



IN REPLY REFER TO:

## United States Department of the Interior

NATIONAL PARK SERVICE  
Northeast Region  
United States Custom House  
200 Chestnut Street  
Philadelphia, PA 19106

A.1.2.(NER-RS&S)

**JUN 17 2015**

**US Army Corps of  
Engineers  
Norfolk District  
Regulatory Office  
Received by: RLS  
Date: June 19, 2015**

Ms. Lynette R. Rhodes  
Mr. Randy Steffey  
US Army Corps of Engineers, Norfolk District  
803 Front Street  
Norfolk, VA 23510-1096  
ATTN: CENAO-WR-R

Re: Dominion Surry-Skiffes Creek-Wheaton Transmission Line Consultation CENAO-WRR  
NAO-2012-00080; 13-V0408 and Southern Virginia Regulatory Section NAO-2012-00080; 13-  
V0408 (James River)

Dear Ms. Rhodes and Mr. Steffey:

This letter is in response to: (1) the USACE Federal Public Notice (Public Notice) dated May 21, 2015, requesting public and Consulting Party comments to assist in evaluation of effects on historic properties and evaluation of alternatives or modifications which could avoid, minimize or mitigate adverse effects and (2) the USACE letter to the Director of the National Park Service (Letter to the Director) dated May 29, 2015, requesting comments on effects specific to Carter's Grove Plantation National Historic Landmark (NHL).

As we have previously stated, the National Park Service has determined that the proposed federal undertaking will have adverse effects on NPS units and areas of NPS interest. These include:

- Colonial National Historical Park for both the Colonial Parkway and Historic Jamestowne
- Captain John Smith Chesapeake National Historic Trail (NHT)<sup>1</sup>
- Washington Rochambeau Revolutionary Route National Historic Trail
- Carter's Grove Plantation National Historic Landmark

The NPS also finds the undertaking will have adverse effects on a proposed National Register eligible cultural landscape (or district) identified in a May 7, 2015, USACE report. A full assessment of effects of the proposed federal undertaking on each of the NPS units and areas of NPS interest above must be undertaken under both Section 106 of the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA).

<sup>1</sup> In a separate letter dated June 9, 2015 the NPS provided comments regarding the National Register eligibility of the Captain John Smith Chesapeake NHT. We treat the trail segment within this project's Area of Potential Effect (APE) as National Register eligible for the purposes of this letter on assessment of effects.

The primary concerns of the NPS are for: (1) the visual effects of the project on the scenic, cultural and recreational resources and values of each of the NPS units and areas of NPS interest; and (2) the effects on visitor experiences at each of the units; (3) effects of the project on natural resources associated with American Indian landscape values, in particular Atlantic Sturgeon; and (4) cumulative effects of the project.

### **Visual Effects Analysis**

The proposed project will be visible from each of the areas of NPS interest. A major unscreenable modern development such as is proposed would significantly contrast with the setting, feeling, historic landscape and natural landscape features associated with each of these historic properties. The result would be highly diminished historic integrity to each of these resources.

Both the Section 106 analysis and an Environmental Impact Statement (EIS) prepared under the NEPA should include visual effect assessments on these properties and resources for all considered project alternatives. The assessments should include multiple viewpoint perspectives from each of the properties and resources, including on-water vantage points that would illustrate impacts from the NHTs and river components of the historic landscape. The NPS would be happy to provide recommendations of potential locations for rendering visual assessment perspectives.

Prior visual assessments prepared by Stantec have been incomplete. The assessments should include state of the art photo/video simulations presenting accurate models of the views of all proposed new development from each viewpoint. For on-water vantage points this should include continuous views from both the upstream and downstream approaches to the transmission towers to actually crossing under the towers, simulating the experience of waterborne visitors.

In addition, the full extent (area) of visibility of the proposed project should be calculated in a manner similar to the methodology described for the map at the October consulting parties meeting. This should also indicate, calculate and describe the effects on each historic property and its contributing components.

### **Effects on Visitor Experience**

Visitor experience of historic, scenic and recreational values is a central purpose of the national historical park and two national trails. Similarly, the national historic landmark is recognized for its value in illustrating or interpreting the heritage of the United States.

If implemented, the proposed project would alter the visitor experience at each of the units of NPS in concern. The assessment of effects should evaluate the potential negative impacts the proposed project could have on the visitor experiences associated with each of the units of concern. These types of analyses and impacts are typically defined in the EIS that helps determine the preferred alternative. Among other things, these analyses should evaluate impacts on current and projected future visitation and recreational use associated with the units of concern, both quantitatively and qualitatively. For example, a 2010 report found that 3.46 million recreational visitors drive Colonial Parkway. The project will have an effect on these visitors' experiences.

One approach for evaluating such impacts is through benefit transfer analysis, relying on visitation data, estimates of the value of recreational and cultural/historical activities, and information on the likely reduction in value associated with the proposed project. This should address annual losses over time. There are precedents for using this type of analysis in similar EIS assessments.

### **Effects on Natural Resources**

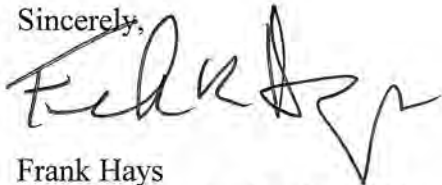
While natural resources are typically addressed through NEPA analyses, some natural resources have cultural values as part of a recognized cultural landscape. In particular, American Indian nations and tribes often ascribe significant value to particular species and the habitat supporting them. This may be the case with Atlantic Sturgeon (*Acipenser oxyrinchus*), a threatened species observed in the Area of Potential Effect (APE) and in the immediate vicinity of the proposed in-water tower locations. American Indian resources and indigenous cultural landscape features in the area are associated with the Captain John Smith Chesapeake NHT; this may include the Atlantic Sturgeon. Potential effects on Atlantic Sturgeon must be assessed through NEPA but should also be considered and evaluated through Section 106 consultation.

### **Cumulative Effects**

Cumulative effects are those that result from the successive, incremental, and/or combined effects of the project when added to other existing, planned and/or reasonably anticipated future development. A cumulative effect assessment is required, pursuant to NEPA and the NHPA, to better understand these potential effects. It is important to ensure the cumulative effect assessment addresses each of the categories outlined above (visual effects, visitor experience and natural resources) in relation to each of the units of NPS interest.

We look forward to working with you in addressing the concerns outlined above and are eager to meet with you to do so.

Sincerely,



Frank Hays  
Acting, Associate Regional Director, Resource Stewardship

cc:

Col. Paul Olsen, Commander, Norfolk District, US Army Corps of Engineers  
Reid Nelson, Dir., Office of Federal Agency Prgms, Advisory Council on Historic Preservation  
Charlene Dwin Vaughn, Assistant Director, Advisory Council on Historic Preservation  
John Eddins, Program Analyst, Advisory Council on Historic Preservation  
Julie Langan, SHPO, Virginia Department of Historic Resources  
Roger Kirchen, Director of Division of Review and Compliance, VA Dept. of Historic Resources  
Jeff Durbin, Sect. 106 Compliance Officer, National Park Service  
Paul Loether, Chief, National Register of Historic Places and National Historic Landmarks, NPS