



To protect and preserve the irreplaceable historic resources
of Wilmington and the Lower Cape Fear Region

March 9, 2022

Amanda Murphy, Deputy FPO
Federal Railroad Administration
1200 New Jersey Avenue Southeast
Washington, NC 2003

Dear Ms. Murphy:

The Historic Wilmington Foundation (HWF) greatly appreciates its continued participation as a consulting party to the Section 106 review for the Wilmington Rail Realignment. HWF commends the work of Mr. Marvin Brown in developing the Wilmington Rail Realignment Intensive-Level Historic Architectural Survey. HWF agrees with Mr. Brown's conclusion that the former Holy Church of Jesus Christ (NH2591) at 216 Marstellar Street is eligible for the National Register of Historic Places under Criterion C and that the resource meets the requirements of Criterion Consideration A. HWF is disappointed with Mr. Brown's conclusion that resources within the APE but currently outside the Wilmington Historic District are ineligible for a potential expansion of the historic district due to a continued loss of integrity. We respectfully request that Mr. Brown re-evaluate whether there is a concentration of enough potentially contributing resources that warrant a smaller potential expansion of the Wilmington Historic District. Specifically, HWF questions whether the 100 block of Meares Street, containing five potentially contributing resources may represent an opportunity for a smaller potential expansion area.

Additionally, the HWF respectfully requests that Greenfield Lake Park and Gardens (NH1381) be re-evaluated for eligibility on the National Register of Historic Places under Criteria A and C. For comparison, Wallace Park is listed as a contributing resource in the Brookwood Historic District. Greenfield is a designed, historic landscape designated as a local landmark in 2011 by the City of Wilmington. The park and gardens retain significance in the areas of agriculture, conservation, entertainment/recreation, landscape architecture, and social history. The site is the location of a colonial rice plantation owned by Dr. Samuel Green. Furthermore, Greenfield highlights the early-20th century historic trends of the City Beautiful Movement and increased political participation of women. North Carolina Sorosis (the first federated woman's club in North Carolina) successfully advocated for the City of Wilmington to purchase the site for use as a recreational park in 1925. Finally, Greenfield's gardens exemplify the Works Project Administration's contributions in the development of Wilmington. The WPA beautified the park by planting azaleas and constructing a paved driveway. This work led to the establishment of the North Carolina Azalea Festival in 1948. Greenfield Lake Park and Gardens retains its integrity since the designed, historic landscape is relatively unaltered from its creation by the WPA. As a

public park, Greenfield is protected by Section 4(f) of the U.S. Department of Transportation Act of 1966.

Regarding effects assessment methodology, HWF calls attention to potential adverse effects to the c. 1910 Bear-Sol Winery Building (NH3676) due the close proximity of this resource to the preferred alternative. The Bear-Sol Winery Building is a contributing resource in the Wilmington Historic District 2003 Boundary Increase. This resource is explicitly mentioned in the 2003 boundary expansion application as the “best example” of industrial buildings that “contribute to the overall significance of the area.” Adverse effects to the Bear-Sol Winery Building’s design, materials, and workmanship due to damaging or destructive vibrations from the preferred alternative must be assessed per 36 CFR § 800.5. Assessment of adverse effects to this contributing resource is of the utmost importance to HWF since adverse effects to the Bear-Sol Winery Building will contribute to the continued deterioration of the Wilmington Historic District’s integrity in this neighborhood.

Furthermore, HWF calls attention to the introduction of visual and audible elements that may diminish the integrity of the *USS North Carolina* (NH0004), a National Historic Landmark. HWF eagerly anticipates the receipt of visualization “KVP 4” to assess potential adverse effects to the Battleship’s setting. As a memorial to the over 11,000 North Carolinians who made the ultimate sacrifice defending their country in the Second World War, it is important that the Battleship’s setting invoke reverence and reflection.

HWF accepts the conclusion that terrestrial archaeological sites 31NH686 and 31NH895 are ineligible for the National Register of Historic Places. However, since 31NH895 was previously unrecorded by the Office of State Archaeology, recently identified, and relatively accessible, HWF strongly recommends that stakeholders contact the Public Archaeology Corps, a local 501(c)(3) non-profit organization, to discuss further exploration of the site before rail realignment causes further disturbance. Mr. Jonathan Schleier is the Executive Director of the Public Archaeology Corps and may be contacted at j.schleier@publicarchaeologycorps.org.

In conclusion, HWF looks forward to reviewing the assessment of effects on cultural resources as the Section 106 process continues. Should there be any questions regarding this letter, please do not hesitate to contact me at 910-620-2379 or gilbert@historicwilmington.org.

Respectfully,



Travis Gilbert, Executive Director, Historic Wilmington Foundation
CC: Historic Wilmington Foundation Board of Trustees