

Evelyn Tidlow

From: Ann M Rogers <amelvin3@verizon.net>

Sent: Saturday, June 01, 2019 12:19 AM

To: Paul Friedman; Pulice Michael (DHR); roger.kirchen@dhr.virginia.gov; Sonja Ingram; Richard Caywood; Alison Blanton; Grace Terry; Evelyn Tidlow; Megan Neylon; Mark E. Barker; mary_c_krueger@nps.gov; Ashley Webb; Anita Puckett; Bert Bondurant; Louis Zeller; Frank Terry; Coles Terry; Mike Reynolds

Subject: Comments on NRHP nomination for the Coles-Terry Rural Historic District

Attachments: 021.JPG; 002.JPG; Photo- Holston High Knob Tower, from Blue Ridge Fire Towers.pdf; Comments to FERC re NRHP nomination of CTRHD 5-31-19.pdf

EXTERNAL E-MAIL MESSAGE

Mr. Friedman,

Please see my comments on the NRHP nomination for the Coles-Terry Rural Historic District, attached.

Thank you,

Ann Rogers

Section 106 Coordinator

Blue Ridge Environmental Defense League

540-312-3104

May 31, 2019

Mr. Paul Friedman
Federal Energy Regulatory
Commission 888 First Street NE, Room
1A Washington, DC 20426

Dear Mr. Friedman,

I am writing in response to the Draft National Register of Historic Places Nomination for the Coles- Terry Rural Historic District (080-5689), a copy of which was shipped to me on May 1 by Megan Neylon, Environmental Permitting Supervisor, Mountain Valley Pipeline.

In this letter, I: (1) review the failure of the Draft National Register of Historic Places Nomination for the Coles-Terry Rural Historic District (“the Nomination”) to designate all National Register Criteria that apply to the Coles-Terry Rural Historic District (“CTRHD”); (2) review the Nomination's changes to the district's boundaries from those appropriately defined in the Preliminary Information Form (“PIF”) for the CTRHD and approved by Virginia Department of Historic Resources (“VDHR”) in 2016; and (3) request that FERC require amendments to the Nomination.

FAILURE TO DESIGNATE ALL APPLICABLE NATIONAL REGISTER CRITERIA

Nomination's exclusive focus on Criterion A

On page 13, under “Statement of Significance”, the Draft National Register of Historic Places Nomination for the Coles-Terry Rural Historic District (“Nomination”) designates that the CTRHD is qualified for National Register listing under Criterion A as a property “associated with events that have made a significant contribution to the broad patterns of our history”. On page 14, the Nomination designates “agriculture” as the area of significance in which the District is eligible under Criterion A.

There are no other National Register criteria listed besides Criterion A, and no other areas of significance listed besides “Agriculture”.

The Nomination's treatment of the National Register criteria applicable to the CTRHD should also include Criteria C and D, as discussed below.

Rationale for use of Criterion C

As stated on page 13 of the Nomination, Criterion C indicates that a property “embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.”

The PIF for the CTRHD that was approved by VDHR in 2016 indicates that the district is eligible under both Criteria A and C. The inclusion of Criterion C as applicable to the CTRHD is necessary because, although rural, the CTRHD contains (1) architecture that possesses high artistic value, and (2) a fire tower that embodies a type, period or method of construction.

Aunt Grace's house = High artistic style

The structure inside the CTRHD that embodies “high artistic style” is DHR 080-5679. The name assigned to this structure in the Nomination is “Grace Terry Moncure Farm”. The name assigned to it in

the PIF is “Aunt Grace Fortesque’s house aka Terry Moncure Place”. High artistic style is in evidence in the interior of this building. Without access to the interior, it has been impossible for the authors of the Nomination to develop an awareness of the distinctive artistic merit of this building. Without consideration of the interior of Aunt Grace's house, the Nomination's treatment cannot be considered complete and/or adequate.

Fire tower = Type, period, and method of construction

The Nomination lists the Terry fire tower as “non-contributing” because it does not possess any significance in the area of Architecture, which is the only area of significance being considered in the Nomination. In contrast, the PIF lists the tower as a contributing resource.

Below I discuss why the nomination should be amended to include the tower as a contributing resource, significant under Criterion C.

In the process of working with VDHR to write the PIF for the CTRHD, I discovered much in the way of useful documentation on the fire towers built by the Civilian Conservation Corps. One of the most instructive of these is Robert Sorrell's Blue Ridge Fire Towers (The History Press, 2015). Blue Ridge Fire Towers includes photos of fire towers in the Blue Ridge Mountain region having the same distinctive "type, period, and method of construction" as the Terry fire tower, consisting of the same weight and configuration of steel beams and the same overall geometric design.

Please see a photo of the Terry fire tower, attached.

Please see also the attached photocopy of page 72 of Blue Ridge Fire Towers, which contains a photo of the Holston High Knob Tower. The Holston tower offers a striking example of the "type, period, and method of construction" that we see in the Terry fire tower.

A comparison of the photos of the two towers makes evident a shared construction technique in which the steel beams used to build the towers are arranged in layered equilateral triangles, with the triangles at ground level having the longest sides and those at the top, the shortest. Both towers have four vertical beams extending from the ground to a platform at the top, on which a cabin was built, and in both towers, the vertical beams are joined and anchored by the layered triangles. Both towers are all wider at the bottom than at the top, forming an elongated, 4-sided pyramidal shape.

As distinct from the Holston High Knob Tower, the Terry tower contains, in addition to the layered triangles, at least two layers at the top in which the steel beams are arranged in stacked “X” shapes, which is a tower design feature documented in "Lookout Towers Documentation and National Register of Historic Places Evaluation" prepared for USDA Forest Service, Eastern Administrative Zone, Asheville, NC, by Edwards-Pitman Environmental, Inc., Durham, NC, 2005.

The Terry tower and the Holston High Knob Tower are both constructed of steel beams that are heavy enough to support the weight of a cabin at the top in which people lived and worked. The weight of these steel beams gives the Terry and Holston towers a substantial appearance that is very distinctive from that of the communication towers built to facilitate telephone service starting in the 1950s, which appear aerial and lightweight in comparison with the fire towers.

The Terry fire tower adds much to the historic significance of the Coles-Terry Rural Historic District, especially considering Grace Fortescue Terry's inclusion of a description of the tower in her 1957 narrative, "Bent Mountain":

The serried west wall of the plateau was "entered" by one of General Lewis's officers, Major Poore, and bears his name today. This wall, following ridges, rises to its highest point of 3900

feet on the rim of Montgomery County, named for the "entry" of a man named Street, and so called now, in 1957. This high point is now the site of a fire observation tower, equipped with radar. A road leads down through Montgomery County into the valley to Elliston -- named for the Ellis family, whose lands followed the river and adjoined those of other landowners, among these the Edmondsons of picturesque Fotheringay, where Louis Phillips was a guest during his wanderings as an exile from France. Viewed from Street's Entry, the expanse is vast, from the valleys, threaded by flashes of Roanoke River flowing toward Salem and Roanoke to the vistas westward of ranges and ranges, deep indigo into paler edges of distant peaks, until outlines vanish in the veil of dim horizons. (Grace Fortescue Terry. Bent Mountain. 1957. Virginia Room, Roanoke City Public Library, Roanoke, Va.)

Finally, the Terry tower is more than a tower, it is the center of a network of historic fire roads and trails built by the Civilian Conservation Corps, many of which are still used for hiking and horseback riding. The main trail from Honeysuckle Rd. to the Terry tower is of a very unusual design, consisting of two parallel cobblestone tire paths (please see photo, attached), which remain flawlessly intact after decades of exposure to high mountain weather extremes.

Blue Ridge Fire Towers offers this description of the CCC fire roads: "During the 1930s, the CCC constructed hundreds of thousands of miles of trails and roads, many of which provided access to the fire towers. Most roads were narrow dirt and gravel paths that led up the sides of the mountains to the towers. The CCC would use a variety of tools to build the roads, including horse-powered equipment and heavy machinery. The roads were built so lookouts could travel to the tower by four-wheel-drive vehicles, hence the name of the old jeep roads. They weren't necessarily constructed for family excursions, although some roads allowed visitors to access the mountains. In many locations, such as Yellow Mountain in North Carolina, the CCC also blazed trails and footpaths to the towers. Most mountain roads and trails followed stream beds or former Native American and pioneer paths."

Thus we see that the network of fire roads and paths adjoining the Terry fire tower forms a historic landscape feature that is endemic to lands on which fire towers were built during the CCC era.

The Nomination should be amended to include the Terry fire tower and its associated fire roads and trails as a contributing resource in the CTRHD, based on the tower's distinctive design and landscape features that are shared by many other fire towers built by the Civilian Conservation Corps during the same era.

Rationale for use of Criterion D

Although the PIF does not list Criterion D as being applicable to the CTRHD, I suggest it here in light of the district's potential for significance in the area of Native American archaeology. The addition of Criterion D is supported by (a) a statement in the PIF, (b) statements made during the September 15, 2016 meeting of the Virginia State Review Board in which the CTRHD was approved, and (c) the presence of significant Native American archaeological sites on property that is contiguous to, but not included in the CTRHD.

The PIF states that Aunt Grace Fortescue's property contains "un-delineated Archaic and Woodland period archaeological sites", and that there is an "extensive collection of lithics in the owner's possession". During the Virginia State Review Board's review of the CTRHD on September 15, 2016,

the Board's Chair, Elizabeth Moore, inquired about the historic district's potential for archaeological significance. Mike Pulice, the VDHR staff person presenting the PIF for eligibility determination,

replied that archaeological sites have been identified but not investigated sufficiently to establish significance. Archaeological sites 44RN0400, 44RN0401, and 44RN0408 were all found eligible for listing on the National Register during the Section 106 review for the Mountain Valley Pipeline during 2016-18. These sites, which were subjected to a Phase II archaeological dig that lasted several weeks, are located on property less than a mile from the southern boundary of the CTRHD. The proximity of three National Register eligible archaeological sites within hiking distance of the CTRHD suggests that the district has potential for archaeological significance.

PROBLEMS WITH NOMINATION'S DEFINITION OF DISTRICT BOUNDARIES

The first problem with the Nomination's treatment of boundaries for the CTRHD stems from the unsubstantiated decision to expand the eastern boundary of the district to include a significant number of suburban homes built within the last 50 years. The district's boundaries as they appear in the PIF are the product of weeks of painstaking on-the-ground surveys performed in an effort to exclude non-contributing suburban homes that have been built in many parts of the Bent Mountain community over the past 50 years.

Areas where the Nomination's boundaries include non-contributing suburban housing include:

- the area along Poor Mountain Road between its intersections with Tinsley Lane and Willett Lane; the Nomination's version of the boundaries includes many properties on the west side of Poor Mountain Road that have no relationship to the historic context of the district and are non-contributing
- the southern half of Willett Lane, which contains nothing of historic significance and much in the way of non-contributing suburban housing.

The second problem with the Nomination's boundaries is its inclusion of Laurel Creek Road and Cove Hollow Road in Montgomery County. The Coles and Terry property holdings that form the historic basis of the CTRHD have historic and family roots in Roanoke County, as evidenced by the title of Grace Fortescue Terry's 1957 narrative, "Bent Mountain", which is inside Roanoke County.

The Nomination's expansion of the western boundary to include approximately 2 square miles of land inside Montgomery County weakens the district's connection to the documented history of the people whose names it bears.

The CTRHD boundaries appearing in the PIF are the result of a mathematical analysis of an 1848 plat showing Coles and Terry land holdings. The boundaries of the properties appearing on that plat were analyzed mathematically in terms of their distance from a fixed geographic point that is recognizable today, and then superimposed on a contemporary topographic map. Preliminary district boundaries were defined on the basis of the resulting geometric shape, and those boundaries then adjusted to avoid suburban housing and other non-contributing resources.

I would be happy to share this analysis with the authors of the Nomination, upon request.

REQUEST TO FERC

In summary, I request that FERC require that the following changes be made to the Nomination:

- addition of Criterion C
- addition of Criterion D
- addition of the Terry fire tower and associated fire roads and trails as a contributing resource

- reconfiguration of boundaries along Poor Mountain Road and Willett Lane to exclude areas of suburban housing and other non-contributing resources
- exclusion of areas in Montgomery County, which are outside the district's historic context.

Thank you,

Ann

Rogers

Section 106 Coordinator

Blue Ridge Environmental Defense

League 540-312-3104

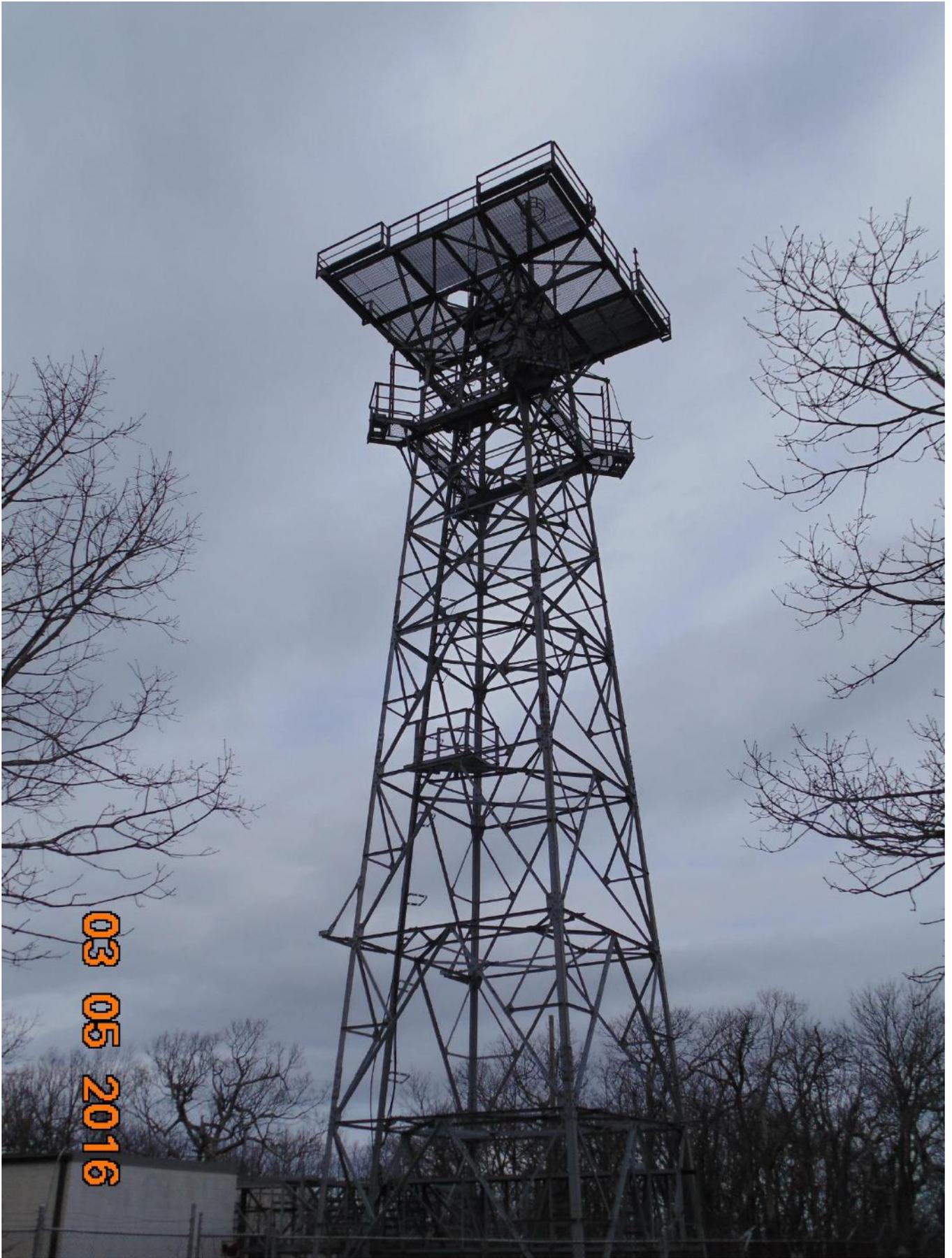
BLUE RIDGE FIRE TOWERS



The Holston High Knob Tower was originally built for the flatlands of Mississippi. It was moved to the Blue Ridge of Tennessee in the 1940s. *Photo by Robert Sorrell.*

From atop the tower, Ellis said that on a nice clear day he could see Cumberland Gap at the Tennessee, Kentucky and Virginia border. The tower on Holston Mountain is taller than most Appalachian lookouts. In fact, while Holston's tower is an imposing one-hundred-foot-tall lookout, most others in the region are less than half its size.





03 05 2016