

National Park Service
U.S. Department of the Interior



Manassas National Battlefield Park
Manassas, Virginia

General Management Plan

Record of Decision

Approved:

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1-25-11

UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

RECORD OF DECISION

GENERAL MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT

Manassas National Battlefield Park

Virginia

The Department of the Interior, National Park Service (NPS), has prepared this Record of Decision for the *Manassas National Battlefield Park General Management Plan/Environmental Impact Statement*. This Record of Decision includes a description of the background of the project, a statement of the decision made, synopses of other alternatives considered, the basis for the decision, findings on impairment of park resources and values, a description of the environmentally preferable alternative, a listing of measures to minimize environmental harm, and an overview of public and agency involvement in the decision-making process.

BACKGROUND OF THE PROJECT

The purpose of the general management plan is to provide comprehensive guidance for decision making at the national battlefield for the next 15 to 20 years. The guidance will serve as the framework for resource preservation and management, visitor use and experience, and park operations. The plan describes the desired natural and cultural resource conditions and visitor experiences that are to be achieved and maintained in the park over time. Servicewide law and policy, the park's purpose and significance, and special mandates contributed to the development of the guidance that will direct the long-term management of the park.

The *Manassas National Battlefield Park General Management Plan/Environmental Impact Statement* will update planning documents that govern management of the park, specifically the general management plan of 1983. In particular, this *General Management Plan/Environmental Impact Statement* addresses congressional direction from the Manassas National Battlefield Park Amendments of 1988 (PL 100-46) that incorporated additional lands relevant to the Second Battle of Manassas into the park. This plan also provides management guidance to address changes in visitor use patterns in the park, and population and municipal growth within the region. These changes impact park resources, interpretation of the two battles, visitor experience and safety, park operations, and employee safety within the park.

The Manassas National Battlefield Park Amendments of 1988 were enacted to preserve the most important historic properties related to the

Battle of Second Manassas. In the legislation, Congress also expressed the concern that highway expansion and the resulting increased traffic on U.S. Route 29 and VA Route 234 could pose too great an impact on the natural and cultural resources of Manassas National Battlefield Park and that alternative routes for traffic should be studied.

Specifically, Congress directed that the "Secretary of the Interior...in consultation and consensus with the Commonwealth of Virginia, the Federal Highway Administration, and Prince William County, shall conduct a study regarding the relocation of highways (known as routes 29 and 234) in, and in the vicinity of, the Manassas National Battlefield Park. . . . The study shall specifically consider and develop plans for the closing of these public highways (known as routes 29 and 234) that transect the park and shall include analysis of the timing and method of such closures and of means to provide alternative routes for traffic now transecting the park." The Manassas National Battlefield Park Bypass Study was completed in 2005. The study confirmed the concerns of Congress and identified a preferred bypass route.

DECISION (SELECTED ALTERNATIVE)

Three approaches to achieving the desired conditions in the park were developed: Alternative A, Continuing Current Management Approaches (No Action); Alternative B, the Two Battles of Manassas - A Comprehensive Understanding of Each Battle; and Alternative C, The Defining Moments of the Battles of Manassas - An Understanding of the Principal Events.

Alternative B is the National Park Service selected alternative. Under this alternative, the park would focus on interpreting the two battles of Manassas as distinct military events. This alternative has been modified from the alternative B presented in the final *General Management Plan/Environmental Statement* as discussed below. The initial stop in the park will be a new visitor center; where visitors will receive their first orientation to the battlefield. The interpretive information will focus on putting the two battles into context. Visitors will receive a more thorough orientation to each battle from two visitor contact areas—Henry Hill for First Manassas and Brawner Farm for Second Manassas. From these access points, visitors may explore the many historic sites associated with each event throughout the park. The experience for each battle will be distinct, with stand-alone visitor areas and automobile tour routes. Separate, chronological automobile and bicycle tours will be developed for each battle. In this alternative, the rehabilitation of the historic landscape will be critical to visitor understanding of the events and military tactics associated with each battle. Development of a visitor center near Stone Bridge was discussed as part of alternative C in the final *General Management Plan/Environmental Impact Statement*. By including it in the selected alternative, the National Park Service believes the park can provide a more comprehensive approach to interpretation of both battles that would enhance the visitor experience. It should be noted that while

Alternative C places the visitor center near Stone Bridge, future planning and compliance may determine a more appropriate location for such a facility. The new visitor center would provide context for the two battles; the visitor contact station at Henry Hill and at Brawner Farm would focus on First Manassas and Second Manassas respectively. Currently the Henry Hill visitor center focuses solely on First Manassas. Given its location within the cultural landscape and space limitations, expanding the interpretive focus at Henry Hill is not feasible. By constructing a new visitor center the park can more effectively achieve the management goals of the park. Because the impacts associated with development of the visitor center were included in the final *General Management Plan/Environmental Impact Statement*, no additional analysis is required as a result of including it in the selected alternative. However, site specific analysis, compliance with NEPA and Section 106 of the National Historic Preservation Act, would be conducted as appropriate before development of the new visitor center. As part of this planning effort, due to the sensitive nature of the cultural landscape and resources in the park, the NPS would explore a range of alternatives regarding the potential site of the new facility (both inside and outside of the park boundaries), and would seek sites that minimize impacts to park resources especially those resources related to the two battles. In addition, the NPS will consider the operational needs of the park and how a new visitor center could meet those needs more efficiently (i.e., office space, interpretation, cooperative agreements, curatorial requirements, and utilization of the current visitor facilities within the park); potentially allowing for a reduction in the size of the current visitor facilities within the Park in the future.

Full implementation of this alternative assumes the completion of the Manassas National Battlefield Park Bypass (Bypass). The Bypass will permit the removal of heavy commuter and commercial truck traffic from the portions of U.S. Route 29 and VA Route 234 that run through the park. Through traffic will be further limited with the addition of controlled access points. Visitors will experience a battlefield landscape that resembles its wartime appearance. Key interpretive views will be preserved and re-created to help visitors understand how the battles unfolded and the importance of certain locations. Wartime structures will be preserved and other historic structures will be retained to mark the site of wartime buildings.

Key Actions

Under the selected alternative, the following actions will occur: Separate automobile and bike paths will be developed for each battle. The National Park Service will upgrade current trails and interpretive media along the First Manassas and Second Manassas hiking trails as necessary. New portions of the Second Manassas hiking trail will be created as necessary. Because of safety concerns posed by the high traffic volumes on U.S. Route 29 and VA Route 234, separate automobile and bicycle tour routes will not be implemented until the completion of the Bypass. Once the Bypass is completed, through traffic will be

limited in the park with the addition of controlled access facilities at the park's four main entry points.

A new visitor center will be constructed, designed as the initial stop and primary orientation point for the park.

The visitor contact station at Henry Hill will focus entirely on First Manassas.

The Second Manassas visitor contact station will be located at Brawner Farm. The site will be open for year-round visitation once necessary improvements have been completed.

The cultural landscape will reflect conditions in 1861-1862 in several key areas of the park through a combination of tree removal, clearing, and reforestation. The cleared areas will be managed as grassland communities (or in a few instances as shrub communities) that will provide desirable habitat and restore historic vistas for visitors. Maintaining the historic appearance of some of these areas with a lawnmower or other machinery may be prohibited because of terrain. In those cases, following appropriate compliance, other approved methods would be utilized to maintain the landscape. Prescribed fire may be considered as a potential management tool; however, this would require an extensive compliance to ensure that it could be safely used and would have expected results. The park staff will continue to work cooperatively with neighboring jurisdictions related to rehabilitation of the historic scene. In addition, plans detailing how the various landscapes will be managed will be developed prior to the implementation of any rehabilitation activities. The following rehabilitation activities have been identified; the highest priority tasks are listed first:

- Approximately 45 acres of woods along the west side of Chinn Ridge will be cleared and replaced with open fields and grasslands to reestablish the view between the ridge and the site of the New York Monuments.
- Approximately 35 acres of trees will be removed from Matthews Hill and the open fields rehabilitated.
- Trees will be thinned at the top of the slope along the east side of the Chinn Ridge to reestablish the view between Chinn Ridge and Henry Hill while minimizing the amount of vegetation removed. The riparian buffer along Chinn Branch will be retained.
- Approximately 15 acres of land on Stuart's Hill that is currently open space will be reforested.
- Approximately 20 acres of land that is currently open space south of Stuart's Hill will be reforested.
- Approximately 20 acres along the north-central portion of Dogan Ridge will be reforested, and a small area of 3 acres along the curve of the Sudley-Manassas Road will be cleared and managed as open fields.

- To the north of the Matthews Hill area, an area of approximately 25 acres will be reforested.
- An additional 5 acres of land along Bull Run to the west of Poplar Ford will be reforested.
- The current Stuart's Hill clearing will be expanded by approximately 30 acres to the east. The clearing will restore the view from General Lee's headquarters toward Centreville during Second Manassas.
- The historic landscape around the Cundiff House will be rehabilitated to wartime conditions. Approximately 40 acres of trees will be removed and converted to grassland and/or scrubland.

The National Park Service will continue to preserve historic structures and features, including those that date from the battles, such as Stone House, L. Dogan House, Thornberry House, and the Unfinished Railroad. Buildings and structures that do not date from the battles, but are historic or mark the site of wartime structures, will be stabilized and rehabilitated to function as important interpretive sites or will be maintained for park uses. These structures include the Brawner Farm House, Henry House, J. Dogan House, Pringle House, and Stone Bridge.

In addition to continuing to protect these structures, the National Park Service will initiate several actions:

- Complete work necessary to support year round visitation of the Brawner Farm House as part of the Second Manassas tour route.
- Explore a range of options to support interpretation of the Robinson House ruins from the Civil War period.
- Preserve and stabilize the J. Dogan House. This preservation effort will include removing nonconforming structural elements such as siding, and removing the nonconforming modern garage.
- As part of the Bypass, the existing U.S. Route 29 bridge over Bull Run will be removed to eliminate modern intrusions from the battlefield landscape and to return the site to a more historic appearance. In addition, a new bridge will be constructed to allow continued access along U.S. Route 29. The new location will be chosen so there will be fewer impacts to the cultural landscape.

Implementation of each of these specific actions will require additional site specific planning and compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the National Environmental Policy Act (NEPA) of 1969, as amended.

Boundary Expansion

In the selected alternative, a boundary adjustment to the park will be necessary to include the four tracts of land described below. This

adjustment will require congressional action to amend the existing boundary.

The Davis Tract is a 136-acre parcel of land west of Featherbed Lane across from the northwestern edge of the current park boundary. This parcel was recently acquired by the Civil War Preservation Trust and a group of local residents. The land is important to the Battle of Second Manassas as a site where General Thomas J. "Stonewall" Jackson maneuvered and withstood repeated assaults. Thus, it is especially important to the story at Manassas National Battlefield Park.

The Stonewall Memory Garden Tract is a 43-acre parcel located in the northern half of the Stonewall Memory Garden and north of the L. Dogan House on the west side of Featherbed Lane. The parcel is not part of cemetery operations. This property is, without question, the most important property currently outside the park boundaries. On this site, Union General Fitz-John Porter led an assault on Jackson's line along the Unfinished Railroad on the last day of Second Manassas (August 30, 1862). A sliver of land that was part of that assault is currently within the park boundary. The additional 43 acres will include all land associated with that part of the battle and will allow full interpretation of the story.

The Conservation Trust Parcel is a 24.25-acre tract of land purchased by the Conservation Trust in 1991 and located almost entirely within the park boundary. The Conservation Trust transferred that land to the National Park Service, but a small piece (0.75 acre) east of Pageland Lane, was outside the park boundary. Since that time, the Conservation Trust has transferred the land to the Civil War Preservation Trust, which has expressed interest in donating the land to the park.

Dunklin Monument is a 6-acre parcel of land near the park headquarters south of Route 29 and on the west side of Pageland Lane. The family of a Texas Confederate soldier, Timothy Dunklin, who was killed at Second Manassas, erected the monument. Dunklin is believed to be buried under the monument, and some accounts indicate that other Confederate soldiers are buried nearby. The Dunklin Monument tract is part of an estate called the Latsios Trust. The family owns some 177 acres in two adjoining parcels and has expressed a strong interest in developing the land as an office/high technology complex. Several years ago, the Virginia Department of Transportation purchased a right-of-way through the property, just to the west of the monument, which left the monument intact along with about 6 acres.

Mitigative Measures/Best Management Practices

To ensure that implementation of the selected alternative protects natural and cultural resources and the quality of the visitor experience, a consistent set of mitigative measures will be applied to actions described in the selected alternative. Prior to implementation of actions in the selected alternative, site-specific analysis and planning will be completed. Additional environmental analysis and

documentation will be completed as necessary to comply with the NEPA, NHPA, U.S. Army Corps of Engineers Section 404 permits, and other key regulations. As part of the environmental review, the National Park Service will seek to avoid, minimize, and mitigate adverse impacts where practicable. Examples of actions where additional analysis would be needed could include, but would not be limited to, the U.S. Route 29 bridge removal and reconstruction in a different location, landscape scene rehabilitation, and other projects that may require land disturbance.

During implementation, the following mitigative measures and best management practices will be applied to avoid or minimize potential adverse impacts from the selected alternative.

Natural Resources

- For construction or scene rehabilitation, the National Park Service will use appropriate sediment and erosion control measures, minimize discharge to water bodies, regularly inspect construction equipment for leaks of petroleum and other chemicals, provide for dust control, provide for the addition of pollution control devices on construction equipment, and provide for the use of low-polluting fuels.
- Where ground disturbance is anticipated, best management practices to control soil erosion and loss during construction activities will include minimization of disturbance areas, use of silt fences, revegetation, or other applicable practices to control drainage and erosion in accordance with an approved sediment and erosion control plan.
- Riparian buffers will be maintained along all streams to mitigate potential bank erosion and channel siltation from areas where forest cover will be removed. Forest removal operations will incorporate Virginia Department of Forestry best management practices to avoid erosion problems, particularly where disturbance would occur on slopes. Riparian buffers will be maintained as wooded buffers or shrub and grass buffers, depending on the significance of the historic views to be restored at specific sites within the park.
- Installation of pollution control devices on maintenance equipment and the use of low polluting fuels will be required.

Cultural Resources

To avoid adverse impacts to cultural resources, the *Secretary of the Interior's Standards* will guide management actions. In addition, screening and/or sensitive design that is compatible with historic resources will be used as appropriate. If adverse impacts cannot be avoided, the National Park Service will mitigate these impacts through a consultation process with all interested parties. Other mitigative measures include the following:

- Archeological surveys and/or monitoring would precede any ground disturbing activities, as appropriate. To the greatest extent possible, known archeological resources would be avoided, and new facilities would be located in previously disturbed areas. If archeological resources listed in or eligible for listing in the National Register of Historic Places could not be avoided, an appropriate mitigation strategy would be developed in consultation with the Virginia Department of Historic Resources (the state historic preservation office).
- If previously undiscovered archeological resources are uncovered during construction, all work in the immediate vicinity of the discovery will be halted until the resources can be identified and documented, and an appropriate mitigation strategy can be developed in consultation with the state historic preservation office.
- In the event that Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act of 1990 (25 *United States Code* 3001) will be followed. Other human remains will be treated in accordance with the Department of the Interior's guidelines on human remains.
- Best management practices will be used to rehabilitate the battlefield and cultural landscape to the greatest extent feasible. This process will entail the rehabilitation of important historic viewsheds through thinning and clearing of selected wooded areas, rehabilitation of historic forested areas through natural succession, and rehabilitation of agricultural fields. Noncontributing and incompatible structures would be removed and any new structures would be designed to be compatible with the landscape. Areas considered for cultural landscape rehabilitation are described under key actions in the selected alternative.

Socioeconomic Environment

If site-specific actions in the selected alternative have the potential to impact the social setting, economy, or other aspects of the socioeconomic environment, the National Park Service will complete site-specific planning and compliance prior to implementation of these actions. Examples of actions where additional analysis will be needed would include, but not be limited to, implementation of controlled access into the park.

Visitor Experience

The air quality nonattainment for ozone standards might offer exploratory partnering and/or funding opportunities with neighboring jurisdictions to lessen nearby vehicular traffic. This might reduce the noise and, thus, improve the park's soundscape for visitors.

OTHER ALTERNATIVES CONSIDERED

Alternative A - Continuing Current Management Approaches (No Action), represents a continuation of current management direction and trends at Manassas National Battlefield Park, and serves as a baseline for comparing the resource conditions and visitor experiences prescribed by the two action alternatives. Under this alternative, existing conditions, trends, and management practices would be maintained with only minor changes. Managers would continue to follow special mandates and servicewide laws and policies. The current, most recognizable features in the park would continue to serve as the primary focus for visitor use and interpretation. Orientation and visitor services related to both battles would continue to be offered at the Henry Hill visitor center.

Under this alternative, historical park uses and development patterns would continue in accordance with the 1983 general management plan. The main roads within the park (U.S. Route 29 and VA Route 234) would remain open to commuter and truck traffic. Current facilities at the park would be maintained, upgraded, and rehabilitated as needed. Some changes would be made to visitor use patterns to improve access to those lands added to the park since the 1983 general management plan was completed, including the Brawner Farm and Stuart's Hill tracts.

Alternative C-The Defining Moments of the Battles of Manassas - An Understanding of the Principal Events would focus on the "watershed" events of the battles, encouraging visitors toward one major visitor center and multiple key interpretive sites. Interpretation of these general events, the outcomes of the battles, and the broader story of the Civil War would be emphasized over the detailed military tactics of each battle. Although other sites in the park would be accessible, the concentration of interpretation and visitor use would be in areas that illustrate the "defining" moments of the battles. Rehabilitating the historic scene in some of these areas would help visitors understand these principal events.

In alternative C, the overall reasons and strategy for the Civil War would be presented in a comprehensive way. The importance of the battles of Manassas would be presented in the overall context of the Civil War. Other stories, such as those of the local families and African Americans who were affected by the battles of Manassas, could be interpreted in the park. The general stories and outcomes of the battles would also be presented. The existing Henry Hill visitor center would be removed, and orientation and visitor services for both battles would be carried out from a new visitor center near Stone Bridge. The visitor experience would not be highly structured and key interpretive areas could be visited without regard to order or sequence. Visitors could tailor their visit to those elements of the battles in which they were most interested.

Key interpretive areas would explain the battle events. In these areas, historic structures would serve interpretive functions and would be accessible to visitors. Extensive interpretive displays would explain the battle events and view corridors would be developed to

enhance visitor understanding of the "watershed" battle events. Overall visitor experience and safety would be enhanced by the construction of the Bypass. This road would eliminate heavy commuter and commercial truck traffic through the park (on U.S. Route 29 and VA Route 234). Through traffic would be further limited with the addition of controlled access points.

BASIS FOR DECISION

The selected alternative was chosen by the National Park Service because it provides the greatest consistency with both congressional intent and the purpose of the park. The purpose statement for the park is the standard against which all decisions and actions are tested. The purpose statement is based on the park's enabling legislation, legislative history, and National Park Service policies.

Manassas National Battlefield Park was established in 1940 to preserve the scene of two major Civil War battles. Located a few miles north of the prized railroad junction of Manassas, Virginia, this peaceful slice of the Virginia countryside was the site of the first civil war battle in 1861, followed a year later by another clash between the armies of the North and South. To support the preservation and interpretation of scenes from these two battles, the boundaries of the national battlefield have been expanded by Congress in 1954, 1980, and 1988. Taken together, the legislation establishes the purpose of the park as follows:

"Manassas National Battlefield Park was established to preserve the historic landscape containing historic sites, buildings, objects, and views that contribute to the national significance of the Battles of First and Second Manassas, for the use, inspiration, and benefit of the public." (*Manassas National Battlefield Park General Management Plan/Environmental Statement*, p. 8)

The Bypass Study, completed in 2005, recommends development of alternatives routes for traffic on Routes 29 and 234. All alternatives are consistent with the purpose of the park, but only the selected alternative and alternative C are consistent with congressional direction and the results of the Bypass Study. To determine which of the two action alternatives to select, the National Park Service considered how each alternative addressed interpretation and related visitor experience issues. Visitor experience related to the interpretation of the two battles is a key differentiating factor between the selected alternative and alternative C. Other aspects of the visitor experience, including but not limited to visitor safety, are essentially the same in the selected alternative and alternative C.

While First Manassas has drawn more attention and interest, Second Manassas is equally important. Although lands were added to the park specifically to address Second Manassas, this battle has received less emphasis at Manassas National Battlefield Park. The park's *Interpretive Prospectus* (1994) points out that "the fact that Manassas Battlefield contains the sites of two separate battles covering some of the same ground makes clear interpretation of both battles very difficult. Traditionally, the park's interpretive program has emphasized First Manassas at the expense of the Second Battle of Manassas." The same report found that less than 8 percent of all park visitors even started the Second Manassas Driving Tour, and less than 1% finished it. To solve this "identity crisis" for Second Manassas, the *Prospectus* calls for "an easily identifiable and accessible 'focal point' to begin the interpretation of Second Manassas."

The selected alternative addresses the issues raised in the interpretive prospectus by including a comprehensive approach to interpreting both battles. This approach will enable visitors to grasp the evolution of the conflict from the first battle—which many supporters and participants on both sides thought would be a quick and easy victory—to the second battle—which those same people now recognized was part of a long and very deadly affair. The new visitor center included in the selected alternative will place the two battles into context and tell the broader stories, while the contact stations at Henry Hill and Brawner Farm House will allow for a more in-depth exploration of First Manassas and Second Manassas respectively. The selected alternative will also help visitors understand how Civil War battles were fought literally in the front yards of residents, a common occurrence in mid-1800s warfare. Park patrons will be able to place these battles in the context of the entire war, including the important battles that occurred elsewhere between First and Second Manassas, as well as subsequent battles such as Antietam. Implementation of the selected alternative will give visitors a better understanding of the battles of Manassas because the two battles can be fully interpreted as distinct events with separate tour routes and visitor areas. In addition to an immersion in the strategies, tactics, troop movements, and wise and unwise military decisions by the commanders, visitors will leave the park with a much better understanding of the fundamental role that the Civil War played in American history. Therefore, the selected alternative will facilitate and deepen visitor understanding of the Civil War and the importance of both battles that occurred at Manassas.

In contrast, as described earlier, alternative C would focus on the "watershed" events of the two battles. Under this alternative, it would be more difficult to provide the same comprehensive understanding of the two battles, because the visitor experience would not be highly structured and key interpretive areas could be visited without order or sequence. This alternative would not address the issues raised in the *Interpretive Prospectus* related to the difficulties of interpreting each battle.

IMPACTS ON PARK RESOURCES AND VALUES AND FINDINGS ON IMPAIRMENT

The National Park Service Organic Act of 1916 and related laws mandate that the units of the national park system must be managed in a way that leaves them "unimpaired for the enjoyment of future generations." These laws give the National Park Service the management discretion to allow certain impacts to park resources and values, when necessary and appropriate to fulfill the purposes of a park, so long as the impact does not constitute impairment of the affected resources and values. NPS Director's Order 12: *Conservation Planning, Environmental Impact Analysis, and Decision Making* states that environmental documents will evaluate and describe impacts that may constitute an impairment of park resources or values.

As noted in *NPS Management Policies 2006*, an impact will be more likely to constitute impairment to the extent that it affects a resource or value whose conservation is

1. necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park,
2. key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park, or
3. identified as a specific goal in the park's general management plan or other relevant NPS planning documents.

Impairment may result from adverse impacts connected with National Park Service activities associated with managing the park, visitor activities, or activities undertaken by contractors and others operating in the park. In the final *General Management Plan/Environmental Impact Statement*, an impairment determination was included in the conclusion statement for all impact topics related to park resources and values (i.e., air quality; soundscapes; vegetation and wildlife; threatened, endangered, and rare species and natural communities; water resources; cultural resources). While the impacts to visitor use and enjoyment including recreation, transportation/traffic, socioeconomics, and park operations and management were analyzed in the *Environmental Impact Statement*, no impairment determinations were made because under National Park Service guidelines, these impact areas are not generally considered to be park resources or values.

Overall, the implementation of the selected alternative will not inhibit the park from fulfilling its specific purposes, as identified in the secretary of the interior's order establishing Manassas National Battlefield Park; it will not have any major adverse impacts to the integrity of the park's natural or cultural resources or prohibit opportunities for its enjoyment; and it will not cause the park to fail to achieve the goals identified in the general management plan or other relevant National Park Service planning documents. As a result, the National Park Service has determined that implementation of the selected alternative will not constitute an impairment to the

natural, cultural, or air quality resources or values of Manassas National Battlefield Park. This conclusion is based on a thorough analysis of the environmental impacts described in the final *Environmental Impact Statement*, relevant studies, the review of public comments and consultation with other agencies, and the professional judgment of the decision maker guided by the direction in NPS *Management Policies 2006*. Following is a summary of both beneficial and adverse impacts that will occur as a result of implementing the actions outlined in the selected alternative, including those impact topics where no impairment determinations were made (i.e., visitor use and enjoyment, recreation, transportation/traffic, socioeconomics, and park operations and management).

Construction and landscape rehabilitation activities that will occur will result in localized adverse impacts on air quality as a result of fugitive dust, particulates, and emissions produced by the necessary equipment. These impacts will be negligible to minor and adverse, and will last only as long as the action persists. The redistribution of traffic will result in negligible, beneficial impacts to air quality within the park and minor, long-term, adverse impacts on air quality outside the park. Adverse cumulative impacts on air quality are expected to be long term and minor.

There will be moderate, long-term, beneficial impacts on the park's soundscape as a result of the traffic and transportation changes. There will, however be minor, short-term, adverse impacts on the soundscape, resulting from forest removal activities, and there will be negligible, localized, long-term, adverse impacts on the soundscape, resulting from the construction of the new visitor center, contact station, and other small projects. Short-term, minor, adverse cumulative impacts on the soundscape will occur.

Vegetation and wildlife will experience both beneficial and adverse impacts relating to habitat modifications and changes in traffic patterns in the park. The impacts on vegetation and wildlife at Stuart's Hill will be long-term, adverse, and minor, because of the potential removal of vegetation to construct the road and improve parking. There will be beneficial impacts to vegetation from rehabilitation of the existing roadbed. The reduction of traffic and travel speeds will reduce the number of animals killed by vehicles, which will result in minor, long-term, beneficial impacts. The long-term, adverse impacts associated with the new access road, bridge, and visitor center on U.S. Route 29 will be moderate. Long-term, adverse impacts to wildlife from both the diversion of traffic and the changes in traffic levels on other roads outside the park will likely range from negligible to minor. The reduction of woodlands will have a minor, long-term, adverse impact on forest species and a minor, long-term, beneficial impact on species that prefer grasslands and edge habitats. The cumulative impacts to vegetation and wildlife will be minor to moderate, long-term, and adverse.

The National Park Service has concluded that the selected alternative will have no effect on federal-listed or state-listed threatened, endangered, or rare species and is not likely to adversely affect their habitats because no supporting habitats would be disturbed. The U.S. Fish and Wildlife Service concurred with these findings in a letter dated September 28, 2006. The cumulative impacts will affect, but not likely adversely affect, threatened and endangered species.

Water resources will experience both beneficial and adverse impacts. Construction of the new Stuart's Hill access road and visitor center will have short-term, negligible, adverse impacts. Transportation related improvements will have long-term, beneficial impacts by reducing the volume of polluted runoff that will reach water resources in the park. The removal of the U.S. Route 29 bridge will likely have minor, long-term, beneficial impacts on the floodplain and stream, and negligible, short-term, adverse impacts during demolition. The new visitor center and the new bridge over Bull Run with its associated approach roads will have moderate, long-term, adverse impacts on the floodplain, stream, and potentially on wetlands. There will be long-term, moderate, adverse cumulative impacts to water resources associated with this alternative.

Archeological surveys will precede any construction, and known archeological resources will be avoided during construction to the greatest extent possible. If national register - listed or national register - eligible archeological resources cannot be avoided during construction, the impacts to such resources will be adverse. A memorandum of agreement, in accordance with 36 Code of Federal Regulations Part 800.6, Resolution of Adverse Effects, will be negotiated between the staff of Manassas National Battlefield Park and the Virginia state historic preservation office as necessary. The memorandum of agreement will stipulate how the adverse effects will be mitigated. Any construction-related impacts to such archeological resources would be adverse. However, because archeological resources will be avoided to the greatest extent possible, no adverse impacts are anticipated. Although the cumulative impact will be adverse, any adverse impacts to archeological resources resulting from implementation of the selected action will be a small component of that cumulative impact.

Careful siting and design will ensure that the new facilities that will be carried forward as part of this plan (i.e., the new visitor center; the visitor contact station at the Brawner Farm; and the new access road and bridge over Bull Run) will be as compatible as possible with the historic landscape, no adverse effects will be anticipated. There will be no adverse effects associated with either the preservation and rehabilitation of historic structures and cultural landscapes or the construction of small parking areas, loop trails, and interpretive displays. Clearing trees from areas that were not forested during either battle and returning the landscape to more of a semblance of its historic appearance will contribute to a better understanding of both battles by the visitor. Restricting access to

U.S. Route 29 and VA Route 234 by commuter traffic and commercial trucks will have a beneficial impact on historic structures and cultural landscapes. Close coordination and communication with the state historic preservation office will occur during the implementation of all actions detailed under the selected alternative. Because the actions associated with the selected action are not expected to adversely affect any historic structures or cultural landscapes, there will be only minimal, adverse cumulative impacts.

Museum collections will be stored and protected according to NPS standards, both on-site and off-site. Moving artifacts and archives from the park to a facility outside the park will be less convenient for park staff members who require use of the collections for research, which will be a minor, adverse, long-term impact. However, there will be minor to moderate, beneficial impacts associated with providing more space for adequate curation, storage, and research. The cumulative impact to museum collections will be beneficial, long-term, and of minor to moderate intensity.

The controlled access measures under the selected alternative will have a major, long-term, beneficial impact on transportation within the park because of the reduction in commuter and truck traffic in the park. The controlled access measures and transportation improvements will also result in a long-term, moderate, beneficial impact on motorist and pedestrian safety. The impacts on transportation operations and congestion from the closure of the roads are being considered under the Manassas National Battlefield Bypass Study. The National Park Service will conduct additional planning and environmental analysis prior to choosing a preferred method for controlling access into the park and closing the roads to the public. Additional public outreach will be part of the planning process. Cumulatively, the transportation improvements will have major, long-term, beneficial impacts on the regional transportation system when added to other regional transportation projects in the immediate vicinity of the park.

Relative to socioeconomic, implementation of the selected alternative will have negligible, long-term, adverse impacts on residents living within the new controlled access because of the delays associated with controlled access measures. The impacts could be offset by the benefits of the reduction in traffic and associated delays at the intersections within the park. Negligible impacts to emergency response will occur. A few businesses could experience minor, adverse, long-term impacts. Minor, adverse, cumulative impacts will occur.

The selected action will have minor, long-term, beneficial impacts from the addition of or improvements to new hiking and bridle trails. Minor, beneficial cumulative impacts on recreation will occur.

The elimination of commuter and truck traffic, removal of the existing U.S. Route 29 bridge, battlefield scene rehabilitation, the addition of a visitor center, and preservation and maintenance of historic

structures will have a major, long-term, beneficial impact on the visitor experience. Beneficial cumulative impacts will be moderate and long-term.

The selected action will have minor and moderate, long-term, adverse impacts on park operations and maintenance because of changed operations associated with a new visitor center, visitor contact station for Second Manassas, new interpretive programs, change in ownership of the roads, and controlled access into the park. Negligible cumulative impacts will occur.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

In accordance with NPS Director's Order 12, the National Park Service is required to identify the environmentally preferable alternative in all environmental documents. The Council on Environmental Quality provides direction that the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in Section 101 of NEPA, which considers

1. fulfilling the responsibilities of each generation as trustee of the environment for succeeding generations
2. assuring for all generations safe, healthful, productive, and aesthetically and culturally pleasing surroundings
3. attaining the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences
4. preserving important historic, cultural, and natural aspects of our national heritage and maintaining, wherever possible, an environment that supports diversity and variety of individual choice
5. achieving a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities
6. enhancing the quality of renewable resources and approaching the maximum attainable recycling of nonrenewable resources

Alternative A (no-action) would not resolve traffic problems in the park. Commuter and commercial traffic would remain detrimental to the visitor experience, cultural resources, and visitor safety at the park. Implementation of alternative A would not fully achieve criteria 1 through 5 above. Alternative A does not completely fulfill the responsibilities to protect resources, nor does it assure a safe and culturally pleasing surrounding for succeeding generations (criteria 1 and 2). Furthermore, alternative A does not attain the widest range of beneficial use without degradation and risk of health and safety (criterion 3). For example, traffic levels adversely impact the battlefield resource, safety, and visitor use and experience. Alternative A fails to preserve and protect some of the cultural aspects and natural heritage of the park because of the traffic conditions (criterion 4). Finally, alternative A does not fully

achieve a balance between the resource and the surrounding population because commuter traffic through the park would continue to affect the battlefield cultural landscape and visitor experience (criterion 5). Based on this analysis, alternative A only minimally meets the criteria for the environmentally preferable alternative.

Both the selected alternative and alternative C promote national environmental policy as expressed in Section 101 of NEPA. These two action alternatives focus primarily on rehabilitation and preservation of the battlefield resources and the enhancement of the visitor experience, which are instrumental to the park's mission and purpose. Many of the actions under the selected alternative and alternative C would have beneficial impacts on the cultural environment and visitor experience while compromising some features of the natural or social environment.

Looking more specifically at the criteria established by the NEPA, the two action alternatives fulfill the National Park Service's responsibility as a trustee for the environment for succeeding generations (criterion 1) through resource protection and preservation. The actions included in the selected alternative and alternative C would assure that all generations have safe, healthful, and aesthetically and culturally pleasing surroundings (criterion 2) because of the visitor services enhancements, transportation improvements, battlefield scene rehabilitation, and historic structure preservation and rehabilitation. Both the selected action and alternative C would attain the widest range of beneficial uses of the environment (criterion 3) by decreasing adverse impacts to the battlefield resource, safety, and visitor use and experience by reducing the traffic flow within the park. Under the selected alternative and alternative C, the National Park Service seeks to preserve the cultural and natural heritage aspects (criterion 4) of the park consistent with the park's purpose and the mission of the National Park Service. Both alternatives also seek to restore a balance between the population and the resource (criterion 5) by eliminating commuter and commercial traffic on the portions of U.S. Route 29 and VA Route 234 that run through the park in order to enhance cultural resources, the soundscape, and the visitor experience.

Both alternatives include the development of a new visitor center. The new structure would be designed to conform with NPS policies related to energy conservation and sustainable building practices (criterion 6). Because both alternatives include the new visitor center, this facility does not factor into the analysis relative to the consistency of each alternative with this criterion. The selected alternative includes the continued use of the Henry Hill visitor center so this would maximize the use of existing resources at the park but would also likely use more energy than alternative C. Under alternative C, the Henry Hill visitor center would be removed. While removing the Henry Hill visitor center provides an opportunity to rehabilitate the landscape and provided some benefits with respect to energy

conservation, it does not maximize the use of existing resources with the park. Given the level of detail in this analysis, it is not possible to analyze the trade-offs related to energy use versus the continued use of existing facilities. For purposes of this analysis the selected alternative and alternative C are effectively the same relative to this NEPA criterion.

To identify the environmentally preferable alternative, the impacts to the natural, socioeconomic, and cultural environments from each alternative were assessed based on the criteria from Section 101 of NEPA. Based on this assessment, alternative A only minimally meets the criteria and is therefore not the environmentally preferable alternative. Based on the criteria, the selected alternative and alternative C are very similar with respect to criteria 1, 2, 3, 4, 5, and 6. For this reason, the environmentally preferable alternative is both the selected alternative and alternative C.

In determining a preferred alternative, the National Park Service considers more than just the criteria for the environmentally preferable alternative. In this case, the National Park Service considered the purpose of the park as identified in the establishing legislation. The park's mission is "to preserve and protect the sites, structures, and objects associated with the Battles of First and Second Manassas and, through interpretation, foster an understanding and appreciation of their significance in the broader context of the American Civil War for the inspiration and benefit to the public." As noted previously, the selected action best fulfills the purpose of the park because it places equal emphasis on interpretation of both battles. Although the differences between the selected action and alternative C with respect to the NEPA evaluation criteria are small, the selected alternative best fulfills the purpose of the park and is therefore more consistent with Congressional intent. For this reason, the agency's preferred alternative is the selected action.

PUBLIC AND AGENCY INVOLVEMENT

Public Meetings

The *Manassas National Battlefield Park General Management Plan/ Environmental Impact Statement* was developed with the participation of governmental agencies, nongovernmental organizations, and members of the public at large. Formal public participation began in March 1996, when the park superintendent sent a letter and mail-in comment form to more than 800 people and groups on the park's initial mailing list. This letter described the effort to develop a new general management plan for the park and invited all addressees to participate in the project. The public scoping meetings were held on March 18 and 20, 1996. The comment form asked recipients to describe any issues and concerns they had about the park, as well as their ideas for the future of the battlefields.

The letter was also posted on the park's Internet site and electronic comments were encouraged. In addition, the meetings were announced in local newspapers, on local television, and in the *Federal Register*. The first public meetings provided attendees with the opportunity to learn about the planning effort, ask questions, and voice their ideas about the park. The mail-in comment form was also distributed at the public meetings. More than 100 people attended the meetings and more than 250 comment forms and electronic responses were received. Additional informal meetings were held during this first round of public participation. The project was discussed with groups associated with the park, including the Bull Run Civil War Roundtable and the Battlefield Equestrian Society. The project team also met with groups that expressed interest in specific aspects of the plan, such as the Prince William Bicycle Association, the Friends of Manassas National Battlefield Park, and the Prince William Wildflower Society.

From the meetings and comment forms, the project team learned that respondents cared deeply about the battlefields and were concerned with almost every aspect of the park, including traffic, trails, adjacent development, historic buildings, visitor facilities, interpretation, the natural environment, partnerships, the historic scene, and recreational uses.

The responses, along with the results of the park's data gathering study, provided a range of major issues facing the future of the park. The project team next reviewed past Congressional legislation that shaped the park and examined the important battlefield resources and stories. Collectively, this information helped the project team develop goals for the park's future and preliminary alternatives to achieve those goals.

Public Outreach

To help communicate ongoing planning issues, and encourage further public participation, a newsletter was distributed to those on the park mailing list, and to anyone expressing interest in the process. The first newsletter, sent in January 1997, restated the preliminary goals and alternatives to make sure they addressed the ideas discussed during the first round of public participation. On February 10 and 11, 1997, public meetings were held at the park visitor center. As with the first round of public meetings, the meetings were publicized in local papers, and the newsletter and meeting announcement were posted on the park's Internet page. An article was included in the *Civil War News* to encourage participation by the Civil War community. Meeting participants were invited to respond to the goals and help the planning team refine the preliminary alternatives or develop new alternatives. Ideas from these meetings and the responses were used to refine the alternatives and develop the draft plan.

As the draft general management plan was being prepared in 1997, the project team continued to meet with interested groups and study the impacts of the alternatives. The National Park Service contracted with

Virginia Natural Heritage to study those areas identified in the alternatives where woodlands would be removed and the historic field patterns would be rehabilitated to ensure threatened and endangered species would not be impacted. The National Park Service also contracted with Robert Peccia and Associates to supplement the traffic modeling provided by the Virginia Department of Transportation in the U.S. Route 29 study to understand the impacts of relocating through traffic from the park.

In 2000, the National Park Service put the general management plan process on hold to concentrate on separate, but related, transportation concerns. This included the Bypass, which would re-route U.S. Route 29 and VA Route 234 around the park, removing commuter traffic from these roads within park boundaries. The environmental impact study for the Bypass began in 2001, and a preferred alternative was selected in 2005.

Public meetings for the Manassas National Battlefield Park general management plan resumed in 2002 with a public focus group meeting, designed specifically to address issues surrounding transportation and circulation in the park. This meeting occurred on December 5, 2002, with 18 individuals in attendance. A new newsletter was sent to the mailing list in the fall of 2003. Sixty written and electronic comments were received.

Public Comment

The review period for the *Draft General Management Plan/Environmental Impact Statement* was between December 30, 2005 and February 28, 2006. Two public meetings were held on February 8 and 9, 2006 at the park visitor center at Henry Hill. Thirteen people attended one meeting and seven people attended the other meeting.

During the public comment period, 28 comments were received from 28 state and federal agencies, organizations, and individuals. In general, respondents supported the management efforts described in the *Draft General Management Plan/Environmental Impact Statement*. The six respondents who expressed a preference supported the implementation of the selected alternative. Specifically respondents expressed support for reducing traffic flow within the park and improving the visitor experience. One respondent also noted that the selected alternative would provide benefits for wildlife, particularly birds. Only one respondent expressed a preference for the no-action alternative.

Most of the comments received referred to actions in the park that are part of daily operations or would be relevant during implementation of the actions proposed in this plan. Because a general management plan is a programmatic document designed to provide guidance in relation to park management goals and how to achieve desired future conditions, issues related to the daily management of the park are not directly addressed in a general management plan. Most of these comments will be

considered during planning and implementation of the individual actions.

A few commenters suggested actions that are against National Park Service policy, are contrary to the goals of the park, or are covered under other plans. For example, it was suggested that the park have battle reenactments. Reenactments are prohibited by National Park Service policy and will not be considered (see *NPS Management Policies 2006*, Section 7.5.9).

Several responses received on the *Draft General Management Plan/Environmental Impact Statement* included comments relevant to the Manassas National Battlefield Park Bypass Study. These comments have not been addressed, as they are outside the scope of the *General Management Plan/Environmental Impact Statement*. Fairfax County also expressed concern regarding other transportation issues connected to the closure of U.S. Route 29 to commuter and commercial truck traffic. Because these issues involve transportation impacts outside the park, these issues are beyond the scope of the plan and are being addressed as part of the Manassas Battlefield Bypass environmental impact statement. Additional information related to the Bypass can be found by visiting the Manassas National Battlefield website at www.nps.gov/mana. On the left side of the home page click on "Management," then click on the link to the Bypass Study.

Comments that Resulted in a Change to the Final Document

The National Park Service received a number of substantive comments that suggested changes to address factual errors found in the *Draft General Management Plan/Environmental Impact Statement*. These included a comment from the County of Fairfax, Virginia that noted that the description of the current land use on the east side of the park was incorrect. The *Draft General Management Plan/Environmental Impact Statement* stated that construction of the proposed visitor center in alternative C would result in negligible to minor impacts on land use, based on the high level of development already present in this area. The comment from the county indicated that this area is one of the least-densely developed parts of the county. The description of the land use outside the east boundary was revised accordingly.

Implementation of the action alternatives proposed in the final *General Management Plan/Environmental Impact Statement* would be unlikely to have a greater than minor impact on surrounding land uses outside the park boundary. Although the development of a new visitor center could have localized impacts on adjacent properties, the visitor center is unlikely to change surrounding land uses or increase the density of residential development. The potential impacts on residential development patterns associated with the new visitor center are expected to be negligible to minor because of the rural character of the area and the current zoning pattern. Prior to development of the visitor center, additional site-specific planning and compliance would be completed as necessary.

The Commonwealth Transportation Board approved the development of a Bypass contingent on the mitigation of traffic impacts resulting from the Bypass. Within the park, the board was concerned about the impact on emergency access if the modern highway bridge on U.S. Route 29 were removed. Fairfax County also expressed concern about emergency access.

To address this concern, the selected alternative was modified. As in alternative C, the modern highway bridge on U.S. Route 29 will be removed. A new bridge and access road will be constructed south of the modern bridge in a location with fewer adverse impacts on the cultural landscape, visitor experience, and interpretation. These impacts were addressed in the *Draft General Management Plan/Environmental Impact Statement* as part of alternative C. A detailed discussion of the changes to the selected alternative was incorporated into the "Alternatives, including the Preferred Alternative" chapter of the final *Manassas National Battlefield Park General Management Plan/Environmental Impact Statement*.

Replacing the U.S. Route 29 Bridge would benefit the cultural resources in the park by removing the modern structure from a site that played a key role in the Battles of First and Second Manassas. Removing the bridge would also allow for more complete interpretation of the site and would enhance visitor experience and safety in the area.

The environmental impacts and costs of the new access road and bridge are addressed in the final plan in the "Environmental Consequences" section and in appendix D because these facilities would be within park boundaries. However, because these changes are related to mitigative measures associated with the Bypass Study, implementation of these actions would occur in conjunction with the development of the Bypass.

The Coalition for Smarter Growth suggested that consideration should have been given to an action alternative that did not include the construction of a bypass around the park. The National Park Service has determined that such an alternative would be contrary to a Congressional mandate and the management goals for Manassas National Battlefield Park. The National Park Service believes an adequate range of alternatives was considered in the *Draft General Management Plan/Environmental Impact Statement*. Additional text was developed to clarify the matter and is included under the heading "Alternative Considered but Eliminated from Further Analysis" in the "Alternatives, including the Preferred Action" chapter of the final plan.

Agency and American Indian Consultation and Coordination

There are no Indian trust resources in the area of Manassas National Battlefield Park. The lands that make up the park are not held in trust by the Secretary of the Interior for the benefit of Indians based on their status as Indians.

The National Park Service consulted with the Virginia Department of Historic Resources (the state historic preservation office) and the Advisory Council on Historic Preservation throughout the planning process. The Virginia state historic preservation officer has indicated office support for alternative B, the selected alternative, as modified in the final *General Management Plan/Environmental Impact Statement* to include the removal of the modern bridge on U.S. Route 29 with construction of a new bridge and access road further south with fewer adverse impacts on the cultural landscape, visitor experience, and interpretation. The National Park Service again consulted with the Virginia Department of Historic Resources on December 11, 2009 about the changes to the selected action incorporated into this record of decision. The Department of Historic Resources has indicated support for including a new visitor center into the selected action. A copy of their correspondence is appended to this document.

The National Park Service initiated consultation under Section 7 of the Endangered Species Act with the U.S. Fish and Wildlife Service when the project was initiated in 1996. The consultation process was completed when the U.S. Fish and Wildlife Service provided comments on the *Draft General Management Plan/Environmental Impact Statement*. The U.S. Fish and Wildlife Service concurred with the conclusions of the National Park Service that actions proposed in the plan "will not adversely affect federally listed species or federally designated critical habitat because no federally listed species are known to occur in the project area."

In their comments on the *Draft General Management Plan/Environmental Impact Statement*, the Environmental Protection Agency supported the no-action alternative with construction of the Manassas National Battlefield Park Bypass. The agency also provided a range of very detailed comments on the *Draft General Management Plan/Environmental Impact Statement* that are more applicable to implementation-level planning. The comments will be considered during future implementation efforts.

CONCLUSION

The National Park Service has selected Alternative B, The Two Battles of Manassas - A Comprehensive Understanding of Each Battle, to guide future management of Manassas National Battlefield Park. The selected alternative has been modified in this Record of Decision to include a new visitor center. Because the visitor center was analyzed under another alternative, no additional analysis is required. Of the alternatives considered, the selected alternative is the most consistent with both the purpose of the park and direction from Congress. As described in the "Mitigative Measures/Best Management Practices" section, all practical means to avoid or minimize environmental harm from the selected alternative have been adopted. Implementation of the selected alternative will not impair park resources or values and will not violate the National Park Service Organic Act.



COMMONWEALTH of VIRGINIA

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Edmund W. Clark, Superintendent
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National Park Service
Manassas National Battlefield Park
12521 Lee Highway
Manassas, Virginia 20109

Re: Final General Management Plan/Environmental Impact Statement
Manassas National Battlefield Park
Prince William County, Virginia
DHR File No. 2004-1264

Dear Mr. Clark:

Thank you for taking the time to meet with us on December 11, 2009 to present the proposed revision to the General Management Plan prepared in April 2008. We understand that the National Park Service is preparing a Record of Decision for the Final General Management Plan/Environmental Impact Statement for Manassas National Battlefield Park. Alternative B is now the park's preferred alternative, which has been modified from the Alternative B presented in 2008 GMP. Under this alternative the Park will focus on interpreting the two battles of Manassas as distinct military events. DHR strongly supports this revised alternative which includes development of a New Visitor's Center near Stone Bridge on the eastern boundary of the park. The new visitor center will be designed as the initial stop and primary orientation point for the park. Based on our discussions at our meeting and the information provided in your letter of December 11, 2009, we fully agree that this alternative will most effectively allow the park to meet its management and interpretation goals.

We look forward to working with you as you implement the plan. If we may provide any further assistance, please do not hesitate to contact me at (804) 367-2323, ext. 112; fax (804) 367-2391; e-mail ethel.eaton@dhr.virginia.gov.

Sincerely,

A handwritten signature in cursive script that reads "Ethel R. Eaton".

Ethel R. Eaton, Ph.D., Senior Policy Analyst
Division of Resource Services and Review