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United States Department of the Interior

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Northeast Region
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Philadelphia, PA 19106

**US Army Corps of Engineers
Norfolk District Regulatory
Office
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October 22, 2015

Colonel Jason E. Kelly, Commander
U.S. Army Corps of Engineers, Norfolk District
803 Front Street
Norfolk, VA 23510

Dear Colonel Kelly:

The National Park Service thanks you for hosting the recent Dominion Surry-Skiffes Creek-Whealton Transmission Line consulting parties meeting on October 15. We feel progress was made in the Section 106 process specific to Dominion's proposal to construct an overhead line across the James River. At the consulting parties meeting you requested that the NPS and other consulting parties provide you with feedback on where we are in the Section 106 process. Before providing input on that subject we must once again state that the proposal to construct an overhead power line across the James River in this location would result in an unacceptable level of damage to this historically important area.

The proposed overhead line would cross through Virginia's "Historic Triangle" and have substantial impacts on several nationally significant historic properties listed on the National Register of Historic Places. The power line would cross directly over the water route of the Captain John Smith Chesapeake National Historic Trail and be within sight of Jamestown Island, the Colonial Parkway, Carter's Grove Plantation National Historic Landmark (NHL), and several other significant historic resources. The damage to the historic integrity of these resources should be avoided at all costs. In no other place in United States do we have a concentration of historic resources like this, in particular, Jamestown, the country's very first permanent English settlement.

In response to the question regarding the status of the Section 106 process for Dominion's overhead power line proposal, the NPS is satisfied that the USACE has completed the Identification of Historic Properties step (CFR 800.4, Step 2 of the 4-step 106 process). We believe the USACE is still in the process of conducting the Assessment of Adverse Effects (CFR 800.5, Step 3 of the 4-step 106 process). USACE has provided the consulting parties with a substantial document (Cultural Resources Effects Assessment, Surry-Skiffes Creek-Whealton Transmission Line Project, Surry, James City, and York Counties, Cities of Newport News and Hampton, Virginia) that outlines an initial determination of the effects on the many historic properties that USACE has identified to exist within the project's area of potential effect. The NPS is currently reviewing that important document and will be providing the USACE with a response to that document by the requested November 12 deadline.

The severity of the Dominion overhead line proposal in an area concentrated with nationally significant historic resources requires a thorough Section 106 process be completed. The multiplicity of effects to so many unique resources and the region, combined with the sheer magnitude and complexity of any mitigation needs to address these effects, should point to one conclusion: an overhead power line proposal is unsuitable in this location. We also feel that continuing to pursue a permitting application for Dominion's overhead power line proposal will most certainly result in a determination that an EIS will be needed to satisfy the requirements of the National Environmental Policy Act.

We thank you for your continued serious attention on this matter, which I believe you already know, is of great concern to the NPS.

Respectfully,

/s/ Michael A. Caldwell

Michael A. Caldwell
Regional Director
Northeast Region