

MEMORANDUM

To: Rob Donaldson, Project Manager, Land Use Review

From: Steve Thompson, County Archaeologist, Community Planning

Date: August 24, 2022

Re: CMPT-2022-0003 & SPEX-2022-0038, Academies of Loudoun Service Center; Archaeology 1st Referral

BACKGROUND

The applicant is requesting a Commission Permit (CMPT) and Special Exception (SPEX) to allow a public utility service center with outdoor storage and small engine repair to be co-located on the Academies of Loudoun property, in the Transitional Residential-10 (TR-10) zoning district. The 119.26-acre subject property fronts on the west side of Sycolin Road between Gulick Mill Road to the north and Thunderball Drive to the south.

COMPLIANCE WITH THE COMPREHENSIVE PLAN

The *Loudoun County 2019 General Plan* (2019 GP) calls for the conservation and preservation of the County's cultural and scenic resources. Land development applications are required to include an archaeological and historic resources survey to identify resources and, if warranted, identify measures for preservation, mitigation, and adaptive reuse (*2019 GP, Chapter 3, Historic, Archaeologic, and Scenic Resources, Action 5.1.C*). The *Loudoun County Heritage Preservation Plan* (HPP) provides additional detail regarding survey requirements (*HPP, Chapter 2, Archaeological Resources, Policy 3*). The HPP further articulates policies regarding the preservation of significant heritage resources in the context of land development (*HPP, Chapter 9, Development Review*). Loudoun County's *Revised 1993 Zoning Ordinance* (Section 5-1405) and the requirements for archaeological survey detailed in Section 7.810 of the County's *Facilities Standards Manual* provide additional guidance for the identification and protection of cemeteries, burial grounds, and graves during the land development application process.

In compliance with the 2019 GP, the applicant has submitted a Phase I cultural resources survey report prepared by Dovetail Cultural Resource Group in January 2015 titled *Phase IB Cultural Resource Survey of the 119-Acre Academies of Loudoun Project Area, Loudoun County, Virginia*. This report was previously submitted under CMPT-2015-0002 and CPAP-2015-0028.

ANALYSIS

Dovetail's Phase I cultural resources survey included background documentary research to establish environmental and historical context, pedestrian reconnaissance and visual inspection of the entire property, and systematic shovel testing at 50-ft intervals across all terrain not characterized by excessive slope, poor drainage, or prior disturbance. The study also included recordation of all buildings and structures greater than 50 years in age. The Phase I survey identified no archaeological sites, cemeteries, burial grounds, graves, or other significant historic or cultural resources on the property. The presence of the Etcher Cemetery (VDHR Resource 053-6361; Loudoun County ID PCEM-1998-0048) on PIN 195-49-0704 adjoining the subject property to the east was noted. A penetrometer survey within the subject property adjoining the cemetery identified no evidence of unmarked grave shafts. No additional cultural resources investigations were recommended.

RECOMMENDATIONS

Dovetail's fieldwork and reporting meet the standards for Phase I cultural resource investigation set forth in the County's HPP and the Virginia Department of Historic Resources' 2017 *Guidelines for Conducting Historic Resources Survey in Virginia*. Staff concurs with the consultant's findings and recommendations. As the Etcher Cemetery lies approximately 2,255 feet (0.43 miles) east of the limits of disturbance proposed by the current application, the buffering required by Section 5-1405 of the County's 1993 Revised Zoning Ordinance is not triggered. **No additional cultural resources investigations of this property are recommended prior to approval of this application.**

Staff recommends that the applicant amend Note #21 on the plat in conformity with Facilities Standards Manual Section 8.101.A.21 to include the full titles, company names, and completion dates of the Phase I cultural resources survey completed for the property. Staff recommends the existing text of Note #21 be struck and the following inserted in its place:

A Phase I cultural resources survey report, *Phase IB Cultural Resource Survey of the 119-Acre Academies of Loudoun Project Area, Loudoun County, Virginia*, was prepared for the property by Dovetail Cultural Resource Group in January 2015. The survey identified no archaeological sites, cemeteries, burial grounds, graves, or other significant historic or cultural resources on the property. The Etcher Cemetery (053-6361/PCEM-1998-0048) on adjoining PIN 195-49-0704 is not adjacent to the limits of disturbance and not be impacted.

cc: Heidi Siebentritt, Principal Planner, Community Planning (via e-mail)