



## PIEDMONT ENVIRONMENTAL COUNCIL

*Safeguarding the landscape, communities and heritage of Virginia's Piedmont by involving citizens in  
Related public policy and land conservation*

Raymond Ezell, RPA

Virginia Department of Transportation

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Re: John G. Lewis Bridge, Featherbed Ln Bridge over Catoctin Creek, DHR file 2014-0426

Dear Mr. Ezell:

On behalf of The Piedmont Environmental Council (PEC), I am providing the following comments as a part of the 106 consultation process for the John G. Lewis Bridge in Loudoun County. PEC was formed in 1972 for the purpose of preserving and protecting the natural resources, rural economy, history, and beauty of the Virginia Piedmont. We have played an active and integral role in preserving the Commonwealth's historic resources and landscape in our 9-county region for over 40 years.

PEC's primary goal in this process is to reach a determination on the potential for restoration of the bridge and evaluate the various options designed to retain the structure's listing on the National Register of Historic Places (NRHP). We appreciate VDOT's efforts to provide options to address the current condition of the John G Lewis Bridge. However, we believe there has been a rush to reach consensus on a solution and that the agency has failed to provide adequate information to make an informed decision. VDOT has provided little evidence and shown no external peer review as to how they reached the determination that rehabilitation for the continued use as a vehicular bridge, which would assuredly retain the listing of the resource on the NRHP, is no longer possible.

In the agency's haste to progress the project, several steps in the procedure appear to have been

overlooked or postponed. This has actually caused delay as these steps may have provided information that would assist the community in reaching a conclusion on the options - those presented and those yet to be fully evaluated. Also of concern, none of the options provided by the agency include restoration and

rehabilitation for vehicular traffic. The one option that retains the bridge without any major changes, eliminates its historic use as a vehicular bridge and ultimately changes the character of the area to the point where the listing may be threatened. While challenges have been identified, including the possibility for damage resulting from the metalizing treatment instituted in 2003, the agency has been unable to prove existing issues were the result of metalizing or if any of the cracks would prevent the repair and continued use of the bridge. VDOT has not even been able to tell us the material used in the bridge (iron or steel) construction, which would also give some insight on the potential for rehabilitation and restoration.

It has been a point of frustration that the agency has failed to involve the VA Department of Historic Resources (VDHR) nor provide information on what effect the options presented would have on the status of the resource as it pertains to the listing on the National Register of Historic Places. As this is a 106 proceeding, we would have thought we would have received some input from the SHPO and VDHR by this point. It was only by contacting VDHR that we were made aware that VDOT had not involved the SHPO in any meaningful way thus far. We were please to see the correspondence from VDHR expressing their desire to be a part of the conversation.

36 CFR 800 provides that the SHPO will cooperate “...to ensure that historic properties are taking into consideration at all levels of planning and development.” Consultation shall be initiated in a manner appropriate “...to the nature of the undertaking and its effects on historic properties.” Given the solution employed may affect the listing on the Register, we thought the SHPO should have already been engaged by this point. The code states: “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 National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.” Given that all options presented by the agency at this time would likely constitute an adverse effect, we eagerly await the invitation of the SHPO and VDHR to review all pertinent documents related to the project and their participation at any future meeting of the consulting parties.

We appreciate this opportunity to provide comments on this project and look forward to continued

discussion as it pertains to the section 106 proceeding.

Sincerely,

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