

**APPENDIX L**

**SECTION 4(F) EVALUATION**



**SECTION 4(F) EVALUATION**

**CAMP JOSEPH T. ROBINSON NATIVE STONE ARCHITECTURE  
HISTORIC DISTRICT**

AHTD JOB NUMBER R60101

FAP NUMBER DPI-0100(1)

HWY. 67 – I-40 WEST

PULASKI COUNTY, AR

Submitted Pursuant to 49 U.S.C. Section 303 and 23 U.S.C. Section 138

by the

U.S. Department of Transportation

Federal Highway Administration

and the

Arkansas State Highway and Transportation Department

April 2008

## Introduction

The Secretary of Transportation may approve a project that requires the use of land from a significant publicly-owned public park, recreation area, wildlife/waterfowl refuge, or any historic site of national, state, or local significance only if the following determinations have been made: (1) there is no feasible and prudent alternative to the use of such land; and (2) all possible planning has been undertaken to minimize harm to the property resulting from such use. These determinations, submitted pursuant to 49 USC Section 303 and 23 USC Section 138, are set forth in a Section 4(f) Evaluation.

## Project History

The Arkansas State Highway and Transportation Department (AHTD), in cooperation with the Federal Highway Administration (FHWA), is proposing a highway project located in northern Pulaski County, Arkansas. This project, commonly known as the North Belt Freeway, would consist of a four-lane, divided highway constructed to Interstate standards and located between Highway 67 and the Interstate 40/430 Interchange. The completion of the eastern segment of the North Belt Freeway between Highway 67 and the Interstate 40/440 Interchange left this proposed project as the only remaining section of the urban area's circumferential freeway to be implemented. Although adjacent sections of the circumferential freeway are six-lane, forecast traffic volumes for the proposed project only warrant a four-lane highway. The project is 12.7 miles (20.4 kilometers) in length and would be constructed on new location with an average estimated right of way width of 300 feet (91 meters). Access would be fully controlled with interchanges and grade separations utilized at selected locations.

The proposed North Belt Freeway is included in the Central Arkansas Regional Transportation Study (CARTS) Metro 2030 Metropolitan Transportation Plan and has been part of the transportation planning efforts in northern Pulaski County since 1941. Since 1979, the proposed North Belt Freeway has been shown in essentially the same general corridor identified in the project's 1994 Final Environmental Impact Statement (FEIS) and Record of Decision (ROD).

Metroplan, the local metropolitan planning organization, did not include the North Belt Freeway project in the CARTS Transportation Improvement Program in 1997. This decision was made because a portion of the Selected Alternative was not compatible with the City of Sherwood's Master Street Plan. Since the AHTD was unable to proceed with activities on the North Belt Freeway within a 3-year period after the ROD, reassessment of the Selected Alternative became necessary.

In 2003, a Preliminary Evaluation was conducted by the AHTD in order to resolve issues necessary to proceed with a FEIS reassessment. Public comment from the expanding residential neighborhoods adjacent to the Selected Alternative and Sherwood's continuing opposition resulted in the necessity to produce a Supplemental Draft Environmental Impact Statement (SDEIS) as the means of conducting a project reassessment. The SDEIS was completed and approved by FHWA for dissemination in January 2007.

The development of alternatives and detailed environmental study of those alternatives was part of the SDEIS process, and resulted in the designation of a Preferred Alternative. Preparation of a new FEIS that fully evaluates the Preferred Alternative and documents the Selected Alternative will complete the environmental process. This process ensures that alternatives meeting the purpose and need of the project are fully evaluated and are developed to minimize the potential environmental impacts.

#### **Alignments Through Camp Robinson**

Camp Robinson, shown in Figure L-1, is a 32,800-acre (13,300-hectare) facility established in 1917 as Camp Pike, and is used daily for the training of National Guardsmen from Arkansas and throughout the nation. The facility is constantly being modernized and, over the years, has increased in importance to the National Guard's training program. Permanent buildings used for offices, training, and housing are known as the cantonment area, and are generally located in the southern portion of Camp Robinson. Northern areas contain extensive small arms and artillery ranges and drop zones for maneuvers. The southwestern portion of Camp Robinson includes an airstrip used by fixed-wing aircraft and helicopters. Camp Robinson is massive, stretching north ten miles (16 kilometers) from North Little Rock into Faulkner County and presents a substantial barrier to cross-county traffic flow in the

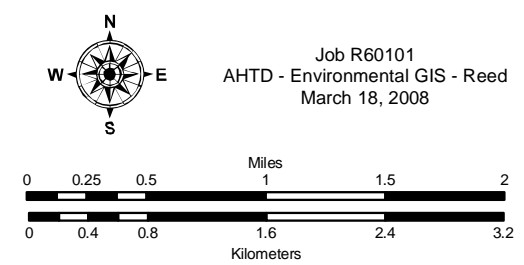
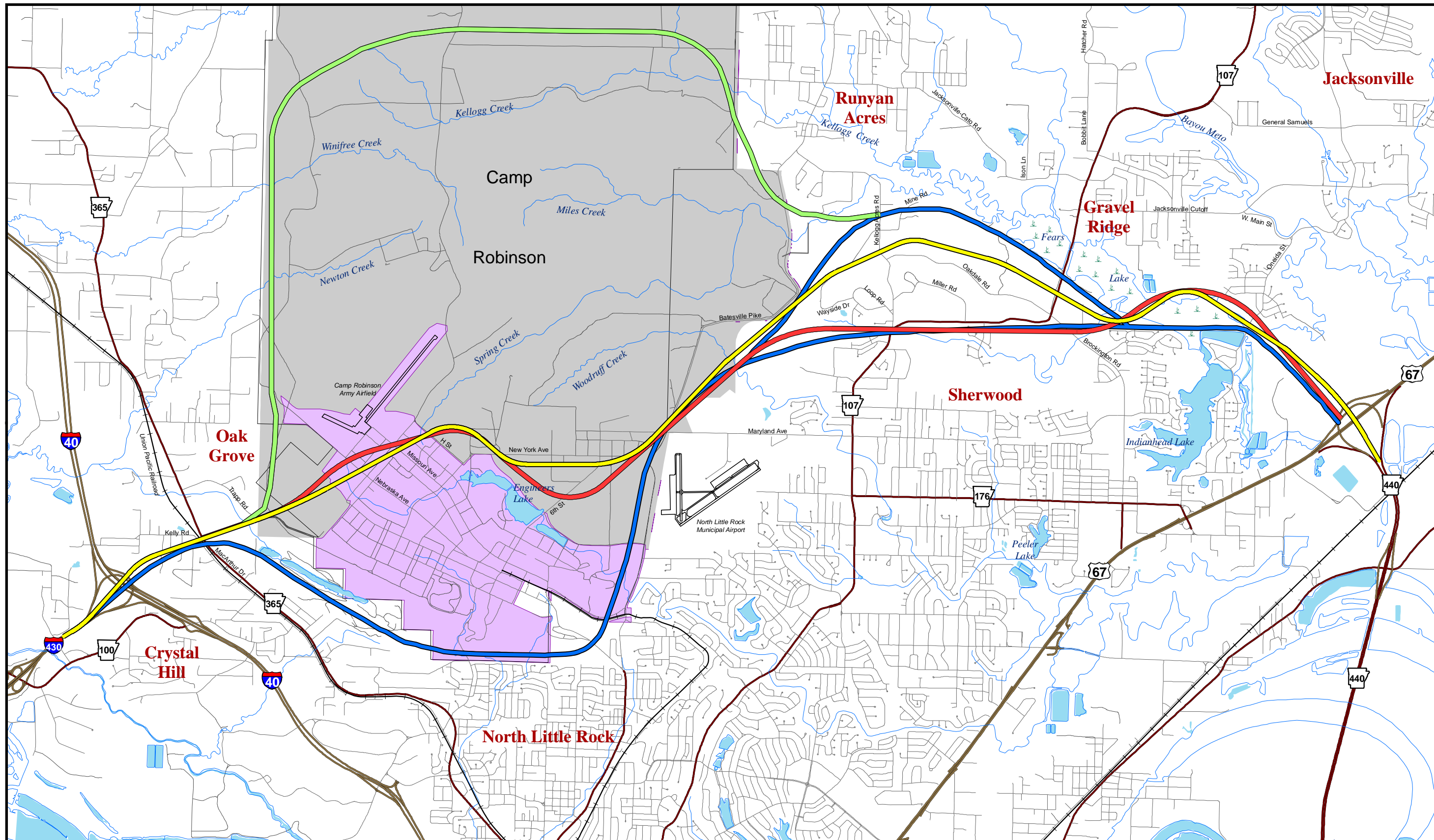
northern portion of Pulaski County. As northern Pulaski County and Lonoke County continue to expand, the presence of this barrier will increasingly become a hindrance to traffic flow.

There have been many routes proposed through Camp Robinson during the preparation of various environmental documents that have been completed for the North Belt Freeway. Camp Robinson officials have only consented to a few of the alignments proposed by the AHTD in the past. Currently, they have agreed to allow only the proposed Preferred Alternative alignment to pass through the Camp due to current Camp land use and future development plans.

The 1984 Draft Environmental Impact Statement (DEIS) included a Preferred Alternative that ran along the southern boundary of Camp Robinson (Figure L-1) and included two route options east of the Camp. Only that portion of the project from I-40 East running northwest to Highway 67 (shown on Figure L-1 as Highway 440) was carried forward as the Preferred Alternative in the 1985 FEIS, since monetary resources were only available for that section. The portion of the project from Highway 67 to the I-40/I-430 Interchange (including the section in Camp Robinson) was not included in the Preferred Alternative for the 1985 FEIS or ROD.

The Preferred Alternative in the 1994 FEIS included an alignment through Camp Robinson just north of the main part of the cantonment area (Figure L-1). This location in the Camp was mutually agreeable and favored by the AHTD over the previous southern route through the Camp, due to decreased project length, lower construction and right of way costs, and the desire to avoid impacts to residential areas just outside the south border of the Camp.

When preparation began in 2004 for the Supplemental Draft Environmental Impact Statement (SDEIS), the AHTD again met with Camp Robinson officials to affirm their preference for the North Belt alignment through the Camp. Camp Robinson officials proposed a new alignment that would lie north of the existing artillery ranges and continue down the west border of the Camp (Figure L-1). This proposed alignment alternative did not meet the purpose and need for the proposed project; less traffic would utilize the alignment



- Legend**
- 1984 DEIS Preferred Alternative
  - 1994 FEIS Preferred Alternative
  - 2004 Camp Robinson Proposal
  - 2008 FEIS Preferred Alternative
  - Cantonment Area of Camp Robinson
  - Camp Robinson

**Figure L-1**  
**Section 4(f) Evaluation**  
**North Belt Alignments**  
**Through Camp Robinson**

This page is intentionally blank.



due to the additional length and amount of misdirection. The preliminary evaluation of the proposed alignment also found that it would be substantially more costly than the 1994 Preferred Alternative. Army National Guard officials were informed of this information at a meeting in February 2005.

At that point, they agreed to allow the AHTD to utilize the 1994 Preferred Alternative, with modifications that related to recent changes in Camp land use and development plans (Figures L-2 & L-3). Camp officials and AHTD achieved consensus on an alignment through compromise, using context sensitive solutions to develop an alignment that will satisfy the project's purpose and need without severely damaging future Camp land use and development. The alignment through Camp Robinson runs between the main cantonment area to the south and the artillery ranges to the north, avoids several old landfills and the proposed location of a new maintenance facility, and minimizes impacts to the historic resources in this area of the Camp. These modifications were incorporated into the 2008 FEIS Preferred Alternative shown in Figure L-1.

### **Purpose and Need**

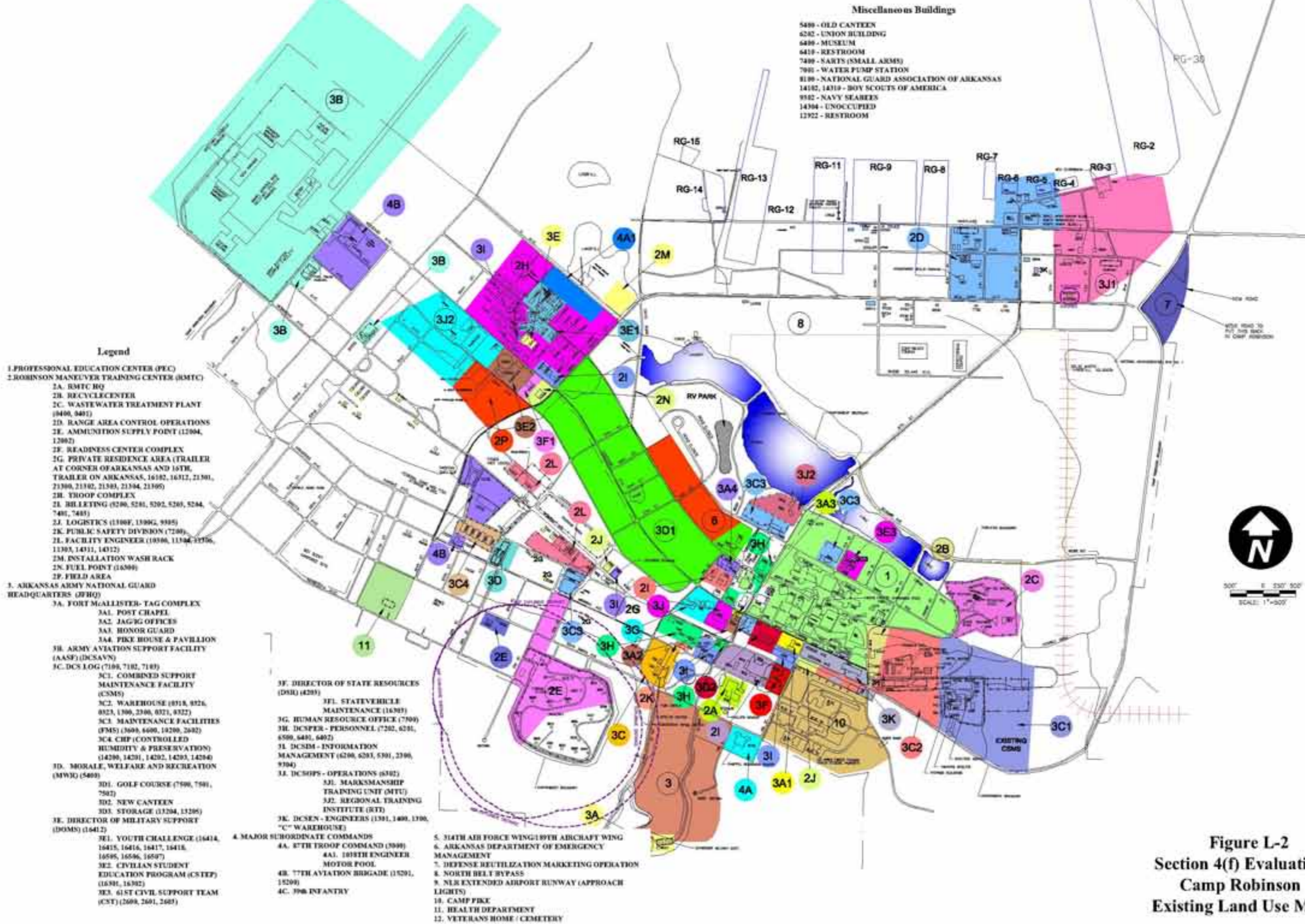
The following project needs were identified in the project's 1994 FEIS:

- 1) Provide a direct east/west facility connecting the developing northeast and northwest parts of Pulaski County;
- 2) Increase safety and decrease congestion on existing streets and highways, especially on Highway 67 and Highway 107;
- 3) Provide traffic service for local traffic demands; and
- 4) Provide a highway facility consistent with the Pulaski Area Transportation Study and related Land Use Plans by providing a facility which:
  - a) Serves as a bypass for east-west through traffic in northern Pulaski County;
  - b) Provides improved access for the traffic generated by the population growth in northern Pulaski County; and

- c) Completes the northern link in the Little Rock/North Little Rock metro area's circumferential freeway by providing a more direct connection from Highway 67 to the interchange of Interstate 40 with Interstate 430.

A review of land development and traffic growth in the region does not indicate a change in the purpose or need for the proposed North Belt Freeway. Some specific findings include:

- 1) Population growth has continued and even accelerated throughout the project area. Locations at both ends of the project area that provide destinations for the facility's motorists have also continued to grow.
- 2) Traffic growth has continued to reflect the development trends in the region.
- 3) The existing and planned roadway network is not sufficient to provide the desired quality of traffic operations within the Little Rock/North Little Rock urban area.
- 4) The specific proposed project alignment alternatives are being threatened by development.
- 5) Camp Robinson continues to create a 10-mile (16-kilometer) long barrier to civilian travel that would continue to focus east-west travel in northern Pulaski County onto Interstate 40 if an alternate route is not developed.



**Figure L-2**  
**Section 4(f) Evaluation**  
**Camp Robinson**  
**Existing Land Use Map**

This page is intentionally blank.

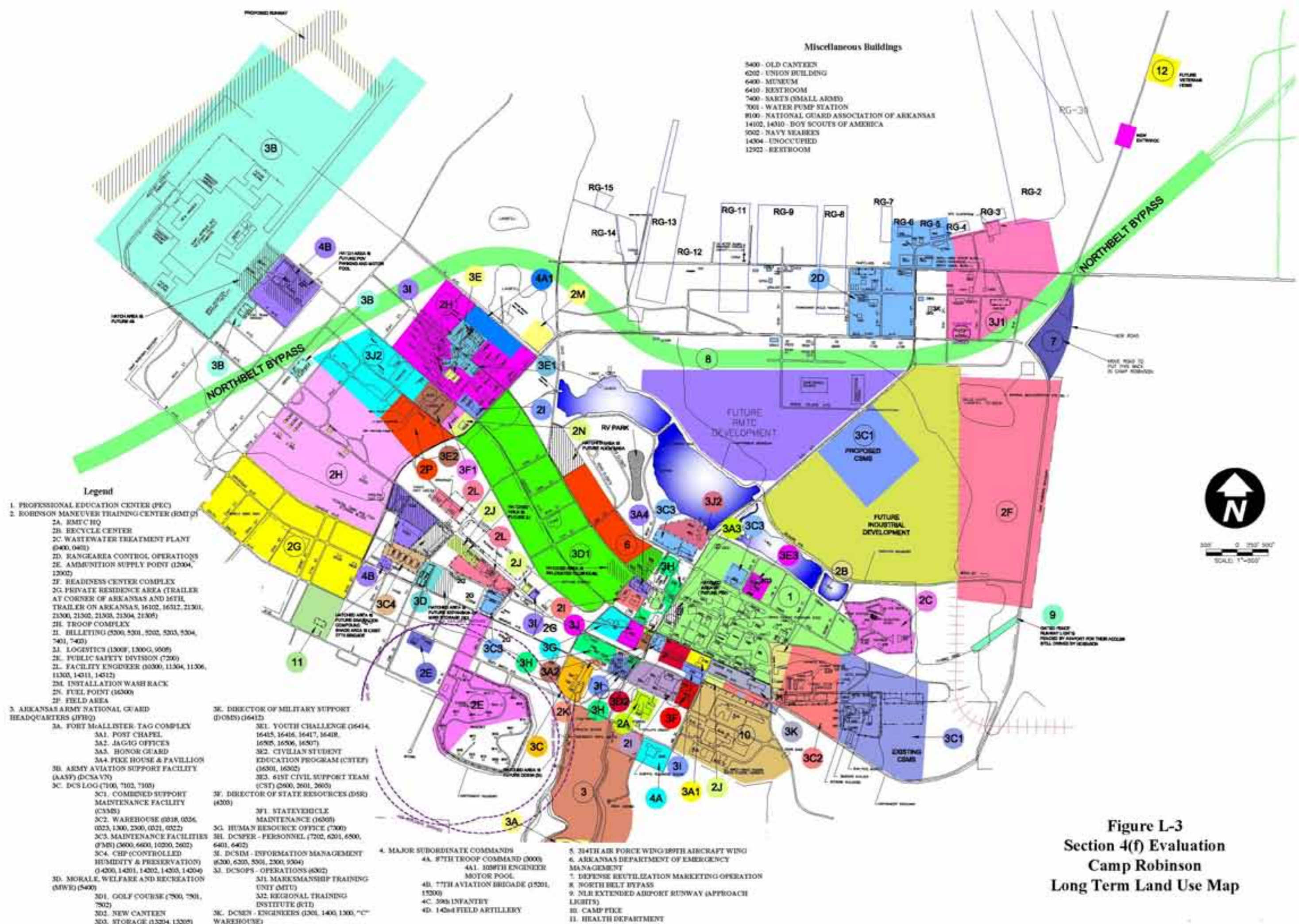


Figure L-3  
Section 4(f) Evaluation  
Camp Robinson  
Long Term Land Use Map

This page is intentionally blank.

## Description and Significance of Section 4(f) Properties

The historic structures being evaluated consist of stone retaining walls, steps, culverts, a ditch and a walkway at separate locations within Camp Robinson, as shown on Figure L-4. All of the structures have been determined eligible for inclusion to the National Register as contributing elements to the Camp Joseph T. Robinson Native Stone Architectural Historic District (District). The structures were identified as being impacted during a routine structural survey of the project area in Camp Robinson. None of the property surrounding these structures contributed to the historic structure determinations.

The historic physical appearance of the stonework at Camp Robinson corresponds to three phases of development: 1) the World War I mobilization (1917); 2) the National Guard period from 1922-1939, which includes stonework improvements by the Civilian Conservation Corps (CCC) (1935-39), and 3) the World War II (WWII) mobilization construction (1940-1941 and 1943). All the stonework impacted by the project is contained within the WWII mobilization period. These structures are part of a complex of stonework resources contributing to a discontinuous historic district that reflects the vernacular traditions of the region and the characteristics and ideals of the Rustic style used for construction at Camp Robinson during the WWII period.

The present landscape at Camp Robinson still retains the visual character of the 1940 design and construction, which incorporated the existing stonework as well as developed additional stonework features. In the 1940 plan by landscape architect Lawrence Sheridan, the stonework served as a key element that provided both structural and visual connections between the otherwise utilitarian military camp and the natural surroundings. A second expansion occurred in 1943, increasing the facilities to accommodate the growing number of troops training at the Camp.

The impacted structures were built during the 1940-41 construction and the 1943 expansion.

### 1940 – 41 Construction Period Structures

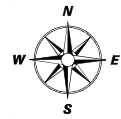
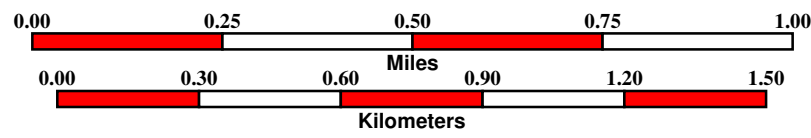
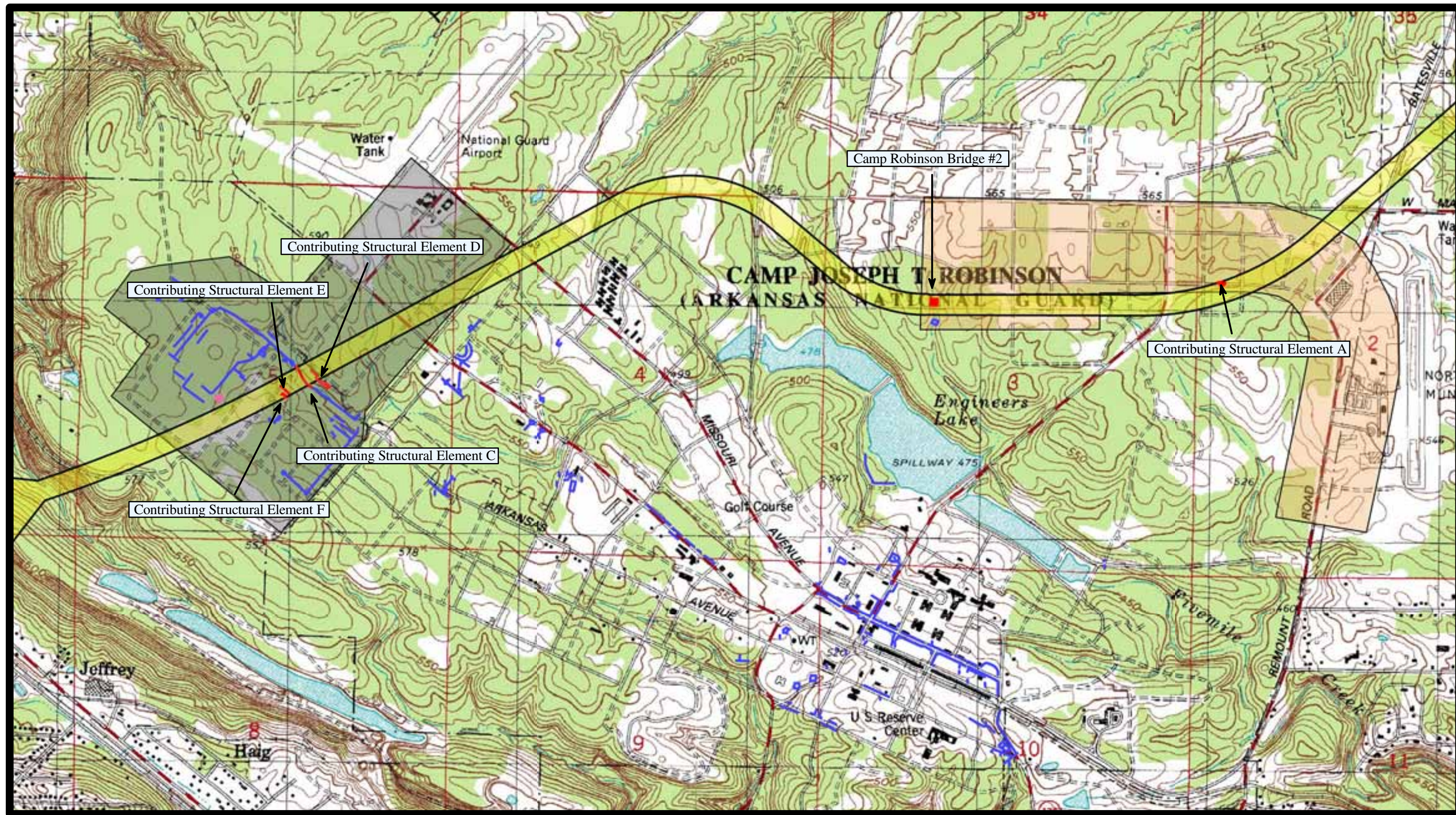
The 1940-41 construction included the “Evacuation and General Hospital” area that is located on the southwestern side of the Camp in the old hospital area and contains contributing Structural Elements C-F. This complex was constructed on undeveloped ground bounded by 27th Street, 32nd Street, Avenue A and Arkansas Avenue.









*Contributing Structural Element C (1940-41 Stone-lined Ditch)*

This rock structure consists of flush-pointed stone retaining walls and a stone-lined bottom. The structure is located north of Arkansas Avenue between 24<sup>th</sup> and 26<sup>th</sup> Streets along Five-Mile Creek. The structure is listed within the original National Register Nomination Form as Contributing Element Numbers 2-12 in Sector C, Area 3 of the old hospital area.





**Legend**

-  Preferred Alternative
-  1940 - Camp Extension
-  1943 - Camp Extension
-  Native Stone Historic District Elements
-  Impacted Native Stone Historic District Elements
-  Potential Cemetery

AHTD Job R60101

**Figure L-4**  
**Section 4(f) Evaluation**  
**Location Map**  
**Contributing Structural Elements**

This page is intentionally blank.



*Contributing Structural Element D (1940-41 Stone Retaining Wall/Steps)*

This rock structure consists of dry stone retaining walls and stone steps in a deteriorated condition. The structure is located south of Avenue B between 24<sup>th</sup> and 26<sup>th</sup> Streets. The structure is listed as Contributing Elements Number 1-31 in Sector C, Area 3 of the old hospital area.



*Contributing Structural Element E (1940-41 Stone Sidewalk)*

This rock structure consists of a stone sidewalk that is associated with the foundations of Structure 676, and is located south of Arkansas Avenue between 24<sup>th</sup> and 26<sup>th</sup> Streets. The structure is not listed as a contributing element within the original National Register Nomination Form, but was documented during a 2006 archeological survey of the old hospital area and recommended as an additional contributing element<sup>1</sup>.

---

<sup>1</sup> Heather Crowl, 2007, *Old Hospital Area Phase I Archeological Survey, Camp Robinson*, URS Corporation, Inc., Gaithersburg, Maryland.



*Contributing Structural Element F (1940-41 Stone Retaining Walls)*

This rock structure consists of stone retaining walls that are associated with the foundations of Structure 604. The structure is located south of Arkansas Avenue between 24<sup>th</sup> and 26<sup>th</sup> Streets. The structure is not listed as a contributing element within the original National Register Nomination Form, but was documented during a 2006 archeological survey of the old hospital area and recommended as an additional contributing element<sup>2</sup>.

### **1943 Expansion Period Structures**

The 1943 expansion is located on the northeast side of the Camp and includes contributing Structural Element A and Camp Robinson Bridge #2. The expansion was constructed on undeveloped ground and was bounded by 58th Street, 71st Street, Delaware Avenue and Maryland Avenue. Only the northern part of the expansion still exists, from 63<sup>rd</sup> Street to 71<sup>st</sup> Street. The eastern part was demolished by the City of North Little Rock for construction of a new airport.

---

<sup>2</sup> Crowl



*Contributing Structural Element A (1943 Stone Culvert and Stone Steps/semi-circular Retaining Wall)*

This rock structure consists of a stone-wall with arched culvert, semi-circular retaining wall, and wide stone steps to the site of former Building 9808. The structures are located south of New York Avenue between 64<sup>th</sup> and 65<sup>th</sup> Streets. The structure is listed as Contributing Element Numbers 2-10 and 7-12 in Sector A, Cantonment-North.



*Camp Robinson Bridge #2 (1943 Stone Culvert)*

This rock structure consists of a stone arched culvert. The structure is located 700 feet (213 meters) southwest of the intersection of New York Avenue and 71<sup>st</sup> Streets. The structure is not listed as a contributing element within the original National Register Nomination Form, but was determined eligible during the architectural resources survey of the project.

The stonework within the District at Camp Robinson to be impacted by this project is historically significant under Criterion A for its association with events that made a significant contribution to broad patterns of history (WWII) and is also architecturally significant under Criterion C as a discontinuous historic district.

### **Alternatives/Findings**

Alternatives were evaluated to determine if there was a feasible and prudent alternative to the proposed impacts to the contributing structural elements A, C-F, and Camp Robinson Bridge #2. Two alternatives were considered that would avoid the Section 4(f) properties. These

alternatives consisted of a southern alternative considered during the 1984 DEIS and a northern alternative that was considered during the 2004 SDEIS. These alternatives and their impacts, as well as the No-Action and Preferred Alternative, are discussed in the following synopsis.

### **No-Action**

The No-Action Alternative would result in no impacts to the contributing structural elements A, C-F, and Camp Robinson Bridge #2. Although the No-Action Alternative is feasible, it is not prudent because it would neither alleviate the existing traffic and safety problems on local streets, Highway 67 and Highway 107 in the project area; nor would it provide a direct east/west connection from Highway 67 to the Interstate 40/430 Interchange to complete the circumferential freeway route around the Little Rock urbanized area.

### **1984 DEIS Preferred Alternative**

The 1984 DEIS Preferred Alternative ran around the southern edge of Camp Robinson. It would impact property owned by the St. Joseph Home (a structure listed on the National Register of Historic Places) and heavily impact a recently constructed apartment complex and nursing home with relocations, noise, and other proximity impacts. In addition, this alternative would have higher construction costs than the Preferred Alternative, at an estimated \$105 million to \$89.5 million (2008 \$) respectively, because it is 1.2 miles (1.9 kilometers) longer. These cost estimates are preliminary and the actual cost for construction of the 1984 DEIS Preferred Alternative would most likely be higher due to the rough terrain it traverses. While this alternative was feasible and would avoid impacts to the contributing structural elements A, C-F, and Camp Robinson Bridge #2, it proved to not be prudent because of the impacts to the St. Joseph Home, additional relocatees, length, and cost.

### **2004 SDEIS Camp Robinson Proposal**

During development of the SDEIS in 2004, the AHTD met with Camp Robinson officials to update their preference for the North Belt alignment through the Camp. At that time, a new alignment was proposed by Camp Robinson officials that ran north of the existing artillery ranges and along the western border of the Camp, avoiding impacts to the contributing



structural elements A, C-F and Camp Robinson Bridge #2. During the preliminary evaluation of this alignment, it was found that it was 3.5 mile (5.6 kilometer) longer than the Preferred Alternative, and that the circuitous route created enough misdirection that the alternative would attract less traffic. Thus the alternative was found not to meet the purpose and need of the project. It was also far more costly, estimated at \$136 million (2008 \$) versus the estimated cost of the Preferred Alternative at \$89.5 million (2008 \$). For these reasons, this alignment was found not to be prudent.

### **Preferred Alternative**

The Preferred Alternative is located in roughly the same area as 1984 DEIS Alternatives C, D, and E. These original alternatives were discarded because Camp Robinson officials believed they would disrupt military operations in the Camp. The 1994 FEIS states that these previous alternatives were reconsidered after meetings with the Adjunct General. It also states that a single alternative through the Camp was then developed by AHTD in an area delineated by Camp Robinson for the project. As part of the development of the 2004 SDEIS and current FEIS, meetings were held with Camp officials to update the Preferred Alternative through the Camp related to land use changes and future development plans of the Camp. Since the project cannot be located in or constructed through the Camp without total concurrence from the Camp officials (see coordination letter in the Section 4(f) Evaluation Appendix), avoidance of the contributing structural elements A, C – F and Camp Robinson Bridge #2 is not feasible.

This alternative is considered prudent because:

- Camp Robinson presents a ten-mile (16-kilometer) long north/south traffic flow barrier;
- It avoids the landfills, artillery ranges, main cantonment area, and location of new facilities under construction or planned by the Camp. Camp officials have agreed upon this alternative as not being overly harmful to security, camp land use, or development patterns;

- While this alternative does impact stone structures within Camp Robinson that are considered Section 4(f) properties, these structures are in poor condition, do not represent the most intact and significant examples of stonework available on Camp property, and the adverse effect has been mitigated in accordance with State Historic Preservation Officer (SHPO) requirements and by consultation with the Camp Robinson Environmental Cultural Resources Manager according to the Integrated Cultural Resource Management Plan;
- It achieves the purpose and need of the project;
- It does not cause substantial relocations; and
- The estimated costs of construction are the lowest because it is the shortest alternative considered.

### **Coordination**

After the identification of the stone structures and recognizing their association with the Camp Robinson Native Stone Architecture Historic District, the AHTD requested guidance from the SHPO on appropriate mitigation for the acquisition and demolition of the six Section 4(f) properties. The SHPO indicated that the structures would require documentation that meets the Arkansas Historic Preservation Program's architectural documentation standards. This documentation was completed, submitted, and accepted by the SHPO and Camp Robinson Officials as mitigation for the acquisition and demolition of the standing structures. This documentation, along with the most recent letter from Camp Robinson supporting the Preferred Alternative, is included in the Appendix.

### **Measures to Minimize Harm**

Agreement between the FHWA and the SHPO has been reached through the Section 106 process (36 CFR 800) of the National Historic Preservation Act (16 USC 470) on measures to minimize harm, and these measures have been incorporated into this project.

The SHPO indicated that the acquisition and demolition of the six Section 4(f) properties would require documentation that meets the Arkansas Historic Preservation Program's architectural documentation standards. Documentation for the structures was submitted to the SHPO for review and comment. This documentation was completed, submitted, and accepted by the SHPO (see Appendix).

The SHPO reviewed the submitted documentation and made a determination of “We believe that the documentation provided along with the color slides and black and white photography mitigates the adverse effect on these historic structures.”

**Summary**

Table 1 contains a summary of the analysis and decision-making information included in this evaluation.

<b>Table 1 Section 4(f) Analysis Summary</b>					
<b>Alternative</b>	<b>Feasible</b>	<b>Prudent</b>	<b>Uses Section 4(f) Property</b>	<b>Harm to Section 4(f) Property (With Mitigation)</b>	<b>Additional Estimated Impacts &amp; Costs (2008 \$) (Compared to Preferred Alternative)</b>
No-Action	Yes	No	No	None	None
1984 DEIS Preferred Alternative	Yes	No	Yes	Impacts to St. Joseph Home, a NHRP property	Numerous relocatees Length - 1.2 miles (1.9 kilometers) Construction constraints Cost - \$15.5 million
2004 SDEIS Camp Robinson Proposal	Yes	No	No	None	Lower traffic projections Length - 3.5 miles (5.6 kilometers) Cost - \$46.5 million
Preferred Alternative	Yes	Yes	Yes	Impacts structural elements A, C-F and Camp Robinson Bridge #2*	None

\*This Alternative yielded an Adverse Effect determination that was mitigated in accordance with the Arkansas Historic Preservation Program’s architectural documentation standards.

## Conclusion

It is the recommendation of the Arkansas State Highway and Transportation Department that the Preferred Alternative be built on new location to those specifications, drawings, and agreements as set forth by the FHWA and the AHTD. Contributing structural Elements A, C-F and Camp Robinson Bridge #2 will be demolished by the project, but have been documented to the Arkansas Historic Preservation Program standards as mitigation for the adverse effect.

Based upon the above considerations, there is no feasible and prudent alternative to the use of the contributing structural elements A, C-F and Camp Robinson Bridge #2.

## **SECTION 4(F) APPENDIX**



MILITARY DEPARTMENT OF ARKANSAS  
OFFICE OF THE ADJUTANT GENERAL  
CAMP JOSEPH T. ROBINSON  
NORTH LITTLE ROCK, ARKANSAS 72199-9600

RECEIVED  
AHTD

SEP 13 2007

ENVIRONMENTAL  
DIVISION

MIKE BEEBE  
GOVERNOR

August 31, 2007

WILLIAM D. ...  
MAJOR GENERAL  
THE ADJUTANT

Deputy Chief of Staff, Engineering

Mr. Lynn Malbrough  
Division Head, Environmental Division  
Arkansas Highway and Transportation Department  
P. O. Box 2261  
Little Rock, AR 72203

Dear Mr. Malbrough,

The Arkansas Army National Guard (AR ARNG) will be submitting documentation to the Arkansas Historic Preservation Program (AHPP) to demolish the historic bridge identified by the Arkansas Highway and Transportation Department (AHTD) located on Camp Joseph T. Robinson (CJTR). This bridge was originally identified by AHTD employees as Structure XXX in a letter submitted to the AHPP dated April 25, 2006. This bridge was identified as potentially being impacted by the proposed North Belt Freeway. The AHTD employees deemed this bridge eligible for listing in the National Register of Historic Places. The AHPP was in concurrence with this opinion (AHPP Tracking #38584). The AR ARNG does not want an alternate route through CJTR to avoid the historic bridge; therefore we are submitting documentation to the AHPP to demolish it.


Given that this bridge was identified as historic, documentation is being done to mitigate the adverse effects of demolishing it. The Cultural Resource Manager for the AR ARNG will be completing an Arkansas Architectural Resource Form (AARF) for the structure, as well as taking photographs required by the AHPP. The AR ARNG will provide the AHTD with copies of the AARF and the resulting AHPP letter which states that the adverse effects of demolition have been mitigated.

**ARKANSAS' TOTAL FORCE... READY, RELEVANT, RESPONSIVE**

- 2 -

If you have any questions, please contact Chris Page, Cultural Resource Manager for the Arkansas Army National Guard at (501) 212-5889, (501) 837-1275, or christopher.page4@ar.ngb.army.mil.

Sincerely,

  
Robert E. Embrey  
Lieutenant Colonel, US Army  
Deputy Chief of Staff, Engineering

cc:  
Colonel Everett S. Payne



The Department of  
**Arkansas  
Heritage**

Mike Beebe  
Governor

Cathie Matthews  
Director

Arkansas Arts Council

Arkansas Natural Heritage  
Commission

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars  
Cultural Center

Old State House Museum



Arkansas Historic  
Preservation Program

1500 Tower Building  
323 Center Street  
Little Rock, AR 72201  
(501) 324-9880  
fax: (501) 324-9184  
tdd: (501) 324-9811

e-mail:

[info@arkansaspreservation.org](mailto:info@arkansaspreservation.org)

website:

[www.arkansaspreservation.org](http://www.arkansaspreservation.org)

An Equal Opportunity Employer



November 16, 2007

Lieutenant Colonel Robert E. Embrey  
Deputy Chief of Staff, Engineering  
Military Department of Arkansas  
Office of the Adjutant General  
Camp Joseph T. Robinson  
North Little Rock, Arkansas 72199-9600

Re: Pulaski County – North Little Rock  
Section 106 Review – USA  
Proposed Bridge Demolition  
AHPP Tracking #38584

Dear Lieutenant Colonel Embrey:

Thank you for submitting the completed Arkansas architectural resources form for the bridge located south of New York Avenue in Training area 22 on Camp Robinson. We believe that the documentation provided on the form along with color slides and black and white photography mitigates the adverse effect on this historic bridge. Therefore, we issue a no adverse effect finding and have no objection to the proposed undertaking.

Thank you for your interest and concern for the cultural heritage of Arkansas. If you should have any questions or comments, please contact Tom Marr of the AHPP staff at (501) 324-9880.

Sincerely,

Frances McSwain  
Deputy State Historic Preservation Officer

cc: Federal Highway Administration  
Arkansas State Highway and Transportation Department



ARKANSAS STATE HIGHWAY  
AND  
TRANSPORTATION DEPARTMENT

Dan Flowers  
Director  
Telephone (501) 569-2000



P.O. Box 2261  
Little Rock, Arkansas 72203-2261  
Telefax (501) 569-2400

February 5, 2008

Mr. George McCluskey  
Section 106 Review Officer  
1500 Tower Building  
323 Center Street  
Little Rock, Arkansas 72201

Re: AHTD Job Number R60101  
Hwy. 67 – I-40 West  
Pulaski County

Dear Mr. McCluskey:

As previously discussed, the preferred alignment for the proposed North Belt Freeway will affect five structures that are considered as contributing elements of the Camp Robinson Native Stone Historic District. The district was determined to be eligible to the National Register of Historic Places during a previous cultural resources survey of Camp Robinson. The affected structures (A, C – F) consist of stone retaining walls, stone steps, a stone walkway and stone-lined ditch. Structure B consisted of concrete culvert pipes and is not associated with the Camp Robinson Native Stone Historic District. The preferred North Belt alignment within Camp Robinson was identified by Camp Robinson's command based on current and anticipated plans for the Camp's operations. This alignment will only be an easement for the Freeway with ownership within the Camp retained by the Arkansas National Guard.

Structure A was determined to be a contributing element to the 1943 expansion of the Camp in the New York and Vermont Avenue area in the historic district nomination form. Structures C – F were determined to be contributing elements to the World War II stonework in Area 3 "Old Hospital Area" in the historic district nomination form and were described as deteriorated and lesser examples of the stonework.

A records check and visual architectural survey of the proposed North Belt right of way through the Camp indicates that these five structures are the only above ground features

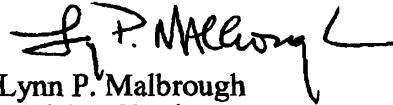
Page 2 of 2

RE: AHTD Job Number R60101

within the right of way that are associated with the District and the only structures that would qualify as significant architectural resources. While concrete slab building foundations are present within the right of way, they do not appear to retain elements that would make them architecturally significant. They will be assessed and documented at a later date during a planned Phase I archeological survey of the proposed right of way.

Because certain architectural resources can warrant preservation in place, the AHTD has georeferenced and documented all five of the noted structures with the enclosed Arkansas Architectural Resources Forms. We believe that this documentation provides a detailed, permanent record and should serve as adequate mitigation should the proposed project necessitate their removal. Please review the submitted documentation and respond as to its adequacy as mitigation for potential impacts to the structures and let us know if these resources warrant preservation in place or further documentation. As mentioned above, a phase I archeological survey is being planned and will provide a summary of the architectural resources identified and an archeological assessment of the APE. Should you have questions or require additional information, please contact Robert Scoggin of my staff at 569-2077.

Sincerely,



Lynn P. Malbrough  
Division Head  
Environmental Division

LPM:JM:RS

Enclosure



The Department of  
**Arkansas  
Heritage**

Mike Beebe  
Governor

Cathie Matthews  
Director

Arkansas Arts Council

Arkansas Natural Heritage  
Commission

Delta Cultural Center

Historic Arkansas Museum

Mosaic Templars  
Cultural Center

Old State House Museum



Arkansas Historic  
Preservation Program

1500 Tower Building  
323 Center Street  
Little Rock, AR 72201

(501) 324-9880  
fax: (501) 324-9184  
tdd: (501) 324-9811

e-mail:

[info@arkansaspreservation.org](mailto:info@arkansaspreservation.org)

website:

[www.arkansaspreservation.org](http://www.arkansaspreservation.org)

An Equal Opportunity Employer



February 07, 2008

Mr. Lynn P. Malbrough  
Division Head, Environmental Division  
Arkansas Highway and Transportation Department  
PO Box 2261  
Little Rock, AR 72203-2261

Re: Pulaski County – North Little Rock  
Section 106 Review – FHWA  
Proposed North Belt Freeway Project  
(HWY 67 – I-40 West Pulaski county)  
AHTD Job Number R60101  
AHPP Tracking #38584

Dear Mr. Malbrough:

Thank you for submitting the completed Arkansas architectural resources forms for the affected structures (A, C – F) located in the Camp Robinson Native Stone Historic District. We believe that the documentation provided along with the color slides and black and white photography mitigates the adverse effect on these historic structures. Also, we have no objection to this proposed alignment for the North Belt Freeway project through Camp Robinson.

Thank you for your interest and concern for the cultural heritage of Arkansas. If you should have any questions or comments, please contact Tom Marr of the AHPP staff at (501) 324-9880.

Sincerely,

*Frances McSwain*

Frances McSwain  
Deputy State Historic Preservation Officer

cc: Federal Highway Administration

RECEIVED  
AHTD

FEB - 8 2008

ENVIRONMENTAL  
DIVISION



MILITARY DEPARTMENT OF ARKANSAS  
OFFICE OF THE ADJUTANT GENERAL  
CAMP JOSEPH T. ROBINSON  
NORTH LITTLE ROCK, ARKANSAS 72199-9600

MIKE BEEBE  
GOVERNOR

May 15, 2008

WILLIAM D. WOFFORD  
MAJOR GENERAL  
THE ADJUTANT GENERAL

Legal Section

Arkansas Highway and Transportation Department  
Environmental Division, Lynn Malbrough  
P.O. Box 2261  
Little Rock, AR 72203

Mr. Malbrough:

The Preferred Alternative route is our preferred alignment for the proposed North Belt within the boundaries of Camp Joseph T. Robinson as outlined in the Supplemental Draft Environmental Impact Statement for project R60101 (January 2007). After several meetings, this location has been chosen the best to suit our needs while also taking into account the needs of the Arkansas Highway and Transportation Department and the citizens of Arkansas. We feel that it is in the best interests of the State of Arkansas to continue with the Preferred Alternative route as currently plotted.

A previous alignment was developed, at our request, which ran north of the existing firing ranges. An evaluation of this alignment returned a higher expected financial cost and lower vehicular traffic volumes than the current Preferred Alternative. The Military Department felt that the Preferred Alternative route could help the State while at the same time minimize the impact of the loop on our training requirements. Therefore, we agreed with the AHTD's finding that the previous alignment did not meet the project's purpose and need.

The Preferred Alternative route is best because it minimizes impact to the Camp Robinson's resources and operations while taking into account current land uses and future development plans. By choosing this alignment, Camp Robinson officials are exercising their authority for the placement of the proposed North Belt Freeway because no right of way will be acquired from the Camp to construct the project. Instead, we will provide a construction easement to the AHTD for the proposed freeway. Please do not hesitate to contact our Attorney Advisor, Thomas Lee, at (501) 212-5033, if we can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "William Johnson".

William Johnson  
Brigadier General  
Deputy Adjutant General

**ARKANSAS' TOTAL FORCE... READY, RELEVANT, RESPONSIVE**