

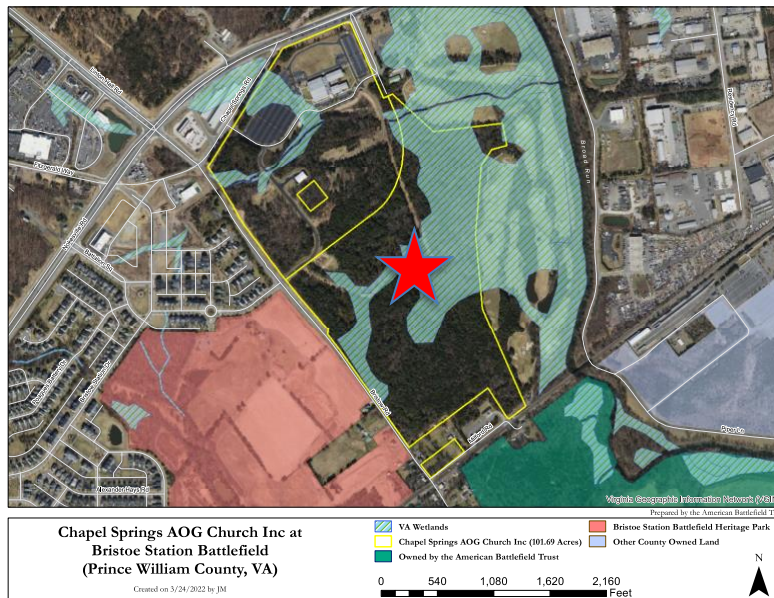
**Bull Run Civil War Round Table (BRCWRT) Preservation Corner  
January 31, 2023**



Greetings BRCWRT Members and Friends - This edition of *Preservation Corner* provides an update on the proposed distribution center development in Bristow, Va. This proposed development is on former Chapel Springs Church land that is within the designated Core Area of both the Kettle Run (Manassas Station Operations) Battlefield and the Bristoe Station Battlefield.

**Proposed Warehouse and Distribution Center Development at Bristow (Bristoe Station and Kettle Run Battlefields)**

In August 2022 commercial real estate developer Trammell Crow Company (TCC) and its affiliate Manassas Logistics Land Venture, LLC purchased 85 acres of land from Chapel Springs Church and Equinox Investments, LLC for a warehouse and distribution center development, Manassas Logistics Center. This currently forested land, located along Bristow Road and adjacent to Bristoe Station Battlefield Heritage Park (see map, below), is within the American Battlefield Protection Program (ABPP) designated Core Area of both the Kettle Run Battlefield (August 27, 1862) and Bristoe Station Battlefield (October 14, 1863).



*Proposed Project Land, Formerly Chapel Springs Church Property, Adjacent to Bristoe Station Battlefield Heritage Park*

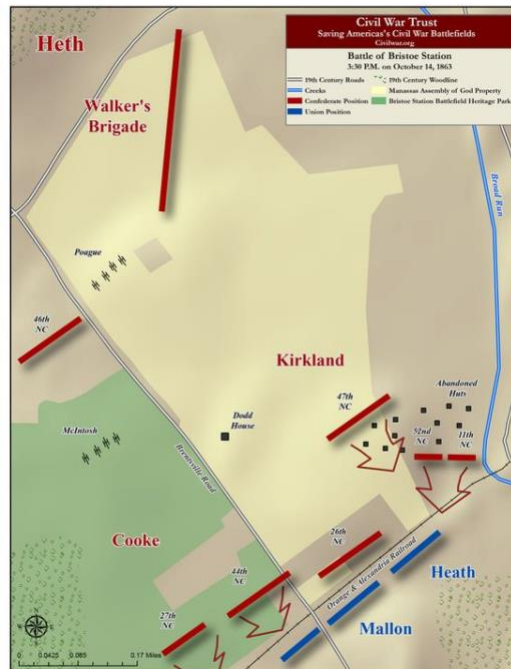
The documented civil war historical significance of this land includes the following:

- Battle of Bristoe Station (October 14, 1863) (see battle map, below)
  - The Rockbridge Artillery's (Poague's Battery) key position from which the battery shelled federal forces positioned along the Orange and Alexandria Railroad
  - The land over which Brigadier General William Kirkland's NC Brigade (formerly Pettigrew's Brigade) attacked federal forces positioned along the Orange and Alexandria Railroad

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- Remnants of hut sites of a Civil War era encampment with earthworks, and an associated cemetery containing military graves/burials (DHR-registered Archaeological Site 44PW0971 that has been recommended as potentially eligible for listing in the National Register of Historic Places [NHRP])
- In 1864 Ferrero's Division of the U.S. 9th Corps, including two brigades composed of the 19th, 23rd, 27th, 30th, 31st, 39th, and 43rd USCTs, and the 30th Connecticut Colored Infantry camped on this land while guarding the Orange and Alexandria Railroad and the bridge across Broad Run from late April to early May 1864. The division and its USCT brigades departed in early May 1864 to join the Army of the Potomac near Spotsylvania Courthouse, from where they would participate and fight in the Overland Campaign and subsequently in the Battle of the Crater in Petersburg on July 30, 1864.



Civil War Trust (now American Battlefield Trust) Map - Battle of Bristoe Station

The proposed project includes six large warehouse and distribution buildings (772,400 square feet) and associated parking areas (see Figures 1 & 2, below). The subject land is zoned M-2, Light Industrial which includes warehousing operations; however, the proposed development lies within the boundaries of several historic properties, including the Bristoe Station Battlefield and the Manassas Station Operations (Kettle Run) Battlefield, both of which have been determined eligible for listing in the NHRP, and will negatively impact several archaeological sites recently recommended as potentially eligible for listing in the NRHP.

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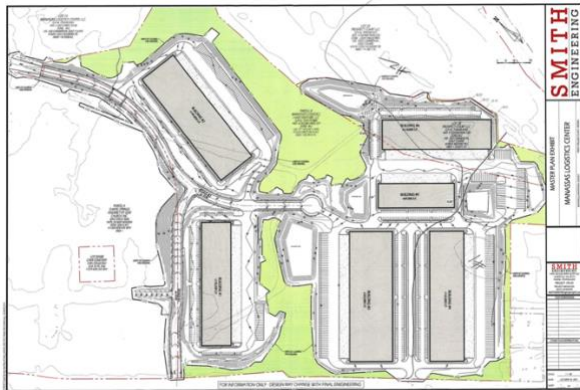


Figure 1 - Project Concept

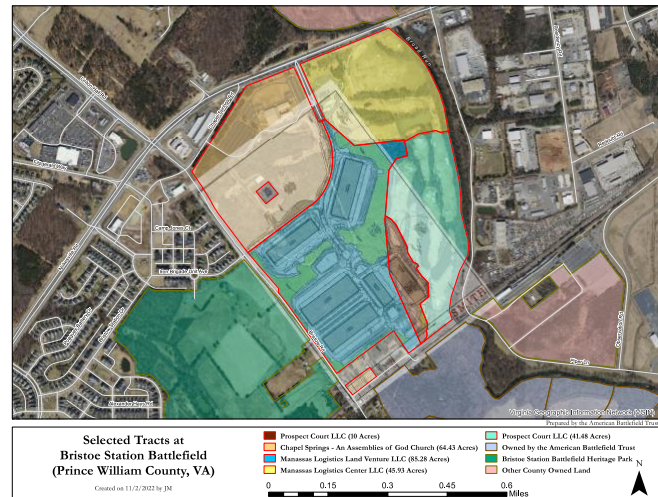


Figure 2 - Project Concept Overlaid on Property Map

Much of the land included in the proposed project area is within designated wetlands and requires U.S. Army Corps of Engineer permits for the project to proceed as planned. The Corps' permitting process coupled with the fact that the proposed project area lies within the identified historic properties and encompasses several archaeological sites, has triggered the National Historic Preservation Act's Section 106 review process which seeks to accommodate historic preservation concerns of consulting parties.

On December 21, 2022 , the Corps sent several consulting parties (American Battlefield Protection Program, National Park Service - Manassas National Battlefield Park, Prince William County, American Battlefield Trust, Historic Prince William and Bull Run Civil War Round Table) a Section 106 Coordination Form dated December 22, 2022 summarizing this "Chapel Springs Station" project and the Corps' assessment of the project from a wetlands permitting and Section 106 perspective. The Coordination Form the included an overview of the project and the Corps defined the permit area and the Area of Potential Effect (APE) as only that area where project infrastructure was adjacent to or crossed waterways or stream beds. The document also included the Corps' conclusion that no features associated with Civil War resources were identified within the permit area, that the viewshed is no longer intact in this area and the setting has been compromised by the construction of Centreville Road and I-66 that along with 20<sup>th</sup> century residential and commercial development in and around the project area has altered the battlefield landscape from its appearance in the 1860s. Based on their analysis and this conclusion, the Corps determined that the project as proposed would not adversely affect the battlefield, the battlefield landscape, or the battlefield viewshed.

The known Consulting Party responses (BRCWRT, NPS-MNBP, Historic PW and PWC, as well as Preservation Virginia and the PWC Historical Commission) to USACE regarding their determination and the information contained in the Section 106 Coordination Form documented their non-concurrence with

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the Corps' determination of No Adverse Effects. Consulting Party non-concurrence was based primarily on two factors; 1) the Corps' erroneous application of Section 106 Review criteria solely on a narrowly defined permit area focused on waterways, with no consideration for potential effects on the two contiguous historic properties, Manassas Station Operations (Kettle Run) Battlefield and Bristoe Station Battlefield Historic District that the project area and the Corps' defined permit area lie within, or on the designated archaeological sites located within the project area, and 2) the Corps' erroneous assessment that the viewshed is no longer intact in this area due to road construction and 20<sup>th</sup> century residential and commercial development in and around the project area.

In a strongly worded letter dated January 20, 2023, the Virginia Department of Historic Resources (DHR) notified the Corps of their concerns with the Corps' assessment, conclusions and determination as expressed in the Section 106 Coordination Form. DHR noted that the developer has not yet provided final project plans and recommended that, upon receipt of the final project plans, the Corps' determination regarding the APE should include the full range of physical and visual effects of the project on the numerous historic properties in and around the project area. DHR also recommended that the Corps work to identify and begin consultation with consulting parties who may have an interest in this project, including historic societies and Civil War preservation groups that have an interest in Civil War resources in the area.

Presumably based on the responses received from consulting parties on the December 22, 2022 Section 106 Coordination Form and DHR's letter, on January 30, 2023 the Corps sent consulting parties a new Section 106 Coordination Form, dated January 30, 2023, superseding the previous Coordination Form "due to updated information provided by the applicant." Though the new information from the applicant is not identified, the new Coordination Form documents a change in the Corps Effect Determination to Adverse Effect - "Based on the information available for Corps review and due to the direct and visual impacts on core areas of the two battlefields, the Corps has determined the project will have an adverse effect on the Manassas Station Operations Battlefield and the Bristoe Station Battlefield."

So, now a formal Section 106 Review process should begin - a process that will be governed by Section 106 of the National Preservation Act and a Memorandum of Agreement (MOA) establishing the purpose of this specific review and consulting party participants. The review process and MOA are intended to provide a forum and opportunity for negotiations between the developer, the Corps (as the lead federal agency) and consulting parties to remove or mitigate identified adverse effects on the threatened historic properties and sites. Stay tuned as this review process progresses.

Thank you for your continued interest in, and support of, BRCWRT's preservation actions and activities.

Blake Myers, BRCWRT Preservation Chair