

**ARCHAEOLOGICAL SURVEY
PROPOSED SPOTSYLVANIA SOLAR ENERGY CENTER
SPOTSYLVANIA COUNTY, VIRGINIA**

VDHR File# 2017-4023

**PREPARED FOR:
SPOWER DEVELOPMENT COMPANY, LLC
2180 SOUTH 1300 EAST SUITE 600
SALT LAKE CITY, UTAH 84106
(562) 348-1118**

**PREPARED BY:
Commonwealth Heritage Group, Inc.
P.O. BOX 1198
201 WEST WILSON STREET
TARBORO, NORTH CAROLINA 27886**

**Amy Krull, M.A.
Joseph Stair, M.A.
Amanda K. Stamper, M.A.
D. Allen Poyner
and
Susan E. Bamann, Ph.D., RPA
*Principal Investigator***

NCR-0766

APRIL 2018

ABSTRACT

Commonwealth Heritage Group, Inc. (Commonwealth), completed an archaeological survey for the proposed Spotsylvania Solar Energy Center in Spotsylvania County, Virginia. The survey was conducted for sPower Development Company, LLC (sPower), pursuant to an application to the Virginia State Corporation Commission (SCC). The work was conducted in a manner consistent with the requirements of the Code of Virginia, Section 10.1-1197.6 B7 and Administrative Code 9VAC15-60-40, Part B, Analyses of Historic Resources, as well as Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the Advisory Council on Historic Preservation's regulations for compliance with Section 106, codified as 36 CFR Part 800. Therefore, the survey work was conducted according to the Secretary of the Interior's *Standards and Guidelines for Historic Preservation Projects* (Federal Register, Vol. 48, No. 190, September 1983, P. 44716-44742, et seq.) as well as the Virginia Department of Historic Resources' (VDHR) 2017 *Guidelines for Conducting Historic Resources Survey in Virginia* and would meet necessary standards for review under Section 106 of the National Historic Preservation Act if the project were to become an undertaking. An architectural survey for the project was also conducted and is reported separately (Traum et al. 2018). The cultural resources survey plan for the project was reviewed and approved in consultation with VDHR.

The purpose of the survey was to determine if archaeological sites that are listed on, eligible for, or potentially eligible for the Virginia Landmarks Register or National Register of Historic Places (VLR/NRHP) are located within the project's Area of Potential Effects (APE) for direct effects on archaeological resources. The study area for the project involves 6,350 acres. The project area defining the archaeological APE is a smaller area and is based on mapping of discontinuous buildable areas supplied by sPower on August 24, 2017. The buildable areas total approximately 3,513.72 acres and represent the footprint of potential ground disturbing activities. The project is located in rural Spotsylvania County approximately 15 mi southwest of the City Fredericksburg and just east of the communities of Paytes and Mine Run. The project area itself is undeveloped and is mostly used for timber operations and hunting.

Prior to and after conducting archaeological fieldwork, background research was conducted using information from the VDHR in Richmond, the Spotsylvania County Museum in Spotsylvania Courthouse, the Albert and Shirley Small Special Collections Library of the University of Virginia in Charlottesville, the library of Commonwealth in Tarboro including extensive sources from previous work in Spotsylvania County, and online sources including historic map collections and agency databases. The archaeological was conducted between October 9, 2017 and January 19, 2018. The project area/APE for archaeology was given full consideration through visual reconnaissance (on regular transects at approximately 50-ft intervals) and through intensive survey of 1) areas defined as having a high probability for potentially intact sites, 2) a sample of low probability areas, and 3) judgmentally selected areas. To address archaeological potential within the portion of the Spotsylvania Court House Battlefield in the project area (VDHR# 088-5182), Commonwealth consulted with Eric Mink, National Park Service Cultural Resources Manager for the Fredericksburg and Spotsylvania National Military Park. Per recommendations from Mr. Mink (Eric Mink, personal communication 2017), additional survey methods such as metal detecting were not used in the battlefield area due to the lack of potential for camp, activity, or skirmish sites related to this

route of overnight troop movement to reach Spotsylvania Court House. However, the area of the battlefield overlapping with the project was thoroughly investigated through visual reconnaissance and fully covered with shovel testing at 50-ft intervals despite extensive evidence for soils erosion and low archaeological potential.

The project area is comprised of a dissected upland containing ridge tops and gentle side slopes. Within this setting, two landscape conditions dominate—recent clear cutting and pine cultivation. Variations of these two conditions include previously clear cut areas containing young secondary growth and wooded areas of taller planted pines with mixed deciduous growth. The only exceptions are several pastures/hay fields and other more natural wooded areas of limited size. The logged areas and planted pine tracts are separated by logging roads and utility corridors. Planted pines, oriented in dense rows, are accessible via these logging roads and several narrow logging trails. Several sites and artifact locations based on artifacts recovered from the surface were encountered near these logging access routes since surface visibility is increased along the margins of these roads and trails. The effects of successive pine cultivation and logging is apparent in the soil profiles found throughout the project area, which reveal extensive erosion and deflation.

There is one previously recorded but unevaluated archaeological site (44SP0104) within the boundaries of the current project area. This site is a gold mine or prospect listed as the Randolph Prospect based on previous research. Fifty-seven additional archaeological resources meeting the definition of a site were recorded as a result of the survey (44SP0709 through 44SP0765). These sites include 38 Native American sites, 9 historic sites (3 of which include a Native American artifact location), and 10 other sites related or potentially related to gold prospecting or mining. In addition to the sites, 98 locations defined by instances of less than three artifacts were recorded (referred to here as artifact locations). In general, most Native American sites within the project area were found to have low-density deposits, and most are unattributed. The Native American artifacts recovered are lithic materials. Thirty-three diagnostic points (less than two percent of the total lithic assemblage) were recovered based on the sites and artifact locations, with the types reflecting Early Archaic through Late Woodland period activity in the project area. Historic sites in the project area include nineteenth- and/or twentieth-century domestic components that have low-density artifact deposits or have been disturbed through occupation into the twentieth-century and/or logging-related activities. In addition to the previously recorded site 44SP0104, a number of sites documented during the survey are classified as nineteenth- and/or twentieth-century gold prospects or mines. Although we have records that indicate broadly when prospects and mines in the area were being explored and/or worked, the sites documented in the project area did not yield material cultural or evidence for features that would suggest a period of use or potential for significant information on the gold mining context in the project vicinity. None of the previously or newly recorded sites or artifact locations documented as part of the current survey appear eligible for the VLR/NRHP.

**CULTURAL RESOURCES SURVEY ADDENDUM
PROPOSED SPOTSYLVANIA SOLAR ENERGY CENTER
SPOTSYLVANIA COUNTY, VIRGINIA**

VDHR File# 2017-4023

**PREPARED FOR:
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2180 SOUTH 1300 EAST SUITE 600
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D. Allen Poyner
and
Susan E. Bamann, Ph.D., RPA
*Principal Investigator***

NCR-0776

JULY 2018

ABSTRACT

In April and May of 2018, Commonwealth Heritage Group, Inc. (Commonwealth) completed a cultural resource survey addendum for the proposed Spotsylvania Solar Energy Center in Spotsylvania County, Virginia. The addendum survey was conducted for sPower Development Company, LLC (sPower), pursuant to an application to the Virginia State Corporation Commission (SCC). The work was conducted for additions to the project's proposed buildable areas. The current report is an addendum to Krull et al. (2018) and Traum et al. (2018). All work was completed in a manner consistent with the requirements of the Code of Virginia, Section 10.1-1197.6 B7 and Administrative Code 9VAC15-60-40, Part B, Analyses of Historic Resources, as well as Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the Advisory Council on Historic Preservation's regulations for compliance with Section 106, codified as 36 CFR Part 800. Therefore, the survey work was conducted according to the Secretary of the Interior's *Standards and Guidelines for Historic Preservation Projects* (Federal Register, Vol. 48, No. 190, September 1983, P. 44716-44742, et seq.) as well as the Virginia Department of Historic Resources' (VDHR) 2017 *Guidelines for Conducting Historic Resources Survey in Virginia* and would meet necessary standards for review under Section 106 of the National Historic Preservation Act if the project were to become an undertaking. The specific approaches to survey conducted for this addendum are based on a cultural resource survey plan approved in consultation with VDHR in 2017 (see Krull et al. 2018 and Traum et al. 2018).

The purpose of the survey was to determine if cultural resources that are listed on, eligible for, or potentially eligible for the Virginia Landmarks Register or National Register of Historic Places (VLR/NRHP) are located within the project's Area of Potential Effects (APE). The study area for the project involves approximately 6,350 acres. Within this study area, approximately 3,413.72 acres were previously surveyed for archaeological resources (Krull et al. 2018) and considered with respect to potential effects to above-ground architectural resources (Traum et al. 2018). The current additions to the proposed solar energy center consist of numerous areas where the previously surveyed buildable areas are being extended. These extensions of the buildable areas or new survey areas are derived from mapping supplied by sPower on March 22, 2018, and April 10, 2018, and total approximately 1,111.25 acres. For direct effects to cultural resources, the current project area is the APE. For indirect effects to above-ground buildings, structures, districts, landscapes, and/or objects, the half-mile vicinity of the project was taken into consideration per consultation with VDHR, but the APE for architectural resources was ultimately defined as including those resources 50 years of age or older with potential visual impacts based on the development within the project area/buildable areas. Justification for this approach incorporates information presented in Traum et al. (2018).

The project area was given full consideration during the archaeological survey, and detailed mapping is provided to show the survey strategies that were employed in high and low probability areas and in areas with heavy disturbance due to recent logging activity. Several archaeological resource types were documented during the current survey including a multicomponent Native American/historic site, Native American lithic sites, historic gold prospects or mines (likely dating to late nineteenth and early twentieth century), and historic structure ruins (nineteenth and twentieth century). In total, 20 resources were documented, two of which were previously recorded (44SP0176 and 44SP0177), and 18 of which are newly

recorded (44SP0769 through 44SP0780). None of the archaeological resources are recommended as eligible for the VLR/NRHP.

A half-mile buffer around the project area was considered with respect to architectural resources, but overlay of the current half-mile vicinity with the area previously addressed for the Spotsylvania project (Traum et al. 2018) indicated that there are no changes to the indirect APE and that no additional structures with a potential view of the project required recordation. The current addendum project area itself, however, intersects three resources recorded under architectural resources, all of which are previously recorded. Two of these were previously addressed and evaluated in Traum et al. (2018). The two include a portion the Spotsylvania Court House Battlefield (VDHR# 088-5182) and part of the Fredericksburg and Gordonsville Railroad (VDHR# 088-5364). Commonwealth recommends no changes to the previous recommendations for these resources. The portion of the Spotsylvania Court House Battlefield in the current project area has been previously recommended as not contributing to any VLR/NRHP eligibility that may be determined for the overall battlefield. The Fredericksburg and Gordonsville Railroad section in the project area has been recommended as contributing to VLR/NRHP eligibility previously established for this resource based on other sections. Effects, however, will be minimal given plans for buffers and design plans for a temporary access road that minimize any impact to the existing railroad grade. The Wilderness Battlefield (VDHR # 088-5183) is the third and last previously recorded resource intersected by the project area. The portion of the battlefield within the current project area and within a half-mile buffer around the project area is a narrow corridor along Orange Plank Road that represents an avenue of approach and withdrawal. The footprint of the project within the battlefield includes a 250-ft-wide corridor extending from the main project area to the south up to Orange Plank Road. This overlap between the corridor and the battlefield involves a disturbed utility corridor with transmission line towers and a disturbed logging staging area. Therefore, the battlefield area in the current project area is recommended as not contributing to any eligibility for the overall battlefield.

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Architectural Historian
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and
Joseph Stair, M.A.**

NCR-0765

MARCH 2018

ABSTRACT

Commonwealth Heritage Group, Inc. (Commonwealth), completed an architectural survey for the proposed Spotsylvania Solar Energy Center in Spotsylvania County, Virginia. The survey was conducted for sPower Development Company, LLC (sPower), pursuant to an application to the Virginia State Corporation Commission (SCC). The work was conducted in a manner consistent with the requirements of the Code of Virginia, Section 10.1-1197.6 B7 and Administrative Code 9VAC15-60-40, Part B, Analyses of Historic Resources, as well as Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the Advisory Council on Historic Preservation's regulations for compliance with Section 106, codified as 36 CFR Part 800. Therefore, the survey work was conducted according to the Secretary of the Interior's *Standards and Guidelines for Historic Preservation Projects* (Federal Register, Vol. 48, No. 190, September 1983, P. 44716-44742, et seq.) as well as the Virginia Department of Historic Resources' (VDHR) 2017 *Guidelines for Conducting Historic Resources Survey in Virginia* and would meet necessary standards for review under Section 106 of the National Historic Preservation Act if the project were to become an undertaking. An archaeological survey for the project was also conducted and is reported separately. The cultural resources survey plan for the project was reviewed and approved in consultation with VDHR.

The purpose of the survey was to determine if above-ground architectural resources that are listed on, eligible for, or potentially eligible for the Virginia Landmarks Register or National Register of Historic Places (VLR/NRHP) are located within the project's Area of Potential Effects (APE). The study area for the project involves 6,350 acres. The project area forming the basis for the architectural APE is a smaller area and is based on mapping of discontinuous buildable areas supplied by sPower on August 24, 2017. These buildable areas total approximately 3,513.72 acres and represent the footprint of potential ground disturbing activities. For above-ground buildings, structures, districts, landscapes, and/or objects, the APE for architectural resources was defined, in consultation with VHDR, as subject to field observation and to include those resources 50 years of age or older with potential visual impacts based on the development within the project area/ buildable areas. The architectural survey was conducted between December 18, 2017 and January 3, 2018.

Three above-ground architectural resources were revisited as a result of the architectural survey. They include a ca. 1900 vernacular frame house at 14000 West Catharpin Road (VDHR# 088-5499). This, together with six newly recorded resources (VDHR#s 088-5505 through 088-5510), is part of the Paytes Crossroads Community (VDHR# 088-5504). The crossroads community includes mostly early to-mid-twentieth century residences and also a late twentieth-century commercial building, and is recommended as not eligible for the VLR/NRHP due to not being a distinctive and intact example of a crossroads community of its period. The individual resources in the community also do not appear eligible for the VLR/NRHP. The other previously recorded resources include a portion of the Spotsylvania Court House Battlefield (VDHR# 088-5182) and part of the Fredericksburg and Gordonsville Railroad (VDHR# 088-5364). The Spotsylvania Court House Battlefield section in the current project area represents a general avenue of overnight troop movement along an indeterminate route and is recommended as not contributing to any eligibility for the overall battlefield. The Fredericksburg and Gordonsville Railroad, which in the current project area consists of intact sections of the grade, is recommended as

contributing to the eligibility established previously for sections the railroad east of the project area. Minimal vegetative screening of solar array areas may be needed to maintain the current rural setting of the resource.

Seven other resources (including two cemeteries) were newly recorded as a result of the current survey. One of the newly recorded resources, a vernacular I-house at 10900 Buckland Road (VDHR# 088-5499), stands on land once owned by the Polish advocate, Confederate army officer, and Virginia immigration agent Gaspard Tochman. This dwelling, however, does not appear to have a demonstrable significant association with this historical figure. The remaining dwellings (VDHR#s 088-5500 through 088-5503) include a second vernacular house dating to the mid-nineteenth century, a vernacular I-house dating to 1902, and two Ranch-style houses dating the the 1960s. None of these are recommended as eligible for the VLR/NRHP, either due to diminished integrity or because they lack architectural significance. The cemeteries (VDHR#s 088-5512 and 088-5513) involve rough, uninscribed fieldstone markers and may date to the nineteenth and/or early twentieth centuries. Delineation of both to determine if unmarked burials are present is recommended, followed by avoidance measures as necessary. Because only limited information has been obtained, and it is understood that avoidance is the preferred option for these cemeteries, they have not been evaluated for VLR/NRHP eligibility.

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NCR-0765

June 2018

ABSTRACT

Commonwealth Heritage Group, Inc. (Commonwealth), completed an architectural survey for the proposed Spotsylvania Solar Energy Center in Spotsylvania County, Virginia. The survey was conducted for sPower Development Company, LLC (sPower), pursuant to an application to the Virginia State Corporation Commission (SCC). The work was conducted in a manner consistent with the requirements of the Code of Virginia, Section 10.1-1197.6 B7 and Administrative Code 9VAC15-60-40, Part B, Analyses of Historic Resources, as well as Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the Advisory Council on Historic Preservation's regulations for compliance with Section 106, codified as 36 CFR Part 800. Therefore, the survey work was conducted according to the Secretary of the Interior's *Standards and Guidelines for Historic Preservation Projects* (Federal Register, Vol. 48, No. 190, September 1983, P. 44716-44742, et seq.) as well as the Virginia Department of Historic Resources' (VDHR) 2017 *Guidelines for Conducting Historic Resources Survey in Virginia* and would meet necessary standards for review under Section 106 of the National Historic Preservation Act if the project were to become an undertaking. An archaeological survey for the project was also conducted and is reported separately. The cultural resources survey plan for the project was reviewed and approved in consultation with VDHR.

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contributing to the eligibility established previously for sections the railroad east of the project area. Minimal vegetative screening of solar array areas may be needed to maintain the current rural setting of the resource.

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Letter	Date	Purpose
DHR Clarification Letter - Railroads v180525	May 25, 2018	sPower letter to DHR clarifying how sPower intends to preserve the former Frederickburg and Gordonville Railroad
DHR Concurrence - Archaeological v180705	July 5, 2018	DHR concurrence with Archaeology
DHR Concurrence and Comments - Architecture v180803	August 3, 2018	DHR concurrence and comments on Architecture
DHR Concurrence - Archaeological Addendum and Architecure v180803	August 3, 2018	DHR concurrence with addendum survey for both Architecture and Archaeology
DHR Clarification Letter - Architecture v180807	August 7, 2018	sPower letter to DHR clarifying how sPower intended to preserve the farmhouse and cemeteries mentioned in DHR Concurrence - Architecture v180803
DHR Concurrence - Mitigation Measures v180910	September 10, 2018	DHR concurrence with sPower measures for preserving identified resources.

May 25, 2018

Ms. Julie V. Langan, Director
Attn: Mr. Roger Kirchen
Virginia Department of Historic Resources
2801 Kensington Avenue
Richmond, VA 23221

Project: Spotsylvania Solar Energy Center
County: Spotsylvania County, VA
Funding: Private
VDHR File: #2017-4023
Action Required: Effect Determination Request

Dear Mr. Kirchen,

We are writing in reference to the proposed Spotsylvania Solar Energy Center Project (Project) located in western Spotsylvania County, VA, pursuant to an application to the Virginia State Corporation Commission (SCC) and in accordance with consultation initiated with your office under VDHR File # 2017-4023.

This letter is in regards to the grade of the former Fredericksburg and Gordonville Railroad (VDHR# 088-5364) located north of the Project Site and recommended as contributing to the overall eligibility of the resource for the Virginia Landmarks Register (as outlined in our April 13, 2018 eligibility determination request). The following states what work sPower intends to do in the vicinity of the railroad and how sPower will preserve the setting:

- The proposed work in the area of the railroad only consists of a temporary road crossing used during construction. There is an existing wetland and resource protection area (RPA) buffer that runs through and just south of the railroad, which will create a natural buffer between the Project's final limits and the railroad. Below is an image of the area. In most cases, the RPA buffer will be in excess of 200 feet.
- sPower is planning to have the temporary road at existing grade as much as possible. Since there is already a logging road in this area, sPower believes the existing grading will be sufficient to place our proposed road. The road will likely consist of gravel (not natural ground), and not require digging. Once the Project completes construction and is operational, sPower will remove the gravel with the intent on limiting the disturbance to the natural ground.



We propose that based on the current plans for the solar facility there will be no adverse effect to this historic resource. We invite you to concur with this recommendation at your earliest convenience. To that end, we would appreciate efforts made to provide a response within 30 days of receipt of this letter, if possible.. Please contact me at (562) 348-1118 or afurman@spower.com should you have any questions or concerns. Specific questions regarding individual resources or the cultural resources survey may also be directed to Susan Bamann of Commonwealth at (252) 641-1444 x. 21 or susanbamann@chg-inc.com.



This document, together with the concepts and design presented herein, is prepared only for the specific purpose and client for which it was prepared. Review of and improper reliance on this document without written authorization and approval by Kimley-Horn and Associates, Inc. shall be without liability to Kimley-Horn and Associates, Inc.

LEGEND

-  PERMANENT WETLAND CROSSING
-  WETLAND
-  100' RPA BUFFER
-  50' NATURAL BUFFER
-  PROJECT PARCEL LIMIT
-  FENCE LINE
-  EXISTING GRAVEL ROAD
-  MAIN ACCESS ROAD
-  PANEL LIMITS

NOTES

- THE PROPOSED WORK IN THE AREA OF THE RAILROAD CONSISTS OF A TEMPORARY ROAD CROSSING. THERE IS A WETLAND AND RPA THAT RUNS THROUGH THE AREA JUST SOUTH OF THE RAILROAD, AND THIS WILL CREATE A NATURAL BUFFER BETWEEN THE PROJECT LIMITS AND THE RAILROAD.
- THE PROPOSED ROAD WILL MATCH EXISTING GRADE AS CLOSELY AS POSSIBLE AND WILL BE CONSTRUCTED USING STONE. THIS STONE WILL BE REMOVED UPON PROJECT COMPLETION TO LIMIT THE DISTURBANCE OF THE NATURAL GROUND.

HISTORIC RAILROAD CORRIDOR

 	<p>SPOTSYLVANIA SOLAR ENERGY CENTER SPOTSYLVANIA COUNTY, VA</p>	<p>HISTORIC RAILROAD CORRIDOR BUFFER EXHIBIT</p>	KHA PROJECT 116626000
			DATE 05/14/2018
			SCALE 1 IN = 150 FT
			DESIGNED BY KAM
			DRAWN BY KAM
			CHECKED BY SMM



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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

July 5, 2018

Mr. Adam Furman
sPower
2180 South 1300 East, Suite 600
Salt Lake City, UT 84106

RE: *Archaeological Survey Proposed Spotsylvania Solar Energy Center, Spotsylvania County, VA*
DHR File No. 2017-4023

Dear Mr. Furman:

We have received for review the document referenced above prepared by Commonwealth Heritage Group in accordance with the approved Cultural Resources Survey Plan. It is our opinion that this study meets all applicable standards and guidelines. Our comments are provided as assistance to sPower in the preparation of an application to the State Corporation Commission (SCC).

The archaeological survey of the 3,513-acre project area identified 58 sites and 98 artifact locations. The locations are, by definition, not eligible for listing in the Virginia Landmarks Register (VLR) or National Register of Historic Places (NRHP) and no further consideration of these resources is warranted. Of the 58 archaeological sites, one (1) was previously identified. Thirty-eight of the sites are Native American in origin and 20 are historic. Ten of the historic sites are associated with gold prospecting or mining and we accept the criteria for evaluating these types of sites as presented in Section 4.1.5 of the report. The consultant recommends all identified sites as not eligible for VLR/NRHP listing. Based on the information provided, we concur that sites **44SP0104** and **44SP0709 through 44SP0765, inclusive**, are *not eligible* for VLR/NRHP listing.

If you have any questions regarding these comments or our review of this project, please contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger W. Kirchen".

Roger W. Kirchen, Director
Review and Compliance Division

c. Ms. Susan E. Baumann, CHG

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

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

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



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

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Tel: (804) 367-2323
Fax: (804) 367-2391
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July 5, 2018

Mr. Adam Furman
sPower
2180 South 1300 East, Suite 600
Salt Lake City, UT 84106

RE: *Archaeological Survey Proposed Spotsylvania Solar Energy Center, Spotsylvania County, VA*
DHR File No. 2017-4023

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We have received for review the document referenced above prepared by Commonwealth Heritage Group in accordance with the approved Cultural Resources Survey Plan. It is our opinion that this study meets all applicable standards and guidelines. Our comments are provided as assistance to sPower in the preparation of an application to the State Corporation Commission (SCC).

The archaeological survey of the 3,513-acre project area identified 58 sites and 98 artifact locations. The locations are, by definition, not eligible for listing in the Virginia Landmarks Register (VLR) or National Register of Historic Places (NRHP) and no further consideration of these resources is warranted. Of the 58 archaeological sites, one (1) was previously identified. Thirty-eight of the sites are Native American in origin and 20 are historic. Ten of the historic sites are associated with gold prospecting or mining and we accept the criteria for evaluating these types of sites as presented in Section 4.1.5 of the report. The consultant recommends all identified sites as not eligible for VLR/NRHP listing. Based on the information provided, we concur that sites **44SP0104 and 44SP0709 through 44SP0765, inclusive**, are *not eligible* for VLR/NRHP listing.

If you have any questions regarding these comments or our review of this project, please contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger W. Kirchen".

Roger W. Kirchen, Director
Review and Compliance Division

c. Ms. Susan E. Baumann, CHG

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

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

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



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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

August 3, 2018

Mr. Adam Furman
sPower
2180 South 1300 East, Suite 600
Salt Lake City, UT 84106

RE: *Cultural Resources Survey Addendum, Proposed Spotsylvania Solar Energy Center, Spotsylvania County, Virginia*
DHR File No. 2017-4023

Dear Mr. Furman:

We have received for review the document referenced above prepared by Commonwealth Heritage Group in accordance with the approved Cultural Resources Survey Plan. This additional survey covers a 1,111-acre expansion of buildable area in the vicinity of the previously surveyed area. It is our opinion that this study meets all applicable standards and guidelines. Our comments are provided as assistance to sPower in the preparation of an application to the State Corporation Commission (SCC).

The archaeological survey identified one (1) previously recorded site, 12 newly recorded sites, and six (6) artifact locations. One additional previously recorded site (44SP0177) mapped within the study area was not relocated and is presumed destroyed or mis-mapped. No further consideration of site 44SP0177 is warranted. The artifact locations are, by definition, not eligible for listing in the Virginia Landmarks Register (VLR) or National Register of Historic Places (NRHP) and no further consideration of these resources is warranted. The consultant recommends and DHR concurs that the following sites are *not eligible* for VLR/NRHP listing: **44SP0176** and **44SP0769 through 44SP00780, inclusive**.

Regarding the additional architectural analysis, provided sPower adheres to the construction plans for the road crossing the Fredericksburg and Gordonsville Railroad (DHR ID #088-5364), as outlined in their letter dated May 25, 2018, there should be no adverse impact to the resource. Based on the information provided, we agree that the Spotsylvania Court House Battlefield (DHR ID #088-5182) and the Wilderness Battlefield (DHR ID #088-5183) will not be adversely impacted by the expanded project.

If you have any questions regarding these comments, please contact me at roger.kirchen@dhr.virginia.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger W. Kirchen".

Roger W. Kirchen, Director
Review and Compliance Division

c. Ms. Susan E. Baumann, CHG

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

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5357 Main Street
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Stephens City, VA 22655
Tel: (540) 868-7029
Fax: (540) 868-7033

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



COMMONWEALTH of VIRGINIA

Matthew Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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

August 3, 2018

Ms. Susan E. Baumann
Commonwealth Heritage Group, Inc.
P.O. Box 1198
Tarboro, NC 27886

RE: *Phase I Architectural Survey of the Spotsylvania Solar Energy Center, Spotsylvania County, Virginia*
(Revised)
DHR File No. 2017-4023

Dear Ms. Baumann:

We have received for review the report referenced above prepared by Commonwealth Heritage Group, Inc. (CHG) for Sustainable Power Group (sPower), in support of an application to the Virginia State Corporation Commission (SCC) for a privately funded solar energy facility in Spotsylvania County. We have reviewed the submitted materials and provide the following comments.

The architectural survey within the viewshed of the project identified three (3) previously recorded resources and fourteen (14) newly recorded resources. DHR concurs with many of CHG's eligibility recommendations (see attached table), but offers the following comments:

- DHR ID #088-0167 is not individually eligible based on the submitted information; however, it could contribute to a potential rural historic district. Based on the viewshed information provided, there will be no impact on this resource
- DHR ID #088-5502 is not individually eligible based on the submitted information; however, it could contribute to a potential rural historic district. Land-clearing activities for the project may result in an adverse visual impact to this resource. This can be avoided by leaving trees in place to create a visual buffer.
- The two cemeteries (DHR ID #s 088-5512 and 088-5513) should be delineated and avoided. Unless we are confident in the horizontal limits of human burials, we generally recommend no less than a 50- to 100-foot buffer around cemeteries.
- Table 1 of the report contains incorrect construction dates for seven resources, which should be changed to reflect the VCRIS survey data.

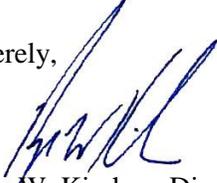
Western Region Office
962 Kime Lane
Salem, VA 24153
Tel: (540) 387-5443
Fax: (540) 387-5446

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

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

Please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov with questions regarding these comments.

Sincerely,



Roger W. Kirchen, Director
Review and Compliance Division

c. Mr. Adam Furman, sPower

ATTACHMENT
August 3, 2018
DHR File No. 2017-4023

DHR ID #	Resource Name/Type, Location	Date	CHG Eligibility July 2018	DHR Eligibility July 2018	DHR Impact August 2018
088-0167	House, 14000 West Catharpin Road	ca. 1900	Ineligible	Not Individually Eligible; Possible RHD	No Adverse Impact
088-5182	Spotsylvania Court House Battlefield	1864	Not contributing	Potentially Eligible (2007)	No Adverse Impact
088-5364	Fredericksburg & Gordonsville Railroad, Fredericksburg, Spotsylvania, and Orange Counties	Post 1853	Contributing	Eligible (2011)	Potential Adverse Impact; Vegetative screening
088-5499	House, 10900 Buckland Road	ca. 1900	Ineligible	Ineligible	N/A
088-5500	House, 10200 Tall Oaks Drive	ca. 1900	Ineligible	Ineligible	N/A
088-5501	House, 13829 Post Oak Road	1961	Ineligible	Ineligible	N/A
088-5502	House, 10365 Gold Dale Road	1902	Ineligible	Not Individually Eligible; Possible RHD	Potential Adverse Impact; Vegetative Screening
088-5503	House, 10276 Gold Dale Road	1960	Ineligible	Ineligible	N/A
088-5504	Paytes Crossroads Community, West Catharpin Road and Post Oak Road	ca. 1900	Ineligible	Ineligible	N/A
088-5505	House, 14015 West Catharpin Road	1965	Ineligible	Ineligible	N/A
088-5506	House, 14011 West Catharpin Road	1926	Ineligible	Ineligible	N/A
088-5507	House, 14010 West Catharpin Road	ca. 1960	Ineligible	Ineligible	N/A
088-5508	House, 14020 West Catharpin Road	1955	Ineligible	Ineligible	N/A
088-5509	Keystone Grocery, 14008 West Catharpin Road	1983	Ineligible	Ineligible	N/A
088-5510	House, 14007 West Catharpin Road	ca. 1940	Ineligible	Ineligible	N/A
088-5512	Historic Cemetery, Old Travelers Spur Road	ca. 1850	Unevaluated	Ineligible; Avoid	Delineate; Avoid
088-5513	Historic Cemetery, Chancellor Meadows Lane	ca. 1880	Unevaluated	Ineligible; Avoid	Delineate; Avoid

August 7, 2018

Mr. Roger W. Kirchen
Virginia Department of Historic Resources
Review and Compliance Division
2801 Kensington Avenue
Richmond, VA 23221

Project: Spotsylvania Solar Energy Center
County: Spotsylvania County, VA
Funding: Private
VDHR File: #2017-4023
Subject: Response to VDHR Comment Letter dated August 3, 2018

Dear Mr. Kirchen,

We are writing in reference to the proposed Spotsylvania Solar Energy Center Project (Project) located in western Spotsylvania County, VA, pursuant to an application to the Virginia State Corporation Commission (SCC) and in accordance with consultation initiated with your office under VDHR File # 2017-4023. This letter is in response to the Virginia Department of Historic Resources' (VDHR) comment letter dated August 3, 2018.

- **DHR ID #088-5502 – Farmhouse along Gold Dale Lane**

The Project will not be visible from DHR ID #088-5502 based on the Project's current design. Refer to Exhibit A for the Project's current design. Sheet Number EX-1-1 on Exhibit A indicates that the nearest project boundary line to DHR ID #088-5502 is approximately 0.70 miles to the south. In between the Project and DHR ID #088-5502 will be natural vegetation with varying topography. Furthermore, solar panels will not be constructed on north-facing slopes, and therefore are not expected to be visible from DHR ID #088-5502, which is to the north of the nearest project boundary line. Additionally, Sheet Number EX-2-1 on Exhibit A shows the Project's proposed Landscape and Buffer Area Plan. As indicated on Sheet Number EX-2-1, the Project will maintain minimum 50-foot setbacks of natural vegetation. During the lifetime of the Project, sPower will maintain the natural vegetation setbacks as part of on-going compliance per its Special Use Permits. Therefore, the Project will not be visible to DHR ID #088-5502 due to its distance, natural vegetation and topography, and the preservation of minimum 50-foot setbacks.

sPower is not the current landowner of the Project Site, and therefore has limited control regarding its current timber operations. sPower will be purchasing the land upon approval



of its Special Use Permits and Building Permits. At which time, timber operations will cease and vegetation will be allowed to regrow under natural conditions.

- **DHR ID #s 088-5512 and 088-5513**

Sheet Numbers EX-1-4 and EX-1-6 show the location of DHR ID #s 088-5512 and 088-5513. DHR ID #088-5512 on Sheet Number EX-1-6 and DHR ID #088-5513 on Sheet Number EX-1-4 are shown as having minimum 100-ft buffers. Construction and operations personnel will be made aware of the cemetery locations and will be instructed to avoid them. In the event previously unidentified resources are discovered during construction or operations, sPower will immediately coordinate with the proper regulatory authorities.

sPower proposes that based on the Project's current design, there will be no adverse impact to these historic resources. We invite you to concur with this recommendation at your earliest convenience. Please contact me at (562) 348-1118 or afurman@spower.com should you have any questions or concerns. Specific questions regarding individual resources or the cultural resources survey may also be directed to Susan Bamann of Commonwealth at (252) 641-1444 x. 21 or susanbamann@chg-inc.com.

Adam Furman
Assistance Permitting Manager
Sustainable Power Group (sPower)

Exhibit A

Site Plan



COMMONWEALTH of VIRGINIA

Matt Strickler
Secretary of Natural Resources

Department of Historic Resources
2801 Kensington Avenue, Richmond, Virginia 23221

Julie V. Langan
Director

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

September 10, 2018

Mr. Adam Furman
sPower
2180 South 1300 East, Suite 600
Salt Lake City, UT 84106

RE: Spotsylvania Solar Energy Center - Response to VHDR Comments
Spotsylvania County, Virginia
DHR File No. 2017-4023

Dear Mr. Furman:

We have received for review the materials referenced above prepared by Commonwealth Heritage Group, Inc. (Commonwealth) for Sustainable Power Group (sPower), in support of an application to the Virginia State Corporation Commission (SCC) for a solar energy facility in Spotsylvania County. We have reviewed the submitted materials and provide the following comments.

- The revisions to Table 3.2-1 correct the construction dates and are much appreciated.
- Dwelling, 10365 Gold Dale Lane (DHR ID# 088-5502): Based on the information provided in sPower's letter dated August 7, 2018 and the accompanying Project Sheets EX-1-1 and EX-2-1, the solar arrays should not have a visual impact on this resource. We concur with the recommendation of no adverse impact for this resource.
- Cemeteries (DHR ID#s 088-5512 and 088-5513): Based on the 100-foot buffer illustrated in Project Sheets EX-1-4 and EX-1-6, these resources should be adequately protected during construction and operation. We recommend cordoning off the cemeteries with high-visibility fencing during construction as an additional avoidance measure.

Please do not hesitate to contact me at roger.kirchen@dhr.virginia.gov with questions regarding impact minimization and mitigation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Roger W. Kirchen".

Roger W. Kirchen, Director
Review and Compliance Division

c. Susan Bamann, Commonwealth

Western Region Office
962 Kime Lane
Salem, VA 24153
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