



November 18, 2016

**Subject: Statement of Effects  
Milestone Communications  
11100 Gordon Road, Fredericksburg, Spotsylvania County, Virginia  
DVP Chancellorsville Substation  
Latitude / Longitude: 38° 15' 41.1" N / 77° 35' 20.2" W  
AARCHER Project Number – 090026.09.0026**

Aarcher, Inc has prepared this statement of effects for proposed construction of the DVP Chancellorsville Substation telecommunications site. Milestone Communications proposes the construction of a 2,625 square feet telecommunications facility near 11100 Gordon Road in Fredericksburg, Virginia. The overall tower height will be 156-feet. Because telecommunications facilities are Federal Communication Commission (FCC)-licensed entities, the construction of the facility constitutes an undertaking and its potential impact on historic properties must be considered in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 (as amended). The proposed upgrade will involve subsurface ground disturbance and a separate analysis of those effects was conducted.

#### Area of Potential Effects for Direct Effects

The Area of Potential Effects (APE) for direct effects consists of the area directly impacted by the installation of the telecommunications facility. The APE for direct effects is confined to the area of ground disturbance (the area leased by the tower builder, including access easements) with respect to the potential impact to archeological resources, and to the subject property with respect to above-ground resources.

Direct effects include the physical alteration of the design, materials, workmanship, and association of a historic property by construction or demolition related to the undertaking as well as the alteration of the character of the property (feeling, setting, or association) by the introduction of intrusive visual elements that diminish those qualities that convey the significance of the property.

#### Area of Potential Effects for Indirect/Visual Effects

Effects were evaluated only on those properties that area considered *historic* under the terms established by the National Programmatic Agreement (NPA), which was established to streamline the review process for telecommunications projects. The NPA defines historic properties as:

- Properties listed in the NRHP;
- Properties formally determined eligible for listing by the Keeper of the National Register;
- Properties that the SHPO certifies are in the process of being nominated to the NRHP;
- Properties previously determined eligible for listing as part of a consensus determination of eligibility between the SHPO and the Federal Agency;
- Properties that the SHPO has previously evaluated and determined to be eligible for the NRHP.

A recommendation of *no effect* is applied to resources where the undertaking would not be visible from the identified property. A *no effect* finding is given when the identified property is not considered historic under the terms of the NPA. The *no effect* determination is also applied to properties that have been significantly altered or have deteriorated to such a degree that they no longer retain integrity of design or materials; thereby making the property ineligible for listing in the NRHP regardless of visual factors.

Given that the height of the tower (156 feet) a Visual APE of 0.5 miles was used to evaluate resources for this undertaking.

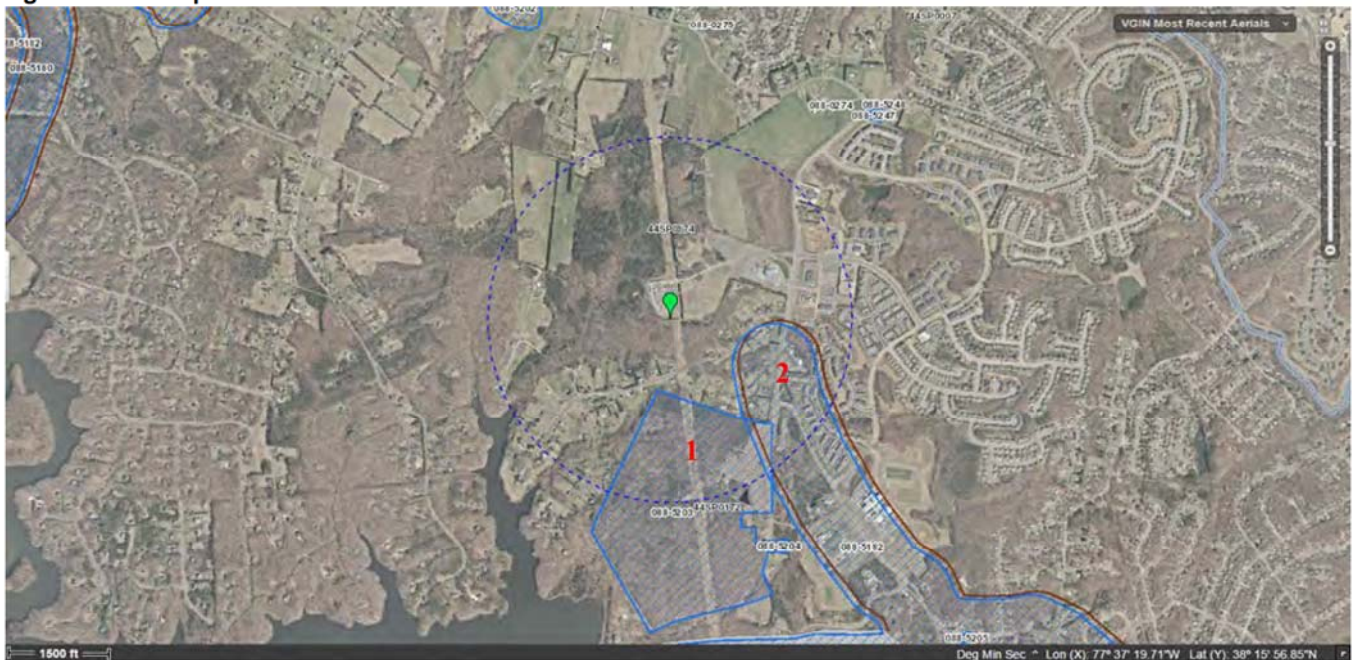


### Identification of Historic Properties

11100 Gordon Road (DVP Chancellor Substation) is a fenced compound which houses an electrical substation and from aerial photographs appears to have been constructed between 1994 and 2000. The project area will be on a berm south of the fenced compound of the substation.

Research of the Virginia Department of Historic Resources (DHR) revealed two DHR-listed resources (Table 1) within 0.5 miles of the project area. This includes the Earl Weimer Farm which has not been evaluated to determine its National Register eligibility and the National Register eligible Spotsylvania Court House Battlefield. For the purposes of this evaluation, only the Spotsylvania Court House Battlefield will be evaluated to determine the potential visual impact of this undertaking.

**Figure 1: APE Map**



**Table 1: Virginia DHR resources within 0.5 miles of the project area.**

Number	Name	Address	DHR ID	NR	NHL
1	Earl Weimer Farm	10826 Gordon Road (Rt 627)	088-5203	Not Evaluated	No
2	Spotsylvania Court House Battlefield	n.a.	088-5182	Potentially Eligible (2007)	No

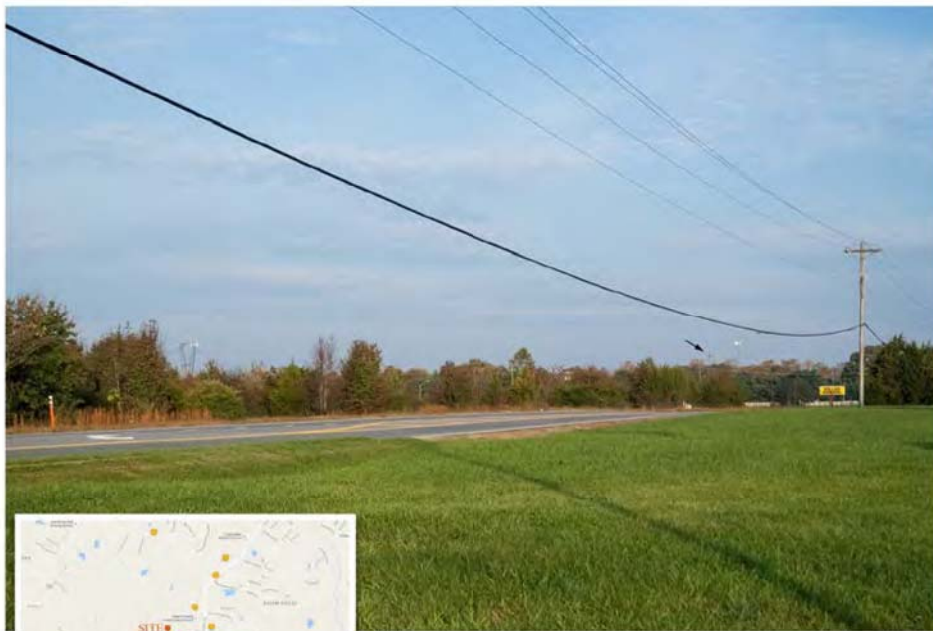
Photo-simulations are provided to visualize the indirect effects of the proposed undertaking. These photo-simulations show that the proposed tower will be visible from portions of the Spotsylvania Court House Battlefield within the 0.5 mile visual APE.



Figure 2: Photo-simulations from Historic Resources toward the proposed project area.



DVP CHANCELLOR  
PROPOSED MONOPOLE



DVP CHANCELLOR  
PROPOSED MONOPOLE



Effects on Identified Historic Properties

The APE for Direct Effects consists of the project area within the Subject Property (11100 Gordon Road). The compound on the Subject Property, DVP Chancellor Substation, was constructed during the 1990s. The subject property is not considered a historic place for the purpose of this review. The project area consists of an undeveloped portion along the edge of the Subject Property. An archaeological evaluation was conducted to determine the possible impact that the project would have to potential subsurface resources because the project will include ground disturbance. That investigation identified no historic resource. The project will involve the construction of a 156-foot monopole tower within a 2,625 square feet telecommunications facility. Since there are no historic properties with regards to the APE for Direct Effects there will be **No Effect**.

There is one resource that is considered historic under the terms of the NPA within the 0.5 miles APE for Visual Effects, Spotsylvania Court House Battlefield. The battlefield represents a landscape that was the scene of a major battle during the US Civil War from May 8-21, 1864. A northern branch of this battlefield lies within 0.5 miles of the proposed project area. This portion is outside of the core of the battlefield and is currently an area of mixed development with agricultural, commercial, and residential enclaves. While the project area is visible from this historic resource, the viewshed currently contains utility poles and towers. The additional tower will not add an adverse cumulative effect to this viewshed. With regards to the APE for Visual Effects there will be **No Adverse Effect**.

Prepared by:  
Aarcher, Inc

A handwritten signature in black ink, appearing to read 'Bill Auchter', is positioned below the text 'Aarcher, Inc'.

Bill Auchter  
Archaeologist/Historian