
To: Mr. Randy Steffey
U.S. Army Corps of Engineers
Norfolk District
803 Front Street
Norfolk, VA 23510

From: Christine Conrad, PhD
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File: Surry – Skiffes Creek - Whealton
#203446520

Date: February 27, 2015

**US Army Corps of
Engineers
Norfolk District
Regulatory Office
Received by: RLS
Date: March 2, 2015**

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

On February 12, 2015, the U.S. Army Corps of Engineers (Corps) provided Stantec Consulting Services Inc. a copy of the comments received during the second public notice period, which solicited comments on historic properties and alternatives for the Surry – Skiffes Creek – Whealton application. This memo summarizes comments received during this period as well as questions posed during the December 9, 2014 Consulting Parties Meeting. The National Parks Conservation Association (NPCA), Chesapeake Conservancy, Council of Virginia Archaeologists, Colonial Williamsburg Foundation, First California Company - Jamestowne Society, the Garden Club of Virginia, and Preservation Virginia submitted comments in opposition to the project. Form letter comments were also received from citizens through Preservation Virginia, the National Historic Trust for Preservation (NHTP), NPCA, James River Association, and the Garden Club of Virginia. Substantive personalized comments provided with the form letters are included in the summary. A letter was also received from the new owner of Carter's Grove. One letter, which included a signed petition, was submitted in support of the proposed alternative. Summaries of the comments received are provided below along with Stantec's response indicating where we believe these topics have been addressed previously. Additionally, we have attached a summary of questions from the December 9, 2014 consulting parties meeting. These are based on the written transcript of the meeting.

Requests for a Public Hearing/Public Meeting

Multiple parties, including all form letters, requested that the Corps hold a public meeting or public hearing so that the public could comment, ask questions, and be informed of the project's effects. There was also a request for additional written comment periods.

During the December 9, 2014 consulting parties meeting, the Corps explained in detail the decision making process as to whether a public hearing will be held. The Section 106 consultation plan prepared by the Corps will offer additional comment periods by consulting parties and the public.

Requests for an Environmental Impact Statement

Multiple parties, including all form letters, requested that the Corps prepare an Environmental Impact Statement (EIS) for the project. Preservation Virginia form letters stated that an EIS was required to evaluate all environmental impacts, including impacts to the federally endangered Atlantic sturgeon.

During the December 9, 2014 consulting meeting, the Corps explained in detail the permitting process and how they will determine whether the project may cause significant effects to the environment, which is the trigger to prepare an EIS. The National Oceanic and Atmospheric Administration's (NOAA) National

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

Marine Fisheries Service (NMFS) has determined that the proposed alternative “may affect, not likely to adversely affect” the Atlantic sturgeon.

Alternatives

Multiple parties, including many prepared form letters, stated that there has been no meaningful consideration of alternatives, alternatives exist, and/or that alternatives must be explored that would not adversely affect historic properties. Several commenters requested that a third party prepare or review alternatives. Some commenters stated that specific alternatives are available and must be explored including:

- Underground alternatives. One commenter specifically noted an HVDC buried line, including reference to the 1000 MW Champlain Hudson Power Express project. Some commenters made statements that Dominion is planning to build offshore wind generation with underground cables. One commenter made the statement that although underwater lines are initially more costly, they are highly resistant to weather outages. Several commenters noted that James City County requires undergrounding [of distribution lines].
- One commenter stated that the threats of rolling blackouts are scare tactics.
- Using an existing crossing such as at the James River Bridge or at Hopewell
- One commenter stated that the U.S. has enough potential oil and gas supplies for the foreseeable future to warrant some reassessment of the cost of energy generation.
- One commenter made reference to the letter from Waine Whittier, RLC Engineering, which states there are technically viable alternatives.
- Several commenters stated that Yorktown Power Station can be converted to natural gas or that natural gas can be brought in to the Chesapeake Energy Center.
- Some commenters suggested using renewable energy, such as wind, solar, and using solar parking lots and roadways.
- One commenter stated that while the proposed route is the best to minimize the destruction of natural resources and impacts to property owners, the transmission line should be put underground.
- One commenter rejected underground due to underwater archaeological impacts.
- One commenter stated that an extension of MATS deadline and repowering Yorktown with natural gas can be sought as an alternative.
- One commenter state there are better places to put the line like across Fort Eustis, the industrial park, or over railroad tracks or interstates.
- A letter was received from Colonial Heritage voicing support for the proposed alternative and stating opposition to the Chickahominy – Skiffes Creek Route. The letter referred to the SCC decision to approve the proposed route. The letter was signed by over 400 homeowners. Objections to the Chickahominy – Skiffes Creek Route include:
 - New, previously undeveloped existing ROW on both sides of the Chickahominy River that would significantly affect the natural scenic character of that leg of the John Smith Trail (JST).
 - Impacts to 28.53 miles of private lands.

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

- 1,129 homes, multiple subdivisions, 3 schools and 2 public parks within 500 feet of the alternative.
- Over 420 acres of trees to be cleared, including approximately 107 acres of forested wetlands, as well as the only area in the lower James River region designated “outstanding” for tits ecological integrity in the Virginia Natural Landscape Assessment conducted by the Natural Heritage Program.
- The route passes through the heart of the Chickahominy Indian community and may negatively impact that community and the viewshed from its Tribal Center and Powwow grounds.

Alternatives have been thoroughly explored through the PJM Regional Transmission planning process, SCC process and in support of the Joint Permit Application. A detailed alternatives analysis evaluating the practicability of available alternatives was submitted to the Corps on November 6, 2014 and addresses the comments received.

Identification of Historic Resources

General Comments

A number of comments were received concerning the historic nature of the area and James River. Some commenters called this section of the James a wilderness or pristine. One commenter stated that this area of the James is highly regarded by the Virginia tribes.

A few commenters stated that the investigations of historic properties were inadequate. Colonial Williamsburg Foundation (CWF) stated that the assessment of archaeological site locations is flawed and incomplete. CWF stated that the investigations fail to acknowledge that proposed project is located in section of the James River continuously occupied by Native Americans since the Late Pleistocene, and more recently, was a locus of concerted British colonial settlement commencing with the construction of the Jamestown Fort. CWF further states that the assessment of archaeological sites is unrealistically limited and incomplete because it relies only on sites recorded with the DHR. Excavations at four nearby properties boldly illustrate the richness of multiple unrecognized sites within properties in proximity to Jamestown, Middle Plantation, and Williamsburg. CWF lists Carter’s Grove, Kingsmill, Governor’s Land, and Flowerdew Hundred as examples. CWF states that the examples given by them illustrate that riverside properties in the area are exceptionally rich in unexplored archaeological sites. The Stantec work offers no predictive model and includes no substantial survey work of its own. Stantec report ignores the rich documentary resources for early settlement on properties such as Hog Island.

Several comments noted that Congress named this stretch of river as “America’s Founding River” and that Virginia has declared the James “an historic river with noteworthy scenic and ecological qualities” in §10.1-419 of the Code of Virginia.

One commenter wants to see a more thorough survey of the resources discovered through remote sensing, as well as surveys of the areas in which towers are to be constructed. He suggests “ground truthing” similar to what is done on land.

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

One commenter stated that through the Nationwide Rivers Inventory, the NPS has designated 62 miles of the James as “one of the most significant historic, relatively undeveloped rivers in the entire northeast region. Within or adjacent to the corridor are 4 National Historic Register Sites and one National Historic Park.”

One commenter noted that Skiffes Creek was the other site of the Colonial ferry landings which brought goods across the James River and people to the area. It also provided skirmish cover for Confederate assaults to protect the James River.

One commenter stated that as a professional archaeologist, he has participated on a number of studies on both sides of the James River and knows firsthand that the proposed towers would be visible from the location of many significant archaeological resources that may or may not have been evaluated for their NRHP eligibility. There are likely additional, as-yet undefined archaeological and/or architectural districts present within the viewshed of the proposed project. The existing boundaries of previously recorded resources such as Carter’s Grove may need to be expanded to accurately reflect the NRHP contributing elements of these resources.

In their letter dated January 15, 2015, the Virginia Department of Historic Resources (DHR) has stated that all archaeological and architectural investigations have been conducted according to applicable federal and state standards. To date, Stantec has provided all requested studies and evaluations as directed by the Corps and DHR.

Captain John Smith National Historic Trail

Several commenters responded specifically to the NRHP eligibility of the John Smith National Historic Trail (JST). Commenters specifically pointed to the Congressional designation of the National Historic Trail and that the National Park Service (NPS) Advisory Board made a determination that the JST is nationally significant. Commenters also stated that the National Park Service (NPS) and DHR considers JST as eligible for the listing on the NRHP. Commenters stated that the examples of National Historic Trail eligibility given in Stantec’s November 10, 2014 were irrelevant because the JST is a water trail.

As the Advisory Council for Historic Preservation (ACHP) explained during the December 9, 2014 consulting parties meeting, the Congressional and NPS designations are not the same requirements as eligibility for the NRHP. The Corps will make an eligibility determination of historic properties in consultation with DHR. DHR has not made a recommendation of eligibility, but had stated that they recommended it be treated as eligible. Stantec continues to raise the questions posed in our November 10, 2014 letter concerning the eligibility of a water trail that commemorates an exploratory expedition. The February 13, 2015 letter from the Keeper of the National Register concerning the eligibility of the JST for a project in Pennsylvania supports our supposition that a water route of exploration is not eligible in and of itself.

Historic Property Effects**General Comments**

Numerous commenters made statements concerning irreparable damage to significant historic, natural and cultural resources. Some commenters stated that the effects themselves would be significant. Commenters specified effects to Carter’s Grove, Jamestown Island, Colonial Parkway, Colonial National Historic Park, and the JST. Several commenters objected to Stantec’s recommendations that there be a finding of “no adverse

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

effect” on several sites, including the Colonial Parkway and Jamestown Island. Several commenters said there was an inadequacy of consultation between Corps and consulting parties and the predetermination of “No Adverse Effects” on many resources without true consultation and with insufficient information.

Stantec has made recommendations of effects to properties listed in or eligible to be listed in the NRHP based upon viewshed analyses and professional experience. The DHR has not yet made a determination on effects to properties listed in or eligible for listing in the NRHP.

Viewshed Analysis General Comments

Several commenters stated that comprehensive viewshed analysis has not taken place for impacts to historic resources. Commenters stated that no viewshed analysis has been conducted from river for the JST. Some commenters stated that vantage points chosen in the viewshed assessment do not adequately address the impacts on Jamestown National Historic Site, Colonial Parkway, and Carter’s Grove. One commenter from the Colonial Williamsburg Foundation stated the visual effects assessment does not consider the impact on the Colonial Parkway, Carter’s Grove, Kingsmill, or the JST.

One commenter questioned what he saw as the inconsistent nature of the visual impact assessment conducted by Stantec. He wants to see some rubric for what constitutes an adverse visual effect. This pertains particularly to the Colonial Parkway and the determination that even though towers will be visible, there will not be an adverse visual effect. He would like to see studies that show distance will result in no intrusion in the landscape. He states there is also no review of secondary literature that discusses viewshed assessments and how final determinations are made.

The initial visual effects analysis and the addendum prepared in October 2014 utilized standard industry practices and accurately reflect how the towers will be seen from these resources. Comment from DHR on these reports is currently pending.

Jamestown Island

Several commenters disagree with Stantec’s determination of no adverse effect to Jamestown. One commenter disagrees with the determination that Jamestown Island will not be adversely affected because of the undeveloped nature of the island’s northeast tip. The commenter stated that if the towers are constructed, Jamestown Island can no longer provide visitors the experience of being in and seeing a landscape reminiscent of 1607.

Stantec made the recommendation of no adverse effect for Jamestown Island based upon the visual effects analysis and a determination that the characteristics of the resource that lead to its listing on the NRHP would not be diminished.

Carter’s Grove

One commenter stated that the project also impacts Carters Grove, which in addition to the Georgian manor and landscape, it is the site of one of the earliest conflicts between Europeans and Native Americans, Martin’s Hundred. The owner of Carter’s Grove also commented that he was very concerned about impacts to the property, but was unable to participate personally at this time in consultation.

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

Stantec has made a recommendation of adverse effect to Carter's Grove and will work through the Section 106 consultation process to determine appropriate mitigation.

Captain John Smith National Historic Trail

Several commenters referenced impacts to the JST specifically. The Chesapeake Conservancy stated that the adverse impact the project would have on JST would be significant. They stated that the Corps has not adequately assessed the effects of the project on the JST.

A determination of eligibility has not been made on the JST; therefore, no recommendation of effects has been made.

Cumulative Effects

Several commenters specifically noted consideration of cumulative effects. The National Trust for Historic Preservation stated that the impact would degrade Virginians' quality of life and proud heritage, and the region's tourism economy. The Garden Club of Virginia stated that the scenic, historic, and economic viability of the area is at risk.

Preservation Virginia stated that the cultural and historic resources have been viewed as individual sites, rather than as part of a whole along a water highway. The Chesapeake Conservancy requests that Corps evaluate cumulative impacts including the encouragement of inappropriate development and decline in tourism. They stated that the loss of integrity to historic and cultural landscape would deter cultural tourism and economic benefit to the region. This tourism provides over \$1 billion in annual visitor spending and \$80 million in state and local taxes.

CWF stated that the argument that the construction of the transmission lines will not substantially damage an area that is already industrialized illustrates that industrial development spawns more industrial development. Most of the James River shoreline is now undeveloped and scenic, and its archaeological resources undamaged. Construction of the lines would significantly damage a visually unspoiled part of the river and adjoining land, opening it to further development.

Cumulative Effects that the project may have on historic resources in particular have not been fully addressed pending the conclusion of the historic property identification phase of the Section 106 process. Once this identification phase has come to conclusion and all properties that may be affected by the project have been identified and documented by the DHR and USACE, an assessment of cumulative effects may take place in concert with the Agency recommendations of effect. An assessment of cumulative effects should take into account the potential effect the project may have to a resource in concert with past, present and reasonably foreseeable future effects.

Other Comments

Other comments were received that commented on topics outside the subject of alternatives and historic resources. These comments include:

- Kingsmill Resort will lose the ability to develop to its full potential. The view from Kingsmill will be ruined.

Reference: Summary of Corps Public Notice Comments and Questions from the December 9, 2014 Consulting Parties Meeting

- The towers pose a threat to shipping.
- The towers will be vulnerable to hurricanes/tornados.
- Kepones in the sediment.
- The towers will discourage further waterfront development.
- The view from the ferry will be impacted.
- Light pollution from the tower lighting.
- Light effects on wildlife.
- One commenter stated that habitat, sedimentation, and migratory bird impacts would occur.
- One commenter stated there would be impacts to aviation.

Stantec has addressed these issues previously in the Joint Permit Application and subsequent information provided to the Corps.

A matrix of specific comments is provided as an attachment to this letter. A list of questions from the December 9, 2014 consulting parties meeting, based upon the meeting transcript, is also attached. If you would like Stantec to address any of these comments further, please let me know.

STANTEC CONSULTING LTD.

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Attachment: Comment Matrix

Attachment: Questions from the December 9, 2014 Consulting Parties Meeting

cc. Courtney R. Fisher, Dominion Virginia Power
Wade Briggs, Dominion Virginia Power
Dave Ramsey, Stantec

Reference: Public Notice Comment

Chesapeake Conservancy Letter Dated December 5, 2014

Commenting Party	Topic/Issue	Comment
Chesapeake Conservancy	Historic Property Identification	Congress named this stretch of river as "America's Founding River" and that Virginia has declared the James "an historic river with noteworthy scenic and ecological qualities" in §10.1-419 of the Code of Virginia.
Chesapeake Conservancy	Historic Property Identification	National Park System Advisory Board, same body that certifies national and historic landmarks as nationally significant, made determination that JST is nationally significant. JST is considered by the NPS and DHR as eligible for listing on the NRHP. June 12, 2014 letter, DHR "strongly recommends the Captain John Smith Chesapeake National Historic Trail as NRHP eligible."
Chesapeake Conservancy	Effects	Adverse impact the project would have on JST would be significant. Corps has not adequately assessed the effects of the project on the JST. Previous Visual Effects Assessment did not provide analysis or modeling of visual impacts from the JST visitor prospective.
Chesapeake Conservancy	Effects	Vantage points chosen in this assessment do not adequately address the impacts on Jamestown National Historic Site, Colonial Parkway, and Carter's Grove.
Chesapeake Conservancy	Cumulative Impacts	Request that Corps evaluate cumulative impacts including the encouragement of inappropriate development and decline in tourism. Loss of integrity to historic and cultural landscape would deter cultural tourism and economic benefit to the region. This tourism provides over \$1 billion in annual visitor spending and \$80 million in state and local taxes.
Chesapeake Conservancy	Public Hearing	Requests a public meeting to be held, including a full discussion and consideration of project alternatives with the consulting parties.
Chesapeake Conservancy	EIS	Level of significance of historic resources warrants a full EIS.

Reference: Public Notice Comment

Colonial Heritage Petition Dated December 4, 2014

Commenting Party	Topic/Issue	Comment
Colonial Heritage	Alternatives/ Chickahominy - Skiffes	The Chickahominy Alternative would require Dominion to develop new, previously undeveloped existing ROW, including ROW on both sides of the Chickahominy River that currently has little or no development on either side, creating an inconsistent use that would significantly affect the natural scenic character of the area that is a leg of the JST.
Colonial Heritage	Alternatives/ Chickahominy - Skiffes	The Chickahominy Alternative impacts 28.53 miles of private lands.
Colonial Heritage	Alternatives/ Chickahominy - Skiffes	The Chickahominy Alternative crosses within 500 feet of 1,129 homes and crosses over multiple subdivisions, three schools and two public parks.
Colonial Heritage	Alternatives/ Chickahominy - Skiffes	Over 420 acres of trees would be cleared permanently, including approximately 107 acres of forested wetlands, as well as the ONLY area in the lower James River region designated "outstanding" for its ecological integrity in the Virginia Natural Landscape Assessment conducted by the Natural Heritage Program at the Virginia Department of Natural Resources.
Colonial Heritage	Alternatives/ Chickahominy - Skiffes	The Chickahominy Route passes through the heart of the Chickahominy Indian community and may negatively impact that community and the view shed from its Tribal Center and Powwow grounds.
Colonial Heritage	Approve Proposed Route	Urge the Corps to permit the SCC-approved Surry-Skiffes Creek Route in an area where currently there is a power station and associated transmission lines, a chemical plant, an army base and active shipping activities.

Reference: Public Notice Comment

Colonial Williamsburg Foundation Letter Dated December 5, 2014

Commenting Party	Topic/Issue	Comment
Colonial Williamsburg Foundation	Effects	Assessment of long-term impact on archaeological resources is grossly understated and assessment of site locations is flawed and incomplete. Fails to acknowledge that proposed project is located in section of the James River continuously occupied by Native Americans since the Late Pleistocene, and more recently, was a locus of concerted British colonial settlement commencing with the construction of the Jamestown Fort.
Colonial Williamsburg Foundation	Alternatives	Suggests alternative of locating line near the James River Bridge.
Colonial Williamsburg Foundation	Cumulative Effects	Argument that the construction of the transmission lines will not substantially damage an area that is already industrialized illustrates that industrial development spawns more industrial development. Most of the James River shoreline is now undeveloped and scenic, and its archaeological resources undamaged. Construction of the lines would significantly damage a visually unspoiled part of the river and adjoining land, opening it to further development.
Colonial Williamsburg Foundation	Historic Property Identification	Assessment of archaeological sites is unrealistically limited and incomplete because it relies only on sites recorded with the DHR. Excavations at four nearby properties boldly illustrate the richness of multiple unrecognized sites within properties in proximity to Jamestown, Middle Plantation, and Williamsburg. Lists Carter's Grove, Kingsmill, Governor's Land, and Flowerdew Hundred. The examples given illustrate that riverside properties in the area are exceptionally rich in unexplored archaeological sites. The Stantec work offers no predictive model and includes no substantial survey work of its own.

Reference: Public Notice Comment

Colonial Williamsburg Foundation Letter Dated December 5, 2014 (cont.)

Commenting Party	Topic/Issue	Comment
Colonial Williamsburg Foundation	Historic Property Identification	Stantec report ignores the rich documentary resources for early settlement on properties such as Hog Island.
Colonial Williamsburg Foundation	EIS	Need to complete an EIS.

Reference: Public Notice Comment

Council of Virginia Archaeologists Letter Dated December 5, 2014

Commenting Party	Topic/Issue	Comment
Council of Virginia Archaeologists	Alternatives	Request an unbiased third party prepare an alternatives analysis report on the practicality of a subsurface line or routing the line along existing corridors.
Council of Virginia Archaeologists	Effects	Question the inconsistent nature of the visual impact assessment conducted by Stantec. Wants to see some rubric for what constitutes an adverse visual effect. This pertains particularly to the Colonial Parkway and the determination that even though towers will be visible, there will not be an adverse visual effect. Would like to see studies that show distance will result in no intrusion in the landscape. There is also no review of secondary literature that discusses view shed assessments and how final determinations are made.
Council of Virginia Archaeologists	Historic Property Identification	Concerned with the possible disturbance of submerged archaeological resources in the James River. Want to see a more thorough survey of the resources discovered through remote sensing, as well as surveys of the areas in which towers are to be constructed. Suggest "ground truthing" similar to what is done on land.
Council of Virginia Archaeologists	Effects	Number of sites in the indirect Area of Potential Effect (APE) speaks to the historic nature of the area. Disagrees with the determination that Jamestown Island will not be adversely affected because of the undeveloped nature of the island's northeast tip. If the towers are constructed, Jamestown Island can no longer provide visitors the experience of being in and seeing a landscape reminiscent of 1607. The project also impacts Carters Grove, which in addition to the Georgian manor and landscape, it is the site of one of the earliest conflicts between Europeans and Native Americans, Martin's Hundred.

Reference: Public Notice Comment

First California Company, Jamestowne Society email Dated November 25, 2014

Commenting Party	Topic/Issue	Comment
First California Company, Jamestowne Society	Public Hearing	Requests public meetings and there be additional written public comment periods.
First California Company, Jamestowne Society	EIS	Requests a public meeting.
First California Company, Jamestowne Society	Effects	Object to Stantec's recommendations that there be a finding of "no adverse effect" on several sites, including the Colonial Parkway and Jamestown Island.
First California Company, Jamestowne Society	Alternatives	Expect that through consultation, they will be given an opportunity to discuss and review project alternatives that will avoid, minimize or mitigate the harms to historic properties. Currently proposed crossing has severe and unforeseeable adverse impacts on a variety of nationally significant historic properties.

Reference: Public Notice Comment

Garden Club of Virginia Letter Undated and Associated Form Letters with Various Dates

Commenting Party	Topic/Issue	Comment
Garden Club of Virginia and Garden Club of Virginia Form Letters	Historic Property Identification	Congress designated the James River the Founding River.
Garden Club of Virginia and Garden Club of Virginia Form Letters	Effects/Cumulative Effects	The scenic, historic, and economic viability of the area is at risk
Garden Club of Virginia and Garden Club of Virginia Form Letters	Effects	Project would ruin many natural, historic, and scenic resources along the James River, including the JST, Jamestown National Historic site, and Carter's Grove.
Garden Club of Virginia and Garden Club of Virginia Form Letters	Alternatives	Cost-effective and reliable alternatives will achieve the objective of the applicant.

Reference: Public Notice Comment

James River Association Form Letters Various Dates

Commenting Party	Topic/Issue	Comment
James River Association Form Letters	Effects	The proposed project will harm historic, natural and scenic resources along the James River including the Captain John Smith Chesapeake National Historic Trail, the Colonial Parkway, Jamestowne Island, and Carter's Grove.
James River Association Form Letters	Alternatives	Alternative project approaches have not been thoroughly explored and considered.
James River Association Form Letters	Public Hearing	The Corps must convene a public meeting.
James River Association Form Letters	EIS	The Corps must complete an EIS.

Reference: Public Notice Comment

National Parks Conservation Association (NPCA) Letter Dated December 5, 2014

Commenting Party	Topic/Issue	Comment
NPCA	Effects	Irreparable damage to nationally and internationally significant historic, natural and cultural resources. Especially concerned with negative impacts to Captain John Smith Chesapeake National Historic Trail (JST), Jamestowne Island, Carter's Grove, Colonial Parkway and Colonial National Historic Park.
NPCA	Effects/Process	Inadequacy of consultation between Corps and consulting parties and the predetermination of "No Adverse Effects" on many resources without true consultation and with insufficient information.
NPCA	Effects	Beyond belief that 17 300-foot tall lighted towers would not have an adverse impact in these landscapes. Disturbed that the process has incorrectly minimized the proposal's impact to many resources and has left other historic resources completely out of consideration.
NPCA	Effects	A comprehensive view shed analysis has not taken place for impacts to historic resources. No view shed analysis has been conducted from the river for the John Smith Trail (JST).
NPCA	Historic Property Identification	"Extremely disturbed" with the November 10, 2014 letter from Stantec concerning the eligibility of the JST as a historic resource. Rather than relying on the Congress who enacted a federal law to honor the historic importance of the JST, the National Park Service (NPS) that outlines the many ways the JST is significant; or even the Virginia Department of Historic Resources (DHR) that the JST is eligible for inclusion on the National Register of Historic Places (NRHP), Stantec asks the Corps to rely on the Oregon State Historic Preservation Office to conclude that the trail is not historic.

Reference: Public Notice Comment

National Parks Conservation Association (NPCA) Letter Dated December 5, 2014 (cont.)

Commenting Party	Topic/Issue	Comment
NPCA	Alternatives	Imperative that the Corps ensure that all alternatives are thoroughly explored and foreseeable impacts addressed. Alternatives have been presented including routing to an existing crossing or putting the lines underground.
NPCA	Public Hearing	Request a public hearing to allow citizens to ask questions and offer input.
NPCA	Environmental Impact Statement (EIS)	Asks that the Corps complete an Environmental Impact Statement (EIS).

Reference: Public Notice Comment

NPCA Form Letters Various Dates

Commenting Party	Topic/Issue	Comment
NPCA Form Letters	Deny Permit	Deny the permit to place transmission towers in the JST and in the view shed of Colonial National Historical Park.
NPCA Form Letters	Effects	Historic resources would be irreplaceably damaged by 17 heavily-lit transmission towers.
NPCA Form Letters	Alternatives	Alternatives exist that would allow us to meet our energy needs without sacrificing our country's special places.
NPCA Form Letters	EIS	The Corps should complete an EIS.
NPCA Form Letters	Public Meeting	The Corps should hold a public meeting.
NPCA Form Letters, Individual Comments	Alternatives	Energy should come from alternative sources such as wind and solar, including putting solar in parking lots/roadways.
NPCA Form Letters, Individual Comments	Sturgeon	Comments concerning potential effects to Atlantic sturgeon.
NPCA Form Letters, Individual Comments	Effects	Tower lighting will cause light pollution. Lighting effects on wildlife.

Reference: Public Notice Comment

NPCA Form Letters Various Dates (cont.)

Commenting Party	Topic/Issue	Comment
NPCA Form Letters, Individual Comments	Historic Property Identification	This area of the James is highly regarded by the Virginia tribes.
NPCA Form Letters, Individual Comments	Alternatives	Commenter rejects underground alternatives due to impacts to underwater archaeological sites.
NPCA Form Letters, Individual Comments	James River	Some commenters referred to this section of the James River as a wilderness or pristine.

Reference: Public Notice Comment

National Trust for Historic Preservation (NTHP) Form Letters with Various Dates

Commenting Party	Topic/Issue	Comment
NTHP Form Letters	Effects	Current plan would harm nationally significant natural, historic, and scenic resources along the James River, including the JST, Colonial National Historical Park, Jamestown Island, and Carter's Grove Plantation.
NTHP Form Letters	Cumulative Effects	Impact would degrade Virginians' quality of life and proud heritage, and the region's tourism economy.
NTHP Form Letters	Alternatives	Alternatives exist and should be fully explored.
NTHP Form Letters	EIS	Corps must prepare an EIS.
NTHP Form Letters	Public Hearing	Convene public meetings to solicit public input about this controversial proposal.
NTHP Individual Comments	Alternatives	References to using an HVDC buried line, including reference to the 1000 MW Champlain Hudson Power Express project. Also statements that Dominion is planning to build offshore wind generation with underground cables. Statement that although underwater lines are initially more costly, they are highly resistant to weather outages.
NTHP Individual Comments	Alternatives	The U.S. has enough potential oil and gas supplies for the foreseeable future to warrant some reassessment of the cost of energy generation.
NTHP Individual Comments	Alternatives	Comments concerning alternative routes on land.
NTHP Individual Comments	Alternatives	Convert Yorktown Power Station into natural gas generation.

Reference: Public Notice Comment

National Trust for Historic Preservation (NTHP) Form Letters with Various Dates (cont.)

Commenting Party	Topic/Issue	Comment
NTHP Individual Comments	Historic Property Identification	Through the Nationwide Rivers Inventory, the NPS has designated 62 miles of the James as "one of the most significant historic, relatively undeveloped rivers in the entire northeast region. Within or adjacent to the corridor are 4 National Historic Register Sites and one National Historic Park."
NTHP Individual Comments	Historic Property Identification	Skiffes Creek was the other site of the Colonial ferry landings which brought goods across the James River and people to the area. It also provided skirmish cover for Confederate assaults to protect the James River.
NTHP Individual Comments	Historic Property Identification	Commenter stated that as a professional archaeologist, he has participated on a number of studies on both sides of the James River and knows firsthand that the proposed towers would be visible from the location of many significant archaeological resources that may or may not have been evaluated for their NRHP eligibility. There are likely additional, as-yet undefined archaeological and/or architectural districts present within the view shed of the proposed project. The existing boundaries of previously recorded resources such as Carter's Grove may need to be expanded to accurately reflect the NRHP contributing elements of these resources.
NTHP Individual Comments	Alternatives	Commenter acknowledged that the proposed route is the best to minimize the destruction of natural resources and impacts to property owners, but the transmission line should be placed underground.
NTHP Individual Comments	Impacts Unrelated to Historic Resources	<ul style="list-style-type: none"> • Impacts to Kingsmill Resort including the view and development potential. • The structures pose a threat to shipping. • The towers will be vulnerable to hurricanes/tornados. • Kepones in the sediment. • The towers will discourage further waterfront development. • The view from the ferry will be impacted.

Reference: Public Notice Comment

Preservation of Virginia Letter Dated December 6, 2014 and Associated Form Letters with Various Dates

Commenting Party	Topic/Issue	Comment
Preservation Virginia	Historic Property Identification	To date, the cultural and historic resources have been viewed as individual sites. The context of the water highway has been ignored. Analysis should be undertaken to view these resources as part of a whole.
Preservation Virginia and associated form letters	Effects	The current plan will impact National Historic Landmarks and eligible resources including Historic Jamestowne, the Colonial Parkway, Carter's Grove, and the JST.
Preservation Virginia and associated form letters	Alternatives	No meaningful examination of alternatives has been undertaken to avoid harm to the cultural, scenic and historic sites along the James River and the James River itself. Viable alternative approaches would ensure the protection of the resources and the economic survivability of the region's heritage tourism based economy.
Preservation Virginia and associated form letters	Public Hearing	The James River is a national and internationally significant asset. The Corps must convene a public hearing so that the full impact of the project can be explored and viable alternatives to the current approach can be explored.
Preservation Virginia and associated form letters	EIS/Sturgeon	An EIS should be undertaken to examine the impact to natural resources, including the endangered sturgeon population.

Reference: Public Notice Comment

Individual Citizen Comment Letters Various Dates

Commenting Party	Topic/Issue	Comment
Individual Commenters	Alternatives	No meaningful examination of alternatives
Individual Commenters	Alternatives	Use underground alternative. Some commenters noted that James City County requires undergrounding of utility lines.
Individual Commenters	Alternatives	Use the existing James River Bridge crossing or crossing at Hopewell.
Individual Commenter	Alternatives	Desire to have full discussion of alternatives with the Section 106 consulting parties.
Individual Commenter	Alternatives	Commenter states that Dominion should pursue an extension of the MATS deadline and repowering Yorktown with natural gas as an alternative.
Individual Commenter	Alternatives	The proposed gas pipeline can provide gas to replace coal at Yorktown and Chesapeake.
Individual Commenter	Alternatives	Find a better place to put the lines like across Fort Eustis, the industrial park, or over railroad tracks or interstates.
Individual Commenters	EIS	Several commenters requested an EIS.
Individual Commenters	Public Hearing	Several commenters requested a public hearing.

Reference: Public Notice Comment

Individual Citizen Comment Letters Various Dates (cont.)

Commenting Party	Topic/Issue	Comment
Individual Commenter, Colonial Williamsburg Foundation	Effects	The visual effects assessment does not consider the impact on the Colonial Parkway, Carter's Grove, Kingsmill, or the JST. The potential impact on known and unknown archaeological sites is frightening.
Individual Commenter	Natural Resource Effects	One commenter stated that habitat, sedimentation, and migratory bird impacts will occur.
Individual Commenters	Cumulative Effects	A few commenters noted impacts to tourism and economics.
Individual Commenter	Aviation Effects	One commenter stated there would be impacts to aviation.

Reference: Public Notice Comment

Ms. Margaret Fowler Email Dated January 15, 2015

Commenting Party	Topic/Issue	Comment
Margaret Fowler	SCC Process Bias	Claims that the SCC process was biased and not thorough.
Margaret Fowler	Project Need	Claims that Dominion's statements on rolling blackouts if the project is not constructed are scare tactics.
Margaret Fowler	EIS	There must be an EIS completed.

Reference: Public Notice Comment

Mr. Samuel Mencoff, Owner of Carter's Grove Letter Undated

Commenting Party	Topic/Issue	Comment
Samuel Mencoff	Effects/Carter's Grove	Very concerned about the impacts of the transmission line on Carter's Grove, but am unable to participate personally as a consulting party at this time.



Corps Meeting
December 9, 2014
Questions

1. When can we take a look at the consultation with Fish and Wildlife Service on the sturgeon and other listed species? (pg 19 and 20)
2. When will the Corps conclude its consideration for a public hearing and make a decision on whether one will be held? (pg 22)
3. Can you give us a time frame for when you will tell us the number of comments that came in? And can you provide a summary of the issues raised in those comments? (pg 24)
4. Does the Corps now concur that Colonial National Historic Parkway is on the National Register and that this project will be an adverse impact to this unit of the National Parks (pg 26)
5. Can you comment about the depth of the Army's Engineering Department review of alternatives and where you are in that process? (pg 28 and 29)
6. Will you be able to provide the analysis that the engineers are doing to the consulting parties and the general public? (pg 29)
7. How will the Corps be evaluating the eligibility of the trail and is it going to be focused on this area that will be impacted? (pg 38)
8. Our understanding is that the Smith Trail is a resource through all of the individual [project] segments, which we'll be reviewing in the context of historic properties today, correct? So the segment that you've just listed [Skiffes-Wheaton] would affect the John Smith Trail, correct? (pg 40)
9. Did you come prepared to go through a table of resources? (pg 43)
10. Did the NTHP video take into account the differing tower heights? They all appear to be the same height? (pg 68 and 69)
11. What is your evaluation of the Washington Rochambeau Revolutionary Route National Historic Trail? (pg 70)
12. How many acres is site No. 44JC0662? (pg 92)