United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, D.C. 20240

Office of the Director

DEC 1 1 2015

Lieutenant General Thomas P. Bostick
US Army Chief of Engineers and Commanding General
US Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

Dear General Bostick:

The National Park Service would like to convey our serious concerns about the impacts of the proposed Dominion Surry-Skiffes Creek-Whealton Transmission Line project. This project would seriously impact irreplaceable, nationally significant resources.. Running power lines through the landscape where the earliest days of American history were written will forever change the ability of Americans to experience and understand our nation's earliest days.

The proposed overhead line would mar the historic setting that represents the very beginnings of and the military defense of our nation. It would be a massive and modern industrial intrusion in a landscape that retains the feeling and appearance of long ago. It would cross directly over the open water route of the Captain John Smith Chesapeake National Historic Trail. It would be within sight of Jamestown Island and the Colonial Parkway. It would set a precedent for additional development and cumulative effects. It would forever degrade, damage, and destroy the historic setting of these iconic resources. This is not acceptable for resources designated by Congress to ensure their permanent protection.

The National Park Service (NPS) has been communicating with the USACE Norfolk District for more than two years regarding this proposal. Regional Director Mike Caldwell of the National Park Service Northeast Region has spoken with Norfolk District Commander Colonel Jason Kelly. Regional and park staffs have met and communicated regularly with Norfolk District staff. We appreciate the USACE's continuing consultation with us. Throughout these consultations, the NPS has been consistently clear in communicating our high level of concern about the impacts of this proposal.

Last week NPS staff met with the USACE Chief of the Regulatory Branch for the Norfolk District and Project Manager for the current Dominion proposal. They informed the NPS that Dominion intends to submit a plan later this week that outlines Dominion's proposal to mitigate the adverse effects of the company's preferred alternative to build an overhead line across the James River within view of Jamestown Island.

The November 23, 2015, Presidential Memorandum on Mitigating Impacts on Natural Resources from Development notes that, "When a resource's value is determined to be irreplaceable, the preferred means of achieving [the mitigation goal] is through avoidance, consistent with applicable legal authorities."

The project would cause severe and unacceptable damage to this historically important area and the irreplaceable and iconic national resources within it. As stated in the President's memorandum the choice here is avoidance, not mitigation.

While the proposed towers and overhead line would have significant impacts on many historic resources, Jamestown Island, Colonial National Historical Park, and the Captain John Smith Chesapeake National Historic Trail are national treasures that represent the very beginnings of this nation. These treasures were specifically designated by Congress to allow the American people to forever learn and experience our national story through places preserved in perpetuity.

We know from decades of experience protecting and managing nationally significant historic resources such as the John Smith Chesapeake Trail, Jamestown Island, and the Colonial Parkway that people value and understand their history and heritage through experiencing it in place. The historic setting of these resources is integral to being able to understand each and their connection to each other. It is a setting that has survived intact for over 400 years and the reasons presented by the utility company should not compel you to permanently mar this national resource.

The NPS is working with state and local organizations to get the Jamestown Island placed as a significant site on the list maintained by United Nations Educational, Scientific, and Cultural Organization (UNESCO). This is the first step to designation as a World Heritage Site. This project will jeopardize those efforts, eliminating the potential for the Commonwealth of Virginia to claim the home to a World Heritage site and attract millions of visitors from around the world.

The NPS has not participated in discussions regarding mitigation because the Section 106 Assessment of Effects has not been sufficiently completed, nor has the Army Corps' NEPA compliance considered other viable alternatives. We understand the USACE has determined the proposal would have an adverse effect to historic resources in the area, but repeat that the specific effects have not been fully clarified and the severity of those effects has not yet been identified or agreed on. The severity of the Dominion overhead line proposal in such an iconic landscape requires thorough and complete assessment. Once that assessment has been sufficiently completed we believe the sheer magnitude of irreversible impacts will be clear and point to one conclusion: an overhead power line proposal is unsuitable in this location. No amount of mitigation could possibly counteract the severity of the effects that would be caused by this proposal. We urge the USACE to deny the permit for the proposed overhead line and to encourage Dominion Virginia Power to further examine the many other solutions available through an Environmental Impact Statement.

On the eve of the centennial of the NPS, this proposal has become one of the most serious threats to our nationally significant historic resources. This nation has only one Jamestown.

Thank you for your continued serious attention on this matter.

Sincerely,

Jonathan B. Jarvis
Director

cc: Major General Donald E. Jackson, Jr., US Army Corps of Engineers
cc: Assistant Secretary JoEllen Darcy, Department of Defense
cc: Molly Ward, Secretary of Natural Resources, Commonwealth of Virginia