Ms. Julie V. Langan, Director ATTN: Ms. Sherry Teal Virginia Department of Historic Resources 2801 Kensington Ave. Richmond, VA 23221

Re: VDOT Project: I-66 EB & WB Bridge Replacement over Broad Run

VDOT Project Number: 0066-030-543

VDHR File No: 2023-0072

Dear Ms. Langan:

I write to you on behalf of Turn the Mill Around Campaign, a 501(c)(3) non-profit dedicated to the stabilization, preservation, and interpretation of the Chapman-Beverley Mill. The Mill is a striking landmark of Virginia's Broad Run region and the Commonwealth's storied agricultural history. Initially constructed in 1742, the Mill has survived war, arson, and aggressive suburban expansion, eventually earning its place on both the National Register of Historic Places and the Virginia Landmarks Register.

VDOT and the Turn the Mill Around Campaign have made exceptional efforts to preserve the Mill and its surrounding historic site, ensuring accessibility for a new generation of Thoroughfare Gap travelers. VDOT's contributions include modifications to the initial Broad Run bridge design to prevent the Mill's demolition, as well as two subsequent TEA-21 grants that supported stabilization and public access projects.

After reviewing VDOT's letter dated January 21, 2025, we at the Campaign are concerned that these efforts—and the Mill itself—are at risk due to the current scope of Project 0066-030-543. Our concerns are as follows:

First, VDOT has increased the scope of this project from a superstructure replacement to a full bridge replacement. We question whether the required preliminary studies, on which VDOT's proposal relies, remain applicable to the increased scope of its project.

Second, the proposed bridge design includes thirty-foot-wide shoulders adjacent to both travel lanes—significantly larger than their existing footprint. This contradicts VDOT's claim that 'the project does not... increase the interstate capacity of I-66 in this area, nor the bridge itself.' Such excessively wide shoulders represent an unnecessary use of federal highway funds entrusted to VDOT. Reducing their width would mitigate the project's adverse impact on the Mill and its historic site. Furthermore, we question whether VDOT will adhere to Section 106 of the National Historic Preservation Act and allow for public consultation when it inevitably alters the bridge's traffic markings to accommodate additional lanes made possible by these oversized shoulders.

Finally, we take exception to VDOT's application of the criteria for adverse effects on historic properties. Specifically, we challenge VDOT's claim that expanding the Broad Run bridge by fifteen feet towards the Mill and Broad Run Post Office 'will not appreciably alter any character-defining elements of these historic properties nor any aspects of historic setting or feeling.' The initial construction of I-66 in the 1970s demonstrably diminished the Mill site's historic setting. VDOT's proposed expansion would worsen these impacts by bringing traffic even closer, increasing noise and vibration that would disrupt both the site's historic character and the Mill's structural stability. Importantly, the encroachment would reduce the terminal cul-de-sac in front of the Broad Run Post Office, impeding emergency vehicle access and making it more difficult for individuals with disabilities to reach the Mill from distant accessible parking spaces. One need only visit the Mill to immediately observe how the historic setting and feeling would be further compromised by situating the I-66 bridge fifteen feet closer to the Mill and Broad Run Post Office structures.

We have previously proposed considerations that would mitigate the serious impact of this project on the Chapman-Beverley Mill's stability and historic value. We at Turn the Mill Around Campaign formally request that you and your department support our proposal so that VDOT might seriously consider incorporating our considerations into its project design.

These considerations are as follows:

• Limit new construction to the bridge's existing footprint by reducing the width of the 30' shoulders to accommodate its existing footprint. Alternatively, direct any expansion toward the South side (EB portion) of the existing bridge.

- Reduce temporary disturbance from bridge demolition and construction to the
 existing right-of-way, specifically to areas south of the Mill Store (VDHR ID 076-199)
 that were previously disturbed by past bridge work within the APE. VDOT's
 statements suggest this concern has been acknowledged, and we hope it will not
 reappear in future design iterations.
- Prohibit the use of dynamite, ANFO blasting, and high impact rock hammering during construction. The vibrations generated by such activity would adversely impact the stability of Chapman-Beverley Mill's stacked stone structure (VDHR ID 076-0002).
- Restore the existing condition of any area on the North side of the project that is temporarily disturbed by the project construction, including repaving of the historic site's access road where damaged or removed.
- Construct a new safety wall using the same low profile timber guardrail design of the existing bridge, without the use of any faux stone facades.

We feel these considerations will mitigate the negative impacts this project will have on the Mill and its surrounding site. In the 1970s, during the initial design and construction of I-66, concerned citizens were able to dissuade VDOT from demolishing the Mill in order to efficiently route the interstate through the narrow Thoroughfare Gap. We seek your aid in preventing such historic efforts to be whittled away by the excessive scope of Project 0066-030-543. Together, we must act now to protect what remains of the rich history and character of Thoroughfare Gap, the cultural passageway through the Bull Run Mountains.

Regards,

Earl H. Douple, Jr., President Turn The Mill Around Campaign

CC:

The Honorable Tim Kaine, United States Senate

The Honorable Mark R. Warner, United States Senate

The Honorable Suhas Subramanyam, United States House of Representatives

The Honorable Danica A. Roem, Virginia State Senate

The Honorable Bryce E. Reeves, Virginia State Senate

The Honorable Russet Perry, Virginia State Senate

The Honorable Michael J. Webert, Virginia House of Delegates

The Honorable Geary M. Higgins, Virginia House of Delegates

The Honorable Josh Thomas, Virginia House of Delegates

The Honorable Robert B. Weir, Prince William County Board of Supervisors

The Honorable Edwin W. "Ike" Broaddus, Fauquier County Board of Supervisors

Justin Patton, Prince William County Historical Commission

Wendy Wheatcraft, Fauquier County Community Development