



COMMONWEALTH of VIRGINIA

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August 11, 2010

Ms. Joyce B. Livingstone
Dominion Resource Services, Inc.
Innsbrook Technical Center
5000 Dominion Blvd.
Glen Allen, VA 23060

Re: *Viewshed Impact Analysis for VDHR #088-0133 and #016-5042*
Addendum to Architectural Survey of the Proposed North Anna – Ladysmith 500kV Transmission
Line, Louisa, Spotsylvania, and Caroline Counties, Virginia
DHR File No. 2009-0430

Dear Ms. Livingstone:

We have received the above-referenced analysis and requested archival materials prepared by The Louis Berger Group, Inc. for Dominion Resources, Inc. These studies were conducted in accordance with DHR's *Guidelines for Assessing Impacts of Proposed Electric Transmission Lines and Associated Facilities on Historic Resources in the Commonwealth of Virginia* (January 2008). We reserve the right to provide additional comment as part of consultation with any responsible Federal agency under Section 106 of the National Historic Preservation Act, if applicable.

Visual impact analyses were completed for three resources: Bel-Air (DHR ID #088-0133), House on Lewiston Road (DHR ID #088-5044), and the Farm, Blanton's Road (DHR ID #016-5042). Our comments on these analyses are presented below:

088-0133, Bel-Air

This property was previously not accessible during the Phase I Reconnaissance Survey. In our letter dated November 9, 2009, DHR requested additional consideration for the property to confirm whether or not it was still extant. The consultant gained access to the property and a reconnaissance level survey was completed. The consultant currently recommends Bel-Air, a ca. 1728 two-story frame dwelling, as *eligible* for listing in the NRHP under Criterion C, and DHR concurs with this recommendation. The report also states, and DHR concurs, that the proposed transmission line will have *no visual impact* on Bel-Air due to tree coverage and dense vegetation.

088-5044, House at 4236 Lewiston Road

This house was previously not accessible during the Phase I Reconnaissance Survey. DHR did not request additional consideration of the resource. Regardless, the consultant determined that

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this property was incorrectly mapped in DHR files and the property is actually located outside of the architectural APE. DHR concurs that no further work is needed for this property.

016-5042, Farm, Blanton's Road

This farm was previously recommended *eligible* during the Phase I Reconnaissance Survey and DHR concurred in our letter dated November 9, 2009. The proposed transmission line will be visible from the property at a great distance, as well as being partially obscured by a tree line. Based upon a review of the information provided, DHR recommends that the proposed project will have a low visual impact, as opposed to a low-to-moderate impact, on the Farm, Blanton's Road. No further mitigative measures are warranted for this resource.

In our November 9, 2009 letter, DHR requested additional consideration of Pine Forest (DHR ID #088-0054) and additional evaluation, including interior documentation, of Llangollen (DHR ID #088-0126). The *Viewshed Impact Analysis* report did not address our previous concerns with these two properties; however, we received additional information on June 29, 2010.

088-0054, Pine Forest

The consultant was denied access to the resource and a viewshed analysis was not completed. The resource was determined not eligible by DHR in 1980 and removed from the VLR in 1981. The house is extant, but in the consultant's opinion, has lost integrity due to the poor condition. As evidenced from the aerial imagery, several sections of roofing are missing, the foundation is in ruins, and the surrounding landscape has been cleared and subdivided for development. DHR assumes that based on the additional information, the consultant maintains that Pine Forest is *not eligible*. Since access was denied, and it appears the resource is in a state of ruin, DHR concurs with the consultant's recommendation. However, for future reference, any eligibility decision made by our office nearly thirty years ago must be re-evaluated today.

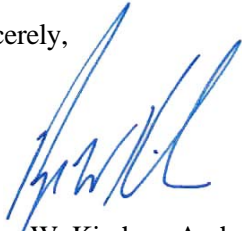
088-0126, Llangollen

The consultant revisited the property and maintains that the property does not possess sufficient architectural integrity for listing in the National Register of Historic Places. The consultant concludes that the property has been altered with replacement materials including roofing, siding, windows, and porch, and the structure also does not exhibit characteristics that would make it a representative example of an early 19th century vernacular frame dwelling. DHR does not concur with the consultant's recommendation of not eligible. In our November 9, 2009 letter, we requested intensive-level survey of Llangollen, including interior documentation; however, we received no interior photographs. The complete archival record for this property on file at our office includes one interior photograph from 1971 that reveals significant interior details. We remain intrigued by its form and construction method as an early nineteenth century vernacular frame dwelling, with possible educational themes and an association to Bel-Air (DHR ID #088-0133). Regardless of its exterior integrity, which is logical given the age of this property, we suggest that this property may have significant interior features (woodwork, structural framing, brick chimney construction, floor plan) that would compensate for exterior integrity issues. We respectfully reiterate our request for a full intensive-level survey of Llangollen.

Depending on the outcome of the evaluation of Llangollen, additional visual impacts analyses may be needed. Accordingly, we cannot concur at this time with Dominion's finding of no effect on historic resources. Furthermore, if and when access roads and staging areas are identified and if those locations require additional ground disturbance of intact soils, additional archaeological survey of those locations is

recommended. If you have any questions concerning our comments on architectural resources, please contact Andrea Kampinen at andrea.kampinen@dhr.virginia.gov; otherwise, please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,



Roger W. Kirchen, Archaeologist
Office of Review and Compliance

c: Mr. Tony Banks, Dominion Resource Services, Inc.
Mr. Eric Voigt, The Louis Berger Group, Inc.

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