



**National Trust for
Historic Preservation**
Save the past. Enrich the future.

February 6, 2019

Mr. Paul D. Holt, III
Director of Planning
James City County
101-A Mounts Bay Road
P.O. Box 8784
Williamsburg, VA 23187-8784

Re: C-18-0123, HRSD Treatment Plant Expansion within Carter's Grove AFD

Dear Mr. Holt:

The National Trust for Historic Preservation has recently become aware of a proposal by the Hampton Roads Sanitation District (HRSD) to condemn a parcel of land around Carter's Grove National Historic Landmark to expand water treatment facilities at the Williamsburg Treatment Plant. The National Trust understands that it is essential for James City County to adequately maintain and upgrade its water treatment infrastructure to service community needs, as well as to comply with water quality laws. However, as James City County considers the HRSD condemnation proposal as a means of satisfying these responsibilities, the National Trust wants to ensure that the historic significance of Carter's Grove is fully understood and that consideration of the proposal's impacts to the historic site is part of the decision-making process.

Carter's Grove is one of the best and most significant remaining examples of Georgian architecture in the United States. It represents the pinnacle of private house building prior to the Revolutionary War and has received the distinction of being designated a National Historic Landmark. National Historic Landmark status is a designation that is reserved for properties that are determined by the U.S. Secretary of the Interior to be "essential to understanding American history" and "of surpassing interest to the American people." There is a compelling public interest in protecting Carter's Grove and its surrounding landscape.

For many historic properties, including Carter's Grove, protecting the landscape context where a resource is located is an important part of maintaining the integrity of the resource. The Carter's Grove manor house was deliberately located to take advantage of the site's natural topography by placing it at the top of a hill with a commanding view of its surrounding lands. The Colonial Williamsburg Foundation, which acquired Carter's Grove in 1970 and was the owner of record when land in Parcel No. 5820100002 was

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originally taken to build the Williamsburg Treatment Plant, understood this context well. As a result, much of the parcel was intentionally retained to remain a part of the historic site and to create a buffer that helps minimize adverse impacts of plant operations on the site. As efforts to address HRSD's expansion plans proceed, finding an approach that continues to maintain a substantial buffer and avoid negative impacts to Carter's Grove should be an important consideration.

The National Trust respectfully requests that James City County carefully review HRSD's condemnation request and consider alternatives or conditions that could effectively serve the water needs of James City County residents, while also minimizing harms to Carter's Grove National Historic Landmark.

Sincerely,

A handwritten signature in blue ink that reads "Paul W. Edmondson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul W. Edmondson
Interim President & CEO