

May 29, 2012

Charlene Dwin Vaughn, Assistant Director
Federal Permitting, Licensing, and Assistance Section
Advisory Council for Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 803
Washington, DC 20004

Re: Route 1 Improvements from Telegraph Road to Mount Vernon Memorial Highway
Fort Belvoir, Fairfax County, Virginia

Dear Ms. Dwin Vaughn:

I am writing on behalf of Save Woodlawn Stables, a Consulting Party in the ongoing Route 1 Improvements project at Fort Belvoir. We have been involved as a Consulting Party for only a few weeks, but are deeply concerned that the public process has not been following proper Section 106 procedures, and has not been coordinated adequately between the Federal agencies, with the affected properties, or with the larger community. On June 9, 2011, the Advisory Council for Historic Preservation (ACHP) sent a letter to Mr. Jack VanDop of the FHWA referencing this project, and declining to offer comment. Your office did state, however, that “if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.” Please accept this letter as our formal request that the ACHP reconsider its earlier decision and reengage with the process.

We believe that Criteria 1-3 of Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of the ACHP regulations, “Protection of Historic Properties” (36 CFR Part 800), apply to this undertaking in the following manner:

(1) Has substantial impacts on important historic properties.

- The FHWA preferred option for a “Southern Bypass” will result in the removal of the Otis Tufton Mason House (029-5181-0006), noted as a contributing resource to the larger National Register District, and to the locally designated Fairfax County Woodlawn Historic District. The plans for deconstructing and moving the house are only vaguely described and planned for at best in the current draft Programmatic Agreement.
- The impacts of the proposed “Southern Bypass” on the larger National Register District and the Woodlawn National Historic Landmark are not well documented or understood. The limited visual impact studies that have been conducted indicate that the proposed Bypass may be visible from, and have a greater impact on multiple contributing properties, including the:
 - Woodlawn Plantation NHL (029-0056);
 - Sharpe Stables Complex (029-5181) (including the Dairy, Corncrib, Stable and individually -eligible Bank Barn (029-5181-0005));

- Grand View (029-0062);
- Woodlawn Quaker Meetinghouse(029-0172) and cemetery (44FX1211);
- Woodlawn Baptist Church and cemetery (44FX1212);
- George Washington’s Distillery and Grist Mill site 249 (029-0330); and
- Pope-Leighey House 250 (029-0058).
- Several Consulting Parties have commented repeatedly at recent meetings about the need for further documentation of the overall historic landscape of the NHL and the NR-eligible district and the relationship of all the contributing properties to those districts. There is real concern among the stakeholders that the proposed “Southern Bypass” will have a permanent and detrimental effect on the entire National Register-eligible district and on the NHL. Requests for further study and information from FHWA relating to the historical landscape, and studies on the relationship of the contributing resources to the landscape, have been rebuffed.
- Archaeological work at the site has been ongoing, but the information has not been systematically updated, nor will it be updated prior to the execution of the Programmatic Agreement. While selected excavations have been carried out, the larger archaeological survey of the property, finished in 1999, but not accepted by the SHPO, will not be completed until after the PA is finalized. Multiple requests from the Consulting Parties to complete this important work and have it available for review prior to the selection of a preferred option have also been rebuffed.

(2) Presents important questions of policy or interpretation.

- There are still unresolved issues of compliance with 36 CFR 800.4 (Identification and evaluation of properties in accordance with the criteria of the National Register of Historic Places) and 36 CFR 800.5 (Assessment of effect on National Register listed and eligible historic properties). This lack of adequate documentation and assessment makes it difficult to judge the appropriateness or adequacy of the Draft Programmatic Agreement’s stipulations. Appropriate mitigation of the adverse effects to historic properties cannot be determined without additional information, which again, has not been provided by FHWA despite repeated requests from some Consulting Parties.

(3) Has the potential for presenting procedural problems.

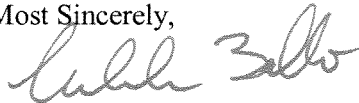
- The scope of the project has been altered substantially since the last public meeting in October 2011. This has occurred without the benefit of adequate public notice and outreach to the affected Consulting Parties. The 2005 BRAC EIS and subsequent documents all evaluated the impacts of a widening-in-place option that would add two lanes to Route 1 with a center reservation for a future mass transit option, sidewalks, and a 10’ bike path. The last public meeting on this matter on October 19, 2011, showed the widening-in-place option. However, at the next Consulting Parties meeting on November 3, 2011, suddenly a new “Southern Bypass” option was presented. It must be understood that this option was neither solicited nor generated by a prior meeting of the Consulting Parties, nor has it been presented yet in public. The “Southern Bypass” option would result in the construction of a 6-lane elevated roadway, approximately 30 feet high, possibly with sound barriers, and a 6% grade. When FHWA began scoping this option with consultants in November 2011, Scanlin Farms, Inc., the long-term leaseholder of the stables for over 30 years, was not made aware of these drastic changes to the plans, nor were they ever contacted by FHWA or invited to

be part of the Consulting Parties process. The Woodlawn Stables were identified early in the public comment period as a valued local resource to be protected. We question how this “Southern Bypass” option can be presented as the preferred option at the final public comment meeting June 5th without adequate review and input by the Consulting Parties, affected property owners, and the overall community.

- The FHWA has not provided a timeline of how this project review will be synchronized with the larger NEPA and Section 4F studies. Such a timeline is commonplace in large-scale, Federal projects. Yet when Consulting Parties have requested this information, FHWA responded that it would not be provided for review. It remains unclear at this late stage of the project how NEPA and the relevant authorities are being coordinated.
- The FHWA has concluded that the “Southern Bypass” option is the preferred option without studying the other potential alternatives for this roadway. Impacts associated with a widening-in-place proposal, or at the very least a limited impacts option, have not been adequately documented or have been discarded early in the study process. This was not done in reaction to Consulting Party comments or objections from the SHPO. It remains unclear why other options were not considered and what impacts they may have on the NHL and NR-eligible district. Other alternatives may have less of an adverse impact on the study area, but the necessary information is not available to make this important determination.

We strongly urge that the ACHP reengage in this process as soon as possible as an active participant. We are confident that through continued dialogue with all the affected parties involved, a more reasonable outcome can be achieved that ultimately will have a lesser impact on these valuable historic resources and community assets at stake. If there are any questions concerning our comments, please feel free to contact me directly at rmballo@yahoo.com or 703-228-3812.

Most Sincerely,



Rebecca Ballo
Save Woodlawn Stables

cc. Congressman James Moran
Congressman Gerry Connolly
State Senator Toddy Puller
State Senator Adam Ebbin
Delegate David Albo
Delegate Scott Surovell
Delegate Mark Sickles
Mount Vernon District Supervisor Gerry Hyland
Jack VanDop, FHWA
Marc Holma, DHR