



# United States Department of the Interior

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

IN REPLY REFER TO:

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**JUL 09 2015**

**US Army Corps of  
Engineers  
Norfolk District  
Regulatory Office  
Received by: RLS  
Date: July 10, 2015**

Ms. Lynette R. Rhodes  
Mr. Randy Steffey  
Norfolk District, US Army Corps of Engineers  
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 the United States Army Corp of Engineers (USACE) Section 106 consulting party meeting in Williamsburg on June 24, 2015. The National Park Service (NPS) thanks you for hosting the consulting party meeting. While we understand your concerns that progress was not made determining appropriate mitigation strategies, we hope that the USACE understands the project as proposed will have significant adverse effects to historic resources that are of the utmost importance and integral to the development of the United States.

The NPS agrees with the other consulting parties that additional tasks need to be completed before any discussion of mitigation is appropriate. Based on recent correspondence and the conversations within the consulting party meeting we offer the following recommendations for moving forward:

- 1) Complete the historic property identification phase. Specifically, the Determination of Eligibility (DOE) for the portion of the Captain John Smith Chesapeake NHT within the APE needs to be completed before assessment of effects can be addressed and before any discussions regarding mitigation can be initiated.
- 2) Visual assessments and simulations from specific and key vantage points for each historic property within the APE must be provided, prior to completing the assessment of effects. The assessments and simulations should include multiple viewpoint perspectives from each of the historic properties and resources, including on-water vantage points that would illustrate impacts from the NHTs and river components of the historic landscape. As we stated in the meeting, the NPS is willing to assist USACE to identify key locations for analysis and completion of the visual simulations. As an initial step, NPS is preparing GIS data layers representing all identified historic properties and key vantage points associated with those properties. We look forward to providing this information to you within the next few weeks. Please refer to our June 15, 2015, letter to USACE for additional information on visual assessments.

- 3) Complete the assessment of effects on historic properties. As discussed, additional details for the adverse effect on each historic property is necessary. Broadly stating the project will have an "adverse effect" on historic properties is insufficient to understand the nature and extent of those effects. Specific findings on the type of effect and how severe each effect is will be needed prior to the determination of the least impactful alternative and any discussion of mitigation. To assist with this, the NPS anticipates submitting additional comments regarding the effects of each alternative on historic properties.
- 4) Complete analysis of cumulative effects 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.

The NPS remains available to work with the USACE and other consulting parties to finalize the required steps of the Section 106 process. We look forward to a future consulting party meeting where we can confirm the identification of historic properties and assessments of effect, and have fully informed discussions regarding alternatives, their varying levels of impact, and any mitigation needs associated with them.

Sincerely,



Carmen Chapin  
Acting Associate Regional Director  
Resource Stewardship and Science

cc:

Mike Caldwell, Regional Director, National Park Service, Northeast Region  
Col. Paul Olsen, Commander, Norfolk District, US Army Corps of Engineers  
Reid Nelson, Director, Office of Federal Agency Programs, Advisory Council on Historic Preservation  
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