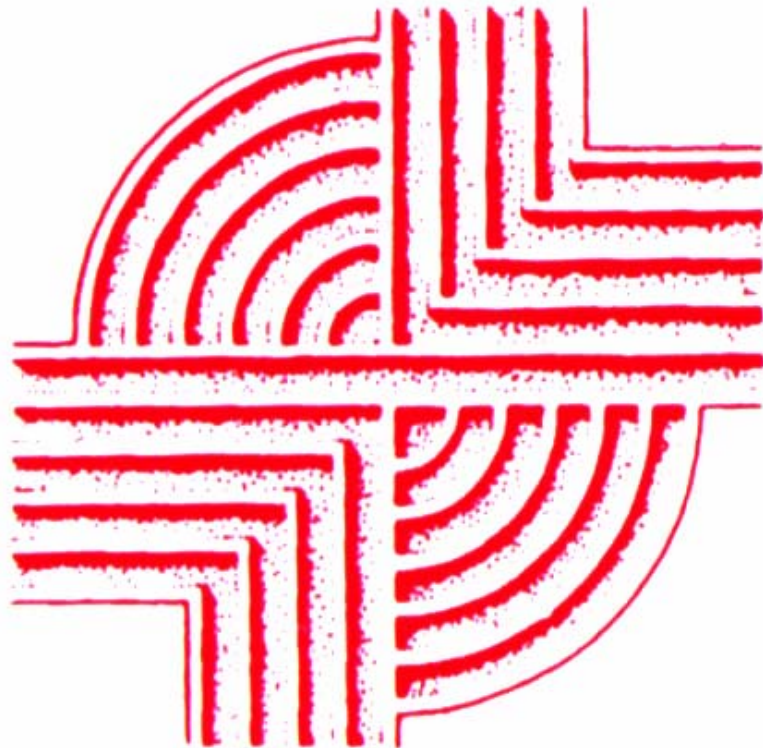


**CULTURAL RESOURCE SURVEY OF THE
CULLASAJA GORGE PROJECT, HIGHLANDS
RANGER DISTRICT, NANTAHALA NATIONAL
FOREST**



CHICORA RESEARCH CONTRIBUTION 406

**CULTURAL RESOURCE SURVEY OF THE
CULLASAJA GORGE PROJECT,
HIGHLANDS RANGER DISTRICT,
NANTAHALA NATIONAL FOREST**

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ABSTRACT

This study reports on a cultural resource survey of four project sites along US 64 on the Highlands Ranger District of the Nantahala National Forest in Macon County, North Carolina. This work, conducted for Mangi Environmental Group through an IDIQ with the U.S. Forest Service, is meant to assist the Forest Service in complying with Section 106 of the National Historic Preservation Act and the regulations codified in 36CFR800.

The project, located in western North Carolina, includes four tracts situated along an approximately 1-mile stretch of US 64 about 1.3 miles northwest of Highlands, in the southeastern portion of Macon County.

On the west side of US 64 at the Dry Falls Overlook, the Forest Service desires to change the parking configuration, perhaps with a pedestrian bridge across US 64 to the McCall Cabin area, as well as to add an additional handicapped access route. Work here would include potential modification of the existing parking area, including its grade and elevation and clearing/construction associated with a new walkway.

On the east side of US 64, directly across from the Dry Falls Overlook, on the McCall Cabin property, the Forest Service desires to create a new parking area, with pedestrian access to Dry Falls by a bridge across US 64. On this parcel the work would include clearing, grubbing, and grading associated with the parking lot and pedestrian bridge construction.

On the north side of US 64 at the Van Hook Glade Recreation Area the Forest Service desires to construct a new restroom, probably located by the side of the existing structure. This work will entail the laying of new waterlines and

utilities. In addition, there is consideration being given to increasing the number of camp sites at the facility. This work would require clearing, grubbing, grading, construction of underground utilities, and the above grade bath facilities. Creation of new camp sites would likewise require some degree of clearing, grubbing, grading, and road construction.

Further north of US 64, at the Cliffside Lake Recreation Area the Forest Service desires to install new waterlines, running close to the existing bath house and along existing walkways to existing rock and timber shelters. Construction activities would be more limited here, consisting of the placement of underground utilities.

No archaeological or architectural studies were conducted at a fifth location, Lower Cullasaja Falls, since that area consists entirely of steep slopes, likely created by blasting rock for the construction of US 64.

In addition, it is likely that there would be additional short-term construction impacts, including increased noise and dust levels, and increased construction related traffic. This study, however, only evaluates the primary affects of the project and does not include any evaluation of potential secondary affects that might result from increased visitation or use of the facilities.

For this study the area of potential effect (APE) includes the historic 737-acre Highlands Recreation Area (which contains the project tracts and an associated section of US 64).

An investigation of the archaeological site files at the Highlands Ranger District revealed that no archaeological sites were identified within the APE, although the presence of two possible graves was noted for the Cliffside Lake Recreation Area.

There were no previously recorded architectural sites listed on the Forest Service's Cultural Resource maps, although the Dry Falls, Van Hook, and Cliffside Lake project areas were each recognized to have Civilian Conservation Corps (CCC) structures located on them. US 64 through the project area is listed on the State Study List for the National Register of Historic Places (effectively meaning that the corridor is potentially eligible for inclusion on the National Register). In addition, we discovered that the Cliffside Lake Recreation Area has been recorded as an architectural site by the State Historic Preservation Office and that the Cliffside Lake Bath House has been determined by the SHPO as eligible for inclusion on the National Register.

Given the very tight time frame of this project detailed historical research was not possible. Our work relies primarily on secondary resources available at the Highlands Ranger District. We have attempted to synthesize available information on CCC activities relating to the US Forest Service. We have, however, developed a context that specifically addresses the Forest Service's involvement the CCC and the Forest Service's post-CCC recreation philosophy.

The archaeological survey of the four tracts incorporated shovel testing at 100-foot intervals on transects laid out at 100-foot intervals except where slopes were evaluated as steep (over 15%). All shovel test fill was screened through ¼-inch mesh and tests were generally 1-foot in depth where the soil permitted. Additional close-interval shovel tests were conducted in several locations where cultural remains were found on the surface. A total of 208 shovel tests were excavated in the four project areas.

As a result of these investigations, three archaeological sites were identified (31MA630 - 632). All three sites are scatters of lithics and only one contains a diagnostic specimen (dating to the Middle Archaic). These sites are recommended not eligible for inclusion on the National Register of Historic Places given their sparse data sets and lack of integrity. We recommend no additional management activities for these sites.

We have completed US Forest Service forms for CCC sites, and Intensive Survey forms for McCall Cabin, the Recreation Lots, and Bridal Veil Falls. These forms provide sufficient information for National Register evaluations and may be revised by the Forest Service as additional information becomes available.

We recommend the 737-acre Highlands Recreation Area eligible for the National Register of Historic Places as a district which possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. The Highlands Recreation Area Historic District is significant under National Register Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (it represents a significant and distinguishable entity whose components may lack individual distinction).

Within the district are buildings, sites, structures, and objects that contribute to its significance. Elements that do not contribute are generally those that were originally constructed after 1949. The district includes three areas which themselves are considered historic districts: Van Hook Glade, Cliffside, and Dry Falls, as well as the complex of natural and constructed features at Bridal Veil Falls. It also includes the McCall Cabin, although final evaluation is not possible until a planned reassembly is complete.

The section of US Highway 64 adjoining the Highlands Recreation Area is a contributing resource to the historic district.

It is our belief that the actions proposed by the Forest Service will have an adverse affect on this historic district and should be submitted to the SHPO for comment. New construction such as a pedestrian bridge or new restroom facilities should be located in such a way as not to impact the landscape, viewshed, or historic resources.

Finally, it is possible that archaeological remains may be encountered in the project area during clearing activities. Crews should be advised to report any discoveries of

concentrations of artifacts (such as bottles, ceramics, or projectile points) or brick rubble to the project engineer, who should in turn report the material to the District's Staff Archaeologist (the process of dealing with late discoveries is discussed in 36CFR800.13(b)(3)). No construction should take place in the vicinity of these late discoveries until they have been examined by an archaeologist and, if necessary, have been processed according to 36CFR800.13(b)(3).

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INTRODUCTION

This investigation was conducted by Dr. Michael Trinkley of Chicora Foundation, Inc. for Ms. Linda Erdmann of the Mangi Environmental Group. The work, conducted through an IDIQ with the U.S. Forest Service, is meant to assist the Forest Service in complying with Section 106 of the National Historic Preservation Act and the regulations codified in 36CFR800.

The project is situated on the Nantahala National Forest, Highlands Ranger District, in Macon County, western North Carolina. The project was identified on March 29 and Chicora provided a scope of work for the project on April 5. This scope was based on the available project task order documents, dated March 19, as well as phone conversation with the Forest Service's Archaeologist, Mr. Rodney Snedeker. On April 22 we were notified that the Forest Service had accepted the cultural resource proposal and that a kick-off meeting was to be held at the Highlands District office on April 26. As a part of that meeting the various project areas were toured and District Ranger Erin Bronk provided additional

the southeastern portion of Macon County. This area has historically (since at least 1949) been identified as the Highlands Recreation Area. A fifth area, Lower Cullasaja Falls, has been excluded because of steep, rocky slopes, probably resulting from blasting during the construction of US 64, and the absence of any reported Civilian Conservation Corps (CCC) structures or features in that area (Linda Erdmann, personal communication 2004; Rodney Snedeker, personal communication 2004).

On the west side of US 64 at the Dry Falls Overlook, the Forest Service desires to change the parking configuration, perhaps with a pedestrian bridge across US 64 to the McCall Cabin area, as well as to add an additional handicapped access route. Work here would include potential modification of the existing parking area, including its grade and elevation and clearing/construction associated with a new walkway. The topography in this area is generally steep with a very low potential for the identification of archaeological resources. There are, however, several site features that are thought to be associated with CCC activities, including a small rock entrance area, and rock walls and steps associated with the Dry Falls overlook.

On the east side of US 64, directly across from the Dry Falls area, on the McCall Cabin property, the Forest

Service desires to create a new parking area, with pedestrian access to Dry Falls by a bridge across US 64. On this parcel the work would include clearing, grubbing, and grading associated with

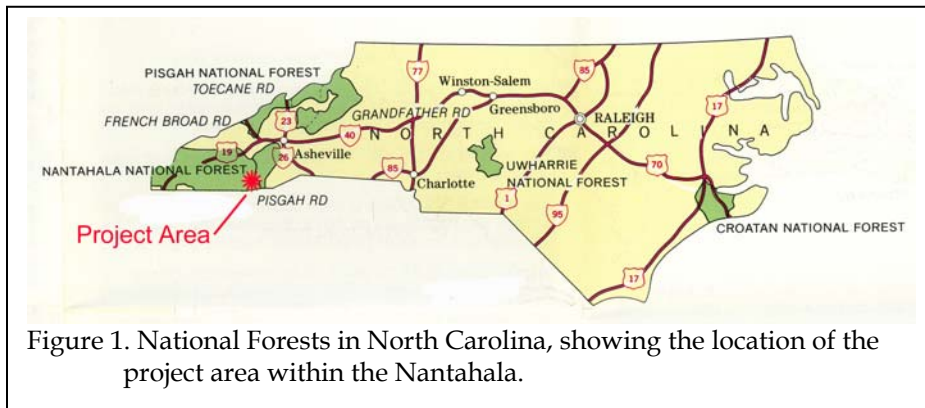


Figure 1. National Forests in North Carolina, showing the location of the project area within the Nantahala.

information concerning the nature of the project.

The project study area includes four tracts situated along an approximately 1-mile stretch of US 64 about 1.3 miles northwest of Highlands, in

CULLASAJA GORGE PROJECT, HIGHLANDS RANGER DISTRICT, NANTAHALA NATIONAL FOREST

the parking lot and pedestrian bridge construction. There are no structures on the property, although there is a potential for the recovery of arch-aeological remains. Just beyond the proposed parking area is a moved and partially rebuilt cabin for which the Forest Service desires to obtain an eligibility determination.

On the north side of US 64 at the Van Hook Glade Recreation Area the Forest Service desires to construct a new restroom, probably

project area to affect below ground archaeological sites as well as to visually or physically affect above ground historic resources.

Further north of US 64, at the Cliffside Lake Recreation Area the Forest Service desires to install new waterlines, running close to the existing bath house and along existing walkways to existing rock and timber shelters. Construction activities would be more limited here, consisting of the placement of underground utilities.

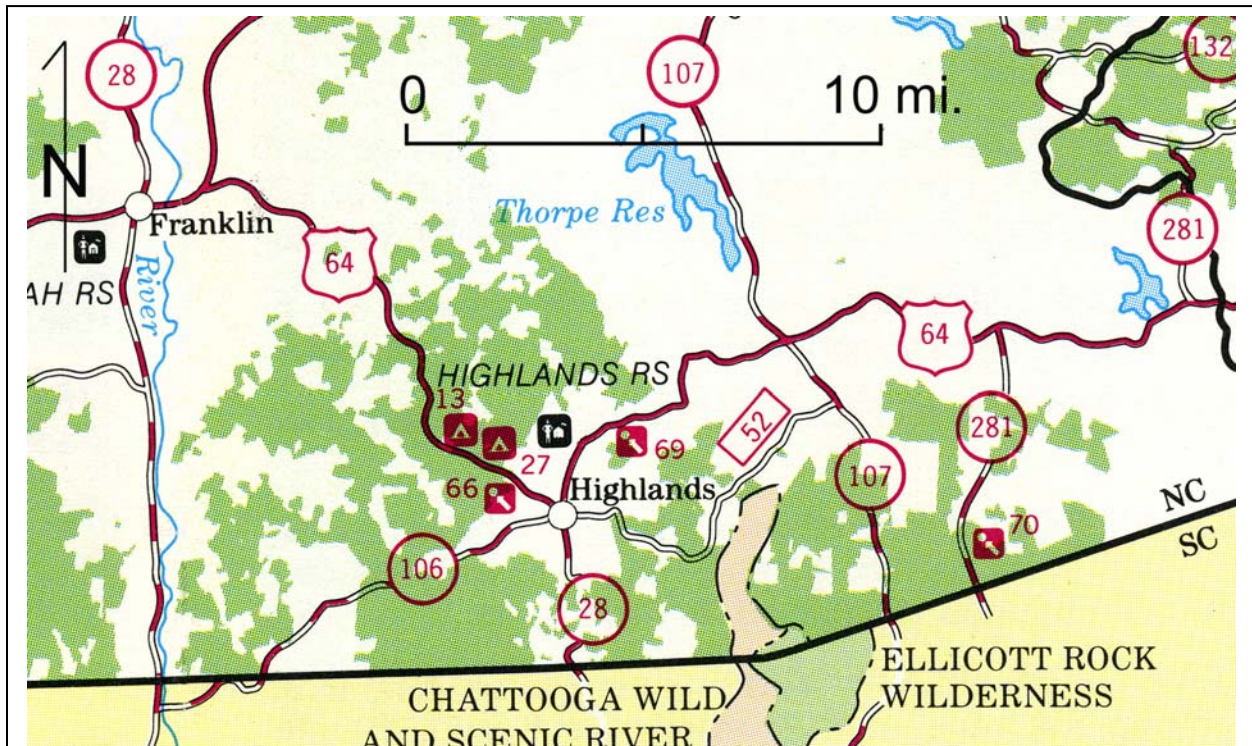


Figure 2. Area of the Highlands Ranger District on the Nantahala National Forest. Location 13 is the Van Hook Glade Recreation Area, Location 27 is Cliffside Lake Recreation Area, and Location 66 is the Dry Falls Overlook.

located by the side of the existing structure (thought to be of CCC construction). This work will entail the laying of new waterlines and utilities. In addition, there is consideration being given to increasing the number of camp sites at the facility. This work would require clearing, grubbing, grading, construction of underground utilities, and the above grade bath facilities. Creation of new camp sites would likewise require some degree of clearing, grubbing, grading, and road construction. There is the potential in this

Nevertheless, there remains the potential for physical and visual intrusions on the existing CCC architecture, as well as damaging or destroying archaeological sites that may be present. The District's Forest Service Archaeologist, Mr. David Dyson, also provided us with a report of two possible graves in the project area.

During our review of the Forest Service files at the Highlands Ranger District we found an August 29, 1989 letter from the North Carolina

INTRODUCTION

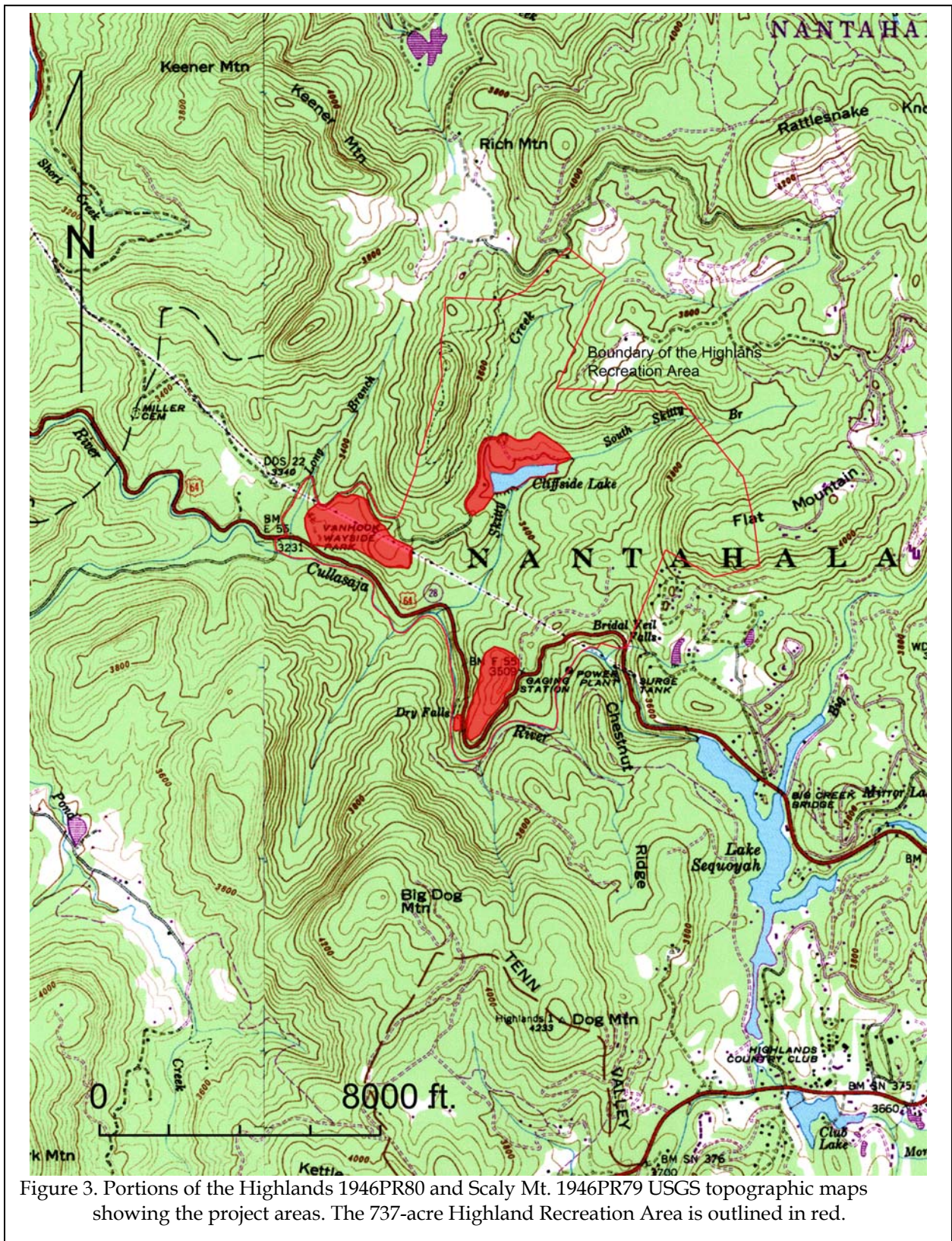


Figure 3. Portions of the Highlands 1946PR80 and Scaly Mt. 1946PR79 USGS topographic maps showing the project areas. The 737-acre Highland Recreation Area is outlined in red.

State Historic Preservation Office (SHPO) to Mr. David Hammond, Recreation Staff Officer with the Forest Service identifying the Cliffside Lakes Bathhouse as a National Register eligible property.

In addition, it has been known that the US 64 corridor is on the SHPO's State Study List. This effectively identifies the corridor as eligible for inclusion on the National Register.

As a result of this overview of the project and existing resources, we called the North Carolina State Historic Preservation Office and spoke to Ms. Renee Gledhill-Early concerning the project and the anticipated requirements of their office. We subsequently also spoke to Ms Rebecca Johnson, Survey and Planning Branch, Western Office. As a result of these conversations, it became clear that to achieve the level of coordination necessary with the SHPO, it would be critical to develop a context for the CCC buildings and recreation areas within the APE - defined as the 1-mile stretch of US 64 off which these project tracts occur. Most fundamentally, Ms. Gledhill-Early emphatically stated that their office would not provide structure by structure determinations of eligibility since these resources needed to be considered at a district level and they would not concur to piece-meal the determinations. This, of course, is consistent with Appendix E of FS-395, *The Forest Service and the Civilian Conservation Corps: 1933-42*, which states:

The differences and similarities between CCC sites make sites both uniquely and collectively important. Therefore, there are certain elements to consider when examining these sites in relation to one another. Through regional distinctions are important, so are the distinctions within each forest. For example, consider the special features and unique elements of a site. . . . It is therefore important that the Forest Service make every effort to collect all information relating

to these sites for the correct decision to be made [concerning eligibility] (Otis et al. 1986:218).

This level of research was not feasible for a study placed on the short time line provided by this contract. Our recommendations to involve the State Historic Preservation Office in planning decisions were rejected by the Forest Service and Mangi.

Consequently, this report includes an intensive archaeological study of the four project areas, evaluating the potential for archaeological resources on the tracts and, where appropriate, conducting archaeological studies using shovel testing and screening fill.

The National Register and architectural components of this study, however, including the photographs and Forest Service CCC cards, are sufficient for determining an appropriate APE. The APE for any projects within or adjacent to the Highlands Recreation Area will be the eligible district - the 737 acre Highlands Recreation Area. The boundary of the district can be historically justified in accordance with National Register Bulletin 16A, *How to Complete the National Register Registration Form*. We have also provided the Forest Service with specific recommendations for future work.

We have also **not** considered any future secondary impact of the project, including increased or expanded traffic, increasing pressure of tourism, or associated improvements that may be necessitated by additional visitation.

The project study area consists of approximately 77 acres of land - approximately nine acres at Dry Falls, 23 acres at McCall Cabin, 29 acres at Van Hook and 15 acres at Cliffside Lake. The locations of these tracts are all situated within the previously mentioned Highlands Recreation Area. For this study the area of potential effect (APE) includes the Highlands Recreation Area and the associated boundary section of US 64.

INTRODUCTION

These investigations incorporated a review of the site files at the Highlands Ranger District. No previously identified archaeological sites are located within this APE, although the SHPO has previously recorded Cliffside Lake Recreation Area. While no other architectural sites are recorded by the Forest Service, it is known that there are several CCC structures on the various tracts and that the parcels abut the US 64 corridor. In conversations with Ms. Rebecca Johnson, no architectural sites have been previously recorded in this immediate area, outside of US 64, which is on the state's study list (Rebecca Johnson, personal communication 2004) and the Cliffside Lake Recreation Area.

Archival and historical research included examination of materials at the District Ranger's Office, as well as reliance on secondary resources to provide background for the project area. No primary historical research was conducted for this project.

The archaeological survey was conducted from May 6 through May 7 by Mr. Tom Covington and Ms. Nicole Southerland under the direction of Dr. Michael Trinkley, who was also present on-site. Also participating in the study is Ms. Sarah Fick, an architectural historian.

As a result of this work three archaeological sites have been identified - all are Native American and are characterized by sparse surface lithic scatters. Shovel testing failed to identify any in situ remains or features. As a result, all three sites are recommended not eligible for inclusion on the National Register of Historic Places.

The architectural investigation of the APE was completed by Fick and Trinkley. We have identified the Highlands Recreation Area as a district that is eligible for inclusion on the National Register of Historic Places.

Laboratory work and report production was conducted at Chicora's laboratories in Columbia, South Carolina on May 10, 2004.

NATURAL ENVIRONMENT

Physiography and Geology

The project area, at the extreme southwestern edge of North Carolina, is located in Macon County. It is situated in the mountains west of the East Continental Divide (which separates water drainage west to the Mississippi River and east to the Atlantic Ocean). In the Appalachian Mountains the topography varies

dramatically, from nearly level in the floodplains to nearly vertical on sheer rock cliffs. While there are over forty peaks exceeding an elevation of 6,000 feet above mean sea level (AMSL), the bulk of the Appalachian region has elevations ranging from about 2,000 to 5,000 feet AMSL.

Macon County exhibits this same range, with mountains, low rolling hills, floodplains, and low stream terraces. In Macon County the elevations range from about 1,800 feet AMSL where the Little Tennessee flows into Swain County in the north to 5,500 feet AMSL at the top of Standing Indian Mountain.

Macon County is bordered to the north by Swain and Graham counties, to the east by Jackson County, and to the west by Clay and Cherokee counties. To the south it is bordered by Rabon County, Georgia. Although a portion of the county's boundaries follow the Chattooga River to the southeast (a small part of the county west of the town of Highlands is in the Chattooga River watershed) and the Nantahala River to the west (which is part of the Little Tennessee River drainage), most of the borders consist of divides and other features.

The Blue Ridge Province consists of mountains that are the remnants of former highlands that antedate the lower peneplains on either side (Fenneman 1938). In geological terms they are classified as "subdued," indicating that their height and steepness are so far lost that only a relatively thin mantle of



Figure 4. Dry Falls from the CCC overlook.

decayed rock remains over the underlying bedrock. Talus slopes and bare cliffs, while present, are rare. Summits are commonly rounded and true mountain peaks are infrequent. Compared to ranges such as the Rocky Mountains, the Blue Ridge is not high. Moreover, the climate in the area is far more humid and this has also helped to round the peaks.

The project area is situated in an area called Cullasaja Gorge, a reference to the narrow valley followed by the Cullasaja River (a tributary of the Little Tennessee River). In the project area the elevations range from about 3,300 feet AMSL along the Cullasaja River to 3,580 feet AMSL in the upper portions of the project setting. Topography undulates dramatically throughout the project area, in sections of steep slopes, partially at Dry Falls, on the eastern edge of the McCall Cabin tract, and along the western edge of the Cliffside Lake tract. Similarly steep slopes are found along the north edge of Cliffside Lake and in other localized areas.

The rocks that make up the province include Precambrian granite and gneiss, while to the south there is also a thick layer of late Precambrian sedimentary rocks, consisting of poorly sorted siltstones, sandstones, and conglomerates (Hunt 1967). Elsewhere there are crystalline schists – metamorphic rocks created during the process of the mountain building. Much of the area is characterized by the presence of steep mountains cut by rivers and creeks with generally narrow valleys that are subject to flooding.

The geology of the region provides a wealth of raw materials useful to Native Americans. Quartz is common, either as low-quality weathered materials or higher-quality materials found in small outcrops. Chert is found to the west in the Ridge and Valley area of eastern Tennessee. This was recognized years ago as one of the favorite sources of raw materials for the Cherokee and other native groups in the area (see Keel 1976:5).

In the immediate project area there are

still private mineral rights on over 2,600 acres (Anonymous n.d.:16) and the Forest Service also notes that several permits have been issued in the past for surface stone removal.

The immediate area is characterized by a single broad soil association – Edneyville-Plott-Chestnut-Cullasaja. This association is characterized by rock outcrops and loamy soils formed in material weathered from high-grade metamorphic or igneous rocks or in colluvium (Thomas 1996).

Six specific soils are identified on the study tracts, including the Cleveland-Chestnut Rock Outcrop Complex, Cullasaja-Tuckasegee, the Edney-Chestnut Complex, Plott fine sandy loams, Rock Outcrop-Cleveland Complex, and Tuckasegee-Cullasaja Complex (Thomas 1996:Maps 71, 80, 81).

The Cleveland-Chestnut Rock Outcrop Complex has slopes ranging from 50 to 95% and consists of primarily shallow, somewhat excessively drained Cleveland soils along with Chestnut soils. In areas of surface soil there is generally up to 0.4 foot of black sandy loam (Thomas 1996:49).

The Cullasaja-Tuckasegee complex soils range in slope from 8 to 15%. Soils may have up to 0.9 foot of very dark grayish brown cobbly sandy clay loam overlying an additional foot of dark brown cobbly fine sandy loam (Thomas 1996:51-52).

The Edney-Chestnut soils found in the study area range in slope from 8 to 95% slope. Much of these soils have a surface layer of dark yellowish brown fine sandy loam up to 0.4 foot in depth, overlying a strong brown loam (Thomas 1995:68-69).

The Plott fine sandy loams have slopes of 15 to 30% and much of the soil is classified as stony. The soils are moderately steep, very deep, well drained soils on broad ridgetops. There may be a surface layer of 0.5 foot of very dark brown fine sandy loam over 0.7 foot of very dark grayish

brown fine sandy loam. The subsoil is a dark yellowish brown fine sandy loam (Thomas 1996:92-93).

The Rock Outcrop-Cleveland Complex is found on steep and very steep areas of rock outcrops and shallow, somewhat excessively drained Cleveland soils. These areas are, in general, similar to the Cleveland-Chestnut Rock Outcrop Complex (Thomas 1996:98-99).

The Tuckasegee-Cullasaja Complex includes slopes of 8 to 15% and is found in coves, drainageways, and on toe slopes. There may be up to 0.9 foot of black fine sandy loam to very dark grayish brown cobbly sandy clay loam over a dark brown fine sandy loam or dark brown cobbly fine sandy loam (Thomas 1996:125-126).

In spite of the exceptional slopes found in the region, Lee (1934) notes that there is little erosion in the more rugged areas of Macon County. While in the agricultural valley lands he noted that there was severe sheet erosion and even frequent gullies, in the upland areas there was only limited sheet erosion – likely because they are unsuitable for agriculture of even the most limited nature. Three decades ago Pittillo (1972:5) noted that there was little sediment in the Cullasaja River. The condition appears, however, to be deteriorating (Anonymous n.d.:10). In spite of this, the Data Summary for Unit 20 indicates that the soils in the study area are not classified as either severe or critical (Anonymous n.d.:4-5).

Nevertheless, Gade and Stillwell suggest that erosion continues to be a significant issue for the mountains, where the erosion rate is higher than the state average of 7.58 tons per acre per year. They note that this region is at particular risk because of the steep slopes, heavy rainfall, and concentrated fluvial action (Gade and Stillwell 1986:221). This tells only part of the story since all of these conditions have historically been present. The problem, it seems, is related to the decreased vegetative cover which has come to characterize farming, forestry, and development practices in the mid- to late twentieth century.

Climate

The North Carolina mountains are not only cooler than elsewhere in the state, giving the region a climate similar to coastal Washington and Oregon, but (until very recently) this resulted in increased precipitation because of their orographic influence. In other words, the warm, moist air masses moving in from the west (and from the south) will cool and condense water vapor as they rise over the mountains. The resulting cloud cover usually results in either dense rainfall, or snowfall. Once over the mountains, the air warms rapidly as it descends and causes drier conditions elsewhere in the state.

This effect can be seen locally, as well. For example, the average annual rainfall in the Franklin area, with an elevation of 2,600 feet AMSL, is about 52 inches. In Highlands, where the elevation is 4,100 feet AMSL, the rainfall is about 85 inches a year (Thomas 1996:3). Similar variations occur in temperature, snowfall, freeze dates, and of course, the length of the growing season.

In winter the average temperature is 39°F and in the summer the average is 85°F. The humidity averages about 60%, resulting in moderately comfortable conditions in the summer, but a feeling of cold damp in the winter.

Floristics

Watson voices the observation that most historians have noticed – frequently the one characteristic which drew the attention of visitors, traders, or explorers, is the region's vegetation. He comments that these early travelers all agreed on one subject – that trees were everywhere, "everywhere there were woods – dark, forbidding, and dense" (Watson 1983: 5). This was echoed in Bartram's comment as his guide, Mr. Galahan, left him in the midst of the Jore Mountains, "I was left again wandering along in the dreary mountains, not entirely pathless, nor in my present situation entirely agreeable" (Bartram 1980 [1792]:358).



Figure 5. Upland vegetation showing dense understory or scrub zone.

The natural vegetation of the project area is classified by Braun (1950) as the Southern Appalachians of the Oak-Chestnut Forest Region. Here, too, there is tremendous variation, depending on elevation. Braun notes that because of the diversity in topography and range in altitude, there "are great differences in forest vegetation" (Braun 1950:196). She observes that many classify the vegetation into three distinct categories: moist slope and cove, dry slope and ridge, and spruce forests. Barry (1980) recognizes this diversity and proposes a range of vegetative types, including riverbanks and alder zones, floodplain forests, mixed mesophytic forests - cove segregates, mixed mesophytic forests - slope segregates, ridgetops and upland oak forests, pine forests, and rock communities.

On the steep south-facing gaps, there is often a deciduous forest of beech, yellow birch, and sugar maple, known as "northern

hardwoods" and this frequently replaces the spruce-fir forest which is more sensitive to wind stress. Deciduous forests, however, are best developed in the lower elevations where conditions promote large, dense growth. Cove forests, in contrast, contain a variety of plants, including tulip poplar, yellow buckeye, hemlock, white pine, beech, birch, and maple. On the drier, south-facing slopes there are oaks, which have replaced the American chestnuts (these covered up to 80% of the area prior to the introduction of the blight in the 1920s).

It was out of this exceedingly rich and diverse flora that the Cherokee developed a wide



Figure 6. Steep topography in the project area.

variety of medicinal plants. Mooney (1891:324-327) identified at least 20 plants. Bass (1977) has suggested that it was the cove hardwood associations or mixed mesophytic forests - cove segregates that offered the most medicinal and edible wild plants to the Cherokee.

NATURAL ENVIRONMENT

Today the Forest Service identifies four primary management groups in the general area - a rather small amount of yellow pine; a much larger area of white pine; upland hardwoods with white, scarlet, and chestnut oak, hickory, some maple, beech, and yellow birch; and cove hardwoods with yellow poplar and northern red oak (Anonymous n.d.:7). Few of these, however, are particularly old stands; in fact the Forest Service estimates that less than 5% of the pine and 10% of the hardwood stands are 81 years or older. Many of the stands, however, are about 60 years old, placing them toward the end of CCC activities and probably reflecting the Civilian Conservation Corps effects at reforestation.

including humans, than a more homogenous environment (Brown 1999:3).

There are also areas of "special" vegetation. For example, the Kelsey Tract, Piney Knob Fork, and Walking Fern Cove are all areas identified as having special plant communities where timber cutting is prohibited (Anonymous n.d.:12). In the immediate area of Dry Falls Pittillo observed:

Apparently as the result of the ameliorating affect [sic] of the massive cliffs and continuous water flow, and the lack of direct, desiccating sunlight, some remarkable assemblages of plants have been noted (Pittillo 1972:5).

Brown also describes the varied historic - and prehistoric - environment of the project area, noting:

The western North Carolina mountains are remarkable for the presence of microenvironments - ecological communities that exist well south of their usual limits. These provide niches for a rich diversity of flora and fauna, the subject of international study and research. The combinations of microenvironments, soils, and lithology probably supported a higher biomass of fauna,

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Prehistoric Overview

Overviews for North Carolina's prehistory, while of differing lengths and complexity, are available in virtually every compliance report prepared. There are, in addition, some "classic" sources well worth attention, such as Joffre Coe's *Formative Cultures* (Coe 1964), as well as some new general overviews (such as Mathis and Crow 1983 and more recently Ward and Davis 1999). There are also a number of theses and dissertations prepared exploring the Cherokee region. Only a few of the many sources are included in this study, but they should be adequate to give the reader a "feel" for the area and help establish a context for the various sites identified in the study areas. For those desiring a more general synthesis, perhaps the most readable and well balanced is that offered by Judith Bense (1994), *Archaeology of the Southeastern United States: Paleoindian to World War I*. Figure 7 offers a generalized view of North Carolina's cultural periods.

Paleoindian Period

The Paleoindian Period, most commonly dated from about 12,000 to 10,000 B.P., is evidenced by basally thinned, side-notched projectile points; fluted, lanceolate projectile points; side scrapers; end scrapers; and drills (Coe 1964; Williams 1965). Oliver (1981, 1985) has proposed to extend the Paleoindian dating in the North Carolina Piedmont to perhaps as early as 14,000 B.P., incorporating the Hardaway Side-Notched and Palmer Corner-Notched types, usually accepted as Early Archaic, as representatives of the terminal phase. This view, verbally suggested by Coe for a number of years, has considerable technological appeal.¹ Oliver

¹ While never discussed by Coe at length, he

suggests a continuity from the Hardaway Blade through the Hardaway-Dalton to the Hardaway Side-Notched, eventually to the Palmer Side-Notched (Oliver 1985:199-200). While convincingly argued, this approach is not universally accepted (see Ward and Davis 1999:42-45).

The Paleoindian occupation, while widespread, does not appear to have been intensive. Artifacts are most frequently found along major river drainages, which Michie interprets to support the concept of an economy "oriented toward the exploitation of now extinct mega-fauna" (Michie 1977:124). Survey data for Paleoindian tools, most notably fluted points, is rather dated for North Carolina (Brennan 1982; Peck 1988; Perkinson 1971, 1973; cf. Anderson 1990). In spite of this, the distribution offered by Anderson (1992b:Figure 5.1) reveals a rather general, and widespread, occurrence throughout the region. Unfortunately, the evidence for Paleoindians appears sparse in the mountains and no well preserved sites have been identified (Ward and Davis 1999:46).

Distinctive projectile points include lanceolates such as Clovis, Dalton, perhaps the Hardaway (Coe 1964; Phelps 1983; Oliver 1985). A temporal sequence of Paleoindian projectile points was proposed by Williams (1965:24-51), but according to Phelps (1983:18) there is little

did observe that many of the Hardaway points, especially from the lowest contexts, had facial fluting or thinning which, "in cases where the side-notches or basal portions were missing, . . . could be mistaken for fluted points of the Paleo-Indian period" (Coe 1964:64). While not an especially strong statement, it does reveal the formation of the concept. Further insight is offered by Ward's (1983:63) all too brief comments on the more recent investigations at the Hardaway site (see also Daniel 1992).

CULLASAJA GORGE PROJECT, HIGHLANDS RANGER DISTRICT, NANTAHALA NATIONAL FOREST

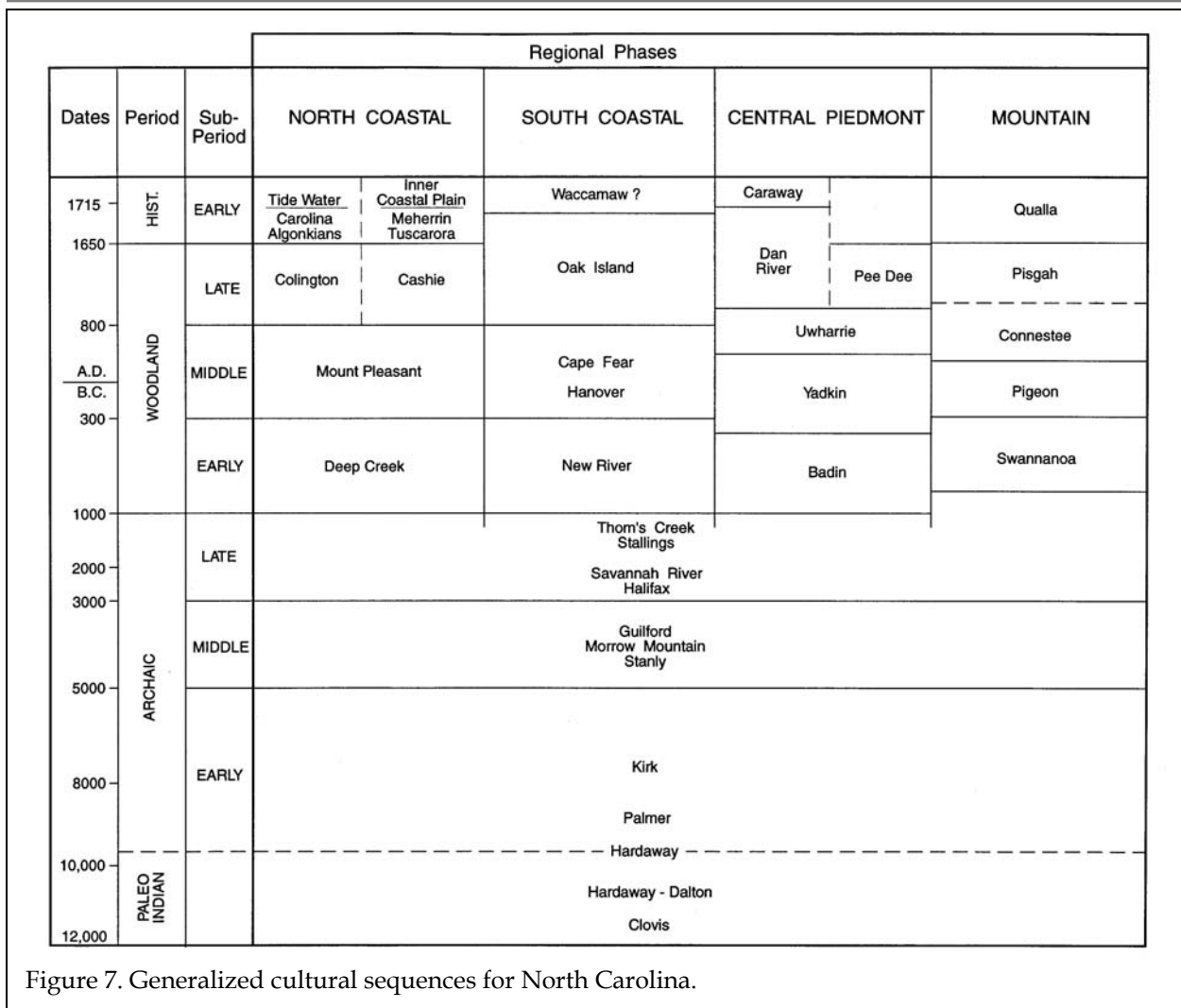


Figure 7. Generalized cultural sequences for North Carolina.

stratigraphic or chronometric evidence for it. While this is certainly true, a number of authors, such as Anderson (1992a) and Oliver (1985) have assembled impressive data sets. We are inclined to believe that while often not conclusively proven by stratigraphic excavations (and such proof may be an unreasonable expectation), there is a large body of circumstantial evidence. The weight of this evidence tends to provide considerable support.

Unfortunately, relatively little is known about Paleoindian subsistence strategies, settlement systems, or social organization (see, however, Anderson 1992b for an excellent overview and synthesis of what is known).

Generally, archaeologists agree that the Paleoindian groups were at a band level of society (see Service 1966), were nomadic, and were both hunters and foragers. While population density, based on isolated finds, is thought to have been low, Walthall suggests that toward the end of the period, "there was an increase in population density and in territoriality and that a number of new resource areas were beginning to be exploited" (Walthall 1980:30).

Archaic Period

The Archaic Period, which dates from

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10,000 to 3,000 B.P.², does not form a sharp break with the Paleoindian Period, but is a slow transition characterized by a modern climate and an increase in the diversity of material culture. Associated with this is a reliance on a broad spectrum of small mammals, although the white tailed deer was likely the most commonly exploited animal. Archaic period assemblages, exemplified by corner-notched and broad-stemmed projectile points, are fairly common, perhaps because the swamps and drainages offered especially attractive ecotones.

Many researchers have reported data suggestive of a noticeable population increase from the Paleoindian into the Early Archaic. This has tentatively been associated with a greater emphasis on foraging. Diagnostic Early Archaic artifacts include the Kirk Corner Notched point. As the climate became hotter and drier than the previous Paleoindian period, resulting in vegetational changes, it also affected settlement patterning as evidenced by a long-term Kirk phase

midden deposit at the Hardaway site (Coe 1964:60). This is believed to have been the result of a change in subsistence strategies.

Settlements during the Early Archaic suggest the presence of a few very large, and apparently intensively occupied, sites which can best be considered base camps. Hardaway might be one such site. In addition, there were numerous small sites which produce only a few artifacts – these are the "network of tracks" mentioned by Ward (1983:65). The base camps produce a wide range of artifact types and raw materials which has suggested to many researchers long-term, perhaps seasonal or multi-seasonal, occupation. In contrast, the smaller sites are thought of as special purpose or foraging sites (see Ward 1983:67).

Middle Archaic (8,000 to 6,000 B.P.) diagnostic artifacts include Morrow Mountain, Guilford, Stanly, and Halifax projectile points. Much of our best information on the Middle Archaic comes from sites investigated west of the Appalachian Mountains, such as the work by Jeff Chapman and his students in the Little Tennessee River Valley (for a general overview see Chapman 1977, 1985a, 1985b). There is good evidence that Middle Archaic lithic technologies changed dramatically. End scrapers, at times associated with Paleoindian traditions, are discontinued, raw materials tend to reflect the greater use of locally available materials, and mortars as well as atl-atls are initially introduced. Associated with these technological changes there seem to also be some significant cultural modifications. Prepared burials begin to more commonly occur and storage pits are identified. The work at Middle Archaic river valley sites, with their evidence of a diverse floral and faunal subsistence base, seems to stand in stark contrast to Caldwell's Middle Archaic "Old Quartz Industry" of Georgia and the Carolinas, where axes, choppers, and ground and polished stone tools are very rare.

The available information has resulted in a variety of competing settlement models. Some argue for increased sedentism and a reduction of mobility (see Goodyear et al. 1979:111). Ward

² The terminal point for the Archaic is no clearer than that for the Paleoindian and many researchers suggest a terminal date of 4,000 B.P. rather than 3,000 B.P. There is also the question of whether ceramics, such as the fiber-tempered Stallings ware, will be included as Archaic, or will be included with the Woodland. Oliver, for example, argues that the inclusion of ceramics with Late Archaic attributes "complicates and confuses classification and interpretation needlessly" (Oliver 1981:20). He comments that according to the original definition of the Archaic, it "represents a preceramic horizon" and that "the presence of ceramics provides a convenient marker for separation of the Archaic and Woodland periods (Oliver 1981:21). Others would counter that such an approach ignores cultural continuity and forces an artificial, and perhaps unrealistic, separation. Sassaman and Anderson (1994:38-44), for example, include Stallings and Thom's Creek wares in their discussion of "Late Archaic Pottery." While this issue has been of considerable importance along the Carolina and Georgia coasts, it has never affected the Piedmont, which seems to have embraced pottery far later, well into the conventional Woodland period. The importance of the issue in the Sandhills, unfortunately, is not well known.

argues that the most appropriate model is one which includes relatively stable and sedentary hunters and gatherers "primarily adapted to the varied and rich resource base offered by the major alluvial valleys" (Ward 1983:69). While he recognizes the presence of "inter-riverine" sites, he discounts explanations which focus on seasonal rounds, suggesting "alternative explanations . . . [including] a wide range of adaptive responses." Most importantly, he notes that:

the seasonal transhumance model and the sedentary model are opposite ends of a continuum, and in all likelihood variations on these two themes probably existed in different regions at different times throughout the Archaic period (Ward 1983:69).

Others suggest increased mobility during the Archaic (see Cable 1982). Sassaman (1983) has suggested that the Morrow Mountain phase people had a great deal of residential mobility, based on the variety of environmental zones they are found in and the lack of site diversity. The high level of mobility, coupled with the rapid replacement of these points, may help explain the seemingly large numbers of sites with Middle Archaic assemblages.

Recently Abbott et al. argue for a combination of these models, noting that the almost certain increase in population levels probably resulted in a contraction of local territories. With small territories there would have been significantly greater pressure to successfully exploit the limited resources by more frequent movement of camps. They discount the idea that these territories could have been exploited from a single base camp without horticultural technology. Abbott and his colleagues conclude, "increased residential mobility under such conditions may in fact represent a common stage in the development of sedentism" (Abbott et al. 1995:9).

The Late Archaic, usually dated from

6,000 to 3,000 or 4,000 B.P., is characterized by the appearance of large, square stemmed Savannah River projectile points (Coe 1964). These people continued to intensively exploit the uplands much like earlier Archaic groups, with the bulk of our data for this period coming from the Uwharrie region in North Carolina.

One of the more debated issues of the Late Archaic is the typology of the Savannah River Stemmed and its various diminutive forms. Oliver, refining Coe's (1964) original Savannah River Stemmed type and a small variant from Gaston (South 1959:153-157), developed a complete sequence of stemmed points that decrease uniformly in size through time (Oliver 1981, 1985). Specifically, he sees the progression from Savannah River Stemmed to Small Savannah River Stemmed to Gypsy Stemmed to Swannanoa from about 5000 B.P. to about 1,500 B.P. He also notes that the latter two forms are associated with Woodland pottery.

This reconstruction is still debated with a number of archaeologists expressing concern with what they see as typological overlap and ambiguity. They point to a dearth of radiocarbon dates and good excavation contexts at the same time they express concern with the application of this typology outside the North Carolina Piedmont (see, for a synopsis, Sassaman and Anderson 1990:158-162, 1994:35).

In addition to the presence of Savannah River points, the Late Archaic also witnessed the introduction of steatite vessels (see Coe 1964:112-113; Sassaman 1993), polished and pecked stone artifacts, and grinding stones. Some also include the introduction of fiber-tempered pottery about 4000 B.P. in the Late Archaic (for a discussion see Sassaman and Anderson 1994:38-44). This innovation is of special importance along the Georgia and South Carolina coasts, but seems to have had only minimal impact in the uplands of South or North Carolina.

There is evidence that during the Late Archaic the climate began to approximate modern climatic conditions. Rainfall increased resulting in

a more lush vegetation pattern. The pollen record indicates an increase in pine which reduced the oak-hickory nut masts which previously were so widespread. This change probably affected settlement patterning since nut masts were now more isolated and concentrated. From research in the Savannah River valley near Aiken, South Carolina, Sassaman has found considerable diversity in Late Archaic site types with sites occurring in virtually every upland environmental zone. He suggests that this more complex settlement pattern evolved from an increasingly complex socio-economic system. While it is unlikely that this model can be simply transferred to the Sandhills of South Carolina without an extensive review of site data and micro-environmental data, it does demonstrate one approach to understanding the transition from Archaic to Woodland.

Woodland Period

The Woodland period begins, by definition, with the introduction of fired clay pottery. While this may have occurred as early as about 2000 B.C. along the Carolina coast, it likely didn't happen until about 700 or 1000 B.C. in the North Carolina mountains. In some areas of the Carolina piedmont, pottery may not have made an introduction until 500 B.C. Regardless, the period from 2000 to 500 B.C. was a period of tremendous change. As Ward and Davis note, this period in the Mountains "was a time of increasing cultural diversity stimulated by ideas from outside the region" (Ward and Davis 1999:139).

The subsistence economy during this period was based primarily on deer hunting and fishing, with supplemental inclusions of small mammals, birds, reptiles, and shellfish. Various calculations of the probable yield of deer, fish, and other food sources identified from some coastal sites indicate that sedentary life was not only possible, but probable. Further inland it seems likely that many Native American groups continued the previous established patterns of band mobility. These frequent moves would allow the groups to take advantage of various seasonal

resources, such as shad and sturgeon in the spring, nut masts in the fall, and turkeys during the winter. It was probably fairly late in the Woodland before horticulture, much less agriculture, became a significant means of subsistence.

Early Woodland

Artifacts typical of the Early Woodland in the Piedmont and Appalachian region consist of Dunlap (Wauchope 1966:46-47) and Swannanoa (Keel 1976:260-266) ceramics (similar to the Kellogg focus of Northern Georgia). The Dunlap series is characterized by a medium to coarse sand paste, fabric impressions, and vessels with a simple jar or cup form. The Swannanoa ceramics, with heavy crushed quartz temper, are cord marked or fabric impressed conoidal jars and simple bowls. Other surface treatments consist of simple stamping, check stamping, and smoothed plain (Keel 1976:230). Early Woodland projectile point types consist of Savannah River Stemmed (and its variants), Swannanoa Stemmed (Keel 1976:196-198), Plott Stemmed (Keel 1976:126-127), and the Transylvania Triangular (Holden 1966:54-56; Keel 1976:130).

There is ample evidence from both North and South Carolina that there was increased mobility and the exploitation of a greater variety of environmental zones, including much greater use of the inter-riverine zone. Ward and Davis (1999:143-145) also observe that there may be both upland seasonal camps, as well as larger, and more permanent, alluvial floodplain sites. Although no clear evidence of cultigens or "encouraged" plants have been found at North Carolina Swannanoa sites, Ward and Davis (1999:146) suspect that they will be encountered, most likely on buried floodplain sites. The presence of large rock filled hearths and straight-sided or bell-shaped storage pits may suggest greater complexity than has been thus far determined. The Early Woodland in the study area is thought to extend from about 750 B.C. or perhaps earlier through about 350 B.C.

Middle Woodland

Pottery typical of the Middle Woodland in the area consists of the Pigeon (Keel 1976:256-260) with its strong Cartersville and Deptford associations, as well as the Connestee (Keel 1976:247-255) with its Napier (Wauchope 1966:57-60) connection.

Pigeon is quartz tempered with surface treatments of check stamping, simple stamping, and brushing. This phase is expected to range from about 350 B.C. to about A.D. 300. The Cartersville type is characterized by sand or grit paste with the primary surface treatment being cord marking, although there are also check stamped and simple stamped varieties. The Cartersville series is thought to be closely related to the Deptford series on the Coast. Anderson and Schuldenrein (1985:720) suggest that Cartersville continues well into the Late Woodland period. The Pigeon Side Notched projectile point type is typically found in association with these wares (Keel 1976:127-129). Also found, and spanning the following Connestee Phase, is the Garden Creek Triangular point (Keel 1976:130-131). The Copena Triangular is a rather vaguely defined point that tends to occur in a broad range of Early to Middle Woodland contexts throughout the Southeast. They are distinguished by recurvate, lanceolate blades, and straight or excurvate bases.

Some suggest that the Middle Woodland period reflects a new pattern of settlement, with a move to the floodplain that is suggested to signal a shift to horticulture (Purrington 1983:136). To date this has not also been accompanied by very convincing ethnobotanical evidence.

Keel (1976:229) and others suggest a strong external influence on the Pigeon culture, with the ceramics suggesting a continuum with the materials found in the Georgia Piedmont or perhaps the east Tennessee area. As Purrington (1983:137) observes, this is not, however, in agreement with Dickens' (1980) analysis of ceramic diversity during the Woodland Period. Nevertheless, there is much about the Middle Woodland for which we have little evidence and

the period remains among the least well understood in the mountains.

Napier (Wauchope 1966:57-60) and Connestee (Keel 1976:247-255) Series pottery are typical of the second half of the Middle Woodland for the Mountain area and likely date from about A.D. 300 to 800 or 1000 (cf. Keel 1976:221). The Napier series is a fine sand tempered ware with fine complicated stamped designs. The Connestee series is a thin walled sand tempered ware with brushed or simple stamped surface decorations. There are also cord marked, check stamped, fabric impressed, and plain varieties. Projectile points characteristic of this phase include the Haywood Triangular (Keel 1976:132-133), probably from the late Connestee and perhaps early Pisgah, as well as the Connestee Triangular (Keel 1976:131-132).

External influences are pretty clear during the Connestee Phase and include a range of prismatic blades that Keel (1976:136) notes as being virtually indistinguishable, in metric terms, from those found at Ohio Hopewell sites. Not only was there contact with the Hopewell, but there seems to also have been considerable internal development. For example, Keel (1976:225-226) suggests that the hazy period of transition between Connestee and Pisgah may hold evidence of increasing dependence on cultigens.

Keel (1976) reported on the Garden Creek Mound No. 3 which contained a dominant Connestee component based on George Heye's 1915 examination of the mound. Later work at Garden Creek Mound No. 2 examined a portion of a village with a large quantity of Connestee remains. A number of postholes were exposed revealing one discernable square house with rounded corners measuring about 19 by 19 feet in outline. In addition, there were a number of refuse pits and hearths. The hearths included both rock filled and surface hearths. There were also a number of burial pits (see Keel 1976:99; Figure 15). It is likely that Connestee sites in the region will contain similar features.

There are today several other studied Connestee sites in the region which are worthy of

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mention. A large Connestee site was encountered at the Horshaw Bottoms site (31CE41) by Ken Robinson (1989). Excavations for pipeline construction revealed a midden with preserved ethnobotanical remains, including a variety of nuts and seeds, as well as two cupules of corn. Features were well preserved, although no human remains were encountered. While postholes were common – indicating that structures were almost certainly present – the confined scope of the excavations did not allow patterns to be observed.

Wetmore (1990) has provided a valuable overview of both a Connestee and Qualla phase settlement at the Ela site (31SW5). About 1.6 acre of the site was mechanically stripped, with the identification of about 210 features (25 features are discounted since they represent tree disturbances, backhoe disturbances, and similar non-cultural intrusions). This represents about 131 features per acre – a figure very similar to 31MA77, where 1.2 acres were stripped, revealing 168 features, yielding a density of 140 features per acre. It seems likely that the two sites are very similar.

Ten probable Connestee structures were identified from the work by Wetmore. All were circular, measuring from 21.4 to 27.6 feet in diameter, with a mean of 24.7 feet and a standard deviation of 2.4 feet. The number of posts comprising these structures varied considerably, from a low of 25 to as many as 150. Reference to the drawings suggests that the structures were very difficult to identify. The posited houses lacked internal hearths, although large rock filled features were found nearby, suggesting that cooking may have taken place outside. This study also revealed 10 burials, although all for which a cultural affiliation could be ascribed were apparently Qualla. The Connestee pottery from the site was dominated by plain surface finishes (86.0%), followed by smoothed (6.2%), brushed (3.0%), and cord marked (2.7%). Minor quantities of simple stamped, check stamped, and “other” were also reported (Wetmore 1990:163).

Most recently Wetmore et al. (1996) report a somewhat similar Connestee component from

the Macon County Industrial Park site (31MA185). Completion of that study should provide very significant additional information concerning Connestee phase occupation in the Macon County area.

Ward and Davis (1999:154) suggest that Connestee sites are larger and “reflect greater occupational intensity” than earlier Pigeon sites in the region. They are found in floodplain settings and often cover several acres. Where investigated they seem to possess numerous features, including structures. While they don’t believe that corn agriculture was present (discounting the corn from Horshaw Bottoms), they are inclined to believe that the settlements focused on “the cultivation of indigenous small-grain seed plants,” as well as hunting, gathering, and fishing.

The available research on Connestee sites suggests a variety of significant research topics. Ward and Davis (1999:155) point out that not only is the terminus of the phase poorly understood, but the phase itself needs to be broken into finer chronological units. This will require the excavation of a number of Connestee sites, far more radiocarbon dates, and additional fine-scale analysis of ceramic assemblages. They also suggest that it would be productive to pay more attention to the extra-local pottery types, such as Napier and Swift Creek, in the hope that these assemblages would denote “recognizable temporal boundaries.” They go on to suggest that:

the artifacts and ideas derived from the Hopewell area may be more typical of the first half of the Connestee phase and that the Swift Creek-Napier ceramic styles, with their southerly origins, may be more typical of the last half of the Connestee phase (Ward and Davis 1999:156).

Late Woodland

Ward and Davis (1999:157) note that the Late Woodland is poorly understood, or

documented, in the Mountains. They suggest that the Connestee phase may extend into the Late Woodland and draw connections between this assemblage and the pottery recovered during salvage excavations at the Cane Creek site (31MI3) in Mitchell County, about 100 miles northeast of Franklin.

Mississippian Period

The South Appalachian Mississippian period, from about A.D. 1100 to A.D. 1640 is the most elaborate level of culture attained by the native inhabitants and is followed by cultural disintegration brought about largely by European disease.³ The period is characterized by complicated stamped pottery, complex social organization, agriculture, and the construction of temple mounds and ceremonial centers.

In the Appalachian region, Mississippian pottery includes the Pisgah and Qualla series. Pisgah ceramics (A.D. 1000 - 1450) are tempered with unmodified river sand, although some earlier examples contain both river sand and crushed quartz. It is decorated with complicated stamping (characteristically rectangular stamped), check stamping and ladder-like rectilinear patterns (Dickens 1970; Holden 1966). Other artifacts associated with the Mississippian period include triangular projectile points, flake scrapers, microtools, graters, perforators, drills, ground stone objects (celts, pipes, and discoidals), and worked shell and mica (Keel 1976).

The largest amount of regional work has taken place in the North Carolina mountains at sites such as Tuckasegee, Garden Creek, and Warren Wilson. At Tuckasegee a possible town house was uncovered measuring about 23 feet in diameter with a central hearth (Keel 1976). At Warren Wilson several roughly square structures

were uncovered and they all measured on the average about 21 feet square. Burials were common inside of these houses and pit features were abundant. Artifacts at the Warren Wilson site included ceramics from the Swannanoa series up through the Pisgah series (Dickens 1970; see also Ward and Davis 1999:161-165). More recently Moore (1981) has examined the Pisgah assemblage of the Brunk Site (31BN151). This site is of special interest since it is found in an anomalous setting at the head of a mountain cove, rather than in the more typical Pisgah floodplain setting.

Burials at Pisgah sites tend to be flexed, to be wrapped in a fetal position pointing westward, and are found in one of three types of grave shafts: simple, straight-sided pits, shaft and side-chamber pits, and shafts with central chamber pits (Figure 5). Burial goods were most commonly shell (beads, gorgets, ear pins), animal bone (rattles and beads), or mica (cut plates or disks).

Homes Hogue Wilson (1986) examined burials from the Warren Wilson site in western North Carolina and provided some preliminary conclusions regarding social structure based on location of burials according to age and sex. For instance, she found more males than females were buried under structure floors. These males included primarily those under 25 or over 35 years old. She also found that individuals buried inside of structures were more likely to have burial goods than those buried in public areas. Burial feature types included pit burials, side-chambered burials, and central-chambered burials. Studies such as this can give great insight into the social organization of prehistoric societies.

It is during the Pisgah Phase that evidence of agriculture is clearly documented and the settlement system seems to include both large villages – sometimes with mounds – and smaller hamlets or farmsteads located along the valley margins. Dickens uses this to suggest that the Pisgah people were still dependent on hunting and gathering.

While the traditional view has been that of a Pisgah to Qualla evolution, some authors are

³ Small pox was a major cause of death to a large number of Native Americans during the historic period. The smallpox epidemics of 1734 and 1783 reportedly killed half of the Cherokee population (Hatley 1993).

suggesting that this is untenable and an “artifact” of the sites chosen for early research (see, for example, Moore 1986 and more recently Ward and Davis 1999:178-179). Ward and Davis (1999:180-181) argue that the Pisgah phase had little impact and is a rare component at sites west of the Tuckasegee drainage – such as the area of 31MA77. Moreover, they suggest that, “an as-yet-unrecognized early Qualla (or Lamar) phase culture was thriving in the western mountains at about the same time Pisgah influence was being felt in the central portion of the Appalachian Summit” (Ward and Davis 1999:180). This view emphasizes their belief that the Qualla phase is best understood in the context of the Lamar culture of northern Georgia and eastern Tennessee.

Given this belief that an “Early Qualla” will eventually be identified, Ward and Davis suggest that Middle Qualla, which they date to A.D. 1450 through 1700, is characterized by jars with flaring rim forms which are decorated with a notched applique strip beneath the lip. The surface treatment included complicated stamping using both rectilinear and curvilinear designs, with the latter becoming more common through time. Often the designs were blurred through smoothing. Other types described by Egloff (1967) include burnished, plain, check stamped, cord marked, and corncob impressed. At Tuckasegee brushed examples were also identified (Keel 1976).

Although it has been often suggested that the quality of the stamps declined into Late Qualla, Ward and Davis (1999:181) suggest that this trend is not always clear. Perhaps more significantly, cazuela bowl forms were introduced along with incised designs (which they suggest are similar to the motifs found in the Middle Lamar Tugaloo phase of northern Georgia). The check stamped and cord marked stamps also seem to increase in popularity during the Late Qualla.

Much discussion of Qualla lifeways focuses on the research at the Coweeta Creek site (on the west side of the Little Tennessee River near its junction with Coweeta Creek in Macon

County). There houses similar in size and shape to those at Pisgah sites (i.e., square with rounded corners about 20 feet on a side) were found. They possessed vestibule entrances and had interior supports. In the center of the structures were clay hearths. Excavations revealed not only residential architecture, but also a mound and a series of six superimposed town houses. All but the most recent town house were square, about 36 feet on a side, with rounded corners and a vestibule entrance. The most recent town house was roughly circular.

Ward and Davis suggest that villages were larger and more nucleated in the Middle Qualla phase, but became more dispersed later in time. They, however, observe that the continued use of the Coweeta Creek mound and town house, even though there was no longer a surrounding village, “indicates a strong sense of community even though people may have lived some distance apart” (Ward and Davis 1999:187). Alternatively, it may indicate the exceptionally strong cultural or religious attachment to the townhouse itself.

Burials at Qualla sites are found in pits similar to those identified at Pisgah sites. The 83 burials from Coweeta Creek (which included 87 individuals) were in either simple, straight-sided, oval to rectangular pits or in pits with cylindrical shafts and side chambers. Orientation was typically to the southeast. Grave goods, when present, included shell beads, gorgets, pins; stone and clay pipes; pottery vessels; rattles; and ocher. Graves were typically in the village area, often associated with houses and many times at or below hearths. Ward and Davis also note that there were burials within and surrounding the town house – suggesting that these individuals were especially important members of the community (Ward and Davis 1999:189). Given the available information, they suggest that the cycles of town house destruction and rebuilding were associated with the death and burial of significant leaders. They also suggest that while males were dominant in town leadership, females filled the roles of clan leaders.

Cultivation continued to be the most important subsistence activity, although wild plants were collected and a broad range of animals were hunted (although deer provided the bulk of the meat).

The previously mentioned Ela site (31SW5) excavations by Wetmore (1990) also revealed a large quantity of Qualla phase material. At least seven of the 10 burials were thought to be Qualla. The most common burial pit (n=3) was a shaft and chamber style, with the pit being oval (averaging about 2.8 by 2.2 feet). Two graves were described as “stepped pits,” or probably pits with central chambers. The grave shafts were again oval, with the two examples measuring 2.6 by 2.4 and 3.8 by 3.4 feet. The single example of a simple pit was also oval, measuring 4.1 by 2.4 feet. Of the five posited Qualla houses all were rectangular. The three which were complete had measurements averaging 25.4 by 28.7 feet.

The most common Qualla pottery at the Ela site was plain (45.1% of the collection), followed by smoothed (34.8%). Complicated stamped surface treatment is reported on only 6% of the pottery, followed by cord marking on 4.5% of the sherds. Simple stamping, brushed, and “other” are minor finishes. Other artifacts worthy of mention include hematite which exhibited grooved surfaces (Wetmore 1990:158) and quartz crystals (which Mooney [1900:298] noted as having special powers and being used by conjurers).

More recently Scott Shumate and Larry Kimball (1997) examined a small, ca. A.D. 1650 Qualla settlement (31SW273) in the Nantahala National Forest. At this site they found two structures which were likely related. One appears to be a roughly circular winter house measuring about 22.5 feet in diameter. The structure had a central hearth, as well as three shallow basin-shaped interior pit features. Just outside the structure, they suggest that an elliptical rock filled pit functioned as an exterior hearth or earth oven. Also present was a rectangular summer house measuring about 32.5 by 14.6 feet. The interior of this structure contained a number of postholes

which they interpret to be interior partitions. Also present are several shallow hearths. Nearby were several large pits which they interpret to be storage pits.

Also in 1997 Brett Riggs and his colleagues reported on a ca. A.D. 1405 settlement in Jackson County (31JK291) with sherds which “resemble both Pisgah phase or Qualla phase materials, but do not conform neatly to either of these previously defined late Mississippian configurations” (Riggs et al. 1997:vi). The ceramics may reflect a transition from Pisgah to Qualla, or they may reflect a Lamar antecedent. The relatively early date may also suggest that the wares are representative of the “Early Qualla” sought by Ward and Davis (1999).

A single structure from the excavations is suggestive of a squared house with rounded corners and a vestibule entrance (Riggs et al. 1997:68). The site also documented a corn economy, supplemented by a diverse range of wild foods.

Research questions proposed for the Qualla include, of course, an effort to determine the existence and nature of any “Early Qualla” phase, as well as the overall relations between the Pisgah, Qualla, and Lamar ceramics. In addition, Wetmore and her colleagues note that “information about 18th century Middle Cherokee villages and homestead organization” is critical (Wetmore et al. 1996:17). The same can be said for earlier Qualla assemblages since the changes which occur between Early, Middle, and Late phases – when recognized at all – are based exclusively on the pottery.

A Euro-American Historic Synthesis

Western North Carolina began to be opened to Anglo-American settlement in years shortly after the American Revolution. For example, the area of Buncombe and Haywood counties were opened to settlement by the Treaty of Hopewell in 1785, although it wasn't until the Treaty of Tellico that at least some of the area of modern-day Macon County was officially opened

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for white settlement. The Meigs-Freeman Line, surveyed in 1802, placed the Cherokee-Anglo border along the northeastern shore of the Tuckasegee River, about 15 miles east of Highlands, in eastern Macon County. Virtually all of Macon County came under Anglo control as a result of the 1819 treaty.

Macon County wasn't created until 1828, when it was broken off from Haywood County. By 1839 Cherokee County was further created from the old Macon County, although that left Macon still holding land which would eventually become Jackson and Swain counties (Corbitt 1950).

By 1850 the population of Macon County (which stretched as an irregular rectangle from the Tennessee border southward to the Georgia border) had grown to 6,389 from only 4,869 in 1840. Of these, 5,734 were whites and only 655 African American slaves were recorded for the County (DeBow 1854). There were 631 farms in the county, holding on average 225 acres of land, with an average value of \$636. In contrast, Cherokee County, roughly the same size and stretching from Macon's border westward to the Tennessee and Georgia lines, reported 459 farms, each with only 211 acres, but an average value of \$884. To the east lay Haywood County, slightly smaller but still spanning the area from Tennessee to Georgia. This County contained 653 farms, averaging 600 acres in size and boasting an average value of \$749. To the northeast lay Buncombe County, with 1,105 farms, each with an average of 526 acres and an average value of \$1,202.

As might be imagined, Buncombe County was, in the immediate region, the leader in the production of rye (143,095 bushels compared to only 74,826 in Macon County), wheat (27,548 bushels compared to 3,687), and corn (487,014 bushels compared to 225,397). Buncombe also produced more Irish potatoes (29,342 bushels compared to 23,014) and hay (3,244 tons compared to only 721 tons). Yet surprisingly, Macon County did produce over a third more rye than neighboring Cherokee and Haywood counties

(each of which produced under 47,000 bushels). And Macon County produced more corn and wheat than Cherokee County, and more potatoes than Haywood County. But the single biggest difference was in the area of tobacco. Macon County's yield was 34,710 pounds, compared to 18,999 pounds in Buncombe, 14,324 pounds in Haywood, and 7,934 pounds in Cherokee. Macon, and the counties formed from its land, were to become an area where the Burley tobacco would be grown into the twentieth century. This tobacco, cured by air and heavier-bodied than Bright, would become a major commodity in the 1860s (Brooks 1962).

Consequently, while the Macon County's farms were smaller and had lower values, they weren't necessarily producing less than those in neighboring counties. In fact, the tobacco crop suggests that the Macon farmers were finding a special niche and exploiting it successfully, while still managing to focus on food crop production.

Because of the isolation, there tended to be economic stagnation in much of the rural mountain area of North Carolina. Industrial development was slow and few towns were formed. Even finding gold about 1860 had minimal impact on the area (Anonymous n.d.:2).

The Civil War also had relatively little impact on the area, and many of the region's farmers were openly sympathetic to the Union cause. The area also became a safe haven for Union deserters. Powell (1989:364) notes that Macon County was known for its Union deserters and their frequent raids on surrounding farms. Perhaps even more debilitating, however, were the taxes imposed by the Confederate government, amounting to a 10% levy on all farm products.

After the Civil War there was return to an emphasis on agricultural production focused on self-sufficiency. This region (with the exception of Buncombe County), unlike many areas of the South, had never relied on African American slavery and there was not the extent of either

economic or social shock after the war. Nevertheless, Macon remained isolated, particularly from much of North Carolina.

The hope of the region were the railroads that would bring the region's vast untapped natural wealth into reach. Railroad development, it was thought, would promote tourism and industrial growth. The transportation network, and particularly the Talullah Falls Railway, encouraged connections with northern Georgia over contact with western North Carolina. And the railroads did dramatically change this part of North Carolina. Almost overnight Asheville became a boom town. Even those who continued to farm small holdings found their world changed - they had better access to markets and manufactured goods became more common and less expensive.

Industry included mining, manufacturing, hydroelectric power production, and large-scale logging - all of which had dramatic affects on the region's landscape. In particular industrial logging was particularly damaging. It forever changed the way of life, eroding both the traditions and also the soil (Bishir et al. 1999:33). By the 1890s northern timber companies bought up huge tracts and began a process of clear-cutting thousands of acres. Bishir and her colleagues report that during the first several decades of the twentieth century western North Carolina was yielding as much as 4 billion board feet of timber per year - almost 40% of the national production. The first commercial timbering in the project vicinity, at Walnut Creek, was conducted in 1908, with activities at Crows Creek and Goldmine Creek by 1918. The first major commercial lumbering operation in the area was conducted in 1919 (Anonymous n.d.:2).

Their work was so effective that by 1920 western North Carolina's timber resources - once thought limitless - were nearly depleted. Timber output dropped to 2.4 billion board feet in 1919 and to 2 billion board feet by 1929. By the coming of the Great Depression the northern timber companies had already plundered the western North Carolina forests and left the landscape denuded and eroding and the population

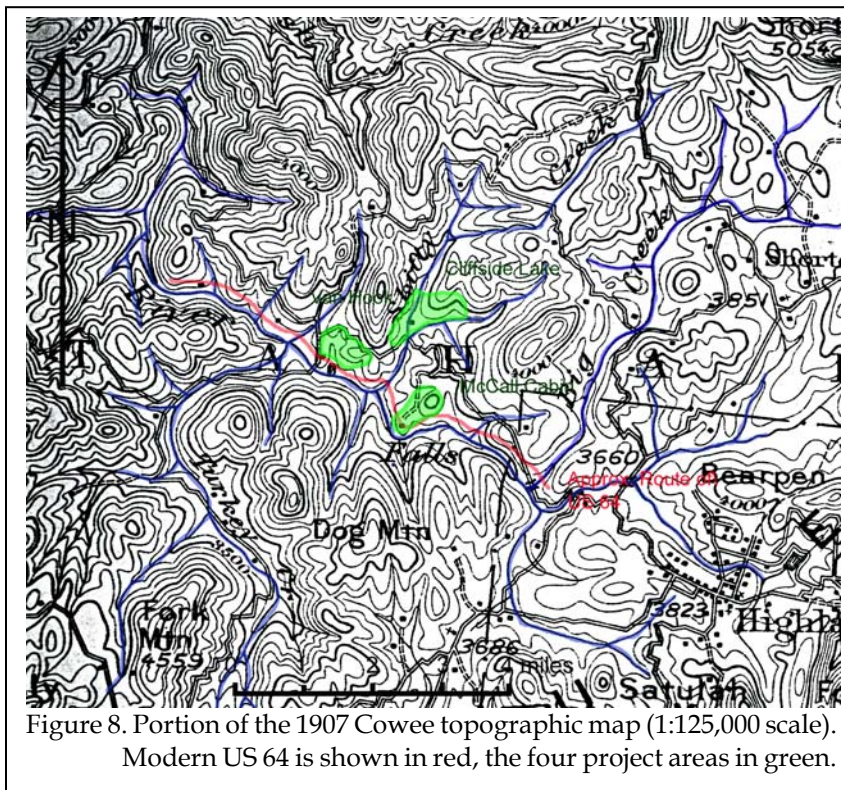
impoverished and unemployed.

It was this terrible episode of forestry exploitation that catalyzed the development of scientific forestry (Bishir et al. 1999:47). Although a division of forestry had been created within the Department of Agriculture by 1881, and President Harrison had created 17 forest reserves from land that was public domain in 1891, it wasn't until 1905 that the administration of the Nation's forest reserves was placed under the Department of Agriculture. In 1907 that the Bureau of Forestry became the Forest Service and these reserves were designated national forests. By 1911 the Weeks Law authorized the Forest Service to seek land for purchase in the East where there were essentially no public domain lands and by 1924 the Clarke-McNary Act allowed forestry programs to expand (Otis et al. 1986:5). The Pisgah and Nantahala National Forests grew out of this 1911 authorization.

By the turn of the twentieth century there was an increased push for road construction. With the completion of the highway through the Cowee Mountain Gap in 1926, Franklin became connected to Dillsboro and the Western North Carolina Railroad. Another major east-west route is US 64, stretching from Morgantown to the southwest. Figure 8 shows the vicinity, prior to US 64, with a series of narrow, winding roads. Although two structures are shown along the Cullasaja River, both were likely destroyed by US 64. Another structure, shown in the Cliffside Lake area was probably destroyed by the construction of the CCC facilities. The US 64 corridor is well described:

US 64 through the majestic Cullasaja Gorge remains one of the region's most memorable scenic highways. Hairpin curves, steep overlooks, and spectacular views of Cullasaja and Dry Falls offer an uncommon motoring experience (Bishir et al. 1999:372).

The highway was originally proposed in 1923-24, but the corridor was dismissed as unbuildable.



The creation of a new district office in Asheville, however, revived the plans and in 1925 John Smith, the project engineer, and T. Brewster, the superintendent, began the construction process using air compressors, wagon drills, a steam shovel, farm wagons, 14 mules, two horses, and about 20 African American prison laborers. The road in Macon County was completed in 1928. Bishir and her colleagues (1999:51) report that this new route brought autos into scenic tourist spots, including Lake Lure, Chimney Rock, and of course Highlands.

Highlands is a resort town that owes its existence to two Midwestern developers, Samuel T. Kelsey and Clinton C. Hutchinson. In the mid-1870s the pair purchased over 800 acres in the Blue Ridge township and laid out the 1½ -square-mile town originally called “Kesley’s Plateau.” Later the name was changed to Highlands in a nationally distributed brochure. The effort was successful and the town quickly became a summer resort, attracting residents from South Carolina, Georgia, Louisiana, and elsewhere (Bishir et al. 1999:373).

As Macon County moved further into the twentieth century the forces of agriculture began to slowly give way to tourism and, particularly, an increase in retirement communities and vacation homes. This is resulting in additional pressures on the fragile archaeological resources of the region.

The Forest Service, the CCC, and a Context for the Highlands Recreation Area

There are a number of readily available histories of the CCC, such as Hayden (1985), Lacy (1976), and Salmond (1967). There is also a Forest Service publication that provides more detail on their role in the CCC (Otis et al. 1986). A similar document, highlighting the role of the National Park Service, as the other major user of CCC resources, is also available (Paige 1985). Another Forest Service document outlines the development of the agency’s recreation philosophy and practices (Tweed 1980). There are also two documents providing samples of recreation improvements specifically associated with the Forest Service (Kircher 1935, Anonymous 1940c), as well as the multi-volume work of a similar nature published by the National Park Service (Good 1999).

The bulk of the primary documents are included in several National Archives collections. Record Group (RG) 35 includes the records of the CCC, with the great majority of the records under the heading of “General Records of the Emergency Conservation Work and Civilian Conservation Corps” (RG 35.2). Records specific to the Forest Service involvement are found in RG 95 (Records of the Forest Service), specifically RG 95.8, Records of Operating Units Responsible for Civilian Conservation Corp (CCC) Activities). Within this collection, those records for the Southern Region

(Region 8), which includes North Carolina, are found in RG 95.9.8. These records are held at the Atlanta Branch of the National Archives and include both textual materials and maps showing the progress of CCC activities and the location of CCC camps. The Forest Service Region 8 Architect in Atlanta also has a great deal of material from CCC project. These include, for example, the original plans for the Cliffside Bath House. None of these resources were available to us given the greatly truncated project schedule demanded by the Forest Service.

The Forest Service in the Pisgah and Nantahala area has also prepared two documents on CCC resources – one for bridges (Ashcraft and Snedeker 1999) and another for a transportation route (primarily stone work associated with culverts; Bassett and Snedeker 2000).

The Forest Service and Recreation

Tweed (1980) explains that the Forest Service's involvement in recreation began very early (although others question the importance of the role the Forest Service allowed recreation to play in an agency oriented toward timber production). The 1919 annual *Report of the Forester*, for example, specified that any planning of forest uses that failed to take into account "recreation resources" would be incomplete (Tweed 1980:1). As early as 1915 the Forest Service, under the *Term Occupancy Act*, allowed private use and development of public forest lands for terms of up to 30 years by persons or organizations operating resort and recreation facilities (Tweed 1980:3). Perhaps the Forest Service's first public campground was developed in 1916 in the Oregon National Forest at Eagle Creek (Tweed 1980:4). As pressure mounted for the creation of the National Park Service in the first decades of the twentieth century (which the Forest Service opposed), efforts to fulfill recreation needs in the forests accelerated – and a large number of "automobile camps" were created.

Efforts to make recreation planning more sophisticated suffered a variety of set-backs, including the resignation of the agency's first

landscape architect, charged with recreation planning, in 1922 after four years of struggles with little or no money (Tweed 1980:12-14). The Forest Service sought to replace expert advice with foresters and collaborators – and for the next decade, "foresters, whether academically trained in recreation work or not, carried out the Forest Service recreation program" (Tweed 1980:13). While the monies allocated were miniscule -- \$37,631 in 1925, reaching \$52,050 by 1930 – the proposed improvements were modest. In fact, Tweed reports that in 1925 the average cost of improving a campground was only \$250.

In 1925 there were approximately 1,500 campgrounds on National Forests, with about two-thirds of these "undeveloped." By 1930 the number of fully or partially developed campgrounds had increased to 1,493. While the improvement seemed exceptional, the Forest Service had seen a 38% increase in recreational use during the same period (Tweed 1980:13). With the coming of the Depression, funding for recreational improvement was cut. Carr comments that it wasn't until 1935 that the Forest Service finally began to stop resisting the importance of recreation planning (Carr 1998: 279).

The Origin of the CCC and Its Relationship to the Forest Service

While the single greatest impetus for implementing the idea of creating a work force for conservation projects was the Great Depression, the idea had been circulating long before the country lapsed into massive unemployment. In addition, once the Depression hit, both individual states and even the Hoover administration began implementing similar programs on a modest scale. Conservation or reforestation programs were begun in New York, California, Washington, Virginia, Wisconsin, Pennsylvania, Michigan, and Indiana (Paige 1985). Even the Society of American Foresters advocated a program for the employment of men in the nation's forests to work on erosion, watershed, road, and trail projects.

It wasn't, however, until the election of Roosevelt that the program was given national

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attention. Within days of his inauguration on March 4, 1933 Roosevelt was proposing "an act for the relief of unemployment through the performance of useful public work." By March 31 the legislation was signed into law. On April 3 representatives of the Departments of War, Labor, Interior, and Agriculture began to work out the details and this meeting led to Executive Order 6101 on April 5 that officially began the Emergency Conservation Work (ECW) as the CCC was initially called.

The program would take single men between the ages of 18 and 25 (described in the program as "juniors") who could demonstrate need. They would be paid \$30 a month and were required to send \$25 of it to their dependents (by 1942 an enrollee could receive \$8 in cash per month, with another \$7 per month placed in a savings account until he was discharged, and the remaining \$15 sent to his dependents). Each CCC camp was to be staffed with 200 men and the bulk of the CCC monies were to go to labor costs - in other words, a bulldozer would not be eligible for funding since there were enough men to do the same work.

Camp sites and work projects were selected by the Departments of Interior and Agriculture; the U.S. Army constructed the camps. Often local citizens near a site were hired to actually construct the camp. National Forests were ideally suited for CCC projects, and the USDA Forest Service administered over half of all public works projects (Otis et al 1986:1).

During the first year the types of projects conducted included forest improvement, construction and maintenance of fire breaks, clearing of campgrounds and trails, construction of fire and recreation-related structures, road and trail buildings, forest fire suppression, flood and erosion control, survey work, bridge building, tree disease control, insect control, campground construction, and landscaping. Projects were done in national and state parks (the state parks were just beginning and the CCC dramatically affected the development of state-level recreation

facilities), as well as on national forests.

In 1937 Congress passed new legislation that formally established the CCC, thus changing the name from ECW. Yet Roosevelt was unsuccessful in having the CCC made a permanent agency. This new law also set aside 10 hours a week for educational or vocational training (this was further expanded in 1939).

By 1938 funding was being cut and the program was forced to begin cutting camps. By 1939 desertions from CCC camps was on the increase as the ablest young men were beginning to obtain employment outside the CCC (especially in higher paying national defense jobs) and families became less dependent on the \$25 a month allotment. Moreover, it became more difficult to recruit capable, appropriate candidates. The end of the CCC came on July 2, 1942.

CCC Activities on National Forests

One of the greatest hindrances to the development of a coordinated recreation program was the absence of leadership, especially from Washington (Tweed 1980:13, 16-17). As a result, the Forest Service began to realize that their CCC work did not compare well in quality of construction to that being performed by the State and National Parks. In June 1934 John Guthrie, a general inspector in the Forest Service CCC program wrote:

The N.P.S. early in the CCC took on both experienced landscape engineers and architects, paid them from ECW funds. We have followed no such policy and moreover had been using plans made for the earlier regime of scanty funds. When the CCC show is over, I fear our recreation improvements and our public campgrounds are going to suffer by comparison with those on State Parks and National Parks, and the public may well ask why

CULLASAJA GORGE PROJECT, HIGHLANDS RANGER DISTRICT, NANTAHALA NATIONAL FOREST

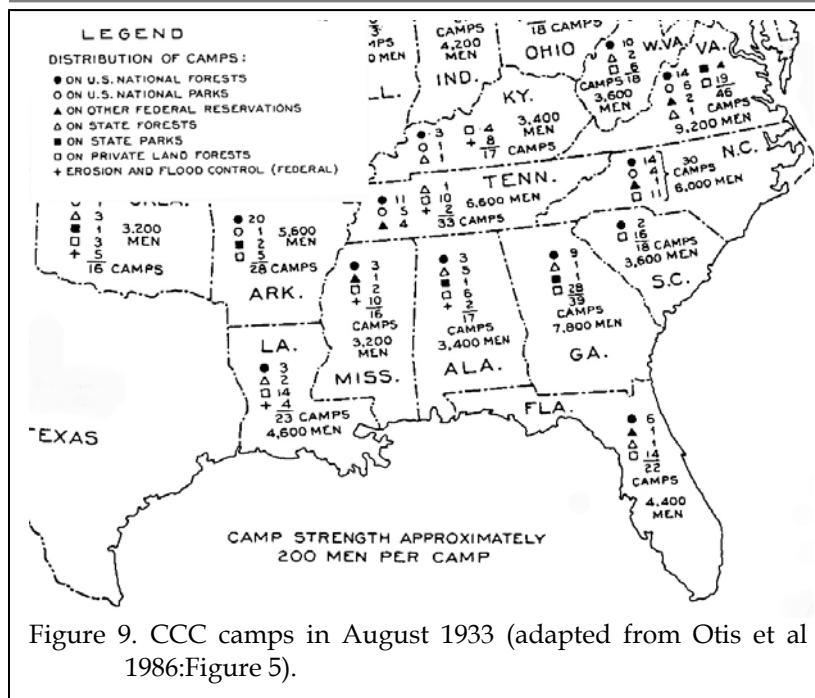


Figure 9. CCC camps in August 1933 (adapted from Otis et al 1986:Figure 5).

didn't we do as well with the same means at our command (quoted in Tweed 1980:17).

In part, the quality of NPS activities was the result of their embracing professional expertise. Carr notes that over a thousand design and engineering professionals were directly or indirectly supervised by the National Park Service during the mid-1930s. By 1934 five states that previously had no state parks (Mississippi, New Mexico, Oklahoma, Virginia, and South Carolina) acquired between one and six. By 1936 90,000 CCC enrollees were at work building state parks in 475 camps, with the CCC already developing or planning to develop half of the nation's 3.5 million acres of state parkland. By the end of that year they had built 4,800 miles of roads, 899 swimming areas, almost 2,000 road and trail bridges, and over 100 overlook shelters in state parks in 44 states (Carr 1998:268).

Tweed recounts that a series of studies were subsequently conducted, all with very similar findings. One chief problem observed throughout the National Forests was with "the appearance of structures and facilities" – absent guidance, there was too much striving for

individual styles and these – absent professional involvement – were often poor. There was a focus on quantity – not quality (Tweed 1980:20). Gradually there were improvements and the nature of Forest Service projects improved, both in scope and quality. In 1937 the Forest Service appointed Robert Marshall, a forester and naturalist, as the head of the new recreation office. While the Forest Service did hire more professionals to guide its recreation activities, they were almost exclusively hired as temporary employees, without Civil Service protection (Tweed 1980:25).

Figure 9 shows CCC activities in Southern states,

including North Carolina in August 1933. There were 14 camps on the state's four national forests, with probably about 2,800 enrollees. Otis and her colleagues, however, are able to itemize only six of these (Otis et al. 1986:184), with only one (Camp 10) on the Nantahala, located at Aquone, 14 miles west of Franklin on the far western side of Macon County. Ashcroft and Snedeker (1999:22) report that one of the 14 camps, while administered by the North Carolina National Forests, was actually located in Tellico Plains, Tennessee. Of the remaining 13 camps in 1933, nine were on the Pisgah National Forest and three were on the Nantahala (Table 1a). Table 1b provides similar information from an alumni organization for CCC enrollees – there are some differences between the two that only additional research will resolve. Nevertheless, these tables provide some initial information on the CCC groups that were operating within the Nantahala and that might have worked on the various Highlands projects. We recommend that additional research be conducted at the National Archives to resolve some of these differences.

We have also been able to locate annual reports for 1940 and 1941. While very late in the program, they do provide some concept of the

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Table 1a.
CCC Camps on the Nantahala National Forest (adapted from Ashcraft and Snedeker 1999:23-24)

Camp No.	Company No.	Camp Name	Location (PO)	Date Occupied
NC F-9	405	Nawokada	Franklin, Macon Co.	June 7, 1933
NC F-10	408 JW	Winnfield Scott	Aquone, Macon Co.	May 28, 1933
NC F-12	425C	Nathaniel Greene	Rainbow Springs, Clay Co.	June 28, 1933
NC F-13	435	Bob Reynolds	Topton, Cherokee Co.	June 27, 1933
NC F-19	455	Horse Cove	Highlands, Macon Co.	October 6, 1935
NC F-20	3445JW	Cowee	Franklin, Macon Co.	April 22, 1935
NC F-23	3446JW	Coweeta	Otto, Macon Co.	May 30, 1935
NC F-29	2450V		Murphy, Cherokee Co.	Sept, 29, 1939

Table 1b.
CCC Camps on the Nantahala National Forest (adapted from the CCC Alumni web site, www.cccalumio.org)

Camp No.	Company No.	Camp Name	Location (PO)	Date Occupied
NC F-9	405	Neorakada	Franklin, Macon Co.	May 28, 1933
NC F-12	425C		Rainbow Springs, Clay Co.	June 28, 1933
NC F-12	3444C	Buck Creek	Franklin, Macon Co.	June 28, 1933
NC F-13	435	Bob Reynolds	Topton, Cherokee Co.	June 21, 1932
NC F-20	3445		Franklin, Macon Co.	July 2, 1935
NC F-23	3446	Cowee Creek	Franklin, Macon Co.	July 14, 1935
NC F-24	3447	Santeetlah	Topton, Cherokee Co.	August 21, 1935
NC F-28	408		Aquone, Macon Co.	May 28, 1933

Notes on nomenclature:

Camp No. = Letter designation for the organization to which the camp was assigned, with F meaning National Forest; the number was intended to be a unique identifier (although Table 1b reveals that there may have been two camps F-12).

Company No. = Number given by the federal government to each company. Some have a letter following the number. "C" stands for colored, meaning the company was made up of African Americans. "V" would stand for veterans of WWI and an "X" or "Mix" would indicate an integrated camp (which was very unusual). Ashcraft and Snedeker indicate that "JW" was "Junior White," but this designation would apply to most camps.

Camp Name = this could be a person's name or a place name. It provides relatively little locational information.

Location = This is generally the closest town, or post office, to the camp and provides a generalized location for the camp.

Date Occupied = This represents the reported beginning date of the camp's occupation.

amount of CCC work being conducted in North Carolina. In 1940 there were 323 camps on the nation's National Forests, with about nine camps on the Nantahala (Anonymous 1940a:51, 80). The National Forests had, on average eight of the 42 camps in North Carolina, suggesting that many of the camps in western North Carolina were

operated by other agencies.

By 1941 the *Annual Report* explained that many camps were being transferred to military reservations as part of the war effort, but that in the Appalachian area the CCC was still carrying on "extensive development," including "tree planting, protective developments, timber stand improvement, stream development, and extension of public recreation areas" (Anonymous 1941:36). The number of camps in North Carolina actually increased to 45, and the number on National Forests held steady at eight.

Table 2 compares the activities in North Carolina between the two years. Clearly a great many recreation projects were being conducted, although they were certainly spread between agencies.

The Rise of Recreation and the Forest Service Philosophy

As this overview explains, the Forest Service was involved in recreation activities for decades prior to CCC undertakings, although many of their "improvements" were at best modest and of poor quality.

The Forest Service, after decades of

Table 2.
CCC Activities in North Carolina in FY 1940 and 1941
(adapted from Anonymous 1940, 1941)

Activity	1940	1941
Bathhouses	1	0
Cabins, overnight	3	2
Dwellings	6	4
Storage buildings	6	6
Garages	6	3
Latrines	50	34
Lookout towers	6	5
Shelters	3	1
Other buildings	19	22
Camp stoves or fireplaces	5	1
Corrals	1	0
Signs, markers	392	461
Stone walls (feet)	907.5	115.5
Table and benches	35	93
Landscaping (acres)	369.9	1,668
Parking areas and overlooks (yd ²)	491	48,219
Campground development (acres)	3	17.8
Picnic ground development (acres)	1	6

fundamental human requirements, provides the opportunity. Park and forest areas for recreation use have increased tremendously under the stimulus of the CCC program. . . . Recreational facilities of all kinds built by the enrollees . . . have been put to use by the public as rapidly as the CCC has been able to build them (Anonymous 1940b:3).

For the Appalachian Region the publication indicates:

Though streams are abundant, natural lakes are rare in this unglaciated country, and the CCC has built a number of large ones, particularly in State parks (Anonymous 1940b.:9)

Other activities included the construction of campgrounds, picnic areas, ponds, and bathing facilities.

placing little emphasis on recreation, slowly began to realize its importance and in 1934 the Chief of the Forest Service issued a policy statement to Regional Foresters, instructing them to give more attention to the “social” functions of the Forests as they developed emergency programs with the CCC.

By 1937 the Forest Service had received a report warning that it must “overhaul and improve our methods of handling Recreation.” Specifically, it was critical that more services be provided to the “sharply mounting tide of recreationists” (quoted in Tweed 1980:22).

A CCC pamphlet, *The Civilian Conservation Corps and Public Recreation*, explained the rationale behind these types of projects:

Proper use of our increasing leisure time is the safety valve of modern life, and outdoor recreation, amid surroundings inviting a fresh grasp of

It is probably no coincidence that a Forest Service publication of 1935 says very much the same thing, noting the “marked reduction in working hours and days have revealed a need for greatly increased opportunities for using leisure hours in enjoyment of the natural and primitive beauties with which this country abounds” (Kircher 1935:1). This was followed by the policy statement that, “recreation as an activity must take its place in the coordinated development of National Forest resources” - and this led to the development of a guide for recreation facilities that the CCC used in southern forests (Kircher 1935:2).

These changes were brought about by a variety of factors, including increased prosperity and associated rise of what became known as “conspicuous consumption.” Introduced in 1908, Ford’s Model T initially sold for \$280, although the price steadily dropped to about \$200. Annual automobile production rise from 2 million during the 1920s to 5.5 million by 1929 - resulting in one auto for every five Americans. This had profound

affects on American society and culture.

Escaping railroad schedules and route limitations, the automobile allowed American to go where, and when, they chose. One historian remarked that Henry Ford freed common people from the limitations of their geography. A new mobility was created that resulted in exceptional cultural and social changes. In 1924, an innkeeper in California combined hotel and motor to coin the word, "motel," creating a new fascination. City dwellers suddenly had a new opportunity to take a "Sunday drive" and explore the rural countryside. Rural America had cities, along with their markets, suddenly more accessible.

Automobile owners found that cars provided one of the least expensive means of vacationing - of getting away from the new industrialized stresses of city life. Paved roads were far more common than just a decade or two earlier, and campgrounds and motels sprang up along these routes to serve this new public. It was this new, mobile, class that agencies such as the Forest Service sought to service by the mid-1930s.

The Depression gave the nation a thorough understanding of just how important the automobile had become. Cars had become more than a convenience - they had become part of everyday life, perhaps even a fixation. Replacement parts were scavenged and repairs were improvised from whatever could be found. Period observer Will Rogers said that Americans would be the first people to go to the poor house in an automobile.

Otis and her colleagues attempt to explain the design philosophy that guided the CCC work with the Forest Service. They note that a "nonintrusive design and certain construction techniques help establish the unique identity of buildings" and they exhibit "the romantic ideal of incorporating traditional or native styles into the Forest Service architecture" (Otis et al. 1986:215). This is echoed by Ashcraft and Snedeker, who point out that the CCC recreation site landscape designs have roots in work by Downing, Olmsted,

and others who sought design in harmony with nature. They note that, "period buildings represent a hybrid of influences from vernacular architecture to the Shingle and Arts and Crafts styles, most commonly referred to as Rustic style" (Ashcraft and Snedeker 1999:20). They point out that the craftsmanship is distinctive and the materials - rough stone, heavy timber, and logs - are those of vernacular construction, but their use is more varied.

As Otis and her colleagues mention, there is some degree of uniformity - logs are often used for railings, window sills, and lintels, rock is used for foundations and fireplaces, and so forth. In addition, there were several design guides used by both the National Park Service and the Forest Service, that provide suggested layouts and designs (for example Kircher 1935, Anonymous 1940c; most notably Good 1999). The architectural style created by the Forest Service (Otis et al. 1985:215) was similar to the styles used by a variety of agencies as well as by contemporary developers of private camps and retreats. Evidence of it can be seen widely, for example in the design of the Blue Ridge Parkway (Bright 1986, Jolley 1985, Swaim 1986). In particular we have previously commented that the style used by the Forest Service not only had antecedents within the Service, but was heavily affected by the work being done by the National Park Service and on State lands. Good, while addressing technical issues at length, provides little in the way of philosophical background, beyond noting that the "rustic" or "pioneer" style is:

legitimized or not by harmony or the lack of it. We are learning that harmony is more likely to result from a use of native materials (Good 1999:2).

Otis et al (1988:215) suggest that by the 1940s the approach was beginning to be viewed by some as "an affectation, deliberate, and self-conscious, overly sophisticated, and romantic." As a result, the designs shifted to uniformity and functionalism - what others might characterize as

drab, boringly consistent, and even militaristic. We have found seemingly little to support such a view. While Tweed (1980:26) terminates his discussion in the early 1940s, he does not suggest any repudiation of earlier styles. As late as 1945, W. Ellis Groben, the Forest Service's Chief Architect, was publishing a technical pamphlet explaining the techniques of building with logs – exactly as was done a decade earlier by the CCC (Fickes and Groben 1945). Most significantly, Robert Speer, the Region 8 Forest Service Architect, sees no evidence to support this contention, noting that the structures are still built using very similar designs today (Robert Speers, personal communication 2004).

Regardless of the interpretations or feelings, the CCC-era structures do possess a unique feeling and association and they are associated with a very limited time period of construction. Consequently they are often

shelters, and cooking shelters. The shelter at Cliffside Lake is not only shown as a plan (Cooking Shelter, Region 8 Drawings, B-7101 through B-7103), but a photograph is included (Cooking Shelter Cliffside Lake, Plan B-5700).

Also present at Cliffside Lake was an amphitheater, with stage and firebox, registry shelter, and bath house – all illustrated in the Forest Service's *Recreation Improvement Handbook* (Anonymous 1940c). The amphitheater is of special interest since Good (1999:2:197) described such locations “where the evening hours may be passed with song and story in the warmth of good comradeship and the friendly fire.” He notes, too, that the outdoor theater is best located in a “natural half-bowl” to promote sight-lines. The stage should be to the east or north, to prevent the audience from staring into the setting sun. Setting can be easily constructed of logs (as it was at Cliffside) and the campfire, built in front of the

stage, can also serve “to illuminate the stage at night in lieu of footlights or other lights” (Good 1999:2:198).

Recreational Activities in the 1940s

There is general agreement that with the termination of the CCC and the beginning of WWII, recreational development activities were curtailed. Nevertheless, a 1941 summary revealed that on the National Forests

there were 2,300 developed camp-grounds, 572 picnic areas, 1,381 recreation areas offering camping and picnicking, 254 winter sports areas, 54 federally built organization camps for people of modest means, and 11 federally financed resorts (Tweed 1980:26).

That same year a comprehensive planning

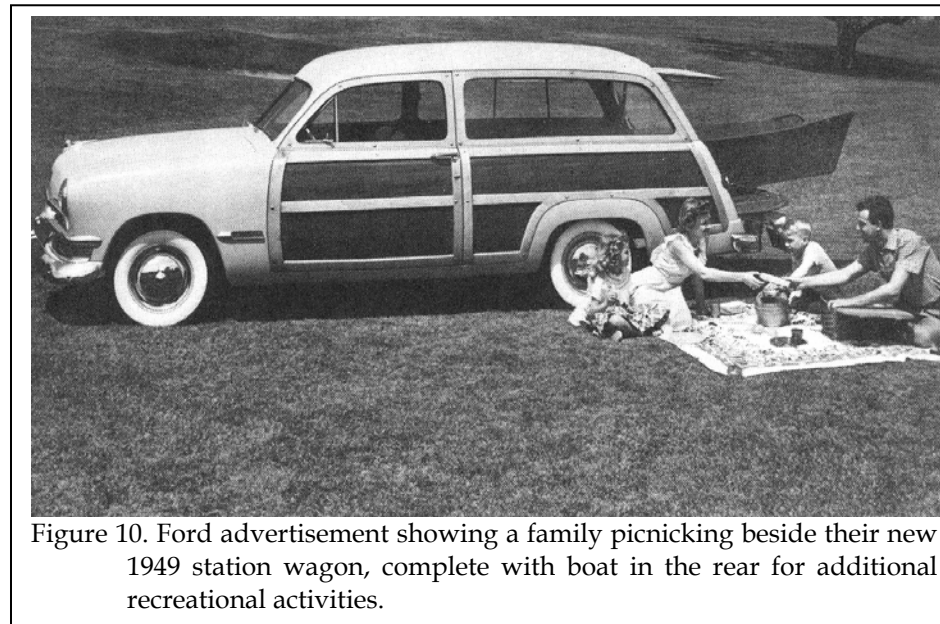
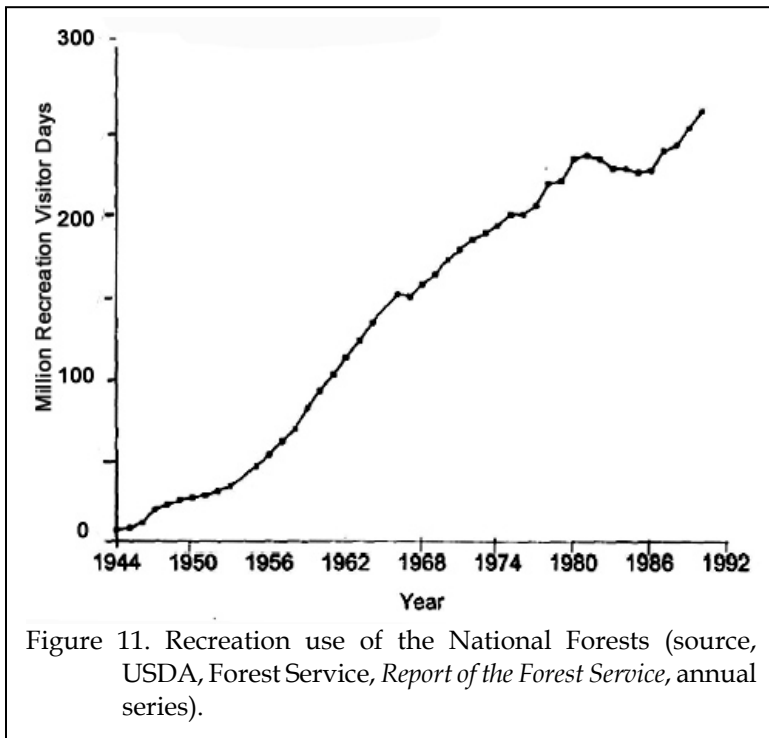


Figure 10. Ford advertisement showing a family picnicking beside their new 1949 station wagon, complete with boat in the rear for additional recreational activities.

evaluated as significant resources.

The portion of the 1935 handbook that we have been able to identify reveals a number of picnic shelter designs from Regions 7 and 8 (Kircher 1935). The later edition (Anonymous 1940c) illustrates nine different plans, including pump shelters, community shelters, picnic

PREHISTORIC AND HISTORIC OVERVIEW

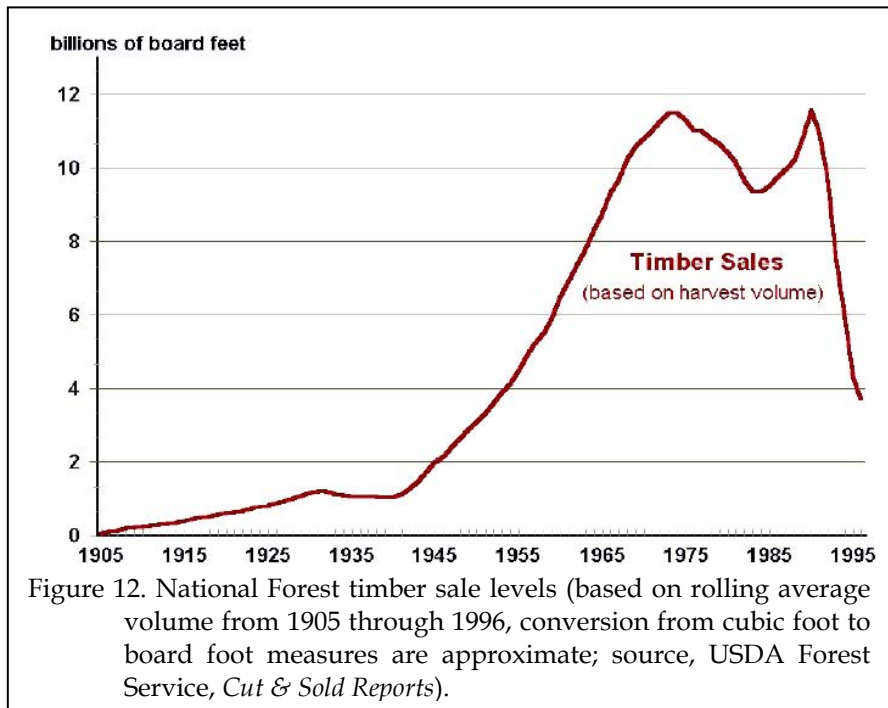


water recreation – was a prerequisite of most popular outdoor activities of the time. The document also emphasized the need to carefully define picnic and campground areas to avoid spreading their impact over too wide an area. But the study also reminded planners that the facilities should not be too concentrated, since that would deny visitors the scenic beauty and enjoyment they can to enjoy (Carr 1998:298).

Clearly many of these lessons had been learned – and applied – during the CCC work. Cliffside Lake is an excellent example of the various features all coming together: the presence of water suitable for damming, recreational activities clustered at this site, but spread out over 50 or so acres, the development of a bath house to ensure access to the water feature, and the development of an amphitheater to allow for organized activities.

document, *A Study of the Park and Recreation Problem of the United States*, was finalized. It reported on demographic trends demonstrating that outdoor recreation interests had not yet peaked; that leisure time would continue to increase; the population would continue to grow older; and the distribution of income would continue to flatten. All of these trends would place increased pressure on public lands to provide recreational opportunities (Carr 1998:297).

The document was also a planning guide – emphasizing that a primary concern for planners was road construction to parks, as well as the availability of “native” materials for facilities construction. Another critical issue was the suitability of the site for dam construction, since a lake –



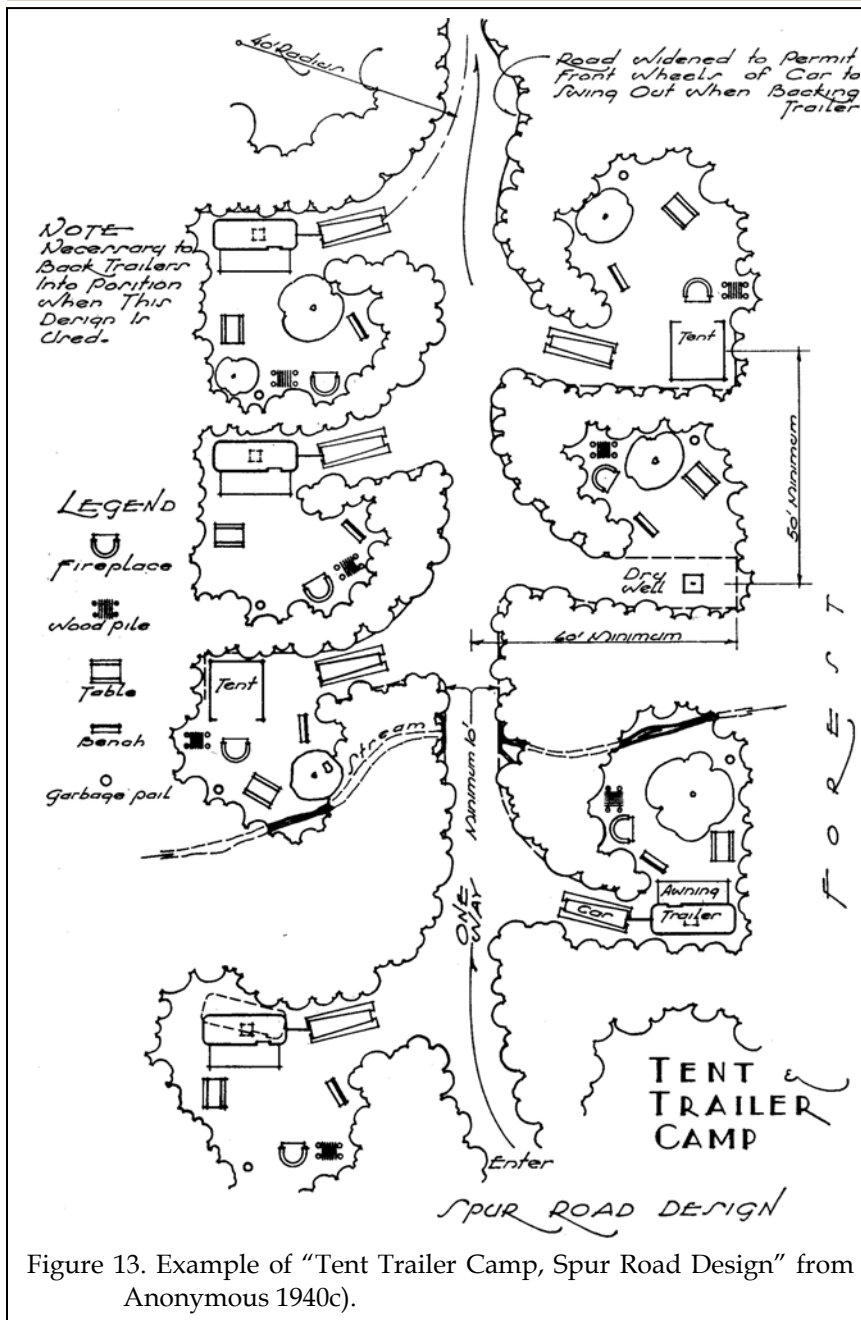


Figure 13. Example of "Tent Trailer Camp, Spur Road Design" from Anonymous 1940c).

With the end of the war, there was a renewed demand for automobiles – and plenty of excess capacity to meet that demand. Americans renewed their love affair with the automobile. From 1949 to 1972, the number of cars in the U.S. increased from 45 million to 119 million. Gas was abundant – and cheap, about 10¢ a gallon. During the 1950s the birth rate soared, largely supported by the burgeoning middle-class, peaking in 1957.

spurred by the post-war housing demand. This conflict is generally thought to have resulted in the 1960 Multiple Use Sustained Yield Act that required Forest Service (and BLM) lands to be managed for recreation, range, timber, water, fish, and wildlife – with no one activity given greater consideration than another.

Considerable efforts were spent to create

Consumerism expanded, expanding earlier conspicuous consumption and increasing consumer credit from \$8.4 billion in 1946 to \$45 billion in 1958.

The renewed emphasis on the family and the post-war economic boom created the anticipated demand for more recreation opportunities. The first Holiday Inn opened in 1952, Howard Johnson restaurants (begun in 1936) numbered 400 in 32 states by 1954, followed by the opening of Disney Land in 1955 and McDonald's restaurants in 1956. These signaled the rise of fast food, and the vacation and resort industries (Stearns 2001). The 1956 Federal Aid Highway Act authorized the construction of a multi-billion dollar, 41,000-mile interstate highway system, as well as providing aid for primary, secondary and lesser roads.

Forest Service lands were certainly part of this new demand for recreational opportunities – and Figure 11 reveals this dramatic increase in recreational use. This steady growth after World War II, however, conflicted with the equally steady growth of timber sale levels (Figure 12)

trailer camps – such as Van Hook – that provided a perfect mix of convenience and idyllic nature. Figure 13 shows one such plan along with careful notations to ensure ease of vehicle backing. Although the Forest Service publications provide no detailed discussion, Good (1999) gives considerable advice, especially focusing on the shift from “car and tent camping” to “car and tent trailer camping.”

He notes that the addition of the trailer requires redesign of parking and camping spaces. Further discussions are provided regarding the necessity of – and problems associated with – other amenities, such as water, electric service, and waste disposal. He comments that while at one time it was suitable to provide safe water within 200 feet, toilets within 400 feet, and washhouse and laundry no more than 1,500 feet from the camp site, competition with other forms of recreation – namely hotels – demand that at least some conveniences be provided at the individual parking spaces. In particular he notes that water and sewage disposal are appropriate, while electrical connections seem too complex (Good 1999:3:8).

Although we have been unable to document the evolution of enabling legislation, the 1915 *Term Occupancy Act* that allowed private recreation leases apparently had morphed into the Land and Water Conservation Fund Act and title V of the Independent Offices Appropriation Act of 1952, which allowed special use leases for recreation. These, or similar, laws were apparently used by the Forest Service to lease lands within the Highlands Recreation Area for private recreational development during the 1950s (Rodney Snedeker, personal communication 2004).

METHODS

Archaeological Field Methods

The initially proposed field techniques involved the placement of shovel tests at 100-foot intervals along transects, also spaced every 100 feet. Shovel testing, however, would not be conducted in areas of steep slopes (15+%).

All soil would be screened through ¼-inch mesh, with each test numbered sequentially by transect. Each test would measure about 1 foot square and would normally be taken to a depth of at least 1.0 foot or until subsoil was encountered. All cultural remains would be collected, except for mortar and brick, which would be quantitatively noted in the field and discarded. Notes would be maintained for profiles at any sites encountered.

Should sites (defined by the presence of two or more artifacts from either surface survey or shovel tests within a 50 foot area) be identified, further tests would be used to obtain data on site boundaries, artifact quantity and diversity, site integrity, and temporal affiliation. These tests would be placed at 25 to 50 foot intervals in a simple cruciform pattern until two consecutive negative shovel tests were encountered.

The information required for completion of North Carolina site forms would be collected and photographs would be taken, if warranted in the opinion of the field investigators.

These proposed techniques were implemented with no modifications. A total of 208 shovel tests were excavated in the three areas examined (McCall Cabin, Van Hook, and Cliffside Lake). No shovel testing was conducted at Dry Falls since the area was either steeply sloping or covered in asphalt. Forty-nine tests were excavated at McCall Cabin, 78 were excavated at Van Hook (with steeply sloping sections not tested), and 81 were excavated at Cliffside Lake (with steeply sloping areas not tested). The

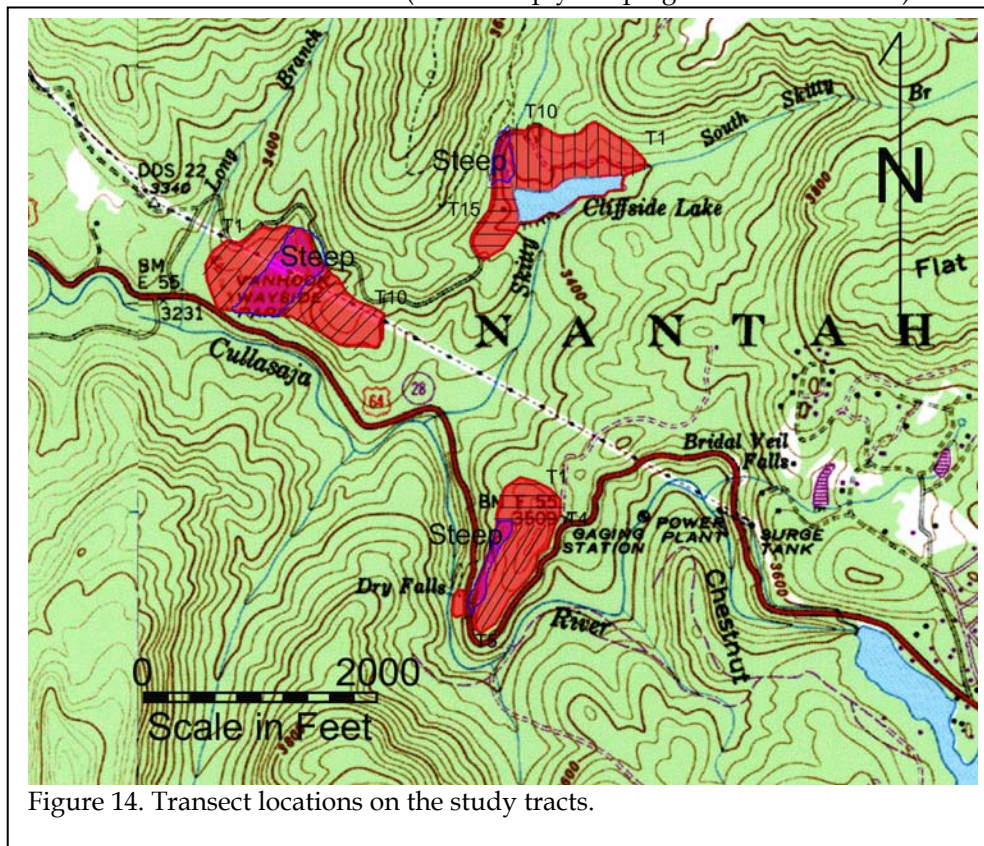




Figure 15. Shovel testing at Cliffside Lake (lake in background).

location of these transects is shown in Figure 14.

The GPS positions were taken with a Garmin GPS 76 rover that tracks up to twelve satellites, each with a separate channel that is continuously being read. The benefit of parallel channel receivers is their improved sensitivity and ability to obtain and hold a satellite lock in difficult situations, such as in forests or urban environments where signal obstruction is a frequent problem. This was a vital concern for the study area. With 3D differential potential horizontal errors of less than 10 m are expected. All GPS coordinates are given using the NAD27 datum.

Architectural Survey

As previously discussed, this study includes only an architectural reconnaissance designed to provide some basic guidance and assistance to the Forest Service. To provide full evaluations of these structures would require the definition of a relatively large area of potential effect (APE) and develop a context the includes CCC and Forest Service involvement in recreational activities. There was not time in the current project for such work.

At each identified research we took at least one photograph and this report provides a brief account of the resource and its potential significance.

Site Evaluation

Archaeological sites will be evaluated for further work based on the eligibility criteria for the National Register of Historic Places. Chicora Foundation only provides an opinion of National Register

eligibility and the final determination is made by the lead federal agency (in this case the Forest Service), in consultation with the State Historic Preservation Officer at the North Carolina Department of Cultural Resources.

The criteria for eligibility to the National Register of Historic Places is described by 36CFR60.4, which states:

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

- a. that are associated with events that have made a significant contribution to the broad patterns of our history; or
- b. that are associated with the lives of persons significant in our past; or
- c. that embody the distinctive

characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

d. that have yielded, or may be likely to yield, information important in prehistory or history.

National Register Bulletin 36 (Townsend et al. 1993) provides an evaluative process that contains five steps for forming a clearly defined explicit rationale for either the site's eligibility or lack of eligibility. Briefly, these steps are:

- identification of the site's data sets or categories of archaeological information such as ceramics, lithics, subsistence remains, architectural remains, or sub-surface features;
- identification of the historic context applicable to the site, providing a framework for the evaluative process;
- identification of the important research questions the site might be able to address, given the data sets and the context;
- evaluation of the site's archaeological integrity to ensure that the data sets were sufficiently well preserved to address the research questions; and
- identification of important research questions among all of those which might be asked and

answered at the site.

This approach, of course, has been developed for use documenting eligibility of sites being actually nominated to the National Register of Historic Places where the evaluative process must stand alone, with relatively little reference to other documentation and where typically only one site is being considered. As a result, some aspects of the evaluative process have been summarized, but we have tried to focus on an archaeological site's ability to address significant research topics within the context of its available data sets.

Laboratory Analysis and Curation

The cleaning and analysis of artifacts was conducted in Columbia at the Chicora Foundation laboratories. These materials have been catalogued and accessioned for curation at the North Carolina Office of State Archaeology, and will be forward to the Forest Service at the conclusion of the project.

The site forms for the identified archaeological sites have been filed with the North Carolina Office of State Archaeology (31MA630, 31MA631, and 31MA632). Copies of the site forms, and field notes have been prepared for curation using archival standards and will be transferred to the Forest Service as soon as the project is complete (Accession Nos. 240274, 240275, and 240276). The only photographic material from this project consists of digital images or color prints, neither of which are archival. These materials will be retained by Chicora Foundation.

Analysis of the collections followed professionally accepted standard with a level of intensity suitable to the quantity and quality of the remains. In general, the temporal, cultural, and typological classifications of prehistoric materials were defined by such authors as Yohe (1996), Blanton et al. (1986), and Odell (2004).

ARCHITECTURAL ASSESSMENT AND NATIONAL REGISTER EVALUATION

Introduction

The Highlands Recreation Area was established in 1949 as a 737-acre tract to be "set apart and reserved for public recreation use and closed to all other occupancy and use except such uses as the Regional Forester may authorize as being consistent with recreation use" (Dedication on 1949 plat).

This Recreation Area appears to be eligible for the National Register of Historic Places as a district which possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. The Highlands Recreation Area Historic District is significant under National Register Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (it represents a significant and distinguishable entity whose components may lack individual distinction).

Within the district are buildings, sites, structures, and objects that contribute to its significance. Elements that do not contribute are generally those that were originally constructed after 1949. The district includes three areas which themselves are considered historic districts: Van Hook Glade, Cliffside, and Dry Falls, as well as the complex of natural and constructed features at Bridal Veil Falls. It also includes the McCall Cabin, which cannot be finally evaluated until a planned reassembly is complete.

The section of US Highway 64 adjoining the Highlands Recreation Area is a contributing resource to the historic district. Bishir and her colleagues (1999:372) briefly discuss this resource

and its history and additional information is provided below.

Previous Survey and Evaluation

The North Carolina SHPO has already placed Highway 64 from Highlands to Gneiss, a length of about eleven miles, on its Study List. This is a list of historic resources potentially eligible for listing on the National Register. Although we have not evaluated the 11-mile length considered eligible, the section of Highway 64 adjoining the Highlands Recreation Area is integrally related to the tract, both visually and functionally.

The Cliffside Lake Recreation Area was surveyed by the SHPO in 1994, and assigned Survey Site Number 510. The survey site form "Cliffside Lake Recreation Area" notes several support features: three gazebo/summer houses (picnic shelters, etc.), the bath house, a swing set, and dam. In a previous letter, the SHPO indicated that the bath house at Cliffside was eligible for the National Register (see August 28, 1989, letter from NC SHPO to David A. Hammond, Recreation Staff Officer with the Forest Service).

Ongoing Survey and Evaluation

For the present project, we completed US Forest Service forms for CCC sites, and Intensive Survey forms for McCall Cabin, the Recreation Lots, and Bridal Veil Falls. While these forms are not the standard documents used by the North Carolina SHPO for survey and evaluation, together with the photographs attached they provide sufficient information for National Register evaluations.

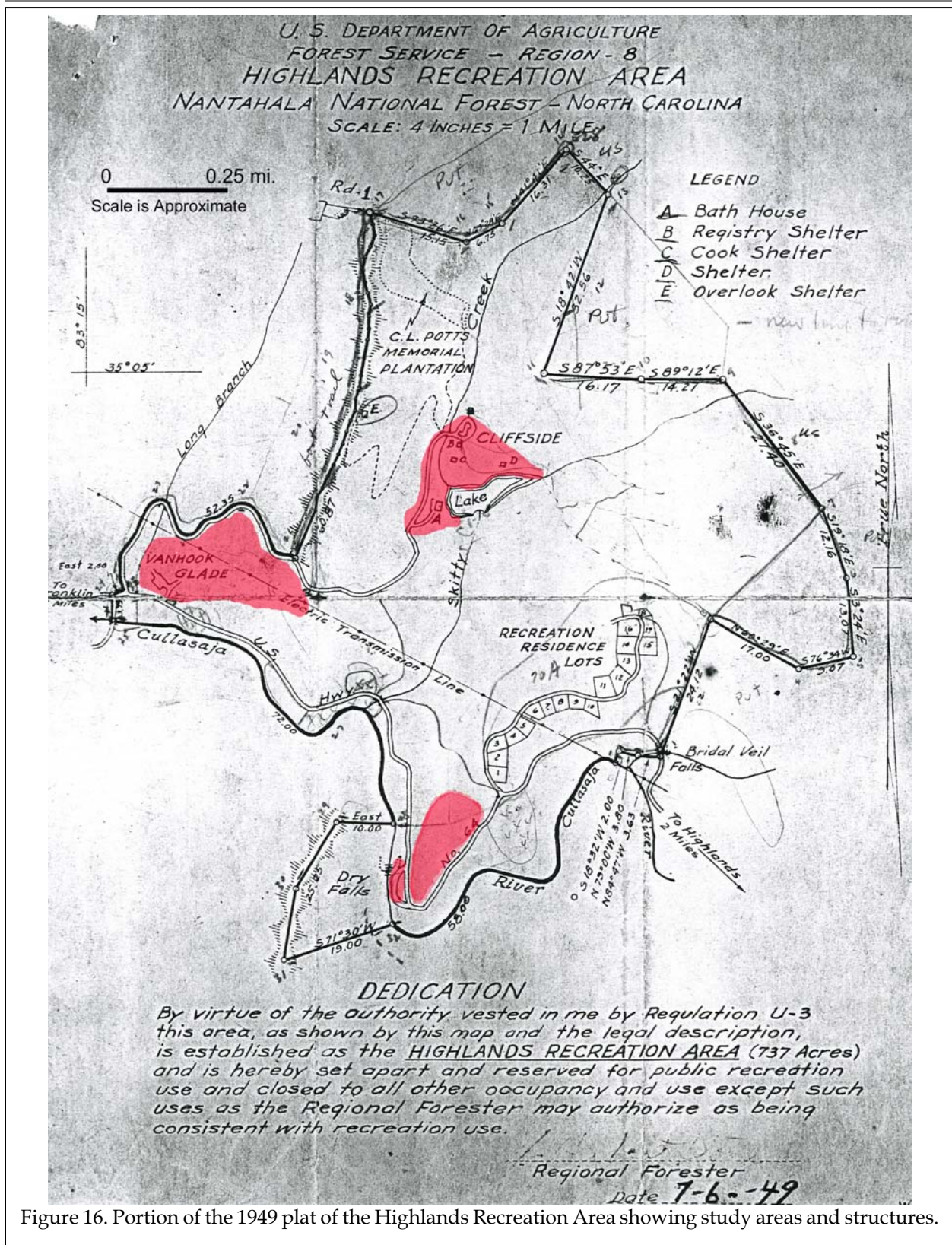


Figure 16. Portion of the 1949 plat of the Highlands Recreation Area showing study areas and structures.



Figure 17. Landscape and viewshed of US 64. on the State's Study List.

These forms will be revised by the Forest Service over time. As properties are altered, and as additional information becomes available about their original construction, the Forest Service will update the files.

U.S. 64

In 1993 the Macon County Historical Society and the Macon County Board of Commissioners began a comprehensive survey of architectural resources in the county. The Principal Investigator, Jennifer Maxwell identified 49 resources that were identified as being added to the State Study List - a list of historic sites potentially eligible for inclusion on the National Register. One of these resources was "US 64 from Highlands to Gneiss," representing a length of about 11-miles. The roadway was assigned state site number MA474 and a series of 10 photographs document its condition.

It was about the same time that various environmental groups began pressing for the Cullasaja River to be added to the Wild and Scenic Rivers Program of the Department of the Interior (letter from Governor James B. Hunt to Secretary of the Interior Bruce Babbitt, dated October 20,

1994).

US 64 is the longest road in North Carolina, extending from the state's westernmost edge at Murphy to its easternmost, Manteo. It enters North Carolina at Angellico Gap as a four-lane divided highway between the Tennessee line and Murphy, North Carolina. From that point to Franklin it is two-lanes with intermittent hillclimb lanes. After descending the mountains, 64 widens to four-lanes in the Franklin area. East of Franklin (2,100 feet), two-lane US 64 ascends along the Cullasaja Gorge towards Highlands (3,800 to 4,100 feet). For about 7 miles the highway runs through the gorge, passing three large waterfalls (Cullasaja Falls, Dry Falls, and Bridal Veil Falls, west to east). From Highlands the highway descends toward the Jackson-Macon County line and crosses the Eastern Continental Divide.

This highway has an interesting history, its original construction between Gneiss and Highlands being evaluated as impossible and subsequently undertaken using "betterment funds," rather than "project funds." Work began

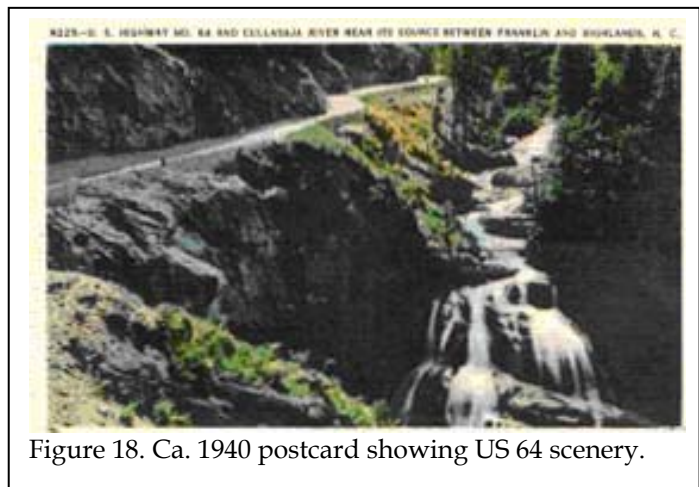


Figure 18. Ca. 1940 postcard showing US 64 scenery.

in 1925 and the road was completed in 1929 under the direction of John Smith, project engineer and T. Brewster, superintendent. The labor was supplied by about 20 African American prisoners who were housed in a series of camps that moved with the progress of the road (Siler 1985).

The road, however, is viewed eligible by the State Historic Preservation Office not only for its unique history, but also for its feelings, character, and association. While we have not found a specific statement of eligibility, the road appears eligible for the National Register under Criterion A, historic events and Criterion C, distinctive physical features. In 1997 the State Historic Preservation Office approved the placement of cor-ten guardrails along the "historic section" of US 64, but stated that a proposal to place guardrails "on top of the existing stone walls is not appropriate," posing an adverse affect to the historic fabric as well as the viewshed (letter from David Brock, NC SHPO to Joel Setzer, NC DOT, dated November 21, 1997).

US 64 through the Cullasaja Gorge remains largely unchanged since 1929 with one exception. Through at least the 1950s, US 64 used to pass *under* Bridal Veil Falls. Today the highway runs along the outside of the falls instead, while the old alignment remains as a turnout from the modern road and is one of the few roads that still passes behind a waterfall. Recently a large portion of the hillside above the falls collapsed, temporarily closing this turnout (www.ncroads.com/ushwys/us064.htm). These changes have not affected the eligibility of the 11-mile stretch of US 64 from Highlands to Gneiss.

There seems to be strong association between the eligibility of US 64 and the placement of the Cullasaja River on the DOI National Rivers Inventory. In 1995 24 miles of the river (from the spillway of Lade Sequoyah (Town of Highlands) to the confluence with Little Tennessee River) was placed on the National Rivers Inventory. Prior to that the U.S. Forest Service noted that about 7.5 miles of the river flow through the National Forest, but the Forest Service "would not object to adding the Cullasaja River to the NRI" and in fact,

"a preliminary assessment indicates that it is potentially eligible for consideration as a national wild and scenic river." The Forest Service also stipulated that the area's management was to "allow low impact recreation for viewing scenery, scientific study and photograph" (letter from Randle G. Phillips, Forest Supervisor to Robert Newkirk, National Park Service, dated May 9, 1994).

The DOI determined that the river should be listed on the inventory as a scenic river, meaning one that is free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads. Of the potential nine "outstandingly remarkable values" assessed by DOI, the Cullasaja is listed under eight: scenery, recreation, geology, fish, wildlife, history, and "other."

It seems clear that there is a strong association between the Cullasaja River and US 64 - that each resource helps support the other and the value of the two is far stronger than the value of either one alone.

Likewise, US 64 is strongly associated both historically and visually with the Highlands Recreation Area. The section of road adjoining the recreation area is eligible for the National Register as a contributing resource within a historic district that includes the entire 737-acre Highlands Recreation Area.

CCC Areas

Within the Highlands Recreation Area are several areas associated with Civilian Conservation Corps (CCC) construction in the 1930s. These areas retain above-ground resources including natural and constructed landscape elements (dam, walkways, retaining walls) as well as buildings and small-scale structures. Each of them, Cliffside, Van Hook, and Dry Falls, is itself eligible for the National Register as a historic district. Within these eligible CCC districts are buildings, sites, structures, and objects that are eligible for the National Register as individual



Figure 19. Historic photograph of the Dry Falls parking lot and entrance. Note the registration shelter design and rock entrance area.

shelter, and might be original CCC construction. Based on early photographs, there have been alterations to the wall, which appears to have been log, later stone with log rails, and today stone with chain link insets. Nevertheless, the remaining wall appears to be historically significant and is be a contributing component to the district.

Like the wall, the pathway to Dry Falls has been altered in several areas.

properties. There are also non-historic elements that do not contribute to the districts. Those elements that are visually compatible with the CCC-era construction are considered eligible unless they are documented as having been constructed after 1949.

The entrance has been reworked, and the fencing shown in the historic photograph has been replaced. We have not learned the date of the present stone, wood, and chain link fencing. Regardless of the dates when these elements were altered, the pathway is considered a contributing component to the district.

Additional information about original construction dates and previous alterations to some of the resources will be required in order to make final determinations as to status (contributing or noncontributing) within the district.

Van Hook

The restroom building at Van Hook Campground may be original CCC construction; it

Dry Falls

At the head of the walkway to Dry Falls is the "observation site" parking lot and a visitors' shelter. The present shelter is a replacement (date unknown) for an earlier shelter consisting of rock sidewalls with a simple gabled roof, and appears to have been placed on the site of the earlier building. The simple design and "rustic" construction of the existing shelter are compatible with other CCC and Forest Service buildings. Unless its construction date is determined to have been after 1949, it is considered to be a significant historic resource.

The stone wall marking the walkway appears to be earlier than the



Figure 20. Entrance to the Dry Falls site today. Note the rebuilt registration shelter and different rock work at the entrance.



Figure 21. Historic photograph of Dry Falls, showing what was probably the original CCC wood railing and wood bench – none of which remains today.

may post-date 1949. Determination of its status (contributing or noncontributing) will rely on the original construction date. The interior appears unmodified, although we have not been able to identify original plans or maintenance information. Exterior modifications are limited to modern (i.e., tinted plastic glazing in what appear to be aluminum frames) skylights. These may be recent additions or may be replacements of pre-existing historic features. In and of themselves, these alterations do not jeopardize the building's historic integrity.

A picnic shelter or pavilion shown in an early photograph of Van Hook Campground has been removed and replaced with a RV parking lot. We have not learned the date of this site alteration; however, it has not jeopardized the Van Hook Campground's overall historic integrity or its status as an eligible district, and a contributing property within the Highlands Recreation Area.

Cliffside

At Cliffside are five historic structures, the bath house, cooking shelter, registry shelter, picnic shelter, and observation shelter. The bath house has previously been determined eligible for the National Register (see August 28, 1989 letter from the NC SHPO to David A. Hammond, Recreation Staff Officer with the Forest Service). An historic postcard shows this building in relation to the lake. At that time, there was a heavily landscaped bank with steps leading down to the lake. This steep bank has been reworked (date unknown) as a shallower slope, although the steps remain. Landscaping has been removed and trees around which the original front entrance was designed have not been replaced as they died. Despite these changes, the lake remains an important aspect of the setting of the bath house. Moreover, as documented in the August 28 letter, the interior of the bathhouse, including the lobby and the two dressing rooms, remains virtually unaltered.

The "cooking shelter" features a central



Figure 22. Van Hook bathroom structure.



Figure 23. Registration shelter at Van Hook, possibly of CCC construction, that is no longer present.

chimney with four fireplaces. It is shown in an early design photograph, with the notation "Plan B-5700." The openings were recently infilled with stone. The building appears to be eligible for the National Register despite the adverse effect of this insensitive remodeling project.

The five CCC-era structures possess integrity of location, design, setting, materials, workmanship, feeling, and association. The setting is enhanced by small-scale historic elements that include steps, pathways, picnic tables, and drinking fountains.

There are early photographs depicting the amphitheater at Cliffside Lake. We could not learn its original location or when it was removed. Its loss is regrettable, but does not impair the historic integrity of the Cliffside Recreation Area. Efforts should be made to determine where the amphitheater stood, whether there are remnants of this significant construction, and whether they

justify an attempt to reclaim or reconstruct the amphitheatre.

Cliffside Lake and the dam that created it are eligible for the National Register. As examples of the heavy construction undertaken by CCC enrollees, they provide context for the smaller recreational structures and walkways.

Internal Transportation Routes

Internal circulation routes respond to the historic placement of buildings, sites, and objects within the district. Footpaths constructed as part of the Highlands Recreation Area, and the CCC-built areas within it, are significant when they retain integrity of location and materials. Gateposts, handrails, and steps constructed before 1949 are character-defining elements of the rustic recreation area. The limited number of access roads off Highway 64 contribute to the isolated

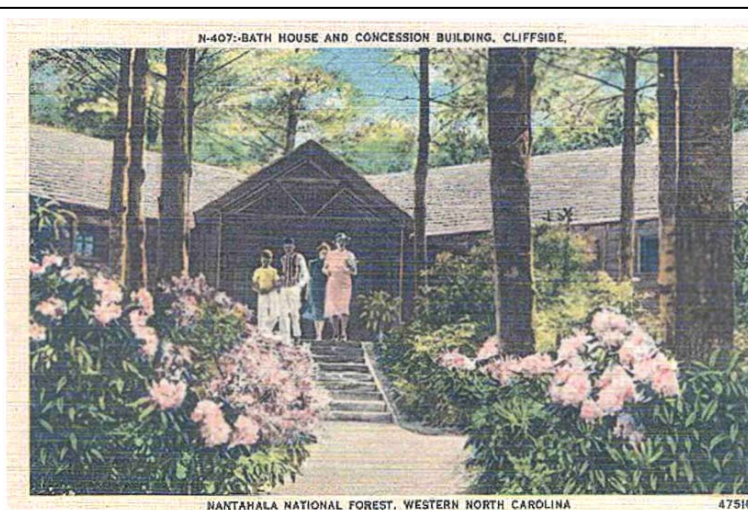


Figure 24. Historic postcard of the Cliffside Lake bath house. Note the steps and heavy landscaping – both of which are no longer present.



Bath house, note absence of steps and landscaping



Interior of bath house with repairs.



Bath house concession area.



Lake and far pavilion with stone steps to shore (D in Figure 16).



Small pavilion (B, Registry Shelter, in Figure 16).



Large pavilion (C, Cook Shelter, in Figure 16).
Note infilling of cook hearths.

Figure 25. Cliffside Lake CCC structures.

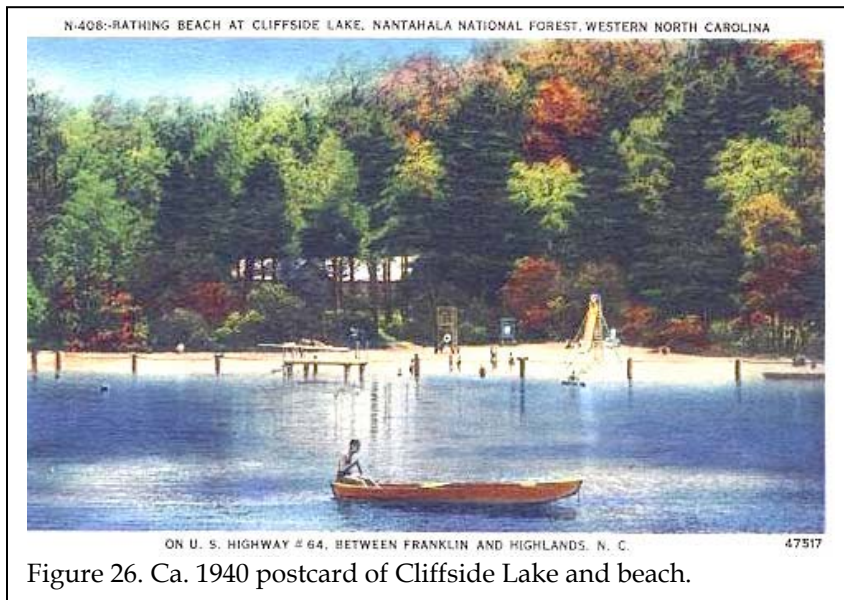


Figure 26. Ca. 1940 postcard of Cliffside Lake and beach.

feel of a mountain retreat. Although the main roads have been topped with asphalt or gravel, they retain their historic sense of time and place.



Figure 27. Original hydrant at Cliffside Lake.

Bridal Veil Falls

Bridal Veil Falls is one of the natural features that had to be taken into account by the engineers of Highway 64. The highway originally (1929) ran under the fall, but was rerouted in 1960 or before. The old turnout

has remained as an access to the falls. Bridal Veil Falls and the early highway are within the 1949 Highlands Recreation Area, and contribute to its historic significance. Rock retaining walls alongside the 1920s highway are compatible with CCC construction. Although information as to the connections between the scenic highway and the recreation area is not complete, the improvements around Bridal Veil Falls are contributing resources to the Highlands Recreation Area historic district.

McCall Cabin

The McCall Cabin is thought to represent a very early mountain cabin and was moved from its original site. The cabin has been disassembled and partially rebuilt. Ordinarily, structures that have been moved from their original locations are not considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they are a "building or structure removed from its original location but which is significant

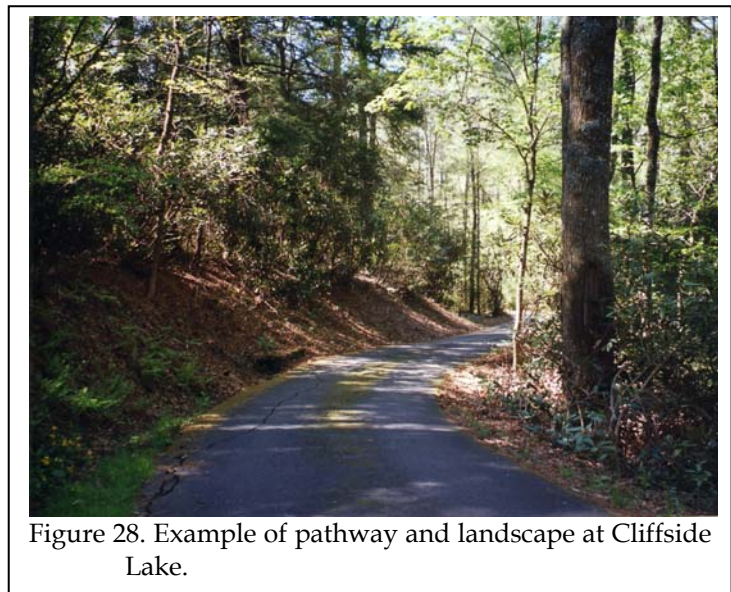


Figure 28. Example of pathway and landscape at Cliffside Lake.



Figure 29. McCall Cabin, showing setting and partially restored cabin.

consideration relies upon setting. Nevertheless, we have seen situations when the eligibility of a moved structure was enhanced through appropriate landscaping and site planning. The Secretary of Interior's Standards for Preservation also emphasize the importance of a property's "historical character" and even "spatial arrangements." This is an issue that the Forest Service should consult directly with the SHPO.

Recreation Residence Lots

The 1949 plat of the Highlands Recreation Area indicates eighteen lots intended for private lease. During the 1950s, residences were constructed on three of these properties. These are not contributing properties to the district, but they are compatible visually and historically and we do not recommend attempting to draw a district boundary that would exclude them.

Recommendations

Based on this study we offer several recommendations:

First, the resources identified in this study have been evaluated within the context of an appropriate APE, not as isolated structures. The resources must be evaluated in the context of an historic district, not as individual structures. These picnic shelters, rock walls, and other features must be evaluated in the context of their landscape and function as part of a larger recreation facility. This follows not only good practice, but also the specific requirements of the SHPO. It seems reasonable to use the historic 737-acre Highlands Recreation Area, which is a district eligible for listing in the National Register of Historic Places as this APE. A several mile section of US 64 is incorporated in this proposed APE as its southern border.

primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event."

In its present condition, the McCall Cabin cannot be said to possess integrity of design, setting, materials, workmanship, feeling, and association. However, if it is reassembled in a suitable manner, according to the plans drawn up before the move and according to the Secretary of the Interior's Standards for the Treatment of Historic Properties - Standards for Restoration, it may be found eligible. This also assumes that prior to undertaking the work, a document for restoration was developed as stipulated by the Secretary of Interiors Standards.

This structure may also assume greater importance as part of a historic district if it contributes to the "character and appearance" (see National Register Bulletin 4, *Contribution of Moved Buildings to Historic District*).

The issue of landscaping or property setting requires a brief discussion. There is nothing in National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, which addresses landscaping. In fact, moved buildings might be eligible for architecture, or for association with important persons. Neither

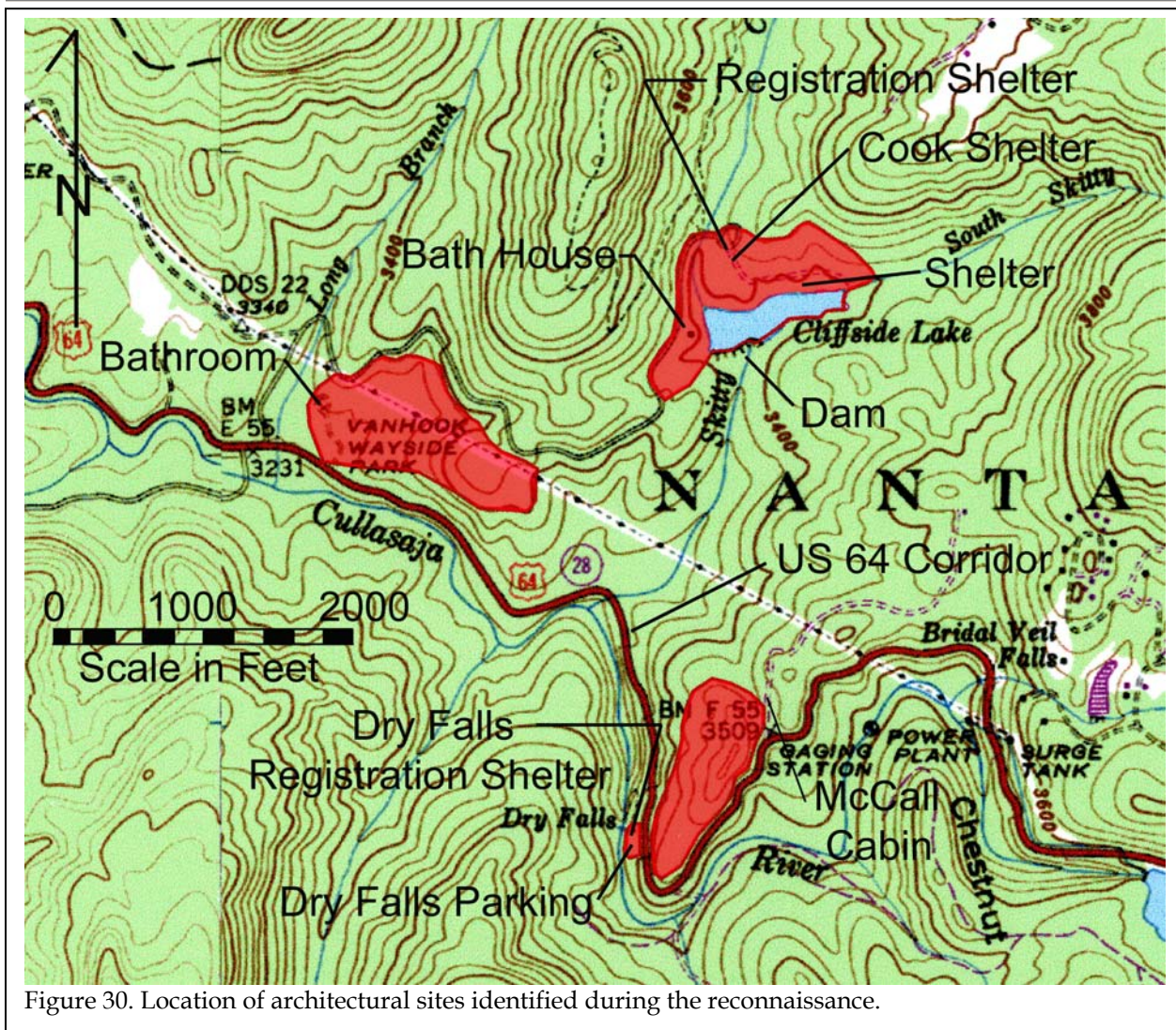


Figure 30. Location of architectural sites identified during the reconnaissance.

Second, the Forest Service should be proactive in complying with its Section 106 responsibilities. Because the entire 737-acre Highlands Recreation Area is considered the APE, proposals for any modifications of structures or alterations of the landscape must be submitted to the SHPO for comment. New construction such as a pedestrian bridge or new restroom facilities should be located in such a way as not to impact the landscape, viewshed, or historic resources.

Third, to further the appropriate maintenance of historic resources, it is essential that the Forest Service develop maintenance plans and keep a file for each building, pathway, small-

scale landscape element, or other feature. The inventory forms submitted with this report should become part of these files.

Fourth, in the past maintenance has been haphazard and often lacks care and consideration of the historic significance of the properties. All future maintenance must meet the Secretary of Interiors Standards for Treatment of Historic Properties. There are standards for preservation, rehabilitation, restoration, and reconstruction. These Standards, revised in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 Federal Register (Vol. 60, No. 133).

ARCHAEOLOGICAL SURVEY

Introduction

As a result of this survey, three archaeological sites (31MA630 - 632) were identified (Figure 31). All three sites represent surface scatters of prehistoric lithics. The remains are sparse and the sites exhibit poor integrity due to erosion and/or other earth moving activities. It is unlikely that these sites will be able to address significant research questions. All three sites are recommended not eligible for inclusion on the National Register of Historic Places.

Archaeological Resources

31MA630

Site 31MA630 consists of a surface scatter of prehistoric lithics located on a saddle between ridge tops adjacent to Cliffside Lake. Cliffside Lake is formed from Skitty Creek, which runs north-south and the lake was created as a CCC project during the 1930s. The elevation is approximately 3400 feet AMSL.

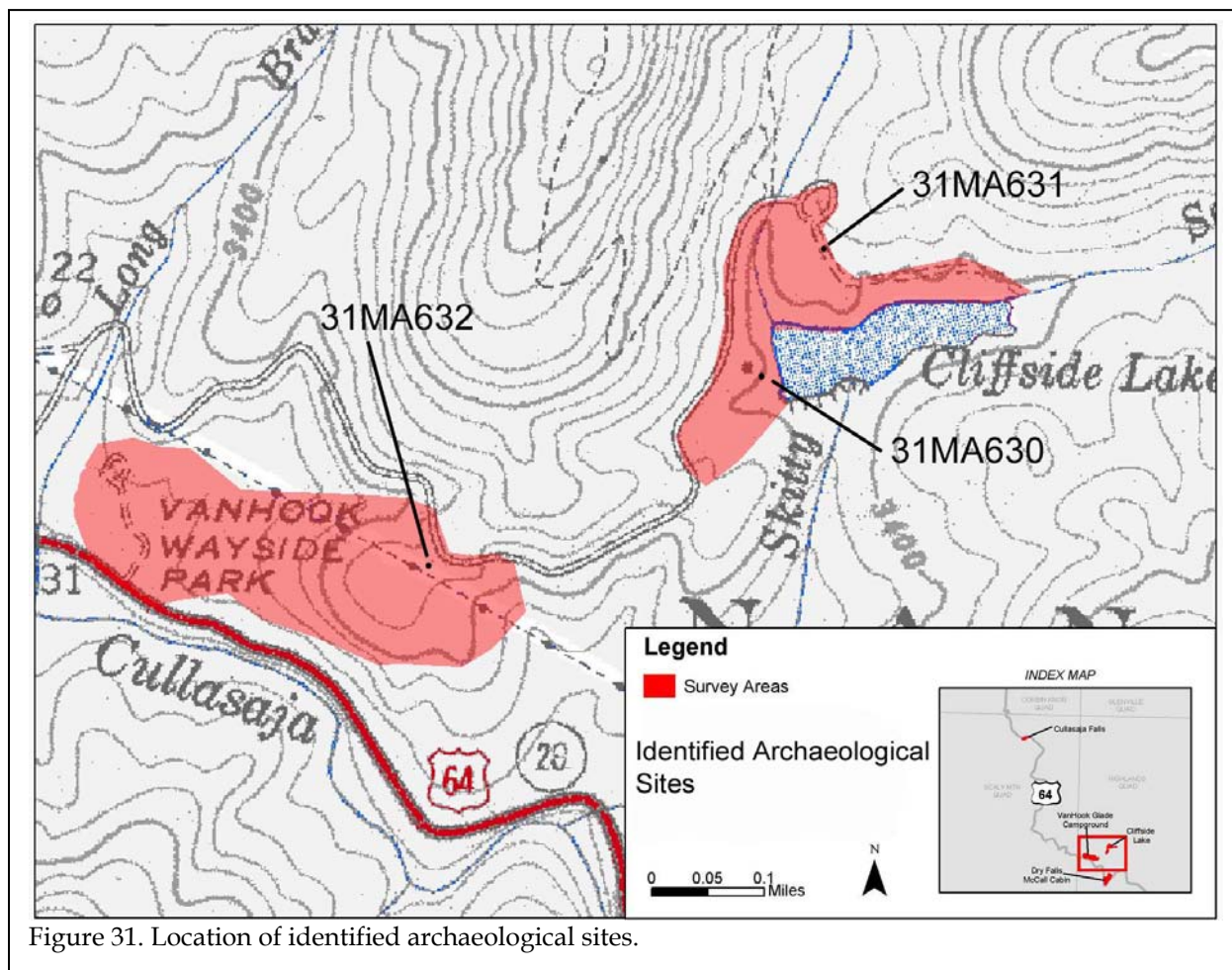
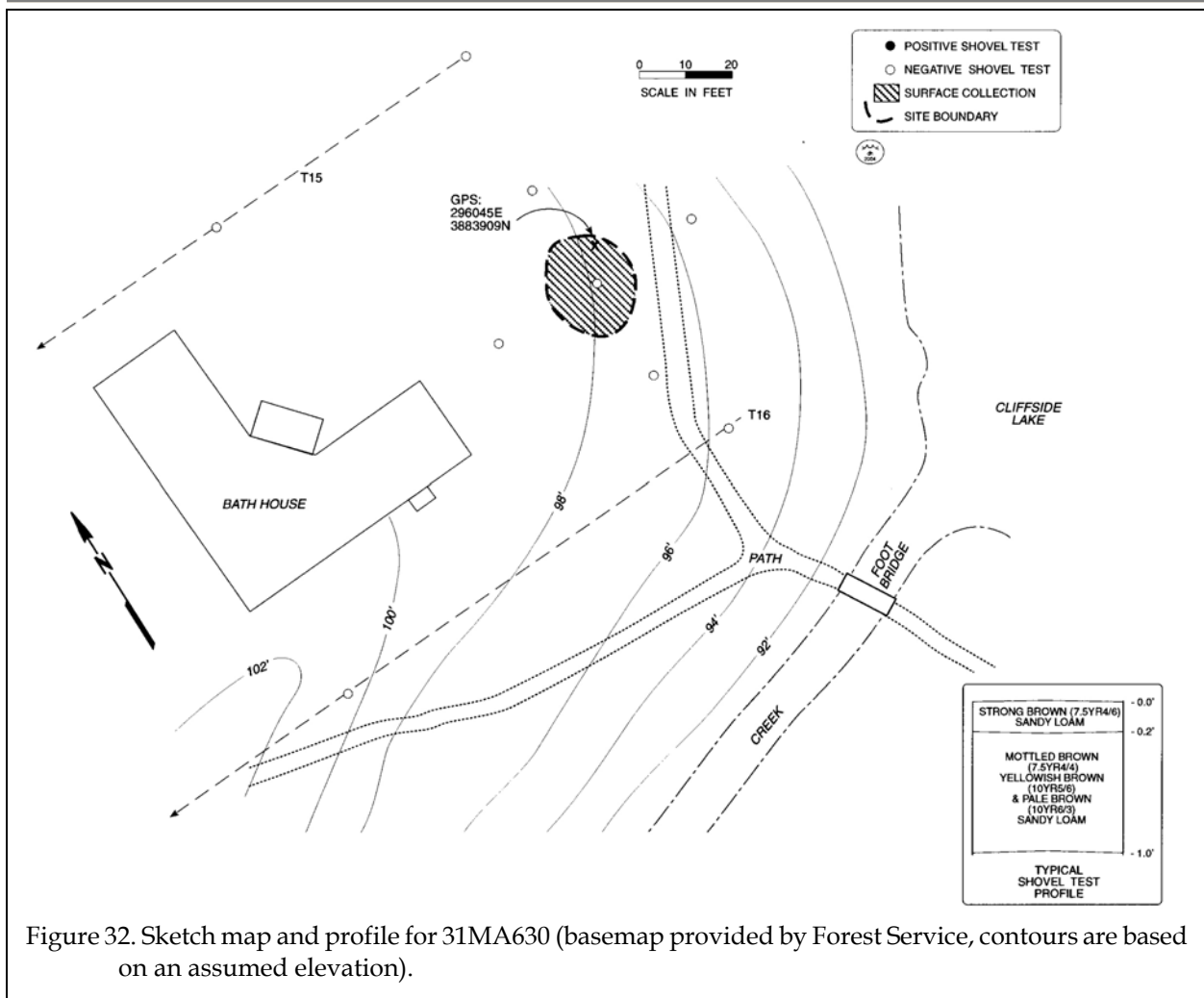


Figure 31. Location of identified archaeological sites.



Vegetation in the area consists of a dense pine and hardwood forest with slopes ranging from 8 to 95%. This site, however, was found eroding out of a bank in an area that has been converted to grass, although grass is still sparse. An historic postcard shows the area as previously landscaped in rhododendron and other plants, indicating episodes of change and possible erosion. A CCC-era bathhouse is located to the west of the site while a pathway and the lake are located to the east. This would place the site in the middle of a high foot traffic area. A central UTM coordinate is 296045E 3883909N (NAD27 datum).

Shovel testing was completed at the originally proposed 100-foot intervals, however, no subsurface artifacts were found. This site was

identified by lithics found on the surface. Close interval testing was performed at 25-foot intervals in the area of the surface finds (found between Transects 15 and 16 of Cliffside Lake, which ran from Cliffside Lake, west to a paved road). Again, no subsurface artifacts were found in the five additional shovel tests. Soils in the area resemble those in the Edneyville-Chestnut complex. The soils in the site consist of the well drained Edneyville soils.

Edneyville soils usually have a surface layer of dark yellowish brown (10YR4/6) fine sandy loam to a depth of 0.4 foot over a strong brown (7.5YR4/6) loam to 1.0 foot in depth. From 1.0 to 3.3 feet the loam turns into a sandy loam under which a mottled yellowish brown

ARCHAEOLOGICAL SURVEY

(10YR5/6), strong brown (7.5YR4/6), and light yellowish brown (10YR6/4) fine sandy loam lies to 3.6 feet.

The soil profiles in the site area, however, exhibited a strong brown (7.5YR4/6) sandy loam to a depth of 0.2 foot over a mottled brown (7.5YR4/4), yellowish brown (10YR5/6), and pale brown (10YR6/3) sandy loam to 1.0 foot in depth. It appears that this area has lost upwards of 3.0 feet of the original soil. This may be the result of CCC and later Forest Service landscaping activities.

As previously mentioned, the site yielded only prehistoric lithics, in particular, one quartz flake and another item that may be the basal fragment of a Morrow Mountain point. The estimated site area is 25 square feet. The one possible diagnostic artifact suggests a Middle Archaic date for the site. Otherwise the assemblage is very sparse, no in situ materials were encountered, nor were any features (recognized by darker soils, clusters of fire cracked rock, concentrations of artifacts, etc.) located at the site. The data sets present are limited in their ability to address significant research questions.

This site is small and may represent refuse resulting from tool maintenance, with the activity attracted to the elevation overlooking the nearby creek. However, this is the limit of the information that can be gathered by the sparse remains. Because of the site's inability to address significant research questions and damage to site integrity from erosion, it is recommended not eligible for inclusion on the National Register of Historic Places. No additional site management activities are recommended pending review by the Forest Service and the SHPO.

31MA631

Site 31MA631 is a surface scatter of prehistoric lithics located on a ridge saddle at an elevation of about 3425 feet AMSL. The site is located about 300 feet north of Cliffside Lake, which is formed from Skitty Creek.

Vegetation in the area consists of a dense pine and hardwood forest with slopes ranging from 8 to 95%. This site, however, was located just off a pathway between two historic pavilions (noted as the small and large shelter on the sketch map, also known as a registration shelter and cook shelter respectively). A central UTM coordinate for the site is 296122E 3884094N (NAD27 datum).

Shovel testing was performed at the originally proposed 100-foot intervals, however, the site, found by a small surface collection, was located between Transects 10 and 11 of Cliffside Lake. Close interval testing, at 25-foot intervals, was performed around the surface scatter (five additional shovel tests); however, no subsurface remains were unearthed.

Soils in the area resemble those in the Edneyville-Chestnut complex. The soils in the site consist of the well drained Edneyville soils. Edneyville soils usually have a surface layer of dark yellowish brown (10YR4/6) fine sandy loam to a depth of 0.4 foot over a strong brown (7.5YR4/6) loam to 1.0 foot in depth. From 1.0 to 3.3 feet the loam turns into a sandy loam under which a mottled yellowish brown (10YR5/6), strong brown (7.5YR4/6), and light yellowish brown (10YR6/4) fine sandy loam lies to 3.6 feet.

The soil profiles in the site, however, produced a strong brown (7.5YR4/6) sandy loam to a depth of 0.4 foot over a mottled brown (7.5YR4/4), yellowish brown (10YR5/6) and pale brown (10YR6/3) loam to 1.0 foot in depth. It appears that close to 3.0 feet of soil has been eroded or otherwise removed from the site.

The surface collection, measuring about 25 square feet in diameter, produced four quartz flakes and one quartz shatter. Much like the previous site, the remains may represent the result of tool maintenance or tool manufacture. However, with limited data set (only flakes), it is impossible for any significant research questions to be addressed.

Because of the site's inability to address

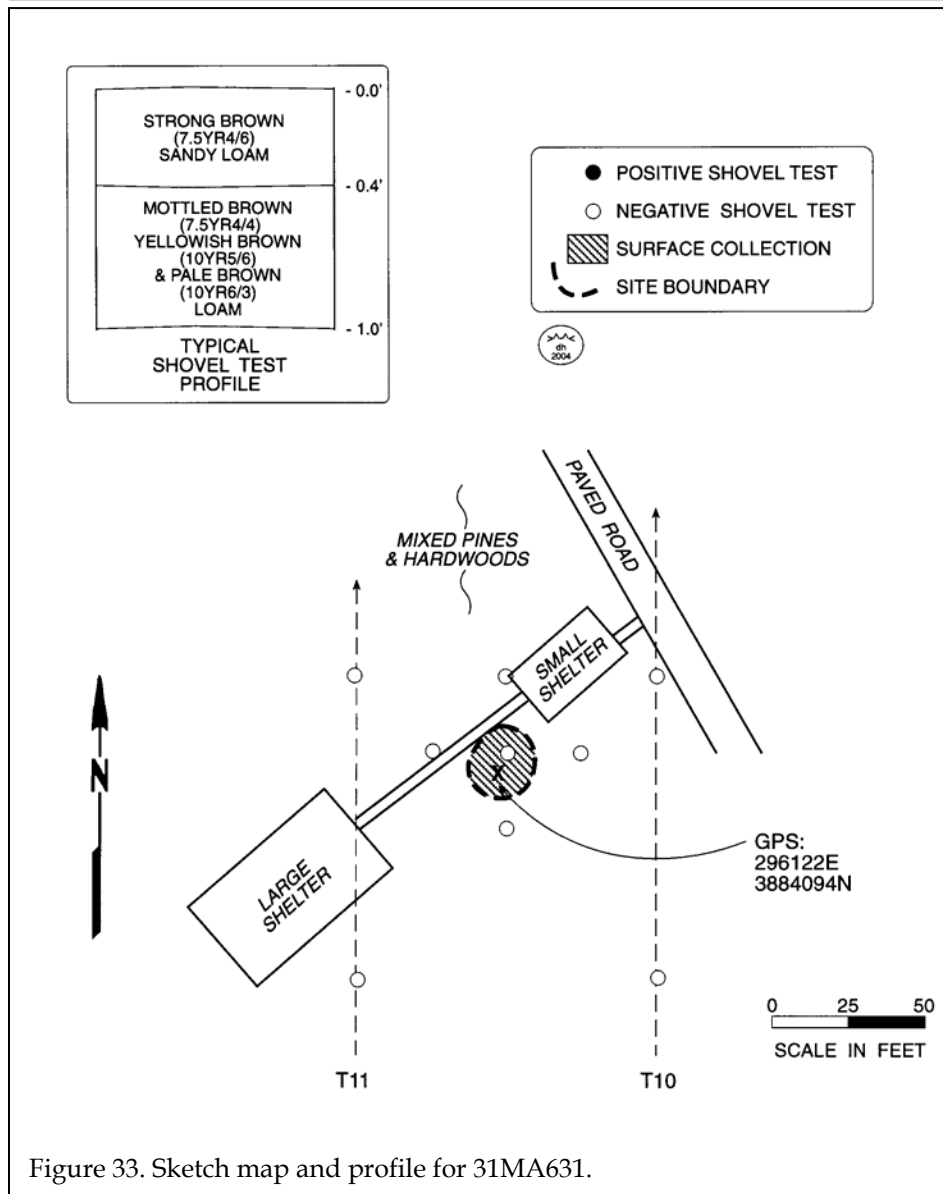


Figure 33. Sketch map and profile for 31MA631.

of 3450 feet AMSL. The site is located about 1200 feet north of the Cullasaja River in a transmission line right-of-way at the junction of the paved road going to Cliffside Lake and a dirt road/trail. Vegetation in the area consists of a dense pine and hardwood forest.

Shovel testing was performed at 100-foot intervals with Transect 11 of the Van Hook Campground running 25 feet east of the site. No subsurface remains were encountered, but the site was identified by its surface component. Close interval testing was performed at 25-foot intervals where surface remains were found (four additional tests); however no subsurface remains were found. A GPS coordinate for the site, which measures approximately 25 square feet, is 295555E 3883636N (NAD27

significant research questions and damage to the site's integrity from erosion and construction of a pathway and pavilions, this site is recommended not eligible for inclusion on the National Register of Historic Places. No additional site management activities are recommended pending review by the Forest Service and the SHPO.

31MA632

Site 31MA632 is a surface scatter of prehistoric lithics on a ridge saddle at an elevation

datum).

Soils in the area resemble those in the Edneyville-Chestnut complex. The soils in the site consist of the well drained Chestnut soils. These soils generally have a surface layer of dark brown (10YR3/3) gravelly fine sandy loam to a depth of 0.4 foot over a dark yellowish brown (10YR4/6) gravelly fine sandy loam to 2.0 feet. In actuality, the shovel tests produced a dark brown (10YR3/3) sandy loam to 0.6 foot in depth over a dark yellowish brown (10YR4/6) sandy loam. It

ARCHAEOLOGICAL SURVEY

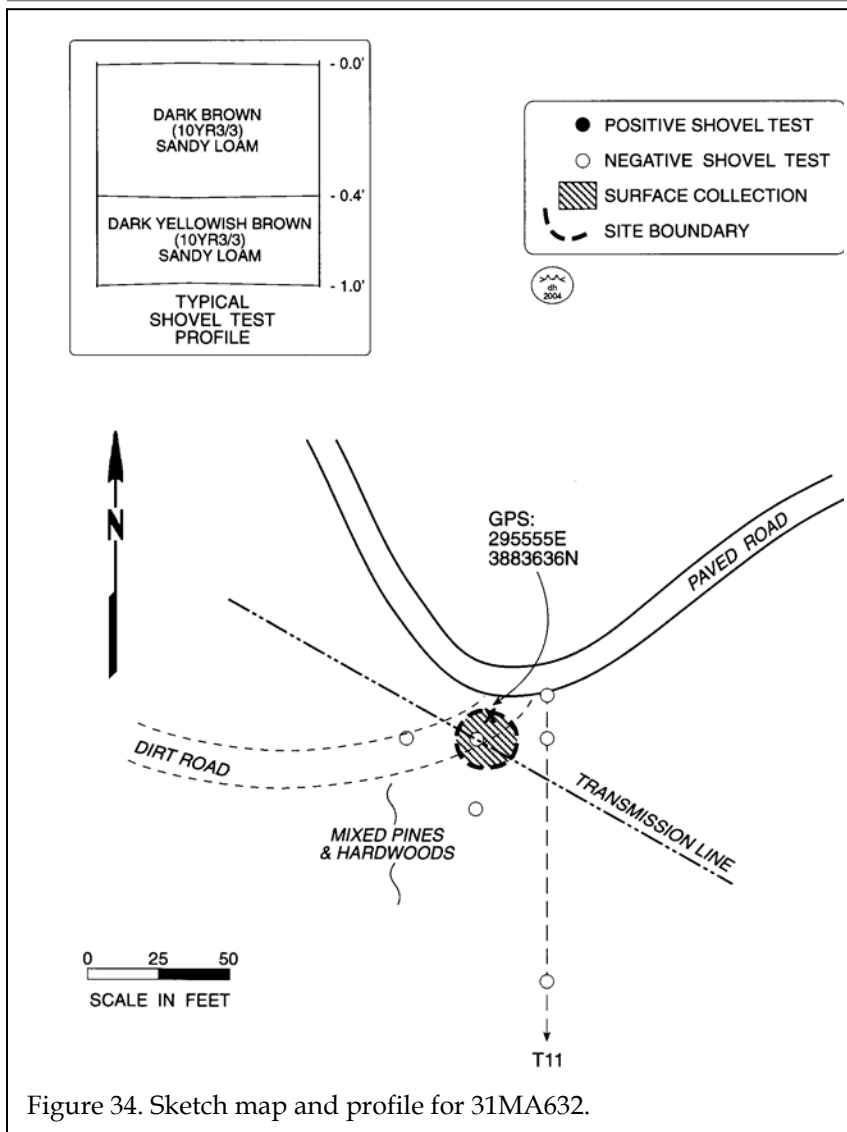


Figure 34. Sketch map and profile for 31MA632.

appears that erosion is not as significant at this site as in the previous two sites, in spite of the dirt road and powerline.

The surface collection area, measuring about 25 square feet in diameter, produced one quartz biface fragment, possibly a thumbnail scraper. The other recovered item is secondary flake possibly representing a scraper. Neither of these remains is diagnostic, but may represent an area of tool maintenance or manufacture. There is no indication of any features and while the stratigraphy of the soil suggests little or no erosion, the fact that there is no evidence of site

stratigraphy shows either short-term habitation or at least some sort of alteration in the environment.

This site does not contain the data sets necessary to address significant research questions and between the development of the transmission line and two roads, it is highly likely that the site has been altered in some fashion. Consequently, the site is recommended not eligible for inclusion on the National Register of Historic Places and no additional management activities are recommended pending review by the Forest Service and the SHPO.

Reputed Graves

We were informed by the Forest Service that “two child’s graves” are located on the Cliffside Lake survey tract. A sketch map from 1985 provides a general location – east of Skitty Creek on the north side of Cliffside Lake. This is in an area of a broad, relatively level terrace overlooking the lake, although it is today in

heavy undergrowth. Although we understand that several maintenance workers have seen the site, we were unable to obtain further information. It is not known if these “graves” are marked or unmarked and, if marked, by what type(s) of markers.

The area likely fell between Transects 10 and 12. No indication of graves were found on the transects. Afterward a pedestrian survey was conducted, but this also failed to identify the location of anything resembling graves.

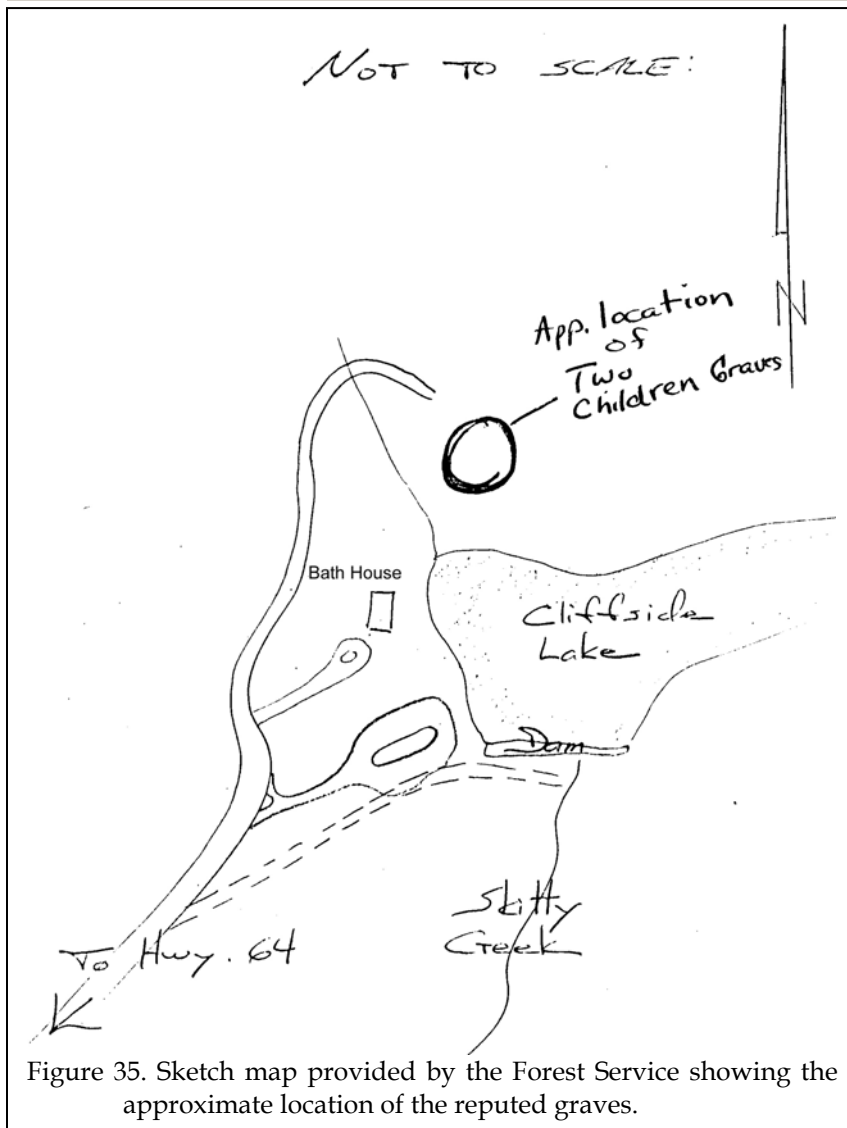


Figure 35. Sketch map provided by the Forest Service showing the approximate location of the reputed graves.

The area is lightly used for hiking and picnic activities. There are a number of dirt paths and concrete picnic tables in the area. At the time of this survey the area was already grown up and visibility was reduced. Graves may be present and simply eluded observation.

We recommend that an additional effort be made to identify those individuals who report having seen the graves. They should be able to provide either a better description of exactly what is present or, even better, accompany someone to the site.

Until additional effort is able to be directed to the identification of these graves, or it is possible to determine that what has been reported are not graves, this area should be

CONCLUSIONS

Archaeological Survey

This study incorporated an intensive archaeological survey of four tracts - Dry Falls, McCall Cabin, Van Hook, and Cliffside Lake - totaling approximately 77 acres. No archaeological investigations were conducted at Dry Falls since that very small tract was previously paved and the proposed actions are in areas of steep slopes. On the remaining three tracts shovel testing was conducted at 100-foot intervals on transects spaced 100-feet apart. All soil was sifted through ¼-inch mesh.

As a result of the intensive archaeological survey, three archaeological sites (31MA630-632) were identified. All three are represented by sparse assemblages of quartz flakes and several bifacial tools. These remains are unable to address significant research questions and the three sites are recommended not eligible for inclusion on the National Register of Historic Places. We recommend no additional management activities for these sites, pending their review by the Forest Service and the State Historic Preservation Office.

A reputed burial site with two children's graves at Cliffside Lake was not located by this survey. Although known about since at least 1985, we believe that additional information concerning the location and/or what was identified will be necessary in order to resolve this particular issue. Until that time, we recommend that the area of the reputed graves be avoided by all ground disturbing activities.

It is always possible that archaeological remains may be encountered in the project area during clearing activities. Crews should be advised to report any discoveries of concentrations of artifacts (such as bottles, ceramics, or projectile points) or brick rubble to

the District Ranger, who should in turn report the material to the District's Staff Archaeologist (the process of dealing with late discoveries is discussed in 36CFR800.13(b)(3)). No construction should take place in the vicinity of these late discoveries until they have been examined by an archaeologist and, if necessary, have been processed according to 36CFR800.13(b)(3).

Architectural Survey

This study also incorporated a architectural survey of structures and other above ground resources on the four tracts and a National Register evaluation of these resources.

A context for the Highlands Recreation Area that incorporates CCC and Forest Service recreation activities was developed. While additional research can certainly contribute additional insight to both the development of architectural styles as well as the viewsheds and landscape features of the study area, this context provides a frame of reference for Forest Service recreational activities in the 1930s and 1940s.

For the present project, we completed US Forest Service forms for CCC Sites, and Intensive Survey forms for McCall Cabin, the Recreation Lots, and Bridal Veil Falls. These forms should be revised by the Forest Service as additional information concerning the structures becomes available. Nevertheless, they provide sufficient information for National Register evaluations

The Highlands Recreation Area was established in 1949 as a 737-acre tract to be "set apart and reserved for public recreation use and closed to all other occupancy and use except such uses as the Regional Forester may authorize as being consistent with recreation use" (Dedication on 1949 plat).

We recommend this Recreation Area eligible for the National Register of Historic Places as a district which possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. The Highlands Recreation Area Historic District is significant under National Register Criteria A (association with events that have made a significant contribution to the broad patterns of our history) and C (it represents a significant and distinguishable entity whose components may lack individual distinction).

Within the district are buildings, sites, structures, and objects that contribute to its significance. Elements that do not contribute are generally those that were originally constructed after 1949. The district includes three areas which themselves are considered historic districts: Van Hook Glade, Cliffside, and Dry Falls, as well as the complex of natural and constructed features at Bridal Veil Falls. It also includes the McCall Cabin, which cannot be finally evaluated until a planned reassembly is complete.

The section of US Highway 64 adjoining the Highlands Recreation Area is a contributing resource to the historic district.

As a result of this architectural reconnaissance, we offer four recommendations:

1. The resources identified in this study have been evaluated within the context of an appropriate APE, not as isolated structures. The resources must be evaluated in the context of an historic district, not as individual structures. These picnic shelters, rock walls, and other features must be evaluated in the context of their landscape and function as part of a larger recreation facility. This follows not only good practice, but also the specific requirements of the SHPO. It seems reasonable to use the historic 737-acre Highlands Recreation Area, which is a district eligible for listing in the National Register of Historic Places as this APE. A

several mile section of US 64 is incorporated in this proposed APE as its southern border.

2. The Forest Service should be proactive in complying with its Section 106 responsibilities. Because the entire 737-acre Highlands Recreation Area is considered the APE, proposals for any modifications of structures or alterations of the landscape must be submitted to the SHPO for comment. New construction such as a pedestrian bridge or new restroom facilities should be located in such a way as not to impact the landscape, viewshed, or historic resources.
3. To further the appropriate maintenance of these historic resources, it is essential that the Forest Service **immediately** develop maintenance plans and keep a file for each building, pathway, small-scale landscape element, or other feature. The inventory forms submitted with this report should become part of these files.
4. In the past maintenance has been haphazard and often lacks care and consideration of the historic significance of the properties. All future maintenance must meet the Secretary of Interiors Standards for Treatment of Historic Properties. There are standards for preservation, rehabilitation, restoration, and reconstruction. These Standards, revised in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 Federal Register (Vol. 60, No. 133).

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