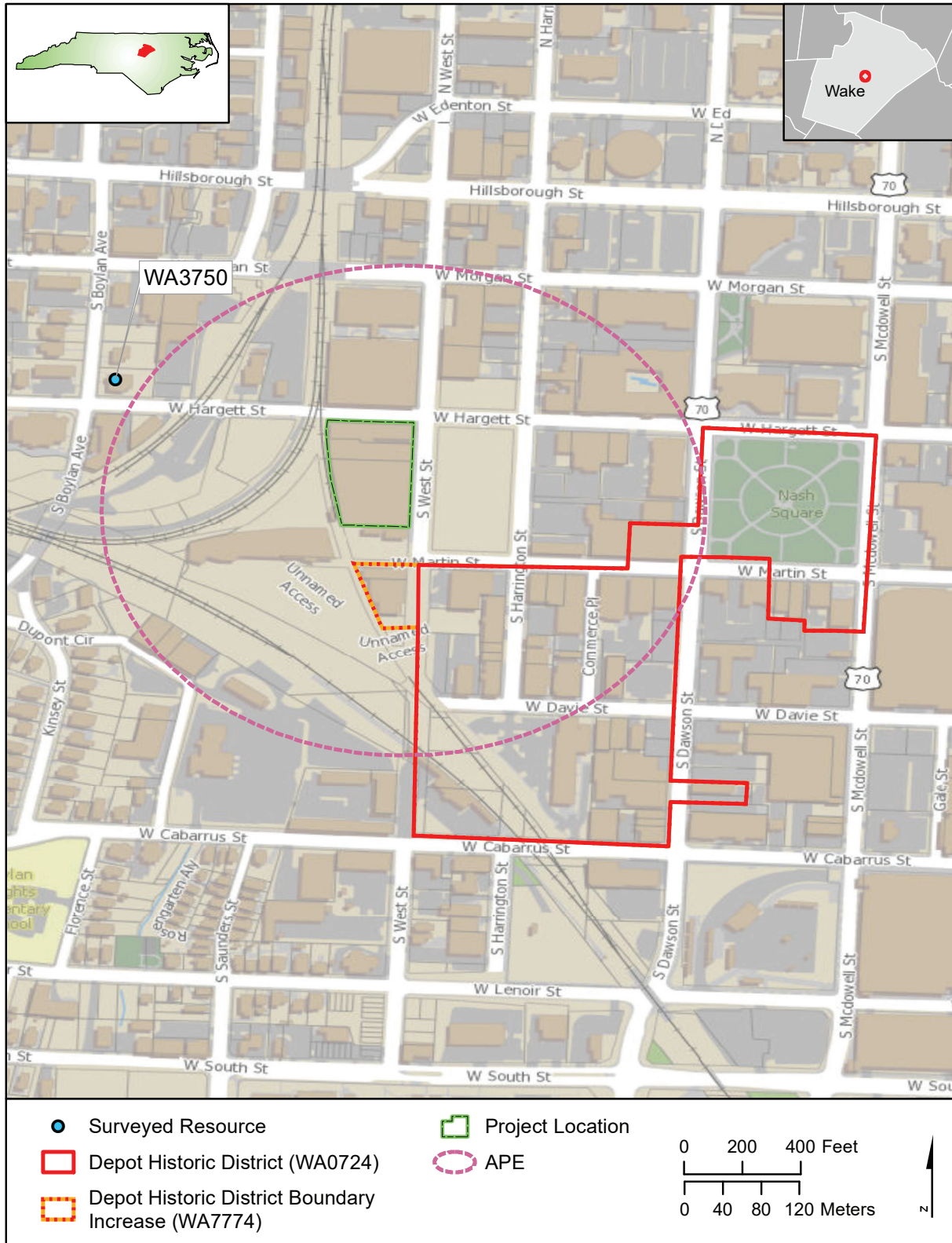
Regulations codified in 36 CFR 800 require GoTriangle and the Federal Transit Administration (FTA) to identify any resources (including above ground buildings, sites, structures, objects, and below ground archaeological resources) of historic significance within the project area. Historically significant resources are defined as properties that are eligible for or listed in the National Register of Historic Places (NRHP) per eligibility criteria codified in 36 CFR 60.4. After historic resources are identified, federal agencies are required to determine if and how the proposed activity would affect the historic resource. If any historic resources would be adversely affected, the federal agency is required to provide the Advisory Council on Historic Preservation (ACHP), an independent federal agency, an opportunity to comment on those effects.

Because the proposed project is transportation related, GoTriangle and FTA are also required to assess the applicability of Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended. This law prohibits the Secretary of Transportation from approving any project that requires the “use” of a historic resource unless there is no prudent and feasible alternative to the proposed use and the project includes all possible plans to minimize harm to the historic resource.

FTA defined this project’s Area of Potential Effects (APE) for historic architecture as the parcels depicted in Figure 1. The APE incorporates all new project construction, including the proposed mixed-use facility, which would contain 277 mixed-income housing units, ground floor retail, structured parking, hotel and office space, and a bus transfer facility for local routes to stop downtown or to connect to bus and rail at Raleigh Union Station. The project also includes a fully integrated on-street bus component with station infrastructure for a proposed BRT system (Figure 1). The proposed BRT system is a separate project currently in the planning phase.

On behalf of GoTriangle, and in consultation with FTA and the North Carolina State Historic Preservation Office (HPO), New South completed a historic architecture survey of the APE that documented 17 architectural resources, 13 of which had been previously surveyed by the HPO. The APE contains portions of one district listed in the National Register of Historic Places

Figure 1.  
Project Location and APE in Raleigh, North Carolina



(NRHP), the Depot Historic District (WA0724), which was expanded in 2017 with the Depot Historic District Boundary Increase (WA7774). An additional expansion area, the Depot Historic District Expansion (WA6524), was determined eligible for NRHP listing in 2013. As a result of New South's study, the Depot Historic District Expansion (WA6524) was determined not eligible for listing in the NRHP, and two resources in the APE were determined eligible for the NRHP: the Depot Historic District (WA0724) which was expanded in 2017 and the previously recorded Dr. Hubert Royster House (WA3007) at 131 South Boylan Avenue. One additional resource, the Nash Square Fire Station (WA8078) at 220 South Dawson Street was recommended eligible as a contributing resource to the Depot Historic District (WA0724). The HPO concurred with these eligibility findings and recommendations in a letter dated August 21, 2020 (Appendix A).

In consultation with the HPO, New South applied the Criteria of Effect as codified in 36 CFR 800.5 in compliance with Section 106 of the NHPA to assess the impacts of the proposed project on the NRHP-listed and eligible resources in the APE. As a result of this assessment, FTA determined that the proposed project would have no adverse effect on the NRHP-listed and eligible properties in the APE. No resources were determined to have a potential Section 4(f) use.

The following information was prepared in conjunction with the local government, GoTriangle, FTA, and HPO. Effects recommendations are presented in the table below.

*Table 1. Effects Determinations*

Survey #	Name	Resource Type	NRHP Status	Effects Determination	4(f) Evaluation
WA0724	Depot Historic District	District	Listed (2002)	No Adverse Effect	No 4(f) use
WA3750	Dr. Hubert Royster House	District	Determined Eligible (2020)	No Adverse Effect	No 4(f) use

## DESCRIPTION OF PROPOSED UNDERTAKING

Research Triangle Regional Public Transportation (dba GoTriangle), with funding made available by FTA, proposes to construct the Raleigh Union Station (RUS) Bus Development in downtown Raleigh, Wake County, North Carolina. The proposed RUS Bus Development is a mixed-use facility featuring an eight-bay bus facility, retail, residential units, office space, and a hotel that would occupy an entire city block bounded by West Hargett Street to the north, South West Street to the east, West Martin Street to the south, and North Carolina Department of Transportation (NCDOT) railroad right-of-way to the west. The development would be comprised of two primary towers flanking a central plaza (Figures 2 and 3).

Figure 2.  
Conceptual Street Level Plan, RUS Bus Station Square Development Proposal, 2020

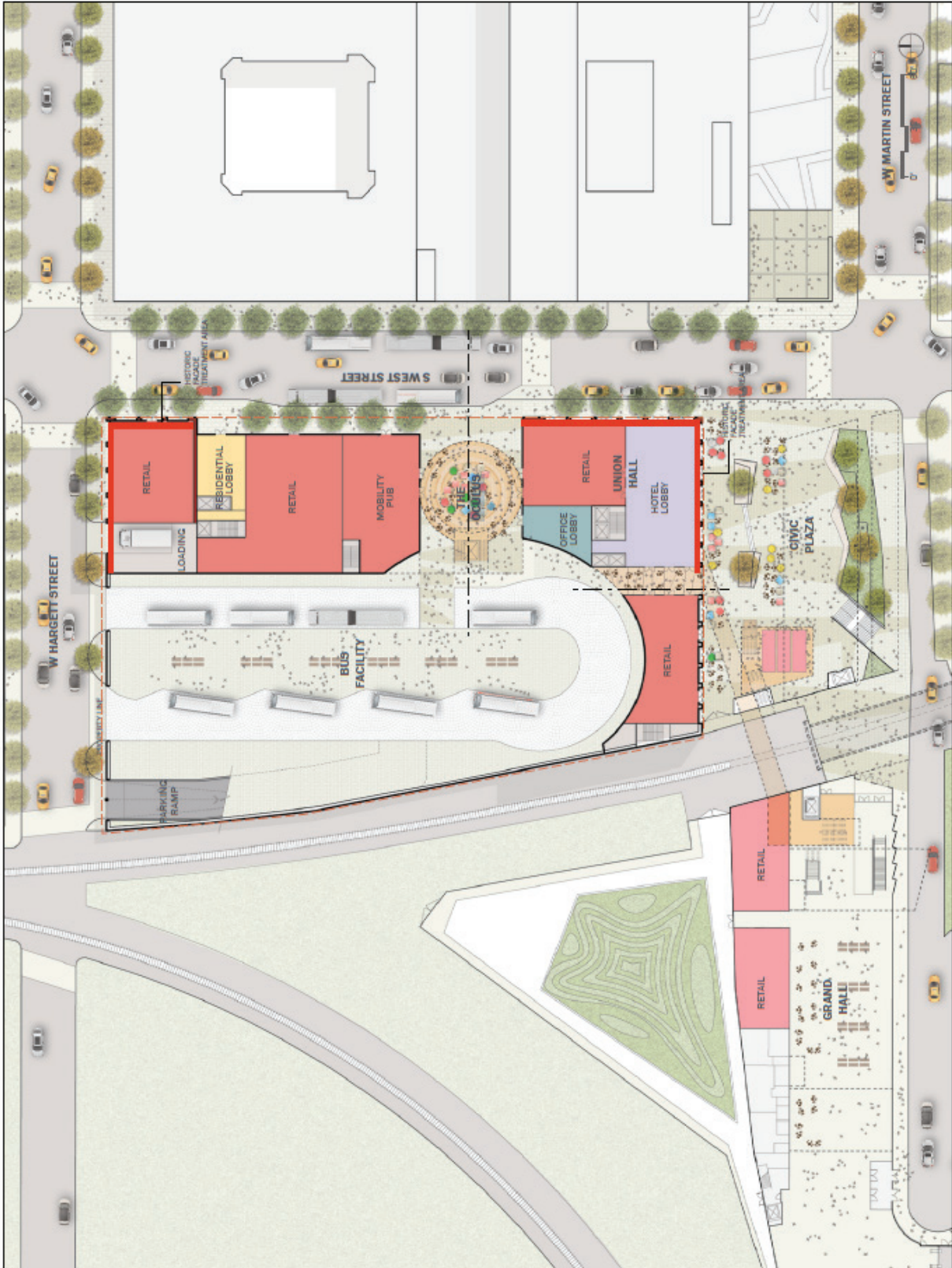
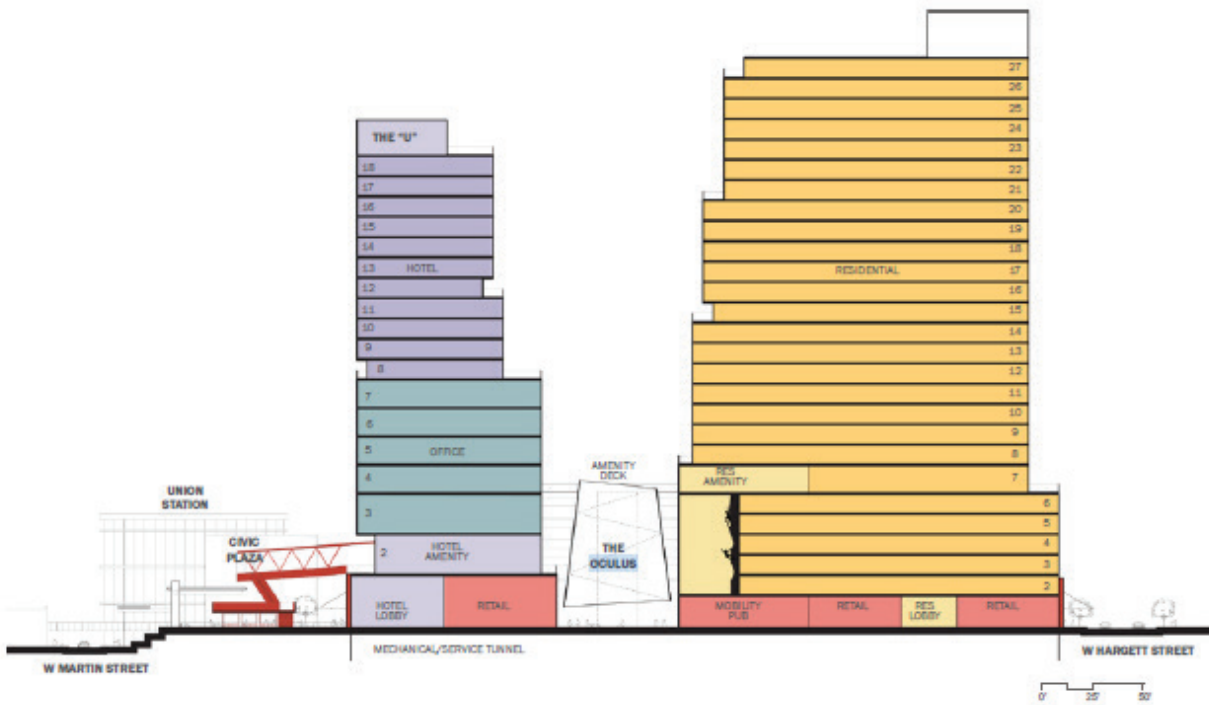


Figure 3.  
 Conceptual Development Plan, RUS Bus Station Square Development Proposal, 2020



USE	GROSS AREA	
RETAIL	15,400 GSF	
MULTIFAMILY	263,125 GSF	277 units
HOTEL	128,485 GSF	181 keys
OFFICE	77,700 GSF	
PARKING	157,415 GSF	514 spaces
TOTAL	642,125 GSF	

**DEVELOPMENT PROGRAM**

Conceptual plans indicate that the northernmost 27-story tower would contain approximately 277 mixed-income residential units. According to preliminary designs, the base of the building would feature a brick façade that wraps the building’s corner near West Hargett Street and South West Street, a nod to the block’s historic industrial use and the character of Raleigh’s Warehouse District. The upper floors would feature a modern blend of brick and glass with terraced balconies. This section of the facility would contain a parking deck, fitness area, outdoor pool, and landscaped seating. As planned, the southernmost building would be an 18-story tower comprised of a hotel and approximately 77,700 square feet of office space and ground floor retail. Union Hall would be situated at the northeast corner of this tower and would connect the street level to the adjacent bus facility. As planned for the adjacent tower, sections of brick façade would wrap the building’s southeast corner in keeping with the surrounding industrial aesthetic while the upper stories would incorporate a modern industrial expression of metal and glass. A pedestrian bridge would extend from the second floor of this tower to Raleigh Union Station (Figure 4).

The RUS Bus development is defined by two public plazas, the existing Civic Plaza at the southernmost end of the block fronting Raleigh Union Station and a central plaza fronting South West Street between the two towers. The project also includes a fully integrated on-street bus component with supporting station infrastructure for a proposed future BRT system. The proposed BRT system is a separate project currently in the planning phase.



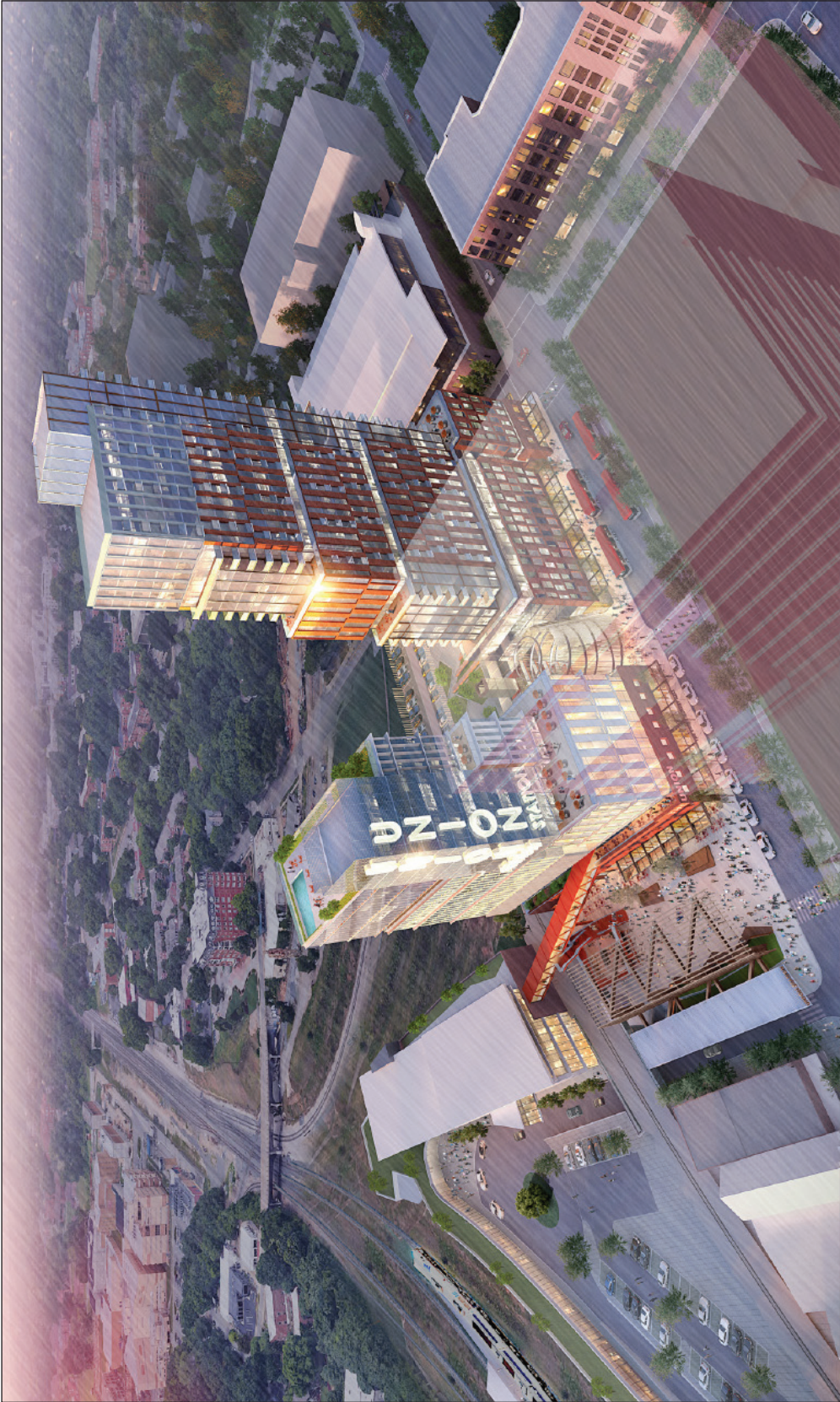


Figure 4. Conceptual RUS Bus Project Rendering, RUS Bus Station Square Development Proposal, Facing Northwest, 2020

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## II. METHODS

### BACKGROUND RESEARCH

The companion architectural survey to this assessment of effects involved background research, fieldwork, and analysis. Due to social distancing measures in place at the time of this survey, New South conducted background research remotely through correspondence with the HPO. This research provided data on previous architectural surveys and recorded sites in the APE to assist in planning and developing contexts for interpretation and evaluation. Historic maps and local histories were reviewed to aid in locating and interpreting historic resources identified during the survey.

### FIELD METHODS

On May 15, 2020, New South historian, Brittany Hyder, conducted a survey of the APE per regulations set forth in 36 CFR. Unless noted, all photographs were taken in May 2020. Renderings and vignettes were provided by GoTriangle, WSP, and Hoffman & Associates and were drafted based on photographs taken in May and October 2020.

Historic properties are evaluated based on criteria for NRHP eligibility specified in the Department of Interior Regulations 36 CFR Part 60: National Register of Historic Places. Cultural properties can be defined as significant if they “possess integrity of location, design, setting, materials, workmanship, feeling, and association,” and if they are 50 years of age or older and:

- A) are associated with events that have made a significant contribution to the broad patterns of our history; or
- B) are associated with the lives of persons significant in our past; or
- C) embody the distinctive characteristic of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that components may lack individual distinction; or
- D) have yielded, or may be likely to yield, information important in prehistory or history.

Ordinarily, cemeteries; birthplaces or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties primarily commemorative in nature; and properties that have achieved significance within the past 50 years are not considered eligible for the NRHP. However, such properties would qualify if they are integral parts of historic districts that do meet the criteria or if they fall within the following categories:

- Criteria Consideration A: a religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- Criteria Consideration B: a building or structure removed from its original location, but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- Criteria Consideration C: a birthplace or grave of a historical figure of outstanding importance if there is no other appropriate site or building directly associated with his productive life; or
- Criteria Consideration D: a cemetery which derives its primary significance from graves or persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- Criteria Consideration E: a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan and when no other building or structure with the same association has survived; or
- Criteria Consideration F: a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- Criteria Consideration G: a property achieving significance within the past 50 years if it is of exceptional importance.

### III. RESULTS

The historic architecture survey conducted by New South for the RUS Bus Project documented 17 architectural resources, including portions of one NRHP-listed historic district and one historic district determined eligible for listing in the NRHP. Thirteen of the resources had been previously surveyed by the HPO. Two resources on the North Carolina Study List are located within the boundary of the Depot Historic District (WA0724) and were assessed as part of the district.

The historic architecture survey determined that the APE contains two NRHP-listed or eligible resources: the Depot Historic District (WA0724), expanded in 2017 with the Depot Historic District Boundary Increase (WA7774), and the Dr. Hubert Royster House (WA3750) at 131 South Boylan Avenue. The HPO concurred with these eligibility findings in a letter dated August 21, 2020 (Appendix A).

Table 3 provides a brief summary of resources in the project's APE that had been listed in the NRHP or formally determined eligible for listing in the NRHP prior to survey. A full inventory and NRHP eligibility recommendations are located in the corresponding report titled *Historic Architecture Survey for Raleigh Union Station Phase II- RUS Bus Project*, page numbers in Table 2 and Table 3 correspond to this separate document.

*Table 2. Current NRHP Status of Surveyed Resource*

Survey #	Location	Name	Resource Type	NRHP Status	Page # in Survey Report
WA0724 and WA7774	21-acre district encompassing five city blocks. Anchored by Nash Square at the northeast corner and the former Seaboard Air Line and Norfolk Southern rail lines at the southeast corner, the district is roughly bounded by South Dawson Street to the east, West Martin Street to the north, and West Cabarrus Street to the south.	Depot Historic District (WA0724) and Depot Historic District Boundary Increase (WA7774)	District	Listed (2002, 2017 boundary increase)	21

As a result of New South's survey, one additional resource in the project APE was recommended eligible for listing in the NRHP. Table 4 provides a brief summary of this resource.

*Table 3. Surveyed Resource Recommended NRHP-Eligible*

Survey #	Location	Name	Resource Type	NRHP Status	Page #
WA3750	131 Boylan Avenue	Dr. Hubert Royster House	Building	Determined Eligible (2020)	74

## SECTION 106 ASSESSMENT OF EFFECTS

Regulations codified in 36 CFR 800 require federal agencies to consider the effect of their agency’s undertaking on historic properties. The regulations used for assessing effects are outlined in 36 CFR 800 “Protection of Historic Properties.” The Criterion of Adverse Effect under 36 CFR 800 is applied below to the NRHP-listed and eligible properties.

An adverse effect is described in 36 CFR 800.5 as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include foreseeable effects by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

### DEPOT HISTORIC DISTRICT (WA0724)

Listed in the NRHP in 2002, the Depot Historic District is comprised of about 40 commercial and industrial buildings constructed between 1880 and the early 1950s in Raleigh’s historic railroad distribution hub. The 21-acre district encompasses approximately five city blocks containing warehouses and infrastructure associated with railroad-related industries that emerged in the late nineteenth century. Situated in the southwest corner of the city’s 1792 grid, the Depot Historic District contains a collection of warehouses and passenger-related buildings that creates a distinct boundary between the city’s historic commercial and institutional center along Fayetteville Street and Capitol Square and the residential areas to the west. The district boundaries include a section of the Norfolk and Southern rail lines at the southwest corner and Nash Square, one of five public spaces laid out in the 1792 Christmas Plan of Raleigh (Little 2002) .

In 2017, the Depot Historic District boundaries were expanded to include the Depot Historic District Boundary Increase (WA7774). This increase shifted the district’s western boundary to incorporate three additional contributing resources east of the former Seaboard Air Line tracks on South West Street: the 1914 Swift and Company Warehouses (WA7775 and WA7776) and Caveness Produce Company Warehouse (WA7777) which was constructed in 1918 and expanded circa 1955. The 2017 boundary expansion nomination states that it is unclear why these buildings were not included in the initial boundaries and “these three properties are the only intact warehouses in this former industrial area that remain unlisted. The boundary increase thus completes the district and extends the historic district west to the railroad corridor, which emphasizes the historic association between the warehouses and the railroad...”(Figure 5) (Alexander and Mattson 2017). An additional expansion area, the Depot Historic District Expansion (WA6524), was determined eligible for NRHP listing in 2013. As a result of New South’s 2020 study, the Depot Historic District Expansion (WA6524) was determined not eligible for listing in the NRHP due to lack of integrity.

While there are no individually NRHP-listed or NHL-designated resources within the district boundaries, two individual resources have been placed on the NC Study List. Two of these resources lie within the APE (Table 4).

*Table 4. Study Listed Resources in Both the Depot Historic District and the Project APE*

Property Name	Designation (Year Listed)	Address
U.S. Rubber Company (WA2981)	Study List (1991)	307-309 W Martin Street
B.F. Goodrich Rubber Company (WA2982)	Study List (1991)	311 -313 W Martin Street

The Depot Historic District is characterized by utilitarian buildings that date between 1880 and 1950 and exhibit commercial styles ranging from restrained examples of the Italianate style, as seen at the 1917 B.F. Goodrich Rubber Company (WA2982) at 311 West Martin Street to the Streamline Moderne mode at 305 West Martin Street. Simple in form and construction, buildings in the district are between one- to three-stories tall and built with load bearing brick. Most buildings are embellished with stepped parapets with cast stone and metal coping, variegated brick facades, and corbeled brick cornices above the storefronts (see Figures 5 and 6).

At the time of listing in 2002, the district contained about 35 buildings, 27 of which were considered contributing to its overall historic character. Aerial imagery reveals that no buildings in the district have been demolished since its listing in 2002. Prior to the district’s listing, key buildings, including the circa 1891 Union Station (WA3656) at 224 South Dawson Street, had

Figure 5.  
Photographs of the APE, 1 of 2



A. 300 Block of South West Street, Depot Historic District Boundary Increase (WA7774), Facing Southwest



B. 300 Block of West Hargett Street, Facing Southeast



Figure 6.  
Photographs of the APE, 2 of 2



A. South Side 300 Block of West Martin Street, Facing Southwest



B. North Side of the 300 Block of West Martin Street, Facing Northwest



C. Contemporary Art and Design Museum of Raleigh, Brogden Produce Company (WA2984) at 409 West Martin Street, Facing Southwest

been significantly altered (see Figure 6). Since 2002, a number of buildings have been adapted for new uses including the Brogden Produce Company (WA2984) building at 409 West Martin Street which was converted into the Contemporary Art and Design Museum of Raleigh (see Figure 6). This building, like many in the district, retains the massing and form of an early twentieth-century industrial building, as well as character-defining exterior elements such as cast stone cornices, metal coping along the roofline, and parapets with stepped ends.

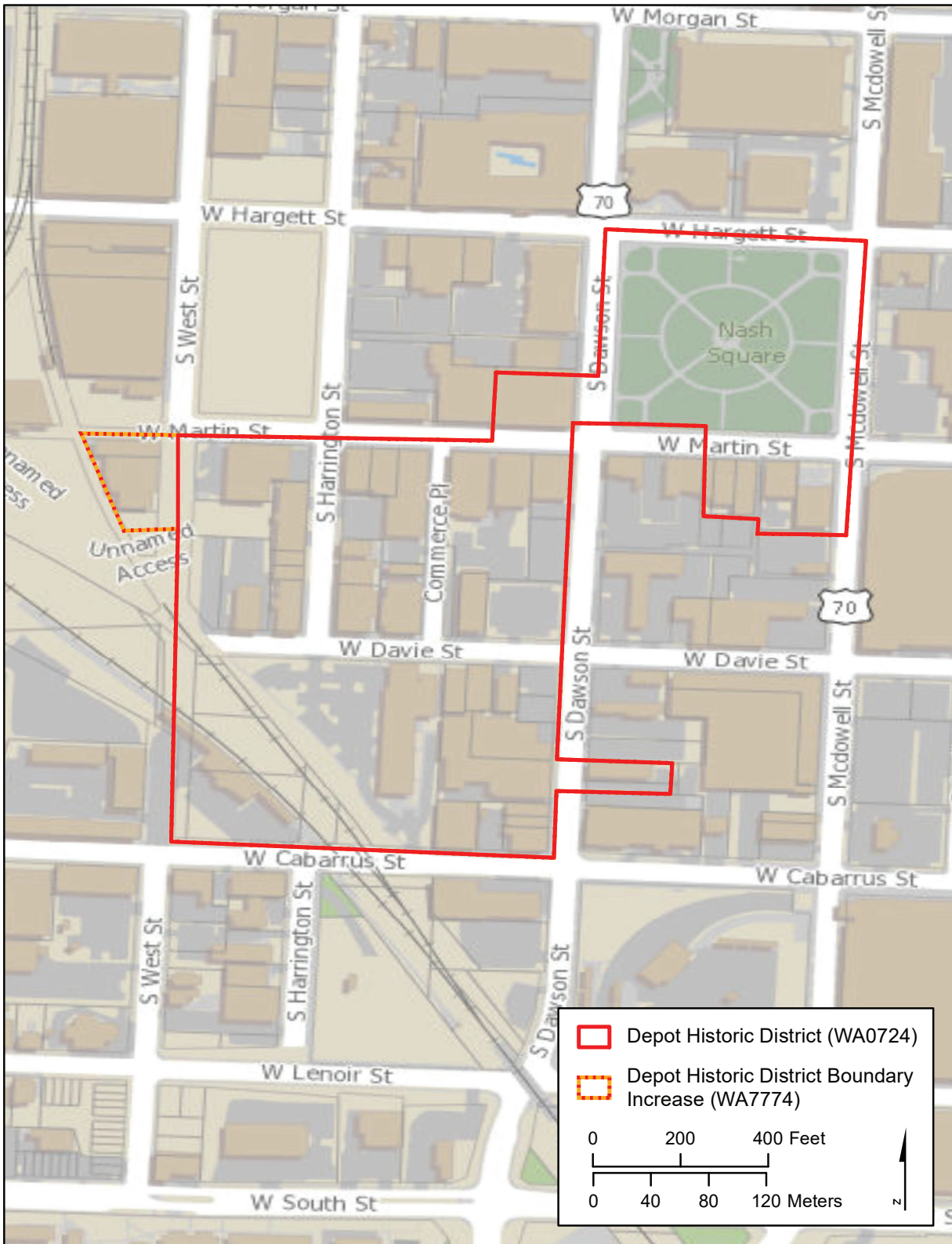
The Depot Historic District retains its original layout. Embellished facades are oriented toward the district's primary thoroughfares, West Martin Street and West Davie Street. Each building's utilitarian features, including loading docks and garage bays, face the secondary streets and alleyways. The district retains its connection to the railroad and active rail lines bisect the southwest corner of the district.

#### NRHP DETERMINATION

The Depot Historic District was listed in the NRHP in 2002. The district boundaries encompass approximately 41 buildings constructed between 1880 and the mid-1950s associated with Raleigh's rail-related industries and wholesale product distribution. The Depot Historic District was listed in the NRHP under Criteria A and C for its significance in industry and commerce and as a significant concentration of industrial, commercial, and railroad-related architecture. The district's period of significance extends from the 1880s to circa 1952 (Alexander and Mattson 2017). The NRHP nomination states that the boundary was selected to encompass the "densest concentration" of historic buildings dating to the period of significance that retain integrity, following legal parcel lines. The boundaries were increased to include three additional warehouse buildings west of South West Street in 2017 (Figure 7).

Though individual buildings in the historic district have been modified since the district's listing, the Depot Historic District retains integrity of location, design, setting, feeling, and association. The district retains its original footprint and most of the historic grid and circulation patterns associated with Raleigh's rail and industrial history. Some of the buildings in the district have been updated with non-historic materials since 2002, but most retained their original massing, form, placement on the lot, and character-defining elements outlined in the 2002 nomination. Additionally, material integrity requirements are less stringent for resources contributing to a NRHP-listed district than for those individually eligible or individually listed in the NRHP. For these reasons, Depot Historic District with its 2017 boundary increase retains sufficient integrity to retain its NRHP-listed status. In a letter dated August 21, 2020, the HPO concurred with this assessment (Appendix A).

Figure 7.  
Map of the NRHP Boundary of the Depot Historic District (WA0724) and Depot Historic District Boundary Increase (WA7774)



Basemap: City of Raleigh GIS

## SECTION 106 ASSESSMENT OF EFFECT

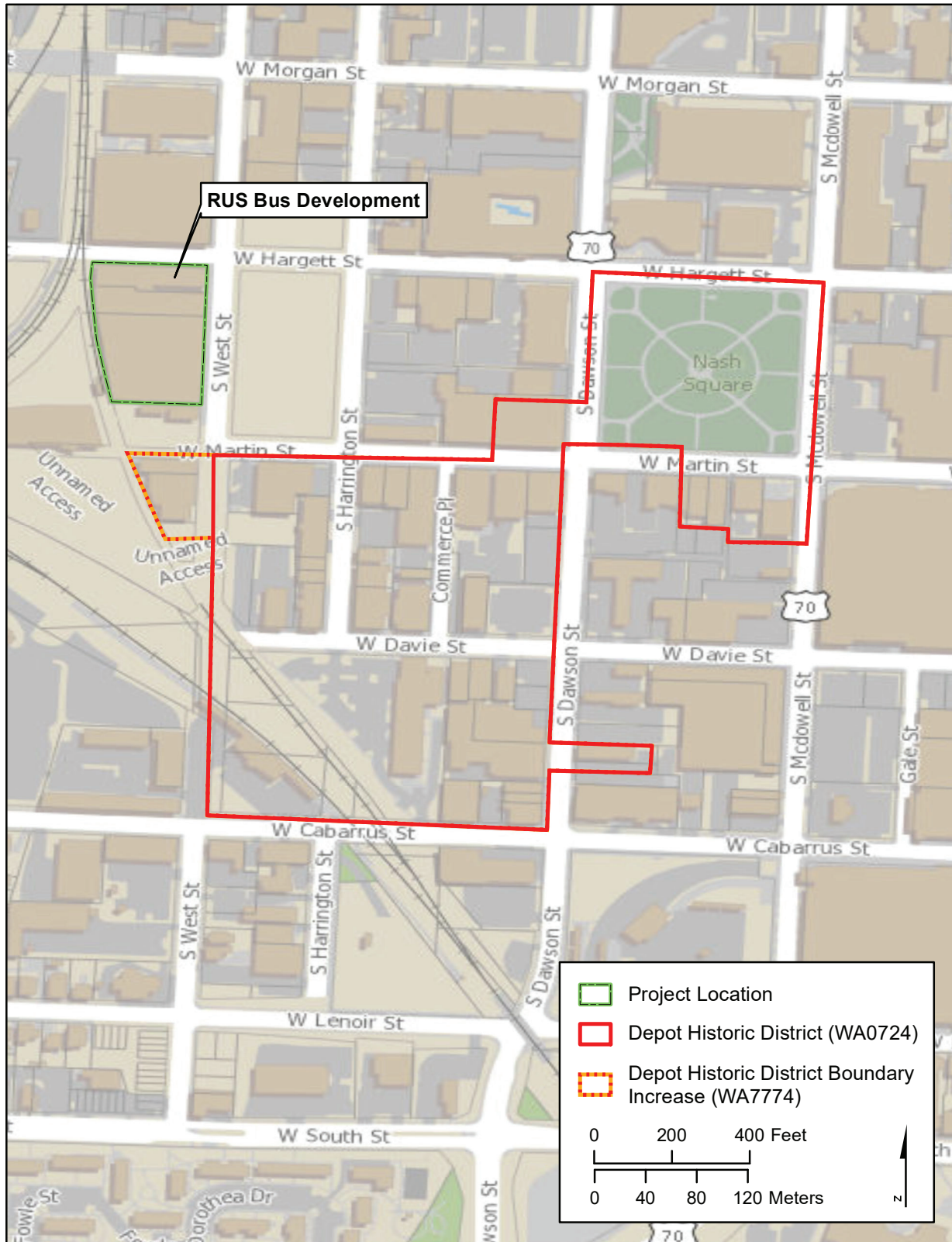
The proposed RUS Bus Development would construct a mixed-use building featuring an eight-bay bus facility, retail, residential units, office space, and a hotel. This development would occupy the entire city block directly north of the Depot Historic District bounded by West Hargett Street to the north, South West Street to the east, West Martin Street to the south, and the former Seaboard Air Line and Norfolk Southern rail lines to the west. The development would be comprised of two primary towers, a 27-story tower and 18-story tower surround an open plaza. The mixed-use facility would be located approximately 120 feet north of the district's northern boundary within the district's northern viewshed (Figure 8 and 9).

In addition to the mixed-use facility, the RUS Bus Development proposes to construct two new bus boarding zones (Civic Plaza Boarding Zone) directly north of the NRHP boundaries of the Depot Historic District. The Civic Plaza Boarding Zone would feature two 85-foot boarding zones near the northeast and northwest corners of West Martin Street and South West Street. Each of these in-lane bus stops features an eight-foot bus boarding zone. Each of these zones would accommodate two 40-foot buses or one 60-foot bus and preserves the existing building facades. The curb line on South West Street would also be preserved (Figure 10).

The new bus zones would be constructed entirely within the existing ROW. On West Martin Street the bus zone would be located within a current eight-foot parking lane. On South West Street, the bus zone would be located in a travel lane that currently houses a bus zone. As part of the project, South West street would be improved with the addition of a six-foot bike lane with a two-foot buffer on the east side of the northbound lane. The easternmost Civic Plaza Boarding Zone would front the Brogden Produce Company (WA2984, now CAM Raleigh) at 409 West Martin Street.

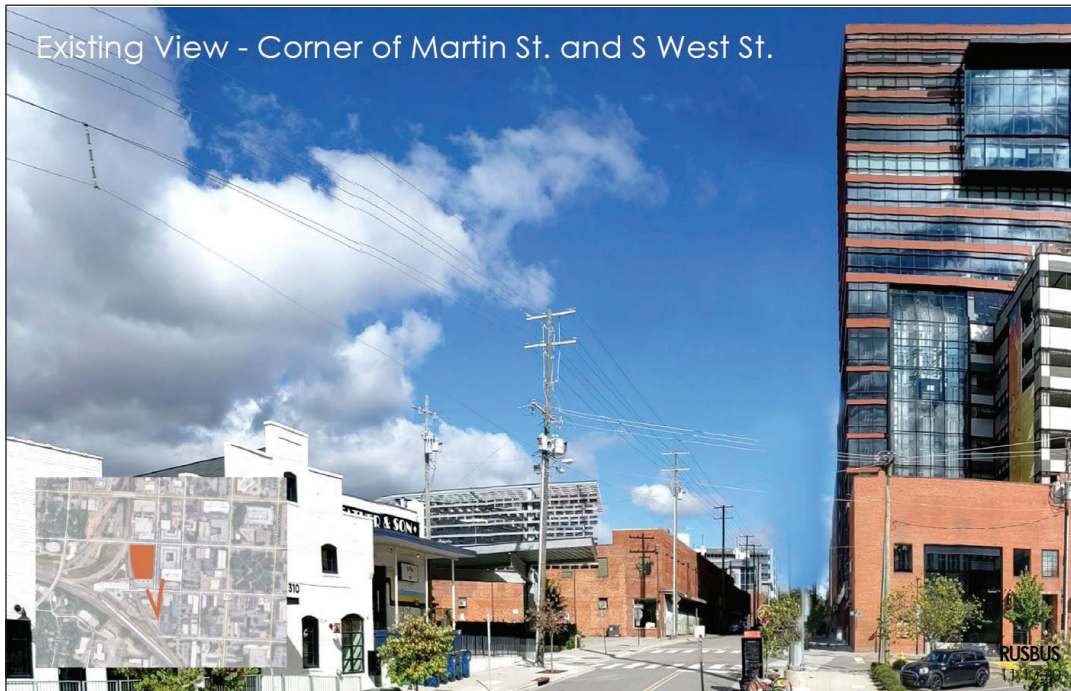
The Depot Historic District is recommended eligible for listing in the NRHP under Criteria A and C for significance in the areas of industry and commerce and as a significant concentration of industrial, commercial, and railroad-related architecture. The current setting of the district features roadside bus stops, signal poles, parking signage, and modern infrastructure. The Raleigh Central Business District skyline is visible to the east. Since 2017, the area directly north of the district has been significantly altered and redeveloped. The district's northern boundary fronts The Dillon, an approximately 17-story mixed-use condominium complex constructed in 2017 that occupies an entire city block. The western district boundary fronts Raleigh's Union Station which was built between 2016 and 2018. The district's boundaries were reevaluated in 2017 when the Depot Historic District Boundary Increase was nominated for the NRHP. The HPO concurred that north side of West Martin Street had been extensively redeveloped and did not retain sufficient integrity to be included in the district boundaries (Alexander and Mattson 2017).

Figure 8.  
 Map of the NRHP Boundary of the Depot Historic District (WA0724) and Depot Historic District Boundary Increase (WA7774) and the Proposed RUS Bus Project Location



Basemap: City of Raleigh GIS

Figure 9.  
Depot Historic District (WA0724) and the proposed RUS Bus Station Development, Conceptual  
Rendering, Hoffman & Associates, Facing Northeast

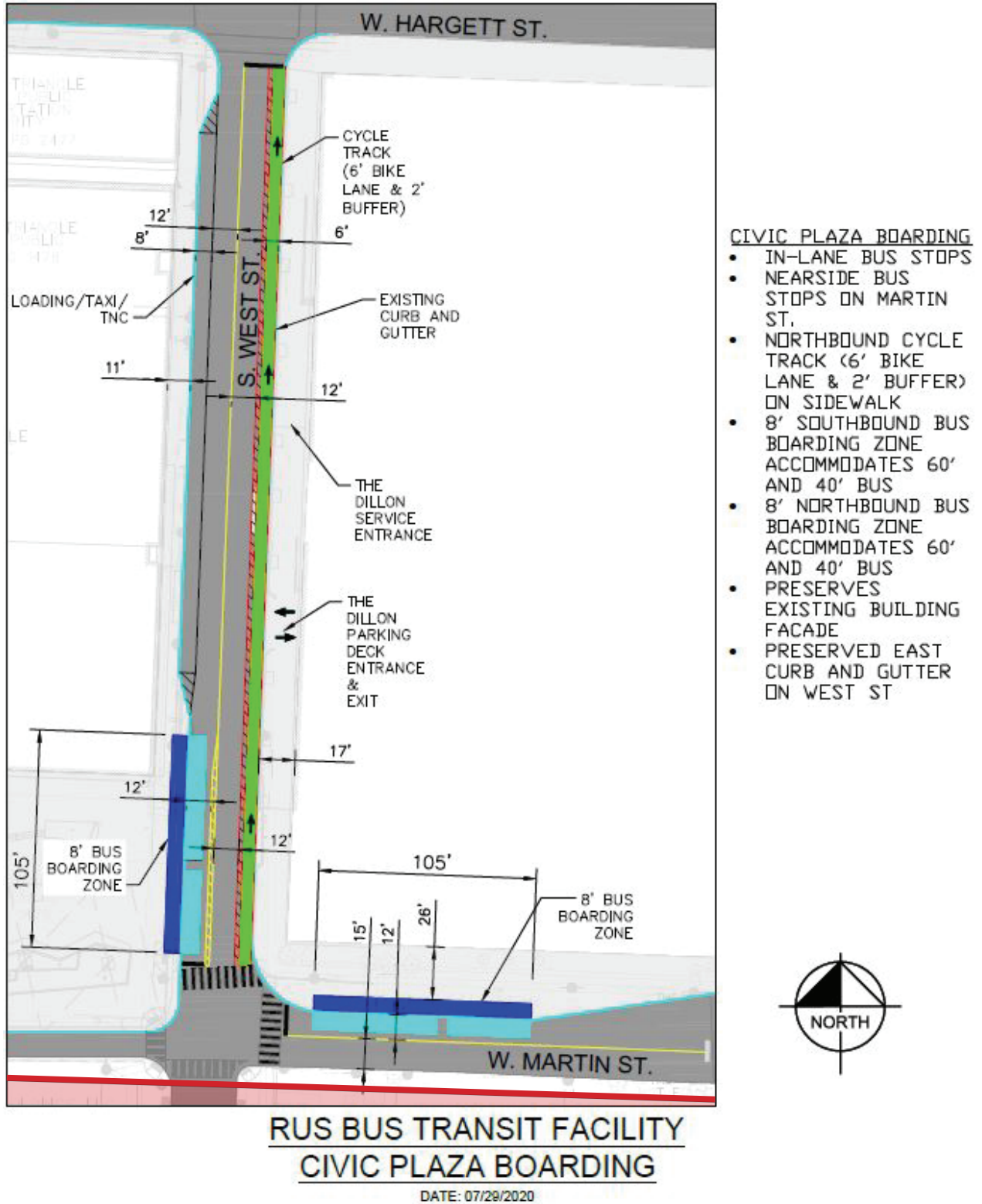


A. Current View Toward the Proposed RUS Bus Development, May 2020



B. View Toward the Proposed RUS Bus Development, May 2020

Figure 10. Depot Historic District NRHP Boundary (red) and the Civic Plaza Boarding, Kimley-Horn, 2020



The project would not require the acquisition of permanent or temporary ROW from the Depot Historic District. The project would have no direct effect to any of the contributing buildings within the district boundaries. The addition of the proposed bus zones and construction of the mixed-use RUS Bus Development would not alter any elements of the district that make it eligible for listing in the NRHP. The Depot Historic District is located just outside of the Raleigh city center and 13 17-plus story buildings are within the district's viewshed (Figure 11). Furthermore, the district's viewshed does not contribute to its eligibility for listing in the NRHP. All construction would take place outside of the district boundaries in a dense urban area setting. While the district is characterized by low-profile two and three-story warehouse buildings, this former industrial hub was historically bounded by diverse land-uses and buildings heights including multi-story offices in the Raleigh Central Business District to the east and the residential areas to the south and west. The addition of the RUS Bus Development would not diminish the integrity of the historic resource's setting, materials, design, location, workmanship, feeling, and association.

#### *Direct Effects*

The proposed project would construct the multi-tower, mixed-use RUS Bus Development and two bus boarding zones directly north and outside of the northern boundary of the Depot Historic District. The proposed bus zone would be approximately 36 feet north of the district's northern NRHP boundary and the proposed RUS Bus Development would be located approximately 128 feet north of the district's northern NRHP boundary. The proposed project would have no direct effect to the Depot Historic District under this criterion.

#### *Use*

The project would have no direct effect to the use of the Depot Historic District. All construction would take place outside of the district's boundary and the section of roadway that would house proposed bus zones would remain under the ownership of the North Carolina Department of Transportation. Project implementation would not result in a change in the character of the property's use.

#### *Physical Features*

The proposed project does not require the acquisition of ROW, temporary, or permanent easements from the Depot Historic District. Physical destruction of or damage to all or part of the property would not occur. The project would not remove any character defining features including rail-related infrastructure or buildings from the district boundaries and would not impact any features that make the district eligible for the NRHP.



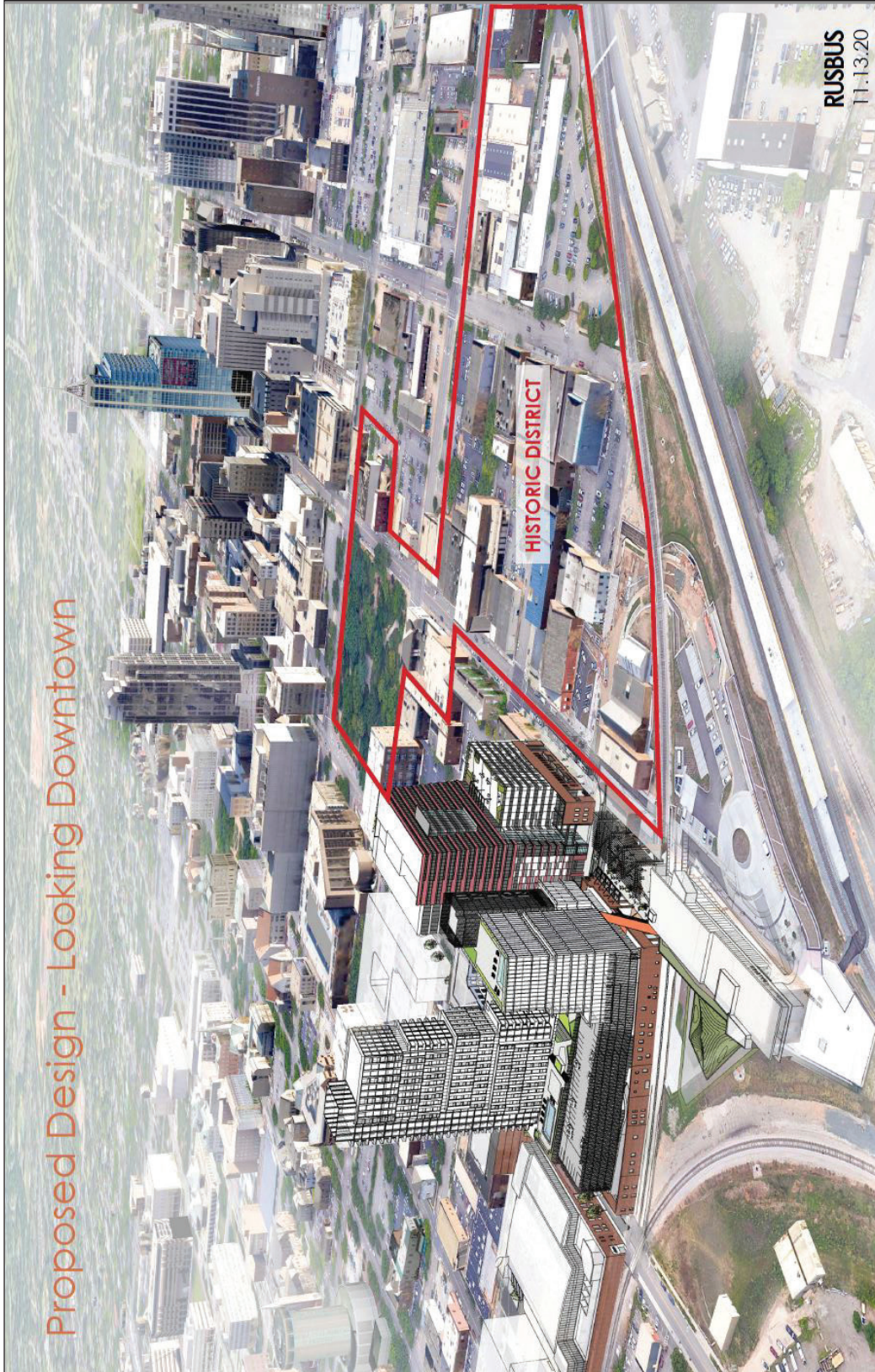


Figure 11. Depot Historic District (WA0724) (Shown in Red) and the Raleigh Skyline, Conceptual Rendering, Hoffman & Associates, Facing East

### *Visual*

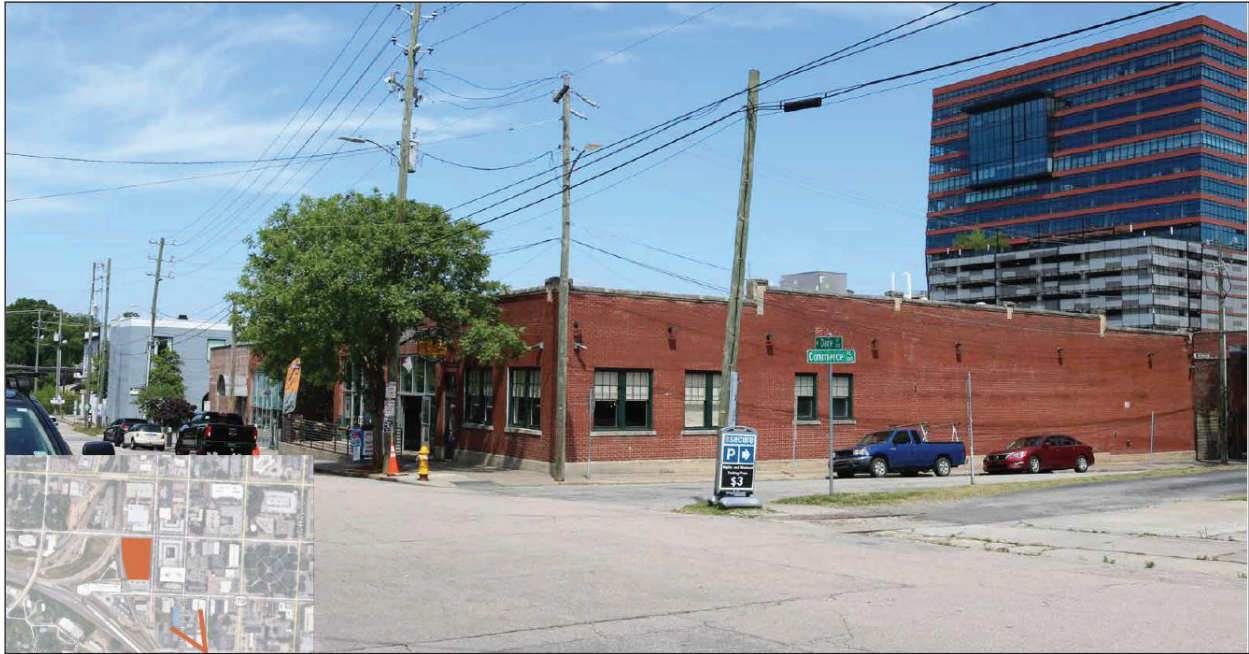
The proposed RUS Bus Development is, at its tallest, an approximately 27-story, mixed-use building that is not out of character for the area immediately surrounding the Depot Historic District. The district is currently bounded to the east by the Raleigh Central Business District and 13 17-plus story buildings are currently within the district's viewshed. The Dillon, a 17-story mixed-use building constructed in 2017, stands just north of the Depot Historic District Boundary opposite the proposed RUS Bus Development on West Street. Raleigh's downtown skyline including the 32-story PNC Plaza, 30-story Wells Fargo Capitol Center, and the 29-story Two Hannover Square are all visible from the Depot Historic District and are situated between one and three city blocks from the district's eastern boundary (approximately 500 to 1,000 feet). In addition to these buildings, five 17-plus story developments are planned for the three-block radius surrounding the Depot Historic District. The addition of a mixed-use, multi-story building would not impose a significant visual effect to the setting of the Depot Historic District (Figure 12 and 13).

Additionally, the RUS Bus Development incorporates materials and design elements reflective of the one-to-three story buildings in the nearby Depot Historic District. The towers' verticality would be humanized with a pedestrian-scaled base along the ground floor that features preserved (or reconstructed) sections of the former warehouse's façade and corner walls. This base would mimic the one-to-three story datum of the Depot Historic District, provide a pedestrian visual experience of an industrial node, and would maintain the area's industrial character with materials that complement the warehouse's original brick façade. The upper stories would be setback from the street level and feature modern materials that are distinguishable from the warehouse base. These sympathetic design measures and existing infrastructure indicate that the proposed project would have no adverse effect to the viewshed of the Depot Historic District. Furthermore, the district's viewshed does not contribute to its eligibility for listing in the NRHP.

### *Atmospheric and Noise*

The RUS Bus Development would be utilized by residents, employees, hotel patrons, and pedestrians. The proposed uses are in keeping with the surrounding developments that include residential, commercial, and office facilities. The development would not introduce significant audible or atmospheric impacts that are out of character for the area within and or just outside the boundaries of the Depot Historic District. Raleigh Union Station has been situated just outside the district boundaries since 2018 and four GoRaleigh bus lines (Chavis Heights, R-Line, South Saunders, and Caraleigh) and one GoTriangle route currently travel through the Depot Historic District. The introduction of the RUS Bus Development and two bus zones is in keeping with the surrounding urban fabric and would not introduce atmospheric and audible elements that are out of character to the Depot Historic District.

Figure 12.  
Depot Historic District (WA0724) and the Proposed RUS Bus Development, Conceptual  
Rendering, Hoffman & Associates, Facing Northeast



A. Current View Toward the Proposed Development from Commerce Place and West Davie Street, May 2020

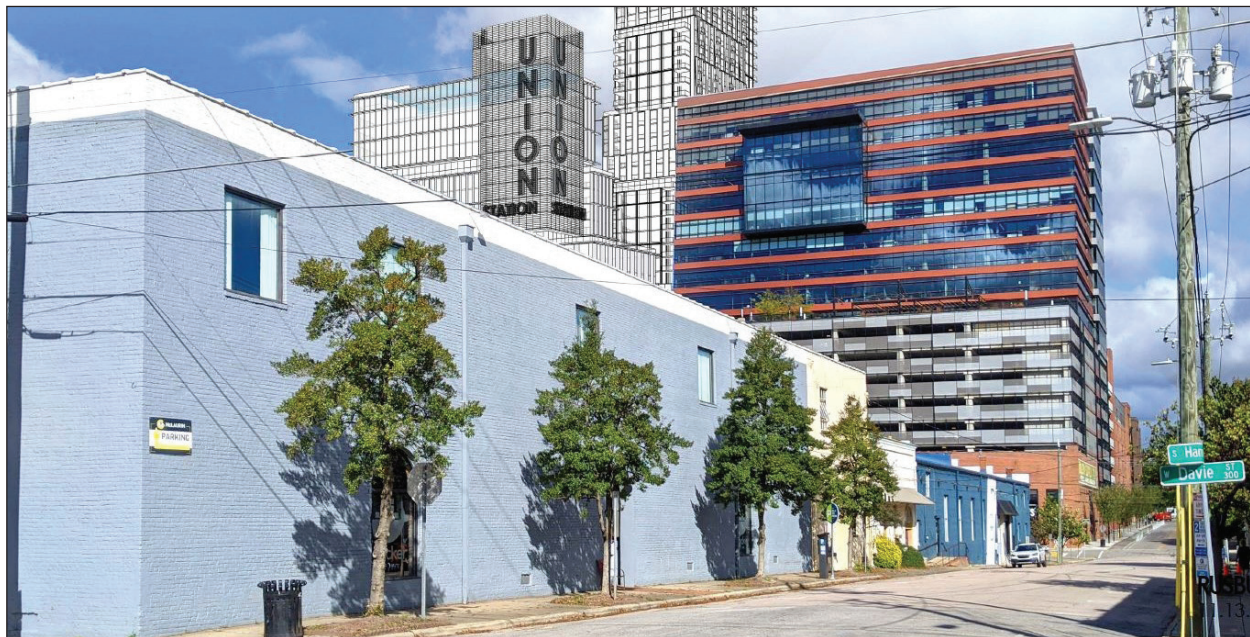


B. Proposed View to the Proposed Development from Commerce Place and West Davie Street, May 2020

Figure 13.  
Depot Historic District (WA0724) and the Proposed RUS Bus Development, Conceptual  
Rendering, Hoffman & Associates, Facing Northeast



A. Current View Toward the Proposed Development from South Harrington Street and West Davie Street, May 2020



B. Proposed View to the Proposed Development from South Harrington Street and West Davie Street, May 2020

### *Indirect and Cumulative Effects*

The Council of Environmental Quality's (CEQ) Regulations for Implementation of the Procedural Provisions of the National Environmental Policy Act (40 CFR § 1500-1508) requires that direct, indirect, and cumulative effects be evaluated. The CEQ defines indirect effects as project effects that are "...caused by the action and occur later in time or farther removed in distance, but are still reasonably foreseeable," and cumulative effects as those effects "...which resulted from incremental impact of the action when added to other past, present and reasonably foreseeable future actions." Transportation improvements are one component of growth and land-use changes. Other aspects to consider include the quality of existing infrastructure and known current and future development plans. Resulting impact may be negative, positive, or neutral and this determination depends on factors such as stipulated land use and zoning.

The proposed project would convert a block of long vacant industrial buildings north of the Depot Historic District NRHP boundary to a mixed-use transportation facility that constitutes Phase II of the Raleigh Union Station development in this node of urban Raleigh. Phase I of the project consisted of the construction of Raleigh Union Station, which opened in 2018 and services approximately ten trains per day. Phase II would provide connectivity between the Amtrak and commuter trains entering Raleigh Union Station and the city's existing bus rapid transit service via a bus facility. This development is consistent with the Future Land Use, Mixed-use and Multimodal Transportation, Transit Accessibility, and Zoning policies outlined in Raleigh's 2030 Comprehensive Plan Update (2019) and facilitates the 37-mile commuter rail project included in the Wake Transit Plan (2016). As such, in October of 2019 the Raleigh City Council voted to approve GoTriangle's request to allow a building of up to 40 stories on the Phase II property (GoTriangle 2019).

Project implementation is not anticipated to have adverse indirect effects to the Depot Historic District. No project construction would take place within the Depot Historic District and the project would not introduce a new access or a new use. While the project may indirectly increase congestion on adjacent roads due to the higher number and frequency of local and regional buses entering and exiting the transit facility, the need for on-street parking may decrease with the addition of the project's parking garage. The project may also indirectly increase development due to the on-site retail stores, and the addition of affordable housing in a currently mixed-use neighborhood.

The proposed project would occur in a developed area outside of the district boundaries where there are few unfilled areas. According to the 2030 Comprehensive Plan, the Depot Historic District is within Raleigh's Central Business District and is presently zoned "Downtown Mixed

Use – Shopfront” with variations in building height allowances ranging from six to 12 stories. “Shopfront” frontage is applied in areas geared toward walkability and preserves the pedestrian visual focus. This zoning designation limits construction to mixed use and civic buildings and dictates that street-facing entrances be spaced no more than 50 feet apart to encourage walkability and engagement with the streetscape. According to the Future Land Use Map, the Depot Historic District is identified as “Community Mixed Use.” Community Mixed Use areas are typically commercial or residential with ground-floor retail. Building heights in these areas generally range from three to five stories and can be limited to 12 stories. Taller buildings should feature “...a pedestrian-friendly relationship to the public realm (City of Raleigh 2019).” These zoning measures aid in preserving the district’s historic feel and pedestrian-oriented design. A change to the Depot Historic District’s current zoning is not proposed as part of the project. Continued use of the district as a commercial node appears likely.

The City of Raleigh proposes to extend South West Street from Martin Street to connect with West Cabarrus Street. Funded by the Federal Railroad Administration, this project is in the early stages of design. Several privately funded mixed-use and residential development projects, both within and adjacent to the Depot Historic District have been approved through the City Planning and Zoning process. These projects, along with RUS Bus Development, may increase traffic, pedestrian activity, and development around the Depot Historic District, however, these private projects would be urban development projects in an urbanized downtown setting and would not disrupt the area’s existing character.

Considering the context and intensity of impacts associated with the project and the incremental cumulative impacts from other planned projects, the proposed project would not result in adverse indirect or cumulative effects to the Depot Historic District.

#### SECTION 4(F) EVALUATION

The proposed project would not require the acquisition of new temporary or permanent ROW from the NRHP boundary of the Depot Historic District. The project would convert a block of vacant industrial buildings to an eight-bay bus transfer facility with an adjoining mixed-use development featuring mixed-income housing, a hotel, office and retail space. Additionally, two 85-foot bus boarding zones built to accommodate two 40-foot buses or one 60-foot bus each would be located on streets traveling north of the Depot Historic District. These improvements would not limit the use of the district and would not permanently remove any of the district’s character-defining industrial buildings. The transportation development would not impair any activities, features, or attributes that qualify the Depot Historic District for listing in the NRHP. Therefore, the proposed project does not constitute a Section 4(f) use of the Depot Historic District.

## DR. HUBERT ROYSTER HOUSE (WA3750)

The Dr. Hubert Royster House (WA3750) was determined eligible for listing in the NRHP in 2020. Situated on a 0.36-acre parcel at the northeast corner of South Boylan Avenue and West Hargett Street, this two-story brick-clad Queen Anne dwelling was purchased by Hubert Royster on December 8, 1902. Royster was an influential physician who practiced in Raleigh from 1897 to 1959. In 1901, Royster married Louise Page of Maryland and moved into the South Boylan Avenue house around December 1902. Royster was a gynecologist at Rex Hospital in 1897 as well as a founding member of St. Agnes Hospital, which served the African American community (Carroll 1994). A gynecologist in a hospital setting in the late 1890s was avant-garde; American medicine had just begun to embrace empiricism and develop pedagogy focused on treating illnesses related to women's physiology in a hospital setting (McGregor 1998). The Roysters moved to Beechridge Road in Raleigh in 1931 and sometime between 1931 and 1936, the dwelling was converted to apartments. The house has been largely unaltered since its initial documentation by HPO in 1976 and retains a slate roof, historic one-over-one windows, and main entrance door with transom and sidelights. The façade features a hipped-roof wrap-around porch supported by brick piers. A series of single and paired Tuscan columns support the porch roof and a heavy wooden balustrade featuring carved brackets extends between each pier. Replacements and additions were limited largely to the dwellings interior and occurred between the mid-1930s and mid-1940s when it was converted from a single-family house to apartments (Figure 14).

### NRHP DETERMINATION

The Dr. Hubert Royster House was determined individually eligible for listing in the NRHP in 2020 under Criteria B and C. The building is associated with Dr. Hubert Royster, a leading surgeon in North Carolina who treated women, the mentally ill, and African Americans during a time when doing so was viewed as progressive in the medical community. He served as president of various medical associations and was esteemed by physicians of national renown. The building at 131 South Boylan Avenue is associated with the beginning of Dr. Royster's medical career in Raleigh between 1902 and 1931 and served as his primary residence. Additionally, the dwelling retains a significant amount of historic material and possesses distinctive characteristics for its type and period. The cantilevered front-gabled towers with pebbledash pediments and finials, dentiled porch with carved brackets, canted brick quoins, and heavily molded facade entryway surround make this Queen Anne a noteworthy example of its building type. The house is distinctive when compared to the houses in the immediate vicinity and compared to those found in nearby historic districts. As a result, the Dr. Hubert Royster House was determined eligible for listing in the NRHP individually under Criteria B and C in 2020.

Figure 14.  
Dr. Hubert Royster House (WA3750), May 2020, Facing Northeast





The NRHP boundary for the Dr. Hubert Royster House encompasses the entire 0.36-acre parcel at 131 Boylan Avenue. The boundaries follow the existing parcel lines, and there are no additional visible buildings or objects on the parcel (Figure 15). The period of significance extends from 1902 to 1931. The HPO concurred with these boundaries and eligibility recommendation in a letter dated August 21, 2020 (Appendix A).

#### SECTION 106 ASSESSMENT OF EFFECT

The RUS Bus Development would be situated approximately 480 feet southeast of the Dr. Hubert Royster House (Figure 16). The dwelling is located on the east side of Boylan Avenue at the edge of a residential node roughly bounded to the south and east by rail lines. Though the skyline of the Raleigh Central Business District is visible from the dwelling's rear parcel line, a cluster of mid-twentieth-century industrial buildings and rail spurs form a distinct boundary between the dwelling and the Depot Historic District and Central Business District. The dwelling's setting features modern transportation-related infrastructure including bus stops, signal poles, and parking signage (Figure 17).

The project would not require the acquisition of permanent or temporary ROW from the NRHP boundary of the Dr. Hubert Royster House and all project construction would be located approximately 480 feet east of the resource. The project would have no direct effect to the dwelling and would not alter any elements that make it eligible for listing in the NRHP. The Dr. Hubert Royster House is located just east of the Raleigh city center and 20-plus-story buildings are within the dwelling's viewshed (Figure 18). Since the resource's determination of eligibility in 2020, the dwelling has been bounded by a diverse collection of buildings including a mid-twentieth-century commercial building to the south and warehouses to the east. Furthermore, the dwelling's viewshed does not contribute to its eligibility for listing in the NRHP. The addition of the RUS Bus Development would not diminish the integrity of the historic resource's setting, materials, design, location, workmanship, feeling, and association.

#### *Direct Effects*

The project would construct the 27-story RUS Bus Development and bus boarding zones approximately 480 feet (0.09-mile) east of the Dr. Huber Royster House. The proposed project would occupy an entire city block bounded by West Hargett Street to the north, South West Street to the east, West Martin Street to the south, and the former Seaboard Air Line and Norfolk Southern rail lines to the west. No project construction would occur within or directly adjacent to the NRHP boundary of the dwelling. The proposed project would have no direct effect to the Dr. Hubert Royster House under this criterion.

Figure 15.  
NRHP Boundaries of the Dr. Hubert Royster House (WA3750)



Basemap: Raleigh 2019 Orthophotos

Figure 16.  
Dr. Hubert Royster House in Relation to the Proposed RUS Bus Development

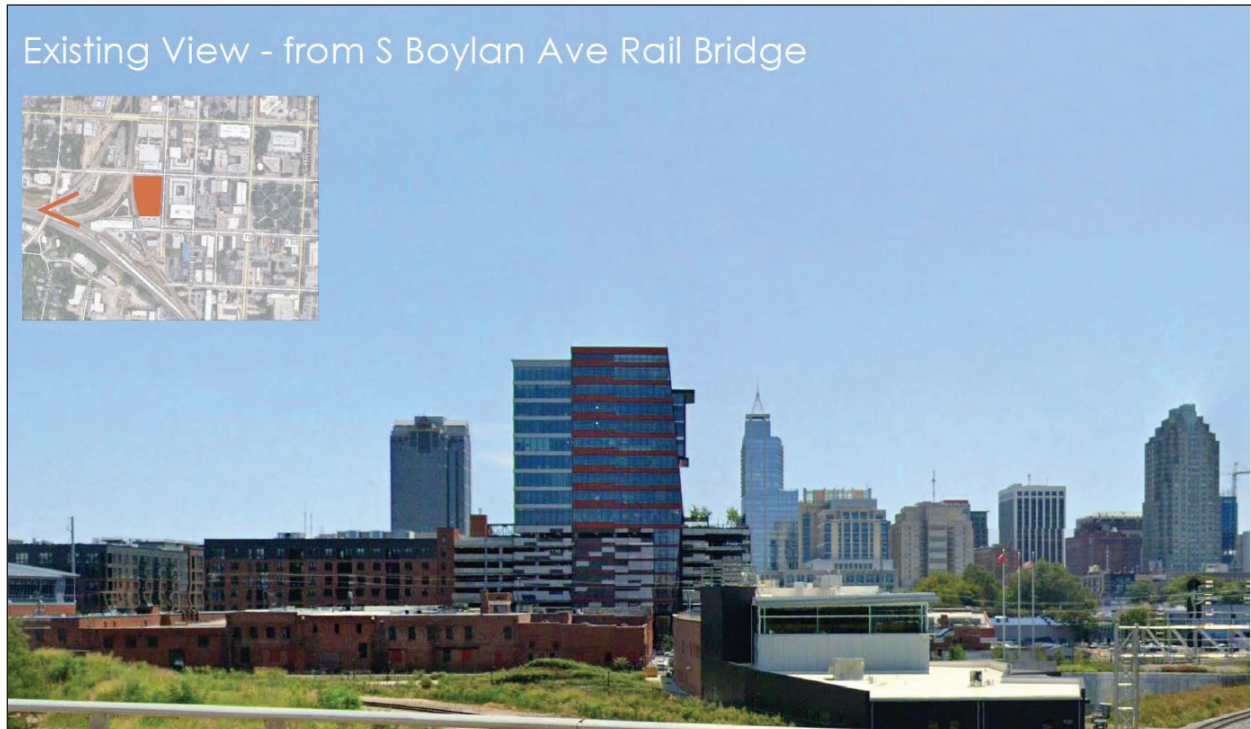


Basemap: Raleigh 2019 Orthophotos



Figure 17.  
View East to the Proposed RUS Bus Development, April 2019

Figure 18.  
Proposed RUS Bus Development from West of Downtown, Conceptual Rendering,  
Hoffman & Associates



A. Current View Toward the Proposed Development from Commerce Place and West Davie Street, May 2020



B. Proposed View to the Proposed Development from Commerce Place and West Davie Street, May 2020

### *Use*

The project would have no direct effect on the use of the Dr. Hubert Royster House. All construction would take place outside of the resource's NRHP boundary.

### *Physical Features*

The proposed project does not require the acquisition of a ROW nor temporary or permanent easements from the Dr. Hubert Royster House. The project would not remove any of the dwelling's character-defining architectural features or association with Dr. Hubert Royster.

### *Visual*

The proposed RUS Bus Development is a 27-story, mixed-use building that is not out of character for the area east of the Dr. Hubert Royster House. The resource is currently bounded to the east by an historically industrial corridor featuring rail lines and mid-twentieth century warehouses. The skyline of the Raleigh Central Business District is visible to the east and 10 to 20-story condominiums and office buildings have been extant to the east since 2016. The addition of another mixed-use, multi-story building would not impose a significant visual effect to the setting of the Dr. Hubert Royster House. Furthermore, the dwelling's viewshed does not contribute to its eligibility for listing in the NRHP. The proposed project would have no adverse effect on the viewshed of the Dr. Hubert Royster House.

### *Atmospheric and Noise*

The RUS Bus Development would be utilized by residents, employees, hotel patrons, and pedestrians. These uses are in keeping with the surrounding developments that include residential, commercial, and office facilities. The development would not introduce significant audible or atmospheric impacts that are out of character. The rail lines that currently divide the parcel from the warehouse house district would remain in place. The introduction of the RUS Bus Development is in keeping with the surrounding urban fabric and would not introduce atmospheric and audible elements that are out of character.

### *Indirect and Cumulative Effects*

The proposed project would convert a block of long vacant industrial buildings approximately 480 feet (0.09-mile) east of the Dr. Huber Royster House to a mixed-use transportation facility that constitutes Phase II of the Raleigh Union Station development in this node of urban Raleigh. Project implementation is not anticipated to have adverse indirect effects to the Dr. Hubert Royster House. No project construction would take place within the NRHP boundary and the project would

not introduce a new access or a new use. While the project may indirectly increase congestion on adjacent roads due to the higher number and frequency of local and regional buses entering and exiting the transit facility, the need for on-street parking may decrease with the addition of the project's parking garage. The increased development may indirectly induce growth in the surrounding residential neighborhoods, including around the Dr. Hubert Royster House. However, the residential areas surrounding downtown Raleigh have already begun to experience growth associated with a growing urban area; therefore, any growth induced by the project would be minor and consistent with current development trends.

According to the *2030 Comprehensive Plan* and *Future Land Use Map*, the Dr. Hubert Royster House and the area abutting the property to the north, south, and east is within Raleigh's Central Business District and is presently zoned "Downtown Mixed Use – Urban Limited" with variations in building height allowances ranging from three to 12 stories. "Urban Limited" frontage is applied in areas where parking is prohibited between the building and the street. This zoning designation dictates that street-facing entrances are required every 75 feet to encourage walkability and engagement with the streetscape. These zoning measures aid in preserving the resource's historic feel and pedestrian-oriented design. A change to the dwelling's current zoning is not proposed as part of the project. Continued use of the house as a multi-family residential property appears likely.

The project is not expected to result in substantial impacts to the area within or directly adjacent to the NRHP Boundary of the Dr. Hubert Royster House. Considering the context and intensity of impacts associated with the project and the incremental cumulative impacts, the proposed project would not result in adverse indirect or cumulative effects to the Dr. Hubert Royster House.

#### SECTION 4(F) EVALUATION

The proposed project would not require the acquisition of a new ROW nor temporary or permanent easements from the NRHP boundary of the Dr. Huber Royster House. The project would convert a block of vacant industrial buildings to an eight-bay bus transfer facility with an adjoining mixed-use development featuring mixed-income housing, a hotel, office and retail space. The transportation development would not impair any activities, features, or attributes that qualify the Dr. Hubert Royster House for listing in the NRHP. Therefore, the proposed project does not constitute a Section 4(f) use of the Dr. Hubert Royster House.

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## VII. CONCLUSION

New South Associates (New South) prepared this assessment of effects for the proposed Research Triangle Regional Public Transportation (dba GoTriangle) Phase II Raleigh Union Station (RUS) Bus Station Development in downtown Raleigh, Wake County, North Carolina. The prime consultant, WSP, is under contract with GoTriangle. The project is funded by the FTA which subjects it to the requirements of NEPA and Section 106 of the NHPA, as amended. The proposed project, termed RUS Bus, would construct a facility on three parcels (totaling approximately 1.72 acres) owned by GoTriangle at 200 South West Street, 206 South West Street, and 210 South West Street.

In consultation with the HPO, New South applied the Criteria of Effect as codified in 36 CFR 800.5 in compliance with Section 106 of the NHPA to assess the impacts of the proposed project on the NRHP-listed and eligible resources in the APE. As a result of this assessment, FTA determined that the proposed project would have **no adverse effect** on the NRHP-listed and eligible properties in the APE. No resources were determined to have a potential Section 4(f) use.

This report was prepared in conjunction with the local government, GoTriangle, FTA, and HPO.

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# REFERENCES CITED

Alexander, Francis and Richard Mattson

- 2017 Depot Historic District Boundary Increase National Register of Historic Places Nomination Form. National Park Service. Raleigh, North Carolina

Carroll, Grady Lee Ernest

- 1994 Royster, Hubert Ashley. Educational. *NCPedia*. Electronic document, <https://www.ncpedia.org/biography/royster-hubert-ashley>, accessed June 10, 2020.

City of Raleigh

- 2019 City of Raleigh Future Land Use. City of Raleigh. Raleigh, North Carolina.

GoTriangle

- 2019 Raleigh Council Vote Means GoTriangle Can Proceed with Transformational Downtown Project. *GoTriangle News*, October. Raleigh, North Carolina.

Little, M. Ruth

- 2002 Depot Historic District National Register of Historic Places Nomination Form. National Park Service. Raleigh, North Carolina.

McGregor, Deborah Kuhn

- 1998 *From Midwives to Medicine, The Birth of American Gynecology*. Rutgers University Press, New Brunswick, New Jersey.

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# APPENDIX A: CORRESPONDENCE

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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

August 21, 2020

Dr. Yvette Taylor  
Regional Administrator  
Federal Transit Administration  
% Carrie Walker

[Julia.walker@dot.gov](mailto:Julia.walker@dot.gov)

RE: Proposed new transit facility located at 200 South West Street, 206 South West Street, and 210 South West Street, Raleigh, Wake County, ER 20-0299

Dear Dr. Taylor:

Thank you for your July 21, 2020, letter transmitting the Historic Architecture Survey Report, regarding the Raleigh Union Station, Phase II-RUS Bus Project, we concur with the report's findings for the reasons cited in the report.

The Depot Historic District (WA0724) and the Depot Historic District Boundary Increase (WA7774) retain eligibility for the National Register.

The Depot Historic District Expansion (WA6524) does not retain eligibility for the National Register.

The Dr. Hubert Royster House (WA3750) is eligible for the National Register.

The following resources are determined not eligible for the National Register:

- William Gibson Building (WA3007)
- James C. Green Realty and Insurance Building (WA4250)
- Office Building (WA6519)
- Northwestern Mutual Fire Association Office (WA6523)
- W.J. Hines Company Warehouse (WA7405)
- W.J. Hines Company Warehouse 2 (WA7406)
- Warren Brother's Transfer Warehouse (WA7407)
- EDS Equipment Design and Services Building (WA7411)
- U.S. National Youth Administration Warehouse (WA7412)
- Nash Square Fire Station (WA8078), is a contributing resource to the Depot Historic District
- City of Raleigh Offices (WA8312)
- Service Station (WA8313)
- Commercial Building (WA8314)
- Royal Typewriter Company Building (WA8315)

The report lacks a summary table listing each evaluated resource and their recommended eligibility status, but the report is thorough and well-written. Also note that the table on page 74 lists the Royster House as eligible under criteria A and C, but the report determined that the house was eligible under criteria B and C.

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,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".

 Ramona Bartos,  
Deputy State Historic Preservation Officer