

TENNESSEE DEPARTMENT OF TRANSPORTATION

**HISTORICAL/ARCHITECTURAL ASSESSMENT
AND DOCUMENTATION OF EFFECT REPORT
PURSUANT TO 36 CFR 800**

**FOR
PROPOSED IMPROVEMENTS TO
STATE ROUTE 28 (U.S. 127) FROM STATE ROUTE 68
TO CLEVELAND STREET IN CROSSVILLE**

CUMBERLAND COUNTY



November 2005

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MANAGEMENT SUMMARY

The Tennessee Department of Transportation (TDOT) is proposing to improve State Route 28 (U.S. 127) from State Route 68 to Cleveland Street in Crossville in Cumberland County, Tennessee. The proposed project begins north of State Route 68 and State Route 28 intersection to Cleveland Street in Crossville. The proposed typical section will consist of four traffic lanes, a continuous turn lane, shoulders with curb-and-gutter and utility strips within a 104-foot right-of-way.

Historians from the Tennessee Department of Transportation (TDOT) identified one property within the area of potential effect (APE) that is listed in the National Register of Historic Places: Cumberland Homesteads Historic District.

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- A. Fact Sheet on Section 106
- B. National Register Criteria, 36 CFR 60.4
- C. Criteria of Effect, 36 CFR 800.5
- D. Public Participation
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STATEMENT OF DETERMINATION

The Tennessee Department of Transportation (TDOT) with state funding is proposing improvements to State Route 28 (U.S. 127) from State Route 68 to Cleveland Street in Crossville.

Federal laws require TDOT and federal permitting agencies to comply with Section 106 of the National Historic Preservation Act of 1966, as amended. Appendix A contains a fact sheet about Section 106. Regulations detailing the implementation of this act are codified at 36 CFR 800. This legislation requires TDOT and federal agencies identify any properties (either above-ground buildings, structures, objects, or historic sites or below ground archaeological sites) of historic significance. For the purposes of this legislation, historic significance is defined as those properties which are included in the National Register of Historic Places or which are eligible for inclusion in the National Register. Appendix B contains a copy of the National Register criteria, which are codified at 36 CFR 60.4. Once historic resources are identified, legislation requires these agencies to determine if the proposed project would affect the historic resource. Appendix C contains a copy of the Criteria of Effect as defined in 36 CFR 800.5. If the proposed project would have an adverse effect to a historic property, the legislation requires the lead federal permitting agency to provide the Advisory Council on Historic Preservation (an independent federal agency) an opportunity to comment on the effect.

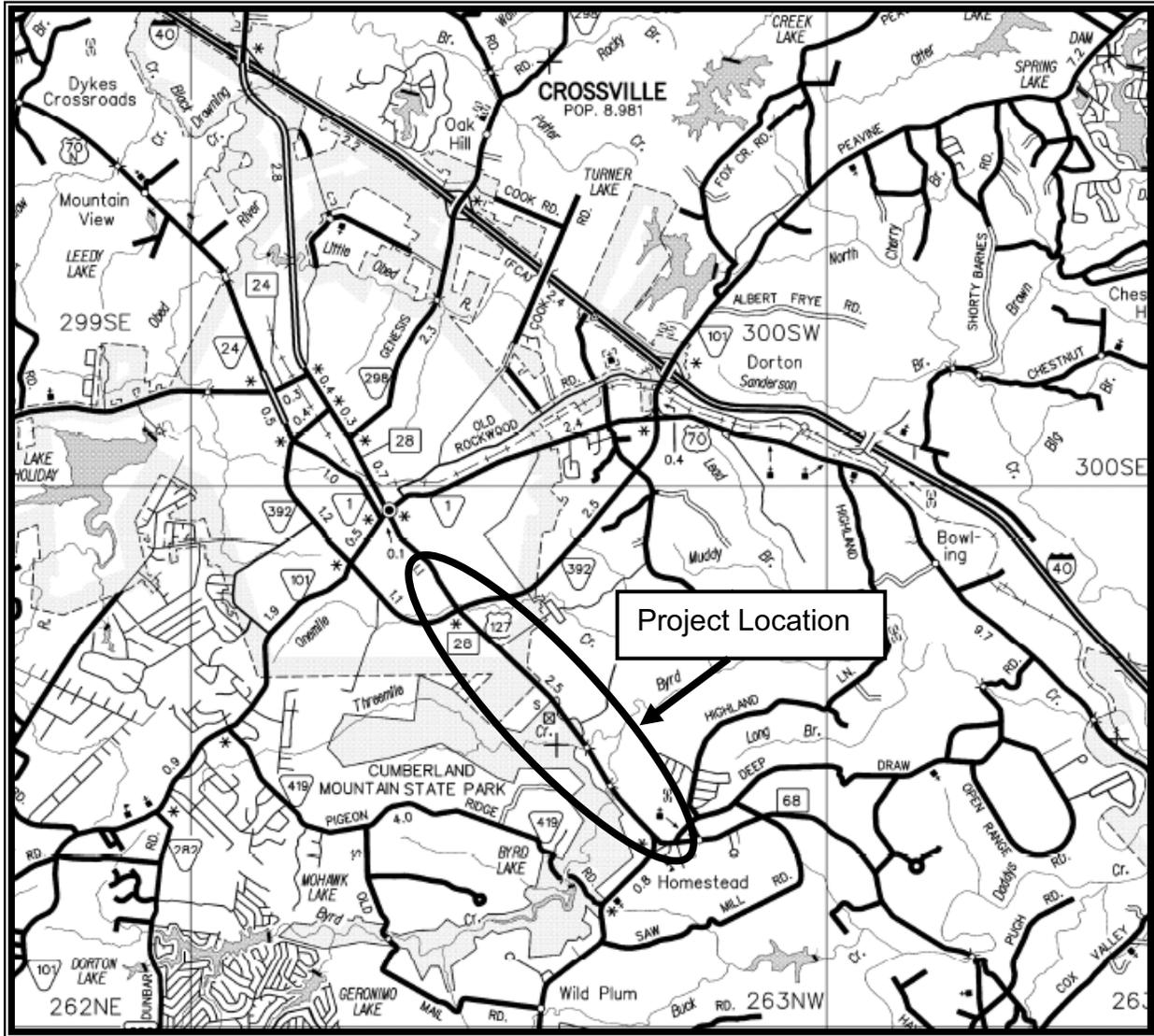
Pursuant to 36 CFR 800.4 which requires TDOT and federal permitting agencies to identify historic resources near its proposed projects, architectural historians from TDOT surveyed the area of potential environmental impact for the proposed project in an effort to identify any National Register included or eligible properties. TDOT historians identified one property that was listed in the National Register of Historic Places: Cumberland Homesteads Historic District.

The archaeological assessment is contained in a separate document. This document has been prepared in consultation with the TN-SHPO and will be circulated to the TN-SHPO and local historians.

Figure One: Project Location Map

Proposed Improvements to State Route 28 (U.S. 127) from State Route 68 to Cleveland Street in Crossville, Cumberland County

Quad Maps: Crossville 109 NE
Dorton 117 NW



PROJECT DESCRIPTION

The Tennessee Department of Transportation (TDOT) is proposing to improve State Route 28 (U.S. 127) from State Route 68 to East Cleveland Street in Crossville.

The proposed project begins near the State Route 68 and State Route 28 intersection and extends to Cleveland Street in Crossville. The proposed typical section will consist of four traffic lanes, a continuous turn lane, shoulders with curb-and-gutter and utility strips within a 104-foot right-of-way. A 45 mph design speed is proposed. From Wells Road to Cleveland Street in Crossville it is proposed to drop the shoulders, thus requiring 84-feet of right-of-way. Due to the beginning of the commercial development south of Crossville, it was determined that the additional width required for shoulders would be detrimental to the adjacent properties. A 40 mph design speed is proposed at the State Route 392 intersection, however, signal warrants will need to be determined after design traffic is available. It is proposed to use the existing vertical and horizontal alignments. The proposed typical section will follow the existing alignment with mostly a symmetrical widening.

This project was part of the 1986 Better Roads Program and originally included widening from the State Route 28/State Route 68 intersection to Saw Mill Road. In 2002, this project became one of the 15 projects that the University of Tennessee Center for Transportation Research studied to determine if these projects as proposed were necessary. Due to the findings of the UT study, the proposed project was modified to better reflect the needs of local residents and the motoring public. The section of the roadway from the State Route 28/State Route 68 intersection to Saw Mill Road was eliminated, leaving the project to end near the State Route 28/State Route 68 intersection. Also as a result of the UT study, it was determined that the need and purpose for the project from Cleveland Street to State Route 68 was warranted; however, Commissioner Nicely implemented a new program where the local officials and citizens would be consulted about design modifications.

The design modification TDOT focused on was the layout of the intersection at State Route 28 and State Route 68. The triangle intersection was designed in the 1930s when Cumberland Homesteads was first created and, according to TDOT information, no longer functions safely or efficiently. In conjunction with a Citizens Resource Team (CRT), TDOT worked to develop an alternative intersection layout that would be safe for the motoring public while better fitting into the Cumberland Homesteads Historic District. The CRT began meeting in 2004 with the goal of recommending “an alternative to the U.S. 127 (SR28)-SR68 intersection design that is safe, efficient, more compatible with the Cumberland Homesteads Historic District and less intrusive to the existing natural and man made environment.” Nineteen elected officials and local residents represented different interests that would be affected by the proposed intersection

improvements. After careful review and several alternatives, the CRT recommended Alternative D-modified (the other alternatives will be described in the Discussion of Effects Section of this Document) which included the following modifications.

- State Route 68 intersects with State Route 28 (U.S. 127) at 90 degrees to tangent of the curve on State Route 28
- State Route 68 westbound will be free flowing and will become a second lane to State Route 28 northbound
- State Route 28 southbound will have one left turn lane to State Route 68 eastbound
- State Route 28 northbound right lane will become a right turn lane to eastbound State Route 68 and the lane will drop at the intersection
- The triangle will be rehabilitated to approximately the current condition with landscaping typical of the 1930s Cumberland Plateau
- Shoulder paving will be reduced to minimize the apparent footprint
- Continue to preserve the triangle and minimize the pavement footprint wherever possible

In addition to the design modifications, the CRT recommended that TDOT work with a local bank that was building a branch office within the Cumberland Homesteads Historic District which would result in the demolition of one of the Homestead Houses. TDOT agreed to work with citizens and bank officials to relocate the house, however, the bank's construction schedule did not coincide with TDOT's relocation schedule and resulted in the demolition of the house before TDOT could relocate it. The CRT also recommended that an "Enhancement Committee" be established to "coordinate historic, aesthetic, and landscape treatments for the project." As of March 2006, the project manager is working with CRT members and local officials to form a smaller committee than the original CRT to address these issues.

Of the 19 members of the CRT, 12 members (six either refused to sign or had stopped attending meetings and one member passed away) signed the CRT recommendations which were given to Commissioner Nicely for a final decision in the summer of 2005.



Resource Team Members

J.H. Graham
Mayor, City of Crossville

Richard Campbell
City of Crossville

Gary Hood
Hood Funeral Home

Meredith Mullen
Cumberland Mountain State Park

Steve Bosland
Citizen Member

Vicki Matthews
Cumberland Homesteads Tower Assoc.

Nita M. Boring
President, Cumberland County
Historic Society

Conrad Welch
Cumberland Medical Center

Thomas Looney
Citizen Member

Joe Crump
Citizen Member

Claudette Stager
SHPO

Doug Little
Homestead Methodist Church

Helen Inman
Cumberland Homesteads Tower Assoc.

Project Managers TDOT:
Ann Andrews
Ralph Barnes

John Walton
Averitt Express

Charlotte Stevens
Charlotte's Interiors

John Marvin
Citizen Member

Shirley Parris
Cumberland County
Schools

Carl Olsen
US Army COE

Harold Draper
TVA

Palmer Engineering:
Lindsey Briggs
Jayne Fiegel, Historian

Figure Two: Signature Sheet from the CRT Recommendations. Out of 19 citizen members, 12 (six either refused to sign or had stopped attending meetings and one member passed away signed the document recommending Alternative D-modified as the preferred alternative for the State Route 28/State Route 68 intersection in the Cumberland Homestead Historic District.

Project History

The proposed project was part of the 1986 Better Roads Program initiated by the Tennessee Legislature that used funds from the state gas tax to implement road improvements.

1994

In September 1994, TDOT staff field reviewed this project with staff from the Tennessee State Historic Preservation Office (TN-SHPO). At that time, the TN-SHPO was comfortable with the proposed five-lane, as opposed to a divided four-lane, because it took substantially less right-of-way. However, there were three key issues that were discussed:

- TN-SHPO requested that TDOT modify a specific curve to minimize harm to a house. TDOT did.
- Dual, triangular entrance to state park: TDOT agreed to keep this.
- Modifying the design at the Cumberland Homesteads Tower to maintain parking and minimize impacts: TDOT implemented the design changes that the TN-SHPO requested.

TDOT historians worked with the Design Division to ensure that the TN-SHPO's concerns were addressed. In a memo dated 27 September 1994, Mr. Harris Scott III informed Raymond Brisson, Director of the Environmental Planning and Permitting Division, that TDOT had worked to mitigate the most damaging impacts concerning the TN-SHPO.

- The original design encroached on one of the Homestead Houses. The new design revised by sharpening a curve to provide a symmetrical widening, reducing the right-of-way take from a contributing feature of the district by 15,000 square feet.
- The design was modified to preserve the historic triangle entrance to Cumberland Mountain State Park.
- The reconfiguration of the intersection at the Cumberland Homesteads Tower did provide the museum with additional parking spaces. In addition, a landscaped buffer between the ramp and museum would be incorporated into the plans.

In a letter dated 5 October 1994, the TN-SHPO issued a preliminary statement that concurred with TDOT's findings that the proposed project would adversely impact the National Register listed Cumberland Homesteads Historic District. The letter stated, *"Based on available information, we find that the project as currently proposed will adversely affect the . . .property. . . . In rendering this finding, this office is aware of the changes to the proposed project which your*

agency has already made to lessen substantially the impact of this project upon cultural resources.”

1996

On 3 June 1996, according to regulations set forth in Public Law 699, a state-level report was prepared by TDOT historians, identifying one National Register listed historic district: the Cumberland Homesteads Historic District. The report was circulated to the Tennessee Historical Commission and the public. In a letter dated, 6 June 1996, the TN-SHPO concurred with TDOT’s opinion that the proposed road project in its entirety would have an adverse effect to the historic district. The letter stated, *“We concur that your agency has designed the project in such a manner as to minimize this adverse effect.”*

In a letter dated 10 June 1996, Mr. Brock Hill, Cumberland County Mayor and consulting party in the historic review process, agreed with TDOT’s findings and supported TDOT’s design modification to retain the Y-intersection at the state park and said that TDOT’s “care taken to preserve” the intersection was “appreciated.” Mr. Hill’s comments were generally favorable, stating concern for the setting was minimal due to existing high traffic levels and that no historic buildings would be demolished, noting *“Care is being taken by TN-DOT to minimize impact on the district.”* However, he did request that TDOT consider retaining the Y-intersection at Saw Mill Road as it had at the park. In the same letter, Mr. Hill also requested a bike trail along the road.

On 17 June 1996, Martha Carver sent a memorandum to Paul Morrison, TDOT Survey and Design, requesting that TDOT evaluate Mayor Hill’s requests.

In a letter dated 20 August 1996, G. Donald Brookhart, the county historian, reiterated the county mayor’s request for a bike trail but added a request for a tunnel under SR28.

On 23 August 1996, Martha Carver, TDOT’s Historic Preservation Supervisor, forwarded Paul Morrison in Survey and Design the county historian’s request for a bike path and a tunnel under State Route 28.

1997

In a letter dated 9 July 1997, the TN-SHPO agreed with TDOT’s findings that there are no archaeological resources being affected by the proposed project.

1999

In October 1999 the Board of the Cumberland Homesteads Tower Association, Inc. mailed a letter to Ralph Comer, Director of TDOT’s Planning Division. The letter stated their general displeasure with the proposed project visually

impacting *“our rural, historic farm community.”* Their letter included several suggestions.

- *“Extension of the current right hand lane on Hwy. 127S (approaching Hwy 68 junction), past it’s present merge to become a Hwy. 127S Right Turn Only Lane (left lane would continue ahead to Hwy. 68S)”*
- *“Add center turn lane on Hwy. 68 from the junction of Hwy. 127 to the entrance of Deep Draw Rd.”*
- *“Add Traffic Signal Light at the intersection of Hwy 127 and Hwy 68 as current plan provides”*
- *“Match construction to existing roadways (no curbs, gutters, or sidewalks)”*
- *“Reduce speed limit (45 mph) throughout the entire Historic District except in school zone where appropriate limits already exist.”*
- *“Add limited center turn lanes at congested areas such as the Homestead Elementary School, Cumberland Mountain State Park Entrance, entrances to sub-divisions, etc...This effective system was used this past year at strategic locations between Crossville and Homesteads Tower on Hwy 127 and has worked great! Construction of these turn lanes was done in a matter of days with very minimum disruption and surely much less cost to the taxpayers.”*

On 27 October 1999, Ralph Comer responded to the Cumberland Homesteads Tower Museum Board and forwarded their suggestions and concerns to the Bureau of Planning & Development, the Environmental Planning and Permitting Division, the Design Division, the Transportation Planning Office, and the Historic Preservation Office.

In a letter dated 21 December 1999, Mr. Clyde Pedigo wrote to Martha Carver and enclosed a previous letter he mailed to John Reinbold, a TDOT attorney. He stated his displeasure for the proposed project and that it would harm the intersection near the Homestead Tower. In addition he stated that *“There is just not enough traffic to require that much highway!!!”*

2000

On 25 January 2000, Martha Carver responded to Mr. Pedigo’s letter and explained that a five-lane urban roadway rather than a four-lane divided highway would take substantially less right-of-way from the historic district and that TDOT’s twenty-year traffic projections indicated a need for the proposed project.

Throughout 2000, TDOT historians worked with the Design Division to modify the design to lessen the adverse impacts to the historic district. One of the design

enhancements being discussed was the use of unobtrusive sidewalks that would blend with the historic district including depressed sidewalks with natural coloring.

2002

On 27 March 2002, Martha Carver received a phone call from Vicki Matthews requesting a copy of the 1996 Historic Report. A copy of the report was mailed to Ms. Matthews.

On 3 May 2002, Mary Mastin, an attorney for the Cumberland Homesteads Tower Association, called Martha Carver with questions about the project. She asked why the project was state-funded rather than federally funded and stated that she was thinking about taking TDOT to court over the project. Ms. Carver asked Ms. Mastin what her clients wanted from this process since they had requested many things over the years. Ms. Mastin said that she believed that the intersection at the Tower was their main objection; however, she could not give specific design issues about the tower or suggest specific mitigation measures.

On 26 October 2002, Mary Mastin, an attorney for the Cumberland Homesteads Tower Association, wrote a letter to TDOT Commissioner Bruce Saltsman informing him that proceeding with the project given the adverse impacts to the district, could result in federal court action. Ms. Mastin also requested that TDOT stop purchasing right-of-way from property owners and further stated that they *“can be successful in obtaining preliminary injunctive relief in federal court to stop this project.”* Ms. Mastin asked for a schedule of work for the project and requested a meeting with the project manager before any work continued.

On 31 October 2002, Commissioner Saltsman responded to Ms. Mastin’s letter stating that the project was part of the 1986 Better Roads Program and that TDOT intended to proceed with right-of-way acquisition.

In a letter dated 14 December 2002, Vicki Matthews, a representative of the Cumberland Homesteads Tower Association, wrote a letter to then governor-elect Phil Bredesen requesting that he stop the proposed State Route 28 project due to the impacts to the historic district. Their concerns included

- Destruction of key historic elements of the district including the redesign of two triangles that were part of the original design for the Homestead.
- Introduction of “Historically Incorrect” roadway elements like the five-lane curb and gutter design.
- Highway plans that exceed current and future traffic needs
- Lack of public support for the proposed plans

2003

On 10 January 2003, Mary Mastin sent a letter similar to the one she sent to Commissioner Saltsman in October 2002 requesting that all work on the proposed project be stopped. She again asked to have a meeting with Commissioner Nicely and the project manager to discuss their issues.

In a 20 January 2003 letter, Patrick McIntyre, Executive Director of the Tennessee Preservation Trust, requested that TDOT re-examine the proposed project to minimize effects to the historic district.

On 25 January 2003, Mary Mastin again requested a meeting with Commissioner Nicely to discuss the historic impacts of the project and that all work on the project should stop until after a meeting had been held.

On 2 February 2003, Commissioner Nicely agreed that a meeting to discuss the project should take place. He advised that they set up the meeting with Jeff Jones, Director of the Design Division, and include Martha Carver, TDOT historian, to discuss design issues.

In a 6 February 2003 letter, the National Trust for Historic Preservation stated that they did not think that TDOT had thoroughly studied all prudent and feasible alternatives that are required under Section 4(f) of the U.S. DOT Act of 1966. The letter also stated that the size of the roadway exceeded present and future traffic needs and introduced a roadway incompatible with the historic district. In addition, the National Trust requested that they be considered an official consulting party in the Section 106 process.

On 18 February 2003, Martha Carver responded to the National Trust's letter by describing in detail TDOT's efforts to design the project to comply with the TN-SHPO's requests and to minimize harm to the historic district. In addition, Ms. Carver pointed out that the proposed project was part of the 1986 Better Roads Act paid for with only state funds. She pointed out that Section 4(f) of the U.S. DOT Act of 1966 hinges on federal funding or permitting through the U.S. Department of Transportation which would not be applicable to this project due to its funding sources.

On 21 February 2003, a meeting was held in the Polk Building in Nashville with representatives from TDOT and the Cumberland Homestead Tower Association in attendance. Participants included from TDOT, Jeff Jones, Jim Bryson, Dave Davis, Martha Carver, and Tammy Allison and from the Homesteads Mary Mastin, Nancy Tinker, Vicki Matthews, Emma Vaden, Helen Inman, and Greg Ingram. Jeff Jones summarized the project and the public meeting comments from previous years. Mary Mastin requested that the right-of-way process be stopped and that if it was not stopped she would inform Commissioner Nicely. Jeff Jones responded that he would check with the Right-of-way Division about

the project. Mary Mastin asked about the UT Study and questioned the need for this project citing the State Route 101 project as sufficient since both roads go to the same place. Mastin asked about the triangle at the Tower Museum. Dave Davis asked what she wanted. She replied that the triangle should be preserved as it is and just add a lane to the west. TDOT designers stated that the triangle was unsafe and that the addition of lanes would add to the problems. Vicki Matthews stated that there were no accidents on the triangle (possibly one in the last five years). The Cumberland Homesteads representatives continued to state that the project was introducing an urban road in a rural area and that they did not see a need for the project. TDOT representatives agreed to check on ten items that the group had questions about.

1. Basic need for the project.
2. Accident rates at the triangle
3. Were Right-of-way Acquisitions already underway
4. Termini that is inconsistent with the 1986 project
5. Changes in the parking area of the Tower Museum
6. The possibility of building a roundabout in place of the triangle
7. UT Assessment process
8. Requested signs at the interstate
9. Likelihood of funding
10. Possibility of doing press releases about the project

On 25 February 2003, Mary Mastin wrote a follow-up letter to Commissioner Nicely regarding the 21 February meeting. She summarized the three main questions the group left the meeting with. They were

1. Would TDOT consider changing the funding on the project in order to accommodate the governor's request for departmental cuts?
2. How do factors like the UT study and the budget situation affect the project letting?
3. How could her group have input into the UT study?

Also on 25 February 2003, Mary Mastin sent a follow-up letter to Jeff Jones, Director of the Design Division, asking him to clarify several basic issues. These issues were the same as the ten issues TDOT staff agreed to verify during the meeting.

On 28 February 2003, TDOT historians mailed a packet of information to the U.S. Army Corps of Engineers requesting that they define the Area of Potential Effect for the proposed project under Section 106 since their agency was required to issue permits for TDOT to replace two bridges and infill one wetland on State Route 28. The letter also requested that the Corps, as the lead federal agency for the proposed project, formally initiate the Section 106 process.

In a letter dated 11 March 2003, TDOT historians sent a packet of information to the Tennessee Valley Authority asking them to define the Area of Potential Effect for their permitting areas.

On 21 March 2003 TDOT hosted a meeting for interested parties to follow-up on the issues representatives from the Cumberland Homesteads Tower Association raised at the 21 February 2003 meeting. In addition to Homesteads representatives, Patrick McIntyre from the Tennessee Preservation Trust and Autumn Rierson, an attorney for the National Trust for Historic Preservation, attended. Ralph Comer, Director of the Planning Division, explained the UT study process and how they as interested citizens could participate. Jeff Jones, Director of the Design Division, told them that that earliest possible letting date would be July 2004 which would depend upon approval from the legislature. Jerry Moorehead from the Planning Division explained the chosen termini, latest traffic projections, and the lack of viability of improving State Route 101 only. Jeff Hogue from the Right-of-Way Division explained where they were in the right-of-way process. Dave Davis from the Design Division gave accident and traffic figures that indicated that the triangle intersection had a 1.09% accident rate over a three-year period which was substantially higher than the 0.17% statewide average. Figures also indicated that the critical accident rate was at 0.48% which meant that there were six times more accidents at the triangle intersection than at comparable intersections. In addition, Mr. Davis provided everyone with preliminary plans showing a raised median. Mary Mastin, attorney for the Tower Association, reiterated that their key issue is the large scale of the five-lane road. She also indicated that the group was actively pursuing the idea of a round-about in place of the historic triangle. TDOT representatives stated that a roundabout was not historically appropriate and that it would have to be huge in order to allow trucks to use it. Autumn Rierson, attorney with the National Trust, stated that she realized that the road needed to be improved but wanted it done in a context sensitive manner that would save the triangle.

After the March 21 meeting, Martha Carver emailed photographs of aesthetically treated sidewalks built in other areas. On 24 March 2003, Vicki Matthews acknowledged receipt of those photographs and said she would present them to the committee she was forming.

In a letter dated 27 May 2003 the U.S. Army Corps of Engineers responded to TDOT's February 28th letter requesting that they define the Area of Potential Effect (APE) as the lead federal agency. The letter stated that their *"preliminary determination is that the 'permit area' would include the three crossing areas (provided each involves a discharge of dredged or fill material into waters of the U.S.) and the immediate area on each side of the streams or wetland that affects the location of the crossings."* The letter further stated that their APE could be expanded if they are informed that the project will affect a nearby resource outside the APE.

On 19 June 2003, a copy of the Corps letter was faxed to Danny Olinger, a Cultural Resources Specialist with the Tennessee Valley Authority.

On 29 August 2003, TDOT representatives re-evaluated the proposed project and provided comments to the UT Study team. They noted that the lower grade affecting sight distance at the triangle was dangerous. They recommended that the project limits be re-evaluated especially near the state park to reduce impacts to the more intact area of the historic district, the design be re-evaluated to shift traffic on State Route 68 to the west (noting that existing conditions merit improvements), keep the roadway context sensitive by eliminating sidewalks and curb-and-gutters with shoulders, and having a public hearing.

At a press conference at Cumberland Mountain State Park on 24 October 2003, Commissioner Gerald Nicely announced that the need for the project had been firmly established by the UT study. However, he did say that *“more should be done to mitigate the potential negative impact on the historical district environment.”* He further stated that *“we [TDOT] plan to design an alternative intersection layout for the historic district.”* The UT Study recommended that *“the community and public should be re-engaged in a proactive way to effectively address the concerns over the proposed design and potential negative impacts on the historic district environment.”* TDOT’s next steps were to develop a new alternative for the State Route 28/State Route 68 intersection and that would be presented to interested parties within six months, eliminate Section I widening (at the state park), and schedule a public meeting within three months of the revised plan.

On 21 November 2003, staff from TDOT met to discuss beginning the Context Sensitive Solutions (CSS) process for the proposed project. In order to have a cross-section of the public involved in the CSS process, a variety of stakeholders were identified including government, special interest groups, businesses, residents, trucking companies, schools, and churches. From this list, the project manager, Ann Andrews, contacted local groups who would then recommend names of people who might be willing to participate. The TDOT group also brainstormed ideas to re-design and mitigate the project. They also had recommendations for the next steps in the process including hiring a facilitator and identifying a citizens advisory committee and meet with this group before redesigning the intersection.

In a letter dated 10 December 2003, Elizabeth Merritt, Deputy General Counsel for the National Trust for Historic Preservation, wrote to Ed Cole, Chief of Environment and Planning at TDOT, and Bobby Blackmon, FHWA Division Administrator, reiterating their desire to be a consulting party in the Section 106 process and provided names and addresses where information should be mailed.

On 15 December 2003, Ann Andrews mailed letters to Cumberland County Mayor, Brock Hill, Crossville Mayor J.H. Graham, Ms. Wendy Askins, Executive Director of the Upper Cumberland Development District, and Ms. Vicki Matthews, Chairperson of the Cumberland Homesteads Tower Association. The letters asked for recommendations for possible resource team members.

On 18 December 2003, Ann Andrews sent letters identical to the December 15th letters to State Senator Charlotte Burks, State Representative Raymond Walters, and U.S. Representative Lincoln Davis asking for resource team member recommendations.

In a letter dated 23 December 2003, Ed Cole responded to Elizabeth Merritt's December 10th letter and informed her about the beginning of the CSS process that will include Vicki Matthews as a representative of the Tower Association.

2004

In January 2004, TDOT staff had a series of discussions with Palmer Engineering to discuss the kick-off meeting with the Citizen's Review Team (CRT) for the project. The consultant was charged with interviewing potential members of the CRT that represented a cross-section of interested parties near the triangle intersection. Palmer Engineering created a draft Scope of Services for the US 127 and SR68 Intersection that included developing a public involvement plan, creating a project mailing list, coordinating with TDOT, conducting meetings, facilitating discussions with the CRT, recording the proceedings as a public participation record and providing information to the public about the project.

On 3 February 2004, TDOT team members met to discuss Palmer's draft Scope of Work and the preliminary timetable for the project. The TDOT team approved Palmer's Scope of Work and agreed that the CRT would only deal with the triangle intersection. The desired ending date was 30 June 2004. However, the team determined that the desired meeting dates outlined in the Scope of Work should be flexible and only be a guide to work from depending on the issues raised at the CRT meetings. TDOT also agreed to supply the consultant with preliminary names of interested parties that might be able to recommend people to be members of the CRT.

In a letter dated 9 February 2004, Ed Wasserman, Director of TDOT Structures Division, provided Jim Johnston, Region 2 Survey and Design with cost information for replacing two bridges on the State Route 28 project.

On 11 February 2004, the TDOT team field reviewed the project along with the consultant. The consultant provided a brief PowerPoint presentation about the CSS process and provided a general timeline for the project. TDOT Region 2 design presented existing proposals and visited the project area. The group

discussed proposed CRT members. The consultant presented the draft interview questionnaire, and revisions were recommended. The first CRT meeting was tentatively scheduled for the first week in March.

On 17 February 2004, Martha Carver was made aware by local residents that a CCC camp was located near the triangle. She checked with the National Register coordinator at the TN-SHPO about Criterion D significance. The TN-SHPO was unaware of a CCC camp and doubted if there would be any Criterion D significance even if a camp was located near the triangle. Phil Hodge, TDOT Archaeologist for Region II agreed to visit the site and test for a possible archaeological site.

On 18 February 2004, Martha Carver, TDOT Historic Preservation Manager, contacted Danny Olinger and Eric Howard, TVA archaeologists, about identifying the Area of Potential Effect for the three areas on the U.S. 127S project that might need a federal permit. Mr. Howard responded that TVA has not received a permit application for those areas and could not identify the APE until an application had been received.

On 18 February 2004, Ed Cole, with TDOT, provided the Commissioner information on the team selection process and criteria and the stakeholders involved. The Commissioner approved the list of recommended CRT members.

The first CRT meeting was held on 24 March 2004 at Cumberland Mountain State Park. The CRT members in attendance:

Thomas Looney—citizen

Charlotte Stevens—owner of Charlottes Interiors

Gary Hood—Representative for Hood Funeral Home

Meredith Mullen—Representative for Cumberland Mountain State Park

Claudette Stager—National Register Coordinator for the TN-SHPO

Shirley Parris—Representative for the Cumberland County School Board

Steve Bosland—citizen

Doug Little--citizen

Carl Olsen—Representative for the U.S. Army Corps of Engineers

Vickie Matthews—Representative for the Cumberland Homesteads Tower Assoc.

Helen Inman—Representative for the Cumberland Homesteads Tower Assoc.

Ellis Kirby—Representative for the Cumberland Medical Center

Joe Miller—Representative for the City of Crossville

Helen Rucker—Representative for the Tennessee Valley Authority

Nita Boring—President of the Cumberland Co. Historical & Genealogical Society

The meeting began with opening remarks from Ann Andrews and a PowerPoint presentation by the consultant on the CSS process and how the CRT would fit into that process. A state trooper with the TN Highway Patrol spoke and described the accidents that have occurred at the intersection. The CRT learned about the history of the project and was told their only charge was to study alternatives at the triangle not review the entire 127S project. Palmer Engineering presented traffic simulations showing the breakdown in current traffic patterns and with future traffic. The CRT participated in a workshop to develop project issues that needed to be addressed. The issues the group defined included limited visibility, intersection alignment, parking, the school, traffic enforcement, historic significance, traffic flow, and alternative modes of transportation. The CRT broke into small groups to sketch possible design solutions that would solve the issues they outlined earlier. There were 15 sketched solutions and each group or team member explained their solution. Several were similar so the consultant narrowed them down to 8 different alternates that TDOT and Palmer agreed to evaluate. Palmer requested that all CRT members discuss the CSS process with others in the community and gather information from the community about the proposed alternatives.

On 6 April 2004, Ann Andrews received a copy of a letter Vickie Matthews, a member of the CRT, sent to concerned citizens about the CSS process. She acknowledged that the CSS process would be tailored to fit different projects and that TDOT appeared to be flexible in their responses to local issues. She was positive about the CSS process but admitted that she had hoped the resource team would be able to deal with the entire 127S project rather than only the triangle.

On 26 April 2004, Ann Andrews received a letter from Helen Inman, President of the Cumberland Homesteads Tower Association and CRT member, requesting that the CSS study be extended beyond the triangle into the entire 127S project. In a response letter dated 7 May 2004, Ann Andrews responded to Ms. Inman stating Commissioner Nicely's announcement that CSS would only be applied to the triangle area not the entire project and that the department had no plans at that time to extend the CSS project.

On 5 May 2004, the second CRT meeting was held at Cumberland Mountain State Park. CRT members in attendance included:

| | |
|---------------------------------|-----------------|
| Conrad Welch (new hospital rep) | Carl Olsen |
| Charlotte Stevens | Vickie Matthews |
| Meredith Mullen | Harold Draper |
| Shirley Parris | John Walton |
| Steve Bosland | John Marvin |
| Doug Little | Nita Boring |

The second CRT meeting revisited issues brought up at the previous meeting including limited visibility, intersection alignment, parking, the school, traffic

enforcement, history, traffic flow, alternative modes. The CRT also raised new issues that included residential relocations, commercial relocations, project cost, economic development, and compatibility with local planning. After identifying these issues, Palmer facilitated a CRT workshop that required members to rank the issues according to importance. Each team member was asked to pick out their two highest priorities, two lowest priorities, and then rank the remaining priorities as high, medium, or low. The following table indicates the ranking given to each issue by the CRT.

| Issue | High Priority | Medium Priority | Low Priority |
|------------------------------|---------------|-----------------|--------------|
| Limited Visibility | 11 | 2 | |
| Intersection Alignment | 7 | 2 | 1 |
| Parking (@ Tower) | 2 | 8 | 4 |
| School | 9 | 5 | 1 |
| Traffic Enforcement | 2 | 7 | 2 |
| History | 6 | 3 | |
| Traffic Flow | 8 | 4 | |
| Alternative Modes | | 7 | 6 |
| Construction Costs | | | |
| Relocations Residential | 1 | 6 | |
| Relocations Commercial | 3 | 6 | |
| Right-of-Way Costs | | | |
| Utility Costs | | 5 | |
| Economic Development | 2 | 6 | 1 |
| Compatible w/ Local Planning | 3 | 3 | 1 |

As noted on the table above, the following rankings indicate the issues that received the most “high priority” rankings by the CRT

1. limited visibility
2. school
3. traffic flow
4. intersection alignment

5. history
6. commercial relocations and compatibility with local planning
7. traffic enforcement, parking, and economic development
8. residential relocations

CRT members also evaluated the alternatives by determining if the proposed alternatives alleviated the high priority issues they indicated. The results were scheduled to be announced at the third team meeting. After evaluating the issues, the CRT chose to drop the issue of Compatibility with Local Planning from further study.

On 18 May 2004, Martha Carver, Tammy Allison, Ann Andrews from TDOT, Claudette Stager and Joe Garrison from the TN-SHPO met to discuss each of the seven alternatives proposed by the team members and their relationship to historic issues for the Section 106 process. Each of the seven alternatives were broken down with positive and negative aspects of each discussed. The following table indicates the TN-SHPO's response to each of the alternatives.

| Alternative | Positive | Negative |
|--------------------|---|---|
| A | Majority of the work is within row Retains access to the triangle Takes non-contributing buildings Stays close to historic road patterns | The primary road no longer utilizes the triangle |
| B | | Takes a lot of right-of-way Moves further away from the historic road pattern |
| C | Better than Alt. B because takes less right-of-way but worse than A | Takes more right-of-way |
| D | Keeps historic road pattern but nothing else | Reduces/destroys the triangle |
| E | Keeps historic triangle | Takes a lot of land from the historic district Does not retain the historic road pattern Cutting a new road on new location within a historic district is bad |
| F | | Roundabout is awful Destroys the triangle |
| G | Keeps the historic road pattern Takes little right-of-way | Destroys historic landscape including the triangle |

The third meeting of the CRT took place on 26 May 2004 at Cumberland Mountain State Park. Attendees at the meeting included:

J.H. Graham
Helen Inman
Claudette Stager

Gary Hood
Conrad Welch
Charlotte Stevens

Meredith Mullen
Shirley Parris
Steve Bosland
Doug Little
Carl Olsen

Vicki Matthews
Harold Draper
John Walton
John Marvin
Nita Boring

The seven alternatives that the CRT drew in Meeting One and were presented after TDOT designers did a preliminary design in Meeting Two were evaluated by the CRT based on the ranking of issues identified at Meeting Two. The CRT reviewed the issues defined in the previous meeting and no one objected to the previous determinations. Palmer engineering presented each of the seven design alternatives to the CRT and discussed the rating of priorities in comparison to these alternatives. The CRT was charged with determining which of the seven alternatives should be presented to the public at a public meeting. The CRT chose to present Alternatives A, B, C, and D at the public meeting. A preliminary date and time was established for a public meeting to present these alternatives. Since the CRT had selected these alternatives, each CRT member was asked to attend to help the public understand the alternatives and the role of the CRT. The public meeting was to include a formal presentation along with exhibits including visualizations, simulations, and plan views along with providing comment cards for the public to express their opinions.

On 24 June 2004, a public meeting was held at the Cumberland Mountain State Park Recreation Lodge from 6:00-8:00pm. Eighteen staff members attended including both TDOT and Palmer Engineering staff and ninety-six people attended. The objective of the meeting was to get public input on the four alternatives that the CRT had chosen to move forward with in three previous meetings. The public was asked to complete a questionnaire at computer stations, fill out a questionnaire, or speak with a court reporter. The results are included in the following table:

| | Computer Responses | Questionnaires Returned | Letters | Total |
|-------------------------------------|---------------------------|--------------------------------|----------------|--------------|
| Oppose All | 4 | 30 | 7 | 41 |
| Oppose All— requests 3 lanes | | | 8 | 8 |
| Support | | | | |
| A | | | 1 | 1 |
| B | | 1 | | 1 |
| C | 1 | | | 1 |
| D | 5 | 8 | 1 | 14 |
| Can Accept | | | | |
| A | | | | |
| B | | | | |
| C | 1 | 7 | | 8 |
| D | 2 | 13 | | 15 |
| ALL | 1 | | | 1 |

Ten resource team members attended the public meeting including Mayor J.H. Graham, Doug Little, Helen Rucker from TVA, Steve Bosland, Vicki Matthews, Nita Boring, Meredith Mullen, Claudette Stager, Helen Inman, and Conrad Welch. Members of the Cumberland Homesteads Tower Association, including CRT member Vicki Matthews, set up tables outside the meeting and distributed incorrect information to the public regarding the four alternatives, distributed black arm bands and black ribbons with “Endangered Historic District”. The meeting’s goal was to focus on the triangle intersection only (which the CRT had been charged with); however, the majority of people in attendance opposed the entire 127S project, making no distinction between the intersection and the roadway.

On 6 July 2004, Tammy Allison, a historian at TDOT, mailed a packet of information that included the original historic report, wetland sites along the project corridor, and additional correspondence to Harold Draper, a member of the CRT and NEPA Team Leader at TVA. This information was originally mailed to Danny Olinger at TVA in March 2003.

On 15 July 2004, Mary Mastin, an attorney working with the Cumberland Homesteads Tower Association, wrote a letter to Ed Cole, Chief of Environment and Planning at TDOT. The letter indicated her dissatisfaction with the widening of 127S and the CSS process in general. She noted her “dismay” at the lack of interest the 127S CRT appeared to have for environmental issues including historic preservation and the appearance that the CRT did not have enough members holding the same environmental beliefs that she does. Ms. Mastin also mentioned the public meeting and the public’s focus on the entire road project rather than the

triangle intersection. The letter concluded by questioning the need for a larger roadway south of Crossville and TDOT's environmental policies in general.

On 16 July 2004, TDOT team members met to discuss the June 24th public meeting and the projected finishing date for the CRT. Since several people questioned the need for improving the intersection, it was agreed that Steve Allen would attend the next CRT meeting to discuss traffic forecasting studies. In order to alleviate the public's worry that environmental documents had not been prepared, it was agreed to have one copy of the Technical Studies Report (including ecology, archaeology, and historic) available for viewing at the next CRT meeting.

In a letter dated 20 July 2004, Ed Cole responded to Ms. Mastin's letter explaining the process for picking the CRT which included receiving recommendations from local government officials, state officials representing the area, special interest groups, resource agencies, and volunteer citizens. He ensured her that historic interests were represented on the CRT and that the need for an improved roadway south of Crossville had been well established by TDOT.

Meeting IV for the CRT was held on 28 July 2004 at Cumberland Mountain State Park. CRT members in attendance were:

| | |
|-------------------|----------------|
| Helen Inman | Doug Little |
| Claudette Stager | Vicki Matthews |
| Conrad Welch | Harold Draper |
| Charlotte Stevens | John Walton |
| Meredith Mullen | John Marvin |
| Steve Bosland | Nita Boring |

Dennis Cook, with TDOT Environmental, reviewed the CSS process and the project history, and the environmental process for state-funded projects. He reiterated that the CRT was charged with making a recommendation to the commissioner who will make the final decision on the project. Steve Allen provided the CRT with information on the traffic counts and traffic forecasting studies. Palmer Engineering went over the steps the CRT had taken thus far to determine the four alternatives that were presented to the public, discussed enhancements and amenities that could be used on any of the alternatives, and presented traffic simulations developed after Meeting 3. Palmer also introduced Alternative D-2. The CRT voted to drop all of the alternatives and go forward with Alternative D-2.

On 16 August 2004, TDOT team members met to discuss the design of Alternative D-2 before presenting the design plans to the CRT. Several issues with D-2 were addressed including access to remaining stores at the intersection, access to parking at the Tower Museum, intrusion in the historic district, maintenance of the triangle configuration, coordination with Charlotte Stevens, a CRT member and owner of Charlotte's Interiors, and further design tweaks.

In a series of emails on 16 August 2004, Tammy Allison asked Claudette Stager, the National Register Coordinator at the TN-SHPO and a CRT member, several questions regarding historic issues raised by Alternative D-2.

1. The current configuration of tower parking will be obliterated with this alternative. TDOT proposed moving the parking to the rear of the tower and build them a new parking lot and sidewalks to the front of the building. The TN-SHPO agreed that the current parking configuration wasn't historic and that removing it to the rear of the building would be more aesthetically pleasing by giving an unobstructed view of the tower.
2. With D-2, in order to keep the triangle configuration, a retaining wall was proposed that would have new landscaping inside it. The TN-SHPO agreed that the wall would be acceptable as long as there were aesthetic treatments and plantings that fit with the historic character of the area. This would include a treatment such as crab orchard stone and plantings that were weedier and wilder than the boxwoods currently in front of the tower.
3. D-2 would move the parking from the front of the Cumberland General Store to a proposed access road near the buildings.
4. D-2 would remove the modern fire hall located on SR127. Research indicated that the building is not historic. The design of all previous alternatives had resulted in its demolition.

On 6 December 2004, the TDOT team met to discuss Alternatives D and D2, strategies for presenting these options to the CRT, and adjustments on the schedule for completion. Both alternatives were reviewed and staff agreed to make specific adjustments to each. The meeting with the CRT was tentatively scheduled for mid-January 2005 so TDOT could continue to analyze each option and provide further recommendations for the design of the intersection.

2005

On 20 January 2005, the CRT met at the Crossville Community Complex. CRT members attending included:

| | |
|-------------------|------------------|
| Helen Inman | Harold Draper |
| Claudette Stager | John Walton |
| Conrad Welch | Nita Boring |
| Charlotte Stevens | Richard Campbell |
| Meredith Mullen | Shirley Parris |
| Doug Little | Carl Olsen |
| Vicki Matthews | |

The meeting started with a brief history of the public meeting held the previous year and the four alternatives that were presented to the public and the addition of the Alternative D revisions suggested at Meeting IV. With the design changes required

for Alt. D—D-Modified had evolved into three alternatives D-75, D-80, and D-90. The differences in the D alternatives are:

- D-75—the State Route 68 approach was skewed 15 degrees left of the US 127 tangent at the point of intersection
- D-80—the State Route 68 approach was skewed 10 degrees left of the US 127 tangent at the point of intersection
- D-90—the State Route 68 approach tangent is perpendicular to the US 127 tangent at the point of intersection.

Steve Allen presented the changes in the traffic forecast that indicated an error in previous forecasts. The correct traffic forecasting data showed a 25% reduction in current traffic counts which reduced traffic forecasts for 2025 by 39%. The new traffic forecasts were input into each of the traffic simulations the consultant had been working with. Palmer Engineering presented traffic simulations using the three D alternatives and a PowerPoint on the possible enhancements and amenities that could be used as mitigation measures on any of the proposed alternatives. The CRT discussed possible mitigation measures, including:

- Parking for the Tower Museum
- Preparing a driving tour
- Photo documentation of the existing community

Relocating the historic Eldridge House within the district was discussed as a possible enhancement. Due to the issues associated with relocating a historic building, TDOT did not consider this proposal as mitigation but instead as an effort to work with the locals to preserve a historic structure and enhance the outcome of TDOT’s proposed project.

The CRT was then asked to provide advantages and disadvantages to either Alternative D or one of the Alternative D Modified options. The results are in the table below:

| | ADVANTAGES | DISADVANTAGES |
|-------------------------------|---|--|
| ALTERNATIVE D | <ul style="list-style-type: none"> • Tower Parking remains in front • Project Cost • Retains Business Sites • Fewer Conflict Sites • Handicap Access • Project Schedule • Traffic Flow | <ul style="list-style-type: none"> • Less Distinct Triangle • Possibly, No Eldridge House Relocation • Less Free Flow of Traffic • Tower View Shed |
| ALTERNATIVE D MODIFIED | <ul style="list-style-type: none"> • Maintains Historic Character • Free Flow Right Turn (SR68) • Removes Non-Contributing Structures from HD • Possible use of Development Easements | <ul style="list-style-type: none"> • Parking on School Side of Tower • Project Cost • More Conflict Sites • Tower Access |

A consensus was reached among the CRT that the only D-Modified concept to be further explored would be Alternative D-90. The next CRT meeting was tentatively set for March.

In February 2005, the consultant checked on the cost of moving the Eldridge House as part of potential enhancement for the project. Ann Andrews, the project manager, briefed the commissioner and provided him with a very tentative timeline for completing the project after the CRT had made their recommendation.

In a letter dated 15 March 2005, Trip Pollard, a lawyer for the Southern Environmental Law Center, wrote to Ann Andrews expressing his concerns with the proposed alternatives. He reiterated the historic issues with either of the alternatives and pointed out the problems with expanding the 127S corridor to five lanes. He urged TDOT to reconsider the entire project and continue to consider changes to the triangle intersection requested by CRT members.

On 17 March 2005, the CRT met at Cumberland Mountain State Park. The CRT members in attendance were

Helen Inman
Claudette Stager
Conrad Welch
Charlotte Stevens
Doug Little
Vicki Matthews

Harold Draper
Richard Campbell
Shirley Parris
Carl Olsen
Thomas Looney

The CRT discussed Alternatives D and D-Modified with a question and answer session about various design aspects. Ann Andrews explained that the Eldridge House could be moved as part of either alternative or completely separately. An acceptance poll was taken with Alternative D-Modified being acceptable to 7 members and unacceptable to 3 members. After it was determined that the majority of the CRT accepted D-Modified, the CRT prepared an Executive Summary to be given to Commissioner Nicely for his review. Nine of the eleven team members present signed the Executive Summary. Ann Andrews then asked for volunteers and additional names for an Enhancement Committee that will help with the aesthetic enhancements included in the project.

In an email dated 28 March 2005, Vicki Matthews, a member of the CRT, forwarded survey results performed at a meeting of the Cumberland Homesteads Tower Association regarding the alternatives discussed at the 17 March 2005 meeting. This unscientific survey showed that IF the intersection was modified the majority felt that Alternative D-Modified should be chosen. However, most felt that the alternative still needed improvement.

On 15 April 2005, Stephen L. Rains with Progressive Savings Bank sent a letter to Herbert Harper, the Deputy TN-SHPO that the bank's expansion did not fall under

Section 106 and therefore did not have to deal with the historic issues associated with building a bank in the historic district. He stated that the groundbreaking would take place approximately six weeks from the date of the letter.

In a 17 April 2005 email, Nita Boring, CRT member representing the Cumberland County Historic Society, emailed Ann Andrews her opinion that Alternative D would be the better choice for the intersection. She stated that even though the triangle would be lost, a historic marker identifying its location would be sufficient for “most older Homestead residents.” Ann Andrews included her opinion in the CRT’s Recommendation Book.

On 25 April 2005, Bethany Hawkins, a concerned descendent of an original Homestead owner, expressed her concerns about the project via email. She pointed out that the triangle is the centerpiece of the historic district and could be used to promote heritage tourism. Ann Andrews responded on 26 April 2005 explaining the CSS process and the role the CRT played in developing the alternative recommended to the commissioner.

On 26 April 2005, Commissioner Nicely received an email letter from David Deere, a Cumberland County resident who had read an article in the *Tennessean* and spoke with someone from the Cumberland Homesteads Tower Association. He questioned TDOT’s handling of the project and expressed concern about building the project within a historic district. On 27 April 2005, Ann Andrews responded to Mr. Deere’s email explaining the CSS process and how the CRT played a role in the recommendations being reviewed by Commissioner Nicely. Mr. Deere responded by asking about the historic review process. Ms. Andrews responded that federal permits are required on the project; therefore it will fall under Section 106 of the National Historic Preservation Act. She also stated that TDOT has known about the historic district since the project started and has worked to minimize impacts to the district.

In a 17 May 2005 email letter, Attorney Mary Mastin pointed out that the CRT-approved D-Modified still did not save the existing triangle and this proposal was contrary to the statement Commissioner Nicely made at Cumberland Mountain State Park. She urged TDOT to have another public meeting to discuss the alternative that the CRT recommended. She noted that Vicki Matthews was optimistic throughout the CSS process and asked that TDOT move forward quickly to move the Eldridge House before the Progressive Savings Bank demolished it.

On 17 May 2005, Ed Cole responded to Ms. Mastin via email saying that the CRT recommendation was under review by the commissioner and that a public meeting would be scheduled. Mr. Cole also noted that when moving the Eldridge House was proposed, there was no sense of urgency and that this possible enhancement could be a part of TDOT’s normal evaluation process.

On 18 May 2005, Martha Carver emailed Joe Garrison, Section 106 Review and Compliance Coordinator at the TN-SHPO, about Section 106 requirements for the Progressive Savings Bank. Mr. Garrison responded that since the bank is actually a savings and loan no federal permits are required so they do not have to comply with Section 106 regulations.

Note: On 19 July 2005 the Progressive Savings Bank razed the Eldridge House eliminating any possibility of TDOT moving it as an enhancement for the project. TDOT historians first learned the house was razed from a newspaper article in the Crossville Chronicle.

On 15 August 2005, Nancy Tinker, Program Officer with the National Trust for Historic Preservation, wrote to the Cumberland County Mayor, Brock Hill, reminding him of the importance of the Cumberland Homesteads. She stated that they understood that the selection of the Modified D plan by the CRT hinged on moving the Eldridge House and requested that since the house was demolished the plan should be revisited that would “reduce negative impacts to historic structure and landscape located within the design’s footprint.” In a letter dated 1 September 2005, Commissioner Nicely, who was copied on the original letter, responded to Ms. Tinker, explaining the role of the CRT to the process. Commissioner Nicely also informed her that an enhancement committee was being formed to study aesthetic treatments for the project.

On 18 August 2005, E. Patrick McIntyre, Jr., Executive Director of the Tennessee Preservation Trust, wrote to Commissioner Gerald Nicely regarding the State Route 28 project. Mr. McIntyre agreed with the resolution passed by Cumberland County Commissioners and requested that TDOT continue to work with local citizens to find a way to preserve the historic triangle. He also mentioned his shocked sadness at the loss of the Eldridge House after it was razed by Progressive Savings Bank. On 1 September 2005, Commissioner Nicely responded to Mr. McIntyre’s letter and explained the CSS process and the efforts TDOT has made at designing an intersection that takes into account both roadway standards and the historic landscape at the triangle intersection. He further stated that the CSS process would continue for this project by forming an enhancement committee that would help decide on aesthetic enhancements for the project.

On 22 August 2005, Mary M. Mastin, an attorney with Paddock & Mastin, wrote to Commissioner Gerald Nicely regarding the proposed State Route 28 project. Ms. Mastin commended TDOT for going through the CSS process. She attended the Cumberland County Commission meeting on 15 August 2005 and agreed with their resolution. However, she requested that TDOT continue to re-design the intersection to find ways to shift the alignment away from the Homesteads Tower while not taking any buildings from the intersection. She requested that TDOT save the current triangle, shift the alignment away from the Homestead Tower, leave the Cumberland General store intact, and construct a visitor’s center near the general store site. She also enclosed a drawing (not to scale) indicating how each of her

requests could be successfully implemented. On 1 September 2005, Commissioner Nicely wrote to Ms. Mastin explaining that the CSS process worked with the public and local officials to design an intersection that both adheres to roadway standards while considering the historic character of the area. Commissioner Nicely further stated that the CSS process would continue through the work of an Enhancement Committee that was formed to recommend aesthetic features of the intersection. He also stated that he was disappointed that the Eldridge House was demolished while TDOT was pursuing options for relocation. He provided Ms. Mastin with Ann Andrew's phone number if she had additional questions or comments about the project.

On 13 September 2005, members of the TDOT team met to discuss the standing of the project. It was determined that a public information meeting would be held to present the public with the CRT's recommendation. The Enhancement Meetings would be set up after the consultant had put together an Enhancement Committee based on the recommendations of local officials and local experts in landscape design, and an interested CRT member. The committee would most likely consist of five or six members that would brainstorm ideas, prioritize those ideas, and choose the enhancements they want based on overall enhancement cost. TDOT designers began working on tweaking the alignment the CRT recommended in order to address the concerns the Cumberland County Commissioners and others have stated. They will present this information to TDOT upper management for a decision on how to proceed. Ann Andrews would continue to be the contact person and would keep team members informed as the process moved along.

On 21 November 2005, Ann Andrews provided TDOT team members with the Enhancement Committee list. Committee members include

Mayor Brock Hill—Cumberland County Mayor
Conrad Welch—U.S. 127 South CRT Member
Claudette Stager—National Register Coordinator at the TN-SHPO
Randall Williams—Historic Preservation Planner for the Upper Cumberland
Development District
Rhonda McCuiston—Homestead Tower Association
Sandra Purcell—Homestead Tower Association

The Enhancement Committee is scheduled to begin meeting in May of 2006.

PUBLIC PARTICIPATION

On March 15, 2006, TDOT mailed letters to the Cumberland County Mayor, Mr. Brock Hill and Crossville Mayor, Mr. J.H. Graham, asking them to be participants in the historic review process as consulting parties. Appendix F contains copies of this correspondence.

On March 15, 2006 TDOT mailed letters to eight groups or tribes representing Native American interests and asked them if they wished to participate in the historic review process as consulting parties (list below). To date, TDOT has not received any responses related to architectural resources. Appendix E contains a copy of the letter.

Augustine Asbury
Alabama-Quassarte Tribal Town

Gary Bucktrot
Kialegee Tribal Town

Dr. Richard Allen
The Cherokee Nation

Joyce Bear
Muscogee (Creek) Nation

Tyler Howe
Eastern Band of Cherokee Indians

Rebecca Hawkins
Shawnee Tribe

Charles D. Enyart
Eastern Shawnee Tribe of Oklahoma

Lisa Stopp
United Keetoowah Band of Cherokee
Indians

In the fall of 1986, the Environmental Planning Office of the Tennessee Department of Transportation prepared a list by counties of historic groups and other such organizations which might be interested in proposed projects. This list was compiled using the following sources:

- the State Historic Preservation Office's list of current county historians,
- the State Historic Preservation Office's list of Historic Sites and Museums,
- the State Preservation Office's list of Historical Societies,
- the National Trust for Historic Preservation's list of member organizations in Tennessee, the American Association for State and Local History *Directory of Historical Societies and Agencies in the United States and Canada* (Twelfth Edition, 1982),
- interested State Review Board members, and
- a questionnaire mailed to each of Tennessee's ninety-five County Mayors.

This list is regularly updated and refined.

From this list, TDOT identified a number of historical groups and individuals in the county in which the project is located. TDOT will mail a copy of this report to them. Appendix F contains a copy of related correspondence.

Mr. Brock Hill
Cumberland County Mayor
Cumberland County Courthouse
Crossville, TN 38555

W. Walter Hall
Pleasant Hill Historical Society of the
Cumberlands
P. O. Box 264
Pleasant Hill, TN 38578

Randal Williams
Historic Preservation Specialist/Planner
Upper Cumberland Development District
1225 South Willow Avenue
Cookeville, TN 38506

Mr. Danny Olinger
Tennessee Valley Authority
Cultural Resources
400 West Summit Hill Drive
Knoxville, TN 37902

Gordon Kokes, President
Cumberland County Historical and
Genealogical Society
20 South Main Street
Crossville, TN 38555

Cumberland Homesteads Tower
Association
371 Hwy. 68
Crossville, TN 38555

Mrs. Barbara Parsons
P.O. Box 1001
Crossville, TN 38557-1001

John B. Hildreth
National Trust for Historic Preservation
Southern Office
456 King Street
Charleston, SC 29403

ENVIRONMENT AND LAND USE

The proposed project is located in Cumberland County, in the eastern section of middle Tennessee, in the physiographic region known as the Cumberland Plateau. Characterized by a mixture of mountainous areas and valleys, the Cumberland Plateau was once known as “The Wilderness” because of its rugged terrain.¹ Although the project is generally located in a rural area, surrounding land use contains substantial residential and commercial use.

It is expected that the proposed project would stimulate current developmental patterns of land along or adjacent to the project corridor. It is expected that this development would occur regardless of implementation of the proposed improvement, but probably at a more gradual pace. The project, as proposed, is not in conflict with the long range planning activities of any local or regional planning authority. Any growth resulting from implementation of the proposed project should be adequately controlled by local government agencies.

Historical Overview of the Project Area

Cumberland County was created in 1856 by the General Assembly taking land from surrounding counties. The area had been used extensively since the first settlers moved into the Tennessee area in the late 1700s as a transportation route to other locations. The rugged terrain of Cumberland County kept settlement to a minimum

¹ Stanley J. Folmsbee, Robert E. Corlew, and Enoch L. Mitchell. *Tennessee: A Short History* (Knoxville: University of Tennessee Press, 1969), 8 and 9.

until the early twentieth century. The Tennessee Central Railroad came to the county in 1900, spurring settlement throughout the area.

During the Great Depression, a New Deal Program created Cumberland Homesteads, a program that provided housing to needy deserving families. The project failed to accomplish its goals of self-sufficient farming and cooperative business. However, it left a lasting impact on the town of Crossville. Cumberland Homesteads is listed in the National Register of Historic Places. The county has grown rapidly in the last decades of the twentieth century, becoming an ideal location for older people retiring to a semi-mountainous area.²

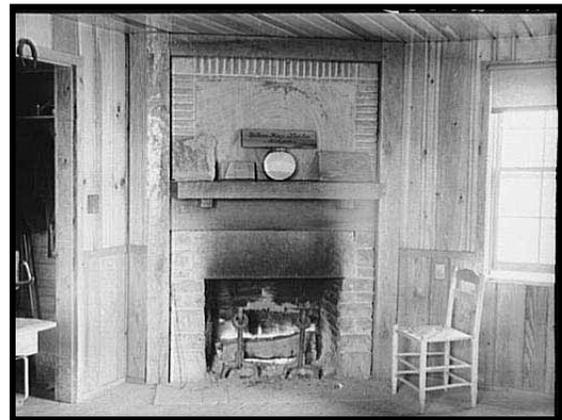


Figure Three: 1930s photographs of houses in Cumberland Homesteads. Available at the Library of Congress website at www.memory.loc.gov.

SURVEY METHODOLOGY

Pursuant to regulations set forth in 36 CFR 800 guidelines, TDOT historians field reviewed the project several times between 1996 and 2005. The purpose of this survey was to determine if any properties in the project impact area were either eligible for inclusion or are included in the National Register of Historic Places. A project's area of potential effects (APE) is defined in 36 CFR 800.16 (d) as

the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

² G. Donald Brookhart, "Cumberland County." *Tennessee Encyclopedia of History and Culture*. Edited by Carroll Van West. (Nashville: Tennessee Historical Society, 1998), 223.

The APE for the proposed project was defined by the Tennessee Valley Authority (TVA) in conjunction with the United States Army Corps of Engineers (USACE) since TVA serves as the lead federal agency that is issuing permits for stream crossings and wetlands along the project corridor. TVA determined that the Area of Potential Effect for the proposed project would be the entire length of the project.

The proposed improvements will widen State Route 28 (U.S. 127) from State Route 68 to Cleveland Street on largely the existing location. The project area is located within the Cumberland Homesteads Historic District that contains over 10,000 acres in Cumberland County. The majority of the proposed project is located within a section of the historic district that has been privately developed including the construction of a bank branch office at the site of a Homestead House, a private, upscale subdivision on a Homestead site, and numerous modern commercial buildings and private residences.

The area of potential effect for this project includes the following:

- A corridor approximately 1,500 feet from the proposed roadway improvements that require additional right-of-way and subsequent transition work that would require additional right-of-way;
- Areas within the nearby viewshed of the proposed project;
- Areas within the potential noise impact area (up to 500 feet from the proposed improvements); and

TDOT checked the survey records of the Tennessee State Historic Preservation Office (TN-SHPO) to determine if previous surveys had identified any historic properties in the area. A survey of Cumberland County has been performed by the Tennessee Historic Commission (THC). Survey records indicated that one large National Register historic district is located in the general area; the Cumberland Homesteads Historic District.

When possible, TDOT historians interviewed property owners and local historians. They also checked the repositories of the Tennessee State Library and Archives and the Tennessee Department of Transportation.

A Documentation of Effect report to assess the impacts of the proposed improvements upon the historic properties required by 36 CFR 800.5 (in compliance with Section 106 of the National Historic Preservation Act of 1966) is included in this document. Because this project is state-funded, Section 4(f) of the U.S. Department of Transportation Act of 1966 does not apply.

TDOT historians applied the Criteria of Effect as found in 36 CFR 800.5 (in compliance with Section 106 of the National Historic Preservation Act of 1966) to assess the impacts of the proposed improvements upon the historic properties. It is

the opinion of TDOT that the proposed project would have an adverse effect to the historic district.

SURVEYED PROPERTIES

One property was studied in the Area of Potential Effect for the proposed property. The National Register listed Cumberland Homesteads Historic District consists of over 10,000 acres of land south of the city of Crossville. The proposed State Route 28 improvements run through the historic district and terminate near the triangle intersection at State Route 68 near the Cumberland Homesteads Tower Museum.

Figure 4 shows the TN-SHPO survey map and the area surveyed by TDOT historians. Figure 5 shows the properties inventoried and surveyed by TDOT historians.

Figure Four.
TN-SHPO Survey Map

Quad Map: Crossville 109 NE
Dorton 117 NW

Area Driven by TDOT Historians



North

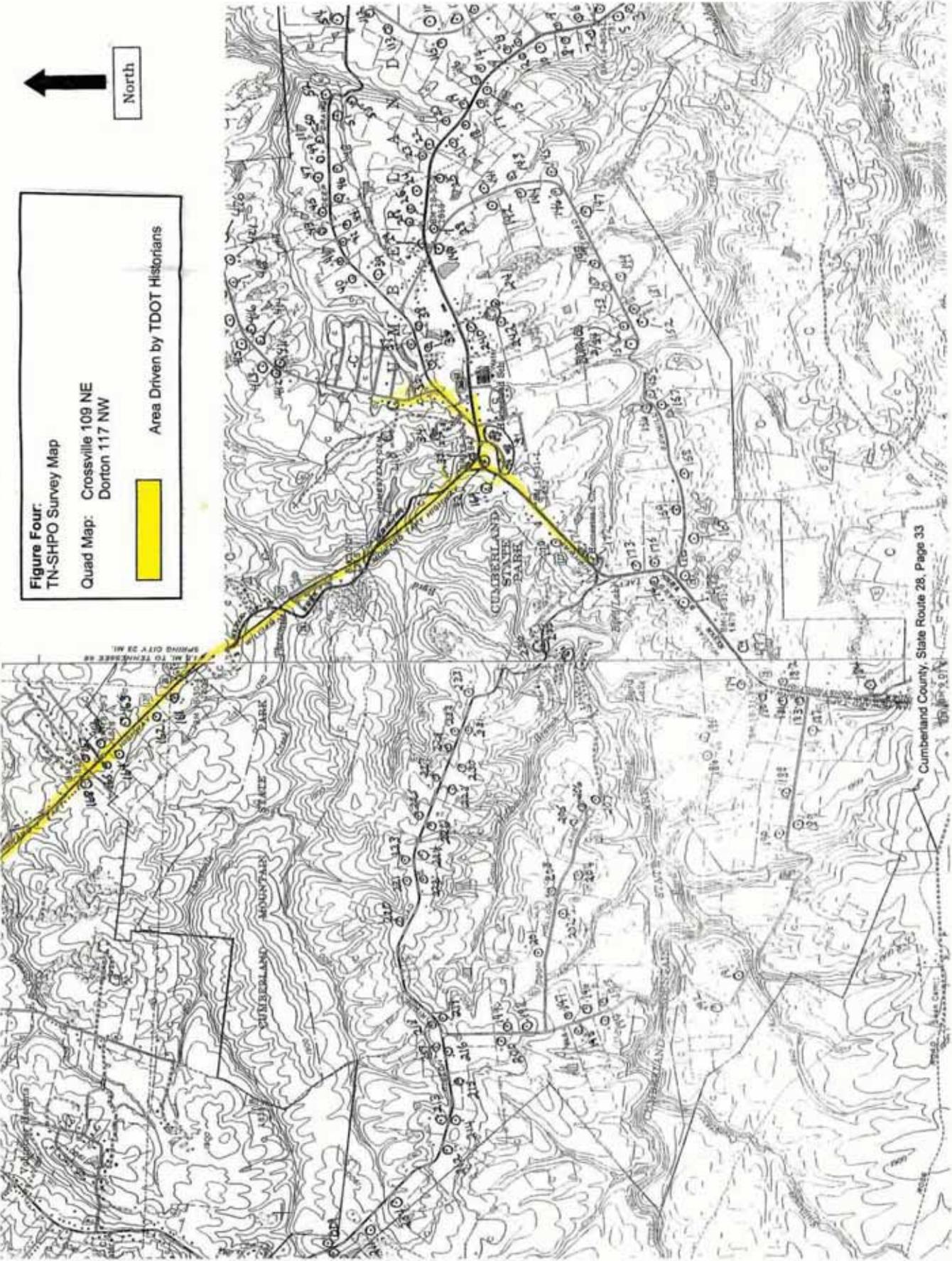


Figure Five:
Inventoried Properties
Quad Map: Crossville 109 NE
Dorton 117 NW

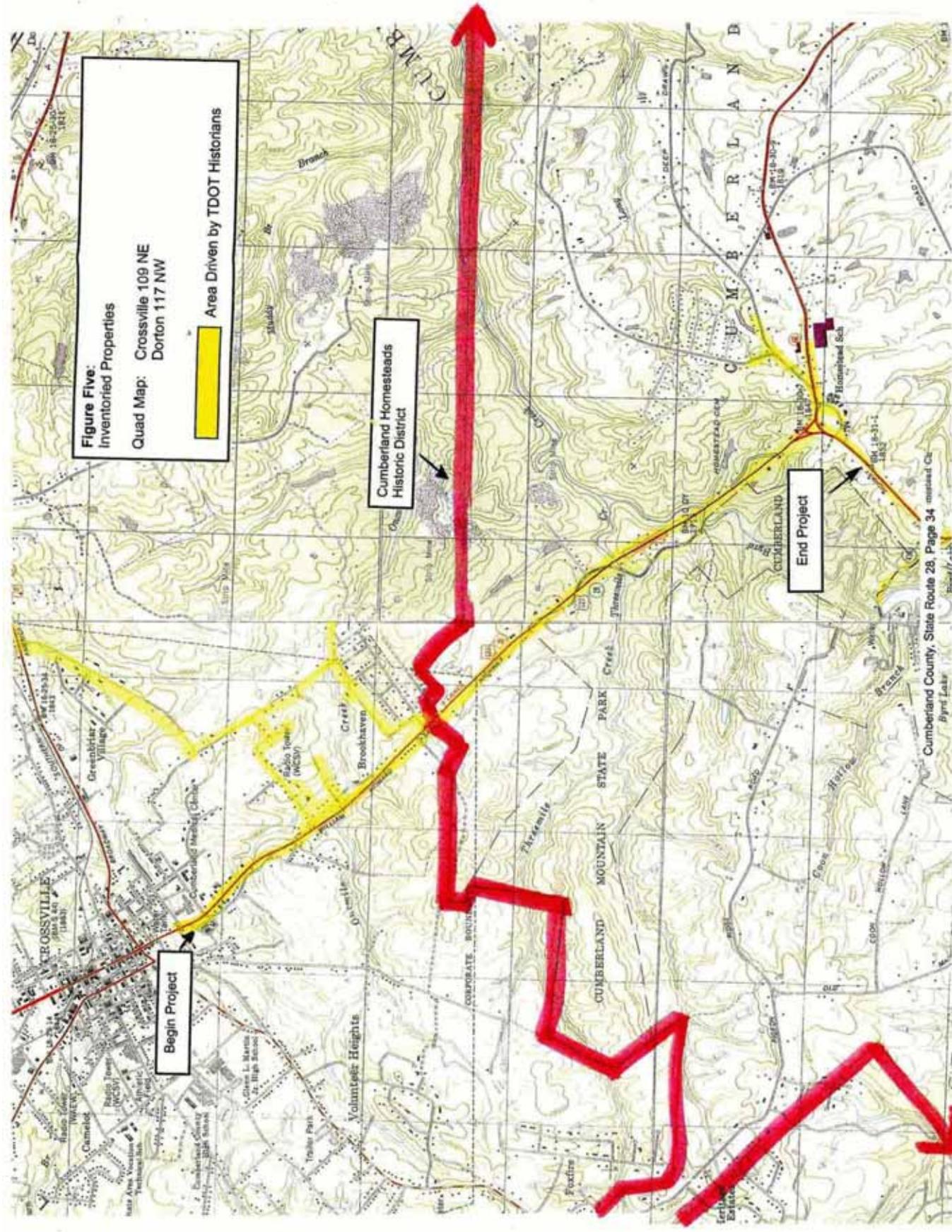
Area Driven by TDOT Historians

Cumberland Homesteads
Historic District

End Project

Begin Project

Cumberland County, State Route 28, Page 34



Properties Listed in the National Register of Historic Places

Cumberland Homesteads Historic District

National Register Listed: 1988

In 1994, TDOT historians and TN-SHPO field reviewed the proposed project. According to the 1994 survey report:

One property in the area of the project, the Cumberland Homesteads Historic District, is listed in the National Register of Historic Places in 1988. The Cumberland Homesteads Historic District contains 11,400 acres and is located on the plateau of the Cumberland Mountains at the rear of Cumberland County seat of Crossville.

In an effort to offset the devastating effects of the Great Depression on the country, President Franklin Delano Roosevelt initiated the New Deal programs to aid the nation's economy. The Cumberland Homesteads project started in 1933 as a part of this program under the Division of Subsistence Homesteads, as section of the Department of Interior. The government selected a site that was primarily undeveloped land largely acquired from timber companies. The government intended for the program to give low income/out-of-work farmers and industrial workers jobs, the opportunity to own homes, and to grow their own food and to farm on a relatively small scale in a "back-to-the-land" movement. Although over 2,000 families applied to the Cumberland Homesteads, the government selected only 250 families. Communal programs for the participants included a non-profit medical association, a cannery, a general merchandise store, an interdenominational church, and women's club.

The Subsistence Homesteading program was based heavily on agrarian reverence for the land, the "back-to-the-land" philosophy and the premise that rural living was healthier than city living for the country's poor. The Subsistence Homestead program was meant to serve as a temporary relief measure and to represent a return to the "simpler and healthier" agrarian past the country once knew. The premise behind the homestead villages was to provide families with the means to raise their own vegetables, chickens, cows, or hogs to supplement their income. In addition to the subsistence farming, emphasis was placed on community cooperation and socialization. The goal was to reeducate the stranded families to a better and healthier way of life. In addition to developing homemaking skills, the women were strongly encouraged to work with crafts, especially weaving, as a method of providing additional support for their families.

The government developed a park as an integral component of the Homesteads project. The park was located adjacent to the Homesteads on

approximately 1,500 acres of land perceived to be poor farm land and was first called the Cumberland Homesteads Park. When the State of Tennessee acquired the park in 1938, it changed the name to the Cumberland Mountain State Park. The Works Progress Administration (WPA) and the Civilian Conservation Corps (CCC) as well as the Homesteaders themselves cleared the land and performed the actual labor.

Architect William Macy Stanton designed the buildings and the layout of the colony. This design laid out a cohesively planned community containing farmsteads of a Macy-designed house and outbuildings, distributed throughout the countryside around a central core which contained schools, offices, and other cooperative buildings. All of the houses and most of the major structures, such as the bridges, were built of indigenous Crab Orchard sandstone. The area originally contained 251 homesteads on lots averaging from four to thirty-five acres with the average homestead consisting of sixteen acres. The National Register nomination contains the following information about the farmsteads.

The most prevalent and recognizable property type associated with Cumberland Homesteads is the Farm Homestead. The Farm Homesteads include a collection of buildings and structures designed for the resettlement of needy families onto small subsistence farms. A Farm Homestead consisted of a residence and a combination of outbuildings that can include barns, chicken house, smokehouse, and privy. Several Farm Homesteads still retain most of their original outbuildings, however, there are some Farm Homesteads that have no extant historic outbuildings and some outbuildings with no extant historic residence. The residences of the Cumberland Homesteads are generally one or one-and-one-half story houses with indigenous Crab Orchard sandstone walls and gable roofs. All houses originally had open entrance porches, the vast majority with shed roofs. The Crab Orchard sandstone walls were constructed with either quarried stone or field stone. Approximately fifteen different house designs were used throughout the community, but only eleven of the plans were repeated. Homeowners were allowed to make minor changes to the stock plans and several houses were built with reversed plans, different orientation to the road and variations to interior room design. A few one-of-a-kind houses were constructed. . . .

The Cumberland Homesteads provided work for its occupants as long it was under construction. But the period of steady income ended with the completion of the farm homesteads in 1938. Homeesteaders employed with the construction of the community were left without work and without a means to pay their rent on their new houses. In an effort to increase employment in the homesteads, the Resettlement Administration loaned \$55,000 to the Cumberland Homesteads Cooperative Association in

December 1936. The loan helped to establish a sorghum plant, a cannery, and to operate a project coal mine. All of the projects failed for a variety of reason; inexperience, crop failure, union troubles, lack of market for finished project, and discovery of a pocket of coal instead of the expected vein. However, a lasting testament to this social experiment is the remaining collection of houses, farm support buildings, cooperative buildings, and other structures such as the bridges.

The Cumberland Homesteads Historic District was listed in the National Register of Historic Places in 1988 under Criterion A and Criterion C for its significance in social history, community planning and development, and for agriculture and architecture.

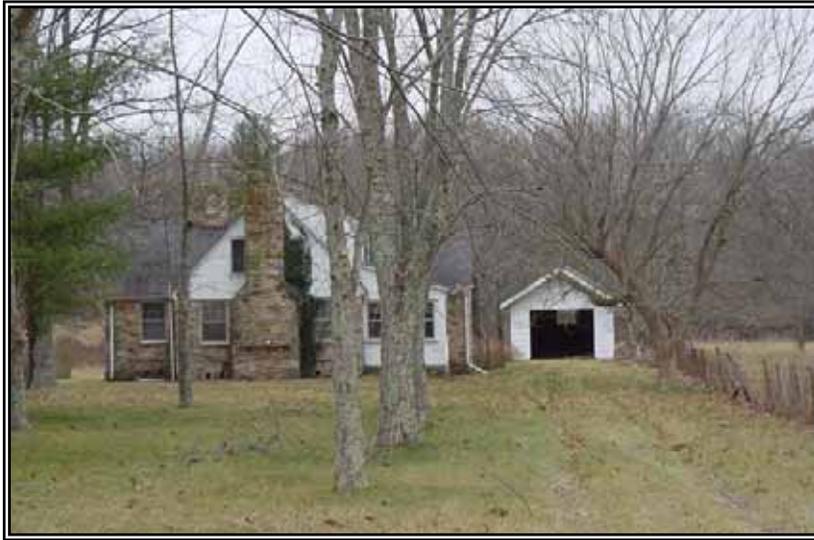


Figure 6: Example of a Homestead House, located within the historic district, that has not had extensive exterior alterations.

Figure 7: Example of outbuildings that date to the original Homestead period. These buildings were part of the Eldridge Farm that was a contributing farmstead in the historic district. The buildings on the property were razed when a bank branch was built within the historic district in 2005.



Figure 8: Homestead Tower Museum is located at the triangle intersection of State Route 28 and State Route 68 which has been the focus of the CRT. Note the modern landscaping surrounding the building that would not have fit with the rural development during the New Deal.



Figure 9: View of the historic triangle at State Route 28 and State Route 68 from the Tower Museum. In TDOT's proposed intersection improvements, a new triangle will be formed to the right of the photograph that will have the capacity to carry more vehicular traffic. Note the modern buildings located within the historic district. The building on the far right of the photograph is original to the historic district but has been too altered to be considered a contributing structure.

Effects to Cumberland Homesteads Historic District

The proposed project begins north of State Route 68 and State Route 28 intersection to Cleveland Street in Crossville. The proposed typical section will consist of four traffic lanes, a continuous turn lane, shoulders with curb-and-gutter and utility strips within a 104-foot right-of-way. As part of a re-evaluation of the proposed project, TDOT focused on design modifications of the triangle intersection at State Route 28 and State Route 68 within the Cumberland Homesteads Historic District.

Figure 11 indicates the areas in the historic district that retain little or no integrity. Figure 12 indicates the proposed project in relation to the National Register listed Cumberland Homesteads Historic District. Figure 13 contains preliminary plans for the CRT's preferred alternative. Figure 14 is an artist's rendering of the preferred alternative in relation to the buildings located near the triangle intersection. Figures 15-21 show preliminary sketches for the triangle intersection proposed by the CRT. These alternatives were studied but not recommended.

Documentation of Effect

Pursuant to 36 CFR 800.5, TDOT applied the Criteria of Effect as found in 36 CFR 800.9 to the proposed interchange improvement. It is the opinion of TDOT that the proposed project will have an adverse effect the Cumberland Homesteads Historic District. The proposed project is state-funded with only federal permits required; therefore, Section 4(f) of the U.S. Department of Transportation Act of 1966 does not apply.

Section 106:

36CFR 800.5 (a) Apply Criteria of Adverse Effect

In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the Agency Official shall apply the criteria of adverse effect to historic properties within the area of potential effect. The Agency Official shall consider any views concerning such effects, which have been provided by consulting parties and the public.

(a) (1) Criteria of Adverse Effect

An adverse effect is found when an undertaking may alter, directly or indirectly, any of 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 reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(b) (2) Examples of Adverse Effects

An undertaking is considered to have an Adverse Effect when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects on historic properties include, but are not limited to:

- (i). Physical destruction of or damage to all or part of the property;

TDOT's proposed project would widen the existing State Route 28 (U.S. 127) corridor south of Crossville to (and including) the intersection of State Route 28 and State Route 68. The proposed typical section will consist of four traffic lanes, a continuous turn lane, shoulders with curb-and-gutter and utility strips within a 104-foot right-of-way. The current roadway is a two-lane roadway within a 100 to 120 foot right-of-way. The Cumberland Homesteads Historic District contains over 10,000 acres of land south of Crossville. The National Register boundary begins just south of Crossville near the corporate boundary for the city. State Route 28 (U.S. 127) extends southward through the historic district. Although the project will be built on the existing alignment, will maintain historic road patterns, and will not result in the loss of any contributing buildings, it will require right-of-way to be taken from within the historic district boundaries.

In addition, the proposed project would result in the alteration of the triangle intersection where State Route 28 and State Route 68 meet. TDOT re-evaluated the proposed project after the University of Tennessee Transportation Center and public comment recommended changes to the proposed project. As a result, a CRT (CRT) was established to help find an intersection alternative that best meets the needs of local residents, historic interests, and the motoring public. Although the triangle intersections do not appear in the inventory of contributing design elements of the historic district within the National Register nomination, the physical destruction of the current triangle intersection and the resulting replacement of the intersection with a new triangle meeting current design standards on a different alignment adversely affects the historic district. Therefore, it is the opinion of TDOT that there will be an adverse effect to the historic district under this criterion.

- (ii) Removal of the property from its historic location

The proposed project would not result in the removal of a contributing property from its historic location. However, the proposed project would result in the alteration of the triangle intersection where State Route 28 and State Route 68 meet. TDOT re-evaluated the proposed project after the University of Tennessee Transportation

Center and public comment recommended changes to the proposed project. As a result, a CRT (CRT) was established to help find an intersection alternative that best meets the needs of local residents, historic interests, and the motoring public. Although the triangle intersections do not appear in the inventory of contributing design elements of the historic district within the National Register nomination, the removal of the current triangle intersection and the replacement of the intersection with a new triangle that will meet current design standards constitutes an adverse effect to the historic district.

- (iii) Change of the character of the property's use or physical features within the property's setting that contribute to its historic significance;

Cumberland Homesteads Historic District was listed in the National Register of Historic Places in 1988 under Criterion A for its significance in social history, community planning and development and agriculture and under Criterion C for its architectural significance. The historic district encompasses over 10,000 acres of land south of Crossville in a rapidly developing rural area that is characterized by modern residential housing and subdivisions and commercial buildings. The State Route 28 (U.S. 127) corridor contains the majority of this urban/suburban growth within the historic district. As a result, original homestead properties located along the State Route 28 (U.S. 127) corridor are sparsely situated and have often been removed, subdivided, or incorporated into new development. In many instances, the original homestead houses have been severely altered through efforts to modernize the modest dwellings with large additions and interior alterations that make them more livable by late-twentieth-century standards. In addition, most original homestead properties along this corridor no longer support agricultural endeavors as originally envisioned by community planners which has also led to the alteration of the rural historic landscape through the removal of farm outbuildings that served the property during its period of significance.

As part of a wide-ranging study performed by a TDOT consultant in consultation with the TN-SHPO, guidelines were developed to aid TDOT historians and their consultants in re-evaluating properties that have been altered severely since listing in the National Register of Historic Places. As part of this documentation, the consultant completed a case study using the guidelines laid out by the re-evaluation document. The Cumberland Homesteads Historic District was chosen as the case study due to its large size and the rapid changes that have occurred within the rural district since it was listed in the National Register. The consultant's purpose for studying the historic district "was to identify and map the location of the Homestead houses and to locate modern subdivision development and infill housing within the historic district." The consultant conducted a windshield survey to accomplish the overall goal of the project. Given the large-scale changes that have occurred within the historic district, the consultant tried six different methods to map and identify Homestead Houses. (A copy of the detailed study can be found in Appendix E).

The consultant identified approximately 210 structures that were recognizable Homestead Houses out of the 251 inventoried in the National Register nomination. The consultant did not study each individual Homestead property to determine if they were intact. The consultant stated “many of the Homestead houses did retain farm buildings that appear to date to the time of the period of significance of the Homestead community. Some had what appears to be their original, intact parcels of land. However, the district provides little indication of its subsistence farming history, primarily because of the extensive subdividing of the Homestead parcels and because of the changing use of the area to a vacation/retirement destination and the fact that the newcomers generally do not farm.” The consultant also identified community planning features that were indicative of the Homestead including roadway features, woodlands, and other Homestead properties. The consultant concluded that the historic district retains many intact Homestead properties and design features that characterize the rural farming community. Pockets that best depict the historic character of the historic district include

- State Route 68 (historically Grassy Cove Road) from just north of Turkey Oak Road to south of Buck Creek Road
- Open Range Road
- Huckleberry Lane
- State Route 419/Pigeon Ridge Road
- Deep Draw Road between Byrd Branch and about ½ mile east of Sawmill Road
- South Main Street/U.S. 127

The consultant also found that subdivisions, commercial and industrial development, and modern churches have encroached into the historic district and compromised the integrity of the State Route 28 (U.S. 127) corridor “north of its intersection with State Route 68, State Route 68 from US 127 east to the vicinity of its intersection with Deep Draw Road, Deep Draw Road between US 127 and

Highland Lane, and Highland Lane north to the north end of the Highland View Subdivision.” See Figure 11 for locations.

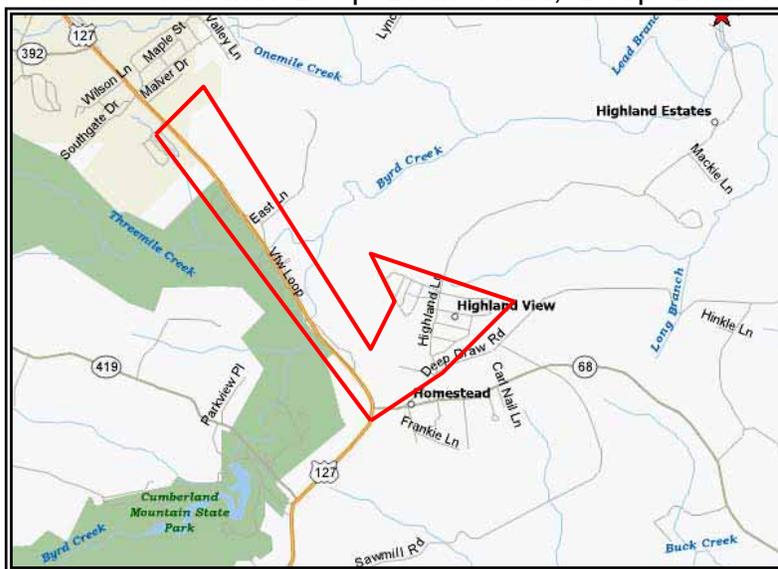


Figure 11: Map taken from the consultant’s re-evaluation of the historic district indicating the area that retains no integrity.

The rapid growth within the historic district in the proposed project area detracts from the community plan created by William Macy Stanton during the New Deal era. The Homesteads was designed to be a self-sufficient rural farming community characterized by small farms, collective industrial enterprises, and a well-planned roadway system. With the introduction of urban/suburban development and the alterations to original Homestead Houses along the State Route 28 (U.S. 127) corridor, the setting no longer contributes to the National Register significance of the historic district. Therefore in the opinion of TDOT, the proposed project would not adversely impact the historic district under this criterion.

- (iv) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;

Cumberland Homesteads Historic District was listed in the National Register of Historic Places in 1988 under Criterion A for its significance in social history, community planning and development and agriculture and under Criterion C for its architectural significance. The historic district encompasses over 10,000 acres of land south of Crossville in a rapidly developing rural area that is characterized by modern residential housing and subdivisions and commercial buildings. The State Route 28 (U.S. 127) corridor contains the majority of this urban/suburban growth within the historic district. As a result, original homestead properties located along the State Route 28 (U.S. 127) corridor are sparsely situated and have often been removed, subdivided, or incorporated into new development. In many instances, the original homestead houses have been severely altered through efforts to modernize the modest dwellings with large additions and interior alterations that make them more livable by late-twentieth-century standards. In addition, most original homestead properties along this corridor no longer support agricultural endeavors as originally envisioned by community planners which has also led to the alteration of the rural historic landscape through the removal of farm outbuildings that served the property during its period of significance.

The State Route 28 (U.S. 127) corridor is located in an essentially urban/suburban area of the Cumberland Homesteads Historic District that no longer retains its integrity under the National Register Criteria for which the district was listed. Although there are pockets within the over 10,000 acre historic district that retain their integrity they are not located along the project corridor.

In 1997, a State Environmental and Location Study report was prepared by the Environmental Planning Office. A section of that report was devoted to the air and noise study performed on most road projects. The report stated:

Air and Noise Impacts

No substantial increase in air quality or noise level impacts to sensitive receptors is anticipated as a result of this project.

Noise abatement measures such as noise barriers, traffic management measures, and alteration of horizontal or vertical alignment were considered for this project. These measures were found to be unreasonable and infeasible because of the scattered number of residences and because the roadway is access uncontrolled. For these reasons, it is unlikely that any form of noise abatement will be incorporated into the design of this project.

Therefore, it is the opinion of TDOT that the proposed project would not adversely impact the historic district relating to the introduction of audible or atmospheric effects that are out of character with the property's current setting.

- (v) Neglect of a property which causes its deterioration, except where such neglect or deterioration are recognized qualities or a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and

The property would not come under the jurisdiction of TDOT or other federal permitting agencies during the course of the project and thus this does not apply.

Therefore, in the opinion of TDOT the proposed improvements will have an adverse effect to the National Register listed Cumberland Homesteads Historic District.

Resolution of Adverse Effects

Pursuant to 36 CFR 800.6, TDOT has consulted with the TN-SHPO and other interested parties to resolve the adverse effect caused by the proposed project. This consultation process began in the 1990s with TDOT historians and TN-SHPO staff field reviewing the project to determine the least harmful alternatives and continues to the present time with the CRT using Context Sensitive Design principles to help determine the alignment of the triangle intersection where State Route 28 (U.S. 127) and State Route 68 intersect. In addition, after choosing the alignment for the triangle intersection, an enhancements committee will be formed in order to determine the type of aesthetic treatments used to mitigate the adverse effect to the historic district.



Figure 12: Historic rendering of the Triangle Intersection from the Library of Congress Website. The triangle itself and the area surrounding it have been altered since the 1930s including the addition of trees and wooden highway markers to the grassy triangle, and modern buildings have sprung up adjacent to the triangle.

As noted previously in the Project History section of this report, the CRT included local officials, residents, roadway users, and representative from the TN-SHPO and federal permitting agencies. A wide variety of interests were represented and the preferred alternative was chosen from those studied and reviewed by the CRT. Given that the need for the roadway widening project was already firmly established, the CRT was charged with finding alternatives at the triangle intersection of State Route 28 (U.S. 127) and State Route 68 near the historic water tower and Homesteads school. The CRT evaluated a variety of alternatives in an effort to retain as much of the triangle intersection as possible while keeping as many of the historic buildings as possible.

Alternatives Considered

Preferred Alternative

The preferred alternative, designated “D-modified,” has the following features:

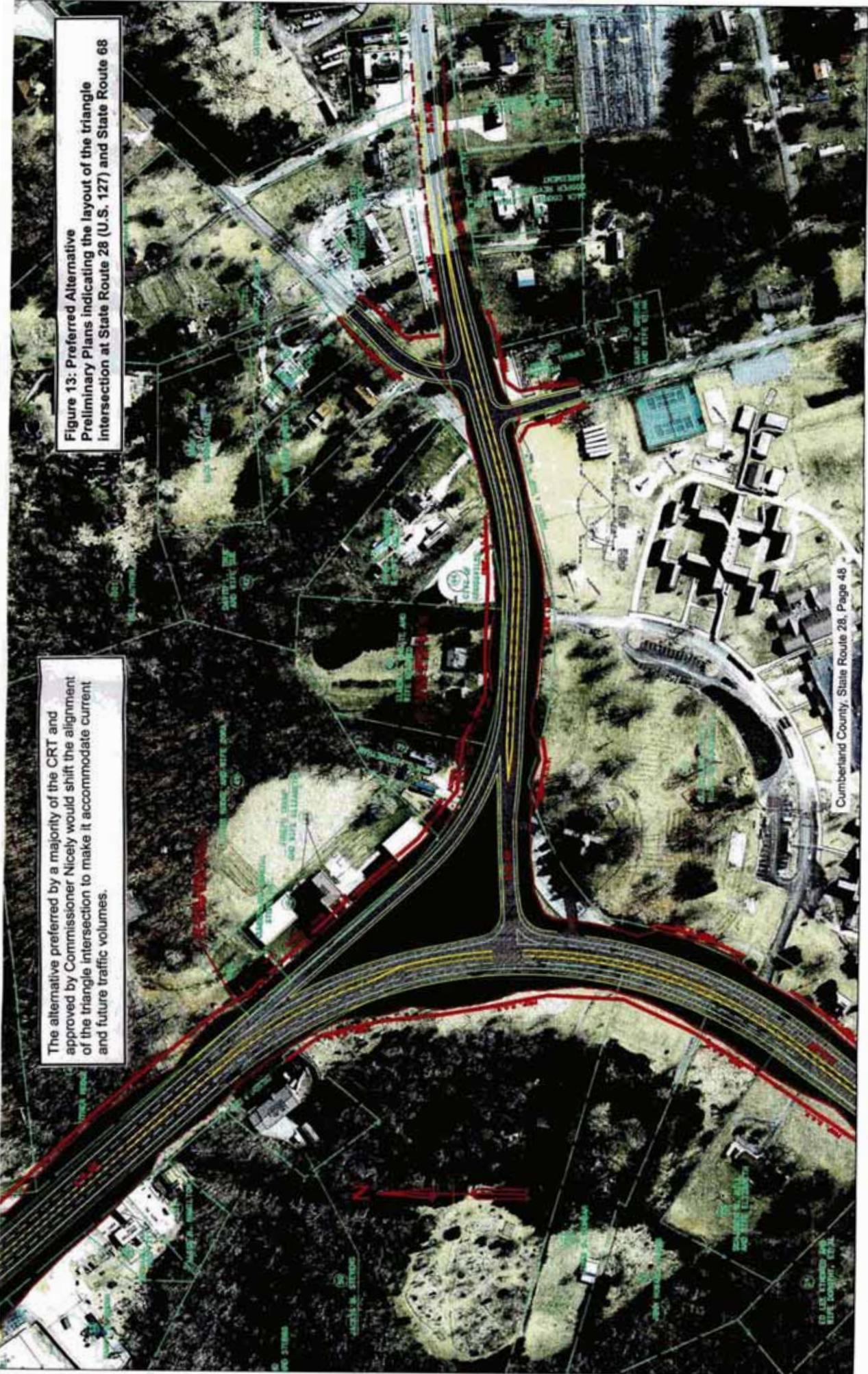
- State Route 68 intersects with State Route 28 (U.S. 127) at 90 degrees to tangent of the curve on State Route 28 (U.S. 127)
- State Route 68 westbound will be free flow and become a second lane to State Route 28 (U.S. 127) northbound

- State Route 28 (U.S. 127) southbound will have one left turn lane to State Route 68 eastbound
- State Route 28 (U.S. 127) northbound right lane will become a right turn lane to eastbound State Route 68 and the lane will drop at the intersection
- The triangle will be rehabilitated to approximately the current condition with landscaping typical of the 1930s Cumberland Plateau
- Shoulder paving will be minimized to minimize the apparent footprint
- Continue to preserve the triangle and minimize the footprint wherever possible

The CRT also recommended that a smaller “Enhancement Committee” should be formed in order to coordinate historic, aesthetic, and landscape treatments for the project. At the present time, the consultant is working with TDOT, local officials, and the CRT to build a membership that includes community leaders, citizens, a landscape architect, and TDOT and TN-SHPO representatives. This enhancement committee will focus solely on the triangle intersection area and will provide TDOT’s commissioner with their recommendations that both blend with the historic context of the Homestead and enhance the area surrounding the intersection of State Route 28 (U.S. 127) and State Route 68. Enhancement committee members have been selected and approved by TDOT and the first meeting has been scheduled for May 2006.

The alternative preferred by a majority of the CRT and approved by Commissioner Nicely would shift the alignment of the triangle intersection to make it accommodate current and future traffic volumes.

Figure 13: Preferred Alternative Preliminary Plans indicating the layout of the triangle intersection at State Route 28 (U.S. 127) and State Route 68



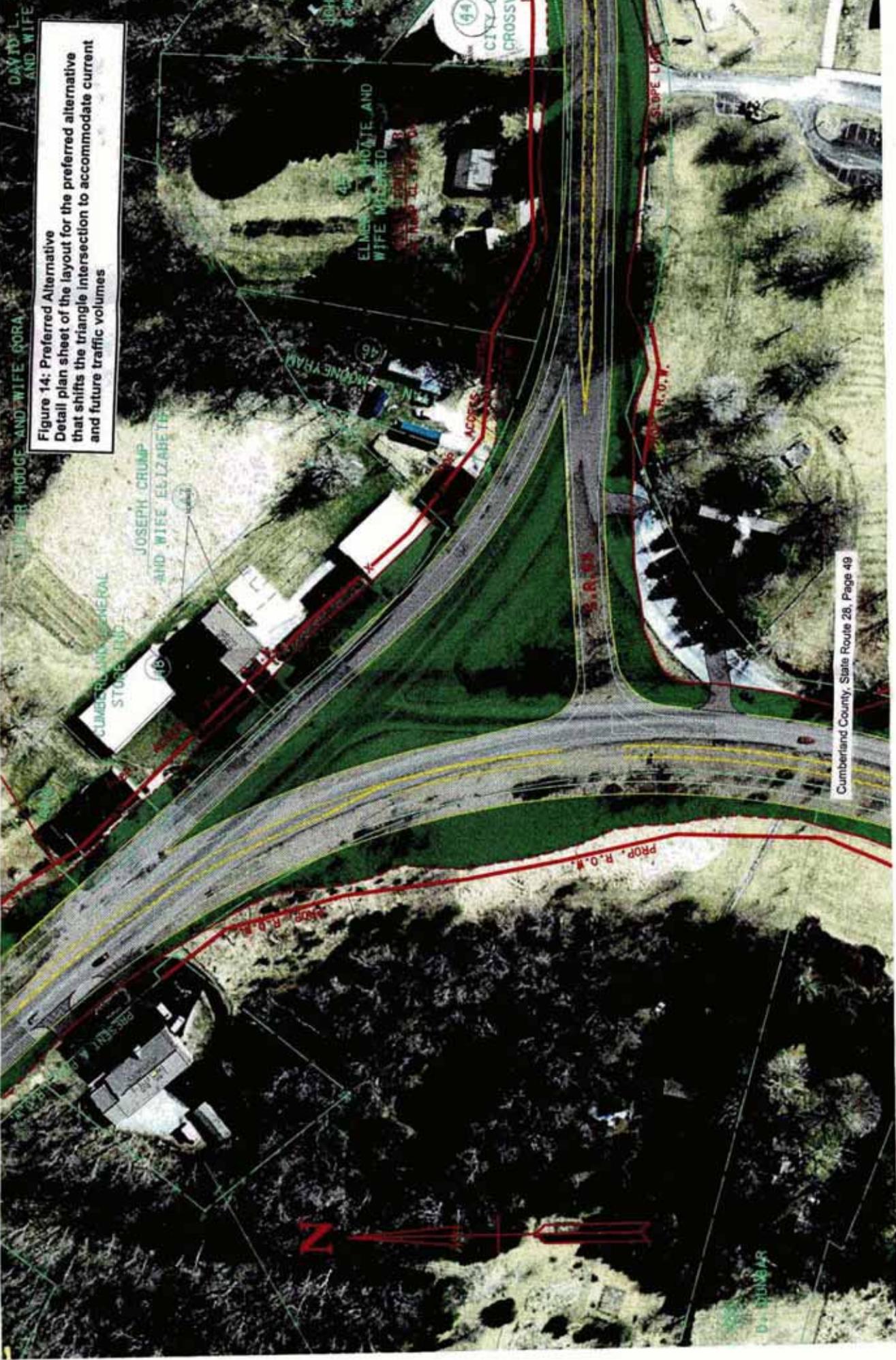


Figure 14: Preferred Alternative
Detail plan sheet of the layout for the preferred alternative
that shifts the triangle intersection to accommodate current
and future traffic volumes

Alternatives Considered but Not Recommended

Alternative A: This alternative provides the through movement from U.S. 127 (SR 28). State Route 68 intersects U.S. 127 north of the Tower Triangle. State Route 68 circles north of the Tower Triangle and reconnects with existing State Route 68 near Deep Draw Road. Access to the Tower and School from relocated U.S. 127 is by the proposed new drive to the west of existing U.S. 127 School entrance. Access to the Tower and School from relocated S.R. 68 is by the proposed new drive north of the east corner of the existing triangle. This alternative was presented at a public meeting on June 24, 2004. Figure 15 indicates the layout of this alternative.

Alternative B: This alternative is similar to Alternative A except the intersection moves closer to Crossville, S.R. 68 moves farther away from the Tower Triangle and S.R. 68 reconnects with the existing S.R. 68 approximately 1000-feet east of Deep Draw Road. Access to the Tower and School from relocated U.S. 127 is by the proposed new drive to the west of existing U.S. 127 School entrance. Access to the Tower and School from relocated S.R. 68 is by Deep Draw Road to existing S.R. 68. This alternative was presented at a public meeting on June 24, 2004. Figure 16 indicates the layout of this alternative.

Alternative C: "C" provides the through movement of S.R. 68. U.S. 127 (S.R. 28) intersects S.R. 68 just northwest of the Tower Triangle and curves into existing U.S. 127 (S.R. 28) approximately 1000-feet south of the Homestead Elementary School Entrance. Access to the Tower and School from relocated U.S. 127 is by the proposed new drive to the west of existing U.S. 127 School entrance. School exit to S.R. 68 is at the existing location. This alternative was also presented to the public at a meeting held on June 24, 2004. Figure 17 indicates the layout of this alternative.

Alternative D: This alternative provides for the through movement of U.S. 127 (S.R. 28). State Route 68 intersects U.S. 127 in the middle of the Tower Triangle and immediately reconnects with Existing S.R. 68 just east of the Tower Triangle. Access to the School is at the existing location. Access to the Tower is from the proposed new driveways from relocated U.S. 127 and relocated S.R. 68. The School exit to S.R. 68 is at the existing location. This alternative was also presented at the June 24, 2004 public meeting. Figure 18 indicates the layout of this alternative.

Alternative E: Alternative E would bypass the existing triangle intersection by shifting the alignment of State Route 68 south of the current alignment. The bypass would intersect with State Route 28 southwest of the School and the alignment would continue on new location to the northwest and would reconnect with the existing State Route 28 (U.S. 127) north of the existing triangle. Access to the Tower and School would continue to be from the

existing State Route 28 and State Route 68. Figure 19 indicates the layout of this alternative.

Alternative F: This alternative would replace the existing triangle with a roundabout. Traffic would flow around the circle with State Route 68 and State Route 28 (U.S. 127) located on essentially the same alignment. Access to the School would remain from State Route 28 and State Route 68; however there would be no access and no parking at the Homestead Tower. Figure 20 indicates the layout of this alternative.

Alternative G: "G" would provide a T-intersection through the existing triangle just west of the Homestead Tower. The alignment of State Route 68 and State Route 28 would remain on essentially the same alignment. Access to the School would remain from State Route 28 and State Route 68; however there would be no access or parking at the Homestead Tower. Figure 21 indicates the layout of this alternative.

Figure 15: Alternative A

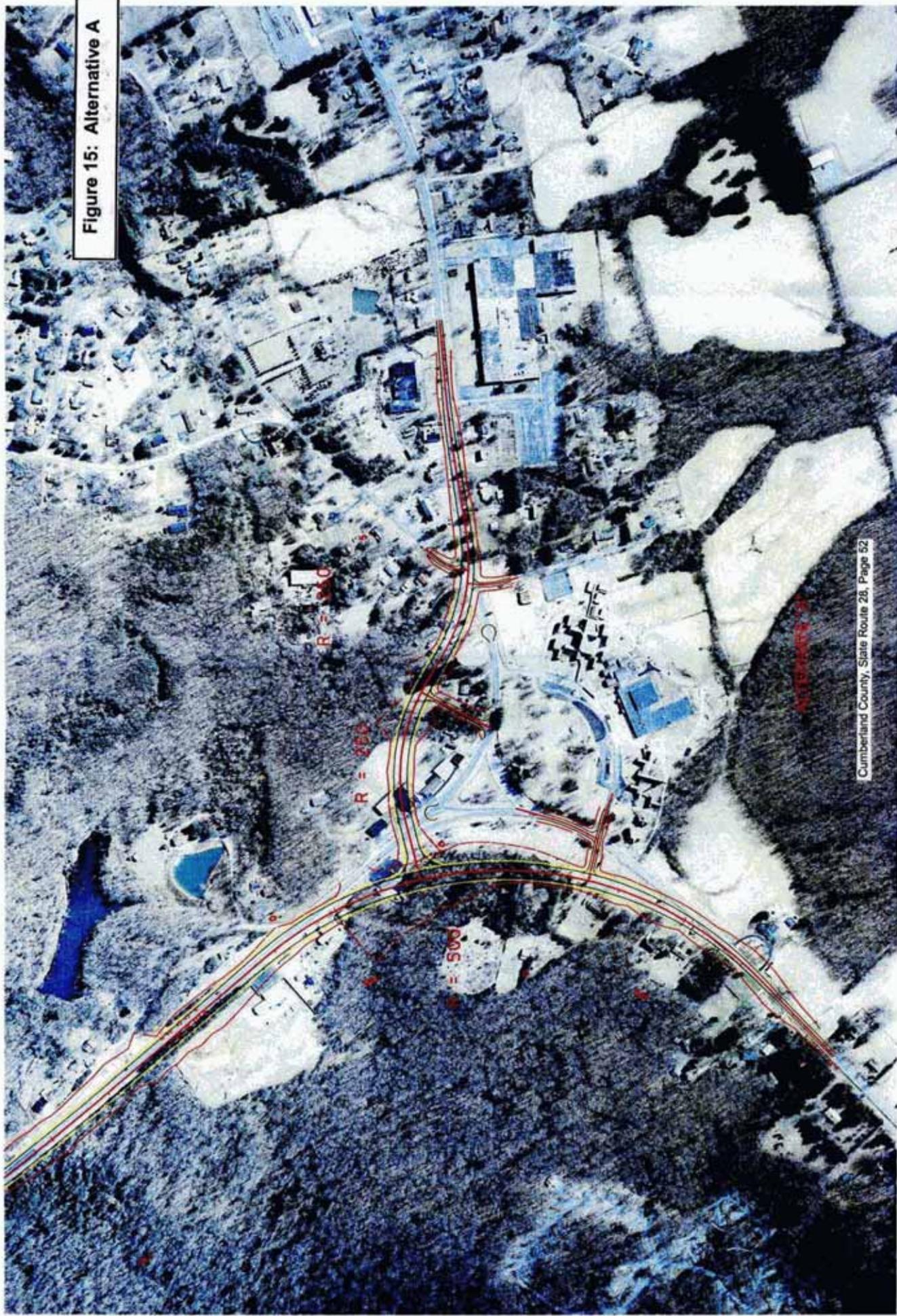


Figure 16: Alternative B



Figure 17: Alternative C



Figure 18: Alternative D



Figure 21: Alternative G



Conclusions

The Tennessee Department of Transportation (TDOT) is proposing to improve State Route 28 (U.S. 127) from State Route 68 to Cleveland Street in Crossville in Cumberland County, Tennessee. The proposed project begins north of State Route 68 and State Route 28 intersection to Cleveland Street in Crossville. The proposed typical section will consist of four traffic lanes, a continuous turn lane, shoulders with curb-and-gutter and utility strips within a 104-foot right-of-way.

TDOT historians identified one National Register listed historic district, Cumberland Homesteads Historic District. Under Section 106, as defined in 36 CFR 800.5, the proposed project would adversely effect to the National Register listed historic district.

Since this project is state funded, Section 4(f) of the U.S. Department of Transportation Act of 1966 does not apply.

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SECTION 106 REVIEW, NATIONAL HISTORIC PRESERVATION ACT OF 1966

Section 106 of the National Historic Preservation Act requires that Federal agencies consider what effects their actions and/or actions they may assist, permit, or license, may have on historic properties, and that they give the Advisory Council on Historic Preservation (Council) a “reasonable opportunity to comment” on such actions. The Council is an independent Federal agency. Its role in the review of actions under Section 106 is to encourage agencies to consider, and where feasible, adopt measures that will preserve historic properties that would otherwise be damaged or destroyed. The Council’s regulations, entitled “Protection of Historic Properties” (36 CFR Part 800) govern the Section 106 process. The Council does not have the authority to require agencies to halt or abandon projects that will affect historic properties.

Section 106 applies to properties that have been listed in the National Register of Historic Places (NRHP), properties that have been determined to be eligible for inclusion in the NRHP, and properties that may be eligible but have not yet been evaluated. If a property has not yet been nominated to the NRHP or determined eligible for inclusion, it is the responsibility of the Federal agency involved to ascertain its eligibility.

The Council’s regulations are set forth in a process consisting of four basic steps which are as follows:

1. **Initiate Section 106 Process:** The Federal agency responsible for the action establishes the undertaking, determines whether the undertaking has the potential to affect historic properties (i.e., properties listed in or eligible for listing in the National Register of Historic Places), and identifies the appropriate State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO). At this time, the agency plans to involve the public and identify other consulting parties.
2. **Identify Historic Properties:** If the agency’s undertaking has the potential to affect historic properties, the agency determines the scope of appropriate identification efforts and proceeds to identify historic properties within the area of potential effects. Identification involves assessing the adequacy of existing survey data, inventories, and other information on the area’s historic properties. This process may also include conducting further studies as necessary and consulting with the SHPO/THPO, consulting parties, local governments, and other interested parties. If properties are discovered that may be eligible for the National Register, but have not been listed or determined eligible for listing, the agency consults with the SHPO/THPO and, if needed, the Keeper of the National Register to determine the eligibility status of the property.
3. **Assess Adverse Effects:** The agency, in consultation with the SHPO/THPO, assesses the potential effects to historic properties affected by the undertaking. The agency at this time will determine that the action will have “no adverse effect” or an “adverse effect” on historic properties. Consulting parties and interested members of the public are informed of these findings.

The regulations provide specific criteria for determining whether an action will have an effect, and whether that effect will be adverse. Generally, if the action may alter the characteristics that make a property eligible for the National Register, it is recognized that the undertaking will have an effect. If those alterations may be detrimental to the property’s characteristics, including relevant qualities of the property’s environment or use, the effects are recognized as “adverse.”

4. **Resolve Adverse Effects:** The agency consults with the SHPO/THPO and others, including consulting parties and members of the public. The Council may choose to participate in consultation, particularly under circumstances where there are substantial impacts to historic properties, when a case presents important questions about interpretation, or if there is the potential for procedural problems. Consultation usually results in a Memorandum of Agreement (MOA).

If agreement cannot be reached, the agency, SHPO/THPO, or Council may terminate consultation. If the SHPO/THPO terminates consultation, the agency and the Council may conclude the MOA without SHPO/THPO involvement. If the SHPO/THPO terminates consultation and the undertaking is on or affecting historic properties on tribal lands, the Council must provide formal comments. The agency must request Council comments if no agreement can be reached.

**ELIGIBILITY CRITERIA OF THE
NATIONAL REGISTER OF HISTORIC PLACES
AS SET FORTH AT 36 CFR 60.4**

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- CRITERION A. that are associated with events that have made a significant contribution to the broad patterns of our history (history); or
- CRITERION B. that are associated with the lives of persons significant in our past (person); or
- CRITERION C. that 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 (architecture); or
- CRITERION D. that have yielded, or may be likely to yield, information important in prehistory or history (archaeology).

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 National Register of Historic Places; however, such properties will qualify if they are integral parts of historic districts that do meet the criteria or if they fall within the following categories:

- EXCEPTION A. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- EXCEPTION 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
- EXCEPTION 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
- EXCEPTION 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
- EXCEPTION 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
- EXCEPTION F. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or
- EXCEPTION G. a property achieving significance within the past 50 years if it is of exceptional importance.

NATIONAL REGISTER OF HISTORIC PLACES

Summary Sheet Prepared by TDOT

What is the National Register of Historic Places? The National Register, maintained by the Keeper of the Register within the National Park Service, Department of Interior, is the nation's official list of districts, buildings, sites, structures, and objects significant in American history, architecture, archeology, engineering, and culture.

What are the benefits and restrictions of listing? In addition to honorific recognition, listing in the National Register results in the following benefits for historic properties:

- Section 106 provides for consideration of National Register listed or eligible properties in planning for Federal, federally licensed, and federally assisted projects;
- Eligibility for certain tax provisions for the certified rehabilitation of income-producing National Register structures such as commercial, industrial, or rental residential buildings;
- Consideration of historic values in the decision to issue a surface mining permit where coal is located in accordance with the Surface Mining Control Act of 1977; and
- Qualification of Federal grants for historic preservation, when funds are available.

Does National Register designation place any additional burdens or obligations on the property owner? Owners of private property listed in the National Register are free to maintain, manage, or dispose of their property as they choose, provided that no Federal moneys are involved.

How is a property nominated to the National Register? The first step is for the owner to contact the Tennessee State Historic Preservation Office (TN-SHPO), Clover Bottom Mansion, 2941 Lebanon Road, Nashville, TN 37243-0442; 615-532-1558. Ordinarily, private individuals (or paid consultants) prepare nomination forms. The TN-SHPO submits these nominations to a State Review Board, which meets three times a year. This body reviews the nominations and votes to recommend or deny National Register listing. If approved, the TN-SHPO submits the nomination to the Keeper of the Register in Washington, D.C. for consideration for listing. The Keeper's Office has 45 days to review the nomination, and its decision regarding National Register listing is final.

How long does the nomination process take? The process varies but typically takes between eight and twelve months.

CRITERIA OF ADVERSE EFFECT

Regulations codified at 36 CFR 800 require Federal agencies to assess their impacts to historic resources. The regulations provide specific criteria for determining whether an action will have an effect, and whether that effect will be adverse. These criteria are given below.

36 CFR 800.5 Assessment of Adverse Effects

(a) Apply Criteria of Adverse Effect. In consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified historic properties, the Agency Official shall apply the criteria of adverse effect to historic properties within the area of potential effects. The Agency Official shall consider any views concerning such effects which have been provided by consulting parties and the public.

(1) Criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of 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 reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(2) Examples of adverse effects. Adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access that is not consistent with the Secretary's Standards for the Treatment of Historic Properties and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

APPENDIX D

PUBLIC PARTICIPATION



Sample Letter to Public

**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL DIVISION
505 DEADERICK STREET
SUITE 900, JAMES K. POLK BUILDING
NASHVILLE, TENNESSEE 37243-0349
615-741-3653**

March 10, 2005

SUBJECT: Architectural Assessment and Documentation of Effect for the proposed improvements to State Route 28 (U.S. 127) from State Route 68 to Cleveland Street, Crossville, Cumberland County, Tennessee

To Whom it May Concern:

The Tennessee Department of Transportation (TDOT) is proposing to improve State Route 28 (U.S. 127) from State Route 68 to Cleveland Street.

Pursuant to regulations set forth in "36 CFR 800: Protection of Historic Properties" cultural resource staff from TDOT surveyed the general project area in an attempt to identify National Register-included or eligible properties which could be impacted by the proposed project.

The enclosed report discusses TDOT's survey findings. You are receiving this report because TDOT has identified you as a Cumberland County party or individual with historic preservation interests. The Advisory Council on Historic Preservation Regulations specify that members of the public with interests in an undertaking and its effects on historic properties should be given reasonable opportunity to have an active role in the Section 106 process. As such, TDOT would like to give you the opportunity to participate in that process. If you feel that commenting on such projects is outside the interests of your organization, please notify me and I will remove your name from our list.

If you have any comments on historic issues related to this project, please write me. Federal regulations provide that you have thirty days to respond from the receipt of this letter.

Sincerely,

Tammy Allison Sellers, Historic Preservation Supervisor

Enclosure

cc: Mr. Herbert Harper, TN-SHPO

Letter to Local Government Official**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
THE ENVIRONMENTAL DIVISION**

SUITE 900, JAMES K. POLK BUILDING
505 Deaderick Street
NASHVILLE, TENNESSEE 37243-0334
(615) 741-5257
Fax (615) 741-1098

March 15, 2006

Brock Hill
Cumberland County Mayor
2 North Main Street, Suite 203
Crossville, TN 38555

RE: Section 106 Initial Coordination for Proposed Improvements to State Route 28 (U.S. 127) from State Route 686 to Cleveland Road in Crossville, Cumberland County, Tennessee

Dear Mr. Hill:

The Tennessee Department of Transportation (TDOT) in cooperation with the Federal Highway Administration is proposing to improve the above referenced project. Its location is shown on the enclosed map.

The 2001 Advisory Council on Historic Preservation regulations stipulate that TDOT invite local government representatives to participate in the historic review process as a consulting party. TDOT would like to invite you, as the local government official, to participate as a consulting party for the proposed project.

If you choose to participate as a consulting party, you will receive copies of TDOT's environmental reports and will be invited to attend project-related meetings between TDOT and the Tennessee State Historic Preservation Office (TN-SHPO), if any are held. As a consulting party, you should be prepared to attend any such meetings between TDOT and the TN-SHPO and provide a response to TDOT's reports in written form within 30 days upon receipt of the report. TDOT also wishes to seek your comments on the identification and evaluation of historic properties that the proposed project might impact.

If you would like to participate as a consulting party, please write to me at the above address. To facilitate our planning process, please respond within 30 days of receipt of this letter. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Martha Carver".

Martha Carver
Historic Preservation Program Manager

Enclosure
cc: Mr. Herbert Harper, TN-SHPO

Letter to Local Government Official

**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
THE ENVIRONMENTAL DIVISION**
SUITE 900, JAMES K. POLK BUILDING
505 Deaderick Street
NASHVILLE, TENNESSEE 37243-0334
(615) 741-5257
Fax (615) 741-1098

March 15, 2006

J. H. Graham, Mayor
City of Crossville
99 Municipal Avenue
Crossville, TN 38555

RE: Section 106 Initial Coordination for Proposed Improvements to State Route 28 (U.S. 127) from State Route 686 to Cleveland Road in Crossville, Cumberland County, Tennessee

Dear Mr. Graham:

The Tennessee Department of Transportation (TDOT) in cooperation with the Federal Highway Administration is proposing to improve the above referenced project. Its location is shown on the enclosed map.

The 2001 Advisory Council on Historic Preservation regulations stipulate that TDOT invite local government representatives to participate in the historic review process as a consulting party. TDOT would like to invite you, as the local government official, to participate as a consulting party for the proposed project.

If you choose to participate as a consulting party, you will receive copies of TDOT's environmental reports and will be invited to attend project-related meetings between TDOT and the Tennessee State Historic Preservation Office (TN-SHPO), if any are held. As a consulting party, you should be prepared to attend any such meetings between TDOT and the TN-SHPO and provide a response to TDOT's reports in written form within 30 days upon receipt of the report. TDOT also wishes to seek your comments on the identification and evaluation of historic properties that the proposed project might impact.

If you would like to participate as a consulting party, please write to me at the above address. To facilitate our planning process, please respond within 30 days of receipt of this letter. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Martha Carver".

Martha Carver
Historic Preservation Program Manager

Enclosure
cc: Mr. Herbert Harper, TN-SHPO

Sample Letter to Native Americans**STATE OF TENNESSEE
DEPARTMENT OF TRANSPORTATION
THE ENVIRONMENTAL DIVISION**

SUITE 900, JAMES K. POLK BUILDING
505 Deaderick Street
NASHVILLE, TENNESSEE 37243-0334
(615) 741-5257
Fax (615) 741-1098

March 15, 2006

SUBJECT: Section 106 Initial Coordination for Proposed Improvements to State Route 28 (U.S. 127) from State Route 68 to Cleveland Street in Crossville, Cumberland County, Tennessee

To Whom It May Concern:

The Tennessee Department of Transportation (TDOT) in cooperation with the Federal Highway Administration is in the planning stages of evaluating the above-referenced project for possible implementation. The location of the proposed project is shown on the enclosed map.

The 2001 Advisory Council on Historic Preservation regulations, 36 CFR 800, stipulate that Indian tribes that attach religious and cultural significance to properties that may be affected by an undertaking be invited to participate in the project review process as consulting parties. TDOT would like to invite you to participate as a consulting party for the proposed project. This letter is also TDOT's request for comments on the identification of properties in the project's area of potential effect that may be of religious and cultural significance to your tribe.

If you choose to participate as a consulting party on the above-referenced project, you will receive copies of cultural assessment reports that identify Native American related properties. You will also be invited to attend project-related meetings with FHWA, TDOT and the Tennessee State Historic Preservation Office (TN-SHPO), if any are held. We respectfully request written responses to project reports and other materials within thirty (30) days of receipt.

If you would like to participate as a consulting party, please respond to me via letter, telephone (615-741-5257), fax (615-741-1098) or E-mail (Gerald.Kline@state.tn.us). To facilitate our planning process, please respond within 30 days of receipt of this letter. If you do not respond, you will not receive reports related to this project unless you specifically request them at a later date. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Gerald Kline".

Gerald Kline
Transportation Specialist I
Archaeology Program Manager

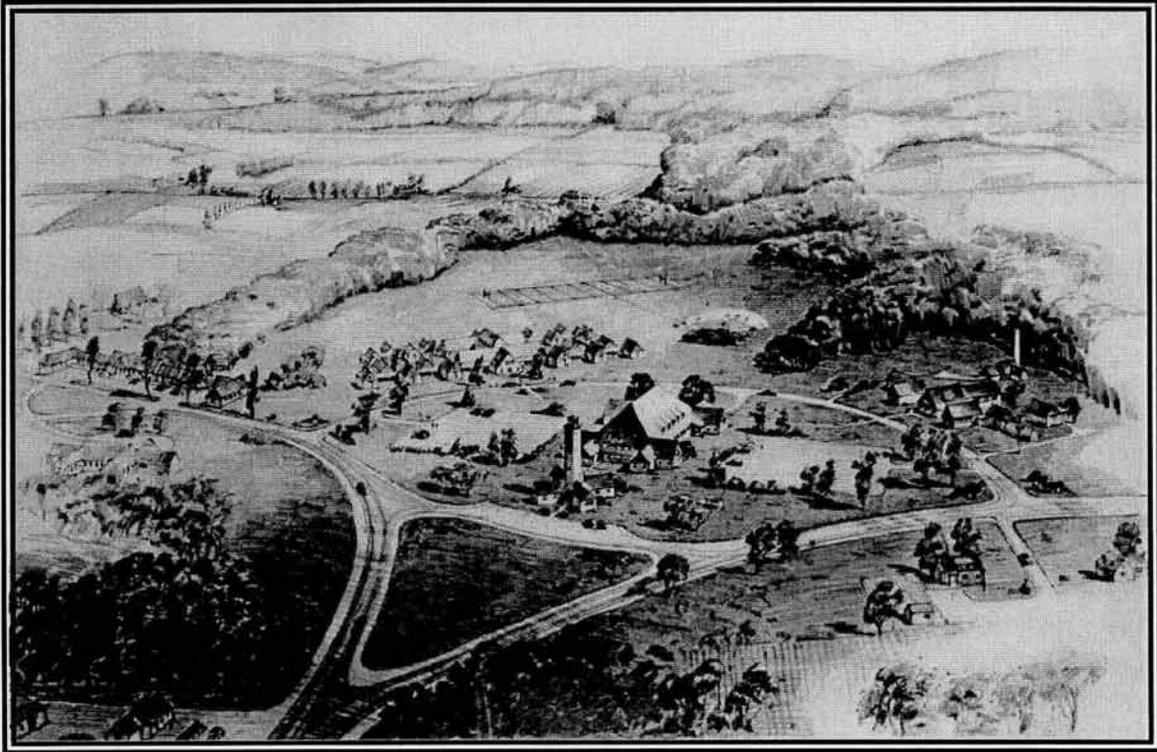
Enclosure

cc. Augustine Asbury, Alabama-Quassarte Tribal Town
Dr. Richard Allen, The Cherokee Nation
Tyler Howe, Eastern Band of Cherokee Indians
Charles D. Enyart, Eastern Shawnee Tribe of Oklahoma
Gary Bucktrot, Kialegee Tribal Town
Joyce Bear, Muscogee (Creek) Nation
Rebecca Hawkins, Shawnee Tribe

Lisa Stopp, United Keetoowah Band of Cherokee Indians

**APPENDIX E
RECONNAISSANCE SURVEY
CUMBERLAND HOMESTEADS
HSITORIC DISTRICT**

**RECONNAISSANCE SURVEY
CUMBERLAND HOMESTEADS HISTORIC DISTRICT
CROSSVILLE, CUMBERLAND COUNTY, TENNESSEE**



**"Community Center, Cumberland Homesteads, Crossville, Tennessee, Special Plans Division, Resettlement Administration"
(Current Intersection of US 127 and State Route 68)
From Library of Congress**

***COMPLETED AS A CASE STUDY FOR THE
PROJECT TO DEVELOP TDOT GUIDELINES FOR RE-EVALUATING
NATIONAL REGISTER-LISTED RESOURCES
ENCOUNTERED IN THE SECTION 106 PROCESS***

**Prepared for:
Tennessee Department of Transportation
Environmental Division**

**Prepared by:
Margaret Slater, AICP
Senior Professional Associate in Cultural Resources
Parsons Brinckerhoff
Nashville, Tennessee**

December 2004

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- A. December 2004 Windshield Survey Roster
- B. Tax Assessor's Records

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- 1. Historic District Map from National Register Nomination, Map 1
- 2. Aerial Photographs of Cumberland Homesteads Historic District (8-map set plus key map)
- 3. Property Maps showing location of Homestead and Non-Homestead Resources

1.0 INTRODUCTION

1.1 Background

The Tennessee Department of Transportation (TDOT) has contracted with Parsons Brinckerhoff (PB) to develop guidance for re-evaluating properties that are listed in the National Register of Historic Places (NRHP) and that are encountered in their surveys conducted pursuant to Section 106 of the National Historic Preservation Act (NHPA). The guidelines were developed by TDOT in consultation with the State Historic Preservation Office (SHPO). In addition to producing a document that contained the guidelines, PB's scope of work for this project specified that a case study be completed.

The case study selected for this study involved the re-evaluation of the NRHP-listed Cumberland Homesteads Historic District, located in Cumberland County, Tennessee, just south of Crossville. The 10,250-acre district was listed in the NRHP in 1988 under NRHP Criteria A and C for its significance in Social History, Community Planning and Development, Agriculture and Architecture. According to the NRHP nomination, "Cumberland Homesteads is a planned New Deal community built by the Division of Subsistence Homesteads between 1934 and 1938. . . [it is] of national significance as an intact planned community representative of an important New Deal movement to aid destitute families." Its period of significance is from 1934 – 1941. The area originally encompassed 27,802 acres and had 251 farm homesteads that were built on lots ranging from 10 to 160 acres. Both the community plan and the houses were designed by William Macy Stanton. The farmstead houses, community buildings and bridges in the district were built of local, Crab Orchard stone.

The Cumberland Homesteads Historic District is on Tennessee's Cumberland Plateau in an area of rolling hills, hollows and deep ravines. The area has a view of the mountains to the south and east. Creeks that bisect the district include Daddys Creek, Three-Mile Creek, Byrd Creek and Long Hollow Branch. In the middle of the district is the Cumberland Mountain State Park, a Civilian Conservation Corps' project, built in conjunction with the Cumberland Homesteads. Figure 1 shows the general location of the district.

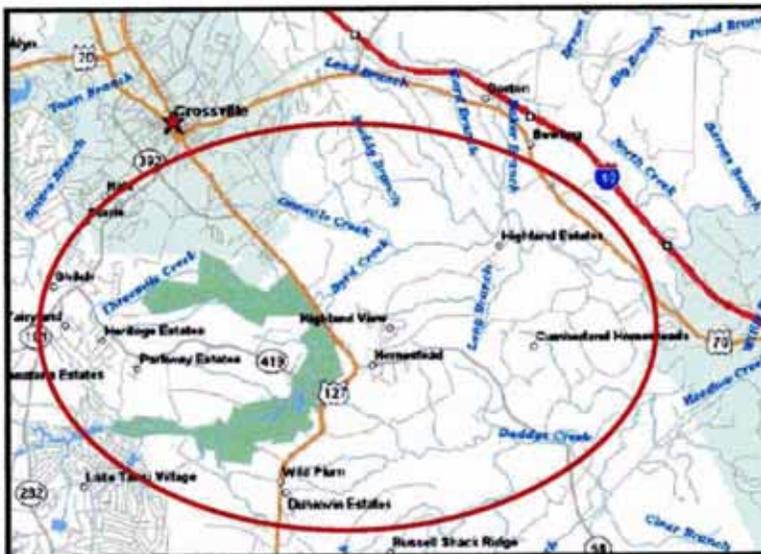


Figure 1.
General Location Map.
Cumberland Homesteads
Historic District

1.2 Purpose of the Re-Evaluation

Since the district was listed in the NRHP in 1988, the Crossville area and its environs have undergone a transformation. The area is rapidly developing as a year-round retirement and seasonal vacation destination. The increase in the area's desirability for these purposes is continuing to change Crossville and surrounding areas, including the area south of Crossville encompassed by the Cumberland Homesteads Historic District. The purpose of this re-evaluation of the district is to identify any major changes that have occurred since 1988 and to provide this information to:

1. TDOT: for use in current or future roadway planning; and
2. Historians: for the development of a driving tour of the district or for other historic purposes.

2.0 METHODOLOGY

The scope of work for PB's re-evaluation of the Cumberland Homesteads Historic District involved the conduct of a windshield survey, i.e., an overview survey of the district, not an in-depth evaluation. The main purpose of this study is to identify and map the locations of the Homestead houses, to point out concentrations of Homestead homes (i.e., areas of the district that are the most intact) and to locate modern subdivision development and infill housing within the district boundaries. This task was accomplished through a windshield survey, comprised of several drive-throughs of the district. During the drive-throughs, original Homestead buildings were located on aerial photographs and a roster was completed that recorded addresses and whether there was a Homestead building or modern building at each address. Outbuildings were not included in the re-survey. The buildings in the Cumberland Mountain State Park were also not included in the re-survey.

Below is a summary of the successful and not-so-successful attempts to gather the desired data:

1. Utilize NRHP Nomination Maps: We began the windshield survey using Map 1 from the NRHP nomination for our field recordation, the old Homestead Plan with the original Homestead buildings that were extant in 1988 marked on it. We had planned on locating Homestead buildings and modern buildings on this map. This map, however, was not usable for field work as only the Homestead buildings are shown on it and the lots have been subdivided many times. It was near impossible to figure out locations of both old and new buildings. A copy of Map 1 from the NRHP nomination, showing the NRHP boundaries and general location of Homestead houses surveyed in 1988, is shown in Figure 2. A full-sized version of this map is included as Attachment 1.

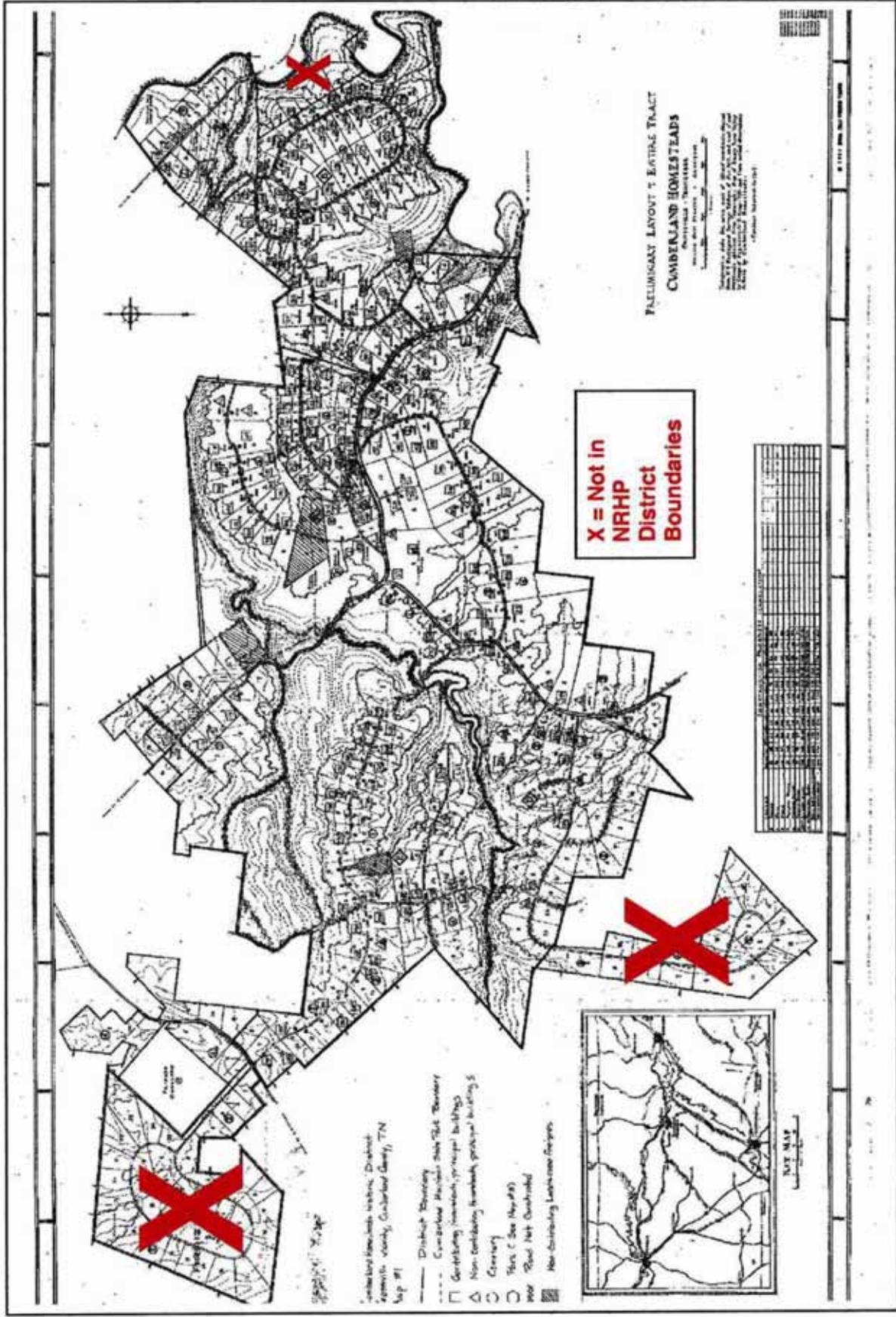


Figure 2. Map 1 from NRHP Nomination, showing NRHP boundaries and general location of Homestead houses.

2. Property Maps: We then obtained property maps from the Tax Assessor's Office in Crossville, taped them together and attempted to conduct the windshield survey using those maps. This method was also not successful, as these maps did not indicate the location of buildings on the lots and the subdivision pattern is very irregular. That made figuring out which lot buildings stood on very difficult. We put a halt to this because it was not working.
3. Roster of Addresses: The inventory in the NRHP nomination was done at a time when the properties in the district had no street addresses, so we could not tie the description in the inventory to the mapped property. In addition, only Homestead properties were included in the NRHP inventory, so we could not tell which non-historic houses were there when the nomination was completed and which had been built since then.

We decided to undertake a roster of addresses. This roster is in Appendix A to this report. On the roster, we recorded whether the primary building on each street-facing lot was a Homestead building or a modern building (Homestead houses that were not recognizable at all are included in the latter category). We hoped to use this data later to tie the addresses to parcels on property maps. Basically, if a building was recognizable as a Homestead building, we noted it as such. Our definition of "recognizable" was if we could tell from the road that a building was a Homestead house, irrespective of alterations and additions. A number of these houses have been altered and/or substantially expanded and likely were originally (in the 1988 nomination) or would now be considered as non-contributing under NRHP criteria. The NRHP nomination stated that if a Homestead house had an "obscured main façade" or was "dwarfed by additions," it would be considered non-contributing in the NRHP district.

We did an inventory of addresses on the district's *historic* roads, with the exception of Highway US 127 and the roadways in park. We also drove all of the non-historic roads and noted that the buildings on these roads were all non-contributing. The following historic roads were driven in the survey:

- Pigeon Ridge Road (State Route 419)
- S. Old Mail Road
- Coon Hollow Road
- Wild Plum Lane
- Valley Road (US 127 south of State Route 68/127 intersection)
- Sawmill Road
- County Seat Road (US 127 north of State Route 68/US 127 intersection)
- Grassy Cove Road (State Route 68)
- Highland Lane
- Deep Draw Road
- Turkey Oak Road
- Open Range Road
- Chestnut Lane
- Huckleberry Road
- Crab Orchard Road (US 70)
- Crab Apple Lane

A few problems that we encountered in developing the roster were:

- Some mail boxes had no numbers;
 - Some properties had no visible mailbox;
 - Some roads had all of the mailboxes on the same side of the road and often they were grouped—3 or 4 mailboxes in a group. It was hard to discern at times which address went with which property, particularly when some of the mailboxes had no addresses;
 - The traffic was bad on Highway 127 so we only recorded the contributing buildings; most of these had no mailbox. Traffic was also bad on State Route 68, but we think we got the addresses that were available.
4. *Mark-up aerials with buildings that were discernable as homestead buildings.* We had a master aerial and set of eight sheets at a larger scale. We used these aerials and drove the roads in the district that were historic and non-historic. We noted the locations of buildings on these aerials that were recognizable as Homestead houses. We visually and mentally noted the locations of the non-contributing buildings and we were later able to use this information, in conjunction with the roster, to map these buildings on property maps. On the aerials, we marked the locations of extant primary Homestead buildings that were *recognizable* as such. (See discussion in Roster of Addresses/no. 3 above regarding how we defined “recognizable.”). A copy of these aerials showing the locations of the Homestead houses is in Attachment 2.
 5. *Reconcile/Gather Additional Data:* Upon completion of the field work, we continued work at the Art Circle Public Library in Crossville. There, we attempted to look up addresses of businesses for which we were unable to obtain an address in the field. We also compared the number/location of Homestead homes in the roster to those mapped on the aerials and were able to reconcile this data.
 6. *Mapping buildings on Tax Assessor’s maps:* Using the State of Tennessee Comptroller of the Treasury’s Real Estate Assessment database that is available on line, we printed out the map and parcel numbers for properties on all of the historic streets in the district. I was able to print out this data either by road name and/or road name and map sheet number. A copy of this print-out is in Appendix B to this report.

I attempted then to tie the street addresses to a map and parcel number so that I could locate the Homestead houses and the non-Homestead houses (or homes that had been altered so much you could not tell that they were Homestead homes) as recorded in the roster. I mapped the properties that I could obtain a map and parcel number for and used the parcel numbers and roster to color code the tax assessor’s maps. A copy of the Tax Assessor’s map showing the location of the Homestead and non-Homestead houses and other primary buildings on lots within the district is in Attachment 3.

Problems encountered were:

- In the map and parcel list, many parcels were listed with no address. Consequently, for a number of addresses we recorded, we were unable to tie them to a parcel. Sometimes, I could make a logical assumption, but I cannot guarantee its accuracy 100%. I focused on trying to get all of the Homestead

properties mapped in the right location. Several of the non-Homestead properties are not recorded on the property maps, as I could not tie them to a parcel with any accuracy.

- Some lots were large or U-shaped and may/or may not have had both a Homestead building and a non-Homestead building on them.
- Because of the complications encountered in mapping some of the addresses, and the guesses made as to location of a few of them, the marked up property maps in Attachment 3 are primarily useful for their depiction of concentrations of Homestead houses and Non-Contributing/Non-Homestead properties, and for their depiction of subdivisions that were there in 1988 when the nomination was prepared and newer subdivisions. They are not all inclusive and are not 100 percent accurate.

3.0 FINDINGS

The conclusions derived from the field review and mapping of the field data are described below.

3.1 Historic Homestead Resources

3.1.1 Homestead Houses/Farmsteads

The NRHP nomination states that the Homestead “area originally consisted of 251 Farm Homesteads built in lots averaging from 10 to 160 acres with the average homestead consisting of 16 acres.” Figure 3 is a list of the homesteaders on each road at Cumberland Homestead around 1937.

The windshield survey identified around 210 houses¹ that were recognizable as Homestead houses. A typical Homestead house is shown in Figure 4, a notecard drawing by Doyle Vaden. The original houses were small, so many of them have been expanded, some minimally and some substantially. Many have small additions and/or enclosed porches, but many also have large additions that obscure most of their character-defining features. At times, the only feature that identified a house as a Homestead House was the stone chimney. In addition, as this area is changing from a quiet, sparsely populated rural area to an area that is a vacation and retirement destination, more and more houses are being enlarged and renovated. We were told that a very small number of original Homestead residents still reside in the district.

There is a difference of about 20 houses between the 1988 survey and this windshield survey. These 20 houses may have been razed or radically altered to a point that they were unrecognizable as Homestead houses in the windshield survey. Only a very cursory look was given to the intactness of the farmsteads. Many of the Homestead houses did retain farm buildings that appear to date to the time of the period of

¹ This number is approximate. The surveyors had questions of whether some buildings identified in the roster were Homestead homes. In addition, radically altered Homestead homes that lack character-defining features may not have been counted as a Homestead house in the roster.

Homesteaders about 1937 from a list compiled during Major Oliver's tenure as Project Manager

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| <p>GRASSY COVE ROAD:</p> <ol style="list-style-type: none"> 1 H. E. Johnston 2 Jesse Ernest 3 Alex Scarborough 4 W. Y. Keisling 5 Ervin Peavyhouse* 6 William Pruitt 7 Leston Hyder* 8 Roy L. Gossage 9 Rufus F. Cook 10 Walter Jernigan 11 Robert L. Tilley 12 H. C. Breeding 13 H. C. England 14 Billy Breeding 15 John Bell* 16 John S. Elmore 17 Ernest Dixon 18 J. T. Harris 19 T. W. Evans 20 Clyde Hedgecoth* 21 Roy Williams 22 Elmer R. Boles 23 U. C. Fulmer** 24 Frank Johnson 25 E. L. Bohannon 26 J. W. Smith 27 P. A. Ervin | <p>DEEP DRAW ROAD:</p> <ol style="list-style-type: none"> 4 Carson Pharris* 5 Everett Pippin* 6 Kenneth McBride 7 Lew Baker* 8 Wm. H. Fowle, Jr. 9 Zollie Kidwell* 10 Willard Beatty* 11 Gillis Allred* 12 Wm. L. Polson* 13 Clyde L. Cunningham 14 Alonzo Watley* 15 Albert Richards 16 Z. D. Pedigo* 17 Harry A. Wellions 18 Chester Parker 19 Robert Brannon 20 W. H. King 21 J. Bates Norris 22 J. M. Powell 23 C. C. Haun 24 School building 25 Claude Smith 26 Luther Hodge 27 James S. Crownover 28 Tom Hall 29 Harry Burden 30 Harve Stevens 31 Loom building 32 Albert Lively 33 James O. Fox 34 Ed Little 35 Forrest Kidwell 36 John R. Cope 37 Clarence Parker 38 Ambrose Wakefield 39 Gilbert Johnson 40 J. L. Arp 41 Henry O. Cox 42 Jake Proffitt | <p>VALLEY ROAD:</p> <ol style="list-style-type: none"> 2 L. K. Flynn** 3 O. C. Hagan** 4 Wm. Tallent 5 Capt. John B. Rogers** 6 Chas E. Cobb 7 Hugle M. Nealey 8 Chester Beasley 9 Dallas S. Taylor 10 Cecil E. King 11 R. L. Maynard 12 Walter G. Lack 13 Benton M. Jernigan 14 W. J. Stevens 15 J. M. Anderson 16 Albert R. Henry 17 L. E. Kemmer 18 W. R. England 19 J. J. Bird | <p>CHESTNUT LANE:</p> <ol style="list-style-type: none"> 1 Arthur Stultz 2 Hassell Norris 3 Omil N. Johnston 4 Clay Jaynes 5 Arthur Elmore 6 William Wilbanks 7 Stanley York 8 Joe Swallows 9 Raymond Jones 10 R. C. Henry 11 J. C. Chambers 12 J. H. Phillips 13 J. M. Watley 14 Waymon Emery 15 Carlos Garrett 16 Wm. S. Lee 17 James A. Ford 18 Hubert Horn 19 J. Floyd Givens 20 D. A. Verble 21 Craven McDaniel 22 Nathan Loftis 23 Thomas A. Elmore 24 Alton Fox 25 Walter Turner 26 C. S. Brazzale 27 E. W. Mansfield** 28 Frank Griffith 29 Tommy Callahan 30 Harold Fox 31 H. E. Newberry 32 John A. Worley 33 Will King 34 J. B. Kidwell 35 Wm. O. Baltimore 36 Beecher Wilbanks | <p>OPEN RANGE:</p> <ol style="list-style-type: none"> 2 Arthur Elmore 3 Stanley York 4 Joe Swallows 5 Raymond Jones 6 R. C. Henry 7 J. C. Chambers 8 J. H. Phillips 9 J. M. Watley 10 Waymon Emery 11 Carlos Garrett 12 Wm. S. Lee 13 James A. Ford 14 Hubert Horn 15 J. Floyd Givens 16 D. A. Verble 17 Craven McDaniel 18 Nathan Loftis 19 Thomas A. Elmore 20 Alton Fox 21 Walter Turner 22 C. S. Brazzale 23 E. W. Mansfield** 24 Frank Griffith 25 Tommy Callahan 26 Harold Fox 27 H. E. Newberry 28 John A. Worley 29 Will King 30 J. B. Kidwell 31 Wm. O. Baltimore 32 Beecher Wilbanks | <p>VALLEY ROAD:</p> <ol style="list-style-type: none"> 2 L. K. Flynn** 3 O. C. Hagan** 4 Wm. Tallent 5 Capt. John B. Rogers** 6 Chas E. Cobb 7 Hugle M. Nealey 8 Chester Beasley 9 Dallas S. Taylor 10 Cecil E. King 11 R. L. Maynard 12 Walter G. Lack 13 Benton M. Jernigan 14 W. J. Stevens 15 J. M. Anderson 16 Albert R. Henry 17 L. E. Kemmer 18 W. R. England 19 J. J. Bird | <p>HIGHLAND LANE:</p> <ol style="list-style-type: none"> 7 C. A. Gore 8 Levon Miller 9 Felix B. Anderson 10 Robert F. Galyon 11 J. A. Ford 12 Harry J. Borwn 13 Robert C. McPherson 14 Lloyd E. Bryant 15 Louis M. Martin 16 Pola Sherrill 17 Casto Elmore 18 Virgil Randolph 19 James L. Gracey 20 Orion C. Miller 21 O. G. Metzger | <p>PIGEON RIDGE:</p> <ol style="list-style-type: none"> 5 Luther B. Kidwell 6 Roy Loshbough 7 Sherman Stevens 8 L. B. Simmons 9 James J. Blaylock 10 Terry B. 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significance of the Homestead community. Some had what appears to be their original, intact parcels of land. However, the district provides little indication of its subsistence farming history, primarily because of the extensive subdividing of the Homestead parcels and because of the changing use of the area to a vacation/retirement destination and the fact that the newcomers generally do not farm. The NRHP nomination discussed the existence of fence rows and a fruit orchard, but these features were not looked for in the windshield survey and may or may not be extant.

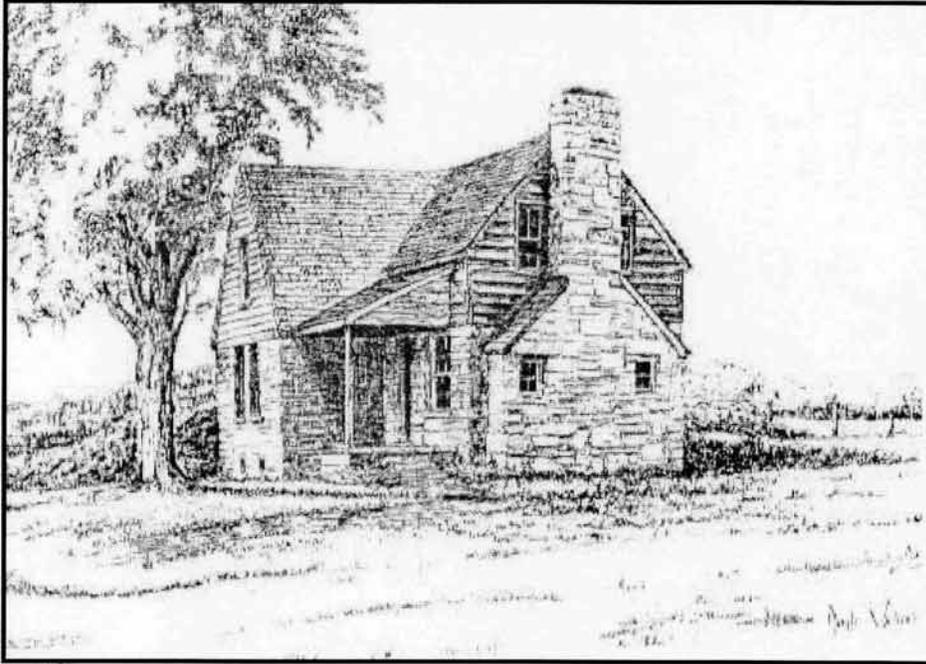


Figure 4.
Drawing of
Typical
Homestead
House. From
notecard by
Doyle Vaden.

3.1.2 Historic Roadway Features

The district has two very interesting planned roadway features that are not commonly found in rural areas: cul de sacs and “Y” intersections. The cul de sacs are found at several locations in the district. Instead of being a dirt turn-around at a dead end road as one would expect to find in a rural area, they are large, circular drives with a grassy area filling the center of the circle. These cul de sacs are found at:

- Coon Hollow Road
- Wild Plum Lane
- Crab Apple Lane (Entrance to Bear Trace Golf Course off cul de sac)
- Chestnut Lane (Chestnut Court, a modern street, now branches off the historic cul de sac)

All of the cul de sacs have one or more Homestead houses on them.

While “Y” intersections are found sporadically in rural areas elsewhere, the “Y” intersections at Cumberland Homesteads are different. They were part of the original community plan and are found throughout the district. Like the cul de sacs, the land

within the "Y" area is grassed. Each intersection is different in size and layout. Recognizable "Y" intersections are found at:

- S. Old Mail Road at Pigeon Ridge (State Route 419)
- US 127 at State Route 419 (Cumberland Mountain Park Entrance)
- US 127 at Sawmill Road
- State Route 68 at Turkey Oak
- State Route 68 at Sawmill Road
- Turkey Oak at Deep Draw
- Open Range Road at Deep Draw (two intersections)
- Deep Draw at US 70

Figure 5 is a historic drawing of the "Y" intersection at today's US 127 and State Route 68 intersection.

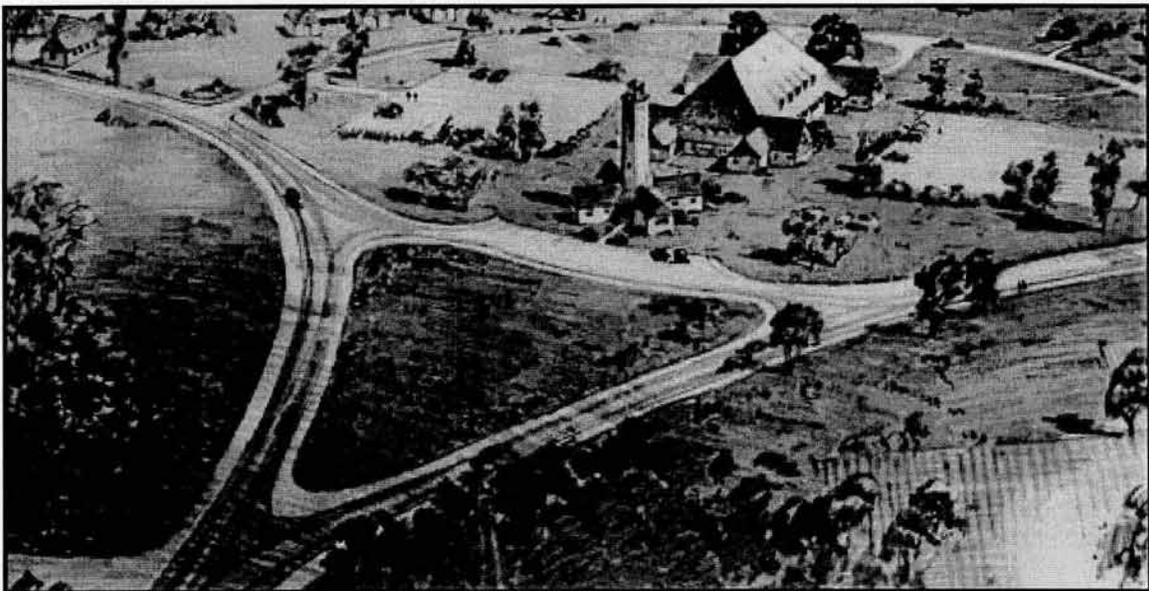


Figure 5. Historic Drawing of "Y" intersection at US 127 and State Route 68 (from Library of Congress website). The Homestead Tower is in the upper center of the photograph.

Cumberland Mountain State Park has intact three stone bridges. One is a multiple arched bridge on State Route 411 and another is a charmingly rustic structure on S. Old Mail Road. Outside the park, a stone arched bridge is on Deep Draw Road, west of its intersection with US 70. The bridges are beautiful structures, built of Crab Orchard stone and well-preserved.

3.1.3 Woodlands

Homesteaders cleared land in the Cumberland Homesteads development for farming and construction of farmsteads. In the original Homestead plan, several areas were designated as "Woodlands." A large area of the Woodland-designated land around Byrd Creek and Three Mile Creek was developed into the Cumberland Mountain State Park. The park was built by the Civilian Conservation Corps for the Homestead community.

The park area has many older buildings and some newer buildings, such as the restaurant on Byrd Lake. The park remains primarily wooded. In recent years, however, the Jack Nicholas Bear Trace Golf Course has been developed in the south part of the park; it is accessed at the end of Wild Plum Lane, where there is a modern clubhouse. Other areas designated in the original plan as "woodlands" and their status today are as follows:

- Area Old Highway 28 at south edge of district: subdivision development at far south end;
- Area along US 127 and Sawmill Road remains undeveloped;
- Area along State Route 68 at south edge of district near Daddys Creek remains undeveloped;
- Area between Open Ridge and Turkey Creek has a large-lot new subdivision under development;
- Area along Byrd Creek, west of US 70 at northeast corner of district, remains undeveloped;
- Area between Open Range Road and US 70 has a number of small-lot subdivisions;
- Area of US 127 between the State Route 68 intersection and Crossville, on the east side along Byrd Creek remains largely undeveloped; and
- Area along Deep Draw west of Turkey Oak remains undeveloped.

3.1.4 Other Homestead Properties

A concentration of non-residential Homestead buildings remains at the intersection of US 68 and US 127. This focal point of the intersection is the Homesteads Tower, which is considered a local landmark and the heart of the Cumberland Homesteads community. Also at this location are two Homestead Schools. Non-contributing buildings are a government garage, a 1950 gym and a 1970 library/cafeteria building, and a new fire station on US 127. This area also contains the old co-op hosiery mill, which has been radically altered, and a water tower associated with the mill. On Deep Draw Road near this intersection is the old water tower that was associated with the cannery. East of Turkey Oak on Deep Draw Road, the old loom house is obscured by a large addition built when the building was converted for use as a church.

A cemetery, according to the NRHP nomination was "not included in the original plan [but] was hastily laid out upon the death of an original homesteader's young daughter. The cemetery appears to have been used for only a short period of time and is now overgrown and inaccessible." The cemetery is on the west side of Highland Lane, north of Deep Draw Road. The preliminary layout of Cumberland Homesteads shows two lots in this area as "Burial Ground" and "Burial Ground Reserve," and the Dorton TN USGS quadrangle map labels the area as "Homestead Cem." No investigations have been done in this overgrown area and it is unknown if there are any burials there.

3.1.5 Concentrations/Pockets of Homestead Properties

A review of the color-coded property map (Attachment 2) and the marked up aerial photographs (Attachment 3) provides a "bird's eye view" of the locations of the concentrations of Homestead houses. The topography of the area and viewsheds,

which are not evident on these two maps, also should be considered in the evaluation of which areas best depict the essence of the Cumberland Homesteads community.

The areas that best depict the Homestead Community are:

1. State Route 68 (historically Grassy Cove Road), from just north of Turkey Oak Road to south of Buck Creek Road. While a concentration of homestead houses exists, the highway through this area has been improved through the addition of shoulders and wider travel lanes than are found on many other locations in the district.
2. Open Range Road. This area has the highest concentration of homestead houses and intact farmsteads and the fewest intrusions. However, the subdivisions east of the east side of the Open Range Road loop detract somewhat from the setting on the southeast portion of this loop road.
3. Huckleberry Lane. This short road has six homestead houses and three modern houses, but retains some integrity of setting.
4. State Route 419/Pigeon Ridge Road. There is a concentration of homestead houses near the intersection of State Route 419 and Davidson Road and west from the intersection. This concentration, although there are some modern intrusions, exists in a setting that gives a feeling of what it must have been like in the community in the 1930s. The road is at a high elevation and offers great distant views of mountains to the south and the forested park to the north. This area contains a museum and a B&B, both in Cumberland Homestead houses.
5. Deep Draw Road, Between Byrd Branch and about ½ mile east of Sawmill Road. This area has a concentration of Homestead houses, but the physical setting is not as nice as it is at some of the above-discussed areas. The three houses near Byrd Branch at the major curve in Deep Draw Road, however, are particularly nice.
6. South Main Street/US 127. At the very northern end of the district is a grouping of five Homestead houses on South Main/US 127. Subdivision development, however, is rapidly encroaching upon the settings and land of these properties. In addition, the roadway in the vicinity of these houses is much wider than it was historically and it detracts from the setting of the houses. One of the houses (on the east side of the highway) is currently serving as the office for a new subdivision development.

3.2 Non-Homestead Development

3.2.1 Infill Housing

All areas of the district have experienced the subdivision of original parcels and development of single-family houses on subdivided parcels, outside subdivision developments. In some areas this subdivision has left fair-sized lots, while in others lots are smaller, around one acre or less. At some locations in the district, modern housing has most assuredly replaced Cumberland Homestead houses

3.2.2 Subdivisions

Residential subdivisions have also been developed in and partially within the historic district boundaries. On the east side of the district, small subdivisions have been developed between Open Range Road and Daddy's Creek (Sunny Acres/Long Drive, Thomas Street, and Backwoods Way) and are partially within the district. These subdivisions were extant when the district was listed in the NRHP. The original recommended NRHP boundary was re-drawn in this location to exclude most of the subdivisions, but portions along Open Range are within the district boundaries.

The Highland View East and West Subdivisions were also extant at the time the district was listed. Located north of the Deep Draw and Highland Lane intersection on both sides of Highland Lane and containing about 100 houses, this subdivision was listed in the nomination as a non-contributing landscape feature. Subdivisions are also found at the end of Chestnut Lane (Chestnut Court), all along the south side of State Route 68 between Rector Lane and Carl Nail, along Parkview Place, on Pigeon Ridge Road (State Route 419) at its intersection with State Route 101, along Old State Coach Road and on US 127, north of its intersection with State Route 68, a subdivision is on East Lake Road. Another subdivision is on Southgate off South Main (US 127), and a new subdivision is under development off South Main, south of Malver. A Cumberland Homestead house serves as the office for the development. One new, large-lot subdivision has been laid out off Open Range (Keating Hollow Estates) and several houses have been built there.

3.2.3 Highway-Related, Commercial and Industrial Development

Some industries and commercial establishments are along State Route 68, east of its intersection with US 127. In this area are a factory, commercial strips, a gas station/convenience mart and a TVA office. A 1950s hotel is on US 70, just north of its intersection with Deep Draw Road. A gas station and some commercial uses are found on US 127 south of its intersection with State Route 68. The majority of the commercial development and the least intact area of the district is on US 127, north of its intersection with State Route 68. The subject area, between the Cumberland Homesteads Tower and the Crossville corporate limits was designated as "woodlands" in the Homestead plan. Although the Cumberland Mountain State Park boundaries abut the west side of US 127 in two places through this area, this area has primarily been developed with small-scale commercial uses. For a distance of one and one-half miles through this area, there never were any Homestead buildings and modern buildings line the roadway through this area today. (As previously stated, at the very northern end of the district is a grouping of five Homestead houses on South Main/US127, but subdivision development is rapidly encroaching upon the settings and land of these properties.) With the exception of the US 127 corridor north of the Tower and the segment of State Route 68, just southeast of the Tower, very little commercial development has occurred within the district.

3.2.4 Churches

No historic churches are extant within the district. Several modern churches have been built at various locations in the district. On the more major arteries (US 127, State Route 68), the churches are relatively large, modern structures with large parking lots. Examples include the Church on the west side of South Main near the northern

boundary of the district, the church at the intersection of State Route 68 and Deep Draw Road, and a church on the east side of US 127 at its intersection with State Route 419 across from the Cumberland Mountain State Park entrance. Off the main roads (on Deep Draw Road east of Turkey Oak), a modern church has been built onto the front of the old Homestead loom house.

3.3 Summary of Findings

While the district has experienced subdivision of many of its parcels for single-family or subdivision development, the district retains many of its original Homestead houses, farmstead outbuildings and areas designated as "woodlands" on the original Homestead community plans. The complex containing the tower at the intersection of US 127 and State Route 68 still serves as the center of the community.

One large area that does not retain integrity is the US 127 corridor north of its intersection with State Route 68, State Route 68 from US 127 east to the vicinity of its intersection with Deep Draw Road, Deep Draw Road between US 127 and Highland Lane and, Highland Lane north to the north end of the Highland View Subdivision. Figure 6 depicts this area.

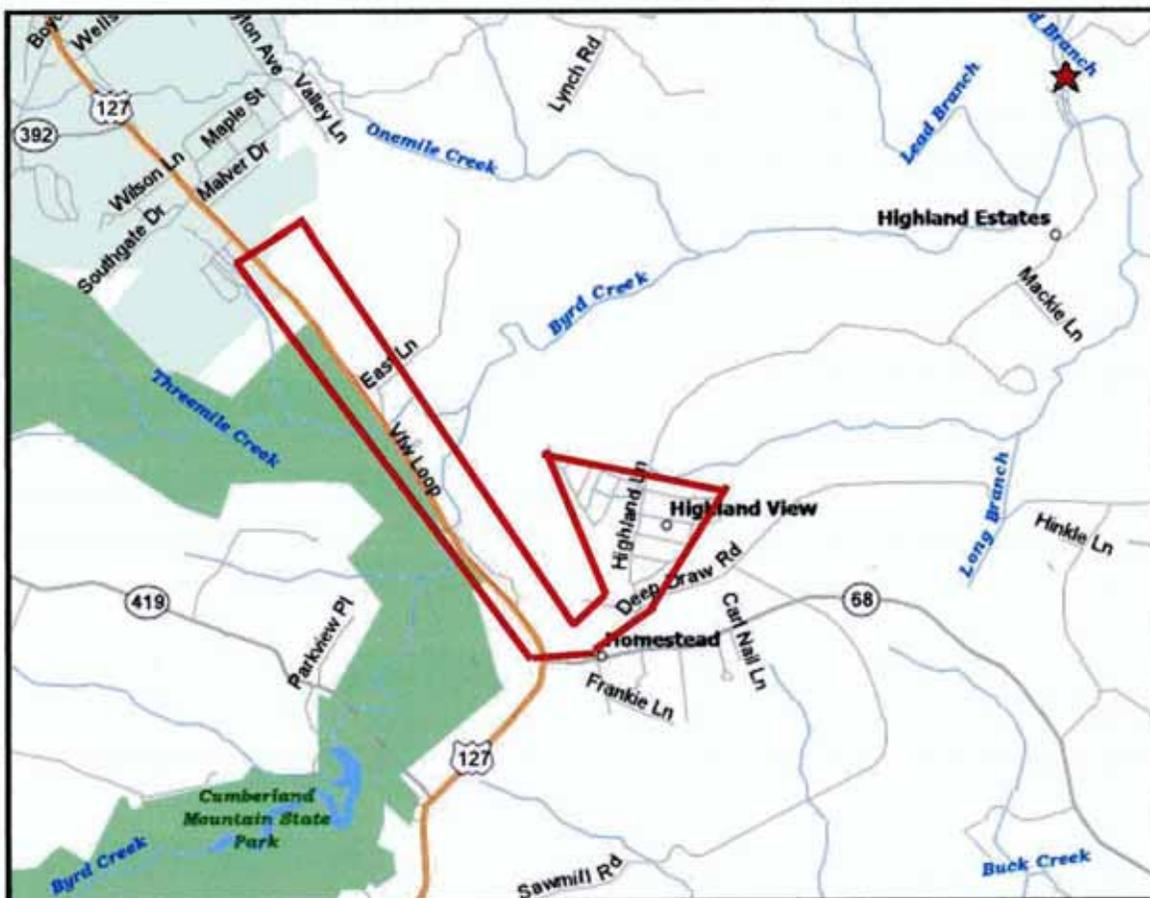


Figure 6. Area of Cumberland Homesteads Historic District that retains no integrity.

Figure 7 on the following page shows the general locations of areas of the district that retain nice clusters of Homestead houses. These clusters are discussed in more detail in Section 3.1.6. Full size graphics in Attachments 2 and 3 provide a more detailed location of these concentrations.

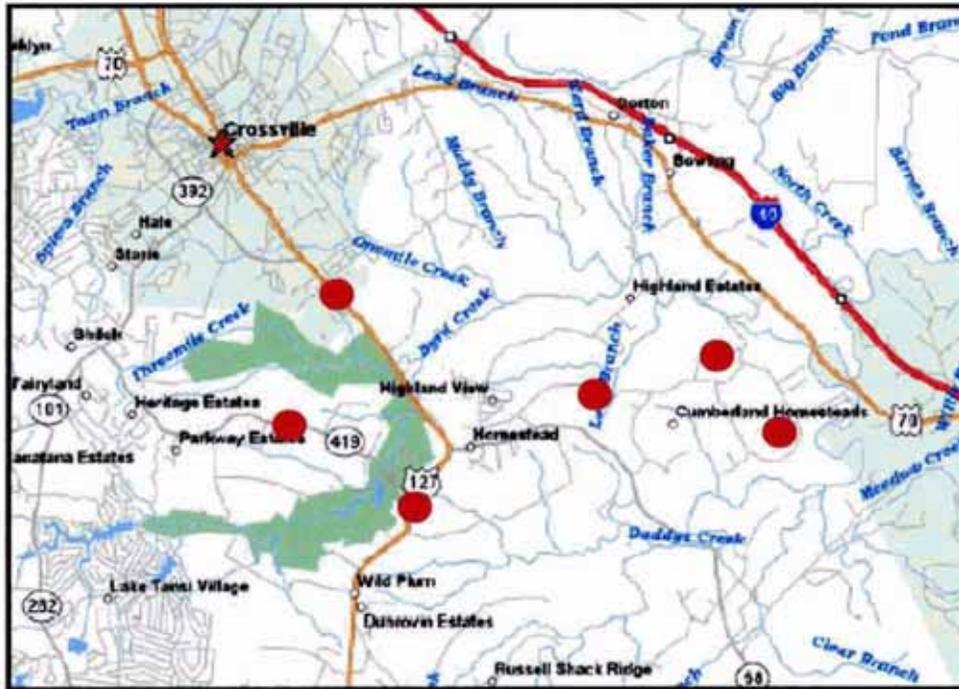


Figure 7. Concentrations of Homestead Homes in Cumberland Homesteads Historic District.