



COMMONWEALTH of VIRGINIA

Department of Historic Resources

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September 11, 2017

Mr. Richard B. Gangle
Dominion Resources Services, Inc.
5000 Dominion Boulevard
Glen Allen, Virginia 23060

Re: *Phase I Historic Architectural Survey of the Atlantic Coast Pipeline Project, Virginia Assessment of Effects Report (July 2017)*
DHR File No. 2014-0710

Dear Mr. Gangle:

The Department of Historic Resources (DHR) has received for our review and comment the report referenced above prepared by ERM for Atlantic Coast Pipeline, Inc. The report evaluates the potential impact of the pipeline on fifty-eight (58) above ground properties previously identified pursuant to Section 106 of the National Historic Preservation Act and determined to be listed in, eligible for, or potentially eligible for listing in the National Register of Historic Places (NRHP). The effects assessment evaluates impacts along the 308.1-mile long corridor which traverses the Virginia jurisdictions of Highland, Bath, Augusta, Nelson, Buckingham, Cumberland, Prince Edward, Nottoway, Dinwiddie, Brunswick, Greensville, and Southampton counties; as well as the independent municipalities of Suffolk and Chesapeake.

The consultant recommends that the Atlantic Coast Pipeline project will not adversely affect any of the fifty-eight (58) historic properties evaluated in the report. Although we agree that many of the properties within the undertaking's Area of Potential Effects (APE) will not be adversely affected, we cannot agree that this is true for all of them. We concur that the Atlantic Coast Pipeline project will not adversely affect the following historic properties:

007-0103	007-5513	014-5062	062-0092	073-5014
007-0272	007-5530	014-5066	062-0117	087-5505
007-0442	007-5542	014-5074	062-0006/ 062-5119-0002	133-0101
007-0447	007-5689	131-5325	062-5119-0113	133-0105
007-0463	045-0120	024-5006	062-5121	133-5039
007-0476	008-0126	026-0007	062-5180	133-5391
007-0487	014-5059	026-5222	004-5013	133-5482
007-0863	014-5060	045-0007	024-0416	133-5492
007-5210				

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The pipeline corridor either avoids these properties altogether and, therefore, will only have a visual impact upon the resource that does not diminish any of its significant character-defining features which make it eligible for listing in the NRHP, or cross into the historic property boundary minimally and in a manner (e.g. through open fields requiring no tree removal) that, again, does not diminish those characteristics which make the property NRHP eligible.

The DHR also agrees that the undertaking will not adversely affect the following properties, but our concurrence requires a certain amount of elaboration:

- **007-0015**: The Folly Farm, constructed in 1818, is listed in the NRHP under Criterion C for its architectural merit and number of agricultural dependencies. Although the pipeline will bisect the property and require the removal of mature trees, thereby altering somewhat the appearance of the existing landscape, the property does not primarily derive its significance from its setting, but from those qualities that define its architectural style (design, workmanship, and materials). These characteristics of integrity will not be affected by the undertaking.
- **008-5053**: This Craftsman-style Bungalow was constructed in c.1930 and is eligible for listing in the NRHP under Criterion C for its architectural merit. Although the pipeline corridor will clip the northeast corner of the historic dwelling's NRHP boundary and require some tree clearing, the altered landscape will not be visible from the primary resource due to distance, topography, and intervening vegetative clearing. As with Folly Farm, the chief characteristics which define 008-5053's significance architecturally will not be impacted by the pipeline construction.
- **131-0035**: DHR believes that the Dismal Swamp Canal Historic District, which is listed in the NRHP, will not be adversely affected by the undertaking as an architectural property. However, because the pipeline will be constructed across the Dismal Swamp Canal in an open cut there is the possibility of impacting archaeological sites associated with it. Additional comments from DHR regarding the effect to the Dismal Swamp Canal Historic District will be addressed in our review of the report for archaeological survey conducted in this vicinity.
- **123-0084**: DHR believes that the Upper Appomattox Canal, which is eligible for listing in the NRHP in the context of Technology/Engineering and Transportation/Communication, will not be adversely affected by the undertaking as an architectural property. However, because the pipeline will be constructed across the Appomattox River in an open cut there is the possibility of impacting archaeological sites associated with the canal. Additional comments from DHR regarding the effect to the Upper Appomattox Canal will be addressed in our review of the report for archaeological survey conducted in this vicinity.
- **091-5098**: DHR believes that the AM&O Railroad/Norfolk & Petersburg Railroad, which is eligible for listing in the NRHP under Criteria A, B, and C, will not be adversely affected by the undertaking as an architectural property. However, because the pipeline will be directionally drilled under the railroad bed there is the possibility of impacting archaeological sites associated with the AM&O Railroad/Norfolk & Petersburg Railroad. Additional comments from DHR regarding the effect to the AM&O Railroad/Norfolk & Petersburg Railroad will be addressed in our review of the report for archaeological survey conducted in this vicinity.

DHR is unable to comment on the potential effect of the undertaking on the following properties: **007-5554, 007-5583, 007-5585, 087-5610, 087-5618, 133-0025, and 133-5498**. All of these properties were inaccessible to the consultant and were not visible for the public right of way. Per DHR's recommendation they were all considered NRHP-eligible for Section 106 purposes. The pipeline will cross the boundary of

each property, thereby impacting the resource in some fashion. However, without knowing why these buildings are historically significant, if indeed they are, it is impossible to accurately evaluate the effect that the undertaking will have on them. We request that once access to these properties is granted that Atlantic Coast Pipeline, Inc. re-initiate consultation with DHR in order to definitively determine NRHP-eligibility for each and, for those found eligible, assess effect.

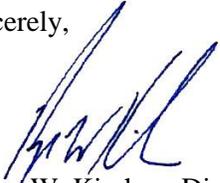
DHR will withhold at this time comment on the potential effects to **021-5012** (Appalachian Trail) and **080-5161** (Blue Ridge Parkway). These historic resources, both eligible for listing in the NRHP, are under federal jurisdiction of the United States Forest Service (USFS) and the National Park Service (NPS), respectively. Both the USFS and NPS have their individual Section 106 responsibilities to consult with DHR on the issuance of land-use permits for the Atlantic Coast Pipeline. Once such consultation commences, DHR will copy Atlantic Coast Pipeline, Inc. on our comments to USFS and NPS.

The DHR believes that the pipeline project will adversely affect the following historic properties:

- **008-0011:** Wilderness Farm, constructed in 1797, is eligible for listing in the NRHP under Criterion A for agriculture and Criterion C as a fine example of Georgian and vernacular architecture. The pipeline corridor will bisect the Wilderness Farm property and require the construction of an associated access road, necessitating the removal of mature trees on the property and burying the facility as it crosses open agricultural fields. The cleared areas will be visible in places from the main house. Because the property derives some of its historic significance from its agricultural setting and feeling, the construction of the pipeline and associated access road through the resource's boundary and in a manner that will be visible from the primary and secondary structures, DHR considers the diminishment to these characteristics to be adverse.
- **062-5119:** The South Rockfish Valley Rural Historic District is listed in the NRHP. As described in the current report, "It retains a high degree of integrity for a traditional, rural landscape in the Virginia Piedmont" (page 107). This "traditional, rural landscape" is a significant characteristic of the historic district. The pipeline corridor will cross the South Rockfish Valley Rural Historic District through open agricultural fields and stands of mature trees, which will greatly alter the rural setting and feeling of the historic district at the locations where this occurs. Because the South Rockfish Valley Rural Historic District derives much of its historic significance from its rural setting and feeling, the construction of the pipeline through the resource's boundary and in a manner that will be visible from contributing resources within the historic district, DHR considers the diminishment to these characteristics to be adverse.
- **062-5160:** The Warminster Rural Historic District is eligible for listing in the NRHP under Criterion A under the categories of settlement and development patterns, transportation development, Black Ethnic history, social history, and commerce; Criterion B for its association with the Cabell Family; and Criterion C for architecture. Similar to the South Rockfish Valley Rural Historic District above, the Warminster Rural Historic District is characterized by its current rural landscape and feeling. The pipeline corridor will cut through the rural historic district along its eastern and southern edges, which will require the removal of a swath of mature trees. Because the Warminster Rural Historic District derives much of its historic significance from its rural setting and feeling, the construction of the pipeline through the resource's boundary and in a manner that will be visible from contributing resources within the historic district, DHR considers the diminishment to these characteristics to be adverse.

Thank you for the opportunity to review this assessment. We understand that several consulting and interested parties may have concerns about the recommendations in this study and we request that ACP take into consideration those comments in the preparation of a final draft of this document. Please itemize in a cover letter to the final document the changes made based on these and other comments. If you have any questions about our review of this document, please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,



Roger W. Kirchen, Director
Review and Compliance Division