



United States Department of the Interior

NATIONAL PARK SERVICE
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Norfolk District
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Randy Steffey
Environmental Scientist/Project Manager
USACE, Norfolk District
803 Front Street
Norfolk, VA 23510-1096

SENT VIA EMAIL. NO HARD COPY TO FOLLOW.

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

Dear Mr. Steffey,

The National Park Service's American Battlefield Protection Program (ABPP) is providing written comments as follow-up to the discussions had pertaining to the items covered on the agenda at the December 9, 2014 Consulting Parties Meeting in Williamsburg, VA for the above referenced project. Comments in this letter relate to historic property eligibility and potential effects that would result from Dominion's preferred alternative route for the proposed Transmission Line across the James River (Surry to Skiffes Creek).

In the ABPP's June 2014 letter providing initial comment on this project, the ABPP recommended that the Army Corps gain access to Ft. Eustis on Mulberry Island to assess the potential visual effects on Mulberry Island Point Battery and Fort Crafford, two Confederate defensive works occupied in 1861-62. Mulberry Island Point Battery acted as the western most fortification on the Confederate's Warwick Line; protecting the Island and Peninsula from a Union naval attack along the James River. This battery only offered protection from a naval attack, so in September of 1861, Confederates constructed Fort Crafford, a pentagon-shaped defense position.¹ Fort Crafford was abandoned in May 1862. The Fort and Mulberry Island fall within the ABPP's Study Area of the Civil War Yorktown Battlefield (VA009/DHR 099-5283).² At the September 2014 Consulting Parties meeting, Dominion's consultant Stantec noted that they were working with Fort Eustis to gain access. In Stantec's October 29, 2014 Addendum to the Visual Effects Assessment, Fort Crafford (VDHR #121-0017) was evaluated. Thank you to Stantec for following up with this request.

¹ Senior Airman Jason J. Brown. "The anchor on the line: The history of Fort Crafford, Fort Eustis' Civil War relic." August 20, 2012. <http://www.jble.af.mil/news/story.asp?id=123314753>. Accessed January 14, 2015.

² (VA####) refers to the Civil War Sites Advisory Commission (CWSAC) assigned battlefield resource ID.

I would like to point out, however, the National Register eligibility status listed for Fort Crafford in the said Addendum. Stantec recommends it eligible for listing on the National Register of Historic Places (NRHP) under Criterion A and potentially eligible under Criterion D. Fort Crafford was listed on May 17, 1974 (NR# 74002237). Please update this information for this identified historic property and its NRHP eligibility status.

In addition to discussing historic property eligibility at the December 9 meeting, you asked Consulting Parties for advice on assessing potential effects from Dominion's preferred alternative route on historic properties. In the case of Mulberry Point Battery and Fort Crafford, the ABPP recommends taking a military terrain analysis approach, a process developed by the US military for analyzing the significance of terrain. By studying the military significance of the terrain, a surveyor can identify the military or battlefield terrain on the modern landscape and view it through the soldiers' eyes. Military terrain is analyzed using five aspects: Observation and Fields of Fire, Avenues of Approach/Withdrawal, Key Terrain/Decisive Terrain, Obstacles, Concealment and Cover. "The terrain has a direct impact on selecting objectives; location, movement, and control of forces; effectiveness of weapons and other systems; and protective measures."³

The location of Fort Crafford "offered Confederate troops advantageous firing positions overlooking the James River and inland."⁴ The line of sight from the Fort to and along the James River was crucial for these troops and the strategy of the Confederates on the Peninsula at this time. Using this type of approach can help the USACE/Stanec understand why the property is there on the landscape, what function it served, what features add to its listing in the National Register, if the property still conveys its significance and integrity, how the introduction of the transmission line could change the understanding of the Confederates' observation and fields of fire from the Fort to the James River.

At this time, the ABPP cannot concur with Stantec's recommendation that the proposed project will not have an adverse visual effect on Fort Crafford. Stantec lists tree cover, distance to the proposed transmission line (3.38 miles), and atmospheric refraction for this recommendation; however, its visual assessment noted that the line will be visible from the Fort as evidenced from at least one photograph in the visual assessment and from view shed modeling and lines-of-sight. In the case of Fort Crafford, the fact that the transmission lines will be seen clearly and, most likely, through the existing tree cover in the late fall/winter, the ABPP does not believe Stantec can recommend no adverse visual effect since the transmission line will only be seen from certain vantage points. The difference here is that this historic property gains part of its significance and retains parts of its integrity due to those vantage points and lines-of sight. On a related note, have there been any conversations with Joint Base Langley-Eustis about this historic property and the potential effects of this transmission line? The Base's Cultural Resource staff may be able to add to this discussion of visual integrity and fortifications.

³ US Army Field Manual No. 6-0.

⁴Senior Airman Jason J. Brown. "The anchor on the line: The history of Fort Crafford, Fort Eustis' Civil War relic." August 20, 2012. <http://www.jble.af.mil/news/story.asp?id=123314753>. Accessed January 14, 2015.

Lastly, the ABPP would like to continue to stress the consideration of the James River itself as a resource and historic property. The river is 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*. It 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 remains today.

If you have any further questions about military terrain analysis and how the ABPP uses it or the comments provided, please contact me at 202-354-2215 or Elizabeth_Vehmeyer@nps.gov.

Sincerely,

A handwritten signature in black ink that reads "Elizabeth Vehmeyer". The script is cursive and fluid, with the first name and last name clearly legible.

Elizabeth Vehmeyer
Grants Management Specialist
American Battlefield Protection Program

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