

County Archaeology Comments

Cemetery Preservation Coordinator and County Archaeologist Comments

General

- Please include Statement of Qualifications for all staff
- Scope is generally operating under a lot of assumptions, specifically that archaeological sites and human burials will not be identified. This should be corrected to remove this possible confirmation bias. Historic records indicate there were burials on site (15-20 burials not two), the entire proposal should be formulated with this in mind.

Phase IA

- Background research needs to include historic use of the property, history of the school building and yard, history of the reported burials, civil war activity in the area using first and secondhand accounts.
- Please add The Manassas Museum as a research repository and research of Sanborn maps (which I believe are online).
- GIS Predictive Model should include overlaying of Union and Confederate encampments, field hospitals, hospitals, etc. that are in the vicinity or close by or adjacent the project area, and not just focus on battlefield mapping (no pitched battles occurred in the town of Manassas during the Civil War).
- Under Report Preparation, please include specifically that this section will provide information on and assess the potential for human burials on-site.

Search for Human Burials

- Remove references to PWC ordinance, Section 32-250.110. This is for the preservation of cemeteries, not for the treatment of human remains identified during archaeological investigation
- The proposed excavation 50 cm square test units may not expose enough surface area to identify burial shafts or other possible burial features. One-meter square test units are recommended as well as accounting for COVA guidance which is available here (<https://www.cova-inc.org/committees/cemetery-guidance-now-available/>) and was developed with input from Virginia Department of Historic Resources staff.

- Shovel test pit excavation is not recommended around the northwest corner of the Bennett school. Rather, one-meter square test units are recommended to better control excavation without damaging potential or expected burial features.
- Plan for coordination of methodology and research design with Office of Army Cemeteries
- Please clarify whether Dewberry plans to archaeologically test all remote sensing anomalies or just some. If a sampling strategy is intended, please add the proposed criteria to this scope of work, determining which anomalies will be tested and not tested.
- Please rephrase this sentence “However, given the uncertainty over potential human remains,...” with something like “regarding no surface features, there is a high probability there are human remains based on the historical record.”
- We are extremely troubled by Dewberry’s continued reliance on the 1908 newspaper report of only two burials and not including the 1914 newspaper report of between 15 and 20 burials observed at the Bennet School. This entrenches confirmation bias, potentially culminating in severe public relations liabilities and implementation of methods that do not accomplish the County’s goal, i.e. the identification of all human burials and remains and their legal and ethical treatment. Further, if this scope of work does not contain this information and is subject to a Freedom of Information Act request and this information is not included, it will appear the County is trying to hide the fact that there may be more than two burials located beneath or on the Bennett School property.

Construction Monitoring for Human Remains

- A Bioarcheologist is required to be part of the construction monitoring team, and their qualifications need demonstrate a proven record of identifying fragmentary human remains.
- It is recommended that two archaeologists be employed during construction monitoring. One can be the bioarcheologist and the second an archaeologist with experience identifying burials and fragmentary human remains.
- If a potential human burial or human remains are identified, it is recommended as part of the procedures, a 150-foot buffer will be established where there is to be no ground disturbing activity until investigation is completed, including consultation with VDHR Staff
- Regarding photographs, the general method for PWC and the Office of Army Cemeteries is that no photographs of human remains are taken. However, drawings showing the basic anatomical skeleton and what remains are present and what

trauma is shown and where, such as skeletal coding sheets or visual inventory forms.

Supplemental Scope for Human Remains

- If evidence of human remains is identified. The goal of initial investigation would be to expose possible burial features, not human remains. This could include evidence of a grave shaft, burial cases, coffin hardware, grave stains, but should not be the human remains.

Exhumation of Human Remains

- Scope is to be developed in consultation with VDHR, Army of Office Cemeteries and PWC.

Archaeological Survey

- Since you have GPR data please revisit this methodology to incorporate any anomalies that should be investigated beyond a STP survey.
- Strike this sentence “We assume that the archaeological survey will fail to identify additional archaeological sites in the APE.”
- Regarding collection and curation of artifacts, please provide the following:
 - The collection strategy, including any sampling strategy and the justification for the sampling strategy
 - Proposed artifact temporary storage location
 - A description of artifact analysis that will be conducted

SEE COMMENTS IN PDF FOR MORE RECOMENDATIONS

Historic Resources Specialist Comments

Interior Survey of the Bennett School

- PWC Planning isn’t planning to conduct an interior survey study. Our intent is to have a walk-through of accessible portions of the interior to identify features that should be recorded by the HABS documentation and to identify features that may be salvaged. The Planning Office would do this interior inspection in conjunction with the County Preservationist with the Historic Preservation Office.
- Please rework the wording to say “Planning Department and Office of Historic Preservation representatives will conduct an interior inspection to identify historic

features and will coordinate identified requested HABS photographic view with Dewberry Cultural Resources Staff and Rob Tucher Photography.”

Phase I Architecture Survey:

- Please include the City of Manassas as a stakeholder in determining the visual impact Area of Potential Effect, since the impacted resources likely reside within the city.
- Part A.II.1. Compile Background Information. Noted architect Charles M. Robinson designed the Bennett School. Archival research should include results on the biographical information on Robinson’s career, with a focus on understating where the Bennett School fits into Robinson’s career, as an architect. The University of Virginia houses a collection of the architectural records of Charles M. Robinson. This collection includes photographs and architectural drawings. The consultant needs to consult these records as part of their background research. The information compiled from this research should be included as part of the HABS narrative as well.
- Part A.II.4. Historic Architecture Survey. Survey results should also address impacts to the City of Manassas Historic Overlay District. This is a local historic district that has slightly different boundaries from the NRHP listed Manassas Historic District. Visual impacts to both the Overlay District and the NRHP listed district should be considered. Consultation should also be with both the City of Manassas and Prince William County.
- Part A.II.5. Historic Architecture Survey. The survey report should also include a chapter discussing architecture survey results that includes everything surveyed within the APE that would include NRHP eligible or not eligible properties.

HABS Survey

- Part A.IV. Architectural Documentation. The scope of work needs to note that all HABS documentation will follow NPS HABS Guidelines.
<https://www.nps.gov/subjects/heritagedocumentation/guidelines.htm>
- Part A.IV. Architectural Documentation. Please note in this section that personnel working on the HABS documentation will include personnel that meet Secretary of the Interior Professional Qualification Standards for Architectural History, History, and/or Architecture and Historic Architecture.
- We would prefer the use of the outline report format for the HABS narrative.

- Part A.IV.3 Written Data. The history section of the HABS report should include historical information on the career of Charles M. Robinson and discuss how the Bennett school fits into his career work.

Historic Preservation Architects

- This scope of work mentions historic preservation architects from FPW. However, it is not clear what their activities will be. It would be useful to have the division of labor spelled out more clearly in the SOW. That is identify the responsibility and work tasks undertaken by FPW architects and work tasks and responsibilities undertaken by the Dewberry cultural resources staff.
- Historic architects working on the project should meet Secretary of the Interior Qualification Standards for Historic Architecture and have at least two-years demonstrated experience in working with historic buildings.

Office of Historic Preservation Comments

One concern is the FPW Architects that will be doing the Historic Preservation Documentation. While they have HISP experience, most of the projects they highlight on their website are from the 1990s.

Part A, I- It is the opinion that county staff should not be doing interior survey work. If Dewberry has SOI qualified CRM staff, they should be doing the entire project. This is setting up possible conflict in methodology which could be reflected in the final report. All interior documentation should be done by Dewberry. (Dewberry is already doing LiDAR, pages 5-6, to assist with the measured drawings).

3D modeling of the interior of the building should be in the SOW.

Phase IA, 4- Since the Bennett School is in PWC, staff do not believe it could be a contributing resource to the Manassas Historic District. Looking online the multi-municipal historic designation is unusual and requires additional work. This will likely tee up conflict with the city since they are proposed to be involved in commenting.

V New Building Design:

As part of the Bennett School public history plan, we will assist with the architectural design to identify locations for interpretative elements on the new judicial campus. These interpretive elements may include historic markers, interactive boards, historical summaries, or similar informational panels.

Who is leading this? Please clarify what “we will assist with the architectural design to identify locations for interpretative elements on the new judicial campus.” The SOW should be revised to have Dewberry create the above with review by PWC staff. This may result in another scenario with PWC staff being held responsible for the public history component but not being actively involved in its creation.

IX Bennett School Public History Outline

Dewberry’s cultural resource professionals and Architects will participate in meetings with the project’s identified stakeholders, to include PWC Architectural Review Board, PWC Office of Historic Preservation, Department of Parks and Recreation and the City of Manassas. We assume participation in up to five meetings with stakeholders throughout the duration of the project. The upcoming presentation meetings under the Bennett School Building Memorialization cost proposal are not covered by this scope.

Dewberry will also work with PWC to develop alternative avenues to record and distribute information on the importance of the Bennett School to the Manassas area. These elements would be developed to identify the school’s significant aspects that are of interest to the community and could be provided to the Manassas public schools for inclusion in their educational curriculum.

They should not participate; they should organize and facilitate.

Comments on Cost Proposal Worksheets

PART A Task II - Preparation of Phase IA Cultural Resource Report

- A total of 68 days for research and writing seems high, to research and write the report. What is the division of hours for research and report writing?

PART A Task III - Search for Human Burials

- What services will the architectural historian provide under this task?

PART A Task VI - Archaeological Survey

- This worksheet estimates 830 hours for field excavation, primarily excavation of 398 shovel test pits. What is the division of hours for field work, artifact cataloging and report writing? Are there any assumptions, like the number of artifacts found? What are the expectations if more than the assumed number of artifacts is recovered?
- What services will the architectural historian provide under this task?

PART A TASK VIII - Construction Monitoring for Human Remains

- What is the division of hours for field work and report writing?