

Kimberly D. Bose, Secretary
 Federal Energy Regulatory Commission
 888 First Street, NE
 Washington, DC 20426

Union Hill/Woods Corner Rural Historic District: FERC DOCKET NOs: CP15-554-000 et al.

Dear Secretary Bose,

We write to FERC to register our greatest concerns for the historic preservation of the Union Hill/Woods Corner Rural Historic District – a 2+ mile district of former plantation lands and buildings, colonial and slave cemeteries, historic Black churches, historic Black schools – proposed for the only ACP compressor station in Virginia in Buckingham County. We are a working body of preservationists and concerned citizens who reside in and have close family ties to this highest direct impact zone of the proposed ACP project in Virginia.

The cultural resource survey work done by ACP LLC, completed July 2015 as reported to FERC, is more than woefully inadequate. In fact, there is no actual cultural resource work done by ACP contractors on the proposed compressor station site. This is an egregious omission. ACP LLC purchased land secretly for this proposed complex and never contacted landowners that their lands now bordered a proposed major industrial complex with a plan to intersect the Transco Pipeline at this site. This intensification of pipeline networks, feeder lines, and 3 above ground storage facilities all combine to ensure that Union Hill/Woods Corner Rural Historic District will face the highest threats to all historical cultural resources of any place in Virginia.

98% of the landowners are African American whose property shares boundaries with the land purchased for the compressor station in secrecy. Many are descendants of slaves who purchased this land as Freedmen before or after Emancipation, and whose slave family burials lie in cemeteries or smaller clusters in the impact zone. In this district, there are 4 standing historic Black churches with 18th – 21st C cemeteries (Union Hill Baptist, Union Grove Baptist, Mulberry Grove Baptist, and Mt. Joy Baptist); 2 sites of historic Black schools at Union Hill and Union Grove; a large (100+) slave burial ground on the former Variety Shades plantation land, part of which was sold for the compressor station. In addition, in close proximity to the compressor station site are also standing plantation homes, Wilderness, two Woods' family homes, Willow Lake, National Historic Register home Perry Hill, all with 18th - 20th C cemeteries, Mt. Tabor Church (historic White) and cemetery, and many more. Taken together these resources represent a deeply significant place of plantation history for Virginia and American History.

We submitted an application to Preservation Virginia, the nation's oldest statewide historic preservation organization, established in 1889, for Most Endangered Historic Place in Virginia for the Union Hill/Woods Corner Rural Historic District. On May 3, 2016, the compressor station district was granted this status. In addition, taken as a whole, all slave cemeteries in Virginia were named by Preservation Virginia as Most Endangered Historic Places, thus magnifying awareness of threats to historic preservation of this rural district. The reasons cited for both listings are that slave history has been largely erased by non-recognition of its importance to both Virginia and American history. This district has great historic potential for slave history tourism since at the moment these burials and landscapes are untouched by development, maintaining their rural historic character.

Preservation Virginia has offered support with needed archaeological and cultural expertise necessary to identify and document our district's historic resources, which have been – especially in the case of

slave family histories in Buckingham – quite scarcely documented to date. Buckingham County’s representative to the Virginia Department of Historic Resources (VDHR) suggests we now file the initial PIF application for eligibility for nomination for National Register of Rural Historic District status.

We consider it gravely important that FERC consider the significance of Dominion Power and its partners choosing to locate the most harmful infrastructural threat to historic cultural resources of the ACP pipeline in Virginia on a former plantation – land sold for the compressor station by descendants of white plantation owners -- that will most greatly harm slave descendants’ health, current land uses, family burials, history, and land values by nearness to its operations.

The Union Hill/Woods Corner Rural Historic District preservation team is actively engaged with local historians and preservationists, including descendants of families who have owned property in this district since the early 1700s. Groups composed of local residents who have in-depth knowledge of the structures, landscapes and family histories of both White colonial and Black slave histories include the Buckingham African American Historical Society and members of the Buckingham Historical Society.

Thank you for considering a requirement that ACP LLC conduct cultural resource surveys to redress neglect toward historic cultural threats to the compressor station environs. We will follow this comment with many photographs of neglected historic resources that led to this rural district’s designation as a Most Endangered Historic Place.

Sincerely,

Lakshmi Fjord, Ph.D., Scholar in residence, Dept. of Anthropology, University of Virginia
Charles R. White, historian, Chair of the African American Historical Society of Buckingham
John & Ruby Laury, local residents, descendants of slaves & Freedmen landowners
Chad Oba, local landowner, Chair of Friends of Buckingham
Quinn Robinson, local resident, descendant of landowners from 1852
Dorothy Bowling, local resident, member of African American Historical Society of Buckingham,
descendant of slaves & Freedman landowners
Justin Sarafin, Director of Historic Preservation Initiatives, Preservation Virginia
Sonja Ingram, Staff Archaeologist, Preservation Virginia

Document Content(s)

Union Hill comment 6.2.16.DOCX.....1-2