

---

# WILDERNESS BATTLEFIELD COALITION

---

September 2, 2022

Mr. Mike Rolband, Director  
Virginia Department of Environmental Quality  
P.O. Box 1105  
Richmond, VA 23218

Dear Mr. Rolband,

We are writing on behalf of the Wilderness Battlefield Coalition<sup>1</sup> regarding the documented but unmitigated contamination on the site of the proposed Wilderness Crossing development in eastern Orange County.

As demonstrated with our previous correspondence<sup>2</sup>, the Coalition and National Park Service have strong objections to a mix-use development of this scale next to Wilderness National Battlefield Park. In addition to our concerns to a mixed-use development of this scale being built at the gateway to the historic Wilderness National Battlefield Park, this property was also home to what was once the largest gold mine in Virginia. We are alarmed by the extensive documentation identifying the former Vacluse Mine, among others on the property, as a potential source of mercury contamination in tributaries of the Rapidan River. This same contamination is the likely culprit for the Rapidan's mercury impairment listing. Further, many of the mines on this site have been flagged for acid mine drainage and other contaminants including cyanide.

We are aware of recent discussion(s) between Virginia Department of Environmental Quality (DEQ) staff and county officials regarding possible regulatory options for ensuring the historic mines on site are properly remediated, and that the impacted streams are adequately protected. While the proposed developer has proffered an approach to evaluate and clean up the on-site mercury contamination 'if required,' it is our understanding that DEQ has recommended that the developer participate in DEQ's Voluntary Remediation Program. We believe, based on the available scientific data on the site, that the public health risk is too great to proceed any further without your agency providing oversight and accountability; and we ask you to see that this project receives the highest level of regulatory scrutiny.

In addition, given the likelihood of this site contributing to off-site contamination of Virginia's waters, we respectfully request the agency initiate sampling for common contaminants associated

---

<sup>1</sup> The Wilderness Battlefield Coalition is composed of eight local, regional, and national organizations dedicated to the unique protecting cultural and natural resources associated with the historic Wilderness Battlefield in Orange County, Virginia. The coalition includes the Central Virginia Battlefields Trust, Friends of Wilderness Battlefield, Journey Through Hallowed Ground, Piedmont Environmental Council, Preservation Virginia, American Battlefield Trust, National Parks Conservation Association and National Trust for Historic Preservation.

<sup>2</sup> See attachments.

**Letter from the Wilderness Battlefield Coalition (continued)**

Page 2 of 2

September 2, 2022

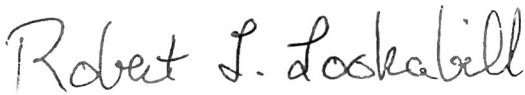
with historic gold mining at locations along the Rapidan River, Wilderness Run, and the tributaries associated with Shotgun Hill Branch. While the owner has not granted permission to access the site, many of the tributaries are accessible from the waterways themselves.

Thank you for considering our urgent request. If you have any questions, please reach out to Don McCown at the Piedmont Environmental Council at [dmccown@pecva.org](mailto:dmccown@pecva.org) or 434-977-2033, ext. 7047.

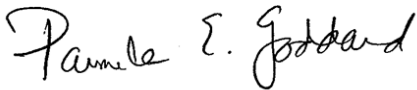
Sincerely,



James J. Campi  
American Battlefield Trust



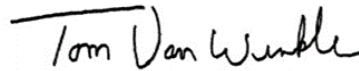
Robert Lookabill  
Friends of Wilderness Battlefield



Pamela E Goddard  
National Parks Conservation Association



Don McCown  
Piedmont Environmental Council



Tom Van Winkle  
Central Virginia Battlefields Trust



William Sellers  
Journey Through Hallowed Ground



Robert Nieweg  
National Trust for Historic Preservation



Elizabeth Kostelny  
Preservation Virginia

attachments:

- (1) September 3, 2021, letter from National Park Service to Orange County Planning Office regarding impacts of Wilderness Crossing development proposal.
- (2) October 1, 2021, letter from Wilderness Battlefield Coalition to Orange County Supervisors regarding impacts of Wilderness Crossing development proposal.
- (3) October 6, 2021, letter from National Park Service to Orange County Planning Office regarding traffic and safety impacts of Wilderness Crossing development proposal.
- (4) April 27, 2022, letter from Wilderness Battlefield Coalition to Orange County Supervisors regarding previous studies on development in Wilderness Gateway region.

cc: Orange County Board of Supervisors  
Christopher Collins, Acting Superintendent, Fredericksburg and Spotsylvania NMP



# 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

---

# WILDERNESS BATTLEFIELD COALITION

---

October 1, 2021

Orange County Board of Supervisors  
P.O. Box 111  
112 W. Main Street,  
Orange, VA 22960

Re: Wilderness Crossing Development Proposal

Dear Supervisors:

I am writing on behalf of the Wilderness Battlefield Coalition.<sup>1</sup> The purpose of this letter is to share our concerns about the proposed Wilderness Crossing development.

In 2012, our organizations partnered with Orange County and local residents to create the Wilderness Battlefield Gateway Study (attached), which provided a comprehensive look at preservation and development opportunities in the Germanna Wilderness Area (GWA). Many of the recommendations from that study were supported by the county and ultimately incorporated into the Germanna Wilderness Area Plan (GWAP) in 2015. However, just six years after the adoption of the GWAP, we are confronted with a proposal that ignores important consensus recommendations incorporated in both the Wilderness Gateway Study and GWAP, including:

- The desire to create a connected community with a careful balance between developed areas and open space
- Traffic improvements that would minimize impacts in the region
- Commitment to preserving historic sites

We feel that the current size and scope of this development would set a negative precedent for future development within the Germanna Wilderness Area (GWA) of Orange County, as well as negatively and permanently impact the historic Wilderness Battlefield. At 2,602 acres — with the potential for 4,750 residential units and 260 acres of commercial development — the Wilderness Crossing development is on a scale beyond previous development projects in this region and surpasses the projected population growth of Orange County in the next 30 years. We raise the importance of developing in line with historic and projected annual growth rates (approximately 1% population growth per year) that look no further than 20 years in the future.

Further, the land in question is directly adjacent to the Wilderness Battlefield, managed by the National Park Service as part of Fredericksburg and Spotsylvania National Military Park. The Wilderness Battlefield was determined to be one of the most historically significant battlegrounds in the nation by a blue-ribbon panel created by Congress in 1993. Of the 385 national battlefields analyzed by the Civil War Sites Advisory Commission (CWSAC), Wilderness Battlefield was classified as a *Priority I, Class A* site and is ranked within the top 12% of all battlefields analyzed.<sup>2,3</sup>

The land under consideration for development has another historic element which raises environmental and human health concerns, as at least 27 gold mining sites have been identified onsite by the Virginia Department of Mines, Minerals, and Energy (DMME). Gold mining in Virginia commonly used mercury to extract gold from ore. Virginia's Department of Environmental Quality (DEQ) and the Environmental

---

<sup>1</sup> Central Virginia Battlefields Trust, Friends of Wilderness Battlefield, American Battlefield Trust, National Parks Conservation Association, National Trust for Historic Preservation, Piedmont Environmental Council, Preservation Virginia

<sup>2</sup> <http://npshistory.com/publications/battlefield/cwsac/report.pdf>

<sup>3</sup> Priority 1, Class A sites had a decisive influence on a campaign and direct impact on the course of the Civil War.

**Letter from the Wilderness Battlefield Coalition (continued)**

Page 2 of 2

October 1, 2021

Protection Agency (EPA) have classified the adjoining two-mile section of the Rapidan River as mercury impaired. Orange County's comprehensive plan proposes two potential reservoir sites in the development area, both of which would draw from the mercury impaired section of the Rapidan River. Between existing water quality concerns and the unknowns of disturbing land with a high concentration of possibly toxic gold mining sites, we believe more analysis by the county and state is called for before approval.

As you are aware, the intersection of Route 3 and Route 20 is already overburdened from current traffic levels. We believe that this development will inevitably lead to increased traffic in the area and be utilized to justify realignment of the intersection. In fact, the property owner of the proposed development has already suggested his own land be used for such a realignment. The Wilderness Battlefield Gateway Study found that a realignment of the intersection to the proposed area would not be feasible due to cost and encroachment on historic resources. The topography of that land would necessitate the construction of a bridge, with the total realignment cost estimated at \$9.3m to \$15.5m, a figure which is likely to have increased in the intervening years.

We also feel that it is critical that Route 3 be separated from any development by a vegetation buffer, as described in the Wilderness Battlefield Gateway Study, in order to preserve the visitor experience. The study describes the need for substantial vegetative buffers of at least 100 feet for development along Route 3, utilizing large canopy trees and not including signage.

Finally, our organizations strongly endorse the recommendations included in the National Park Service's letter to Joshua Gillespie, dated September 3, 2021.

Our organizations recognize the need to balance preservation and economic development in the region. However, we believe the 2012 Wilderness Battlefield Gateway Study and the 2015 GWAP provide important roadmaps for how to sensitively develop the battlefield gateway and minimize the impacts on important cultural and environmental resources. We welcome the opportunity to discuss further with the board, as part of its consideration of the Wilderness Crossing proposal.

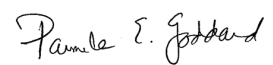
Sincerely,



Jim Campi  
American Battlefield Trust



Dan Holmes  
Piedmont Environmental Council




Pamela Goddard  
National Parks Conservation Association



Mark Leach  
Friends of Wilderness Battlefield



Tom Van Winkle  
Central Virginia Battlefields Trust



Rob Nieweg  
National Trust for Historic Preservation



Elizabeth Kostelny  
Preservation Virginia





# 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)

October 6, 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 as a follow up to our September 3, 2021 letter which the National Park Service (NPS) wrote to Orange County 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 (FRSP). The proposed Wilderness Crossing development could have substantial traffic and safety impacts to the park, park visitors, and the future of the surrounding roadways.

As part of our continuing interest and engagement on this project, we have had our transportation technical experts at the NPS review the "Wilderness Crossing Development Traffic Impact Study" with technical appendix, prepared by Gorove Slade Transportation and Engineers (dated May 8, 2020 and revised on August 13, 2020) for the proposed development. We have also reviewed the technical memo entitled "Response to Comments for Wilderness Crossing," dated August 12, 2020, which includes the Virginia Department of Transportation (VDOT) comments to the traffic study, as well as responses from Gorove Slade. The VDOT memo references the VDOT Route 3 Arterial Preservation Plan, dated January 24, 2019, prepared for VDOT by Michael Baker International, which we have also reviewed. We have enclosed our preliminary comments and questions on those documents (Enclosure 1), and we hope this information is helpful to the county planners.

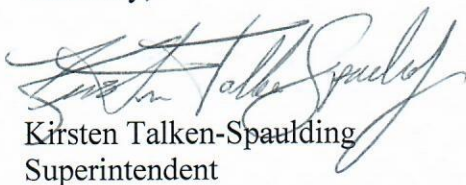
Route 3 at Route 20 is a primary access point for FRSP Wilderness Battlefield within the study area, and therefore one of the primary focus areas of our concerns. Engaging in a productive discussion with the NPS and other stakeholders will help build community consensus on a development plan that is the best for the community and future of the County. The NPS recognizes the need to balance preservation and economic development in the region, and we believe the 2012 Wilderness Battlefield Gateway Study was a good example of collaboration between the county and partners. We recommend that this study be used as a tool in guiding the development process and design for the proposed Wilderness Crossing Development. We welcome the opportunity to discuss this study further with Orange County as part of its consideration of the proposed Wilderness Crossing Development.



We also understand that VDOT may need to become more involved in the proposed development and associated road improvements, if it moves forward in the planning process. If VDOT does become more involved and receives federal funds for the proposed road improvements associated with the Wilderness Crossing Development, that would trigger the involvement from the Federal Highway Administration (FHWA) as well as the federal environmental compliance process for this project. If that happens, FHWA would need to complete compliance and that would include the National Environmental Policy Act, Section 106 of the National Historic Preservation Act, and Section 4(f) of the National Transportation Act of 1967. The NPS would work closely with Orange County, VDOT, and FHWA as they go through the environmental compliance process.

We ask you to keep the NPS abreast of any new information concerning the proposed Wilderness Crossing Development and if you have questions on our comments, please reach out to me at (540) 693-3200 x1010 or [kirsten\\_talken-spaulding@nps.gov](mailto:kirsten_talken-spaulding@nps.gov). We look forward to future meetings to further discuss this study and proposed development. In addition, we want to work with you to preserve the historical viewshed and visitor experience of FRSP.

Sincerely,



Kirsten Talken-Spaulding  
Superintendent

Enclosure: NPS Preliminary Technical Comments on Gorove Slade Traffic Impact Study

Cc – electronic delivery only:

Mr. Mark Wood, Virginia Department of Transportation ([james.wood@vdot.virginia.com](mailto:james.wood@vdot.virginia.com))

Mr. Donald Brooks, Chair, Orange County Planning Commission  
([dbrooks@orangecountyva.gov](mailto:dbrooks@orangecountyva.gov))



**Enclosure #1 - National Park Service, Fredericksburg and Spotsylvania National Military  
Park**

**Preliminary Technical Comments**

**Wilderness Crossing Proposed Development – Gorove Slade Traffic Impact Study  
Orange County, Virginia  
September 30, 2021**

**Wilderness Crossing Development Traffic Study Overview**

The Wilderness Crossing Development is located to the northeast of the Route 3 corridor, which is across Route 3 and to the north of the Fredericksburg and Spotsylvania National Military Park (FRSP) Wilderness Battlefield. The development will consist of a multi-phase buildout of approximately 2,500 acres of mixed-use development constructed over a 30-year timeframe. These comments will highlight the components of the traffic study that were overlooked or not thoroughly explained, in laypersons terms, and suggest additional consideration and detail.

**Comments and Requests for Gorove Slade**

Specific elements of the traffic study were presented in a way that was difficult to understand, especially from the perspective of a layperson. Please include the following elements to simplify the presentation and condense the information relevant to FRSP and the general public:

**1) A clear graphic representation of the development plan for each phase within the executive summary:**

The graphic should clearly show each building with the proposed building program, designated open space with proposed landscaping elements, the internal transportation network (roadways, sidewalks, bicycle routes), and the major connections to Route 3. The graphic should clearly label all roadway names and be oriented with north to the top of the page. It is understood that at this time, certain elements of the plan are not finalized and can change in the future.

**2) A concept plan of the Route 3/Route 20 intersection.**

It is our understanding that there are conflicting modification proposals presented in the 2019 Virginia Department of Transportation (VDOT) Route 3 Arterial Preservation Plan and proposed modifications detailed in the development traffic study. The VDOT plan calls for implementing a Continuous Green-T intersection (CGT) at Route 3 and Route 20 by 2026 while the Gorove Slade study references removing the CGT as part of phase 2, by 2031. FRSP would like to better understand communication between the developer and VDOT since August 2020 with respect to:

- a. Which intersection modification plan will be constructed?
- b. What is the timeframe of the decision-making process and the potential construction process of each alternative?
- c. Will there be additional opportunity for public comment or major stakeholder involvement?



- d. Details related to the future realignment of Route 20 and the connection to Wilderness Parkway, which was only mentioned in passing in the executive summary conclusion section (see Additional Comments and Concerns below).

**3) A trip generation summary table:**

The summary table should include the number of external trips (total, entering, and exiting) for each phase of development, as well as the cumulative total. The table should be supplemented with a trip distribution figure on a map showing the percentage of vehicles using the intersection of Route 3 at Route 20 and the travel route through the network showing where vehicles will have to make a U-turn maneuver if left turns are restricted. Multiple figures will be needed if the trip distribution patterns change depending on the build scenarios. The summary table and related figures should be included in the executive summary.

**4) Justification of the 1.5% growth rate:**

The traffic study documents that a 1.5% growth rate was “agreed upon by VDOT and County;” however, there is not any supporting documentation as to why this rate was chosen. According to the Virginia Route 3 Arterial Preservation Plan “between 2007 and 2017... the annual growth rate over the 11-year period was 0.73%... A 1.0% non-compounded annual background growth rate” was chosen for the planning study. A 1.5% growth rate over-estimates the background traffic that is not associated with the project resulting in “watered down” changes in traffic impacts between no-build scenarios and build scenarios. It also results in an overdesign of the automobile infrastructure along the corridor leading to increased traffic, increased land dedicated to the automobile, and increased safety issues related to the movement of non-motorized transportation alternatives.

**5) Estimation of the number of parking spaces:**

The number of parking spaces for each land use should be estimated for each phase of development. Land-uses with shared parking (to minimize overall parking impacts) should also be calculated and sourced appropriately. The total number of parking spaces constructed in each phase should be clearly documented.

We also recommend the following commitments for any development at Wilderness Crossing:

Safety along the Route 3 corridor is of the utmost importance. The crash data history was documented in the traffic study; however, pedestrian and bicycle facilities were not considered as part of the development plan. A development of this magnitude has the responsibility to consider safe infrastructure for alternative, non-motorized modes of transportation. Please consider a multi-use path to be constructed along Route 3 for the entirety of the site and connecting to nearby key destinations, including the Wilderness Battlefield.

Transportation Demand Management (TDM) is a set of strategies with the primary goal of minimizing the use of personal automobiles. The development did not list any TDM strategies related to parking, walking and/or bicycling, transit-use, carpooling, or vehicle sharing, electric



vehicles, or bike share systems. Please consider adding a robust set of TDM strategies to reduce the use of personal automobiles and increase the use of alternative modes of transportation.

The Institute of Transportation Engineers (ITE) Trip Generation manual was used to estimate the trips for the proposed development. Those trips were then adjusted (in this case by internal capture rates and pass-by rates) to make a “best guess” assumption of the traffic. We recommend a formal traffic monitoring program be conducted within six-months after 90% occupancy of each phase of development to make sure that the traffic projections are consistent with the actual traffic levels observed. Any proposed road improvement mitigation at nearby intersections should be studied to confirm the intersections are functioning properly.

### **Additional Comments and Concerns**

It is recommended that Orange County work with FRSP and VDOT to make sure the above requests are completed to VDOT standards, before issuing any decision on the project.

According to the traffic study, VDOT has proposed several significant changes to the Route 3 corridor specifically at the intersection of Route 3 at Route 20. FRSP has indicated concern regarding the level of engagement that has been conducted along the corridor with respect to planning and development. FRSP is a major stakeholder along the corridor and expects to play a role in the next steps. In fact, the VA Route 3 Arterial Preservation Plan, in the long-term recommendation at Route 3 with Route 20 section states “that Route 20 be realigned approximately one half-mile west and the existing Route 20 turned into a cul-de-sac to eliminate the intersection with Route 3. A Diverging Diamond Interchange (DDI) should be constructed as part of that realignment. This configuration will require coordination with the National Park Service and additional study to meet National Environmental Policy Act (NEPA) requirements.” After review of the traffic study, the development has proposed to forgo the short-term solution from the CGT intersection. FRSP and VDOT should be involved in any short-term and long-term planning efforts at the intersection.

In addition, the traffic study states, “the roadway improvements recommended for Phase 1 and Phase 2 fully mitigate the traffic impacts of the Wilderness Crossing development on study intersections along Route 3 and Route 20 through 2031.” We have concerns with this statement as many of the proposed “road improvements” to address increased traffic at the Route 3 and 20 intersection are scheduled for 10, 20 and 30 years in the future. How will those proposed “improvements” be funded? Will they be funded by the County, VDOT, or will the developer have to establish a bond to fund all the future components of the proposed development (Phase 1 and 2)? This is crucial question that needs to be answered early in the process, so all stakeholders are aware of this issue.

---

# WILDERNESS BATTLEFIELD COALITION

---

April 27, 2022

Orange County Board of Supervisors  
P.O. Box 111  
112 W. Main Street,  
Orange, VA 22960

Re: Wilderness Crossing Development Proposal

Dear Supervisors:

I am writing on behalf of the Wilderness Battlefield Coalition to follow up on our letter of October 1, 2021 (attached), which laid out our concerns with the proposed Wilderness Crossing development adjacent to the historic Wilderness Battlefield.<sup>1</sup>

As discussed in our previous letter, our organizations have previously partnered with Orange County officials and local residents to develop the Wilderness Battlefield Gateway Study. This study was a holistic approach to analyzing how the Germanna Wilderness Area (GWA) could be preserved and developed responsibly. At the time, the county incorporated many of the recommendations from that study into the Germanna Wilderness Area Plan (GWAP).

The Wilderness Battlefield Coalition, having tracked the initial proposal of the Wilderness Crossing development and subsequent changes to that proposal, feels that the development would undercut key recommendations from the Wilderness gateway Study and GWAP, including:

- The desire to create a connected community with a careful balance between developed areas and open space
- Traffic improvements that would minimize impacts in the region
- Commitment to preserving historic sites

Further, Wilderness Crossing would distinctly impact one of the most historically significant battlefields in the nation, the Wilderness Battlefield. In 1993, the Congressionally authorized Civil War Sites Advisory Commission (CWSAC) classified the Wilderness Battlefield as a Priority I, Class A site – the Commission's highest designation.

Historic mining on the site and the adjacency of a mercury impaired section of the Rapidan River both present distinct environmental challenges which we feel have not been adequately addressed. Between existing water quality concerns and the unknowns of disturbing land with a high concentration of possibly toxic gold mining sites, we believe more analysis by the county and state is called for before approval.

We are also concerned with the sizable increase in traffic that this development would inevitably put onto the roads of Orange County. The intersection of Route 3 and Route 20 is already overburdened from current traffic levels. The owner of the proposed development has suggested that a realignment of that

---

<sup>1</sup> Central Virginia Battlefields Trust, Friends of Wilderness Battlefield, Preservation Virginia, Piedmont Environmental Council, American Battlefield Trust, National Parks Conservation Association, and National Trust for Historic Preservation.



**Letter from the Wilderness Battlefield Coalition (continued)**

Page 2 of 2

April 27, 2022

intersection could utilize his own land. The Wilderness Battlefield Gateway Study found that a realignment of the intersection to the proposed area would not be feasible due to cost and encroachment on historic resources.

Our organizations recognize that a balance must be struck between preservation and economic development in the region. However, we feel that as this development is currently proposed it undercuts key consensus elements of the Germanna Wilderness Area Plan and the Wilderness Battlefield Gateway Study. We request that this matter be opened to community feedback through a public forum with the Board of Supervisors.

Finally, we would like to request the opportunity to meet with representatives of the Board of Supervisors and the County Planning Commission to discuss our concerns and the ways in which we believe this proposal could be adjusted to better align with the 2012 Wilderness Battlefield Gateway Study and the 2015 GWAP, and balance the county's economic development goals with preservation. You can contact Max Hokit of the American Battlefield Trust at [mhokit@battlefields.org](mailto:mhokit@battlefields.org) to plan such a discussion.

Thank you for your consideration.

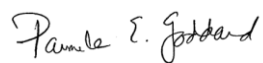
Sincerely,



Jim Campi  
American Battlefield Trust




Dan Holmes  
Piedmont Environmental Council



Pamela Goddard  
National Parks Conservation Association



Mark Leach  
Friends of Wilderness Battlefield



Tom Van Winkle  
Central Virginia Battlefields Trust



Rob Nieweg  
National Trust for Historic Preservation



Elizabeth Kostelny  
Preservation Virginia