



COMMONWEALTH of VIRGINIA

Department of Historic Resources

Molly Joseph Ward
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

October 12, 2016

Ms. Anna Lawston
U.S. Army Corps of Engineers
Warrenton Field Office
P.O. Box 578
Amissville, Virginia 20106

RE: *Midwood Property, Prince William County, Virginia, Cultural Resources
Investigation*
DHR File No. 2016-3825

Dear Ms. Lawston:

The Department of Historic Resources (DHR) has received for our review and comment copies of the report referenced above prepared by Thunderbird Archaeology in December 2015. Our comments are provided to the U.S. Army Corps of Engineers (Corps) as assistance in meeting its responsibilities under Section 106 of the National Historic Preservation Act. The investigations and report generally meet applicable standards and guidelines, and DHR accepts the report as a reasonable and good faith effort to identify historic properties.

The archaeological survey resulted in the identification of two historic sites (44PW1948 and 44PW1950), one prehistoric site (44PW1949), and one site with both prehistoric and historic components (44PW1951). The report recommends and DHR concurs that sites **44PW1948**, **44PW1949**, **44PW1950**, and **44PW1951** are not eligible for listing in the National Register of Historic Resources (NRHP).

With regard to architectural and landscape resources, DHR concurs with the consultant's recommendation that the early twentieth-century dwelling recorded as DHR Inventory No. **076-0498** is not eligible for listing in the NRHP. As noted in the report, the project falls within the boundaries of three Civil War battlefields: Buckland Mills (DHR Inventory No. 030-5152), Thoroughfare Gap (DHR Inventory No. 030-1016), and Manassas Station Operations (DHR Inventory No. 076-5036).

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
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Thoroughfare Gap Battlefield is listed in the NRHP; however, the NRHP limits are over two miles east of the project area and, therefore, this resource is unlikely to be affected by the undertaking. The Buckland Mills and Manassas Station Operations battlefields are both eligible for listing in the NRHP. The proposed new construction is well away from the core areas of Manassas Station Operations battlefield, and only impacts a small section of the resource utilized by the opposing armies as avenues of ingress and egress. Such routes are normally not recommended as being included within the NRHP boundary for a battlefield property (See "National Register Bulletin 40: Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields", page 13). Therefore, we do not believe that the undertaking will affect the portion of Manassas Station Operations battlefield eligible for inclusion in the NRHP.

The project's area of potential effects is located within the Core Area of the Buckland Mills battlefield, as defined by the American Battlefield Protection Program of the National Park Service. This Core Area still retains a high degree of historic integrity and contributes to the overall resource. We believe that the undertaking will result in an *adverse effect* on the Buckland Mills battlefield, and we request that an alternative location for the Midwood warehouses be considered in order to avoid negatively impacting the historic property. If an alternate location for the warehouses is not feasible, we request that the Corps and its applicant continue to consult with DHR regarding appropriate mitigation measures and the development of a Memorandum of Agreement to formalize the mitigation strategies. The Advisory Council on Historic Preservation should be informed of this adverse effect and invited to participate in consultation.

Thank you for your consideration of historic resources. We look forward to continued consultation with the Corps to successfully conclude the Section 106 process. If you have any questions concerning these comments, or if we may provide any further assistance, please do not hesitate to contact Greg LaBudde at (804) 912-3358 or gregory.labudde@dhr.virginia.gov.

Sincerely,



(for)
Roger W. Kirchen, Director
Review and Compliance Division

Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

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5357 Main Street
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