

The Historic Green Springs, Inc.

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July 23, 2012

Mr. Noel G. Harrison
Manager of Easements
Fredericksburg and Spotsylvania Battlefields
Memorial National Military Park
120 Chatham Lane
Fredericksburg, VA 22405

Re: Subdivision of a 43.67 acre parcel at 8888 West Jack Jewett Road,
Green Springs National Historic Landmark District, Louisa
County, VA

Dear Noel:

Thank you for providing Historic Green Springs, Inc. an opportunity to comment on this proposed Subdivision. The Board of Directors of HGSI has carefully examined and evaluated all the documentation provided to us and, in addition, has conducted a GIS evaluation of the tract as it relates to the Green Springs National Historic Landmark District. We have concluded that the proposal will have an Adverse Effect on the National Historic Landmark District.

The subject property sits on the high ridge which surrounds the natural basin (pluton) which constitutes the National Historic Landmark and which gives the Landmark added significance. The location of the tract is adjacent to Hawkwood, which is individually listed on the National Register of Historic Places and a major component of the Green Springs National Historic Landmark District, and would be fully visible from most key locations on that property. In addition, the subject parcel, a high wooded ridge, is visible from areas beyond Hawkwood as the Landmark District is notable for its basin-like shape whose landscape rolls away from the high ridge surrounding it.

We cannot agree that this review should be limited to merely the proposed subdivision of the parcel as we believe that the actual purpose of the applicant's request is to build residential structures and outbuildings on the subdivided parcels. Accordingly, it is our view that the National Park Service must view the future clearing of the land and the construction of dwellings and other buildings as "reasonably foreseeable effects caused by the undertaking" and should reconsider its finding of No Adverse Effect as those effects would certainly be cumulative to the mere division of the land which is currently being requested.

Dedicated to the preservation of The Green Springs National Historic Landmark District

Further, since high ridges surround the 14,000 acre basin that comprises the Green Springs National Historic Landmark District, consideration must be given to the precedential effect of permitting so intrusive a proposal. If this request is granted in the front yard view-shed of Hawkwood, it is difficult to imagine a ridge-top project that the National Park Service could conclude had an Adverse Effect.

Substantial additional information should be required by the Park Service before any comment can be reasonably provided as to archeological impacts as there is currently no indication available as to the amount of land to be disturbed or the location of the land to be disturbed. For this reason the Park Service should require the applicant to provide specific details of what the construction proposals will be so that adequate comment can be adduced.

For the foregoing reasons it is the position of Historic Green Springs, Inc. that (1) the Park Service should amend its position to a finding of Adverse Effect for the requested Subdivision, and (2) the requested proposal should be denied by the National Park Service.

If you have any questions regarding this comment, please do not hesitate to contact Historic Green Springs, Inc. at 540-967-1331.

Sincerely,

A handwritten signature in black ink, reading "Rae H. Ely". The signature is written in a cursive, flowing style.

Rae H. Ely, President
Historic Green Springs, Inc.

RHE/ls