



Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☒ Invite the ACHP to participate in a Section 106 consultation
- ☒ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): N/A

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency):

Federal Highway Administration (FHWA)

4. Name of undertaking/project (Include project/permit/application number if applicable):

Cape Fear Memorial Bridge Replacement Project
NCDOT Project HB-0039

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

The undertaking is located in New Hanover and Brunswick Counties in North Carolina and involves proposed replacement of a bridge that crosses the Cape Fear River, connecting the cities of Wilmington and Leland and points beyond. It may affect historic properties that include the bridge itself, the adjacent Wilmington Historic District, and the nearby USS North Carolina, a National Historic Landmark (NHL). No tribal lands are involved in the undertaking.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

Seth Wilcher, Preconstruction and Environment Specialist
Federal Highway Administration
310 New Bern Avenue
Raleigh, NC 27601
seth.wilcher@dot.gov

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The N.C. Department of Transportation (NCDOT) proposes replacing Bridge 13 over the Cape Fear River on US 17/US 76/US 421 in New Hanover and Brunswick counties. The existing bridge was constructed in 1969 and has been classified as functionally obsolete by the National Bridge Inventory (NBI). The proposed project is approximately 0.66 miles in length with a proposed design speed of 50 miles per hour on the bridge.

An NCDOT 2020 Feasibility Study for the project stated the bridge replacement is needed to accommodate the high growth areas of New Hanover and Brunswick Counties and truck traffic increases that support the growing population, military preparedness, and port activities in southeastern North Carolina. The corridor is a part of the Strategic Highway Network (STRAHNET) for military transportation and serves as a strategic corridor for hurricane evacuation. The 2021 annual average daily traffic (AADT) on the bridge was approximately 69,000 vehicles, including 8,280 trucks, according to the NBI. Traffic volumes are projected to increase to 94,900 by 2050, based on the 3.27% annual growth rate projected by the NBI.

The purpose of the proposed project is to replace the functionally-obsolete US 17/76/421 bridge over the Cape Fear River (Cape Fear Memorial Bridge) and to address the forecasted capacity needs of the bridge corridor. Repair and maintenance costs are expected to increase as the bridge ages and traffic increases. In 2019, approximately \$15 million was spent on a major rehabilitation for the bridge, and average annual maintenance costs were estimated at \$550,000. NCDOT recently completed a major deck rehabilitation in Spring 2024 with an estimated construction cost of \$15 million.

Two alternatives are currently under consideration for the replacement bridge. Each alternative includes the following typical section: three 12-foot lanes in each direction separated by a 22-foot median including 11-foot inside shoulders, 15-foot multi-use path on the north side of the bridge, and 12-foot outside paved shoulders.

Alternative A would consist of a movable span similar to the existing bridge, with a vertical clearance of 65-feet when closed and 135-feet when raised. Alternative B would consist of a fixed span 135-foot vertical clearance structure with trumpet interchange improvements. Each alternative would slightly modify the existing eastern loop ramps at South Front Street and tie into the current one-way pair of Wooster Street and Dawson Street in downtown Wilmington. Across the river, the bridging of Eagles Island wetlands would extend to the US 17/US 76/US 421 interchange, with possible ramp modifications

to that interchange with Alternative B. NCDOT also considered a third alternative, which would have consisted of a fixed structure at the lowest height (between 65- and 135-feet) that could meet permit requirements set forth by the U.S. Coast Guard (USCG) and U.S. Army Corps of Engineers (USACE).

In accordance with Section 14 of the Rivers and Harbors Act of 1899, 33 U.S.C. 408 (Section 408), NCDOT coordinated with USACE and USCG in May 2025. A Navigation Impact Report was prepared for the project that detailed characteristics of waterways upstream, downstream and within the project study area, identified and interviewed users of the waterway, and discussed potential impacts and improvements to navigation at the proposed bridge site. This report was used by USCG to provide feedback on the proposed alternatives. NCDOT also initiated the USACE Section 408 consultation process to determine permissible horizontal and vertical clearances for a replacement bridge.

Based on a technical analysis and review performed by USACE, it determined that the construction of a bridge with a vertical clearance less than 135-feet would be “injurious to the purposes” of its federal project and could therefore not be permitted. The USCG bridge permit decision is informed by USACE’s determination under Section 408. In May 2025, USCG similarly issued a Preliminary Navigation Clearance Determination (PNCD) which stated that any proposed drawbridge or fixed bridge should provide at least 135-feet of vertical clearance and at least 400-feet of horizontal clearance. It stipulated that if a drawbridge is proposed, the drawbridge should provide at least 65-feet of vertical clearance in the closed position. As such, the potential third action alternative was dismissed from further consideration because it could not be successfully permitted by USCG and USACE.

FHWA is the lead federal agency for the undertaking, as the project was selected for a \$242 million grant in 2024. FHWA invited USCG and USACE to participate in this proposed project PA, but each declined.

8. Describe the Area of Potential Effects (APE):

The proposed project study area for overall compliance with the National Environmental Policy Act (NEPA) was developed in coordination with appropriate state and federal agencies and is shown in the attached Figure 1. The project study area ranges between approximately 750 - 2,700 feet wide and begins just east of Alligator Creek and extends approximately 3 miles east along US 17/76/421 to the project study area terminus near S 6th Street in downtown Wilmington. The project study area also extends along the following intersecting roads:

- Approximately 2,200 linear feet north along US 17
- Approximately 1,800 linear feet south along S Front Street
- Approximately 900 linear feet south along S 3rd Street, S 4th Street, and S 5th Avenue

In additional discussions with the North Carolina Historic Preservation Office (NC HPO), FHWA and NCDOT agreed that potential effects related to changes in viewshed, traffic, and noise may extend beyond the study area developed for NEPA purposes and would be considered, as appropriate, as the project design advances and more details are available.

9. Describe steps taken to identify historic properties:

NCDOT architectural history staff prepared an ‘Effects Required’ form for the project in August 2023. The project study area falls within the NRHP-listed Wilmington Historic District. The existing Cape Fear Memorial Bridge is a contributing resource within this district and has been recommended for individual eligibility as well. Many other structures in downtown Wilmington are also considered contributing resources. Additionally, the USS North Carolina Battleship, an NRHP-listed resource and NHL, is located approximately 0.6 miles north of the project on the west side of the Cape Fear River, within the viewshed

of the existing and proposed bridges.

NCDOT archaeology staff conducted a screening of the project on August 4, 2023 and issued a 'No Archaeological Survey Required' form, as a majority of the project study area has already been surveyed for other adjacent projects (terrestrial and underwater). Over forty archaeological sites have been recorded within 1/2 mile of the proposed project, most of which are elements of the Wilmington Historic Shipwreck District, which falls within the boundary for the NRHP-listed Wilmington Historic District. Notably, two shipwrecks fall within the project study area – BW1113 – Little Barge and BW1114 – Government Barge) on the west bank of the Cape Fear River north of US 421.

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

The **Wilmington Historic District** is one of the largest and most architecturally rich NRHP districts in the United States. First listed in 1974 and significantly expanded in 2003, it encompasses roughly 1,070 acres and spans more than 230 blocks in downtown Wilmington along the Cape Fear River. The district serves as a visual timeline of Wilmington's evolution from an 18th-century colonial port into North Carolina's largest commercial city in the late 19th and early 20th centuries.

The **Cape Fear Memorial Bridge** serves as the southern gateway to downtown Wilmington and has been determined eligible for individual listing on NRHP because of its unique engineering, historical status as a local icon, and its role as a contributing resource to the surrounding historic landscape. Completed in 1969, it is a Polygonal Warren Through Truss vertical-lift bridge. It features a 408-foot central lift span suspended between two steel towers that rise 160 feet above the river. It is the only remaining operational vertical-lift highway bridge in North Carolina and represents mid-20th-century movable bridge engineering in the state. In its resting position, the bridge sits 65 feet above the water, allowing smaller recreational boats and tugs to pass freely without disrupting vehicular traffic. For larger vessels, the center span can be lifted to a maximum vertical clearance of 135 feet.

The **USS North Carolina** is World War II battleship permanently moored across the river from downtown Wilmington and has been designated as an NHL. It serves as the state's foremost memorial to its WWII veterans. Commissioned in 1941, it was the first newly constructed American battleship to enter service during World War II. Its sleek, heavily armed design set the standard for modern fast battleships that could keep pace with rapid aircraft carrier task forces during World War II.

The **Wilmington Historic Shipwreck District** falls within the boundary of the NRHP-listed Wilmington Historic District. Additional details are withheld from the general public due to the sensitive nature of the underwater archaeological resources, but are available upon request to archaeologists meeting Secretary of Interior qualifications.

11. Describe the undertaking's effects on historic properties:

FHWA, NCDOT, and NC HPO have conducted preliminary discussions about potential project effects to architectural resources; however, the project PA proposed in this correspondence will serve as a vehicle to further those discussions and reach an effect finding under Section 106 to include coordination with consulting parties that choose to participate in the project PA, as well as the ACHP.

With regard to archaeological resources, NCDOT archaeologists' review of previous surveys in the APE found that there is a low probability for significant prehistoric and/or historic archaeological materials to be present within the project study area and that the study area is unlikely to contain intact and significant archaeological resources. Design plans, once available, will be provided to NCDOT archaeologists for

review to confirm its determination remains valid.

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

Under either action alternative, the project would result in an adverse effect because it includes removal of the existing Cape Fear Memorial Bridge. FHWA, NCDOT, and the North Carolina SHPO have conducted preliminary discussions about other potential project effects; however, the project PA proposed in this correspondence will serve as a vehicle to further those discussions and reach a detailed effect finding under Section 106. This will allow for coordination with consulting parties that choose to participate in the project PA and recognizes that effects will be influenced by which alternative is chosen, and then further influenced by refinement of the designs for the selected alternative.

To date, NCDOT revised its initial conceptual design for the alternative that includes a 135-foot fixed structure to avoid original design elements that would have resulted in the loss of multiple structures that contribute to the Wilmington Historic District. Avoidance and minimization efforts are ongoing, and mitigation measures commensurate with effects will be developed as part of the project PA.

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawaiian organizations, or the public, including any correspondence from the SHPO and/or THPO.

Tribal coordination was initiated with the Catawba Indian Nation on August 30, 2023. A response was received on October 3, 2023, noting no immediate concerns but the Catawba should be notified if Native American artifacts and/or human remains are located during ground disturbance for the project.

Potential consulting parties were identified by NCDOT and FHWA and invited to participate in the Section 106 process via email on March 15, 2024. Those contacted included Eagles Island Coalition Conservation Planning Committee, Gullah Geechee Cultural Heritage Corridor Commission, Historic Wilmington Foundation, Inc. (HWF), National Park Service (NPS), Cape Fear River Watch, USS North Carolina Battleship Commission, City of Wilmington Historic Preservation Commission (HPC), and the Wilmington Metropolitan Planning Organization (MPO). Affirmative responses were received from HWF, City of Wilmington HPC, and USS North Carolina Battleship Commission. No other responses were received. All the parties listed above are being contacted again with an invitation to participate in the project PA now proposed for this undertaking.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

As stated previously, consulting parties were identified and contacted in 2024. In the interim, FHWA and NCDOT have had preliminary discussions with NC SHPO regarding the project and are now reaching out again to consulting parties with an invitation to participate in a project PA. The transportation agencies and SHPO worked together in late 2025 and early 2026 to develop a draft of the project PA. Consulting parties and the ACHP will now have an opportunity to review and comment on the draft and participate in the ongoing Section 106 process.

Both FHWA and the NC HPO have had ongoing, informal discussions with HWF over the last two years

to answer questions about the project and hear concerns about potential effects. HWF has shared many concerns about the project and its potential effects on historic properties. It expressed strong support for the alternative that was ultimately dismissed from consideration due to its inability to secure required permits from USCG and USACE. Of the two remaining action alternatives, it prefers a bridge replacement that would feature a raisable structure similar to the existing bridge. It opposes a new fixed span structure that it views as more impactful.

FHWA, NCDOT, and NC HPO also recently responded to comments received in early June 2026 from the City of Wilmington's planning and preservation staff to discuss the project and informed them that they could expect the draft project PA in the near future. No other discussions have occurred to date.

Contact information for confirmed and potential consulting parties is as follows:

Confirmed Consulting Parties

City of Wilmington Historic Preservation Commission (HPC)

Ben Riggle, Planning Manager, Historic Preservation
ben.riggle@wilmingtonnc.gov

Historic Wilmington Foundation, Inc. (HWF)

Carol Bullock, Executive Director
bullock@historicwilmington.org

USS North Carolina Battleship Commission

Jay Martin, Executive Director
exdir@battleshipnc.com

Potential Consulting Parties

National Park Service (NPS)

Ellen Rankin, Architectural Historian
gwilym_rankin@nps.gov

Eagles Island Coalition Conservation Planning Committee

Kristina Fischer, Chair
kristina.fischer@ncagr.gov

Gullah Geechee Cultural Heritage Corridor Commission

Djuanna Brockington, Executive Director
info@gullahgeecheecorridor.org

Cape Fear River Watch

Kemp Burdette, Executive Director
kemp@cfrw.us

Wilmington Metropolitan Planning Organization

Mike Kozlosky, Executive Director
Mike.Kozlosky@wilmingtonnc.gov

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

The project website is as follows:

<https://www.ncdot.gov/projects/cape-fear-bridge-replacement/Pages/default.aspx>

NCDOT hosted two public meetings in October 2024 to introduce the public to the undertaking and gather input on preliminary designs. An additional public meeting is expected to be held later this year in conjunction with the release of an Environmental Assessment (EA) being prepared as part of the NEPA process.

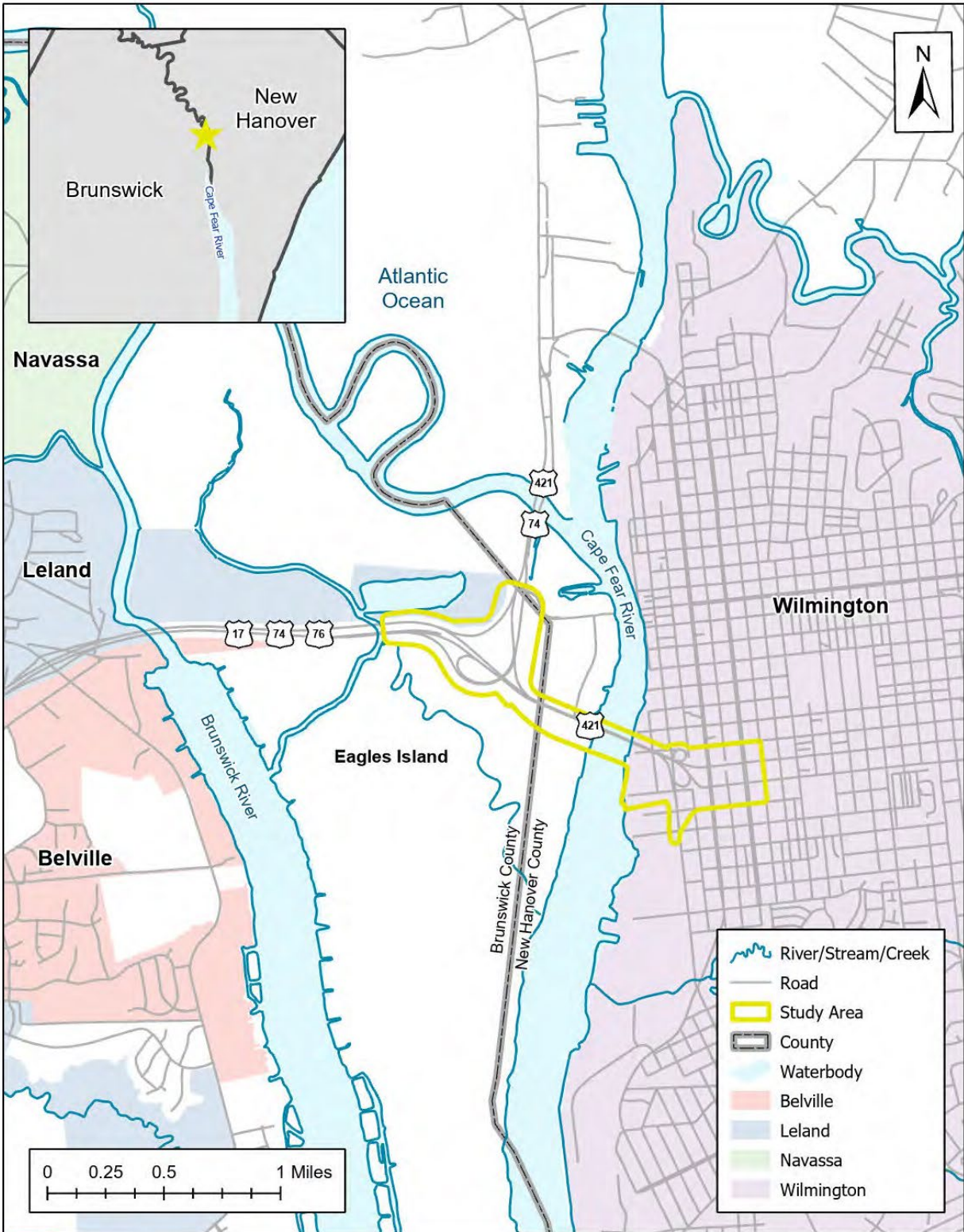
16. Is this undertaking considered a “major” or “covered” project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

The project is considered a ‘major’ project by FHWA, as the current costs estimates are in excess of \$1 billion. The link to the dashboard is as follows:

<https://www.permits.performance.gov/permitting-project/dot-projects/cape-fear-memorial-bridge-replacement>

The following are attached to this form (check all that apply):

- ☐ Section 106 consultation correspondence
- ☒ Maps, photographs, drawings, and/or plans
- ☐ Additional historic property information
- ☐ Consulting party list with known contact information
- ☐ Other: Click here to enter text.



VICINITY MAP

HB-0039 | BRUNSWICK & NEW HANOVER COUNTY

FIGURE 1

