



September 19, 2022

Ms. Regena Bronson  
U.S. Army Corps of Engineers  
1329 Alum Spring Road  
Suite 102  
Fredericksburg, VA 22401

Re: Route 15 Widening – Battlefield Parkway to Whites Ferry Road  
Corps Project No. 2020-00657  
DHR File No. 2022-4445

Dear Ms. Bronson,

Thank you for sharing documents related to the proposal by Loudoun County (County) to widen a segment of Route 15, and the review that the Army Corps of Engineers (Corps) is conducting of that project pursuant to Section 106 of the National Historic Preservation Act (NHPA). The National Trust for Historic Preservation forwarded the documents received from you to the Journey Through Hallowed Ground, the Catoctin Coalition, the Piedmont Environmental Council, Southern Environmental Law Center, and the Coalition for Smarter Growth, and this letter represents all six organizations’ joint comments on the materials you shared. In addition, all of our organizations would like to participate in the review process as “consulting parties” under Section 106 of the NHPA, pursuant to 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3).

At the outset, we wish to voice our strong concern that the County is attempting to segment its project to widen Route 15 between Battlefield Parkway and Montresor Road into two separate but clearly inter-dependent “phases” in order to minimize the environmental and historic impact review requirements under the Clean Water Act (CWA), the National Environmental Policy Act (NEPA), and the National Historic Preservation Act (NHPA). The County’s apparent attempt to segment the Corps’ required permitting review between two separate “phases” of the project is impermissible and must be rejected.

As for the documentation you have provided us relating to the Section 106 review that the Corps has initiated, we agree with the Virginia Department of Historic Resources (VDHR) that the Area of Potential Effects (APE) that the Corps has identified is far too constrained to allow for proper consideration of the potential effects to historic properties resulting from even just the first “phase” of the Route 15 widening.

In light of these serious concerns, we strongly urge the Corps to require the County to apply for an individual CWA Section 404 permit that includes both “phases” of its Route 15 widening project so that the project’s full environmental and historic resource impacts—and strategies to help avoid and minimize those impacts—can be properly evaluated. Further, the Section 106 review for the project should be based on an expanded APE that includes the full project area along Route 15 (including the portion extending between Whites Ferry Road and Montresor Road) and allows for consideration of both the direct and indirect and cumulative effects of the widening proposal.

**I. The Corps Must Reject the County’s Attempt to Impermissibly Segment the Route 15 Widening Project.**

As part of its review of a joint permit application, the Corps must ensure compliance with NEPA and assess whether the environmental impacts of the proposed action are “significant” and therefore require the preparation of an environmental impact statement.<sup>1</sup> The scope of the project that the applicant proposes for the “action” in its application—and which the Corps must decide whether to accept—is important. An agency may not “divid[e] one project into multiple individual actions ‘each of which individually has an insignificant environmental impact, but which collectively have a substantial impact.’”<sup>2</sup> Otherwise, permit applicants could avoid review of the full environmental impacts of their proposals, contravening NEPA and undermining the purposes of the impact reviews required under the CWA and the NHPA.

The precise standards for determining when illegal segmentation has occurred vary somewhat across agencies, but the separation of inter-dependent parts or phases of a larger project is a common thread. The Council on Environmental Quality (CEQ)’s NEPA regulations make clear that two proposed actions are “connected,” and that their impacts must therefore be assessed in the same environmental review, when “they are interdependent parts of a larger action and depend on the larger action for their justification.”<sup>3</sup> The Corps’ articulation of this standard is reflected in the definition of “independent utility” included in its recently adopted statewide programmatic general permit for linear transportation projects (22-SPGP-LT): “[a] project is considered to have independent utility if it would be constructed absent the construction of other projects in the project area.”<sup>4</sup> The definition clarifies that “[p]ortions of a

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<sup>1</sup> 42 U.S.C. §§ 4321 et seq.

<sup>2</sup> *Nat. Res. Def. Council, Inc. v. Hodel*, 865 F.2d 288, 297 (D.C. Cir. 1988) (quoting *Thomas v. Peterson*, 753 F.2d 754, 758 (9th Cir. 1985)).

<sup>3</sup> 40 C.F.R. § 1501.9(e)(1)(iii).

<sup>4</sup> CENAO-WRR State Programmatic General Permit - Linear Transportation (22 SPGP-LT), at § V.6.

multi-phase project that depend upon other phases of the project do *not* have independent utility.”<sup>5</sup> Similarly, when asked to determine whether the Corps has engaged in improper segmentation in cases challenging Clean Water Act permits granted for road projects, courts have assessed whether the road project had “independent utility” or “logical termini.”<sup>6</sup>

The history of the County’s project to widen Route 15 between Battlefield Parkway and Montresor Road demonstrates that the County decided against widening Route 15 only as far north as Whites Ferry Road—the proposal that the County has submitted in its joint permit application—specifically because the widening needed to extend further north in order to be effective. In other words, the County itself determined that Whites Ferry Road was not a practical or logical terminus for the widening, and that a project to widen Route 15 only to Whites Ferry Road lacked independent utility from a transportation perspective.

More specifically, the County’s project to widen Route 15 between Battlefield Parkway and Montresor Road was born out of the 2017 study, labeled “Route 15 Congestion Report,” that the County conducted of the Route 15 corridor.<sup>7</sup> As reflected by the study’s subtitle—“Between Battlefield Parkway and Whites Ferry Road/Raspberry Drive”—the County was initially considering widening Route 15 only as far north as Whites Ferry Road. However, the study ultimately determined that any widening proposal would need to extend to a point at least 2,000 feet north of the Route 15/Whites Ferry Road intersection. Otherwise, the northbound traffic queues that would form where the highway transitioned back down to two lanes would “spill back” on Route 15 to an extent that would negatively impact intersection operations to the south.<sup>8</sup> Significantly, the study determined that the queuing of northbound traffic would be a problem even under near-term (year 2020) traffic projections,<sup>9</sup> effectively meaning that any widening project that didn’t extend at least 2,000 feet beyond Whites Ferry Road would already be inadequate by the time it was completed.

The County’s Route 15 Congestion study further indicated that even widening Route 15 to a transition point 2,000 feet north of Whites Ferry Road would not address the failing level of service that was already occurring in 2017 at the Route 15/Montresor Road intersection.<sup>10</sup> But

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<sup>5</sup> *Id.* (emphasis added).

<sup>6</sup> See, e.g., *Fla. Wildlife Fed’n v. U.S. Army Corps of Eng’rs*, 401 F. Supp. 2d 1298 (S.D. Fla. 2005).

<sup>7</sup> *Route 15 Congestion Report – Between Battlefield Parkway and Whites Ferry Road/Raspberry Drive*, prepared by Kimley Horn for Loudoun County Board of Supervisors (May 18, 2017) (hereafter referred to as “Route 15 Congestion Report”), available starting at p. 10 of County staff report titled “Route 15 Congestion Report Findings” presented to County Board of Supervisors for its May 18, 2017 business meeting, which itself is available at <https://lfportal.loudoun.gov/LFPortalinternet/0/edoc/218963/Item%2006%20Route%2015%20Congestion%20Report%20Findings.pdf>.

<sup>8</sup> *Route 15 Congestion Report* at p. 53 (“[If] the lane drop is located approximately 2,000 feet north of the US Route 15 and Whites Ferry Road/Raspberry Drive intersection, this queuing will not typically spill back to impact the intersection operations.”), and at p. 66 (“[Q]ueuing at the lane drop indicates that the improvements should be implemented at least 2,000 feet north of Whites Ferry Road to avoid queuing impacts at the intersection.”)

<sup>9</sup> *Route 15 Congestion Report* at p. 53.

<sup>10</sup> See County staff report titled “Route 15 - Congestion Report Improvements” presented to County Board of Supervisors for its Sept. 20, 2018 business meeting, at p. 9 (available at <https://lfportal.loudoun.gov/LFPortalinternet/0/edoc/302671/Item%2007%20Rt%2015%20Congestion%20Report%20Scope%20of%20Improvements.pdf>).

when the study modeled the widening of Route 15 to the Montresor Road intersection, the results indicated that the project would be able to effectively handle the projected traffic demand through the year 2030.<sup>11</sup> Based on the results of the study, County staff recommended—and on September 20, 2018, the County Board unanimously approved—a project to widen Route 15 between Battlefield Parkway and Montresor Road.<sup>12</sup>

In summary, the County decided to widen Route 15 to Montresor Road specifically because its own traffic study of the corridor demonstrated that terminating the widening at Whites Ferry Road would result in unacceptable intersection operations to the south—even under near-term (year 2020) traffic projections. The County concluded that widening Route 15 must extend further north to function effectively through 2030.

It should be noted that, in February 2021, a County staff report indicated that a phasing plan had been developed for construction of its Route 15 widening project because “[right-of-way] acquisition and utility relocation is more challenging north of Whites Ferry Road/Raspberry Drive.”<sup>13</sup> According to that staff report, the phasing plan would allow the portion of the project between Battlefield Parkway and Whites Ferry Road (“Phase 1”) to begin a year or two sooner than the portion between Whites Ferry Road and Montresor Road (“Phase 2”). However, the staff report still referred to the two phases as being part of the same “Route 15 – Battlefield Parkway to Montresor Road widening project,” and it gave no indication that the County might attempt to segment the Corps’ required permitting review of the project into two different phases as well.<sup>14</sup> Further, the slideshow presentation that staff presented to the Board at

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<sup>11</sup> *Route 15 Congestion Report* at p. 56.

<sup>12</sup> *Supra* note 10. See also Copy Teste of Board’s Sept. 20, 2018 motion on this item, available at <https://lfportal.loudoun.gov/LFPortalinternet/0/edoc/303468/Item%2007%20Rt%2015%20Congestion%20Report%20Improvements%20.pdf>. See also County’s “Route 15 North Widening: Battlefield Pkwy. to Montresor Rd.” webpage, available at <https://www.loudoun.gov/route15northwidening> (“The results of the Route 15 North Congestion Report, initiated to reduce traffic between Battlefield Parkway and Whites Ferry Road, were presented to the Board of Supervisors in May 2017. Recommendations from the report included widening Route 15 from two to four lanes between Battlefield Parkway and Montresor Road.”)

<sup>13</sup> See County staff report titled “Route 15 – Battlefield Parkway to Montresor Road Widening Project Location and Design Endorsement” presented to County Board of Supervisors for its Feb. 2, 2021 business meeting, at p. 4 (available at <https://lfportal.loudoun.gov/LFPortalinternet/0/edoc/476649/Item%2007%20Rt%2015-Battlefield%20Pkw%20to%20Montresor%20Rd%20Widening%20Project%20Location%20Design%20Endorsement.pdf>).

<sup>14</sup> We are not aware of any other generally available public document that the County or the Corps produced indicating that the County planned to submit separate permit applications for the two phases of the project. Notably, beginning as far back as December 2018, our organizations (either individually or jointly) have written a number of letters and emails to the County—and the Corps—seeking information and updates on the County’s plans and timing for applying for the CWA permit. In none of the County’s responses did it indicate that it planned to submit separate CWA permitting applications for the two phases of the project. In a May 24, 2022 email, we even specifically asked “if the county planned to submit both segments of the project to the Corps for Clean Water Act permitting at the same time, or if the county is considering proceeding to permitting of the two segments on different timelines.” (Email on file with our organizations.) In that same message, we explicitly urged the County to submit both segments for permitting at the same time in order to ensure the Corps’ compliance with NEPA, the CWA, and the NHPA. The County never responded to our inquiry, and it was not until the Corps forwarded us a portion of the County’s joint permit application (as part the Section 106 documents you shared with us on September 2) that we learned the County was attempting to segment the Corps’ review of the project into two separate permit applications.

that meeting specifically recommended “[m]aintain[ing] the project scope authorized by the Board on September 20, 2018.”<sup>15</sup> The fact that the County intends to begin construction of Phase 2 at or around the same time it is completing Phase 1 confirms that the two phases are still part of the same generally continuous action, and that the County recognizes the necessity of constructing Phase 2 following closely on the heels of Phase 1.<sup>16</sup> Indeed, the County’s own website on the project continues to list the widening from Battlefield Parkway to Montresor Road as a single project.<sup>17</sup>

Given that the two phases are inter-dependent portions of the larger Route 15 widening project, we urge the Corps to reject the County’s attempt to segment the Corps’ permitting review. The full impacts of the two phases must be evaluated together as part of the single project they constitute.

## **II. The Statewide Programmatic General Permit is Not Appropriate for the Proposed Project.**

Even if the two phases of the Route 15 widening project could be shown to have independent utility, the Corps is required to evaluate the impacts of the two phases together regardless. This is because the Corps must consider the project’s “cumulative effects”—those environmental impacts, as CEQ defines it, “that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions.”<sup>18</sup> Here, both of the County’s Route 15 widening phases clearly qualify as reasonably foreseeable actions, so a review of the impacts of one phase must include the impacts of the other.

Notably, if the cumulative impacts are anything more than “minimal,” then by its own terms the 2022-SPGP-LT may not be used for the project.<sup>19</sup> As explained below, we believe the impacts of the full Route 15 widening project—regardless of whether they are viewed cumulatively as the effects of the County’s two proposed project phases, or as the impacts of the project as a single whole—are likely to be “significant” and therefore trigger the preparation of an environmental impact statement. We have little doubt, in any event, that the project’s cumulative impacts would far exceed any reasonable definition of “minimal,” thereby rendering both phases ineligible for the SPGP and triggering the requirement for an individual permit under the CWA and an environmental assessment under NEPA.

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<sup>15</sup> See County staff presentation to County Board labeled “Route 15 – Battlefield Parkway to Montresor Road Location and Design Endorsement” (Feb. 2, 2021), Slide 10, available at <https://lfportal.loudoun.gov/LFPortalinternet/0/edoc/477416/Item%2007%20Rt%2015-Battlefield%20Pkwy%20to%20Montresor%20Rd%20Widening%20Project-Staff%20Presentation.pdf>.

<sup>16</sup> See “Current Status” section of County’s Route 15 North Widening: Battlefield Pkwy. to Montresor Rd. webpage, available at <https://www.loudoun.gov/route15northwidening>, which states that Phase I construction is estimated to take place from 2024 to 2026, and Phase II construction is estimated to occur from 2026 to 2028.

<sup>17</sup> See <https://www.loudoun.gov/route15northwidening>. (The webpage is titled “Route 15 North Widening: Battlefield Pkwy. to Montresor Rd.” and refers repeatedly to the widening as a single “project.”)

<sup>18</sup> 40 C.F.R. § 1508.1(g)(3) (2022); 36 C.F.R. § 800.5(a)(1).

<sup>19</sup> Section I.B of 22-SPGP0-LT is clear that “projects must have no more than minimal individual *and cumulative* impacts” to potentially be eligible. (Emphasis added).

Looking just at Phase 1’s direct impacts to waters of the U.S. (WOTUS), there are at least four WOTUS impact areas spread across its approximately 1.5-mile distance. Phase 2 will directly impact additional jurisdictional waters—including a potentially significant impact to the segment of Limestone Branch that flows parallel to Route 15 and then crosses underneath the road approximately 2,600 feet south of the Montresor Road/Route 15 intersection. The extent of the impacts to Limestone Branch are unclear at this point (precisely because the County is attempting to delay an assessment of those impacts until a later time), but given that the County is “redesigning the Route 15 crossing of Limestone Branch from an extension of the existing box culvert to a new bridge,”<sup>20</sup> that single impact alone could easily surpass “minimal.”

Further, the project’s impacts are not limited to waters of the U.S. The Section 106 coordination form you provided, and the August 18 letter from DHR, list a number of known historic properties that would be directly impacted even by Phase 1 of the project. These include the Ball’s Bluff Battlefield Historic District National Historic Landmark<sup>21</sup> (053-058/253-5182), the Catoctin Rural Historic District (053-0012), and Morven Park (053-0087). They also include several properties that are contributing or potential contributing resources to the historic district (053-0255, 053-0299, 053-0297).

Phase 2 of the project directly impacts at least two additional historic properties. These include the Rockland property, which has been listed in the National Register since 1987. The Rockland property boundary includes land on both sides of Route 15 where Limestone Branch crosses under Route 15. The “Overseer’s House” (which is noted in the National Register Nomination Form as “contributing” to the Rockland property’s significance), is located in particularly close proximity to the stream crossing, and both the main Manor Home and the Overseer’s House are located only a few hundred feet from the roadway.

A second historic property—Macaria—borders the western side of Route 15 just northwest of the Rockland property and approximately 1,800 feet south of the Route 15/Montresor Road intersection. The property was determined eligible for the National Register in 1998. Limestone Branch flows across the southern portion of the Macaria property just before its boundary with Rockland near where the stream crosses under Route 15.

Notably, the County’s Route 15 widening webpage includes a link to a 30% design plan for the segment of the project located between Whites Ferry Road and Montresor Road.<sup>22</sup> The plan shows “Proposed Development Outside The [Existing Route 15 Right-of-Way]” occurring

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<sup>20</sup> E-mail from Mark Hoffman, Design Program Manager, Loudoun County, to William Sellers, Executive Director, Journey Through Hallowed Ground Partnership (May 2, 2022) (email on file with our organizations).

<sup>21</sup> Significantly, the potential for direct adverse effects on an NHL requires inviting the National Park Service and the Advisory Council on Historic Preservation to participate directly in the Section 106 consultation, 36 C.F.R. § 800.10(b)-(c), but it is not clear from the documents we have been provided whether those agencies have been contacted.

<sup>22</sup> The 30 percent design plan is available directly at <https://www.loudoun.gov/DocumentCenter/View/160662/Route-15-widening---Phase-2----05-01-20>, or it can be accessed by clicking the link labeled “30% design exhibit for segment of project between Whites Ferry Road and Montresor Road to include relocation of Limestone School Road, and roundabout at Montresor Road” at <https://www.loudoun.gov/route15northwidening>.

on the Macaria and the Rockland properties, including an area of the Rockland property that currently consists of a cultivated stand of ornamental trees that helps shield the Rockland Manor Home and its landscaped gardens from views of the road, as well as within an area of vegetation that helps shield the Rockland “Overseer’s House” from views of the road.

Thus, even this cursory review of the WOTUS and historic property impacts resulting from the County’s proposed project to widen Route 15 to Montresor Road indicates that the impacts could rise to the level of “significance” under NEPA, regardless of whether they are attributed to a single project extending north to Montresor Road or viewed instead as the cumulative impacts of the two phases the County is actively pursuing. They clearly surpass the SPGP’s threshold of “minimal” in any event, so that the County may not use 22-SPGP-LT and must instead apply for an individual CWA permit, and an environmental assessment must be prepared under NEPA.

### **III. The Corps’ Area of Potential Effects for Its Section 106 Review is Inadequate.**

Finally, we also wish to provide comments on the Section 106 materials that the Corps has provided to date, notwithstanding our objection to the County’s attempted segmentation of the review. As discussed further below, we share the concern that the Virginia Department of Historic Resources (DHR) expressed in its August 18, 2022 letter to the Corps—namely, that the Corps’ decision to limit the Section 106 area of potential effects (APE) to the project’s immediate physical impacts to streams and wetlands does not allow for full consideration of the potential effects to historic properties that are subject to the Corps’ permitting action. We agree with DHR that the APE should be expanded to include the entire project area, and that it must address the potential visual effects of the project.

Based on the Section 106 documentation we were provided, the Corps’ assessment of potential impacts to historic resources located in the project area has been extremely limited. The “Section 106 Coordination Form” provides only a brief description of the direct effects to waters of the U.S. that would occur at four numbered “Impacts” in the project area. Similarly, the file we were provided that is labeled “2020-00654 PERMIT PLAN” consists of aerial design diagrams that focus only on the same four WOTUS “impacts” and their immediate vicinity.

We strongly agree with DHR that the APE must extend well beyond the limited areas where the Corps has focused its Section 106 review thus far. Notably, the Corps is required—even under its own regulations—to take into account the project’s effects “on historic properties both within *and beyond* waters of the U.S.”<sup>23</sup> Further, the Corps’ review must include consideration of the direct *and indirect* effects of the undertaking on historic resources inside *and outside* of the permit area.<sup>24</sup> The Section 106 regulations confirm that the Corps’ review is not

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<sup>23</sup> 33 C.F.R. pt. 325, app. C, § 2(a) (emphasis added).

<sup>24</sup> *Id.* § 1(e). Specifically, the Corps “will consider the effects of undertakings on any *known* historic properties that may occur outside the permit area,” *id.* § 5(f) (emphasis added). In this case, as DHR has noted, there are a number of known historic properties that extend or are located outside the permit area.

limited to just direct effects or to only those locations where jurisdictional waters and historic resources overlap within the project corridor. Yet that appears to have been the extent of the Section 106 review of this project to date.

Many of the historic resources that this project would impact are located immediately adjacent to the existing highway, and one—a National Historic Landmark (NHL), subject to stronger protection under Section 110(f) of the NHPA<sup>25</sup>—even straddles it. The project requires clearing and grading long strips of land located on some of these historic properties, as well as the conversion of the land to highway right-of-way. Roadside vegetation that currently provides both visual screening and noise buffering will need to be removed, exposing the properties to the sights and sounds of an expanded highway with double the number of traffic lanes. These impacts—and the serious potential for them to adversely affect the historic properties—cannot be ignored.

For example, there is a portion of Ball’s Bluff Battlefield Historic District National Historic Landmark that extends across Route 15 just north of Tutt Lane. The portion of the NHL district located on the western side of Route 15 extends north to include the Big Spring property, which is home to the Springwood mansion and archaeological site—both of which have been deemed eligible for listing on the National Register. These historic sites are identified as contributing resources to the NHL or as defining features of the Ball’s Bluff Battlefield landscape on the NHL nomination form.

Currently a stand of mature trees and vegetation is growing in the portion of the NHL that fronts the western edge of Route 15 to the north of Tutt Lane, and the vegetation is helping to block this portion of the property from views and sounds of Route 15. However, page 5 of the document provided to our groups labeled “2020-00657 PERMIT PLAN” shows that land disturbance and grading for the project will occur in this same area of the NHL, which would presumably result in the destruction and removal of a significant portion of this natural screen.

Another example is evident in Phase 2 of the County’s project. As mentioned above, the County’s 30% design plan for the portion of the project located between Whites Ferry Road and Montresor Road shows that existing vegetation on the eastern side of Route 15, which helps shield the Rockland property’s Manor Home and Overseer’s House from views of Route 15, is within the area where land disturbance for the road project will occur, negatively impacting this screening.

These and other similar impacts of the project have serious potential to adversely affect the historic properties located along the proposed project route, and they need to be assessed as part of the Section 106 review. But as DHR has pointed out, “the Corps’ decision to limit the APE for the undertaking to the immediate physical impacts to streams and wetlands” has not allowed the potential effects to historic properties to be fully considered. We therefore endorse DHR’s recommendation to expand the APE to include the entire project area and to address the potential visual effects of the project.

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<sup>25</sup> 54 U.S.C. § 306107.

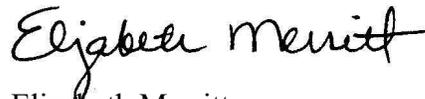
Further, if the use of an expanded APE indicates the possibility of adverse effects—which we believe is likely—then the Section 106 review will also need to consider options for avoiding, minimizing, and mitigating those impacts. Our organizations hereby request to be included in this and all other additional Section 106 consultation and correspondence for this project.

Thank you again for providing us with some of the Section 106 documentation for this project and inviting us to comment. As explained above, we urge the Corps to reject the County’s attempt to segment its proposal to widen Route 15 between Battlefield Parkway and Montresor Road into two separate phases and permitting processes. The Corps should instead require the County to apply for an individual CWA Section 404 permit that includes both phases of the project, allowing for proper evaluation of the project’s full environmental and historic resource impacts—and of strategies to help avoid and minimize them. Further, the Section 106 review for the project should be based on an expanded APE that includes the full project area along Route 15 (including the portion extending between Whites Ferry Road and Montresor Road) and allows for consideration of potential visual and audial impacts.

Sincerely,



Morgan Butler  
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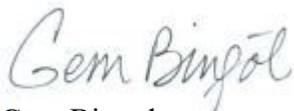
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