



February 21, 2025

Raymond Ezell
District Archaeologist
Virginia Department of Transportation
87 Dacon Road
Fredericksburg, VA 22405

Via email: Raymond.ezell@VDOT.virginia.gov

Re: VDOT Project: I-66 EB & WB Bridge Replacement over Broad Run
Project Number: 0066-030-543, B632, P101, R201 (UPC: 120814)
Fauquier County Structure No.: 2053
VDHR File: 2023-0072

Dear Mr. Ezell:

Thank you for including Prince William County (PWC) in the consultation process under Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, for the I-66 Bridge Replacement over Broad Run. We offer these comments on your January 21, 2025, letter to the Virginia Department of Historic Resources (VDHR). Prince William County concurs that the undertaking may result in possible effects to both architecture and archaeological resources. However, before we provide any concurrence on the nature of those effects, we request more information on the following matters.

AREA OF POTENTIAL EFFECT (APE). The Virginia Department of Transportation (VDOT) has determined the APE to include parcels adjacent to the bridge location as being sufficient to cover any possible visual impacts. However, VDOT has not provided corresponding evidence to support that only properties adjacent to the bridge location will have visual impacts. We recommend VDOT consider preparing a visual impact assessment to eliminate potential consideration that viewshed impacts may extend beyond to adjacent parcels. For direct effects, VDOT has only included the immediate footprint of the bridge. Areas for construction staging locations should also be considered part of the APE for direct effects. We request VDOT provide more information regarding construction staging and include those areas as of the APE for consideration of direct effects. We also concur with Fauquier County's comments addressed in their February 5, 2025, letter stating the need to consider noise and vibration as consideration defining both the APE and for evaluating adverse effects.

IDENTIFICATION OF POTENTIAL CUMULATIVE EFFECTS. A better understanding of potential cumulative impacts should be part of the evaluation of potential adverse effects. While we understand that VDOT will not acquire additional right-of-way, VDOT has not provided sufficient analysis if the undertaking might potentially allow for future expansion within the existing right-of-way. If the new bridge allows for added capacity, VDOT should provide an understanding of potential impacts that might result if future improvements are made to add capacity to I-66, even if VDOT has no plans at the current time to address additional capacity.

We look forward to working with VDOT, VDHR, and all the consultant parties that are part of the Broad Run bridge replacement project. If you have any questions regarding this review, please contact Eric Griffiths, Heritage Resources Specialist, at 703-792-4544 or via email at egriffitts@pwcgov.org

Sincerely,

Tanya Washington

Tanya M. Washington
Director of Planning

cc: Christopher Shorter, County Executive, PWC
Wade Hugh, Deputy County Executive, PWC
Eric Griffiths, Heritage Resources Specialist, Planning Office, PWC
Justin Patton, County Archaeologist, Planning Office, PWC
Tony Alston, Assistant Planning Director, Long Range, PWC
Sherry Teal, Virginia Department of Historic Resources (VDHR)
Wendy Wheatcraft, Fauquier County
Michael Kieffer, Bull Run Mountain Conservancy
Eric Allard, Turn the Mill Around Campaign
Linda Wright, Buckland Preservation Society
Kevin Kask, Piedmont Environmental Council

