



# United States Department of the Interior



## NATIONAL PARK SERVICE

Atlanta Federal Center  
1924 Building  
100 Alabama Street, SW  
Atlanta, GA 30303

IN REPLY REFER TO:

1.A.2. (SERO-CR)

The Honorable Patrick Pizzella  
Village of Pinehurst  
395 Magnolia Road  
Pinehurst, NC 28374

Dear Mayor Pizzella:

Thank you for your letter on behalf of the Village of Pinehurst Council regarding the North Carolina Department of Transportation's (NCDOT) proposed improvements to the Midland Road traffic circle from south of Pinehurst Manor Drive to Page Road, Moore County, North Carolina—NCDOT State Transportation Improvement Program (STIP) project U-5976. The National Park Service (NPS) understands that the Village of Pinehurst is concerned the proposed project will negatively alter the historic character of the Pinehurst National Historic Landmark (NHL) District.

Designed by landscape architect Warren Manning in the 1920s, Midland Road is an important part of Pinehurst's planned road system, a contributing structure to the Pinehurst NHL District. The Midland traffic circle, an approximately 6.5-acre traffic circle at the junction of Midland Road and US-501, is a prominent feature of one of the primary approaches to the Village. The Midland Road traffic circle is not part of Pinehurst's original road system as it was constructed in 1956 to address traffic concerns. Although the introduction of the Midland traffic circle compromised the integrity of Pinehurst's historic road system, it was constructed in a manner sympathetic to the district. As the Pinehurst NHL nomination states, "...its very design continued the theme of curves and circles that characterize Pinehurst's roadways..." (p. 66).

Even though the Midland Road traffic circle is not currently recognized as historic and is not categorized as a contributing resource to the NHL District, the Midland traffic circle *may* possess historic significance. Such a conclusion might be demonstrated via either preparation and official concurrence on a federal agency Determination of Eligibility (DOE) or, by preparation and approval of National Register documentation for that resource. That second option might assume the form of preparation of Additional Documentation to supplement the existing National Register-listed Pinehurst Historic District (listed 1973) to include the Midland Road traffic circle as a contributing resource and having that document approved by North Carolina's state review board and submitted by that agency to the Keeper of the Register for listing in the National Register of Historic Places. However, any considerations afforded by conferral of historic status upon the Midland Road traffic circle in light of proposed development would hinge upon the

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presence of a federal undertaking to trigger compliance with the National Historic Preservation Act (NHPA).

The NPS shares the Village's concern with how NCDOT U-5976 might affect the Pinehurst NHL District. However, it must be noted that our understanding from both the Federal Highway Administration and NCDOT is that the proposed project is state-funded and there is no federal involvement (e.g., licensing, funding, or permitting) that would necessitate consultation under Section 106 of the NHPA. As Section 106 consultation is not required, the NCDOT is not obligated to seek NPS opinion or concurrence on the project. As you may know, NCDOT discussed the Midland Road traffic circle project with NPS following a February 27, 2024, meeting concerning a different project in which NPS is a consulting party. At that time, NPS acknowledged that based on the information provided it had no formal review role or authority, but strongly urged that any proposed replacement should be carefully designed to avoid diminishing the historic integrity of the NHL district. NPS recommended that a redesigned intersection should be planned in an unobtrusive manner that considers the road system's historic curvilinear design and might possibly employ vegetation as a means to blend newly introduced elements with historic resources.

The NPS supports the Village of Pinehurst's ongoing efforts to preserve its community's historic character. If circumstances change with NCDOT U-5976 and a federal nexus were to be created, rest assured NPS would actively engage whatever federal agency were to step forward in that hypothetical scenario. If you have any questions about this letter, please feel free to contact architectural historian Ellen Rankin at (470) 587-7940 or [ellen\\_rankin@nps.gov](mailto:ellen_rankin@nps.gov).

Sincerely,

**JULIE  
ERNSTEIN**

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Julie H. Earnstein, Ph.D., RPA

Division Manager, Cultural Resources, Partnerships, and Science

cc: Ms. Mary Pope Furr, North Carolina Department of Transportation  
Ms. Renee Gledhill-Earley, North Carolina State Historic Preservation Office