



United States Department of the Interior

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

**US Army Corps of
Engineers
Norfolk District
Regulatory Office
Received by: RLS
Date: July 24, 2015**

July 24, 2015

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

Re: Dominion Surry-Skiffes Creek-Whealton 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 conversations held during the June 24, 2015 consulting parties meeting and your request for additional comments regarding the impacts to historic properties associated with the proposed Surry-Skiffes Creek-Whealton Transmission Line and alternatives.

The National Park Service (NPS) builds on our multiple prior comments and provides additional information on impacts to historic properties, organized below by alternative. The alternatives addressed include those identified in the document "Surry-Skiffes Creek-Whealton 500 kV/230kV Alternatives Analysis" prepared by Dominion Virginia Power and date stamped January 8, 2015 by the USACE.

We note the comments below only address impacts on historic properties associated with National Park Service units or designations. Given the magnitude of the project and the significant impacts on historic properties and other resources of concern, the National Park Service believes an Environmental Impact Statement (EIS) needs to be prepared. The NPS expects to provide additional comments in the process of preparing such an EIS.

1. No Action Alternative

This alternative is described by Dominion as follows: under the no action alternative, Yorktown Units 1 and 2 would be retired to comply with the Environmental Protection Agency's (EPA) Mercury and Toxic Standards (MATS) rule; Dominion states this is due to the units' age and the costs of maintaining compliance with regulations. We recognize the recent ruling in *Michigan, et al., v. Environmental Protection Agency, et al. No. 14-46* and inquire how that will impact the no action and other alternatives.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

As there would be no new physical development within the vicinity of the national historical park, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

As there would be no new physical development within the national historic trail corridor we do not anticipate any likely impacts to this historic property from this alternative.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

As there would be no new physical development within the national historic trail corridor we do not anticipate any likely impacts to this historic property from this alternative.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

As there would be no new physical development within the segment of the James River listed for its outstandingly remarkable historic values we do not anticipate any likely impacts to this historic property from this alternative.

2. Retrofitting Yorktown Units 1, 2 and/or 3

This alternative is described as retrofitting either Yorktown units 1 and 2 or unit 3 to comply with the EPA MATS rule.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

As there would be no new physical development (outside of potential *temporary* construction activity) within the vicinity of the national historical park, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

As there would be no new physical development (outside of potential *temporary* construction activity) within the national historic trail corridor we do not anticipate any likely impacts to this historic property from this alternative.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

As there would be no new physical development (outside of potential *temporary* construction activity) within the national historic trail corridor we do not anticipate any likely impacts to this historic property from this alternative.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

As there would be no new physical development within the segment of the James River listed for its outstandingly remarkable historic values we do not anticipate any likely impacts to the historic property from this alternative.

3. Repowering Yorktown

This alternative is described as repowering some or all of the Yorktown units to natural gas.

Impacts to Historic Properties

Impacts to Colonial National Historical Park, Captain John Smith Chesapeake NHT & Washington-Rochambeau Revolutionary Route NHT:

The anticipated potential impacts to these properties from repowering some or all of the Yorktown units to natural gas would be most likely to occur from physical development for supplying gas to the units. This could result from: land acquisition within close proximity to the property for industrial use, location of the proposed pipeline route, construction activity and right-of-way maintenance for any new pipeline and/or transmission lines that would be required to meet this alternative. However, as no specific routing or development plans are available it is not feasible to assess specific impacts to these historic properties.

There could be additional concerns associated with the potential for vented gas, excessive noise and/or light pollution from any required pump or booster stations associated with the pipeline. Environmental concerns include hazards related to the leaking, spilling or unintended discharge of the raw materials being transported through the pipeline and the additional pipeline infrastructure that may be required in the region to fulfill the supply requirements of the applicant. Again, however, there is no specific information available for assessing these types of impacts on these historic properties.

Carter's Grove Plantation National Historic Landmark Impacts:

Despite the uncertainty regarding potential natural gas supply routing, it would appear unlikely that any new physical development would occur within the vicinity of Carter's Grove, or within its viewshed; thus, we do not anticipate any likely impacts to this historic property from this alternative.

4. Combination Generation Alternatives

These alternatives are described as various combinations of retrofitting, repowering and retirement of the Yorktown units combined with transmission construction.

Impacts to Historic Properties

The potential impacts of this alternative on historic properties would likely be similar to those of a combination of alternatives 2 and 3 above. However, as no specific routing or development plans are available it is not feasible to assess specific impacts to historic properties.

5. New Generation

This alternative would use some combination of approaches for new generation (combined-cycle, combustion turbine, new coal generation units, biomass, wind, solar) to replace the Yorktown units' capacity.

Impacts to Historic Properties

Without understanding the specific options, locations, routes or physical development associated with the New Generation Alternative it is not possible to articulate the potential impacts to the historic properties of concern.

6. Alternative Corridors

Dominion identified 18 potential corridor routes of upgraded transmission lines (either 230 kV or 500 kV) to satisfy the EPA MATS rule and be in compliance with the NERC reliability criteria. Six alternatives were compared in greater detail: Line 214/263 230 kV Line Rebuild (James River Bridge Crossing); Chuckatuck - Newport News 230 kV Line (Whittier Hybrid); Surry - Whealton 500 kV Line; Chickahominy - Lanexa 500 kV Line; Chickahominy - Skiffes Creek 500 kV Line; and Chickahominy - Skiffes Creek 230 kV Double Circuit Line. Impacts associated with these alternatives are described below.

6a. Line 214/263 230 kV Line Rebuild (James River Bridge Crossing)

This alternative would involve rebuilding the existing 230 kV located adjacent to the James River Bridge to a higher capacity.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

As there would be no new physical development within the vicinity of the national historical park, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

This alternative would involve some degree of physical upgrades to an existing transmission line crossing the James River and the trail within the trail corridor. However, this would occur in direct association with an existing line adjacent to an existing highway bridge crossing the river in a largely developed setting. An upgrade of the existing line would cause negligible additional impacts to trail resources. Moreover, concentrating all river crossings within the same existing corridor in a heavily urban-developed section of the river is an excellent example of avoiding or minimizing physical, environmental, visitor and visual impacts while achieving project objectives.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

The statement above relative to the Captain John Smith Chesapeake NHT applies equally to this trail.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

The statements above relative to the Colonial NHP, Carter's Grove, and the Captain John Smith Chesapeake NHT apply to this segment of the James River listed for its outstandingly remarkable historic values.

6b. Chuckatuck - Newport News 230 kV Line (Whittier Hybrid)

This alternative would involve the construction of a new 15.4 mile long transmission line along new or expanded ROW between the Chuckatuck and Whealton Substations. Construction of a new crossing of the James River in the vicinity of the existing James River crossing would be required, as would expansion of existing ROW in residential areas and construction of new lines through several miles of wetlands between Chuckatuck and the James River.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

As there would be no new physical development within the vicinity of the national historical park, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

This alternative would involve some degree of physical upgrades to an existing transmission line crossing the James River and the trail within the trail corridor. However, this would occur in direct association with an existing line adjacent to an existing highway bridge crossing the river in a largely developed setting. An upgrade of the existing line would cause negligible additional impacts to trail resources. Moreover, concentrating all river crossings within the same existing corridor in a heavily urban-developed section of the river is an excellent example of avoiding or minimizing physical, environmental, visitor and visual impacts while achieving project objectives.

Depending on the specific route from Chuckatuck to the James River, however, this alternative could potentially have negative impacts to trail resources due to project requirements including acquisition of new ROW south of the James River, wetland crossings and the potential for future projects to support the alternative.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

Due to co-location of the crossing with the existing James River Bridge area, this alternative is likely to avoid or minimize any impacts to the trail and trail resources.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

Due to co-location of the crossing with the existing James River Bridge area, this alternative is likely to avoid or minimize any impacts to the outstandingly remarkable historic values for which this segment of the James River is listed.

6c. Surry - Whealton 500 kV Line

This alternative would involve building a new 500 kV transmission line adjacent to the existing 230 kV line, which is located adjacent to the James River Bridge.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

As there would be no new physical development within the vicinity of the national historical park, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

This alternative would involve some degree of physical upgrades to an existing transmission line crossing the James River and the trail within the trail corridor. However, this would occur in direct association with an existing line adjacent to an existing highway bridge crossing the river in a largely developed setting. While this alternative would require acquisition of new ROW, wetland crossings and expansion of

existing switching stations, the alternative appears to locate the required upgrades in areas that are presently functioning to support electrical transmission. While the final route is unknown at the time of this analysis, there is a high probability that this alternative would either avoid or greatly minimize adverse effects to the trail and its resources.

Moreover, concentrating all river crossings within the same existing corridor in a heavily urban-developed section of the river is an excellent example of avoiding or minimizing physical, environmental, visitor and visual impacts while achieving project objectives.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

The statement above relative to the Captain John Smith Chesapeake NHT applies equally to this trail.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

The statements above relative to the Colonial NHP, Carter's Grove, and the Captain John Smith Chesapeake NHT apply to this segment of the James River listed for its outstandingly remarkable historic values.

6d. Chickahominy - Lanexa 500 kV Line

This alternative would involve building a new 14.3 mile section of 500 kV transmission line within an existing transmission corridor that currently has transmission lines.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

As there would be no new physical development within the vicinity of the national historical park, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

This alternative would involve some degree of physical upgrades to an existing transmission line crossing the Chickahominy River and the trail within the trail corridor. It is not possible to fully assess the potential impacts to trail resources without knowing specific details, such as the proposed height of the new 500 kV transmission towers that would be located within the existing transmission corridor. In general however, concentrating upgraded transmission within an existing corridor is an excellent example of avoiding or minimizing physical, environmental, visitor and visual impacts while achieving project objectives.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

As there would be no new physical development within the national historic trail corridor we do not anticipate any likely impacts to this historic property from this alternative.

Nationwide Rivers Inventory (NRI) Listings:

James River, Mogarts Beach to Hopewell:

As there would be no new physical development within this segment of the James River listed for its outstandingly remarkable historic values we do not anticipate any likely impacts to this historic property from this alternative.

Chickahominy River, James River to Providence Forge:

We note that this section of the Chickahominy river is listed on the NRI for outstandingly remarkable geological and botanic values. This alternative would require further evaluation to determine the potential impacts to these values.

6e. Chickahominy - Skiffes Creek 500 kV Line and 230 kV Double Circuit Line

This alternative would involve building a new 37.9 miles of 500 kV transmission line, 24.9 miles of which would be within a currently unimproved (i.e. vegetated, not maintained, would need to be cleared) ROW that Dominion owns. Two potential options for this route were considered: (1) 500 kV line; (2) 230 kV Double circuit line.

Dominion stated this alternative would have significant environmental and cultural resource impacts associated with this route by crossing 93.32 acres of nontidal wetlands, 8.64 acres of tidal wetlands and would require the clearing and permanent conversion of 62 acres of palustrine forested wetlands. At least one transmission tower would need to be constructed within the Chickahominy River, as well as the likely placement of additional towers within adjacent tidal wetlands.

Impacts to Historic Properties

Colonial National Historical Park Impacts:

This alternative would involve a segment visible from the Colonial Parkway, but it would be located along an existing ROW that currently has a transmission line running through it. Overall, effects to the Colonial Parkway from this alternative would be limited. Other segments of the proposed corridor are outside the vicinity of the national historical park and its viewshed.

Carter's Grove Plantation National Historic Landmark Impacts:

As there would be no new physical development within the vicinity of Carter's Grove, or within its viewshed, we do not anticipate any likely impacts to this historic property from this alternative.

Captain John Smith Chesapeake National Historic Trail Impacts:

The new transmission corridor entailed by this alternative would cross the trail and the Chickahominy River in an area that is largely undeveloped. Such a new corridor would require substantial clearing of vegetation along currently unimproved ROW, and tidal and nontidal wetlands crossings, as well as construction of new transmission towers. This section of the trail along the Chickahominy includes multiple trail resources, including extensive landscape areas identified as evocative of the 17th century, high potential for indigenous cultural landscapes, and numerous American Indian town sites and archaeological sites. Because of the multitude of resources in this trail segment, much of the Chickahominy landscape is likely to represent a National Register eligible historic district. This area is also identified as a focus area for visitor experiences along the trail due to its high concentration of resources.

A new transmission corridor crossing the river and the trail would be effectively unscreenable. There would be no possibility of eliminating visual impacts to the main trail route and likely multiple areas of trail resources. This alternative would have significant adverse to the trail and trail resources.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

As there would be no new physical development within the national historic trail corridor we do not anticipate any likely impacts to this historic property from this alternative.

Nationwide Rivers Inventory (NRI) Listings:

James River, Mogarts Beach to Hopewell:

As there would be no new physical development within this segment of the James River listed for its outstandingly remarkable historic values we do not anticipate any likely impacts to this historic property from this alternative.

Chickahominy River, James River to Providence Forge:

We note that this section of the Chickahominy river is listed on the NRI for outstandingly remarkable geological and botanic values. This alternative would require further evaluation to determine the potential impacts to these values.

6f. Surry - Skiffes Creek Underground 230 kV Line

This alternative would construct a 230 kV electrical transmission underneath the James River. Two options are considered: (1) a single 230 kV line; (2) a double circuit 230 kV line.

Impacts to Historic Properties

Captain John Smith Chesapeake National Historic Trail Impacts:

It is not possible to fully assess the potential impacts to the trail and trail resources without specific design and construction details, such as the proposed depth of the proposed underground transmission crossing, maintenance protocols and the heights/locations of any on-shore support equipment required. However, locating transmission line corridors underneath the James River represents an avoidance or minimization of impacts to many trail resources (evocative landscapes, historic sites, indigenous cultural landscapes, etc.) as well to visitor experiences. Techniques presently being utilized in horizontal directional drilling (HDD) would likely be able to facilitate construction of underground transmission options with little to no disturbance of the river bottom, thereby avoiding or minimizing impacts to the underwater archaeology as well as the oyster leased areas.

Given the above, both options of this alternative would likely have minimal to no impacts on the trail and trail resources; additional design and construction details would be required for a complete assessment.

Colonial National Historical Park Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Carter's Grove Plantation National Historic Landmark Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

The statements above relative to the Colonial NHP, Carter's Grove, and the Captain John Smith Chesapeake NHT apply to this segment of the James River listed for its outstandingly remarkable historic values.

6g. Surry - Skiffes Creek 500 kV Underground (AC)

This alternative would construct a 500 kV electrical transmission underneath the James River.

Impacts to Historic Properties

Captain John Smith Chesapeake National Historic Trail Impacts:

It is not possible to fully assess the potential impacts to the trail and trail resources without specific design and construction details, such as the proposed depth of the proposed underground transmission crossing, maintenance protocols and the heights/locations of any on-shore support equipment required. However, locating transmission line corridors underneath the James River represents an avoidance or minimization of impacts to many trail resources (evocative landscapes, historic sites, indigenous cultural landscapes, etc.) as well to visitor experiences. Techniques presently being utilized in horizontal directional drilling (HDD) would likely be able to facilitate construction of underground transmission options with little to no disturbance of the river bottom, thereby avoiding or minimizing impacts to the underwater archaeology as well as the oyster leased areas.

Given the above, both options of this alternative would likely have minimal to no impacts on the trail and trail resources; additional design and construction details would be required for a complete assessment.

Colonial National Historical Park Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Carter's Grove Plantation National Historic Landmark Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

The statements above relative to the Colonial NHP, Carter's Grove, and the Captain John Smith Chesapeake NHT apply to this segment of the James River listed for its outstandingly remarkable historic values.

6h. Surry - Skiffes Creek 500 kV Underground (HVDC)

This alternative would construct a high voltage direct current (HVDC) crossing underneath the James River.

Impacts to Historic Properties

Captain John Smith Chesapeake National Historic Trail Impacts:

It is not possible to fully assess the potential impacts to the trail and trail resources without specific design and construction details, such as the proposed depth of the proposed underground transmission crossing, maintenance protocols and the heights/locations of any on-shore support equipment required. However, locating transmission line corridors underneath the James River represents an avoidance or minimization of impacts to many trail resources (evocative landscapes, historic sites, indigenous cultural landscapes, etc.) as well to visitor experiences. Techniques presently being utilized in horizontal directional drilling

(HDD) would likely be able to facilitate construction of underground transmission options with little to no disturbance of the river bottom, thereby avoiding or minimizing impacts to the underwater archaeology as well as the oyster leased areas.

Given the above, both options of this alternative would likely have minimal to no impacts on the trail and trail resources; additional design and construction details would be required for a complete assessment.

Colonial National Historical Park Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Carter's Grove Plantation National Historic Landmark Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

With the same caveats noted above for the Captain John Smith Chesapeake NHT--and the noted advantages of avoidance and minimization from an underground route--both options of this alternative would be likely to have minimal to no impacts to this historic property.

Nationwide Rivers Inventory (NRI) Listing -- James River, Mogarts Beach to Hopewell:

The statements above relative to the Colonial NHP, Carter's Grove, and the Captain John Smith Chesapeake NHT apply to this segment of the James River listed for its outstandingly remarkable historic values.

7. Dominion's Preferred Alternative: Surry - Skiffes Creek - Whealton 500 kV/230 kV Line

This alternative proposes to construct a new 7.76 mile 500 kV aerial transmission line from Surry Nuclear Power Plant to a proposed Skiffes Creek switching station, followed by the construction of 20.2 miles of 230 kV overhead transmission line within an existing aerial power line easement from the proposed switching station to the Whealton substation. The proposed overhead 500 kV powerline from Surry Nuclear Power Plant to Skiffes Creek would make an approximately 4.1 mile crossing of the James River, requiring the placement of 17 towers up to 295' tall as well as related infrastructure within the James River.

Impacts to Historic Properties

There are more extensive details available for assessing the impacts of this alternative. As we have previously stated, the National Park Service has determined that this alternative would have significant adverse effects on multiple historic properties, NPS units and areas of NPS interest. As communicated in our letter of July 9, the NPS is preparing additional information to assist the USACE in assessing the scope and magnitude of these impacts; this will be forthcoming. In the interim, we reiterate the following summary of anticipated impacts.

Colonial National Historical Park Impacts:

The proposed transmission line and towers would be directly visible from 17 locations within Colonial NHP, including Black Point on Jamestown Island, the Jamestown Island Loop Road, Swanns Point, several stretches of the Colonial Parkway, and visitor pull-offs and viewing areas on the Parkway. The line and towers would introduce a major new industrial use directly visible to park visitors and contrasting with the current historic setting, feeling and landscape of the park.

Carter's Grove Plantation National Historic Landmark Impacts:

The proposed transmission line and towers would be directly visible from multiple locations at Carter's Grove, one of the most significant colonial plantations in the United States. The site was originally designed in the 1750s to orient to scenic views of the natural landscape of the James River. The line and towers would introduce a major new industrial use directly visible from the plantation mansion and other key vantage points of the historic property. This would directly contrast with the current historic setting, feeling, and landscape of the national historic landmark.

Captain John Smith Chesapeake National Historic Trail Impacts:

The proposed transmission line and towers would directly cross the national historic trail and be directly visible from multiple vantage points associated with trail resources and visitor use areas. These include but are not limited to: the main water route approach to Jamestown coming up the James River followed by Captain John Smith and his crew; high-potential indigenous cultural landscapes in the vicinity of Hog Island Wildlife Management Area, Jamestown Island/Back River and other locations; two focus areas identified for visitor use and experiences along the James (Chippokes Plantation State Park & Hog Island Wildlife Management Area; Jamestown and Powhatan Creek); voyage stops at Jamestown Island; and other locations, including much of a likely National Register eligible historic district. For a number of these resources, the transmission line and towers would be in the immediate foreground of view. The line and towers would introduce a major new industrial use in the context of a landscape which has been identified as retaining an appearance evocative of the 17th century. Further, a new transmission corridor crossing the river and the trail would be effectively unscreenable. There would be no possibility of eliminating visual impacts to the main trail route and multiple areas of trail resources. Such a major unscreenable industrial use would significantly contrast with the setting, feeling, historic landscape and natural landscape features associated with this historic property. The result would be highly diminished historic integrity.

In addition, certain 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 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. This alternative may have the potential to have adverse effects on Atlantic Sturgeon; this should be assessed not only through NEPA but also considered and evaluated through Section 106 consultation.

This alternative would have significant adverse impacts to the trail, trail resources and visitor experience.

Washington Rochambeau Revolutionary Route National Historic Trail Impacts:

The proposed transmission line and towers would directly cross the national historic trail and be directly visible from routes of the French and British forces on the James River, as well as vantage points along what is now Colonial National Historical Park. For portions of the trail the transmission line and towers would be in the immediate foreground of view. The line and towers would introduce a major new industrial use in the context of a landscape which has been identified as retaining an appearance evocative of the 17th century. Further, a new transmission corridor crossing the river and the trail would be effectively unscreenable. There would be no possibility of eliminating visual impacts to the main trail route and key trail resource sites. Such a major unscreenable industrial use would significantly contrast with the setting, feeling, historic landscape and natural landscape features associated with this historic property.

This alternative would have significant adverse impacts to the trail, trail resources and visitor experience.

Nationwide Rivers Inventory (NRI) Listings:

James River, Mogarts Beach to Hopewell:

The impacts noted above for the various historic properties from this alternative would represent a significant adverse effect on the outstandingly remarkable historic values for which this segment of the James River is listed on the NRI.

Please note that the NPS anticipates providing additional analysis of the impacts of this alternative on historic properties in the coming weeks.

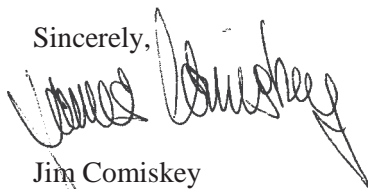
Summary

The table included as attachment A provides a summary of potential impacts of the alternatives on historic properties. A full assessment of effects of the proposed federal undertaking and alternatives 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 and the National Environmental Policy Act.

As described above and illustrated in attachment A, Dominion's proposed federal undertaking (alternative 7 -- Surry-Skiffes-Wheaton 500kV/230kV Line) clearly has the highest level of significantly adverse impacts on historic properties. We continue to seek evaluation of alternatives that would avoid or minimize such impacts. Several alternatives listed above, or variations of them, would do so; in particular, co-location of the line with the existing James River Bridge crossing or underground crossings. We are aware of correspondence and analysis provided to the USACE suggesting the need for and opportunities associated with such alternatives, as well as with demand-side reductions. We anticipate these being fully evaluated.

We look forward to continuing to work with you to address these concerns. In addition, we will be providing the previously mentioned additional information in the near future.

Sincerely,



Jim Comiskey
Acting Associate Regional Director, Stewardship

Attachments: A. Summary of Likely Impacts to Historic Properties

cc:

Col. Jason Kelly, Commander, Norfolk District, US Army Corps of Engineers
Reid Nelson, Director, Office of Federal Agency Programs, 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, Virginia Department of Historic Resources
Jeff Durbin, Sect. 106 Compliance Officer, National Park Service
Paul Loether, Chief, National Register of Historic Places & National Historic Landmarks, National Park Service
Joy Oakes, Senior Director, Mid-Atlantic Region, National Parks Conservation Association
Robert Nieweg, Field Director & Attorney, National Trust for Historic Preservation
Joel Dunn, President, Chesapeake Conservancy
Jameson Brunkow, James River Association
Elizabeth Kostelny, CEO, Preservation Virginia
Leighton Powell, Executive Director, Scenic Virginia
James Zinn, Save the James Alliance

Kym Hall, Superintendent, National Park Service, Colonial National Historical Park
Chuck Hunt, Superintendent, National Park Service, Chesapeake Bay

Attachment A:

	Summary of Likely Impacts to Historic Properties				
Alternative	Colonial NHP	Carter's Grove NHL	Captain John Smith Chesapeake NHT	Washington-Rochambeau RR NHT	NRI Listing
1. No Action	None	None	None	None	None
2. Retrofit Yorktown Units	None	None	None	None	None
3. Repower Yorktown	Unknown	Unlikely	Unknown	Unknown	Unknown
4. Combination Generation	Unknown	Unknown	Unknown	Unknown	Unknown
5. New Generation	Unknown	Unknown	Unknown	Unknown	Unknown
6a. James River Bridge Crossing	None	None	Minimal to none	Minimal to none	Minimal to none
6b. Chuckatuck Newport News	None	None	Possible, but unknown	Minimal to none	Minimal to none
6c. Surry Whealton 500	None	None	Minimal to none	Minimal to none	Minimal to none
6d. Chickahominy Lanexa 500	None	None	Likely limited	Minimal to none	Likely limited
6e. Chickahominy Skiffes 500/230	Likely limited	None	Significantly adverse	None	Significantly adverse
6f. Surry-Skiffes Underground 230	Minimal to none	Minimal to none	Minimal to none	Minimal to none	Minimal to none
6g. Surry-Skiffes U-ground 500AC	Minimal to none	Minimal to none	Minimal to none	Minimal to none	Minimal to none
6i. Surry-Skiffes U-ground 500DC	Minimal to none	Minimal to none	Minimal to none	Minimal to none	Minimal to none
7. Surry-Skiffes-Whealton 500/230	Significantly adverse	Significantly adverse	Significantly adverse	Significantly adverse	Significantly adverse