

COMMONWEALTH of VIRGINIA

Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Stefanie K. Taillon Secretary of Natural and Historic Resources Julie V. Langan *Director*

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April 1, 2025

Raymond Ezell, RPA Virginia Department of Transportation, Environmental 87 Deacon Road Fredericksburg, VA 22405

Re: VDOT Project: I-66 Bridge Replacement Over Broad Run

Project Number: 0066-030-543, B632, P101, R201 (UPC: 120814)

Fauquier County Structure No.: 2053

Locality: Fauquier & Prince William counties

Federal Funding

Action Required: Effect Determination

VDHR File: 2023-0072

Dear Mr. Ezell:

On January 21, 2025, the Department of Historic Resources (DHR) received through email a coordination letter from the Virginia Department of Transportation (VDOT) requesting review and comment for the above-referenced project (the Project, the Bridge). DHR understands VDOT proposes to replace the Interstate-66 bridge (Structure No.: 2053, the Bridge) carrying the eastbound (EB) and westbound (WB) lanes over Broad Run, a creek that lies between Fauquier and Prince William counties. On behalf of the Federal Highway Administration (FHWA), VDOT is coordinating the above referenced federally funded project with DHR and other consulting parties in accordance with Section 106 of the National Historic Preservation Act (NHPA, 1966 as amended), and implementing regulations 36 CFR 800.

Through March 14, 2025, VDOT has included DHR in correspondences with consulting parties who have expressed their concern about the project's effects on adjacent historic properties. DHR appreciates the time and effort VDOT has taken to seek answers to the numerous questions regarding the Project. Given that there has been a lot of detailed information shared over the last few weeks between several stakeholders, DHR believes it is prudent to request VDOT to share one letter that concisely consolidates the information shared to date. While VDOT has made an effort to answer questions, there are still some points where clarity is needed to fully understand the potential effects of the Project on historic resources.

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One of the historic properties of concern is the Beverley Mill/Chapman Mill (DHR ID #076-002) (The Mill), which is listed in the National Register of Historic Places (NRHP) and the Virginia Landmarks Register (VLR). Its NRHP boundary is less than 200 feet from the current bridge and the planned expansion of the width of the Bridge would decrease this distance.

In order to assess the effects of the proposed bridge replacement/widening, DHR recommends that VDOT complete a visual effects assessment for effects to the Beverley Mill/Chapman Mill. The assessment should include a clear representation of the visual relationships between the extant Bridge, proposed Bridge, and The Mill; clarification regarding the extant Bridge's closest point to The Mill and how many more feet the planned Bridge will extend toward The Mill; and details regarding the proposed bridge height and its comparison to the existing. DHR recommends providing a photo simulation or other method of depicting the extent of the proposed Bridge from various locations within the Mill NRHP boundaries. The effects assessment should include views looking towards the Bridge from an eye level perspective.

Additionally, as the widening will require fill of the earthen approaches to the bridge on the north side of I-66, DHR requests a clearer understanding of how much existing vegetation will be removed by the Undertaking and the visual impacts of the loss of this vegetation on the Mill property.

Most of the questions that stakeholders and DHR have revolve around the drawings submitted of the proposed Bridge dated October 21, 2024. In short, DHR needs clarity from VDOT regarding the total width of the extant Bridge and the total width of the proposed Bridge at their widest points; please provide an overlay of the proposed bridge design on the existing bridge aerial.

Finally, DHR has additional questions regarding the proposed methodology for the construction of the bridge and the need to widen the bridge for the purposes of construction. Specifically:

- What construction activities will produce vibrations that will be measurable at The Mill site?
- There are inconsistencies in the construction description and plans, will there be new holes dug for supporting members? The plans appear to indicate a structure resembling posts at the central axis of the Bridge; are these existing supports that will remain or proposed new supports that will require drilling or blasting to install?
- What other alternatives have been considered to reduce further incursion into The Mill's historic setting? VDOT has indicated that the Bridge must be widened for traffic flow during construction purposes, are there other mechanisms to meet this need without widening the bridge towards the Mill, such as a temporary reduction of travel lanes during construction?

DHR would be willing to have an on-site meeting with VDOT that may assist in answering some of the questions/requests above. Access to the Beverley Mill/Chapman Mill property would be needed as part of any on-site meeting to address the above questions regarding visual effects to the Mill.

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If you have any questions or comments regarding the Project, please do not hesitate to contact me via email at sherry.teal@dhr.virginia.gov or via telephone at (804) 482-6090.

Sincerely,

Sherry Teal, Architectural Historian Review and Compliance Division

> M/eal

cc: Justin Patton, Prince William County

cc: Wendy Wheatcraft, Fauquier County

cc: Michael Kieffer, Bull Run Mountain Conservancy

cc: Eric Allard, Turn the Mill Around Campaign

cc: Linda Wright, Buckland Preservation Society

cc: Kevin Kask, Piedmont Environmental Council

cc: Earl Douple, Chair, Turn the Mill Around Campaign

cc: John Browne, Secretary, Buckland Preservation Society

cc: Eric Griffitts, Principal Planner/Heritage Resources Specialist

cc: John McCarthy, Piedmont Environmental Council