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52-17

Mr. Roger Kirchen, Project Review Archaeologist
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, Virginia 23221

COL-0466

Dear Mr. Kirchen:

Re: Dominion Virginia Power, North Anna Power Station Unit 3 Archaeological and Architectural Surveys (Proposed 500 kV Transmission Line -- Louisa, Spotsylvania, and Caroline Counties, Virginia) VDHR File No.: 2009-0430

Enclosed for your review and concurrence are an archaeological survey report and an architectural survey report completed in support of the project referenced above. Dominion Virginia Power, pending state and federal regulatory approvals of a new generating unit at the North Anna Power Station, will need to construct an associated 500 kV transmission line from the North Anna Power Station to the Ladysmith switching substation in Caroline County. If built, the proposed transmission line, approximately 14.5 miles (23.3 kilometers) in length, would be constructed entirely within the existing right-of-way between the power station and the substation.

The architectural survey defined the Area of Potential Effects (APE) for the 500kV transmission line to include any architectural resources approximately 50 years or older within 0.5 mile (0.8 kilometer), on either side of the existing corridor centerline. Towers for the new line would be planned adjacent to the existing towers and are expected to be constructed with an increase in height no greater than 20 feet.

The archaeological survey (as part of a cultural resource survey) was conducted by Dominion's consultant, The Louis Berger Group, Inc. (Berger), and meet the Virginia Department of Historic Resources (VDHR) *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia*. The surveys also meet the National Historic Preservation Act and implementing regulatory requirements and standards.

The archaeological survey resulted in the identification of four previously unrecorded archaeological sites (identified in the report as 44CE0624, 44SP0616, 44SP0617, 44SP0618) and three artifact locations (AL4381-01, AL4381-02, and AL4381-03). Three of the newly recorded sites (44CE0624, 44SP0616, and 44SP0617) lack subsurface

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deposits and have low potential to contain significant archaeological information. As such, Berger recommends that these sites are not eligible for inclusion in the National Register of Historic Places (National Register).

Site 44SP0618, the presumed remains of a mid-nineteenth century structure, has potential to yield significant archaeological information relative to the Domestic, and possibly the Agriculture/Subsistence themes during the Antebellum Period (1830-1860) through Reconstruction and Growth (1865-1917) time periods in the Upper Coastal Plain region of Virginia. Berger recommends that Site 44SP0618 be avoided during any future development or modification of the transmission line corridor. If the site cannot be avoided, Berger recommends (1) additional archival research to determine if Site 44SP0618 is eligible for inclusion in the National Register under Criteria A or B; and (2) additional archaeological investigations be conducted to determine if Site 44SP0618 is eligible under Criterion D. (Criterion C was considered for this resource and found to be not applicable.)

Thirty-six previously unrecorded architectural resources were surveyed within the APE, the majority of which were examples of common mid-nineteenth century to mid-twentieth-century single dwellings and vernacular farm buildings. Berger recommends 35 of the 36 newly surveyed architectural resources and 14 of the 17 previously recorded architectural resources in the surveyed area as not eligible for inclusion in the National Register. Three of the 17 previously recorded resources within the APE could not be surveyed because they were inaccessible at the time of this survey: Pine Forest (VDHR No. 088-0054), Bel-air (VDHR No. 088-0133), and 4236 Lewiston Road (VDHR No. 088-5044). One of these three, Pine Forest, was determined to be not eligible for inclusion in the National Register by the VDHR in December 1980. The other two remain unevaluated. One newly surveyed resource (VDHR No. 016-5042 / Farm, Blantons Road) is recommended as eligible for inclusion in the National Register.

Dominion agrees with and adopts the Berger recommendations described above.

If the project moves forward, Dominion will (1) avoid archaeological site 44SP0618 and coordinate with the VDHR to ensure protection of previously evaluated and newly discovered cultural resources; and (2) consult with VDHR on conducting a viewshed analysis and photo-simulations of the three architectural resources identified in the Berger architectural survey report.[1] Dominion will continue to consult with the VDHR until the Section 106 process is completed, to consult with the NRC to meet its regulatory obligations, and to address historic resources and preservation as appropriate.

[1] Dominion previously committed to implementing these types of actions in a November 4, 2008 letter from E. S. Grecheck, Dominion to K. Kilpatrick, VDHR

Please note that a copy of this letter is being distributed to the U.S. Nuclear Regulatory Commission. If you have any questions, please contact Tony Banks at 804-273-2170 or tony.banks@dom.com.

Very truly yours,

Eugene S. Grecheck

cc: USNRC w/o enclosures
Project File

Enclosures (two copies each):
1) Archaeological Survey of the Proposed North Anna-Ladysmith 500kV Transmission Line, June 2009
2) Architectural Survey of the Proposed North Anna-Ladysmith 500kV Transmission Line, June 2009

Enclosure 1
Archaeological Survey of the Proposed North Anna-Ladysmith 500kV Transmission Line, June 2009

Enclosure 2
Architectural Survey of the Proposed North Anna-Ladysmith 500kV Transmission Line, June 2009