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June 13, 2017

Anna Lawston
USACE Norfolk District
Warrenton Field Office
PO Box 578
Amissville, Virginia 20106

RE: Midwood Project in Haymarket, Virginia (CENAO-2006-01343)

Dear Ms. Lawston:

I am writing on behalf of the Civil War Trust, the nation's premier nonprofit organization devoted to the preservation of America's hallowed battlegrounds. To date, the Trust has helped preserve more than 46,000 acres of battlefield land in 23 states, including more than 91 acres associated with the Battle of Buckland Mills.

The Battle of Buckland Mills was a significant engagement in the Bristoe Campaign that followed the Union victory at Gettysburg in July 1863. Three months after the Gettysburg Campaign, the Army of the Potomac under Maj. Gen. George G. Meade and Robert E. Lee's Army of Northern Virginia maintained close contact with each other in Virginia as Meade moved north towards Centreville. After defeat at Bristoe Station five days earlier, Maj. Gen. J. E. B. Stuart's cavalry shielded the withdrawal of Lee's army south from the vicinity of Manassas toward the Rappahannock River.

Union cavalry under Brig. Gen. Judson Kilpatrick pursued Stuart's troopers along the Warrenton Turnpike west of Gainesville but were lured into an ambush near Chestnut Hill on October 19th. A division of Rebel cavalry under Maj. Gen. Fitzhugh Lee turned on the Yankee cavalymen under Brig. Gen. George A. Custer as they rested near the turnpike. Lee's division suddenly attacked from the south, pushing Custer's troopers back across the Broad Run bridge and separating his brigade from the rest of Kilpatrick's command. The Federal troopers were scattered and chased five miles in an affair that came to be known as the "Buckland Races." Most of the Federal casualties were captured during the retreat. Stuart termed the rout, his last victory over cavalry, "the most complete that any cavalry...suffered during this war." Custer called the day "the most disastrous this division ever passed through." Out of approximately 12,000 forces engaged, there were 310 total estimated casualties.

The Trust is aware that the U. S. Army Corps of Engineers is currently conducting a Section 106 review for the proposed construction by VADa of two buildings to be part of a three-building data center on a 38.5-acre parcel in Prince William County, Virginia. The acreage in question is located well within the "core" battlefield boundary of the Buckland Mills Battlefield as determined by the federal Civil War Sites Advisory Commission (CWSAC) and its *Report on the Nation's Civil War*

Battlefields. Established in 1990, CWSAC was tasked by Congress to identify America's most important Civil War sites. Out of the approximately 10,500 Civil War conflict sites, the Buckland Mills Battlefield is one of only 384 battles identified by the Commission as the most important and worthy of preservation. We agree with the determination made by the Corps, in consultation with the Virginia State Historic Preservation Officer, that this undertaking will have an adverse effect on the Buckland Mills Battlefield.

However, we share the concern of several other consulting parties that VADa's construction of Building 1 on the southern part of the larger 62-acre parcel, suggests that the original undertaking, construction of a three-building data center, has been inappropriately segmented. As the Advisory Council on Historic Preservation noted in their May 7, 2017 letter to Mr. Marshall Tucker Smith, Chief, Northern Section, Regulatory, Corps of Engineers, Norfolk District, if the construction of the three-building data center has been segmented, then "the Corps has not considered the effects of the construction of Building 1 on historic properties or consulted with the Virginia State Historic Preservation Officer to address the applicability of Section 106 to this portion of the undertaking." Given the destruction of hallowed ground that has resulted from the construction of Building 1, as well as from the clearing and grading of much of the 38.5 acres currently under review by the Corps, we find these irregularities to be troubling.

Further, we believe that the current undertaking being reviewed by the Corps should include consideration of the construction of the new 230kV double circuit transmission line and substation that will be dedicated to serving the needs of the data center. Not only do plans call for a 230-34.5 kV Haymarket Substation to be constructed on battlefield land adjacent to the three-building data center, but the data center will require upwards of 97 percent of the power that would be supplied by the proposed transmission line. With the State Corporation Commission having recently recommended either the Railroad or Carver Road alternative, we would echo the concerns expressed by Prince William County Archaeologist Justin Patton that either route will have an adverse impact on historic resources and are both inconsistent with the Prince William County Comprehensive Plan. Both of these routes will cut through hallowed ground and have an adverse visual impact on battlefields in Prince William County including Manassas Station Operations Battlefield, Second Manassas Battlefield, Thoroughfare Gap Battlefield, and the Buckland Mills Battlefield. These routes also cut through the Journey Through Hallowed Ground National Scenic Byway, designated in 2009 as the nation's 99th National Scenic Byway.

We echo the call by the Advisory Council on Historic Preservation for the Corps to:

- (1) Clarify its rationale for considering a permit application focused only on the construction of two out of three buildings that are intended to comprise a three-building data center; and

- (2) Explain how it has considered the linkage between the permit application for construction of the two remaining buildings with the construction of the 230-34.5 kV substation at the data center site and the construction of the Gainesville to Haymarket 230kV double circuit transmission line by Dominion.

Further, we share the concerns expressed by several other consulting parties that VADData's actions in conducting extensive clearing and ground preparation across the entire 62-acre site, including the proposed locations of Buildings 2 and 3, was carried out prior to the completion of the Section 106 review process and caused adverse impact to the Buckland Mills Battlefield. Given VADData's actions, the Trust believes that the Corps must consider the applicability of Section 110(k) of the NHPA to this undertaking.

We do not oppose economic development or the improvement of utilities service in Prince William County; however, we do not believe that achieving progress on this front and maintaining the integrity of the Commonwealth's Civil War battlefields need be mutually exclusive. Our experience has been that while there can always be alternative locations for development and routes for utilities, there are no replacements for a loss of our history, in particular Civil War battlefields.

We thank you for your consideration of this matter. Please do not hesitate to contact me or Adam Gillenwater, State and Local Relations Associate, at (202) 367-1861 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Lighthizer', with a stylized flourish at the end.

Jim Lighthizer, President

John Eddins, Program Analyst, Advisory Council on Historic Preservation
Dan Holmes, Director of State Policy, Piedmont Environmental Council
Julie Langan, Director, Virginia Department of Historic Resources
The Honorable Jeanine Lawson, Supervisor, Brentsville District
The Honorable Robert G. Marshall, Delegate, 13th District
Kristen McMasters, Archeologist and Grants Manager, ABPP
Elizabeth Merritt, Deputy General Council, National Trust for Historic Preservation
Elena Schlossberg, Executive Director, Coalition to Protect Prince William County