



United States Department of the Interior

NATIONAL PARK SERVICE

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H36(2287)

June 12, 2014

Randy Steffey
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**US Army Corps of
Engineers
Norfolk District Regulatory
Office
Received by: RLS
Date: June 12, 2014**

SENT VIA EMAIL. NO HARD COPY TO FOLLOW.

RE: Dominion Surry-Skiffes Creek-Wheaton Project (NAO-2012-00080/13-V0408)

Dear Mr. Steffey,

Thank you for contacting the National Park Service's American Battlefield Protection Program (ABPP) concerning the Section 106 Coordination Process due to a U.S. Army Corps of Engineers Permit application for the above referenced project in Virginia. The ABPP reviewed the materials sent by you on CD-ROM/DVD via mail and received on May 13, 2014 for the project's potential effects on historic resources in the project's area. The project site and Area of Potential Effect (APE) of the proposed transmission line and switching station does fall partially within the boundaries of multiple ABPP recognized battlefields. I will provide comment on the effects of the proposed project on each battlefield and on other military associated sites as noted in the project materials.

Before that, however, I must note two things. First, I believe it would have been beneficial for the ABPP to be involved in the Section 106 consultation process earlier. This area of Virginia saw heavy military occupation and action during the Revolutionary War, War of 1812, and the Civil War, particularly the Peninsula Campaign of 1862. Though many battlefields were identified as historic resources through the Cultural Resource Survey conducted by Stantec, the ABPP would have liked the chance to fully help in identifying military resources and the potential effects earlier on in the process. Given that point and the extensive amount of technical materials and related correspondence that the Army Corps asked each Consulting Party to consider and review, please recognize that these comments may not convey the full extent of concerns and comments. Below is the best attempt at comment at this time. I hope there are further attempts at consultation in the future, with both the Parties identified and the general public.

Second, I want to point out the ABPP's boundaries on our battlefield maps, which I am happy to see you, your consultant Stantec, and Virginia Department of Historic Resources referenced. The data from which

all three boundaries [Core Area, Study Area, and Potential National Register (PotNR) boundary for the Civil War battles] are drawn do not necessarily reflect the full research needed for a formal National Register nomination. The ABPP completed its PotNR assessments for its identified Civil War battlefields in 2011. PotNR boundaries are based on an assessment of aboveground historic features associated with the cultural and natural landscape. The surveys did not include a professional viewshed analysis or archeological inventory or assessment of subsurface features or indications. Therefore, the visual and archeological integrity of many battlefields was unknown at the time the maps/GIS data were prepared. Although useful as a starting point, many assessments are already outdated in 2014. Development continues, as do preservation efforts. It is crucial that battlefield advocates, local governments, state historic preservation offices, and federal agencies reassess the integrity of battlefield landscapes and battle-related archeological features when complying with Section 106 of the National Historic Preservation Act (16 USC 470f).

Revolutionary War Battlefields

Green Springs (VA206)*

Although Green Springs Battlefield is noted on the APE Cultural Resource Inventory Map –Battlefields, this historic resource is not included in the Visual Effects Assessment. Why was this? Is it assumed that the viewshed analysis for this resource is the same as the Governor’s Land Archeological District (DHR 047-0082)? Will the line of sight from this battlefield resource to the Variation 1 location of the transmission lines in the James River be cut off by dense vegetation on Jamestown Island and Hog Island? I request that Green Springs battlefield be fully considered as a resource within the APE. The ABPP has a federal interest in this battlefield, not only because it is listed in the ABPP’s *Report to Congress on the Historic Preservation of Revolutionary War and War of 1812 Sites in the United States*, but also because, in 2009, the ABPP awarded a Battlefield Planning Grant to James City County for mapping and archeological investigations at Green Springs.

Yorktown (VA207)

The ABPP’s Study Area boundary (avenues of approach/retreat) for the Revolutionary War Yorktown Battlefield does overlap the project area’s ROW and APE near the Proposed Skiffes Creek Switching Station. This was not a separate identified historic resource in Stantec’s Cultural Resources Survey Reports. The APE Cultural Resources Inventory Map-Battlefields shows both the Revolutionary War and Civil War Battlefields of Yorktown as one resource. As this area of the project proposes the construction of new structures, further discussions on the potential of archeological resources associated with his battle in the APE and ROW should occur.

Civil War Battlefields

Big Bethel (VA003/DHR 114-5297)

The ABPP concurs with the determination that there is no adverse effect to Big Bethel Battlefield by this project. The battlefield’s Study Area is partially within the APE, but outside of the ROW of the Stage I Skiffes to Whealton Transmission Line and there is no proposed height increase to the lines within the viewshed from the Study Area. Additionally, as per the ABPP’s *Update to the Civil War Sites Advisory*

Commission Report on the Nation's Civil War Battlefields - Commonwealth of Virginia, Big Bethel battlefield has been destroyed by land use incompatible with the preservation of historic features.

Williamsburg (VA010/DHR 099-5282)

It is noted in the material that the Study Area of the Williamsburg Battlefield is located within the ROW and APE of the Skiffes Creek – Whealton 230kV Segment. The PotNR for Williamsburg Battlefield, however, does not extend into the APE. The proposed activities in this area of the project include no height increases to existing structures and/or reconductor of the lines. In other parts of the APE, where the Study Area overlaps, the project proposes to increase the height of the structures. It should be acknowledged that the Study Area for Williamsburg overlaps the Kingsmill Plantation (DHR 047-0010), too, and viewsheds not just from that historic/interpreted plantation house should be considered. What about the viewshed within the battlefield at the bank of the James River?

Yorktown (VA009/DHR 099-5283)

Part of the Civil War Battle of Yorktown is listed on the National Register of Historic Places: Dam No. One Battlefield, listed in 1995. When the effects of the project on Yorktown (VA009) were being assessed, was this listed property considered? I see it is noted in the historical context of the Battle of Yorktown in Santec's A PHASE I CULTURAL RESOURCES SURVEY OF THE PROPOSED APPROXIMATELY 20.2-MILE DOMINION VIRGINIA POWER SKIFFES CREEK TO WHEALTON 230 kV TRANSMISSION LINE, but it is not clear how this part of the battlefield could be affected. It appears that the northwest area of the NR boundary could overlap with the APE on Sheets 6 and 7 of the APE Cultural Resource Inventory Map.

Sites Associated with Military Action

Fort Boykin (DHR046-095)

The ABPP acknowledges that the visual impacts from Fort Boykin may be minimal due to the large distance between the Variation 1 location of the Surry-Skiffes 500kV Segment and the Fort based off of the Visual Effects Assessment. Further discussion is recommended, however, to fully understand the effects on the intended fields of observation and fire at the time of the Fort's use.

Fort Huger (DHR 046-0037)

The ABPP acknowledges that the visual impacts from Fort Huger may be minimal due to the large distance, vegetation, and landforms between the Variation 1 location of the Surry-Skiffes 500kV Segment and the Fort as presented in the Visual Effects Assessment. Further discussion is recommended, however, to fully understand the effects on the intended fields of observation and fire at the time of the Fort's use.

James River

Consideration for the River itself as a resource is considerably lacking. Not only is the River the main resource for the Captain John Smith Chesapeake National Historic Trail, it is also an Associated Property of the Revolutionary War (connection to the use of the Jamestown Ferry) and War of 1812 (fortifications), as noted in the ABPP's *Report to Congress on the Historic Preservation of Revolutionary War and War of 1812 Sites in the United States*. The River itself is a battlefield or military cultural

landscape defining feature. Both the Union and Confederacy Navies relied on the River as avenues of transportation and lines of communication. Due to the importance of the control of the River, both sides during the multiple wars lined its banks with defensive works. Evidence of many of them still remain today.

The ABPP recognize that an underwater archeological assessment was conducted in 2013 by Tidewater Atlantic Research. I cannot fully comment on that assessment at this time, but I do hope that any identified underwater archeological resources relating to the military maritime history of this area, were fully considered. If/when consultation continues, the ABPP would like to comment and discuss this part of the project further.

Mulberry Point Battery/Fort Crafford (DHR 121-0027)

The ABPP recommends that the Army Corps works with Ft. Eustis to gain access on Mulberry Island to assess the potential visual effects of the project on the Mulberry Point Battery and Fort Crafford, both Confederate defensive works occupied in 1861-62. The determination of no adverse effect on a National Register of Historic Places listed property (Fort Crafford) based solely on aerial photography is not acceptable.

Additional Comments/Questions

Overland Construction Access Points throughout the Corridor: Cultural landscapes and defining landscape features of battlefields could be affected by equipment access, including the matting or gravel, especially if, though not in the plans now, any grading does occur. Will the mats and gravel be removed afterwards? The weight and frequency of the equipment over the mats and gravel has the potential of deflating a landscape feature, like an earthwork, or unexpectedly exposing archeological resources. It is recommended that there be archeological monitoring, at the minimum, when accessing and conducting work to replace conductors or heighten the lines and any earthworks associated with the Confederate Army's Warwick Line and Yorktown (VA009), be identified and avoided before and during the project.

Lee's Mill/Wynne's Mill. As noted in Stantec's A PHASE I CULTURAL RESOURCES SURVEY OF THE PROPOSED APPROXIMATELY 20.2-MILE DOMINION VIRGINIA POWER SKIFFES CREEK TO WHEALTON 230 kV TRANSMISSION LINE, "An additional resource, The Lee's Mill Earthworks (121-0050) located in Newport News, is currently mapped in the DSS system incorrectly. The mapped location intersects the current survey corridor; however the resource is actually located just under one mile away from the project area. This resources [sic] was listed on the NRHP in 2003" (p. 73). There is, however, a possibility that this is, rather, the location of Wynne's Mill, a Confederate command post and defensive position during Yorktown (VA009). It is recommended that further research and cultural resource survey is conducted in this area of the ROW (Structures 285/448 and 285/449).

If you have any further questions about these battlefields or the comments provided, please contact me at 202-354-2215 or Elizabeth_Vehmeyer@nps.gov.

Sincerely,



Elizabeth Vehmeyer

Grants Management Specialist

American Battlefield Protection Program

cc: Roger Kirchen, Virginia Department of Historic Resources
Reid Nelson, Advisory Council on Historic Preservation
All Consulting Parties

* (VA###) refers to the ABPP's *Report to Congress on the Historic Preservation of Revolutionary War and War of 1812 Sites in the United States* or the Civil War Sites Advisory Commission (CWSAC) assigned battlefield resource ID.