



Cloverdale Branch - AB 290 (Sub-No. 351X)
RWimbish
to:
Joshua.Wayland
01/16/2014 05:06 PM
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From: RWimbish@bakerandmiller.com

To: Joshua.Wayland@stb.dot.gov

1 Attachment



Roanoke Cement Quarry Expansion_DOE (DHR File 2011-3603).pdf

Per our discussion

As you will see, there is discussion of the former N&W rail line in the attached DHR letter. It appears that the letter mistakenly assumes that the affected rail line is part of the former AM&O, which is not the case, as is detailed in the Historic Report that we have submitted as part of NSR's abandonment filing. This is, instead, a much more recently-constructed branch line built in the 1950s. But, in any event, it seems to me that the letter reflects that DHR has ALREADY taken the subject railroad r-o-w into account.

And this is why it seems to me that what DHR is asking now of Norfolk Southern is redundant of prior site evaluation work and unnecessary.

- Rob

Robert A. ("Rob") Wimbish
Attorney at Law

Baker & Miller PLLC
Suite 300
2401 Pennsylvania Ave., NW
Washington, D.C. 20037
202.663.7824 (direct) / 202.663.7849 (fax)

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COMMONWEALTH of VIRGINIA

Department of Historic Resources

Douglas W. Domenech
Secretary of Natural Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Kathleen S. Kilpatrick
Director

Tel: (804) 367-2323
Fax: (804) 367-2391
TDD: (804) 367-2386
www.dhr.virginia.gov

August 6, 2012

Jeanne Richardson
U.S. Army Corps of Engineers, Norfolk District
West Central Field Office
P.O. Box 3160
Lynchburg, VA 24503-0160

RE: *Phase I Cultural Resources Survey of the Roanoke Cement Quarry Expansion and Stream Compensation Sites, Botetourt County, Virginia* (Corps Project No. NAO-2011-0118; DHR File No. 2011-3603)

Dear Ms. Richardson:

We have received for review the report referenced above prepared by Circa~Cultural Resource Management, LLC (Circa~) on behalf of the Roanoke Cement Company, LLC. Our comments are provided as assistance to the United States Army Corps of Engineers, Norfolk District in meeting its responsibilities under Section 106 of the National Historic Preservation Act. We are pleased to inform you that the survey and report meet the *Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* (48 FR 44716-42) and DHR's *Survey Guidelines* (rev. 2011).

The cultural resources investigations revisited one previously identified archaeological site, identified five new archaeological sites, two isolated finds, and three architectural resources. Isolated finds are, by definition, not eligible for listing in the National Register of Historic Places (NRHP) and no further investigations on these resources are warranted. With respect to the archaeological sites, Circa~ stated that each of the six recorded archaeological resources exhibited diminished research potential due to low artifact density, compromised stratigraphic deposits, and lack of intact subsurface cultural features. DHR concurs that each of these archaeological resources, summarized in the following table, are not eligible for the NRHP.

Site Number	Type	Association	NRHP Eligibility
44BO0197	Lithic Scatter	Prehistoric/Unknown	Not Eligible
44BO0603	Domestic	20 th Century	Not Eligible
44BO0604	Domestic	20 th Century	Not Eligible
44BO0605	Lithic Scatter	Prehistoric/Unknown	Not Eligible
44BO0606	Lithic Scatter	Prehistoric/Unknown	Not Eligible
44BO0607	Lithic Scatter	Middle Archaic	Not Eligible

With respect to the architectural resources, DHR concurs with the consultant's recommendation that the **Abandoned 20th Century Farmstead (DHR ID# 011-5479)** and **Collapsed Barn (DHR ID# 011-5480)** are not eligible for the NRHP.

Administrative Services
10 Courthouse Ave.
Petersburg, VA 23803
Tel: (804) 862-6416
Fax: (804) 862-6196

Capital Region Office
2801 Kensington Office
Richmond, VA 23221
Tel: (804) 367-2323
Fax: (804) 367-2391

Tidewater Region Office
14415 Old Courthouse Way
2nd Floor
Newport News, VA 23608
Tel: (757) 886-2807
Fax: (757) 886-2808

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

Northern Region Office
5357 Main Street
P.O. Box 519
Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

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With respect to the Norfolk and Western Railroad (DHR ID# 011-5481), taken as a whole, the railroad corridor may be eligible for the NRHP due to its association with the ca. 1870s Atlantic, Mississippi & Ohio Railroad and William Mahone. In order to determine if the railroad as whole is eligible, a more comprehensive evaluation of the rail corridor is necessary. However, due to the nature of the proposed undertaking, even if this resource is determined eligible for the NRHP, it would not be adversely affected. Therefore, in an effort to move the Section 106 consultation process along, DHR recommends treating the **Norfolk and Western Railway (DHR ID# 011-5481)** as potentially eligible, but the effect on this resource would not be adverse.

Thank you for giving us the opportunity to comment on this project. If you have any questions concerning our comments, or if we may provide any further assistance, please do not hesitate to contact me at (804) 482-6452; brad.mcdonald@dhr.virginia.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad', with a stylized flourish at the end.

Brad McDonald, Archaeologist
Office of Review and Compliance

c. Curtis Hickman, Kerr Environmental Services Corp.
Carol Tyrer, Circa~