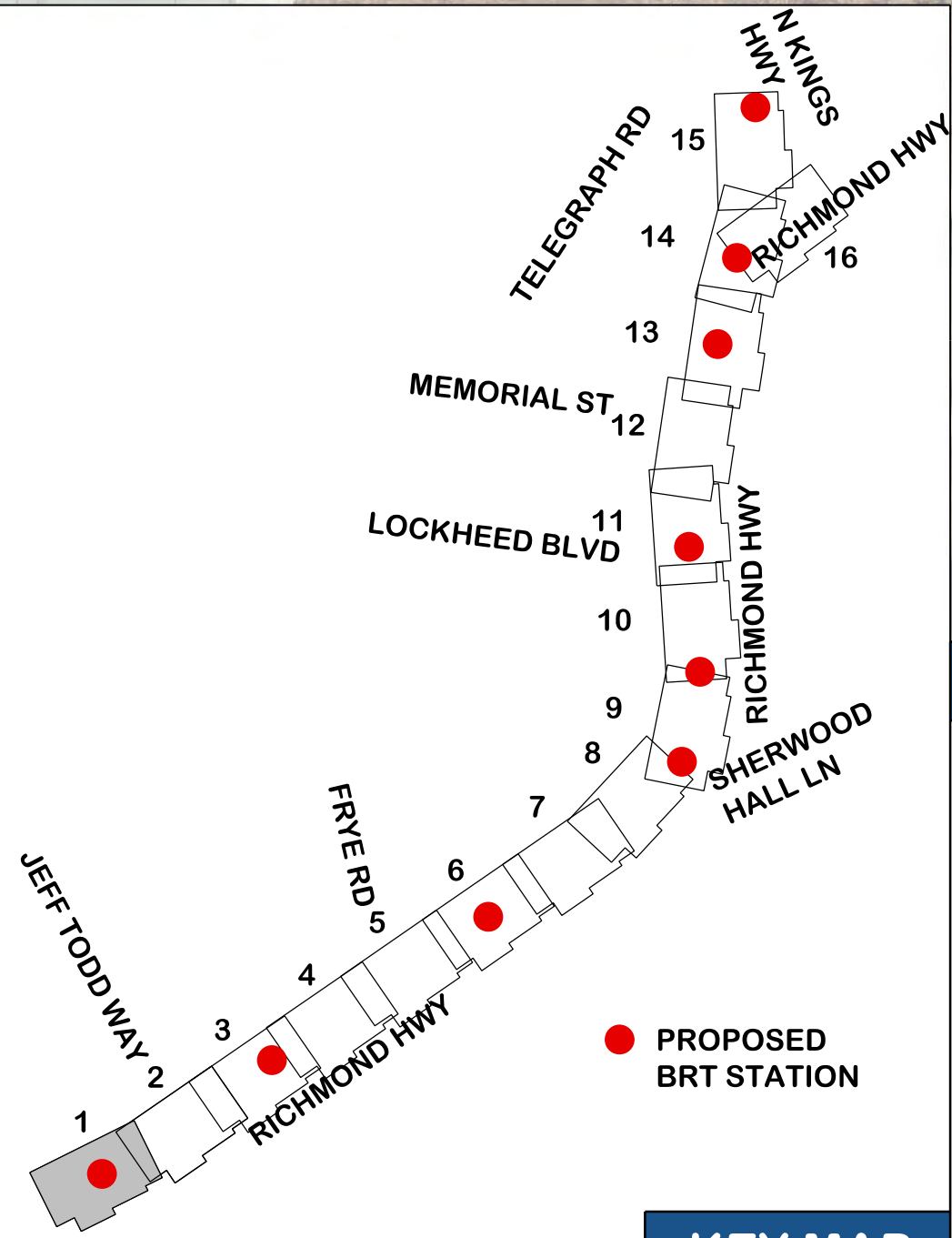
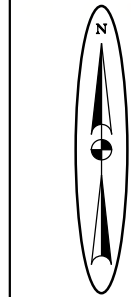


APPENDIX A: PROJECT MAP

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



KEY MAP

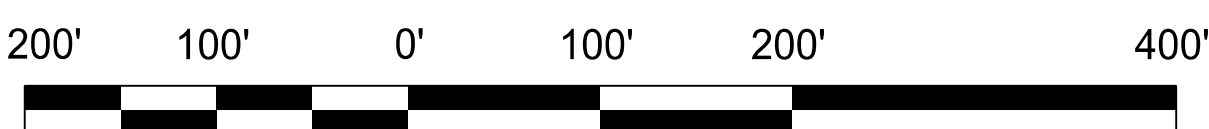
WORK IN PROGRESS: ALL ASPECTS OF THE DESIGN, INCLUDING THE LIMIT OF DISTURBANCE, PROPERTY IMPACTS, STORMWATER MANAGEMENT FACILITIES, AND SIDE STREET IMPROVEMENTS ARE PRELIMINARY AND ARE SUBJECT TO CHANGE.

LEGEND

- | | | |
|----------------------------------|-----------------|---|
| PRELIMINARY LIMIT OF DISTURBANCE | BRT PLATFORM | WATER RESOURCES |
| EXISTING PARCEL BOUNDARY | CONCRETE MEDIAN | WETLANDS |
| OTHER PROJECTS | ASPHALT | NRHP LISTED/ELIGIBLE HISTORIC PROPERTIES |
| PROPOSED RIGHT-OF-WAY | SIDEWALK | NEWLY IDENTIFIED; NRHP ELIGIBILITY UNDER REVIEW |
| PROPOSED GRADING LIMITS | CYCLE TRACK | PAVEMENT REMOVAL |
| DEDICATED TRANSITWAY | LANDSCAPED AREA | POTENTIAL STORMWATER MANAGEMENT AREAS |
| BRT IN MIXED TRAFFIC | EXISTING SIGNAL | POTENTIAL UNDERGROUND STORMWATER MANAGEMENT |

**THIS PLAN IS
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IS SUBJECT TO CHANGE**

GRAPHIC SCALE



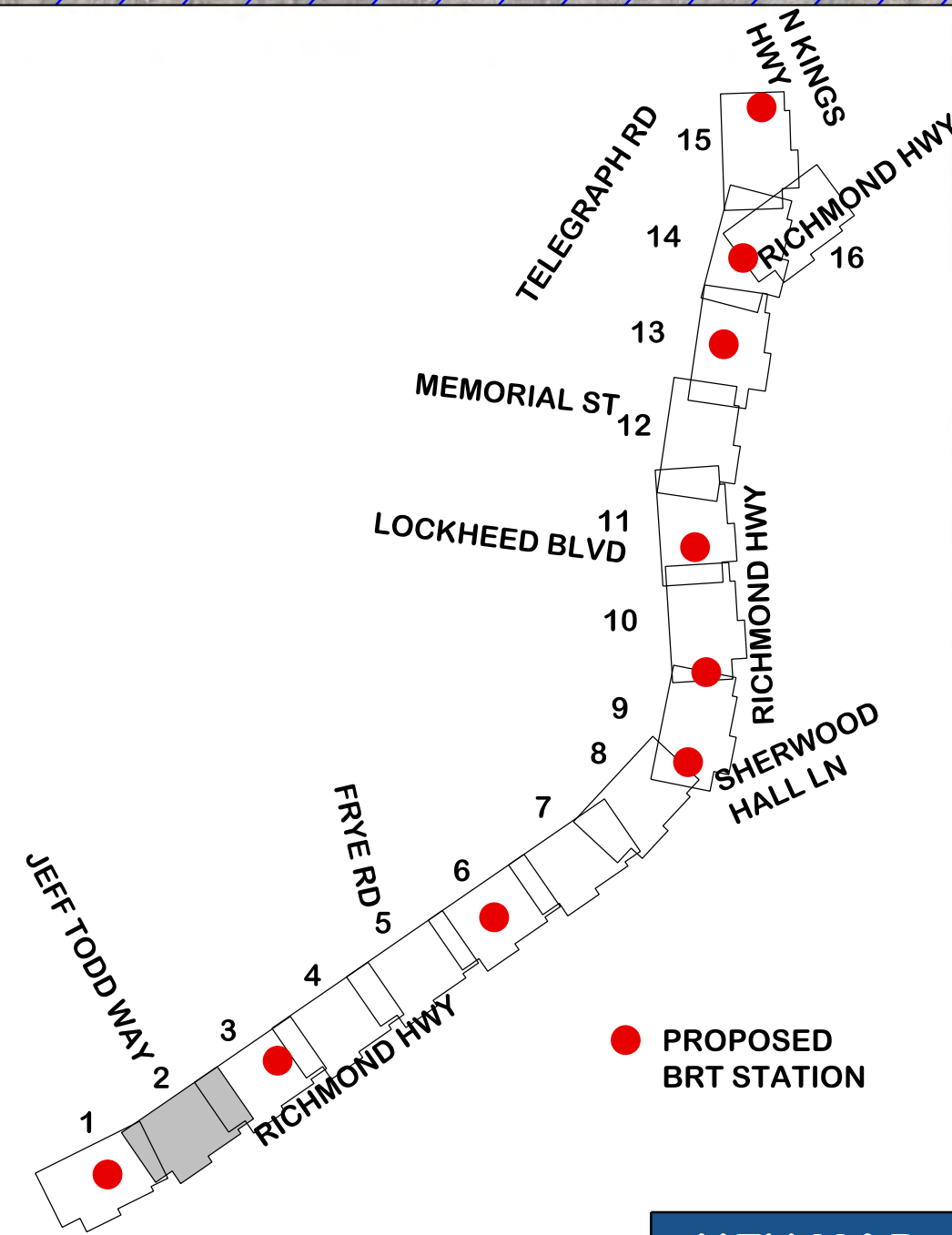
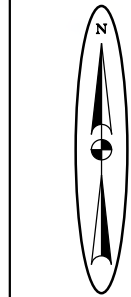
RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

March 2021

Sheet 1 of 16

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



KEY MAP

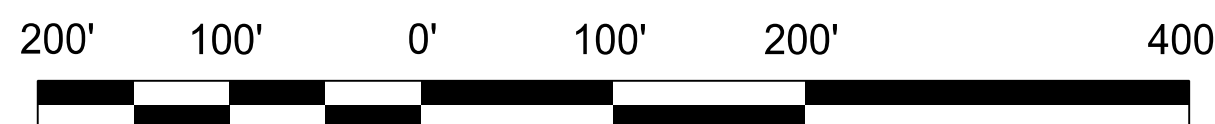
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GRAPHIC SCALE



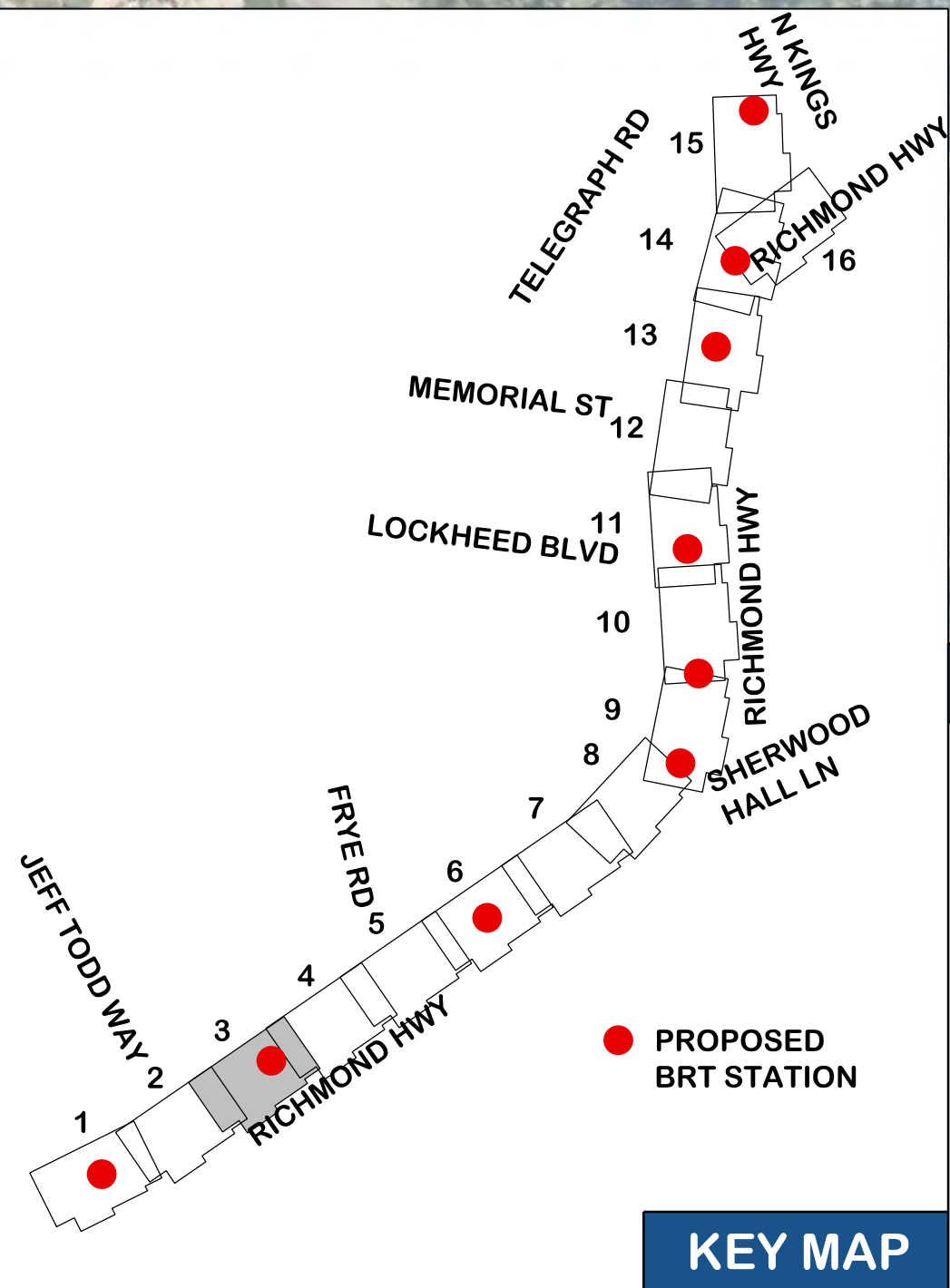
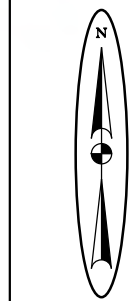
RICHMOND HIGHWAY
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CONCEPTUAL PLAN

March 2021

Sheet 2 of 16

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:

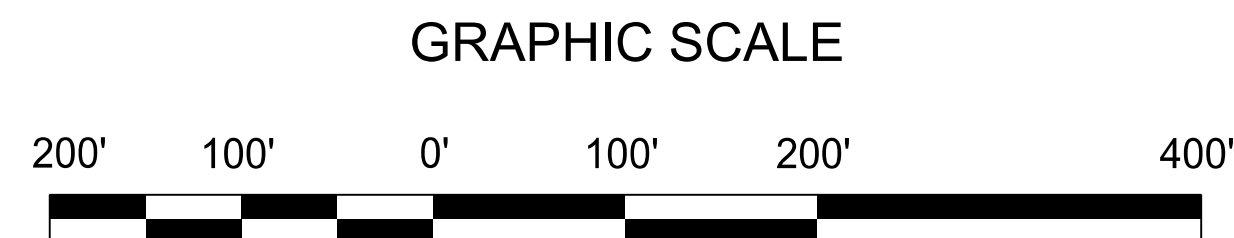


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LEGEND

	PRELIMINARY LIMIT OF DISTURBANCE		BRT PLATFORM		WATER RESOURCES
	EXISTING PARCEL BOUNDARY		CONCRETE MEDIAN		WETLANDS
	OTHER PROJECTS		ASPHALT		NRHP LISTED/ELIGIBLE HISTORIC PROPERTIES
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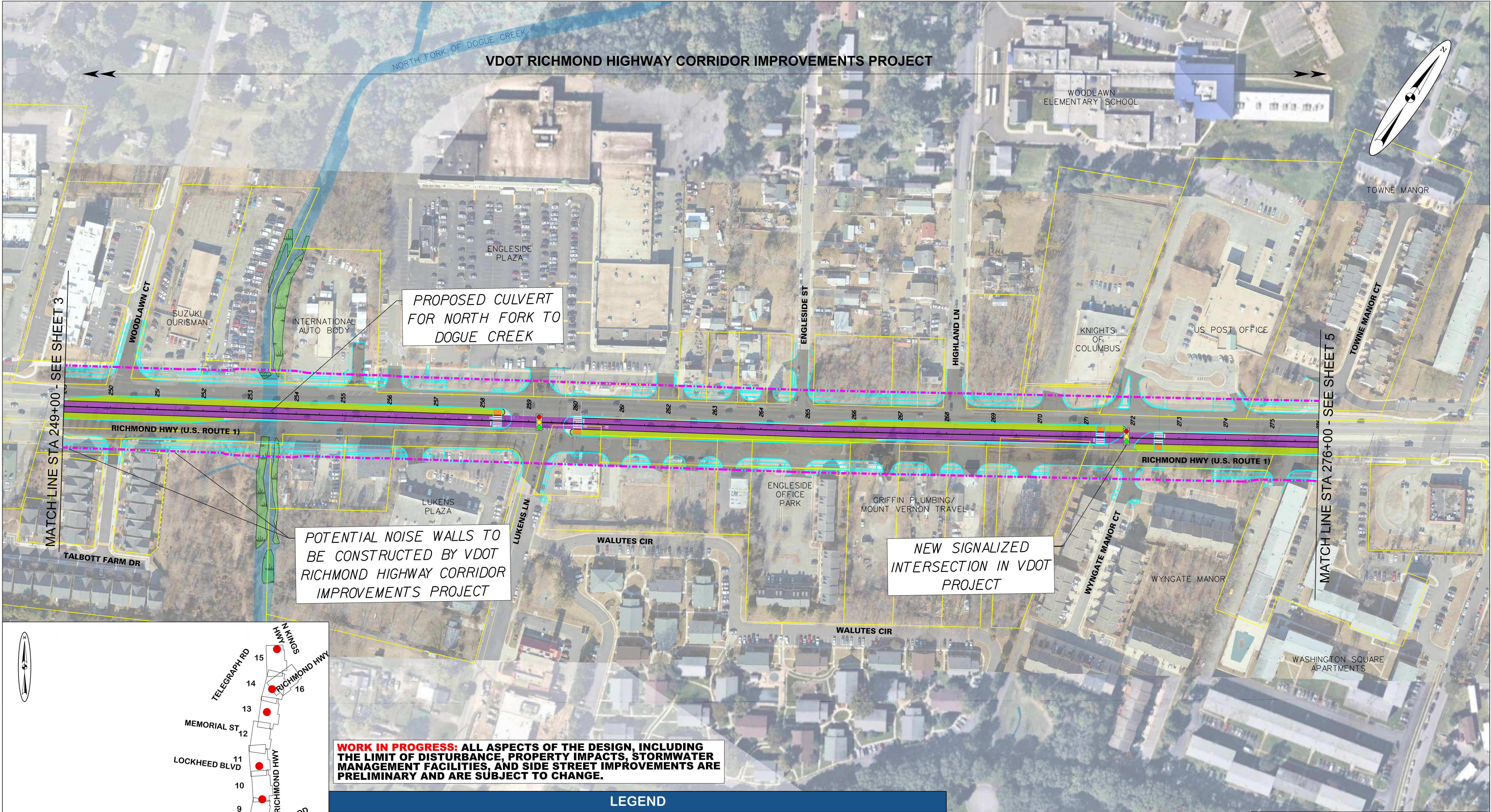


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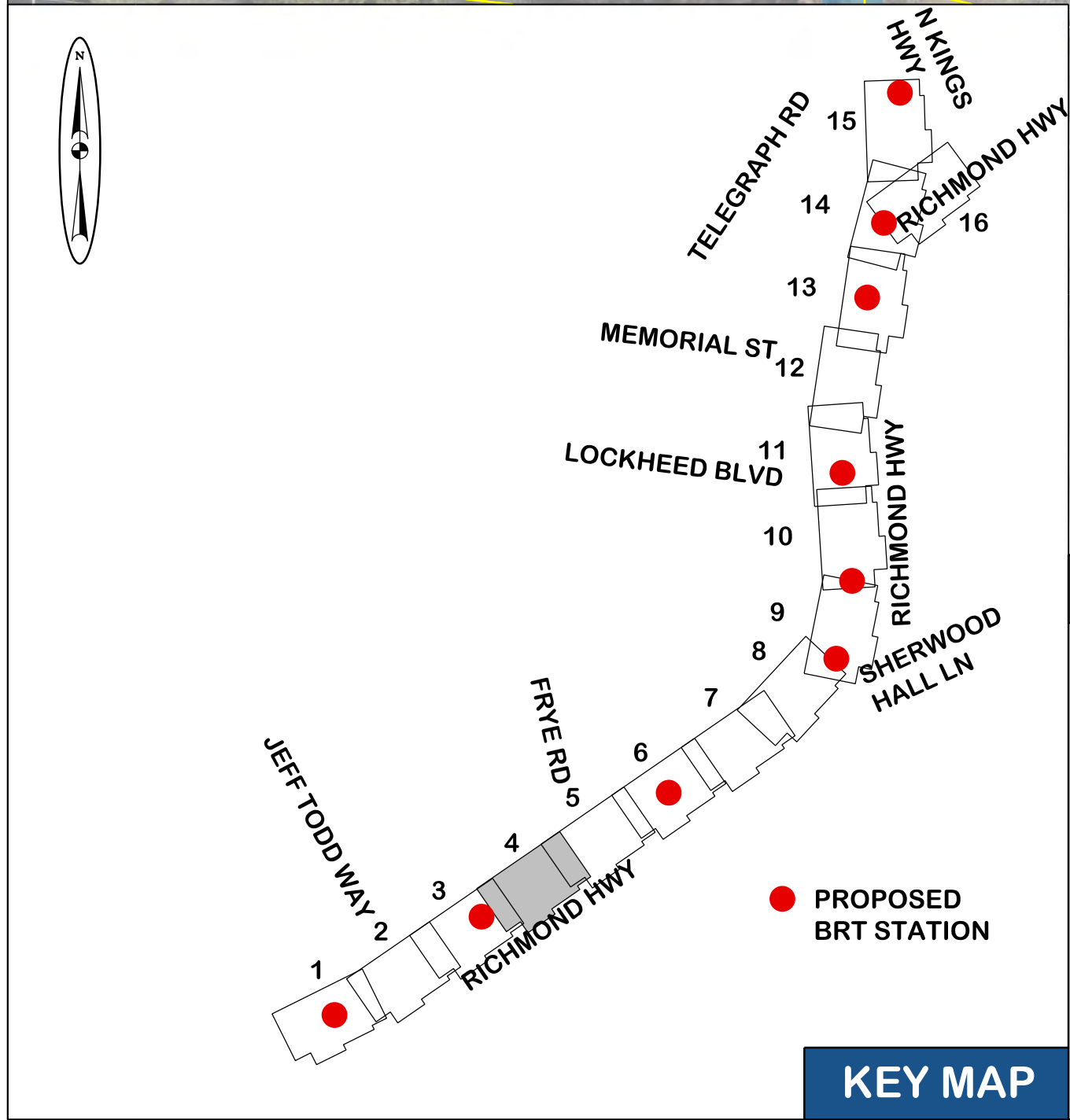
CONCEPTUAL PLAN

March 2021

Sheet 3 of 16



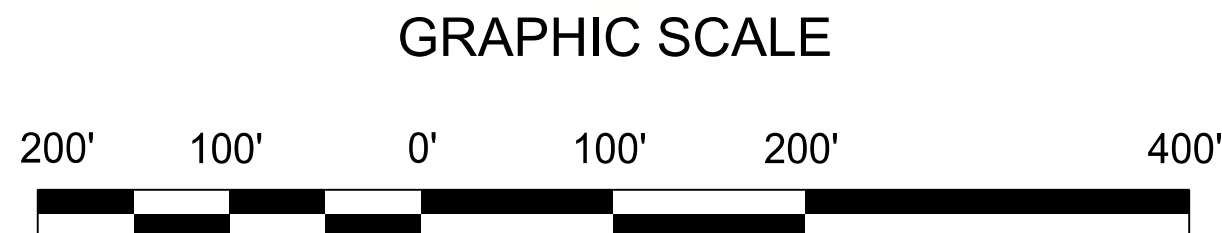
PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:





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POTENTIAL NOISE WALLS TO BE CONSTRUCTED
BY VDOT RICHMOND HIGHWAY CORRIDOR
IMPROVEMENTS PROJECT

LEGEND

- THIS PLAN IS
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IS SUBJECT TO CHANGE**

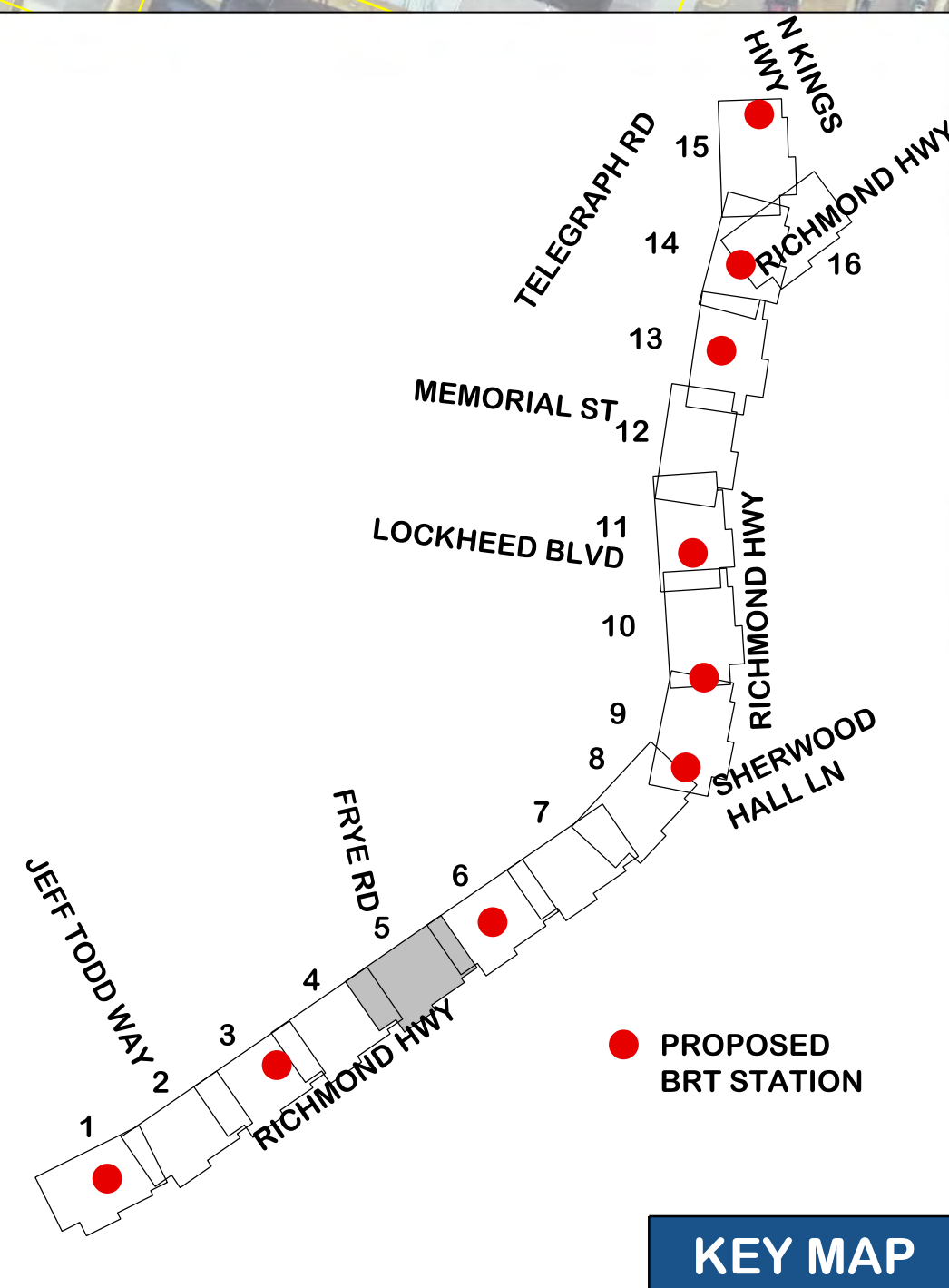
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CONCEPTUAL PLAN

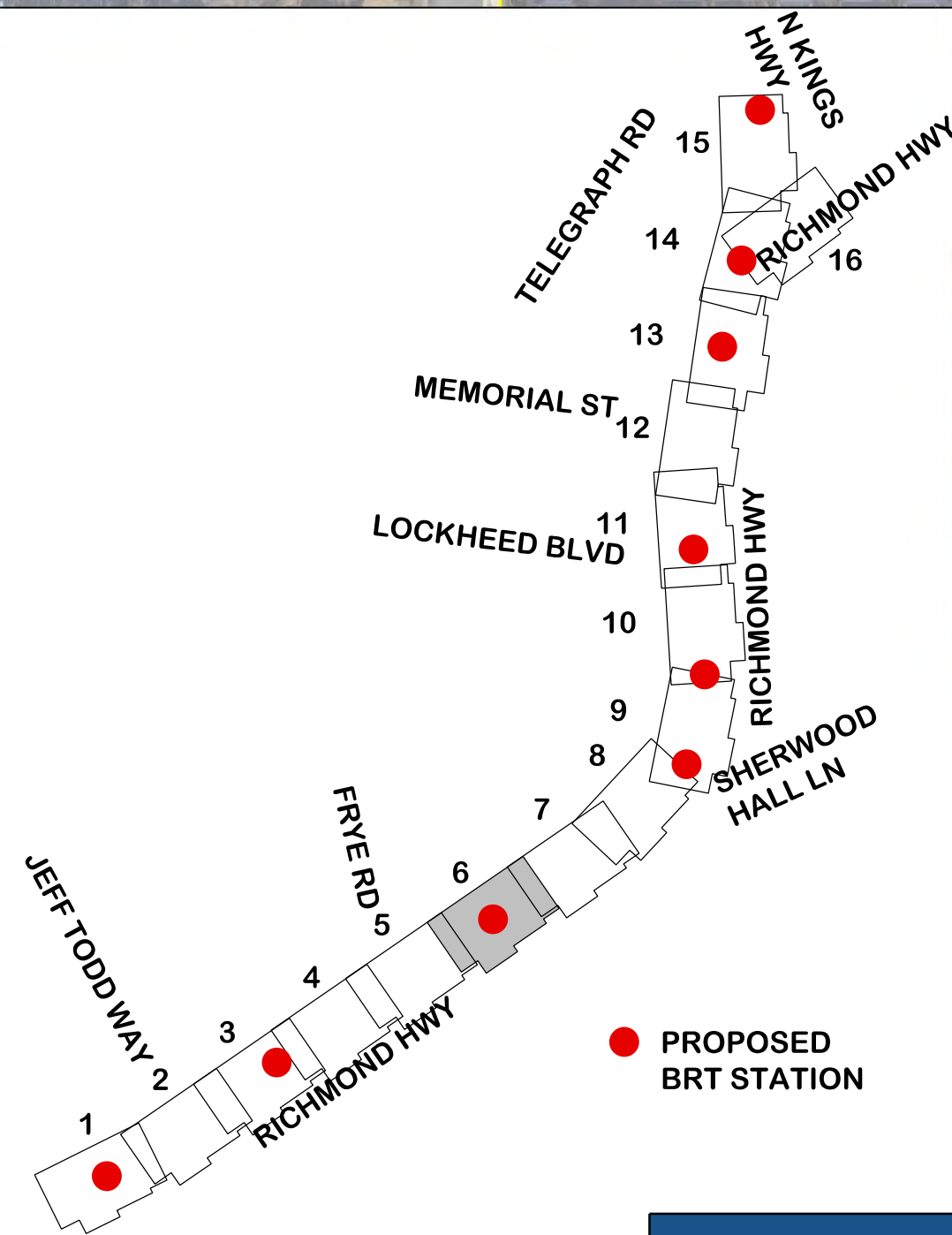
Sheet 5 of 16

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



KEY MAP

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



KEY MAP

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LEGEND

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GRAPHIC SCALE



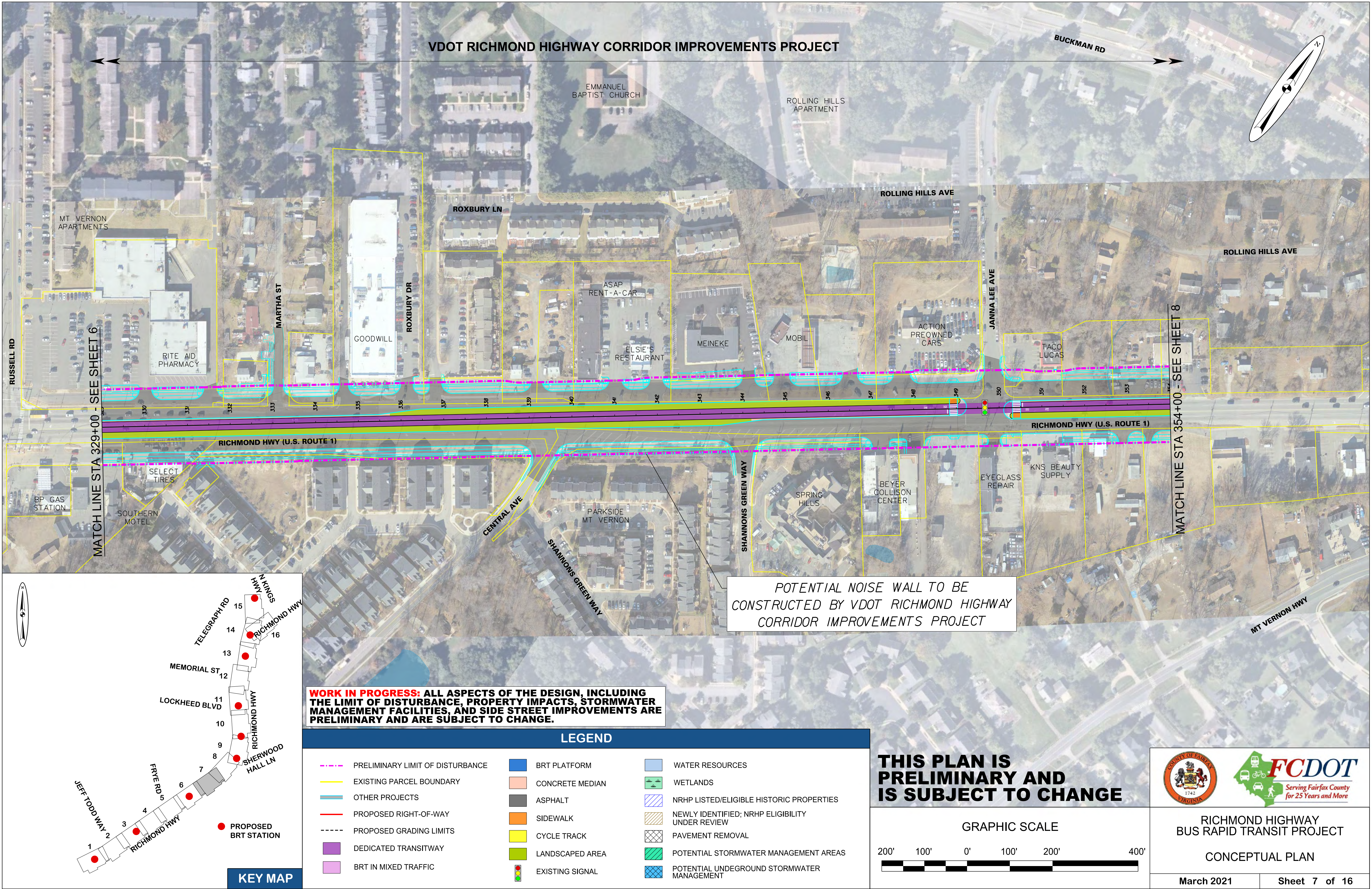
RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

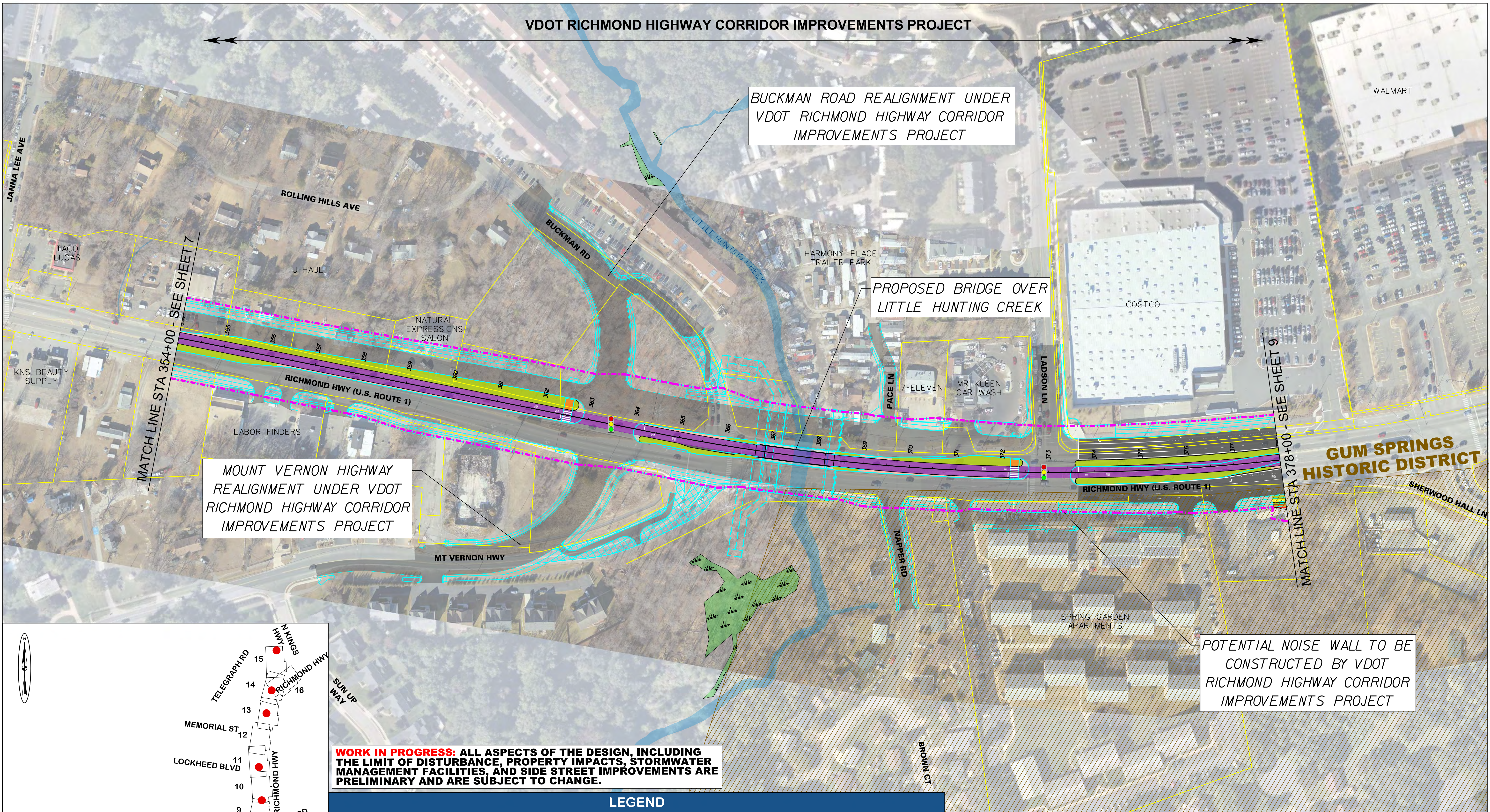
March 2021

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PROJECT MANAGER:
SURVEYED BY: DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



VDOT RICHMOND HIGHWAY CORRIDOR IMPROVEMENTS PROJECT



MOUNT VERNON HIGHWAY
REALIGNMENT UNDER VDOT
RICHMOND HIGHWAY CORRIDOR
IMPROVEMENTS PROJECT

BUCKMAN ROAD REALIGNMENT UNDER
VDOT RICHMOND HIGHWAY CORRIDOR
IMPROVEMENTS PROJECT

PROPOSED BRIDGE OVER
LITTLE HUNTING CREEK

POTENTIAL NOISE WALL TO BE
CONSTRUCTED BY VDOT
RICHMOND HIGHWAY CORRIDOR
IMPROVEMENTS PROJECT

**WORK IN PROGRESS: ALL ASPECTS OF THE DESIGN, INCLUDING
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LEGEND

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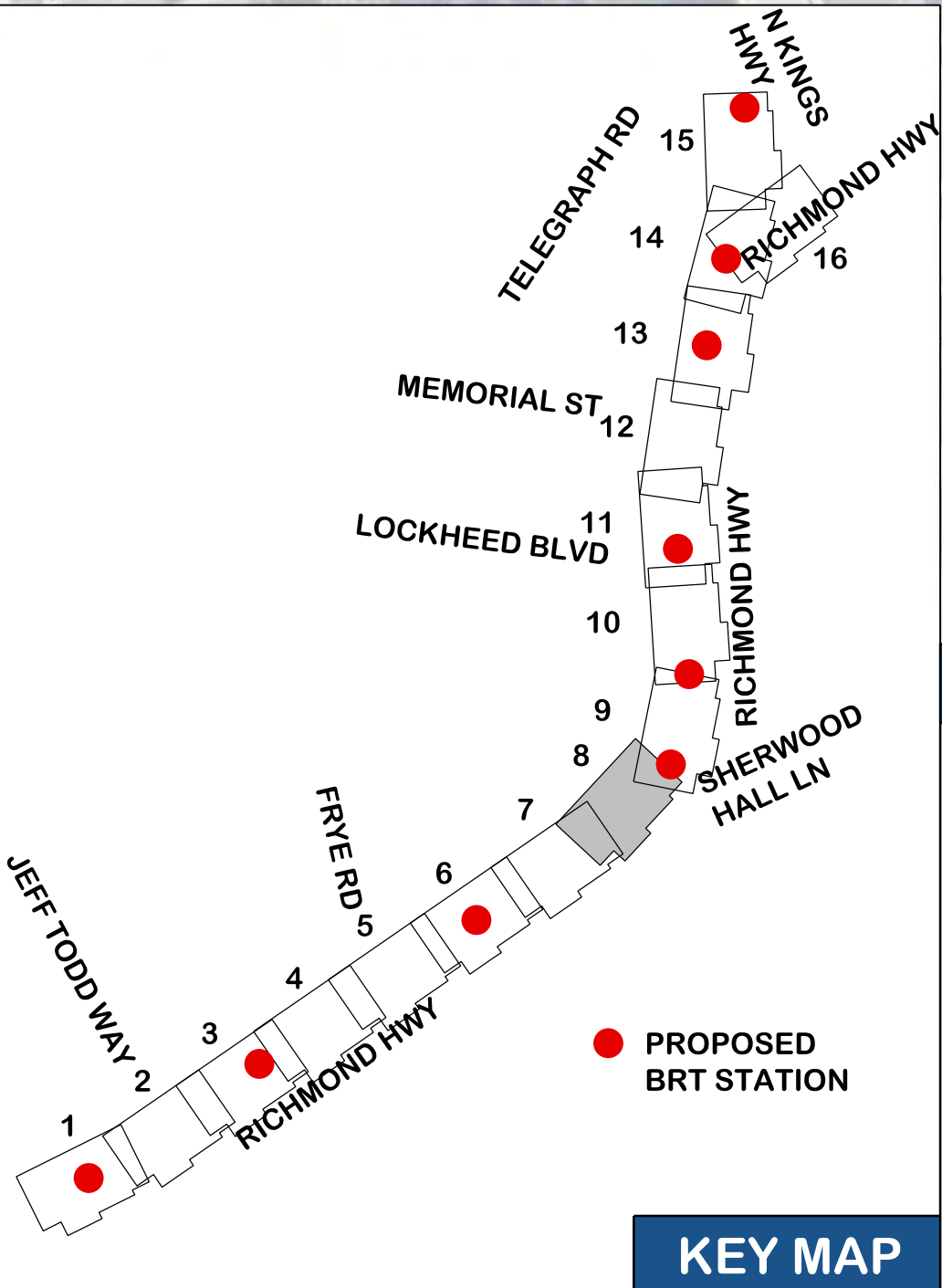
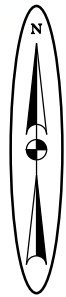
RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

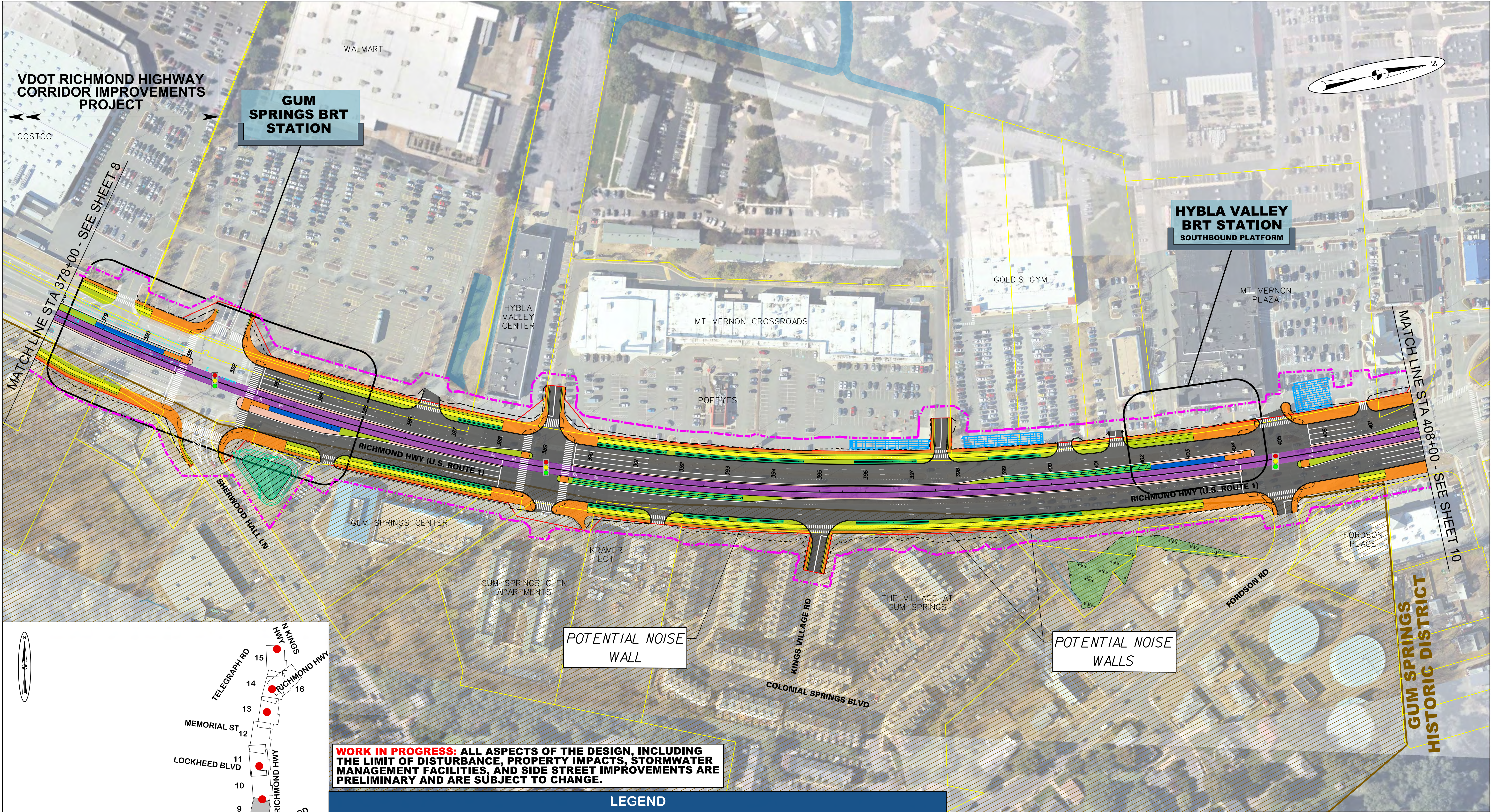
March 2021

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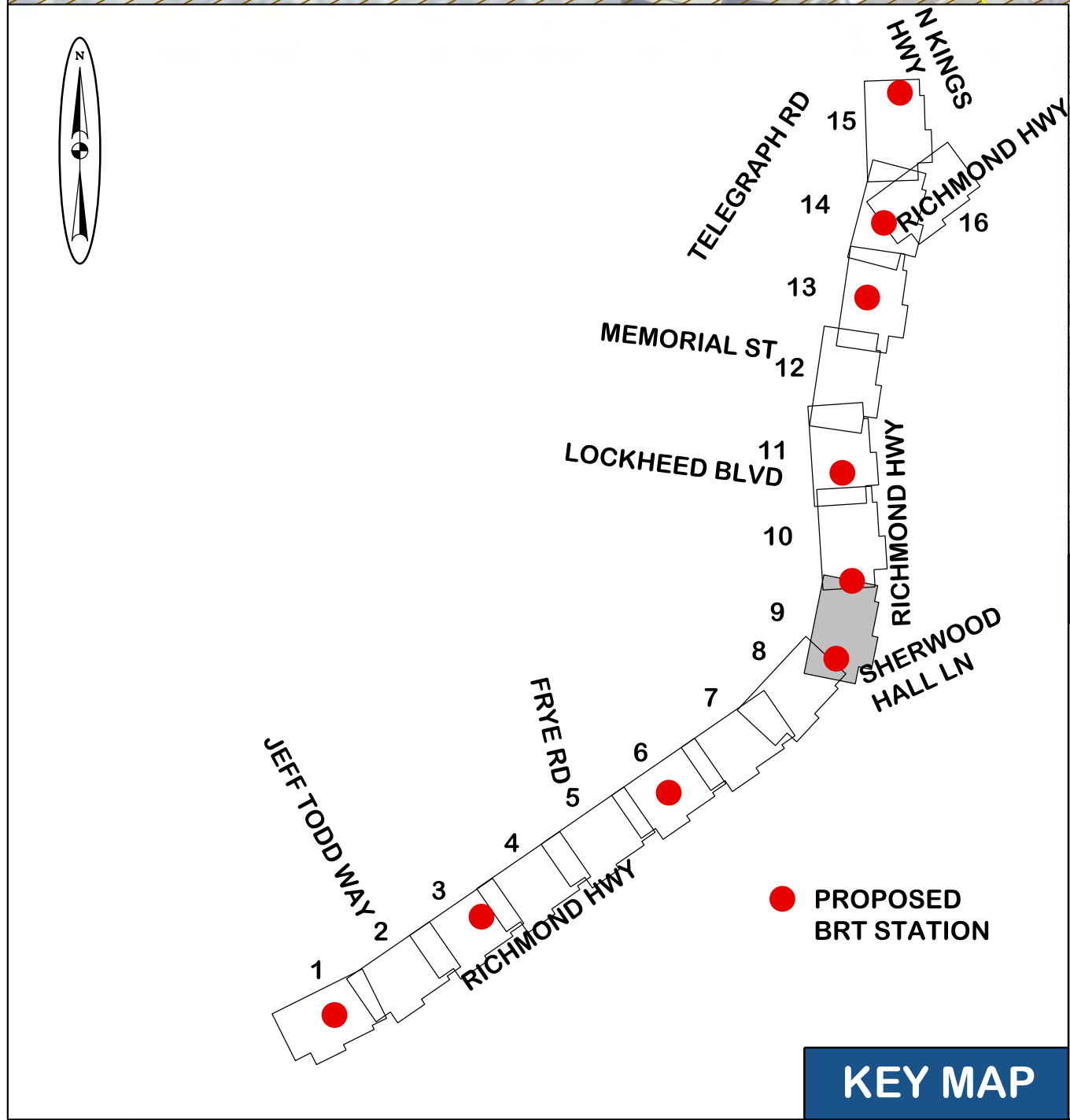
PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



KEY MAP



PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



WORK IN PROGRESS: ALL ASPECTS OF THE DESIGN, INCLUDING THE LIMIT OF DISTURBANCE, PROPERTY IMPACTS, STORMWATER MANAGEMENT FACILITIES, AND SIDE STREET IMPROVEMENTS ARE PRELIMINARY AND ARE SUBJECT TO CHANGE.

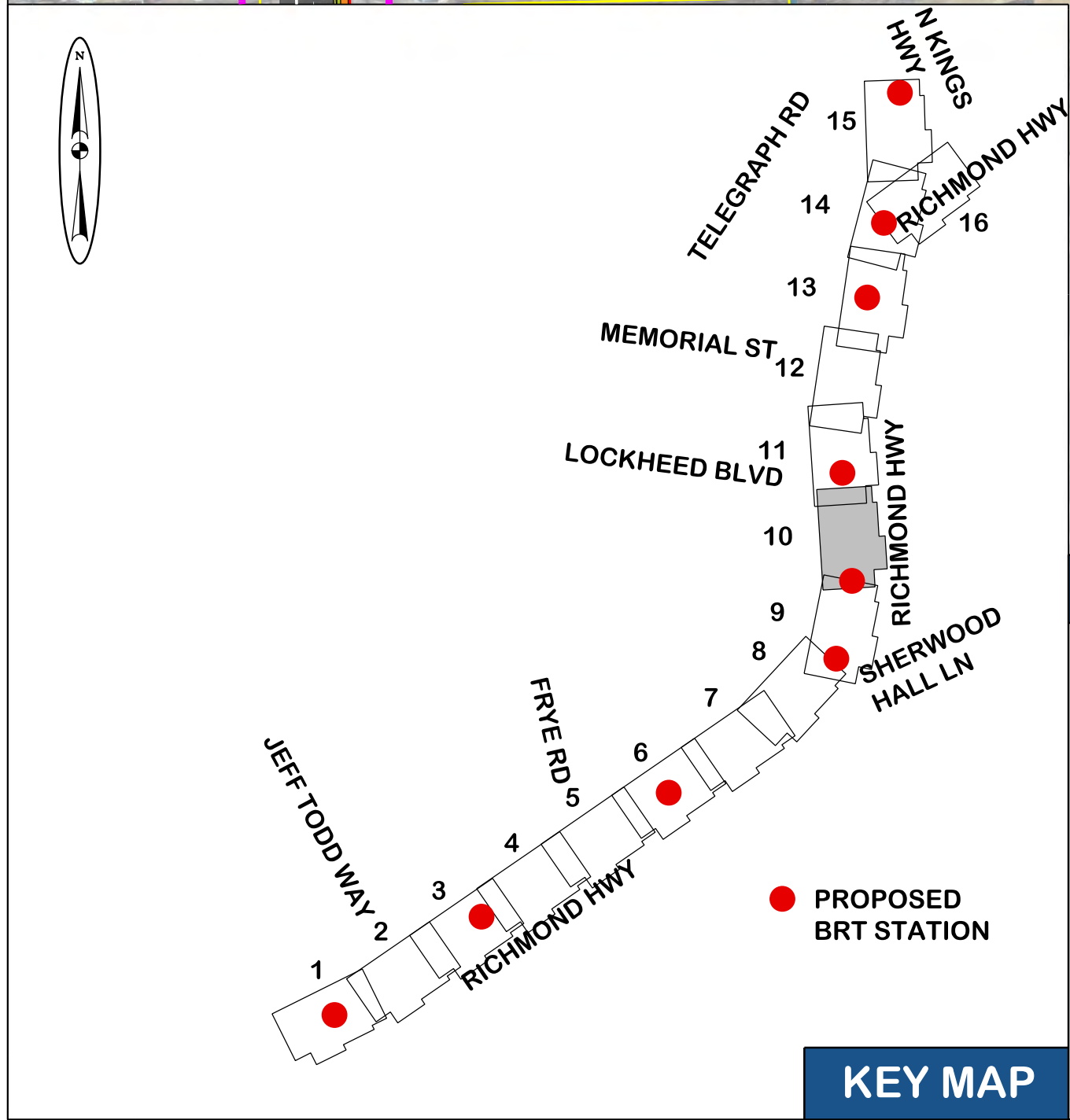
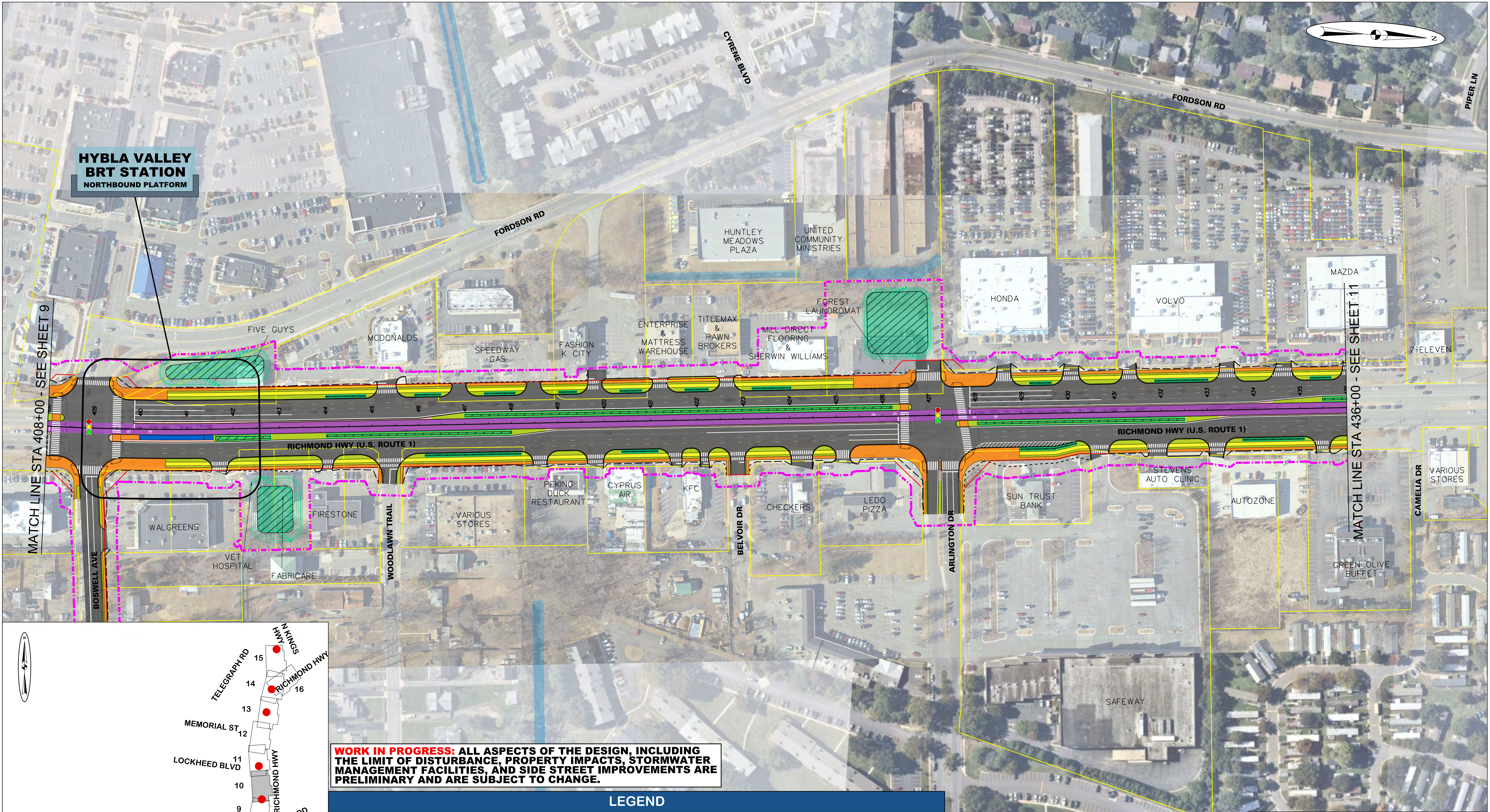
LEGEND					
	PRELIMINARY LIMIT OF DISTURBANCE		BRT PLATFORM		WATER RESOURCES
	EXISTING PARCEL BOUNDARY		CONCRETE MEDIAN		WETLANDS
	OTHER PROJECTS		ASPHALT		NRHP LISTED/ELIGIBLE HISTORIC PROPERTIES
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	PROPOSED GRADING LIMITS		CYCLE TRACK		PAVEMENT REMOVAL
	DEDICATED TRANSITWAY		LANDSCAPED AREA		POTENTIAL STORMWATER MANAGEMENT AREAS
	BRT IN MIXED TRAFFIC		EXISTING SIGNAL		POTENTIAL UNDERGROUND STORMWATER MANAGEMENT

THIS PLAN IS PRELIMINARY AND IS SUBJECT TO CHANGE

GRAPHIC SCALE

200' 100' 0' 100' 200' 400'

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



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LEGEND

PRELIMINARY LIMIT OF DISTURBANCE

EXISTING PARCEL BOUNDARY

OTHER PROJECTS

PROPOSED RIGHT-OF-WAY

PROPOSED GRADING LIMITS

DEDICATED TRANSITWAY

BRT IN MIXED TRAFFIC

BRT PLATFORM

CONCRETE MEDIAN

ASPHALT

SIDEWALK

CYCLE TRACK

LANDSCAPED AREA

EXISTING SIGNAL

WATER RESOURCES

WETLANDS

NRHP LISTED/ELIGIBLE HISTORIC PROPERTIES

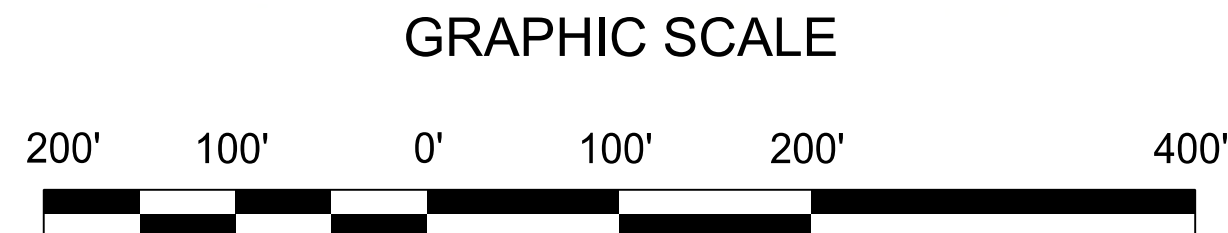
NEWLY IDENTIFIED; NRHP ELIGIBILITY UNDER REVIEW



PAVEMENT REMOVAL

POTENTIAL STORMWATER MANAGEMENT AREAS

POTENTIAL UNDERGROUND STORMWATER MANAGEMENT

THIS PLAN IS PRELIMINARY AND IS SUBJECT TO CHANGE





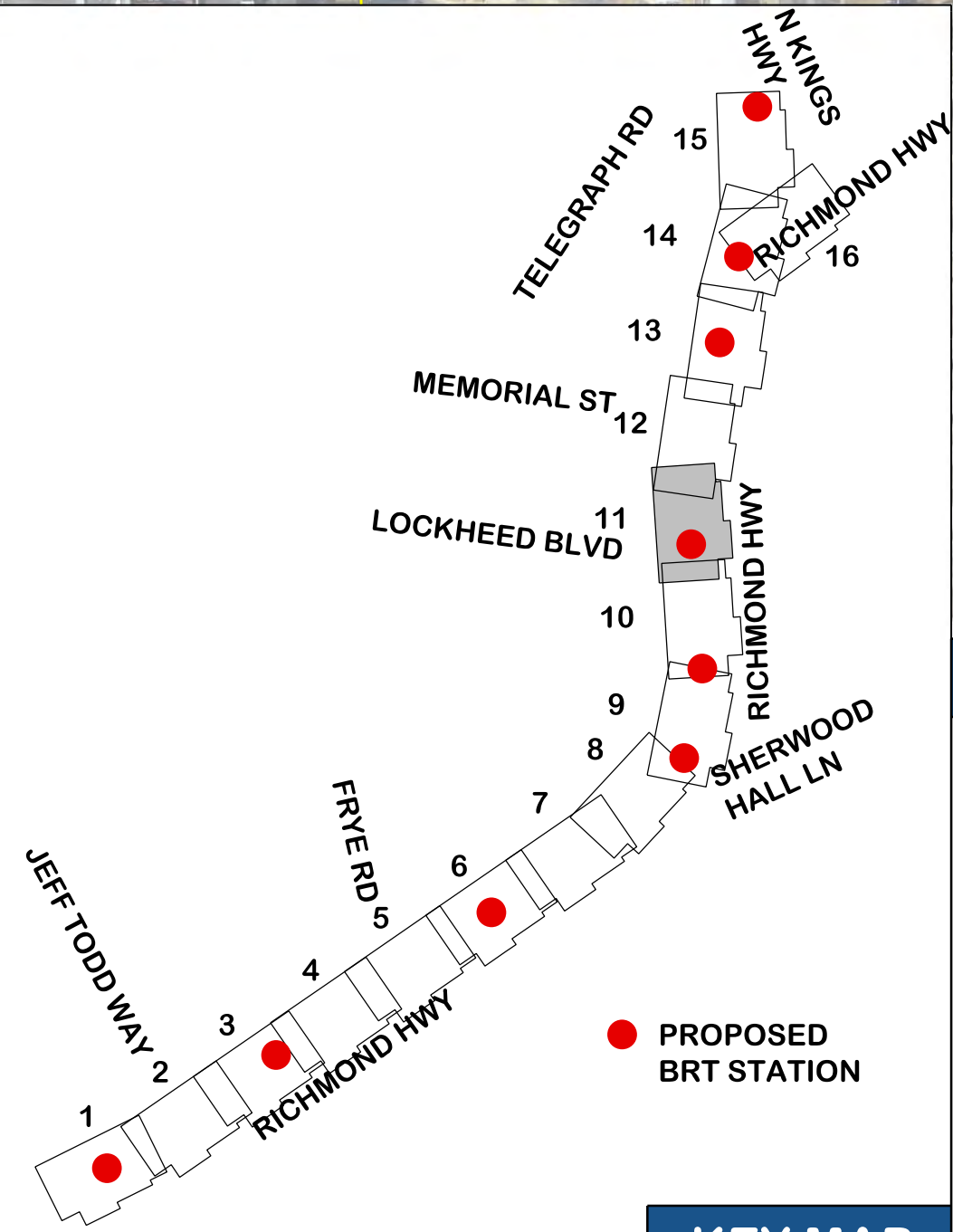
**RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT**

CONCEPTUAL PLAN

March 2021

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PROJECT MANAGER:
SURVEYED BY, DATE:
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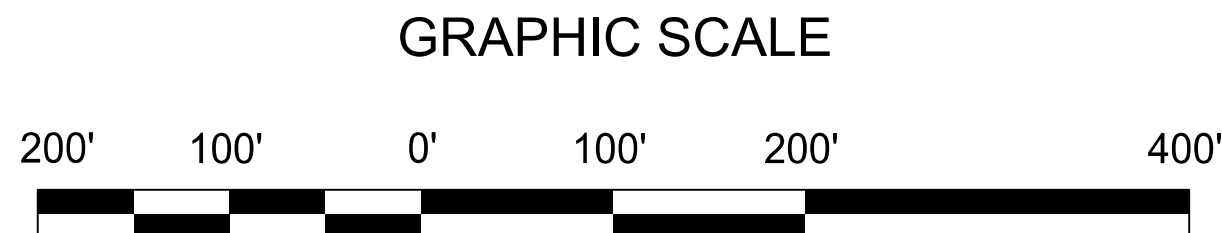




KEY MAP

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LEGEND					
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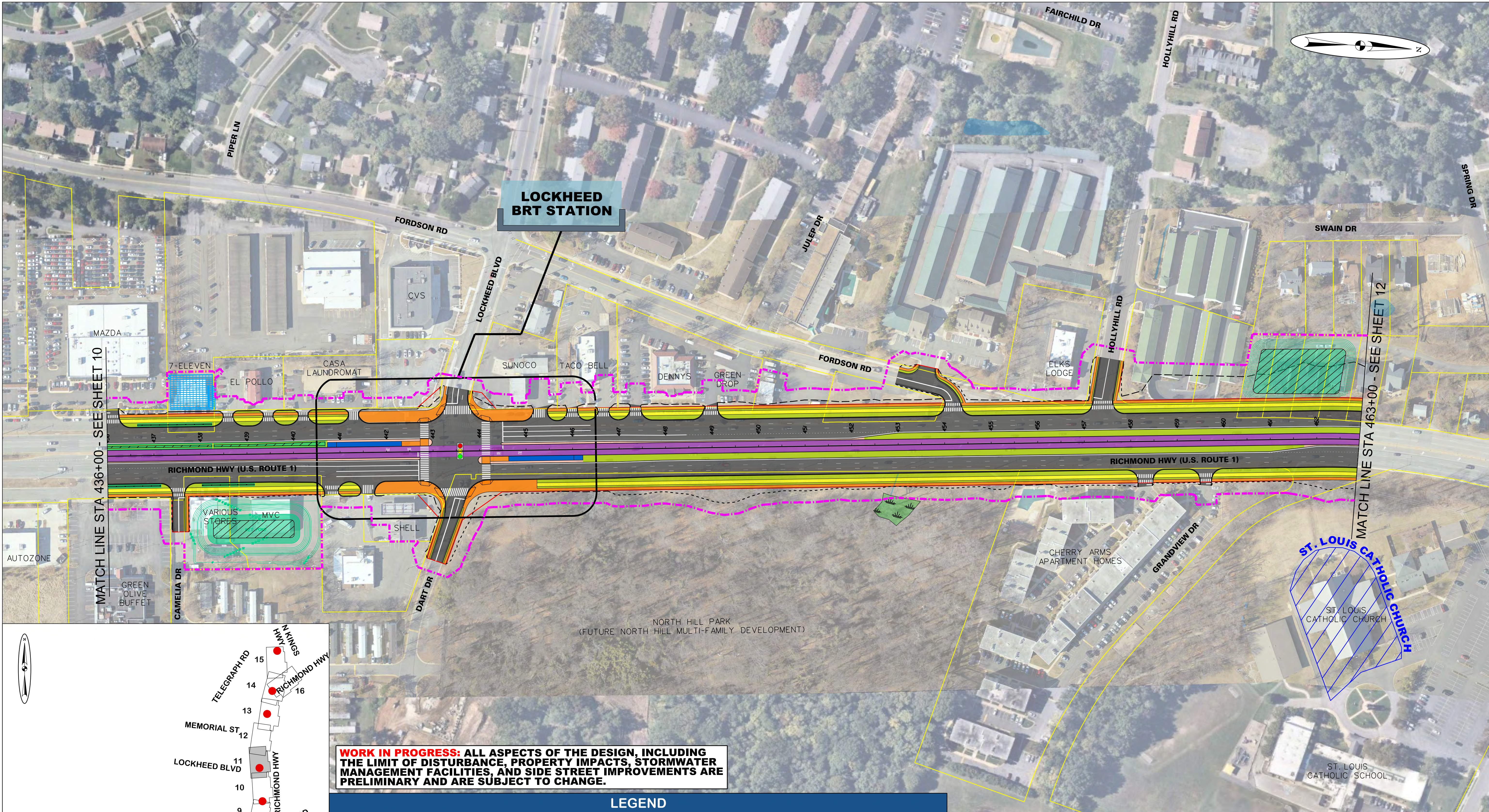
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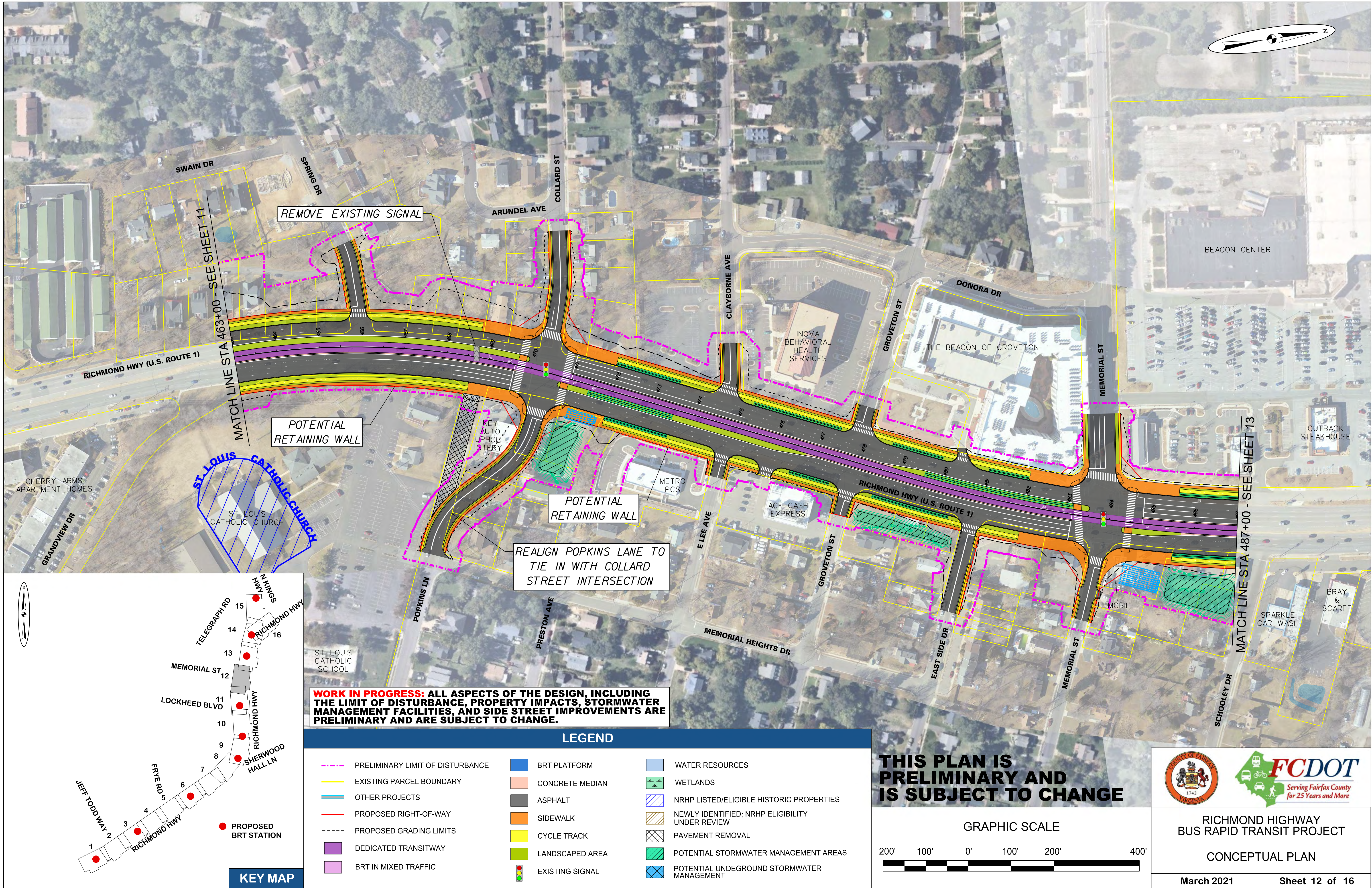
CONCEPTUAL PLAN

March 2021

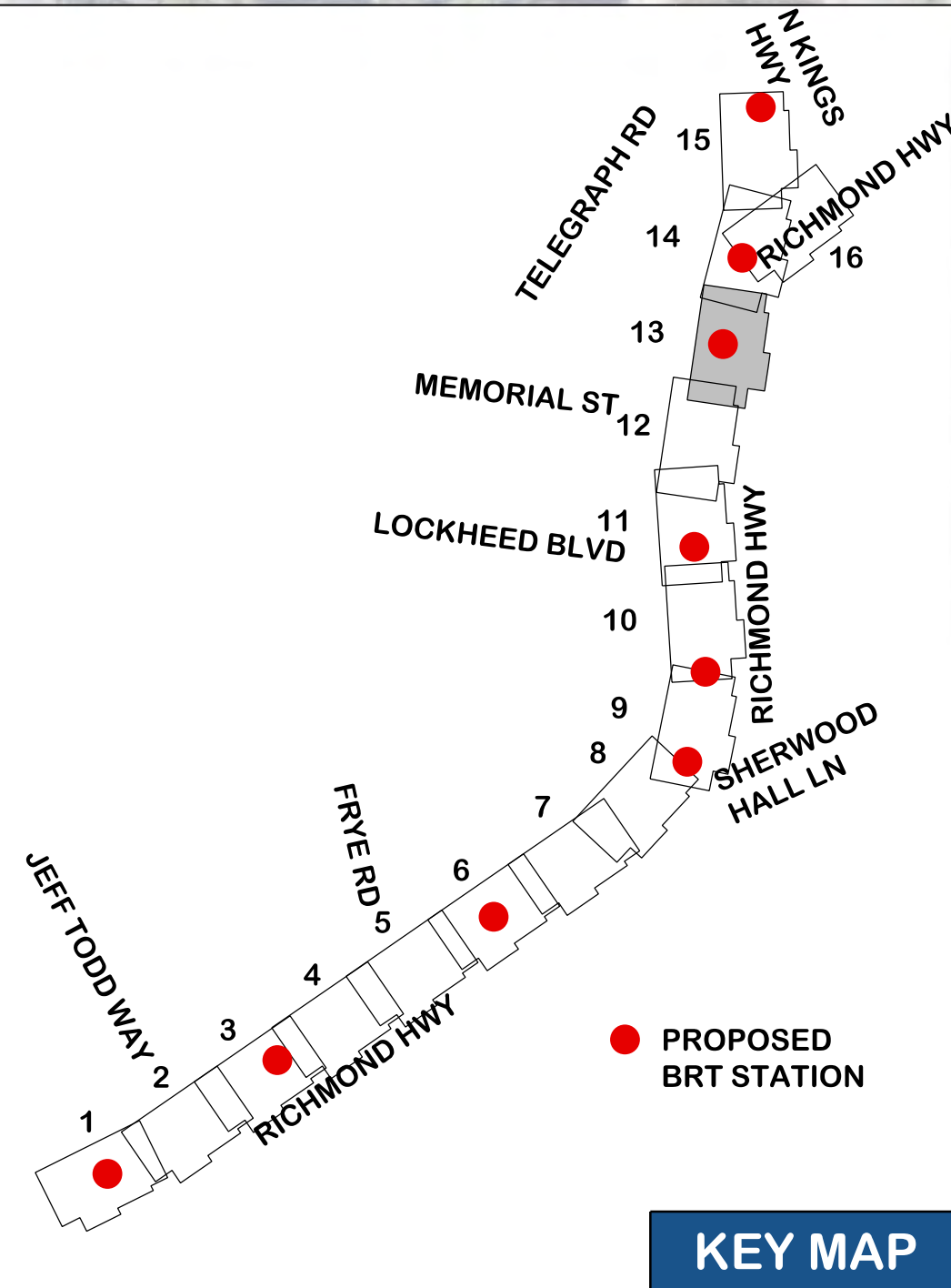
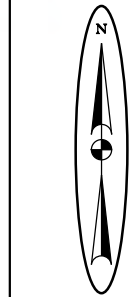
Sheet 11 of 16



PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



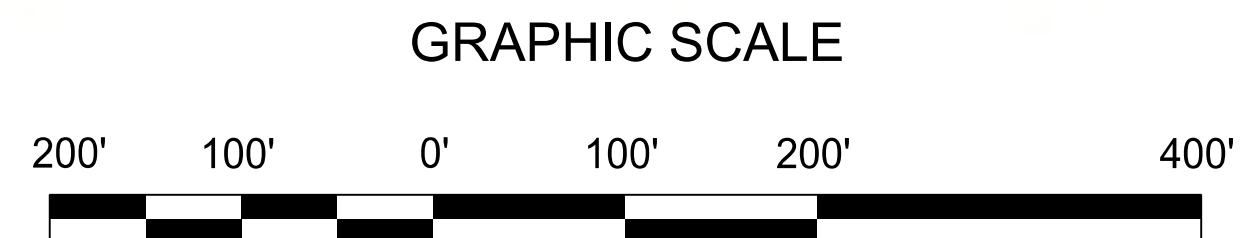
KEY MAP

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LEGEND

- | | | |
|----------------------------------|-----------------|---|
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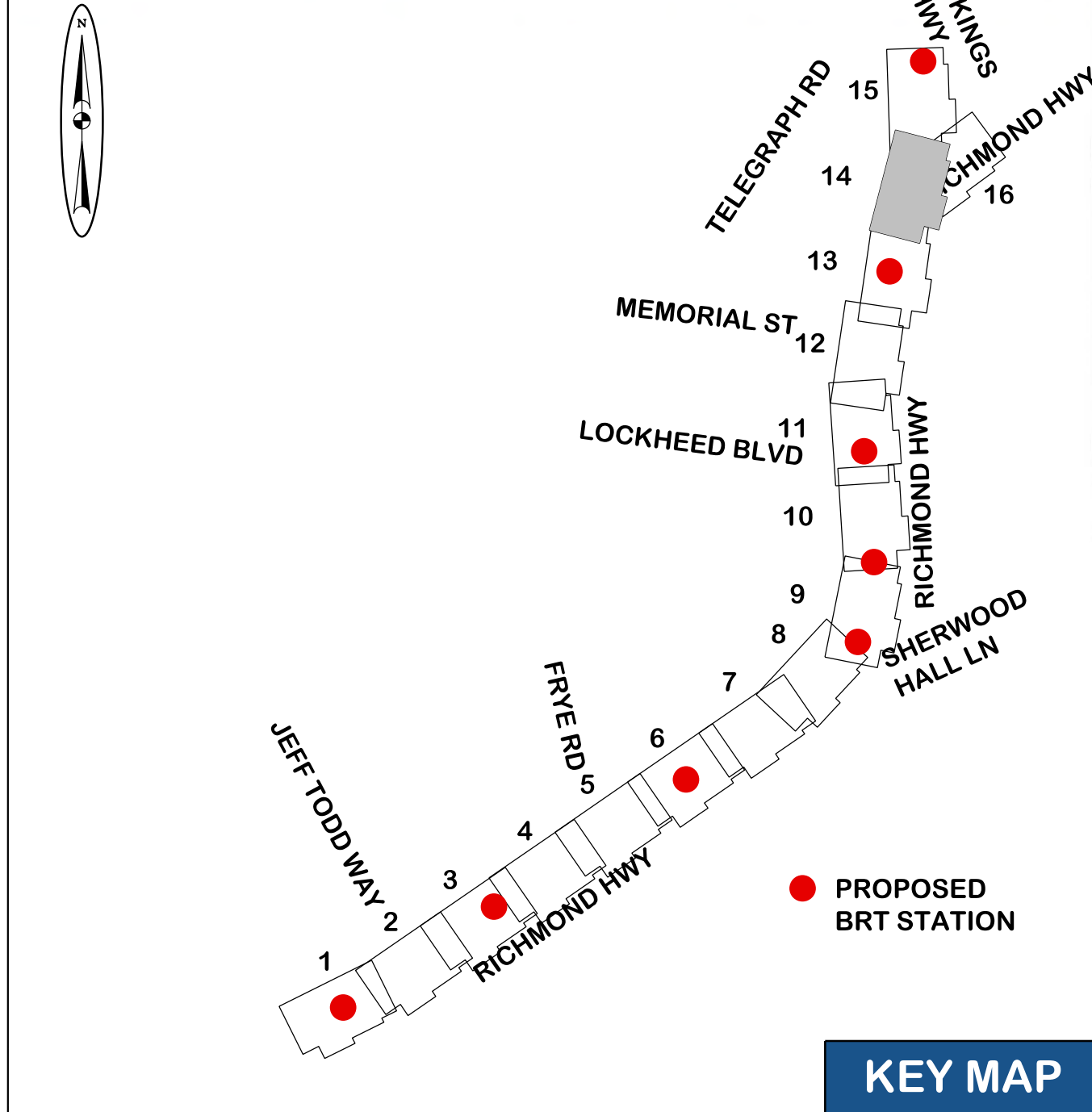
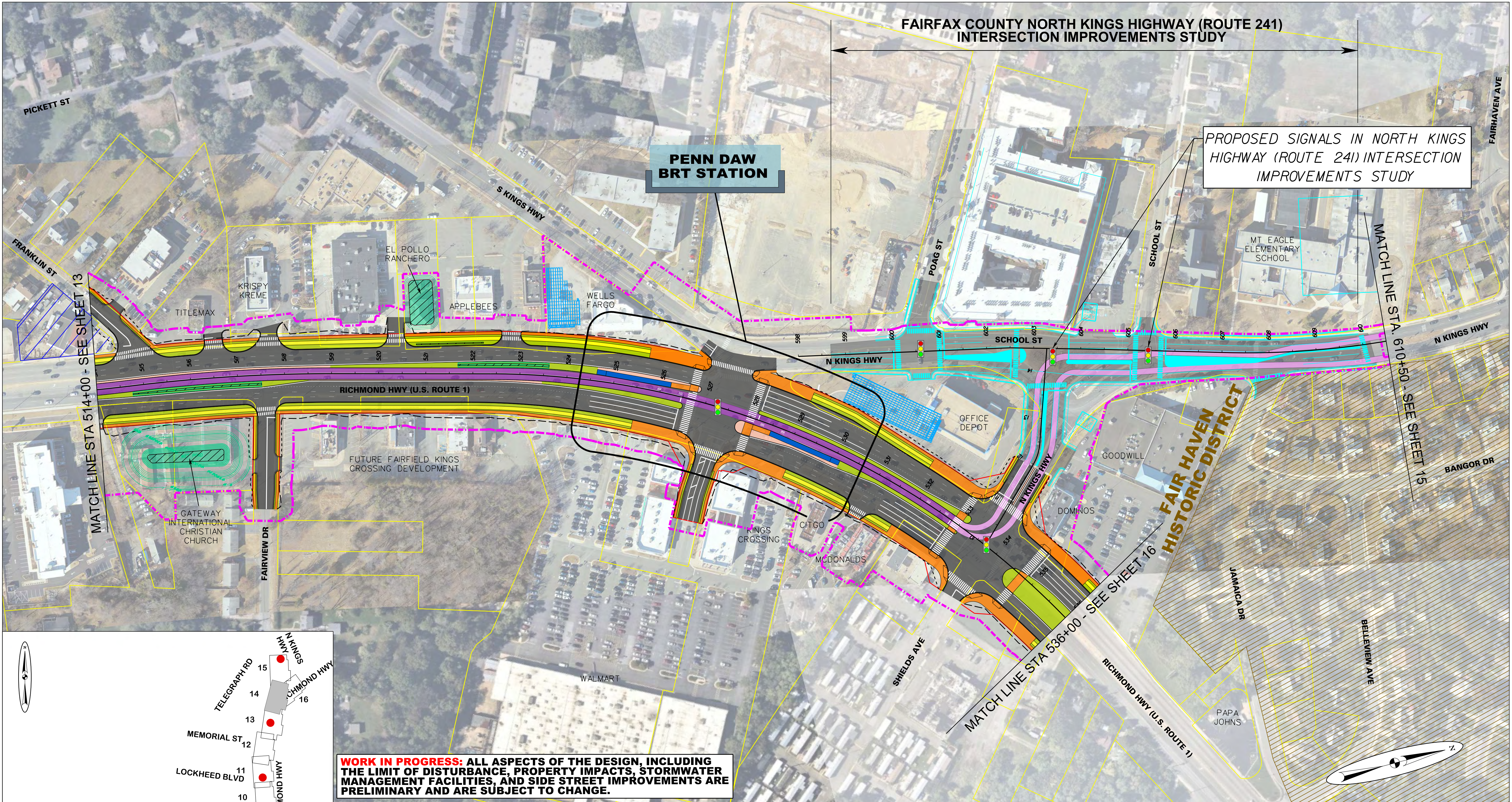
RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

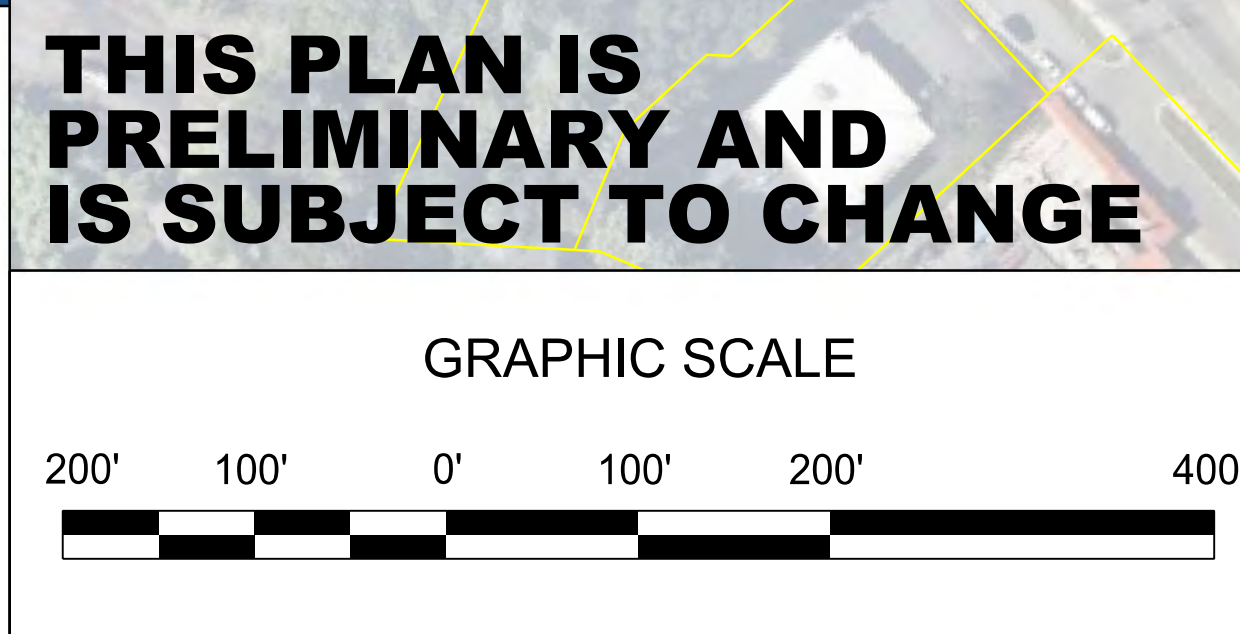
March 2021

Sheet 13 of 16

PROJECT MANAGER:
SURVEYED BY, DATE:
DESIGN SUPERVISED BY:
DESIGN BY:



LEGEND			
	PRELIMINARY LIMIT OF DISTURBANCE		BRT PLATFORM
	EXISTING PARCEL BOUNDARY		CONCRETE MEDIAN
	OTHER PROJECTS		ASPHALT
	PROPOSED RIGHT-OF-WAY		SIDEWALK
	PROPOSED GRADING LIMITS		CYCLE TRACK
	DEDICATED TRANSITWAY		LANDSCAPED AREA
	BRT IN MIXED TRAFFIC		EXISTING SIGNAL
			WATER RESOURCES
			WETLANDS
			NRHP LISTED/ELIGIBLE HISTORIC PROPERTIES
			NEWLY IDENTIFIED; NRHP ELIGIBILITY UNDER REVIEW
			PAVEMENT REMOVAL
			POTENTIAL STORMWATER MANAGEMENT AREAS
			POTENTIAL UNDERGROUND STORMWATER MANAGEMENT



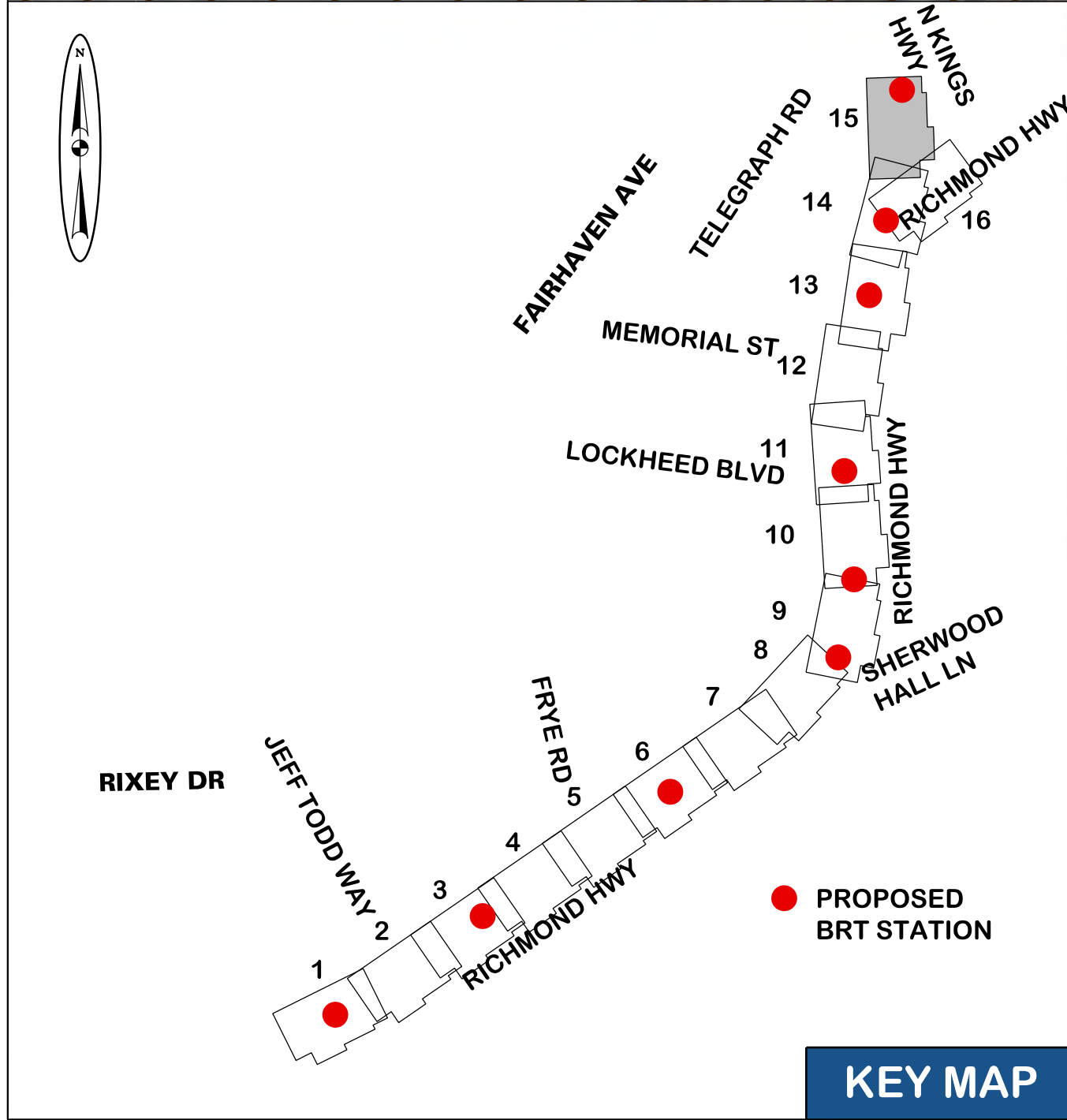
RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

March 2021

Sheet 14 of 16

PROJECT MANAGER:
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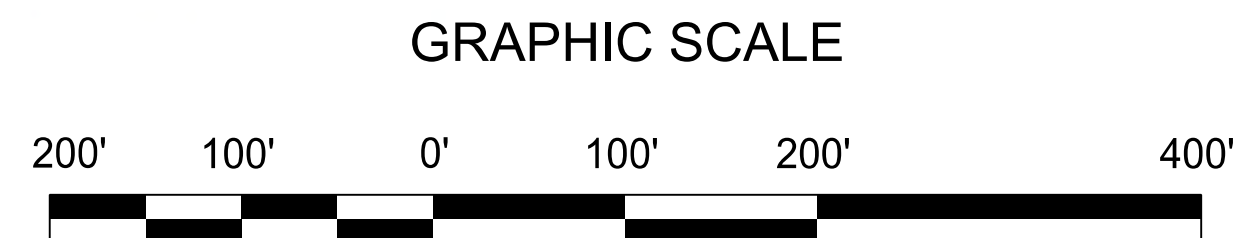


WORK IN PROGRESS: ALL ASPECTS OF THE DESIGN, INCLUDING THE LIMIT OF DISTURBANCE, PROPERTY IMPACTS, STORMWATER MANAGEMENT FACILITIES, AND SIDE STREET IMPROVEMENTS ARE PRELIMINARY AND ARE SUBJECT TO CHANGE.

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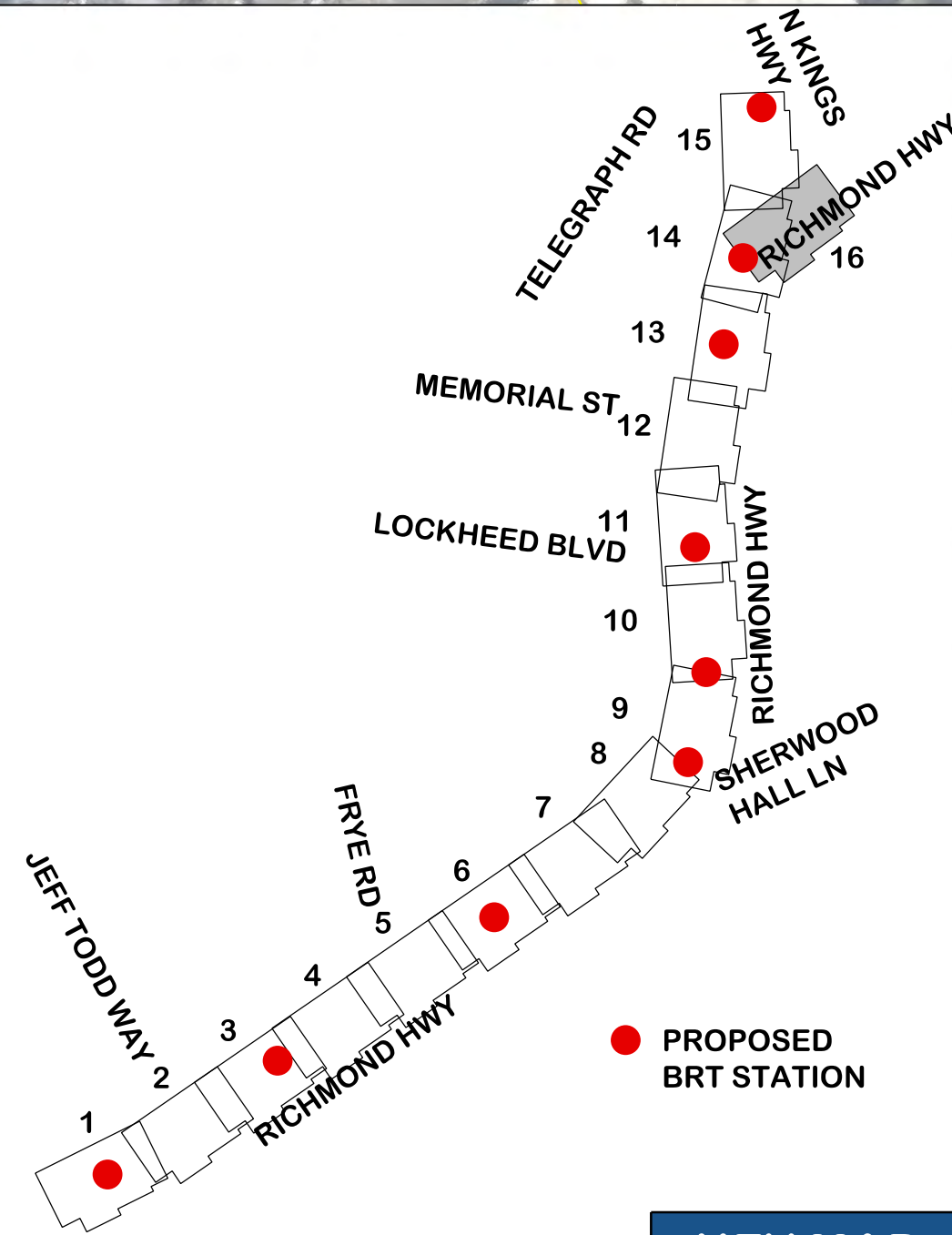
RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

March 2021

Sheet 15 of 16

PROJECT MANAGER:
SURVEYED BY: DATE:
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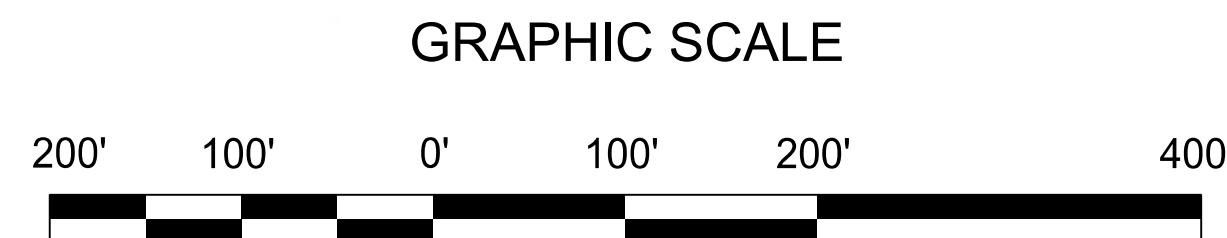
KEY MAP

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	PRELIMINARY LIMIT OF DISTURBANCE		BRT PLATFORM		WATER RESOURCES
	EXISTING PARCEL BOUNDARY		CONCRETE MEDIAN		WETLANDS
	OTHER PROJECTS		ASPHALT		NRHP LISTED/ELIGIBLE HISTORIC PROPERTIES
	PROPOSED RIGHT-OF-WAY		SIDEWALK		NEWLY IDENTIFIED; NRHP ELIGIBILITY UNDER REVIEW
	PROPOSED GRADING LIMITS		CYCLE TRACK		PAVEMENT REMOVAL
	DEDICATED TRANSITWAY		LANDSCAPED AREA		POTENTIAL STORMWATER MANAGEMENT AREAS
	BRT IN MIXED TRAFFIC		EXISTING SIGNAL		POTENTIAL UNDERGROUND STORMWATER MANAGEMENT

**THIS PLAN IS
PRELIMINARY AND
IS SUBJECT TO CHANGE**



RICHMOND HIGHWAY
BUS RAPID TRANSIT PROJECT

CONCEPTUAL PLAN

March 2021

Sheet 16 of 16

APPENDIX B: LIST OF TECHNICAL REPORTS

This appendix lists the Technical Reports that were used to support the conclusions contained in the Richmond Highway Bus Rapid Transit Project Documented CE.

- Archaeology
 - Archaeological Assessment Technical Report
 - Phase I Archaeology Survey
- Historic Architecture
 - Historic Architectural Survey Technical Report
 - Addendum to the Historic Architectural Survey Technical Report
 - Second Addendum to the Historic Architectural Survey Technical Report
 - Historic Architectural Effects Assessment Technical Report
- Natural Resources Technical Report
- Noise and Vibration Technical Report
- Socioeconomic, Land Use, and Community Resources Technical Report

APPENDIX C: AGENCY CORRESPONDENCE

This appendix lists the Agency Correspondence, including initial project outreach and Section 106 Consultation.

Richmond Highway BRT Project Agency Response Summary

Initial contact letters were sent on May 18, 2018 to 53 agency representatives for comment. As of July 23, 2018, responses had been received from 16 representatives:

AGENCY	RESPONDING CONTACT	TITLE
U.S. Environmental Protection Agency (USEPA)	Barbara Okorn	Office of Environmental Programs, EPA Region III
U.S. Department of Housing and Urban Development (US HUD)	Carrie S. Schmidt	Field Office Director, Richmond
Virginia Department of Conservation and Recreation (VDCR)	Roberta Ruhr	Environmental Impact Review Coordinator
Virginia Department of Environmental Quality (VDEQ), Environmental Impact Review	Bettina Rayfield	Program Manager, Environmental Impact Review and Long-Range Priorities
Virginia Department of Environmental Quality, Water Division	Daniel Moore	Principal Environmental Planner, Water Division
Virginia Department of Game and Inland Fisheries (VDGIF), Environmental Services Section	Shirl Dressler	Program Support Technician, Environmental Services Administration
Virginia Department of Health; Office of Drinking Water	Arlene Fields Warren	GIS Program Support Technician
Virginia Department of Housing and Community Development (VDHCD)	Kyle Flanders	Senior Policy Analyst
Virginia Department of Rail and Public Transportation (VDRPT)	Jennifer Mitchell	Director
Fairfax County Department of Housing and Community Development	Ahmed Rayyan	Director; Design, Development, & Construction Division
Fairfax County Department of Neighborhood and Community Services	Pallas Washington	Region 1 Manager
Fairfax County Health Department	Sophia Dutton	Health & Human Services
Fairfax County Park Authority	Kirk W. Kincannon	Executive Director
Fairfax County Department of Planning and Zoning (DPZ)	Marianne R. Gardner	Director; Planning Division
Fairfax County Public Schools	Kevin Sneed	Special Projects Administrator
Fairfax County Water Authority	Gregory J. Prelewicz	Manager, Planning

A summary of responses has been provided below.

Federal

U.S. Environmental Protection Agency (USEPA)

Correspondence from the USEPA included recommendations for the development of the CE and the type of analysis that should be included. The response indicated that the document should describe potential impacts to the natural and human environment, and that adverse impacts to natural resources (especially wetlands, floodplains, and aquatic resources) be avoided and minimized. The USEPA provided recommendations for websites that would provide useful information about natural resources, and stated that stormwater ponds, BMPs, and construction staging areas should not be located in wetlands and streams. The correspondence recommended that the project team consider incorporating Low Impact Development design features, including green infrastructure practices. The USEPA asked that the environmental document include the evaluation of air quality, noise, light, and possible traffic impacts that would result from implementation of the project. The correspondence recommended including a study of potential hazardous sites, an ICE analysis, and suggested that extreme weather events and resiliency design be included. Finally, the USEPA recommended that there be close coordination with the public throughout the process, including EJ communities.

U.S. Department of Housing and Urban Development (HUD)

HUD is supportive of the project and anticipates that it will alleviate some auto commuting pressures on Richmond Highway.

State

Virginia Department of Conservation and Recreation (VDCR)

The VDCR stated that the Accotink Bay-Gunston Cove Stream Conservation Unit is located within and downstream of the project site, and has a biodiversity ranking of B5, which represents a site of general significance. Natural heritage resources associated with this site are the Eastern lampmussel (*Lampsilis radiata*) and the wood turtle (*Glyptemys insculpta*), and the correspondence from VDCR provided information about both species. The Accotink Wetlands Conservation Site is also located within and downstream of the project site. Natural heritage resources of concern at this site include the marsh pea, river bulrush, water-plantain crowfoot, velvet sedge, tidal freshwater marsh (mixed high marsh), coastal plain/outer Piedmont acidic seepage swamp, northern coastal plain/piedmont mesic mixed, and hardwood forest. Parker's pipewort (*Eriocaulon parkeri*) has also been historically documented downstream of the project site.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, VDCR recommended the implementation of and strict adherence to applicable state and local erosion and sediment control/stormwater management laws and regulations. VDCR also recommended coordinating with Virginia's regulatory authority, the Virginia Department of Game and Inland Fisheries (VDGIF) for the management and protection of the wood turtle.

VDCR represents the Virginia Department of Agriculture and Consumer Services regarding potential impacts on state-listed threatened and endangered (T&E) species and indicated that the project activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under VDCR's jurisdiction in the project vicinity.

VDCR asks the project team to resubmit project information and map for an update to the natural heritage information provided if the scope of the project changes and/or six months has passed before the information is utilized. VDCR recommended coordination with VDGIF to ensure compliance with the Virginia Endangered Species Act. Finally, VDCR indicated that Dogue Creek and Unnamed Tributary to Dogue Creek has been designated by VDGIF as T&E Species Waters.

Note: project information was resubmitted in January 2019; information was identical at that time.

Virginia Department of Environmental Quality (VDEQ), Environmental Impact Review

The response from VDEQ's Environmental Impact Review focused on recommendations for the environmental document submission. VDEQ requested that the environmental document include US Geological Survey topographic maps, and that shapefiles be submitted electronically along with the document.

VDEQ provided notice of the initial contact letter to several state agencies, including all offices within VDEQ, VDCR, Virginia Department of Health, Department of Agriculture, VDGIF, Virginia Marine Resources Commission, DHR, Department of Mines, Virginia Department of Forestry, and VDOT.

VDEQ provided information regarding the regulations of the Coastal Zone Management Program and provided a list of databases that would help the team in the preparation of a National Environmental Policy Act (NEPA) document.

Virginia Department of Environmental Quality, Water Division

The representative from VDEQ's Water Division contacted the project team by phone and by letter. First, the representative called the Fairfax County Environmental Lead to specify that he would only review the Chesapeake Bay Preservation Act section; should a full review be required, the project team must send a request via letter to the VDEQ's Office of Environmental Impact Review (Attention: Ms. Valerie Fulcher). Ms. Fulcher was added to the agency contact list and a letter was sent on 3/29/2018. (Note: A letter had already been sent to Ms. Bettina Rayfield from the Environmental Impact Review office).

Secondly, the representative from the VDEQ Water Division sent a memorandum to state that, per 9VAC25-830-150 B of the Regulations, the construction, installation, operation, and maintenance of public roads and their appurtenant structures are exempt from the regulations of the Chesapeake Bay Preservation Act. The memo further detailed several conditions upon which these exemptions are predicated, which included optimization of road alignment and design and local government decisions regarding public road exemptions.

Virginia Department of Game and Inland Fisheries (VDGIF)

The VDGIF sent correspondence indicating that they have staffing limitations and are unable to review projects for which they are not a consulting agency. In lieu of a formal review, they recommended using the Virginia Fish and Wildlife Information System to determine if any wildlife under their jurisdiction may be present near the project site.

Virginia Department of Health, Office of Drinking Water

The correspondence from the Virginia Department of Health, Office of Drinking Water recommended that potential impacts to public water distribution systems or sanitary sewage collection be verified by the local utility. The correspondence also stated that there are no public groundwater wells within a one-mile radius of the project site, and that there are no surface water intakes located within a five-mile radius of the project site. Finally, the correspondence indicated that the project is not within the watershed of any public surface water intakes, and that there are no apparent impacts to public drinking water sources due to this project.

Virginia Department of Housing and Community Development (VDHCD)

Correspondence from VDHCD indicated that their stakeholders have advised that there is at least one homeless shelter in the southern portion of the project area. Additionally, it was noted that there may be scattered site permanent supportive housing along the route. The correspondence indicated that, generally, stakeholders expressed support for more efficient and effective transportation but also advised that some residents and constituents along the proposed route had concerns regarding the affordability of housing in the future.

Virginia Department of Rail and Public Transportation (VDRPT)

VDRPT strongly supports the project, citing the need for additional capacity to move people along the Richmond Highway Corridor, and the conclusions of the Richmond Highway Multimodal Alternatives Analysis. The correspondence included environmental information gleaned through the Multimodal Alternatives Analysis, including information on socioeconomics and EJ, water resources, and property and right-of-way (ROW) impacts. Title VI and EJ concerns will be a factor in the NEPA process, and the analysis should identify whether disproportionately high and adverse effects to EJ populations are anticipated and how to avoid or mitigate any effects. VDRPT recommended making a concerted effort to include EJ populations in public outreach efforts. The letter indicates that temporary indirect impacts to streams, wetlands, and stormwater management would result from construction-related activities. Additionally, any potential impacts from widening the existing bridge over the Occoquan River should be studied. Finally, VDRPT recommends studying effective multimodal access to stations. Without transportation capacity improvements to encourage pedestrian and transit travel, VDRPT believes it is unlikely that projected growth can be accommodated within the corridor. The letter recommends that the VDRPT Multimodal System Design Guidelines be used as a guide for best practices.

Local

Fairfax County Department of Housing and Community Development

The response from the Fairfax County Department of Housing and Community Development (via email) largely centered on the North Hill Project, located at the corner of Richmond Highway and Dart Drive. The North Hill property is being redeveloped and includes the construction of roughly 280 affordable multifamily units (as well as 150-175 market-rate townhouses). ROW dedication was included as part of rezoning approval, and the Department is under the impression that any impacts from a BRT project were taken into account during this rezoning process.

The response also requested that the project team take the location of affordable housing into account when determining locations of BRT stations.

The email included two documents: the development plan for North Hill, and a graphic showing the locations of affordable housing along Richmond Highway owned by Fairfax County Redevelopment and Housing Authority.

Fairfax County Department of Neighborhood and Community Services

The Fairfax County Department of Neighborhood and Community Services provided a bulleted list of interests and concerns, including: ensuring that all walkways and pedestrian crossings/access points are safe (pedestrian safety concerns were reiterated several times); concern regarding stormwater and its impact on the watershed; an interest in eco-friendly buses; a request for the process to be inclusive with respect to public engagement; a request for the project to work with local businesses to help with relocations, if necessary; an interest in locating bus stations near heavily populated sections of the corridor; and a recommendation to look into the Governor's Opportunity Zones.

Fairfax County Health Department

The Fairfax County Health Department sent an email with a spreadsheet containing demographic data aggregated to a 1-mile radius around proposed BRT bus stops in Fairfax County. The spreadsheet also included data from responses to two questions from a 2016 Fairfax County Youth Survey, which asked 8th, 10th, and 12th graders how safe they felt in their respective neighborhoods, as well as whether extracurricular activities were available in their communities.

Fairfax County Park Authority

The response from the Fairfax County Park Authority stated that the project doesn't appear to have direct impacts to parkland, and that Richmond Highway improvements were anticipated when the North Hill site was reviewed. If the final alignment or planned improvements are found to result in direct impacts, the Park Authority requested that the project team coordinate with them.

The response also stated that modifications to the design and construction of Richmond Highway would have a significant potential to cause indirect impacts to parkland, and that much of the land along the highway corridor is sensitive to changes in hydrology. The letter detailed rare species and habitats in parks on the northwest side of Richmond Highway (Huntley Meadows and Pole Road Park) and the stream valley park connections on the east side of the highway. The correspondence urged that any improvements carefully consider the area's hydrology and environmental sensitivity, and that the document should consider more than just the conveyance of storm flow. The Park Authority requested the consideration of solutions to encourage wildlife passage for any changes to the structural design of Richmond Highway, particularly at stream crossings.

The correspondence indicated that the project is not required to perform an archaeological survey, but the Park Authority requested that any project efforts be coordinated with the Park Authority's Resource Management Division.

The Park Authority also requested that special attention be paid to the Woodlawn Historic Overlay District.

The letter referred to Section 106 and asked the project team to coordinate with the State Historic Preservation Office.

Two attachments were included with the letter: a map of the Woodlawn Historic Overlay District and an Archaeological Survey Data Form, Parts A and B.

Fairfax County Department of Planning and Zoning (DPZ)

The response from Fairfax County DPZ included comments on noise, stream crossings, and stormwater management. It should be noted that the response seemingly conflates the Richmond Highway Widening work with the project at different points. First, the response was concerned with ensuring acceptable levels of transportation-generated noise impacts on residential and other noise-sensitive uses and recommended reviewing the Comprehensive Plan for guidance (based on FHWA and HUD recommendations). DPZ stated that it may be appropriate to consider mitigation measures as part of the proposed scope of work. Second, the response provided information about watersheds within the corridor, existing stream crossings, RPAs, and environmental quality corridors. The responses stated that any improvements or expansions to existing stream crossings should take into consideration short- and long-term impacts, as well as mitigation measures. New stream crossings should be discouraged. Finally, the response introduced the Public Facilities Manual, which serves as the guiding document for stormwater management requirements. It was recommended that the project not create or aggravate adverse impacts to streams, and that measures considered for managing stormwater take into consideration aiding in the reversal of adverse impacts associated with past practices.

Fairfax County Public Schools

The correspondence with Fairfax County Public Schools (FCPS) indicated that the Office of Design and Construction Office had reviewed the material provided, and that FCPS had no comments or objections regarding the proposed project.

Fairfax County Water

Fairfax County Water indicated that existing facilities along the corridor include water mains: the Beacon Hill Water Storage Tank, the Gum Springs Storage Tanks and Pumping Station, and the Groveton Storage Tank (not in service). Future system improvements identified in the 2011 update to the System Master Plan that are along Richmond Highway include: an extension of the existing transmission water main from Richmond Highway at Quander Road to Huntington Avenue and up Huntington Avenue to Telegraph Road; the replacement and oversize of existing water mains along Richmond Highway from Woodlawn to Alexandria; the construction of an additional water storage tank at the Beacon Hill site; and improvements to the Gum Springs Pump Station, including installation of at least two new pumps.

Richmond Highway BRT Project Agency Responses

From: Okorn, Barbara [<mailto:Okorn.Barbara@epa.gov>]
Sent: Thursday, May 3, 2018 4:29 PM
To: daniel.koenig@dot.gov; DOT BRT <DOTBRT@fairfaxcounty.gov>
Cc: Rudnick, Barbara <Rudnick.Barbara@epa.gov>
Subject: Richmond Highway Bus Rapid Transit Program

Mr. Koenig,

EPA has reviewed Fairfax County's letter dated March 26, 2018 regarding the Richmond Highway Bus Rapid Transit Program in Fairfax County, Virginia. Thank you for coordinating with us. We understand that the study is being done in compliance with the National Environmental Policy Act (NEPA) and CEQ regulations implementing NEPA and will be a Categorical Exclusion (CE). The purpose of this CE is to evaluate potential environmental resource impacts associated with the addition of two Bus Rapid Transit dedicated median lanes along most of the project corridor; nine stations; roadway widening; streetscape improvements; and accommodations for future walkway, trail, and bicycle connections. Please find below suggestions for the proposed study.

- The document should describe potential impacts to the natural and human environment. Existing resources should be identified and EPA encourages that adverse impacts to natural resources, especially wetlands, floodplains and other aquatic resources, be avoided and minimized.
- Some information on resources may be gained from public websites including:
 - EnviroMapper¹: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
 - Envirofacts²: <https://www3.epa.gov/enviro/>
 - NEPAassist³: <https://www.epa.gov/nepa/nepassist>
 - 303(d) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>
 - Watershed Resources Registry: <https://watershedresourcesregistry.org/index.html>. This newly released mapping and screening tool prioritizes areas for preservation and restoration of wetlands, riparian zones, terrestrial areas, and stormwater management across several states in the mid-Atlantic region, including Pennsylvania. This tool is useful for planners to access environmental data to avoid impacting natural areas and identify optimal mitigation areas.

- Stormwater ponds, best management practices (BMPs) and construction staging areas should not be located in wetlands and streams. Stormwater management alternatives that address the existing and new construction should be considered and are encouraged.
- For this and future projects, please consider the following: to reduce runoff volume and improve water quality, EPA recommends where possible the incorporation of Low Impact Development (LID) design features. Technical guidance in implementing green infrastructure (GI) practices and LID can be found at: <https://19january2017snapshot.epa.gov/sites/production/files/2015-09/documents/eisa-438.pdf> and www.epa.gov/greeninfrastructure. We suggest LID options be considered for design of features such as parking, paving, and landscaping. Other information can be found at www.epa.gov/nps/lid ; U.S. EPA's Smart Growth Website: www.epa.gov/smartgrowth ; and the International Stormwater BMP Database: <http://www.bmpdatabase.org>
- An evaluation of air quality and community impacts, including noise, light and possible traffic impacts, should be considered. General conformity status should be included in the document.
- We recommend the study include an analysis of any potential hazardous sites, including RCRA sites, and the status of any ongoing or past remediation efforts in the project area.
- We suggest extreme weather events be considered in particular in association with resiliency design.
- The document should address potential indirect and cumulative effects in the project areas; the cumulative impact analysis should evaluate impacts to environmental resources that have the potential to be impacted by the project (e.g. historic and community resources, parkland etc). Analysis may aid in the identification of resources that are likely to be adversely affected by multiple projects, and sensitive resources that could require additional avoidance or mitigation measures. It is suggested that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project. Secondary effects associated with transit stations should be evaluated: potential additional development around facilities should be considered, and community and natural resource impacts assessed.
- We encourage close coordination with the public and that the project team reach out to any environmental justice communities. Churches and civic groups and well as community newsletters can provide an opportunity for this outreach.

Thank you for coordinating with EPA on this project. Please let me know if you have any questions on the recommended topics above.

- 1 The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases
- 2 Includes enforcement and compliance information
- 3 NEPAAssist is a tool that facilitates the environmental review process and project planning in relation to environmental considerations. The web-based application draws environmental data dynamically from EPA Geographic Information System databases and web services and provides immediate screening of environmental assessment indicators for a user-defined area of interest. These features contribute to a streamlined review process that potentially raises important environmental issues at the earlier stages of project development.

Barbara Okorn

Office of Environmental Programs
US EPA, Region III
1650 Arch Street (3EA30)
Philadelphia, PA 19103
215-814-3330



U. S. Department of Housing & Urban Development

Richmond Field Office
600 E. Broad Street, 3rd Floor
Richmond, VA 23219
1-800-842-2610

April 9, 2018

Fairfax County Department of Transportation
Ms. Vanessa Aguayo, PE – Project Manager
Capital Projects & Traffic Engineering Division
4050 Legato Road, Suite 400
Fairfax, Virginia 22033

Dear Ms. Aguayo:

Thank you for your letter of March 26, relating to the development of a Categorical Excluded environmental review to evaluate potential Bus Rapid Transit (BRT) transportation improvements along the U.S. Route 1 corridor for approximately nine miles between the Huntington Metro Station on Route 241/North Kings Highway and the intersection of Route 286/Fairfax County Parkway and U.S. Route 1/Richmond Highway (Project Number: 400-C40013).

You requested information to help identify transportation needs, human and environmental resources, and the full range of relevant factors related to the study. Your letter further requested that HUD provide comments on any issues or concerns regarding social, economic or natural resources under the jurisdiction of the HUD Virginia State Field Office.

After review of the location, the HUD Richmond Field Office is supportive of the addition of Bus Rapid Transit lanes in the median of the target corridor. Adding BRT should alleviate some auto commuting pressure on U.S. Route 1. Further, the HUD Richmond Field Office is aware that most of the proposed corridor is already carrying local bus service (Bus Route 171), so the addition of dedicated BRT lanes and stops should help make bus commuter service more dependable and timely in a corridor with which users are acclimated.

Thank you for your interest in the Department's programs. If you have any further questions, please contact me at (804) 822-4807. Members of your staff who have questions or require technical assistance may contact Mr. Kerry Johnson, Field Environmental Officer, at 822-4803.

Sincerely,

A handwritten signature in blue ink, reading "Carrie S. Schmidt", is positioned above the printed name.

Carrie S. Schmidt
Field Office Director

Matthew J. Strickler
Secretary of Natural Resources

Clyde E. Cristman
Director



Rochelle Altholz
Deputy Director of
Administration and Finance

Russell W. Baxter
Deputy Director of
Dam Safety & Floodplain
Management and Soil & Water
Conservation

Thomas L. Smith
Deputy Director of Operations

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

MEMORANDUM

DATE: May 4, 2018

TO: DOTBRT@fairfaxcounty.gov

FROM: Roberta Rhur, Environmental Impact Review Coordinator

SUBJECT: DCR 18 – 013, FAIR 400-C40013, Richmond Highway Bus Rapid Transit Program

Division of Natural Heritage

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Accotink Bay – Gunston Cove Stream Conservation Unit is located within and downstream of the project site. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Accotink Bay – Gunston Cove SCU has been given a biodiversity ranking of B5, which represents a site of general significance. The natural heritage resources associated with this site are:

<i>Lampsilis radiata</i>	Eastern lampmussel	G5/S2S3/NL/NL
<i>Glyptemys insculpta</i>	Wood turtle	G3/S2/NL/LT

The Eastern lampmussel is a freshwater mussel which inhabits river systems in areas with substrates composed of silt, sand, cobble, gravel and exposed bedrock (NatureServe, 2009). This species has a wide range, from eastern Canada west to Ontario and Quebec and south to South Carolina (NatureServe, 2009). In Virginia, there are records from the Chowan and York River drainages.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and

farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Furthermore, the Accotink Wetlands Conservation Site is located within and downstream of the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Accotink Wetlands Conservation Site has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern at this site are:

<i>Lathyrus palustris</i>	Marsh pea	G5/S1/NL/NL
<i>Bolboschoenus fluviatilis</i>	River bulrush	G5/S2/NL/NL
<i>Ranunculus ambigens</i>	Water-plantain crowfoot	G4/S1/NL/NL
<i>Carex vestita</i>	Velvet sedge	G5/S2/NL/NL
	Tidal Freshwater Marsh (Mixed High Marsh Type)	G3/S4?/NL/NL
	Coastal Plain / Outer Piedmont Acidic Seepage Swamp	G3?/S3/NL/NL
	Northern Coastal Plain / Piedmont Mesic Mixed	G5/S5/NL/NL
	Hardwood Forest	

In addition, Parker's pipewort (*Eriocaulon parkeri*, G3/S2/NL/NL) has been historically documented downstream of the project site. Parker's pipewort is classified as very rare to uncommon in Virginia. This diminutive pipewort species displays a greyish-white button flower and often occurs with other rare mudwort species in the intertidal zone of tidal regions from Maine to North Carolina. Potential threats include activities that alter natural river currents causing sedimentation, which could inhibit germination of seeds or smother seedlings, and/or erosion of the habitat. Other potential threats include activities that result in increased salinity levels, water pollution, and displacement by aggressive species (J. C. Ludwig, 1996). Parker's pipewort has been documented at 29 occurrences in Virginia with 11 of those historical or extirpated. Surveys for this species should be conducted during the flowering / fruiting period from July to October.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit project information and map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

The VDGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov. According to the information currently in our files, Dogue Creek and Unnamed tributary to Dogue Creek, which have been designated by the VDGIF as “Threatened and Endangered Species Waters” for the Wood turtle are within 2 miles of the project site. Therefore, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

The remaining DCR divisions have no comments regarding the scope of this project. Thank you for the opportunity to comment.

CC: Amy Ewing, VDGIF

Literature Cited

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COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

April 3, 2018

Vanessa Aguayo
ATTN: Richmond Highway BRT Project
Fairfax County Department of Transportation
4050 Legato Road, Suite 400
Fairfax, Virginia 22033
Via email: DPTBRT@fairfaxcounty.gov

RE: Richmond Highway Bus Rapid Transit Program, Fairfax County, Virginia

Dear Ms. Aguayo:

This letter is in response to the scoping request for the above-referenced project.

As you may know, the Department of Environmental Quality, through its Office of Environmental Impact Review (DEQ-OEIR), is responsible for coordinating Virginia's review of federal environmental documents prepared pursuant to the National Environmental Policy Act (NEPA) and responding to appropriate federal officials on behalf of the Commonwealth. Similarly, DEQ-OEIR coordinates Virginia's review of federal consistency documents prepared pursuant to the Coastal Zone Management Act which applies to all federal activities which are reasonably likely to affect any land or water use or natural resources of Virginia's designated coastal resources management area must be consistent with the enforceable policies Virginia Coastal Zone Management (CZM) Program.

DOCUMENT SUBMISSIONS

In order to ensure an effective coordinated review of the NEPA document and federal consistency documentation, notification of the NEPA document and federal consistency documentation should be sent directly to OEIR. We request that you submit one electronic to eir@deq.virginia.gov (25 MB maximum) or make the documents available for download at a website, file transfer protocol (ftp) site or the VITA LFT file share system (Requires an "invitation" for access. An invitation request should be sent to eir@deq.virginia.gov). We request that the review of these two documents be done concurrently, if possible.

The NEPA document and the federal consistency documentation (if applicable) should include U.S. Geological Survey topographic maps as part of their information. We strongly encourage you to issue shape files with the NEPA document. In addition, project details should be adequately described for the benefit of the reviewers.

ENVIRONMENTAL REVIEW UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT: PROJECT SCOPING AND AGENCY INVOLVEMENT

As you may know, NEPA (PL 91-190, 1969) and its implementing regulations (Title 40, *Code of Federal Regulations*, Parts 1500-1508) requires a draft and final Environmental Impact Statement (EIS) for federal activities or undertakings that are federally licensed or federally funded which will or may give rise to significant impacts upon the human environment. An EIS carries more stringent public participation requirements than an Environmental Assessment (EA) and provides more time and detail for comments and public decision-making. The possibility that an EIS may be required for the proposed project should not be overlooked in your planning for this project. Accordingly, we refer to “NEPA document” in the remainder of this letter.

While this Office does not participate in scoping efforts beyond the advice given herein, other agencies are free to provide scoping comments concerning the preparation of the NEPA document. Accordingly, we are providing notice of your scoping request to several state agencies and those localities and Planning District Commissions, including but not limited to:

Department of Environmental Quality:

- DEQ Regional Office*
- Air Division*
- Office of Wetlands and Stream Protection*
- Office of Local Government Programs*
- Division of Land Protection and Revitalization
- Office of Stormwater Management*

Department of Conservation and Recreation

Department of Health*

Department of Agriculture and Consumer Services

Department of Game and Inland Fisheries*

Virginia Marine Resources Commission*

Department of Historic Resources

Department of Mines, Minerals, and Energy

Department of Forestry

Department of Transportation

Note: The agencies noted with a star (*) administer one or more of the enforceable policies of the Virginia CZM Program.

FEDERAL CONSISTENCY UNDER THE COASTAL ZONE MANAGEMENT ACT

Pursuant to the federal Coastal Zone Management Act of 1972, as amended, and its implementing regulations in Title 15, *Code of Federal Regulations*, Part 930, federal activities, including permits, licenses, and federally funded projects, located in Virginia’s Coastal Management Zone or those that can have reasonably foreseeable effects on Virginia’s coastal uses or coastal resources must be conducted in a manner which is consistent, to the maximum extent practicable, with the Virginia CZM Program.

Additional information on the Virginia’s review for federal consistency documents can be found online at

<http://www.deq.virginia.gov/Programs/EnvironmentalImpactReview/FederalConsistencyReviews.aspx>

DATA BASE ASSISTANCE

Below is a list of databases that may assist you in the preparation of a NEPA document:

- DEQ Online Database: Virginia Environmental Geographic Information Systems

Information on Permitted Solid Waste Management Facilities, Impaired Waters, Petroleum Releases, Registered Petroleum Facilities, Permitted Discharge (Virginia Pollution Discharge Elimination System Permits) Facilities, Resource Conservation and Recovery Act (RCRA) Sites, Water Monitoring Stations, National Wetlands Inventory:

- www.deq.virginia.gov/ConnectWithDEQ/VEGIS.aspx

- DEQ Virginia Coastal Geospatial and Educational Mapping System (GEMS)

Virginia's coastal resource data and maps; coastal laws and policies; facts on coastal resource values; and direct links to collaborating agencies responsible for current data:

- <http://128.172.160.131/gems2/>

- MARCO Mid-Atlantic Ocean Data Portal

The Mid-Atlantic Ocean Data Portal is a publicly available online toolkit and resource center that consolidates available data and enables users to visualize and analyze ocean resources and human use information such as fishing grounds, recreational areas, shipping lanes, habitat areas, and energy sites, among others.

<http://portal.midatlanticocean.org/visualize/#x=-73.24&y=38.93&z=7&logo=true&controls=true&basemap=Ocean&tab=data&legends=false&layers=true>

- DHR Data Sharing System.

Survey records in the DHR inventory:

- www.dhr.virginia.gov/archives/data_sharing_sys.htm

- DCR Natural Heritage Search

Produces lists of resources that occur in specific counties, watersheds or physiographic regions:

- www.dcr.virginia.gov/natural_heritage/dbsearchtool.shtml

- DGIF Fish and Wildlife Information Service

Information about Virginia's Wildlife resources:

- <http://vafwis.org/fwis/>

- Environmental Protection Agency (EPA) Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) Database: Superfund Information Systems

Information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation, including sites that are on the National Priorities List (NPL) or being considered for the NPL:

- www.epa.gov/superfund/sites/cursites/index.htm

- EPA RCRAInfo Search

Information on hazardous waste facilities:

- www.epa.gov/enviro/facts/rcrainfo/search.html

- EPA Envirofacts Database

EPA Environmental Information, including EPA-Regulated Facilities and Toxics Release Inventory Reports:

- www.epa.gov/enviro/index.html

- EPA NEPAassist Database


Facilitates the environmental review process and project planning:

<http://nepaassisttool.epa.gov/nepaassist/entry.aspx>

If you have questions about the environmental review process and/or the federal consistency review process, please feel free to contact me (telephone (804) 698-4204 or e-mail bettina.rayfield@deq.virginia.gov).

I hope this information is helpful to you.

Sincerely,



Bettina Rayfield, Program Manager
Environmental Impact Review and
Long-Range Priorities



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 1111 East Main Street, Suite 1400, Richmond, VA 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

MEMORANDUM

TO: Vanessa Aguayo, Fairfax County Department of Transportation

FROM: Daniel Moore, DEQ Principal Environmental Planner

DATE: April 4, 2018

SUBJECT: SCOPING Richmond Highway Bus Rapid Transit Program Project – Fairfax County

We have reviewed the submitted information for the proposed project and offer the following comments regarding consistency with the provisions of the *Chesapeake Bay Preservation Area Designation and Management Regulations* (Regulations).

In Fairfax County, the areas protected by the Chesapeake Bay Preservation Act require conformance with performance criteria within locally designated Chesapeake Bay Preservation Areas (CBPAs), which include Resource Protection Areas (RPAs) and Resource Management Areas (RMAs). As designated by the County, RPAs include tidal wetlands, certain non-tidal wetlands, tidal shores, and a 100-foot vegetated buffer area located adjacent to and landward of these features and along both sides of any water body with perennial flow. RMAs, which require less stringent performance criteria than RPAs, include all areas of the County not designated as RPA.

The information provided indicates that the project will be located along a nine-mile corridor between the Huntington Metro Station on Route 241 and the intersection of Route 286 and US Route 1.

Per 9VAC25-830-150 B of the Regulations, the construction, installation, operation and maintenance of public roads and their appurtenant structures are exempt from the Regulations, as long as the project is in accordance with (i) regulations promulgated pursuant to the *Virginia Erosion and Sediment Control Handbook*, and stormwater management criteria consistent with water quality protection provisions of the *Virginia Stormwater Management Regulations*, (ii) an erosion and sediment control plan and a stormwater management plan approved by DEQ, or (iii) local water quality protection at least as stringent as the above state requirements. The exemption of public roads is further conditioned on the following:

- a) Optimization of the road alignment and design, consistent with other applicable requirements, to prevent or otherwise minimize encroachment into the RPA and adverse effects on water quality; and
- b) Local governments may choose to exempt all public roads as defined in 9VAC25-830-40 of the Regulations, or only those public roads constructed by the Virginia Department of Transportation.

C: Bettina Rayfield, DEQ Office of Environmental Impact Review



Matthew J. Strickler
Secretary of Natural Resources

COMMONWEALTH of VIRGINIA
Department of Game and Inland Fisheries

Robert W. Duncan
Executive Director

March 28, 2018

Ms. Vanessa Aguayo/Mr. Douglas C. Miller
Fairfax County Dept. of Transportation
4050 Legato Road, Suite 400
Fairfax, VA 22033

Re: Request for Determination of Impact upon Wildlife Resources: Richmond Hwy Bus Rapid Transit Program

Dear Ms. Aguayo/Mr. Miller:

We appreciate that you submitted your project(s) for review by VDGIF to ensure the protection of sensitive wildlife resources during project development. Due to current staffing limitations within our Fish and Wildlife Information Services (FWIS) and Environmental Services sections, we are unable to review and provide comments on projects that are not currently involved in one of the regulatory review processes for which we are a consultative agency (see <http://www.dgif.virginia.gov/environmental-programs/environmental-services-section.asp>). Please note that no response from VDGIF does not constitute "no comment" nor does it imply support of the project or associated activities. It simply means VDGIF has not been able to respond to your request.

To assist you in determining which, if any, wildlife resources under our jurisdiction, including threatened and endangered wildlife, may be present on or near your project site, we recommend that you access the Virginia Fish and Wildlife Information System (VAFWIS) at <http://vafwis.org/fwis/>.

If you should have further questions or need additional information about VDGIF's Environmental Programs, please visit: <http://www.dgif.virginia.gov/environmental-programs/>.

Please feel free to attach a copy of this correspondence and any reports from VAFWIS with your project paper work to document your correspondence with us regarding this project.

Thank you,

A handwritten signature in black ink, appearing to read "Shirl", followed by a long horizontal line extending to the right.

Shirl Dressler, Program Support Technician
Environmental Services Admin.

From: Warren, Arlene [<mailto:arlene.warren@vdh.virginia.gov>]
Sent: Monday, April 9, 2018 2:33 PM
To: Rayfield, Bettina <bettina.rayfield@deq.virginia.gov>; DOT BRT <DOTBRT@fairfaxcounty.gov>
Subject: Re: Richmond Highway BRT Project Scoping Request

Project Name: Richmond Highway BRT Project Scoping Request

Project #: N/A

UPC #: N/A

Location: Fairfax County

VDH – Office of Drinking Water has reviewed the above project. Below are our comments as they relate to proximity to **public drinking water sources** (groundwater wells, springs and surface water intakes). Potential impacts to public water distribution systems or sanitary sewage collection systems **must be verified by the local utility.**

There are no public groundwater wells within a 1-mile radius of the project site.

There are no surface water intakes located within a 5-mile radius of the project site.

The project is not within the watershed of any public surface water intakes.

There are no apparent impacts to public drinking water sources due to this project.

Best Regards,

Arlene Fields Warren
GIS Program Support Technician
Office of Drinking Water
Virginia Department of Health
109 Governor Street
Richmond, VA 23219
(804) 864-7781

The Virginia Department of Health – Office of Drinking Water appreciates the opportunity to provide comments. If you have any questions, please let me know.

On Tue, Apr 3, 2018 at 4:15 PM, Rayfield, Bettina <bettina.rayfield@deq.virginia.gov> wrote:
Please find DEQ-OEIR's response attached.

Ms. Bettina Rayfield

Manager

Environmental Impact Review and Long Range Priorities Program

[804.698.4204](tel:804.698.4204)

Bettina.rayfield@deq.virginia.gov



*****Virginia Department of Environmental Quality - Central Office has moved*****

Department of Environmental Quality

1111 East Main Street, Suite 1400

Richmond, Virginia 23219

Mailing address

Post Office Box 1105

Richmond, Virginia 23218

www.deq.virginia.gov

For program updates and public notices please subscribe to the [OEIR News Feed](#)

From: Flanders, Kyle [<mailto:kyle.flanders@dhcd.virginia.gov>]
Sent: Thursday, April 12, 2018 11:59 AM
To: DOT BRT <DOTBRT@fairfaxcounty.gov>
Subject: Re: Richmond Highway Bus Rapid Transit Comments

To Whom It May Concern:

DHCD stakeholders have advised that there is at least one homeless shelter in the southern portion of the project area. Additionally, it was noted that there may be scattered site permanent supportive housing along the route. Generally, stakeholders expressed support for more efficient and effective transportation but did also advise that some residents and constituents along the proposed route had concerns regarding the affordability of housing in the future.

Sincerely,

Kyle T. Flanders

Senior Policy Analyst

Virginia Department of Housing and Community Development

Policy Office

600 E. Main St. Suite 300

Richmond, VA 23219

phone: (804) 786-6761

fax: (804) 371-3090

kyle.flanders@dhcd.virginia.gov

From: Dutton, Sophia
Sent: Thursday, June 21, 2018 9:07 AM
To: Ricklin, Anna <Anna.Ricklin@fairfaxcounty.gov>; Aguayo, Vanessa <Vanessa.Aguayo@fairfaxcounty.gov>; Miller, Douglas <Douglas.Miller3@fairfaxcounty.gov>; Gregory, Michelle <Michelle.Gregory@fairfaxcounty.gov>; Krafchek, Alexandra <Alexandra.Krafchek@fairfaxcounty.gov>
Cc: Yetman, John <John.Yetman@fairfaxcounty.gov>; Arndt, Sharon <Sharon.Arndt@fairfaxcounty.gov>
Subject: RE: Information from Health/HHS re: BRT

Hi Everyone,

The attached spreadsheet contains data aggregated to a 1-mile radius around the proposed BRT bus stops in Fairfax County as well as data from two questions from the 2016 Fairfax County Youth Survey from selected high school pyramids in the same area. Please let me know if you have any questions about the data.

Best regards,
Sophia Dutton, MBA
Health & Human Services
Phone: (703) 324-5134

From: Ricklin, Anna
Sent: Saturday, June 16, 2018 7:58 PM
To: Aguayo, Vanessa <Vanessa.Aguayo@fairfaxcounty.gov>; Miller, Douglas <Douglas.Miller3@fairfaxcounty.gov>; Gregory, Michelle <Michelle.Gregory@fairfaxcounty.gov>; Krafchek, Alexandra <Alexandra.Krafchek@fairfaxcounty.gov>; Dutton, Sophia <Sophia.Dutton@fairfaxcounty.gov>
Cc: Yetman, John <John.Yetman@fairfaxcounty.gov>; Arndt, Sharon <Sharon.Arndt@fairfaxcounty.gov>
Subject: Information from Health/HHS re: BRT

Hi everyone,

I want to be sure to link you all before I disappear for maternity leave.

- Vanessa and Doug are at FCDOT and leading the NEPA application for the BRT project.
- Michelle, Sophia, and Alex are leading a number of data initiatives with HHS and are helping pull some of the requested information together.
- John and Sharon are with the Health Dept – John is providing some of the information around traditional environmental impacts, and Sharon has been working on related issues for several years now and is a great resource for thinking about health impacts. She is also helping keep track of some of the work I've been involved in, so please be sure to copy her on things.

I really appreciate all the support you all have offered and will be in touch through this week as far as I make it! Otherwise, I'll be back online in September.

cheers,

Anna Ricklin, MHS, AICP
Health in All Policies Manager
Fairfax County Health Department
10777 Main Street
Fairfax, VA 22030
(703) 246-8969 / cell (703) 859-0858
www.fairfaxcounty.gov/health

Proposed Bus Stop	Total Population	Number of Households	Median Age	Percent Population 65+	Percent Population 75+	Percent White	Percent Black	Percent Asian/PI
South County Center	24,791	8,121	34.5	10.1	3.7	37.6	30.6	8.3
Telegraph Road (Pohick Rd N)	10,521	3,829	35.7	10.0	5.2	40.1	27.7	17.1
Hybla Valley	23,958	8,381	32.7	9.4	3.4	35.3	31.9	8.2
Gunston Road	8,503	2,565	33.6	6.0	1.5	29.1	34.8	23.6
Lockheed Boulevard	19,096	6,863	34.3	9.8	3.5	40.5	27.9	9.6
Penn Daw	21,963	8,913	38.7	13.8	5.2	58.2	15.4	9.0
Lorton Station Road (Lorton Rd)	14,825	4,992	34.0	6.6	2.2	32.9	32.4	20.5
Huntington	22,933	11,130	36.9	12.3	4.5	62.0	14.2	9.9
Fort Belvoir	789	235	28.5	3.4	1.4	49.3	33.2	5.6
Woodlawn	14,559	5,008	32.7	8.2	2.8	44.6	28.2	8.2
Gum Springs (1)	22,032	7,674	34.2	10.9	4.4	37.2	31.5	8.3
Beacon Hill	21,612	7,569	36.1	10.8	3.9	50.7	20.2	8.4

Esri Community Profile Report - 2017

Esri ACS Population Summary Report - 2011-2015

Esri ACS Housing Summary - 2011-2015



Data Source

High School Pyramid	Percent Students Reporting Extracurricular Activities Available in Community	Percent Students Reporting Feeling Safe in Their Neighborhood
Edison	90.6	90.4
Hayfield	91.4	90.0
Mount Vernon	89.4	81.5
South County	96.4	92.5
West Potomac	91.5	86.7

Data source: 2016 Fairfax County Youth Survey, Overall (8th-, 10th-, and 12th-grades)

Percent Other/Multi Race	Percent Hispanic	Median Household Income	Percent Households Below Poverty	Percent Households with 1+ Person with a Disability	Percent Households with No Vehicle	Percent Population with No Health Insurance	Percent Population with no High School Diploma	Percent Population with HS/GED	Percent Population with Some College	Percent Population with Bachelor's, Graduate, or Professional Degree
23.6	35.1	72,133	12.0	19.4	8.6	23.6	21.9	23.3	23.2	31.5
15.0	19.2	98,543	4.2	19.2	4.4	9.1	5.0	15.7	27.6	51.7
24.5	36.2	54,142	16.1	18.4	13.2	21.7	28.3	21.1	21.0	29.5
12.5	17.0	82,155	5.0	17.8	5.1	10.6	4.3	18.0	32.5	45.1
22.0	33.1	62,103	10.8	15.9	10.5	19.2	24.1	16.3	23.8	35.8
17.5	27.8	80,508	7.0	14.4	6.1	15.4	10.8	15.0	19.3	54.9
14.1	18.6	84,691	4.9	18.4	3.6	9.6	4.4	16.0	30.8	48.8
13.9	20.8	93,917	4.3	10.8	6.6	8.8	6.0	10.4	16.9	66.7
11.9	13.3	43,438	34.0	8.6	0.5	12.9	1.5	18.8	45.1	34.6
19.0	28.5	75,904	9.4	17.3	7.0	19.9	19.2	18.6	27.4	34.8
23.0	33.6	63,575	15.6	20.3	12.6	21.6	23.6	21.4	22.8	32.2
20.7	32.8	77,704	9.0	14.5	9.2	18.8	16.8	16.4	21.6	45.2

Unemployment Rate	Percent Age 5+ with Limited English Proficiency	Median Home Value	Percent Vacant Housing Units	Percent Renter Occupied Housing	Percent Burdened Renters (30%+ of Gross Income)
4.1	10.8	376,218	6.5	41.9	58.3
4.7	8.1	401,950	5.3	45.8	45.5
3.7	14.8	387,469	6.3	57.3	59.1
5.6	6.4	402,762	4.2	38.5	37.8
3.5	14.7	404,214	6.0	55.4	56.5
2.8	7.1	420,251	6.3	43.3	36.5
5.4	7.5	386,111	4.4	42.8	45.7
2.0	3.4	411,679	9.2	54.2	33.3
13.6	0.5	350,000	6.4	86.9	65.7
5.6	5.4	410,350	8.5	51.6	57.7
3.4	12.2	383,595	6.9	47.9	59.6
3.3	10.9	428,722	3.9	45.9	54.1

From: Rayyan, Ahmed
Sent: Monday, May 7, 2018 4:05 PM
To: Miller, Douglas <Douglas.Miller3@fairfaxcounty.gov>
Cc: DOT BRT <DOTBRT@fairfaxcounty.gov>
Subject: Richmond Highway Bus Rapid Transit Program

Good afternoon Doug,

Attached is a CDP/FDP for our North Hill (NH) Project in response to your request for information that can be incorporated into the Categorical Exclusion being prepared for the BRT program. The NH site is located at the corner of Route 1 and Dart Drive. The site is being redeveloped via a PPEA agreement. The project has been awarded Low Income Housing Tax Credit. The developer of the project is in the process of finalizing the site plans for submission to the County. The scope of the NH project includes the construction of approx. 280 affordable multifamily units on the western portion of the property and 150 to 175 market rate townhouses in the southeast portion of the property. Completion of the NH project is anticipated by the end of 2021.

As you can see from the attached CDP/FDP, the R/W dedication has been included as part of the rezoning approval. For the record, the geometry of R/W dedication was coordinated by the developer with FCDOT. And therefore, I suspect that the BRT program impact was taken into account when determining the amount of the R/W dedication. However, I wanted to make sure that the BRT record includes that fact.

Also, the Fairfax County Redevelopment and Housing Authority owns multiple properties along Route 1 where affordable housing is located. The 2nd attachment is a graphic showing the locations of those properties. I respectfully request that the BRT program decision makers will take into account the locations of the affordable housing (where potentially a high number of BRT users come from) when deciding on locations of BRT stations.

Please let me know if you have any questions. Thank you.

Ahmed I. Rayyan, P.E., Director

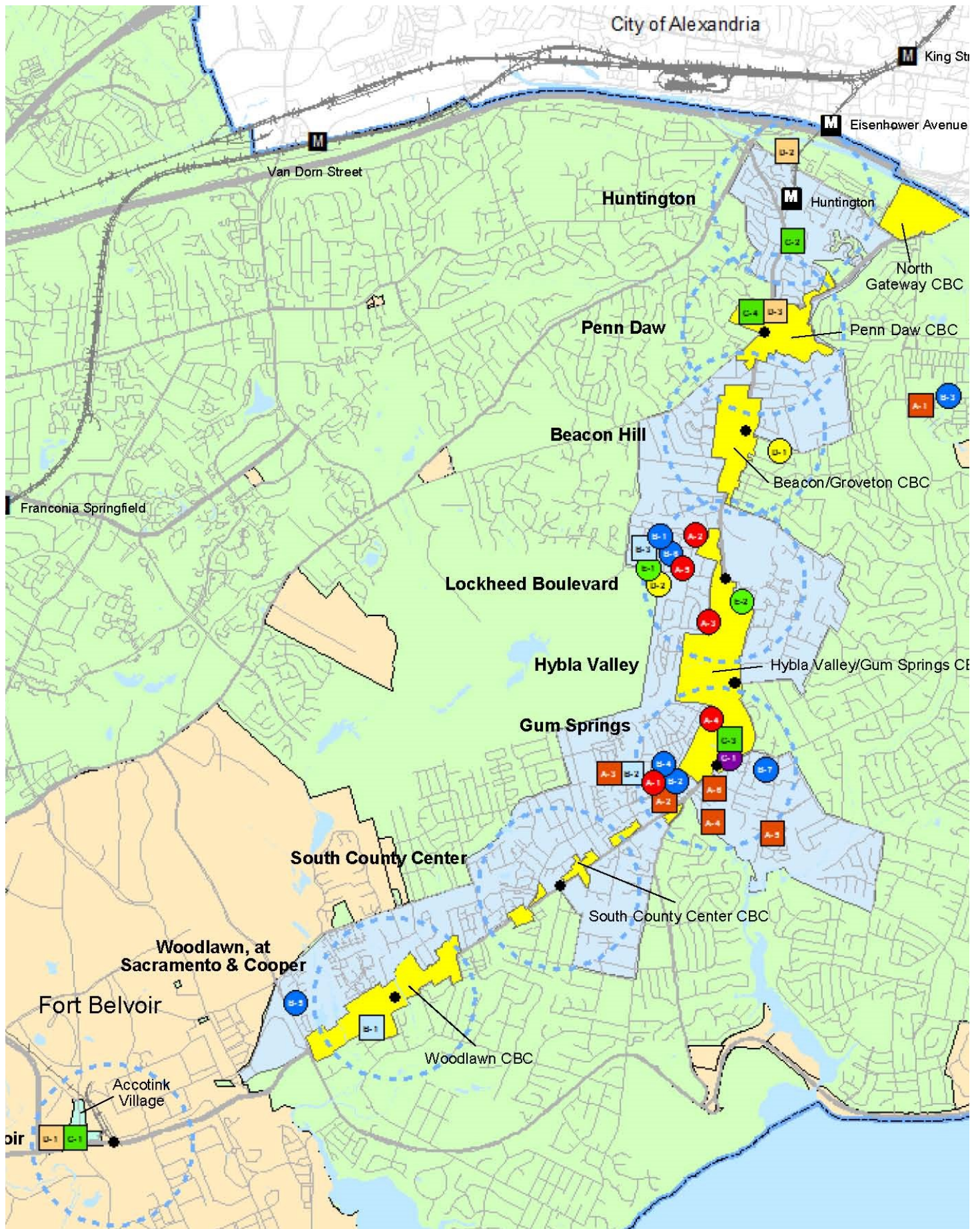
Design, Development & Construction Division

Department of Housing and Community Development

703.246.5123 (D), 571.331.6373 (C), 703.246.5267 (Main), 703.653.7130 (Fax)

ahmed.rayyan@fairfaxcounty.gov – www.fairfaxcounty.gov

Enlarged View of Affordable Housing Along the Rout 1 Corridor



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MONTELEONE OF VIRGINIA
Bob

CC JOHN C. LEVTOV VI
Lic. No. 33635
1/27/17
PROFESSIONAL ENGINEER

PROFESSIONAL ENGINEER

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FAIRFAX COUNTY PARK AUTHORITY



12055 Government Center Parkway, Suite 927 • Fairfax, VA 22035-5500
703-324-8700 • Fax: 703-324-3974 • www.fairfaxcounty.gov/parks

April 20, 2018

Vanessa Aguayo, PE
Project Manager
Capital Projects & Traffic Engineering Division
Fairfax County Department of Transportation
4050 Legato Road, Suite 400
Fairfax, VA 22033

Subject: Project Number 400-C40013
Richmond Highway Bus Rapid Transit Program
Fairfax County, VA

Dear Ms. Aguayo:

Fairfax County Park Authority staff has completed a very high-level review of the above referenced project. Your letter of March 26, 2018, as well as the Bus Rapid Transit (BRT) project webpage, provided little in terms of detail as to the ultimate alignment of Richmond Highway or the extent of the envisioned impacts. At this early stage of the planning process, our analysis has been based on the existing centerline of Richmond Highway and the 178' right-of-way considered in the Embark Comprehensive Plan Amendment that would accommodate widening Richmond Highway and the median-running BRT system.

With the assumptions noted above, it does not appear that the planned BRT project would entail direct impacts to parkland. The North Hill site (located at the northeast corner of Richmond Highway and Dart Drive) is currently owned by the Fairfax County Redevelopment and Housing Authority (FCRHA). Pursuant to RZ 2016-MV-014, FCRHA will dedicate approximately twelve acres of land to the Park Authority. The envisioned Richmond Highway improvements were anticipated with this application, therefore, no additional impacts are expected. Should, however, the final alignment and planned improvements for Richmond Highway result in direct impacts to parkland, the Park Authority would request that the Fairfax County Department of Transportation (FCDOT) and/or the Virginia Department of Transportation (VDOT) coordinate with the Park Authority to minimize impacts to environmental resources (as well as other concerns such as the preservation of acceptable access) and that mitigation be provided whenever direct impacts cannot be avoided.

Whereas the proximity of parkland to Richmond Highway indicates only limited potential for direct impacts, modifications to the design and construction of Richmond Highway has a significant potential to cause indirect impacts to parkland. Based on the general topographic



If accommodations and/or alternative formats are needed, please call (703) 324-8563, at least 10 working days in advance of the registration deadline or event. TTY (703) 803-3354.

elevation of this portion of the county and the proximity to the Potomac River, much of the land along the Richmond Highway corridor is sensitive to changes in hydrology. Rare species and habitats in parks on the northwest side of Richmond Highway, such as Huntley Meadows and Pole Road Parks, could be irreparably damaged by being disconnected from tidal influences. Changes in overall water levels could have similar impacts, whether water is impounded upstream of Richmond Highway or sites are dewatered from increased release rates. For hydrologically sensitive parkland east of Richmond Highway, such as the various stream valley park connections, constriction of water flow at Richmond Highway could "starve" these waterways and result in significant impacts to the habitat and water-dependent species. Any redesign of Richmond Highway, whether for FCDOT planned BRT improvements or for VDOT planned widening efforts, should very carefully consider the area's hydrology and environmental sensitivity, and not solely focus on the conveyance of storm flow. On a broader spectrum, for any changes in the structural design of Richmond Highway, particularly at stream crossings, the Park Authority would request consideration of solutions that encourage wildlife passage.

In addition to concerns regarding the environment, the Park Authority is also charged with protection of cultural resources with the county's historic overlay districts as well as encouraging the preservation of our county's heritage in areas not expressly covered by the protection of a historic overlay district. The Richmond Highway Corridor is replete with areas that played pivotal roles in our county's history as well as that of the Commonwealth of Virginia and the United States. This project is not required by county statute to perform an archaeological survey. However, for any land area that would be impacted by the planned BRT project which has not previously been surveyed, the Park Authority would request that project efforts be coordinated with the Park Authority's Resource Management Division so that sites that still retain the potential for cultural resources might be investigated prior to disturbance. Particular interest would be within the Woodlawn Historic Overlay District (see attached graphic). To facilitate that coordination, a copy of the Archaeological Survey Data Form is attached for your reference.

The applicant should also be aware that there are specific archaeological requirements under Section 106 of the National Historic Preservation Act, which are associated with federally licensed or funded development. If Section 106 applies then any archaeological work under this recommendation should also be coordinated in advance with the Virginia State Historic Preservation Officer (SHPO).

The Park Authority appreciates the opportunity to comment on this project and looks forward to further coordination as the Bus Rapid Transit project advances.

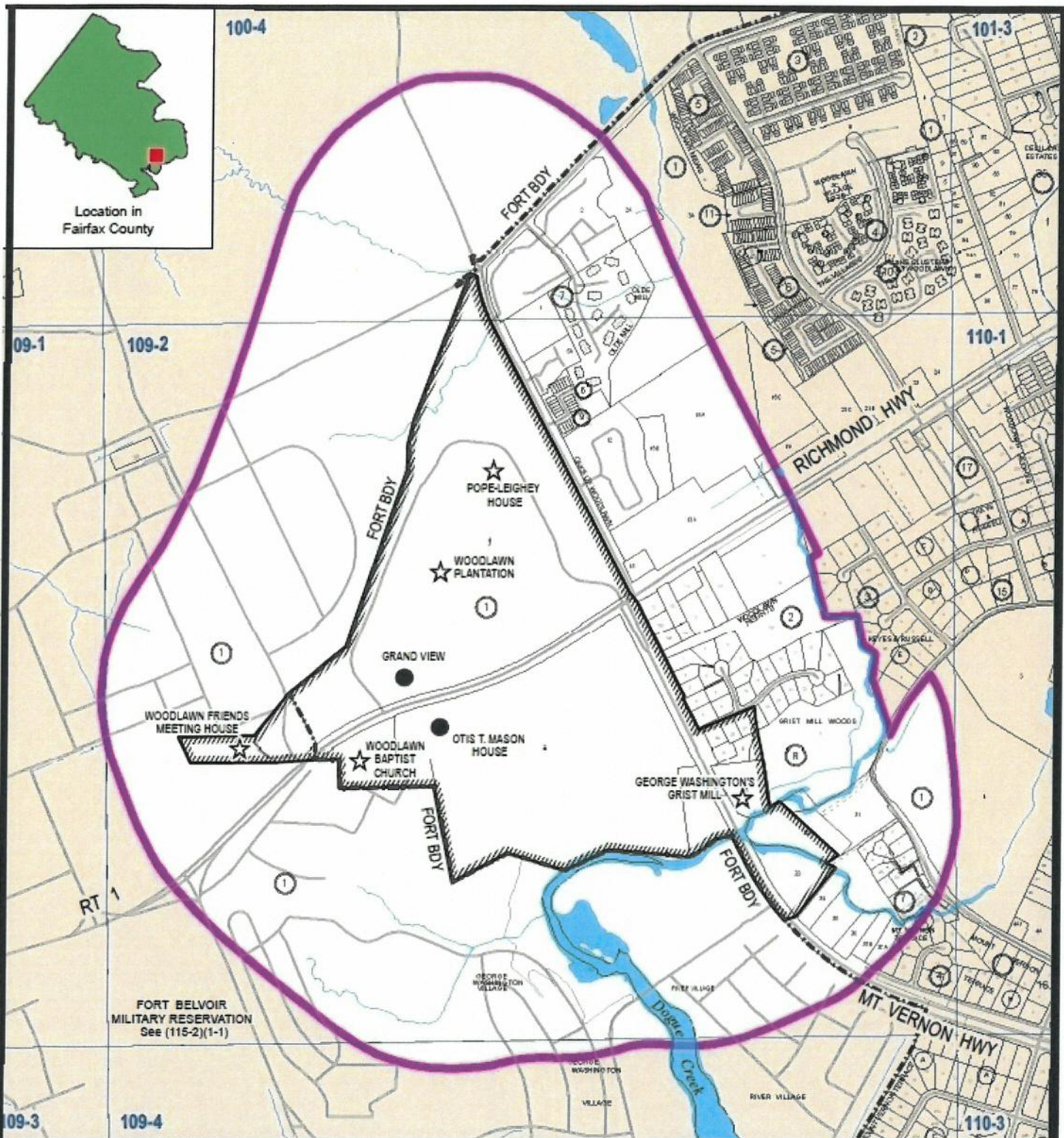
Sincerely,



Kirk W. Kincannon
Executive Director

Attachments

Copy: Dan Storck, Supervisor, Mount Vernon District
Jeff McKay, Supervisor, Lee District
Linwood Gorham, FCPA Board Representative, Mount Vernon District
Cynthia Carter, FCPA Board Representative, Lee District
Sara Baldwin, Deputy Director/COO, FCPA
Aimee Vosper, Deputy Director/CBD, FCPA
Cindy Walsh, Director, Resource Management Division, FCPA
John Stokely, Manager, Natural Resource Protection Branch, FCPA
Liz Crowell, Manager, Cultural Resource Protection Branch, FCPA
David Bowden, Director, Planning and Development Division, FCPA
Andi Dorlester, Manager, Park Planning Branch, FCPA



WOODLAWN

HISTORIC OVERLAY DISTRICT

FAIRFAX COUNTY, VA

Adopted by the Board of Supervisors 1971

Supervisor District: Mount Vernon

Planning Area and District: Area IV, Mount Vernon, Lower Potomac

Community Planning Sectors: MV7 Mount Vernon, MV8 Woodlawn, LP4 Fort Belvoir

Map data current to February 2009

Map prepared by Planning Division,
Department of Planning & Zoning

Legend

- ☆ Historic Property
- Contributing Property
- ▨ District Core Boundary
- ▬ District Boundary

0 1000 FEET

Archaeological Survey Data Form – Part A

In order to determine the existing on-site conditions, the following information must be provided to the Cultural Resource Management and Protection Section of the Fairfax County Park Authority, James Lee Community Center 2855 Annandale Road, Room 124, Falls Church, VA, 22042, prior to submission of any rezoning, development plan, special exception, special permit or variance application that involves 2500 square feet or more of land disturbing activity and where the application property is located wholly or partially within or contiguous to a Historic Overlay District. Following the County's review of available files and GIS information for the application property, a determination will be made as to the probability of the application property to yield significant archaeological resources. The Cultural Resource Management and Protection Section will reply to the applicant within fifteen (15) working days of receipt of the following required information:

APPLICANT	Name
	Mailing Address
	Phone Home () Work () Mobile ()
PROPERTY INFORMATION	Property Address
	Tax Map and Parcel Number: Size (acre/sq.ft.)
	Zoning District: Magisterial District
	Proposed Zoning if concurrent with rezoning application:
HISTORIC OVERLAY DISTRICT ARCHAEOLOGICAL SURVEY REQUEST INFORMATION	Provide the following: One (1) copy of the current Fairfax County Zoning Section Sheet(s) at a scale of one inch equals five hundred feet (1" = 500'), covering the area within at least a 500 foot radius of the proposed use, showing the existing zoning classification for all land appearing on the map. If more than one (1) Zoning Section Sheet is required to cover the area, such sheets shall be attached so as to create an intelligible map. The boundaries of the subject site shall be outlined in red thereon.
	Description of the proposal including type of application and proposed use, and a graphic drawn to scale showing the dimensions of all existing buildings and their distance from property lines (attach additional sheets, as necessary):
AGENT/CONTACT INFORMATION	Name
	Mailing Address
	Phone Home () Work () Mobile ()
MAILING	Send all correspondence to (check one): ___ Applicant or ___ Agent/Contact
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">Type/Print Name of Applicant</div> <div style="width: 45%;">Signature of Applicant/Agent</div> </div>	

FOR OFFICIAL COUNTY USE ONLY

Date all required information received: _____

No probability. No Survey Required. _____

Low probability. Survey Required (see Sect. 7-210 of the Zoning Ordinance): _____

Medium to high probability. Survey Required (see Sect. 7-210 of the Zoning Ordinance): _____

Comments (attach additional sheets, if necessary): _____

Date of response to applicant: _____

Archaeological Survey Data Form – Part B

If the Cultural Resource Management and Protection Section of the Fairfax County Park Authority determines that a Survey is required and a report of the survey results must be submitted prior to submission of any rezoning, development plan, special exception, special permit or variance application that involves 2500 square feet or more of land disturbing activity and where the application property is located wholly or partially within or contiguous to a Historic Overlay District, then a copy of the Executive Summary contained in the report must be printed in the space below (attach additional sheets if necessary). (See Par. 6L of Sect. 7-210 of the Zoning Ordinance.)

EXECUTIVE SUMMARY:

I certify that the above Executive Summary is a true copy of the Executive Summary contained in the Report dated _____ submitted to the Cultural Resource Section.

Type/Print Name of Applicant

Signature of Applicant/Agent and Date

FOR OFFICIAL COUNTY USE ONLY

Date of Report submitted to the Park Authority _____

Report submitted and meets submission requirements. Staff recommendation forthcoming: _____

From: Washington, Pallas
Sent: Tuesday, May 8, 2018 3:06 PM
To: DOT BRT <DOTBRT@fairfaxcounty.gov>
Cc: Aguayo, Vanessa <Vanessa.Aguayo@fairfaxcounty.gov>
Subject: BRT Categorical Exclusion

To whom it may concern,

Neighborhood and Community Services in conjunction with the Region 1 Regional Change is submitting the following information as potential environmental resource impacts associated with the BRT program. Below you will find comments addressing issues, interests and/or concerns regarding natural, cultural, and socioeconomic resources within the project corridor. Additionally, information regarding possible future developments and the potential for indirect and cumulative effects are included.

Region 1 Change Team- BRT Impacts Input:

Natural resources

- ~ Safe, protected trails, walk-ways and access
- ~ Commuter parking and bike storage
- ~ Protect run off-watershed
- ~ Increase green space
- ~ Eco friendly buses-high/low exhaust
- ~ Beautification process- no eyesores

Cultural resources

- ~ No access to other areas in the county (East/West/North County)
- ~ Consider the large number of pedestrian traffic in the region.
- ~ Engage a Cross-section of all residents.
- ~ Relook into where people can actually board the bus, make sure they are close to heavily populated sections of the corridor like apt. complexes
- ~ Consider having community rooms or spaces within CBC's and close to bus stations.

Socioeconomic resources

- ~ Be aware of the removal of local business that are vital to local residents. Partner with business to rebuild.
- ~ Engage business to support and address affordability issues

- ~ Concern that this is only to transport people and take away space, not really good for those who live here.
- ~ With revitalization, home prices will go up and people will not be able to afford to live here.
- ~ CBC's close to schools
- ~ Look at ADU's requirements as part of the project
- ~ Analyze how the Governor's Opportunity Zones will affect the BRT project and is there an opportunity for this initiative to have a positive impact (The Federal Tax Cuts and Jobs Act of 2017 included provisions for a new revitalization tool, the Opportunity Zone and Opportunity Fund. Broadly speaking, the Zones and Funds will allow investors to receive tax benefits on currently unrealized capital gains by investing those gains in qualified census tracts (Opportunity Zones). While the federal government is responsible for defining the investment process, the Governor of each state may nominate 25 percent of qualified census tracts as "Opportunity Zones.")
- ~ Contract with local business, informing them of RFP opportunities and market to local businesses.
- ~ Plans for developers to give or support for community needs

Unintended consequences

- ~ Bring jobs
- ~ Opportunity to engage in Community Wealth Building – increase living wage
- ~ Increase connection to DC but not county- this creates a socioeconomic split
- ~ Injuries and fatalities. There are already too many pedestrian deaths on Richmond Hwy.
- ~ Increase pedestrian flashers/Pedestrian bridges for CBC access
- ~ Pedestrian Crosswalks are far from each other and there are not that many.
- ~ Ensure safety of pedestrians
- ~ No access to Lorton. Right now it takes about 2 hrs. For most people that live in Lorton, they have to transfer to get to near places where they work.

Future Development

- ~ Liberty Apartments
- ~ McShay construction -Townhomes
- ~ Metro/ Yellow line

If you have any questions, please let me know. Thank you for your keen attention to this matter.

Pallas Washington, MPA
 Region 1 Manager
 Department of Neighborhood and Community Services
[8350 Richmond Highway, Suite 505](#)
[Alexandria, VA 22309](#)
[703-704-6730](#) office
[703-704-6797](#) fax
 711 TTY
www.fairfaxcounty.gov/ncs

From: Sneed, Kevin [<mailto:kmsneed@fcps.edu>]
Sent: Thursday, April 12, 2018 4:05 PM
To: DOT BRT <DOTBRT@fairfaxcounty.gov>
Cc: Austin, Carla <cjaustin@fcps.edu>
Subject: Richmond Highway Bus Rapid Transit Program - FCPS Response

Ms. Aguayo and Mr. Miller,

Fairfax County Public Schools has received your letter requesting comment regarding the Richmond Highway Bus Rapid Transit Program.

After review by the Design & Construction Office, FCPS has no comments or objections regarding the proposed project.

Thank you for sending the letter and requesting a review.

Kevin Sneed
Special Projects Administrator
Design + Construction/Planning
571 423-2280

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FAIRFAX COUNTY WATER AUTHORITY
8560 Arlington Boulevard, Fairfax, Virginia 22031
www.fairfaxwater.org

**PLANNING & ENGINEERING
DIVISION**

Jamie Bain Hedges, P.E.
Director
(703) 289-6325
Fax (703) 289-6382

April 30, 2018

Vanessa Aguayo, PE
Capital Projects and Traffic Engineering Division
Fairfax County Department of Transportation
4050 Legato Road, Suite 400
Fairfax, VA 22033

RE: Richmond Highway BRT Project

Dear Ms. Aguayo:

Fairfax Water has completed its review of the Richmond Highway Bus Rapid Transit Program – existing facilities and planned improvements along the corridor are documented below.

Existing facilities include:

- Water mains, ranging in size from 3 to 24-inches in diameter.
- Beacon Hill Water Storage Tank (off Southgate Drive).
- Gum Springs Storage Tanks and Pumping Station (Fordson Road).
- Groveton Storage Tank (not in service).

Future necessary system improvements were identified as part of the 2011 update to the System Master Plan. Projects along Richmond Highway include:

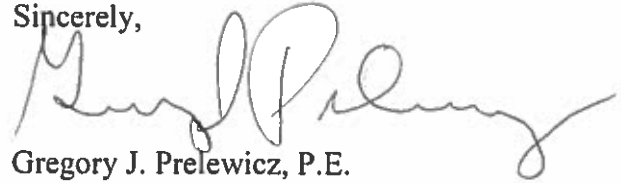
- Extension of existing transmission water main from Route 1 at Quander Road to Huntington Avenue; up Huntington Avenue to Telegraph Road.
- Replacement and oversize of existing water mains along Route 1; from Woodlawn to Alexandria, concurrent with redevelopment activities.
- Construction of an additional water storage tank at the Beacon Hill site.
- Improvements to the Gum Springs Pump Station, including installation of at least two new pumps.

Additional transmission system requirements to better serve the area may be identified as future land use modifications are formulated and adopted. Local distribution needs are typically determined based on fire flow requirements and are implemented concurrent with development.

Vanessa Aguayo, PE
April 30, 2018
Page 2 of 2

Should you have any questions or require additional information, please contact me at (703) 289-6318.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregory J. Prelewicz', with a long, sweeping horizontal stroke extending to the right.

Gregory J. Prelewicz, P.E.
Manager, Planning



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

June 4, 2018

Vanessa Aguayo, P.E.
Transportation Planner III
Capital Projects & Traffic Engineering Division
Fairfax County
Department of Transportation

Dear Ms. Aguayo:

This letter is in response to your request for Categorical Exclusion (CE) comments for the proposed Richmond Highway Bus Rapid Transit (BRT) system and widening project. Based on the best available preliminary information for the BRT there are a number of areas of concern or potential concern related to environmental impacts within the Richmond Highway Corridor.

The proposed widening of the existing right-of-way and addition of the BRT system to this environment will likely have an impact on transportation-generated noise conditions within the Richmond Highway Corridor. This portion of the Richmond Highway Corridor is traveled by thousands of vehicles on a daily basis. The Comprehensive Plan includes guidance regarding acceptable levels of transportation-generated noise impacts on residential and other noise sensitive uses. This guidance is based on both Federal Highway Administration guidance and guidance from the Department of Housing and Urban Development for accepted noise standards for impacts to outdoor activity areas and indoor spaces in dwellings and other noise-sensitive uses. Noise levels exceeding 65 dBA DNL are likely to impact land immediately adjacent to this right-of-way and, in some instances, the noise levels located within closest proximity to the right-of-way have been measured at over 75 dBA DNL. Noise levels in excess of 75 dBA DNL are considered unsuitable for residential development. Policy Plan guidance notes that exterior activity areas should have a noise level no greater than 65 dBA DNL and the interior areas of residential and other noise sensitive uses should have a noise level no greater than 45 dBA DNL. These guidelines can be based on measured conditions for the existing noise for a given location, but should include a minimum twenty-year projected noise level for the same location. In those instances where noise levels will be projected to exceed 65 dBA DNL for proposed outdoor activity areas or 45 dBA DNL for the interior areas of proposed residences or other noise sensitive uses, mitigation measures should be applied. As part of any evaluation of potential environmental impacts for this area, special consideration should be given to noise impacts upon existing and proposed development within the corridor. It may also be appropriate to consider mitigation measures as part of the proposed scope of work in order to mitigate exterior noise impacts upon residential development, park spaces and usable open space as well as other noise-sensitive uses.

This segment of Richmond Highway covers portions of the Belle Haven, Little Hunting Creek and Dogue Creek watersheds. The Richmond Highway Corridor includes existing stream crossings. Resource Protection Areas (RPA) and Environmental Quality Corridors (EQC) areas serve as the buffers for streams in Fairfax County and the existing crossings bisect these buffer areas. Any proposals which consider or include improvements or expansions of these existing stream crossings should also take into consideration the short-term and long-term impacts as well as potential mitigation measures which might be employed. New stream crossings should be discouraged, unless there is a clearly demonstrated need based on public safety issues.

The BRT concept for the Richmond Highway Corridor envisions multi-modal transportation goals to be met in conjunction with new development or redevelopment within designated areas of the corridor. The Public Facilities Manual (PFM) serves as the primary guiding document for stormwater management requirements. Under current PFM standards for public uses, it is possible that there could be redevelopment project scenarios for which the required levels of stormwater management would be considerably less stringent than what would be required for similar private development projects on land area which otherwise had no prior development. The introduction of the BRT system within this corridor will result in a widening of the existing right-of-way, expansion of impervious surfaces areas and, as a result, increased runoff from the resulting impervious surface areas. Measures to provide for effective stormwater management controls for development of the BRT and associated right-of-way improvements should ensure that these projects would not create or aggravate adverse impacts to streams and could aid in the reversal of the adverse impacts associated with past practices; such measures should be part of the consideration for the corridor.

If you have any questions about our comments, please feel free to contact John Bell, at 703-324-1278. Thank you for offering us this opportunity to provide guidance regarding issues of concern.

Sincerely,



Marianne R. Gardner, Director
Planning Division
Department of Planning and Zoning

MRG/JRB

cc: Meghan Van Dam, Chief, Department of Planning & Zoning
Douglas Miller, Fairfax County Park Authority
John R. Bell, Department of Planning & Zoning



COMMONWEALTH of VIRGINIA

Jennifer L. Mitchell
Director

DEPARTMENT OF RAIL AND PUBLIC TRANSPORTATION
600 EAST MAIN STREET, SUITE 2102
RICHMOND, VA 23219-2416

(804) 786-4440
FAX (804) 225-3752
Virginia Relay Center
800-828-1120 (TDD)

July 23, 2018

Ms. Vanessa Aguayo
Fairfax County Department of Transportation
4050 Legato Road, Suite 400
Fairfax, VA 22033

Project: Richmond Highway Bus Rapid Transit Project
Fairfax County, VA
Project Number: 400-C40013

Dear Ms. Aguayo:

Thank you for the opportunity to provide comments on the Richmond Highway Bus Rapid Transit (BRT) project for consideration by Fairfax County during the preparation of its Categorical Exclusion for the project.

The Virginia Department of Rail and Public Transportation (DRPT) strongly supports the Richmond Highway BRT project. As we work with our partners to improve the mobility of the citizens of Virginia, we recognize it is important to provide multiple travel choices to people trying to reach destinations in congested corridors like Richmond Highway. The Richmond Highway BRT project will add much needed capacity for moving people in the corridor and will ultimately allow the entire transportation system in that area to support the anticipated high levels of employment and residential growth.

DRPT has been working closely with Fairfax County's Department of Transportation (FCDOT) on the development of the Richmond Highway BRT. As you know, DRPT, in coordination with FCDOT developed the Route 1 Multimodal Alternatives Analysis. As a result of that study, the project team recommended BRT as the preferred alternative in the corridor.

The Route 1 Multimodal Alternatives Analysis included an environmental scan which identified the following potential environmental constraints and effects associated with the Richmond Highway BRT project.

Socio-Economics and Environmental Justice

In consideration of the existing communities and their populations within the study area, many of which are considered to be low-income and minority, Title VI and Environmental Justice (EJ) concerns will be a factor in the future NEPA process. Community analysis and impact assessment should identify whether disproportionately high and adverse effects to EJ populations are anticipated and avoid and/or mitigate those effects. FCDOT should also ensure a concerted effort is made to include EJ populations in public outreach efforts.

Water Resources

It should be noted that temporary indirect impacts on streams, wetlands, and storm water management resources could result from construction-related activities. During construction, proposed improvements will be required to comply with applicable federal, state, and local standards. Potential impacts from widening the existing bridge over the Occoquan River will need to be studied.

Property/ROW Impacts

The Richmond Highway BRT will require additional right-of-way and may lead to direct impacts on existing properties and buildings. Potential impacts should be assessed in the NEPA and design phases.

In addition to the environmental factors, it is important to emphasize the need for effective multimodal access to stations. We recognize there are station access issues along the corridor, including the need for connecting transit service and non-motorized travel options, combined with transit oriented development in lieu of park-and-rides. Without transportation capacity improvements that encourage pedestrian and transit travel, it is unlikely that the projected growth can be accommodated within the corridor, and the associated economic opportunity of additional jobs and residents will be limited. The DRPT Multimodal System Design Guidelines should be used as a guide for best practices when developing multimodal corridors.

http://www.drpt.virginia.gov/media/1055/drpt_mmsdg_final_full.pdf

DRPT recognizes the importance of this project to Fairfax County and, in particular, its citizens who travel in the Richmond Highway corridor. The implementation of this project will result in substantial transportation benefits to surrounding communities and will provide overall environmental benefits in terms of air quality and socioeconomic factors.

We look forward to working with Fairfax County as well as other Federal, State and local agencies to ensure the purpose and needs of this project are fulfilled while avoiding and/or minimizing adverse impacts to the environment.

Sincerely,



Jennifer Mitchell
Director

Matthew J. Strickler
Secretary of Natural Resources

Clyde E. Cristman
Director



Rochelle Altholz
Deputy Director of
Administration and Finance

Russell W. Baxter
Deputy Director of
Dam Safety & Floodplain
Management and Soil & Water
Conservation

Thomas L. Smith
Deputy Director of Operations

COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

January 10, 2019

Catherine Cruz-Ortiz
Rummel, Klepper & Kahl, LLP
2600 Fair Lakes Circle, Suite 300
Fairfax, VA 22033

Re: Richmond Highway Bus Rapid Transit

Dear Ms. Cruz-Ortiz:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Accotink Bay – Gunston Cove Stream Conservation Unit is located within and downstream of the project site. Stream Conservation Units (SCUs) identify stream reaches that contain aquatic natural heritage resources, including 2 miles upstream and 1 mile downstream of documented occurrences, and all tributaries within this reach. SCUs are also given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain. The Accotink Bay – Gunston Cove SCU has been given a biodiversity ranking of B5, which represents a site of general significance. The natural heritage resources associated with this site are:

Lampsilis radiata
Glyptemys insculpta

Eastern lampmussel
Wood turtle

G5/S2S3/NL/NL
G3/S2/NL/LT

The Eastern lampmussel is a freshwater mussel which inhabits river systems in areas with substrates composed of silt, sand, cobble, gravel and exposed bedrock (NatureServe, 2009). This species has a wide range, from eastern Canada west to Ontario and Quebec and south to South Carolina (NatureServe, 2009). In Virginia, there are records from the Chowan and York River drainages.

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

The Wood turtle ranges from southeastern Canada, south to the Great Lake states and New England. In Virginia, it is known from northern counties within the Potomac River drainage (NatureServe, 2009). The Wood turtle inhabits areas with clear streams with adjacent forested floodplains and nearby fields, wet meadows, and

farmlands (Buhlmann et al., 2008; Mitchell, 1994). Since this species overwinters on the bottoms of creeks and streams, a primary habitat requirement is the presence of water (Mitchell, 1994).

Threats to the wood turtle include habitat fragmentation, urbanization, and automobile or farm machinery mortality (Buhlmann et al., 2008). Please note that the Wood turtle is currently classified as threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Furthermore, the Accotink Wetlands Conservation Site is located within and downstream of the project site. Conservation sites are tools for representing key areas of the landscape that warrant further review for possible conservation action because of the natural heritage resources and habitat they support. Conservation sites are polygons built around one or more rare plant, animal, or natural community designed to include the element and, where possible, its associated habitat, and buffer or other adjacent land thought necessary for the element's conservation. Conservation sites are given a biodiversity significance ranking based on the rarity, quality, and number of element occurrences they contain; on a scale of 1-5, 1 being most significant. Accotink Wetlands Conservation Site has been given a biodiversity significance ranking of B3, which represents a site of high significance. The natural heritage resources of concern at this site are:

<i>Lathyrus palustris</i>	Marsh pea	G5/S1/NL/NL
<i>Bolboschoenus fluviatilis</i>	River bulrush	G5/S2/NL/NL
<i>Ranunculus ambigens</i>	Water-plantain crowfoot	G4/S1/NL/NL
<i>Carex vestita</i>	Velvet sedge	G5/S2/NL/NL
	Tidal Freshwater Marsh (Mixed High Marsh Type)	G3/S4?/NL/NL
	Coastal Plain / Outer Piedmont Acidic Seepage Swamp	G3?/S3/NL/NL
	Northern Coastal Plain / Piedmont Mesic Mixed Hardwood Forest	G5/S5/NL/NL

In addition, Parker's pipewort (*Eriocaulon parkeri*, G3/S2/NL/NL) has been historically documented downstream of the project site. Parker's pipewort is classified as very rare to uncommon in Virginia. This diminutive pipewort species displays a greyish-white button flower and often occurs with other rare mudwort species in the intertidal zone of tidal regions from Maine to North Carolina. Potential threats include activities that alter natural river currents causing sedimentation, which could inhibit germination of seeds or smother seedlings, and/or erosion of the habitat. Other potential threats include activities that result in increased salinity levels, water pollution, and displacement by aggressive species (J. C. Ludwig, 1996). Parker's pipewort has been documented at 29 occurrences in Virginia with 11 of those historical or extirpated. Surveys for this species should be conducted during the flowering / fruiting period from July to October.

To minimize adverse impacts to the aquatic ecosystem as a result of the proposed activities, DCR recommends the implementation of and strict adherence to applicable state and local erosion and sediment control/storm water management laws and regulations. Due to the legal status of Wood turtle, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

New and updated information is continually added to Biotics. Please re-submit a completed order form and project map for an update on this natural heritage information if the scope of the project changes and/or six months has passed before it is utilized.

A fee of \$120.00 has been assessed for the service of providing this information. Please find attached an invoice for that amount. Please return one copy of the invoice along with your remittance made payable to the Treasurer of Virginia, **DCR - Division of Natural Heritage, 600 East Main Street, 24th Floor, Richmond, VA 23219**. Payment is due within thirty days of the invoice date. Please note the change of address for remittance of payment as of July 1, 2013. Late payment may result in the suspension of project review service for future projects.

The Virginia Department of Game and Inland Fisheries (VDGIF) maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Ernie Aschenbach at 804-367-2733 or Ernie.Aschenbach@dgif.virginia.gov. According to the information currently in our files, Dogue Creek and Unnamed tributary to Dogue Creek, which have been designated by the VDGIF as "Threatened and Endangered Species Waters" for the Wood turtle are within 2 miles of the project site. Therefore, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

Should you have any questions or concerns, please contact me at 804-225-2429. Thank you for the opportunity to comment on this project.

Sincerely,



Tyler Meader
Natural Heritage Locality Liaison

CC: Amy Ewing, VDGIF

Literature Cited

Buhlmann, K., T. Tuberville, and W. Gibbons. 2008. *Turtles of the southeast*. University of Georgia Press. Athens, GA. 252 pp.

Ludwig, J. Christopher. 1996. Personal communication. Virginia Department of Conservation and Recreation, Division of Natural Heritage.

Mitchell, J. C. 1994. *Reptiles of Virginia*. Smithsonian Institution Press, Washington. pp. 88-91.

NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: April 8 and 27, 2010).

Williams, J.D., M.L. Warren, Jr., K.S. Cummings, J.L. Harris, and R.J. Neves. 1993. Conservation status of freshwater mussels of the United States and Canada. *Fisheries* 18: 6-9.

Section 106 Correspondence



U.S. Department
of Transportation

**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1760 Market Street
Suite 500
Philadelphia, PA 19103-4124
215-656-7100
215-656-7260 (fax)

October 4, 2018

Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Section 106 Project Initiation and Proposed Area of Potential Effects - the Richmond Highway Bus Rapid Transit Program, Fairfax County, Virginia

Dear Ms. Birge-Wilson:

The Fairfax County Department of Transportation (FCDOT), in coordination with the Federal Transit Administration (FTA), is proposing to implement bus rapid transit (BRT) service along a nine-mile portion of the Richmond Highway/U.S. Route 1 and North Kings Highway/State Route 241 from Fairfax County Parkway to the Huntington Metro Station (the project). FTA may provide financial assistance to FCDOT, and as such, FTA is initiating consultation with the State Historic Preservation Officer (SHPO), under Section 106 of the National Historic Preservation Act of 1966. This letter serves as the official notification from FTA of the initiation of the Section 106 process and as an invitation to Section 106 consulting parties.

Project Description

The project includes the construction of new BRT-dedicated median lanes; nine BRT stations; roadway widening; streetscape improvements; and accommodations for walkways, trails, and bicycle facilities (see **Attachment A**). The project would operate in both dedicated and mixed traffic lanes within the project limits.

Study Area

The proposed area of potential (APE) for this undertaking was established based on the nature, size and scale of the undertaking defined by the preliminary project corridor (36 CFR Part 800.4(a)(1)). The undertaking is located within a developed, suburban area with commercial, residential, and some light industrial developments. The Richmond Highway portion is dominated by businesses and storefronts, many located within shopping centers. While the North Kings Highway portion also has commercial developments, it is also flanked by numerous single-family residences. The Huntington Metro Station is also located along Kings Highway.

The following approach was taken to delineate the APE, which, including direct effects, accounts for potential visual, atmospheric, or audible elements resulting from the undertaking:

- From the southern extent of the corridor to Ladson Lane, the APE was established as 150 feet from each side of the Richmond Highway/U.S. Route 1 centerline.
- From Ladson Lane to Jamaica Drive, the APE was established as 300 feet from each side of the Richmond Highway/U.S. Route 1 centerline.

- From Jamaica Drive to the Huntington Metrorail System, the APE was established as 125 feet from the Richmond Highway/U.S. Route 1 centerline or the North Kings Highway/State Route 241 centerline.
- The APE encompasses the general area of the Huntington Metrorail Station.

Previously Identified Resources

A total of 135 previously identified resources are located within the APE (see **Attachments C and D**). Of the 135 total resources, 93 have been evaluated and concurred not eligible for listing in the National Register of Historic Places (NRHP) by DHR staff within the last five years. Two of the 135 resources have been updated as demolished by recent surveys. A total of seven resources are NRHP listed or evaluated as eligible, individually or as contributing elements, by DHR staff within the last five years:

- Woodlawn Plantation (029-0056) is listed in the NRHP and Virginia Landmarks Register (VLR). The historic resource is also a National Historic Landmark, with a slightly smaller boundary limited to the north side of Richmond Highway.
- The Woodlawn Cultural Landscape Historic District (029-5181) was evaluated NRHP eligible by DHR staff in 2016.
- The Woodlawn Stables (029-5181-0005) was evaluated individually NRHP eligible by DHR staff in 2017 and is also a contributing resource of 029-5181.
- Mount Vernon High School (029-0230) was evaluated NRHP eligible by DHR staff in 2016.
- The Camp A.A. Humphreys Pump Station and Filter Building (029-0096) is listed on the VLR and is associated with the VLR-listed Fort Belvoir Historic District (029-0209). However, 029-0096 is located outside the boundary of 029-0209 and this district is outside the APE.
- The Fort Belvoir Military Railroad Historic District Corridor (029-5724) was VLR listed in 2016 and evaluated potentially eligible by DHR staff in 2017.
- The Fort Belvoir Military Railroad Track Bed (029-5648) is associated with 029-5724. The railroad was surveyed in 2016 and there was no update to the status of the resource.

The remaining 33 previously identified resources are being recommended for re-evaluation as part of a reconnaissance survey (see **Attachment C**). Background research was conducted to identify properties that will be 50 years of age by the planned Phase II advertisement date of 2025. This resulted in a search for all properties more than 43 years old (built in or before 1975) within the APE (see **Attachments E and F**). Our review included local tax records, historic topographic maps, and historic aerials. The resources identified include a mix of commercial buildings, single-family residences, and apartments/condominiums. A total of 117 newly identified resources are being recommended for reconnaissance survey.

Alternative Survey Strategy for Historic Districts

Standard reconnaissance-level survey methodology can be employed for the majority of resources within the APE; however, there are two concentrations of post-WWII homes located in the northern portion of the APE, to the east and west of North Kings Highway, that appear to constitute two separate potential historic districts (see **Attachments E and F**). An alternative survey strategy is recommended for these areas. The dwellings comprising the potential districts can be surveyed together as a neighborhood district. Separate properties within the district will not be evaluated for individual eligibility. Representative property types in the neighborhood districts can be photographed and the neighborhood design and features documented through written notes and site plans. A single V-CRIS

form can be created for each neighborhood district and recommendations made on the neighborhood's NRHP eligibility as an historic district.

Invited Consulting Parties

FTA and FCDOT are offering the opportunity for you or your organization to participate in consultation pursuant to Section 106 of the National Historic Preservation Act and to provide any comments on the proposed APE (see **Attachment G**). The consulting parties that express interest will be invited to review cultural and archaeological resources, and make comments and suggestions regarding historic resources. If your organization is interested in participating as a consulting party, please notify myself at daniel.koenig@dot.gov within 30 days of receipt of this letter.

Sincerely,



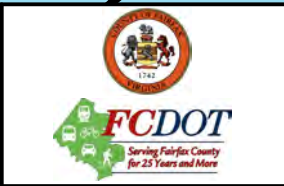
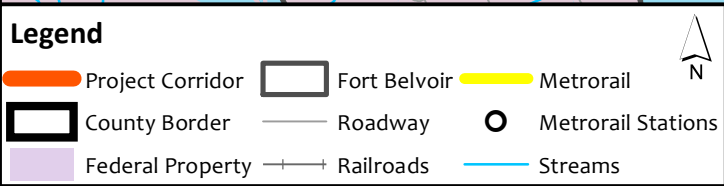
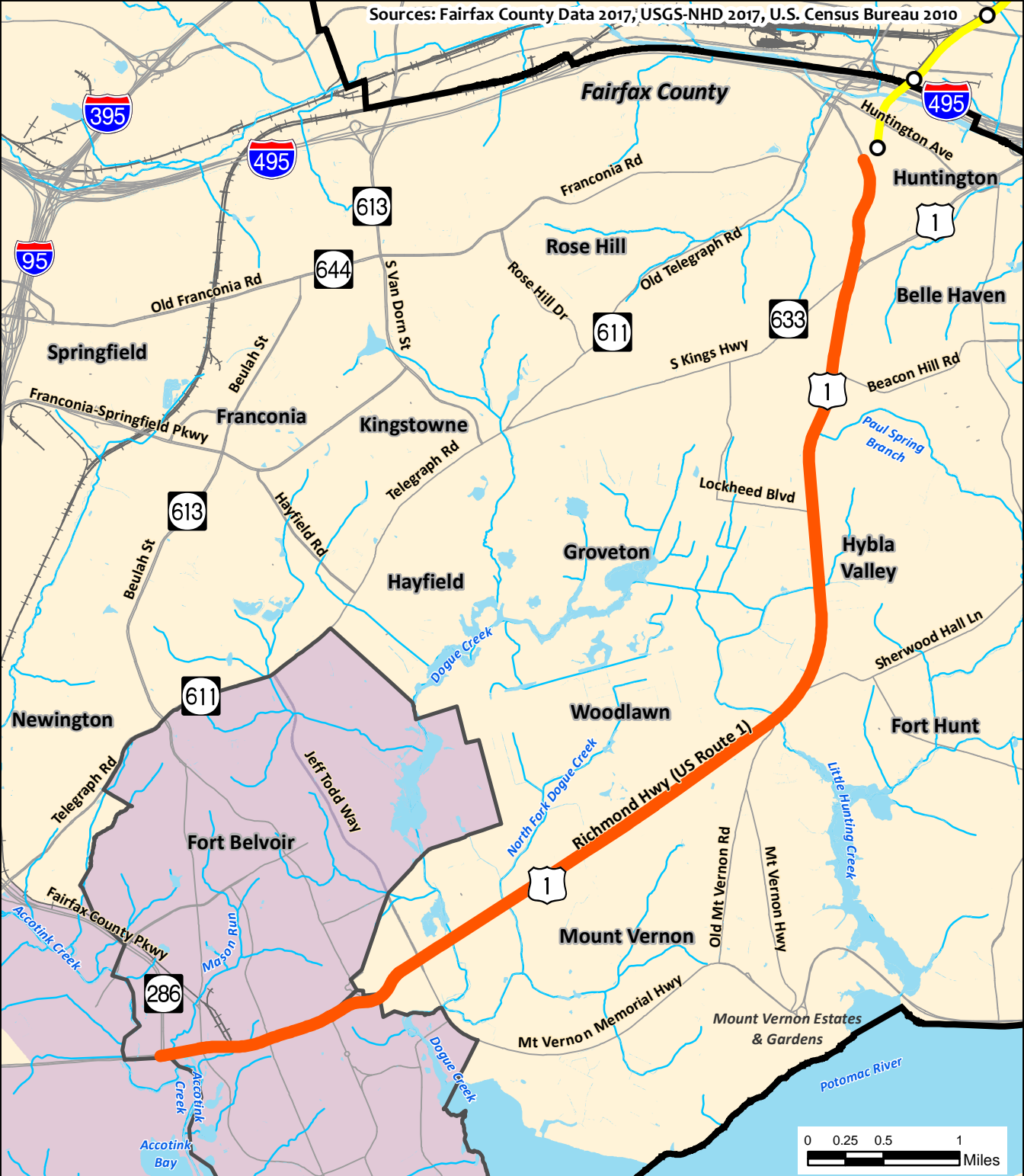
Daniel Koenig
Environmental Protection Specialist

cc: Lt. Col. Christopher Tomlinson, Department of the Army (Fort Belvoir)
Fred Selden, Fairfax County Government, Department of Planning and Zoning
Elizabeth Crowell Fairfax County Park Authority
Ronald Chase, Gum Springs Historical Society
Joel Gorder, National Park Service
Ross M. Bradford, National Trust for Historic Preservation (Woodlawn Plantation)
Brian Collison, Pillar Church of Woodlawn
Paul Kohlenberger, The Historical Society of Fairfax County
Anissa Brown, Virginia Department of Transportation
Ms. Deborah Dotson, Delaware Nation
Kim Penrod, Delaware Nation
Stephen Adkins, Chickahominy Indian Tribe
Gerald A. Stewart, Chickahominy Indians Eastern Division
W. Frank Adams, Upper Mattaponi Indian Tribe
Dean Branham, Monacan Indian Nation
Lee Lockamy, Nansemond Indian Nation
Robert Gray, Pamunkey Tribe
Anne Richardson, Rappahannock Tribe

Enclosures:

Attachment A: Location Map
Attachment B: APE Map
Attachment C: Previously Recorded Historic Architectural Resources Table
Attachment D: Previously Recorded Historic Architectural Resources Map
Attachment E: Newly Identified Historic Architectural Resources Table
Attachment F: Newly Identified Historic Architectural Resources Map
Attachment G: Invited Consulting Parties

Attachment A




Richmond Highway
Bus Rapid Transit Program

Location Map

Attachment B



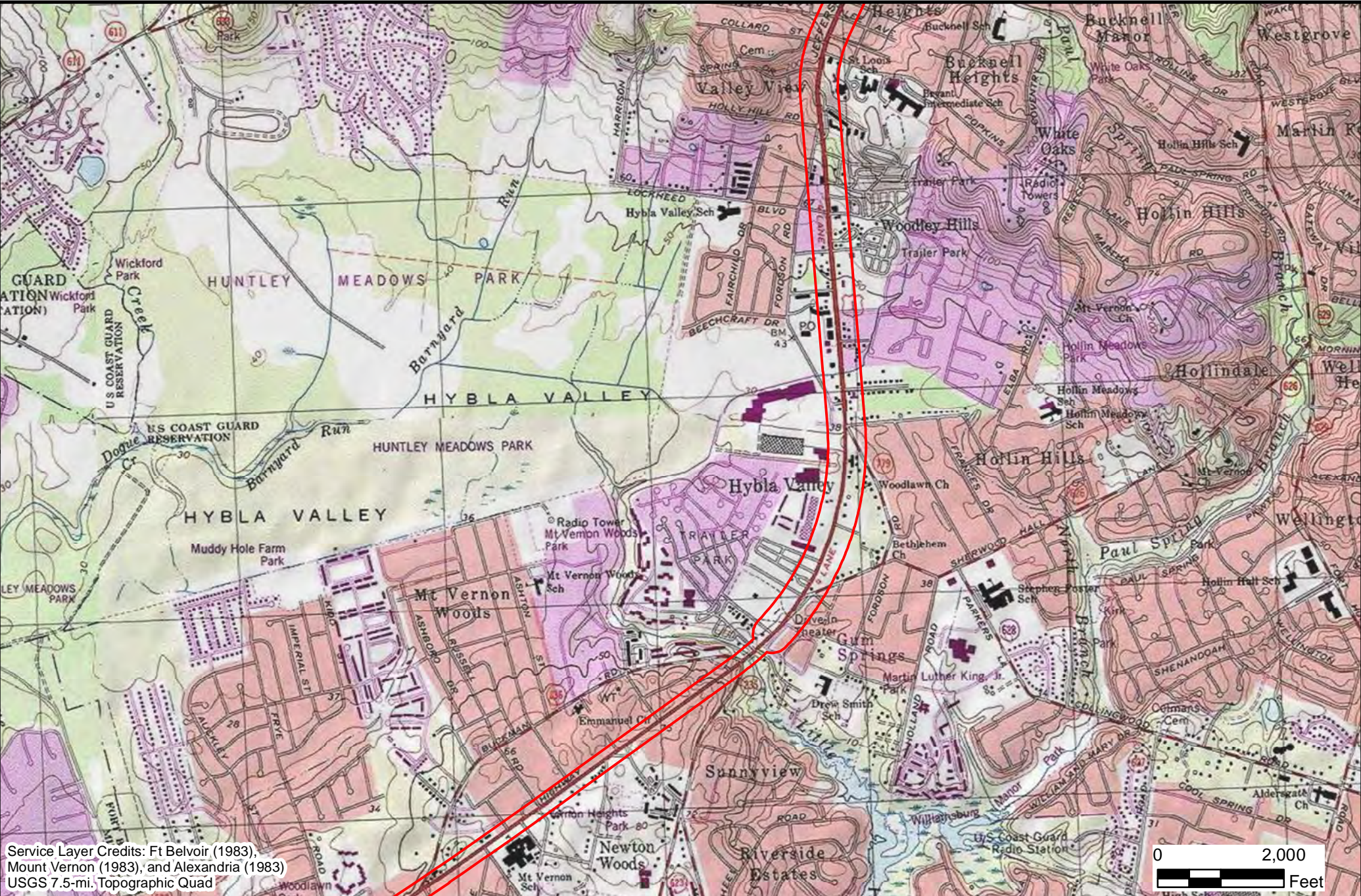
 Area of Potential Effects (APE)




Richmond Highway
Bus Rapid Transit Program

Area of Potential Effects (APE)

Date: 8/16/2018 Prepared By: MB



Service Layer Credits: Ft Belvoir (1983),
Mount Vernon (1983), and Alexandria (1983)
USGS 7.5-mi. Topographic Quad

 Area of Potential Effects (APE)

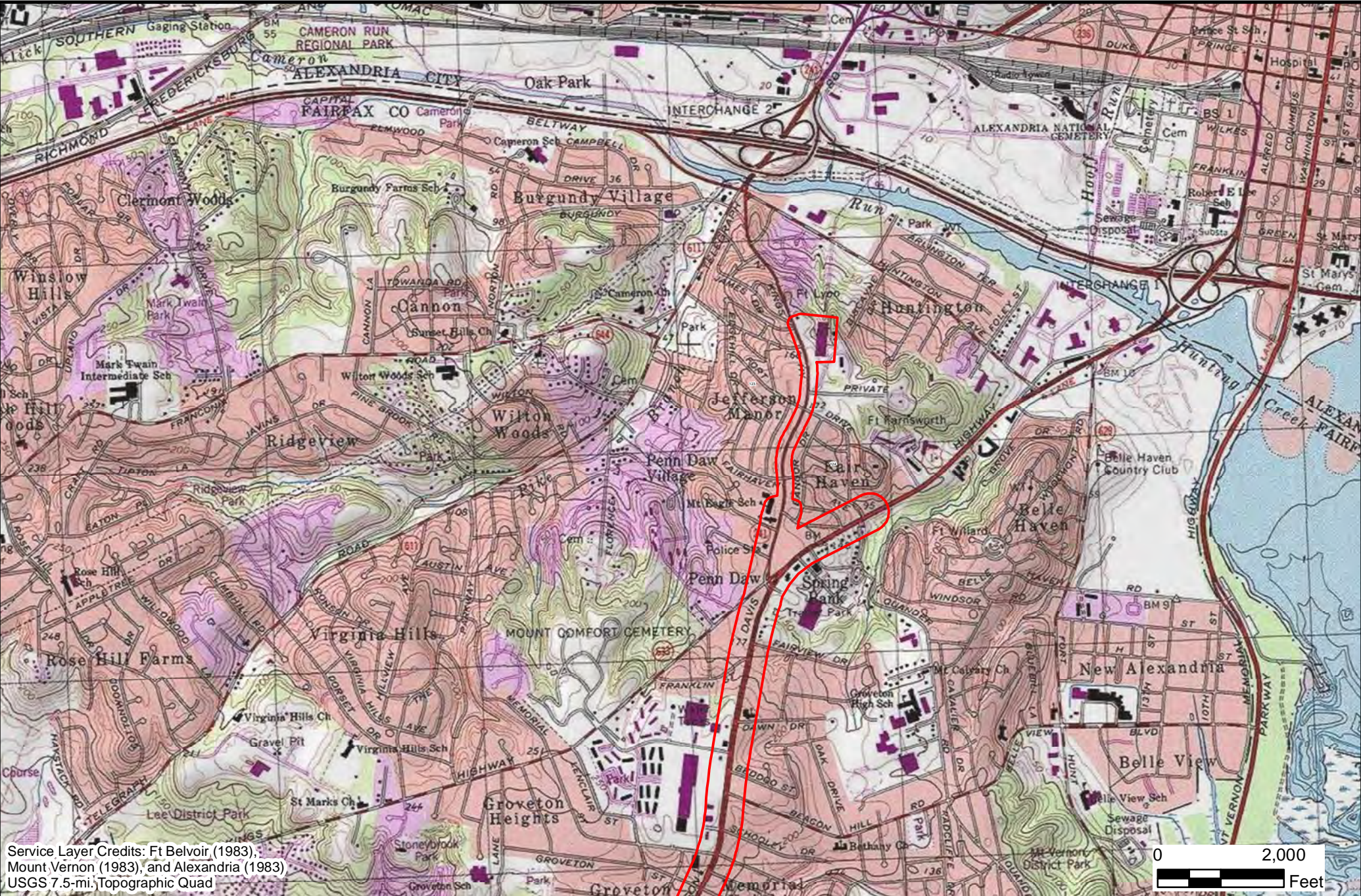


Map 2

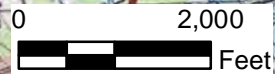


Richmond Highway
Bus Rapid Transit Program
Area of Potential Effects (APE)

Date: 8/16/2018 Prepared By: MB



Service Layer Credits: Ft Belvoir (1983), Mount Vernon (1983), and Alexandria (1983) USGS 7.5-mi. Topographic Quad



 Area of Potential Effects (APE)



Map 3



Richmond Highway
Bus Rapid Transit Program
Area of Potential Effects (APE)

Date: 8/16/2018 Prepared By: MB

Attachment C

Previously Recorded Historic Architectural Resources Table

*Highlighted resources are to be resurveyed

DHR ID No.	Name/Address	NRHP Status
029-0056	Woodlawn Plantation/9000 Richmond Highway	DHR Staff: Eligible (11/29/2016), DHR Staff: Historic District, Contributing (8/30/2012), NRHP Listing Addendum (11/18/2011), VLR Listing Addendum (9/22/2011), NRHP Nomination (3/1/2011), NHL (8/5/1998), NRHP Nomination (2/8/1971), NRHP Listing (2/26/1970), VLR Listing (12/2/1969), NRHP Nomination (11/19/1969); associated with the Woodlawn Cultural Landscape Historic District (029-5181)
029-0096	Camp A. A. Humphreys Pump Station and Filter Building/9155 Richmond Highway	VLR Listed (6/19/1996), NRHP Nomination (2/1/1996, not listed); associated with the Fort Belvoir Historic District (029-0209) (but located outside the VLR-listed district)
029-0156	Krispy Kreme Doughnut Company/6328 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-0230	Mount Vernon High School/8333 Richmond Highway	DHR Staff: Eligible (11/29/2016, 2/9/1987), DHR Board Det. Eligible (9/15/2016, 3/17/1987), DHR Evaluation Committee: Eligible (7/21/2016)
029-0479	Bridge, Route 1, #1001/Richmond Highway crossing Dogue Creek	DHR Staff: Not Eligible (11/29/2016)
029-5121	Malone House/8669 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5122	House/8668 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5123	International Auto Body/8656 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5124	AP Lawn Mower Repair/8622 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5126	Petitt House/8609 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5127	Wick's Repair, Inc./8600 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5128	Motel/8589-8591 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5129	Forest Laundromat/8541 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5130	Kimchi House Korean Restaurant/8537 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5131	Pretty Pets/8369 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)

DHR ID No.	Name/Address	NRHP Status
029-5132	Ploutis Painting & Contracting/8363 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5133	Kolas Painting/8361 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5134	Carts House/8359 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5135	Woodlawn Kennel/8340 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5136	Red Carpet Inn/8257 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5137	House/8238 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5138	Pinto Contractors/8234 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5139	Village Turf/8218 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5140	8214 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5142	C&M Auto Machine Shop/8135 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5143	House/8126 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5144	House/8124 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5146	Harmony Place Trailer Park/8018 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5147	House/7024 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5148	House/7020 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5149	Monsignor Walsh Hall/2901 Popkins Lane	DHR Staff: Not Eligible (10/16/2001)
029-5150	House/3101 Collard Street	DHR Staff: Not Eligible (10/16/2001)
029-5151	House/3100 Collard Street	DHR Staff: Not Eligible (10/16/2001)
029-5152	Walker House/6950 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5153	Hatmaker House/2923 E. Lee Avenue	DHR Staff: Not Eligible (10/16/2001)
029-5154	House/6835 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5155	House/6831 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5156	Mount Vernon-Lee Chamber of Commerce/6821 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)

DHR ID No.	Name/Address	NRHP Status
029-5157	Hair Improvements/2817 Schooley Drive	DHR Staff: Not Eligible (10/16/2001)
029-5158	Whiz Cleaners/6701 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5159	Fairview Motel/6421 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5160	Alexandria Motel/6411 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5161	Dawson's Cleaners/6410 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5162	House/6215 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5163	House/6213 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5164	House, 6211 Richmond Highway (Function/Location)/6211 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5165	Cedar Lodge Motel (Current)/6140 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5166	Hawaiian Pool & Spa (Current)/6130 Richmond Highway	DHR Staff: Not Eligible (10/16/2001)
029-5181	Woodlawn Cultural Landscape Historic District/Fort Belvoir, Mount Vernon	DHR Staff: Eligible (11/29/2016), NRHP Nomination (10/5/2015, not listed), Potentially Eligible (8/30/2012, 12/20/2001)
029-5181-0005	Woodlawn Stables/8907 Richmond Highway	DHR: No change in status on 5/4/2017, DHR Staff: Potentially individually eligible bank barn on 8/30/2012, DHR Staff: Contributing to Woodlawn Cultural Landscape Historic District (029-5181) on 8/30/2012
029-5181-0006	Otis Tufton Mason House/8907 Richmond Highway	DHR Staff: Not eligible on 8/30/2012, DHR Staff: Contributing to Woodlawn Cultural Landscape Historic District (029-5181) on 8/30/2012
029-5181-0007	Arcadia Farm Property/8900 Richmond Highway	DHR: Not eligible on 5/4/2017; associated with the Woodlawn Cultural Landscape Historic District (029-5181), but only mostly modern resources remaining
029-5422	Installation Sign, Facility No. 1402/ Richmond Highway and Pohick Road	DHR Staff: Not Eligible (7/25/2007), noted demolished by previous survey
029-5423	Golf Course, 9 Hole (South Post), South Post Golf Course, Facility No. 1432/Fort Belvoir	DHR Staff: Eligible (7/25/2007); associated with the Fort Belvoir Historic District (029-0209) (but located outside the VLR-listed district), noted demolished by previous survey
029-5424	Fort Belvoir Railroad Bridge (Bridge No. 1433)/Railroad spanning Richmond Highway	DHR Staff: Eligible (8/30/2012); associated with the Fort Belvoir Military Railroad Historic Corridor (029-5724)

DHR ID No.	Name/Address	NRHP Status
029-5425	Vehicle Bridge, Facility No. 1443/Gunston Road spanning Richmond Highway	DHR Staff: Not Eligible (8/30/2012)
029-5428	Installation Sign, Facility No. 1808/Richmond Highway and Belvoir Road	DHR Staff: Not Eligible (8/30/2012)
029-5648	Fort Belvoir Military Railroad Track Bed/Fort Belvoir	Associated with the Fort Belvoir Military Railroad Historic Corridor (029-5724)
029-5682	The Courts at Belvoir/9140 Richmond Highway, Fort Belvoir	DHR Staff: Not Eligible (8/30/2012)
029-5683	Commercial Building/9150-9160 Richmond Highway, Fort Belvoir	DHR Staff: Not Eligible (8/30/2012)
029-5684	House/9170 Richmond Highway, Fort Belvoir	DHR Staff: Not Eligible (8/30/2012)
029-5690	House/9135 Anderson Lane	DHR Staff: Not Eligible (8/30/2012)
029-5705	Commercial building/8853-59 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-5708	(Old) River Road (Historic), Accotink Turnpike (Historic), Historic Route 1 (Historic/Current), Jefferson Davis Memorial Highway (Historic), Richmond Highway (Current)/Richmond Highway, Route 1	DHR Staff: Not Eligible (11/29/2016)
029-5711	Culvert/under Richmond Highway, east of Fairfax County Parkway (SR 7100)	DHR Staff: Not Eligible (8/30/2012)
029-5712	Culvert/under Richmond Highway at Fort Belvoir Railroad Bridge	DHR Staff: Not Eligible (8/30/2012)
029-5724	Fort Belvoir Military Railroad Historic Corridor/Fort Belvoir	DHR Staff: Potentially Eligible (3/1/2017), VLR Listed (6/16/2016), NRHP Nomination (1/13/2015, not listed)
029-6045	Church, 7730 Fordson Road (Function/Location), Woodlawn Methodist Church (Historic)/7730 Fordson Road - Alt Route 779	Not Evaluated
029-6070	Touba African Hair Braiding & Beauty Supply/8139 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6073	Amon Retail Center/8121 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6074	El Amanecer/8113 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)

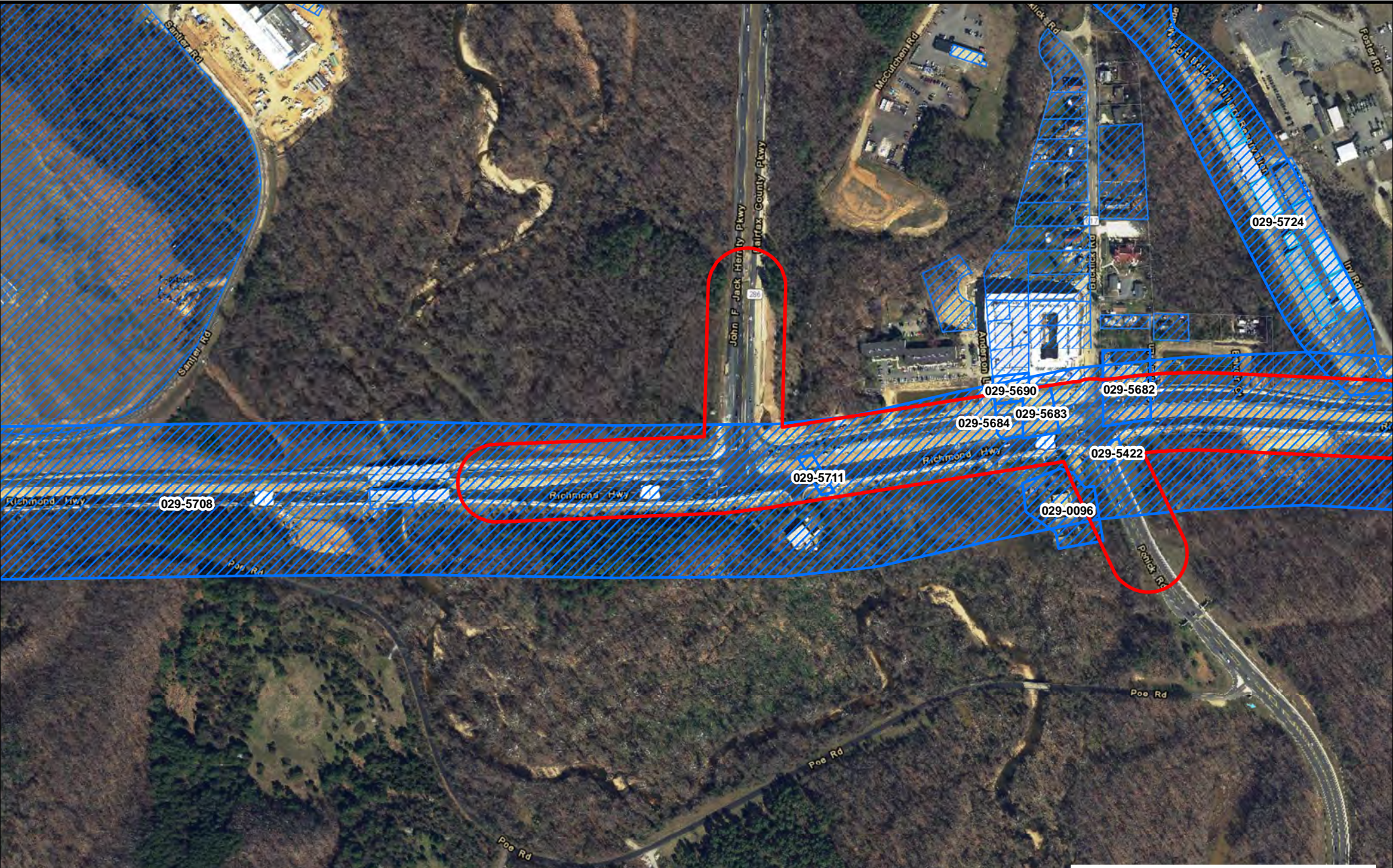
DHR ID No.	Name/Address	NRHP Status
029-6075	Mount Vernon Antique Center/8101 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6080	M&B Automotive Services/8130 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6085	House/3511 Rolling Hills Avenue	DHR Staff: Not Eligible (11/29/2016)
029-6086	House/3509 Rolling Hills Avenue	DHR Staff: Not Eligible (11/29/2016)
029-6087	House/3507 Rolling Hills Avenue	DHR Staff: Not Eligible (11/29/2016)
029-6088	House/3505 Rolling Hills Avenue	DHR Staff: Not Eligible (11/29/2016)
029-6091	Hybla Valley Center/8120 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6092	House/8122 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6095	Goodwill/8228 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6098	Mount Vernon Shopping Center/ 8244-8256 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6100	Mount Vernon Auto Repair/8249 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6101	BP/8263 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6103	Sunoco/8300 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6105	Twystid Imagez Tattoo Studio/8312 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6108	Marcel Center/8328-8332 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6109	Mt. Vernon Auto Clinic/8334 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6110	5 Ten Foodmart/8339 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6112	Action Pre-Owned Cars/8150 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6113	Mt. Vernon Car Wash/8149 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6114	Potomac Motors Body & Paint/8153 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6115	Mobil/8156-8158 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)

DHR ID No.	Name/Address	NRHP Status
029-6116	Kwik Stop Center/8166-8178 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6117	8338 Washington Avenue	DHR Staff: Not Eligible (11/29/2016)
029-6120	Fast Auto Loans/8368 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6121	Pinewood South Condominiums/8426 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6122	Rent-All Center/8412 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6123	Cuco Lindo Restaurant/8428 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6124	Spirit of Faith Ministries/8431 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6125	Woodlawn Garden Apartments/8420 Blankenship Street	DHR Staff: Not Eligible (11/29/2016)
029-6126	Holly, Wood, and Vines/8453 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6127	Bestway Supermarket/8457 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6128	Thai Herbs Restaurant/8501 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6129	Engleside Mobile Home Park/8500 Greenleaf Street	DHR Staff: Not Eligible (11/29/2016)
029-6130	Rorer's Produce Market/8515 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6131	Ray's Mobile Colony/106 Denfield Drive	DHR Staff: Not Eligible (11/29/2016)
029-6132	Campbell & Ferrera Nursery/8351 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6133	8334 Washington Avenue	DHR Staff: Not Eligible (11/29/2016)
029-6136	Shell/8500 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6137	Skyview Park Plaza/8510- 8526 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6138	Skyview Apartments/8400- 8508 Sky View Drive	DHR Staff: Not Eligible (11/29/2016)
029-6139	Washington Square Apartments/8545-8583 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6140	Griffin Plumbing/8601 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)

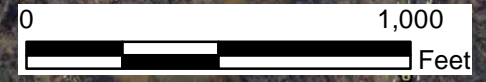
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029-6141	Absolute Tree & Stump Removal/ 8605 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6148	House/8618 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6149	Engleside Plaza/8624-8652 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6150	7-Eleven/8629-8631 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6152	First AME Church/8653 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6153	Best Cleaners & Auto Body/8655 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6154	Ourisman Suzuki/8670 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6155	Woodlawn Shopping Center/8700-8716 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6156	Wells Fargo/8770 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6157	Gulf Station/8689 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6158	Su Pollo Peruvian Restaurant/8741 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6159	Belvoir Plaza Apartments/8743 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6160	EP Stump & Tree Removal/8801 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6161	Sitco, Inc./8800 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6162	Shell/8851 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6163	Roy Rogers/8860 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6165	Mount Vernon Knights of Columbus Hall/8592 Richmond Highway	DHR Staff: Not Eligible (11/29/2016)
029-6197	Spring Garden Apartments/7959 Richmond Highway	DHR: Not Eligible on 5/4/2017
029-6198	Greater Morning Star Apostolic Church/7929 Richmond Highway	DHR: Not Eligible on 5/4/2017




DHR ID No.	Name/Address	NRHP Status
029-6199	Commercial building/7925 Richmond Highway	DHR: Not Eligible on 5/4/2017
029-6200	United Bank/7901 Richmond Highway	DHR: Not Eligible on 5/4/2017
029-6247	Commercial Building, 6239 Shields Avenue (Function/Location), Evolution Home (Current Name)/6239 Shields Avenue	Not Evaluated

Attachment D



Service Layer Credits: ESRI, Garmin, OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service



-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties

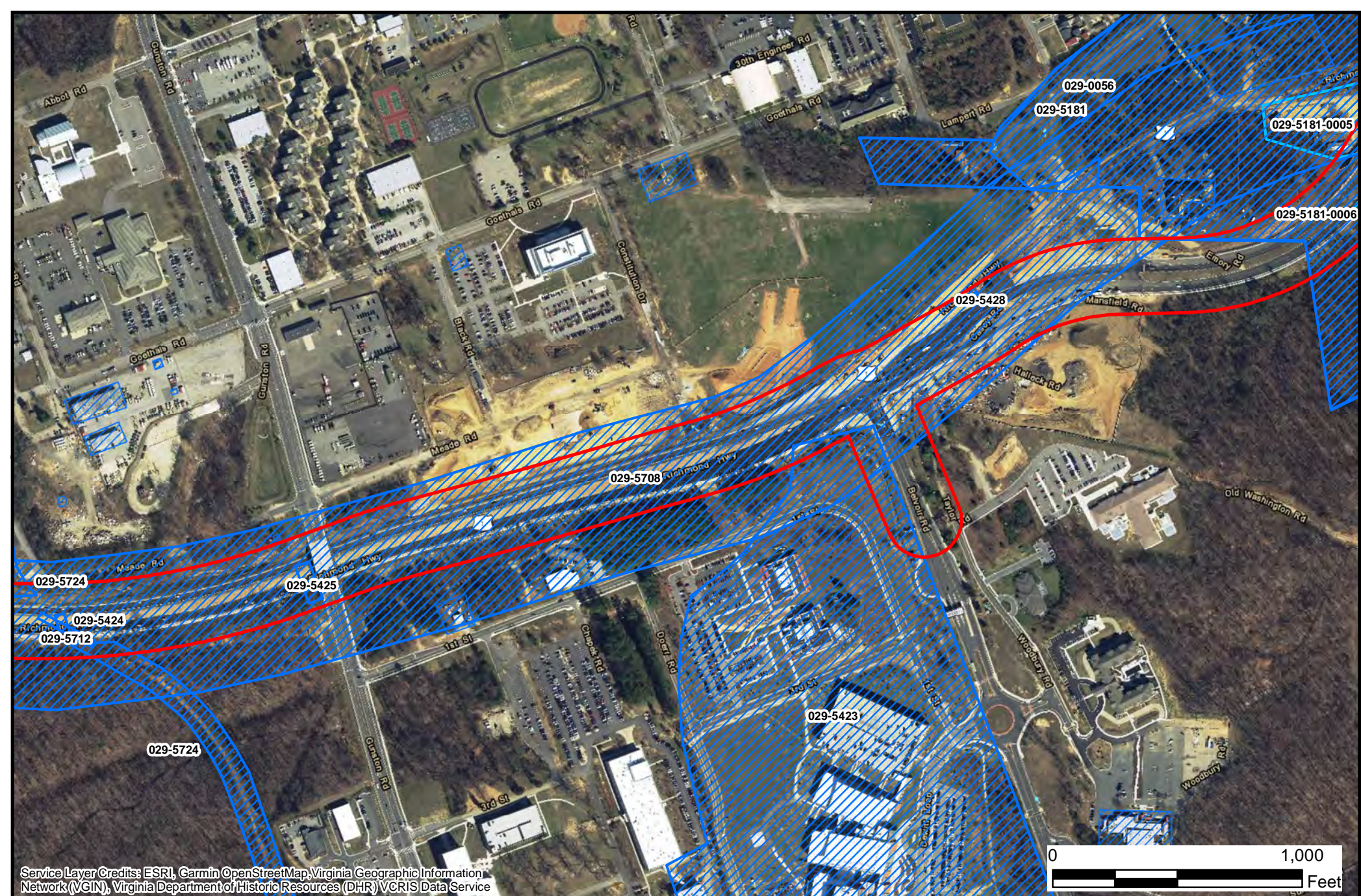


Map 1



Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



- Area of Potential Effects (APE)
- Architecture Resources
- Individual Historic District Properties

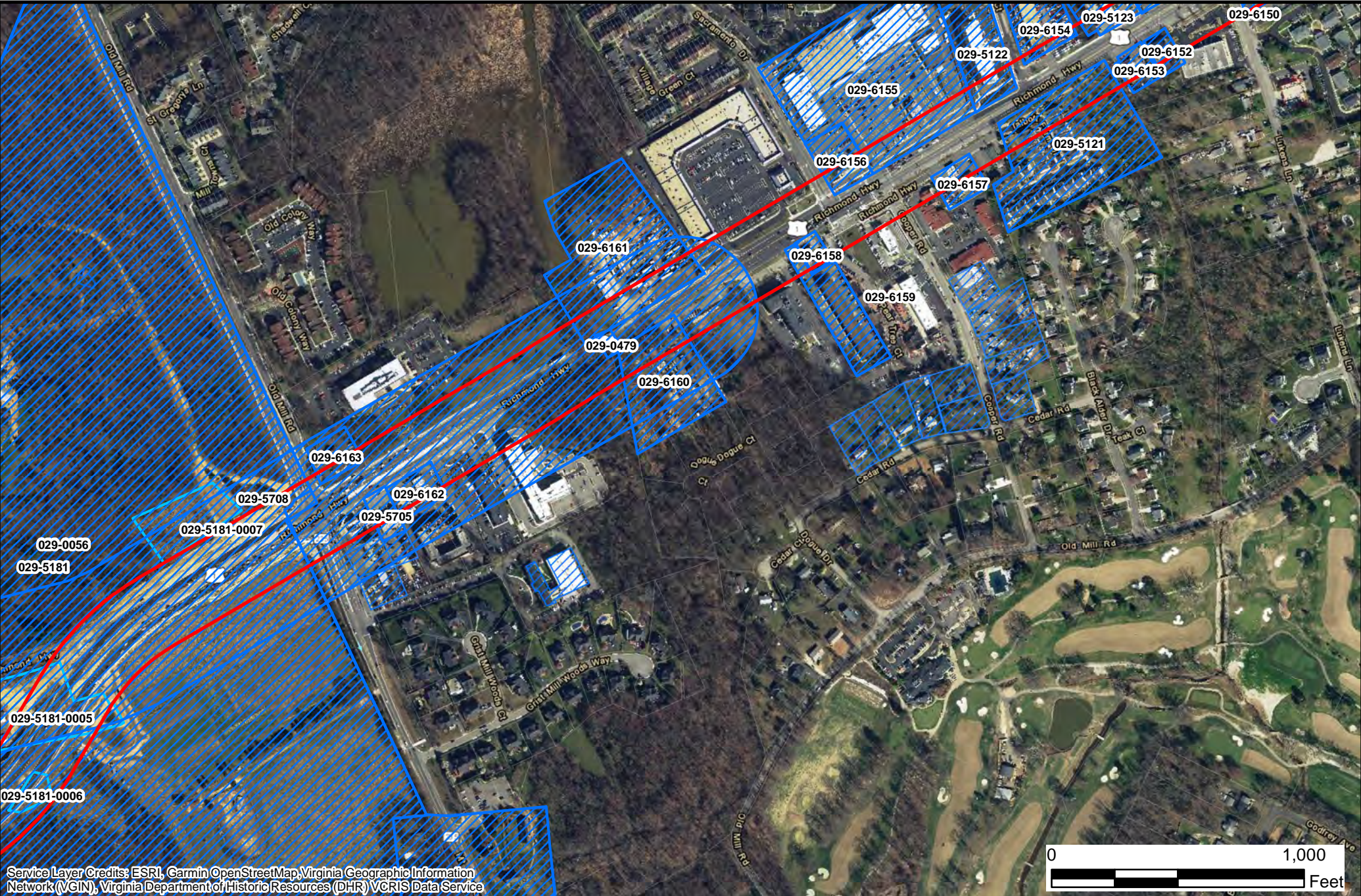


Map 2






Richmond Highway
 Bus Rapid Transit Program
**Previously Recorded
 Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties



Map 3



Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**




Date: 8/20/2018 Prepared By: MB



Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties

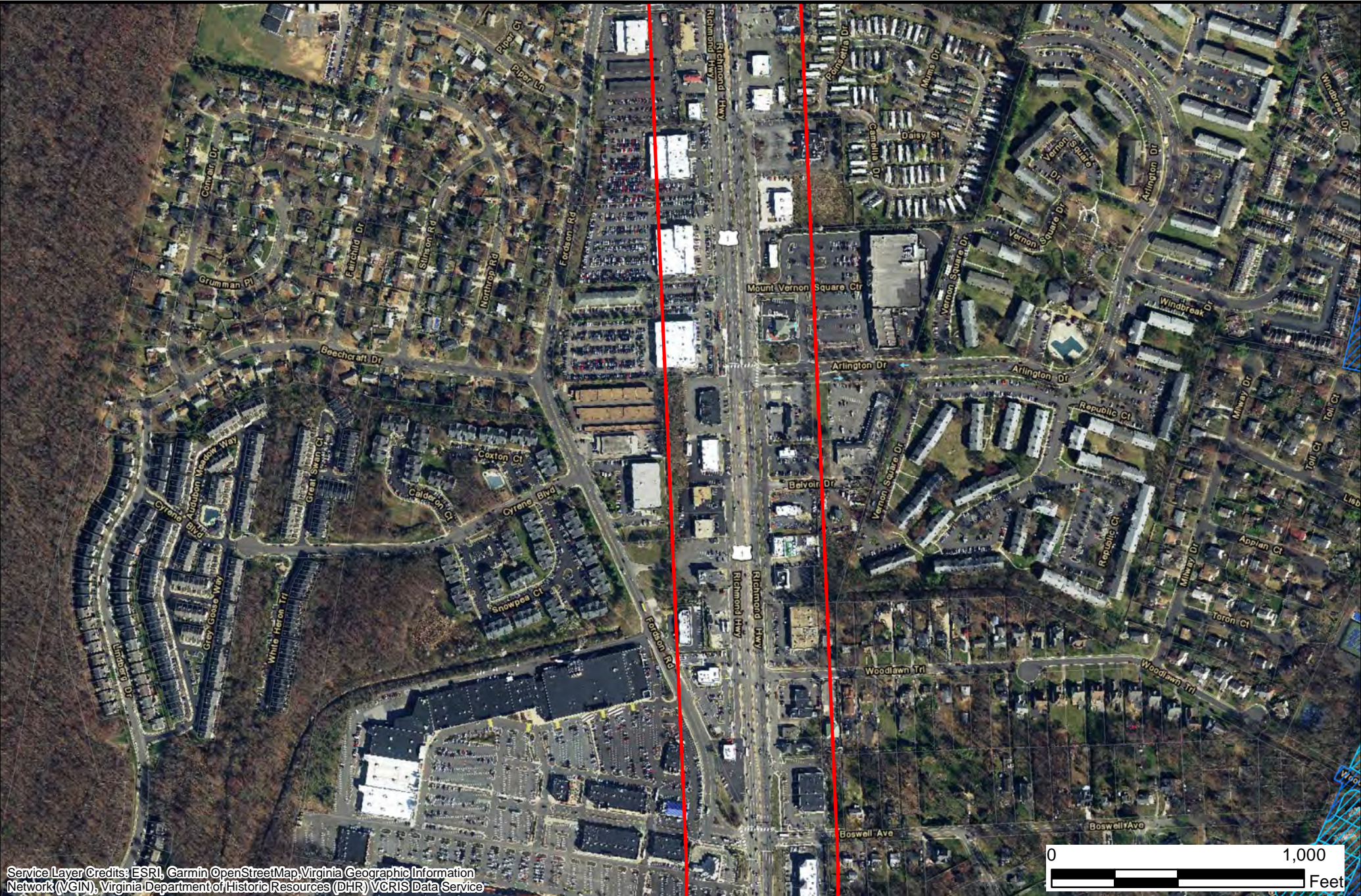


Map 6






**Richmond Highway
Bus Rapid Transit Program
Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties

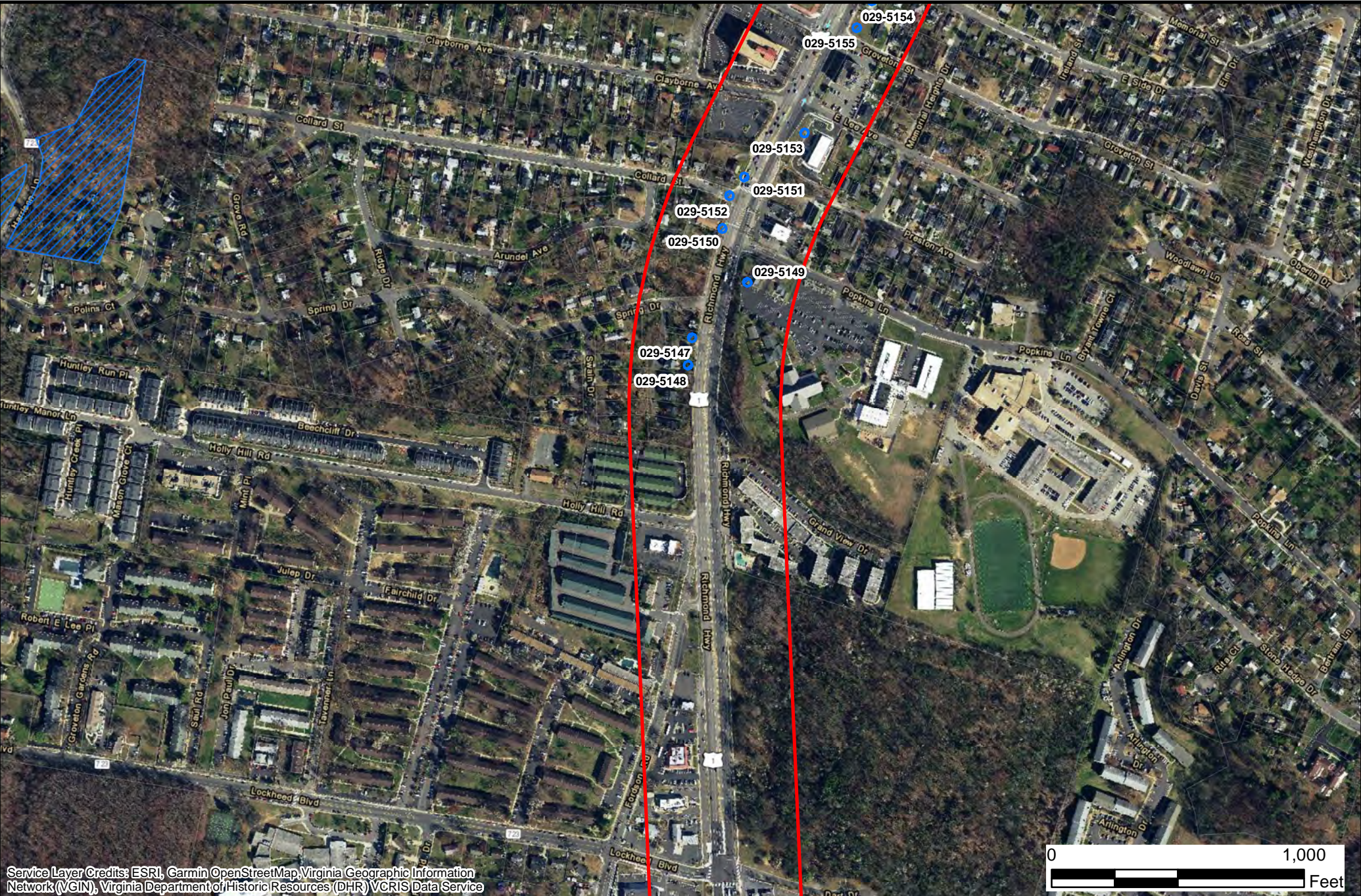


Map 7






Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties



Map 8






Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties

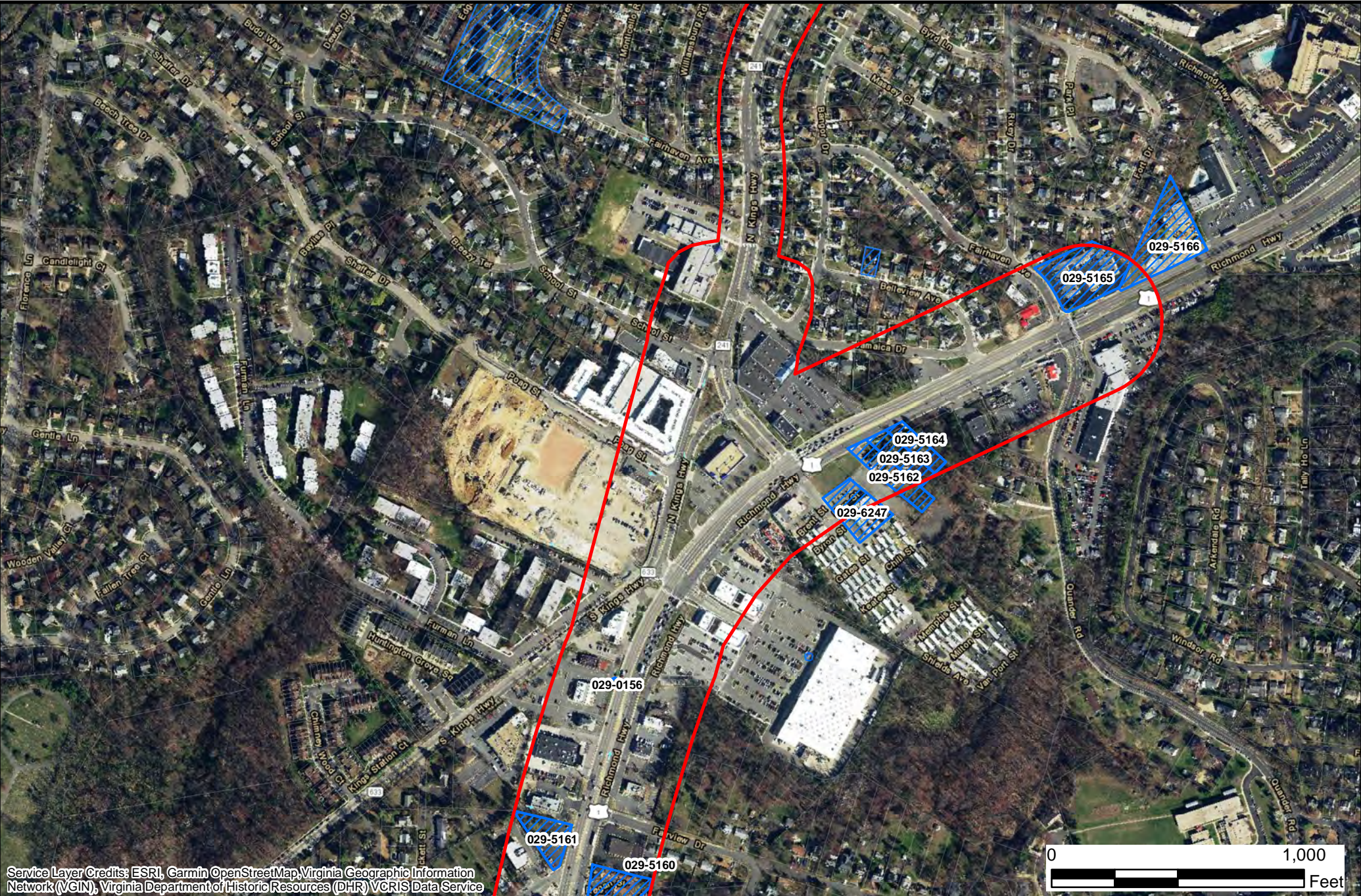


Map 9






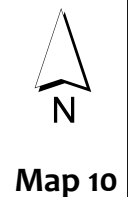
Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR) VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties






Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Architecture Resources
-  Individual Historic District Properties



Map 11



Richmond Highway
Bus Rapid Transit Program
**Previously Recorded
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB

Attachment E

Newly Identified Historic Architectural Resources Table

Map No.	Name	Address	Build Year	Description
1	Canterbury Square	9190 Richmond Highway	1964	Garden apartments
2	Richmond Highway (Historic Route 1)	Alexandria	ca. 1664	Road segment
3		8685 Richmond Highway	1973	
4		8623 Richmond Highway	1973	
5	Virginia Electric and Power Company	8595 Richmond Highway	ca. 1959	Electrical substation
6		8145 Richmond Highway	1935	
7		8143 Richmond Highway	1973	Commercial
8		8131 Richmond Highway	1940	
9		8010 Richmond Highway	1973	
10	Mr. Kleen Car Wash & Detailing Center	8000 Richmond Highway	1972	Car wash
11		7846 Richmond Highway	1973	
12	Mount Vernon Crossroads	7840 Richmond Highway	1968	Shopping center (remodeled extensively)
13		7770 Richmond Highway	1974	Commercial
14	Cleaners	7714 Richmond Highway	1960	
15	Mount Vernon Plaza	7694 Richmond Highway	1970	
16		7712 Fordson Road	1952	
17		2905 Boswell Avenue	1940	
18	Hybla Valley Veterinary Hospital	7627 Richmond Highway	1948	Veterinary hospital
19	Parks Dry Cleaners	7623 Richmond Highway	1960	Dry cleaners
20		7619 Richmond Highway	1974	Retail

Map No.	Name	Address	Build Year	Description
21		2912 Woodlawn Trail	1947	
22	Peking Duck Restaurant	7531 Richmond Highway	1968	Restaurant
23	Cyprus Air Heating & Cooling	7525 Richmond Highway, Alexandria	1969	Heating and cooling
24	Hybla Valley Gulf Service Center/Liberty	7501 Richmond Highway	1971	Fuel station
25	Hess/Speedway	7600 Richmond Highway	1970	Service station
26	First Union National Bank/Latino Plaza	7524 Richmond Highway	1963	Bank (currently retail)
27		7520 Richmond Highway	1973	Retail
28		7516 Richmond Highway	1973	Retail
29	Kinney Shoes	7508 Richmond Highway	1956	Retail
30	Robert Hall	7500 Richmond Highway	1956	Retail
31		7419 Richmond Highway	1974	
32		7405 Richmond Highway	1973	Restaurant
33	Medical Supply/Kang's Market/Chiropractic	7329 Richmond Highway	1940	Retail
34	MVC Late Night DVD	7321 Richmond Highway	1940	Retail
35	Shakey's Pizza Parlor	7305 Richmond Highway	1969	Restaurant
36	Shell	7303 Richmond Highway	1969	Fuel station
37	7-Eleven	7330 Richmond Highway	1960	Convenience store
38	Red Barn/El Pollo Primero	7324 Richmond Highway	1968	Restaurant
39	Verizon	7309 Fordson Road	1967	Office
40	Sunoco	7302 Richmond Highway	1970	Fuel station

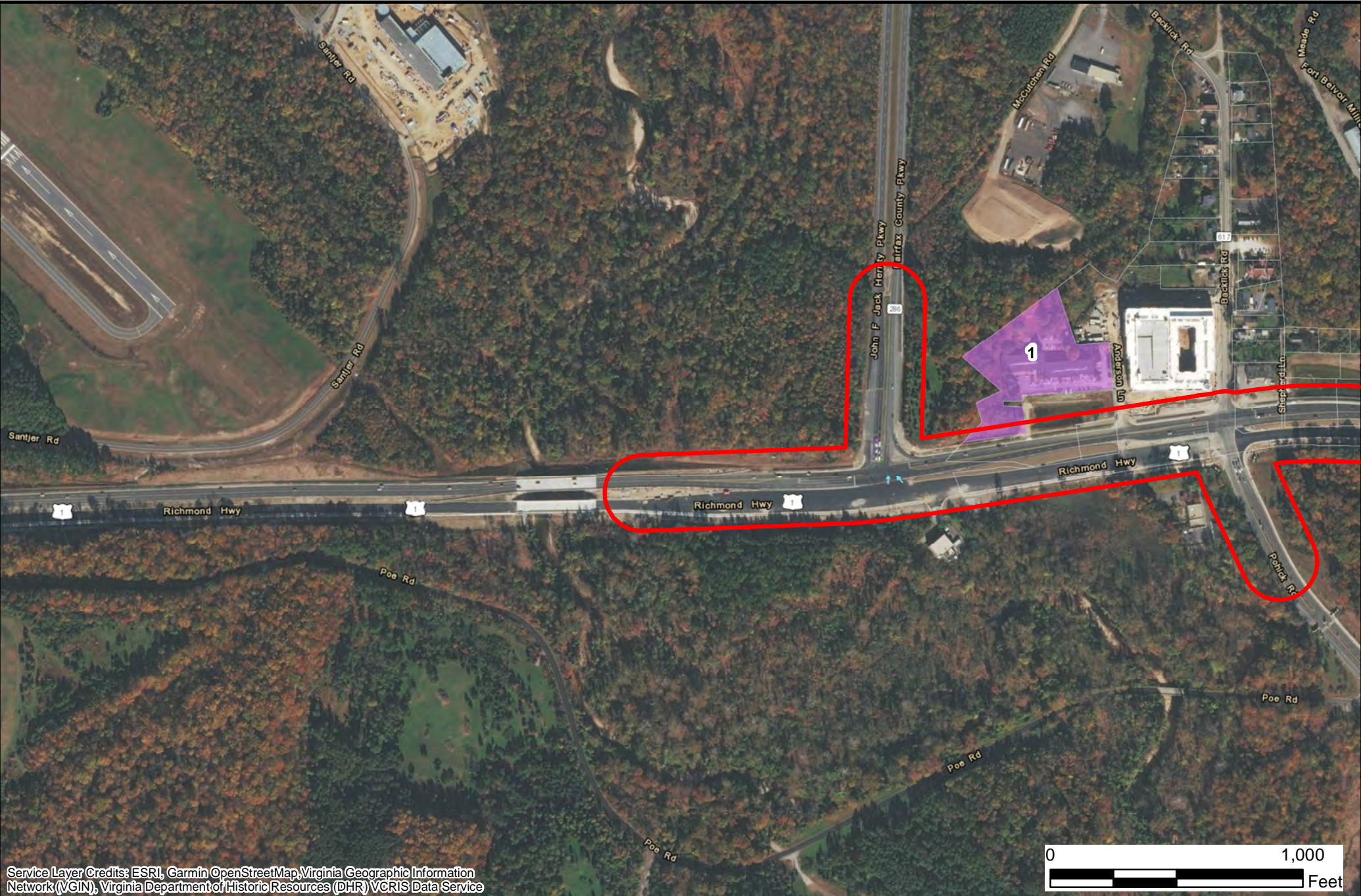
Map No.	Name	Address	Build Year	Description
41		3100 Lockheed Boulevard	1970	
42	Meadow Woods Apartments	3808 Lockheed Boulevard	1964	Garden apartments
43	Quality Inn	7212 Fordson Road	1962	Hotel (and street sign across the street)
44	Green Drop	7210 Richmond Highway	1965	Retail
45	Jolly Ox Restaurant/Steak and Ale Restaurant/Order of Elks, Lodge No. 758	7120 Richmond Highway	1970	Restaurant (currently a fraternal organization)
46	Cherry Arms	7131 Richmond Highway	1965	Apartments
47		7033 Swain Drive	1953	Single dwelling
48		7023 Swain Drive	1958	Single dwelling
49		3115 Arundel Avenue	1937	Single dwelling
50		7004 Richmond Highway	1958	Single dwelling
51		3105 Collard Street	1952	Single dwelling
52		3107 Collard Street	1952	Single dwelling
53		3106 Collard Street	1941	Single dwelling
54		3104 Collard Street	1940	Single dwelling
55		3101 Clayborne Avenue	1957	Single dwelling
56		3014 Popkins Lane	1952	Single dwelling
57		6969 Richmond Highway	1974	Office
58	Key's Upholstery	6951 Richmond Highway	1965	Retail
59		3007 Preston Avenue	1944	Single dwelling
60		2917 E Lee Avenue	1925	Single dwelling
61		2916 E Lee Avenue	1942	Single dwelling
62		6911 Richmond Highway	1973	Office
63		2917 Groveton Street	1941	Single dwelling
64		2912 Groveton Street	1935	Single dwelling




Map No.	Name	Address	Build Year	Description
65		2916 E Lee Avenue	1942	Single dwelling
66		2922 Groveton Street	1940	Single dwelling
67		2921 E Side Drive	1930	Single dwelling
68		2915 E Side Drive	1935	Single dwelling
69		2918 E Side Drive	1968	Townhouse (multiple units)
70	Groveton Shell	6825 Richmond Highway	1965	Fuel station (vacant)
71		2833 Memorial Street	1936	Single dwelling
72		2827 Memorial Street	1937	Single dwelling
73		2832 Memorial Street	1952	Single dwelling
74		2836 Memorial Street	1952	Single dwelling
75	Mobil	6817 Richmond Highway	1955	Fuel station
76	Al's Tires & Rims	6809 Richmond Highway	1942	Retail
77	Cashpoint Car Title Loans/Boss Bail Bonds/360 Lifetime	6801 Richmond Highway	1942	Office/retail
78		2813 Schooley Drive	1940	Single dwelling
79		2809 Schooley Drive	1940	Single dwelling
80	Sparkle Car Wash	6737 Richmond Highway	1970	Car wash
81	Hybla Valley Nursery	2801 Beacon Hill Road	1947	Converted residential
82	Safeway/Petco	6612 Richmond Highway	1969	Supermarket (currently retail)
83	Holly Farms Restaurant/VCA Beacon Hill Cat Hospital	6610 Richmond Highway	1971	Restaurant (currently veterinary hospital)
84	Groveton Baptist Church	6511 Richmond Highway	1959	Church
85	Huntington Walk Condominiums	6429-6441 Richmond Highway	1966	Apartments (currently condominiums)

Map No.	Name	Address	Build Year	Description
86	Arthur Treacher's/Rosita's Restaurant & Carry Out	6510 Richmond Highway	1960	Restaurant
87	Fairview Center	6426-6442 Richmond Highway	1954	Retail
88	A&A Rental	6416 Richmond Highway	1958	Service garage
89		2905 Franklin Street	1951	Single dwelling
90		2829 Franklin Street	1949	Single dwelling
91		2821 Franklin Street	1954	Single dwelling
92		2820 Franklin Street	1933	Single dwelling
93		2816 Franklin Street	1935	Single dwelling
94		6415 Richmond Highway	1943	Commercial
95		2701 Fairview Drive	1960	Single dwelling
96	Gateway International Christian Church	6401 Richmond Highway	1964	Retail? (currently a church)
97	Lum's Restaurant/Before & After School Martial Arts	6319 Richmond Highway	1968	Restaurant (currently a martial arts studio)
98		6301 Richmond Highway	1973	Retail
99	Krispy Kreme	6328 Richmond Highway	1961	Retail (remodeled extensively)
100	Washington-Lee Savings and Loan Association/El Pollo Ranchero	6324 Richmond Highway	1962	Bank (currently a restaurant)
101	Wells Fargo	6300 Richmond Highway	1929	Bank
102	King Gardens Apartments	6300 S Kings Highway	1965	Apartments
103	Mt. Vernon Paint Co/Tobacco Colony/Cricket/San Miguel G. Store Tienda Latina	6229-6235 Richmond Highway	1952	Retail
104	Penn-Daw Terrace Trailer Park	6240 Shields Avenue	1957	Trailer Park

Map No.	Name	Address	Build Year	Description
105	Evolution Home	6239 Shields Avenue	1959	Retail and street sign adjacent to street
106		6216 Quander Road	1947	Single dwelling
107		6151 Richmond Highway	1975	Retail
108		6220 Quander Road	1935	Single dwelling
109		6200 Richmond Highway	1960	Retail
110	Goodwill/Advanced Auto Parts/Central Supermarket	6220-6224 Richmond Highway	1959	Retail
111	Discount Cleaners/Yemex Grocery/Veronica's Hair & Beauty Salon Peluqueria Hispana/Great Southern Tattoo Company/Chin's Kitchen Carry-out/7-Eleven	6128-6138 N Kings Highway	1955	Retail
112	Calvary Presbyterian Church	6120 N Kings Highway	1953	Church
113		2712 School Street	1950	Single dwelling
114	Mount Eagle Elementary School	6116 N Kings Highway	1949	School
115		5834 N Kings Highway		
116	Fair Haven Historic District	East of N King Highway	ca. 1945	Residential district composed of various post-WWII single family homes
117	Jefferson Manor Historic District	West of N King Highway	ca. 1950	Residential district composed of numerous post-WWII duplexes

Attachment F



-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District






Map 1



Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District

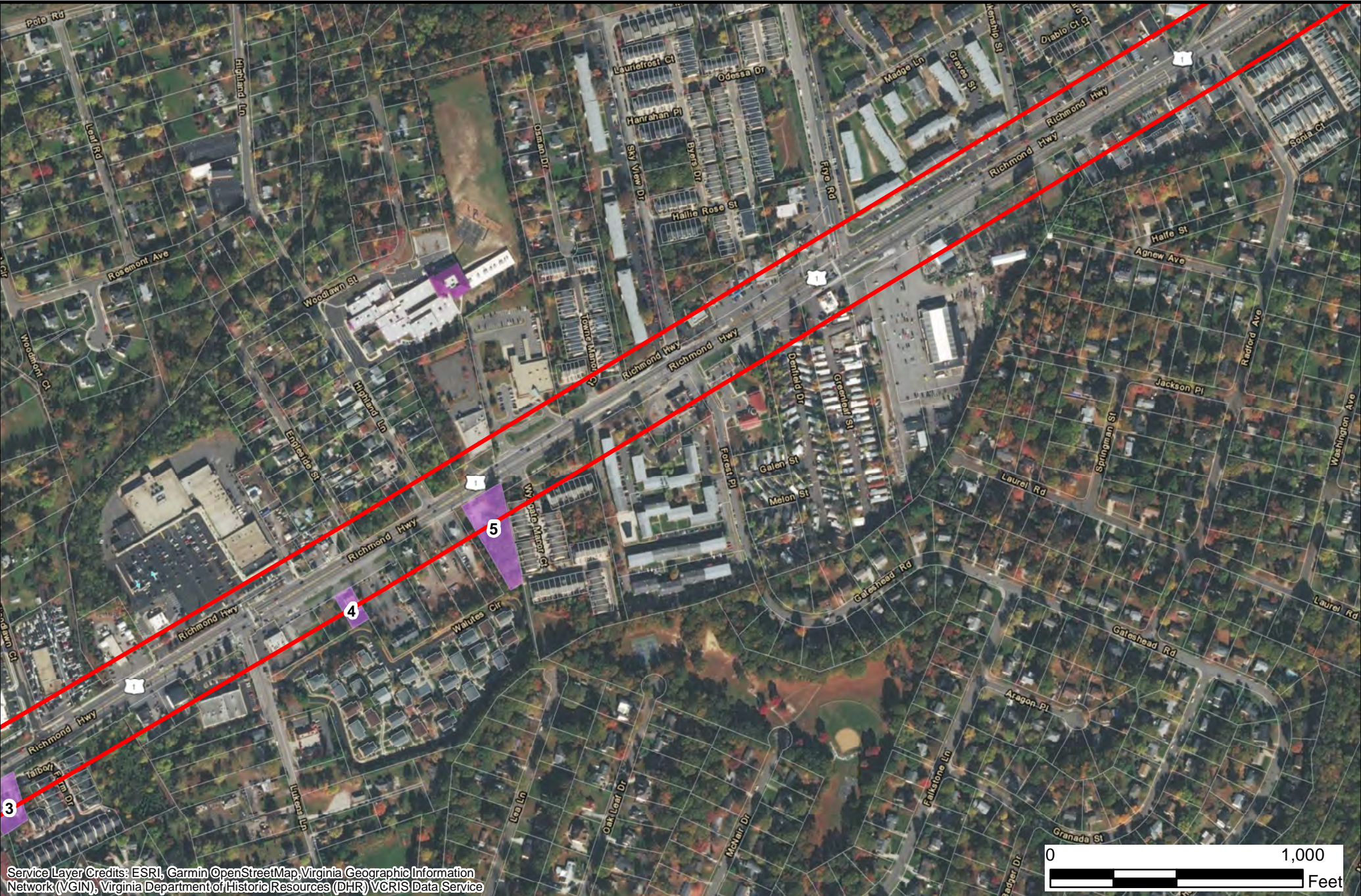


Map 3






Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin/OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District

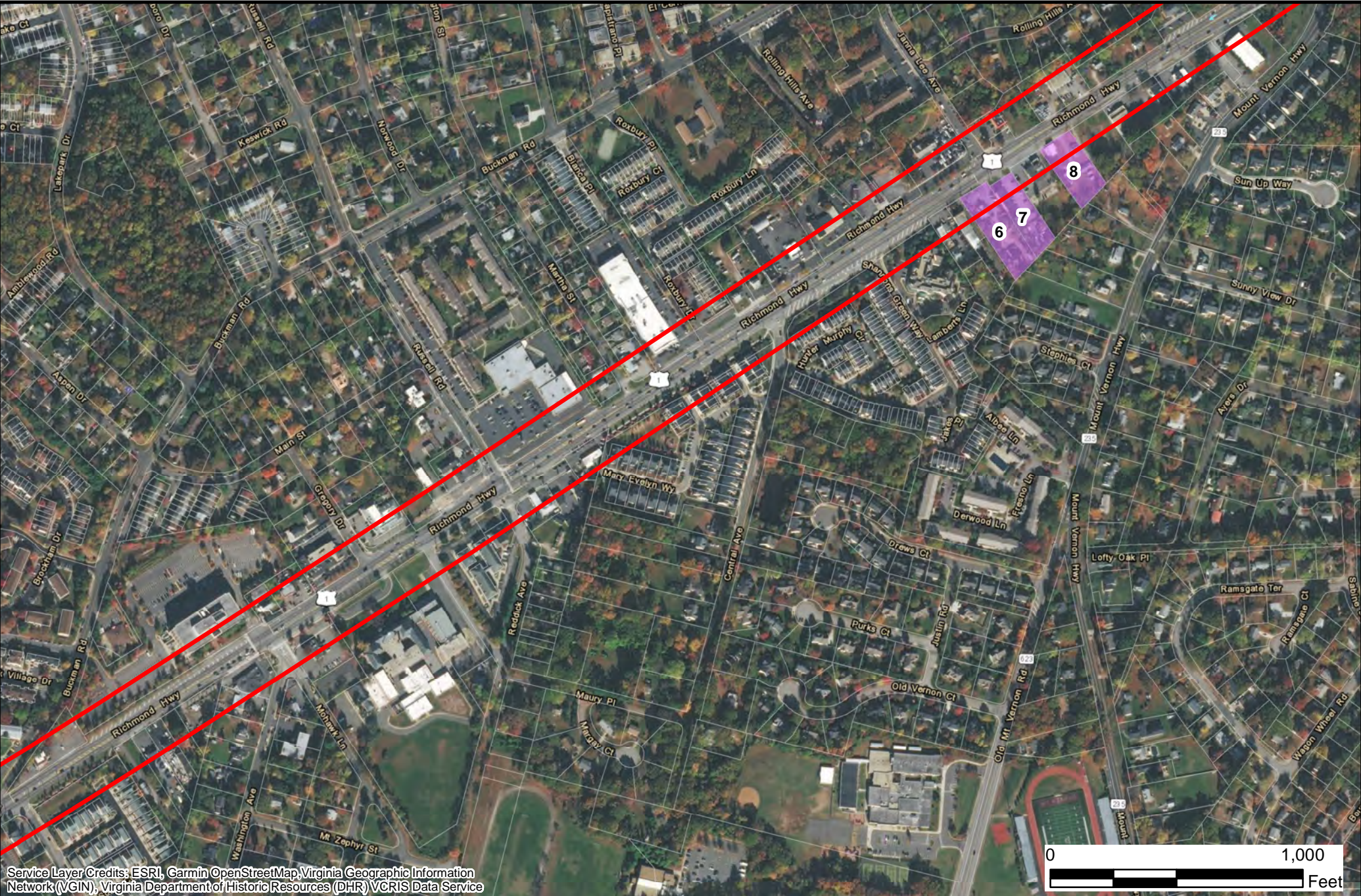


Map 4






**Richmond Highway
Bus Rapid Transit Program
Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District

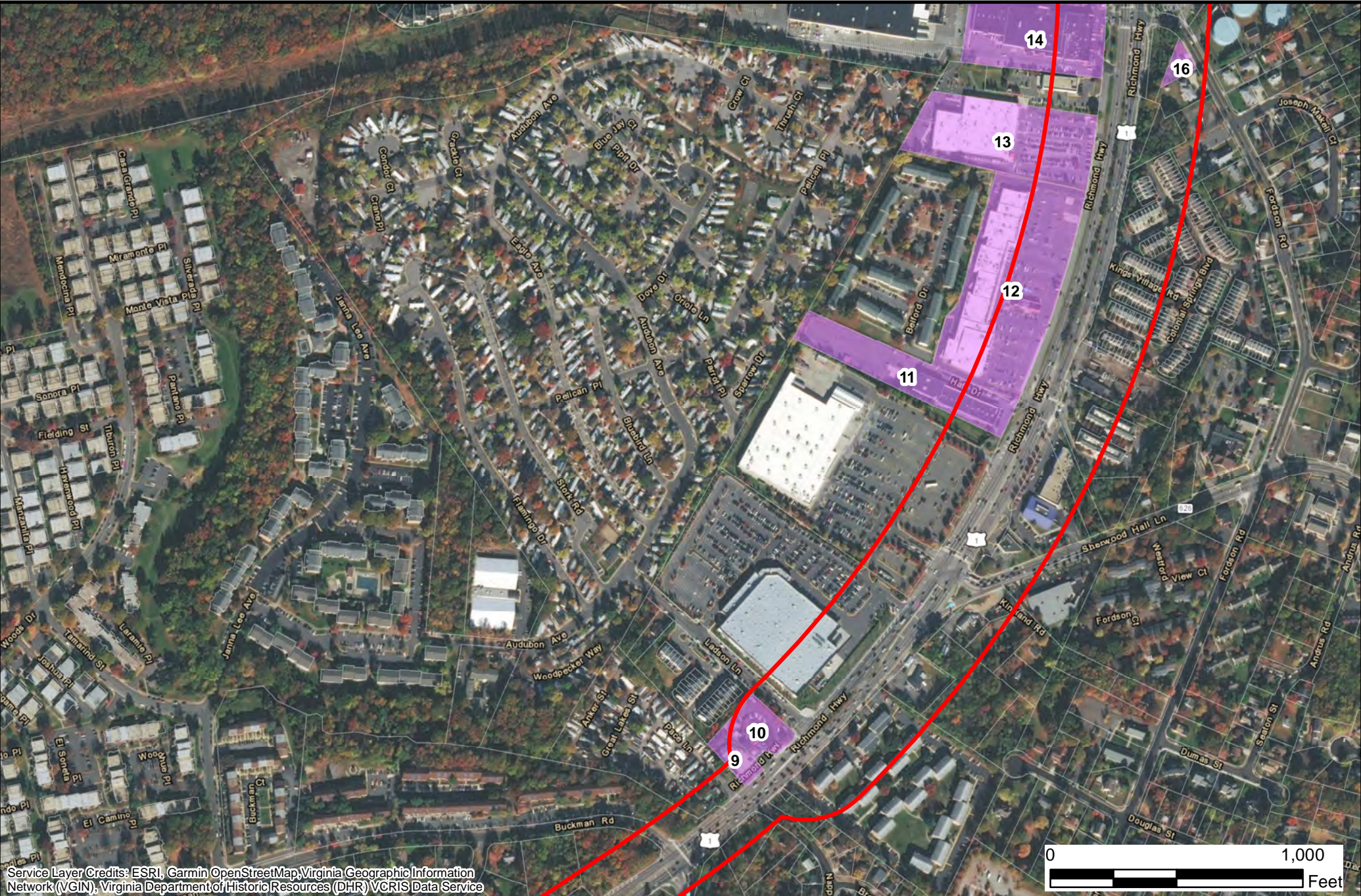


Map 5






Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District

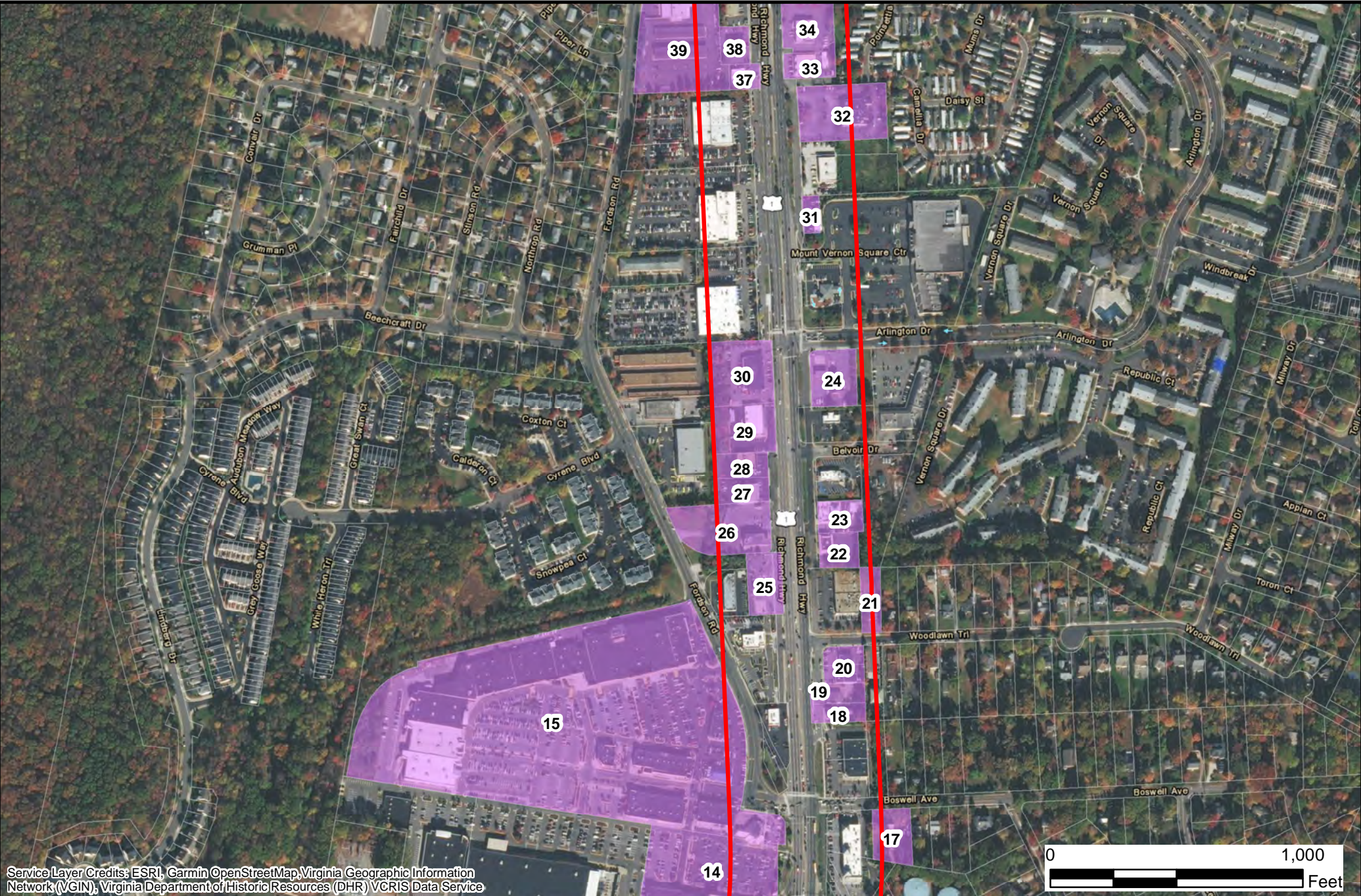


Map 6



Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

- Area of Potential Effects (APE)
- Newly Identified Historic Architectural Resource
- Potential Historic District

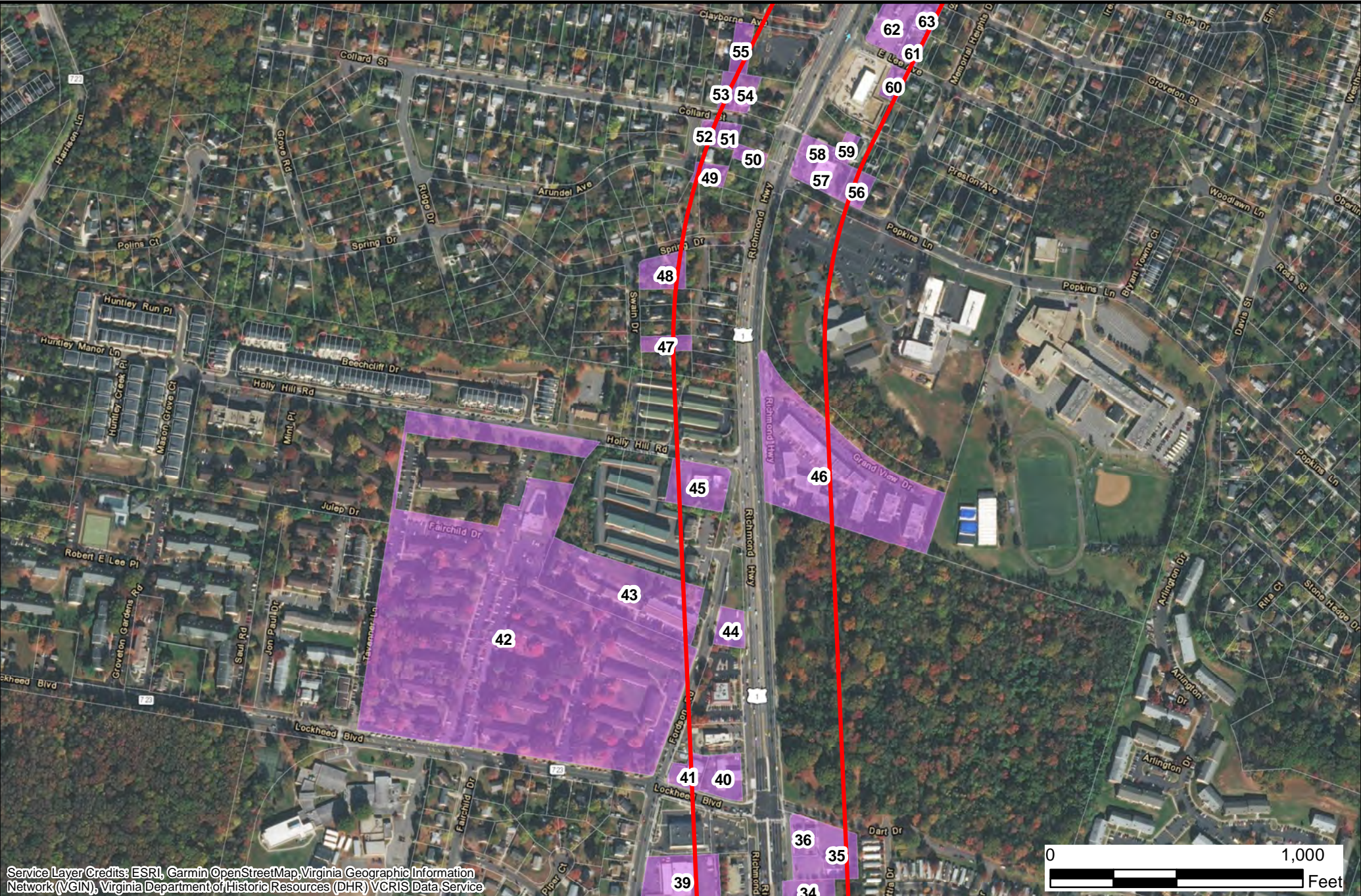


Map 7



Richmond Highway
 Bus Rapid Transit Program
**Newly Identified
 Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR) VCRIS Data Service

- Area of Potential Effects (APE)
- Newly Identified Historic Architectural Resource
- Potential Historic District

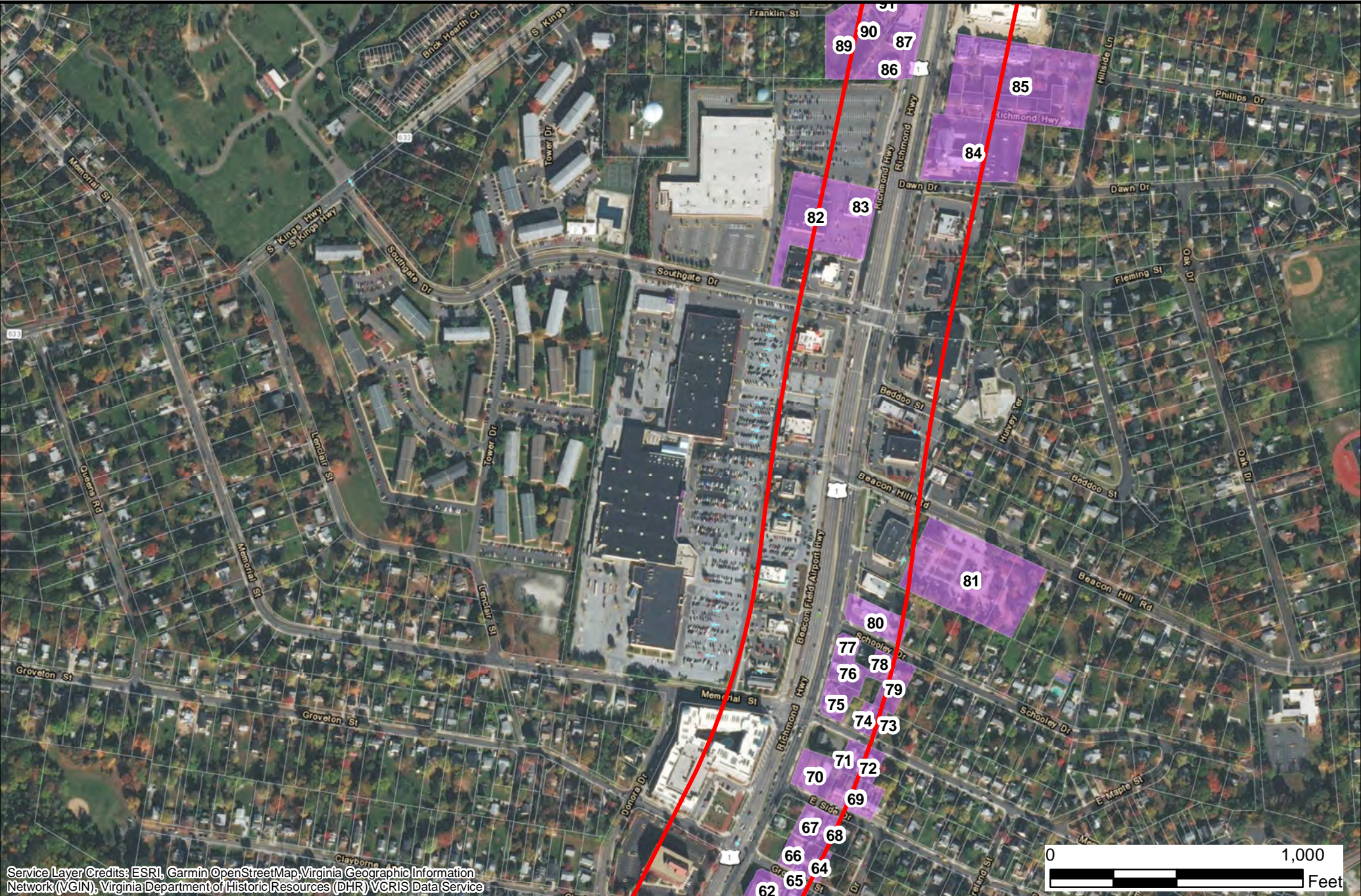


Map 8






Richmond Highway
 Bus Rapid Transit Program
**Newly Identified
 Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District

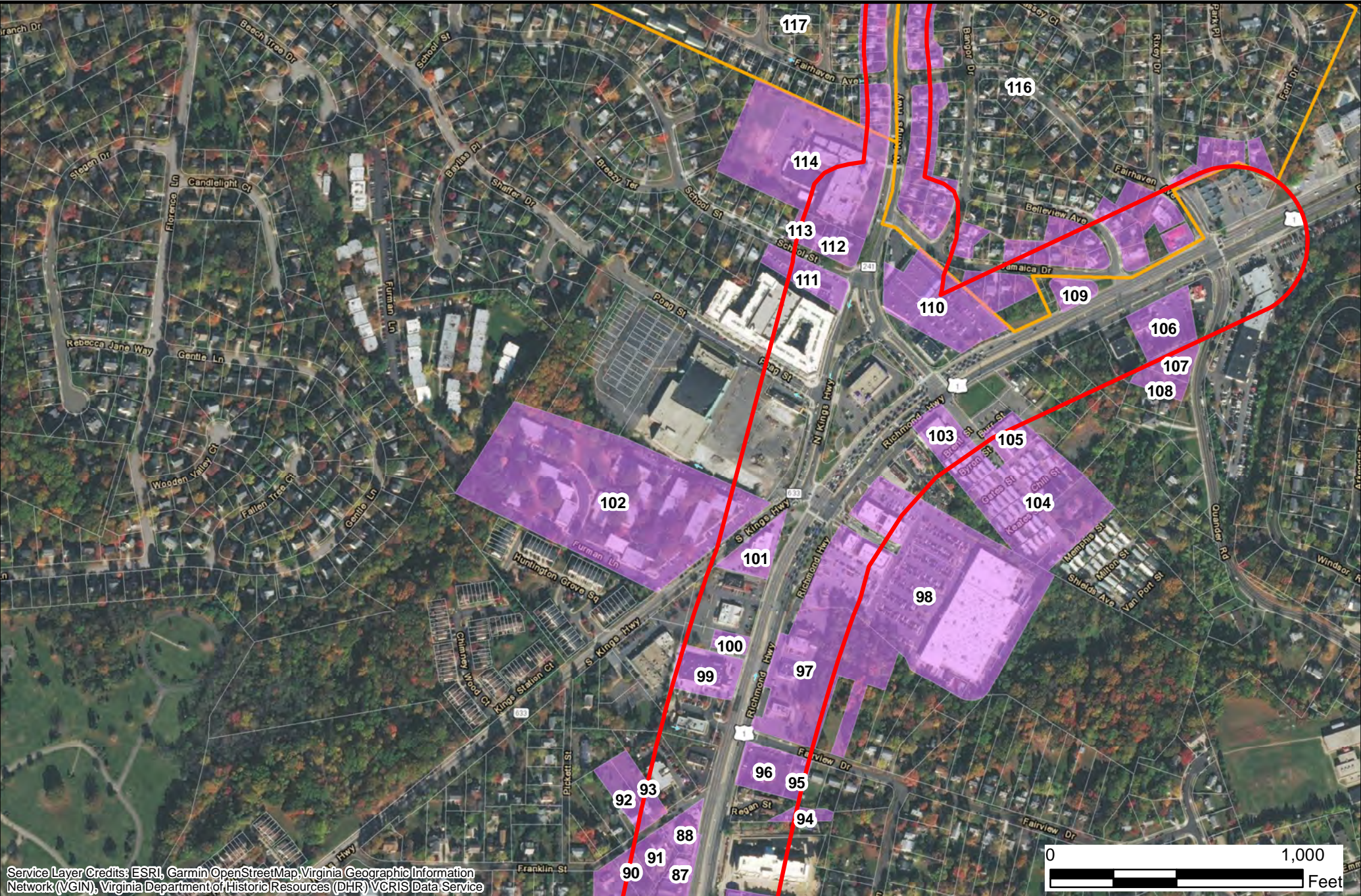


Map 9






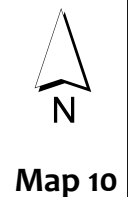
Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



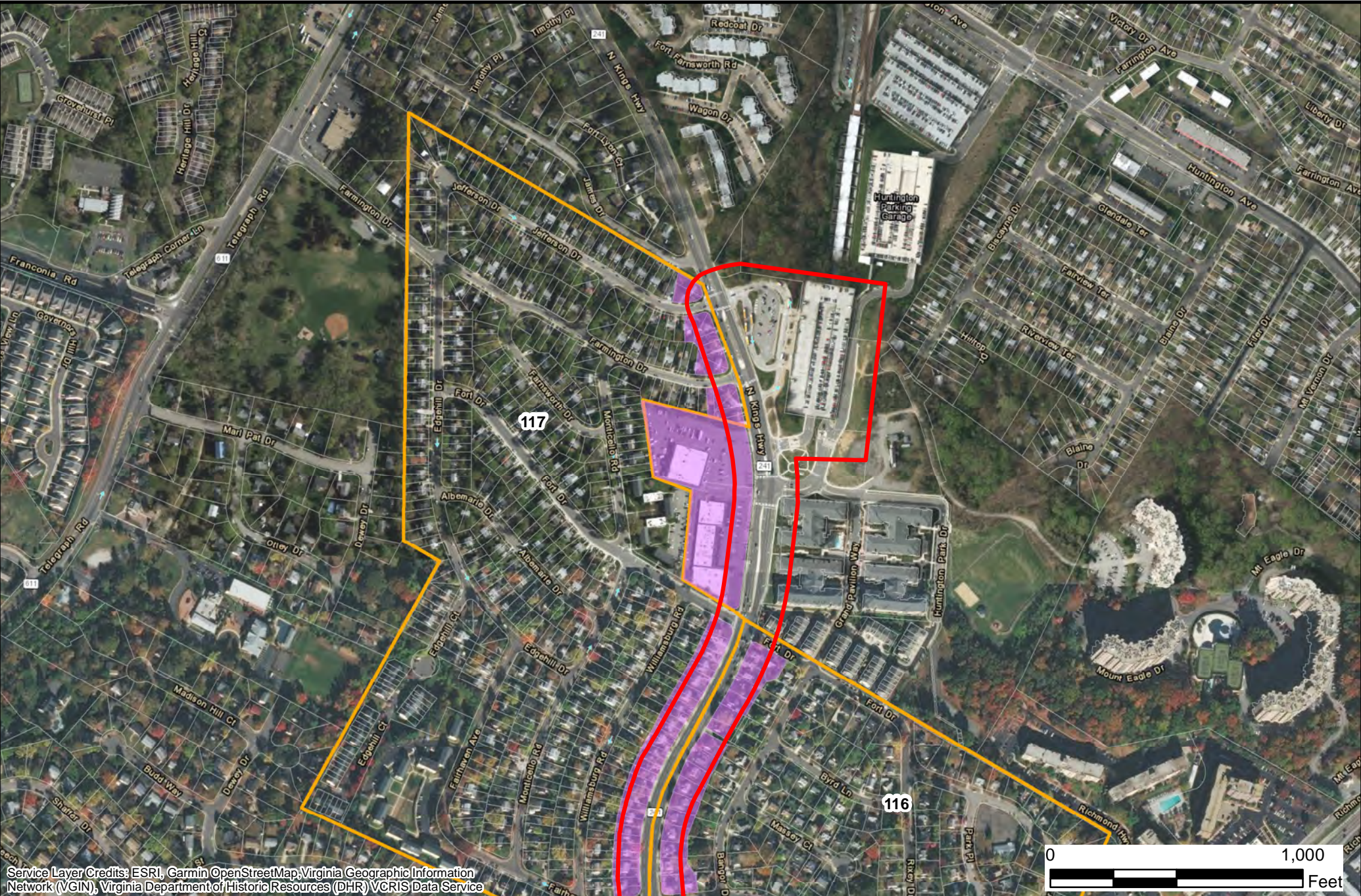
Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District






Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB



Service Layer Credits: ESRI, Garmin OpenStreetMap, Virginia Geographic Information Network (VGIN), Virginia Department of Historic Resources (DHR), VCRIS Data Service

-  Area of Potential Effects (APE)
-  Newly Identified Historic Architectural Resource
-  Potential Historic District



Map 11



Richmond Highway
Bus Rapid Transit Program
**Newly Identified
Historic Architectural Resources**

Date: 8/20/2018 Prepared By: MB

Attachment G

Invited Consulting Parties

Agency/Organization	Contact
Delaware Nation (Federally Recognized)	Ms. Deborah Dotson, Tribal President Ms. Kim Penrod, Director of Cultural Resources
Chickahominy Indian Tribe (State and Federally Recognized)	Mr. Stephen Adkins, Chief
Chickahominy Indians Eastern Division (State and Federally Recognized)	Mr. Gerald A. Stewart, Assistant Chief
Upper Mattaponi Indian Tribe (State and Federally Recognized)	Mr. W. Frank Adams, Chief
Monacan Indian Nation (State and Federally Recognized)	Mr. Dean Branham, Chief
Nansemond Indian Nation (State and Federally Recognized)	Mr. Lee Lockamy, Chief
Pamunkey Tribe (State and Federally Recognized)	Mr. Robert Gray, Chief
Rappahannock Tribe (State and Federally Recognized)	Ms. G. Anne Richardson, Chief
Department of the Army (Fort Belvoir)	Lt. Col. Christopher Tomlinson
Fairfax County Government, Department of Planning and Zoning	Mr. Fred Selden
Fairfax County Park Authority	Ms. Elizabeth Crowell, Manager, Heritage Resources Division
Gum Springs Historical Society	Mr. Ronald Chase, Director
National Park Service, Washington Rochambeau National Historic Trail	Mr. Joel Gorder, Regional Environmental Coordinator
National Trust for Historic Preservation (Woodlawn Plantation)	Mr. Ross M. Bradford, Senior Associate General Counsel
Pillar Church of Woodlawn	Pastor Brian Collison
The Historical Society of Fairfax County, Virginia	Mr. Paul Kohlenberger, President
Virginia Department of Transportation	Ms. Anissa Brown, District Assistant Environmental Manager



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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www.dhr.virginia.gov

November 14, 2018

Daniel Koenig
Environmental Protection Specialist, Region III
U.S Department of Transportation – Federal Transit Administration
1200 New Jersey Avenue SE
East Building E56-202
Washington, DC 20590

Re: The Richmond Highway Bus Rapid Transit Program
Fairfax County
DHR Project No. 2018-0722
Federal Transit Administration Letter Received October 15, 2018

Dear Mr. Koenig:

Thank you for requesting comments from the Virginia Department of Historic Resources (DHR) on the proposed Area of Potential Effects (APE) and preliminary identification of historic properties for the above referenced project. We understand that the proposed project includes the construction of new median lanes; nine associated stations; road widening; allotted space for bike facilities, trails and walkways; and will include both dedicated and mixed traffic lanes. DHR offers the following comments:

Previously Identified Resources: There were 135 previously recorded resources found within the APE. Ninety-three (93) of those have been determined and been concurred upon by DHR in the last five years as being ineligible for listing on the National Register of Historic Places (NRHP); two (2) have been updated as demolished; and seven (7) are NRHP-listed or have been determined and been concurred upon by DHR in the last five years as NRHP-eligible. Those seven (7) NRHP-listed and eligible resources are:

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Northern Region Office
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Tel: (540) 868-7029
Fax: (540) 868-7033

Eastern Region Office
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- Woodlawn Plantation (DHR ID # 029-0056) NRHP-listed;
- The Woodlawn Plantation Cultural Landscape Historic District (DHR ID # 029-5181). Please note that this was listed on the Virginia Landmarks Register (VLR) 09/20/2018;
- Woodlawn Stables (DHR ID #029-5181-0005), individually eligible and contributing to an eligible historic district;
- Mount Vernon High School (DHR ID #029-0230), Please note that this was listed on the VLR 12/14/2017 and on the NRHP 05/11/2018;
- The Camp A.A. Humphreys Pump Station and Filter Building (DHR ID #029-0096) individually VLR-listed and contributing to a VLR-listed historic district, although not within the contiguous district boundaries, nor is the district within the APE ;
- The Fort Belvoir Military Railroad Historic District Corridor (DHR ID #029-5724) VLR-listed; and
- The Fort Belvoir Military Railroad Track Bed (DHR ID #029-5648), contributing to VLR-listed historic district.

FTA recommends the remaining thirty-three (33) previously recorded, unevaluated resources for reconnaissance-level survey. 117 newly identified resources will reach the age of 50 years old by the Phase II advertisement date for this project in 2025. These 117 newly identified resources are being recommended for a reconnaissance-level survey and our comments on the proposed strategy are provided in the next section. We agree with the FTA definition of the APE, historic properties included therein and the stated approach to conduct a reconnaissance-level survey on the previously recorded, unevaluated resources.

Alternative Survey Methodology for Historic Districts: There are two (2) newly identified areas of post-WWII homes, located in the northern APE, east and west of North King's Highway, which are two separate potential historic districts. FTA proposes to survey these on a neighborhood level versus each property individually. This will be done by looking at representative property types, as well as the neighborhood design and features. The potential historic districts will be recorded through photo documentation of typical house forms, notes and site plans. There will be one (1) VCRIS entry per neighborhood. DHR approves of this approach to surveying these two (2) neighborhoods.

Invited Consulting Parties: DHR has no additional suggestions to the provided list of those copied as consulting parties. Other potential interested parties that FTA could reach out to are the Mount Vernon Ladies Association, Virginia Council on Indians and Friends of Huntley Meadows Park.

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In sum, this letter provides our concurrence with the FTA definition of the APE and identification to date of historic properties for the project. Future identification efforts should be expanded to include archaeological resources within the Limits of Disturbance.

We look forward to continued consultation with the FTA and the other consulting parties as the project progresses. Should you have any questions regarding archaeology, please contact Roger Kirchen at (804) 482-6091. Should you have additional questions, please contact me at (804) 482-6092, or via email at adrienne.birge-wilson@dhr.virginia.gov.

Sincerely,



Adrienne Birge-Wilson, Architectural Historian
Review and Compliance Division

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FAIRFAX COUNTY PARK AUTHORITY

12055 Government Center Parkway, Suite 927 • Fairfax, VA 22035-5500
703-324-8700 • Fax: 703-324-3974 • www.fairfaxcounty.gov/parks

May 17, 2019

Douglas C. Miller
Fairfax County Department of Transportation
4050 Legato Road
Fairfax, VA 22033

Dear Doug,

Thank you for the opportunity of reviewing the *Richmond Highway Bus Rapid Transit Project: ARCHAEOLOGICAL ASSESSMENT TECHNICAL REPORT* prepared by Rummel, Klepper & Kahl, LLP (RK&K). Overall, the Archaeological and Collections Branch concurs with the findings of the report, however we do have some additions, comments, and recommendations that we will list below.

The Archaeological Assessment recommended three previously identified, unevaluated archaeological sites for further testing. These are Sites 44FX0213, 44FX1211, and 44FX3256, which should be evaluated to their eligibility for inclusion in the National Register of Historic Places. They also recommended evaluation and possible data recovery for Site 44FX1810. The Archaeology and Collections Branch concurs with these recommendations.

The Archaeological Assessment also recommended that Survey Areas A-I be subject to Phase I archaeological survey. Of particular note, Survey Areas A, B, and C are located in the boundaries of Gum Springs, a historic free black settlement founded by West Ford, one of George Washington's slaves, who was freed. Additional information regarding Gum Springs would contribute to our knowledge of this important Fairfax County historic location. The Archaeology and Collections Branch concurs with the recommendation of further work in Survey Areas A-I.

In the Archaeological Assessment, RK&K identified an Area of Potential Effects for Archaeology measuring 200 feet in width. This corridor seems adequate to address impacts to potential resources from the installation of the BRT lane(s) and any widening of the road. Of note, however, there is no information included as to the locations of the proposed stations or for any construction staging areas. We understand that these locations have likely not been identified as of yet, however when they are, they should be subject to archaeological survey to determine the presence or absence of archaeological resources. Should potentially significant



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archaeological resources be present, they should be evaluated for their eligibility for inclusion in the National Register of Historic Places.

Should you have any further questions or comments, please do not hesitate to contact me at (703) 246-5758.

Sincerely,

Liz

Elizabeth A. Crowell, Ph.D.
Archaeology and Collections Branch Manager
Fairfax County Park Authority
James Lee Center
2855 Annandale Road
Falls Church, VA 22042



The Delaware Nation

Cultural Resources /106 Department

31064 State Highway 281

Anadarko, OK 73005

Phone (405)247-2448 Fax (405) 247-8905

23 May 2019

To Whom It May Concern:

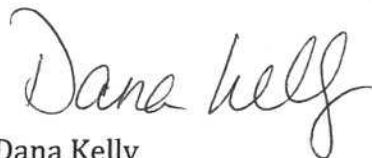
The Delaware Nation Historic Preservation Department received correspondence regarding the following referenced project(s).

**Project: Fairfax County Richmond Highway Bus Rapid Transit Program
DHR No. 2018-072**

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter during prior to European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger cultural, or religious sites of interest to the Delaware Nation. Please continue with the project as planned keeping in mind during construction should an archaeological site or artifacts inadvertently be uncovered, all construction and ground disturbing activities should immediately be halted until the appropriate state agencies, as well as this office, are notified (within 24 hours), and a proper archaeological assessment can be made.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Historic Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405/247-2448.



Dana Kelly

Historic Preservation/106 Asst.

Delaware Nation

31064 State Highway 281

Po Box 825

Anadarko, OK 73005

Ph. 405-247-2448

dkelly@delawarenation.com



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Department of Historic Resources

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June 3, 2019

Mr. Daniel Koenig
Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

Re: Fairfax County Richmond Highway Bus Rapid Transit Program – Survey
Fairfax County
DHR File No. 2018-0722

Dear Mr. Koenig:

The Department of Historic Resources (DHR) received the *Historic Architectural Survey Technical Report for the Fairfax County Department of Transportation – April 2019* and the *Archaeological Assessment* for our review and comment. The material met our QA/QC standards on May 13, 2019. The report was prepared by RK&K for Fairfax County Department of Transportation on behalf of the Federal Transit Administration (FTA). We understand that the proposed project includes the construction of new median lanes; nine associated stations; road widening; allotted space for bike facilities, trails and walkways; and will include both dedicated and mixed traffic lanes. DHR offers the following comments:

Architectural Resources

The architectural study surveyed a total of 254 architectural resources within the Area of Potential Effects (APE); 135 previously recorded and 110 newly identified. Of the previously recorded resources surveyed, four (4) are listed, have been evaluated eligible or have been evaluated as potentially eligible for the Virginia Landmarks Register (VLR) and the National Register of Historic Places (NRHP), within the last five years by DHR staff:

- Woodlawn Plantation (DHR ID # 029-0056) NRHP-listed;

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- Mount Vernon High School (DHR ID #029-0230), listed on the VLR 12/14/2017 and on the NRHP 05/11/2018;
- The Woodlawn Plantation Cultural Landscape Historic District (DHR ID # 029-5181), listed on the Virginia Landmarks Register (VLR) 09/20/2018;
- Woodlawn Stables (DHR ID #029-5181-0005), individually eligible and contributing to an eligible historic district; and
- The Fort Belvoir Military Railroad Historic District Corridor (DHR ID #029-5724) VLR-listed.

There are 34 remaining previously recorded that were re-evaluated, of which two (2) are recommended eligible:

- The Camp A.A. Humphreys Pump Station and Filter Building (DHR ID #029-0096) individually VLR-listed and contributing to a VLR-listed historic district; and
- The St. Louis Catholic Church and School (DHR ID #029-5149).

Ten of the 34 resources have been demolished and 22 are recommended ineligible.

Of the 110 newly identified resources, 109 are recommended ineligible and one (1) is recommended eligible (A & A Rentals; former Fire Station; DHR ID #029-6432). Please see the attached tables regarding all eligibility recommendations.

DHR requests the inclusion of the historic Gum Springs community as a newly identified resource, due to its proximity, unknown boundaries and unknown eligibility. It is unclear whether this is adjacent to or within the APE. Gum Springs should be added to the survey, delineated and inputted into VCRIS. Please also note that several of the dates of construction in the tables are incorrect and should be changed to reflect the VCRIS survey data.

In a November 14, 2018, letter, DHR approved an alternative survey methodology for the two post-WWII historic districts within the APE (Fair Haven; DHR ID #029-6348 and Jefferson Manor; DHR ID #029-6349). Based on the results of the survey, additional information is needed to determine if the neighborhoods are NRHP-eligible under the existing Post-WWII suburbs National Register Multiple Property Document (MPD).

In addition, DHR concurs with the following items from the May 31, 2019, letter from Fairfax County:

- Additional context regarding the significance of Route 1 in the 20th century, in terms of transportation history, should be appended into the survey property records when appropriate, as it applies to the resource. If the additional context could potentially change eligibility (as an individual/contributing/MPD listing), it needs to be formally reevaluated and submitted to DHR for concurrence;
- The Fairfax County History Commission should be consulted for direct/indirect effects to NRHP-eligible or listed properties;

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- The Archaeological Collections Branch of Fairfax County Parks and Recreation should be consulted regarding ground disturbances within the APE.

We, furthermore, encourage the FTA to work closely with the Fairfax County Department of Planning and Zoning regarding their additional comments from the May 31, 2019, letter.

Archaeological Resources

The *Archaeological Assessment* identified 20 previously recorded archaeological sites within the Field Review Area. Four (4) recorded sites are unevaluated for VLR/NRHP listing; however one (1) unevaluated site (44FX3252) has been destroyed. We concur that recorded sites 44FX0213, 44FX1211, and 44FX3256 warrant additional testing. Further, we concur that site 44FX1810, which has been previously recommended eligible for VLR/NRHP listing, warrants further evaluation or mitigative action. Finally, we concur with the archaeological probability model for the unsurveyed areas and the recommended Phase I survey of the nine (9) survey areas (A-I).

We look forward to continued consultation with the FTA and the other consulting parties as the project progresses. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for architectural issues) via email at adrienne.birge-wilson@dhr.virginia.gov or Roger Kirchen (for archaeology) at roger.kirchen@dhr.virginia.gov.

Sincerely,



Adrienne Birge-Wilson, Architectural Historian
Review and Compliance Division

cc: Vanessa Aguayo T., Fairfax County Department of Transportation
Douglas C. Miller, Fairfax County Department of Transportation
Fran Selden, Fairfax County
Laura Arseneau, Fairfax County

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DHR ID #	Resource Name/Address	Eligibility - FTA April 2019	Eligibility - DHR May 2019
<i>Previously Recorded</i>			
029-0096	Camp A.A. Humphreys Pump Station and Filter Building/9155 Richmond Highway	Eligible	VLR Listed (6/19/1996); NRHP Nomination (2/1/1996, not listed); associated with the Fort Belvoir Historic District (029-0209)
029-0156	Krispy Kreme Doughnut Co./Sign, 6328 Richmond Highway	Not Eligible	Not Eligible
029-5147	House/7024 Richmond Highway	Not Eligible	Not Eligible
029-5148	House/7020 Richmond Highway	Not Eligible	Not Eligible
029-5149	St. Louis Catholic Church and School	Eligible	Eligible
029-5150	House/3101 Collard Street	Not Eligible	Not Eligible
029-5151	House/3100 Collard Street	Not Eligible	Not Eligible
029-5152	Walker House/6950 Richmond Highway	Not Eligible	Not Eligible
029-5153	Hatmaker House/2923 E. Lee Avenue	Demolished	Demolished
029-5154	House/6835 Richmond Highway	Not Eligible	Not Individually Eligible
029-5155	House/6831 Richmond Highway	Not Eligible	Not Individually Eligible
029-5156	Mount Vernon-Lee Chamber of Commerce/6821 Richmond Highway	Not Eligible	Not Individually Eligible
029-5157	Hair Improvements/2817 Schooley Drive	Not Eligible	Not Individually Eligible
029-5158	Whiz Cleaners/6701 Richmond Highway	Not Eligible	Not Individually Eligible
029-5159	Fairview Motel/6421 Richmond Highway	Demolished	Demolished
029-5160	Alexandria Motel/6411 Richmond Highway	Not Eligible	Not Eligible
029-5161	Dawson's Cleaners/6410 Richmond Highway	Not Eligible	Not Eligible
029-5162	House/6215 Richmond Highway	Not Eligible	Not Eligible
029-5163	House/6213 Richmond Highway	Not Eligible	Not Eligible
029-5164	House/6211 Richmond Highway	Not Eligible	Not Eligible
029-5165	Moon Inn Hotel/6140 Richmond Highway	Not Eligible	Not Eligible
029-5166	Hawaiian Pool & Spa/6130 Richmond Highway	Not Eligible	Not Eligible
029-5424	Fort Belvoir Railroad Bridge (Bridge No. 1433)/Railroad spanning Richmond Highway	Demolished	Demolished

DHR ID #	Resource Name/Address	Eligibility - FTA April 2019	Eligibility - DHR May 2019
029-5425	Vehicle Bridge, Facility No. 1443/Gunston Road spanning Richmond Highway	Demolished	Demolished
029-5428	Installation Sign, Facility No. 1808/Richmond Highway and Belvoir Road	Not Eligible	Not Eligible
029-5648	Fort Belvoir Military Railroad Track Bed/Fort Belvoir	Demolished (within APE)	Demolished (within APE)
029-5682	The Courts at Belvoir/9140 Richmond Highway	Not Eligible	Not Eligible
029-5683	Commercial Building/9150-9160 Richmond Highway	Demolished	Demolished
029-5684	House/9170 Richmond Highway	Demolished	Demolished
029-5690	House/9135 Anderson Lane	Demolished	Demolished
029-5711	Culvert/under Richmond Highway, east of Fairfax County Parkway (SR 7100)	Demolished	Demolished
029-5712	Culvert/under Richmond Highway at Fort Belvoir Railroad Bridge	Demolished	Demolished
029-6045	Woodlawn Methodist Church/7730 Fordson Road	Not Eligible	Not Eligible
029-6247	Evolution Home/Commercial Building, 6239 Shields Avenue	Not Eligible	Not Eligible
<i>Newly Identified</i>			
029-6350	Apartment Building, 9190 Richmond Highway	Not Eligible	Not Eligible
029-6351	Restaurant, 8685 Richmond Highway	Not Eligible	Not Eligible
029-6352	Office, 8623 Richmond Highway	Not Eligible	Not Eligible
029-6353	Commercial Building, 8143 Richmond Highway	Not Eligible	Not Eligible
029-6354	Store, 8010 Richmond Highway	Not Eligible	Not Eligible
029-6355	Commercial Building, 8000 Richmond Highway	Not Eligible	Not Eligible
029-6356	Shopping Center, 7846 Richmond Highway	Not Eligible	Not Eligible
029-6357	Shopping Center, 7840 Richmond Highway	Not Eligible	Not Eligible
029-6358	Shopping Center, 7770 Richmond Highway	Not Eligible	Not Eligible
029-6359	Shopping Center, 7714 Richmond Highway	Not Eligible	Not Eligible
029-6360	Shopping Center, 7694 Richmond Highway	Not Eligible	Not Eligible
029-6361	Single Dwelling, 7712 Fordson Road	Not Eligible	Not Eligible

DHR ID #	Resource Name/Address	Eligibility - FTA April 2019	Eligibility - DHR May 2019
029-6362	Single Dwelling, 2905 Boswell Avenue	Not Eligible	Not Eligible
029-6363	Office, 7627 Richmond Highway	Not Eligible	Not Eligible
029-6364	Commercial Building, 7623 Richmond Highway	Not Eligible	Not Eligible
029-6365	Service Station, 7619 Richmond Highway	Not Eligible	Not Eligible
029-6366	Single Dwelling, 2912 Woodlawn Trail	Not Eligible	Not Eligible
029-6367	Restaurant, 7531 Richmond Highway	Not Eligible	Not Eligible
029-6368	Commercial Building, 7525 Richmond Highway	Not Eligible	Not Eligible
029-6369	Service Station, 7501 Richmond Highway	Not Eligible	Not Eligible
029-6370	Service Station, 7600 Richmond Highway	Not Eligible	Not Eligible
029-6371	Bank, 7524 Richmond Highway	Not Eligible	Not Eligible
029-6372	Shopping Center, 7520 Richmond Highway	Not Eligible	Not Eligible
029-6373	Shopping Center, 7508 Richmond Highway	Not Eligible	Not Eligible
029-6374	Shopping Center, 7500 Richmond Highway	Not Eligible	Not Eligible
029-6375	Service Station, 7419 Richmond Highway	Not Eligible	Not Eligible
029-6376	Restaurant, 7405 Richmond Highway	Not Eligible	Not Eligible
029-6377	Shopping Center, 7329 Richmond Highway	Not Eligible	Not Eligible
029-6378	Commercial Building, 7321 Richmond Highway	Not Eligible	Not Eligible
029-6379	Restaurant, 7305 Richmond Highway	Not Eligible	Not Eligible
029-6380	Service Station, 7303 Richmond Highway	Not Eligible	Not Eligible
029-6381	Store, 7330 Richmond Highway	Not Eligible	Not Eligible
029-6382	Restaurant, 7324 Richmond Highway	Not Eligible	Not Eligible
029-6383	Office, 7309 Fordson Road	Not Eligible	Not Eligible
029-6384	Service Station, 7302 Richmond Highway	Not Eligible	Not Eligible
029-6385	Store, 3100 Lockheed Boulevard	Not Eligible	Not Eligible
029-6386	Complex, 3808 Lockheed Boulevard	Not Eligible	Not Eligible
029-6387	Motel, 7212 Fordson Road	Not Eligible	Not Eligible
029-6388	Commercial Building, 7210 Richmond Highway	Not Eligible	Not Eligible

DHR ID #	Resource Name/Address	Eligibility - FTA April 2019	Eligibility - DHR May 2019
029-6389	Restaurant, 7120 Richmond Highway	Not Eligible	Not Eligible
029-6390	Complex, 7131 Richmond Highway	Not Eligible	Not Eligible
029-6391	Single Dwelling, 7033 Swain Drive	Not Eligible	Not Eligible
029-6393	Single Dwelling, 3115 Arundel Avenue	Not Eligible	Not Eligible
029-6394	Single Dwelling, 7004 Richmond Highway	Not Eligible	Not Eligible
029-6395	Single Dwelling, 3105 Collard Street	Not Eligible	Not Eligible
029-6396	Single Dwelling, 3107 Collard Street	Not Eligible	Not Eligible
029-6397	Single Dwelling, 3106 Collard Street	Not Eligible	Not Eligible
029-6398	Single Dwelling, 3104 Collard Street	Not Eligible	Not Eligible
029-6399	Single Dwelling, 3101 Clayborne Avenue	Not Eligible	Not Eligible
029-6400	Single Dwelling, 3014 Popkins Lane	Not Eligible	Not Eligible
029-6401	Office, 6969 Richmond Highway	Not Eligible	Not Individually Eligible
029-6402	Commercial Building, 6951 Richmond Highway	Not Eligible	Not Eligible
029-6403	Single Dwelling, 3007 Preston Avenue	Not Eligible	Not Eligible
029-6404	Single Dwelling, 2917 E Lee Avenue	Not Eligible	Not Eligible
029-6405	Single Dwelling, 2916 E Lee Avenue	Not Eligible	Not Eligible
029-6406	Office, 6911 Richmond Highway	Not Eligible	Not Eligible
029-6407	Single Dwelling, 2917 Groveton Street	Not Eligible	Not Eligible
029-6408	Single Dwelling, 2912 Groveton Street	Not Eligible	Not Eligible
029-6409	Single Dwelling, 2916 Groveton Street	Not Eligible	Not Eligible
029-6410	Single Dwelling, 2922 Groveton Street	Not Eligible	Not Eligible
029-6411	Single Dwelling, 2921 E Side Drive	Not Eligible	Not Eligible
029-6412	Single Dwelling, 2915 E Side Drive	Not Eligible	Not Eligible
029-6413	Complex, 2900 E Side Drive	Not Eligible	Not Eligible
029-6414	Service Station, 6825 Richmond Highway	Not Eligible	Not Eligible
029-6415	Single Dwelling, 2833 Memorial Street	Not Eligible	Not Eligible
029-6416	Single Dwelling, 2827 Memorial Street	Not Eligible	Not Eligible
029-6417	Single Dwelling, 2832 Memorial Street	Not Eligible	Not Eligible

DHR ID #	Resource Name/Address	Eligibility - FTA April 2019	Eligibility - DHR May 2019
029-6418	Single Dwelling, 2836 Memorial Street	Not Eligible	Not Eligible
029-6419	Service Station, 6817 Richmond Highway	Not Eligible	Not Eligible
029-6420	Commercial Building, 6809 Richmond Highway	Not Eligible	Not Eligible
029-6421	Office, 6801 Richmond Highway	Not Eligible	Not Individually Eligible
029-6422	Single Dwelling, 2813 Schooley Drive	Not Eligible	Not Eligible
029-6423	Single Dwelling, 2809 Schooley Drive	Not Eligible	Not Eligible
029-6424	Commercial Building, 6737 Richmond Highway	Not Eligible	Not Eligible
029-6425	Single Dwelling, 2801 Beacon Hill Road	Not Eligible	Not Eligible
029-6426	Shopping Center, 6612 Richmond Highway	Not Eligible	Not Eligible
029-6427	Restaurant, 6610 Richmond Highway	Not Eligible	Not Eligible
029-6428	Church, 6511 Richmond Highway	Not Eligible	Not Eligible
029-6429	Complex, 6429 Richmond Highway	Not Eligible	Not Eligible
029-6430	Restaurant, 6510 Richmond Highway	Not Eligible	Not Eligible
029-6431	Shopping Center, 6426 Richmond Highway	Not Eligible	Not Eligible
029-6432	Fire Station, 6416 Richmond Highway	Eligible	Eligible
029-6433	Single Dwelling, 2905 Franklin Street	Not Eligible	Not Eligible
029-6434	Single Dwelling, 2829 Franklin Street	Not Eligible	Not Eligible
029-6435	Single Dwelling, 2821 Franklin Street	Not Eligible	Not Eligible
029-6436	Single Dwelling, 2820 Franklin Street	Not Eligible	Not Eligible
029-6437	Single Dwelling, 2816 Franklin Street	Not Eligible	Not Eligible
029-6438	Single Dwelling, 6415 Richmond Highway	Not Eligible	Not Eligible
029-6439	Single Dwelling, 2701 Fairview Drive	Not Eligible	Not Eligible
029-6440	Commercial Building, 6401 Richmond Highway	Not Eligible	Not Eligible
029-6441	Restaurant, 6319 Richmond Highway	Not Eligible	Not Eligible
029-6442	Shopping Center, 6301 Richmond Highway	Not Eligible	Not Eligible
029-6443	Shopping Center, 6328 Richmond Highway	Not Eligible	Not Eligible
029-6444	Bank, 6324 Richmond Highway	Not Eligible	Not Eligible

DHR ID #	Resource Name/Address	Eligibility - FTA April 2019	Eligibility - DHR May 2019
029-6445	Commercial Building, 6300 Richmond Highway	Not Eligible	Not Eligible
029-6446	Complex, 6300 S Kings Highway	Not Eligible	Not Eligible
029-6447	Shopping Center, 6229 Richmond Highway	Not Eligible	Not Eligible
029-6448	Complex, 6240 Shields Avenue	Not Eligible	Not Eligible
029-6449	Restaurant, 6151 Richmond Highway	Not Eligible	Not Eligible
029-6450	Single Dwelling, 6216 Quander Road	Not Eligible	Not Eligible
029-6451	Single Dwelling, 6220 Quander Road	Not Eligible	Not Eligible
029-6452	Commercial Building, 6200 Richmond Highway	Not Eligible	Not Eligible
029-6453	Shopping Center, 6220 Richmond Highway	Not Eligible	Not Eligible
029-6454	Shopping Center, 6128 N Kings Highway	Not Eligible	Not Eligible
029-6455	Church, 6120 N Kings Highway	Not Eligible	Not Eligible
029-6456	Single Dwelling, 2712 School Street	Not Eligible	Not Eligible
029-6457	School, 6116 N Kings Highway	Not Eligible	Not Eligible
029-6458	Shopping Center, 5834 N Kings Highway	Not Eligible	Not Eligible
029-6348	Fair Haven	Not Eligible	Additional Information Needed
029-6349	Jefferson Manor	Not Eligible	Additional Information Needed



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

November 6, 2019
Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

**Re: Addendum to the Historic Architectural Survey and Updates to the
Archaeological Assessment, Richmond Highway Bus Rapid Transit Project,
Fairfax County, Virginia; DHR Project No. 2018-0722**

Dear Ms. Birge-Wilson:

The Fairfax County Department of Transportation (FCDOT) is supporting the Federal Transit Administration (FTA) with Section 106 consultation for the Richmond Highway Bus Rapid Transit Project. At this time, the FCDOT and FTA seek concurrence from your office on the identification of historic properties for the project.

FCDOT, in coordination with FTA, is proposing to implement bus rapid transit (BRT) service extending along North Kings Highway / VA 241 and Richmond Highway / U.S. Route 1 from Huntington Metrorail Station in the north to U.S. Army Garrison Fort Belvoir in the south. The project includes the construction of new BRT-dedicated median lanes; nine BRT stations; streetscape improvements; and accommodations for walkways and bicycle facilities. The project would operate in both dedicated and mixed traffic lanes within the project limits.

In accordance with 36 CFR Part 800.3, the FTA initiated Section 106 consultation with the Virginia Department of Historic Resources (DHR) via letter dated October 4, 2018. Included in that submission was a project description, area of potential effects (APE), preliminary information regarding known historic resources, and a list of potential consulting parties to invite. Your office responded via letter dated November 14, 2018. In April 2019, a historic architectural survey and an archaeological assessment to identify historic properties that could potentially be affected by the undertaking were submitted to DHR and other consulting parties for review and comment. The current architectural addendum report and archaeological update were prepared to address comments received from DHR via letter dated June 3, 2019, as well as those comments received from other consulting parties and the general public in regard to the identification of historic properties.

Enclosed is the Addendum to the Historic Architectural Survey Technical Report prepared for the project, as well as relevant additional materials including digital copies of the report and photographs on CD, and the Virginia Cultural Resource Information System (V-CRIS) forms and associated site plans and archival photographs. The update to the Archaeological

Assessment Technical Report prepared for the project is also enclosed including digital copies of the report.

This project documents additional work related to survey and evaluation efforts to identify historic properties, i.e., those listed or considered eligible for listing in the National Register of Historic Places (NRHP), that could potentially be affected by the undertaking. The survey work was conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665, as amended), as implemented by the procedures for the *Protection of Historic Properties* (36 CFR Part 800, as revised), and the *DHR Guidelines for Conducting Historic Resources Survey in Virginia* (DHR 2017). All work was completed or supervised by staff that meet or exceed the respective professional qualifications as specified in 36 CFR Part 61.

As part of the addendum, additional historic context was prepared for two post-World War II residential neighborhoods, Fair Haven (DHR No. 029-6348) and Jefferson Manor (DHR No. 029-6349), and the segment of Richmond Highway / U.S. Route 1 (DHR NO. 029-5708) located within the project APE. Additionally, Gum Springs (DHR No. 029-6581) was delineated as a newly identified resource.

In total for the project, 246 historic architectural resources, 135 previously identified and 111 newly identified, are located within the historic architectural APE. Of the 135 previously identified resources, 100 have been evaluated by DHR staff within the last five years and were not reevaluated. Ninety-four of the 100 resources have been evaluated and concurred not eligible for listing in the NRHP by DHR staff. Two of the 100 resources have been updated as demolished by recent surveys. Four of the 100 resources are listed or have been evaluated as being eligible for listing in the NRHP by DHR staff within the last five years: Woodlawn Plantation (DHR No. 029-0056), Mount Vernon High School (DHR No. 029-0230), Woodlawn Cultural Landscape Historic District (DHR No. 029-5181), and Fort Belvoir Military Railroad Historic District (DHR No. 029-5724). The remaining 35 previously identified resources were reevaluated. Of these resurveyed resources, two are recommended eligible for listing in the NRHP: Camp A. A. Humphreys Pump Station and Filter Building (DHR No. 029-0096) and St. Louis Catholic Church and School (DHR No. 029-5149). Ten of the resources have been demolished since last being evaluated. The remaining 23 resources are recommended not eligible for listing in the NRHP.

Background research was conducted to identify properties that will be 50 years of age by the planned advertisement date of 2025. This resulted in a search for all properties more than 43 years old (built in or before 1975) within the APE. A total of 111 newly identified resources were surveyed and evaluated. Of those, two are recommended eligible for listing in the NRHP: A&A Rentals (DHR No. 029-6432) and Fair Haven (DHR No. 029-6348). The remaining 109 are recommended not eligible for listing in the NRHP individually or as part of a historic district.

Overall, a total of eight historic properties were identified within the historic architectural APE for the project: Woodlawn Plantation (DHR No. 029-0056), Mount Vernon High School (DHR

No. 029-0230), Woodlawn Cultural Landscape Historic District (DHR No. 029-5181), Fort Belvoir Military Railroad Historic District (DHR No. 029-5724), Camp A. A. Humphreys Pump Station and Filter Building (DHR No. 029-0096), St. Louis Catholic Church and School (DHR No. 029-5149), A&A Rentals (DHR No. 029-6432), and Fair Haven (DHR No. 029-6348).

The update to the Archaeological Assessment, also enclosed, provides updated information regarding the field review area, as well as additional background research completed based on comments received from the public.

At this time, FCDOT and FTA seek concurrence from your office on the identification of historic properties for the project. If you have any questions or concerns, please contact Mr. Daniel Koenig at 202-366-8224, or via email at Daniel.Koenig@dot.gov, or Mr. Douglas Miller at 703-877-5750 or Douglas.Miller3@fairfaxcounty.gov.

Sincerely,



Vanessa Aguayo T., PE
Project Manager
Capital Projects & Traffic Engineering Div.
Fairfax County Department of Transportation



Douglas C. Miller
Environmental Specialist
Capital Projects & Traffic Engineering Div.
Fairfax County Department of Transportation

cc: Daniel Koenig, Federal Transit Administration
Erin Thompson, Delaware Nation
Christopher Landgraf, Department of the Army (Fort Belvoir)
Barbara Byron, Fairfax County Government, Department of Planning and Development
Elizabeth Crowell, Fairfax County Park Authority
Ross Bradford, National Trust for Historic Preservation
Anissa Brown, Virginia Department of Transportation
Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends
Ronald Chase, Gum Springs Historical Society

Enclosures: 1 Addendum to the Historic Architectural Survey Report, 1 Archaeological Assessment Report with update memorandum, 9 V-CRIS files, and CDs containing digital reports and photographs

December 2, 2019

Via email Transmission

Vanessa T. Aguayo and Douglas C. Miller
Fairfax County Department of Transportation
Fairfax, Virginia

Dear Ms. Aguayo and Mr. Miller:

On November 7, 2019, I received a copy of your letter and email transmittal to the Virginia State Historic Preservation Officer (SHPO) regarding the Federal Transit Authority's (FTA) compliance with Section 106 of the National Historic Preservation Act (NHPA) for the proposed Richmond Highway Bus Rapid Transit (BRT) undertaking. The message directed Consulting Parties to a link to FTA's recommendations and supporting documentation regarding properties within the BRT project's area of potential effect, and their eligibility for listing on the National Register of Historic Places. Although I was initially able to access the documentation, I can no longer, at this time, access it. Perhaps you can provide assistance.

I received the following message:

mccatlin@earthlink.net

You don't have access to this

Your sign-in was successful but you don't have permission to access this resource.

I had assumed I could return to the site via the link when I was ready to draft my comments. However, lacking access to the materials at this time has impeded my progress in reviewing and commenting within the specified timeframe. Further, you indicated in your message of November 7, 2019 that any problem of access should be reported to you by the following day, November 8, at which time I had not yet experienced the difficulty. Therefore, while necessarily preliminary, I am providing my comments at this time, to ensure that they will be considered within the specified timeframe. I do not know whether other Consulting Parties may have experienced any problems accessing the documentation, but I hope you will follow up with them to ensure they are not similarly affected.

Regarding the transmission of your request for comments from Consulting Parties, I assume your intention was to invite, or request, Consulting Parties to review and comment on the historic property identification documentation. However, the only indication of this expectation that I am aware of is your communication to Ms. Birge-Wilson, wherein you state: "Please note that we request all comments from consulting parties be submitted within 30 days, no later than December 9, 2019." Perhaps you contacted Consulting Parties separately and my email address was inadvertently omitted, or perhaps the transmission failed. However, if not, and if it is the

case that your communication addressed to the Virginia SHPO is intended to serve as your only means of informing Consulting Parties of their opportunity for comment, I would suggest that in the future, any request for comment would be clearer, and more likely to be noticed, if you were to address such communications directly to Consulting Parties.

Based on the distribution lists for your November 7, 2019, letter and email transmittal to the Virginia SHPO, it appears that my concern with respect to your agency's responsibility for outreach to additional potential stakeholders in the Section 106 process has not, at this time, been addressed. In an email message to you dated October 9, 2019, I reiterated this concern, which I had initially expressed at the BRT Section 106 consultation meeting of September 4, 2019. My message to you stated, in part:

Given the early stage of the BRT Section 106 review, when historic properties are still in the process of being identified, outreach to those with knowledge of local history and resources is important. Based on the invitees to the meeting of September 4, only three areas within the defined area of potential effect were represented by nongovernmental stakeholders: Woodlawn Meetinghouse, Woodlawn/Pope-Leighey (both included in the Woodlawn Cultural Landscape Historic District), and Gum Springs. Although I am grateful to be included as a Consulting Party, stakeholders and interested parties from all areas of the Route One corridor should also be provided an opportunity to be represented.

I hope you will be able to restore my access to the documentation to be reviewed. Nonetheless, my ability, and that of other Consulting Parties, to conduct a meaningful review would certainly also need to consider whether the documentation under review incorporates or considers the views of all appropriate participants. I would again respectfully suggest that these should include additional individuals or organizations who may be unaware of the status of Section 106 review for the BRT undertaking, but who may have knowledge of, or interest in, historic properties potentially affected by the project. Input from such sources could prove valuable to your agency's project planning, especially if considered at this early stage, which you have described as "preliminary" as recently as September 4, 2019.

At the meeting of September 4, participants discussed various outreach approaches and research methodologies. We discussed the potential benefits of conducting oral history interviews, with the goal of obtaining information about historic properties from knowledgeable members of the community, whether or not the interview subjects may choose to become Consulting Parties in the Section 106 process. If such outreach efforts have, in fact, since been undertaken by FTA or your agency in accordance with the assurances I believed were offered at the meeting, I request that you detail those efforts, and their results, as part of the information to be considered by Consulting Parties and the Virginia SHPO in our current review of the documentation you submitted to the SHPO. In addition, a record of the comments and discussions that took place at the Section 106 consultation meeting of September 4 should be provided to all participants.

If intended as fulfillment of 36 CFR 800.4(c)(2) of the Section 106 regulations, I believe your request to the Virginia SHPO on behalf of FTA for concurrence with FTA's recommendations regarding National Register eligibility to be premature. Although I was only able to take a preliminary look at the documentation before being locked out of access, I did read with concern the recommendations, attributed to FTA, that any and all potentially historic properties, taken individually or as a group, in the Gum Springs portion of the BRT area of potential effect are deemed ineligible for listing on the National Register. I particularly object to your ruling out, at this early stage in the Section 106 consultation process, the reasonable possibility that National Register eligibility can be fully supported through an appropriate level of investigation of the history of Gum Springs. Any such determination should take into consideration factors in the community's potential eligibility such as the long-term survival of cultural traditions, established during its beginnings as a free African American community nearly two centuries ago. In my initial review of your historic property identification documentation, I found no evidence that such an evaluation was done before you reached conclusions constituting FTA's formal recommendations to the Virginia SHPO regarding National Register eligibility.

The Alexandria Monthly Meeting of the Religious Society of Friends is a member and supporter of the Gum Springs Historical Society, as am I, as an individual member and volunteer. Our histories interrelate from the time period beginning in the 1840s and 1850s when Quakers from northern states relocated to the slave state of Virginia. Their strategy was to end slavery through the practice of progressive agriculture and the replacement of the plantation economy with small owner-operated farms, which they hoped would become a guiding light for the South as a whole. The Quakers and the free black populations of Gum Springs and Woodlawn – many of whom were descended from the enslaved people liberated through George Washington's last will and testament – were instrumental in achieving, and benefitting from, the substantial transformation of the agricultural economy in the Mount Vernon area of antebellum Fairfax County.

Gum Springs has long been recognized as a significant historically black enclave in Fairfax County. Its continued survival into the 21st century will depend, in part, on the preservation of the touchstones of its built environment: the contours of its layout, the buildings that house its religious and civic institutions, and the character of its familiar residential neighborhoods where generations of families have sustained one another as an evolving but cohesive community. In addition to its local significance, however, the national implications of Gum Springs' history, through its associations with the Washington family and Mount Vernon during and after the era of plantation slavery, also deserve to be investigated and evaluated. BRT project planning should not proceed without consideration and acknowledgement of the historic fabric of Gum Springs.

Pursuant to 36 CFR 800.3(b), given the traditional cultural attributes of Gum Springs as a historically black community, as well as its ongoing status as an underserved minority community, FTA should develop a clear plan, including public and Consulting Party

involvement, to coordinate its evaluation of Gum Springs historic properties pursuant to 36 CFR 800.4 with its compliance with applicable provisions of the National Environmental Policy Act.

I look forward to an opportunity to continue my review, as a Consulting Party, of the requested documentation, as stated above, and as additional documentation is developed pursuant to Section 106 of NHPA and its implementing regulations at 36 CFR 800. At this time, I urge FTA to give renewed and meaningful attention to the requirements of 36 CFR 800.2, "Participants in the Section 106 process"; 36 CFR 800.3,(b), "Coordination with other reviews"; and 36 CFR 800.4, "Identification of historic properties."

Sincerely,

Martha Claire Catlin

Historian

Alexandria Monthly Meeting of the Religious Society of Friends



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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www.dhr.virginia.gov

December 9, 2019

Mr. Daniel Koenig
Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

Re: Fairfax County Richmond Highway Bus Rapid Transit Program – Survey
Fairfax County
DHR File No. 2018-0722

Dear Mr. Koenig:

The Department of Historic Resources (DHR) received the *Addendum to the Historic Architectural Survey Technical Report for the Fairfax County Department of Transportation – November 2019* and the *Archaeological Assessment Technical Report* for our review and comment. The material met our QA/QC standards on November 14, 2019. The report was prepared by RK&K for Fairfax County Department of Transportation on behalf of the Federal Transit Administration (FTA). We understand that the proposed project includes the construction of new median lanes; nine associated stations; road widening; allotted space for bike facilities, trails and walkways; and will include both dedicated and mixed traffic lanes. DHR offers the following comments:

Architectural Resources:

- **Fair Haven** (DHR ID #029-6348) is recommended eligible for listing in the Virginia Landmarks Registry (VLR) and National Register of Historic Places (NRHP) under Criteria A and C. It falls within the defined resource subtypes described in the Multiple Property Documentation Form, *Historic Residential Suburbs in the United States, 1830-1960* (Ames and McClelland, 2004), Post-World War II and Early Freeway Suburbs, 1945-1960 (subtype IV). The report states that individual survey files were not created and that all extant homes from the period of significance (1942-1946) would be considered contributing. Furthermore, the report cites documentation which shows Fair Haven to be directly tied to the building of

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subdivisions to house the influx of government and wartime workers during World War II in the Washington D.C. metropolitan area. The Cape Cod type homes exhibit a high degree of uniformity and integrity. There is a high level of integrity with the landscaping and street grid as well. DHR concurs with the FTA's determination that Fair Haven is potentially eligible for VLR/NRHP listing.

- **Jefferson Manor** (DHR ID #029-6349) is recommended ineligible for VLR/NRHP listing because it is not an exceptional example of post-World war II suburban development and many of the homes have been extensively altered. Please provide additional information on what other properties Jefferson Manor is being compared to, in light of post-World War II housing in the region (i.e. rarity and integrity of the resource type locally) and what other Clarence Gosnell developments Jefferson Manor is being compared to, that illustrate it is ineligible for VLR/NRHP listing.
- **Richmond Highway/U.S Route 1** (DHR ID #029-5708) is recommended ineligible for VLR/NRHP listing, both individually and in the context of it being a linear historic district, due to an overall loss of integrity. DHR concurs with the FTA's determination that #029-5708 is not eligible for VLR/NRHP listing individually or as a transportation-related historic district.
- **Gum Springs** (DHR ID #029-6581) is an African American community, founded in 1833 by West Ford, located south of Alexandria, adjacent to Route 1. The survey found that the only architectural resources that remain from the earliest settlement is the landscape, in particular the north-south street grid that separated the four original West Ford grants to his children. A majority of the older houses were demolished in the 1960s, although there are examples of modified buildings of the earlier era. The survey recommends Gum Springs to be "overall" ineligible for VLR/NRHP listing due to the neighborhood not retaining enough historic fabric to convey its significance as a historic, long-standing African American community. The buildings in the neighborhood that do not meet the 50-year threshold were found to not meet Criteria Consideration G. The large-scale loss of physical integrity is documented in the survey results. The period of significance assessed for the report goes from the 1830s to the late 19th century, from the establishment of the African American community to its continuity as a whole. While the methodology applied makes it clear that the built environment is not eligible for VLR/NRHP listing; comments from consulting parties regarding Gum Springs need to be addressed by the FTA. DHR requests to be copied on all FTA and responses and any further correspondence.

In sum, DHR requests that consulting parties' comments be addressed and additional information be provided where specified above, before we can concur with the final identification of historic properties. Attached to this letter are the aforementioned comments from consulting parties for your reference.

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We look forward to continued consultation with the FTA and the other consulting parties as the project progresses. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for architectural issues) via email at adrienne.birge-wilson@dhr.virginia.gov or Roger Kirchen (for archaeology) at roger.kirchen@dhr.virginia.gov.

Sincerely,



Adrienne Birge-Wilson, Architectural Historian
Review and Compliance Division

cc: Vanessa Aguayo T., Fairfax County Department of Transportation
Douglas C. Miller, Fairfax County Department of Transportation
Fran Selden, Fairfax County
Laura Arseneau, Fairfax County

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County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

December 9, 2019

Daniel Koenig, Environmental Protection Specialist
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

**SUBJECT: Fairfax County Heritage Resources Comment for Section 106
Project on the Addendum to the Historic Architectural Survey
Technical Report dated November 2019 for the Richmond Highway
Bus Rapid Transit Program, Fairfax County, Virginia**

Mr. Koenig:

Thank you for providing the opportunity to review this report addendum. Please see the information provided below by Fairfax County Department of Planning and Development Heritage Resources staff in response to your request for review of the addendum Historic Architectural Survey Technical Report (HASTR) for the Section 106 Bus Rapid Transit (BRT) project along the Route 1 corridor dated November 2019. Additional comments provided by individual members of the Fairfax County Architectural Review Board based on the addendum are included as Attachment 1. The Fairfax County History Commission had no additional comments.

Prior to these comments, county Heritage Resources staff provided draft preliminary comments to the Federal Transit Administration via the Fairfax County Department of Transportation in December of 2018 and March of 2019, with the addition of comments from both the Architectural Review Board and the Fairfax County History Commission. Both letters were in response to the Section 106 project initiation and the proposed Area of Potential Effects (APE) letter sent out by the Federal Transit Authority (FTA) on October 4, 2018.

These comments are in addition to the comments provided on May 31, 2019 for the original HASTR dated April 2019.

HASTR Addendum Updates

In the HASTR Addendum, additional historic information was provided which includes context for two Post -World War II residential neighborhoods, Fair Haven and Jefferson Manor, as well as historic information about a segment of Richmond Highway/Route 1 and the community of Gum Springs. In the HASTR Addendum, the Fair Haven Subdivision was recommended eligible for the National Register of Historic Places, while the Jefferson Manor



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Subdivision, Richmond Highway and the Gum Springs community were recommended ineligible for the National Register of Historic Places. In addition, 12 of 135 previously identified properties have been demolished since the last survey.

Staff Recommendations

1. Additional Research Requested:

- Gum Springs: Staff continues to request that Gum Springs be evaluated as a Traditional Cultural Property using the National Register Bulletin #38, *Guidelines for Evaluating and Documenting Cultural Properties*, published by the National Park Service. This was not completed in the HASTR Addendum.

National Register Bulletin #38 states that a traditional cultural property (TCP) or the traditional cultural significance is “derived from the role the property plays in a community’s historically rooted beliefs, customs and practices.”¹ Properties identified as TCPs can be eligible for the National Register “because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continual cultural identity of the community.”² The bulletin further states that TCPs are “often hard to recognize...as a result such places may not necessarily come to light through the conduct of archaeological, historical or architectural surveys. The existence and significance of such locations often can be ascertained through interviews with knowledgeable users of the area or through other forms of ethnographic research.”³

It is noted in the HASTR Addendum that inquiries were made to obtain oral histories from residents of Gum Springs, but that no participants have been available to participate. Please provide additional information as to the methods used to obtain interviews as well as dates of inquiries. Oral histories are integral in evaluating a TCP.

Staff believes that Gum Springs is likely eligible for the National Register as a TCP under Criterion A: Association with significant events as it demonstrates the significance of the community in the evolution of an African American

¹ National Park Service, “National Register Bulletin #38, Guidelines for Evaluating and Documenting Cultural Properties,” 1.

² Ibid.

³ Ibid.

Community. The addendum report supports this as evidenced through the following findings, in the “Historic Context” section:

- A free person of color founded the community ⁴
- The community provided postwar suburban housing for African American families, who could not live on Fort Belvoir ⁵
- Black neighborhoods did not receive basic public services⁶
- Financing from banks was not readily available to improve dwellings because of discriminatory practices and without infrastructure⁷
- Existence of community buildings, churches, parks, schools, Pride of Fairfax Lodge⁸
- Demolition of 1960s housing stock for multi-family dwellings⁹

Staff agrees that Gum Springs is not eligible based on existing architectural resources. However, a comprehensive oral history of the community, which is the main research method in a TCP, was not completed in the HASTR Addendum. Staff believes that the oral history research would provide additional information. It is noted in the HASTR Addendum that inquiries were made to obtain oral histories from residents of Gum Springs, but that no participants have been available to participate. Please provide additional information as to the methods used to obtain interviews as well as dates of inquiries.

Various social factors, due solely to the presence of the black community as evidenced above, have solidified and defined Gum Springs throughout its almost 200-year existence. Gum Springs exhibits the evolution of a free black community and demonstrates how societal impacts led to the development of this neighborhood as it exists today, and this is likely representative of a TCP.

One of the comments in the HASTR Addendum is that individual elements of Gum Springs may have potential eligibility, but these are located outside of the APE.¹⁰ Staff acknowledges that many of the resources related to Gum Springs

⁴ FCDOT, “Richmond Highway Bust Rapid Transit Project, Addendum to the Historic Architectural Survey Technical Report,” November 6, 2019, 32.

⁵ Ibid. 36.

⁶ Ibid.

⁷ Ibid.

⁸ Ibid., 36-42.

⁹ Ibid. 48.

¹⁰ Ibid. 58.

along Route 1 are no longer present; however, after further research into the community and the delineation of the APE in the HASTR Addendum, staff believes two properties are an integral part of the community and further research is warranted. Spring Garden Apartments and the St. John the Baptist Church (formerly Woodlawn Methodist Church), are shown within the APE in the HASTR Addendum.¹¹ The HASTR Addendum does not discuss the significance of either of these two properties to Gum Springs. Spring Gardens Apartments were constructed as part of the effort to create housing for families after single family housing was demolished in the 1960s¹² and St. John Baptist Church is located on the county's Inventory of Historic Sites. In previous county staff comments, St. John Baptist Church is listed as proximate to the APE; however, with additional information provided by the HASTR Addendum, comments have been modified to list this county Inventory of Historic Sites property within the APE (Attachment 2, page 12).

Please see the Comprehensive Plan Section of Attachment 2 (Pages 16-19) for more information on the history of the Gum Springs Community.

- County Windshield Survey Sites: Staff continues to recommend that further analysis of National Register eligibility and determination of effects be completed for all windshield survey sites that were identified within the APE. Staff has provided a list of properties from the county windshield survey conducted in 2015-2016 that need further research in Table 4 (Pages 14-16).
- Post -WWII Suburbs: Staff appreciates the additional research completed to determine the eligibility of both the Fair Haven and Jefferson Manor Subdivisions. Staff supports the conclusion of eligibility for the Fair Haven Subdivision.

Staff further requests additional information of eligibility for Jefferson Manor subdivision. The addendum report states that the district is not eligible because:

- It is not associated with the wartime housing effort
- It is not associated with post- World War II suburban development,
- It is not a unique example of properties developed by Clarence Gosnell

¹¹ Ibid. 59,60.

¹² Chase, John Terry. *Gum Springs: The Triumph of a Black Community*, (Heritage Resources Program of the Fairfax County Office of Comprehensive Planning, 1990), 81.

- It is not a unique example of duplex development in the areas surrounding Washington DC.
- A number of the homes have been significantly altered.¹³

Staff believes that Jefferson Manor subdivision shares many characteristics of the National Register recommended eligible Fair Haven, because of their proximity. While the Jefferson Manor Subdivision was constructed later than Fair Haven and is a different type of housing, both promoted the use of Federal Housing Administration loans and are located close to Washington D.C. Furthermore, staff contends that the “low-cost” technology, focus on prefabrication, and the development efforts that allowed the houses to be quickly constructed, adds to the significance of the development. These methods demonstrate the need for housing after the post-World War II and the need for jobs in the area.¹⁴ Due to these findings, staff believes that the Jefferson Manor Subdivision should be considered eligible for the National Register under Criterion A.

Additional staff comments:

1. Area of Potential Effects: Staff reiterates the following request for information contained in the previous comment letter dated May 31, 2019.

Staff acknowledges that previous reviews of the Route 1 Corridor for effects on heritage resources have been conducted with previous proposals and projects, including the Route 1 Widening project and the Embark study. The Fairfax County Comprehensive Plan recommends additional intensity of development with varying heights around the proposed BRT stations. Staff requests that the consultant place the proposed locations of the BRT stations on the Architectural Survey Results Maps and Historic Property Maps provided in the original HASTR. Once the height of the BRT stations is known, and the National Register eligibility determinations has been completed, a viewshed analysis could assist both staff and consulting parties in analyzing any impacts on existing heritage resources.

Additional information should be provided for the APE delineations, including reasons for varying width along the Route 1 Corridor, location of associated BRT construction activities (any ground disturbance) and construction staging areas. This will assist staff and other consulting parties in their analysis of the impact on existing heritage resources.

¹³ FCDOT, “Richmond Highway Bust Rapid Transit Project, Addendum to the Historic Architectural Survey Technical Report,” November 6, 2019, 15.

¹⁴ Ibid.

2. National Register of Historic Places Sites: Any site listed on or eligible for the National Register of Historic Places should be preserved and avoided. Of note, Woodlawn Plantation is identified as a National Historic Landmark, is nationally recognized and as such should receive the highest level of protection. Any physical or visual impact on listed or eligible sites should be minimized. (Attachment 2, Page 10).
3. National Register Eligibility: Heritage Resources staff agrees with the two recommendations of National Register potential eligibility determined in the April 23, 2019 FTA/FCDOT Survey for the Penn Daw Fire Station and St. Louis Walsh Hall Catholic Church.

Staff also agrees with the following recommendations in the HASTR Addendum dated November 6, 2019:

- that the Fair Haven Subdivision is eligible for the National Register of Historic Places.
 - that the Route 1 Corridor is not eligible for the National Register of Historic Places.
4. Architectural Review Board review: According to section 7-200 of the Zoning Ordinance, the Fairfax County Architectural Review Board is required to be consulted for any physical or visual impact from the proposed project in historic overlay districts.
 5. Fairfax County History Commission review: The Fairfax County History Commission should be consulted for any physical or visual impact from the proposed project in or adjacent to properties listed on the Inventory of Historic Sites.
 6. Archaeological impacts: The Archeological Collections Branch of the Fairfax County Park Authority should be consulted for the ground disturbance of any property within or proximate to the APE.
 7. Architectural Survey: Staff reiterates the request for a copy of the research report from the Architectural Survey completed by Rummel, Klepper & Kahl on October 29, 2018 and November 27, 2018 for county records. As of the time of this letter, it has not yet been received.

Mr. Daniel Koenig
December 9, 2019
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Thank you for providing us with the opportunity to comment. If you have any questions, please feel free to contact either Laura Arseneau at 703-324-1209, laura.arseneau@fairfaxcounty.gov or Leanna O'Donnell at 703-324-1380 leanna.o'donnell@fairfaxcounty.gov.

Sincerely,



Barbara Byron, Director
Fairfax County Department of Planning and Development

Cc:

Tom Biesiadny, Director, Fairfax County Dept. of Transportation
Vanessa Aguayo, Fairfax County Dept. of Transportation
Douglas Miller, Fairfax County. Dept. of Transportation
Leanna H. O'Donnell, Acting Director, PD, DP
Elizabeth Crowell, Archaeologist, Fairfax County Park Authority
Adrienne Birge-Wilson, Virginia Department of Historic Resources

Attachments:

1. Fairfax County Architectural Review Board Comments
2. Staff Identified Heritage Resources within and proximate to the APE (from May 31, 2019 comment letter with one change of St. John Baptist Church being located on the Inventory of Historic Sites from "proximate to" to "within" the APE.)

ATTACHMENT 1

Fairfax County Architectural Review Board Comments

Historic Architectural Survey, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722

Consolidated by Laura Arseneau, Architectural Review Board Staff, Dept. of Planning and Zoning
December 9, 2019

Jason Sutphin
Architectural Review Board (ARB) Member
November 27, 2019

Please find my observations below. I would defer to the ARB members with more familiarity with that area regarding site specific recommendations.

1. There is no reference to the Fairfax County Inventory of Historic Sites. Was that existing Inventory used in the identification of sites? Why is it not cited? Ensure that all relevant sites listed on the Inventory are acknowledged.
2. There is no direct reference to preservation recommendations from the Comprehensive Plan, particularly: the Heritage Resources Policy Plan sections; Richmond Highway Corridor Area guiding principles; Mount Vernon Planning District language; Lower Potomac Planning District language; and, recommendations from multiple Special Planning Areas along Rte 1. Have objectives and recommendations been evaluated and met? Please account for the policy direction from the Plan.
3. The APE does not necessarily take into account view sheds or impacts to portions of properties split by the red lines of the APE boundaries. Likewise, the APE should be overlaid on a GIS parcels layers to determine which specific properties are either inside of or adjacent to the APE. Some maps in the document show this, but they are focused in and are not provided for the extent of the APE's length. The APE does not appear to be fixed to the centerline of the roadway, at least as depicted, thus the established dimension and placement are not clear. A better explanation and depiction of the establishment of the APE are warranted.

Mr. Daniel Koenig
December 9, 2019
Page 9

Samantha Huang
ARB Member
December 2, 2019

I have reviewed the linked document and realized that the submitted report is complied with the additional information in response to DHR review comments dated 2019.06.03.

I found the report does cover most of the review comments, if not all, and provide adequate survey and research information in general.

However, after reading through the report I found myself in doubt with regards to the conclusions established for U.S. Route 1 and Gum Springs - recommended not eligible for list in NRHP. I am open to other's comments on this.

John A. Burns
ARB Chair
December 2, 2019

For the most part, the interesting historic buildings associated with Route 1 as a transportation corridor are gone (the motels, motor courts, various Mount Vernon replicas, Musso Gasohol, Dixie Pig, the original red-and-white McDonalds, the Beacon Hill and Hybla Valley Airports, etc). The stuff that is remaining is pretty beat up, isolated, and not potentially eligible. And, aside from Woodlawn and Pohick Church, there's not much older than 20th century. It was a vernacular/commercial architecture dream, but is no more.

There are a couple that caught my eye, however. The C&M Machine Shop (# 8155) is an authentic relic of an era when such a shop could fix things, not replace parts (I have used them when I needed something welded; it was a trip back in time). I wish there was more on Gum Springs, but most of the remaining stuff is outside the APE. The Kimchi House and Forest Laundromat at Forest Drive are remnants of a motor court and motel, respectively, but both have lost their guest rooms and are heavily altered. There is a vintage soft-serve drive-in and a small strip shopping center across the highway from the Kimchi House, but collectively, they hardly comprise a potential historic district (too little integrity). Further south, there are the Mount Vernon replicas Wells Fargo Bank at Cooper Road and the old amusement park building at Dogue Creek.

ATTACHMENT 2

Staff Identified Heritage Resources within and proximate to the APE

National Register of Historic Places Listed and Eligible Sites within the APE

Below is a table that outlines the National Register of Historic Places (NR) listed and eligible sites and the dates they were designated:

Table 1- National Register Sites

	Name of Site	Address	Listed on NR	Eligible for NR
1.	Woodlawn Cultural Landscape Historic District	Various	9/2018	
2.	Original Mount Vernon High School	8333 Richmond Hwy.	5/2018	
3.	Camp A.A. Humphreys Pump Station and Filter Building	9155 Richmond Hwy.		Yes
4.	Fort Belvoir Military Railroad Historic District Corridor	Various		Yes
5.	Fort Belvoir Military Railroad Track Bed	Various		Yes

As noted in the Fairfax County Comprehensive Plan, 2017 Edition Area IV Mount Vernon Planning District, as Amended through 10-16-2018, Overview on page 16:

“The Virginia Landmarks Register and the National Register of Historic Places also officially recognize properties meeting specific criteria. Like the county Inventory, benefits of designation include public recognition and enhanced support for preservation. In addition, projects that are funded or sanctioned by federal government agencies may require review to determine if they will have any effect on properties listed in or eligible for listing in the National Register for Historic Places. Alternatives must

be explored to avoid or reduce harm to the historic properties.”

These sites listed above have nationally recognized significance and as such should receive the highest level of mitigation and protection. Any physical or visual impact on these areas should be minimized.

County Historic Overlay Districts

There is one county designated Historic Overlay District (HOD) that is directly within the proposed APE. This historic district, Woodlawn HOD, is located at 9000 Richmond Highway. The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Mount Vernon Planning District, as Amended through 10-16-2018, Overview, page 16 states:

“The county’s Historic Overlay District is a zoning tool used to regulate proposed new construction and changes to existing structures in areas containing heritage resources to ensure compatibility with the resources. Site design, facades, demolition, and building materials must be reviewed and approved by the county’s Architectural Review Board.”

One other district, Huntley HOD (6918 Harrison Road) is not directly within the APE but there may be visual impacts from the proposed developments and BRT stations. Additional viewshed and impact analysis was completed for this HOD during the Embark study and recommendations for minimization of visual impact are included in the Comprehensive Plan.

As county designated and protected historic areas, every effort should be made to avoid any physical or viewshed impact. Woodlawn HOD especially will be affected, as the Route 1 corridor bisects the historic overlay district. Staff requests that any physical or visual impact to these areas, especially to the viewshed that is the basis for the HOD, be brought to the Architectural Review Board (ARB) for consultation and comment.

County Inventory of Historic Sites

The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Mount Vernon Planning District, as Amended through 10-16-2018, Overview, page 16, describes the Inventory of Historic Sites:

“The county Inventory of Historic Sites includes properties which meet certain eligibility criteria and are officially designated by the county’s History Commission. In addition to historic, architectural or archaeological significance, property that serves as a focus of community identity and pride may also be recognized. The benefits of designation

include public recognition of the structure's significance and enhanced support for preservation. Owners of properties included in the Inventory may meet with the county's Architectural Review Board on a voluntary basis to review proposed changes to their properties. Project review and approval by the county's Architectural Review Board may be required in accordance with the guidance provided by the Policy Plan under Land Use Appendix 9 Residential Development Criteria 8 Heritage Resources.”

The following list highlights the properties listed on the Fairfax County Inventory of Historic Sites that staff identified are within the defined APE:

Table 2- Inventory of Historic Sites within APE

	Name of Site	Location
1.	Fort Lyon Earthworks*	South side of James Drive and N. Kings Hwy.
2.	Mount Eagle*	Located on the west side of Richmond Hwy and Mount Eagle Road intersection
3.	Spring Bank*	*located behind existing Walmart at 6303 Richmond Hwy.
4.	Original Mount Vernon High School, V, N	8333 Richmond Hwy.
5.	Woodlawn Cultural Landscape HD, V, N	Various
6.	Ft. Belvoir Military Railroad Historic Corridor	Various
7.	Camp Humphreys Pump Station and Filter Building	9155 Richmond Hwy.
8.	Otis T. Mason House	8907 Richmond Hwy.
9.	Woodlawn Methodist Church (part of Gum Springs Community)^	7730 Fordson Road

**denotes site is demolished, but still retains archaeological potential*

V- listed on Virginia Landmarks Register

N- listed on the National Register of Historic Places

^ updated from May 31, 2019 letter

For the sites shown above listed on the Inventory of Historic Sites within the APE, staff recommends that avoidance be the primary goal. For sites that are already denoted as

demolished, staff recommends that the Archaeological Collections Branch of the Fairfax County Park Authority be consulted for further analysis.

Staff identified the additional sites below on the Fairfax County Inventory of Historic Sites that are proximate to the APE:

Table 3- Inventory of Historic Sites proximate to APE

	Name of Site	Location
1.	Fort Willard Circle	6625 Fort Willard Circle
2.	George Washington Memorial Parkway viewshed V,N	Various
3.	Hollin Hills Neighborhood, V, N	Various
4.	Bethlehem Baptist Church (part of Gum Springs Community)	7836 Fordson Road
5.	Peake Family Cemetery	Martin Luther King Jr. Park off of Fordson Road
6.	Accotink United Methodist Church	9043 Backlick Road
7.	Woodlawn Plantation; V,N	9000 Richmond Hwy.
8.	Pope-Leighey House, V, N	9000 Richmond Hwy.
9.	Grand View	9000 Richmond Hwy.
10.	Woodlawn Friends Meeting House, V, N	8990 Richmond Hwy.
11.	Woodlawn Baptist Church*	9001 Richmond Hwy.
12.	George Washington's Grist Mill, V, N	5514 Mount Vernon Memorial Hwy.

**denotes site is demolished, but still retains archaeological potential*

V- listed on Virginia Landmarks Register

N- listed on the National Register of Historic Places

Although these sites listed above are not directly within the determined APE boundaries, because of their proximity to the APE, it is foreseeable that there may be potential visual effect from the proposed BRT stations and associated developments.

Staff further recommends that the Fairfax County History Commission be consulted for any potential impact on sites listed on the Inventory of Historic Sites.

County Surveyed Sites

Between 2015 and 2016, Department of Planning and Zoning staff completed an architectural windshield survey of potential significant historic structures and properties along and near to the Route 1 Corridor. They identified 28 sites for further evaluation (listed in the table below).

The Federal Transit Administration identified 117 new sites to examine further in their Proposed APE assessment and letter dated October 4, 2018. Of those 117 sites, four were included in the county windshield survey of Route 1 as demonstrated in the table above.

Nine of the County identified windshield survey sites had already been determined not eligible by the Virginia Department of Historic Resources (VDHR) for the National Register. Requests additional eligibility justification as noted in the Table.

For the remaining items that do not have an eligibility determination from VDHR and are still standing, further research is needed. Staff recommends that further research of eligibility be completed to determine the significance, if any, of these structures.

Table 4- Fairfax County Windshield Survey Sites

Property Addresses Identified in Fairfax County Windshield Survey	Identified by FTA in 10/4/2018 letter for further research	Identified by Architectural Survey by FTA- 4/23/2019	Determined not NR eligible by VDHR	County HR Staff Recommendation
1. 2908 Farmington Drive- Dwelling				No visual impact
2. 2904 Farmington Drive- Dwelling				No visual impact
3. 5803 North Kings Hwy- Huntington Metro Police Station		Outside APE		More research- architectural significance and potential viewshed impact
4. 5825 Foley Street- Dwelling				No visual impact
5. 2060 Huntington Avenue- Dwelling				No visual impact
6. 2056 Huntington Avenue- Dwelling				No visual impact
7. 2816 Franklin Street- Dwelling	X	Not Eligible		More research*
8. 6416 Richmond Highway- Penn Daw	X	Eligible for NR		Agree

Property Addresses Identified in Fairfax County Windshield Survey	Identified by FTA in 10/4/2018 letter for further research	Identified by Architectural Survey by FTA-4/23/2019	Determined not NR eligible by VDHR	County HR Staff Recommendation
Fire Station (A & A rentals)				
9. 3000 Franklin Street- Dwelling				No visual impact
10. 2909 Franklin Street- Dwelling				No visual impact
11. 6701 Richmond Hwy- Cleaners		Not Eligible	X	More research*
12. 6801 Richmond Hwy- Cash Title Loans	X	Not Eligible		More research*
13. 2817 Schooley Drive- Dwelling		Not Eligible		More research*
14. 6821 Richmond Hwy- Dwelling/ Chamber of Commerce		Not Eligible	X	More research*
15. 6831 Richmond Hwy- Dwelling		Not Eligible	X	More research*
16. 6835 Richmond Hwy- Dwelling		Not Eligible	X	More research*
17. 6969 Richmond Hwy- Office building const. 1974	X	Not Eligible		More research*
18. 2901 Popkins Lane- Walsh Hall Catholic Church		Eligible	X	Agree with consultant eligibility determination
19. 7809 Fordson Road- Pride of Fairfax		N/A		More research- Gum Springs
20. 8257 Richmond Hwy- Red Carpet Inn- const. 1945		No recc.	X	More research*
21. 8359 Richmond Hwy- Dwelling		No recc.	X	More research*

Property Addresses Identified in Fairfax County Windshield Survey	Identified by FTA in 10/4/2018 letter for further research	Identified by Architectural Survey by FTA- 4/23/2019	Determined not NR eligible by VDHR	County HR Staff Recommendation
22. 8369 Richmond Hwy- Dwelling (Pretty Pets Grooming)		No recc.	X	More research*
23. 8256 Richmond Hwy- NC Style BBQ const. 1959		No recc.		More research*
24. 8592 Richmond Hwy- Mt. Vernon Knights of Columbus, const. 1970		No recc.		More research*
25. 8505 Highland Lane- Woodlawn Elementary School		No recc.		More research*
26. 8609 Richmond Hwy- Dwelling		No recc.	X	More research*
27. 8653 Richmond Hwy- First AME Church		No recc.		More research*
28. Woodlawn UMC cemetery		Eligible		Already in NR Woodlawn Cultural Landscape Historic District.

*These resources could be evaluated for inclusion to the National Register in a broader context, including how they relate to the increased use of Route 1 as a major transportation corridor and the increased development associated with the corridor during the 20th century.

County Comprehensive Plan Heritage Resources References- Gum Springs and Hollin Hills

Additionally, the Fairfax County Comprehensive Plan recognizes the communities of Gum Springs and Hollin Hills as important county heritage resources. Staff has identified these here as they could be impacted by the proposed project.

In the Comprehensive Plan, Area IV, Mount Vernon Planning District, MV5-Fort Hunt Community Planning Sector, Heritage Resources on page 90, the Comprehensive Plan singles

out the historic free-black community of Gum Springs as an important county resource, and recommends The Pride of Fairfax, a community landmark located in Gum Springs, be evaluated for potential inclusion in the Inventory of Historic Sites.

The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Mount Vernon Planning District, amended through 10-16-2018, MV6-Fort Hunt Community Planning Sector, beginning on page 90 states:

“Heritage Resources

The early and mid-20th century and more dispersed neighborhoods and open spaces in this sector may contain significant heritage resources. In particular is Gum Springs, 19th century Free Black community. The Pride of Fairfax, a Masonic Lodge and Community Landmark for Gum Springs, is located at Tax Map Parcel 102-1 ((1)) 98. It should be evaluated for potential inclusion in the Inventory of Historic Sites. Additional survey work should be undertaken to locate and preserve significant heritage resources. Additionally, preservation of the Hollin Hills subdivision, listed in *The National Register of Historic Places*, is encouraged.

Any development or ground disturbance in this sector, both on private and public land, should be preceded by heritage resource studies, and alternatives should be explored for the avoidance, preservation or recovery of significant heritage resources that are found. In those areas where significant heritage resources have been recorded, an effort should be made to preserve them. If preservation is not feasible, then, in accordance with countywide objectives and policies as cited in the Heritage Resources section of the Policy Plan, the threatened resource should be thoroughly recorded and in the case of archaeological resources, the artifacts recovered.”

The Comprehensive Plan also references the community of Gum Springs in other sections of the Plan. The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Richmond Highway Corridor Area, amended through 5-1-2018, Community Business Centers, beginning on page 118, states:

HYBLA VALLEY/GUM SPRINGS COMMUNITY BUSINESS CENTER

“The Hybla Valley and Gum Springs communities have rich heritages that includes both existing historical sites, historic or cultural remnants of the past, and major ecological resources. Of special significance, Gum Springs was founded in the 19th century as a Free Black community where noteworthy sites and buildings include the Pride of Fairfax Masonic Lodge, Bethlehem Baptist Church and a former baptismal site. Other memorable uses dating from the early twentieth century through the 1950s

were located in Hybla Valley, including the Mount Vernon Drive-in Theatre and the George Washington Air Junction, an airport used for navel flight training during World War II. Additionally, there are remnants of early roadway alignments still in use today such as Fordson Road, which follows the original path of Route 1 and, prior to that, the alignment of the former Potomac Path.”

...

Land Unit E: p. 140

Base plan:

Redevelopment should be done in accordance with the Gum Springs Redevelopment Plan, adopted by the Board of Supervisors on April 16, 1990. The heritage resources within the historic community of Gum Springs should be protected in all development proposals.

...

The Gum Springs Redevelopment Plan area is planned for residential development at 5-8 dwelling units per acre and for office and commercial uses along the Richmond Highway frontage. Residential development at 16-20 dwelling units per acre and a reconfiguration of the strip commercial areas into areas of office and/or retail uses may be appropriate, if the following land use and transportation conditions are met:

...

New development is sensitive to the existing institutional and residential uses, which have long-standing ties to the Gum Springs Community, and effective measures should be taken to protect these institutional uses from any adverse impacts generated by adjacent higher intensity residential, office or retail development through a combination of architectural and landscaping techniques;

For the sites recognized in the Comprehensive Plan as historic and near to the proposed APE, staff recommends that avoidance be the primary goal. However, if that is not feasible, staff recommends that the sites be documented, through photographic and/or measured drawings, and surveyed for their architectural, landscape, archaeological values if planned to be demolished. For sites that are already denoted as demolished, staff recommends that the Archaeological Collections Branch of the Fairfax County Park Authority be consulted for further analysis.

January 10, 2020
Via email Transmission

Vanessa T. Aguayo and Douglas C. Miller
Fairfax County Department of Transportation
Fairfax, Virginia

Re: Richmond Highway Bus Rapid Transit Project
Fairfax County, Virginia

Dear Ms. Aguayo and Mr. Miller:

I appreciate the opportunity to continue my review, supplementing my comments on the FTA's recommendations and supporting documentation regarding properties within the Richmond Highway Bus Rapid Transit (BRT) project's area of potential effect, and their eligibility for listing on the National Register of Historic Places (National Register). In further review of the documentation, I have no changes to make to my comments of December 2, 2019 and ask that they be given meaningful consideration. Please also consider the following supplemental comments, which respond principally to the "Richmond Highway Bus Rapid Transit Project ADDENDUM TO THE HISTORIC ARCHITECTURAL SURVEY TECHNICAL REPORT for Fairfax County Department of Transportation" (Report).

First, I would like to reiterate my previously stated concern regarding:

... the recommendations, attributed to FTA, that any and all potentially historic properties, taken individually or as a group, in the Gum Springs portion of the BRT area of potential effect are deemed ineligible for listing on the National Register. I particularly object to your ruling out, at this early stage in the Section 106 consultation process, the reasonable possibility that National Register eligibility can be fully supported through an appropriate level of investigation of the history of Gum Springs. Any such determination should take into consideration factors in the community's potential eligibility such as the long-term survival of cultural traditions, established during its beginnings as a free African American community nearly two centuries ago. In my initial review of your historic property identification documentation, I found no evidence that such an evaluation was done before you reached conclusions constituting FTA's formal recommendations to the Virginia SHPO regarding National Register eligibility. [Catlin letter, December 2, 2019]

Beyond this fundamental issue, but consistent with my overarching concern that the documentation appears too preliminary to be used as a basis for National Register eligibility determinations, I would note that examples of poor or inadequate research are numerous – some minor, but not all. Any such instances are of concern, and I believe could have been reduced, or averted, through consultation with stakeholders and citizens with both first-hand and scholarly knowledge of the history of the Route One corridor. In an example I believe should be highlighted, the Report asserts:

"In the first half of the nineteenth century, Fairfax County constructed several roads to improve transportation, including the Alexandria, Mount Vernon, and Accotink Turnpike." (Report, pp. 21-22)

This statement appears, erroneously, to attribute to Fairfax County the construction of the Alexandria, Mount Vernon, and Accotink Turnpike. The turnpike was in fact constructed under the auspices of a company incorporated by Woodlawn's Quakers and other landowners and entrepreneurs whom the Friends enlisted from the Mount Vernon area and the city of Alexandria to join them in investing in the area's transportation infrastructure. [CHAP. 172.-An ACT incorporating the Alexandria, Mount Vernon and Accotink turnpike company. Passed March 11, 1856.]

The original Accotink Turnpike forms a significant part of the current Route One alignment between Accotink and Gum Springs, and therefore, constitutes an important portion of the proposed BRT project's geographic scope, which the Report's purpose is to evaluate in historical terms. The road was a critical component of the Woodlawn Quakers' strategy to demonstrate that family farming and gardening by non-slaveholding white and free black farmers could establish a stronger and more equitable economy than that of the failing plantations of local slaveholders. The initiative's economic impact was enhanced by its symbolism as a part of the transformation of lands once owned by George Washington, where, in accordance with his last will and testament, the people he had held in bondage at Mount Vernon were emancipated. Travelers along the Turnpike would have seen the farmhouses, crops, and livestock of the multiple small family farms, carved from the 2,000-acre Woodlawn Tract, displayed on either side along a four-mile stretch of the road. Of the African American population in evidence, including owners of Woodlawn Tract farms, many would have been the descendants of Mount Vernon's freed people.

Such errors of fact in the Report may be perceived by its authors to be minor; however, they have the effect of erasing history that is of some consequence to stakeholders today. Among those stakeholders are residents and cultural entities whose sense of place is imbued with the legacies of slavery, the Civil War, and commitment to community action in furtherance of justice. Authors of the Report should reasonably have expected that these stakeholders might include, among others, the Alexandria Quaker Meeting, Gum Springs Historical Society, and the National Trust for Historic Preservation – in particular, in its ongoing development of the Woodlawn/Pope-Leighey historic site as a Fairfax County Cultural Center in partnership with Arcadia Farm. FTA should re-evaluate certain of the properties, particularly those in Gum Springs, that embody these historical themes, which the Report so summarily dismisses or ignores.

Other stakeholders in the area potentially affected by the BRT project may have similar concerns about the Report's inadequate treatment of such extant properties as the Penn-Daw Fire House, the St. Louis Chapel, and possibly others with which I am less familiar. However, despite the passage of time since the meeting of September 4, 2019, after which additional outreach could have been undertaken by FTA and its representatives, these additional stakeholders do not appear to have yet been included in Section 106 consultation.

I reiterate my concern, as previously expressed:

Based on the distribution lists for your November 7, 2019, letter and email transmittal to the Virginia SHPO, it appears that my concern with respect to your agency's responsibility for outreach to additional potential stakeholders in the Section 106 process has not, at this time, been addressed. In an email message to you dated October 9, 2019, I reiterated this concern, which I

had initially expressed at the BRT Section 106 consultation meeting of September 4, 2019. My message to you stated, in part:

Given the early stage of the BRT Section 106 review, when historic properties are still in the process of being identified, outreach to those with knowledge of local history and resources is important. Based on the invitees to the meeting of September 4, only three areas within the defined area of potential effect were represented by nongovernmental stakeholders: Woodlawn Meetinghouse, Woodlawn/Pope-Leighey (both included in the Woodlawn Cultural Landscape Historic District), and Gum Springs. Although I am grateful to be included as a Consulting Party, stakeholders and interested parties from all areas of the Route One corridor should also be provided an opportunity to be represented. [Catlin letter, December 2, 2019]

In light of the concerns I have expressed, and also in consideration of the continuing confusion in public perceptions between FTA's BRT federal undertaking and that of Federal Highway Administration and Virginia Department of Transportation for the Route One widening project – upon which implementation of the BRT project clearly depends – I believe it is important also to reiterate:

At this time, I urge FTA to give renewed and meaningful attention to the requirements of 36 CFR 800.2, "Participants in the Section 106 process"; 36 CFR 800.3(b), "Coordination with other reviews"; and 36 CFR 800.4, "Identification of historic properties." [Catlin letter, December 2, 2019]

I am grateful for the opportunity to comment on the referenced documentation and look forward to continued involvement in the Section 106 consultation for the BRT project.

Sincerely,
Martha Claire Catlin
Historian
Alexandria Monthly Meeting of the Religious Society of Friends



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

April 7, 2020
Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Addendum to the Historic Architectural Survey and Phase I Archaeological Survey, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722

Dear Ms. Birge-Wilson:

The Fairfax County Department of Transportation (FCDOT) is supporting the Federal Transit Administration (FTA) with Section 106 consultation for the Richmond Highway Bus Rapid Transit Project. FCDOT, in coordination with FTA, is proposing to implement bus rapid transit (BRT) service along Richmond Highway / U.S. Route 1 and North Kings Highway / State Route 241 from U.S. Army Garrison Fort Belvoir to the Huntington Metrorail Station. The project includes the construction of new BRT-dedicated median lanes; nine BRT stations; roadway widening; streetscape improvements; and accommodations for walkways, trails, and bicycle facilities. The project would operate in both dedicated and mixed traffic lanes within the project limits.

We have made available the digital version of the Addendum to the Historic Architectural Survey Technical Report prepared for the project, as well as the Virginia Cultural Resource Information System (V-CRIS) forms. The Phase I Archaeological Survey Archaeological Technical Report prepared for the project has also been made available. At this time, the FCDOT and FTA seek concurrence from your office on the identification of historic properties for the project.

The current addendum report was prepared to provide additional information related to Jefferson Manor (DHR No. 029-6349) and to incorporate recent design changes occurring at several intersections necessitating an updated historic architectural area of potential effects (APE). Based on the latest proposed project design the historic architectural APE was expanded at the following intersections along the US 1 / Richmond Highway corridor: Boswell Avenue, Popkins Lane, Collard Street, and Fairview Drive. The expanded historic architectural APE encompasses all parcels within and adjacent to the proposed maximum limits of disturbance (LOD). This project documents survey and evaluation to identify historic properties, i.e., those listed or considered eligible for listing in the National Register of Historic Places (NRHP), that could potentially be affected by the undertaking. The survey was conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665, as amended), as implemented by the procedures for the

Ms. Birge-Wilson

April 7, 2020

Page 2

Protection of Historic Properties (36 CFR Part 800, as revised), and the *DHR Guidelines for Conducting Historic Resources Survey in Virginia* (DHR 2017). All work was completed or supervised by staff that meet or exceed the respective professional qualifications as specified in 36 CFR Part 61.

The Phase I archaeological survey included shovel testing of nine areas that were identified as part of the Archaeological Assessment. Eighty-three shovel test pits (STPs) were excavated within the nine survey areas. Testing revealed the majority of the survey areas contained disturbed soils related to residential, commercial, and roadway development along Richmond Highway despite being identified in the assessment report as potentially containing intact soils.

Artifacts dating from the nineteenth to twentieth century were recovered from Survey Areas G and H. Seven historic artifacts were recovered from a disturbed context in one STP in Area G. Radial testing did not recover any additional historic artifacts. The artifacts were not recorded as an archaeological site given their disturbed context and association with modern materials. No additional archaeological investigations are recommended within Area G. Two historic artifacts were recovered from disturbed context in Area H and radial testing did not produce additional artifacts. A metal detector survey completed in Survey Area H to identify cultural materials potentially related to the Civil War Fort Lyon recovered only twentieth-century materials. No cultural materials related to the Civil War-period Fort Lyon were recovered and no further work is recommended in Area H. No precontact or historic artifacts were recovered from the seven remaining survey areas. The Phase I archaeological survey for the Richmond Highway BRT Project did not identify any new archaeological sites and no further work is recommended within the nine survey areas in the Field Review Area.

If you have any questions or concerns, please contact Ms. Shauna Haas at 215-656-7053, or via email at Shauna.Haas@dot.gov.

Sincerely,



Vanessa Aguayo T., PE

Project Manager

Capital Projects & Traffic Engineering Div.

Fairfax County Department of Transportation



Douglas C. Miller

Environmental Specialist

Capital Projects & Traffic Engineering Div.

Fairfax County Department of Transportation

Ms. Birge-Wilson

April 7, 2020

Page 3

cc: Shauna Haas, Federal Transit Administration

Daniel Koenig, Federal Transit Administration

Ross Bradford, National Trust for Historic Preservation

Anissa Brown, Virginia Department of Transportation

Barbara Byron, Fairfax County Government, Department of Planning and Development

Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends

Ronald Chase, Gum Springs Historical Society

Elizabeth Crowell, Fairfax County Park Authority

Christopher Landgraf, Department of the Army (Fort Belvoir)

Erin Thompson, Delaware Nation



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

May 8, 2020

Ms. Shauna Haas
Environmental Protection Specialist
U.S. Department of Transportation
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

Re: Fairfax County Richmond Highway Bus Rapid Transit Program – Survey
Fairfax County
DHR File No. 2018-0722

Dear Ms. Haas:

The Department of Historic Resources (DHR) received the *Richmond Highway Bus Rapid Transit Project, Addendum to the Historic Architectural Survey Technical Report for the Fairfax County Department of Transportation, April 2020* and the *Richmond Highway Bus Rapid Transit Project, Phase I Archaeological Survey Technical Report, April 2020* for our review and comment. The reports were prepared by Rummel, Klepper, and Kahl, LLP (RK&K) for Fairfax County Department of Transportation (FCDOT) on behalf of the Federal Transit Administration (FTA). The proposed project includes the construction of new median lanes; nine associated stations; road widening; allotted space for bike facilities, trails and walkways; and will include both dedicated and mixed traffic lanes. DHR offers the following comments:

Archaeological:

The archaeological study of nine survey areas documented widespread disturbance from residential, commercial, and roadway development along Richmond Highway. Artifacts were recovered from two areas; however, it was determined that these artifacts were within disturbed contexts and do not warrant designation as archaeological sites. Further, the area in the vicinity of Fort Lyon produced only modern artifacts within disturbed contexts. Based on the information provided, we concur that no further work is warranted within these nine survey areas. Additional investigations may be

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necessary at previously recorded sites 44FX0213, 44FX1211, and 44FX3256 if those resources fall within the limits of disturbance for the final project.

Architectural:

- **Jefferson Manor** (DHR ID #029-6349) is recommended ineligible for Virginia Landmarks Register (VLR) and National Register of Historic Places (NRHP) listing after reevaluating the resource as one of the four subtypes described in the Multiple Property Documentation (MPD). The report found that the district does not appear to have important associations with the wartime housing effort or post-World War II suburban development. DHR concurs that Jefferson Manor is ineligible for VLR/NRHP listing.
- **Gum Springs** (DHR ID #029-6581) In DHR's December 19, 2019, letter we requested that the consulting parties' comments be addressed and to copy us on all FTA and responses and any further correspondence. DHR has received no documentation of correspondence regarding Gum Springs to date. As was stated in the November 2019 survey, Gum Springs is an African American community, founded in 1833 by West Ford, located south of Alexandria, adjacent to Route 1. The survey found that the only architectural resources that remain from the earliest settlement is the landscape, in particular the north-south street grid that separated the four original West Ford grants to his children. A majority of the older houses were demolished in the 1960s, although there are examples of modified buildings of the earlier era. The survey recommends Gum Springs to be "overall" ineligible for VLR/NRHP listing due to the neighborhood not retaining enough historic fabric to convey its significance as a historic, long-standing African American community. The buildings in the neighborhood that do not meet the 50-year threshold were found to not meet Criteria Consideration G. The large-scale loss of physical integrity is documented in the survey results. The period of significance assessed for the report goes from the 1830s to the late 19th century.

During the last Consulting Parties telemeeting on April 16, 2020, the issue regarding the VLR/NRHP eligibility of Gum Springs was brought up. DHR suggested treating Gum Springs as eligible for the purposes of this project. DHR maintains our position that this resource be treated as eligible for the purposes of this project. Should FTA choose to treat Gum Springs as VLR/NRHP eligible for the purposes of compliance with Section 106, it should be clearly documented that this choice does not constitute a formal finding of eligibility and that further study would be necessary to make a formal determination. If treated as VLR/NRHP eligible, certain assumptions regarding criteria of eligibility and contributing resources must be made based on currently available information. FTA and DHR will coordinate and determine what the most appropriate assumptions are. It is our opinion that such an effort shows a reasonable and good faith effort on the part of the FTA to identify historic properties that may be affected by this undertaking. DHR recommends evaluating impacts to Gum Springs as a historic district and dealing with the overall impacts

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to the historic district based on the areas of the historic district within the project APE. It should be noted that DHR encourages Gum Springs to pursue further research and evaluation at the local level.

We look forward to continued consultation with the FTA and the other consulting parties as the project progresses. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me (for architectural issues) via email at adrienne.birge-wilson@dhr.virginia.gov or Roger Kirchen (for archaeology) at roger.kirchen@dhr.virginia.gov.

Sincerely,



Adrienne Birge-Wilson, Architectural Historian
Review and Compliance Division

cc: Vanessa Aguayo T., FCDOT
Douglas C. Miller, FCDOT

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DHR ID #	Resource Name/Address	Eligibility - FTA April 2020	Eligibility - DHR May 2020	Impacts- FTA April 2020	Impacts- DHR May 2020
<i>Previously Recorded</i>					
029-6349	Jefferson Manor	Not Eligible	Not Eligible	N/A	N/A
<i>Newly Identified</i>					
029-6596	House, 2809 Boswell Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6597	House, 2813 Boswell Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6598	House, 2901 Boswell Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6599	House, 2812 Boswell Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6600	House, 2900 Boswell Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6601	House, 2904 Boswell Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6602	House, 2920 Popkins Lane	Not Eligible	Not Eligible	N/A	N/A
029-6603	House, 7001 Memorial Heights Drive	Not Eligible	Not Eligible	N/A	N/A
029-6604	House, 2923 Preston Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6605	House, 6950 Memorial Heights Drive	Not Eligible	Not Eligible	N/A	N/A
029-6606	House, 2910 Preston Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6607	House, 3121 Arundel Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6608	House, 3201 Arundel Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6609	House, 3200 Arundel Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6610	House, 3122 Arundel Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6611	House, 3118 Arundel Avenue	Not Eligible	Not Eligible	N/A	N/A
029-6612	House, 3111 Collard Street	Not Eligible	Not Eligible	N/A	N/A
029-6613	House, 3115 Collard Street	Not Eligible	Not Eligible	N/A	N/A
029-6614	House, 3116 Collard Street	Not Eligible	Not Eligible	N/A	N/A
029-6615	House, 3114 Collard Street	Not Eligible	Not Eligible	N/A	N/A
029-6616	House, 3112 Collard Street	Not Eligible	Not Eligible	N/A	N/A
029-6617	House, 3110 Collard Street	Not Eligible	Not Eligible	N/A	N/A

DHR ID #	Resource Name/Address	Eligibility - FTA April 2020	Eligibility - DHR May 2020	Impacts- FTA April 2020	Impacts- DHR May 2020
029-6618	House, 3108 Collard Street	Not Eligible	Not Eligible	N/A	N/A
029-6619	House, 2627 Fairview Drive	Not Eligible	Not Eligible	N/A	N/A
029-6620	House, 2623 Fairview Drive	Not Eligible	Not Eligible	N/A	N/A



The Historical Society of Fairfax County, Virginia

P.O. Box 415, Fairfax, Virginia 22030

Mr. Daniel Koenig
U.S. Department of Transportation
Federal Transit Administration
Washington, DC Metropolitan Office
1990 K St NW, Suite 510
Washington, DC 20006

May 14, 2020

**Subject: Historical Society of Fairfax County Section 106 Comment for the
Proposed Federal Transit Authority Project for the Richmond Highway
Bus Rapid Transit, Fairfax County, Virginia**

Dear Mr. Koenig,

I would like to express our appreciation for inviting the Historical Society of Fairfax County in 2018 as a consulting party to the Richmond Highway Bus Rapid Transit Project. I apologize for belatedly accepting the invitation. Back in 2018 our society was largely dormant and in the midst of a leadership change. We were just made aware of having been invited as a Section 106 consulting party to this project and the society would appreciate being included for the duration of the process.

The society disagrees with the determination that Gum Springs (DHR No. 029-6581), Walsh Hall (the former Groveton School), the Wells Fargo Bank at 8770 Richmond Highway (DHR No. 029-6156), and the Wells Fargo Bank at 6300 Richmond Highway (DHR No. 029-6445) are NRHP ineligible. We respectfully request that you reconsider and reexamine the eligibility of these properties.

The society supports the position of the Heritage Resources staff of the Fairfax County Department of Planning and Development requesting that Gum Springs be evaluated as a TCP under National Register Bulletin #38, Guidelines for Evaluating and Documenting Cultural Properties. Gum Springs is vitally significant to Fairfax County's history as it is our oldest black community. Its connection to West Ford alone is noteworthy. Having been established as a refuge for freedmen and runaway slaves in 1833, the community provided sanctuary for African Americans through the period of slavery, segregation, and beyond. Support from Gum Springs' founding families, neighbors, churches, and schools ensured that this vitally important community has survived throughout history.

We also urge that St. Louis Catholic Church's Walsh Hall be re-evaluated. Despite the building having been moved and slightly modified over the years, the structure is significant for its role in the development of public education in Fairfax County. It was one of the first schools in the Mount Vernon School District when completed in 1888 and it is now the last surviving original one-room schoolhouse in the Route One corridor. In addition to its vital role in public education, the building holds the distinction of birthing two early churches in the community: St. Mark's Episcopal Church and St. Louis Catholic Church.

We also believe the Wells Fargo Bank (DHR No. 029-6156) at 8770 Richmond Highway should be re-evaluated. It was originally an eighteen-room house built on a working farm in 1941 by Walter Clem. He embraced the Mount Vernon copy-cat architectural movement for his residence, a style which has been prevalent in the United States for over 200 years. The building is significant because it is a solid 20th Century Mount Vernon replica and it is a visual landmark on Richmond Highway and to the community.

According to long-time residents who recall seeing a plaque in the building prior to a 1980s interior renovation, it is rumored to have a connection to the Works Progress Administration (WPA). This connection should be investigated further. After Walter Clem died in the house in 1953, his widow, Florence Clem, converted it into a tourist home known as The Colonial Inn. In 1964, newly founded Woodlawn National Bank converted the building into its first banking office which has remained in use as such for almost fifty years. Woodlawn National Bank eventually grew to have four branches and financially served and supported the development of the Route One corridor until merging with Clarendon Bank & Trust in 1973.

The building was initially selected by Woodlawn National Bank to be repurposed because the Mount Vernon image was immediately recognizable and for its association with George Washington. *The Washington Evening Star* reported on January 10, 1964, that "not many bank offices look like this" making it the only bank of its kind in Fairfax County and likely in Virginia. What is remarkable about this landmark is that after an eighty-year period of being used as a residence, a boarding house, and a bank, it continues to retain its integrity.

Lastly, we would also like to point out that although 6300 Richmond Highway (DHR No. 029-6445) has been deemed ineligible and is indeed largely altered from its original purpose, this building is also vital to the history of the Route One corridor. In 1927, Samuel Cooper Dawson Sr. partnered with Edward Monroe Pennell to build a modern highway hotel at the intersection of Route One and King's Highway. They combined the first syllables of their last names and called it the Penn-Daw Hotel.

The building has since been converted into a Wells Fargo bank however, this was the original main building of the motor hotel which is responsible for giving the Penn Daw community its name. The distinctive position of the main building at this intersection was frequently documented in photo postcards and maps throughout its operation until closing in 1973 after nearly a half-century of serving Route One travelers. It is the last surviving structure of the Penn Daw district's founding namesake. We believe because of this association the structure should not be so easily dismissed.

The Historical Society urges you to reexamine the eligibility of these properties and we appreciate being invited as a consultant to this project.

Sincerely,

A handwritten signature in cursive script, reading "Chris Barbuschak", written in dark ink. The signature is positioned above a thin horizontal line.

Chris Barbuschak
President, Historical Society of Fairfax County



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1835 Market St
Suite 1910
Philadelphia, PA 19103-2968
215-656-7100

August 13, 2020

Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Identification of Historic Properties, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722

Dear Ms. Birge-Wilson:

Federal Transit Administration (FTA) is providing funds to the Fairfax County Department of Transportation (FCDOT) for the Richmond Highway Bus Rapid Transit Project, which proposes to implement bus rapid transit (BRT) service along Richmond Highway/U.S. Route 1 and North Kings Highway/State Route 241 from the Huntington Metrorail Station to US Army Garrison Fort Belvoir. FTA is continuing Section 106 consultation for the above referenced project in accordance with 36 CFR Part 800.

Architectural Resources

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665, as amended), as implemented by the procedures for the Protection of Historic Properties (36 CFR Part 800, as revised), FTA has identified properties that may be affected by the undertaking and determined if the property or properties are eligible for listing or listed in the National Register of Historic Places (NRHP). Identification efforts are further described in submittals dated April 22, 2019, November 6, 2019, and April 7, 2020. In total for the project, 271 potential historic properties were identified within the historic architectural APE, including 135 previously documented properties and 136 newly identified properties. Of those, a total of eight historic properties as defined in 36 CFR 800.16(l) were identified within the historic architectural APE:

Woodlawn Plantation (DHR No. 029-0056),
Mount Vernon High School (DHR No. 029-0230),
Woodlawn Cultural Landscape Historic District (DHR No. 029-5181),
Fort Belvoir Military Railroad Historic District (DHR No. 029-5724),
Camp A. A. Humphreys Pump Station and Filter Building (DHR No. 029-0096),
St. Louis Catholic Church and School (DHR No. 029-5149),
A&A Rentals (DHR No. 029-6432), and
Fair Haven (DHR No. 029-6348).

In addition to the above-listed eight historic properties, FTA will be treating Gum Springs as a NHRP-eligible Historic District for the purposes of this undertaking, as suggested by DHR in their

May 8, 2020 letter. FTA previously determined the Gum Springs Historic District (DHR No. 029-6581) not eligible due to a lack of integrity but recognized the significance of the neighborhood and noted some properties within the neighborhood may be historic. Several Consulting Parties objected to this finding and requested further research including oral histories and investigation into potential Traditional Cultural Property (TCP) status. FTA discussed these requests further with DHR, who indicated that they do not currently have any guidance documents, survey guidelines or means of evaluating NRHP eligibility in reference to TCPs. At this time, evaluating TCPs is outside of the scope of which DHR can offer technical assistance and therefore, it is not reasonable for FTA to conduct a process outside of that which DHR can offer guidance.

FTA is providing the attached Gum Springs Significance Statement and Effects Assessment Memorandum as FTA's and FCDOT's assumptions of criteria of eligibility and contributing properties within the APE that will be used in assessing potential effects on the property. These assumptions are based on currently available information and have previously been discussed with DHR. While this does not constitute a formal finding of eligibility, it does allow the Section 106 process to move forward giving due consideration to the resource while taking into account existing limitations. Further study, including oral histories, is recommended in order to fully document the history of the Gum Springs community and make a formal determination of eligibility. It should be noted that DHR and FTA encourage further research and evaluation of Gum Springs at the local level.

Archaeological Resources

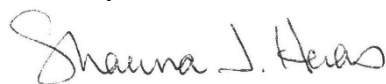
FTA submitted an Archaeological Assessment in April 2019, to which DHR staff concurred with the archaeological probability model and testing recommendations in a letter dated June 3, 2019. FTA submitted a Phase I Archaeological Survey in April 2020. On May 8, 2020, DHR staff concurred with the finding that no additional archaeological survey was warranted within the nine survey areas, but noted that additional investigations would be required should sites 44FX0213, 44FX1211, or 44FX3256 fall within the final limits of disturbance for the undertaking.

Request for Concurrence

FTA hereby submits this consolidated finding regarding identification of historic properties pursuant to 36 CFR 800.4 for your review and comment, and requests concurrence from DHR within 30 calendar days. FTA and FCDOT will then apply the criteria of adverse effect to the nine historic properties identified within the APE, and submit a Determination of Effects report for DHR concurrence and consulting party comment.

Also enclosed is a Comment Summary Matrix, containing responses to comments received from Consulting Parties following the April 7, 2020 submittal of reports. If you have any questions or comments, please contact Mr. Daniel Koenig at 202-366-8224, or via email at Daniel.Koenig@dot.gov.

Sincerely,



Shauna J. Haas
Environmental Protection Specialist

cc: Doug Miller, FCDOT
Vanessa Aguayo, FCDOT
Erin Paden, Delaware Nation
Christopher Landgraf, Department of the Army (Fort Belvoir)
Barbara Byron, Fairfax County Government, Department of Planning and Development
Elizabeth Crowell, Fairfax County Park Authority
Ross Bradford, National Trust for Historic Preservation
Anissa Brown, Virginia Department of Transportation
Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends
Ronald Chase, Gum Springs Historical Society
Chris Barbuschak, Historical Society of Fairfax County

Enclosures: Gum Springs Significance Statement and Effects Assessment Memorandum
Comment Summary Matrix
Updated notes and materials from April 16, 2020 Consulting Party Meeting

MEMORANDUM

Date: June 1, 2020

To: Shauna Haas, Environmental Protection Specialist, Federal Transit Administration,
Office of Planning & Program Development

From: Fairfax County Department of Transportation

Subject: Gum Springs Significance Statement and Effects Assessment

The Fairfax County Department of Transportation (FCDOT), in coordination with the Federal Transit Administration (FTA), is proposing to implement bus rapid transit (BRT) service extending along VA 241 / North Kings Highway and US 1 / Richmond Highway from the Washington Metropolitan Area Transit Authority (WMATA) Metrorail station at Huntington in the north to US Army Garrison Fort Belvoir in the south. The undertaking includes the construction of new BRT-dedicated median lanes; nine BRT stations; roadway widening; and streetscape improvements. The BRT system would operate in both dedicated and mixed traffic lanes within the project limits.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665, as amended), as implemented by the procedures for the *Protection of Historic Properties* (36 CFR Part 800, as revised), FTA is working to identify properties that may be affected by the undertaking and determine if the property or properties are historic as determined by eligibility or listing in the National Register of Historic Places (NRHP). FTA previously determined Gum Springs not eligible for listing in the NRHP due to a lack of integrity, but recognized the significance of the neighborhood and noted some properties within the neighborhood may be historic. In response to Consulting Party objections to this finding, and a lack of guidance and resources to pursue additional research regarding potential Traditional Cultural Property status, FTA will be treating Gum Springs as eligible for listing in the NHRP for the purposes of this project, as suggested by Virginia Department of Historic Resources (DHR) in their May 8, 2020 letter. This memo provides some background and assumptions for use in assessing potential effects on the property and continuing the Section 106 process. These assumptions do not constitute a formal finding of eligibility and are based on currently available information, including documents recently provided by Mr. Chase. Further study would be necessary, including oral histories, in order to fully document the history of the community and make a formal determination of eligibility.

For the purposes of Section 106 consultation for this undertaking, the Gum Springs Historic District (DHR No. 029-6581) is being treated as eligible for listing in the NRHP and Virginia Landmarks Register (VLR) under Criterion A for its association with the African-American community in Fairfax County. The purpose of the current document is to provide assumptions regarding criteria of eligibility and contributing resources for those portions of the resource located within the undertaking's Area of Potential Effects

MEMORANDUM

(APE), and to provide an overview of potential direct and indirect effects to significant elements that may be affected as a result of the undertaking. The document will assist FTA in their consultation with the Virginia Department of Historic Resources (DHR).

Significance Statement

The Gum Springs Historic District (DHR No. 029-6581) is located within the middle portion of the APE, between Napper Road and Fordson Road. It is an approximately 200-acre historically African-American community located to the east of Richmond Highway / U.S. Route 1 (see **Figure 1**). The neighborhood is roughly bound by Holland Road to the east, Little Hunting Creek to the south, and Richmond Highway / U.S. Route 1 to the west. The northern limits extend from the northwest to the southeast along the rear property lines of several small residential developments which front Fordson Road. **Figure 2** and **Figure 3** show the limits of Gum Springs and preliminary project design.

Gum Springs is a long-standing African-American community established in 1833 by West Ford, a free person of color who had been enslaved at the Mount Vernon plantation, when he purchased a 214-acre tract of land known as Gum Spring Farm. Ford's descendants settled in the area, and, by the late nineteenth century, a small farming community had been established with homes, a school and a church. The neighborhood continued to grow in the first half of the twentieth century, and a surge of new construction occurred during World War II to house Black soldiers stationed at nearby Fort Belvoir. After the war, rampant suburbanization changed the neighborhood as commercial development occurred along Richmond Highway / U.S. Route 1 and new residential neighborhoods were constructed in adjacent areas. The loss of well-paying farming jobs led to a loss of income for residents, who, while never affluent, had generally been able to sustain a middle-class standard of living. This decline into poverty, coupled with a lack of government infrastructure investment and discrimination by financial institutions, created poor housing conditions in the neighborhood, including the lack of paved streets, stormwater management, and water and sewer access. New minimum housing codes established by Fairfax County in the early 1960s led to widespread demolition of many early Gum Springs houses. Outraged by the effect these demolitions were having on the neighborhood's character, local leaders organized and advocated for improvements to the neighborhood that would retain the residential character of Gum Springs. They were one of the first communities to receive funding under federal anti-poverty programs in the 1960s, and residents worked collectively to improve housing conditions in the neighborhood using a variety of funding sources. Additional historic context was provided in the Historic Architectural Survey Technical Report (April 2019) prepared for the current undertaking.

For the purposes of Section 106 consultation for this undertaking, the resource is being treated as eligible for listing in NRHP and VLR under Criterion A for its association with the African-American community in Fairfax County. Beginning in the 1830s, the community grew from a small rural settlement consisting of several tight-knit families to a bustling Black enclave by the early twentieth century. Postwar suburbanization, the loss of an agricultural economy, a lack of public investment, and the establishment of new minimum housing standards in the 1960s distressed the once thriving neighborhood. Evictions and demolitions in the neighborhood spurred activism and led to the establishment of new community institutions and the construction of a series of new affordable housing developments, remaking the physical fabric of the neighborhood. The period of significance extends from the community's

MEMORANDUM

establishment in 1833 to 1973 when President Richard Nixon declared a moratorium on housing and community development assistance programs financed through the U.S. Department of Housing and Urban Development (HUD).

Within the current undertaking's APE, there are a total of three contributing resources (DHR No. 029-6045, 029-6107, and 029-6361) and three non-contributing resources (DHR No. 029-6198, 029-6199, and 029-6200). The remainder of parcels located within the current undertaking's APE and the boundary of Gum Springs contain buildings that were not constructed within the period of significance, and/or are not yet 50 years of age and do not meet Criteria Consideration G. No additional landscape features were noted during fieldwork to identify historic resources or during archaeological fieldwork in this area. Although several previously archaeological surveys have included this portion of the current undertaking's APE, there were no previously recorded archaeological sites identified. This portion of the APE was again evaluated for archaeological potential as part of the Archaeological Assessment Technical Report (October 2019) prepared for the current undertaking. As part of the Phase I archaeological survey (April 2020), shovel testing was completed in three areas (A, B, and C) within Gum Springs. No new archaeological sites were identified.

MEMORANDUM

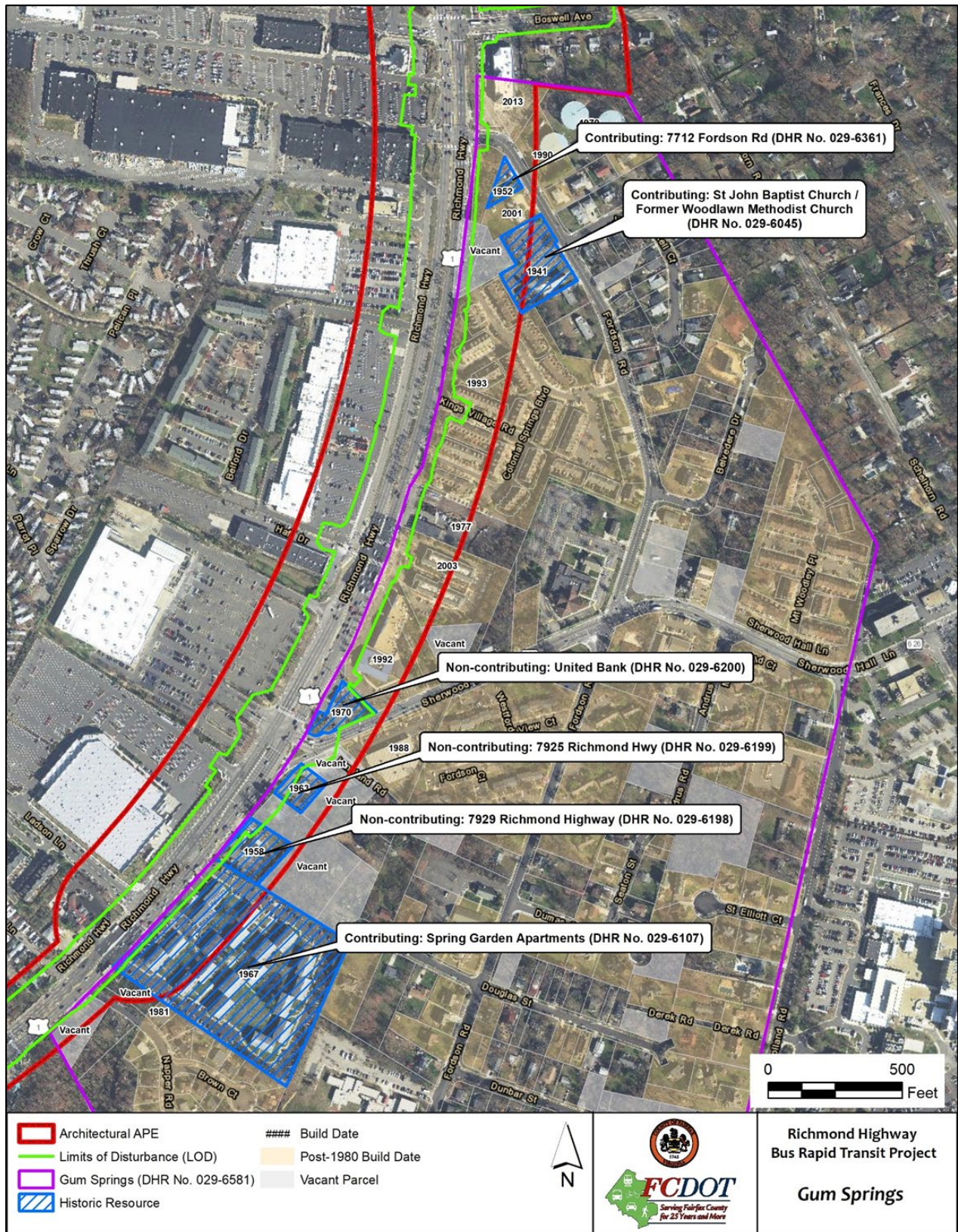


Figure 1: Map of Gum Springs Historic District (DHR No. 029-6581)

MEMORANDUM

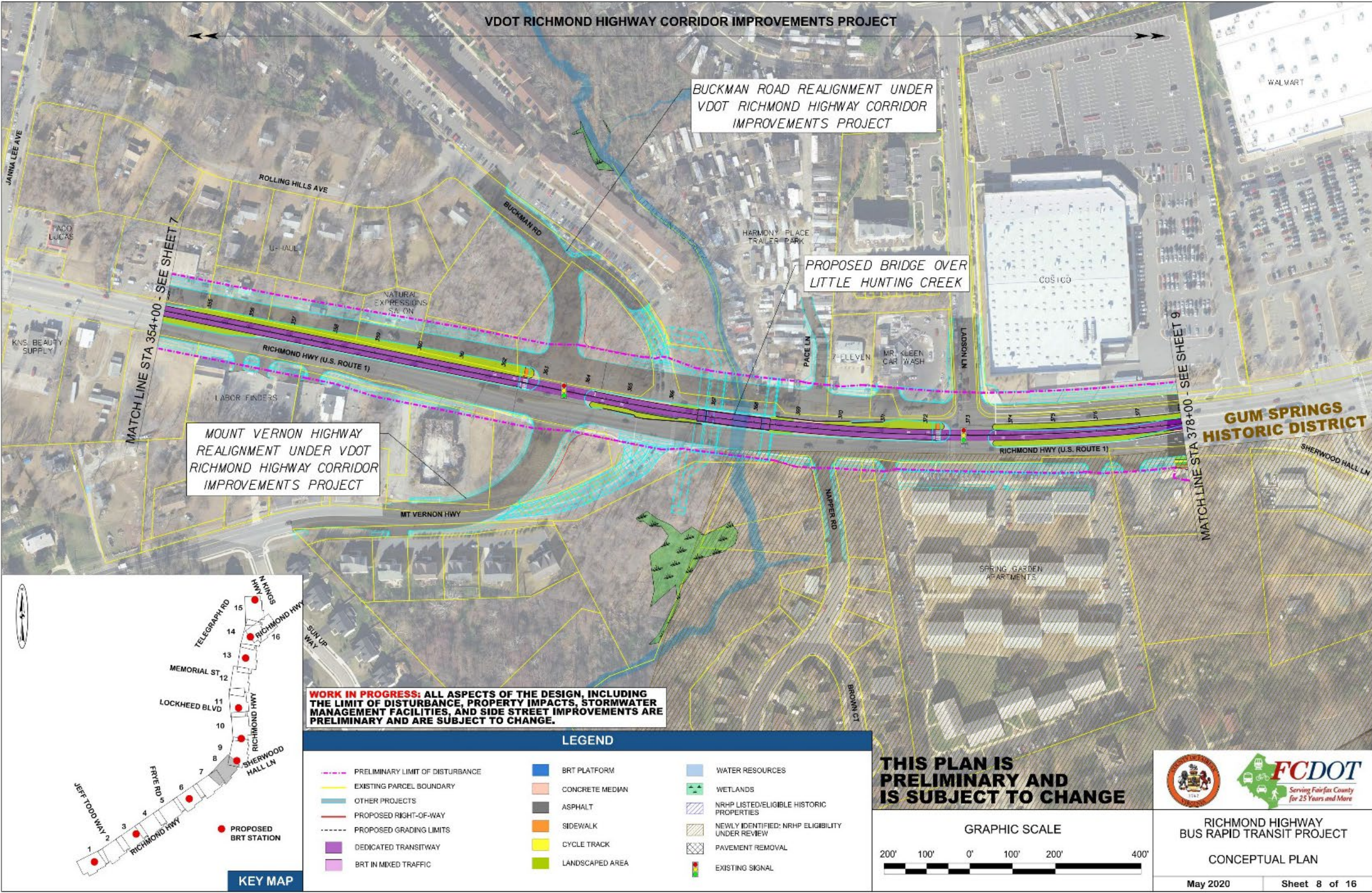


Figure 2: Map of Gum Springs Historic District (DHR No. 029-6581) and Preliminary Project Design

MEMORANDUM

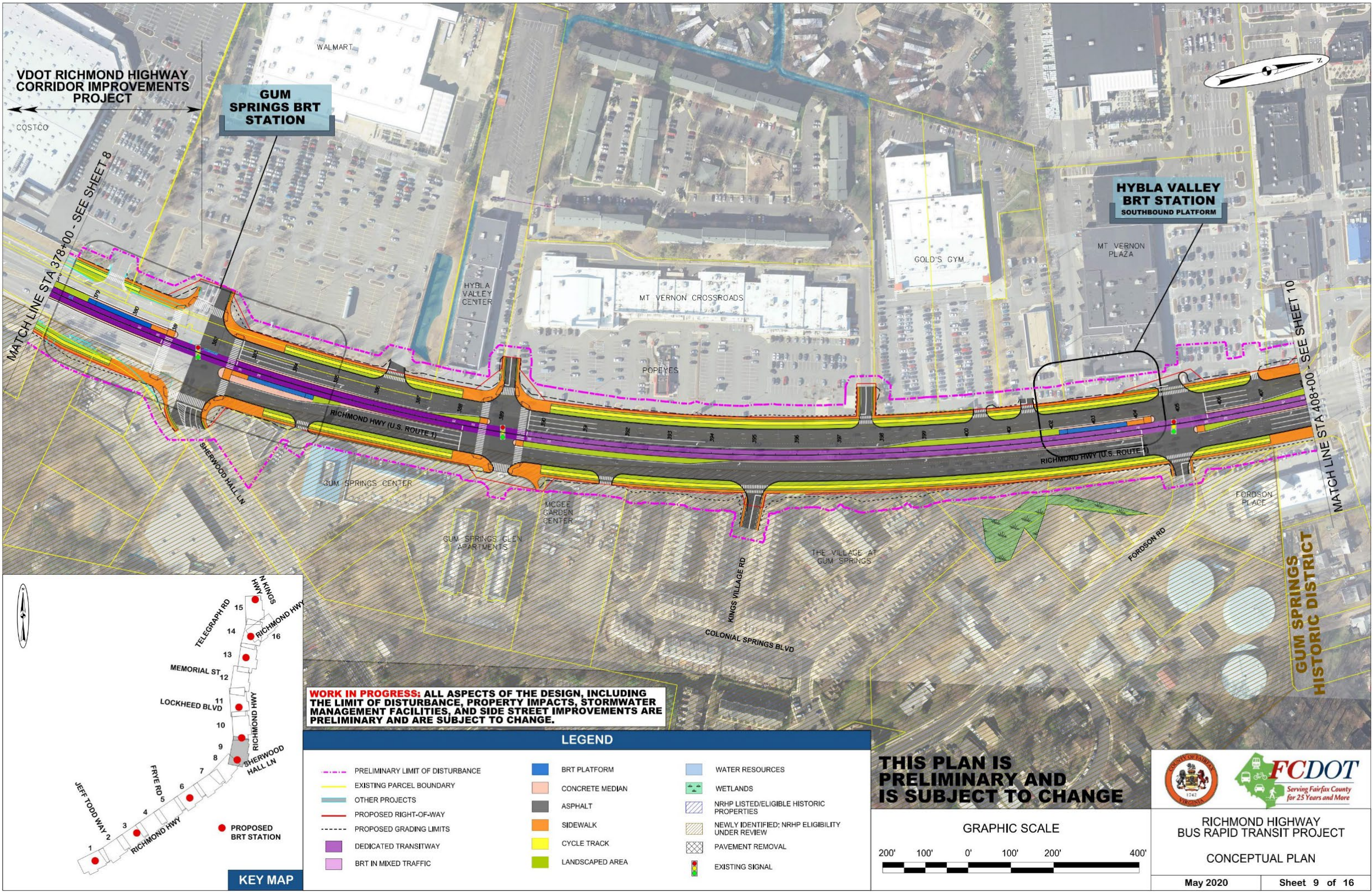


Figure 3: Map of Gum Springs Historic District (DHR No. 029-6581) and Preliminary Project Design

MEMORANDUM

Contributing Resources

St. John Baptist Church / Former Woodlawn United Methodist Church (DHR No. 029-6045)

The resource was initially surveyed in 2006 by Fairfax County and listed in the Fairfax County Inventory of Historic Sites. No NRHP eligibility determination was completed at the time of survey. The resource was resurveyed and evaluated for listing in the NRHP as part of this undertaking. It was recommended not individually eligible for listing in the NRHP and DHR staff concurred in May 2019.



Former Woodlawn United Methodist Church (DHR No. 029-6045), Facing Southwest

With close ties to the Quaker community, the Woodlawn United Methodist congregation was established after the Civil War and historically worshipped at a church building located along Woodlawn Road. In 1940, the U.S. Army incorporated the land into Fort Belvoir and required the congregation to relocate. In 1941, the church building at 7730 Fordson Road was constructed in Gum Springs, where much of the congregation either lived or had close community ties. Between 2012 and 2014, the Woodlawn Methodist Church congregation constructed a new building at 7010 Harrison Lane, outside of Gum Springs, and subsequently moved. The property is currently occupied by St. John Baptist Church. As one of several religious institutions in the neighborhood, the church played a central role for worship, social, and community life in Gum Springs from the 1940s to 1960s.

The undertaking would not result in right-of-way acquisition at this location. The proposed widening of Richmond Highway / U.S. Route 1 is located approximately 200 feet to the west of the resource. A heavily wooded parcel lies between the roadway and the back of the church parcel. Therefore, there will be no direct physical destruction or alteration of the property, nor will there be changes to the character of the property's use or physical features that contribute to the significance. While located within the APE, there are no visual, atmospheric, or audible effects with the potential to diminish the integrity of the property's significant features anticipated in this area.

MEMORANDUM

Spring Garden Apartments (DHR No. 029-6197)

The resource was initially recorded in 2017 on behalf of VDOT. It was recommended not individually eligible for listing in the NRHP and DHR staff concurred in May 2017. The resource was not reevaluated as part of the identification effort for the current project since fewer than five years have elapsed.



Spring Garden Apartments (DHR No. 029-6197), Facing South

In response to the widespread demolition of “dilapidated” housing in the neighborhood during the early 1960s, local contractor Jube Shriver partnered with Bruce A. Saunders, who owned land along Richmond Highway / U.S. Route 1, to construct community housing. In 1965, the partners received Federal Housing Administration (FHA) funding to construct a 209-unit garden apartment complex for low and middle-income residents on the property. Twenty units were reserved for welfare recipients and the rest were rented for between \$80 and \$126 per month. A *Washington Post* article noted that the recently completed Spring Garden Apartments for middle-income Gum Springs residents “cannot help but to upgrade the neighborhood” (Klose 1968, G12; Hoffman 1965, E2; Chase 1990, 72-5, 80-1). The apartments represent the important role of local community-driven housing initiatives planned and developed by the African-American community in direct response to the “slum clearance” policies undertaken by local government in the 1950s and 1960s.

At this resource, a portion of the existing parking area along Richmond Highway / U.S. Route 1 will be acquired as part of the undertaking. The minor acquisition of right-of-way at this resource will not result in changes to the character of the property’s use or physical features that contribute to the significance. While located within the APE, there are no visual, atmospheric, or audible effects with the potential to diminish the integrity of the property’s significant features anticipated in this area.

MEMORANDUM

7712 Fordson Road (DHR No. 029-6361)

The resource was newly surveyed as part of the current project. It was recommended not individually eligible for listing in the NRHP and DHR staff concurred in May 2019.



7712 Fordson Road (DHR No. 029-6361), Facing Southwest

Constructed in 1952, the one-story Minimal Traditional house is located on the southern portion of the parcel. The home is representative of the modest homes built within the neighborhood during the post-WWII period. Although the ownership history is unknown at this time, the home's close proximity to the Former Woodlawn United Methodist Church may indicate an association with members of the congregation.

The undertaking would not result in right-of-way acquisition at this location. The proposed widening of Richmond Highway / U.S. Route 1 is located approximately 75 feet to the west of the resource. A heavily wooded parcel lies in between the roadway and the back of the residential parcel. Therefore, there will be no direct physical destruction or alteration of the property, nor will there be changes to the character of the property's use or physical features that contribute to the significance. While located within the APE, there are no visual, atmospheric, or audible effects with the potential to diminish the integrity of the property's significant features anticipated in this area.

Non-contributing

7929 Richmond Highway (DHR No. 029-6198)

The resource was initially recorded in 2017 on behalf of VDOT. It was recommended not individually eligible for listing in the NRHP and DHR staff concurred in May 2017. The resource was not reevaluated as part of the identification effort for the current project since fewer than five years have elapsed.

MEMORANDUM

Constructed in 1958, this commercial building first housed Ernie's Original Crab House. Ernie's was purchased in the 1980s and appears to have relocated. The building has subsequently housed a variety of businesses. There are no known historic associations with Gum Springs or the African-American community.



7929 Richmond Highway (DHR No. 029-6198), Facing Northeast

7925 Richmond Highway (DHR No. 029-6199)

The resource was initially recorded in 2017 on behalf of VDOT. It was recommended not individually eligible for listing in the NRHP and DHR staff concurred in May 2017. The resource was not reevaluated as part of the identification effort for the current project since fewer than five years have elapsed.



7925 Richmond Highway (DHR No. 029-6199), Facing South

Constructed in 1963, this building appears to have been designed as a residence but has functioned as a commercial office since at least the 1970s. The building has housed several different businesses over the years. There are no known associations with Gum Springs or the African-American community.

MEMORANDUM

7901 Richmond Highway / United Bank (DHR No. 029-6200)

The resource was initially recorded in 2017 on behalf of VDOT. It was recommended not individually eligible for listing in the NRHP and DHR staff concurred in May 2017. The resource was not reevaluated as part of the identification effort for the current project since fewer than five years have elapsed.



7901 Richmond Highway (DHR No. 029-6200), Facing East

Constructed in 1970, this commercial building has always functioned as a bank office. The building has housed branch offices for several large banking companies and is currently a United Bank. There are no known associations with Gum Springs or the African-American community.

Effects Assessment

For the purposes of Section 106 consultation for this undertaking, the Gum Springs Historic District (DHR No. 029-6581) is being treated as eligible for listing in the NRHP and VLR under Criterion A for its association with the African-American community in Fairfax County. The period of significance extends from 1833 to 1970. Within the current undertaking's APE, there are a total of three contributing resources (DHR No. 029-6045, 029-6107, and 029-6361) and three non-contributing resources (DHR No. 029-6198, 029-6199, and 029-6200).

In accordance with the *Protection of Historic Properties* (36 CFR Part 800, as revised), the FTA has applied the criteria of adverse effect to historic properties within the APE. As stated in the guidance, an "adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" (36 CFR 800.5(a)(1)).

Upon applying the criteria of adverse effects, FTA has found that the proposed undertaking would have *no adverse effect* to the Gum Springs Historic District (DHR No. 029-6581) or any contributing elements located within the undertaking's APE.

COMMENT SUMMARY

Date: August 12, 2020

To: Virginia Department of Historic Resources (DHR) and Consulting Parties

From: The Federal Transit Administration (FTA) and Fairfax County Department of Transportation (FCDOT)

Subject: Responses to Consulting Party Comments Received in May 2020

This comment response matrix has been prepared to provide responses to all comments received subsequent to the submission of Section 106 documents on April 7, 2020 and the Consulting Party (CP) meeting on April 16, 2020. Below, comments have been organized by the submitting CP. Each comment has been reproduced verbatim or abridged for presentation purposes; FCDOT and FTA responses are provided in the “Response” column. FTA and FCDOT appreciate the comments and contributions received to-date from CPs.

Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
Adrienne Birge-Wilson; Virginia Department of Historic Resources	5/8/2020	Email; pdf	Yes	Summarized the results of the Phase I Archaeology Survey and concurred that no further work is warranted within the nine survey areas. Stated that additional investigations may be necessary at previously recorded sites 44FX0213, 44FX1211, and 44FX3256 if those resources fall within the limits of disturbance for the final project.	FTA and FCDOT acknowledge that should previously recorded sites 44FX0213, 44FX1211, and 44FX3256, which are currently within the Archaeological Review Area but not the limits of disturbance (LOD), fall within the LOD for the project, Section 106 will be re-initiated and additional archaeological testing or evaluation of NRHP eligibility would be carried out.
				Concurred that Jefferson Manor is ineligible for Virginia Landmarks Register (VLR)/National Register for Historic Places (NRHP) listing.	FTA and FCDOT acknowledge DHR’s concurrence that Jefferson Manor (DHR No. 029 6349) is not eligible for the VLR or NRHP.
				Stated that in DHR's 12/19/19 letter it was requested that CP comments be addressed and to copy DHR on all FTA responses and further correspondence. DHR has received no documentation of correspondence regarding Gum Springs to date.	FTA and FCDOT previously addressed CP comments thematically as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. A complete set of CP comments received by FTA and FCDOT prior to April 7, 2020 was provided via email on May 8, 2020. FTA and FCDOT will continue to copy or forward any further correspondence to DHR.
				DHR maintains the position that Gum Springs be treated as eligible for the purposes of this project; states that should FTA choose to treat Gum Springs as VLR/NRHP eligible for the purposes of compliance with Section 106, it should be clearly documented that this choice does not constitute a formal finding of eligibility and that further study would be necessary to make a formal determination. If treated as VLR/NRHP eligible, certain assumptions regarding criteria of eligibility and contributing resources must be made based on currently available information. FTA and DHR will coordinate and determine what the most appropriate assumptions are. It is DHR’s opinion that such an effort shows a reasonable and good faith effort on the part of the FTA to identify historic properties that may be affected by this undertaking. DHR recommends evaluating impacts to Gum Springs as a historic district and dealing with the overall impacts to the historic district based on the areas of the historic district within the project APE. DHR encourages Gum Springs to pursue further research and evaluation at the local level.	FTA and FCDOT are treating Gum Springs (DHR No. 029-6581) as eligible for the purposes of this undertaking in accordance with DHR’s recommendation. FTA has discussed with DHR and is formally submitting their assumptions regarding the significance, criteria of eligibility and contributing properties within the APE that will be used in the treatment of the Gum Springs Historic District as a NRHP-eligible property going forward with this project. As noted, this does not constitute a formal determination. The Determination of Effects report will include effects to Gum Springs that may result from the current undertaking. A determination of no adverse effect to Gum Springs is anticipated.
				Appended table shows that DHR concurs that the additional properties evaluated within the expanded APE are not eligible for the NRHP.	FTA and FCDOT acknowledge DHR’s concurrence that the 25 newly identified resources (DHR No. 029-6596 to 029-6620) are not eligible for the VLR or NRHP.
Ross Bradford; National Trust for Historic Preservation	5/21/2020	Email	Yes	The National Trust continues to express concern regarding FTA’s efforts to minimize impacts to Woodlawn. Specifically, the limits of disturbance depicted in the presentation materials appears to be unchanged since the Public Information Meeting on September 17, 2019. As currently depicted the	Staff from FTA and FCDOT met with Ross Bradford from the National Trust on June 11, 2020 to discuss design at the Woodlawn property independently of the Section 106 process. The project team presented the latest project design and discussed updates to the limits of disturbance since the Public Information Meeting on September 17, 2019.

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Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
				limits of disturbance are not minimized to avoid unnecessary impacts to Woodlawn. The National Trust requests that FTA set up a meeting to discuss efforts since September 17, 2019 to minimize or avoid these impacts. The National Trust also requests that FTA confirm that the storm water management facilities depicted in the September 17, 2019 maps have been reviewed and remain unchanged (i.e., they are the only storm water management facilities being installed in this section of the project).	
				The National Trust is concerned that the FTA did not include VDHR in its correspondence regarding community outreach to determine the eligibility of Gum Springs as described in VDHR’s May 8, 2020 letter to the FTA.	In a letter dated December 9, 2019, DHR requested that FTA and FCDOT address comments from CPs regarding Gum Springs, and that DHR be included on those responses and any further correspondence. Subsequently, FTA and FCDOT addressed DHR and CP comments regarding Gum Springs as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. The current comment summary provides additional responses to CPs. DHR has been included on all recent correspondence with other CPs and comments regarding the eligibility of Gum Springs. FTA will continue to coordinate with DHR regarding the assumed NRHP eligibility of the Gum Springs Historic District and potential effects resulting from the current undertaking.
				During the April 16, 2020 meeting it became clear that there were significant flaws in FTA’s outreach efforts as noted by Ronald Chase. For example, FTA appeared to be unaware of an existing study on Gum Springs, which suggests that the FTA has so far failed to meet the level of effort needed to comply with Section 106, specifically that it “make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey [and] ... take into account past planning, research and studies....”	Extensive community outreach was documented as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. On August 5, 2019 staff met with Mr. Ronald Chase, President of the Gum Springs Historical Society, to solicit historical information and potential contact information of other local sources that may have information regarding the African American community. Information provided by Mr. Chase included additional primary and secondary sources that aided in the development of the historic context for Gum Springs. At the consulting party meeting on September 4, 2019 the potential for oral history research was discussed, and several consulting parties, including Mr. Chase, were asked to provide any contact information of people from the community that may have information or be willing to participate in historical research. An email was sent to Mr. Chase on September 9, 2019 to follow up regarding community contact information. On September 13, 2019 emails were sent to Katina Matthews and Pallas Washington of Fairfax County Neighborhood and Community Services, with the hope that they may be able to provide additional local contacts (given that they work with the Richmond Highway community). On September 17, 2019, a public meeting was held at Bryant High School. One citizen in attendance responded that they were a long-time resident of Gum Springs but declined a request to participate in historical research. A community outreach meeting was held at the Gum Springs Community Center on October 8, 2019. At this meeting an announcement was made requesting names and contact info from persons who might be willing to participate in historical research related to Gum Springs. Two citizens came forward and expressed interest. Neither community member responded to follow-up inquiries. Following the April 16, 2020 consulting party meeting, there continued to be no members of the community willing to discuss the significance of Gum Springs with the project team. To-date, no additional members of the Gum Springs community with information regarding historic properties or with an interest in participating in oral histories have come forward. Although FTA and FCDOT agree that Gum Springs should be treated as eligible for the purposes of this project, additional historical information or oral history interviews from community members would benefit evaluation of the resource at the local level outside the Section 106 process for this undertaking. FTA and FCDOT were previously aware of the documents (The Land of Gum Springs [Corbin 1981], Feasibility Study: Black History Museum [Center for History Now 1985], and A History of Gum Springs [Saunders Burton 1986]) provided by Mr. Ron Chase. The documents provide excellent historical research on the Gum Springs community; however, much of this information is replicated in other sources that were previously cited in FCDOT reports. John

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Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
					Terry Chase's book, <i>Gum Springs: The Triumph of a Black Community</i> , was published in 1990 and synthesizes much of the research included in these earlier documents. The sources above all provide valuable historical research that adds to our understanding of Gum Springs and helps in establishing a historic context to evaluate the significance of the community. However, as stated in the NRHP evaluation for the resource, a clear association under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) exists. So while there is abundant evidence that Gum Springs has historic significance, the built environment did not convey the significance adequately to be determined eligible for listing in the NRHP at this time.
				The notes from the April 16, 2020 meeting do not accurately depict the collective concern expressed by multiple consulting parties regarding FTA’s lack of effort made to carry out its obligations under Section 106.	Meeting notes from the April 16, 2020 are intended to provide an overview of topics discussed and any comments received. The project team has updated the meeting notes and redistributed with increased emphasis on the concerns expressed by multiple consulting parties.
				The National Trust suggests that the FTA review National Register Bulletin 38 “Guidelines for Evaluating and Documenting Traditional Cultural Properties” and consider ways in which this guidance may inform the assessment of Gum Springs and its eligibility.	Gum Spring's potential significance as a traditional cultural property (TCP), in consideration of National Register Bulletin 38 “Guidelines for Evaluating and Documenting Traditional Cultural Properties,” was addressed previously, as a response to similar comments in the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. The topic was discussed with DHR following the last consulting party meeting. DHR responded that they do “not currently have any guidance documents, survey guidelines or means of evaluated NRHP eligibility in reference to TCPs. At this time, evaluating TCPs is outside the scope of which DHR can offer technical assistance and therefore, it is not reasonable to direct FTA to conduct a process outside of that which we can offer guidance. However, we recognize the importance of this historic community and continue to recommend this for further study and we can lend support to that which is in our purview. It should be noted that DHR staff reached out to the Advisory Council for Historic Preservation (ACHP) via email on April 20, 2020, for any case studies, white papers, etc., that could help provide a methodological approach for surveying and assessing African-American related TCPs for NRHP eligibility. On April 22, 2020, the ACHP informed us that they are not aware of any such documents.”
Ronald Chase; Gum Springs Historical Society	5/21/2020	Email	Yes	Concerned about the limited information that was compiled on the history of Gum Springs.	The historic context prepared by FTA and FCDOT and included in the Addendum to the Historic Architectural Survey Technical Report (November 2019) was guided by DHR’s <i>Guidelines for Conducting Historic Resources Survey in Virginia</i> (DHR 2017). While not intended to serve as a comprehensive history of the community, research methods employed were similar to those that have been developed for similar properties. The intent of the historic context is to provide sufficient historical information to place the resource within appropriate local, statewide, and national contexts, and to allow a meaningful application of the NRHP criteria as described in the National Park Service’s <i>National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation</i> (NPS 1990). As stated in the NRHP evaluation for the resource, a clear association under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) exists; however, the built environment did not convey the significance adequately to be determined eligible for listing in the NRHP at this time. FTA and FCDOT agree that in lieu of continuing research beyond our limitations, Gum Springs should be treated as eligible for the purposes of this project. FTA and FCDOT agree with DHR’s recommendation for further research and evaluation of Gum Springs at the local level outside the Section 106 process for this undertaking.
				Voiced concern regarding archaeological elements identified in the report, stating that "an identified lot may be described as inadequate for research, when a lot next to it will have archeological artifacts that would qualify it for	The archaeological potential within the undertaking's APE was evaluated as part of the Archaeological Assessment (April 2019). Archaeological potential was evaluated based on a combination of background research including primary and secondary sources, historic maps, soil survey data, historic aerials, and a review of the current conditions. In some cases, the

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Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
				a determination of meeting the requirements," and states that he will provide the lot identifiers in the next submission.	presence of modern buildings or construction activity informed the likelihood of encountering intact archaeological deposits. While one lot within the community may be reviewed and considered to have a low potential given its historical use and level of documented ground disturbance, a nearby lot may be reviewed and considered to have a high potential given its use and potential for intact archaeological deposits. The intent of the archaeological assessment was to gauge the archaeological potential and make recommendations based on the research compiled. In June 2019, DHR concurred with the archaeological probability model for unsurveyed areas and the recommended Phase I survey of nine survey areas included in the Archaeological Assessment. Those areas identified as having suitable potential for intact archaeological deposits were investigated as part of the Phase I Archaeological Survey (April 2020). In May 2020, DHR concurred that no further work was warranted within the nine survey areas and that additional investigations may be necessary at previously recorded sites 44FX0213, 44FX1211, and 44FX3256 if those resources fall within the limits of disturbance for the final project. Additional areas within Gum Springs were surveyed as part of the Cultural Resources Survey for the Widening of U.S. Route 1 (October 2016 and February 2017).
	5/21/2020; 5/27/2020	Email with pdf; physical binders		Submitted the pdf of "A History of Gum Springs, Virginia," a dissertation by Judith Saunders-Burton from December 1985. Dropped off two binders containing reports called "The Land of Gum Springs" and "History Now."	FCDOT reviewed the materials provided and were previously aware of the documents (The Land of Gum Springs [Corbin 1981], Feasibility Study: Black History Museum [Center for History Now 1985], and A History of Gum Springs [Saunders Burton 1986]). The documents provide excellent historical research on the Gum Springs community; however, much of this information is replicated in other sources that were utilized in the FCDOT reports. John Terry Chase's book, <i>Gum Springs: The Triumph of a Black Community</i> , was published in 1990 and synthesizes much of the research included in these earlier documents. The sources above all provide valuable historical research that adds to our understanding of Gum Springs and helps in establishing a historic context to evaluate the significance of the community. However, as stated in the NRHP evaluation for the resource, a clear association under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) exists. So while there is abundant evidence that Gum Springs has historic significance, the built environment does not retain historic integrity needed to adequately convey the significance and be determined eligible for listing in the NRHP at this time.
Martha Claire Catlin; Alexandria Monthly Meeting of the Religious Society of Friends	5/21/2020	Email with pdf	Yes	Outreach to Stakeholders – 36 CFR Sections 800.2(d); 800.3(e); and 800.3(f), including 800.3(f)(1); and 800.4(a)(3). My comments have often raised the issue of outreach to “persons and organizations likely to have knowledge of, or concerns with, historic properties in the area” potentially affected by the BRT [36 CFR 800.4(a)(3)]. As stated in my letter of December 2, 2019: Based on the invitees to the meeting of September 4, only three areas within the defined area of potential effect were represented by nongovernmental stakeholders: Woodlawn Meetinghouse, Woodlawn/Pope-Leighey (both included in the Woodlawn Cultural Landscape Historic District), and Gum Springs. Stakeholders and interested parties from all areas of the Route One corridor should also be provided an opportunity to be represented. Responses to this concern from FTA/Fairfax County DOT have followed a pattern of stating that such parties should come forward on their own initiative and specifically request Consulting Party status. That would be reasonable in some circumstances. However, many would not even know what that would entail, and would not, to my knowledge, have learned enough about the opportunity to participate in a Section 106 consultation process from statements or public information disseminated about the project. Further, it is FTA who stands to gain from participation by those with knowledge of the history that relates to the properties FTA has been in the	Previous comments on a variety of topics, including stakeholder involvement, were addressed by theme as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. Additional nongovernmental stakeholders were invited to participate and have chosen not to. As Ms. Catlin pointed out, she provided the name of one individual, Ms. Barbara Keck, whose husband was a firefighter at the Penn Daw Fire Station. Ms. Keck submitted an email comment regarding a separate development project and did not specifically note any interest in the current undertaking. Further, Ms. Keck does not seem to meet the threshold of having a “demonstrated interest in the undertaking” pursuant to 36 CFR 800.2(c)(5), beyond that of the general public, nor does Ms. Keck seem to have specific “knowledge of, or concern with, historic properties in the area” pursuant to 36 CFR 800.4(a)(3). In terms of public involvement pursuant to 36 CFR 800.2(d), “the agency official may use the agency's procedures for public involvement under the National Environmental Policy Act or other program requirements in lieu of public involvement requirements in subpart B of this part, if they provide adequate opportunities for public involvement consistent with this subpart.” In accordance with a coordinated Section 106 and NEPA public involvement plan, extensive community outreach has been completed for areas throughout the project corridor. Multiple public and neighborhood-specific meetings have been held at various locations within the corridor and comments from the public and other potential stakeholders have been solicited regarding the identification of historic properties on multiple occasions.

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Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
				process of identifying and evaluating historic properties. One contribution that Consulting Parties can make to assist in moving the Section 106 process forward is to bring to the federal agency’s attention the existence of other individuals or entities who may have an interest in, or knowledge of, historic properties, whether or not they wish to become Consulting Parties. My attempts to do so (conveyed in person at the meeting of September 9, 2019; and via written comments of October 4, October 9, December 1, and December 2, 2019; and January 10, 2020) were unsuccessful. To remedy these omissions going forward, and to ensure that both the spirit and the letter of the Section 106 regulations are met, I believe FTA should review its Section 106 procedures to “seek and consider the views of the public” pursuant to 36 CFR 800.2(d); and “involve the public” and “identify other consulting parties” pursuant to 36 CFR Sections 800.3(e); and 800.3(f), including 800.3(f)(1), “Involving local governments and applicants.”	Specific dates of all public meetings and community outreach meetings were provided in the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. Additional community outreach continues in accordance with Section 106 and NEPA. Pursuant to 36 CFR 800.3(f)(3), “the agency official shall consider all written requests of individuals or organizations to participate as consulting parties.” To date, FTA and FCDOT have not received additional requests from parties with a demonstrated interest in the undertaking.
				Gum Springs Historic Properties – “Level of Effort” pursuant to 36 CFR 800.4(b)(1). Many of my comments have pertained to the recommendation by FTA that Gum Springs properties are ineligible for the National Register. As stated in my comments of December 2, 2019, in response to the “Richmond Highway Bus Rapid Transit Project ADDENDUM TO THE HISTORIC ARCHITECTURAL SURVEY TECHNICAL REPORT for Fairfax County Department of Transportation” (Report): I particularly object to your ruling out, at this early stage in the Section 106 consultation process, the reasonable possibility that National Register eligibility can be fully supported through an appropriate level of investigation of the history of Gum Springs. Any such determination should take into consideration factors in the community’s potential eligibility such as the long-term survival of cultural traditions, established during its beginnings as a free African American community nearly two centuries ago. I support the recommendation of the Virginia SHPO (Letter of May 8, 2020) to consider a Gum Springs Historic District as eligible for the National Register for purposes of the Section 106 process. However, the next step in the Section 106 process, evaluation of effects to historic properties, cannot be accomplished meaningfully without a fuller recognition of the characteristics upon which a “considered eligible” determination would be based. Accordingly, further discussions with the SHPO, as she suggests and offers, will be critical. It will also be critical for those discussions to reflect close coordination with the Gum Springs Historical Society as represented by its President, Ron L. Chase. While others are available to assist as needed, FTA should rely on the expertise and advice Mr. Chase offers, and is uniquely able to provide. Appropriate methodologies for oral interviews should be developed in consultation with Mr. Chase and implemented under his direction. It should not be forgotten that the nature of Gum Springs as a historic property is that it should be seen through a lens of continuity of traditions, and therefore, any view from the outside – even, and sometimes especially, those of cultural resource practitioners – can introduce distortions and miss substance. Such efforts can also alienate potential subjects of oral interviews. Efforts at the local level – now being pursued by Fairfax County DPD and encouraged by the SHPO as stated in her letter – should prove helpful to FTA in meeting its responsibilities to assess effects to the historic characteristics of Gum Springs.	Gum Spring's potential significance as a TCP, in consideration of National Register Bulletin 38 “Guidelines for Evaluating and Documenting Traditional Cultural Properties,” was addressed previously, as a response to similar comments, as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. Further, Gum Springs and the limitations of current TCP guidance are addressed in previous responses in the current document. The historic context prepared by FTA and FCDOT was guided by DHR’s <i>Guidelines for Conducting Historic Resources Survey in Virginia</i> (DHR 2017). While not intended to serve as a comprehensive history of the community, the historic context provides sufficient historical information to place the resource within appropriate local, statewide, and national contexts, and to allow a meaningful application of the NRHP criteria as described in the National Park Service’s <i>National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation</i> (NPS 1990). As stated in the NRHP evaluation for the resource, a clear association under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) exists; however, the built environment does not convey the significance adequately to be determined eligible for listing in the NRHP. Moving forward with the project, FTA and FCDOT are treating Gum Springs (DHR No. 029-6581) as eligible for the purposes of this undertaking. FTA has discussed with DHR and is submitting their assumptions regarding the significance, criteria of eligibility and contributing properties within the APE that will be used in the treatment of the Gum Springs Historic District as a NRHP-eligible property. As noted, this does not constitute a formal determination. The Determination of Effects report will include effects to Gum Springs that may result from the current undertaking. FTA and FCDOT agree with DHR’s recommendation of further research and evaluation of Gum Springs at the local level outside the Section 106 process for this undertaking.

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				Yet, the blessings of such a collective effort – reflecting dedicated support from governmental and nongovernmental entities – must not be allowed to overtake the sensitive nature of the work at hand.	
				Penn Daw Fire Station (A & A Rentals) “Level of Effort” pursuant to 36 CFR 800.4(b)(1); “Coordination with other reviews” pursuant to 36 CFR 800.3(b). Historical documentation provided by FTA to date concerning the original Penn Daw Fire Station, while adequate for a threshold determination – that the property is eligible for the National Register – is nonetheless minimal. Yet, it has been stated by project officials that it would be either (1) demolished; (2) adversely affected; or (3) be “less affected” than originally proposed. Suggestions I have made for augmenting FTA’s knowledge about the property’s history and significance have not been followed up on, despite my concern that the individual who is most knowledgeable is elderly and may not wish to come forward on her own. However, the “Notes” record of the meeting of September 4, 2019, states that FTA plans to conduct a Section 4(f) study to “consider feasible and prudent alternatives” to the property’s demolition. Is this study still being planned? If so, what level of historical documentation of the Penn Daw Fire Station will be required to evaluate its potential loss by demolition, or loss of integrity by “lesser effects”?	The historic context prepared by FTA and FCDOT provided sufficient evaluation to determine that A&A Rentals (DHR No. 029-6432) is eligible for listing in the NRHP. No additional research is required at this time for this undertaking. The resource was evaluated as part of the Architectural Management Summary (April 2019). DHR concurred with this finding via letter dated June 3, 2019. As discussed at the CP meeting on April 16, 2020, the project will be moving forward with a design that will avoid right-of-way acquisition at A&A Rentals and will likely result in a finding of no adverse effect. In accordance with Section 106, FTA shall apply the criteria of adverse effect to historic properties within the APE as part of the Determination of Effects and will consult with all parties. Should an adverse effect to historic properties be found, the FTA and the FCDOT will work with DHR, consulting parties, and the public to reach a resolution. The Section 106 effects assessment will inform appropriate Section 4(f) evaluation measures.
				Woodlawn Community House “Level of Effort” pursuant to 36 CFR 800.4(b)(1). At the meeting of September 4, 2019, I raised the concern that a proposed BRT station could potentially cause effects to the site of the Woodlawn Community House, a property built by Woodlawn Quaker and Woodlawn Baptist trustees in 1922 and demolished by Fort Belvoir sometime after its acquisition by the U. S. Army. Aerial photographs taken in 1937 show the existence of a structure on the Community House Lot at that time (prior to its acquisition and construction of Gray’s Hill Village nearby). The “Notes” record of the meeting states, “A community house and the headquarters of the Mt. Vernon Community Agricultural Fair may have once stood at this location [of proposed site of a BRT Station “located on the side of Belvoir Road”]; the project team will review this information.” However, the documentation submitted does not include any reference to this potential archaeological site that would indicate it has been, or will be, investigated.	The location in question was included in the Archaeological Assessment (April 2019). In June 2019, DHR concurred with the archaeological probability model for unsurveyed areas and the recommended Phase I survey of nine survey areas included in the Archaeological Assessment. The location in question was not recommended for additional archaeological survey as part of the current undertaking because it had been the subject of several past surveys. This area was subject to Phase I archaeological survey as part of several large-scale archaeological surveys of Fort Belvoir (1984 and 1993) and was more recently surveyed as part of the Phase I Archaeological Survey of Route 1 (2012). No archaeological site has been identified at this location after multiple archaeological investigations.
Fairfax County Department of Planning and Development	5/21/2020	Email with pdf	Yes	<p>Gum Springs: Staff continues to request that Gum Springs be evaluated as a Traditional Cultural Property using the National Register Bulletin #38, Guidelines for Evaluating and Documenting Cultural Properties, published by the National Park Service. This was not completed in the HASTR Addendum dated November 2019 nor in the second HASTR Addendum dated April 2020. As described in FCDOT’s letter to the Virginia Department of Historic resources (VDHR) regarding the Summary of Section 106 Activities, additional research was completed. However, it is staff’s position that these efforts were insufficient to evaluate Gum Springs as a Traditional Cultural Property. Staff disagrees with the recommendation that the Gum Springs Historic District is not eligible for the NR. All comments related to Gum Springs from our previous letter dated December 9, 2019 remain. An excerpt from that letter is included in Attachment 1.</p> <p>As discussed during the consulting parties meeting on April 16, 2020, VDHR is planning to work with consulting parties to determine an adequate method to reevaluate the eligibility of Gum Springs as a Traditional Cultural Property.</p>	Gum Spring's potential significance as a TCP, in consideration of National Register Bulletin 38 “Guidelines for Evaluating and Documenting Traditional Cultural Properties,” was addressed previously, as a response to similar comments, as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. As discussed in previous responses in the current document, the topic of TCPs was discussed with DHR following the last consulting party meeting. DHR responded that they do “not currently have any guidance documents, survey guidelines or means of evaluated NRHP eligibility in reference to TCPs. At this time, evaluating TCPs is outside the scope of which DHR can offer technical assistance and therefore, it is not reasonable to direct FTA to conduct a process outside of that which we can offer guidance. However, we recognize the importance of this historic community and continue to recommend this for further study and we can lend support to that which is in our purview. It should be noted that DHR staff reached out to the ACHP via email on April 20, 2020, for any case studies, white papers, etc., that could help provide a methodological approach for surveying and assessing African-American related TCPs for NRHP eligibility. On April 22, 2020, the ACHP informed us that they are not aware of any such documents.” Therefore, given the limitations on pursuing TCP investigations, FTA is treating the property as eligible for listing in the NRHP for the purposes of this undertaking and is formally

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				Staff supports this approach before a final determination of eligibility for Gum Springs is made by the FTA.	submitting their assumptions to DHR regarding the significance, criteria of eligibility and contributing properties within the APE that will be used in the evaluation of effects. FTA and FCDOT agree with DHR’s recommendation that further research and evaluation of Gum Springs be pursued at the local level outside the Section 106 process for this undertaking.
				<p>Walsh Hall/Old Groveton Schoolhouse – In response to the recently identified background information presented by the History Commission’s Section 106 Comments for the Richmond Highway BRT letter dated May 15, 2020 (Attachment 1), staff now requests that additional consideration be given to the History Commission’s recommendation of NR eligibility for the Walsh Hall/Old Groveton Schoolhouse. The most recent HASTR submission shows only the St. Louis Catholic Church and School building as eligible for listing in the NR. Previous submissions (April 2019) noted that Walsh Hall/Old Groveton Schoolhouse is ineligible.</p> <p>While Walsh Hall/Old Groveton Schoolhouse is not on the county Inventory of Historic Sites nor within a historic overlay district, there is considerable evidence of its importance to the Route 1 corridor and community. The building, constructed in 1888, was first used a school. It was moved to its current location in 1925, after it was purchased by the St. Louis Catholic Church parish and used to hold services in prior to the construction of the current main worship building.</p> <p>As proposed, the current APE and limits of clearing and grading for the proposed alignment of the Route 1 BRT project would bisect the Walsh Hall/Old Groveton Schoolhouse, which would require its removal or relocation.</p>	<p>St. Louis Catholic Church and School (DHR No. 029-5149), including Walsh Hall, was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. Walsh Hall is located within the boundary for the St. Louis Catholic Church and School (DHR No. 029-5149); however, the ca. 1876 former school building, converted to chapel, was recommended not NRHP eligible as part of the Historic Architectural Survey (April 2019). DHR staff concurred with this finding via letter dated June 3, 2019. Following the consulting party meeting held on September 4, 2019, FTA and FCDOT reviewed the V-CRIS documentation for the resource and followed-up with DHR via email (September 2019) to make sure all relevant historical information had been clearly presented and that no additional clarification was needed regarding the eligibility of Walsh Hall. The comment submitted by the Fairfax County History Commission on May 15, 2020 provides similar historical information that was included in the V-CRIS documentation in September 2019. While the additional historic context helps in understanding the significance of the resource as both a school and church, its potential for listing in the NRHP is severely limited as a result of Criteria Consideration A (Religious Properties) and B (Moved Properties). As noted in the evaluation and accompanying V-CRIS documentation, the building has significance as an early schoolhouse, but no longer conveys this significance as a result of being moved and undergoing extensive renovations. Further, while the building is certainly important to the congregation, it does not appear to have secular or architectural significance that would qualify it for listing in the NRHP.</p> <p>Walsh Hall does not meet NRHP Criteria Consideration A: Religious Properties. As considered under NRHP Criterion A, a religious property must be “significant under a theme in the history of religion having secular scholarly recognition; or significant under another historical theme such as exploration, settlement, social philanthropy, or education; or significantly associated with traditional cultural values” (NPS 1990). Walsh Hall does not appear to have significance as considered under NRHP Criterion A since a “religious property cannot be eligible simply because it was the place of religious services for a community, or was the oldest structure used by a religious group in a local area” (NPS 1990). As considered under NRHP Criterion C, the building does not embody distinctive characteristics of type, period, or method of construction, nor does it possess high artistic value or represent the work of a master.</p> <p>Walsh Hall does not meet NRHP Criteria Consideration B: Moved Properties. As considered under NRHP Criterion A, a moved property “must be demonstrated to be the surviving property most importantly associated with a particular event” (NPS 1990). In this case, the resource is associated with public education in Fairfax County and Virginia. As noted by the History Commission, Walsh Hall is the only surviving one-room public school within the Route 1 corridor; however, others exist within Fairfax County and throughout Virginia that better convey this significance. The building does not appear to meet the requirements of being the single surviving example most importantly associated with the event. As considered under NRHP Criterion C, a moved property “must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association” (NPS 1990). Additions and alterations have severely diminished the architectural integrity of the building as a schoolhouse.</p>
				Wells Fargo Bank- 8770 Richmond Highway Staff requests additional research be conducted regarding the building located at 8770 Richmond Highway. This request was not made in previous comments. However, the May 14, 2020,	Wells Fargo (DHR No. 029-6156) was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. The resource was evaluated and concurred not eligible for listing in the NRHP by DHR staff in November

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				Historical Society of Fairfax County, Virginia Section 106 Comments for the Richmond Highway BRT letter provided additional information about the architectural significance of this building. This building is an example of a well-known architectural trend in which defining features of George Washington’s Mount Vernon estate were included in inns and residences. The proposed Route 1 BRT project may have physical and visual impacts on the building. The new BRT station on Rt.1 and the realignment of Sacramento Drive will modify the setting of the building and may negatively impact its historical integrity.	2016. As such, it was not resurveyed or reevaluated as part of the Historic Architectural Survey (April 2019). As noted in the V-CRIS documentation “This building is not a significant example of the Colonial Revival style and has lost integrity of design through modifications for its current commercial use.” As noted in the Historical Society’s comment, the form and stylistic elements of Mount Vernon have had broad and long-lasting influence, particularly in terms of later Colonial Revival-style architecture. Similar residential and commercial examples are not uncommon locally or statewide. Additionally, as noted in the V-CRIS documentation the building has lost integrity as a result of modifications, both exterior and interior. At this time, the information provided does not appear to merit further evaluation of the resource’s eligibility for listing in the NRHP.
				Analysis of Properties within the APE expansion: Staff agrees with the determination of the FTA that none of the additional 25 properties within the expanded APE are recommended eligible for the National Register.	FTA and FCDOT acknowledge that the 25 newly identified resources (DHR No. 029-6596 to 029-6620) are not eligible for the NRHP.
				Staff agrees with the recommendation that the Jefferson Manor Subdivision is not eligible for the National Register.	FTA and FCDOT acknowledge that Jefferson Manor (DHR No. 029 6349) is not eligible for the NRHP.
				National Register of Historic Places Sites: Any site listed on or eligible for the National Register of Historic Places should be preserved and avoided. Of note, Woodlawn Plantation is identified as a National Historic Landmark, is nationally recognized and, as such, should receive the highest level of protection. Any physical or visual impact on listed or eligible sites should be avoided or minimized.	Questions regarding FTA’s forthcoming determination of effects were addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CP on April 7, 2020. In accordance with Section 106, FTA shall apply the criteria of adverse effect to historic properties within the APE as part of the forthcoming Effects Assessment document and consult with all parties. Should an adverse effect to historic properties be found, the FTA and the FCDOT will work with DHR, consulting parties, and the public to reach a resolution. Pursuant to 36 CFR 800.10, additional consideration for Woodlawn Plantation NHL has been made to minimize, to the maximum extent possible, the potential for adverse effects. The minimal roadway widening that will occur in this area will take place along the south side of Richmond Highway, away from the NHL boundary. Further, the proposed BRT will operate within the newly-constructed median of the existing transportation corridor in this area. It is anticipated that there will be no direct or indirect adverse effects to the NHL portion of Woodlawn Plantation.
				National Register Eligibility: Staff agrees with the two recommendations of National Register eligibility determined in the April 23, 2019, FTA/FCDOT Survey for the Penn Daw Fire Station and the St. Louis Catholic Church and School.	FTA and FCDOT acknowledge that A&A Rentals (DHR No. 029-6432) and St. Louis Catholic Church and School (DHR No. 029-5149) are eligible for the NRHP.
				Architectural Review Board Review: According to Section 7-200 of the Zoning Ordinance, the Fairfax County Architectural Review Board is required to be consulted for any physical or visual impact from the proposed project in historic overlay districts.	The Section 106 role of the Fairfax County Architectural Review Board was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. As a Certified Local Government (CLG) and consulting party for the project, the Fairfax County Department of Planning and Development has been provided all project documents and given the opportunity to comment regarding the identification of historic properties and will continue to be consulted regarding the assessment of effects (36 CFR 800.5) when completed. The Architectural Review Board falls under the purview of the Department of Planning and Development. We welcome comment from this group and will give them meaningful consideration, particularly as they relate to local heritage resources listed or eligible for listing in the NRHP; however, we request comments be coordinated through the Department of Planning and Development as the County’s representative. We also ask that comments generally be limited to those pertaining to the Section 106 process. Should the project require applicable local rezoning, special exceptions, or building and demolition permits, the Architectural Review Board shall be provided an application per Section 7-204 of the Zoning Ordinance.
				Fairfax County History Commission Review: The Fairfax County History Commission should be consulted for any physical or visual impact from the	The Section 106 role of the Fairfax County History Commission was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. As a CLG and consulting party for the project, the Fairfax County Department of

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				proposed project in or adjacent to properties listed on the Inventory of Historic Sites.	Planning and Development has been provided all project documents and given the opportunity to comment regarding the identification of historic properties and will continue to be consulted regarding the assessment of effects (36 CFR 800.5) when completed. The Fairfax County History Commission and Architectural Review Board fall under the purview of the Department of Planning and Development. We welcome comments from both groups and will give them meaningful consideration, particularly as they relate to local heritage resources listed or eligible for listing in the NRHP; however, we request comments be coordinated through the Department of Planning and Development as the County’s representative. We also ask that comments generally be limited to those pertaining to the Section 106 process. Should the project require applicable changes to land use planning and zoning, the History Commission shall be provided an opportunity to comment in accordance with Fairfax County procedures.
				Archaeological impacts: The Archeological Collections Branch of the Fairfax County Park Authority should be consulted for the ground disturbance of any property within or proximate to the APE.	The Section 106 role of the Fairfax County Park Authority was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. The Fairfax County Park Authority is a consulting party to the project. Staff will be consulted regarding all archeological survey and potential ground disturbance within the project’s APE.
				Architectural Survey: Staff reiterates the request for a hard copy of the research report from the Architectural Survey completed by Rummel, Klepper & Kahl on October 29, 2018.	Digital copies of all project materials including survey reports have been provided. Hard-copy versions will be provided to the Department of Planning and Development to include in the County’s records. Given the ongoing work to prepare addendums, the intent has been to provide all hard-copy identification reports to the Department of Planning and Development at the same time.
Fairfax County History Commission	5/14/2020	Memo submitted as appendix to DPD letter	No	<p>Based on our review of the documents provided to us for this project, we disagree with the FTA’s determination that Gum Springs is not eligible for the NRHP. We support the position of the Heritage Resources staff of the Fairfax County Department of Planning and Development requesting that Gum Springs be evaluated as a TCP under National Register Bulletin #38, Guidelines for Evaluating and Documenting Cultural Properties. We cannot find evidence that such an investigation was done before reaching the preliminary conclusion that Gum Springs is ineligible.</p> <p>For almost two centuries, Gum Springs has been recognized as a significant historically black community in Fairfax County. This critical fact is acknowledged by the Fairfax County Department of Transportation (FCDOT) in its recent addendum report, starting with the acknowledgment that West Ford, Gum Springs’ founder before the Civil War, was a freed slave of the Washington family at Mount Vernon, who continued to work at Mount Vernon throughout his life, as foreman of the house servants and guard of the Washington tomb. It also acknowledged the existence today of community buildings, churches, parks, schools, and the Pride of Fairfax Lodge. FCDOT even acknowledges that “Today, Gum Springs remains a fiercely independent, historically African American neighborhood that has persevered for over 180 years...”</p> <p>Additionally, the Virginia Department of Historic Resources (VDHR) commented that it did not have enough information on Gum Springs to evaluate whether it met the National Register Criteria (36 CFR Part 60) as a TCP, and consequently it indicated that the FTA had not fulfilled its Identification and Evaluation responsibilities under the regulations. DHR also noted that the consulting parties’ comments need to be fully addressed and additional information provided to it before a decision on eligibility for Gum Springs could be made.</p>	Gum Spring's potential significance as a TCP, in consideration of National Register Bulletin 38 “Guidelines for Evaluating and Documenting Traditional Cultural Properties,” was addressed previously, as a response to similar comments in the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020 and is further discussed in other comments in this document. The topic was discussed with DHR following the last consulting party meeting. DHR responded that they do “not currently have any guidance documents, survey guidelines or means of evaluated NRHP eligibility in reference to TCPs. At this time, evaluating TCPs is outside the scope of which DHR can offer technical assistance and therefore, it is not reasonable to direct FTA to conduct a process outside of that which we can offer guidance. However, we recognize the importance of this historic community and continue to recommend this for further study and we can lend support to that which is in our purview. It should be noted that DHR staff reached out to the ACHP via email on April 20, 2020, for any case studies, white papers, etc., that could help provide a methodological approach for surveying and assessing African-American related TCPs for NRHP eligibility. On April 22, 2020, the ACHP informed us that they are not aware of any such documents.” Therefore, given the limitations on pursuing TCP investigations, FTA is treating the property as eligible for listing in the NRHP for the purposes of this undertaking and is formally submitting to DHR their assumptions regarding the significance, criteria of eligibility and contributing properties within the APE that will be used in the evaluation of effects. FTA and FCDOT agree with DHR’s recommendation that further research and evaluation of Gum Springs be pursued at the local level outside the Section 106 process for this undertaking.

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				Based on our reading of National Register Bulletin #38 and 36 CFR 800.4, we believe that it is more than likely that Gum Springs is eligible for the National Register.	
				Based on our review of the reports, documents, and consulting party submissions, we are concerned that at least parts of 36 CFR 800.4(c)(2) and 36 CFR 800.3(b) have not been followed as carefully as they should have during this phase of the Sec. 106 process. 36 CFR 800.4(c)(2) – Determine whether a property is eligible, may not have been fully followed. Based on our review, we are not sure how the conclusion was reached since we find little evidence to support the claim. As one expert consulting party noted with respect to Gum Springs: “Any determination should take into consideration factors in the community’s potential eligibility such as the long-term survival of cultural traditions, established during its beginnings as a free African America community nearly two centuries ago.”	The historic context prepared by FTA and FCDOT was guided by DHR’s <i>Guidelines for Conducting Historic Resources Survey in Virginia</i> (DHR 2017). While not intended to serve as a comprehensive history of the community, research methods employed were similar to those that have been developed for similar properties. The intent of the historic context is to provide sufficient historical information to place the resource within appropriate local, statewide, and national contexts, and to allow a meaningful application of the NRHP criteria as described in the National Park Service’s <i>National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation</i> (NPS 1990). As stated in the NRHP evaluation for the resource, a clear association under Criterion A (associated with events that have made a significant contribution to the broad patterns of our history) exists; however, the built environment did not convey the significance adequately to be determined eligible for listing in the NRHP. In lieu of continuing research beyond our limitations, and as noted in previous responses in the current document, FTA will be treating Gum Springs as an eligible property for the purposes of this project and has further discussed the process with DHR. FTA and FCDOT are submitting to DHR assumptions of criteria of eligibility and contributing properties within the APE for use in evaluating the effects of the undertaking on Gum Springs. FTA and FCDOT agree with DHR’s recommendation for further research and evaluation of Gum Springs at the local level outside the Section 106 process for this undertaking.
				CFR 800.3(b) does not appear to have been fully followed. It states: (b) Coordinate with other reviews. The agency official should coordinate the steps of the section 106 process, as appropriate, with the overall planning schedule for the undertaking and with any reviews required under other authorities such as the National Environmental Policy Act, the Native American Graves Protection and Repatriation Act, the American Indian Religious Freedom Act, the Archeological Resources Protection Act and agency-specific legislation, such as section 4(f) of the Department of Transportation Act. With respect to compliance with the requirements of NEPA, FCDOT “in coordination with FTA” has stated its intention to invoke the provision for Categorical Exclusion (CE) from preparation of an Environmental Assessment for the BRT project. We note that FTA rules allow Categorical Exclusions for multimodal projects for both FTA and FHWA. However, guidance issued by the Council on Environmental Quality (CEQ) clearly states that a CE does not negate the need to meet Environmental Justice standards: In circumstances in which an EIS or EA will not be prepared and a disproportionately high and adverse human health or environmental impact on low-income populations, minority populations, or Indian tribes may exist, agencies should augment their procedures as appropriate to ensure that the otherwise applicable process or procedure for a federal action addresses environmental justice concerns. Agencies should ensure that the goals for public participation outlined in this guidance are satisfied to the fullest extent possible. Agencies also should fully develop and consider alternatives to the proposed action whenever possible, as would be required by NEPA. Based on our review, the Commission believes that more work is required before ruling on the status of Gum Springs. Since Gum Springs is a significant historically black community, we believe that FTA should develop a	FTA will fulfill its obligations under NEPA and other associated environmental laws and regulations. FTA and FCDOT continue to coordinate Section 106 as dictated by 36 CFR 800.

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				transparent plan that is compliant with all parts of 36 CFR 800 and includes public and consulting party involvement.	
				<p>We disagree with the determination that Walsh Hall (Formerly Groveton School) within the boundary of Saint Louis Catholic Church is NRHP ineligible. This building is historically significant due to its origin in 1888 as one of the first schools in the Mount Vernon District of Fairfax County. In addition, it played a significant role in the early growth of two churches in Virginia. From 1888 to 1902, the Groveton Mission, led by Virginia Theological Seminary students operated out of the building. From this start, the Groveton Mission grew into St. Mark’s Episcopal Church, which still serves the Groveton community. In 1925, Father Louis Smet of St. Mary’s Parish in Alexandria directed the purchase of the Groveton school house for use as a Catholic Mission. From 1925 to 1967, the building served as the Chapel for what would grow to become the Saint Louis Parish.</p> <p>We urge you to reexamine the eligibility of this building. We acknowledge that the Groveton school was indeed moved slightly from its original location, but the move in itself was historic. In 1925, Mr. L.A. Popkins, a local farmer, with the aid of a team of horses, rotated and moved the building to its present location which is very near to the original school site marked on G.M. Hopkins’ 1879 map of the area. On the other point of eligibility, it is correct that the building has been modified since its 1888 construction and use, but these modifications served the later historic contributions in the growth of the church.</p> <p>Finally, of the 100+ one-room public schools of Fairfax County that operated from 1870 to 1948, seven were located in the Route 1 corridor. This is the only one remaining. FCPS and public school divisions throughout the Commonwealth are celebrating their 150th anniversaries this year. This building is a vital part of the history of public education in the Commonwealth and Fairfax County. It should be determined NRHP eligible.</p>	<p>St. Louis Catholic Church and School (DHR No. 029-5149), including Walsh Hall, was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. Walsh Hall is located within the boundary for the St. Louis Catholic Church and School (DHR No. 029-5149); however, the former ca. 1876 school building, converted to chapel, was recommended not NRHP eligible as part of the <i>Historic Architectural Survey</i> (April 2019). DHR staff concurred with this finding via letter dated June 3, 2019. Following the consulting party meeting held on September 4, 2019, FTA and FCDOT reviewed the V-CRIS documentation for the resource and followed-up with DHR via email (September 2019) to make sure all relevant historical information had been clearly presented and that no additional clarification was needed regarding the eligibility of Walsh Hall. The comment submitted by the Fairfax County History Commission on May 15, 2020 provides similar historical information that was included in the V-CRIS documentation in September 2019. While the additional historic context helps in understanding the significance of the resource as both a school and church, its potential for listing in the NRHP is severely limited as a result of Criteria Consideration A (Religious Properties) and B (Moved Properties). As noted in the evaluation and accompanying V-CRIS documentation, the building has significance as an early schoolhouse, but no longer conveys this significance as a result of being moved and undergoing extensive renovations. Further, while the building is certainly important to the congregation, it does not appear to have secular or architectural significance that would qualify it for listing in the NRHP.</p> <p>As considered under NRHP Criterion A, a religious property must be “significant under a theme in the history of religion having secular scholarly recognition; or significant under another historical theme such as exploration, settlement, social philanthropy, or education; or significantly associated with traditional cultural values” (NPS 1990). Walsh Hall does not appear to have significance as considered under Criterion A since a “religious property cannot be eligible simply because it was the place of religious services for a community, or was the oldest structure used by a religious group in a local area” (NPS 1990). As considered under NRHP Criterion C, the building does not embody distinctive characteristics of type, period, or method of construction, nor does it possess high artistic value or represent the work of a master.</p> <p>Walsh Hall does not meet NRHP Criteria Consideration B: Moved Properties. As considered under NRHP Criterion A, a moved property “must be demonstrated to be the surviving property most importantly associated with a particular event” (NPS 1990). In this case, the resource is associated with public education in Fairfax County and Virginia. As noted by the History Commission, Walsh Hall is the only surviving one-room public school within the Route 1 corridor; however, others exist within Fairfax County and throughout Virginia that better convey this significance. The building does not appear to meet the requirements of being the single surviving example most importantly associated with the event. Further, the building’s ability to convey this significance is severely diminished as a result of its conversion to a chapel and subsequent additions and renovations. As considered under NRHP Criterion C, a moved property “must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association” (NPS 1990). Additions and alterations have severely diminished the architectural integrity of the building as a schoolhouse.</p>
Historical Society of Fairfax County	5/14/2020	Letter submitted as appendix to DPD letter	Yes (as of receipt of this letter)	I would like to express our appreciation for inviting the Historical Society of Fairfax County in 2018 as a consulting party to the Richmond Highway Bus Rapid Transit Project. I apologize for belatedly accepting the invitation. Back in 2018 our society was largely dormant and in the midst of a leadership	FTA and FCDOT acknowledge acceptance of our invitation to be a consulting party to the project and will continue to include the Historical Society throughout the process.

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				change. We were just made aware of having been invited as a Section 106 consulting party to this project and the society would appreciate being included for the duration of the process.	
				The society disagrees with the determination that Gum Springs (DHR No. 029-6581) is NRHP ineligible. We respectfully request that you reconsider and reexamine the eligibility. The society supports the position of the Heritage Resources staff of the Fairfax County Department of Planning and Development requesting that Gum Springs be evaluated as a TCP under National Register Bulletin #38, Guidelines for Evaluating and Documenting Cultural Properties. Gum Springs is vitally significant to Fairfax County’s history as it is our oldest black community. Its connection to West Ford alone is noteworthy. Having been established as a refuge for freedmen and runaway slaves in 1833, the community provided sanctuary for African Americans through the period of slavery, segregation, and beyond. Support from Gum Springs’ founding families, neighbors, churches, and schools ensured that this vitally important community has survived throughout history.	Gum Spring's potential significance as a TCP, in consideration of National Register Bulletin 38 “Guidelines for Evaluating and Documenting Traditional Cultural Properties,” was addressed previously, as a response to similar comments in the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020, and further detail is provided in other comments in this document. The topic was discussed with DHR following the last consulting party meeting. DHR responded that they do “not currently have any guidance documents, survey guidelines or means of evaluated NRHP eligibility in reference to TCPs. At this time, evaluating TCPs is outside the scope of which DHR can offer technical assistance and therefore, it is not reasonable to direct FTA to conduct a process outside of that which we can offer guidance. However, we recognize the importance of this historic community and continue to recommend this for further study and we can lend support to that which is in our purview. It should be noted that DHR staff reached out to the ACHP via email on April 20, 2020, for any case studies, white papers, etc., that could help provide a methodological approach for surveying and assessing African-American related TCPs for NRHP eligibility. On April 22, 2020, the ACHP informed us that they are not aware of any such documents.” Therefore, given the limitations on pursuing TCP investigations, FTA is treating the property as eligible for listing in the NRHP for the purposes of this undertaking and is formally submitting to DHR their assumptions regarding the significance, criteria of eligibility and contributing properties within the APE that will be used in the evaluation of effects. FTA and FCDOT agree with DHR’s recommendation that further research and evaluation of Gum Springs be pursued at the local level outside the Section 106 process for this undertaking.
				The society disagrees with the determination that Walsh Hall (the former Groveton School) is NRHP ineligible. We respectfully request that you reconsider and reexamine the eligibility. Despite the building having been moved and slightly modified over the years, the structure is significant for its role in the development of public education in Fairfax County. It was one of the first schools in the Mount Vernon School District when completed in 1888 and it is now the last surviving original one-room schoolhouse in the Route One corridor. In addition to its vital role in public education, the building holds the distinction of birthing two early churches in the community: St. Mark’s Episcopal Church and St. Louis Catholic Church.	St. Louis Catholic Church and School (DHR No. 029-5149), including Walsh Hall, was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. Walsh Hall is located within the boundary for the St. Louis Catholic Church and School (DHR No. 029-5149); however, the former ca. 1876 school building, converted to chapel, was recommended not NRHP eligible as part of the Historic Architectural Survey (April 2019). DHR staff concurred with this finding via letter dated June 3, 2019. Following the consulting party meeting held on September 4, 2019, FTA and FCDOT reviewed the V-CRIS documentation for the resource and followed-up with DHR via email (September 2019) to make sure all relevant historical information had been clearly presented and that no additional clarification was needed regarding the eligibility of Walsh Hall. The comment submitted by the Fairfax County History Commission on May 15, 2020 provides similar historical information that was included in the V-CRIS documentation in September 2019. While the additional historic context helps in understanding the significance of the resource as both a school and church, its potential for listing in the NRHP is severely limited as a result of Criteria Consideration A (Religious Properties) and B (Moved Properties). As noted in the evaluation and accompanying V-CRIS documentation, the building has significance as an early schoolhouse, but no longer conveys this significance as a result of being moved and undergoing extensive renovations. Further, while the building is certainly important to the congregation, it does not appear to have secular or architectural significance that would qualify it for listing in the NRHP. Walsh Hall does not meet NRHP Criteria Consideration A: Religious Properties. As considered under NRHP Criterion A, a religious property must be “significant under a theme in the history of religion having secular scholarly recognition; or significant under another historical theme such as exploration, settlement, social philanthropy, or education; or significantly associated with traditional cultural values” (NPS 1990). Walsh Hall does not appear to have significance as considered under Criterion A since a “religious property cannot be eligible

COMMENT SUMMARY

Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
					<p>simply because it was the place of religious services for a community, or was the oldest structure used by a religious group in a local area” (NPS 1990). As considered under NRHP Criterion C, the building does not embody distinctive characteristics of type, period, or method of construction, nor does it possess high artistic value or represent the work of a master.</p> <p>Walsh Hall does not meet NRHP Criteria Consideration B: Moved Properties. As considered under NRHP Criterion A, a moved property “must be demonstrated to be the surviving property most importantly associated with a particular event” (NPS 1990). In this case, the resource is associated with public education in Fairfax County and Virginia. As noted by the Historical Society, Walsh Hall is the only surviving one-room public school within the Route 1 corridor; however, others exist within Fairfax County and throughout Virginia that better convey this significance. The building does not appear to meet the requirements of being the single surviving example most importantly associated with the event. Further, the building’s ability to convey this significance is severely diminished as a result of its conversion to a chapel and subsequent additions and renovations. As considered under NRHP Criterion C, a moved property “must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association” (NPS 1990). Additions and alterations have severely diminished the architectural integrity of the building as a schoolhouse.</p>
				<p>The society disagrees with the determination that the Wells Fargo Bank at 8770 Richmond Highway (DHR No. 029-6156) is NRHP ineligible. We respectfully request that you reconsider and reexamine the eligibility. It was originally an eighteen-room house built on a working farm in 1941 by Walter Clem. He embraced the Mount Vernon copy-cat architectural movement for his residence, a style which has been prevalent in the United States for over 200 years. The building is significant because it is a solid 20th Century Mount Vernon replica and it is a visual landmark on Richmond Highway and to the community.</p> <p>According to long-time residents who recall seeing a plaque in the building prior to a 1980s interior renovation, it is rumored to have a connection to the Works Progress Administration (WPA). This connection should be investigated further. After Walter Clem died in the house in 1953, his widow, Florence Clem, converted it into a tourist home known as The Colonial Inn. In 1964, newly founded Woodlawn National Bank converted the building into its first banking office which has remained in use as such for almost fifty years. Woodlawn National Bank eventually grew to have four branches and financially served and supported the development of the Route One corridor until merging with Clarendon Bank & Trust in 1973.</p> <p>The building was initially selected by Woodlawn National Bank to be repurposed because the Mount Vernon image was immediately recognizable and for its association with George Washington. The Washington Evening Star reported on January 10, 1964, that “not many bank offices look like this” making it the only bank of its kind in Fairfax County and likely in Virginia. What is remarkable about this landmark is that after an eighty-year period of being used as a residence, a boarding house, and a bank, it continues to retain its integrity.</p>	<p>Wells Fargo (DHR No. 029-6156) was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CPs on April 7, 2020. The resource was evaluated and concurred not eligible for listing in the NRHP by DHR staff in November 2016. As such, it was not resurveyed or reevaluated as part of the Historic Architectural Survey (April 2019). As noted in the V-CRIS documentation, “This building is not a significant example of the Colonial Revival style and has lost integrity of design through modifications for its current commercial use.” As noted in the Historical Society’s comment, the form and stylistic elements of Mount Vernon have had broad and long-lasting influence, particularly in terms of later Colonial Revival-style architecture. Similar residential and commercial examples are not uncommon locally or statewide. Additionally, as noted in the V-CRIS documentation the building has lost integrity as a result of modifications, both exterior and interior. At this time, the information provided does not appear to merit further evaluation of the resource’s eligibility for listing in the NRHP.</p>
				<p>The society disagrees with the determination that the Wells Fargo Bank at 6300 Richmond Highway (DHR No. 029-6445) is NRHP ineligible. We respectfully request that you reconsider and reexamine the eligibility.</p>	<p>6300 Richmond Highway (DHR No. 029-6445) was addressed previously as part of the Section 106 Coordination Summary that was provided to DHR and all CP on April 7, 2020. The resource was surveyed and evaluated as part of the Historic Architectural Survey (April 2019). The former motor court office has undergone extensive alterations and additions to</p>

COMMENT SUMMARY

Commenter; Organization	Date Received	Submittal Format	Invited CP (Yes/No)	Comment	Response
				<p>We would also like to point out that although 6300 Richmond Highway (DHR No. 029-6445) has been deemed ineligible and is indeed largely altered from its original purpose, this building is also vital to the history of the Route One corridor. In 1927, Samuel Cooper Dawson Sr. partnered with Edward Monroe Pennell to build a modern highway hotel at the intersection of Route One and King’s Highway. They combined the first syllables of their last names and called it the Penn-Daw Hotel.</p> <p>The building has since been converted into a Wells Fargo bank however, this was the original main building of the motor hotel which is responsible for giving the Penn Daw community its name. The distinctive position of the main building at this intersection was frequently documented in photo postcards and maps throughout its operation until closing in 1973 after nearly a half-century of serving Route One travelers. It is the last surviving structure of the Penn Daw district’s founding namesake. We believe because of this association the structure should not be so easily dismissed.</p>	<p>accommodate its current use as a bank. It no longer retains sufficient integrity of design, materials, workmanship, feeling, and association to convey significance. DHR staff concurred with this finding via letter dated June 3, 2019. In August 2019, additional information regarding its historic function as the Penn-Daw Hotel was appended to the V-CRIS documentation to supplement the historic context based on consulting party comments. While the additional information regarding the building’s original use as the Penn-Daw Hotel certainly provides a better understanding of the resource’s potential significance, it no longer retains sufficient architectural integrity to convey this significance.</p>



The Historical Society of Fairfax County, Virginia

P.O. Box 415, Fairfax, Virginia 22030

Mr. Daniel Koenig
U.S. Department of Transportation
Federal Transit Administration
Washington, DC Metropolitan Office
1990 K St NW, Suite 510
Washington, DC 20006

September 10, 2020

Subject: Historical Society of Fairfax County Section 106 Comments for the August 13, 2020 Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia Documentation

Dear Mr. Koenig,

The Historical Society of Fairfax County appreciates the responses to our comments in our May 14, 2020 letter and for the opportunity to review the August 13, 2020 project documents.

The Historical Society disagrees with the assessment that the Wells Fargo Bank at 8770 Richmond Highway (DHR No. 029-6156) has lost its integrity of design through modifications for its current commercial use. We believe it is eligible for NHR consideration and that this resource has been too easily dismissed.

We agree that the stylistic elements of Mount Vernon are seen in similar residential and commercial examples both locally and nationally. However, this resource is a more complete example of Mount Vernon which includes the massing, twin chimneys, cornice and dormer windows. The building's representation of this national symbol has been a visual landmark on Richmond Highway for nearly eighty years.

Currently there is an initiative to get this building listed on the Fairfax County Inventory of Historic Sites. Originally known as The Colonial Home and constructed in 1941, this structure is likely the last original intact tourist home still standing in the Route One corridor of Fairfax County. During the process of researching for the Inventory nomination, original photographs of The Colonial Home have been located which shows how minimal the exterior modifications have been over the last eight decades.

The Historical Society would like clarification if the proposed Sacramento Drive realignment will adversely affect this structure and if protective measures will be considered to prevent damage to the building.

Thank you once again for providing us with the opportunity to comment.

Sincerely,

Chris Barbuschak

Chris Barbuschak

President, Historical Society of Fairfax County



Colonial Home, c. 1940s



Wells Fargo Bank, May 2020



Fairfax County History Commission

10360 North Street
Fairfax, Virginia 22030-2514
fairfaxcounty.gov/history-commission/



September 10, 2020

Leanna O'Donnell
Fairfax County Department of Planning and Development
Leanna.O'Donnell@fairfaxcounty.gov

Re: Fairfax County History Commission Section 106 Comment for the Proposed Federal Transit Authority Project for the Richmond Highway Bus Rapid Transit, Fairfax County, Virginia

Thank you for providing the opportunity to review and comment on the most recent Section 106 package for the Richmond Highway Bus Rapid Transit (BRT) Project. The Fairfax County History Commission has reviewed the materials and discussed them in the virtual meeting structure necessitated by COVID-19. The comments of the Commission reflect continued concern on three issues:

1. The assessment of Effects for Gum Springs (DHR No. 029-6581)
2. The eligibility of Walsh Hall (Formerly Groveton School), within the boundary of Saint Louis Catholic Church (DHR No. 029-5149), for the NRHP
3. The eligibility of Wells Fargo Bank (DHR No. 029-6156) at 8770 Richmond Highway

I. ASSESSMENT OF EFFECTS FOR THE GUM SPRINGS HISTORIC DISTRICT (DHR-NO. 029-6581)

A. EVALUATION AS A TRADITIONAL CULTURAL PROPERTY (TCP)

We concur with the Federal Transit Administration's decision to treat the Gum Springs Historic District as eligible for listing in the National Register of Historic Places (NRHP) and Virginia Landmarks Register (VLR). We believe that the District should additionally be considered eligible for the National Register **as a Traditional Cultural Property (TCP)** under National Register Bulletin #38, *Guidelines for Evaluating and Documenting Cultural Properties*. As it ultimately is the responsibility of the FTA to identify and evaluate potential historic properties, the DHR's stated reluctance to weigh in does not allow the FTA to abrogate this responsibility.

B. EFFECTS TO ST. JOHN BAPTIST CHURCH/WOODLAWN METHODIST CHURCH (DHR-NO. 029-6045)

The History Commission requests clarification of the comments on this property. They state that “there are no visual, atmospheric or audible effects with the potential to diminish the integrity of the property’s significant features anticipated in this area.” The maps included with the comments are dated May 2020. The roll plots currently on the Fairfax County website however, indicate “Potential Noise Walls” between the widened Route 1 and Gum Springs. It is unclear whether the determination “no effect” was made with or without the assumption of the noise walls. We respectfully request more information on this issue and the process of determining “no effect” to the property.

Additionally, the History Commission disagrees with the labeling and characterization of St John Baptist/Woodlawn Methodist Church in the comments. We believe that the label “Former Woodlawn Methodist Church” is incorrect. Our understanding is that Woodlawn Methodist Church continues to own the property and use it as a satellite campus of their current facility at 7100 Harrison Lane. Woodlawn continues to operate a monthly community food-sharing program at the Gum Springs location. This fact and the continued maintenance of the Historic Woodlawn Cemetery on the original, 19th century church site on Fort Belvoir shows that the statement of impact of Woodlawn Methodist church is too limited. The report indicates that the church “played a central role for worship, social and community life in Gum Springs from the 1940’s to the 1960’s.” The Woodlawn congregation, some of them descendants of the church’s founders, continue to be active, contributing members of the Gum Springs community and the surrounding area.

II. ELIGIBILITY OF WALSH HALL (FORMERLY GROVETON SCHOOL AND GROVETON MISSION, EPISCOPAL CHURCH)

We disagree with the determination that Walsh Hall (Formerly Groveton School) within the boundary of Saint Louis Catholic Church is NRHP ineligible. We have issues tied to the three separate significances of the building.

A. GROVETON SCHOOLHOUSE

We request that this historic building, constructed in 1888, be considered for an exception to the “moved criteria” based on the fact that the move was slight, and primarily a reorientation accomplished in 1929. The building sits virtually in the same position on the property seen on the G.M. Hopkins’ 1879 map of the area. Photographs and writings over the years support the position of the school next to the road that developed into Richmond Highway.

B. GROVETON MISSION, EPISCOPAL CHURCH

It is our position that the building’s usage from 1888-1902 meets the NRHP Criteria because it was part of the settlement of the Groveton community and growth of not only St. Mark’s Episcopal Church in the area, but also the larger Episcopal church based around the Virginia

Theological Seminary. The attached Seminary Bulletin shows that Groveton was part of constellation of 9 missions across the area that were led or supported by Seminary students.

“The nine mission chapels are on the periphery of a rough semi-circle of which the Seminary is the hub, the ends of the semi-circle sighting the Potomac.”

An additional pattern of this development is that schoolhouses were often used in the initial formation of missions. We believe that additional research at the Virginia Theological Seminary will support the Groveton Mission’s role in the settlement of the area and early growth of the Episcopal Church in Northern Virginia.

C. GROVETON MISSION/WALSH HALL, CATHOLIC CHURCH

Conversations with the Office of Planning, Construction and Facilities of the Catholic Diocese of Arlington show that they are interested in more thoroughly documenting the history of Walsh Hall, preserving the building and perhaps restoring it where possible. We believe that this research may uncover more thoroughly how Walsh Hall contributes to the NRHP eligible Saint Louis Catholic Church property and fits into the larger history of the Catholic Church in the area. The possibility that the building could be moved from its original location as a Catholic Mission would harm those efforts.

II. ELIGIBILITY OF WELLS FARGO, FORMERLY COLONIAL HOME TOURIST HOME, (DHR NO. 029-6156)

While the History Commission did not comment on this property in our last submission, we have been notified that a nomination of the Wells Fargo Bank/Colonial Home for the Fairfax County Inventory of Historic Sites is being drafted. Already in this process, new information has been uncovered which we believe warrants a re-evaluation of the site.

The building was constructed in 1941 as a replica of George Washington’s Mount Vernon Estate nearby. It is not only an example of the Colonial Revival Style, as indicated in the comments, but stands as an example of the trend to replicate Mount Vernon’s distinctive architecture. The construction of the Colonial Home in 1941 is an illustration of the trend that peaked following the 200th anniversary celebration of George Washington’s Birth in 1932. This anniversary was, of course, very present in the minds of residents and tourists as the George Washington Memorial Parkway was completed in conjunction with that celebration. Lydia Mattice Brandt, author of First in the Homes of His Countrymen: George Washington’s Mount Vernon in the American Imagination and expert on these structures evaluated the Wells Fargo Bank and has deemed it “an excellent example of a replica of George Washington’s Mount Vernon plantation house.” She further comments on its value to say,

“While other replicas nearby and across the country most often replicate only Mount Vernon’s piazza, this more complete example approximates the iconic house’s massing, twin chimneys, cornice, and dormer windows.”

In light of new evidence, the History Commission disagrees with the assessment that exterior modifications have made this property ineligible for NRHP consideration. Early photos have emerged that show that the most publicly visible portions of the building are virtually unchanged. The most marked difference in the photos is the reduced land in the front of the building, lost to previous efforts to widen Route 1. As we await the full nomination package, we believe there is already enough information to warrant a reevaluation of this property.

In summary, the History Commission believes that these issues warrant reexamination. We appreciate the opportunity to review and comment on the project as it proceeds.

Respectfully,

A handwritten signature in cursive script, reading "Anne Stuntz". The signature is written in dark ink and is positioned to the left of the typed name and title.

Anne Stuntz,
Chairman

Fairfax County History Commission

Enclosed:

Hopkins Atlas, Mount Vernon, 1878

Hopkins Atlas, Excerpt Groveton School House on Hunting Creek Turnpike (aka Route 1) at Snake Hill

Seminary Bulletin, Courtesy St. Luke's Episcopal Church

Colonial Home – Early front view, Courtesy P. Kleysteuber

Colonial Home – Early view from left, Courtesy P. Kleysteuber

ACCOTINK P.O.

Res. P.H. Troth

Sch. Ho. M.E.Ch.

Geo. H. Troth

P.H. Troth

Geo. Dove

P.H. Troth

Geo. Dove

W. Mason

S. Tolson

Taylor

Grist & Saw Mill

E. Grimsley

Early Green

S. Way

Store & P.O.

Res. Store

№ 3.

Fairfax Co.

Scale 1½ Inches to a Mile



Note: The figures on the Roads show the Distance in Rods from junctions thereof.

Entered according to act of Congress in the year 1878 by G. M. Hopkins in the Office of the Librarian of Congress at Washington



Y. Owen Kerby

A.W. Harrison
"HUNTLEY"

Shelton, Est.
Y. Owen Kerby & Mrs.

"CLIFTON"
Co. Kemper

Mrs. Munch

Jno. Shuster
Sch. Ho.

Jno. Simpson
"MT. HYBLA"

Wm. Helmsley

Chas. Ballanger

Res. Matilda Gray

Accotink

Jno. Thompson

O'Neil

Tho. Javins

Res. Tho. F. Ball

Deny. Barton
"CITY VIEW"

Ann. Johnson
J. Regan
Alb. Stowell

Co. Mason

Jno. S. Jno.

Kate Johns

Turnpike

Geo. M. Burney
Porter Smith
GUM SPRING

Much could be said about the personnel of the mission staffs, and the faithful and loyal work of the students, but to mention names would involve one almost in a roster of the student body. About fifty students are engaged in some phase of this practical work and with few exceptions they are interested and faithful. In accordance with ancient tradition each mission has a staff of students, averaging five, the one in charge being called the "Bishop." Over this "House of Bishops" is a "Presiding Bishop" who is responsible for the executive supervision. The activity and interest in mission work at the present time is largely due to the energy and leadership of this body of "Bishops," particularly the "Presiding Bishop." The mission stations rise and fall with the efficiency of their "Bishops" even more than is true in normal parish work.

The nine mission Chapels are on the periphery of a rough semi-circle of which the Seminary is the hub, the ends of the semi-circle sighting the Potomac. *Trinity, Arlington*, is at the northern extreme, a well-built stucco Chapel and parish house almost under the great naval radio towers and in the midst of a thriving section which is really a suburb of Washington. Many government workers live here, and the region is growing, so there is prospect that the mission may some day become an independent parish. *St. John's, Glencarlyn*, has something of the same characteristics, though the little white church stands nearer real country. These two missions are the most stable financially. *St. Paul's, Bailey's Cross Roads*, continues its steady course through the years, with a group of faithful communicants and a good Church School. *St. Paul's Lincolnia* has its ups and downs, the section being overchurched and subject to periodic fervors by such bodies as the Holy Rollers. For a year and a half work there has been hopeless and the chapel was closed, but this spring the field has had a most surprising reawakening. Weekly services are being held and there is a Church School of some twenty-five children. *All Saints', Sharon*, standing atop a hill in the rolling countryside, has had a fine year under an acute staff. The chapel has been repainted inside in a rich color scheme, the altar refurnished, a new organ secured, and the choir vested and carefully trained. This is an outward manifestation of renewed inner life and interest.

Bending our semi-circle inward to Alexandria suburbs, we strike *St. John's Chapel, West End*, which works among very poor people and has had a chequered history. Two years ago it survived only as a small Church School, but this year has had a rebirth and now gives promise of becoming an active mission. It is interesting to note that the Episcopal High School Missionary Society made it possible this year for the mission to install a much-needed furnace. On another

edge of the city stands the very active *Chapel of the Good Shepherd, Tunneltown*, really a mission of St. Paul's Church but run by Seminary students. The work done here among the underprivileged of this poor section has been outstanding. Recently a Preaching Mission was held in which the little church was jammed for four nights in succession and thirty persons rededicated their lives at the close. In Alexandria work is also done at the Children's Home, and other students have been active in the Red Cross and relief and social service work. *Christ Church, Groveton*, directly on the Richmond Road, is in the midst of a section where road houses, gasoline stations and hot-dog stands have produced the usual effect on a normally quiet countryside. The work here is difficult and progress is slow.

And finally at the other end of our semi-circle, near the new Mt. Vernon Boulevard along the Potomac, stands the newest and one of the most promising of the Seminary missions—"Snowden." For seven years work has been carried on under most trying conditions, in a country schoolhouse. The teacher's desk becomes a Holy Table, the people squeeze into the little desk seats. But regular services have been maintained and a Church School of 75 built up. Last year a building fund was started, and this year, through the generosity of a wealthy neighbor, the fund was sufficiently large to justify a start. So at the present time a little brick Colonial Chapel, to seat 125, is being erected on a fine site near the Boulevard. It is hoped that it will be complete by Commencement and that the consecration can take place on the afternoon of June 4, the Chapel to be known as *St. Luke's*.

JAMES A. MITCHELL.

As I recall
he was the Prof. at the
Va. Seminary in charge
of the Seminary missions. The
above must have been
written O/a 1933
E. Blumery







County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

September 13, 2020

Daniel Koenig, Environmental Protection Specialist
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

**SUBJECT: Fairfax County Heritage Resources Comment for August 13, 2020
Submission for the Identification of Historic Properties, Richmond Highway Bus
Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722**

Mr. Koenig:

Thank you for providing the opportunity to review the following Richmond Highway BRT Project documents received on August 13, 2020:

1. Letter to Virginia Department of Historic Resources dated August 13, 2020
2. Gum Springs Significance Statement and Effects Assessment Memorandum dated June 1, 2020
3. Comment Summary Matrix dated August 12, 2020
4. Updated notes and materials from the April 16, 2020 Consulting Party Meeting

Please see the information provided below by Fairfax County Department of Planning and Development (DPD) - Heritage Resources staff (staff) in response to your request for review. Comments provided by the Fairfax County History Commission are included as Attachment 1. No comments from the Fairfax County Architectural Review Board were received in regard to this submission.

Staff provided preliminary comments to the Federal Transit Administration (FTA) via the Fairfax County Department of Transportation (FCDOT) regarding the October 4, 2018, Area of Potential Effects on December 26, 2018; comments from both the Architectural Review Board and the Fairfax County History Commission were sent in a subsequent email on March 22, 2019. Both sets of comments were in response to the Section 106 project initiation and the proposed Area of Potential Effects (APE) letter sent out by the FTA on October 4, 2018.

Staff also provided responses to the Historic Architectural Survey Technical Report and its addendum in comments response letters dated May 31, 2019, and December 9, 2019. Further staff provided comments to the April 7, 2020, submission on the updates to these reports with a comment response letter dated May 21, 2020.



PLANNING & DEVELOPMENT

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Gum Springs Significance Statement and Effects Assessment Memorandum
August 2020 Submission Updates

Since the April 7, 2020, submission, the FTA and FCDOT decided to treat the Gum Springs Historic District as eligible to the National Register of Historic Places (NRHP) for the purpose of this undertaking as recommended by the Virginia Department of Historic Resources (VDHR) in its May 8, 2020, letter. Gum Springs is not a county regulated historic overlay district; the Gum Springs Historic District boundary is defined as an area for historic consideration and survey as determined by FTA/FCDOT during the Section 106 process (outline in purple in Figure 1). Further, the FTA consulted with VDHR on analyzing the Gum Springs Historic District as a Traditional Cultural Property; however, VDHR does not currently have any guidance documents to inform this type of analysis, and FTA/FCDOT stated that it is not reasonable to assess Gum Springs Historic District as a Traditional Cultural Property without formal guidance to follow.

FTA/FCDOT have also provided the *Gum Springs Significance Statement and Effects Assessment Memorandum* to support assumptions of criteria of eligibility and contributing properties within the APE. This memorandum does not constitute as a formal finding of eligibility and further research is recommended. This document states that the Gum Springs Historic District (as defined by VDHR No. 029-6581) is being treated eligible under Criterion A of the NRHP for its association with the African American community. FTA/FCDOT has outlined the period of significance from 1833 to 1973 and has identified a total of six properties in the Gum Springs Historic District that are also within the APE (see Figure 1). They suggest that three properties are contributing, including the St. John Baptist Church, the Spring Garden Apartments, and 7712 Fordson Road, and also suggest that three additional properties within the APE would be non-contributing, including 7929 Richmond Highway, 7925 Richmond Highway, and 7901 Richmond Highway.

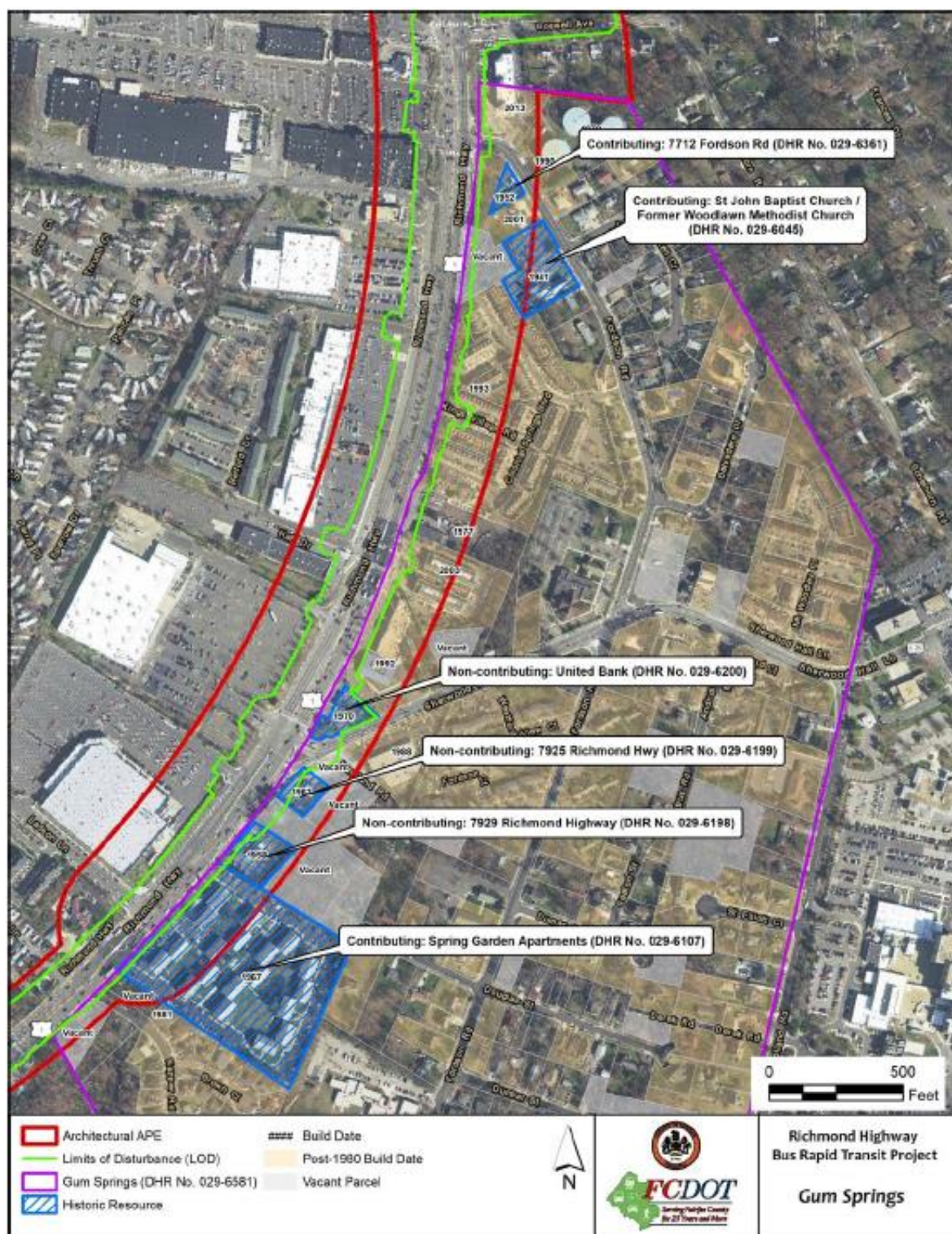


Figure 1- Map from FCDOT document page 4, Gum Springs Historic District

Staff Recommendations

1. Gum Springs- Staff believes it is premature for FTA/FCDOT to make determinations on which buildings are contributing and non-contributing to a potential Gum Springs Historic District. The significance of Gum Springs would inform potential boundaries of any district, the period of significance and which buildings should be contributing and non-contributing. Therefore, without a formal determination of eligibility for the National Register of Historic Places, each property within the FTA/FCDOT defined Gum Springs Historic District should be treated as contributing until further determination is made. If impacts occur to properties within the FTA/FCDOT identified Gum Springs Historic District, FTA/FCDOT should consult with the SHPO and other consulting parties as to whether or not they constitute an adverse effect. This would include all the properties, contributing or non-contributing, as identified above.

Walsh Hall/Old Groveton Schoolhouse – Staff requests further information regarding the eligibility of the building. Under Criterion A, the comment matrix states that the building must have significance other than being part of a religious organization. Staff would maintain that the building does have significance under education as it was formerly used as a schoolhouse and was a major part of the community.

Staff also requests that FTA /FCDOT provide further information to support the suggestion that there are other well preserved one-room schoolhouses in Fairfax County.

In addition, staff continues to request further information about the revised limits of clearing and grading and the impact of them on the building. In the previous submission, the current APE and limits of clearing and grading for the proposed alignment of the Route 1 BRT project would have bisected the Walsh Hall/Old Groveton Schoolhouse (Figure 2-building circled in red), which would require its removal or relocation. With the revised submission received on August 13, 2020, the limits of clearing and grading have been modified to be closer to the Route 1 right of way (Figure 3- building circled in red). From the revised limits of clearing and grading it appears that the historic Walsh Hall/Old Groveton Schoolhouse would now be preserved in place. Staff requests more detailed information to ensure there is only a minimal impact on the building.

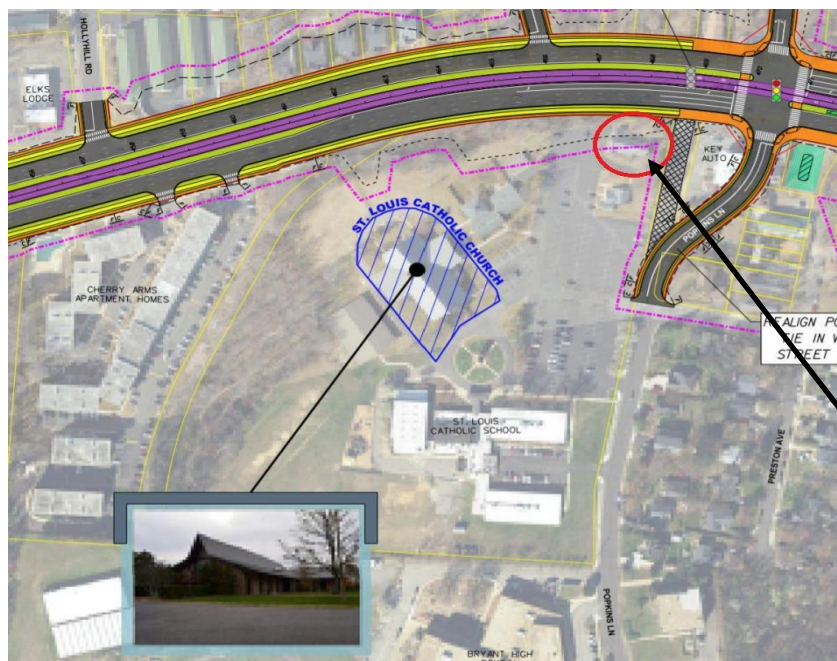


Figure 2- Inset of Richmond Highway Bus Rapid Transit Study- Sheet No.4 September 2019

**Old Groveton
Schoolhouse**

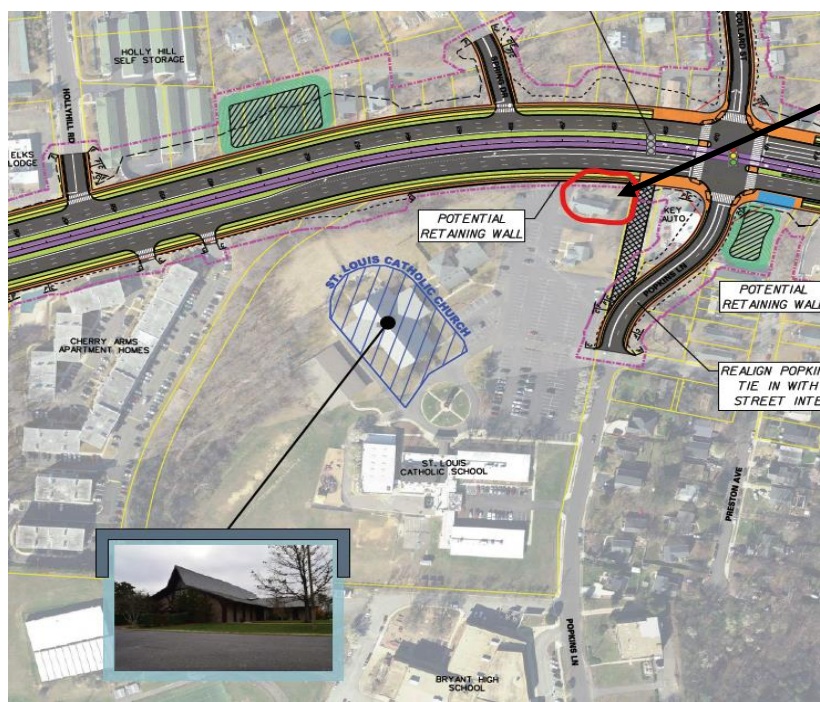


Figure 3- Inset of Richmond Highway Bus Rapid Transit Study- Sheet No.4 August 2020.

2. Wells Fargo Bank- 8770 Richmond Highway - Staff continues to request additional research be conducted into the eligibility of the building located at 8770 Richmond Highway. Staff does not agree that this building has lost integrity of design as cited by FTA/FCDOT in the comment response matrix dated August 12, 2020. This building is an example of a well-known architectural trend in which defining features of George Washington's Mount Vernon estate were included in inns to attract potential customers as well as in homes and banks.

This building was constructed in 1941 originally as a home, then became an inn and now today is used as a bank. This specific building exemplifies the architecture of the Mount Vernon through its massing, twin chimneys, cornice, and dormer windows, in addition to the iconic piazza. Other examples of buildings that replicated Mount Vernon features across the country usually only included the piazza as a homage to Mount Vernon. Extensive research by a History Commission member and staff at the Virginia Room have provided photo evidence that the exterior of this building has remained intact, although the color has changed. From pictorial research evidence, many of these defining features still exist on the building today (see figures 4,5, and 6 below).



Figure 4- The Colonial Home Postcard-c.1940; Photo used with permission.



Figure 5- Woodlawn National Bank, Mount Vernon High School Surveyor Yearbook, 1969; Photo used with permission.



Figure 6- The Colonial Home, northwest and southwest exterior, May 24, 2020; Photo used with permission.

The proposed Route 1 BRT project may have physical and visual impacts on the building. The new BRT station on Rt.1 will encroach into the street frontage of the building and the realignment of Sacramento Drive will modify the northern part of the property which will impact setting of the building and may negatively impact its historical integrity (Figure 4). Staff agrees that the physical landscape surrounding the building has already been modified beyond historic recognition. Therefore, it is of the utmost importance to ensure adequate protection measures are in place to prevent any further damage to the building.

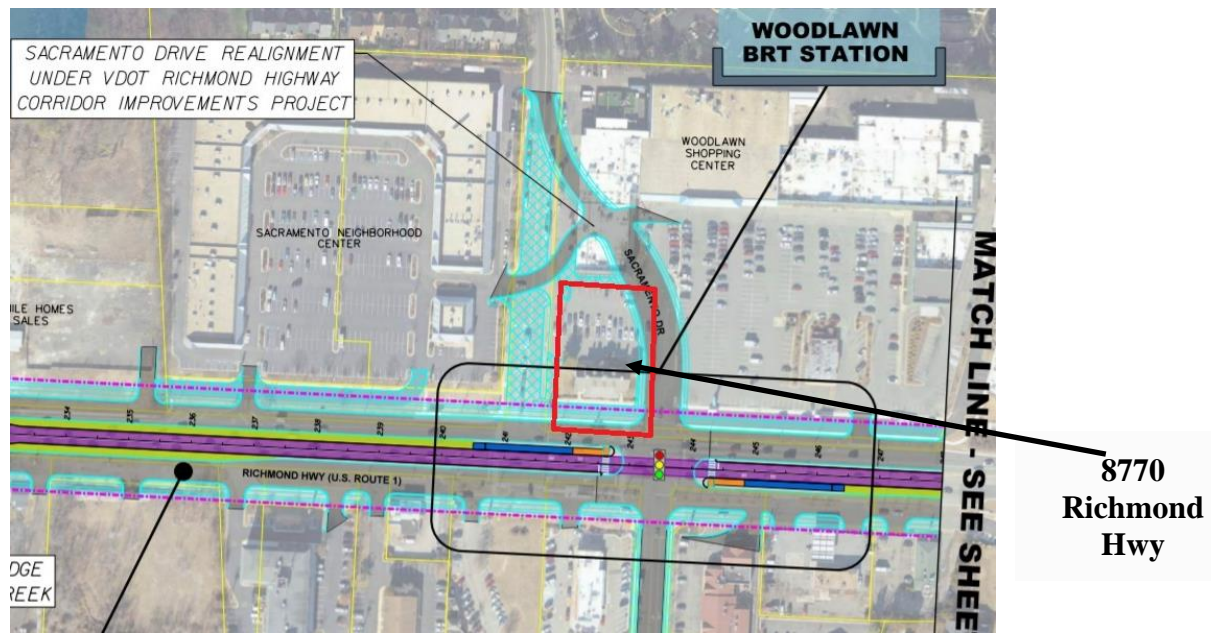


Figure 7- Inset of Richmond Highway Bus Rapid Transit Study- Sheet No.1 September 2019

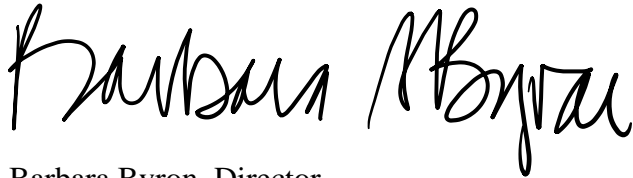
Additional Comments from Previous Submissions

1. National Register of Historic Places Sites: Any site listed on, or eligible for, the National Register of Historic Places should be preserved and avoided. Of note, Woodlawn Plantation is identified as a National Historic Landmark, is nationally recognized and, as such, should receive the highest level of protection. Any physical or visual impact on listed or eligible sites should be avoided or minimized.
2. National Register Eligibility: Staff agrees with the two recommendations of National Register eligibility determined in the April 23, 2019, FTA/FCDOT Survey for the Penn Daw Fire Station and the St. Louis Catholic Church and School.

3. 3. Architectural Review Board Review: According to Section 7-200 of the Zoning Ordinance, the Fairfax County Architectural Review Board is required to be consulted for any physical or visual impact from the proposed project in historic overlay districts.
4. Fairfax County History Commission Review: The Fairfax County History Commission should be consulted for any physical or visual impact from the proposed project in or adjacent to properties listed on the Inventory of Historic Sites.
5. Archaeological impacts: The Archeological Collections Branch of the Fairfax County Park Authority should be consulted for the ground disturbance of any property within or proximate to the APE.

Thank you for providing us with the opportunity to comment. If you have any questions, please feel free to contact either Laura Arseneau laura.arseneau@fairfaxcounty.gov or Leanna O'Donnell leanna.o'donnell@fairfaxcounty.gov.

Sincerely,



Barbara Byron, Director
Fairfax County Department of Planning and Development

Attachment:

1. Fairfax County History Commission Comments dated September 10, 2020

cc: (Copies provided electronically by email)

Tom Biesiadny, Director, Fairfax County Dept. of Transportation
Vanessa Aguayo, Fairfax County Dept. of Transportation
Douglas Miller, Fairfax County. Dept. of Transportation
Leanna H. O'Donnell, Director, PD, DPD
Kim Penrod, Director of Cultural Resources, Delaware Nation
Christopher Landgraf, Director of Public Works, Dept. of the Army
Martha Catlin, Alexandria Monthly Meeting Religious Society of Friends
Elizabeth Crowell, Manager, Heritage Resources Division, FCPA
Ronald Chase, Director, Gum Springs Historical Society
Ross M. Bradford, Senior Associate General Counsel, NTHP
Adrienne Birge-Wilson, VDHR
Helen Ross, Regional Preservation Manager, VDOT

From: Birge-wilson, Adrienne

Sent: Monday, September 14, 2020 1:26 PM

To: Haas, Shauna (FTA)

Cc: Ross Bradford ; Erin Paden ; Byron, Barbara A. ; Ron Chase ; Chris Barbuschak ; Landgraf, Christopher Warren (Chris) CIV USARMY ID-SUSTAINMENT (US) ; Anissa Brown - VDOT ; Martha Catlin ; Crowell, Elizabeth A ; Aguayo, Vanessa ; Koenig, Daniel (FTA)

Subject: Re: Fairfax Co. Richmond Highway Bus Rapid Transit (RHBRT) - Section 106 continuing consultation and CP Responses

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Shauna- For the purposes of this Section 106 review, Gum Springs Historic District (DHR ID #029-6581) is being treated as eligible for listing in the National Register of Historic Places and the Virginia Landmarks Register under Criterion A for its association with the African-American community in Fairfax County.

Additionally, the period of significance will be establishment in 1833 to 1973 (when President Richard Nixon declared a moratorium on housing and community development assistance programs financed through the U.S. Department of Housing and Urban Development).

Within the current undertaking's APE, there are a total of three contributing resources (DHR ID #s 029-6045, 029-6107, and 029-6361) and three non-contributing resources (DHR ID #s. 029-6198, 029-6199, and 029-6200).

Based on the documented information on Gum Springs and sum of the Section 106 consultation thus far, DHR concurs that the FTA's proposed assumptions regarding eligibility are appropriate for the purposes of this review and we concur with the resources identified within the APE. We do not have any additional comments.

V/R,

Adrienne Birge-Wilson

Review and Compliance Division

Virginia Department of Historic Resources

2801 Kensington Avenue

Richmond, VA 23221

(804) 482-6092

*** COVID-19 Update: DHR is open for business and the majority of staff is teleworking. Our offices are temporarily closed to the public. ***

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U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1835 Market Street
Suite 1910
Philadelphia, PA 19103
215-656-7100

January 15, 2020

Ms. Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

**Re: Historic Architectural Effects Assessment Technical Report, Richmond Highway
Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722**

Dear Ms. Birge-Wilson:

The Fairfax County Department of Transportation (FCDOT) is supporting the Federal Transit Administration (FTA) with Section 106 consultation for the Richmond Highway Bus Rapid Transit Project. FCDOT, in coordination with FTA, is proposing to implement bus rapid transit (BRT) service along Richmond Highway/U.S. Route 1 and North Kings Highway/State Route 241 from US Army Garrison Fort Belvoir to the Huntington Metrorail Station. The project includes the construction of new BRT-dedicated median lanes; nine BRT stations; roadway widening; streetscape improvements; and accommodations for walkways, trails, and bicycle facilities. The project would operate in both dedicated and mixed traffic lanes within the project limits.

In April 2019, a historic architectural survey to identify historic properties that could potentially be affected by the undertaking was submitted to the Virginia Department of Historic Resources (DHR) and other Consulting Parties for review and comment. Historic properties are those properties listed or considered eligible for listing in the National Register of Historic Places (NRHP). In November 2019, an addendum report was prepared to address comments received from DHR and other Consulting Parties. A second addendum report was prepared in April 2020 to provide additional information related to Jefferson Manor (DHR No. 029-6349) and to incorporate recent design changes occurring at several intersections necessitating an updated historic architectural area of potential effects (APE). Comments from Consulting Parties were addressed in a Section 106 coordination document (April 2020).

In August 2020, FTA and FCDOT submitted consolidated findings on the identification of historic properties and assumptions for the treatment of the Gum Springs Historic District (DHR No. 029-6581) as a NRHP-eligible resource to DHR and other consulting parties. Additional materials submitted included updated meeting notes from the in-person meeting held on April 16, 2020 and a summary of consulting party comments from May 2020 with FTA and FCDOT responses. In an email dated September 15, 2020, DHR staff concurred with the consolidated findings on the identification of historic properties and the assumptions for the treatment of Gum Springs' eligibility.

At this time, FTA and FCDOT are providing the *Historic Architectural Effects Assessment Technical Report*, which provides an evaluation of effects to identified historic properties within

the APE. A total of nine historic properties (or properties being treated as historic) were identified for the project (listed from south to north):

Camp A. A. Humphreys Pump Station and Filter Building (DHR No. 029-0096)

Fort Belvoir Military Railroad Historic District (DHR No. 029-5724)

Woodlawn Plantation (DHR No. 029-0056)

Woodlawn Cultural Landscape Historic District (DHR No. 029-5181)

Original Mount Vernon High School (DHR No. 029-0230)

St. Louis Catholic Church and School (DHR No. 029-5149)

A&A Rentals (DHR No. 029-6432)

Fair Haven (DHR No. 029-6348)

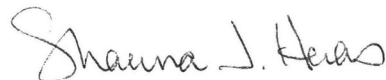
Gum Springs Historic District (DHR No. 029-6581).

The definition of effect and criteria of adverse effect were applied to each of the nine historic properties within the APE, which is further described in the enclosed report. FTA and FCDOT have determined the project would have **no effect** to the Camp A.A. Humphreys Pump Station and Filter Building (DHR No. 029-0096), Fort Belvoir Military Railroad Historic District (DHR No. 029-5724), and St. Louis Catholic Church and School (DHR No. 029-5149), and **no adverse effect** to Woodlawn Plantation (DHR No. 029-0056), Woodlawn Cultural Landscape Historic District (DHR No. 029-5181), Original Mount Vernon High School (DHR No. 029-0230), A&A Rentals (DHR No. 029-6432), Fair Haven Historic District (DHR No. 029-6348), and Gum Springs Historic District (DHR No. 029-6581).

Pursuant to Section 4(f) requirements of the U.S. Department of Transportation (USDOT) Act of 1966, as amended, FTA intends to make a finding of a *de minimis* Section 4(f) use of the Woodlawn Plantation, Woodlawn Cultural Landscape Historic District, and the Gum Springs Historic District.

FTA hereby submits our finding of No Adverse Effects for the Undertaking and requests DHR concurrence with these findings. This letter and enclosure are also being sent to consulting parties to provide them with an opportunity to review and comment on the effects of the project on historic properties. Please provide any comment or concurrence within 30 days of the date of this letter. If you have any questions, please contact Mr. Daniel Koenig at Daniel.Koenig@dot.gov, or myself at Shauna.Haas@dot.gov.

Sincerely,



Shauna J Haas,
Environmental Protection Specialist

Enclosure: Historic Architectural Effects Assessment Technical Report

cc: Douglas C. Miller, Fairfax County Department of Transportation
Vanessa Aguayo T., Fairfax County Department of Transportation
Erin Paden, Delaware Nation
Kenneth Bansah, Department of the Army (Fort Belvoir)
Barbara Byron, Fairfax County Government, Department of Planning and Development
Elizabeth Crowell, Fairfax County Park Authority
Ross Bradford, National Trust for Historic Preservation
Anissa Brown, Virginia Department of Transportation
Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends
Ronald Chase, Gum Springs Historical Society
Chris Barbuschak, Historical Society of Fairfax County

From: Ron Chase
Sent: Monday, February 15, 2021 7:29 PM
To: Koenig, Daniel (FTA) ; [Gum Springs Museum/Ron Chase](#)
Subject: [Comments: Bus Rapid Transit Project](#)

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Comments:

Re: Historic Architectural Effects Assessment Technical Report, Richmond Highway
Bus Rapid Transit Project, Fairfax County, Virginia:
DHR Project No. 2018-0722

Submitted By:

Ronald Chase, President

Gum Springs Historical Society, Inc.
8100 Fordson Road
Alexandria(Gum Springs) Virginia 22306

1. 5.6 Description

Page 15

Gum Springs, a 214 acre Tract of Land. The northern boundary of Gum Springs is historically Boswell and Shallhorn..

The actuarial boundaries of Gum Springs are important in that it identifies the full acreage of land that West Ford,(a, black man) purchased in 1833,

Quantity of land and time of purchase reflects the uniqueness of a Northern Va black landowner in 1833

Historic Architectural Effects Assessment Technical Report.:The contributing resources Report state DHR No. 029-6045,,DHR No. 099-6361
DHR No. 029-6107 appears to be an error. Is(029-6197) the correct number? Do not fall with-in the 50 year criteria.

All of the stated contributing resources are over 50 years old.

DHR No. 029-6045 is 80 years old

DHR No. 099-6361 is 58 years old

DHR No. 029-6197 is 56 years old

5.62 Significance

Narrative is built around the marketing ploy that the Saunders B. Moon Community Action Association (A community action group created to develop community improvements) use to execute the development of affordable housing for sale.

The narrative miss represents the actual housing that was demolished.

90 percent of the homes that were demolished was in Joe Kings Bottom, the original area that was developed for black soldiers after World War ii. The area had fallen into disrepair and was closed when Spring Gardens Apartment opened.

The narrative gives the impression that it was 90 percent of all the homes in Gum Springs that were demolished.

The narrative does not reference the uniqueness of Gum Springs and what enabled the community to stay in the continuum. A community such as Gum Springs, the land , its people , its, institutions, all the living and dying action and elements that has been omitted in the narrative of African American life which with-in the American society.;

5.63 Effects Assessment

Page 22

Appendix B. Sheet 9

Appendix B. Sheet 8

Fordson Road Gum Springs BRT Station

Sherwood Hall Gum Springs BRT Station

Neither of these identifiers show enough of the area that is being empacked to make a determination as to how any negative impact is occurring.

Need to see the complet area. The actual intersections.



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Matt Strickler
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
www.dhr.virginia.gov

February 17, 2021

Ms. Shauna Haas
U.S. Department of Transportation
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

Re: Effects for the Fairfax County Richmond Highway Bus Rapid Transit (BRT) Program
Fairfax County, VA
DHR File No. 2018-0722

Dear Ms. Haas:

The Department of Historic Resources (DHR) received the Federal Transit Administration's (FTA) letter and accompanying *Historic Architectural Effects Assessment Technical Report – January 2021* (Report), on January 15, 2021, and received an email on February 11, 2021, informing us that the comment period had been extended to February 22, 2021.

The Report clarifies the scope of this undertaking, as there has been confusion previously in regards to what falls within the current undertaking's scope versus that of the Richmond Highway Corridor Improvements Project (DHR File #2001-0007). The Report clarifies the expanded APE (page 3 of the Report), effects assessment (page 14 of the Report) and effects specific to the following identified historic properties:

- Woodlawn Plantation (DHR #029-0056/029-5181-0001) and Woodlawn Cultural Landscape (DHR #029-5181) on pages 14 and 15 of the Report;
- Original Mount Vernon High School (DHR #029-0230) on page 18 of the Report; and
- Gum Springs Historic District (DHR #029-6581) on page 22 of the Report.

An Adverse Effect per 36 CFR800.5(a), "is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association."

The FTA and the Fairfax County Department of Transportation (FCDOT) have determined that the project would have no effect to the Camp A.A. Humphreys Pump Station and Filter Building (DHR #029-0096), Fort

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

Northern Region Office
5357 Main Street
PO Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

Eastern Region Office
2801 Kensington Avenue
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Belvoir Military Railroad Historic District (DHR #029-5724), and St. Louis Catholic Church and School (DHR # 029-5149), and *no adverse effect* to Woodlawn Plantation (DHR #029-0056), Woodlawn Cultural Landscape Historic District (DHR #029-5181), Original Mount Vernon High School (DHR #029-0230), A&A Rentals (DHR #029-6432), Fair Haven Historic District (DHR #029-6348), and Gum Springs Historic District (DHR #029-6581).

Based upon the documentation provided, DHR understands that the proposed Hybla Valley, South County Center and Gum Springs BRT stations will be built within the visual APE and viewshed of historic properties. The station designs are preliminary and it is anticipated that the platforms would generally be 140 feet in length and between 10 and 14 feet wide, with a refuge area consisting of a canopy, windscreen, and protective wall covering 70 feet. A noise wall will also potentially be built within the visual APE and viewshed of historic properties.

DHR concurs with the FTA's effect determinations for this project with the following conditions:

1. The designs for the Hybla Valley, South County Center, Gum Springs, and any other BRT stations that are within the established visual APE and within the viewshed of identified historic properties, be provided to DHR prior to finalization and construction; and
2. The noise wall design and location(s) that are within the established visual APE and within the viewshed of identified historic properties be provided to DHR prior to finalization and construction.

If for any reason the undertaking is not or cannot be conducted as proposed in the finding, consultation under Section 106 must be reopened. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me via email at adrienne.birge-wilson@dhr.virginia.gov or via telephone at (804)482-6092.

Sincerely,



Adrienne Birge-Wilson, Architectural Historian
Review and Compliance Division

cc: Dan Koenig, FTA
Douglas C. Miller, Fairfax County Department of Transportation
Vanessa Aguayo T., Fairfax County Department of Transportation
Erin Paden, Delaware Nation
Kenneth Bansah, Department of the Army (Fort Belvoir)
Barbara Byron, Fairfax County Government, Department of Planning and Development
Elizabeth Crowell, Fairfax County Park Authority
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Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends

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Ronald Chase, Gum Springs Historical Society
Chris Barbuschak, Historical Society of Fairfax County

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RICHMOND HIGHWAY BRT PROJECT Historic Architectural Effects Assessment Technical Report

Comments by Martha Claire Catlin, Historian, Alexandria Monthly Meeting of the Religious Society of Friends (Friends)

February 22, 2021

The following comments in response to the referenced Report are provided pursuant to the Federal Transit Authority (FTA) request for comments from Consulting Parties on its proposed federal undertaking, the Richmond Highway BRT Project. FTA has requested that the Virginia State Historic Preservation Office (SHPO) respond to the Report's recommendations regarding effects to historic properties and supporting documentation by letter of January 15, 2021 (Letter). Given that FTA has extended the comment period from February 15 to February 22, 2021, Friends request that FTA allow additional time for the Virginia SHPO to receive and consider comments from Consulting Parties before FTA requests the SHPO's comments on FTA's recommended determinations of effect as stated in the Letter and Report.

Woodlawn Cultural Landscape Historic District and Woodlawn Quaker Meetinghouse

Comment: The Report (Section 5.4) refers to the Woodlawn Cultural Landscape Historic District as a "National Register-eligible resource." However, the historic district is listed on the National Register of Historic Places. Further, the description of the historic district is incomplete, omitting the Woodlawn Quaker Meetinghouse and the historic African American Woodlawn Methodist Cemetery as components of the district.

The Report states:

While the undertaking may introduce new, construction-related, atmospheric and audible elements, these effects would be temporary in nature and would not diminish the integrity of setting, feeling, or association.

Comment: Temporary effects, until they cease, or are reversed, are nonetheless potentially harmful to Friends' ongoing use and access to the Woodlawn Quaker Meetinghouse, an individually listed National Register historic property. Such effects have the potential to isolate, or inhibit access to, the meetinghouse unless steps are taken to avoid, minimize or mitigate such effects, including potentially harmful indirect effects such as vandalism associated with unsecured construction site activity. Further, FTA should take into consideration that the Meetinghouse and Woodlawn Pope-Leighey House share an entrance drive (Woodlawn Road) that connects with Route One near the proposed construction location. Friends request to be included in ongoing consultation with FTA, along with our neighbors at Woodlawn Pope-Leighey, concerning all aspects of the proposed BRT undertaking that could in any way affect the area near the entrance drive or could otherwise affect the setting of the meetinghouse, including staging areas and other activities notwithstanding whether the effects of such activity may be deemed temporary.

Comment: Figure 5-2 of the Report does not show the historic African American Woodlawn Methodist Cemetery as a property included in the Woodlawn Cultural Landscape Historic

District. The depiction of the historic district is incomplete without the inclusion of this historic property, as documented in the historic district's National Register listing.

Comment: "Sheet 1" of Appendix B, "Conceptual Plan, September 2020" includes details for this project segment. However, the plan does not indicate the boundaries of the Area of Potential Effect. The plan incorrectly, and misleadingly, labels the Woodlawn Quaker Meetinghouse as within the boundaries shown for "Woodlawn Plantation."

Comment: "Sheet 1" of Appendix B, "Conceptual Plan, September 2020": Disclaimers state, "Preliminary Limit of Disturbance" and "Work in Progress: All aspects of the Design, including the Limit of Disturbance, Property Impacts, Stormwater Management Facilities, and Side Street Improvements are Preliminary and are Subject to Change." Given the close proximity of anticipated disturbance to the Woodlawn Road entrance to the Meetinghouse, as depicted on the Plan, it would appear that effects to the entrance (as described above) cannot be ruled out. As stated above, such effects would be harmful to Friends' ongoing use and access to the Woodlawn Quaker Meetinghouse.

Comment: While the representation of the Meetinghouse property on Sheet 1 of the Conceptual Plan is incorrect, no reference can be found to Woodlawn Quaker Meetinghouse in the text of Report, not even to clarify that it is a component of the Woodlawn Cultural Landscape Historic District. If the intention is for the BRT undertaking to (a) be subject to FTA's responsibility to meet the requirements of Section 106 of the National Historic Preservation Act to assess effects to historic properties, and (b) to evaluate effects only to certain components of the Woodlawn Cultural Landscape Historic District, the Report should state this clearly. Although the Report states it has evaluated the Historic District in its recommendation of "no adverse effect," the Area of Potential Effect, as delineated, includes only portions of the Historic District within the Woodlawn Pope-Leighey component of the Historic District. It remains unclear how FTA ruled out the potential for effects on other components of the Historic District, specifically the Meetinghouse, when the nature and character of the Historic District is as a collection of interrelated historic properties. Further, the proximity of the Meetinghouse and its setting to proposed construction indicates that the Area of Potential Effect would more properly include the Meetinghouse, regardless of the FTA's view on whether such potential effects would, or should, be of concern. Correct analysis of the nature and effects of the proposed BRT undertaking would depend on FTA's accurate assessment of the Area of Potential Effect.

Gum Springs Historic District

Comment: Statements in 5.6.3 "Effects Assessment" are self-contradictory. The judgment that certain named historic properties of the Gum Springs Historic District ["Church at 7730 Fordson Road (DHR No. 029-6045)" and "House at 7712 Fordson Road (DHR No. 029-6361)"] are not adversely affected appears to be based upon an interpretation of the National Register evaluative concept of "integrity" as not applicable to the two specified historic properties. This judgment appears, in turn, to be based upon denial that the properties exhibit architectural characteristics that would render them subject to visual effects, or upon a determination that any such architectural characteristics are unrelated, are not "significant features," and are therefore irrelevant, to the properties' eligibility for the National Register:

Visual, atmospheric, or audible effects with the potential to diminish the integrity of the property's significant features are not anticipated. Two of the contributing elements identified within the APE, Church at 7730 Fordson Road (DHR No. 029-6045) and House at 7712 Fordson Road (DHR No. 029-6361), are set back between 75 ft. and 200 ft. from the Richmond Highway/US Route 1 corridor. **Introduction of new visual features associated with the current undertaking, including construction of a new stormwater management pond within the district boundaries, would not diminish the integrity of location, setting, feeling, and association of the district or the two contributing resources within it because their significance is related to their presence in the community and their use, which would remain unchanged as a result of the undertaking.**

Comment: Such conclusions illogically suggest that the mere existence and use of the historic properties are the only attributes to be considered in determining the effects of the BRT project on these structures, and imply that only their existence and use qualify them for the National Register and would therefore be worthy of considering. The actual, physically expressed historic character of these buildings, notwithstanding their eligibility for the National Register, as acknowledged by FTA, is dismissed as nonexistent. The language FTA has depended on to justify a finding of "no adverse effect" appears to directly contradict the basis of its findings that the properties meet the criteria for listing in the National Register.

Comment: Statements describing the effects of introduction of BRT stations into the setting of the Gum Springs Historic District pose similar inconsistencies. A statement asserts that "existing conditions have previously diminished the setting and feeling of the immediate area." Yet, subsequent text in the Report concludes that the stations "would not diminish the property's [Gum Springs Historic District] integrity of setting, feeling, or association with the community." Has the character of the Gum Springs Historic District's Route One setting been evaluated? Has a conclusion been drawn that this segment of Route One's character has been diminished to the degree that it has no relevance to the Historic District? The historical record shows the Gum Springs farms of West Ford and his successors, and the community that developed within and around them, as having developed in relation to the roads, and that certain roads, such as the Accotink Turnpike, were intentionally constructed to relate locationally to the community. These were then, as now, roads that led to markets, to employment, to the Potomac River and its tributaries, and as both a "downtown" business center and a source of through-traffic automobiles that often brought customers to Gum Springs roadside businesses. While the character of the original farm roads evolved to reflect evolving commercial, residential, and transportation patterns, Gum Springs has always maintained a roadside orientation, including the pedestrian life that offers opportunity for social interaction. Moreover, Gum Springs community members could often be credited for entrepreneurial, religious, and other aspects of the evolving character of "the Highway" beyond its borders but accessible by its roads. While Route One throughout the BRT project's Area of Potential Effect has not been determined eligible for the National Register, it need not meet National Register criteria to provide a continuing, compatible context for many of the properties within that Area of Potential Effect, in particular, the Gum Springs Historic District, whose historical significance, as a traditional cultural place, is ongoing.

Would there be no observable contrast between the “before” and “after” conditions of BRT project construction? By asserting that Gum Springs’ relationship with Route One is merely “tied to its historic significance, and will remain unchanged as a result of the undertaking,” the Report’s assessment neglects to evaluate the foreseeable potential effects of the BRT project on the character of the setting of the historic district, or to provide any information about any analysis that may have led to the Report’s conclusion that the property’s setting would not be (further) diminished:

The proposed Hybla Valley and Gum Springs BRT stations could potentially introduce new visual features into the setting of the district, but **existing conditions have previously diminished the setting and feeling of the immediate area** as a result of recent large-scale commercial development and previous roadway widening. The introduction of new BRT stations within the roadway median **would not diminish the property’s integrity of setting, feeling, or association with the community**, nor will it change the use of the property or its contributing features. **The property’s location and association with the Richmond Highway/Route 1 corridor is tied to its historic significance, and will remain unchanged as a result of the undertaking.**

Comment: The Report’s evaluation of effects of the undertaking on the setting of the Gum Springs Historic District, as written, does not provide convincing information or analysis to support the Report’s conclusion that “The undertaking would have **no adverse effect** to the Gum Springs Historic District (DHR No. 029-6581) or any contributing elements located within the undertaking’s APE.”



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

February 22, 2021

Ms. Shauna J. Haas
1835 Market Street
Suite 1910
Philadelphia, PA 19103

Re: Section 106 and Section 4(f) Project Effect Determination Letter Dated January 15, 2021 & Historic Architectural Effects Assessment Technical Report (January 2021), Richmond Highway Bus Rapid Transit Project, DHR Project No. 2018-0722

Dear Ms. Haas:

The National Trust for Historic Preservation appreciates the opportunity to comment on your January 15, 2021 Project Effect Determination Letter for the Richmond Highway Bus Rapid Transit Project (the “BRT Project”) and the January 2021 Effects Assessment Technical Report (the “Assessment Report”). The National Trust generally supports the BRT Project and your efforts to identify and address its impact on Woodlawn Plantation (“Woodlawn”) and the Woodlawn Cultural Landscape Historic District (the “Historic District”); however, given that the BRT Project bisects the Historic District continued consultation is necessary to ensure that impacts remain minimized or avoided in final design plans and construction specifications.

Accordingly, this letter is a formal objection to the Project Effect Determinations for the BRT Project provided in your January 15, 2021 correspondence. This objection to the determinations of adverse effects triggers the regulatory requirement for the FTA to consult further with the National Trust to reach a resolution. See 36 C.F.R. § 800.5(c)(2)(i). This letter briefly summarizes the National Trust’s concerns.

Route 1 Project and the BRT Project

The National Trust was closely involved in the Section 106 process for the Richmond Highway Improvements Project (DHR File No. 2001-0007) (the “Route 1 Project”). The Federal Highway Administration (“FHWA”) and the Virginia Department of Historic Resources (“SHPO”) determined that the Route 1 Project met the criteria for protection under Section 4(f) and would be “used” by the build alternatives and would have adverse effects on the Woodlawn National Historic Landmark (029-0056), the Woodlawn Historic District (029-5181), and the Sharpe Stable Complex (029-5181-0005). Section I.b. of the Programmatic Agreement for the Route 1 Project states that:

In an effort to minimize the adverse effects of the Undertaking on the Woodlawn Historic District, consistent with Section 4(f) of the Department of Transportation Act, NEPA and NHPA, to enhance the experience of visiting and traveling through the Woodlawn Historic District, and to provide a safer environment for motorists, pedestrians, and cyclists, FHWA, VDOT, and the County shall work together, in

consultation with the SHPO, the Trust and other parties to this Agreement, to reduce the width of the right-of-way and roadway section to the maximum extent possible through the Woodlawn Historic District.

The National Trust, FHWA, SHPO, the Virginia Department of Transportation (“VDOT”) and other parties to the Programmatic Agreement spent significant time and effort to comply with the requirements of Section 4(f) for the Route 1 Project. These efforts included narrowing travel lanes and seeking design exceptions for the roadway while also incorporating accommodations for future transit enhancements, such as bus rapid transit lanes within the right of way for the Route 1 Project and specifically within the planned median along Route 1 and at the intersection of Route 1 and Mount Vernon Highway.

The product of the design and review process undertaken by the parties to the Programmatic Agreement resulted in the agreed upon right of way that was acquire through condemnation for the Route 1 Project. It is categorically inaccurate to suggest, as noted on pages 15 and 16 of the Assessment Report, that the National Trust at any time during the Route 1 consultation process agreed to a ROW of 184.5 feet through the Historic District. Such a right of way would not have been consistent with FHWA’s avoidance and minimization obligations under Section 4(f). As shown in Figure 1 below, the layout of the sidewalk and adjacent grass buffer strip along the northbound lane of Route 1 provides the area where further transportation enhancements would be accommodated at the Mount Vernon Highway intersection within the right of way acquired for the Route 1 Project.



Figure 1. Current Route 1 Configuration at Mount Vernon Highway Intersection

On June 11, 2020 the FCDOT, FTA, and the National Trust met to discuss the designs for the BRT Project within the Historic District. Generally, the National Trust was pleased with FTA’s efforts to minimize the need for additional right of way beyond what was take for the Route Project. Notes from that meeting indicate that one *assumption* was that a 14-foot-wide permanent utility easement would be required outside of the VDOT right of way; however, as shown in Figure 2 below the existing utility easement is currently located well within VDOT’s ROW and the utility poles in many locations are currently in close proximity

to the road (i.e., within 2-3' of the curb). Existing conditions along this portion of Route 1 indicate that the utility easement can easily be located in close proximity to the road and sidewalk.



Figure 2. NB Route 1 Utility Pole Locations Approaching Mount Vernon Highway

Additionally, the typical section distributed as an exhibit to the June 11, 2020 meeting notes indicates a proposed utility easement of 10 +/- feet from sidewalk's edge. See Figure 3. Further, some typical sections in the Assessment Report show utility pole placement within the proposed right of way with a width of only 4 feet. See Assessment Report, Typical Section 2 and 3.

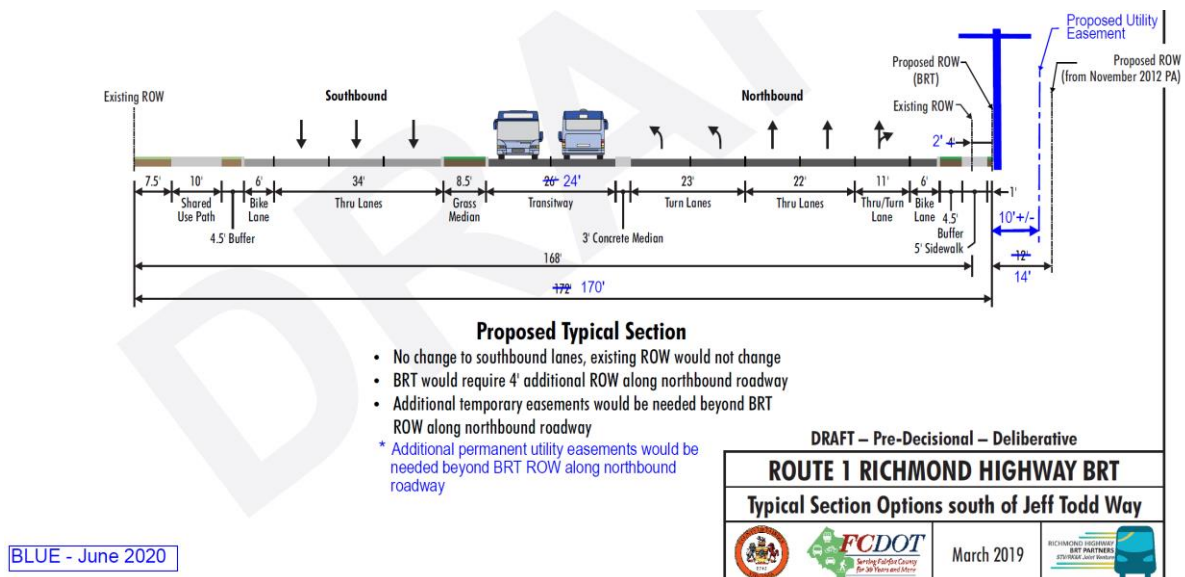


Figure 3 Proposed Typical Section at Mount Vernon Highway from June 11, 2020 FCDOT Meeting

The Assessment Report on page 16 also states that “[t]he existing wooden and chain-link fences belonging to the National Trust would need to be relocated to the south of the proposed ROW and permanent utility easement.” Typical Section 1B in the Assessment Report fails depict any utility easements within this portion of the roadway even though it is

an existing condition. It is also unclear why fencing would need to be relocated to the south of utility easements or why such a utility easement would need to encroach further into the Historic District when those utilities can be easily accessed for maintenance from Route 1. While Figure 3 indicates that some efforts were made (i.e., narrowing of the transitway) to address the effects of this Project on Woodlawn and the Historic District, it does not appear any additional design modifications (such as minimization of the utility easement) to this section of the roadway were considered.

Even minor encroachments into the Historic District are significant as the Historic District “retains the last traces of a rural, agricultural community, historically known as Woodlawn ... in a relatively small pocket of land that, through careful planning, conservation of open spaces, and judicious landscaping, maintains its historic feeling, despite later military and suburban development surrounding it” See Generally [Woodlawn Cultural Landscape Historic District Nomination Form](#).

Furthermore, while FTA may take the position that the additional right of way needed to accommodate the BRT Project is minimal or de minimis Section 4(f) use of Woodlawn and the Historic District, the National Trust disagrees. The Section 4(f) use analysis for the BRT Project cannot be performed in isolation or out of context from the original Section 4(f) use analysis performed for the Route 1 Project, which included future right-of-way accommodations for the BRT Project.

Finally, while the transitway and other elements for this project have been modified in an attempt to address impacts on Woodlawn and the Historic District, the National Trust remains concerned with the direct impacts from compliance with storm water management regulations that might at a later stage of the design of the BRT Project require additional right-of-way acquisition that would have significant adverse impacts to Woodlawn and the Historic District.

Additional Consultation is Required

The National Trust is concerned about the potential direct adverse effects of the Project on Woodlawn and the historic resources in the Historic District and the failure to fully minimize or avoid them. Because of the deficiencies in addressing adverse effects set forth above, the National Trust objects to the FTA’s no adverse effect and its de minimus Section 4(f) use determination.

The National Trust respectfully requests that the FTA address in writing the concerns raised in this letter. We further request additional opportunities to meet and resolve these issues.

Thank you for considering the National Trust for Historic Preservation’s comments.

Sincerely,



Ross M. Bradford
Deputy General Counsel

cc:

Douglas C. Miller, Fairfax County Department of Transportation
Vanessa Aguayo T., Fairfax County Department of Transportation
Erin Paden, Delaware Nation

Kenneth Bansah, Department of the Army (Fort Belvoir)
Barbara Byron, Fairfax County Government, Department of Planning and Development
Elizabeth Crowell, Fairfax County Park Authority
Ross Bradford, National Trust for Historic Preservation
Anissa Brown, Virginia Department of Transportation
Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends
Ronald Chase, Gum Springs Historical Society
Chris Barbuschak, Historical Society of Fairfax County



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

April 30, 2021

Adrienne Birge-Wilson
Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Re: Historic Architectural Effects Determination, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722

Dear Ms. Birge-Wilson:

The Fairfax County Department of Transportation (FCDOT) received the Department of Historic Resources (DHR) February 17, 2021 letter to the Federal Transit Administration (FTA), which provided concurrence with FTA's effect determinations for the project with the conditions that the designs for BRT stations and the designs and locations for noise walls within the established APE and viewshed be provided to DHR prior to finalization and construction. FCDOT acknowledges DHR's request for additional station design information and will provide 60 percent design plans for all proposed BRT stations, anticipated fall 2021. If the plans are delayed, FCDOT will contact DHR and provide a new anticipated date for submission. FCDOT welcomes advisory comments on the proposed station design and will subsequently consider and respond to DHR comments.

Regarding DHR's request for the design and locations of noise walls near identified historic properties, while potential noise barriers are identified during the National Environmental Policy Act (NEPA) process, this does not guarantee that they will be constructed. Potential barriers that have been identified during NEPA are subject to additional consideration during the final design phase of the project when more detailed information is available. If, after the project receives design approval from the Fairfax County Board of Supervisors, there are noise walls that are considered feasible and reasonable, community members that would benefit from the noise mitigation would be surveyed to determine whether they would want the barrier. If the noise walls are approved through public input, they would then be added to the final road design construction plans. DHR would be provided with the design of noise walls near identified historic properties once the barriers have been added to the final road design construction plans. FCDOT welcomes advisory comments on the proposed noise wall design and will consider and respond to DHR comments.

In addition to the DHR letter, FTA and FCDOT also received comments from three consulting parties during the comment period, including a formal objection from the National Trust for Historic Preservation (NTHP). Consulting party comments, along with the attached responses to those comments, will remain part of the project record as Section 106 consulting party correspondence. Comments received after the project deadline will be placed in the project file. FCDOT thanks the consulting parties for their participation in the Section 106 process. FTA is

continuing consultation directly with NTHP to resolve their objection. FCDOT is committed to working with stakeholders outside of the Section 106 process to provide updated project information during final design and construction.

Finally, FCDOT would like to provide additional information about anticipated project impacts at the Fair Haven Historic District. A map showing the updated LOD at Fair Haven has been appended to this letter. Because the limit of disturbance (LOD) at this location has been reduced from what was presented in the effects assessment, FTA and FCDOT assume that this reduction of LOD does not alter concurrence on the no adverse effect finding at the historic property.

Should you require additional information, please contact us at Vanessa.Aguayo@fairfaxcounty.gov or douglas.miller3@fairfaxcounty.gov.

Sincerely,



Vanessa Aguayo T., PE
Project Manager
Capital Projects & Traffic Engineering Div.
Fairfax County Department of Transportation



Douglas C. Miller
Environmental Specialist
Capital Projects & Traffic Engineering Div.
Fairfax County Department of Transportation

Enclosure:

Responses to Consulting Party Comments
Updated Project Design at Richmond Highway and Fair Haven Historic District

cc (with Attachment):

Daniel Koenig, Federal Transit Administration
Shauna Haas, Federal Transit Administration
Erin Paden, Delaware Nation
Kenneth Bansah, Department of the Army (Fort Belvoir)
Barbara Byron, Fairfax County Government, Department of Planning and Development
Elizabeth Crowell, Fairfax County Park Authority
Ross Bradford, National Trust for Historic Preservation
Anissa Brown, Virginia Department of Transportation
Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends
Ronald Chase, Gum Springs Historical Society
Chris Barbuschak, Historical Society of Fairfax County

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

This comment response matrix has been prepared to provide responses to all comments received within the January 15 to February 26, 2021 comment period on the project Effects Assessment. Consulting party comments have been summarized and consolidated, as appropriate, for the purposes of presentation and brevity. FCDOT responses are provided in the “Response” column.

Mr. Ronald Chase, Gum Springs Historical Society, February 15, 2021

Comment	Response
Reference to contributing resource DHR No. 029-6107 on page 19 is an error. The correct DHR No. for the Spring Garden Apartments is 029-6197.	FTA and FCDOT acknowledges the error in the Effects Assessment and confirms that DHR No. 029-6197 is correct.
The significance narrative in Section 5.6.2 of the Effects Assessment “misrepresents the actual housing that was demolished” and “gives the impression that it was 90% of all the homes in Gum Springs that were demolished.” The narrative also does not reference the uniqueness of Gum Springs and the history of the community, land, people, and institutions.	FCDOT acknowledges the uniqueness and significance of the Gum Springs Historic District and through the Section 106 process afforded it the same consideration as properties listed or determined eligible for listing in the National Register of Historic Places by treating it as eligible for listing in the NRHP. The description and significance summary included in the Effects Assessment did not intend to provide a detailed narrative of the district. The level of information was intended to be a reference point for assessing effects rather than a comprehensive analysis of the district. FTA and FCDOT also continue to encourage pursuing further research and evaluation of Gum Springs at the local level, as recommended by DHR, outside the Section 106 process for this undertaking.
Referencing Sheets 8 and 9 of Appendix B, Mr. Chase stated that not enough of the area being impacted by the Gum Springs and Hybla Valley BRT stations is shown.	The conceptual plans presented in Appendix B show the entire proposed limits of disturbance for the project. The stations will be located outside the boundaries of the Gum Springs Historic District.

Ms. Martha Claire Catlin, Alexandria Monthly Meeting of the Religious Society of Friends, February 22, 2021

Comment	Response
Section 5.4 of the report inaccurately refers to the NRHP-listed Woodlawn Cultural Landscape Historic District as NRHP-eligible and omits the Woodlawn Quaker Meetinghouse and the historic African American Woodlawn Methodist Cemetery as components of the district in the description. The cemetery is not included in Figure 5-2 as a property included in the Woodlawn Cultural Landscape Historic District.	The Effects Assessment’s abbreviated description of the historic district does not individually list each contributing resource. Its presence in the report is for use as a reference point for assessing effects and was not intended to be a comprehensive description of the entire district. FCDOT acknowledges that the cemetery is a discontinuous contributing resource within the Woodlawn Cultural Landscape Historic District; that said, the cemetery is located far outside of the

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

Comment	Response
	APE for the project. The Woodlawn Quaker Meetinghouse, also a contributing resource in the district, is outside of the APE as well.
Temporary effects are potentially harmful to Friends’ use and access to the Woodlawn Quaker Meetinghouse, which is individually listed in the NRHP. Temporary effects of the project could “isolate, or inhibit access to, the meetinghouse” and Woodlawn’s Pope-Leighey House, which share an entrance drive that connects with US Route 1 near the proposed construction location. Disclaimers on Sheet 1 on Appendix B state that the LOD and design details are subject to change. Due to the proximity of the anticipated disturbance to the Woodlawn Road entrance to the meetinghouse, effects to the entrance cannot be ruled out, and “such effects would be harmful to Friends’ ongoing use and access to the Woodlawn Quaker Meetinghouse.” Friends request to be included in ongoing consultation with FTA, along with our neighbors at Woodlawn Pope-Leighey, concerning all aspects of the proposed BRT undertaking that could in any way affect the area near the entrance drive or could otherwise affect the setting of the meetinghouse, including staging areas and other activities notwithstanding whether the effects of such activity may be deemed temporary.	While the BRT transitway will be constructed within the median of Richmond Highway on either side of the Woodlawn Road intersection, the work would not hinder access to Woodlawn Road, either temporarily or permanently. FCDOT will provide information to property owners whose access may be affected during construction as part of pre-construction outreach.
Sheet 1 of Appendix B does not indicate the APE and misleadingly labels the Woodlawn Quaker Meetinghouse as within the boundaries shown for Woodlawn Plantation.	The purpose of Appendix B is to provide the conceptual plan for the project and was not intended to be a representation of the APE. The APE is represented in Figures 2-1 through 2-3 of the report. The boundary for Woodlawn Plantation is clearly mapped and labeled in Figure 5-2 of the report.
The Woodlawn Quaker Meetinghouse is not referenced in the text of report, even as a contributing resource to the Woodlawn Cultural Landscape Historic District. The report should state clearly if the intent is to meet the requirements of Section 106 and evaluate effects only to components of the Historic District. The APE, as delineated, includes only portions of the Historic District within the Woodlawn/Pope-Leighey component of the Historic District, and “it remains unclear how FTA ruled out the potential for effects on other components of the Historic District, specifically the Meetinghouse, when the nature and character of the Historic District is as a collection of interrelated historic properties.” The APE should include the Meetinghouse due to the proximity of it and its setting to the proposed	The Effects Assessment’s abbreviated description of the historic district does not individually list each contributing resource. FTA established the APE, and DHR agreed to the APE on November 14, 2018. The APE used for the Effects Assessment was included in the April 2019 Historic Architectural Survey Report provided to DHR and the consulting parties. Although the APE as drawn does not include the entirety of the historic district boundaries, the Effects Assessment considered the District’s significance, and potential effects to the District from the undertaking, as a whole.

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

Comment	Response
<p>construction and “correct analysis of the nature and effects of the proposed BRT undertaking would depend on FTA’s accurate assessment of the Area of Potential Effect.”</p>	
<p>The judgement that “Church at 7730 Fordson Road (DHR No. 029-6045)” and “House at 7712 Fordson Road (DHR No. 029-6361)” are not adversely affected appears to be based on the concept of integrity not applying to those properties. It further appears to be based on ‘denial that the properties exhibit architectural characteristics that would render them subject to visual effects, or upon a determination that any such architectural characteristics are unrelated, are not “significant features,” and are therefore irrelevant, to the properties’ eligibility for the National Register.’</p> <p>Referencing sections of the Effects Assessment: “Such conclusions illogically suggest that the mere existence and use of the historic properties are the only attributes to be considered in determining the effects of the BRT project on these structures, and imply that only their existence and use qualify them for the National Register and would therefore be worthy of considering. The actual, physically expressed historic character of these buildings, notwithstanding their eligibility for the National Register, as acknowledged by FTA, is dismissed as nonexistent. The language FTA has depended on to justify a finding of “no adverse effect” appears to directly contradict the basis of its findings that the properties meet the criteria for listing in the National Register.”</p> <p>The report’s discussion of effects to the Gum Springs Historic District setting ‘does not provide convincing information or analysis to support the Report’s conclusion that “The undertaking would have no adverse effect to the Gum Springs Historic District (DHR No. 029-6581) or any contributing elements located within the undertaking’s APE.”’</p>	<p>The seven aspects of integrity were considered in the Effects Assessment with regard to the Gum Springs Historic District as a whole, and to the contributing resources within the APE. The district, and each contributing feature in the APE, exhibit high levels of integrity of location, design, materials, workmanship, and association. The aspect of setting is significant within the district’s boundaries. Setting outside of the district is not a significant feature of the district, largely due to mid- and late-twentieth century developments along Richmond Highway. The district’s integrity of feeling has already been marginally diminished due to late-twentieth-century infill development. Thus, the Effects Assessment considered the potential for adverse effects, including visual effects, to the district and to its contributing resources present within the APE. Adverse effects can include “change of the character of a property’s use or of physical features within the property’s setting that contribute to its historic significance” (36 CFR 800.5(a)(2)(iv)) and visual elements “that diminish the integrity of the property’s significant historic features” (36 CFR 800.5 (a)(2)(v)). The project will not change the character of the church or house’s use, nor will it alter the physical features or setting of the buildings.</p> <p>FTA and FCDOT acknowledges the historic character of the buildings and that the properties exhibit significant architectural features; however, the introduction of a BRT station on Richmond Highway near, but largely obscured from view of, the contributing house and church resources, does not diminish the resources’ significant architectural features. For these reasons, the project will have no adverse effect to the Gum Springs Historic District.</p>

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

Comment	Response
<p>Ms. Catlin asked, “has the character of the Gum Springs Historic District’s Route One setting been evaluated? Has a conclusion been drawn that this segment of Route One’s character has been diminished to the degree that it has no relevance to the Historic District?” Comments further stated that “while the character of the original farm roads evolved to reflect evolving commercial, residential, and transportation patterns, Gum Springs has always maintained a roadside orientation, including the pedestrian life that offers opportunity for social interaction. Moreover, Gum Springs community members could often be credited for entrepreneurial, religious, and other aspects of the evolving character of “the Highway” beyond its borders but accessible by its roads.” The comments questioned whether Route 1 could provide a context for the properties in the APE, particularly the Gum Springs Historic District. Ms. Catlin stated that the report’s assessment did not evaluate “foreseeable potential effects of the BRT project on the character of the setting of the historic district, or to provide any information about any analysis that may have led to the Report’s conclusion that the property’s setting would not be (further) diminished.”</p>	<p>The Richmond Highway corridor was studied as part of this project and determined to be not eligible due to changes to the roadway itself and adjacent development. Comments regarding identifications and eligibility received in response to the August 2020 report distribution were answered in the previous phase of the Section 106 process, as an appendix to the Effects Assessment. The eligibility of Richmond Highway as a historic property was evaluated in detail in the Addendum to the Historic Architectural Survey submitted to Consulting Parties and DHR in November 2019. FTA determined Richmond Highway not eligible for the NRHP, and DHR concurred that it was not eligible in a letter dated December 9, 2019.</p> <p>DHR staff concurred with the assumptions for the treatment of Gum Springs’ eligibility contained in the Gum Springs Significance Statement and Effects Assessment Memorandum sent via email on September 14, 2020. The purpose of the memorandum was to provide assumptions regarding criteria of eligibility and contributing resources located within the current undertaking’s APE in order to enable an assessment of potential effects to the Historic District as a result of the undertaking. As stated above, the undertaking’s effects to Richmond Highway would not affect the integrity of the district’s location relative to and associated with Richmond Highway, nor would it diminish the district’s significant setting.</p>

Mr. Ross Bradford, NTHP, February 22, 2021

Comment	Response
<p>The EFLHD Richmond Highway Improvements Project, which resulted in an adverse effect and a Section 4(f) use determination for Woodlawn National Historic Landmark, Woodlawn Historic District, and the Sharpe Stable Complex, already made accommodations for future transit enhancements such as bus rapid transit within the planned median.</p>	<p>The Federal Highway Administration (FHWA) was the lead federal agency for the Eastern Federal Lands Highway Division (EFLHD) Richmond Highway Improvements Project. The BRT is a separate, independent project from the EFLHD project, and was comprised of a different team and different lead agency.</p>

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

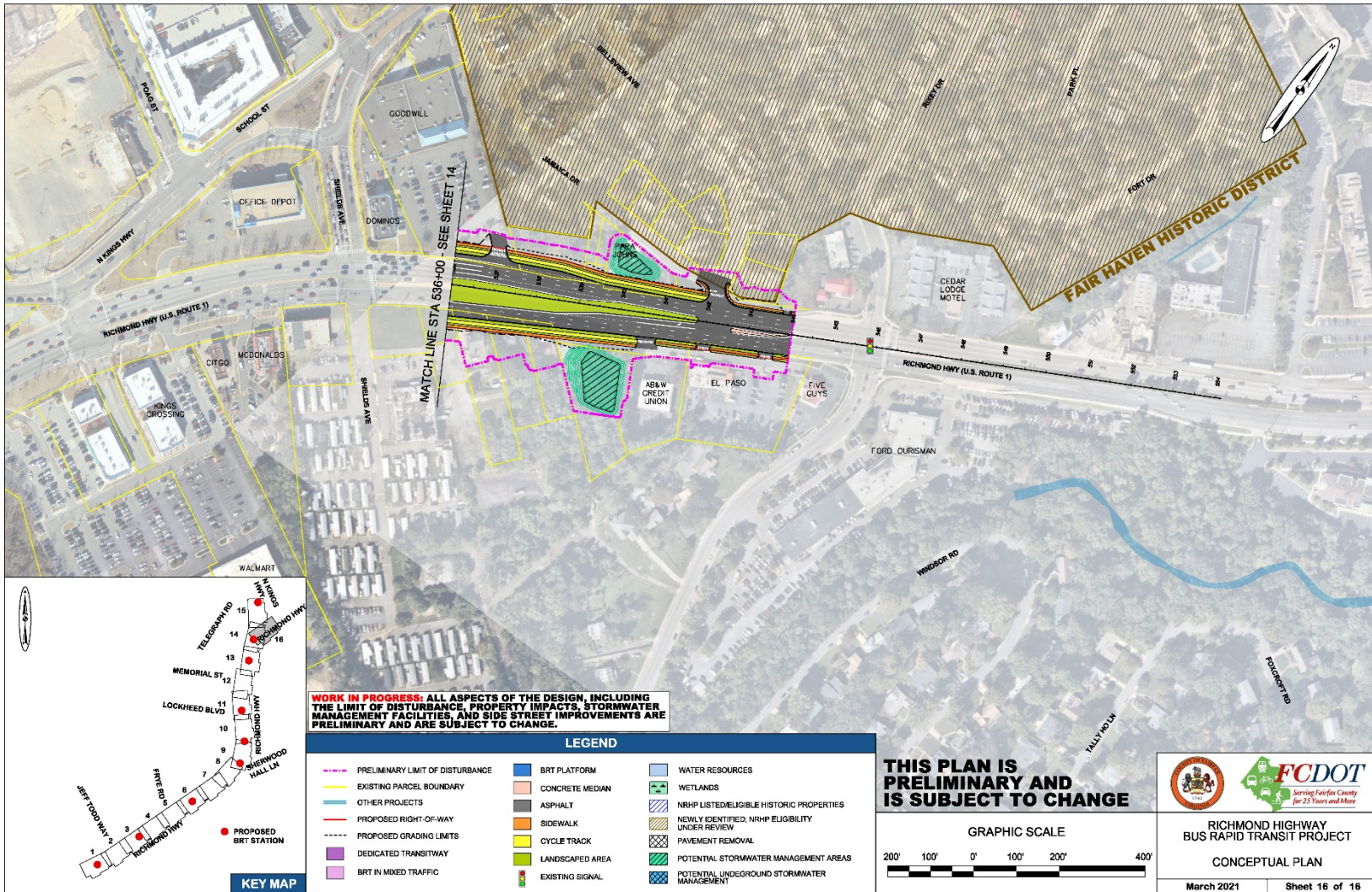
Comment	Response
	<p>That project stated that it would make accommodations for future transit enhancements in the planned median. However, the ROW obtained by VDOT from Woodlawn did not provide the necessary space in the median to actually accommodate future transit. The final completion date of the EFLHD Richmond Highway Corridor Improvements Project was January 18, 2018.</p>
<p>NTHP disagreed that the EFLHD Richmond Highway Improvements Project led to an agreement for 184.5 feet of ROW through the Woodlawn Cultural Landscape Historic District.</p>	<p>The 184.5-foot ROW referenced in the Richmond Highway BRT Project Effects Assessment came from measuring scalable plans provided in the Programmatic Agreement for the EFLHD Richmond Highway Improvements Project. FCDOT acknowledges that it is not referenced in the text of the Programmatic Agreement.</p>
<p>Utility poles are currently next to the road (within 2-3 feet of the curb); therefore, a 14-foot easement as shown in the typical section is unnecessary. Why would the existing wooden and chain link fences belonging to the National Trust at Woodlawn Plantation need to be relocated to south of the proposed ROW and permanent utility easement? The typical section does not show any utility easements within this portion of the roadway; additionally, why would the easement need to encroach into the Woodlawn Cultural Landscape Historic District if the utilities can already be accessed for maintenance from Route 1?</p>	<p>To address NTHP's concerns, FCDOT continues to seek ways to minimize permanent impacts to Woodlawn, including fence relocation, within the requirements set forth by the utility provider (Dominion Energy). FCDOT will continue coordination with Dominion Energy on ways to reduce the easement and to provide NTHP with updated information as design progresses. Commitments made during this process will be included in the Richmond Highway BRT NEPA process.</p>
<p>What design modifications were undertaken to address effects of the project on Woodlawn Plantation and the Woodlawn Cultural Landscape Historic District other than narrowing the transitway?</p>	<p>In order to narrow the transitway through the project corridor and reduce the number of automobile lanes, the BRT project is pursuing a design waiver for elimination of the right turn lane, instead combining it with the rightmost through lane, thus minimizing impacts throughout the corridor, including impacts to the Woodlawn Cultural Landscape Historic District and Woodlawn Plantation.</p> <p>The project team also minimized impacts by not implementing the comprehensive plan cross section for the Richmond Highway Corridor at this location. The existing cross section is narrower than the comprehensive plan section.</p>

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

Comment	Response
Compliance with stormwater management regulations might require additional ROW acquisition from the property at a later date.	No new stormwater management infrastructure will be installed on the Woodlawn property; either existing infrastructure will be utilized or stormwater requirements will be managed within the existing VDOT ROW. FTA will include this as a commitment in the Richmond Highway BRT NEPA document and contractors will need to abide by the commitments.

FCDOT Responses to Consulting Party Comments Received Regarding the *Historic Architectural Effects Assessment Technical Report (Effects Assessment)*

Updated Project Design at Richmond Highway and Fair Haven Historic District



Richmond Highway Bus Rapid Transit Project

Historic Architectural Survey Technical Report for

Fairfax County Department of Transportation

May 15, 2019

Comments From:

Ronald L. Chase, President
Gum Springs Historical Society, Inc.

Gum Springs, the Oldest African American Community in Fairfax County is not mentioned in the report regarding its historical importance or impact this project will have on the Gum Springs community. The community served as a haven for freedmen and runaway slaves . Setting the stage for a unique evolution and development of a community that should never have existed.

Preservation of this historic community is also a matter of environmental justice.

All listed Items listed below are adversely impacted.

1. Map C-8 shows the location of the Little Hunting Creek and bridge. The Little Hunting Creek was the location of the Baptizing Ceremonies for the Bethlehem Baptist Church, the first institution in Gum Springs started by Sam Taylor, a runaway slave from Carolyn County Virginia.
(Filing for a Virginia State Historic Road Marker)

The proposed bridge construction does not consider the overall effect of this historic location.

- 1a. The Bridge Construction may also destroy the first row of the Gum Springs/Spring Gardens Apartment.
2. DHR 029-6198 : Page A-9 Greater Morning Star Apostolic Church/7929 Richmond
Location of the third school in Gum Springs; first black public school 1865.
(Filing for a Virginia State Historic Road Marker)
3. DHR 029-6045 : Page A-5 Woodlawn Methodist Church, Gum Springs Virginia
Your finding ruled Not Eligible, you have not evaluated it.
(Has received a Virginia State Historic Road Marker)
4. Bethlehem Baptist Church, Fordson Road, Gum Springs Virginia
DHR: Not Listed
(Has received a Virginia State Historic Road Marker)
5. Odd Fellows Hall, Fordson Road, Gum Springs , Virginia
DHR: Not Listed



County of Fairfax, Virginia

To protect and enrich the quality of life for the people, neighborhoods and diverse communities of Fairfax County

May 31, 2019

Daniel Koenig, Environmental Protection Specialist
Federal Transit Administration
1760 Market Street, Suite 500
Philadelphia, PA 19103

SUBJECT: Fairfax County Heritage Resources Comment for Section 106 Project and the Historic Architectural Survey Technical Report for the Richmond Highway Bus Rapid Transit Program, Fairfax County, Virginia

Mr. Koenig:

Thank you for providing the opportunity to review this report. Please see the information provided below by Fairfax County Department of Planning and Zoning Heritage Resources staff in response to your request for review of the Historic Architectural Survey Technical Report (HASTR) for the Section 106 Bus Rapid Transit (BRT) project along the Route 1 corridor dated April 2019. Comments provided by the Fairfax County Architectural Review Board and the Fairfax County History Commission are attached.

Prior to these comments, county Heritage Resources staff provided draft preliminary comments to the Federal Transit Administration via the Fairfax County Department of Transportation in December of 2018 and in March of 2019 with the addition of comments from both the Architectural Review Board and the Fairfax County History Commission. Both letters were in response to the Section 106 project initiation and proposed Area of Potential Effects (APE) letter sent out by the Federal Transit Authority (FTA) on October 4, 2018.

Description of the Proposed Activity

The implementation of the bus rapid transit (BRT) service is proposed along a nine-mile portion of Richmond Highway (Route 1) and North Kings Highway (Route 241). The project will extend from the Huntington Metro Station on the northern end to Fairfax County Parkway on the southern end. The proposal includes construction of a new BRT which includes dedicated median bus lanes, nine BRT stations, roadway widening, streetscape improvements, and pedestrian and bicycle transportation facilities. This segment of the Richmond Highway

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corridor transects five community business centers and interstitial suburban neighborhoods and Fort Belvoir. It is developed with commercial and residential uses.

Area of Potential Effect

When analyzing any effect on heritage resources consideration the defined Area of Potential Effect (APE) is reviewed. As stated on page 21 of the HASTR, the APE “accounts for the potential visual, atmospheric, or audible elements resulting from the undertaking” and takes into consideration both direct and indirect effects. Furthermore, the boundaries of this APE were defined in the HASTR as:

- “From the southern extent of the corridor to Ladson Lane, the APE was established as 150 feet from each side of the Richmond Highway / U.S. Route 1 centerline.
- “From Ladson Lane to Jamaica Drive, the APE was established as 300 feet from each side of the Richmond Highway / U.S. Route 1 centerline.
- From Jamaica Drive to the Huntington Metrorail System, the APE was established as 125 feet from the Richmond Highway / U.S. Route 1 centerline or the North Kings Highway / State Route 241 centerline.
- The APE encompasses the general area of the Huntington Metrorail Station.”

The APE was determined by the Federal Transit Administration (FTA) with consultation from the Fairfax County Department of Transportation (FCDOT) and concurrence from the Virginia Department of Historic Resources (VDHR) on November 14, 2018.

Staff identified county heritage resources that are located within the defined APE and could have direct effects, including:

- Five resources either listed on or eligible for the National Register of Historic Places (Attachment 1, Page 7)
- One County Historic Overlay District-Woodlawn HOD (Attachment 1, Page 8)
- Eight properties listed on the County Inventory of Historic Sites (Attachment 1, Pages 8-9)
- 28 properties that were identified by county staff as potential historic resources through a windshield survey conducted in 2015 and 2016 (Attachment 1, Pages 11-13)
- One historic community recognized in the Comprehensive Plan- Gum Springs (Attachment 1, Pages 13-15)

Staff also identified county heritage resources that are proximate to the defined APE and could have indirect effects:

- One other historic overlay district, Huntley HOD, 6918 Harrison Road (Attachment 1, Page 8)
- 13 properties listed on the County Inventory of Historic Sites (Attachment 1, Page 10)

Please see Attachment 1 for a full list of county heritage resources that are within and proximate to the APE.

Staff Recommendations

1. Additional Research Requested:

- **Gum Springs:** The historic Gum Springs community was not identified nor evaluated for inclusion on the National Register of Historic Places. This historic community is recognized by the Fairfax County Comprehensive Plan and further research is recommended in the Plan. Gum Springs, located southeast of the intersection of Fordson Road and Route 1, likely maintains its integrity as a heritage resource though the dependents of the original free black community. The consultant identified two post World War II suburbs as districts in its survey and Gum Springs could be surveyed and analyzed in a similar fashion. Gum Springs could be analyzed as a Traditional Cultural Property as defined by the National Park Service regarding the National Register of Historic Places.

The Pride of Fairfax, a building integral to the Gum Springs community evolution should be analyzed. Staff recommends further research be completed to determine the eligibility and effects this project may have on the Gum Springs community. Please see the Comprehensive Plan Section of Attachment 1 (Pages 13-15) for more information on the Gum Springs Community.

- **Route 1 Historic Significance:** Staff requests additional background research evaluating the historic significance of Route 1. After review of the provided V-CRIS documents and the Background Research section of the HASTR, there is minimal historic context mentioned regarding the 20th century history and significance of Route 1 itself, specifically as a major transportation network.

The historic resources constructed during the 20th century, both those previously identified and those identified during this survey, are noted in the VCRIS files provided by the consultant as being constructed during the post-World War II era. However, the consultant stated that the resources are not considered to be significant to Route 1 and its development. The resources could be evaluated for inclusion to the National Register in a broader context, including how they relate to the increased use of Route 1 as a major transportation corridor and the increased development associated with the corridor during the 20th century.

- County Windshield Survey Sites: Further analysis of National Register eligibility and determination of effects for all windshield survey sites that were identified within the APE should be completed. Staff has outlined the properties from the County windshield survey that need further research in Table 4 (Pages 11-13) of this report.
- 6300 Richmond Highway (current Wells Fargo): This item was identified as non-eligible for the National Register by the Virginia Department of Historic Resources (DHR No. 029-6445). The structure is the original building of the Penn-Daw Motor Hotel which opened in 1927 and the developers of the hotel were influential in naming the community Penn-Daw.
- Post -WWII Suburbs: Additional research could be completed regarding whether the two post-world war suburbs identified, Fair Haven and Jefferson Manor, could be included as eligible for the National Register under an existing National Register listing for Multiple Property Listings for Post-WWII suburbs.

Additional staff comments:

1. **Area of Potential Effects:** Staff acknowledges that previous reviews of the Route 1 Corridor for effects on heritage resources have been conducted with previous proposals and projects, including the Route 1 Widening project and the county led Embark study. In addition, and as a result of Embark, the Fairfax County Comprehensive Plan recommends additional development with varying heights around the BRT stations that may impact the existing viewsheds to and from existing heritage resources. Once the height of the BRT stations is known, and the National Register eligibility determinations has been completed by the applicant, a viewshed analysis could assist both staff and consulting parties in analyzing impacts on existing heritage resources.

It would be helpful for the consultant to place the locations of the BRT stations on the Architectural Survey Results Maps and Historic Property Maps as included in the appendices of the HASTR for assistance in consulting party viewshed analysis.

Additional information should be provided for the APE delineations including varying width, and location of associated construction activities (any ground disturbance) and staging areas. This will assist staff and other consulting parties in their analysis of the impact on existing heritage resources.

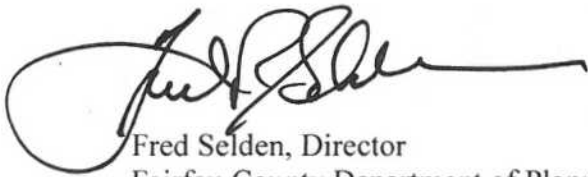
2. **National Register of Historic Places Sites:** Any site listed on or eligible for the National Register of Historic Places should be preserved and avoided. Of note, Woodlawn Plantation is identified as a National Historic Landmark, has a nationally recognized

significance and as such should receive the highest level of protection. Any physical or visual impact on listed or eligible sites should be minimized. (Attachment 1, Page 1).

3. National Register Eligibility: Heritage Resources staff agrees with the two recommendations of National Register potential eligibility determined in the April 23, 2019 FTA/FCDOT Survey for the Penn Daw Fire Station and Walsh Hall Catholic Church (Attachment 1, Pages 11-12)
4. Architectural Review Board review: According to section 7-200 of the Zoning Ordinance, the Fairfax County Architectural Review Board is required to be consulted for any physical or visual impact from the proposed project in historic overlay districts.
5. Fairfax County History Commission review: The Fairfax County History Commission should be consulted for any physical or visual impact from the proposed project in or adjacent to properties listed on the Inventory of Historic Sites.
6. Archaeological impacts: The Archeological Collections Branch of the Fairfax County Park Authority should be consulted for the ground disturbance of any property within or proximate to the APE.
7. Staff requests a copy of the research report from the Architectural Survey completed by Rummel, Klepper & Kahl on October 29, 2018 and November 27, 2018 for county records.

Thank you for providing us with the opportunity to comment. If you have any questions, please feel free to contact either Laura Arseneau at 703-324-1209, laura.arseneau@fairfaxcounty.gov or Leanna O'Donnell at 703-324-1380 leanna.o'donnell@fairfaxcounty.gov.

Sincerely,



Fred Selden, Director
Fairfax County Department of Planning and Zoning

Cc:

Tom Biesiadny, Director, Fairfax County Dept. of Transportation
Vanessa Aguayo, Fairfax County Dept. of Transportation
Douglas Miller, Fairfax County. Dept. of Transportation
Marianne Gardner, Director, Planning Division, DPZ
Leanna H. O'Donnell, Branch Chief, Policy and Plan Development, PD, DPZ
Elizabeth Crowell, Archaeologist, Fairfax County Park Authority
Adrienne Birge-Wilson, Virginia Department of Historic Resources

Attachments:

1. Staff Identified Heritage Resources within and proximate to the APE
2. Fairfax County Architectural Review Board Comments
3. Fairfax County History Commission Comments

ATTACHMENT 1

Staff Identified Heritage Resources within and proximate to the APE

National Register of Historic Places Listed and Eligible Sites within the APE

Below is a table that outlines the National Register of Historic Places (NR) listed and eligible sites and the dates they were designated:

Table 1- National Register Sites

	Name of Site	Address	Listed on NR	Eligible for NR
1.	Woodlawn Cultural Landscape Historic District	Various	9/2018	
2.	Original Mount Vernon High School	8333 Richmond Hwy.	5/2018	
3.	Camp A.A. Humphreys Pump Station and Filter Building	9155 Richmond Hwy.		Yes
4.	Fort Belvoir Military Railroad Historic District Corridor	Various		Yes
5.	Fort Belvoir Military Railroad Track Bed	Various		Yes

As noted in the Fairfax County Comprehensive Plan, 2017 Edition Area IV Mount Vernon Planning District, as Amended through 10-16-2018, Overview on page 16:

“The Virginia Landmarks Register and the National Register of Historic Places also officially recognize properties meeting specific criteria. Like the county Inventory, benefits of designation include public recognition and enhanced support for preservation. In addition, projects that are funded or sanctioned by federal government agencies may require review to determine if they will have any effect on properties listed in or eligible for listing in the National Register for Historic Places. Alternatives must be explored to avoid or reduce harm to the historic properties.”

These sites listed above have nationally recognized significance and as such should receive the highest level of mitigation and protection. Any physical or visual impact on these areas should be minimized.

County Historic Overlay Districts

There is one county designated Historic Overlay District (HOD) that is directly within the proposed APE. This historic district, Woodlawn HOD, is located at 9000 Richmond Highway. The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Mount Vernon Planning District, as Amended through 10-16-2018, Overview, page 16 states:

“The county’s Historic Overlay District is a zoning tool used to regulate proposed new construction and changes to existing structures in areas containing heritage resources to ensure compatibility with the resources. Site design, facades, demolition, and building materials must be reviewed and approved by the county's Architectural Review Board.”

One other district, Huntley HOD (6918 Harrison Road) is not directly within the APE but there may be visual impacts from the proposed developments and BRT stations. Additional viewshed and impact analysis was completed for this HOD during the Embark study and recommendations for minimization of visual impact are included in the Comprehensive Plan.

As county designated and protected historic areas, every effort should be made to avoid any physical or viewshed impact. Woodlawn HOD especially will be affected, as the Route 1 corridor bisects the historic overlay district. Staff requests that any physical or visual impact to these areas, especially to the viewshed that is the basis for the HOD, be brought to the Architectural Review Board (ARB) for consultation and comment.

County Inventory of Historic Sites

The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Mount Vernon Planning District, as Amended through 10-16-2018, Overview, page 16, describes the Inventory of Historic Sites:

“The county Inventory of Historic Sites includes properties which meet certain eligibility criteria and are officially designated by the county's History Commission. In addition to historic, architectural or archaeological significance, property that serves as a focus of community identity and pride may also be recognized. The benefits of designation include public recognition of the structure's significance and enhanced support for preservation. Owners of properties included in the Inventory may meet with the county's Architectural Review Board on a voluntary basis to review proposed changes to their properties. Project review and

approval by the county's Architectural Review Board may be required in accordance with the guidance provided by the Policy Plan under Land Use Appendix 9 Residential Development Criteria 8 Heritage Resources.”

The following list highlights the properties listed on the Fairfax County Inventory of Historic Sites that staff identified are within the defined APE:

Table 2- Inventory of Historic Sites within APE

	Name of Site	Location
1.	Fort Lyon Earthworks*	South side of James Drive and N. Kings Hwy.
2.	Mount Eagle*	Located on the west side of Richmond Hwy and Mount Eagle Road intersection
3.	Spring Bank*	*located behind existing Walmart at 6303 Richmond Hwy.
4.	Original Mount Vernon High School, V, N	8333 Richmond Hwy.
5.	Woodlawn Cultural Landscape HD, V, N	Various
6.	Ft. Belvoir Military Railroad Historic Corridor	Various
7.	Camp Humphreys Pump Station and Filter Building	9155 Richmond Hwy.
8.	Otis T. Mason House	8907 Richmond Hwy.

**denotes site is demolished, but still retains archaeological potential*

V- listed on Virginia Landmarks Register

N- listed on the National Register of Historic Places

For the sites shown above listed on the Inventory of Historic Sites within the APE, staff recommends that avoidance be the primary goal. For sites that are already denoted as demolished, staff recommends that the Archaeological Collections Branch of the Fairfax County Park Authority be consulted for further analysis.

Staff identified the additional sites below on the Fairfax County Inventory of Historic Sites that are proximate to the APE:

Table 3- Inventory of Historic Sites proximate to APE

	Name of Site	Location
1.	Fort Willard Circle	6625 Fort Willard Circle
2.	George Washington Memorial Parkway viewshed V,N	Various
3.	Hollin Hills Neighborhood, V, N	Various
4.	Woodlawn Methodist Church (part of Gum Springs Community)	7730 Fordson Road
5.	Bethlehem Baptist Church (part of Gum Springs Community)	7836 Fordson Road
6.	Peake Family Cemetery	Martin Luther King Jr. Park off of Fordson Road
7.	Accotink United Methodist Church	9043 Backlick Road
8.	Woodlawn Plantation, V,N	9000 Richmond Hwy.
9.	Pope-Leighey House, V, N	9000 Richmond Hwy.
10.	Grand View	9000 Richmond Hwy.
11.	Woodlawn Friends Meeting House, V, N	8990 Richmond Hwy.
12.	Woodlawn Baptist Church*	9001 Richmond Hwy.
13.	George Washington's Grist Mill, V, N	5514 Mount Vernon Memorial Hwy.

**denotes site is demolished, but still retains archaeological potential*

V- listed on Virginia Landmarks Register

N- listed on the National Register of Historic Places

Although these sites listed above are not directly within the determined APE boundaries, because of their proximity to the APE, it is foreseeable that there may be potential visual effect from the proposed BRT stations and associated developments.

Staff further recommends that the Fairfax County History Commission be consulted for any potential impact on sites listed on the Inventory of Historic Sites.

County Surveyed Sites

Between 2015 and 2016, Department of Planning and Zoning staff completed an architectural windshield survey of potential significant historic structures and properties along and near to the Route 1 Corridor. They identified 28 sites for further evaluation (listed in the table below).

The Federal Transit Administration identified 117 new sites to examine further in their Proposed APE assessment and letter dated October 4, 2018. Of those 117 sites, four were included in the county windshield survey of Route 1 as demonstrated in the table above.

Nine of the County identified windshield survey sites had already been determined not eligible by the Virginia Department of Historic Resources (VDHR) for the National Register. Requests additional eligibility justification as noted in the Table.

For the remaining items that do not have an eligibility determination from VDHR and are still standing, further research is needed. Staff recommends that further research of eligibility be completed to determine the significance, if any, of these structures.

Table 4- Fairfax County Windshield Survey Sites

Property Addresses Identified in Fairfax County Windshield Survey	Identified by FTA in 10/4/2018 letter for further research	Identified by Architectural Survey by FTA- 4/23/2019	Determined not NR eligible by VDHR	County HR Staff Recommendation
1. 2908 Farmington Drive- Dwelling				No visual impact
2. 2904 Farmington Drive- Dwelling				No visual impact
3. 5803 North Kings Hwy- Huntington Metro Police Station		Outside APE		More research- architectural significance and potential viewshed impact
4. 5825 Foley Street- Dwelling				No visual impact
5. 2060 Huntington Avenue- Dwelling				No visual impact
6. 2056 Huntington Avenue- Dwelling				No visual impact
7. 2816 Franklin Street- Dwelling	X	Not Eligible		More research*
8. 6416 Richmond Highway- Penn Daw	X	Eligible for NR		Agree

Property Addresses Identified in Fairfax County Windshield Survey	Identified by FTA in 10/4/2018 letter for further research	Identified by Architectural Survey by FTA- 4/23/2019	Determined not NR eligible by VDHR	County HR Staff Recommendation
Fire Station (A & A rentals)				
9. 3000 Franklin Street- Dwelling				No visual impact
10. 2909 Franklin Street- Dwelling				No visual impact
11. 6701 Richmond Hwy- Cleaners		Not Eligible	X	More research*
12. 6801 Richmond Hwy- Cash Title Loans	X	Not Eligible		More research*
13. 2817 Schooley Drive- Dwelling		Not Eligible		More research*
14. 6821 Richmond Hwy- Dwelling/ Chamber of Commerce		Not Eligible	X	More research*
15. 6831 Richmond Hwy- Dwelling		Not Eligible	X	More research*
16. 6835 Richmond Hwy- Dwelling		Not Eligible	X	More research*
17. 6969 Richmond Hwy- Office building const. 1974	X	Not Eligible		More research*
18. 2901 Popkins Lane- Walsh Hall Catholic Church		Eligible	X	Agree with consultant eligibility determination
19. 7809 Fordson Road- Pride of Fairfax		N/A		More research- Gum Springs
20. 8257 Richmond Hwy- Red Carpet Inn- const. 1945		No recc.	X	More research*
21. 8359 Richmond Hwy- Dwelling		No recc.	X	More research*
22. 8369 Richmond Hwy- Dwelling (Pretty Pets Grooming)		No recc.	X	More research*

Property Addresses Identified in Fairfax County Windshield Survey	Identified by FTA in 10/4/2018 letter for further research	Identified by Architectural Survey by FTA- 4/23/2019	Determined not NR eligible by VDHR	County HR Staff Recommendation
23. 8256 Richmond Hwy- NC Style BBQ const. 1959		No recc.		More research*
24. 8592 Richmond Hwy- Mt. Vernon Knights of Columbus, const. 1970		No recc.		More research*
25. 8505 Highland Lane- Woodlawn Elementary School		No recc.		More research*
26. 8609 Richmond Hwy- Dwelling		No recc.	X	More research*
27. 8653 Richmond Hwy- First AME Church		No recc.		More research*
28. Woodlawn UMC cemetery		Eligible		Already in NR Woodlawn Cultural Landscape Historic District.

*These resources could be evaluated for inclusion to the National Register in a broader context, including how they relate to the increased use of Route 1 as a major transportation corridor and the increased development associated with the corridor during the 20th century.

County Comprehensive Plan Heritage Resources References- Gum Springs and Hollin Hills

Additionally, the Fairfax County Comprehensive Plan recognizes the communities of Gum Springs and Hollin Hills as important county heritage resources. Staff has identified these here as they could be impacted by the proposed project.

In the Comprehensive Plan, Area IV, Mount Vernon Planning District, MV5-Fort Hunt Community Planning Sector, Heritage Resources on page 90, the Comprehensive Plan singles out the historic free-black community of Gum Springs as an important county resource, and recommends The Pride of Fairfax, a community landmark located in Gum Springs, be evaluated for potential inclusion in the Inventory of Historic Sites.

The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Mount Vernon Planning District, amended through 10-16-2018, MV6-Fort Hunt Community Planning Sector, beginning on page 90 states:

"Heritage Resources

The early and mid-20th century and more dispersed neighborhoods and open spaces in this sector may contain significant heritage resources. In particular is Gum Springs, 19th century Free Black community. The Pride of Fairfax, a Masonic Lodge and Community Landmark for Gum Springs, is located at Tax Map Parcel 102-1 ((1)) 98. It should be evaluated for potential inclusion in the Inventory of Historic Sites. Additional survey work should be undertaken to locate and preserve significant heritage resources. Additionally, preservation of the Hollin Hills subdivision, listed in *The National Register of Historic Places*, is encouraged.

Any development or ground disturbance in this sector, both on private and public land, should be preceded by heritage resource studies, and alternatives should be explored for the avoidance, preservation or recovery of significant heritage resources that are found. In those areas where significant heritage resources have been recorded, an effort should be made to preserve them. If preservation is not feasible, then, in accordance with countywide objectives and policies as cited in the Heritage Resources section of the Policy Plan, the threatened resource should be thoroughly recorded and in the case of archaeological resources, the artifacts recovered."

The Comprehensive Plan also references the community of Gum Springs in other sections of the Plan. The Fairfax County Comprehensive Plan, 2017 Edition, Area IV, Richmond Highway Corridor Area, amended through 5-1-2018, Community Business Centers, beginning on page 118, states:

HYBLA VALLEY/GUM SPRINGS COMMUNITY BUSINESS CENTER

"The Hybla Valley and Gum Springs communities have rich heritages that includes both existing historical sites, historic or cultural remnants of the past, and major ecological resources. Of special significance, Gum Springs was founded in the 19th century as a Free Black community where noteworthy sites and buildings include the Pride of Fairfax Masonic Lodge, Bethlehem Baptist Church and a former baptismal site. Other memorable uses dating from the early twentieth century through the 1950s were located in Hybla Valley, including the Mount Vernon Drive-in Theatre and the George Washington Air Junction, an airport used for navel flight training during World War II. Additionally, there are remnants of early roadway alignments still in use today such as Fordson Road, which follows the original path of Route 1 and, prior to that, the alignment of the former Potomac Path."

...

Land Unit E: p. 140

Base plan:

Redevelopment should be done in accordance with the Gum Springs Redevelopment Plan, adopted by the Board of Supervisors on April 16, 1990. The heritage resources within the historic community of Gum Springs should be protected in all development proposals.

...

The Gum Springs Redevelopment Plan area is planned for residential development at 5-8 dwelling units per acre and for office and commercial uses along the Richmond Highway frontage. Residential development at 16-20 dwelling units per acre and a reconfiguration of the strip commercial areas into areas of office and/or retail uses may be appropriate, if the following land use and transportation conditions are met:

...

New development is sensitive to the existing institutional and residential uses, which have long-standing ties to the Gum Springs Community, and effective measures should be taken to protect these institutional uses from any adverse impacts generated by adjacent higher intensity residential, office or retail development through a combination of architectural and landscaping techniques;

For the sites recognized in the Comprehensive Plan as historic and near to the proposed APE, staff recommends that avoidance be the primary goal. However, if that is not feasible, staff recommends that the sites be documented, through photographic and/or measured drawings, and surveyed for their architectural, landscape, archaeological values if planned to be demolished. For sites that are already denoted as demolished, staff recommends that the Archaeological Collections Branch of the Fairfax County Park Authority be consulted for further analysis.

ATTACHMENT 2

Fairfax County Architectural Review Board Comments

Historic Architectural Survey, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722

Consolidated by Laura Arseneau, Architectural Review Board Staff, Dept. of Planning and Zoning
May 21, 2019

Jason Sutphin
Architectural Review Board (ARB) Member
April 29, 2019

I greatly appreciate the opportunity for the ARB to convey information on this document, and really commend what seems like a proactive approach that is being taken to collaborate. Others know the Route 1 stretch far better than I, but I do offer some high-level thoughts:

1. The map on page 4 shows the boundary of the APE. How was this APE boundary selected, and how would it correlate to primary and secondary impacts from physical improvements associated with the BRT project? That boundary overlaid on the project's map would be useful to know if it is adequate. For example, would there be any new roads or intersections, intersection improvements, pedestrian improvements, utility upgrades, or similar items that would require site disturbance or impacts on properties not identified? It is difficult to review the APE limits without knowing this information. Having a 30% plan of Limits of Disturbance that has the APE transposed on it would be beneficial.
2. 3.3 on page 22 relays that criteria consideration G may have been the only criteria item used for evaluation. If true, this could potentially miss out on any resources that may meet the other criteria. Again, I am not as familiar with this stretch of road can cannot claim that there are any properties meeting the other criteria.
3. I would recommend maps that include the County HODs and NR register districts and properties.
4. The map on page 2 is not too clear, it is uncertain if the project goes as far as Pohick Church, although the map on page 4 is a bit clearer and appears to stop just short of Pohick Church. It is noted that Pohick Church is not included in the study and that's why the question is raised.

5. There is no reference to the County inventory. Was it consulted? Perhaps there are no identified resources.
6. How would the specific properties that are identified be impacted by the BRT project and its associated components? Again, seeing the APE and properties called out as an overlay to a 30% plan would be useful.

ATTACHMENT 3

Fairfax County History Commission Comments

Historic Architectural Survey, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia; DHR Project No. 2018-0722

Consolidated by Denice Dressel, History Commission Liaison, Department of Planning and Zoning
May 20, 2019

Glenn Fatzinger
Mount Vernon District
Secretary, Fairfax County History Commission
May 2, 2019

After reviewing the bus rapid transit plan for the Richmond Highway Corridor, two items require further study:

The impact of the proposal on the Gum Springs Community, especially the Spring Garden Apartments along Route 1 across from COSTCO. Widening the highway would result in demolishing important residential facilities that are part of the Gum Springs Community.

The historical plaques in the wall at the corner of the COSTCO facility is a very attractive marker of the former Hybla Flying Field that existed on that site in the 1920s and 1930s and that plaque/marker would need to be replaced

Jordan Tannenbaum, Esq.
Springfield District
Vice-Chair, Fairfax County History Commission
May 5, 2019

I have reviewed the Historic Architectural Survey Technical Report(Report) for the above project and have the following comments, some of which, per our discussion at the recent Commission, could be included in the joint comments from the Commission.

As discussed at our meeting, the fact that Gum Springs was not included in the Report should be raised. I do not pretend to be familiar with the project area- that is why I copied Sally, Anne and Glenn- however, I seem to recall from several history conferences that the Hybla Valley

was an area settled by free Blacks and this fact, in general and Gum Springs, in particular, does not appear in the report.

In that same vein, I am aware that Route 1 was the principal north-south highway on the East Coast before construction of I-95. I went on a tour of highway architecture a number of years of the section included in the BRT project, and recall that a number of early hotels and gas stations were still extant at that time. They may have been demolished in the intervening years but I would like to see the dates of construction of the properties listed in Appendices A and B of the Report.

Sally Lyons
Mount Vernon District
Fairfax County History Commissioner
May 17, 2019

So many properties have been included in this survey that it is very difficult to research and verify the conclusions that have been reached by DHR. Historians and citizens will ultimately need more time to evaluate the results of this study.

It would be better if all the items included date of construction.

One point of confusion that I immediately spotted was the case of Johnny Mac's North Carolina Barbecue, 8526 Richmond Hwy. This has been lumped in with 029-6137, Skyview Park Plaza, declared not eligible. According to the county windshield survey, No. 23, this structure was built in 1959. If it is truly a classic 50's ice cream drive-in, it deserves a second look. It is certainly an irreplaceable neighborhood landmark.

At the Mount Vernon Regional Historical Society start-up board meeting the question was raised concerning structures that mimic George Washington's Mount Vernon that were created for the tourist trade related to Mount Vernon, and which therefore have special historical architectural significance in this area. Particularly mentioned was what is now a Wells Fargo Bank, at 8770 Richmond Hwy., 029-6156. The structure is listed as not eligible. I am attaching as part of my comments those sent to me by Tammy Mannarino, historian, and secretary of MVRHS, which include a more detailed discussion of this issue, and its significance at a national level.

It was also discussed that not immediately available to us without further research are the unique historical aspects of many buildings, the events and prominent individuals associated with them.

I concur with Ron Chase concerning impacts on Gum Springs, and the importance of protecting the surviving historic resources of this African American settlement, which was

founded by former slaves of George Washington and became a thriving community. These resources are endangered and must not be lost.

For the future in evaluating possible mitigation, I was reminded by a business owner within the corridor that the preservation of a structure from road construction does not guarantee its survival. For instance, an adequate parking lot is essential for a drive-in restaurant, or any automobile garage, which cannot survive without one.

I am struggling with the potential eradication of so many structures (built over 50 years ago) that constitute the aggregate environment of a historic highway. (Not to mention the non-historical aspects of the loss of so many small, often family-owned, businesses, and necessary services for residents of Mount Vernon and Lee Districts). As an aside, I can't help wondering if such a massive widening is necessary for the corridor in light of rapidly expanding technology for driverless vehicles, which promises to greatly enhance dense, smooth traffic flow on major corridors. With the advent of the Army Museum, it is also likely that Metro will ultimately be extended to Fort Belvoir.

Comments received from Tammy Mannarino, Secretary, Mount Vernon Regional Historical Society on the Richmond Highway Bus Rapid Transit Project Historic Architectural Survey Technical Report, and included in Sallie Lyons' comments of May 17, 2019:

In general, I feel like there are many properties that haven't been thoroughly researched or evaluated. The responsibility for this does not lie completely at the doorstep of the writers of this report. As a community we have been far more concerned with George Washington, the Mount Vernon Estate and Old Town Alexandria. Only recently have we been paying attention to the airfields on Route 1, Fort Hunt Park, and other significant sites in our area. It would be extremely beneficial for our community if we could have additional time to research our history to make a true evaluation of what would be lost here. Some things that I noticed in skimming the report.

p.26 Woodlawn Methodist Church 7730 is listed as Not Evaluated and then Not Eligible.

Comment: I'm not sure how it was determined that it isn't Eligible without evaluation. This is the church that received a new state historic marker in 2017. It is historically connected to the Woodlawn congregation of the 1860s. The congregation moved to Gum Springs and the Holland family purchased the land for the church from Dan Ford. The current building was completed in 1941 and reportedly contains some remnants of the early church (the Bell and wood around pulpit.) The church history is kept in the rare books section of the Virginia Room. https://www.dhr.virginia.gov/pdf_files/PressReleases/122917_Markers_press_release.html

p.A-5 Mount Vernon Antique Center 8101 Richmond Highway

Comment: The antique center was demolished by fire on Christmas Day 2017. Given that this study is dated April 2019, this contributes to my overall impression that the report is not as thorough and accurate as we would like. I'll have to check photos in Patrick O'Neill's book Mount Vernon, but I think this intersection may have been the site of a military encampment.

p. A-7 Holly Woods and Vines 8453 Richmond Highway

Comment: I am not familiar with the structures at this location, but Mike Bohn in his book Mount Vernon Revisited traces the old Potomac Path through the property lines in this area. He points out remnants of the "Pincushion road" that George Washington documented in his diaries. The route can clearly be seen on Google maps. It runs behind Holly Woods and Vines and intersects with Route 1 just past Agnew. It is possible that there is some trace through this area. Has this been researched during this survey?

p. A-8 Wells Fargo 8770 Richmond Highway.

Comment: This structure was built in 1941 as a single family home. It is significant because it was built as a replica of George Washington's Mount Vernon a few miles away. This is an excellent example of a nation-wide trend documented in Lydia Mattice Brandt's book, First in the Homes of His Countrymen: George Washington's Mount Vernon in the American Imagination. A longtime volunteer at Mount Vernon has indicated to me that the MVLA has begun tracking homes and businesses around the country that were part of this trend. I am following up with Craig Bauman the lawyer and long time Mount Vernon resident who leases space upstairs and is familiar with the history of the building. 8368 Richmond Highway is a lesser example of the same trend.

Additional note:

7622 Richmond Highway. This is the Five Guys at the intersection of Quander Rd. While the building probably dates to the mid 1980s, I believe that it sits on the footprint of the Spring Bank Colored School. In general, we need more documentation on the schools in our area. It is possible that there are other school sites along the Route 1 corridor that have not been noted.

Laura van Opstal

From: Birge-wilson, Adrienne <adrienne.birge-wilson@dhr.virginia.gov>
Sent: Wednesday, May 5, 2021 2:19 PM
To: Miller, Douglas
Cc: Ross Bradford; epaden@delawarenation-nsn.gov; Byron, Barbara A.; gshsfcva@gmail.com; Chris Barbuschak; kenneth.k.bansah.civ@mail.mil; Anissa Brown; Martha Catlin; Crowell, Elizabeth A; Aguayo, Vanessa; Koenig, Daniel (FTA); Haas, Shauna (FTA); Sari E. Rothrock; Eric Almquist; Laura van Opstal; Arseneau, Laura; Brannan, Nicole; kgallotta@scf-llc.com
Subject: Re: Fairfax County Richmond Highway Bus Rapid Transit (RHBRT) - Section 106 Consultation

DHR acknowledges receipt of this letter. We look forward to reviewing the additional station design information and design and locations of noise walls. Please keep DHR informed of the continuing consultation with the National Trust for Historic Preservation and efforts to resolve their objection.

V/R,

Adrienne Birge-Wilson

Review and Compliance Division
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221
(804) 482-6092
adrienne.birge-wilson@dhr.virginia.gov

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On Fri, Apr 30, 2021 at 3:06 PM Miller, Douglas <Douglas.Miller3@fairfaxcounty.gov> wrote:

Good afternoon,

Attached please find Section 106 correspondence for the Fairfax County Richmond Highway Bus Rapid Transit Project. The letter provides information regarding the project's Section 106 process, including acceptance of DHR's conditional concurrence. It also provides responses to Consulting Party comments received by the February 22, 2021 deadline.

Thank you for your participation in the Section 106 process.

Regards,
Doug

Douglas C. Miller | Transportation Planner IV | Fairfax County Department of Transportation | 4050 Legato Road | Suite 400 | Fairfax, VA 22033-2895 | 703-877-5750 | douglas.miller3@fairfaxcounty.gov



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1835 Market Street
Suite 1910
Philadelphia, PA 19103
215-656-7100

June 25, 2021

Mr. Ross M. Bradford
Deputy General Counsel
National Trust for Historic Preservation
2600 Virginia Avenue NW Suite 1100
Washington, DC 20037

Re: National Trust for Historic Preservation Response to Section 106 Historic Architectural Effects Assessment Technical Report, Richmond Highway Bus Rapid Transit Project, Fairfax County, Virginia

Dear Mr. Bradford:

This letter is in response to the National Trust for Historic Preservation's (NTHP's) letter dated February 22, 2021, objecting to the Section 106 effects determination and requesting further consultation pursuant to 36 CFR 800.5(c)(2)(i). This letter memorializes the continued consultation with NTHP during a March 10, 2021 video conference between the Federal Transit Administration (FTA), the Fairfax County Department of Transportation (FCDOT), and NTHP. This response letter provides additional detail on avoidance and minimization efforts to date and commitments for continued coordination and minimization for the Richmond Highway Bus Rapid Transit (BRT) Project (Project).

FTA and FCDOT acknowledge the NTHP's support for the Project and that NTHP provided comments at design coordination meetings between NTHP and FCDOT on December 17, 2018; March 12, 2019; and June 11, 2020. NTHP also provided comments on the Project and potential effects to historic properties following the April 16, 2020 Consulting Party meeting. Comments from NTHP primarily focused on process-based concerns and were addressed through correspondence dated August 13, 2020 (which contained itemized responses to comments and a memorandum detailing assumptions regarding Gum Springs as a historic district) and through continuing design coordination meetings with NTHP outside of the Section 106 process as described above.

On January 15, 2021, FTA and FCDOT provided the *Historic Architectural Effects Assessment Technical Report* (Effects Assessment) to DHR and the Section 106 Consulting Parties, including NTHP. In that report, FTA and FCDOT determined the project would have no adverse effect to Woodlawn Plantation (DHR No. 029-0056) and Woodlawn Cultural Landscape Historic District (DHR No. 029-5181), hereinafter referred to as "Woodlawn" and "Woodlawn Cultural

Landscape,” respectively, as the Project would not alter, directly or indirectly, any of the characteristics of the historic property that qualify it for inclusion in the National Register of Historic Places in a manner that would diminish the property’s significant aspects of integrity, in accordance with 36 CFR 800.5(a)(1). While minor widening and construction of new median would occur within the boundary of Woodlawn and the Woodlawn Cultural Landscape, the work takes place along an existing transportation corridor and would not result in alteration, damage or destruction to contributing elements of the historic property, nor would it change the character of the property’s setting or association. Proposed improvements extend south from Richmond Highway/US Route 1, outside the boundary of the National Historic Landmark (NHL) and away from the core of this historic property where the contributing elements are located. Adverse visual effects would not occur, as the completed project will appear substantially the same as existing conditions.

In a letter dated February 17, 2021, DHR concurred with the Effects Assessment and FTA’s findings with the condition that the Project design for BRT stations and potential noise walls be provided to DHR prior to finalization and construction. On April 30, 2021, FCDOT acknowledged DHR’s conditional concurrence with FTA’s no adverse effect determination and agreed to continued coordination at designated milestones.

The following responds to Section 106 concerns raised by NTHP in the letter and at the March 11, 2021 meeting. Detailed responses to design concerns brought forth by NTHP are provided in the enclosed *Design and Constraints at Woodlawn Plantation and Cultural Landscape* technical memorandum. With respect to Section 4(f) comments, FTA intends to make a *de minimis* impact determination pursuant to 23 CFR 774.3(b) for the Woodlawn and Woodlawn Cultural Landscape historic properties based on DHR’s concurrence with FTA’s no adverse effect determination. Therefore, consideration of feasible and prudent avoidance alternatives is not required.

- 1) NTHP noted that the Federal Highway Administration (FHWA) Eastern Federal Lands Highway Division (EFLHD) Project already made accommodations for future BRT, and stated that the Effects Assessment did not accurately describe the FHWA EFLHD project consultation, particularly with respect to the 184.5-foot right-of-way (ROW) at Woodlawn.

FHWA was the lead federal agency for the EFLHD Project completed in January 2018; as FTA was not involved, FTA and FCDOT appreciate the additional information on the project consultation and clarification of the agreed-upon ROW. FCDOT acknowledges and appreciates NTHP’s provision of additional information about utility pole locations, the ROW and easements resulting from the EFLHD project, and the Dominion Energy easement on NTHP’s Woodlawn property, via email on March 11, 2021. FCDOT acknowledges the previous agreement between NTHP and Dominion Energy and intends to move forward in a similar manner, as described in item 2 below.

While the EFLHD project stated that it would make accommodations for future transit enhancements in the planned median, the ROW obtained by VDOT from Woodlawn did not provide the necessary space in the median to accommodate this project. The EFLHD project, and the 184.5-foot ROW shown in the resultant Programmatic Agreement drawings, were used to help guide initial design for the Richmond Highway BRT Project. However, discussion of the EFLHD project and the ROW required was not a determining factor in the no adverse effect finding for this FTA undertaking. As noted above, the two additional feet of ROW required does not include physical alteration of contributing features and the acquisition and easement will not alter the character or appearance of the property in a manner that diminishes the integrity of design, materials, workmanship, feeling, association or setting.

- 2) NTHP expressed concern about the permanent utility easement on the Woodlawn property, proposed utility pole location, and relocation of the existing fences belonging to NTHP.

The requirements related to the utility easement and locations of utility poles and fencing is further addressed in the attached memo from FCDOT. To address NTHP's concerns, FTA will ensure FCDOT commits to seek ways to minimize permanent impacts to Woodlawn, including fence relocation, within the requirements set forth by the utility provider (Dominion Energy). FCDOT commits to continue coordination with Dominion Energy on ways to reduce the easement and to provide NTHP, as an adjacent property owner, an opportunity to review Project design. Please note that unlike FHWA, FTA does not retain design review authority and FTA is dependent on our recipients as project sponsor to fulfill satisfactory design reviews in accordance with applicable design standards and stakeholder agencies. Therefore, FCDOT is the entity ultimately responsible for design and not FTA.

In its efforts to continue coordination with Dominion Energy, FCDOT met with Dominion Energy on April 28, 2021 and discussed the proposed permanent utility easement on the Woodlawn property, including the existing agreement Dominion Energy has with NTHP. Dominion Energy requires a 30-foot easement centered on the utility pole line. However, Dominion stated in an email that while the 15-foot permanent utility easement remains necessary on NTHP property (Woodlawn), the fence would be allowed alongside the poles as long as access is maintained from the Richmond Highway ROW and the fence does not interfere with the ability to work on the poles. Thus, the fence would be relocated closer to the poles than stated at the meeting on March 10, 2021. FCDOT will continue coordination with Dominion Energy to further confirm locations of poles and the relocated fence and will continue to correspond and coordinate with NTHP as more details are provided.

- 3) NTHP requested information about minimization efforts and expressed concern about future design changes resulting in stormwater management facilities on the Woodlawn property.

Avoidance and minimization efforts made to date include reduction of the roadway section width through pursuit of a design waiver for elimination of the right-turn lane, instead combining it with the right-most through-lane, and a narrower typical section at Woodlawn and Woodlawn Cultural Landscape compared to the typical section in the County's comprehensive plan (see attached memo). FCDOT commits to installing no new stormwater management infrastructure on the property; either existing infrastructure will be utilized, or stormwater requirements will be managed within the existing VDOT ROW.

The Project is currently at 30% design, which is typical of transportation projects during the Section 106 and NEPA phase. At this point in design, potential ROW impacts are conservative and assume the greatest amount of disturbance expected. FCDOT commits to only take the amount of ROW necessary for the Project from the NTHP's Woodlawn property, and to continue to explore options with the utility provider that may minimize impacts. FCDOT anticipates a more detailed understanding of ROW impacts around 60 percent design, in early 2022. FCDOT commits to restore the land to a condition as close as possible to the existing condition. Access to the easement would be from the ROW only and not through NTHP Woodlawn property. FCDOT will coordinate with NTHP regarding fence replacement; fencing will be salvaged and moved or replaced in-kind.

FCDOT is pursuing traditional design-bid-build with this project, so the design team that has been working with NTHP will continue through final design and construction, alleviating potential concerns about commitments being lost during future phases of design and eventual construction. As noted in the attached minutes from the March 10, 2021 meeting, FCDOT will be coordinating with Dominion Power and other utilities during summer 2021, and subsequent to those meetings, FCDOT will hold a meeting with NTHP to discuss utility ROW disturbance. FCDOT proposes semi-annual coordination meetings with NTHP going forward to address ROW concerns, coordination with utilities, and potential impacts to Woodlawn. These meetings would begin in fall 2021 and would be led by FCDOT as the project sponsor and would continue through certain aspects of construction.

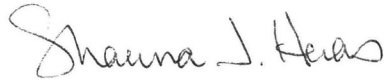
This letter memorializes the commitments of FCDOT as the project sponsor, in coordination with FTA, to make all efforts to minimize impacts to Woodlawn and the Woodlawn Cultural Landscape, and to continue coordination with NTHP during the design process. The minimization and commitments discussed in this letter and the attached memorandum aim to resolve NTHP's objection. FTA and FCDOT appreciate the NTHP's support for the Project and coordination efforts thus far and look forward to NTHP's confirmation that these commitments resolve their objection.

June 25, 2021
Mr. Ross Bradford

Page 5

If you have questions or concerns, please contact Mr. Daniel Koenig at Daniel.Koenig@dot.gov.

Sincerely,

A handwritten signature in cursive script that reads "Shauna J. Haas".

Shauna Haas,
Environmental Protection Specialist

Enclosures:

- Meeting notes, 3/10/21
- Technical Memorandum: Design and Constraints at Woodlawn Plantation and Woodlawn Cultural Landscape Historic District

cc: Douglas C. Miller, Fairfax County Department of Transportation
Vanessa Aguayo T., Fairfax County Department of Transportation
Adrienne Birge-Wilson, Virginia Department of Historic Resources

Richmond Highway Bus Rapid Transit Project Section 106 – National Trust for Historic Preservation Meeting

DATE & TIME: March 10, 2021; 3:00 – 4:00 pm

LOCATION: Microsoft Teams

1. Introductions

This meeting was held to discuss the National Trust for Historic Preservation's (NTHP) February 22, 2021 letter formally objecting to the Federal Transit Administration's (FTA) January 12, 2021 Project Effects Determination Letter, which included a finding of no adverse effect for the undertaking at Woodlawn Plantation and the Woodlawn Cultural Landscape Historic District. The following were in attendance:

Name	Affiliation
Dan Koenig	FTA
Shauna Haas	FTA
Noah AnStraus	FTA
Vanessa Aguayo	Fairfax County Department of Transportation (FCDOT)
Doug Miller	FCDOT
Eric Almquist	Project Management Consultant (PMC)
Laura van Opstal	PMC
Allison Scott Berkheimer	PMC
Ross Bradford	NTHP

An FTA representative provided information about comments on the Effects Assessment received thus far. Aside from comments from NTHP, the Virginia Department of Historic Resources (DHR) provided conditional concurrence, and comments from three consulting parties (CPs) were received within the comment period. There were also comments received outside of the comment period and these will not be responded to unless they include substantive new information.

An FTA representative acknowledged the NTHP's formal objection and stated that their intention was to consult to resolve the objection and would respond to NTHP's Section 106 concerns in writing. Additionally, FCDOT will continue to engage NTHP in the larger project design effort as a property owner of a parcel adjacent to the project.

2. Federal Highway Administration (FHWA) Eastern Federal Lands Highway Division (EFLHD) Richmond Highway Improvements Project

In response to NTHP's comment regarding FHWA's determination of adverse effects for the Richmond Highway Improvement Project, an FTA representative stated that this was a different project led by a separate federal agency. NTHP representative noted that FHWA designed the Richmond Highway project to accommodate future transit projects like FCDOT's BRT project and that FHWA's determination of

adverse effects should still be relevant and informative to FTA in making its assessment under the BRT project.

3. Richmond Highway BRT Right-of-Way

The project team stated that the 184.5 feet of right-of-way (ROW) was not identified in the text of the Programmatic Agreement for the EFLHD project, but rather was measured from the scaled drawing attached to the PA. The ROW that VDOT ultimately acquired was not 184.5 feet. The team will no longer discuss whether the project is within the 184.5 feet.

The NTHP representative stated that he does not agree that the language used in the Effects Assessment accurately describes the ROW for the EFLHD Project because the Programmatic Agreement required FHWA to minimize the adverse effects of the undertaking on the Woodlawn Plantation through the consultation process. Through that process, the parties arrived at a much smaller roadway footprint, which was supposed to accommodate the BRT project. The NTHP representative also stated that he had made the same objection to FCDOT's characterization of the ROW for the EFLHD Project on other occasions in prior meetings.

4. Utility Easement

The project team shared a map, which showed the location of existing utility poles. The project team stated that the poles need to be placed outside the clear zone, or 6 feet from the face of the curb. Clear zone is measured from the edge of the right-most through-lane, so the clear zone can include a turn lane and a bike lane. The team is eliminating the right turn lane to minimize the total section width, which means that the clear zone is measured from the line between the bike lane and the right most through lane. This requires the poles to be behind the sidewalk, outside the clear zone. This follows AASHTO guidance for new construction. The NTHP representative asked about waivers under AASHTO and whether any had been sought and also whether other existing conditions along Route 1 could support placing the utility poles adjacent to the roadway.

The NTHP representative stated that the schematic shared at the June 2020 meeting was different than what was presented in the Effects Assessment. The project team stated that the 10-foot easement shown in the June 2020 meeting was made before discussing the issue with Dominion Energy, the utility provider, and that the provider requires 30 feet total centered on the utility pole. The NTHP representative stated that this past fall he had asked whether there were any updates about the project's impact to Woodlawn and that FDCOT/FTA reported that there were no changes.

The project team also addressed the relocation of the fence, which resulted from the utility provider requirement that the utility easement remain clear of fences, trees, or elements that could cause an arcing fire. NTHP stated that the schematic shared at the June 2020 meeting did not show this easement or the ROW, and that a permanent easement effectively removes the land from Woodlawn use and cannot even be used for pasture and that even minor encroachments into the historic district are significant effects under Section 106. The project team stated that the change between the schematic shown at June 2020 meeting and the schematic shown today is the difference between a 10-foot easement and a 14-foot easement. The NTHP representative countered that the difference is much greater than that because there was never any indication during the June 2020 meeting or thereafter that the utility easement's

encroachment into Woodlawn would result in placing fencing outside of the easement as opposed to inside the easement, which effectively widened the project much more than the +/- 2 feet that FCDOT/FTA had represented as being the impact of the project.

The NTHP representative stated that there was a significant disconnect between the representations made regarding the utility easement in June of 2020 and the Effects Assessment and that opportunities to address this issue should have been made before issuing the Effects Assessment. NTHP stated that the size and location of the utility easement is problematic and that FCDOT should diligently pursue waivers to reduce the impact to Woodlawn and that to date no coordination had occurred providing information regarding FCDOT's efforts.

The NTHP representative indicated that utility companies previously have permitted installation of structures like fences within their easements and that he would provide an example to FCDOT/FTA.

The project team will request that VDOT provide them with existing easement information.

5. Minimization

An FTA representative stated that the project team will continue coordination with NTHP through future design phases. Regarding the Section 106 process, FTA will not be completing an agreement document for the project, and DHR has concurred that the project will have no adverse effect to historic resources.

The NTHP representative stated that Woodlawn is in support of the project but that they had requested design information that was not provided before the effects report was written. The NTHP representative stated that he does not have confidence that NTHP will be given adequate time and consideration moving forward considering past coordination experience especially since current design plans are only at 30 percent. The NTHP representative was concerned that significant issues could change before the design plans were complete, and FTA would have consult with the NTHP about changes to the plans for purposes of Section 106. An FTA representative stated that it is common for NEPA and Section 106 to be done at 30 percent design, and that in instances where more details are needed, there are different processes for that, including commitments in the NEPA document. The FTA representative also reiterated that DHR has concurred that the project will have no adverse effect to historic resources, but the project team will continue coordination with NTHP through future design phases. The project team revealed that they were pursuing a design-bid-build procurement and the same design team that NTHP has been working with will continue through project delivery.

Design modifications pursued for the project so far include:

- A design waiver for elimination of the right-turn lane and to combine it with the right-most through-lane to reduce overall section width.
- Not implementing the comprehensive plan typical section (being implemented north of Jeff Todd Way), which would have a larger footprint.

No stormwater management facilities will be placed outside of VDOT ROW at Woodlawn. The project team anticipates signing a MOA to use existing ponds and purchase nutrient credits. If the right-turn lane waiver is not approved, stormwater management requirements would not change because it would not result in a significant enough increase in impermeable surface. The commitment to no stormwater

management impacts to the property will be memorialized in the NEPA process and construction bid documents.

6. Next Steps

Participants discussed next steps, including documenting commitments and lingering questions.

The NTHP representative stated that the comment summary in the Effects Assessment did not seem to reflect the June 2020 conversation with the NTHP. An FTA representative responded that the meetings with NTHP were stakeholder meetings, not Section 106 Consulting Party meetings. As a result, the information from those meetings was not included in the Section 106 documentation. The NTHP representative stated that he disagreed with the approach of keeping stakeholder and Consulting Party consultation separate and did not like the impression it made that NTHP had not opined about the effects of the project until submitting the objection letter.

Moving forward, FTA will respond to DHR and NTHP in writing to address concerns raised and include commitments to both parties for ongoing coordination on design. The June 2020 meeting notes will be referenced. The project team will work to only take what is necessary for the project, continue to explore options with the utility provider that may minimize impacts, and memorialize commitments in the NEPA process, FTA response letter, and the meeting notes.

The NTHP representative stated that NTHP would like to stay involved in the conversation and not have their concerns ignored and that their formal objection was intended to require additional ongoing consultation. The NTHP representative indicated that the NTHP welcomes receiving FTA's written response.

MEMORANDUM

Date: June 16, 2021

To: Ross Bradford, Deputy General Counsel, National Trust for Historic Preservation

From: Vanessa Aguayo, PE, BRT Project Manager, Fairfax County Department of Transportation

Subject: Design and Constraints at Woodlawn Plantation and Woodlawn Cultural Landscape Historic District

This technical memorandum documents design details and constraints for the Richmond Highway Bus Rapid Transit Project (“the project”) at Woodlawn Plantation (“Woodlawn”) and the Woodlawn Cultural Landscape Historic District (“Woodlawn Cultural Landscape”).

1. BACKGROUND

1.1 Project Background

The Fairfax County Department of Transportation (FCDOT), in coordination with the Federal Transit Administration (FTA) as the lead federal agency, is preparing documentation of compliance with the National Environmental Policy Act (NEPA) in accordance with FTA’s regulations (23 CFR §771.118). The proposed project involves the construction of a bus rapid transit (BRT) system along VA 241/North Kings Highway and US 1/Richmond Highway from the Washington Metropolitan Area Transit Authority (WMATA) Metrorail station at Huntington in the north to US Army Garrison Fort Belvoir in the south. The project would include the construction of new BRT-dedicated median lanes, nine BRT stations, roadway widening, streetscape improvements, and construction of sidewalks and bicycle facilities.

The project includes improvements along Richmond Highway at Woodlawn and through the Woodlawn Cultural Landscape. Project improvements would impact land adjacent to the northbound side of Richmond Highway.

1.2 Woodlawn Background

Woodlawn, owned and managed by the National Trust for Historic Preservation (NTHP), is located within the southern portion of the project, near the Richmond Highway/US Route 1 intersection with Jeff Todd Way/Mount Vernon Memorial Highway. The VLR and NRHP-listed property encompasses 128.8 acres, divided roughly in half by the Richmond Highway/US Route 1 corridor, and therefore contains land on both the north and south sides of the corridor. The resource is also a National Historic Landmark (NHL). The NHL boundary encompasses approximately 69 acres of the larger NRHP boundary and includes only land on the north side of Richmond Highway/US Route 1. Woodlawn also contributes to, and is encompassed within, the VLR and NRHP-listed Woodlawn Cultural Landscape.

MEMORANDUM

1.3 Meetings with NTHP

The project team has coordinated with NTHP as a property owner and as a Section 106 consulting party.

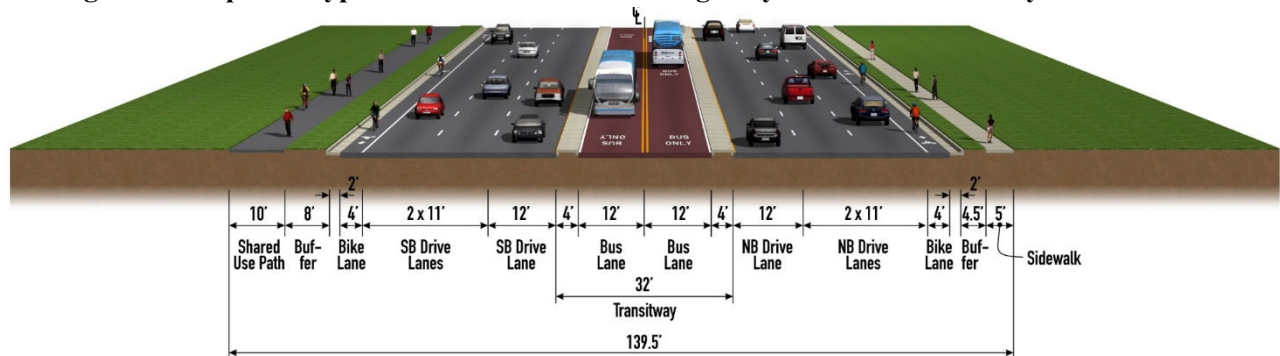
Design coordination meetings with NTHP occurred on December 17, 2018; March 12, 2019; and June 11, 2020. Summaries of past design coordination meetings can be found in **Section 5** of this memo. The notes from these meetings are contained in **Appendix B**.

Consulting Party meetings, which included all parties involved in the Section 106 process for the project, occurred on September 4, 2019 and April 16, 2020. A Section 106 meeting was held with NTHP and FTA on March 10, 2021 in response to the Trust's objection to the project's effects assessment. This meeting has also been summarized in **Section 5**.

1.4 Proposed Typical Section at Woodlawn

The proposed typical section for Richmond Highway at Woodlawn is shown in **Figure 1**.

Figure 1: Proposed Typical Section – Richmond Highway from Jeff Todd Way to Fort Belvoir



From Jeff Todd Way/Mount Vernon Memorial Highway to Fort Belvoir, new BRT-dedicated lanes would be constructed within the existing Richmond Highway median. This median was constructed as part of the Federal Highway Administration (FHWA) Eastern Federal Lands Highway Division (EFLHD) Route 1 Fort Belvoir project with the intention of accommodating future BRT. The existing median constructed under the EFLHD project varies between 32'-4' along the corridor. Large portions of the existing median are 32 feet, except near the intersection with Mount Vernon Memorial Highway/Jeff Todd Way, where the existing median is only 4 feet wide. The proposed transitway section for the BRT project would be 32 feet wide, with two 12-foot travel lanes, and two 4-foot buffers between the transitway and the general traffic lanes.

2. DESIGN CONSTRAINTS

Richmond Highway, or U.S. Route 1, is a National Highway System (NHS) route under FHWA jurisdiction. State departments of transportation (DOT), working through the American Association of State Highway and Transportation Officials (AASHTO), develop design standards, which are reviewed and formally adopted by FHWA for use on interstates and other major highways on the NHS. Design standards for highways are developed to optimize efficiency and safety and minimize cost and environmental damage. State DOTs must, at minimum, meet AASHTO requirements, but can develop design standards that are more restrictive than AASHTO requirements.

MEMORANDUM

2.1 Clear zone/Clear Roadside Concept for Arterial Roadways

Design standards for clear zones and lateral offsets are set by AASHTO guidance in the AASHTO Roadside Design Guide (RDG) 4th Edition, 2011, see below for further clarification on definitions. FHWA issued the 1st Edition of the RDG as guidance for states to use when developing their own state clear roadside policies and guidelines. In this case, Virginia DOT (VDOT) has their own requirements for clear roadside concepts which are described below and are more stringent than AASHTO.

2.1.1 AASHTO Roadside Design Guide 2011

The AASHTO RDG 2011 was referenced for minimum clearance requirements for applying the clear roadway concept. When feasible, the preferred design method for applying the clear road concept is to define the clear zone for the project. The clear zone is an area clear of obstructions that allows drivers to stop safely or regain control of a vehicle that has left the roadway. The width of the clear zone is based on risk, which is assessed through consideration of traffic volume, speed, and slopes. The clear zone, as defined in Table 3-1 of the RDG, for Richmond Highway is 20 feet. The clear zone is measured from the edge of the through travel lane to outside the roadway. Clear zones can include turn lanes and bike lanes in the width.

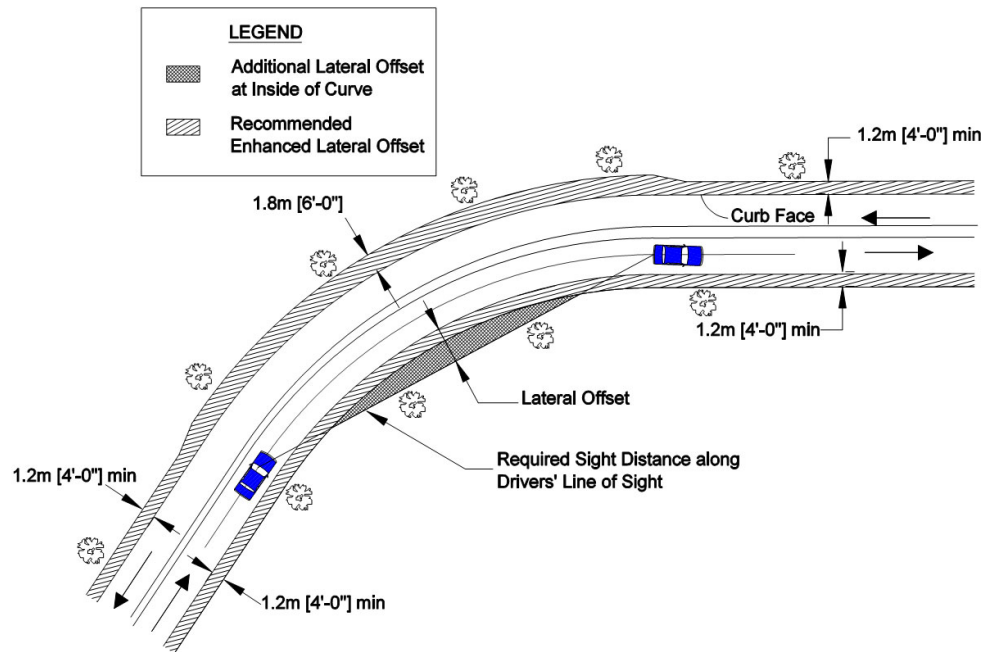
When designing urban arterial roadways, achieving the clear zone from Chapter 3 of the RDG is often not possible. When designers are faced with these obstacles, the RDG offers an alternate solution in Chapter 10 utilizing an enhanced lateral offset to fixed objects located behind curb and gutter as shown in **Figure 2**. The lateral offset is defined as the distance from the face of curb to the fixed object.

There is often confusion about how close to the roadway non-breakaway objects such as utility poles should be placed. The following excerpt from the RDG highlights this challenge.

Historically, the lateral distance value of 1.5 ft has been considered a minimum lateral distance for placing the edge of objects from the face of curb. This minimum lateral offset was never intended to represent an acceptable safety design criteria, though sometimes it has been misinterpreted as such. Research has shown that in an urban environment, approximately 80 percent of roadside crashes involved an object with a lateral offset from the curb face equal to or less than 4 ft... As Figure 10-1 illustrates, a recommended goal is to achieve at least 6-ft lateral offset from the face of the curb at these outside-of-curve locations while maintaining at least a 4-ft lateral offset elsewhere.

MEMORANDUM

Figure 2: AASHTO 10-1 Lateral Offset Design Guidance



Lateral offsets are not intended to constitute a clear zone. They are intended to provide a roadside environment that is not likely to have an adverse effect on motorists using the roadway.¹

Chapter 10 of the RDG Section 10.2.2.3.1 specifically discusses utility poles. This section notes that utility poles can pose a substantial hazard to errant vehicles and motorists.² It also notes that utility poles are second only to trees as the object associated with the greatest number of fixed-object fatalities. Guidance in this section suggests placing the utility pole “as far as possible from the active travel lanes.”

2.1.2 VDOT Road Design Manual (RDM)

The VDOT RDM also provides guidance on clear zones for urban arterial roadways in Appendix A, Section A-2. The paragraph below is an excerpt from the RDM that provides guidance for meeting clear roadside practices along urban arterial roadways.

When providing clear zone in accordance with the AASHTO Roadside Design Guide in an urban area is not practical, consideration should be given to incorporating as many clear-zone concepts as practical. Ideally, appurtenances (e.g. benches, trash barrels, bicycle racks) should be located as far away as practical, but at least 4 feet from the face of curb. Breakaway designs shall be used for poles and appurtenances located less than 6 feet from the face of curb. See Figure A-2-1, Case 2.

¹ <https://www.fhwa.dot.gov/programadmin/clearzone.cfm>

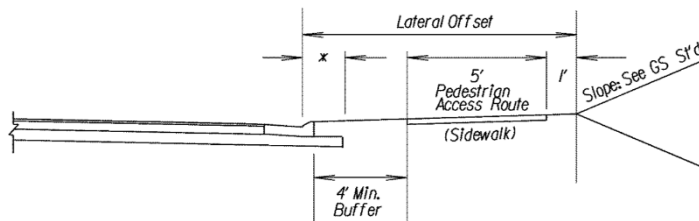
² AASHTO Roadside Design Guide, 4th Edition 2011

MEMORANDUM

Figure 3 shows VDOT A-2-1 Case 2. In this case, the lateral offset is dimensioned to the hinge point of a slope behind the sidewalk, not the fixed object.

Figure 3: VDOT A-2-1 Case 2 Offset Design Guidance

** 15' Minimum Lateral Offset in Constrained Low-Speed Urban Environments.*



2.2 Utility easement

The utility easement requirement for the project is 30 feet centered on the utility pole and is dictated by the utility provider (Dominion Energy) per conversations with utility coordination consultant to FCDOT, Rinker Design Associates (RDA). The utility easement must accommodate the full width of the utility pole cross arms for maintenance and repairs. Typically, Dominion requires the easement to be clear to eliminate infrastructure being placed directly adjacent to the poles and lines, as anything placed within the easement could pose a safety hazard or obstruct their ability to maintain the overhead lines. The 30-foot width is to clear trees to stop threat of fire from arcing and storm damage from branches.

The location of the proposed utility poles must meet VDOT standards prescribed in the VDOT RDM and AASHTO RDG as described in **Section 2.1** of this memorandum. These requirements cannot be waived as they relate to the safety of the corridor. The utility poles under new construction should be placed outside the clear zone; when that is not feasible, the poles shall be placed in accordance with the lateral offset guidance presented in the VDOT RDM.

Under the proposed condition, where the project team is seeking to minimize permanent impacts along the corridor, the rightmost lane is converted from a dedicated right turn lane to a shared through/right turn lane. The existing condition contains a dedicated right turn lane because the roadway is transitioning from three through lanes to two through lanes at the Jeff Todd Way intersection. The clear zone in the existing condition is measured from the right edge of the rightmost through lane and includes the dedicated right turn lane and bike lane. Under the proposed condition, the clear zone is measured from the right edge of the shared through/right turn lane and includes the bike lane. Since placing the poles outside the 20-foot clear zone is not feasible under the proposed condition, the poles would be placed utilizing lateral offset guidance. Since the minimum sidewalk buffer is only four feet and the minimum lateral offset is 6 feet, the poles would need to be placed behind the proposed sidewalk (**Figure 1**).

Based on the specifications of the utility easement and the clear zone, the fence must be moved southeast onto the new permanent easement (**Appendix A**).

MEMORANDUM

3. MINIMIZATION EFFORTS

3.1 Minimization to Date

The project team looked at minimizing impacts by not implementing the comprehensive plan cross section for the Richmond Highway Corridor at this location. The comprehensive plan cross section includes a 9.5-foot landscape buffer, 8-foot-wide cycle track, 4-foot utility strip, and 6-foot sidewalk. The proposed cross section at Woodlawn currently includes a 4-foot wide on-road bike lane, 5-foot sidewalk, and landscape buffer. The Comprehensive Plan Cross Section (being used along the remainder of the corridor) and the Proposed Plan at Woodlawn (using a reduced cross section) are attached in **Appendix A**. The proposed cross section is narrower than the comprehensive plan section. This minimization amounts to a difference of approximately 0.4 acres.

The project team met with Dominion Energy on April 28, 2021 and continues coordination to minimize impacts on NTHP property. The utility provider committed to allowing the replacement fence within the Dominion utility easement as long as access is maintained from the Richmond Highway ROW and does not interfere with the ability to work on the poles. The fence will be relocated closer to the poles than shown at the March 10, 2021 meeting, although exact location is still being determined, and fencing will be salvaged and moved or replaced in-kind.

3.2 Minimization Being Pursued

At the preliminary planning stage of the BRT project, the roadway layout included 2 left turn lanes, 3 through lanes, a bike lane, and a right turn lane. The BRT project is pursuing a design waiver with VDOT to remove the right turn lane and combine it with the rightmost through lane. The design waiver is being pursued in an effort to minimize impacts throughout the corridor, including impacts to the Woodlawn Cultural Landscape and Woodlawn. The typical sections that have been shared with NTHP reflect the design assuming the waiver will be granted by VDOT, which is expected this fall.

3.3 Minimization to be Considered During Final Design

The project team may consider other typical section options during final design and will continue to explore options with the utility provider that may minimize impacts.

4. COMMITMENTS

Contractors are required to abide by commitments recorded in the NEPA documentation for the project. FCDOT is pursuing traditional design-bid-build with this project, so the same design team that has been working with NTHP will continue through final design, and therefore will be able to continue coordination directly with the NTHP.

4.1 Stormwater Management (SWM)

No SWM infrastructure will be installed on Woodlawn property; either existing infrastructure will be utilized or stormwater requirements will be managed within the existing VDOT ROW. This commitment will be recorded in the Richmond Highway BRT NEPA document. The existing VDOT ponds treat runoff from a very large drainage area and the increased impervious surface from the BRT lanes is only a fraction of the area being treated by the two existing wet ponds.

MEMORANDUM

4.2 Other Property Impacts

FCDOT will continue to seek ways to minimize permanent impacts to Woodlawn during detailed design and as part of the ROW acquisition process. This commitment will be made in the NEPA document and includes coordinating with Dominion Energy on ways to reduce the required utility easement as noted in **Section 3.3** of this memorandum.

5. SUMMARY OF PAST MEETINGS

Section 1.3 listed the meetings that NTHP has participated in for the project. **Appendix B** contains notes from NTHP meetings related to design coordination only.

At the December 2018 meeting, the project team provided an overview of the project and what was anticipated to occur at the Woodlawn property. NTHP indicated that they would scrutinize SWM needs. NTHP provided insight about its development plans at Woodlawn.

At the March 2019 meeting, the project team provided an update about the project status. Typical sections of the project at Woodlawn were provided to NTHP, which showed improvements within the 184.5-foot ROW. The project team confirmed that no new SWM ponds were being proposed on Woodlawn property. NTHP requested that FCDOT ensure that all potential easements and disturbances were evaluated and documented at that time so that FCDOT would not need to come back and request additional ROW. NTHP then provided an update about its development plans at Woodlawn.

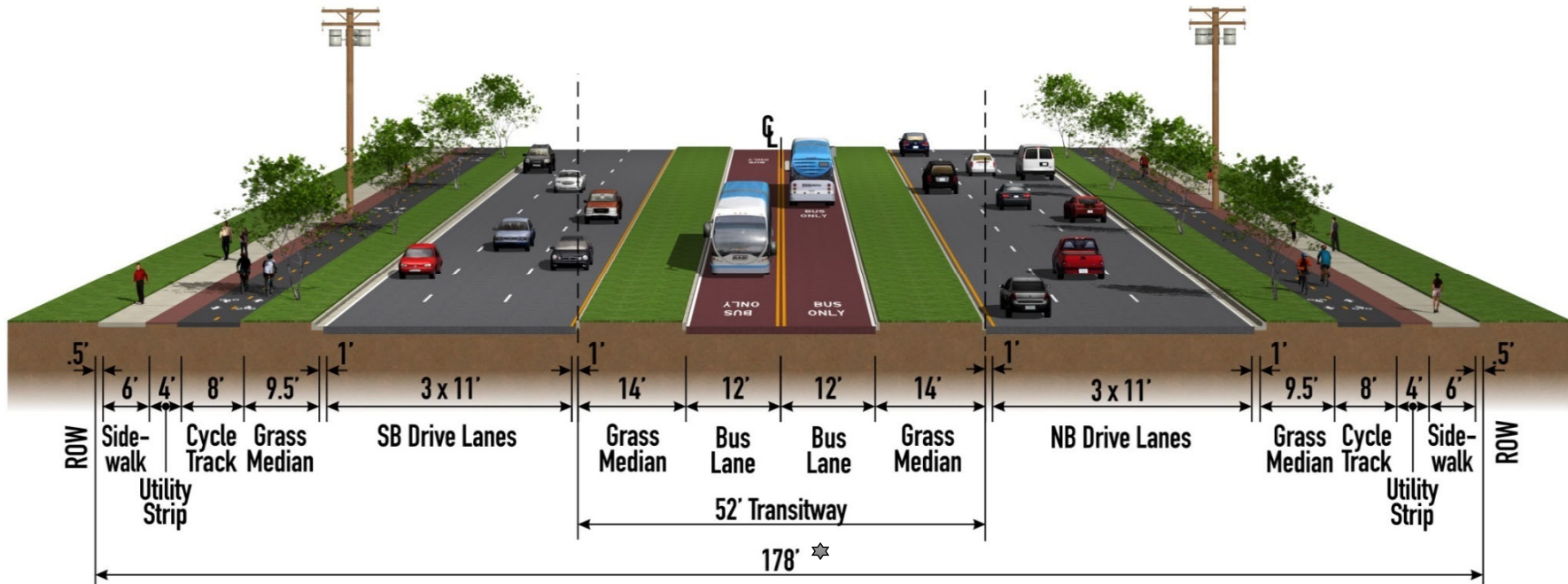
At the June 2020 meeting, the project team provided updated graphics showing potential impacts at Woodlawn. These graphics showed an additional two feet of ROW acquisition beyond that included in the VDOT ROW, 14 feet of permanent utility easement, and additional land for temporary construction easements. NTHP requested that FCDOT flag potential permanent and temporary easement lines in the field, provide them with detailed scale plans for additional ROW needs showing the location of the relocated fence, continue working to reduce potential permanent and temporary impacts to the Woodlawn property, and include commitments for ROW needs and minimization in the NEPA document. NTHP also requested that FCDOT complete construction efforts in front of the Woodlawn property as quickly as possible. The project team reiterated the commitment that SWM at Woodlawn would be directed to existing facilities. FTA was present at this meeting to follow up on Section 106 concerns following the Determination of Eligibility document review and responses to Consulting Party Comments.

At the March 2021 meeting, the project team addressed the NTHP objections to FTA's effects findings as stated in the February 22, 2021 letter from NTHP to FTA. Topics of discussion included the EFLHD Richmond Highway Improvements Project (how it was a different project led by a different agency), agreement to stop referencing the 184.5 feet the project team had assumed for ROW due to the EFLHD Richmond Highway Improvements Project, the utility easement and its anticipated effect on utility pole locations and fence placement, and minimization efforts (including design modifications and a commitment for no SWM facilities outside VDOT ROW at Woodlawn). NTHP requested that the notes of the June 2020 meeting show that the NTHP raised concerns at that time and that these notes be referenced in subsequent Section 106 correspondence.



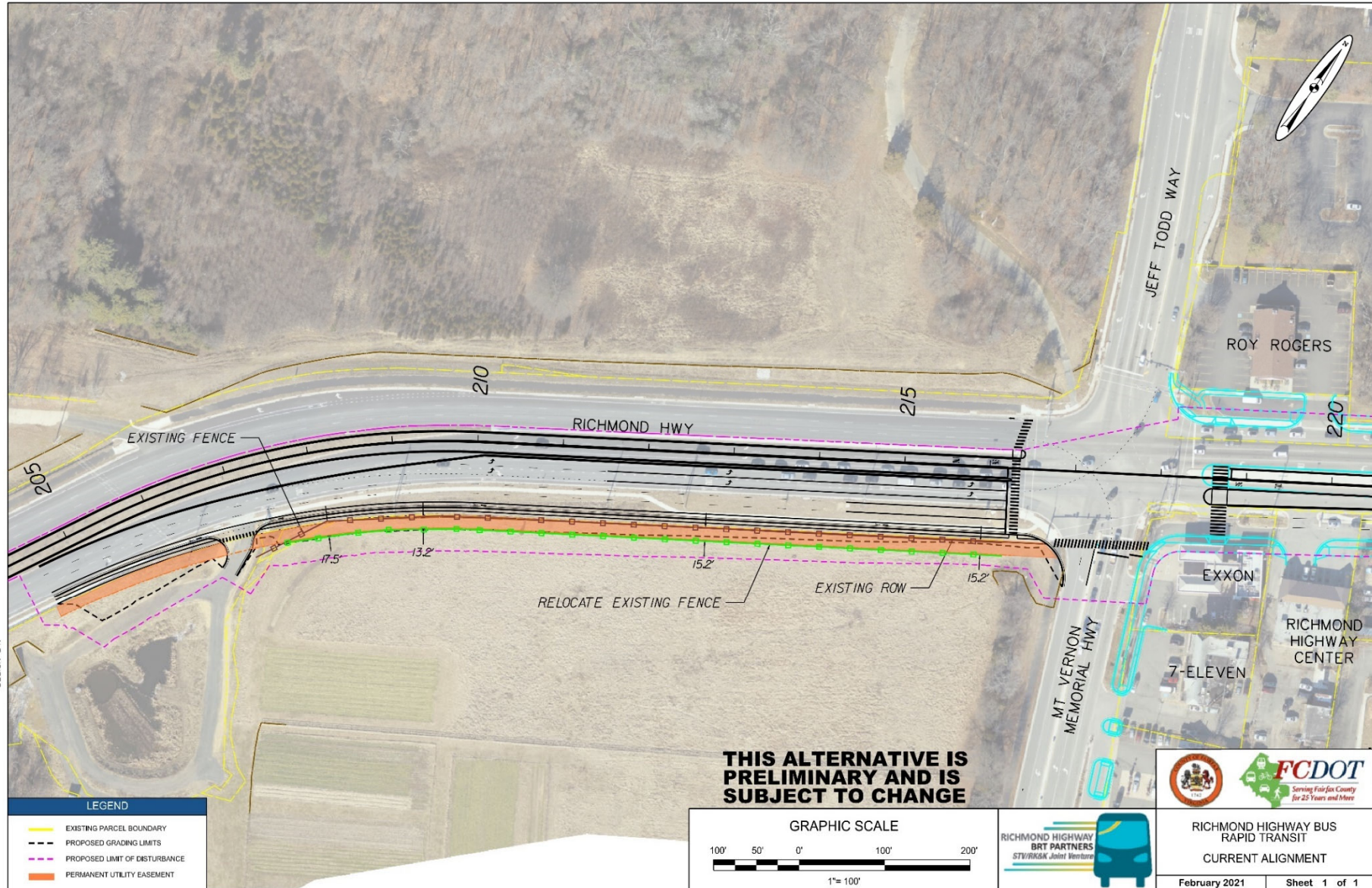
APPENDIX A – COMPREHENSIVE PLAN CROSS SECTION AND PROPOSED PLAN AT WOODLAWN

Comprehensive Plan Cross Section



*Note that this section only accommodates 1 left turn lane; the section at Woodlawn with double left turns would be 11 feet wider

Proposed Plan at Woodlawn (with Reduced Cross Section)





APPENDIX B - MEETING NOTES



Richmond Highway Bus Rapid Transit

DATE & TIME: December 17, 2018; 10:00 am – 12:00 pm

LOCATION: South County Government Center, Room 220

Meeting Goal: to provide project information and discuss options for future coordination.

7. Introductions

Name	Affiliation
Ross Bradford	National Trust for Historic Preservation (NTHP)
Katherine Malone-France	NTHP
Vanessa Aguayo	Fairfax County Department of Transportation (FCDOT)
Doug Miller	FCDOT
Eric Almquist	Project Management Consultant (RK&K)

8. Project Overview

Vanessa provided an overview of the Richmond Highway Bus Rapid Transit (BRT) Program. The group discussed past projects, including the Eastern Federal Lands Highway Division (EFLHD) projects, which resulted in relocation of Route 1 / Richmond Highway and the new alignment of Mulligan Road (Jeff Todd Way). NTHP was heavily involved in both efforts.

9. Richmond Highway Bus Rapid Transit Project at Woodlawn

- Ross Bradford noted that the realignment and widening of Route 1, which was developed through the EFLHD project, was assumed to include sufficient space for a median running BRT south of Jeff Todd Way. The Programmatic Agreement (PA) developed for that project assumed this space.
- Widening was generally assumed to go to the south side of Route 1, away from the National Historic Landmark portion of the Woodlawn property.
- The Route 1 widening negotiated for the EFLHD project did not include a “blank check” for the roadway typical section. Narrowed lanes and a curb and gutter system were included to minimize impacts to Woodlawn.
- EFLHD assumed that a large stormwater management (SWM) facility would be needed south of Route 1 on land currently used by the Arcadia Center. However, at some point during the project design phase, EFLHD determined that this facility was no longer needed.
- Ross stated that he was involved with both the original deed transfer from NTHP to VDOT and the corrective deed for removing the SWM facility.

- NTHP is generally in favor of bicycle / pedestrian facilities adjacent to the Woodlawn property, although they suggested that FCDOT minimize the amount of ROW required from Woodlawn property.
- The group discussed the width of the ROW that was negotiated in the EFLHD PA. Ross agreed that the PA would have included sufficient space for two left turn lanes, a dedicated right turn lane, and space for a median-running, two-lane BRT. The ROW width in the PA mapping was 184.5 feet, but the VDOT approved ROW is only 168.5 feet. FCDOT stated that 184.5 feet would better accommodate the median running BRT.
- Ross did not know why the width would have been reduced from 184.5 feet to 168.5 feet. He is going to check his files for the latest approved documents, and see what width was recorded.
- NTHP agreed that, because sufficient space for the median BRT was assumed in the PA negotiation, a typical section that includes the median BRT would be expected from FCDOT. If the additional widening of Route 1 from the BRT Program requires the ROW beyond the deeded 168.5 feet, property transfer would be required.
- If widening is needed between 168.5 feet and 184.5 feet, NTHP agrees that the minimization and mitigation for physical effects to Woodlawn would have already occurred and been addressed in the EFLHD PA. That said, NTHP requested that minimization to Woodlawn still be considered as part of the BRT design. NTHP will particularly scrutinize SWM needs.
- Any widening needed beyond 184.5 feet, including SWM, was not addressed in the PA.

10. Trust Development Plans at Woodlawn

NTHP is planning to expand the Woodlawn property with additional amenities including a light restaurant and meeting space. A request for special exception has been submitted to the Fairfax County planning office and will be reviewed by the Architectural Review Board. The improvements to the property may require roadway / access improvements that are yet to be determined.

11. Next Steps

- FTA will advance the Section 106 consultation.
- Ross will follow up with documentation confirming the recorded ROW width.

12. Adjourn



Richmond Highway Bus Rapid Transit

DATE & TIME: March 12, 2019; 9:30 am – 10:30 pm

LOCATION: South County Government Center, Room 217

Meeting Goal: to provide updated project information and discuss roadway design options at the Woodlawn property.

1. Introductions

Name	Affiliation
Ross Bradford	National Trust for Historic Preservation (NTHP)
Katherine Malone-France	NTHP
Vanessa Aguayo	Fairfax County Department of Transportation (FCDOT)
Doug Miller	FCDOT
Eric Almquist	Program Management Consultant (PMC)
Allison Scott Berkheimer	PMC

2. Project Status Update

- Vanessa provided an update on the current status of the project and activities that have taken place since the last meeting in December 2018. Specifically, it was noted that the project held a Public Information Meeting in late January and included maps that provided a Limit of Disturbance (LOD) for the entire corridor.

3. Recap of December Meeting / Woodlawn ROW Commitments

- Eric gave a brief recap of the December meeting noting that the realignment and widening of Route 1, which was developed through the Eastern Federal Lands Highway Division (EFLHD) project, was assumed to include sufficient space for a median running BRT south of Jeff Todd Way. The Programmatic Agreement (PA) developed in 2012 for that project assumed this space which was defined as a 32-foot median for BRT.
- The group discussed the width of the right-of-way (ROW) that was negotiated in the EFLHD PA and was actually acquired as part of the VDOT project. Based on Exhibit 6 from the PA, the ultimate “proposed ROW” included sufficient space for roadway through and turn lanes and space for a median-running, two-lane BRT. The ROW width in the PA mapping was scaled from the drawing to be approximately 184 feet. However, the limits of construction for the VDOT/EFLHD project, which was also identified in the PA mapping, were measured at approximately 168 feet. Subsequently, VDOT acquired a ROW of 168 feet. Given that the BRT project was not funded for construction at the time of the land acquisition, it is assumed that VDOT only acquired the ROW necessary to build their project but the agreed upon ROW impact line was 184-foot to accommodate the future BRT project.
- Eric noted that FTA has initiated Section 106 consultation with DHR and other consulting parties. FTA would be leading any future Section 106 discussions. The

intent of today's meeting is not to perform Section 106 consultation; rather, it is to clarify the results and commitments from previous studies and provide the Trust with advanced notice of FCDOT's proposed typical section. FTA will advance the Section 106 review of potential effects to Woodlawn.

4. Richmond Highway Bus Rapid Transit Project at Woodlawn

- Vanessa described the typical section print-outs that were handed out at the meeting. The two proposed options are described as the "Comprehensive Plan" section and the "Minimization" section. Everyone agreed that the Comprehensive Plan section was not worth pursuing due to impacts.
- The minimization option presented a proposed ROW width of 172 feet which is four feet beyond the 168 feet already acquired by VDOT. Allison noted that the main reason for this increase was the need for a larger refuge to accommodate a two-stage pedestrian crossing. It was noted that this was well within the 184-foot proposed ROW in the PA. There would likely be additional impacts beyond the ROW that would include temporary easements for construction and potential utility easements. In general, Katherine and Ross found the 172-foot typical section acceptable.
- Katherine and Ross asked about how stormwater management (SWM) was being handled as part of the BRT project. Allison noted that the PMC design team is currently working on a memorandum that supports the use of the existing SWM ponds and additional facilities within the public ROW. No new ponds are proposed on the Woodlawn property. Given the fact that VDOT previously proposed a pond on the southern portion of the Woodlawn property then determined later that they did not need it, there was skepticism as to how the existing ponds would also be able to capture the additional SWM from the BRT. As the design progresses these details will be shared.
- Ross asked FCDOT to ensure that all potential easements and disturbances are evaluated and documented now so that FCDOT is not put in the position of having to come back again to ask for additional ROW or easements. This will be taken into consideration in final development of the LOD for the CE.

5. Trust Development Plans at Woodlawn

- NTHP is planning to expand facilities at the Woodlawn property with additional amenities including a barn-style meeting venue. A request for a special exception has been submitted to the Fairfax County planning office and is still in process and under review by the Architectural Review Board. Ross stated that the improvements to the property may require roadway / access improvements along Mount Vernon Highway. Ross also noted that a traffic study has been performed and could be shared if the County did not already have it.

6. Next Steps

- NTHP will be receiving information as a consulting party in about six weeks as part of the Section 106 efforts.



Richmond Highway Bus Rapid Transit

DATE & TIME: June 11, 2020; 1:00 pm – 2:00 pm

LOCATION: Microsoft Teams – Virtual Meeting

Meeting Goal: to provide updated project information and discuss the current roadway design at the Woodlawn property.

13. Introductions

Name	Affiliation
Ross Bradford	National Trust for Historic Preservation (NTHP)
Vanessa Aguayo	Fairfax County Department of Transportation (FCDOT)
Doug Miller	FCDOT
Eric Almquist	Program Management Consultant (PMC)
Allison Scott Berkheimer	PMC
Matthew Bray	PMC
Daniel Koenig	Federal Transit Administration (FTA)
Shauna Haas	FTA

14. Project Status Update

- FCDOT (PMC) provided an updated design graphic showing the potential impacts to the Woodlawn property (see attached). The design showed the location of permanent impacts (associated with grading, fee simple property acquisition, and/or permanent utility easements) as well as temporary impacts (associated with temporary construction easements).
 - In general, the BRT project would need an additional 2 feet of fee simple right-of-way (ROW) from the Woodlawn property, beyond what is currently included in the VDOT ROW. This was presented in a proposed typical section (attached).
 - It is assumed that approximately 14 additional feet of Woodlawn property would be required to accommodate a permanent utility easement outside of the proposed VDOT ROW. This area would lie largely within the area needed for Route 1 improvements that was identified in the earlier Programmatic Agreement developed the Eastern Federal Lands Highway Division (discussed during previous meetings with NTHP).
 - The topography is generally flat in this area; therefore, there will be minimal additional ground disturbance required for grading beyond the proposed permanent right-of-way and easements. However, near the southwest end of the property, there are steeper roadway embankments where Route 1 crosses a stream.
 - Additional land would be needed for temporary construction easements. This area would vary depending on the amount of grading required, but could extend an additional 15 feet onto the Woodlawn property. The temporary easements would extend beyond the original area needed for Route 1 improvements that was identified in the earlier Programmatic Agreement. Land within the temporary easements would be returned to its current condition following construction, and

would retain ownership by the NTHP.

- FCDOT noted that the above stated impacts have not changed since the March 2019 meeting. These effects continue to be generally considered acceptable by NTHP. FCDOT noted that the forthcoming effects determination would likely find no adverse effect at the Woodlawn property.
- NTHP asked that, at some point during project development, FCDOT flag the potential permanent and temporary easement lines so that NTHP can see the location in the field. FCDOT agreed to consider how and when to best to do this. NTHP would also like to have detailed scale plans for additional ROW needs at the Woodlawn property. The plans should show the location of the relocated fence at the edge of the property along Route 1.
- As the design progresses, NTHP would like FCDOT to continue to evaluate ways to reduce the amount of potential permanent and temporary impacts to the Woodlawn property.
- NTHP asked that FCDOT's and FTA's commitments for ROW needs and minimizing impacts at the Woodlawn property should be clearly documented in the NEPA document and carried forward to future designers / contractors.
- NTHP noted concerns with construction equipment along Rt 1 for a long period of time, and asked FCDOT to complete the construction effort in front of the Woodlawn property as quickly as possible.
- FCDOT stated that all stormwater in this area would be directed to existing facilities; no additional stormwater facilities are needed on the Woodlawn property.
- FCDOT and NTHP agreed that the Section 106 effects assessment for the property should include the quantitative permanent / temporary impact values as well as a qualitative narrative of the effects.

15. Next Steps

- FCDOT will identify an appropriate timeframe for placing flags in the field and walking the proposed ROW lines with NTHP.
- NTHP will continue to be involved with Section 106 consultation.
- NTHP would like to see the latest design plans for Woodlawn prior to the next public meeting. September/October 2020 may be a good time to coordinate again.
- Plans at the next public meeting will show potential impacts and ROW needs at the Woodlawn property.



**National Trust *for*
Historic Preservation**
Save the past. Enrich the future.

October 1, 2021

Ms. Shauna J. Haas
1835 Market Street
Suite 1910
Philadelphia, PA 19103

**Re: Section 106 and Section 4(f) Project Effect Determination Response Letter
Dated June 25, 2021, Richmond Highway Bus Rapid Transit Project, DHR
Project No. 2018-0722**

Dear Ms. Haas:

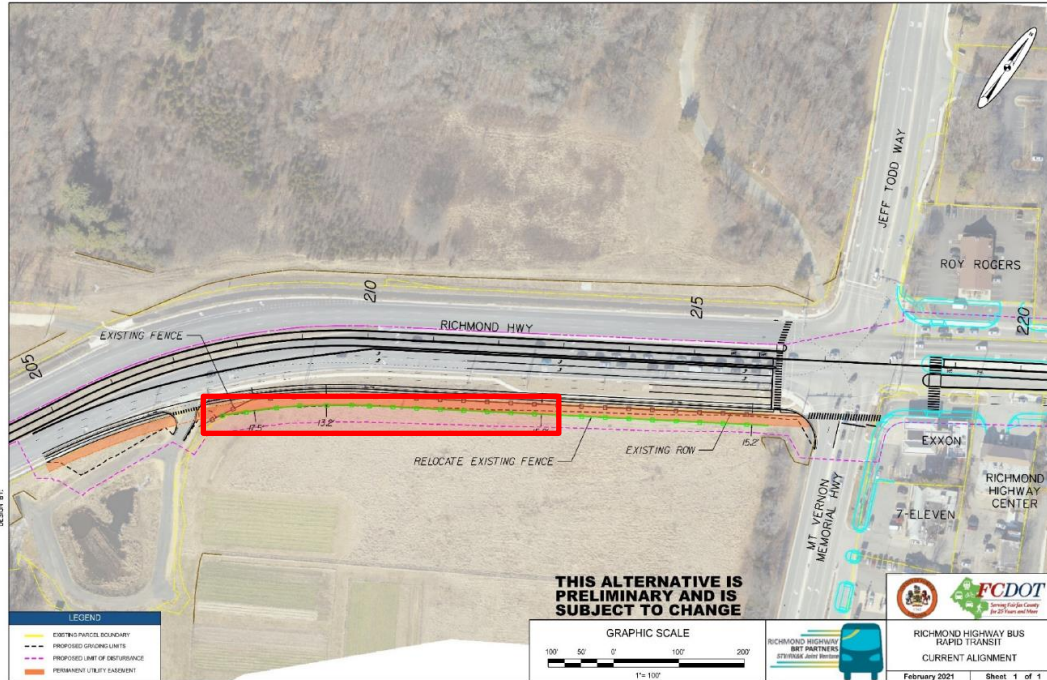
Thank you for your letter dated June 25, 2021 and the accompanying FCDOT memorandum which was in response to the National Trust's February 22, 2021 letter outlining our objection to FTA's Section 106 effects determination.

In general, the National Trust's concerns related to our objections have been resolved provided that the commitments made by FTA and FCDOT remain in place through the duration of this project. The National Trust appreciates the additional coordination made by FTA and FCDOT with utility providers and VDOT. FCDOT's memo indicated that additional coordination meetings utility providers should have occurred over the summer. Please provide any updates regarding those meetings.

While our objections have been substantively addressed it remains unclear how FTA's and FCDOT's future commitments and the minimization efforts made to date will be impacted if the design waiver from VDOT is not approved. Please provide any updates related to the status of the design waiver and provide a response addressing this unresolved issue.

We appreciate FCDOT's willingness to continue coordination meetings; however, in lieu of semi-annual coordination meetings, which appear to be too infrequent to provide adequate opportunities to address substantive design issues as they arise, the National Trust would request that FCDOT commit to quarterly coordination meetings and additional meetings in the event there are material changes to the design plans in the interim between quarterly updates.

As noted in FCDOT's memorandum, there was a commitment to flag potential permanent and temporary easements in the field; however, that never occurred. The National Trust requests that FTA and FCDOT provide a high resolution, detailed, and scaled site plan for this section depicting the parcel boundary, proposed grading limits, limit of disturbance, and permanent utility easement using a recent aerial imagery overlay (i.e., using an image taken in the last six months). While we understand that the designs are currently at 30% the limits of disturbance continue to be excessive in the Woodlawn Historic District, especially as shown below in the red shaded area of the site plan. Based on the existing design plans it appears that well over 100 feet of disturbance is planned in these areas. At this point in the process, we hope that FTA and FCDOT have refined the designs to more accurately reflect what parts of the Historic District will be disturbed in order to complete this section of the project.



Thank you for continuing to coordinate and consult with the National Trust regarding this project.

Sincerely,

Ross M. Bradford

Ross M. Bradford
Deputy General Counsel

cc:

Douglas C. Miller, Fairfax County Department of Transportation
Vanessa Aguayo T., Fairfax County Department of Transportation