



United States Department of the Interior

NATIONAL PARK SERVICE
Fredericksburg and Spotsylvania
National Military Park
120 Chatham Lane
Fredericksburg, Virginia 22405



IN REPLY REFER TO:
1.D (FRSP)

September 3, 2021

Mr. Joshua Gillespie
Orange County Planning & Development Services
ATTN: REZ 21-02 (Wilderness Crossing)
Planning and Development Services
128 West Main Street, Orange, VA 22960

Dear Mr. Gillespie:

I am writing on behalf of the National Park Service (NPS) to convey our concerns on the proposed rezoning for the Wilderness Crossing development, which is proposed to be located adjacent to the Wilderness Battlefield unit of Fredericksburg and Spotsylvania National Military Park. The Wilderness Crossing development has the potential to shape the future development of eastern Orange County. As such, it also holds the potential to play a critical role in the future of the Wilderness Battlefield.

The Wilderness Battlefield is a preservation priority 1.2 (Class A) battlefield as determined by Civil War Sites Advisory Commission, which was established by Congress in 1990 to assess the state of preservation of the nation's Civil War battlefields. The commission's findings included the identification of 384 principal battlefields of the Civil War and the ranking of these battlefields by their historical significance and the need and opportunity for preservation.

We have reviewed the materials submitted for the rezoning application and posted to Orange County's website; and we do not believe that the effects of the proposal upon the battlefield, or other historic properties in the vicinity, have been addressed or even identified. Although the current application does not recognize the presence of the National Military Park, we believe that the project has the potential to have significant impacts on the Wilderness Battlefield. These potential impacts will likely be in the form of direct, indirect, and cumulative impacts, as the project progresses to completion over the years-long construction period. In addition, the projections for traffic counts related to the development foresee tens of thousands additional vehicle trips, a number that would greatly stress the existing rural road system. Such traffic projections are especially concerning for the Route 20 corridor and the National Military Park, as there are few alternatives to meet area transportation needs and no other alternative for visitors to access the battlefield.

We also note that the plans submitted with the application reference the "Future Route 20 Realigned" – a proposed road that would cross lands that are within the congressionally

authorized boundary of the park and connect with existing Route 20 deep within the Wilderness Battlefield. This road is identified in the Germanna-Wilderness Area Plan and has been referenced by the applicants in the media. This road realignment was addressed in the earlier Wilderness Battlefield Gateway Study (2012) and identified as potentially not feasible due to cost, design concerns, and impacts on historic resources. As you are aware, the NPS has long expressed reservations about this proposal, both for its direct effects upon the historic lands it would cross and, also for the cumulative effects upon the entire Route 20 corridor passing through the battlefield. Building a new major road across lands identified by Congress as worthy of perpetual protection would be unprecedented for this region.

Wilderness Crossing is likely the largest single project of its kind ever proposed adjacent to or near the National Military Park. We recognize the considerable challenges of integrating a historic battlefield landscape into a modern and growing community. This project is especially complex, with impacts both direct and indirect, in the near-term and long-term. We believe that the time to identify and address those impacts is now, as part of a thorough and comprehensive review of the project in its earliest stage.

The NPS is not opposed to development or to improving the economic future of Orange County. We support solutions that will enhance the quality of life of residents, support the aspirations of the community at large, and help us fulfill the mandate of Congress to preserve the Wilderness Battlefield for the benefit of all Americans.

We stand ready to assist Orange County with planning for our joint future while working to identify, address, and ameliorate the potential impacts of this project on one of our nation's special places.

Sincerely,

[electronic submission – hard copy to follow]

Kirsten Talken-Spaulding
Superintendent

Cc: Mr. Donald Brooks, Chair, Orange County Planning Commission
Planning and Development Services
128 West Main Street, Orange, VA 22960