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Section 56-46.1(B) of the Code of Virginia requires that prior to approving a transmission line project, the SCC must determine that the route will reasonably minimize the adverse impact on the scenic and historic assets and the environment of the area considered. The same section requires the SCC to consider the economic benefits likely to result from underground placement of the lines. To help the SCC fulfill these duties, I offer the following facts and observations regarding the adverse impacts of the proposed lines and routes on the scenic and historic assets of the project area, as well as the economic importance of those historic assets.

The only alternative consistent with the Prince William County Comprehensive Plan is the I-66 Hybrid Alternative, which would place the line underground from just west of the interchange of Rt. 29 and I-66 to the proposed Haymarket Substation. Dominion Virginia Power studied four other alternative routes: I-66 Overhead Alternative, Carver Road Alternative, Madison Alternative, and the Railroad Alternative. All four of these routes have substantial direct and indirect impacts on important facets of Prince William County's history, the State of Virginia's history, and our nation's history. Only the I-66 Hybrid Alternative Route adequately mitigates the impacts on properties eligible for and listed in the National Register of Historic Places and the Virginia Landmarks Registry; given the route would utilize both overhead and underground transmission facilities (Vol 2 pg 84). Whereas, the I-66 Overhead route will have the greatest visual impacts when compared to the I-66 Hybrid Alternative. The direct impacts within the proposed right of way are similar for both the I-66 Hybrid and the I-66 Overhead alternatives.

Some of the most affected history by Dominion's proposed alternatives are four Civil War Battlefields and the Journey Through Hallowed Ground National Historic Area and National Scenic Byway.

- Second Battle of Manassas (076-5190)
- Thoroughfare Gap Battlefield (030-5610)

- Buckland Mills Battlefield (030-5152)
- Manassas Station Operations Battlefield (076-5036)
- Journey Through Hallowed Ground National Historic Area

All of the alternatives cut through four Civil War Battlefields.

There are 384 principal Civil War battlefields identified by the American Battlefield Protection Program, the program tasked by Congress to help our nation preserve military history that occurred on our soil.

Eight of the 384 principal battles of the Civil War are located in Prince William County. Of those eight, four are in the path of the five alternatives whose viewsheds and the land over which our ancestors fought and died for will be irrevocably destroyed forever. All of these battles are nationally significant, significant at the state level and locally significant. These battles were of special strategic, tactical, or thematic importance to local operations, campaigns, theaters, or to the Civil War as a whole. These battles are the fabric and landscape of our County's history, that our citizens retain a deep visceral connection to; and are the fabric of our Nation's history that Prince William County has fought to preserve.

These battles were recognized by U.S. Congress when they commissioned the Civil War Sites Advisory Commission and created the American Battlefield Protection Program to identify and help preserve them. Our Board of County Supervisors recognized the importance of these battles by amending our comprehensive plan to classify large portions of the First and Second Manassas battlefields, Buckland Mills Battlefield and Thoroughfare Gap Battlefield as County Registered Historic Sites, and by amending our zoning ordinance to include all eight battlefields in our cultural resource assessment that is required for all re-zonings, special use permits, and comprehensive plan amendments.

All of the Alternatives cross and destroy a portion of the Manassas Station Operations Battlefield and the Second Battle of Manassas.

Manassas Station Operations Battlefield, and the Second Battle of Manassas

On the evening of August 26, 1862 after passing around General Pope's right flank via Thoroughfare Gap, General Jackson's wing of the Confederate army struck the Orange & Alexandria Railroad at Bristoe Station, and before daybreak, August 27, marched to capture and destroy the massive Union supply depot at Manassas Junction. This surprise movement forced General Pope into an abrupt retreat from his defensive line along the Rappahannock River. On August 27, Jackson routed a Union brigade near Union Mills (Bull Run Bridge), inflicting several hundred casualties and mortally wounding Union Brig. Gen. G.W. Taylor. Ewell's Division fought a brisk rearguard action against Hooker's division at Kettle Run, resulting in about 600 casualties. Ewell held back Union forces until dark. During the night of August 27, Jackson marched his divisions north to the First Manassas battlefield, where he took position behind an unfinished railroad grade.

The Second battle of Manassas occurred on August 28, 1862. In order to draw General Pope's army into battle, Jackson ordered an attack on a Federal column that was passing across his front on the Warrenton Turnpike on August 28. The fighting at Brawner Farm lasted several hours and resulted in a stalemate. Pope became convinced that he had trapped Jackson and concentrated the bulk of his army against him. On August 29, Pope launched a series of assaults against Jackson's position along an unfinished railroad grade. The attacks were repulsed with heavy casualties on both sides.

At noon on August 29, 1862, General Robert E. Lee along with Lieutenant General James Longstreet arrived on the field from Thoroughfare Gap and took position on General Stonewall Jackson's right flank. On August 30, Pope renewed his attacks, seemingly unaware that Longstreet was on the field. When massed Confederate artillery devastated a Union assault by Fitz John Porter's command, Longstreet's wing of 28,000 men counterattacked in the largest, simultaneous mass assault of the war. Think about this for second, in one day, in one event, 28,000 men massed and counterattacked. What a formidable sight, cannon, rifle, and musket firing, soldiers marching in formation to their death, cavalry riding down roads, conducting intelligence on troop movements and size. This counter assault crushed the Union left flank and the Union army was driven back to Bull Run. Only an effective Union rearguard action prevented a replay of the Union's First Manassas disaster.

Again, I want to emphasize that while all alternatives cross and destroy a portion of the Manassas Station Operations Battlefield and the Second Battle of Manassas,

only the I-66 Hybrid Alternative adequately mitigates the visual impact to these nationally and locally important cultural resources.

Battle of Thoroughfare Gap

The Second Battle of Manassas was preceded by the Battle of Thoroughfare Gap. Perhaps if the outcome of the Thoroughfare Gap Battle was different, the second Battle of Manassas might have been different. On August 28, 1862 Union General James Ricketts' Union forces marched from Haymarket down Thoroughfare Gap Road, Route 55, to stop the Confederate advance through the Gap. When Ricketts' forces arrived, the Confederates had already obtained the Gap. Ricketts was able to halt or slow the Confederate advance. However, it was a Confederate column's flanking maneuver through Hopewell Gap, several miles to the north, which then secured the high ground that forced Ricketts' hand. Ricketts' forces retired, and Longstreet's wing of the army marched through the Gap to join Jackson. This seemingly inconsequential action virtually ensured Pope's defeat during the battles of Aug. 29-30, because it allowed the two wings of Lee's army to unite on the Manassas battlefield. Ricketts withdrew via Gainesville to Manassas Junction.

The views and the terrain to the Gap and down Route 55 towards the Gap are remarkably unaltered. You can stand on ground and see what the soldiers of Ricketts' forces saw as they marched and rode towards their battle at the Gap. The I-66 Overhead alternative will insert 120 foot tall transmission towers into this viewshed, dramatically altering it forever.

Buckland Mills Battlefield

After defeat at Bristoe Station and an aborted advance on Centreville, General J.E.B. Stuart's cavalry shielded the withdrawal of General Lee's army from the vicinity of Manassas Junction. Located along the Route 15 and Route 55 corridors was the Buckland Mills Battlefield, which was fought October 19, 1863, marking the last Confederate cavalry victory during the Civil War. Union cavalry, under Kilpatrick, pursued Stuart's cavalry along the Warrenton Turnpike, where he was halted at the Buckland Bridge.

For at least two hours, Stuart held a position on the west side of the bridge, with artillery and sharpshooters placed in the town, thwarting any attempt by Kilpatrick's cavalry to cross. After unsuccessful attempts to assault the front, Kilpatrick began flanking maneuvers. Stuart gave up his position at the bridge and in the Town of Buckland, and feigning retreat towards Warrenton in order to set a trap for Kilpatrick's cavalry, which Fitzhugh Lee, commanding the other division of Stuart's cavalry, had conceived earlier that morning. The trap itself hinged upon Stuart luring Kilpatrick's cavalry far enough down the turnpike so that Fitzhugh Lee could regain the bridge and cut off any Federal attempt at re-crossing Broad Run. The plan nearly succeeded. Union General Henry Eugene Davies' brigade was cut off by Fitzhugh Lee's forces and was forced to ford Broad Run and retreat overland. Custer with most of his brigade was not cut off from the bridge during retreat because he had decided not to follow Davies' brigade down the turnpike. Eventually, Custer's brigade succumbed to the Confederate cavalry and like Davies' brigade became scattered and were chased five miles eventually to Haymarket, in an affair that came to be known as the "Buckland Races."

All of the transmission line alternatives will have a direct impact on this battlefield, but only the I-66 Hybrid Alternative avoids the visual impact to the Core Ground of the battle.

Journey Through Hallowed Ground

In addition to the negative impacts on important cultural resources already mentioned, all of the proposed alternatives cut through the Journey Through Hallowed Ground National Scenic Byway (the Byway), which was designated on October 16, 2009 by the U.S. Secretary of Transportation as the nation's 99th National Scenic Byway, one of the highest honors the U.S. Secretary of Transportation can bestow upon a public road.

The Byway in Prince William County includes U.S. Route 15 and U.S. Route 29 and its environs. Within its area is a unique set of historic, natural and scenic resources, with farms; woodlands and forests; rolling hills, streams and mountain views; and unspoiled landscapes that can be explored by car, bike, canoe or kayak, on foot or on horseback. It encompasses the four Civil War Battlefields previously mentioned, Native American settlements, historic houses, historic downtowns such as Haymarket, Buckland and Brentsville, courthouses, wineries, and inns. The

Journey promotes tourism throughout Prince William County by linking our historic sites together.

Effects on Tourism

Since all of the alternatives impact our history and the historic sites and parks in Prince William County, we remain very concerned about the negative impact on tourism. For example, the alternatives impact Manassas National Battlefield Park, which remains in our top five tourist attractions and generates between 600,000 to 750,000 visitors annually.

A 2004 study of four battlefields by the Civil War Trust found these visitors visited an average of seven battlefields, and 75% of them traveled to the area specifically to see the battlefields. Furthermore, the average Civil War battlefield visitor spends \$51.58 per day, 72% of them stayed in paid accommodations and spent 2 to 3 nights in the community.

Benefits of Battlefield & Viewshed Preservation

The report titled “The Dollar\$ and Sense of Battlefield Preservation: The Economic Benefits of Protecting Civil War Battlefields,” documents the fiscal, cultural, and environmental benefits of preserving battlefields (Frances H. Kennedy & Douglas R. Porter, National Trust for Historic Preservation, Information Series - 1998). Whether preserved and open to the public or preserved by private owners dedicated to good stewardship, battlefields can contribute to the economic vitality, sustainability, and quality of life of a community in several key ways:

- As income generators
- As open space
- As fiscal assets

These economic benefits translate into fiscal benefits for state and local governments. According to the U.S. Travel Data Center, every dollar of business sales to visitors generates an average of 7.3 cents in state and local tax revenue (Kennedy and Porter, pg. 4). Unlike residential and even some commercial lands,

open space typically generates more tax revenues than it demands in public expenditures (Kennedy and Porter, pg. 5).

Closing Remarks

In closing, I would like to reiterate that only the I-66 Hybrid alternative adequately mitigates impacts of the proposed transmission lines. Prince William County routinely caps the height of structures located within these important historic resource areas, and we ask that you protect these resources for future generations.