

Appendix F: Cultural Resources Technical Memorandum

State Route 19

Environmental Assessment

*From East of Eastland Avenue to East of SR-87
Lauderdale and Haywood Counties, Tennessee*

PIN 102251.00



TN

TDOT

Department of
Transportation



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- Attachment A TDOT Cultural Resources (Historic Preservation) Section Coordination, TN-SHPO Coordination, and Supporting Materials
- Attachment B TDOT Cultural Resources (Archaeology) Section Coordination, TN-SHPO Coordination, and Supporting Materials
- Attachment C TDOT Cultural Resources (NAC) Section Coordination

1.0 Introduction

The Tennessee Department of Transportation (TDOT), in cooperation with the Federal Highway Administration (FHWA), is proposing improvements to approximately 15.2 miles of State Route (SR) 19 from east of Eastland Avenue in Lauderdale County to east of SR-87 in Haywood County, Tennessee (**Figure 1**). Since the proposed project would be funded in part with federal transportation funds, it is subject to the requirements of the National Environmental Policy Act (NEPA). An Environmental Assessment (EA) is being prepared in accordance with NEPA to identify and evaluate the environmental effects of the proposed project and to identify measures to minimize harm.

This technical memorandum identifies potential Cultural Resources within the limits of the SR-19 project area and provides an estimated impact determination for both the No-Build and Build Alternatives.

1.1 Project Background

On February 1, 2018, the FHWA approved a D-List Categorical Exclusion for the proposed widening of SR-19 from east of Eastland Avenue to east of SR-87 under TDOT project identification number (PIN) 102251.00.

Since the approval of 2018 D-List CE, the proposed SR-19 project has been divided into three segments for funding purposes; PIN 102251.01, 102251.02, and PIN 102251.03. The current EA effort is analyzing entirety of the proposed SR-19 corridor from east of Eastland Avenue to east of SR-87 (PIN 102251.00) which is comprised of PIN 102251.01, PIN 102251.02, and PIN 102251.03 (**Figure 2**).

For more information on the project background, please refer to Chapter 1 in the EA.

Figure 1 Project Location

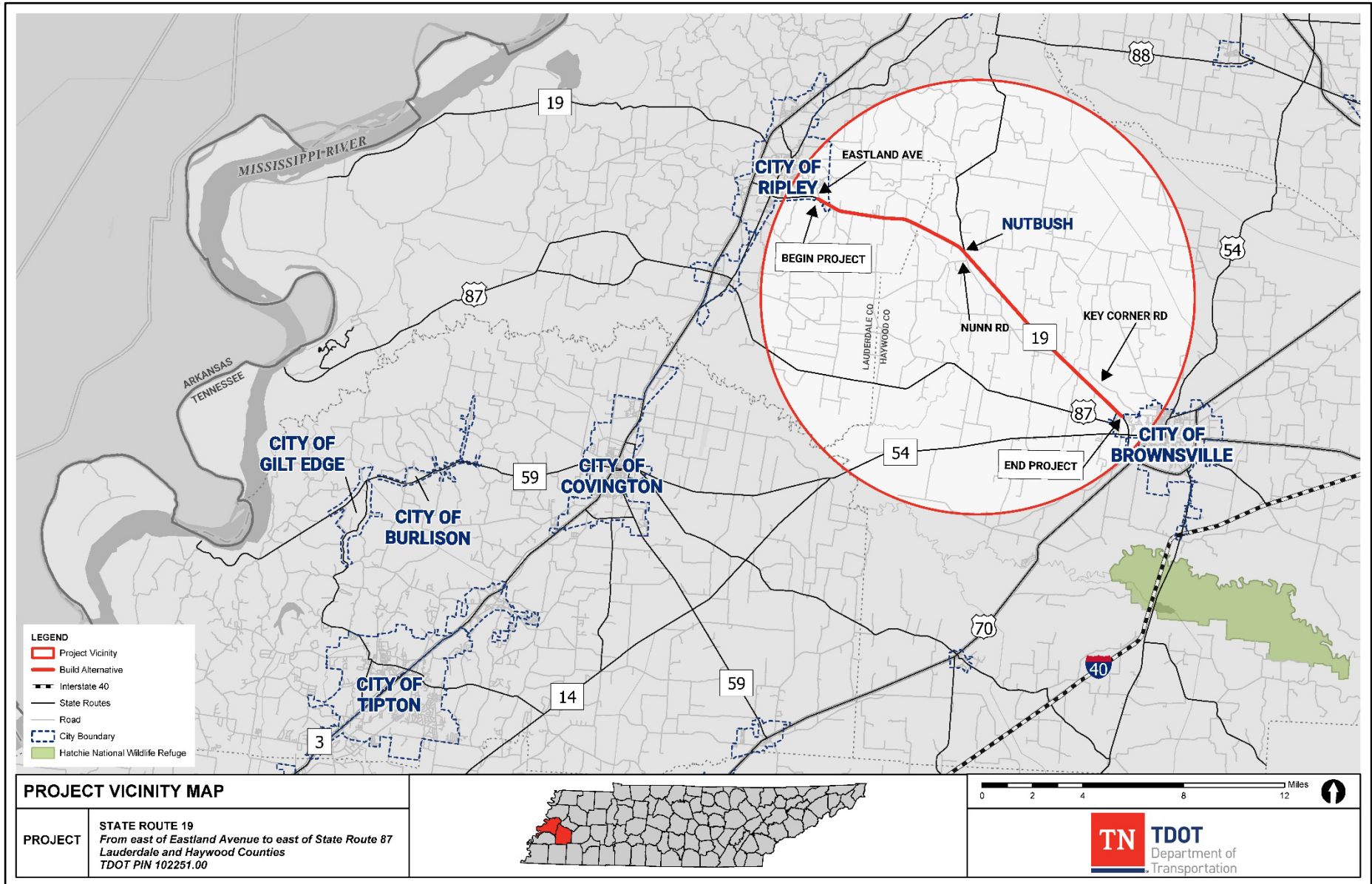
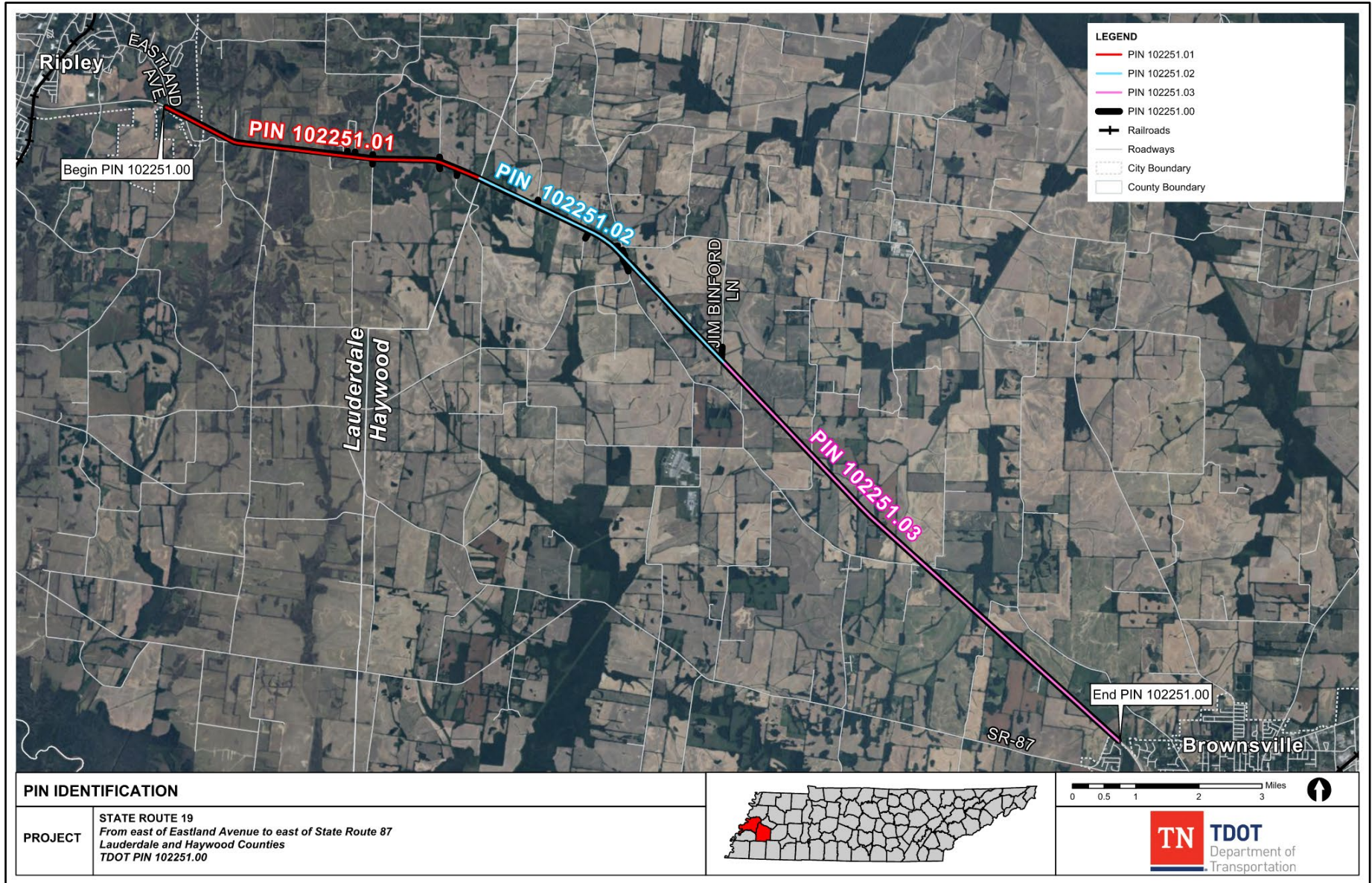


Figure 2 PIN Identification



1.2 Alternatives Under Consideration

A No-Build Alternative and one Build Alternative are being evaluated in the EA. Each alternative is described in the subsequent text below.

1.2.1 No-Build Alternative

The No-Build Alternative would leave the segment of SR-19 from east of Eastland Avenue to east of SR-87 as it currently exists except for routine maintenance and safety upgrades, as needed, or modifications that have been programmed and approved for implementation through TDOT's 25-Year Long Range Transportation Policy Plan, State Transportation Improvement Program (STIP), or TDOT 10-Year Project Plan. The No-Build Alternative is required by federal regulations to be evaluated in the EA and provides a baseline for comparing other alternatives.

1.2.2 Build Alternative

The Build Alternative proposes various roadway improvements along SR-19, from east of Eastland Avenue to east of SR-87. Proposed improvements would include widening, resurfacing, realignment of select intersections, and slope improvements (**Figure 3**).

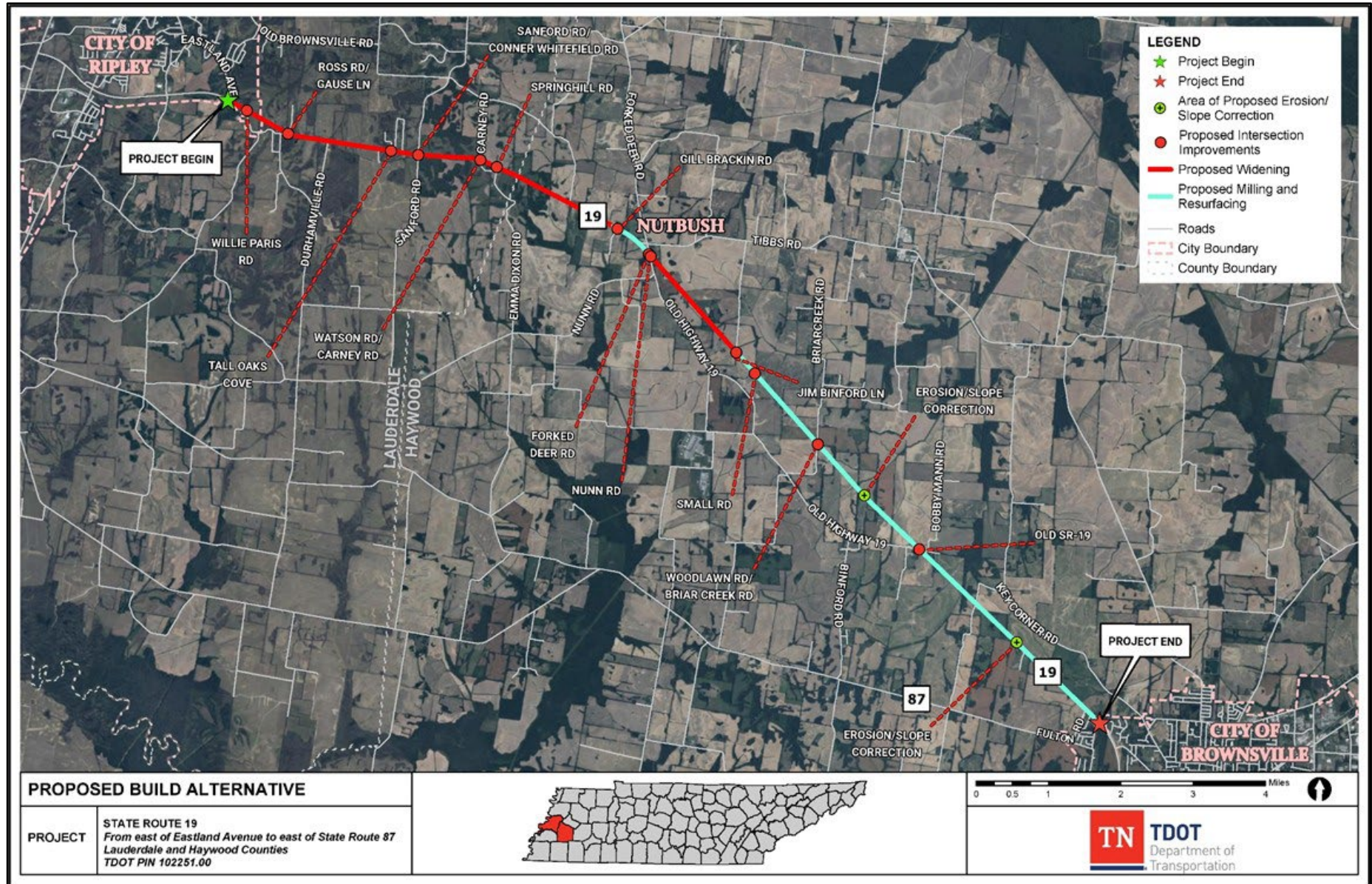
From east of Eastland Avenue in Lauderdale County to just west of Gill Brackin Road in Haywood County, the proposed project would widen the existing 11-foot travel lanes (one in each direction) to two 12-foot travel lanes with 2-foot to 10-foot shoulders (8-foot paved). Along this segment of the proposed project, the roadway would be widened primarily to the north side of the existing roadway in the Lauderdale County portion and to the south side in Haywood County. In this section, the following intersections are proposed to be realigned:

- Willie Paris Road
- Ross Road/Gause Lane
- Tall Oaks Cove
- Sanford Road/Conner Whitefield Road
- Watson Road/Carney Road
- Springhill Road

From just west of Gill Brackin Road to Nunn Road, the proposed project would mill and resurface the existing 11-foot travel lanes and 2-foot shoulders. In this section, the following intersections are proposed to be realigned:

- Forked Deer Road (SR-180)
- Nunn Road

Figure 3 SR-19 Improvement Locations



From Nunn Road to east of Jim Binford Lane, the proposed project would widen the existing roadway to two 12-foot travel lanes with 10-foot shoulders (8-foot paved). In this section, the following SR-19 intersection is proposed to be realigned:

- Jim Binford Lane

From east of Jim Binford Lane to east of SR-87, the proposed project would mill and resurface the existing 11-foot travel lanes and 2-foot shoulders. Additionally, the proposed project would correct erosion/slope issues from approximately 4,351 feet east of Woodlawn Road to approximately 4,411 feet west of Old SR-19 (approximately 1,700 feet) and from approximately 3,417 feet east of Patton Road to approximately 279 feet east of Westpointe Road (approximately 1,800 feet). In this section, the following intersections are proposed to be realigned:

- Small Road at SR-19
- Woodlawn Road/Briar Creek Road at SR-19
- Old SR-19 at SR-19

1.3 Environmental Technical Study Area

An Environmental Technical Study Area (ETSA) was developed for the proposed SR-19 project in order to document natural, cultural, and community resources within a broader study area than the immediate proposed project footprint. Generally, the ETSA boundary is 250 feet on either side of the proposed centerline, 300 feet from the project termini, and 150 feet from intersections with sideroads. That way, if shifts to the proposed project design occur during project development, TDOT staff are aware of any resources that are present in the larger ETSA boundary.

2.0 Historic Preservation

2.1 Environmental Studies Request

An Environmental Studies Request (ESR) (**Attachment A**) was submitted to TDOT's Cultural Resources (Historic Preservation) Section on February 3, 2025, based on the 2024 Line and Grade plans reflecting the project design at that time. Following changes to the proposed project design, Revised Line and Grade plans from July 2025 were provided to the TDOT Cultural Resources Section. The TDOT Cultural Resources Section (Historic Preservation) was still completing surveys for the original ESR at the time that the updated design was shared in July 2025. On August 14, 2025, the TDOT Cultural Resources Section (Historic Preservation) provided an email stating that they didn't need to revise their reports based on the updated plans and that they were working on finishing up one final report (**Attachment A**). The TDOT Cultural Resources Section (Historic Preservation) provided the following response on October 23, 2025:

"This project was studied under three child PINs:

For PIN 102251.01, in a letter dated July 28, 2025, the TN-SHPO concurred that there are no architectural resources eligible for listing in the National Register of Historic Places that would be affected by the proposed project.

For PIN 102251.02, in a letter dated October 23, 2025, the TN-SHPO concurred that the APE included three properties listed in or eligible for listing in the National Register of Historic Places: the Woodlawn Baptist Church, the Nutbush Gin, and the Nutbush Grocery. The SHPO agreed that project as currently proposed will not adversely affect any of these resources.

For PIN 102251.03, in a letter dated April 24, 2025, the TN-SHPO concurred that there are no architectural resources eligible for listing in the National Register of Historic Places that would be affected by the proposed project.

Should there be changes to scope or ROW and easements, further Section 106 coordination may be required."

The TDOT Historic Preservation ESR response dated October 23, 2025, the Tennessee SHPO (TN-SHPO) letters dated July 28, 2025, October 23, 2025, and April 24, 2025, and the Level 1 Architectural Survey Reports conducted April 2025 (102251.01), October 2025 (102251.02) and December 2024 (102251.03) can be found in **Attachment A**.

2.2 Impacts to Historic Architectural Resources

2.2.1 No-Build Alternative

The No-Build Alternative would not make changes to the existing roadway network. Therefore, the No-Build Alternative would have no effect on any National Register of Historic Places (NRHP) listed or eligible historic or architectural resources.

2.2.2 Build Alternative

Table 1 shows the NRHP listed and eligible properties within Section 2 (PIN 102251.02) of the proposed project’s APE.

Table 1 NRHP Listed and Eligible Properties Within APE¹

Resource	Address	NRHP Eligibility
Woodlawn Baptist Church	11007 Highway 19, Brownsville, Tennessee	NRHP listed
Nutbush Gin	11106 Highway 19, Brownsville, Tennessee	NRHP eligible
Nutbush Grocery Store	11106 Highway 19, Brownsville, Tennessee	NRHP eligible

Woodlawn Baptist Church was listed in the NRHP in 2024. It is locally significant under Criterion C as it embodies a vernacular rural interpretation of the Gothic Revival Style, which is not a common form throughout rural Haywood County.

The Nutbush Gin has been determined NRHP eligible under Criterion A for its local significance to the cotton industry and is considered a good active representation of a 20th century cotton gin complex.

The Nutbush Grocery Store has been determined NRHP eligible under Criterion A at the local level as a representative example of early 20th century rural commercial development patterns.

The TN-SHPO, in a letter dated October 23, 2025, stated the Build Alternative would not adversely affect the Woodlawn Baptist Church, Nutbush Gin, or Nutbush Grocery Store.

¹ Level 1 Architectural Survey Reports (October 2025, April 2025, and December 2024) in **Attachment A**.

The Build Alternative would not result in a Section 4(f) use of the Woodlawn Baptist Church, Nutbush Gin, or Nutbush Grocery Store.

2.3 Minimization and Mitigation Measures to Address Impacts

Current avoidance and minimization strategies adequately mitigate anticipated environmental impacts. Therefore, further technical studies are not required. However, if ROW shifts in nature, their disposition shall be subject to all applicable regulations, such as Section 106 of the National Historic Preservation Act (NHPA)², and its implementing regulations in the CFR (36 CFR § 800)³.

2.4 Historic Architectural Impacts Summary

Table 2 summarizes potential impacts to historic and architectural resources under the No-Build Alternative and the Build Alternative as well as proposed minimization and mitigation measures to address impacts, as necessary.

² <https://www.achp.gov/protecting-historic-properties>

³ <https://www.ecfr.gov/current/title-36/chapter-VIII/part-800?toc=1>

Table 2 Historic Preservation Impacts Summary

	No-Build Alternative	Build Alternative	
Impact Category	Effect Determination	Effect Determination	Minimization/Mitigation Measures to Address Impacts
Historic Preservation	No Effect	No Adverse Effect. The project as currently proposed would not adversely affect any NRHP listed or eligible historic architectural resources.	Current avoidance and minimization strategies adequately mitigate anticipated environmental impacts. Therefore, further technical studies are not required. However, in the event that right-of-way shifts, their disposition shall be subject to all applicable regulations such as Section 106 of the National Historic Preservation Act (NHPA) and the implementing regulations in the CFR (36 CFR § 800).
Section 4(f) of the U.S. Department of Transportation (DOT) Act of 1966	No Effect	No Effect. The project as currently proposed would not adversely affect any NRHP listed or eligible historic or architectural resources therefore, the project would not result in a Section 4(f) use for any NRHP listed or eligible historic architectural resources.	Not Applicable.

3.0 Archaeological Resources

3.1 Environmental Studies Request

An ESR was submitted to TDOT's Cultural Resources (Archaeology) Section on February 3, 2025, based on the 2024 Line and Grade plans reflecting the project design at that time. The TDOT Cultural Resources (Archaeology) Section provided the following response to the ESR on February 27, 2025:

"Based on a review of the 5/16/2024 Environmental Technical Study Area (ETSA), the SHPO letter dated 03/07/2011 remains valid. The project APE [Area of Potential Effect] does not contain any archaeological resources listed or eligible for listing in the National Register of Historic Places as currently proposed. Should project plans change, then the project will need to be reevaluated by TDOT Archaeology."

Following changes to the proposed project design, Revised Line and Grade Plans from July 2025 were provided to the TDOT Cultural Resources Section. In an email dated August 14, 2025, a representative of the TDOT Cultural Resources (Archaeology) Section stated, *"Archaeology studies remain valid."*

Copies of the TDOT Cultural Resources (Archaeology) Section ESR response dated February 27, 2025, and email dated August 14, 2025, are in **Attachment B**.

3.2 Impacts to Archaeological Resources

3.2.1 No-Build Alternative

The No-Build Alternative would not make changes to the existing roadway network. Therefore, the No-Build Alternative would have no effect on NRHP listed or eligible archaeological resources.

3.2.2 Build Alternative

Table 3 shows the archaeological sites within proposed project’s APE. None of the sites are listed in the NRHP or determined to be eligible for the NRHP.

Table 3 Archaeological Sites within APE

Site ID	Site Description	NRHP Eligibility
40LA207	Tenant Period surface scatter	Not eligible
40LA208	Tenant Period surface scatter	Not eligible
40LA209	Tenant Period surface scatter	Not eligible
40HD165	Edward Grove Cemetery	Not eligible
40HD166	Tenant Period surface scatter	Not eligible
40HD167	Tenant Period surface scatter	Not eligible
40HD168	Tenant Period surface scatter	Not eligible

3.3 Minimization and Mitigation Measures to Address Impacts

No NRHP listed or eligible archaeological resources would be adversely affected by the Build Alternative and no mitigation measures would be required.

3.4 Archaeological Resource Impacts Summary

Table 4 summarizes potential impacts to archaeological resources under the No-Build Alternative and the Build Alternative as well as proposed minimization and mitigation measures to address impacts, as necessary.

Table 4 Archaeological Resource Impacts Summary

Impact Category	No-Build Alternative	Build Alternative	
	Effect Determination	Effect Determination	Minimization/Mitigation Measures to Address Impacts
Archaeological Resources	No Effect	No Effect. None of the archaeological sites within the APE are NRHP listed or eligible for listing.	Not Applicable

4.0 Native American Consultation (NAC)

4.1 Environmental Studies Request

An ESR was submitted to TDOT's Cultural Resources (NAC) Section on February 3, 2025, based on the 2024 Line and Grade plans reflecting the project design at that time⁴. The TDOT Cultural Resources (NAC) Section provided the following response to the ESR on October 24, 2025:

"An invitation to participate in the Section 106 process for PIN 102251.01 was sent on July 2, 2024 to all federally recognized Native American tribes with interests in the subject county: Absentee-Shawnee Tribe of Indians in Oklahoma, Cherokee Nation, The Chickasaw Nation, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, The Quapaw Nation, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians in Oklahoma.

On July 8, 2024, the Quapaw Nation responded with a finding of "no effect" to known properties of significance. The Quapaw Nation requested to be contacted in the event of an inadvertent archaeological finding.

The Chickasaw Nation responded and accepted the invitation to be a consulting party on July 25, 2024. Cultural resources reports were sent to this consulting party on October 24, 2025.

On August 19, 2024, the Eastern Shawnee Tribe responded with a finding of "no adverse effect." The Eastern Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

On August 19, 2024, the Shawnee Tribe responded and concurred that no known properties of significance will be negatively impacted by this project. The Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

An invitation to participate in the Section 106 process for PIN 102251.02 was sent on July 2, 2024, to all federally recognized Native American tribes with interests in the subject county: Absentee-Shawnee Tribe of Indians in Oklahoma, The Chickasaw Nation, Eastern Shawnee Tribe

⁴ TDOT Cultural Resources (NAC) was still completing surveys during the original ESR, and their response is based off of the newest design changes in provided in July of 2025.

of Oklahoma, Jena Band of Choctaw Indians, Kialegee Tribal Town, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians in Oklahoma.

The Chickasaw Nation responded and accepted the invitation to be a consulting party on July 16, 2024. Cultural resources reports were sent to this consulting party on October 24, 2025.

On August 19, 2024, the Eastern Shawnee Tribe responded with a finding of “no adverse effect.” The Eastern Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

On August 19, 2024, the Shawnee Tribe responded and concurred that no known properties of significance will be negatively impacted by this project. The Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

An invitation to participate in the Section 106 process for PIN 102251.03 was sent on July 2, 2024, to all federally recognized Native American tribes with interests in the subject county: Absentee-Shawnee Tribe of Indians in Oklahoma, The Chickasaw Nation, Eastern Shawnee Tribe of Oklahoma, Jena Band of Choctaw Indians, Kialegee Tribal Town, Shawnee Tribe, Thlopthlocco Tribal Town, and United Keetoowah Band of Cherokee Indians in Oklahoma.

The Chickasaw Nation responded and accepted the invitation to be a consulting party on July 16, 2024. Cultural resources reports were sent to this consulting party on October 24, 2025.

On August 19, 2024, the Eastern Shawnee Tribe responded with a finding of “no adverse effect.” The Eastern Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

On August 19, 2024, the Shawnee Tribe responded and concurred that no known properties of significance will be negatively impacted by this project. The Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding.

To date, no other responses have been received.

In accordance with Section 106 regulations, tribes must be provided a reasonable opportunity to comment on the proposed undertaking. TDOT Cultural Resources staff will document all additional requests for information, comments, or additional communications with recognized tribes on this undertaking. TDOT will re-initiate consultation if additional cultural resources studies are required or if archaeological materials or human remains are discovered during construction.”

A copy of the ESR response can be found in **Attachment C**.

4.2 Impacts to Native American Resources

4.2.1 No-Build Alternative

The No-Build Alternative would not make changes to existing roadway network. Therefore, the No-Build Alternative would have no effect to historic properties that are either located on tribal lands or that have religious or cultural significance to Native American tribes and would not require Section 106 (NAC) Coordination^{5,6}.

4.2.2 Build Alternative

Section 106 (NAC) Coordination was sent to ten Native American Tribes on July 2, 2024, for PIN 102251.01. Three tribes responded with a finding of “no effect” and concurred that no know properties of significance would be negatively impacted by the project and requested to be contacted in the event of an inadvertent archaeological finding. The Chickasaw Nation accepted the invitation to be a consulting party on July 25, 2024.

Section 106 (NAC) Coordination was sent to eight Native American Tribes on July 2, 2024, for PIN 102251.02. Two tribes responded with a finding of “no effect” and concurred that no know properties of significance would be negatively impacted by the project and requested to be contacted in the event of an inadvertent archaeological finding. The Chickasaw Nation accepted the invitation to be a consulting party on July 16, 2024. Cultural resources reports were sent to the Chickasaw Nation on October 24, 2025.

Section 106 (NAC) Coordination was sent to eight Native American Tribes on July 2, 2024, for PIN 102251.03. Two tribes responded with a finding of “no effect” and concurred that no know properties of significance would be negatively impacted by the project and requested to be contacted in the event of an inadvertent archaeological finding. The Chickasaw Nation accepted the invitation to be a consulting party on July 16, 2024.

4.3 Minimization and Mitigation Measures to Address Impacts

The Build Alternative would not result in adverse impacts to Native American Tribes; therefore, no mitigation is proposed.

⁵ <https://www.achp.gov/protecting-historic-properties>

⁶ <https://www.govinfo.gov/content/pkg/USCODE-2013-title16/html/USCODE-2013-title16-chap1A-subchapII.htm>

Pursuant to [TCA 11-6-107\(d\)](#),⁷ if human remains are identified, construction work must be halted, and the state archaeologist, the county coroner and local law enforcement must be contacted immediately. In addition, each recognized Native American Tribe will be contacted to afford a representative the opportunity to examine and evaluate the material found.

4.4 NAC Impacts Summary

Table 5 summarizes potential impacts to Native American Resources under the No-Build Alternative and the Build Alternative as well as proposed minimization and mitigation measures to address impacts, as necessary.

Table 5 Native American Coordination Impacts Summary

Impact Category	No-Build Alternative	Build Alternative	
	Effect Determination	Effect Determination	Minimization/Mitigation Measures to Address Impacts
Native American Consultation	No Effect	No Adverse Effect. Section 106 (Native American Consultation) Coordination was sent to 10 Native American Tribes for PIN 102251.01 on July 2, 2024; 8 Native American Tribes for PIN 102251.02 on July 2, 2024, and 8 Native American Tribes on July 2, 2024 for PIN 102251.03. The Chickasaw Nation accepted the invitation to be a consulting party to PIN 102251.01 on July 25, 2024, and to PIN 102251.02 and PIN 102251.03 on July 16, 2024. On August 19, 2024, The Eastern Shawnee Tribe and the Shawnee Tribe requested to be contacted in the event of an inadvertent archaeological finding for all three project PINs.	Not applicable. Pursuant to TCA 11-6-107(d) , if human remains are identified, construction work must be halted, and the state archaeologist, the county medical examiner and local law enforcement must be contacted immediately. In addition, each recognized Native American Tribe will be contacted to afford a representative the opportunity to examine and evaluate the material found.

⁷ https://www.tn.gov/content/dam/tn/environment/archaeology/documents/TCA_Archaeology.pdf

ATTACHMENTS

THESE ATTACHMENTS CONTAIN SENSITIVE CULTURAL RESOURCE INFORMATION AND ARE
FOR AGENCY REVIEW ONLY - NOT FOR PUBLIC DISTRIBUTION